

**In The Matter Of:**  
*UNITED STATES OF AMERICA, v.*  
*GHISLAINE MAXWELL,*

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*TRIAL*  
*December 1, 2021*

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*Southern District Court Reporters*

LC1VMAX1 Page 407

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 -----x  
4 UNITED STATES OF AMERICA,  
5  
6 v. 20 CR 330 (AJN)  
7  
8 GHISLAINE MAXWELL,  
9  
10 Defendant. Jury Trial  
11 -----x  
12 New York, N.Y.  
13 December 1, 2021  
14 8:55 a.m.  
15  
16 Before:  
17 HON. ALISON J. NATHAN,  
18 District Judge  
19  
20 APPEARANCES  
21  
22 DAMIAN WILLIAMS  
23 United States Attorney for the  
24 Southern District of New York  
25 BY: MAURENE COMEY  
ALISON MOE  
LARA POMERANTZ  
ANDREW ROHRBACH  
Assistant United States Attorneys  
  
HADDON MORGAN AND FOREMAN  
Attorneys for Defendant  
BY: JEFFREY S. PAGLIUCA  
CHRISTIAN R. EVERDELL  
LAURA A. MENNINGER  
-and-  
BOBBI C. STERNHEIM  
-and-  
RENATO STABILE  
  
Also Present: Amanda Young, FBI  
Paul Byrne, NYPD  
Sunny Drescher,  
Paralegal, U.S. Attorney's Office  
Ann Lundberg,  
Paralegal, Haddon Morgan and Foreman

LC1VMAX1 Page 408

1 (Trial resumed; jury not present)  
2 THE COURT: All right. Matters to take up, counsel,  
3 includes the Rule 16/608, as I see it, issue. And then I want  
4 to see where you are in terms of working out anticipated  
5 personal identifying information of witnesses who I've given  
6 permission to testify under pseudonyms to protect their  
7 privacy.  
8 So let's begin.  
9 Ms. Menninger, did you want to begin with the Rule 16  
10 issue?  
11 MS. MENNINGER: I think Mr. Everdell was going to  
12 handle that piece.  
13 THE COURT: Okay.  
14 Ms. Comey, are you taking this?  
15 MR. ROHRBACH: I'm taking this one, your Honor.  
16 THE COURT: You all swapped off.  
17 So I think the defense is clearly right that if we are  
18 talking by impeachment by contradiction, that is to say,  
19 impeachment, direct contradiction of something testified to on  
20 the stand, it's not required to be disclosed as case-in-chief  
21 material under Rule 16; and depending on what it is, it's  
22 likely not 608 because it's impeachment by contradiction, not  
23 impeachment to show -- extrinsic evidence to show a character  
24 for dishonesty and the like.  
25 So the question is whether it's impeachment or not.

LC1VMAX1 Page 409

1 And I still don't fully understand the photograph of the street  
2 that the witness read the line from saying, That's the address  
3 where we lived, how that's impeachment. That remains an open  
4 question in my mind.  
5 But otherwise, Mr. Rohrbach, do you disagree with  
6 anything I've just said as to the state of the law?  
7 MR. ROHRBACH: No, I think that that's a correct  
8 statement of the law, your Honor.  
9 The issue with the photograph is it wasn't established  
10 that that satisfied any of the theories of impeachment; and so  
11 if the defense is offering it for some other purpose, that  
12 purpose would be part of the defense's case-in-chief and,  
13 therefore, subject to Rule 16 or an attack on the witness's  
14 character for truthfulness, which would be barred by 608.  
15 THE COURT: Right.  
16 But the, I'll charitably call it, theory offered  
17 yesterday that anything that's not part of the case-in-chief  
18 somehow then falls under 608 as extrinsic, you've walked away  
19 from that.  
20 MR. ROHRBACH: Yes -- the theory really is that it has  
21 to satisfy some proper basis of impeachment for extrinsic  
22 evidence. So it's true that there are more than two paths,  
23 yes, your Honor.  
24 THE COURT: All right. So just to get to the  
25 photograph, as I see it, the witness's testimony -- and tell

LC1VMAX1 Page 410

1 me -- I don't know if this is Mr. Everdell or Ms. Menninger.  
2 MR. EVERDELL: It's me, your Honor.  
3 THE COURT: Okay.  
4 The witness testified, I believe, that at the time  
5 that she met Epstein and Ms. Maxwell, that she was living with  
6 her family in a pool house and she described that as homeless;  
7 correct?  
8 MR. EVERDELL: And she said that she lived in one  
9 place, I believe, continuously for her childhood. The  
10 testimony, what you just said, is accurate.  
11 THE COURT: Right. So then you've got the FBI 302 in  
12 which she said that she lived at a certain address at the time  
13 that she met them; correct?  
14 MR. EVERDELL: That's right.  
15 THE COURT: I think there's a question of whether that  
16 statement comes in as a prior inconsistent statement. I don't  
17 know that that was moved. But she said, in any event, she  
18 looked at it and it was a typo; so she addressed the apparent  
19 discrepancy, as I heard it. I'm not sure if you wanted to move  
20 the statement in as a prior inconsistent statement and let the  
21 jury resolve that dispute.  
22 But we moved on then to a current photograph of a  
23 street that had writing on it, an address and a date, and she  
24 said that's the street I lived in -- that's the street I lived  
25 on, which it just -- I think it suffered from a lot of

<p>LC1VMAX1 Page 411</p> <p>1 problems, but certainly wasn't directly impeaching of her 2 testimony. 3 MR. EVERDELL: Your Honor, I'm sorry. I just -- see 4 if we could back up. 5 Have we moved beyond the Rule 16 issue at this point 6 and we're just talking about -- 7 THE COURT: Well, if it's impeaching, then there's not 8 a Rule 16 issue. As I sit here, I don't know -- I don't see 9 that it's impeaching; so that if it's not impeaching, I'm not 10 sure what you're doing with it and it may be a Rule 16 issue. 11 MR. EVERDELL: If I can address that, your Honor, 12 because I think we disagree with what the state of the law is. 13 I think there's some disagreement on the courts about whether 14 or not if the defense is going to introduce something or talk 15 about something on cross-examination, whether that is 16 considered a Rule 16 document. 17 So what I understand the case law to be, your Honor, 18 is that they are trying to deal with the issue of where the 19 defense is trying to introduce affirmative proof in its own 20 case through the government's own witnesses. 21 THE COURT: For sure. Which is, let's face it, 22 usually what happens. There's often not a defense case. Both 23 cross-examination and impeachment testimony, as well as 24 affirmative evidence, comes in through cross-examination. 25 So I think the cases that say there's not a clear</p>	<p>LC1VMAX1 Page 413</p> <p>1 and those were introduced. 2 If we hypothetically had photos of that same island 3 before those houses were built, we don't, but if we did and we 4 wanted to introduce those through Larry Visoski, again, that 5 would be affirmative defense in the defense case-in-chief 6 introduced through the government's witness. That would be 7 Rule 16 which we'd have to disclose ahead of time. 8 THE COURT: Right. 9 MR. EVERDELL: Now, what we are talking about here is 10 what Witness 1, what Jane, remembers about the childhood, about 11 these events; it's about her recollection of everything, and 12 that is critical to the case. So misremembering details, 13 misremembering where she lived, not being able to recognize a 14 house, that all goes to her credibility as a witness, her 15 believability, any contradiction. 16 This is central to the case. Her memory of every 17 single detail of her childhood is central to the case, and that 18 is not case-in-chief material. That is, if she testifies to 19 something and we think we have something that contradicts what 20 she just said, like a photograph of her -- of a place where she 21 lived as a child, but she didn't seem to remember, that's 22 impeachment material. And we don't know if we're going to use 23 that until she says on the stand what she says on the stand. 24 We have it ready to go in case she says that, and she did in 25 this case, and so that's why we were able to use it or try to</p>
<p>LC1VMAX1 Page 412</p> <p>1 temporal time split, that is to say, you don't have to put on 2 your first witness, is not the question; it's a functional 3 question, are you putting on evidence in your case-in-chief as 4 opposed to impeachment testimony. 5 MR. EVERDELL: I think that's right, your Honor. 6 Let's give an example, because I think it's helpful to 7 use examples. I'll use one from this very case. 8 It's my understanding that the government wants to 9 introduce certain FedEx records through a FedEx document 10 custodian. The defense also would like to introduce other 11 FedEx records, coincidentally, through the same document 12 custodian. So if that happens, you'd have a witness called by 13 the government, the defense would want to introduce affirmative 14 proof in its case through that same witness. That would be 15 defense case-in-chief material which, by the way, we disclosed 16 in our Rule 16 letter to the government. That's an example, I 17 think, where the courts are talking about where you disclose 18 things -- where you have a witness where you are trying to put 19 on affirmative proof in the defense case through the 20 government's witness. That is an example where we don't 21 dispute. 22 I'll give another example. This is a hypothetical 23 one. Larry Visoski just testified. He was shown a number of 24 pictures of Little St. James Island where there were 25 structures, houses on the island. And he testified to those,</p>	<p>LC1VMAX1 Page 414</p> <p>1 use it, to show that she doesn't have an accurate recollection. 2 That is pure impeachment material. 3 THE COURT: Up to the point where you said it 4 contradicted what she said on the stand, you and I were in 5 vigorous agreement. 6 MR. EVERDELL: Okay. 7 THE COURT: Okay. 8 MR. EVERDELL: All right. 9 Well, what I would say is that we can't -- no, this is 10 not -- it's not as if we were going to introduce the photograph 11 of her house in our case-in-chief. We are doing this -- we had 12 it ready to be able to use it in case she said something that 13 we believe was contradictory and contradicted by the 14 photograph. So that's why we did not disclose it ahead of 15 time, because we believed it to be impeachment material. 16 By the way, Judge, I'll just note for the record that 17 when we sent our Rule 16 discovery several weeks ago to the 18 government, we included a cover letter, which I'm happy to 19 share with the Court -- 20 THE COURT: I can imagine it reserved all your rights. 21 And you can keep talking, but we remain in agreement. 22 MR. EVERDELL: Okay. And it cited all the cases that 23 we cited, and it said we do not consider impeachment material 24 or refreshing material case-in-chief material. 25 THE COURT: It is true. I think, Mr. Rohrbach agrees.</p>

<p>LC1VMAX1 Page 415</p> <p>1 The only question in any specific instance is is it impeaching, 2 and is it a prior inconsistent statement. We have to deal with 3 the rules around a prior inconsistent statement. It wasn't 4 like you had deposition testimony. You had an FBI agent's 5 write-up of notes which the witness was confronted with and 6 said it was a mistake. Again, that wasn't moved in, but we can 7 deal with that as it comes.</p> <p>8 There could be -- not here, but there could be 608 9 issues if you're trying to use extrinsic evidence. If what we 10 have is impeaching by contradiction, impeachment of what the 11 witness testified to on the stand, then it's not going to be a 12 608 issue.</p> <p>13 MR. EVERDELL: If we're impeaching the witness, yes, 14 that's right. And I just want to address the issue of 15 impeaching with extrinsic evidence, which I know the government 16 has raised. That rule is -- and the cases they cite --</p> <p>17 THE COURT: I know you cited Rule 613. I hadn't 18 understood their argument to be about 613.</p> <p>19 MR. EVERDELL: They raised in their papers the notion 20 that you can't impeach -- or you can't use extrinsic evidence 21 to impeach. But the rule there and the cases they've cited 22 stand for the unremarkable proposition that you can't 23 impeach -- or you can't use extrinsic evidence on a collateral 24 matter.</p> <p>25 THE COURT: Correct.</p>	<p>LC1VMAX1 Page 417</p> <p>1 The government also doesn't agree with the defense's 2 broad statement that anything that goes to this witness's 3 memory is a noncollateral matter. It's hard for us to know now 4 exactly what they plan to do. The government thinks we should 5 take that as it comes. But I think there's sort of broad 6 agreement about the general principles here, your Honor.</p> <p>7 MR. EVERDELL: If there's broad agreement, your Honor, 8 then there shouldn't be objections. If we have an issue with 9 the witness's memory that we believe we have a document or some 10 other information that contradicts what she's saying, then we 11 are allowed to cross on it.</p> <p>12 THE COURT: Okay. We'll take it as it comes, but we 13 agree on the principles. I think the only question is -- I 14 sustained the objection to admission of the photograph, because 15 it's not clear to me that it's impeaching. As I said, if it's 16 not impeaching, then it might be a Rule 16 issue; I wasn't 17 entirely sure what you were trying to do with it.</p> <p>18 You're welcome to -- if there's some basis to show a 19 photograph, to impeach something she suggested in her 20 testimony, then you can do that.</p> <p>21 MR. EVERDELL: Yes.</p> <p>22 THE COURT: Okay.</p> <p>23 MR. EVERDELL: Understood.</p> <p>24 MR. ROHRBACH: The government agrees, your Honor. The 25 issue with that particular photograph, setting aside the fact</p>
<p>LC1VMAX1 Page 416</p> <p>1 MR. EVERDELL: Her memory about anything to do with 2 this time period is not a collateral matter; she is a central 3 witness to this case.</p> <p>4 THE COURT: Well, again, I don't adopt that broad 5 statement. But to the extent you are attempting to impeach -- 6 so you have something that contradicts what she testified to on 7 the stand, then it's not a Rule 16 issue, I doubt it's a 613 -- 8 a 608 issue. We may have to deal with 613 questions and what 9 it is that we're looking at.</p> <p>10 MR. EVERDELL: Again, it's also not a 608 issue, I'd 11 say, your Honor, because that rule deals with conduct.</p> <p>12 THE COURT: I said it's not a 608 issue.</p> <p>13 MR. EVERDELL: Yes. Okay. I agree with you.</p> <p>14 MR. ROHRBACH: I'm a little confused, your Honor.</p> <p>15 I think we're agreeing that, as your Honor said, if 16 it's offered for impeachment with a proper basis for 17 impeachment and it's not about a collateral matter, then they 18 didn't have to disclose it in Rule 16. If it's to advance the 19 defense case, whether in the government's case or in the 20 defense case, then it should have been disclosed in Rule 16.</p> <p>21 There are things that the defense might expect to 22 offer for impeachment, but that might be impeachment about a 23 collateral matter or might be impeachment, but is not, in fact, 24 based on a contradiction or some other proper theory of 25 impeachment, in which case it is not an admissible exhibit.</p>	<p>LC1VMAX1 Page 418</p> <p>1 that the witness couldn't recognize it, and there are other 2 questions about admissibility than just whether it's relevant 3 or impeaching, is that it wasn't a direct contradiction of 4 anything the witness said on the stand; so it wasn't a proper 5 basis for impeachment. And if it advanced the defense case in 6 some other way, it would have been a Rule 16 --</p> <p>7 THE COURT: What is the government's understanding of 8 when the witness lived at the address that's referenced in the 9 302?</p> <p>10 MR. ROHRBACH: If I may ask Ms. Moe, who's taking the 11 rest to answer that question.</p> <p>12 THE COURT: Sure.</p> <p>13 MS. MOE: Yes, your Honor.</p> <p>14 I don't recall the particular date, but I think the 15 witness was beginning to clarify on cross-examination yesterday 16 that at some point while she was a teenager living in Palm 17 Beach, she moved to the second address. I don't recall the 18 specific date --</p> <p>19 THE COURT: And you say the second address, what do 20 you mean?</p> <p>21 MS. MOE: Yes, your Honor.</p> <p>22 THE COURT: I guess what do you mean by the first 23 address, do you mean the pool house?</p> <p>24 MS. MOE: Yes, your Honor. I believe the witness 25 would explain that at the time that all of this --</p>

<p>LC1VMAX1 Page 419</p> <p>1 THE COURT: Could you pull up the microphone. 2 MS. MOE: Yes, your Honor. I apologize. 3 THE COURT: Even though we're three days in, I still 4 can't hear you without the mic. 5 MS. MOE: I'm sorry. 6 THE COURT: That's okay. 7 MS. MOE: I believe the witness would explain that 8 when all of this began when she was 14, she was living in a 9 pool house because of her family's financial circumstances. 10 But at some point during the years that followed, her family 11 moved to a second house. 12 THE COURT: And that's the address listed in the 302, 13 as you understand it? 14 MS. MOE: I don't recall offhand whether that's the 15 particular address. I'd want to review the 3500. But I 16 believe the witness was clarifying that she lived at a second 17 house. 18 THE COURT: Okay. All right. 19 MR. EVERDELL: Your Honor, I'm sorry. 20 I believe -- and I'm checking this right now, but I 21 believe the address she put on her 1994 Interlochen application 22 was the address we were showing her the photograph of. And 23 she's saying she's in a pool house or homeless. So I think 24 this is impeaching. I think this goes directly -- 25 THE COURT: Again, she said she lived -- they move in</p>	<p>LC1VMAX1 Page 421</p> <p>1 MS. MENNINGER: It's a type-up of the agent's notes. 2 We also have the agent's handwritten notes. 3 The next sentence -- then I'll explain what I think we 4 may get to. The next sentence, she says, That home was a 5 three-bedroom home in a gated community called Bear Lake, 6 something like that. Those were the two statements that were 7 typed up in the agent's 302. 8 THE COURT: Okay. 9 MS. MENNINGER: And in the handwritten notes. 10 She's had a chance to explain it; in her mind, it's a 11 typo. We have those agents on call to be witnesses, and they 12 can talk about whether it was a typo or not a typo. I mean, I 13 think that's the state of play in terms of contradicting a 14 witness with a prior inconsistent statement. 15 THE COURT: Okay. Anything else on that? 16 MR. ROHRBACH: Nothing from the government. 17 MR. EVERDELL: No, your Honor. Thank you. 18 THE COURT: Do we have issues to take up around 19 specific identifying information? 20 MS. MOE: Yes, your Honor. 21 Just to provide the Court with an update on the status 22 of our conferral with defense counsel, defense counsel provided 23 the government with a list of certain topics this morning, 24 which we appreciated; and we had a productive conversation this 25 morning about a number of those topics, and I think I've</p>
<p>LC1VMAX1 Page 420</p> <p>1 the application. All she said about the photograph was, That's 2 the address that I lived in. And so we just don't have a -- 3 she looked at your photograph, she looked at the address 4 written on it; she said that's the address where I lived. 5 That's not yet in contradiction to her statement, because 6 there's a timeline issue. But you can try, again, to see if 7 there's a basis for impeachment. 8 MR. EVERDELL: All right. I'll leave it to 9 Ms. Menninger, who's going to be doing the cross. 10 THE COURT: Okay. 11 Any questions about that, Ms. Menninger? 12 MS. MENNINGER: No, your Honor. I think I can ask her 13 questions today that explain when she lived where -- 14 THE COURT: Great. 15 MS. MENNINGER: -- what was on her applications. What 16 she said in her 302, which was already discussed on the record, 17 is that she lived in the same place from the time she met 18 Epstein until she moved to New York. That was her statement. 19 She continued on -- 20 THE COURT: You mean that's the statement recorded in 21 the 302. 22 MS. MENNINGER: That is one of the statements recorded 23 in the 302 verbatim. 24 THE COURT: Right. Sorry, verbatim. She said it was 25 a typo. It's a type-up of agents' notes, is it not?</p>	<p>LC1VMAX1 Page 422</p> <p>1 narrowed the scope of any disagreement. 2 There are two remaining topics. And I think we've 3 agreed that before those topics are raised at a break or before 4 the jury comes out, we're going to confer with the witness's 5 counsel just to confirm what issues might be identifying as to 6 those two particular issues. I'm hopeful that we'll be able to 7 resolve any disagreement there, but we want to just work that 8 out before that comes out before the jury. And I think there 9 are one or two issues that we've agreed that won't be raised 10 without a sidebar in advance to discuss them. 11 THE COURT: Okay. Is there no way to do that now 12 while we're waiting for our jurors or -- 13 MS. MOE: Your Honor, I think defense counsel's 14 preference was to do that at a sidebar. 15 THE COURT: It's here. 16 MS. MOE: Yes, your Honor. 17 THE COURT: I just meant I'm happy to do it at the 18 sidebar, to the extent we're referencing the specific 19 identifying information. I just meant as a time saver can we 20 do it now. 21 MS. MENNINGER: I think there are two of the three 22 that we can do now; but the third one depends on what the 23 witness says, your Honor. 24 THE COURT: Okay. 25 Let me just get a check on our juror numbers.</p>

<p>LC1VMAX1 Page 423</p> <p>1 MS. MOE: Yes, your Honor. 2 Just to be clear, I think two of those topics were 3 ones that we wanted to just confer with the witness's attorney 4 about, because there may not be any disagreement; we just 5 wanted to confer with him to ensure we have that right. 6 I think there was one remaining topic that defense 7 counsel preferred to raise as it arises during the course of 8 cross-examination. That's what I meant by at sidebar. 9 Apologies. 10 THE COURT: Okay. So is there anything we can discuss 11 now at the sidebar or no? 12 MS. MENNINGER: There's two of the three we can 13 discuss at sidebar. I'm happy -- if the witness's counsel 14 wants to join us at the sidebar and weigh in on what counsel 15 thinks is identifying or not as we discuss it. 16 THE COURT: My preference would be for you to confer 17 first and then let me know. 18 MS. MOE: Yes, your Honor, that's what we would 19 propose. 20 THE COURT: Okay. 21 MS. MOE: Thank you. 22 THE COURT: All right. 23 Anything else we can take up now? 24 MS. MENNINGER: Yes, your Honor. 25 I conferred with the government. We have prepared,</p>	<p>LC1VMAX1 Page 425</p> <p>1 Anything to take up? 2 MS. MOE: Yes, your Honor. 3 I just wanted to report to the Court, we had a chance 4 to confer about those two issues. We've narrowed the scope of 5 disagreement to just one issue after conferring with the 6 witness's counsel, which we'd like to raise at sidebar. I 7 don't know how soon that will come up, so I defer to defense 8 counsel whether to do that now or whether it would be more 9 efficient to bring the jury out and deal with that at a break. 10 There's a second issue to flag, but let me just pause 11 there on that to see. 12 THE COURT: Sure. 13 Is it anytime soon, Ms. Menninger? 14 MS. MENNINGER: I don't think so, but I don't have it 15 all memorized. 16 THE COURT: Understand. Let's hope we get to the 17 break and then we'll take it. 18 What else? 19 MS. MOE: Yes, your Honor. 20 Defense counsel provided the government with a number 21 of exhibits, and we appreciated the chance to review those in 22 order to raise issues in advance. We just wanted to flag that 23 for two of those we anticipate there being a Rule 408 24 objection. Again, I don't know how quickly that will arise, so 25 I just wanted to alert that to the Court. We can take that up</p>
<p>LC1VMAX1 Page 424</p> <p>1 similar to the government and similar to what Mr. Everdell did 2 yesterday, 18 binders that have potentially admissible sealed 3 exhibits in them we would like to place under the jurors' 4 chairs, consistent with the practice on prior witnesses, to 5 only have them directed to a particular tab when and if the 6 Court admits a particular document that has identifying 7 information contained in it, if that's okay with your Honor. 8 THE COURT: Ms. Moe, is that fine with you? 9 MS. MOE: Your Honor, may I have just one moment? 10 (Counsel conferred) 11 MS. MOE: No, your Honor. Thank you. 12 THE COURT: Fine. Okay. So you can place the 13 binders. Anything else we can take up now, Ms. Menninger? 14 MS. MENNINGER: No, your Honor. I'm just going to 15 approach the witness stand at some point and re-place the 16 binder on the witness stand. 17 THE COURT: You may do that. 18 Ms. Moe, anything we can take up now? 19 MS. MOE: No, your Honor. 20 THE COURT: All right. I will step down. 21 I appreciate counsel conferring on the anonymity 22 issues and working through as much as you could. I greatly 23 appreciate that. I will see you in a few minutes. 24 (Recess) 25 THE COURT: All right. We have our jury.</p>	<p>LC1VMAX1 Page 426</p> <p>1 as it arises, but wanted to bring that to the Court's 2 attention. 3 In addition, defense counsel has notified the 4 government that they've provided binders of defense materials 5 for the jurors. It appears that -- we have not had a chance to 6 review those materials, but based on a sampling that defense 7 counsel has provided to the government, it appears a large 8 number of them are things like printouts from the internet and 9 otherwise. So we have concerns about jurors flipping through a 10 binder that would appear to contain a wide array of materials 11 that would not be admissible. And because we haven't examined 12 that binder, we have concerns about that. 13 I don't want to delay bringing the jury out, and so I 14 would just ask for an opportunity to be heard about that before 15 the jurors bring out any binders and begin flipping through 16 them. 17 MS. MENNINGER: I'm going to be asking them to look at 18 the binders at the outset at the beginning exhibits. I think 19 we've all come to believe -- 20 THE COURT: We're going to keep doing what we've been 21 doing, which is before the jury turns to it, the defense will 22 tell us what it is. If you have an objection before they turn 23 to it, you'll raise it and we'll deal with it. 24 MS. MOE: Yes, your Honor. Thank you. 25 THE COURT: Is there any general set of objections in</p>

<p>LC1VMAX1 Page 427</p> <p>1 that regard that we can --</p> <p>2 MS. MOE: Yes, your Honor.</p> <p>3 I think materials like printouts from the internet,</p> <p>4 things like tabloid articles, Wikipedia pages, we don't think</p> <p>5 are appropriate as exhibits before the jury, and so we would</p> <p>6 object to exhibits of that nature.</p> <p>7 In addition, the samples that we've been provided</p> <p>8 include --</p> <p>9 THE COURT: Doesn't it depend what it's being used --</p> <p>10 you have an internet objection, is that the -- what's the</p> <p>11 grounds for a blanket objection to internet material?</p> <p>12 MS. MOE: Yes, your Honor.</p> <p>13 I agree that we'll have to take these as they come.</p> <p>14 Thinking ahead, we can't conceive of a basis for offering</p> <p>15 things like Wikipedia articles with this witness or tabloid</p> <p>16 articles with this witness, but we recognize the Court will</p> <p>17 have to address that as it comes because we're not quite sure</p> <p>18 what the defense argument would be. We mostly just wanted to</p> <p>19 give the Court a preview of those issues that we anticipate</p> <p>20 arising.</p> <p>21 THE COURT: Okay.</p> <p>22 MS. MENNINGER: Your Honor, I feel like I'm trying to</p> <p>23 give them stuff in advance so they can be prepared and we can</p> <p>24 move this proceeding more quickly, but it will only come up</p> <p>25 when and if it comes up.</p>	<p>LC1VMAX1 Jane - cross Page 429</p> <p>1 testifying under a pseudonym.</p> <p>2 With that, Ms. Menninger, you may continue.</p> <p>3 MS. MENNINGER: Thank you, your Honor.</p> <p>4 JANE,</p> <p>5 called as a witness by the Government,</p> <p>6 having been previously duly sworn, testified as follows:</p> <p>7 CROSS-EXAMINATION (continued)</p> <p>8 BY MS. MENNINGER:</p> <p>9 Q. Good morning, Jane.</p> <p>10 A. Good morning.</p> <p>11 Q. I'd like to pick up again with your Interlochen</p> <p>12 applications, all right? You don't need to open the binder</p> <p>13 until we let you know. Thank you.</p> <p>14 You are aware that Interlochen awards financial aid;</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. You are aware that Interlochen awards scholarships;</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. You went there for three years in the summers?</p> <p>21 A. Yes.</p> <p>22 Q. Ages 13 to 17 -- 16?</p> <p>23 A. 16, yes.</p> <p>24 Q. No, 17; I think you turned 17 in your final summer.</p> <p>25 THE COURT: Is that a question?</p>
<p>LC1VMAX1 Page 428</p> <p>1 THE COURT: All right. Then we'll take it -- I'm</p> <p>2 going to try to minimize sidebars, so we have to keep moving.</p> <p>3 My request always is if there are things that you</p> <p>4 think are likely to require a discussion to address</p> <p>5 admissibility, that you do raise them in advance. Confer. If</p> <p>6 you disagree, raise them.</p> <p>7 I think at this point we'll bring out the jury. I'll</p> <p>8 ask you to keep trying to do that as we go, so we use our time</p> <p>9 efficiently. But it makes no sense to have the jury sitting</p> <p>10 idly now.</p> <p>11 MS. MOE: Thank you, your Honor.</p> <p>12 THE COURT: We'll bring in the jury.</p> <p>13 Can we bring in the witness.</p> <p>14 (Witness present)</p> <p>15 (Jury present)</p> <p>16 THE COURT: Good morning, ladies and gentlemen of the</p> <p>17 jury. Nice to see you. Thank you so much for your punctuality</p> <p>18 and attention and diligence. I greatly appreciate it. I hope</p> <p>19 you had a good evening.</p> <p>20 We will continue with Ms. Menninger's</p> <p>21 cross-examination of the witness who's testifying under the</p> <p>22 pseudonym "Jane."</p> <p>23 I remind Jane that you are under oath.</p> <p>24 I do remind the sketch artists that pursuant to my</p> <p>25 order, please don't sketch exact likeness of the witness who is</p>	<p>LC1VMAX1 Jane - cross Page 430</p> <p>1 MS. MENNINGER: Yes.</p> <p>2 THE COURT: Did you turn 17 in your final summer?</p> <p>3 THE WITNESS: Sorry, I'm doing the math. 14, 15 --</p> <p>4 no, 16.</p> <p>5 Q. Your brothers went there as well?</p> <p>6 A. Yes.</p> <p>7 MS. MENNINGER: If we could turn to J-3, which has</p> <p>8 already been admitted. And there is a little green flag for</p> <p>9 you to get to the J exhibits more quickly.</p> <p>10 And your Honor, because J-3 has been admitted, I would</p> <p>11 ask at this time that the jurors be permitted to access the</p> <p>12 smaller binder under their chairs which has J-3 in it.</p> <p>13 THE COURT: Just one moment.</p> <p>14 Without objection?</p> <p>15 MS. MOE: No objection, your Honor.</p> <p>16 THE COURT: Okay. Jurors, you may pick up the smaller</p> <p>17 binder please and turn to J-3. Thank you.</p> <p>18 BY MS. MENNINGER:</p> <p>19 Q. Have you found J-3?</p> <p>20 A. Yes.</p> <p>21 Q. I think as we discussed yesterday, that's your name on this</p> <p>22 application; correct?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. And at the top line above your name, the question was</p> <p>25 asked: Are you applying for scholarship/financial aid;</p>

<p>LC1VMAX1 Jane - cross Page 431</p> <p>1 correct?</p> <p>2 A. Correct.</p> <p>3 Q. And you checked off no; correct?</p> <p>4 A. Correct.</p> <p>5 Q. I want to ask you to turn to the second page of that</p> <p>6 exhibit. And on the second page, you described what kind of</p> <p>7 classes you wanted to apply for; correct?</p> <p>8 A. Correct.</p> <p>9 Q. You wrote that: When asked about something difficult,</p> <p>10 nothing has been difficult for me; correct?</p> <p>11 A. I guess I did.</p> <p>12 Q. You were involved in the school of the arts as we</p> <p>13 discussed, right?</p> <p>14 A. Yes.</p> <p>15 Q. Costuming, acting, improvisation, right?</p> <p>16 A. Yes.</p> <p>17 Q. Plays, performances, movies, right?</p> <p>18 A. Correct.</p> <p>19 Q. This was at the age of 13, right?</p> <p>20 A. Yes.</p> <p>21 Q. And then just below that, it has the names of some</p> <p>22 individuals who offered letters of recommendation for you,</p> <p>23 right?</p> <p>24 A. Right.</p> <p>25 Q. When you were 13; correct?</p>	<p>LC1VMAX1 Jane - cross Page 433</p> <p>1 THE COURT: I thought you did, too. I have just the</p> <p>2 government exhibits.</p> <p>3 MS. MENNINGER: Can she put it on the screen, your</p> <p>4 Honor?</p> <p>5 THE COURT: That would be fine. That is, I think,</p> <p>6 what we were doing in part yesterday.</p> <p>7 MS. MENNINGER: My apologies.</p> <p>8 J-3, and we're on page 6.</p> <p>9 THE COURT: Go ahead, Ms. Menninger.</p> <p>10 BY MS. MENNINGER:</p> <p>11 Q. On page 6, we have a letter of recommendation for you. Do</p> <p>12 you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Glowing letter of recommendation, right?</p> <p>15 A. Yes, it looks like it.</p> <p>16 Q. And the person that is referred to who performed or wrote</p> <p>17 that letter of recommendation gave her qualifications, right?</p> <p>18 A. Yes.</p> <p>19 Q. Her credentials, right?</p> <p>20 A. Yes.</p> <p>21 Q. She was then on the board of the Palm Beach School of the</p> <p>22 Arts, right?</p> <p>23 A. I didn't know that till I just saw it.</p> <p>24 Q. Well, it's in your application, right? You solicited this</p> <p>25 letter of recommendation from her; correct?</p>
<p>LC1VMAX1 Jane - cross Page 432</p> <p>1 A. Correct.</p> <p>2 Q. And then your signature is on that page, right?</p> <p>3 A. Yes.</p> <p>4 Q. And then the next page in this exhibit are some photographs</p> <p>5 of yourself, right --</p> <p>6 A. Yes.</p> <p>7 Q. -- that you submitted?</p> <p>8 A. Yes.</p> <p>9 Q. These were all taken before you had turned 14, right?</p> <p>10 A. Yes.</p> <p>11 Q. All of them on the page?</p> <p>12 A. Yes.</p> <p>13 Q. All right. If we could turn to page -- well, actually,</p> <p>14 yes, the next page, 4. That also has your address at the time;</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. And one more page, page 6. That is one of the letters of</p> <p>18 recommendation for you; correct?</p> <p>19 THE COURT: Ms. Menninger, could I have a binder? I</p> <p>20 don't think I have it. That's the government exhibits.</p> <p>21 MS. MENNINGER: Your Honor --</p> <p>22 THE COURT: If you don't, that's okay.</p> <p>23 MS. MENNINGER: No, no. I believe for this one we</p> <p>24 gave you one yesterday, but I could be wrong about that. If I</p> <p>25 could just check with Ms. Lundberg.</p>	<p>LC1VMAX1 Jane - cross Page 434</p> <p>1 A. Yes.</p> <p>2 Q. And she was presently on the -- formerly, I'm sorry, a</p> <p>3 director of the Professional Children's School; correct?</p> <p>4 A. Correct.</p> <p>5 Q. And that's the school that you ultimately went to in New</p> <p>6 York for senior year, right?</p> <p>7 A. Yeah.</p> <p>8 Q. And she was glowing in her support of your application to</p> <p>9 go to Interlochen when you were 13 years old; correct?</p> <p>10 A. Correct.</p> <p>11 Q. I want to direct your attention to the last page in that</p> <p>12 exhibit, page 11. If I could have you read the third full</p> <p>13 paragraph; but, of course, omit your family name from that</p> <p>14 reading. If you could read it out loud.</p> <p>15 A. The third paragraph?</p> <p>16 Q. Yes, that begins with "Each."</p> <p>17 A. Each child has their own individual personality and talent,</p> <p>18 but all three reflect the qualities of a strong, loving family</p> <p>19 background. The arts have always been a common interest with</p> <p>20 music as a binding love. The family organized and underwrote</p> <p>21 an annual charity performance for our school. After attending</p> <p>22 their Festival of Lights, our school community has always felt</p> <p>23 we had witnessed the rebirth of the von Trapp family.</p> <p>24 Q. The von Trapp family, is that right?</p> <p>25 A. Yes.</p>



<p>LC1VMAX1 Jane - cross Page 435</p> <p>1 Q. And this was a reference to you and your two brothers, 2 right? 3 A. Yes. 4 Q. I also believe, just in case it wasn't audible, it said 5 that you and your two brothers came from a strong and loving 6 family background; is that right? 7 A. That's what it says. 8 Q. I want to turn to -- and we could show for the Court -- 9 what's been marked for identification as J-4. But you're 10 certainly welcome, Jane, to turn to that in paper form. 11 THE COURT: Not the jurors. 12 MS. MENNINGER: Not the jurors. 13 THE COURT: Please wait till I direct you. Please 14 wait till I direct you. You can close your binders. 15 Thank you. 16 MS. MENNINGER: It's going to come out again, I hope 17 soon. 18 BY MS. MENNINGER: 19 Q. Do you recognize this document? 20 A. I do not recognize the document per se. 21 Q. J-4? 22 A. But I recognize my signature. 23 Q. Okay. Do you believe that this is your application? 24 A. Yes. 25 Q. And to the same Interlochen Arts Camp?</p>	<p>LC1VMAX1 Jane - cross Page 437</p> <p>1 Q. That was submitted in October of 1994? 2 A. Yes. 3 Q. And that would be for the summer of 1995? 4 A. Yes. 5 Q. Up again on the top line above your name there is a 6 question: Are you applying for financial aid? 7 MS. MENNINGER: Oh, the jurors can look at J-4 now, if 8 that's okay. 9 THE COURT: Without objection? 10 MS. MOE: No objection, your Honor. 11 THE COURT: You may open your binder to J-4, please. 12 Thank you. 13 Q. So we see your name in the top portion of the application, 14 right? 15 A. Yes. 16 Q. And then above that, are you applying for financial aid, 17 and you checked no; correct? 18 A. Correct. 19 Q. If you want to turn to page 2 of that exhibit, up on the 20 top line there are some references and one is your father's 21 name; is that right? 22 A. Yes. 23 Q. And then next to that was your teacher from Palm Beach 24 School of the Arts, right? 25 A. Yes.</p>
<p>LC1VMAX1 Jane - cross Page 436</p> <p>1 A. Yes. 2 Q. And do you see the date on the upper right-hand corner? 3 A. Yes. 4 Q. And that would have been an application for the next year, 5 for the next summer, is that fair? 6 A. Yes. 7 Q. All right. 8 MS. MENNINGER: Your Honor, at this time I'm moving 9 for the admission of J-4, which I previously discussed with the 10 government. 11 MS. MOE: No objection, your Honor. We would just ask 12 that it be under seal and that any identifying information not 13 be read into the record. 14 THE COURT: Okay. J-4 is admitted. It's admitted 15 under seal consistent with my ruling that this witness may 16 testify under pseudonym. And if any reference -- if any 17 reading of the document occurs, everyone is admonished not to 18 use the identifying information. 19 (Defendant's Exhibit J-4 received in evidence) 20 BY MS. MENNINGER: 21 Q. So if you need to turn on the second page, I think it has 22 your signature, just for reference sake. Do you see that? 23 A. Yes. 24 Q. Do you believe this is your application? 25 A. Yes.</p>	<p>LC1VMAX1 Jane - cross Page 438</p> <p>1 Q. And then below that, again, it gave a little summary of 2 where you were in your career in October of '94; correct? It 3 talked about you had done commercials, right? 4 A. A couple. 5 Q. Many performances singing, right? 6 A. Yes. 7 Q. Plays, skits, etc., right? 8 A. Yes. 9 Q. You had been in the New York Broadway production of Joseph 10 and the Amazing Technicolor Dreamcoat; correct? 11 A. I was not in the New York production. 12 Q. It was a local production? 13 A. It was -- it was the touring company in Florida. 14 Q. Okay. 15 MS. MOE: Your Honor, may I have just a moment to 16 confer with defense counsel? 17 THE COURT: You may. 18 (Counsel conferred) 19 MS. MOE: Thank you, your Honor. 20 Q. And again, you said: Nothing has been very difficult for 21 me. Correct? 22 A. I guess I did. 23 Q. On the next page you had submitted a letter asking to take 24 extra classes the next summer, right? 25 A. Yeah.</p>

<p>LC1VMAX1 Jane - cross Page 439</p> <p>1 Q. And your address on this application for the summer of '95</p> <p>2 is the same address as the one that was on your application for</p> <p>3 the summer of '94; correct?</p> <p>4 A. Correct.</p> <p>5 MS. MENNINGER: All right. And then if we could --</p> <p>6 not the jurors, if the jurors could wait a minute, could we</p> <p>7 have the witness identify what's been marked as J-5, which is</p> <p>8 the next exhibit?</p> <p>9 THE COURT: Jurors, close your binders please. And</p> <p>10 keep them on your laps, but close them. Thank you.</p> <p>11 Q. Do you see the exhibit at J-5?</p> <p>12 A. Yes.</p> <p>13 Q. And that has your signature as well, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And there's a date on the upper left-hand corner, do you</p> <p>16 see that date?</p> <p>17 A. Yes.</p> <p>18 Q. And do you believe this to be your application for the</p> <p>19 summer of 1996?</p> <p>20 A. Yes.</p> <p>21 Q. All right.</p> <p>22 MS. MENNINGER: At this time I would move for the</p> <p>23 admission of J-6.</p> <p>24 MS. MOE: No objection, your Honor. We'd ask that</p> <p>25 this exhibit be received under seal for the same reasons.</p>	<p>LC1VMAX1 Jane - cross Page 441</p> <p>1 same teacher who had supported you from the prior year's</p> <p>2 application; correct?</p> <p>3 A. Correct.</p> <p>4 Q. And then if we could turn the page to the next page, on</p> <p>5 page 2 of J-5, in the second box down from the top, there's a</p> <p>6 label "Financial Information." Do you see that box?</p> <p>7 A. Yes.</p> <p>8 Q. And in that box it asks: Are you applying for financial</p> <p>9 aid? And you said no. Correct?</p> <p>10 A. Correct.</p> <p>11 Q. And then the next line says: Does the student applying</p> <p>12 expect to be the recipient of any funds, scholarship, grant,</p> <p>13 award, or prize from any country, state, organization, or</p> <p>14 individual specifically for attendance at the Interlochen Arts</p> <p>15 Camp. And you checked no. Correct?</p> <p>16 A. Correct.</p> <p>17 Q. And then on that same page there is a little newspaper</p> <p>18 clip; correct?</p> <p>19 A. Correct.</p> <p>20 Q. And I won't say the names of any performances, but it's</p> <p>21 talking about some performances that you and your brothers had</p> <p>22 performed in the area, right?</p> <p>23 A. Yes.</p> <p>24 MS. MENNINGER: And if I may have one second, your</p> <p>25 Honor?</p>
<p>LC1VMAX1 Jane - cross Page 440</p> <p>1 THE COURT: Okay. J-6 is admitted. It's admitted</p> <p>2 under seal, consistent with my ruling --</p> <p>3 MS. MENNINGER: I'm sorry, J-5 for 1996.</p> <p>4 THE COURT: Oh, I apologize, J-5. J-5 is admitted</p> <p>5 under seal consistent with my ruling that this witness may</p> <p>6 testify under a pseudonym, and without objection from the</p> <p>7 government.</p> <p>8 (Defendant's Exhibit J-5 received in evidence)</p> <p>9 THE COURT: I'll direct, Ms. Moe, the jury to look at</p> <p>10 the binder, J-5.</p> <p>11 MS. MOE: Yes, your Honor.</p> <p>12 THE COURT: All right.</p> <p>13 Jurors, you may look at J-5 please.</p> <p>14 BY MS. MENNINGER:</p> <p>15 Q. So on J-5 we have your signature there again; correct?</p> <p>16 A. Correct.</p> <p>17 Q. And you were applying for the high school level, right?</p> <p>18 A. Yes.</p> <p>19 Q. And you had a new address for this application for the</p> <p>20 summer of 1996; correct?</p> <p>21 A. Yes.</p> <p>22 Q. That address is the one we talked about yesterday that was</p> <p>23 in the Bear Lake Estates gated community, right?</p> <p>24 A. Yes.</p> <p>25 Q. I want to show you, at the bottom of that page, it's the</p>	<p>LC1VMAX1 Jane - cross Page 442</p> <p>1 THE COURT: You may.</p> <p>2 (Counsel conferred)</p> <p>3 Q. And that you and your brothers had performed the last week</p> <p>4 for a School of the Arts performance locally; correct?</p> <p>5 A. Correct.</p> <p>6 Q. And then you were going to be performing in another city in</p> <p>7 Florida in the upcoming days; is that right?</p> <p>8 A. That's right.</p> <p>9 Q. And then it said in April that you would be traveling to</p> <p>10 Italy for a vocal competition; correct?</p> <p>11 A. Correct, with my school.</p> <p>12 Q. And so this was in -- this was dated in 1996, right?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. All right. And then if we could go to the last -- I'm</p> <p>15 sorry, page 5 of that exhibit we touched on briefly yesterday.</p> <p>16 On page 5 of that exhibit, it gives the camp fee structure for</p> <p>17 Interlochen for you for that summer, right?</p> <p>18 A. It looks like it, yeah.</p> <p>19 Q. And it's \$4,025 for the summer; correct?</p> <p>20 A. Correct.</p> <p>21 Q. And you signed under that as well as your mother, right?</p> <p>22 A. Yes.</p> <p>23 Q. And on none of these three applications is there any</p> <p>24 mention of Jeffrey Epstein; correct?</p> <p>25 A. Correct.</p>

<p>LC1VMAX1 Jane - cross Page 443</p> <p>1 Q. And there's no mention of Ghislaine Maxwell; correct?</p> <p>2 A. Correct.</p> <p>3 MS. MENNINGER: All right. At this point, if we could</p> <p>4 ask the jurors to close the binders, your Honor.</p> <p>5 THE COURT: Please do. Thank you.</p> <p>6 Q. I want to talk about the first time that you say you met</p> <p>7 Mr. Epstein and Ms. Maxwell, okay?</p> <p>8 A. Okay.</p> <p>9 Q. And you claim that was in 1994 when you were 14, right?</p> <p>10 A. Yes.</p> <p>11 Q. You testified yesterday on direct examination that you were</p> <p>12 sitting with friends at a picnic table, and a tall, thin woman</p> <p>13 approached you with a dog. And you chitchatted with her, and</p> <p>14 then a man came and joined her, right?</p> <p>15 A. Right.</p> <p>16 Q. You recalled a lot of details about that incident in 1994,</p> <p>17 right?</p> <p>18 A. Yes.</p> <p>19 Q. You remember that the man had a newspaper under his arm</p> <p>20 which he put down on the table, right?</p> <p>21 A. Right.</p> <p>22 Q. You remember that you were on a break from classes, right?</p> <p>23 A. Right.</p> <p>24 Q. You were eating an ice cream cone and the man said, I think</p> <p>25 I know your mom. That's what you testified to yesterday;</p>	<p>LC1VMAX1 Jane - cross Page 445</p> <p>1 Q. And when you spoke to your younger brother about this</p> <p>2 initial meeting, you also told him that you only met Epstein;</p> <p>3 correct?</p> <p>4 A. I don't recall.</p> <p>5 Q. You didn't tell him anything about meeting a woman;</p> <p>6 correct?</p> <p>7 A. I don't recall.</p> <p>8 Q. And you also gave an interview to a news source about this</p> <p>9 initial meeting; correct?</p> <p>10 A. Correct.</p> <p>11 Q. And when you spoke to that news source, you told the news</p> <p>12 person, journalist, that you were approached by Epstein;</p> <p>13 correct?</p> <p>14 A. Correct.</p> <p>15 Q. You said nothing about Ghislaine being there?</p> <p>16 A. I don't remember what I said.</p> <p>17 Q. All right. Could I have you -- and only you and not the</p> <p>18 jurors -- take a look at J-13.</p> <p>19 MS. MENNINGER: And for the Court and the witness we</p> <p>20 could put it on the screen.</p> <p>21 If I could direct the witness's attention to page 2 of</p> <p>22 that document.</p> <p>23 Q. Are you at page 2?</p> <p>24 A. Yes.</p> <p>25 Q. And on the fourth paragraph, you told the reporter that</p>
<p>LC1VMAX1 Jane - cross Page 444</p> <p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. All right. You gave some statements about that meeting to</p> <p>4 several people over the course of the last 20 years, right?</p> <p>5 A. Yes.</p> <p>6 Q. You spoke to your brother, your older brother Brian within</p> <p>7 a few days of that meeting, right?</p> <p>8 A. I'm sorry, can you -- a few days of the meeting back in</p> <p>9 1994?</p> <p>10 Q. Right.</p> <p>11 A. I don't recall.</p> <p>12 Q. Well, isn't it true that you told your brother Brian that</p> <p>13 you had been approached by Epstein?</p> <p>14 A. I don't recall.</p> <p>15 Q. Isn't it true that you told your brother Brian that Epstein</p> <p>16 said he knew your dad and admired him?</p> <p>17 A. I don't recall.</p> <p>18 Q. Isn't it true you told Brian nothing about Ghislaine</p> <p>19 Maxwell being there at all; correct?</p> <p>20 A. I don't recall.</p> <p>21 Q. Do you remember talking to your younger brother about it</p> <p>22 over the last 20 years?</p> <p>23 A. Over the last 20 years?</p> <p>24 Q. Yes.</p> <p>25 A. Yes.</p>	<p>LC1VMAX1 Jane - cross Page 446</p> <p>1 Epstein approached you; correct?</p> <p>2 A. Correct.</p> <p>3 Q. You didn't say anything to the reporter about Ghislaine</p> <p>4 being there; correct?</p> <p>5 A. Correct.</p> <p>6 Q. You spoke to the government for the first time, as we</p> <p>7 discussed yesterday, in September of 2019; correct?</p> <p>8 A. I don't recall the exact date.</p> <p>9 Q. Well, you were there in California with your lawyers and</p> <p>10 Ms. Moe and some others; correct?</p> <p>11 A. Correct.</p> <p>12 Q. And what happened when you spoke to them then is you were</p> <p>13 asked about the first time that you met Ghislaine, right?</p> <p>14 A. Right.</p> <p>15 Q. And what you told the government on that day with your</p> <p>16 attorneys there is that Ghislaine walked by with her dog;</p> <p>17 correct?</p> <p>18 A. I don't recall my exact vernacular.</p> <p>19 (Continued on next page)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p>LC1Qmax2 Jane - Cross Page 447</p> <p>1 BY MS. MENNINGER: (Continued)</p> <p>2 Q. And you told the government that only Epstein came up to</p> <p>3 meet you, correct?</p> <p>4 MS. MOE: Objection, your Honor.</p> <p>5 MS. MENNINGER: 3509-002, page 1.</p> <p>6 THE COURT: Can I have it on the screen?</p> <p>7 MS. MENNINGER: Yes, your Honor. 3509-002.</p> <p>8 Q. What you told the government on September 19 of 2019 is</p> <p>9 that Ghislaine walked by with her dog and Jeffrey Epstein came</p> <p>10 up to meet you, correct?</p> <p>11 A. I wouldn't have said that.</p> <p>12 Q. So, the (inaudible) again.</p> <p>13 (Reporter inquired)</p> <p>14 MS. MOE: Objection, your Honor.</p> <p>15 THE COURT: You cut out. I think I heard the</p> <p>16 question, but can you repeat the question?</p> <p>17 Q. So the FBI got it wrong again?</p> <p>18 MS. MOE: Objection, your Honor.</p> <p>19 THE COURT: Overruled. You may answer.</p> <p>20 A. Maybe they typed it up wrong.</p> <p>21 Q. What you told the government is that -- well, what you</p> <p>22 testified to yesterday is that both Ghislaine and Jeffrey told</p> <p>23 you that they give scholarships, correct?</p> <p>24 A. I don't remember which -- I know Jeffrey said it.</p> <p>25 Ghislaine was standing there.</p>	<p>LC1Qmax2 Jane - Cross Page 449</p> <p>1 Maxwell, correct?</p> <p>2 A. I don't know.</p> <p>3 Q. Well, did the person invite you to Maxwell's house?</p> <p>4 A. No.</p> <p>5 Q. Invited you to Epstein's house, correct?</p> <p>6 A. Correct.</p> <p>7 Q. With your mother, right?</p> <p>8 A. Yes.</p> <p>9 Q. And when you got to Epstein's house with your mother, it</p> <p>10 was 15 or 20 minutes away from your house, right?</p> <p>11 A. Yes.</p> <p>12 Q. It was in -- your house was in West Palm Beach, right?</p> <p>13 A. No, not at this time. It was in Palm Beach.</p> <p>14 Q. You didn't cross any state lines, did you?</p> <p>15 A. No.</p> <p>16 Q. When you got to Epstein's house for tea, you and your</p> <p>17 mother sat by the pool?</p> <p>18 A. Yes.</p> <p>19 Q. You were the only people there?</p> <p>20 A. Yes.</p> <p>21 Q. Ghislaine was not there?</p> <p>22 A. I don't recall.</p> <p>23 Q. Well, you spoke to the government in October of 2021, so</p> <p>24 two months ago. Do you recall speaking with them two months</p> <p>25 ago?</p>
<p>LC1Qmax2 Jane - Cross Page 448</p> <p>1 Q. And that's right. Ghislaine didn't walk by?</p> <p>2 A. No, she was right there.</p> <p>3 Q. And Jeffrey said, can I give scholarships?</p> <p>4 A. I cannot remember his exact verbiage this many years later.</p> <p>5 Q. And Jeffrey said, can I have your mom's phone number?</p> <p>6 A. Yes.</p> <p>7 Q. Not Ghislaine asking for your mom's phone number?</p> <p>8 A. No.</p> <p>9 Q. You testified yesterday that you were sitting on a park</p> <p>10 bench with your friends, right?</p> <p>11 A. Yes.</p> <p>12 Q. And when you filed your civil lawsuit in January of 2020</p> <p>13 you said you were sitting alone on a bench between classes,</p> <p>14 correct?</p> <p>15 A. I don't recall what was written.</p> <p>16 Q. I want to talk about the second meeting that you had with</p> <p>17 Mr. Epstein. You went back home after camp that summer?</p> <p>18 A. Yes.</p> <p>19 Q. And you started school for the school year, right?</p> <p>20 A. Yes.</p> <p>21 Q. You testified yesterday that a few days after you got back</p> <p>22 to school, someone from Epstein's office called your mom,</p> <p>23 right?</p> <p>24 A. Yes.</p> <p>25 Q. That someone from Epstein's office was not Ghislaine</p>	<p>LC1Qmax2 Jane - Cross Page 450</p> <p>1 A. Yes. So I was sitting -- it was only the three of us</p> <p>2 having tea, yes. I don't recall if Ghislaine was in the house.</p> <p>3 Q. Well, what you said to the government in October of 2021 at</p> <p>4 3509-28 in the handwritten notes is, it was just Epstein, mom</p> <p>5 and you present, correct?</p> <p>6 MS. MOE: Again, your Honor, I think we've been over</p> <p>7 reading documents that are not in evidence.</p> <p>8 THE COURT: That statement is not inconsistent, so</p> <p>9 I'll sustain the objection with respect to that statement.</p> <p>10 Q. At the first tea, the only people there were you and your</p> <p>11 mom and Epstein, correct?</p> <p>12 A. Yes.</p> <p>13 Q. You never reported to the government that Ms. Maxwell was</p> <p>14 present for the tea, correct?</p> <p>15 A. That's right.</p> <p>16 Q. During the conversation, Epstein told you he gives</p> <p>17 scholarships and mentors people, right?</p> <p>18 A. Yes.</p> <p>19 Q. He said he does that; not we do that, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And he did not refer to Ms. Maxwell at all during your</p> <p>22 initial meeting with him, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Wasn't a part of the conversation?</p> <p>25 A. No.</p>

