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2 Q. Did you learn whether your
3 perception was correct?

4 MR. PAGLIUCA: Same objection.

5 A. It was younger. Yes, I did.

6 Q. How old was this girl?

7 A. 15 years old.

8 Q. What happens next when Ghislaine
9 Maxwell and Jeffrey Epstein and a 15-year-old
10 girl walk into Eva Anderson's home?

11 MR. PAGLIUCA: Object to the form.
12 Foundation.

13 A. They proceed into the dining room
14 area, which is across from the living room
15 area. I go into the kitchen and I hear a
16 conversation start. Very muffled, I could
17 not hear any particulars about the
18 conversation whatsoever.

19 My wife and I are in the kitchen
20 preparing the evening meal. Eva brings the
21 young girl into the kitchen. In the kitchen,
22 there is an island with three barstools. Eva
23 instructs the young girl to sit to the
24 furthest barstool on the right.

25 Q. Describe for me what the girl

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2 looked like, including her demeanor and
3 anything else you remember about her when she
4 walks into the kitchen.

5 A. Very attractive, beautiful young
6 girl. Makeup, very put together, casual
7 dress. But she seemed to be upset, maybe
8 distraught, and she was shaking, and as she
9 sat down, she sat down and sat in the stool
10 exactly the way the girls that I mentioned to
11 you sat at Jeffrey's house, with no
12 expression and with their head down. But we
13 could tell that she was very nervous.

14 Q. What do you mean by distraught and
15 shaking, what do you mean by that?

16 A. Shaking, I mean literally
17 quivering.

18 Q. What happens next?

19 A. We were, again, the absurdity,
20 never introduced. Like you would walk into a
21 room and say this is -- so my wife and I are
22 in the kitchen and this young girl is sitting
23 there. It was a very uncomfortable moment.
24 I look at my wife. And so I want to ease the
25 moment, and so I introduced myself and I

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2 introduced my wife, and she doesn't really
3 respond.

4 And I asked her, are you okay? And
5 she doesn't really respond. Nothing verbal,
6 no cues, her head is still down. I ask her
7 if she would like some water, tissue,
8 anything, and she basically doesn't respond.

9 Q. You ask her for a tissue?

10 A. If she would like a tissue or some
11 water at the time.

12 Q. Was she crying at the time?

13 A. My perception, she was on the verge
14 of crying. And I'm trying to loosen the
15 situation every way I know how, so the only
16 way I knew how, and I thought maybe this will
17 comfort her, I said oh, by the way, do you
18 work for Jeffrey.

19 And she says that, I guess kind of
20 made her feel comfortable, because maybe it
21 was that comment or my persistence, and she
22 said yes. So I said, what do you do? And
23 she says I'm Jeffrey's executive assistant,
24 personal assistant. Which, from looking at
25 her, just didn't seem to suit.

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2 And I blurted out: You're his
3 executive personal assistant? What do you
4 do? And she says I was hired as his
5 executive personal assistant. I schedule his
6 appointments.

7 And I'm shocked, and I blurt out:
8 You seem quite young, how did you get a job?
9 How old are you? And she says to me, point
10 blank: I'm 15 years old.

11 And I said to her: You're 15 years
12 old and you have a position like that? At
13 that point she just breaks down hysterically,
14 so I feel like I just said something wrong,
15 and she will not stop crying. My wife and I
16 were at a loss for words, and I keep on
17 trying to console her, and nothing I was
18 saying, are you all right, do you need a
19 tissue, do you need water, consoles her.

20 And then in a state of shock, she
21 just lets it rip, and what she told me was
22 just unbelievable.

23 Q. What did she say?

24 MR. PAGLIUCA: Object to the form
25 and foundation.

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2 A. She proceeds to tell my wife and I
3 that, and this is not -- this is blurting
4 out, not a conversation like I'm having a
5 casual conversation. That quickly, I was on
6 an island, I was on the island and there was
7 Ghislaine, there was Sarah, she said they
8 asked me for sex, I said no.

9 And she is just rambling, and I'm
10 like what, and she said -- I asked her, I
11 said what? And she says yes, I was on the
12 island, I don't know how I got from the
13 island to here. Last afternoon or in the
14 afternoon I was on the island and now I'm
15 here. And I said do you have a -- this is
16 not making any sense to me, and I said this
17 is nuts, do you have a passport, do you have
18 a phone?

19 And she says no, and she says
20 Ghislaine took my passport. And I said what,
21 and she says Sarah took her passport and her
22 phone and gave it to Ghislaine Maxwell, and
23 at that point she said that she was
24 threatened. And I said threatened, she says
25 yes, I was threatened by Ghislaine not to

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2 discuss this.

3 And I'm just shocked. So the
4 conversation, and she is just rambling on and
5 on, again, like I said, how she got here, she
6 doesn't know how she got here. Again, I
7 asked her, did you contact your parents and
8 she says no.

9 At that point, she says I'm not
10 supposed to talk about this. I said, but I
11 said: How did you get here. I don't
12 understand. We were totally lost for words.

13 And she said that before she got
14 there, she was threatened again by Jeffrey
15 and Ghislaine not to talk about what I had
16 mentioned earlier, about -- again, the word
17 she used was sex.

18 Q. And during this time that you're
19 saying she is rambling, is her demeanor
20 continues to be what you described it?

21 A. Yes.

22 Q. Was she in fear?

23 A. Yes.

24 MR. PAGLIUCA: Object to the form
25 and foundation.

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2 Q. You could tell?

