

EXHIBIT 11
(Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

1 A I believe this is when I was hoping to
2 join the CVRA case.

3 Q All right. And do you know when this
4 document was filed?

5 And actually, just to be clear, about
6 halfway there's actually a second document that was
7 filed. So this is a composite exhibit. Let me be
8 very clear.

9 So after page 14 -- I'm sorry, 13, there's
10 a second document that is styled Jane Doe #3 and Jane
11 Doe #4's Corrected Motion Pursuant to Rule 21 for
12 Joinder In Action.

13 Do you see that?

14 A Did you say page 14?

15 Q It is on the 14th page of this document.

16 Do you see that?

17 A I do.

18 Q And so this composite Exhibit 2 has both a
19 motion and a corrected motion.

20 Do you see that?

21 A Yes.

22 Q And were both of those pleadings
23 authorized by you to be filed?

24 A Yes.

25 Q In other words, you wanted to join the

1 CVRA action in or about December 30th, 2014, correct?

2 A I -- I'm not aware of the exact dates.

3 There's no dates on this. But I did try to join the
4 motion, yes.

5 Q All right. If you can look at the top
6 line of the document.

7 A Yes.

8 Q Does it say, Entered on FLSD --

9 A Oh, it does, too, I'm sorry, yes.

10 Q That's all right. So does that refresh
11 your memory as to about when you first sought to join
12 the CVRA action?

13 A Yes.

14 Q December 30th, 2014, correct?

15 A Yes.

16 Q And the corrected motion was filed a few
17 days later, correct?

18 A Yes, correct.

19 Q If I could turn to Defendant's Exhibit 3,
20 which was January 21st.

21 (Exhibit 3 marked.)

22 MR. EDWARDS: Thank you.

23 Q (BY MS. MENNINGER) Do you recognize this
24 document?

25 A Yes, I do.

1 physical features of Ghislaine Maxwell?

2 A I can tell you that she had very large
3 natural breasts. I can tell you that her pubic hair
4 was dark brown, nearly black. I don't remember any
5 specific birthmarks or moles that I could point out
6 that would be relevant.

7 Q Any scar?

8 A I don't remember any scars.

9 Q Any tattoos?

10 A No tattoos.

11 Q When did you next go to the El Brillo
12 house?

13 A I believe it would have been the next day.

14 Q You believe it would have been or was it?

15 MR. EDWARDS: Form.

16 A I know that it was consecutive, that I
17 continued to go there after my first -- the first
18 time that the abuse took place there. It was
19 consecutive that I was there, I believe, over the
20 next course of weeks.

21 Q (BY MS. MENNINGER) What day of the week
22 was the first time you went?

23 A I don't know.

24 Q Do you know whether you went the very next
25 day or not?

1 A I believe I did.

2 Q All right. How did you get there the very
3 next day?

4 MR. EDWARDS: Form.

5 A I believe my dad dropped me off again.

6 Q (BY MS. MENNINGER) When you say you
7 believe, do you recall him doing that or are you
8 guessing?

9 A I don't -- well, this is how I figure
10 this. I don't remember Ghislaine picking me up from
11 Mar-a-Lago. I didn't have my own car. So the only
12 way I could have really gotten there would have been
13 my dad picking me up -- I mean, sorry, dropping me
14 off.

15 Q Do you have a distinct recollection of
16 your father dropping you off there more than one day
17 in a row?

18 A Yes.

19 Q You do not recall the car he was driving?

20 A Like I said, he always drove trucks.
21 That's as good as I can get.

22 Q And so -- and you worked on weekends as
23 well at Mar-a-Lago or no?

24 A No.

25 Q So the second day would have had to be

1 A I wouldn't say directly.

2 Q How --

3 A I'd say I stayed with my parents for --
4 like, I think I finished school at Crestwood. So I
5 would have been in, I don't know, I guess eighth
6 grade, finished eighth grade. And then -- I don't
7 know. I really don't know. Around eighth grade.

8 Q You went to Growing Together?

9 A I think -- I think it was then.

10 Q And how many years did you live at Growing
11 Together?

12 A Over a year.

13 Q Were you ever in foster care?

14 A What Growing Together was, was like a
15 group home that sent you away to foster parents every
16 night.

17 Q So you lived in other people's homes
18 during the period of time you were assigned to
19 Growing Together?

20 A Well, you stayed at Growing Together
21 during the day and then at night you get sent home
22 with parents.

23 Q Did you go to school while you were at
24 Growing Together?

25 A Yeah, they offer education there.

1 Q So the education was at Growing Together?

2 A Yeah.

3 Q You did not attend a Palm Beach County --

4 A I did, but you had to earn your levels up
5 to be able to go outside. So I don't remember what
6 level you have to get up to, to go out to another
7 school. I think there was like seven levels or
8 something. And you had to make it to, like, level 4
9 to be able to go to outside school.

10 Q So for some period of time you were
11 assigned to Growing Together and you were going to
12 school at Growing Together. And for some period of
13 time you were going to other schools and coming back
14 to Growing Together?

15 A Correct.

16 Q And then when you came back to Growing
17 Together, you were sent to spend the night at a
18 family's home?

19 A Yes.

20 Q So you never slept at Growing Together?

21 A No.

22 Q Did you live -- other than living at or
23 staying at Growing Together during the day and
24 sleeping at these other homes at night, is there
25 anywhere else that you recall living in the period

1 a 3. I think it's [REDACTED]
2 [REDACTED]. I really can't make out
3 the telephone number.

4 Q Okay. Do you see Relationship? Can you
5 read that?

6 A Friend.

7 Q Okay. Do you see just below that there's
8 a line that says number 21?

9 A Do not stop -- sorry, Do not sign
10 application until requested to do so by
11 administering an oath.

12 Q Okay.

13 A Applicant's signature age 13 or older.

14 Q Oh, it's by the signature line?

15 A Yeah.

16 Q And that's your signature?

17 A Yes.

18 Q All right. And this is the document that
19 you recall filling out for your first passport?

20 A I don't recall doing it, but yes, it's in
21 my handwriting and it's got all of my information on
22 it.

23 Q Okay. And on line -- box 23 it's got your
24 driver's license checked off, right?

25 A July 23. Yeah, I really can't make out

1 And when they say massage, that means erotic, okay?
2 That's their term for it. I think there are plenty
3 of other witnesses that can attest to what massage
4 actually means.

5 And I'm telling you that Ghislaine told me
6 to go to [REDACTED] and give him a massage, which
7 means sex.

8 Q Okay. So [REDACTED] -- Ghislaine Maxwell told
9 you to go give a massage to [REDACTED]?

10 A Correct.

11 Q That's your testimony?

12 A That is my testimony.

13 Q All right. Ghislaine Maxwell told you to
14 go give a massage to [REDACTED], correct?

15 A Correct.

16 Q Ghislaine Maxwell told you to give a
17 massage to [REDACTED], correct?

18 A Correct.

19 Q Ghislaine Maxwell told you to give a
20 massage to [REDACTED], correct?

21 A Correct.

22 Q When did Ghislaine Maxwell tell you to
23 give a massage to [REDACTED]?

24 A I don't know dates.

25 Q Where were you?

1 A When it happened?

2 Q When Ghislaine Maxwell used the words, Go
3 give a massage to Bill Richardson, where were you?

4 MR. EDWARDS: Object to the form.
5 Mischaracterizes her testimony.

6 A I can't tell you where we were. I know
7 where I was sent to. I don't know where we were when
8 she told me to do that.

9 Q (BY MS. MENNINGER) Where were you sent
10 to --

11 A New Mexico.

12 Q -- by Ghislaine Maxwell?

13 MR. EDWARDS: Object to the form.
14 Mischaracterizes her testimony again.

15 A Are you smiling at me because --

16 Q (BY MS. MENNINGER) No, I'm asking you to
17 answer the question.

18 A I have answered the question. I was sent
19 to New Mexico.

20 Q Okay. Where were you sent from?

21 A I already answered that. I don't know
22 where I was sent from.

23 Q Okay.

24 A I was flying everywhere with these people.

25 Q Where were you sent by Ghislaine Maxwell

1 to have sex with [REDACTED]?

2 MR. EDWARDS: Object to the form.

3 Mischaracterized her testimony.

4 A Many places.

5 Q (BY MS. MENNINGER) Ghislaine Maxwell sent
6 you to many places to have sex with [REDACTED]?

7 MR. EDWARDS: Object to the form.

8 A It happened at many places, yes.

9 Q (BY MS. MENNINGER) You had sex with [REDACTED]
10 [REDACTED] at many places is what you're saying,
11 correct?

12 A I was sent to [REDACTED] at many
13 places to have sex with him.

14 Q When did Ghislaine Maxwell send you to a
15 place to have sex with [REDACTED]?

16 A You are asking --

17 MR. EDWARDS: Form.

18 A -- me to answer the impossible.

19 Q (BY MS. MENNINGER) All right. When did
20 Ghislaine Maxwell send you to have sex with the owner
21 of a large hotel chain?

22 MR. EDWARDS: Object to the form.

23 Mischaracterization.

24 A I'm going to keep answering the questions
25 the same way that I keep answering them. I don't

1 know where it was when she said to go do this.

2 Q (BY MS. MENNINGER) Okay. Where were you
3 sent to have sex with the owner of a large hotel
4 chain by Ghislaine Maxwell?

5 MR. EDWARDS: Object to the form.

6 A I believe that was one time in France.

7 Q (BY MS. MENNINGER) Which time in France?

8 A I believe it was around the same time that
9 Naomi Campbell had a birthday party.

10 Q Where did you have sex with the owner of a
11 large hotel chain in France around the time of Naomi
12 Campbell's birthday party?

13 A In his own cabana townhouse thing. It was
14 part of a hotel, but I wouldn't call it a hotel.

15 Jeffrey was staying there. Ghislaine was
16 staying there. Emmy was staying there. I was
17 staying there. This other guy was staying there. I
18 don't know his name.

19 I was instructed by Ghislaine to go and
20 give him an erotic massage.

21 Q She used the words erotic massage?

22 A No, that's my word. The word massage is
23 what they would use. That's their code word.

24 Q Was she in the room when you gave this
25 erotic massage to the owner of a large hotel chain?

1 A No, she was not in the room. She was in
2 another cabana.

3 Q And other than telling you to go give the
4 owner of this large hotel chain a massage, do you
5 remember any other words she used to you to direct
6 you in what you should do?

7 A Not at the time, no.

8 Q Where did -- where were you and where was
9 Ms. Maxwell when she directed you to go have sex with
10 Marvin Minsky?

11 MR. EDWARDS: Object to the form.

12 A I don't know.

13 Q (BY MS. MENNINGER) Where did you go to
14 have sex with Marvin Minsky?

15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.

18 Q And when was that?

19 A I don't know.

20 Q Do you have any time of year?

21 A No.

22 Q Do you know how old you were?

23 A No.

24 Q Other than Glenn Dubin, Stephen Kaufmann,
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

1 another prince, the large hotel chain owner and
2 Marvin Minsky, is there anyone else that Ghislaine
3 Maxwell directed you to go have sex with?

4 A I am definitely sure there is. But can I
5 remember everybody's name? No.

6 Q Okay. Can you remember anything else
7 about them?

8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.

13 Q Do you have any notes of all these people
14 that you were sent to?

15 A No, I don't.

16 Q Where are your notes?

17 A I burned them.

18 Q When did you burn them?

19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.

21 Q Did you have lawyers who were representing
22 you at the time you built a bonfire and burned these
23 notes?

24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.

4 Q So you burned notes of the men with whom
5 you had sex while you were represented by counsel in
6 litigation, correct?

7 MR. EDWARDS: Object to the form.

8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.

11 Q (BY MS. MENNINGER) When did you write
12 that journal?

13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.

16 Q So you did not write this journal at the
17 time it happened?

18 A No.

19 Q You started writing this journal
20 approximately a decade after you claim you finished
21 being sexually trafficked, correct?

22 A Yes.

23 Q And you started writing a journal after
24 you had a lawyer, correct?

25 A Correct.

1 Q Including Mr. Edwards, who is sitting
2 right here, correct?

3 A Correct.

4 Q What did that journal look like?

5 A It was green.

6 Q And what else?

7 A It was just a spiral notebook.

8 Q Okay. And what did you put into that
9 green spiral notebook?

10 A Bad memories. Things that I've gone
11 through, lots of things, you know. I can't tell you.
12 There was a lot of pages. It was over 300 pages in
13 that book.

14 Q Did you ever show that book to your
15 lawyers?

16 A No.

17 Q Did you show that book to anyone?

18 A My husband.

19 Q Did you show it to anyone else besides
20 your husband?

21 A No.

22 Q Did you tear out pages and give them to
23 Sharon Churcher?

24 A No, I wrote -- those pages that you're
25 talking about, I wrote for her specifically. She

1 wanted to know about the Prince Andrew incident.

2 Q So that's a different piece of paper?

3 A Yeah, that's just random paper.

4 Q So you had a green spiral notebook that
5 you began sometime in 2011 or 2012 in which you wrote
6 down your recollections about what had happened to
7 you, and you burned that in a bonfire in 2013.

8 Did I get that right?

9 A You got that right.

10 Q And do you have no other names of people
11 to whom you claim Ghislaine Maxwell directed you to
12 have sex, correct?

13 A At this time, no.

14 Q Is there any document that would refresh
15 your recollection that you could look at?

16 A If you have a document you'd like to show
17 me, I would be glad to look at it and tell you the
18 names I recognize off of that.

19 Q I'm just asking you if there's a document
20 you know of that has this list of names in it?

21 A Not in front of me, no.

22 Q Where is the original of the photograph
23 that has been widely circulated in the press of you
24 with Prince Andrew?

25 A I probably still have it. It's not in my

1 possession right now.

2 Q Where is it?

3 A Probably in some storage boxes.

4 Q Where?

5 A In Sydney.

6 Q Where in Sydney?

7 A At some family's house. We got the boxes
8 shipped to Australia, and they were picked up off the
9 porch by my nephews and brought to their house.

10 Q Which is where?

11 A In Sydney.

12 Q Where in Sydney?

13 A [REDACTED].

14 Q And who lives in that house?

15 A Well, it's owned by my mother-in-law and
16 father-in-law, but my nephews live in the house.

17 Q What are their names?

18 A I'm not giving you the names of my
19 nephews.

20 Q What's the address of the house?

21 A Why would you want that?

22 Q I want to know where the photograph is.

23 I'm asking you where the photograph is. And you've
24 just told me it's somewhere in [REDACTED]

25 A Yes.

1 Q So where in [REDACTED] is the photograph
2 located?

3 A If I can't 100 percent say that the
4 photograph is there, it could be at my house that I
5 presently live in. I'm not going to give you the
6 address of my nephews' residence.

7 Q When is the last time you saw the
8 photograph in person?

9 A When I packed and left America.

10 Q Colorado?

11 A Yes.

12 Q All right. So you had that photograph
13 here with you in Colorado?

14 A Yes.

15 Q What's on the back of the photograph?

16 A I'm sorry?

17 Q Is there anything on the back of the
18 photograph?

19 A There's like the date it was printed, but
20 no writing or anything.

21 Q Okay. Does it say where it was printed?

22 A I don't believe so. I think it just -- I
23 don't remember. I just remember there's a date on
24 it.

25 Q Whose camera was it taken with?

1 A My little yellow Kodak camera.

2 Q Who took the picture?

3 A Jeffrey Epstein.

4 Q And where did you have it developed?

5 A I believe when I got back to America.

6 Q So where?

7 A I don't know.

8 Q Palm Beach?

9 A I don't know.

10 Q What is the date the photograph was
11 printed?

12 A I believe it's in March 2001.

13 Q Okay.

14 A But that's just off of my photographic
15 memory. I don't -- it could be different, but I
16 think it's March 2001.

17 Q You have a photographic memory?

18 A I'm not saying I have a photographic
19 memory. But if I'd look at the back of the photo and
20 I remember what it says, I believe it was March 2001.

21 Q Did the photograph ever leave your
22 possession for a while?

23 A I gave it to the FBI.

24 Q Okay. And when did you get it back?

25 A When they took copies of it.

1 Q When was that?

2 A 2011.

3 Q When they came to interview you?

4 A Yes.

5 Q So from 2011 until you left Colorado it
6 was in your personal possession?

7 A Yes.

8 Q What other documents related to this case
9 are in that, storage boxes in Australia?

10 MR. EDWARDS: Object to the form.

11 A Documents related to this case -- there --
12 I don't know. I really can't tell you. I mean,
13 there's seven boxes full of Nerf guns, my kids' toys,
14 photos. I don't know what other documents would be
15 in there.

16 Q (BY MS. MENNINGER) Did anyone search
17 those documents after you received discovery requests
18 from us in this case?

19 A I haven't been able to obtain those boxes.
20 I can't get them sent back up to me. It's going to
21 cost me a large amount of money. And right now I'm
22 trying to look after my family, so I'm not able to
23 afford to get them up.

24 Q You live in Australia, correct?

25 A I do.

1 read it.

2 MS. MENNINGER: We're going off the
3 record.

4 MR. EDWARDS: Yeah, that's fine. She'll
5 read.

6 THE VIDEOGRAPHER: That concludes today's
7 proceedings. We're off the record at 5:28.

8 (Proceedings concluded at 5:28 p.m.)

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10 * * * * *

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EXHIBIT D

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE

May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN, P.L.

By Brad Edwards, Esq.
425 N. Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301
Phone: 954.524.2820
brad@pathtojustice.com
Appearing on behalf of the
Plaintiff

BOIES, SCHILLER & FLEXNER LLP

By Sigrid S. McCawley, Esq. (For Portion)
401 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301-2211
Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the
Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.

3 By Laura A. Menninger, Esq.

4 Jeffrey S. Pagliuca, Esq.

5 150 East 10th Avenue

6 Denver, CO 80203

7 Phone: 303.831.7364

8 lmenninger@hmflaw.com

9 jpagliuca@hmflaw.com

10 Appearing on behalf of the

11 Defendant

12 Also Present:

13 Brenda Rodriguez, Paralegal

14 Nicholas F. Borgia, CLVS Videographer

Pursuant to Notice and the Federal Rules of Civil Procedure, the VIDEOTAPED DEPOSITION OF VIRGINIA GIUFFRE, called by Defendant, was taken on Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150 East 10th Avenue, Denver, Colorado, before Kelly A. Mackereth, Certified Shorthand Reporter, Registered Professional Reporter, Certified Realtime Reporter and Notary Public within Colorado.

* * * * *
I N D E X

EXAMINATION	PAGE
MS. MENNINGER	8
PRODUCTION REQUEST(S) :	
(None.)	

1 wanted to know about the Prince Andrew incident.

2 Q So that's a different piece of paper?

3 A Yeah, that's just random paper.

4 Q So you had a green spiral notebook that
5 you began sometime in 2011 or 2012 in which you wrote
6 down your recollections about what had happened to
7 you, and you burned that in a bonfire in 2013.

8 Did I get that right?

9 A You got that right.

10 Q And do you have no other names of people
11 to whom you claim Ghislaine Maxwell directed you to
12 have sex, correct?

13 A At this time, no.

14 Q Is there any document that would refresh
15 your recollection that you could look at?

16 A If you have a document you'd like to show
17 me, I would be glad to look at it and tell you the
18 names I recognize off of that.

19 Q I'm just asking you if there's a document
20 you know of that has this list of names in it?

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23 that has been widely circulated in the press of you
24 with Prince Andrew?

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1 possession right now.

2 Q Where is it?

3 A Probably in some storage boxes.

4 Q Where?

5 A In Sydney.

6 Q Where in Sydney?

7 A At some family's house. We got the boxes
8 shipped to Australia, and they were picked up off the
9 porch by my nephews and brought to their house.

10 Q Which is where?

11 A In Sydney.

12 Q Where in Sydney?

13 A 

14 Q And who lives in that house?

15 A Well, it's owned by my mother-in-law and
16 father-in-law, but my nephews live in the house.


17 Q What are their names?

18 A I'm not giving you the names of my
19 nephews.

20 Q What's the address of the house?

21 A Why would you want that?

22 Q I want to know where the photograph is.

23 I'm asking you where the photograph is. And you've
24 just told me it's somewhere in 

25 A Yes.

1 Q So where in [REDACTED] is the photograph
2 located?

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4 photograph is there, it could be at my house that I
5 presently live in. I'm not going to give you the
6 address of my nephews' residence.

7 Q When is the last time you saw the
8 photograph in person?

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18 photograph?

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20 no writing or anything.

21 Q Okay. Does it say where it was printed?

22 A I don't believe so. I think it just -- I
23 don't remember. I just remember there's a date on
24 it.

25 Q Whose camera was it taken with?

1 A My little yellow Kodak camera.

2 Q Who took the picture?

3 A Jeffrey Epstein.

4 Q And where did you have it developed?

5 A I believe when I got back to America.

6 Q So where?

7 A I don't know.

8 Q Palm Beach?

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10 Q What is the date the photograph was
11 printed?

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15 memory. I don't -- it could be different, but I
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19 memory. But if I'd look at the back of the photo and
20 I remember what it says, I believe it was March 2001.

21 Q Did the photograph ever leave your
22 possession for a while?

23 A I gave it to the FBI.

24 Q Okay. And when did you get it back?

25 A When they took copies of it.

1 Q When was that?

2 A 2011.

3 Q When they came to interview you?

4 A Yes.

5 Q So from 2011 until you left Colorado it
6 was in your personal possession?

7 A Yes.

8 Q What other documents related to this case
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19 A I haven't been able to obtain those boxes.
20 I can't get them sent back up to me. It's going to
21 cost me a large amount of money. And right now I'm
22 trying to look after my family, so I'm not able to
23 afford to get them up.

24 Q You live in Australia, correct?

25 A I do.

1 Q Okay. How far away are the boxes from
2 where you live in Australia?

3 A Sydney is down here at the bottom. Cairns
4 is up here at the top.

5 Q Okay.

6 A It's probably a six-day drive.

7 Q Did you fly here through Sydney?

8 A No.

9 Q Have you been to Sydney since you've moved
10 back to Australia?

11 A I flew into Sydney with my three kids, but
12 it was a connecting flight to Brisbane.

13 Q Did you ask your nephews or anyone else to
14 search those boxes in response to discovery requests
15 that we issued in this case?

16 A They are my nephews. I would never let
17 them look at those.

18 Q Other than your green spiral notebook,
19 what else did you burn in this bonfire in 2013?

20 A That was it.

21 Q That's the only thing?

22 A Yes.

23 Q Did you use wood?

24 A Yes.

25 Q Charcoal?

1 A My husband built the bonfire out of wood
2 and I don't know what else he put in it. He's the
3 one who always makes the fires, not me.

4 Q Who else was present?

5 A Just him and I.

6 Q Were your kids there?

7 A No. They were inside sleeping.

8 Q And what beach was this?

9 A It wasn't a beach. It was in my backyard.

10 Q What's your address?

11 A At that time?

12 Q Um-hum.

13 A [REDACTED]

14 Q [REDACTED]

15 A Yes.

16 Q Who were your neighbors?

17 A Sweet people. Ray and -- I could look on
18 my phone if you want.

19 Q No, thank you. Do they still live there?

20 A Yes.

21 Q Do you keep in touch with them?

22 A Last time I talked to them was a few
23 months ago.

24 Q Did they see the fire?

25 A They've seen many fires that we've had.

1 We've had lots of bonfires there.

2 Q Did you ever ride in a helicopter with
3 Ghislaine Maxwell acting as pilot of the helicopter?

4 A Yes.

5 Q Who else was on the flight?

6 A I've been on the helicopter with her
7 plenty of times. I can't mention how many people
8 were on the -- on the helicopter at the same time.

9 Q How many times?

10 A I don't know. Do you have helicopter
11 records that you could show me?

12 Q I'm asking you how many times you were on
13 the helicopter with Ghislaine Maxwell acting as the
14 pilot --

15 A It's impossible for me to answer the
16 question without having the actual physical records
17 in front of me.

18 Q I'm asking you to look into your memory
19 and tell me how many times you recall being on a
20 helicopter with Ghislaine Maxwell at the pilot seat?

21 A There is no number I can give you.
22 There's plenty of times I've been on her helicopter.

23 Q Where did you go from and to on a
24 helicopter?

25 A I believe it was -- don't quote me on this

1 because I get confused on the islands there. I want
2 to say it was St. John's. It could have been
3 St. Barts. St. John or St. Barts, and then we would
4 fly straight to Jeffrey's island.

5 Q Okay. Did you ever go anywhere else on
6 the helicopter?

7 A No.

8 Q Were you ever on the helicopter with [REDACTED]
9 [REDACTED] and Ghislaine Maxwell as the pilot of the
10 helicopter?

11 A No.

12 Q Were you ever on the helicopter with [REDACTED]
13 [REDACTED] and Ghislaine Maxwell as the
14 pilot?

15 A No.

16 Q Do you recall telling Sharon Churcher that
17 you were?

18 A No.

19 Q Did you see the press article in which
20 Sharon Churcher reported that you were?

21 MR. EDWARDS: Objection. I'd just ask
22 that if you're going to ask this witness about a
23 specific article I'd like for her to see the article.
24 Otherwise she's not going to testify about it.

25 If you have something to show her, then,

1 please.

2 Q (BY MS. MENNINGER) Do you recall seeing a
3 press article in which Sharon Churcher reported that
4 you were on a helicopter with [REDACTED] and
5 Ghislaine Maxwell as the pilot?

6 MR. EDWARDS: Again, I'll let you answer
7 the question once she's looking at the document that
8 you're being asked about.

9 MS. MENNINGER: You're not letting her
10 answer a question about whether she recalls a
11 particular press statement?

12 MR. EDWARDS: I will let her answer every
13 question about the press statement as long as she
14 sees the press statement. I'm okay with that. She
15 can answer all of them.

16 MS. MENNINGER: No, there is a rule of
17 civil procedure that allows you to direct a witness
18 not to answer a question when there's a claim of
19 privilege.

20 What privilege are you claiming to direct
21 her not to answer this question?

22 MR. EDWARDS: I thought that you wanted
23 accurate answers from this witness. If the --

24 MS. MENNINGER: I asked her if she
25 recalled something --

1 MR. EDWARDS: If the sole purpose is to
2 just to harass her --

3 MS. MENNINGER: I asked her if she
4 recalled something --

5 MR. EDWARDS: Then that's just not going
6 to be what's happening today.

7 Q (BY MS. MENNINGER) All right. So you're
8 refusing to answer a question about whether you
9 recall a particular press statement --

10 MR. EDWARDS: She's --

11 Q (BY MS. MENNINGER) -- is that true?

12 MR. EDWARDS: She is not refusing to
13 answer any questions. She --

14 A I'm not refusing to answer. I just want
15 to see the article you're talking about so I can be
16 clear in my statement.

17 Q (BY MS. MENNINGER) Do you recall seeing a
18 press article written by Sharon Churcher reporting
19 that you flew on a helicopter with [REDACTED] and
20 Ghislaine Maxwell as the pilot?

21 A No, I do not recall reading a press
22 article saying that I was on a helicopter with [REDACTED]
23 [REDACTED] as Ghislaine is the pilot.

24 Q Do you recall telling Sharon Churcher that
25 you had conversations with [REDACTED] regarding him

1 flying on a helicopter with Ghislaine Maxwell?

2 A I believe that it was taken out of
3 context. Ghislaine told me that she flew Bill
4 Clinton in. And Ghislaine likes to talk a lot of
5 stuff that sounds fantastical. And whether it's true
6 or not, that is what I do recall telling Sharon
7 Churcher.

8 Q So you told Sharon Churcher that Ghislaine
9 Maxwell is the one who told you that she flew [REDACTED]
10 [REDACTED] in the helicopter?

11 A I told Sharon Churcher that Ghislaine flew
12 [REDACTED] onto the island, based upon what
13 Ghislaine had told me.

14 Q Not based upon what [REDACTED] had told
15 you, correct?

16 A Correct.

17 Q Did you ever ask Sharon Churcher to
18 correct anything that was printed under her name,
19 concerning your stories to Sharon Churcher?

20 A I wasn't given those stories to read
21 before they were printed.

22 Q After they were printed did you read them?

23 A I tried to stay away from them. They were
24 very hard. You have to understand it was a very hard
25 time for me and my husband to have to have this

1 public -- we didn't think it was going to be this
2 publicly announced and that big. So we turned off
3 the news and we stopped reading so many things.

4 Q You didn't read the articles about your
5 stories to Sharon Churcher --

6 A I've read some articles --

7 Q Let me just finish. You did not read the
8 articles published by Sharon Churcher about your
9 stories to Sharon Churcher?

10 A I have read some articles about what
11 Sharon Churcher wrote. And a lot of the stuff that
12 she writes she takes things from my own mouth and
13 changes them into her own words as journalists do.

14 And I never came back to her and told her
15 to correct anything. What was done was done. There
16 was nothing else I can do.

17 Q So even if she printed something that were
18 untrue you didn't ask her to correct it, correct?

19 A There was things that she printed that
20 really pissed me off, but there was nothing I could
21 do about it. It's already out there.

22 Q She printed things that were untrue,
23 correct?

24 MR. EDWARDS: Objection to the form.
25 Mischaracterization.

1 A I wouldn't say that they were untrue. I
2 would just say that she printed them as journalists
3 take your words and turn them into something else.

4 Q (BY MS. MENNINGER) She got it wrong?

5 MR. EDWARDS: Object to the form.

6 Mischaracterization.

7 A In some ways, yes.

8 Q (BY MS. MENNINGER) Did she print things
9 in her articles that you did not say to her?

10 MR. EDWARDS: I object and ask that the
11 witness be given the opportunity to see the document
12 so that she can review it and answer that question
13 accurately. Otherwise she's unable to answer the
14 question. I'm not going to allow her to answer.

15 MS. MENNINGER: You know the civil rules
16 tell you not to suggest answers to your client.

17 Q (BY MS. MENNINGER) And you understand
18 your lawyer is now directing you to not all of a
19 sudden remember what your answer is. That's what
20 he's suggesting that you say. So you're not supposed
21 to listen to him suggest that to you. You're
22 supposed to tell me from your memory.

23 MR. EDWARDS: That is not what I'm --

24 Q (BY MS. MENNINGER) Did you --

25 MR. EDWARDS: That's not what I'm doing.

1 You don't get to just talk over me and
2 tell my client when not to listen to me. All you
3 have to do to get answers is show her the document
4 you're talking about, and I'll let her answer every
5 question. I don't know why we're so scared of the
6 actual documents.

7 MS. MENNINGER: I don't know why you're
8 scared of your client's recollection, Mr. Edwards.
9 But anyway --

10 MR. EDWARDS: Why would you do this to
11 her?

12 Q (BY MS. MENNINGER) Did Sharon Churcher
13 print things that you did not say?

14 MR. EDWARDS: I'm going to instruct my
15 client not to answer unless you give her what it is
16 that you're talking about that was printed. And she
17 will tell you the answer, the accurate answer to your
18 question. Just without the document to refresh her
19 recollection and see it, she's not going to answer
20 the question.

21 Q (BY MS. MENNINGER) Did Sharon Churcher
22 print things that you did not say?

23 MR. EDWARDS: Same objection. Same
24 instruction not to answer.

25 I think I've made a very clear record as

1 to why I want my client to answer all of these
2 questions, but I want her to have the fair
3 opportunity to see this document.

4 Q (BY MS. MENNINGER) Did Sharon Churcher
5 print things that you felt were inaccurate?

6 MR. EDWARDS: Same objection. Same
7 instruction. If she sees the document, she's going
8 to answer every one of these questions.

9 Q (BY MS. MENNINGER) Did any other reporter
10 print statements that you believe are inaccurate?

11 MR. EDWARDS: Same objection. Same
12 instruction.

13 Q (BY MS. MENNINGER) Did any reporter print
14 statements about Ghislaine Maxwell that were
15 inaccurate?

16 MR. EDWARDS: Same objection. Same
17 instruction.

18 This is harassing. This is harassing a
19 sexual abuse victim. And all I'm asking is for
20 fairness, that we just let her see the document so
21 she can answer this.

22 MS. MENNINGER: Mr. Edwards, please stop
23 saying anything other than an objection, what the
24 basis is, or instructing your client not to answer.

25 MR. EDWARDS: I will do that.

1 MS. MENNINGER: That's what the Federal
2 Rules of Civil Procedure provide.

3 MR. EDWARDS: I hear you. They also
4 provide for fairness and civility. And all I'm
5 asking, very calmly, is for her to see this.

6 MS. MENNINGER: Mr. Edwards, this is not
7 your deposition. I'm asking your client what she
8 remembers. If she doesn't want to talk about what
9 she remembers, then let her not answer. But you
10 cannot instruct her not to answer unless there's a
11 privilege.

12 What privilege --

13 MR. EDWARDS: I am instructing her not to
14 answer.

15 Q (BY MS. MENNINGER) All right. You are
16 refusing to answer questions about whether statements
17 to the press about Ghislaine Maxwell attributed to
18 you were inaccurate?

19 MR. EDWARDS: She's not refusing not to
20 answer.

21 A You are refusing to show me these
22 documents so I could answer properly. I would give
23 you an answer if you were to show me some documents.

24 Q (BY MS. MENNINGER) You can't say without
25 looking at a document whether the press attributed to

1 you is accurate or inaccurate?

2 A Please show me the document.

3 Q You can't say from the top of your head
4 whether any inaccurate statement has been attributed
5 to you in the press?

6 A Please show me a document and I will tell
7 you.

8 Q Are you refusing to answer my questions
9 about your knowledge of whether inaccurate statements
10 have been attributed to you in the press?

11 A Are you refusing to give me the documents
12 to look at?

13 Q Are you refusing to answer the question?

14 A I am refusing to answer the question based
15 upon the fact that you are not being fair enough to
16 let me see the document in order to give you an
17 honest answer.

18 Q Ms. Giuffre --

19 A Yes.

20 Q -- we are talking about press that has
21 been published on the Internet, correct?

22 A Yes.

23 Q Do you have access to the Internet?

24 A Yes.

25 Q Have you looked on the Internet and read

1 articles that attribute statements to you about
2 Ghislaine Maxwell?

3 A Yes.

4 Q Do you know any statement that has been
5 attributed to you in a press article on the Internet
6 about Ghislaine Maxwell that is untrue?

7 MR. EDWARDS: Same objection. Same
8 instruction.

9 A Please show me a specific document.

10 Q (BY MS. MENNINGER) Do you know of any
11 such statement about Ghislaine Maxwell attributed to
12 you by the press that is inaccurate?

13 A If you could please show me a specific
14 document.

15 Q Tell me what Sharon Churcher asked you to
16 write for her.

17 A Any knowledge that I had about my time
18 with [REDACTED]

19 Q And did you write it?

20 A Um-hum.

21 Q What did you write it in or on?

22 A Paper.

23 Q What kind of paper?

24 A Lined paper.

25 Q Was it in a book or single sheets?

1 A Single sheets.

2 Q And did you write a long document or a
3 short document? What was it?

4 A I can't recall how long the document was,
5 but I would say it would be a few pages.

6 Q And other than asking you to write
7 whatever you remember about [REDACTED] did she
8 give you any other directions about what you should
9 write?

10 A She was interested in two things, really.
11 How Epstein got away with so many counts of child
12 trafficking for sex and how [REDACTED] was
13 involved in it. Those were her two main inquiries.

14 Q What did she ask you to write?

15 A She asked me to write about [REDACTED]

16 Q Did she tell you to put it in your own
17 handwriting?

18 A No, she just asked me to write down what I
19 can remember.

20 Q Did you give her everything that you
21 wrote?

22 A Did I give her the whole entire pages that
23 I wrote?

24 Q Yes.

25 A Yeah, I wrote pages for her specifically.

1 Q In your own handwriting?

2 A In my own handwriting.

3 Q And what you wrote, was that true?

4 A Yes.

5 Q And did you get paid for those pieces of
6 paper?

7 A Not for the papers, I don't believe.

8 Q Okay. Have you gotten paid when they've
9 been reprinted?

10 A No.

11 Q Have you negotiated any deal with Radar
12 Online?

13 A No.

14 Q Have you negotiated any deal with Sharon
15 Churcher for the purpose of publishing those pieces
16 of paper?

17 A Not those pieces of paper.

18 Q When did you write those pieces of paper?

19 MR. EDWARDS: Object to the form.

20 A A week before she came out.

21 Q (BY MS. MENNINGER) And when did you give
22 them to her?

23 A When she came out.

24 Q When was that?

25 A Sometime, I believe, in early 2011.

1 Q What did you get paid for, if not for
2 those pieces of paper?

3 MR. EDWARDS: Object to the form.

4 A I was paid for the picture with [REDACTED]
5 [REDACTED] with his arm around me, Ghislaine in the
6 background. And I was paid for the, I guess, the
7 print of the stories.

8 Q (BY MS. MENNINGER) Anything else?

9 A No.

10 Q You were not paid for those pieces of
11 paper?

12 A No.

13 Q All right. And how many pieces of paper
14 did you write?

15 A Like I said, I'm rounding it around three.

16 Q Three pieces of paper?

17 A That's what I -- I don't remember to be
18 exact on a number. I'm sorry. But over three pages.

19 Q And you wrote those sometime in 2011?

20 A The week that she was coming out to see
21 me.

22 Q And you gave them to her, right?

23 A I gave them to her.

24 Q Did you keep a copy of that?

25 A No.

EXHIBIT K

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

1 **e-mailing and speaking with Sharon Churcher in 2011**
 2 **about the Vanity Fair possibly purchasing your**
 3 **photograph --**
 4 A Um-hum.
 5 **Q -- do you recall whether you shared with**
 6 **Sharon Churcher anything that you had discussed with**
 7 **your attorney, Mr. Edwards?**
 8 A In relationship to what? Like, have I
 9 identified people to her?
 10 **Q Right.**
 11 A Yes.
 12 **Q Okay. So you -- you identified people to**
 13 **her and you then looped back to her about your**
 14 **conversations with Mr. Edwards, correct?**
 15 MR. EDWARDS: Object to the form.
 16 A I'm sorry, can you rephrase? I don't
 17 understand.
 18 **Q (BY MS. MENNINGER) All right. So you**
 19 **were e-mailing with her --**
 20 A Um-hum.
 21 **Q -- getting her advice about whether or not**
 22 **to sell your [REDACTED] picture to Vanity Fair?**
 23 A Right.
 24 **Q She asked you to run some information by**
 25 **Brad --**

1 A Yes.
 2 **Q -- Edwards. And you said that you were**
 3 **going to do that?**
 4 A Um-hum.
 5 **Q And then you spoke to Mr. Edwards,**
 6 **correct?**
 7 A I don't know if I spoke to him or if I
 8 e-mailed him.
 9 **Q Okay. And then did you report back to**
 10 **Sharon Churcher what you had discussed with**
 11 **Mr. Edwards?**
 12 A I'm not too sure. Like I said, going back
 13 to the 2011 e-mails, look at this pile here. It's
 14 impossible for me to know.
 15 **Q So you were having a lot of communications**
 16 **with Sharon Churcher in 2011?**
 17 A In 2011, yes.
 18 **Q All right. And Mr. Edwards was your**
 19 **attorney in 2011, correct?**
 20 A Yes.
 21 **Q And did you ever have Sharon Churcher**
 22 **draft for you e-mail to send to Mr. Edwards?**
 23 A Yes, I believe -- I believe she did.
 24 **Q And why did she draft e-mails for you to**
 25 **send to Mr. Edwards?**

1 A I believe there was -- and this is just
 2 going off my recollection.
 3 **Q Um-hum.**
 4 A I believe there was a time when she was --
 5 oh, God, I can't remember. I really can't remember
 6 and don't want to say anything without looking at
 7 that exact e-mail. Do you have it to show me?
 8 **Q Well, I'm sure it's probably in there but**
 9 **I don't want to take the time to look for it now.**
 10 A Okay.
 11 **Q So I understand you're just repeating what**
 12 **you recall from your memory.**
 13 A Yes.
 14 **Q And it may not be accurate because you're**
 15 **not looking at the document. I've got that caveat.**
 16 **What do you recall, just as you're sitting**
 17 **there?**
 18 A I know there was e-mails that Sharon sent
 19 to me suggesting to say to Brad Edwards, I know that.
 20 I don't remember or recall exactly what was in those
 21 statements.
 22 **Q Okay. And did you send those e-mails to**
 23 **Mr. Edwards, as you recall today?**
 24 A I don't know. I'm sorry.
 25 **Q And do you know if you went back to Sharon**

1 **Churcher and told her about the conversations or**
 2 **e-mails you had with Mr. Edwards?**
 3 A Some of them, I'm sure, yes.
 4 **Q Because you were in fairly regular contact**
 5 **with Sharon Churcher at that time, correct?**
 6 A Right, at that time.
 7 **Q All right. I want to introduce to you**
 8 **Defendant's Exhibit 26.**
 9 **(Exhibit 26 marked.)**
 10 **Q (BY MS. MENNINGER) Have you seen this**
 11 **document before?**
 12 A I don't know if I've seen this specific
 13 document before, but I've seen something close to it,
 14 I think.
 15 **Q All right. Do you see the date on the**
 16 **document?**
 17 A March 10th, 2011.
 18 **Q March 9th?**
 19 A I see March 10th, sorry.
 20 **Q Hmm.**
 21 A London, March 10th, 2011.
 22 MR. EDWARDS: Both dates are there.
 23 MS. MENNINGER: I'm sure they are. I'm
 24 just not seeing the one that you're seeing.
 25 THE DEPONENT: Oh, I'm sorry.

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**NON-REDACTED DECLARATION OF SIGRID S. MCCAWLEY IN SUPPORT OF
PLAINTIFF VIRGINIA GIUFFRE'S RESPONSE TO MOTION TO COMPEL
ATTORNEY-CLIENT COMMUNICATIONS AND ATTORNEY WORK PRODUCT
MATERIALS**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am an associate with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in support of Plaintiff Virginia Giuffre's Response in Opposition to Defendant's Motion to Compel Attorney Client Communications and Attorney Work Product Materials.
3. Attached hereto as Exhibit 1, is a true and correct copy of Emergency Petition (CVRA Complaint) filed in Jane Doe 1 v. United States, No. 9:08-cv-80736 (S.D. Fla. July 7, 2008).

4. Attached hereto as Exhibit 2, is a true and correct copy of the Jane Does' 3 and 4 Corrected Joinder Motion (filed under seal).
5. Attached hereto as Exhibit 3, Response to Motion to Intervene (filed under seal).
6. Attached hereto as Exhibit 4, Order denying Jane Doe 3's motion to join.
7. Attached hereto as Exhibit 5, is a true and correct copy of the Complaint in Edwards and Cassell v. Dershowitz.
8. Attached hereto as Exhibit 6 is a true and correct copy of Motion to Compel.
9. Attached hereto as Exhibit 7 is a true and correct copy of Response in Opposition to Motion to Compel.
10. Attached hereto as Exhibit 8 is a true and correct copy of Reply in Support of Motion to Compel.
11. Attached hereto as Exhibit 9 is a true and correct copy of Sur-Reply in Support Opposition to Motion to Compel
12. Attached hereto as Exhibit 10 is a true and correct copy of Order Denying Motion to Compel.
13. Attached hereto as Exhibit 11 is a true and correct copy of Composite Exhibit of Deposition Excerpts from the Deposition of Virginia Giuffre, at 22-23, 131-32; 173-74; 183; 200-12 (filed under seal).
14. Attached hereto as Exhibit 12 is a true and correct copy of Notice of Withdrawal of Summary Judgment Motion.
15. Attached hereto as Exhibit 13 is a true and correct copy of Affidavit of Ms. Giuffre (May 30, 2016).

16. Attached hereto as Exhibit 14 is a true and correct copy of Deposition excerpt of Paul Cassell, Volume I, dated Oct. 16, 2015, at 39:24 – 40:2.

17. Attached hereto as Exhibit 15 is a true and correct copy of Transcript of Scarola/Edwards interview on April 7, 2011.

18. Attached hereto as Exhibit 16 is a true and correct copy of Common interest agreement.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid McCawley
Sigrid McCawley

Dated: June 1, 2016

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 4, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

EXHIBIT 2
(Filed Under Seal)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE #3 AND JANE DOE #4's CORRECTED MOTION PURSUANT TO RULE 21
FOR JOINDER IN ACTION**

COME NOW Jane Doe #3 and Jane Doe #4 (also referred to as "the new victims"), by and through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as "the current victims"). The new victims have suffered the same violations of their rights under the Crime Victims' Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may "at any time" add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.¹

FACTUAL BACKGROUND

¹ As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this fashion. Counsel for the new victims have made their true identities known to the Government.

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (inter alia) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

Jane Doe #3's Circumstances

As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by Epstein. The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA. If allowed to join this action, Jane Doe #3 would prove the following:

In 1999, Jane Doe #3 was approached by Ghislaine Maxwell, one of the main women whom Epstein used to procure under-aged girls for sexual activities and a primary co-conspirator in his sexual abuse and sex trafficking scheme. In fact, it became known to the government that Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3. Maxwell persuaded Jane Doe #3 (who was then fifteen years old) to come to Epstein's mansion in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children (including Jane Doe #1 and Jane Doe #2). When Jane Doe #3 began giving Epstein a "massage," Epstein and Maxwell turned it into a sexual encounter, as they had done with many other victims. Epstein then became enamored with Jane Doe #3, and with the assistance of Maxwell converted her into what is commonly referred to as a "sex slave." Epstein kept Jane Doe #3 as his sex slave from about 1999 through 2002, when she managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years. From 1999 through 2002, Epstein frequently sexually abused Jane Doe #3, not only in West Palm Beach, but also in New York, New Mexico, the U.S. Virgin Islands, in international airspace on his Epstein's private planes, and elsewhere.

Epstein also sexually trafficked the then-minor Jane Doe, making her available for sex to politically-connected and financially-powerful people. Epstein's purposes in "lending" Jane Doe (along with other young girls) to such powerful people were to ingratiate himself with them for

business, personal, political, and financial gain, as well as to obtain potential blackmail information.

One such powerful individual that Epstein forced then-minor Jane Doe #3 to have sexual relations with was former Harvard Law Professor Alan Dershowitz, a close friend of Epstein's and well-known criminal defense attorney. Epstein required Jane Doe #3 to have sexual relations with Dershowitz on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands. In addition to being a participant in the abuse of Jane Doe #3 and other minors, Dershowitz was an eye-witness to the sexual abuse of many other minors by Epstein and several of Epstein's co-conspirators. Dershowitz would later play a significant role in negotiating the NPA on Epstein's behalf. Indeed, Dershowitz helped negotiate an agreement that provided immunity from federal prosecution in the Southern District of Florida not only to Epstein, but also to "any potential co-conspirators of Epstein." NPA at 5. Thus, Dershowitz helped negotiate an agreement with a provision that provided protection for himself against criminal prosecution in Florida for sexually abusing Jane Doe #3. Because this broad immunity would have been controversial if disclosed, Dershowitz (along with other members of Epstein's defense team) and the Government tried to keep the immunity provision secret from all of Epstein's victims and the general public, even though such secrecy violated the Crime Victims' Rights Act.

Ghislaine Maxwell was another person in Epstein's inner circle and a co-conspirator in Epstein's sexual abuse. She was someone who consequently also appreciated the immunity granted by the NPA for the crimes she committed in Florida. In addition to participating in the sexual abuse of Jane Doe #3 and others, Maxwell also took numerous sexually explicit pictures

of underage girls involved in sexual activities, including Jane Doe #3. She shared these photographs (which constituted child pornography under applicable federal laws) with Epstein. The Government is apparently aware of, and in certain instances possesses some of these photographs.

Perhaps even more important to her role in Epstein's sexual abuse ring, Maxwell had direct connections to other powerful individuals with whom she could connect Epstein. For instance, one such powerful individual Epstein forced Jane Doe #3 to have sexual relations with was a member of the British Royal Family, Prince Andrew (a/k/a Duke of York). Jane Doe #3 was forced to have sexual relations with this Prince when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell's apartment), in New York, and on Epstein's private island in the U.S. Virgin Islands (in an orgy with numerous other under-aged girls). Epstein instructed Jane Doe #3 that she was to give the Prince whatever he demanded and required Jane Doe #3 to report back to him on the details of the sexual abuse. Maxwell facilitated Prince Andrew's acts of sexual abuse by acting as a "madame" for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other young girls) for sexual purposes.

Another person in Epstein's inner circle of friends (who becomes apparent with almost no investigative effort) is Jean Luc Brunel. Epstein sexually trafficked Jane Doe #3 to Jean Luc Brunel many times. Brunel was another of Epstein's closest friends and a regular traveling companion, who had many contacts with young girls throughout the world. Brunel has been a model scout for various modeling agencies for many years and apparently was able to get U.S. passports for young girls to "work" as models. He would bring young girls (ranging to ages as

young as twelve) to the United States for sexual purposes and farm them out to his friends, especially Epstein. Brunel would offer the girls “modeling” jobs. Many of the girls came from poor countries or impoverished backgrounds, and he lured them in with a promise of making good money. Epstein forced Jane Doe #3 to observe him, Brunel and Maxwell engage in illegal sexual acts with dozens of underage girls. Epstein also forced Jane Doe #3 to have sex with Brunel on numerous occasions, at places including Epstein’s mansion in West Palm Beach, Little St. James Island in the U.S. Virgin Islands (many including orgies that were comprised of other underage girls), New York City, New Mexico, Paris, the south of France, and California.

Epstein also trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders. Epstein required Jane Doe #3 to describe the events that she had with these men so that he could potentially blackmail them.

The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3’s relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make \$300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. *See* 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

MOTION FOR JOINDER

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation." *Ford v. Air Line Pilots Ass'n Int'l*, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. *See, e.g.*, DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. *See, e.g.*, DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. *See, e.g.*, DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has directly person knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the

new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. *See* DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.² Accordingly, the United States will not be prejudiced or burdened by adding them to this case.

The CVRA does not contain any statute of limitations for filing an action to enforce rights under the statute. Accordingly, were the Court to deny this motion, the result might be that the new victims would then be forced to file a separate suit raising their claims, which would then possibly proceed on a separate litigation track. Rather than require duplicative litigation, the Court should simply grant their motion to join.

Jane Doe #1 and Jane Doe #2 support the joinder motion. Counsel for the victims have discussed this motion with the Government at length in an effort to avoid any need to file a substantive pleading on the issue. Counsel for the victims asked the Government during the summer for its position on joinder. The Government, however, took the matter under advisement for months. Ultimately, after several inquiries from victims counsel, the Government indicated without explanation that it opposes this motion. Counsel for the victims has requested a meeting with the Government on this issue, which will hopefully occur in

² Jane Doe #3 and Jane Doe #4 have asked the Government to provide them with the record of their statements that they provided to the FBI. These FBI 302's should be only a few pages long.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: January 2, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on January 2, 2015, on the following using the Court's CM/ECF system:

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/s/ Bradley J. Edwards

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration Of Laura A. Menninger In Support Of
Defendant's Response in Opposition to Motion To Exceed
Presumptive Ten Deposition Limit**

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of Ms. Maxwell's Response in Opposition to Motion To Exceed Presumptive Ten Deposition Limit.
2. Attached as Exhibit A (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in the above captioned matter on May 3, 2016, and designated by Plaintiff as Confidential under the Protective Order.

By: /s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on June 6, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Response in Opposition to Motion To Exceed Presumptive Ten Deposition Limit* via ECF on the following:

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/s/ Nicole Simmons
Nicole Simmons

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**DECLARATION OF SIGRID S. McCawley IN SUPPORT OF PLAINTIFF'S
REPLY TO MOTION TO EXCEED PRESUMPTIVE TEN DEPOSITION LIMIT**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's September 29, 2015 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in Support of Plaintiff's Reply to Motion to Exceed Presumptive Ten Deposition Limit.
3. Attached hereto as Exhibit 1 is a true and correct copy of [REDACTED] Deposition Transcript excerpts dated May 18, 2016.
4. Attached hereto as Exhibit 2 is a true and correct copy of [REDACTED] Rough Deposition Transcript excerpts dated June 10, 2016.
5. Attached hereto as Exhibit 3 is a true and correct copy of Juan Alessi's Deposition Transcript excerpts dated June 1, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Dated: June 13, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th day of June, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
Sigrid S. McCawley

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____ /

**CORRECTED¹ DECLARATION OF SIGRID S. McCRAWLEY IN SUPPORT OF
PLAINTIFF’S REPLY TO MOTION TO EXCEED PRESUMPTIVE TEN DEPOSITION
LIMIT**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court’s September 29, 2015 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff’s Reply to Motion to Exceed Presumptive Ten Deposition Limit.

3. Attached hereto as Exhibit 1 is a true and correct copy of _____
Deposition Transcript excerpts dated May 18, 2016.

4. Attached hereto as Exhibit 2 is a true and correct copy of _____ **Final**
Deposition Transcript excerpts dated June 10, 2016.

¹ On June 13, 2016, Ms. Giuffre filed her Reply in Support of her Motion to Exceed the Presumptive Ten Deposition Limit (DE 203). This brief contained excerpts from _____ “rough” deposition transcript, as the final transcript had not yet been completed by the stenographer. On June 14, 2016, the stenographer issued the “final” deposition transcript, and Ms. Giuffre hereby files the final transcript citations and excerpts to replace the “rough” transcript that accompanied her supporting Declaration (DE 204-2). There are no other changes to this document.

5. Attached hereto as Exhibit 3 is a true and correct copy of Juan Alessi's

Deposition Transcript excerpts dated June 1, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Dated: June 14, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of June, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
Sigrid S. McCawley

EXHIBIT J

From: jeffrey E. <jeevacation@gmail.com>
Sent: Wednesday, January 21, 2015 12:01 PM
To: Gmax

Since JE was charged in 2007 for solicitation of a prostitute I have been the target of outright lies, innuendo, slander, defamation and salacious gossip and harrasment; headlines made up of quotes I have never given, statements I have never made, trips with people to places I have never been, holidays with people I have never met, false allegations of impropriety and offensive behavior that I abhor and have never ever been party to, witness to events that I have never seen, living off trust funds that I have never ever had, party to stories that have changed materially both in time place and event depending on what paper you read, and the list goes on.

I have never been a party in any criminal action pertaining to JE

For the record:

At the time of Jeffrey's plea I was in a very long-term committed relationship with another man and no longer working with Jeffrey. Whilst I remained on friendly terms with him up until his plea, , I have had limited contact since

Every story in the press innuendo and comment has been taken from civil depositions against JE, which were settled many years ago. None of the depositions were ever subject to cross examination , not one. any

standard of truth and were used for those who claimed they were victims to receive financial payment to be shared between them and their lawyers. One firm created and sold fake cases against Mr. Epstein – the firm subsequently imploded and the Rothstein, the owner of the firm was sent to jail for 50 years for his crime. The lawyer who is currently representing Virginia was his partner. need I say more!

These so called ‘new revelations’ stem from an alleged diary from VR that reads like the memoirs she is purporting to be selling. Also perhaps pertinent - in a previous complaint against others, her claims were rejected by the police

“due to.. VR ..lack of credibility ”

The new interest in this old settled case results from lawyers representing some of JE victims filed a suit against the US government not JE . They contend that the Us govt violated their rights.

The document and deal that JE negotiated with the government was given to the lawyers 6 years ago and is a public document.

I am not part of, nor did you have anything to do with, JE plea bargain

I have never even seen the proceedings nor any of the depositions

I reserve my right to file complaint and sue for defamation and slander

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

From: jeffrey E. <jeevacation@gmail.com>
Sent: Sunday, January 25, 2015 4:41 AM
To: G Maxwell
Subject: Re:

ok, with me, You have done nothing wrong and i would urge you to start acting like it. go outside, head high, not as an escaping convict. go to parties. deal with it. . i had lisa svenson the swedish ocean ambassador yesteady she said no one on her ocean panel takes this stuff seriously and you would be welcoe to the ocean conferenece water conference etc.

On Sat, Jan 24, 2015 at 1:22 PM, G Maxwell <GMax1@ellmax.com> wrote:
I would appreciate it if shelley would come out and say she was your g'friend - I think she was from end 99 to 2002

THE TERRAMAR PROJECT
FACEBOOK
TWITTER
G+
PINTEREST
INSTAGRAM
PLEDGE
THE DAILY CATCH

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

EXHIBIT K

From: [Meredith Schultz](#)
To: [Laura Menninger](#)
Cc: [Sigrid McCawley](#); [Paul Cassell \(cassellp@law.utah.edu\)](#); ["brad@pathtojustice.com" \(brad@pathtojustice.com\)](#); [Jeff Pagliuca](#)
Subject: Notice of Subpoena
Date: Tuesday, May 17, 2016 5:10:02 AM
Attachments: [2016-05-16 Notice of Service & Subpoena for Deposition to \[REDACTED\]](#)

Laura,

Please see the attached.

Thanks,

Meredith

Meredith L. Schultz
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**DECLARATION OF JEFFREY S. PAGLIUCA IN SUPPORT OF DEFENDANT’S
COMBINED RESPONSE TO PLAINTIFF’S MOTION TO COMPEL DEFENDANT
TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL AND MOTION
TO TERMINATE OR LIMIT PURSUANT TO F.R.CIV.P. 30(d)(3)**

I, Jeffrey S. Pagliuca, declare as follows:

1. I am an attorney at law duly licensed in the State of Colorado and admitted to practice in the United States District Court for the Southern District of New York pro hac vice. I am a member of the law firm Haddon, Morgan and Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell (“Maxwell”) in this action. I respectfully submit this declaration in support of Maxwell’s Combined Response to Plaintiff’s Motion to Compel Defendant to Answer Deposition Questions Filed Under Seal and Motion to Terminate or Limit Pursuant to F.R.Civ.P. 30(d)(3).

2. Attached as Exhibit A is a true and correct copy of composite pages from Defendant’s April 22 ,2016 Deposition Transcript.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
May 10, 2016 in Denver, Colorado.

By: /s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on May 10, 2016, I electronically served this *DECLARATION OF JEFFREY S. PAGLIUCA IN SUPPORT OF DEFENDANT'S COMBINED RESPONSE TO PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL AND MOTION TO TERMINATE OR LIMIT PURSUANT TO F.R.CIV.P. 30(d)(3)* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons

EXHIBIT D

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

Page 1

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.

APPEARANCES:

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7 Phone: 303.831.7364
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9 jpagliuca@hmflaw.com
10 Appearing on behalf of the
11 Defendant
12
13 Also Present:
14 Brenda Rodriguez, Paralegal
15 Nicholas F. Borgia, CLVS Videographer
16
17
18
19
20
21
22
23
24
25

Page 3

1 Pursuant to Notice and the Federal Rules
2 of Civil Procedure, the VIDEOTAPED DEPOSITION OF
3 VIRGINIA GIUFFRE, called by Defendant, was taken on
4 Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150
5 East 10th Avenue, Denver, Colorado, before Kelly A.
6 Mackereth, Certified Shorthand Reporter, Registered
7 Professional Reporter, Certified Realtime Reporter
8 and Notary Public within Colorado.

9 * * * * *
10 I N D E X

11 EXAMINATION PAGE
12 MS. MENNINGER 8

13 PRODUCTION REQUEST(S):
14 (None.)
15
16
17
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Page 7

1 * * * * *

2 P R O C E E D I N G S

3 THE VIDEOGRAPHER: We're on the record at

4 9 a.m. Today is May 3rd, 2016. This begins the

5 videotaped deposition of Virginia Giuffre in the

6 matter of Virginia L. Giuffre versus Ghislaine

7 Maxwell.

8 We're located at 150 East 10th Street --

9 excuse me, 10th Ave., in Denver, Colorado.

10 Our court reporter is Kelly Mackereth.

11 The videographer is Nicholas F. Borgia, CLVS.

12 Will counsel please introduce yourselves

13 for the record.

14 MR. EDWARDS: Sure. Brad Edwards and

15 Sigrid McCawley on behalf of the plaintiff,

16 Ms. Giuffre.

17 MS. MENNINGER: Laura Menninger and

18 Jeffrey Pagliuca on behalf of the defendant,

19 Ghislaine Maxwell.

20 THE VIDEOGRAPHER: And will our court

21 reporter please swear in the deponent.

22 VIRGINIA GIUFFRE,

23 being first duly sworn in the above cause, was

24 examined and testified as follows:

25 MR. EDWARDS: Just before we get started,

Page 8

1 I just wanted to make sure that we're clear, and I

2 think that we are, that this deposition in total will

3 be treated as confidential until such time as we are

4 able to review and de-designate.

5 MS. MENNINGER: Yes.

6 MR. EDWARDS: Okay.

7 EXAMINATION

8 BY MS. MENNINGER:

9 **Q Good morning, Ms. Giuffre.**

10 A Good morning, Laura.

11 **Q Can you please state your full name?**

12 A Virginia Lee Giuffre.

13 **Q And where do you live right now,**

14 **Ms. Giuffre?**

15 A [REDACTED]

16 [REDACTED]

17 **Q All right. And who lives with you there?**

18 A My son, my other son, my daughter, my

19 husband and my in-laws.

20 **Q And when did you return to the U.S. for**

21 **this visit?**

22 A I believe it was around Thursday, the

23 29th, I think.

24 **Q Okay. And who traveled with you?**

25 A Myself.

Page 9

1 **Q Yourself?**
 2 A Yes.
 3 **Q Are you able to travel freely between the**
 4 **U.S. and Australia?**
 5 A Yes.
 6 **Q Are you married?**
 7 A Yes.
 8 **Q To whom?**
 9 A [REDACTED]
 10 **Q All right. And did Mr. Giuffre travel**
 11 **with you back to the U.S.?**
 12 A No.
 13 **Q All right. Have you taken any medications**
 14 **in the last 24 hours?**
 15 A I have taken -- I have a cold, but I have
 16 taken non-drowsy cold tablets and some DayQuil.
 17 **Q All right. Anything else?**
 18 A No.
 19 **Q All right. And what is your current**
 20 **profession, Ms. Giuffre?**
 21 A I'm a housewife.
 22 **Q All right. And how long have you been a**
 23 **housewife?**
 24 A For the last ten years, since I've had
 25 kids.

Page 10

1 **Q All right. And what was your profession**
 2 **in 2014?**
 3 A A housewife.
 4 **Q All right. Any other profession?**
 5 A No.
 6 **Q All right. You understand that you're**
 7 **under oath today?**
 8 A Yes.
 9 **Q And you understand that if you don't**
 10 **understand a question, you need to let me know that.**
 11 A Okay.
 12 **Q And ask for clarification.**
 13 A Um-hum.
 14 **Q Do you understand?**
 15 A Yes.
 16 **Q You also understand, I'm assuming, that**
 17 **you have to say yes or no in answer to a question, or**
 18 **you have to make a verbal response and not just shake**
 19 **your head or something --**
 20 A Yes.
 21 **Q -- so the court reporter can get it.**
 22 **You have -- you have been deposed before,**
 23 **correct?**
 24 A Yes.
 25 **Q Do you understand what it means to be**

Page 11

1 **under oath?**
 2 A Yes.
 3 **Q What does it mean to you?**
 4 A To tell the truth, the whole truth and
 5 nothing but the truth.
 6 **Q All right. And what does the word truth**
 7 **mean to you?**
 8 A To be honest.
 9 **Q Is there more than one truth?**
 10 A Is there more than -- no, there's no more
 11 than one truth.
 12 **Q If you are confused by a question, you**
 13 **need to let me know that so I can clarify the**
 14 **question, okay?**
 15 A Okay.
 16 **Q For example, if I asked you the question**
 17 **were you sexually trafficked to foreign presidents,**
 18 **do you understand what that question means?**
 19 A Yes.
 20 **Q What does it mean?**
 21 A Was I lent out for the purposes of sex to
 22 a foreign person -- president.
 23 **Q All right. And what is the answer to that**
 24 **question?**
 25 A Yes.

Page 12

1 **Q And if I ask you have you met any foreign**
 2 **presidents, do you understand what that question**
 3 **means?**
 4 A Yes.
 5 **Q And what is the answer to that question?**
 6 A Yes.
 7 **Q All right. And if I asked you which**
 8 **foreign presidents have you met, do you understand**
 9 **what that question means?**
 10 A Yes.
 11 **Q What is the answer to that question?**
 12 A What is the name of the person?
 13 **Q Yes. Who are the foreign presidents that**
 14 **you have met?**
 15 A I honestly can't remember his name at this
 16 time. I'm a very visual person so --
 17 **Q All right. Can you describe him, then?**
 18 A Yes. He's Spanish.
 19 **Q Okay.**
 20 A Tall, dark hair.
 21 **Q All right. Anything else?**
 22 A And he's got a foreign tongue, accent.
 23 **Q And what age, approximately?**
 24 A Was I or was he?
 25 **Q Was he.**

1 A I'd say in his 40s.

2 **Q Okay. And where did you meet him?**

3 A I believe it was New Mexico.

4 **Q New Mexico?**

5 A Possibly New Mexico. I'm sorry. It's

6 really hard to go back and remember lots of different

7 events with lots of different people.

8 **Q Okay. And is that the only foreign**

9 **president that you have met?**

10 A I've met a lot of very high, powerful

11 people and I wasn't just introduced to them as who

12 they were. It's only going back through photos in

13 time to be able to realize who they are and what they

14 are now. So it's hard for me to distinguish who I've

15 actually met and when and where I've met them.

16 **Q So to your knowledge, you have only met**

17 **one foreign president?**

18 A To my knowledge at this time, yes.

19 **Q And is there anything that might change**

20 **your knowledge at a different time?**

21 A If I were to see more photos of other

22 people. I mean, I've been able to distinguish the

23 majority of the people I've been lent out to, but

24 who's to say there's not more.

25 **Q All right. If I were to ask you the**

1 **question how many times have you had sex with [REDACTED]**

2 **[REDACTED] do you know what that question means?**

3 A I believe so.

4 **Q All right. And what is the answer to that**

5 **question?**

6 A I believe I was with [REDACTED] once.

7 **Q Okay. I would like to ask you about your**

8 **prior sworn statement.**

9 **You understand you're under oath today,**

10 **correct?**

11 A Yes.

12 **Q All right. You've previously made**

13 **statements under oath, correct?**

14 A Yes.

15 **Q And you've previously authorized pleadings**

16 **to be filed on your behalf, correct?**

17 A Yes.

18 **Q By various attorneys, right?**

19 A Yes.

20 **Q All right. You have included in your**

21 **sworn statement allegations about my client,**

22 **Ghislaine Maxwell, correct?**

23 A Yes.

24 **Q And did you review any of those prior**

25 **sworn statements before appearing here today?**

1 A Yes.

2 **Q And which ones did you review?**

3 A I'd have to see which ones you're

4 specifically talking about. There's quite a lot of

5 statements I've made.

6 **Q Right. And which ones do you recall**

7 **having reviewed before you attended this deposition**

8 **today?**

9 A I've reviewed my affidavit. I'm not a

10 lawyer so I really don't know legal terms to half of

11 the, you know, legal jargon of statements, which they

12 are. If you showed me, I'd be able to tell you if

13 I've seen it or not.

14 **Q Okay. So to your knowledge, can you**

15 **identify any sworn statement you reviewed before**

16 **attending the deposition today?**

17 A Could I name what the statement is?

18 **Q Right.**

19 A The actual piece of paper that has the

20 title at the top?

21 **Q Right.**

22 A No, I don't.

23 **Q Can you describe it in any other fashion?**

24 A I don't understand. I'm sorry.

25 **Q That's all right. You have to tell me if**

1 **you don't.**

2 **Do you have any reason to believe that any**

3 **of your previous sworn statements that you have made**

4 **are not true?**

5 A No.

6 MR. EDWARDS: I just object and ask that

7 if we're going to ask the witness questions about any

8 of her statements in whole or in part that the

9 witness be allowed to see the statement, review the

10 statement and then answer your questions.

11 **Q (BY MS. MENNINGER) You may answer the**

12 **question.**

13 A Can you reask the question? I'm sorry.

14 **Q Do you have any reason to believe that any**

15 **of your prior sworn statements are untrue?**

16 A I have no reason to believe that my prior

17 statements are untrue.

18 **Q Has anyone told you to say something that**

19 **was not true in connection with this case?**

20 A No, ma'am.

21 **Q All right. I'd like to start with a**

22 **lawsuit that you filed under the caption Jane Doe**

23 **versus Jeffrey Epstein.**

24 **Do you recall that lawsuit?**

25 A I believe so.

Page 17

1 (Exhibit 1 marked.)

2 **Q (BY MS. MENNINGER) I'm going to show you**

3 **an exhibit that we are marking as Defendant's**

4 **Exhibit 1.**

5 MR. EDWARDS: Can I see that for a second?

6 I'd just like to make an objection on the

7 record for the misidentification of this document.

8 While there was a lawsuit filed under the

9 style of Jane Doe versus Jeffrey Epstein, Jane Doe

10 was not Virginia Giuffre. And the lawsuit that's now

11 being handed to this witness is Jane Doe 102 versus

12 Jeffrey Epstein.

13 Is that the document we're talking about?

14 MS. MENNINGER: Counsel, if you have an

15 objection, you should state the basis for your

16 objection in a non-leading, non-suggestive manner.

17 If you have any other record to make, you

18 can do so in a pleading filed with the Court.

19 MR. EDWARDS: Sure. My objection is

20 you've misrepresented what you've handed the witness.

21 I want to make sure that the witness is holding what

22 you actually want her to be holding as opposed to the

23 lawsuit you said that you were going to hand her.

24 That's it.

25 MS. MENNINGER: Counsel, I will ask the

Page 18

1 witness questions about the document. I did not ask

2 you any questions about the document.

3 **Q (BY MS. MENNINGER) Ms. Giuffre, could you**

4 **please take a look at what we have marked as**

5 **Defendant's Exhibit 1.**

6 **Do you recognize that document,**

7 **Ms. Giuffre?**

8 A I believe so. Yes. Yes, I do.

9 **Q And do you see that the counsel on the**

10 **last page -- I'm sorry, not the last page, but the**

11 **third from the last page are Mr. Josefsberg and**

12 **Ms. Ezell from Podhurst Orseck?**

13 A Yes.

14 **Q Were those your lawyers?**

15 A Yes, they were.

16 **Q And did you authorize them to file Jane**

17 **Doe 102 versus Epstein on your behalf?**

18 A Yes, I did.

19 **Q And is that this complaint that's been**

20 **marked as Defendant's Exhibit 1?**

21 A I believe so.

22 **Q In that document, if I could ask you to**

23 **turn to page -- well, I'll turn to page 9 and**

24 **paragraph 23.**

25 A Would you like me to read it?

Page 19

1 **Q No. I'm just -- did you find it?**

2 A I can see paragraph 23.

3 **Q Okay. And do you see that there are**

4 **allegations about a Ms. Maxwell contained in that**

5 **complaint?**

6 A Yes, I do.

7 **Q All right. And do you understand that to**

8 **be Ghislaine Maxwell, my client?**

9 A Yes.

10 **Q All right. And Ms. Maxwell was not sued**

11 **as a part of this case, correct?**

12 MR. EDWARDS: Object to the form.

13 THE DEPONENT: Does that mean I can

14 answer?

15 MR. EDWARDS: Sure, you can answer.

16 MS. MENNINGER: Right.

17 MR. EDWARDS: If you understand the

18 question, answer it.

19 A Yes, Ms. Maxwell -- sorry, repeat the

20 question.

21 **Q (BY MS. MENNINGER) Was Ms. Maxwell sued**

22 **in this --**

23 A No, she wasn't.

24 **Q -- in the case that's represented by**

25 **Defendant's Exhibit 1?**

Page 20

1 A No, she wasn't. I'm sorry for

2 interrupting you. But no, she was not sued at this

3 time, no.

4 **Q And why not?**

5 MR. EDWARDS: I'd object and ask the

6 witness not answer that question because that would

7 be privileged, attorney-client privileged,

8 information that was between Ms. Giuffre and the

9 Podhurst Orseck firm at that time.

10 So I'm instructing you not to answer.

11 **Q (BY MS. MENNINGER) All right.**

12 **Ms. Giuffre, did you make a decision yourself whether**

13 **or not to sue Ms. Maxwell as a part of this lawsuit**

14 **against -- Jane Doe 102 versus Jeffrey Epstein?**

15 A I think I've been advised not to answer

16 that question.

17 **Q This is a different question.**

18 A Oh, okay.

19 **Q So your counsel can assert a privilege,**

20 **but that question did not call for privileged**

21 **information.**

22 MR. EDWARDS: I --

23 **Q (BY MS. MENNINGER) I'm asking about what**

24 **-- what you decided to do. Whether you decided to**

25 **sue Ms. Maxwell or not at the time Jane Doe 102**

Page 21

1 **versus Epstein was filed?**
 2 MR. EDWARDS: And I disagree. And I
 3 object to this invading the attorney-client
 4 privilege.
 5 And I'm instructing you not to answer.
 6 **Q (BY MS. MENNINGER) Can you answer that**
 7 **question without revealing any attorney-client**
 8 **communications, whether you made a decision to file a**
 9 **lawsuit or not?**
 10 A I'm going to have to listen to my attorney
 11 and not answer the question.
 12 **Q All right. I would like to show you some**
 13 **documents that were filed in what we'll call the CVRA**
 14 **case, the Crime Victims' Rights Act case.**
 15 **Do you know what I mean by that reference?**
 16 A I am familiar with that.
 17 **Q Okay. I'm going to start with one on or**
 18 **about December 30th, 2014. We will mark it as**
 19 **Defendant's Exhibit 2.**
 20 **(Exhibit 2 marked.)**
 21 MR. EDWARDS: Thank you.
 22 **Q (BY MS. MENNINGER) All right.**
 23 **Ms. Giuffre, do you recognize Defendant's Exhibit 2?**
 24 A Yes.
 25 **Q And what do you understand it to be?**

Page 22

1 A I believe this is when I was hoping to
 2 join the CVRA case.
 3 **Q All right. And do you know when this**
 4 **document was filed?**
 5 **And actually, just to be clear, about**
 6 **halfway there's actually a second document that was**
 7 **filed. So this is a composite exhibit. Let me be**
 8 **very clear.**
 9 **So after page 14 -- I'm sorry, 13, there's**
 10 **a second document that is styled Jane Doe #3 and Jane**
 11 **Doe #4's Corrected Motion Pursuant to Rule 21 for**
 12 **Joinder In Action.**
 13 **Do you see that?**
 14 A Did you say page 14?
 15 **Q It is on the 14th page of this document.**
 16 **Do you see that?**
 17 A I do.
 18 **Q And so this composite Exhibit 2 has both a**
 19 **motion and a corrected motion.**
 20 **Do you see that?**
 21 A Yes.
 22 **Q And were both of those pleadings**
 23 **authorized by you to be filed?**
 24 A Yes.
 25 **Q In other words, you wanted to join the**

Page 23

1 **CVRA action in or about December 30th, 2014, correct?**
 2 A I -- I'm not aware of the exact dates.
 3 There's no dates on this. But I did try to join the
 4 motion, yes.
 5 **Q All right. If you can look at the top**
 6 **line of the document.**
 7 A Yes.
 8 **Q Does it say, Entered on FLSD --**
 9 A Oh, it does, too, I'm sorry, yes.
 10 **Q That's all right. So does that refresh**
 11 **your memory as to about when you first sought to join**
 12 **the CVRA action?**
 13 A Yes.
 14 **Q December 30th, 2014, correct?**
 15 A Yes.
 16 **Q And the corrected motion was filed a few**
 17 **days later, correct?**
 18 A Yes, correct.
 19 **Q If I could turn to Defendant's Exhibit 3,**
 20 **which was January 21st.**
 21 **(Exhibit 3 marked.)**
 22 MR. EDWARDS: Thank you.
 23 **Q (BY MS. MENNINGER) Do you recognize this**
 24 **document?**
 25 A Yes, I do.

Page 24

1 **Q What do you understand this document to**
 2 **be?**
 3 A It's a rough background of the years that
 4 I was abused by Ghislaine and Jeffrey.
 5 **Q All right. And this is something I**
 6 **believe that you on page 15 signed; is that true?**
 7 A Just let me have a look.
 8 **Q Sure.**
 9 A I think I'm actually missing page 15. Oh,
 10 here we go.
 11 **Q Sorry. I'm looking at the numbers on the**
 12 **top right. I apologize. I believe there was some**
 13 **cover page or something that was excluded.**
 14 MR. EDWARDS: And just for the record, I'm
 15 going to object to the relevance of this document.
 16 I'm going to allow the witness to answer the
 17 question, but I want my objection on the record.
 18 MS. MENNINGER: Okay. Simple objection,
 19 relevance.
 20 A Are we talking about this page?
 21 **Q (BY MS. MENNINGER) Yes, the one with the**
 22 **black box, yes. Do you believe that to have**
 23 **contained your signature?**
 24 A Yes.
 25 **Q All right. And you executed that on**

Page 25

1 **January 19th, 2015?**

2 A At the very top of the page it says

3 January 21st, 2015.

4 **Q The date it was filed. Is there a date**

5 **just above the signature block?**

6 A Oh, yes, sorry. Yes, there is.

7 **Q And what date -- what date was that?**

8 A The 19th day of January, 2015.

9 **Q Okay. And this document is something that**

10 **you believe contains the truth, correct?**

11 A To the best of my knowledge at the time,

12 yes.

13 **Q All right. Did something change between**

14 **the time then and today that makes you believe that**

15 **it's not all accurate?**

16 A Well, as you can see, in line 4 on page 1,

17 I wasn't aware of my dates. I was just doing the

18 best to guesstimate when I actually met them.

19 Since then I've been able to find out that

20 through my Mar-a-Lago records that it was actually

21 the summer of 2000, not the summer of 1999.

22 **Q Oh, I'm sorry. Are you back on page 1?**

23 A On the first page.

24 **Q Okay.**

25 A Yes.

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1 **Q And you're talking about line 4?**

2 A Line 4.

3 **Q Paragraph 4 or line 4?**

4 A Oh, sorry. Number 4, the paragraph

5 number 4.

6 **Q Okay. And what part of paragraph 4 do you**

7 **now believe to be untrue?**

8 A In approximately --

9 MR. EDWARDS: Object to the form.

10 You can answer.

11 A In approximately 1999 when I was 15 years

12 old I met Ghislaine Maxwell.

13 **Q (BY MS. MENNINGER) Okay.**

14 A I now know that it was 2000, that I was 16

15 years old when I met Ghislaine Maxwell.

16 **Q So when you signed this document under**

17 **penalty of perjury stating that it was true, you no**

18 **longer believe that to be true, correct?**

19 A It was an honest mistake. We had no idea

20 how to pinpoint without any kind of records or dates

21 or anything like that. I was just going back

22 chronologically through time. And that's the best

23 time that I thought it was. And now I know the

24 facts, so it's good to know.

25 **Q So you now believe that a document you**

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1 **filed under oath is no longer true, correct?**

2 MR. EDWARDS: Object to the form.

3 A I wouldn't say that it wasn't true. I was

4 just unaware of the times and the dates.

5 **Q (BY MS. MENNINGER) Again, is there more**

6 **than one truth, Ms. Roberts?**

7 A No, there's no more than one truth.

8 **Q All right. So a document in which you**

9 **swore that you were 15 years old when you met**

10 **Ms. Ghislaine Maxwell is an untrue statement,**

11 **correct?**

12 MR. EDWARDS: Object to the form.

13 A It's not that it's an untrue statement.

14 It was a mistake. So it wasn't intentionally trying

15 to say something that wasn't true. It was to my best

16 knowledge that I thought it was 1999. And when I got

17 my records from Mar-a-Lago I was able to find out

18 that it was 2000. And this was entered before I

19 found out the actual dates that I did work at

20 Mar-a-Lago.

21 **Q (BY MS. MENNINGER) Okay. So a document**

22 **that you filed under oath --**

23 A Um-hum.

24 **Q -- is now, you believe to be untrue,**

25 **correct?**

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1 MR. EDWARDS: Objection. Asked and

2 answered.

3 **Q (BY MS. MENNINGER) You may answer.**

4 MR. EDWARDS: Answer again.

5 A Again, I wouldn't say it's untrue. Untrue

6 would mean that I would have lied. And I didn't lie.

7 This was my best knowledge at the time. And I did my

8 very best to try to pinpoint time periods going back

9 such a long time ago.

10 It wasn't until I found the facts that I

11 worked at Mar-a-Lago in 2000 that I was able to

12 figure that out.

13 **Q (BY MS. MENNINGER) And approximately when**

14 **did you learn those facts about the dates you worked**

15 **at Mar-a-Lago?**

16 A I would say it was mid-2015.

17 **Q Mid-2015 is the first time you became**

18 **aware of the dates --**

19 A I don't know the exact --

20 **Q If you could just let me finish.**

21 A I'm sorry.

22 **Q That's all right. Approximately mid-2015**

23 **when you learned the true dates that you had worked**

24 **at Mar-a-Lago?**

25 A That's correct. Sorry.

1 **Q And based on the fact that you learned the**
 2 **fact you had worked at Mar-a-Lago in 2000 -- you**
 3 **became aware in mid-2015 --**
 4 A Um-hum.
 5 **Q -- that you had met Ms. Maxwell in 2000,**
 6 **correct?**
 7 A That's --
 8 MR. EDWARDS: Object to the form.
 9 A That's correct.
 10 **Q (BY MS. MENNINGER) All right. And you**
 11 **became aware in mid-2015 that you were not 15 years**
 12 **old when you met Ghislaine Maxwell, correct?**
 13 MR. EDWARDS: Object to the form.
 14 A That's correct.
 15 **Q (BY MS. MENNINGER) Okay. And who**
 16 **provided you those Mar-a-Lago records in**
 17 **approximately mid-2015?**
 18 MR. EDWARDS: I'm going to object.
 19 And to the extent that this invades the
 20 attorney-client privilege, if it was your attorneys
 21 that you spoke to and learned this information or
 22 received this information from, then you're
 23 instructed not to answer.
 24 A I cannot answer that question.
 25 **Q (BY MS. MENNINGER) Did you yourself look**

1 **Q (BY MS. MENNINGER) I'm going to show you**
 2 **an exhibit filed on, I believe on or about**
 3 **February 6th of 2015. Defendant's Exhibit 4.**
 4 **(Exhibit 4 marked.)**
 5 MR. EDWARDS: Thank you.
 6 **Q (BY MS. MENNINGER) And drawing your**
 7 **attention to the heading line that says, Entered on**
 8 **the docket February 6th, 2015.**
 9 **Do you see that?**
 10 A Yes.
 11 **Q All right. And Declaration of Jane Doe 3,**
 12 **do you see that on the first page?**
 13 A Yes.
 14 **Q And it's in the CVRA case, correct, Jane**
 15 **Doe 1 and Jane Doe 2 versus United States of America?**
 16 A Yes.
 17 **Q All right. And do you recognize this**
 18 **document?**
 19 A Yes.
 20 **Q And what do you understand this document**
 21 **to be?**
 22 A I believe it's more reason to why I should
 23 have been added to the CVRA case.
 24 MR. EDWARDS: Objection to the relevance,
 25 Counsel.

1 **at records in the middle of 2015 regardless of who**
 2 **showed them to you?**
 3 MR. EDWARDS: Objection. And to the
 4 extent that they were showed to you or shared by any
 5 of your lawyers, you're instructed not to answer the
 6 question. It invades the attorney-client privilege.
 7 **Q (BY MS. MENNINGER) Did you look at**
 8 **Mar-a-Lago records in the middle of 2015 yourself?**
 9 MR. EDWARDS: She's not answering the
 10 question.
 11 MS. MENNINGER: On what grounds is she not
 12 answering the question?
 13 MR. EDWARDS: I just told you it invades
 14 the attorney-client privilege. If she learned --
 15 I will instruct her if she learned by some
 16 other way than her attorneys sharing the information
 17 with her, then she can answer the question.
 18 **Q (BY MS. MENNINGER) I'm asking you not to**
 19 **tell me whether your attorneys showed you the record.**
 20 **I'm asking you not to tell me the source of the**
 21 **record.**
 22 **I'm asking you if you personally in the**
 23 **middle of 2015 looked at Mar-a-Lago records?**
 24 MR. EDWARDS: Same objection.
 25 Same instruction.

1 **Q (BY MS. MENNINGER) Okay. And again, if**
 2 **you look to the last page of the document,**
 3 **paragraph 67 --**
 4 A The last page?
 5 **Q Yes, the very last.**
 6 A 67, yes.
 7 **Q All right. It says in paragraph 67: I**
 8 **declare under penalty of perjury that the foregoing**
 9 **is true and correct, right?**
 10 A Yes.
 11 **Q And it was executed on or about the**
 12 **5th day of February, 2015, correct?**
 13 A It's a bit smudged, but it kind of looks
 14 like a 5.
 15 **Q All right. And then there's a signature**
 16 **block that's redacted that says Jane Doe 3, correct?**
 17 A Correct.
 18 **Q Do you believe that you signed this**
 19 **document and it was later covered up by that block?**
 20 A Yes.
 21 **Q All right. And again, is there anything**
 22 **in this document that you believe today to not be**
 23 **true?**
 24 MR. EDWARDS: I just ask that you read
 25 through the entire document and answer the question.

1 **Q (BY MS. MENNINGER) Have you seen this**
 2 **document before, Ms. Giuffre?**
 3 A I'm sure I have, but it's always good to
 4 refresh your memory just looking over something.
 5 **Q All right.**
 6 **(Pause.)**
 7 A Thank you for giving me time to read that
 8 over.
 9 **Q Certainly. So have you had a chance to**
 10 **read it now?**
 11 A Yes.
 12 **Q All right. And what parts of this**
 13 **document sworn by you under penalty of perjury are**
 14 **not true?**
 15 A Again, the only thing that I see is the
 16 mistake that I made, I first met Epstein when I was
 17 15 years old.
 18 **Q Okay. And that's in paragraph 5?**
 19 A That's in paragraph 5 on the first page.
 20 **Q All right. And everything else you**
 21 **believe to be true?**
 22 A Yes.
 23 **Q Okay. If I could now turn to what I'll**
 24 **mark as Defendant's Exhibit 5.**
 25 **(Exhibit 5 marked.)**

1 THE DEPONENT: Thank you.
 2 MR. EDWARDS: Thank you.
 3 MS. MENNINGER: I think I have one more.
 4 MS. McCAWLEY: It's okay if you don't.
 5 MS. MENNINGER: I don't think I have all
 6 of them.
 7 **Q (BY MS. MENNINGER) All right. Do you**
 8 **recognize Defendant's Exhibit 5?**
 9 A Yes.
 10 **Q What is the title of that document?**
 11 A Declaration of Virginia Giuffre.
 12 **Q And that's you, correct?**
 13 A Yes.
 14 **Q And do you recognize which case this**
 15 **declaration was filed in?**
 16 A Yes. Bradley Edwards and Paul Cassell,
 17 Plaintiff versus [REDACTED].
 18 **Q All right. And who do you understand**
 19 **Mr. Edwards and Mr. Cassell to be?**
 20 A Mr. Edwards is my lawyer sitting next to
 21 me.
 22 **Q All right.**
 23 A And Mr. Cassell is another one of my
 24 lawyers.
 25 **Q All right. And they are in a lawsuit**

1 **against [REDACTED]; is that your understanding?**
 2 **It's your understanding. You don't have**
 3 **to look at your lawyer if you don't understand. You**
 4 **don't have to --**
 5 A No, I just don't know if I'm allowed --
 6 **Q That's all right.**
 7 A -- to say certain things about that. But,
 8 yes, I believe they were in a lawsuit.
 9 **Q Okay. And that's against [REDACTED],**
 10 **right?**
 11 A Correct.
 12 MR. EDWARDS: Object to the form. I
 13 object to the relevance of the document.
 14 **Q (BY MS. MENNINGER) All right.**
 15 **Ms. Giuffre, again, if you could turn to the last**
 16 **page of this document. And do you see a signature on**
 17 **that page?**
 18 A I do.
 19 **Q Whose signature is that?**
 20 A That is mine.
 21 **Q And approximately when did you sign that**
 22 **document?**
 23 A Executed this 20th day of November, 2015.
 24 **Q All right. So you signed that on**
 25 **November 20th, 2015, correct?**

1 A Correct.
 2 **Q All right. And that was under penalty of**
 3 **perjury, correct?**
 4 A Correct.
 5 **Q All right. If I could now turn to what**
 6 **we'll mark as Defendant's Exhibit 6.**
 7 **(Exhibit 6 marked.)**
 8 MR. EDWARDS: Thank you.
 9 MS. McCAWLEY: Thanks.
 10 **Q (BY MS. MENNINGER) Do you recognize this**
 11 **document, Ms. Giuffre?**
 12 A I do.
 13 **Q All right. What do you believe this**
 14 **document to be?**
 15 A I believe this is when I spoke to the FBI.
 16 **Q Okay. And do you remember about when you**
 17 **spoke to the FBI?**
 18 A It says, Date of entry July 5th, 2013.
 19 **Q Do you believe that you spoke to the FBI**
 20 **in 2013?**
 21 A I thought it was 2011 when I talked to
 22 them.
 23 **Q Okay. I'm going to direct your attention**
 24 **to the bottom of that page.**
 25 A Yes.

1 **Q The first page. Do you see that?**
 2 A Yes.
 3 **Q The last few lines there have another**
 4 **date.**
 5 A Oh, yes, investigation of, yes.
 6 **Q All right.**
 7 A So that makes sense, okay.
 8 **Q Okay. What do you understand that to be?**
 9 **And if it refreshes your recollection about when you**
 10 **spoke to the FBI, just let us know.**
 11 A Yeah, March 17th, 2011 sounds more right
 12 than 2013.
 13 **Q Okay. And where did you speak to them?**
 14 A I believe this was in the office of the
 15 consulate, American Consulate, in Sydney.
 16 **Q Sydney, Australia?**
 17 A Sydney, Australia.
 18 **Q Okay. And you were there in person with**
 19 **these FBI agents?**
 20 A Correct.
 21 **Q And were they taking notes when they spoke**
 22 **to you?**
 23 A Yes.
 24 **Q Were they recording the interview, to your**
 25 **knowledge?**

1 A I believe they were.
 2 **Q Okay. Have you had a chance to review**
 3 **this report?**
 4 **And I will make note for the record that**
 5 **there are obviously many places that are blacked**
 6 **out --**
 7 A Yeah.
 8 **Q -- or whited out. Is that fair?**
 9 A Yes.
 10 **Q All right. Have you had a chance to**
 11 **review this one with whited-out portions of it before**
 12 **today?**
 13 A Yes.
 14 **Q All right. And you understood when you**
 15 **were speaking to the FBI that they were federal**
 16 **agents, correct?**
 17 A Yes.
 18 **Q And that you were supposed to tell them**
 19 **the truth, correct?**
 20 A Absolutely.
 21 **Q And do you believe that you did, in fact,**
 22 **tell them the truth?**
 23 A To the best of my knowledge. Again, when
 24 it comes to dates and times, I was obviously off.
 25 But everything else is absolutely 100 percent true.

1 **Q Okay. And have you reviewed any -- have**
 2 **you at any time reviewed this document without those**
 3 **portions whited out?**
 4 A I don't believe I've seen this document
 5 without the portions.
 6 **Q Okay. So you don't know, for example,**
 7 **what's behind those, other than what you recall --**
 8 A No.
 9 **Q -- having told the FBI at the time,**
 10 **correct?**
 11 A That's correct.
 12 **Q Okay. I'm going to show you a new**
 13 **document.**
 14 A Okay.
 15 **Q You can just put that to the side.**
 16 **Defendant's Exhibit 7.**
 17 **(Exhibit 7 marked.)**
 18 **Q (BY MS. MENNINGER) All right.**
 19 MR. EDWARDS: Thanks.
 20 **Q (BY MS. MENNINGER) And do you recognize**
 21 **this document?**
 22 A Yes.
 23 **Q And what do you understand it to be?**
 24 A This was a phone conversation that I had
 25 between Jack Scarola and Brad Edwards.

1 **Q Okay. And do you see a date reflected on**
 2 **the front page?**
 3 A April 7, 2011.
 4 **Q Is that when you had that phone**
 5 **conversation with them?**
 6 A If it's dated like that, it must be, yes.
 7 **Q Well, I just need you to say from your**
 8 **memory, does that sound about right in terms of what**
 9 **you recall having been the phone conversation?**
 10 A I'm sure it's correct.
 11 **Q Okay.**
 12 A I don't have a good calendar in my brain.
 13 So, yes, I'm sure that that's the correct date.
 14 **Q Did you understand it was being recorded,**
 15 **correct?**
 16 A Yes.
 17 **Q Okay. Have you listened to the recording**
 18 **of that phone call?**
 19 A I don't believe I listened to the
 20 recording, but I have seen the document.
 21 **Q All right. And again, you were speaking**
 22 **the truth at the time you were speaking to them as**
 23 **lawyers and officers of the court, correct?**
 24 A Yes. And again, to the best of my
 25 knowledge when it comes to dates.

1 **Q Okay. And then the last -- the last**
 2 **document, I hope, is --**
 3 MS. MENNINGER: The big one.
 4 (Exhibit 8 marked.)
 5 **Q (BY MS. MENNINGER) All right. Do you**
 6 **recognize -- I'm going to -- I'm sorry, if I didn't**
 7 **say it already. This is Defendant's Exhibit 8.**
 8 **Do you recognize this document?**
 9 A Yes, I do.
 10 **Q And what is this document?**
 11 A This is a manuscript that I was writing, I
 12 believe, back in 2011 regarding some of my life
 13 story. And just to make it known, this is a based on
 14 true events. But I wouldn't say fictional, but just
 15 based on true events.
 16 Not everything in it is -- not everything
 17 is in there and not everything is, you know, correct.
 18 So there's a few mistakes in there.
 19 **Q Okay. Off the top of your head, do you**
 20 **recall any mistakes that are in there now without**
 21 **reading the 140-page document?**
 22 MR. EDWARDS: We're going to be here a
 23 long time.
 24 A Yeah, we could be here a very long time.
 25 I mean, I'd like to say a majority of it is correct.

1 Some names have been changed in order to protect
 2 other people.
 3 **Q (BY MS. MENNINGER) Protect their privacy?**
 4 A Protect their privacy, yeah, I would say,
 5 just not getting them involved in, if this were to
 6 ever go public.
 7 **Q Well, again, without rereading the whole**
 8 **manuscript --**
 9 A Reading it, yeah. I'm trying to see if I
 10 can -- see something in here.
 11 **Q Let me narrow my question and maybe that**
 12 **will help.**
 13 A Yes.
 14 **Q Is there anything -- well, first of all,**
 15 **did you author that entire manuscript?**
 16 A Yes, I did.
 17 **Q Did anyone else author part of that**
 18 **manuscript?**
 19 A Do you mean did anyone else write this
 20 with me?
 21 **Q Right.**
 22 A No.
 23 **Q That's all your writing?**
 24 A This is my writing.
 25 **Q Okay. To the best of your recollection,**

1 **as you sit here right now, is there anything in that**
 2 **manuscript about Ghislaine Maxwell that is untrue?**
 3 A I don't believe so. Like I said, there is
 4 a lot of stuff that I actually have left out of here.
 5 **Q Um-hum.**
 6 A So there is a lot more information I could
 7 put in there. But as far as Ghislaine Maxwell goes,
 8 I would like to say that there is 99.9 percent of it
 9 would be to the correct knowledge.
 10 **Q All right. Is there anything that you --**
 11 **and I understand you're doing this from memory. Is**
 12 **there anything that you recall, as you're sitting**
 13 **here today, about Ghislaine Maxwell that is contained**
 14 **in that manuscript, that is not true?**
 15 A You know, I haven't read this in a very
 16 long time. I don't believe that there's anything in
 17 here about Ghislaine Maxwell that is not true.
 18 MR. EDWARDS: I'd just ask, Counsel, if
 19 you have anything specific to show her about
 20 Ghislaine Maxwell --
 21 MS. MENNINGER: I'll ask questions.
 22 MR. EDWARDS: -- I'll have her look at it.
 23 MS. MENNINGER: I'll ask questions.
 24 MR. EDWARDS: I know, but I want the
 25 record clear that if she hasn't read it in a long

1 time, she --
 2 MS. MENNINGER: She made the record very
 3 clear. Thank you. She doesn't need you to make a
 4 record.
 5 MR. EDWARDS: I'm not making records, but
 6 you're making this last longer. There's no need for
 7 this. This doesn't have to be an unpleasant process.
 8 I want her to help you.
 9 MS. MENNINGER: I don't find it
 10 unpleasant. I'm sorry if you do.
 11 MR. EDWARDS: Okay. Well, then, I object
 12 to that last series of questions to the extent that
 13 she was unable to look at what you wanted her to look
 14 at.
 15 **Q (BY MS. MENNINGER) I would like to next**
 16 **turn to a document filed on March 16th of this year.**
 17 **Or actually, let me rephrase that. A document dated**
 18 **March 16th of this year, which we will mark as**
 19 **Defendant's Exhibit 9.**
 20 **(Exhibit 9 marked.)**
 21 **Q (BY MS. MENNINGER) Do you recognize this**
 22 **document, Ms. Giuffre?**
 23 A Yes, I do.
 24 **Q All right. And what is your understanding**
 25 **of what this document represents?**

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1 A Based upon the title, it is Plaintiff's
 2 Response and Objections to Defendant's First Set of
 3 Discovery Requests to Plaintiff.
 4 **Q And are you the plaintiff?**
 5 A I am the plaintiff, yes.
 6 **Q All right. So it's your response to**
 7 **Ms. Maxwell's discovery request, correct?**
 8 A Correct.
 9 **Q All right. And if you look at the last**
 10 **page -- or, I'm sorry, it would be the second to last**
 11 **page -- you might see signatures of your attorney,**
 12 **correct?**
 13 A I see printed names.
 14 **Q Printed. Electronic signature --**
 15 A Okay.
 16 **Q -- will have a little S in front of it.**
 17 A All right.
 18 **Q Do you see that?**
 19 A I can see the, yeah the printed names. So
 20 if it's electronic signature, then yes.
 21 **Q All right. And the date on that is**
 22 **March 16th of 2016?**
 23 A Correct.
 24 **Q All right. And so without revealing the**
 25 **content of your conversations, you assisted in**

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1 **preparing responses to discovery requests, correct?**
 2 A Yes.
 3 **Q All right. I'm going to show you a**
 4 **subsequent one marked Defendant's Exhibit 10 and**
 5 **dated March 22nd.**
 6 **(Exhibit 10 marked.)**
 7 **Q (BY MS. MENNINGER) If you can take a look**
 8 **at that.**
 9 A Thank you.
 10 **Q And while we're at it, I'm going to give**
 11 **you Defendant's Exhibit 11 so you can look at them**
 12 **together.**
 13 **(Exhibit 11 marked.)**
 14 **Q (BY MS. MENNINGER) All right.**
 15 A Thank you.
 16 **Q All right. So looking at Defendant's**
 17 **Exhibit 10, do you recognize that document?**
 18 A Plaintiff's Supplemental Response and
 19 Objections to Defendant's First Set of Discovery
 20 Requests to Plaintiff.
 21 I've seen a lot of documents, and they all
 22 look the same. But I'm sure I've seen it.
 23 **Q All right. And looking, again, at the**
 24 **last page -- or I'm sorry, this time it will be the**
 25 **third to last page.**

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1 **Do you see your attorney's signature and**
 2 **the date, March 22nd, 2016, correct?**
 3 A I do.
 4 **Q All right. And then looking at**
 5 **Defendant's Exhibit 11, that's your declaration,**
 6 **correct?**
 7 A Yes, it is.
 8 **Q And declaring under penalty of perjury as**
 9 **of March 22nd, 2016 that the supplemental response**
 10 **and objections are true and correct, right?**
 11 A Correct.
 12 **Q And you -- that's your signature?**
 13 A That is mine.
 14 **Q And you are swearing under penalty of**
 15 **perjury that Defendant's Exhibit 10 is true and**
 16 **correct?**
 17 A Yes.
 18 **Q As of March 22nd, 2016, right?**
 19 A Yes.
 20 **Q All right. And then one more on that.**
 21 **Defendant's Exhibit 12.**
 22 **(Exhibit 12 marked.)**
 23 **Q (BY MS. MENNINGER) And do you recognize**
 24 **this document?**
 25 A Yes.

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1 **Q Okay. And what is this document?**
 2 A Plaintiff's Second Amended Supplemental
 3 Response and Objections to Defendant's First Set of
 4 Discovery Requests to Plaintiff.
 5 **Q All right. And again, turning to the very**
 6 **rear section, I think you'll see your attorney's**
 7 **signatures again and the date of April 29th, 2016?**
 8 A I do see that.
 9 **Q All right. And again, you authorized this**
 10 **document to be filed, correct?**
 11 A Correct.
 12 **Q And the statements contained therein are**
 13 **true, to the best of your knowledge, correct?**
 14 A Correct.
 15 **Q And that's -- April 29th is just a few**
 16 **days ago, correct?**
 17 A Yes.
 18 **Q All right. Did you review this April 29th**
 19 **document before it was filed or served?**
 20 A Like I said, I've seen a lot of documents
 21 and they all look alike, but I'm sure I've seen this
 22 one.
 23 **Q Okay. And if it's something that was**
 24 **served last Friday, does that refresh your**
 25 **recollection that you reviewed it before it was**

1 **served on April 29th, 2016?**
 2 A I believe I have seen this.
 3 **Q And you were here in the U.S. last Friday?**
 4 A Yes.
 5 **Q So you saw it in person, correct?**
 6 A Yes, I was looking at a lot of documents
 7 on Friday.
 8 **Q Okay.**
 9 A I believe this could definitely be one I
 10 looked at.
 11 **Q All right. If I could direct your**
 12 **attention to -- let me see, in that document --**
 13 MR. EDWARDS: Exhibit 12?
 14 MS. MENNINGER: Um-hum, Defendant's
 15 Exhibit 12.
 16 **Q (BY MS. MENNINGER) -- to page -- sorry.**
 17 **You're not the only one who's seen a lot of**
 18 **documents.**
 19 **Well, without asking you to look at a**
 20 **page, can you tell me what your -- between 1996**
 21 **and -- well, in 1996 to 2002, what was the first job**
 22 **that you held?**
 23 A I believe the first job that I held was in
 24 the year 2000, and that was at Mar-a-Lago.
 25 **Q Okay. And is that the first job you held**

1 **Q Written from Taco Bell?**
 2 A You know, I don't know, sorry. I just --
 3 I remember he asked me to come in and help him out,
 4 and that's -- I didn't really consider myself an
 5 employee there, but --
 6 **Q Just wearing the shirt and getting a**
 7 **paycheck didn't cause you to think you were an**
 8 **employee?**
 9 A Well --
 10 MR. EDWARDS: Object to the form.
 11 Mischaracterizes her testimony.
 12 A Yeah, I know. I mean, it was my
 13 boyfriend. I was helping him out. So that's the way
 14 I looked at it.
 15 **Q (BY MS. MENNINGER) Is there any other**
 16 **place that you wore a uniform and got a check from in**
 17 **the years from '96 to 2000?**
 18 A I did work at Publix as a bag girl, but
 19 that was only for a couple weeks, I think.
 20 **Q Which Publix was that?**
 21 A I believe it was in Loxahatchee.
 22 **Q Okay. Do you remember the street?**
 23 A No.
 24 **Q All right. Anywhere else you wore a**
 25 **uniform and got a paycheck?**

1 **as a teenager or at any point in time, that you**
 2 **recall?**
 3 A Yes, that I recall.
 4 **Q All right. Did you ever work at Taco**
 5 **Bell?**
 6 A My ex-boyfriend used to work there and I
 7 would help him out. I was never really -- I don't
 8 think I was employed there. He was my boyfriend so I
 9 stayed there with him all the time.
 10 **Q What was his name?**
 11 A I called him [REDACTED] but I think his real
 12 name was [REDACTED]
 13 **Q Okay. And so he was employed there, but**
 14 **you were not employed there?**
 15 A I used to go there and help him out.
 16 **Q Did you have a uniform?**
 17 A I would have to wear a shirt when I was
 18 there, yes. He was the manager, so --
 19 **Q Oh, a Taco Bell shirt?**
 20 A Yes.
 21 **Q Okay. And did you get a paycheck from**
 22 **them?**
 23 A I believe [REDACTED] paid me.
 24 **Q How did he pay you?**
 25 A With a check.

