

United States v. Ghislaine Maxwell

S2 20 Cr. 330 (AJN)

Jeffrey and Ghislaine have been together, a couple, for the last 11 years. They are, contrary to what many people think, rarely apart – I almost always see them together

Ghislaine is highly intelligent, and great company with a ready smile and an infectious laugh who always puts one at ones ease, and always makes one feel welcome.

Jeffrey and Ghislaine share many mutual interests and they have a lot of fun together. They both have keen searching and inquisitive minds. She grew up amongst scientists and in an academic and business environment.

They share a love of travel and art. She speaks 5 languages. She enjoys spending time visiting auction houses (she says that is the best way to learn about art and antiques – your expected to look touch and ask questions)

Ghislaine also has her own interests and has her own business pursuits – she is independent and strong willed - something which Jeffrey loves about her - She is adventurous – she flies helicopters, she is athletic – she rides horses, plays tennis, skis and scuba dives. She is a serious photographer (she always has a camera in hand) who is collaborating with some of the leading people involved at the cutting edge of digital photography.

Jeffrey and Ghislaine compliment each other really well and I cannot imagine one without the other. On top of being great partners they are also the best of friends.

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Jeffrey and Ghislaine have a great relationship and they have a lot of fun

Origin

Authors

gmax

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GOVERNMENT
EXHIBIT
422-B
S2 20 Cr. 330 (AJN)

Registry SOFTWARE Information	
Install Date	2/22/2001 20:46:35 +0000
Product Name	Microsoft Windows 2000
Registered Organization	gmax
Registered Owner	gmax
CSDVersion	Service Pack 1
Digital Product ID	A4 00 00 00 03 00 00 00 35 31 38 37 33 2D 4F 45 4D 2D 30 30 34 35 30 32 33 2D 30 39 31 33 36 00 13 00 00 00 41 32 32 2D 30 30 30 30 31 00 00 00 00 00 00 00 00 E0 4A AB B5 09 36 00 29 98 BA 60 ED 4E F5 00 00 00 00 00 00 15 26 95 3A 0A B7 05 00 02 00 37 37 34 32 33 00 00 00 00 00 00 00 8A 01 00 00 0E 02 D1 07 00 01 00 00 21 18 00 AC 85 CC 15

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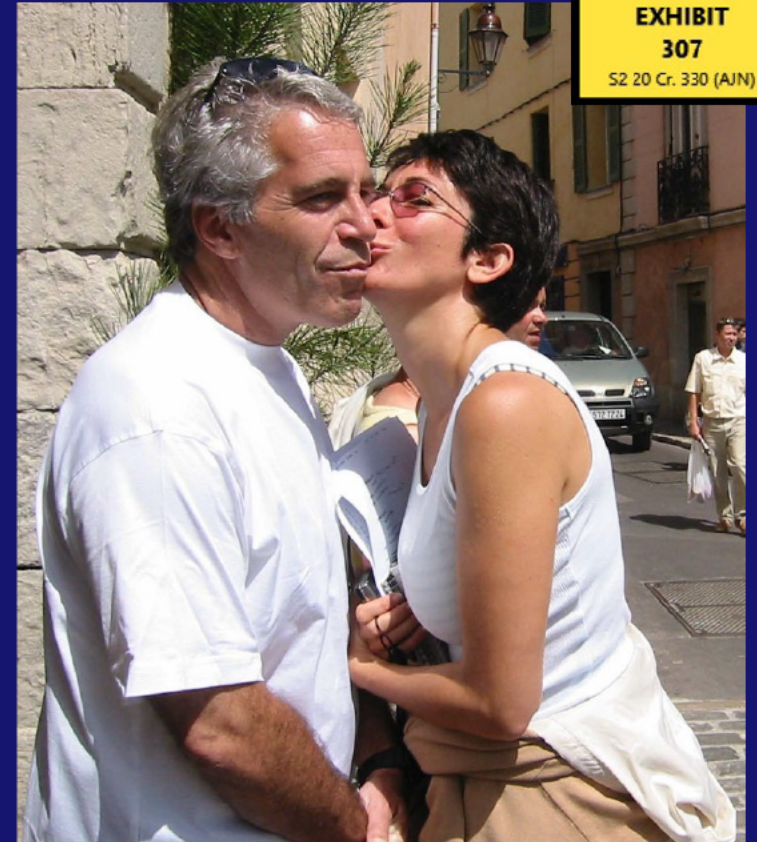
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308**
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Q. What, if anything, did Ms. Maxwell tell you about her role in Mr. Epstein's life?