3 A. Yes.

4 MR. PAGLIUCA: Same objection.

5 A. She was shaking uncontrollably.

6 Q. What happens with this 15-year-old
7 girl next?

8 MR. PAGLIUCA: Object to the form
9 and foundation.

10 A. As she is trying to explain, and
11 I'm asking questions because I'm as feared as
12 she is at this point. We hear people
13 approach and she just shuts up.

14 Q. What happens next?

15 A. Eva comes in and tells her that she
16 will be working for Eva in the city.

17 Q. As what?

18 A. As a nanny.

19 Q. Did you see this girl again?

20 A. Yes.

21 Q. And when?

22 A. On a flight maybe a month or so to
23 Sweden.

24 Q. What was the purpose of the flight?

25 A. We were going to Sweden for the

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2 summer.

3 Q. Who was on the flight?

4 A. The Dubin family.

5 Q. As well as this girl?

6 A. Yes.

7 Q. What happens?

8 A. One thing that I forgot to mention
9 is during our initial conversation, I asked
10 her what her name was █ she said her name
11 was █

12 Q. What happened with █?

13 A. We flew to Sweden, we stopped at an
14 airport that we didn't usually stop at and
15 she got off the plane.

16 Q. Just so that I make sure I
17 understand, who it was that she says asked
18 her for sex on the island, who was that?

19 MR. PAGLIUCA: Object to the form.

20 Foundation.

21 A. She didn't specify who asked for
22 sex. She said that they asked for sex.
23 Immediately after that she put Ghislaine and
24 Sarah into the conversation.

25 Q. Taking her passport?

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2 A. Yes.

3 Q. From -- are there any other
4 incidents or occurrences that you observed
5 personally with Jeffrey Epstein and Ghislaine
6 Maxwell?

7 MR. PAGLIUCA: Object to the form
8 and foundation.

9 A. Not that I can recall.

10 Q. This last event that you described,
11 what's the timeframe when that occurred?

12 A. Late 2004, 2005.

13 Q. When did you resign your employment
14 from the Dubin family?

15 A. I think roughly October.

16 Q. Of what year?

17 A. 2005.

18 Q. Why?

19 A. My wife and I had discussed these
20 incidents, and this last one was just, we
21 couldn't deal with it.

22 Q. When you left your employment with
23 the Dubin family, did you have a job?

24 A. When we finally left, I stayed on
25 three months after my resignation, I had a

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1

2 CERTIFICATE

3

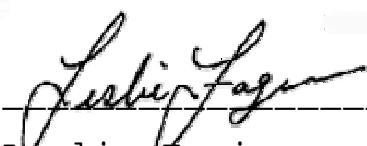
4

5 I HEREBY CERTIFY that RINALDO
6 RIZZO, was duly sworn by me and that the
7 deposition is a true record of the testimony
8 given by the witness.

9

10

11


Leslie Fagin,



Registered Professional Reporter

12

Dated: June 10, 2016

13

14

15 (The foregoing certification of
16 this transcript does not apply to any
17 reproduction of the same by any means, unless
18 under the direct control and/or supervision
19 of the certifying reporter.)

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EXHIBIT 15

(Filed Under Seal)

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x
June 3, 2016
9:07 a.m.

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

Deposition of DAVID RODGERS, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

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2 flyer person, then you would reduce it to an
3 initial?

4 MR. PAGLIUCA: Object to form and
5 foundation.

6 MR. REINHART: You can answer the
7 question.

8 You can answer the question, if you can
9 answer the question. You are allowed to answer
10 the question, if you understand the question.

11 BY MR. EDWARDS:

12 Q. I'm trying to understand your testimony.

13 Is it, if you came to know that person --

14 A. Uh-huh.

15 Q. -- as a frequent flyer passenger, you
16 would begin to reduce that person's name to an
17 initial at some point?

18 MR. PAGLIUCA: Same objection.

19 THE WITNESS: Well, we don't really have a
20 frequent flyer program that we do, so to speak.
21 A lot of times I would do it because if you
22 would write out everybody's name there is not
23 enough space, you know, to get everybody's name
24 in that little square there.

25

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2 Q. -- is that right?

3 And is that -- is Ghislaine Maxwell
4 somebody that through the years 1995 through 2013
5 was somebody who flew very frequently?

6 A. What were the years again?

7 Q. The years of this book, 1995 --

8 A. I wouldn't say through 2013. But, yes,
9 '95 through 2000 sometime. Probably, I would have
10 to go back and -- well, you can see in there.

11 Q. We will get to it.

12 A. There will be a point where you don't see
13 her much. But to say it went through 2013 would not
14 be accurate.

15 Q. Let's do it this way: The person that you
16 have reflected on numerous notations --

17 A. Yes.

18 Q. -- through here as GM --

19 A. Yes.

20 Q. -- just by the initials, are we able to
21 safely know that that is Ghislaine Maxwell?

22 A. Yes.

23 MR. PAGLIUCA: Object to form and
24 foundation.

25 MR. EDWARDS: Court reporter, did you get

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2 the answer?