1 A I volunteered at a bird aviary.
 2 **Q What was the name of that?**
 3 A I don't know the name of it. But it
 4 was -- I'm an animal lover. So --
 5 **Q Okay.**
 6 A -- it's something I enjoyed doing.
 7 **Q Okay. Did you get a check from them?**
 8 A I volunteered. I think they eventually
 9 put me on some kind of payroll. I don't think it was
 10 much, though.
 11 **Q Okay. So what year were you in helping**
 12 **out in a Taco Bell wearing the uniform and getting a**
 13 **check?**
 14 A I have no idea when it comes to years.
 15 **Q Was it before or after Mar-a-Lago?**
 16 A Before Mar-a-Lago.
 17 **Q Okay. And how --**
 18 A Mar-a-Lago was my first real job so --
 19 **Q What's that?**
 20 A Mar-a-Lago was like my first real job.
 21 **Q What do you mean by real job?**
 22 A Like, you know, fully employed, sit down
 23 for an interview and, you know.
 24 **Q Okay. So Taco Bell, was Taco Bell the**
 25 **first place you got a paycheck from?**

1 MR. EDWARDS: Object to the form.
 2 A Uhm, I don't know, to be honest.
 3 **Q (BY MS. MENNINGER) And in what order did**
 4 **Taco Bell, Publix and Mar-a-Lago go, and the aviary,**
 5 **sorry?**
 6 A Oh, I would have to guess. Do you want me
 7 to guess?
 8 **Q Sure.**
 9 A Um, I would say Publix. And then, I think
 10 that's when I helped my boyfriend out at Taco Bell
 11 and then I think the aviary.
 12 **Q And where was the Taco Bell?**
 13 A I was living in Fort Lauderdale -- I think it
 14 was Fort Lauderdale. Don't quote me on that, but
 15 somewhere in Florida, Broward County, something like
 16 that.
 17 **Q And who were you living with at that time?**
 18 A Michael. His name is James, but Michael.
 19 **Q So you were living with Michael when you**
 20 **worked at the Taco Bell, right?**
 21 A Yes, I was living with him.
 22 **Q And you worked with Michael when you**
 23 **worked at the Publix, correct?**
 24 A No.
 25 **Q Okay. So Publix came after Taco Bell or**

1 **before?**
 2 A I think it came -- like I said, don't
 3 quote me on it, but I think Publix came before it.
 4 **Q And who were you living with when you**
 5 **worked at Publix?**
 6 A My mom and my dad.
 7 **Q And who were you living with when you**
 8 **worked at the aviary?**
 9 A My mom and my dad.
 10 **Q Anywhere else that you got a paycheck from**
 11 **before 2000?**
 12 A No, not that I can think of.
 13 **Q Okay. Anywhere else you wore a uniform?**
 14 A Besides Mar-a-Lago and -- yeah, that's it.
 15 **Q Okay. And so how long was it between**
 16 **working at any of those three places and the time**
 17 **that you worked at Mar-a-Lago?**
 18 A I have no idea. I'm sorry. Um --
 19 **Q Years? Months?**
 20 A Oh, we're going to go back
 21 chronologically. I was trying to get my GED and I --
 22 there was a summer break. And that's when I started
 23 working for Mar-a-Lago. So that Mar-a-Lago we know
 24 now is in the year 2000. So I would have to say a
 25 month.

1 **Q Months. And what was the job you believe**
 2 **you had immediately prior to Mar-a-Lago?**
 3 A If I were correct, it would be the aviary
 4 that I volunteered at.
 5 **Q Okay. And you believe you were living**
 6 **with your parents at the time you worked at the**
 7 **aviary?**
 8 A Yes.
 9 **Q Okay. And not living with [REDACTED]**
 10 A [REDACTED] might have been living with me and
 11 my parents.
 12 **Q Okay. So you recall [REDACTED] was living**
 13 **with you and your parents at the time you worked at**
 14 **the aviary?**
 15 A Yes.
 16 MS. McCAWLEY: Objection.
 17 Mischaracterizes testimony.
 18 **Q (BY MS. MENNINGER) And was [REDACTED] living**
 19 **with you and your parents at the time you started at**
 20 **Mar-a-Lago?**
 21 A Yes.
 22 **Q And what address was [REDACTED] living with**
 23 **you and your parents at the time you started at**
 24 **Mar-a-Lago?**
 25 A My parents' address?

1 **Q Whatever address you were living at, at**
 2 **the time you started at Mar-a-Lago.**
 3 A [REDACTED], Loxahatchee, Florida
 4 33470.
 5 **Q How is it that you came to work at**
 6 **Mar-a-Lago?**
 7 A My dad is a maintenance manager or
 8 supervisor, I don't know what you call it. But he
 9 worked in the maintenance department, mostly on
 10 tennis courts, working on the air conditioning,
 11 helping set up for functions. And he got me a summer
 12 job there.
 13 **Q Okay. And you said you were on a break?**
 14 A Yes.
 15 **Q What were you on a break from?**
 16 A I think like -- this is going back so long
 17 now, but I was attempting to get my GED. And it,
 18 summer came, so school stops during the summertime
 19 here in America, and I got a summer job.
 20 **Q All right. And where were you in school?**
 21 A I don't actually know the name of the
 22 place. It's -- yeah, I know.
 23 **Q A GED place?**
 24 A Yeah, it was, like, I was previously in
 25 Royal Palm Beach High School, but, I mean, because of

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1 a lot of the circumstances that I had been subjected
 2 to, I decided I wanted to get my GED.
 3 **Q Okay. So you were going to an actual**
 4 **school to get your GED, that's what you're saying?**
 5 A Yes.
 6 **Q And that school, whatever it was, where**
 7 **you were getting your GED was not Palm Beach High**
 8 **School, right?**
 9 A No.
 10 **Q And it -- whatever the school was where**
 11 **you were getting your GED took a summer break?**
 12 A I believe so, yes.
 13 **Q And that was in 2000?**
 14 A Now that we know the right dates, yes.
 15 **Q And that's when your dad helped you get a**
 16 **quote-unquote summer job?**
 17 A Yes.
 18 **Q All right. And that summer job was**
 19 **Mar-a-Lago?**
 20 A Yes.
 21 **Q Okay. Now tell me how you sort of came**
 22 **into Mar-a-Lago for the first time? He asked you to**
 23 **come? They called you? What happened?**
 24 A My dad was very liked there. So I think
 25 he talked to the people who were in HR. And then

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1 they said for me to come in for an interview.
 2 **Q Um-hum.**
 3 A To be interviewed for a locker room
 4 assistant.
 5 **Q Um-hum.**
 6 A They liked me. I had to go through a
 7 series of drug tests, polygraph tests. I mean, it
 8 was a very extensive regime to get a job there.
 9 **Q Yeah.**
 10 A And when all those came back good, I
 11 started the job.
 12 **Q So how long do you think it took for you**
 13 **to go through that extensive series of drug tests and**
 14 **polygraph tests and --**
 15 A I did them both in the same day.
 16 **Q Okay. When was the interview? Was it on**
 17 **the same day or a different day?**
 18 A I believe it was like a few days
 19 beforehand.
 20 **Q Okay. And do you remember who you**
 21 **interviewed with?**
 22 A No.
 23 **Q Do you remember the title of the job for**
 24 **which you were interviewing?**
 25 A Locker room attendant.

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1 **Q Locker room attendant was the name?**
 2 A Of the position?
 3 **Q Yes.**
 4 A Yes.
 5 **Q And did they give you any training?**
 6 A No.
 7 **Q Did they show you how to work the lockers?**
 8 A Well, I mean, there was a girl who already
 9 worked there at the front desk. I think she helped
 10 make appointments and greeted people, and then she
 11 just told me my duties in the locker room were to,
 12 you know, make tea. I had never made tea before, so
 13 that was -- that was fun. Learn how to make tea.
 14 Clean up after the ladies who had been in the locker
 15 room. Make sure the bathrooms were kept nice and
 16 tidy. You fold the toilet paper into a little
 17 triangle every time anyone went to the toilet. Clean
 18 up the sink area. It was a very crazy job.
 19 **Q Do you remember the names of any of your**
 20 **coworkers who you worked with at Mar-a-Lago?**
 21 A I believe the head of the spa area was
 22 Adriana or Adrienne. I can't remember exactly.
 23 **Q Okay.**
 24 A And the girl who trained me, I have a very
 25 clear picture of her face, but I can't remember her

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1 name.
 2 **Q All right. What did she look like?**
 3 A She had blonde hair, probably to her
 4 shoulders, and it was curly.
 5 **Q And how old was she?**
 6 A I'd say in her 20s.
 7 **Q All right. Did they check your**
 8 **identification when you went in for your job**
 9 **interview or your --**
 10 A It was very extensive. I'm sure they
 11 would have had to check and make sure I was who I
 12 was.
 13 **Q And so you had a driver's license, right?**
 14 A I believe so.
 15 **Q All right. And, let's see. Did you move**
 16 **to a different position while you were there or did**
 17 **you always stay as a locker room --**
 18 A I wasn't there very long. So I just --
 19 **Q Just one second. Did you always stay as a**
 20 **locker room attendant?**
 21 A Yes.
 22 **Q Okay. I just need to finish my question**
 23 **for the court reporter.**
 24 A I know, I'm sorry. I have a tendency of
 25 jumping in.

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1 **Q Okay. If I can direct your attention back**
 2 **to Defendant's Exhibit 12 at page 15. And under the**
 3 **heading Response to Interrogatory Number 9, do you**
 4 **see that where it says --**
 5 A Yes.
 6 **Q -- Ms. Joffrey (pronouncing) -- Giuffre,**
 7 **excuse me, responds as follows?**
 8 A Yes.
 9 **Q Okay. It says you worked as a locker room**
 10 **attendant for the spa area, correct?**
 11 A Yes.
 12 **Q And it says records produced in this case**
 13 **identify the date of employment as 2000, correct?**
 14 A Yes.
 15 **Q What records that were produced in this**
 16 **case cause you to believe that the employment began**
 17 **in 2000?**
 18 A Uhm, is this going back to another
 19 question that I'm not allowed to answer?
 20 **Q No.**
 21 A I have seen the documents, and I know that
 22 my employment now was in 2000.
 23 **Q What documents did you see that caused you**
 24 **to make that answer?**
 25 A The Mar-a-Lago employment documents.

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1 **Q Are they your Mar-a-Lago employment**
 2 **documents?**
 3 A Um --
 4 MR. EDWARDS: Object to the form.
 5 A My name is on there.
 6 **Q (BY MS. MENNINGER) Okay. Do you believe**
 7 **them to be your Mar-a-Lago employment documents?**
 8 A As far as I can tell.
 9 **Q Okay. So you were able to review your**
 10 **Mar-a-Lago employment documents --**
 11 MR. EDWARDS: Object to the form.
 12 **Q (BY MS. MENNINGER) -- and respond to the**
 13 **question, as it says right there that you respond,**
 14 **correct?**
 15 A Yes.
 16 **Q When did you review the documents that you**
 17 **reviewed to cause you to respond to that answer that**
 18 **way?**
 19 A I don't think I found out till sometime
 20 mid -- mid last year, I believe.
 21 **Q Okay.**
 22 A I'm really not too sure. You know, I'm
 23 sorry, dates and documents, there's too many to
 24 remember. But --
 25 **Q Okay. You do admit that you filed in many**

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1 **documents that you met Ghislaine Maxwell in '98 or**
 2 **'99, correct?**
 3 A Yes.
 4 **Q And you do admit that you told members of**
 5 **the media that you met Ghislaine Maxwell in '98 or**
 6 **'99, correct?**
 7 MR. EDWARDS: Form.
 8 A That was my closest approximation to what
 9 I could actually remember, so --
 10 **Q (BY MS. MENNINGER) You told the media**
 11 **that you met her in '98 or '99?**
 12 MR. EDWARDS: Form.
 13 A Again, yes, as close as I can remember.
 14 **Q (BY MS. MENNINGER) And the media**
 15 **published in the newspapers that you met Ghislaine**
 16 **Maxwell in '98 or '99, correct?**
 17 MR. EDWARDS: Form.
 18 A Yes, they did.
 19 **Q (BY MS. MENNINGER) And the news media**
 20 **published in the newspapers what you told them, which**
 21 **is that you were 15 when you met Ghislaine Maxwell,**
 22 **correct?**
 23 MR. EDWARDS: Form.
 24 A Which is what I truly thought at the time,
 25 yes.

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1 **Q (BY MS. MENNINGER) Okay. And it is not**
 2 **true that you were 15 when you met Ghislaine Maxwell,**
 3 **correct?**
 4 A It was a mistake that I made, yes.
 5 **Q So that the printing in the newspaper that**
 6 **you met Ghislaine Maxwell when she was -- when you**
 7 **were 15 is not a true statement of fact, correct?**
 8 A It is an incorrect statement as I have now
 9 found out, that my employment started in 2000.
 10 **Q All right. And to the best of your**
 11 **recollection, you found that out in the middle of**
 12 **2015, correct?**
 13 MS. McCAWLEY: Objection.
 14 A To the best of my recollection. I mean, I
 15 can't pinpoint an exact date I found out. But, yes.
 16 **Q (BY MS. MENNINGER) About a year ago?**
 17 MR. PAGLIUCA: Are we all participating in
 18 this deposition or just --
 19 MS. McCAWLEY: Same way you guys did.
 20 MR. PAGLIUCA: We did not.
 21 MS. MENNINGER: I did not.
 22 MS. McCAWLEY: You both objected.
 23 MS. MENNINGER: No.
 24 MR. PAGLIUCA: No, we didn't.
 25 MS. McCAWLEY: We can go back through the

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1 record.

2 MR. PAGLIUCA: We sure can.

3 So if we're all participating, maybe I'll

4 have a few questions at the end of this. I think we

5 should limit this to one lawyer. And your statement

6 about two lawyers participating in the last

7 deposition is wrong.

8 MS. McCAWLEY: Well, I recall that she got

9 a microphone because she said she was going to be

10 objecting. So --

11 MR. PAGLIUCA: I know. She put on a

12 microphone and didn't speak through the whole thing.

13 MS. McCAWLEY: Well, we can take a look

14 back at the record. You know, it's not a problem.

15 Brad can make the objections.

16 MR. PAGLIUCA: Okay. Let's take care of

17 it that way, then.

18 MR. EDWARDS: Can you tell me when you're

19 at a good stopping point?

20 MS. MENNINGER: I was about to say it's

21 been an hour.

22 MR. EDWARDS: Yeah.

23 MS. MENNINGER: So this would be a good

24 time to take a break.

25 MR. EDWARDS: Okay. Thanks.

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1 THE VIDEOGRAPHER: We're off the record at

2 10:12.

3 (Recess taken from 10:12 a.m. to

4 10:27 a.m.)

5 THE VIDEOGRAPHER: We're back on the

6 record at 10:27.

7 **Q (BY MS. MENNINGER) All right.**

8 **Ms. Giuffre, you testified that you first became**

9 **aware that you -- your employment at Mar-a-Lago began**

10 **in 2000, in mid-2015, correct?**

11 MR. EDWARDS: Object to the form.

12 Mischaracterizes her testimony.

13 A I don't know exactly when. It could be

14 towards the end of 2015. It could be towards the

15 beginning of 2016. I just know that I've learned

16 about it recently. I'm not too sure exactly what

17 date I did learn about it.

18 **Q (BY MS. MENNINGER) Okay. But to your**

19 **mind, it's been within the last 6 to 12 months; is**

20 **that fair?**

21 A I wouldn't say 12 months, no. I would

22 just say up until -- I don't know when I was shown

23 that, when I actually first saw it, but it wasn't a

24 year ago.

25 **Q Saw your employment records from**

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1 **Mar-a-Lago?**

2 A Correct.

3 **Q Okay. I'm going to show you an exhibit**

4 **marked as Defendant's Exhibit 13.**

5 **(Exhibit 13 marked.)**

6 **Q (BY MS. MENNINGER) Okay. All right,**

7 **Ms. Giuffre, do you recognize this document?**

8 A Yes, I do.

9 **Q What is this document?**

10 A This is a resume that I created myself.

11 **Q All right. And what address did you put**

12 **at the top of your resume?**

13 A [REDACTED]

14 [REDACTED]

15 **Q And when did you live at that address?**

16 A I believe from 2013 to 2014.

17 **Q Okay. And you said you created this**

18 **document, correct?**

19 A Yes.

20 **Q And did you send it out to any employers?**

21 A Do you have any attachments that this goes

22 with to say that I have? Because I'm not too sure.

23 I've created a lot of resumes.

24 **Q Okay. And hold on, I'll see if we do.**

25 MS. MENNINGER: All right. I'll mark this

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1 next as Defendant's Exhibit 14.

2 (Exhibit 14 marked.)

3 A Thank you.

4 **Q (BY MS. MENNINGER) All right. Do you**

5 **recognize this document?**

6 A Yes.

7 **Q What is this document?**

8 A This is me replying to ads for jobs.

9 **Q Okay. And you were communicating with --**

10 **by your e-mail, correct?**

11 A Yes.

12 **Q All right. And I apologize. This one**

13 **actually has the resume attached to an e-mail.**

14 A Um-hum.

15 **Q Do you see that, towards the back of the**

16 **document?**

17 A Yes, I do.

18 **Q Okay. So --**

19 A Sorry.

20 **Q To whom -- to whom -- with whom were you**

21 **communicating about a job at this time?**

22 A Well, on the very top, Phil or Gary, and

23 that was for a bartending position.

24 **Q Okay.**

25 A Um --

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1 **Q Was that something your brother had**
 2 **recommended or your father? I don't know who.**
 3 A You know, I just looked at that, that's
 4 kind of why I giggled. I don't know why my
 5 brother -- that's my brother. That's the way we talk
 6 to each other: Hi, stupid head. Good luck, smelly,
 7 XOXOXO, sissie.
 8 He's my little brother so you have to
 9 understand we kind of play around. But subject to my
 10 resume for hospitality, I'm not too sure why he would
 11 have gotten it, but apparently he did.
 12 **Q Okay. And you see that your resume was**
 13 **attached to an e-mail communication you had with your**
 14 **brother?**
 15 A Yes, I do.
 16 **Q Right. And that's also your brother was**
 17 **part of the e-mail chain with respect to an ad placed**
 18 **on craigslist for a position, correct?**
 19 A He was on -- let me just check the dates,
 20 then.
 21 **Q Sure.**
 22 A 1/20/2014, 1/21, so just within a day of
 23 each other, yes.
 24 **Q All right. And then the resume that's**
 25 **attached is the address you were living at in**

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1 **January --**
 2 A Yes.
 3 **Q -- of 2014, correct?**
 4 A Correct.
 5 **Q All right. So you believe you created the**
 6 **resume that's attached to Defendant's Exhibit 14,**
 7 **correct?**
 8 A Correct.
 9 **Q And you sent it out with respect to this**
 10 **employment you saw on craigslist, correct?**
 11 A Correct.
 12 **Q And you are the one who put into this**
 13 **document the contents of the resume, right?**
 14 A Yes.
 15 **Q All right.**
 16 MR. EDWARDS: We're talking about the
 17 resume that's attached to Exhibit 14, right?
 18 MS. MENNINGER: We are.
 19 MR. EDWARDS: Okay. Got it.
 20 MS. MENNINGER: Thank you for clarifying.
 21 MR. EDWARDS: Got it.
 22 MS. MENNINGER: Although, I don't know
 23 there are any differences with Defendant's
 24 Exhibit 13.
 25 **Q (BY MS. MENNINGER) But just to be safe,**

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1 **you believe the one attached to Defendant's**
 2 **Exhibit 14 is the one that you sent?**
 3 A There are differences, isn't there? Yes,
 4 there is.
 5 **Q Okay. What are the differences that you**
 6 **know?**
 7 A It starts -- I mean, let me see. The very
 8 top introduction is the same.
 9 **Q Um-hum.**
 10 A After the experience.
 11 **Q Um-hum.**
 12 A That changes. The dates change. And then
 13 underneath Employment Training Recruitment is Indigo
 14 Bar & Grill on Exhibit 14. On Exhibit 13 it's
 15 Mannway Logistics underneath Employment Training
 16 Recruitment.
 17 And then underneath Mannway Logistics on
 18 Exhibit 13 is Mar-a-Lago Resort and Spa. And on
 19 Exhibit 14 is Gemma Catering/Wedding Receptions. So
 20 there is quite a few differences.
 21 **Q Okay. Great. Do you have any idea when**
 22 **you sent out Defendant's Exhibit 13, or if you did,**
 23 **to an employer?**
 24 A Unless you have something that's attached
 25 to it, I can't be sure that I did.

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1 **Q Okay. Is the content in Defendant's**
 2 **Exhibit 14, that you believe you sent out to an**
 3 **employer, correct?**
 4 A Unfortunately, I have to tell you that
 5 they are not correct. Through my experience I was in
 6 the mind-set that I was unemployable. I had been
 7 abused for many years and I was told by a job agency
 8 that I need to show that I've consistently worked at
 9 various places and given experience. So it's not
 10 something that I'm proud of, but I have had to plump
 11 up my resumes to make it look as though I could be
 12 employed.
 13 **Q What do you mean by plump up your resume?**
 14 A Well, I couldn't -- I didn't feel that I
 15 could go to an employer and tell them that I had
 16 held, you know, one job in the last 10 to 12 years
 17 and before that I was trafficked for the purpose of
 18 sex. And that's definitely something you don't want
 19 to put down on your resume, which makes you quite
 20 highly unemployable.
 21 So I did add places in, such as Indigo Bar
 22 & Grill, Calmao Flamenco Bar & Restaurant.
 23 **Q Wait, wait. Which one?**
 24 A On Exhibit 14.
 25 **Q Um-hum.**

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1 A Underneath Experience, the dates are all
 2 incorrect, as well. It's just to show that I was
 3 consistently working, which I was not. And I needed
 4 a job to help my family. I've got a family of five.
 5 So like I said, it's not something proud that I had
 6 to do, but I felt it was the only way that I could
 7 actually get employed.

8 **Q You lied on your resume?**

9 A I made it look as though I had
 10 continuously worked throughout the years so that way
 11 an employer would see me as a potential candidate.

12 **Q Okay. Well, let's start with Employment**
Training and Recruitment, ET Australia.

13 **Did you work at that place of employment?**

14 A I did work there.

15 **Q What dates did you actually work there?**

16 A I know I finished working for -- we call
 17 it ET Australia, so if you don't mind me abbreviating
 18 it.

19 **Q However you want.**

20 A I know I finished there in January of 2006
 21 right before my son was born, my first son was born.
 22 And I believe I worked there for a year, I believe
 23 so. It might have been a little bit over a year, but
 24 just around a year.
 25

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1 **Q All right. So you worked at a place for**
2 about a year. And on your resume you typed that you
3 worked there for nine years, correct?

4 A Correct.

5 **Q And you did that, correct?**

6 A I did.

7 **Q Nobody else typed that for you?**

8 A No, I did it myself.

9 **Q All right. And the next employment you**
10 list here -- well, is your job description accurate?

11 A Yes, that is actually accurate.

12 **Q Okay. And everything in there is what you**
13 actually did?

14 A Yes, for ET Australia.

15 **Q Okay. Indigo Bar & Grill, did you type**
16 that in?

17 A I did type that in.

18 **Q And did you actually work at Indigo Bar &**
19 Grill?

20 A No, I did not.

21 **Q All right. So the dates that you put on**
22 your resume are not true, correct?

23 A That's correct.

24 **Q The title of your job at that place was**
25 not correct; you didn't work there, right?

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1 A I never worked there.

2 **Q The description that you typed out about**
3 the things that you did at that Indigo Bar & Grill is
4 made up, correct?

5 A Well, it's -- it's generally what you
 6 would do if you were a server or a waitress. But,
 7 like I said, I did not work at Indigo Bar & Grill.

8 **Q So when you represented to an employer**
9 that you were applying for a job that you had done
10 these things, you had not actually done these things
11 at Indigo Bar & Grill, correct?

12 A Not at Indigo Bar & Grill, no.

13 **Q All right. Can you read the first**
14 sentence of your job description?

15 A For Indigo Bar & Grill?

16 **Q Right.**

17 A At this restaurant located inside of an
 18 RSL, we were never slow.

19 **Q Okay. So when you said, "We were never**
20 slow," you just made that up, correct?

21 MR. EDWARDS: Form.

22 A I tried to give as much information to my
 23 potential employer to show that I could handle a
 24 large amount of pressure and guests. So, yes, I put
 25 that in there.

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1 **Q (BY MS. MENNINGER) But you represented**
2 you were there working as a server or waitress and
3 that we were never slow. That is not true, correct?

4 A Well, I never worked there, so it's --
 5 again, I was very highly unemployable, given my past.
 6 So I did whatever I could to make it look as though
 7 my potential employer could hire me.

8 **Q Okay. You described your duties that were**
9 not -- those were fictional duties, correct?

10 A They were duties that a waitress and a
 11 server would do.

12 **Q But you did not do at Indigo Bar --**

13 A But I did not do them at Indigo Bar &
 14 Grill.

15 **Q Okay. You described your energetic**
16 service and your service with a smile to the guests.
17 That was not true, correct?

18 A Everything in Indigo Bar & Grill is not
 19 correct.

20 **Q And you created that entire description,**
21 correct?

22 A For the sole purpose of being able to
 23 obtain employment, yes.

24 **Q To get money?**

25 MR. EDWARDS: Form.

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1 A To make a wage for my family.

2 **Q (BY MS. MENNINGER) All right. The next**

3 **job, Gemma Catering and Wedding Receptions, did it --**

4 **is that a job that you actually held?**

5 A I did actually work there. I don't know

6 the dates, but I was a server, waitress and

7 bartender.

8 **Q March of 2003 to April 2004, is that about**

9 **when you worked there?**

10 A It could be very close to it. I'm not too

11 sure.

12 **Q You're not sure?**

13 A No, I'm not sure.

14 **Q Did you have children -- had you already**

15 **had children at the time you worked there?**

16 A No, I do not believe I did. I became a

17 stay-at-home mom when I had my first child.

18 **Q And what year was that?**

19 A 2006.

20 **Q Okay. So you believe you worked at Gemma**

21 **Catering and Wedding Receptions before 2006?**

22 A I believe so.

23 **Q And other than that, you can't recall what**

24 **dates you worked there?**

25 A I'm sorry, I couldn't help, no.

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1 **Q All right. And then what were your**

2 **actual -- is that your actual job that you had there?**

3 A The description of it?

4 **Q The title, server, waitress, bartender?**

5 A Yes.

6 **Q All right. Is the description accurate?**

7 A To a T.

8 **Q What's that?**

9 A To a T.

10 **Q Okay. The next job you list is Mannway**

11 **Logistics, Logistics Receptionist.**

12 **Is that a job you actually held?**

13 A It is a job I held.

14 **Q And when did you hold it?**

15 A Again, I'm very bad at dates. I'm not too

16 sure.

17 **Q All right. Approximately when did you**

18 **have it?**

19 A I don't want to speculate and give you the

20 wrong answer, so I'm not too sure.

21 **Q Did you have children at the time you**

22 **worked there?**

23 A No.

24 **Q So before 2006?**

25 A Yes.

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1 **Q And after you moved to Australia, which**

2 **was what year?**

3 A I moved to Australia at the end of 2002, I

4 believe.

5 **Q All right. Do you recall going to work**

6 **shortly after you got to Australia?**

7 A Yes.

8 **Q How --**

9 A I had to obtain my -- my ability to work

10 there. So I think that took a couple months. You

11 can get a temporary visa that allows you to work

12 while you're waiting for your permanent resident

13 status, and that's what we did.

14 **Q All right. Were you able to apply for**

15 **that temporary job permission before you actually got**

16 **married in Australia?**

17 A I got married in Aus -- we were married in

18 Thailand, really, but we made it official in January

19 of 2003. And within a couple of weeks, I was granted

20 the permission to work in Australia legally.

21 **Q Okay. So to the best of your**

22 **recollection, you got permission to work in Australia**

23 **sometime in the spring of 2003?**

24 MR. EDWARDS: Form.

25 A That's actually summer over there.

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1 **Q (BY MS. MENNINGER) Fair enough. The**

2 **first quarter of the year, calendar year --**

3 A Yes.

4 **Q -- 2003?**

5 A If we're going to be politically correct,

6 yes.

7 **Q That's what you recall?**

8 A (Indicating.)

9 I'm sorry, yes.

10 **Q And is your description of Mannway**

11 **Logistics correct?**

12 A Yes.

13 **Q All right. And how long did you work**

14 **there?**

15 A I think that was less than a year that I

16 worked there. I would approximate about six, seven

17 months.

18 **Q Can you name one coworker you had or boss**

19 **or anybody else that worked there?**

20 A I know her name started with an M, but I

21 can't remember. I remember what she looks like. I

22 just don't remember her name.

23 **Q Okay. And how much did you make there?**

24 A I don't remember the exact amount.

25 Approximately about \$20 an hour, I think.

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1 **Q And how many hours per week were you**
 2 **working for that six months to a year?**
 3 A I believe that was full time.
 4 **Q And is full time the same in Australia?**
 5 A Yeah it's a 40-hour week.
 6 **Q Okay.**
 7 A Well, 38 because you get two hours of
 8 lunch, so, yes.
 9 **Q All right. Have you been in touch with**
 10 **anyone from that employment in a while?**
 11 A No.
 12 **Q All right. The next job listed there is**
 13 **what?**
 14 A Calmao Flamenco Bar & Restaurant.
 15 **Q Is that someplace you actually worked?**
 16 A No, it's not.
 17 **Q Is that a place that actually exists?**
 18 A I don't really know.
 19 **Q All right.**
 20 A I mean, I think I looked on the Internet
 21 and found something similar to what the description I
 22 was needing to fill, and that was it.
 23 **Q Okay. So when you were creating this**
 24 **document in 2013/2014, right, that's when you had the**
 25 **Titusville address?**

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1 A Yes.
 2 **Q All right. You went on the Internet and**
 3 **you searched for a place that would be like the job**
 4 **you were looking for?**
 5 A Correct.
 6 **Q And you found the name of an actual place,**
 7 **Calmao Flamenco Bar & Restaurant.**
 8 **Did I get that right?**
 9 A I'm not 100 percent on that, but I think
 10 so.
 11 **Q Okay. And you did that in order to**
 12 **impress the employer you were applying for here in**
 13 **the e-mail, correct?**
 14 A Correct.
 15 **Q All right. And you did that in order to**
 16 **get money from a job that you hoped to get from this**
 17 **employer in the e-mail, correct?**
 18 A I was hoping to gain employment. And not
 19 having much experience, I put in there that I had
 20 experience.
 21 **Q Okay. And you said that you had been**
 22 **advised to plump up your resume by a job agency; is**
 23 **that right?**
 24 A Yes.
 25 **Q What was the name of that job agency?**

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1 A Before I worked at ET Australia, I was
 2 actually a job seeker there. And a job seeker, I
 3 don't know if you're familiar with the term.
 4 Somebody who is looking for work and you
 5 go to a job agency, and you go look on the computer.
 6 And you actually have somebody who helps you find
 7 employment. And they are the ones who recommend that
 8 you show that you've continuously worked throughout
 9 your years. They ended up really liking me, so
 10 that's how I got the job there.
 11 **Q Okay. Was it a particular person there**
 12 **that gave you the advice to plump up your resume?**
 13 A It would have been one of the counselors.
 14 **Q Which one?**
 15 A I don't know.
 16 **Q Okay. Do you remember the names of any of**
 17 **the counselors?**
 18 A I only remember the name of one of the
 19 girls I worked with, but I don't remember -- I don't
 20 remember anyone else's name.
 21 **Q When did you first become a job seeker at**
 22 **ET Australia?**
 23 A Well, if I finished there in 2006 and I
 24 worked there for approximately a year, it would have
 25 been 2005 -- late 2004, 2005. I'm not too sure.

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1 **Q Okay. So you were a job seeker there**
 2 **first and then got employment there, right?**
 3 A Yes.
 4 **Q Okay. So the advice to plump up your**
 5 **resume was while you were seeking a job or while you**
 6 **were employed there?**
 7 A While I was seeking a job.
 8 **Q All right. And you were assigned a**
 9 **counselor?**
 10 A Yes.
 11 **Q One or more than one?**
 12 A It changes on a daily basis. There's
 13 somebody who comes into the office and they sit with
 14 you and they help you with your resume. And then
 15 they help you go on the computer and look for open
 16 vacancies.
 17 **Q So someone in approximately 2005 gave you**
 18 **the advice to plump up your resume. That's what**
 19 **you're saying?**
 20 A To make it look like I've continuously
 21 worked, yes.
 22 **Q Okay. So back to Calmao Flamenco Bar &**
 23 **Restaurant, which is a place you found on the**
 24 **Internet but did not actually work. Is that, the**
 25 **dates for your employment there, December 2001 to**

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1 **February 2003, not true, correct?**
 2 A Obviously, yes. At that time I was --
 3 during 2001 I was with Jeffrey and Ghislaine being
 4 trafficked.
 5 **Q Um-hum. So you were not working at Calmao**
 6 **Flamenco Bar --**
 7 A Obviously not, yes.
 8 **Q And you said you got to Australia in**
 9 **late '02 and did not work there between late '02 and**
 10 **February of ' 03, correct?**
 11 A I've never worked at Calmao Flamenco Bar &
 12 Grill, period.
 13 **Q All right. And the job description that**
 14 **you crafted there is also fictional, correct?**
 15 A Yes.
 16 **Q All right. And Mar-a-Lago Resort and Spa**
 17 **you put down as a place you had worked, correct?**
 18 A Correct.
 19 **Q And you typed in August 2000 to September**
 20 **2001, correct?**
 21 A Correct.
 22 **Q And you created your job description**
 23 **there, correct?**
 24 A Correct.
 25 **Q All right. And then turning to the last**

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1 **page you have your education, correct?**
 2 A Can I just make a statement to say that,
 3 again, with the Mar-a-Lago Resort and Spa, I did have
 4 to add dates to make it look as though I had
 5 continuously worked. So those, again, are incorrect
 6 dates.
 7 **Q But it is a date that you typed into a**
 8 **resume in 2013 or 2014 --**
 9 A That is the date that --
 10 **Q If you could just let me finish my**
 11 **question.**
 12 A Sure.
 13 **Q That is a date that you typed into your**
 14 **resume in 2013 or 2014, correct?**
 15 A That is the date that I did type in, but
 16 those are incorrect dates.
 17 **Q All right.**
 18 A And, as well as the -- the position,
 19 organizing, making and canceling appointments for
 20 massage therapists.
 21 **Q All right.**
 22 A I mean, I was their locker room attendant.
 23 I just wanted it to sound like I had more
 24 receptionist experience than I did.
 25 **Q You wanted it to look like you had more**

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1 **experience than you had had, correct; that's what you**
 2 **just said?**
 3 A Correct, I mean given that my past had not
 4 enabled me to be able to look for work or I wasn't
 5 able to put down what I actually had -- had to do in
 6 my past. So I made it look as though I was able to
 7 be employed.
 8 **Q You did not have the past that you thought**
 9 **the employer was looking for, right?**
 10 A I couldn't put down on there that I was
 11 sex trafficked for a couple years and did not have
 12 the experience to be able to apply for jobs and
 13 provide for my family.
 14 So this is something that I said. Again,
 15 I am not proud of, but I felt was necessary to do to
 16 be able to gain employment.
 17 **Q All right. So you were applying for a job**
 18 **at a restaurant, right?**
 19 A At this -- according to the front e-mail,
 20 yes.
 21 **Q All right. And you did not put down Taco**
 22 **Bell on this resume, correct?**
 23 A No. The only jobs on here are the ones
 24 that we have mentioned.
 25 **Q Right. And so why did you choose August**

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1 **of 2000 as your start date for Mar-a-Lago?**
 2 A It just looks as though I've given them a
 3 longstanding history of employment.
 4 **Q You chose a month. Why did you choose**
 5 **that month?**
 6 A I chose months and dates for every single
 7 position on that resume. There is no specific reason
 8 why I chose that month. It was just purely to show
 9 that I was continuously employed.
 10 **Q On the last page it has some education.**
 11 **Which part of that is untrue?**
 12 MR. EDWARDS: Object to the form.
 13 A I have received my business admin cert 3
 14 from ET Australia. I've never held responsible
 15 service of alcohol and gambling.
 16 **Q (BY MS. MENNINGER) Do you understand that**
 17 **to be a licensing of some sort or a class? Or what**
 18 **do you understand that --**
 19 A In Australia you have to have something
 20 called an RSA and RCG to be able to work as a
 21 waitress or bartender or anything. And I didn't know
 22 if it was the same out here in America. So I put
 23 down that I had.
 24 I had taken a CPR and first aid. I don't
 25 remember when, but it's not current.

1 And I did go to Royal Palm Beach High
 2 School and I didn't put down a degree there or
 3 anything.
 4 **Q So is it fair to say you never worked as a**
 5 **waitress in Australia. Is that what you just said?**
 6 A I did work as a waitress at Gemma
 7 Catering.
 8 **Q Oh, okay.**
 9 A I don't believe I needed my RSA to work
 10 there. I'm not too sure.
 11 **Q All right. And if I could just ask you**
 12 **one other question about Gemma Catering. In the last**
 13 **line of the job description it says: This job was a**
 14 **second job. I would work in the evenings and**
 15 **weekends for saving extra cash.**
 16 **What was it a second job to?**
 17 A If my time period is right, it would be my
 18 second job to Mannway Logistics because they were
 19 both -- Gemma Catering and Mannway Logistics were
 20 both in Sydney, whereas ET Australia was on the
 21 central coast.
 22 **Q All right. ET Australia is on the central**
 23 **coast?**
 24 A Correct.
 25 **Q And Gemma and Mannway are in Sydney?**

1 A In Sydney, yeah.
 2 **Q All right. Got it.**
 3 **Do you know if those two organizations**
 4 **still exist?**
 5 A Mannway, I would definitely say, it's a --
 6 it's a large logistic company. I would say it still
 7 does exist.
 8 Gemma Catering, I'm not too sure if that
 9 exists anymore or not.
 10 **Q Okay. All right. So did you spend your**
 11 **16th birthday with Ghislaine Maxwell and Jeffrey**
 12 **Epstein?**
 13 A No. I was 16 when I met them, now that I
 14 know the correct dates. So I would have spent my
 15 17th birthday with them.
 16 **Q So when you represented that you spent**
 17 **your 16th birthday with Ghislaine Maxwell and Jeffrey**
 18 **Epstein, that was not true, correct?**
 19 A At my ability at the time, that's what I
 20 believed to be true. It wasn't until I found the
 21 Mar-a-Lago records stating the year 2000. Me being
 22 born in 1983 would make me turning 17 that year.
 23 **Q So please describe for me your 17th**
 24 **birthday that you claim you spent with Ghislaine**
 25 **Maxwell and Jeffrey Epstein.**

1 A I remember spending a birthday with them
 2 on Jeffrey Epstein's island called Little Saint
 3 Jeff's. I wouldn't say it was a party. It was just
 4 Ghislaine, me, Jeffrey. I believe [REDACTED] was
 5 there. I got some presents from them.
 6 **Q What presents did you get?**
 7 A Ghislaine gave me a whole bunch of makeup,
 8 like boxes of different kinds of eye shadows and
 9 lipsticks and just makeup altogether.
 10 Jeffrey gave me a bracelet and, I think
 11 earrings.
 12 **Q What kind of earrings?**
 13 A They were what I believed to be diamonds.
 14 I don't know what they exactly were. I think Jeffrey
 15 was talking about, they could have been passed off as
 16 good knock-offs. But they appeared to be diamonds.
 17 **Q Any other presents?**
 18 A I remember the makeup and the jewelry. I
 19 don't remember much else.
 20 **Q And that was your 17th birthday, you said?**
 21 MR. EDWARDS: Form.
 22 A It's hard for me to really pinpoint
 23 exactly which birthday it was.
 24 **Q (BY MS. MENNINGER) So it could have been**
 25 **your 18th or your 19th?**

1 A I don't want to lock down on which exact
 2 birthday it could have been without knowing.
 3 **Q You don't know which birthday it was; is**
 4 **that what you're saying?**
 5 A The one that I'm specifically telling you
 6 about?
 7 **Q Right. You don't know which one?**
 8 A No.
 9 **Q All right. Do you remember spending more**
 10 **than one birthday with Jeffrey Epstein and Ghislaine**
 11 **Maxwell?**
 12 A Yes.
 13 **Q Okay. Tell me about the other ones that**
 14 **you remember.**
 15 A Well, I know my 19th birthday. I can't
 16 remember, really, my 18th birthday. But my 19th
 17 birthday we celebrated it early, earlier than my
 18 actual date of birth. And that's when he surprised
 19 me with tickets to Thailand.
 20 **Q What do you mean he surprised you with**
 21 **tickets to Thailand?**
 22 A He told me that the tickets for Thailand
 23 were for my birthday.
 24 **Q Did he hand you something that looked like**
 25 **a ticket to Thailand? What do you mean?**

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1 A He didn't hand me the tickets at that
 2 time, but he told me that he had booked me in for
 3 massage training at an institute in Chiang Mai.
 4 **Q And he told you he had booked you tickets**
 5 **to a massage training in Chiang Mai, Thailand**
 6 **sometime before your actual 19th birthday?**
 7 MR. EDWARDS: Form.
 8 **Q (BY MS. MENNINGER) Did I get that right?**
 9 A Yes.
 10 **Q Okay. Did he hand you --**
 11 A Excuse me.
 12 **Q -- hand you anything at that time?**
 13 A No, I don't think so.
 14 **Q And where were you located when he told**
 15 **you this about the Thailand massage training?**
 16 A Jeffrey, Ghislaine and I had just gone
 17 scuba -- not scuba diving, not with the big tanks,
 18 but snorkeling with just the mask and the two-piece,
 19 and on Jeffrey's island, by the way.
 20 And we had gone out for a while. And we
 21 had come back. And he's got a pier where it's got a
 22 ladder and you climb up. And we were wearing wet
 23 suits. So we were taking off our flippers and our
 24 wet suits and all of our gear.
 25 And they said they wanted to sit down and

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1 talk to me, just the three of us. And he -- first,
 2 he told me about the --
 3 **Q If I could just stop you. I think I asked**
 4 **where were you --**
 5 A Oh, I'm sorry.
 6 **Q -- when you had this conversation about**
 7 **the --**
 8 A Just the island. I'm just trying to
 9 describe the instance that he gave it to me.
 10 **Q Oh, okay.**
 11 A It was on the island, on the pier in the
 12 Caribbean.
 13 **Q Okay. And it was sometime before your**
 14 **19th birthday?**
 15 A Correct.
 16 **Q How much time before?**
 17 A I don't know. A couple -- six weeks, a
 18 couple of months. I don't know. Close to my
 19 birthday. It was my birthday present, that's what he
 20 told me.
 21 **Q Okay. So you don't know when you had this**
 22 **conversation?**
 23 MR. EDWARDS: Form.
 24 A I mean, I -- no, I didn't record the time
 25 and the date, so I can only speculate. It was

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1 shortly before my birthday, but not my birthday.
 2 **Q (BY MS. MENNINGER) Okay. And he told you**
 3 **he had booked you tickets to go to Thailand, right?**
 4 A Correct.
 5 **Q All right. So you remember one birthday**
 6 **at which you received makeup, bracelet and earrings**
 7 **and one birthday at which you received tickets to**
 8 **Thailand.**
 9 **Do you remember any other birthdays that**
 10 **you spent with Jeffrey Epstein and/or Ghislaine**
 11 **Maxwell?**
 12 A I'm sure there is, but I honestly can't
 13 remember what I did for my 18th birthday.
 14 **Q Okay. Well, I'm sorry, did you know for**
 15 **sure that the bracelet, earrings and makeup were from**
 16 **your 17th birthday, or do you know?**
 17 A I don't know.
 18 **Q But you know they were not for your**
 19 **16th birthday, right?**
 20 A Correct.
 21 **Q All right. If I could have you go back to**
 22 **Defendant's Exhibit 1, I think.**
 23 A Defendant's, sorry, Exhibit 1?
 24 **Q Um-hum. Page 9, either at the bottom or**
 25 **in the upper right-hand corner.**

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1 **Do you see that page?**
 2 A Page 9 of 27, yes.
 3 **Q All right. And paragraph 23, do you see**
 4 **that paragraph?**
 5 A I see the paragraph.
 6 **Q All right.**
 7 A I was just going to read it over quickly.
 8 **Q By all means.**
 9 A I've read it.
 10 **Q And the sentence, Defendant and**
 11 **Ms. Maxwell acknowledged and celebrated plaintiff's**
 12 **16th birthday, is not a true statement, correct?**
 13 A Only upon learning about the fact that I
 14 just found out my records. I assumed at the time it
 15 was my 16th birthday. But now we know different.
 16 **Q You admit, as you sit here today, that**
 17 **defendant and Ms. Maxwell did not celebrate your 16th**
 18 **birthday with you, correct?**
 19 A Correct, based upon the records.
 20 **Q Which you don't know when you saw?**
 21 A I know it was, you know, it wasn't -- it
 22 wasn't a year ago, but it wasn't that long ago
 23 either. So I'm not too sure. I can't tell you the
 24 date that I actually saw them.
 25 **Q All right. Last year you lived in**

1 **Colorado for part of the year, correct?**
 2 A For part of the year, yes.
 3 **Q And then you moved to Australia, correct?**
 4 A Yes.
 5 **Q You did not live in Florida at any point**
 6 **in time during 2015, correct?**
 7 A I believe I left Titusville at the end of
 8 2014.
 9 **Q Okay. So you did not live in Florida**
 10 **during 2015, correct?**
 11 A I believe so.
 12 **Q All right. So when you reviewed these**
 13 **records sometime in 2015 that caused you to know the**
 14 **real date of when you worked at Mar-a-Lago, where**
 15 **were you physically located?**
 16 MR. EDWARDS: Object to the form and
 17 mischaracterized her testimony.
 18 A I don't remember where I saw these
 19 records, when I saw these records. I know it wasn't
 20 a year ago. I know it was more recent. I can't
 21 pinpoint the date that I actually saw them, but I
 22 recently, I believe -- I don't know. I don't want to
 23 sit here and speculate and then give you the wrong
 24 answer. It's just new knowledge for me.
 25 **Q (BY MS. MENNINGER) All right. Did you**

1 mischaracterized her testimony. She actually just
 2 testified that she may have heard that.
 3 MS. MENNINGER: No, you're not testifying.
 4 I've asked her --
 5 MR. EDWARDS: I'm clearing the record up
 6 right now, though.
 7 MS. MENNINGER: You can object based on
 8 form. That's a valid objection. You've made your
 9 record.
 10 **Q (BY MS. MENNINGER) Did you review records**
 11 **that clarified dates for you?**
 12 A I've either reviewed them or I've been
 13 told about -- I can't remember. I'm sorry. I
 14 know -- I know now that the dates are what they are,
 15 but I don't remember.
 16 **Q You don't know when you learned that the**
 17 **dates are what they are?**
 18 A No, I don't.
 19 **Q And your best guess is what?**
 20 MR. EDWARDS: Objection.
 21 If any of your answer is based on
 22 attorney-client privilege, I'm instructing you not to
 23 answer.
 24 A I can't answer, then.
 25 **Q (BY MS. MENNINGER) Okay. So have your**

1 **receive the records by e-mail?**
 2 A I believe so.
 3 **Q Okay. Did you use any e-mail address**
 4 **other than [REDACTED]**
 5 A No.
 6 **Q That's the only e-mail address that you've**
 7 **used?**
 8 A That's correct.
 9 **Q And the Mar-a-Lago records that you**
 10 **reviewed you received by e-mail at that e-mail**
 11 **address?**
 12 A Possibly. I mean, I can't say
 13 100 percent. I could have been told about them. I
 14 could have seen them on a piece of paper. I really
 15 don't know. This is a very hazy subject. All I know
 16 is that I found out and that was able to clarify a
 17 lot of dates for us.
 18 **Q Okay. What other dates were clarified?**
 19 MR. EDWARDS: I object and instruct the
 20 witness not to answer if any of your knowledge is
 21 based on any privileged communication that you had
 22 between yourself and any of your lawyers.
 23 **Q (BY MS. MENNINGER) Okay. You just said**
 24 **you reviewed records yourself, correct?**
 25 MR. EDWARDS: Object. That

1 **attorneys told you to change your dates?**
 2 MR. EDWARDS: Objection.
 3 Do not answer that question. This is a
 4 question intentionally devised to invade the
 5 attorney-client privilege.
 6 She's not going to answer those questions.
 7 **Q (BY MS. MENNINGER) You can answer a**
 8 **question about whether your attorneys had told you to**
 9 **lie. Because that would be a crime, and I'm sure --**
 10 A I will --
 11 **Q -- I'm sure you want to tell me that your**
 12 **attorneys did not tell you to lie, correct?**
 13 A I can tell you for a fact my attorneys
 14 have never told me to lie.
 15 **Q All right. And did your attorneys tell**
 16 **you to change a date?**
 17 MR. EDWARDS: Objection. She's not
 18 answering any questions about communications between
 19 her lawyers and herself, period.
 20 **Q (BY MS. MENNINGER) So if I could also**
 21 **direct your attention to Defendant's Exhibit 8. It's**
 22 **the manuscript. If you could turn to page 40.**
 23 THE VIDEOGRAPHER: I just have a quick
 24 request, Counsel.
 25 Ms. Giuffre, would you mind bringing the

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1 mic higher up on your jacket, please?
 2 THE DEPONENT: Sure.
 3 THE VIDEOGRAPHER: Thank you.
 4 THE DEPONENT: Tell me if that's okay.
 5 Better?
 6 A Okay. Page 40?
 7 **Q (BY MS. MENNINGER) Right. Do you see the**
 8 **first full paragraph on that page?**
 9 A I do.
 10 **Q The first line begins: I spent my sweet**
 11 **16th birthday on his island in the Caribbean next to**
 12 **Little (sic) St. James Isle. He liked to call it**
 13 **Little St. Jeff's. His ego was enormous as his**
 14 **appetite for fornicating.**
 15 **Do you see that sentence?**
 16 A I do.
 17 **Q That is not true, correct? You were not**
 18 **spending your sweet 16th birthday on Little St. James**
 19 **Isle, correct?**
 20 A Based on my knowledge at the time that I
 21 wrote this manuscript, I thought I did spend my 16th
 22 birthday there. And so I put it down in there as
 23 that. Now I know that it wasn't my 16th birthday.
 24 **Q Or your sweet 16th birthday?**
 25 A Well, we --

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1 MR. EDWARDS: Object to the form.
 2 Harassing.
 3 **Q (BY MS. MENNINGER) Was it your sweet 16th**
 4 **birthday?**
 5 A Is it not custom to call your 16th
 6 birthday sweet? Have you never heard that saying
 7 before?
 8 **Q Was it your sweet 16th birthday,**
 9 **Ms. Giuffre?**
 10 A As we --
 11 MR. EDWARDS: She's answered the question.
 12 It's been asked and answered.
 13 MS. MENNINGER: She asked me a question,
 14 actually. You're not testifying here.
 15 **Q (BY MS. MENNINGER) Was it your sweet 16th**
 16 **birthday?**
 17 A As I thought, in the manuscript when I
 18 wrote it, I thought it was my sweet 16th birthday.
 19 **Q Okay. Now that you know it wasn't, where**
 20 **did you spend your sweet 16th birthday?**
 21 A Well, I don't know.
 22 **Q Well, just give us your best guess.**
 23 MR. EDWARDS: Objection. And she's not
 24 going to guess today. She's going to tell you the
 25 answers as she remembers them.

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1 If you remember the answer, please tell
 2 her the answer.
 3 A I don't know the answer, where I spent my
 4 sweet 16th birthday.
 5 **Q (BY MS. MENNINGER) Do you know who you**
 6 **were with on your sweet 16th birthday?**
 7 A No, I don't.
 8 **Q Do you know where you lived on your sweet**
 9 **16th birthday?**
 10 A No, I don't.
 11 **Q Were you living with your parents on your**
 12 **sweet 16th birthday?**
 13 A I don't know.
 14 **Q Were you living with [REDACTED] on your sweet**
 15 **16th birthday?**
 16 A I don't know. I was a runaway a lot. I
 17 don't know where I lived at the time.
 18 **Q Okay. Were you working at Taco Bell on**
 19 **your sweet 16th birthday?**
 20 A I don't think so. I don't know.
 21 **Q Were you working at Publix on your sweet**
 22 **16th birthday?**
 23 A I don't know.
 24 **Q Were you working at an aviary on your**
 25 **sweet 16th birthday?**

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1 A Again, I don't know.
 2 **Q Do you recall any present you actually got**
 3 **on your sweet 16th birthday?**
 4 A No, I don't. I don't know where I spent
 5 it, who I spent it with or what I got. I'm sorry.
 6 **Q How long did you work at Mar-a-Lago?**
 7 A Best of my recollection, it was a summer
 8 job. I believe I started in June. And I think I
 9 only worked there approximately two weeks, two, three
 10 weeks.
 11 **Q How many hours a week did you work?**
 12 A I want to say it was a -- I want to say
 13 it's a full-time job.
 14 **Q Do you recall it being a full-time job?**
 15 A It was a summer job, but just thinking
 16 back, my dad used to bring me in and bring me home.
 17 So he worked full time, all day. So -- and I didn't
 18 lounge around Mar-a-Lago so, yes, I think it would
 19 have been a full-time job.
 20 **Q And how much did you make per hour?**
 21 A Approximately, I think I remember making
 22 \$9 an hour.
 23 **Q The bracelet and earrings you got for your**
 24 **birthday, some birthday, on Little -- or where was**
 25 **that birthday party, at Little St. James?**

1 MR. EDWARDS: Object to the form.
 2 **Q (BY MS. MENNINGER) Where was it?**
 3 A At Little Saint Jeff's.
 4 **Q Okay. Where are those bracelet and**
 5 **earrings now?**
 6 A I left everything behind me when I went to
 7 Thailand.
 8 **Q Where did you leave them, exactly?**
 9 A I had a storage facility and my apartment
 10 that I lived in.
 11 **Q So where were they, in the storage**
 12 **facility or in the apartment?**
 13 A Most likely in the apartment.
 14 **Q Okay. What apartment was that?**
 15 A Royal Palm Beach. I don't know the
 16 address, I'm sorry.
 17 **Q You don't know the address at all?**
 18 A Not at all.
 19 **Q Okay. Where was it roughly located in**
 20 **Royal Palm Beach?**
 21 A I don't know. It's been a long time since
 22 I've been back to Royal Palm. I don't remember
 23 street names or anything.
 24 **Q Did it have one or two bedrooms?**
 25 A It was two bedrooms.

1 **Q Was it on the first or second floor?**
 2 A The second floor.
 3 **Q Who lived there with you?**
 4 A [REDACTED] first lived there with me.
 5 [REDACTED] and I broke up shortly after living there.
 6 And [REDACTED] lived there with me.
 7 **Q Okay. And that's the apartment that you**
 8 **left when you went to Thailand?**
 9 A Yes.
 10 **Q Did you live at more than one apartment**
 11 **with [REDACTED]**
 12 A When I was a runaway, he let me stay at
 13 his apartment.
 14 **Q Was that a different apartment?**
 15 A Yes.
 16 **Q All right. So you lived at [REDACTED]**
 17 **apartment when you were a runaway?**
 18 A Correct.
 19 **Q And did you live anywhere else other than**
 20 **those two apartments with [REDACTED]**
 21 A We stayed at [REDACTED] parents' house, I
 22 think for a few weeks before the apartment.
 23 **Q Okay. The apartment that you rented?**
 24 A The apartment that [REDACTED] rented. I
 25 think I was too young to go on a lease.

1 **Q Well, all right. We'll come back to that**
 2 **in a minute. But the apartment that you left in 2002**
 3 **was the one in Royal Palm Beach that you lived at**
 4 **originally with [REDACTED] and then after breaking up**
 5 **with [REDACTED] [REDACTED] lived there? That's the one we're**
 6 **talking about?**
 7 A Correct.
 8 **Q That's the apartment we're talking about?**
 9 A That's not the one that --
 10 **Q Okay.**
 11 A Sorry. I'm confused. Could you please
 12 reask the question?
 13 **Q All right. I asked you where you left**
 14 **your bracelet or earrings. You think you --**
 15 A Okay, yes.
 16 **Q -- left them in an apartment, correct?**
 17 A Okay. Yes. Yeah, not the one -- not the
 18 first one. The one where [REDACTED] eventually moved into.
 19 **Q That's the apartment you left the bracelet**
 20 **and earrings at?**
 21 A I believe so, yes.
 22 **Q So when you were working at Mar-a-Lago,**
 23 **you rode with your father every day?**
 24 A Yes.
 25 **Q What car did he drive at the time?**

1 A I don't know.
 2 **Q Okay. Did you have a vehicle of your own**
 3 **at the time?**
 4 A No.
 5 **Q Did you have a driver's license at the**
 6 **time?**
 7 A Yes. I got my permit when I was 15 and my
 8 driver's license when I was 16.
 9 **Q Okay. And how were you paid, by cash or**
 10 **check or some other method?**
 11 A I don't remember.
 12 **Q Did you have a bank account at that time?**
 13 A I don't think I've ever had a bank
 14 account -- well, up until recently, living here. I
 15 don't remember having a bank account.
 16 **Q So you believe you got paid by unknown**
 17 **means and you did not deposit it into a bank?**
 18 A Correct.
 19 **Q What was your uniform when you worked**
 20 **there?**
 21 A At Mar-a-Lago?
 22 **Q Right.**
 23 A It was a white miniskirt with a little
 24 white polo top with the emblem of Mar-a-Lago on it.
 25 **Q Did they give you more than one?**

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1 A I don't know, maybe.

2 **Q Did you wear it to and from work every**

3 **day?**

4 A Yes.

5 **Q Did you get new ones when you arrived that**

6 **were clean or did you launder them at home?**

7 A I would have had to wash them when I got

8 home, I suppose.

9 **Q And you think you had more than one or you**

10 **don't recall?**

11 A I don't recall.

12 **Q All right. Was that something you**

13 **purchased or did they give it to you?**

14 A They gave it to me.

15 **Q And who else was wearing that uniform?**

16 A The other locker -- the lady that did the

17 front desk next to the locker rooms.

18 **Q She had the same one?**

19 A Yes.

20 **Q Was that Adriana?**

21 A I don't think Adriana wore a uniform. I

22 think she just dressed professional.

23 **Q Okay. And what other employees did you**

24 **see there at the spa at the time when you worked**

25 **there?**

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1 A There were -- well, this is in the massage

2 area and there's also like a fitness area. So

3 there's spa and fitness. So there would be the

4 masseuses and then there would be the trainers. And

5 that was just located in that one area away from the

6 main house and stuff.

7 **Q And is that the area in which you worked?**

8 A Yes.

9 **Q In the spa area or the fitness area?**

10 A The spa and the fitness area were in the

11 same complex.

12 **Q Okay. What did the other people who**

13 **worked in the spa area wear?**

14 A I don't remember what they wore.

15 **Q All right. And what did the people in the**

16 **fitness area wear?**

17 A I don't remember. I know it was -- we had

18 our own uniforms. Everyone else had their own.

19 **Q Who is we?**

20 A Well, the girls that worked in the meet

21 and greet area. Me and the other girl with the curly

22 hair I told you about --

23 **Q Um-hum.**

24 A -- had our own uniforms. And then the

25 fitness people had their own uniforms. And the

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1 masseuses had their own uniforms.

2 **Q What did the masseuses' uniform look like?**

3 A I don't remember.

4 **Q No recollection at all?**

5 A None whatsoever.

6 **Q Color?**

7 A No, sorry. I remember mine.

8 **Q Okay. How did it come to pass that you**

9 **were no longer working at Mar-a-Lago in two to three**

10 **weeks?**

11 A I was approached by Ghislaine Maxwell.

12 **Q Okay. And how long had you been working**

13 **at Mar-a-Lago when you were approached by Ghislaine**

14 **Maxwell?**

15 A Roughly two to three weeks.

16 **Q Okay. Where in the spa were you when you**

17 **were approached by Ghislaine Maxwell?**

18 A Just outside the locker room, sitting

19 where the other girl that works there usually sits.

20 She was away from the desk. I was reading a book on

21 massage therapy.

22 **Q Was that indoors or outdoors?**

23 A Outdoors.

24 **Q Okay. And what -- were you in the sun or**

25 **in the shade?**

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1 A In the shade underneath a -- I don't know

2 what you'd like to call it, but, you know, underneath

3 the complex, the building.

4 **Q All right. And what was Ghislaine Maxwell**

5 **wearing when she approached you?**

6 A I don't remember what she was wearing.

7 **Q Any recollection, color of clothing or**

8 **anything?**

9 A No.

10 **Q Okay. Any details about her? Was she**

11 **carrying a purse or anything?**

12 A No. She looked like, from my memory, she

13 looked like she was either there for a massage or

14 fitness. I remember she had a British accent. She

15 was very interested in the book that I was reading.

16 I mean, we can get into some more details

17 later if you'd like, but I don't remember any more

18 about what she was wearing that day.

19 **Q Did you have a cell phone at that time?**

20 A No.

21 **Q Where were you living at that time?**

22 A At my parents'.

23 **Q And who else was living there with you at**

24 **the time?**

25 A My mother and my dad and my brother.

1 **Q Which brother?**
 2 A [REDACTED]
 3 **Q What about your other brother?**
 4 A I think he had moved out by then.
 5 **Q What forms of communication did you have?**
 6 **Just a home phone number, or what?**
 7 A Yeah, there was a home phone.
 8 **Q When do you recall ever getting a cell**
 9 **phone?**
 10 A The first cell phone I ever got was the
 11 one that Ghislaine gave to me.
 12 **Q So you never had -- your parents, did they**
 13 **have ones when you were working at Mar-a-Lago?**
 14 A No, my dad used to -- like, we had phones
 15 in the spa and maintenance area and so on, so forth.
 16 And you could, so to speak, page people from around
 17 the courts.
 18 **Q Okay. So tell me what you recall of the**
 19 **first conversation that you had with Ghislaine**
 20 **Maxwell.**
 21 A I'm sitting there reading my book about
 22 massage therapy, as I'm working in the spa. And I'm
 23 getting my GE -- well, I was in the process of
 24 getting my GED before I went to my summer job. I
 25 decided that I would like to become a massage

1 therapist one day. And the body really intrigued me,
 2 you know, reading this massage was a lot about
 3 anatomy, blood flow. Everything to do with, you
 4 know, touching somebody somewhere and then triggering
 5 a result somewhere else. I just was very intrigued
 6 by the whole anatomy thing.
 7 She came up, Ghislaine, sorry. Ghislaine
 8 came up and approached me at the desk that I was
 9 sitting at. And my book was like this (indicating)
 10 and she said, Oh, you're reading a book about
 11 massage. You want to do massage? And I told her,
 12 Yes, you know, I'm very interested in it. One day I
 13 would like to become a masseuse.
 14 **Q All right. Where did you get the book on**
 15 **massage?**
 16 A Maybe the library.
 17 **Q Maybe or do you recall?**
 18 A I don't think I purchased it. So I'd have
 19 to say the library.
 20 **Q Okay. What library was that?**
 21 A Whichever library was close to my house.
 22 **Q Do you remember a library being close to**
 23 **your house?**
 24 A There's one in Wellington that I used to
 25 go to. Oh, no, there's one in Royal Palm. Yeah,

1 there's one in Royal Palm and Wellington, and I used
 2 to go to both.
 3 **Q Did you have a card for both?**
 4 A Did I have a card?
 5 **Q A library card?**
 6 A Yeah.
 7 **Q For both places?**
 8 A To be able to rent out a book, yeah.
 9 **Q Okay. So the best of your recollection is**
 10 **you used one of your library cards at one of those**
 11 **two libraries to check out a book on massage and**
 12 **anatomy?**
 13 A Correct.
 14 **Q And when did you do that relative to**
 15 **starting at Mar-a-Lago?**
 16 A Probably within the first week. I mean, I
 17 saw what the massage therapists got to do. I mean,
 18 their jobs were so relaxing. The music, like the
 19 atmosphere, they always had happy clients. It just
 20 seems like an ideal job.
 21 **Q And so you were spurred to go to the**
 22 **library and check out a book?**
 23 A Well, I had been talking with the other
 24 massage therapists and they're the ones who first
 25 intrigued me about what they do. And, you know, I

1 wanted to aim for something higher than being a
 2 locker room attendant one day. And. Yeah.
 3 **Q What was the name of the massage therapist**
 4 **that you were speaking with?**
 5 A Oh, I have no idea.
 6 **Q Can you give me any physical description**
 7 **of any of them?**
 8 A Um, there was one who had blonde short
 9 hair. There was -- I would say there's probably
 10 about four massage therapists that work in there.
 11 So, I mean, I don't remember all of them.
 12 **Q Okay. What time of day was it?**
 13 MR. EDWARDS: Object to the form.
 14 A Afternoon.
 15 **Q (BY MS. MENNINGER) How late?**
 16 A Anywhere between 2 to 4.
 17 **Q And what time did you get off of work?**
 18 A I believe I got off at 5.
 19 **Q And what was the rest of your conversation**
 20 **with Ms. Maxwell?**
 21 **I'm sorry, I don't think you finished.**
 22 A Thank you. Well, she noticed I was
 23 reading the massage book. And I started to have
 24 chitchat with her just about, you know, the body and
 25 the anatomy and how I was interested in it. And she

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1 told me that she knew somebody who was looking for a
 2 traveling masseuse.
 3 And I said, Well, I don't have any
 4 accreditations. This is the first book I've ever
 5 read. She goes, That's okay. I know somebody. We
 6 can train you. We can get you educated. You know,
 7 we can help you along the way if you pass the
 8 interview.
 9 If the guy likes you, then, you know, it
 10 will work out for you. You'll travel. You'll make
 11 good money. You'll be educated, and you'll finally
 12 get accredited one day.
 13 **Q Okay.**
 14 A She finished off by, you know, giving me
 15 her number. And I told her I'd have to ask my dad.
 16 And I called my dad. I ran over, actually, to see my
 17 dad, talked to him. He said it would be okay. I
 18 used the phone from Mar-a-Lago to call her and tell
 19 her that I was allowed to come over.
 20 And she said, Great. Meet me here at -- I
 21 don't remember the exact address, but it was
 22 El Brillo Way in Palm Beach -- after you get off.
 23 And my dad drove me.
 24 **Q Did you write down her add -- the address**
 25 **that she gave?**

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1 A Yes.
 2 **Q Did you write down her phone number?**
 3 A Yes.
 4 **Q So did you go run and talk to your dad**
 5 **while she was still there?**
 6 A No, I believe she left. And she told me
 7 to ask my dad and then to give her a phone call.
 8 **Q Okay. Did she ask you your age when she**
 9 **had that conversation with you?**
 10 A No, she did not.
 11 **Q Did you tell her your age?**
 12 A No, I did not.
 13 **Q And so somewhere you wrote down a phone**
 14 **number to call her back at?**
 15 A Um-hum.
 16 **Q All right. And where did you write that**
 17 **down?**
 18 A Probably just a piece of paper lying
 19 around the desk.
 20 **Q Okay. But you don't remember?**
 21 A I mean, no, I don't have that piece of
 22 paper anymore, so no.
 23 **Q Okay. And did you write down an address?**
 24 A Yes.
 25 **Q And what number do you think you called?**

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1 **A cell phone or a home phone, or do you have any**
 2 **idea?**
 3 A I have no idea. Ghislaine answered. So
 4 if it was a home phone, the butlers probably would
 5 have answered. So most likely it was her cell phone.
 6 **Q All right. And what happened when you got**
 7 **off of work?**
 8 A My dad drove me to El Brillo Way.
 9 **Q Um-hum.**
 10 A We arrived at a very large pink mansion.
 11 And we knocked on the door. My dad got out of the
 12 car and we knocked on the door.
 13 **Q Do you recall which car this was?**
 14 A I don't know what he was driving at the
 15 time. My dad always drives trucks. So it would have
 16 been some kind of truck.
 17 **Q But you don't know which kind?**
 18 A I don't know if it was a Ford or a Dodge
 19 or --
 20 **Q What kind of car does your mom drive?**
 21 A Right now?
 22 **Q No, in 2000.**
 23 A Oh, I have no idea. I don't remember.
 24 They change cars quite often. They like getting
 25 different cars.

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1 **Q When did you get your first car?**
 2 A After my trip to London to meet Prince
 3 Andrew.
 4 **Q Okay. What kind of car did you get?**
 5 A A Dodge Dakota.
 6 **Q And did you purchase that yourself?**
 7 A Yes, I did.
 8 **Q And how much did it cost?**
 9 A I don't remember off the top of my head
 10 how much it cost.
 11 **Q Who did you buy it from?**
 12 A My dad helped me bargain with it. I don't
 13 remember where we bought it from.
 14 **Q And was the title put in your name or your**
 15 **dad's name?**
 16 A I think the title was put in my name. I
 17 think. I mean, my dad was with me. I've never
 18 registered a car or anything like that before. So --
 19 **Q So that was your first time?**
 20 A Yes.
 21 **Q Memorable, right?**
 22 A Yes.
 23 **Q When you got there, a butler or someone**
 24 **answered the door, is that what you said?**
 25 A No, Ghislaine answered the door.

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1 **Q Okay. And then what happened?**
 2 A She shook hands with my dad. Like, she
 3 briefly opened the door. She stepped out, shook
 4 hands with my dad. Told her (sic) she'd look after
 5 me and she'd make sure I get a ride home. And just
 6 very briefly, that was it. And my dad left, and I
 7 went inside with Ghislaine.
 8 **Q Did Ghislaine and your dad have any**
 9 **discussion about what it was you were doing there, in**
 10 **your presence?**
 11 A You know, I can't recall exactly what was
 12 said. But I had already told my dad what was -- what
 13 the interview was for. So --
 14 **Q What did you tell your dad?**
 15 A That a very nice lady approached me and
 16 told me that she would offer me an education to
 17 become a massage therapist. And it was a great -- it
 18 would be great experience for me to be able to get
 19 educated and trained and eventually be accredited.
 20 So he was very happy for me as well.
 21 **Q You told him that outside of the presence**
 22 **of Ghislaine?**
 23 A Yes, when I first ran to the tennis courts
 24 where he was at.
 25 **Q And then, in your presence at the home,**

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1 **did your dad and Ms. Maxwell have any conversation --**
 2 **further conversation about what you were doing there?**
 3 A I don't recall. I think they probably
 4 would have chatted for approximately -- maybe 30
 5 seconds. It really wasn't a long chat.
 6 The things that stick out in my mind were,
 7 We will take good care of her and we'll be
 8 bringing -- we will make sure she gets a ride home.
 9 **Q And how far away did you live?**
 10 A Approximately 30 minutes.
 11 **Q And that's with your parents' house,**
 12 **right?**
 13 A That was my parents' house.
 14 **Q Did you see any other employees or any**
 15 **other people inside the house on that day?**
 16 A Yes.
 17 **Q Who else did you see?**
 18 A Juan Alessi.
 19 **Q Um-hum.**
 20 A And Maria. But Jeffrey and Ghislaine like
 21 to call them John and Mary.
 22 **Q Okay. Where did you see John?**
 23 A Downstairs after the whole ordeal.
 24 **Q Um-hum. Which room?**
 25 A The kitchen.

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1 **Q All right. Where did you see Mary?**
 2 A The same place, kitchen.
 3 **Q Were they talking to one another?**
 4 A No. Mary was doing something with the
 5 dishes. They were always either cleaning up or doing
 6 stuff, so --
 7 **Q And you saw them in the kitchen?**
 8 A In the kitchen area. I mean, you have to
 9 understand there's like three parts to that kitchen.
 10 So it's very large.
 11 **Q All right. What part did you see John in?**
 12 A In the corner, left hand. And Mary was in
 13 the same vicinity but not right next to him. They
 14 weren't chatting.
 15 **Q What is also contained in the corner, left**
 16 **hand of the room?**
 17 A There's like a -- like shelves with -- I
 18 don't know. Just shelves that I remember, you know,
 19 open door pantry stuff.
 20 **Q What was Ms. Maxwell wearing when you**
 21 **arrived at the home?**
 22 A I don't remember what she was wearing.
 23 **Q The book that you were reading at the spa**
 24 **that day, do you recall the name of it?**
 25 A No. I just know it was -- it said the

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1 word massage on the front of it. I don't know the
 2 title or the author.
 3 **Q Do you know the color of the book?**
 4 A It was -- it was dark. It was a, like
 5 plastic covering.
 6 **Q All right. And how big was it, if you can**
 7 **just demonstrate for the video?**
 8 A Smaller than that. Maybe -- I don't --
 9 maybe a little bit less than that.
 10 **Q Can you hold it sideways for the video?**
 11 A (Complied.)
 12 **Q So you're saying the book size was a**
 13 **little bit less than half of --**
 14 A Right. I mean, the book was a little bit
 15 bigger. The pages were -- you know, this is very
 16 small print. This is printed A4 longways, whereas, I
 17 think. It wasn't A4 that way. I don't know. It was
 18 just a book. And I don't know how many pages it had
 19 either. I mean, approximately, maybe 100 pages.
 20 **Q Okay. So maybe my question wasn't a very**
 21 **good question.**
 22 **How big was the outside of the book, not**
 23 **the thickness, but the length and the width?**
 24 A Maybe like here (indicating).
 25 **Q So a little bit bigger?**

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1 A Longer than this, yeah. We're going to
 2 fold it in half again, and then like that
 3 (indicating).
 4 **Q So larger than an 8 and a half and**
 5 **11 piece of paper?**
 6 MR. EDWARDS: Form.
 7 A I don't know what 8 and a half and
 8 11 inches is. If this is 8 and a half and 11 inches,
 9 then yes. It's (indicating).
 10 **Q (BY MS. MENNINGER) So when you fold it in**
 11 **half, is that a little bit smaller, folded in half,**
 12 **than the book --**
 13 A Yeah, if I were going to hold the book
 14 like this, if I were going to sit there and read the
 15 book like this, in my mind it would be a little bit
 16 bigger than what I'm holding right here.
 17 **Q All right. So you're demonstrating the**
 18 **book as it's opened that way?**
 19 A Yeah, let's just say I'm reading it like
 20 this.
 21 **Q Okay. Got it.**
 22 MS. MENNINGER: I'm going to suggest we
 23 take a short break. We can --
 24 MR. EDWARDS: Order --
 25 MS. MENNINGER: -- order lunch for you

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1 guys and then do a little bit more before the lunch
 2 gets here --
 3 MR. EDWARDS: Okay.
 4 MS. MENNINGER: -- if that works for
 5 everybody.
 6 MR. EDWARDS: Yeah, that's great.
 7 MS. MENNINGER: All right. Let's do that.
 8 THE VIDEOGRAPHER: We're off the record at
 9 11:38.
 10 (Recess taken from 11:38 a.m. to
 11 11:57 a.m.)
 12 THE VIDEOGRAPHER: We're back on the
 13 record at 11:57.
 14 **Q (BY MS. MENNINGER) How long were you at**
 15 **the El Brillo home on that first day you went?**
 16 A Over two hours.
 17 **Q Okay. And who took you home?**
 18 A Juan Alessi.
 19 **Q And what car was he driving?**
 20 A I believe it was a black Suburban.
 21 **Q Did anyone else ride in the car with you?**
 22 A Just Juan.
 23 **Q What time approximately did you get home?**
 24 A 8:30, approximately.
 25 **Q Was it dark?**

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1 A Yes.
 2 **Q Who else was at home when you got home?**
 3 A My mom, my dad and my brother.
 4 **Q Which brother?**
 5 A Sky.
 6 **Q And anyone else who was there at the time?**
 7 A I believe Michael might have been living
 8 with me at that time. So he might have been there.
 9 **Q Do you recall if he was there when you got**
 10 **home?**
 11 A I don't really remember. I remember what
 12 I did when I got home, that I basically made a
 13 beeline for the bathroom.
 14 **Q Let me ask you a question. Michael was**
 15 **living with you at that home, at your parents' home**
 16 **at the time, is your best recollection today; is that**
 17 **right?**
 18 A That's my best recollection, yes.
 19 **Q When you say living with you, were you**
 20 **guys staying in the same room?**
 21 A Yes.
 22 **Q Were you engaged at that time to him?**
 23 A That was a really weird relationship. He
 24 was a friend who looked after me, and he did propose
 25 to me and I did say yes. But my heart was never in

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1 it.
 2 He was somebody that helped me off the
 3 streets so I felt compelled to say yes to him.
 4 **Q Okay. So when he proposed to you and you**
 5 **said yes, did that take place before you started**
 6 **working at Mar-a-Lago or after you started working at**
 7 **Mar-a-Lago?**
 8 A Before.
 9 **Q And so if he were living with your parents**
 10 **at that time, you were living in the same room; is**
 11 **that correct?**
 12 A I believe so.
 13 **Q And your parents understood him to be your**
 14 **fiancee?**
 15 A I don't think they agreed with it, but I
 16 think they understood it as that. I mean --
 17 **Q I mean, you communicated to them that he**
 18 **had proposed and you had accepted?**
 19 A Yeah, in not such a pretty way. I mean,
 20 they obviously weren't very happy about it. And it
 21 wasn't my true intentions to ever marry him.
 22 **Q Okay.**
 23 A But I did it to make him feel okay. I
 24 didn't want to be mean.
 25 **Q What did your mom say about your**

1 **engagement to [REDACTED]**
 2 A Oh, they never thought it was going to go
 3 forward either.
 4 **Q When you got home, you said you made a**
 5 **beeline for the bathroom?**
 6 A Correct.
 7 **Q And what did you do in the bathroom?**
 8 A I showered.
 9 **Q Okay. Did you have a conversation with**
 10 **anyone prior to going to the bathroom?**
 11 A My mom came into the bathroom and -- and
 12 she, you know, she asked me how it went. And I told
 13 her I'd rather not talk about it. And she didn't
 14 push me any further for any more conversation.
 15 **Q Okay. And then she left the bathroom?**
 16 A She left the bathroom.
 17 **Q Did anyone overhear that conversation?**
 18 A No, the door was closed.
 19 **Q Was your dad at home?**
 20 A Yes.
 21 **Q Did you have a conversation with your dad**
 22 **that night?**
 23 A Not that I remember, no.
 24 **Q And did you have any other conversation**
 25 **with your mother that night?**

1 **physical features of Ghislaine Maxwell?**
 2 A I can tell you that she had very large
 3 natural breasts. I can tell you that her pubic hair
 4 was dark brown, nearly black. I don't remember any
 5 specific birthmarks or moles that I could point out
 6 that would be relevant.
 7 **Q Any scar?**
 8 A I don't remember any scars.
 9 **Q Any tattoos?**
 10 A No tattoos.
 11 **Q When did you next go to the El Brillo**
 12 **house?**
 13 A I believe it would have been the next day.
 14 **Q You believe it would have been or was it?**
 15 MR. EDWARDS: Form.
 16 A I know that it was consecutive, that I
 17 continued to go there after my first -- the first
 18 time that the abuse took place there. It was
 19 consecutive that I was there, I believe, over the
 20 next course of weeks.
 21 **Q (BY MS. MENNINGER) What day of the week**
 22 **was the first time you went?**
 23 A I don't know.
 24 **Q Do you know whether you went the very next**
 25 **day or not?**

1 A No.
 2 **Q Did you have any conversation with your**
 3 **brother that night?**
 4 A No. He's -- he's five years younger than
 5 me. It's not something I'd talk to him about.
 6 **Q And did you have any conversation with**
 7 **[REDACTED] that night?**
 8 A I could have. I don't remember having
 9 one, but I could have.
 10 **Q Did you call any of your friends that**
 11 **night?**
 12 A No.
 13 **Q Who were your good friends at that time?**
 14 A [REDACTED] (phonetic). That was
 15 really it. I didn't really have many friends. I
 16 kept to myself a lot.
 17 **Q Did you call [REDACTED] that night?**
 18 A I don't think [REDACTED] and I were -- we were
 19 on and off friends from middle school. And no reason
 20 on and off like we had an argument or something. We
 21 just got out of touch.
 22 **Q Um-hum.**
 23 A So, no, at that time I don't think I was
 24 talking to him.
 25 **Q Are you aware of any distinguishing**

1 A I believe I did.
 2 **Q All right. How did you get there the very**
 3 **next day?**
 4 MR. EDWARDS: Form.
 5 A I believe my dad dropped me off again.
 6 **Q (BY MS. MENNINGER) When you say you**
 7 **believe, do you recall him doing that or are you**
 8 **guessing?**
 9 A I don't -- well, this is how I figure
 10 this. I don't remember Ghislaine picking me up from
 11 Mar-a-Lago. I didn't have my own car. So the only
 12 way I could have really gotten there would have been
 13 my dad picking me up -- I mean, sorry, dropping me
 14 off.
 15 **Q Do you have a distinct recollection of**
 16 **your father dropping you off there more than one day**
 17 **in a row?**
 18 A Yes.
 19 **Q You do not recall the car he was driving?**
 20 A Like I said, he always drove trucks.
 21 That's as good as I can get.
 22 **Q And so -- and you worked on weekends as**
 23 **well at Mar-a-Lago or no?**
 24 A No.
 25 **Q So the second day would have had to be**

1 **another weekday or was it on a weekend?**
 2 MR. EDWARDS: Form.
 3 A I don't know.
 4 **Q (BY MS. MENNINGER) Do you know if you**
 5 **went after work at Mar-a-Lago?**
 6 A Yes.
 7 **Q So you went to work the very next day at**
 8 **Mar-a-Lago?**
 9 A Yes.
 10 **Q Did you have a conversation with anyone at**
 11 **Mar-a-Lago about the day before at El Brillo?**
 12 A No.
 13 **Q You didn't talk to any of your coworkers**
 14 **about it?**
 15 A No.
 16 **Q Who was your boss at the time?**
 17 A No.
 18 **Q Did you have a boss at the time?**
 19 A I think Adriana or Adrienne. I don't
 20 remember the exact pronunciation of her name, but
 21 it's along those lines. I believe she was my boss.
 22 **Q And you did not talk to her about it?**
 23 A No.
 24 **Q You surmise that your father dropped you**
 25 **off because you can't think of another way you would**

1 **have gotten there, correct?**
 2 A Correct.
 3 **Q And when you came the second day, did your**
 4 **father come to the door?**
 5 A I don't think he came to the door that
 6 time. I think I was just dropped off.
 7 **Q All right. And what did you do when you**
 8 **got there?**
 9 A Knocked on the door and --
 10 **Q Who answered the door?**
 11 A Juan Alessi.
 12 **Q Okay. Was anyone else there besides Juan**
 13 **Alessi?**
 14 A Jeffrey, Ghislaine and [REDACTED].
 15 **Q Okay. And where did you see [REDACTED] ?**
 16 A She was downstairs.
 17 **Q Did you speak to her?**
 18 A Just introductions.
 19 **Q Tell me what you mean by introductions.**
 20 A My name is Virginia. Nice to meet you.
 21 Her name, she introduced herself as [REDACTED] And she
 22 told me she was Ghislaine's personal assistant.
 23 **Q Did you call yourself Virginia at the**
 24 **time?**
 25 A No, I think I've gone by Jenna for a long

1 time.
 2 **Q So did you introduce yourself as Virginia**
 3 **or as Jenna?**
 4 A Most likely Jenna.
 5 **Q Do you recall this or is this something**
 6 **that you're guessing about?**
 7 A Well, considering that everybody knew me
 8 as Jenna, I think I would have introduced myself as
 9 Jenna.
 10 **Q You don't recall it?**
 11 MR. EDWARDS: Form.
 12 A I don't recall the exact answer to that,
 13 no, but just knowing I had everybody pretty much call
 14 me Jenna.
 15 **Q (BY MS. MENNINGER) I'm just trying to**
 16 **make a clear record about what you do remember and**
 17 **what you're guessing about. So when you say I think**
 18 **I would have, it leads me to believe you don't recall**
 19 **it.**
 20 **If you mean something different by that --**
 21 A I --
 22 **Q -- please feel free to clarify. I'm just**
 23 **trying to explain to you what I'm asking.**
 24 A Yes. And I'm doing the very best that I
 25 can tell you exactly what it is. But it's just hard

1 for me to remember so long ago. And knowing that I
 2 introduced myself as Jenna to everybody leads me to
 3 assume that I would have introduced myself to them as
 4 Jenna as well.
 5 **Q All right. But if we were to speak to**
 6 **[REDACTED], she might have a different recollection,**
 7 **fair to say?**
 8 MR. EDWARDS: Form.
 9 A She could.
 10 **Q (BY MS. MENNINGER) How is it that you**
 11 **knew to come there on this second day?**
 12 A I was asked to come back.
 13 **Q When were you asked to come back?**
 14 A The day before, after the encounter they
 15 told me to come back at the same time after work.
 16 **Q Who is they?**
 17 A Jeffrey and Ghislaine.
 18 **Q Okay. Did they both simultaneously say**
 19 **that or did one of them say it?**
 20 A It was like a conversation that they both
 21 had with me separately. Jeffrey told me upstairs
 22 after the whole entire abuse had happened that he
 23 really liked me and he'd like me to come back.
 24 When I went downstairs --
 25 **Q Let me just stop you there. Did he say, I**

1 **want you to come back tomorrow?**
 2 A Yes.
 3 **Q Okay. Did he tell you what time tomorrow**
 4 **he wanted you to come back?**
 5 A No, he just said he wants me to come back
 6 tomorrow.
 7 **Q Okay. And then you went downstairs and**
 8 **what happened?**
 9 A Ghislaine told me I did a really good job
 10 and she wants me to come back tomorrow after work.
 11 **Q That's what she said, I want you to come**
 12 **back tomorrow after work?**
 13 A Yes.
 14 **Q You recall those words being used by her?**
 15 A Yes.
 16 **Q Did you ask them for a ride to get there**
 17 **the next day?**
 18 A No.
 19 **Q You just said, I'll come back tomorrow.**
 20 A Yeah. I agreed to come back the next day.
 21 **Q How did you agree?**
 22 A Verbally.
 23 **Q Okay. Was anyone else present when**
 24 **Ghislaine said that to you and you responded, I'll**
 25 **come back tomorrow?**

1 A I believe Juan Alessi was pretty much
 2 within ear distance.
 3 **Q Could you see him?**
 4 A Yes.
 5 **Q Okay.**
 6 A Like I said, in ear distance, when I mean
 7 ear distance like hearing, in the hearing vicinity.
 8 And it was in the same time that she was asking him
 9 to drop me off at home.
 10 **Q Okay. When you were driving home the**
 11 **first night with Juan Alessi, did you have any**
 12 **conversation with him?**
 13 A No. I had told him my address. It was a
 14 very quiet ride.
 15 **Q Did you ride in the front or the back?**
 16 A The front.
 17 **Q It is your contention that, Ghislaine**
 18 **Maxwell had sex with underage girls virtually every**
 19 **day when I was around her, correct?**
 20 A Yes.
 21 **Q All right. With whom did Ghislaine**
 22 **Maxwell have sex in your presence?**
 23 A Well, there's a lot of girls that were
 24 involved. We weren't on a first name basis with each
 25 other. I wouldn't be able to give you lists of names

1 of girls. It was continuous.
 2 **Q It was continuous. Name one girl that**
 3 **Ghislaine Maxwell had sex with in your presence.**
 4 A Emmy Taylor. I mean, that's a name that I
 5 know well because Emmy was always around.
 6 I'm trying to think of her name, sorry.
 7 Sarah. Her name used to be Sarah Kellen. I think
 8 she's changed it now that she's married.
 9 [REDACTED] (phonetic) -- I can't
 10 pronounce her last name properly, but it's around
 11 those lines.
 12 There were a lot of other girls that I
 13 honestly can't remember their names. I'm sorry. I
 14 wish I could help out more because I really would
 15 like to provide more witnesses for this, but I can't
 16 remember a lot of girls' names.
 17 **Q So those are the three names of females**
 18 **that you observed Ghislaine Maxwell have sex with --**
 19 **MR. EDWARDS: Object to the form.**
 20 **Mischaracterizes testimony.**
 21 **Q (BY MS. MENNINGER) -- is that what I**
 22 **understand your answer to be?**
 23 **MR. EDWARDS: Objection. Mischaracterizes**
 24 **her testimony.**
 25 A Those are -- those are some three of the

1 names that I know very well. Like I said, there was
 2 a lot more.
 3 **Q (BY MS. MENNINGER) Okay. Do you know the**
 4 **names of any other girl that you personally observed**
 5 **Ghislaine Maxwell have sex with?**
 6 A Do you mind me taking a minute to just try
 7 to reflect?
 8 **Q No.**
 9 A Um, her name is on the tip of my tongue.
 10 Her last name is [REDACTED] I don't remember her
 11 first name off the top of my head. I normally could
 12 remember it.
 13 **Q Okay.**
 14 A There's just a blur of so many girls.
 15 It's really hard for me to remember. And you have to
 16 understand we weren't introduced to each other on a
 17 first name basis half the time. A lot of these girls
 18 would come and go and you'd never see them again.
 19 So, no, it's very difficult for me to
 20 pinpoint exactly who they were. But those four that
 21 I've given you are 100 percent.
 22 **Q Okay. Did you observe Ghislaine Maxwell**
 23 **forcing any of those four girls to have sexual**
 24 **contact with her?**
 25 **MR. EDWARDS: Form.**

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1 A I don't believe that any of the girls
 2 involved were truly willing participants doing it out
 3 of their own wanting. I believe we were all there
 4 for one purpose, and that was to keep Jeffrey and
 5 Ghislaine happy and to do our jobs, which was giving
 6 them erotic massages and keeping them pleased
 7 sexually.

8 **Q (BY MS. MENNINGER) Okay. Do you know**
 9 **what the word force means, physical force?**

10 A If you mean like held down or a gun put to
 11 the head, then no.

12 **Q Okay.**

13 A But force in a word -- like a way of
 14 coercion. There was definitely indirect threats that
 15 you knew these people were powerful. They had a lot
 16 of contacts. They were very wealthy. They were
 17 people you did not want to cross lines with on a bad
 18 way.

19 **Q Okay. What threats did you hear Ghislaine**
 20 **Maxwell state to you?**

21 A Just the reminders of the prominent people
 22 that she knows personally.

23 **Q When did Ghislaine Maxwell remind you**
 24 **about the prominent people that she knows personally?**

25 A It was on a constant basis. I mean, there

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1 was no just one time that she said it. It was like a
 2 reminder, you know. And Jeffrey did a lot more of
 3 that than she did. But she definitely made it aware
 4 that we shouldn't cross boundaries with them.

5 **Q Or what would happen?**

6 A Like I said, it was more of an indirect
 7 threat. And it doesn't take an intellect to figure
 8 out what they mean when they say that they're
 9 powerful people and they're very wealthy and they
 10 know a lot of people.

11 **Q I need you to be very clear. You just**
 12 **used the word "they." I've asked you about Ghislaine**
 13 **Maxwell.**

14 A Okay.

15 **Q So I just want to make sure you understand**
 16 **the question.**

17 A Correct.

18 **Q Because I don't want to have you, you**
 19 **know, misunderstand the question.**

20 A Correct.

21 **Q So I'm asking you, what did Ghislaine**
 22 **Maxwell say would happen in regards to crossing a**
 23 **line with respect to her knowledge of famous people?**

24 A In a --
 25 MR. EDWARDS: Object to the form.

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1 Mischaracterizes her testimony.
 2 You can answer.

3 A You wouldn't want to piss us off. You
 4 wouldn't want to piss me and Jeffrey off. I mean
 5 that's one way of saying it. Other than --

6 **Q (BY MS. MENNINGER) Did she say, I don't**
 7 **want -- you would not want to piss me off?**

8 A Piss me off is probably my word, using
 9 piss, but it was along those lines. I don't remember
 10 the exact word that she used.

11 **Q And do you remember a specific occasion on**
 12 **which she said that to you?**

13 A I remember very early on.

14 **Q Where were you?**

15 A I believe it was during my, what I call
 16 the training period with Jeffrey and Ghislaine.

17 **Q Okay. And where were you?**

18 A For a specific -- and like I said, it
 19 happened a lot. But for one specific, I remember
 20 being out on the balcony in the house at El Brillo,
 21 sitting outside with her. This is when I thought
 22 that -- I didn't know that I worked for Jeffrey
 23 immediately. I thought I worked for Ghislaine
 24 because she was the one who brought me in. And she
 25 was the one offering the majority of the training to

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1 me.
 2 So, yeah, it was on the balcony, outside,
 3 I believe the yellow room.

4 **Q She said, You would not want to piss me**
 5 **off because I know powerful people, or words to that**
 6 **effect?**

7 A Words to that effect, yes.

8 **Q And did she say what would happen if you**
 9 **pissed her off because she knows powerful people?**

10 A That statement alone was enough to let me
 11 know. I was scared and I didn't want to -- I didn't
 12 want to push any further into that question. I
 13 seemed like I would obey.

14 **Q Up until that point in your life, had you**
 15 **met any powerful people?**

16 MR. EDWARDS: Form.

17 A I do believe that I've been put in very
 18 dangerous situations, being a runaway and having a
 19 lot of bad things happen to me. Understanding the
 20 word powerful people and things that could happen,
 21 I've put two and two together and knew what she
 22 meant.

23 **Q (BY MS. MENNINGER) Okay. So you had met**
 24 **powerful people before the day that Ghislaine Maxwell**
 25 **said this to you; is that your testimony?**

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1 A Nowhere near as powerful as Jeffrey and
 2 Ghislaine, nowhere near. But people that did scare
 3 me, yes.
 4 **Q Okay. And you had met those people at
 5 what age?**
 6 A I don't know what age I was. I'm sorry.
 7 I was young. I was -- before I met Jeffrey and
 8 Ghislaine.
 9 **Q Is there any girl who you personally
 10 observed to have sexual contact with Ghislaine
 11 Maxwell when she was under the age of 18?**
 12 A It's very hard to tell how many girls were
 13 under the age of 18. My instruction from them was
 14 the younger the better.
 15 **Q And, again, them, who told you that?**
 16 A Them, both of them. They both --
 17 Ghislaine did the majority of my training in the
 18 beginning. Jeffrey also insinuated and told me lots
 19 of things as well.
 20 **Q Okay. So you don't know the age of any
 21 other female that you saw have sexual contact with
 22 Ghislaine Maxwell --**
 23 MR. EDWARDS: Object --
 24 **Q (BY MS. MENNINGER) -- is that true?**
 25 MR. EDWARDS: Object to the form of the

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1 question. Mischaracterized her testimony. She
 2 wasn't finished with her answer.
 3 MS. MENNINGER: I wasn't finished with my
 4 question when you objected. And at the end of my
 5 question I said, "Is that true?" She can now restate
 6 it without you suggesting to her the answer.
 7 MR. EDWARDS: I have no idea what the
 8 question is to even object to at this point.
 9 Do you know the question?
 10 A Do I know any underage girls that
 11 Ghislaine slept with.
 12 MS. MENNINGER: Can you please read back
 13 the question?
 14 (Record read as requested.)
 15 MR. EDWARDS: Hold on. She wasn't
 16 finished with her question, she told me. So that's
 17 not the finished question.
 18 MS. MENNINGER: You interrupted it. I
 19 finished my question. She just read it to her.
 20 **Q (BY MS. MENNINGER) Can you please answer
 21 the question?**
 22 MR. EDWARDS: Then I object to that
 23 question as a mischaracterization of her testimony.
 24 And she wasn't finished with her answer.
 25 A It is impossible for me to know the ages

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1 of all the girls that were sent to Jeffrey and
 2 Ghislaine. That is my answer.
 3 **Q (BY MS. MENNINGER) I did not ask you
 4 about the girls who were sent to Jeffrey and
 5 Ghislaine. I asked you about any girl that you
 6 personally saw have sexual contact with Ghislaine
 7 Maxwell.**
 8 **Do you understand that question?**
 9 A Do I know the ages of them?
 10 **Q Do you know the age of any girl that you
 11 saw have sexual contact with Ghislaine Maxwell?**
 12 A Well, for instance, I mean, [REDACTED]
 13 was, I think, a year older than me. That's one way
 14 of putting it. [REDACTED] I think was like a few years
 15 older than me. [REDACTED] again, a few years older
 16 than me. I mean, those are the girls that I can
 17 actually name.
 18 Without, not knowing the other girls'
 19 names, there's no way for me to identify what age
 20 they actually were.
 21 **Q Okay. Describe for me any other girl
 22 other than the ones that you've named who you say you
 23 saw have sexual contact with Ghislaine Maxwell with
 24 your own two eyes.**
 25 A There's so many I don't know where you

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1 want me to start. I find it impossible to answer
 2 that question with the amount of girls that I have
 3 witnessed. And without being able to give you
 4 specific names, I don't think I'm able to answer that
 5 question.
 6 **Q Okay. I asked you to describe them, so
 7 you could give me a height, a hair color, anything
 8 else that comes to mind?**
 9 A There were blondes, there were brunettes,
 10 there were redheads. They were all beautiful girls.
 11 I would say the ages ranged between 15 and 21.
 12 **Q And why do you believe the ages ranged
 13 from 15 to 21?**
 14 A Some of them looked really young. Some of
 15 them, I wouldn't say 21 looks old or anything like
 16 that, but it's hard to gauge another person's age
 17 without really asking them. But some of them looked
 18 younger than me and some of them looked older than
 19 me.
 20 **Q And in what physical locations did you see
 21 Ghislaine Maxwell have sexual contact with any girl?**
 22 A 100 percent, the U.S. V.I.
 23 **Q Where?**
 24 A Jeffrey's island.
 25 **Q Where?**

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1 A In cabanas. Do you know what I mean by
 2 cabana?
 3 **Q I do, thank you.**
 4 A In cabanas, in Jeffrey's room.
 5 **Q Describe Jeffrey's room on U.S. V.I. for**
 6 **me.**
 7 A So can I use this as an idea? Like if
 8 this is the island -- can I do that?
 9 **Q I'm asking you to describe the inside of a**
 10 **room.**
 11 A Oh, the inside of a room. I thought you
 12 meant located.
 13 **Q Um-hum.**
 14 A Okay. Large, stony. He had a king size
 15 bed with posts on it. There was a large door, I
 16 think it's called a door, where you put your clothes.
 17 There was an adjacent bathroom with a more stony
 18 look, giant tub.
 19 **Q What color was the paint on the wall?**
 20 A It was stone.
 21 **Q What color was the bedspread?**
 22 A White.
 23 **Q What color were the sheets?**
 24 A White.
 25 **Q And you saw Ghislaine Maxwell have sexual**

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1 **contact with an unknown, unnamed female in that room,**
 2 **correct?**
 3 A Absolutely.
 4 **Q All right. When were you there that you**
 5 **saw this happen?**
 6 A This happened on so many occasions. The
 7 island was a place where orgies were a constant thing
 8 that took place. And again, it's impossible to know
 9 how many. And, like I said, it wasn't just Jeffrey's
 10 room. It was outside and, you know. It was --
 11 **Q When you were outside did you see**
 12 **Ghislaine Maxwell have sexual contact with a female?**
 13 A When you say sexual contact does that mean
 14 fornicating or down to taking explicit photos or
 15 what -- can you define what you mean by sexual
 16 contact?
 17 **Q Sure. It generally, in my mind, means**
 18 **placing either mouth or intimate parts or hands on**
 19 **the breasts, buttocks, or pubic area of another**
 20 **person for sexual gratification.**
 21 A Sure.
 22 **Q Did you see Ghislaine Maxwell have sexual**
 23 **contact with a woman outside on the U.S. Virgin**
 24 **Islands?**
 25 A I would say a female. I wouldn't define

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1 them as a woman. A woman is someone who is older.
 2 But, yes, outside by the pool, down by the beach
 3 there's these -- they're little -- I wouldn't call it
 4 a hut. Little tiny wooden room that only could fit a
 5 bed in it.
 6 **Q I'm talking about outside.**
 7 A That's outside.
 8 **Q So let's start with by the pool.**
 9 A Yes.
 10 **Q Is that a different occasion than the hut?**
 11 A I'm talking about many occasions.
 12 **Q Okay.**
 13 A Over time.
 14 **Q Let's just talk about the ones that you**
 15 **saw happen outside, out of doors.**
 16 A Okay.
 17 **Q Okay?**
 18 A Yeah.
 19 **Q Do you recall any such specific occasion**
 20 **or is it just a big blur in your mind?**
 21 A No, I mean, one occasion stands out.
 22 Models were -- I think they were models -- were flown
 23 in. There were orgies held outside by the pool.
 24 That's one occasion.
 25 **Q All right. Let's stick with that**

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1 **occasion.**
 2 A Okay.
 3 **Q What sexual contact did you observe**
 4 **Ghislaine Maxwell have with a female by the pool at**
 5 **an orgy on the U.S. Virgin Islands?**
 6 A Well, there was quite a few girls and it
 7 was -- excuse me, if I'm saying this in an inexplicit
 8 way, but I don't know how else to say it. So if you
 9 don't understand, please let me know -- girl-on-girl
 10 action. So there was a lot of -- what's the word for
 11 it? Licking, licking vaginas, breasts.
 12 **Q Okay. Which --**
 13 A Fingers being used. She was involved with
 14 that. I remember specifically I had to go down -- do
 15 you know what I mean by go down?
 16 **Q It's your testimony. Go ahead.**
 17 A I had to go down on Ghislaine. Jeffrey
 18 was there as well.
 19 **Q And this is -- we're still by the pool?**
 20 A We're still by the pool with lots of
 21 girls.
 22 **Q Can you name any of those girls that were**
 23 **there?**
 24 A They didn't even speak English. But this
 25 was --

1 **Q Can you describe them physically?**
 2 A Beautiful, tall, some were blonde, some
 3 were sandy brown. They had a foreign tongue.
 4 **Q What -- what language were they speaking?**
 5 A I'm not too sure. It could have been
 6 Russian. It could have been Czechoslovakian. It
 7 could have been -- I think it's between those two, to
 8 be honest. It could have been something else but, I
 9 mean, I don't speak any other language other than
 10 English, so I don't really know.
 11 **Q All right. Any other time you saw**
 12 **Ghislaine Maxwell have sexual contact with another**
 13 **female outdoors in the U.S. Virgin Islands other than**
 14 **this, models with the unknown language?**
 15 A Are we talking about besides with me as
 16 well?
 17 **Q I don't know if you participated. I'm**
 18 **asking if you observed her have sexual contact with**
 19 **another female?**
 20 A Another female other than myself?
 21 **Q You can answer it however you want.**
 22 A Well, and the list keeps going on.
 23 Ghislaine and I and Jeffrey and [REDACTED]
 24 participated in, I guess what you would call a
 25 foursome in the living room in the main house.

1 **Q Okay. I was asking about outdoors.**
 2 **Sorry.**
 3 A Oh. Well, I don't know if you'd consider
 4 this outdoors, but on the beach where those -- it's
 5 basically an outdoor setting. It's like a little
 6 wooden house. It's not a house, only a bed can fit
 7 in there. It's right on the beach. It's open.
 8 **Q Um-hum.**
 9 A Would you consider that outdoors?
 10 **Q I have never been there. So I don't know**
 11 **whether it's outdoors or not.**
 12 A I would consider it outdoors. And --
 13 **Q How old were you at that time?**
 14 A I don't know.
 15 **Q Okay.**
 16 A I have no idea. Again, Ghislaine, myself,
 17 Jeffrey, another girl in this blue, outdoor -- I
 18 don't know what you want to call it. Cabana, that a
 19 house -- just a bed could fit in.
 20 **Q How many times did you visit the island?**
 21 A I wouldn't be able to say. Lots of times.
 22 **Q More than five?**
 23 A Definitely more than five.
 24 **Q More than ten?**
 25 A More than ten.

1 **Q More than 20?**
 2 A I would say more than 20.
 3 **Q More than 50?**
 4 A I don't think more than 50, but --
 5 **Q Did --**
 6 A I don't have an exact number. I mean,
 7 if -- I think if you look at the flight logs, you
 8 know, that helps, but then they're not fully
 9 complete. We only have flight logs to one plane and
 10 then there's a time I was flown commercially into the
 11 island.
 12 **Q Um-hum.**
 13 A So it's really hard for me to gauge a
 14 number.
 15 **Q Okay. Do you have any photographs of**
 16 **yourself on the island?**
 17 A I know I used to, but they would be left
 18 in that apartment.
 19 **Q What other locations did you participate**
 20 **in sexual contact with Ghislaine Maxwell, other than**
 21 **the island?**
 22 A Everywhere. New York, Palm Beach.
 23 **Q Where in New York?**
 24 A The mansion, Jeffrey's mansion.
 25 **Q Okay. Anywhere else in New York?**

1 A Not at her townhouse.
 2 **Q Anywhere else in New York?**
 3 A No.
 4 **Q In Palm Beach?**
 5 A At the house in Palm Beach.
 6 **Q Anywhere else in Palm Beach?**
 7 A No.
 8 **Q In New Mexico?**
 9 A The house in New Mexico.
 10 **Q Anywhere else in New Mexico?**
 11 A No.
 12 **Q What other countries?**
 13 A France, uhm, England. Um -- we also -- I
 14 mean, if we're going to talk about other countries
 15 we've got to talk about international travel space or
 16 plane space or whatever you want to call it because
 17 it happened all the time on the planes.
 18 **Q Okay.**
 19 A Going from different country to country.
 20 **Q Where in France did you have sexual**
 21 **contact with Ghislaine Maxwell?**
 22 A There's a couple places in France that we
 23 used to go to.
 24 **Q When you say you used to go to, how many**
 25 **times did you go to France?**

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1 A I think I've been to France three times.