<p>LC1Qmax2 Jane - Cross Page 451</p> <p>1 Q. After this tea with your mother, you went back to Epstein's 2 house, correct? 3 A. Correct. 4 Q. Yesterday you testified that for the first few months when 5 you spent time with Epstein in Palm Beach, you were there by 6 yourself. Do you remember that testimony? 7 A. I'm sorry, can you repeat that? 8 Q. Yesterday you testified that for the first few months when 9 you spent time with Jeffrey Epstein in Palm Beach, you were 10 there by yourself? 11 A. By myself as in without my mother. 12 Q. Right. You said -- 13 A. Yes. 14 Q. You were -- 15 A. Yes, yes, without my mother. 16 Q. And then you clarified that your mother did not go back to 17 his house with you for meetings because she was "not invited." 18 That was your testimony yesterday, correct? 19 A. Correct. 20 Q. That is not what you told the government when you met with 21 them in September of 2019, is it? 22 A. I don't know. 23 Q. What you told the government in September of 2019, 24 including Ms. Moe, is "In the beginning, I would be with my 25 mother and brother"?</p>	<p>LC1Qmax2 Jane - Cross Page 453</p> <p>1 Q. And you said that that sweet Latin American man picked you 2 up every week or two while you were 14, 15 and 16 years old? 3 A. Correct. 4 Q. So approximately a hundred times he picked you up over 5 three years every week or two. That's your testimony, correct? 6 A. I'm not good at math, but I wouldn't recall how many times. 7 Q. Well, you testified under oath yesterday -- 8 A. Okay. 9 Q. -- that it was every week or two for three years, right? 10 A. Yes. 11 Q. All right. You were asked yesterday by the government how 12 these meetings at Epstein's house were typically arranged. Do 13 you remember that question? 14 A. Yes. 15 Q. And you said yesterday it was Ghislaine calling the house 16 or Jeffrey's office calling the house like an assistant or 17 something. Do you remember that testimony? 18 A. Yes. 19 Q. That's not what you told the government in November of 2019 20 when you met with them then. And if we could turn to 3509-003 21 at page 1, fourth paragraph? 22 MS. MOE: I'm sorry, I didn't hear the number. 23 Q. 3509-003, first page, fourth paragraph. 24 MS. MOE: Thank you. 25 Q. What you told the government on that occasion is you were</p>
<p>LC1Qmax2 Jane - Cross Page 452</p> <p>1 MS. MOE: I object to just reading documents. 2 THE COURT: Let me see it. Let me see it before you 3 read, I'll see it, okay? And then you can make your objection, 4 Ms. Moe, and I'll rule. 5 MS. MOE: Thank you, your Honor. 6 THE COURT: Let me have the passage first. 7 MS. MENNINGER: It's going to be in 3509-001 on the 8 second page, in the fourth paragraph beginning in the middle of 9 the paragraph. 10 THE COURT: Ms. Moe? 11 MS. MOE: Your Honor, if the question is whether she 12 made that statement, we have no objection. 13 THE COURT: Go ahead. 14 MS. MENNINGER: Thank you. 15 Q. What you said to Ms. Moe and the agents was, "In the 16 beginning, I would be with my mother and brothers at Epstein's 17 house," correct? 18 A. I don't recall that. 19 Q. You told the government nothing about your mother wasn't 20 invited back to Epstein's house, correct? 21 A. I don't recall. 22 Q. And you talked thereafter about being driven repeatedly to 23 Epstein's house by a chauffeur who was a sweet Latin American 24 man, correct? 25 A. Correct.</p>	<p>LC1Qmax2 Jane - Cross Page 454</p> <p>1 not sure if Maxwell ever called you to make appointments, 2 correct? 3 A. I don't recall. I don't know. 4 Q. And then on the next page in the same interview in the 5 first paragraph, same document, next page, you said, "When in 6 Florida, Epstein or his office would call your house," right? 7 A. I guess so. 8 Q. You didn't say Maxwell would call your house, right? 9 A. I guess -- I don't know. I guess so. 10 Q. And so two years later, now you remember that Ghislaine 11 called your home to make appointments, right? 12 A. Right. 13 Q. That memory has come back to you in the last two years? 14 A. Well, memory is not linear. 15 Q. Do you remember that Mr. Epstein came to your house for 16 dinner? 17 A. Yes. 18 Q. In Bear Lakes Estate? 19 A. Yes. 20 Q. Right? And he came to your house with your mother and your 21 brothers there, correct? 22 A. Yes. 23 Q. Ghislaine was not there? 24 A. No. 25 Q. You recall that that did not happen right at the beginning</p>

<p>LC1Qmax2 Jane - Cross Page 455</p> <p>1 of your meeting with Mr. Epstein, right?</p> <p>2 A. Right.</p> <p>3 Q. And it was a year or two after meeting Epstein that he came</p> <p>4 to your house for dinner, correct?</p> <p>5 A. I don't know the timeline, but it was at the new house.</p> <p>6 Q. Well, in February of 2020, you told the government -- this</p> <p>7 is at 3509-008, page 12.</p> <p>8 THE COURT: What paragraph?</p> <p>9 Q. The fourth full paragraph beginning with the word "this."</p> <p>10 At the end of that paragraph -- I'm sorry -- the middle of that</p> <p>11 paragraph is that you said to the government, "They visited you</p> <p>12 one to two times at your house in Florida. This was about a</p> <p>13 year or two after meeting him," correct?</p> <p>14 A. Correct, I guess.</p> <p>15 Q. So then you remembered it was a year or two, but you don't</p> <p>16 remember it today. Is that right?</p> <p>17 A. Well, I'm trying to be very accurate, so I don't know. I</p> <p>18 just know it's at the new house.</p> <p>19 Q. And the dinner that you had at your house was prior to any</p> <p>20 abuse?</p> <p>21 A. That's not true.</p> <p>22 Q. Well, in the same interview in February of 2020, at page</p> <p>23 11 --</p> <p>24 MS. MOE: Your Honor, I'd object to counsel testifying</p> <p>25 about --</p>	<p>LC1Qmax2 Jane - Cross Page 457</p> <p>1 A. Yes.</p> <p>2 Q. You traveled to Los Angeles to visit and stay with one of</p> <p>3 them there, correct?</p> <p>4 A. I don't recall what year, but, yes, at some point.</p> <p>5 Q. You remember staying with her in Los Angeles, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Before you lived in Los Angeles?</p> <p>8 A. Yes.</p> <p>9 Q. So it was while you were still in high school, right?</p> <p>10 A. Yes.</p> <p>11 Q. And you traveled to Boston to visit the other sister,</p> <p>12 correct?</p> <p>13 A. No, that's the same sister.</p> <p>14 Q. Same sister, a different time?</p> <p>15 A. Yes.</p> <p>16 Q. In high school, right?</p> <p>17 A. Middle school -- no, middle school and then, okay, once in</p> <p>18 high school.</p> <p>19 Q. And your own sisters took you shopping on occasion,</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. They took you to the movies, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Over the years, they've talked to you about your</p> <p>25 boyfriends, correct?</p>
<p>LC1Qmax2 Jane - Cross Page 456</p> <p>1 THE COURT: We're going to keep doing -- point to the</p> <p>2 passage. You'll read it, Ms. Moe. You'll let me know if</p> <p>3 there's an objection, okay?</p> <p>4 MS. MOE: Yes, your Honor.</p> <p>5 THE COURT: So where are we reading?</p> <p>6 Q. On page 11 of that same document in the last full</p> <p>7 paragraph, second sentence.</p> <p>8 THE COURT: Okay. No objection. You may proceed,</p> <p>9 Ms. Menninger.</p> <p>10 Q. What you told the government on that occasion is that at</p> <p>11 some point Maxwell and Epstein came to your house prior to the</p> <p>12 abuse, correct?</p> <p>13 A. Correct.</p> <p>14 Q. You mentioned on direct examination that you felt Ghislaine</p> <p>15 had kind of become your big sister, right?</p> <p>16 A. Right.</p> <p>17 Q. And you have two older sisters as we discussed yesterday,</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. One is approximately ten years older than you, right?</p> <p>21 A. Right.</p> <p>22 Q. One is approximately 15 years older than you, correct?</p> <p>23 A. Yes.</p> <p>24 Q. During the time you were in high school, you traveled to</p> <p>25 see your sisters?</p>	<p>LC1Qmax2 Jane - Cross Page 458</p> <p>1 A. No.</p> <p>2 Q. You have not talked to your sisters about your boyfriends?</p> <p>3 A. I never had any boyfriends.</p> <p>4 Q. You've never had a boyfriend?</p> <p>5 A. Not in high school, I didn't.</p> <p>6 Q. Sorry. My question was had you ever over the years spoken</p> <p>7 to your sisters about boyfriends?</p> <p>8 A. Over the years, yes.</p> <p>9 Q. Because yesterday you suggested that you hadn't had normal</p> <p>10 relationships, right?</p> <p>11 A. Right.</p> <p>12 Q. But you have had boyfriends for multiple years at a time,</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. You talked a little bit about Ghislaine and Epstein taking</p> <p>16 you to see the movies; you said that's something that you guys</p> <p>17 did together, right?</p> <p>18 A. Yes.</p> <p>19 Q. You went to a movie theater in the area of Epstein's house</p> <p>20 in Florida, correct?</p> <p>21 A. Correct.</p> <p>22 Q. Which is a nice area, right?</p> <p>23 A. Right.</p> <p>24 Q. They were normal movie theaters?</p> <p>25 A. Yes.</p>

<p>LC1Qmax2 Jane - Cross Page 459</p> <p>1 Q. Sometimes other girls went with you, right?</p> <p>2 A. Yes.</p> <p>3 Q. And Epstein would direct who was supposed to sit where in</p> <p>4 the movie theater, correct?</p> <p>5 A. Correct.</p> <p>6 Q. And he did not sit next to you in the movie theater,</p> <p>7 correct?</p> <p>8 A. I don't remember.</p> <p>9 Q. Well, let's turn -- well, not you, but we'll look at</p> <p>10 February 27 of 2020 when you spoke with the government,</p> <p>11 3509-008 on page 3.</p> <p>12 MS. MOE: Your Honor, could we have just a very brief</p> <p>13 sidebar about this issue?</p> <p>14 THE COURT: Can you tell me what paragraph I'm</p> <p>15 reading? And then yes.</p> <p>16 MS. MENNINGER: It's going to be on page 4 at the end</p> <p>17 of the paragraph that began on the page 3, the last sentence.</p> <p>18 (Continued on next page)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>LC1Qmax2 Jane - Cross Page 461</p> <p>1 government on that date.</p> <p>2 THE COURT: Your theory is everything that she -- when</p> <p>3 you ask her, "What did you say on this date to the government,"</p> <p>4 she says, "I don't remember."</p> <p>5 MS. MENNINGER: Her story has changed like a hundred</p> <p>6 thousand times, and that is exactly what the problem is here,</p> <p>7 your Honor.</p> <p>8 THE COURT: Well, here's the problem: There is a way</p> <p>9 you can get in her story has changed, but what you're doing and</p> <p>10 what -- I don't know what the limits to this would be. You're</p> <p>11 asking her very specific questions about multiple instances of</p> <p>12 reporting, and when she said "I don't remember what I said in</p> <p>13 that moment," you're then introducing the statements of what</p> <p>14 she said.</p> <p>15 MS. MENNINGER: I can say, isn't it true that you said</p> <p>16 this? That's the other way to phrase it.</p> <p>17 THE COURT: You could say "do you recall saying this</p> <p>18 to the government"? If she says no, then you move on.</p> <p>19 MS. MENNINGER: Right. That's all I've been doing.</p> <p>20 THE COURT: Is that right?</p> <p>21 MS. MOE: Yes, your Honor. I think we're talking</p> <p>22 about two different scenarios. The first is, for example, if</p> <p>23 Ms. Menninger asked the witness, "Did this meeting happen on a</p> <p>24 particular date" or you know "were you living in the blue</p> <p>25 house" for example. If the witness says, "I don't remember,"</p>
<p>LC1Qmax2 Jane - Cross Page 460</p> <p>1 (At the sidebar)</p> <p>2 MS. MOE: Thank you, your Honor. And I apologize for</p> <p>3 asking for a sidebar, but I'm hoping this will streamline</p> <p>4 things. The issue is at a number of times the witness has</p> <p>5 testified that she doesn't recall, and instead of showing the</p> <p>6 witness the document and asking if that refreshes her</p> <p>7 recollection, which is the only thing that would be proper at</p> <p>8 that juncture, I believe counsel is now just reading reports</p> <p>9 into the record, which is not proper.</p> <p>10 THE COURT: Well, the question was yesterday you</p> <p>11 testified --</p> <p>12 (Pause)</p> <p>13 THE COURT: So, yes, she said she didn't remember if</p> <p>14 Epstein directed where they sat.</p> <p>15 MS. MENNINGER: Your Honor, under 613, I'm not</p> <p>16 obligated to show the witness a prior statement before I ask</p> <p>17 her about it. I have to give her an opportunity --</p> <p>18 THE COURT: She said she didn't remember. What's the</p> <p>19 inconsistency?</p> <p>20 MS. MENNINGER: Well, your Honor, her not remembering</p> <p>21 I don't have to refresh her recollection. Her memory is at</p> <p>22 issue in this case. If she can't remember what she said a</p> <p>23 month ago or two months ago or a year ago, that's relevant to</p> <p>24 the jury's determination. Then we can put on evidence through</p> <p>25 other witnesses that that is in fact what she said to the</p>	<p>LC1Qmax2 Jane - Cross Page 462</p> <p>1 then we're talking about refreshing her recollection with a</p> <p>2 document. If the witness says something that Ms. Menninger</p> <p>3 believes to be inconsistent with a prior statement, the</p> <p>4 question then is instead, not a document, but do you recall --</p> <p>5 like isn't it true that you told the government X? And if the</p> <p>6 witness says, "I don't remember that," then that's the record.</p> <p>7 If the witness says, "Yes, I said that," then that's the</p> <p>8 impeachment.</p> <p>9 The documents themselves are impeachment by collateral</p> <p>10 material. The proper way to do this is to ask the witness</p> <p>11 whether she said something or not. If she denies it, then the</p> <p>12 way to do that is through the witnesses to that meeting, and</p> <p>13 not by asking the witness to read a document that she didn't</p> <p>14 prepare into the record, which is what's happening.</p> <p>15 THE COURT: Well, what I understand you to be saying</p> <p>16 is you want first her to show it to her and see if it refreshes</p> <p>17 her recollection.</p> <p>18 MS. MOE: Yes, your Honor, if she says she doesn't</p> <p>19 recall. If she denies the fact and the point is to impeach her</p> <p>20 with a fact of a prior inconsistent statement --</p> <p>21 THE COURT: Well, I think the window of disagreement</p> <p>22 is not just an inconsistent statement but that she doesn't</p> <p>23 recall -- no, I think you're right. So if she doesn't recall</p> <p>24 what she said in a meeting, you can refresh her recollection as</p> <p>25 to what she said. If she says, "I didn't say that" or "I don't</p>

LC1Qmax2	Jane - Cross	Page 463	LC1Qmax2	Jane - Cross	Page 465
1	recall," you can say, "Didn't you say the following to the FBI		1	Epstein told you where to sit. She says, "I don't remember."	
2	agent," and then --		2	It's not an inconsistent statement. That's the difference.	
3	MS. MENNINGER: So I believe that I do not have to		3	Then you can refresh her on what she said. But if what you're	
4	refresh for impeachment, but I can ask her --		4	doing is -- right? What's inconsistent about you saying, "You	
5	THE COURT: You're claiming that because she doesn't		5	said X to the agent," and she says, "I don't remember." Is	
6	recall what she said, it's an inconsistent statement. There's		6	that an inconsistency?	
7	not an inconsistency there.		7	MS. MENNINGER: The statement that she gave yesterday	
8	MS. MENNINGER: So, I can ask her, "Did you say this?"		8	versus what her statement to the agent that's what I'm trying.	
9	She can say, "I don't recall." And then I can say, "Isn't it		9	THE COURT: I let you do that. I let you do that.	
10	true you said it on this date?" And she can say, "No, I		10	Just now the example that drew the objection you said Epstein	
11	didn't" or "I still don't recall."		11	didn't -- you told the agent you didn't sit next to Epstein and	
12	THE COURT: Every trial I've been to with these		12	she said "I don't remember."	
13	materials I've presided over -- and there's been a lot in ten		13	MS. MENNINGER: Okay. So I will show her for that	
14	years -- this precise thing happens. You testified X. Didn't		14	type of example --	
15	you tell the agent some variation of x or Y.		15	THE COURT: But I agree with you if you have a prior	
16	I don't remember way said to the agent.		16	statement that is inconsistent with testimony, that's when	
17	You show them the 302. Does that refresh your		17	we're there.	
18	recollection, or didn't you -- and didn't you say if it doesn't		18	MS. MOE: Yes, your Honor and in that scenario, it's a	
19	refresh your recollection and then you get to do precisely what		19	question: Did you say that to the agent on this date? If not,	
20	you're doing.		20	showing the witness the document and asking her to read it into	
21	MS. MENNINGER: Your Honor, may I get the statute book		21	the record. The question is, did you make that statement?	
22	because it says right in 613.		22	MS. MENNINGER: I just asked.	
23	THE COURT: Sure.		23	THE COURT: I agree. I think you did it right up	
24	MS. MENNINGER: Yesterday I tried to show the witness		24	until this moment when we didn't have and inconsistent	
25	an exhibit and I was directing her to when the exhibit was made		25	statement? We're in vigorous disagreement.	
LC1Qmax2	Jane - Cross	Page 464	LC1Qmax2	Jane - Cross	Page 466
1	and what the date of the interview was, and nobody liked that.		1	MS. STERNHEIM: Vigorously.	
2	So today I tried --		2	(In open court)	
3	THE COURT: I don't think I sustained an objection to		3	(Continued on next page)	
4	that.		4		
5	MS. MENNINGER: Well, I said here's the date and then		5		
6	there was an objection at the time. But in Rule 613(a), it		6		
7	says: When showing or disposing the statement during		7		
8	examination. When examining a witness about the witness' prior		8		
9	statement, a party need not show it or disclose its contents to		9		
10	the witness. But the party must on request show it or disclose		10		
11	its contents to an adversary party's attorney.		11		
12	And so because I don't believe I have to show it to		12		
13	her. If I want to prove it later with extrinsic evidence, she		13		
14	has to be given an opportunity to explain or deny the statement		14		
15	and the adversary party is given an opportunity to examine the		15		
16	witness about it. That's the way I read that rule.		16		
17	THE COURT: So the extrinsic evidence of a witness'		17		
18	prior inconsistent statement. My point is if she says she		18		
19	doesn't remember, it's not an inconsistent statement. You have		19		
20	to get to a point of inconsistency.		20		
21	MS. MENNINGER: Here is the inconsistency.		21		
22	THE COURT: When you're doing it based on what she		22		
23	testified to yesterday, if there's a difference, yes.		23		
24	MS. MENNINGER: That's what I've been trying to do.		24		
25	THE COURT: Here you're saying on this date you said		25		



LC1Qmax2	Jane - Cross	Page 467	LC1Qmax2	Jane - Cross	Page 469
1	THE COURT: Ms. Menninger, you can take off your mask.		1	decide where everyone sat, correct?	
2	I want to pause. Counsel, one of the exhibits		2	A. Correct.	
3	referenced was not in one of the jurors' binders, so I want to		3	Q. And you told them that you did not sit next to Epstein,	
4	just correct that.		4	right?	
5	Ms. Williams, can you let counsel know what exhibit it		5	A. Right.	
6	was?		6	Q. But when you were in the movie theater, nothing sexual was	
7	MS. MENNINGER: My apologies, your Honor. We'll get		7	happening; you weren't sitting next to him, right?	
8	that fixed.		8	A. Right.	
9	THE COURT: Thank you. And thank you to the juror for		9	Q. Yesterday you spoke about the first time that you saw	
10	alerting us.		10	Ghislaine without her clothes on, correct?	
11	MS. MENNINGER: If there is anyone else that has a		11	A. Yes.	
12	problem.		12	Q. You said that happened shortly after the first incident in	
13	Thank you, your Honor.		13	the pool house, correct?	
14	THE COURT: I apologize for that. I'm grateful to the		14	A. Correct.	
15	jurors. If anything like that happens, feel free to kind of		15	Q. And you described that you were just hanging out and all of	
16	raise your hand in the moment and we'll have Ms. Williams as		16	a sudden Epstein demanded that you follow him upstairs, right?	
17	she always does, make things right.		17	A. I'm sorry, can you clarify which --	
18	(Pause)		18	Q. The first time that you saw Ghislaine without her clothes	
19	THE COURT: I think we're not in the binders at the		19	on is what you claimed. Do you remember that?	
20	moment, so while Mr. Everdell is working on that, you'll		20	A. The first time I saw her without a top on was by the pool.	
21	proceed.		21	Q. Yesterday Ms. Moe asked you about the first time you saw	
22	MS. MENNINGER: Thank you, your Honor.		22	Ghislaine without her clothes on. Do you recall that?	
23	BY MS. MENNINGER:		23	A. I -- I don't recall which question you were referring to or	
24	Q. I believe we were talking about you going to the movies		24	I don't recall, sorry.	
25	with Epstein and Ghislaine. Do you remember that?		25	Q. You don't recall the first time you saw Ghislaine without	
LC1Qmax2	Jane - Cross	Page 468	LC1Qmax2	Jane - Cross	Page 470
1	A. Yes.		1	her clothes on?	
2	Q. And isn't it true that you told the government that you did		2	A. Yes, I do recall, but to be specific, topless or completely	
3	not sit next to Epstein in the movie theaters?		3	naked?	
4	A. I don't recall.		4	Q. The question from Ms. Moe was the first time you saw	
5	Q. Okay. If I could have you look at 3509-008, page 4, in the		5	Ghislaine with her clothes off, and you didn't have any	
6	binder sorry. Just you.		6	question about what she meant.	
7	A. Sorry, 35 what?		7	MS. MOE: Objection to form.	
8	Q. It's in the first set.		8	THE COURT: Sustained.	
9	A. Okay.		9	Q. Yesterday you were asked:	
10	Q. She'll show it to you, I apologize.		10	"Q. Did there ever come a time when you saw Ghislaine Maxwell	
11	THE COURT: It's on the screen.		11	without her clothes on?"	
12	Q. 004 -- I'm sorry, page 4 of 008, and the top paragraph and		12	Do you recall that question?	
13	the last line of that top paragraph.		13	A. Yes.	
14	A. Okay.		14	Q. And you said yes?	
15	Q. You told the agents that Epstein would decide where		15	A. Yes.	
16	everyone sat?		16	Q. You didn't say her top or not her top?	
17	A. Yes.		17	MS. MOE: Objection to form.	
18	Q. Correct?		18	THE COURT: Overruled.	
19	MS. MOE: Objection, your Honor. Same issue. The		19	Q. Right?	
20	question is whether that refreshes her recollection.		20	A. Right.	
21	THE COURT: Go ahead.		21	Q. And you described a whole scenario where you claim you and	
22	Q. Does it refresh your recollection what you told the		22	Epstein and Ghislaine went upstairs and there was fondling in a	
23	government?		23	room. Do you recall relating that to this jury yesterday?	
24	A. Yes.		24	A. Yes.	
25	Q. And what you told the government is that Epstein would		25	Q. When you spoke with the government in December of 2019, you	

<p>LC1Qmax2 Jane - Cross Page 471</p> <p>1 told them that you do not have a specific memory of the first 2 time with Ghislaine? 3 MS. MOE: Objection to form. 4 THE COURT: Sustained. 5 Q. Yesterday did you give a specific memory of the first time 6 that you recall being in a massage scenario with Ghislaine? 7 A. Yes. 8 Q. All right. And when you spoke with the government in 9 December of 2019, you told them you do not have a specific 10 memory of the first time with Ghislaine. 11 MS. MOE: Objection to form. 12 THE COURT: That's not a question. 13 Q. Isn't it true that you told the government in December of 14 2019 that you do not have a specific memory of the first time 15 with Ghislaine? 16 MS. MOE: Objection to form. 17 THE COURT: Overruled. 18 A. I don't recall. 19 Q. You did not tell the government in December of 2019 about a 20 scenario of you following Ghislaine and Jeffrey upstairs and 21 the three of you were alone, correct? 22 A. I don't recall. 23 Q. In fact, there was a period of time that you claim that it 24 was just you and Jeffrey alone, and you had not been present 25 with Ghislaine?</p>	<p>LC1Qmax2 Jane - Cross Page 473</p> <p>1 specific -- 2 MS. MOE: Objection to form. 3 MS. MENNINGER: That was just admitted. I'm just 4 laying the foundation for the next question. That was the last 5 thing. 6 MS. MOE: Your Honor, I'm not sure what the question 7 is. 8 THE COURT: You don't have a question yet. Go ahead. 9 BY MS. MENNINGER: 10 Q. Because you have no specific memory of your first time with 11 Ghislaine in December of 2019, you have come up with that 12 memory in the last two years, the one you gave yesterday, 13 correct? 14 MS. MOE: Objection to form. 15 THE COURT: Overruled. 16 A. I come up with -- I don't believe I've come up with a 17 memory, no. 18 Q. Well, you gave a memory to the jury yesterday that you 19 didn't have in December of 2019, right? 20 A. I don't recall. 21 Q. You then later met with the government in February of 2020, 22 right? 23 A. Right. 24 Q. And what you told the government in February of 2020 is 25 that the first time you were involved with Ghislaine, there</p>
<p>LC1Qmax2 Jane - Cross Page 472</p> <p>1 MS. MOE: Objection to form. 2 THE COURT: Sustained. I don't understand the time 3 frame of that question. 4 Q. Yesterday you testified that it was shortly after the pool 5 house that you had this incident with Epstein and Ghislaine, 6 right? 7 A. Right. 8 Q. When you spoke with the government before, you said that 9 some period of time, months went by before you ever had an 10 incident with Ghislaine, correct? 11 MS. MOE: Objection to form. 12 THE COURT: I will sustain it. You've drawn on 13 different meetings with the government. You have to specify 14 which one you're talking about so that the witness can answer 15 whether she recalls or not. 16 Q. Previously you told the government you do not have a 17 specific memory of your first time with Ghislaine. 18 MS. MOE: Objection to form. 19 MS. MENNINGER: This is just foundational to the next 20 question. 21 THE COURT: But give a -- give what you are asking 22 about, give the date that you're asking about. 23 Q. In December of 2019, you told the government you do not 24 have a specific memory of your first time with Ghislaine. 25 Moving on from that, because you do not have a</p>	<p>LC1Qmax2 Jane - Cross Page 474</p> <p>1 were two other girls there as well, correct? 2 A. I don't recall. 3 Q. At 3509-008, page 4, first full paragraph, beginning in the 4 middle of the paragraph. 5 MS. MOE: And, your Honor, is the question whether 6 that refreshes the witness' recollection? 7 THE COURT: That will be the question. Go ahead. 8 Q. Does it refresh your recollection to read the sentence 9 beginning with the first time? Yes or no. 10 A. Yes. 11 Q. It refreshes your recollection, it's true that you told the 12 government that the first time with Maxwell, there were two 13 other girls there as well, correct? 14 A. Correct, but the wording that was typed up on this isn't 15 correct, so I don't know how to -- 16 Q. Another typo by the government? 17 MS. MOE: Objection, your Honor. 18 THE COURT: Overruled. 19 Q. It's another typo? 20 A. Yes. 21 Q. So, yesterday you gave a story that is different from 22 December 2019 when you had no specific memory and is different 23 from February 2020 when there were two other girls there as 24 well, correct? 25 MS. MOE: Objection. Compound.</p>

LC1Qmax2	Jane - Cross	Page 475	LC1Qmax2	Jane - Cross	Page 477
1	THE COURT: Sustained.		1	A. I'm sorry, can you repeat that?	
2	Q. Yesterday you testified that there were times when		2	Q. You told the government you have no memory of Ghislaine	
3	Ghislaine was in the room with you and Epstein, correct?		3	being present when you claim Epstein engaged in any sexual	
4	A. Correct.		4	contact with you, correct?	
5	Q. And you remember those times, right?		5	A. I don't recall.	
6	A. Not all, but yes.		6	Q. You told the government that Ghislaine never discussed any	
7	Q. When you spoke with the government at the February 2020		7	sexual abuse with you, right?	
8	meeting, they asked you if there were times where it was just		8	A. Whether she discussed abuse with me?	
9	you, Epstein and Ghislaine in the room, and you said you were		9	Q. Right.	
10	not sure, correct?		10	A. Right.	
11	A. I don't recall.		11	Q. It was very compartmentalized. It was never discussed.	
12	Q. You said you were not sure that ever happened, correct?		12	A. Yes.	
13	A. I don't recall.		13	Q. No one gave you any feedback afterwards. It was never	
14	Q. You were not sure where it happened, correct?		14	mentioned, right?	
15	A. I don't recall.		15	A. Right.	
16	Q. You only remembered being solely with Epstein and going		16	Q. No one asked you if Epstein had fun, right?	
17	back to the group setting, correct?		17	A. I don't recall.	
18	A. I don't recall.		18	MS. MENNINGER: Can I have one moment, your Honor?	
19	Q. It is true that you do not recall Ghislaine ever touching		19	THE COURT: You may.	
20	you?		20	(Pause)	
21	A. That's not true.		21	Q. So if we could go back to your conversations with the	
22	Q. When you spoke to the government in December of 2019 with		22	government in February of 2020, and if I could direct your	
23	your lawyers there, and you told the government at that time		23	attention to 3509-008 at page 5, in the second paragraph, I'm	
24	you are not sure whether Maxwell ever touched you during these		24	going to ask you if this refreshes your recollection?	
25	encounters, correct?		25	MS. MOE: Your Honor, about what?	
LC1Qmax2	Jane - Cross	Page 476	LC1Qmax2	Jane - Cross	Page 478
1	A. I don't recall.		1	THE COURT: Yes.	
2	Q. You told the government that you're not sure that Maxwell		2	MS. MENNINGER: Something that she earlier said she	
3	ever kissed you, correct?		3	doesn't recall.	
4	A. I don't recall.		4	THE COURT: Well, you will have to ask it again.	
5	Q. You told the government that Ghislaine never used sex toys		5	MS. MENNINGER: I will.	
6	or vibrators on you, correct?		6	THE COURT: You will ask the question again.	
7	A. That's correct.		7	Q. Before she does it, okay.	
8	Q. You told the government that you don't recall Ghislaine		8	You said you don't recall whether or not you ever told	
9	ever giving you a talk about how to massage Epstein, correct?		9	the government that you and Ghislaine and Jeffrey were alone	
10	A. I don't recall.		10	together in the room. You were not sure that ever happened.	
11	Q. You told the government that Ghislaine never saw you		11	Do you recall that testimony?	
12	perform oral sex on Epstein, correct?		12	A. I don't recall that, no.	
13	A. That's correct.		13	Q. If I could have you look at 3509-008, page five, the last	
14	Q. You told the government that Ghislaine never saw you		14	paragraph, the first sentence in that paragraph, if you could	
15	perform hand jobs on Epstein, to use your words, correct?		15	read that to yourself, tell me whether that refreshes your	
16	A. I don't recall.		16	recollection?	
17	Q. You told the government that Ghislaine never saw you		17	A. It doesn't, but I read it, yeah.	
18	involved in any masturbation with Epstein, correct?		18	Q. So, what you told the government on February 27, 2020 --	
19	A. I don't -- know or I don't recall.		19	MS. MOE: Objection, your Honor.	
20	Q. You told the government that Ghislaine never saw you		20	THE COURT: Overruled.	
21	engaged in sexual intercourse with Epstein, correct?		21	Q. -- is that when asked if there were times when it was only	
22	A. Correct.		22	you, Epstein and Ghislaine in the room, you said you were not	
23	Q. You told the government you have no memory of Ghislaine		23	sure, correct?	
24	being present when you claim Epstein engaged in any sexual		24	A. That's what it says.	
25	contact with you, correct?		25	Q. You were not sure that ever happened in February of 2020,	

<p>LC1Qmax2 Jane - Cross Page 479</p> <p>1 right?</p> <p>2 MS. MOE: Your Honor, objection. Is the question</p> <p>3 whether she made the statement, whether she remembers it,</p> <p>4 whether she's reading it from a document it's very unclear.</p> <p>5 THE COURT: You will rephrase, please.</p> <p>6 Q. As you sit here today, you're not sure whether you were</p> <p>7 ever in the room alone with Ghislaine and Epstein, correct?</p> <p>8 A. No.</p> <p>9 Q. I asked you if you recall telling the government that</p> <p>10 Ghislaine never touched you?</p> <p>11 A. I don't recall that.</p> <p>12 Q. If I could have you take a look at 3509-005. That's going</p> <p>13 to be difficult.</p> <p>14 On page 3 of 3509-005, in the second full paragraph in</p> <p>15 the middle of the paragraph there's a sentence that begins with</p> <p>16 your name, and I would like you to read that and tell me if</p> <p>17 that refreshes your recollection that you said that to the</p> <p>18 government in December of 2019?</p> <p>19 A. Which paragraph?</p> <p>20 Q. The second full paragraph in the middle of the paragraph</p> <p>21 beginning with your name.</p> <p>22 A. Yes.</p> <p>23 (Continued on next page)</p> <p>24</p> <p>25</p>	<p>LC1VMAX3 Jane - cross Page 481</p> <p>1 MS. MENNINGER: Your Honor, is now an appropriate time</p> <p>2 for a break? I was about to start another area.</p> <p>3 THE COURT: All right. We can take our morning break.</p> <p>4 Members of the jury, we'll take about a ten-minute</p> <p>5 break. Thank you.</p> <p>6 (Jury not present)</p> <p>7 THE COURT: Matters to take up, counsel?</p> <p>8 Just a moment. You may step out, Jane. Thank you.</p> <p>9 Everyone may be seated.</p> <p>10 MS. MOE: Thank you, your Honor.</p> <p>11 Just two --</p> <p>12 THE COURT: Just a moment. Go ahead.</p> <p>13 MS. MOE: Thank you, your Honor.</p> <p>14 Two issues to raise.</p> <p>15 The first is the issue that we raised earlier this</p> <p>16 morning about the remaining anonymity issue. Happy to raise</p> <p>17 that at this time, if it's appropriate. I don't know if it's</p> <p>18 coming up soon in cross-examination.</p> <p>19 THE COURT: Okay.</p> <p>20 MS. MOE: But we would prefer to raise that at sidebar</p> <p>21 because it relates to anonymity.</p> <p>22 The second issue is the Rule 408 issue I flagged this</p> <p>23 morning relating to documents we received a few minutes before</p> <p>24 the beginning of the court day. Happy to front that issue now</p> <p>25 while we have a break if the Court would like to hear that</p>
<p>LC1VMAX3 Jane - cross Page 480</p> <p>1 BY MS. MENNINGER:</p> <p>2 Q. Does that refresh your recollection that you told the</p> <p>3 government you do not have a recollection and are not sure if</p> <p>4 Ghislaine touched you during these encounters; correct?</p> <p>5 A. I don't recall.</p> <p>6 Q. Isn't it true that's what you told the government on that</p> <p>7 date?</p> <p>8 A. I don't remember, but it's written here.</p> <p>9 Q. I want to turn back to your statement that you don't recall</p> <p>10 whether you ever told the government that Ghislaine did not see</p> <p>11 you performing oral sex on Epstein. Is that what you told the</p> <p>12 government?</p> <p>13 A. I don't remember.</p> <p>14 Q. If I could have you look at 3509-008 at page 10. And I ask</p> <p>15 you to look at the first full paragraph and the last sentence</p> <p>16 of that paragraph. Does that refresh your recollection of</p> <p>17 whether Ghislaine was ever present for instances of oral sex</p> <p>18 between you and Epstein?</p> <p>19 A. Correct.</p> <p>20 Q. It's true that you don't know whether Ghislaine was ever</p> <p>21 present for you having oral sex in any way with Epstein;</p> <p>22 correct?</p> <p>23 A. I don't remember.</p> <p>24 Q. That's what you told the government, didn't you?</p> <p>25 A. I don't remember.</p>	<p>LC1VMAX3 Jane - cross Page 482</p> <p>1 issue.</p> <p>2 THE COURT: Okay. Go ahead.</p> <p>3 MS. MOE: So with respect to the Rule 408 issue,</p> <p>4 defense counsel has provided the government this morning just</p> <p>5 before the Court day with a few documents they've marked as</p> <p>6 exhibits.</p> <p>7 THE COURT: One moment. Go ahead.</p> <p>8 MS. MOE: Those two documents are correspondence</p> <p>9 between Jane's attorney and the victim compensation fund, as</p> <p>10 well as correspondence from Jane's attorney and Ms. Menninger's</p> <p>11 law firm.</p> <p>12 To the extent defense counsel intends to offer these</p> <p>13 as exhibits, there's a Rule 408 issue here.</p> <p>14 MS. MENNINGER: I don't, your Honor.</p> <p>15 THE COURT: Okay.</p> <p>16 MS. MOE: I just want to ensure any questions about</p> <p>17 this are framed as Jane's knowledge about the litigation and</p> <p>18 not asking for her to testify about documents that aren't in</p> <p>19 evidence, that she may not have seen, that are prepared by</p> <p>20 attorneys. In order to avoid confusion, we want to make sure</p> <p>21 that any questions about civil litigation are about what she</p> <p>22 knows or doesn't know. I want to avoid a scenario in which a</p> <p>23 lay witness is shown legal documents and asked to read them</p> <p>24 into the record or testify to them beyond the scope of her</p> <p>25 knowledge.</p>

LC1VMAX3	Jane - cross	Page 483	LC1VMAX3	Jane - cross	Page 485
1	THE COURT: So that's not a 408 issue, it's a scope of		1	attorney's letter to my law firm in which he's demanding that	
2	knowledge issue.		2	and the date of the letter. If she wants to say she doesn't	
3	MS. MOE: Yes, your Honor.		3	know what her civil attorney is doing acting on her behalf, I	
4	It's a 408 issue to the extent the questions are about		4	guess she could say that.	
5	negotiations related to settlements which would only be		5	THE COURT: Okay. So if it doesn't refresh her	
6	admissible in order to show bias under the second prong of the		6	recollection, we move on. And then if the answer is no, what	
7	rule. And that's where the scope of knowledge issue comes into		7	then?	
8	play, because facts along those lines would only be relevant		8	MS. MENNINGER: Well, your Honor, that leads to a	
9	under Rule 408 if this witness were aware of them. So we just		9	potential scenario with her attorney being a witness. But I	
10	wanted to make sure any examination was cabined along those		10	think we would cross that bridge on another day.	
11	lines.		11	MS. MOE: Yes, your Honor.	
12	THE COURT: Ms. Menninger?		12	The question remains about her knowledge. And again,	
13	MS. MENNINGER: Your Honor, in those two documents,		13	if we're refreshing this witness's recollection with a document	
14	the attorney in a civil matter for this witness demanded sums		14	she hasn't seen, I just want to make sure that the question is	
15	of money. And there was one in the civil case. He was acting		15	very precisely framed. Because there have been a number of	
16	in his capacity, and she was a party in that case, and he was		16	times already this morning where the witness has been asked to	
17	her lawyer. So his statements are adoptive admissions by the		17	just read the document and has given answers like, I don't	
18	party from that case that she was demanding the money that's		18	know, but I guess that's what this says, which is beyond the	
19	claimed in that letter. That's the first one.		19	scope of refreshing a recollection. So I just want to ensure	
20	THE COURT: And so what do you expect to do? You		20	we're not asking this witness to read into the record hearsay	
21	expect to ask what?		21	statements of her attorney which she doesn't have knowledge.	
22	MS. MENNINGER: You were demanding \$25 million to		22	THE COURT: If she says, I don't know, you can try to	
23	settle your civil law claim while Ms. Maxwell was pending in		23	refresh her recollection. The question is, Does this refresh	
24	this criminal case, I might add. That's the first one.		24	your recollection? If the answer is no, we move on. And then	
25	THE COURT: Okay. So the question is, Were you		25	you do --	
LC1VMAX3	Jane - cross	Page 484	LC1VMAX3	Jane - cross	Page 486
1	demanding \$25 million in civil litigation while this criminal		1	MS. MENNINGER: We cross bridges that --	
2	case was pending?		2	THE COURT: Right.	
3	MS. MENNINGER: Yes, your Honor.		3	And if the answer is -- so she says no. And you show	
4	THE COURT: Okay.		4	it to her and ask if that refreshes her recollection. And if	
5	MS. MOE: Yes, your Honor.		5	the answer is no, we move on.	
6	As long as it's framed in terms of her knowledge; we		6	MS. MENNINGER: The second one, your Honor, is in the	
7	have no objection to what she knows about or was involved in.		7	victims' compensation program. As your Honor may have seen,	
8	What we want to avoid is a scenario where following a		8	she was offered an award. And after that award was offered,	
9	question like that, a legal document exchanged between		9	her lawyer -- the same lawyer in that proceeding -- wrote	
10	attorneys was then shown to the witness to refresh her		10	basically a motion for reconsideration and said that the award	
11	recollection, and this witness was asked to read into the		11	was not appropriate; that it should at least be an eight-figure	
12	record comments her attorney made, which would not be		12	award. So that delayed the whole -- you know, her decision to	
13	admissible under Rule 408 if she doesn't know about them		13	join in the -- or to accept the award. And I believe that is,	
14	because they can't speak to her bias if she is not aware of		14	again, an adoptive admission or a statement because he was	
15	those communications.		15	acting in her capacity as her lawyer in a civil case while this	
16	THE COURT: So just to spin out the question, Were you		16	criminal case was pending.	
17	demanding \$25 million during -- in a civil lawsuit while this		17	THE COURT: So what's the question you'll ask.	
18	criminal investigation was pending?		18	MS. MENNINGER: They are the same, your Honor. It's	
19	I suppose one response would be I don't know, one		19	essentially, Didn't you get offered an award of \$5 million and	
20	response is yes, and one response is no.		20	felt that that was not sufficient? And your attorney, on your	
21	So if the response is yes, you move on?		21	behalf, went back to the claims program and asked for an	
22	MS. MENNINGER: Yes.		22	eight-figure settlement instead.	
23	THE COURT: If the response is I don't know, what do		23	MS. MOE: Yes, your Honor.	
24	you do?		24	Again, the substance of that testimony would only be	
25	MS. MENNINGER: Refresh her recollection with her own		25	relevant under Rule 408. If this witness knows about it and,	

<p>LC1VMAX3 Jane - cross Page 487</p> <p>1 thus, it's offered about her particular bias --</p> <p>2 THE COURT: Well, you heard the question.</p> <p>3 MS. MOE: Yes, your Honor.</p> <p>4 THE COURT: Do you object to the question?</p> <p>5 MS. MOE: We do object to the question. If the</p> <p>6 question is, Did you seek an increased amount in the settlement</p> <p>7 award, I have no objection to that. If the question is, Isn't</p> <p>8 it true your attorney made the following statement, that</p> <p>9 question is objectionable.</p> <p>10 THE COURT: Under 408.</p> <p>11 MS. MOE: Yes, your Honor.</p> <p>12 MS. MENNINGER: Your Honor, it goes to bias, her</p> <p>13 motive to testify in this case, and her bias against my client.</p> <p>14 THE COURT: Let's start with a more basic issue which</p> <p>15 no one has briefed, but Manko v. United States, are you</p> <p>16 familiar?</p> <p>17 MS. MOE: I'm not, your Honor.</p> <p>18 THE COURT: 87 F.3d 50 (2d Cir. 1996).</p> <p>19 I'll quote: "the policy that underlies Rule 408 does</p> <p>20 not apply to criminal prosecutions. The policy favoring the</p> <p>21 encouragement of civil settlements sufficient to bar their</p> <p>22 admission in civil actions is insufficient, in our view, to</p> <p>23 outweigh the need for accurate determinations in criminal cases</p> <p>24 where the stakes are higher."</p> <p>25 Is that good law?</p>	<p>LC1VMAX3 Jane - cross Page 489</p> <p>1 we're talking about is impeachment. And so a statement or an</p> <p>2 issue of bias that's being offered for impeachment, whether</p> <p>3 we're talking about a Rule 408 issue or otherwise, is only</p> <p>4 relevant and permissible if this witness knows about it.</p> <p>5 THE COURT: I agree there are personal knowledge</p> <p>6 questions in issue. I did ask you specifically if it was a 408</p> <p>7 issue, and you said yes. You're on your feet, of course, now,</p> <p>8 and have to respond to me quoting a Second Circuit decision at</p> <p>9 you. And, of course, district courts are required to follow</p> <p>10 Second Circuit precedent even if its intention was subsequent</p> <p>11 changes in the law, unless and until the case is reconsidered</p> <p>12 by the Second Circuit sitting en banc or its equivalent or is</p> <p>13 rejected by a later Supreme Court decision.</p> <p>14 So I do think there may be a question of the change in</p> <p>15 the rule and what the scope of that was and whether it</p> <p>16 overturns the Second Circuit decision such that I'm not bound</p> <p>17 by it. I doubt it. Separate and apart from that is the</p> <p>18 question of whether she has personal knowledge of what her</p> <p>19 attorneys did, right.</p> <p>20 MS. MOE: Yes, your Honor.</p> <p>21 THE COURT: It's not a 408 issue, it's a foundation</p> <p>22 question, personal knowledge question.</p> <p>23 Ms. Menninger made an argument that in the civil</p> <p>24 litigation context, she could be assumed to have adopted the</p> <p>25 position of her attorneys. I think we do get to that bridge,</p>
<p>LC1VMAX3 Jane - cross Page 488</p> <p>1 MS. MOE: Your Honor, I'm not -- I take the Court at</p> <p>2 its word. I'm not familiar --</p> <p>3 THE COURT: I mean, that's what it says. I'll admit</p> <p>4 there may be some complications, but I'd like to know the</p> <p>5 government's position on that.</p> <p>6 MS. MOE: Yes, your Honor. We'd be happy to take a</p> <p>7 quick look into it.</p> <p>8 THE COURT: It will probably take more than a quick</p> <p>9 look. It's complicated. That case is in the context of the</p> <p>10 defense seeking to introduce civil litigation settlement. Is</p> <p>11 defense aware of this case? Anybody have knowledge? No.</p> <p>12 Who reads Second Circuit cases?</p> <p>13 In the context of the defense seeking to introduce,</p> <p>14 the rule was subsequently amended, there's been no intervening</p> <p>15 Second Circuit interpretation. The rule is amended because the</p> <p>16 government wanted some ability to introduce in some context</p> <p>17 civil settlement matters. So the rule has been changed now, by</p> <p>18 its terms, at least, not in the case of motive and bias, it</p> <p>19 does appear to apply in criminal settings. But I don't think</p> <p>20 that the amendment, which was not -- I don't think that</p> <p>21 amendment is sufficiently overruling of the Second Circuit</p> <p>22 decision for me not to be bound by that Second Circuit</p> <p>23 decision. But you'll, I'm sure, take a look at that issue.</p> <p>24 MS. MOE: Yes, your Honor.</p> <p>25 And just to widen the aperture of the issue, what</p>	<p>LC1VMAX3 Jane - cross Page 490</p> <p>1 if we need to cross it, so let's see if there's a memory -- if</p> <p>2 there's an awareness or not. And if she doesn't know and the</p> <p>3 answer is no, I think we'll move on until I hear from you as to</p> <p>4 how it might come in.</p> <p>5 MS. MOE: Thank you, your Honor.</p> <p>6 And we'll look into the Rule 408 issue. If we have</p> <p>7 that wrong, we'll certainly withdraw that objection. And I</p> <p>8 appreciate the Court flagging that.</p> <p>9 THE COURT: I assume that's why you hadn't raised 408</p> <p>10 in your motion to quash. In any event, one of the parties</p> <p>11 raised 408, so we looked at it and that was as far as we got.</p> <p>12 Anything else?</p> <p>13 MS. MOE: Yes, your Honor.</p> <p>14 There was just that brief anonymity.</p> <p>15 THE COURT: Oh, yes. Let's do that at sidebar.</p> <p>16 MS. MOE: Thank you, your Honor.</p> <p>17 (Pages 491 to 495 SEALED)</p> <p>18 (Continued on next page)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p>LC1VMAX3 Jane - cross Page 496</p> <p>1 (In open court) 2 THE COURT: Five minutes. 3 (Recess) 4 THE COURT: Matters to take up? 5 MS. MOE: Not from the government, your Honor. 6 MS. MENNINGER: No. Thank you, your Honor. 7 THE COURT: We can bring the witness. 8 And Ms. Williams can bring in the jury. 9 Mr. Everdell, did you get the binders squared away for 10 the jurors? 11 MR. EVERDELL: Your Honor, I did look, and the one 12 juror referenced the letter of recommendation. And those, I 13 think, would have been with the Interlochen applications. And 14 I looked at all of those in both binders, and they look to be 15 complete. I just think that he or she may have missed the 16 page. 17 THE COURT: Okay. All right. 18 So maybe we'll take -- really make sure we're taking 19 time to direct them -- 20 (Jury present) 21 THE COURT: All right. We will resume, Ms. Menninger, 22 with your cross-examination of witness Jane. 23 And Jane, I remind you, you are under oath. 24 Go ahead, Ms. Menninger. 25 MS. MENNINGER: Thank you, your Honor.</p>	<p>LC1VMAX3 Jane - cross Page 498</p> <p>1 A. Yes. And with all due respect, I didn't write any of this 2 and I've never read this document because this is incorrect. 3 Q. So you're denying that you made the statement your first 4 experience of abuse was when you were 14 years old in New York, 5 you met Epstein to take headshots, and that is when he 6 masturbated? 7 A. Yeah, this is incorrect. 8 Q. When you first talked to the government in December of 2019 9 about traveling to New York, you told them that on your first 10 trip nothing inappropriate happened; correct? 11 A. I don't recall. 12 Q. You told the government that your first trip was to just go 13 and have fun; correct? 14 A. I don't recall. 15 Q. If I could direct your attention to your statement from 16 September of 2019, which is 001, at the second page. 17 MS. MOE: And I'd object to characterizing it as her 18 statement. 19 THE COURT: Sustained. 20 MS. MENNINGER: I'm sorry, what? I didn't hear it. 21 MS. MOE: I'd object to characterizing this as her 22 statement. I think the witness has been very clear these are 23 not her statements. 24 MS. MENNINGER: I didn't hear it. I apologize, your 25 Honor.</p>
<p>LC1VMAX3 Jane - cross Page 497</p> <p>1 BY MS. MENNINGER: 2 Q. Yesterday you testified about the first time you were 3 abused, you claim, by Epstein. Do you recall that testimony? 4 A. Yes. 5 Q. You said that it occurred in a pool house in Florida; 6 correct? 7 A. Correct. 8 Q. His Palm Beach home; correct? 9 A. Correct. 10 Q. The Palm Beach home that you went to, you say, for all 11 three years; correct? Fourteen through 16. 12 A. Correct. 13 Q. And the very first time that you were abused would be a 14 very important part of your story, you would agree; correct? 15 A. Correct. 16 Q. But when you talked to the government in December of 2019, 17 isn't it true that you told them that the first time you were 18 abused was in New York? 19 A. That is not correct. 20 Q. Isn't it true that you said you were in New York and you 21 were abused when you went up there to take headshots? 22 A. I don't recall. 23 Q. If I could direct your attention to 3509-005 on the second 24 page. It's going to be the second paragraph up from the 25 bottom.</p>	<p>LC1VMAX3 Jane - cross Page 499</p> <p>1 THE COURT: I sustain. 2 Q. You spoke with the government in September of 2019; 3 correct? 4 A. Correct. 5 MS. MENNINGER: I apologize. I may be on the wrong 6 page. I'll find that in a minute. And I apologize. 7 Q. If I can direct your attention to a discussion you had with 8 the government in February of 2020, where you told them that 9 the first trip to New York was just to go and have fun. Is 10 that true? 11 A. I don't recall. 12 Q. Okay. If I could have you take a look at 008 on page 8. 13 And it's going to be in the fourth full paragraph. 14 Does that refresh your recollection about what you 15 told the government in February 2020 about your first trip to 16 New York? 17 A. Like I said, with all due respect, I didn't write any of 18 this. I've never read this before. And I was never recorded. 19 This was just somebody jotting down notes, and so a lot of this 20 is out of sequence and incorrect. 21 Q. Does that refresh your recollection about what you told the 22 government about your first trip to New York? 23 A. No. 24 MS. MOE: Asked and answered, your Honor. 25 THE COURT: The answer is no.</p>