A. From the day she came to the house, she -- she right away took over, and she mentioned to me that she was going to be the lady of the house, and also she was in charge of other homes, other properties.

HOUSEHOLD MANUAL

Stationary

- ❑ Three sizes of *Jeffrey Epstein* notepads.
- ❑ Two sizes of *Ghislaine Maxwell* and *Lady Ghislaine* notepads.
- ❑ Letterhead stationary and envelopes. One pack from each of Mr Epstein's residences and business. Mr Epstein's personal stationary (writing paper, notepads, envelopes, compliment slips).
- ❑ *Jeffrey Epstein* and *Ghislaine Maxwell* cards and envelopes.

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- Try and anticipate the needs of Mr Epstein, Ms Maxwell and their guests.

**GOVERNMENT
EXHIBIT**

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- Try and anticipate the needs of Mr Epstein, Ms Maxwell and their guests.

- A copy of Mr Epstein and Ms Maxwell's telephone directories must be placed to the right of each telephone (except for the Guestrooms).

**GOVERNMENT
EXHIBIT**

606

S2 20 Cr. 330 (AJN)

- Try and anticipate the needs of Mr Epstein, Ms Maxwell and their guests.

Mr Epstein's breakfast preferences:

- Glass of water
- Coffee
- 1 Sweet and Low or Equal
- Creamer filled with Half & Half, warmed in the microwave for 25 seconds.
- Mr Epstein will indicate what food he would like to eat.

Ms Maxwell's breakfast preferences:

- Maxwell House coffee served with milk
- Freshly squeezed orange juice
- Glass of water
- 1 Weetabix with sliced banana. Milk and sugar on the side.

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**GOVERNMENT
EXHIBIT**

606

S2 20 Cr. 330 (AJN)

- Try and anticipate the needs of Mr Epstein, Ms Maxwell and their guests.

“Mr Epstein / Ms Maxwell is not available. May I take a message?”

Complete a phone message slip with the following information: Name (spelt correctly), date and time of call, telephone number including the area code.

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- If the incoming line is one of Mr Epstein's or Ms Maxwell's, answer as follows:

“Good morning / afternoon / evening, Epstein / Maxwell residence.”

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HOUSEHOLD MANUAL

GOVERNMENT
EXHIBIT

606

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PB New Shampoo and Massage productsShampoo

Tresemme Hydrology – Normal Hair
Thermasilk – Heat activated. Moisturizing
Clairol daily defense – Dry/damaged
Nexus - Vita Tress. Biotin
Nexus – Herbal. Rep ‘r’ mint
Nexus – Assure
Phytologie – Phytorhum fortifying, with rum and eggs
Phytologie – Plytopanama
Plytotherathrie – Frequent use
Modern Elizirs – Refining
Sebastian – Performance active
VS Sasoon – Moisturizing hair wash
Revlon – Moisture replacement therapy
Te Tao – Tea for hair
J. F. Lazartigue – Sham. For frequent use
J. F. Lazartigue – After swimming sham.

Massage

Lancome – Aroma fit mass. Oil
Lancome – Aroma calm relaxing legs and feet gel
Clarins – Huile “Relax” body treatment oil
Kiehls – Instant satin soft body rub
Kiehls – Aloe mass. Cream
Kiehls – Body mass. Oil
Kiehls – Satin soft soluble bath oil and body rub
Laura Mercier – Crème Brulee Souffle body cream
Sisley – Hydra flash intense body formula
Kneipp – Herbal body mass. Oil. Jojoba nut complex
Estee Lauder – Healing essence for mind and body
Estee Lauder – Private spa body collection. Moisture mass. Silky body lotion
Burberry – Babytouch. Soothing massage oil

09/07/02

PB New Shampoo and Massage products

Shampoo

Tresemme Hydrology – Normal Hair
Thermasilk – Heat activated. Moisturizing
Clairol daily defense – Dry/damaged
Nexus - Vita Tress. Biotin
Nexus – Herbal. Rep ‘r’ mint
Nexus – Assure
Phytologie – Phytorhum fortifying, with rum and eggs
Phytologie – Plytopanama