2 **Q All right. How old were you when you went**

3 **to France?**

4 A I don't know.

5 **Q Did you have a passport when you went to**

6 **France?**

7 A I would have had to, yes.

8 **Q You did have a passport when you went to**

9 **France?**

10 A Yes.

11 **Q And you went to France three times, you**

12 **believe?**

13 A Yes.

14 **Q And when you were in France those three**

15 **times, how many of those three times did you have**

16 **sexual contact with Ghislaine Maxwell?**

17 A Every time.

18 **Q And in what locations in France did you**

19 **have sexual contact with Ghislaine Maxwell?**

20 A The first time that I remember, we stayed

21 at a really fancy hotel.

22 **Q In what city?**

23 A Paris.

24 **Q Okay.**

25 A And it was within the view of the Champs-

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1 Elysees.

2 **Q Did you have your own room or a separate**

3 **room?**

4 A We all stayed in the same room, but that

5 room had adjoining rooms to it. So, you know, one

6 hotel room but with different rooms in it.

7 **Q Okay. And anywhere else on that one trip**

8 **that you went?**

9 A She brought in a redheaded French girl.

10 She walked up to her in Paris and, you know --

11 **Q In your presence?**

12 A In my presence.

13 **Q Um-hum.**

14 A And she walked up to this French girl to

15 show me how easy it was for her to procure girls. I

16 wasn't very good at it. And, you know, it was part

17 of my training was to bring in other girls. So she

18 walked up to her. Within five minutes she had her

19 number and that girl came over later that night to

20 the hotel and serviced Jeffrey. I didn't see

21 Ghislaine with her. I just know she told me what

22 happened and Jeffrey told me what happened.

23 **Q So you were not there?**

24 A I did not see it.

25 **Q Okay. When did you have sexual contact**

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1 **with Ghislaine Maxwell at this hotel room overlooking**

2 **the Champs-Elysees?**

3 A Before she picked up the redhead.

4 **Q And was that just you and Ghislaine or was**

5 **anyone else a participant in that?**

6 A Jeffrey and [REDACTED]

7 **Q And where else in France did you have**

8 **sexual contact with Ghislaine Maxwell?**

9 A The south of France.

10 **Q Where?**

11 A I wouldn't call it so much a hotel. I

12 don't know what you'd call it. It had like big

13 townhouse kind of things that you could rent out.

14 **Q Was this on the same trip or a different**

15 **trip?**

16 A Different trip.

17 **Q Okay. Who else was present for that?**

18 A Well, we were going to [REDACTED]

19 birthday party. It wasn't at the birthday party.

20 **Q Right.**

21 A It was before the birthday party.

22 **Q Oh, you had sexual contact with Ghislaine**

23 **Maxwell before you went to [REDACTED] birthday**

24 **party?**

25 MR. EDWARDS: Form.

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1 A That's correct.

2 **Q (BY MS. MENNINGER) And who else was**

3 **present during your supposed sexual contact with**

4 **Ghislaine Maxwell on this occasion?**

5 MR. EDWARDS: Object to the form of the

6 question.

7 A It wasn't supposed. It actually happened.

8 And Ghislaine was present, Jeffrey was present. I

9 believe [REDACTED] was present as well.

10 **Q (BY MS. MENNINGER) Anyone else?**

11 A There was someone else on that trip with

12 us, but they weren't involved with the sexual

13 activity at that time.

14 **Q Okay. And what was the other location in**

15 **France?**

16 A I believe the same exact place. I mean,

17 we stayed there for a few days.

18 **Q Okay. So the three locations are hotel in**

19 **Paris, same place, same place?**

20 A Correct.

21 **Q And the second and third same places were**

22 **on the same trip?**

23 A Same trip.

24 **Q Okay. And then you had a third trip to**

25 **France where you did not have sexual contact with**

1 **Ghislaine Maxwell?**
 2 MR. EDWARDS: Form.
 3 A I believe -- it's hard for me to remember.
 4 I remember going to quite a few different countries
 5 on that trip. I don't know if it was -- I don't know
 6 if we did it in Paris or not, to be honest. We did
 7 it in other places. But I've been to Paris three
 8 times -- or not Paris, sorry, France.
 9 **Q (BY MS. MENNINGER) Okay. All right.**
 10 **When did you first tell your parents that you would**
 11 **be traveling with Jeffrey Epstein?**
 12 A I'm not too sure when I actually told
 13 them.
 14 **Q How long after you were working with**
 15 **Jeffrey Epstein did you travel with him?**
 16 A Well, I know my first trip was to New
 17 York. I would say anywhere between six weeks -- I
 18 would say after six weeks.
 19 **Q You were -- you had known Jeffrey Epstein**
 20 **for six weeks before you started traveling with**
 21 **him --**
 22 A I believe.
 23 **Q -- am I understanding that correct?**
 24 A I believe so. I mean, that's an
 25 approximate answer.

1 **Q And your first trip was to New York?**
 2 A Yes.
 3 **Q And did you just go to New York and come**
 4 **back or did you go somewhere else?**
 5 A I think I just went to New York, but I
 6 can't remember if we went somewhere else.
 7 **Q Okay. And did you tell your parents you**
 8 **were going to New York?**
 9 A Yes.
 10 **Q And do you recall any part of your**
 11 **conversation with your parents about going to New**
 12 **York?**
 13 A I didn't get into details about what I was
 14 having to do with Ghislaine and Jeffrey. I didn't
 15 tell them that, but I told them I was going to New
 16 York.
 17 **Q And you don't recall telling them anything**
 18 **else about it?**
 19 A I don't know. I mean, I might have called
 20 them from New York and told them it was cold and, you
 21 know, just simple stuff. But I can't really recall
 22 what I spoke to them about.
 23 MS. MENNINGER: As I understand it, the
 24 food is here. So I'm going to suggest that now is a
 25 good time to take a break.

1 MR. EDWARDS: Sounds good.
 2 MS. MENNINGER: All right.
 3 THE VIDEOGRAPHER: We're off the record at
 4 12:42.
 5 (Recess taken from 12:42 p.m. to
 6 1:21 p.m.)
 7 THE VIDEOGRAPHER: We're back on the
 8 record at 1:21.
 9 **Q (BY MS. MENNINGER) All right.**
 10 **Ms. Giuffre, I want to talk to you about where you**
 11 **were living in the late '90s. Do you recall -- you**
 12 **testified earlier, I believe, that you were living at**
 13 **your parents' house and you gave us an address at the**
 14 **time you started at Mar-a-Lago.**
 15 A Yes.
 16 **Q Do you remember where you lived previous**
 17 **to living at your parents' house at that time?**
 18 A Like I said, I was a runaway, so there was
 19 a lot of different places I lived. One of the places
 20 I lived was, like I told you earlier, with [REDACTED]
 21 parents. That was somewhere around Fort Lauderdale,
 22 I believe, maybe a little bit outside of it.
 23 **Q Okay.**
 24 A [REDACTED] got an apartment and I lived in
 25 [REDACTED] apartment for a short period.

1 **Q And where do you recall that being?**
 2 A Somewhere in Fort Lauderdale, again.
 3 **Q Okay. And then you were living with your**
 4 **parents or was there another place in between?**
 5 A Then I lived with my parents.
 6 **Q Okay. And then where is the next place**
 7 **that you moved?**
 8 A An apartment that Jeffrey got for me in
 9 Royal Palm Beach.
 10 **Q Okay. And you don't know the address of**
 11 **that?**
 12 A No, I wish I could give it to you. I
 13 don't know it.
 14 **Q And you stayed in that apartment until you**
 15 **left for Thailand in the fall, later in the year in**
 16 **2002, correct?**
 17 A Yes.
 18 **Q Right?**
 19 A Yes.
 20 **Q All right. And when did you first stop**
 21 **living with your parents? How old were you when you**
 22 **first stopped living with your parents?**
 23 MR. EDWARDS: Object to the form.
 24 A The very first time?
 25 **Q (BY MS. MENNINGER) Um-hum.**

1 A I believe I was 11.

2 **Q Okay. What caused you to stop living with**

3 **your parents when you were 11?**

4 A I just had some trouble and my parents

5 thought it would be better if they sent me to

6 California.

7 **Q Okay. What trouble did you have?**

8 A It's very hard for me to talk about.

9 There was stuff that went on in my life that, you

10 know, made me so I -- I couldn't live with my parents

11 anymore.

12 **Q What went on in your life that caused you**

13 **to not be able to live with your parents at the age**

14 **of 11?**

15 A Do I have to answer this?

16 **Q Well, did you talk to Sharon Churcher**

17 **about being molested as a child?**

18 A I did.

19 **Q And you authorized Sharon Churcher to**

20 **publish that in a newspaper, correct?**

21 A I don't think I authorized her to do it.

22 I think she -- I wouldn't say she did it on her own

23 accord. But I talked to her about it and I wasn't

24 aware of exactly what she was going to publish and

25 what she wasn't.

1 **Q So you were able to talk to a reporter for**

2 **the Mail On Sunday about this, correct?**

3 A I did tell her a little bit about my past

4 and where I came from.

5 **Q All right. So what caused you to be sent**

6 **away from your parents' home at the age of 11 to**

7 **California?**

8 A Some of the prior abuse which led me to be

9 a very troubled young teenager. I mean, I guess you

10 wouldn't call 11 a teenager yet, but led me to

11 running away a lot and -- and my family just thought

12 it was best that I get out of the area and move

13 somewhere else.

14 **Q Okay. You had run away prior to being the**

15 **age of 11?**

16 A Yes.

17 **Q All right. Was that reported to the**

18 **authorities?**

19 A That I ran away?

20 **Q Yes.**

21 A Yes.

22 **Q And where were your parents living at the**

23 **age of 11?**

24 A The same address I gave you earlier.

25 **Q Okay. So the authorities associated with**

1 **Loxahatchee, Florida were made aware that you had run**

2 **away from home at the age of 11?**

3 A Yes.

4 **Q And what abuse had you suffered prior to**

5 **the age of 11?**

6 A There was a very close family friend who

7 was a very sick man. And he took advantage.

8 **Q What's his name?**

9 A [REDACTED]

10 **Q [REDACTED] what?**

11 A [REDACTED]

12 **Q And where is [REDACTED] today?**

13 A I don't know where he is.

14 **Q Does anyone in your family keep in contact**

15 **with him?**

16 A No.

17 **Q What did he do to you?**

18 A Um, he touched me places I shouldn't be

19 touched. He sexually abused me.

20 **Q For how long?**

21 A I don't know how long.

22 **Q Did you tell that to your parents?**

23 A They know.

24 **Q How do they know?**

25 A I told them.

1 **Q Did you tell them when you were under the**

2 **age of 11 or at the age of 11?**

3 A I told them later.

4 **Q When did you tell them?**

5 A It took me a long time to forgive my

6 parents for sending me away. I didn't feel like

7 anybody understood me. So not until later in my life

8 did I feel like I was able to talk to anyone about

9 it.

10 **Q Okay. Was it reported to the authorities?**

11 A No. I went too late to talk to anybody

12 about it.

13 **Q Did the event of you being molested cause**

14 **your parents to split up?**

15 A I think Sharon reported that, but I don't

16 think that's the case, no. My parents split up

17 because they were really messed up.

18 **Q Your parents split up because they were**

19 **really messed up?**

20 A Oh, they just didn't get along. There

21 were a lot of marital problems.

22 **Q When did they split up?**

23 A I don't really remember what year it was.

24 **Q How old were you?**

25 A I believe I was living with Jeffrey at the

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1 time.

2 **Q With whom did you live in California?**

3 A My [REDACTED]

4 **Q And who else?**

5 A [REDACTED]

6 **Q And with who else?**

7 A That's it.

8 **Q And for how long did you live with them?**

9 A I don't really know how long, maybe over a

10 year, maybe two years.

11 **Q And then what caused you to not live with**

12 **them anymore?**

13 A I kept running away from them, too.

14 **Q And where did you live in California?**

15 A I'm sorry?

16 **Q Where in California did you live?**

17 A Where did they live?

18 **Q Where did you live with them?**

19 A Salinas.

20 **Q And do you know the address?**

21 A No.

22 **Q Do they still live there?**

23 A No.

24 **Q When did they stop living there?**

25 A I don't know. I haven't kept in contact

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1 with them.

2 **Q And you believe you lived with them for a**

3 **little more than a year?**

4 A Maybe a year, maybe two years. I'm not

5 too sure.

6 **Q Did you go to school there?**

7 A Yes.

8 **Q Where did you go to school?**

9 A Somewhere near Salinas, I'm assuming.

10 **Q What grade were you in?**

11 A Middle school.

12 **Q Sixth grade, seventh grade?**

13 A I think sixth grade.

14 **Q And did you go there for more than one**

15 **year or just one year?**

16 A Maybe -- I don't know. I'm sorry, I don't

17 know.

18 **Q Were the authorities in Salinas alerted to**

19 **the fact that you ran away from home there?**

20 A Yes.

21 **Q How long was the longest you were away**

22 **from home in Salinas, California?**

23 A Two weeks.

24 **Q And you were in middle school?**

25 A (Indicating.)

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1 THE REPORTER: I'm sorry, your --

2 **Q (BY MS. MENNINGER) Yes? Yes or no?**

3 A Oh. Yes.

4 **Q And then when did you go back to Florida?**

5 A I don't know.

6 **Q Was your younger brother living with your**

7 **parents in Florida while you were in California?**

8 A Um-hum, yes.

9 **Q And was your older brother living with**

10 **your parents in Florida while you were in California?**

11 A I don't think so.

12 **Q How much older than you is he?**

13 A Five years.

14 **Q And when you went back to Florida, where**

15 **did you go to school, when you got back?**

16 A I believe I went to Crestwood Middle

17 School.

18 **Q And did you complete your studies at**

19 **Crestwood Middle School?**

20 A Did I get out of middle school there, yes.

21 **Q Okay. What grades were middle school?**

22 A Six, seven and eight.

23 **Q Okay. And when you went back to live with**

24 **your parents again, that was at the same address in**

25 **Loxahatchee?**

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1 A Yes.

2 **Q And you don't believe your older brother**

3 **was in the home at the time?**

4 A No, he was sent to boarding school.

5 **Q Where did he go to boarding school?**

6 A Washington.

7 **Q State or city?**

8 A Washington above California.

9 **Q When was the next time you stopped living**

10 **with your parents?**

11 A They sent me to a group home called

12 Growing Together.

13 **Q Why?**

14 A Because I kept running away.

15 **Q Were the authorities alerted when you ran**

16 **away?**

17 A Yes.

18 **Q And how old were you when you went to live**

19 **at Growing Together?**

20 A I don't know. It's hard for me to piece

21 back dates. Off the top of my head -- I don't want

22 to guess. I don't think I should guess. I don't

23 know.

24 **Q But you moved directly from living with**

25 **your parents to living at Growing Together?**

1 A I wouldn't say directly.

2 **Q How --**

3 A I'd say I stayed with my parents for --

4 like, I think I finished school at Crestwood. So I

5 would have been in, I don't know, I guess eighth

6 grade, finished eighth grade. And then -- I don't

7 know. I really don't know. Around eighth grade.

8 **Q You went to Growing Together?**

9 A I think -- I think it was then.

10 **Q And how many years did you live at Growing**

11 **Together?**

12 A Over a year.

13 **Q Were you ever in foster care?**

14 A What Growing Together was, was like a

15 group home that sent you away to foster parents every

16 night.

17 **Q So you lived in other people's homes**

18 **during the period of time you were assigned to**

19 **Growing Together?**

20 A Well, you stayed at Growing Together

21 during the day and then at night you get sent home

22 with parents.

23 **Q Did you go to school while you were at**

24 **Growing Together?**

25 A Yeah, they offer education there.

1 **Q So the education was at Growing Together?**

2 A Yeah.

3 **Q You did not attend a Palm Beach County --**

4 A I did, but you had to earn your levels up

5 to be able to go outside. So I don't remember what

6 level you have to get up to, to go out to another

7 school. I think there was like seven levels or

8 something. And you had to make it to, like, level 4

9 to be able to go to outside school.

10 **Q So for some period of time you were**

11 **assigned to Growing Together and you were going to**

12 **school at Growing Together. And for some period of**

13 **time you were going to other schools and coming back**

14 **to Growing Together?**

15 A Correct.

16 **Q And then when you came back to Growing**

17 **Together, you were sent to spend the night at a**

18 **family's home?**

19 A Yes.

20 **Q So you never slept at Growing Together?**

21 A No.

22 **Q Did you live -- other than living at or**

23 **staying at Growing Together during the day and**

24 **sleeping at these other homes at night, is there**

25 **anywhere else that you recall living in the period**

1 **between the ages of eighth grade and when you started**

2 **working at Mar-a-Lago?**

3 A Besides the ones I've told you about, you

4 know, I did run away from Growing Together quite

5 often. And I did end up being -- being abused by

6 another older guy who I stayed with for I don't know

7 how long.

8 **Q How old were you then?**

9 A I don't know. I'm sorry. I really wish I

10 could pinpoint dates. I don't know dates.

11 **Q Okay. What was that man's name?**

12 A [REDACTED]

13 **Q And how long were you living -- were you**

14 **living with [REDACTED]?**

15 A Yes.

16 **Q And for how long were you living with him?**

17 A I don't know.

18 **Q Days? Weeks? Months?**

19 A I don't know. I mean, it wasn't days. I

20 don't think it was weeks. It would have been close

21 to maybe a few months.

22 **Q Okay. And was [REDACTED] prosecuted**

23 **by federal authorities in South Florida?**

24 A Yes.

25 **Q And you were located by the FBI, I**

1 **believe?**

2 A Yes.

3 **Q And you gave an interview to the FBI**

4 **concerning your time with [REDACTED], correct?**

5 A Yes.

6 **Q Did you ever get a victim's notification**

7 **letter regarding your status as a victim in [REDACTED]**

8 **[REDACTED] federal criminal prosecution?**

9 A I don't know. My parents handled

10 everything.

11 **Q Do you know if your parents received such**

12 **a letter?**

13 A I don't know.

14 **Q Have you ever asked them?**

15 A No, I've never really brought it up with

16 them. It really pissed them off a lot, so I never

17 brought it up with them.

18 **Q It pissed them off that you were living**

19 **with [REDACTED]?**

20 A Yes.

21 **Q Why did it piss them off, if you know?**

22 A Well, I think they were just disgusted,

23 you know, that this happened to me again. And they

24 didn't want to talk about it. They didn't want to

25 talk about it.

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1 **Q But they were aware of it?**
 2 A Yes.
 3 **Q Your dad came and picked you up from the**
 4 **police station?**
 5 A Yes.
 6 **Q And your dad would not let you come home?**
 7 A Well, I think it was more my mom didn't
 8 want me to come home.
 9 **Q Did she say why?**
 10 A She just probably thought I was just going
 11 to keep running away again. And --
 12 **Q Did she say that to you?**
 13 A Well, I asked my dad at the police station
 14 if I could come home instead of going back to Growing
 15 Together. And he said my mom didn't want me to come
 16 home. And I told him if he didn't get me out within
 17 a week, I'd run away again and he'd never hear from
 18 me again.
 19 **Q And how is it that you came back to be**
 20 **living at their house, then?**
 21 A I ran away again and I called him up and I
 22 said, This is your final chance. And they came and
 23 picked me up and they let me live there.
 24 **Q And when did you go live with [REDACTED]**
 25 A Not long after that.

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1 **Q And when did you live with [REDACTED]**
 2 **parents?**
 3 A Well, I lived with [REDACTED] parents
 4 before I lived with [REDACTED] in his apartment.
 5 **Q And that was an apartment that [REDACTED]**
 6 **rented?**
 7 A [REDACTED] and his friend. I can't remember
 8 his friend's name. Mario, I think his friend's name
 9 was.
 10 **Q When did you live with [REDACTED]**
 11 **[REDACTED] as parents?**
 12 A That was just a brief stint. I didn't
 13 really stay there very long, but it was -- I was a
 14 runaway. That's in between times of -- I don't know.
 15 **Q How old were you?**
 16 A I don't know.
 17 **Q I just want to be clear. [REDACTED] rented**
 18 **an apartment that you moved into that he had rented,**
 19 **correct?**
 20 A Correct.
 21 **Q And that was after you had lived with**
 22 **[REDACTED] and his parents, correct?**
 23 A Yes.
 24 **Q And that was prior to you and [REDACTED]**
 25 **living with your parents when you started working at**

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1 **Mar-a-Lago, correct?**
 2 A Yes.
 3 **Q Do I have that sequence right?**
 4 A So far, yes.
 5 **Q And when did you stop living at your**
 6 **parents' at the time you started working at**
 7 **Mar-a-Lago? How long after you started at Mar-a-Lago**
 8 **do you stop living with your parents?**
 9 A I don't know exact dates. I was traveling
 10 with Jeffrey a lot, and I was making -- he was giving
 11 me lots of money for the sex that I had with him and
 12 Ghislaine.
 13 And after, I would say, a short time --
 14 I'm not too sure, darling, I don't know.
 15 **Q All right. Can you --**
 16 MS. MENNINGER: I have no recollection of
 17 which number we're on in terms of exhibit.
 18 MS. RODRIGUEZ: 15.
 19 **Q (MS. MENNINGER) Okay. I'd like to mark**
 20 **as Defendant's Exhibit 15 a document and see if you**
 21 **can identify it.**
 22 **Actually, before I do that, when do you**
 23 **recall ever getting a passport?**
 24 A I got my passport in New York. I don't
 25 know what age I was.

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1 **Q Okay. And did you -- how did you get it?**
 2 **Did you go somewhere or what happened?**
 3 A Jeffrey had me fill out paperwork and go
 4 to a Kodak shop or something similar of a Kodak shop
 5 and get my picture taken. I gave him my picture and
 6 my paperwork. He sent it away. And I think a week
 7 later he said he got it expedited.
 8 **Q Did you physically go to an office in New**
 9 **York?**
 10 A Jeffrey's office.
 11 **Q An office associated with Immigration or**
 12 **Homeland Security or whatever it was called back**
 13 **then?**
 14 A Not that I recall.
 15 **Q And do you know how old you were?**
 16 A No. I don't know how old you have to be
 17 to get a passport, so I'm not too sure.
 18 (Exhibit 15 marked.)
 19 **Q (BY MS. MENNINGER) Okay. I'm going to**
 20 **show you Defendant's Exhibit 15.**
 21 **Do you recognize this document?**
 22 A Yes.
 23 **Q Is this document the passport application**
 24 **that you filled out?**
 25 A Yes.

1 **Q Is it in your handwriting?**
 2 A Yes.
 3 **Q All right. What did you put down as your**
 4 **address at this time to mail the passport to? It's**
 5 **about the second line -- third line.**
 6 A Number 13?
 7 **Q Well, the third line says, Mail passport**
 8 **to. What address did you put down?**
 9 A Are we talking about number 13, Permanent
 10 address, do not list P.O. box, street?
 11 **Q No, I'm talking about the third line in**
 12 **the entire thing that says, Mail passport to.**
 13 A Oh, I'm sorry, up here, the [REDACTED]
 [REDACTED]
 [REDACTED]
 16 **Q All right. So you asked to have the**
 17 **passport mailed to you at your parents' address,**
 18 **right?**
 19 A I don't know if it was mailed to my
 20 parents' house, but that's the address I sent -- put
 21 down, yes.
 22 **Q Okay. And if you look a little bit**
 23 **further to the right, roughly equal with that line,**
 24 **do you see a date that's stamped on there?**
 25 A Yeah, January 12th, 2001.

1 **Q Okay. And then if you go down a little**
 2 **bit further, as you pointed out, line number 13, you**
 3 **gave your permanent address as your parents' address,**
 4 **again, correct?**
 5 A Correct.
 6 **Q If you look at box number 12 where it asks**
 7 **for occupation, what did you write down?**
 8 A Masseur.
 9 **Q Okay. If you look at line number 18, Have**
 10 **you ever been issued a U.S. passport before, what did**
 11 **you put down?**
 12 A No.
 13 **Q All right. And if you go down a little**
 14 **bit further than that, emergency contact, who did you**
 15 **put down?**
 16 A [REDACTED]
 17 **Q Okay. So is that the fiancé you were**
 18 **talking about earlier?**
 19 A Yes.
 20 **Q In January of 2001 were you still his**
 21 **affianced?**
 22 A Looks like it, yes.
 23 **Q And what address did you put down for**
 24 [REDACTED]
 25 A It's kind of hard to read. I think that's

1 a 3. I think it's [REDACTED]
 [REDACTED] I really can't make out
 3 the telephone number.
 4 **Q Okay. Do you see Relationship? Can you**
 5 **read that?**
 6 A Friend.
 7 **Q Okay. Do you see just below that there's**
 8 **a line that says number 21?**
 9 A Do not stop -- sorry, Do not sign
 10 application until requested to do so by
 11 administrating an oath.
 12 **Q Okay.**
 13 A Applicant's signature age 13 or older.
 14 **Q Oh, it's by the signature line?**
 15 A Yeah.
 16 **Q And that's your signature?**
 17 A Yes.
 18 **Q All right. And this is the document that**
 19 **you recall filling out for your first passport?**
 20 A I don't recall doing it, but yes, it's in
 21 my handwriting and it's got all of my information on
 22 it.
 23 **Q Okay. And on line -- box 23 it's got your**
 24 **driver's license checked off, right?**
 25 A July 23. Yeah, I really can't make out

1 numbers and stuff, though.
 2 **Q But the box, Driver's License is checked**
 3 **off?**
 4 A Yes.
 5 **Q Okay. And then if you look in the lower**
 6 **right-hand corner of the page, do you see what we**
 7 **call a Bates stamp number? I don't know if you know**
 8 **what that means.**
 9 A No.
 10 **Q Just the lower right-hand corner of the**
 11 **document.**
 12 A Giuffre 004721?
 13 **Q Okay. Thank you.**
 14 **So at January 2001 was [REDACTED]**
 15 **living [REDACTED]**
 16 A Well, he would have had to have been if I
 17 put it down there.
 18 **Q Okay. Was that the apartment that he had**
 19 **rented?**
 20 A No, it's in Royal Palm Beach. The
 21 apartment he rented was in Fort Lauderdale. So this
 22 could be my apartment that he lived at with me.
 23 **Q Okay. So his apartment where he lived**
 24 **with you was in Royal Palm Beach?**
 25 A Yes.

1 **Q And he rented that apartment?**
 2 MR. EDWARDS: Object to the form.
 3 Mischaracterization.
 4 A He lived there with me for a short period.
 5 I don't -- I don't know how long he lived there with
 6 me for.
 7 **Q (BY MS. MENNINGER) And who rented the**
 8 **apartment?**
 9 A Well, Jeffrey paid for the apartment. I
 10 was the occupant, and he was an occupant.
 11 **Q Did you ever see the lease?**
 12 A Yes, I believe I had to sign the paperwork
 13 saying that I was living there.
 14 **Q So you were living at -- is it [REDACTED]**
 15 **[REDACTED]**
 16 A I can't honestly read it. It looks like a
 17 C-a-c (sic), but that doesn't make sense.
 18 **Q So January of 2001 you signed a document**
 19 **under oath putting [REDACTED]**
 20 **[REDACTED]**
 21 A Yes.
 22 **Q And you put your permanent address and**
 23 **your mail your passport to at your parents'**
 24 **address --**
 25 A Yes.

1 **Q Let me have you put the paper down.**
 2 A Yes.
 3 **Q Do you recall applying for another**
 4 **passport?**
 5 A No.
 6 **Q Okay. Do you recall ever applying for**
 7 **another passport, ever?**
 8 A Well, yeah, when I got to Australia I had
 9 to -- I don't have it on me right now, but I could
 10 tell you it's -- I had to apply for another one
 11 because the other one ran out as expiree.
 12 **Q So whenever one expired, you applied for**
 13 **another one from the U.S.?**
 14 A (Indicating.)
 15 **Q Have you ever gotten --**
 16 **Is that right?**
 17 A Yeah.
 18 **Q Have you ever gotten a passport from**
 19 **Australia?**
 20 A An Australian passport?
 21 **Q Right.**
 22 A No.
 23 **Q Have you ever lost a passport and had to**
 24 **get one replaced?**
 25 A I don't think so.

1 **Q -- is that right?**
 2 **And it's your position that that is the**
 3 **apartment that Jeffrey paid for and you signed a**
 4 **lease?**
 5 A Yes, Jeffrey paid for it and I think I had
 6 to sign something that said I was going to occupy it.
 7 I don't know if James ever did.
 8 **Q Okay. And you stayed at that apartment**
 9 **from at least January 2001 until you left in the fall**
 10 **of 2002, right?**
 11 A I would say before then, yes. Like I
 12 said, I can't really tell you the exact date that I
 13 moved there, but --
 14 **Q Why did you have your passport sent to**
 15 **your parent's house if you weren't living at your**
 16 **parents' house?**
 17 A Um, I don't know. I guess a fail-safe.
 18 I'm not too sure.
 19 **Q When was the next passport that you got?**
 20 A I think I had to reapply for one in --
 21 well, this one expired in 2002. So I would have had
 22 to apply for another one.
 23 **Q I'm asking do you remember when you got**
 24 **another passport?**
 25 A This expired January 10th, 2002.

1 **Q When was the first time that you came back**
 2 **to the U.S. from Australia?**
 3 A October 16th, 2013.
 4 **Q And did you come back before that?**
 5 A No.
 6 **Q Did you ever tell Sharon Churcher or**
 7 **Sharon White or Marianne Strong that you were going**
 8 **on a trip to New York in 2011?**
 9 A No.
 10 **Q Is it your contention that Ghislaine**
 11 **Maxwell sexually trafficked you to famous people?**
 12 A If you have a document in front of you
 13 that you could show me so I could see what you're
 14 talking about, yes.
 15 **Q I'm asking you, is it your contention that**
 16 **Ghislaine Maxwell sexually trafficked you to famous**
 17 **people?**
 18 A Could you be more specific, like are we
 19 talking about rock stars or royalty or --
 20 **Q Politically connected and financially**
 21 **powerful people.**
 22 A Yes.
 23 **Q Okay. To whom did Ghislaine Maxwell**
 24 **sexually traffic you?**
 25 A You have to understand that Jeffrey and

1 Ghislaine are joined hip by hip, okay? So they both
2 trafficked me. Ghislaine brought me in for the
3 purpose of being trafficked. Jeffrey was just as a
4 part of it as she was. She was just as a part of it
5 as he was. They trafficked me to many people. And
6 to be honest, there is people I could name and then
7 there's people that are just a blur. There was so
8 much happening.

9 **Q Okay. Please name a person that Ghislaine
10 Maxwell directed you to go have sex with?**

11 A [REDACTED].

12 **Q Okay. Who else?**

13 A As a whole, they both trafficked me to
14 people. It was under both of their direction. So
15 it's not easy just to say Ghislaine. When I say
16 they, I mean both of them.

17 **Q Okay. Well, I need you to say a time when
18 Ghislaine Maxwell directed you to go have sex with
19 another person. So can you please tell me to whom
20 Ghislaine Maxwell asked you to go have sex with
21 another person?**

22 MR. EDWARDS: Object to the form.

23 A [REDACTED]

24 **Q (BY MS. MENNINGER) Who else?**

25 A I'm going to continue to tell you that

1 exactly what you would do for Jeffrey to him. Keep
2 him happy. I can't remember her exact words, and I'm
3 not going to put words in my mouth to make it sound
4 like what she said. But it was all along those
5 lines.

6 **Q Those are words that Ghislaine Maxwell
7 used to you in directing you to go have sex with
8 [REDACTED]?**

9 MR. EDWARDS: Object to the form.
10 Mischaracterized her testimony.

11 A Along those lines, yes.

12 **Q (BY MS. MENNINGER) Okay. Where were you
13 located when she used those words with you?**

14 A It could have been Palm Beach. It could
15 have been New York.

16 **Q You don't recall?**

17 A I don't recall.

18 **Q Okay. How old were you when she used
19 those words to you?**

20 MR. EDWARDS: Object to the form.
21 Mischaracterizes her testimony.

22 A I don't know. I would think I was 17.

23 **Q (BY MS. MENNINGER) But you're not sure?**

24 A Well, it was in the beginning, like after
25 my training. [REDACTED] were

1 they both directed me to do it. It was part of my
2 training. They both told me, you've got tickets to
3 go here. This is who you're meeting, and this is
4 what you're doing.

5 So [REDACTED] is another one.

6 **Q Ghislaine Maxwell directed you to go have
7 sex with [REDACTED]?**

8 MR. EDWARDS: Object to the form to the
9 extent it mischaracterized her testimony.

10 A I'm trying to tell you that they both did,
11 Ghislaine and Jeffrey both directed me. They both
12 paid me and they both directed me.

13 **Q (BY MS. MENNINGER) All right. When did
14 Ghislaine Maxwell direct you to go have sex with
15 [REDACTED]?**

16 MR. EDWARDS: Object to the form. Same
17 objection.

18 A I don't know the time. I don't -- you
19 know, I could tell you the place. I don't know the
20 time.

21 **Q (BY MS. MENNINGER) What words did
22 Ghislaine Maxwell use in talking to you and asking
23 you to go have sex with [REDACTED]?**

24 A We're sending you to a gentleman. We want
25 you to show him a good time. We want you to do

1 the two first people I was sent out to.

2 **Q Okay. Well, I was asking about [REDACTED]
3 [REDACTED] okay?**

4 A Right. That's what I'm saying. If you
5 want me to categorically tell you when it happened
6 and why I think I was 17, because those were the two
7 first people I was sent to.

8 **Q So you don't actually recall the
9 conversation regarding [REDACTED]? You don't
10 recall where you were, right?**

11 A I can't picture if it was New -- I know it
12 was either New York or Palm Beach. I don't remember
13 exactly which one.

14 **Q You don't recall exactly what words were
15 used by Ghislaine Maxwell in speaking to you,
16 correct?**

17 A I remember the tone that she used, the
18 type of words that she used. I can't word for word
19 replay what she said.

20 **Q All right. And so when in time was
21 [REDACTED]?**

22 A [REDACTED] was months, six months,
23 I'm not too sure.

24 **Q Six months what?**

25 A Before [REDACTED]. I don't know, I

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1 think I met Prince Andrew in 2001. And Glenn Dubin
 2 and Stephen Kaufmann were, like I said, the first
 3 people I was sent out to after my training. So I
 4 don't know. I'm not going to give you an exact time
 5 if I don't know it.

6 **Q I asked you the relative order.**
 7 A And I'm trying to give you it.

8 **Q And where does Alan Dershowitz fit into**
 9 **that group of people?**
 10 A Same. I can't tell you piece by piece by
 11 piece who -- I know Glenn Dubin was first.

12 **Q Okay.**
 13 A And I know Stephen Kaufmann was one of the
 14 first I was sent to. Alan Dershowitz could have been
 15 between there. Between, sorry, between Glenn and
 16 Stephen. The first time I was with Alan Dershowitz
 17 was in New York, so I wasn't actually sent to him.
 18 It actually happened at one of Jeffrey's residences.
 19 (Ms. McCawley left the deposition.)
 20 A So it's very hard for me to
 21 chronologically give you each person individually.

22 **Q (BY MS. MENNINGER) Okay. Name the other**
 23 **politically connected and financially powerful people**
 24 **that Ghislaine Maxwell told you to go have sex with?**
 25 A Again, I'm going to tell you "they"

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1 because that's how it went. They instructed me to go
 2 to George Mitchell, Jean Luc Brunel, Bill Richardson,
 3 another prince that I don't know his name. A guy
 4 that owns a hotel, a really large hotel chain, I
 5 can't remember which hotel it was. Marvin Minsky.
 6 There was, you know, another foreign
 7 president, I can't remember his name. He was
 8 Spanish. There's a whole bunch of them that I
 9 just -- it's hard for me to remember all of them.
 10 You know, I was told to do something by these people
 11 constantly, told to -- my whole life revolved around
 12 just pleasing these men and keeping Ghislaine and
 13 Jeffrey happy. Their whole entire lives revolved
 14 around sex.
 15 They call massages sex. They call
 16 modeling sex. They call --

17 **Q I asked you the names for people. Are you**
 18 **going to tell me any other names or is that all of**
 19 **them?**
 20 A I'm trying to think. That's the answer
 21 I'm trying to give to you. It's that it's so hard to
 22 just keep naming and naming and naming.

23 **Q All right.**
 24 A A lot of times I would be introduced to
 25 them. I didn't know --

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1 **Q If you're going to tell me more names,**
 2 **please continue your answer.**
 3 A I'm trying to think.
 4 **Q If you're just going to talk --**
 5 A I'm sorry. I'm trying to think.
 6 **Q Okay. Let's take a break and then you can**
 7 **think over the break.**
 8 THE VIDEOGRAPHER: We're off the record at
 9 2:01.
 10 (Recess taken from 2:01 p.m. to 2:09 p.m.)
 11 THE VIDEOGRAPHER: We're back on the
 12 record at 2:09.
 13 **Q (BY MS. MENNINGER) Ms. Giuffre, you have**
 14 **filed a lawsuit against Ghislaine Maxwell, correct?**
 15 A Yes.
 16 **Q You understand her to be my client,**
 17 **correct?**
 18 A Yes.
 19 **Q I'm here today to talk to you about your**
 20 **allegations against Ghislaine Maxwell.**
 21 **Do you understand that?**
 22 A Yes.
 23 **Q I want you to tell me a single time that**
 24 **you recall Ghislaine Maxwell using words to you and**
 25 **directing you to go have sex with another person --**

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1 MR. EDWARDS: Object.
 2 **Q (BY MS. MENNINGER) -- not anybody else,**
 3 **Ghislaine Maxwell?**
 4 MR. EDWARDS: Objection. Asked and
 5 answered.
 6 To the extent that she can answer the
 7 question, I'd ask that she answer the question.
 8 A I have answered the question. The
 9 question that you're asking me is Ghislaine. And
 10 Ghislaine and Jeffrey worked together. They were one
 11 and the same of persons. They both directed me to do
 12 this. They both directed me to report back to them.
 13 They were both the same.
 14 **Q (BY MS. MENNINGER) You cannot recall a**
 15 **single instance in which Ghislaine --**
 16 A I have to --
 17 **Q Excuse me.**
 18 **-- in which Ghislaine Maxwell alone**
 19 **directed you to have sex with another person --**
 20 A I have to --
 21 **Q -- correct?**
 22 A -- believe --
 23 MR. EDWARDS: Object.
 24 MS. MENNINGER: I am going to finish my
 25 question.

1 **Q (BY MS. MENNINGER) Correct?**
 2 MR. EDWARDS: Are you finished with your
 3 question?
 4 MS. MENNINGER: Now you may make your
 5 objection. And then she may answer.
 6 MR. EDWARDS: Okay. Objection.
 7 Argumentative. Harassing for absolutely no reason.
 8 Mischaracterizing the witness's testimony.
 9 Answer, if you can.
 10 A I have given you the names of the people
 11 that Ghislaine herself has told me to go be sex
 12 trafficked to, along with Jeffrey Epstein, okay?
 13 She's the one who brought me to Jeffrey
 14 Epstein to be trafficked in the fucking first place.
 15 So I have given you as much information as
 16 I possibly can to let you know what she was about,
 17 who she told me to go with, what she wanted me to do.
 18 That is what I am stating and that's what I
 19 previously stated to you.
 20 **Q (BY MS. MENNINGER) And these names that**
 21 **you have just given are people to whom Ghislaine**
 22 **Maxwell alone told you to go have sex?**
 23 MR. EDWARDS: Objection.
 24 Mischaracterization.
 25 A Ghislaine and Jeffrey, I don't know how

1 many times you want me to keep answering this
 2 question. Both told me to do this, okay? They both
 3 sent me to these people.
 4 How many times do you want me to answer
 5 this?
 6 **Q (BY MS. MENNINGER) I think you're**
 7 **answering a different question so that's why I'm**
 8 **going to ask you again. I am not asking you anything**
 9 **about a time when Jeffrey and Ghislaine together told**
 10 **you to go do something. I'm asking you to name a**
 11 **single time during which Ghislaine Maxwell acting**
 12 **alone directed you to go have sex with another**
 13 **person?**
 14 MR. EDWARDS: Objection. Asked and
 15 answered. Harassing. Argumentative.
 16 A I've given you the names of the people
 17 that Ghislaine instructed me to go have sexual
 18 relations with. I am not disclosing (sic) the fact
 19 that Jeffrey also told me.
 20 Ghislaine told me from her mouth to do
 21 these things. Jeffrey told me from his mouth to do
 22 these things with these people. Ghislaine instructed
 23 me to do the things that I did with Jeffrey Epstein
 24 on the very first meeting that I had with him. She
 25 brought me there under the preclusion (sic) that I

1 was going to be trained as a masseuse and that she
 2 instructed me to take off my clothes and to give oral
 3 sex to Jeffrey Epstein.
 4 **Q (BY MS. MENNINGER) Excuse me. I've asked**
 5 **you for the names.**
 6 A I've just given you a name. Jeffrey
 7 Epstein is a big name.
 8 **Q All right.**
 9 A She instructed me on that one.
 10 **Q So you're saying --**
 11 MR. EDWARDS: The witness is finishing her
 12 answer right now. She's in the process of explaining
 13 one of the people Ghislaine told her to have sex
 14 with.
 15 **Q (BY MS. MENNINGER) So you're saying**
 16 **Ghislaine Maxwell directed you to have sex with**
 17 **Jeffrey Epstein?**
 18 A Correct.
 19 **Q Ghislaine Maxwell directed you to have sex**
 20 **with Glenn Dubin?**
 21 A Correct.
 22 **Q What words did Ghislaine Maxwell tell you**
 23 **to go have sex with Glenn Dubin?**
 24 A It was the same all the time, all right?
 25 They want me to go provide these men with a massage.

1 And when they say massage, that means erotic, okay?
 2 That's their term for it. I think there are plenty
 3 of other witnesses that can attest to what massage
 4 actually means.
 5 And I'm telling you that Ghislaine told me
 6 to go to [REDACTED] and give him a massage, which
 7 means sex.
 8 **Q Okay. So [REDACTED] -- Ghislaine Maxwell told**
 9 **you to go give a massage to [REDACTED]**
 10 A Correct.
 11 **Q That's your testimony?**
 12 A That is my testimony.
 13 **Q All right. Ghislaine Maxwell told you to**
 14 **go give a massage to [REDACTED], correct?**
 15 A Correct.
 16 **Q Ghislaine Maxwell told you to give a**
 17 **massage to [REDACTED], correct?**
 18 A Correct.
 19 **Q Ghislaine Maxwell told you to give a**
 20 **massage to [REDACTED], correct?**
 21 A Correct.
 22 **Q When did Ghislaine Maxwell tell you to**
 23 **give a massage to [REDACTED]?**
 24 A I don't know dates.
 25 **Q Where were you?**

1 A When it happened?

2 **Q When Ghislaine Maxwell used the words, Go**

3 **give a massage to Bill Richardson, where were you?**

4 MR. EDWARDS: Object to the form.

5 Mischaracterizes her testimony.

6 A I can't tell you where we were. I know

7 where I was sent to. I don't know where we were when

8 she told me to do that.

9 **Q (BY MS. MENNINGER) Where were you sent**

10 **to --**

11 A New Mexico.

12 **Q -- by Ghislaine Maxwell?**

13 MR. EDWARDS: Object to the form.

14 Mischaracterizes her testimony again.

15 A Are you smiling at me because --

16 **Q (BY MS. MENNINGER) No, I'm asking you to**

17 **answer the question.**

18 A I have answered the question. I was sent

19 to New Mexico.

20 **Q Okay. Where were you sent from?**

21 A I already answered that. I don't know

22 where I was sent from.

23 **Q Okay.**

24 A I was flying everywhere with these people.

25 **Q Where were you sent by Ghislaine Maxwell**

1 **to have sex with [REDACTED] ?**

2 MR. EDWARDS: Object to the form.

3 Mischaracterized her testimony.

4 A Many places.

5 **Q (BY MS. MENNINGER) Ghislaine Maxwell sent**

6 **you to many places to have sex with [REDACTED] ?**

7 MR. EDWARDS: Object to the form.

8 A It happened at many places, yes.

9 **Q (BY MS. MENNINGER) You had sex with [REDACTED]**

10 **[REDACTED] at many places is what you're saying,**

11 **correct?**

12 A I was sent to [REDACTED] at many

13 places to have sex with him.

14 **Q When did Ghislaine Maxwell send you to a**

15 **place to have sex with [REDACTED] ?**

16 A You are asking --

17 MR. EDWARDS: Form.

18 A -- me to answer the impossible.

19 **Q (BY MS. MENNINGER) All right. When did**

20 **Ghislaine Maxwell send you to have sex with the owner**

21 **of a large hotel chain?**

22 MR. EDWARDS: Object to the form.

23 Mischaracterization.

24 A I'm going to keep answering the questions

25 the same way that I keep answering them. I don't

1 know where it was when she said to go do this.

2 **Q (BY MS. MENNINGER) Okay. Where were you**

3 **sent to have sex with the owner of a large hotel**

4 **chain by Ghislaine Maxwell?**

5 MR. EDWARDS: Object to the form.

6 A I believe that was one time in France.

7 **Q (BY MS. MENNINGER) Which time in France?**

8 A I believe it was around the same time that

9 Naomi Campbell had a birthday party.

10 **Q Where did you have sex with the owner of a**

11 **large hotel chain in France around the time of Naomi**

12 **Campbell's birthday party?**

13 A In his own cabana townhouse thing. It was

14 part of a hotel, but I wouldn't call it a hotel.

15 Jeffrey was staying there. Ghislaine was

16 staying there. Emmy was staying there. I was

17 staying there. This other guy was staying there. I

18 don't know his name.

19 I was instructed by Ghislaine to go and

20 give him an erotic massage.

21 **Q She used the words erotic massage?**

22 A No, that's my word. The word massage is

23 what they would use. That's their code word.

24 **Q Was she in the room when you gave this**

25 **erotic massage to the owner of a large hotel chain?**

1 A No, she was not in the room. She was in

2 another cabana.

3 **Q And other than telling you to go give the**

4 **owner of this large hotel chain a massage, do you**

5 **remember any other words she used to you to direct**

6 **you in what you should do?**

7 A Not at the time, no.

8 **Q Where did -- where were you and where was**

9 **Ms. Maxwell when she directed you to go have sex with**

10 **Marvin Minsky?**

11 MR. EDWARDS: Object to the form.

12 A I don't know.

13 **Q (BY MS. MENNINGER) Where did you go to**

14 **have sex with Marvin Minsky?**

15 A I believe it was the U.S. Virgin Islands,

16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.

17 Virgin Islands.

18 **Q And when was that?**

19 A I don't know.

20 **Q Do you have any time of year?**

21 A No.

22 **Q Do you know how old you were?**

23 A No.

24 **Q Other than Glenn Dubin, Stephen Kaufmann,**

25 **Prince Andrew, Jean Luc Brunel, Bill Richardson,**

1 **another prince, the large hotel chain owner and**
2 **Marvin Minsky, is there anyone else that Ghislaine**
3 **Maxwell directed you to go have sex with?**

4 A I am definitely sure there is. But can I
5 remember everybody's name? No.

6 **Q Okay. Can you remember anything else**
7 **about them?**

8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.

13 **Q Do you have any notes of all these people**
14 **that you were sent to?**

15 A No, I don't.

16 **Q Where are your notes?**

17 A I burned them.

18 **Q When did you burn them?**

19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.

21 **Q Did you have lawyers who were representing**
22 **you at the time you built a bonfire and burned these**
23 **notes?**

24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.

4 **Q So you burned notes of the men with whom**
5 **you had sex while you were represented by counsel in**
6 **litigation, correct?**

7 MR. EDWARDS: Object to the form.

8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.

11 **Q (BY MS. MENNINGER) When did you write**
12 **that journal?**

13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.

16 **Q So you did not write this journal at the**
17 **time it happened?**

18 A No.

19 **Q You started writing this journal**
20 **approximately a decade after you claim you finished**
21 **being sexually trafficked, correct?**

22 A Yes.

23 **Q And you started writing a journal after**
24 **you had a lawyer, correct?**

25 A Correct.

1 **Q Including Mr. Edwards, who is sitting**
2 **right here, correct?**

3 A Correct.

4 **Q What did that journal look like?**

5 A It was green.

6 **Q And what else?**

7 A It was just a spiral notebook.

8 **Q Okay. And what did you put into that**
9 **green spiral notebook?**

10 A Bad memories. Things that I've gone
11 through, lots of things, you know. I can't tell you.
12 There was a lot of pages. It was over 300 pages in
13 that book.

14 **Q Did you ever show that book to your**
15 **lawyers?**

16 A No.

17 **Q Did you show that book to anyone?**

18 A My husband.

19 **Q Did you show it to anyone else besides**
20 **your husband?**

21 A No.

22 **Q Did you tear out pages and give them to**
23 **Sharon Churcher?**

24 A No, I wrote -- those pages that you're
25 talking about, I wrote for her specifically. She

1 wanted to know about the Prince Andrew incident.

2 **Q So that's a different piece of paper?**

3 A Yeah, that's just random paper.

4 **Q So you had a green spiral notebook that**
5 **you began sometime in 2011 or 2012 in which you wrote**
6 **down your recollections about what had happened to**
7 **you, and you burned that in a bonfire in 2013.**

8 **Did I get that right?**

9 A You got that right.

10 **Q And do you have no other names of people**
11 **to whom you claim Ghislaine Maxwell directed you to**
12 **have sex, correct?**

13 A At this time, no.

14 **Q Is there any document that would refresh**
15 **your recollection that you could look at?**

16 A If you have a document you'd like to show
17 me, I would be glad to look at it and tell you the
18 names I recognize off of that.

19 **Q I'm just asking you if there's a document**
20 **you know of that has this list of names in it?**

21 A Not in front of me, no.

22 **Q Where is the original of the photograph**
23 **that has been widely circulated in the press of you**
24 **with Prince Andrew?**

25 A I probably still have it. It's not in my

1 possession right now.
 2 **Q Where is it?**
 3 A Probably in some storage boxes.
 4 **Q Where?**
 5 A In Sydney.
 6 **Q Where in Sydney?**
 7 A At some family's house. We got the boxes
 8 shipped to Australia, and they were picked up off the
 9 porch by my nephews and brought to their house.
 10 **Q Which is where?**
 11 A In Sydney.
 12 **Q Where in Sydney?**
 13 A [REDACTED]
 14 **Q And who lives in that house?**
 15 A Well, it's owned by my mother-in-law and
 16 father-in-law, but my nephews live in the house.
 17 **Q What are their names?**
 18 A I'm not giving you the names of my
 19 nephews.
 20 **Q What's the address of the house?**
 21 A Why would you want that?
 22 **Q I want to know where the photograph is.**
 23 **I'm asking you where the photograph is. And you've**
 24 **just told me it's somewhere in [REDACTED]**
 25 A Yes.

1 **Q So where in [REDACTED] is the photograph**
 2 **located?**
 3 A If I can't 100 percent say that the
 4 photograph is there, it could be at my house that I
 5 presently live in. I'm not going to give you the
 6 address of my nephews' residence.
 7 **Q When is the last time you saw the**
 8 **photograph in person?**
 9 A When I packed and left America.
 10 **Q Colorado?**
 11 A Yes.
 12 **Q All right. So you had that photograph**
 13 **here with you in Colorado?**
 14 A Yes.
 15 **Q What's on the back of the photograph?**
 16 A I'm sorry?
 17 **Q Is there anything on the back of the**
 18 **photograph?**
 19 A There's like the date it was printed, but
 20 no writing or anything.
 21 **Q Okay. Does it say where it was printed?**
 22 A I don't believe so. I think it just -- I
 23 don't remember. I just remember there's a date on
 24 it.
 25 **Q Whose camera was it taken with?**

1 A My little yellow Kodak camera.
 2 **Q Who took the picture?**
 3 A Jeffrey Epstein.
 4 **Q And where did you have it developed?**
 5 A I believe when I got back to America.
 6 **Q So where?**
 7 A I don't know.
 8 **Q Palm Beach?**
 9 A I don't know.
 10 **Q What is the date the photograph was**
 11 **printed?**
 12 A I believe it's in March 2001.
 13 **Q Okay.**
 14 A But that's just off of my photographic
 15 memory. I don't -- it could be different, but I
 16 think it's March 2001.
 17 **Q You have a photographic memory?**
 18 A I'm not saying I have a photographic
 19 memory. But if I'd look at the back of the photo and
 20 I remember what it says, I believe it was March 2001.
 21 **Q Did the photograph ever leave your**
 22 **possession for a while?**
 23 A I gave it to the FBI.
 24 **Q Okay. And when did you get it back?**
 25 A When they took copies of it.

1 **Q When was that?**
 2 A 2011.
 3 **Q When they came to interview you?**
 4 A Yes.
 5 **Q So from 2011 until you left Colorado it**
 6 **was in your personal possession?**
 7 A Yes.
 8 **Q What other documents related to this case**
 9 **are in that, storage boxes in Australia?**
 10 MR. EDWARDS: Object to the form.
 11 A Documents related to this case -- there --
 12 I don't know. I really can't tell you. I mean,
 13 there's seven boxes full of Nerf guns, my kids' toys,
 14 photos. I don't know what other documents would be
 15 in there.
 16 **Q (BY MS. MENNINGER) Did anyone search**
 17 **those documents after you received discovery requests**
 18 **from us in this case?**
 19 A I haven't been able to obtain those boxes.
 20 I can't get them sent back up to me. It's going to
 21 cost me a large amount of money. And right now I'm
 22 trying to look after my family, so I'm not able to
 23 afford to get them up.
 24 **Q You live in Australia, correct?**
 25 A I do.

1 **Q Okay. How far away are the boxes from**
 2 **where you live in Australia?**
 3 A Sydney is down here at the bottom. Cairns
 4 is up here at the top.
 5 **Q Okay.**
 6 A It's probably a six-day drive.
 7 **Q Did you fly here through Sydney?**
 8 A No.
 9 **Q Have you been to Sydney since you've moved**
 10 **back to Australia?**
 11 A I flew into Sydney with my three kids, but
 12 it was a connecting flight to Brisbane.
 13 **Q Did you ask your nephews or anyone else to**
 14 **search those boxes in response to discovery requests**
 15 **that we issued in this case?**
 16 A They are my nephews. I would never let
 17 them look at those.
 18 **Q Other than your green spiral notebook,**
 19 **what else did you burn in this bonfire in 2013?**
 20 A That was it.
 21 **Q That's the only thing?**
 22 A Yes.
 23 **Q Did you use wood?**
 24 A Yes.
 25 **Q Charcoal?**

1 A My husband built the bonfire out of wood
 2 and I don't know what else he put in it. He's the
 3 one who always makes the fires, not me.
 4 **Q Who else was present?**
 5 A Just him and I.
 6 **Q Were your kids there?**
 7 A No. They were inside sleeping.
 8 **Q And what beach was this?**
 9 A It wasn't a beach. It was in my backyard.
 10 **Q What's your address?**
 11 A At that time?
 12 **Q Um-hum.**
 13 A [REDACTED]
 14 [REDACTED]
 15 A Yes.
 16 **Q Who were your neighbors?**
 17 A Sweet people. Ray and -- I could look on
 18 my phone if you want.
 19 **Q No, thank you. Do they still live there?**
 20 A Yes.
 21 **Q Do you keep in touch with them?**
 22 A Last time I talked to them was a few
 23 months ago.
 24 **Q Did they see the fire?**
 25 A They've seen many fires that we've had.

1 We've had lots of bonfires there.
 2 **Q Did you ever ride in a helicopter with**
 3 **Ghislaine Maxwell acting as pilot of the helicopter?**
 4 A Yes.
 5 **Q Who else was on the flight?**
 6 A I've been on the helicopter with her
 7 plenty of times. I can't mention how many people
 8 were on the -- on the helicopter at the same time.
 9 **Q How many times?**
 10 A I don't know. Do you have helicopter
 11 records that you could show me?
 12 **Q I'm asking you how many times you were on**
 13 **the helicopter with Ghislaine Maxwell acting as the**
 14 **pilot --**
 15 A It's impossible for me to answer the
 16 question without having the actual physical records
 17 in front of me.
 18 **Q I'm asking you to look into your memory**
 19 **and tell me how many times you recall being on a**
 20 **helicopter with Ghislaine Maxwell at the pilot seat?**
 21 A There is no number I can give you.
 22 There's plenty of times I've been on her helicopter.
 23 **Q Where did you go from and to on a**
 24 **helicopter?**
 25 A I believe it was -- don't quote me on this

1 because I get confused on the islands there. I want
 2 to say it was St. John's. It could have been
 3 St. Barts. St. John or St. Barts, and then we would
 4 fly straight to Jeffrey's island.
 5 **Q Okay. Did you ever go anywhere else on**
 6 **the helicopter?**
 7 A No.
 8 **Q Were you ever on the helicopter with [REDACTED]**
 9 **[REDACTED] and Ghislaine Maxwell as the pilot of the**
 10 **helicopter?**
 11 A No.
 12 **Q Were you ever on the helicopter with [REDACTED]**
 13 **[REDACTED] and Ghislaine Maxwell as the**
 14 **pilot?**
 15 A No.
 16 **Q Do you recall telling Sharon Churcher that**
 17 **you were?**
 18 A No.
 19 **Q Did you see the press article in which**
 20 **Sharon Churcher reported that you were?**
 21 MR. EDWARDS: Objection. I'd just ask
 22 that if you're going to ask this witness about a
 23 specific article I'd like for her to see the article.
 24 Otherwise she's not going to testify about it.
 25 If you have something to show her, then,

1 please.

2 **Q (BY MS. MENNINGER) Do you recall seeing a**
3 **press article in which Sharon Churcher reported that**
4 **you were on a helicopter with [REDACTED] and**
5 **Ghislaine Maxwell as the pilot?**

6 MR. EDWARDS: Again, I'll let you answer
7 the question once she's looking at the document that
8 you're being asked about.

9 MS. MENNINGER: You're not letting her
10 answer a question about whether she recalls a
11 particular press statement?

12 MR. EDWARDS: I will let her answer every
13 question about the press statement as long as she
14 sees the press statement. I'm okay with that. She
15 can answer all of them.

16 MS. MENNINGER: No, there is a rule of
17 civil procedure that allows you to direct a witness
18 not to answer a question when there's a claim of
19 privilege.

20 What privilege are you claiming to direct
21 her not to answer this question?

22 MR. EDWARDS: I thought that you wanted
23 accurate answers from this witness. If the --

24 MS. MENNINGER: I asked her if she
25 recalled something --

1 **flying on a helicopter with Ghislaine Maxwell?**

2 A I believe that it was taken out of
3 context. Ghislaine told me that she flew [REDACTED]
4 [REDACTED] in. And Ghislaine likes to talk a lot of
5 stuff that sounds fantastical. And whether it's true
6 or not, that is what I do recall telling Sharon
7 Churcher.

8 **Q So you told Sharon Churcher that Ghislaine**
9 **Maxwell is the one who told you that she flew [REDACTED]**
10 **[REDACTED] in the helicopter?**

11 A I told Sharon Churcher that Ghislaine flew
12 [REDACTED] onto the island, based upon what
13 Ghislaine had told me.

14 **Q Not based upon what [REDACTED] had told**
15 **you, correct?**

16 A Correct.

17 **Q Did you ever ask Sharon Churcher to**
18 **correct anything that was printed under her name,**
19 **concerning your stories to Sharon Churcher?**

20 A I wasn't given those stories to read
21 before they were printed.

22 **Q After they were printed did you read them?**

23 A I tried to stay away from them. They were
24 very hard. You have to understand it was a very hard
25 time for me and my husband to have to have this

1 MR. EDWARDS: If the sole purpose is to
2 just to harass her --

3 MS. MENNINGER: I asked her if she
4 recalled something --

5 MR. EDWARDS: Then that's just not going
6 to be what's happening today.

7 **Q (BY MS. MENNINGER) All right. So you're**
8 **refusing to answer a question about whether you**
9 **recall a particular press statement --**

10 MR. EDWARDS: She's --

11 **Q (BY MS. MENNINGER) -- is that true?**

12 MR. EDWARDS: She is not refusing to
13 answer any questions. She --

14 A I'm not refusing to answer. I just want
15 to see the article you're talking about so I can be
16 clear in my statement.

17 **Q (BY MS. MENNINGER) Do you recall seeing a**
18 **press article written by Sharon Churcher reporting**
19 **that you flew on a helicopter with [REDACTED] and**
20 **Ghislaine Maxwell as the pilot?**

21 A No, I do not recall reading a press
22 article saying that I was on a helicopter with [REDACTED]
23 [REDACTED] as Ghislaine is the pilot.

24 **Q Do you recall telling Sharon Churcher that**
25 **you had conversations with [REDACTED] regarding him**

1 public -- we didn't think it was going to be this
2 publicly announced and that big. So we turned off
3 the news and we stopped reading so many things.

4 **Q You didn't read the articles about your**
5 **stories to Sharon Churcher --**

6 A I've read some articles --

7 **Q Let me just finish. You did not read the**
8 **articles published by Sharon Churcher about your**
9 **stories to Sharon Churcher?**

10 A I have read some articles about what
11 Sharon Churcher wrote. And a lot of the stuff that
12 she writes she takes things from my own mouth and
13 changes them into her own words as journalists do.

14 And I never came back to her and told her
15 to correct anything. What was done was done. There
16 was nothing else I can do.

17 **Q So even if she printed something that were**
18 **untrue you didn't ask her to correct it, correct?**

19 A There was things that she printed that
20 really pissed me off, but there was nothing I could
21 do about it. It's already out there.

22 **Q She printed things that were untrue,**
23 **correct?**

24 MR. EDWARDS: Objection to the form.
25 Mischaracterization.

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1 A I wouldn't say that they were untrue. I
 2 would just say that she printed them as journalists
 3 take your words and turn them into something else.

4 **Q (BY MS. MENNINGER) She got it wrong?**
 5 MR. EDWARDS: Object to the form.
 6 Mischaracterization.

7 A In some ways, yes.

8 **Q (BY MS. MENNINGER) Did she print things**
 9 **in her articles that you did not say to her?**
 10 MR. EDWARDS: I object and ask that the
 11 witness be given the opportunity to see the document
 12 so that she can review it and answer that question
 13 accurately. Otherwise she's unable to answer the
 14 question. I'm not going to allow her to answer.

15 MS. MENNINGER: You know the civil rules
 16 tell you not to suggest answers to your client.

17 **Q (BY MS. MENNINGER) And you understand**
 18 **your lawyer is now directing you to not all of a**
 19 **sudden remember what your answer is. That's what**
 20 **he's suggesting that you say. So you're not supposed**
 21 **to listen to him suggest that to you. You're**
 22 **supposed to tell me from your memory.**
 23 MR. EDWARDS: That is not what I'm --

24 **Q (BY MS. MENNINGER) Did you --**
 25 MR. EDWARDS: That's not what I'm doing.

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1 You don't get to just talk over me and
 2 tell my client when not to listen to me. All you
 3 have to do to get answers is show her the document
 4 you're talking about, and I'll let her answer every
 5 question. I don't know why we're so scared of the
 6 actual documents.

7 MS. MENNINGER: I don't know why you're
 8 scared of your client's recollection, Mr. Edwards.
 9 But anyway --

10 MR. EDWARDS: Why would you do this to
 11 her?

12 **Q (BY MS. MENNINGER) Did Sharon Churcher**
 13 **print things that you did not say?**
 14 MR. EDWARDS: I'm going to instruct my
 15 client not to answer unless you give her what it is
 16 that you're talking about that was printed. And she
 17 will tell you the answer, the accurate answer to your
 18 question. Just without the document to refresh her
 19 recollection and see it, she's not going to answer
 20 the question.

21 **Q (BY MS. MENNINGER) Did Sharon Churcher**
 22 **print things that you did not say?**
 23 MR. EDWARDS: Same objection. Same
 24 instruction not to answer.
 25 I think I've made a very clear record as

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1 to why I want my client to answer all of these
 2 questions, but I want her to have the fair
 3 opportunity to see this document.

4 **Q (BY MS. MENNINGER) Did Sharon Churcher**
 5 **print things that you felt were inaccurate?**
 6 MR. EDWARDS: Same objection. Same
 7 instruction. If she sees the document, she's going
 8 to answer every one of these questions.

9 **Q (BY MS. MENNINGER) Did any other reporter**
 10 **print statements that you believe are inaccurate?**
 11 MR. EDWARDS: Same objection. Same
 12 instruction.

13 **Q (BY MS. MENNINGER) Did any reporter print**
 14 **statements about Ghislaine Maxwell that were**
 15 **inaccurate?**
 16 MR. EDWARDS: Same objection. Same
 17 instruction.

18 This is harassing. This is harassing a
 19 sexual abuse victim. And all I'm asking is for
 20 fairness, that we just let her see the document so
 21 she can answer this.

22 MS. MENNINGER: Mr. Edwards, please stop
 23 saying anything other than an objection, what the
 24 basis is, or instructing your client not to answer.
 25 MR. EDWARDS: I will do that.

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1 MS. MENNINGER: That's what the Federal
 2 Rules of Civil Procedure provide.

3 MR. EDWARDS: I hear you. They also
 4 provide for fairness and civility. And all I'm
 5 asking, very calmly, is for her to see this.

6 MS. MENNINGER: Mr. Edwards, this is not
 7 your deposition. I'm asking your client what she
 8 remembers. If she doesn't want to talk about what
 9 she remembers, then let her not answer. But you
 10 cannot instruct her not to answer unless there's a
 11 privilege.

12 What privilege --

13 MR. EDWARDS: I am instructing her not to
 14 answer.

15 **Q (BY MS. MENNINGER) All right. You are**
 16 **refusing to answer questions about whether statements**
 17 **to the press about Ghislaine Maxwell attributed to**
 18 **you were inaccurate?**
 19 MR. EDWARDS: She's not refusing not to
 20 answer.

21 A You are refusing to show me these
 22 documents so I could answer properly. I would give
 23 you an answer if you were to show me some documents.

24 **Q (BY MS. MENNINGER) You can't say without**
 25 **looking at a document whether the press attributed to**

1 **you is accurate or inaccurate?**
 2 A Please show me the document.
 3 **Q You can't say from the top of your head**
 4 **whether any inaccurate statement has been attributed**
 5 **to you in the press?**
 6 A Please show me a document and I will tell
 7 you.
 8 **Q Are you refusing to answer my questions**
 9 **about your knowledge of whether inaccurate statements**
 10 **have been attributed to you in the press?**
 11 A Are you refusing to give me the documents
 12 to look at?
 13 **Q Are you refusing to answer the question?**
 14 A I am refusing to answer the question based
 15 upon the fact that you are not being fair enough to
 16 let me see the document in order to give you an
 17 honest answer.
 18 **Q Ms. Giuffre --**
 19 A Yes.
 20 **Q -- we are talking about press that has**
 21 **been published on the Internet, correct?**
 22 A Yes.
 23 **Q Do you have access to the Internet?**
 24 A Yes.
 25 **Q Have you looked on the Internet and read**

1 A Single sheets.
 2 **Q And did you write a long document or a**
 3 **short document? What was it?**
 4 A I can't recall how long the document was,
 5 but I would say it would be a few pages.
 6 **Q And other than asking you to write**
 7 **whatever you remember about [REDACTED], did she**
 8 **give you any other directions about what you should**
 9 **write?**
 10 A She was interested in two things, really.
 11 How Epstein got away with so many counts of child
 12 trafficking for sex and how [REDACTED] was
 13 involved in it. Those were her two main inquiries.
 14 **Q What did she ask you to write?**
 15 A She asked me to write about [REDACTED].
 16 **Q Did she tell you to put it in your own**
 17 **handwriting?**
 18 A No, she just asked me to write down what I
 19 can remember.
 20 **Q Did you give her everything that you**
 21 **wrote?**
 22 A Did I give her the whole entire pages that
 23 I wrote?
 24 **Q Yes.**
 25 A Yeah, I wrote pages for her specifically.

1 **articles that attribute statements to you about**
 2 **Ghislaine Maxwell?**
 3 A Yes.
 4 **Q Do you know any statement that has been**
 5 **attributed to you in a press article on the Internet**
 6 **about Ghislaine Maxwell that is untrue?**
 7 MR. EDWARDS: Same objection. Same
 8 instruction.
 9 A Please show me a specific document.
 10 **Q (BY MS. MENNINGER) Do you know of any**
 11 **such statement about Ghislaine Maxwell attributed to**
 12 **you by the press that is inaccurate?**
 13 A If you could please show me a specific
 14 document.
 15 **Q Tell me what Sharon Churcher asked you to**
 16 **write for her.**
 17 A Any knowledge that I had about my time
 18 with [REDACTED].
 19 **Q And did you write it?**
 20 A Um-hum.
 21 **Q What did you write it in or on?**
 22 A Paper.
 23 **Q What kind of paper?**
 24 A Lined paper.
 25 **Q Was it in a book or single sheets?**

1 **Q In your own handwriting?**
 2 A In my own handwriting.
 3 **Q And what you wrote, was that true?**
 4 A Yes.
 5 **Q And did you get paid for those pieces of**
 6 **paper?**
 7 A Not for the papers, I don't believe.
 8 **Q Okay. Have you gotten paid when they've**
 9 **been reprinted?**
 10 A No.
 11 **Q Have you negotiated any deal with Radar**
 12 **Online?**
 13 A No.
 14 **Q Have you negotiated any deal with Sharon**
 15 **Churcher for the purpose of publishing those pieces**
 16 **of paper?**
 17 A Not those pieces of paper.
 18 **Q When did you write those pieces of paper?**
 19 MR. EDWARDS: Object to the form.
 20 A A week before she came out.
 21 **Q (BY MS. MENNINGER) And when did you give**
 22 **them to her?**
 23 A When she came out.
 24 **Q When was that?**
 25 A Sometime, I believe, in early 2011.

1 **Q What did you get paid for, if not for**
2 **those pieces of paper?**

3 MR. EDWARDS: Object to the form.
4 A I was paid for the picture with [REDACTED]
5 [REDACTED] with his arm around me, Ghislaine in the
6 background. And I was paid for the, I guess, the
7 print of the stories.

8 **Q (BY MS. MENNINGER) Anything else?**

9 A No.

10 **Q You were not paid for those pieces of**
11 **paper?**

12 A No.

13 **Q All right. And how many pieces of paper**
14 **did you write?**

15 A Like I said, I'm rounding it around three.

16 **Q Three pieces of paper?**

17 A That's what I -- I don't remember to be
18 exact on a number. I'm sorry. But over three pages.

19 **Q And you wrote those sometime in 2011?**

20 A The week that she was coming out to see
21 me.

22 **Q And you gave them to her, right?**

23 A I gave them to her.

24 **Q Did you keep a copy of that?**

25 A No.

1 **that you were 16 years old?**

2 A No. I think -- I think they had played
3 the guessing game and I was 17.

4 **Q And so Ghislaine Maxwell did not tell**
5 **[REDACTED] that you were only 16?**

6 MR. EDWARDS: Object to the form.
7 Speculation.

8 **Q (BY MS. MENNINGER) In your presence?**

9 A I don't remember the exact conversation.
10 I just remember they liked to play the guessing game
11 a lot.

12 **Q And so you don't recall Ghislaine Maxwell**
13 **telling [REDACTED] in your presence that you were**
14 **quote, only, really only 16, right?**

15 A Correct, I don't remember that.

16 **Q And if that were in the paper, that would**
17 **be untrue, correct?**

18 A Correct.

19 MS. MENNINGER: I think now might be a
20 good time for a break.

21 THE DEPONENT: Thank you.

22 MR. EDWARDS: Okay. Sounds good.

23 THE VIDEOGRAPHER: We're off the record at
24 2:45.

25 (Recess taken from 2:45 p.m. to 2:55 p.m.)

1 **Q Did you rip them out to make them look**
2 **like they came out of a journal?**

3 A No.

4 **Q Were you directed to make them look like**
5 **they came out of a journal?**

6 A No.

7 **Q Do you know why your lawyer would have**
8 **told the federal judge in New York that that's what**
9 **you did?**

10 MR. EDWARDS: Object to the form.

11 A My lawyer in New York?

12 **Q (BY MS. MENNINGER) Um-hum.**

13 A Ripped them out of a journal?

14 **Q Said that you had. Do you know why she**
15 **would have said that?**

16 A Maybe she thought that I did.

17 **Q But you didn't?**

18 A They were just pieces of paper written for
19 Sharon Churcher's purpose.

20 **Q And not directed to look like they came**
21 **from a journal?**

22 A Nobody told me to make them look like they
23 came from a journal. They were just pieces of paper
24 that I wrote down for Sharon Churcher.

25 **Q Did Ghislaine Maxwell tell [REDACTED]**

1 THE VIDEOGRAPHER: We're back on the
2 record at 2:55.

3 **Q (BY MS. MENNINGER) Do you have any**
4 **photographs of yourself either nude or in a sexually**
5 **compromising position that you claim were taken by**
6 **Ghislaine Maxwell?**

7 A I do not have any of those in my evidence.
8 But if you ask Ghislaine Maxwell, she would have
9 plenty.

10 **Q Do you have any in your storage boxes in**
11 **Sydney?**

12 A No.

13 **Q Do you know whether your attorneys have**
14 **any such photographs that you claim were taken by**
15 **Ghislaine Maxwell?**

16 A No.

17 **Q You don't know or they don't have them?**

18 A I don't know. And I don't think they have
19 them. If they had them, they would have told me.
20 You should ask your client. She's got plenty of
21 them.

22 **Q What type of camera did Ghislaine Maxwell**
23 **use?**

24 A It was a black camera. And it had a, I
25 don't know the types and names of them, but the lens

1 that goes out.
 2 **Q Was it digital or single reflex?**
 3 A Again, I don't know types of cameras. I
 4 mean, I use my phone for using a camera. So it's a
 5 black camera and it had a lens that you could put out
 6 further or bring back.
 7 **Q Did you ask her to take any photographs of**
 8 **you?**
 9 A No. She asked to take photographs of me.
 10 **Q Was it a film or a digital camera?**
 11 A I never saw how she printed them out.
 12 **Q What's the first time you told anybody**
 13 **that you had been sexually trafficked?**
 14 MR. EDWARDS: Form.
 15 A Tony Figueroa, my ex-boyfriend, knew some
 16 of the stuff that was happening, though I did not go
 17 in great detail to him, being that he's my boyfriend.
 18 And then the first person I really opened up to about
 19 everything was my husband.
 20 **Q (BY MS. MENNINGER) Did you tell Tony**
 21 **Figueroa that you were forced to have sex with**
 22 **Jeffrey Epstein?**
 23 A Yes.
 24 **Q Did you tell Tony Figueroa you were forced**
 25 **to have sex with Ghislaine Maxwell?**

1 A Yes.
 2 **Q Did you tell [REDACTED] that Ghislaine**
 3 **Maxwell sent you to have sex with famous people?**
 4 A Yes.
 5 **Q When did you tell [REDACTED] that?**
 6 A During conversations. Like, I'd call him
 7 from places that I was at and just talk to him. And
 8 like I said, I wouldn't get into great detail about
 9 things. But, you know, I had to be with this person
 10 or that person today and --
 11 **Q Did you tell [REDACTED] not to call the**
 12 **police?**
 13 A No. [REDACTED] enjoyed his lifestyle with me.
 14 So he wouldn't have gone to the police.
 15 **Q Did you tell [REDACTED] that**
 16 **you were sexually trafficked?**
 17 A You know, I don't know what I told [REDACTED]
 18 at the time. I know he asked me and I think I told
 19 him, but I didn't get into detail with him.
 20 **Q What do you think you told him?**
 21 A That I wasn't just massaging these people.
 22 **Q Did you tell him what you were doing with**
 23 **Jeffrey Epstein?**
 24 A Yes.
 25 **Q Did you tell [REDACTED] what**

1 **you were doing with Ghislaine Maxwell?**
 2 A Yes.
 3 **Q Did you tell him what you were doing to**
 4 **other people?**
 5 A I don't think I told him about many other
 6 people, no.
 7 **Q What people did you tell him about?**
 8 A Mainly Ghislaine and Jeffrey.
 9 **Q When did you tell him that?**
 10 A From the start.
 11 **Q When was the start that you told him?**
 12 A From, I wouldn't say the first meeting,
 13 but I told him around that time.
 14 **Q And what did [REDACTED] tell you to**
 15 **do?**
 16 A He didn't mind what I had to do. Again,
 17 he was another guy that used me because I made lots
 18 of money, and he didn't tell me to do anything.
 19 **Q Did he tell you not to tell the police?**
 20 A No, he didn't tell me not to do anything.
 21 **Q Did he tell you to tell the police?**
 22 A Again, he told me not -- he didn't tell me
 23 to do anything.
 24 **Q When did you tell your parents that you**
 25 **were sexually trafficked by Jeffrey Epstein?**

1 A After I had my kids.
 2 **Q When did you tell your parents that you**
 3 **were sexually trafficked by Ghislaine Maxwell?**
 4 A I told them the same time about Jeffrey
 5 and Ghislaine. So sometime after I had my children.
 6 **Q After you had had all three children or**
 7 **after you had your first child?**
 8 A I think after I had all three of my
 9 children.
 10 **Q What was the last year in which you had a**
 11 **child?**
 12 A 2010.
 13 **Q So you believe you told your parents**
 14 **sometime after 2010 that you had been sexually**
 15 **trafficked?**
 16 A Yes.
 17 **Q You didn't tell your parents that you had**
 18 **a lawsuit entitled Jane Doe 102 versus Jeffrey**
 19 **Epstein in 2009?**
 20 A I wasn't very close with my parents.
 21 **Q Why not?**
 22 A We just had a hard relationship.
 23 **Q Why?**
 24 A Because we did. I don't know why. Some
 25 people just don't get along.

1 **Q Do you get along with your parents now?**
 2 A I get along with my parents now, yes.
 3 **Q Okay. Have you ever told anyone that you**
 4 **were a sex slave for four years?**
 5 A Under the assumption that I got my dates
 6 wrong, yes, I probably have.
 7 **Q And that's not true, correct?**
 8 A Not because I didn't mean it to be true.
 9 Just because I didn't know my dates.
 10 **Q So four years is not two years, correct?**
 11 MR. EDWARDS: Object to the form.
 12 A Four years is not two years.
 13 **Q (BY MS. MENNINGER) What did your parents**
 14 **say when you told them that you had been sexually**
 15 **trafficked by Jeffrey Epstein and Ghislaine Maxwell?**
 16 A I believe they were disgusted.
 17 **Q What did they tell you to do or to not do?**
 18 A I don't remember the exact conversations
 19 that we had, but they weren't happy.
 20 **Q Were they both on the phone at the same**
 21 **time?**
 22 A No.
 23 **Q Who was on the phone first?**
 24 MR. EDWARDS: Object to the form.
 25 A I don't know.

1 **Q (BY MS. MENNINGER) You were in Australia**
 2 **at the time, correct?**
 3 A Yes.
 4 **Q They were not?**
 5 A Yes.
 6 **Q Have they ever been to see you in**
 7 **Australia?**
 8 A My dad has.
 9 **Q Has your mom ever been to see you in**
 10 **Australia?**
 11 A No, my mom is afraid of flying.
 12 **Q When did your dad come to see you in**
 13 **Australia?**
 14 A The birth of my son, my first one in 2006.
 15 And then, I believe in 2010 when my daughter was
 16 born.
 17 **Q And did you have this conversation with**
 18 **your dad about this in person or on the phone?**
 19 A I've had conversations with him about it
 20 since.
 21 **Q I'm talking about the first time you had a**
 22 **conversation with your dad.**
 23 A On the phone.
 24 **Q What caused you to tell him in 2010?**
 25 A I was just starting to accept what I had

1 been through. I think for ten, however long many
 2 years, I mean, over ten years, I had tried to start a
 3 new life, become a new person. And I wanted to put
 4 all that stuff behind me and not think about it. But
 5 after you have children, something changes in you and
 6 you just want to stand up and do the right thing and
 7 protect any other children from having to go through
 8 this.
 9 **Q Did you tell your parents how much money**
 10 **you received from your settlement with Jeffrey**
 11 **Epstein?**
 12 A No. That is a -- I think there's like a
 13 non-disclosure statement. I don't know exactly what
 14 the legal term is, but --
 15 **Q Did you send any money to your parents?**
 16 A No, I don't -- no. No, I've never sent
 17 money to my parents.
 18 **Q Who is [REDACTED] ?**
 19 A One of [REDACTED] shady friends.
 20 **Q Did you talk to [REDACTED] about**
 21 **your involvement with Jeffrey Epstein?**
 22 A No.
 23 **Q Did you ever live with [REDACTED] ?**
 24 A No, he used to come over to my house.
 25 **Q Between 2000 and 2002 did you ever have**

1 **any interactions with law enforcement?**
 2 A Yes.
 3 **Q When?**
 4 A When I tried to break away from Jeffrey
 5 and Ghislaine, I started making myself unavailable.
 6 And I got a job at Road House Grill. And Tony used
 7 to come pick me up in the afternoons, at nighttime,
 8 and he'd sit at the bar. And there's this big cup
 9 that's got tips in it.
 10 I was in the back room. And I had to --
 11 first you have to sign out and you have to take off
 12 your aprons, put your aprons away. And there's a
 13 whole bunch of cleaning up stuff you have to do.
 14 In that time period, Tony grabbed money
 15 from a cup that had money in it. That was for the
 16 bartenders for their tips. My boss called me the
 17 next day. He told me that I had stolen the money,
 18 which I hadn't. And I came back and I returned the
 19 money after I confronted Tony about it. Gave the
 20 money back to him and he said, I'm sorry, but it's
 21 just law that I have to call the police. So he
 22 called the police.
 23 And knowing that Jeffrey has got the Palm
 24 Beach Police Department in his pocket, I went to
 25 Jeffrey Epstein and I told him what had happened.

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1 And Jeffrey said, Don't worry about it. Let me take
 2 care of it for you.
 3 **Q Okay. I'm sorry. When did you have**
 4 **interaction with law enforcement, then?**
 5 A What year?
 6 **Q Did you speak with a law enforcement**
 7 **officer?**
 8 A I don't believe I spoke to them. Jeffrey
 9 handled everything.
 10 **Q Okay. And you said that you had finished**
 11 **your shift at -- this is at the Road House Grill,**
 12 **correct?**
 13 A Correct.
 14 **Q You had finished your shift?**
 15 A Yeah, it was the end of the shift.
 16 **Q Okay. And you had cleaned up and were**
 17 **checking out, correct?**
 18 A Yeah, it's a completely separate part of
 19 the -- it's like back of the house. Do you know what
 20 that means, like in waitering terms?
 21 **Q (Indicating.)**
 22 A Yeah, back of the house.
 23 **Q And what was -- who was this boss that you**
 24 **spoke to?**
 25 A I can't remember his name.

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1 **Q Okay.**
 2 A But, I mean, he was very nice. He didn't
 3 want to but he just had to because it's just the law.
 4 You know, the money was returned to him, but he still
 5 had to do what he had to do.
 6 **Q You paid him back the money the next day?**
 7 A Very next day.
 8 **Q And did you ever speak with the Palm Beach**
 9 **County Sheriff's Office about it?**
 10 A You know, I don't know if they called me
 11 or not, but I know that since my boss told me he had
 12 to call the police, I went to Jeffrey. And Jeffrey
 13 said he'd handle it.
 14 **Q How old were you at the time?**
 15 A I don't know, 18, maybe 19.
 16 **Q You weren't a juvenile, were you?**
 17 A Well, juvenile being under 18, no.
 18 **Q Is that the only interaction with law**
 19 **enforcement that you had between 2000 and 2002?**
 20 A Correct.
 21 **Q Were you, in fact, charged with theft**
 22 **based on that case?**
 23 A No charges were ever brought to me.
 24 **Q Do you know if they were filed?**
 25 A No. Jeffrey told me he'd handle it, and I

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1 never heard anything about it ever again.
 2 **Q Did you ever check to see if you had a**
 3 **warrant out?**
 4 A No. Jeffrey told me that he took care of
 5 it.
 6 **Q Do you think it's a problem to leave the**
 7 **country when you have an outstanding warrant?**
 8 MR. EDWARDS: Object to the form.
 9 Foundation. Lack of predicate.
 10 A I don't think I have an outstanding
 11 warrant. Why would I -- do you have a document that
 12 says I have an outstanding warrant?
 13 **Q (BY MS. MENNINGER) I'm just asking you if**
 14 **you believe it's a bad thing to leave the country**
 15 **when you have an outstanding warrant?**
 16 A Absolutely.
 17 **Q And you would never assist someone in**
 18 **doing that, correct?**
 19 A Correct.
 20 **Q During the year 2015, have you spoken to**
 21 **law enforcement about any topic other than Ghislaine**
 22 **Maxwell?**
 23 A In 2015?
 24 **Q Um-hum.**
 25 A Did I talk to any law enforcement about

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1 Ghislaine Maxwell?
 2 **Q About anything other than Ghislaine**
 3 **Maxwell?**
 4 MR. EDWARDS: And I would just object at
 5 this point in time and instruct the witness not to
 6 convey any answers as to who she has or who she has
 7 not disclosed until such time as the Court rules on
 8 the current outstanding motion.
 9 I know that we have some obligations to
 10 fulfill by the 4th. We intend to do that. And I
 11 also recognize we may be back to answer some of these
 12 questions. But for today, she's not going to answer
 13 those questions.
 14 MS. MENNINGER: Well, I'm just going to
 15 ask them and --
 16 MR. EDWARDS: I understand.
 17 **Q (BY MS. MENNINGER) Have you spoken to any**
 18 **law enforcement in Colorado since the beginning of**
 19 **January 2015?**
 20 A I can't answer that question right now.
 21 MR. EDWARDS: Hold on one second. I may
 22 be able to get you an answer to that question. Can I
 23 take -- can I just take a quick break, and I think I
 24 can answer that particular question for you?
 25 MS. MENNINGER: I'm not asking you to

1 answer any questions --
 2 MR. EDWARDS: Fine.
 3 MS. MENNINGER: -- Mr. Edwards.
 4 MR. EDWARDS: Fine.
 5 MS. MENNINGER: I appreciate it, but I'm
 6 asking the witness to answer these questions.
 7 MR. EDWARDS: I know, I'm just trying to
 8 help you today.
 9 For today, don't answer the questions.
 10 THE DEPONENT: I don't mind explaining.
 11 MR. EDWARDS: I know, but you --
 12 THE DEPONENT: Okay.
 13 MR. EDWARDS: I wanted to help.
 14 THE DEPONENT: Okay.
 15 **Q (BY MS. MENNINGER) So have you spoken to**
 16 **any law enforcement officers in Colorado since**
 17 **January of 2015 until today?**
 18 A I am not answering that question.
 19 **Q Have your attorneys spoken to any law**
 20 **enforcement officers in Colorado since the beginning**
 21 **of 2015 until today?**
 22 A I'm not answering that question.
 23 **Q Have you been living with your husband in**
 24 **Australia since October of 2015?**
 25 A Yes.

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 **Q** [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 **Q** [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 **other terms of his probationary period?**
 2 A No. He went to everything that he was
 3 supposed to go to.
 4 **Q Has he paid his fines?**
 5 A Yes, as far as I know.
 6 **Q Describe for me the contract that you had**
 7 **with the Mail On Sunday?**
 8 A Could you be a little bit more specific?
 9 Like --
 10 **Q Have you had more than one contract with**
 11 **the Mail On Sunday?**
 12 A Well, there was one contract for the
 13 picture. And that was to pay me 140,000 for the
 14 picture. And then two stories were printed after
 15 that for the amount of 10,000 each.
 16 **Q Is that the only money that you received**
 17 **from the Mail On Sunday?**
 18 A Correct.
 19 **Q Did you receive any money for syndication**
 20 **of the photograph?**
 21 A Isn't that what the 140 was for?
 22 **Q I'm asking you.**
 23 A Well, I don't really know what syndication
 24 means.
 25 **Q Did you have a written contract with the**

1 **Mail on Sunday?**
 2 A Yes.
 3 **Q Where is that contract right now?**
 4 A I don't know. I've moved that many times.
 5 I -- I lose paperwork wherever I go.
 6 **Q Is it possible it's in the boxes in**
 7 **Sydney?**
 8 A I don't think I kept it, to be honest.
 9 **Q Did you ever refer back to it after you**
 10 **signed it?**
 11 A I know I kept it for a short while, but I
 12 mean, like I said, I've moved countries twice in the
 13 last two years and three different houses. So the
 14 paper trail is lost. I don't know where it would be.
 15 **Q Did you receive it via e-mail?**
 16 A No. I received it -- Sharon Churcher
 17 handed it to me by paper.
 18 **Q And you signed it?**
 19 A I signed it.
 20 **Q And then did you make a copy of it?**
 21 A No.
 22 **Q You never had a copy of it?**
 23 A Well, I had my own copy. I'm sure she has
 24 hers.
 25 **Q Do you recall there being a period of**

1 **exclusivity?**
 2 A Yes.
 3 **Q What was that period?**
 4 A I believe it was like a three-month period
 5 or something.
 6 **Q Okay. And what other terms of the**
 7 **contract, do you recall?**
 8 A I couldn't talk to any other news
 9 publication about the story.
 10 **Q Anything else?**
 11 A Not that I know of.
 12 **Q Were you happy when the period was up?**
 13 A Well, I mean, at that time I wanted to
 14 write about my story. So I guess, yes, I was happy
 15 when that period was up.
 16 **Q And you were actively writing a book at**
 17 **that time, correct?**
 18 A My manuscript. I've never published it.
 19 **Q You were writing the manuscript at the**
 20 **time of your period of exclusivity with Sharon**
 21 **Churcher, correct?**
 22 A Those three months were just craziness. I
 23 think I started after that.
 24 **Q You think you started writing the book**
 25 **after the 90 days were up?**

1 A Yeah.
 2 **Q And then you attempted to sell that**
 3 **manuscript, correct?**
 4 A I didn't attempt to sell it. I went to
 5 other publications, like, what do you call them?
 6 People -- I'm trying to think of the name of the
 7 word. People who publish books, not like a newspaper
 8 or anything. And I inquired about what they thought
 9 of my manuscript and if they thought it was, you
 10 know, a good story. And, yeah.
 11 **Q So you sent the manuscript to these people**
 12 **for the purposes of trying to publish the book,**
 13 **correct?**
 14 A Some people, yes.
 15 **Q And you were trying to get money from the**
 16 **book publication, correct?**
 17 A Well, I wasn't going to sell it to them
 18 for free.
 19 **Q But you were unsuccessful in finding**
 20 **someone to publish it, correct?**
 21 A Well, I was always on the fence with it.
 22 I wasn't too sure if I wanted to or didn't want to.
 23 I was more seeking judgment based upon these people
 24 who have done this plenty and plenty of times.
 25 Still to this day, I mean, I've had people

1 who have been interested in it and I still don't know
 2 if I want to do it yet. I mean, I think there's a
 3 lot more that can go into it, you know.
 4 **Q You were actively sending the manuscript**
 5 **to people for purposes of having them reach a deal**
 6 **with you and publish it, correct?**
 7 A No deal was ever talked about. What we
 8 talked about was the possibility of publishing it, is
 9 it publishing-worthy, would I need to get a
 10 ghostwriter. You know, this is the first time I've
 11 ever written a manuscript so I didn't know what I was
 12 doing.
 13 **Q Okay. You contacted Jarred Weisfeld,**
 14 **correct?**
 15 A Correct.
 16 **Q I'm going to mark a document as**
 17 **Defendant's Exhibit 16. It is a composite exhibit.**
 18 **(Exhibit 16 marked.)**
 19 MR. EDWARDS: Thank you.
 20 **Q (BY MS. MENNINGER) I'm not going to ask**
 21 **you to read every single page of this, but if you**
 22 **look at the first page.**
 23 A Um-hum.
 24 **Q Can you tell what this is in terms of what**
 25 **type of document?**

1 A It's an e-mail from me to Jarred.
 2 **Q Okay. And there's also e-mails from**
 3 **Jarred to you on the same page, correct?**
 4 A Yes.
 5 **Q And can you tell -- I just presume that**
 6 **you know that you have turned over documents in this**
 7 **case; is that true?**
 8 A Yes.
 9 **Q All right. And do you see at the bottom**
 10 **it's got your name and some page numbers in the**
 11 **bottom right-hand corner?**
 12 A Giuffre 003529?
 13 **Q Right.**
 14 A Yes.
 15 **Q So you understood that your lawyers sought**
 16 **from you e-mails, for example?**
 17 A Yes.
 18 **Q And searched your computer, correct?**
 19 A Correct.
 20 **Q And printed out e-mails, correct?**
 21 A Yes.
 22 **Q And these look like some of the e-mails?**
 23 A Yes.
 24 **Q Okay. Do you have any reason to believe**
 25 **that e-mails produced by your lawyers with your name**

1 on the e-mail address line are anything other than
 2 your e-mail?
 3 A No, they're my e-mails.
 4 Q Okay. Did anyone else use your e-mail
 5 account?
 6 A No.
 7 Q Okay.
 8 A I mean, well, my husband uses it
 9 sometimes. My kids use it for games.
 10 Q Okay.
 11 A But that's about it.
 12 Q So if an e-mail is signed XOXO Jenna --
 13 A Yes.
 14 Q -- is that you?
 15 A Correct.
 16 Q All right. And do you believe anyone else
 17 in your family was communicating with
 18 [REDACTED]
 19 A No, no one else.
 20 Q All right. What was the purpose of you
 21 communicating with Jarred?
 22 A We were trying to figure out if my book
 23 was -- my manuscript was ever published or
 24 publishable. And this was at a time where there was
 25 a lot of controversy about what's going on around JE.

1 And when I say JE, I mean Jeffrey Epstein.
 2 It was a very scary thing for a lot of publishers to
 3 even consider taking it on because Jeffrey is a very
 4 powerful person.
 5 Q Did you send your manuscript to Jarred?
 6 A I believe I did.
 7 Q All right. Did you ask Jarred to send it
 8 on to other people like [REDACTED]
 9 MR. EDWARDS: Object to the form.
 10 A I can't -- I can't recall. I believe I
 11 met [REDACTED] through Jarred.
 12 Q (BY MS. MENNINGER) Okay. I'm going to
 13 ask you to turn -- well, on the first page, the
 14 second e-mail says, is Epstein too big for [REDACTED]
 15 Does that refresh your recollection that
 16 Jarred and [REDACTED] had something to do with one another?
 17 A Yes.
 18 Q Okay. And on the second page in the
 19 middle of the page, just to be clear, is that an
 20 indication that, [REDACTED] definitely does not want the
 21 book, XOXO Jenna.
 22 Is that what you wrote?
 23 A Yes.
 24 Q And these first e-mails are in 2000 --
 25 July of 2012, correct?

1 A Yes.
 2 MR. EDWARDS: I object just to the
 3 apparent mischaracterization.
 4 MS. MENNINGER: Of 2012?
 5 MR. EDWARDS: Being the first e-mails.
 6 MS. MENNINGER: I only meant the first
 7 pages of this composite exhibit.
 8 MR. EDWARDS: Okay.
 9 MS. MENNINGER: But I appreciate your
 10 clarification.
 11 MR. EDWARDS: Okay.
 12 Q (BY MS. MENNINGER) The first e-mails of
 13 this composite exhibit are dated July of 2012,
 14 correct?
 15 A Correct.
 16 MR. EDWARDS: The first page. As opposed
 17 to the first in the chronological timeline.
 18 MS. MENNINGER: Yes.
 19 MR. EDWARDS: Okay.
 20 Q (BY MS. MENNINGER) If you flip sort of
 21 anywhere towards the back, can you also see that
 22 you -- there are e-mails between yourself and Jarred
 23 in 2011?
 24 A Excuse me. And which page?
 25 Q Really, you can take your pick anywhere

1 from the back of that exhibit?
 2 A Yeah, yeah, I see what you're talking
 3 about.
 4 Q Here. Why don't I direct you to the
 5 bottom right is Giuffre 3563. Now, it's going to be
 6 a little tricky to find, but it's about eight
 7 pages -- I'm sorry, six pages from the back of the
 8 composite exhibit.
 9 A Yes.
 10 Q Do you see on that page an e-mail from
 11 yourself to Jarred from June 7th of 2011?
 12 A Yes.
 13 Q And in that e-mail you write: Dear Jarred
 14 Weisfeld, We spoke on the phone going back a couple
 15 months regarding the story I am writing called, The
 16 Billionaires Playboy Club.
 17 Right?
 18 A Correct.
 19 Q I am no longer under any contract and
 20 would like to ask you to review my synopsis and if
 21 you are interested I would love for you to represent
 22 me as my literary agent.
 23 Correct?
 24 A Correct.
 25 Q I've included some of the press that has

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1 covered the ongoing case of Jeffrey Epstein, the
 2 world's richest pedophile. And my good friend and
 3 journalist Sharon Churcher has a few from her
 4 articles that she has written to send to you as well.
 5 **Correct?**
 6 A Correct.
 7 **Q I am very serious about getting my book**
 8 **published and believe this story will cover many**
 9 **genres of interest, not only by those following the**
 10 **lengthy case, but it is also a woman's story of**
 11 **glitz, glamour, sorrow, compassion, and true love. I**
 12 **hope you enjoy.**
 13 **Correct?**
 14 A Correct.
 15 **Q Signed, yourself?**
 16 A Yes.
 17 **Q So in about June you sent to Jarred**
 18 **Weisfeld a synopsis and were asking him to represent**
 19 **you as your literary agent to sell the book, correct?**
 20 A Yes.
 21 **Q And you characterized Sharon Churcher as**
 22 **your good friend, correct?**
 23 A Well, at that time -- you have to
 24 understand, Jarred and Sharon are very close. Sharon
 25 is the one who introduced me to Jarred. And that's

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1 just being nice.
 2 **Q Do you disagree that Sharon Churcher was**
 3 **your good friend at that time?**
 4 A Well, at that time I did trust her a lot
 5 more than what I do now.
 6 **Q Why did you change your opinion of Sharon**
 7 **Churcher?**
 8 A You know, I -- I just -- I think -- I
 9 think talking to some journalists can be very
 10 dangerous, especially sometimes how words can get
 11 taken out of context. And I'm not saying that she's
 12 a bad person. I'm just saying that just, I wouldn't
 13 call her up and ask her what she's cooking for dinner
 14 tonight or how the family is doing.
 15 **Q Did you ever introduce her to your hair**
 16 **stylist?**
 17 A No.
 18 **Q All right.**
 19 A Oh, actually, yes, I did. She did get a
 20 haircut where I was at.
 21 **Q All right.**
 22 MS. MENNINGER: So if I could have the
 23 e-mails with Paulo Silva, please. I'm going to mark
 24 these Defendant's Exhibit -- 18 -- 17.
 25 Oh, I don't know if that's -- is that just

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1 one? All right.
 2 MR. EDWARDS: What are we on now, 17?
 3 MS. MENNINGER: 17.
 4 (Exhibit 17 marked.)
 5 **Q (BY MS. MENNINGER) Very similarly, can**
 6 **you take a look at this exhibit? It is a composite**
 7 **of documents produced by your attorneys with various**
 8 **Bates ranges, Bates numbers in between Giuffre 2750**
 9 **and 3928.**
 10 A 2750 and --
 11 **Q I think -- I think the last page is 3927,**
 12 **but it does not contain all of -- I'm sorry, 3928.**
 13 **But it does not contain all of the pages in between,**
 14 **just to let you know.**
 15 A Okay. Is there one specific that you want
 16 me to look at?
 17 **Q No, if you can just take a look at the**
 18 **first page.**
 19 A Okay.
 20 **Q And tell me if you know who this person**
 21 **is?**
 22 A Paulo Silva is somebody who works for the
 23 Mail On Sunday. And he was the one in charge of
 24 paying me.
 25 **Q Paying you for what?**

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1 A The 140 plus the 10 and the 10.
 2 **Q Okay. And did he also pay you on an**
 3 **ongoing basis for further sales of the photograph of**
 4 **yourself and [REDACTED]?**
 5 A No, it was a set fee of 140 plus the 10
 6 and 10. But they broke it up for some reason. So as
 7 you can see here, Thanks for transferring the money.
 8 I will let you know when it reaches my bank account
 9 but just a little bit confused as I have a previous
 10 e-mail with the amount owed at 4100. Is there still
 11 an outstanding amount yet to be paid.
 12 So they broke it up into quite a lot of
 13 different fractions but it still equaled the 140 plus
 14 the 10 and the 10.
 15 **Q Okay. If I could ask you to flip back to**
 16 **Giuffre 2758. They're in sequential order, so it**
 17 **should be about eight pages back.**
 18 A Yes.
 19 **Q All right. Do you see -- do you see that**
 20 **that's an e-mail from Paulo Silva to your e-mail**
 21 **account?**
 22 A Yes.
 23 **Q On or about March 28th, 2011?**
 24 A Yes.
 25 **Q All right. And it appears to be his**

1 **introductory e-mail to you. Is that a fair**
 2 **characterization of it?**
 3 A It would be hard to say. Like, I'd have
 4 to look at the first one. That's June 24th. This is
 5 March 28th. I suppose so, if he's introducing
 6 himself as Paulo Silva.
 7 **Q All right. And in this e-mail he**
 8 **introduces himself by name and tells you that he**
 9 **works for Solo Syndication and represents they are**
 10 **the official syndication agency for Daily Mail and**
 11 **Mail On Sunday and that he's been overseeing the**
 12 **syndication of your image, correct?**
 13 A Correct.
 14 **Q All right. And then he tells you that**
 15 **with regard to your image with [REDACTED] he can**
 16 **confirm that they've been able to sell it frequently**
 17 **over the last couple of weeks. And he listed the**
 18 **names of various news agencies to whom they had sold**
 19 **the image, correct?**
 20 A Correct.
 21 **Q And then he tells you what the sales were**
 22 **as of last Friday and then what your share of it is,**
 23 **correct?**
 24 A Correct.
 25 **Q And your share of it was approximately**

1 **half of whatever the sales were, correct?**
 2 A Yes, it looks that way.
 3 **Q All right. And so then he gave you their**
 4 **general payment terms, correct?**
 5 A (Deponent perused document.)
 6 Yes. Yep.
 7 **Q And is that syndication deal separate and**
 8 **apart from your deal with the Mail On Sunday to get**
 9 **paid for the stories and a chunk --**
 10 A Yes.
 11 **Q -- for the image?**
 12 A So I will have to correct my previous
 13 statement.
 14 **Q Okay.**
 15 A So I forgot completely about the fact that
 16 I received 4,487.50 for -- for the pictures that got
 17 sold.
 18 **Q And is it possible it was sold some more**
 19 **after this date, for which you received some money,**
 20 **correct?**
 21 A I don't believe so. I -- I didn't even
 22 remember this one, to be honest. So if there's any
 23 others that you can show me, I'd be happy to look at
 24 them.
 25 **Q Well, I'm just asking you if you remember**

1 **what the terms of your agreement were with this**
 2 **syndication, Solo Syndication?**
 3 A Well, like you said, it looks like half
 4 of --
 5 In regards to your image with [REDACTED]
 6 [REDACTED] I can confirm we've been able to sell it
 7 quite frequently over the last few weeks. So far
 8 we've been able to sell it to the following clients.
 9 It lists names.
 10 So far the total sales, as of last Friday,
 11 is the number listed there.
 12 Therefore, your share is 4,487.
 13 **Q So let me be clear. I guess I'm asking,**
 14 **do -- do you recall what your deal was with Solo**
 15 **Syndication?**
 16 A No, I do not recall it. I just remember
 17 Sharon writing up the contract saying 140 plus the 10
 18 and the 10. I completely forgot about the
 19 syndication for \$4,000 and 487 cents (sic).
 20 **Q Okay. I'm going to ask you to turn back**
 21 **to 2754.**
 22 A 2754?
 23 **Q Correct.**
 24 A Okay.
 25 **Q And it's a document with the heading Solo**

1 **Syndication Limited. Is that the right page you're**
 2 **on?**
 3 A Yes.
 4 **Q Dated May 23rd, 2011, correct?**
 5 A Yes.
 6 **Q All right. And there's some handwriting**
 7 **in the middle of the page towards the bottom.**
 8 A Not my handwriting.
 9 **Q It's not your handwriting?**
 10 A No.
 11 **Q Do you know whose it is?**
 12 A No.
 13 **Q All right.**
 14 A I don't even know what it says. Does it
 15 say Chai canceled and something mode? I have no idea
 16 what it even says.
 17 **Q Okay. And it's not your handwriting?**
 18 A No.
 19 **Q It was produced by your attorneys,**
 20 **correct?**
 21 A I'm sorry?
 22 **Q It was produced to us by your attorneys,**
 23 **correct?**
 24 A Yes. They went through and gave you guys
 25 everything you asked for.

