

US vs. Ghislaine Maxwell

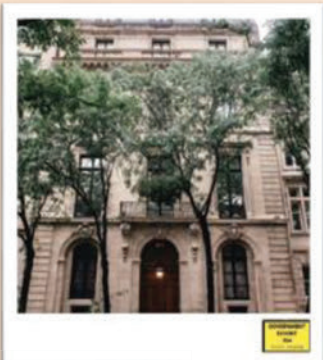
Closing Argument

MONEY

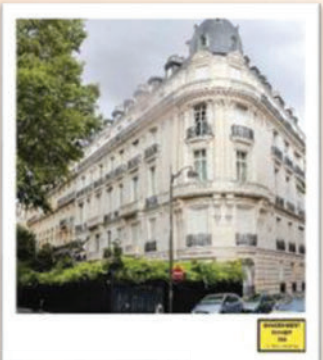
MANIPLULATION

MEMORY

EPSTEIN'S HOUSES



GX-704



GX-705



GX-217



GX-212



GX-214



GX-328



GX-323



GX-706

EPSTEIN'S CARS



GX-208

GOVERNMENT
EXHIBIT
208
SI 20 C 330 JAW

EPSTEIN'S PLANES



GOVERNMENT
EXHIBIT
811

GX-301



GOVERNMENT
EXHIBIT
812

GX-302



GOVERNMENT
EXHIBIT
813

GX-303



GOVERNMENT
EXHIBIT
814

GX-311



GOVERNMENT
EXHIBIT
812

GX-312



GOVERNMENT
EXHIBIT
315

GX-315



GOVERNMENT
EXHIBIT
126

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EPSTEIN'S HELICOPTERS



GOVERNMENT
EXHIBIT
344
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GX-344



GOVERNMENT
EXHIBIT
345
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GX-345

EPSTEIN'S BANK ACCOUNTS

09 2012 JPMorgan Chase Bank, 387 Park Avenue, New York, NY 10016-0002 JPMorgan Private Bank

Account Number: 201-1 JEFFREY EPSTEIN

Asset Account Portfolio September 01, 2012 - September 30, 2012 Page 6 of 8

Account Transactions

Cash Activity Summary

	Amount	Amount
	USD	USD
Beginning Balance	00	
Credits		
Dividends	21,043.46	21,043.74
Taxable Interest	949.19	949.09
Interest Received	00	00
Transfers Received	8,000,000.00	8,000,000.00
Other	00	00
Debits		
Service Account Purchases	-21,043.46	-21,043.36
Purchases of Securities	-21,983.37	-21,983.30
Withdrawals/Disbursements	-8,000,000.00	-8,000,000.00
ENDING BALANCE	00	24,767,645.14

*Fee to date information is disclosed on a separate page sheet.

Activity by Date

Date	Type	Amount	Balance
09/01	Dividend	21,043.46	21,043.74
09/01	Interest	949.19	21,992.89
09/01	Transfer	8,000,000.00	29,992.89
09/01	Service Account Purchase	-21,043.46	8,949.43
09/01	Purchase of Securities	-21,983.37	-13,033.94
09/01	Withdrawal/Disbursement	-8,000,000.00	-18,033.94

GX-504
PAGE 6

8,000,000.00

18,000,000.00

24,767,645.14

09 2012 JPMorgan Chase Bank, 387 Park Avenue, New York, NY 10016-0002 JPMorgan Private Bank

Account Number: 201-1 JEFFREY EPSTEIN

Asset Account Portfolio September 01, 2012 - September 30, 2012 Page 7 of 8

Activity by Date

Date	Type	Amount	Balance
09/01	Dividend	21,043.46	21,043.74
09/01	Interest	949.19	21,992.89
09/01	Transfer	8,000,000.00	29,992.89
09/01	Service Account Purchase	-21,043.46	8,949.43
09/01	Purchase of Securities	-21,983.37	-13,033.94
09/01	Withdrawal/Disbursement	-8,000,000.00	-18,033.94
09/01	Transfer	2,000,000.00	-16,033.94
09/01	Service Account Purchase	-21,043.46	-16,244.40
09/01	Purchase of Securities	-1,000,000.00	-17,244.40
09/01	Withdrawal/Disbursement	-1,000,000.00	-18,244.40

GX-504
PAGE 7

2,000,000.00

1,000,000.00

09 2012 JPMorgan Chase Bank, 387 Park Avenue, New York, NY 10016-0002 JPMorgan Private Bank

Account Number: 201-1 JEFFREY EPSTEIN

Asset Account Portfolio September 01, 2012 - September 30, 2012 Page 8 of 8

Activity by Date

Date	Type	Amount	Balance
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09/01	Purchase of Securities	-21,983.37	-13,033.94
09/01	Withdrawal/Disbursement	-8,000,000.00	-18,033.94
09/01	Transfer	5,000,000.00	-13,033.94
09/01	Service Account Purchase	-21,043.46	-13,244.40
09/01	Purchase of Securities	-1,000,000.00	-14,244.40
09/01	Withdrawal/Disbursement	-1,000,000.00	-15,244.40

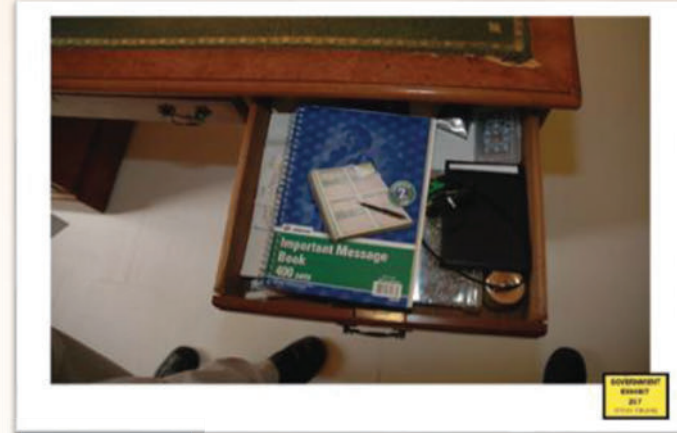
GX-504
PAGE 8

5,000,000.00

EPSTEIN'S MESSAGE PADS



GX-256



GX-257



GX-262

EPSTEIN'S FLIGHT LOGS

DATE MM/YY	AIRCRAFT TYPE AND MODEL	AIRCRAFT REGISTRATION MARK	POINTS OF DEPARTURE & ARRIVAL		WHEEL FAULTS	FLY HR	SCHEDULED PASSENGERS MANIFESTED PASSENGERS	AIRCRAFT CATEGORIES					
			FROM	TO				125	126	127	128		
6	H4372	N1888L	BOS	TEB		5:05							
6	"	"	TEB	PBI		5:04							
9	"	"	PBI	SAV		5:07							
9	"	"	SAV	TXKF		5:08							
10	"	"	TXKF	TEB		5:08							
13	"	"	TEB	DCA		5:10							
14	"	"	PBI	MYGE		5:12							
14	"	"	MYGE	PBI		5:13							
15	"	"	PBI	MYD		5:14							
15	"	"	MYD	PBI		5:15							
15	"	"	PBI	DCA		5:16							
15	"	"	DCA	TEB		5:17							
20	"	"	TEB	JFK		5:18							
20	"	"	JFK	PBI		5:19							
22	"	"	PBI	CMH		5:20							
23	"	"	CMH	TEB		5:21							
24	"	"	TEB	MDW		5:23							

I certify that the statements made by me on this form are true.

PILOT SIGNATURE: Daniel Epstein

PAID TOTAL: \$207.00
 AMT. FORWARD: \$103.50
 TOTAL TO DATE: \$1035.00

GX-662
PAGE 27

DATE MM/YY	AIRCRAFT TYPE AND MODEL	AIRCRAFT REGISTRATION MARK	POINTS OF DEPARTURE & ARRIVAL		WHEEL FAULTS	FLY HR	SCHEDULED PASSENGERS MANIFESTED PASSENGERS	AIRCRAFT CATEGORIES					
			FROM	TO				125	126	127	128		
25	G1159	N1888L	BOS	TEB		5:25							
25	"	"	TEB	PBI		5:25							
25	"	"	PBI	MDW		5:27							
25	"	"	MDW	TEB		5:27							
25	"	"	TEB	SDF		5:28							
25	"	"	SDF	PBI		5:28							
25	"	"	PBI	TEB		5:28							
25	"	"	TEB	DCA		5:29							
25	"	"	DCA	TEB		5:29							
25	"	"	TEB	BOS		5:30							
25	"	"	BOS	TEB		5:30							
25	"	"	TEB	TEB		5:30							
25	"	"	CMH	SAV		5:31							
25	"	"	SAV	PBI		5:31							
25	"	"	PBI	TEB		5:32							
25	"	"	TEB	PBI		5:33							
25	"	"	PBI	TEB		5:34							

I certify that the statements made by me on this form are true.

PILOT SIGNATURE: Daniel Epstein

PAID TOTAL: \$417.00
 AMT. FORWARD: \$213.50
 TOTAL TO DATE: \$1248.00

GX-662
PAGE 28

DATE MM/YY	AIRCRAFT TYPE AND MODEL	AIRCRAFT REGISTRATION MARK	POINTS OF DEPARTURE & ARRIVAL		WHEEL FAULTS	FLY HR	SCHEDULED PASSENGERS MANIFESTED PASSENGERS	AIRCRAFT CATEGORIES					
			FROM	TO				125	126	127	128		
25	G1159	N1888L	BOS	TEB		5:35							
25	"	"	TEB	PBI		5:35							
25	"	"	PBI	MDW		5:37							
25	"	"	MDW	TEB		5:37							
25	"	"	TEB	SDF		5:38							
25	"	"	SDF	PBI		5:38							
25	"	"	PBI	TEB		5:39							
25	"	"	TEB	DCA		5:40							
25	"	"	DCA	TEB		5:40							
25	"	"	TEB	BOS		5:41							
25	"	"	BOS	TEB		5:41							
25	"	"	TEB	TEB		5:41							
25	"	"	CMH	SAV		5:42							
25	"	"	SAV	PBI		5:42							
25	"	"	PBI	TEB		5:43							
25	"	"	TEB	PBI		5:44							
25	"	"	PBI	TEB		5:44							

I certify that the statements made by me on this form are true.

PILOT SIGNATURE: Daniel Epstein

PAID TOTAL: \$417.00
 AMT. FORWARD: \$213.50
 TOTAL TO DATE: \$1661.50

GX-662
PAGE 30

EPSTEIN'S PRIVATE ISLAND



GOVERNMENT
EXHIBIT
246
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GX-346



GOVERNMENT
EXHIBIT
226
© 2013 DOJ

GX-326



GOVERNMENT
EXHIBIT
208
© 2013 DOJ

GX-308



GOVERNMENT
EXHIBIT
925-R
S2 20-C, 339 (A/F)

G X - 925



GOVERNMENT
EXHIBIT
926
S2 20-C, 339 (A/F)

G X - 926



GX-B07



GX-B24



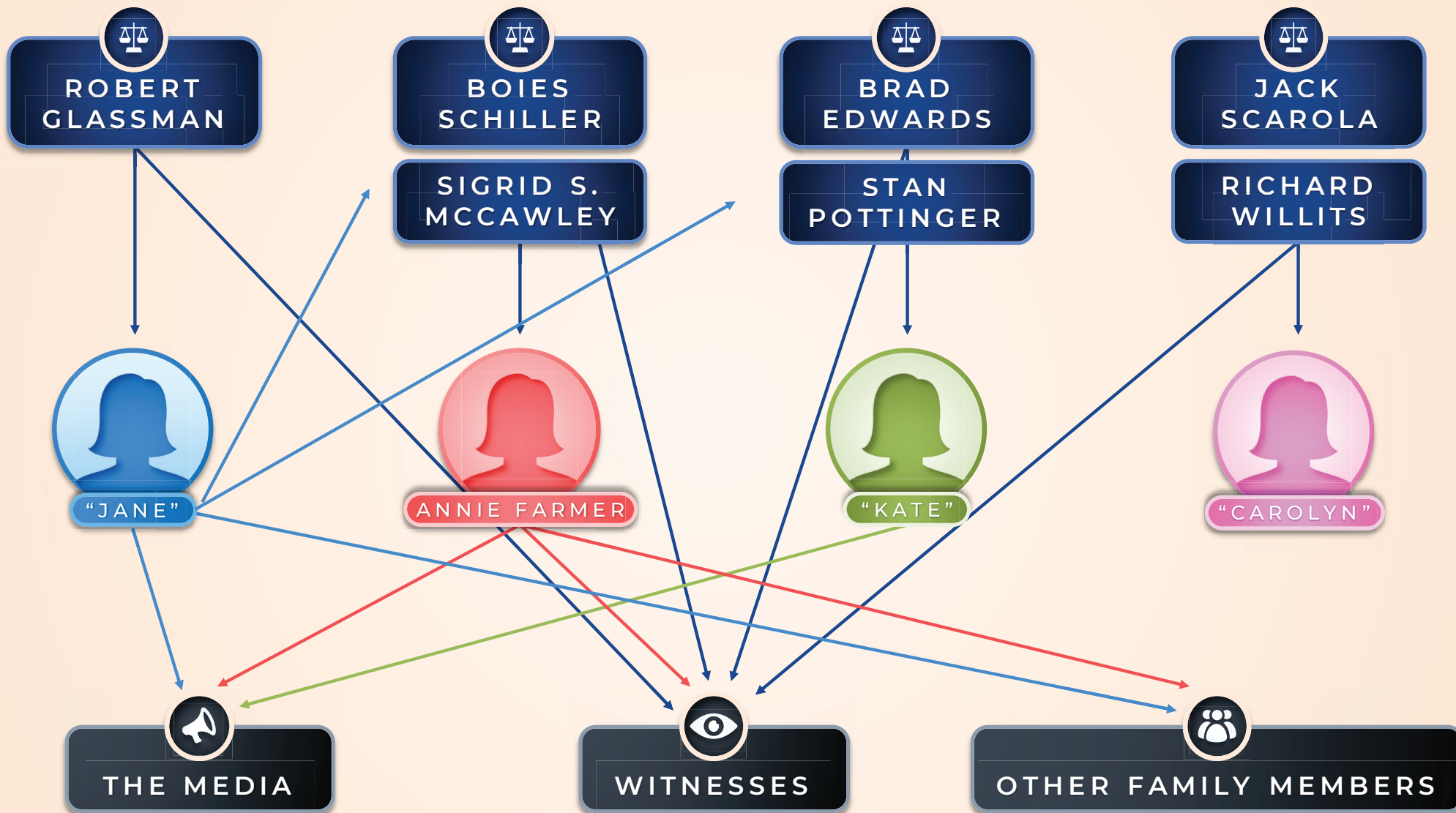
Glassman Told Jane That Cooperating Would “Help Her Case”

December 17, 2021

Stipulation

1. On August 17, 2021, Robert Glassman, counsel for the witness testifying using the pseudonym Jane, spoke by phone with a prosecutor in this case. The notes of the call reflect that:

2. Glassman stated that before the Government charged the case, Jane had discussed with Glassman whether to cooperate with the case, and during those conversations Glassman had advised Jane to cooperate and discussed with Jane that cooperating with the case was the morally right thing to do, and they had discussed how testifying at trial was the right thing to do. Glassman also mentioned that Glassman had told Jane it would “help her case.”



The Government Said You Would Hear From “Relatives Of The Victims”

Ms. Pomerantz: You'll hear from relatives from some of the victims. They will tell you about the victims spending time with the defendant and Epstein, traveling to meet the defendant and Epstein, and receiving phone calls from the defendant, all when those victims were between the ages of 14 and 17.