<p>LC1VMAX3 Jane - cross Page 500</p> <p>1 You may proceed.</p> <p>2 Q. Isn't it true you told the government on that occasion that</p> <p>3 your first trip to New York was just to go and have fun?</p> <p>4 MS. MOE: Asked and answered, your Honor.</p> <p>5 THE COURT: Sustained.</p> <p>6 A. No.</p> <p>7 THE COURT: I sustained. If I sustain, pause. And</p> <p>8 then if I overrule, you can answer.</p> <p>9 Go ahead, Ms. Menninger.</p> <p>10 BY MS. MENNINGER:</p> <p>11 Q. And it was later when you were talking to the government in</p> <p>12 April of 2020 that you said you only specifically recalled one</p> <p>13 incident in New York where Ghislaine was present; correct?</p> <p>14 A. I don't recall.</p> <p>15 Q. If I could have you take a look at 3509-004. Okay. I'm</p> <p>16 sorry, 3509-003. Excuse me. And it's on the second page in</p> <p>17 the second full paragraph. If you could look at that second</p> <p>18 sentence in the second paragraph regarding how many incidents</p> <p>19 in New York.</p> <p>20 MS. MOE: And, your Honor, is the question whether</p> <p>21 that refreshes her recollection or --</p> <p>22 MS. MENNINGER: Right. I'm having her take a look at</p> <p>23 it.</p> <p>24 Q. And does that refresh your recollection?</p> <p>25 A. What page is this?</p>	<p>LC1VMAX3 Jane - cross Page 502</p> <p>1 witness.</p> <p>2 THE COURT: You've asked already do you recall having</p> <p>3 made that statement and the answer, I think, is yes?</p> <p>4 THE WITNESS: Yeah, for at least --</p> <p>5 THE COURT: Okay.</p> <p>6 Q. You recall at least one incident in New York?</p> <p>7 THE COURT: Are you asking that as a question of her</p> <p>8 memory now or are you asking her if she remembers relaying that</p> <p>9 to the FBI?</p> <p>10 Q. Yes, do you remember that now?</p> <p>11 A. Yes.</p> <p>12 Q. Okay.</p> <p>13 MS. MOE: Your Honor, which was that about, her memory</p> <p>14 or whether it happened?</p> <p>15 THE COURT: It was rephrased as about her memory now.</p> <p>16 Next question, Ms. Menninger.</p> <p>17 Q. That was a conversation you had in November of 2019 with</p> <p>18 the government; correct?</p> <p>19 A. Correct.</p> <p>20 Q. And then by April of 2020, you reported to the government</p> <p>21 that you were abused 90 percent of the time you traveled with</p> <p>22 Epstein and Maxwell; correct?</p> <p>23 MS. MOE: Objection, your Honor.</p> <p>24 THE COURT: Overruled.</p> <p>25 A. Correct.</p>
<p>LC1VMAX3 Jane - cross Page 501</p> <p>1 Q. On page 2. 3509-03, page 2.</p> <p>2 A. What is the question?</p> <p>3 Q. Do you recall -- does this refresh your recollection about</p> <p>4 how many incidents in New York you recall with Ghislaine</p> <p>5 present?</p> <p>6 A. I don't think I have the correct page.</p> <p>7 THE COURT: You're directing to the second full</p> <p>8 paragraph, second sentence?</p> <p>9 MS. MENNINGER: Yes, your Honor, the second full</p> <p>10 paragraph on page 2. The paragraph begins with "Maxwell." The</p> <p>11 second sentence of that paragraph.</p> <p>12 MS. MOE: I also object as mischaracterizing.</p> <p>13 THE COURT: Sustained.</p> <p>14 Q. Did you tell the government that you recall one incident in</p> <p>15 New York where Maxwell was present?</p> <p>16 MS. MOE: Same objection, your Honor.</p> <p>17 THE COURT: Sustained.</p> <p>18 A. Well, this one says --</p> <p>19 THE COURT: Just a second. Go ahead.</p> <p>20 Q. Did you tell the government you recalled at least one</p> <p>21 incident in New York where Maxwell was present?</p> <p>22 A. Yes.</p> <p>23 Q. And that's what you relayed to them on that day; correct?</p> <p>24 MS. MOE: Your Honor, again, I'd object to</p> <p>25 mischaracterizing these documents. It's very confusing for the</p>	<p>LC1VMAX3 Jane - cross Page 503</p> <p>1 Q. So you went from nothing inappropriate happened to being</p> <p>2 abused 90 percent of the time; correct?</p> <p>3 MS. MOE: Objection, your Honor. Mischaracterizes --</p> <p>4 THE COURT: Sustained.</p> <p>5 Q. Has your story changed about how many times you remember</p> <p>6 abuse over the course of your discussions with the government?</p> <p>7 A. No, and I didn't understand exactly the question.</p> <p>8 Q. In September of 2019, when you first met with the</p> <p>9 government, you told them that you flew with Ghislaine and</p> <p>10 Epstein to New York to see The Lion King; correct?</p> <p>11 A. Correct.</p> <p>12 Q. You told them that you flew to New York for the first time</p> <p>13 with them to see The Lion King; correct?</p> <p>14 A. I said that, but I was incorrect in my timeline.</p> <p>15 Q. You said that happened when you were 14, right?</p> <p>16 A. Yes.</p> <p>17 Q. And that's the trip where you said nothing inappropriate</p> <p>18 happened; correct?</p> <p>19 A. I don't recall.</p> <p>20 Q. And you were, as we've seen, a student of theater and the</p> <p>21 arts at the time; correct?</p> <p>22 A. Correct.</p> <p>23 MS. MOE: Objection to form.</p> <p>24 THE COURT: Overruled. You may answer.</p> <p>25 A. Correct.</p>



<p>LC1VMAX3 Jane - cross Page 504</p> <p>1 Q. A student of the arts would be pretty excited about their 2 first trip to see a Broadway show; correct? 3 A. Correct. 4 Q. Especially The Lion King when it came out; correct? 5 A. Correct. 6 Q. And it would also be memorable to a young person to have 7 their first trip on a private jet; correct? 8 A. Correct. But, once again, my timeline was wrong. 9 Q. Well, you told them that in September of 2019, right, when 10 you first met with them? 11 A. I did say that, yes. 12 Q. You repeated that same story in December of 2019; correct? 13 A. I don't recall. 14 Q. You repeated that story in February of 2020; correct? 15 A. I don't recall. 16 Q. All right. I'll have you take a look at 3509-005 at 6 to 17 7. I apologize. 001 at page 2. 18 THE COURT: What paragraph? 19 MS. MENNINGER: I'm having a little trouble with my 20 glasses. Just a moment, your Honor. I apologize. 21 THE COURT: Okay. 22 MS. MENNINGER: Third paragraph, your Honor. Sorry. 23 THE COURT: Third full paragraph? 24 MS. MENNINGER: Yes, your Honor. 25 THE COURT: Okay.</p>	<p>LC1VMAX3 Jane - cross Page 506</p> <p>1 MS. MENNINGER: I've been provided a light by 2 Ms. Sternheim to see. 3 THE COURT: Oh, great. These courtrooms are dark. 4 (Jury present) 5 THE COURT: All right. Everyone please be seated. 6 Okay. Everybody is okay. I know it's always alarming 7 to know you have to travel in a group always, but do let us 8 know if you need anything. Thank you, everyone. 9 Ms. Menninger, you may continue with your cross. 10 MS. MENNINGER: Thank you, your Honor. 11 BY MS. MENNINGER: 12 Q. So I think we were talking about in September of 2019 you 13 agreed that you had told the government about flying to New 14 York with Maxwell and Epstein to see The Lion King; correct? 15 A. I did not say that. Incorrect. 16 Q. Okay. If I can show you 3509-001, page 2, third paragraph. 17 A. Yes, I see that. And it's incorrect. This is not a 18 transcript of mine. Nobody ever recorded me saying any of my 19 statements. And I'm reading it right now and a lot of these 20 are not correct. 21 Q. So you did not tell the government in September of 2019 22 that when you were 14 years old, you flew with Epstein and 23 Maxwell to New York City to see The Lion King? 24 A. I flew with them to New York City and I had mistaken that 25 we were going to see The Lion King, but that was a different</p>
<p>LC1VMAX3 Jane - cross Page 505</p> <p>1 MS. MOE: Your Honor, I apologize. I'm confused. 2 I think the question was about a number of different 3 meetings, but we're now looking at the same notes. I think 4 there's a confusing suggestion that we're talking about -- 5 THE COURT: Okay. 6 BY MS. MENNINGER: 7 Q. The first time that you met with the government, you told 8 them that you were flown to New York by Epstein and Maxwell to 9 see The Lion King, right? 10 MS. MOE: Objection. Asked and answered. 11 THE COURT: Just a moment. 12 Do you need a break? 13 THE DEPUTY CLERK: Yes. 14 THE COURT: Go ahead. 15 (Jury not present) 16 THE COURT: You can be seated. 17 Let me find out what's happening. 18 (Recess) 19 THE COURT: Just to be clear, it looked like a witness 20 was having a coughing issue or sickness or something. That a 21 juror, apologize. 22 (Pause) 23 THE COURT: Happy to report she's fine. She felt like 24 something was stuck in her throat. She's getting some water 25 and a cough drop and we'll resume. The juror, to be clear.</p>	<p>LC1VMAX3 Jane - cross Page 507</p> <p>1 trip. 2 Q. But you did say it, but you learned later you were wrong; 3 correct? 4 A. Yes. 5 Q. All right. So let's turn to when you learned that you were 6 wrong. Your attorney -- you repeated it a few times though, I 7 guess that's my point? 8 MS. MOE: Objection, your Honor. 9 Q. That was the only time you told the government that you 10 flew to New York to see The Lion King with Epstein and Maxwell? 11 MS. MOE: Objection, your Honor, to form. It's an 12 argument, not a question. 13 THE COURT: Overruled. 14 A. No, it's not the only time. 15 Q. You told it to them a couple times before you found out you 16 were wrong, right? 17 A. No. 18 Q. Okay. Well, let's go to your conversation in February of 19 2020, 008, page 8. And at that time you told the government 20 your first trip to New York was to just go and have fun. It 21 may have been the trip that you went to see The Lion King, 22 right? 23 MS. MOE: Objection, your Honor. It's not 24 inconsistent and, again, this is misleading. 25 THE COURT: You can --</p>

<p>LC1VMAX3 Jane - cross Page 508</p> <p>1 MS. MENNINGER: Refresh?</p> <p>2 THE COURT: Yes, you can ask if it refreshes.</p> <p>3 Q. Does reading the second sentence of the fourth paragraph</p> <p>4 refresh your recollection about what you told the government in</p> <p>5 February of 2020?</p> <p>6 A. No.</p> <p>7 Q. You don't remember saying it then?</p> <p>8 A. No.</p> <p>9 Q. Isn't it true what you said to the government in February</p> <p>10 2020 is that your first trip to New York was to just go and</p> <p>11 have fun, this may have been the trip to see The Lion King?</p> <p>12 MS. MOE: Objection. Asked and answered.</p> <p>13 THE COURT: Sustained.</p> <p>14 Q. After this meeting in February 2020, your email -- your</p> <p>15 lawyer was Mr. Glassman at the time; correct?</p> <p>16 A. Correct.</p> <p>17 Q. Mr. Glassman got an email from a prosecutor,</p> <p>18 Mr. Rossmiller; correct?</p> <p>19 MS. MOE: Objection to foundation, your Honor.</p> <p>20 MS. MENNINGER: I'm not asking the contents.</p> <p>21 THE COURT: Do you know?</p> <p>22 THE WITNESS: I don't know.</p> <p>23 THE COURT: Okay.</p> <p>24 Q. At some point did your attorney, Mr. Glassman, come to you</p> <p>25 with a question?</p>	<p>LC1VMAX3 Jane - cross Page 510</p> <p>1 The witness testified that she doesn't know, not that</p> <p>2 she doesn't remember.</p> <p>3 THE COURT: Overruled.</p> <p>4 You can ask if this refreshes. This is precisely what</p> <p>5 we talked through. You can ask if it refreshes her</p> <p>6 recollection.</p> <p>7 A. What is the question? Sorry.</p> <p>8 Q. Does this refresh your recollection about your attorney</p> <p>9 communicating with the government about The Lion King and</p> <p>10 Broadway?</p> <p>11 A. Yes, but it doesn't reference the timeline, if that was the</p> <p>12 original question. I'm sorry. I'm confused.</p> <p>13 Q. Is it true that your lawyer communicated to the government</p> <p>14 your recollection that, in fact, you had seen The Lion King</p> <p>15 Broadway show and not the movie?</p> <p>16 A. Oh, yes, I -- we did see the show.</p> <p>17 Q. And you recalled seeing the Broadway show; correct?</p> <p>18 A. Correct.</p> <p>19 Q. And you recalled sitting in the mezzanine seats; correct?</p> <p>20 A. Correct.</p> <p>21 Q. And you recalled that Epstein bragged about getting those</p> <p>22 seats because he knew the director; correct?</p> <p>23 A. Correct.</p> <p>24 Q. And your attorney communicated all of that to the</p> <p>25 government; correct?</p>
<p>LC1VMAX3 Jane - cross Page 509</p> <p>1 MS. MOE: Objection. Privileged.</p> <p>2 THE COURT: Sustained.</p> <p>3 MS. MENNINGER: Your Honor, it was communicated to the</p> <p>4 government, so the privilege had been waived.</p> <p>5 MS. MOE: Your Honor --</p> <p>6 THE COURT: He didn't ask -- I sustained.</p> <p>7 MS. MOE: Thank you, your Honor.</p> <p>8 THE COURT: The question as phrased, sustained.</p> <p>9 Q. Do you know whether your attorney ever communicated to the</p> <p>10 government an answer regarding The Lion King and Broadway?</p> <p>11 MS. MOE: No objection, your Honor.</p> <p>12 THE COURT: Good.</p> <p>13 MS. MENNINGER: I know Ms. Moe would like to come do</p> <p>14 this for me, but --</p> <p>15 MS. MOE: I do object to that, your Honor.</p> <p>16 THE COURT: All right. Everybody calm down. The</p> <p>17 question is not objected to nor objectionable. You may state</p> <p>18 it again, Ms. Menninger.</p> <p>19 BY MS. MENNINGER:</p> <p>20 Q. Do you know whether your attorney communicated to the</p> <p>21 government -- communicated with the government about your</p> <p>22 experience with The Lion King and going to New York?</p> <p>23 A. No, I don't know.</p> <p>24 Q. Could looking at 3509-10 refresh your recollection?</p> <p>25 MS. MOE: Your Honor, I object.</p>	<p>LC1VMAX3 Jane - cross Page 511</p> <p>1 A. That's correct.</p> <p>2 Q. And that was in response to a question from the government</p> <p>3 to you through your attorney; correct?</p> <p>4 A. Correct.</p> <p>5 Q. That's because the government communicated to you through</p> <p>6 your attorney that The Lion King didn't come out until 1997;</p> <p>7 correct?</p> <p>8 A. Correct.</p> <p>9 Q. So although you had told the government twice previously</p> <p>10 that you flew to New York with Maxwell and Epstein when you</p> <p>11 were 14, you learned that the Broadway show didn't come out</p> <p>12 until you were 17; correct?</p> <p>13 A. That's right. But that wasn't the first time that we'd</p> <p>14 flown.</p> <p>15 Q. The government suggested to you that perhaps you meant to</p> <p>16 say The Lion King movie through your attorney to you; correct?</p> <p>17 MS. MOE: Objection, your Honor.</p> <p>18 THE COURT: Sustained.</p> <p>19 Q. Did Mr. Glassman share with you the email that he got from</p> <p>20 the government?</p> <p>21 MS. MOE: Objection.</p> <p>22 THE COURT: Sustained.</p> <p>23 Q. You knew at the time you communicated the information to</p> <p>24 Mr. Glassman that he intended to share it with the government;</p> <p>25 correct?</p>

<p>LC1VMAX3 Jane - cross Page 512</p> <p>1 MS. MOE: Objection, your Honor. 2 THE COURT: Sustained. 3 MS. MENNINGER: Your Honor, that's how we establish a 4 waiver of the privilege. 5 MS. MOE: Objection, your Honor. 6 THE COURT: Sustained. 7 Q. When you first talked to the government about traveling to 8 New Mexico, you told them that you were ignored on that trip; 9 correct? 10 A. I don't recall. 11 Q. You recall telling the government that the first time you 12 went on a private plane to New Mexico, you were not doing much 13 and just sitting around; correct? 14 A. I don't recall. 15 Q. Okay. Look at 3509-008 at page 6, and the second full 16 paragraph, in the middle of the paragraph. Do you recall 17 telling the government that the first time you went to New 18 Mexico on Epstein's plane you were somewhat ignored? 19 A. No, I don't recall. 20 Q. Do you recall that you were told to go hiking? 21 A. I don't recall. 22 Q. Do you recall saying you were not impressed? 23 THE COURT: I need you to clarify. You're again 24 switching between asking if it's a memory now or whether she 25 remembers having said that to the government.</p>	<p>LC1VMAX3 Jane - cross Page 514</p> <p>1 A. I don't recall this. 2 Q. Then I would like to direct your attention to the last 3 sentence on that same page, where you were asked again if you 4 recalled any specific abuse that occurred in New Mexico, and 5 then turning to the next page, you stated you were not sure. 6 THE COURT: Do you have a question? 7 Q. Does that refresh your recollection now that you've seen 8 that on the page? 9 A. No, it does not. 10 Q. Isn't it true that's what you said to the government? 11 A. I don't recall saying this. 12 Q. And you also told the government that your memory of the 13 details of that location were not good; correct? 14 A. I don't recall saying that. 15 Q. Okay. If you could look at the top of the second page -- 16 I'm sorry, of page 8. Does that refresh your recollection? 17 A. No. 18 Q. Isn't it true you told the government regarding New Mexico 19 the place was dark and you do not recall many of the details of 20 this location? If there was abuse that occurred there, it 21 wouldn't have been a group thing, but she cannot recall -- you 22 cannot recall anything specific? 23 MS. MOE: Objection, your Honor. 24 THE COURT: What's the question? 25 MS. MENNINGER: Well, I asked her if it refreshed her</p>
<p>LC1VMAX3 Jane - cross Page 513</p> <p>1 Q. As you sit here today, do you remember not being impressed 2 when you went to New Mexico for the first time on the private 3 plane? 4 A. I don't recall saying that. 5 Q. No. Do you recall as you sit here today that you were not 6 impressed when you first went to New Mexico on a private plane? 7 A. No. 8 Q. You do not recall any abuse happening when you first went 9 to New Mexico; correct? 10 A. That's not correct, no. 11 Q. That's what you told the government in February of 2020; 12 correct? 13 A. No, that's not correct. Like I said, this is not a 14 transcript of mine. This is the first time I'm reading it and 15 it's not correct. 16 Q. All right. I'm going to direct your attention to 3509-008, 17 page 7, the last full paragraph. Does that refresh your 18 recollection about what you told the government about your 19 first trip to New Mexico? 20 A. No, it doesn't. 21 Q. And isn't it true you told the government in February of 22 2020 that on your first trip to New Mexico, you recalled going 23 hiking, remembered not doing too much, just sitting around 24 mostly, and did not recall specific abuse that may have 25 occurred?</p>	<p>LC1VMAX3 Jane - cross Page 515</p> <p>1 recollection, she said it did not. Now I'm asking her if she 2 made the statement, and we haven't heard her answer yet. 3 THE COURT: So the question is did you make the 4 statement? 5 MS. MENNINGER: Yes. 6 THE COURT: Okay. You may answer that. 7 A. No, I don't recall making these statements. 8 Q. Then you were asked the same question by the government in 9 the same interview a third time; correct? 10 A. I don't know. 11 Q. I'm going to ask you to take a look at page 11, the top 12 paragraph, the first sentence. Does that refresh your 13 recollection about you being asked a third time in the same 14 interview about abuse occurring in New Mexico? 15 A. No, it does not. 16 Q. Isn't it true what you told the government a third time was 17 that you were asked about the New Mexico trips you took and if 18 you recalled any specific abuse that occurred there, to which 19 you answered you did not remember; correct? 20 MS. MOE: Objection. 21 THE COURT: Sustained. 22 Q. It didn't refresh your recollection -- 23 THE COURT: You said isn't it true that you told the 24 government a third time that you were asked about the New 25 Mexico trips. I think you lost the thread.</p>

<p>LC1VMAX3 Jane - cross Page 516</p> <p>1 MS. MENNINGER: Okay.</p> <p>2 Q. Isn't it true you told the government you do not remember</p> <p>3 any specific abuse that occurred in New Mexico on the trips</p> <p>4 that you took there?</p> <p>5 A. I don't recall.</p> <p>6 Q. And yesterday you testified about an incident in New Mexico</p> <p>7 that you now specifically remember two years later.</p> <p>8 A. That's right.</p> <p>9 Q. Today you remember it; in 2020 you did not.</p> <p>10 A. I don't recall saying any of what's written here.</p> <p>11 Q. I'm going to ask you about the homes that you testified you</p> <p>12 visited for Epstein in the mid 1990s, okay, between the ages of</p> <p>13 14 and 16.</p> <p>14 You recall in Palm Beach that you went to a pool</p> <p>15 house; correct?</p> <p>16 A. That's correct.</p> <p>17 Q. And you only went to one house for Epstein in Palm Beach</p> <p>18 ever; correct?</p> <p>19 A. Yes.</p> <p>20 Q. You remember the whole house in Florida was light-colored</p> <p>21 and beachy; correct?</p> <p>22 A. I think so; correct.</p> <p>23 Q. You remember a winding staircase with pictures on the wall;</p> <p>24 correct?</p> <p>25 A. Correct.</p>	<p>LC1VMAX3 Jane - cross Page 518</p> <p>1 A. I don't know.</p> <p>2 Q. And you started staying there at the age of 14, right?</p> <p>3 A. Yes.</p> <p>4 Q. You recall a massage table being black in that home;</p> <p>5 correct?</p> <p>6 A. Correct.</p> <p>7 Q. And then you remember going to New Mexico where there was a</p> <p>8 giant ranch; correct?</p> <p>9 A. Correct.</p> <p>10 Q. An impressive, huge house, right?</p> <p>11 A. Like all of them.</p> <p>12 Q. What's that?</p> <p>13 A. I said like all of the homes, yes.</p> <p>14 Q. Right. And there were other guests around in New Mexico;</p> <p>15 correct?</p> <p>16 A. No.</p> <p>17 Q. Do you remember telling the government that Jeffrey's</p> <p>18 brother Mark Epstein went with you on a trip to New Mexico?</p> <p>19 A. I don't recall saying that.</p> <p>20 Q. Do you remember telling the government that Chef Adam Perry</p> <p>21 Ling went on a trip to New Mexico with you?</p> <p>22 A. I don't recall.</p> <p>23 Q. And you don't remember a massage room in the New Mexico</p> <p>24 home; correct?</p> <p>25 A. I don't recall.</p>
<p>LC1VMAX3 Jane - cross Page 517</p> <p>1 Q. You recall a massage room that was attached to the</p> <p>2 bathroom; correct?</p> <p>3 A. That's my memory, yes.</p> <p>4 Q. And that's the description that you gave the government;</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. In New York, you described an eight-story mansion on the</p> <p>8 Upper East Side; correct?</p> <p>9 A. Yes.</p> <p>10 Q. You started staying there when you were 14; correct?</p> <p>11 A. Correct.</p> <p>12 Q. That's the only home in New York that you visited of</p> <p>13 Epstein's; correct?</p> <p>14 A. No.</p> <p>15 Q. You stayed in some apartments where he did not live;</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. And you stayed in this eight-story mansion beginning at the</p> <p>19 age of 14; correct?</p> <p>20 A. Correct.</p> <p>21 Q. And you stayed on the eighth floor of this mansion, right?</p> <p>22 A. I believe so.</p> <p>23 Q. And Ghislaine didn't live in that mansion, right?</p> <p>24 A. I don't know.</p> <p>25 Q. You didn't see her living there; correct?</p>	<p>LC1VMAX3 Jane - cross Page 519</p> <p>1 Q. In your time with Epstein, you never saw any other underage</p> <p>2 girls around him; correct?</p> <p>3 A. I wouldn't know that, if they were.</p> <p>4 Q. Well, you told the government in 2019 that you thought you</p> <p>5 were the only one; correct?</p> <p>6 A. Correct.</p> <p>7 Q. And you only learned otherwise, you said, when you saw the</p> <p>8 news about Mr. Epstein's arrest in 2007 or 8; correct?</p> <p>9 A. Correct.</p> <p>10 Q. So none of the other participants in these orgies, I think</p> <p>11 you called them, were underage; correct?</p> <p>12 A. I wouldn't know that.</p> <p>13 Q. That you thought you were the only one, right?</p> <p>14 A. Yes.</p> <p>15 Q. And you were never asked to go recruit other girls for</p> <p>16 Epstein; correct?</p> <p>17 A. Correct.</p> <p>18 Q. You were not asked to have sexual contact with any of</p> <p>19 Epstein's friends?</p> <p>20 A. No.</p> <p>21 Q. Epstein did introduce you to a number of people associated</p> <p>22 with the arts, right?</p> <p>23 A. Not really, no.</p> <p>24 Q. He introduced you to the dean of Interlochen at a cocktail</p> <p>25 party, right?</p>

LC1VMAX3	Jane - cross	Page 520	LC1Qmax4	Jane - Cross	Page 522
1 A. I don't remember. Maybe.			1 Q. If I could direct your attention to your conversation to		
2 Q. Well, in December of 2019, you told the government that he			2 the statement 3509-001?		
3 had introduced you to the dean of Interlochen at a cocktail			3 MS. MOE: I object to characterizing it as a		
4 party.			4 statement, your Honor.		
5 THE COURT: Having a hard time hearing you,			5 THE COURT: Sustained.		
6 Ms. Menninger.			6 Q. Page 3 of 001, in the second full paragraph, does that		
7 MS. MENNINGER: I'm sorry.			7 refresh your recollection that you described a period in the		
8 Q. In 2019 December, you told the government that you had been			8 beginning before the pool house incident?		
9 introduced to the dean of Interlochen by Epstein at a cocktail			9 A. I don't recall saying that.		
10 party.			10 Q. Do you recall telling the government that Epstein took you		
11 A. I don't recall.			11 -- that Epstein told you that he had famous friends that he		
12 Q. If I could have you look at 3509-005, page 5, the second			12 would call and put on speaker phone?		
13 full paragraph. Does that refresh your recollection?			13 A. That's correct.		
14 A. I remember the dean of admissions for Julliard. I don't			14 Q. And you told them that he took you in a dark green car to.		
15 remember saying the first sentence.			15 Mar-a-Lago to meet Donald Trump, right?		
16 Q. Isn't it true you told the government that on one occasion			16 A. Right.		
17 the dean of Interlochen was there for a cocktail party, you met			17 Q. And that was in the beginning before the pool house		
18 him through Epstein?			18 incident?		
19 A. I don't remember.			19 MS. MOE: Objection. Asked and answered and also		
20 Q. You don't remember if you did meet the dean of Interlochen			20 misleading.		
21 through Epstein?			21 THE COURT: Overruled. I'll allow it.		
22 A. No.			22 A. I don't remember saying that and I don't remember the		
23 Q. And you do remember meeting the dean of admissions for			23 timeline of that.		
24 Julliard; correct?			24 Q. Yesterday you talked about group sexualized massages,		
25 A. Yes.			25 right?		
LC1VMAX3	Jane - cross	Page 521	LC1Qmax4	Jane - Cross	Page 523
1 Q. Through Epstein, right?			1 A. Yes.		
2 A. Yes.			2 Q. I think you called them orgies, right?		
3 Q. And you applied to Julliard; correct?			3 A. Yes.		
4 A. No, I did not.			4 Q. You talked about how those would happen almost every visit		
5 Q. You were referred to the Professional Children's School by			5 with him, which would have been every two weeks, correct?		
6 the dean of Julliard -- or, excuse me, the dean of admissions			6 MS. MOE: Objection to mischaracterizing the		
7 for Julliard; correct?			7 testimony.		
8 A. I don't remember who referred.			8 THE COURT: Overruled. Overruled.		
9 Q. Mr. Epstein introduced you to Donald Trump; correct?			9 A. Not correct. No.		
10 A. Correct.			10 Q. Your testimony yesterday --		
11 Q. He took you to Mar-a-Lago, right?			11 THE COURT: Where am I looking?		
12 A. Right.			12 MS. MENNINGER: Your Honor, the transcript from		
13 Q. When you were 14, you claim?			13 yesterday's testimony began on page 314 and the specific		
14 A. Yes.			14 statement about frequency is at the top of 315.		
15 Q. He took you in a dark green car?			15 MS. MOE: Your Honor, may I have just a moment?		
16 A. Yes.			16 THE COURT: Yes. I need one too.		
17 Q. And you met Donald Trump there; correct?			17 Can I get the page again, please.		
18 A. Correct.			18 MS. MENNINGER: Sure. Your Honor, it began -- the		
19 Q. That was before the pool house incident; correct?			19 description of the topic was on 314, and then the specific		
20 A. I don't remember that.			20 question about frequency occurred at the top of 315.		
21 (Continued on next page)			21 THE COURT: Okay.		
22			22 MS. MOE: I'm sorry, your Honor. What's the question?		
23			23 THE COURT: What's the question?		
24			24 BY MS. MENNINGER:		
25			25 Q. I asked, you testified yesterday that these group massages		

<p>LC1Qmax4 Jane - Cross Page 524</p> <p>1 would happen almost every visit with him which would have been 2 every two weeks. That was your testimony yesterday? 3 A. Yes, I guess, I -- yes, I said that. 4 Q. In these group massages, there were other participants, 5 correct? 6 A. Correct. 7 Q. You distinctly remembered the names of some of these other 8 women participants, correct? 9 A. Correct. 10 Q. You told those names to the government, correct? 11 A. Correct. 12 Q. You recalled a woman named Sophie who participated in these 13 group sexualized massages, correct? 14 A. Correct. 15 Q. She was an actual massage therapist, right? 16 A. That's what she said, yeah. 17 Q. She had blond hair? 18 A. Mmm-hmm. Yes. 19 Q. Tall and thin, right? 20 A. Yes. 21 Q. Nice legs? 22 A. Yes. 23 Q. Was pretty? 24 A. Yes. 25 Q. Had a tan?</p>	<p>LC1Qmax4 Jane - Cross Page 526</p> <p>1 A. What's the exact question joined in with Sophie? 2 Q. Those were your words. 3 A. Yes. 4 Q. You said she joined in with Sophie? 5 A. Joined into the group scenario, yes. 6 Q. She knew the routine? 7 A. Yes. 8 Q. So she could also confirm your story, right? 9 A. Yes. 10 Q. You talked about a third woman named Emmy, who was a 11 participant in the abuse, correct? 12 A. Correct. 13 Q. You said that Emmy was British? 14 A. Yes. 15 Q. And she was nice and cool, right? 16 A. Yes. 17 Q. And she was involved in the sexual contact, right? 18 A. Yes. 19 Q. And she was in these group sexualized massages with you, 20 correct? 21 A. Yes. 22 Q. There was a fourth woman you remembered named Michelle? 23 A. Yes. 24 Q. Michelle was short? 25 A. Yes.</p>
<p>LC1Qmax4 Jane - Cross Page 525</p> <p>1 A. Yes. 2 Q. Right? 3 A. Yes. 4 Q. Lived in Florida? 5 A. Yes. 6 Q. Married a racecar driver? 7 A. Yes. 8 Q. She joined in the sexual massages, correct? 9 A. Correct. 10 Q. You said she knew the routine, right? 11 A. Right. 12 Q. She would make out with other girls during these 13 encounters? 14 A. Yes. 15 Q. And you remember being on flights with Sophie? 16 A. Yes. 17 Q. Sophie would be someone who could corroborate your 18 recollection about these group massages, correct? 19 MS. MOE: Objection. 20 THE COURT: Overruled. 21 A. Yes. 22 Q. You told the government about a woman named Eva who joined 23 in, correct? 24 A. Correct. 25 Q. You said she joined in with Sophie, right?</p>	<p>LC1Qmax4 Jane - Cross Page 527</p> <p>1 Q. You hung out with her and Emmy? 2 A. Yes. 3 Q. And you sometimes went out with them, right? 4 A. Yes. 5 Q. And you claimed that Michelle was also involved in the 6 sexual contact, correct? 7 A. Yes. 8 Q. And the group massages? 9 A. Yes. 10 Q. And then another person you remembered was named Kelly, 11 right? 12 A. Yes. 13 Q. And you remembered her last name, right? 14 A. Yes. 15 Q. And you thought she was a model who was older than you, 16 right? 17 A. Yes. 18 Q. And you told the government she could back up what you were 19 talking about, right? 20 A. Yes. 21 Q. You also told the agents and the prosecutors you were 22 meeting with, you thought you could recognize these people if 23 you saw pictures, right? 24 A. A few of them, yes. 25 Q. And you said that at your very first meeting in September</p>

LC1Qmax4	Jane - Cross	Page 528	LC1Qmax4	Jane - Cross	Page 530
1	of 2019, right?		1	(In open court)	
2	A. Yes.		2	THE COURT: Do you need the question repeated? Repeat	
3	Q. And between September of 2019 and today, you've never been		3	the question.	
4	shown pictures of Sophie, right?		4	Q. Between September of 2019 and today, have you ever been	
5	MS. MOE: Objection.		5	shown photographs of Sophie by the government?	
6	MS. MENNINGER: Lack of evidence your Honor?		6	A. No.	
7	THE COURT: What are the grounds? One word grounds		7	Q. Of Emmy?	
8	for the objection.		8	A. No.	
9	MS. MOE: Your Honor, may we approach?		9	Q. Michelle?	
10	THE COURT: Okay.		10	A. No.	
11	(Continued on next page)		11	Q. Eva?	
12			12	A. No.	
13			13	Q. Kelly?	
14			14	A. No.	
15			15	Q. Any of the other model-types that you said you saw in these	
16			16	group massages?	
17			17	A. No.	
18			18	Q. You remembered being on flights with a number of	
19			19	individuals, correct?	
20			20	A. Correct.	
21			21	Q. You remember Prince Andrew being on a flight, right?	
22			22	A. Yes.	
23			23	Q. You remember Mark Epstein, Jeffrey's brother, being on a	
24			24	flight?	
25			25	A. Yes.	
LC1Qmax4	Jane - Cross	Page 529	LC1Qmax4	Jane - Cross	Page 531
1	(At the sidebar)		1	Q. You recall Adam Perry Lang being on a flight with you?	
2	THE COURT: What are the grounds?		2	A. Yes.	
3	MS. MOE: Your Honor, in connection with our motions		3	Q. You remember Epstein's mom being on a flight with you?	
4	in limine, the Court granted a motion in limine from the		4	A. Yes.	
5	government about efforts to put at issue particular		5	Q. You told the government you remembered all these people	
6	investigative techniques of whether we're showing photographs		6	being on flights with you?	
7	or steps that the government is taking. That's the objection,		7	A. Yeah.	
8	your Honor.		8	Q. Were you aware of whether the flight logs reflect any	
9	THE COURT: Overruled.		9	flights by you with those individuals?	
10	MS. MENNINGER: Your Honor, can I make a record about		10	A. I have no idea, no.	
11	the number of objections because it's --		11	Q. You also had some recollections about flying on the private	
12	THE COURT: Well, the record is clear about the number		12	plane with Epstein, right? You recall being on the plane?	
13	of objections.		13	A. Yes.	
14	(Continued on next page)		14	Q. And you said that you were asked your weight when you were	
15			15	boarding the plane, correct?	
16			16	A. Yes.	
17			17	Q. And you also remember this Latin American driver for	
18			18	Mr. Epstein driving you up to the airport, correct?	
19			19	A. Correct.	
20			20	Q. So he could back up that story too, correct?	
21			21	A. Correct.	
22			22	Q. And you remember someone from Epstein's office named Lesley	
23			23	who called to set up travel arrangements for you, right?	
24			24	A. Yes.	
25			25	Q. And you recall Lesley calling your home phone in Florida,	

LC1Qmax4	Jane - Cross	Page 532	LC1Qmax4	Jane - Cross	Page 534
1	right?		1	A. Yes.	
2	A. That's what I remember, yeah.		2	Q. \$2- or \$300 at a time?	
3	Q. When you were 14, 15 and 16, right?		3	A. Yes.	
4	A. I don't know if it was her every time. I just remember a		4	Q. And that happened regardless of whether or not you were in	
5	Lesley.		5	what you claim was a sexually abusive relationship at that	
6	Q. When you were in Florida?		6	time, right?	
7	A. Yes.		7	A. Yes.	
8	Q. Between the ages of 14 to 16. And you remember Emmy		8	Q. And your brothers never mentioned anything weird about you	
9	calling your house when you were age 14, 15 and 16 to make		9	having hundreds of dollars of cash, correct?	
10	arrangements, right?		10	A. I never mentioned it to them.	
11	A. No, Emmy wasn't around then.		11	Q. And your mother as well didn't know you had hundreds of	
12	Q. Well, you told the government that you do recall Emmy		12	dollars?	
13	calling your home phone in Florida, right?		13	A. No. I gave it to my mother.	
14	A. No, I never said that.		14	Q. You gave the hundreds of dollars to your mother?	
15	Q. Let's look at 3509-001 at page 2, in the second full		15	A. Yes.	
16	paragraph.		16	Q. Every time?	
17	A. Yeah, but that's not correct.		17	A. I showed it to her every time.	
18	Q. So it says that you recall Emmy calling your house phone,		18	Q. And Epstein only gave you gifts. He didn't give any gifts	
19	correct?		19	to your brothers?	
20	MS. MOE: Objection.		20	A. He may have. I don't recall.	
21	THE COURT: Just a moment. Just a moment. Sustained.		21	Q. Nothing major?	
22	Q. Did you tell the -- you're saying that it says it, but it's		22	A. I think he gave him a computer once.	
23	not correct. Can you just tell us what's not correct?		23	Q. Anything else?	
24	MS. MOE: Objection, your Honor.		24	A. Not that I remember.	
25	THE COURT: Overruled. You may answer.		25	Q. You don't have any photographs of yourself with Epstein,	
LC1Qmax4	Jane - Cross	Page 533	LC1Qmax4	Jane - Cross	Page 535
1	A. This timeline is not correct. I did not know Emmy or		1	correct?	
2	Michelle while living in Florida. I knew them in New York.		2	A. Correct.	
3	Q. You did not live in a house in New York, correct?		3	Q. Or Ghislaine?	
4	A. No.		4	A. Correct.	
5	Q. You lived in an apartment, right?		5	Q. You don't have any photographs of you wearing the clothes	
6	A. Yes.		6	that you claim they bought you?	
7	Q. So you didn't have a house phone in New York?		7	A. No.	
8	A. I think we did have a house phone, actually. Actually, we		8	Q. The plaid pants and the Ralph Lauren sweater, right?	
9	did for sure.		9	A. That's right.	
10	Q. There was staff present at Mr. Epstein's eight-story		10	Q. You claimed that there was a photo of you that Epstein kept	
11	mansion, right?		11	on his desk, and you were wearing a bathing suit, right?	
12	A. Yes.		12	A. Yes.	
13	Q. And the staff included a chef, right?		13	Q. You don't know whether that photograph was ever found,	
14	A. Yes.		14	correct?	
15	Q. And a house manager?		15	A. Correct.	
16	A. Yes.		16	Q. Do you have any records of when you went to the Lion King,	
17	Q. And a driver?		17	like a program?	
18	A. Yes.		18	A. No, I don't have really anything from that time of my life.	
19	Q. And so all of those people saw you staying in this mansion		19	Q. You said that Epstein paid for your acting lessons, right?	
20	by yourself as a 14 year old, right?		20	A. Yes.	
21	A. Yes.		21	Q. At a particular studio?	
22	Q. You said that Epstein gave you money almost every time that		22	A. Yes.	
23	you saw him, right?		23	Q. And you said that he paid a particular voice coach for you?	
24	A. Correct.		24	A. Yes.	
25	Q. Hundreds of dollars at a time?		25	Q. Have you got records of any of those payments?	



LC1Qmax4	Jane - Cross	Page 536	LC1Qmax4	Jane - Cross	Page 538
1 A. No.			1 A. Right.		
2 Q. You've met with the government quite a few times in person,			2 Q. There's nothing on the photographs themselves?		
3 correct?			3 A. Right.		
4 A. Correct.			4 Q. And you testified yesterday that Epstein just kept calling		
5 Q. You've had a number of trial preparation sessions?			5 you and calling you in the 2000s until you stopped answering		
6 A. Not -- not -- what's a number?			6 his phone calls, right?		
7 Q. What's that?			7 A. Yes.		
8 A. What do you mean by preparations?			8 Q. So there would be phone records of all those calls, right?		
9 Q. Trial prep sessions?			9 A. Yes.		
10 A. Yes.			10 Q. It took you quite some time to report this to law		
11 Q. Where they were talking about your testifying here?			11 enforcement, right? We talked about that at the beginning		
12 A. Yes.			12 yesterday?		
13 Q. And there was a mock cross-exam that you engaged in with			13 A. Yes.		
14 the government, right?			14 Q. In the meantime, you got a job on a soap opera, right?		
15 A. Yes.			15 A. Right.		
16 Q. Where you practiced answering questions like we are now?			16 Q. You received an income from that job?		
17 A. Not practicing, no.			17 A. Yes.		
18 Q. Did you rehearse your direct testimony?			18 Q. You had an agent?		
19 A. No, I did not.			19 A. Yes.		
20 Q. You continued to travel on Mr. Epstein's dime after you			20 Q. You had a number of family members that lived nearby in the		
21 escaped in 1999, correct?			21 2000s, right?		
22 A. That is not true.			22 A. Yes.		
23 Q. Well, you took flights on his private jet after 1999,			23 Q. And once you had established yourself as an actress with		
24 right?			24 income, you didn't call up the police to let them know what you		
25 A. Only one.			25 claimed had happened to you, right?		
LC1Qmax4	Jane - Cross	Page 537	LC1Qmax4	Jane - Cross	Page 539
1 Q. Do you remember taking commercial flights that he paid for?			1 A. Right.		
2 A. No.			2 Q. In the late 2000s, 2007, 2008, you saw on the news that		
3 Q. I will have you look at Exhibit J-37 and see if this			3 Epstein had been arrested, right?		
4 refreshes your recollection. And the J numbers are behind the			4 A. Right.		
5 green flag.			5 Q. And charged, right?		
6 MS. MENNINGER: Your Honor, I think it's going to make			6 A. Yeah.		
7 more sense for me to come back to this.			7 Q. And so you knew the authorities were investigating		
8 THE COURT: Okay.			8 Mr. Epstein in 2007, 2008, right?		
9 Q. You do recall sending a photograph of yourself to Epstein			9 A. Right.		
10 after you moved to LA, right?			10 Q. You didn't pick up the phone then and call the people that		
11 A. Yes.			11 you knew were investigating him then, correct?		
12 Q. That was Government Exhibit 245, right?			12 A. Correct.		
13 Where you wrote "Thanks for rocking my world"?			13 Q. You knew how do that, right?		
14 A. Yes. Embarrassing.			14 A. Right.		
15 Q. And you wrote that when you were 19?			15 Q. You knew how to get a lawyer?		
16 A. 19, yes.			16 A. Right.		
17 Q. You testified yesterday that your mom made you send that to			17 Q. You chose not do that?		
18 him, right?			18 A. Yes.		
19 A. Yes.			19 Q. And you started to see some press that mentioned yourself?		
20 Q. So your mom could clearly corroborate that, right?			20 A. Yes.		
21 A. Yes.			21 Q. And so you did hire a lawyer, right?		
22 Q. And there were no dates on those photographs, right?			22 A. Yes.		
23 A. Correct.			23 Q. And a lot of the press that you saw mentioned about		
24 Q. So it's your recollection about the age you were in those			24 yourself was false, correct?		
25 photographs, right?			25 A. I don't remember what the exact press was.		

LC1Qmax4	Jane - Cross	Page 540	LC1Qmax4	Jane - Cross	Page 542
1	Q. Were there allegations that you were a Yugoslavian sex		1	A. Yes.	
2	slave that you saw on the internet?		2	Q. You were being approached by the media, right?	
3	MS. MOE: Objection to relevance, your Honor.		3	A. Yes.	
4	MS. MENNINGER: I'm asking if she saw the press?		4	Q. The media was wanting you to give statements, right?	
5	THE COURT: I'll allow it.		5	A. Right.	
6	A. I don't remember reading that.		6	Q. And you could have directed your lawyer to call the	
7	Q. You wanted to stop the press about you, right?		7	government and report this crime you're claiming now, right?	
8	A. Yes.		8	A. I don't know.	
9	Q. So you hired an attorney?		9	Q. You didn't hire her for that purpose, right?	
10	A. Yes.		10	A. No.	
11	Q. And that was around 2015?		11	Q. You could have, right?	
12	A. Yes, I think so.		12	A. I guess I could have, yeah.	
13	Q. You hired a litigator, a tough litigator, right?		13	Q. In 2019, before Epstein was arrested, you were contacted by	
14	A. Yes.		14	Agent Amanda Young, right?	
15	Q. You paid her a lot of money?		15	A. Right.	
16	A. Yes.		16	Q. She gave you a call?	
17	Q. Quarter of a million dollars?		17	A. Yes.	
18	A. No.		18	Q. She asked to speak with you, right?	
19	Q. Do you recall speaking with the government in December of		19	A. Yes.	
20	2019?		20	Q. And you said you were just not interested in getting	
21	A. Yes.		21	involved, right?	
22	Q. I'm sorry, got that date wrong. September 2 of 2021, so a		22	A. That's right.	
23	few months ago?		23	Q. And then thereafter, you hired a different attorney, right?	
24	A. Yes.		24	A. Yes.	
25	Q. At that time, you said you gave this litigator a quarter of		25	Q. You hired Mr. Glassman?	
LC1Qmax4	Jane - Cross	Page 541	LC1Qmax4	Jane - Cross	Page 543
1	a million dollars?		1	A. Yes.	
2	A. No, that is incorrect.		2	Q. Mr. Glassman is a personal injury lawyer, right?	
3	Q. Why?		3	A. Yes.	
4	A. First of all, I don't have that much money to give away,		4	Q. Mr. Glassman, touts the very large verdicts that he has	
5	and it was \$25,000. So maybe it's a typo?		5	received on his web page, correct?	
6	Q. I'm going to have you look at 3509-023.		6	MS. MOE: Objection.	
7	A. Yeah, I see it.		7	THE COURT: Grounds.	
8	Q. In the last full paragraph in the middle of the paragraph.		8	MS. MOE: Hearsay.	
9	A. Yes.		9	THE COURT: Sustained.	
10	Q. Does that refresh your recollection that you told the		10	Q. Are you aware of Mr. Glassman's advertising?	
11	government you did not know you would need a \$250,000 retainer?		11	A. No.	
12	A. That's not correct because I never said that. I would not		12	Q. Did you ever look at his website?	
13	be able to afford to pay anybody that much money for anything.		13	A. No. He's a friend of a friend.	
14	Q. Well, you paid her some amount of money?		14	Q. You hired him on September 3 of 2019, correct?	
15	A. Yes.		15	A. I don't know the exact date, but --	
16	Q. \$25,000?		16	Q. Okay. Let's take a look at J-14. Do you recognize that	
17	A. \$25,000.		17	document?	
18	Q. And you did that to help her stop the media about you?		18	A. Yes.	
19	A. Stop people from harassing me and bullying me into trying		19	Q. And what is that document?	
20	to give some sort of interview or statement.		20	A. Attorney-client contingent fee contract.	
21	Q. Well, you were being approached by lawyers?		21	Q. That's between you and Mr. Glassman, right?	
22	A. Yes.		22	A. Yes.	
23	Q. Lawyers for Virginia Roberts, for example?		23	Q. If you could look at the last page, does that refresh your	
24	A. Yes.		24	recollection about when you hired Mr. Glassman?	
25	Q. You spoke to them?		25	A. Yes.	