3 THE REPORTER: Yes. The answer came
4 before the objection.

5 BY MR. EDWARDS:

6 Q. So on the next flight, the next day, from
7 Palm Beach to SAF. Is SAF Santa Fe?

8 A. Yes.

9 Q. And it indicates JE and GM.

10 Are we able to then know that those
11 passengers on that flight were Jeffrey Epstein and
12 Ghislaine Maxwell?

13 A. Yes.

14 MR. PAGLIUCA: Object to form and
15 foundation.

16 BY MR. EDWARDS:

17 Q. And where would you land at SAF? Is that
18 an airport?

19 A. It is an airport.

20 Q. Is it a private airport?

21 A. No. It's -- airlines go in there.

22 Q. Did Jeffrey Epstein also have a landing
23 strip at his property in New Mexico?

24 A. He did at one time.

25 Q. What would that -- do you remember what

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2 that code would be?

3 A. I don't believe there was a code.

4 Q. All right. Were there times that you
5 landed either the Gulfstream or the Boeing --

6 A. No.

7 Q. No.

8 MR. REINHART: Let him finish the question
9 before you answer.

10 THE WITNESS: Oh, I'm sorry.

11 BY MR. EDWARDS:

12 Q. Sure. We are doing fine so far. But the
13 court reporter is taking down all of our questions
14 and all of our answers. We are communicating well.

15 A. Okay.

16 Q. But when I go to read this back, we may
17 not get that.

18 A. Okay. Go ahead.

19 Q. So were there times where you landed one
20 of Jeffrey Epstein's planes on his private landing
21 strip at the New Mexico property?

22 A. Yes. But not the Gulfstream and not the
23 Boeing.

24 Q. What plane did you land on his property?

25 A. The Cessna 421. And probably a

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2 9:00, so it is 20 to 11:00 here.

3 BY MR. EDWARDS:

4 Q. So I want to go to page 41, and down to

5 December 9th. Sorry. December 11.

6 A. Okay.

7 Q. Palm Beach to Teterboro.

8 A. Yeah.

9 Q. And who are the passengers?

10 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, Virginia.

12 Q. And this appears to be the first time that
13 Virginia's name appears in the log?

14 A. Right.

15 Q. Is there a -- is there a reason why the
16 first time -- I notice that the first time on some
17 of the other passengers, you use a first and last
18 name. Is there any reason why you didn't use her
19 first and last name?

20 A. I probably didn't know her last name.

21 Q. Just didn't catch it.

22 A. Yes.

23 Q. Okay. It was not that somebody told you
24 not to use the last name?

25 A. No. No.

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2 Q. So that flight goes from Palm Beach to
3 Teterboro.

4 Can you remember whether that's the first
5 time that you flew on a plane with Virginia Roberts?

6 MR. PAGLIUCA: Object to --

7 THE WITNESS: I believe it is.

8 MR. PAGLIUCA: Object to form and
9 foundation.

10 BY MR. EDWARDS:

11 Q. Do you remember the flight?

12 A. No.

13 Q. The next flight three days later goes from
14 Teterboro to Virgin Islands with Jeffrey Epstein,
15 Ghislaine Maxwell, Adam Perry Lang, and Virginia; is
16 that right?

17 A. Yes.

18 Q. And below that, it says, "Reposition."

19 What does that mean?

20 A. We were taking the airplane with no
21 passengers to go into maintenance, or an OPS2
22 inspection.

23 Q. Okay. This is -- this is the same
24 Gulfstream, is that right?

25 A. Yes.

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2 Q. How many passengers would that Gulfstream
3 allow?

4 A. Twelve passengers, I believe.

5 Q. And do you know how Jeffrey Epstein,
6 Ghislaine Maxwell, Adam Perry Lang, and Virginia get
7 off of St. Thomas or leave the island?

8 A. No. I do not. Probably a charter, I'm
9 guessing.

10 Q. If -- who would fly the -- well, is there
11 any other plane that Jeffrey Epstein was able to
12 access back then that was a private plane?

13 MR. PAGLIUCA: Object to foundation.

14 THE WITNESS: No. At that point in time
15 we don't have the Boeing yet.

16 BY MR. EDWARDS:

17 Q. So how many airplanes did Jeffrey Epstein
18 back then?

19 A. Well, we -- I don't know if we had the 421
20 then. We may or may not have. But it wouldn't --
21 you know, you wouldn't be flying the 421 down to
22 St. Thomas with Jeffrey. It is too long of a
23 flight.

24 Q. The Cessna?

25 A. The Cessna 421, correct.

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2 Q. Okay.

3 A. But I'm not even sure we still had it at
4 this point in time.

5 Q. Yeah. It shows up on the next page. We
6 will get there.

7 A. Does it? Okay.

8 So then, yes, the answer is, yeah, we
9 still had the airplane. But we wouldn't have used
10 that.

11 Q. So is there any way of telling how Jeffrey
12 Epstein, Ghislaine Maxwell, Adam Perry Lang, and
13 Virginia were in the Virgin Islands on that, from
14 December 14th, 2000 --

15 MR. PAGLIUCA: Object to foundation.

16 BY MR. EDWARDS:

17 Q. -- based on your knowledge or your logs or
18 anything else?

19 A. No, I wouldn't have any way of knowing.

20 Q. Okay.

21 A. Because the next flight that they are on
22 was like this Palm Beach one, January 16th. So I
23 wouldn't have any idea.

24 Q. Okay. To your knowledge, did Jeffrey
25 Epstein ever fly commercially?

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2 A. He probably has. Back then at this time,
3 I'm going to say probably not. But I know that he
4 has flown commercially. But usually that would be
5 like going to Europe, maybe.