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1 **Q All right. Since these e-mails come from**
 2 **your e-mail address to and from Paulo Silva, do you**
 3 **have any reason to doubt that they are your e-mails?**
 4 A I have no reason to doubt.
 5 **Q All right. Do you recall a Sandra White?**
 6 A Yes. She was a possible ghostwriter that
 7 I was going to use. Sharon recommended that I got a
 8 ghostwriter to be involved. And we nearly settled on
 9 some kind of agreement, but I wasn't really happy
 10 with the agreement in the end, so I decided not to
 11 use her.
 12 **Q You weren't happy with the terms of her**
 13 **price, if you will?**
 14 A Yes.
 15 **Q And so you didn't come to an agreement**
 16 **with her, correct?**
 17 A We nearly did, but we in the end did not.
 18 **Q All right. If I can show you Defendant's**
 19 **Exhibit -- whew -- 18.**
 20 MR. EDWARDS: You did kill a tree there.
 21 **Q (BY MS. MENNINGER) Take a look at that.**
 22 **(Exhibit 18 marked.)**
 23 THE DEPONENT: So put this one away?
 24 MR. EDWARDS: Put these in some sort of
 25 order. They don't have to be perfect, but just so

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1 you know what you're looking at.
 2 This is 18?
 3 **Q (BY MS. MENNINGER) All right. Again, do**
 4 **you recognize that the e-mail address --**
 5 A Is mine.
 6 **Q -- is yours and it's from and to Sandra**
 7 **White, correct?**
 8 A Correct.
 9 **Q And the date is in or around May 25th,**
 10 **June 5th, something like that?**
 11 A It's Australian so it's backwards. So
 12 it's the 6th of May, 2011.
 13 **Q Well, I would have thought that except the**
 14 **bottom e-mail is May 24th, the middle one is May 25th**
 15 **and then the most recent one says 6/5. So I don't --**
 16 **I don't know. I didn't write the document.**
 17 A Yeah.
 18 **Q But I'm asking if you believe it was in or**
 19 **around the end of May?**
 20 A The only reason I can tell you that is
 21 because if you look here, 24/5/11 is the way that we
 22 actually do our dates in Australia, whereas in
 23 America you would do 5/24/11.
 24 So right here where it's written makes it
 25 nice and clear but just to be clear, the dates are

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1 backwards.
 2 **Q Right. So if an e-mail is responding to**
 3 **May 25th, is it more or less likely that it was**
 4 **written on June 5th or May 6th?**
 5 MR. EDWARDS: Object to the form.
 6 A I would say May 6th.
 7 **Q (BY MS. MENNINGER) So when responded to a**
 8 **May 25th --**
 9 A Oh, no, you're right. No, I'm sorry, I'm
 10 going backwards because it's going up, isn't it?
 11 Okay. Yes.
 12 **Q All right.**
 13 A I'm confused, too.
 14 **Q Anyway. In the last e-mail it says: I'm**
 15 **very sad we won't be able to work together as I've**
 16 **been very excited about the project. As you know, I**
 17 **do not sell synopsis or individual chapters, and**
 18 **especially not for those amounts. I'm merely**
 19 **intrigued about where you were getting advice from.**
 20 **Rest assured what we have worked on is confidential.**
 21 **If you change your mind, let me know.**
 22 **So that was around June 5th?**
 23 A 2011.
 24 **Q 2011, right?**
 25 A Yes.

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1 **Q All right. So you had been trying to**
 2 **reach an agreement with Sandra White prior to**
 3 **June 5th?**
 4 A Correct.
 5 **Q And were unable to do so?**
 6 A Yes.
 7 **Q And not that you need to read every page,**
 8 **but is it fair to say that you exchanged some**
 9 **portions of your synopsis with Sandra during the**
 10 **course of your interactions with her?**
 11 A Yes. And she rewrote some portion of it
 12 as well, which I don't even know, it might be in
 13 here. It might not be in here. I don't know what
 14 I've kept or not kept.
 15 **Q Okay. And did you get advice from Sharon**
 16 **Churcher with respect to the terms upon which you**
 17 **should be looking for the ghostwriting agreement?**
 18 A Sharon is the one who introduced me to
 19 Sandra. I can't remember who was giving me the
 20 advice. It's going back so long ago, you know, I
 21 don't want to pinpoint somebody and say it was
 22 definitely them if it wasn't.
 23 So, yeah, I'm just not going to comment on
 24 that one without knowing.
 25 **Q Okay. You probably have e-mails, though,**

1 **do you think, perhaps?**
 2 A I haven't seen these e-mails since 2011.
 3 So --
 4 **Q Okay. I'm going to show you Defendant's**
 5 **Exhibit 19.**
 6 **(Exhibit 19 marked.)**
 7 **Q (BY MS. MENNINGER) Who is Marianne**
 8 **Strong?**
 9 A She's my literary agent.
 10 **Q All right. And can you identify**
 11 **Defendant's Exhibit 19?**
 12 A I'm sorry?
 13 **Q Can you identify what Defendant's**
 14 **Exhibit 19 is?**
 15 A Defendant's Exhibit 19, like the number at
 16 the bottom?
 17 **Q No, do you know what kind of document this**
 18 **is?**
 19 A Oh, it's an e-mail from me to Marianne
 20 Strong.
 21 **Q All right. And at roughly what time**
 22 **frame?**
 23 A February 20th, 2014.
 24 **Q All right. And what were you speaking**
 25 **with Marianne or writing with Marianne Strong about?**

1 A Can I just read it real quick and I'll
 2 tell you?
 3 **Q Sure.**
 4 **(Pause.)**
 5 A Sure.
 6 **Q Do you remember now the topic upon which**
 7 **you and Marianne Strong were exchanging**
 8 **communication?**
 9 A I don't recall talking about [REDACTED]
 10 [REDACTED]
 11 [REDACTED]. I don't know who Emily is. But I
 12 do understand what she's saying. If I win, then my
 13 story would be a much better story to write.
 14 **Q And what case was she referring to, if you**
 15 **know?**
 16 A I think this was regarding probably the
 17 time when I was in -- trying to get involved with the
 18 CVRA case.
 19 **Q In February of 2014?**
 20 A Correct.
 21 **Q Okay. And at the bottom of the page**
 22 **there's an e-mail from you to her, correct?**
 23 A I haven't read that part yet. Give me one
 24 moment.
 25 **Q Yeah.**

1 A Thank you.
 2 So it cuts off after that, does it?
 3 **Q Um-hum.**
 4 A Oh, sorry. (Pause.)
 5 Yep, I've read it.
 6 **Q All right. Do you remember that e-mail**
 7 **now?**
 8 A It's going back a long time ago, but it's
 9 definitely my kind of writing.
 10 **Q Okay. So in the -- on the bottom of the**
 11 **first page, 3417 --**
 12 A Um-hum.
 13 **Q -- you represented to Marianne Strong that**
 14 **you had served four years as Jeffrey Epstein's**
 15 **personal and abused sex slave, correct?**
 16 A Correct.
 17 **Q That is not true, correct?**
 18 A Since we have now found out the actual
 19 dates, it is not correct.
 20 **Q Okay. I want to turn the page, the second**
 21 **page. On the first line, the first full sentence**
 22 **that begins on the first line:**
 23 **Even though there is over 40 women that**
 24 **were once vulnerable girls that looked like the sweet**
 25 **girl next door but now that they have been taken**

1 **advantage of by this disgusting Wall Street tyrant,**
 2 **most of them have led a very unhealthy lifestyle**
 3 **since having served Jeffrey, such as drug addictions**
 4 **and prostitution and do not hold accreditation to**
 5 **talk.**
 6 **You wrote that, correct?**
 7 A Correct.
 8 **Q Who are the 40 women that you are talking**
 9 **about here?**
 10 A When I spoke to the FBI, they told me that
 11 there were -- and this is maybe just a guesstimate,
 12 maybe there was more, maybe there was less that they
 13 said. But they had told me that there was a lot of
 14 other victims involved in this case. And this is
 15 when I believed that after the FBI came to see me
 16 that they were willing to reopen the case and do
 17 something about it.
 18 **Q Okay. So the FBI is the one that told you**
 19 **that there were 40 women?**
 20 A It could be less than 40. It could be
 21 more than 40. I think I just summed it up to 40.
 22 **Q You came up with 40?**
 23 A Well, I didn't just come out with 40. I
 24 think it was around that number. It could be 46. It
 25 could be 39. I'm not too sure to be exact.

1 **Q All right. But you based it on --**
 2 A On my speaking --
 3 **Q -- what?**
 4 A -- with the FBI.
 5 **Q Okay. And --**
 6 MR. EDWARDS: Just let her finish her
 7 question before you answer.
 8 THE DEPONENT: Okay.
 9 MR. EDWARDS: I just want the record
 10 clear.
 11 **Q (BY MS. MENNINGER) Who at the FBI did you**
 12 **speak with?**
 13 A I can't think of his name. I spoke to --
 14 oh, God, I can't even think of his name right now. I
 15 spoke to a male and a female. And I also spoke to
 16 Marie Villafana about everything that was happening.
 17 **Q Is it Jason Richards?**
 18 A Jason Richards, yes.
 19 **Q Did Jason Richards tell you that the FBI**
 20 **was reopening their case?**
 21 A He wanted to reopen the case. And the
 22 last conversation that I had with him, I can't
 23 remember when it was, he said that he was having
 24 trouble doing it from the people above him.
 25 **Q Okay. When was that?**

1 the assumption that the case was being reopened, that
 2 they still were investigating.
 3 **Q Okay. Did you believe that the FBI had**
 4 **reopened their case in 2011?**
 5 A I believe that's when they first started
 6 to reinvestigate and reopen it.
 7 **Q And then sometime when you were in Florida**
 8 **Jason Richards told you that they were not actually**
 9 **going to continue investigating the case?**
 10 A I believe I was in Florida, yes. And he
 11 didn't say that -- he just said his hands were tied
 12 and up above, I don't know, chain of command, it
 13 just -- it didn't look like it was going anywhere.
 14 There was no definite no and a definite yes. It was
 15 just, right now there's really nothing that we can
 16 do.
 17 **Q All right. In the third paragraph from**
 18 **the top, you said there's another major paper that**
 19 **has followed the story for a while that has worked**
 20 **with me before and they were asking you for the**
 21 **exclusive story but updated and obviously the end**
 22 **outcome from the judicial decision.**
 23 **Who was the other major paper that had**
 24 **followed the story for a while and was asking you for**
 25 **an exclusive story?**

1 A Like I said, I don't know.
 2 **Q Was it like a year ago or two years ago or**
 3 **three years ago?**
 4 A I don't remember the last time I talked to
 5 him. I think I was in Florida the last time I spoke
 6 to him.
 7 **Q And was that on the phone or in person?**
 8 A On the phone.
 9 **Q Hmm?**
 10 A On the phone.
 11 **Q On the phone. Where was he located, if**
 12 **you know, when you spoke to him?**
 13 A I don't know.
 14 **Q Do you have his phone number?**
 15 A I have his card somewhere. Probably not
 16 on me anymore. Like I told you, my paper trail is
 17 (indicating).
 18 **Q Okay. So in the fourth line you say:**
 19 **Miraculously since I came to light with the truth in**
 20 **speaking out against him in 2011, the FBI have**
 21 **reopened the case. Which as you know, has current**
 22 **proceedings in which I am involved in.**
 23 **So what current proceeding were you**
 24 **involved in on February 19th, 2014?**
 25 A Well, just speaking with the FBI, I was in

1 A That would -- that, just coming to mind
 2 must be the Daily Mail. If I said I've worked with
 3 them before, the only other -- the only other, what
 4 do you call them, press, that I had worked with was
 5 the Daily Mail, so --
 6 **Q Okay. But you said you had held out on**
 7 **them because Marianne had told you about her contact**
 8 **with Emily at the New York City Post, right?**
 9 A I have held out because you told me about
 10 your contact with Emily with the New York Post, and I
 11 appreciate you trying to make big headlines for the
 12 story and hopefully one day the book. Yes.
 13 **Q Okay. And then the last line of that**
 14 **paragraph you say: I would also like to know that**
 15 **I'm going to profit from this as well, correct?**
 16 A Correct. I'm not going to give it for
 17 free.
 18 **Q Right. All right.**
 19 **(Exhibit 20 marked.)**
 20 MS. MENNINGER: Defendant's Exhibit 20.
 21 **Q (BY MS. MENNINGER) Do you recognize these**
 22 **documents -- this document, which is another**
 23 **composite exhibit?**
 24 A Yes.
 25 **Q Do you recognize it?**

1 A Oh, like I said, I don't recognize it, but
 2 it obviously comes from --
 3 **Q Your e-mail address?**
 4 A Yes.
 5 **Q Now, what e-mail address is that, exactly,**
 6 **on the first page of this exhibit?**
 7 A @icloud.com, that must be from a phone.
 8 **Q So that's different from the other e-mail**
 9 **address?**
 10 A Yeah, I don't actually know about that
 11 e-mail address. I obviously used it. [REDACTED]
 12 [REDACTED]
 13 **Q And is the e-mail signed by your husband?**
 14 A No, it's signed by me.
 15 **Q Okay. And in the subject line you wrote**
 16 **Virginia Roberts (Jane Doe 102), correct?**
 17 A Subject line?
 18 **Q The very top line of that page.**
 19 A Oh, yeah, I see.
 20 **Q Okay. And it was to**
 21 **jason.richards2@ic.fbi.gov, correct?**
 22 A Correct.
 23 **Q And is that Jason Richards we were just**
 24 **referring to?**
 25 A Yes.

1 **Q All right. And you had some e-mails with**
 2 **Jason Richards over time; is that fair?**
 3 A Sure.
 4 **Q These ones that came from your computer,**
 5 **right?**
 6 A Sure, yes.
 7 **Q Okay. You talk about having spoken with**
 8 **Judge Paul Cassell in this first page, correct?**
 9 A I am here to get this BS non-prosecution
 10 agreement thrown out and speaking with Judge Paul
 11 Cassal (sic). He suggested trying to get ahold of
 12 any photos or video recordings released by the FBI to
 13 assist our case further in providing (sic) how much
 14 pedophilia occurred by Jeffrey and the many other
 15 monsters he obliged with underage girls.
 16 **Q Okay.**
 17 A If this is a possibility, please let me
 18 know so I can give you Brad Edwards (my attorney) his
 19 contact details. Many thanks for your time and I
 20 hope we should meet again.
 21 **Q Okay. And so you were going back to Jason**
 22 **and trying to get any evidence that the FBI had about**
 23 **your case, right?**
 24 A Correct. Any photographs pertaining to
 25 what -- myself, not of anyone else.

1 **Q Right.**
 2 A But anything they had of me.
 3 **Q And Brad Edwards, who is sitting right**
 4 **here, was your attorney at the time and you**
 5 **identified him as such in the e-mail, correct?**
 6 A Correct.
 7 **Q You did not identify Mr. -- Judge Cassell**
 8 **as your attorney in this e-mail, correct?**
 9 A I knew him as a former judge, and I just
 10 wrote down, Judge Paul Cassal (sic) as it looks. But
 11 he was my attorney -- I don't know if he was my
 12 attorney at that time. But yes -- he's always --
 13 he's been with me since the beginning, so --
 14 **Q So he's representing you in this case now,**
 15 **correct?**
 16 A Yes.
 17 **Q But at that time you don't know if he was**
 18 **your attorney?**
 19 A I think he was. I mean, I've been talking
 20 with him since the beginning. And this is dated
 21 2014. So I believe at this time he was my attorney
 22 at the time as well.
 23 **Q Okay. When do you recall first speaking**
 24 **with him?**
 25 A Speaking with Paul, I'm not too sure. I

1 can't remember if I spoke to Paul in the phone in
 2 Australia or if I met him in person in Florida.
 3 **Q Do you remember when you signed any kind**
 4 **of fee agreement with him?**
 5 MR. EDWARDS: Object to the form.
 6 A Um, the -- well, the first time I would
 7 have signed an agreement would have been in Florida.
 8 **Q (BY MS. MENNINGER) When you were living**
 9 **in Titusville?**
 10 A As far as my knowledge reminds me. I
 11 mean, I'm looking at e-mails that I can't even
 12 remember sending. It's a possibility I could have
 13 signed earlier, but as far as I remember.
 14 **Q Okay. Do you recall ever having e-mail**
 15 **communications with Sharon Churcher about her**
 16 **publishing the first serial of your book?**
 17 A Serial, what does that mean? I'm sorry.
 18 **Q Like a sequel.**
 19 A A sequel to my book?
 20 **Q Um-hum.**
 21 A My book has never been published.
 22 **Q Right. Do you remember ever e-mailing**
 23 **with Sharon about her being the one who would publish**
 24 **any subsequent follow-up book?**
 25 A If you have something in front of you to

1 see and show me I would look at it. Like I said,
 2 there's a million e-mails here. I mean, there's a
 3 whole dead tree with e-mails I don't remember
 4 sending. So --
 5 **Q So you don't remember that e-mail chain,**
 6 **as you sit here?**
 7 A Yes.
 8 **Q Okay. You have signed contingency fee**
 9 **agreements with Boies, Schiller, correct?**
 10 A Yes.
 11 **Q You've signed contingency fees with**
 12 **Mr. Cassell, correct?**
 13 A Correct.
 14 **Q Mr. Edwards and his firm?**
 15 A Correct.
 16 **Q Stan Pottinger; is that correct?**
 17 A Correct.
 18 **Q And pursuant to those fee agreements you**
 19 **understand that you would get a recovery of any money**
 20 **that you won in this case, correct?**
 21 A Correct.
 22 **Q And what percent is that?**
 23 A I don't know off the top of my head. I
 24 think it's 40 percent. I'm not too sure, to be
 25 honest.

1 **Q Do you remember having any conversations**
 2 **with [REDACTED] about money that you hoped to**
 3 **obtain from this case or from any other source**
 4 **related to this?**
 5 A I remember talking to [REDACTED] as a
 6 girlfriend telling her what cases I was involved
 7 with. I don't believe we ever spoke about any
 8 monetary settlements. There was no number that was
 9 ever mentioned. I told her that I was involved in
 10 these cases. And, you know, it was just girlfriend
 11 talk between girlfriends. I never expected her to
 12 turn around and consort with the enemy.
 13 **Q Well, it's fair to say you do hope to make**
 14 **money from bringing this lawsuit, correct?**
 15 MR. EDWARDS: Form.
 16 A I hope to win, but that's not the only
 17 reason I want to win. I want to see justice come
 18 through.
 19 **Q (BY MS. MENNINGER) Is money one of the**
 20 **reasons you want to win?**
 21 MR. EDWARDS: Same objection.
 22 A More than the money, I want to see
 23 Ghislaine and Jeffrey own up to what they have done
 24 and pay for the price, yes.
 25 **Q (BY MS. MENNINGER) Is money tight in your**

1 **family?**
 2 A We've been doing well.
 3 **Q You've been doing well?**
 4 A Yes.
 5 **Q What is your source of income right now?**
 6 A My husband is the main income -- he's the
 7 breadwinner and I'm a stay-at-home mom.
 8 **Q And what is his job?**
 9 A [REDACTED]
 10 [REDACTED]
 11 [REDACTED].
 12 **Q And how long has he had that job?**
 13 A He got that job, I believe, in December or
 14 January. December 2015 or January 2016. I know he
 15 got the job and then we had to go through all these
 16 preliminary tests and everything to make sure you
 17 qualify. So --
 18 **Q And what is the last paid employment that**
 19 **you had?**
 20 A The last paid employment that I had was --
 21 there was that -- do you remember going back through
 22 the e-mails where I had that resume and I sent it and
 23 they said, What time do you want to come for an
 24 interview?
 25 I ended up getting the job there for two

1 days because the place was disgusting and the boss
 2 was just horrible.
 3 I didn't get paid from them, but I got
 4 employed by them. And other than that, the last time
 5 I worked was in -- ended in 2006 for ET Australia.
 6 **Q Did you quit that job after two days**
 7 **because the place was disgusting?**
 8 A It was vile. Okay. They had the -- the
 9 whole place was closed down. The restaurant was
 10 closed down for a period of, like, six months. And
 11 he wanted me to go into this freezer area that had a
 12 dead rat in it and like this thick (indicating) layer
 13 of mold at the bottom. And he wanted me to clean it.
 14 **Q All right.**
 15 A And I was just like, No.
 16 **Q Just checking, did you quit or did he fire**
 17 **you?**
 18 A No, I definitely walked out of that one,
 19 hands up.
 20 **Q Okay. I'm going to do one more document I**
 21 **have, quickly.**
 22 **(Exhibit 21 marked.)**
 23 **Q (BY MS. MENNINGER) I'll show you**
 24 **Defendant's Exhibit 21, another composite exhibit.**
 25 **Do you recognize the to and froms on this e-mail?**

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1 A To Sharon Churcher from myself, yes.

2 **Q And this is the Sharon Churcher from Mail**

3 **On Sunday we were discussing earlier?**

4 A That's correct.

5 **Q And these are from February of 2011,**

6 **correct?**

7 A Yes.

8 **Q Okay.**

9 A I mean, it's just assuming that we're not

10 looking at Australian backwards dates.

11 **Q Okay. Well, a few pages back, where it**

12 **says 2/19/2011.**

13 A Oh, yeah, yeah.

14 **Q All right. If I could direct your**

15 **attention to one of the pages, it's 3676 in the lower**

16 **right-hand corner.**

17 A 3676.

18 **Q Now, these are in sequential order.**

19 **They're not in Bates stamp order so you might have to**

20 **look at the dates on the top to find one that's**

21 **February 19th of 2011.**

22 THE DEPONENT: Do you know which page it

23 is?

24 MR. EDWARDS: Well --

25 MS. MENNINGER: It's almost in the middle.

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1 MR. EDWARDS: It's like what she's saying

2 is that --

3 MS. MENNINGER: If you look at the date at

4 the top --

5 MR. EDWARDS: If you look at the top it

6 says 2/19/2011. That's not it. It's like half a

7 page. Keep going.

8 A 2/13, 2/17, 2/18, 2/19 -- 2/19/2011.

9 **Q (BY MS. MENNINGER) If it says 3676 in the**

10 **lower right-hand corner?**

11 A Yes.

12 **Q Okay. Is that an e-mail that you sent to**

13 **Sharon Churcher in response to an e-mail that Sharon**

14 **Churcher sent to you?**

15 A To Sharon Churcher from Jenna, Subject

16 R-E, received, yes.

17 I tried to call the line was busy. Could

18 you call concerning the question you asked?

19 **Q All right. And that was in response to an**

20 **e-mail just below it you received from Sharon**

21 **Churcher, correct?**

22 A Yes.

23 **Q And what did Sharon Churcher write to you**

24 **on February 19th of 2011?**

25 A Do you know a [REDACTED]?

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1 Supposedly JE purchased her at age 14 from her

2 family.

3 **Q Okay. And then you asked her to call to**

4 **discuss that, correct?**

5 A I tried to call. The line was busy.

6 Could you call concerning the question you asked?

7 **Q Right.**

8 A Yes.

9 **Q All right. Defendant's Exhibit 22.**

10 **(Exhibit 22 marked.)**

11 THE DEPONENT: Thank you.

12 **Q (BY MS. MENNINGER) Okay. Do you**

13 **recognize these series of e-mails?**

14 A So far. I mean, it's definitely from me

15 to her. Or actually, Michael Thomas is the

16 photographer that worked with her, just to be clear.

17 **Q And is she one of the two -- the**

18 **recipients of the first-page e-mail? You and she**

19 **received an e-mail from Michael Thomas; is that**

20 **right?**

21 A Yes.

22 **Q Okay.**

23 MR. EDWARDS: I think she wants you to

24 look and make sure you recognize them.

25 **Q (BY MS. MENNINGER) Yeah, do you recognize**

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1 **the document, the e-mails?**

2 A Like I said, these are back in 2011, but

3 it's from my e-mail address. I recognize that. I

4 recognize Sharon's name and I recognize Michael

5 Thomas.

6 **Q Do you have any reason to doubt that the**

7 **e-mails from March of 2011 --**

8 A I don't have any --

9 **Q -- from yourself and Ms. Churcher are**

10 **accurately reflected from the documents taken from**

11 **your computer here?**

12 A I have no reason to doubt that.

13 **Q Okay.**

14 **(Exhibit 23 marked.)**

15 **Q (BY MS. MENNINGER) Defendant's**

16 **Exhibit 23. Again, e-mails between your e-mail**

17 **address and Sharon Churcher from May of 2011.**

18 **Do you recognize your e-mail address?**

19 A Yes.

20 **Q And Sharon Churcher's e-mail address?**

21 A Yes.

22 **Q And you're signing your e-mails to her,**

23 **Much love, XOXO Jenna. And she's signing her e-mails**

24 **to you, Love Shaza, correct?**

25 A Correct.

1 **Q And Shaza is a name that you call her?**
 2 A In Australia we kind of shorten the names
 3 of people and put z-a on the end, so yes.
 4 **Q So she became Shaza?**
 5 A She became Shaza, correct.
 6 **Q And do you recall having e-mail**
 7 **communications with her in which you referred to her**
 8 **as Shaza and --**
 9 A Yes.
 10 **Q -- she referred to herself as Shaza?**
 11 A She's the same person we're talking about,
 12 yes.
 13 **Q All right. So it's coming from her e-mail**
 14 **address as Sharon Churcher, right?**
 15 A Yes.
 16 **Q All right. And I think the last --**
 17 MR. EDWARDS: Are you at a stopping point?
 18 MS. MENNINGER: Almost.
 19 MR. EDWARDS: Okay. Okay. I just have to
 20 a make a quick call, but I can wait a while so --
 21 MS. MENNINGER: I understand. Almost
 22 done.
 23 MR. EDWARDS: Okay.
 24 (Exhibit 24 marked.)
 25 **Q (BY MS. MENNINGER) This is Exhibit 24,**

1 phrase sex trafficked as that is a heads up about the
 2 book revealing more than be printed.
 3 **Q All right. So is Sharon Churcher writing**
 4 **to you about -- actually, it's cc'd to Brad, correct?**
 5 A Yes.
 6 **Q And I only use Brad, not his last name**
 7 **because it's brad@pathtojustice.com, correct?**
 8 A Yes.
 9 **Q All right. And that's Brad Edwards, who**
 10 **is sitting here, right?**
 11 A Yes.
 12 **Q All right. And so in the e-mail from**
 13 **Sharon Churcher to you regarding whether or not you**
 14 **should let Vanity Fair buy your picture, she's also**
 15 **recommending in the last line that you should have**
 16 **Brad use the phrase sex trafficked, correct?**
 17 A If a statement is made, yes. I don't
 18 think Vanity Fair ever did, anyway.
 19 **Q And the picture that they're talking about**
 20 **there is the one with [REDACTED], correct?**
 21 A That's -- yeah, the big one.
 22 **Q The one that was previously sold?**
 23 A Yes.
 24 **Q And Paulo Silva was syndicating that one,**
 25 **correct?**

1 **e-mails between yourself and Sharon Churcher from**
 2 **June of 2011?**
 3 A Um-hum. Yes, sorry.
 4 **Q And, again, Shaza and Jenna, Shaza, Jenna,**
 5 **Jenna, Shaza, right?**
 6 A Yes.
 7 **Q And at the bottom of this first page, is**
 8 **Sharon Churcher giving you advice regarding the**
 9 **purchase by Vanity Fair [REDACTED]**
 10 **[REDACTED]**
 11 A May I have time to read it, please?
 12 **Q Please.**
 13 A Are we talking about the very bottom one
 14 or the one in the kind of middle bottom?
 15 **Q The very bottom one.**
 16 A I would let VF buy your picture via Brad.
 17 The big gamble would be to let him also give them a
 18 statement.
 19 **Q Right.**
 20 A (Deponent perused document, sotto voce.)
 21 The reason this is a gamble is Jeffrey
 22 knows some of the most powerful people in publishing
 23 and, once altered, will inevitably try to scare off
 24 potential buyers. But the upside is it should help
 25 you get a good agent. I would have Brad use the

1 A Yes. Yeah.
 2 **Q And on that second page there's a**
 3 **redaction. Who is -- who is in that redaction?**
 4 A I have no idea.
 5 **Q You don't know?**
 6 A No, I don't know.
 7 **Q So who are the two world's most respected**
 8 **politicians? [REDACTED] and who?**
 9 A I don't know.
 10 **Q Do you recall ever telling Sharon Churcher**
 11 **that you were trafficked to two of the world's most**
 12 **respected politicians, [REDACTED] and somebody**
 13 **else?**
 14 MR. EDWARDS: Object to form.
 15 A Is that her wording? This is from her.
 16 So this is her wording.
 17 **Q (BY MS. MENNINGER) Right.**
 18 A If she considered them to be the world's
 19 most respected politicians, that would be her
 20 opinion, not mine.
 21 **Q Okay. But you received this e-mail and**
 22 **responded to it, correct?**
 23 A Is the top one above that what I responded
 24 to? Sorry. It just confuses me because it goes
 25 upwards, doesn't it, not downwards. We're not

1 reading chronologically down, are we?
 2 **Q You can probably look at the dates and**
 3 **figure it out. I need you to do that, not me?**
 4 A Okay the 30th of the fifth, 31st of the
 5 fifth, 6th of the first. Right. So I still don't
 6 know who she's talking about there.
 7 **Q You don't know if you received this**
 8 **e-mail?**
 9 A No, I received this e-mail, obviously, but
 10 I don't know who's redacted there.
 11 **Q Okay. And in the e-mail that you**
 12 **responded to, you're talking about -- you used**
 13 **correct?**
 14 A It does concern me what they could want to
 15 write about me considering tha walked
 16 into VF and threatened them not to write sex
 17 trafficking articles about his good friend JE.
 18 **Q Right. Does that refresh your memory that**
 19 **when you got this e-mail unredacted was**
 20 **included as well as ?**
 21 MR. EDWARDS: Object to the form.
 22 **Q (BY MS. MENNINGER) In the line referred**
 23 **to as two of the world's most respected politicians?**
 24 A It could be. But, again, I would be
 25 making an assumption because I don't know who that

1 case. How fantastic, Jenna! Have you asked him how
 2 he'd feel about reviving your book? It would be an
 3 incredible shame if the other project lifts your
 4 story, which it could at least somewhat. Jarred is
 5 still very keen to represent you. I'm afraid I
 6 screwed you by steering you to Mimi.
 7 I just had a great weekend in LA on a
 8 celebrity story. Got to go to Rodeo Drive!!!
 9 Much love, Shaza.
 10 Yes.
 11 **Q So she's encouraging you to have David**
 12 **Boies also help you in the book writing department,**
 13 **right?**
 14 MR. EDWARDS: Object to the form.
 15 Mischaracterizes the exhibit.
 16 A Is the question pending?
 17 **Q (BY MS. MENNINGER) Yes.**
 18 A She -- yeah, she encouraged me to -- I
 19 mean, once she saw that, you know, there was more
 20 litigation going on, she thought -- like she says,
 21 How fantastic. And up until recently she's still
 22 been trying to get me to get the book out.
 23 **Q And in May of 2015, do you have -- did you**
 24 **have any active agreement to publish your book?**
 25 A In May of 2015, no. Jarred wanted to do

1 name is.
 2 **Q I don't either.**
 3 A Okay.
 4 **Q Maybe our lawyers can tell us.**
 5 MS. MENNINGER: All right. Last one, and
 6 then you can get your break.
 7 (Exhibit 25 marked.)
 8 **Q (BY MS. MENNINGER) Defendant's**
 9 **Exhibit 25. Again, e-mails to and from yourself and**
 10 **Sharon Churcher, correct?**
 11 A Yes.
 12 **Q And in this e-mail, it's dated 4/12/2015**
 13 **on the first page of this composite e-mail?**
 14 A Yes.
 15 **Q She is encouraging you to do a book,**
 16 **correct?**
 17 A As she has from the beginning, yes.
 18 **Q Right. And she suggested a roman a clef.**
 19 **Do you know what that means?**
 20 A No.
 21 **Q On the third page back, she wrote you to**
 22 **compliment you about David Boies taking your case,**
 23 **correct?**
 24 A (Deponent perused document sotto voce.)
 25 Just reading about David Boies taking your

1 something again, but his only thing was, he wanted
 2 Sharon to be in on it as like a ghostwriter. And I
 3 said, Look, Sharon is all well and good, but I don't
 4 want a journalist, you know, as they can twist things
 5 around writing my story.
 6 So he was like, Well, I'm sorry, I don't
 7 want to work with you then. And I said, Well, that's
 8 fine. No problem.
 9 **Q Do you, as you sit here today, have any**
 10 **agreement to publish your story in written form?**
 11 A No, we have no agreement.
 12 **Q Do you have an agreement for anyone else**
 13 **to write your story?**
 14 A No.
 15 **Q Have you got any ghostwriter in the book?**
 16 A Besides Sandra, who I didn't like, no.
 17 MS. MENNINGER: All right. I think now is
 18 a good time for a break. And then --
 19 MR. EDWARDS: Okay.
 20 THE VIDEOGRAPHER: We are off the record
 21 at 4:12.
 22 (Recess taken from 4:12 p.m. to 4:22 p.m.)
 23 THE VIDEOGRAPHER: We are back on the
 24 record at 4:22.
 25 **Q (BY MS. MENNINGER) When you were**

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1 **e-mailing and speaking with Sharon Churcher in 2011**
 2 **about the Vanity Fair possibly purchasing your**
 3 **photograph --**
 4 A Um-hum.
 5 **Q -- do you recall whether you shared with**
 6 **Sharon Churcher anything that you had discussed with**
 7 **your attorney, Mr. Edwards?**
 8 A In relationship to what? Like, have I
 9 identified people to her?
 10 **Q Right.**
 11 A Yes.
 12 **Q Okay. So you -- you identified people to**
 13 **her and you then looped back to her about your**
 14 **conversations with Mr. Edwards, correct?**
 15 MR. EDWARDS: Object to the form.
 16 A I'm sorry, can you rephrase? I don't
 17 understand.
 18 **Q (BY MS. MENNINGER) All right. So you**
 19 **were e-mailing with her --**
 20 A Um-hum.
 21 **Q -- getting her advice about whether or not**
 22 **to sell your [REDACTED] to Vanity Fair?**
 23 A Right.
 24 **Q She asked you to run some information by**
 25 **Brad --**

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1 A Yes.
 2 **Q -- Edwards. And you said that you were**
 3 **going to do that?**
 4 A Um-hum.
 5 **Q And then you spoke to Mr. Edwards,**
 6 **correct?**
 7 A I don't know if I spoke to him or if I
 8 e-mailed him.
 9 **Q Okay. And then did you report back to**
 10 **Sharon Churcher what you had discussed with**
 11 **Mr. Edwards?**
 12 A I'm not too sure. Like I said, going back
 13 to the 2011 e-mails, look at this pile here. It's
 14 impossible for me to know.
 15 **Q So you were having a lot of communications**
 16 **with Sharon Churcher in 2011?**
 17 A In 2011, yes.
 18 **Q All right. And Mr. Edwards was your**
 19 **attorney in 2011, correct?**
 20 A Yes.
 21 **Q And did you ever have Sharon Churcher**
 22 **draft for you e-mail to send to Mr. Edwards?**
 23 A Yes, I believe -- I believe she did.
 24 **Q And why did she draft e-mails for you to**
 25 **send to Mr. Edwards?**

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1 A I believe there was -- and this is just
 2 going off my recollection.
 3 **Q Um-hum.**
 4 A I believe there was a time when she was --
 5 oh, God, I can't remember. I really can't remember
 6 and don't want to say anything without looking at
 7 that exact e-mail. Do you have it to show me?
 8 **Q Well, I'm sure it's probably in there but**
 9 **I don't want to take the time to look for it now.**
 10 A Okay.
 11 **Q So I understand you're just repeating what**
 12 **you recall from your memory.**
 13 A Yes.
 14 **Q And it may not be accurate because you're**
 15 **not looking at the document. I've got that caveat.**
 16 **What do you recall, just as you're sitting**
 17 **there?**
 18 A I know there was e-mails that Sharon sent
 19 to me suggesting to say to Brad Edwards, I know that.
 20 I don't remember or recall exactly what was in those
 21 statements.
 22 **Q Okay. And did you send those e-mails to**
 23 **Mr. Edwards, as you recall today?**
 24 A I don't know. I'm sorry.
 25 **Q And do you know if you went back to Sharon**

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1 **Churcher and told her about the conversations or**
 2 **e-mails you had with Mr. Edwards?**
 3 A Some of them, I'm sure, yes.
 4 **Q Because you were in fairly regular contact**
 5 **with Sharon Churcher at that time, correct?**
 6 A Right, at that time.
 7 **Q All right. I want to introduce to you**
 8 **Defendant's Exhibit 26.**
 9 **(Exhibit 26 marked.)**
 10 **Q (BY MS. MENNINGER) Have you seen this**
 11 **document before?**
 12 A I don't know if I've seen this specific
 13 document before, but I've seen something close to it,
 14 I think.
 15 **Q All right. Do you see the date on the**
 16 **document?**
 17 A March 10th, 2011.
 18 **Q March 9th?**
 19 A I see March 10th, sorry.
 20 **Q Hmm.**
 21 A London, March 10th, 2011.
 22 MR. EDWARDS: Both dates are there.
 23 MS. MENNINGER: I'm sure they are. I'm
 24 just not seeing the one that you're seeing.
 25 THE DEPONENT: Oh, I'm sorry.

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1 MS. MENNINGER: That's okay.
 2 THE DEPONENT: Yeah. Sorry about that.
 3 MS. MENNINGER: Okay.
 4 MR. EDWARDS: One is right on top of the
 5 other.
 6 **Q (BY MS. MENNINGER) I don't doubt you. I**
 7 **was just looking for it.**
 8 A Okay.
 9 **Q All right. So after the word London,**
 10 **March 10th, 2011, correct?**
 11 A Correct.
 12 **Q And above that is a title, Statement on**
 13 **behalf of Ghislaine Maxwell, right?**
 14 A Yes.
 15 **Q By Devonshires Solicitors, PRNE, correct?**
 16 A Correct.
 17 **Q And then Wednesday, March 9th, 2011,**
 18 **correct?**
 19 A Correct.
 20 **Q And you understand that March 9th or**
 21 **March 10th, 2011 is roughly the time your original**
 22 **stories were published in the press --**
 23 A Correct.
 24 **Q -- internationally, correct?**
 25 A Correct.

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1 **Q And this statement issued by Ghislaine**
 2 **Maxwell or issued by Devonshires Solicitors on her**
 3 **behalf denied allegations about her that have**
 4 **appeared recently in the media, correct?**
 5 A Correct.
 6 **Q It says, These allegations are all**
 7 **entirely false, correct?**
 8 **Did I read that properly?**
 9 A Ghislaine Maxwell denies the various
 10 allegations about her -- oh, yeah, right -- yeah,
 11 right below that. These allegations are entirely
 12 false.
 13 **Q All right. In 2011, were you aware that**
 14 **Ghislaine Maxwell issued a statement denying the**
 15 **allegations about her that had appeared in the media?**
 16 A I'm not too sure what I recall from 2011
 17 about Ghislaine Maxwell denying it. I know that she
 18 denied it recently in 2015. I know that for a fact.
 19 **Q So you don't know whether she denied it in**
 20 **2011?**
 21 A I can't recall back to 2011, if I do
 22 remember that.
 23 **Q And you don't know whether she put out a**
 24 **press statement that said these allegations are all**
 25 **entirely false, correct?**

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1 A It doesn't surprise me, but I don't
 2 remember reading this. I know that, you know, there
 3 was a lot of stories in press going on and a lot of
 4 them I decided I just didn't want to read. There was
 5 a lot of stuff in there that just, I didn't want to
 6 go through.
 7 **Q Okay. Were you harmed on March 10th or**
 8 **March 11th, 2011 by the issuance of a statement on**
 9 **behalf of Ghislaine Maxwell?**
 10 A I am harmed by Ghislaine Maxwell denying
 11 anything that has ever happened between us, whether
 12 it's in 2002 or 2011 or 2015. I think that she knows
 13 what she did, and she should be held accountable for
 14 them. And not only has she hurt me once, but she's
 15 hurt me apparently twice and now three times.
 16 **Q So on March 11th, 2011, say, how were you**
 17 **harmed by the issuance of this press statement?**
 18 A She's denied that she had any involvement
 19 in the procuring of me and other young girls.
 20 **Q Um-hum.**
 21 A And she tries to make herself look like
 22 she had no partake in it.
 23 **Q Did you suffer any physical symptoms on**
 24 **March 11th, 2011 after this statement was issued, as**
 25 **a consequence of this statement being issued?**

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1 A Not being able to remember reading this in
 2 2011, it's hard to say. But it's the same thing that
 3 I'm going through right now. I mean, she's denied it
 4 again. And it is painful. It's physically painful.
 5 I am taking medication to help me deal with this.
 6 And --
 7 **Q Okay. I'm just limiting you right now to**
 8 **March of 2011.**
 9 MR. EDWARDS: I would just ask that she's
 10 able to finish her answer, though, please.
 11 MS. MENNINGER: Well, the answer is
 12 nonresponsive, so --
 13 MR. EDWARDS: In your opinion it's not
 14 responsive.
 15 **Q (BY MS. MENNINGER) I want you to**
 16 **understand that the question is related to any**
 17 **physical symptoms you suffered in March of 2011 as a**
 18 **consequence of Defendant's Exhibit 26 being issued.**
 19 A If I would have seen this in March 10th,
 20 2011, this would have been harmful to me.
 21 **Q Okay. Do you recall, as you sit here**
 22 **today, experiencing any physical symptoms as a**
 23 **consequence of Defendant's Exhibit 26 being issued to**
 24 **the press?**
 25 MR. EDWARDS: Objection. Asked and

1 answered. Lacks predicate.
 2 A I have been suffering from Ghislaine
 3 Maxwell and Jeffrey Epstein since the summer of 2000.
 4 So hearing again in 2011 that she's denied it, of
 5 course, it's going to hurt me.
 6 Did I hear about this in 2011? I can't
 7 tell you I honestly have.
 8 In 2015 is when I know that she denied it.
 9 And again, I haven't stopped suffering from the
 10 repercussions that they put me through.
 11 **Q (BY MS. MENNINGER) And I'm asking you to**
 12 **separate, if you can, any symptoms that you**
 13 **experienced anew in March of 2015 -- I mean, excuse**
 14 **me, March of 2011, as a consequence of this statement**
 15 **being issued, which I believe you said you don't**
 16 **recall seeing at the time; is that fair?**
 17 A But you're asking me now about 2015?
 18 **Q Nope. March of 2011. Sorry, I misspoke**
 19 **there.**
 20 A You're still on 2011?
 21 **Q Yes. Did you start taking any new**
 22 **medications in March of 2011?**
 23 **Let me ask you that.**
 24 A I've been taking medication to control my
 25 [REDACTED] since 2002.

1 **Q Okay. So did you take any new medications**
 2 **or any additional amounts of medications in March of**
 3 **2011?**
 4 A I have been taking the same medication
 5 since 2002.
 6 **Q Okay.**
 7 A And that's due to [REDACTED]
 8 caused from the pain that I suffered at the hands of
 9 Ghislaine Maxwell and Jeffrey Epstein.
 10 **Q Did you -- do you recall any neighbors or**
 11 **other moms at the school or anybody in 2011**
 12 **referencing to you in any way the fact that Ghislaine**
 13 **Maxwell had issued a denial of the allegations about**
 14 **her that had been published in the media in March of**
 15 **2011?**
 16 A No. I didn't speak to any -- I didn't
 17 speak to any moms about what I had gone through. I
 18 mean, when it came out in the press, I don't think
 19 any -- like, Australians don't pay attention to news,
 20 number one.
 21 Number two, the first time that my friends
 22 contacted me they were shocked. And this was, I
 23 believe in -- when the press picked it up again, I
 24 think, was 2014/2015. And I got a whole bunch of
 25 like Facebook texts from them saying, Oh, my God, I

1 can't believe you've been through this. I never
 2 knew. I'm so sorry. You know, that kind of stuff.
 3 So they never -- I never spoke to anybody about this
 4 except for my husband.
 5 **Q All right. So the first time you recall**
 6 **any sort of people in your community referencing**
 7 **things to you is when the press picked up on it in**
 8 **2014 or 2015?**
 9 A Yeah, I think it may be end of 2014, early
 10 2015.
 11 **Q All right. And so in March of 2011 you**
 12 **don't recall any neighbors or anybody saying anything**
 13 **to you about this?**
 14 A No, I don't recall.
 15 **Q Did anyone tell you in March of 2011 about**
 16 **Defendant's Exhibit 26, the statement on behalf of**
 17 **Ghislaine Maxwell?**
 18 A No, otherwise I would have been able to
 19 recall it.
 20 **Q Okay. Do you remember anyone in 2011**
 21 **ridiculing you because of Defendant's Exhibit 26?**
 22 A Well, because nobody knew me as Virginia,
 23 everybody knows me as Jenna, no one probably put two
 24 and two together. And like I told you, I didn't tell
 25 anybody. So there was nobody there to ridicule me in

1 2011 over this.
 2 **Q Where were you living in 2011 when Shaza**
 3 **came to see you --**
 4 A Oh, [REDACTED].
 5 **Q Do you recall applying for any job in or**
 6 **around 2011 and someone referencing Defendant's**
 7 **Exhibit 26 and denying you a job?**
 8 A I don't -- I don't think I applied for a
 9 job in 2011.
 10 **Q Okay. Did you go see a doctor and talk to**
 11 **any doctor about Defendant's Exhibit 26?**
 12 A Not about this. Not about this paper
 13 right here. But I have talked to doctors about my
 14 abuse at the hands of Ghislaine and Jeffrey.
 15 **Q Have you talked to a doctor about any**
 16 **statements in the press made by Ghislaine Maxwell?**
 17 A Recent statements, yes.
 18 **Q Which doctor did you speak to about that?**
 19 A Her name is Judith Lightfoot.
 20 **Q And where is she?**
 21 A She's in Australia.
 22 **Q Where in Australia?**
 23 A She's in Sydney, but we do phone
 24 conversations.
 25 **Q Have you ever met her in person?**

1 A Yes.

2 **Q When?**

3 A In 2011.

4 **Q All right. And is she affiliated with an**

5 **office or a hospital or what?**

6 A She's a psychiatrist.

7 **Q All right. Have you seen her in person**

8 **since 2011?**

9 A No, because I've lived so far away and

10 she's kind of the only person that -- like, I've seen

11 a lot of doctors. And I can honestly tell you --

12 it's really hard for them to break down the walls and

13 be comfortable enough to talk to them about this

14 stuff. Judith is different. She's somebody that I

15 feel I can trust. She's 76 and she's just a very

16 lovely lady.

17 And she offers me other ways to deal with

18 my pain and suffering. And I continue to see her

19 over the phone because I can't see her in person.

20 **Q Do you recall ever discussing with her**

21 **Defendant's Exhibit 26?**

22 A I can't recall ever seeing this exhibit.

23 So --

24 **Q Okay.**

25 **(Exhibit 27 marked.)**

1 **Q (BY MS. MENNINGER) I'm going to give you**

2 **Defendant's Exhibit 27.**

3 A Yes.

4 **Q All right. Have you seen this document**

5 **before?**

6 A Yes.

7 **Q And what do you understand it to be?**

8 A [REDACTED] sounds like a PR, if

9 I'm not right -- if I'm not wrong. Sent -- or

10 subject is Ghislaine Maxwell. I don't know [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 It says: To whom it may concern, Please

14 find attached credible statement on behalf of

15 Ms. Maxwell.

16 And then it goes on, to hear about that

17 she is saying: Each time the story is retold it

18 changes with new salacious details about public

19 figures and world leaders and now it is alleged by

20 Ms. Roberts that [REDACTED] is involved in

21 having sexual relations with her, which he denies.

22 Ms. Roberts' claims are obvious lies and

23 should be treated as such and not publicized as news,

24 as they are defamatory. Ghislaine Maxwell's original

25 response to the lies and defamatory claims remains

1 the same. Maxwell strongly denies -- excuse me.

2 Excuse me -- strongly denies allegations of an

3 unsavory nature, which have appeared in the British

4 press and elsewhere and reserves her right to seek

5 redress at the repetition of such old defamatory

6 claims.

7 **Q All right. Have you seen this statement**

8 **before?**

9 A I've seen it recently, yes.

10 **Q All right. What -- have you discussed**

11 **this statement with Ms. Lightfoot? I don't know if**

12 **she's a doctor or what.**

13 A Psychiatrist, yeah.

14 **Q Is she an MD?**

15 A I don't know what her levels of credential

16 are. I'm sure she is.

17 **Q Okay. When is the first time that you saw**

18 **the statement?**

19 A This full statement I have only seen

20 through discovery. The original statement that I saw

21 in the press was, Ms. Roberts' claims are obvious

22 lies and so on, so forth. I don't remember seeing

23 this in the press.

24 **Q Okay. So the part that you remember**

25 **seeing in the press is Ms. Roberts' claims are**

1 **obvious lies?**

2 A Yes.

3 **Q Anything else about this?**

4 A I can't remember what else she printed in

5 the press. It's a very horrible thing for her to do,

6 turn around and call me a liar after everything that

7 she knows she's done. And I didn't expect her to

8 come out and be truthful.

9 Jeffrey Epstein hasn't even issued a

10 statement.

11 **Q Sorry. I'm sorry if you misunderstood my**

12 **question.**

13 A Yes.

14 **Q Was there anything else within this**

15 **statement that you recall seeing in the press besides**

16 **the line, Ms. Roberts' claims are obvious lies?**

17 A Without saying 100 percent, I think that

18 the original allegations are not new and have been

19 fully responded to be shown to be untrue. I don't

20 know if that's in the press or not, but I've read

21 this before.

22 So I don't know if I'm confusing this with

23 what I've read out of this or what I've read in the

24 press. The main thing is, I know she called me a

25 liar, and that's what she publicized.

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1 **Q And when you say she called you a liar,**
 2 **that's the Ms. Roberts' claims are obvious lies part?**
 3 A Yes.
 4 **Q Okay. When is the first time that you saw**
 5 **this whole document?**
 6 A I guess when you guys handed it over for
 7 discovery.
 8 **Q Okay. And who showed it to you?**
 9 A It was sent to me by e-mail.
 10 **Q Okay. Just through the course of**
 11 **communicating with your attorneys?**
 12 A Yes.
 13 **Q You've never seen it published?**
 14 A Not this whole e-mail, no.
 15 **Q All right. Did you -- I'm sorry, did you**
 16 **discuss this publication of what you saw in the press**
 17 **with Judith Lightfoot?**
 18 A Yes.
 19 **Q All right. And when did you discuss it**
 20 **with her?**
 21 A When I got back to Australia, Judith and I
 22 started seeing each other again. Before then, I
 23 spoke with a doctor in Colorado about this. His name
 24 is Dr. Olsen. And it was causing me a lot of
 25 distress to have to deal with being called a liar all

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1 over again, when I know I'm standing up doing the
 2 right thing. And the doctor prescribed me
 3 [REDACTED]. And, yeah.
 4 **Q Okay. So my question was, when did you**
 5 **discuss it with Judith Lightfoot?**
 6 **I think I now understand you did that**
 7 **after you returned to Australia in November or so of**
 8 **2015; is that right?**
 9 A I returned to Australia in October, and
 10 that's when I picked up talking to her again.
 11 **Q All right. And you're saying that at**
 12 **another point in time you talked to another doctor,**
 13 **Dr. Olsen, in Colorado, correct?**
 14 A Correct.
 15 **Q And when did you meet with Dr. Olsen?**
 16 A I don't know the first date that I met
 17 with him.
 18 **Q Did you meet with him more than once?**
 19 A I believe so.
 20 **Q And you believe you spoke with him about**
 21 **Ghislaine Maxwell's published statement in the press**
 22 **that Ms. Roberts' claims are obvious lies.**
 23 **That's what you believe you spoke with**
 24 **Dr. Olsen about?**
 25 A I spoke with Dr. Olsen about being called

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1 a liar from the people that abused me.
 2 **Q Okay. Do you recall specifically**
 3 **mentioning to him Ghislaine Maxwell's statement to**
 4 **the press?**
 5 A I mentioned a lot of names to him.
 6 **Q Okay. What new symptoms did you**
 7 **experience following January 2nd, 2015?**
 8 A I think it's one thing to be a victim of
 9 sexual abuse and survive it and come out trying to
 10 tell the world my story, and then another thing for
 11 it to be shut down because these people, Ms. Maxwell
 12 and others are calling me liars (sic).
 13 **Q And I asked you what symptoms had you**
 14 **experienced --**
 15 MR. EDWARDS: She's going to finish her
 16 answer to this question. You cut her off so many
 17 times.
 18 MS. MENNINGER: It has nothing to do with
 19 this.
 20 MR. EDWARDS: It absolutely does. Because
 21 this is a psychological damages claim, and she is
 22 trying to explain to you what those damages are.
 23 **Q (BY MS. MENNINGER) Okay. What are your**
 24 **symptoms that you experienced since January 2nd, 2015**
 25 **that are new?**

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1 A Very strong anxiety attacks, bad panic
 2 attacks. My throat closes up, I can't breathe. I
 3 vomit when I have anxiety attacks. My -- this is
 4 personal, but my sex life has suffered. My marriage
 5 has suffered. Psychologically, it's just hurt me all
 6 over again. I mean, they've hurt me before, and now
 7 they've hurt me again by doing this.
 8 And I felt like I was in the process of
 9 healing before this came out because I had opened up
 10 this wonderful charity called Victims Refuse Silence.
 11 And then my aim was to heal by helping other girls
 12 get out of the situations that I was in before.
 13 And my lawyers were nice enough to help
 14 me. I have this beautiful website where you can
 15 click on in any state and you can find a place. I
 16 have personally called all of them and they will help
 17 you get out of the situation that you're in. They
 18 will get you medical help. They will get you legal
 19 advice. I think I was in the really good process of
 20 healing. And when this came out, it just ruined me
 21 all over again.
 22 **Q (BY MS. MENNINGER) All right. Tell me**
 23 **all of the damages that you claim occurred to you**
 24 **because of Defendant's Exhibit 27.**
 25 A My reputation, my psychological abuse,

1 physical ailments. My marriage has suffered, my
 2 family life has suffered. I'm constantly battling
 3 depression. I feel like I've taken 10 steps forward
 4 and 12 steps back since this all happened.

5 **Q Okay. And by since this all happened, do**
 6 **you mean since January 2nd, 2015?**

7 A That's correct.

8 **Q All right. Have you lost any income since**
 9 **January 2nd, 2015 as a consequence of Defendant's**
 10 **Exhibit 27?**

11 A Well, I believe that my charity that was
 12 going to go forward and help other victims was going
 13 to not only bring in income but also be able to
 14 provide women with shelters and food and assistance
 15 that I wanted to help them with.

16 I haven't been able to get a job or work
 17 or anything like that. You know, financially, my
 18 husband brings home the money for me. But as myself
 19 goes, I couldn't work right now with everything going
 20 on.

21 **Q How much income were you making prior to**
 22 **December 30th, 2014?**

23 A Well, I've been a stay-at-home mom since
 24 2006.

25 **Q So how much income have you lost as a**

1 **result of Defendant's Exhibit 27?**

2 A I could only imagine, you know, being the
 3 head of a corporation, a charity, I would be earning
 4 a decent wage. It's hard to say how much I would be
 5 earning because it is a non for-profit.

6 But because of these statements telling
 7 everybody in the world that I'm a liar, my charity
 8 has not been able to take off. And as a consequence
 9 of that, I have missed out on the results of not
 10 being able to go forward with it.

11 **Q Okay. Have you applied for any job that**
 12 **you've been denied since January 2nd, 2015?**

13 A I haven't been denied a job. I haven't --
 14 I've just -- I thought about applying for jobs, but I
 15 mean, the second that you Google my name, people are
 16 going to know exactly who I am. And these days,
 17 employers Google everything, and it makes me fearful
 18 that if I do go apply for a job, which I would like
 19 to. I mean, my kids are all at school now. I'd like
 20 to get back into the work force.

21 But I'm afraid if I do, my past is going
 22 to stop me from being able to do that. No one wants
 23 to hire a sex slave.

24 **Q How has your reputation been harmed by**
 25 **Defendant's Exhibit 27?**

1 A Well, number one, my charity. I mean,
 2 that's -- that was my voice for other people to get
 3 help. And I don't think that people want to get help
 4 from somebody who's being called a liar in the press,
 5 somebody who is claiming to be a victim that isn't.
 6 I mean, I wouldn't want to get help from somebody who
 7 did that, you know.

8 And I know when I introduce myself to
 9 people these days, I don't introduce myself as
 10 Virginia anymore. I introduce myself as another name
 11 because I'm afraid that if people read papers or if
 12 people Google or find out who I am that they'll think
 13 differently of me.

14 **Q What do you introduce yourself as?**

15 A I tell everybody my name is Jenna.

16 **Q In what country or location has your**
 17 **reputation been damaged as a consequence of**
 18 **Defendant's Exhibit 27?**

19 A Considering this is worldwide publication,
 20 I would say England, America, Australia. You
 21 know, friends in Australia were seeing my face on
 22 national TV. Like I said, I can't remember if it was
 23 2014 or 2015. And I have since not been in contact
 24 with those friends. I thanked them for their
 25 sympathies, but it's not something I want people to

1 know about. You know, especially people close to me.

2 I mean, I want to go out there and I want
 3 to help other victims. But being called a liar and
 4 people having to sit there and second guess if I'm
 5 telling the truth or not doesn't really give me much
 6 incentive to want to make friends.

7 **Q Did anyone in Penrose, Colorado approach**
 8 **you and mention Ghislaine Maxwell's name?**

9 A We have reporters at our door.

10 **Q Did anyone in Penrose, Colorado approach**
 11 **you and mention Ghislaine Maxwell's name?**

12 A What, reporters? Yes, plenty of them.

13 **Q Did anyone who lives in Penrose, Colorado**
 14 **approach you and mention Ghislaine Maxwell's name?**

15 A Have you ever been to Penrose? It's --
 16 it's in the middle of nowhere. So you really -- I
 17 didn't have friends in Penrose. There was nobody
 18 that I knew there.

19 **Q All right. And which reporters mentioned**
 20 **you and Maxwell's name to you in Penrose, Colorado?**

21 A We have reporters chasing us down the
 22 street, in car parks, taking my kids to the doctor's,
 23 going to the grocery store. You know, asking me all
 24 kinds of questions about it. And I didn't talk to
 25 any journalists or reporters about it.

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1 **Q And what do you recall any reporter saying**
 2 **to you that included the name Ghislaine Maxwell?**
 3 A Asking me -- I don't remember what they
 4 asked me, to be honest. There was regarding
 5 Ghislaine and [REDACTED] and Jeffrey Epstein. I
 6 mean, it was an array -- you know how reporters can
 7 be when they're hashing at you.
 8 **Q Okay. So no one in Penrose, Colorado who**
 9 **lived there mentioned Ghislaine Maxwell by name to**
 10 **you?**
 11 A Besides reporters?
 12 **Q Right. People who live in Penrose,**
 13 **Colorado.**
 14 A Right. I didn't know anyone in Penrose,
 15 except for my mom.
 16 **Q Okay. Now, in March or April of 2015 did**
 17 **you fly to New York?**
 18 A I'm sorry, what date?
 19 **Q March or April of 2015, did you fly to New**
 20 **York?**
 21 A It's a possibility.
 22 **Q Did you stay at the Ritz-Carlton?**
 23 A It's definitely a possibility.
 24 **Q Were you there with Mr. Edwards and**
 25 **Mr. Cassell and Sigrid McCawley?**

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1 A I've been to New York quite a few times.
 2 So I'd have to refresh my memory. But I have been to
 3 New York with Brad Edwards and Paul Cassell and
 4 Sigrid McCawley.
 5 **Q Was that after January 2nd, 2015?**
 6 A Definitely could be.
 7 **Q Did you give an interview to ABC News on**
 8 **camera?**
 9 A I did.
 10 **Q And that was after January 2nd, 2015?**
 11 A I did.
 12 **Q Did you give an interview to Good Morning**
 13 **America?**
 14 A No.
 15 **Q All right. Did you correspond at all with**
 16 **Good Morning America about the publication of your**
 17 **story?**
 18 A I can't remember if ABC and Good Morning
 19 America wanted to do something together. I can't --
 20 all I know is I was interviewed by one person at ABC.
 21 I never was interviewed by anyone from Good Morning
 22 America. Maybe they were going to show the same
 23 airing in the same show, but powers that be, of
 24 course, wouldn't let it go forward.
 25 **Q Did you give a lecture to the Human**

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1 **Trafficking Coalition sometime after January 2nd,**
 2 **2015?**
 3 A I did give -- I did go for a speaking
 4 engagement. I don't remember when.
 5 **Q Was there any speaking engagement you had**
 6 **booked that was canceled after January 2nd, 2015?**
 7 A I can't remember off the top of my head.
 8 **Q All right. You founded Victims Refuse**
 9 **Silence in February of 2014, correct?**
 10 A It was -- it was a process because,
 11 obviously, you have to go through all the bylaws and
 12 everything. I think we started it in October of
 13 2014, but it wasn't official until January, I think.
 14 **Q Okay. So in the period it was in**
 15 **operations before January 2nd, 2015, had you gotten**
 16 **any -- had you been paid any salary by Victims Refuse**
 17 **Silence?**
 18 A No, I hadn't.
 19 **Q Had --**
 20 A I mean, it was just up and running. So
 21 there was no --
 22 **Q Had any contributions been made to Victims**
 23 **Refuse Silence before January 2nd, 2015?**
 24 A I can't recall. You know, we've only had
 25 a few contributions. I don't know what dates they

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1 were put in.
 2 **Q Has anyone else called you a liar in the**
 3 **press?**
 4 A Yes.
 5 **Q Who?**
 6 A [REDACTED].
 7 **Q Anyone else?**
 8 A Ghislaine Maxwell, obviously.
 9 **Q Anyone else?**
 10 A Not that I know of.
 11 **Q Has anyone else publicly denied your**
 12 **allegations?**
 13 A From what Ghislaine Maxwell said?
 14 **Q Have you seen any press in which another**
 15 **person has denied your allegations?**
 16 MR. EDWARDS: Objection. Vague.
 17 A I've seen allegations denied by
 18 Ms. Maxwell. And I've seen the allegations denied by
 19 [REDACTED].
 20 **Q (BY MS. MENNINGER) And [REDACTED]**
 21 **actually went on TV and called you a serial liar,**
 22 **correct?**
 23 A Very correct.
 24 **Q You saw that, correct?**
 25 A Yes.

1 **Q And that hurt your feelings?**
 2 A Badly.
 3 **Q** [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 MR. EDWARDS: Form.
 9 A [REDACTED]
 10 **Q (BY MS. MENNINGER) How do you know which**
 11 **harm you've suffered is attributable to Ghislaine**
 12 **Maxwell's denial versus [REDACTED]**
 13 [REDACTED]
 14 A Ghislaine Maxwell brought me into the sex
 15 trafficking industry. She's the one who abused me on
 16 a regular basis. She's the one that procured me,
 17 told me what to do, trained me as a sex slave, abused
 18 me physically, abused me mentally.
 19 She's the one who I believe, in my heart
 20 of hearts, deserves to come forward and have justice
 21 happen to her more than anybody. Being a woman, it's
 22 disgusting.
 23 **Q So you cannot delineate what harm you have**
 24 **suffered in terms of all of the psychological damage**
 25 **you just disclosed?**

1 A Oh, of course.
 2 **Q -- if that is attributable to Ghislaine**
 3 **Maxwell's statement on January 2nd versus [REDACTED]**
 4 **[REDACTED] calling you a serial liar on Good Morning**
 5 **America?**
 6 A Of course, it all hurts. Okay? [REDACTED]
 7 [REDACTED]
 8 [REDACTED] Of course those hurt. It
 9 doesn't feel good to have people who have done
 10 something to you deny something that's happened, when
 11 I'm actually brave enough to come forward and talk
 12 about it.
 13 What hurts me the worst is that Ghislaine
 14 Maxwell brought me into this. Not only has she hurt
 15 me once, but she's hurt me twice coming forward and
 16 saying, This is not true, this is categorically
 17 untrue and obvious lies.
 18 That to me is a stick in the mud and that
 19 to me is what caused the most harm to me.
 20 **Q Okay. And so can you point to any person**
 21 **who has referenced Ghislaine Maxwell's denial in the**
 22 **press or to your face or anywhere?**
 23 A Can I point to a person?
 24 **Q Can you point to any time that someone has**
 25 **referenced Ghislaine Maxwell's denial to you in any**

1 **context?**
 2 MR. EDWARDS: Object to the form of the
 3 question.
 4 A Can I point to a person -- I'm sorry. I
 5 don't understand. Can you rephrase it for me --
 6 **Q (BY MS. MENNINGER) All right.**
 7 A -- so I can understand what you mean?
 8 **Q Where you live in Australia now, has**
 9 **anyone referenced the name Ghislaine Maxwell to you?**
 10 A After all of the news hits, after the
 11 press hits in 2015 and, you know, everyone is calling
 12 me a liar, all of my friends in Australia called me
 13 and talked to me and said, I can't believe this. I
 14 can't believe what you went through.
 15 That was very embarrassing for something
 16 that I tried to keep separate from my other life
 17 where I would like to help victims. I didn't want
 18 the friends of my kids parents knowing about that
 19 stuff. You know, and of course they all felt sorry
 20 for me. And you know, like I said. I didn't know
 21 anybody in Penrose. So there's nobody that could
 22 have come up to me and talked to me about it. My
 23 mom.
 24 **Q This question was about Australia, sorry.**
 25 A Oh, sorry, I thought you were talking

1 about pointing out people.
 2 **Q No.**
 3 A Okay, well in Australia, yes, at least a
 4 dozen friends.
 5 **Q They came up and they mentioned Ghislaine**
 6 **Maxwell's denial to the press to you?**
 7 A They couldn't believe what I had been
 8 through and, you know, that these were, you know,
 9 being denied, and they felt sorry for me. And, you
 10 know, it was the whole circumference of things.
 11 **Q So the people in Australia that came up to**
 12 **you had sympathy for you and believed you, correct?**
 13 A Yes.
 14 **Q All right. And when you spoke to**
 15 **Dr. Olsen you recall specifically mentioning**
 16 **Ghislaine Maxwell's press release?**
 17 MR. EDWARDS: Object to the form.
 18 A Yes, I remember mentioning her, as well as
 19 the press release, as well as other press releases.
 20 And the abuse that I had occurred (sic) from the
 21 hands of Jeffrey and Ghislaine.
 22 **Q (BY MS. MENNINGER) Okay. When have you**
 23 **been diagnosed with a mental health condition, first?**
 24 A I don't know. I mean, I've been told that
 25 I've [REDACTED]. You know --

1 **Q When were you first told that?**
 2 A Well, early in -- early in 2003, I believe
 3 is the first time that I was suffering from
 4 [REDACTED] And then my doctor, Judith
 5 Lightfoot, has in 2011 [REDACTED]
 6 [REDACTED]
 7 And, you know, I've recently seen another
 8 doctor who said that I've got the exact same symptoms
 9 that Judith Lightfoot mentioned, which is
 10 [REDACTED]
 11 [REDACTED].
 12 **Q Which doctor is that?**
 13 A You know, I don't honestly know his name.
 14 **Q When did you see this new doctor?**
 15 A Um --
 16 MR. EDWARDS: Sorry. If you're referring
 17 to a doctor that's been sent to you by one of your
 18 lawyers --
 19 THE DEPONENT: Yes.
 20 MR. EDWARDS: -- at this time, I'm
 21 instructing you not to answer.
 22 THE DEPONENT: Okay.
 23 MS. MENNINGER: Wait. What is it? You've
 24 seen a doctor and you're not going to answer what
 25 doctor you've seen?

1 MR. EDWARDS: Sure. If it's a consulting
 2 witness in this case that has seen her at the
 3 direction of an attorney, that has not yet been
 4 disclosed per any expert witness disclosure, then I'm
 5 instructing her not to answer that question.
 6 If that's what you're referring to. I
 7 don't know if that's what you're referring to.
 8 THE DEPONENT: That's what I'm referring
 9 to.
 10 **Q (BY MS. MENNINGER) All right. So you**
 11 **recall seeing Dr. Lightfoot. You recall seeing**
 12 **Dr. Olsen. And you recall seeing a new unnamed**
 13 **doctor recently.**
 14 **Anyone else you've seen since January 2nd,**
 15 **2015?**
 16 A Dr. Olsen, Dr. Lightfoot. Oh,
 17 Dr. Donahue.
 18 **Q Where is Dr. Donahue located?**
 19 A He's in my suburb or he's a suburb next to
 20 me in Australia.
 21 **Q And is that a psychiatric-type doctor, a**
 22 **medical-type doctor?**
 23 A He's medical.
 24 **Q And what did you see him for or her for?**
 25 A I didn't have anybody to basically -- I














1 just got to Australia and Judith Lightfoot was
 2 helping me. [REDACTED]
 3 [REDACTED]
 4 [REDACTED] And I told him the reason.
 5 **Q And this is since you returned to**
 6 **Australia?**
 7 A Correct.
 8 **Q And this is the first time you had seen**
 9 **that doctor?**
 10 A I've seen that doctor twice now.
 11 **Q I'm sorry, what was the name again? I**
 12 **know you already said it, but I just --**
 13 A Dr. Donahue.
 14 **Q Donahue, all right.**
 15 **This doctor that you haven't yet**
 16 **disclosed, where did you see that person? In what**
 17 **country?**
 18 A United States.
 19 **Q And in what state?**
 20 A San Francisco.
 21 **Q And when did you see that doctor?**
 22 A Um, Friday. Last Friday.
 23 **Q And how many times have you seen that**
 24 **doctor?**
 25 A Once. Well, twice actually. I saw him

1 the next day, too.
 2 **Q All right. Did you suffer from anxiety**
 3 **before meeting Jeffrey Epstein?**
 4 A I was never prescribed anything for
 5 anxiety before I met Jeffrey Epstein.
 6 **Q That wasn't my question.**
 7 A Did I --
 8 **Q Were you suffering from anxiety before you**
 9 **met Jeffrey Epstein?**
 10 A I think a person who has gone through as
 11 much trauma as I have in my life would suffer from
 12 quite a few problems. But like I said, I was never
 13 prescribed anything until I met Jeffrey Epstein.
 14 **Q Did you suffer from panic attacks before**
 15 **meeting Jeffrey Epstein?**
 16 A Nowhere near as bad, no.
 17 **Q So you did suffer from [REDACTED].**
 18 **They just weren't as severe; is that what your**
 19 **testimony is?**
 20 A No, what I'm trying to say is I did have
 21 [REDACTED] I did have [REDACTED] I had lived a very
 22 hard life prior to meeting Jeffrey Epstein as well.
 23 After meeting Jeffrey Epstein and
 24 Ghislaine Maxwell, everything escalated. That's when
 25 I started to take Xanax and smoke marijuana to help

1 calm the anxiety and everything down.
 2 **Q Before you met Jeffrey Epstein, had you**
 3 **used any drugs?**
 4 A Sure, yes.
 5 **Q Which drugs had you used prior to meeting**
 6 **Jeffrey Epstein?**
 7 A I smoked pot. I've taken Ecstasy.
 8 **Q Cocaine?**
 9 A Yeah, I would have snorted cocaine,
 10 um-hum.
 11 **Q Did you ever abuse alcohol before meeting**
 12 **Jeffrey Epstein?**
 13 A No, I was -- I wasn't even of age to be
 14 able to buy it. I mean, if there was alcohol at
 15 parties I would have drank it, but I wouldn't say I
 16 abused it.
 17 **Q Okay. Were there ever occasions upon**
 18 **which you were observed to be drunk by other people,**
 19 **prior to meeting Jeffrey Epstein?**
 20 A If you're drinking, the possibility of
 21 getting drunk is always there. I don't -- I can't
 22 recall exact situation where that was the case,
 23 but --
 24 **Q Were you diagnosed as a drug addict prior**
 25 **to meeting Jeffrey Epstein?**

1 A No, I was not diagnosed as a drug addict.
 2 **Q Were you sent to live at a rehabilitation**
 3 **facility because of your use of drugs?**
 4 A No, that was more of a group home. Yes,
 5 it was also a rehab facility, but it wasn't because I
 6 was a drug addict. I wasn't coming off of anything.
 7 **Q Had you abused drugs prior to meeting**
 8 **Jeffrey Epstein?**
 9 A I took drugs. I didn't abuse them, but I
 10 took them.
 11 **Q Okay.**
 12 A Recreationally.
 13 **Q How often do you see Dr. Lightfoot?**
 14 A Once a week every Monday. I've skipped
 15 this week because I've been over here and it's
 16 expensive to call back home right now, unless you
 17 FaceTime, but --
 18 **Q Has Dr. Lightfoot recommended that you see**
 19 **a treating doctor in person?**
 20 A No, she's -- she knows my history pretty
 21 well. And she's a very wonderful woman and I
 22 honestly wouldn't -- Dr. Donahue wants me to go see
 23 another psychiatrist in person, but I prefer to stay
 24 with Judith because she's someone I can personally
 25 relate to.

1 **Q How much does it cost you every time you**
 2 **talk to Dr. Lightfoot?**
 3 A Her normal fee is \$200.
 4 **Q And how much do you pay?**
 5 A She doesn't charge me anything anymore.
 6 **Q When did she stop charging you?**
 7 A Since I got back to Australia.
 8 **Q So before you left for Titusville,**
 9 **Florida, you saw her and you were paying \$200 per**
 10 **session?**
 11 A Yes.
 12 **Q And what has Dr. Lightfoot recommended**
 13 **that you do in order to get better?**
 14 A She loves what I'm doing with speaking
 15 out. She thinks the more that I speak out about it,
 16 the stronger I'll become. She recommends that I
 17 write my book, I tell my story. She thinks not only
 18 will it help me, but by helping me it'll help others
 19 find a way to get out of the situation and to know
 20 that there's other girls who have gone through what
 21 I've gone through and what they're going through.
 22 She recommends meditation, breathing
 23 techniques, focus techniques.
 24 **Q Does she prescribe medications for you?**
 25 A No, she doesn't. She's a spiritual

1 doctor.
 2 **Q Is there anything that she's recommended**
 3 **that you do that you're not doing?**
 4 A Is there anything that I do that she
 5 recommends I don't? Sorry, say that one more time.
 6 **Q That's okay. Is there anything that**
 7 **Dr. Lightfoot has recommended that you do that you**
 8 **are not actually doing?**
 9 **Are you following her advice?**
 10 A Yes, I am.
 11 **Q Okay. And what has Dr. Donahue**
 12 **recommended that you do?**
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 25 

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
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 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 **Q All right.**
 16 MS. MENNINGER: I'm going to ask that we
 17 take just a brief break and that I can hopefully then
 18 come back and just ask a few final follow-up
 19 questions, okay?
 20 THE DEPONENT: Okay.
 21 THE VIDEOGRAPHER: We are off the record
 22 at 5:16.
 23 (Recess taken from 5:16 p.m. to 5:25 p.m.)
 24 THE VIDEOGRAPHER: We're back on the
 25 record at 5:25.

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
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 24 [REDACTED]
 25 [REDACTED]

1 **Q** [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 **Q When was it?**
 2 A I don't know the exact date.
 3 **Q What's your best recollection?**
 4 A I don't know. I would have to have dates
 5 in front of me. If you've got something that has a
 6 date on there, I'm happy to look at it and tell you
 7 it's right or wrong.
 8 **Q It was a few months ago or many months**
 9 **ago?**
 10 A Um, to my best recollection, it was about
 11 a year ago.
 12 MS. MENNINGER: I have no further
 13 questions for you at this time. As you know, there
 14 are some questions that you refused to answer and
 15 other questions that your attorney directed you not
 16 to answer. So we will take those up with the Court
 17 and may see you again.
 18 THE DEPONENT: Okay.
 19 MR. EDWARDS: And just as a matter of
 20 clarification, I don't believe that there's anything
 21 she's refused to answer. There may be things that
 22 I've instructed her not to answer because I believe
 23 that they were privileged or for whatever reason I
 24 instructed her not to answer but she hasn't refused
 25 to answer them.

1 read it.
 2 MS. MENNINGER: We're going off the
 3 record.
 4 MR. EDWARDS: Yeah, that's fine. She'll
 5 read.
 6 THE VIDEOGRAPHER: That concludes today's
 7 proceedings. We're off the record at 5:28.
 8 (Proceedings concluded at 5:28 p.m.)
 9
 10 * * * * *
 11
 12
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 22
 23
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 25

1 Either way, the record is what it is.
 2 MS. MENNINGER: I was going to say, do you
 3 dispute that the court reporter has been taking down
 4 what was said this entire time?
 5 MR. EDWARDS: I'll read it. She'll read.
 6 MS. MENNINGER: Actually, that's a good
 7 question.
 8 **Q (BY MS. MENNINGER) Do you have any**
 9 **questions that I've asked you today that you don't**
 10 **feel like you understood?**
 11 A No, I don't think that there's questions
 12 that you've asked me that I don't think I've
 13 understood. But, you know, I really just want to
 14 state something for my own piece of mind, if that's
 15 okay, if I'm allowed to do that.
 16 **Q No, that's not really what this forum is**
 17 **about.**
 18 A Okay.
 19 **Q There are other forums.**
 20 MR. EDWARDS: That will only be good for
 21 them. There is no reason to say that.
 22 THE DEPONENT: Okay.
 23 MR. EDWARDS: You get a chance to talk
 24 later.
 25 Do you have an order form? And she'll

1 I, VIRGINIA GIUFFRE, do hereby certify that
 2 I have read the foregoing transcript and that the
 3 same and accompanying amendment sheets, if any,
 4 constitute a true and complete record of my
 5 testimony.
 6
 7
 8
 9 _____
 10 Signature of Deponent
 11 () No Amendments
 12 () Amendments Attached
 13 Acknowledged before me this
 14 _____ day of _____, 2016.
 15
 16 Notary Public: _____
 17 Address: _____
 18 _____
 19 My commission expires _____
 20 Seal:
 21 KAM
 22
 23
 24
 25

1 STATE OF COLORADO)
 2) ss. REPORTER'S CERTIFICATE
 3 COUNTY OF DENVER)
 4 I, Kelly A. Mackereth, do hereby certify
 5 that I am a Registered Professional Reporter and
 6 Notary Public within the State of Colorado; that
 7 previous to the commencement of the examination, the
 8 deponent was duly sworn to testify to the truth.
 9 I further certify that this deposition was
 10 taken in shorthand by me at the time and place herein
 11 set forth, that it was thereafter reduced to
 12 typewritten form, and that the foregoing constitutes
 13 a true and correct transcript.
 14 I further certify that I am not related to,
 15 employed by, nor of counsel for any of the parties or
 16 attorneys herein, nor otherwise interested in the
 17 result of the within action.
 18 In witness whereof, I have affixed my
 19 signature this 11th day of May, 2016.
 20 My commission expires April 21, 2019.
 21
 22 _____
 23 Kelly A. Mackereth, CRR, RPR, CSR
 24 216 - 16th Street, Suite 600
 25 Denver, Colorado 80202

1 AGREN BLANDO COURT REPORTING & VIDEO, INC.
 2 216 - 16th Street, Suite 600
 3 Denver, Colorado 80202
 4 4450 Arapahoe Avenue, Suite 100
 5 Boulder, Colorado 80303
 6 VIRGINIA GIUFFRE
 7 May 3, 2016
 8 Giuffre v. Maxwell
 9 Case No. 15-cv-07433-RWS
 10 The original videotaped deposition was filed with
 11 Laura A. Menninger, Esq., on approximately the
 12 11th day of May, 2016.
 13 _____ Signature waived.
 14 _____ Unsigned; signed signature page and
 15 amendment sheets, if any, to be filed at
 16 trial.
 17 _____ Reading and signing not requested pursuant
 18 to C.R.C.P. Rule 30(e).
 19 _XXX_ Unsigned; amendment sheets and/or signature
 20 pages should be forwarded to Agren Blando to
 21 be filed in the envelope attached to the
 22 sealed original.
 23 Thank you.
 24 AGREN BLANDO COURT REPORTING & VIDEO, INC.
 25 cc: All Counsel

1 AGREN BLANDO COURT REPORTING & VIDEO, INC.
 2 216 - 16th Street, Suite 600
 3 Denver, Colorado 80202
 4 4450 Arapahoe Avenue, Suite 100
 5 Boulder, Colorado 80303
 6 May 11, 2016
 7 Sigrid S. McCawley, Esq.
 8 BOIES, SCHILLER & FLEXNER LLP
 9 401 East Las Olas Boulevard
 10 Suite 1200
 11 Fort Lauderdale, FL 33301-2211
 12 Re: Videotaped Deposition of VIRGINIA GIUFFRE
 13 Giuffre v. Maxwell
 14 Case No. 15-cv-07433-RWS
 15 The aforementioned deposition is ready for reading
 16 and signing. Please attend to this matter by
 17 following BOTH of the items indicated below:
 18 _____ Call 303-296-0017 and arrange with us to read
 19 and sign the deposition in our office.
 20 _XXX_ Have the deponent read your copy and sign
 21 the signature page and amendment sheets, if
 22 applicable; the signature page is attached.
 23 _____ Read the enclosed copy of the deposition and
 24 sign the signature page and amendment
 25 sheets, if applicable; the signature page is
 attached.
 18 _XXX_ WITHIN 30 DAYS OF THE DATE OF THIS LETTER
 19 _____ By _____ due to a trial date of _____
 20 Please be sure the original signature page and
 21 amendment sheets, if any, are SIGNED BEFORE A NOTARY
 22 PUBLIC and returned to Agren Blando for filing with
 23 the original deposition. A copy of these changes
 24 should also be forwarded to counsel of record.
 25 Thank you.
 AGREN BLANDO COURT REPORTING & VIDEO, INC.
 cc: All Counsel

- AMENDMENT SHEET -
 Videotaped Deposition of VIRGINIA GIUFFRE
 May 3, 2016
 Giuffre v. Maxwell
 Case No. 15-cv-07433-RWS
 The deponent wishes to make the following changes in
 the testimony as originally given:

Page	Line	Should Read	Reason
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

 Signature of Deponent: _____
 Acknowledged before me this _____ day of _____, 2016.
 (seal) Notary's signature _____
 My commission expires _____.

EXHIBIT E

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Meredith Schultz, Esq.
E-mail: mschultz@bsflfp.com

May 23, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
lmenninger@hmflaw.com

Re: *Giuffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Laura:

This letter is to seek your agreement to produce Ross Gow for deposition, as the agent of your client, Ms. Maxwell. We can work with Mr. Gow's schedule to minimize inconvenience. Please advise by Wednesday, May 25, 2016, whether you will produce Mr. Gow, or whether we will need to seek relief from the Court with respect to his deposition.

Sincerely,


Meredith Schultz

MLS:dk



Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmflaw.com
lmenninger@hmflaw.com

May 25, 2016

VIA EMAIL

Meredith Schultz
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
mschultz@bsflp.com

Re: *Giuffre v. Maxwell*, Case No. 15-cv-07433-RWS

Dear Ms. Schultz:

I am not aware of any legal authority that would allow Ms. Maxwell to “produce” Ross Gow for a deposition and you do not cite to any rule or case that would either enable or require her to do so. If you are aware of any authority for this request please provide it to me and I will consider it.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger

Laura A. Menninger

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Sigrid S. McCawley, Esq.
E-mail: smccawley@bsfllp.com

May 12, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
Jeffrey Pagliuca, ESQ.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203

Re: *Giuffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Ms. Menninger:

Please find enclosed Bates-stamped GIUFFRE005370 through GIUFFRE005438, which are being produced pursuant to Defendant's Request for Production. Certain of the documents within this production have been designated as CONFIDENTIAL in accordance with the Protective Order. Please treat these documents accordingly.

If you have any questions concerning the foregoing, or if there are any issues with the media, please do not hesitate to contact me at (954) 356-0011.

Sincerely,

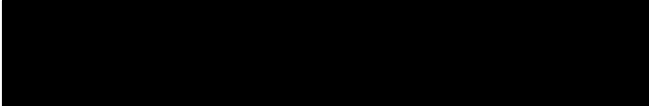


Sigrid S. McCawley

SSM/ep
Enclosures

Authorization to Disclose Protected Health Information

Name: Virginia Giuffre



I hereby authorize the use and/or disclosure of my protected health information as described in this authorization.

1. Specific person/organization (or class of persons) authorized to provide the information:

Judith Lightfoot

2. Specific person/organization (or class of persons) authorized to receive and use the information:

**Sigrid McCawley
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301**

3. Specific description of the information: **Medical records from 1999 to the present**, including, but not limited to, all of my office medical records, hospital medical records, patient information sheets, questionnaires, x-rays, other diagnostic studies and laboratory tests, emergency room records, out-patient records, consultation records, therapy records, and all other in-patient or out-patient hospital notes, charts, documents, all personal notes and all billing records.

4. Specific purpose for the use and/or disclosure of the protected health information: At my request in connection with litigation pending in the County District Court.

5. I understand this authorization will expire, without my express revocation, one year from the date of signing, or if I am a minor, on the date I become an adult according to state law. I understand that I may revoke this authorization in writing at any time except to the extent that action has been taken based on this authorization. I understand that revocation will not apply to information that has already been released as specified by this authorization or to my insurance company when the law provides my insurer with the right to contest a claim under my policy or the policy itself.

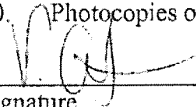
6. I understand that the medical information released by this authorization may include information concerning treatment of physical and mental illness, alcohol/drug abuse and past medical history.

7. I understand that after this information is disclosed, federal law might not protect it and the recipient might disclose it.

8. I understand that I am entitled to receive a copy of this authorization.

9. I understand that I may refuse to sign this authorization and that my refusal to sign will not affect my ability to obtain treatment from the above-named medical provider.

10. Photocopies of this authorization are to be given the same effect as the original.



Signature

5/2/16
Date

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**DECLARATION OF SIGRID S. MCCAWLEY REPLY IN SUPPORT OF MOTION TO
EXTEND THE DEADLINE TO COMPLETE DEPOSITIONS AND OPPOSITION TO
MOTION FOR SANCTIONS FOR VIOLATION OF RULE 45**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a Partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in response to Defendant's Opposition to Motion to Extend Deadline to Complete Depositions and Motion for Sanctions for Violation of Rule 45.
3. Attached hereto as Exhibit 1, is a true and correct copy of Sigrid McCawley's March 7, 2016 Correspondence to Martin G. Weinberg, Esquire.
4. Attached hereto as Exhibit 2, is a true and correct copy of Sigrid McCawley's May

25, 2016 Correspondence to Martin G. Weinberg.

5. Attached hereto as Exhibit 3, is a true and correct copy of Sigrid McCawley's May 23, 2016 Correspondence to Martin G. Weinberg.

6. Attached hereto as Exhibit 4, is a true and correct copy of Sigrid McCawley's May 17, 2016 Correspondence to Opposing Counsel.

7. Attached hereto as Exhibit 5, is a true and correct copy of Gregory Poe's June 16, 2016 correspondence to Bradley Edwards.

8. Attached hereto Exhibit 6, is a true and correct copy of Sigrid McCawley's March 31, 2016 Correspondence to Bruce Reinhart.

9. Attached hereto Exhibit 7, is a true and correct copy of Douglas G. Mercer's Affidavit of Service dated May 24, 2016.

10. Attached hereto as Exhibit 8, is a true and correct copy of Jack Goldberg's May 23, 2016 Correspondence to Sigrid McCawley.

11. Attached hereto Exhibit 9, is a true and correct copy of Sigrid McCawley's June 21, 2016 Correspondence to Bruce Reinhart.

12. Attached hereto Exhibit 10, is a true and correct copy of Plaintiff's Notice of Taking Videotaped Deposition of Jean Luc Brunel.

13. Attached hereto Composite Exhibit 11, is a true and correct copy of Brad Edwards June 14, 2016 Correspondence to Ross Gow.

14. Attached hereto Exhibit 12, is a true and correct copy of transcript of May 24, 2016 Phone Conference with Plaintiff's Attorney, Defendant's Attorney and Judge Robert Sweet.

15. Attached hereto Exhibit 13, is a true and correct copy of Defendant's Rule 26

Disclosures.

16. Attached hereto Composite Exhibit 14, is a true and correct copy of Meredith Schultz Correspondence to Opposing Counsel.

17. Attached hereto Exhibit 15, is a true and correct copy of Meredith Schultz Correspondence to Opposing Counsel.

18. Attached hereto Exhibit 16, is a true and correct copy of Meredith Schultz June 13, 2016 Correspondence to Defendant's Counsel.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid McCawley

Sigrid McCawley

Dated: June 22, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
Sigrid McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Ft. Lauderdale, FL 33301
Tel: (954) 356-0011
Email: smccawley@bsfllp.com

David Boies
Boies, Schiller & Flexner LLP
333 Main Street
Armonk, NY 10504

Paul G. Cassell (Pro Hac Vice)
Ronald N. Boyce Presidential Professor of
Criminal Law
S.J. Quinney College of Law at the
University of Utah
383 S. University St.
Salt Lake City, UT 84112-0730
(801) 585-5202 (phone)
(801) 585-2750 (fax)
Email: cassellp@law.utah.edu

Bradley Edwards (Pro Hac Vice)
Farmer, Jaffe, Weissing, Edwards,
Fistos & Lehrman, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Tel: (954) 524-2820
Fax: (954) 524-2822
Email: brad@pathtojustice.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 22, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

Laura A. Menninger, Esq.
Jeffrey Paliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
[Email: lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**DECLARATION OF SIGRID S. McCAWLEY IN SUPPORT OF
PLAINTIFF'S REPLY IN SUPPORT OF HER MOTION TO COMPEL DEFENDANT
TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's September 29, 2015 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in support of Plaintiff's Reply in Support of her Motion to Compel Defendant To Answer Deposition Questions Filed Under Seal.
3. Attached hereto as Exhibit 1, is a true and correct copy of Excerpts from the April 22, 2016 Deposition Transcript of Ghislaine Maxwell.
4. Attached hereto as Composite Exhibit 2, are true and correct copies of the Flight Logs of Jeffrey Epstein's private planes and summary charts.
5. Attached hereto as Exhibit 3, is a true and correct copy of the Palm Beach Police Report.

6. Attached hereto as Exhibit 4, are true and correct copies of Excerpts from the July 29, 2009 Deposition Transcript of Alfredo Rodriguez.

7. Attached hereto as Exhibit 5, is a true and correct copy of Excerpts from Juan Alessi's November 21, 2005 Sworn Statement.

8. Attached hereto as Exhibit 6, is a true and correct copy of Excerpts from the September 8, 2009 Deposition Transcript of Juan Alessi.

9. Attached hereto as Exhibit 7, is a true and correct copy of Excerpts from the August 7, 2009 Deposition Transcript of Alfredo Rodriguez.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Dated: May 11, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

Sigrid McCawley (Pro Hac Vice)
Boies, Schiller & Flexner LLP 401 E.
Las Olas Blvd., Suite 1200 Ft.
Lauderdale, FL 33301
(954) 356-0011

David Boies
Boies, Schiller & Flexner LLP 333
Main Street
Armonk, NY 10504

Bradley J. Edwards (Pro Hac Vice)
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)
S.J. Quinney College of Law
University of Utah
383 University St.
Salt Lake City, UT 84112
(801) 585-5202¹

¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 11, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

Laura A. Menninger, Esq.
Jeffrey Paliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmenninger@hmflaw.com
jpagliuca@hmflaw.com

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

EXHIBIT 4

(Filed Under Seal)

Sigrid McCawley

From: Sigrid McCawley
Sent: Tuesday, May 17, 2016 3:53 PM
To: Laura Menninger; Meredith Schultz; Jeff Pagliuca
Cc: 'brad@pathtojustice.com' (brad@pathtojustice.com); Paul Cassell (cassellp@law.utah.edu)
Subject: RE: Notice of Subpoena
Attachments: May-June 2016 Deposition Calendar.pdf

Hello Laura – We are working on the calendar and I have it almost complete but I was awaiting confirmation on a date from Mr. [REDACTED] counsel so I didn't want to send it out prematurely and that was delaying me.

We were serving subpoenas on dates that we thought are grouped within the locations/date ranges we discussed during the meet and confer and since we have been having an extraordinarily difficult time serving witnesses who appear to be attempting to evade service we need to keep that process moving.

We do intend to work with you on dates as we discussed. Attached is the proposed calendar with the caveat that dates may shift if witnesses make change requests but we are doing our best to group locations together where possible.

Again – this is not final as I noted I believe you had some dates you were gone but were checking with Jeff to determine his availability.

Finally, we are writing to confer whether you will stipulate that we may exceed the 10 deposition limit to complete discovery in this case or whether we need to file a motion with the Court on that issue.

Thank you,
Sigrid

Sigrid S. McCawley
Partner

BOIES, SCHILLER & FLEXNER LLP

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Phone: 954-356-0011 ext. 4223

Fax: 954-356-0022

<http://www.bsfllp.com>

From: Laura Menninger [mailto:lmenninger@hmflaw.com]
Sent: Tuesday, May 17, 2016 3:19 PM
To: Meredith Schultz; Jeff Pagliuca
Cc: Sigrid McCawley; 'brad@pathtojustice.com' (brad@pathtojustice.com); Paul Cassell (cassellp@law.utah.edu)
Subject: Re: Notice of Subpoena

Sigrid and Brad -

We had a conferral last week in which you promised to provide for conferral purposes a proposed schedule for depositions we both had requested in various locations. Rather than provide any such schedule, you have instead sent us notices for approximately 7 depositions in NY and Florida, one for an individual who you did not mention deposing and who does not appear among the extensive list of witnesses in your Rule 26 disclosures.

If you do not intend to abide by the representations you made in our conferral, then please advise and we will once again be forced to seek intervention of the Court. See Local Rule 26.4.

-Laura

From: Meredith Schultz <mschultz@BSFLLP.com>
Date: Tuesday, May 17, 2016 at 1:08 PM
To: Laura Menninger <lmenninger@hmflaw.com>, Jeff Pagliuca <jpagliuca@hmflaw.com>
Cc: Sigrid McCawley <smccawley@bsfllp.com>, Brad Edwards <brad@pathtojustice.com>, Paul Cassell <cassellp@law.utah.edu>
Subject: Notice of Subpoena

Laura,

Please see the attached documents.

Thanks,

Meredith

Meredith L. Schultz
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: 954-356-0011 ext. 4204
Fax: 954-356-0022
<http://www.bsfllp.com>

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1]

Virginia Giuffre v. Ghislaine Maxwell
 Case no. 15-cv-07433-RWS

MAY 2016

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18 Deposition of [REDACTED] Ft. Lauderdale, FL (confirmed)	19	20 Deposition of [REDACTED] Oxford, FL (confirmed)	21
22	23	24 Deposition of [REDACTED] Denver, CO (confirmed) although location may change per Menninger)	25	26 Deposition of Dr. Steven Olson Denver, CO (confirmed)	27	28
29	30	31 Deposition of Juan Alessi Ft. Lauderdale, FL (subpoena served)				

Virginia Giuffre v. Ghislaine Maxwell
 Case no. 15-cv-07433-RWS

June 2016

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1 Deposition of Maria Alessi Ft. Lauderdale, FL (subpoena served) and/or [REDACTED]	2 Deposition of [REDACTED] Ocala, FL (subpoena served but Maxwell's counsel needs to confirm date change with witness)	3 Deposition of [REDACTED] Ft. Lauderdale, FL (subpoena served)	4 Deposition of [REDACTED] Ft. Lauderdale, FL (served)
5	6	7 Deposition of [REDACTED] New York, NY (possible date)	8 Deposition of [REDACTED] New York/New Jersey	9 Deposition of [REDACTED] New York, NY	10 Deposition of [REDACTED] Armonk, NY (confirmed)	11
12	13	14 Deposition of [REDACTED] New York, NY	15 Deposition of Jared Weisfeld/ Sharon Churcher (or find additional date if they will be too long)	16 Deposition of [REDACTED] Armonk, NY	17	18
19	20 Deposition of Detective Joe Recarcy Ft. Lauderdale, FL	21 Deposition of [REDACTED] Ft. Lauderdale, FL	22 Deposition of [REDACTED] New York, NY	23	24	25

Virginia Giuffre v. Ghislaine Maxwell

Case no. 15-cv-07433-RWS

26	27	28	29	30												
		Deposition of [redacted] California or London (possible date not served with subpoena yet)	(Other California witnesses if needed)	Deposition of [redacted] (possible date)												

***Week of June 20 – 24 may be bad for Maxwell’s counsel (please confirm)
 *****Week of June 27 – July 1st may be bad for Maxwell’s counsel (please confirm)
 *****Need to confirm Maxwell will accept service for her agent Ross Gow.
 There may be a few other witnesses that we may need to add if they can’t confirm attendance at trial.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

MOTION TO COMPEL ALL ATTORNEY-CLIENT COMMUNICATIONS AND
ATTORNEY WORK PRODUCT
PLACED AT ISSUE BY PLAINTIFF AND HER ATTORNEYS

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Defendant Ghislaine Maxwell (“Ms. Maxwell”) files this Motion to Compel All Attorney-Client Communications and Attorney Work Product Placed At Issue By Plaintiff and Her Attorneys (“Motion”), and as grounds therefore states as follows:

CERTIFICATE OF CONFERRAL

Pursuant to Federal Rule of Civil Procedure 37(a)(1), undersigned counsel certifies that she conferred with opposing counsel regarding the issues contained herein and was unable to resolve the matter.

INTRODUCTION

Plaintiff and her attorneys have tied a Gordian knot of overlapping litigations, client representations and joint defense agreements. Through these multiple litigations and representations, they attempt to strategically leverage attorney-client communications and attorney work product to their tactical advantage by selectively disclosing information. Simultaneously, they desperately seek to avoid disclosure of related materials they know are unfavorable, would destroy Plaintiff’s claim that she has been truthful, and reveal her attorneys’ knowledge of Plaintiff’s false statements in multiple sworn filings and her concerted media campaign. The law, however, does not permit such a manipulation of the attorney-client and work product privileges. Rather, the selective disclosure of privileged materials results in a waiver of privilege as to all such material. This waiver is broad-sweeping when, as here, the persons asserting the privileges have affirmatively put the subject matter of the materials at issue.

In the most recent of their serial litigations (apart from this case), Plaintiff’s own attorneys Bradley Edwards (“Edwards”) and Paul Cassell (“Cassell”) sued Harvard Law Professor Alan Dershowitz (“Dershowitz”) for defamation in Florida state court. The subject matter of that litigation concerned whether Mr. Dershowitz defamed Plaintiff’s attorneys by claiming

a) Plaintiff is lying; b) Edwards and Cassell knew Plaintiff is lying; c) Edwards and Cassell helped

Plaintiff lie and helped her concoct her stories; d) Edwards and Cassell failed to properly investigate Plaintiff's allegations before filing pleadings and sworn statements on Plaintiff's behalf; and e) Edwards and Cassell were motivated to take these actions by a desire to achieve personal economic gain. This litigation put at issue all communications between Plaintiff and her attorneys as well as her attorneys' complete work product in the investigations of Plaintiff's stories and accusations. The truth of the matters put at issue in the Dershowitz litigation can only be tested by examination of privileged materials, resulting in a sweeping waiver.

BACKGROUND FACTS RELEVANT TO DISPUTE

In her privilege log, Plaintiff has "categorically" logged five separate groups of documents she has withheld on the basis of "AC Privilege and Work Product/joint defense/common interest." The documents are identified as:

1. Correspondence re: Jane Doe #1 and Jane Doe #2 v. United States, Case No. 08-80736-CIV-Marra, pending in the Southern District of Florida. ("CVRA Case")

Plaintiff withheld documents purportedly to and from her attorneys (and others) related to legal advice regarding the CVRA Case (to which Plaintiff is not a party), and documents purportedly giving attorney mental impressions related to the CVRA Case and "evidence" related thereto. Declaration of Laura A. Menninger ("Menninger Decl."), Exhibit A.

- (i) The date range of the documents is 2011 – Present. *Id.*
- (ii) Persons identified as involved in the communications are: Plaintiff Virginia Giuffre ("Giuffre"), Brad Edwards ("Edwards"), Paul Cassell ("Cassell"), Brittany Henderson ("Henderson"), Sigrid McCawley ("McCawley"), Meredith Schultz ("Shultz"), David Boies ("Boies"), Jack Scarola ("Scarola"), Stan Pottinger ("Pottinger"), Ellen Brockman ("Brockman"), Legal Assistants ("Legal Assistants"), Professionals retained by attorneys to aid in the rendition of legal advice and representation ("Other Professionals"). *Id.*

2. Correspondence re: Giuffre v. Maxwell, 15-cv-07433-RWS, pending in the Southern District of New York ("Maxwell Case"). *Id.*

- (i) The date range of the documents is September 21, 2015– Present. *Id.*

- (ii) Persons identified as involved in the communications are: Giuffre, Edwards Cassell, Henderson, McCawley, Schultz, Boies, Pottinger, Stephen Zach (“Zach”), Brockman, Legal Assistants and Other Professionals. *Id.*

3. Correspondence re: Bradley Edwards and Paul Cassell v. Alan Dershowitz (“Dershowitz Case”), Case No. 15000072, pending in the Seventeenth Judicial Circuit, Broward County, Florida. (“Dershowitz Case”). *Id.*

- (i) The date range of the documents is January 2015 -Present. *Id.*
- (ii) Persons identified as involved in the communications are: Giuffre, Edwards Cassell, Henderson, McCawley, Schultz, Boies, Pottinger, Zach, Brockman, Legal Assistants and Other Professionals. *Id.*

4. Correspondence re: Jane Doe No. 102 v. Jeffrey Epstein (“Epstein Case”), Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida) (“Epstein case”)

- (i) The date range of the documents is 2009 – Present
- (ii) Persons identified as involved in the communications are: Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice. *Id.*

5. “This categorical entry is regarding correspondence potential legal action against entities and individuals.” (same description re potential litigation)

- (i) The date range of the documents is from January 2015 –Present.
- (ii) Persons identified as involved in the communications are: Giuffre, Edwards Cassell, Henderson, McCawley, Schultz, Boies, Pottinger, Zach, Brockman, Legal Assistants and Other Professionals.

Plaintiff is withholding “Approx. 1.3 kilobytes [of documents] overlapping with other cases” based on the categorically logged entries in Paragraph 1.

According to her most recent interrogatory response, Plaintiff has been represented in various litigation matters identified above as follows:

- (a) Pottinger, Boies, and McCawley (along with other Boies Schiller & Flexner LLP (“Boies Schiller”) attorneys represent Ms. Giuffre as a non-party in the Dershowitz Case, starting in February 2015.
- (b) Edwards (along with other Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. attorneys), Cassell, Pottinger, Boies and McCawley and Boies Schiller attorneys represent Ms. Giuffre in the Maxwell case, “the complaint of which was filed in September, 2015.” *Id.*

(c) Cassell represents Ms. Giuffre as a non-party in the CVRA Case, starting in May of 2014. *Id.*

(d) Edwards and other Farmer, Jaffe attorneys represent Ms. Giuffre as a non-party in the CVRA Case, starting in 2011. *Id.*

(e) Cassell provided Ms. Giuffre with legal advice concerning potential legal action starting in early 2011. *Id.*

(f) Cassell, Edwards and other Farmer, Jaffe attorneys, Pottinger, Boies (along with other Boies Schiller attorneys) represent Ms. Giuffre regarding investigations into potential legal action starting in the second half of 2014. *Id.*

(g) According to Plaintiff, she has never been represented by Scarola.

Menninger Decl., Ex. B at 4.

The CVRA Case

In the CVRA Case, Edwards (starting in 2011) and Cassell (starting in May 2014) have represented Plaintiff in attempting to obtain joinder in the pending action. On December 30, 2014, Cassell and Edwards filed a pleading titled "Jane Doe #3 and Jane Doe #4's Motion Pursuant to Rule 21 for Joinder in Action" in the CVRA Case. Menninger Decl., Ex C (the "Joinder Motion"). The Joinder Motion contained a number of allegations on behalf of "Jane Doe # 3," who is actually Ms. Giuffre, the Plaintiff in this case. The allegations include that "Epstein also sexually trafficked the then-minor Jane Doe [#3], making her available for sex to politically-connected and financially-powerful people." The "politically-connected and financially powerful people" identified by Edwards and Cassell by name in the Joinder Motion as having had sexual relations with Jane Doe #3 were Prince Andrew, Duke of York ("Prince Andrew"), Ms. Maxwell, Jean Luc Brunel ("Brunel") and Alan Dershowitz ("Dershowitz"). *Id.* at 3-6.¹

¹ The judge in the CVRA case subsequently struck these allegations, stating "[a]t this juncture in the proceedings, these lurid details are unnecessary to the determination of whether Jane Doe 3 and Jane Doe 4 should be permitted to join Petitioners' claim that the Government violated their rights under the CVRA. The factual details regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim

Following the Joinder Motion, Dershowitz made numerous public appearances in which he vigorously denied the allegations, stated that Edwards and Cassell “are lying deliberately,” and that if Cassell and Edwards “had just done an hours’ worth of work, they would have seen she [Plaintiff] is lying through her teeth.” *See* Menninger Decl., Ex. E at 9-10.