LC1Qmax4	Jane - Cross	Page 544	LC1Qmax4	Jane - Cross	Page 546
1 Q. When did you hire Mr. Glassman?			1 Q. You've read the press about Epstein?		
2 A. September 3, 2019.			2 A. Correct.		
3 Q. That was two weeks before you met with the government for			3 Q. You've talked about the press about Epstein with other		
4 the first time, right?			4 people?		
5 A. I don't know those dates.			5 A. What's that question?		
6 Q. I want to look back at 3509-001, at the date. Does looking			6 Q. You've talked about the press about Epstein with other		
7 at the left-hand corner of 001 refresh your recollection about			7 people?		
8 the date that you first met with the government?			8 MS. MOE: Objection to form.		
9 A. It doesn't, but if that's what it says, then --			9 Q. Well, you had discussions --		
10 Q. September 19, 2019 seems about right, correct?			10 MS. MENNINGER: I'll rephrase, your Honor. Maybe that		
11 A. Correct.			11 will help.		
12 Q. You hired Mr. Glassman before this meeting with the			12 Q. You've spoken with your ex-boyfriend you were calling Matt		
13 government, right?			13 about Epstein, right?		
14 A. Right.			14 A. Yes.		
15 Q. Mr. Glassman was at the first meeting with the government,			15 Q. And you and he watched news reports together, correct?		
16 right?			16 A. Yes.		
17 A. Yes.			17 Q. And you pieced some things together, correct?		
18 Q. As well as Mr. Werksman, the second lawyer, right?			18 A. I pieced things? What's the question? Sorry.		
19 A. Right.			19 Q. You and Matt pieced things together based on your review of		
20 Q. And those were both personal injury lawyers that you had			20 press about Epstein, correct?		
21 selected?			21 MS. MOE: Objection to form.		
22 A. Yes.			22 THE COURT: Overruled.		
23 Q. You didn't hire a lawyer that specializes in victims'			23 A. I don't understand what pieced together means.		
24 rights, correct?			24 Q. You talked to Virginia Roberts' lawyer, Brad Edwards,		
25 A. I hired a lawyer based on advice from my husband's friend,			25 right?		
LC1Qmax4	Jane - Cross	Page 545	LC1Qmax4	Jane - Cross	Page 547
1 their friends.			1 A. Yes.		
2 Q. He's not a specialist in criminal law, for example?			2 Q. You talked to Stan Pottinger?		
3 A. I guess not.			3 A. Yes.		
4 Q. And you had Mr. Glassman and Mr. Werksman in the first			4 Q. You know they represent other Epstein accusers, right?		
5 meeting with the government, right?			5 A. Yes.		
6 A. Right.			6 Q. Your lawyer has spoken to other lawyers?		
7 MS. MENNINGER: May I have one moment, your Honor?			7 MS. MOE: Objection.		
8 THE COURT: You may.			8 THE COURT: I suppose you can ask if she knows that.		
9 (Pause)			9 Q. Do you know whether your lawyer has spoken to other lawyers		
10 MS. MENNINGER: Your Honor, would this be a good			10 who represent Epstein accusers?		
11 stopping point?			11 A. I wouldn't know that.		
12 THE COURT: We were having a little issue with the			12 Q. You've talked to your family members, right?		
13 jurors' lunch, so not quite yet.			13 A. Some of them.		
14 MS. MENNINGER: Okay. I'm just trying to find			14 Q. You've talked to your ex-boyfriend, Matt, right?		
15 something I can do on a short notice -- a short section.			15 A. Yes.		
16 THE COURT: You can just start another section and			16 Q. And during that period of time, all of the pieces of		
17 we'll break, that's fine.			17 information and conversations that you've had are part of what		
18 MS. MENNINGER: I appreciate that.			18 you now know about the Epstein case, correct?		
19 BY MS. MENNINGER:			19 MS. MOE: Objection.		
20 Q. In the period of time between '99 and 2019, there has been			20 THE COURT: Just a moment.		
21 a lot of things that have happened, right?			21 One word. Grounds.		
22 A. Right.			22 MS. MOE: Form. Vague and confusing.		
23 Q. You have read the press, including stories about yourself,			23 THE COURT: Overruled. You can state the question		
24 correct?			24 again.		
25 A. Correct.			25 Q. All of the conversations that you've had and the press that		

LC1Qmax4	Jane - Cross	Page 548	LC1Qmax4	Jane - Cross	Page 550
1	you've read and the people that you've talked to, all of those		1	Q. Yes, do you remember taking these trips?	
2	pieces of information go into what you know about the Epstein		2	A. I don't remember these in particular. These are old. I	
3	case as you sit here today, correct?		3	don't know.	
4	A. I wouldn't say it like that, no.		4	Q. Let me direct your attention to the second from the bottom	
5	Q. You don't remember all of the things that you've talked		5	one.	
6	about, right?		6	A. Okay.	
7	A. No, I don't remember all the things I talked about.		7	Q. Do you recognize those airport codes or the dates of travel	
8	Q. You don't remember all the things that you read, correct?		8	indicated there?	
9	A. No.		9	A. I don't know what those airport codes are. If somebody	
10	Q. You don't know all of the websites that you've seen, right?		10	could translate them for me.	
11	A. No, I try to avoid those.		11	Q. Let me ask you this: In April of 1996, did you take a trip	
12	Q. But you've read them enough to hire a lawyer to stop some,		12	abroad?	
13	right?		13	A. I don't remember.	
14	A. No, that's based more on people calling me, harassing me,		14	Q. How old were you in April of 1996?	
15	calling my husband, harassing him, calling my work, calling my		15	A. 15.	
16	friends. And I wanted these people to stop calling me and go		16	Q. And do you remember going abroad when you were 15?	
17	away. It's not based on tabloids. I've been in enough online		17	A. I don't remember.	
18	tabloids. Being an actor, you read all kinds of stuff about		18	Q. Did you ever attend a vocal competition in Italy?	
19	yourself.		19	A. Oh, yes.	
20	Q. You're aware of the media out there about yourself, right?		20	Q. And that was in April of 1996?	
21	A. Some of it, yeah.		21	A. I guess it was.	
22	Q. During your teenage years, you traveled quite frequently,		22	Q. Was it? I'm asking you.	
23	correct?		23	A. I don't remember. I was 15.	
24	A. I guess it's all relative, but yeah, I guess.		24	Q. Okay. And then there was another trip that you took, maybe	
25	Q. You traveled back and forth to a country in northern		25	you'll recall, in June of 1997. How old were you in June of	
LC1Qmax4	Jane - Cross	Page 549	LC1Qmax4	Jane - Cross	Page 551
1	Europe?		1	1997?	
2	A. Yes.		2	A. 16.	
3	Q. You did that over the holidays?		3	Q. Do you remember a trip that you took in June of 1997?	
4	A. Yes.		4	A. I think I may remember what trip this was for, something	
5	Q. With your family?		5	having to do with a sibling.	
6	A. Yes.		6	Q. None of these trips involved Ghislaine Maxwell, right?	
7	Q. You were 15 when you went on one of those trips?		7	A. No.	
8	A. I don't remember, but --		8	Q. You didn't travel abroad with her?	
9	Q. I will have you take a look at J-6. I assume you have not		9	A. No.	
10	seen this document before?		10	Q. And Epstein as well, you didn't travel abroad with him?	
11	A. No.		11	A. No.	
12	Q. Do you recognize your name on it?		12	Q. So, you may have taken a trip related to a sibling in June	
13	A. Yes.		13	of 1997 --	
14	Q. And do you see certain dates and --		14	A. Yes.	
15	MS. MOE: I'm sorry, your Honor, I don't believe I		15	Q. -- when you were 16?	
16	have J-6.		16	A. Yes.	
17	MS. MENNINGER: I thought you did. I'm really sorry.		17	Q. And then in January of 1998, how old were you?	
18	MS. MOE: I'm sorry, I do. Apologies.		18	A. 167.	
19	Q. You recognize your name and date of birth on this document?		19	Q. And you took a trip perhaps abroad then. Do you recall	
20	A. Yes.		20	that?	
21	Q. And does -- I realize that some of these dates are old, but		21	A. January 199 -- maybe a family thing? I don't remember.	
22	does looking at this, particularly page 2 towards the bottom,		22	I'm sorry.	
23	refresh your recollection about trips that you may have taken		23	Q. And then the last one I'll ask about is April of 1998. Do	
24	outside of the country?		24	you remember taking a trip then?	
25	A. Do I remember these flights? Is that the question?		25	A. No, I don't remember what the trip was.	

LC1Qmax4	Jane - Cross	Page 552	LC1Qmax4	Jane - Cross	Page 554
1 Q. And how old were you in April of 1998?			1 Q. Your sister?		
2 A. 17.			2 A. No.		
3 Q. You continued to travel throughout the 2000s abroad. Is			3 Q. Has never needed financial support from you?		
4 that right?			4 A. No.		
5 A. That's right.			5 Q. You had your mother living with you, right?		
6 Q. When you were in your -- in the mid-1990s, you participated			6 A. Yes.		
7 in a beauty pageant, correct?			7 Q. And she had some financial difficulties, right?		
8 A. Embarrassingly enough, so, yes.			8 A. Yes.		
9 Q. A Miss Teen pageant?			9 Q. And you needed to help her with her finances, right?		
10 A. Yes.			10 A. Yes.		
11 Q. The big one, right?			11 Q. I think at one point you claim that you were putting a roof		
12 A. Mmm, fairly big.			12 over your family's head, right?		
13 Q. And it was associated with Mr. Trump, right?			13 A. I don't know if I used that -- those words, but they lived		
14 A. Yes.			14 in my house, yes.		
15 Q. And that was in a state that you were in in that time			15 Q. You told that to Matt?		
16 frame, right?			16 A. Oh, well...		
17 A. Yes.			17 Q. Right?		
18 Q. You were given \$2,000 by Epstein for a dress?			18 A. I don't recall if those are the words I told him, but yes,		
19 A. I don't recall that.			19 they were living in my house.		
20 Q. Do you recall being devastated that Epstein only gave you			20 Q. And once you hired Mr. Glassman in September of 2019, he		
21 \$2,000 for a dress?			21 talked to you about your decision to cooperate in the criminal		
22 A. No, I don't recall that.			22 case, correct?		
23 Q. Or crying because he only gave you \$2,000 for a dress?			23 MS. MOE: Objection.		
24 A. No, that's ridiculous. I wouldn't do that.			24 THE COURT: Sustained.		
25 Q. You performed on a reality show, correct?			25 MS. MENNINGER: Your Honor, he shared this with the		
LC1Qmax4	Jane - Cross	Page 553	LC1Qmax4	Jane - Cross	Page 555
1 A. Yes.			1 government. May we have a sidebar?		
2 Q. In the 2000s?			2 THE COURT: No. If you want to try to get around		
3 A. Yes.			3 privilege, you'll raise it in advance, as I've made clear.		
4 Q. With your ex-boyfriend, Matt?			4 Sustained.		
5 A. Yes.			5 BY MS. MENNINGER:		
6 Q. And you had cameras in your home, right?			6 Q. When you decided finally to file a civil lawsuit, that was		
7 A. Yes.			7 in January of 2020, right?		
8 Q. You had some conflict with your mother during that?			8 A. I don't recall the exact date.		
9 A. Yes.			9 Q. And you filed that under a pseudonym?		
10 Q. And you had other friends who were also on the show?			10 A. Yes.		
11 A. Yes.			11 Q. Jane, right?		
12 Q. And the cameras followed you around, right?			12 A. Yes.		
13 A. Yes.			13 Q. And you did that with the help of Mr. Glassman?		
14 Q. In that show, you talked about roughing it for you would be			14 A. Yes.		
15 going to the Four Seasons, something like that?			15 Q. And you sued Ghislaine, right?		
16 A. Well, reality shows aren't really reality, so most of it is			16 A. Yes.		
17 produced by producers.			17 Q. You sued Epstein's estate, correct?		
18 Q. And you were paid for that reality show, right?			18 A. Yes.		
19 A. Yes.			19 Q. You also made a claim in the Virgin Islands against		
20 Q. In the last few decades, you have supported your family,			20 Epstein's estate, correct?		
21 right?			21 A. I don't know.		
22 A. Not all of them, but a few of them, yes.			22 Q. At some point you made a demand for Ghislaine to pay you		
23 Q. You have had some of your brothers that have had to live			23 money, correct?		
24 with you?			24 A. I don't know what a demand means.		
25 A. Yes.			25 Q. Well, your lawyer sent a letter demanding that she pay you		

LC1Qmax4	Jane - Cross	Page 556	LC1Qmax4	Jane - Cross	Page 558
1	money?		1	abused by any individuals other than Epstein, correct?	
2	MS. MOE: Objection to foundation.		2	MS. MOE: Your Honor, we're now reading a document	
3	THE COURT: Sustained.		3	that is not in evidence.	
4	Q. Do you know whether your lawyer sent Ghislaine a letter		4	THE COURT: Sustained.	
5	demanding money?		5	Q. Do you recall answering or telling the claims program that	
6	A. I don't know that.		6	you were making a claim against Ms. Maxwell?	
7	Q. You knew at the time you had that civil complaint going,		7	A. Yes.	
8	that Ghislaine was charged in this case, correct?		8	Q. And you were ultimately made an offer by the claims	
9	A. Correct.		9	program, right?	
10	Q. You also participated in the Epstein Victims' Compensation		10	A. Yes.	
11	Program, right?		11	Q. And you were told what that offer was?	
12	A. Yes.		12	A. Yes.	
13	Q. And with your lawyer's assistance, you filled out the claim		13	Q. What was that initial offer?	
14	form for that, right?		14	A. \$5 million.	
15	MS. MOE: Objection.		15	Q. Do you know whether your attorney went back and asked for	
16	THE COURT: Sustained.		16	more money?	
17	Q. Did you fill out the claim form?		17	A. I don't know that.	
18	A. Did I personally? No.		18	Q. This year you were wired the money, right, \$5 million?	
19	Q. Did you sign the claim form?		19	A. Well, not the entirety, no.	
20	A. Yes.		20	Q. I would like to ask you to take a look at Exhibit J-40. Do	
21	Q. Did you notarize your signature for the claim form?		21	you recognize this document?	
22	A. I don't remember.		22	A. Yes.	
23	Q. Did you attest that everything in the claim form that you		23	Q. And do you recognize the date of the document?	
24	submitted was true and accurate?		24	A. Yes.	
25	A. Yes.		25	Q. Do you recognize your name on the document?	
LC1Qmax4	Jane - Cross	Page 557	LC1Qmax4	Jane - Cross	Page 559
1	Q. In that claim form that you attested was accurate, you were		1	A. Yes.	
2	asked whether or not you were participating in the prosecution		2	Q. And on the last page, do you recognize your signature?	
3	of any case related to Epstein, right?		3	A. Yes.	
4	A. I don't remember what's in the form.		4	MS. MENNINGER: Your Honor, at this time I would move	
5	Q. If I could have you look at Exhibit J-18 on page 6. And if		5	for the admission of this under seal because it has identifying	
6	you need to look at the last page to see your signature, just		6	information as Exhibit J-40.	
7	let us know.		7	MS. MOE: Your Honor, may we take up this issue during	
8	A. Okay.		8	the lunch break? We object.	
9	Q. Do you see question 11?		9	THE COURT: Okay. We'll break for lunch, members of	
10	A. Yes.		10	the jury. We almost have all your lunches in hand. I'm hoping	
11	Q. And it asks you: Have you filed litigation against Epstein		11	by the time you get back, everything will be set. So we'll	
12	or the Estate of Epstein, right?		12	break about 45 minutes for lunch. Enjoy your lunch. Thank	
13	A. Yes.		13	you.	
14	Q. Or any related entities or individuals, right?		14	(Jurors not present)	
15	A. Right.		15	THE COURT: Everyone may be seated. Can I have J-40	
16	Q. You said yes?		16	back up so we can discuss?	
17	A. Yes.		17	Grounds.	
18	Q. And you listed your civil case, correct?		18	MS. MOE: Thank you, your Honor.	
19	A. Correct.		19	We have a 401 and 403 objection to this document.	
20	Q. But you also said "refer to the attachment"?		20	This is a multipage document containing legal terms relating to	
21	A. Well, I didn't write this, but --		21	a civil settlement.	
22	Q. You signed it?		22	To the extent the defense intends to impeach this	
23	A. I signed it, yeah.		23	witness about the fact that she settled a claim and received a	
24	Q. And then the next question, question 12, you were asked		24	sum of money, that's already in the record.	
25	whether or not you'd ever been trafficked to and sexually		25	This document contains additional and, frankly,	

LC1Qmax4	Jane - Cross	Page 560	LC1Qmax4	Jane - Cross	Page 562
1	complicated legal terms about a settlement agreement between		1	MS. MENNINGER: Yes.	
2	this witness and an estate that's not a party to this case. We		2	THE COURT: As to what the contention is, what the	
3	think this document is confusing to the jury and don't		3	proffer is, and then I'll hear from you. 40 minutes.	
4	understand any potential impeachment relevance of the		4	(Luncheon recess)	
5	particular terms of the settlement.		5	(Continued on next page)	
6	MS. MENNINGER: Your Honor, it's a representative --		6		
7	it's a documentary representative of the amount of money that		7		
8	she received in the settlement. I don't know what's confusing		8		
9	about that. I am not going to spend a lot of time arguing some		9		
10	legal clauses or anything like that, but I think our jury is		10		
11	sophisticated enough to know what a settlement agreement looks		11		
12	like and the amount of money that she received. She's		12		
13	contesting that that's the amount of money she received, but I		13		
14	don't think that precluding us from putting in a document		14		
15	because it has legal language in it is an appropriate --		15		
16	THE COURT: That's the 403 argument, that it's legal		16		
17	language?		17		
18	MS. MOE: Yes, your Honor.		18		
19	THE COURT: The government puts in cooperation		19		
20	agreements all the time. Those are not the models of clarity.		20		
21	MS. MOE: Of course, your Honor, and that's certainly		21		
22	true --		22		
23	THE COURT: This is comparable legal language, isn't		23		
24	it?		24		
25	MS. MOE: No, your Honor. I think the difference		25		
LC1Qmax4	Jane - Cross	Page 561	LC1VMAX5	Jane - cross	Page 563
1	here, and it's an important one is, as a proponent of the		1	AFTERNOON SESSION	
2	evidence, the defense has the burden of establishing its		2	1:50 P.M.	
3	relevance. At this point what they've articulated is that they		3	THE COURT: All right. Matters to take up?	
4	want the exact figure that was disbursed, which this witness		4	MS. MENNINGER: Yes, your Honor.	
5	has already testified to and --		5	May I approach?	
6	THE COURT: It's just a document of that agreement.		6	THE COURT: Microphone.	
7	I'm going to overrule this objection.		7	MS. MENNINGER: I have one exhibit that relates to the	
8	Anything else?		8	testimony I'd like to --	
9	MS. MOE: Your Honor, in our view, this sort of opens		9	THE COURT: Okay.	
10	the door to a lot of legal issues related to the settlement		10	MS. MENNINGER: Your Honor --	
11	funds that are not proper before the jury. It's cumulative of		11	THE COURT: Would you come to the --	
12	the testimony about this particular figure and would be		12	MS. MENNINGER: Oh, yes.	
13	confusing about its particular terms.		13	THE COURT: Take your mask off, if you'd like.	
14	THE COURT: Yes, that's what I just overruled.		14	MS. MENNINGER: As with some of the evidence, your	
15	MS. MOE: Understood, your Honor.		15	Honor, I understand that, when questioned, the witness might	
16	THE COURT: Anything else to take up? We'll break for		16	deny knowledge about this communication to the government by	
17	lunch for 45 minutes. Thank you.		17	her attorney, but I would like to ask her if she has knowledge	
18	And, Ms. Menninger, if you have an argument that		18	of this communication.	
19	you're going to pierce attorney-client privilege --		19	THE COURT: What exact question would you ask?	
20	MS. MENNINGER: Yes, your Honor. Can we take that up		20	MS. MENNINGER: Your Honor, I would ask her did she	
21	right after lunch in a sidebar? I believe I have grounds.		21	have a communication from her attorney about why she should	
22	THE COURT: You have to speak into the microphone. It		22	cooperate and testify at this criminal trial.	
23	should have been briefed. I think that would be clear, but,		23	THE COURT: Did she have a communication from her	
24	yes, I'll meet with you in 40 minutes. You'll confer in		24	attorney about why she should cooperate and testify at this	
25	advance.		25	trial.	

<p>LC1VMAX5 Jane - cross Page 564</p> <p>1 MS. MENNINGER: I mean, I could start with the 2 question of does she know whether her attorney shared that with 3 someone else, which is the waiver question, in my mind, anyway. 4 But the ultimate question I would like to get to is her 5 attorney told her that. 6 THE COURT: Right. So you want to get to a 7 communication between attorney and client. It's privileged, 8 right? And you're arguing that it's been waived or what are 9 you arguing? 10 MS. MENNINGER: Yes, I'm arguing that it's been waived 11 because it was communicated to the government. 12 THE COURT: Ms. Moe. 13 MS. MOE: Thank you, your Honor. 14 I think that question is a few moves down the 15 chessboard. 16 THE COURT: Could you pull up the microphone, please. 17 MS. MOE: Yes, your Honor. 18 I think there would be no issue with a question about 19 this witness's understanding of whether the outcome of this 20 case would help in a civil case or whether at the time she 21 decided to cooperate with the government and be interviewed she 22 thought that would help her get money in a civil case. That 23 would be just a question about whether she had bias and motive; 24 that wouldn't go to issues of attorney-client privilege about 25 her general understanding. I think the question becomes, if</p>	<p>LC1VMAX5 Jane - cross Page 566</p> <p>1 nonprivileged communication, right, between the attorney and 2 the witness's attorney and the government. 3 MS. MOE: Yes, your Honor. That is my note to file 4 about a conversation with Mr. Glassman. In our view, my notes 5 about a conversation with someone who's not this witness can't 6 be an exhibit at the trial. There are separate questions about 7 her conversations with her attorneys that implicates other 8 privilege issues. 9 THE COURT: You don't have any objection to 10 Ms. Menninger asking the witness if she has any awareness of 11 her participation in this criminal proceeding impacting -- what 12 is the underlying question? Let me just get the underlying 13 question before we get -- Ms. Menninger. 14 MS. MENNINGER: Your Honor, the underlying question is 15 she expected to get a higher payout in her civil case if she 16 testified in and cooperated in this criminal case. That's the 17 ultimate underlying issue. 18 THE COURT: Did she have any basis to believe that by 19 testifying in this criminal case, it would aid the payment she 20 would get in the -- with respect to the fund or the civil case? 21 MS. MENNINGER: Well, they ultimately became as one. 22 But at the time her initial advice from Mr. Glassman came in, 23 there was not a victims' compensation fund. That arose during 24 the course of her civil case. And so -- 25 THE COURT: And the line you're interested in is that</p>
<p>LC1VMAX5 Jane - cross Page 565</p> <p>1 she says no, if a privileged communication with her attorney 2 would be a proper basis for impeachment. 3 On that score, if we get to that scenario, this 4 witness's counsel is in the courtroom. I've conferred with him 5 about the privilege issue. My understanding is his view is 6 this is privileged and he'd like to confer with his client 7 about that. But I think he'd like to be heard on the question 8 of privilege and waiver. It's not the government's privilege 9 to hold or waive or speak to; and so we'd ask for him to be 10 heard on that question. 11 THE COURT: Well, I guess it still depends what we're 12 talking about. What is the "this" in that sentence? 13 MS. MOE: It sounds like, your Honor, if defense 14 counsel plans to impeach this witness about bias by offering a 15 statement of her attorney to the government, that that 16 implicates a privilege question. If separately defense counsel 17 plans to ask this witness just generally -- 18 THE COURT: The statement from the attorney to the 19 government is not privileged. This is not privileged. The 20 question goes to her communication with her attorney, that's 21 where the privilege is. 22 MS. MOE: Exactly, your Honor. 23 THE COURT: I'm not yet seeing the connection between 24 what I -- I don't know what the basis of admissibility would be 25 with respect to this email that's been handed up, which is a</p>	<p>LC1VMAX5 Jane - cross Page 567</p> <p>1 he mentioned he told her it would help her case? 2 MS. MENNINGER: Yes, your Honor. Because prior to 3 that line, he's disclosing that he discussed whether 4 cooperating with the case and then ultimately gets to the 5 question of testifying in the case, he says, were the morally 6 right thing to do. And they had discussed how testifying at 7 trial was the right thing to do. He also mentioned that he had 8 told her it would help her case. It is slightly ambiguous. I 9 don't know if it refers back to the entirety of the things said 10 before it, but that's what the email or the note says. 11 THE COURT: Okay. So you want to ask her if she had 12 any basis to conclude that her participation as a witness here 13 would help her civil litigation recovery prospects. 14 MS. MENNINGER: Right, your Honor. If it were a 15 cooperation agreement and a witness had cooperated and someone 16 had promised that they would get a lesser sentence if they 17 cooperated, I can see that also being admissible. So maybe 18 just the -- 19 THE COURT: The attorney's advice to the client about 20 whether they should take a plea and what assistance that might 21 get them and all of that obviously is privileged. 22 MS. MENNINGER: It is, until you disclose it to the 23 government. I totally agree with that, your Honor. 24 THE COURT: Okay. So then the question is if she 25 answers yes to that question, I had some reason to believe that</p>



LC1VMAX5	Jane - cross	Page 568	LC1VMAX5	Jane - cross	Page 570
1	it would -- it might have some impact -- my participating would		1	money by testifying in the criminal case, that can affect, you	
2	have some impact on the civil litigation, do you have		2	know, whether or not it's an appropriate -- you know, whether	
3	additional questions?		3	the witness has an expectation that is somewhat colored by the	
4	MS. MENNINGER: May I confer, your Honor?		4	government's plan or putting them on the stand, you know,	
5	THE COURT: Yes.		5	knowing that. It's an issue of whether the witness is coming	
6	(Counsel conferred)		6	and testifying knowing that the person who's calling them to	
7	MS. MENNINGER: Your Honor, I suppose that there might		7	the stand is aware of this whole plan to get more money from	
8	be additional question -- you know that your lawyer told the		8	the civil case by testifying here.	
9	government that.		9	THE COURT: What does that tell us at all about her	
10	THE COURT: So however she answers that, I suppose you		10	motivation? The two pieces aren't linking up. There's does	
11	want to ask, Do you know that your lawyer told the government		11	she have in her mind that testifying might help her in the	
12	that?		12	civil case. The answer to that is yes. I don't see -- it	
13	MS. MENNINGER: Yes.		13	seems to me it's potentially -- it's attorney-client privilege	
14	THE COURT: Do you have an objection to the "Do you		14	issues because it's about what her attorney communicated to	
15	know that your lawyer told the government that"?		15	her. And it's hard to see any additional relevance that comes	
16	MS. MOE: I'm sorry, your Honor. I'm trying to follow		16	from whether the fact -- whether the government knew -- whether	
17	the logic of trying to impeach a witness by her knowledge of an		17	she knew that the government knew that she believed that -- or	
18	attorney's statement to the government about a client's		18	testifying would help her civil case, because it doesn't link	
19	intention. I don't think that tracks the logic of impeachment		19	up to the benefit part.	
20	by bias or by a prior inconsistent statement. I'm not sure how		20	So I think the first question would be fine. If the	
21	that establishes impeachment under the rule.		21	answer is yes, my inclination is not to allow the second	
22	THE COURT: The fact that she knows her lawyer told		22	question on both privilege, 401/403 grounds. So then the	
23	the government that.		23	question is if the answer is no, then what do you propose?	
24	MS. MOE: Your Honor, that appears to be an end-run		24	MS. MENNINGER: Your Honor, as with some of the other	
25	around getting in her conversations with her attorney. Because		25	issues in this case, if she says no, I think that there is	
LC1VMAX5	Jane - cross	Page 569	LC1VMAX5	Jane - cross	Page 571
1	the question is, Are you aware that your attorney made a		1	evidence that could be put on extrinsically, specifically, her	
2	statement to the government about his conversation with you		2	attorney's testimony.	
3	about your expected outcome in the case.		3	THE COURT: So you want to then call her attorney and	
4	THE COURT: Well, okay. At the first step, you agree		4	ask her attorney if he told her, advised her that if she	
5	they can ask if she had any basis to believe that her		5	participated in this case, she would -- it would help her in	
6	participation as a witness here would have any impact on her		6	the civil case.	
7	potential compensation in civil litigation. You don't object		7	MS. MENNINGER: Right. Because that is the only	
8	to that question?		8	portion that was waived. That's what he -- whatever he	
9	MS. MOE: No, your Honor, no objection.		9	communicated to the government is what was waived. I don't	
10	THE COURT: So then we have what if she says yes and		10	think he's waived -- I'm not arguing for subject matter waiver,	
11	what if she says no. So if she says yes, their follow-up		11	for example.	
12	question is, Are you aware that your attorney told the		12	THE COURT: So, first of all, as I've said before, you	
13	government that?		13	have to brief that. This is not enough. I haven't looked at	
14	I think I agree with you. I don't know what the		14	any law on that question. You've put none before me. I made	
15	relevance of that is. And it is an attorney-client		15	very clear you'd have to brief it. So we're not doing that	
16	communication.		16	today.	
17	What's the relevance of whether she knows her attorney		17	MS. MENNINGER: No, I understand, your Honor.	
18	told the government that?		18	THE COURT: Ms. Moe, what's your response to the	
19	MS. MENNINGER: Your Honor, I think it gets into her		19	waiver question?	
20	expectations that she -- that the government knows that she		20	MS. MOE: Your Honor, having not had an opportunity to	
21	knows. And so at that point she's testifying with an		21	research it or consider it or confer with Mr. Glassman, who --	
22	expectation that -- you know, if the government doesn't -- is		22	it's not my privilege to hold, so I can't speak to its waiver	
23	unaware of her attorney's advice, then it's just a secret		23	without researching the issue and conferring with Mr. Glassman.	
24	between her and her attorney. But if the government who is		24	THE COURT: The government not infrequently objects to	
25	calling her to testify is aware of her plan, intent to get more		25	privilege grounds to questions during trial. So the government	

LC1VMAX5	Jane - cross	Page 572	LC1VMAX5	Jane - cross	Page 574
1	certainly has a position, I'm sure.		1	Just to facilitate clarity with respect to the	
2	MS. MOE: Yes, your Honor.		2	threshold question here about the witness, about her	
3	I would just want to make sure I was conferring with		3	understanding if the question is phrased as her understanding	
4	her counsel about that issue and being mindful.		4	about testifying at trial today and the effect of a civil case,	
5	Broadly speaking, your Honor, to the extent this		5	I think the answer to that question has to be no because there	
6	evidence is offered for the purpose of impeaching the		6	is no civil case, there is no pending claim, it's all been	
7	credibility of the prosecutors in this case, which is what I		7	resolved.	
8	think what Ms. Menninger was suggesting, I think that would be		8	And so I just wanted to clarify whether the question	
9	entirely improper.		9	is at the time she started meeting with the government was that	
10	THE COURT: I think that's, in part, like the		10	her understanding, while the case was active, or whether the	
11	mysterious implication of the second question that I said I		11	question will be about her testimony here at trial.	
12	wouldn't allow.		12	Jane has testified on direct that her understanding is	
13	MS. MOE: Yes, your Honor.		13	she has no financial stake in the outcome of this case. The	
14	THE COURT: Because it just doesn't match up to		14	civil matter is resolved and the verdict in this case won't	
15	anything in motivating her.		15	affect what she's received from those settlements. And so I	
16	So we know where the branch of the tree ends. If the		16	just wanted to clarify in terms of how that question is phrased	
17	question is yes, that's the end of it. If the question is no,		17	and what we're getting at about the issue about testifying at	
18	then it sounds like we're done with this witness with that		18	trial or her initial decision to cooperate with the government.	
19	question. And then you're going to brief calling her lawyer		19	THE COURT: Fair enough.	
20	only on the question of whether he told the government that her		20	MS. MENNINGER: That's fair.	
21	participating -- testifying would help her civil case.		21	In the paragraph itself it refers to cooperating with	
22	MS. MENNINGER: He told her that. No, he told Jane		22	the case and it refers to testifying. So I think any reason to	
23	that.		23	believe either one of those --	
24	THE COURT: Right.		24	THE COURT: Can you just give us the specific	
25	MS. MENNINGER: Yes. And, your Honor, that would be		25	question.	
LC1VMAX5	Jane - cross	Page 573	LC1VMAX5	Jane - cross	Page 575
1	something to -- I mean would be --		1	MS. MENNINGER: Do you have any basis to believe --	
2	THE COURT: It would be waiver argument. You're going		2	any reason to believe that your cooperation would help with	
3	to brief waiver as to that on the basis that he told that to		3	this case, would help you with your civil case, that's one	
4	the government.		4	question.	
5	MS. MENNINGER: Exactly. The waiver was the telling		5	The other is do you have any reason --	
6	to the government. The question for him on the stand would be		6	THE COURT: I'm sorry. I don't think that	
7	what he told his client. But the briefing would be on the		7	clarifies -- I think it's unclarifying on two points that	
8	waiver question.		8	Ms. Moe has raised.	
9	THE COURT: Well, right. But whether he waived --		9	MS. MENNINGER: Okay.	
10	whether the privilege -- it's the client's to waive, I think.		10	THE COURT: One, cooperating in this case, meaning by	
11	That will be part of the briefing, I suppose.		11	testifying or more broadly. And two, since she no longer has a	
12	Okay. But if the answer is no, you don't have		12	pending civil case, I think she'd probably be left wondering	
13	anything further for this witness?		13	what you're referring to.	
14	MS. MENNINGER: I understand, your Honor.		14	Can you clarify the question -- I think what you're	
15	THE COURT: That was a question.		15	asking is at any point during your -- at any point in your	
16	MS. MENNINGER: Yes, that's right. I understood your		16	cooperation with the government -- "cooperation" is loaded	
17	Honor to say there is no other question, so I --		17	because it's not like there's a cooperation agreement or	
18	THE COURT: Well, no, it was a question. If she says		18	something. But for lack of a better term, cooperating with the	
19	no, do you have other questions for her?		19	government with respect to this criminal case, did you ever	
20	MS. MENNINGER: On this topic, no.		20	have an understanding that it might benefit you in what was	
21	On other topics, yes.		21	then a pending civil litigation?	
22	THE COURT: Yes, of course.		22	Ms. Moe, is that getting at what you're suggesting?	
23	MS. MENNINGER: Okay.		23	MS. MOE: Yes, your Honor. I just wanted to make sure	
24	THE COURT: I think Ms. Moe had something.		24	it was clear for the witness.	
25	MS. MOE: Yes, your Honor.		25	THE COURT: Okay.	

<p>LC1VMAX5 Jane - cross Page 576</p> <p>1 MS. MOE: Thank you.</p> <p>2 THE COURT: Ms. Menninger, is that getting at what you</p> <p>3 are suggesting?</p> <p>4 MS. MENNINGER: It is. I believe that he also</p> <p>5 communicated that testifying would benefit her in the criminal</p> <p>6 case.</p> <p>7 THE COURT: Okay.</p> <p>8 MS. MENNINGER: And so I'm not privy to whether, you</p> <p>9 know, at what point in time --</p> <p>10 THE COURT: How about did you ever have an</p> <p>11 understanding that any cooperation with the government,</p> <p>12 including testifying in this trial, would aid you in any way in</p> <p>13 your efforts to recover in the then-pending civil litigation?</p> <p>14 Does that get at it, Ms. Menninger? I'm not disputing that you</p> <p>15 should ask the question. I agree with Ms. Moe there's points</p> <p>16 for confusion, so let's just --</p> <p>17 MS. MENNINGER: I think it does, your Honor.</p> <p>18 I would have to kind of -- I would like to just write</p> <p>19 out the question so I understand. But I do think, as I</p> <p>20 mentioned a little bit earlier, because the civil litigation</p> <p>21 morphed into the victims' comp fund, there may be a similar</p> <p>22 question with respect to the comp fund. But I think I can</p> <p>23 draft this language and we could -- I can tell your Honor what</p> <p>24 it is in just a minute.</p> <p>25 THE COURT: Okay.</p>	<p>LC1VMAX5 Jane - cross Page 578</p> <p>1 THE COURT: It's cross, so --</p> <p>2 MS. MENNINGER: Right. Why not?</p> <p>3 -- you knew that cooperating with the government,</p> <p>4 including testifying, would benefit you in your civil</p> <p>5 litigation against the Estate of Epstein and Ms. Maxwell? And</p> <p>6 then the same question with respect to the victims'</p> <p>7 compensation fund.</p> <p>8 THE COURT: I'll never win this argument with a</p> <p>9 lawyer, but I always think it's a better question just to ask</p> <p>10 them did you know. But you do you.</p> <p>11 Okay. Any objection to that question?</p> <p>12 MS. MOE: No, your Honor.</p> <p>13 THE COURT: And the same formed question with respect</p> <p>14 to the victim compensation fund?</p> <p>15 MS. MOE: Yes, your Honor.</p> <p>16 THE COURT: Okay. Good.</p> <p>17 Anything else we can take up? And if not --</p> <p>18 MS. MOE: Your Honor, if possible, it would be helpful</p> <p>19 to have a sense of timing for the duration of cross for timing</p> <p>20 of next witnesses.</p> <p>21 THE COURT: Okay. Ms. Menninger?</p> <p>22 You took your foot off the gas for about the last half</p> <p>23 an hour there. Was that because you were looking forward to</p> <p>24 have some time during lunch or --</p> <p>25 MS. MENNINGER: No, your Honor. I have low blood</p>
<p>LC1VMAX5 Jane - cross Page 577</p> <p>1 (Pause)</p> <p>2 THE COURT: What else do we need to take up?</p> <p>3 MS. MOE: Your Honor, I'm not quite sure about the</p> <p>4 timing for the length of cross, but I did want to just remind</p> <p>5 the Court that the next witness raises the prior consistent</p> <p>6 statements issues we discussed at the conclusion of the Court</p> <p>7 day yesterday.</p> <p>8 THE COURT: I'm sorry, that what?</p> <p>9 MS. MOE: That the next witness we anticipate calling</p> <p>10 would be the witness identified as Matt. And so just wanted to</p> <p>11 tee up any issues relating to prior consistent statements.</p> <p>12 THE COURT: I think where we left it was that, as</p> <p>13 Ms. Sternheim said, we'll evaluate when you seek to introduce a</p> <p>14 prior consistent statement whether, in fact, it's consistent</p> <p>15 and whether they have attacked the veracity of that and, if</p> <p>16 not, you won't object.</p> <p>17 MS. STERNHEIM: Right.</p> <p>18 THE COURT: And if they do object, I'll decide.</p> <p>19 MS. MOE: Yes, your Honor.</p> <p>20 I just wanted to clear that in advance.</p> <p>21 THE COURT: Thank you.</p> <p>22 Okay. What do you have, Ms. Menninger?</p> <p>23 MS. MENNINGER: Under the authority of Rule 611(c), I</p> <p>24 have redrafted it into a leading question, if that's</p> <p>25 permissible, your Honor. And what I would ask is --</p>	<p>LC1VMAX5 Jane - cross Page 579</p> <p>1 sugar. Sorry. I did revive myself with a Diet Coke.</p> <p>2 Your Honor, I think I would estimate about 45 minutes.</p> <p>3 THE COURT: Okay. And then, Ms. Moe, do you</p> <p>4 anticipate substantial redirect?</p> <p>5 MS. MOE: I do anticipate redirect, but I don't</p> <p>6 anticipate it being lengthy.</p> <p>7 THE COURT: Okay. We have a plan.</p> <p>8 I think we can get the jury.</p> <p>9 And we can bring the witness back up please.</p> <p>10 (Witness present)</p> <p>11 (Jury present)</p> <p>12 THE COURT: Thank you for your patience, members of</p> <p>13 the jury. I hope you had a nice lunch. And we will continue</p> <p>14 with the cross-examination of Witness Jane.</p> <p>15 Jane, I remind you you are under oath.</p> <p>16 Ms. Menninger, you may continue.</p> <p>17 MS. MENNINGER: Thank you, your Honor.</p> <p>18 JANE, resumed.</p> <p>19 BY MS. MENNINGER:</p> <p>20 Q. I want to go back to something I needed to skip earlier. I</p> <p>21 was asking you about whether or not you had traveled on Jeffrey</p> <p>22 Epstein's expense commercially after you moved to Los Angeles.</p> <p>23 And I started to show you Exhibit J-37, so I'd like to do that</p> <p>24 and go to page 13, about three-quarters of the way down.</p> <p>25 See if you recognize your name.</p>

<p>LC1VMAX5 Jane - cross Page 580</p> <p>1 A. Yes.</p> <p>2 Q. And the date associated with your name?</p> <p>3 A. 4/17/2000.</p> <p>4 Q. And the amount?</p> <p>5 A. \$343.</p> <p>6 Q. Does that refresh your recollection that you were -- a trip</p> <p>7 was paid for you in April of 2000 for \$343?</p> <p>8 A. No, it doesn't.</p> <p>9 Q. Do you think that looking at other pages of your travel</p> <p>10 would refresh your recollection?</p> <p>11 MS. MOE: Objection.</p> <p>12 MS. MENNINGER: If the answer is no, I'm planning on</p> <p>13 moving on, your Honor. I can show other ones.</p> <p>14 THE COURT: Is there anything that would refresh your</p> <p>15 recollection?</p> <p>16 THE WITNESS: No.</p> <p>17 Q. We were talking a little bit earlier about your decision to</p> <p>18 testify in this case and cooperate with this case. You met</p> <p>19 with the government, I think we established, ten or more times</p> <p>20 over the last couple of years. Is that fair?</p> <p>21 A. Something like that.</p> <p>22 Q. And in each of those meetings, you had your attorney with</p> <p>23 you or the vast majority of those meetings?</p> <p>24 A. Yes.</p> <p>25 Q. Your attorneys are Mr. Glassman and Mr. Werksman, right?</p>	<p>LC1VMAX5 Jane - cross Page 582</p> <p>1 A. Yes.</p> <p>2 Q. You told the jury about an incident with your guidance</p> <p>3 counsellor, right?</p> <p>4 A. Yes.</p> <p>5 Q. Where you got in trouble --</p> <p>6 A. Yes.</p> <p>7 Q. -- for telling the guidance counsellor that your mother was</p> <p>8 unavailable and unsupportive, right?</p> <p>9 A. Yes.</p> <p>10 Q. So when you were in high school and you were mine, you</p> <p>11 didn't feel like your mother would get your back if you told</p> <p>12 her about Epstein's misconduct, right?</p> <p>13 A. Yes.</p> <p>14 Q. And your mother would not want you to report that to</p> <p>15 others, right?</p> <p>16 A. Right.</p> <p>17 Q. I want to ask you about another incident that happened when</p> <p>18 you were at the Palm Beach School of the Arts. Do you remember</p> <p>19 a time when you claim a teacher pulled your hair?</p> <p>20 A. Yeah.</p> <p>21 Q. You recall telling your mother about the teacher pulling</p> <p>22 your hair?</p> <p>23 A. Yes.</p> <p>24 Q. You recall your mother hiring a lawyer for you?</p> <p>25 A. I don't know that.</p>
<p>LC1VMAX5 Jane - cross Page 581</p> <p>1 A. Mr. Glassman.</p> <p>2 Q. At any point during your cooperation with the government,</p> <p>3 including testifying, you knew that your cooperation with the</p> <p>4 government, including testifying, would benefit you in your</p> <p>5 civil litigation against the Epstein estate and Ms. Maxwell;</p> <p>6 correct?</p> <p>7 A. No, I don't know that.</p> <p>8 Q. You knew that cooperation with the government, including</p> <p>9 testifying, would benefit you in your claim for the victims'</p> <p>10 compensation fund; correct?</p> <p>11 A. No, I don't know that.</p> <p>12 Q. Yesterday, you testified a bit about your inability to</p> <p>13 speak with your mother about what happened -- you say happened</p> <p>14 between you and Epstein; correct?</p> <p>15 A. Correct.</p> <p>16 Q. You testified that you and your mother did not have that</p> <p>17 kind of relationship, right?</p> <p>18 A. That's right.</p> <p>19 Q. You testified that you were raised in a household where you</p> <p>20 would be in trouble if you said something, right?</p> <p>21 A. Said something about what? Can you clarify?</p> <p>22 Q. Something personal.</p> <p>23 A. Something, yeah, that personal, yes.</p> <p>24 Q. And the effect on you is you felt you could not tell your</p> <p>25 mother about Epstein, right?</p>	<p>LC1VMAX5 Jane - cross Page 583</p> <p>1 Q. You recall you and your mother filing a lawsuit against</p> <p>2 your teacher?</p> <p>3 A. I didn't know that.</p> <p>4 Q. I'd like to show you a couple of exhibits. They've been</p> <p>5 marked for identification purposes as J-7 and J-9.</p> <p>6 I'd like to show you what's been marked for</p> <p>7 identification purposes, this J-7, second page. Does that</p> <p>8 refresh your recollection that you sued your teacher for</p> <p>9 pulling your hair on one occasion?</p> <p>10 A. No, I had no idea my mother did this.</p> <p>11 Q. I'm going to show you Exhibit J-10 -- I apologize, J-9.</p> <p>12 MS. MENNINGER: Your Honor, we have the original of</p> <p>13 this document present in the courtroom. This one is redacted</p> <p>14 for the name, but, if it's necessary, may I approach the</p> <p>15 witness?</p> <p>16 THE COURT: Show it to the government.</p> <p>17 Ms. Menninger.</p> <p>18 MS. MENNINGER: Your Honor, what we have is an</p> <p>19 original of a document that was certified. It's been marked --</p> <p>20 those two pieces have been marked J-8 and J-9. But they are</p> <p>21 combined as originals from the Court; it is one document.</p> <p>22 THE COURT: Okay.</p> <p>23 MS. MENNINGER: So I wanted the record to be clear</p> <p>24 what I would be showing the witness.</p> <p>25 THE COURT: You're showing her a combination of J-8</p>

LC1VMAX5	Jane - cross	Page 584	LC1VMAX5	Jane - cross	Page 586
1	and J-9.		1	would be the court exhibit, your Honor.	
2	MS. MENNINGER: Yes, your Honor, that are unredacted.		2	THE COURT: Right.	
3	THE COURT: Yes. Without objection, Ms. Moe?		3	MS. MOE: I object, your Honor, both on relevance and	
4	MS. MOE: No objection, your Honor.		4	foundation grounds.	
5	THE WITNESS: Okay.		5	THE COURT: I'll take a look at the document and then	
6	BY MS. MENNINGER:		6	we'll move on.	
7	Q. Does looking at that document refresh your recollection		7	MS. MENNINGER: Okay.	
8	about a lawsuit that you and your mother filed against your		8	THE COURT: Can I have the witness's copy?	
9	teacher?		9	Go ahead.	
10	A. No, I literally had no idea she did this.		10	MS. MENNINGER: Thank you, your Honor.	
11	Q. You recognize the name of the teacher --		11	BY MS. MENNINGER:	
12	A. Yes.		12	Q. You consider yourself an actor?	
13	Q. -- as the same person who was on your Interlochen		13	A. Yes.	
14	application we looked at earlier; correct?		14	Q. An actor plays the role of a fictional character --	
15	A. Yes.		15	A. Yes.	
16	MS. MOE: Objection, your Honor. We're now testifying		16	Q. -- for a living?	
17	about documents not in evidence.		17	A. Yes.	
18	THE COURT: That's true.		18	Q. An actor endeavors to effectively communicate the character	
19	I'll allow that question and then you're not going to		19	they are playing to an audience?	
20	do more. You asked if it refreshed her recollection. The		20	A. Yes.	
21	answer is clearly -- is no. She's answered the same way.		21	Q. Using their voice, body, actions, right?	
22	So let's go.		22	A. Yes.	
23	MS. MENNINGER: I'm a little unclear, your Honor. And		23	Q. An actor takes lines borrowed from a writer and uses those	
24	I don't know if we need a sidebar, because there are two other		24	lines to convincingly portray someone else in front of an	
25	names that -- without my saying them out loud to ask her if she		25	audience; correct?	
LC1VMAX5	Jane - cross	Page 585	LC1VMAX5	Jane - cross	Page 587
1	remembers who those persons are.		1	A. Yes.	
2	THE COURT: Well, so you want to point her somewhere		2	Q. Been an actor for a very long time?	
3	in the document and say, Do you recognize a name?		3	A. Yes.	
4	MS. MENNINGER: If I could -- I'll try to do it		4	Q. Since middle school?	
5	without naming the names because I don't know if that's a		5	A. Yes.	
6	problem.		6	Q. You performed numerous times as a teenager?	
7	THE COURT: Right.		7	A. More singing than acting, but yes.	
8	MS. MENNINGER: But on J-7, on the second page, they		8	Q. You traveled away from school to perform?	
9	are in the first paragraph. And I'm just going to direct the		9	A. Yes.	
10	witness to that line so that we can see the names.		10	Q. You performed around the state?	
11	BY MS. MENNINGER:		11	A. Yes.	
12	Q. Do you recognize the names of the persons in that first		12	Q. You competed internationally?	
13	paragraph?		13	A. This was all singing though, but yes.	
14	A. I remember my teacher, I remember the principal. I don't		14	Q. What?	
15	remember the guidance counsellor.		15	A. This was all singing, but yes.	
16	Q. And do you know whether you and your mother sued the		16	Q. You performed at a number of different venues?	
17	principal of your high school?		17	A. Yes.	
18	A. No, I don't. And we're friends on Facebook, so I had no		18	Q. You received coverage in the local newspapers; correct?	
19	idea that we even had an issue.		19	A. Yes.	
20	MS. MENNINGER: Your Honor, at this time I would offer		20	Q. Before you began your senior year of high school, you had a	
21	into evidence the originals of the document that is a combined		21	professional agent?	
22	document of Exhibits J-8 and J-9. I think the Court can take		22	A. Somewhere in the senior year, yes.	
23	judicial notice. They are certified copies.		23	Q. Before your senior year.	
24	THE COURT: You're moving J-8 and J-9?		24	A. I don't recall if it was before or during.	
25	MS. MENNINGER: Well, in the combined original exhibit		25	MS. MENNINGER: If we could show the witness	

<p>LC1VMAX5 Jane - cross Page 588</p> <p>1 Government Exhibit 761 at page 4. 2 THE COURT: It's been admitted? 3 MS. MENNINGER: Not yet, your Honor. I was just going 4 to use it to refresh. I believe there's a witness coming 5 today. 6 Q. Do you recognize that document? 7 A. Yes. 8 Q. You do? 9 A. Yes. 10 Q. And what is it? 11 A. Well, I actually don't -- can you go back to the first 12 page? I recognize that I wrote this. I don't know what the 13 document is. 14 Q. Okay. 15 A. Okay. Yes. 16 Q. And you see the date on there? 17 A. Yes. 18 Q. And that was before you were a senior? 19 A. Yes. 20 Q. And then if you go to page 4, you listed your agent; 21 correct? 22 A. Actually, that was a manager, that's why it was -- I didn't 23 remember. I had a manager, not an agent. 24 Q. But you got an agent in your senior year? 25 A. Yes.</p>	<p>LC1VMAX5 Jane - cross Page 590</p> <p>1 A. Yes. 2 Q. And you recently commemorated 20 -- 3 A. -- something years, yes. 4 Q. Twenty-something years on that show. 5 A soap opera is characterized by tangled interpersonal 6 situations, fair enough? 7 A. It's a very eloquent way to put it, I guess. 8 Q. And melodramatic are sentimental treatment of those 9 interpersonal situations, right? 10 A. Hopefully, not melodramatic, just dramatic. 11 Q. Your character has been involved in a number of different 12 plot lines over those 20-something years, fair? 13 A. Naturally, yes. 14 Q. You've played a protective mom? 15 A. Yes. 16 Q. You've been bullied? 17 A. Yes. 18 Q. You've battled cancer? 19 A. Yes. 20 Q. You've played a car crash victim? 21 A. I forgot about that one, but yes. 22 Q. Mental health issues? 23 A. Yes. 24 Q. You've been stalked by serial killers? 25 A. Yes.</p>
<p>LC1VMAX5 Jane - cross Page 589</p> <p>1 Q. You got a manager and an agent by your senior year? 2 A. Yes. 3 Q. All right. And you moved to New York for the purpose of 4 going to that high school here; correct? 5 A. Not to go to that high school. The high school wasn't a 6 performing arts school; it just was a private school. 7 Q. Professional Children's School? 8 A. Yes. It was for kids who were seeking professions in -- 9 entertainment professions. And if they booked a job, then the 10 school would work with them of sending them homework, but we 11 didn't do any arts in that school. 12 Q. I see. Thank you for that clarification. 13 And you did have work in your senior year; correct? 14 A. I did not, actually, not till after I graduated. 15 Q. Okay. You don't remember any school notes in which they 16 commented that you had been missing a lot of school because of 17 your work in your first quarter at that school? 18 A. They might have written those notes that I was working, but 19 I was not working. 20 Q. That you were working, but you weren't? 21 A. No, I was skipping school. 22 Q. Later in your -- after your senior year, you got this job 23 in Los Angeles, right? 24 A. Yes. 25 Q. And you moved to Los Angeles to work on the soap opera?</p>	<p>LC1VMAX5 Jane - cross Page 591</p> <p>1 Q. You played a prostitute? 2 A. Not my favorite storyline. 3 Q. You ran a restaurant? 4 A. Yes. 5 Q. You took down a Mexican drug cartel? 6 A. Yes. 7 Q. Essentially, there's no melodramatic role that you haven't 8 played? 9 A. If you want to call it melodramatic. I just say dramatic, 10 but yeah. 11 Q. It involves a significant amount of drama; correct? 12 A. Yes. 13 Q. You're able to cry on command? 14 A. No, not always. It's not really how it works. 15 Q. You express pain through your characters? 16 A. Yeah, of course. 17 Q. Vulnerability? 18 A. Yes. 19 Q. The job you've trained for for a long time, right? 20 A. Yes. 21 Q. You've been hired to work on other TV shows and series, 22 right? 23 A. Yes. 24 Q. A feature-length movie? 25 A. Yes.</p>

LC1VMAX5	Jane - cross	Page 592	LC1VMAX5	Jane - cross	Page 594
1 Q. Christmas specials, a wide range, right?			1 A. No, I said it was earlier in the summer.		
2 A. No Christmas special yet, I don't think, but yeah.			2 Q. Okay. So you thought you met him earlier in the summer?		
3 Q. You had a reality show we talked about a little while ago?			3 A. Yes.		
4 A. Unfortunately, yes.			4 Q. And then we talked about The Lion King, where you thought		
5 Q. Which was not real?			5 you were 14 when you saw the Broadway show, but then realized		
6 A. No, it's not real.			6 you were not; correct?		
7 Q. Your accusations in this case depend significantly on			7 A. Correct.		
8 you -- your memory that you were 14 when you met Epstein;			8 Q. It actually came out when you were 17; correct?		
9 correct?			9 A. Correct.		
10 A. Correct.			10 Q. Now, you recall meeting Mike Wallace of 60 Minutes fame in		
11 Q. You repeated it a number of times on the stand, right?			11 New York, right?		
12 A. Right.			12 A. Yes.		
13 Q. Well, actually, when you first met with the government, you			13 Q. And you believed that you were 15 when you met him?		
14 told them that you were 13 when you met Epstein, right?			14 A. I don't remember.		
15 A. No, I said I might have been 13 going on 14; because my			15 Q. You met him with Epstein, I should clarify, right?		
16 birthday is in August, and I believe I met them earlier in the			16 A. Yes.		
17 summer. So it was just a small technicality, I guess.			17 Q. And your first meeting with the government -- I'll have you		
18 Q. Well, in your civil complaint in the first paragraph, you			18 look at 3509-001 on page 5 in the middle of the page.		
19 said it all started in 1994, when 13-year-old Jane met Epstein			19 A. I see it.		
20 and Maxwell; correct?			20 Q. And you told the government about meeting Mike Wallace?		
21 A. Correct. I was 13 in June and July.			21 A. Yes.		
22 Q. You didn't say "13, going on 14."			22 Q. And that was Mike Wallace's 80th birthday party; correct?		
23 A. I don't know. I don't know.			23 A. I think so.		
24 Q. Okay. Do you want to take a look at 3509-007, paragraph 1.			24 Q. And you came in and said happy birthday to Mr. Wallace;		
25 A. Okay.			25 correct?		
LC1VMAX5	Jane - cross	Page 593	LC1VMAX5	Jane - cross	Page 595
1 Q. And there you just said you were 13, right?			1 A. I sang Happy Birthday, yes.		
2 A. It says there that I'm 13, yeah.			2 Q. And that's when you were 15?		
3 Q. And that was what was filed by your attorney in court?			3 A. I'm not sure. That's why it says approximately. I		
4 A. Yes.			4 couldn't remember, and I don't know how old Mike Wallace was		
5 Q. And you told the government 13, but later they refreshed			5 when --		
6 your memory that maybe you were 14, right?			6 Q. Okay.		
7 A. No, I always from the beginning said 13, but I turned 14			7 A. -- is now or he's passed away.		
8 that summer.			8 Q. He has passed away.		
9 Q. Okay. I'll have you take a look at 3509-008, page 11. And			9 A. Passed away.		
10 looking at that, do you recall the government asking you --			10 Q. You recall it being his 80th birthday party though;		
11 THE COURT: Where?			11 correct?		
12 MS. MENNINGER: I apologize. The second from the --			12 A. Yes.		
13 second full paragraph from the bottom up.			13 Q. Okay. And you don't know what his birthday is, I think you		
14 Q. Does that refresh your recollection about a conversation			14 just said; correct?		
15 you had with the government?			15 A. No, I don't know.		
16 A. No, because I didn't write any of this. The second half of			16 Q. If I can have you take a look at J-33, on the right side.		
17 that makes sense, which is I was probably 13. And it says here			17 Do you have any reason to believe that that birthday is		
18 that I turned 14 that summer.			18 incorrect?		
19 Q. So you were not asked if it was possible that you met			19 MS. MOE: Objection.		
20 Epstein after you turned 14?			20 THE COURT: Sustained.		
21 A. I don't remember.			21 Q. Does it refresh your recollection?		
22 Q. But I understand now you're saying you believe you were 14			22 MS. MOE: Objection.		
23 because it was later in the summer, right?			23 THE COURT: Sustained. No basis for refreshing.		
24 A. What was later in the summer?			24 Q. It's true that Mike Wallace's birthday party, 80th birthday		
25 Q. When you met Epstein.			25 party, was in May of 1998; correct?		