09/07/02

Origin

Authors gmax

Last saved by gmax

Massage

Lancome – Aroma fit mass. Oil
Lancome – Aroma calm relaxing legs and feet gel
Clarins – Huile “Relax” body treatment oil
Kiehls – Instant satin soft body rub
Kiehls – Aloe mass. Cream
Kiehls – Body mass. Oil
Kiehls – Satin soft soluble bath oil and body rub
Laura Mercier – Crème Brulee Souffle body cream
Sisley – Hydra flash intense body formula
Kneipp – Herbal body mass. Oil. Jojoba nut complex
Estee Lauder – Healing essence for mind and body
Estee Lauder – Private spa body collection. Moisture mass. Silky body lotion
Burberry – Babytouch. Soothing massage oil

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**GOVERNMENT
EXHIBIT
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Q. What did you do with the dildo?

A. The dildo, I use to put my gloves on, put them in the sink, run it under water, and put the dildo in Ms. Maxwell's closet in a basket.

Q. I want to be clear here. Where did you find the dildo after the massage?

A. Usually at the table, at the massage table or at his bed.

Q. If that's where you found it, why would you put it in Ms. Maxwell's bathroom?

A. That's the place what I was told -- it was kept all the time.

HOUSEHOLD MANUAL

- Remember that you see nothing, hear nothing, say nothing, except to answer a question directed at you. Respect their privacy.

HOUSEHOLD MANUAL

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Q. Mr. Alessi, when Ms. Maxwell gave you this booklet, what did you understand this rule to mean?

A. It means a kind of warning that I was supposed to be blind, deaf and dumb to say nothing of their lives.

Q. Can you describe what grooming typically entails at a high level.

A. So it's usually thought to include behaviors that fall into five general stages:

The first having to do with selection and identification of a victim; then obtaining access and -- to the victim and isolating that victim for the purpose of sexual abuse; then engaging in lies and deception and manipulation in order to build a relationship of trust and attachment with the child; then a process of desensitizing the child to both physical touch, sexual content, and sexual touch; and then finally, a process of maintaining control in order to coerce the child into continued sexual abuse and to reduce the likelihood of disclosure.

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likelihood of disclosure.

GOVERNMENT

EXHIBIT

101

S2 20 Cr. 330 (AJN)



Q. How did that relate to your breast and hip size?

A. She just said that I had a good body type.

Q. And just so we're clear about who she is?

A. Maxwell.

Q. You said she felt your boobs. Did she touch you?

A. Yes.

Q. Where?

A. On my breasts.

Q. And where did that happen?

A. In the massage room or the bathroom.

Q. During these incidents, did Maxwell ever touch your body?

A. Yes.

Q. Where would she touch you?

A. I would say mainly my breast.

Q. Can you explain to the jury in your own words how you experienced Maxwell touching your breasts during the massage in New Mexico?

A. I was very uncomfortable and fearful and wanted to get off of the table, that massage table, and wanted it to be over with.



February 9, 1994

Mr. Jeffrey Epstein
J. Epstein and Company, Inc.
The Villard House
457 Madison Avenue
New York, NY 10022

Dear Jeffrey:

I have talked to you and Ghislaine on several occasions to say thank you. But, I wanted to express in writing my personal and professional gratitude for the very generous gift of \$200,000 for a new scholarship lodge. It is truly an extraordinary gesture.

I thought an update would be appropriate at this time.

1. The contract with Town and Country has been executed and they have scheduled construction of the lodge.
2. We are waiting for the temperature to rise above 10-15 degrees so that we can move the existing buildings and set the foundation. (The June target date remains at this time.) Design and construction of the exterior walls is underway.
3. You have approved the latest set of drawings with the basement entrance as indicated and approved the green roof which works for us as well.
4. We are requesting furniture packages from local vendors that will be both aesthetic and functional for a rental lodge. When we receive the packages and corresponding quotes, we will send them on to Ghislaine for her comments and suggestions.



**GOVERNMENT
EXHIBIT
745
S2 20 Cr. 330 (AJN)**

December 23, 1994



Ghislaine Maxwell
c/o J. Epstein & Company, Inc.
The Villard House
457 Madison Avenue
New York, NY 10022

Dear Ghislaine:

Enclosed is the envelope we recently found in cleaning the Epstein Lodge. Apparently it lodged between the wall and the dresser. It was not discovered until the unit was moved for cleaning.