6 Q. Okay. January 16th through the 25th,
7 those flights, do you see that block that I'm
8 talking about?

9 A. Yes.

10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, and then at times Shelly Lewis, do you see
12 that?

13 A. Yes, right.

14 Q. The 25th it lands in Teterboro. And the
15 next day, on the 26th, leaves out of Teterboro with
16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
17 Virginia Roberts. This time you wrote the whole
18 name.

19 A. Right. Right.

20 Q. So when you write the full name, does that
21 signify -- that's when you may have learned her last
22 name?

23 A. Correct.

24 Q. And do you know how she -- how she got up
25 to New Jersey or New York?

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2 A. I do not. I would guess the airlines.

3 Q. At this point in time, did you know what
4 her -- what her relationship was with Jeffrey
5 Epstein or Ghislaine Maxwell?

6 MR. PAGLIUCA: Object to form.

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q. Did you -- was she a masseuse?

10 MR. PAGLIUCA: Object to foundation.

11 THE WITNESS: I -- I'm not sure what she
12 was.

13 BY MR. EDWARDS:

14 Q. Did you form any -- any belief that she
15 was a friend or a business associate or anything?

16 MR. PAGLIUCA: Object to foundation.

17 THE WITNESS: Well, I mean, we had a lot
18 of people on the airplane. And Virginia was
19 just another one of those passengers.

20 BY MR. EDWARDS:

21 Q. Okay. So on the 26th, flies to Palm
22 Beach. And then -- and then I guess the 27th --

23 A. Right.

24 Q. -- leaves from Palm Beach to the Virgin
25 Islands --

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2 A. Yes.

3 Q. -- with Jeffrey Epstein, Ghislaine
4 Maxwell, Emmy Tayler, and Virginia Roberts, right?

5 A. Yes.

6 Q. And on the 30th, you fly it back. That's
7 still the Gulfstream, right?

8 A. Yes.

9 Q. From the Virgin Islands to Palm Beach with
10 the same four passengers, correct?

11 A. Yes.

12 Q. And that's Jeffrey Epstein, Ghislaine
13 Maxwell, Emmy Tayler, and Virginia Roberts?

14 A. Correct.

15 Q. And then what happens to that plane, the
16 Gulfstream, for the next month, from February 1st
17 through March 5th?

18 A. Well, I don't know what happened to it,
19 but I'm -- from, looks like February 17th, I'm going
20 to school to get a type rating on the Boeing. And
21 I'm gone for about three weeks.

22 Q. So this is when you're doing a simulator
23 on the Boeing?

24 A. Correct.

25 Q. And getting your certification to fly the

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2 Boeing?

3 A. Yes.

4 Q. The Boeing, was that previously owned by
5 The Limited or Les Wexner?

6 A. I'm not sure of the company name,
7 officially. But probably, yes.

8 Q. Some association with him?

9 A. Some association, yes.

10 Q. Do you know who flew the Gulfstream while
11 you were doing the simulator?

12 A. Well, it would have been Larry Visoski,
13 I'm not sure who the first officer was.

14 Q. Do you know if any logs were kept of the
15 passengers' names?

16 A. While I was at school?

17 Q. Right, while you were at school.

18 A. There probably were logs, but I don't know
19 where they are.

20 Q. Have you ever spoken with Larry about
21 whether he kept names of passengers?

22 A. I don't think he does.

23 Q. Do you know where Larry Visoski flew the
24 Gulfstream for the month that you were --

25 A. No.

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2 Q. Sorry. Just let me finish my question. I
3 know I was getting it out slow.

4 -- but for the month that you were
5 training on the Boeing?

6 A. No.

7 Q. All right. So the last flight that you
8 took in the Gulfstream before you began, before you
9 flew the Cessna for a day, I guess, right, from
10 Santa Fe to DFW --

11 A. Right.

12 Q. -- February 3rd --

13 A. Yes.

14 Q. And that's the Cessna with 908GM tail
15 number?

16 A. Yes.

17 Q. The last flight that you flew on the
18 Gulfstream was the flight back from St. Thomas with
19 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
20 Virginia Roberts, right?

21 A. Uh-huh.

22 Q. And then the next time that you're on the
23 plane is -- on the Gulfstream is when?

24 A. It looks like March the 5th.

25 Q. And who are the passengers on that flight?

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2 Where is it going to?

3 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
4 Tayler, Virginia Roberts.

5 Q. And then there's notation of Gary
6 Roxborough?

7 A. Yes.

8 Q. Do you know why that is?

9 A. Yeah. He was the first officer.

10 Q. Why did he become the first officer?

11 A. Because Larry was probably in training for
12 the Boeing.

13 Q. Okay. You took -- you alternated?

14 A. Right. We didn't go at the same time.

15 Q. All right. Then the Gulfstream has the
16 same aircraft make and model. That's the same
17 Gulfstream airplane, right?

18 A. Yes.

19 Q. But the aircraft identification mark
20 changes --

21 A. Correct.

22 Q. -- on March 5th, 2001.

23 A. Correct.

24 Q. And it changes to N -- it changes from
25 N908JE to N909JE.

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2 A. Yes.