JANE

Jane Could Not Recall If Ghislaine Was Ever In A Room Alone With Her And Epstein

Q. When you spoke with the government at the February 2020 meeting, they asked you if there were times where it was just you, Epstein and Ghislaine in the room, and you said you were not sure, correct?

A. I don't recall.

12.01.2021 Trial Tr. at 475:7-11 (Jane)

Q. You said you don't recall whether or not you ever told the government that you and Ghislaine and Jeffrey were alone together in the room. You were not sure that ever happened. Do you recall that testimony?

A. I don't recall that, no.

12.01.2021 Trial Tr. at 478:8-12 (Jane)

Q. As you sit here today, you're not sure whether you were ever in the room alone with Ghislaine and Epstein, correct?

A. No.

12.01.2021 Trial Tr. at 479:8-12 (Jane)

Jane's Interrogatory Response Did Not Mention Ghislaine Was There

June 3, 2020
Plaintiff's Response

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INTERROGATORY NO. 9:

2 Identify all persons other than Decedent who have ever committed or
3 attempted to commit sexual misconduct or offenses against or otherwise concerning
4 you, including, without limitation, any unwelcome behavior of a sexual nature,
5 sexual abuse, sexual assault, threats or intimidation of a sexual nature, or sexual
6 exploitation, regardless of whether the misconduct or offenses involved physical
7 touching. For each person identified, identify the misconduct or offense committed,
8 and the date and location of the misconduct or offense.

9 **RESPONSE TO INTERROGATORY NO. 9:**

10 None.

GX-12



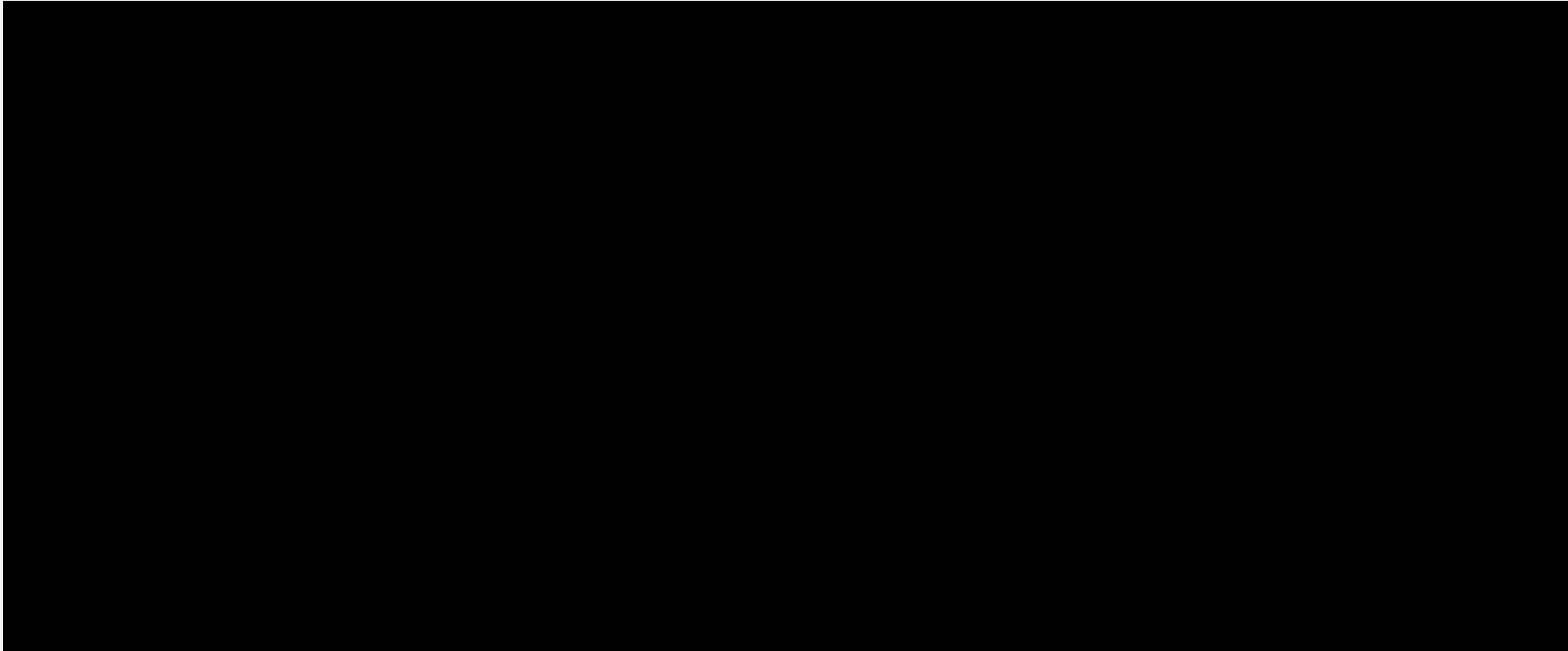
J-3

J-4

J-5

CBP Records Show Jane Returning From An International Trip At 15

December 12, 2021
Flight Records



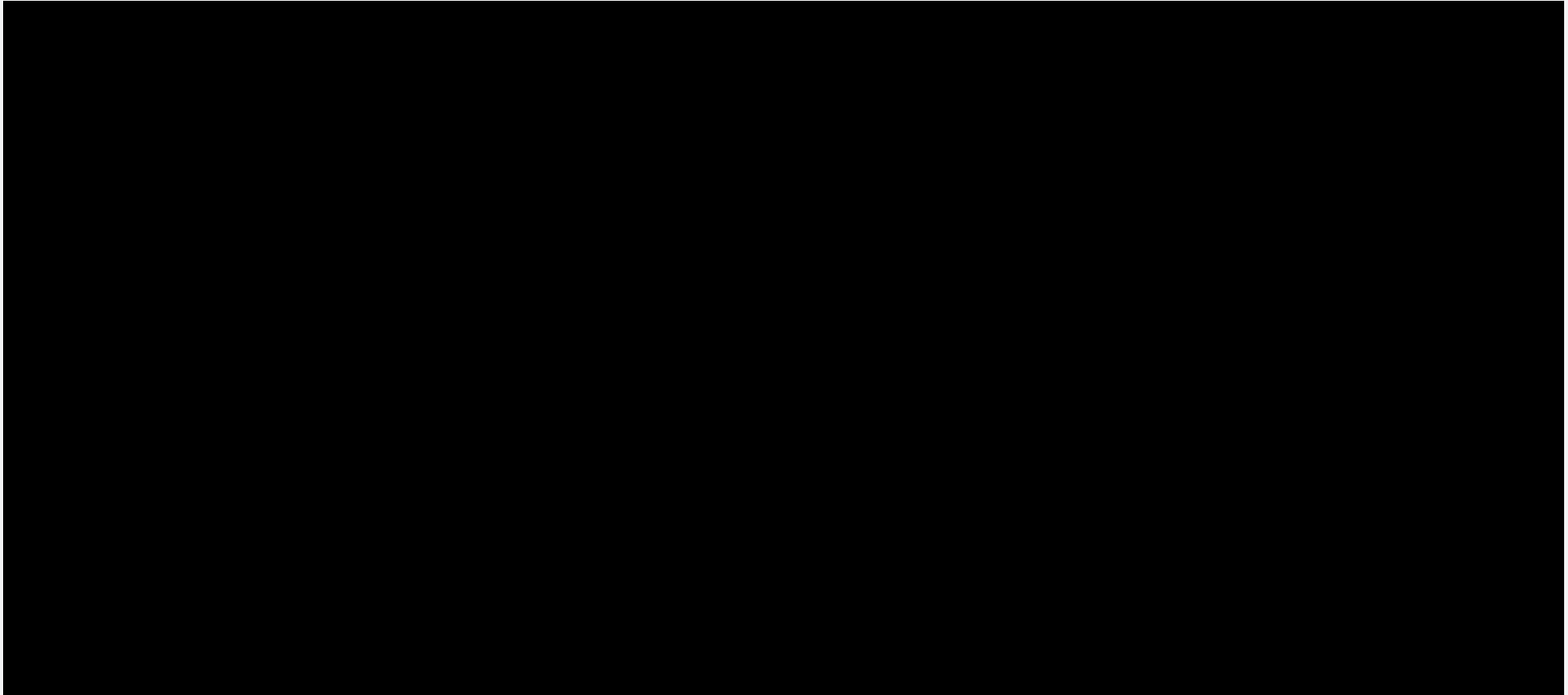
~~For Official Use Only / Law Enforcement Sensitive~~

2

Jane Represented No Individual Was Paying For Her To Go To Interlochen

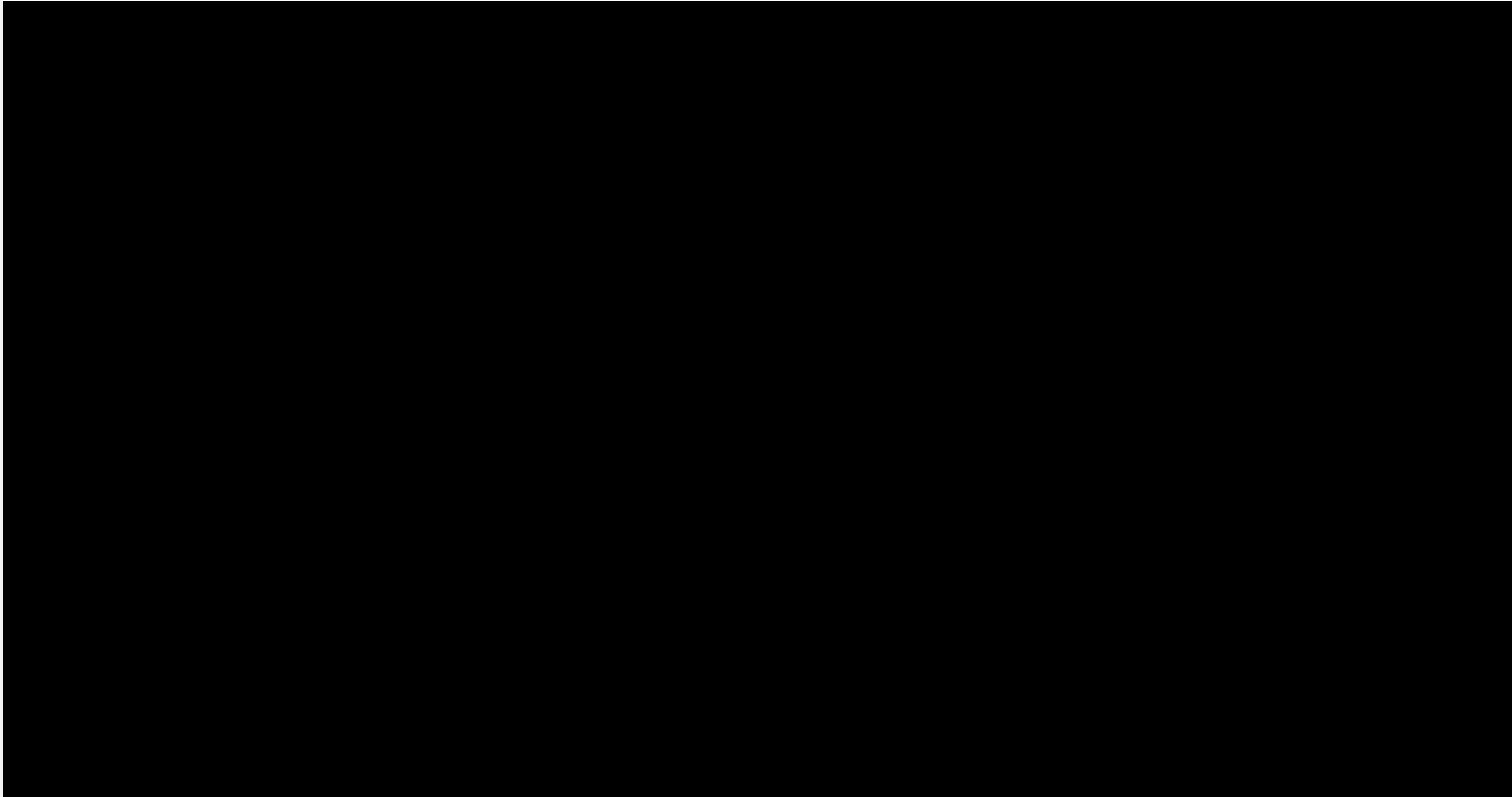
March 1, 1996

Application for Admission - Financial Info



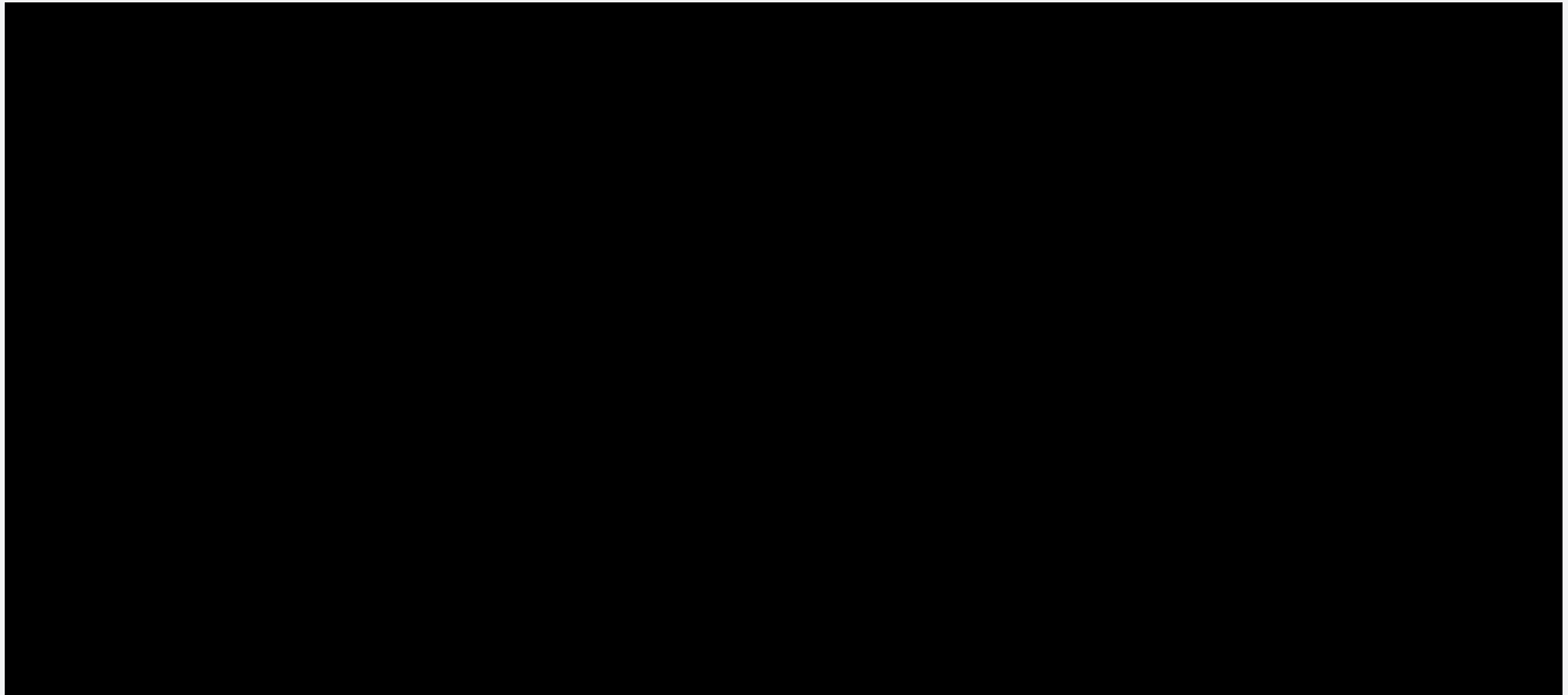
At 16, Jane Sued Her Teacher, Her Principal, And Her Guidance