<p>LC1VMAX5 Jane - cross Page 596</p> <p>1 MS. MOE: Objection. 2 THE COURT: Overruled. 3 A. I don't remember. 4 Q. You might have been 15 or it might have been some other 5 date, right? 6 A. Right. 7 Q. You moved to New York in or around 1998, right? 8 A. Yes. 9 Q. And you went to your senior year here from '98 to '99? 10 A. Yes. 11 Q. What you put in your civil complaint is that you moved to 12 New York in 1996 to go to school here; correct? 13 A. I don't remember saying that. 14 Q. Let's go back to 3509-007, paragraph 20. And in your civil 15 complaint, you alleged that you moved to New York in 1996 when 16 you were 16; correct? 17 A. No, I don't think I said that, because I didn't move to New 18 York then. 19 Q. Do you want to look at the first page of this? 20 A. No, I -- I know. I know what it is. 21 Q. You know your lawyer signed it? 22 A. Yes. 23 Q. The lawyer that you met with the government with multiple 24 times, right? 25 A. Yes.</p>	<p>LC1VMAX5 Jane - cross Page 598</p> <p>1 correct? 2 A. I don't see a date. 3 Q. On the last page. Sorry. I forgot you didn't have -- 4 A. Yes. 5 Q. And in June of 2020, you answered, through your attorney, 6 interrogatories, right? 7 A. Right. 8 Q. And interrogatory number nine, if I could have you turn to 9 that, on page 4, asked you to identify all persons other than 10 decedent, Mr. Epstein, who have ever committed or attempted to 11 commit sexual misconduct or offenses against or otherwise 12 concerning you, including, without limitation, any unwelcome 13 behavior of a sexual nature, sexual abuse, sexual assault, 14 threats or intimidation of a sexual nature or sexual 15 exploitation, regardless of whether the misconduct or offenses 16 involved physical touching, and you responded none. Correct? 17 MS. MOE: Objection. 18 THE COURT: Are you moving this? 19 MS. MENNINGER: Yes, your Honor, this interrogatory. 20 MS. MOE: Your Honor, I think the record is that this 21 witness doesn't recognize it, doesn't know anything about it, 22 and so for that reason we'd object. 23 MS. MENNINGER: Your Honor, it's a legally binding 24 document. 25 THE COURT: Can I see the whole document?</p>
<p>LC1VMAX5 Jane - cross Page 597</p> <p>1 MS. MENNINGER: If I could have one moment, your 2 Honor. 3 THE COURT: You may. 4 (Counsel conferred) 5 BY MS. MENNINGER: 6 Q. In this civil case -- just a moment. 7 In your civil case, you were given something called 8 interrogatories. Do you know what those are? 9 A. No. 10 Q. They are questions for you to answer under oath. Does that 11 ring a bell? 12 A. No. 13 Q. Do you recall answering any questions under oath? 14 A. No. 15 Q. Do you know what your lawyer put down as your answers under 16 oath to any particular questions? 17 A. No. 18 Q. I'm going to show you a document that we have marked as 19 J-15. I have one that's redacted, but if you would like to see 20 the entire document, just let us know. We have that available. 21 Do you recognize the caption on this case? 22 A. Yes. 23 Q. Is this your lawsuit that you filed? 24 A. Yes. 25 Q. And this is signed by your attorney in June of 2020;</p>	<p>LC1VMAX5 Jane - cross Page 599</p> <p>1 MS. MENNINGER: Yes, your Honor. 2 THE COURT: Are you making an authentication 3 objection? 4 MS. MOE: Your Honor, it's about relevance and 5 personal knowledge. She's being asked about -- 6 THE COURT: Yes, I understand. 7 MS. MOE: Thank you. 8 THE COURT: Overruled. 9 J-15 is admitted. 10 (Defendant's Exhibit J-15 received in evidence) 11 MS. MENNINGER: Thank you. No further questions. 12 (Continued on next page) 13 14 15 16 17 18 19 20 21 22 23 24 25</p>



LC1Qmax6	Jane - Redirect	Page 600	LC1Qmax6	Jane - Redirect	Page 602
1	THE COURT: Let me just ask about J-8, the combined		1	Q. Did you take any notes during the meetings?	
2	J-8 and J-9. I'll overrule the objection, and it's admitted.		2	A. No.	
3	MS. MENNINGER: Thank you, your Honor.		3	Q. Who took the notes?	
4	(Defendant's Exhibits J-8 and J-9 received in		4	A. I don't know.	
5	evidence)		5	Q. Did you have any opportunity to review any notes or reports	
6	THE COURT: Redirect.		6	of any meetings for accuracy?	
7	MS. MOE: Thank you, your Honor.		7	A. No.	
8	REDIRECT EXAMINATION		8	Q. And before Ms. Menninger showed you some notes during your	
9	BY MS. MOE:		9	cross-examination, had you ever seen any of that before?	
10	Q. Since we were just talking about Defendant's Exhibits J-15,		10	A. No.	
11	I just want to be clear, do you recognize this document?		11	Q. In your conversations with prosecutors, were there times	
12	A. I don't have a document in front of me. Which one, this		12	when we asked you about additional details of your experiences	
13	last one?		13	in followup meetings?	
14	Q. Yes.		14	A. Yes.	
15	A. No.		15	Q. Did we discuss every topic at every meeting?	
16	Q. Did you write this?		16	A. No.	
17	A. No.		17	Q. I want to back up and ask you about your first meetings	
18	MS. MOE: Your Honor, may I proceed?		18	with the government.	
19	THE COURT: Yes.		19	Can you explain for the jury, was it difficult to talk	
20	MS. MOE: Thank you.		20	to the government in your first meetings?	
21	Q. Jane, you were asked questions on cross-examination about		21	A. Yes, absolutely.	
22	your meetings with the government. Do you remember being asked		22	Q. Why was that difficult?	
23	about that?		23	A. Because I was sitting in a room full of strangers and	
24	A. Yes.		24	telling them the most shameful, deepest secrets that I'd been	
25	Q. And you were asked about your meetings with me. Do you		25	carrying around with me my whole life.	
LC1Qmax6	Jane - Redirect	Page 601	LC1Qmax6	Jane - Redirect	Page 603
1	remember being asked about that?		1	Q. In those first meetings, were you able to share with the	
2	A. Yes.		2	government all of the details of what had happened to you?	
3	Q. And you were asked about whether in your meetings with the		3	A. No.	
4	government you were asked about the questions that I was going		4	Q. Why was that?	
5	to ask you on direct examination. Do you remember being asked		5	A. Because it was too difficult, too difficult emotionally,	
6	about that?		6	too difficult on every level.	
7	A. Yeah.		7	Q. Over time, did you become more comfortable sharing the	
8	Q. Did I or any other prosecutor ever tell you what to say on		8	details about what happened to you with the government?	
9	the witness stand at this trial?		9	A. Yes.	
10	A. No.		10	Q. Why was that?	
11	Q. What did we tell you to do?		11	A. Because I guess I became more familiar with the people	
12	A. Just tell the truth.		12	sitting in front of me, and starting to feel like I could trust	
13	Q. Has anyone told you what to say at this trial?		13	them, and it didn't feel quite as embarrassing.	
14	A. No.		14	Q. Did there come a point in your meetings with the government	
15	Q. You were asked some questions on cross-examination about		15	where fewer people were in the room?	
16	notes of meetings with the government. Do you remember being		16	A. Yes.	
17	asked about that?		17	Q. And did you have an understanding at the time about why in	
18	A. Yes.		18	your meetings with the government there started to be fewer	
19	Q. I want to ask you about your meetings with the government.		19	people in the room?	
20	When you met with the FBI and the government, did you cover		20	A. I believe it was to make me more comfortable.	
21	every detail of your entire relationship with Maxwell and		21	Q. And how did you feel once you started having meetings with	
22	Epstein in every meeting with the government, or did you talk		22	the government with fewer people in the room?	
23	about different topics at different times at different		23	A. It started feeling easier.	
24	meetings?		24	Q. I want to ask you about your last few meetings with the	
25	A. Different topics, different times, different meetings.		25	government leading up to the trial. During those meetings in	

LC1Qmax6	Jane - Redirect	Page 604	LC1Qmax6	Jane - Redirect	Page 606
1	the last few months, was your attorney present?		1	discussed, that three-bedroom house. My sister was the one who	
2	A. No.		2	rented it for us.	
3	Q. In general, who was in the room?		3	Q. Approximately when did you move out of the pool house and	
4	A. Just me and you guys.		4	into the three-bedroom house?	
5	Q. You were asked some questions on cross-examination about		5	A. We moved out of the pool house in, I think, spring of '96.	
6	your living situation when you were in middle school and high		6	Wait. Sorry. I'm tired. The spring of '95. Sorry.	
7	school living in Palm Beach. Do you remember those questions?		7	Q. Do you recall being asked some questions on	
8	A. Yes.		8	cross-examination about whether you traveled internationally	
9	Q. So I just want to ask you about where you were living at		9	when you were in high school?	
10	the time. In the summer of 1994, when you first met Maxwell		10	A. Yes.	
11	and Epstein, where were you living?		11	Q. Just to be clear, did those trips have anything to do with	
12	MS. MENNINGER: Objection. Leading, your Honor.		12	Maxwell and Epstein?	
13	THE COURT: Overruled. You may answer.		13	A. No.	
14	A. That summer we were still living on Palma Way at my		14	Q. Without discussing any specifics about your family members,	
15	mother's friend, Joan, in her pool house in her back yard, and		15	do you have some family members who live abroad?	
16	we -- when we came home from camp that summer, we were still		16	A. Yes, that's -- the country that we would travel to, that's	
17	living in that place.		17	where we were from, and any time those dates that were	
18	Q. Did your family struggle financially during the years that		18	discussed earlier, that would be a family trip home.	
19	you were in high school?		19	Q. Do you recall being asked on cross-examination questions	
20	A. Yes.		20	about whether you had ever talked to a reporter?	
21	Q. Was there ever a time when you and your brothers had a hard		21	A. Yes.	
22	time paying for lunch at school?		22	Q. And you were asked about whether you made a statement to a	
23	MS. MENNINGER: Objection, your Honor. 403.		23	tabloid about what had happened to you with Jeffrey Epstein.	
24	THE COURT: Overruled. You may answer.		24	Do you remember being asked about that?	
25	A. Yes.		25	A. Yes.	
LC1Qmax6	Jane - Redirect	Page 605	LC1Qmax6	Jane - Redirect	Page 607
1	Q. Can you tell the jury what you remember about that?		1	Q. Can you please explain for the jury what were the	
2	A. I mean, I remember my mother never had any money. She		2	circumstances under which a reporter approached you?	
3	didn't work, so she didn't have money to really pay for		3	A. Well, it was a reporter who called me and said --	
4	anything. We had food stamps that she refused to use because		4	MS. MENNINGER: Objection. Hearsay, your Honor.	
5	her pride was too big, and she would sort of, you know,		5	A. Okay. Sorry.	
6	scrounge for quarters, and sometimes I would give my brothers		6	MS. MOE: I'm happy to rephrase, your Honor.	
7	my lunch money and pretend like I had some so that they could		7	THE COURT: Go ahead.	
8	eat.		8	Q. When you had that conversation with the reporter, did you	
9	Q. Did your family's financial circumstances improve after you		9	want to have that conversation?	
10	met Maxwell and Epstein?		10	A. No.	
11	A. But -- no.		11	Q. Why did you agree to speak to that reporter?	
12	Q. Did Jeffrey Epstein help your family financially?		12	A. Because he basically blackmailed me.	
13	A. In some ways, yes.		13	MS. MENNINGER: Objection, your Honor. Hearsay.	
14	Q. Can you describe for the jury the ways that Jeffrey Epstein		14	THE COURT: Overruled. Go ahead.	
15	helped your family financially?		15	A. He said that he -- that court documents with my name on it	
16	A. Well, he -- he handed me cash. He gave us a computer. He		16	were unredacted, and that the Epstein's little black book was	
17	paid for some school stuff. He -- he paid for Interlochen Arts		17	out, and my name was in it, and he was going to print --	
18	Camp for the next two summers. He paid for my younger		18	MS. MENNINGER: Objection, your Honor. Hearsay.	
19	brother's Interlochen Arts Academy his entire year at boarding		19	THE COURT: We'll limit what the witness has testified	
20	school. Gave us gifts. And, you know, so on and so forth.		20	to as not being offered for the truth of what was stated by	
21	Q. Did there come a time when your family moved out of the		21	someone else but the effect on the listener.	
22	pool house?		22	And let's re-narrow the question.	
23	A. Yes.		23	MS. MOE: Yes, your Honor. May I ask a leading	
24	Q. And where did you move to?		24	question to navigate through this?	
25	A. That's when we moved to that second house that was first		25	THE COURT: Let me hear the question.	

LC1Qmax6	Jane - Redirect	Page 608	LC1Qmax6	Jane - Redirect	Page 610
1	Q. When you spoke with that reporter, did that reporter		1	him.	
2	threaten to reveal your identity publicly if you wouldn't speak		2	Q. You were asked some questions on cross-examination about	
3	with him?		3	your applications for admission to Interlochen. Do you	
4	A. Yes.		4	remember those questions?	
5	Q. Is that why you spoke with the reporter?		5	A. Yes.	
6	A. Yes.		6	Q. I'd like to just ask you a few questions about those	
7	Q. Did you make an agreement with the reporter in order to		7	particular applications.	
8	make sure your identity wasn't revealed?		8	A. Okay.	
9	A. Yes.		9	MS. MOE: If I could just have a moment, I'm going to	
10	Q. And what was that agreement?		10	grab a copy of them.	
11	A. The agreement was to briefly discuss only how I had met		11	Your Honor, I'd ask for permission for the witness and	
12	Jeffrey Epstein.		12	the jurors to view Defendant's Exhibit J-3 which I believe is in	
13	Q. And in exchange for doing that, what did the reporter agree		13	evidence under seal.	
14	to do?		14	THE COURT: Let me just verify. Yes.	
15	A. He promised to keep my name anonymous.		15	MS. MOE: Thank you, your Honor. May the jurors turn	
16	Q. Did the reporter keep your name anonymous?		16	to that in their binders?	
17	A. Yes.		17	Ms. Menninger, without objection?	
18	Q. Was that important to you at the time?		18	MS. MENNINGER: Yes, your Honor.	
19	A. Yes.		19	THE COURT: Jurors, you may pick up your binder and	
20	Q. Why was that so important to you?		20	turn to J-3, correct?	
21	A. It was important because I was -- I was scared. I was		21	Q. Jane, do you have that up in front of you?	
22	embarrassed, ashamed. I didn't want anybody to know any of		22	A. Yes.	
23	this about me. I wanted to stay out of it. I -- I'm working		23	Q. Just to be clear, what we're talking about is Defendant's	
24	on a TV show, and I didn't want everybody to know that that was		24	Exhibit J-3, your application for admission to Interlochen for	
25	me and associate me with any of this, and so I desperately did		25	the summer of 1994?	
LC1Qmax6	Jane - Redirect	Page 609	LC1Qmax6	Jane - Redirect	Page 611
1	whatever I had to do to make sure that he didn't reveal my		1	A. Yes.	
2	name.		2	Q. How old were you when you applied to go to Interlochen in	
3	Q. What were you scared of?		3	1994?	
4	MS. MENNINGER: Objection, your Honor. Asked and		4	A. 13.	
5	answered.		5	Q. I want to ask you about a few things on this application.	
6	THE COURT: Sustained.		6	But when I do, I just want to be careful we are not reading	
7	Q. Approximately how long was that conversation with the		7	anything into the record that's identifying about you.	
8	reporter?		8	If we could turn to the second page of that	
9	A. I don't remember.		9	application, and directing your attention to the second section	
10	Q. Was it in person?		10	towards the bottom, do you remember Ms. Menninger asking you	
11	A. No. It was in my car on the side of the road with my phone		11	questions about whether you told Interlochen you were having	
12	plugged in.		12	any difficulties?	
13	Q. Was that a phone conversation or an in-person conversation		13	A. I don't remember.	
14	in your car?		14	Q. Let me just be clear about this portion of the application.	
15	A. Just a phone conversation.		15	I want to direct your attention to the portion of the middle	
16	Q. Was it a detailed conversation?		16	section that says: List two difficult works performed in	
17	A. I tried to make it not so detailed.		17	orchestra, band or ensemble within the past year. Do you see	
18	Q. You were asked some questions on cross-examination about		18	that question?	
19	your attorney, Robert Glassman. Do you remember those		19	A. Yes.	
20	questions?		20	Q. Is that the question you answered: Nothing has been	
21	A. Yes.		21	difficult for me?	
22	Q. Can you just explain for the jury without getting into any		22	A. I guess I did.	
23	privileged conversations, how did you find this attorney?		23	Q. And what did you mean when you said that?	
24	A. He was a referral. Actually, he's friends with my		24	A. I have no idea.	
25	husband's best friend, and I met with him, and I just liked		25	Q. At the time, were you fairly talented?	

LC1Qmax6	Jane - Redirect	Page 612	LC1Qmax6	Jane - Redirect	Page 614
1	A. Yes, and very cocky, apparently.		1	THE COURT: You may.	
2	Q. Just to be clear, nowhere in this application did you say		2	MS. MOE: Thank you, your Honor.	
3	you weren't having any difficulties at home, right?		3	THE COURT: J-4 for the jurors.	
4	A. No.		4	BY MS. MOE:	
5	Q. Were you having difficulties at home during this time?		5	Q. On this application, I want to ask you about that same	
6	A. Absolutely, yes.		6	section about the applicant information?	
7	Q. You were asked some questions about the recommendation		7	A. Mmm-hmm.	
8	letters in your applications to Interlochen. Do you remember		8	Q. Directing your attention to that same line, by the next	
9	those questions?		9	year in 1995, how tall were you by then?	
10	A. Yes.		10	A. It says I was five-four.	
11	Q. And you were asked about whether your recommenders talked		11	MS. MENNINGER: Objection, your Honor. It misstates	
12	about your family in a favorable light. Do you remember those		12	the date on the document. The date on the document is not what	
13	questions?		13	was just represented by counsel.	
14	A. Yes.		14	THE COURT: Ms. Moe, go ahead.	
15	Q. The people who you asked to recommend you for Interlochen,		15	BY MS. MOE:	
16	did they know what was going on in your house at home?		16	Q. In your application for the next year at summer camp, how	
17	A. No.		17	tall were you by then?	
18	Q. Why was that?		18	A. It says I was five-four.	
19	A. Because we were very good at hiding what was going on at		19	Q. You'd grown two inches?	
20	home, and these recommendation letters are basically just from		20	A. I don't know, I may have been fibbing.	
21	our school teachers.		21	Q. What grade were you in by then?	
22	Q. I want to ask you one last question about this application.		22	A. Eighth grade.	
23	If you could turn back to the first page of Defendant's Exhibit		23	Q. Do you recall defense counsel asking you about Government	
24	J-3. And I want to focus your attention at the top section		24	Exhibit 761 and whether that was your application to the	
25	with applicant information. You see a few lines down, there's		25	Professional Children's School?	
LC1Qmax6	Jane - Redirect	Page 613	LC1Qmax6	Jane - Redirect	Page 615
1	a line that starts F, above sex, M or F?		1	A. I'm sorry, I don't know what that means.	
2	A. I'm sorry, I'm having a hard time finding it. Where is it?		2	Q. Do you remember being shown a document on cross-examination	
3	Q. So, in the very -- I'm looking in the first page of		3	and being asked about whether that was your application to the	
4	Defendant's Exhibit J-3 in the top header, the very first top		4	Professional Children's School?	
5	of the document under applicant information, do you see about		5	A. Yes.	
6	five lines down underneath the names of your siblings, the line		6	Q. And did you recognize that document as your application to	
7	there?		7	the Professional Children's School?	
8	A. Yes. Yes. Sorry.		8	A. No.	
9	Q. In your application, did you have to list your height and		9	Q. Do you recognize the handwriting on that document?	
10	weight?		10	A. Is it here? Can I see it or --	
11	A. Yes.		11	Q. That's all right. I can move on.	
12	Q. And how tall were you when you were going to summer camp		12	A. Okay.	
13	that summer?		13	Q. You were asked some questions on cross-examination about	
14	A. Five-two.		14	your career as an actor. Do you remember being asked about	
15	Q. How many pounds did you weigh?		15	that?	
16	A. 90.		16	A. Yes.	
17	Q. What grade were you in?		17	Q. Do you know the difference between acting on television and	
18	A. Seventh grade.		18	testifying in court?	
19	Q. I want to ask you about the next year you went to		19	A. Yes.	
20	Interlochen. If you could turn to --		20	Q. What's the difference?	
21	MS. MOE: I'd ask for permission for the jurors to		21	A. Acting on television is not real, and testifying in court	
22	turn to Defendant's Exhibit J-4 which is in evidence under		22	is real, is the truth.	
23	seal.		23	Q. Are you acting here today?	
24	THE COURT: Without objection, you may.		24	A. No.	
25	MS. MENNINGER: Yes, your Honor.		25	Q. What are you here to do?	

LC1Qmax6	Jane - Redirect	Page 616	LC1Qmax6	Jane - Redirect	Page 618
1	A. I am here to hopefully finally find some sort of closure to		1	A. Well, the first time was Ghislaine.	
2	all of this. This is something that I have been running from		2	Q. Why does that stand out to you in your memory?	
3	my entire life up until now, and I'm just tired of it, and I		3	A. Because it was just significant. It's when that sort of	
4	was just hoping that I could help in any way to make that		4	like fun, casual relationship I had with her just changed.	
5	happen and to hopefully find some peace and healing some day.		5	Q. When you say the first time, when you talk about first	
6	Q. I want to ask you a few more questions about the summer of		6	times, what do you mean by that?	
7	1994. About how many weeks were you at summer camp that		7	A. Meaning that the first time I was ever like unclothed with	
8	summer?		8	just the both of them.	
9	A. Eight weeks.		9	Q. You were asked a lot of questions on cross-examination	
10	Q. Were there weeks when you were at summer camp that summer		10	about first and first times. Do you remember those questions?	
11	when you were 13?		11	A. I think so.	
12	A. Yes.		12	Q. Fair to say there were a lot of firsts for you when you	
13	Q. Were there weeks when you were in summer camp that summer		13	were 14 and 15 and 16 with Maxwell and Epstein?	
14	when you were 14?		14	MS. MENNINGER: Objection. Leading, your Honor.	
15	A. Yes.		15	THE COURT: Sustained.	
16	Q. Is your birthday in the summer?		16	MS. MOE: Your Honor, if I could just have one moment.	
17	A. Yes.		17	THE COURT: Okay.	
18	Q. Do you remember which week of summer camp you met Ghislaine		18	(Pause)	
19	Maxwell and Jeffrey Epstein?		19	MS. MOE: Thank you very much.	
20	A. No.		20	BY MS. MOE:	
21	Q. How strong is your memory of meeting Ghislaine Maxwell and		21	Q. I want to ask you about just one last topic. You were	
22	Jeffrey Epstein at summer camp in 1994?		22	asked some questions on cross-examination about the award you	
23	A. Pretty strong.		23	received from the Epstein Victims' Compensation Fund. Do you	
24	Q. Why is that memory pretty strong?		24	remember being asked on cross-examination about that?	
25	A. Because it was the beginning of when my life would change		25	A. Yes.	
LC1Qmax6	Jane - Redirect	Page 617	LC1Qmax6	Jane - Redirect	Page 619
1	forever.		1	Q. To be clear, would you give that money back if it meant	
2	Q. You were asked on cross-examination about your memories of		2	that you weren't abused as a kid?	
3	being sexually abused. Do you remember those questions?		3	MS. MENNINGER: Objection. Leading, your Honor.	
4	A. Yes.		4	THE COURT: Sustained.	
5	Q. How old were you when you first touched Jeffrey Epstein's		5	Q. Jane, in your own words, can you tell the jury what that	
6	penis?		6	money meant to you?	
7	A. 14.		7	A. Sorry.	
8	Q. Can you describe for the jury how you touched his penis		8	Q. It's all right. Take your time.	
9	when you were 14?		9	A. I mean, it -- oh, I wish I would have never received that	
10	MS. MENNINGER: Your Honor, this exceeds the scope of		10	money in the first place because of what happened. You know,	
11	cross. I didn't ask this question.		11	when you're seeking some sort of closure, and I guess in, you	
12	MS. MOE: Your Honor, I believe there were questions		12	know, laws in this country, compensation is the only thing you	
13	on cross-examination about whether she remembers details how		13	can get to try to move on with your life and for the, you know,	
14	strong those memories are.		14	pain and abuse and suffering that I received, and all the	
15	THE COURT: Overruled.		15	out-of-pocket money I paid to try to make this go away and to	
16	MS. MOE: Thank you, your Honor.		16	try to fix myself.	
17	THE COURT: You may answer.		17	MS. MENNINGER: Objection. Narrative, your Honor.	
18	A. I mean, how do you touch a penis, you put your hand around		18	THE COURT: Overruled.	
19	it?		19	A. So, you know, hopefully this just puts it all to an end,	
20	Q. And what would you do when you touched his penis when you		20	and I can move on with my life.	
21	were 14?		21	Q. Do you have any financial stake in the outcome of this	
22	A. Umm, masturbate him?		22	trial?	
23	Q. Who would give you instructions about what to do during		23	A. No.	
24	incidents when Jeffrey Epstein sexually abused you when you		24	MS. MOE: Nothing further, your Honor.	
25	were 14?		25	THE COURT: Okay. Ms. Menninger.	

LC1Qmax6	Jane - Redirect	Page 620	LC1Qmax6	Jane - Redirect	Page 622
1	MS. MENNINGER: No recross. Thank you.		1	example would be, his 3500 material is that she said that	
2	THE COURT: Thank you, Jane. You may step down. You		2	Ms. Maxwell brought girls. There was no testimony to that.	
3	are excused.		3	There was testimony that there were women, but not	
4	(Witness excused)		4	that she brought them. There was testimony of her presence,	
5	THE COURT: Members of the jury, we will take our		5	but not necessarily that she told the group that everything	
6	mid-afternoon break. Your snacks are here. We will break for		6	would be okay.	
7	about 15 minutes. Thank you.		7	That's the kind of statements that are in the 3500	
8	(Jurors not present)		8	material. And I have addressed this with Ms. Moe. We're not	
9	THE COURT: You may be seated.		9	entirely sure how it will come out, but it isn't a prior	
10	Matters to take up before the break?		10	consistent statement. There is a prior conversation or	
11	MS. MOE: Not from the government, your Honor.		11	discussion, but the statements themselves are not consistent.	
12	MS. STERNHEIM: I have a matter, Judge. I believe the		12	THE COURT: Ms. Moe.	
13	next witness is Matt, whose issue was teed up yesterday. In		13	MS. MOE: Your Honor, I believe the Court's ruling on	
14	advance of his testimony, just to make sure that it is		14	this is that we would evaluate the statements as they come out	
15	compliant with the Federal Rules of Evidence, I would request		15	through the witness. And as a preview, after conferring with	
16	that the government give a proffer of what he is going to say,		16	Ms. Sternheim on this issue, we did confer with Matt and asked	
17	as there are things in his 3500 material that did not come out		17	him about what he recalls, specifically about the woman he	
18	on direct examination, and it would be improper for him to be		18	recalls Jane telling him. Again, it's always difficult to	
19	able to testify as to things that are not prior consistent		19	predict the precise testimony of a lay witness, but my general	
20	statements.		20	expectation is that he would explain that in conversations with	
21	THE COURT: There are things in his 3500 material that		21	Jane, she explained that there was a woman at the house who	
22	the previous witness said to him --		22	made her feel comfortable; that sometimes there was that woman	
23	MS. STERNHEIM: Yes.		23	at the house, sometimes there were girls; and so that made her	
24	THE COURT: -- that were not asked about of the		24	feel comfortable in the house.	
25	witness.		25	I don't expect that the testimony would go beyond	
LC1Qmax6	Jane - Redirect	Page 621	LC1Qmax6	Jane - Redirect	Page 623
1	MS. STERNHEIM: Right.		1	that, but again, we're talking about a number of conversations	
2	THE COURT: Okay. Can you confer?		2	during this time period. That's my current expectation. But I	
3	MS. MOE: Yes, your Honor.		3	think with respect to I think some of the granular issues, the	
4	THE COURT: During the break?		4	difference between woman and girls, I think, especially in this	
5	MS. STERNHEIM: Of course.		5	context is not so different that it would not be a prior	
6	THE COURT: Great. I appreciate you raising it, and		6	consistent statement. And beyond that, your Honor, we think	
7	let me know if there's disagreement. Thank you.		7	this tracks the rule.	
8	MS. STERNHEIM: Will do.		8	MS. STERNHEIM: Judge, I disagree. The distinction	
9	THE COURT: We'll break for ten.		9	between a girl and a woman is precisely what this case is	
10	(Recess)		10	about, and she was very clear that she felt like she was the	
11	(Jurors not present)		11	only one. The other people were women.	
12	THE COURT: Matters to take up?		12	THE COURT: She said she didn't know what their ages	
13	MS. MOE: Not from the government your Honor.		13	were.	
14	MS. STERNHEIM: Just very briefly, Judge. I did have		14	MS. STERNHEIM: She didn't know their ages, but she	
15	an opportunity to confer with Ms. Moe. I just want to state		15	did not refer to them as girls.	
16	for the record, with regard to the introduction of prior		16	THE COURT: But wasn't the recent testimony, I think	
17	consistent statements, it is my understanding that there needs		17	it was on cross, which was: Were there underage girls. And	
18	to be a similar exactitude as one would have with prior		18	she said, "I wouldn't know the ages."	
19	inconsistent statements, and I understand that the government		19	MS. STERNHEIM: That's fine, but to call them girls	
20	is offering their next witness, Matt, to establish the fact		20	connotes that they are minors, and that parlays right into the	
21	that there was some colloquy discussion between Matt and Jane		21	government's theory of the case, and they're bringing it out	
22	at an earlier time before this. I have no problem with that.		22	through a witness whose sole purpose is substantiated prior	
23	The issue is that, at least in the 3500 material, the		23	consistent statement, and that is not consistent with the	
24	statements that Matt made are not -- they don't dovetail		24	testimony that we've heard.	
25	entirely with what went on on the direct examination. One		25	If he wants to say there were prior women, I can't	

LC1Qmax6	Jane - Redirect	Page 624	LC1Qmax6	Jane - Redirect	Page 626
1	make objection to that, but I do object to the term girls, and		1	direct that Ms. Maxwell brought women. There were women there	
2	I do object to other aspects of his 3500 material insofar as		2	but not that she brought them, and I think that Ms. Menninger	
3	there was no testimony, and this witness should not be used to		3	cleared that up on cross-examination as well.	
4	supplant what the primary witness did not testify about.		4	THE COURT: Okay.	
5	THE COURT: I agree with you on that distinction.		5	MS. MOE: Your Honor, particularly, if I'm permitted	
6	This witness can't testify as a prior consistent statement that		6	to ask leading questions, I wouldn't expect to ask that	
7	Jane told him that there were -- I mean, there's ambiguity in		7	particular question.	
8	the term, but I think since the witness couldn't testify if		8	THE COURT: Okay. You won't ask it, it sounds like.	
9	they were underage or not, I can't allow the witness to make		9	MS. MOE: Yes, your Honor.	
10	that as an implication since that implication wouldn't be		10	MS. STERNHEIM: Thank you Judge.	
11	consistent with the testimony.		11	THE COURT: Okay. Thank you. Anything else?	
12	MS. MOE: Yes, your Honor. I think on this point, to		12	MS. MOE: Your Honor, very briefly, I just wanted to	
13	be clear, the government doesn't intend to argue in closing		13	clarify because I believe in briefing the subject of prior	
14	that the jury must infer from the evidence that there were		14	consistent statements, defense counsel had raised the prospect	
15	underage girls in the room because of Matt's testimony. I		15	of recall of the witness. So I just wanted to make sure in	
16	think it is, unfortunately, common that often women above the		16	terms of our contacts with Jane, we had clarity on that status.	
17	age of 18 are referred to as girls. That's how he remembers		17	THE COURT: Yes. And I didn't hear it from anyone on	
18	it.		18	the 615 issue on the timing that I said, so I assumed you	
19	I would be happy to lead him through that testimony,		19	worked that out, correct?	
20	if the Court would prefer, and use the term females. It's not		20	MR. ROHRBACH: Yes, your Honor. Our understanding is	
21	our intention to elicit the testimony to suggest anything in		21	that none of the witnesses who are testifying as victims are	
22	particular about the ages of those folks, but that's how he		22	intending to observe any of the trial until at least both sides	
23	remembers it, and that's the word he uses.		23	have rested, which we've conveyed to the defense, and we	
24	THE COURT: Why don't you -- I'll let you lead, but		24	understand there would be no objection to that.	
25	why don't you just say other people, or something like that.		25	THE COURT: So then the open question is might there	
LC1Qmax6	Jane - Redirect	Page 625	LC1Qmax6	Jane - Redirect	Page 627
1	MS. MOE: If I ask him about that, I do expect he		1	be recall that would prohibit the government from conferring	
2	would say, yes, other girls. And so I think unless it's a		2	with a witness who's completed their testimony?	
3	leading question, I just want to front that in order to avoid		3	MS. MOE: Yes, your Honor. We just wanted to navigate	
4	creating an issue there.		4	that, otherwise I think we would make arrangements for Jane to	
5	THE COURT: Yes. Well, lead, and that way I don't		5	travel home to her family today. And so if we wanted to make	
6	have to strike the testimony as not a prior consistent		6	those arrangements, we will need to be in touch with her to	
7	statement.		7	make those arrangements, otherwise not planning to have	
8	MS. MOE: Yes, your Honor. If the Court authorizes us		8	substantive communications, but I wanted to be very transparent	
9	to lead, I think we can navigate through this area.		9	and candid about those contacts and just the state-of-play on	
10	THE COURT: Ms. Sternheim, okay if she leads through		10	this issue.	
11	this portion?		11	MS. MENNINGER: Your Honor, my recollection is that	
12	MS. STERNHEIM: I have no problem with that, Judge,		12	there was a second witness who was going to be offering prior	
13	but if the witness on his own sua sponte says girls, I will be		13	consistent statements for Jane.	
14	objecting to that. I cannot rely on what they are going to do		14	MS. MOE: That's correct, your Honor. I think our	
15	or not do in closing.		15	preference would be for Jane to be permitted to leave the	
16	THE COURT: I agree with that. That's why I said --		16	district, but if we can be in touch with her about the	
17	MS. STERNHEIM: That's fine.		17	possibility of a need for recall after today, if there are	
18	THE COURT: -- I will let Ms. Moe lead so I don't have		18	additional prior consistent statements, we can navigate it that	
19	to strike that testimony. I think we are in agreement that if		19	way. Otherwise, Jane would have to remain in the district for	
20	he were to testify that she told her that there were girls, the		20	I think potentially a long time.	
21	implication would be underage; that implication wouldn't be a		21	MS. MENNINGER: I have no objection to that, your	
22	prior consistent statement, and so I wouldn't allow that		22	Honor. I do have one clarifying question, which is, while not	
23	implication to stay with the jury.		23	observing the trial in the courtroom, there is certainly	
24	MS. STERNHEIM: I understand, and I thank you for		24	substantial coverage of the trial including relaying witnesses'	
25	that. But the other part would be there was no testimony on		25	testimony. So I don't know whether that has been clarified	

LC1Qmax6	Jane - Redirect	Page 628	LC1Qmax6	Matt - Direct	Page 630
1	with the witness that not just sitting in the overflow room,		1	examination of the witness testifying under the pseudonym Matt.	
2	but we're not reading media about it either.		2	MS. MOE: Thank you your Honor is the Court's order	
3	THE COURT: I'm sure you all discussed this when I		3	with respect to sketch artists now in effect?	
4	raised the 615 issue weeks ago, right? Maybe it surprised you		4	THE COURT: It is.	
5	there's media coverage.		5	MS. MOE: Thank you.	
6	Why don't you talk -- I am going to bring in the jury,		6	DIRECT EXAMINATION	
7	so you'll talk about it and let me know if you disagree.		7	BY MS. MOE:	
8	MS. MOE: Thank you, your Honor.		8	Q. Good afternoon.	
9	THE COURT: Okay. Bring in the jury.		9	A. Good afternoon.	
10	I'm sorry. Two administrative matters before we bring		10	Q. Are you testifying under the name Matt today?	
11	in the jury. I admitted J-8 and 9.		11	A. Yes.	
12	MS. MENNINGER: Yes, your Honor.		12	Q. Are you using a pseudonym in order to protect the privacy	
13	THE COURT: And to be clear, that needs to be admitted		13	of the person you are going to be testifying about today?	
14	under seal because it has specific identifying information of a		14	A. Yes.	
15	witness whom I've permitted to testify under a pseudonym.		15	Q. I'd like you to just take a look at the witness stand.	
16	Tell me if that's true for J-15 as well.		16	There's a folder in front of you. Would you mind just taking a	
17	MS. MENNINGER: Your Honor, I believe that was a		17	look at that document. And that is what's marked for	
18	pleading that was filed under a pseudonym. I can check it		18	identification as Government Exhibit 17?	
19	certainly to be sure and confer with the government. We'll		19	A. Yes.	
20	check it one more time, your Honor --		20	Q. Without saying what's on the document, do you recognize	
21	THE COURT: Okay.		21	that?	
22	MS. MENNINGER: -- and confer.		22	A. Yes, I do.	
23	And then as for 8 and 9, we were going to put 8 and 9		23	Q. What is that?	
24	on the sticker, make copies to replace in the binder.		24	A. It's my driver's license.	
25	THE COURT: Okay. So confer and let me know if J-15		25	Q. Is that your true name?	
LC1Qmax6	Jane - Redirect	Page 629	LC1Qmax6	Matt - Direct	Page 631
1	needs to be admitted under seal.		1	A. Yes, it is.	
2	MS. MOE: Thank you, your Honor. We'll review the		2	MS. MOE: Your Honor, the government offers Government	
3	transcript from today and confer about exhibits and their		3	Exhibit 12 under seal.	
4	status under seal.		4	MS. STERNHEIM: No objection.	
5	THE COURT: And then, to be clear, the next witness		5	THE COURT: Without objection, GX-12 is admitted under	
6	I'm permitting to testify under a pseudonym to protect the		6	seal to protect the identity of the witness who I permitted to	
7	identity of the prior witness.		7	testify under a pseudonym.	
8	MS. MOE: Yes, your Honor.		8	MS. MOE: Apologies, your Honor. My colleagues just	
9	THE COURT: And so I guess consistent with that,		9	alerted me it's Government Exhibit 17, not 12. I misspoke.	
10	sketch artists should not draw an exact likeness of the next		10	THE COURT: Or I did. GX-17. Thank you.	
11	witness who will also be testifying under a pseudonym.		11	MS. MOE: Thank you, your Honor.	
12	MS. MOE: Yes, your Honor.		12	(Government's Exhibit 17 received in evidence under	
13	THE COURT: Now we can bring in the jury.		13	seal)	
14	(Jury present)		14	MS. MOE: May the jurors now view that exhibit in	
15	THE COURT: Please take your seats as you come in.		15	their binders?	
16	Everyone may be seated. Thank you, members of the jury.		16	THE COURT: Without objection, Ms. Sternheim.	
17	Ms. Moe the government may call its next witness.		17	MS. STERNHEIM: No objection, your Honor.	
18	MS. MOE: Thank you, your Honor. The government calls		18	THE COURT: Jurors may pick up your binders and look	
19	a witness identified as Matt.		19	at Exhibit GX-17, please. Large binder, GX-17. Thank you.	
20	THE COURT: The witness identified as Matt may come		20	BY MS. MOE:	
21	forward.		21	Q. Now that the jurors are there, just to be clear, on	
22	MATT,		22	Government Exhibit 17, is that your true name?	
23	called as a witness by the Government,		23	A. Yes, that is.	
24	having been duly sworn, testified as follows:		24	Q. Is that your driver's license?	
25	THE COURT: Ms. Moe, you may begin your direct		25	A. Yes, that is.	



<p>LC1Qmax6 Matt - Direct Page 632</p> <p>1 Q. For today's purposes --</p> <p>2 THE COURT: Ms. Moe, can you come closer to the mic?</p> <p>3 Q. For today's purposes, we'll be referring to you as Matt.</p> <p>4 Is that okay?</p> <p>5 A. Yes, that's okay.</p> <p>6 Q. All right. If the jurors could keep their binders for a</p> <p>7 moment up, we'll turn to another exhibit in a moment. Let me</p> <p>8 pause here and just ask you, Matt, how far did you go in</p> <p>9 school?</p> <p>10 A. High school.</p> <p>11 Q. What kind of work do you do now?</p> <p>12 A. I'm an actor.</p> <p>13 Q. Do you work on a television show?</p> <p>14 A. Yes, I do.</p> <p>15 Q. Are you employed full time as an actor in a television</p> <p>16 show?</p> <p>17 A. Yes, I am.</p> <p>18 Q. For how many years have you been employed full time as an</p> <p>19 actor?</p> <p>20 A. I'd say on and off for the last 15 years.</p> <p>21 Q. And if you could please take a look at the binder in front</p> <p>22 of you, and take a look at Government Exhibit 12, which is in</p> <p>23 evidence and under seal. Do you have Government Exhibit 12 in</p> <p>24 that folder?</p> <p>25 A. Yes, I do.</p>	<p>LC1VMAX7 Matt - direct Page 634</p> <p>1 BY MS. MOE:</p> <p>2 Q. Did there come a time when you were in a romantic</p> <p>3 relationship with Jane?</p> <p>4 A. Yes.</p> <p>5 Q. During approximately what years were you in a romantic</p> <p>6 relationship with Jane?</p> <p>7 A. 2006 till 2014, approximately.</p> <p>8 Q. During those years, did you live together?</p> <p>9 A. Yes.</p> <p>10 Q. What years did you live together?</p> <p>11 A. 2007 till 2014.</p> <p>12 Q. Did you keep in touch with Jane after you broke up?</p> <p>13 A. Yes.</p> <p>14 Q. What's the nature of your current relationship with Jane?</p> <p>15 A. We're friends.</p> <p>16 Q. Have you had a professional relationship with Jane?</p> <p>17 A. Yes, I have.</p> <p>18 Q. What's the nature of your professional relationship with</p> <p>19 Jane?</p> <p>20 A. Jane and I, we work on the same TV show.</p> <p>21 Q. During the years that you lived with Jane, did you get to</p> <p>22 know some of her family members?</p> <p>23 A. Yes, I did.</p> <p>24 Q. Were there times when Jane would talk to you about what her</p> <p>25 home life was like when she was growing up?</p>
<p>LC1Qmax6 Matt - Direct Page 633</p> <p>1 Q. I would ask that the jurors please turn to Government</p> <p>2 Exhibits 12 in their binder, which is in evidence and under</p> <p>3 seal.</p> <p>4 THE COURT: Without objection, Ms. Sternheim?</p> <p>5 MS. STERNHEIM: No objection.</p> <p>6 THE COURT: You may look at GX-12, please.</p> <p>7 MS. MOE: Thank you, your Honor.</p> <p>8 Q. Focusing on Government Exhibit 12, I want to direct your</p> <p>9 attention to the top left corner of that document. Without</p> <p>10 saying her name, do you recognize the person listed on that</p> <p>11 birth certificate?</p> <p>12 A. Yes, I do.</p> <p>13 Q. For today's purposes, we're going to refer to that person</p> <p>14 as Jane. Will you do that?</p> <p>15 A. Yes.</p> <p>16 MS. MOE: Thank you, your Honor. I think that's all</p> <p>17 we need for the binders today?</p> <p>18 THE COURT: Okay. Put the binders away.</p> <p>19 Q. Now that we know who we're talking about, I want to ask you</p> <p>20 some questions about Jane. How do you know Jane?</p> <p>21 A. She's my ex-girlfriend.</p> <p>22 Q. Approximately what year did you first meet Jane?</p> <p>23 A. First time was 2002 and the second time was 2006.</p> <p>24 (Continued on next page)</p> <p>25</p>	<p>LC1VMAX7 Matt - direct Page 635</p> <p>1 A. Yes.</p> <p>2 Q. Let me just take a step back and ask you some questions</p> <p>3 about how that topic came up. In general, how would the topic</p> <p>4 of Jane's home life come up during the course of your</p> <p>5 relationship?</p> <p>6 A. There's different aspects of the home life, but just most</p> <p>7 likely, I would say, getting to know her family and getting to</p> <p>8 know the relationships between her and her siblings and her</p> <p>9 mother and the struggles that she went through.</p> <p>10 Q. During the years that you were dating Jane, did she tell</p> <p>11 you about what her home life was like when she was a kid?</p> <p>12 A. Yes, she did.</p> <p>13 Q. What did she tell you about that?</p> <p>14 MS. STERNHEIM: Objection.</p> <p>15 THE COURT: Do you want a more specific question?</p> <p>16 MS. STERNHEIM: Well, that is hearsay. That is not</p> <p>17 the basis of this witness's testimony.</p> <p>18 MS. MOE: Your Honor, it's both the foundation for a</p> <p>19 prior consistent statement and a prior consistent statement</p> <p>20 itself.</p> <p>21 THE COURT: In light of cross, I think that's right,</p> <p>22 but I'll hear you if --</p> <p>23 MS. STERNHEIM: If I may be heard briefly.</p> <p>24 THE COURT: Yes.</p> <p>25 (Continued on next page)</p>

LC1VMAX7	Matt - direct	Page 636	LC1VMAX7	Matt - direct	Page 638
1	(At sidebar)		1	have a witness here who's just going to testify about	
2	THE COURT: We discussed this yesterday, didn't we?		2	everything he knew about her because he was in a relationship	
3	MS. STERNHEIM: Judge, the witness is going to talk		3	with her and --	
4	about home life. It's not the subject matter of his testimony,		4	THE COURT: No, I won't allow everything that he knew	
5	it's whether she revealed to him at a time earlier than meeting		5	about her. I will allow issues that you specifically spent	
6	with the government allegations concerning Ms. Maxwell.		6	time on cross-examination.	
7	THE COURT: Well, but Ms. Menninger crossed on the		7	MS. STERNHEIM: Okay.	
8	veracity of her poverty and financial situation growing up and		8	THE COURT: Attacking her credibility.	
9	the relationship with her mother, and I assume that's where		9	(Continued on next page)	
10	we're going.		10		
11	MS. STERNHEIM: I think the government -- I don't		11		
12	think that's the issue here. The issue is whether she stated		12		
13	at sometime earlier that she was abused.		13		
14	THE COURT: Well, that's true. But you've put in		14		
15	issue her credibility about everything. Why did you cross her		15		
16	on whether she grew up poor?		16		
17	MS. STERNHEIM: Because they raised it. They raised		17		
18	the fact that she lived in a pool house. The witness testified		18		
19	under oath that she lost her home after her father died. I		19		
20	don't think that's the issue --		20		
21	THE COURT: So you've attacked her credibility on		21		
22	that. You said her credibility on everything is an issue. You		22		
23	specifically attacked her credibility on that. Why can't it		23		
24	come in as a prior consistent -- you're saying this witness can		24		
25	only testify about --		25		
LC1VMAX7	Matt - direct	Page 637	LC1VMAX7	Matt - direct	Page 639
1	MS. STERNHEIM: Judge, if that was the case, then		1	(In open court)	
2	anytime a witness is on the stand who spoke about their home		2	THE COURT: Ms. Moe, I'll ask you to rephrase, to	
3	life, you could bring a witness in? I've never seen that		3	narrow the question.	
4	before. I understand the subject matter with regard to the		4	MS. MOE: Yes, your Honor.	
5	allegations in this case.		5	BY MS. MOE:	
6	THE COURT: Right. For sure.		6	Q. Matt, were there times when Jane would talk to you about	
7	MS. STERNHEIM: But prior consistent, my father died,		7	her family's financial circumstances when she was growing up?	
8	I don't think that we're contesting that her father died.		8	A. Yes.	
9	THE COURT: Right. But you contested whether she grew		9	Q. What did she tell you about that?	
10	up poor, whether she had a relationship with her mother that		10	A. She told me that when her father got sick, that her mother	
11	wouldn't allow her to -- you put all of those things at issue;		11	spent basically all of the money that they had for his	
12	made a strong point that every inconsistency is an issue		12	treatments, and obviously hoping that he would survive. And he	
13	because her credibility is central. Good for the goose, good		13	didn't. And basically she -- that she was the one who left	
14	for the gander.		14	them broke.	
15	MS. STERNHEIM: No, that would mean they could pull		15	Q. And did Jane tell you what her family's financial	
16	anyone she was involved with to support the fact that she had a		16	circumstances were like after her father passed away?	
17	difficult --		17	A. Yes.	
18	THE COURT: What is the nature of your objection? So		18	Q. What did she tell you about that?	
19	that this witness -- I mean, either it's a prior consistent		19	A. That they basically had no money. The mother was working a	
20	statement or it's not. I don't understand -- so under the Rule		20	small job. And I think she said at one point the three of	
21	801(b)(3), right, that's the evidentiary objection. You		21	the -- that her and her two brothers were sleeping in the same	
22	attacked her credibility on what she testified about her home		22	bed at one point because they were living in such a small	
23	life. What is the evidentiary objection? Relevance? 403?		23	place, and the three of them had to sleep in the same bed.	
24	Tell me.		24	Q. Did there come a time when Jane told you how she was able	
25	MS. STERNHEIM: Judge, it seems like we're going to		25	to pay for things when she was a kid?	