3 Q. Why was that?

4 A. Because the N908JE went to the Boeing.

5 That was going to be on the Boeing now.

6 Q. And the new number for N909JE was
7 transferred to the Gulfstream?

8 A. Correct.

9 Q. And where does that first flight on the
10 5th go?

11 A. From Palm Beach to Stephenville up in
12 Newfoundland for a fuel stop.

13 Q. Okay. And then how do you know it is a
14 fuel stop?

15 A. Because we are going to Paris, and so we
16 have to stop there for fuel.

17 Q. Okay. I know how -- I know how you would
18 know that. But is there any indication on any of
19 the numbers that go off to the right that would tell
20 me that it's a fuel stop as opposed to --

21 A. No.

22 Q. No? Okay. All right. So there's no way
23 after today's deposition I can look at any of the
24 numbers; it's not going to tell me what it was for?

25 A. No. No. And it's -- obviously it looks

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2 different, because one day is the 5th; one day is
3 the 6th. But we landed there like at 11:50 at
4 night. And then when we took off, it was, you know,
5 the next day.

6 Q. Okay. Got it.

7 And then where do you go the next day?

8 A. We went from Stephenville to
9 Paris-Le Bourget.

10 Q. And who were the passengers going to
11 Paris?

12 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
13 Tayler, and Virginia Roberts.

14 Q. And then what's the next flight?

15 A. On the 8th, from Paris to -- I believe
16 that is in Spain.

17 Q. Granada, Spain?

18 A. Granada, Spain. Correct.

19 Q. Okay. And who are the passengers on that
20 trip?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
22 Tayler, Virginia Roberts, Alberto and Linda Pinto,
23 one female, and Ricardo, it looks like Orieta.

24 Q. And then what's the next flight?

25 A. From there to Tangiers. From Granada to

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2 Tangiers.

3 Q. When you landed -- sorry to go back --

4 when you landed in -- what did we say LEGR was?

5 A. Granada, Spain.

6 Q. Where did -- where did you stay? Where do
7 you stay on those trips?

8 A. We didn't stay. We left the same day, I
9 believe.

10 Q. Okay. What if we go back to one flight to
11 LFPB?

12 A. Uh-huh. LFPB.

13 Q. That's Paris?

14 A. Yeah. We stayed in Paris.

15 Q. And do --

16 A. We stayed there.

17 Q. Do you know -- do you stay at the same
18 location where Jeffrey Epstein, Ghislaine Maxwell,
19 Emmy Tayler, and Virginia Roberts stay?

20 A. No.

21 Q. Where do you stay while you are in Paris?

22 A. Hotel.

23 Q. Where do they say?

24 MR. PAGLIUCA: Object to foundation.

25 THE WITNESS: He has a place there, in

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2 Paris.

3 BY MR. EDWARDS:

4 Q. Okay. Jeffrey Epstein has a home or a
5 house in Paris?

6 A. Right.

7 Q. Okay. Have you been to it?

8 A. Yes, I believe I have.

9 Q. Have you ever stayed there?

10 A. No.

11 Q. And getting to and from the airport, were
12 you ever in the car riding to or from the airport in
13 Paris with Jeffrey Epstein?

14 A. No.

15 Q. So going down to the 9th, then, where is
16 that flight?

17 A. That is from Tangiers to London Luton
18 Airport.

19 Q. And is Luton Airport, is that a major
20 airport?

21 A. For general aviation it is. There is
22 airline service in there, but it is not a huge one,
23 for sure.

24 Q. Who were the passengers?

25 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy

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2 Tayler, and Virginia Roberts.

3 Q. And am I reading this correctly that the
4 next flight is two days later, on the 11th?

5 A. Yes.

6 Q. And where does the flight on the 11th go?

7 A. From Luton to Bangor, Maine.

8 Q. All right. While in London, do you know
9 what Jeffrey Epstein, Ghislaine Maxwell, Emmy
10 Tayler, and Virginia Roberts did?

11 A. No, I do not.

12 Q. Do you know who they saw?

13 A. No, I do not.

14 Q. After the flight to Maine, where is the
15 next flight?

16 A. Maine is from Bangor to Teterboro the same
17 day.

18 Q. Okay.

19 A. So that was a fuel stop.

20 MR. EDWARDS: All right. We are at a good
21 time to stop. The videographer has to change
22 tapes.

23 THE WITNESS: Okay.

24 MR. EDWARDS: So we why don't we take a
25 five-minute break.

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2 THE WITNESS: Okay.

3 THE VIDEOGRAPHER: Off the record at
4 10:57.

5 (Thereupon, a recess was taken, after
6 which the following proceedings were held:)

7 THE VIDEOGRAPHER: This is the beginning
8 of Disk 2. On the record at 11:12.

9 BY MR. EDWARDS:

10 Q. Sure. If we go back to page 41,
11 December 7th, 2000.

12 MR. PAGLIUCA: Give us a Bates page,
13 please.

14 MR. EDWARDS: Right, 41. For the
15 remainder, when I say "page," I'm really just
16 referring to the Bates number.

17 BY MR. EDWARDS:

18 Q. So page 41, December 7th, 2000.

19 A. Okay.

20 Q. Do you see that?

21 Where was that flight going from and to?

22 A. Luton to -- Luton -- that's going into
23 Marham Air Force Base.

24 Q. Do you remember why you would have flown
25 into the Air Force base?

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2 A. We flew in there to drop the passengers
3 off. And then these passengers that were on there,
4 we dropped them off. And then -- let's see. We
5 repositioned.