November 17, 2021
Court's record



CBP Records Show Jane Returning From An International Trip At 16

December 12, 2021
Flight Records

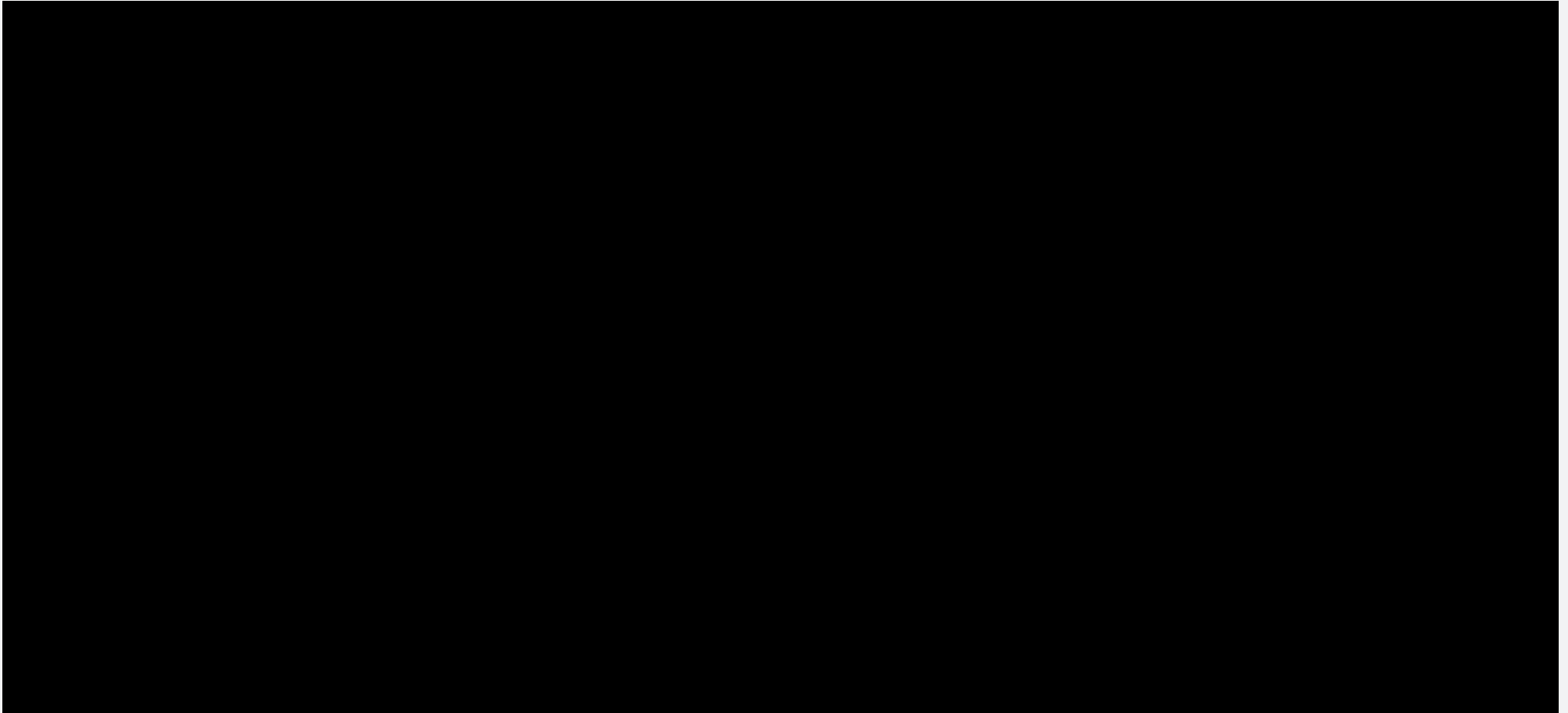


Lion King Is Released In November 1997

The parties hereby stipulate and agree that The Lion King, the Broadway musical, opened in previews at the New Amsterdam Theater in New York City on October 15th, 1997, with the official opening on November 13th, 1997.

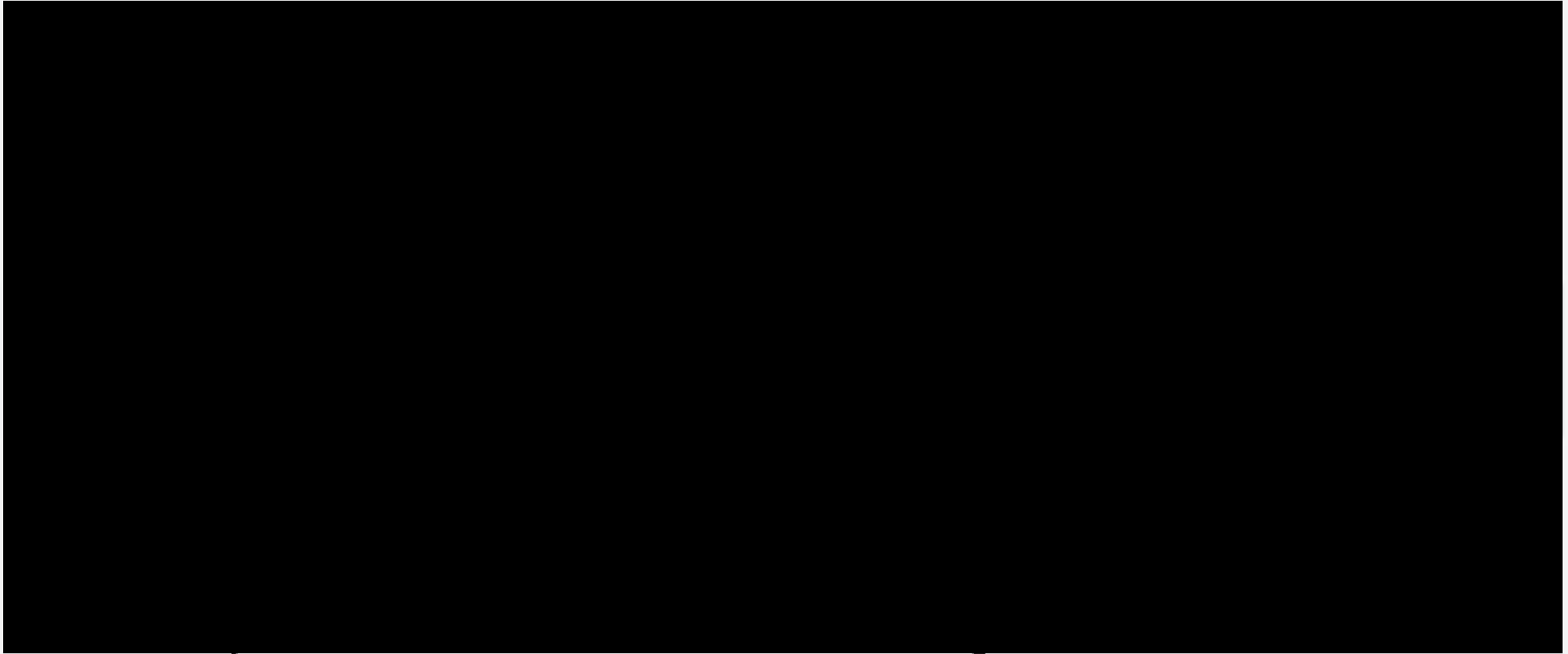
CBP Records Show Jane Returning From An International Trip At 17

December 12, 2021
Flight Records



Jane Sang Happy Birthday To Mike Wallace

Flight Logs



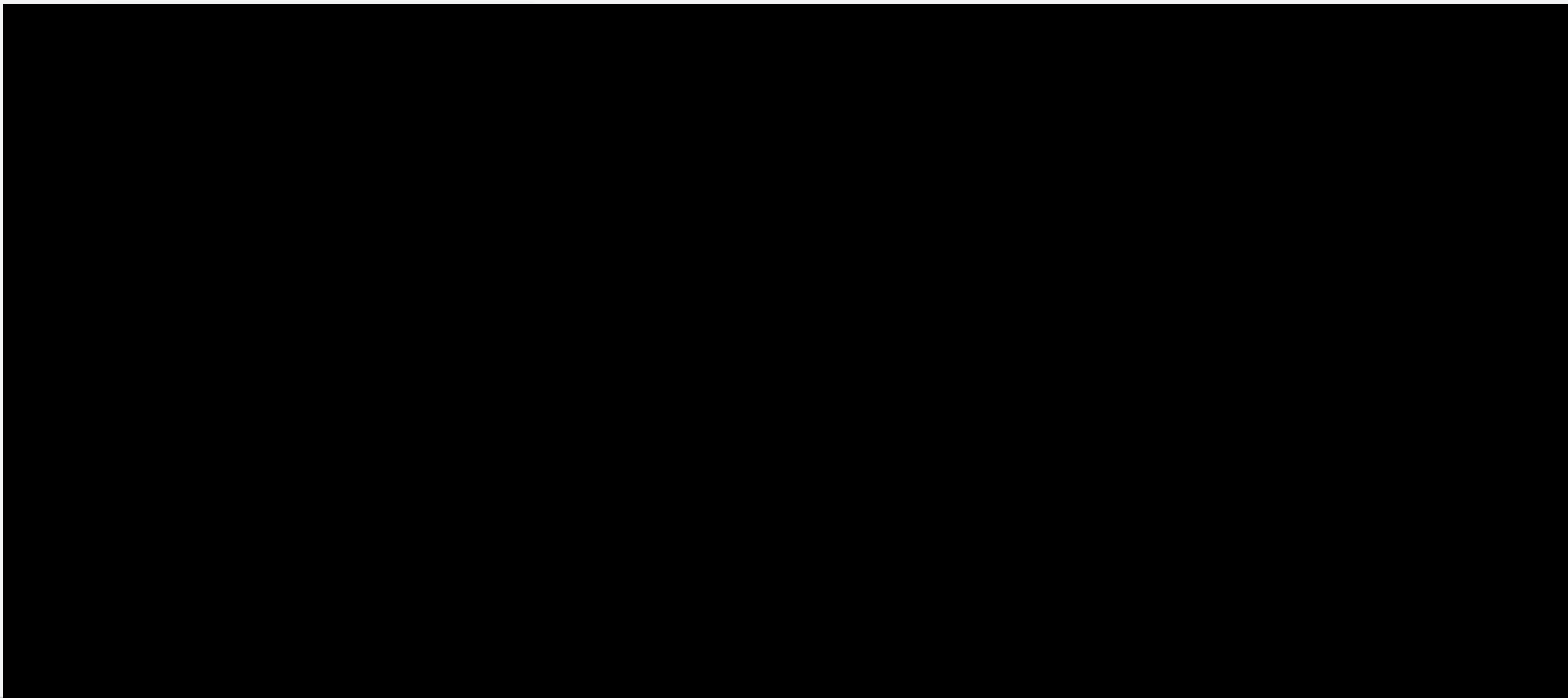
Jane Sang Happy Birthday To Mike Wallace

The parties hereby stipulate and agree that Mike Wallace's date of birth is May 9th, 1918.

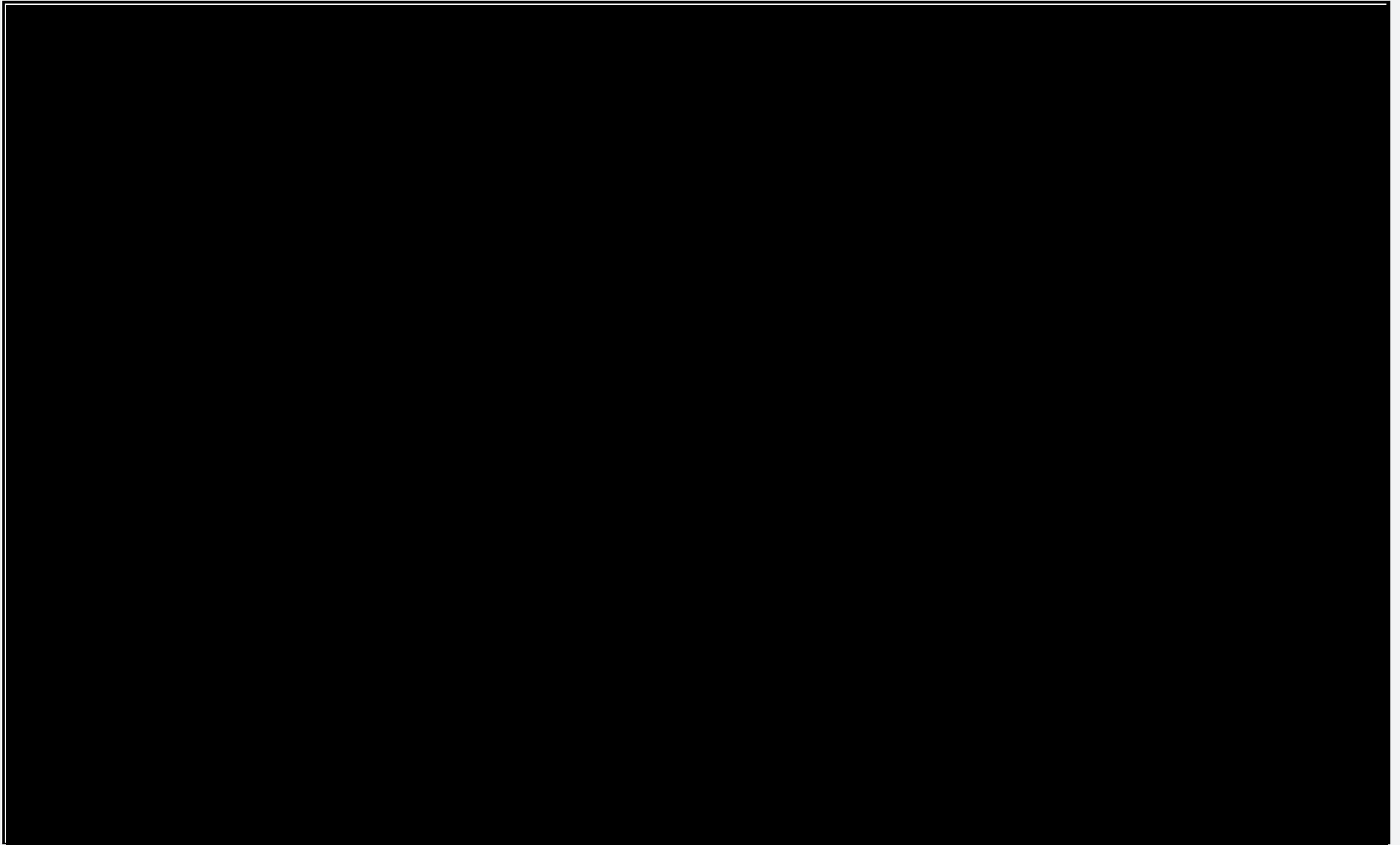
Jane Is 18 The First Time She Indicates In A Document That Epstein Will Pay For Her

