

EXHIBIT 264

DENISE GEORGE Confidential
GOVT OF US VI V. JPMORGAN CHASE

July 17, 2023

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CONFIDENTIAL
UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK
CASE NUMBER: 22-CV-10904-JSR
ACTION FOR DAMAGES

GOVERNMENT OF THE UNITED STATES)
VIRGIN ISLANDS,)
)
Plaintiff,)
)
VS.)
)
JP MORGAN CHASE BANK, N.A.,)
)
Defendant.)
)

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VIDEO RECORDED DEPOSITION OF
DENISE GEORGE
MONDAY, JULY 17, 2023

REPORTED BY:

DENISE D. HARPER-FORDE
Certified Shorthand Reporter (CSR)
Certified RealTime Reporter (CRR)
Certified LiveNote Reporter (CLR)
Registered Professional Reporter (RPR)
Notary Public (FLORIDA)

1 The time is 2:37.

2 (BY ATTORNEY O'LAUGHLIN):

3 Q. So, Ms. George, I understand
4 you had a discussion with your counsel
5 while we were off the record about a
6 question I asked you earlier today,
7 correct?

8 A. Yes.

9 Q. And the question that I'd
10 asked you earlier today was about your
11 personal E-mails and references to
12 Jeffrey Epstein in those E-mails,
13 correct?

14 A. Yes.

15 Q. And you had earlier refused to
16 answer that question, correct?

17 A. Yes.

18 Q. And you now want to now revise
19 that answer, correct?

20 A. Yes.

21 Q. Okay. What is the answer?

22 A. That there are E-mails,
23 information within my personal E-mail
24 that is directly related to
25 information from my DoJ E-mail that I

1 was working on while I was Attorney
2 General and sent to -- by myself to my
3 personal E-mail to work on.

4 Q. Okay. So you would have
5 forwarded E-mail from your work as
6 Attorney General to your personal
7 account?

8 A. Yes.

9 Q. Okay. Setting aside those
10 E-mail -- E-mails, are there any other
11 E-mails regarding Jeffrey Epstein in
12 your personal E-mail that you're aware
13 of?

14 A. Not I'm aware of.

15 Q. Okay. And you have no reason
16 --

17 A. I don't recall.

18 Q. -- to think there would be?

19 A. Yeah. I don't recall anything
20 else. I don't recall that, no.

21 ATTORNEY ACKERMAN: Okay. And
22 just to be -- to be clear,
23 counsel, the witness has concerns
24 about descriptions of her personal
25 E-mail.

1 He just brought it to my
2 attention that this is what
3 Jeffrey Epstein wants, and -- and
4 I can expect a call from his
5 attorney.

6 (BY ATTORNEY O'LAUGHLIN) :

7 Q. And did Governor Bryan
8 express a position one way or the
9 other, or he was just asking for you
10 to make your decision?

11 A. He expressed his position but
12 he -- but he asked me to make a
13 decision --

14 Q. What was the --

15 A. -- but didn't tell me what the
16 decision was.

17 ATTORNEY ACKERMAN: So this is
18 where the specifics of the
19 conversation between Governor
20 Bryan and Attorney General are
21 governed by executive privilege
22 and by deliberative process, given
23 the manner that Attorney General
24 just mentioned that she was making
25 a decision.

1 the record without any question
2 for the reasons that I stated
3 regarding the objections to the
4 document.

5 THE WITNESS: Oh. Did you ask
6 if you read it correctly? Yeah,
7 you did. Yes, you did.

8 (BY ATTORNEY O'LAUGHLIN):

9 Q. Okay. Do you recall ever
10 being confronted with these types of
11 concerns while you were Attorney
12 General?

13 ATTORNEY ACKERMAN: Object to
14 form, vague.

15 THE WITNESS: Confronted with
16 those concerns? By the time I
17 became Attorney General, I was --
18 I was very concerned about the
19 situation.

20 When I came onboard, at that
21 point in time, there were just --
22 all of this, you know, information
23 were swirling around the media
24 with respect to what had been
25 going on on -- on pedo- -- what

1 they called Pedophile Island,
2 unfortunately, on the Little St.
3 James.

4 That the horrendous things
5 that had been happening, the --
6 the sex trafficking and all of
7 that, it was just mind-boggling to
8 me not -- not to mention
9 horrific.

10 I -- and so I don't even know
11 if anybody had come to me for it.
12 It was just so outrageous. This
13 is -- the Virgin Islands is my
14 home. And it was mind-boggling to
15 me how -- if this is all true, how
16 that could have been gone on --
17 going on for years, and nothing
18 and no one is doing anything.