The Dershowitz Case

On January 6, 2015, Edwards and Cassell initiated litigation against Dershowitz - the Dershowitz Case. *See* Menninger Decl., Ex. F.

In the Dershowitz Case, Edwards and Cassell sued Dershowitz for defamation claiming that Dershowitz’s public statements – that they and their client were lying and that they failed to investigate their client’s claims – were false. The Complaint by Edwards and Cassell alleged that “[i]mmediately following the filing of what Dershowitz knew to be an entirely proper and well-founded pleading, Dershowitz initiated a massive public media assault on the reputation and character of Bradley J. Edwards and Paul G. Cassell accusing them of intentionally lying in their filing, of having leveled knowingly false accusations against the Dershowitz without ever conducting any investigation of the credibility of the accusations, and of having acted unethically to the extent that their willful misconduct warranted and required disbarment.” Menninger Decl., Ex. F, ¶ 17.

Edwards and Cassell claimed as false Dershowitz’s statements that “Edwards and Cassell failed to minimally investigate the allegations advanced on behalf of their client [Virginia Giuffre] and even that they sat down with her to contrive the allegations.” Menninger Decl., Ex. E at 9. During the Dershowitz litigation, Edwards and Cassel responded to interrogatories and requests for production issued by Dershowitz. Menninger Decl., Ex. G. Interrogatory No.1 asked:

(i.e., that they were known victims of Mr. Epstein and the Government owed them CVRA duties), especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken.” *See* Menninger Decl., Ex. D.

“State verbatim or as close as possible Each statement by Dershowitz that You assert defamed You,” to which Edwards and Cassel responded with nine pages of statements made by Dershowitz in the press where Dershowitz states: 1) Plaintiff is lying; 2) Edwards and Cassel know Plaintiff is lying; 3) Edwards and Cassel helped Plaintiff lie and “put words in her mouth”; and 4) Edwards and Cassel failed to properly investigate Plaintiff’s allegations before publicizing Plaintiff’s statements. Menninger Decl., Ex. G at 3-11.

Edwards and Cassell further stated that the listed Dershowitz press statements were defamatory because “[t]he factual assertions contained or implied in the statements quoted in answer to Interrogatory Number 1 were not true, notably with regard to claims that Edwards and Cassell were deliberately lying, had failed to conduct an investigation of the allegations before filing them, had manipulated or conspired with Jane Doe No. 3 to make intentionally false allegations about Mr. Dershowitz, and that Plaintiffs were motivated to participate in the filing of knowingly false accusations against the Defendant by a desire to achieve personal economic gain.” Menninger Decl., Ex. G at 11, Response to Interrog. 2.

At the time the Dershowitz Case was filed, Edwards, Cassell and Boies represented Plaintiff regarding “potential litigations.” *See supra* at ¶ 3f.

Plaintiff, Edwards and Cassell claim to be in a joint defense or common interest agreement relating to the Dershowitz Case (Menninger Decl., Ex. H at 205:19-206:7), although no such agreement has ever been produced.

Plaintiff and her counsel actively participated in the Dershowitz Case. Plaintiff provided a declaration in the Dershowitz Case in support of the claims against Dershowitz. Menninger Decl., Ex. I. Plaintiff also sat for a deposition in the Dershowitz Case and testified in a manner expected to support Edwards’ and Cassell’s claims. Menninger Decl., Ex. H. Her counsel filed 12 pleadings in that matter.

I. The Attorney-Client and Work Product Privilege Standards and Limitations

a. The Attorney-Client Privilege

“The attorney-client privilege protects communications (1) between a client and his or her attorney (2) that are intended to be, and in fact were, kept confidential (3) for the purpose of obtaining or providing legal advice.” *United States v. Mejia*, 655 F.3d 126, 132 (2d Cir. 2011). The purpose of the privilege “is to encourage full and frank communication between attorneys and their clients and thereby promote broader public interests in the observance of law and administration of justice.” *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981). “In order to balance this protection of confidentiality with the competing value of public disclosure, however, courts apply the privilege only where necessary to achieve its purpose and construe the privilege narrowly because it renders relevant information undiscoverable.” *Mejia*, 655 F.3d at 132. Because the privilege “stands in derogation of the search for truth so essential to the effective operation of any system for justice ... the privilege must be narrowly construed.” *Calvin Klein Trademark Trust v. Wachner*, 198 F.R.D. 53, 55 (S.D.N.Y. 2000) (citing *United States v. Nixon*, 418 U.S. 683, 710 (1974)). “The party invoking the privilege also has the burden to show that the privilege has not been waived.” *Wultz v. Bank of China Ltd.*, 304 F.R.D. 384, 391 (S.D.N.Y.2015).

b. Work Product Privilege

The work-product privilege protects documents either created by counsel or at counsel's directive, in anticipation of litigation. See *In re Grand Jury Subpoenas Dated March 19, 2002 & August 2, 2002*, 318 F.3d 379, 383 (2d Cir. 2003). The attorney work-product privilege “shelters the mental processes of the attorney, providing a privileged area within which he can analyze and prepare his client's case.” *United States v. Nobles*, 422 U.S. 225, 238 (1975). Again, the party

asserting the work-product privilege “bears the heavy burden of establishing its applicability.” *In re Grand Jury Subpoena Dated July 6, 2005*, 510 F.3d 180, 183 (2d Cir. 2007). Work product “includes both opinion work product, such as an attorney's mental impressions or legal theories, and fact work product, such as factual investigation results.” *Koumoulis v. Indep. Fin. Mktg. Grp., Inc.*, 295 F.R.D. 28, 39-40 (E.D.N.Y. 2013), *aff'd*, 29 F. Supp. 3d 142 (E.D.N.Y. 2014). “Both the attorney-client and work-product privileges may be waived if a party puts the privileged communication at issue by relying on it to support a claim or defense.” *Id.*

II. Plaintiff and her Attorneys Waived Attorney-Client and Work Product Privileges by Putting Plaintiff's Representation At Issue in the Dershowitz Case

“The [attorney-client] privilege may implicitly be waived when [a party] asserts a claim that in fairness requires examination of protected communications.” *United States v. Bilzerian*, 926 F.2d 1285, 1292 (2d Cir.1991); *see also McGrath v. Nassau Cty. Health Care Corp.*, 204 F.R.D. 240, 244 (E.D.N.Y. 2001) (“Parties may waive any work product protection by putting the privileged information at issue”). Courts determine whether a subject matter has been placed at issue based on whether “(1) assertion of the privilege was a result of some affirmative act, such as filing suit, by the asserting party; (2) through this affirmative act, the asserting party put the protected information at issue by making it relevant to the case; and (3) application of the privilege would have denied the opposing party to information vital to his defense.” *Bank Brussels Lambert v. Credit Lyonnais (Suisse), S.A.*, 210 F.R.D. 506, 509-10 (S.D.N.Y. 2002) (*quoting Hearn v. Rhay*, 68 F.R.D. 574, 581 (E.D.Wash.1975)). “[C]ourts have generally applied the *Hearn* [at issue] doctrine liberally, finding a broad waiver of attorney-client privilege where a party asserts a position “the truth of which can only be assessed by examination of the privileged communication.” *Bank Brussels Lambert*, 210 F.R.D. at 508.

After a party voluntarily discloses attorney-client communications or work-product information “to an adversary in one proceeding, it cannot withhold the same documents on the basis of privilege in a subsequent proceeding, even if that subsequent proceeding involves a different adversary.” *Chevron Corp. v. Salazar*, 275 F.R.D. 437, 445-46 (S.D.N.Y. 2011); *see also In re Steinhardt Partners*, 9 F.3d 230, 235 (2d. Cir. 1993) (“The waiver doctrine provides that voluntary disclosure of work product to an adversary waives the privilege as to other parties [in a subsequent proceeding].”); *Urban Box Office Network, Inc. v. Interfase Managers, L.P.*, No. 01 Civ. 8854, 2004 WL 2375819, at *3–4 (S.D.N.Y. Oct. 21, 2004) (applying same principle to waive attorney-client privilege). This, of course, makes sense because “where a party voluntarily undertakes actions that will predictably lead to the disclosure of [a] document, then waiver will follow.” *Chevron Corp.*, 275 F.R.D. at 445-46 (*internal citations omitted*).

“The scope of the attorney-client privilege waiver is determined on a case by case basis by considering the context of the waiver and the prejudice caused to the other party by permitting partial disclosure of privileged communications.” *McGrath*, 204 F.R.D. at 244 (E.D.N.Y. 2001) (citing *In re Grand Jury Proceedings*, 219 F.3d 175, 190 (2d Cir.2000)). “As in the attorney-client context, fairness and prejudice concerns define the scope of any work product waiver.” *Id.* at 192. Factors considered by the Second Circuit to find a broad waiver appropriate include “(1) whether substantive information has been revealed; (2) prejudice to the opposing party caused by partial disclosure; (3) whether partial disclosure would be misleading to a court; (4) fairness; and (5) consistency.” *Id.*

a. Plaintiff's Waiver of the Attorney-Client Privilege

Edwards and Cassell sued Dershowitz for defamation claiming that Dershowitz's public statements about their representation of client were false. At the time those claims were filed, Edwards and Cassell represented Plaintiff in the CVRA Case. She was also represented by Edwards, Cassell and Boies regarding "potential litigation." The statements Edwards and Cassell claimed as false included that "Edwards and Cassell failed to minimally investigate the allegations advanced on behalf of their client [Virginia Giuffre] and even that they sat down with her to contrive the allegations." The allegations Edwards and Cassell failed to minimally investigate and/or contrived where the allegations made by Plaintiff in the CVRA Joinder Motion. Dershowitz counterclaimed against Edwards and Cassell suing them for 1) the publication of the false allegations of Giuffre in the Joinder Motion and 2) defamation for their extra-judicial false statements concerning Dershowitz and his alleged involvement with Giuffre.

Plaintiff and her counsel McCawley actively participated in the Dershowitz Case and affirmatively waived any attorney-client privilege over Plaintiff's communications. Plaintiff produced documents, sat for a deposition (Menninger Decl., Ex. H) and provided a sworn declaration (Menninger Decl., Ex. I). Through her participation in the case, Plaintiff specifically discussed her communications with Edwards and Cassell. In her sworn declaration, she discussed the following attorney communications:

- Her conversation with Brad Edwards in 2011 when she first told him her story. This was followed by a telephone conversation with Edwards and his attorney, Scarola, which was recorded with her knowledge and consent and which has been filed in multiple court papers and given to the press² (Menninger Decl., Ex I at ¶ 55-56);

² Edwards participated in this call as Plaintiff's attorney. Plaintiff believed that the conversation was covered by attorney-client privilege. *See* Menninger Decl., Ex. J, (email between Plaintiff and Sharon Churcher crafting communication to Edwards regarding publication of privileged communication). Yet, when the conversation was sent to the press, and used in later court filings, Plaintiff did nothing to stop the publication of this privileged

- Her discussions with Edwards and Cassell of her representation in the CVRA Case (*id.* at ¶ 61);
- Her directions to counsel to pursue criminal charges (*id.* at ¶ 65);
- In her conversations with her attorneys “no one” has “pressured” her to identify Dershowitz as a person who allegedly abused her (*id.* at ¶ 67);
- Her authorization to her attorney to file various affidavits including her stories (*id.* at ¶ 67);
- Her attorneys’ belief in the truth of her statements (*id.* at ¶ 68).

Plaintiff’s waiver of her attorney-client privilege was solidified during her deposition in the Dershowitz Case. At the conclusion of questioning by Dershowitz’s counsel, and after off the records discussions between and among McCawley, Edwards, Cassell and Jack Scarola (counsel for Edwards and Cassell), Mr. Scarola then asked Plaintiff a series of questions directly discussing her communications with her counsel. McCawley made no objection and Plaintiff responded to each question. Scarola asked if Edwards pressured or encouraged her to lie:

Q. Has Brad [Edwards] ever pressured you or encouraged you in any way or under any circumstances at any time to provide false information about Jeffrey Epstein?

A. Never.

Q. Has he ever pressured you or encouraged you at any time or in any way, under any circumstances to provide false information about anyone or anything?

A. Never.

Menninger Decl., Ex. H at 202:5-202:12. Scarola asked similar questions concerning Cassell.

Id. at 202-03. The questioning, however, was not limited to Plaintiff’s conversations with

Edwards and Cassell. Scarola’s final question, again answered without objection by McCawley,

was:

communication. This alone is sufficient to waive the attorney-client privilege communication as between Edwards and Plaintiff. *See infra*, p. 19-20.

Q. Apart from any efforts made by Jeffrey Epstein or agents on behalf of Jeffrey Epstein to silence you or to have you refrain from providing true and accurate information about the interactions that you had with Jeffrey Epstein and others to whom you were trafficked by Jeffrey Epstein, has anyone apart from that circumstance pressured you or encouraged you to provide false information about any of the topics that were covered during the course of your examination? . . .

A. No.

Menninger Decl., Ex. H at 203:18-204:7.

There is no mechanism by which Plaintiff could respond to any of these questions with the answer “never” unless she is recollecting and relying on the content of each and every communication she had with Edwards, Cassell and any other person (including each and every one of her attorneys) about the “topics covered” in the deposition. The topics covered in the deposition were wide ranging including the full breadth of statements she and her counsel had made in the CVRA Case, identification of the “high powered” individuals with whom she claims to have had sexual relations, when and how she allegedly met Epstein, the timing and specifics of her alleged encounters with Dershowitz, Prince Andrew, Maxwell and others, and her interviews with and statements to media outlets. In other words, the topics included every story Plaintiff has ever told concerning the time she claims she was a “sex slave.”

Notably, the Special Master overseeing Plaintiff’s deposition in the Dershowitz Case immediately recognized the waiver. On re-direct, the following colloquy occurred:

Q BY MS. BORJA (Dershowitz’ counsel): Now, I understand from your testimony that Mr. Edwards did not pressure you to give false information about this matter, is that fair?

A. That's fair.

Q. Tell me everything that Mr. Edwards told you about this matter?

MS. MCCAWLEY: Objection, that's privileged and she has not waived any privilege. She's not here testifying as to what she discussed with her lawyers.

SPECIAL MASTER: You know, it's an interesting point. I'm going to grant your motion for privilege, but I'm going to suggest to you that there might be a strong argument to be made that those questions opened some of the door. I'm going to let the judge decide that. But you can go ahead, ask the questions, we'll put it on the record for later determination, and it's going to force, to be blunt, this among other things may force the witness to come back and complete the deposition. Just let's be aware of that.

Menninger Decl., Ex. H at 205:15-206:10.

This testimony directly placed Plaintiff's attorney-client communications and work product at issue in the Dershowitz Case. Edwards and Cassell took the affirmative position that Dershowitz's statements that Edwards and Cassell helped Plaintiff fabricate her stories were false and defamatory. *See* Menninger Decl., Ex E, p. 2 ("Dershowitz went so far as to repeatedly accuse Edwards and Cassell of criminal misconduct in actively suborning perjury and fabricating the allegations of misconduct against him - acts that would warrant their disbarment from the legal profession. . . . Put simply, Dershowitz has made highly defamatory allegations that have no basis in fact"). Communications between Plaintiff and her attorney were a central issue in the claims brought by Edwards and Cassell, and Plaintiff voluntarily testified regarding those communications.

Plaintiff was acutely aware of how the information was being utilized in the Dershowitz Case. According to Plaintiff, she is a party to a joint defense or common interest agreement with Messrs. Edwards and Cassell. When the Dershowitz Case was filed, a mere week after the filing of the Joinder Motion on Plaintiff's behalf, Edwards and Cassell represented Plaintiff, who Dershowitz had also threatened to sue. Thus, Edwards and Cassell allegedly act both as Plaintiff's attorneys and her joint-defense or common interest partners. Plaintiff was aware that what was, or in this case was allegedly not, said between her and her attorney would be affirmatively used by her counsel/joint defense partners in support of their claims. She authorized the disclosure and testified, both with the assistance of McCawley.

Plaintiff, on behalf of her joint defense partners, provided evidence to support the factual claim neither Edwards or Cassell (nor anyone else) asked Plaintiff to lie about her stories of alleged sexual abuse and trafficking. The only way the truth of that issue can be tested is through the examination of all her communications about her stories, with attorneys or otherwise. *See Bowne v. AmBase Corporation*, 150 F.R.D. 465, 488 (S.D.N.Y.1993), *aff'd by* 161 F.R.D. 258 (S.D.N.Y.1995) (otherwise privileged communications put in issue where party “asserts a factual claim the truth of which can only be assessed by examination of a privileged communication”); *United States v. Bilzerian*, 926 F.2d 1285, 1292 (2d Cir.1991) (“[a] defendant may not use the privilege to prejudice his opponent's case or to disclose some selected communications for self-serving purposes. Thus, the privilege may implicitly be waived when defendant asserts a claim that in fairness requires examination of protected communications.”); *In re von Bulow*, 828 F.2d at 101–02 (“[I]t has been established law for a hundred years that when the client waives the privilege by testifying about what transpired between her and her attorney, she cannot thereafter insist that the mouth of the attorney be shut. From that has grown the rule that testimony as to part of a privileged communication, in fairness, requires production of the remainder.”); *United States v. Schmidt*, 105 F.3d 82, 89 (2d Cir. 1997) (criminal defendant who testified that she was never advised by her attorney of the fifth amendment implications of proceeding *pro se* put at issue all communications with her former attorney and her knowledge of the law as informed by her attorney-client communications).

“[T]he attorney-client privilege cannot at once be used as a shield and a sword. . . . A defendant may not use the privilege to prejudice his opponent's case or to disclose some selected communications for self-serving purposes.” *Bilzerian*, 926 F.2d 1285, 1292 (2d Cir. 1991) (internal citations omitted); *Locascio*, 357 F.Supp.2d 536, 550 (E.D.N.Y. 2004) (“The privilege

may not simultaneously be used as a shield and a sword; where a defendant opens the door by waiving the attorney-client privilege, . . . the [party] cannot open the door only to the information he would like to admit.”) Plaintiff has used her attorney communications as a sword on behalf of her joint defense partners, and therefore her communications with her attorneys are no longer shielded.

Plaintiff also testified that she shared her conversations and communications with Edwards to unrelated third parties. In particular, she shared her communications with a reporter for the Daily Mail Online, Sharon Churcher. *See* Menninger Decl., Ex. K, at 297:5-300:6. There is no doubt that sharing attorney-client communications with a third-party, particularly when that third party is a member of the press, acts to waive any claim of privilege. *Schaeffler v. United States*, 806 F.3d 34, 40 (2d Cir.2015). (“A party that shares otherwise privileged communications with an outsider is deemed to waive the privilege by disabling itself from claiming that the communications were intended to be confidential.”).

b. Edwards and Cassell’s Waivers of Attorney-Client and Work Product Privilege in the Dershowitz Case

In addition to Plaintiff’s direct waiver, Plaintiff’s counsel/joint defense partners Edwards and Cassell waived both attorney-client privilege and protection of their work product by putting those matters at issue in the Dershowitz Case. The scope of the subject matter put at issue in the Dershowitz Case could not be broader. Edwards and Cassell pleaded and argued at every conceivable turn that: 1) they had a good faith belief that Ms. Giuffre’s allegations – communicated to them by Giuffre -- were true; 2) they conducted a thorough investigation of Ms. Giuffre’s claims (their work product regarding Plaintiff and her allegations); 3) that Ms. Giuffre and her story were credible; 4) they did not have any communications or encourage

Plaintiff to fabricate facts or portions of her stories; and 5) they were not motivated in taking their actions by potential financial gain . Edwards and Cassell point to both communications with Plaintiff and their own work product in an attempt to prove their claims.

By way of example, in the Motion for Summary Judgement in the Dershowitz Case, Edwards and Cassell make the following assertions, citing attorney-client-privileged communications and work product documents in support of their claims and defenses:

- “Ms. Giuffre has submitted a sworn affidavit, not only attesting to the truthfulness of her allegations against Dershowitz but also about the fact that she told her lawyers about these claims.” (emphasis supplied) (attorney-client communications);
- “The assertions of sexual abuse are more than adequately corroborated by compelling circumstantial evidence which is detailed at length by Cassell in his deposition.” (work product/investigations);
- “Regardless of whether Dershowitz sexually abused Ms. Giuffre, Edwards and Cassell clearly had a good faith basis for relying on the sworn representations of their client.” (attorney-client communications, attorney thought process);
- “Edwards and Cassell had clearly conducted extensive investigation into the basis for Ms. Giuffre's allegations” (work product);
- “the undisputed record evidence establishes that Edwards and Cassell had every right following their detailed investigation to rely on Ms. Giuffre's credibility” (attorney-client communication, work-product and investigations, thought process and credibility assessments);
- “The good faith basis for Edwards and Cassell's reliance on Giuffre's allegations is laid out in detail by Professor Cassell in more than 50 pages of sworn testimony during his deposition. *See* Depo. Transcript of Paul Cassell (Oct. 16 & 17, 2015), at 61-117 (Exhibit #3)” (attorney investigative activities, work-product and attorney thought process based on what they “knew” through attorney-client communications).
- “Edwards and Cassell clearly had a powerful basis for believing their client's allegation that she had been sexually abused by Dershowitz, particularly where she had made this allegation to them as far back as 2011” (attorney-client communications)
- “Dershowitz made false and defamatory statements by alleging that two experienced and capable attorneys who thoroughly investigated and believed Ms. Giuffre's allegations in good faith should be disbarred” (work-product, investigation of alleged acts and investigation of credibility).

Menninger Decl., Ex E, at 1-13.

In addition to the Motion for Summary Judgment, Mr. Cassell in his deposition spent more than 50 pages detailing the investigations and assessment of all of the evidence used as a factual basis for the Joinder Motion in the CVRA Case on behalf of Plaintiff. Menninger Decl., Ex. L at 61-117. During this soliloquy, Cassell details his and Edwards thought processes in assessing the claims, their evaluation of the evidence they reviewed, and all other information that he had to believe Plaintiff's stories. He specifically refers to Plaintiff, their evaluation of the evidence in light of the information they "knew" about Plaintiff, and their evaluation and thought process of how the evidence supported her stories. Of course, the information they "knew" about Plaintiff was a direct result of her attorney-client communications with them, and their evaluation of that evidence in the case is clearly work product. In reciting the work product he believes supports "Virginia's" story, Cassell states that this is "important to Virginia" and "I want to do a good job for Virginia Roberts on -- on representing all the -- the evidence that is available to support her." Menninger Decl., Ex. L at 102:1-3 & 118:7-8. Having put these matters directly at issue, and utilizing both their work-product and attorney-client communications in support of the claims, there is a complete waiver of protection over 1) the content of communications between Plaintiff and her attorneys, and 2) her attorneys' work product and thought process in investigating and "reasonable belief" in the claims.³

³ In a joint press release relating to the settlement of the *Dershowitz Case*, Plaintiff and her attorneys again affirmatively cite to Plaintiff's communications with them, their investigation of her statements, and their assessment of her credibility. The references include the time frame prior to their initial filing as well as information discovered throughout the course of the Dershowitz Cases. In that press release, Edwards and Cassel stated "Edwards and Cassell maintain that they filed their client's allegations in good faith and performed the necessary due diligence to do so, and have produced documents detailing those efforts." *Menninger Decl.*, Ex. M, p.1. The press release continues in stating that it was a "mistake" to have filed sexual misconduct allegations against Dershowitz citing, among other things, "the records and other documents produced by the parties." *Id.* at 2. These public statements provide a further waiver over the work product that led to the public acknowledgement that filing the lawsuit and reliance on Plaintiff's allegations was a "mistake."

c. The elements for finding an at issue waiver are satisfied

As discussed above, “courts have generally applied the [at issue] doctrine liberally, finding a broad waiver of attorney-client privilege where a party asserts a position “the truth of which can only be assessed by examination of the privileged communication.” *Bank Brussels Lambert*, 210 F.R.D. at 508. All of the factors for waiver have been met: “(1) assertion of the privilege was a result of some affirmative act, such as filing suit, by the asserting party; (2) through this affirmative act, the asserting party put the protected information at issue by making it relevant to the case; and (3) application of the privilege would have denied the opposing party to information vital to his defense.” *Id.* 210 F.R.D. at 509-10. Here, Edwards and Cassell, with the full knowledge and consent of Plaintiff, took the affirmative act of filing and participating in the Dershowitz Case. Through this affirmative act, they put at issues what Plaintiff told her attorneys, whether it was true, whether her attorneys helped her concoct additional allegations that would help her position, whether they adequately investigated her claims, their basis for believing Plaintiff was credible, and if they and their client were motivated to file false claims by a desire for financial gain.

As discussed above, Plaintiff voluntarily and affirmatively waived the attorney-client privilege through her testimony. That alone is sufficient to find an at issue waiver. Plaintiff also permitted the waiver of the attorney-client privilege by permitting Edwards and Cassell to put her communications with them and her attorneys’ work product at issue with her full knowledge and consent. Plaintiff is a party to a joint defense agreement with Edwards and Cassell. She and her attorneys were involved in communication about the Dershowitz Case beginning in January 2015. The case was preemptively filed to beat Dershowitz to the courthouse, before he could act on his public statements that he intended to sue both Plaintiff and her attorneys for, among other

things, defamation. Plaintiff did nothing to stop her counsel from filing the Complaint, despite the fact that it would necessarily put her communications with her counsel at issue. And, she actively participated in the litigation. Indeed, the testimony of Cassell makes clear that the purpose of the litigation was for Plaintiff's benefit, and that he wanted to do a "good job" for her.

Normally, an attorney cannot waive the attorney-client privilege without his client's knowledge and consent. *In re von Bulow*, 828 F.2d at 101. But, "[a] client may nonetheless by his actions impliedly waive the privilege or consent to disclosure." *Id.*, 828 F.2d 94, 101 (2d Cir. 1987) (citing *See United States ex rel Edney v. Smith*, 425 F.Supp. 1038, 1052 (E.D.N.Y. 1976) (implied waiver), *aff'd*, 556 F.2d 556 (2d Cir.), *cert. denied*, 431 U.S. 958 (1977); *Drimmer v. Appleton*, 628 F.Supp. 1249, 1252 (S.D.N.Y.1986) (implied consent); *Wigmore, supra*, § 2327)). In certain circumstances, an attorney may have "an implied authority to waive the privilege on behalf of his client." *Drimmer*, 628 F.Supp. at 1251; *see also In re von Bulow*, 828 F.2d at 101. "It is the client's responsibility to ensure continued confidentiality of his communications." *Id.* If a client is aware of her attorney's waiver of privilege and takes no action to preserve confidentiality, the privilege is lost. *Id.*; *In re Horowitz*, 482 F.2d 72, 82 (2d Cir.), *cert. denied*, 414 U.S. 867 (1973) ("[i]t is not asking too much to insist that if a client wishes to preserve the privilege under such circumstances, he must take some affirmative action to preserve confidentiality").

This situation is analogous to a client asserting advice of counsel as a defense, a situation in which an at issue waiver of the full scope of attorney-client communications is automatic. *See Bilzerian*, 926 F.2d at 1292 (defendant's testimony that he thought his actions were legal would have put his knowledge of the law and the basis for his understanding of what the law required into issue, directly implicating his conversations with counsel); *Chin v. Rogoff & Co., P.C.*, No.

05 CIV. 8360(NRB), 2008 WL 2073934, at *6 (S.D.N.Y. May 8, 2008) (in suit for damages against tax advisor for negligence in providing tax advice, reliance and causation could only be assessed through invading the attorney-client privilege and examining the nature of counsel's advice to determine different advice was given by attorneys). The at issue waiver is complete "even if a party does not attempt to make use of a privileged communication" *Bowne of New York City, Inc. v. AmBase Corp.*, 150 F.R.D. 465, 488 (S.D.N.Y. 1993) (*discussing Bilzerian*, 926 F.2d 1285); *Chin*, 2008 WL 2073934, at *6 (waiver occur even where client does not reference attorney communications if review of communications is necessary to establish an element of a claim). Here, Edwards and Cassell put the issue of their "good faith" reliance on Plaintiff's communications to them affirmatively at issue, as well as their investigation of what she told them in those communications. Having done so with Plaintiff's knowledge and consent, and without her protest, the waiver is complete.

The application of the privilege here, after it has been selectively waived, denies Ms. Maxwell information vital to her defense. By way of very limited example, in the case at bar, Plaintiff claims that she was defamed when Ms. Maxwell stated that the allegations Plaintiff made in the Joinder Motion, included allegations regarding Dershowitz, Ms. Maxwell and Prince Andrew, were false. In the Joinder Motion Edwards and Cassell boldly state "Epstein required Jane Doe #3 to have sexual relations with Dershowitz on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands." Menninger Decl., Ex. C at 4. Edwards and Cassell, however, had doubts about Plaintiff's allegations based on their own investigation, including whether Dershowitz and Plaintiff were ever on Epstein's plane together. Cassell identified flight logs Edwards and he reviewed as supporting the allegations made by Plaintiff. Menninger Decl., Ex. L at 69-70. He

admits, however, that there is not a single log entry that put Dershowitz and Plaintiff on the same plane.⁴ Having put at issue their investigation and “good faith belief” in Plaintiff’s stories, they must provide all information about anything that both supports *and* undermines Plaintiff’s story and their own belief in the credibility of that story.

Plaintiff will undoubtedly attempt to prop-up her claims that she was telling the truth through use of the investigative material, work product, mental impressions and opinions on her credibility offered by her attorneys/joint defense partners, Edwards and Cassell. Ms. Maxwell cannot be denied access to information showing her attorney’s work and investigation shows Plaintiff’s stories were fabricated, including the details uncovered demonstrating Plaintiff’s lack of credibility.

Each of the factors considered by the Second Circuit to find a broad waiver weighs in favor of finding such a waiver here. The factors are “(1) whether substantive information has been revealed; (2) prejudice to the opposing party caused by partial disclosure; (3) whether partial disclosure would be misleading to a court; (4) fairness; and (5) consistency.” *McGrath v. Nassau Cty. Health Care Corp.*, 204 F.R.D. 240, 244.

Cassell and Edwards have revealed in extensive detail their work-product demonstrating why they believed Plaintiff’s allegations and incorporated them in the Joinder Motion. It would be prejudicial for Plaintiff to be able to support her claim in this case that she is not a liar using her attorney’s testimony and work product, while preventing discovery of work-product and communications that would prove otherwise or cast doubts on Plaintiff’s credibility. It would be

⁴ My question, Mr. Cassell, is: You reviewed the flight logs, correct?

A. Correct.

Q. You reviewed them in some detail, correct?

A. Correct.

Q. Is there any entry on those flight lines -- logs that you read as putting Professor Dershowitz and Miss Roberts on the same plane?

A. No.

Menninger Decl., Ex. L 206:3-11.

misleading to the court or any jury to hear testimony from Plaintiff's counsel about all the factual basis, work product and thought process on which they relied in making the allegations in the Joinder Motion, but refusing to permit Ms. Maxwell discovering or presenting contradicting information that Plaintiff's attorneys had, including information that led them to conclude that it was a "mistake" to have filed sexual misconduct allegations against Dershowitz. Fairness and consistency require that Plaintiff and her attorneys be required to disclose all work product and attorney-client communications relating their investigations of Plaintiff's statements and story as alleged in the CVRA Case, their investigations of the allegations, their assessment of the credibility of the allegations, and contradictory evidence uncovered.

III. There is No Privilege as to Communications with Scarola

Plaintiff listed on her privilege log Jack Scarola, Edwards and Cassell's attorney, as an individual who received or sent communications or documents relating to the CVRA Case. The log does not state what these documents are, instead including them as part of the "categorical" logging. The "Types of Privileges" identified are Attorney Client, Work Product, and Joint Defense/Common Interest. It is entirely unclear how any of these protections can be invoked regarding communications including Scarola or over documents provided by or to him.

a. There is no Attorney-Client Relationship

Plaintiff specifically states in her interrogatory responses that Scarola is not and has never been her attorney. Thus, there can be no attorney-client-communications between Plaintiff and Scarola. If there were, Plaintiff has clearly and voluntarily waived any privilege.

b. Work Product Privilege has been Waived

In 2011, Scarola acted as Edward's attorney in a case captioned *Epstein v. Edwards*, Case No. 502009CA040800XXXMB, in the Circuit Court for the Fifteenth Judicial Circuit, Palm Beach County, Florida (the "Epstein v. Edwards Case."). That action is still pending. According to the most recent discovery responses, Edwards represented Plaintiff in the CVRA Case at the same time. *SOF*, ¶(d).

On April 7, 2011, Edwards, Scarola and Plaintiff had a telephone conversation, recorded with the knowledge and consent of Plaintiff. Menninger Decl., Ex N at 1. The content of the conversation is a detailed interview of Plaintiff recounting her story of her time with Epstein. The transcript of that conversation, clearly marked "Work Product," has been produced widely and attached to multiple court filings. It was used affirmatively in the Epstein v. Edwards Case and filed on May 17, 2011 in that case. *See* Menninger Decl., Ex. O (Notice of Filing). It was also used affirmatively in the CVRA Case. *See* Menninger Decl., Ex. P, DE #290, Exhibit 3. It was produced in this case and in the Dershowitz Case by Plaintiff and her counsel. *See* Menninger Decl., Ex. Q. It apparently was also transmitted to the press. *See* Menninger Decl., Ex. J.

As discussed above, putting information contained in this "work product" document at issue waives of any protection and extends to any and all work product of Scarola related to Plaintiff or her claims and stories.

c. There is no basis to claim common interest or joint defense privilege

It bears repeating that "[t]he party asserting the privilege ... bears the burden of establishing its essential elements." *Mejia*, 655 F.3d at 132; *see also Wultz v. Bank of China Ltd.*,

304 F.R.D. 384, 391 (S.D.N.Y.2015) (“The party invoking the privilege also has the burden to show that the privilege has not been waived.”).

Plaintiff provides no basis for claiming a common interest or joint defense with *anyone* related to the CVRA case. The only two people Scarola represents, to Ms. Maxwell’s knowledge, are Edwards and Cassell. They are the attorneys in the CVRA case, and by definition should not have a personal or common interest with the parties in that litigation. Regardless, it is Plaintiff’s burden to establish that such an interest exists, who is involved, and Scarola’s role. Having failed to provide any of the information necessary to establish the applicability of these privileges, they are waived. *See S.E.C. v. Yorkville Advisors, LLC*, 300 F.R.D. 152, 162 (S.D.N.Y. 2014) (failure to provide adequate descriptions of the subject matter, authors and recipients of the withheld documents resulted in waiver of privilege). There is simply no basis for withholding any communication with or work product of Scarola.

CONCLUSION

Plaintiff and her lawyers waived any privilege as to their communications related to the subject matters of (a) the CVRA litigation and (b) the *Edwards and Cassell v. Dershowitz* Case. Similarly, Plaintiff’s lawyers waived any claim of work product to material gathered in relation to those litigations.

Accordingly, Ms. Maxwell requests that the Court enter an order finding (a) a waiver of the attorney-client privilege as to the subject matter of the CVRA and Dershowitz litigations and (b) a work product exemption for materials gathered in relation to those matters. She further requests an Order directing Plaintiff to provide Ms. Maxwell with all documents as to which such the attorney-client privilege and work product have been waived.

Dated: May 26, 2016.

Respectfully submitted,

/s/ Laura A. Menninger

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Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on May 26, 2016, I electronically served this *Motion to Compel all Communications and Work Product Put At Issue by Plaintiff and Her Attorneys* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration Of Laura A. Menninger In Support Of
Motion To Compel All Attorney-Client Communications and Attorney
Work Product Placed At Issue by Plaintiff and Her Attorneys**

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell (“Maxwell”) in this action. I respectfully submit this declaration in support of Ms. Maxwell’s Motions to Compel All Attorney-Client Communications and Attorney Work Product Placed At Issue by Plaintiff and Her Attorney.
2. Attached as Exhibit A is a true and correct copy of excerpts categorically logged entries from Plaintiff Giuffre's Revised Supplemental Privilege Log dated April 29, 2016.
3. Attached as Exhibit B is a true and correct copy of Plaintiff Giuffre’s Discovery Second Amended Supplemental Response to Interrogatory No. 3 concerning her attorney representations, dated April 29, 2016.

4. Attached as Exhibit C (filed under seal) is a true and correct copy of the Motion to Join in the *Jane Doe #1 and Jane Doe #2 v. United States*, Case No. 08-80736-CIV-Marra, United States District Court for the Southern District of Florida (“CVRA Case”) filed December 30, 2014.

5. Attached as Exhibit D is a true and correct copy of the Order in the CVRA Case dated April 6, 2015.

6. Attached as Exhibit E is a true and correct copy of the Motion for Summary Judgment in the *Edwards and Cassell v. Dershowitz*, Case No. 15-00072, In and for the Seventeenth Judicial District, Broward County, Florida (“Dershowitz Case”) dated November 25, 2015.

7. Attached as Exhibit F is a true and correct copy of the Complaint in the Dershowitz Case dated January 6, 2015.

8. Attached as Exhibit G is a true and correct copy of the Notice of Serving Answers to Interrogatories in Dershowitz Case dated March 13, 2015.

9. Attached as Exhibit H (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in the [REDACTED] matter on January 16, 2016, and designated by Plaintiff as Confidential under the Protective Order.

10. Attached as Exhibit I is a true and correct copy of the Declaration of Virginia Giuffre in the Dershowitz Case dated November 20, 2015.

11. Attached as Exhibit J (filed under seal) is a true and correct copy of Email correspondence with Churcher re: Edwards Privilege communication.

12. Attached as Exhibit K (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in the above captioned matter on May 3, 2016, and designated by Plaintiff as Confidential under the Protective Order.

13. Attached as Exhibit L is a true and correct copy of the October 16, 2015 Deposition of Paul G. Cassell taken in the *Edwards and Cassell v. Dershowitz*, In and for the Seventeenth Judicial District, Broward County, Florida matter.

14. Attached as Exhibit M is a true and correct copy of the press release issued by the parties in the Dershowitz Case on April 8, 2016.

15. Attached as Exhibit N is a true and correct copy of the interview of Virginia Roberts by Edwards and Scarola in the *Epstein v. Rothstein, Edwards, and L.M.*, In and for the Fifteenth Judicial District, Palm Beach County, Florida (“Epstein Case”).

16. Attached as Exhibit O is a true and correct copy of the May 17, 2011 Notice of Filing of the interview in the Epstein Case.

17. Attached as Exhibit P is a true and correct copy of a portion of the ECF Docket Sheet in the CVRA Case.

18. Attached as Exhibit Q is a true and correct copy of the document produced by Plaintiff in this matter as GIUFFRE000862-000887.

By: /s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on May 26, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Motion To Compel All Attorney-Client Communications and Attorney Work Product Placed At Issue by Plaintiff and her Attorney* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons

EXHIBIT J

To: Brad Edwards[brad@pathtojustice.com]
Cc: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Thur 6/9/2011 9:41:33 PM
Importance: Normal
Subject: Fw:
Received: Thur 6/9/2011 9:41:33 PM

Hello,

Please see below message from a paper in London. I don't know how they got this info, but it's a bit frightening to me. What do you think?

Thanks,
Jenna

-- On Thu, 9/6/11, Sandra White <[REDACTED]> wrote:

From: Sandra White <[REDACTED]>
Subject:
To: [REDACTED]
Received: Thursday, 9 June, 2011, 4:37 PM

Hi Virginia

This was in the Daily telegraph here today and followed up by other papers. Did you know about it?
s x

Question Duke of York over sex abuser, says victim

The Duke of York "knows the truth" about the sexual abuse of under-age girls by his friend Jeffrey Epstein and should be made to testify about him, a former "sex slave" of the billionaire financier has claimed.



Jeffrey Epstein Photo: REX



By Jon Swaine

6:30AM BST 09 Jun 2011

GIUFFRE004875
CONFIDENTIAL

Virginia Roberts told lawyers in Florida that the Duke could give a "valuable" insight into the behaviour of Epstein, a convicted sex offender.

She said she was afraid to name friends of Epstein whom she was made to massage because some were "influential" and she was "scared".

Miss Roberts, who was born in California, alleges that, from the age of 15, she was paid to follow Epstein around the world and be sexually exploited by him and his "adult male peers, including royalty".

She was one of at least 17 women anonymously to settle lawsuits with the former Wall Street money manager after alleging in a criminal inquiry in 2005 that he had abused them as under-age girls.

Epstein was sentenced to 18 months in prison in 2008 after admitting soliciting prostitution and soliciting a minor for prostitution.

Miss Roberts, who is now 27 and lives in Australia with her young family, revived the case in February when she admitted she was "Jane Doe 102" and claimed she had met the Duke three times.

She was interviewed last month by a lawyer for a Florida attorney who represents several of the alleged victims and is being sued by Epstein, who claims the cases against him are bogus. She was read a short list of Epstein's male friends and asked which "would have relevant information about Jeffrey's taking advantage of under-age girls" if they were asked to give "sworn testimony".

"Prince Andrew," suggested the lawyer, Jack Scarola. "Yes, he would know a lot of the truth," she said.

"I don't know how much he would be able to help you with. But seeing he's in a lot of trouble himself these days ... I think he may be valuable. I'm not too sure of him."

Miss Roberts described how she was made to gratify Epstein sexually, and that he paid her to do the same to about eight of his male friends. "Are you able to name those people for me?" asked Mr Scarola. "No, not at this stage," she said. "I just, some of these people are really influential in power ... I'm just afraid to say it to you." She added: "I'm really scared of where this is gonna go."

Asked about Epstein's friendship with the Duke, Miss Roberts said: "I am angry about how they are still up to their old ways together and that they're still hanging out."

The pair were pictured walking in Central Park in New York in December. It was later claimed that the Duke was asking Epstein to help pay £15,000 of the debts of his former wife, Sarah Ferguson.

Miss Roberts indicated she had given fresh evidence to FBI agents, who are looking again at Epstein's case.

There is no suggestion that the Duke of York has done anything wrong. Epstein's attorney did not respond to a request for comment.

A source close to the Duke of York stressed that he had no involvement with young girls and insisted that he had "no knowledge whatsoever" of Mr Epstein's activities until they appeared in the media.

To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Thur 6/9/2011 11:59:52 PM
Importance: Normal
Subject: Re: draft...how about this?
Received: Thur 6/9/2011 11:59:52 PM

Sorry took so long to reply, my computer was frozen. I think it's absolutely perfect...thank you for sending me this. I found the "Telecon Interview" and it says nothing about being a sworn statement or testimony, and whoever published that article took the phrase about [REDACTED] straight out of my captions. Not cool!!
Anyways I am sending this to Brad right now...Many Thanks!!!

Jenna

--- On Thu, 9/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: draft...how about this?
To: "Virginia Giuffre" [REDACTED]
Received: Thursday, 9 June, 2011, 11:34 PM

Hi Brad,

I am very upset about the fact that a purported account of an off-the-cuff conversation I believed was confidential has been filed without my knowledge or approval in a court of law.

I understood that all conversations between us were governed by attorney-client privilege. Please advise me if this is correct.

I recall telling you and Mr. Scarola I did not wish to be involved in the proceedings in which my purported statement has been filed. I thought when you put me on the phone to him that I was giving him some confidential help as a favour to you.

I am grateful for your decision to accept me as a client but I must ask that the purported statement be withdrawn from the record.

If you continue to represent me – and I hope that you will – I must request that you inform me in writing of any filings in which my name is involved and send them to me for prior review to ensure that they are accurate.

Sincerely,

Virginia Roberts

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Fri 6/10/2011 12:15:55 AM
Importance: Normal
Subject: RE: draft...how about this?
Received: Fri 6/10/2011 12:15:55 AM

Too late, but i don't think he'll catch on anyways. I changed a few words around so it sounds more like a unprofessional 20 something year old. Lets see what he sends back. Will let you know. Thanks Matie!!!
xoxox Jenna

--- On Fri, 10/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: RE: draft...how about this?
To: "Virginia Giuffre" [REDACTED]
Received: Friday, 10 June, 2011, 12:02 AM

Take the o out of favour! Gives me away!!!

From: Virginia Giuffre [REDACTED]
Sent: 09 June 2011 20:00
To: Sharon Churcher
Subject: Re: draft...how about this?

Sorry took so long to reply, my computer was frozen. I think it's absolutely perfect...thank you for sending me this. I found the "Telecon Interview" and it says nothing about being a sworn statement or testimony, and whoever published that article took the phrase about Andrew straight out of my captions. Not cool!!

Anyways I am sending this to Brad right now...Many Thanks!!!

Jenna

--- On Thu, 9/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: draft...how about this?
To: "Virginia Giuffre" [REDACTED]
Received: Thursday, 9 June, 2011, 11:34 PM

Hi Brad,

I am very upset about the fact that a purported account of an off-the-cuff conversation I believed was confidential has been filed without my

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knowledge or approval in a court of law.

I understood that all conversations between us were governed by attorney-client privilege. Please advise me if this is correct.

I recall telling you and Mr. Scarola I did not wish to be involved in the proceedings in which my purported statement has been filed. I thought when you put me on the phone to him that I was giving him some confidential help as a favour to you.

I am grateful for your decision to accept me as a client but I must ask that the purported statement be withdrawn from the record.

If you continue to represent me – and I hope that you will – I must request that you inform me in writing of any filings in which my name is involved and send them to me for prior review to ensure that they are accurate.

Sincerely,

Virginia Roberts

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July 30, 2020

VIA ECF

The Honorable Loretta A. Preska
District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Giuffre v. Maxwell*,
Case No. 15-cv-7433-LAP

Dear Judge Preska,

Pursuant to the Court's orders dated July 28, 29, and 30, 2020 (ECF Nos. 1077, 1079, and 1087), Plaintiff files the documents listed in Exhibit A to Plaintiff Virginia Giuffre's Opposition to Defendant Ghislaine Maxwell's Objections to Unsealing Docket Entries 143, 164, 172 199, and 230 (ECF No. 1068-1), as attachments hereto.

Plaintiff will file "Ms. Maxwell's and Doe 1's deposition transcripts and any sealed materials that quote or disclose information from them . . . on Monday, August 3, 2020, subject to any further stay ordered by the Court of Appeals." ECF No. 1079 at 3-4.

Sincerely,

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)

United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

DECLARATION OF SIGRID S. McCawley IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO ANSWER
DEPOSITION QUESTIONS FILED UNDER SEAL

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's September 29, 2015 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in support of Plaintiff's Motion to Compel Defendant To Answer Deposition Questions Filed Under Seal.

3. Attached hereto as Exhibit 1, is a true and correct copy of page 21 of Defendant Maxwell's April 22, 2016 Deposition transcript.

4. Attached hereto as Exhibit 2, are true and correct copies of pages 19-22 of Defendant Maxwell's April 22, 2016 Deposition transcript.

5. Attached hereto as Exhibit 3, is a true and correct copy of the Palm Beach police report.

6. Attached hereto as Exhibit 4, are true and correct copies of pages 60-62 of Defendant Maxwell's April 22, 2016 Deposition transcript.

7. Attached hereto as Exhibit 5, is a true and correct copy of page 82 of Defendant Maxwell's April 22, 2016 Deposition transcript.

8. Attached hereto as Composite Exhibit 6, are true and correct copies of pages 52-55; 64-65; 82; 92-93; 137-38; 307-09 of Defendant Maxwell's April 22, 2016 Deposition transcript.

9. Attached hereto as Exhibit 7, is a true and correct copy of page 51 of Defendant Maxwell's April 22, 2016 Deposition transcript.

I declare under penalty of perjury that the foregoing is true and correct.



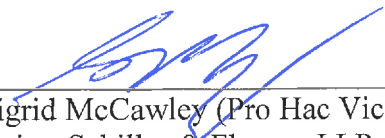
Sigrid S. McCawley, Esq.

Dated: May 5, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By:



Sigrid McCawley (Pro Hac Vice)
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite
1200 Ft. Lauderdale, FL 33301
(954) 356-0011

David Boies
Boies, Schiller & Flexner LLP
333 Main Street
Armonk, NY 10504

Ellen Brockman
Boies, Schiller & Flexner LLP
575 Lexington Ave
New York, New York 10022
(212) 446-2300

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 5, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

Laura A. Menninger, Esq.
Jeffrey Paliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmessenger@hmflaw.com



Sigrid S. McCawley, Esq.

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**NON-REDACTED DECLARATION OF SIGRID S. McCAWLEY IN SUPPORT OF
PLAINTIFF'S MOTION TO EXCEED PRESUMPTIVE TEN DEPOSITION LIMIT IN
FEDERAL RULE OF CIVIL PROCEDURE 30(A)(2)(a)(ii), FILED UNDER SEAL**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's September 29, 2015 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in support of Plaintiff's Motion to Exceed Presumptive Ten Deposition Limit In Federal Rule of Civil Procedure 30(A)(2)(a)(ii), Filed Under Seal.
3. Attached hereto as Composite Exhibit 1, is a true and correct copy of the May 17, 2016 Email Correspondence from Sigrid McCawley.
4. Attached hereto as Exhibit 2, is a true and correct copy of the May 27, 2016 Email Correspondence from Laura Menninger.
5. Attached hereto as Exhibit 3, is a true and correct copy of the Notice of Service

and Subpoena to Juan Alessi.

6. Attached hereto as Exhibit 4, is a true and correct copy of the May 26, 2016 Correspondence from Sigrid McCawley.

7. Attached hereto as Exhibit 5, is a true and correct copy of the [REDACTED]

8. Attached hereto as Composite Exhibit 6, is a true and correct copy of the April 22, 2016 Deposition Transcript of Ghislaine Maxwell.

9. Attached hereto as Exhibit 7, is a true and correct copy of the Palm Beach Police Report.

10. Attached hereto as Exhibit 8, is a true and correct copy of the November 21, 2005 Sworn Statement of Juan Alessi.

11. Attached hereto as Exhibit 9, is a true and correct copy of the May 4, 2016 Email Correspondence from Laura Menninger.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Dated: May 27, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
Sigrid McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
Boies, Schiller & Flexner LLP 401 E.
Las Olas Blvd., Suite 1200 Ft.
Lauderdale, FL 33301
Tel: (954) 356-0011

David Boies
Boies, Schiller & Flexner LLP 333
Main Street
Armonk, NY 10504

Bradley J. Edwards (Pro Hac Vice)
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Tel: (954) 524-2820

Paul G. Cassell (Pro Hac Vice)
S.J. Quinney College of Law
University of Utah
383 University St.
Salt Lake City, UT 84112
Tel: (801) 585-5202¹

¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 27, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

Laura A. Menninger, Esq.
Jeffrey Paliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmenninger@hmflaw.com
jpagliuca@hmflaw.com

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration Of Laura A. Menninger In Support Of Defendant’s Response in
Opposition to Extending Deadline to Complete Depositions and
Motion for Sanctions for Violations of Rule 45**

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell (“Maxwell”) in this action. I respectfully submit this declaration in support of Defendant’s Response in Opposition to Extending Deadline to Complete Depositions and Motion for Sanctions for Violations of Rule 45.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of excerpts from the Deposition of Rinaldo Rizzo on June 10, 2016, and designated by Plaintiff as Confidential under the Protective Order.

3. Attached as Exhibit B (filed under seal) is a true and correct copy of **The Billionaire Playboys Club book manuscript** drafted by Plaintiff, designated by Plaintiff as Confidential under the Protective Order

4. Attached as Exhibit C is a report by former FBI director, Louis Freeh.
5. Attached as Exhibit D (filed under seal) is a true and correct copy of excerpts of Plaintiff's deposition on May 3, 2016, and designated by Plaintiff as Confidential under the Protective Order.
6. Attached as Exhibit E are true and correct copies of May 23, 2016 correspondence from Meredith Shulz and May 25, 2016 correspondence from myself.
7. Attached as Exhibit F are true and correct copies of Notices of Subpoena with attachments for Jean Luc Brunel, served on February 16, 2016 and May 23, 2016, as well as correspondence regarding Mr. Brunel's deposition from counsel, Bradley Edwards.
8. Attached as Exhibit G is a Motion to Quash filed by counsel for Jeffrey Epstein in Broward County, Florida in *Edwards and Cassell v. Dershowitz*, Case No. 15-0000072 on September 10, 2015.
9. Attached as Exhibit H is a true and correct copy of the Notice of Deposition and Subpoena for Jeffrey Epstein, served on counsel on April 27, 2016.
10. Attached as Exhibit I are true and correct copies of the Notices of Deposition and Subpoena for Sarah Kellen and Nadia Marcincova, served on counsel on April 27, 2016.
11. Attached as Exhibit J (filed under seal) are true and correct copies of correspondence produced in this case between Ms. Maxwell and Jeffrey Epstein from January 2015, and designated as Confidential by Defendant under the Protective Order.
12. Attached as Exhibit K (filed under seal) are Notices of Deposition and Subpoena for [REDACTED], Joe Recarey and Michael Reiter and a letter of production from Sigrid McCawley of June 17, 2016, designated as Confidential by Plaintiff under the Protective Order.

13. Attached as Exhibit L (filed under seal) is the certificate of service for [REDACTED]
[REDACTED]

14. Attached as Exhibit M is a true and correct copy of my correspondence to Plaintiff's counsel of May 25, 2016.

15. Attached as Exhibit N is a Notice of Subpoena and Deposition for Sharon Churcher on June 16, and the certificate of service dated June 4.

By: */s/ Laura A. Menninger*

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on June 20, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Response in Opposition to Extending Deadline to Complete Depositions and Motion for Sanctions for Violations of Rule 45* via ECF on the following:

Sigrid S. McCawley
Meridith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflfp.com
mschultz@bsflfp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons

EXHIBIT B

The Billionaire's Playboy Club

By Virginia Roberts

To my true love Robbie who believes in me every step of the way and to all of my children, you are all my very inspirations!

Chapter 1

Every single person in this shared world together has a unique story of his or her own to tell, this one is mine.

It was coming up to my third night camping out at Miami Beach in the summer of 1997. I was thirteen years old and hiding from a world full of hurt. Sitting on the shoreline for hours watching the sunset fall deeper into the horizon, my eyes were glazed over with tears, not from being wind-whipped by the rough sea breeze, but from reflecting on the abuse I encountered as a young girl and how everyone in my life who was supposed to be there for me had now turned their backs on me in abandonment. My fears crept up and the excitement of escaping all of them faded now realizing how alone I really was now, and for the hunger that was painning my belly. At this point, with nowhere to go and only time to waste, I wiped the tears from my eyes and set out to find an empathetic person that I could manage to get dinner money from. If not, it wouldn't have been the first time I had gone hungry for the night. I walked to the nearest bus stop and asked a handful of people for any spare change, none of whom that could help me. Sitting down on a nearby curb disappointed in grief of my current state, I put my head into my knees and began to sob.

Out of nowhere, it seemed, a black stretch limousine turned the corner and stopped in front of the curb where I had been hopelessly lost. The back door opened to reveal a heavy weight and balding, old man with a big cheesy smile. Neatly dressed in black trousers and a collared shirt, he was sitting next to a striking young, blonde girl, drop dead beautiful and dressed in a foxy red mini dress she looked like a model just stepping off a runway.

Their smiles greeted me warmly and he kindly asked, "What is such a sweet little girl like you doing sitting alone on the street looking so upset?" Shocked from this strangers concern I was hesitant in telling him the truth. Reluctantly I decided to tell him that I was a runaway, not from around here and really hungry. Hoping at most, I would get some money for food from him. He instantly displayed a chilling excitement and offered me to come into his car so we could talk some more. That

should've been my first queue to get out of there quick but with no where to go, and so naïve I didn't realize how much worse it could get. Setting foot into that limo, I made my first entrance into a world that would entrap me for many years to come.

He introduced himself immediately as Ron Eppinger, a businessman and owner of a successful modeling agency, called "Perfect 10". Flaunting his oozing wealth by introducing one of his many girlfriends, the beauty next to him was Yana, a supposed model from the Czech Republic who looked like she could be in her early twenties with the heavy load of makeup she was wearing, but really was only in her late teens. She kissed me on both cheeks and politely said "Hello" in a thick Czech accent, making me feel a little more at ease. Convinced it couldn't be that bad there was another girl in the car, right? I couldn't be more wrong.

What he didn't tell me to begin with was that his modeling agency was only posing for an undercover trade. By the time I found out I thought it was too late to run. His business was really an illegal immigrant trafficking ring of young women mostly consisting of underage girls that he was using as escorts to make him uber rich. Only available to a selective clientele costing them anywhere from \$1000.00 and over per hour of erotic entertainment, the girls were trained to fulfill every sexual desire asked of them, no matter how bizarre the requests might be. The high paid escorts, for Ron's super rich clientele, such as Yana and many other charismatic beauties would only benefit a fraction of their earnings for themselves, Ron reaping in the majority of the financial rewards and being they were all illegal immigrants they were further trapped by his enslavement.

I proceeded to introduce myself, besides what he had found out about me on the curbside. Telling him my name and a little about how I ended up on the streets explaining that I could take care of myself and didn't need my family or anyone to look after me anymore. Looking back later in life I can now admit I was in a terrible state, but being such a headstrong teenager, I refused to give in. He asked my age and I told him I was sixteen at first. He coyly replied, "Are you sure? I think you could be telling me a fib? How old are you... really? I won't be mad?" Being a terrible liar, I knew had been caught out and couldn't deny it any further. I told him the truth and he chuckled then paused and answered in a very serious tone "As long as you never lie to me again I will take you in" Right away I pondered to myself what did he mean...take me in?

He gave the driver the location of our destination and rolled the middle window back up to then tell me a story of how his daughter had passed away seven years ago from a horrific car accident in which four other teens were killed and he has never gotten over it. I reacted with sheer

sympathy and gave him my pity, believing this man had a heart. His next proposal was eerie, he said, "If you wanted, I can be your new Daddy. Someone to take care of you and you'll be my new baby forever" he stroked my hair such as a caring parent would comfort a scared child. A part of me wanted to accept his words and believe he really could feel that way, and then I also considered how hard it was living on the streets. In the end I convinced myself this would be the lesser of two evils.

The car stopped at a plaza on the water, surrounded by little boutique shops, restaurants, and little stalls with items for sale like sunglasses and costume jewelry. I didn't know what to say or do or how to act, it all happened so fast I just went along with everything he said, for now.

We went to a take out restaurant and ate on the waterside, and afterwards he took me to G.A.P Kids co. to dress me in his idea of proper attire, tiny cutoff shorts revealing the cusp of my buttocks and some shirts that barely fit, even the sales assistant was shocked at what she thought was my Grandfather's choice in clothing. I couldn't even believe it myself only an hour ago I was begging for money living on the streets and now I was dining alfresco and shopping at name brand outlets. We then hit a couple of more specialty stores afterwards. He said he had to buy me a few more necessities to start with. Lacy G-strings and what looked to me like lingerie pieces I had only seen grown women wearing in magazine ad's or movies was now a part of my wardrobe, in my mind it was a big step up from being a little girl any longer.

The driver took us back to Ron's grand apartment overlooking the isle of Key Biscayne and a large bridge leading into a Miami Harbor. Entering his residence, I was blown away by the spectacular view, rich décor, and white marble floors that were so glossy it looked as if I was stepping on glass. He took my shopping bags to a large room at the back of the apartment and put them into a small closet. The room was considerably large with glass exterior walls that maximized the potential of the panorama landscape soaking in the seascape of Miami. In the room was a gigantic round bed raised off the floor by three steps and mirrors on the ceiling. It looked like a honeymoon suite out of a raunchy hotel. He then exclaimed, "This is my room here and you will be sharing it with me" When I asked him where I would sleep he then sickly replied "With me silly, where else of course?" With no room for argument I pretended to be O.K with everything that my common sense was screaming out in my head to run.

Next I was taken down a long hall at the other end of the apartment to meet five more exotic beauties. Three girls were in their late teens and the other two in were in their early twenties. All of them were from the Czech, here under false passports provided by Ron and his contacts. Yana held my hand while introducing me to the group of girls as "Baby" a pet

name she came up with for me, being I was the youngest one among them or ever to be brought in by Ron for that matter. It became my new identity not even worrying to mention my real name to anyone anymore. My identity was no longer important to myself, I wanted to become someone new and "Baby" is who I was.

A shocking first impression, the girls were completely nude revealing their voluptuous young bodies with such a careless ease and others were in just a G-string, similar to the one's Ron had bought me earlier. They were all stunning girls and full of life. Charismatic and beautiful, they were the girls who should be on the front of billboards not selling their bodies to old crewed men for sex. Doing each other's make-up in front of the mirror and chatting away on the bed with no care in the world, aiming at persuading me to see the highlights of the life Ron gave them and they almost did. Ron left the room for a few moments, letting us all get to know each other a little better and that's when I started to compile an understanding of what really went on here.

Just catching a bit of their conversation from before my introduction, I heard them chatting about the night they were preparing for. Speaking excitedly about some men they would be entertaining in a few hours, one girl was talking about going out to sea with one of these clients on a yacht for a few days. Since none of the girls seemed shy to talk about their professions or anything for that matter, I decided to ask them a few questions about what they did. They were more than happy to expand on their point of view in the conversation, attempting to paint a pretty picture of what they were paid to do.

They all began to jump up and down with excitement like giddy school girls at a slumber party. Another girl with jet-black hair and a thick accent, wearing absolutely nothing at all, grabbed me onto the bed with them and into their fiasco, instantly making me feel accepted into their sorority, like I actually belonged somewhere for once. Yana went on to explain a little more in detail, "We accompany the wealthy friends of Ron. They want only beautiful girls by their side so we come and act however they want us too but most importantly we make them think we want them back too." Other girls began to jump in with their vivid points of view while playing with my hair, they were taking turns brushing and styling it as they were filling my head with all of the prospects I could have as an escort too. They made me feel beautiful like them, too beautiful for what a girl beyond my years should feel. I was simply being lured into a dangerous trap, just like they had been at a young age too.

It pretty much all came down to two things in their game, the money they would make and the lifestyle they were given. Their enthusiasm only interested me further, making it not only sound like an acceptable way of living but also appearing to keep them all vivaciously satisfied. This way

of life was just mind blowing to even comprehend at first. With such a new outlook of the world to try and grasp at my young age I was listening to every word spoken to me with such attentiveness, I was going to try and model what I was observing from the girls. I justified their way of thinking in my head for now, thinking if all these girls seem happy enough, why couldn't I try to be, it was this or the streets for me.

Ron came back for me not long after our conversation got out of hand and took me to a bathroom down the hall. He opened the tap and filled a small plastic cup with water and handed me two small blue oval pills. Telling me to take them both as they would help me to relax a little bit more. I swallowed the pills just following his orders. I put the cup on the counter top and turned back around to face him. Backing me up against the wall and now cornered by this large man I felt his slithering hands began to creep under my shirt, writhing my skin. I closed my eyes tightly and turned my head away from him, hoping he would take my actions as a sign of being extremely uncomfortable but that wouldn't bother him at all. He was half enjoying my reaction from the smug look on his face, and persisted through it.

Continuing to undress my clothes he said he wanted to look me over and clean me up. It was so humiliating having to expose myself to this ageing man and now I knew he was going to end up with his hands and whatever else all over me. All too soon I hated to be right, as I stood naked before his widened eyes, he told me "you're a hairy bugger I'll have to shave you right up young lady", and I didn't know he wasn't just talking about my legs. Standing with my legs wide apart while this man coaxed me through the entire ordeal of shaving, his hands made me feel so dirty. "Have I lost my mind?" I thought to myself but I had to play nice until I had an opportunity to get away, this was not as fun as the girls made it out to be after all, this was utterly disgusting. I had no idea what was going to happen next with this guy, and due to whatever pharmaceuticals he gave me, I still don't know to this day.

Waking up the next morning my head was pounding in an agonizing thumping pain and I was so thirsty. The satin sheets thankfully covered my body, which was still nude from the night before, and I could hear hushed voices standing over the bed where I was pretending to still be asleep. Listening in on their conversation I kept my eyes shut. I knew Ron's voice from two of the men but not recognizing the other guys I just stayed quiet hoping they'd soon leave. Ron was telling the other man what atrocities he got up to the night before with me and I heard him say, "Doesn't she even look like an angel the way she sleeps? She's my own little angel!" He exclaimed proudly. I opened my eyes and rolled over to face them both having to wrap the sheets over my body, really not knowing what to say except "Good-morning" in a blushful tone. Ron

introduced me to his business partner and told to go get dressed. He had my whole day planned out for me already. Booked into get my hair colored, a much lighter tint of blonde, and afterwards a day of shopping with the girls I was becoming exactly what he wanted me too, a carbon copy of the teenage Barbie... only I wasn't plastic and came with many benefits.

Days turned into weeks, being a servant to the sexual desires of this distorted pervert. I dreamt of escaping but where would I go and how would I get away from Ron with him controlling my every second of my day. Separating myself from the other girls being so uncomfortable with enduring the everyday occurrences I was longing for the solitude of the beach again. They were training me up to be an escort prodigy or something like it. Outrageous orgies were conducted as my lessons with the girls teaching me all of their tricks in the game, it was all for the sake of men's perverted fantasies, they didn't get anything from being sexually exploited and molesting each other, except getting paid for it. Everything from oral sex too penetration with toys, I was expected to not only to join in but even perform ludicrous acts of hedonism.

I was Thirteen years old and had never heard the terminology of these sexual acts before, and definitely shouldn't have been learning them first hand. Thrown into a world of chaos, I didn't know what to do except be as compliant as possible, even when asked to do the most degrading tasks. The excitement of the lifestyle he offered quickly diminished once I had to pay so dearly for it. The girls that subdued to this lifestyle and enjoyed it definitely put on a good act, but no little girl with hopes and dreams of their untainted future, turns to her mother and say's "one day I dream of being a prostitute, passed around from man to man, only to grow older regretting so much of my life" It was all a part of an illusion that Ron painted for us that made it seem so alluring in the first place.

Spending my days with Ron, he took advantage at every chance given. Even in his convertible with the top down I would be forced to go topless while he drove around, when I asked him why one day, it was supposedly so I could maintain an even suntan, but I knew it was his way of showing off his treasures. It was a far cry from the simple country life I had been raised in. Wearing designer miniskirts and tops that always revealed too much, of course due to Ron and the girls determining everything I wore, ate, or spoke. We would spend our days at hair laser clinics, shopping, tanning beds, and eating as little as possible. Through the nights we were expected to become party animals and greet Ron's clientele with the upmost flirtatious attention and doting as possible. Then whether we were out for dinner, at a party, or at a club, the men would choose his girl and take her home. Every girl had a different price and so did the charges depending on the various clienteles but Ron always kept me for himself.

I would always dread the end of every night, fearing what new desires he had in-store for the evening. Sometimes he would hurt me and tell me to try and enjoy it then do it over and over again until I gave him exactly what he wanted, I always resisted until I could no more, he was too overpowering and relentless at getting the results he wanted. At other times he could be so gentle and caress my skin, worshiping every inch of my body, all relying upon on what mood he was in. Often though he liked to play the teacher role and instruct me on every motion and explain what would happen when I did those certain things to him. No matter what he did to me I was only disgusted with myself more and more. I still shudder at the thought of how he used my body.

I turned fourteen in August that same year and was spending my birthday loaded on a concoction of pharmaceuticals and alcohol, being generously supplied by the very man who swore his devotion to caring for my every need. I didn't even know myself any longer, completely shying away from the girl I had grown up to be until to this point. The apartment was empty except for me, for the time being, and that was God's own little present for me...some solitude for once I thought. Pouring myself another drink I opened the sliding glass doors to the balcony and walked to the edge. Looking down from the many stories where Ron's apartment was, I wished myself a happy birthday out loud and wondered if my family even remembered the day's occurrence.

Dwelling in my sadness for the fourteen years of suffering and loneliness I had already endured, the tears swelled up in my eyes, trickling downwards making my eyeliner inevitably leak down my cheeks. Inside I felt so trapped and began to entertain the thought of jumping over the edge, it all seemed much easier, and the simple blackness that death had to offer rather than the tangled mess I was so tired of fighting to get out of seemed a much easier approach. Detached from wanting to feel anything, I became so numb towards my life's own tragedies. I couldn't live like this any longer. I lifted my bare legs over the edge of the railing and sat looking at the ground beneath me so close to even just slipping off the edge to my very death. I couldn't think of any reason not to fall. I thought I had made too many bad decisions to keep going on but some force of a higher nature had other things in store for me.

The sliding door slammed open with a burst of speed and Ron scooped me up in his big arms and brought me inside to our bedroom. Laying me down and seeing the look of despair in my eyes from my tear stained face he went into the bathroom cupboard and returned with three pink pills. Forcing me to swallow them using the angered tone of his voice he thought he was turning my sorrows into a distant dream as I passed out in

his tight clutches, crying myself all the way to sleep. He didn't even ask me what was wrong, probably because he knew already.

Soon enough the crumbling of his evil empire in the underworld of selling sex for his own advantage began with a single crack in his perfect scheme, and proudly it all started with me. Ron got a scare one-day and rampaged through his apartment telling us girls to only pack our important belongings and some clothes as we all had to leave right away. I didn't have much belonging to me so I basically sat there watching everyone rush around frantically and was curious what could've gotten a man like Ron so scarred. Once we were packed up and in the limo he was trying to calm the frantic girls down after all the panic that spread through the apartment like wildfire, I was the only one sitting there half amused at the entire situation.

He began by assuring us that everything was going to be fine. Calmly he continued to tell all of us packed in tightly, even for a limo, that we were all taking a long trip to Florida's countryside because someone has reported an anonymous tip to the missing persons unit at the local police station identifying a very young girl as a possible victim of abuse living at his apartment. Ron knew what a landmine of trouble he had brought upon himself making an exhibition out of me on the streets of Miami, I didn't pull off the older look like the other girls, I actually looked younger than my age with my blue eyes and freckles always giving the impression of my youthful innocence.

Now he just had to do whatever it took to ensure he stayed as far away from the authorities as possible. Arriving at a ranch in central Florida many hours later and I assumed it belonged to Ron knowing never to ask him things like that. I knew my purpose and it wasn't prying into his personal life outside of the bedroom. There was a main house, a few cottages, some staff quarters and paddocks where the horses were kept. I was in heaven...I thought at first. Finally, something I could really enjoy. Riding was my passion, basically growing up on the backs of horses since I was just able to walk.

Not surprisingly I began to despise Ron and all of the girls for the gross exploits they made me do with them. Beginning to isolate myself from everyone I'd rather spend my time sitting under a tree watching the horses graze, writing in my journal or painting but mostly avoiding everyone possible unless Ron required me elsewhere. Nighttime was always a reoccurring nightmare for me. Relieved over and over again in many various ways. Ron would always start by making me some drinks and offering an assortment of pills before indulging himself by grotesquely putting his genitals in my mouth and tell me how to give him what he would call a "first-class blow-job", and I was being judged every minute of it. Ordering me to slowdown or speedup or maintain a perfect

rhythm I was constantly being criticized for my efforts in pleasing him. I was eager when he actually gave me a compliment. The rest of the evening was always a surprise left up to a moments notice. Quite regularly he would proceed with having the girls dress me up in some sexy outfit and loads of makeup then entertain him with a lesbian reenactment revolving him in the center. Sometimes they would use dildos and other foreign sex toys, Ron liked to see us hurt during sex, sometimes even penetrating me anally but I always resisted and would try to redirect him with another sexual desire of his but I had no excuses when it came to me having to use the sex toys on him, he told me how men have g-spots in their rectum and instructed me on how to precisely penetrate him. These nights went on what seemed like an eternal sentence for the price of not living on the streets, where unfortunately for the one's still there, I feared and knew from my own personal experience, could be much worse.

Needing some contact with someone of my adolescent mentality I called one of my school friends from the past, whom I wont name out of privacy, but I'll call him T.J. We were so close and I knew very well, so well, I had memorized his number a long time before. He was my first puppy love sprung from of a childhood friendship. Being my very first crush the summer before all of this happened he was the only person I could think of that would care enough to talk to me.

In the middle of the day, the least busy time to be noticed, I snuck into one of the vacant guest rooms and used the phone to call my good friend. The sound of my voice radiated a chill in him. "It's you, oh my God Jenna! Are you okay?" he was so shocked to hear from me and the sheer fact I was still alive. Nearly three months now without a single word to my family or friends, every one doubted my return. My attempt to forge a happy voice when I spoke to him failed and I absolutely crumbled when he was at a loss for kind words for me. I told him of my current state of affairs. Telling him of Ron and how I was terrified of him, trying to escape in the middle of nowhere was useless. It was like being kept in cage that I was unable to break free from. Going on to dump my issues on T.J, I proceeded with how I longed to call my family and to be with my them for good but was too afraid they didn't want me, knowing I'd just be sent away somewhere else again and to me after all this time was like going from one cage to another.

He had been called by them numerously and promised me that they were very worried and even hired private investigators to try and find me. Given I was eleven years old the first time I was sent away, my trust in there sincerity he spoke about was seriously doubted. I kept the conversation short just in case my absence was being noticed and I left on the note that I would speak to him again shortly. His attempts to get off

the phone were nothing short of desperate plea to keep me on as long as possible. I thought he was just trying to help in some way. Giving him assurance in the fact I had survived this long obviously I can hold off a while longer I gave him my love and told him I'd be in touch.

Thinking I had slipped away unnoticed I entered into the room that I shared with Ron, hoping I got away with my brief and very needed phone call. The place looked empty and everyone else seemed to be out and about so I decided to have a bath in the spa and try to relax before the night's precautions. My body glided into the steamy water as I began to think about T.J and how good it felt just to hear from a friendly voice. My thoughts drifted into the days I missed when I felt I could be silly and childlike and I nearly forgot for a moment how grown up I was acting these days.

My first glimpse at the image surrounding me when I resurfaced above the water was daunting. There was Ron was standing over my tub, looking down at me with an eager display of his arousal. He began to undo his pants and take them down when he told me "put your lips on my cock", I was too slow in responding to his request so he grabbed me by the back of the head and forced me into his groin. I had tears streaming down my face as I looked up to him with the saddest blue eyes hoping he would take pity and stop, but he never did. I was really hurt by his aggression and he definitely knew it this time, which I believe only made him more heated. I closed my eyes and began to count using the time to keep my thoughts elsewhere believing every number I counted only furthered me to the end of this. I just got over a hundred when he finally exploded in fulfillment still half submerged in the deep bath I was struggling to gain my bearings in as Ron was picked me up out of the bath and carried me to go to the bedroom, which was just outside the French adjoin doors. Still damp from the hot water in the spa I had goose bumps from the chill of the fresh air where he brought me to the bed and proceeded to deeply violate my every being. Eventually his scars that he left were too deep ever to be healed and would even carry on through the years to come.

Upon his bursting with pleasure for the second time, he just got up and left, without even saying a word to me. Left alone I was awake for hours after that. There was no escaping the pain that night. I lay naked wrapped in the sheets, sobbing in the dark. My feelings of being hurt and disgusted after his abusive ordeal "When will it ever stop" I prayed to God and begged for death rather than face another day in my life. I woke up still alone the next day and exasperated from the misery I felt the night before. Ushering through my drawers to find something to throw on I could care less what lay in store for me today, couldn't be as bad as being raped by a scary man repeatedly.

Starting my day with a few of the supplied oxytocin's and a bloody mary, made by the live-in house chef. Having two celery sticks for my breakfast, I wanted to lye out by the pool and forget the world. Ron hated tan-lines so to be caught with a bikini top on was a big no-no in his rule book but after my cries to stop were so blatantly ignored last night, I was out to piss him off so I didn't remove my shirt. I put on my headphones and before I knew it had fallen into a deep slumber from my self-made therapeutic cocktail, the only way I knew how to cope with the emotional turmoil on the inside.

Desperate to hear his voice I called my friend T.J a few more times that week. I needed to feel like someone out there really knew me. Sometimes we could just chat like old friends with no care in the world and laugh at a distant memory from too long ago. Then would come the good-bye part of the conversation and we would both get teary-eyed not knowing what could happen next or if this would even be the last time we ever spoke to each other again.

My biggest fear came to reality when I was in our bedroom one afternoon, just lounging around out of boredom. Ron came bursting in through the door, red as a tomato. I couldn't help but feeling I was in big trouble. His face was distorted and raging towards me. I knew right away he must have found out that I was calling T.J, but how, I had no idea. I had always tried to be as invisible as possible, soon enough it was all explained.

"Are you trying to get me caught? You are nothing but a stupid girl you know that! What am I supposed to do with you now?" He was tearing up the room while his rants gave me something else to think about. What would he do with me if he had no use for me any longer? I wasn't even thinking about him being caught for soliciting illegal immigrants for the purpose of prostitution. I was more worried that he would be upset at the fact I was talking to another guy, maybe even jealous that he was at least my age. I replied with simple sentences that I could manage to get out between all the shouting. I kept saying, "I'm sorry" and putting my head down in shame. He picked me up by my throat pinning me against the wall, "You are going away, far -far away from me and you better be nicer to the next man I send you to, I've heard he's not a nice as most would like. Are you fucking hearing me Bitch?" I slid down the wall, choking on the first air entering my lungs, breathless and terrified, I never thought Ron was a nice guy but I had never seen him lose it this bad. Now I was being sent me away to another stranger, another man, it only terrified me more.

The girls came in to say their good-byes all of them were crying and asking me in their best English languages, why I had to call someone and lose everything? I was able to find out through the broken sobs off of

them that the confession came from the house-keeper who said she saw me use the room regularly but was never messed up, so Ron looked at the recent telephone bills and found the same number dialed from that room consecutively, he knew it was me right away. At least he didn't know it was another guy, I thought to myself, or I probably wouldn't have made it out of there alive.

Ron came back to usher the girls out of my room and told me I had five minutes to pack my clothes, which he made clear were to be my only belongings to take with me. He washed his hands clean of me that night, or so he thought. The driver came knocking at my door, just as Ron said, no longer than the five minutes that he had offered me and he took my single bag to the car. I didn't want all the jewelry, music or books that he so caringly bought me as tokens of his twisted affection. Only taking my clothes and a wad of hundred dollar bills I had been saving, I slit a hole in my scrunchie inserting my cash for a rainy day that I was more than sure was just around the corner. .

We drove for hours, until I started seeing familiar surroundings. I couldn't believe my own eyes. I was back in Miami, but not on the beaches, somewhere in the CBD this time. The Driver delivered me to the front door with my one bag and waited at the door with me. Now I knew how it felt to be a puppy picked from her litter as you can only hope your next owner would treat you with some sort of kindness.

Another balding man answered the door but he wasn't so grotesquely fat like Ron, but still a new owner at that. He looked me up and down and seemed amused as he snickered to himself. With one last look to the driver over my shoulder it was almost an appeal to him for some way to help me. I knew he couldn't anyways, I was just hoping. He told me his name was Charlie but didn't even bother in asking me for mine. I was sure Ron already filled in all of my details when he arranged this.

Charlie picked up my bag and led me into his bachelor pad townhouse. I was never given a welcoming tour of my new residence or made to feel comfortable. He walked me up the stairs and opened one of the doors in the small hallway. Telling me this would be my room, he showed me into it and told me to wait, he would be back shortly. I sat on my bed afraid to touch anything and after the warning Ron gave me I knew I had to watch my step around here. I put my head down onto the pillows my where world was falling apart and let my emotions downpour. Exhausted from the days emotional turmoil I ended up falling asleep. I don't even know if he ever came in at all that night.

The next morning I looked out of the window to see my new surroundings. It was a beautiful sunny day outside, unlike the dreary cell I was locked away inside of. Feeling the sun warm up my face through the glass, it radiated a familiar sense of comfort from the days of the good

parts of my childhood. I reminisced how it had used to be before all my life turned upside down. Before all of the fights with my family, before I had to look after myself, and before I was a slave to men.

Those days were too long gone now. With too many hard times passing me by it seemed surreal to think that life had ever even existed in the first place. With that thought I shook myself out of reminiscing that way. Whatever was going to happen was out of my control now, I just had to give myself some hope that I would have the strength to get myself out these circumstances before anything really bad happened.

Chapter 2

The house was quiet so I just assumed Charlie was still asleep. I decided to get cleaned up and have a shower. Not even a knock on the door when Charlie walked in with ease. "Typical" I thought. It was an easy way for Charlie to break the ice. "You really are as beautiful as Ron said" as he opened the curtain. Watching me rinse myself in the shower and me knowing I had no way out of this except to go along with whatever he wanted. I just looked down at the mention of Ron's name, wondering what else he had told Charlie about me. Realizing later that he wouldn't have said anything anyways, in fear I would've been a damaged product that wouldn't make him the money that young girls go for.

He just sat on the side of the vanity top and continued to take observations of me standing submerged under the falling water. I avoided looking at him and let him do all the talking, after all I knew what I had to say was of no importance, that is if he was anything like Ron. Between the water beating down over my head I could slightly hear him ramble on about some club and restaurant he owned in FT. Lauderdale. He said he was going to take me shopping for some club outfits and we would party together tonight, as if I was supposed to be excited over this so-called treat of his.

I looked up and gave him a quick smile adding a compliant nod and turned my attention to turning off the faucets and quickly grabbing my towel. I was falling so far from who I used to be, shying away from my outgoing personality to a quiet girl that didn't even recognize herself in the mirror anymore. I dried myself off and looked at the man standing between the doorway and me. He was still watching me with a sleazy look on his face but now preceded to move in my direction, arms wide open. He embraced me, running his hands up around my youthful curves, licking my neck and earlobes. Then his large, rough hands cupped my small breasts and continued downwards to feel in between my legs. I

knew what I had to do to get this over and done with as quick as possible, but I was dreading this moment from the second he greeted me at the door last night.

I fell to my knees and gave into his demented perversions. Thankfully it didn't last long before he climaxed and I was allowed to get myself dressed and ready to go out. I was nothing but money well spent in his mind. This was another extremely wealthy man with a completely new set of wants and needs asking a fourteen year old girl to affectionately dote on sexual desires to a man in his mid forties. I really hated myself, these men, and just about everything my life had boiled up to by this point, but I knew from a young age that to survive in this harsh world I would have to do many things I would not willingly choose to.

At the shops he decided he would choose the clothes he paid for, which I might as well have been declared a teenage prostitute. Just like Ron he also liked it that way. The more degrading he was to me only proved his ownership of my body. He bought me tiny cocktail dresses, and skimpy outfits, which I thought closely, resembled the lingerie he'd also bought for me to wear for him. I noticed that day that he enjoyed parading me around the shopping mall and out for lunch at hooters, even joking with the waitress that he'd like to buy her uniform because he thought it'd look sexy on his new girlfriend.

We arrived at his two in one, Restaurant and Club, at around nine o'clock in the evening. It was a revolving tower called "Hot Chocolates" in downtown Ft. Lauderdale. The food was delicious and for the first time since being with Ron, I ordered a hefty meal with steak and mashed potatoes with a scrumptious gravy smothered on top. Charlie ordered strong cocktails for us both and before I knew it my head was spinning and we were on the dance floor together. The music blared in my head and the rhythm of my body took over, completely forgetting about even dancing with Charlie and letting the music take ahold and work it's magic.

It didn't do me any justice though as Charlie watched me imagining what pleasures lay in store for him later on. Taking me home before the club had even closed, he just couldn't wait to indulge on exactly what he was fantasizing from beforehand. Once back at his townhouse he led me up the stairs into his bedroom and pushed me down in the middle of his bed. The motions from the wavy mattress made me dizzy and feel even drunker when he lay on top of me. Coming at me like a hungered beast wanting to ravage his next meal, it was intimidating as he entered into me with a forceful thrust, he moaned out in delectable heaves. I looked away while he self indulged his own gratifying needs using my body as his instrument in pleasure. I only grew stronger in my head letting the hatred for men desires intensify.

The next two weeks I was expected to be at Charlie's beckon call, never aloud to leave his side, even making me sleep in his bed from the second night onwards. I never even got the chance to call T.J. again. It was too much of a risk anyways. Thus pushing him further out of my memory, too afraid, of the emotional repercussions.

Our typical routine was to wake up get showered and dressed and I would put on my make-up while Charlie made his business calls for the day. We would leave the house mid-afternoon and run his errands do some shopping, sometimes meeting his friends or business partners for lunch, none of the men he introduced me to seemed offended at his choice of adolescent eye candy. They'd just continue to chat away as if it was normal to be in public with his arms draped over a girl young enough to be his granddaughter, not too shy by giving me a flirty tap on my bottom or even try to kiss me.

My last night was no different from every other night. We went shopping that day and out for lunch alone. Later we headed to a club his friend just launched and it was his grand opening that night. The club was called "Iguana Joe's". We met up with his friend and said our hellos. They both seemed so excited about the club and Charlie was full of compliments all around. The club did have a line out the door which looked a mile long coming in, luckily we didn't have to use the front door. Charlie returned from the bar with two giant long-island iced teas, which were his favorite drink to start with and then we just sat for a while watching people dancing. Occasionally conversing about passing thoughts. We danced for a while having a few more drinks and after about two hours, Charlie said he was ready to go home. What a daunting time to look forward to, he always liked to have a brief sexual encounter before drifting off to sleep with my naked body intertwined between his arms and legs.

It was bad enough to have to entertain him at every given second of the day but his grip on me was so stifling I felt so choked I could hardly breathe much less sleep. Eventually my over-worked mind would drift in-and-out of a restless sleep, but constantly on edge. I thought many of nights of escaping, but where would I go? Would one of Ron's ever-so-connected informants find me and turn me into him to be disposed of for good? I just prayed that I wouldn't be another missing person to add to the list of girls found in the local ditches. I knew that's where I was headed if I screwed this up for Ron again.

As if my guardian angel was there the whole time listening to my secret prayers, my rescue came the next morning with an abrupt bursting through the bedroom door at about six am. Charlie and I were still lying in bed together and his grip on me was still tight. The men dressed in all black military gear had large guns and helmets on. It was so frightening

at first. I couldn't even comprehend what was happening so rapidly. I thought Charlie could've been in some kind of trouble with a business friend he had done wrong too, but then one of the men in black shouted "F.B.I this is a raid get down with your hands on your head", in too much shock to move three of the men grabbed Charlie and threw him to the floor and cuffed him. I sat up in bed with my sheets covering my naked body and watched as they dragged Charlie from the room. Still completely nude he wasn't even aloud to get dressed. Another agent had to come back in to the room to find him a pair of shorts. I could hear him screaming at the top of his lungs all of the way outside He was screaming and the last thing I heard him yell was "If you say anything you know who will find you!" I could hear more threats being yelled at me but I couldn't make out what it was that he was saying. I was in total confusion and couldn't believe what was happening. There were so many uniformed agents I felt so small compared to all of them but they were all very kind and helped me out of bed allowing me to remain covered up with the bed sheets so I could get dressed. The first decency I had been showed in a long time. It was an odd feeling to acknowledge. I knew the life I had come accustomed to for the last six months was now over, and in so many ways I was relieved but was also very nervous about what lay ahead of me.

I excused myself to the bathroom to put some clothes on. Not having anything half decent, like a normal pair of jeans and a t-shirt. The best I could come up with was a metallic blue miniskirt and a tiny matching top that fell just below my breasts, hardly clothing at all it was more like scraps of cloth. Putting my hair up in a tight bun with the scrunchie that held my five hundred dollar bills I was led out of Charlie's townhouse for the very last time. Starting my life over... again, I wanted to leave behind my every memory belonging to these horrid times. Only taking small sack containing my underwear, makeup bag, and journal with me.

The agents led me down the staircase and my last vision's of Charlie was bent over the hood of a police vehicle still screaming and handcuffed. I slipped into the backseat of the car and was driven to Broward County Police Station where the Federal Agents interviewed me about my entire whereabouts for the last six months. I was so scared of what Ron would do if I told the agents what really happened but at the same token I knew he'd most likely kill me anyways for being such a liability.

Over the next few hours I sat down and told the agents how Ron's business worked and what I part I had to play to him. I was able to ask how they found out I was at Charlie's house and they informed me that I was being followed all the way from Ocala, Florida where Ron had me stowed away for the last four months. T.J., my friend, called my parents

after our first phone conversation and ever since then, the F.B.I were tapping the phone lines and recording every conversation. Completely unaware of T.J.'s caring act of deceit, I was in such shock that they had been tracking us for so long. I knew now, with or without my help, the F.B.I had enough on Ron to put him away for a very long time, if they could catch him, that is.

Having so many crooked people working for you can be an advantage when you're in trouble. Like having a pair of eyes in every city. Ron was somehow able to find out about Charlie's arrest and immediately deserted the country to avoid legal punishment, not to mention the discretization of his esteemed clientele that the feds were now on to. Ron had so many countless charges put up against him, eventually when the F.B.I were able to track him down they were able to have him arrested in Yugoslavia and extradited back to Miami, he was finally held accountable for being a pedophile, soliciting women for prostitution, and running many illegitimate and illegal businesses. By the time the F.B.I caught him he was in his mid-seventies when he died of old age serving his second year prison for a lengthy sentence. Coincidentally I was told of his punishment and death many years later by one of the same F.B.I agents that had rescued me from Charlie's arms.

I was taken out of the interrogation room after the interview was over with and told to sit at one of the officer's desk while I was waiting for someone to pick me up. Uncertain of who that someone would be I assumed it would be someone from the juvenile delinquents division to take me back to some state operated lockdown facility. Not the nicest of places to call home, but I had no choice in this matter.

Sitting back in the revolving chair I was twirling out of boredom and listening to the roaming conversations within the office. I pondered in fearful anticipation of the dreadful places that lay in store for me. Having to of spent a lot of my adolescence in these kind of places for the sheer factor that my mother said "I was out of control and unable to handle" by eleven years old. There was plenty of just reason for me to be so scared of those places. What I knew lay in store for me were constant fights between the rough girls being settled with violent raids then out came the pepper spray and then the strip-searches and worst of all, no sunlight. It didn't matter if you were a quiet, shy girl that didn't belong there, when there was a fight, which was could be like a few times a week, every person in the room was considered a threat and were treated like a violent criminal. I hated those places and the memories they gave me. That's why I always ended up back on the streets. No child or even a juvenile should have to be subjected to such unreasonable force and neglect. Some of the girls were so used to being subdued to this kind of treatment their

whole life they ended up repeating the same attributes as the people who initially hurt them in the first place.

One very sad girl I'll never forget her, had a father who had been a heroine junkie and decided to play Russian Roulette with some of his addict friends and by fate or chance took the bullet straight through his brain, killing him instantly. Her mother being a heroine addict herself spiraled downwards after his death and gave her four year old child to her ageing grandmother that eventually had to put my twelve year old friend in this un-dire circumstance. I can only have the highest hopes for her today but unfortunately for most girls that have been victimized by society aren't able to ever stop being a victim for the rest of their lives or go on to make other people victims themselves. A sad and unfortunate fate for so many innocent, and it happens so much more than anyone would rather admit too instead of just trying to find a solution.

Chapter 3

Hours later I was still twirling myself in the same office chair when I spun around to see my Father walking in my direction. I nearly fell off my seat at the sight of him. Gripping the chairs handles I couldn't imagine what in the world I would say to the man I once used to call Daddy but now hated for the abandonment and unforgiving wounds he instilled inside of me. He contemplated putting his arms out to hold me but instead anger and shame took over and he just shook his head. I never saw my Dad cry until that day and I have to say it made me feel young again and sad I had disappointed my parents again. The agents now standing beside us led both of us together back into the interrogation room to re-tale my journey to my father who they said I had no choice to tell, or they would have to tell him for me, being I was an under-aged minor and Ron violated the statutory rape law, among many others, when he took me back to his apartment and kept me as his sex slave. My Dad couldn't believe what he was hearing and for his lack of better choice in words asked me to stop talking, he was just happy to know I was alive. Like everyone I'd known in life they would rather brush it under the carpet and not deal with the pain rather than realizing sooner or later it all comes out sometime in our life even if it transgresses into our future then becomes what we are willing to accept out of partners, work, and people in general. Simply saying in other ways than with words that our bad decisions befall our tragedies later on in life.

The next discussion was led to where I would go to from here. Before anyone could put his or her suggestion forward I leapt in with my two bits and made it obviously clear to my Dad that if I was sent away to

another lockdown facility and if he betrayed my trust, again, he would never see me again. I would disappear for good this time and for all he would know I could be dead in no time on the streets. He looked at me and for the first time in my life he saw the many years I had grown up in the time I was gone and heard the seriousness in the tone of my voice when I made my vow to him. He put his head in his hands and told me the bad news, my Mom didn't want me to come home and she was making his life hell for even suggesting bringing me back into their lives. I for some reason threatened her lifestyle and drove her crazy. I had been surprised about a lot of things lately but not that one. The last time I saw my Mom she ever so carefully lied to me and told me she was bringing me to an eye-doctor for an infection. Instead we walked into this tall blue building with people in uniforms holding clipboards and a few muscly guards, she ushered me inside and hurried up to close the large auto lock doors behind her leaving me there alone and imprisoned, which is what led me to recently living on the streets. My life was hell as long as she was in control of it, so when she didn't want me back at home I was fine with that too, but there had to be somewhere else I could go. My dad said he had no choice but to put me back into the facility, but he made a sincere promise that he would not take any longer than a week to try to find a place for me to stay and to go to school. A week I could deal with, but I was still unsure if I could trust my father and hold him to his word, but yet again, I had no choice. Being my legal guardian he could send me anywhere he wanted and there would be nothing I could do, except for keep running. I gave in, and before he left the officers to take me back to the last facility I had run from, I gave him one last hug and reminded him "one-week and I'm gone". Nodding his head and squeezing his arms tighter around me, I could only hope he meant it, but he didn't look too optimistic.

In the police car on the way back to the facility they had to handcuff me in case I ran again, but I had no intentions to anyways. I was going to give my dad the week before I began to search for the right opportunity to jolt again. I was like a "ghost come back," said so many of my girlfriends from the past and there was now a lot of new faces there too. At night when we were all in bed and supposed to be sleeping, I would be daydreaming of better days and imagine myself somewhere in a comfortable bed, actually enjoying my life for a change. A week went by in this facility spending most of my days locked up in what they called "The White Room", a bare room with concrete flooring, no toilet or even a chair to sit on. The only comfort I had was the blue sweater that was provided as part of the uniform, and my hair scrunchie filled with my stowed away cash that no one had found during my unpleasant strip-searches. I would spend hours in the white room for objecting to their

conformity and unwilling to participate in their drilling regime. I didn't feel like I owed any explanation to these people even when they brought a physiologist in to speak with me, "What was the point when I would be gone any day now" and as if any of these people even cared in the first place, I was just another number in the system and they had a job to do.

There was one mega-bitch, female guard, named Evelyn and she used to either really like you or really hate you and God-forbid you were one of the unfortunates that she didn't like, she'd make your entire stay their an agonizing nightmare. Constantly picking on girls who were not strong enough to cope with their predicament or past issues, she'd stand them up and publicly humiliate them, and even when they begged her through their sobs to let them sit down, she'd only torment them worse. Which only made the strong girls want to antagonize the fragile one's with more malicious intent. Luckily when I had previously been there she didn't take much notice of me, but I stayed out of harms way with her, just being quiet and observant.

Being back here seemed like an eternity while I held my end of the bargain but unfortunately my Father didn't. The first chance I saw to run I took it. I was being sent to go get my blood and urine taken for drug and disease analysis. My driver would be a volunteer from the community and it was the perfect getaway for me. I was brought from the white solitaire room and led into the bright sun, feeling like today would be favorable in my escape. We got to the doctors office, my whereabouts told me I had plenty of ways to run and I scouted out the best looking route. My plan was to barge through the volunteer's inexperienced grip and wriggle my way out if needed, then hit the asphalt, running until my legs couldn't carry me any further. Playing it out in my mind felt different to the anticipation that led up to actually doing it. The inner-strength I had was the only thing going to help me in this circumstance.

We arrived in the parking lot and I hadn't said a word to him the entire drive, the small framed Spanish man tried to make pleasant conversation but I couldn't see him as anything but a challenge, so I kept quiet instead, ignoring his humorous attempts to befriend me. The car pulled to a stop and he came around the side to unlock my door, this was it, "here we go" I told myself, and pushed past the volunteer. His arms grabbed out at me but only caught me by my shirt, he didn't even put up much of a struggle, like some of the other trained one's I had gotten before, they would put me into body locks of all sorts but he just tore at the collar of my shirt letting me break free. I had done this many times before so I knew I wasn't gone yet, I had to first get out of these clothes. The cops would be looking for someone of my description in the area with a blue shirt and khaki pants, so my first stop was a busy shopping complex. I took the money from my scrunchie and bought myself a pair of jeans, a shirt, and

a sweater for disguise and my next stop was Dunkin Doughnuts' to get a chocolate iced doughnut and a cup of coffee. I didn't have doubts about getting out of the facility but I wasn't expecting it to be so easy this time. My past excursions all began with an abrupt struggle sometimes ending in a brutal state of affairs after being pepper sprayed and fastened into some painful lock by forceful men four- times my size, then tossed into solitary until I saw my next chance to desert. I got to know the guards real well, as I spent a lot of my time being dragged down to the white room by them. There was Jim, a large black man who could've doubled for a "Miami Dolphin's" defensive linebacker. John was another big man with a ponytail and a mustache, and he looked like someone who definitely owned a Harley. The last guy Scott had a smaller build but made up for it with his steroid injected muscles bulging out of his neck and their was the added height from his curly fro. When they weren't restraining me and holding me captive in solitaire, they were actually pretty nice guys, not afraid to have a laugh after some explosive incident and I held no contempt towards them either, they were just doing their jobs.

It was de'ja'vous all over again, free at last but where would I go now. With Ron's scouts on the lookout for me, and now the authorities being notified I was a runaway again, I would have a lot of people searching for me, so I knew I had to be careful where I went. My last stop before leaving the shopping center was to use a payphone to call my parents, my Dad answered completely surprised to hear me on the other end, I wanted to sarcastically thank him for breaking his promise to me and I hope he is happy now, he just lost his daughter for good. I stopped to listen to what he was trying to say and he told me "I was getting you out in a few days, I found you somebody to stay with, she's a good person who has got teenagers your age, I was just trying to convince your Mother to sign the papers to get you out of there".

I was so outraged at her ability to put her own wants before the needs of her own flesh and blood daughter. I told him to come pick me up and bring me to the house so I could speak with her for the first time in over a year, but if I felt threatened for one second I will be on my way quicker than a blink of an eye and on my own for good. He wasn't overjoyed at my proposition, knowing what position this put him in as her husband but as my father he decided to put me first for once and take me home to confront my mother.

I arrived at my house for the first time in a long time and everything looked different. My parents refurnished and renovated the house. I didn't even have a room anymore, my old belongings and bed were removed and it was now the office. Of course my Mom didn't meet me at the gate or the front door like her long lost offspring reunited. No, instead she

waited for me to come find her outback smoking cigarettes and having a beer. She stood up from her seat and squinted her eyes loathing in her hatred she coldly slapped me hard in the face. The slap stung, but I matched her look with a familiar stone-coldness that only she could understand. Immediately we both started to cry and we washed away our anguish and resentment through our tears and consolidated our feelings for the first time since the chaos first affected our lives. She didn't want to know much of my whereabouts and she still had a lot of anger to get over but she asked me to stay home at least. My little brother ran through the back door and hugged me so tight, I started to cry again and was saddened by how much time I had missed the time I had lost just hanging out with my brothers and it took me even longer to realize how precious time really is. We were never going to be the average Joes next door but at least this was better than nothing. I loved being with my family again. We had BBQ's and bon-fires with each other and life began to slowly piece back together. It was bizarre how normal it was when I first got home. I turned fifteen that year and it was the exact cup of tea that I had needed to boost me up and get me on the right track.

I decided to go school to acquire my general education diploma or G.E.D and got a summer job with my Dad at Mar-A-Lago, Donald Trumps exclusive country club in Palm Beach. Surrounded by lush acres of tropical landscapes, manicured gardens, and a mansion made into a beach club for the rich and famous it is known as the "Jewel of Palm Beach". I was in sheer awe at the gold arched ceilings and the grandeur ballrooms.

The spa where I worked was world class, not only oozing in style but in the way each and every clientele was treated with the upmost service. My focus was now set on becoming a massage therapist, and working my way into a luxurious spa like the one I worked for now, only I was a locker-room attendant there. I studied many books about the anatomy of the human body and how you can affect a person's well-being and health for the better through a simple healing touch. It was amazing to me the way the body responded to massage. I was more than just interested. I was determined to become a therapist.

It was one of those anatomy books that I had my nose buried in one afternoon on a quiet Tuesday and it could get pretty lonely in the locker room, so if I weren't busy I'd sit outside by the spa's reception and read my books in the warmth of the Florida sun. A lovely looking woman in her late thirties who spoke with a proper English accent approached me. I assumed it was a general question, "like where's the ladies room or was that the famous model from so-and-so?" but she was more interested in the book I was reading. Only believing at first we were just making small talk she was really intrigued at my choice of reading. She then asked if I

did massage on the side, I stated I was only reading the book and had not yet began to study but one day I would love to practice massage therapy.

She introduced herself as Ghislane Maxwell. I would later find out that she was the daughter of the late prominent businessman and disgraced newspaper tycoon, Robert Maxwell. I told her my name is Jenna pointing to my nametag on my shirt and offered her a cold or hot beverage, as those were my instructed duties at work. She accepted a tea and went on to chat a bit about this rich guy that she worked for and she knew off-hand that he was looking for a massage therapist. Just doing me a good deed out of her kindness of her heart, I'm sure, she offered to introduce me to him. I declined her first proposition, thinking out loud, told her I didn't know the body well enough to even attempt an interview. She didn't seem worried at all by my fear of incompetence saying that if he liked me enough he would get me the best training in the industry. Ghislane thought I had a cheery persona and fit the quota for what he was looking for and as she put it an enthusiastic learner that she said she gathered from the sticky notes popping out of the various sections in my book. I accepted her phone number and the house address and told her I will call her if I am able to come over after work. I rushed over to the tennis courts where my dad was working and told him of the news. We both thought this could be a wonderful opportunity to get my accreditation in massage therapy. Seeing that it was a lady in her late thirties who came off as more of a nurturer rather than a procurer, neither of us saw any reason to be hesitant.

Chapter 4

At around Five p.m. my dad drove me down to the bottom of "El Brillo Way." on the Palm Beach intercostal. We pulled into a short driveway beckoning a large pink mansion with heavy wooden doors. I was so excited about this chance and asked my dad to wish me luck. He gave me a big squeeze and wished me the best. He walked me to the front door and I rung the door chime. Moments later we were greeted by an older gentleman dressed in a casual butler uniform. I told him I was here to meet Ms. Maxwell for a massage trial and he opened the doors for my father and I telling us to wait in the entry as Ms. Maxwell would be on her way any second, and she was. Down the stairs she walked with a warm smile, her short black hair seeming very proper and elegant, for now. She shook my fathers hand and thanked him for bringing me and kissed us both on the cheeks. They spoke briefly about whom she worked for and about Mar-a-Lago where we worked. She was in hurry, you could tell to end the conversation and say good-bye to my dad, which she did so

ever pleasantly. She said the boss was upstairs and waiting my arrival, so with that I said bye to my dad and began to follow Ghislane up the stairs. I was so nervous, but I didn't show it. I kept my reserve and demeanor cool as ice, trying show maturity for the open position. We continued on to the massage room, passing by a grand crystal chandelier, and a couple lengthy wooden hall tables displaying a multitude of photos displaying young girls and beautiful women, trying not to gawk at them I didn't even notice that some of those girls were only wearing their smile.

Ghislane asked me how my day at work was and I told her it was easy peasy as always just trying to make simple conversation. There was a fork at the end of the staircase and she led me to the right hand side. The lights were dimmed in the bedroom but I could still see the King Size bed in the middle of room, we did a U-turn around the bed, which led us into a massage room. Dripping in luxury I could've definitely compared it to the renowned Mar-a-Lago's spa's, it had marble walls and a glass enclosed shower and self-automated steam room at the very end of the Burberry carpeted room. There was a large mirror over a basin to the right of the room with an array of oils, ointments, soaps, and lotions and a small closed door, which I assumed must be a closet. The only thing that struck awkward about this room was the naked man laying face down atop of the turquoise massage table in the center of it. "I had to be prepared for this," I told myself. Massage was something I had never done before so I quickly brushed away my thoughts of possible schemes, wanting to believe whole-hearted this was going to be legit. Ghislane introduced us to each other and I proceeded to make his acquaintance.