June 25, 1998

Application to Professional Children's School

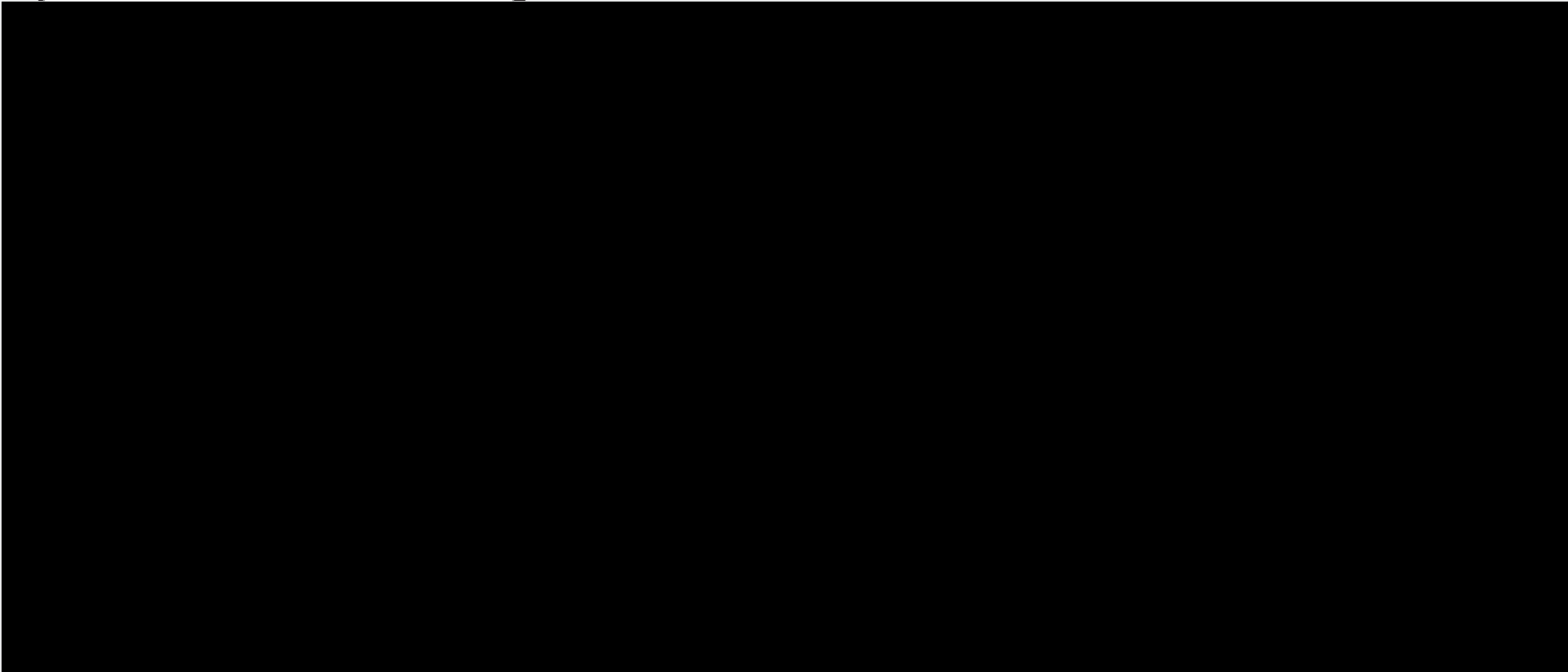


At 19, She Sends A Head Shot To Epstein



Jane Took Several Flights At Epstein's Expense When She's 19 And 20

April 17, 2000
Transactions



Jane Could Not Recall If Ghislaine Was Ever In A Room Alone With Her And Epstein

Q. When you spoke with the government at the February 2020 meeting, they asked you if there were times where it was just you, Epstein and Ghislaine in the room, and you said you were not sure, correct?

A. I don't recall.

12.01.2021 Trial Tr. at 475:7-11 (Jane)

Q. You said you don't recall whether or not you ever told the government that you and Ghislaine and Jeffrey were alone together in the room. You were not sure that ever happened. Do you recall that testimony?

A. I don't recall that, no.

12.01.2021 Trial Tr. at 478:8-12 (Jane)

Q. As you sit here today, you're not sure whether you were ever in the room alone with Ghislaine and Epstein, correct?

A. No.

12.01.2021 Trial Tr. at 479:8-12 (Jane)

JANE CAN'T REMEMBER BECAUSE IT DIDN'T HAPPEN

- ▶ "Not sure" if Ghislaine Maxwell ever touched her "during these encounters" (Tr. 475:22 – 476:1)
 - ▶ In December 2019 she said she does "not have a recollection and [is] not sure if Ghislaine touched you during these encounters" (Tr. 480:2-5)
 - ▶ At trial, she said she "doesn't remember but it's written here" (Tr. 480:6-8)
- ▶ "Not sure that Maxwell ever kissed [her]" (Tr. 476:2-4)
- ▶ Doesn't recall Ghislaine ever giving her a talk about how to massage Jeffrey Epstein (Tr. 476:8-10)

JANE CAN'T REMEMBER BECAUSE IT DIDN'T HAPPEN

But she was clear about a number of other things that Ghislaine never did see:

- ▶ Ghislaine never saw her perform oral sex on Epstein (480-81)
- ▶ Ghislaine never saw her perform hand jobs on Epstein (475-76)
- ▶ GM never used sex toys on her (475-76)
- ▶ GM never saw her have intercourse with JE (475-76)
- ▶ She has no memory of Ghislaine being present when Epstein engaged in sexual contact with her (477 – "don't remember")

Testimony of Jane – Direct Examination

Q. Approximately how many times during the years that you were 14 and 15 and 16 was Ghislaine Maxwell in the room while you were being sexually abused by Jeffrey Epstein?

A. I don't know.

Testimony of Jane – Direct Examination

Q. Was Maxwell in the room just once while you were being sexually abused by Jeffrey Epstein?

A. No.

Q. Was it just twice?

A. No.

Q. Approximately how many times?

A. I don't know, but more than twice.

Testimony of Jane – Cross Examination

Q. Married a racecar driver?

A. Yes.

Q. She joined in the sexual massages, correct?

A. Correct.

Testimony of Jane – Cross Examination

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

A. Correct.

Q. You said she joined in with Sophie, right?

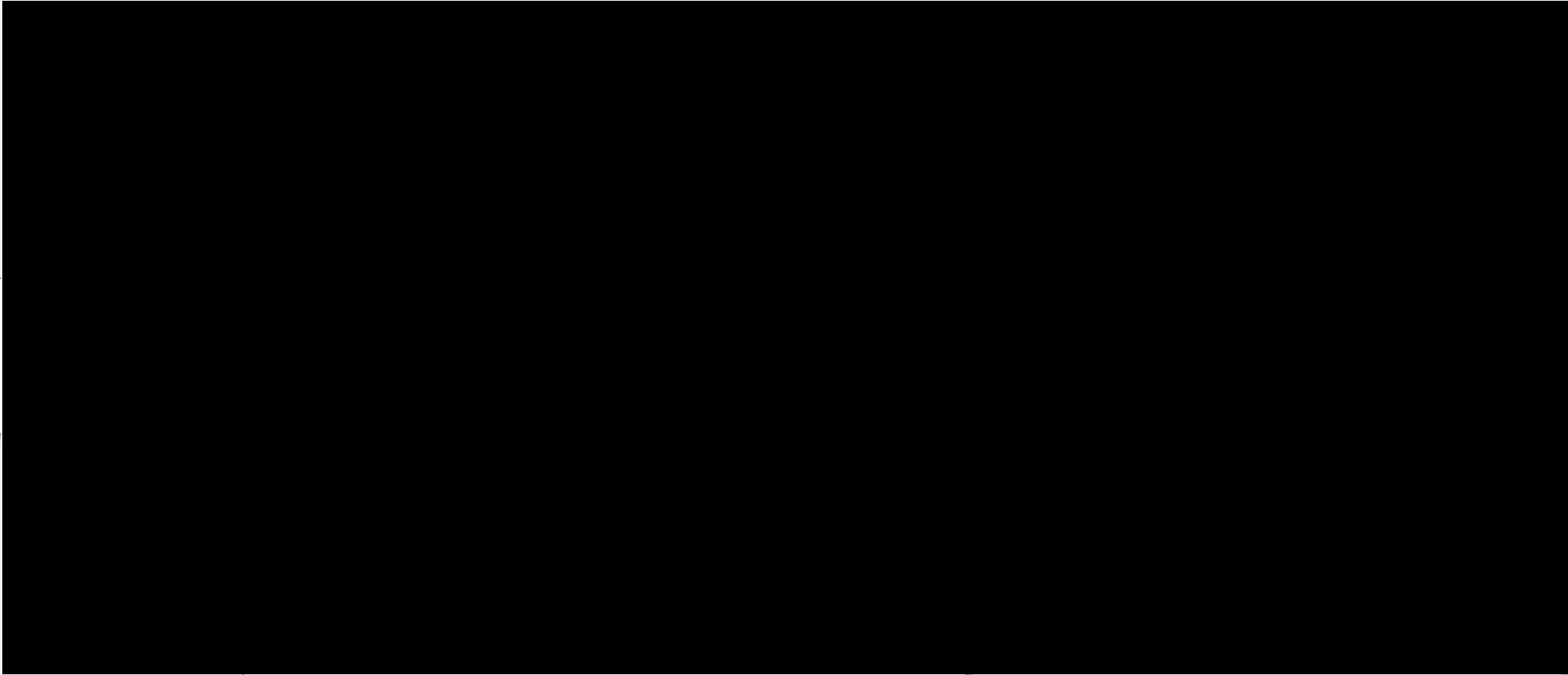
A. What's the exact question joined in with Sophie?

Q. Those were your words.

A. Yes.

November 11, 1996 Flight With Sophie And Eva

Nov. 11, 1996
Flight Log



Testimony of Jane – Cross Examination

Q. You talked about a third woman named Emmy, who was a participant in the abuse, correct?

A. Correct.

Q. You said that Emmy was British?

A. Yes.

Q. And she was nice and cool, right?

A. Yes.

Q. And she was involved in the sexual contact, right?

A. Yes.

Q. And she was in these group sexualized massages with you, correct?

A. Yes.

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

A. Yes.

Q. Michelle was short?

A. Yes.

Testimony of Jane – Cross Examination

Q. You hung out with her and Emmy?

A. Yes.

Q. And you sometimes went out with them, right?

A. Yes.

Q. And you claimed that Michelle was also involved in the sexual contact, correct?

A. Yes.

Q. And the group massages?

A. Yes.

Jane Described The Palm Beach "Massage Room"

Q. Sorry.

A. It was -- it looked like maybe it was light, because it was off the master bedroom, which was sort of -- it had like a beachy feel.

Q. What was in the room?

A. I don't think I saw anything past the massage table.

12.01.2021 Trial Tr. at 314:10-15 (Jane)

Q. You recall a massage room that was attached to the bathroom; correct?

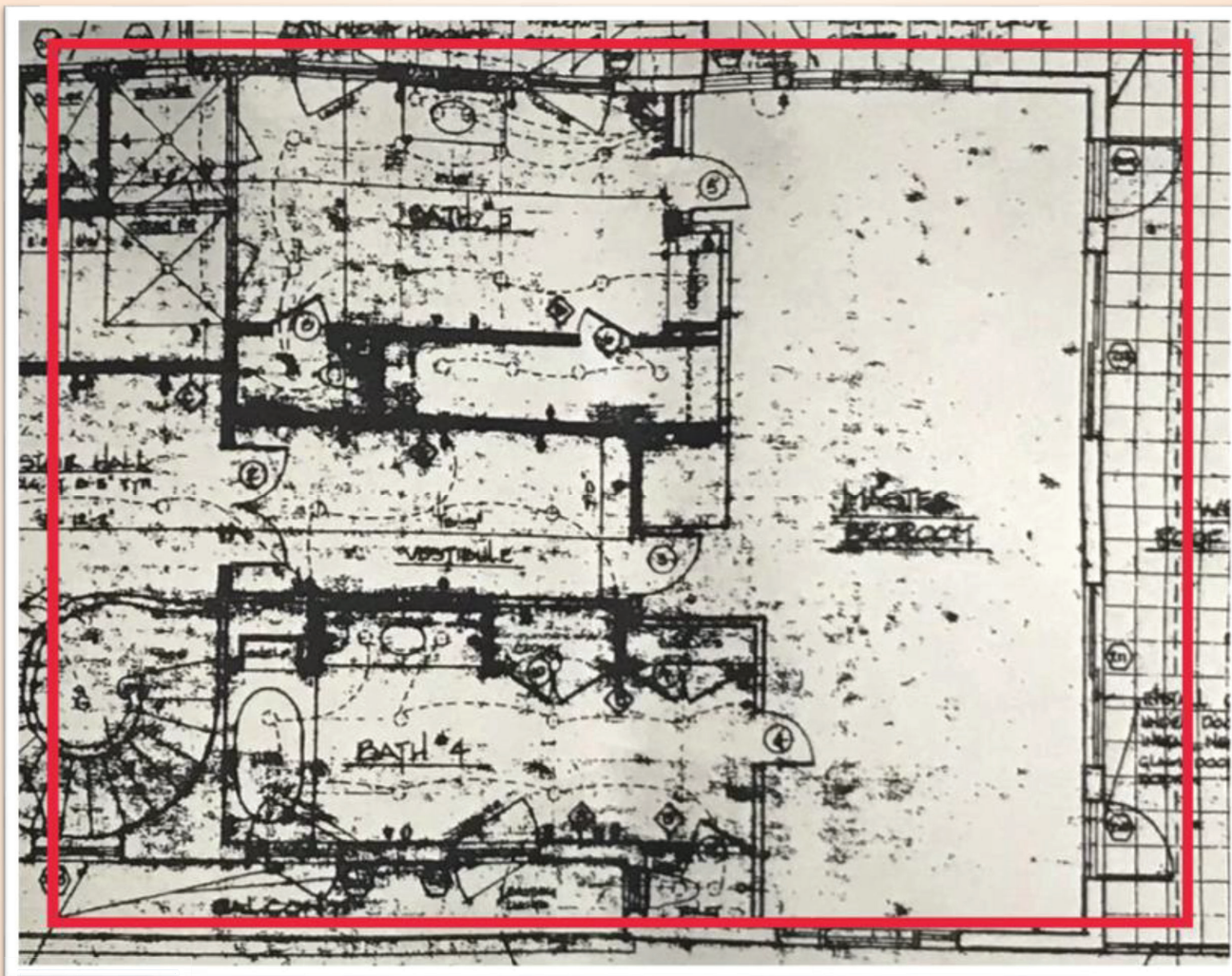
A. That's my memory, yes.