6 I don't remember. We dropped passengers
7 off, and we had to leave, I believe.

8 Q. Okay. That was --

9 A. We weren't allowed to stay there.

10 Q. That was Tom Pritzker?

11 A. Yes.

12 Q. And then did you also drop off Jeffrey
13 Epstein, Ghislaine Maxwell, Kelly Spamm?

14 A. Yes.

15 Q. Okay.

16 A. I believe everyone got off the airplane
17 there.

18 Q. And where did you reposition to?

19 A. It says, "Positioned in Norwich, England."
20 I guess it's Norwich.

21 Q. Sandringham, that is what it says right
22 above that. What is that?

23 A. Sandringham. I believe Sandringham is the
24 estate that the queen has --

25 Q. Okay.

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2 A. -- near there.

3 Q. All right. And the flight on
4 December 9th --

5 A. Uh-huh.

6 Q. That's Jeffrey Epstein, Ghislaine Maxwell,
7 Emmy Tayler, Kelly Spamm?

8 A. Right.

9 Q. And then what did you write in the
10 parenthesis under that?

11 A. "Blowing snow on runway." It was a great
12 weird phenomenon that happened that night.

13 Q. And then you're leaving out of that
14 Sandringham Airport; is that right?

15 A. We are -- which one are you on?

16 Q. On the 9th.

17 A. On the 9th --

18 Q. The first entry on the 9th.

19 A. The 9th, we're leaving, looks like
20 Norwich, England, I believe, EGSH, and we go to
21 Gander, Newfoundland --

22 Q. Okay?

23 A. -- for a fuel stop.

24 Q. I think before we took a break that we
25 were on page 43.

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2 A. Uh-huh.

3 Q. And the flight that began in Palm Beach,
4 before going to Paris and Belgium, Tangier, I think
5 you told me, it ended up in Maine --

6 A. Correct.

7 Q. -- on March 11th, 2001.

8 A. Right.

9 Q. Or, sorry, it ended up in Teterboro.

10 A. Teterboro.

11 Q. Okay. And then on the 15th, you fly
12 from -- on the Gulfstream out of Teterboro to ISP.
13 Do you know where that is?

14 A. Islip, New York.

15 Q. Okay. And Virginia Roberts was on the
16 flight that landed in Teterboro on the 11th,
17 correct?

18 MR. PAGLIUCA: Object to form and
19 foundation.

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. But leaving out of Teterboro, she's not
23 one of the passengers on the flight.

24 A. No.

25 Q. Any idea where she went?

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2 A. No.

3 Q. Okay.

4 MR. PAGLIUCA: Are you referring to
5 Bates 0041, the 11th through 14th? Is that
6 what you're talking about?

7 MR. EDWARDS: Forty-three.

8 MR. PAGLIUCA: Forty-three.

9 MR. EDWARDS: March 11th and March 15th,
10 2001.

11 MR. REINHART: If it will help there, the
12 flight numbers column, like the fifth or sixth
13 column over, are sequentially numbered and
14 unique numbers. So if you want to just say
15 "flight 1468" --

16 MR. EDWARDS: Okay.

17 MR. REINHART: -- that might help
18 everybody --

19 MR. EDWARDS: Right.

20 MR. REINHART: -- follow along.

21 MR. EDWARDS: Okay. Thanks, Bruce.

22 MR. REINHART: Uh-huh.

23 BY MR. EDWARDS:

24 Q. So the flight now that I'm talking about
25 that leaves out of Teterboro on the 15th, flight

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2 No. 1471 --

3 A. Right.

4 Q. -- the passengers appear to be Jeffrey
5 Epstein, Ghislaine Maxwell, Adam Perry Lang, Alexia
6 Wallert and Banu Cukuglu?

7 A. I think so.

8 Q. Do you remember Banu?

9 A. I definitely remember that. It was a hard
10 name to spell.

11 Yeah. Sort of, I guess. I mean, if she
12 walked in right now, I probably wouldn't recognize
13 her.

14 Q. Well, it has been since 2001, so --

15 A. Yeah, I know.

16 Q. Okay. So then the next flight is 1472.

17 Where is that? Where is that going?

18 A. From Islip to Lake City, Florida.

19 Q. All right. And the passengers, again, are
20 who?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
22 Perry Lang, Alexia Wallert and Banu Cukuglu,
23 whatever her name is.

24 Q. Did you know what relationship she had, if
25 at all, with Jeffrey Epstein?

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2 A. No. No.

3 Q. Do you remember an Ed Tuttle?

4 A. Yes.

5 Q. And who was he?

6 A. I believe Ed was a, probably in
7 construction. I think he may have been around
8 before the Jeffrey -- well, let me think.

9 Q. If we skip down to March 16th, I see his
10 name. So I don't know if that's going to help you.

11 A. I believe -- I believe Ed Tuttle was like
12 maybe an architect, or somewhere in the
13 construction, real estate side, I believe.

14 Q. Okay. So flight No. 1477 --

15 A. Uh-huh.

16 Q. -- from LaGuardia to Palm Beach, is that
17 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Joe
18 Pagano, Eva Dubin?

19 A. Yes.

20 Q. Celina Dubin?

21 A. Yes.

22 Q. Jordan Dubin?

23 A. Right.

24 Q. Maya Dubin and two nannies?

25 A. Yes.

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2 Q. And Alexia Wallert? Is that what that is?

3 A. I would assume so, yes, AW.

4 Q. That is sort of what we talked about in
5 the beginning, where Alexia Wallert appears in full
6 name at the top --

7 A. Right.

8 Q. -- and it's AW, AW, AW.

9 A. And there's no room to write her name out
10 there --

11 Q. Right.

12 A. -- so she's AW.

13 Q. Okay. And then the next flight, the 27th,
14 leaves out of Palm Beach. Who are our passengers on
15 that flight and where's it going? 1478 is the
16 flight.