Looking up at from his downwards position, he looked me over and gave a smile to Ghislane, an obvious notion of his approval. He was Jeffrey Epstein as she pronounced for him, as if I supposed to recognize his name or something. He affirmed, "It was his pleasure" and replied to just call him Jeffrey, "No need for formalities" he answered, cleverly putting me at ease. This man did not look like someone to beware of. Both him and Ghislane appeared to be very nice people and conscious of their health as their need for massages and spa visits, no alarm bells went off, yet. I was prepped by Ghislane to "treat this as a lesson from her and follow her exact lead, if I did good tonight then maybe I would become Jeffrey's Travelling Masseur, seeing the world and getting paid well for it". I was very hopeful, a job like this could really make my dreams come true.

I followed suit and washed my hands with warm water so the coldness would not shock Jeffrey's naked body, then lathered them in rich body butter. Ghislane told me to always keep one hand on Jeffrey, even when getting more lotion, so it didn't make him lose concentration on being relaxed. She gave me a tip and told me to keep a blob of lotion high up on

my forearm so it prevented me from having to keep going back for more and was less disruptive to Jeffrey. This all seemed for real to begin with, I was being educated about the body and splitting Jeffrey's body with Ghislane, mimicking her every motion. Starting with his feet, we began with his heels and arches of his soles. Pushing the blood up his calves in upward strokes to rejuvenate the body's blood supply and being careful to mind his leg hair didn't pull. I was keeping up with her and enjoying the education. It was so interesting how the body worked and I couldn't believe I was learning all of this for free. Once I got a bit of a groove following Ghislane, they began asking me all sorts of questions about my past and it didn't take long before the conversation led down the darker experiences of my young life. When they found out that I hadn't led much of a normal existence they only probed me with more questions, which being put on the spot answered honestly. The funny thing was they didn't seem appalled at all by my statements, rather entertained if anything. Jeffrey called me a "naughty-girl" with that wry smile of his, and half playful and half defensive, I answered "no I'm not, I'm really a good girl, just always in the wrong places" he then replied, "It's O.K, I like naughty girls" and rolled over onto his front side to expose his complete nude self. He wasn't the first man to show me his penis, so I wasn't shocked at the appearance of his manhood but I was incredibly shocked at his complete ease to present himself with an erection. I tried to ignore it waiting to follow the next directions off of Ghislane, who surprisingly now stood behind me bare breasted. Before I had a chance to even think of replying hastily she began to slowly undress me, while Jeffrey started to stroke his manhood while watching us. She unbuttoned my blouse and removed my bra, revealing my bosoms. Cupping them in her hands she moved her lips across my nipples, licking and teasing them with her tongue making them cold and stiff. Next her hands moved down to my little white skirt, removing the final piece of my remaining uniform. She slid my skirt down my legs with ease, for a moment keeping on my love-heart panties, so they could both take notice of my apparent youth. They even snickered to each other about "How cute she still wears little girl pantie's" Jeffrey said, and Ghislane joined in his laughter.

Acting as my madam, she instructed me to start by licking his nipples and after I had sufficiently pleased both of them, then prompted me to go down on Jeffrey orally while she rubbed her breasts along his body tantalizingly. She moved behind me again this time to remove my panties and start fondling the delicate folds between my legs. I was still in shock from the initial degrading blow. I hadn't even let the reality sink in, it was all too much for me to emotionally handle so instead I hid behind my fears, which I told myself "I wasn't going to ever be worth anything at all and this would probably be as good as it gets for me" after all I thought,

"what have I been trained up for until now". Nobody ever stopped to ask if I was comfortable or if I wanted to stop, no, instead, Ghislane only directed me to conclude the massage session by climbing up on the table to be fixated on Jeffrey, straddling him so he could penetrate me.

When it was all done and over with, I was taken into the steam room with just Jeffrey to get further acquainted, as Ghislane left the room to go get dressed. He asked me to grab his feet and rub them not saying a word about what just happened, like it was all normal and accepted. I listened to him ramble on about the health benefits of a sauna and the history of it, ignoring the fact of the matter of his pretentiousness degrading my spirit. I figured I had gone too far already, what would be the point in throwing in the towel now after I had done exactly what these people wanted.

Whilst we were sweating out our bodies' toxins, and the steam was blasting my burning face I listened to his lessons, entertaining his ego, I let him become my teacher, he seemed to like that. He sounded like a very clever and intelligent man though. Telling me his story of how he made himself an empire of billions from being a middle-class professor to an elite financial advisor for clientele with only billions in their bank accounts and through his so-called "lessons", He became my mentor and I emerged as his pupil, the teacher's pet.

After the sauna we went to the next glass door beside us where the shower was. He turned tap outwards and stood underneath the water as I stood naked and cold from the temperature difference. Instead of asking me to join him under the warm stream, like I thought he was going to, he handed me a bar of soap and asked me to wash his body from top to toe. It didn't stop there I had to massage the shampoo and conditioner into his scalp as well. I was bewildered someone would ask this off of someone else, wasn't it belittling enough having to endure the illicit massage from beforehand but now this. The surprises kept coming that night, as this was definitely not how I expected my interview to turn out, but that's what I had learned in my short time on this earth, life was full of disappointment.

I let everyone else take the power of authority from myself and use me in whatever way he or she wanted instead of standing up and giving myself the respect I deserved, which in turn would've helped me get through life without all of the abuse I ended up coping. Not given the belief in myself from an early age on I suppose is what affected my sense of control. Always letting the one's with power and strength reduce my inner-self to shreds until I was cut so tiny in size I would be completely subdued to only their wants and needs left ignoring mine. The men I had encountered in my short experience with them only repeated their inflictions convincing me there was no running away from the sick world I lived in, not yet understanding it all came down to the choices I had

made for myself, I needed some encouragement and the right words to unlock my very soul.

Jeffrey told me the towels were on the heated rack just outside the shower and asked me to get one and pat him down. Again putting himself first as I sat there freezing while I compliantly patted down his body with the white fluffy towel until he was dried. I nearly expected him to ask me to dress him as well, but not surprisingly that came later down the track too. I dried myself off and wiped the make-up from under my eye's, keeping quiet not sure what to really say and half-embarrassed from the entire evening's events that just took place. I just remained silent whilst we both got dressed until he brought me downstairs where Ghislane was sitting at a desk holding his black leather duffel bag. When she moved from the chair to let Jeffrey sit down, she passed him the bag and began to tell me that I had great potential to be a massage therapist, they really liked my style and who knows where this could lead too. She asked to see me again tomorrow, same time after work. He opened the bag, revealing stacks of brand-new hundred dollar bills separated with rubber bands to count by the thousands. He grabbed one stack and took out two crisp notes, placing them in my hand. He laughed that it was nearly my whole week's wage at Mar-A-Lago. Only there I didn't have to degrade myself as his new little toy.

When I got home my parents were anticipating my arrival. I kept it simple and sweet with my folk's, only telling them of the lessons about the body I had received and the future prospects in massage therapy that lie ahead. Nobody questioned who I was working for and complimented my ability to be a hard worker. I quickly got out of that conversation afraid I might give away a hint of shame in my eyes but no one caught on. I excused myself to the bathroom to have a shower and stared into the mirror for a moment, asking myself if I could really go through with this only to mentally respond by reminding myself this would be as good as it gets for a girl of my stature and limitations. I scrubbed myself rigidly in the shower as if it would wash away the filthiness of the night, but it didn't help. I could still feel their hands in me and all over me and inside of me. Trying to sleep that night was nearly impossible too, closing my eyes only to drift away to flashbacks of the moments I had to give myself to Jeffrey and Ghislane, each replay an exploitation of my vulnerability.

The next morning I awoke feeling anxious about the day ahead, trying to push yesterday's memory from my thoughts, I was quiet for the whole trip to work with my Dad. Before we got out of his car in the parking lot he asked me if everything was okay, I lied, for his sake and mine. My life was being transformed and I didn't even know it yet, but soon enough I would be a brainwashed tool only used for the sexual pleasure of others.

About to be entrapped in the same life I had broken free from only months ago.

Convincing myself in order to succeed I had to step up from being a girly teenager and start thinking like a young woman, it would be my ticket to a great career and a fortunate life. I told myself "So what if I had to bargain my body to this rich old geezer, some girls get themselves through college by becoming a stripper and using their bodies to pay for degrees, others go down even worse paths." I guess it was just another way to fathom the road I was going down, the effectiveness of the lies I forced myself to believe was working as I continued to tell myself I had to make it any way I could rather than ever letting myself sleep on the streets again. I was trading one shocking lifestyle for another, thinking I was choosing the right one. If I could go back in time to ever meet myself I would choose this time in my life. I'd start with a good hard smack to my head to first shake some things up in there and next I would tell that girl she could actually make it on her own if she just worked hard at earning an honest wage and built her life up slowly. There is no rush or time limit to ever stop reaching for achievement. Sadly enough I probably wouldn't of even believed myself anyways, learning my life's hard lessons through the experiences I continued to suffer.

I went to work at Mar-A Lago that day trying hard not to think of what lay ahead in the afternoon too come, but the later the hour got the more distinguished the knots became in my stomach. I spoke to no one of the details to my explicit interview but told one girl how I was so happy I was now officially studying massage therapy, another lie. My friend was surprised and intrigued that these people who could afford the best of the best of therapists in the world chose an untrained fifteen-year-old girl to perform a massage. She never said it in words, but her body language told me she knew exactly why they wanted to use me and it wasn't for a therapeutic reason either and deep down inside I understood.

The rest of the afternoon slipped away quickly and before I knew it I was standing before those large wooden doors again, giving a moments pause but long enough to draw in my breath and exhale some of the anxiety before ringing the doorbell. Juan answered the door again and told me Ghislane would be down in a few moments and asked to follow him into the kitchen. There was a pleasant looking young girl with blonde spirals in her hair that glanced up from the mound of paperwork before her. Her shocking blue eye's and appealing English accent seemed delightful and she introduced herself as "Emmy", Ghislane's Personal Assistant. I introduced myself as "Jenna" which is what most people knew me as and told her I was on an employment trial to become Jeffrey's massage therapist. She had a coy smile on her face that told me she knew exactly what I was on trial for. Something in my gut told me

this wasn't the first time a young girl had been trialed for the same position I was about to fill.

We were only chatting for a moment before Ghislane appeared and told me Jeffrey was ready for his massage. I was led through the extensively large house to the winding staircase that would lead me up to the same dreaded room where I would have to re-enact last night's performance. I wasn't far from wrong. I gave Jeffrey a massage with Ghislane leading the way again, this time we surprisingly made it to the front of his body and she continued to show me how to massage all the way up to his stomach pushing my hands in a spiraling clockwise circular motion to not disrupt the bowels and then we came up to his chest. He couldn't dare contain himself for one second longer, telling me to put my lips on his nipples and give them a kiss. Jeffrey moaned in pleasure and Ghislane started to undress me from behind. Within moments I was completely naked and Ghislane had her top off. She was caressing my body with her hands while Jeffrey moved his hands down to stroke his loins while he watched her and I kiss and touch each other. I didn't know if she was doing this for the sake of his eye-candy but she sure did act like she loved having the control over me telling me what to do throughout the entire threesome. Jeffrey's climax was always the end to our sessions and this time he wanted to have me make him orgasm orally. Afterwards we went for the ritualistic steam-room, this time Ghislane joining in with us for conversation. She asked me to massage her feet this time while we were in the steam room, showing me that Jeffrey wasn't the only one I had pay my homage to. We all had a shower next and then we all went downstairs to pay me and have Juan drop me off back home.

The following afternoon I received a call at work, surprisingly it was Ghislane asking me to come over when I got off of work again. The compliant side took over and I told her I looked forward to meeting with them today, instead of telling her to go screw herself for lying to me and making me degrade myself more each time I saw them. I finished work for the day and my Dad brought me over to El Brillo Way again, where the vultures were patiently waiting in their lair, he wished me well as I hopped out of his big truck, looking ever so much like his little girl again. I gave him a smile and a wave as he drove down the long driveway, waiting for him to suddenly turn back and not leave me alone to my task. I shook myself out of that calamity and put on my "big girls" face.

Juan brought me to the kitchen again as I waited for Ghislane. He offered me a cold drink and some fruit on a platter, I accepted and was grateful for the rejuvenation before I went to work again. It wasn't long before Ghislane approached me from behind with a cold intense look in her eye. I jumped from my seat, feeling like maybe I shouldn't have been eating and drinking while on the job, as her demeanor seemed annoyed

and temperamental in the seconds that she appeared. She told me I would be on my own today as she had business to attend to, so make sure I remembered what she had taught me, as my trial depended on it.

Chapter 5

I walked up the stairs by myself this time, taking in more of the décor, noticing the more I looked around the more I noticed a different girl in each photograph in his collection of half-nude and topless girls on display around his mansion. I couldn't believe how many girls there were, it's not like Jeffrey was much to look at. He was an aging man in his early fifties with shiny grey hair and characteristic lines drawn down his face as if he had seen harder days. With no prospects of ever settling down or having a family of his own, Jeffrey treated us girls like a piece of clothing he could try on for the day and get rid of the next. So why was there so many girls in these photo's? I wondered to myself if I would end up one of those girls among his collection of forgotten relationships and broken promises.

I continued to make my way up the stairs, and as if all of my senses were heightened from my bare nerves being exposed, I could smell the cleaning detergents recently used by the housekeepers, my observations of the shade of lighting through the concealed blinds as I entered Jeffrey's bedroom appeared golden, and the sound of stillness except for the thud of my rapid beating heart all made me more aware of how nervous I was to be on my own. Not that Ghislane was anything of a comfort, but I didn't know what to expect or how I was going to lead myself into upholding my obligation in pleasing him. I would hope for the best I thought, trying to uplift my confidence as I opened the door to the massage room with the typical scene of Jeffrey laying naked facedown in the massage bed waiting for his entertainment. It was de'ja'vous' all over again. Repeating what Ghislane had taught me, with him commenting on what else I should be doing, until it got to the end and I was expected to grant him all of his spoken desires. We finished up with the shower again and he seemed very pleased in my contribution of myself to him, giving in to every request.

He told me to go ask Juan to pay me, as he was lethargic after the massage and intimate affair between us and now was going to have sleep. I walked back down stairs and told Juan that Jeffrey was asleep and said I had to ask him for my pay. He went to Jeffrey's desk and took out the exact amount I was owed without even asking how much I normally get paid. He then drove me home, only to be back the next afternoon.

The following week was a daily routine, providing Jeffrey with massages and continuously being groomed to fulfill all his needs. Often joined by Ms. Maxwell and her assistant Emmy for sexual trysts of all kinds. I was mentally and physically exhausted from the week of working and having to keep up with Jeffrey's strenuous late night activities. I couldn't believe what I was doing but it was all starting to sink in fast. Most nights when I got home, I'd briefly say "Hi" to Mom and Dad before heading straight to my bedroom. I couldn't even sleep well anymore. Closing my eyes at night I would fight the inevitable flood of thoughts, replaying the moments of shame that ate away myself piece by piece. My only reasoning being I just had to keep telling myself it would all be worth it in the end.

This afternoon Ghislane appeared to be in a much better mood. Instead of taking me straight up to Jeffrey she took me to a yellow guest room where Emmy mostly stayed. It had a balcony where Emmy was already outside reading a magazine and puffing on a cigarette. Ghislane lit one up too and then offered me one. I hadn't smoked cigarettes much before, besides trying to look cool in front of one of my friends, but never really took to them, so when I started to cough from the inhalation of smoke, the girls began to laugh and joke about my in-experience. It was an icebreaker for all of us to laugh and poke fun at me. I was then able to give it back to them saying I would rather be an in-experienced non-smoker than an old lady with a raspy smokers cough. I don't think Ghislane was used to somebody giving it back to her, but she seemed to like it, as long as she was able to have the last say. I knew my boundaries and she liked that I wouldn't cross those invisible lines. All three of us chatted like friends and it started to feel like some kind of a strange relationship was budding. After about fifteen minutes of chatting away, Ghislane instructed me to wash my hands thoroughly, as Jeffrey hated the smell of smokers, and to follow her down the hallway to the massage room where he'll be expecting me shortly. I did what she asked and sprayed myself with the body spray that I always carried in my purse and headed down the hall to Jeffrey's room.

When I opened the door to the massage room surprisingly it was empty. I sat down on the already made up massage table and was careful not to mess up the neatly folded towels on the end of the bed. It was a good fifteen more minutes before Jeffrey made his appearance. It was strange seeing him in clothes for the first time. He wasn't wearing what you'd expect your typical billionaire's attire to be. He was wearing a pair of sweatpants and a Harvard sweatshirt, which he began to remove immediately. This time he wanted to commence our session in the steam room, so I began to undress as well. We went into the steam room and he pushed a few buttons and the steam began to pour in from the marble

wall's built in jets. There was a bench coming out of the wall also made out of marble that went from either side of the room and had a step underneath it where I was instructed to sit on so that I could begin giving Jeffrey his massage. Our conversation started off about simple things like how was your day at work, and I asked Jeffrey how his day was lounging around, just being polite to each other. He was acting out of character being a lot more attentive and conversing with me about other things than sex or massages for once. Starting with his heels, ankles, toes and arches in the soles of his feet I massaged all the way up to his calves. It took a lot more strength to massage in the steam room without oils or lotions and the constant blowing of steam in your face making me twice as exerted. I was beginning to really start to heat up when the door to the room suddenly opened to reveal two naked women. Ghislane and Emmy acted as if they came in to join us for a steam bath, but my instincts were telling me otherwise. At least the cold burst of air and escaped steam revived me a bit.

So there was Jeffrey and Ghislane sitting on top of this marble bench, each with a young girl at their feet. Emmy and I continued with the massage until they were ready to head into the shower. There were two showerheads that Ghislane and Jeffrey both stood under while they were being lathered with soap bubbles as we washed their bodies. After the shower Ghislane led us into Jeffrey's bed to finish today's session with Emmy, Ghislane and I performing lesbian acts of foreplay on each other while Jeffrey laid back and watched. Stroking his manhood in much delight, he brought himself to climax, and the session was over within moments. We all got dressed and went downstairs to the kitchen for some refreshments. Like nothing had happened at all, it was all so bizarre for me, the whole ordeal with them since this all began. I couldn't understand why Ghislane and Jeffrey had such an openly intimate relationship but yet never regarded themselves as partners. They rarely kissed and never held hands or even slept in the same bed. It was more like a sexual arrangement between the two of them. She brings in the girls for his peculiar taste and he supplies the lavish lifestyle she was accustomed too before her family lost all of their fortunes. I wasn't sure how to act or feel, always obliging to their needs but reserved enough not to get attached, as if there was this invisible hierarchy and by instinct I knew my place.

We all hung out in the kitchen for a while before I asked when Juan could bring me home as I had work in the morning and was tired. They said no problem and called Juan on the intercom right away, but said we'd all have something to talk about tomorrow. I knew it had something to do with my employment trial and from the way they were acting tonight, I could only assume I got the job, but you never know with these

types of people. Their friendships and partnerships can change like the weather.

I went home that night still confused on how I could let myself sink so low, I had to put on an act like I enjoyed submitting my body and being their new subservient plaything all for the fact that I was making anywhere between \$200-\$400 for just a couple of hours. Then spent the rest of the night regressing on the entire event in my head over and over again. I battled those thoughts with the hope that I was receiving a profession out of this and making good money in the meantime. All I had to do was keep lying to myself long enough until I eventually believed it.

Arriving at Jeffrey's on time the next afternoon, as I always did, understanding punctuality was a sign of respect and I wanted them to feel as if they had my deepest appreciation for the once in a lifetime chance they had given to a girl of my history. This time when Juan answered the door he told me Mr. Epstein and Ms. Maxwell were waiting for me upstairs in the massage room. I began my hike up the familiar spiraling staircase and through to the room where my arrival was being deeply anticipated. They were already in the steam room awaiting me to join them. I undressed out of my uniform and folded them in a neat pile, which I placed upon the marble basin. Having one last look in the mirror before I exhaling a deep breath as if I was plunging into deep water, I knew today was a big day. I either accepted their offer and trade my morals for opportunity, or walk away with the prospect of one day many years from now trying to make it on my own which I knew endowed hardships of there own.

So confused about what decision to make, I just opened the door to the steam room and let them do the talking. Used to the routine by now I sat below Jeffrey and began to massage his feet and legs as I listened in on their ongoing conversation about travel plans for the next few weeks. Ghislane and Jeffrey turned their attention to me and he asked me how would I like to go see the big city of Manhattan. I told them I had never visited New York before and it sounded like an adventure but my job at Mar-A-Lago was only a summer job and wouldn't be able to get the time off, especially that summer was so busy anyways.

Jeffrey then made his announcement, that I should just quit my job at Mar-a-Lago and become his permanent travelling masseuse. He then further persuaded me with all of the luxuries that came along with my acceptance. Rather than being paid \$9 dollars per hour at my current job I could be earning \$200 dollars per massage, which he even said could be a few times a day. Tomorrow we could be leaving Palm Beach together in his private jet first heading to his residence in the upper east side of Manhattan, also the largest mansion in N.Y, and would next be setting off to the Caribbean, where he owned a secluded island just past Little St.

James for a bit of relaxation. The temptation of his grandeur offer wasn't hard to give into, my vulnerability to be lewd into his grasp seemed comforting at the time. The idea that females were nothing more than an empty shell of beauty bound by only a body to offer was a notion I had accepted a long time ago with my first teacher, Ron.

My reaction had to be more than amusing for their egos, even though I was excited to be traveling I could only imagine the likeliness of having to be at their beckon call as well. In my head I just told myself we all do what we have to do in our lives to succeed no matter what it takes, and with no one knowing the truth, I had no one to talk me out of it. I accepted his offer and knew from here on out I would be his servant to his sexual desires until one day I would gain my credentials and only then could I go out on my own and make it in this world that when so young seems so unconquerable. The night advanced into the usual grooming of his requirements, for the next hour and a half being exploited to satisfy Jeffrey's every sexual whim.

My mom cornered me that night, before I had a chance to avoid speaking to anyone, heading to the shower then my bedroom, like I had been the last week. She knocked at my door with a hostile look in her eyes, "Virginia, what exactly does an older couple want with a fifteen year old girl, who has no credentials and with no experience in massage therapy?" She used that stern tone of voice that she's always had, when I was in trouble.

Thus, as impressionable as I was, my blue eyes batted their innocence in her direction and I flashed her a girlish grin selling her the pitch that I had been given earlier that night. Not mentioning the other side to the glamorous lifestyle I would soon be living in. I told her about the money I'd be earning, the places I'd be seeing, the people I could meet and most of all the trade I'd be learning. It all sounded so good, except it was a bunch of lies I had to tell her and myself to otherwise convince us, that this was a once in a lifetime opportunity, and I had to take it.

She asked when all of this would start, and I as shocking as it was to me too, I told her I had to go start packing. We were leaving the next morning off to N.Y.C. At fifteen most girls would be sucking up to their parents to go to a high-school dance or to go on a date to the movies with a nervous chap, but I wasn't even asking her. I was simply letting her know that I would be away for the next couple weeks, maybe three and would keep in contact when I got free time. Her daughter was lost a long time ago, and she just now realized it. Backing out of the bathroom, with nothing she could say, she left me wondering to myself who I was becoming.

Instead of driving me to work the next morning my Dad dropped me off at Jeffrey's mansion, he told me not to worry about calling Mar-A-Lago,

he'd take care of it for me. We said our good-byes outside in the driveway, Jeffrey even coming outside to meet with my father to shake his hands and assure him that his daughter will be more than looked after. I hugged my dad tightly, feeling like I was on the verge of a steep cliff, when he let go, so did the last of my innocence.

Juan drove Jeffrey, Ghislane and I to Palm Beaches' Private Airport and the luggage handlers escorted us on the tar mat where we all boarded on Jeffrey's black jet. Larry was his main pilot, he had shiny grey hair and long lanky legs, but a very sincere smile that instantly made you feel at ease. He greeted us at the staircase that led into the main cabin. It was as lavish as I imagined it would be. The seats were enveloped in the finest beige leather with polished wood grain finishes and there was a kitchen in the back with an adjoining toilet. Jeffrey saw the amazement in my eyes and to make it more thrilling he brought me up to the cockpit and let me watch with a bird's eye view of the take off. I was on a natural high when I came back to the cabin and was instantly brought back down when Jeffrey rested his bare feet on top of the reclined seat and instructed me to get to work and start massaging him. My future was in his hands now, so when he wanted something, I wouldn't hesitate in giving it to him.

Chapter 6

Upon our arrival at New Jersey's Private Airstrip, the driver Jo-Jo met us. His name was most likely shortened for something of his oriental decent. Jeffrey liked to shorten the names of his multi-cultural staff into American names. Even Juan and Maria were known as John and Mary. We arrived in the Upper East Side of Manhattan. His principal place of residence was the largest home in Manhattan, eight stories of opulence. It used to be a Private School for boy's many years ago, until Les Wexner, Jeffrey's best friend and mentor bought it for him as a mysterious gift.

There were two large Chinese gargoyles outside the entrance, and beside the heavy looking wooden doors there was an intercom with a camera overlooking us. I walked up the concrete steps into a realm of wealth, glamour and most of all influence. My eye's glistened at the splendor of his palace. Caramel colored marble tiles spread through the first floor, where his gourmet kitchen and dining hall were also located. Then I came to this sweeping staircase that curved into the next level where Jeffrey and I went into his office, even though it looked more like a museum exhibit. Ancient draperies that told lascivious stories of their own covered parts of the elevated walls, and the remaining wall spaces were taken up by rows on top of rows of books. He loved to read, as he

often found it hard to sleep and was comforted in the early morning hours with his literature, or sometimes in other ways I would come to find out. There was a mantle piece and a sofa with two armchairs next to the grand piano that flaunted more of Jeffrey's beautiful conquests, young women posing in salacious pictures, suggesting I could be easily replaced next to one of those girls if I failed in keeping him satisfied. There were also some pictures with recognizable political and royal figures either shaking Jeffrey's hand, or with an arm around each other, even one with Jeffrey and the Dali Lama, although his church was the bank. He liked to use his power, wealth, and money to manipulate everyone in his life.

He made a phone call that sounded business like and I didn't mind, I was quite enjoying taking in all of the beauty around me, I was blinded by all of it. I was still waiting for him when. Ghislane came in. She asked me what I thought so far of my trip to N.Y.C, I knew she was talking about the house, she loved to gloat, even though none of it actually belonged to her, she wanted everyone to believe that it did. I complimented her on the mid-evil looking tapestries and a few other adornments, when she cut me off mid-sentence to compliment it herself, telling me the history about one of the 17th century tapestry's which to an unsophisticated eye, looked to me like a rug on the wall.

Jeffrey hung the phone up and walked over to the sofa where we were sitting next to the mantle piece and took a seat on one of the armchairs. He didn't seem worried from the phone call but his mind was definitely somewhere else from the hard look on his face. We all spoke for a few moments more about the splendid décor before Jeffrey had enough small talk and needed some of his own relaxation time. He told Ghislane he was going to show me to the massage room and he'd be back in a couple hours. She agreed he looked like he could use some time to unwind and with that wry grin of hers, she gave me a look that told me precisely how he was expecting to be relaxed.

We left his office all together, Ghislane going downstairs, and Jeffrey showing me to the lifts. The lift looked like it's original that came with the school. It was made out of brass antique with archaic cuts throughout the arches at the top. It wasn't the only lift in the house, but certainly the most beautiful. We walked down a long hall carpeted in a royal red and golden trim, passing by a bronze pagan statue of the horny little goat God "Pan". How adequate, I thought, fit Jeffrey to a tee. We walked into this dimly lit room. Another daunting chamber that looked like we had stepped back in time to the dark ages. It took a second for my eyes to adjust to the darkness, and Jeffrey beckoned me to follow him through the room to the open adjoin shower, toilet and steam room. The room was in black marble to accent the dreariness, and smaller than the one in Palm

Beach, but it had it's own witchery feel to it. Another unseen side to this Man I was coming to know.

We both undressed and I followed Jeffrey into the steam room first. He loved feeling clean, teaching me that the steam would deplete the toxins from your skin, which was great during a massage when your blood flow is being replenished. I grabbed his foot out of instinct, knowing I had to be constantly on alert to keep this man satisfied. He looked down at me with a nod and reclined back against the wall as the steam pored in, this was his idea of alleviation. I worked up to his calves and within a few more minutes, he said he was ready for his massage on the bed. We got out and towel dried off, both still nude, he asked me to stay undressed, then we headed to massage bed in the middle of the room. He lay down on the bed and told me to turn on the CD player on the wall hutch, where all of the oils and lotions were set out, I hit play and a collection of mixed classical symphonies began to fill the silence. I could tell he wasn't in one of those moods to be uplifted with idle chat, so I remained silent, letting him enjoy my slow movements, making my way up his body. My instincts told me I was right about his mood, as he seemed to appreciate the quietness of moment and the leisurely of the strokes I was using to massage him. When I got to his scalp he turned over, and grabbed my hand to put on his erect manhood. No words spoken yet, I took the gesture and initiated what I had been taught over the last week. While pleasing my master his hands groped my young flesh, penetrating my insides with his fingers, he was only concerned with what he wanted, as if I was a new car out for a test drive and he was pressing his new gadgets. His soft moans were soon brought to louder heaves of breath and my job was done. No intimate kisses, or sweet pillow talk. He showed his appreciation with money, never attachment. We concluded with a shower and he told me he had some business to conduct. He walked me to the lift and told me go to the next level and my room was the first one on the right, it had an intercom in which he can contact me when needed.

I hit number 5 on the lift and took his directions to my room. I opened the door to this massive loft, the size of an adequate house. I walked down the long hall and my eyes took in the magnificence of my surroundings. It was a room fit for royalty, and later would find out had been stayed in by some. The room was trimmed in gold paint and had another eerie tapestry on the main wall as feature. There was a T.V and a huge king sized bed, with goose feathered comforter and pillows.

All of the glitter from Jeffrey's lifestyle he was offering me finally covered the last bit of sight I had left and I let go of my consciousness. Excited by my enthralling day, not having anyone around to have to act reserved, I jumped into the soft bed and lay looking around, thinking about how quick life could change based upon one swift decision. Dazing

into the artistry, the intercom buzzed on the telephone next to the bed and it was a housemaid letting me know Jeffrey wanted to see me in his office now. "Already" I thought to myself, I was just getting settled in. I was worried I was going to get lost in this ancient museum, but I got myself back to his office with no trouble, it was kind of hard to miss. I knocked at the slightly ajar door and Jeffrey called for me to enter. I walked over to his desk, where he was just ending a phone call and he opened his duffel bag full of money. "I'll be out at my other office for most of the day, so instead of being locked inside I thought you should go do some sightseeing for the day since it is your first trip to the Big Apple" He didn't count how much he was giving me he just handed me a bundle out of the banded \$100 dollar bills. He knew just how pull the right strings, making me squeal in delight and give him a kiss in the cheek, since we were never really emotionally intimate, it would be odd to act in any other way, but he seemed to like it.

I ran upstairs to get dressed for "City" shopping and put my make-up on, then hit the streets of N.Y.C, looking for a place to start spending this load of dosh. When I got to the end of 72nd street on 5th Avenue, I had no idea which way to turn, left or right. I thought I'd just follow the lights past Central Park and see the local sights on my way. My eyes were once again peeled back in splendor. I had never imagined a place so busy with the hustle and bustle of all the walks of life. My first stop was to buy a disposable camera and I was off taking photos of every wonder that caught my attention. I didn't do much shopping as I had planned too; I was having too much fun exploring this capacious metropolitan.

When it started to hit dusk I began walking back to Jeffrey's but not before stopping off to enjoy a giant slice of pepperoni pizza, it was the best I had ever had, and considering I was going back to Jeffrey's chickpea and tofu salad's or such. I really hated the healthy cuisine served by Jeffrey's personal chef. I was a naturally skinny girl, never watching what I ate and to eat that food I might as well have chewed on hay. I strolled back to Jeffrey's and was missed. Ghislane scolded me "You shouldn't have been gone so long young lady", "We need to know where you are at all times, you are on call for Jeffrey" I started to apologize, feeling guilty, I didn't want them to think I didn't take my job with them seriously. She cut off my explanation with a short conclusion to this conversation "We will get you a cell phone tomorrow, so we can always find you". I thanked her for her generosity, and she dismissed me to my room. So I wasn't even needed after all, it was just a way for her to place me deeper in their control. The next few days I was on call, as Ghislane said I'd be. Venturing out to the city for only an hour or so at a time, I looked most forward to my outings. I would return to Jeffrey's

mansion to attend to his sexual desires and when he was finished with me, I'd be off to my adventures.

On the day before we were to be heading back to Palm Beach, Jeffrey had a new proposition for me. I could make double the money I was making, if I would look for pretty girls and convince them to come back to Jeffrey's to be further persuaded with money to engage in bi-sexual and sexual acts with Jeffrey and I. I asked him how does one actually propose such a thing to a complete stranger? "Well" he said in a build up to another kind of lesson. "If I were you I would use your charm to entice them and my money to bring them, I would tell them you work for a multi-billionaire who has a taste for young, beautiful girls and with his contacts in the acting, modeling, or rich husband world, your boss could help them. All they have to do is come meet me first." If I wasn't so naïve at the time I would've seen that's exactly what he was doing with me, my prospects were massage credentials, but with too much pain from my past, I could only have hope. Not that I was a shy girl, but picking up girls for one reason alone, only to be endorsed for her body, didn't sound like something I could do. But not wanting to displease my master, I told him that I would give it a go. You could tell he was instantly excited with my agreement, he started to reveal the politics of what kind of girls he was looking for. He wasn't into multi-cultural girls, a very chauvinistic perception; he said they had to be uniquely gorgeous to be accepted by him, but definitely no African-American girls, he was racist against anything different to his kind, a very narrow minded way of thinking for such a supposed brilliant man. The list went on and on. No girls with tattoo's or piercing's, or gothics, no drug users, or prostitutes. Basically he wanted everyone's daughter that looked like the girl next door, with blue eyes and blonde curly ringlets. I just nodded and smiled, wanting this to be over with and move on to another conversation, but so worked up from our previous talk, instead he persisted to show me exactly what I was good for to him. He took me up to the highest loft in his large mansion and he lay down on his large bed, expecting me to know exactly what he wanted done. As always, I complied. Part of me hating him for having to degrade myself to be so subservient to his sexual whims, and another part of me was telling myself to be grateful for the opportunities I was being given.

The battles in my head were beginning to cause me too much anxiety, when we got back to Palm Beach, I asked my Mom to make me a doctor's appointment for some headaches I had been getting lately, so she wouldn't question me. I walked out of the doctor's with a prescription for a mind-altering anxiety tablet called "Xanax", not only did it help with anxiety but it also acted as blanket over terrible memories. So when I had to perform degrading acts, I would take a few pills and forget what

happened within the next hour and be able to become someone without a battling conscious.

I spent my sweet 16th birthday on his island in the Caribbean next to "St. James Isle" he liked to call it "Little St. Jeff's", his ego was as enormous as his appetite for fornicating. I was given a birthday cake and a new collection of designer make-up from London. Ghislane made a joke after I blew out my array of candles and said, "I'd be soon getting too old for Jeffrey's taste, and soon they'd have to trade me in." She was only half joking in a sad reality though. A few days after my birthday, a girl was flying out to the island to join us for a few days before flying back to N.Y.C. I was introduced to a pretty girl a few years my senior, named Sarah. She had long ash blonde hair and big brown eyes that hinted she had a cheeky nature. She had known Jeffrey before I had, and he was supposedly trying to help her get an acting job in L.A. She was obviously accustomed to the lifestyle he provided her, making it ever so apparent with her prompt attention she lavished on him. She would do things like strip nude and bathe around the swimming pool, taunting him for sex. She was good at what she did, even putting me at ease with her cool persona and funny jokes. Jeffrey told me privately that she was one of his best at procuring young girls into her entrapment and delivering them to him when he was in town, and when it came to time in the private chambers with Jeffrey, Her and I, it wasn't hard to comprehend. She was devoted to the moment, giving Jeffrey every imaginable lustful desire he could fathom. On the last night there we all took a trip over to St. James to go for a stroll, odd I thought, it was past 7pm and Jeffrey rarely strayed out past then, unless it was some event or dinner party. While Ghislane and him looked the average couple strolling arm in arm through the streets, he said to Sarah and I, "Why don't you two hit the night club here and see if there is anyone interesting to bring back for the evening?" It was more of an order than a request and then I knew why we came out tonight and why Sarah was invited, tonight was all about training, and Sarah was going to show me the ropes in picking up girls. Although there was no one to accustom to Jeffrey's distinct taste to bring back, watching Sarah flirt from girl to girl like a floating butterfly, gave me enough insight into what I was expected to do.

Within Months I had become his handy little helper. Not only would I run to his beckon call, but I also aided Ghislane in bringing in more girls to keep the appetite of our sexually starving chief from going hungry. I once asked Ghislane, why she did what she did for him, instead of having a common monogamous relationship and getting jealous like normal partners would? She replied simply "It takes the pressure off me having to do it". That said it all, we were all under the shade of Jeffrey's money tree, and not even someone like her could escape from its lure.

Just like Ghislane had trained me it was now my job to reiterate that onto other girls and thus the cycle of girls trying to climb the chain of hierarchy would start all over each time I brought a new one in. The sessions rarely differed much. They would mostly start out with Jeffrey on top of the massage table already naked and me leading a girl into massaging him until his instructions came to remove our clothing and if they agreed to that, then Jeffrey knew he had them in his pocket, and could do what ever else he wanted. He was never turned down in the many years I stayed with him. Never being shy, he would tell us to start kissing each other or depending on what he wanted we would perform erotic acts sometimes with him fondling us, or just masturbating while he watched. On explicit occasions, sex toys would be used on us girls, making it all the more exciting for him to observe. Ending with a payment of \$200 for the new girl and \$400 to me for bringing her. He would then wait for us to leave before adding the events details of names and payments in a little black diary he kept with him wherever he went, so if he were in anyone of the city's he lived in, he would always have contacts for sex.

I was slowly climbing the ladder, as Jeffrey was happy taking me everywhere with him, within the States. Merely at home I distanced myself from my Family altogether and with Jeffrey renting me an apartment in Royal Palm Beach as well as a plush furnished apartment in N.Y.C, there was hardly a need to see them. I just couldn't face everyone thinking they all knew what I was really doing travelling around with a man old enough to be my grandfather who supposedly only wanted me for massages. Much further convincing myself of the lies I told myself, I took a liking to the Xanax, it felt like it was all a dream at times, even meeting up with old contacts from school years who experimented with drugs. I was flying around the country, seeing so many places in America I had only heard about in Movies and making more money than anyone my age and loving it. My friends didn't believe the lies I told them about only being a massage therapist, some of them even asking if they can meet Jeffrey too. At this point in my life my heart went missing for a while and I stooped so low, I was even bringing my friends, I just saw them as easy commission. When I wasn't playing servant to my master, I was partying hard, eventually using ecstasy pills, acid, and marijuana to disillusion the times I would've had away from Jeffrey to think about what I was actually doing with my life. I realized something one day while I was alone, although I had Jeffrey to attend to sexually, it was not gratifying. I needed someone to come home to, someone I could call my boyfriend and that showed me emotion not just a job to get done.

Chapter 7

A knock came to my apartment door one lazy afternoon while we were in Palm Beach. I looked through the peephole and didn't recognize the once familiar face. I asked from behind the closed door "Who is it"? The voice of the reply was one I wasn't anticipating to ever hear again. It was my Junior-High crush and childhood friend, T.J. The last time I saw him I was a runaway and he had let me stay at his house for a few days, telling his parents nothing, he kept me hidden away in his room. At nightfall he said to knock on his window and I could jump through and stay the night. Until I was picked up by authorities during school hours and questioned why I wasn't in school they did some resourcing finding out I was a runaway, then delivered me back to my angry parents.

"Oh My God- You finally answer your door girl", and in a whirlwind, T.J stormed back into my life. Even moving into my apartment, secretly, within two weeks of his arrival. He had changed so much from the last time I had seen him. He used to be this hard looking rocker type, now he was cleaned up wearing preppy clothes and shooting out Tupac Lyrics. He had the same old big brown eyes though, and when he told me he had heard I was back in town but he was unable to ever get ahold of me he just kept knocking at my door every so often, I was sold. How sweet I thought, he must care about me if he was so intent on approaching me, not even thinking he would've spoken to the girls from our junior-high circle and they would've mentioned him I was back in town, what I was doing and where to find me. We were a drug-induced romance, which budded from fake emotions the affects made us feel. He got what he wanted, a free ride and not having to work, and I got what I deserved, a man who could let me go away with this multi-billionaire I regarded as my second boyfriend.

I didn't want to alarm Jeffrey in me having a boyfriend so I kept it quiet, until during a massage I was giving to him one afternoon. We were having a conversation about some of my friends, the party girls I had brought in to meet him. Jeffrey started asking questions about the different types of drugs they used hearing them speak about it in his presence. "I thought a person on drugs would be all strung out and looking like hell, but the girls you know look great" he stated face down during the massage.

That's when I told him I had been dabbling in ecstasy lately too, and I thought it was the most amazing feeling one could even fathom. I tried to describe the euphoric feelings it gave me and even joked with him about wanting to pet anything furry that was around and then there was the constant need to flick my tongue-ring around my mouth. It was great

having such an open conversation about things Jeffrey had never experienced before and he seemed okay with everything I was telling him as we were having a good laugh together, so I thought I could push it a bit further and tell him the truth about T.J, since it was bound to come out sooner than later I'd rather not the latter, when it would look even worse that I kept the truth from him for so long.

"Well why were opening up about things together", I continued by saying "I had met someone from my past and we have been hanging out a lot lately. When I haven't been travelling with you I have been with him and I was wondering if you minded if I started to see this guy." He started to laugh out loud, "Are you serious? Of course not, no one in this world is monogamous, why would I expect you to be?" I was smitten with relief, but a little bit disheartened when I heard him speak that way and I wondered to myself if he'd had his own personal encounter with heartache.

Of course the evening concluded in the same way it always had, the only reason I was really even there in the first place. Upon his request I straddled him on top of the table and let him explode with pleasure inside of me. Thinking the entire time about T.J, I felt so terrible but I quickly had to wipe the thoughts of guilt from my mind not to give Jeffrey the wrong impression. So I had myself busy with two men in my life, but that's not what I really wanted for myself. I wanted an occupation that would eventually set me free from depending on a man as my source of survival.

I asked Jeffrey before I left for the evening, when my real training was going to begin and he liked my assertiveness. I thought it meant to him that I was taking my job with him seriously, but it was all part of his master plan to keep me by his side. Within a couple of weeks of my persistence, Jeffrey introduced me to a couple of real working massage therapists, not only with credentials but with their own clientele too. I was in awe of their teachings, it all made so much sense about the body and what they were saying. I felt like I had picked myself up out of the lurches and had a direction again.

I was in the middle of another training session, with Jeffrey the recipient as usual, being it was rare for Ghislane to ask for a massage unless of course it was for Jeffrey's own pleasure to watch the punch line of the session, when I was shocked to hear Jeffrey ask one of the therapists to now remove her shirt. He had no shame I thought. Even though she was above his usual age criteria, she was still a pretty woman in her early 30's with curly blonde hair and had an athletic body for a mother of two children. She didn't hesitate in his request. It looked like something out of a role-playing porn scene with the therapist removing

her white uniform to reveal her beautiful nude body and a much darker side to her personality.

I couldn't believe it at first it was such a state of shock and I began to question myself if this was normal in the massage profession to expect this kind of clientele to request such degrading tasks even though they were professionals. At the end of the session she was paid \$300 dollars an additional hundred for helping to train me as well, and I was paid my usual \$200 dollars then we were both invited by Jeffrey to join him out by the pool for a cool dip. With Jeffrey making a few phone calls while her and I undressed again for a swim, I wanted to ask her a few personal questions about what she's come to learn about the Massage Therapy game, but I never got the chance as we were joined by Ghislane moments later. She was asking how my training was going and booked the therapist in for herself in the following morning. Where she was invited back to do another training session with me. It didn't take me long to figure out why.

I was at my apartment when I received a phone call from Jeffrey, I thought it was the usual call to come over to his house, but he surprised me. Instead I would be going to the exclusive hotel in Palm Beach tonight, The Breaker's, where I would be meeting my first ever clients. Only told their first names I was given some instructions and the address where to meet Glen and Eva. They were a married couple with one on the way. I was quite concerned when I heard she was pregnant, being I really didn't know the body that well and didn't want to inflict any wrong doing on the unborn baby but Jeffrey insisted I take this job. Just massage her gently where she wants to be rubbed and to save all of my energy for Glen's massage, since it was going to be a four-hour job. In an emphasized tone of voice I was being coached by Jeffrey to treat Glen with exactly whatever he wanted, just like I do for Jeffrey himself. It was my last bit of preparation before he sent me out to his friends and my first taste of responsibility in upholding his reputation.

At around seven pm I took a taxi to the address I was given and found them on the residential side of the giant hotel's extensive property. When I arrived in their apartment it was a far cry from the lavish place I was expecting, still really nice but had a cozier family feel to it. It was just beginning to get dark when Eva and I went into the Master Bedroom and she undressed to reveal the first naked pregnant body I had ever seen. It was fascinating to see her in the later stages of maternity, and strangely enough it was a miraculous and wondrous sight. She was a former model and one of Jeffrey's many entouragees from his past that had gotten to old for his taste and was married off to a wealthy colleague of his.

Lying down on the bed I adjusted the pillows to try and make her more comfortable and I began to massage her as Jeffrey had instructed me to,

softly and slowly. So at ease with her nude body she even asked me to massage her swelling breasts, in a non- sexual way. Not knowing any other way but that way, I was trying to oblige in her request doing the very best I could to relieve her but couldn't help but giggle to myself at the very sight of this. She said she was very happy at the end of the massage and rolled over to go to sleep, asking me to turn out the light at the end of it. I closed the door gently as if not to disturb her, and went to find my other client.

The apartment's lights had been turned out for the sleeping children and I found Glen awaiting for me in the lounge room where I had to call out "Excuse me?" as I couldn't see him in the dark. There was a throw rug on the ground that he had already placed out as he began to strip down in preparation of the massage. Lying frontwards facing me with his exposed and ever growing manhood, I asked him to roll over to begin the massage. He complied with a cheeky smile and from his eagerness to show he was not shy indeed, I already knew where this was going to end up.

I found it much more strenuous to massage on the floor but I wouldn't let that hold me back I wanted to have a career and this being my first ever clients, I didn't want them to disapprove. Nearly four hours after I had gotten there I was still hard at work. Mentally preparing for the end of the session he let me know when he was ready to begin the other side to my job and just like Jeffrey did the first time, he requested me to take off my clothes starting with my shirt. When I complied, the requests kept coming in and before I could change my mind and run away, I was having intercourse with this man that was so comfortable doing all of this while his pregnant wife and children slept in the room beside us. When he had climaxed, we both got up and dressed and he paid me a large tip even though Jeffrey would be the one to actually pay me for my time spent there. Just like it had all started, it had also ended so quickly and now that was that. I had to accept what my duties were and now I could go back to Jeffrey who would be further pleased in my demonstrations to keep him happy.

I was called the next morning to come over to Jeffrey's mansion that afternoon for lunch, a swim and of course a massage session. Knowing all too well they'd be expecting the gory details of last night's events with my new clientele. I came there at 1pm as requested and sat down for a light lunch and a swim. Jeffrey was mostly conducting business from his offside pool office, but he came to ask me if everything went well the night before. I told him I did everything asked of me and I am quite confident both my client's were more than pleased with me. He gave me a quick grin, before he headed back to the office, throwing a purple grape down his throat as he walked away.

Lying out on one of the pool decks blue and white striped lounge beds I was waiting for Jeffrey to finish his business so I could give him his massage. He never took too long with his work, unless there was something wrong and then we would all have to wear his mood but today he seemed fine though, when we went up the stairs he told me we would be leaving for his ranch in Santa Fe', New Mexico in the morning and I'd need to be packed and ready tonight. They loved leaving in the spur of the moment, Jeffrey once said he checks with his pilot Larry on the best weather before he heads to a different destination. I enjoyed spending time at his ranch being it was my favorite of all of his residences. He had a lavish Mediterranean looking castle on top of a hill that over looked his extensive 7,500 acres of property. It has an indoor pool, gym, and all the trimmings of extravagance I could only imagine. I had a great time on the quad bikes, Sarah and I often got scolded for tipping one over going to fast or trying to go up a steep hill, but we knew those weren't the things he cared about, so it wouldn't matter. My favorite of it all was his little town with it's own fire station and truck, stables full of horses, and little cottages where the housekeepers and ranch hands lived.

On my own time I would take one of the quad bikes down to the stables and saddle up on one of his beautiful horses and go for a ride in the open terrain. It was coming up to the end of a very cold winter and it still had the snow covered mountaintops and brisk air that I loved to take in during my many trail rides. I have been an experienced horse rider since my childhood, and could honestly pinpoint some of the best memories of my life being on the back of a horse. I acclaimed with thrill in my voice "Great, I'll get packed as soon as I get back to my apartment" he threw in "Pack for a few weeks, as we will also be making a pit stop to L.A for some business afterwards and then to N.Y.C." I was used to these round trips with him, it was great as I was saving loads of cash and about to buy myself my first car.

Jeffrey, Ghislane, Emmy and I all left the following morning, as planned. Arriving in only a few hours at his awe-inspiring Santa Fe Palace was always a delight. Still frisk in the air, my petite frame looked even smaller in these gigantic overcoats. Nonetheless I was looking forward to spending time out in the fresh clean air and open land. After a few days of leisurely spending our time on the ranch, we went to the Indian markets in Albuquerque for a bit of shopping and sight seeing. Jeffrey wasn't the most off road kind of guy, so when we went sight seeing it was more like museums, boutique shopping, and local art galleries. Still a splendid trip though. With me picking up a few nifty collectables to bring back for my family and knowing how much my mom loves Indian apparel, I thought it would put me back in her good books for awhile, I hoped at least. There was some lengthy time to put a

little water under the bridge between my folks and I. With my life heading in a different direction I didn't see any use in holding on to so much hate especially that I didn't even have to see them that much.

We got back to "Zorro Ranch", the name Jeffrey chose to call the massive land he bought to build his fortress on, and Jeffrey told me that he was looking forward to one of my famous relaxing massages and with that notion he gave my bags of shopping to one of the many housemaids who greeted us at the front door and asked her to bring my bags to the exquisite room I was staying in. We headed straight downstairs just past the massage room and gym there is an indoor heated pool, shower and spa. First Jeffrey wanted to warm up in the spa underneath a decorated ceiling of clouds and blue skies. Starting the massage in the spa I rubbed his feet while he reclined into the spa's jets. We spoke of the museum and some of the knick-knacks I had bought and I thanked him for the turquoise earrings and necklace he had got for me as a gift, joking about not ever knowing what to get for him, being that he was richest man I'd ever known. By no far means did we ever have any kind of a mutual respectful bond between us, but there was a significant softer side he began to share with me that was different from how he treated his other girls. Maybe it was my feet that filled the shoes for that time being, or the fact my novelty hadn't worn off yet, but what ever it was I was getting confused from the double-sided life I was leading.

He got up from the spa tub shortly thereafter and asked me to come wash him in the shower. It was nothing unordinary to me, I was used to his need to be nurtured and pampered. I performed his request with a cheerful mannerism, letting him think I was taking care of him out of my sheer sweetness. I got the towels ready for him to get out of the shower and towel dried him, patting his skin instead of rubbing as previously instructed. "You know you have a very maternal instinct, you'll make a fine mother someday", he would constantly acclaim at my gentleness. "I hope so" I replied, I would love to have my own babies one day, but not any time soon". Laughing at the very thought of that.

We walked up the steps and through the French doors into the gym's adjoining massage room. It was smaller room than in his other houses, placing the emphasis on the large massage bed in the center. I grabbed another clean towel to keep him warm while I prepared the music, lights, and oils. He liked me to use mostly lavender or other aromatherapy scents, which reminded me of woodlands in the spring. Always enjoying the beginning of the massage, I put my heart and soul into training in my profession. I could just close my eyes I would see only with my hands the areas that needed the most work, and even though I wasn't a professional yet, Jeffrey could feel and told me there wasn't many that could please him during a massage being untrained. I'm sure now it was just

something he'd say nice to all the girls, but in the time I had known him I could honestly say it wasn't like him to compliment girls in any other way than regards to a sexual performance or their looks. I was flattered at his praise and when the massage was over, so were the sentiments. I was back to being used for my body and what I could do with it.

With him satisfied and off for a nap, I could go do what ever I wanted, like usually I would go down to the stables or something adventurous, but today I was in a melancholy mood, just wanting to relax and unwind myself in a giant tub in my bathroom. I got out some of the oils I used on Jeffrey putting them in the steaming water and popped two of my Xanax pills, forgetting about my troubles and focusing on the quiet moment at hand, just wanting to soak up the peacefulness of it. Nearly slipping away to sleep in the tub, I was startled when I got the call on the intercom to come down for dinner.

Everybody seemed in good spirits at dinner, which helped to lift mine. We all ate our meals and went into the movie room to watch a newly released movie. It was a ritualistic scenario, most nights that everyone was at ease we would all sit in one of his various located movie rooms and hang out together. Just as he always would Jeffrey asked Emmy and me to both grab a foot during the movie that night and just keep massaging through the film. We were always on call for duty, no matter where we were or what ever time it was. He would just plop a foot up or pass over his hand at any given time and require a massage, even if the film went on for over two hours, I would still be required to sit on the floor rubbing his feet or hands, and even his scalp at times. After the credits had rolled Ghislane got up to close the door to the room and I knew she had received the signals herself and would proceed to manipulate, violate, and use us to satisfy Jeffrey's urges once more before he went to bed.

The blue illumination from the empty T.V screen was glaring in the tenebrous room as we watched her undress in a light that relied on the reflection of the moon through the windows peek to show it's proceeding display. She walked back to the sofa where I was sitting at Jeffrey's feet still rubbing away and uncovered her shirt displaying ample bosoms for his appeal. Approaching me like a lioness hunting her prey she stood me up and led me to the other couch across from Jeffrey and situated herself on top of me, sliding her fingers through my dress to unbutton my attire, revealing my girlish figure and two small peaks. Pushing my head into her breasts I was being fondled by Emmy at the same time, which took her cue when she saw Ghislane look in my direction. From an occasional glance upwards, I could see that Jeffrey was up to his methodical foreplay stroking his manhood while watching the build up to his main event. They both took turns making me moan from their touches and when

Ghislane was ready too she would insinuate we do the same to her. She urged me downwards, until my head was between her opened legs and giving into her wanton indulgence. Twenty minutes passed before Jeffrey exerted his last energies for the night, the only advantage of being with an old man was they could never last long.

Departing to our own separate quarters for the night, I called T.J for condolence. It was so important for me to feel like I had someone out there who saw me as more than a pretty girl with vulnerabilities. I needed to maintain some sort of a connection to my youthful side. But it would be to no avail as I was getting used to being badly disappointed by all the men in my life.

Chapter 8

The phone nearly rang out and as I was about to hang up the receiver when he finally picked up. On the other end of the phone I could hardly hear T.J above the background noises. When I asked where he was he told me "At our place baby", meaning the apartment Jeffrey had rented for me to be staying in alone. He already sounded off his chops elongating his words and slurring his speech. There was music pumping and people shouting behind him and every one sounded like they were having a great time. I was so sick of his friends coming over using my house as a place to party and then trashing it so bad I would even have to sometimes throw my furniture out. I blew up at him over the phone and threatened to kick him out, back to his parent's house, so much for my relaxing evening I thought to myself venturing on to tell him "You leech off me using the money I leave behind for you for drugs and throw these gigantic parties while I'm away." Also mentioning the disastrous messes I would come home too. "I am so close to ending it with you", I would openly threaten, but he knew better than I did, that I just couldn't bring myself to do so, needing some attachment to my youth through all of this. "Don't worry baby" he would say attempting to soothe me with his false words going on to tell me how much he was missing me and how he was always thinking about me when I was away which was like all the time.

I would soon be buttered up and soft for serve. This was my penalty for choosing a guy that accepted my lifestyle with my "Other-Man" as I had so eloquently put it to him once as not only acceptable but deemed it "Cool". The conversation ended with an easy good-bye and no "I-Love-You's" or anything sweet. We weren't those kinds of partners yet, so much time spent away from each other and the lifestyles we both led, I couldn't expect much more from him than what we already had.

Jeffrey and I left two days later, heading off to Carmel in California for a business trip of his, leaving Ghislane and Emmy to catch a commercial flight back to N.Y.C, where we would meet up with them later. When we arrived at the hotel we were given badges for the meeting tomorrow and settled into our rooms. We got adjoining rooms, keeping the doors open at all times, but sleeping in different beds. He liked sleeping alone, even after a late night session I would always go back to my own room. I think that's why he liked me so much I never put pressure on him to become intimately more than what we were already, never giving him the impression I wanted more than what we had. It seemed to keep him happy just the way we were together. I hung out with Jeffrey that night, going to a restaurant for dinner and afterwards watching a movie back at the hotel.

The next morning we went for an early morning breakfast before the conference and Jeffrey gave me some money to go shopping instead of attending the all day meeting with him. I was more than obliged to accept his request, and wished him a good day before planning to meet back in the room around six pm. He gave me five hundred dollars. He said it was just enough to go have fun for the day and a girl of my means could find plenty to do with that kind of money. I walked around the many boutiques that lined the streets of the picturesque cozy town, and picked up some bits of clothing here and there and even met a girl who was passing through on a road trip. She was somewhere in her late teens with golden sunshine tresses, olive skin and blue eyes. Her name escapes me, as it was so unexpected, I think it was Tina or something like that but she was your typical California carefree chic, offering me a few tokens of her jay as we ducked down a side street together. I was so happy I had met this girl, as she was fun spirited and charismatic a relief from the social expectations I had come to know lately, but always being "on-call" as I had been trained up to be, I ended up inviting her back to meet Jeffrey at our hotel later on as a surprise for him. Maybe she was just a bit too carefree for Jeffrey's taste but anyhow she was pretty enough to let him be the judge of that matter.

Over the next hour of hanging out together I found out that she was on a road trip with her best friend who was still sleeping off the hard night of partying from the night before. She was originally from the southern states as she had a bit of draw still left in her accent, and she had recently left her boyfriend because he was leaving for a college too far away not believing in long distance relationships. Then it was my turn to dish out my contribution to the conversation of getting to know each other better. I always got anxiety before I would tell a girl what I did for work and romance (as such), morally I was ashamed of who I was especially with a girl having led somewhat of a normal life. Next, as always, I expected to

be probed with so many more questions and having to make Jeffrey sound ideal and hot for the taste of a young girl and knew I would be point blank lying, so I told her some of the truth which was that he was really rich and paid good money for a massage and useful to have around as a contact. I told her he'd give her two hundred dollars for a two-hour massage with me leading the way and warning her he was known to be frisky during the session. Unexpectedly she said she could use the money and then came the part that I hated the most, but had to do so they wouldn't be as shocked as I was the first time I had met him. "He does like us to be nude though and sometimes asks for more than just the massage itself". All I could do was wait for a response after a shocking sentence like that, and depending on the girl, most were sadly taken back by the money. Her carefree attitude seemed to disillusion for a moment when she gave it some thought and asked me "He's not like, fat and ugly, is he?" "No...no...not at all" I replied, "He's got more of a Richard Gere appeal to him". Trying to make him sound a little more measurable than just a rich old man that likes to be with girls younger than half his age. "Well then, what time shall we meet tonight?" She asked next. Great, I thought, Jeffrey would be most pleased with my find. "Knock on my room quietly, you're going to be a surprise. Be there at around half past seven tonight and I will introduce you to Jeffrey". She threw the butt of the second jay we shared in the bushes and we strolled into a homemade fudge boutique to get some relief for the munchies we now had.

When I got back to the hotel at around a quarter to six o'clock pm as requested I'd be, nobody was back yet, so I took the time to set up the oils and bath in my room for his massage tonight. I thought I would plan it so the girl would be cleaning off, as Jeffrey liked before he had sexual contact with a new girl and he could walk in and be surprised to find a strange beautiful girl in my room who wanted to massage him. Jeffrey walked through the door not long after I was done prepping for the night ahead, looking like he had a rough day at the office, which was very rare for him. He sat down on the bed and I asked him how his day was. He didn't want to talk much about it, saying it was boring and long, rather asking what I got up to for the day. Being coy about having a jay and his unexpected surprise to come, I told him it was a great day of shopping and sight seeing and I even brought him back some local made fudge from the shop that had fulfilled my chocolate cravings only hours ago.

Telling him of the places I ventured into I mentioned to him "We'd have to hit the fisherman's wharf tomorrow. I saw some locals walking around with breadbaskets filled with creamy clam chowder and it smelled absolutely scrumptious." He said if the weather were nice we'd check it out tomorrow before we left for L.A. He wanted to take off his jeans and

collared shirt and put on his normal attire of sweatpants and a sweatshirt. Ushering him out the door for dinner when he was more relaxed I was lucky when he said he was starving and quickly got dressed. We just found a quite spot to eat that was next to the wharf and got back to the hotel just in time for our surprise guest. He wanted to go have a shower and settle down for a massage, so I told him I'd join him in a minute, I just had to make a phone call real quick which he thought was odd and asked me if everything was alright, I reinstated that I'd just be a minute, trying not to let on about anything. The knock came quietly on my room's door just on time, as we had planned and I told her my idea to surprise him. I let her into the bathroom where she orchestrated my plan perfectly. Jeffrey finished his shower without me and when he called out for me I told him that I needed him to have a look at something in my room real quick. Not giving in to what it was that he would be looking at, he came into the room where I opened my bathroom door to reveal a beautiful nude girl bathing in a thick amount of soap bubbles in my tub looking at him with an alluring intrigue. His grin went from ear to ear when she stood up and introduced herself letting the bubbles run down her glistening body at an ever-slow pace. It was a proud moment for Jeffrey, I had done well in his eyes, and she was not like the other girls I had brought to him before, degraded from a lifetime of abuse off the streets. This girl was exactly his pro quo looking sweet and innocent as the girl next door. My efforts were to show him I knew that my only responsibility was to keep him happy at all costs. I led her through the massage on Jeffrey and of course afterwards gratifying his perversion with his lustful requests to be fondled and watch us become more than just friends. I didn't feel too bad at the time with his coercion providing many financial rewards making his scheme enticing to a young, impressionable teen not realizing the terrible memories left to come from all of this. Afterwards he paid her the usual two hundred dollars he gave to everyone for their time and took down her name and phone number writing it in his infamous little black book of the contacts he met in every city but only the ones he really liked made it down in his records.

We went out the next afternoon as I had suggested last night and we ate our clam chowder breadbaskets over looking the wharf's bay, watching the seals playfully barking at each other on the rocks nearby. Shortly after we were driven to the private airstrip and took off for Los Angeles. On the plane was an unexpected visitor. Matt Groening the producer of the "The Simpson's" T.V show was catching a ride with us. I was so excited, as I loved watching his show and acted like a star struck fan, asking him everything from his initial idea for creating the show to where he got his characters from. He told me it was all based on his own family make up,

but without the crazy father and son scenes of Homers hand around Bart's throat.

I was enjoying our conversation, when Jeffrey insisted that I give Matt a foot massage throughout the duration of the short flight. I never turned down a client but when I saw the shape of his feet, I nearly threw up at the thought of having to touch them. He had yellow crusty toenails that even someone with a chainsaw would've had troubles cutting through and then there was the fluffy balls of leftover pieces of sock wedged between the crevices of his sweaty toes, now that was the real icing on the cake for me, no way could I attempt this I thought. Then I had an idea. I went to the back of the plane and rinsed a wash cloth in warm soapy water and returned for his dreaded foot massage but not before attempting to clean them first.

In return for my services Matt was kind enough to draw me two quick sketches on blank paper from his briefcase of my two favorite characters, Homer and Bart. I asked if he would make them out to my little brother and dad, the true fans of the family not missing an episode during dinner over the past ten years or so. Next to the A-4 size drawing he was able to fit in the quote "To my greatest fan from Matt Groening" and their names next to it. I knew they'd absolutely love it, and it was such a nice gesture his feet were no longer an issue as I laughed it off and even made a joke to the comedian about getting a pedicure before hitting L.A.'s beaches.

The flight was only short and we arrived in busy L.A within the hour, saying Good-Bye to Matt, who was a pleasure to meet. Jeffrey had a meeting at a production studio for one of the girls he was keeping lured in his grasps, so we were off yet again for more business. We were staying with one of his old girlfriends, Jeffrey's code for "She got to old for my taste, but was still nice enough to keep around". She was a tall blonde with blue eyes, a stereotypical Barbie doll. In her younger years she had been a successful model and now lived on the beaches of Santa Monica with a sweeping view of the oceans landscape as her backyard.

The next morning Jeffrey and I went out to breakfast. He said Sarah Keller, would be joining us with another one of Jeffrey's girls I hadn't met yet, her name was Nadia Bjorlin and she was a Yugoslavian model turned aspiring actress, with the help of Jeffrey, as he so proudly remarked at the table before they arrived shortly thereafter. She was a stunning brunette with olive skin tones and shocking blue eyes. By far one of the most beautiful girls I had ever met before. She and Sarah approached the table, shopping bags in hands already in the early hours of the day. They both pulled out a chair and showed us their new pair of Jimmy Choo's they had bought on their way here this morning, and excitedly asked for Jeffrey's opinion. He loved the dotting attention and anyone who could make him feel important. We all went back to Sarah's

apartment that Jeffrey rented for her on Malibu Beach. This was the first time Jeffrey came to visit and when we got there you could see why. It was a tiny one-bedroom shack, too small for his likes of accommodation, but she loved it and it was plain to see why, the waves lapped underneath her porch twice a day, what else could anyone want. Before even walking through her door, you could hear the commotion of excitedly screaming females voices coming from inside. There were about five other girls in Sarah's living room and she had invited them so Jeffrey could have a few different girls to choose from. Jeffrey looked at Sarah and smiled, aren't you sweet, as all the girls rushed to introduce themselves, hoping for the opportunities Sarah had offered them to come in the first place.

We all had some coffee and biscuits while the conversation kept getting louder and louder, every girl trying to talk over the next one. Jeffrey could handle only so much of that before getting too annoyed. Instead of choosing one of the other new girls, Jeffrey wanted Sarah to show Nadia and I into her bedroom. He was anticipating the introduction of his two favorite girls together, what mischief he had hoped we would get up to was apparent when he asked where Sarah had kept her play toys and not the fisher price ones. Sarah brought out quite a collection of her personal toys and was giggling on her way out as she shut the door. Suddenly the room behind us went quiet, probably hoping to catch a moan or groans too laugh at and I felt so degraded having everyone knowing exactly what was going on. Knowing my duties well I was baffled this time as there was no ritualistic massage wanted. He immediately instructed us to start kissing and fondling each other with the provided toys straight away seeing his excitement grow watching us try and out do the other one with pleasure, he couldn't keep restraint any longer and started to have intercourse with the both of us, taking his erect penis out of the other to only swap to the other girl, back and forth. This continued for a good fifteen minutes or so while we continued to engage in lesbian acts on each other while the other girl was being subdued by Jeffrey's thrust's of penetration. Nadia was just as dutiful as I was in fulfilling his demented requests, willing to lend her body to Jeffrey and those he sent her too, for the sake of keeping her acting career and putting on a good act at that. She was never competition though. Once I found out where she actually came from I took pity on her for the similar life of servitude we were both accustomed too and not that we ever became good friends but we had reason to relate to each other.

Later on Jeffrey, Nadia and I went to a production studio in L.A, where we had to meet with Nadia's agent as well as the producer of "Day's Of Our Lives". The meeting lasted five minutes, with everyone in consent to the proposal. We flew all the way out there to talk about money, only to be leaving that evening back to N.Y.C. On the way to the airport we

stopped at a fifties looking diner and got a cheeseburger and vanilla milkshake, the first and only time I saw Jeffrey eat what I considered to be real food. Seven lanes to drive in and the freeway was still lined bumper to bumper in the heavy rain. The sound of downpour on the rooftop of the taxi and the rhythm of the windshield wipers was making me sleepy. I was looking forward to sleeping through the long flight back. Thank goodness we had a private jet to catch back, the trip would be comfortable and not rushed to get there on time through the daily peak hour traffic. Jeffrey asked me what I thought of Nadia, more of a kiss and tell kind of thing for him, so proud to admit some of his tenacious acts of pedophilia to me that I knew most people would be embarrassed to even think aloud but I said what he wanted to hear when he asked me what I had thought of her on the way back. I replied, "She is attractive, funny, and seems to know what she is doing with you." Laughing at my statement, he then started to tell me the history behind where he got her. Five years ago when she was merely a teenager just turned thirteen. Her father had recently passed away, leaving Nadia's mother in a tremendous amount of debt and living in a third world country, she didn't have the means necessary to raise her own daughter. When Ghislane approached Nadia for the first time at a music school, she seemed like a maternal, caring stepmother. Telling Nadia's mother if she let Nadia go with her, she would see to it personally that Nadia receive the best education and chances in life to make it. In her customs it wasn't odd for a young girl to be married off to bring the family good fortune, so she kissed her baby girl good-bye and sent her off to commence her life of servitude. I sat there speechless listening to Jeffrey brag about his endeavor to get her over here, shocked that he could stoop as low to use a barely teen to oblige his sexual desires. He was laughing and giddy as he replayed the memories of her arrival over in his head, painting me a horrific picture I had no choice but to imitate a smile to face him with.

No pretty girl is safe from the allurements of these villains procuring the youth off of every street in the world. I knew that day more than ever before those morals did not exist for people like this. Jeffrey once told me that every girl he has had sexual relations with has benefited in their career, finances, or an achievement in marriage with a successful colleague of his. Mine was the massage career, ever so often still giving me a lesson from a professional, which kept me quiet for a while longer. I thought I was already knee deep in this world, if I gave up after putting myself through all of this hell it would've all been for nothing. So I treaded lightly, constantly at a risk of being replaced by another willing participant and playing the eager student he wanted me to be.

Chapter 9

We met Ghislane and Emmy in N.Y.C, and it wasn't a blissful reunion as I hoped for, wanting a break from all of this I was just looking forward to getting back to Palm Beach, not leaving for a further four more days. I got home late in the evening as Jeffrey invited me out to the movies after we had relaxed at his house for a while after landing.

I put my keys through the door to my apartment and walked in to a quiet house. Not thinking anyone was at home I set my suitcase on the floor and put my cell phone on charge as I always did to be accessible for whenever Jeffrey or Ghislane could call. I went to get a drink out of the fridge when I heard some noises coming from the back of my apartment where my bedroom was. I started back there and slowly turned my doorknob to reveal T.J on top of another girl. When they noticed they weren't alone anymore, T.J got off her with promptness. I recognized the girl from seeing her around at parties, and she was the town lowie, scattering her trail of guys along with her presumable diseases, and I wasn't shy to verbalize that when she tried to open her mouth and calm the heated situation between T.J and I. She didn't like her cards on the table in front of the guy she was screwing around with and got up in a fit of rage to attack me. Still nude with only my new white sheets to cover her body, I threw her out of my house along with T.J. "I have been paying your way for months, only finding out your sleeping with the biggest slut in Royal Palm Beach, at least have some dignity and higher your standards." I didn't really have a leg to stand on since I had started this relationship giving him the knowledge I had a sugar daddy to answer to above him. "You're gone all the time and with that old man, what did you expect me to do?" He was right, I wanted what I couldn't have, but I needed some time to cool down and accept my situation. I loved having T.J around to come home too, and he used to be my best friend in my school days. I convinced myself of the lies I continued to accept.

Days later I was still not speaking with T.J, mentally adjusting to my circumstances, I thought I'd have the day off to relax since I hadn't been called all day. Until about five pm when Ghislane called and said Jeffrey would like a massage in an hour. Grudgingly I got up from relaxing on the couch, got dressed and put my make-up on, meeting Juan downstairs a half an hour later. Jeffrey was already lying on the massage table when I walked in. I started the massage being very quiet from my somber mood, when Jeffrey picked up on it and said "you know it's not good to massage people when you're angry, you could pass on negative energy". I wasn't sure if he was serious or just trying to be nice so I could speak about what was bothering me. Ending up not being able to contain my

emotion any further I told him what happened with T.J and broke down in tears, a little heart broken from living in such a lie. He turned around from his massage and sincerely paused for a second thinking he was going to console me but instead he laughed at the very prospect of my notion that monogamous relationships ever existed. "Are you serious, he was only doing what every guy in the world does, you can't hold that against him". I replied in a lighthearted gesture "whose side are you on anyways"? His answer stuck with me for many years to come "I'm on your side which is why I'm going to save you a lot of grief with this one tip, Never expect a man to be faithful and you'll never be let down, it's just the way us men are genetically imprinted." The remainder of the massage I had to pretend like I wasn't further saddened by his response, but in fact having to act enlightened. I would never come to him for any other relationship advice, ever again. He told me I'd be fine if I just listened to my mentor. He still loved role-playing the teacher and me the pupil, like the old days before he got rich and only used to be a college professor. I finished the massage and fulfilled my sexual duties before being sent home wanting to collapse in anguish.

T.J was outside my apartment door when I got there, his mom waiting downstairs in her minivan just in case I kicked him out again. He pleaded his guilt and promised that he would never see her again, agreeing with me that she was the town slut and he screwed up big time. I let him back into my apartment and back into my life for that matter but more aware of the world I was being led into believing was of normal conduct accepted by everyone in this sick world. Jeffrey was going back to N.Y.C and told me to have a few days off before his assistant at his office would arrange an E-Ticket on a commercial flight for me to join him later in the week. I had just made loads of money from my previous trip and wanted to relax like any teenager does, so I threw a hotel party that weekend on Singer Island in Rivera Beach, inviting only a small group of friends to begin with.

The hotel room quickly filled up with a flood of teens and the pumping music was blaring. The room had a balcony overlooking the pool and the beach that became the smoker's section. I wasn't a real smoker at that point, preferring to have a puff of a spiffed blunt instead so I made it my rule to go outside trying to prevent holes in the carpet, but it didn't last too long when our forbidden walls came tumbling down. Making so much money that I could supply my wild parties with an assortment of drugs like trips, ecstasy, and coke as well as an abundance of alcohol, that T.J had all the contacts for, made my fellow teens admire me. It definitely gave me a head swell, thinking here I was so young but so grown up already with all of my peers from high school looking up to me. In the wee hours of the morning we were all still going hard with our eyes

dilated into little black diamonds. We were all having in depth conversations about life and where we would all end up when this charade was all said done. Nobody got to sleep that night as the room slowly dwindled in numbers as people were finding their way home to recover from the repercussions of drugs wearing down out of their intoxicated system.

When I flew out to N.Y.C to meet Jeffrey the next day, I was still in a horrible state. Not knowing what was wrong with me, thinking it was just a bad come down, I rushed out of the elevator and down the hall to my room, sweating profusely, to make it just in time to the toilet to throw up bile again for the uncountable time since getting off the plane. I was having intense cramps in my stomach and when I was called down to meet Jeffrey in the massage room, I had to decline for the first time. I told the housekeeper that I was feeling very ill after the flight, maybe some off food for lunch and needed to lie down for a while. Nobody came up to check on me for hours or even called. Waking up from my much-needed nap, I pulled back the expensive white sheets to find myself in a pool of my own sweat and blood. I was covered in the red stains that drenched the pants I was wearing. I had no idea what was going on, I could only focus on the dire amount of pain I was in. In between the heaves of throwing up and crying simultaneously I was able to reach the phone and called the housemaid on the intercom. I told her I needed to go to a hospital immediately and slammed the phone down only to fall back to the floor hurdled in a ball. She didn't hesitate in calling Ghislane who ran up to see what was wrong. Ghislane then called Jeffrey who was in his office at the time and told him to hurry up to my level, stressing to him that it was an emergency. Thinking they really cared about me for the first time since I had known them, they came with me to the hospital with me. Now I realize I was only a liability in getting them caught and they needed to get to the doctors before I could say anything incriminating. They were suspecting the worst now and seeing he never wore a condom with me and from our previous conversations they knew I always made T.J wear one, they feared the situation at hand.

When he saw the catastrophic state I was in at that point, it was the housemaid who helped me get up and assisted me down to the car where Jo-Jo was waiting for me. He drove us to either Lennox Hill Hospital or Mount Sinai, I can't remember, as it was so blurry in such a bad condition. Rushed in for immediate testing I was uncontrollably vomiting and in so much agony, I was given an injection to help me to subside the intense pain. A nurse came in to ask who would pay for this and although I insisted my parents insurance still covered me, Jeffrey persisted that he take care of all the medical bills and gave the nurse his information.

When the pain relief kicked in, everything and everyone dwindled away until I felt like Alice in Wonderland who just swallowed the shrinking tablet and everyone standing around me seemed to move so quick, speak so loud and hover above me. When I awoke from my induced state, I was alone in a different room. Not knowing at all what went on but feeling a little better, I called in the nurse who looked through my charts and checked my vital signs. Then told me the doctor would be in shortly to inform me of the conclusion to my illness.

He was a tall man with dark hair, and a hardened look about him obviously from his job and constantly seeing the worst horror stories man could think of, he just bluntly told me I had miscarried in early stages of pregnancy. I should be fine to go home as soon as my course of intravenous antibiotics was complete. The news sunk in fast and hit a deep nerve. I waited for the doctor to close the curtain before I let out any emotion and cried for my disastrous lifestyle that was dragging me into a world that I wanted to break out of. This reoccurring cycle of believing I needed men like Jeffrey to succeed in my life was draining the last bits of sensitivity left in my heart. I was picked up by Jeffrey himself who took the doctor alone to the side of the busy hallway to have a private conversation about something. Jeffrey wasn't comforting at all, instead he sent me back home to rest for a couple weeks, and I only fell deeper into a depression, using all forms of self-medication to treat my sorrows.

Two weeks later, as if Jeffrey was trying to lighten my spirits, he told me I would be going to his island to meet a new client. He is a Harvard Professor, named Stephen [REDACTED]. I would be spending two days with him showing him around the island, dining with him, and treating him to a massage whenever he wanted. Without Jeffrey even verbalizing the need to have sex with him, he told me to keep him happy like I had my first client. I packed my suitcase with island apparel, and kissed T.J good-bye, who had at least offered me a warm embrace upon the news of my miscarriage but none other than that knowing it wasn't his.

Stephen was a quirky little man with white hair and a mad scientist look about him. We arrived separately and I greeted him when one of the housekeepers picked him up from the airport and arrived by boat, instead of helicopter as Jeffrey and Ghislane often arrive on. We made our acquaintances and he looked as if he was tripping over himself with words, obviously delighted with his company and location for the weekend. I showed him around as Jeffrey had asked and took him on an adventurous quad bike ride around the small curvy paths, leading the way and letting loose my hair, doing something that gave me a natural high instead of the prescription one. The sights alone were breathtaking from the mountainous peaks of the untouched parts of the island, we sat at a cliff and just sat there, not saying a word to each other besides to

compliment the sights mother nature that appealed to us. I didn't feel as if I owed this stranger anything but what was expected of me by Jeffrey and I could be polite, I just couldn't be myself.

We got back to the main villa to see what time dinner would be served so we could have time to unpack and clean up beforehand. We both met at six pm for dinner on the outside veranda. He sat at the head of the table and I sat next to him, politely folding my napkin to put in my lap. The first time Jeffrey and Ghislane had seen me cut meat and eat with a fork and knife they were so appalled, making fun of my unsophisticated habits. Ghislane took the fork and knife in her hands and proceeded to show me how to politely cut my food and eat. Now that my mannerisms had improved they wouldn't have to be worried about my etiquette when someone important was around anyone. We both drank the red wine supplied on the table and it seemed to warm me up on the breezy night. By the time dinner was served and another red wine bottle later, he seemed to get funnier. I made fun of his tousled hair and he poked at me for my skinny legs, calling me a wanna-be-anorexic. When dessert was brought out, he asked if he could receive one of the delightful massages he has been hearing about from Jeffrey. I gulped more red wine down and sweetly complied with his offer, dreading the moment I'd have to see his naked body, let alone touch it. I asked the housekeeper Kathy that had been serving us that night to please have someone set up a massage bed in one of the cabana's. I went to my room to down a few Xanax, telling him I wanted to freshen up after dinner but to meet me in his cabana in twenty minutes or so. I was ready to go as I had said, twenty minutes later, with the effects of the tablets mixed with the red wine, and I would be free not to feel anything. He was still dressed when I got in the cabana, obviously not accustomed to this and a lot shyer than what I had been used to, I told him he'd need to undress and lie face down on the table, putting a towel to cover his bare bottom to prevent him feeling embarrassed during the massage. I gave the massage my earnest as I always had, and quickly got through having intercourse with him. Not wanting to make any foreplay or anything extravagant out of it, I let him think that's as good as it got, and by the smile on his face, I thought I had done enough.

The next day I took him down to the beach for a real massage under a tiki-hut on the waters edge. It was one of Jeffrey's favorite places to have a massage, as he droned out to the sound of the waves and my gentle therapeutic strokes. Afterwards we had lunch back at the main villa and went back down to the beach to swim out to the water trampoline about one hundred meters off the dock. He didn't do any bouncing around or anything like that. It was just a good base point for a rest spot after a long

swim. What was really cool about it though, was you could see through the mesh and watch fish swimming underneath.

The rest of the afternoon we spent by the pool reading magazines and eating fruit plates. Eventually he went to his cabana to have a nap later on. That night after dinner and my mixed cocktail of Xanax and red wine, I asked if he'd like another massage before I went to bed. He just wanted to stay up watching movies in Jeffrey's theatre room. As peculiar as that request was to me I didn't argue it, I just hoped I hadn't disappointed him in any way that could make it back to Jeffrey. I showed him how to use the remote and turn off the T.V when he was finished before going to bed. The next morning we were both catching a flight from St. Thomas and we had no time for anything other than breakfast and packing, which saved me from having to be too polite as we said our good-bye's from the terminal in the airport, both hurriedly off in separate directions, thankfully. I arrived back in Palm Beach, only to be told to catch another flight the next day to N.Y.C, where Jeffrey would fix me up the money he owed me for treating his colleague out to an entertaining weekend.

Chapter 10

I was fixed up more than what I had usually made for two days, which was great because that car I had been saving for was finally within my reach. I had been waiting for the freedom a car gives every teenager for a long time, and now that I had over fifteen thousand dollars saved up I could pretty much afford to go buy myself a nice car outright. Looking much better than the last time I saw him Jeffrey acknowledged it. I went to his office where he was waiting for me and he had a guest with him. She was unusual looking to the common stereotype drop dead gorgeous girls Jeffrey had normally introduced me to. Of Asian decent, her name was Rena. Jeffrey had met her at an art gallery where some of her own artwork was on display. She had a bubbly persona about her and I could then understand why Jeffrey liked her so much, she fit into the subservient category that he liked his girls to fall under. It was apparent to me that they had already slept together in the short time span they had met, as there closeness was oddly noticeable and I wondered what it was he was offering to her in exchange for her body. I found out later from Jeffrey that he was buying her artwork, promising her the world as an artist, telling her he'd have her work in the all the museums in N.Y.C and the best art exhibits. Everyone was promised something, and seemed to be bought off in some way or another to be in his company. It was only a matter of time that the truth would come out.

To my own amazement Rena was to be assisting me in Jeffrey's massage this day, not being a total knockout or anything spectacular, looks wise that is, but for some reason he seemed intrigued enough. As we made our way through his spectacular mansion she was in total awe at every corner. Commenting on the present artwork and décor that we passed in every hall, it no longer seemed so grandeur to me anymore but hearing someone else speak about it in such excitement reminded me of the days when all of this seemed so unforeseen.

When we got to the massage room, or "The Dungeon" as I used to put it for it's medieval looking appearance, we firstly out of custom all had a steam shower, where Jeffrey expected me to walk her through a servants duties, telling her to take his other foot and start rubbing in small circles and stroking the arches of his foot rhythmically. Rena took the instructions well and began to massage him too. When we all went to the shower next and she followed in my exact lead washing his body as well. Jeffrey absolutely loved the fact that two teenage girls were dually pampering him. Jeffrey wanted to move to the massage bed and I had to further begin to show her about the body, upon his accord. She mimicked my every move up his legs and buttocks, keeping up with every stroke until he could not contain his arousal any longer and was already requesting us to start kissing each other, the start of the very reason we had even met in the first place.

He blatantly stopped the massage nowhere near being complete and turned over to announce his increased arousal in a physical abundance of grotesqueness. Moving over to the small couch in the corner of the room he made a space for her to lye me down on the massage table as she had commanded him to do in such a domineering tone that he wasn't used to being spoken down to with. From that very moment onwards and from the look on his face he was yearning for her to orchestrate an hour of deliverance upon my meek nature. He started to stroke his erect manhood as he was being tantalized watching her take over every inch of my body in a dominating act of seduction. I was left breathless and soar after my first introduction into the world of S&M.

Rena considered herself a dominatrix, she loved bondage, whipping hitting, and eventually cutting her sex partner with little sharp knives until they subdued to her punishment in agonizing pain. She was absolutely crazy if you were to ask me, and I couldn't help but wonder what got her into this in the first place. All I knew was that Jeffrey was absurdly taking into the appeal of watching us two interact, often with her acting as my mistress who would fondle me with an insurmountable amount of whips and toys. Then she would love to finish off every session by hitting me across my face with a hard blow from the back of her hand and sneering over my curled up body showing Jeffrey her ability

to make others surrender to her extreme force. She could be so opposite all of the sudden and be tenderly intimate with Jeffrey stroking his penis lovingly and even speaking in baby talk to him, which he seemed to adore.

He loved us pairing up so much that within months he made Rena an official even renting her an apartment at the same place he had one for me during my extensive trips out to N.Y.C. Sending us out shopping together at all of the underground seedy sex stores downtown we would bring him back thousands of dollars worth of sexy outfits, sex toys and bondage material. His favorite one was a black leather studded collar that lead down the back of my spine to cuff my hands and feet together, offering Rena the most compromising positions to wield her afflictions, one she was excited to pick out for my usage.

She was good at eradicating my softer side though. Helping me forge an unpredictable scenario of me turning the tables on her, making her at my will instead of me always being at her twisted discretion. Jeffrey loved the rivalry between us, both striving to dominate the other one but to me it was just another way of surviving her punishment. All for show I thought she was a madman let loose in a torturous domain of violent sex and unbearable beatings. I wasn't sure how long I could hold off this charade of S & M, I just didn't want Jeffrey to think I couldn't give him everything that she could, always being replaceable in his company.

She and I could often come across as good friends to his blind eye but it was only a matter of time before the animosity inside of me was going to snap. Doing normal things too made it all half bearable. Having a lot of similar interests we did fun things like go to the theatre to watch "Phantom of the Opera" or visit several historical and art museums together, afterwards treating ourselves for a giant piece of greasy N.Y.C style pizza. Like I said, we really liked each other purely as friends but the dominance in the massage chambers was taking it's toll on our strange friendship. One average trip back to N.Y.C, she surprised Jeffrey with a six foot by six-foot oil painting of her and I lying nude in a ying and yang position facing each other. Although we were soliciting each other with sexual innuendo the picture was still very carefully orchestrated to perfectly portray the darker side of Jeffrey's thrills. It was an amazing piece of work, besides the lewdness of it, but she would've known that's exactly what kind of art Jeffrey liked. He was so astounded by her gift as he had previously asked her to construct a small painting of us together but was not expecting anything of this grand magnitude she had presented him with. He lifted her from the ground and twirled her around before he thanked her profusely and embellished her with his profound gratitude, the only thing Jeffrey had to offer, he handed her a small wad of cash as her payment. It was the most appreciation I had ever

seen him show a girl. Obviously moved by her gesture, he got her an exhibit in N.Y.C's "Metropolitan Museum of Art" where she submitted her very own piece. She sculpted an image of my headshot out of clay, shaping it with the strands of my long hair blowing across my face. I was taken aback myself at her creation. She really did have an amazing talent if not for her meaner streak she would've been a great friend. I will never forget Rena, for all of the ups and the downs we endured together.

It wasn't too much longer before I finally had enough of the abuse in the bedroom and I had to tell Jeffrey what I was feeling. She was getting even more violent as time went on, and with her questioning me and Jeffrey why she didn't get brought on long trips with him, she didn't get the fact that she was just a tool for him to use. Jeffrey said he was already thinking about getting rid of her off of his "regular list". He said she was becoming too clingy and he didn't like clinginess or jealousy. I never even got to say good-bye or take the opportunity to keep her as a friend, like a girlfriend to catch up with once and awhile, but that's how it was with Jeffrey, one day you sat under the blanket of his comfortably and the next without any warning you could be discarded like yesterdays news. She would've taken it hard but that's the game we were playing and it was for those who knew what lines not to cross.

I was further surprised the next day when Jeffrey gave me a thousand dollars to go shopping in downtown Manhattan to find a classy dress, on top of being sent to the exclusive beauty salon of celebrity stylist "Frederic Fekkai" for a new look. It was amazing, to be pampered like royalty. I walked out of there feeling like I had replaced a young girl with a young woman, I felt beautiful. He had yet another surprise in store for me. Ghislane called me and told me I need to go to a photo-developing store and ask them for two I.D photos then bring them downtown to Jeffrey's Manhattan office. Weird request I thought. I was more used to posing in full body shots being sexually exposed as a gift for Jeffrey. I did as they asked and took my two photos into the office where Jeffrey's assistant was waiting for my arrival. Still not telling me what the headshots were for, she took them from me and told me to have a seat for a second. A moment later I heard Jeffrey call me into the office. "I like what you've done with your hair, you've gone more blonde, suits your glowing tan". I replied with an appreciative "thank-you" for sending me to such a renowned hairstylist, and shopping money. I showed him my finds for the day, an elegant off the shoulder navy blue dress that had two layers that would swoosh and sway with my every stride. I couldn't wait to wear it on a special occasion, and I wouldn't have to. The pictures I had to bring to him, as he would proceed to tell me, were for my first passport. I was so excited, we were going to France for a close friend of Jeffrey and Ghislane's birthday party, famed super-model Naomi

Campbell. I was so over-joyed with excitement, what girl my age with a background like mine was attending socialite parties and globetrotting the world. It only made it harder for me to see beyond the elusive walls I had put up to protect myself from the appalling truth.

We left in early April first going to London, Paris and then our final destination being St. Tropez in Southern France. If Hallmark had a postcard, St. Tropez would definitely be on the front of it. It was beautiful spring weather and every where you looked women were dressed in bikini tops branded with some kind of designer label embedded into it and the men were following them around like harping dogs in heat. In all of the elegance of the Mediterranean, "La Bastide De St. Tropez" was an impressive landmark. Jeffrey and Ghislane were staying in one of the private cottages, on the park on the grounds, while Emmy and I stayed in separate quarters inside the hotel. The old style cobblestone streets were lined with boutique shops and beauty parlors. It was the hedonistic stomping grounds of the beyond rich and famous.

The next day we went out to lunch at the grand opening of the infamous Nikki Beach Club, where a cheap glass of champagne costs around two hundred dollars and if your not keeping the alcohol consumption flowing like water, you'd be asked to leave to make way for the constant flow of prospectus patrons. That's where I first got to meet Naomi Campbell. She was wearing the typical attire strutting around southern France, a D&G bikini top and a wrap around mini skirt to go over the swimsuits bikini. She was so tall and stunningly beautiful. Her charisma was energetic, funny, and everyone seemed to hang off of her every word and laugh at her every joke. Ghislane and Jeffrey kissed her cheeks and wished her a happy birthday, and then I was introduced and followed in their suit. She was surrounded by a league of assistants, friends and fans, which didn't make it easy for us to all converse but she got enough time in to invite us aboard a yacht of a fellow she was "kind of seeing" at the time for the before party ahead of tonight's event. We went back to the hotel and I gave Jeffrey a massage in his room before we all headed down to the pool to soak in some of the year's first sun's rays.

I loved wearing my new ball gown and feeling like a princess. It was absolutely sensational and made me feel as if I floated in the dress. I swept up my long hair in a twisted clip, only letting down a few curly strands and layered on the mascara. Receiving many compliments throughout the evening when we eventually left the Yacht to make our appearance at the main birthday bash, I couldn't help but feel excitement for the party to come it was the first celebrity birthday bash I had ever been to. Being introduced to model after model and the rich men that followed them around became dizzying. Jeffrey sat back and watched as I buoyantly worked the dance floor, coming back to the table where he

was, only to grab another glass of champagne every now and then. Every so often he'd introduce to me to someone new, pulling me aside to show off his eager young masseuse to his fellow pedo's. These people had so much money pouring out of them. I don't know why he even thought they'd care in the first place. It made me feel good though. At least I knew I made him proud to have me in his company.

Being surrounded by so many of Jeffrey's colleagues and his likeminded people that were considered the most sophisticated and the highly esteemed of today's world nearly made the way I was living lately more fathomable, at least to myself. I thought if everyone looks up to these people and they are all accepting of it, it must be just the way the world turns. I danced with a young prince that night and with all of the help from the bubbly champagne I couldn't remember his name for the life of me. On one of my trips back to the table for another glass, Jeffrey leaned over to quietly whisper in my ear that it was a prince that I had actually been dancing with and I didn't phase me in the least way. I went back to the dance floor and continued to let my hair down. It was a fun bash, the entire crowd sang "Happy Birthday" to Naomi and by the time we got back in the car to retreat for the night, I was giddy from the drinking and dancing all evening. We had a guest in the car, and apparently we had already been introduced, but I couldn't even remember his name in the first five minutes of our meeting again. He was the hotel owner of some large chain in America called "Hilton". Staying at one of the cottages near Jeffrey, he saw it quaint to loan me out for a night's massage to ruin an "almost" perfect evening. Jeffrey told me to come back to his room after I was finished with Rick, thankfully he reminded me of his name but also odd I thought, being so late I would've never imagined Jeffrey could stay up this late but I never made a fuss out of his requests. I gave him affirmation of my understood instructions and headed off with this stranger into the darkness.

I dimmed the bright lights in his bedroom to a softer tone as if it might aid the vision of this short, balding man with straggling remnants of curly brown hair left to show for the remaining bits of youth left in him. I had to ask him to undress and lay on top of the towel that I had picked up from the neatly folded pile at the end of his bed and spread it over the duvet. I didn't want to waste a second in his place, getting right to the very reason I was even there. Turning around while he was getting undressed, being our first time together, I wanted to give him the impression I was actually a therapist and not a finale to the end of the nights entertainment. Not exactly what he had in mind though, given that my impression was already made for me when Jeffrey arranged for our meeting in the first place. His chuckle to my response was condescending as he came up behind me and unzipped my dress which floated to the

bottom of the floor as he was saying “You can’t really expect to give a massage wearing this, here sweetie, I’ll help you out of it.” He just wanted to see the hidden bounty my clothes were hindering his eyes from seeing. I just went about my way trying to get his hands off of me and to get him to lie down for a massage. Making quaint conversation with him was pointless as I was trying to send his thoughts elsewhere other than the apparent perverted schemes replaying in his mind from the heavy breathing he was making and the looks he was giving to me. I was using all of the tricks in the “turn-off” book even asking him about his wife and kids.

Unquestionably he was in seventh heaven turning every one of my distractions into another flattering compliment. He was saying things like “I love what you do you to me, I have never felt like this before, come stay with me and I will pay you double, no, triple whatever Jeffrey pays you!” Knowing he was just a drunk idiot, I wasn’t being lured in by any of his offers of money or a privileged lifestyle, I knew these cages all too well and I was better off sticking with the one that I was at least accustomed to already. Holding back any composure now, he was going extremely wild ravishing at my body trying to tear off my panties like a hungered wild animal. After all of the champagne I had drunk that night it gave me the nerve that I needed to know exactly how to handle perverts like this one, who had been no different from every other shmuck in my life, and I quickly shut him up with a blowjob lasting no longer than two terrible minutes. It had only been shy of a half an hour before I was already getting quickly get dressed and hurrying out his cottage door.

When I got to Jeffrey’s cottage I rushed through the door and told Jeffrey and Ghislane, who were sitting front of the fireplace reading a books, that I never ever wanted to see that guy ever again. When they asked me what was the matter, I told them of every thing that had happened that night even how he offered me to come work for him getting paid triple. I established a lot of trust with Jeffrey that night. He asked me why I didn’t accept the offer and I responded with “Who would look after you, if I were gone?” Like a caring grand father would do, he pulled me into his chest for a hug and told me that it meant a lot to him. It was so late and I was so tired but I still had to give Jeffrey his massage that night. He asked me to just rub his feet as he fell asleep, and thankfully he was out like a light in no time. The next morning I took two headache tablets and a ginger ale instead of a coffee. Trying to contain my hangover as best as possible behind a pair of sunnies it was mid afternoon by the time I had felt like myself again. We spent the day Yacht hopping, soaking in the sunny weather while Jeffrey and Ghislane caught up with old acquaintances, Emmy and I were just accessories to look good on the arms of them. The next day we wrapped up the tail end of

our trip and commenced our flight back into the U.S. I was paid a generous amount and set off to go car shopping as soon as I got back to Florida. Through a private seller, I was able to pay out right for my car. I got a Dodge Dakota in cherry red, and immediately had an impressive sound system put in. She was my first pride and joy and taste of freedom. I would love to drive her down to Lakeworth Beach to sit in my car and watch the waves while I listened to my stereo blare music and puffed on a jay. Letting the rest of the world pass by while I sat back and watched them walk past wondering to myself what their story was about.

I turned seventeen that summer and had accumulated a string of exotic destinations that I had travelled in such a short time. I was given more make-up and a pair of diamond earrings from Jeffrey. Ghislane only wished me a happy day, wondering at times if she felt threatened by Jeffrey’s and my closeness. We went to the island after we left N.Y.C and I asked If Sarah would be meeting us, mentioning it had been a while since we had last seen her. He said he had some bad news about her. Expecting the worse, thinking she had gotten hurt or something, I was astounded when Jeffrey told me that she had been sent to his island with one of his friends for a couple days and when the housekeepers were cleaning her room and they found a stash of cocaine left out carelessly in the bathroom.

He said he had no choice but to let her go. Addicts with no respect for themselves or his wishes had no leeway in Jeffrey’s book. He didn’t mind that I dabbled in drugs once in a while as long as I never brought them along with us on any trips, except for my Xanax, which he didn’t mind because it was pharmaceutical and most of all wouldn’t cause him trouble being a legal narcotic. Sarah took it too far when she crossed international borders with an illegal drug, risking her welfare and almost costing Jeffrey public attention. She lost her apartment and contacts in the acting world, only hearing from acquaintances once in a while that she was sinking deeper and deeper into the black hole of addiction. It was sad to find out, as I always did like her.

At the island, Ghislane had just recently obtained her helicopter pilot’s license and wanted to get some practice airtime and flew Jeffrey and I to St. John where we picked up Alexandria Cousteau, the grand daughter to the inventor of the scuba tank and underwater explorer Jack Cousteau. Ghislane was out to set us affright in the air, but it was all talk, she was actually an impressive pilot. Still a daredevil though, she got her kicks out of hearing us fret on the earmuffs intercom’s. Jeffrey made it clear that Alexandria was a guest when I was told to adhere to her if she wanted a massage, which I obliged her with several times during our first meeting. It was Jeffrey who instigated that her and I reenact as lovers in lesbian acts of foreplay and penetration. I couldn’t imagine a girl with

such high prospects lowering herself to something of Jeffrey's standards, but I later found out through Jeffrey that he had donated money to her continuous exploration into marine life and habitats. She had followed in her family's footsteps, all of them involved in Marine Biology in some way or another. We actually got along really well, she was a real decent girl, and loved talking about her passion, everything underneath the waters surface.

When I wasn't busy giving massages to everyone around, her and I would hang out together. Often we go swimming in the crystal clear pool of ocean that the Caribbean had to offer. Once we swam out so far not paying attention to our location and were carried out to sea by the current. We took turns on the backs of each other, taking breaks against the strong ocean tide. It was almost a possibility that we nearly drowned out there, if it weren't for some guys on a boat out fishing for the day when they caught us in their view. They picked us up and brought us back to the island where we were reprimanded by a worried Jeffrey and Ghislane to first of all let someone know where we are going at all times, and never to lose sight of the shore while out for a swim. After that learning experience I took their heed and proceeded with caution. I had a newfound respect for the ocean and it's mysteries.

Having such a lover of the water as a guest, made Jeffrey want to explore parts of his Caribbean he had never seen before. The next morning we were met by a scuba instructor in St. James and given a few lessons in how to use the gear and more tips like how to descend slowly to the ocean floor as not to cause blood clots as well as visual hand signals to communicate underwater. It was so exhilarating beneath the waters surface. No voices to listen too, only the enchanting sights to take in. We explored the surrounding reef and found a large squid, many of sea urchins, and the magnificent colored coral that housed a many of the rich variety of the local species of fish. It was such a great sight to take in. Holding a permanent mental picture of those adventures to carry in my head for all times.

We all had such a great time that Jeffrey hired the same scuba instructor to come out the next day to scuba dive the safer parts around his island. We got bored quickly with not much to see but seaweed and a fish here and there. It didn't take long before Ghislane decided for us all to explore other numerous locations by boat, Jeffrey needed a bit of convincing at first and the instructor was quick to assure him that he knew his way well around these waters, of course he would say that, he was getting paid a hell of a lot to do this in the first place, why not extend it a few more hours?

The clear water glistened and the tropical array of marine life was on display as we wanted to stop at so many places but you could see as

beautiful as it was it could be as equally dangerous. It took so long as we had to veer away from so many desirable spots. Finally we found a good place that the scuba instructor thought was safe. He buddied us up into pairs and we jumped off the back of the boat into the crystal aqua blue waters beginning our descent slowly into the darker regions of the oceans floor. We were situated on open water with a cavern of reefs to venture in and around down below. It seemed to be quite a choice to scuba in, one that our guide said he wasn't familiar with but to alleviate his bored clientele deemed safe to swim around.

It was Jeffrey and the Guide together, Ghislane and Emmy, and I was paired up with Alexandria. Miles, the houseman, came with us and stayed on the boat just in case something went wrong and lucky he did. We were all too far under the water to hear his alarming screams of distress when shadow's lurking in the murky distance started appearing closer and closer. Ghislane actually looked frightened for once as she gave us the signal to start ascending upwards, reminding us by holding her ears not to go up to quick or as we were previously warned before we could pop a blood vessel in our brain and hemorrhage to death, not a very lovely image but neither was getting torn apart by sharks. Those giant shadows became clearer and soon enough we could recognize their indistinct species as the terrifying and more aggressive breed of sharks, the hammerhead. Grabbing Miles hand I was the last one ahead of the Guide to get on the boat imaging the worst as I waited behind Emmy and Alexandria who were the next to follow after Jeffrey and Ghislane I was in too much shock to scream or cry, I just told myself I had to stay calm to get out of this alive. Unlucky for us we found out later on that we were in their breeding territory and being sent a clear message that we were soon to be on the menu to their feeding frenzy.

We all felt like we had cheated death and I know it wasn't only my heart that was still beating out of my chest when we headed back to Jeffrey's island. Jeffrey was pale as his designer sheets and looked like he had aged another ten years in such a scared state. Ghislane took the heat off herself even barely taking a notice of beforehand and decided to poke fun at all of us frantically scurrying to get out of the water, it was just her nature, as I had never seen her move so quickly either. We got back to the island and all collapsed our fatigued bodies in our own beds for a long nap. Freshened up and much more relaxed we regaled our horrendous story again over dinner, this time in laughter. The following afternoon Ghislane piloted us all in the helicopter to St. John's Airport and we said good-bye to Alexandra where we all parted ways. I met her a few more separate times in Palm Beach at Jeffrey's Mansion, but she wasn't a regular of his, probably not as easy as the troubled girls were to bribe.

Chapter 11

Throughout the remainder of the quickly passing year I was on a constant move with Jeffrey. Attending various dinner parties, mostly with other esteemed billionaires and widely acclaimed scientists. Jeffrey likes to surround himself with the most brilliant and powerful of minds, filling his little black book with some of the most esteemed and even infamous people in today's wealthy society. It was during those intellectual gatherings that my body was also put on the banquet menu but this time for a powerful senator George Mitchell and another prominent Nobel-Prize winning scientist who's name would be mentioned but for all the life of me can no longer remember. They would be only some of the recognizable figures of the high society that became added to my list of clientele, of course being introduced to for a lot more than just a client of massage.

As an amusement to Jeffrey's associates I also knew my place was to entertain but not to every desired content. I was to show them a good time but not the way I would have to use technique and effort for Jeffrey. The very teachings from Jeffrey himself, or my tutor, as he liked to so eloquently put it. Consistently being used and adored for the likeliness of my youthful looks I was becoming very accustomed to my lifestyle with Jeffrey, never really relaxing into it, but just accepting this as being as good as it will ever get for me. I didn't think I should be complaining, wasn't I being offered a life in exchange for servitude? Just letting the signs of my anxiety and depression pass me by while I blanketed them with my pills, suffocating under a blanket of pain is all I was really doing.