19 So to tell you the truth, I
20 mean, I can't -- there was a lot
21 of media stuff and all of that. I
22 -- you know, I inquired to see if
23 there were any complaints that
24 came in. Like how could this be?

25 So I inquired to VIPD. I

1 inquired our office to find out
2 what, if any, complaints or
3 anything came in to the office, or
4 maybe even pending, that all this
5 could possibly be going on and --
6 and could possibly have been going
7 on and nothing has -- I don't --
8 you know.

9 So for me, I'm looking at
10 this. I am seeing how outraged.
11 I can't -- I had the same or even
12 worse, but I can't say like saying
13 that everybody knew. I don't know
14 that. I know she stated that.

15 And -- and I know Ms. Lewis
16 very well, and she's quite an
17 advocate that I work together
18 with. But I clearly see her
19 outrage. That's what I'm seeing
20 there.

21 What I saw and what I came and
22 what I heard, what was going
23 around, what was swirling around.
24 Oh, definitely. I was very much
25 aware of that, but it -- it just

1 was -- it was horrendous and
2 baffling and mind-boggling.

3 (BY ATTORNEY O'LAUGHLIN):

4 Q. Did Ms. Lewis reach out to you
5 personally?

6 A. Read out to me particularly
7 this matter?

8 Q. Yeah, about Epstein.

9 A. No. I have met with Ms. Lewis
10 because we had joined together to work
11 on -- you know, together on several
12 things with the resource center
13 regarding the sex trafficking in
14 general and the prevention and getting
15 some -- you know, finding out and
16 informing the public as far as what is
17 -- what it is and what is going on.

18 So she was very instrumental
19 in that in the public relations aspect
20 as well as being able to get out to
21 the victims, possible victims of
22 sexual assault. Not only sex
23 trafficking, but I did do a show with
24 her on sex trafficking alone.

25 But -- but on, you know,

1 getting victims some kind of, you
2 know, kind of help. What people can
3 do. What people can do if they see
4 signs of sex trafficking and that sort
5 of thing so that we don't -- this
6 doesn't happen again.

7 I don't know how it happened.
8 I don't know. But since I'm here now,
9 as far as I'm concerned, April of 2019
10 they said it happened. Well, I want
11 to find out what happened because
12 something went on that this thing went
13 by for so many years. It was
14 mind-boggling. So I -- at that point
15 that's why I really wanted to do
16 something.

17 So you're referencing what was
18 said here. I clearly feel her outrage
19 and share it. She -- no, she did not
20 specifically come to me to talk to me
21 about this. I don't know, you know if
22 it did with the Attorney General's
23 Office previously. I don't know. I
24 don't know. I can't speak to what
25 happened before I got there. I could

1 just speak for what happened when I
2 got there.

3 Q. So when you got there and you
4 felt strongly that you wanted to do
5 something --

6 A. Uh-huh.

7 Q. -- what were the things you
8 did?

9 A. Well, what I did first -- and
10 keeping in mind that I first came, and
11 I have a complete department to run,
12 and there are crises going on in
13 various departments. It's -- the
14 department is critically understaffed,
15 and there were many things.

16 But what I did with respect to
17 that in hearing all these things is
18 first, as I indicated, I made a
19 general -- you know, just an inquiry
20 to find out do we have cases? Do we
21 have a record of anyone complaining or
22 any -- anyone complaining about seeing
23 something that looked suspicious on
24 Little St. James or -- or with respect
25 to Jeffrey Epstein in particular.

1 And I -- but mainly with law
2 enforcement. So I inquired with VIPD,
3 you know, to see if there's anything,
4 if they could look in their records
5 and the Department of Justice. I
6 didn't do that with the federal
7 authorities who were also there
8 because they're -- you know, they're
9 not going to disclose if there's a
10 pending investigation or anything like
11 that.

12 But I did not inquire with
13 them, but -- and I found that
14 the first -- that's the first thing
15 that I did and found that there was --
16 there was nothing. Everything I got
17 back was that they didn't have any
18 record of anything.

19 And so that's the first thing.
20 And at that point in time, also what
21 had been transpiring was not only the
22 sex offender, the request that was --
23 we were dealing with, but then I came
24 to understand or I had the -- just say
25 it was my understanding upon

1 information and belief and that the
2 federal authorities were investigating
3 Jeffrey Epstein also, but -- and then
4 later on there was the prosecution.