12.01.2021 Trial Tr. at 517:1-3 (Jane)



**GOVERNMENT
EXHIBIT
281-R**
S2.20 Cr. 330 (AJN)

GX-281



GX-297

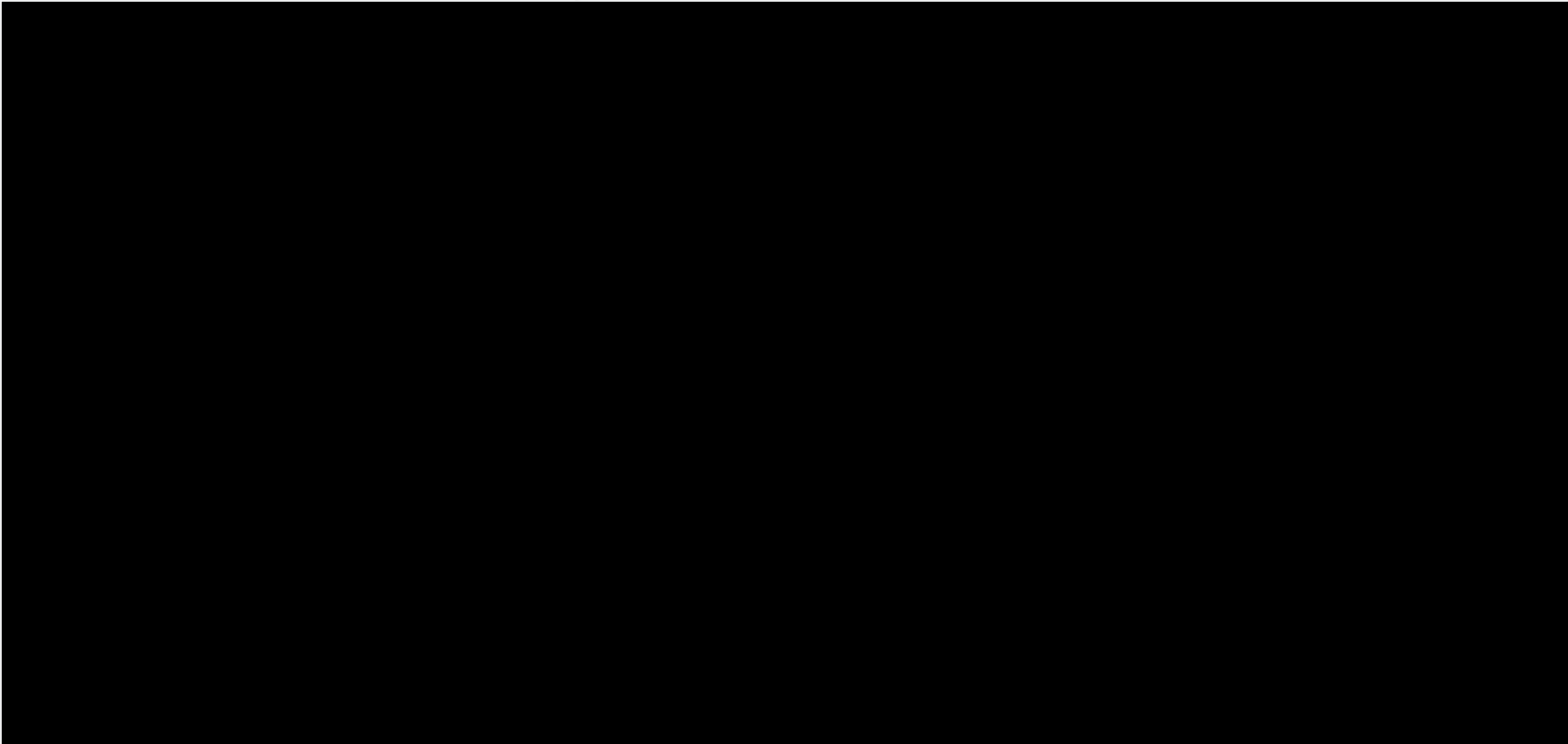


CX-278

Interlochen records show that Jane did not move into the 3-bedroom house Until 1996

March 1, 1996

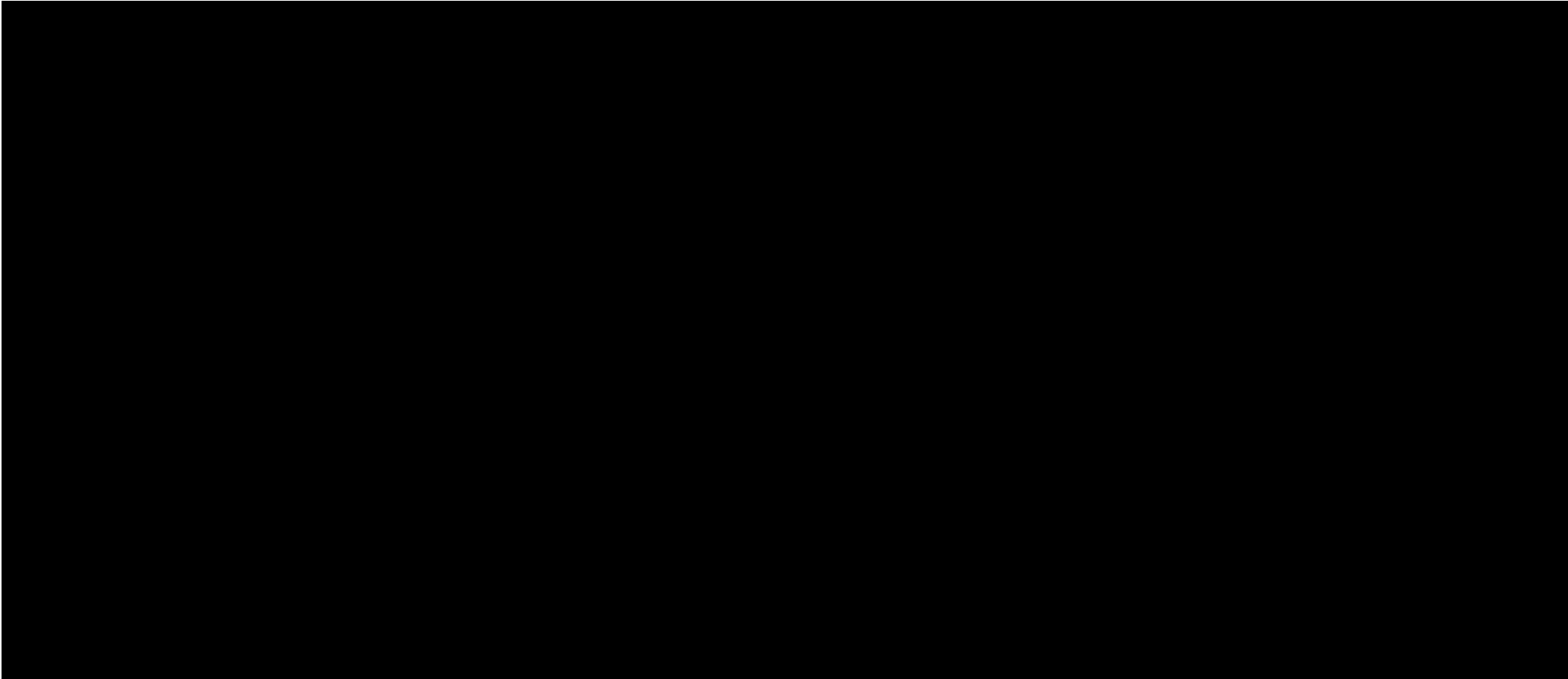
Application for Admission - Financial Info



Jane Represented No Individual Was Paying For Her To Go To Interlochen

March 1, 1996

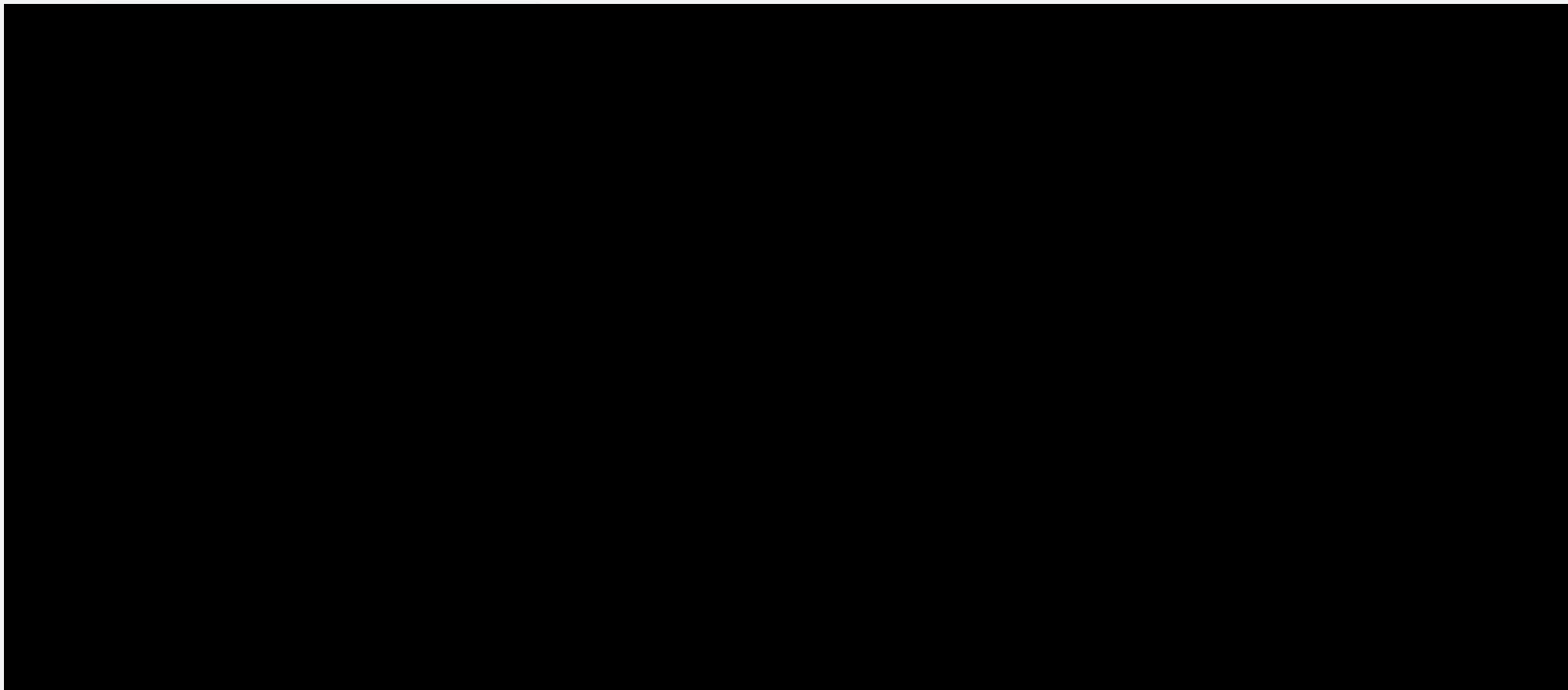
Application for Admission - Financial Info



Jane Is 18 The First Time She Indicates In A Document That Epstein Will Pay For Her

June 25, 1998

Application to Professional Children's School



Lawyers Told Jane That Cooperating Would “Help Her Case”

December 17, 2021

Stipulation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA

- v. -

STIPULATION

2. Glassman stated that before the Government charged the case, Jane had discussed with Glassman whether to cooperate with the case, and during those conversations Glassman had advised Jane to cooperate and discussed with Jane that cooperating with the case was the morally right thing to do, and they had discussed how testifying at trial was the right thing to do. Glassman also mentioned that Glassman had told Jane it would “help her case.”

S2 20 Cr. 330 (AJN)
Defendant's Ex. A-6

Jane Said Epstein (And Not Ghislaine) Abused Her

June 3, 2020
Plaintiff's Response

PANISHSHELL & BOYLE LLP
1111 S. LA BREA AVE., SUITE 2000
LOS ANGELES, CALIFORNIA 90025
310.471.7000 ext. 310.471.7000 fax

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9 exect
10 JEFF
11 MAN
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23 Party
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1 **INTERROGATORY NO. 9:**

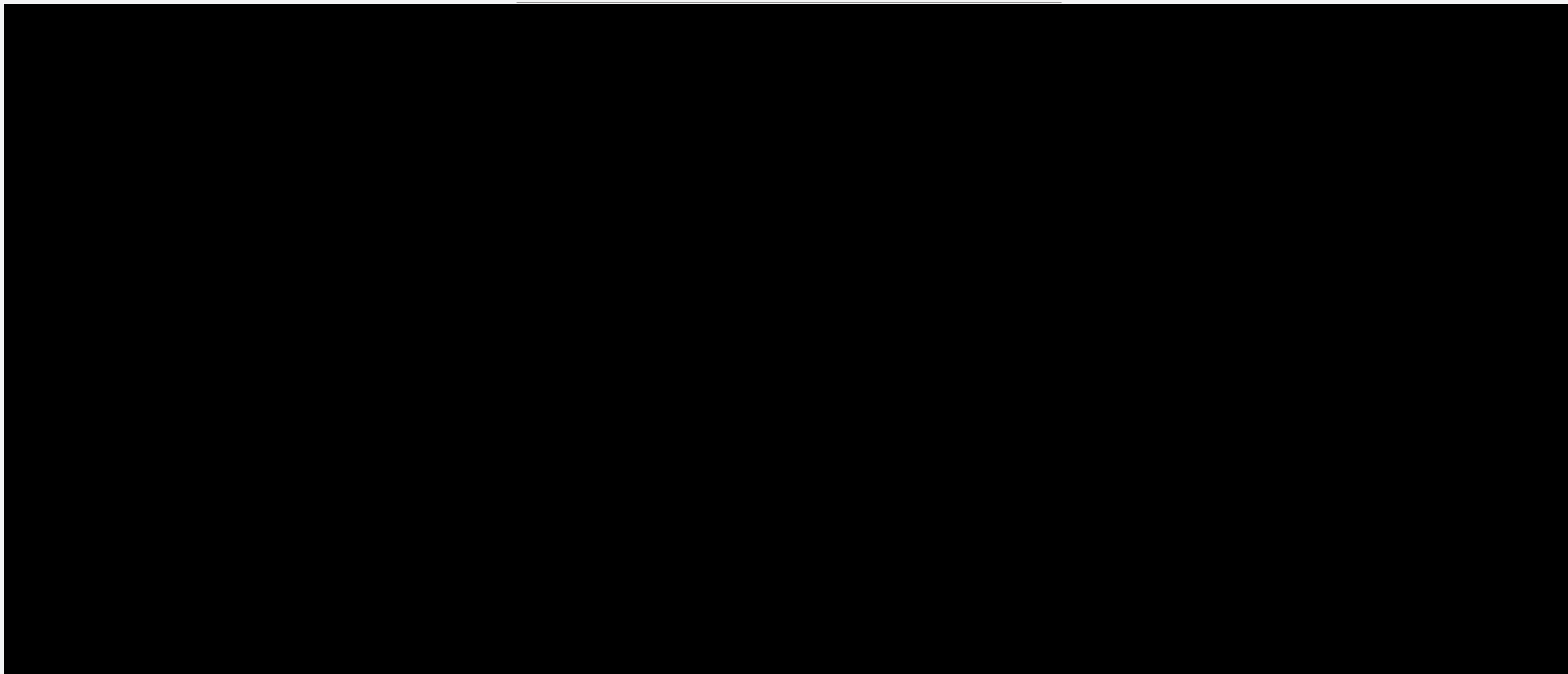
2 Identify all persons other than Decedent who have ever committed or
3 attempted to commit sexual misconduct or offenses against or otherwise concerning
4 you, including, without limitation, any unwelcome behavior of a sexual nature,
5 sexual abuse, sexual assault, threats or intimidation of a sexual nature, or sexual
6 exploitation, regardless of whether the misconduct or offenses involved physical
7 touching. For each person identified, identify the misconduct or offense committed,
8 and the date and location of the misconduct or offense.

9 **RESPONSE TO INTERROGATORY NO. 9:**

10 **None.**

Jane Was Awarded \$5 Million

November 30, 2020
EVPC General Release



ANNIE FARMER

Limiting Instruction on Ms. Farmer's Testimony

I anticipate that you'll hear testimony from the next witness about physical contact that she says she had with Mr. Epstein and Ms. Maxwell in New Mexico. I instruct you that the alleged physical contact she says occurred with Mr. Epstein and Ms. Maxwell in New Mexico was not, quote, illegal sexual activity, end quote, as the government has charged in the...