I spent Christmas and the New Years holidays with Jeffrey in N.Y.C, who doesn't celebrate the occasion, as he is of Jewish descent. Not that he was a religious man anyways, I never even saw him celebrate Hanukah either. We firstly stayed at his ranch in Santa Fe for a week, then left for a long plane trip to Paris, France where we all suffered jet lag for the next twenty four hours. We all stayed in a grand hotel with a view the Champs' Elyse.

Emmy and I shared a room and with her gifted ability to make new contacts in just a few hours, she brought out a jay to share on the rooftop at nighttime while we were overlooking the lit up Eiffel Tower. We never got really close as buddies but we both knew what we were indebted to and felt each other's sorrows. All four of us went out shopping at Chanel, D&G, Ralph Lauren, and many other little exclusive boutiques the following afternoon. As a gift Jeffrey bought me a white terry clothed goose feathered sofa and had it sent back to my apartment in Florida, and bought some new tapestries to have sent back to Santa Fe for his ranch.

We also visited his up and coming Paris apartment. It was a modern, typical flat being refurbished, and we went to see how it was all looking. Jeffrey liked to fuss about every detail and harass the builder's about their work, changing last minute details at a whim.

Days and many croissants later we left for Spain feeling bloated and sleepy. We only stayed in Spain for the afternoon, going to see another astounding Moroccan castle for Jeffrey to replicate at one of his many mansions. It was only a short plane ride to Tangier, Africa for more castles hopping. We arrived at the historic landmark and the only five star hotel in Tangier called El Minzah in the village of Ville Nouvelle. The city and outskirts were still very hostile at the time, females being warned to not walk the streets alone and not to leave the house after dark or be at risk of being raped or worse.

When we got to the room, it was oozing with every expected bit of extravagance that a luxurious historical palace should offer until I was greeted with a pile of monkey poo in the very middle of my bed. Not a happy camper I called Jeffrey, Ghislane and Emmy into my adjoining room and they all had quite a good laugh at my expense. Within a moments notice of a complaint call to the front desk and we had an attendant cleaning up my bed linen. The cleaner noticed the window was still opened, he warned not to leave it ajar at nighttime just in case another monkey wanted to make himself comfortable in my quarters.

Ghislane joked that maybe I should keep it open I might find a suitable husband before I get any older. Always the instigator of a good joke but unable to take one herself she didn't like when I poked back that it was more in her recent taste of men, since she loved to brag about her rendezvous with her various lovers. Once she came back giddy as a schoolgirl with an explosion of news, with all the build up and excitement in her voice you'd think she was the next crown princess, but she had given George Clooney a blowjob in the bathroom at some random event, she never let that one down.

We all went to explore the towns surrounding Moroccan castles and meet their royalty that lived in them. Jeffrey's personal interior designer's met us at the residences. They walked around hurriedly, scribbling notes into their clipboards and whispering between themselves. The palaces were historically unique and beautiful but I wondered how could they live so grandeur behind these walls when they lived in a city of such poverty stricken squabble. Beggars lined the streets, people could just go missing and no one could care less, and you heard of barbaric murders happening every night. Against the advice of the Palace Attendant and Jeffrey's wishes, I decided to take a stroll one afternoon, mainly just to take photos of exotic Africa and do some shopping in the village markets but I ended up being intrigued by a group of young children playing in the streets.

When I was noticed watching them, about fifteen of them came up to me and began to beg for money and food. I was over taken by the poor, hungry children and I felt sad for them all and wished I could help out somehow. When the tide of kids washed away and the street went empty, I was overcome with intrigue at these two little boys. Brothers I found out later on, and there only toy was an empty can they were kicking to each other in the middle of the street. Intelligent kids, they were able to speak three different languages, including English and I was interested to ask them about life here. They didn't seem to notice or be bothered by their poverty stricken lives. They told me about their school and parents and I thought I had just heard the saddest story ever but they were accustomed to living like that like I had been so accustomed to my degrading lifestyle for so long.

I was compelled to empty out the contents of my purse, giving them over two thousand dollars in U.S currency. A passer-byer snapped a photo of the kids and me for myself to take home as a personal souvenir before they rushed home to proudly show their parents the money. I told Jeffrey later on of my good deed and he couldn't believe I'd give away my money so carelessly. He told me I had set up their parents with enough money to feed and shelter their family for a year. Wasn't that a good thing? I couldn't believe it, not that I was well off or anything close to it, but to realize how lucky I was and to not have compassion for the lesser off, especially children of a third- world country, I wouldn't be human anymore. Then again what did I expect from someone who could numerously steal another man's daughter for the use of his own sexual pleasure with great ease.

We went out to lunch the following day with Jeffrey's team of designers to wrap things up and after Jeffrey's afternoon massage he went to the palace to have a nap. When I was all alone I thought I'd go see the culture of the local unique markets again and this time buy some trinkets to bring home. I got to sightseeing and took pictures of the legs of lamb hung over the blood drenched doorway over people's homes as to warn off evil spirits and the ghettos where the local villager's called home. I walked into many of the market's stalls and saw the most peculiar antiques, such as weaponry with the blood of it's last victim stained on it's sharp blades and body pieces of various animal's for the use of religious sacrifices. I was more interested in the different culture and respecting their ancient way of life with interest, instead of squirming like a tourist and getting grossed out. I thought it was so educational and enthralling in fact, I ended up buying a few sacrificial trinkets to have sent to my apartment in Palm Beach. Not to say that I wasn't looking forward to getting back to the luxuries of western civilization it was a bit like camping, fun and adventurous but as equally dangerous and thrilling.

When we left for the final destination of our trip I was looking forward to eating normal food again, not one to stray for foreign dishes, I'm a more of a cheeseburger and pizza kind of girl, a true sign of my American heritage.

We landed at the Heathrow Int'l Airport and greeted by a driver that would take us to Ghislane's town house in London's central that Jeffrey had recently bought and refurbished as a gift for her. Emmy said "Good-Bye" at the airport, leaving us to go to her hometown in the rural countryside nearby to visit family for a six-week holiday from work. It wasn't a very long drive before we were in the heart of the city and at Ghislane's place. I thought it was a cheery townhouse that had character and the historical pub in front of it and cobblestone streets only added a unique charm to its presence. They were going out for dinner and invited me along with them but seeing I was so exhausted from all the travelling and looking a bit melancholy, I apologetically declined going out for dinner that evening, I rather would be taking a few pills to catch up on some needed sleep. "Are you sure your Okay"? Ghislane asked as she showed me to my room, more considerate than she normally was but I assured her that I was in absolute good health, just tired from all of the recent jet lag. Without another word said she whisked off downstairs, to the car where Jeffrey was waiting for her.

I took the liberty to call my parents house to say "Hello" and catch up with them since I hadn't been home at all for the holiday season this year, always too busy working. They sounded really happy to hear from me and my mom put me on the phone to talk to my brothers as well. I got to tell them about my travels abroad and I had some cool tribal stuff from Africa that I bought for them. They sounded so proud of me, all of them, and why shouldn't they be? In everyone's convinced mind I was making great money, travelling the world, and meeting new faces everywhere I went, why should I spoil anyone's delusions, especially mine. I took my sleeping tablets and had a bath before falling into a deep and much needed sleep.

The next morning I was woken up by Ghislane who I could tell was in a chirpy mood by the way she paraded through my closed door saying "Wake-up sleepy head" and opened the window's shutters to let in the bright sunlight, she had never done anything like this before and I knew immediately something big was happening. She sat down on my bed as I rolled over from my deep slumber and I was able to mutter for an explanation as to why she was awake so early. "Besides the fact it is ten o'clock in the morning and nearly time for brunch, we have a big day planned out for you today." She was waiting for my cue to ask her "What are we doing", when I did, she responded with a convincing enthusiasm "We're going shopping for a new ensemble" she paused for a moment to

build the suspense, before completing her sentence “To go dancing with a Prince of England this evening”. Hoping it would be one of the younger generations, I was disappointed when she told me he was the Duke of York, Charles’s younger brother Andrew. I looked at her with a fake surprised look, one I had to use on many occasions in my time with them, to give an impression of excitement. “What...wow!” I exclaimed with my gifted acting ability. It is a sad realization but I had grown more accustomed to seeing people for their significance rather than the good qualities they possessed, and was able to grin & bear the thought of what I expected lay in store for me.

Ghislane and I left shortly thereafter for the many lanes of designer shops to choose from in London. Her pep talks to prepare me for my duties towards royalty went on and on, giving me the obscure impression I was something of importance, at least for more than an evening. “Make sure your bubbly and energetic, nobody want’s a dead horse” was one of the cheap tools she instilled me with. “Who knows where this could lead for you” was another. As the day grew shorter my anxiety only heightened, anticipating the Prince’s arrival and unable to decide on an outfit, I picked out three. Our last stop for the day was Burberry’s for a nice handbag to compliment our chosen attire. We got back to her townhouse with still a couple hours spare to get ready. After trying on all three outfits and many mental debates with myself later, I decided on the pink mini-tee and dazzling pair of denims with horses embroidered into a pattern. It seemed a lot more my style and age group rather than the other two older looking sophisticated dresses I had picked out. I told myself I was going dancing at a club not to an opera. As most young girls can be during their body changes into womanhood, I felt awkward, you know, big feet, freckles and body hair in unwanted places. They’re things you just don’t want when your seventeen and then you see these iconic billboards of what femininity is supposed to represent and just don’t fit into that picture, never feeling what we all are already... absolutely perfect. By the time I had got ready I was a nervous wreck, but trying to keep my cool on the outside was an act. I thought it’d be a good idea to take a few Xanax before the evening unraveled and my anxiety went through the roof.

Jeffrey and I were sitting in the lounge room downstairs, waiting for Ghislane to finish getting ready. The room was silent, only stillness in the air. I stared at the mural painted onto the wall that I was facing. It was an interesting piece of artwork. In great detail it illustrated a happy looking family sitting on a bench overlooking a pond that resided on a large piece of land with a beautiful home displayed. There were also hunting hounds and the hunters chasing a game of fox like the notorious “English Hunt Pieces” throughout history. Jeffrey took notice of my enchantment into

the picture and in a hushed voice proceeded to tell me that it was a portrait of Ghislane’s childhood, the part she could be proud of. I never realized how prominent her family’s history was in England, apparently as to Jeffrey’s attest, her Father was born of poor Jewish decent in Czechoslovakia, most of his family being killed upon Nazi invasion in 1939. Fleeing to join the British Army as a young man, he changed his name a few times and made a lot of contacts in the field. After the war, a newfound Robert Maxwell went into publishing using his army contacts to establish a business initially built upon publishing scientific books from occupied Germany. In time, Maxwell acquired several British newspapers, among them the Daily Mirror, countering his wits against the likes of Rupert Murdoch along the way. However, whilst constructing his publishing empire, Maxwell compiled astronomical debts, and his equivocal financial dealings attracted the attention of governing authorities that judged him not to be looking out for his companies best interest and in the end it transpired that Robert Maxwell had been using proceeds from his employees pension funds to meet his financial debts, ruining the futures of thousands of employees. Once an esteemed Member of Parliament and publishing mogul, Robert’s body was found floating in the Atlantic Ocean after he was found to be missing from his yacht, the Lady Ghislane (named after his favorite child), whilst cruising the Canary Islands in 1991. Jeffrey went on to tell me that when her Father died she was inconsolable, and in a very bad state. He picked her up from the trenches of despair and took her under his wing, and it’s there she has stayed comfortable ever since. To Ghislane his peculiar need to have so many woman around and even his taste in younger than legal one’s didn’t seem unconventional to her. It was her own Father who was deemed a womanizer and even took a second wife whilst still married to Ghislane’s mother. I would have never guessed this carefree, spirited, and vivacious woman had ever endured such sorrows. I couldn’t help but look at her in a different light from then on, but not letting her know that I knew, to avoid any altercations between us.

Like clockwork Ghislane came downstairs five minutes before Prince Andrew were to arrive, wearing a tight-fitted white woolly turtleneck singlet and a nice pair of loose fitting trousers. Looking elegant and casual at the same time, a very hard look to achieve but one Ghislane had always easily mastered. They both seemed at ease poking fun at my obvious nervous state, just another ordinary night out for this extraordinary couple. The knock came at the door just after six o’clock in the evening. Ghislane greeted him and the guard who would wait for his return in the car. She led him down the hall to where Jeffrey and I were sitting. We both stood up and Jeffrey shook his hand, while Ghislane proceeded to introduce me and as I was taught by her was English

custom, we both kissed on the cheek. We all sat down on the lounges for some tea and biscuits while conversing idle chitchat. By the sounds of it, Ghislane knew well of his recently divorced x-wife Fergie, whom they were all taking turns in slandering her for one reason or another. It was apparent there were some fresh wounds still lingering on and as good friends do, it was their way of helping him get over her. When his daughters were mentioned, Ghislane and Jeffrey treaded lightly, only speaking highly of them, and offering their sympathy to the young ones.

The conversation turned to a much lighter subject. Andrew wanted to know more about this young guest they had to join them out for dinner and dancing that evening and then the spotlight turned on me. I was more nervous than I had ever been before a night out with someone, probably the build-up Ghislane and Jeffrey had hyped this meeting up to be. To break the ice, she played her favorite guessing game... "how old do you think Jenna is"? When Andrew guessed correctly, I was seventeen years old, she was surprised, thinking I could have passed for younger. "I guess we are going to have to trade you in soon" she laughed, always the first one to throw in her quick-witted two bits, all of them chuckling along with her. Hardly a laugh at all, unknown to me at the time his eldest daughter is only five years my junior. I was finding it hard to make much conversation in the beginning, just laughing when the occasion called for it, and keeping up with Andrew's constant glances in my direction, was all I could manage.

The restaurant was a close drive for us with Andrew, his two guards and his driver following behind us. I was seated next to the Prince for dinner and Ghislane and Jeffrey next to each other, an evening pre-ordained. I was supposed to flatter him with compliments and dote on his every word spoken, but I didn't even do that for Jeffrey blatantly, it would've felt awkward to act like a bimbo for him. Instead I remained calm, cool, and collected, hoping that my nervousness wouldn't spill out at any given moment. The next place we were going was much more my style, and I found it easier to relax. We pulled up next to a Nightclub called "Tramp", a member's only nightclub, and one of the most exclusive haunts in the world for the rich and famous to be seen for the last forty or so years since it's doors first opened. Andrew's guards waited outside while we all went in to hit the dance floor. Jeffrey being the social introvert that he was found the first available empty seat in the corner but facing the dance floor to spend the evening watching everyone else have fun and Andrew went to the bar to grab us all drinks. He came back with sparkling water for Jeffrey and a cocktail for the rest of us, already knowing that Jeffrey never drank alcohol. We downed our glasses and made our way to the crowded dance floor, where I had the Prince's upmost attention. Moving his hands across the curves of my body, not to shy away from the fact

that he was in public, he was whispering sweet nothings into my ear and kissing my neck. I would just giggle not really knowing how to reply to an aging man with a bad smile and terrible moves, it would sound too much of a lie if I retaliated back about his swagger. He was the most incredibly hideous dancer I had ever seen and couldn't help but laughing on the dance floor and shooting glances of embarrassment to Jeffrey and Ghislane who were having a good time laughing at my expense...as the always did.

After an hour of pelvic smashing to the D.J.'s pumping mixes we finally exited the floor, his royal highness was dripping with sweat and ready to embark onto a quieter scene where he said we could be alone, not knowing that it had already been arranged for all of us to meet back at Ghislane's place but complied with his so called thoughtful request. I was so anxious about getting back to the townhouse, knowing what expectations I would have to not only have meet but also exceed in this case. Ghislane and Jeffrey seemed impressed at my attempts to entertain his royal highness, so far giving him exactly what he wanted the impression that I idolized him. They told me that he really liked me and was having a great time, so far tonight. When we got to the townhouse, his guards walked him to the door, staying to wait outside in the car. Ghislane met him and brought him upstairs where Jeffrey and I were in the study. We all chatted in the hall for a few minutes and I was able to have Jeffrey snap a photo of us together, one that would cause much controversy for the Buckingham Palace in many years to come. The conversation didn't linger on much longer before Jeffrey and Ghislane dispersed downstairs together, leaving me to my own sort of royal duties. They walked away giddy as if they were teenagers imposing on young lovers about to embark on a romantic evening.

Next to the study was the bathroom where I led him to next. The room was dimly lit masking the light from showing the disparity in my eyes. It was a beige marble tiled floor with porcelain Victorian style bathtub in the middle of the room and nowhere near the size of Jeffrey's residences. I turned on the taps for the tub and the heat from the water began to steam up the small room. On the basin were aromatic oils, lotions and soaps, loving the scent of floral notes, I poured in the lavender bath oil. Trying to do the best of my youthfulness to try and act seductive, I gradually began to strip off my clothing, piece by piece. Giving him time to savor the moment to come. He loved every second of it as I went over to where he was waiting and watching, then began to undress him at a much quicker pace. We kissed and touched each other before submersing into the hot water, where we both continued to reenact foreplay. He was adorning my young body, particularly my feet, caressing my toes and licking my arches. That was definitely a first for me and I couldn't help

but laugh, I hoped he didn't expect the same treatment back. Through my recent experiences with Rena, I drew a line with extreme fetishes, especially ones that would involve my tongue and feet in the same sentence. It wasn't hard to get him wound up to the point where he just wanted to have the rest of me so we dried off from the cold and retired to my bedchambers for the longest ten minutes of my life. Moments later and without any real emotional attachment, he burst in ecstasy, leaving me to my own feelings of dismay. As relieved as I was to see the experience come to pass with him, it was finally sinking in that I would never be anything more than but a muse. Still trying to ascertain a surreal dream a young girl once held but no longer the same girl I was no longer sure that the dream was even real anymore. In the whirlwind thrown together by wealth, power, and privilege I was but a grain of sand and felt helpless down the road I was naively being led down. When the real picture was unveiled, later in my life, I had nothing but memories filled with sorrow to remember of my teenage years.

Jeffrey, Ghislane, and I left for the states to conclude our long journey home to the U.S.A. I was so happy when we landed on our soil and called T.J from my cell phone to see if he'd meet me at the airport instead of going back to Jeffrey's, he'd be there within twenty minutes, he was so happy to hear my voice and that I was back in town. So ecstatic to be getting away from my life of servitude for the next few days, I was sourly disappointed when I got off the phone. As if he'd been listening to my entire conversation, Jeffrey told me he'd like a massage back at his place and he could pay me at the same time for my trip with him. With much dismay I had to call T.J back and cancel the arrangements, I wouldn't see him until later that night, in which one of Jeffrey's staff would drive me home and I would be too exhausted to do anything.

Chapter 12

When we got back to Jeffrey's mansion in Palm Beach he wanted to thank me for showing his friend, the Prince, such a good time. Rewarding my diligence with an extra sum of money and luring me deeper into his goal of keeping me at his side as his personal amusement that he could lend out at anytime. Further proving his capability of using the vulnerable impressions of a young girl to influence and intimidate his fellow peers of

like minds. Jeffrey didn't want to know the grim details of how it all happened on my intimate night with the Prince, he just asked simply if I thought that I did well in keeping his friend happy. Knowing already that the evaluation of my performance I gave was already discussed between them, I just as simply replied back with a nod of approval. Though I did have a laugh with Jeffrey about the Prince's weird fixation on my feet and lets just say that he was quite tickled with Andrew's quirky obsession, having a good ol' chuckle at my eccentric encounter. I was paid extremely well this time, putting my money earned into nothing but popping pills and alcohol by shouting my so called friends a good time, aiming for the attempt to forget about my experiences abroad. I partied like that to feel young again, my age and most of all to self-anesthetize my troubles from within. It wasn't like I was waiting for someone to arrive on his white horse and take me away to a magical world. I simply yearned for more out of life than being someone's replaceable amusement. Still a romantic at heart I would often get lost in my daydreams, imagining a new beginning with a strong man that would show me an enduring love, safety in his arms, and a lifetime friendship. Though the suggestion of true loves existence was only a dream for now, something I could only read about in novelistic fairytales but the passing thought from time to time was warmly envisioned. With my inner most desires being locked away in a deep crevice of my heart, I knew my romantic notions would be absurd in Jeffrey's eyes. For some unknown reason to me he couldn't allow himself to give love or receive someone's heart in return. Once he said to me when I asked him if he ever thought he would settle down and find Mrs. Right and he told me he didn't believe that love with one monogamous partner was possible but he found that love with many was. I thought at the time it had something to do with having so much money and everyone wanting him for that instead of seeing him as a person and even felt bad for him, but now I can understand from his recent lessons unlearned that it was a simple equation of his twisted perversion to become infatuated with the vulnerable youth off the streets. Spending so much time in the entrapment of Jeffrey's embrace, I was becoming numb to the feelings and aspiration to ever climb above this deep hole I had dug myself into. I knew I wanted to escape from this bizarre form of first class slavery but I still didn't have the tools necessary to help me get out. How could I have? Everyone that knew me believed I was living this enchanting life, a rags to riches success story that most people dream of, only I knew the price to be paid for all of this and I was the only one who could pay for it. Underestimating my true self, I was settled by Jeffrey's side for now considering him to be someone to look up to, my mentor. Such a

complicated battle within myself, it is one I still ache to fully comprehend today.

Sunny spring days melted away the ice off the frozen streets of New York and the harsh winter winds began to gently blow away the dead leaves, making the caged trees appear to have some form of life again. I hated the cold winters there, it would only add to my depression being locked indoors. Give me hot Florida days blistering in the sun where I can swelter by a cool pool and sip cocktails with pieces of fruit and little oriental umbrella's floating around. What a vision of solace? Looking around my extravagantly decorated mid-evil room I was reminded of the desolation that I was more than accustomed too. Knowing it wouldn't be long before I was summoned again for another ritualistic occurrence in fornicating with my master, I hardly bothered to leave my assigned chambers, scarcely being sent home for a moments break, I just accepted my fate. As I predicted the intercom buzzed momentarily and I heard Ghislane's voice come over and request to meet them in Jeffrey's study. Not an odd call, I would often meet him there first so he could tie up some unfinished business before heading to the dungeon, or what was thought to be the massage room. Making my way down the hall, I had an eerie feeling wash over me, as if I had several pairs of eyes on me, watching my every move. A cold chill moved up my spine and I had to move my thoughts elsewhere, too easy behind these walls to succumb to my fearsome anxieties. I punched in number one once inside the elevator and it took me down to the floor where Jeffrey and his surprise guest were waiting with anticipation behind closed doors. I cracked open the heavy wooden doors and a familiar face revealed itself. Definitely not expected or pre-warned on my part but I already knew what he was here for or at least why I was called down to the study. Prince Andrew had that notorious cheesy grin slapped over his face, as he looked me up and down like a shiny new car on display and he was about to take it for a test drive. Ghislane led me to the decadent sofa he was lounging on and twirled me around to give him a good lookover before sitting me down on his lap. Like a show pony I knew exactly how they wanted me to be paraded around, with the last of my dignity long lost, I had nothing more to lose. It was easy to give them the reaction they desired, all I had too do was pretend to be entertained by their lewd gestures, and when Andrew cupped my breast with a doll made in his image, I only giggled away. Ghislane wanted to take a picture of the bizarre scene and even got Johanna, another one of Jeffrey's so-called personal assistants, to come sit on his other knee for the snapshot, giving the impression girls couldn't stay away from Randy Andy.

Many crude jokes later and I was asked to show Andrew to the upstairs massage room. I'm sure he already knew where it was from previous

encounters with Jeffrey's "staff" but I led the way anyways, as if he was now my guest of honor. Entering into the dim room it took a few minutes for my eyes to adjust to the darkness, but knowing my way around the room was enough to find the shower. I turned on the steam room and began to undress myself. Andrew followed my lead and disrobed, throwing his attire to the floor. I wanted to run and hide feeling his hands touch me again, but my servitude for Jeffrey kept me there. Getting out of his stronghold I turned my attention to the steam filling up and tried to turn his attention to the marble bench where I suggested he take a seat while I rubbed his feet. By the look in his eyes I knew he could care less about a foot massage, his real desires were being shown by the arousal his body was forming. He indicated where he wanted me to touch him and how. I fulfilled his seedy requests, but only just. There was no pleasure in this for me, the only thing I derived from this event was to sink further into my slumber of depression. I couldn't remember a time when I felt needed for anything other than my body or amusements thereof. After his massage was thoroughly conducted I couldn't wait to get back to my room for another shower. Sitting on the floor of the shower under the harsh spray of water, I scrubbed my body where he touched me. Feeling abhorrent and ashamed what I had become, I let the water wash away the grime.

As the days progressed into nights and the nights followed a trail of destructive months, my outlook on life had diminished into utter sadness. I had lost my spark and my ability to look like I could handle the abusive state of affairs I had drifted into. Sinking deeper in the euphoric state of being on coke and pills, not only was my mentality dwindling away but also my looks. I sure as hell didn't feel like a seventeen year old anymore and now I wasn't looking like one. My eyes had dark circles underneath them from not sleeping and my bones protruded from my skinny waistline and chest. This made Jeffrey apprehensive in keeping me around as often and before I had a moments notice, I was out of money and looking for a job. When I questioned him what was happening, he told me I wasn't the same girl he had first met some time ago now and looked like I needed a break from working so much. "I'll call you next time I'm in town" was the last thing he said to me.

Chapter 13

Going back to an average teenagers life was more of a harder transition than I would've ever thought. Jeffrey stopped paying my expensive rent and I was forced to get off the drugs and look for a real job to feed and shelter T.J and I. It was much harder than it sounded, but I was craving

this in every possible way. Even though a week's wages for working a full-time job as a waitress didn't come close to the money I had made in a couple hours of working for Jeffrey, I was happier than I had been in a long time. I made some friends at my new job and found my duties to be easy and pleasant. I was good at making customers smile and keeping them happy becoming the waitress that made the most tips for the night, which in turn made my co-workers happy since we'd all split the tips at the end of the week. For the first time in a long time I had boys my age hitting onto me, and not that I was ever taken aback by there attempts but it reminded me of how it felt to be around a younger crowd. I missed so much of what I couldn't get back and the more I tasted it, the more I remembered how to smile. The relationship between T.J and I began to falter in a way that was beyond reconciliation. Fights became physical and I saw sides to him that only pushed me away more. He refused to look for work to help pay bills and he became utterly frustrated not having his usual cocktail of assorted drugs to keep him from feeling anything at all. He didn't like the fact I was growing inside and thinking beyond his elusive world. I had gone through too much to accept another form of abuse and degradation. Making that point very clear to him by kicking him out of my apartment back to live with his parents, I felt liberated like never before. I kept up with my rent and cleaned my act up. Enrolling in a yoga course and keeping my focus on staying fit and healthy became my only source of enjoyment. I was free and living for myself.

While out doing the grocery shopping one evening I couldn't help but stop at the local pet store and fell in love with a furry pooch. She was a Japanese Chow-Chow and a bundle of fur that more resembled a baby brown bear than a dog. I took her home with me and instantly she became my best friend. We went for several walks a day and she bore the brunt of many tear filled conversations, she was my loyal companion who understood more than anyone had before, all I really need was someone to listen and funny enough it was her that filled that hole.

Nearly three months had gone by and not a word from Jeffrey or Ghislane. With T.J out of the picture now too all I had to concentrate on was work, my parents and brothers, and of course my dog, Mary-Jane. I was going to family night dinners and bon fires again. My older brother was getting married to an amazing woman in a few weeks and I got to be apart of their beautiful ceremony. Small details of life's journey that I already missed so much of and now being able to smile at the simple things day in day out really seemed to put the real value of life into perspective for me. Everything seemed to be working out for itself and I was really happy, until he came back, T.J thought he'd come over my place one evening while I was sitting at home just watching TV.

Obviously mentally distorted from whatever choice of drugs he was smoking that night. He screamed down my apartment complex, going mad and scaring my neighbors I felt like I had no choice but to let him inside. I tried talking to him as a good friend would, just wanting him to see what he was doing to himself and what he had become. Part of me still loved him and took pity on watching him spiral downwards. Taking him back into my life was not a decision I made whole-heartedly, but was something I did out of guilt and what I thought was loyalty. He moved his clothes back to my place, which was all he ever owned anyways and we tried to pick up the broken pieces. T.J being still badly addicted to many drugs, I had to be very careful where I kept my jewelry and expensive items. I decided to rent out a space at a local spot and store my cherished items away, just taking the necessary precautions, I thought.

Still not working I knew how he was scraping by money and I didn't agree with it, T.J was a known thief and had been caught several times attempting to steal things, even as stupid as DVD's and PS2 or Xbox games from a local Blockbuster. He even stole from his parents, his sister and his brother and would probably steal a piece of candy from a five year old kid if he knew that it would get him his next fix. He hated the change in myself, realizing I couldn't be brought back down by his ways but knowing I still stuck by his side and defended him from anything that would hurt him wanting to believe that he still wanted show the bits of human nature left in his empty heart.

Unable to stand by and see me do well for myself he contemplated a way to try and bring me down. After a busy shift one night, he retaliated with another show of control. I had just finished cleaning up my area and setting out the tables to be ready for the next day when I went to the bar to hang up my apron and put my nights tips in the tip bowl on the counter by the beer tap. On one of his drug induced rampages he stormed into the restaurant where I was working and started to pick a fight with me. I knew he was off his face when he started accusing me of sleeping with my manager on shift that evening. Having no bias or ground to stand on in his attempt to make me look bad in front of everyone, I just laughed him off as a drunk idiot who needed to go home and sleep off the night's repercussions, although I was fuming inside that he embarrassed me but I still made excuses for him and told my boss I had to leave early to bring him home.

The bar was deserted as T.J waited alone for me slumped in a barstool and looking worse for wear. I had to go to the back of the restaurant and do some explaining to the manager on duty, I couldn't afford to lose my job over this incident. Surprisingly he was sympathetic towards my dilemma and even told me I could do a lot better than that schmuck, patting my back and telling me to have a couple days off. I punched out

and headed to my car with T.J in tow. For the rest of the night he was oddly quiet and asked to be dropped off at his parent's house, I was more than obliged to do so. I couldn't stand the sight of him let alone want to be around him tonight. Being so revved up it didn't yet dawn on me that something wasn't right. The next morning I was woken up by an alerting phone call, I had the manager from the restaurant where I worked, on the other end screaming at me and asking where the money is. I sat up in bed, completely awake now, and asked him back, "What are you talking about, what money?" His tone had calmed a bit and he could hear the earnestly in my voice and explained his accusations "The tip jar was empty after you had left last night and there was over a hundred and fifty dollars in there, now it's missing". The answer hit me instantly and I got a terrible knot in my stomach...T.J. When I left him at the bar not even thinking about the tip bowl to talk with the manager, he saw an opportunity to fund more drugs and he took it. That's why he didn't even want to come back to my apartment last night. It was all too clear for me now and I tried to explain to my manager about my boyfriend's sickness and asked him to take the lost money out of my wages. "I have no choice but to let you go and file a police report for the missing money". I couldn't believe what I was hearing. How did things turn upside down so quickly? I exclaimed "Even though I'm paying you from my pocket for money I didn't even steal and you've never even had any problems from me before?". His apologies were short and icy, nothing that could be done. I slammed down the receiver only to pick it up again to dial T.J's parents house and to no surprise he hadn't slept there last night and was not able to be reached. I felt like I was in a bad dream I couldn't wake up from and with no money to pay rent, eat, or even survive, I was back to the drawing board.

The week passed without hearing from T.J, he was in hiding, for now. When the phone rang early one morning I expected it to be him, instead it was a surprise phone call from a familiar voice. Jeffrey decided to give me a call to invite me over to his Palm Beach mansion for some lunch and to catch up, it really was just his way of finding out if I was cleaned up and ready to come back to work for him. With my life in chaos once again and having to borrow money off my parents for grocery food, I saw a quick solution to my situation and was even convinced this is what I had to do to take care of myself.

He greeted me at the door and led me inside. Ghislane was at her usual spot, her desk working away, and we headed past her with a quick wave and lip-synced a "Hello", not wanting to disturb her important sounding phone call. She glanced up quickly and gave a brisk wave my way, then put her attention back to the computer. Once we were inside the poolside cabana, which was Jeffrey's office, & gym, Jeffrey took a seat behind his

desk and told me to have a seat across from him. He took a sip of water from an already poured glass and asked if I'd like some. "Yes, Thank you" My reply was short and polite, already just wanting to get this meeting done and over with. His face was like steel and his expressions were stern, I felt like a child in trouble sitting in the principles office.

He cut straight to the chase wanting to know "Are you on drugs anymore?" There was a moment's pause as I took a deep breath and told him the entire truth. "I got really depressed for awhile and coped with my emotions by blanketing them with mind-altering substances. Just smoking a jay to relax wasn't good enough anymore. I needed to be high and flying to believe I was happy and dealing with all of life's curveballs. Snorting things like coke and popping amphetamines replaced my sorrows with an overflow of endorphins, making it possible to keep up with everything, until I would come down and the cycle just kept on repeating itself".

He listened to me continue to tell him about the good things that have come from the break. Like my dog, yoga, and working at a restaurant, making lots of new friends but most of all, I got my smile back, without the drugs this time. He was really happy to hear the upside of everything, but there was one thing I was reluctant to tell him about. My recent travail that T.J effortlessly caused at the restaurant where I was so happily employed. As my manager had warned he had to file a police report stating that after I had left, the tips were gone, putting the blame solely on me.

Giving Jeffrey a clear picture of the entire ordeal he exclaimed "What are you doing with this idiot Jenna, he is no good for you! I know you can do better for yourself, why do you let him drag you down every time?" Nodding my head in concurrence I went on to finish my epic drama. "I received a phone call from the PBCP asking me to come in about the money, I told them what happened over the phone but they still want me to come in. I don't want to have a record for something I never did or ever would do!" I put my face into my hands and covered the tears now trickling down my cheeks. "I just can't believe this is happening to me when everything has been going so uphill, now I'm out of work and in trouble" I wiped my face and looked up at him "What do I do?" Enabling him as my mentor once again, his sly grin said it all. Jeffrey normally hated when girls made waves in any way and this one would be considered a tsunami but this time it worked to his favor. He wanted me to come back to work for him, continuing my massage studies and I needed his help. In his eyes he was doing me a solid, which in return I would have to scratch more than his back for. Taking his time to contemplate what to respond back and what solution he could offer, I began to worry that maybe I shouldn't have done this.

Pulling a few tissues out of the box, he passed them across the desk to me. Trying to retract any damage done I said to him "I must look like such a mess to you and making you listen to my saga, I am so sorry... I shouldn't have come to you with all of this." He looked surprised and sympathetic "Quite the opposite actually. I'm glad you've come to me for help. I have got a lot of connections especially with the Palm Beach County Police Department. I give them regular hundred thousand dollar donations, and after I speak with them there will be nothing more to worry about. To be honest I'm more in shock about how much can happen to you in such a short time, your life is one big soap opera"

Now he was chuckling and trying to make light of my somber mood. Laughing along too I replied, "I know right? Drama just hangs around me like a bad smell". We did some more light-hearted catching up and went out to the poolside for some lunch and a swim, concluding the evening with an erotic massage upstairs. He paid me the usual two hundred dollars and asked me to come back tomorrow. "In the meantime I don't want you thinking about your sticky situation, consider it dealt with". His attempt to brighten my spirits had worked relieved about money and the police but now I owed myself to him feeling indebted to him more now than ever.

Chapter 14

As was promised I never heard back from the Police Department and Jeffrey had his favorite girl back by his side. We picked up where we left off ever better than before, I being entirely subservient to every sexual desire of his engaging myself in any role he wanted me to play. As he was getting older his appetite for sex never hazed, if anything it only increased. The orgies with other girls got larger in numbers and his appeal to younger girls, new toys and wilder nights expanded from once and awhile to quite an often occurrence in Jeffrey's company. I put it down his new friend and business investment, Jean-Luc Brunel.

A long time agent for young and upcoming models, Brunel, a French citizen, was known for roaming the world in search of young, naïve beauties living in poverty stricken countries and willing to do just about anything for money. He would procure them mostly from Clubs in South America and the Former Soviet Republic. Filling their heads with fairytales of America and large amounts of money, he would promise them all of the finer things in life, sometimes even throwing a pill in their drink, if that meant getting them in his bed was becoming too much of a task. What he wanted is what he got, which is why him and Jeffrey

ultimately became close pals and he invested one million dollars into Brunel's company. In return Jeffrey now had supply of girls on tap for him to choose from.

With the assistance of each other, Brunel obtaining the illegitimate visas for underage-overseas girls and Jeffrey housing them at his brother's apartment complex on 301 E 66th St, Manhattan, they were quite the team. Jeffrey and Brunel would charge them for rent, forcing them to work for them selling their bodies for money, nude pictures, and even pornography. These were what seemed like really nice people with not so nice intentions setting an impression of how the dignified wealth play and behind closed doors they had as much civilized manners as a barbaric chimpanzee in heat. Giving a girl a step-up in finances by teaching them there only worth is what lay between their legs, us girls all were the same in the end, regardless of what country we came from, what language we spoke or our cultural indifferences, we all were being used for one thing alone, our youthful looks and beautiful bodies.

Being Jeffrey's permanent sidekick, I would have to part-take in a many of the hedonistic exploitations that went on at one of his many residences, which meant having to be uninhibited with many girls my age and younger. Being complete strangers was hard enough but we couldn't even understand each other, speaking in different tongues we were expected to excel at performing many acts of lovemaking and foreplay on each other, while being observed by a man in a corner jerking off. Not exactly what I would call an advantage in my stage of life, but in my head I was convinced we all had to do what we had to do to get on with life and if that meant doing all of this to keep Jeffrey happy, then I would do that.

It didn't take long in the accompaniment of Brunel for Jeffrey to hit an all time low, at least one that I knew about. Stupid enough or sick enough, I don't know which one it is or both but Jeffrey bragged about his birthday present from Brunel, once accepting three, twelve year old girls, sisters at that. He replayed the descriptive events with me telling me how they all massaged him and finished him off orally. He was so excited about the entire event, replaying over and over again over the next course of weeks how cute they were and how you could tell they were really young by the small amount of hair growth in their pubic region and non-existent breasts. A twelve year old, are you serious? I thought to myself. I still can't shake the feeling of disgust when I recall the look on his face as he told me time and time again of how his lust brought him to that profound low. He went on to tell me how Brunel bought them in Paris, France, from their parents. Offering them the usual sums of money, visas, and modeling career prospects was a bribe of the worst kind, they were just children. Laughing the whole way through, Jeffrey thought it was

absolutely brilliant how easily money seduced all walks of life...nothing or no one that couldn't be bought in his eyes. Behind the two of them followed a destructive trail of those in their path that were misused, violated, degraded in a variety of ways for one purpose... to satisfy the desires of the perversion that rotted their hearts.

The next couple of months I spent in Jeffrey's company, my life was revolved around him and his petty happiness. Arising to the occasion, I was no longer his teenage sidekick, I was growing into being a young woman and my body was blossoming like never before. Out of the awkward stages of my life, I now took to looking after myself like never before. Regular sessions in tanning beds and keeping fit became my life outside of Jeffrey. He kept telling me what a beautiful woman I was developing into and would offer suggestions to help me look good. Sending me to dentists for regular teeth whitening consultations or helping me choose my attire for the evening, he was ushering me into a whole new position, training me up for something else, but I was unsure of what that was.

Being a snotty little teenager was a girl of the past. Now I had to be his eloquent speaking, desirable to all and almost his personal porcelain doll. I went everywhere with him again, all of his eclectic dinner parties, conferences, and meetings with various members of parliament, famous celebrities, and other esteemed billionaires...most of whom lived by the same rule of thumb as Jeffrey did. Quite an alarming realization having to accept this world the way it is. Jeffrey knew all of the right people in this game, and trading girls for favors is how he kept in the circle. He was at the center of it all, blackmail being the only thing next to money with the ability to pull a many of strings, his conniving ulterior motive was to drag all that he could down to his pitiful state of mind. Inviting easily tempted acquaintances to his island or his other various residences he would bring out the assortment of young girls and pass them around like they were cocktails on a platter. No girl had a choice in whom they went with, only completing a task, we would have to charm and bedazzle these ageing fat men who other than paying for it would've never had a shot at getting to know a beautiful girl intimately. I personally belonging to Jeffrey rarely had to be loaned out and it was a big occasion, or should I say favor, if I was. I'll never really know what made me so important or special to Jeffrey, it definitely had nothing to do with love. I guess in the end I will always put it down to my capability of being whomever he wanted when he wanted, so compliant it just made it easy for him to have a personal toy at his constant disposal. All I can say is I lived in a jail with no bars, and in a country where slavery was supposedly abolished a long time ago but still existed right underneath everybody's noses. Myself and so many other girls were walking proof of it.

I still was given proper training in massage therapy from time to time, keeping me from looking back at being a teenager with no responsibilities to being a young adult with prospering titles. He knew I wanted to be self-sufficient so bad I would do anything for it and by giving me this dream to hold to only kept me in check. I looked forward to my training sessions, holding onto every word passed down to me and after the session was complete I would hurry back to my room and transfer the information into a workbook with associating exercises.

Trying my new moves on Jeffrey always impressed him, he would get excited hearing about my passion for knowledge and would tell me he could see it transfer into my massages, always giving it my all, my hands were a focused energy when I was at work. Using every ounce of strength to apply on a body, many were astounded in what I could do for being such a small girl, and Jeffrey loved it, using me for a two-hour massage "with benefits" sometimes being over twice a day. Ghislane would sometimes use me to massage her still but it wasn't as common, she preferred a man for that job.

Then would come the odd client here and there, of course set up by Jeffrey. Most of which were orchestrated to get beautiful girls comfortable and consequently naked then he would go in for the kill, so to speak, touching them intimately, in their most private of places like their vagina, breasts or anal. When he had us where he wanted, willing and able, then would come the toys, outfits and so on. A scheme he has used time and time again, telling those who know him well "he had never been turned down yet". It was starting to dawn on me how I wasn't getting any clientele that weren't used for Jeffrey's benefit and would make me wonder if I just wasn't good enough for that, but I kept quiet, never wanting to make waves like I had before.

To give me a break from it all as if Jeffrey didn't want to overload me again, he would send me away to his ranch for a few days, what he knew I considered being a small slice of heaven on earth. I'd spend my days roaming the hills, riding horses, and enjoying the solitude of my own company. One afternoon I was out exploring the land on Jeffrey's ranch which covered hundred's of acres with nothing but a bottle of water, my sketchbook and a small case of oil paint. I was on the search for something interesting to paint. A great pastime of mine, it made my soul quiet by creating beauty with my brush. I loved to recreate the images I saw on paper. I would paint anything beautiful that caught me eyes interest, from underwater scenes, animals to people and even fruit, I loved vibrant colors and emotion on display but my favorite soon became the landscape of the Santa Fe's rolling hills and earthly green and beige tones and in certain light it would illuminate into a golden shine. To grasp that feeling I was absolved in at the hardest of times became my greatest inner-

achievement, like taking a piece of that serenity and putting on paper for me to keep in my heart where it still is today, closing my eyes I am able to see it, being there anytime I need to. I was enjoying the heat and taking in the deserts sights when I stumbled off the track and into the wilderness. Exploring everything new to me was my second nature and never even entered my mind what would've happened if I went too far or got lost. I would rather face Mother Nature's wrath than humankind's any day!

After about an hour of drifting off track I came to a pile of rubble, looking like the remnants of an old pueblo made out of clay and rock. I picked up what looked like half of a clay bowl and noted that it had Indian designs etched into the side of it. Excited about my findings I decided to do some more exploring around the fields surrounding the historic site. I collected rare pieces of arrowheads, utensils, and parts of many broken bowls with artwork telling tales of their own. Time was of no essence here and before I even realized the sun had sunk deeper into the hills leaving me without any light to find my way back to the pathway. Feeling silly now after passing by a familiar looking boulder twice over, I was startled when I heard some poor animal become dinner for another, it's screams of agony only amplified louder and echoed in my ear drums, heightening the hairs on the back of my neck and making my heart beat nearly out of my chest.

I was lost and confused before but now I was petrified with fear. Taking me over three hours to find my way back to the path and in the direction of Jeffrey's mansion was a mission, so relieved in the end and so were the housemaids after I hadn't showed up for dinner, assuming I must've been out for one of my usual adventures. I went to bed strenuously exhausted that night and as I was falling asleep the phone rang, it was a call from Jeffrey who had been alerted of my disappearance. "What happened tonight, one of the maids called me to tell me you hadn't come back from your walk this evening" Detecting a tone of anger in his voice I tried to distract him by telling him of my findings and he scolded me for being gone for so long without anyone knowing where I was. Going back to the Indian remnants, I persisted on telling him what I had found. In the end he was just worried about me becoming a liability, but had to make it sound as if he cared. "Don't worry Jeffrey, I won't be doing that again. I can honestly say I have learned my lesson and the next time I want to explore I promise to take someone with me". I satisfied his worry of me being a future nuisance and with that I was finally able to tell him what I had discovered on my walk. He was impressed but did not sound surprised. "You must've been gone a long time if you found the old Indian pueblo's, just be careful you don't say anything about where you found the stuff on my property, it

could become a sight for historical preservation and that means the government could ultimately own my land."

I acknowledged his request and told them they were just a gift for my Mom, who was in love with Indians "Wait until she see's I brought her back real artifacts, she is going to totally freak out." He didn't mind that I was taking them. In fact he admired my curiosity and adventurous spirit. He reminded me that tomorrow was my last day. I would be driven to the Albuquerque International Airport the day after next, to meet Jeffrey in New York, for how long, only he knew. Giving Jeffrey many thanks for a great week, letting him know how much I appreciated these small breaks away, we then said goodnight. Hanging up the phone I had caught my second wind and set out to the kitchen to find a late-night snack. Raiding the fridge and pantry, I found some frozen pizzas and popcorn. I put on a movie and munched on the popcorn while the pizza cooked. Some 1980's dreadful alien flick got the better of me that night. It was based on a true story about people abductions from extraterrestrial beings, which were, like I was, visiting a remote area. I suddenly hated being alone on a ranch in the middle of nowhere. I munched down my burnt, crunchy pizza and became further enveloped in the thick plot. Leaving on the TV and the lights on that night, I spent my night tossing and turning, peeking through the small open crevices of the comforter, half expecting to see an alien being in my bedroom.

Living through the night was a relief and I laughed at myself in the morning, how spooked did I get? When I got to New York, Jeffrey, and Ghislane had a good laugh over my tale of survival in the wilderness and then the alien scare. "Your always having the best adventures" Ghislane exclaimed. We were similar in that way, both being a bit of free spirits it was really only her non-existence of moral standards that differentiated the two of us, in that way. "How do you know you weren't abducted and probed? I mean look at you and all that time alone on the ranch, what do you think Jeffrey, could she pass off as an alien?" Expectedly, Ghislane poked fun at me, her usual fun past time. Our relationship was an odd one, never threatened by each other but always precautionous towards one another nonetheless able to crack a joke together, but when it came time to "work" it was no fun and games, she was intensely serious. "With a sense of humor like yours I would tend to think that you are the one from another planet." Just friendly banter between the two of us, then Jeffrey had to jump in with his two bits, "I think you might be onto something Ghislane." I squinted my eyes and gave them both an exaggerated death stare and pretended to grab my stomach in pain, "I think some things trying to get out of me", putting my fist in my shirt to reenact a scene from Alien, I fell onto the couch and faked my death. "I knew it" Ghislane shouted and jumped on me to begin tickling me all over and we

all broke out into laughter. It was those fun times that made me feel like we were all apart of this really perplexed family. We did everything together similar to normal families like eat dinner, watch TV, and travel it was only the hedonistic and corrupt side to these two deviates that made them a peculiar pair.

Getting turned on at the two of us playing together, Jeffrey came over to the couch we were on and pulled down his sweatpants revealing his erect manhood. All of the laughter stopped, now it was time for work. Pushing my head into his pubic region I had to give into his perverted wants. Ghislane started to undress me. Once I was bare she loved starting with my breasts. She cupped them in her hands and brushed her fingers over my hardened nipples heading downwards pressing her lips deeply into my skin, I had to maneuver my body on the couch in a complex position to give them both what they wanted. And just like that, without even a moment's notice I could be put on the spot and have to amuse them in any way they wanted. A shameful way to make someone feel like a used toy, I wasn't around for companionship I was there for one thing, I was a compliant piece of eye candy.

Twenty minutes later and Jeffrey had erupted in pleasure. Ghislane sat up, still fully dressed, and wiped the sides of her mouth with her hands, giving a vindictive little chuckle, "That was fun." Jeffrey concurred with a sly grin arching his back for a stretch just looking able to utter the request "Why don't you come up with me upstairs for a steam bath and massage, I need to be loosened up after that?" It was more of a statement than a request, as if I had the choice to say "No thanks, I'm actually tired myself and would love to just relax" instead I would reply with my accustomed trained obedience, "No problem, when your ready lead the way." I had to get dressed again being that we were in Ghislane's downstairs office. Putting my clothes back on, Ghislane thought she had buttered him up just where she wanted him to ask for him to come have a look at her new townhouse renovations when he was finished with his massage. A very strange relationship those two have, there's a definite love flowing between them but not a passionate one, more like a respectful business, he gets what he wants...an uncountable number of girls and she gets what she wants, simple and sweet...an uncountable amount of money. The two things in life that can create such beautiful moments or the most horrendously terrible of them all, is sex and money.

Chapter 15

I joined him for a shower, steam bath and concluded his needs with a massage while listening to classical music. I knew he didn't want anything sexual from me now seeing he got what he already wanted downstairs, no this one was purely therapeutic. My favorite massages to give, making me feel like an actual real therapist. I lathered him in aromatic oils and let my hands discover the ways to unlock the stresses that his body held. After the massage was concluded we were going downstairs to get ready to go see Ghislane's townhouse as he had promised her earlier. He loved taking the hidden staircase while I hated it. I was so creeped out by his choice of décor, the blood red carpets, violent medieval paintings, and sculptures of the pagan god Pan, all of it representing the darker side of hedonism his lifestyle provoked. Spiraling down the hallway along with each step you took came with a pair of eyes that followed your every step. Brown, blue, green, hazel, all of the colors were there, staring at you the entire way down. As each step progressed, so would my anxiety to get out of there.

We found Ghislane where we had left her, in her office. She had just received an order in, a satellite camera with a twelve-inch flat screen. She told us how it was used to pick up any person in any location with the quick insert of an address. Quite a powerful new toy I thought, but it was only a minute display of what the rich could afford, what use they would get out of it was another concern. Soon after she was done figuring out the controls on the camera, we made a rare and first for me pit stop, the security room. What I thought was our way out by the front door was another hidden door. I was in shock as I was led into a room, so discreet that in three years I never even knew it existed. I kept my head down most of the time, knowing how secretive this must be being another door was an entire security base within his mansion. What I could see when I stole a glimpse here and there was an array of tiny screens, twenty odd or something. Small screens showing various rooms of the mansion I had recognized. The images were constantly changing so I found it hard to pinpoint an exact location but from the décor and short glimpses I suddenly knew from then on that my feelings of my every move being watched inside his corridors was now more than a possibility but was actually happening. Jeffrey spoke to an obese Spanish guy at the desk, whose job was to disgustingly overlook all of the video feedback. Kill two birds with one stone Jeffrey thought, free porn to share with all of his pedophile friends and when the occasion called for it, a security system all at one expense. Ever consumed with making money as well as saving it, I was again astonished at Jeffrey's capabilities. I didn't want to even think how deep the video infiltrated, pretending like I never saw anything at all I put the memory to the back of my mind and went on about my day. Stopping at Ghislane's new townhouse, another gift bought and paid

for by Jeffrey, he pointed out needed changes all over the place, driving the builders mad, as always. He wanted the place to scream out “GHISLANE” with a bold statement. Checkered floors and bold colors was the theme, like the queen of hearts from Alice in Wonderland, very well suited I thought.

The dust from the walls being torn down choked my throat and the elevator was not in use, the stairs were hardly either. The whole house was in bad shape then having to go up three flights of rickety steps was a bit of a risk too but worth it once you made it to her future walk in wardrobe or to us commoners, a closet the size of a small house. Complete with a dressing room, luxurious bathroom and plenty of storage for her every ensemble. Even without it being finished it was already a work of art, a sanctuary for any woman. She adorned herself in her future home, finally her own, relishing every inch of it, she already put in a work desk and spoke constantly of its ongoing renovations. About an hour later we were off to pick out curtains and look at some paint samples at a couple different boutique looking shops. Easily passing off as an ordinary couple for the day, they walked arm in arm strolling the streets of the Upper East Side. Except to me, still replaying the early afternoon’s events, shaking my head over the echoed images in my mind, I followed behind just waiting to be needed again.

Over the course of the next few months was a constant influx of exorbitant excursions at Jeffrey’s mansions, mainly to his island, to keep up with his ever-demanding sexual appetite with various young women and teenage girls. I got back on the Xanax, an old habit that I felt at the time would stop my memories from flowing back, rehabilitate my problems and relax me enough to deal with any situation at hand, no matter what the circumstance revealed itself to be. It was a drug that would blind my eyes to everything I should’ve been running from.

Having Brunel always in the picture these days wasn’t helping me at all either. Sending his girls for Jeffrey at all of his places now and at a vigorous flow, they had an abundance of girls at their disposal. If I were to count one girl for everyday of the week, it would be the underestimated statement of the century. So many girls between the two of them, some nights it would be a free for all frenzy for Jeffrey and Brunel, seven or so girls giving them their upmost attention, dotting on their every moan and whimper, Jeffrey being the main concern since Brunel worked for him and we were all aware of that too. If there were heaven on earth for men like Jeffrey, than he would be their God. Every one of his inner most desires was fulfilled when his harem of women was around. No wonder he didn’t travel much abroad these days, all he ever wanted was right at his doorstep. I couldn’t believe that he was still asking me to bring girls to him as well. There was never enough girls to

fill his appetite, so on occasion I would meet a pretty girl around my age and invite her back to his place to make some quick money by offering her a really good contact in the modeling and acting business. Keeping him satisfied and in need of me was a tiring job. With so much competition I had to be on the ball, seeming ambitious to grant him all of his desires. It was a lot of pressure and a spotlight of a role to undertake at such a young age but I told myself this is what my life’s training had led me up to be.

My Birthday was around the corner and turning eighteen had lost all of its sparkle and pizzazz. There were no more surprises in store for me, nothing that would bedazzle me I hadn’t done already. I spent my birthday on the island, having a quiet dinner and watching “Sex and the City” on the couch with Jeffrey, Ghislane and Emmy. There was no cake or a celebration of any sort but I did get a couple of presents that I opened outside underneath the main cabana. Jeffrey gave me a beautiful pair of sapphire and diamond encrusted earrings and Ghislane bought me another designer makeup case. I thanked the two of them with a tight squeeze and a gratuitous short spiel. As it went quiet, I looked out to the ocean and wondered if across these waters was there ever going to be happier days spent with someone special to me. Would he be kind, compassionate, and always be there when I needed him most? Or would I end up settling for my final bit of training, a marriage to a greedy old scrooge? Either way what I wanted most didn’t matter right now, I was still bound by Jeffrey’s hold over me and all I had to keep telling myself to get through this epic journey was, this is just the way it was for now.

Around the table for breakfast Jeffrey announced that he was expecting a few guests coming over with Brunel, no one of importance, just his usual entourage of beautiful girls. Russian models this time and Jeffrey was also having a photographer flown in to take modeling photos using the island as the perfect background for a sexy shoot. All of us girls were ushered onto rocks, hammocks, dug into sand and displayed just about anywhere they wanted. We were being photographed in next to nothing, like a netted fabric placed over us if the shot called for it, but the more provocative the more Jeffrey and Brunel loved it.

After the photo shoot we did some outdoor watersports. While us girls raced the jet skis around and jumped on the water trampoline, the men stayed on dry land to watch us from the beach. I was so used to this constant charade of girls and I didn’t mind having a bit of fun but this was different, I had to be more than just polite because I already knew it wouldn’t be long before we were all intimate with each other as well. Being the only girl that spoke English out of all of them was also a huge blunder. The only way we could communicate was through hand gestures

and body language, a very primitive form of speaking, but what choice did we have?

I did my best to get acquainted and as I had previously assumed after lunch on the beach we were again ushered into another part of the island, Jeffrey's cabana. There was no need for words here, as the girls already knew exactly what to do. Without saying anything they undressed me and began to ravage my body with their hands, tongues, lips and fingers. I was delirious, never having done anything like this before with so many girls. It was sheer chaos; I don't honestly know how men could fantasize over this. Through the glimpses in between bodies crossing over me I could see Jeffrey and Brunel watching us, sitting in a chair with their hands around their penises, stroking themselves together "The best part is they don't even speak English so there's never a need to have to keep them amused" I could hear one of the men divulge and pretty sure it came from Jeffrey laughing out loud to Brunel. I just closed my eyes and went somewhere else in my mind until it was all over. That was that, life went on and we all moved on to eat dinner together.

It couldn't be more awkward as Jeffrey and Brunel were beside themselves with their ego's beaming, and the girls chatted like busy little chipmunks with each other. Ghislane and Emmy on the other end of the table were being amused at the entire racquet around the table and then there was me. Sitting quietly and smiling in people's direction when needed, I was counting down the minutes until I could go lay down in my giant comfortable bed, slipping away to the gentle noises the island created and sink comfortably into a deep sleep with the assistance of my Xanax. Scratching at the plate in front of me with my fork out of boredom, I wasn't even hungry. I had lost my appetite for food. Rather sipping on the champagne I wanted to feel as far away from here as possible. What seemed like hours for everyone to finish their meals we were finally all saying goodnight and goodbye to each other, as Brunel was off early in the morning and taking the eight beauties with him. "Thank God" I told myself, once was more than I could handle of that in one day.

It didn't take me long to get back into my own comfort zone. Heading straight back to my cabana after dessert was served nearly tripping over my own two feet as I tried to scuttle off in a hurry. As soon as I entered my domain, I drew a breath and sighed a deep exhale outwards, finally alone and at peace... for now at least. Although the sun had set hours ago the high temperatures of the Caribbean were still an affliction, plaguing my cabana I was welcomed by a rush of warm air as I opened the door. I hit the switch to the fan and stripped down for a shower. Preparing my towel and toiletries I opened the back door to the outside shower and placed them on the floor. Whether I was cleaning up in the midst of a hot

day or retiring for the evening, an outside shower was always splendid. Under a thick dark cloak of the night sky only the moon and stars to shed enough light for me to see my way around. I could feel the soft breeze lick the droplets falling off of my bodies' curves in the reflection of the moonlight. It only encouraged me to stay longer under the warmth from the spray of rushing water. I let the hot water run out before I was sufficed enough to go back inside. Lounging around the bed in my panties and a tank top I was still sweltering from the heat. Trying to tire myself out, I did some reading and eventually fell asleep. I needed those times to unwind after such an ordeal, letting the Xanax wash away all of the pain I could then forgive the mistakes I had made, blaming myself for staying around for this I had wished I was never born at all. The pills would take all of that away for me. My heart was a tangled weave of deception and pain, only reassured by the lies that were told to me and the lies I would have to convince myself of.

Chapter 16

When we flew back into Palm Beach, Juan drove me back to my apartment. Lonely for some companionship I decided to call an old friend. I was longing to be important to someone and unfortunately with such little time to have a social life of my own I was compelled to call T.J. again. His Mom answered the phone and sounded quite surprised to hear my voice on the other end. She was always kind to me, I even used to bring her back "Cola" cans from other countries a bizarre hobby she loved collecting. She just didn't know what I saw in her son, even saying that to his face many times over. Not blind to his ways of cheating and stealing, being a personal victim of it, she made it apparent that she did not approve of T.J.'s choice in lifestyle. It used to really hurt him how his parents thought so badly of him, so he gave up trying to earn their love a long time ago. As long as he didn't steal from them anymore he was allowed to live there. Instead of that being a lesson to him, he would just try to be more clever in what he would steal, less obvious things. He would steal the toaster and sell it for five dollars if he knew it would help to get him his next high.

Nonetheless and at my expense I had a sweet spot for him. With enough water under the bridge, I was able to forget about the troubles he caused. His Mom told me she'd pass on the message when he got home, but that could be days from now. The last time he had been home was over a couple of weeks now. He only stopped by to get something to eat, have a long sleep and to beg her for a few bucks, supposedly to help him buy food. Then he was off again without a single word said, only leaving

his parents to their own assumptions, which were pretty much correct anyways.

I then called around a couple of mutual friends to see if anyone had heard from him. Everyone I spoke to pointed their fingers in the same direction and the worst place possible, Ritchie's house. One of his best friends told me of how bad he was doing, "He's not the same guy anymore, and all he cares about is the next high he gets. If we don't get anything for him he just loses it and goes off somewhere." It was hard to hear how badly affected my best friend was and a part of me secretly hoped they weren't right. Still defending him, I told everyone I had spoke too while trying to find him that T.J would be fine, he's just probably going through a bad phase, like we all do sometimes and needs people to have his back more than ever now. I was pretty much laughed at on the spot, most people that I considered my friends at the time were only friends by association. As long as we all looked the part, acted the part, and could handle the part, only then did they want to be around us. The last person I called was the last person I had hoped he wasn't with and it turned out that everyone was right.

He was with one of the biggest Coke dealers in our area, Ritchie-Rich, as everyone used to call him. He didn't look like a typical strung out junkie or dealer. Instead he looked like your average preppy college grad with aspiring propositions. He dressed well and acted like a nice guy to imminent clients only to get them hooked on his drugs and then turns them out onto the streets. He was a businessman and his business was thriving. He carried everything from most drugs to guns and knives. Having ears in all places made him a dangerous acquaintance. Using kids off the local Palm Beach streets to run his dirty errands and the errands of the others above him, he made his money by using these teenagers, who as hard as it was to believe was once somebodies sweet child.

I knew T.J didn't have the finances to support himself or his drug habit so the likelihood of him being indebted to Ritchie in other ways was a safe assumption. Obtaining Ritchie's number from one of T.J's friends Marcus he asked me, "What do you want to call Ritchie for? Come over to my place and I can get you whatever you want" Marcus was a sleaze bag who would tirelessly continue to try to appeal to my lesser sense of judgment, never getting the hint or just not caring that I could never and would never be interested in him. "No Thanks Marcus, can I just get the number please, it's very important that I get ahold of T.J, I'm really worried about him." I hated having to call this guy let alone have to ask him for something. "Is this about the Adam bullshit? Cause if it is you can let him know what a fucking bitch he is for not showing up to be there for him, you can tell him from me that it's his fault and it should've been him that's lying in the morgue now, not Adam" I was totally thrown

by his allegations I could only mutter out a whisper "Did you just say that Adam is dead, what happened?" "Oh snaps, I thought you knew, where have you been girl, under a rock or something?" Marcus was less than sensitive about his statements. "He got shot in the head by two black guys who got suspicious when their usual supplier didn't show up, your boy T.J was so fucked up he didn't even remember to turn up at Ritchie's for the delivery, so Ritchie sent Adam alone and now he's dead." Adam was a sweet kid who just happened to be born living on the wrong block. Best friends with T.J since childhood, the two were inseparable until puberty hit and even then they would chase girls together. Adam followed in T.J's every footstep, mimicking his shadow, if T.J jumped off the Eifel Tower then so would Adam so when T.J got hooked on drugs consequently Adam did too, leading ultimately to his death. Wanting to end the conversation with Marcus quickly I scribbled down the phone number on a blank piece of paper in front of me and hung up the phone to call Ritchie's place immediately.

"Yeah?" It was Ritchie whom bluntly answered the phone after the first ring. "Hi -Uh- Rich, It's Jenna, T.J's ex, we met a couple of times at a few parties" I was trying to remind him of who I was knowing how paranoid he was about people having his number. "Oh yeah, I know who you are, what is it you want?" He answered with a dry tone. "I was hoping you could tell me where I could find T.J, I've heard some stuff and am really worried about him, is he alright?" Ritchie snickered at my concerns. "What are you his Mom or something? He's fine, he should be back here around five o'clock, I'll tell him you called." In the middle of me saying "Thanks and good-bye" he hung up the phone, as there is no room for manners in his line of work. I waited until five o'clock watching the minutes on the clock tick past and when five o'clock came and passed by with still no phone call, I couldn't deny to myself that I wasn't stricken with distress. Falling asleep wasn't easy either. I ended up crashing out on my sofa watching T.V, half expecting to hear of another murder on the news and it being T.J.

Forgetting to put on my eye mask before I went to bed, I was woken up the next morning by rays of the sun beaming into my living room. When I sleep I am a creature of darkness, avoiding any window light at all costs. Staggering to the coffee pot not used to getting up this early, my first thought that day was T.J and why he hadn't called. A million thoughts rushed through my head like a steam train. ...is he ok? Is he not calling because he is still mad from our last breakup? Has he moved on to someone else? Is he in any trouble? Did Ritchie even pass on my message? The thoughts were an endless infliction, consuming my entire day.

Until finally he called my cell phone later in the afternoon, relief swept over me when I heard his voice on the other end. "Thank God you called, I have been so worried about you, are you alright?" I jumped in without letting him get past saying "Hello". "Yeah, I'm fine. Ritchie told me you called his house looking for me yesterday and gave me shit for it saying you were upset or something, what's up?" I knew I would have to be delicate about asking what happened to Adam, thinking he'd be a mess over it. "I heard from Marcus that something happened to Adam and I got worried about you, what is going on?" T.J sounded scared, for what reasons were beyond my knowledge but I was going to find out, he replied "I don't want to talk about it over the phone. Are you in town so we can meet up or something?" It was obvious I wanted him to know that I was more than willing to lend my shoulder for his problems. "I'm home now if you want to come over whenever you feel like it." He didn't hesitate in taking me up on the offer. "But I won't be able to get there until later, I'm downtown at Ritchie's place unless you want to come pick me up."

It was more of a request than a favor to myself which is what he was making it out to sound like, knowing him all too well I didn't make a fuss of his ill-contemplated attributes. I got the address off him and made my way into the ugliness of the not so dazzling parts of the Palm Beaches downtown area. Rolling up my windows and locking the doors to my truck I nervously drove through the rough streets trying to find Ritchie's apartment complex. Knowing all too well the history of the area, it's not a place a lone white girl in a nice truck wants to be seen, many reports of the locals rushing up to a vehicles with a weapon demanding money, cars, or just angry and out to hurt someone. I was speeding through the streets wanting to get out of there as quick as I could. A sad world we live in with so much hurt everywhere you look and nobody wanting to do anything about it, just accepting the hopelessness of never being able to achieve anything more than what our civilization has succumbed to. Being among one of those people, we were similar in so many ways. Only separated by our own personal fears and the different direction they pulled us into.

I drove straight through the open gates at the entrance to the complex and parked on the gutter in front of Ritchie's block of units. A crowd of people stood outside the blocks I was entering. Being hit on and offered drugs simultaneously my cheeks went flush and I put my head down not saying a word. Walking up the corridors of the staircase looked like a scene out of a horror flick. Graffiti covered the peeling of green paint on the walls and the pungent stench of something rotting, only to the worst of my imagination, filled my nostrils. I could hear babies screaming

through the thin walls and trying to find the unit number was difficult from the sporadic flickering of the fluorescent lights above me.

At last I found Ritchie's one, quite astonished with myself that I even made it this far. I had to knock loudly on the door a few times before a young girl answered the door with eyeliner bleeding down from her eyes, her jet black hair was strung out and a mess and she looked off her face on some hard drug. She had only her bra and a short skirt on to cover her private areas and a cigarette hung out of her mouth to complete the full picture of terrible state she was in. She looked me down with contempt and snubbed at me "What do you want?" I maintained my politeness and told her T.J was expecting me. She opened the door and walked away, leaving me by myself to venture through looking for T.J.

Passing through the kitchen it looked like a hospital lab with syringes on the counter tops and medicine containers lying around everywhere. Minding my steps through the dirty house, I walked to the back to the living room and found T.J in a K-Hole strung out on a filthy couch. "Hey...there" he acknowledged me with a giant smile spread across his face. He probably didn't even know who I was from the dreadful state he was in. My first look at him in months and I was in utter shock. My jaw must have dropped to the floor at the very sight of him. Never seeing him so skinny and unhealthy looking I took pity and wanted to help him before things got even worse and he ended up like Adam, dead.

"T.J, hey buddy its Jenna, remember I was coming to pick you up today. You don't look so good, what are you doing so messed up?" I don't think he could even understand what I was even saying because he could only reply by giggling and rolling over, patting the couch as if it were a fluffy animal. I stood over him now and raised my voice so he'd know I was serious and snap out of it a bit. "Get Up T.J, Now!" I ushered at him to get off the couch, repeating myself a few times over and with no response I knew I had to get physical. Rolling him back over to face me again I smacked his face hard and I'm sure it stung but I got the reaction I had wanted. He sat up and looked at me confused.

At least now he was able to focus on my words requesting him to come with me. He was getting up from the couch and stumbling around before falling down to the floor again. Putting his arm around my neck and carrying the majority of his weight, I helped him up many times over and down three flights of stairs into my truck and drove him back to my place. It was a triumph on it's own arriving downstairs in one piece. Being the only person who really cared if T.J lived or died I felt like the responsibility of helping him was my concern alone.

Thankfully Jeffrey was in Palm Beach for the next couple weeks entertaining royalty, which gave me a little time to try and clean T.J up. I called a few of his friends that I knew and asked them not to score any

drugs for him any more, pleading with them and telling all of them he was on the brink of death, reminding them of the friendship between us all that once existed before the drugs corrupted so many of us. Some of them laughed at me telling me I was wasting my time with T.J and others were nice enough to at least lie to my face politely and promise not to help him feed his addiction.

I just wanted to remedy all of his pain and problems but I felt so helpless fighting his battle against the streets. I bought some marijuana for him to smoke hoping to subside the withdrawals he was facing over the next few days but with no avail. The only thing that would help him was my Xanax, a few of those pills and he would go back to sleep, only waking up to get more of them. I would have to force him out of bed to have a shower once a day and make sure he ate something. He was more like a baby right now than he was a boyfriend, too much in need of something I couldn't give.

Chapter 17

When I went to see Jeffrey over the next course of days he picked out the dilemma I wore spread across my face straight away. "Your back with T.J aren't you" It was so funny that he knew me so well. "Yeah, he's in a real bad place in his life right now and needs my help." He looked astonished and replied, "You're a much better friend than I am, I know people like him and trust me they never change, no use in even trying" I believed him too knowing I was stupid for even attempting to change T.J, but my heart felt differently, he was still a human being and a good friend of mine just down at his worst. "That's what good friends are for" I laughed back at his remark, not wanting to take this conversation too much further. "I admire your loyalty at least, but take my word for it, he will hurt you again." His words were chilling but true, I had to find out for myself though.

Almost seeming like an actual friend for a second he ruined his brief momentary image by turning over from the unfinished massage that I was giving to him and acquired his sexual longings from my worn down soul. Not only did he know that I didn't want to endure any more demands tonight, but his energy enhanced from knowing it too. Looking up at him during the foreplay, it was an easy observation from the look in my eyes

that I hated every minute of it, seething through all of my duties until he climaxed.

Most days I could take this kind of treatment, it was only seldom I couldn't hold in the way Jeffrey disregarded my feelings. He had me just where he wanted me, like a pawn piece on a checkers board I was his own personal sex slave. For the remainder of the evening I stayed quiet, not sure of what to say after an episode like that. It was a vigorous display of how calumniating he could really be. He required me to clean up his spilled semen off of his genitals with a wet warm washcloth before he retired to his bedroom for a good night's sleep. Only a monstrous creep could sleep easy at night knowing what pain he caused others.

I went downstairs and asked Juan, who was still in the kitchen to pay me for the evening telling him that Jeffrey had gone to sleep for the night. It wasn't an unusual request. Juan would often have to fix up "the girls" after the sessions and sometimes even drive them home. He went to Jeffrey's desk and underneath was his duffel bag that always held insurmountable bundles of crisp hundred dollar bills. He took out two for me and handed them over. I thanked him and said goodnight, as I was always polite to Juan and his wife, Maria. His eyes were gentle and told me more than what he was allowed to say. I understood well. We all needed to eat and pay bills unfortunately even sometimes at our own moral expense.

Putting the keys into the ignition I started up the engine and reversed out of Jeffrey's driveway with promptness. I didn't want to be there a moment longer than I had to. Not much to look forward too getting back to my apartment either, I needed some time to filter my emotions. Parking my truck in front of a nearby beach I took my shoes off gradually stepping out of the door into the fog. I walked down to the edge of the sand where the water licked at my toes. My life was slipping away from me and I was really beginning to question the difference between living and dying. I was so tired of everything, my whole existence revolved around being everything to everyone, forgetting about being something for myself altogether. Pretending to be someone else became an attribute I was better than good at, probably much of why Jeffrey liked me in the first place. This time I held back my tears back and only let the anger fester into a deep pit in my stomach. My rage was aimed at the very people who abandoned me to fend for myself in the first place and accepted this life as normal for me, my parents.

When I got back to my apartment I was expecting to have to look after T.J, but to my surprise he had come around good that night. He greeted me at the door and asked how my evening was. "It was all fine" I easily lied. I never let anyone inside close enough to see my vulnerabilities. They were mine alone to battle. In my head they were too shameful to

talk about anyways. He wanted to talk about something else anyways. Sitting me down at the dining room table he began his spiel. "I know you don't think much of me anymore, how could you? I'm a junkie who steals and sells drugs for a living, but I promise that's all going to change now. Adam is dead because of me and the only way I can make it up to him is to get away from it all. I promise things are going to get better." It was a convincing talk, but I knew him all too well. His demon inside yearned for him to fail but who was I to second-guess him out loud, I could only try to give him hope. "No one is perfect T.J. At least you're trying now and that's all that matters to me. I am so proud of you." I gave him a sincere hug and kissed him for the first time in a long time. "I love you," he said to me and I returned my love back. We slept in the same bed together that night and were officially back on together.

Two days later I was gone again, beckoned to be in Santa Fe. Ghislane only told me that I was to meet someone there, not sure of whom that was. It wasn't my place to ask questions. As far as I knew it could be anyone and I had no choice but to be compliant to their needs. It was the middle of the day when I arrived at the airport. One of the ranch hands came to pick me up in a big work truck that smelled like dirt and sweat but I didn't mind that's what I loved about the countryside.

When we arrived at the mansion my guest was already there waiting for me. I couldn't wipe the look off my face as he turned around from the bookshelf that he was standing at. "Hello" that same old cheesy grin greeted me once again. It was his highness Prince Andrew, and what a sight. He wrapped his arms around my waist and greeted me like an old friend. I hugged him back rolling my eyes at the same time, already dreading what lay in store over the next couple of days. My job was to entertain him endlessly, whether that meant having to bestow him my body during an erotic massage or simply take him horseback riding. For the next couple of days he was to be my only concern, but he wasn't. I called in checking on T.J a few times a day, not wanting to be a nag but just hoping he hadn't had any thoughts about relapsing. He was doing great, even applying for a couple jobs. Being reassured by him made my time away less complicated and thankfully with the help of my ever-ready Xanax I was able to cope with the ordeal.

The mansion was completely empty save a couple of maids who also cooked our dinners for us, and a couple bodyguards that we hardly even saw at all. The time dragged by slowly for me as I was counting down the hours until I flew away again, anywhere but here I thought. It wasn't easy meeting the sexual desires of these strange men, the Prince being one of them. He loved my feet and even licked in between my toes. Then there was the lack of passion in the intimacy we shared, to him I was just another girl and to me he was just another job. Not the right reasons to be

together but I thought in this world and to these monsters, there didn't need to be a reason. To them it's nothing but a reenactment of their personal fantasies. To me it was a living nightmare.

Thankfully one of Jeffrey's assistants from New York called me on my cell phone early in the morning on the second day to fill me in on my next adventure. I had a flight booked for me to leave that afternoon to arrive at La Guardia airport in the evening. Even though I had to go back to yet another controlling man, I was still relieved. At least I was used to the confinements of Jeffrey's control and in some twisted way he was more comforting than these strangers he sent me to. Overlooking the city of New York as the plane landed felt like I was flying from one cage to another. Entrapped by falling victim to the predators that lured me into their enclosure. I didn't know how I would ever get out again. That deep pit in my stomach began to churn again, a physical reaction to the anxiety I was plagued with. Before getting off the plane I touched up my make-up to hide any signs of the frailty I was feeling.

Jo-Jo met me at the arrival terminal and picked up my luggage for me. He never said much at all, nodding to any reciprocating conversation. I don't think he could really speak that good of English anyways. It was better for me as I preferred the quietness for the moment. He opened the back door for me and we headed off for my next prison cell. When we got to Jeffrey's mansion on 72nd, the place looked empty. I walked up the staircase to Jeffrey's office and he wasn't there. Feeling a bit hungry I walked back down to where the kitchen was. I opened the fridge and found some leftovers that Adam, Jeffrey's chef, had cooked. I loved his cooking, when it wasn't filled with beansprouts and tofu. He used to make me the best pizza upon request, or whenever he was cooking seafood, which he knew I hated. He had an honest appeal about him and never even took notice when on many occasions us girls would be prancing around topless, sometimes even stark naked around the pool or beach. He would have to serve us our meals and would do it with such a casual professionalism, never making anyone uneasy at any occasion.

Half way through my meal the kitchen doors swung open and incoming was Jeffrey and Ghislane. Choking down my bite of food down, I got up from my seat and kissed them both on the cheeks. "Hi guys, how are you?" I greeted them and Ghislane answered for them both "Good, good. Sit down and finish your meal, don't let us interrupt you." I hated eating alone in front of people, chewing food and maintaining a conversation at the same time didn't give off the best look. "I was just finishing anyways, can I get you guys anything, maybe a tea or something?" Always playing my part, another reason to keep me around I guess, I went beyond the call of duty and after the last period with them, I had been reminded of my place. "Yes, I'll take a one" Ghislane stated. "Jeffrey how about you,

anything I can get for you?" I asked again and he answered, "No thanks, we just ate and I'm still full" and they sat down together on the stools at the kitchen bench.

I got out the shiny red kettle from the cupboard, knowing my way all too well around the kitchen and put it over the hot stove plate. Turning around to face them, I thought they were acting peculiar. "So..." Ghislane started the conversation, "How was the ranch with the Prince?" It was a natural reaction for me to blush, knowing exactly what she was referring to. Keeping busy preparing her cup of tea and avoiding eye contact with both of them I started to unpack the counter where I had been eating, "I think he had a really good time, he seemed relaxed during the trip and when we said good-bye to each other he gave me a kiss." I went on to tell them what we did together "I took him horseback riding, nowhere to far just around the property, um... we went swimming in the pool, and of course I gave him plenty of massages. He had a massage at least couple times each day really seeming to enjoy his time there." It's what they wanted to hear, not the truth of how disgusting I had felt over the whole thing but they already knew the truth anyways, it's what they had trained me for in the first place.

Like two proud parents they both looked over me with such content. "Good, you did really well" Jeffrey complimented me. Turning around to the boiling kettle, I finished Ghislane's tea for her and the conversation led on to other subjects. We all ventured up to Jeffrey's office and out came the infamous duffle bag that went wherever he did. I was given close to a thousand dollars for my time in Santa Fe, more than what I thought anybody at my young age could make for a couple days of work. It was fulfilling the obscene vulgar needs of the so-called privileged that earned me so much.

Chapter 18

I spent the next few days in New York, venturing out to do some shopping therapy. I loved the eccentric parts of the city. Every street was different but the same energetic vibe filled all of them, animated with all different walks of life. Hanging out at coffee shops reading the newspaper or a good book was a favorite pastime while in the big apple. Being close enough to get back to Jeffrey for when he needed me but also far enough to get away from all of it. Most of the day slipped by without being missed and I made my way back to Jeffrey's.

Making one last pit stop, I walked into an old bookshop to browse at their assortment of old titles. I wasn't in any hurry so I took my time

reading the backs of interesting looking books. I bumped into a girl looking down the same aisle I was down. "Sorry, I'm so clumsy" she was apologizing for my mistake. "No, no, it was my fault, I wasn't looking at where I was going. I get so wrapped up with my nose in a book and trip over my own two feet if I'm not careful enough." We were both giggling now and I further introduced myself to her. Her name was Valerie or Vickie or something like that, anyways she was a student at a school for hairdressing nearby. Chatting away both young and similar interests in each other's choice of reading we found it easy to speak with one another. She wasn't from around here only being in the city for the last two months, her parents hated her being here, but were also supportive in her big decision to move from the countryside in hopes of her accomplishing her own dreams. Aside from not having her near them, they just wanted her to be happy and supported in her big decision to move to the city, helping her pay some of the way.

She was a pretty girl with cherry red hair and soft white skin. Her long legs were emphasized by the short flowery dress that complimented her hourglass figure. She would definitely fit the pro quo for going down in one of Jeffrey's little black books. Only imagining the look on his face upon meeting her I could already see his sly grin spread from ear to ear. Knowing exactly what he would do with her and the very thought of him tarnishing a sweet country girl such as her just couldn't be done. It was the beginning of a turning point in my life that started with realizing I had a choice at hand and the effect I could have on one person alone. "I must be off, but it was really nice to meet you." Bidding her goodnight and paying for my books I turned around with one last glance over my shoulder and said. "Good luck in the city!" Leaving that bookshop was a small step in a growing abundance of larger strides to come. Turning the corner onto 72nd street I had an undeniable feeling in the pit of my stomach again but this time it wasn't the familiar hurl of anxiety I was used to after I had done something I had wrong that I had regretted, it was a new feeling of pride and inner strength. I quite liked it a lot, I held my head high and smiled on the inside when Jeffrey asked me how my day was and what I got up to, not mentioning I had let one girl slip on bye.

The icy winter winds faded away making way for the approaching sunny days that blossomed the colorful shades of spring. This was my favorite time of the year. Making the most use of his island we spent countless days of the increasingly hot days there. A constant array of visiting guests and plentiful young women to flock around keeping them entertained was the typical lazy afternoon on Little St. Jeff's. We ate, drank, and played under the blue blanket of cloudless skies. To many this lifestyle could seem idyllic, unless you were like me, the one on the other

side of the fence where the grass wasn't so green. Fortunately for me and in some ways not, I was mostly expected to attend to only Jeffrey's insurmountable of sexual desires. Whereas the other girls who came one day and went the next were promised a multitude of open doors just for there meager participation in sexual acts with random men, only to be disappointed when they realized they were nothing more than a single night out for these geriatric senior citizens who most likely due Alzheimer's would sooner forget the entire experience let alone their first name.

Surrounded by those in our world who many looked up too but not seeing them from where I was standing, I didn't have the highest of standards in humanity. Then I met Al Gore and his lovely wife during one of those many weekends away in the Caribbean. I was blown away by the amount of attention Al doted on his wife, it was so sweet to watch. They sat next to each other at the dinner table gazing into one another's eyes having an intimate conversation between them. Among the many guests visiting that night and many of them young beautiful women, not once did Al's eye's stray elsewhere, to them they were the only ones there. He was up for a presidential election that year and he definitely had my vote. Anyone that could show that much devotion and passion towards his loved ones could have the same devotion towards running a country, or at least I thought so. He only left his wife's side to have a walk down to the beach with the host of the weekend, Jeffrey. The weather was still warm in the evening when I decided to break away from the idle chat around the table and take a stroll too.

Not wanting to interrupt the conversation between Jeffrey and Al, I walked in the opposite direction plucking the washed up sea shells imbedded in the sand along the way. I enjoyed the serenity in the solitude of the island. So many nooks and crannies to get lost in, I could imagine that I actually disappeared from the entire world for a moment. By the time I came back to the main house majority of the small crowd had been long gone retired to their cabanas. Even Jeffrey had gone off to bed but trust party animal Ghislane to still be up entertaining the remaining guests left at the table, regaling her wild stories of people and places she has embarked on. Trying not to make eye contact as I walked past them on my way back to my cabana carrying my seashells inside my curled up blouse, I wasn't up for anymore pointless talking tonight. Emptying out my seashells into a plastic bag, I went over my new treasures one by one. I loved collecting odd things, shells being one of my favorites.

Ghislane and I shared that interest together. We would enjoy walk abouts around the island searching for lost pieces of the remnants that pirate's had left behind centuries ago. It was mostly broken plates or smashed glass from bottles of ale, and even occasionally getting lucky

enough to find some old coins here and there. It wasn't easy though, both loving a challenge it was perfect for us. Enduring many scratches from the bushes we would be searching through and then the soar arms from digging all day, but it was worth it in the end. After nearly two years of collecting items and saving them, we made Jeffrey a mosaic table out of the remaining pieces left from the era of the pirate's day. Upon completing it we were both astounded in our creation, it was such an item of rarity and an interesting piece of work. When we presented it to Jeffrey he was even impressed not only in our amazing finds but what we did with them. The table became an important work of art that Jeffrey showed off inside the main house's lounge room, sparking a much intrigue and table conversation by many of the visiting guests to his island.

The next morning was good-bye for most of the visitors, leaving just the usual behind. Soaking in the sun and living it up in the lap of luxury is how the next few weeks were spent before having to get back to the dredge of the city. Sometimes we'd have to go to St. Johns island for Jeffrey to do some work in the office. It was so boring for me to sit in their listening to him on the phone or coming down on some poor employee for something stupid like not answering the phone correctly. If I knew he was going to be awhile I would excuse myself for a bit of shopping. Not that the Caribbean had much to offer in the world of fashion but there was never an amount of bikinis one girl could own and I loved all the little knick knacks one could find there. Flying back on a private jet was the best part because I could transport just about anything I wanted back to my apartment, which was already filled with an assortment from my shopping ventures and collection of seashells from the Caribbean.

The next big dinner party on the island had another significant guest appearance being, the one and only, Bill Clinton. He is the only president in the world to be dismissed from his role as a world leader because he was caught with his trousers around his ankles and had the stain to prove it. Publicly humiliating his wife and himself he retired from his title but not from his lifestyle. This wasn't a big party as such, only a few of us eating at the diner table. There was Jeffrey at the head of it all, as always. On the left side was Emmy, Ghislane and I. Sitting across the table from us was Bill with two lovely girls who were visiting from New York. Bill's wife, Hillary's absence from the night made it easy for his apparent provocative cheeky side to come out. Teasing the girls on either side of him with playful pokes and brassy comments, there was no modesty between any of them. We all finished our meals and scattered in our own different directions.

Jeffrey wanted his evening massage before bed and Ghislane and Emmy went to their office to talk about something, leaving our guest of honor to find company elsewhere. Strolling into the darkness with two beautiful girls around either arm, Bill seemed content to retire for the evening. He wanted to have a hot bath before bed while I began the massage in the tub. Starting with his feet and calves, he wanted to end the night quickly. Never showing any restraint he sat up on the edge of the tub and asked me to preform on him orally. I did my job, but that's all our relationship was these days, a dreadful job. Getting it over and done with as quick as possible was my hope but I couldn't let him pick up on those vibes, to make him enticed I had to act like his little porn star, knowing exactly how he wanted it. Only then would my duties be fulfilled and I would be able to get back the reality of my complicated life. Before I could say goodnight, Jeffrey had one more request. He wanted me to tuck him under the blankets and fluff his pillows for him. Then I had to reach under the covers and massage his feet while watching him fall asleep, he even wanted me to wait like twenty minutes or so after he fell asleep before I could leave. It wasn't unusual for him to ask it but God I hated it, never offering it I would always wait for him to request it. Once he was snoring gently I wiped my hands clean of the lotion and quietly closed the doors to his room. Making my way up the outdoor spiraling staircase, I felt the breeze blow through my hair and looked up to the heavens. The stars shown so bright out here in the middle of nowhere with no big city lights to hinder their effect I could get lost in time staring into them. No matter how far gone I really felt there was always something about a simple caress from the wind or the reflection of the star sweeping sky in the black glossy ocean that would always remind me of my fond love of nature's blessings.

Back in New York, there was nothing left of nature to adorn. It was a dwelling for those who no longer saw the use for trees without cages or blue skies without clouds of man made fumes and gases. Unfortunately if we weren't in the Caribbean, we were there in New York. Hardly going back to Palm Beach, barely even seeing my family, my dog or T.J these days at all. In my parents heads I was all grown up and educated in the world of wealth not needing them any longer they would just wait for my call once in a while to let them know how I was doing and that was the extent to our restricted relationship. The road my life has led down never has kept me close to home anyways so to me it wasn't anything unordinary but still a sad existence to be without a family of my own. It would've been nice to be missed though, rarely letting myself think like that. No room for pity in my heart, if I did, the floodgates could open and I'd have enough grief in one lifetime to go around a few times that they would've never been closed.

Jeffrey's business was running well from the looks of his attentiveness the office he owned in the Upper East Side of Manhattan. Alan Dershowitz, his colleague in finances and personal solicitor, a bird of the same feather, I had seen hanging around the island and Jeffrey's Manhattan mansion, more and more these days. Alan's taste for the young and beautiful was a bias for a blooming business relationship between him and Jeffrey. After an explicit session of Jeffrey's vulgar pilgrimage into my body, we were interrupted by a knock at the door by Jeffrey's good friend, Alan. I wrapped myself up in Jeffrey's pink bed sheets, which is the color preference he chose to sleep in because it reminded him of the same color of his own words "Pussy", and covered my face from the unexpected intrusion. Jeffrey got up and wrapped a towel around his loins and answered the door completely calm. Opening the bedroom door and letting Alan inside they began to converse about business immediately, right in front of me. Jeffrey started to tell Alan what needed to be done while he jostled some notes down quickly. I peeked my head from underneath the covers thinking they were too wrapped up in their work to notice me get up and dressed, and Jeffrey turned back to me and told me to just stay there this would only take a second. Going back to Alan he turned his focus back into work and hustled out a few more orders before letting Alan out of the door and returning his attention to me.

"Sorry about that, work never stops and neither will the money coming in. How else am I going to make a million dollars while I'm sleeping?" Jeffrey chuckled as he sat back down on the bed next to me. I laughed at his humorous and mostly true statement, then a strand of hair fell in front of my face. Before I could get to it he put it back behind my ears and sweetly stroked my face, for a moment we just looked into each other's eyes and he nearly seemed almost human to me. It was bizarre how he could be so kind and gentle one moment and the second beforehand I was being treated like no more than a common plaything left out for display. Nothing more than an ego trip, Jeffrey got off on letting the ones he wanted to know that he could own anything and anyone he wanted in this world. Maybe for a brief minute I believed the sincerity behind his eyes but that vision would quickly fade away and I would be left second-guessing why I even fell for his deceitful tricks for a moment.

Jeffrey got up from the bed and asked me to join him for a shower. In his bedroom, which was the entire top floor, he had a glass shower enclosed underneath a glass skylight right in the middle of the room. It was perfectly accessible feature for a man that loved both being clean and nude, but still an odd feature at that. As I always did whenever I showered with him, I lathered a loofa with soapsuds and would scrub his body, up and down, in between his toes, even behind his ears and of

course his genitals area. The sunlight shown through the glass ceilings into where we were standing, making the moment feel even more surreal on top of the already popped Xanax I had popped before for breakfast earlier that morning. Jeffrey was in such a lighthearted mood that day, making funny cracks at me, and acting like a flirt. When I was finished washing him he actually wanted to wash me too, which was another totally out of his character suggestion.

For the rest of the day, he took me everywhere with him, the office and then to a friends place, even just wanting to hang out with me for a while. I wasn't used to being treated like anything more than a dog on a leash, when he acted like this it just completely spun me around confusing me even more.

We were spending heaps of time together these days, a lot more than usual. At the ranch we would do things together, alone, and not just the usual perverted things I was accustomed to doing with him alone. Horseback riding on his ranch during weekends away by ourselves and movie nights snuggling up over a bucket of popcorn instead of having to massage his feet during the entire film became his way to alter my perception of my original notion that I wasn't just his sex slave, I thought I was finally becoming his friend.

When we went quad biking he no longer wanted me to take my own bike, he preferred me to sit on the back of his, holding onto him tightly and he even tried to teach me how to drive a manual stick shift car. He was definitely trying to show a softer side of himself, different to the stone cold slave driver I had to come to respect out of fear over the many years. Still a hard image to change after all I had been through and seen over the years I had been with him. Nonetheless he was still my "boss" so I humored his attempts and matched his caring demeanor, giving him the impression I was intrigued in our new kind of affair.

Chapter 19

His attentiveness led into the warmer months that commenced the beginning of long summer days that I looked forward too. I couldn't help but enjoy his eagerness to see me more relaxed these days. He wasn't even bothering me to find alternate sources of girls for his twisted satisfaction anymore and although I was still being used for his distorted sexual enjoyments he further seduced me into believing I meant a lot more to him than I ever did.

It all came to a sudden conclusion one sunny afternoon in the Caribbean. Jeffrey pulled himself up to the ladders first step and climbed up the next four steps to the top of the dock. His chest was heaving rapidly as he sat down catching his breath. Ghislane was the next one up and then I followed lastly behind them. To me it was an invigorating snorkel around the shallow reefs within the radius of the dock, but to Jeffrey the half an hour swim in the ocean was enough to overexert his ageing limbs. I took off my snorkel gear and placed it in the storage bench, grabbing us a few towels at the same time. Wrapping a towel around Jeffrey's backside and handing one to Ghislane, I sat down next to them on the dock and we laughed how fatigued Jeffrey was, poking fun that he really is getting older. A very touchy subject for the vain at heart but he didn't seem to mind it, probably knowing we'd never take the joke too far. We sat there in silence for a moment, an odd silence at that. Jeffrey looked at Ghislane and then Ghislane looked at me, placing me once again in the spotlight. They both scooted closer to where I was sitting and I felt something stirring in the air. The biggest turning point of events in all of my time spent with them.

Jeffrey sat next to me and put his hand on my back and looked at me with a certain kind of sincerity I hadn't seen in him before. "I want to first of all tell you that over the last few years you have shown me the kind of devotion and loyalty that I believe is rare to find among people these days, qualities I hold that high in regard." Bewildered by the whole scenario I just nodded every time he paused, trying to grasp what his intentions were getting at. He continued to praise my nature saying "I hope you know my appreciation for your embracing of my lifestyle, you have been achieving a name for yourself among the friends I have introduced you to. Everybody says basically the same thing about you, the same thing I believe. You are a delightfully funny girl who has developed into a mature graceful young woman and I could think of nobody else I'd rather have a child than with than you."

And just like that he created a whole new dilemma for me to face. In utter shock from the completely unexpected proposition and before I could even think of anything to respond with, Ghislane made the finishing touches with the business end of the deal starting with the pros before the cons "You would have around the clock nannies to help you. Jeffrey would pay for a mansion of your choice in either Palm Beach or New York" and as if the drumrolls were beckoning "and... you would have a hefty monthly allowance from Jeffrey's bank account" Astonished at their first offers I nearly took the bait. Then she continued to finish the terms of our pre-agreement with "But you would have to travel with the child where and when Jeffrey wanted you to be, and most importantly you would have to sign a contract stating that Jeffrey and you are not

monogamous and that the child would belong in Jeffrey's custody in the event of a falling out between the two of you." She kind of threw that last one in there quickly, as if she could get away with me not hearing that I would basically have to relinquish the rights to my own flesh in blood and surrender them to a life of servitude and abuse with these people. My maternal alarm bells went off straight away and I already knew my answer. No way I could I do that to any poor baby, God only knew what these monsters had in store for me let alone a baby, but it was an instant reaction that saved me. "I don't know guy's, I mean I'm really young and never really even thought about having kids yet. Wow, I just don't know." I slicked my hand through my hair nervously and took in a silent breath. I had to go beyond what I was truly feeling and give them the feeling that I'd never let them down. Putting an eager smile on my face and sucking up my gut's intuition I told them "You know what, let me get my certificates in massage and have some time to prepare for this and get healthy then next year we'll all think about having a baby together." It was crazy to even hear me say out loud but from the expressions on their faces I had fulfilled their wishes.

Much reason to celebrate that night they were both in a cheery mood around the dinner table. Except for me who had taken double the dosage of Xanax to even cope with the high amounts of anxiety I had been suffering from since we got back from the dock. I wasn't sipping the champagne that night, I was gulping it and when their moods turned from cheery to raunchy later that evening it wasn't hard for me to comply. From the full effects of the state I was in I would've agreed to just about anything, allowing them to treat themselves to ravishing the tender parts of my body.

Over the next few weeks everything went on as it normally would, and not another mention of their proposal. My birthday was only a week away and I was turning nineteen that year. All I wanted was to get my certificates before I got any older and get trapped into this life for good. When my big day rolled around I was in New York with Jeffrey and Ghislane. Sitting on my bed listening to MTV's channel blare in the background of my room I was painting my toenails when I was suddenly buzzed on the intercom. It was Jeffrey calling himself to ask me to meet him in his office in ten minutes. Perfect timing to let my nails dry I thought to myself. Already contemplating his desire to come downstairs I knew it had something to do with my birthday present but I was more expecting the usual shopping money or piece of jewelry, definitely not what he had in store for me.

I knocked on the slightly ajar door to Jeffrey's office and heard him beckon me inside. "Hello, what cha up too?" I asked in a cutesy tone of voice. Walking over to his desk he looked up at me taking his reading

glasses off while granting me a big smile. "Come over here and sit down with me" as he ushered me to come sit on his lap. Pulling me onto him he had a funny look on his face, like he had something really big to tell me and was letting the anticipation build in the thickness of the silence. "What???" I laughed at the way he was looking at me now. "First of all... Happy birthday today." Was only the beginning of his announcement and he proceeded to tell me "I know how much you have wanted this for so long and you are more than deserving of it. You are going away to Thailand to learn authentic Thai Massage and within eight weeks you'll receive a certificate for being a qualified Thai Massage Therapist." Astonished at his attempts to see me get what I wanted, not exactly the type of massage I was interested in but it was a start and a first certificate for me to acquire. My eyes lit up and I threw my arms around his neck, planting a big kiss on his lips, which I rarely ever did.

"Wow, I don't know what to say, this is beyond my wildest dreams... thank you so much!" I did well to let him know I appreciated his grandeur offer. He went on to give me the details of where I'd be staying, the school's schedules, and how much he loved Thai massage, apparently it was the next big thing to hit the shores of America. He had planned out an entire itinerary for me. I was to depart at the end of August and he had already enrolled me in a class at "ITM Massage School". I would only have a few days to settle in before I would be attending classes five days a week over eight hours a day. He even had an assignment for me to do while I was over there. I was to meet up with a girl who was also being put up at the "Princess Hotel" where I was staying. She had an Asian sounding name so I just assumed she was a local girl hoping for an opportunity of a lifetime, if she only knew what she would be getting herself into. If I decided that she met Jeffrey's particular quota of approval then she would be sent over to the U.S to meet with him or one of his esteemed colleagues. Besides the guilt of having to decide a stranger's uncertain fate, everything else sounded more than wonderful. Eight weeks gone from Jeffrey sounded like a lifetime away and I couldn't be more excited at this chance. It was the opportunity of my lifetime and I wasn't going to waste a second of it.

Ghislane came in a few minutes later and the look on her face told me she already knew. I got up from Jeffrey's lap and gave her a big hug and told her, "This is so nice of you guys, Thank you so much!" She didn't share my enthusiasm of excitement. In a dull tone she responded, "I didn't have a thing to do with it, it was all Jeffrey's idea but good-luck anyways." She gave me her best impression of being human for a brief second and hugged me back. It was just her way and I had come to accept it. Depending on the level of slander her insults provoked was just her way of telling you she cares without really ever showing it. Probably

doesn't make sense to most sane people but after all of the time spent with them, I had gotten to understand a few of their quirky ways. Even if I didn't agree with them, they knew I would for their sake of opinion. What did it matter anyways I thought, I had been degraded in every other physical way what's the difference from taking their mental abuse too. Not the exact choice of employers I would've chosen over again if given the opportunity but here I was and doing my very best to excel at their demands.

I was sent home for a little over a week to pack for the long trip and make the rounds visiting my family before I left overseas on my first trip all by myself. It was great to see my family after such a long time away. My older brother and his wife even came down to visit for the well wishing of my departure. Everyone in my family seemed stoked at the prospects my long journey had led me down. Here I was jet setting around the world in my teens and getting paid to study the course of my dreams at a cost that I only knew I would have to pay. It was a wonderful get together with all of them around, a great way to remember them. If I'd only known it would be the last time I would see any of them I would've emphasized to my brothers how much I really loved them both and how much I would miss them in the decade to come! But I didn't know what my future held for me, I had nothing planned out I was just hoping for the right opportunities.

I also had a few good friends to catch up with before I went. Every night was another party and by the end of the week I had drunken enough to drown an Irishman on St. Patty's Day. I was given the lists to all of my friends email address and told to keep in touch. Yeah right I thought, I was going to be too busy having too much fun to be thinking about sitting on a computer emailing people, but I told them I would anyways. Save myself the point of having to explain that in many different ways to a group of already tipsy slurring teenagers. Out of everyone who was really happy for me, T.J wasn't. He hated the idea of me leaving him to have a non-stop party in Thailand without him. He was just starting to seem like he was coming good and I didn't like having to leave him at such a vulnerable state but in my young years I had already realized I needed to do some things for myself and this was one of them. There was still a huge amount of broken trust between us, trust that could probably never be rendered again so I thought I was being decent enough letting him stay at my apartment while I was gone, but he was not to drive my truck, at all. I paid too much money on insurance for that thing and knowing his driving record I didn't want the risk of something happening while I was gone for so long. He didn't agree with me at all, throwing a grown up tantrum all over my apartment. Hitting the walls and doors, shouting the entire complex down, there was nothing I could say or do at this point in

time so I just put my dog on the lead and took her for a walk to calm down the situation and give me some time to be alone. Mary Jane was the only one I hated leaving behind. When we got back from the long walk she barricaded my suitcase while I was packing the horrendous amount of clothing that I always did. I was promising her I wouldn't be long and told her how much I loved her giving her a big hug. I choked back on the tears that were swelling up in my eyes, it was like she already knew the night before I flew out to New York that this would be my final trip.

There was a commercial flight booked for me in the morning and I needed the rest that night to fully recover from my binge of celebration drinking. T.J crept into bed later that night and tried to redeem his behavior with sweet nothings and dry humping my backside. It did nothing for me sexually. I didn't feel like that for him any longer and the sooner he realized that, the better he'd be off. I told him I wasn't up for it and he picked up a pillow and slammed the door behind him. It didn't matter I told myself, the next day I was off and wouldn't have to deal with him or anyone.

T.J caught a cab with me to MIA, the airport in Miami. He walked with me to the furthest point he was allowed to go by the security gates and as we stood in line together it was almost heartbreaking seeing him cry. I told him I'd try to call him everyday, attempting to give him optimistic ways to look at this time away from each other. In the end he had me crying and I had to give into my remaining feelings I had for him. One last kiss under the x-ray bridge and he vanished out of my sight as I furthered down the terminals long hall.

Chapter 20

It was only a short flight to New York and I just couldn't wait until next week when I'd be jetting of to an exotic destination all by my lonesome self. It was all I could think about talk about and dream about, finally my break. Ghislane did what she did best that week and prepped me for everything I could imagine under the sun. Do's and Don'ts, emergency numbers and western union locations were among some things on the list she gave me. Like I said, she showed her caring side in other ways. There was also the name of the girl I was supposed to be meeting, the room she was in and what dates she would be staying there.

When I got out of Ghislane's office I was instructed to meet Jeffrey in his office. She had to stay back for some paper work that she had to catch up on pronto. Making my way up the red and gold trimmed carpeted

staircase I prepared myself for some major sucking up before I left, he would be expecting it for his recent generosity, or so I had thought. Opening those familiar heavy doors the first thing I saw was an unfamiliar face standing over Jeffrey's shoulder.

She was a tall girl with blonde hair twisted up in a professional looking knot. Her big smile was flashing at him with hints of her cheekiness to come and she was dressed to kill with a short tight grey skirt and a matching suit jacket over her white buttoned down blouse, revealing her voluptuous ample cleavage. She looked like the old college professor's wet dream. When she introduced herself to me, a thick Czech accent presented itself. Her name was Nadia Marcinkova and Jeffrey looked just about as smitten as a victim of a love struck arrow from no one but the cupids themselves. Jeffrey further introduced her as his new assistant and masseuse while I would be away, barely taking his eyes off her for one second. It was a bit of a blow to take, being so easily replaced but also a part of me already knew this was expected off someone like him. Good for him I thought to myself, why should I have bitterness over someone I never had intimate feelings for and knew had never really cared for me in the first place. Kissing her on the cheeks and telling her my name, I was doing my best to grin and bear it. We hugged for a brief show of uniformity but it was just that, a show for Jeffrey to see. When he was away for the moment or she wasn't busy hanging off his every word, the way we all started out, she would snub me off to only head off in another direction. A real bitch if anyone was to ask me but no one would anyways it wasn't my job to like her.