17 A. Yeah. Jeffrey Epstein, Ghislaine Maxwell,
18 Emmy Tayler, Virginia Roberts, two females, Banu,
19 and that's it.

20 Q. And do you know, in New York, when that
21 plane lands in Teterboro, where do you stay when the
22 plane is up there?

23 A. It is 2001. At an apartment there.

24 Q. Did you have your own apartment?

25 A. Yes.

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2 Q. Or did you stay at one of Jeffrey
3 Epstein's apartments?

4 A. No. It was his apartment, Jeffrey's
5 apartment.

6 Q. Was that one of the apartments at 301 East
7 66th Street?

8 A. Yes.

9 Q. And did any of the other passengers from
10 that flight, that 1478, did any of them stay at any
11 of those apartments?

12 A. Yeah. Emmy would have. Virginia probably
13 did.

14 Q. Did you see Virginia stay at the
15 apartment?

16 A. I don't know.

17 Q. When you were in New York and you left
18 from the airport, did you ride in the same car with
19 Virginia?

20 A. Not usually. I mean, I don't know if we
21 ever did. It's possible we did.

22 Q. Do you know whether Virginia Roberts
23 stayed at Jeffrey Epstein's townhouse or whether
24 Virginia Roberts stayed at the apartments?

25 MR. PAGLIUCA: Object to form.

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2 THE WITNESS: I don't know for sure.

3

4 BY MR. EDWARDS

5 Q. Can you recollect riding in a car with
6 her, or can you recollect whether she got in a car
7 with anyone else?

8 MR. PAGLIUCA: Object to form.

9 THE WITNESS: I can't.

10 MR. EDWARDS: Okay.

11 MR. REINHART: I'm sorry. Are you asking
12 about that specific trip or --

13 MR. EDWARDS: Sorry.

14 BY MR. EDWARDS:

15 Q. I mean that specific trip.

16 A. No. I can't.

17 Q. How about in general at any time?

18 A. No. I don't recall. I mean, I can
19 recall, I would ride sometimes with Emmy, with Adam
20 I remember them being in the car. But, again, that
21 was unusual. Usually it would just be Larry and
22 myself. But on occasion, you know, somebody might
23 ride with us.

24 Q. When you would stay at the apartment in
25 New York on East 66th Street, would it always be in

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2 the same apartment?

3 A. Yes.

4 Q. All right. There are multiple apartments
5 owned by Jeffrey Epstein?

6 A. At that time, it was the same apartment.

7 Q. Okay. Have you stayed in other apartments
8 since that time?

9 A. Yes.

10 Q. All at that East 66th Street location?

11 A. Yes. I really don't -- I don't have an
12 apartment there now. We haven't gone there since
13 probably 2008.

14 Q. How about Banu? Would she have stayed at
15 301 East 66th Street?

16 MR. PAGLIUCA: Object to foundation.

17 THE WITNESS: Most likely.

18 BY MR. EDWARDS

19 Q. Why do you say that?

20 A. Well, if she's on the plane with us on
21 multiple trips, then most likely she probably stayed
22 there.

23 Q. Have you been to Jeffrey Epstein's
24 townhouse as 9 East 71st Street?

25 A. Yes.

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2 Q. And it's a pretty big place, right?

3 A. Pretty big.

4 Q. And it has numerous bedrooms?

5 A. Yes.

6 Q. Any reason why Banu would not have been
7 staying there?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: I don't know.

10 BY MR. EDWARDS

11 Q. I'm just trying to get to, is there a
12 reason why you believe that Banu would have, I think
13 you said, probably have stayed at the apartment
14 versus the townhouse?

15 A. Well, I only say that because Emmy, you
16 know, stayed there.

17 Q. Stayed where?

18 A. At the -- at our apartments.

19 Q. Okay.

20 A. I'm pretty sure Adam, yeah, Adam stayed
21 there at the time. So most of the people that were
22 regulars on the flight, they would stay there in the
23 apartments.

24 Q. Okay. But do you remember Virginia or
25 Banu staying in the apartments?

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2 A. I do not specifically.

3 Q. Okay. The next flight on the next day,
4 1479, is flying from Teterboro to Santa Fe; is that
5 right?

6 A. Yes.

7 Q. And who are those passengers?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
9 Perry Lang, Virginia Roberts, Banu, Marvin Minsky,
10 Henry Jarecki.

11 Q. Do you remember Marvin and Henry?

12 A. I remember Henry. I don't really remember
13 Marvin.

14 Q. Okay. And then two days later -- again,
15 where would you have stayed if you landed in
16 Santa Fe on March 29th, 2001?

17 A. Probably would have stayed at the ranch.

18 Q. At the Zorro Ranch?

19 A. Yes.

20 Q. All right. Did the other passengers that
21 were on the plane, Jeffrey Epstein, Ghislaine
22 Maxwell, Adam Perry Lang, Virginia Roberts, Banu --
23 I'm not evenning going to try her last name --

24 A. Right.

25 Q. -- Marvin Minsky and Henry Jarecki also

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2 have stayed at the ranch?

3 MR. PAGLIUCA: Object to foundation.

4 THE WITNESS: I'm going to say most likely
5 they did.

6 BY MR. EDWARDS

7 Q. Was there any other location in Santa Fe
8 where you are aware passengers would have stayed?

9 A. Not that I'm aware of.

10 Q. If you were all going to the same place,
11 is that an occasion where you would all ride in the
12 same vehicle from the airport to the ranch?