As we discussed, the final week of Camp is August 14 through the 20th. I have reserved the lodge for Jeffrey's use. In addition, he has one more week that he can reserve for himself or guests he may wish to have use it. Attached is a list of the dry goods that are in storage as part of Jeffrey's personal inventory. Please advise if we are missing any items you are aware of being sent here.

Please convey to Jeffrey how pleased we are to have such a facility on our campus. In fact, the President Elect will be staying in the lodge until his family's furniture arrives. It is a remarkable place. We are grateful.

Best wishes for a wonderful holiday season.

Sincerely,



Timothy J. Ambrose
Vice President
Institutional Advancement

Enclosures: Inventory listing
Lost envelope

Q. What was your reaction when he did that to you?

A. Well, I was frozen in fear. I'd never seen a penis before, let alone not seen anything like this.

A. It would be them leading me to a massage table and showing me how Jeffrey likes to be massaged.

Q. Who would tell you how Jeffrey likes to be massaged?

A. Ghislaine and Jeffrey.

Q. Who was most frequently in the room when you had sexual contact with Jeffrey Epstein when you were 14 years old?

A. Ghislaine Maxwell.

Q. Who would give you instructions?

A. Ghislaine and Jeffrey.

Q. What kind of instructions would they give you?

A. Just showing me, you know, what he likes, what -- you know, what men like, what women like, you know, sort of touching on breasts and touching his penis.

Q. What was Maxwell's demeanor like during these incidents?

A. I would say that it seemed very casual, like it was -- like it was very normal, like it was not a big deal.

Q. And when she behaved like that, how did that make you feel?

A. Well, it made me feel confused because that did not feel normal to me; I'd never seen anything like this or felt any of this, and it was very embarrassing. You know, it's all these mixed emotions. When you're 14, you have no idea what's going on.

A. So he would show me what he likes. And basically, he would -- he would use vibrators on me, he would put his fingers in my vagina, he would start to masturbate, and he would ask me to straddle his face. He would ask me to, like, squeeze his nipples really hard while he came.



**GOVERNMENT
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**GOVERNMENT
EXHIBIT
928-R
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Q. When you first met Jane, about how old was she?

A. I don't know exactly how old she was, but she appeared to be young.

Q. About how old did she appear to you?

A. I would say 14, 15.

Q. Who did you observe Jane spending time with when she came without her mother to the house?

A. Ms. Maxwell and Mr. Epstein.

Q. So did you drive Jane to the airport?

A. Jane with Mr. Epstein and Ms. Maxwell, Max, the little dog, and other guests.

Q. And what did Jane tell you about how old she was when she had to do things with Jeffrey Epstein?

A. She said that it started at 14, when she met him.

Q. Did she tell you that the woman in the house made her feel comfortable?

A. Yes.

Q. Is it common for children to disclose sexual abuse at or near the time of the abuse?

A. Not at all, no.

A. Jane told her mother that -- that she -- that the money was not free, and that there's no way that she couldn't have known that it wasn't free.

A. Disclosure is a process that unfolds over time. So individuals will typically begin the disclosure maybe by alluding to what's happened in a general sense or the gist of what's happened. And then it's only over time that they will begin to talk more specifically about what has happened. And even in therapy, oftentimes disclosure of the most intimate or difficult details is something that's very hard and individuals are very reluctant to do.