5 Q. So there was a lot in that
6 answer. So let's unpack it.

7 A. Yeah, but to be -- you asked
8 me what did I do --

9 Q. Sure.

10 A. -- after.

11 Q. So you reached out to DOJ and
12 the VIPD?

13 A. Yes, and I --

14 Q. That was one thing?

15 A. Yeah.

16 Q. And both of them came back and
17 reported that there was --

18 A. Right.

19 Q. -- what?

20 A. That they had seen -- in the
21 records, they had not seen any reports
22 of any complaints that came in. That
23 would be something that, you know, of
24 course complaints that came in
25 regarding sexual assault trafficking

1 or, you know, that sort of thing would
2 have been going on on the island.

3 Q. And then what did you do after
4 you found out it came back that there
5 were no complaints?

6 A. I just -- well, I guess
7 personally I didn't -- well, what I
8 did was at that point in time, I just
9 started to really read a lot of the --
10 of the reports, and it's -- it's news
11 media reports.

12 Which is fairly hearsay to
13 hear -- to just get the gist of what
14 is being said even though I know that
15 you can't -- I can't just rely on --
16 on news media. I can't do that.

17 You know, it's rumor,
18 innuendo. But to see where they're
19 getting this information from and
20 what's happening because it became
21 even more of a curiosity for me and
22 thinking this is something we -- we
23 got to do something about, you know.

24 I don't know what happened
25 then, but I can't sit here and hear

1 that all this happened, especially
2 when under our statutes, sexual
3 assaults and -- and child abuse are --
4 have no statute of limitations.

5 So it wouldn't have been too
6 late to do anything if we had solid
7 evidence, because I can't go by
8 innuendo. I can't go by rumor. I
9 can't go by media reports and say,
10 Okay, you know, let's, you know, do an
11 investigation.

12 And then I was also critically
13 short-staffed as well. I didn't have
14 the resources either. But it was
15 really where I was really
16 contemplating what can be done.

17 But once learning or
18 understanding that the federal
19 authorities were investigating
20 Mr. Epstein and prosecuting
21 criminally, and there was -- there
22 might have been a criminal
23 investigation going on.

24 That is something that I would
25 not do -- that it sort of preempts

1 going and doing something when once
2 the federal authorities or any other
3 authorities have started a criminal
4 investigation or that prosecutors.

5 They made the arrest. Then
6 that's sort of under, I think it's
7 called the First Forum Rule. It's --
8 it's like in respect to the other
9 forum, that you do not -- you know, we
10 won't go and, you know, start up a
11 prosecution when there's one already
12 there.

13 So it's been -- it pleased me
14 to see that something was being done
15 with law enforcement organization that
16 had the resources to be able to do it.
17 So once I learned that that was
18 happening. Okay, then at least
19 something is being done. There's a
20 prosecution.

21 And then I was very -- you
22 know, try to be in-tuned with what it
23 is and what the charges were once he
24 was arrested, and looking forward to
25 seeing Jeffrey Epstein brought to

1 justice. But also hearing more about
2 what happened and what part Little St.
3 James may have played in it.

4 Q. How did you learn that a
5 federal investigation was being
6 done?

7 A. I did not learn it for sure,
8 but I -- I don't recall exactly how --
9 there were certain questions that
10 might have been asked or something
11 that I -- I just sensed that there was
12 an investigation going on.

13 And I can't -- and it's not
14 something that I could -- would even
15 disclose, of course, even if I knew.
16 But I sensed that one was going on.

17 Q. Questions asked by who?

18 A. I can't tell you that. You
19 know, I mean, if there -- I just don't
20 recall exactly, but I think something
21 I read or something and in my mind I
22 said, Okay. That means that the
23 federal authorities must be
24 investigating.

25 That was my conclusion. It

1 must have been from the media that I'd
2 been reading and the way things were
3 going, different things that were
4 said, that, you know, there's a
5 possibility that that's happening.

6 At the same time, Jeffrey
7 Epstein had gone on another trip with
8 our -- well, which he had reported to
9 Europe. And so I recall speaking with
10 Shani and saying, you know, all the
11 reports -- she assured me that he did
12 do the reporting as required.

13 But yeah, I sensed that. And
14 it turned out that my senses, my hunch
15 came out to be true because then he
16 was arrested July, in July. I think
17 July 10th.

18 ATTORNEY ACKERMAN: Counsel,
19 when you get a chance, I could use
20 a break. I'm not saying -- I'm
21 not asking for one now, just
22 saying when it's a good --

23 THE WITNESS: Sure.

24 ATTORNEY ACKERMAN: --
25 breaking point.