<p>LC1VMAX7 Matt - direct Page 640</p> <p>1 A. Yes, she did.</p> <p>2 Q. Approximately what year was it when this conversation came</p> <p>3 up?</p> <p>4 A. It's probably 2006, 2007, when we -- when we first started</p> <p>5 dating, just getting to know each other.</p> <p>6 Q. What did Jane tell you during that conversation about how</p> <p>7 she was able to pay for things when she was a kid?</p> <p>8 A. She said her mom had a job that paid basically nothing; and</p> <p>9 that she had it -- it was like a godfather, an uncle, a family</p> <p>10 friend type person that basically helped her mom pay the bills.</p> <p>11 Q. Is this something Jane discussed with you once or more than</p> <p>12 once during the course of your relationship?</p> <p>13 A. More than once.</p> <p>14 Q. During the conversations with Jane about this godfather</p> <p>15 figure, did you come to learn the name of the uncle figure or</p> <p>16 godfather figure?</p> <p>17 A. Yes, I did.</p> <p>18 Q. What did she tell you his name was?</p> <p>19 A. His name is Jeffrey Epstein.</p> <p>20 Q. In general, when Jane would talk with you about her</p> <p>21 experiences with Jeffrey Epstein, how would that topic come up?</p> <p>22 A. First it was purely that he was -- you know, that he was a</p> <p>23 godfather and, you know, he was looking out for her family.</p> <p>24 And then the topic came up when she came to me when --</p> <p>25 I think it was in two thousand -- like 2009, she was contacted,</p>	<p>LC1VMAX7 Matt - direct Page 642</p> <p>1 THE COURT: Okay. And then you'll ask it as a more</p> <p>2 specific question.</p> <p>3 MS. MOE: Yes, your Honor.</p> <p>4 THE COURT: Thank you.</p> <p>5 BY MS. MOE:</p> <p>6 Q. Did there ever come a time when Jane explained to you why</p> <p>7 it was that she received financial help from Jeffrey Epstein?</p> <p>8 A. Yes, she did.</p> <p>9 Q. Approximately when did she tell you about that?</p> <p>10 A. When -- when the -- when she told me who it was, when she</p> <p>11 told me the name of the person and --</p> <p>12 Q. What did Jane tell you about why it was that she received</p> <p>13 this money from Jeffrey Epstein?</p> <p>14 A. Well, once -- once I learned who it was, I asked her if she</p> <p>15 was one of the girls, and she said that she was.</p> <p>16 MS. STERNHEIM: Objection.</p> <p>17 THE COURT: I'll sustain the objection.</p> <p>18 The jury will disregard the last statement of the</p> <p>19 witness. And you'll ask a specific question, Ms. Moe.</p> <p>20 BY MS. MOE:</p> <p>21 Q. Did Jane tell you what happened between her and Jeffrey</p> <p>22 Epstein during the years that she knew him?</p> <p>23 A. Not specifically.</p> <p>24 Q. Did there come a time when she told you why it was that</p> <p>25 Jeffrey Epstein gave her money?</p>
<p>LC1VMAX7 Matt - direct Page 641</p> <p>1 I think, by the FBI to see if she would tell her story, if she</p> <p>2 had a story.</p> <p>3 And she came to me and she said, I need to tell you</p> <p>4 something.</p> <p>5 And I said, Yeah.</p> <p>6 And she said, You know the godfather that I told you</p> <p>7 about, the person that was helping my family?</p> <p>8 And I said, Yes, I do.</p> <p>9 And she said, I need you to know that this is who it</p> <p>10 is.</p> <p>11 And it was public news.</p> <p>12 And that's when I said, That guy is your godfather?</p> <p>13 That's the guy that was helping you pay your bills and your</p> <p>14 family's bills?</p> <p>15 And she said, Yes.</p> <p>16 Q. Did Jane tell you when she met Jeffrey Epstein?</p> <p>17 A. Yes.</p> <p>18 Q. What did Jane tell you about when she met Jeffrey Epstein?</p> <p>19 A. She told me she met him shortly after --</p> <p>20 THE COURT: Just a minute. Just a minute.</p> <p>21 THE WITNESS: Sorry.</p> <p>22 THE COURT: More specific question.</p> <p>23 MS. MOE: Your Honor, I can lay some additional</p> <p>24 foundation for that and return to it later, if that's</p> <p>25 acceptable.</p>	<p>LC1VMAX7 Matt - direct Page 643</p> <p>1 A. Yes.</p> <p>2 Q. What did she tell you about that?</p> <p>3 A. Well, I was the one that asked her, based on after finding</p> <p>4 out who it was, I asked her if she was doing that for the</p> <p>5 money.</p> <p>6 Q. What did she tell you she was doing for the money?</p> <p>7 A. She said it wasn't --</p> <p>8 THE COURT: Just a minute. Just a minute.</p> <p>9 Sustained.</p> <p>10 Q. In your conversations with Jane about Jeffrey Epstein, did</p> <p>11 there come a time when she told you that she had to do things</p> <p>12 she didn't want to do?</p> <p>13 A. Yes.</p> <p>14 Q. What did she tell you about that?</p> <p>15 A. She never went into detail; she just said it wasn't free.</p> <p>16 Q. Did she ever use any particular words to describe the</p> <p>17 things that she had to do with Jeffrey Epstein?</p> <p>18 A. Nothing specific. No specific words.</p> <p>19 Q. In your conversations with her, did she ever use the word</p> <p>20 "massage"?</p> <p>21 MS. STERNHEIM: Objection. Leading.</p> <p>22 THE COURT: Overruled.</p> <p>23 I'll allow it. You may answer.</p> <p>24 A. Yes.</p> <p>25 Q. What did she tell you about that?</p>

LC1VMAX7	Matt - direct	Page 644	LC1VMAX7	Matt - direct	Page 646
1	A. I think it was only because of the fact that it was public		1	Q. At the time when you were having these conversations with	
2	knowledge, and that was as far as she would ever let me go into		2	Jane about this woman, did she tell you what the woman's name	
3	the -- into the -- what happened, what she did.		3	was?	
4	Q. Okay. But focusing on her statements to you, what did she		4	A. No, she didn't.	
5	tell you about massage?		5	Q. In general, when Jane would tell you about what had	
6	A. Just that was it, that -- basically, that was it.		6	happened with her and Jeffrey Epstein, what was her demeanor	
7	Q. Did Jane ever tell you how old she was when she had to do		7	like?	
8	things with Jeffrey Epstein?		8	MS. STERNHEIM: Objection.	
9	MS. STERNHEIM: Objection.		9	THE COURT: Grounds.	
10	A. Yes.		10	MS. STERNHEIM: Relevance.	
11	THE COURT: Overruled.		11	MS. MOE: Your Honor, it's --	
12	Q. And what did Jane tell you about how old she was when she		12	THE COURT: Overruled.	
13	had to do things with Jeffrey Epstein?		13	Go ahead. You may answer.	
14	A. She said that it started at 14, when she met him.		14	A. What was the question again?	
15	Q. Did she tell you where she met him?		15	Q. I'm happy to repeat it.	
16	A. Yes.		16	Matt, when you would have these conversations with	
17	Q. What did she tell you about that?		17	Jane about her interactions with Jeffrey Epstein, what was her	
18	A. She said it was a camp.		18	demeanor like when she would tell you about that?	
19	Q. In these conversations with Jane, did she ever tell you		19	A. Ashamed, embarrassed, horrified.	
20	that someone else was present during a massage?		20	Q. Without telling me what she said, did you ask her about the	
21	A. No.		21	details about what had happened with her and Jeffrey Epstein?	
22	Q. In your conversations with Jane, did you ever have any		22	A. Yes, I did.	
23	conversations with her about a woman?		23	Q. In those interactions, did she provide you with details	
24	A. Yes.		24	about those interactions?	
25	Q. In your conversations with Jane about Jeffrey Epstein, did		25	A. No, she didn't.	
LC1VMAX7	Matt - direct	Page 645	LC1VMAX7	Matt - direct	Page 647
1	she tell you that there was a woman present at his house?		1	Q. What was her reaction when you asked her for details about	
2	A. Yes.		2	those interactions?	
3	Q. Did she tell you that the woman in the house made her feel		3	A. She would just say to me, Matt, the money wasn't fucking	
4	comfortable?		4	free.	
5	A. Yes.		5	Q. Did she go beyond that?	
6	Q. Why did you ask her about the woman in the house?		6	A. No, she didn't.	
7	A. I asked her because I couldn't understand why her mother		7	Q. I believe you testified that you met Jane's family members	
8	would let her go with a man without anybody else present. And		8	when you were dating; is that right?	
9	then she told me sometimes there were other girls present.		9	A. Yes.	
10	MS. STERNHEIM: Objection.		10	Q. Based on your observations during the years that you dated	
11	THE COURT: Sustained.		11	Jane, what was her relationship like with her mother?	
12	The jury will disregard the witness's last statement.		12	A. It was rough. It was brutal.	
13	Ms. Moe, you'll lead.		13	Q. Did there ever come a time when you saw Jane confront her	
14	MS. MOE: Yes, your Honor.		14	mother about Jeffrey Epstein?	
15	Q. In your conversations with Jane -- withdrawn.		15	A. Yes, I did.	
16	Approximately what year was it that Jane told you		16	Q. Approximately when was that?	
17	about this woman who made her feel comfortable?		17	A. I think it was approximately 2011.	
18	A. It was when I found out about Jeffrey, approximately 2009.		18	Q. Where were you when that happened?	
19	Q. And in your conversations with Jane about her interactions		19	A. I was at a house.	
20	with Jeffrey Epstein, did she tell you that this woman would		20	Q. Who was in the room when you had that conversation?	
21	tell her that it was okay?		21	A. It was just --	
22	A. Not specifically that. She didn't use those words.		22	MS. STERNHEIM: Objection.	
23	Q. Okay. What words did she use?		23	Sidebar please.	
24	A. She just said that having a woman there made her feel --		24	THE COURT: One word, grounds.	
25	made her feel more comfortable.		25	MS. STERNHEIM: First time we are hearing this.	

LC1VMAX7	Matt - direct	Page 648	LC1VMAX7	Matt - direct	Page 650
1	THE COURT: Okay.		1	(In open court)	
2	(At sidebar)		2	THE COURT: Go ahead.	
3	THE COURT: What do you expect the witness to say?		3	BY MS. MOE:	
4	MS. MOE: That he recalls being present when Jane and		4	Q. Did there ever come a time when you saw Jane confront her	
5	her mother were in a room. He recalls Jane saying to her		5	mother about Jeffrey Epstein?	
6	mother, How could you not know the money wasn't for free? How		6	A. Yes.	
7	could you not know?		7	Q. Approximately when was that conversation?	
8	THE COURT: Is that in 3500 material?		8	A. 2011.	
9	MS. MOE: Yes, I'm happy to pull it up.		9	Q. Who was present for that conversation?	
10	MS. STERNHEIM: There's been no testimony by Jane		10	A. It was just me, her, and her mom.	
11	about confrontation with her mother at this time. She		11	Q. What do you remember Jane saying to her mother during that	
12	testified that her mother was irate regarding a guidance		12	conversation?	
13	counsellor, but she didn't go toe-to-toe with her mother about		13	A. She told her mother that the money was not free, and	
14	Jeffrey Epstein.		14	confronted her mother about it. And her mother said, crying --	
15	THE COURT: So it's in the 3500 material; it's not the		15	THE COURT: Just a minute.	
16	first time you're hearing it.		16	Q. Just focusing on just what Jane said and not what her	
17	MS. STERNHEIM: I don't recall if it's this witness or		17	mother said, can you explain to the jury what did Jane say to	
18	her brother.		18	her mother?	
19	THE COURT: Okay.		19	A. How do you think I got the money, mom?	
20	MS. STERNHEIM: But even if it is in the 3500		20	Q. Did she ask her mother whether her mother knew?	
21	material, if it is not on the direct of Jane, why can it be		21	A. She told her mother that she knew. She accused her of it.	
22	offered as a prior consistent statement when it never was		22	Q. What do you remember about the exact words that she used?	
23	offered at all?		23	A. That Jane used, right?	
24	MS. MOE: This is a statement from Jane to her mother		24	Q. Yes. Can you just explain for the jury, what did Jane say	
25	essentially acknowledging she was abused, expressing		25	to her mother?	
LC1VMAX7	Matt - direct	Page 649	LC1VMAX7	Matt - direct	Page 651
1	frustration about that. That is entirely consistent with her		1	A. Jane told her mother that -- that she -- that the money was	
2	testimony that she was, in fact, abused.		2	not free, and that there's no way that she couldn't have known	
3	MS. STERNHEIM: But not with regard to her mother		3	that it wasn't free.	
4	having a confrontation.		4	Q. Did there come a time when you learned that a woman named	
5	THE COURT: Well, it's a prior consistent statement		5	Ghislaine Maxwell was arrested?	
6	that he heard related to the abuse which you've repeatedly		6	A. Yes.	
7	called into question in your opening and your direct and in		7	Q. Was that in 2020?	
8	your cross-examination.		8	A. Yes.	
9	MS. STERNHEIM: Judge, I understand that. But we're		9	Q. Without getting into details, how did you learn that	
10	talking about prior consistent statements.		10	Ghislaine Maxwell was arrested?	
11	THE COURT: Right. The prior consistent statement is		11	A. I saw it on the news.	
12	that she was abused by Jeffrey Epstein.		12	Q. When you learned that Maxwell had been arrested, did you	
13	MS. STERNHEIM: But they are bringing out a		13	contact Jane?	
14	conversation. If she wants to say, Did you know or learn that		14	A. Yes.	
15	she was abused? Yes. But a conversation that she had with her		15	Q. What did you ask her?	
16	mother is hearsay.		16	A. I just said, Is this the woman that you were referring to	
17	MS. MOE: Your Honor, it's not hearsay because it's a		17	when you told me? And she said yes.	
18	prior consistent statement of Jane about her experiencing		18	Q. Just to be clear, during your relationship with Jane, did	
19	sexual abuse.		19	she tell you that there was a woman at Jeffrey Epstein's house	
20	THE COURT: Yes. Overruled.		20	who made her feel comfortable?	
21	(Continued on next page)		21	A. Yes.	
22			22	MS. STERNHEIM: Asked and answered.	
23			23	THE COURT: Sustained.	
24			24	MS. MOE: Just a moment, your Honor.	
25			25	THE COURT: Okay.	

LC1VMAX7	Matt - direct	Page 652	LC1VMAX7	Besselsen - direct	Page 654
1	(Counsel conferred)		1	A. I oversee the finance department, including accounts	
2	MS. MOE: Nothing further, your Honor.		2	payable, accounts receivable, our purchasing, payroll. I'm	
3	THE COURT: All right. Thank you.		3	involved in overseeing director of campus safety and security,	
4	Ms. Sternheim.		4	as well as the director of dining services. And I'm involved	
5	MS. STERNHEIM: No, thank you.		5	with the auditors, the banks, the investment companies, as well	
6	THE COURT: All right.		6	as external audits.	
7	No cross.		7	Q. And in that capacity, are you familiar with the normal	
8	Witness Matt, you may step down.		8	business practices of Interlochen?	
9	You are excused.		9	A. Yes.	
10	(Witness excused)		10	Q. In particular, are you familiar with the business practices	
11	THE COURT: Government may call its next witness.		11	regarding communications with donors?	
12	MR. ROHRBACH: The government calls Daniel Besselsen.		12	A. Yes.	
13	THE COURT: You may come forward.		13	Q. Does Interlochen maintain records of its communications	
14	Mr. Besselsen, come forward.		14	with donors?	
15	Somebody is getting him, Mr. Rohrbach?		15	A. Yes.	
16	MR. ROHRBACH: Yes, your Honor.		16	Q. What sorts of records?	
17	We apologize for the delay.		17	A. For our major donors or prospects, we keep all	
18	THE COURT: You can take a standing stretching break,		18	correspondence with donors, whether it might be a letter, email	
19	if you'd like.		19	correspondence, records of phone conversations, notes from	
20	You may be seated.		20	visits with donors, things like that.	
21	DANIEL ALAN BESSELSSEN,		21	Q. Let's talk about letters in particular. How are letters	
22	called as a witness by the Government,		22	that are written to donors created?	
23	having been duly sworn, testified as follows:		23	A. The letters are created by an individual in our advancement	
24	THE COURT: Go ahead.		24	department who's charged with managing that particular donor	
25	MR. ROHRBACH: Thank you, your Honor.		25	relationship. And so they would be the ones that would write a	
LC1VMAX7	Besselsen - direct	Page 653	LC1VMAX7	Besselsen - direct	Page 655
1	DIRECT EXAMINATION		1	letter to a donor or to a foundation.	
2	BY MR. ROHRBACH:		2	Q. Is there any relationship between the level of donation	
3	Q. Good afternoon, Mr. Besselsen.		3	given and the person writing the letter to the donor?	
4	A. Good afternoon.		4	A. Yes. Yup. For example, our vice president of advancement	
5	Q. Mr. Besselsen, where do you work?		5	or even our president would handle a higher-end donor that	
6	A. I work at Interlochen Center for the Arts.		6	might be capable of donating half a million dollars or more,	
7	Q. What is Interlochen Center for the Arts?		7	for example. And we would have major gift officers that would	
8	A. Interlochen is a nonprofit organization focused on arts		8	be below that vice president of advancement that would handle	
9	education. We have our two largest programs, a arts camp in		9	folks with capacity to give \$100,000, \$200,000, something like	
10	the summer, and a boarding high school during September through		10	that.	
11	May. And we're focused on arts education, as I mentioned. So		11	Q. When these letters are written to donors, does Interlochen	
12	we have visual arts, music, creative writing, dance, theater,		12	put them in any sort of file?	
13	creative writing types of programming.		13	A. Yes, yup. We keep track of all correspondence with donors.	
14	Q. Where is Interlochen located?		14	Nowadays, it's all electronic within Salesforce, which is the	
15	A. We're located in Interlochen, Michigan.		15	software we use to track fundraising and donations.	
16	Q. Where is Interlochen, Michigan?		16	Historically, we have hard copy letters, for example. Prior to	
17	A. It's northern Michigan; it's about 20 minutes southwest of		17	using Salesforce, we've got manila folders or files that we	
18	Traverse City, Michigan, which is the largest town in northern		18	kept for each donor that includes all of the correspondence	
19	Michigan.		19	over time with that donor.	
20	Q. How long have you worked there?		20	Q. How long are those records kept?	
21	A. I've worked there 16 years.		21	A. They are kept forever.	
22	Q. What's your title?		22	Q. And are they kept by Interlochen in the ordinary course of	
23	A. My title is assistant vice president of finance.		23	business?	
24	Q. And what are your responsibilities as an assistant vice		24	A. Yes.	
25	president of finance?		25	MR. ROHRBACH: Ms. Drescher, would you please display	

LC1VMAX7	Besselsen - direct	Page 656	LC1VMAX7	Besselsen - direct	Page 658
1	for the witness, Court, and counsel what's been marked for		1	from the student, on a student.	
2	identification as Government Exhibit 741.		2	Q. And what sort of information is contained in student	
3	Q. Do you recognize this, Mr. Besselsen?		3	records, in student files?	
4	A. Yes.		4	A. So the files include comments from faculty that were	
5	Q. What is it?		5	involved with that student's time on a camp -- academy	
6	A. This is a letter from Interlochen's vice president of		6	programming or camp programming, as well as cabin life,	
7	advancement to Mr. Epstein providing some information to him on		7	comments from the counsellors during the camp programming, as	
8	the concept of building a scholarship lodge on Interlochen's		8	well as applications, paper applications, if you go back in	
9	campus and the level of donation that would be required to		9	time, if we're talking about a camper or academy student.	
10	build a lodge.		10	Q. And are those records regularly put into the student file?	
11	Q. Mr. Besselsen, will you pick up the binder next to you. It		11	A. Yes.	
12	has another copy of Government Exhibit 741.		12	Q. And does Interlochen regularly maintain those records?	
13	Have you reviewed this exhibit before today?		13	A. Yes.	
14	A. Yes.		14	Q. How long are student records kept?	
15	Q. And what is this exhibit?		15	A. Records are kept for 99 years per Interlochen's record	
16	A. This exhibit are all of the letters or a portion of the		16	retention policy.	
17	letters that were included in Mr. Epstein's file that we've		17	Q. In your binder, would you turn to what's been marked for	
18	stored away in the filing cabinet in the basement of the		18	identification as Government Exhibit 743.	
19	McWhorter dorm locked away.		19	Without saying any names, do you recognize this?	
20	Q. How do you know these letters come from the Epstein file at		20	A. Yes.	
21	Interlochen?		21	Q. What is it?	
22	A. I myself went in and pulled it recently and saw these.		22	A. This is an application for admission to our summer camp in	
23	Q. Thank you.		23	1994.	
24	MR. ROHRBACH: The government offers Government		24	Q. Did you review this prior to today?	
25	Exhibit 741.		25	A. I did.	
LC1VMAX7	Besselsen - direct	Page 657	LC1VMAX7	Besselsen - direct	Page 659
1	THE COURT: 741 is how many pages?		1	Q. And turning to page 3 of that exhibit, is that photo part	
2	MR. ROHRBACH: It is -- I believe it's eight pages,		2	of the application?	
3	your Honor.		3	A. Yes.	
4	THE COURT: Okay.		4	Q. How do you know?	
5	MR. ROHRBACH: Yes, it's eight pages.		5	A. Once again, this is something that I went in and tracked	
6	MS. STERNHEIM: May I confer with the government for a		6	down and pulled this particular camper's file myself. And this	
7	moment?		7	was -- and these documents were in it, and this was attached to	
8	THE COURT: You may.		8	this particular application.	
9	(Counsel conferred)		9	MR. ROHRBACH: The government offers Government	
10	MS. STERNHEIM: Thank you, Judge.		10	Exhibit 743 under seal.	
11	THE COURT: So it's eight pages.		11	MS. STERNHEIM: No objection.	
12	MR. ROHRBACH: Yes, your Honor.		12	THE COURT: GX-743 is admitted under seal, consistent	
13	THE COURT: All right. Without objection, GX-741 is		13	with my ruling allowing the individual listed to testify under	
14	admitted.		14	a pseudonym.	
15	(Government's Exhibit 741 received in evidence)		15	(Government's Exhibit 743 received in evidence)	
16	BY MR. ROHRBACH:		16	Q. Mr. Besselsen, does Interlochen keep records that a student	
17	Q. Mr. Besselsen, are you familiar with Interlochen's business		17	completes a program?	
18	practices regarding student records?		18	A. Yes.	
19	A. Yes.		19	Q. Who makes those records?	
20	Q. Does Interlochen keep a file on each student?		20	A. Those records would be made or input by our admissions	
21	A. Yes.		21	office.	
22	Q. And how is that file maintained?		22	Q. And how are those records maintained?	
23	A. The file is maintained in a locked room in the lower level		23	A. When a student is accepted and enrolls in a program, that	
24	of the Maddy Administration Building. Once again, it's manila		24	is when those records are created in our software.	
25	files or folders for each student, and includes information		25	Q. And to be clear, are those records kept in the ordinary	

<p>LC1VMAX7 Besselsen - direct Page 660</p> <p>1 course of business?</p> <p>2 A. Yes.</p> <p>3 Q. In your binder, would you turn to what's been marked for</p> <p>4 identification as Government Exhibit 744.</p> <p>5 Do you recognize this?</p> <p>6 A. Yes.</p> <p>7 Q. Without saying any names, what is it?</p> <p>8 A. This is a report out of Salesforce, which is our software</p> <p>9 that we use not only for fundraising, but also for student</p> <p>10 records, that I generated. And it's a report on education</p> <p>11 records, specifically pulling the completion year, first name,</p> <p>12 last name, and education type, with a filter on the last name.</p> <p>13 Q. And just so the record is clear, you personally generated</p> <p>14 this spreadsheet?</p> <p>15 A. I did, yes.</p> <p>16 MR. ROHRBACH: The government offers Government</p> <p>17 Exhibit 744 under seal.</p> <p>18 MS. STERNHEIM: No objection.</p> <p>19 THE COURT: GX-744 is admitted under seal consistent</p> <p>20 with my ruling allowing the individual listed to testify under</p> <p>21 a pseudonym.</p> <p>22 (Government's Exhibit 744 received in evidence)</p> <p>23 Q. Mr. Besselsen, I'd like to walk briefly through some of the</p> <p>24 exhibits we were just looking at.</p> <p>25 MR. ROHRBACH: Ms. Drescher, would you please publish</p>	<p>LC1VMAX7 Besselsen - direct Page 662</p> <p>1 Q. Mr. Besselsen, what is the date of this letter?</p> <p>2 A. February 9, 1994.</p> <p>3 MR. ROHRBACH: And turning now to the next page,</p> <p>4 Ms. Drescher.</p> <p>5 Q. Who is this letter from, Mr. Besselsen?</p> <p>6 A. The letter is from Tim Ambrose, vice president of</p> <p>7 advancement.</p> <p>8 MR. ROHRBACH: Ms. Drescher, turn to page 5 of this</p> <p>9 document.</p> <p>10 Q. Mr. Besselsen, what is this document?</p> <p>11 A. This is a letter from Interlochen's vice president of</p> <p>12 advancement to Ms. Maxwell enclosing an envelope that was found</p> <p>13 when Interlochen's custodial staff was cleaning the Epstein</p> <p>14 scholarship lodge, returning the lost envelope to Ms. Maxwell,</p> <p>15 as well as the next page of this provides a listing of items.</p> <p>16 Q. Mr. Besselsen, we'll get to the next page in a moment, but</p> <p>17 would you read this letter for us?</p> <p>18 A. Yes.</p> <p>19 Dear Ghislaine, enclosed is the envelope we recently</p> <p>20 found in cleaning the Epstein Lodge. Apparently it lodged</p> <p>21 between the wall and the dresser. It was not discovered until</p> <p>22 the unit was moved for cleaning.</p> <p>23 As we discussed, the final week of camp is August 14</p> <p>24 through the 20th. I've reserved the lodge for Jeffrey's use.</p> <p>25 In addition, he has one more week that he can reserve for</p>
<p>LC1VMAX7 Besselsen - direct Page 661</p> <p>1 Government Exhibit 741 for the Court, counsel, the witness, and</p> <p>2 the jury.</p> <p>3 Q. Mr. Besselsen, what is this document?</p> <p>4 A. This is a letter from Interlochen's vice president of</p> <p>5 advancement to Mr. Epstein providing him with additional</p> <p>6 information on the scholarship lodge, building a scholarship</p> <p>7 lodge on Interlochen's campus, and what it would take to -- in</p> <p>8 regards to donating for that project.</p> <p>9 Q. You mentioned a scholarship lodge. What is a scholarship</p> <p>10 lodge?</p> <p>11 A. A scholarship lodge is a rental lodge, a small home on our</p> <p>12 campus where parents of campers or academy students can come</p> <p>13 stay on campus, be close to the performance venues and things</p> <p>14 like that. So parents or guests of Interlochen or even the</p> <p>15 general public who come stay in this rental lodge and pay a --</p> <p>16 like a fee, like a hotel room to stay in.</p> <p>17 MR. ROHRBACH: Ms. Drescher, would you turn to page 2</p> <p>18 of this document.</p> <p>19 Q. What is this document? What are we looking at,</p> <p>20 Mr. Besselsen?</p> <p>21 A. This is a letter, again, from Interlochen's vice president</p> <p>22 of advancement to Mr. Epstein thanking him for his donation of</p> <p>23 \$200,000 for a new scholarship lodge on our campus, and the</p> <p>24 different updates provided in the letter about construction</p> <p>25 timelines and things like that.</p>	<p>LC1VMAX7 Besselsen - direct Page 663</p> <p>1 himself or guests. He may wish to have use it.</p> <p>2 Attached is a list of the dry goods that are in</p> <p>3 storage as part of Jeffrey's personal inventory. Please advise</p> <p>4 if we are missing any items you are aware of being sent here.</p> <p>5 Please convey to Jeffrey how pleased we are to have such a</p> <p>6 facility on our campus. In fact, the president-elect will be</p> <p>7 staying in the lodge until his family's furniture arrives. It</p> <p>8 is a remarkable place. We are grateful.</p> <p>9 Best wishes for a wonderful holiday season.</p> <p>10 Q. Thank you, Mr. Besselsen.</p> <p>11 MR. ROHRBACH: Ms. Drescher, will you turn to the next</p> <p>12 page.</p> <p>13 Q. A moment ago you mentioned an attached list. Is this the</p> <p>14 attached list?</p> <p>15 A. Yes.</p> <p>16 Q. And what sorts of items are on this list, Mr. Besselsen?</p> <p>17 A. Different types of linens, pillows, blankets, towels,</p> <p>18 sheets, shams.</p> <p>19 Q. Mr. Besselsen, while you've been at Interlochen have you</p> <p>20 been familiar with the Epstein Scholarship Lodge?</p> <p>21 A. Yes.</p> <p>22 Q. Does it have any other names?</p> <p>23 A. Yes, it does.</p> <p>24 Q. What are the names?</p> <p>25 A. The name is Green Lake Lodge.</p>



<p>LC1VMAX7 Besselsen - direct Page 664</p> <p>1 Q. And what is this lodge, the Green Lake Lodge?</p> <p>2 A. It's a two-bedroom home, formerly known as the Jeffrey</p> <p>3 Epstein Scholarship Lodge.</p> <p>4 MR. ROHRBACH: Ms. Drescher, would you display for the</p> <p>5 witness, the Court, and counsel what's been marked for</p> <p>6 identification as Government Exhibit 745.</p> <p>7 Q. Mr. Besselsen, what is this?</p> <p>8 A. This is the Green Lake Lodge, formerly known as the Jeffrey</p> <p>9 E. Epstein Scholarship Lodge.</p> <p>10 Q. Is this a fair and accurate photo of the lodge?</p> <p>11 A. Yes.</p> <p>12 MR. ROHRBACH: The government offers 745.</p> <p>13 MS. STERNHEIM: No objection.</p> <p>14 THE COURT: GX-745 is admitted.</p> <p>15 (Government's Exhibit 745 received in evidence)</p> <p>16 MR. ROHRBACH: Ms. Drescher, will you publish this,</p> <p>17 with the Court's permission.</p> <p>18 THE COURT: You may.</p> <p>19 MR. ROHRBACH: Ms. Drescher, you can take it down.</p> <p>20 I'd now like to turn to Government Exhibit 744, which</p> <p>21 I believe is in the heavier of the juror binders. So if I</p> <p>22 could ask the Court to permit the jury to take out the binder?</p> <p>23 THE COURT: It's already admitted?</p> <p>24 MR. ROHRBACH: Yes, your Honor.</p> <p>25 THE COURT: All right. Without objection,</p>	<p>LC1VMAX7 Besselsen - direct Page 666</p> <p>1 would be -- the completion would be the May of that year, so</p> <p>2 May of 1999 and May of 2000.</p> <p>3 MR. ROHRBACH: With the Court's permission, I'd like</p> <p>4 to turn the jury's attention to Government Exhibit 743, which</p> <p>5 is also in evidence.</p> <p>6 THE COURT: Ms. Sternheim?</p> <p>7 MS. STERNHEIM: No objection.</p> <p>8 THE COURT: The jury may turn to 743 in the same</p> <p>9 binder.</p> <p>10 Q. So, Mr. Besselsen, again, without saying any names or other</p> <p>11 information, I would just ask you to take note of the address</p> <p>12 in the third section on the first page. Do you see this</p> <p>13 address?</p> <p>14 A. Yup.</p> <p>15 Q. All right.</p> <p>16 MR. ROHRBACH: Then with the Court's permission, I'd</p> <p>17 ask the jury to turn to Defense Exhibit J-4 in the defense</p> <p>18 binder which is in evidence.</p> <p>19 And Mr. Besselsen, that is in the binder next to you.</p> <p>20 THE COURT: Ms. Sternheim, without objection?</p> <p>21 MS. STERNHEIM: No objection to whatever is admitted.</p> <p>22 THE COURT: All right. And that's -- the jury is</p> <p>23 looking at J-4; correct?</p> <p>24 MR. ROHRBACH: Yes, your Honor.</p> <p>25 THE COURT: In the smaller binder. J-4 in the smaller</p>
<p>LC1VMAX7 Besselsen - direct Page 665</p> <p>1 Ms. Sternheim?</p> <p>2 MS. STERNHEIM: No objection.</p> <p>3 THE COURT: And you said 744?</p> <p>4 MR. ROHRBACH: 744.</p> <p>5 THE COURT: You may look at in the large binder,</p> <p>6 GX-744, please.</p> <p>7 BY MR. ROHRBACH:</p> <p>8 Q. Mr. Besselsen, you testified earlier that you generated</p> <p>9 this record from Interlochen's database?</p> <p>10 A. Yes.</p> <p>11 Q. How did you do that?</p> <p>12 A. I logged into Salesforce and went to the reports section in</p> <p>13 Salesforce and modified the filters. This is a report that --</p> <p>14 the title of the report is MJS Report. Went to that report and</p> <p>15 created these filters that you see at the top, the last name.</p> <p>16 Q. Just to be clear, without saying the last name, is that the</p> <p>17 filter you ran to generate this report?</p> <p>18 A. Yes.</p> <p>19 Q. Thank you, Mr. Besselsen.</p> <p>20 What does this report show about people with this last</p> <p>21 name's attendance at Interlochen?</p> <p>22 A. It shows which -- which years that they came to either the</p> <p>23 arts camp, which is the education type, the far right column.</p> <p>24 And that would be the summer then, if it relates to arts camp.</p> <p>25 So the summer of '94, '95, and '96. And then the arts academy</p>	<p>LC1VMAX7 Besselsen - direct Page 667</p> <p>1 binder.</p> <p>2 BY MR. ROHRBACH:</p> <p>3 Q. Mr. Besselsen, do you note the address on page 1 of that</p> <p>4 document?</p> <p>5 A. Yes.</p> <p>6 Q. Is it the same address as the address on the prior</p> <p>7 document?</p> <p>8 A. Yes, it is.</p> <p>9 Q. And just to be clear, what is the document we're looking at</p> <p>10 right now?</p> <p>11 A. This is an application for admission to our summer arts</p> <p>12 camp, which would be the summer of 1995.</p> <p>13 Q. And the document we just looked at, Government Exhibit 743,</p> <p>14 what is that document? Again, without saying any names.</p> <p>15 A. That's an application for admission to our arts camp,</p> <p>16 summer of 1994, previous summer.</p> <p>17 Q. And then, Mr. Besselsen, and with the Court's permission,</p> <p>18 the jury, I would ask you to turn to Defense Exhibit J-5, which</p> <p>19 is also in evidence.</p> <p>20 THE COURT: Ms. Sternheim.</p> <p>21 MS. STERNHEIM: No objection.</p> <p>22 THE COURT: You may turn to J-5 in the same small</p> <p>23 binder, please.</p> <p>24 Q. Mr. Besselsen, do you recognize this document?</p> <p>25 A. Yes.</p>

<p>LC1VMAX7                      Besselsen - cross                      Page 668</p> <p>1 Q. What is it, without saying any names?</p> <p>2 A. This is an application for admission to our arts camp in</p> <p>3 the summer of 1996.</p> <p>4 Q. Do you see the -- without saying any identifying</p> <p>5 information, do you see the address in the third section of</p> <p>6 this document?</p> <p>7 A. I do.</p> <p>8 Q. Is that the same address or a different address than the</p> <p>9 other address that you're looking at?</p> <p>10 A. I believe it's a different address.</p> <p>11 Q. Just to be clear, you think it's a different address?</p> <p>12 A. Yes, it's a different address.</p> <p>13 Q. Thank you.</p> <p>14 MR. ROHRBACH: No further questions, your Honor.</p> <p>15 THE COURT: Okay. Thank you.</p> <p>16 Ms. Sternheim?</p> <p>17 MS. STERNHEIM: May I have a moment please?</p> <p>18 THE COURT: You may.</p> <p>19 (Counsel conferred)</p> <p>20 MS. STERNHEIM: Thank you, Judge.</p> <p>21 THE COURT: Do you anticipate more than five minutes?</p> <p>22 MS. STERNHEIM: Maybe less.</p> <p>23 THE COURT: Go ahead.</p> <p>24 CROSS-EXAMINATION</p> <p>25 BY MS. STERNHEIM:</p>	<p>LC1VMAX7                      Besselsen - cross                      Page 670</p> <p>1 people call band camp, that the end is like the equivalent of</p> <p>2 color war for athletic camps?</p> <p>3 A. I'm sorry, I don't have any experience with color war.</p> <p>4 Q. Okay.</p> <p>5 A. I don't know what that term means.</p> <p>6 Q. It's when the performances are; it's the culmination of the</p> <p>7 summer experience. Correct?</p> <p>8 A. That's true, yeah.</p> <p>9 Q. And it is then that performances are going on as opposed to</p> <p>10 classes going on; correct?</p> <p>11 A. The final day there are performances. I'm not sure if the</p> <p>12 entire week is like that or not, but --</p> <p>13 Q. But nonetheless, the donors, especially the major donors,</p> <p>14 come for the performances; correct?</p> <p>15 A. Yes. Some major donors do come to campus for performances.</p> <p>16 Q. And Mr. Epstein certainly was a major donor; correct?</p> <p>17 A. Correct.</p> <p>18 Q. And the invitation for him to have the lodge was for the</p> <p>19 period of time which is the culmination of the summer program;</p> <p>20 correct?</p> <p>21 A. That would be correct, I would imagine, yes.</p> <p>22 MS. STERNHEIM: May I have one moment, Judge?</p> <p>23 THE COURT: Okay.</p> <p>24 (Counsel conferred)</p> <p>25 MS. STERNHEIM: You're finished. Thank you.</p>
<p>LC1VMAX7                      Besselsen - cross                      Page 669</p> <p>1 Q. Mr. Besselsen, just a few questions for you.</p> <p>2 A. Yes.</p> <p>3 Q. With regard to the --</p> <p>4 THE COURT: Take off your mask.</p> <p>5 MS. STERNHEIM: Thank you.</p> <p>6 Q. With regard to the applications that have been put in</p> <p>7 evidence, did you produce to the government who paid for that</p> <p>8 student?</p> <p>9 A. I did not provide that to the government; so no, I'm not</p> <p>10 aware that we did provide that.</p> <p>11 Q. Because you do not have those records; correct?</p> <p>12 A. I believe that's correct, going back that far.</p> <p>13 Q. And you don't have records for the siblings of that</p> <p>14 individual either; correct?</p> <p>15 A. I believe so.</p> <p>16 Q. And that would be for the years of attendance of those</p> <p>17 three siblings, 1994, 1995, and 1996; correct?</p> <p>18 A. Correct.</p> <p>19 Q. Now, with regard to Mr. Epstein's invitation to come to the</p> <p>20 lodge, it was for the end of August; correct?</p> <p>21 A. I believe the letter mentioned from Interlochen's vice</p> <p>22 president of advancement that we were having the final concert</p> <p>23 for our arts camp, I think it was August 7 or the week of</p> <p>24 August 7, I believe.</p> <p>25 Q. And is it fair to say that in Interlochen, which some</p>	<p>LC1VMAX7                      Page 671</p> <p>1 THE WITNESS: Oh, thank you.</p> <p>2 THE COURT: All right. Mr. Rohrbach?</p> <p>3 MR. ROHRBACH: No redirect. Thank you.</p> <p>4 THE COURT: All right.</p> <p>5 Mr. Besselsen, you may step down. You are excused.</p> <p>6 (Witness excused)</p> <p>7 THE COURT: And that gets us at 5:02, jury. I</p> <p>8 apologize for keeping you a little bit late.</p> <p>9 I will remind you of all of my instructions, of</p> <p>10 course. Please keep them in mind. Same schedule for tomorrow.</p> <p>11 Thank you for your continued attention and diligence. Have a</p> <p>12 great night. See you tomorrow morning.</p> <p>13 (Jury not present)</p> <p>14 THE COURT: You may be seated.</p> <p>15 Matters to take up, Mr. Rohrbach?</p> <p>16 MR. ROHRBACH: Nothing from the government, your</p> <p>17 Honor.</p> <p>18 THE COURT: Ms. Sternheim?</p> <p>19 MS. COMEY: I apologize, your Honor. We do have an</p> <p>20 issue. We will need to take it up at sidebar because it</p> <p>21 relates to a pseudonym issue.</p> <p>22 THE COURT: Okay. Sidebar pseudonym issue.</p> <p>23 MS. COMEY: It will be brief, your Honor.</p> <p>24 (Pages 672 SEALED)</p> <p>25 (Continued on next page)</p>

LC1VMAX7 Page 673

1 (At sidebar - not sealed)  
2 THE COURT: Okay. See you 8:45.  
3 The only thing I wanted to -- this isn't sealed. But  
4 timing, if you're going to brief piercing the privilege.  
5 MR. PAGLIUCA: When would you like it, your Honor?  
6 THE COURT: A month ago.  
7 MS. STERNHEIM: We can turn back the hands of time.  
8 THE COURT: I wish we could.  
9 MS. STERNHEIM: I don't think you would.  
10 We might, but not you.  
11 MR. PAGLIUCA: I think it's a little more complicated  
12 than -- I think there are different issues related to different  
13 potential witnesses, I guess is the issue.  
14 I'm happy to have it briefed as best we can under the  
15 facts that we know right now, assuming that the Court wants  
16 briefed is the issue we discussed today. Okay. Because then  
17 we may have issues related to lawyer witnesses that are under  
18 subpoena, but will not be called under any circumstances unless  
19 it's briefed and the Court gives permission for the calling of  
20 those witnesses.  
21 THE COURT: Let's start with the limited issue that  
22 was raised today, which is that you would call -- you're  
23 seeking to call Glassman.  
24 MR. PAGLIUCA: Glassman.  
25 THE COURT: You're seeking to call Glassman on the

LC1VMAX7 Page 674

1 narrow question of whether under theory of waiver he told Jane  
2 that it would -- testifying would help her in her case.  
3 When would you like to do that?  
4 MR. PAGLIUCA: How about Friday, your Honor?  
5 THE COURT: This would be a witness you would call in  
6 your case-in-chief?  
7 MR. PAGLIUCA: Exactly. So it's at least a week from  
8 now, I would imagine. I'm assuming the government has about a  
9 week more of testimony, by my review of the witness list.  
10 MS. COMEY: Your Honor, I think that's right. We're  
11 unlikely to rest in less than a week from now.  
12 THE COURT: So is Friday okay?  
13 MR. ROHRBACH: We can respond on Monday, if that's all  
14 right.  
15 THE COURT: Sure. Great.  
16 It will provide some general background on piercing  
17 privilege and waiver to the extent that will inform issues  
18 beyond the specific.  
19 MR. PAGLIUCA: To the extent we can preview the  
20 additional issues, we'll get that underway as well so that you  
21 have a sense of what may or may not be coming down the road  
22 here.  
23 THE COURT: Okay. Can I ask, thinking about timing,  
24 now that we're where we are, what is your estimate for the  
25 trial?

LC1VMAX7 Page 675

1 MS. COMEY: Your Honor, I think it depends on the  
2 length of cross-examination for some of the more substantial  
3 witnesses. If we can expect about the same length as we have  
4 with Jane today, I expect we'll be able to rest the third week  
5 of trial. So not next week, but the week after, early that  
6 week is my best estimate.  
7 THE COURT: And what's the defense's best estimate?  
8 MS. STERNHEIM: We'll let you know.  
9 MR. PAGLIUCA: I'm going to suspect the length of  
10 cross-examination will be less for the remaining witnesses.  
11 THE COURT: We worked out some --  
12 MR. PAGLIUCA: Kinks, yes.  
13 But I just think substantively it's likely to be less,  
14 and there's likely -- well, with the exception of one, there's  
15 less 3500 impeachment material that needs to be gone through  
16 potentially, so I think that will shorten the length of  
17 cross-examination. And we will have whatever we need to have  
18 ready to go, understanding the format we're doing this in now.  
19 THE COURT: All right. See you in the morning.  
20 (Adjourned to December 2, 2021 at 8:45 a.m.)  
21  
22  
23  
24  
25

LC1VMAX7 Page 676

INDEX OF EXAMINATION	
Examination of:	Page
JANE	
Cross By Ms. Menninger . . . . .	429
Redirect By Ms. Moe . . . . .	600
MATT	
Direct By Ms. Moe . . . . .	630
DANIEL ALAN BESSELSSEN	
Direct By Mr. Rohrbach . . . . .	653
Cross By Ms. Sternheim . . . . .	668
DEFENDANT EXHIBITS	
Exhibit No.	Received
J-4 . . . . .	436
J-5 . . . . .	440
J-15 . . . . .	599
J-8 and J-9 . . . . .	600
GOVERNMENT EXHIBITS	
Exhibit No.	Received
17 . . . . .	631
741 . . . . .	657
743 . . . . .	659
744 . . . . .	660
745 . . . . .	664

25

	<b>acceptable (1)</b> 641:25	<b>Adjourned (1)</b> 675:20	571:4	422:3,9;506:13
<b>\$</b>	<b>accepted (1)</b> 659:23	<b>Administration (1)</b> 657:24	<b>affect (2)</b> 570:1;574:15	<b>agreeing (1)</b> 416:15
<b>\$100,000 (1)</b> 655:9	<b>access (1)</b> 430:11	<b>administrative (1)</b> 628:10	<b>affirmative (5)</b> 411:19,24;412:13, 19;413:5	<b>agreement (13)</b> 414:5,21;417:6,7; 560:1,11;561:6; 567:15;575:17;608:7, 10,11;625:19
<b>\$2- (1)</b> 534:2	<b>accounts (2)</b> 654:1,2	<b>admired (1)</b> 444:16	<b>afford (1)</b> 541:13	<b>agreements (1)</b> 560:20
<b>\$2,000 (3)</b> 552:18,21,23	<b>accuracy (1)</b> 602:6	<b>admissibility (3)</b> 418:2;428:5;565:24	<b>afternoon (4)</b> 630:8,9;653:3,4	<b>agrees (2)</b> 414:25;417:24
<b>\$200,000 (2)</b> 655:9;661:23	<b>accurate (7)</b> 410:10;414:1; 455:17;487:23;556:24; 557:1;664:10	<b>admissible (6)</b> 416:25;424:2; 426:11;483:6;484:13; 567:17	<b>afterwards (1)</b> 477:13	<b>ahead (23)</b> 413:7;414:14; 427:14;433:9;452:13; 468:21;473:8;474:7; 481:12;482:2,7; 496:24;500:9;501:19; 505:14;586:9;607:7, 14;614:14;646:13; 650:2;652:24;668:23
<b>\$25 (3)</b> 483:22;484:1,17	<b>accusations (1)</b> 592:7	<b>admission (12)</b> 417:14;436:9; 439:23;486:14;487:22; 559:5;610:3,24; 658:22;667:11,15; 668:2	<b>again (37)</b> 413:4;415:6;416:4, 10;419:25;420:6; 425:24;429:11;435:16; 437:5;438:1,20; 440:15;447:12,17; 450:6;478:4,6;485:12; 486:14,24;501:24; 504:8;507:24;509:18; 512:23;514:3;523:17; 547:24;622:18;623:1; 646:14;657:24;659:5; 661:21;666:10;667:14	<b>aid (7)</b> 429:14;430:25; 437:6,16;441:9; 566:19;576:12
<b>\$25,000 (3)</b> 541:5,16,17	<b>accused (1)</b> 650:21	<b>admits (1)</b> 424:6	<b>against (9)</b> 487:13;555:19; 557:11;558:6;578:5; 581:5;583:1;584:8; 598:11	<b>airport (3)</b> 531:18;550:7,9
<b>\$250,000 (1)</b> 541:11	<b>accusers (2)</b> 547:4,10	<b>admissions (5)</b> 483:17;520:14,23; 521:6;659:20	<b>age (6)</b> 431:19;517:19; 518:2;532:9;537:24; 624:17	<b>ALAN (1)</b> 652:21
<b>\$300 (1)</b> 534:2	<b>acknowledging (1)</b> 648:25	<b>admit (1)</b> 488:3	<b>agent (14)</b> 463:2,15,16;465:5,8, 11,19;538:18;542:14; 587:21;588:20,23,24; 589:1	<b>alarming (1)</b> 506:6
<b>\$343 (2)</b> 580:5,7	<b>acting (9)</b> 431:15;483:15; 485:3;486:15;535:19; 587:7;615:17,21,23	<b>admonished (1)</b> 436:17	<b>agents (4)</b> 421:11;452:15; 468:15;527:21	<b>alert (1)</b> 425:25
<b>\$4,025 (1)</b> 442:19	<b>actions (2)</b> 487:22;586:21	<b>admitted (21)</b> 430:8,10;436:14,14; 440:1,1,4;473:3;588:2; 599:9;600:2;628:11, 13;629:1;631:5; 657:14;659:12;660:19; 664:14,23;666:21	<b>agents' (1)</b> 420:25	<b>alerted (1)</b> 631:9
<b>A</b>	<b>active (1)</b> 574:10	<b>admits (1)</b> 424:6	<b>agent's (4)</b> 415:4;421:1,2,7	<b>alerting (1)</b> 467:10
<b>ability (1)</b> 488:16	<b>actor (10)</b> 548:18;586:12,14, 18,23;587:2;615:14; 632:12,15,19	<b>admission (12)</b> 417:14;436:9; 439:23;486:14;487:22; 559:5;610:3,24; 658:22;667:11,15; 668:2	<b>Ages (7)</b> 429:22;516:12; 532:8;623:12,14,18; 624:22	<b>allegations (3)</b> 540:1;636:6;637:5
<b>able (11)</b> 413:13,25;414:12; 422:6;541:13;591:13; 603:1;620:19;639:24; 640:7;675:4	<b>actress (1)</b> 538:23	<b>admits (1)</b> 424:6	<b>ago (11)</b> 414:17;449:24,25; 460:23,23,23;540:23; 592:3;628:4;663:13; 673:6	<b>alleged (1)</b> 596:15
<b>above (5)</b> 430:24;437:5,16; 613:1;624:16	<b>actual (1)</b> 524:15	<b>admits (1)</b> 424:6	<b>agree (16)</b> 416:13;417:1,13; 427:13;465:15,23; 489:5;497:14;567:23; 569:4,14;576:15; 607:11;608:13;624:5; 625:16	<b>allow (11)</b> 522:21;540:5; 570:21;572:12;584:19; 624:9;625:22;637:11; 638:4,5;643:23
<b>abroad (7)</b> 550:12,16;551:8,10, 19;552:3;606:15	<b>actually (9)</b> 432:13;533:8,8; 588:11,22;589:14; 592:13;594:8;609:24	<b>admits (1)</b> 424:6	<b>agreed (3)</b>	<b>allowed (1)</b> 417:11
<b>absolutely (2)</b> 602:21;612:6	<b>Adam (2)</b> 518:20;531:1	<b>admits (1)</b> 424:6		<b>allowing (2)</b> 659:13;660:20
<b>abuse (18)</b> 455:20;456:12; 477:7,8;498:4;503:6; 513:8,24;514:4,20; 515:14,18;516:3; 526:11;598:13;619:14; 649:6,19	<b>add (1)</b> 483:24	<b>admits (1)</b> 424:6		<b>almost (4)</b> 523:4;524:1;533:22; 559:10
<b>abused (15)</b> 497:3,13,18,21; 502:21;503:2;558:1; 617:3,24;619:2; 636:13;648:25;649:2, 12,15	<b>addition (3)</b> 426:3;427:7;662:25	<b>admits (1)</b> 424:6		<b>alone (5)</b> 448:13;471:21,24; 478:9;479:7
<b>abusive (1)</b> 534:5	<b>additional (9)</b> 559:25;568:3,8; 570:15;602:12;627:18; 641:23;661:5;674:20	<b>admits (1)</b> 424:6		<b>along (2)</b> 483:8,10
<b>Academy (5)</b> 605:19;658:5,9; 661:12;665:25	<b>address (35)</b> 409:2;410:12,23; 411:11;415:14;418:8, 17,19,23;419:12,15,21, 22;420:2,3,4;427:17; 428:4;432:14;439:1,2; 440:19,22;666:11,13; 667:3,6,6;668:5,8,8,9, 10,11,12	<b>admits (1)</b> 424:6		<b>although (1)</b> 511:9
<b>accept (1)</b> 486:13	<b>addressed (2)</b> 410:18;622:8	<b>admits (1)</b> 424:6		<b>always (10)</b> 428:3;434:19,22; 467:17;506:6,7;578:9;