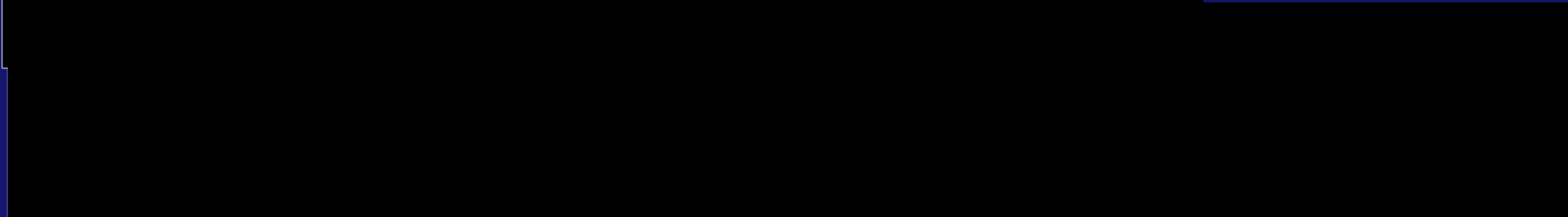
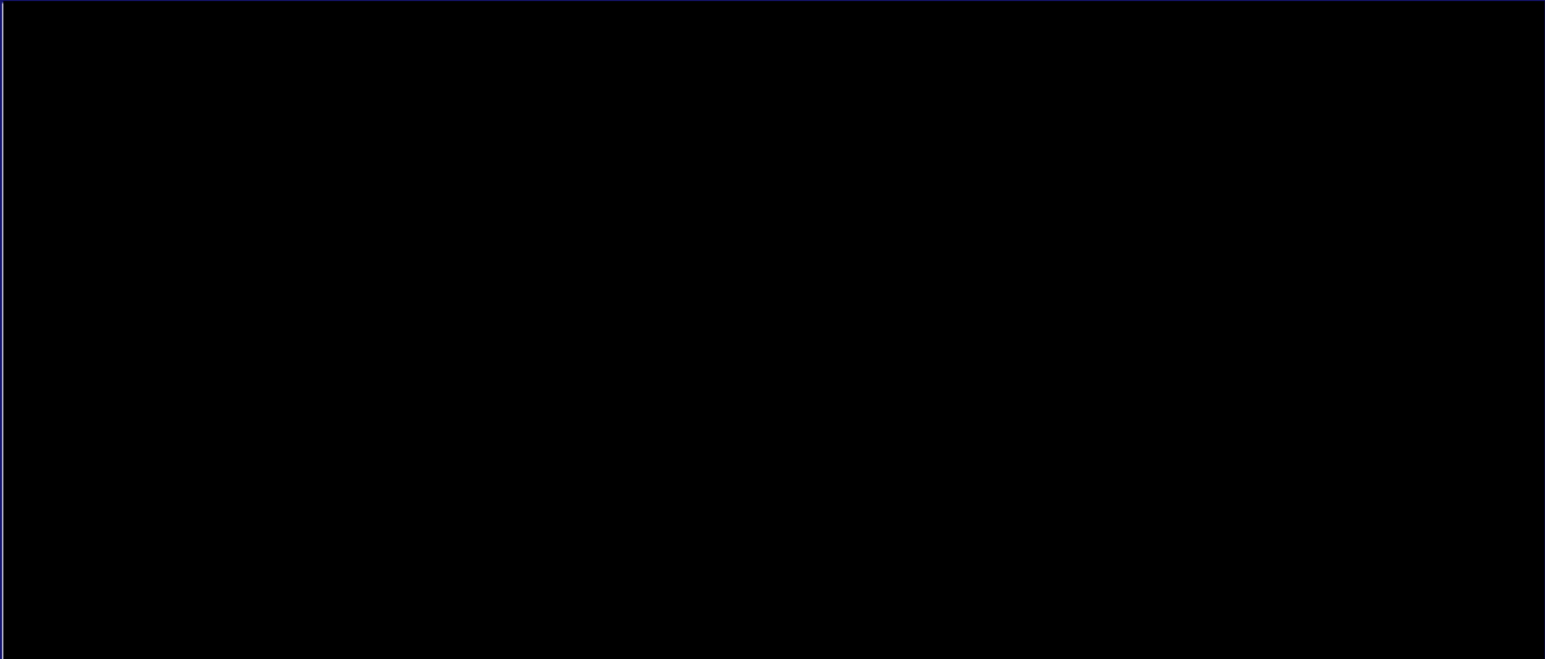
Q. You told the government about a woman named Eva who joined in, correct?

A. Correct.

Q. There was a fourth woman you remembered named Michelle?

A. Yes.

**GOVERNMENT
EXHIBIT
101**
S2 20 Cr. 330 (AJN)



my dream dress, one night we went to
the movies w/ Jeffrey Epstein - I + was a little
weird one of those things that is ~~hard~~ hard
to explain we were sitting next to each other
& he put out his hand for me to hold & we
were holding hands (not weird, normal + fine)
then he kind of caressed/rubbed my arm +
shoe/foot - It was one of those things that
just gave me a weird feeling but wasn't
that weird + probably normal - the one thing
that kind of weirded me out about it was he
let go of my hand when he was talking to
man - Oh well I decided it was no big
deal, I + just made me mad because he

deal, it just made me mad because he is being so amazing - paying for a summer program for me - helping me w/ college - he is so nice + so generous w/ everyone + I just didn't want to have any weird feelings about it - I didn't/couldn't say anything.

so to Maria about it because she worships him + it would just create problems, I wouldn't tell anyone else because it is still not a big deal + I didn't want to portray him in a bad light. I really don't think it is

Another experience after we were back at the residence was that it was decided that I would learn how to give Epstein a foot massage. Maxwell wanted to show me how to rub his feet; and so that was something I should learn how to do. And so she sat and held one of his feet, and then instructed me to hold his other foot and showed me how to rub it.