Limiting Instruction on Ms. Farmer's Testimony

However, to the extent you conclude that her testimony is relevant to the issues before you, you may consider it, but you may not consider this testimony as any kind of reflection on Mr. Epstein's nor Ms. Maxwell's character or propensity to commit any of the crimes charged in the document.

Testimony of Annie Farmer – Cross Examination

Q. You understood or hoped that he might help get you into college; correct?

A. And pay for college, yes.

Q. And you understood and hoped that he might help you pay for college; correct?

A. Yes.

In NY, Farmer Spent 99% Of Her Time With Her Sister Doing NY Visitor Activities

93

Jun 25, 1946

It has been a couple of weeks since I got back & I have gotten back into the swing of things. A couple of quick details about NY I didn't mention earlier - went to see The Duchess a decent play, & Blue Man group Tubes - off Broadway really cool production. Went to the flea market where I got some cool stuff, went to Jeffrey ~~Epstein's~~ Epstein's mansion, went to the Met, a pretty fun New Year's Eve party, went to thrift stores where I got an amazing dress for prom, it's from the 'fifties, lace with pink flowers

Testimony of Annie Farmer – Cross Examination

Q. You do know that there was no sexual activity that occurred while you were in Mr. Epstein's home; correct?

A. That's correct.

Testimony of Annie Farmer – Cross Examination

Q. No physical contact happened with you in that home?

A. That's correct.

Q. No one showed you any vibrators or massagers or anything like that in that home?

A. No.

Testimony of Annie Farmer – Cross Examination

Q. And regardless, Ghislaine Maxwell was not present in Mr. Epstein's home while you were there; right?

A. Correct.

Testimony of Annie Farmer – Cross Examination

Q. ...So what you told the victims compensation fund is that you were sexually abused in a movie theater in New York, right?

A. Right.

Testimony of Annie Farmer – Cross Examination

Q. And Ghislaine Maxwell was not at the movie theater; right?

A. That's right.

Testimony of Annie Farmer – Direct Examination

Q. Did you meet Maxwell during this trip to New York?

A. I did not.

Testimony of Annie Farmer – Cross Examination

Q. Ghislaine Maxwell had no role in the logistics of your travel to New York; correct?

A. That's correct.

Q. She did not fly you there?

A. No.

Q. She didn't buy you a ticket to go here?

A. She did not.

Q. She didn't arrange for your travel?

A. No.

Q. She didn't call your mother before you traveled to New York?

A. To New York, no.

Q. She didn't encourage you to travel to New York?

A. She did not.

Q. She did not transport you to New York?

A. That's correct.

Testimony of Annie Farmer – Cross Examination

Q. You had never seen her before you came to New York?

A. That's correct.

Q. You had never talked to her before you came to New York?

A. Yes.

Testimony of Annie Farmer – Cross Examination

Q. And, again, Ghislaine Maxwell wasn't a part of this conversation at Epstein's home; right?

A. She was not.

Q. He didn't even mention her during this trip to his home; correct?

A. That, I don't remember.

Testimony of Annie Farmer – Direct Examination

Q. She simply was not here the entire time you were in New York; right?

A. That's correct.

Testimony of Annie Farmer – Cross Examination

Q. And for the avoidance of all doubt, there is no entry in any of your journals that relate to Ghislaine Maxwell?

A. That's correct.

Testimony of Annie Farmer – Cross Examination

Q. And that's true if you had other journals from your senior year; no mention of Ghislaine Maxwell, right?

A. Correct.

Testimony of Annie Farmer – Cross Examination

Q. You said it was not weird, it was normal and fine, in your journal entry, right?

A. Yeah. I also said it weirded me out.

Q. And then you said, It's not a big deal. Right?

A. I did say that.

Q. And "I really don't think it is a big deal." Right?

A. Correct.

Q. So you used both versions: It's weird, it's not weird. Right?

A. Yes.

Testimony of Annie Farmer – Cross Examination

Q. And your memories today are colored by hindsight; correct?

A. Of course.

Q. And you are colored in your memories of hindsight by what happened to you in New Mexico, for example?

Q. Right?

A. Does that affect how I perceive what happened to me in New York?

Q. Yes.

A. Yes, I'm sure it does in some ways.

Testimony of Annie Farmer – Cross Examination

Q. And you have very little memory of how the New Mexico trip was planned; correct?

A. That's correct.

Q. And you have very little memory because you have no journal entries from that time period, right?

A. I have not had a journal to help me refresh my memories of how that was planned.

Testimony of Annie Farmer – Cross Examination

Q. ..what you told the FBI in November of 2006 is that originally Maria was going to accompany Annie to New Mexico; correct?

A. I see it says that.

Q. And that's what you told the FBI in November of 2006; correct?

A. I don't recall that, but I see that that's written here.

Testimony of Annie Farmer – Cross Examination

Q. You have no personal knowledge that Ghislaine made any of your travel plans; correct?

A. I do not.

Q. And you have no personal knowledge that she encouraged you to travel to New Mexico; right?

A. I do not.

Testimony of Annie Farmer – Direct Examination

Q. And you did not talk to Ms. Maxwell ever before you arrived in New Mexico; correct?

A. Correct.

Testimony of Annie Farmer – Cross Examination

Q. You don't actually know that Ghislaine Maxwell saw Epstein holding your hand; correct?

A. I don't.

Q. You just said she was present on the other side of him?

A. That's right.

Testimony of Annie Farmer – Cross Examination

Q. You testified on direct that Ghislaine massaged your chest and upper breast; correct?

A. That's correct.

Q. In the area of your pectoral muscles; correct?

A. Yeah, I guess that's all part of the breast, right?

Q. Ghislaine did not touch your nipples?

A. She did not touch my nipples.

Q. She did not touch your nipple area, right?

A. Right.

Testimony of Annie Farmer – Direct Examination

- Q. And what you told the agents and the government in May of 2020 is that the body massage was awkward and uncomfortable, but not explicitly sexual; correct?
- A. I don't believe those are my words; I think that's what's noted here. It says no touching of nipples, genitals, etc., and I did clarify that, but that did not happen.

Testimony of Annie Farmer – Cross Examination

Q. That you have no memory of him seeing you, right?

A. That's correct.

Q. He was not in the room for this massage, right?

A. That's right.

Testimony of Annie Farmer – Cross Examination

Q. Ghislaine Maxwell did not enter your room?

A. She did not.

Q. She was not in there the whole time this happened, right?

A. She was not in there.

Testimony of Annie Farmer – Cross Examination

Q. ...So what you told the victims compensation fund is that you were sexually abused in a movie theater in New York, right?

A. Right.

Q. And you were sexually abused in a movie theater in New Mexico?

A. Right.

Q. And both of those were related to the hand-holding incidents that happened in those two locations, right?

A. Yeah, that was explained in the application.

Q. Hand-holding was sexual abuse?

A. My experience was detailed in the application, which included, yes, him holding and caressing my hands. I did not say anything else happened to me in the movie theater.

Testimony of Annie Farmer – Cross Examination

Q. What you told the victims compensation fund is that your breasts were groped; correct?

A. Yes. I don't see that as significantly different, but --

Q. Rubbed, groped, massaged.

A. Yes.

Q. Not your nipple area, any of that?

A. No, she did not touch my nipples.

Q. But you told them your breasts were groped, right?

A. Yes.

Testimony of Annie Farmer – Cross Examination

Q. And you believed that that -- you told the victims compensation fund that that was also sexual abuse; correct?

A. Yes.

Testimony of Annie Farmer – Cross Examination

Q. And what you told the Epstein Victims Compensation Fund is that he rubbed his genitals against you in the bed; correct?

A. Yes.

Testimony of Annie Farmer – Cross Examination

Q. Originally, your sister Maria was going to accompany you on this trip to New Mexico; correct?

A. I don't remember that.

Testimony of Annie Farmer – Cross Examination

Q. And so on page 2 of that document, in the second full paragraph, the last sentence of that paragraph, what you told the FBI in November of 2006 is that originally Maria was going to accompany Annie to New Mexico; correct?

A. I see it says that.

Q. And that's what you told the FBI in November of 2006; correct?

A. I don't recall that, but I see that that's written here.

Testimony of Annie Farmer – Redirect

A. That Epstein or Maxwell was the one that was responsible for canceling Maria's trip at the last minute.

Q. And approximately how long were you in New Mexico

A. It was a weekend trip.

12.10.2021 Trial Tr. at 2075:19-20 (Annie Farmer)

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					1	2
29 MAR	"	"	VNY	SAF		938	[REDACTED]	1	5	
8 APR	"	"	PBI	TEB		921	[REDACTED]	2	1	
22 APR	"	"					[REDACTED]			
26	"	"					[REDACTED]			
29	"	"					[REDACTED]			
3	"	"					[REDACTED]			
3	"	"					[REDACTED]			
6	"	"					[REDACTED]			
6	"	"					[REDACTED]			
8	"	"	TEB	MDLR		837	[REDACTED]	1	3	3
9	"	"	MDLR	MBGT		838	[REDACTED]	1	7	
9	"	"	MBGT	PBI		839	[REDACTED]	1	5	
13	"	"	PBI	CMB		840	[REDACTED]	1	2	1
13	"	"	CMB	TEB		841	[REDACTED]	1	1	
17	"	"	TEB	PBI		842	[REDACTED]	2	1	
20	"	"	PBI	TEB		843	[REDACTED]	2	2	
22	"	"	TEB	SAF		844	[REDACTED]	4	0	
24	"	"	SAF	PBI		845	[REDACTED]	3	1	
27	"	"	PBI	TEB		846	[REDACTED]	2	3	

April 29, 1996
Flight Log



No Weekend Trips To Santa Fe
In April And May 1996

GX-662

Q. And approximately how long were you in New Mexico

A. It was a weekend trip.

12.10.2021 Trial Tr. at 2075:19-20 (Annie Farmer)

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	
29 MAR	"	"	VNY	SAF		938			1	5
8 APR	"	"	PBI	TGB		921			2	1
22 APR										
26										
29 MAY										
3										
3										
6										
6										
8	"	"	TGB	MDLR		837		1/1	3	3
9	"	"	MDLR	MBGT		838		1/1		7
9	"	"	MBGT	PBI		839		1/1		1
13	"	"	PBI	CMB		840		1/1		2
13	"	"	CMB	PEB		841				1
17	"	"	TGB	PBI		842				2
20	"	"	PBI	TGB		843		1/1		2
22	"	"	TGB	SAF		844		1/1		4
24	"	"	SAF	PBI		845		1/1		3
27	"	"	PBI	TGB		846				2

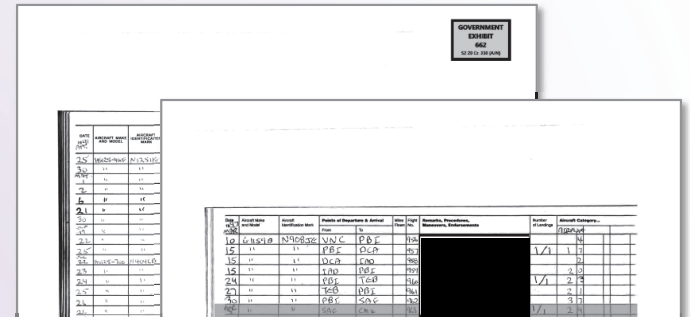
April 29, 1996
Flight Log

No Weekend Trips To Santa Fe
In April And May 1996

GX-662

APR 1997

April 2, 1997
Flight Log



Farmer was 17, almost 18, in 1997

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					1	2
MAR 30	"	"	PBE	SAF		962		3	7	
APR 2	"	"	SAF	CMH		963		1/1	2	4

GX-662

December 14, 2021
U.S. Customs Person Encounter List

U.S. Customs and Border Protection
U.S. Department of Homeland Security
TECS - Person Encounter List

12/14/2021 13:52 EST
Generated By: MICHAEL AZNARAN
Page 2 of 3

Last Name	First Name	DOB	Doc Type	Document Number	Date - Time (Eastern)	Carrier Code	Carrier Num.	I/O	Site	Type	Status	Updated Status	Arr Loc	Dep Loc
FARMER	ANNIE				07/20/1997 00:00	CO	37	I	4601	APIS			EWR	DUS

Codes	Value
	Legend
	Loc
	BOOSTON - INTERCONTINENTAL
	MEXICO CITY - JIMAREZ INTERNATIONAL
	SANJOSE - SAN JOSE
	SANJOSE - SAN JOSE
	SEASIDE - INTERNATIONAL
	CAPTAIN CARLOS PEREZ
	PHILADELPHIA
	Doc Type
	P - PASSPORT
	Site Code
	A514 - CBP-PHOENIX, RPT HARBOR INTL
	A534 - CBP-BOOSTON, ROSS INTL AIRPORT
	4601 - 4601
	1108 - 1108

For Official Use Only - Law Enforcement Sensitive

9

Value

DUSSELDORF

Q. In that summer when Annie was in Thailand, you were in Germany; correct?

A. Yes, I was.

A. DUS . . . is Düsseldorf, Germany.

12.10.2021 Trial Tr. at 2263:7-9 (Annie Farmer)

12.16.2021 Trial Tr. at 2517:9 (Aznanan)

MA-1

Testimony of Annie Farmer – Cross Examination

Q. And you wore them a lot?

A. I mean, because that's the general term. I didn't wear them to work or things, but I did wear them when I would go two-stepping.

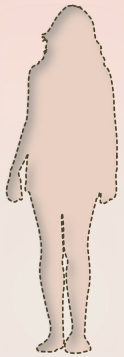
Q. So you went dancing in the boots that Mr. Epstein bought for you?

A. That's correct.

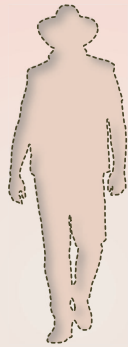
Q. To the point where the heels are worn down and the toes are scuffed; right?

A. Yes.

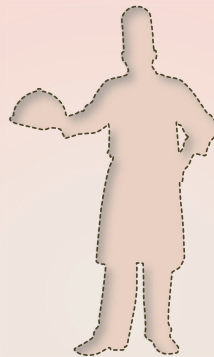
Where Were The Witnesses?