591:14;593:7;622:18 <b>Amanda (1)</b> 542:14 <b>Amazing (1)</b> 438:10 <b>ambiguity (1)</b> 624:7 <b>ambiguous (1)</b> 567:8 <b>Ambrose (1)</b> 662:6 <b>amended (2)</b> 488:14,15 <b>amendment (2)</b> 488:20,21 <b>American (3)</b> 452:23;453:1;531:17 <b>amount (7)</b> 487:6;541:14;560:7, 12,13;580:4;591:11 <b>Andrew (1)</b> 530:21 <b>Angeles (6)</b> 457:2,5,7;579:22; 589:23,25 <b>annual (1)</b> 434:21 <b>anonymity (4)</b> 424:21;481:16,21; 490:14 <b>anonymous (2)</b> 608:15,16 <b>answered (11)</b> 499:24;500:4; 505:10;508:12;515:19; 522:19;584:21;598:5; 609:5;611:20;651:22 <b>anticipate (7)</b> 425:23;427:19; 577:9;579:4,5,6; 668:21 <b>anticipated (1)</b> 408:4 <b>apart (1)</b> 489:17 <b>apartment (1)</b> 533:5 <b>apartments (1)</b> 517:15 <b>aperture (1)</b> 488:25 <b>Apologies (5)</b> 423:9;433:7;467:7; 549:18;631:8 <b>apologize (17)</b> 419:2;440:4;460:2; 467:14;468:10;498:24; 499:5,6;504:17,20; 505:1,21;583:11; 593:12;652:17;671:8, 19 <b>apparent (1)</b> 410:18	<b>apparently (2)</b> 612:1;662:20 <b>appear (2)</b> 426:10;488:19 <b>appears (3)</b> 426:5,7;568:24 <b>applicant (3)</b> 612:25;613:5;614:6 <b>application (33)</b> 419:21;420:1; 430:22;433:24;434:8; 435:23;436:4,24; 437:13;439:1,2,18; 440:19;441:2;584:14; 610:24;611:5,9,14; 612:2,22;613:9;614:5, 16,24;615:3,6;658:22; 659:2,8;667:11,15; 668:2 <b>applications (10)</b> 420:15;429:12; 442:23;496:13;610:3, 7;612:8;658:8,8;669:6 <b>applied (2)</b> 521:3;611:2 <b>apply (3)</b> 431:7;487:20;488:19 <b>applying (6)</b> 430:25;437:6,16; 440:17;441:8,11 <b>appointments (2)</b> 454:1,11 <b>appreciate (6)</b> 424:21,23;428:18; 490:8;545:18;621:6 <b>appreciated (2)</b> 421:24;425:21 <b>approach (4)</b> 424:15;528:9;563:5; 583:14 <b>approached (7)</b> 443:13;444:13; 445:12;446:1;541:21; 542:2;607:2 <b>appropriate (6)</b> 427:5;481:1,17; 486:11;560:15;570:2 <b>approximately (16)</b> 453:4;456:20,22; 595:3;606:3;609:7; 633:22;634:5,7;640:2; 642:9;645:16,18; 647:16,17;650:7 <b>April (9)</b> 442:9;500:12; 502:20;550:11,14,20; 551:23;552:1;580:7 <b>area (5)</b> 441:22;458:19,22; 481:2;625:9 <b>argue (1)</b> 624:13 <b>arguing (5)</b>	560:9;564:8,9,10; 571:10 <b>argument (8)</b> 415:18;427:18; 489:23;507:12;560:16; 561:18;573:2;578:8 <b>arise (1)</b> 425:24 <b>arises (2)</b> 423:7;426:1 <b>arising (1)</b> 427:20 <b>arm (1)</b> 443:19 <b>arose (1)</b> 566:23 <b>around (15)</b> 415:3;421:18; 512:13;513:23;518:14; 519:2;532:11;540:11; 553:12;555:2;568:25; 587:10;596:7;602:25; 617:18 <b>arranged (1)</b> 453:12 <b>arrangements (5)</b> 531:23;532:10; 627:4,6,7 <b>array (1)</b> 426:10 <b>arrest (1)</b> 519:8 <b>arrested (5)</b> 539:3;542:13;651:5, 10,12 <b>arrives (1)</b> 663:7 <b>articles (3)</b> 427:4,15,16 <b>articulated (1)</b> 561:3 <b>artists (3)</b> 428:24;629:10;630:3 <b>arts (28)</b> 431:12;433:22; 434:19;435:25;437:24; 441:14;442:4;503:21; 504:1;519:22;582:18; 589:6,11;605:17,19; 653:6,7,8,9,11,12; 665:23,24,25;667:11, 15;668:2;669:23 <b>ashamed (2)</b> 608:22;646:19 <b>aside (1)</b> 417:25 <b>aspects (2)</b> 624:2;635:6 <b>assault (1)</b> 598:13 <b>assistance (2)</b> 556:13;567:20 <b>assistant (3)</b>	453:16;653:23,24 <b>associate (1)</b> 608:25 <b>associated (3)</b> 519:21;552:13;580:2 <b>assume (3)</b> 490:9;549:9;636:9 <b>assumed (2)</b> 489:24;626:18 <b>assuming (2)</b> 673:15;674:8 <b>athletic (1)</b> 670:2 <b>attached (5)</b> 517:1;659:7;663:2, 13,14 <b>attachment (1)</b> 557:20 <b>attack (1)</b> 409:13 <b>attacked (4)</b> 577:15;636:21,23; 637:22 <b>Attacking (1)</b> 638:8 <b>attempted (1)</b> 598:10 <b>attempting (1)</b> 416:5 <b>attend (1)</b> 550:18 <b>attendance (3)</b> 441:14;665:21; 669:16 <b>attending (1)</b> 434:21 <b>attention (19)</b> 426:2;428:18; 434:11;445:21;477:23; 497:23;498:15;499:7; 513:16;514:2;522:1; 550:4;611:9,15; 612:24;614:8;633:9; 666:4;671:11 <b>attest (1)</b> 556:23 <b>attested (1)</b> 557:1 <b>attorney (50)</b> 423:3;464:11;482:9, 10;483:14;484:12; 485:3,9,21;486:20; 487:8;507:6;508:24; 509:9,20;510:8,24; 511:3,6,16;540:9; 542:23;558:15;563:17, 21,24;564:2,5,7;565:1, 15,18,20;566:1,2; 568:25;569:1,12,17,24; 570:14;571:3,4; 580:22;593:3;597:25; 598:5;604:1;609:19,23 <b>Attorney-client (5)</b>	543:20;561:19; 564:24;569:15;570:13 <b>attorneys (7)</b> 446:16;482:20; 484:10;489:19,25; 566:7;580:25 <b>attorney's (5)</b> 485:1;567:19; 568:18;569:23;571:2 <b>audible (1)</b> 435:4 <b>audience (2)</b> 586:19,25 <b>auditors (1)</b> 654:5 <b>audits (1)</b> 654:6 <b>August (5)</b> 592:16;662:23; 669:20,23,24 <b>authentication (1)</b> 599:2 <b>authorities (1)</b> 539:7 <b>authority (1)</b> 577:23 <b>authorizes (1)</b> 625:8 <b>available (1)</b> 597:20 <b>avoid (5)</b> 482:20,22;484:8; 548:11;625:3 <b>award (9)</b> 441:13;486:8,8,10, 12,13,19;487:7;618:22 <b>awards (2)</b> 429:14,17 <b>aware (14)</b> 429:14,17;483:9; 484:14;488:11;531:8; 543:10;548:20;569:1, 12,25;570:7;663:4; 669:10 <b>awareness (2)</b> 490:2;566:10 <b>away (14)</b> 409:18;449:10; 496:9;541:4;548:17; 587:8;595:7,8,9; 619:15;633:18;639:16; 656:18,19
<b>B</b>				
<b>back (34)</b> 411:4;444:8;448:17, 21;451:1,16;452:20; 454:13;475:17;477:21; 480:9;486:21;527:18; 531:20;537:7;544:6; 548:25;558:15;559:11, 16;567:9;579:9,20;				

582:11;588:11;596:14; 602:17;604:15;612:23; 619:1;635:2;658:8; 669:12;673:7 <b>background (3)</b> 434:19;435:6;674:16 <b>banc (1)</b> 489:12 <b>band (2)</b> 611:17;670:1 <b>banks (1)</b> 654:5 <b>bar (1)</b> 487:21 <b>barred (1)</b> 409:14 <b>based (9)</b> 416:24;426:6; 464:22;544:25;546:19; 548:14,17;643:3; 647:10 <b>basement (1)</b> 656:18 <b>basic (1)</b> 487:14 <b>basically (9)</b> 486:10;607:12; 612:20;639:11,13,19; 640:8,10;644:6 <b>basis (15)</b> 409:21;416:16; 417:18;418:5;420:7; 427:14;565:2,24; 566:18;567:12;569:5; 573:3;575:1;595:23; 635:17 <b>bathing (1)</b> 535:11 <b>bathroom (1)</b> 517:2 <b>battled (1)</b> 590:18 <b>Beach (13)</b> 418:17;433:21; 437:23;449:12,13; 451:5,9;497:8,10; 516:14,17;582:18; 604:7 <b>beachy (1)</b> 516:21 <b>Bear (3)</b> 421:5;440:23;454:18 <b>beauty (1)</b> 552:7 <b>became (2)</b> 566:21;603:11 <b>become (2)</b> 456:15;603:7 <b>becomes (1)</b> 564:25 <b>bed (2)</b> 639:22,23 <b>began (5)</b>	419:8;459:17; 523:13,18;587:20 <b>begin (4)</b> 408:8,9;426:15; 629:25 <b>beginning (17)</b> 418:15;426:18; 451:24;452:8,16; 454:25;455:9;474:3,9; 479:21;481:24;517:18; 522:8,17;538:11; 593:7;616:25 <b>begins (3)</b> 434:16;479:15; 501:10 <b>behalf (2)</b> 485:3;486:21 <b>behavior (1)</b> 598:13 <b>behind (1)</b> 537:4 <b>believ (1)</b> 610:12 <b>believability (1)</b> 413:15 <b>believes (1)</b> 462:3 <b>bell (1)</b> 597:11 <b>below (3)</b> 431:21;438:1;655:8 <b>bench (2)</b> 448:10,13 <b>benefit (6)</b> 570:19;575:20; 576:5;578:4;581:4,9 <b>Besselsen (29)</b> 652:12,14,21;653:3, 5;656:3,11;657:17; 659:16;660:23;661:3, 20;662:1,5,10,16; 663:10,16,19;664:7; 665:8,19;666:10,19; 667:3,17,24;669:1; 671:5 <b>best (5)</b> 609:25;663:9; 673:14;675:6,7 <b>better (2)</b> 575:18;578:9 <b>beyond (7)</b> 411:5;482:24; 485:18;622:25;623:6; 647:5;674:18 <b>bias (10)</b> 483:6;484:14;487:1, 12,13;488:18;489:2; 564:23;565:14;568:20 <b>big (4)</b> 456:15;552:11,12; 605:5 <b>bills (3)</b> 640:10;641:13,14	<b>binder (26)</b> 424:16;426:10,12; 429:12;430:12,17; 432:19;437:11;440:10; 468:6;610:19;628:24; 631:19;632:21;633:2; 656:11;658:17;660:3; 664:22;665:5;666:9, 18,19,25;667:1,23 <b>binders (19)</b> 424:2,13;426:4,15, 18;435:14;439:9; 443:4;467:3,19;496:9, 14;610:16;631:15,18; 632:6;633:17,18; 664:21 <b>binding (2)</b> 434:20;598:23 <b>birth (2)</b> 549:19;633:11 <b>birthday (10)</b> 592:16;594:22,24; 595:1,10,13,17,24,24; 616:16 <b>bit (5)</b> 458:15;576:20; 580:17;581:12;671:8 <b>black (2)</b> 518:4;607:16 <b>blackmailed (1)</b> 607:12 <b>blanket (1)</b> 427:11 <b>blankets (1)</b> 663:17 <b>blond (1)</b> 524:17 <b>blood (1)</b> 578:25 <b>blue (1)</b> 461:24 <b>board (1)</b> 433:21 <b>boarding (3)</b> 531:15;605:19; 653:10 <b>body (1)</b> 586:21 <b>book (2)</b> 463:21;607:16 <b>booked (1)</b> 589:9 <b>borrowed (1)</b> 586:23 <b>Boston (1)</b> 457:11 <b>Both (9)</b> 411:22;447:22; 496:14;544:20;570:22; 586:3;618:8;626:22; 635:18 <b>bottom (6)</b> 440:25;497:25;	549:22;550:4;593:13; 611:10 <b>bought (1)</b> 535:6 <b>bound (2)</b> 488:22;489:16 <b>box (3)</b> 441:5,6,8 <b>boyfriend (1)</b> 458:4 <b>boyfriends (5)</b> 457:25;458:2,3,7,12 <b>Brad (1)</b> 546:24 <b>bragged (1)</b> 510:21 <b>branch (1)</b> 572:16 <b>break (20)</b> 422:3;425:9,17; 443:22;481:2,3,5,25; 505:12;545:17;559:8, 9,12;561:16;620:6,6, 10;621:4,9;652:18 <b>Brian (4)</b> 444:6,12,15,18 <b>bridge (2)</b> 485:10;489:25 <b>bridges (1)</b> 486:1 <b>brief (8)</b> 459:12;490:14; 571:13,15;572:19; 573:3;671:23;673:4 <b>briefed (5)</b> 487:15;561:23; 673:14,16,19 <b>briefing (3)</b> 573:7,11;626:13 <b>briefly (6)</b> 442:15;608:11; 621:14;626:12;635:23; 660:23 <b>bring (14)</b> 425:9;426:1,15; 428:7,12,13;496:7,8; 579:9;628:6,9,10; 629:13;637:3 <b>bringing (3)</b> 426:13;623:21; 649:13 <b>British (1)</b> 526:13 <b>broad (4)</b> 416:4;417:2,5,7 <b>Broadly (2)</b> 572:5;575:11 <b>Broadway (8)</b> 438:9;504:2;509:10; 510:10,15,17;511:11; 594:5 <b>broke (2)</b> 634:12;639:14	<b>brother (10)</b> 444:6,6,12,15,21; 445:1;451:25;518:18; 530:23;648:18 <b>brothers (13)</b> 430:5;435:1,5; 441:21;442:3;452:16; 454:21;534:8,19; 553:23;604:21;605:6; 639:21 <b>brother's (1)</b> 605:19 <b>brought (4)</b> 622:2,4;626:1,2 <b>brutal (1)</b> 647:12 <b>build (1)</b> 656:10 <b>building (3)</b> 656:8;657:24;661:6 <b>built (1)</b> 413:3 <b>bullied (1)</b> 590:16 <b>bullying (1)</b> 541:19 <b>burden (1)</b> 561:2 <b>business (5)</b> 654:8,10;655:23; 657:17;660:1
<b>C</b>				
<b>cabin (1)</b> 658:6 <b>cabined (1)</b> 483:10 <b>cabinet (1)</b> 656:18 <b>California (1)</b> 446:9 <b>call (19)</b> 409:16;421:11; 454:6,8;522:12; 538:24;539:10;542:6, 16;571:3;591:9; 623:19;629:17;652:11; 670:1;673:22,23,25; 674:5 <b>called (15)</b> 412:12;421:5;429:5; 448:22;454:1,11; 519:11;523:2;531:23; 597:7;607:3;629:23; 649:7;652:22;673:18 <b>calling (19)</b> 453:15,16;531:25; 532:9,13,18;538:4,5; 546:12;548:14,15,15, 15,16;569:25;570:6; 572:19;577:9;673:19 <b>calls (4)</b>				

538:6,8;629:18; 652:12 <b>calm (1)</b> 509:16 <b>came (19)</b> 435:5;443:14;447:2, 9;454:15,20;455:3; 456:11;504:4;566:22; 594:8,24;604:16; 635:3;640:2,24,24; 641:3;665:22 <b>cameras (2)</b> 553:6,12 <b>Camp (27)</b> 435:25;441:15; 442:16;448:17;604:16; 605:18;613:12;614:16; 616:7,10,13,18,22; 644:18;653:9;658:5,6, 7,22;662:23;665:23, 24;667:12,15;668:2; 669:23;670:1 <b>camper (1)</b> 658:9 <b>campers (1)</b> 661:12 <b>camper's (1)</b> 659:6 <b>camps (1)</b> 670:2 <b>campus (8)</b> 654:3;656:9;661:7, 12,13,23;663:6;670:15 <b>can (122)</b> 411:11;414:20,21; 415:6;417:20;420:6, 12;421:12;422:19,22; 423:10,12,23;424:12, 13,18;425:25;427:1,23, 23;428:13;433:3; 435:14;437:7;444:8; 447:6,16;448:3,5; 451:7;452:3;459:14; 460:24;461:9,15; 462:24;463:1,4,8,9,9, 10;465:3;467:1,5; 469:17;472:14;477:1, 18;481:3;485:22; 496:7,8;499:7;500:8; 505:16;506:16;507:25; 508:2;510:4,5;523:17; 529:10;532:23;545:15, 16;547:8,23;559:15, 16;561:20;567:17; 569:5;570:1;574:24; 575:14;576:22,23; 578:17;579:8,9; 580:13;581:21;585:10, 22;586:8;588:11; 595:16;598:25;602:19; 605:1,14;607:1; 609:22;615:10,11; 617:8;619:5,13,20;	621:2;625:9;627:16, 18;628:18;629:13; 632:2;636:24;641:23; 648:21;650:17,24; 652:18;661:12;662:25; 664:19;673:7,14; 674:13,19,23;675:3 <b>cancer (1)</b> 590:18 <b>candid (1)</b> 627:9 <b>capable (1)</b> 655:6 <b>capacity (4)</b> 483:16;486:15; 654:7;655:9 <b>caption (1)</b> 597:21 <b>car (5)</b> 521:15;522:14; 590:20;609:11,14 <b>career (2)</b> 438:2;615:14 <b>careful (1)</b> 611:6 <b>carrying (1)</b> 602:25 <b>cartel (1)</b> 591:5 <b>case (84)</b> 411:17,20,22;412:7, 14,19;413:12,16,17,24, 25;414:12;416:3,19,19, 20,25;418:5;435:4; 460:22;483:15,16,18, 24;484:2;486:15,16; 487:13;488:9,11,18; 489:11;547:18;548:3; 554:22;556:8;557:3, 18;560:2;564:20,20, 22;566:15,16,19,20,24; 567:1,4,5,8;569:3; 570:1,8,12,18,25; 571:5,6;572:7,21; 574:4,6,10,13,14,22; 575:3,3,10,12,19; 576:6;580:18,18; 592:7;597:6,7,21; 623:9,21;637:1,5; 674:2 <b>case-in-chief (10)</b> 408:20;409:12,17; 412:3,15;413:5,18; 414:11,24;674:6 <b>cases (6)</b> 411:25;414:22; 415:16,21;487:23; 488:12 <b>cash (2)</b> 534:9;605:16 <b>casual (1)</b> 618:4 <b>Center (2)</b>	653:6,7 <b>central (4)</b> 413:16,17;416:2; 637:13 <b>certain (4)</b> 410:12;412:9; 421:23;549:14 <b>certainly (8)</b> 411:1;435:10;490:7; 560:21;572:1;627:23; 628:19;670:16 <b>certificate (1)</b> 633:11 <b>certified (2)</b> 583:19;585:23 <b>chairs (2)</b> 424:4;430:12 <b>chance (4)</b> 421:10;425:3,21; 426:5 <b>change (2)</b> 489:14;616:25 <b>changed (5)</b> 461:5,9;488:17; 503:5;618:4 <b>changes (1)</b> 489:11 <b>character (5)</b> 408:23;409:14; 586:14,18;590:11 <b>characterized (1)</b> 590:5 <b>characterizing (3)</b> 498:17,21;522:3 <b>characters (1)</b> 591:15 <b>charged (3)</b> 539:5;556:8;654:24 <b>charitably (1)</b> 409:16 <b>charity (1)</b> 434:21 <b>chauffeur (1)</b> 452:23 <b>check (4)</b> 422:25;432:25; 628:18,20 <b>checked (3)</b> 431:3;437:17;441:15 <b>checking (1)</b> 419:20 <b>Chef (2)</b> 518:20;533:13 <b>chessboard (1)</b> 564:15 <b>child (2)</b> 413:21;434:17 <b>childhood (3)</b> 410:9;413:10,17 <b>Children's (6)</b> 434:3;521:5;589:7; 614:25;615:4,7 <b>chitchatted (1)</b>	443:13 <b>chose (1)</b> 539:17 <b>Christmas (2)</b> 592:1,2 <b>Cir (1)</b> 487:18 <b>Circuit (8)</b> 488:12,15,21,22; 489:8,10,12,16 <b>circumstances (6)</b> 419:9;605:9;607:2; 639:7,16;673:18 <b>cite (1)</b> 415:16 <b>cited (4)</b> 414:22,23;415:17,21 <b>city (4)</b> 442:6;506:23,24; 653:18 <b>civil (46)</b> 448:12;482:21; 483:14,15,23;484:1,17; 485:3;486:15;487:21, 22;488:10,17;489:23; 555:6;556:7;557:18; 559:21;564:20,22; 566:15,20,24;567:13; 568:2;569:7;570:8,12, 18;571:6;572:21; 574:4,6,14;575:3,12, 21;576:13,20;578:4; 581:5;592:18;596:11, 14;597:6,7 <b>claim (23)</b> 443:9;470:21; 471:23;476:24;477:3; 483:23;497:3;521:13; 534:5;535:6;554:11; 555:19;556:13,17,19, 21,23;557:1;558:6; 559:23;574:6;581:9; 582:19 <b>claimed (5)</b> 469:19;483:19; 527:5;535:10;538:25 <b>claiming (2)</b> 463:5;542:7 <b>claims (3)</b> 486:21;558:5,8 <b>clarification (1)</b> 589:12 <b>clarified (2)</b> 451:16;627:25 <b>clarifies (1)</b> 575:7 <b>clarify (9)</b> 418:15;469:17; 512:23;574:8,16; 575:14;581:21;594:15; 626:13 <b>clarifying (2)</b> 419:16;627:22	<b>clarity (3)</b> 560:20;574:1;626:16 <b>classes (5)</b> 431:7;438:24; 443:22;448:13;670:10 <b>clauses (1)</b> 560:10 <b>cleaning (3)</b> 662:13,20,22 <b>clear (30)</b> 411:25;417:15; 423:2;498:22;505:19, 25;529:12;555:3; 561:23;571:15;575:24; 577:20;583:23;600:11; 606:11;610:23;611:14; 612:2;619:1;623:10; 624:13;628:13;629:5; 631:21;651:18;659:25; 660:13;665:16;667:9; 668:11 <b>cleared (1)</b> 626:3 <b>clearly (3)</b> 408:17;537:20; 584:21 <b>CLERK (1)</b> 505:13 <b>client (5)</b> 487:13;564:7;565:6; 567:19;573:7 <b>client's (2)</b> 568:18;573:10 <b>clip (1)</b> 441:18 <b>close (5)</b> 435:14;439:9,10; 443:4;661:13 <b>closer (1)</b> 632:2 <b>closing (2)</b> 624:13;625:15 <b>closure (2)</b> 616:1;619:11 <b>clothes (7)</b> 469:10,18,22;470:1, 5,11;535:5 <b>coach (1)</b> 535:23 <b>cocktail (4)</b> 519:24;520:3,9,17 <b>cocky (1)</b> 612:1 <b>codes (2)</b> 550:7,9 <b>coincidentally (1)</b> 412:11 <b>Coke (1)</b> 579:1 <b>collateral (5)</b> 415:23;416:2,17,23; 462:9 <b>colleagues (1)</b>
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631:8 <b>colloquy (1)</b> 621:21 <b>color (2)</b> 670:2,3 <b>colored (1)</b> 570:3 <b>column (1)</b> 665:23 <b>combination (1)</b> 583:25 <b>combined (4)</b> 583:21;585:21,25; 600:1 <b>Comey (5)</b> 408:14;671:19,23; 674:10;675:1 <b>comfortable (8)</b> 603:7,20;622:22,24; 645:4,17,25;651:20 <b>coming (4)</b> 481:18;570:5;588:4; 674:21 <b>command (1)</b> 591:13 <b>commemorated (1)</b> 590:2 <b>commented (1)</b> 589:16 <b>comments (3)</b> 484:12;658:4,7 <b>commercial (1)</b> 537:1 <b>commercially (1)</b> 579:22 <b>commercials (1)</b> 438:3 <b>commit (1)</b> 598:11 <b>committed (1)</b> 598:10 <b>common (2)</b> 434:19;624:16 <b>communicate (1)</b> 586:18 <b>communicated (12)</b> 509:3,9,20,21; 510:13,24;511:5,23; 564:11;570:14;571:9; 576:5 <b>communicating (1)</b> 510:9 <b>communication (9)</b> 563:16,18,21,23; 564:7;565:1,20;566:1; 569:16 <b>communications (4)</b> 484:15;627:8; 654:11,13 <b>community (3)</b> 421:5;434:22;440:23 <b>comp (2)</b> 576:21,22	<b>companies (1)</b> 654:5 <b>company (1)</b> 438:13 <b>comparable (1)</b> 560:23 <b>compartmentalized (1)</b> 477:11 <b>compensation (10)</b> 482:9;486:7;556:10; 566:23;569:7;578:7; 14;581:10;618:23; 619:12 <b>competed (1)</b> 587:12 <b>competition (2)</b> 442:10;550:18 <b>complaint (4)</b> 556:7;592:18; 596:11,15 <b>complete (1)</b> 496:15 <b>completed (1)</b> 627:2 <b>completely (1)</b> 470:2 <b>completes (1)</b> 659:17 <b>completion (2)</b> 660:11;666:1 <b>compliant (1)</b> 620:15 <b>complicated (3)</b> 488:9;560:1;673:11 <b>complications (1)</b> 488:4 <b>Compound (1)</b> 474:25 <b>computer (2)</b> 534:22;605:16 <b>conceive (1)</b> 427:14 <b>concept (1)</b> 656:8 <b>concerning (2)</b> 598:12;636:6 <b>concerns (2)</b> 426:9,12 <b>concert (1)</b> 669:22 <b>conclude (1)</b> 567:12 <b>conclusion (1)</b> 577:6 <b>conduct (1)</b> 416:11 <b>cone (1)</b> 443:24 <b>confer (19)</b> 422:4;423:3,5,16; 425:4;428:5;438:16; 561:24;565:6;568:4; 571:21;621:2,15;	622:16;628:19,22,25; 629:3;657:6 <b>conferral (1)</b> 421:22 <b>conferred (11)</b> 423:25;424:10; 438:18;442:2;565:4; 568:6;597:4;652:1; 657:9;668:19;670:24 <b>conferring (6)</b> 424:21;425:5; 571:23;572:3;622:15; 627:1 <b>confirm (2)</b> 422:5;526:8 <b>conflict (1)</b> 553:8 <b>confront (2)</b> 647:13;650:4 <b>confrontation (2)</b> 648:11;649:4 <b>confronted (2)</b> 415:5;650:14 <b>confused (3)</b> 416:14;505:1;510:12 <b>confusing (6)</b> 501:25;505:4; 547:22;560:3,8;561:13 <b>confusion (2)</b> 482:20;576:16 <b>connection (2)</b> 529:3;565:23 <b>connotes (1)</b> 623:20 <b>consider (3)</b> 414:23;571:21; 586:12 <b>considered (1)</b> 411:16 <b>consistent (36)</b> 424:4;436:15;440:2, 5;577:5,11,14,14; 620:19;621:17;622:10, 11;623:6,23,23;624:6, 11;625:6,22;626:14; 627:13,18;629:9; 635:19,19;636:24; 637:7,19;648:22; 649:1,5,10,11,18; 659:12;660:19 <b>construction (1)</b> 661:24 <b>contact (6)</b> 476:25;477:4; 519:18;526:17;527:6; 651:13 <b>contacted (2)</b> 542:13;640:25 <b>contacts (2)</b> 626:16;627:9 <b>contain (1)</b> 426:10 <b>contained (2)</b>	424:7;658:2 <b>containing (1)</b> 559:20 <b>contains (1)</b> 559:25 <b>contention (1)</b> 562:2 <b>contents (3)</b> 464:9,11;508:20 <b>contested (1)</b> 637:9 <b>contesting (2)</b> 560:13;637:8 <b>context (5)</b> 488:9,13,16;489:24; 623:5 <b>contingent (1)</b> 543:20 <b>continue (5)</b> 428:20;429:2;506:9; 579:13,16 <b>continued (21)</b> 420:19;429:7; 446:19;447:1;459:18; 466:3;479:23;490:18; 521:21;528:11;529:14; 536:20;552:3;562:5; 599:12;633:24;635:25; 638:9;649:21;671:11, 25 <b>continuously (1)</b> 410:9 <b>contract (1)</b> 543:20 <b>contradicted (2)</b> 414:4,13 <b>contradicting (1)</b> 421:13 <b>contradiction (8)</b> 408:18,19,22; 413:15;415:10;416:24; 418:3;420:5 <b>contradictory (1)</b> 414:13 <b>contradicts (3)</b> 413:19;416:6;417:10 <b>conversation (26)</b> 421:24;450:16,24; 502:17;507:18;522:1; 566:4,5;569:2;593:14; 607:8,9;609:7,13,13, 15,16;622:10;640:2,6; 647:20;649:14,15; 650:7,9,12 <b>conversations (21)</b> 477:21;547:17,25; 566:7;568:25;602:11; 609:23;622:20;623:1; 640:14;643:10,19; 644:19,22,23,25; 645:15,19;646:1,16; 654:19 <b>convey (1)</b>	663:5 <b>conveyed (1)</b> 626:23 <b>convincingly (1)</b> 586:24 <b>cool (1)</b> 526:15 <b>cooperate (6)</b> 554:21;563:22,24; 564:21;574:18;580:18 <b>cooperated (3)</b> 566:16;567:15,17 <b>cooperating (5)</b> 567:4;574:21; 575:10,18;578:3 <b>cooperation (10)</b> 560:19;567:15; 575:2,16,16,17;576:11; 581:2,3,8 <b>copies (2)</b> 585:23;628:24 <b>copy (4)</b> 586:8;610:10; 655:16;656:12 <b>corner (4)</b> 436:2;439:15;544:7; 633:9 <b>correspondence (6)</b> 482:8,10;654:18,19; 655:13,18 <b>corroborate (2)</b> 525:17;537:20 <b>Costuming (1)</b> 431:15 <b>cough (1)</b> 505:25 <b>coughing (1)</b> 505:20 <b>counsel (40)</b> 408:2;421:22,22; 422:5;423:7,13,14; 424:10,21;425:6,8,20; 426:3,7;438:16,18; 442:2;455:24;460:8; 467:2,5;481:7;482:4, 12;565:4,14,16;568:6; 572:4;597:4;614:13, 23;626:14;652:1; 656:1;657:9;661:1; 664:5;668:19;670:24 <b>counsellor (4)</b> 582:3,7;585:15; 648:13 <b>counsellors (1)</b> 658:7 <b>counsel's (1)</b> 422:13 <b>country (5)</b> 441:13;548:25; 549:24;606:16;619:12 <b>couple (4)</b> 438:4;507:15; 580:20;583:4
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<b>course (16)</b> 423:7;434:13;444:4; 489:7,9;503:6;560:21; 566:24;573:22;591:16; 621:5;635:4;640:12; 655:22;660:1;671:10 <b>COURT (543)</b> 408:2,13,16;409:15, 24;410:3,11,15;411:7, 21;413:8;414:3,7,19, 20,25;415:17,25;416:4, 12;417:12,22;418:7,12, 19,22;419:1,3,6,12,18, 25;420:10,14,20,24; 421:8,15,18,21;422:11, 15,17,24;423:10,16,20, 22;424:6,8,12,17,20, 25;425:3,12,16,25; 426:20,25;427:9,16,19, 21;428:1,12,16; 429:25;430:2,13,16; 432:19,22;433:1,5,9; 435:8,11,13;436:14; 437:9,11;438:17; 439:9;440:1,4,9,12; 442:1;443:5;445:19; 447:6,15,19;450:8; 452:2,6,10,13;455:8; 456:1,5,8;459:14; 460:10,13,18;461:2,8, 17,20;462:15,21;463:5, 12,23;464:3,17,22,25; 465:9,15,23;466:2; 467:1,9,14,19;468:11, 21;470:8,18;471:4,12, 17;472:2,12,21;473:8, 15;474:7,18;475:1; 477:19;478:1,4,6,20; 479:5;481:3,7,12,19, 24,25;482:2,5,7,15; 483:1,12,20,25;484:4, 16,23;485:5,22;486:2, 17;487:2,4,10,14,18; 488:1,3,8;489:5,13,21; 490:8,9,15;496:1,2,4,7, 17,21;498:19;499:1, 25;500:5,7;501:7,13, 17,19;502:2,5,7,15,24; 503:4,24;504:18,21,23, 25;505:5,11,14,16,19, 23;506:3,5;507:13,25; 508:2,13,21,23;509:2, 6,8,12,16;510:3; 511:18,22;512:2,6,23; 514:6,24;515:3,6,21, 23;520:5;522:5,21; 523:8,11,16,21,23; 525:20;528:7,10; 529:2,4,9,12;530:1,2; 532:21,25;537:8; 540:5;543:7,9;545:8, 12,16;546:22;547:8,20, 23;554:24;555:2;	556:3,16;558:4;559:9, 15;560:16,19,23;561:6, 14,16,22;562:2;563:3, 6,9,11,13,19,23;564:6, 12,16;565:11,18,23; 566:9,18,25;567:11,19, 24;568:5,10,14,22; 569:4,10;570:9;571:3, 12,18,24;572:10,14,24; 573:2,9,15,18,22,24; 574:19,24;575:6,10,25; 576:2,7,10,25;577:2,5, 6,8,12,18,21;578:1,8, 13,16,21;579:3,7,12; 580:14;583:16,21,22, 25;584:3,18;585:2,7, 22,24;586:1,2,5,8; 588:2;593:3,11; 595:20,23;596:2; 597:3;598:18,25; 599:2,6,8;600:1,6,19; 604:13,24;607:7,14,15, 19,25;609:6;610:14, 19;613:24;614:1,3,14; 615:18,21;617:15,17; 618:15,17;619:4,18,25; 620:2,5,9,21,24;621:2, 4,6,9,12;622:12; 623:12,16;624:5,20,24; 625:5,8,10,16,18; 626:4,8,11,17,25; 628:3,9,13,21,25; 629:5,9,13,15,20,25; 630:4;631:5,10,16,18; 632:2;633:4,6,18; 635:15,21,24;636:2,7, 14,21;637:6,9,18; 638:4,8;639:1,2; 641:20,22;642:1,4,17; 643:8,22;644:11; 645:11;646:9,12; 647:24;648:1,3,8,15, 19;649:5,11,20;650:1, 2,15;651:23,25;652:3, 6,11,13,18,24;656:1; 657:1,4,8,11,13; 659:12;660:19;661:1; 664:5,14,18,22,23,25; 665:3,5;666:6,8,20,22, 25;667:20,22;668:15, 18,21,23;669:4; 670:23;671:2,4,7,14, 18,22;673:2,6,8,15,19, 21,25;674:5,12,15,23; 675:7,11,19 <b>courtroom (3)</b> 565:4;583:13;627:23 <b>courtrooms (1)</b> 506:3 <b>courts (3)</b> 411:13;412:17;489:9 <b>Court's (7)</b> 426:1;622:13;630:2;	664:17;666:3,16; 667:17 <b>cover (2)</b> 414:18;601:20 <b>coverage (3)</b> 587:18;627:24;628:5 <b>crash (1)</b> 590:20 <b>cream (1)</b> 443:24 <b>created (4)</b> 654:22,23;659:24; 665:15 <b>creating (1)</b> 625:4 <b>creative (2)</b> 653:12,13 <b>credentials (1)</b> 433:19 <b>credibility (9)</b> 413:14;572:7; 636:15,21,22,23; 637:13,22;638:8 <b>crime (1)</b> 542:7 <b>criminal (16)</b> 483:24;484:1,18; 486:16;487:20,23; 488:19;545:2;554:21; 563:22;566:11,16,19; 570:1;575:19;576:5 <b>critical (1)</b> 413:12 <b>cross (15)</b> 417:11;420:9; 449:14;485:10;486:1; 490:1;506:9;577:4; 578:1,19;617:11; 623:17;635:21;636:15; 652:7 <b>crossed (1)</b> 636:7 <b>cross-exam (1)</b> 536:13 <b>cross-examination (32)</b> 411:15,23,24; 418:15;423:8;428:21; 429:7;481:18;496:22; 579:14;600:21;601:15; 602:9;604:5;606:8,19; 609:18;610:2;615:2, 13;617:2,13;618:9,22, 24;626:3;638:6;649:8; 668:24;675:2,10,17 <b>cry (1)</b> 591:13 <b>crying (2)</b> 552:23;650:14 <b>culmination (2)</b> 670:6,19 <b>cumulative (1)</b> 561:11 <b>current (3)</b>	410:22;623:2;634:14 <b>custodial (1)</b> 662:13 <b>custodian (2)</b> 412:10,12 <b>cut (1)</b> 447:15 <b>D</b> <b>dad (1)</b> 444:16 <b>dance (1)</b> 653:12 <b>Daniel (2)</b> 652:12,21 <b>dark (4)</b> 506:3;514:19; 521:15;522:14 <b>database (1)</b> 665:9 <b>date (32)</b> 410:23;418:14,18; 436:2;439:15,16; 446:8;461:1,3,24; 463:10;464:1,5,25; 465:19;472:22;480:7; 485:2;540:22;543:15; 544:6,8;549:19;555:8; 558:23;580:2;588:16; 596:5;598:2;614:12, 12;662:1 <b>dated (2)</b> 442:12;647:10 <b>dates (6)</b> 537:22;544:5; 549:14,21;550:7; 606:17 <b>dating (3)</b> 635:10;640:5;647:8 <b>day (8)</b> 446:15;481:24; 482:5;485:10;501:23; 577:7;616:5;670:11 <b>days (5)</b> 419:3;442:7;444:7,8; 448:21 <b>deal (6)</b> 411:18;415:2,7; 416:8;425:9;426:23 <b>deals (1)</b> 416:11 <b>dean (9)</b> 519:24;520:3,9,14, 17,20,23;521:6,6 <b>Dear (1)</b> 662:19 <b>decades (1)</b> 553:20 <b>decendent (1)</b> 598:10 <b>December (17)</b> 470:25;471:9,13,19;	472:23;473:11,19; 474:22;475:22;479:18; 497:16;498:8;504:12; 520:2,8;540:19;675:20 <b>decide (3)</b> 468:15;469:1;577:18 <b>decided (2)</b> 555:6;564:21 <b>decision (9)</b> 486:12;488:22,23; 489:8,13,16;554:21; 574:18;580:17 <b>deepest (1)</b> 602:24 <b>Defendant's (10)</b> 436:19;440:8; 599:10;600:4,10; 610:12,23;612:23; 613:4,22 <b>defense (42)</b> 408:17;409:11; 411:14,19,22;412:10, 13,15,19;413:5,5; 416:19,20,21;418:5; 421:22,22;422:13; 423:6;425:7,20;426:3, 4,6,21;427:18;438:16; 482:4,12;488:10,11,13; 559:22;561:2;565:13, 16;614:23;626:14,23; 666:17,17;667:18 <b>defense's (3)</b> 409:12;417:1;675:7 <b>defer (1)</b> 425:7 <b>delay (2)</b> 426:13;652:17 <b>delayed (1)</b> 486:12 <b>demand (2)</b> 555:22,24 <b>demanding (2)</b> 469:16;483:14 <b>demanding (7)</b> 483:18,22;484:1,17; 485:1;555:25;556:5 <b>demeanor (2)</b> 646:6,18 <b>denies (2)</b> 462:11,19 <b>deny (2)</b> 464:14;563:16 <b>denying (1)</b> 498:3 <b>department (2)</b> 654:1,24 <b>depend (2)</b> 427:9;592:7 <b>depending (1)</b> 408:21 <b>depends (3)</b> 422:22;565:11;675:1 <b>deposition (1)</b>
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415:4 <b>DEPUTY (1)</b> 505:13 <b>describe (3)</b> 605:14;617:8;643:16 <b>described (6)</b> 410:6;431:6;469:15; 470:21;517:7;522:7 <b>description (2)</b> 517:4;523:19 <b>desk (1)</b> 535:11 <b>desperately (1)</b> 608:25 <b>detail (3)</b> 413:17;601:21; 643:15 <b>detailed (2)</b> 609:16,17 <b>details (12)</b> 413:12;443:16; 514:13,19;602:12; 603:2,8;617:13; 646:21,23;647:1;651:9 <b>determination (1)</b> 460:24 <b>determinations (1)</b> 487:23 <b>devastated (1)</b> 552:20 <b>died (3)</b> 636:19;637:7,8 <b>Diet (1)</b> 579:1 <b>difference (6)</b> 464:23;465:2; 560:25;615:17,20; 623:4 <b>different (26)</b> 457:14;461:22; 472:13;474:21,22; 505:2;506:25;542:23; 587:16;590:11;601:23, 23,23,25,25,25;623:5; 635:6;661:24;663:17; 668:8,10,11,12;673:12, 12 <b>difficult (13)</b> 431:9,10;438:20; 479:13;602:19,22; 603:5,5,6;611:16,21; 622:18;637:17 <b>difficulties (4)</b> 554:7;611:12;612:3, 5 <b>diligence (2)</b> 428:18;671:11 <b>dime (1)</b> 536:20 <b>dining (1)</b> 654:4 <b>dinner (3)</b> 454:16;455:4,19	<b>direct (33)</b> 408:19;418:3; 434:11;435:13,14; 440:9;443:11;445:21; 456:14;459:3;477:22; 496:19;497:23;498:15; 499:7;513:16;514:2; 522:1;536:18;550:4; 574:12;585:9;601:5; 611:15;620:18;621:25; 626:1;629:25;630:6; 633:8;648:21;649:7; 653:1 <b>directed (3)</b> 424:5;460:14;542:6 <b>directing (4)</b> 463:25;501:7;611:9; 614:8 <b>directly (2)</b> 411:1;419:24 <b>director (4)</b> 434:3;510:22;654:3, 4 <b>disagree (5)</b> 409:5;411:12;428:6; 623:8;628:7 <b>disagreement (8)</b> 411:13;422:1,7; 423:4;425:5;462:21; 465:25;621:7 <b>disbursed (1)</b> 561:4 <b>disclose (7)</b> 412:17;413:7; 414:14;416:18;464:9, 10;567:22 <b>disclosed (3)</b> 408:20;412:15; 416:20 <b>disclosing (1)</b> 567:3 <b>discovered (1)</b> 662:21 <b>discovery (1)</b> 414:17 <b>discrepancy (1)</b> 410:19 <b>discuss (7)</b> 422:10;423:10,13, 15;559:16;602:15; 608:11 <b>discussed (19)</b> 420:16;430:21; 431:13;436:9;446:7; 456:17;477:6,8,11; 567:3,6;577:6;606:1, 18;628:3;636:2; 640:11;662:23;673:16 <b>discussing (1)</b> 606:14 <b>discussion (4)</b> 428:4;499:7;621:21; 622:11	<b>discussions (2)</b> 503:6;546:9 <b>dishonesty (1)</b> 408:24 <b>display (2)</b> 655:25;664:4 <b>disposing (1)</b> 464:7 <b>dispute (2)</b> 410:21;412:21 <b>disputing (1)</b> 576:14 <b>disregard (2)</b> 642:18;645:12 <b>distinction (2)</b> 623:8;624:5 <b>distinctly (1)</b> 524:7 <b>district (3)</b> 489:9;627:16,19 <b>document (72)</b> 411:16;412:9,11; 417:9;424:6;435:19, 20;436:17;445:22; 454:5;456:6;460:6; 462:2,4,13;465:20; 479:4;484:9;485:13, 17;498:2;543:17,19; 549:10,19;558:2,21,23, 25;559:19,20,25;560:3, 14;561:6;583:13,19, 21;584:7;585:3,21,22; 586:5;588:6,13; 597:18,20;598:24,25; 600:11,12;613:5; 614:12,12;615:2,6,9; 630:17,20;633:9; 661:3,18,19;662:9,10; 667:4,7,9,13,14,24; 668:6 <b>documentary (1)</b> 560:7 <b>documents (13)</b> 450:7;452:1;462:9; 481:23;482:5,8,18,23; 483:13;501:25;584:17; 607:15;659:7 <b>dog (3)</b> 443:13;446:16;447:9 <b>dollars (7)</b> 533:25;534:9,12,14; 540:17;541:1;655:6 <b>Donald (3)</b> 521:9,17;522:15 <b>donating (2)</b> 655:6;661:8 <b>donation (3)</b> 655:2;656:9;661:22 <b>donations (1)</b> 655:15 <b>done (2)</b> 438:3;572:18 <b>donor (7)</b>	654:24;655:1,3,5,18, 19;670:16 <b>donors (11)</b> 654:11,14,17,18,20, 22;655:11,13;670:13, 13,15 <b>door (1)</b> 561:10 <b>dorm (1)</b> 656:19 <b>doubt (2)</b> 416:7;489:17 <b>dovetail (1)</b> 621:24 <b>down (17)</b> 424:20;441:5; 443:20;499:19;509:16; 564:14;579:24;591:5; 597:15;612:25;613:6; 620:2;652:8;659:6; 664:19;671:5;674:21 <b>draft (1)</b> 576:23 <b>drama (1)</b> 591:11 <b>dramatic (2)</b> 590:10;591:9 <b>draw (1)</b> 629:10 <b>drawn (1)</b> 472:12 <b>Dreamcoat (1)</b> 438:10 <b>Drescher (9)</b> 655:25;660:25; 661:17;662:4,8; 663:11;664:4,16,19 <b>dress (3)</b> 552:18,21,23 <b>dresser (1)</b> 662:21 <b>drew (1)</b> 465:10 <b>driven (1)</b> 452:22 <b>driver (3)</b> 525:6;531:17;533:17 <b>driver's (2)</b> 630:24;631:24 <b>driving (1)</b> 531:18 <b>drop (1)</b> 505:25 <b>drug (1)</b> 591:5 <b>dry (1)</b> 663:2 <b>due (2)</b> 498:1;499:17 <b>duly (3)</b> 429:6;629:24;652:23 <b>duration (1)</b> 578:19	<b>during (43)</b> 419:10;423:7; 450:16,21;456:24; 464:7;475:24;480:4; 484:17;525:12;547:16; 548:22;553:8;559:7; 566:23;571:25;575:15; 578:24;581:2;587:24; 602:1,8;603:25; 604:18;612:5;617:23; 621:4;623:2;634:5,8, 21;635:4,10;640:6,12, 14;642:22;644:20; 647:10;650:11;651:18; 653:10;658:7 <hr/> <b>E</b> <hr/> <b>earlier (14)</b> 478:2;481:15; 576:20;579:20;580:17; 584:14;592:16;594:1, 2;606:18;621:22; 636:5,13;665:8 <b>early (1)</b> 675:5 <b>easier (1)</b> 603:23 <b>East (1)</b> 517:8 <b>eat (1)</b> 605:8 <b>eating (1)</b> 443:24 <b>education (5)</b> 653:9,11;660:10,12; 665:23 <b>Edwards (1)</b> 546:24 <b>effect (4)</b> 574:4;581:24; 607:21;630:3 <b>effectively (1)</b> 586:18 <b>efficient (1)</b> 425:9 <b>efficiently (1)</b> 428:9 <b>efforts (2)</b> 529:5;576:13 <b>Eight (4)</b> 616:9;657:2,5,11 <b>eight-figure (2)</b> 486:11,22 <b>eighth (2)</b> 517:21;614:22 <b>eight-story (3)</b> 517:7,18;533:10 <b>either (5)</b> 574:23;628:2; 637:19;665:22;669:14 <b>electronic (1)</b> 655:14
--	--	--	--	---

<b>elicit (1)</b> 624:21	<b>ensure (3)</b> 423:5;482:16;485:19	512:18;517:13;519:8; 19;531:3;22;533:10; 536:20;555:17,20; 579:22;582:12;607:16; 617:5;651:19;656:17; 669:19	<b>evidence (40)</b> 408:23;409:22; 411:24;412:3;415:9; 15,20,23;436:19; 440:8;450:7;460:24; 464:13,17;482:19; 528:6;558:3;561:2; 563:14;571:1;572:6; 584:17;585:21;599:10; 600:5;610:13;613:22; 620:15;624:14;631:12; 632:23;633:2;657:15; 659:15;660:22;664:15; 666:5,18;667:19;669:7	<b>exhibit (67)</b> 416:25;431:6;432:4; 434:12;436:19;437:19; 439:8,11,25;440:8; 442:15,16;463:25,25; 467:5;537:3,12;557:5; 558:20;559:6;563:7; 566:6;579:23;583:11; 585:25;586:1;588:1; 599:10;610:12,24; 612:23;613:4,22; 614:24;630:18;631:3, 9,12,14,19,22;632:7, 22,23;633:8;656:2,12, 13,15,16,25;657:15; 658:18;659:1,10,15; 660:4,17,22;661:1; 664:6,15,20;666:4,17; 667:13,18
<b>eloquent (1)</b> 590:7	<b>entertainment (1)</b> 589:9		<b>escaped (1)</b> 536:21	<b>exhibits (18)</b> 424:3;425:21; 426:18;427:5,6;430:9; 432:20;433:2;467:2; 482:6,13;583:4; 585:22;600:4,10; 629:3;633:2;660:24
<b>else (17)</b> 421:15;423:23; 424:13;425:18;467:11; 490:12;534:23;561:8, 16;564:3;577:2; 578:17;586:24;607:21; 626:11;644:20;645:8	<b>entire (5)</b> 597:20;601:21; 605:19;616:3;670:12	<b>equivalent (2)</b> 489:12;670:1	<b>Especially (3)</b> 504:4;623:4;670:13	<b>exact (12)</b> 428:25;446:8,18; 448:4;526:1;539:25; 543:15;555:8;561:4; 563:19;629:10;650:22
<b>email (6)</b> 508:14,17;511:19; 565:25;567:10;654:18	<b>entirely (5)</b> 417:17;572:9; 621:25;622:9;649:1	<b>escaped (1)</b> 536:21	<b>essentially (3)</b> 486:19;591:7;648:25	<b>exactitude (1)</b> 621:18
<b>embarrassed (2)</b> 608:22;646:19	<b>entities (1)</b> 557:14	<b>establish (2)</b> 512:3;621:20	<b>established (3)</b> 409:9;538:23;580:19	<b>exactly (6)</b> 417:4;461:6;503:7; 565:22;573:5;674:7
<b>Embarrassing (2)</b> 537:14;603:13	<b>envelope (3)</b> 662:12,14,19	<b>establishes (1)</b> 568:21	<b>establishing (1)</b> 561:2	<b>examination (11)</b> 443:11;456:14; 464:8;483:10;600:8; 601:5;620:18;621:25; 630:1,6;653:1
<b>Embarrassingly (1)</b> 552:8	<b>Epstein (160)</b> 410:5;420:18; 442:24;443:7;444:13, 15;445:2,12;446:1; 447:2,9;448:17;450:4, 11,16;451:5,9;454:6, 15;455:1,3;456:11; 458:15;459:3;460:14; 465:1,10,11;467:25; 468:3,15,25;469:3,16; 470:22;472:5;475:3,9, 16;476:9,12,15,18,21, 24;477:3,16;478:22; 479:7;480:11,18,21; 497:3;498:5;502:22; 503:10;505:8;506:14, 22;507:10;510:21; 511:10;516:12,17; 518:18;519:1,16,21; 520:9,18,21;521:1,9; 522:10,11;530:23; 531:12,18;533:22; 534:18,25;535:10,19; 537:9;538:4;539:3,8; 542:13;546:1,3,6,13, 20;547:4,10,18;548:2; 551:10;552:18,20; 556:10;557:3,11,12; 558:1;578:5;581:5,14, 25;592:8,14,19;593:20, 25;594:15;598:10; 601:22;604:11;605:10, 12,14;606:12,23; 608:12;616:19,22; 617:24;618:13,23; 640:19,21;641:16,18; 642:7,13,22,25;643:10, 17;644:8,13,25; 645:20;646:6,17,21; 647:14;648:14;649:12; 650:5;656:7,20;661:5, 22;662:13,20;663:20; 664:3,9;670:16	<b>Estate (7)</b> 454:18;555:17,20; 557:12;560:2;578:5; 581:5	<b>examine (1)</b> 464:15	
<b>Emmy (9)</b> 526:10,13;527:1; 530:7;532:8,11,12,18; 533:1	<b>envelopes (3)</b> 662:12,14,19	<b>Estates (1)</b> 440:23	<b>Europe (1)</b> 549:1	<b>examined (1)</b> 426:11
<b>emotionally (1)</b> 603:5	<b>enclosed (1)</b> 662:19	<b>estimate (4)</b> 579:2;674:24;675:6, 7	<b>Eva (2)</b> 525:22;530:11	<b>examining (1)</b> 464:8
<b>employed (2)</b> 632:15,18	<b>enclosing (1)</b> 662:12	<b>etc (1)</b> 438:7	<b>evaluate (2)</b> 577:13;622:14	<b>example (15)</b> 412:6,16,20,22; 461:22,25;465:10,14; 541:23;545:2;571:11; 622:1;655:4,7,16
<b>en (1)</b> 489:12	<b>encounters (3)</b> 475:25;480:4;525:13	<b>evening (1)</b> 428:19	<b>Even (6)</b> 419:3;489:10; 585:19;648:20;655:5; 661:14	<b>examples (1)</b> 412:7
<b>enclosed (1)</b> 662:19	<b>encounters (3)</b> 475:25;480:4;525:13	<b>event (2)</b> 410:17;490:10	<b>Evening (1)</b> 428:19	<b>ex-boyfriend (3)</b> 546:12;547:14;553:4
<b>enclosing (1)</b> 662:12	<b>encouragement (1)</b> 487:21	<b>events (1)</b> 413:11	<b>event (2)</b> 410:17;490:10	<b>exceeds (1)</b> 617:10
<b>encounters (3)</b> 475:25;480:4;525:13	<b>encouragement (1)</b> 487:21	<b>Everdell (27)</b> 408:11;410:1,2,8,14; 411:3,11;412:5;413:9; 414:6,8,22;415:13,19; 416:1,10,13;417:7,21, 23;419:19;420:8; 421:17;424:1;467:20; 496:9,11	<b>Europe (1)</b> 549:1	<b>exception (1)</b> 675:14
<b>emotionally (1)</b> 603:5	<b>end (6)</b> 455:10;459:16; 572:17;619:19;669:20; 670:1	<b>Everyone (8)</b> 436:17;468:16; 469:1;481:9;506:5,8; 559:15;629:16	<b>Eva (2)</b> 525:22;530:11	<b>exchange (1)</b> 608:13
<b>employed (2)</b> 632:15,18	<b>end-run (1)</b> 568:24		<b>evaluate (2)</b> 577:13;622:14	<b>exchanged (1)</b> 484:9
<b>en (1)</b> 489:12	<b>ends (1)</b> 572:16		<b>Even (6)</b> 419:3;489:10; 585:19;648:20;655:5; 661:14	<b>excited (1)</b> 504:1
<b>enclosed (1)</b> 662:19	<b>enforcement (1)</b> 538:11		<b>evening (1)</b> 428:19	<b>Excuse (2)</b> 500:16;521:6
<b>enclosing (1)</b> 662:12	<b>engaged (4)</b> 476:21,24;477:3; 536:13		<b>event (2)</b> 410:17;490:10	<b>excused (6)</b> 620:3,4;652:9,10; 671:5,6
<b>encounters (3)</b> 475:25;480:4;525:13	<b>Enjoy (1)</b> 559:12		<b>events (1)</b> 413:11	<b>ex-girlfriend (1)</b> 633:21
<b>encouragement (1)</b> 487:21	<b>enough (7)</b> 548:12,17;552:8; 560:11;571:13;574:19; 590:6		<b>Everdell (27)</b> 408:11;410:1,2,8,14; 411:3,11;412:5;413:9; 414:6,8,22;415:13,19; 416:1,10,13;417:7,21, 23;419:19;420:8; 421:17;424:1;467:20; 496:9,11	
<b>end (6)</b> 455:10;459:16; 572:17;619:19;669:20; 670:1	<b>enrolls (1)</b> 659:23		<b>Everybody (3)</b> 506:6;509:16;608:24	
<b>endeavors (1)</b> 586:18	<b>ensemble (1)</b> 611:17		<b>everyone (8)</b> 436:17;468:16; 469:1;481:9;506:5,8; 559:15;629:16	
<b>end-run (1)</b> 568:24				
<b>ends (1)</b> 572:16				
<b>enforcement (1)</b> 538:11				
<b>engaged (4)</b> 476:21,24;477:3; 536:13				
<b>Enjoy (1)</b> 559:12				
<b>enough (7)</b> 548:12,17;552:8; 560:11;571:13;574:19; 590:6				
<b>enrolls (1)</b> 659:23				
<b>ensemble (1)</b> 611:17				