A. Next, after she said that I was very strong, she said why don't you give his feet a little squeeze to show him how strong you are.

Q. Did you give his feet a little squeeze?

A. Yes.



**GOVERNMENT
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**GOVERNMENT
EXHIBIT
103**
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A. I asked her what happened when she was in New Mexico.

Q. What did Annie say in response?

A. She said, I don't want to talk about it. And I'm just not going to let it ruin my life.

A. She said that Maxwell was very charming, very pretty. She greeted her when she arrived. And I remember that they had a day around town where Maxwell took her shopping.

Q. Did Annie tell you if anyone touched her during the message?

A. Yes.

Q. Who did Annie tell you touched her during the message?

A. Maxwell.

Q. What, if anything, did Annie tell you about where Annie was touched by Maxwell?

A. She told me that she was touched on the breasts.

Q. Did Annie tell you who touched her breasts?

A. Yes.

Q. Who was that?

A. Ghislaine Maxwell.

Q. When you spoke with the FBI in 2006, did you tell the FBI about Maxwell massaging your breasts?

A. Yes.



GOVERNMENT

EXHIBIT

113

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Q. As you were driving up that ramp, what did Ms. Maxwell say to you?

A. She told me to stop, "John, stop."

Q. And after she told you to stop the car, did you stop the car?

A. I stopped the car, and she opened the door and she went towards this girl as she was coming down the ramp.

Q. Let me break that down. After Ms. Maxwell told you to stop, what did you see Ms. Maxwell do?

A. She went to talk to this girl.

A. She said, This is my friend Carolyn.

Q. And what did Maxwell say?

A. You can bring her upstairs and show her what to do.



**GOVERNMENT
EXHIBIT
278**
S2 20 Cr. 330 (AJN)

Q. Carolyn, how would you schedule times to go to Jeffrey Epstein's house for massages?

A. Maxwell would call and set up appointment times.

Q. Would anyone else ever call?

A. I sometimes called and there over time was Sarah Kellen that would call.

"Q. In fact, Mr. Epstein himself did not contact you on each occasion and request you to come, did he?

"A. No, he would have Sarah or Maxwell call me."

"Q. And on these occasions that you called to see if you could go over there and give him a massage, did you talk to him or did you talk to others at his house?

"A. I talked to Sarah or Maxwell. I have also talked to -- I don't know if it's the cook or somebody else that was there that took phone messages."

Q. Did Carolyn tell you that woman's name?

A. Maxwell.

Q. Did Carolyn say anything about that woman's first name?

A. She couldn't pronounce it.

HOUSEHOLD MANUAL

358 EL BRILLO WAY
PALM BEACH, FL 33480

**GOVERNMENT
EXHIBIT**

606

S2 20 Cr. 330 (AJN)

Pool Area

- Check that pool temperature is between 82 - 88°F
- Wipe down all outside tables and chairs.
- Place reading glasses, pens, notepads and a telephone on the pool table outside.
- JE* and *GM* telephone directories placed to the right of the telephone.

**GOVERNMENT
EXHIBIT**

606

S2 20 Cr. 330 (AJN)

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- JE* and *GM* telephone directories placed to the right of the

VEHICLES AND BICYCLES

- Drive all vehicles to make sure that they are in good running condition. No flat batteries.
- Check that cars are full of petrol (never below $\frac{3}{4}$).
- Place \$100 in the glove compartment or center console of each car.
- Two bottles of water.
- JE* and *GM* telephone directories.

GOVERNMENT
EXHIBIT

606

S2 20 Cr. 330 (AJN)

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water.

phone directories.

MASTER BEDROOM

- A/C is set at 60 degrees.
- All light fixtures are working.
- Shutters must be closed.
- Remote controls for the television are working.
- Telephones are on "Do not disturb."
- JE* and *GM* telephone directories placed to right of telephone.