13 MR. PAGLIUCA: Object to foundation.

14 THE WITNESS: I don't know.

15 BY MR. EDWARDS

16 Q. You would still right in separate
17 vehicles?

18 A. Right. Because it takes us about an hour
19 to finish up at the airport.

20 Q. And then the 31st, so two days?

21 A. Let me go back to that one --

22 Q. Sure.

23 A. -- and say, it is possible. I think Adam
24 has ridden with us before. So I couldn't swear that
25 one way or the other. But he has probably ridden

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2 with us before to the airport; to or from the
3 airport.

4 Q. Two days later, flight No. 1408 out of
5 Santa Fe to Palm Beach, who were the passengers
6 there?

7 A. Jeffrey Epstein, Ghislaine Maxwell, Prince
8 Andrew, Virginia Roberts, Nadia BJORLIN, Henry
9 Jarecki, Marvin Minsky.

10 Q. Do you remember when you were at the ranch
11 Nadia BJORLIN arriving?

12 A. I would assume that she airlined in there.

13 Q. Do you remember her at the ranch? Did she
14 perform for you or anything?

15 A. No.

16 I don't remember her at the ranch. I
17 mean, I'm sure she was there. I just don't
18 remember.

19 Q. Okay. Do you remember a person named
20 Heather Mann? She's found on flight 1438 next to
21 Lydia.

22 A. Heather Mann, not really.

23 Q. Okay. The next flight, on page 45, is
24 1488. The flight number. April 9th, 2001.

25 A. Right.

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2 Q. Where does that flight take off from and
3 where does it go?

4 A. Palm Beach to Atlantic City.

5 Q. Who is on that flight?

6 A. Jeffrey Epstein, Emmy Tayler, Virginia
7 Roberts, Banu and Johanna.

8 Q. Do you remember Johanna Sjoberg?

9 A. I don't.

10 Q. On that same day, you take a flight to
11 Teterboro?

12 A. Right.

13 Q. Did you go to the casinos at all that day?

14 A. I don't think so.

15 Q. Would that be something that you would do
16 with them? Or you would stay back?

17 A. No. We would stay at the airport.

18 Q. All right.

19 And then two days later, on the 11th,
20 flight 1490, the plane flies out of Teterboro.

21 For that two-day period of time, the night
22 of the 9th and the night of the 10th, would you have
23 stayed at the apartment?

24 MR. PAGLIUCA: Object to foundation.

25 MR. EDWARDS: In New York.

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2 THE WITNESS: I would say, yes.

3 BY MR. EDWARDS:

4 Q. All right. Do you know where Virginia and
5 Banu and Johanna stayed?

6 A. No idea.

7 Q. You can't recollect whether they were --
8 you can't recollect seeing them at the apartments?

9 MR. PAGLIUCA: Object to foundation.

10 THE WITNESS: No.

11 BY MR. EDWARDS:

12 Q. All right.

13 Then on the 11th, you leave from Teterboro
14 and go to where?

15 A. St. Thomas.

16 Q. That is flight 1490. And on that flight,
17 Jeffrey Epstein, Ghislaine Maxwell, Prince Andrew,
18 Banu, Virginia Roberts and Johanna?

19 A. Yes.

20 Q. And that is -- that is a flight -- how
21 does -- how did those passengers get from -- does
22 Jeffrey Epstein have a place in St. Thomas?

23 MR. PAGLIUCA: Object to form.

24 THE WITNESS: Well, yes.

25

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2 BY MR. EDWARDS:

3 Q. Where is that?

4 A. In St. Thomas, he has an office. In St.
5 Thomas.

6 Q. Where does he stay in the Virgin Islands?

7 A. On Little St. James.

8 Q. And how do the passengers get from
9 St. Thomas to Little St. James?

10 A. Most likely, helicopter.

11 Q. How many people does the helicopter fit?

12 A. We didn't own a helicopter then.

13 Probably -- probably 5. It depends,
14 because they had different helicopters. I'm not
15 sure which one they used that day.

16 Q. What is the duration of the flight from
17 St. Thomas to Little St. James?

18 A. About six minutes.

19 Q. What is the duration of a boat trip from
20 Little St. James to St. Thomas?

21 A. Probably about, let's say, 15 to 20
22 minutes. But you are on the east side of the island
23 and the airport is almost to the west side of the
24 island.

25 Q. So you have to almost circle the island?

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2 A. To get from the island by boat, to get
3 to -- there's land there and take a car, it is
4 probably -- it is probably close to an hour, 45
5 minutes for sure.

6 Q. Are there passenger manifests that are
7 kept for the helicopters?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: I'm not sure. I'm not sure.

10 BY MR. EDWARDS:

11 Q. Back in this time, in around April of
12 2001, did Jeffrey Epstein have a helicopter yet?

13 A. No, he did not have a helicopter.

14 Q. At that time?

15 A. Correct.

16 Q. And so do you remember the name of the
17 company or corporation that they rented or
18 transported?

19 A. I don't. It was the only -- helicopter
20 service there in St. Thomas is no longer there.

21 Q. Okay.

22 A. Air Center Helicopter.

23 Q. Was there a particular person at Air
24 Center Helicopter that you ever coordinated with?

25 A. We would, like, call a dispatcher. Or you