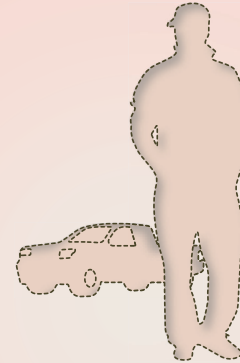
Farmer's sister



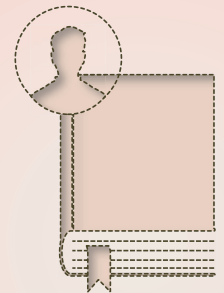
Employees at
the ranch
(ranch hand)



Employees at
the ranch
(chef)

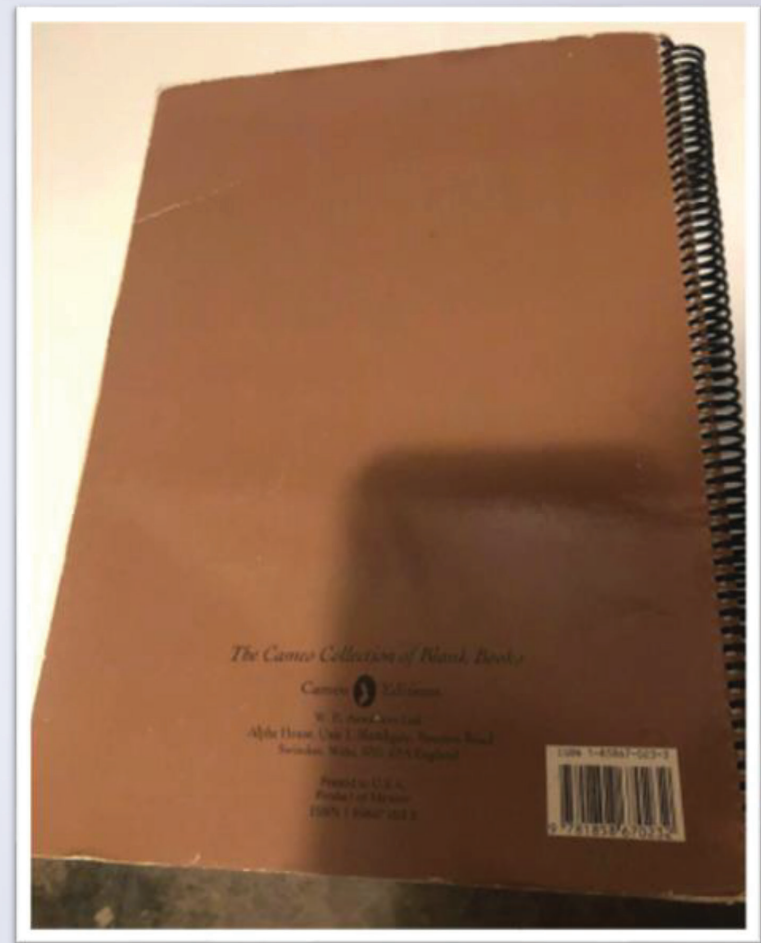
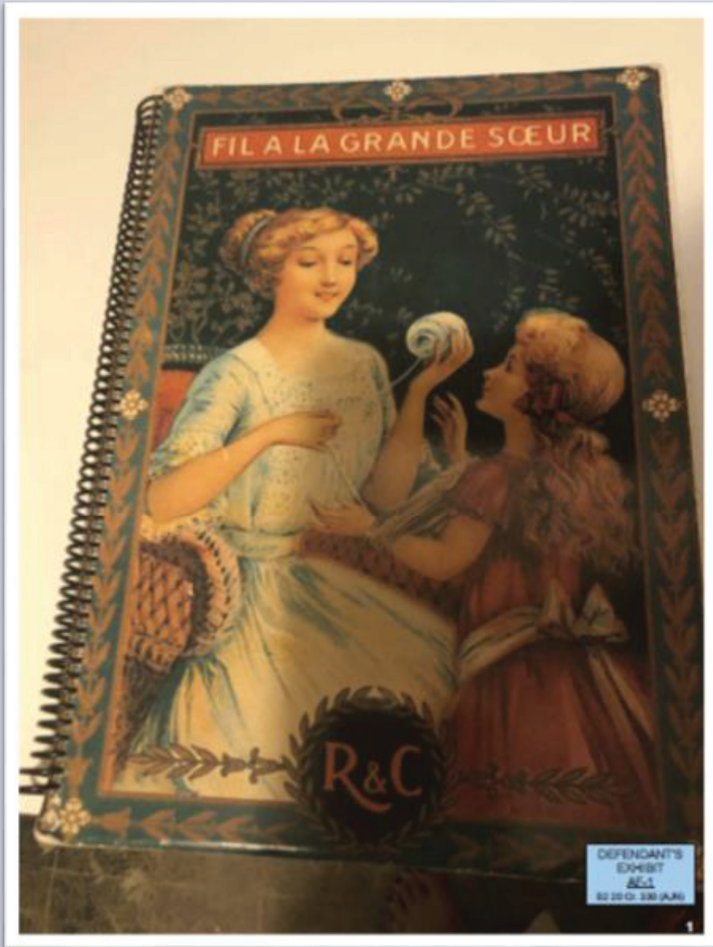


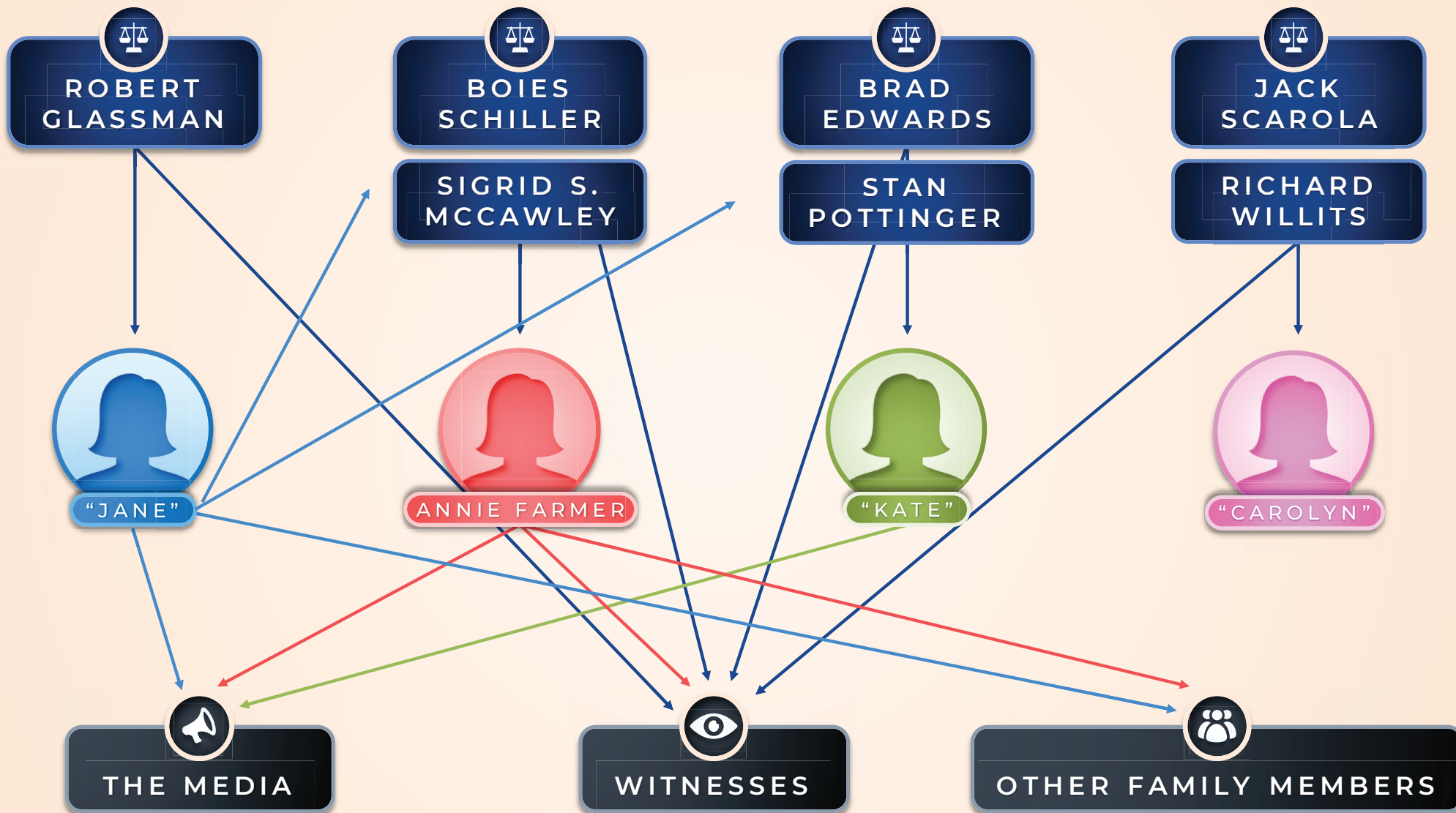
Employees at
the ranch
(driver)



Friend listed in
her diary

Missing Journal





Money Changed Farmer's Story To A Sexualized Story

Tells FBI, "not sexualized"

Q. What you told the government on that occasion is you do not remember it, meaning the foot massage, being sexualized; correct?

A. I see that that is the note, that that's how it was described. I would say, just as what I said a minute ago, is

12.10.2021 Trial Tr. at 2176:23-2 (Annie Farmer)

Q. And what you told the agents and the government in May of 2020 is that the body massage was awkward and uncomfortable, but not explicitly sexual; correct?

A. I don't believe those are my words; I think that's what's noted here. It says no touching of nipples, genitals, etc., and I did clarify that, but that did not happen

12.10.2021 Trial Tr. at 2183:10-16 (Annie Farmer)

Money Changed Farmer's Story To A Sexualized Story

Tells FBI, "**not sexualized**'

JUN 25

Epstein comp fund
opens up

JUN 26

Annie submits claim where everything is "sexualized," including "sexual abuse in movie theater"

2006



2020

Farmer Received \$1.5 Million For Her Story About “Sexual Abuse In A Movie Theater”

Epstein Victims' Compensation Program (EVCP)



Claimant, for and on behalf of herself and her heirs, devisees, legatees, distributees, executors, administrators, trustees, personal representatives, successors and assigns (collectively, “Releasor”), for and in consideration of **One Million Five Hundred Thousand Dollars (\$ 1,500,000.00)** (the Compensation Offer) to be received from the EVCP, the adequacy and sufficiency of which are hereby acknowledged, hereby releases and forever discharges the Co-Executors of the Estate of Jeffrey E. Epstein (the “Epstein Estate”), the Co-Trustees of The 1953 Trust, the Epstein Estate, any entities owned or controlled in whole or part by the Epstein Estate (the “Epstein Entities”) and their respective current

adequacy and sufficiency of which are hereby acknowledged, hereby releases and forever discharges the Co-Executors of the Estate of Jeffrey E. Epstein (the “Epstein Estate”), the Co-Trustees of The 1953 Trust, the Epstein Estate, any entities owned or controlled in whole or part by the Epstein Estate (the “Epstein Entities”) and their respective current

Kate

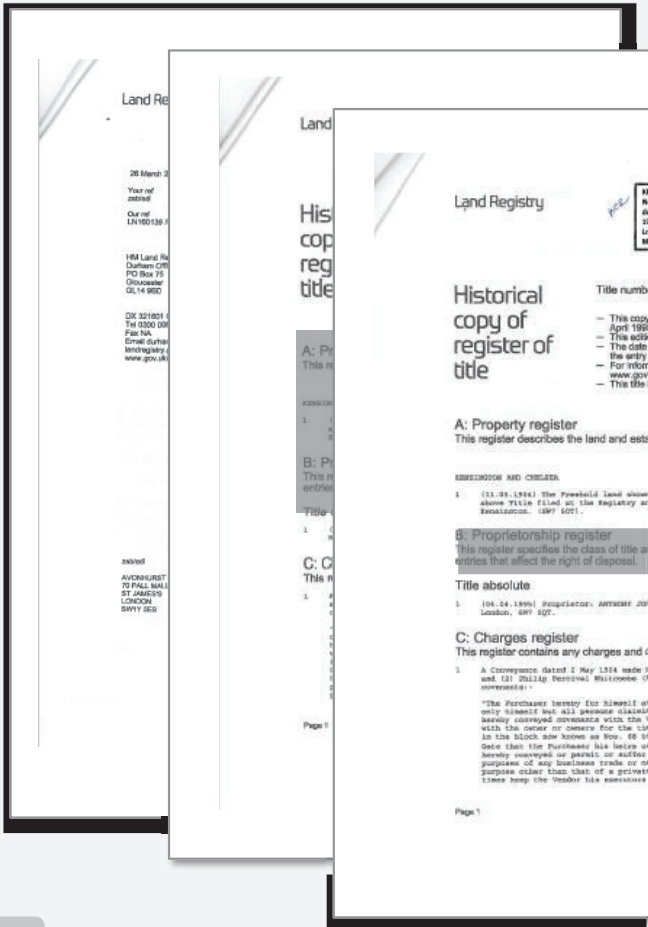
Instruction From The Court

The Court: I instruct you that because the witness was over the relevant age of consent at the relevant time period, any sexual conduct she says occurred with Mr. Epstein was not, quote, illegal sexual activity, end quote, as the government has charged in the indictment. For that reason, I have directed the government not to ask this witness about the details of any sexual conduct she says occurred with Mr. Epstein.

I instruct you that this witness is not a victim of the crimes charged in the indictment. To the extent you conclude her testimony is relevant to the issues before you, you may consider it. However, you may not convict the defendant on the basis of the testimony regarding the sexual conduct between this witness and Mr. Epstein, nor may you consider this testimony as any kind of reflection on Mr. Epstein's nor Ms. Maxwell's character or propensity to commit any crimes charged in the indictment.

Purchases of 69 Stanhope Mews East, London

December 13, 2021
Land Registry



KENSINGTON AND CHELSEA

- (11.05.1904) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being 69 Stanhope Mews East, Kensington.

B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- (11.11.1988) Proprietor: GHISLAINE NOELLE MARION MAXWELL of 69 Stanhope Mews East, Kensington, London, SW7 5QT.

B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- (04.04.1995) Proprietor: ANTHONY JOHN JEFFS of 69 Stanhope Mews East, London, SW7 5QT.

Purchases of 44 Kennerton Street, London

December 13, 2021
Land Registry

Land Registry

13 December 2021

Your ref
zab3389

Our ref
NGL343852/OC

HM Land Registry
Durham Office
PO Box 75
Gloucester
GL14 9BD

DX 321601 Gloucester
Tel 0300 006 000
Fax NA
Email durham.off@landregistry.gov.uk
www.gov.uk/land

Land Registry

Historical copy of register of title

A: Property register
This register describes the land mentioned below, the title includes lease but is subject to any rights which exist and benefit or affect

CITY OF WESTMINSTER

1 (10.01.1979) The Leasehold above Title filed at the le

2 Short particulars of the lease held:
DATE : 22 December 1979
TERM : 604 years from 22 December 1979
RENT : £100
PARTIES : 1. The Honourable Courtenay Jane
2. Bryan Alan J

3 There are excepted from the interests, powers and remedies made in breach of the prohibitions contained in the

zab3389

NEXA LAW LIMITED
OFFICE 1
THE CHURCH OF SALOP ROAD
OSWESTRY
SHROPSHIRE
SY11 2NR

Page 1

Land Registry

Historical copy of register of title

A: Property register
This register describes the land mentioned below, the title includes lease but is subject to any rights which exist and benefit or affect

CITY OF WESTMINSTER

1 (10.01.1979) The Leasehold above Title filed at the le

2 Short particulars of the lease held:
DATE : 22 December 1979
TERM : 604 years from 22 December 1979
RENT : £100
PARTIES : 1. The Honourable Courtenay Jane
2. Bryan Alan J

3 There are excepted from the interests, powers and remedies made in breach of the prohibitions contained in the

B: Proprietorship register
This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (10.03.1997) Proprietor: GHSILAINE NOELLE MARION MAXWELL care of M.C. Grumbridge, The Hogarth Group, Airedale Avenue, London W4 2NW.

Page 1

CITY OF WESTMINSTER

1 (10.01.1979) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being 44 Kinnerton Street.

B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (20.03.1997) Proprietor: GHSILAINE NOELLE MARION MAXWELL care of M.C. Grumbridge, The Hogarth Group, Airedale Avenue, London W4 2NW.

B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (30.06.1986) Proprietor: JOHN GERARD O'NEILL and NESSA O'NEILL his wife, both of Stratton Audley Hall, Stratton Audley, Oxfordshire.

CAROLYN

Carolyn Only identified Epstein and Kellen As Involved In Her Claim

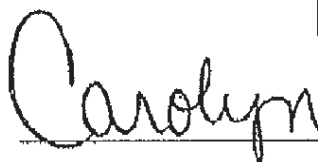
February 17, 2009

20. State the names, addresses and phone numbers of all males, excluding your claims against Mr. Epstein, whom you have claimed (formally or informally) committed lewd or lascivious conduct to you since age 10 (by year) up through your current age. Describe the lewd or lascivious conduct, the date and whether you received money or other consideration from the person.