GOVERNMENT
EXHIBIT

606

S2 20 Cr. 330 (AJN)

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- Shutters must be closed.
- Remote controls for the television are
- Telephones are on "Do not disturb."
- JE* and *GM* telephone directories placed

Ms Maxwell's Desk

- Check that the DSL computer line is working.
- Place paper in the copier.
- Plenty of pens and notepads.
- JE & GM* telephone directories placed to the right of the telephone.
- Tissues (replace if less than $\frac{1}{3}$).

GOVERNMENT
EXHIBIT

606

S2 20 Cr. 330 (AJN)

HOUSEHOLD MANUAL

Ms Maxwell's Desk

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- Place paper in the copier.
- Plenty of pens and notepads.
- JE & GM* telephone directories placed to the right of the telephone.
- Tissues (replace if less than $\frac{1}{3}$).

10 | 1999

Account Number: █████ 5-00-1
FINANCIAL TRUST COMPANY, INC.

Morgan Guaranty Trust Company of New York
345 Park Avenue, New York, NY 10154-1002

Asset Account Portfolio
October 01, 1999 - October 31, 1999

JPMorgan

Page 6 of 7

Oct 19 Misc. Disbursement

TRANSFERRED BY WIRE TO
BEAR STEARNS
FAO GHISLAINE MAXWELL

- 18,300,000.00

**GOVERNMENT
EXHIBIT
505**
S2 20 Cr. 330 (AJN)

10 | 1999

Account Number: █████ 5-00-1
FINANCIAL TRUST COMPANY, INC.

Morgan Gu
345 Park A

Oct 19

Asset Account Portfolio

JPMorgan

Page 6 of 7

FAO GHISLAINE MAXWELL

Oct 19 Misc. Disbursement

TRAN
BEAR
FAO

18,300,000.00

- 18,300,000.00

GOVERNMENT
EXHIBIT
505

S2 20 Cr. 330 (AJN)

09 | 2002

Account Number: [REDACTED] 1-00-1
JEFFREY EPSTEIN

JPMorgan Chase Bank
345 Park Avenue, New York, NY 10154-1002

Asset Account Portfolio
September 01, 2002 - September 30, 2002



Page 8 of 9

Sep 18 Misc. Disbursement

TRANSFERRED BY WIRE TO
PALM BEACH NATL BK & TR CO
FAO GHISLAINE MAXWELL
LETTER FROM CLIENT

- 5,000,000.00

**GOVERNMENT
EXHIBIT
504**
S2 20 Cr. 330 (AJN)

09 | 2002

Account Number: [REDACTED] 1-00-1
JEFFREY EPSTEIN

JPMorgan Chase Bank
345 Park Ave [REDACTED] 002

Sep 18

Asset Acc
September 01, 2002 - September 30, 2002



Page 8 of 9

FAO GHISLAINE MAXWELL

Sep 18 Misc. Disbursement

TRANSFER
PALM BEACH
FAO GHISLAINE
LETTER FROM

5,000,000.00

- 5,000,000.00

June 01, 2007 -
June 29, 2007

Ghislaine Maxwell

Primary Account Number: [REDACTED] 6312

JPMorgan 
Private Bank

GOVERNMENT
EXHIBIT
502
S2 20 Cr. 330 (AJN)

Premier Checking

Account Number [REDACTED] 6312

Ghislaine Maxwell

Date	Description	Debit	Credits	Balance
Jun 15	Fedwire Credit VIA: MELLON BANK N.A. DUE FROM BK M /043000261 B/O JEFFREY EPSTEIN ST THOMAS VI 00802 1348 REF CHASE NYC/CTR/BNF GHISLAINE MA XWELL NEW YORK NY 10022 /AC 0000000 07391 RFB O/B MELLON BANK BBI /TIME /15 32 IMAD 0615D3QCI20C005971		\$7,400,000.00	\$7,659,793.40
Jun 18	Internal Funds Transfer FUNDS TRANSFERRED FROM DDA AC# [REDACTED] [REDACTED] 6312 TO DDA AC# [REDACTED] 4324 As reque sted	\$7,400,000.00		\$259,793.40

June 01, 2007 -
June 29, 2007

Ghislaine Maxwell

Primary Account Number: [REDACTED] 6312

JPMorgan
Private Bank

GOVERNMENT
EXHIBIT
502
S2 20 Cr. 330 (AJN)

Page 2 of 8

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Account Number [REDACTED] 6312