Over the next course of days it was my task to show her some of my techniques in massaging Jeffrey and the erotic side of finishing it off. Nadia despised me even more when Jeffrey told her to follow my lead during the massage as she tried to take over and do her own thing a few times. To me it was quite funny her competitive side, I had nothing more to prove so watching her put on an act of seduction and scream out her every body function during a faked orgasm was nothing but entertaining in my eyes. After a few sessions together it was my time to be off on another adventure far, far away from here or from the chains that I wore for way too long. Jeffrey had someone else to fit the chains that kept me so close to him. Even though she wasn't the nicest of girls I still couldn't help but feel sorry for her. No girl should belong to someone out of servitude, but unfortunately it is the way our civilization has been for many centuries before us and I don't see changing any time soon or as long as perverts like Jeffrey are allowed to walk around freely and procure our daughters off the streets all because he's got a lot of money to pay many, many, many people off.

Throw out your confetti because here I come Chang-Mai!! My celebrations started the second I landed, it didn't take me long to make myself acquainted with a few fellow travelers and find the hot spots of the hustling city. It was like nowhere I had ever been before. The streets were lined with stalls offering an assortment of souvenirs, clothing, and knick-knacks. Everyone lived so freely and was in such great spirits. The parties raged on until the wee hours of the morning and people became best friends over night. From the second I got there I knew Thailand was going to be a lot of fun and I was right! Popping bottles of champagne, dancing all night to the beat of every club's rhythm's along my way and carrying on like it was my birthday...every night was a repetition I could definitely get used too. During the day I was a real good girl, the teachers pet even. Showing the credibility of my experience in massage from over the last few years and already ahead of the class the teacher was using me to help instruct the others with demonstrations. Mostly in a class full of males it wasn't a surprise that I made friends with quite a few of them, some of them with ulterior motives, but for the most part the sleazebags were none of my concern, I had already dealt with a lifetime of them to be able to spot one out and steer clear of his approaches. Out of the entire class I had made friends with only one girl from Wisconsin. She was a plain looking girl with big brown puppy dog eyes and a long drawn out accent. Her first time leaving the States or Wisconsin itself for that matter so it was easy to acknowledge that she was a little taken aback by all of the bustling city life so becoming her friend felt like I was doing a good deed showing her around the hot spots of the Chaing-Mai nightlife. Eventually I even ended up inviting her to stay with me at my hotel. She was running out of money to party every night then pay for school on top of her accommodation, it was all becoming too much out of her small budget. So I thought about it and offered her a bed in my room, I had two of them anyways. Plus she was a really nice girl and if I could help make her first time out of the country an unforgettable experience then I was also gaining something from it as well.

The first month in quickly passed me by. Having such an incredible time on my own and putting my heart into learning Thai Massage it seemed to just fly past. Routinely I had to call in and check in with Jeffrey and Ghislane letting them know my whereabouts and progression in class. Counting down the time left until my course finished Jeffrey was anticipating my departure back to New York. "I can't wait to get my first Thai massage from you. I've got you booked to come straight back to New York for my first one as soon as your course finishes next month." His eagerness put a twisted familiar knot in my stomach. Reminding me of the dream I have to awake from soon and the reality of the certain homecoming I would be arriving to. "It's such a great course, thank you

so much for sending me here to learn this. You are going to love my new area of expertise! I am having such an amazing time over here!!” I had to let him know how much I appreciated what he had done for me and he loved the head swell that it would make him feel as well. Hating the thought of going back to him, I wasn’t going to let that put a damper on my spirits while I was still out there. It was my time to party harder than ever before. Every night was a new adventure for me. Chang-Mai was a maze of places to get lost in and the vibrant city was my playground. The way I saw it this was my last chance to get out and break free, letting loose my inner girl it felt so good to take the lead of my own life.

Chapter 21

It was an average evening getting ready in front of the bathroom mirror on just an average Sunday, though unbeknownst to us girls as we sat there chatting away carelessly, this night was already written in the stars for me. It was a very long time ago now when I was still a young child that I sat looking up to those same stars from my bedroom window with my hands pressed tightly together as I cried for God to hear my prayers. All I asked him for was death. My precious life was already such a hopeless battle that I felt too small to fight alone for. Begging him to deliver me from this cruel world I would pray for all of my pain would to away for good. My only clause in my prayers was the possibility that there was somebody in this wide world that I was meant to love, something much bigger than I could have even imagined yet. This invocation of mine was forgotten about long ago now, until tonight.

I wish I had known that night I sat crying beneath the stars that it would all be different one day and that I hadn’t sold myself short to the accustomed lifestyle I was brought up to believing was acceptable. It was this night my very soul was about to cosmically collide with the man I was always meant for, the man my heart already belonged to and would know from the instant we met. This night would be the first day to the beginning of my new life to come.

I blushed my cheeks and put on my mascara before me and my girlfriend headed out to hit the town. We were dressed to kill and looking for something to do when we ran into a few of our class mates at one of our favorite drinking spots. They were meeting up for some drinks before a Muay-Thai kickboxing tournament. It sounded like fun when they invited us along to watch it with them. The massive crowd lined the street where the fight was being held and once I got inside the arena it was push

and shove to try to find a spot to watch from. The friends that we were hanging out with were meeting up with another group of guys that were training for the kickboxing tournaments that we were watching. Then it happened it was the first moment I laid eyes on the man that would love me for the rest of my life. I wasn’t expecting the most amazing time of my life to happen right there and then but it did and I would never be the same again. Destiny fell right smack into my lap and there was no stopping it! It wasn’t just his smoldering appeal that was obvious at first sight it was the entire package of mannerism and chivalry that made him stand out of the crowd. Stepping right out of the pages of the fairytales I used to read, he was nothing like I had ever come to know before.

Watching him from a close distance he was playfully shadow boxing one of the guys from my massage class and it was at that moment that this handsome stranger first caught me staring at him. From top to toe this athletically built man was intriguing to watch, I couldn’t take my eyes off him like I was magnetically drawn to his power of attraction. He further interested me when he wasn’t acting like the majority of harping dogs that would jump at the eyes I was giving him now. Instead he coyly played hard to get, making me work for any conversation with him. The fight started and the men were going bezerk, screaming at the fighters in the ring offering either fighter their support or discrimination depending on whom they were battling for. It was like watching a primitive scene out of the days when the cavemen ruled the earth but it was as equally alluring to watch unfold, the sweat, the blood and the absolute brut fascination of it all.

After the fight and all of the men revved up from the fight, I suggested that we all head to the pizza joint in front of the Princess Hotel where I was staying for a late night snack. I made it my goal to make myself known to this appealing stranger. In the tuk-tuk on the way there I made sure I sat next to Robbie. Scooting my knees closer and closer to him on the short ride he continued his chase by moving further away from me, a game of cat and mouse that I loved. When he answered back the array of my questions he had the cutest Aussie accent that drove me absolutely wild.

Gradually we got to know each other better over a pie of peperoni pizza and two can’s of coke. Too me he might as well have been the only other person in the restaurant, he knew he had my undivided attention and I think he liked it. There was no one like him that I had ever met before and I knew there was no other who could make me feel the way that I felt at the first sight of him. Being charming and suave was all an accidental front. It was easy to read him. Immediately it wasn’t hard to see his sweet side, holding the door and pulling out my chair at the restaurant, I was

already smitten. After pizza he walked me across the street to my hotel where we made plans to meet up again. There was no kiss goodnight or anything like that. No, he was too polite for that, he wanted to prove himself different and different he was. Walking through the hotel's revolving doors I watched as he walked away and when he was finally out of sight, I sung my way up to my room. Floating on cloud nine I was free falling into a deep pit of love.

The next day I attended my class as usual but not able to concentrate like I normally did, too excited about when I'd be seeing Robbie that night again. As I walked out of class that afternoon even the teacher noticed a difference in my performance and asked me if I was feeling well, "On top of the world actually" I smiled back at the old instructor and it wasn't far from the exact truth either. I hadn't ever felt the churning of butterflies in my stomach and the constant thoughts of anyone else like this before. My girlfriend and I got a tuk-tuk back together as we usually did after school and I couldn't shut up about the night before. She was laughing at my girlishness telling me that anyone who just met me would think I had never been let out before, but little did she know that I had more than my fair share in experience with men and never had I ever come across anyone that could make me feel this way, and what spun me out even more was that it was such an instant attraction. Never considering myself a person who believed in the existence of "Love at first sight", but a true romantic deep at heart, I couldn't help but believe in it now. He is my walking proof of it!

Waiting for me in the hotel lobby was the very person I couldn't stop entertaining the thought of all day long, there he was looking ever so fine standing in front of me now. The whole entire world faded away and all that was left for the moment was this complete stranger I had only met last night but somehow captivated the very essence of my very heart. There was no need for me to try and act cool now. He already knew I was snagged hook, line and sinker. Smiling all the way up the many stories in the elevator up to my room he took notice of the posh décor of the hotel. "You should see where I'm staying, this is a royal palace compared to it" His first impression of me he automatically thought I was going to be a spoiled high-maintenance girl that had money coming in from a parents hefty trust fund. Casually he got to find out through many deep and meaningful conversations that my life's grim story wasn't that pretty at all. For some reason beyond my knowledge I had the need to tell this stranger almost everything.

Wanting to be judged and looked down upon for everything about my life that I knew was wrong and being the first time I had spoken about my years with Jeffrey to anyone honestly like that ever before, I had felt like I had deserved punishment. He offered me no judgment, instead only

gave me his warmth and compassion as he wrapped his strong arms around me, making me feel so meager and small but so safe at the same time. Encouraging me to see the worthiness of myself and leave that life behind, he adored me with a kind love that I wasn't accustomed too.

He took me in and made me feel so at home. It was like I had known him my whole life. I couldn't bear to be without him another second while I was away on this dream holiday. When he wasn't training for Muay-Thai tournaments and I wasn't in school, nobody would ever see us. Too enveloped in each other in my hotel room to care about anything else. Which is why I asked him to come stay at my hotel with me, seeing he was never at his own anyways. My girlfriend was soon departing back to Wisconsin, making my room more than available for him. Enchanted by his words and tender touch, the way he made love to me was again like nothing I had experienced before. Even down to after sex as I had been routinely instructed by Jeffrey to get up for a warm washcloth to clean his genitals afterwards, he refused it, telling me I was no longer a slave and that he didn't want me acting like one. He'd just rather lay down together afterwards and repeat our sweet nothings with many adjoining kisses.

On our third night together with nothing but the bed sheets between us, we had spent all night looking into each other's eyes sharing such an undeniable passion for one another. In the deepest caverns of my heart I knew this man would give me what I had never experienced before... True love. We were still laying in each others arms when the orange and pink sunrise began to rise slowly through the peak's of my rooms windows, enticing me to come feel the freshness of the morning's chill. Only the bed sheets were still wrapped around my body as I went the balcony. It was overlooking the city in a valley surrounded by mountainous tops. My thoughts began to rampage through my head and I knew this could only be a dream for me. It was getting serious now, too serious for the life that I led back home. As if he sensed my anxiety Robbie walked up behind me and wrapped his strong arms around my waistline, gently kissing my neckline and pausing with his ever so thoughtful stares and gave me the exact opening that I needed to expel my thoughts. "Back home, as you already know, I am going back to someone else, it's my job, and as much as I really like you, this guy that I kind of see is going to expect me to be putting him first, I am so sorry to say all of this after such a wonderful few days we have spent together, but you need to know this thing happening between us can't get anymore serious than what we have for now. I am so sorry" I looked down to the floor with nothing else I could say to alter his perception of me now that I had told him the truth and it never dawned on me that thought he wouldn't be out the door before I could even finish my sentence but he

continued to surprise me with his efforts to make me believe we were more than just friends with a summer crush. “You see... your problem is that you don’t see what I am looking at right here in front of me, a beautiful girl who is completely lost in a game that she has no control over. Get out of it now, take my hand and follow me back to my home in Australia.” I heard what he had said but I found it hard to comprehend what he was actually talking about. “What?” I asked him with a look of confusion on my face. “Your nobody’s property, you can do this. Marry me.” His statements got more and more profound as he went on. Repeating the question he got on one knee and proposed again “Jenna, I am in love with you and want to spend the rest of my life making you happy. Please don’t go back to him. I know that I am the only one for you and I will always treat you right. He paused for another second and repeated his question “Jenna, will you please marry me?” My hands fell into my face after that and without even letting myself think through the answer, I let my heart do all of the talking. Looking back up at him I said “Yes!” I almost shouted the answer at him, as if saying it louder would give the word more meaning. Wanting to believe him and everything that he was saying felt like a vacation from all of the suffering and loneliness that I had endured over a lifetime of abuse and degradation but knowing what you want and getting it are two different things that rarely went hand in hand...or so I thought. All I knew from the brief period I had known this stranger was that he was offering me a life and love down an unfamiliar path and it was a gamble to believe a complete stranger but somehow I knew he was right. My heart was beating so loud I thought it was going to jump right out of my chest. With the earnestly in my reply he picked me up in his strong arms and took me back to the bed and reiterated his words in a more physical sense this time. Never had I felt loved like this before, so swept off my feet and unable to even think, eat, or do anything for that matter which would involve leaving the hotel room without him.

Everyday after school would be my Robbie waiting to take me back to the hotel room for another night’s passionate rendezvous, but a few nights after his proposal, he had another surprise in store. He didn’t just want to get married someday. He wanted to get married now, this week even. I walked into the fabric store and was attended too by several seamstresses who were already be expecting my arrival. I was there to design and have fun designing my own dream wedding dress. While I was busy picking out fabrics and having measurements taken I would look away for a moment only to catch his tender eyes staring in my direction. Such adoration behind his looks...could it be real? I would often ponder it to myself just hoping for the gamble I was taking to work

out. I still had to believe in something better than what I was accustomed too and here he was right smack dab in front of me.

Giggling at all of the lace and frills they were trying to dress me up in, looking more like an antique porcelain doll than anything else I closed my eyes and pictured the day that I thought would never come, starting to imagine the kind of dress I would like to wear I envisioned a simple sleekness, a complimentary figure hugging gown with a small train but long enough to distinct it as an actual wedding dress. After we settled on what we were going to wear for the big day, we would next have to decide where we would hold the ceremony. Not before celebrating the entire week beforehand though. We started our honeymoon early celebrating every night spending our time between my hotel room and sending our heads spinning on the dance floor at many different clubs. Only with each other in sight, the dance floor was ours, we were out to give each other something to remember each night by. I whispered all of the things I couldn’t wait to do him once we got back to the hotel room and watching him heat up on the dance floor I was never able to get enough of him driving me crazy. Like a thirst I was unable to quench, his lips were like a fountain of deep springs that I could never reach the bottom of.

Seven days, exactly a week after his proposal I sat on my bed in distress, contemplating what I would say to the man who I was about to call. There was no nice way to go about it. I couldn’t last forever with him and this was my one chance to get out of it for good. I was leaving him, never to return to him ever again. I just had to go ahead and do it. Part of me was hoping he’d be at least a little happy for me and the sudden change in my life’s direction but the other part of me knew I was already asking too much of him.

Calling his office in New York I was transferred to Jeffrey’s personal office. He picked up the phone on the third ring, pausing before I could get any of the words to come out of my mouth but I mustered up my courage eventually and gave him my prepared spiel. Beginning with how much I had appreciated everything he has done for me up until this point. I hoped he would be understanding but he just wanted me to hurry up and get to the point. Trying to contagiously pass on my excitement through the phone lines, I finally screamed out “I’m getting married! Can you believe it?” No reply was given only a silence on the other end. Trying to make some conversation ridding the uncomfortable silence, I went on to tell him about Robbie and how I had fallen madly in love with him over the last amazing few days we’d spent together. The absence of sound made my thoughts begin to run wild and to get some response I had to ask him what he thought about everything I was telling him. Finally a few seconds later his reaction to the news sunk in and his only and final reply

until many years to come was "Have a good life!" With that statement he slammed down phone receiver. Leaving only an echo of the dial tone to answer back too. I was to be paralyzed from the shocking response. "What have I just done?" was the first thing that entered my thoughts. Overwhelmed with guilt I felt like I was falling down a deep and dark hole and then the tears began to flood in. Here I was standing at the dawn of a new happy life for myself and I couldn't see past how bad I had let Jeffrey down not yet seeing the hold he had on me.

Like my knight on a white horse, in came my hero to soothe my somberness. He rushed over to the bed where I was beating myself up mentally and wiped the falling tears from my cheeks. "I take it that it didn't go so well...huh?" Sniffling through my sobs I managed to tell him that "It doesn't matter anymore all I care about is you and leaving all of that life behind me!" I wrapped my arms around him and he asked me in a half joking voice "Then why are you crying?" He got me almost laughing now too "I guess it's just so scary taking such a huge plunge away from what I'm used to and taking such a big move to another country. It's just all so different and I'm just trying to comprehend everything that is happening in such a short time." Always out to lift my spirits his next comments made me gush in laughter "You think that was a hard phone call wait until I call my Sicilian mother! Watch this, I know exactly what she'll say. First it'll be a saga about how I'm killing her with my selfish actions then it'll be about how she's going to kill herself for doing such a terrible job raising normal children. Don't worry though, she'll love every second of it. Wogs thrive off of the drama in their lives and off everybody else's for that matter!" He was pretty much on the dot when he told me how she'd react to the news. In the end after relentlessly trying to change his mind, she sighed, "If it was going to be anybody to do something as crazy as this, Robbie, it would be you!" It wasn't a blessing as such but at least she wasn't threatening suicide any longer.

Calling the closest of our families the night before our wedding to share with them our announcement wasn't celebrated by any members of either sides but that didn't discern us one bit. My parents took it well, considering their only daughter was marrying a foreign man that they didn't know from the next guy on the street and too top it off I was moving to Australia, permanently. When I asked my Dad many years later why they hadn't put up a fight, he just simply replied that nobody expected it too last very long. Fair enough, I thought. I don't think anyone did at first...even us at our toughest times. We were a rare attribute these days in the numb era we have all been accustomed to living in, turning nothing into something, which I had also come to realize, was the most precious gift in life...Love.

Falling asleep was easy to do in his arms that night. I laid my head on top of his chest listening to the drum of his beating heart. I had never felt like I was more at home than ever before in my life. He pulled me gently in closer to him, letting me know that he was there for me even when the lights went out and the thoughts would usually creep in. Amazing how he knew what I needed without even asking for it. Wishing for something like this my whole life I thought I was being such a fool in so many ways, but I was so wrong. The way his pretty eyes looked at me with such an understanding and compassionate sincerity made me want to trust his words and believe the love that he was offering me was indeed real.

The next morning, Robbie was up and out of bed early to pick up our tailored wedding suits and dresses for our big day at Doi Cept Temple. His best friend from high school days that was travelling with him from Australia met him in the hotel lobby at seven o'clock. He was going to be joining us for the wedding as Robbie's best man. He still hadn't been able to find black shoes to go with the suit, so after he dropped off my dress back to me he was off again to try and find himself a pair of decent looking ones. Overjoyed with excitement I was thrilled from the second I kissed Robbie good-bye for the last time before we were officially married. Looking in the same mirror only a week ago I was now a different person, I felt like I was plunging into a bottomless abyss. Here I go, I thought to myself as I plunged out the door letting the butterflies in my stomach carry me all the way to my nearly husband.

I had to go to the beauticians that morning for my pre-wedding makeup and dressing. The ladies who were doing my hair and face at the salon did a great job making me feel so beautiful for my special occasion that every girl dreams about their whole entire life. Requesting simplicity at best, not wanting to go overboard with all of the wedding apparel they tied my long hair up into a knot wrapping around it a veil of flowers made up of baby's breath and small yellow and purple budding flowers. I couldn't have dreamt it up better myself and when I met my husband to be at the bottom of the mountain he stood before me speechless "You look so... beautiful!" were his first words that his mouth formed almost whispering them. He took my hand and we walked into the sky lift together. Behind us followed an interpreter that Robbie hired to translate the Buddhist Monks ceremony speech for us English only speakers and then his best friend, who only moments before gave him the best mans speech about being the last chance to walk away from this and not get married to a girl he hardly knew, but my Robbie wouldn't hear a word of it. He already made up his mind the instant he proposed and I said yes, "I was born to be with this girl," he told his best mate. "Alright then lets go do this then!" Once he knew Robbie was sure in his decision he was more than ecstatic for him. We were slowly lifted up the tremendous mountainside,

surrounded by the floral green carpet of mossy grass that covered the earthly skyscraper and falling fog, it was like being carried to heaven or the closest thing to it! Taking my eyes off the scenery and catching him adoringly staring at me again, I welled up with unstoppable tears. "I am so lucky, is this really happening?" He squeezed my hands and replied back "You're the only one for me...I love you!" relieving the anxiety written all over my tear stained face.

Chapter 22

Getting out of the carriage we were greeted by good fortune from the Gods above. A sun shower cascaded over us as we advanced into the ancient holy temple. My tears of joy dried and my happiness was glowing for all to see. The many visitors to the temple stopped and took photos of the passing bride and groom, no other foreigners had ever been married there and certainly anyone wearing traditional western wedding attire, such a sight had never been seen behind these religious walls, we became a permanent icon at the temple. The ceremony was done in the Buddhist customs according to their ancestral accordance, and translated for us in our own language. Both Robbie and I were anointed with a blessing from the monk with a splash of water and seven sacramental bracelets, each one representing another meaning to the longevity of our union together. We signed our names in the Buddhist wedding registry of Doi Cept Temple and officially became Mr. & Mrs. Roberts at least officially in our hearts knowing the laws of Australia only recognize certified weddings, meaning when we got back to his homeland we'd have to make a run for the courthouse. This was our real wedding though, perfect down to every detail. Walking up to the highest point of the temple to the balcony hanging over the edge of a cliff side over looking the city of Chang-Mai, we knew we had found the perfect spot to recite our vows of love to each other. Providing everything for me and more than I could ever ask for, his vows were to love me unconditionally until death do we part, shelter me from all the cruelty in the world that I was so accustomed too and to be like the bear, because the bear never forgets. Tears once again streamed down from my eyes as he made this moment unforgettable. Wiping the mascara fading underneath my eyelids whilst giggling at my embarrassment I took his hands back into mine again and gave him the vows that were the sacred prepared words from my heart. My ears were thundering the sound of a million horses hoofs descending downhill and my heart was beating so fast my words barely trembled out of my mouth when I began to tell him how much he had changed my

whole life around and how I would dedicate my entire being to loving him and only him until I blew my final breath.

I meant every word that I said to him, this was it for me, wanting nothing more out of life than to be with someone like him to raise a few kids together and grow old on the front porch letting the days fade us by. I know it probably sounds boring to most and it would've to me as well many years ago but after the life I had led, I had enough experience in the real world for my liking and now all I want to do is to enjoy the remaining days of my life for what it is...a simple and satisfying existence. Our day was so special but not only to us, even too the Monk that married us. Upon our descent down the lifts he asked if he could take a photo with the bride and groom in front of their symbolic liberty bell signifying the union between east and west. It represented a lot for us too, it was the commencement of a new life together and just the beginning of battling each other's past demons together.

Kissing the bridal party goodbye, who were just the local girls I had met on some of our many nights out of having fun. I threw my arranged bouquet of Thailand's white wedding floras mixed with colorful orchids to the screaming Thai women behind me and we were given one last tradition to take with us, the release of caged doves. It was such an incredible gesture, especially for me. Symbolizing their freedom as well as mine I opened the cage's door to let them free to decide our own fates. As the wings on the birds began to spread open and they took their final decent into the blue skies granting themselves freedom I knew mine had finally come too. The relevance of watching them fly away and how I had perceived my own day of marriage related to the identical feeling of fleeing an entrapment of my own kind. I was liberated from the bounds of slavery I had come to know over the many years I had spent with my fair share of greedy perverted old men only to have serendipity mend my scars with the powerful healing of what true love has to endeavor on.

As customary in the romance novels I had read as a young girl he picked me up in the hallway before our hotel suite and carried me over the threshold, poufy dress and all. My arms were tightly squeezed around his neck never once taking my eyes off of him until he revealed yet another sweet surprise. Besides the cleaners tidying up my room while we were gone they were also given instructions by none other than the groom himself to pick the petals off the stems of red roses to place on our bed in the shape of a giant heart. The rose petals led the way to where we consummated our love physically and it was undeniably the first time in my life I had really ever been made love too. Hours had passed by before we thought about anything else besides one another's words of arousal, tantalizing touches, and lingering kisses. We ate a quiet dinner at a local restaurant and went straight back to the arms of each other again, so

profoundly in love with one another it was the ideal display of what the “honeymoon period” should have to show for. It was crazy, young and energetic, just what it should be between two blossoming lovers.

The following morning we left the Princess Hotel, no longer under any of Jeffrey’s financial privileges or control so to speak, continuing our love spree in another dwelling of our own accord. Three days later when we finally showed our face for the first time since checking in downstairs in the new hotel lobby, besides to request fresh sheets and towels, the entire staff of the hotel had a good laugh at our expenditure, from their reaction it must’ve been nice to see a couple so affectionately fond of each other.

Now we wanted to have another type of fun, Robbie had visited a tourist agent by himself before we got hitched to book a honeymoon itinerary for us to explore Thailand and beyond together, another surprise he had in store for me. We left early in the morning and joined the crowded bus for our journey beyond the border of Thailand to a village in the war torn nation of Laos. When we got through the extremely armored visa office eight hours off the beaten path, we then had to cross a flooding river from a recent heavy downpour of rain in a slim banana boat that looked like it could barely handle our weight let alone the excess of my luggage that Robbie was so kind to trek around the world for me.

Unbelievably we did make it to the other side only to find that my honeymoon in the tropics wasn’t exactly how it had been explained to me. Naked children ran through the dirty streets, with one boy that decided to release his bladder on the pathway where we were walking as we passed by him on the way to our hotel. My doubts of his choice in destinations became apparent after that sight. Robbie was getting hungry after we hadn’t eaten the entire duration of the trip and being such a rugged man he could digest just about anything. Deciding to stop on the side of the road he ordered some kind of seafood dish...daring I thought, settling for some toast and jam, something safer I thought. Then I saw the lady behind the counter dip some plates in a dirty bucket full of dirty water and then rinse in another bucket of water that didn’t look as bad as the previous mud drenched one and then further proceeded to put my toast and his food on top of them serving it to us all in a clear view. I just couldn’t bring myself to even fathom it “I can’t eat that!” I mouthed in a hushed voice trying to quietly make my point clear but was made public with his loud mouth outburst of “Why not? Looks fine to me. You have to try and eat something, you haven’t eaten all day!” I know it was just his caring side that was trying to force me and to top it off he is Sicilian and they’re all about eating so it was our first debate and now we were officially married with many more marital conflicts to subsequently follow. Two head strong and stubborn people both with the right

intentions but still recovering from old wounds. It was only natural and important that we fought just as much as we made passionate love together. Countlessly proving to one another the true intentions of each other loves but sometimes in not so seemingly actions.

Finally arriving at the hotel it was like a scene out of a horror flick. We were showed up to the room that looked like someone had been brutally killed in. The bed sheets were torn apart and the bed was stained with blood from some poor helpless victim. Nearly vomiting at the pure sight of the room and the stench that accompanied it, I was now tearing at the thought of even staying here for a single moment longer. “No way!” I told my new husband and from the tone in my voice he knew I was serious. Not that I was not denying the fact I have never been an outback type of girl. I was fine with that impression, I am no snob but give me the simple luxuries of a clean bed and a shower then I’ll make myself at home, but this was just the epitome of filth and even possibly an act of a horrendous event but who knows, the lady who showed us to the room seemed fine with it passing it off as a hooker on her period. In some ways that was even worse...”Yuk...Okay Robbie it’s time to go...now!” we were heading back down hill back to the passport center declaring our passage back into Thailand. Considering us a risk due to the short time we spent crossing the border and back, the officials held us at gunpoint while others rummaged through our luggage for drugs or whatnot. Finding nothing of course they released us and stamped our passports, making us good for another three months if we wanted. We were thankful for escaping with our lives alone, although we had nothing to hide but still an endearing experience nonetheless in the first days of our honeymoon of all days.

Chapter 23

Arriving in Koh Samui for finally a bit of relaxation in the tropics, it was my idea of how a holiday should be, sunny warm, and clean... well, clean enough. We lived it up like kings for the next six weeks. Making it an ideal way for two strangers to properly get acquainted. Dancing into the wee hours of the night and making love in the blistering heat of the sunny days we discovered everything on that island... mostly being each other. We made friends of all sorts, mostly travelers, but everyone the same in being taken aback by our fairytale romance. With our captivated eyes never straying too far from one another anyone could easily see the strong chemistry between us.

Trying to find the woman in me wasn’t difficult, as I took to the bounds of marriage with such ease, no longer a girl I loved the idea of being a

wife and belonging to a husband like Robbie. Marriage was bliss for the duration of our honeymoon until we had to ride coach on our way to Bangkok Airport to fly out to Australia. Chatting away with always so much to say to each other we watched a movie and finally got comfortable leaning up against each other as pillows. We both fell asleep on the long ride and when we woke up to the sound of the buses brakes coming to a halt we initially realized my purse and Robbie's wallet with all of our money and cards in it was missing. Stranded in the city of Bangkok was frightening enough as it was but too make matters worse a lady looking in her mid-seventies, scrawny and hunched over from an obvious lack of nutrition lifted up her skirt to a passer-byer with a she-male hanging off his arm and began smacking her vagina blaring out "Look! No cock...Pussy, pussy! Only five baht" repeating herself many times over the man just walked on past as she sat back down on the curb waiting for the next alluring customer. Robbie and I shook our heads in disgust and disbelief, things could really be that bad for someone, I would know best as it wasn't far off the life Jeffrey had been training me up for.

Completely broke at two o'clock in the morning and with no one to call for help, I panicked right away. Robbie rubbed my back and his tired eyes trying to make the situation better. Luckily we had made friends with some really nice people from the resort on the island who gave us about two thousand baht when they saw how devastated Robbie and I were. With just enough money to rent a really cheap room for the night at a backpackers hostel and pay for a taxi to the airport the following day, we were saved.

Early the next morning we were off in separate planes, since Robbie's ticket was pre-booked and no available seats left for me to join him meant we would be landing in Australia separately. Fortunately we had found a corresponding flight that arrived within the same hour of each other but I would have to make a stop over to the Philippines. The lengthy hours of the duration on the flight seemed to stretch on with only the thoughts of the journey ahead of me I couldn't wait to get back to my husbands loving arms. The trip was going well, sleeping the majority of the flight until I had to change planes in the Philippines.

After the plane landed and before any passenger was allowed to get off we were handed a declaration statement that informed us that if we were carrying any drugs or weaponry, we would be arrested and face charges with death as the ultimate penalty. Not that I had anything to worry about, but what a thought to willingly sign over your life. I got the chills handing over my signed declaration and traveling documents to the customs officer. Obtaining my passport he additionally asked to see my departing ticket. No problem I thought, just I had done many of times, and I handed over the requested information. The officer looked me over

and got on the phone immediately which sounded like a phone call to his superiors but I couldn't tell since it was in another language. A brief conversation but long enough to get me thinking, he then called over two guards who took me by the arms and brought me into an empty room but for a desk and three chairs to be interrogated. No one would tell me what was going on they all just scattered around in frenzy, ignoring all of my hysterical inquisitions. Leaving me by myself and alone with my thoughts I couldn't help but panic even worse now.

This was a total bombshell of confusion on my part, what had I done wrong? Minute's later a large-framed women in a green uniform entered the room with the guards from before and sat down across from me with a stern look in her eyes. She placed my documents on the desk in between us. Not saying a word to me she was waiting for me to give her an explanation for something. "Can you please tell me what this is about, have I done something wrong?" I asked her politely, trying to restraint any animosity towards her. Her reply sounded as grim as she looked. "You have been in Thailand for three months and now you have only a one way ticket booked to Australia with no visa. What exactly are your plans once you get there, Ms. Roberts?" To myself I wondered what business it was to her, don't people travel with one-way tickets all the time? Knowing I was in no position to be able to say anything like that or even at all I just gave in nicely and told her my intentions to travel over there. Crying through my entire explanation I wasn't sure if I was going to even make my flight now. She had to think about everything I had told her for a moment, deciding whether or not she would grant me permission to meet my husband in Australia or send me back alone to Bangkok. With only time on my side she had to make a hasty verdict now. One more question had to be answered before I was let go, she wanted some proof. "If you have just got married can you show me your marriage certificate then?" This didn't help my stories credibility at all seeing that we were married in a Buddhist temple and given woven bracelets instead of certificates. Explaining to her that I didn't have one to show her yet but was already aware that I would have to obtain a legal marriage certificate through a courthouse upon my arrival in Australia to stay there legally, it was only because of my husbands beliefs we wanted to get married in a Buddhist ceremony. She must have shared a common interest in religion or something like that as she finally cracked a smile upon the photos of the wedding day that I showed her and carrying in my purse since getting them developed, if she wanted proof, well this is all I really had.

Handing me back my documents and ticket I was now free to leave but she wasn't leaving me much time to run through the airports terminal to get to my departing plane. Expeditiously bolting through the busy airport

my adrenaline was still pumping from the previous encounter with the officials of the Philippines who had enough power to condemn me if they had felt like it. I caught my plane in the nick of time and once I was settled in my seat my thoughts went back to my dear Robbie and how much I was missing him. I was just relieved that I was on my way to be back with him again soon.

Looking out the window I could see the red earth beneath me. As I landed for the last time I took notice of the first steps I walked off the plane and onto a new soil for the first time. I had so much to be looking forward too in my new homeland. In my heart I knew this was all I ever wanted, this was going to be my haven. There was another surprise in store for me when two elder strangers walked up to me and asked my name. "Are you Jenna?" Nodding at their question they gave me their first names and wrapped their arms around my neck. My new mother-in-law then said, "We are Robbie's parents. We wanted to be the first ones who welcomed you to Australia and into our family" It was my in-laws meeting me for the first time. Handing me some balloons and flowers they even had gifts for their new daughter-in-law. While waiting for Robbie's plane to arrive we all chatted about many things like the flight over from Thailand and the scare at the previous airport in the Philippines. I asked them how they knew whom to look for? My father in-law laughed, saying recognizing me was easy from Robbie's detailed description. He told them to look out for a petite, young blonde carrying an abundance of luggage. Laughing together over a few more brief conversations of getting to know each other better they seemed relieved to finally meet me compared how stressed she sounded in the conversations I overheard Robbie having with her while in Thailand.

Watching the arrivals board I knew Robbie's plane had landed ages ago but was just waiting for him to get out of customs. It didn't bother me anyhow, I was enjoying get accompanied with his parents for the first time. Eventually I saw my husband walking down the runway behind the gates, I just couldn't wait a second longer. I ducked underneath the gates and ran all the way up the runway to jump excitedly into his arms. I wrapped my arms and legs around him holding onto him for dear life. I just missed him so much I knew I would never let him go, theoretically speaking that is, and I never have nearly a decade later.

Chapter 24

Over the near decade we spent together, Robbie and I have shared the common highs and lows that every determined marriage endures. It has

taken a lot of hard work and doesn't come without its flaws but no matter what it is just perfect for the two of us. He helped me how to remember to smile again and life has slowly began to sort itself out. They say that time heals all wounds but what I had experienced in my young years wasn't nearly long enough to let all of the hurt go. Seeking help through many counselors and psychiatrists I was doing everything I could do to deal with the scars and all of the pain left behind. Completely off of any pharmaceuticals, since the last day of our honeymoon, and healing my heart with love instead of hate our marriage is my foundation and Robbie is my solid rock. We have to be for one another, putting the bonds of our union through the wringers and back, as neither of us expected my past life eventually to come back and haunt me after so long.

Our blissful life came to a sudden halt one day when we were out visiting my in-laws at their nearby house on just another plain afternoon. There was a knock on the front door and my father in law got up from watching TV on the couch to answer it. He rushed back quickly coming into the dining room, where I was feeding my nineteen months and five month old boys at the table, and he blurted out, "Jenna there are three police officer's at the door asking for you by the name of Virginia Roberts!" I asked my mother in law to stay with the babies to find out what this was all about. I didn't even think it had anything to do with Jeffrey at first and wasn't even worried when I opened the door to offer them to come inside to talk.

They weren't actually police officers and two federal agents of Australia with one F.B.I agent from America. The American agent asked if I wouldn't mind actually coming outside so that I may speak with them in private. "Okay" I said, as well as mentally preparing myself for something big from the look of it, it's not over a parking ticket or anything small that you get three federal agents knocking at your in-laws front door asking to speak in private. "Can we first ask you if you are in fact Ms. Virginia Roberts and originally from Palm Beach County in the United States?" I confirmed my name and previous state of residence then they even asked, "May we see some identification please?" A different agent asked the question this time and I told him "I will have to go and grab it, my purse is inside. I'll just be one second."

Robbie was standing on the other side of the door trying to figure out what they were doing here talking to me and when I rushed through it to grab my purse and saw him standing there looking puzzled, I told him I had no idea what this was about yet, but not too worry everything was going too be just fine. Taking a deep breath and slowly exhaling outwards, I opened the door to find out exactly what the agents wanted to talk about.

Pulling out my Australian drivers license from my wallet, I was going to hand it over to them but they were sufficed at a quick glance. There was no meet and greet, they went straight to the point. One agent picked up a briefcase off the porch floor and opened it up taking out a stapled stack of paper. Then that same agent asked me if I had ever known an affiliate by the name of Mr. Jeffrey Epstein. All of the sudden my stomach tangled in a familiar knot that I hadn't felt in many years from a past life that I was trying to forget about. I nodded in affirmation of their question and said "It was a long time ago and he's no longer an affiliate of mine, but yes, I did know him once." It was shameful enough to think about let alone talk about with them for the first time since I had started my entire life over. His next response left me nothing short of speechless. The United States Attorney's Office for the district of Florida was giving me a notification of being an identified victim. Jeffrey was finally caught for his atrocious acts of perversion on girls who were barely old enough to even comprehend "the birds and the bees" so to speak.

On June 30th 2008, Jeffrey Epstein pleaded guilty for procurement of minors to engage in and solicitation of prostitution. More than a dozen girls had been named as victims of Jeffrey's federal offense's and without ever stepping a day in court he was granted a plea bargain consenting to charges that named him a registered pedophile for only two of the minor girls. Getting away with even serving only twelve of the sentenced eighteen months behind bars be that in the evening alone and in the morning he was released during the day. Restricted to the confinement of his lavish mansion in Palm Beach only to be with his original sex slaves from over ten years ago, Nadia Marcinkova and Sarah Kellen, and knowing Jeffrey all too well, they wouldn't be the only ones there while he was pulling his laughing stint of retribution. Even at nighttime the girls were still allowed to visit him, accounting to nearly seventy times while serving his time in incarceration.

No justice had been served for any of us victims. Denied the very constitutional rights allegedly there to protect and serve us. We weren't allowed to have a voice in front of a jury and judge or even informed for that matter. Instead we were handed this notification of being a victim but told we were all too late to do anything about. To make matters worse part of that plea bargain was that we had the option to sue him with the lawyers he provided for us, and conveniently enough I found out later they were also his lawyer's old friends from the college days.

I felt my knees go weak and the anxiety churning in my stomach was now making me feel sick. Taking the bundle of paperwork from the agent who was now handing it to over me, I had to excuse myself before my legs actually buckled. Closing the door behind me I couldn't even find the words to tell my husband what was going on. I rushed to the back of

the house and went out to the back yard where I wanted a minute to compose myself and process the information I had just been told. Robbie followed behind me but the stillness in my eyes convinced him to give me that moment to compile my emotions.

A few moments later and I was ready to talk. Collapsing into his arms with such anguish, he just held me until my sobs subsided and I was able to tell him what actually happened. Starting with an apology, I began to tell him how I was so sorry but my troubled past has come back to plague our simply sweet lives and was just about to turn it all upside down. He was so understanding from the beginning of all this, telling me that he will always be behind every choice that I make in mending the sorrows of my tormenting past and there he has been through all of the thick and thins.

Deciding to call the lawyers on the victim suit provided for me was a big decision but one I had to do to seek the unanswered questions from my battered heart. The two women at the firm that I spoke to treated me so wonderfully, like long term friends they counseled me not only in the terms of a lawsuit towards Jeffrey but also in the matters of being emotionally and sexually abused. I chose to proceed with the lawsuit at least to make a statement to a man that tried to make a degrading statement about me so long ago. Now it was my turn, I had the choice to turn the tables on him hoping he would feel embarrassed and in the spotlight for everyone's entertainment where he had kept me for so many years.

Winning my lawsuit against him was not enough to heal old wounds, I never got the chance to stand up in front of a jury and tell them how much pain I had endured and still endure throughout the many nightmares I face when darkness hits and the silence of the sleeping household fills my head with pictures of reliving my past with him or the others he sent me too. Or did I even get to hear him confess his guilt and suffer the way I did locked in confinement for many years? No, instead I got to see a picture of Jeffrey with his arms around a very youthful looking teenager, if even that, parading the streets of New York, the very way he had with me and so many other girls long before.

As if it were a public display intended for not only his many victims to see but also a spectacle for the public justice system, it was bold show of insolence laughing in our faces while we all sat by not being able to do anything to help these young girls from the streets still suffering how perverted afflictions. Not much longer there was another story on Jeffrey I saw in the papers of him and Prince Andrew having a stroll together in Central Park. It instantly sparked my concerns for other girls in the very same position I was in so long ago and he was obviously up to the same old tricks, I had to do something now. Not being able to sit by any longer

with the knowledge of being able to help out in some way. I had to tell my story no matter how shameful it was to even speak about. Putting my shame aside I had to derive every bit of courage I could sustain and now I am ready to tell it. The hardest lesson I had failed at learning until later on in my life became my strength, the belief in my inner voice and the ability to speak up. I do have a voice and now the world is going to hear it in my whispered cries for justice. Swept away by a surge of media with one phone call I sent Jeffrey's publicist into frenzy. Not to mention the release of the photos showing the first night that Prince Andrew and I shared together that I so happened to unveil for the public to see.

I spent too much of my life going out of my mind waiting for the rescue that never came until it was too late and then the scars were already imbedded deeply within. Thankfully I am now free from the struggles that nearly destroyed the love inside of my heart. I only wish it could be the same for the other victims, not just of Jeffrey's inflictions but every person who has ever suffered at the hands of another.

I'm here to tell you from my own experience that the moon is yours if that's what you want, all you have to do is stand up and take it. If some girl off the streets of Florida, like me, can stand up against the tyrants that run the deep pockets of our world, than anyone can. Just like I needed to believe that someone stood up for me once like Robbie did long ago, I now stand up for us. For all of us girls, the ones who are still on the streets and think they don't deserve better or it's an unachievable dream to be entitled to more out of life. For all of the beautiful girls who don't see beyond they're outside appearance. For all the girls still trapped in enslavement and unable to get out of the abuse that holds them down. But most of all, I stand up for every girls belief in love, because it is the very savior of my spirit and soul.

The End

Written and Illustrated by Virginia Roberts

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
VIRGINIA L. GIUFFRE,
 Plaintiff,
v.
GHISLAINE MAXWELL,
 Defendant.
-----X

15-cv-07433-RWS

MOTION TO REOPEN DEPOSITION OF PLAINTIFF VIRGINIA GIUFFRE

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Pursuant to Federal Rule of Civil Procedure 30(a)(2), Defendant Ghislaine Maxwell seeks leave of the Court to reopen the deposition of Plaintiff Virginia Giuffre, and as grounds therefore states as follows:

INTRODUCTION

Plaintiff has engaged in an active effort to hide relevant information and prevent the fair examination of Plaintiff on her claims. Due to these multiple and repeated discovery violations, key information and documents were unavailable to Ms. Maxwell prior to Plaintiff's depositions on May 3, 2016. Some obviously relevant documents and disclosures remain concealed and are the subject of pending frivolous efforts by Plaintiff to evade her discovery obligations.

Recently, Plaintiff completely changed her Rule 26(a) initial disclosures and added multiple new witnesses while deleting many others. In addition, in the initial deposition, Plaintiff's counsel improperly prevented Plaintiff from testifying regarding key relevant non-privileged information without basis or justification.

Finally, Plaintiff has now provided an errata sheet to her sworn depositions testimony in which she materially and substantially contradicts her own testimony. For these reasons, Plaintiff's depositions must be reopened to examine her on newly discovered evidence and her contradictory statements.

ARGUMENT

"A person who has previously been deposed in a matter may be deposed again, but only with leave of the court." *Official Comm. of Unsecured Creditors of Exeter Holdings, Ltd. v. Haltman*, No. CV135475JSAKT, 2016 WL 1180194, at *3 (E.D.N.Y. Mar. 25, 2016) (quoting *Sentry Ins. v. Brand Mgmt. Inc.*, No. 10 Civ. 347, 2012 WL 3288178, at *8 (E.D.N.Y. Aug. 10, 2012); Fed. R. Civ. P. 30(a)(2)(B). Under Rule 30(a)(2)(B), courts "frequently permit a

deposition to be reopened where the witness was inhibited from providing full information at the first deposition” or “where new information comes to light triggering questions that the discovering party would not have thought to ask at the first deposition.” *Vincent v. Mortman*, No. 3:04 CV 491 (JBA), 2006 WL 726680, at *1 (D. Conn. Mar. 17, 2006) (quoting *Keck v. Union Bank of Switzerland*, 1997 WL 411931, at *1 (S.D.N.Y. July 22, 1997). “Leave should be granted to the extent that doing so is consistent with the factors set forth in Rule 26(b)(2), such as whether the second deposition of the witness would be unnecessarily cumulative, whether the party requesting the deposition has had other opportunities to obtain the same information, and whether the burden of a second deposition outweighs its potential benefit.” *Official Comm. of Unsecured Creditors of Exeter Holdings, Ltd.*, 2016 WL 1180194, at *3 (quoting *Sentry Ins.*, 2012 WL 3288178, at *8).

“Courts will typically re-open a deposition where there is new information on which a witness should be questioned.” *Id.* (quoting *Ganci v. U.S. Limousine, Ltd.*, No. 10-3027, 2011 WL 4407461, at *2 (E.D.N.Y. Sept. 21, 2011)). This encompasses situations in which other discovery has disclosed conflicting evidence on which a party should be questioned, when discovery responses and relevant information are produced after the previous deposition, and when affidavits produced conflict with the deponent’s previous testimony. *See, e.g., Vincent v. Mortman*, No. 04 Civ. 491, 2006 WL 726680, at *1–2 (D. Conn. Mar. 17, 2006) (allowing plaintiff to reopen deposition when one witness’ deposition contradicted defendants’ deposition and medical records); *Keck*, 1997 WL 411931, at *2 (S.D.N.Y. July 22, 1997) (deposition reopened where affidavit provided evidence conflicting with witness testimony); *Sentry Ins.*, 2012 WL 3288178, at *8 (permitting reopening of deposition based on production of document deponent unjustifiably failed to produce prior to deposition).

Requests to reopen depositions routinely are granted after a deponent materially changes her prior testimony in contradiction to previous sworn testimony. *Miller v. Massad-Zion Motor Sales Co.*, No. 3:12 CV 1363, 2014 WL 4979349, at *2 (D. Conn. Oct. 6, 2014); *Hlinko v. Virgin Alt. Airways*, No. 96 Civ. 2873(KMW)(THK), 1997 WL 68563, at *1 (S.D.N.Y. Feb. 19, 1997). “In addition, courts will also re-open a deposition ‘where the witness was inhibited from providing full information at the first deposition.’” *Official Comm. of Unsecured Creditors of Exeter Holdings, Ltd.*, 2016 WL 1180194, at *3 (quoting *Miller*, 2014 WL 4979349, at *2 (D. Conn. Oct. 6, 2014)). All of these factors are present in this case, necessitating the re-opening of Plaintiff’s deposition.

I. PLAINTIFF’S PRODUCTION OF KEY DOCUMENTS AFTER HER DEPOSITION NECESSITATES ADDITIONAL EXAMINATION

A. Plaintiff failed to identify her health care providers and produce their records prior to her deposition, despite this Court’s order

On April 21, 2016 this Court ordered Plaintiff to produce her medical records and identify all of her health care providers from 1999 to present and produce their medical records. Menninger Decl., Ex. A at 20-21. Undersigned counsel diligently followed up via phone and correspondence and requested that all information relating to Plaintiff’s medical treatment be provided prior to Plaintiff’s May 3, 2016 deposition precisely so that the deposition would not need to be reopened. Menninger Decl., Ex. B. On April 29, 2016, after telling this Court that she had disclosed *all* of her health care providers, Plaintiff served Second Amended Supplemental Responses & Objections, identifying *15 new health care providers*. Menninger Decl., Ex. C at 18-20.¹ For some providers, records were produced; for many, they were not. *Id.*

¹ Treatment providers identified included 1) Dr. Steven Olson, 2) Dr. Chris Donahue, 3) Dr. John Harris 4) Dr. Majaliyana 5) Dr. Wah, 6) Dr. Sellathuri, 7) Royal Oaks Medical Center, 8) Dr. Carol Hayek, 9) NY Presbyterian Hospital, 10) Campbelltown Hospital, 11) Sydney West Hospital, 12) Westmead Hospital, 13) Dr. Karen Kutikoff, 14) Wellington Imaging Associates, and 15) Growing Together.

At Plaintiff's May 3, 2016 deposition, Plaintiff identified an additional health care provider not identified in her Interrogatory responses and for whom no records had been produced. Specifically, Plaintiff identified a psychiatrist, Judith Lightfoot, who is located in Australia. Menninger Decl., Ex. D at 308-14 & 328-31. Plaintiff specifically claims that she has talked with Dr. Lightfoot regarding the impact of Ms. Maxwell's allegedly defamatory statement. *Id.* at 313-14. She claims to have been talking to Dr. Lightfoot from October 2015 to the present on a weekly basis. *Id.* at 334. Dr. Lightfoot also allegedly treated Plaintiff in 2011 (*prior* to the acts giving rise to this lawsuit), and apparently diagnosed Plaintiff [REDACTED]. *Id.* at 329. On June 12, 2016 (after Plaintiff's deposition), Plaintiff produced a single record from Dr. Lightfoot, an intake form from 2011. Menninger Decl., Ex. E. The remaining documents from Dr. Lightfoot, including records related to treatment from 2015 to present, have not been produced. Information relating to this treatment is critical, and Ms. Maxwell has not been able to thoroughly examine Plaintiff on her treatment by Dr. Lightfoot because her identity was not disclosed prior to Plaintiff's deposition, and her complete records still have not been produced.

At her deposition, Plaintiff also identified one of her current treating physicians as Dr. Donahue, [REDACTED]. Menninger Decl., Ex. D at 335-38. [REDACTED]. *Id.* Yet, to date, his records have not been provided.

On May 25, 2016, Plaintiff sent Ms. Maxwell additional records obtained from Plaintiff's treatment at Centura in June 2015. Those documents identify another medical provider, Dr. Michele Streeter, never previously disclosed. Menninger Decl., Ex. F at 4.

Lynn Miller, Plaintiff's mother, was deposed on May 24, 2016. During that deposition, Ms. Maxwell learned that Plaintiff was treated for [REDACTED]

[REDACTED].
Menninger Decl., Ex. G at 144. On June 1, 2016, Plaintiff produced additional documentation [REDACTED]

[REDACTED]. These documents identify three *additional* undisclosed health care professionals who treated Plaintiff, including Dr. Scott Robert Geiger, Dr. Joseph Heaney, and Donna Oliver P.A. Menninger Decl., Ex. H.

One of the medical providers that was disclosed, and for whom some documents had been produced prior to Plaintiff's deposition was Dr. Steven Olson. During Dr. Olson's deposition on May 26, 2016, Ms. Maxwell learned that he had records in his laptop that had not been produced prior to his deposition. Again, these records were produced after Plaintiff was deposed.² Menninger Decl., Ex. I at 36.

In short, at Plaintiff's first deposition, Ms. Maxwell learned of the identity of Plaintiff's treating psychiatrist, but did not have the ability to fully question Plaintiff regarding her treatment because of the late disclosure. Since then, at least four additional health care providers have been identified. Post-deposition medical records for at least four different physician visits, including Plaintiff's treatment [REDACTED] pre-dating the alleged defamatory statement have been produced. Plaintiff still has failed to produce any records from: (a) Dr. Donahue, (b) Dr. Hayek, (c) Dr. Kutikoff, (d) Wellington Imaging Associates, (e) Growing Together, (f) post 2011 records from Dr. Lightfoot, and (g) the remaining documents for treatment by Dr. Olson. All of the new information that has come to

² At the deposition, copies were produced that were difficult to read. Despite requests, legible copies have not been provided.

light, and the information that has yet to be produced, justifies the reopening of Plaintiff's deposition.

B. Plaintiff failed to produce emails from her iCloud and hotmail accounts

By interrogatory, Plaintiff was asked to identify "email address, email account, cellphone number and cellphone provider, social media account and login or screen name, text or instant messaging account name and number, that You have used, applied for or been supplied between 1998 and the present." Menninger Decl., Ex. C at 8-9. Plaintiff responded, identifying a single email address and three telephone numbers. Plaintiff's counsel verified those discovery requests pursuant to Rule 33(b)(5).

Through a detailed review of the documents produced by Plaintiff in discovery, Ms. Maxwell uncovered Plaintiff has used at least three other email accounts – one on iCloud, one on live.com, and one on hotmail.com during the relevant time periods. Plaintiff's counsel confesses that prior to being confronted on the issue, they never reviewed the emails in the accounts for relevant information. Menninger Decl., Ex. J. The claims that counsel did not know these email accounts exist is belied by the fact that they have now included "privileged" communications from at least one of the accounts on their privilege log demonstrating and indicating there are probably privileged communications in the account they have not reviewed. Thus, they both knew about the accounts and corresponded with Plaintiff using those accounts, yet failed to disclose the accounts or to review them for relevant information.

It was not until Ms. Maxwell subpoenaed records from Apple on June 8, 2016, that – two days later – Plaintiff finally produced emails from the iCloud account. Menninger Decl., Ex. K. Plaintiff still has failed to review or produce any documents from her live.com account or her

hotmail account.³ Plaintiff's attorneys claim they cannot access these accounts, or that those accounts have been closed. *See* Doc. #207. Through the service of a subpoena on Microsoft, Ms. Maxwell's counsel has learned this is untrue. The hotmail account remains "active" and Microsoft has preserved the information in that account. Ms. Maxwell's counsel provided the release from Microsoft so that the emails can be accessed. Menninger Decl. Ex. L. Plaintiff has refused to execute the release to permit the document production. The hotmail account is active, can be accessed, and Plaintiff has simply failed to review these accounts for relevant information or permit discovery of relevant evidence.

The limited information produced from the iCloud account shows that responsive information exists. The production includes Plaintiff's communications with FBI agent Jason Richards in 2014 and suggests that Plaintiff was in regular communication with him at various times, particularly in mid-2014. Despite this, few pieces of correspondence with Agent Richards have been produced. Plaintiff also produced an email to Christina Pyror of the FBI but not any response to that email.

The iCloud account also discloses a previously undisclosed potential witness, Sharon Rikard, a person working at a not-for-profit relating to sexual trafficking victims. Apparently, in March 2015 (well after the alleged defamatory statement), Plaintiff *for the first time* was doing something to attempt to make Victims Refuse Silence look like a real organization. This timing is important because it demonstrates Plaintiff was not in the purported profession of helping victims *prior* to the alleged defamatory statements (January 2015), and therefore cannot claim that the alleged defamatory statement related to her profession at the time the statement occurred.

³ Ms. Maxwell has issued subpoena for records from all of these accounts. Plaintiff had filed a motion for protective order, and thus is still trying to prevent access to relevant discovery.

It is completely unknown what other relevant and probative information will be uncovered in Plaintiff's previously hidden accounts, including her hotmail account. What is clear is that Ms. Maxwell has had no opportunity to depose Plaintiff about these issues, necessitating the reopening of her deposition.

C. Plaintiff has failed to produce her employment records

In the April 21, 2016, hearing, the Court also ordered that Plaintiff produce records relating to her employment history, including identifying her employer, dates of employment, nature of employment and earnings. Menninger Decl., Ex. A at 25. These documents are directly related to Plaintiff's damages claims for lost earnings and loss of earning potential – *i.e.* Plaintiff's own actual historic earnings necessarily informs the basis for any claimed loss of earnings. Based on the resumes provided by Plaintiff in discovery, Ms. Maxwell also requested personnel record releases for all employers listed on Plaintiff's resume, which were provided on April 29, 2016. Prior to Plaintiff's deposition, no employment records had been produced.

At Plaintiff's deposition, Plaintiff admitted that much of her resume was fabricated and replete with lies. Menninger Decl., Ex. D at 67-90. At least 3 of the employers included on the resume were jobs she never held – she researched the internet to find places where she might have worked, listed them as actual jobs, and then fictionalized her job description. With respect to other employers, she expanded the end date of employment to fabricate a continual work history. Plaintiff ultimately admitted that she has not held a single paid employment position since 2006.

After Plaintiff's deposition, Plaintiff provided additional documentation concerning her employment history. Through employment records releases (requested well before Plaintiff's deposition), Ms. Maxwell obtained employment records from Employment and Training Australia, one of Plaintiff's non-fabricated employers. Those records include pay history,

showing that Plaintiff's wage rate was under \$28,000 per year.⁴ Until now, Ms. Maxwell has not had the information necessary to examine Plaintiff on this lost income aspect of her damages claims.

D. Plaintiff has failed to produce her education records

In the April 21, 2016, hearing, the Court also ordered Plaintiff to turn over her education records. Again, this information, or forms to permit the release of the information, were provided well in advance of the Plaintiff's scheduled deposition, specifically February 12, to permit full examination on these issues. Again, Plaintiff did not provide the releases until mere days before her deposition, and only after this Court's order. Since Plaintiff's deposition, various education documents have been obtained through those releases, specifically documents from Plaintiff's various high schools, including Wellington High School, Royal Palm High, and Survivor's Charter School. The records contain substantial information conflicting with Plaintiff's previous testimony. Ms. Maxwell is entitled to examine Plaintiff on this previously undisclosed evidence.

E. Plaintiff has filed amended Rule 26 disclosures identifying new witnesses

Finally, on June 1, 2016, weeks after her deposition and in the final month of the fact discovery period, Plaintiff filed her "Third Revised" Rule 26 disclosures. She has expanded her list of witnesses with relevant information from 69 specific witnesses to 87. She curiously removed witnesses previously disclosed. With regard to all of these witnesses, she fails to identify who they are and what information they allegedly have that is relevant to the case. The stock description for each person is "Has knowledge of Ghislaine Maxwell and Jeffery Epstein's sexual trafficking conduct and interaction with underage minors." Menninger Decl, Ex. N at 14.

⁴ Plaintiff's Rule 26(a) disclosure claims lost income as "estimated lost income of \$180,000 annually, Present value of \$3,461,000 to \$5,407,000. This is based solely on the "average" earning of a woman Plaintiff's age. Obviously, any actual lost earnings must be based on Plaintiff's *own* earning history and work records, which is vastly different.

These disclosures provide no actual information, such as the type of alleged knowledge, basis of the knowledge or how the information is in any way relevant to this single count defamation case. She also has amended her document disclosures list but has failed to produce any of the new documents she has identified, despite repeated requests for these documents. *Id.* at 16.

These late disclosures are clearly improper and should be stricken under Rule 37(c), a matter for a different motion. Nevertheless, these material changes include witnesses that were obviously known to Plaintiff since the inception of the case. Ms. Maxwell is entitled to question Plaintiff on these disclosures to determine what, if any, relevant information these newly disclosed witnesses might have.

In total, Plaintiff has produced over 256 additional documents since her deposition, and other documents have been obtained through previously withheld releases. As will be briefed separately, there are multiple additional documents that have still not been produced. Of the information uncovered, much of it directly contradicts Plaintiff's previous sworn discovery responses and her sworn deposition testimony. This is precisely the type of situation that requires reopening Plaintiff's deposition.

II. PLAINTIFF'S COUNSEL INSTRUCTED PLAINTIFF NOT TO ANSWER RELEVANT, NON-PRIVILEGED QUESTIONS IN HER FIRST DEPOSITION

Plaintiff was instructed by her attorney not to answer certain questions during her deposition without basis. The questions did not seek privileged information, were completely appropriate, and directly relevant to issues in case.

It is axiomatic that counsel at a deposition "may instruct a deponent not to answer *only when necessary to preserve a privilege*, to enforce a limitation ordered by the court, or to present a motion under Rule 30(d)(3)." Fed. R. Civ. P. 30(c)(2); *Redwood v. Dobson*, 476 F.3d 462, 467-68 (7th Cir. 2007) ("Counsel for the witness may halt the deposition and apply for a

protective order, see [Rule 30(d)(3)], but must not instruct the witness to remain silent.”); *Quantachrome Corp. v. Micromeritics Instrument Corp.*, 189 F.R.D. 697, 701 (S.D. Fla. 1999) (counsel “may instruct the witness not to answer or may halt the deposition. Fed.R.Civ.P. 30(d)(3). Counsel may do so, though, only if he intends to move for a protective order under Rule 30(d)(3)”); *Harris v. Bornhorst*, 513 F.3d 503, 525-26 (6th Cir. 2008) (“despite the lack of relevancy of the questions to the claims asserted, absent a privilege or protective order, a deponent must answer questions posed at a discovery deposition”). Where counsel improperly instructs a witness not to answer, courts routinely require the deposition to be reopened. *Keck*, 1997 WL 411931, at *1.

At Plaintiff’s first deposition, Plaintiff was instructed not to answer three different areas of inquiry where there was simply no basis for claiming any privilege or right to protection. Plaintiff has never moved for a protective order on these lines of inquiry because there is no basis for prohibiting the discovery.

First, Plaintiff was asked to identify any statements printed or published by Sharon Churcher, the *Daily Mail* reporter who spent several days meeting with Plaintiff and published numerous stories regarding Plaintiff in 2011 and thereafter. Plaintiff testified that despite her very close relationship with Ms. Churcher, she no longer trusts Ms. Churcher and that Churcher did not accurately report portions of what Plaintiff told her. Menninger Decl., Ex. D at 216-26. When Plaintiff was asked to describe the statements Ms. Churcher reported that were inaccurate, Plaintiff’s counsel refused to allow testimony unless Plaintiff was given all of Ms. Churcher’s articles and had a chance to review them. Menninger Decl., Ex. D at 215-26. He refused to let Plaintiff testify based on her own independent recollection. *Id.* This is simply improper, and alone serves as a valid basis for reopening the deposition.

The second area of inquiry on which Plaintiff was prohibited from testifying was her communications with law enforcement since 2014, in particular regarding Ms. Maxwell. Menninger Decl. Ex. D at 244-45. Counsel refused to let Plaintiff answer these questions despite this Court's order that Plaintiff was to turn over all documents concerning communications with law enforcement, excepting only Plaintiff's own statements to law enforcement which would be provided for *in camera* review. Menninger Decl., Ex. A at 24. Rather than complying with this very clear order, Plaintiff's counsel refused to provide any documents regarding communications with law enforcement agencies (including their own), and submitted all documents for *in camera* review. Ms. Maxwell is entitled to all documents concerning contacts with law enforcement (both her attorney's communications, which have been ordered to be produced, and her own statements, which the Court should order be produced), and to question Plaintiff regarding the same.

The third question Plaintiff was prohibited from answering concerned her consultations with an undisclosed psychiatrist sometime after 2015. Plaintiff's counsel indicated this is a consulting expert. Even if that is the case, Ms. Maxwell is entitled to the identity of this health care provider. *Manzo v. Stanley Black & Decker Inc.*, No. CV 13-3963 JFB SIL, 2015 WL 136011, at *2 (E.D.N.Y. Jan. 9, 2015) (identity of non-testifying experts discoverable); *Baki v. B.F. Diamond Constr. Co.*, 71 F.R.D. 179, 181-82 (D. Md. 1976) (same); *Eisai Co. v. Teva Pharm. USA, Inc.*, 247 F.R.D. 440, 441-42 (D.N.J. 2007) (same).

In light of the clearly improper instructions not to answer non-privileged relevant questions, Plaintiff's deposition must be reopened.

III. PLAINTIFF MADE MATERIAL CHANGES TO HER DEPOSITION THAT COMPLETELY CONTRADICT HER SWORN TESTIMONY

The final and perhaps most compelling reason to reopen Plaintiff's deposition is the fact that Plaintiff filed an errata sheet for her deposition in which she materially contradicts her prior sworn testimony. Menninger Decl., Ex. M. A court may reopen a deposition if the changes to the transcript are made without adequate reasons, or if they are so substantial as to render the transcript incomplete or useless. *See Hlinko*, 1997 WL 68563, at *1 (citing *Allen & Co. v. Occidental Petroleum Corp.*, 49 F.R.D. 337, 341 (S.D.N.Y.1970)); *see also Miller*, 2014 WL 4979349, at *2.

Plaintiff's errata changes are astounding, literally reflecting complete contradictions of her actual sworn testimony by changing "yes" answers to "no," and indicating "clarification of answer" as the basis for total revision. A vast majority of the 20 changes regard a very specific date testified to by Plaintiff in her deposition that has a profound impact in this matter, as her attorneys are fully aware. Specifically, Plaintiff was confronted with the fact that on no less than 10 occasions she has sworn under oath she met Ms. Maxwell in 1999, when she was 15 years old. This is a lie. Plaintiff pinpoints this date based on the fact that she was working at the Mar-A-Lago spa. Discovery has uncovered that Plaintiff did not work for the Mar-A-Lago until 2000, and Plaintiff's self-prepared resume states that it was not until August of 2000 when she was 17 years old. Plaintiff had been well coached on how to answer to the prior perjured testimony, being prompted to claim that her sworn statements were a "mistake," and that she only learned her dates of employment at the Mar-A-Lago through discovery. Menninger Decl., Ex. D at 26. The question was then posed about when she "learned" of her mistake based on discovery, to which Plaintiff clearly and unequivocally responded on no less than six occasions that she learned her dates of employment at Mar-A-Lago in mid-2015 – before many of her

sworn statements. After a break in the deposition and being coached by her counsel, Plaintiff pulled back on her conviction regarding the date, and became less certain of the time frame, but still put the time frame in late 2015. *Id.* at 66. After her deposition, she *completely* changed the date she “learned” she was employed at Mar-A-Lago in 2000 to a firm date of mid-February 2016, over six months later than the date to which she originally testified based on her own independent recollection. Menninger Decl., Ex. M.

This is not the only substantive and completely contradictory change in the testimony. Plaintiff revised her very clear and distinct answer that she traveled to France three times to claims that she travelled to France “a few” times, and modified the credentials of her mental health care provider – the previously undisclosed Dr. Judith Lightfoot – from psychiatrist to psychologist.

The impact of the original (presumably true) testimony is a matter for another motion, as is the effect of the true reasons the changes were made. For purposes of this motion, what is important is that substantive contradictory changes by errata require that, at a minimum, Plaintiff be examined on the revisions.

WHEREFORE, for the foregoing reasons, Ms. Maxwell requests that the Court permit Plaintiff’s deposition to be reopened for up to seven additional hours of examination, and order that Plaintiff pay the costs and fees associated with deposition pursuant to Fed. R. Civ. P. 30(d)(2).

Dated: June 20, 2016

Respectfully submitted,

/s/ Laura A. Menninger

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

HADDON, MORGAN AND FOREMAN, P.C.

150 East 10th Avenue

Denver, CO 80203

Phone: 303.831.7364

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lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on June 20, 2016, I electronically served this *DEFENDANT'S MOTION TO REOPEN DEPOSITION OF PLAINTIFF VIRGINIA GIUFFRE* via ECF on the following:

Sigrid S. McCawley
Meridith Schultz
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401 East Las Olas Boulevard, Ste. 1200
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J. Stanley Pottinger
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StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons

EXHIBIT K

BOIES, SCHILLER & FLEXNER LLP

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Sigrid S. McCawley, Esq.
E-mail: smccawley@bsfllp.com

June 10, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
lmenninger@hmflaw.com

Re: *Giuffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Ms. Menninger:

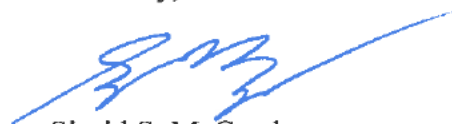
On behalf of the Plaintiff, Virginia Giuffre, documents, Bates-stamped GIUFFRE005607 through GIUFFRE005613, are being produced pursuant to Defendant's Request for Production. Certain of the documents within this production have been designated as CONFIDENTIAL in accordance with your proposed Protective Order. Please treat these documents accordingly.

This production consists solely of all data that is responsive to Defendant's various requests for production from Ms. Giuffre's iCloud account.

Attached to this letter, please also find an updated privilege log.

If you have any questions concerning the foregoing, or if there are any issues with the media, please do not hesitate to contact me at (954) 356-0011.

Sincerely,



Sigrid S. McCawley

SSM:dk
Enclosures

From: [Richards, Jason R.](#)
To: [Robert Giuffre](#)
Subject: RE: Hi There
Date: Wednesday, August 27, 2014 10:44:32 AM

Hi Jenna,

My suggestion is for you to do a Freedom of Information Act request (www.foia.gov) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of [REDACTED]. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps.

Best wishes,

Jason

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, August 27, 2014 9:49 AM
To: Richards, Jason R.
Subject: Hi There

G'day Jason,

I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an era, just need a couple dates confirmed is all.

If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about [REDACTED] Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?

I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

Thanks a lot mate!!

Jenna

Sent from my iPhone

From: [Richards, Jason R.](#)
To: [REDACTED]
Subject: Re: Hi There
Date: Wednesday, August 27, 2014 10:50:27 AM

Feel free to reach out to me any time.
Take care.

Jason

----- Original Message -----

From: [REDACTED]
To: Richards, Jason R.
Sent: Wed Aug 27 10:46:50 2014
Subject: Re: Hi There

Thank you Jason. I hope all has been well for you and yours!

All the best, I won't bother you again.

Jenna

Sent from my iPhone

> On Aug 27, 2014, at 10:44 AM, "Richards, Jason R." <Jason.Richards2@ic.fbi.gov> wrote:
>
> Hi Jenna,
>
> My suggestion is for you to do a Freedom of Information Act request (www.foia.gov) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of [REDACTED]. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps.
>
> Best wishes,
>
> Jason
>
> -----Original Message-----
> **From:** [REDACTED]
> **Sent:** Wednesday, August 27, 2014 9:49 AM
> **To:** Richards, Jason R.
> **Subject:** Hi There
>
> G'day Jason,
>
> I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an era, just need a couple dates confirmed is all.
>
> If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about [REDACTED]? Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?
>
> I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

>
> Thanks a lot mate!!
>
> Jenna
>
> Sent from my iPhone

From: [REDACTED]
To: Jason.Richards2@ic.fbi.gov
Subject: Virginia Roberts(Jane doe 102)
Date: Tuesday, April 15, 2014 9:50:31 AM

Hi Jason,

Long time, no talk. I hope all has been well for you and yours!! I am now back in the USA, not too many people know about that and I'd like to keep it that way as my case against Jeffrey Epstein has intensified!! I am here to get this BS non- prosecution agreement thrown out and speaking w Judge Paul Cassal he suggested trying to get ahold of any photos and/or video recordings released by the FBI to assist our case further in proving how much pedophilia occurred by Jeffrey and the many other monsters he obliged w underage girls. If this is a possibility please let me know so I can give you Brad Edwards(my attorney) his contact details. Many thanks for your time and I hope we should meet again.

Kindest Regards,
Virginia Roberts
Phone [REDACTED] 8

Sent from my iPhone

From: [REDACTED]
To: christina.pyror@ic.fbi.gov
Subject: Virginia Roberts re: Jeffrey Epstein Case
Date: Wednesday, April 16, 2014 1:52:05 PM

Hi Christina,

I was wondering if you remember me from Sydney Consulate, I am a victim in the investigation from the Jeffrey Epstein case and was wondering if you could tell me if I would be able to get ahold of any of the pics and/or videos that the FBI might have confiscated from any of Epstein's residences? Also can I ask if you might have any of the flight logs that include my name in them to be sent to me as well. It's all for evidential purposes and would prove a many of things to help my case.

Kindest Regards,
Virginia Roberts
[REDACTED]

Sent from my iPhone

From: sharonrikard@gmail.com on behalf of [Sharon Rikard](#)
To: [Virginia Giuffre](#)
Subject: Re: Victims Refuse Silence
Date: Saturday, March 28, 2015 9:49:55 AM

Hi Virginia,

So sorry for the late response. Our organization currently works with survivors of sex trafficking provided continuing education, life skills and counseling. We will help with transportation and their basic necessities. Our ultimate goal is a home for domestic minor sex trafficking survivors.

Our contact information is:

doorstofreedom.com
infor@doorstofreedom.com
[843-817-0740](tel:843-817-0740)

I am going to forward your information to our Attorney Generals office as Marie Sazehn has compiled a list of organizations in our state of people/organizations and their involvement in helping survivors.

Thanks for all you are doing to help others!

Blessings,
Sharon Rikard

From: [Virginia Giuffre](#)
To: sharon@doorstofreedom.com
Subject: Victims Refuse Silence
Date: Wednesday, March 18, 2015 12:19:06 PM

Hi Sharon,

This is Virginia, we spoke earlier and I just wanted to say thank you for your time and what your doing to help the victims in your area. The mentality has to be changed!! Good luck!!

Kindest Regards,
Virginia Roberts

Sent from my iPhone

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
1	2/12/2015 6:14	Virginia Giuffre	smccawley@bsfllp.com		Email chain with Giuffre, Edwards and Cassell re attorney impressions and legal advice relating to deposition testimony	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
2	2/16/2015 1:05	StanPottinger@aol.com	Smccawley@BSFLLP.com,brad@pathtojustice.com, [REDACTED]		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
3	2/16/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
4	2/16/2015 16:15	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
5	2/16/2015 16:24	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
6	2/16/2015 16:24	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
7	2/21/2015 16:45	Sigrid McCawley	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu, [REDACTED]	Smccawley@BSFLLP.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
8	2/21/2015 16:58	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorney	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
9	2/21/2015 17:05	Brad Edwards	Smccawley@BSFLLP.com	StanPottinger@aol.com,cassellp@law.utah.edu, [REDACTED]	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
10	2/21/2015 17:10	Sigrid McCawley	[REDACTED]		Discussion of evidence among client and attorney	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
11	2/21/2015 17:16	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
12	2/23/2015 14:21	Sigrid McCawley	[REDACTED]	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
13	2/23/2015 14:29	StanPottinger@aol.com	Smccawley@BSFLLP.com,ro [REDACTED]	brad@pathtojustice.com,cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
14	2/23/2015 16:01	Virginia Giuffre	Smccawley@BSFLLP.com	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
15	2/24/2015 17:51	Sigrid McCawley	[REDACTED]		Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
16					Attached case research	AC Privilege and Work Product/joint defense/common interest	Withheld	14	rtf
17	2/26/2015 12:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
18					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	1	jfif
19	2/28/2015 17:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email with Giuffre, McCawley, Edwards and Henderson re discussion of draft statement	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
20	3/13/2015 17:29	Stan Pottinger	[REDACTED]	Smccawley@BSFLLP.com,brad@palthtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
21	3/13/2015 17:49	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, McCawley and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
22	3/13/2015 17:56	StanPottinger@aol.com	[REDACTED]	Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
23	3/13/2015 18:00	Brad Edwards	StanPottinger@aol.com, [REDACTED]	Smccawley@BSFLLP.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
24	3/13/2015 18:24	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
25	3/13/2015 18:25	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
26	3/13/2015 21:53	Virginia Giuffre	brad@pathtojustice.com	Smccawley@BSFLLP.com,StanPottinger@aol.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
27	3/13/2015 23:38	Brad Edwards	[REDACTED]		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
28	3/13/2015 23:40	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
29	3/17/2015 15:20	Virginia Giuffre	Smccawley@BSFLLP.com,brad@pathtojustice.com,stanpottinger@aol.com		Providing information to assist in legal advice re potential legal action, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
30	3/17/2015 18:40	Stan	Smccawley@BSFLLP.com,brad@pathtojustice.com, [REDACTED]		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
31	3/17/2015 19:42	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
32	3/20/2015 15:43	Sigrid McCawley	brad@pathtojustice.com, [REDACTED] tanpottinger@aol.com	aortiz@BSFLLP.com,brittany@pathtojustice.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
33	3/20/2015 15:57	Sigrid McCawley	[REDACTED]		Providing legal advice re potential deposition	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
34	3/24/2015 21:19	Sigrid McCawley	[REDACTED]	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
35	3/24/2015 21:21	Virginia Giuffre	Smccawley@BSFLLP.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
36	3/24/2015 21:36	Andres Ortiz	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
37	3/24/2015 22:21	Virginia Giuffre	aortiz@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	3	msg
38	3/26/2015 2:00	Sigrid McCawley		Smccawley@BSFLLP.com,StanPottinger@aol.com,brad@pathtojustice.com,brittany@pathtojustice.com,eperez@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
39	3/26/2015 2:21	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
40	3/26/2015 2:22	Sigrid McCawley			Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
41	3/26/2015 3:00	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
42	4/1/2015 21:32	Virginia Giuffre	Smccawley@BSFLLP.com		Giuffre conveying information sought by attorney to assist in legal advice with attachments	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
43	4/2/2015 7:01	Brittany Henderson	[REDACTED]	eperez@BSFLLP.com	Providing draft legal document for client review, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
44					Attached Draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	15	pdf
45	4/3/2015 15:32	Brittany Henderson	[REDACTED]	brad@pathtojustice.com,eperez@BSFLLP.com	Email chain with Giuffre, Henderson, Edwards and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
46					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest		15	pdf

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
47	4/8/2015 20:34	Virginia Giuffre	Smccawley@BSFLLP.com		Seeking legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
48	4/9/2015 3:23	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re advice re legal filings, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
49	4/9/2015 7:16	Sigrid McCawley	StanPottinger@aol.com,brad@pathtojustice.com, [REDACTED]	brittany@pathtojustice.com,sperkins@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
50	4/9/2015 9:26	Brad Edwards	Smccawley@BSFLLP.com	[REDACTED]	Email chain with Giuffre, Edwards, and McCawley re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
51	4/9/2015 9:33	Sigrid McCawley	[REDACTED]		Email chain with Giuffre and McCawley re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
52	4/9/2015 12:46	Sigrid McCawley	[REDACTED]		Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
53					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	14	docx
54					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	12	docx
55					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	2	docx
56	4/10/2015 14:59	Sigrig McCawley	[REDACTED]	StanPottinger@aol.com,brad@pathjustice.com	Providing legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
57	4/10/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Regarding legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
58	4/10/2015 17:31	Sigrig McCawley	[REDACTED]	StanPottinger@aol.com,brad@pathjustice.com,brittany@pathjustice.com,eperez@BSFLLP.com	Email chain with Giuffre, McCawley, Henderson, Edwards, Pottinger and legal assistant re legal documents, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
59					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	3	pdf

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
60					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	21	pdf
61	4/10/2015 17:40	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
62	4/10/2015 19:10	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
63	4/10/2015 19:28	Sigrid McCawley			Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
64	4/10/2015 19:33	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
65	4/10/2015 20:03	Sigrid McCawley			Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
66	4/10/2015 20:04	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
67	4/10/2015 20:04	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
68	4/10/2015 23:46	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley legal assistant re seeking and providing information sought by attorney to assist in providing legal advice, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
69	4/13/2015 13:52	Sigrid McCawley	[REDACTED]	StanPottinger@aol.com,brad@pathtojustice.com	Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding potential public statements	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
70	4/13/2015 13:56	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
71	4/14/2015 23:38	Brad Edwards	Smccawley@BSFLLP.com,brittany@pathtojustice.com, [REDACTED] stan pottinger@aol.com		Providing legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
72	4/16/2015 11:14	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
73	4/16/2015 11:47	Sigrid McCawley	[REDACTED]		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
74	4/24/2015 19:22	Sigrid McCawley	[REDACTED]		Providing legal advice re records retention, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
75					Attached letter providing legal advice re document retention	Attorney Client/joint defense/common interest/work product	Withheld	2	pdf
76	4/24/2015 19:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding potential deposition	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
77	4/27/2015 21:20	Brad Edwards	[REDACTED]	Smccawley@BSFLLP.com	Seeking information to assist in providing legal advice	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
78	4/30/2015 6:42	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@pathtojustice.com	Legal documents provided to assist in providing legal advice	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
79	4/30/2015 7:02	Brittany Henderson			Email chain with Giuffre, Henderson and paralegal re seeking and providing information to assist in providing legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
80	4/30/2015 7:05	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
81	5/4/2015 20:04	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
82	5/11/2015 18:20	Sigrid McCawley		Smccawley@BSFLLP.com	Email chain with McCawley, Giuffre, Edwards, Pottinger, Henderson and Paralegal re seeking and providing information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
83	5/11/2015 18:34	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
84	5/11/2015 18:40	Sigrid McCawley			Email chain with Giuffre and McCawley re case research, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
85	5/11/2015 18:45	Sigrid McCawley	brad@pathtojustice.com, [REDACTED]		Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
86	5/11/2015 18:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re seeking information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
87	5/11/2015 18:56	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
88	5/17/2015 22:37	Sigrid McCawley	[REDACTED]		Providing litigation documents to client, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	3	msg
89					Attached draft legal agreement	AC Privilege and Work Product/joint defense/common interest	Withheld	10	pdf
90	5/17/2015 22:40	Sigrid McCawley	[REDACTED]		Providing legal advice re legal agreement, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
91	5/18/2015 18:40	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of confidential agreement, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
92					Attached confidential agreement page	Attorney Client/joint defense/common interest/work product	Withheld	1	jfif
93					Attached confidential agreement page	Attorney Client/joint defense/common interest/work product	Withheld	1	jfif
94	6/5/2015 19:16	Sigrid McCawley	[REDACTED]		Conveying attorney mental impression regarding hearing	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
95	6/6/2015 17:20	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re attorney mental impression regarding hearing	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
96	6/25/2015 2:26	Sigrid McCawley	[REDACTED]		Providing advice re status and strategy of ongoing legal matters	Attorney Client/joint defense/common interest/work product	Withheld	6	msg
97	7/17/2015 14:19	Sigrid McCawley	[REDACTED]	eperez@BSFLLP.com	Discussion with S. McCawley regarding file related to representation by B. Josefsberg	Attorney Client/joint defense/common interest/work product	Withheld	4	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
98	7/27/2015 21:53	Virginia Giuffre	Smccawley@BSFLLP.com		Providing information to assist in legal advice re potential litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
99	7/29/2015 19:45	Sigrid McCawley	[REDACTED]	StanPottinger@aol.com	Conveying legal advice on media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
100	8/5/2015 19:51	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley and paralegals re information sought to assist in providing legal advice	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
101	8/6/2015 2:14	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
102	8/6/2015 2:45	Sigrid McCawley	[REDACTED]	brad@pathtojustice.com	Email chain with Giuffre, McCawley, legal intern, Edwards and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
103	8/6/2015 2:55	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
104	8/6/2015 3:48	Sigrid McCawley	[REDACTED]	Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
105	8/6/2015 3:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
106	9/1/2015 18:54	Sigrid McCawley	[REDACTED]	brad@pathtojustice.com,brittany@pathtojustice.com	Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
107	9/7/2015 18:24	Virginia Giuffre	brad@pathtojustice.com,smccawley@bsfllp.com,stanpottinger@aol.com		Providing information sought by attorneys to provide legal advice, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
108					Attached Information sought by attorneys to provide legal advice	AC Privilege and Work Product/joint defense/common interest	Withheld	4	docx
109	9/7/2015 18:58	Sigrid McCawley	brad@pathtojustice.com,[REDACTED],stanpottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re collection of information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
110	9/15/2015 21:58	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
111	9/15/2015 22:04	Sigrid McCawley	[REDACTED]		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
112	9/15/2015 22:07	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
113	9/20/2015 12:15	Sigrid McCawley	[REDACTED]	brad@pathtojustice.com	Conveying information about potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
114	9/20/2015 14:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
115	9/20/2015 19:16	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
116	9/20/2015 19:29	Sigrid McCawley	[REDACTED]		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
117	9/20/2015 19:30	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
118	9/21/2015 14:48	Sigrid McCawley	[REDACTED]		Communication re initiation of lawsuit, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
119					Attached draft legal document relating to litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	12	pdf
120					Attached draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	pdf
121					Attached draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	pdf
122					Attached draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	3	pdf

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
123	9/21/2015 14:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
125	Emails, letters, and other communications from 2011 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson (and other), Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Jane Doe #1 and Jane Doe #2 v. United States ("CVRA case"), Case no. 08-80736-CIV-Marra, pending in the Southern District of Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the CVRA case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the CVRA case, communications sending or attaching attorney work product related to the CVRA case, and/or communications sending or attaching client revisions to attorney work product related to the CVRA case, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
126	Emails, letters, and other communications from 9/21/15 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Giuffre v. Maxwell ("Maxwell case"), 15-cv-07433-RWS, pending in the Southern District of New York, since the date of filing, September 21, 2015. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Maxwell case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Maxwell case, communications sending or attaching attorney work product related to the Maxwell case, and/or communications sending or attaching client revisions to attorney work product related to the Maxwell case, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
127	Emails, letters, and other communications from January 2015 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: <i>Bradley Edwards and Paul Cassell v. [REDACTED]</i> pending in the Seventeenth Judicial Circuit, Broward County, Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the [REDACTED] case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the [REDACTED] case, communications sending or attaching attorney work product related to the [REDACTED] case, and/or communications sending or attaching client revisions to attorney work product related to the [REDACTED] case, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
128	Emails, letters, and other communications from 2009 - Present	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: <i>Jane Doe No. 102 v. Jeffrey Epstein</i> ("Epstein case"), Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida). Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Epstein case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Epstein case, communications sending or attaching attorney work product related to the Epstein case, and/or communications sending or attaching client revisions to attorney work product related to the Epstein case, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	
129	6/10/2015	Virginia Giuffre	[REDACTED]		Email chain with Giuffre and McCawley seeking information to assist with attorney advice.	Attorney Client	Withheld	2	msg
130					Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	26	pdf
131	4/30/2015	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@palthtojustice.com,[REDACTED]	Communication re VRS registrations	AC Privilege and Work Product	Withheld	1	msg
132	4/29/2015	Andres Ortiz	bh699@nova.edu	Smccawley@BSFLLP.com,brad@palthtojustice.com,garvin@lclark.edu,[REDACTED]	Email chain with McCawley, Edwards, Garvin, Henderson, Giuffre and BSF staff re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg
133	4/29/2015	brittany henderson	aortiz@BSFLLP.com	Smccawley@BSFLLP.com,brad@palthtojustice.com,garvin@lclark.edu,[REDACTED]	Communication re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
134	4/17/2015	Paul Cassell	brad@pathtojustice.com	Smccawley@BSFLLP.com,brittany@pathtojustice.com,eperez@BSFLLP.com [REDACTED]	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	5	msg
135	4/17/2015	Sigrid McCawley	brad@pathtojustice.com,cassellp@law.utah.edu	brittany@pathtojustice.com,eperez@BSFLLP.com, [REDACTED]	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	4	msg
136	4/17/2015	Brad Edwards	cassellp@law.utah.edu	Smccawley@BSFLLP.com,brittany@pathtojustice.com,eperez@BSFLLP.com [REDACTED]	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	4	msg
137	2/26/2015	Sigrid McCawley	[REDACTED]		Email chain with Giuffre and McCawley re non-testifying expert.	Attorney Client	Withheld	1	msg
138	2/26/2015	Sigrid McCawley	[REDACTED]		Communication re non-testifying expert.	Attorney Client	Withheld	1	msg
139	2/11/2016	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
140	2/11/2016	Sigrid McCawley	StanPottinger@aol.com [REDACTED]	Lcarlsen@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
141	2/11/2016	StanPottinger@aol.com	[REDACTED]	Lcarlsen@BSFLLP.com,Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
142	2/9/2016	StanPottinger@aol.com	[REDACTED]		Email chain with Giuffre and Pottinger re media communications.	Attorney Client	Redacted	2	msg
143					Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	26	pdf
144					Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	23	docx
145	6/10/2015	Virginia Giuffre	[REDACTED]		Email chain with Giuffre and McCawley re ongoing litigation.	Attorney Client	Withheld	2	msg
146	4/29/2015	Virginia Giuffre	aortiz@BSFLLP.com	Smccawley@BSFLLP.com,bh699@nova.edu,brad@pathtojustice.com,garvin@lclark.edu	Email chain with Henderson, McCawley, Edwards, Garvin and BSF staff re VRS communications.	Attorney Client	Withheld	2	msg
147	4/10/2015	Virginia Giuffre	[REDACTED]		Email chain with [REDACTED] Giuffre, McCawley, and BSF staff re legal advice re VRS registrations.	Attorney Client	Withheld	2	msg
148	2/26/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email confirming legal advice re non-testifying expert.	Attorney Client	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre and Pottinger re media communications	Attorney Client	Redacted	3	msg
150	2/11/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.	AC Privilege and Work Product	Withheld	1	msg
152	Emails, letters, and other communications from January 2015 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). This categorical entry is regarding correspondence re potential legal action against entities and individuals. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to potential law suits, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the law suits, communications sending or attaching attorney work product related to potential lawsuits, and/or communications sending or attaching client revisions to attorney work product related to potential lawsuits, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K overlapping with other cases	

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
153	Email and letter communications	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). This categorical entry is regarding correspondence re the currently ongoing criminal investigation of Defendant and others.	Public Interest	Withheld	approx. 57 documents	
154	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
155	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
156	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE #3 AND JANE DOE #4’S MOTION PURSUANT TO RULE 21 FOR
JOINDER IN ACTION**

COME NOW Jane Doe #3 and Jane Doe #4 (also referred to as “the new victims”), by and through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as “the current victims”). The new victims have suffered the same violations of their rights under the Crime Victims’ Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may “at any time” add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.¹

¹ As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this

FACTUAL BACKGROUND

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (inter alia) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

fashion. Counsel for the new victims have made their true identities known to the Government.

Jane Doe #3's Circumstances

As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by Epstein. The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA. If allowed to join this action, Jane Doe #3 would prove the following:

In 1999, Jane Doe #3 was approached by Ghislaine Maxwell, one of the main women whom Epstein used to procure under-aged girls for sexual activities and a primary co-conspirator in his sexual abuse and sex trafficking scheme. In fact, it became known to the government that Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3. Maxwell persuaded Jane Doe #3 (who was then fifteen years old) to come to Epstein's mansion in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children (including Jane Doe #1 and Jane Doe #2). When Jane Doe #3 began giving Epstein a "massage," Epstein and Maxwell turned it into a sexual encounter, as they had done with many other victims. Epstein then became enamored with Jane Doe #3, and with the assistance of Maxwell converted her into what is commonly referred to as a "sex slave." Epstein kept Jane Doe #3 as his sex slave from about 1999 through 2002, when she managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years. From 1999 through 2002, Epstein frequently sexually abused Jane Doe #3, not only in West Palm Beach, but also in New York, New Mexico, the U.S. Virgin Islands, in international airspace on his Epstein's private planes, and elsewhere.

Epstein also sexually trafficked the then-minor Jane Doe, making her available for sex to politically-connected and financially-powerful people. Epstein's purposes in "lending" Jane Doe

(along with other young girls) to such powerful people were to ingratiate himself with them for business, personal, political, and financial gain, as well as to obtain potential blackmail information.

One such powerful individual that Epstein forced then-minor Jane Doe #3 to have sexual relations with was [REDACTED], a close friend of Epstein's [REDACTED]. Epstein required Jane Doe #3 to have sexual relations with [REDACTED] on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands. In addition to being a participant in the abuse of Jane Doe #3 and other minors, [REDACTED] was an eye-witness to the sexual abuse of many other minors by Epstein and several of Epstein's co-conspirators. [REDACTED] would later play a significant role in negotiating the NPA on Epstein's behalf. Indeed, [REDACTED] helped negotiate an agreement that provided immunity from federal prosecution in the Southern District of Florida not only to Epstein, but also to "any potential co-conspirators of Epstein." NPA at 5. Thus, [REDACTED] helped negotiate an agreement with a provision that provided protection for himself against criminal prosecution in Florida for sexually abusing Jane Doe #3. Because this broad immunity would have been controversial if disclosed, [REDACTED] (along with other members of Epstein's defense team) and the Government tried to keep the immunity provision secret from all of Epstein's victims and the general public, even though such secrecy violated the Crime Victims' Rights Act.

Ghislaine Maxwell was another person in Epstein's inner circle and a co-conspirator in Epstein's sexual abuse. She was someone who consequently also appreciated the immunity granted by the NPA for the crimes she committed in Florida. In addition to participating in the

sexual abuse of Jane Doe #3 and others, Maxwell also took numerous sexually explicit pictures of underage girls involved in sexual activities, including Jane Doe #3. She shared these photographs (which constituted child pornography under applicable federal laws) with Epstein. The Government is apparently aware of, and in certain instances possesses some of these photographs.

Perhaps even more important to her role in Epstein's sexual abuse ring, Maxwell had direct connections to other powerful individuals with whom she could connect Epstein. For instance, one such powerful individual Epstein forced Jane Doe #3 to have sexual relations with [REDACTED] Jane Doe #3 was forced to have sexual relations with [REDACTED] when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell's apartment), in New York, and on Epstein's private island in the U.S. Virgin Islands (in an orgy with numerous other under-aged girls). Epstein instructed Jane Doe #3 that she was to give [REDACTED] whatever he demanded and required Jane Doe #3 to report back to him on the details of the sexual abuse. Maxwell facilitated [REDACTED] acts of sexual abuse by acting as a "madame" for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other young girls) for sexual purposes.

Another person in Epstein's inner circle of friends (who becomes apparent with almost no investigative effort) is [REDACTED]. Epstein sexually trafficked Jane Doe #3 to [REDACTED] many times. [REDACTED] was another of Epstein's closest friends and a regular traveling companion, who had many contacts with young girls throughout the world. [REDACTED] has been a model scout for various modeling agencies for many years and apparently was able to get U.S.

passports for young girls to “work” as models. He would bring young girls (ranging to ages as young as twelve) to the United States for sexual purposes and farm them out to his friends, especially Epstein. ██████ would offer the girls “modeling” jobs. Many of the girls came from poor countries or impoverished backgrounds, and he lured them in with a promise of making good money. Epstein forced Jane Doe #3 to observe him, ██████ and Maxwell engage in illegal sexual acts with dozens of underage girls. Epstein also forced Jane Doe #3 to have sex with ██████ on numerous occasions, at places including Epstein’s mansion in West Palm Beach, Little St. James Island in the U.S. Virgin Islands (many including orgies that were comprised of other underage girls), New York City, New Mexico, Paris, the south of France, and California.

Epstein also trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders. Epstein required Jane Doe #3 to describe the events that she had with these men so that he could potentially blackmail them.

The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3’s relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 all in violation of her rights under the CVRA to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make \$300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: December 30, 2014

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on December 30, 2014, on the following using the Court's CM/ECF system:

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Attorneys for the Government

/s/ Bradley J. Edwards

EXHIBIT H

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
2 IN AND FOR BROWARD COUNTY, FLORIDA
3 CASE NO. 15-000072

4 BRADLEY J. EDWARDS and PAUL G.
5 CASSELL,

6 Plaintiffs,

7 - vs -

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8 ALAN M. DERSHOWITZ,

9 Defendant.

/

10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11

12 Saturday, January 16, 2016
13 9:07 a.m. - 2:48 p.m.

14

15 401 East Las Olas Blvd., Suite 1200
16 Fort Lauderdale, Florida 33301

17

18

19

20 Reported By:

21 Deborah A. Harris, Court Reporter
22 Notary Public, State of Florida
23 Phone - 305.651.0706

24

25

Job No. J0277789

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1 raises. Do you understand that?

2 MS. MCCAWLEY: I do. So let's take a
3 break. It's a moment to take a break and I'll
4 discuss with these folks and we'll come back.

5 THE VIDEOGRAPHER: Going off video record
6 2:25 p.m.

7 (A recess was taken.)

8 THE VIDEOGRAPHER: We're now back on video
9 record 2:32 p.m.

10 SPECIAL MASTER: Just for the record, [REDACTED]
11 [REDACTED] through counsel examined the witness
12 for four hours and seven minutes and there was a
13 request and it appears to be in agreement to
14 allow.

15 MR. SCOTT: No agreement.

16 SPECIAL MASTER: Hang on one second. Hang
17 on. Between Mr. Scarola and Ms. McCawley, to
18 allow Mr. Scarola a couple questions on
19 examination on cross and then my ruling is going
20 to be as follows: You can go ahead and ask
21 whatever questions you want, Mr. Scarola, at which
22 time I will give opportunity for re-direct based
23 upon the topics that you've raised.

24 MR. SCAROLA: With the understanding that
25 re-direct is going to be limited to the area of

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1 inquiry that I am about to conduct. I am about to
2 conduct an inquiry.

3 SPECIAL MASTER: That is the understanding.
4 My understanding of my ruling, I know that [REDACTED].
5 [REDACTED] team has objected to that. I also
6 understand that there might be -- this is no
7 impact or their right or anybody else's right to
8 go back to Judge Lynch and ask for more time from
9 this witness based upon my ruling or my reading of
10 the original order.

11 MS. MCCAWLEY: And there's also the motion
12 to strike the testimony that you allowed over the
13 ruling.

14 SPECIAL MASTER: And there's a series of
15 those things that might need to be cleaned up in a
16 subsequent sitting.

17 MR. SCOTT: It's my understanding this is
18 going to be limited to five minutes or less; is
19 that correct?

20 MR. SCAROLA: That's what I anticipate.

21 MR. SCOTT: Over our objection, okay.

22 SPECIAL MASTER: Let's rock and roll.

23 CROSS-EXAMINATION

24 BY MR. SCAROLA:

25 Q. Virginia, has Brad Edwards ever pressured

1 you or encouraged you in any way whatsoever at any time
2 and under any circumstances to provide false information
3 about [REDACTED]

4 A. Never.

5 Q. Has Brad Edwards ever pressured you or
6 encouraged you in any way or under any circumstances at
7 any time to provide false information about Jeffrey
8 Epstein?

9 A. Never.

10 Q. Has he ever pressured you or encouraged you
11 at any time or in any way, under any circumstances to
12 provide false information about anyone or anything?

13 A. Never.

14 Q. Has Paul Cassell ever pressured you or
15 encouraged you in any way, at any time, under any
16 circumstances to provide false information about [REDACTED]

17 [REDACTED]

18 A. Never.

19 Q. Has he ever pressured or encouraged you in
20 any way at any time, under any circumstances to provide
21 false information about Jeffrey Epstein?

22 A. Never.

23 MS. BORJA: Objection. I couldn't follow
24 who he was.

25 BY MR. SCAROLA:

1 Q. Mr. Cassell, Professor Cassell? You
2 understood that I was asking you that question about
3 Professor Cassell, right?

4 A. And he's never pressured me or encouraged
5 me in any way to talk --

6 MS. MCCAWLEY: I don't want you to go into
7 discussions with them if you're saying something
8 didn't happen --

9 SPECIAL MASTER: Just --

10 MS. MCCAWLEY: I'm preserving privilege. I
11 just want to make sure if something didn't happen
12 she can say that.

13 BY MR. SCAROLA:

14 Q. Has Professor Cassell ever pressured you or
15 encouraged you in any way to provide false information
16 about anyone or anything at any time?

17 A. Never.

18 Q. Apart from any efforts made by Jeffrey
19 Epstein or agents on behalf of Jeffrey Epstein to silence
20 you or to have you refrain from providing true and
21 accurate information about the interactions that you had
22 with Jeffrey Epstein and others to whom you were
23 trafficked by Jeffrey Epstein, has anyone apart from that
24 circumstance pressured you or encouraged you to provide
25 false information about any of the topics that were

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1 covered during the course of your examination?

2 MS. BORJA: Objection. Objection to the
3 form. Leading, assumes facts not in evidence,
4 compound, misleading.

5 SPECIAL MASTER: Your form objection will
6 be reserved. You can answer.

7 A. No.

8 MR. SCAROLA: Thank you. I don't have any
9 further questions.

10 MR. SCOTT: Judge, excuse me, none of this
11 was covered on direct examination so we move to
12 exclude and strike the entire testimony because
13 none of this was covered on our direct. But we
14 would like to request a two-minute recess because
15 these are completely new areas.

16 SPECIAL MASTER: I'll grant your two-minute
17 recess.

18 THE VIDEOGRAPHER: Going off video record
19 2:37 p.m.

20 (A recess was taken.)

21 THE VIDEOGRAPHER: We are now back on video
22 record 2:41 p.m.

23 MR. SCAROLA: Could we have a reading how
24 much time is used in my examination.

25 SPECIAL MASTER: That's going to be

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1 irrelevant at this point, but you can ask.

2 THE VIDEOGRAPHER: It's going to be about
3 eight minutes, seven minutes of change.

4 MR. SCAROLA: Hard for me to believe that
5 but if the counter says what the counter says.

6 SPECIAL MASTER: The overtime got three
7 minutes, let's go.

8 REDIRECT EXAMINATION

9 BY MS. BORJA:

10 Q. Before you were scheduled here under oath
11 today by Mr. Scarola, did you talk to him in the break
12 before that?

13 MS. MCCAWLEY: Objection to the extent you
14 discussed privileged information with your lawyers
15 you don't have to reveal.

16 BY MS. BORJA:

17 Q. I'm asking what she talked about with Mr.
18 Scott?

19 MS. MCCAWLEY: She's in a joint defense
20 agreement with Mr. Scarola.

21 BY MS. BORJA:

22 Q. Are you in a joint defense agreement with
23 Mr. Scarola?

24 MR. SCAROLA: I will tell you that there is
25 a joint defense, a common interest privilege

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1 agreement between the witness and my clients, yes.

2 SPECIAL MASTER: Are you asserting that
3 privilege then?

4 MR. SCAROLA: Yes, we are asserting that
5 privilege and instructing the witness not to
6 answer on the basis of the privilege that exists
7 for Bradley Edwards and Professor Cassell.

8 SPECIAL MASTER: So with that I'm going to
9 grant the motion similar to what I did the other
10 day when [REDACTED] was testifying and under
11 the reservation that that can be dealt with later
12 in front of the judge or in front of me, whichever
13 you choose.

14 BY MS. BORJA:

15 Q. Now, I understand from your testimony that
16 Mr. Edwards did not pressure you to give false
17 information about this matter, is that fair?

18 A. That's fair.

19 Q. Tell me everything that Mr. Edwards told
20 you about this matter?

21 MS. MCCAWLEY: Objection, that's privileged
22 and she has not waived any privilege. She's not
23 here testifying as to what she discussed with her
24 lawyers.

25 SPECIAL MASTER: You know, it's an

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1 interesting point. I'm going to grant your motion
2 for privilege, but I'm going to suggest to you
3 that there might be a strong argument to be made
4 that those questions opened some of the door. I'm
5 going to let the judge decide that. But you can
6 go ahead, ask the questions, we'll put it on the
7 record for later determination, and it's going to
8 force, to be blunt, this among other things may
9 force the witness to come back and complete the
10 deposition. Just let's be aware of that.

11 MS. BORJA: And I can't make a proffer to
12 all of my questions because some of them will
13 depend on this witness' answers.

14 SPECIAL MASTER: I'm aware of that.

15 MS. BORJA: I want the record to be clear
16 that although I'm being asked for a proffer, I'm
17 constrained based on my inability to follow up.

18 SPECIAL MASTER: I understand that, but I'm
19 sure that you have a couple questions that you'd
20 like to proffer to give the record an idea of
21 where you might have gone without restraint to
22 what the answer might be and then a subsequent
23 question might lead from the answer, I understand
24 that.

25 BY MS. BORJA:

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1 Q. Did Mr. Edwards ever suggest to you
2 anything regarding [REDACTED]

3 MS. MCCAWLEY: Objection. Hang on, I'm
4 objecting. She's making a proffer and I need to
5 make my objection on the record. Do not answer.
6 Objection, attorney/client privilege.

7 SPECIAL MASTER: So I'm going to grant
8 within the reservation it be brought back later.

9 BY MS. BORJA:

10 Q. Did Paul Cassell ever tell you anything
11 about the topics that were covered in today's deposition?

12 MS. MCCAWLEY: Objection, attorney/client
13 privilege.

14 SPECIAL MASTER: Same ruling.

15 BY MS. BORJA:

16 Q. Did anyone from Boise, Schiller ever tell
17 you anything about the topics that were covered in
18 today's deposition?

19 MS. MCCAWLEY: Objection, privileged work
20 product.

21 SPECIAL MASTER: Same ruling.

22 BY MS. BORJA:

23 Q. Did Mr. Scarola ever tell you anything
24 about the topics that were covered in today's deposition?

25 MS. MCCAWLEY: Objection, attorney/client

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