ANSWER

None

Plaintiff's Answers to Defendant's First Interrogatories

A handwritten signature in cursive script that reads "Carolyn". The signature is written in black ink on a white background.

Signature of Answering Party



Carolyn Only identified Epstein and Kellen As Involved In Her Claim

October 26, 2009

Plaintiff

16. State in detail how you came to be at Mr. Epstein's home on each occasion, i.e. did someone bring you or ask you if you would or wanted to go; if so, state the name and address of that individual and what he/she told you and the purpose of your visit.

ANSWER

I was introduced to Jeffrey Epstein by my friend Virginia in 2002. I was to give Jeffrey Epstein a massage. I continued to provide massages up until August of 2003. I was transported to Jeffrey Epstein's house by Yellow Cab, provided by Jeffrey Epstein, Virginia, my ex- boyfriend Shawn [REDACTED], my mother Dorothy [REDACTED] and my brother [REDACTED]. I was also transported via private car provided by Jeffrey Epstein.

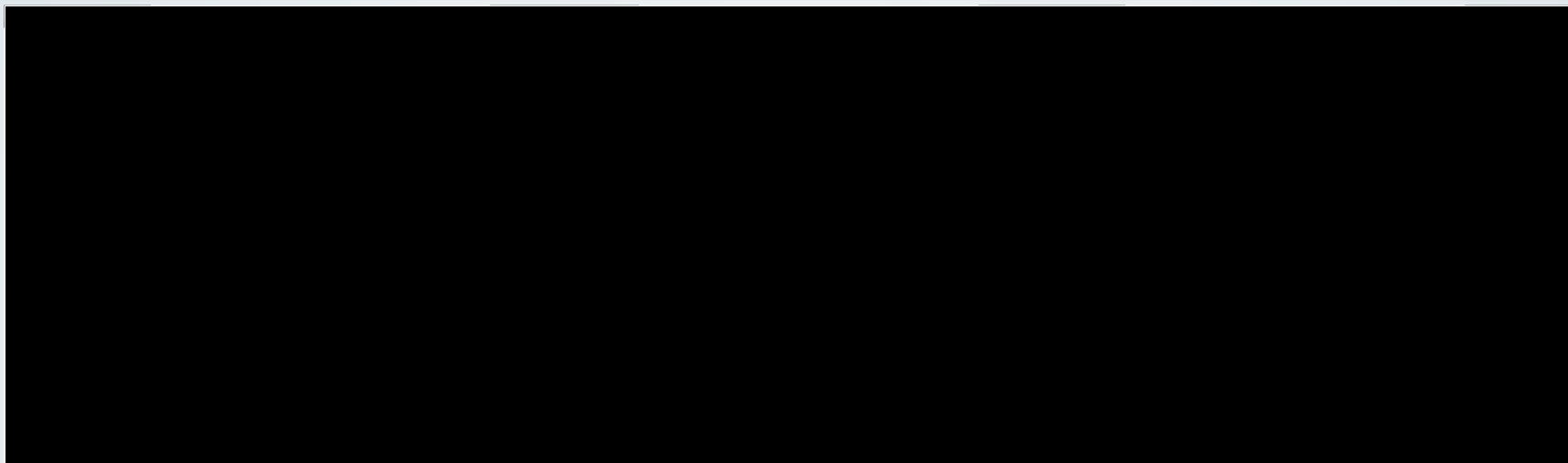
Virginia
(Address will be provided upon receipt)

Carolyn [REDACTED] being duly sworn, deposes and says that the foregoing answers to interrogatories are true and correct to the best of her knowledge, information and belief.

Carolyn
Carolyn [REDACTED]

SUBJECT TO PROTECTI

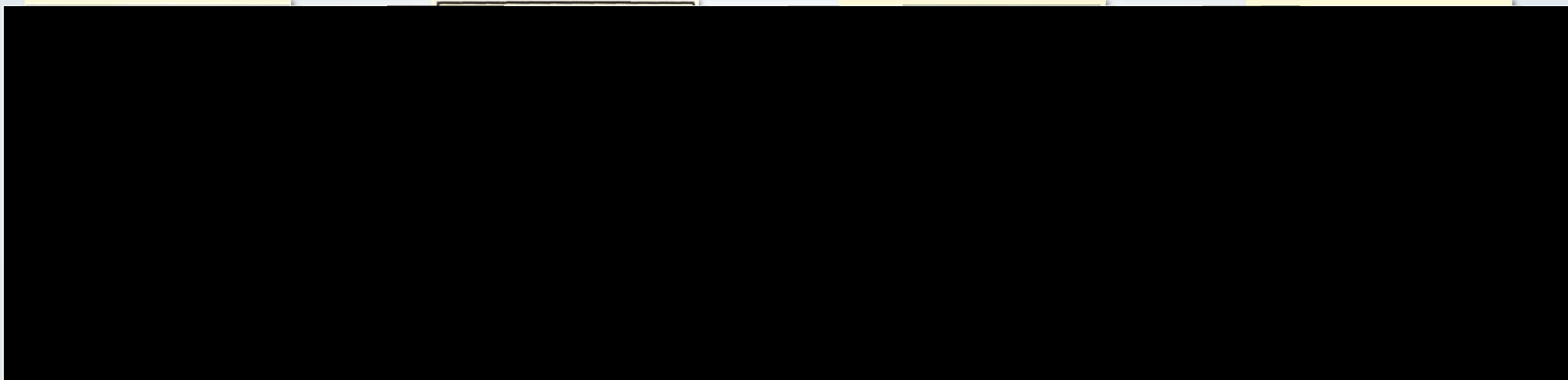
Message Pads Show Carolyn Calling For Epstein



SIGNED GX-2-U

SIGNED GX-2-P

SIGNED GX-2-T



SIGNED GX-2-O

SIGNED GX-2-M

SIGNED GX-2-D

SIGNED GX-1-B

GHISLAINE NEVER PREGNANT

Testimony of Carolyn – Cross Examination

Q. One of your memories about Ms. Maxwell is you claim that you saw a photograph of her in Epstein's house, pregnant; correct?

A. Nude and pregnant laying on the --

Q. And pregnant.

A. -- yes. There was multiple pictures, nude photos.

Testimony of Cimberly Espinosa– Direct Examination

Q. Okay. Question about Ghislaine. In the time that you worked for Ghislaine Maxwell from 1996 to 2002, did you ever see Ms. Maxwell pregnant?

A. No.

Q. Ever were told that Ms. Maxwell was pregnant?

A. No.

Testimony of Shawn – Direct Examination

Q. Did you and Carolyn ever talk about Maxwell?

A. No.

Testimony of Shawn – Cross Examination

Q. And you and Carolyn were using marijuana, cocaine, ecstasy, and other pills during that time period; correct?

A. Correct.

Testimony of Shawn – Cross Examination

Q. And you would occasionally answer the phone and it would either be Epstein or Sarah Kellen calling; correct?

A. Yes.

Testimony of Shawn – Direct Examination

Q. And you knew the name Sarah because Sarah told you that she was calling on behalf of Epstein; correct?

A. Yes.

Testimony of Shawn – Cross Examination

Q. And in that meeting, the phone meeting, you identified two people that called you, Sarah and then another European woman with an accent that wasn't British that you couldn't identify; correct?

A. Correct.

Testimony of Juan Patricio Alessi – Cross Examination

Q. And he would tell you before he got there to remove any of the pictures of Ms. Maxwell in the house; correct?

A. Yes, he did sometimes.

PROFESSOR LOFTUS



**PROF. ELIZABETH
LOFTUS**

*Human Memory
Professor And
Scientist*



Distinguished Professor at the *University of California-Irvine*
(2002-present)



Professor at the *University of Washington in Seattle*



Faculty at the graduate faculty at *the New School for Social Research*



EDUCATION:

- **B.A.**, with Highest Honors in Mathematics and Psychology, *UCLA, 1966*
- **M.A.**, Psychology, *Stanford University, 1967*
- **Ph.D.**, Psychology, *Stanford University, 1970*



AWARDS:

- **Elected** to the *United States National Academy of Sciences (2004)*
- **Numerous awards** including lifetime awards from the *American Psychological Association*
- **Honorary degrees:** *John Jay College of Criminal Justice, University of Oslo, Haifa University, and many others*

Memory
weakens over time

Memory
is malleable



Memory impacted and
corrupted by
post-event
contamination

INTERVIEWS



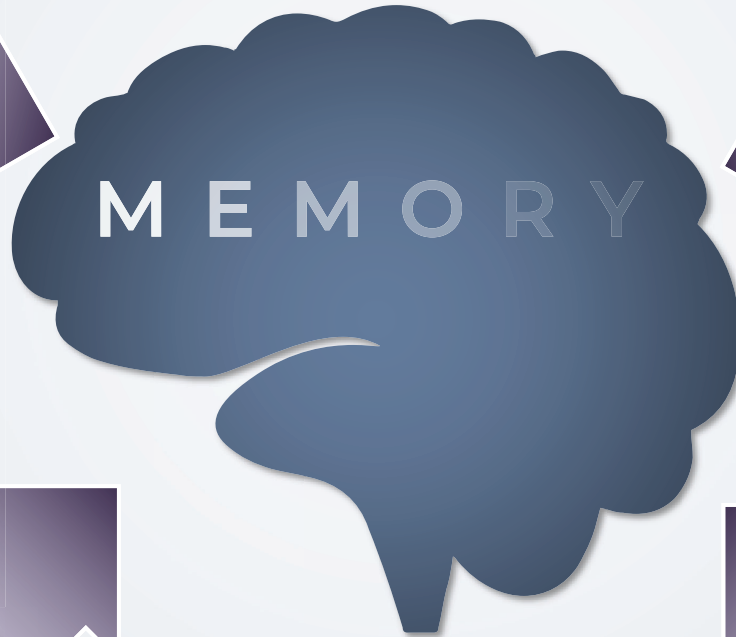
MEDIA



LAWYERS



MEMORY



CONVERSATIONS



LOTS OF
MONEY



Testimony of Elizabeth Loftus – Direct Examination

A. One of the things we know about memory is it **doesn't work like a recording device**. You don't just record the event and play it back later. The process is much more complex. And we study the processes of memory, tend to divide that process into **three major stages**.

Testimony of Elizabeth Loftus – Direct Examination

A. But sometimes what happens with individuals is they draw inferences about what might have happened or what could have happened or what possibly happened and they can suggest things to themselves. That's called autosuggestion where there is not somebody deliberately suggesting something to you, not deliberately trying to tell you, you know, I saw the thief and he was wearing a brown jacket instead of a green jacket, but you, the witness, are drawing inferences that then start to feel as if they're memories.

Testimony of Elizabeth Loftus – Direct Examination

- A. I mean, the event is getting older and older, and some other things are important in this retention stage, and one of those things is whether or not a person is exposed to post-event suggestion. If there is post-event suggestion, maybe a little misinformation, it can enter a witness's memory and cause a contamination, an alteration, a distortion, or even a supplementation of memory, and the longer that retention interval, the older -- the older the event is, the more susceptible people are to having post-event suggestion potentially contaminate their memory.

Testimony of Elizabeth Loftus – Direct Examination

Q. Well, in addition to questioning someone, are there other situations in which there can be the exchange of information that can be suggestive to an individual?

A. Yes.

Q. Can you please give us some examples of that.

A. Sometimes when people are trying to retrieve information, there is pressure to provide more, more details, more details about some particular subject. I've seen that not only in law enforcement interviews, but more often even in certain kinds of psychotherapy.

Testimony of Elizabeth Loftus – Direct Examination

Q. Memory has been termed a constructive process; correct?

A. Yes.

Q. Could you explain what that means to the jury.

A. What we mean by that is, as I testified earlier, we don't just record events and play it back later like a recording device would work, like a video machine, but rather, we are actually constructing our memories when we retrieve memories. We often take bits and pieces of experience sometimes that occurred at different times and places, bring it together, and construct what feels like a recollection.

The Charges

~~COUNT 1~~
Enticement Conspiracy

~~JANE, ANNIE, KATIE, and CAROLYN~~

~~COUNT 2~~
Enticement

~~JANE ONLY~~

~~COUNT 3~~
Transportation with Intent Conspiracy

~~JANE, ANNIE, KATIE, and CAROLYN~~

~~COUNT 4~~
Transportation with Intent

~~JANE ONLY~~

~~COUNT 5~~
Sex Trafficking Conspiracy

CAROLYN and ~~unnamed others~~
(Mere presence is not enough)

~~COUNT 6~~
Sex Trafficking

CAROLYN and ~~unnamed others~~

PRESUMPTION OF INNOCENCE

1 **Instruction No. 7: Presumption of Innocence and Burden of Proof**

2 The law presumes the defendant to be innocent of all charges against her. Ms. Maxwell
3 has pleaded not guilty to the charges in the Indictment. As a result, the burden is on the
4 Government to prove Ms. Maxwell's guilt beyond a reasonable doubt as to each charge. This
5 burden never shifts to the Defendant for the simple reason that the law never imposes upon a
6 defendant in a criminal case the burden or duty of testifying, or calling any witness, or locating
7 or producing any evidence. In other words, Ms. Maxwell does not have to prove her innocence.

8 This presumption of innocence was with Ms. Maxwell when the trial began and remains
9 with Ms. Maxwell unless and until you are convinced that the Government has proven her guilt
10 beyond a reasonable doubt as to each charge. Even though Ms. Maxwell has presented evidence
11 in her defense, the presumption of innocence remains with her and it is not her burden to prove
12 that she is innocent. It is always the Government's burden to prove each of the elements of the
13 crimes charged beyond a reasonable doubt.

REASONABLE DOUBT

Instruction No. 8: Reasonable Doubt

1
2 The question that naturally arises is: “What is a reasonable doubt?” What does that
3 phrase mean? The words almost define themselves. A reasonable doubt is a doubt based in
4 reason and arising out of the evidence in the case, or the lack of evidence. It is a doubt that a
5 reasonable person has after carefully weighing all of the evidence in the case.

6 Reasonable doubt is a doubt that appeals to your reason, your judgment, your experience,
7 and your common sense. Reasonable doubt is not whim or speculation. It is not an excuse to
8 avoid an unpleasant duty. Nor is it sympathy for the Defendant. The law in a criminal case is
9 that it is sufficient if the guilt of the Defendant is established beyond a reasonable doubt, not
10 beyond all possible doubt. Therefore, if, after a fair and impartial consideration of all the
11 evidence, you can candidly and honestly say that you do have an abiding belief of Ms.
12 Maxwell’s guilt as to any crime charged in this case, such a belief as a prudent person would be
13 willing to act upon in important matters in the personal affairs of his or her own life, then you
14 have no reasonable doubt, and under such circumstances it is your duty to convict Ms. Maxwell
15 of the particular crime in question.

16 On the other hand, if after a fair and impartial consideration of all the evidence, you can
17 candidly and honestly say that you are not satisfied with Ms. Maxwell’s guilt as to any charge,
18 that you do not have an abiding belief of her guilt as to that charge—in other words, if you have
19 such a doubt as would reasonably cause a prudent person to hesitate in acting in matters of
20 importance in his or her own affairs—then you have a reasonable doubt, and in that circumstance
21 it is your duty to acquit Ms. Maxwell of that charge.

**NOT GUILTY
ON ALL COUNTS**