Ghislaine Maxwell

Jun 15

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Jun 18	Internal Funds Transfer FUNDS TRANSFERRED FROM DDA AC# [REDACTED] [REDACTED] 6312 TO DDA AC# [REDACTED] 4324 As reque sted	\$7,400,000.00		\$259,793.40

GHISLAINE MA

XWELL

\$7,400,000.00

June 01, 2007 -
June 29, 2007

Page 2 of 4

AIR GHISLAINE INC

Primary Account Number: [REDACTED] 4324

JPMorgan 
Private Bank

GOVERNMENT
EXHIBIT
501
S2 20 Cr. 330 (AJN)

Date	Description	Debit	Credits	Balance
Jun 18	Internal Funds Transfer FUNDS TRANSFERRED FROM DDA AC# [REDACTED] [REDACTED] 6312 TO DDA AC# [REDACTED] 4324 As requested		\$7,400,000.00	\$7,482,133.42
Jun 18	Book Transfer A/C SIKORSKY AIRCRAFT CORP STRATFORD CT 06614 1378 ORG: [REDACTED] 4324 AIR GHISLAINE INC REF RE PURCHASE OF A GREEN HELICOPTER SIKORSKY S76C AND DOWNPAYMENT ON EXECUTIVE FINISH	\$7,352,825.00		\$129,308.42

Count One: Conspiracy to Violate Federal Law

Count Two: Enticement to Engage in Illegal Sexual Activity

Count Three: Conspiracy to Violate Federal Law

Count Four: Transportation of an Individual Under the Age of 17 to Engage in Illegal Sexual Activity

Count Five: Conspiracy to Violate Federal Law

Count Six: Sex Trafficking of an Individual Under the Age of 18

Counts Two, Four, and Six: Aiding and Abetting

1. Another person actually committed the offense with which the defendant is charged; and
2. The defendant aided, abetted, counseled, commanded, induced or procured that person to commit the crime.

Count Two: Enticement to Engage in Illegal Sexual Activity

1. The Defendant knowingly persuaded or induced or enticed or coerced an individual to travel in interstate commerce;
2. The individual traveled in interstate commerce; and
3. The Defendant acted with the intent that the individual would engage in sexual activity for which any person can be charged with a criminal offense under New York law.

Count Four: Transportation of an Individual Under the Age of 17 to Engage in Illegal Sexual Activity

1. The Defendant knowingly transported an individual in interstate commerce;
2. The Defendant transported the individual with the intent that the individual would engage in sexual activity for which any person can be charged with a criminal offense under New York law; and
3. The Defendant knew that the individual was less than 17 years old.

Count Six: Sex Trafficking of an Individual Under the Age of 18

1. The Defendant knowingly recruited, enticed, harbored, transported, provided, or obtained a person;
2. The Defendant knew that the person was under the age of 18;
3. The Defendant knew that the person would be caused to engage in a commercial sex act; and
4. The Defendant's acts were in or affecting interstate commerce.

Counts One, Three, and Five

1. Two or more persons entered the unlawful agreement charged in the particular count of the Indictment;
2. The Defendant knowingly and willfully became a member of that conspiracy;
3. One of the members of the conspiracy knowingly committed at least one overt act; and
4. The overt act was committed to further some objective of that conspiracy.

The core memory of trauma is stronger than other types of memory, right?

A. There are studies that show typically people can remember a core event and some core details, support for that proposition, yes.

Q. You wrote that: When asked about something difficult,
nothing has been difficult for me; correct?

A. I guess I did.

April 9, 2019

1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X

SHELDON BARR and THOMAS GARDNER,
Plaintiffs,

-against-

CITY OF NEW YORK and 116 EAST 65TH
STREET, LLC,

Defendants,

INDEX NO.: 159225/2010

-----X

535 Fifth Avenue
New York, New York
April 9, 2019
10:07 a.m.

EXAMINATION BEFORE TRIAL of the Defendant,
116 EAST 65TH STREET, LLC, by GHISLAINE MAXWELL, in
the above-entitled action, held at the above time
and place, taken before a Notary Public of the State
of New York, pursuant to Order and Stipulations
between Counsel.



April 9, 2019

Q. Please state your name for the record.

A. Ghislaine Maxwell.

Q. Please state your address for the record.

A. 44 Kinnerton Street, London, England

SW183X.

333 Fifth Avenue

New York, New York

April 9, 2019

Q. The address that you just gave the Court

Reporter, how long have you lived there?

A. '92, '93.