482:12;483:4;559:22; 572:5;674:17,19 <b>external (1)</b> 654:6 <b>extra (1)</b> 438:24 <b>extrinsic (9)</b> 408:23;409:18,21; 415:9,15,20,23;464:13, 17 <b>extrinsically (1)</b> 571:1	639:7,15;641:14;663:7 <b>famous (1)</b> 522:11 <b>far (5)</b> 490:11;632:8;644:2; 665:23;669:12 <b>father (5)</b> 636:19;637:7,8; 639:10,16 <b>father's (1)</b> 437:20 <b>favorable (1)</b> 612:12 <b>favoring (1)</b> 487:20 <b>favorite (1)</b> 591:2 <b>FBI (7)</b> 410:11;415:4; 447:17;463:1;502:9; 601:20;641:1 <b>Feastival (1)</b> 434:22 <b>feature-length (1)</b> 591:24 <b>February (20)</b> 455:6,22;459:10; 473:21,24;474:23; 475:7;477:22;478:18, 25;499:8,15;504:14; 507:18;508:5,9,14; 513:11,21;662:2 <b>Federal (1)</b> 620:15 <b>FedEx (3)</b> 412:9,9,11 <b>fee (3)</b> 442:16;543:20; 661:16 <b>feedback (1)</b> 477:13 <b>feel (13)</b> 427:22;467:15; 582:11;603:12,13,21; 622:22,24;645:3,17,24, 25;651:20 <b>feeling (1)</b> 603:23 <b>feet (1)</b> 489:7 <b>felt (6)</b> 434:22;456:14; 486:20;505:23;581:24; 623:10 <b>females (1)</b> 624:20 <b>few (22)</b> 424:23;444:7,8; 448:21;451:4,8; 481:23;482:5;507:6; 527:24;536:2;540:23; 553:20,22;564:14; 603:24;604:1;610:6;	611:5;612:25;616:6; 669:1 <b>fewer (3)</b> 603:15,18,22 <b>fibbing (1)</b> 614:20 <b>fictional (1)</b> 586:14 <b>figure (5)</b> 561:4,12;640:15,15, 16 <b>file (10)</b> 555:6;566:3;655:12; 656:17,20;657:20,22, 23;658:10;659:6 <b>filed (7)</b> 448:12;555:9; 557:11;584:8;593:3; 597:23;628:18 <b>files (4)</b> 655:17;657:25; 658:3,4 <b>filing (2)</b> 583:1;656:18 <b>fill (1)</b> 556:17 <b>filled (1)</b> 556:13 <b>filter (2)</b> 660:12;665:17 <b>filters (2)</b> 665:13,15 <b>final (5)</b> 429:24;430:2; 662:23;669:22;670:11 <b>finally (2)</b> 555:6;616:1 <b>finance (3)</b> 653:23,25;654:1 <b>finances (1)</b> 554:9 <b>financial (15)</b> 419:9;429:14;437:6, 16;441:6,8;554:3,7; 574:13;605:9;619:21; 636:8;639:7,15;642:7 <b>financially (3)</b> 604:18;605:12,15 <b>find (6)</b> 499:6;505:17; 545:14;609:23;616:1,5 <b>finding (2)</b> 613:2;643:3 <b>fine (8)</b> 424:8,12;433:5; 505:23;545:17;570:20; 623:19;625:17 <b>finished (1)</b> 670:25 <b>firm (2)</b> 482:11;485:1 <b>first (110)</b> 412:2;418:22;	423:17;443:6;446:6, 13;450:10;451:4,8; 452:6;453:23;454:5; 461:22;462:16;468:8; 469:9,12,18,20,21,25; 470:4;471:1,5,10,14; 472:17,24;473:10,25; 474:3,9,12;478:14; 480:15;481:15;483:19, 24;497:2,13,17;498:3, 8,9,12;499:9,15,22; 500:3;503:8,12;504:2, 7,10;505:7;507:20; 508:10;511:13;512:7, 11,17;513:2,6,8,14,19, 22;515:12;520:15; 527:25;541:4;544:4,8, 15;545:4;569:4; 570:20;571:12;585:9, 12;588:11;589:17; 592:13,18;594:17; 596:19;602:17,20; 603:1;604:10;605:25; 612:23;613:3,4;617:5; 618:1,5,5,7,10,10; 619:10;633:22,23; 640:4,22;647:25; 648:16;660:11;666:12 <b>firsts (1)</b> 618:12 <b>five (4)</b> 478:13;496:2;613:6; 668:21 <b>five-four (2)</b> 614:10,18 <b>Five-two (1)</b> 613:14 <b>fix (1)</b> 619:16 <b>fixed (1)</b> 467:8 <b>flag (4)</b> 425:10,22;430:8; 537:5 <b>flagged (1)</b> 481:22 <b>flagging (1)</b> 490:8 <b>flew (6)</b> 503:9,12;506:22,24; 507:10;511:10 <b>flight (5)</b> 530:21,24;531:1,3,8 <b>flights (7)</b> 525:15;530:18; 531:6,9;536:23;537:1; 549:25 <b>flipping (2)</b> 426:9,15 <b>floor (1)</b> 517:21 <b>Florida (12)</b> 438:13;442:7;454:6;	455:12;458:20;497:5; 516:20;525:4;531:25; 532:6,13;533:2 <b>flown (2)</b> 505:8;511:14 <b>flying (2)</b> 506:13;531:11 <b>focus (1)</b> 612:24 <b>focused (2)</b> 653:8,11 <b>Focusing (3)</b> 633:8;644:4;650:16 <b>folder (2)</b> 630:16;632:24 <b>folders (2)</b> 655:17;657:25 <b>folks (2)</b> 624:22;655:9 <b>follow (3)</b> 469:16;489:9;568:16 <b>followed (2)</b> 419:10;553:12 <b>following (4)</b> 463:1;471:20;484:8; 487:8 <b>follows (3)</b> 429:6;629:24;652:23 <b>followup (1)</b> 602:13 <b>follow-up (1)</b> 569:11 <b>fondling (1)</b> 470:22 <b>food (1)</b> 605:4 <b>foot (1)</b> 578:22 <b>forever (2)</b> 617:1;655:21 <b>forgot (2)</b> 590:21;598:3 <b>form (23)</b> 435:10;470:7,17; 471:3,11,16;472:1,11, 18;473:2,14;503:23; 507:11;546:8,21; 547:22;556:14,17,19, 21,23;557:1,4 <b>format (1)</b> 675:18 <b>formed (1)</b> 578:13 <b>formerly (3)</b> 434:2;664:2,8 <b>forth (2)</b> 548:25;605:20 <b>forward (4)</b> 578:23;629:21; 652:13,14 <b>found (6)</b> 430:19;507:15; 535:13;645:18;662:12,
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20 <b>foundation (8)</b> 473:4;489:21; 508:19;556:2;586:4; 635:18;641:24;655:1 <b>foundational (1)</b> 472:19 <b>Four (1)</b> 553:15 <b>Fourteen (1)</b> 497:11 <b>fourth (8)</b> 445:25;452:8; 453:21,23;455:9; 499:13;508:3;526:22 <b>frame (2)</b> 472:3;552:16 <b>framed (3)</b> 482:17;484:6;485:15 <b>frankly (1)</b> 559:25 <b>free (7)</b> 467:15;643:15; 647:4;648:6;650:13; 651:2,3 <b>frequency (2)</b> 523:14,20 <b>frequently (1)</b> 548:22 <b>Friday (2)</b> 674:4,12 <b>friend (6)</b> 543:13,13;544:25; 604:15;609:25;640:10 <b>friends (10)</b> 443:12;448:10; 519:19;522:11;545:1; 548:16;553:10;585:18; 609:24;634:15 <b>front (8)</b> 481:24;586:24; 600:12;603:12;610:21; 625:3;630:16;632:21 <b>frustration (1)</b> 649:1 <b>fucking (1)</b> 647:3 <b>full (22)</b> 434:12;455:9;456:6; 474:3;479:14,20; 480:15;499:13;500:17; 501:7,9;504:23; 512:15;513:17;520:13; 522:6;532:15;541:8; 593:13;602:23;632:15, 18 <b>fully (1)</b> 409:1 <b>fun (7)</b> 477:16;498:13; 499:9;500:3;507:20; 508:11;618:4 <b>functional (1)</b>	412:2 <b>fund (9)</b> 482:9;566:20,23; 576:21,22;578:7,14; 581:10;618:23 <b>fundraising (2)</b> 655:15;660:9 <b>funds (2)</b> 441:12;561:11 <b>furniture (1)</b> 663:7 <b>further (5)</b> 573:13;599:11; 619:24;652:2;668:14 <b>G</b> <b>gander (1)</b> 637:14 <b>gas (1)</b> 578:22 <b>gated (2)</b> 421:5;440:23 <b>gave (23)</b> 432:24;433:17; 438:1;444:3;445:8; 465:7;473:12,18; 474:21;477:13;517:4; 533:22;534:13,14,18, 22;540:25;542:16; 552:20,23;605:16,20; 642:25 <b>general (10)</b> 417:6;426:25; 564:25;604:3;622:19; 635:3;640:20;646:5; 661:15;674:16 <b>generally (1)</b> 565:17 <b>generate (1)</b> 665:17 <b>generated (3)</b> 660:10,13;665:8 <b>gentlemen (1)</b> 428:16 <b>gets (3)</b> 567:4;569:19;671:7 <b>Ghislaine (75)</b> 443:1;444:18; 445:15;446:3,13,16; 447:9,22,25;448:1,7, 25;449:21;450:2; 453:15;454:10,23; 456:14;458:15;467:25; 469:10,18,22,25;470:5, 10,22;471:2,6,10,15, 20,25;472:5,10,17,24; 473:11,25;475:3,9,19; 476:5,8,11,14,17,20, 23;477:2,6;478:9,22; 479:7,10;480:4,10,17, 20;500:13;501:4; 503:9;517:23;535:3;	551:6;555:15,22; 556:4,8;616:18,21; 618:1;651:5,10;662:19 <b>giant (1)</b> 518:8 <b>gift (1)</b> 655:7 <b>gifts (3)</b> 534:18,18;605:20 <b>girl (1)</b> 623:9 <b>girls (21)</b> 459:1;474:1,13,23; 519:2,15;525:12; 622:2,23;623:4,15,17, 19;624:1,15,17;625:2, 13,20;642:15;645:9 <b>given (7)</b> 408:5;464:14,15; 485:17;552:18;597:7; 655:3 <b>gives (3)</b> 442:16;450:16; 673:19 <b>giving (1)</b> 476:9 <b>glasses (1)</b> 504:20 <b>Glassman (26)</b> 508:15,17,24; 511:19,24;542:25; 543:2,4,21,24;544:1, 12,15;545:4;554:20; 555:13;566:4,22; 571:21,23;580:25; 581:1;609:19;673:23, 24,25 <b>Glassman's (1)</b> 543:10 <b>Glowing (2)</b> 433:14;434:8 <b>godfather (6)</b> 640:9,14,16,23; 641:6,12 <b>goes (5)</b> 413:14;417:2; 419:24;487:12;565:20 <b>Good (17)</b> 428:16,19;429:9,10; 453:6;487:25;509:12; 514:13;545:10;578:16; 612:19;630:8,9; 637:13,13;653:3,4 <b>goods (1)</b> 663:2 <b>goose (1)</b> 637:13 <b>government (266)</b> 412:8,13,16;414:18; 415:15;417:1,4,24; 421:16,23;423:25; 424:1;425:20;426:4,7; 429:5;432:20;433:2;	436:10;440:7;446:6, 15;447:2,8,21;449:23; 450:3,13;451:20,23; 452:19;453:11,19,25; 455:6,11;456:10; 459:10;461:1,3,18; 462:5;468:2,23,25; 470:25;471:8,13,19; 472:8,13,16,23;473:21, 24;474:12,16;475:7,22, 23;476:2,5,8,11,14,17, 20,23;477:2,6,22; 478:9,18;479:9,18; 480:3,6,10,12,24; 482:4;488:16;496:5; 497:16;498:8,12; 499:2,8,15,22;500:2, 11;501:14,20;502:18, 20;503:6,9;505:7; 506:13,21;507:9,19; 508:4,9;509:4,10,21, 21;510:9,13,25;511:2, 5,9,15,20,24;512:7,11, 17,25;513:11,18,21; 514:10,12,18;515:8,16, 24;516:2;517:4; 518:17,20;519:4; 520:2,8,16;522:10; 524:10;525:22;527:18; 529:5,7;530:5;531:5; 532:12;536:2,14; 537:12;540:19;541:11; 542:7;544:3,8,13,15; 545:5;555:1;560:19; 563:16;564:11,21; 565:15,19;566:2; 567:23;568:9,11,15,18, 23;569:2,13,18,20,22, 24;570:16,17;571:9,24, 25;572:20;573:4,6; 574:9,18;575:16,19; 576:11;578:3;580:19; 581:2,4,8;583:16; 588:1;592:13;593:5, 10,15;594:17,20; 596:23;600:22;601:4, 16,19,20,22;602:18,20; 603:2,8,14,18,22,25; 614:23;620:11,16; 621:13,19;624:13; 627:1;628:19;629:17, 18,23;630:18;631:2,2, 9,22;632:22,23;633:1, 8;636:6,11;652:11,12, 22;656:2,12,24,24; 657:6;658:18;659:9,9; 660:4,16,16;661:1; 664:6,12,20;666:4; 667:13;669:7,9; 671:16;674:8 <b>government's (14)</b> 411:20;412:20; 413:6;416:19;418:7;	488:5;565:8;570:4; 623:21;631:12;657:15; 659:15;660:22;664:15 <b>grab (1)</b> 610:10 <b>grade (4)</b> 613:17,18;614:21,22 <b>graduated (1)</b> 589:14 <b>grant (1)</b> 441:12 <b>granted (1)</b> 529:4 <b>granular (1)</b> 623:3 <b>grateful (2)</b> 467:14;663:8 <b>Great (5)</b> 420:14;506:3;621:6; 671:12;674:15 <b>greatly (2)</b> 424:22;428:18 <b>green (7)</b> 430:8;521:15; 522:14;537:5;663:25; 664:1,8 <b>grew (2)</b> 636:16;637:9 <b>grounds (13)</b> 427:11;528:7,7; 529:2;543:7;547:21; 559:17;561:21;570:22; 571:25;586:4;646:9; 647:24 <b>group (13)</b> 475:17;506:7; 514:21;522:24;523:25; 524:4,13;525:18; 526:5,19;527:8; 530:16;622:5 <b>growing (3)</b> 634:25;636:8;639:7 <b>grown (1)</b> 614:19 <b>guess (24)</b> 418:22;431:11; 438:22;454:7,9,9; 455:14;485:4,18; 507:7;524:3;542:12; 545:3;548:24,24; 550:21;565:11;590:7; 592:17;603:11;611:22; 619:11;629:9;673:13 <b>guests (3)</b> 518:14;661:14;663:1 <b>guidance (4)</b> 582:2,7;585:15; 648:12 <b>guy (2)</b> 641:12,13 <b>guys (2)</b> 458:16;604:4 <b>GX-12 (2)</b>
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631:5;633:6 <b>GX-17 (3)</b> 631:10,19,19 <b>GX-741 (1)</b> 657:13 <b>GX-743 (1)</b> 659:12 <b>GX-744 (2)</b> 660:19;665:6 <b>GX-745 (1)</b> 664:14	<b>head (1)</b> 554:12 <b>header (1)</b> 613:4 <b>headshots (2)</b> 497:21;498:5 <b>healing (1)</b> 616:5 <b>health (1)</b> 590:22 <b>hear (10)</b> 419:4;453:22; 481:25;490:3;498:20, 24;562:3;607:25; 626:17;635:22 <b>heard (10)</b> 410:19;426:14; 447:15;487:2;515:2; 565:7,10;623:24; 635:23;649:6 <b>hearing (3)</b> 520:5;647:25;648:16 <b>hearsay (8)</b> 485:20;543:8;607:4, 13,18;635:16;649:16, 17 <b>heavier (1)</b> 664:21 <b>height (1)</b> 613:9 <b>help (19)</b> 541:18;546:11; 554:9;555:13;564:20, 22;567:1,8,13;570:11, 18;571:5;572:21; 575:2,3;605:12;616:4; 642:7;674:2 <b>helped (2)</b> 605:15;640:10 <b>helpful (2)</b> 412:6;578:18 <b>helping (2)</b> 641:7,13 <b>here's (2)</b> 461:8;464:5 <b>hiding (1)</b> 612:19 <b>high (17)</b> 440:17;456:24; 457:9,16,18;458:5; 582:10;585:17;587:20; 589:4,5,5;604:6,19; 606:9;632:10;653:10 <b>higher (2)</b> 487:24;566:15 <b>higher-end (1)</b> 655:5 <b>hiking (2)</b> 512:20;513:23 <b>himself (1)</b> 663:1 <b>hire (5)</b> 539:21;542:9;544:1,	23;548:12 <b>hired (10)</b> 540:9,13;542:23,25; 543:14,24;544:12,25; 554:20;591:21 <b>hiring (1)</b> 582:24 <b>Historically (1)</b> 655:16 <b>hold (2)</b> 565:9;571:22 <b>holiday (1)</b> 663:9 <b>holidays (1)</b> 549:3 <b>home (29)</b> 421:4,5;448:17; 454:11;497:8,10; 517:12;518:4,24; 531:25;532:13;553:6; 604:16;606:18;612:3, 5,16,20;627:5;634:25; 635:4,6,11;636:4,19; 637:2,22;661:11;664:2 <b>homeless (2)</b> 410:6;419:23 <b>homes (2)</b> 516:11;518:13 <b>homework (1)</b> 589:10 <b>Honor (308)</b> 408:15;409:8,23; 410:2;411:3,11,17; 412:5;416:11,14,15; 417:6,7,24;418:13,21, 24;419:2,19;420:12; 421:17,20;422:13,16, 23;423:1,18,24;424:7, 9,11,14,19;425:2,19; 426:24;427:2,12,22; 428:11;429:3;430:10, 15;432:21;433:4; 436:8,11;437:10; 438:15,19;439:24; 440:11;441:25;443:4; 447:4,7,14,18;450:6; 452:5,11;455:24; 456:4;459:12;460:2, 15,20;461:7,21; 462:18;463:21;465:18; 467:7,13,22;468:19; 473:6;474:5,17; 477:18,25;478:19; 479:2;481:1,10,13; 482:14;483:3,13; 484:3,5;485:8,11; 486:6,7,18,23;487:3, 11,12,17;488:1,6,24; 489:20;490:5,13,16; 496:5,6,11,25;498:25; 499:24;500:4,20; 501:9,16,24;502:13,23; 503:3;504:20,22,24;	505:1;506:10;507:8, 11,23;508:19;509:3,5, 7,11,15,25;511:17; 512:1,3,5;514:23; 522:4;523:12,15,18,22; 528:6,9;529:3,8,10; 532:24;537:6;540:3; 545:7,10;546:10; 549:15;554:25;558:2; 559:4,7,18;560:6,18, 21,25;561:9,15,20; 563:4,10,15,20;564:13, 17;565:13,22;566:3, 14;567:2,14,23;568:4, 7,16,24;569:9,19; 570:24;571:17,20; 572:2,5,13,25;573:14, 17,25;575:23;576:17, 23;577:3,19,25;578:12, 15,18,25;579:2,17; 580:13;583:12,18; 584:2,4,16,23;585:20; 586:1,3,10;588:3; 597:2;598:19,20,23; 599:1,4;600:3,7,18; 604:12,23;607:4,6,13, 18,23;609:4;610:11,15, 18;613:25;614:2,11; 617:10,12,16;618:14, 16;619:3,17,24; 620:11;621:3,13; 622:13;623:6;624:12; 625:8;626:5,9,12,20; 627:3,11,14,22;628:8, 12,17,20;629:2,8,12, 18;630:2;631:2,8,11, 17;633:7,16;635:18; 639:4;641:23;642:3; 645:14;646:11;649:17; 651:24;652:2,16,25; 657:3,12;664:24; 666:24;668:14;671:17, 19,23;673:5;674:4,10; 675:1 <b>hope (4)</b> 425:16;428:18; 435:16;579:13 <b>hopeful (1)</b> 422:6 <b>Hopefully (4)</b> 590:10;616:1,5; 619:19 <b>hoping (4)</b> 460:3;559:10;616:4; 639:12 <b>horrified (1)</b> 646:19 <b>hotel (1)</b> 661:16 <b>hour (1)</b> 578:23 <b>house (70)</b> 410:6;413:14;	414:11;418:23;419:9, 11,17,23;449:3,5,9,10, 12,16;450:2;451:2,17; 452:17,20,23;453:12, 15,16;454:6,8,15,20; 455:4,5,12,18,19; 456:11;458:19;461:25; 469:13;472:5;497:5; 516:15,17,20;518:10; 521:19;522:8,17; 532:9,18;533:3,7,8,15; 554:14,19;604:15; 605:22,25;606:1,3,4,5; 612:16;622:21,23,24; 636:18;645:1,3,6; 647:19;651:19 <b>household (1)</b> 581:19 <b>houses (2)</b> 412:25;413:3 <b>huge (1)</b> 518:10 <b>hundred (2)</b> 453:4;461:5 <b>Hundreds (4)</b> 533:25;534:9,11,14 <b>hung (1)</b> 527:1 <b>husband (1)</b> 548:15 <b>husband's (2)</b> 544:25;609:25 <b>hypothetical (1)</b> 412:22 <b>hypothetically (1)</b> 413:2
<b>H</b>				
<b>hair (4)</b> 524:17;582:19,22; 583:9 <b>half (3)</b> 578:22;593:16;655:6 <b>hand (4)</b> 467:16;476:15; 559:10;617:18 <b>handed (2)</b> 565:25;605:16 <b>handle (3)</b> 408:12;655:5,8 <b>hands (1)</b> 673:7 <b>handwriting (1)</b> 615:9 <b>handwritten (3)</b> 421:2,9;450:4 <b>hanging (1)</b> 469:15 <b>happen (5)</b> 454:25;461:23; 523:4;524:1;616:5 <b>happened (26)</b> 446:12;469:12; 475:12,14;478:10,25; 498:10;502:14;503:1, 15,18;534:4;538:25; 545:21;581:13,13; 582:17;603:2,8; 606:23;619:10;642:21; 644:3;646:6,21;647:18 <b>happening (4)</b> 462:14;469:7; 505:17;513:8 <b>happens (4)</b> 411:22;412:12; 463:14;467:15 <b>happy (14)</b> 414:18;422:17; 423:13;481:16,24; 488:6;505:23;594:24; 595:1;607:6;624:19; 646:15;648:9;673:14 <b>harassing (3)</b> 541:19;548:14,15 <b>hard (6)</b> 417:3;520:5;570:15; 604:21;613:2;655:16	<b>I</b>			
<b>ice (1)</b> 443:24 <b>idea (5)</b> 531:10;583:10; 584:10;585:19;611:24 <b>identification (8)</b> 435:9;583:5,7; 630:18;656:2;658:18; 660:4;664:6 <b>identified (3)</b> 577:10;629:19,20 <b>identify (2)</b> 439:7;598:9 <b>identifying (12)</b> 408:5;421:19;422:5, 19;423:15;424:6; 436:12,18;559:5; 611:7;628:14;668:4 <b>identity (4)</b> 608:2,8;629:7;631:6 <b>idly (1)</b> 428:10 <b>ignored (2)</b> 512:8,18				

<b>imagine (3)</b> 414:20;670:21;674:8 <b>impact (3)</b> 568:1,2;569:6 <b>impacting (1)</b> 566:11 <b>impeach (9)</b> 415:20,21,23;416:5; 417:19;462:19;559:22; 565:14;568:17 <b>impeaching (13)</b> 411:1,7,9,9;415:1,10, 13,15;417:15,16; 418:3;419:24;572:6 <b>impeachment (33)</b> 408:18,19,22,23,25; 409:3,10,21;411:23; 412:4;413:22;414:2, 15,23;415:10;416:16, 17,22,22,23,25;418:5; 420:7;462:8,9;463:4; 489:1,2;560:4;565:2; 568:19,21;675:15 <b>implicates (2)</b> 565:16;566:7 <b>implication (6)</b> 572:11;624:10,10; 625:21,21,23 <b>important (5)</b> 497:14;561:1; 608:18,20,21 <b>impressed (3)</b> 512:22;513:1,6 <b>impressive (1)</b> 518:10 <b>improper (2)</b> 572:9;620:18 <b>improve (1)</b> 605:9 <b>improvisation (1)</b> 431:15 <b>inability (1)</b> 581:12 <b>inappropriate (3)</b> 498:10;503:1,17 <b>inaudible (1)</b> 447:12 <b>inches (1)</b> 614:19 <b>incident (14)</b> 443:16;469:12; 472:5,10;500:13; 501:14,21;502:6; 516:6;521:19;522:8, 18;582:2,17 <b>incidents (3)</b> 500:18;501:4;617:24 <b>inclination (1)</b> 570:21 <b>include (2)</b> 427:8;658:4 <b>included (3)</b> 414:18;533:13;	656:17 <b>includes (3)</b> 408:3;655:18;657:25 <b>including (10)</b> 451:24;545:23; 576:12;578:4;581:3,4, 8;598:12;627:24;654:1 <b>income (2)</b> 538:16,24 <b>inconsistency (6)</b> 460:19;463:7; 464:20,21;465:6; 637:12 <b>inconsistent (19)</b> 410:16,20;415:2,3; 421:14;450:8;462:3, 20,22;463:6;464:18, 19;465:2,4,16,24; 507:24;568:20;621:19 <b>incorrect (8)</b> 498:2,7;499:20; 503:14;506:15,17; 541:2;595:18 <b>increased (1)</b> 487:6 <b>indicated (1)</b> 550:8 <b>individual (6)</b> 434:17;441:14; 654:23;659:13;660:20; 669:14 <b>individuals (5)</b> 431:22;530:19; 531:9;557:14;558:1 <b>infer (1)</b> 624:14 <b>inform (1)</b> 674:17 <b>information (22)</b> 408:5;417:10; 421:19;422:19;424:7; 436:12,18;441:6; 511:23;547:17;548:2; 559:6;612:25;613:5; 614:6;628:14;656:7; 657:25;658:2;661:6; 666:11;668:5 <b>infrequently (1)</b> 571:24 <b>initial (6)</b> 445:2,9;450:22; 558:13;566:22;574:18 <b>injury (2)</b> 543:2;544:20 <b>in-person (1)</b> 609:13 <b>input (1)</b> 659:20 <b>inquired (1)</b> 447:13 <b>insofar (1)</b> 624:2 <b>instance (1)</b>	415:1 <b>instances (2)</b> 461:11;480:17 <b>instead (3)</b> 460:5;462:4;486:22 <b>instructions (2)</b> 617:23;671:9 <b>insufficient (1)</b> 487:22 <b>intend (1)</b> 624:13 <b>intended (1)</b> 511:24 <b>intending (1)</b> 626:22 <b>intends (2)</b> 482:12;559:22 <b>intent (1)</b> 569:25 <b>intention (3)</b> 489:10;568:19; 624:21 <b>interactions (5)</b> 645:19;646:17,23, 24;647:2 <b>intercourse (1)</b> 476:21 <b>interest (1)</b> 434:19 <b>interested (2)</b> 542:20;566:25 <b>Interlochen (42)</b> 419:21;429:11,14, 17;434:9;435:25; 441:14;442:17;496:13; 519:24;520:3,9,17,20; 584:13;605:17,19; 610:3,24;611:2,11; 612:8,15;613:20; 653:6,7,8,14,15,16; 654:8,13;655:11,22; 656:21;657:20;658:12; 659:16;661:14;663:19; 665:21;669:25 <b>Interlochen's (11)</b> 656:6,8;657:17; 658:15;661:4,7,21; 662:11,13;665:9; 669:21 <b>internationally (2)</b> 587:12;606:8 <b>internet (5)</b> 426:8;427:3,10,11; 540:2 <b>interpersonal (2)</b> 590:5,9 <b>interpretation (1)</b> 488:15 <b>interrogatories (2)</b> 597:8;598:6 <b>interrogatory (2)</b> 598:8,19 <b>intervening (1)</b>	488:14 <b>interview (7)</b> 445:8;454:4;455:22; 464:1;515:9,14;541:20 <b>interviewed (1)</b> 564:21 <b>intimidation (1)</b> 598:14 <b>into (29)</b> 436:13;460:9; 462:14;465:20;482:24; 483:7;484:11;485:20; 488:7;490:6;526:5; 541:19;548:2;561:22; 569:19;576:21;577:24; 585:21;606:4;609:22; 611:7;623:20;643:15; 644:2,3;649:7;651:9; 658:10;665:12 <b>introduce (12)</b> 411:14,19;412:9,10, 13;413:4;414:10; 488:10,13,16;519:21; 577:13 <b>introduced (6)</b> 413:1,6;519:24; 520:3,9;521:9 <b>introducing (1)</b> 461:13 <b>introduction (1)</b> 621:16 <b>inventory (1)</b> 663:3 <b>investigating (2)</b> 539:7,11 <b>investigation (1)</b> 484:18 <b>investigative (1)</b> 529:6 <b>investment (1)</b> 654:5 <b>invitation (2)</b> 669:19;670:18 <b>invite (1)</b> 449:3 <b>Invited (3)</b> 449:5;451:17;452:20 <b>involved (14)</b> 431:12;473:25; 476:18;484:7;526:17; 527:5;542:21;551:6; 590:11;598:16;637:16; 654:3,4;658:5 <b>involves (1)</b> 591:11 <b>irate (1)</b> 648:12 <b>Island (3)</b> 412:24,25;413:2 <b>Islands (1)</b> 555:19 <b>issue (76)</b> 408:3,10;409:9;	411:5,8,10,18;415:12, 14;416:7,8,10,12; 417:8,16,25;420:6; 425:5,10;459:13; 460:4,22;468:19; 481:15,16,22,22,24; 482:1,3,13;483:1,2,4,7; 487:14;488:23,25; 489:2,3,6,7,21;490:6; 505:20;529:5;545:12; 559:7;564:18;565:5; 566:17;570:5;571:23; 572:4;574:17;585:19; 620:13;621:23;622:16; 625:4;626:18;627:10; 628:4;636:12,12,15,20, 22;637:11,12;671:20, 21,22;673:13,16,21 <b>issues (24)</b> 415:9;421:18;422:5, 6,9;424:22;425:4,22; 427:19;481:14;561:10; 564:24;566:8;570:14, 25;577:6,11;590:22; 623:3;638:5;673:12, 17;674:17,20 <b>Italy (2)</b> 442:10;550:18 <b>items (3)</b> 662:15;663:4,16
<b>J</b>				
<b>J-10 (1)</b> 583:11				
<b>J-13 (1)</b> 445:18				
<b>J-14 (1)</b> 543:16				
<b>J-15 (6)</b> 597:19;599:9,10; 600:10;628:16,25				
<b>J-18 (1)</b> 557:5				
<b>J-3 (11)</b> 430:7,10,12,17,19; 433:8;610:12,20,24; 612:24;613:4				
<b>J-33 (1)</b> 595:16				
<b>J-37 (2)</b> 537:3;579:23				
<b>J-4 (12)</b> 435:9,21;436:9,14, 19;437:7,11;613:22; 614:3;666:17,23,25				
<b>J-40 (3)</b> 558:20;559:6,15				
<b>J-5 (12)</b> 439:7,11;440:3,4,4,8, 10,13,15;441:5;667:18, 22				
<b>J-6 (4)</b>				

439:23;440:1;549:9, 16 <b>J-7 (3)</b> 583:5,7;585:8 <b>J-8 (8)</b> 583:20,25;585:22, 24;600:1,2,4;628:11 <b>J-9 (8)</b> 583:5,11,20;584:1; 585:22,24;600:2,4 <b>James (1)</b> 412:24 <b>Jane (86)</b> 413:10;428:22,23; 429:4,9;435:10;481:8; 496:22,23;555:11; 572:22;574:12;579:14, 15,18;592:19;600:21; 610:21;619:5;620:2; 621:21;622:18,21; 624:7;626:16;627:4, 13,15,19;633:14,20,20, 22;634:3,6,12,14,16, 19,20,21,24;635:10; 639:6,15,24;640:6,11, 14,20;641:16,18;642:6, 12,21;643:10;644:7,12, 19,22,25;645:15,16,19; 646:2,5,17;647:11,13; 648:4,5,10,21,24; 649:18;650:4,11,16,17, 23,24;651:1,13,18; 674:1;675:4 <b>Jane's (5)</b> 482:9,10,17;635:4; 647:7 <b>January (4)</b> 448:12;551:17,21; 555:7 <b>Jeffrey (45)</b> 442:24;447:9,22,24; 448:3,5;451:9;471:20, 24;478:9;579:21; 605:12,14;606:23; 608:12;616:19,22; 617:5,24;640:19,21; 641:16,18;642:7,13,21, 25;643:10,17;644:8,13, 25;645:18,20;646:6,17, 21;647:14;648:14; 649:12;650:5;651:19; 663:5;664:2,8 <b>Jeffrey's (5)</b> 453:16;518:17; 530:23;662:24;663:3 <b>jet (2)</b> 504:7;536:23 <b>Joan (1)</b> 604:15 <b>job (7)</b> 538:14,16;589:9,22; 591:19;639:20;640:8 <b>jobs (1)</b>	476:15 <b>join (2)</b> 423:14;486:13 <b>joined (7)</b> 443:14;525:8,22,25; 526:1,4,5 <b>Joseph (1)</b> 438:9 <b>jotting (1)</b> 499:19 <b>journalist (1)</b> 445:12 <b>Judge (13)</b> 414:16;620:12; 621:14;623:8;625:12; 626:10;636:3;637:1, 25;649:9;657:10; 668:20;670:22 <b>judicial (1)</b> 585:23 <b>Julliard (5)</b> 520:14,24;521:3,6,7 <b>July (1)</b> 592:21 <b>juncture (1)</b> 460:8 <b>June (7)</b> 550:25,25;551:3,12; 592:21;597:25;598:5 <b>juror (6)</b> 422:25;467:9; 496:12;505:21,25; 664:21 <b>jurors (30)</b> 422:12;426:5,9,15; 430:11,16;435:11,12; 437:7;439:6,6,9; 440:13;443:4;445:18; 467:15;496:10;559:14; 610:12,15,19;613:21; 614:3;620:8;621:11; 631:14,18,21;632:6; 633:1 <b>jurors' (3)</b> 424:3;467:3;545:13 <b>jury (59)</b> 408:1;410:21;422:4, 8;424:25;425:9; 426:13,21;427:5; 428:7,9,12,15,17; 440:9;470:23;473:18; 481:4,6;496:8,20; 505:15;506:4;559:10; 560:3,10;561:11; 579:8,11,13;582:2; 602:19;605:1,14; 607:1;609:22;617:8; 619:5;620:5;624:14; 625:23;628:6,9,11; 629:13,14,16;642:18; 645:12;650:17,24; 661:2;664:22;666:8, 17,22;667:18;671:7,13	<b>jury's (2)</b> 460:24;666:4 <b>K</b> <b>keep (15)</b> 414:21;426:20; 428:2,8;439:10;456:1; 608:15,16;632:6; 634:12;654:17;655:13; 657:20;659:16;671:10 <b>keeping (1)</b> 671:8 <b>Kelly (2)</b> 527:10;530:13 <b>kept (9)</b> 535:10;538:4; 655:18,20,21,22; 658:14,15;659:25 <b>kid (4)</b> 619:2;635:11; 639:25;640:7 <b>kids (1)</b> 589:8 <b>killers (1)</b> 590:24 <b>kind (7)</b> 431:6;456:15; 467:15;576:18;581:17; 622:7;632:11 <b>kinds (1)</b> 548:18 <b>King (18)</b> 503:10,13;504:4; 505:9;506:14,23,25; 507:10,21;508:11; 509:10,22;510:9,14; 511:6,16;535:16;594:4 <b>Kinks (1)</b> 675:12 <b>kissed (1)</b> 476:3 <b>knew (22)</b> 444:16;510:22; 511:23;525:10;526:6; 533:2;539:7,11,13,15; 556:7;570:16,17,17; 578:3;581:3,8;638:2,4; 642:22;650:20,21 <b>knowing (2)</b> 570:5,6 <b>knowledge (16)</b> 482:17,25;483:2,7; 484:6;485:12,21; 488:11;489:5,18,22; 563:16,17;568:17; 599:5;644:2 <b>known (3)</b> 651:2;664:2,8 <b>knows (9)</b> 482:22;484:7; 486:25;489:4;547:8; 568:22;569:17,20,21	<b>L</b> <b>LA (1)</b> 537:10 <b>label (1)</b> 441:6 <b>Lack (2)</b> 528:6;575:18 <b>ladies (1)</b> 428:16 <b>Lake (5)</b> 421:5;440:23; 663:25;664:1,8 <b>Lakes (1)</b> 454:18 <b>Lang (1)</b> 531:1 <b>language (4)</b> 560:15,17,23;576:23 <b>laps (1)</b> 439:10 <b>large (4)</b> 426:7;543:4;631:19; 665:5 <b>largest (2)</b> 653:9,18 <b>Larry (2)</b> 412:23;413:4 <b>last (39)</b> 434:11;442:3,14; 444:4,22,23;454:13; 456:6;459:17;468:13; 473:4,12;478:13; 480:15;513:17;514:2; 527:13;541:8;543:23; 551:23;553:20;557:6; 559:2;578:22;580:20; 598:3;600:13;603:24; 604:1;612:22;618:21; 632:20;642:18;645:12; 660:12,12;665:15,16, 20 <b>late (2)</b> 539:2;671:8 <b>later (13)</b> 448:4;454:10; 464:13;473:21;489:13; 500:11;507:2;516:7; 589:22;593:5,23,24; 641:24 <b>Latin (3)</b> 452:23;453:1;531:17 <b>Lauren (1)</b> 535:8 <b>law (12)</b> 409:6,8;411:12,17; 482:11;483:23;485:1; 487:25;489:11;538:10; 545:2;571:14 <b>laws (1)</b> 619:12 <b>lawsuit (6)</b>	448:12;484:17; 555:6;583:1;584:8; 597:23 <b>lawyer (30)</b> 483:17;486:9,9,15; 508:15;510:13;539:15, 21;542:6;543:2; 544:18,23,25;546:24; 547:6,9;548:12; 555:25;556:4;568:8, 11,15,22;572:19; 578:9;582:24;596:21, 23;597:15;673:17 <b>lawyers (7)</b> 446:9;475:23; 541:21,23;544:20; 547:6,9 <b>lawyer's (1)</b> 556:13 <b>lay (3)</b> 482:23;622:19; 641:23 <b>laying (1)</b> 473:4 <b>lead (6)</b> 624:19,24;625:5,9, 18;645:13 <b>leading (9)</b> 577:24;603:25; 604:12;607:23;618:14; 619:3;625:3;626:6; 643:21 <b>leads (2)</b> 485:8;625:10 <b>learn (3)</b> 640:15;649:14;651:9 <b>learned (7)</b> 507:2,5;511:11; 519:7;642:14;651:4,12 <b>least (8)</b> 486:11;488:18; 501:20;502:4,6; 621:23;626:22;674:7 <b>leave (2)</b> 420:8;627:15 <b>left (4)</b> 575:12;577:12; 633:9;639:13 <b>left-hand (2)</b> 439:15;544:7 <b>legal (9)</b> 482:23;484:9; 559:20;560:1,10,15,16, 23;561:10 <b>legally (1)</b> 598:23 <b>legs (1)</b> 524:21 <b>length (5)</b> 577:4;675:2,3,9,16 <b>lengthy (1)</b> 579:6 <b>Lesley (3)</b>
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531:22,25;532:5 <b>less (5)</b> 668:22;674:11; 675:10,13,15 <b>lesser (1)</b> 567:16 <b>lessons (1)</b> 535:19 <b>letter (26)</b> 412:16;414:18; 433:11,14,17,25; 438:23;483:19;485:1, 2;496:12;555:25; 556:4;654:18;655:1,3; 656:6;661:4,21,24; 662:1,5,6,11,17;669:21 <b>letters (12)</b> 431:22;432:17; 612:8,20;654:21,21,23; 655:11,16;656:16,17, 20 <b>level (5)</b> 440:17;603:6;655:2; 656:9;657:23 <b>license (2)</b> 630:24;631:24 <b>life (14)</b> 535:18;602:25; 616:3,25;619:13,20; 634:25;635:4,6,11; 636:4;637:3,23;658:6 <b>light (3)</b> 506:1;612:12;635:21 <b>light-colored (1)</b> 516:20 <b>Lights (1)</b> 434:22 <b>liked (2)</b> 464:1;609:25 <b>likely (5)</b> 408:22;428:4;635:7; 675:13,14 <b>likeness (2)</b> 428:25;629:10 <b>limine (2)</b> 529:4,4 <b>limit (1)</b> 607:19 <b>limitation (1)</b> 598:12 <b>limited (1)</b> 673:21 <b>limits (1)</b> 461:10 <b>line (12)</b> 409:2;430:24;437:5, 20;441:11;468:13; 566:25;567:3;585:10; 613:1,6;614:8 <b>linear (1)</b> 454:14 <b>linens (1)</b> 663:17	<b>lines (8)</b> 449:14;483:8,11; 586:23,24;590:12; 612:25;613:6 <b>Ling (1)</b> 518:21 <b>link (1)</b> 570:18 <b>linking (1)</b> 570:10 <b>Lion (18)</b> 503:10,13;504:4; 505:9;506:14,23,25; 507:10,21;508:11; 509:10,22;510:9,14; 511:6,16;535:16;594:4 <b>list (8)</b> 421:23;611:16; 613:9;663:2,13,14,16; 674:9 <b>listed (6)</b> 419:12;557:18; 588:20;633:10;659:13; 660:20 <b>listener (1)</b> 607:21 <b>listing (1)</b> 662:15 <b>literally (1)</b> 584:10 <b>litigation (14)</b> 482:17,21;484:1; 488:10;489:24;557:11; 567:13;568:2;569:7; 575:21;576:13,20; 578:5;581:5 <b>litigator (3)</b> 540:13,13,25 <b>Little (15)</b> 412:24;416:14; 430:8;438:1;441:17; 458:15;504:19;545:12; 576:20;580:17;584:23; 592:3;607:16;671:8; 673:11 <b>live (7)</b> 517:15,23;533:3; 553:23;606:15;634:8, 10 <b>lived (21)</b> 409:3;410:8,12,24, 24;413:13,21;418:8; 419:16,25;420:2,4,13, 17;457:7;525:4;533:5; 538:20;554:13;634:21; 636:18 <b>living (16)</b> 410:5;418:16;419:8; 461:24;517:25;533:2; 554:5,19;586:16; 604:6,7,9,11,14,17; 639:22 <b>loaded (1)</b>	575:16 <b>local (2)</b> 438:12;587:18 <b>locally (1)</b> 442:4 <b>located (2)</b> 653:14,15 <b>location (2)</b> 514:13,20 <b>locked (2)</b> 656:19;657:23 <b>lodge (24)</b> 656:8,10;661:6,7,9, 10,11,11,15,23;662:14, 20,24;663:7,20,25; 664:1,1,3,8,9,10; 669:20;670:18 <b>lodged (1)</b> 662:20 <b>logged (1)</b> 665:12 <b>logic (2)</b> 568:17,19 <b>logs (1)</b> 531:8 <b>long (8)</b> 484:6;587:2;591:19; 609:7;627:20;653:20; 655:20;658:14 <b>longer (1)</b> 575:11 <b>look (50)</b> 426:17;437:7;440:9, 13;445:18;459:9; 468:5;478:13;479:12; 480:14,15;488:7,9,23; 490:6;496:11,14; 499:12;500:15,17,22; 504:16;512:15;514:15; 515:11;520:12;532:15; 537:3;541:6;543:12, 16,23;544:6;549:9; 557:5,6;558:20;586:5; 592:24;593:9;594:18; 595:16;596:19;630:15, 17;631:18;632:21,22; 633:6;665:5 <b>looked (9)</b> 410:18;420:3,3; 490:11;496:14;505:19; 571:13;584:14;667:13 <b>looking (17)</b> 416:9;505:3;509:24; 523:11;544:6;549:22; 578:23;580:9;584:7; 593:10;613:3;640:23; 660:24;661:19;666:23; 667:9;668:9 <b>looks (3)</b> 433:15;442:18; 560:11 <b>Los (6)</b> 457:2,5,7;579:22;	589:23,25 <b>lost (3)</b> 515:25;636:19; 662:14 <b>lot (13)</b> 410:25;443:16; 463:13;499:19;506:19; 539:23;540:15;545:21; 560:9;561:10;589:16; 618:9,12 <b>loud (2)</b> 434:14;584:25 <b>love (1)</b> 434:20 <b>loving (2)</b> 434:18;435:5 <b>low (1)</b> 578:25 <b>lower (1)</b> 657:23 <b>lunch (11)</b> 545:13;559:8,9,12, 12;561:17,21;578:24; 579:13;604:22;605:7 <b>Luncheon (1)</b> 562:4 <b>lunches (1)</b> 559:10 <b>Lundberg (1)</b> 432:25	517:7,18,21,23; 533:11,19 <b>Many (11)</b> 438:5;448:4;453:6; 500:18;501:4;503:5; 514:19;613:15;616:7; 632:18;657:1 <b>Mar-a-Lago (2)</b> 521:11;522:15 <b>Mark (2)</b> 518:18;530:23 <b>marked (13)</b> 435:9;439:7;482:5; 583:5,6,19,20;597:18; 630:17;656:1;658:17; 660:3;664:5 <b>Married (1)</b> 525:6 <b>mask (3)</b> 467:1;563:13;669:4 <b>massage (9)</b> 471:6;476:9;517:1; 518:4,23;524:15; 643:20;644:5,20 <b>massages (9)</b> 522:24;523:25; 524:4,13;525:8,18; 526:19;527:8;530:16 <b>masturbate (1)</b> 617:22 <b>masturbated (1)</b> 498:6 <b>masturbation (1)</b> 476:18 <b>match (1)</b> 572:14 <b>material (21)</b> 408:21;412:15; 413:18,22;414:2,15,23, 24,24;427:11;462:10; 620:17,21;621:23; 622:1,8;624:2;648:8, 15,21;675:15 <b>materials (5)</b> 426:4,6,10;427:3; 463:13 <b>math (2)</b> 430:3;453:6 <b>Matt (22)</b> 546:12,19;547:14; 553:4;554:15;577:10; 620:13;621:20,21,24; 622:16;629:19,20,22; 630:1,10;632:3,8; 639:6;646:16;647:3; 652:8 <b>matter (11)</b> 415:24;416:2,17,23; 417:3;483:14;571:10; 574:14;620:12;636:4; 637:4 <b>Matters (9)</b> 408:2;481:7;488:17;
<b>M</b>				
<b>ma'am (2)</b> 430:23;442:13 <b>Maddy (1)</b> 657:24 <b>maintain (2)</b> 654:13;658:12 <b>maintained (3)</b> 657:22,23;659:22 <b>major (6)</b> 534:21;654:17; 655:7;670:13,15,16 <b>majority (1)</b> 580:23 <b>makes (3)</b> 428:9;593:17;659:19 <b>making (3)</b> 515:7;558:6;599:2 <b>man (6)</b> 443:14,19,24; 452:24;453:1;645:8 <b>manager (4)</b> 533:15;588:22,23; 589:1 <b>managing (1)</b> 654:24 <b>manila (2)</b> 655:17;657:24 <b>Manko (1)</b> 487:15 <b>mansion (6)</b>				

496:4;563:3;620:10; 621:12;628:10;671:15 <b>Matt's (1)</b> 624:15 <b>Maxwell (44)</b> 410:5;443:1,7; 444:19;449:1;450:13, 21;454:1,8;456:11; 470:10;474:12;475:24; 476:2;483:23;501:10, 15,21;502:22;505:8; 506:14,23;507:10; 511:10;551:6;558:6; 578:5;581:5;592:20; 601:21;604:10;605:10; 606:12;616:19,21; 618:13;622:2;626:1; 636:6;651:5,10,12; 662:12,14 <b>Maxwell's (1)</b> 449:3 <b>may (101)</b> 411:10;416:8; 418:10;421:4;423:4; 424:9,17;429:2; 430:16;436:15;437:11; 438:15,17;440:5,13; 441:24;442:1;447:19; 456:8;463:21;477:19; 481:8,9;482:19;486:7; 488:4;489:14;496:15; 499:5;500:1;503:24; 506:9;507:21;508:11; 509:17;513:24;515:6; 523:15;528:9;532:25; 534:20;545:7,8; 549:23;551:4,12; 555:1;559:7,15;563:5; 568:4;576:21;579:16; 583:14;595:25;597:3; 600:18;604:13,24; 607:23;610:15,19; 613:24;614:1,20; 617:17;620:2,9; 629:16,17,20,25; 631:14,18;633:6; 635:23;643:23;646:13; 652:8,11,13,20;653:11; 657:6,8;663:1;664:18; 665:5;666:1,2,2,8; 667:22;668:17,18; 670:22;671:5,14; 673:17;674:21,21 <b>Maybe (11)</b> 447:20;496:18; 520:1;541:5;546:10; 550:24;551:21;567:17; 593:6;628:4;668:22 <b>McWhorter (1)</b> 656:19 <b>mean (17)</b> 418:20,22,23; 420:20;421:12;488:3;	536:8;564:1;573:1; 605:2;611:23;617:18; 618:6;619:9;624:7; 637:15,19 <b>meaning (2)</b> 575:10;618:7 <b>means (4)</b> 546:23;555:24; 615:1;670:5 <b>meant (7)</b> 422:17,19;423:8; 470:6;511:15;619:1,6 <b>meantime (1)</b> 538:14 <b>media (6)</b> 541:18;542:2,4; 548:20;628:2,5 <b>meet (6)</b> 447:3,10;520:20; 522:15;561:24;633:22 <b>meeting (30)</b> 444:3,7,8;445:2,5,9; 448:16;450:22;455:1, 3,13;461:23;462:12, 24;475:8;508:14; 520:23;527:22,25; 544:12,15;545:5; 574:9;594:10,17,20; 601:22;602:15;616:21; 636:5 <b>meetings (24)</b> 451:17;453:12; 472:13;505:3;580:22, 23;600:22,25;601:3,16, 19,24,25;602:1,6,13, 17,20;603:1,14,18,21, 24,25 <b>melodramatic (4)</b> 590:8,10;591:7,9 <b>Members (11)</b> 481:4;538:20; 547:12;559:9;579:12; 606:14,15;620:5; 629:16;634:22;647:7 <b>memorable (1)</b> 504:6 <b>memories (2)</b> 617:2,14 <b>memorized (1)</b> 425:15 <b>memory (32)</b> 413:16;416:1;417:3, 9;454:13,14;460:21; 471:1,5,10,14;472:17, 24;473:10,12,17,18; 474:22;476:23;477:2; 490:1;502:8,13,15; 512:24;514:12;517:3; 592:8;593:6;616:21, 24;618:2 <b>Menninger (246)</b> 408:9,11;410:1; 420:9,11,12,15,22;	421:1,9;422:21; 423:12,24;424:13,14; 425:13,14;426:17; 427:22;429:2,3,8; 430:1,7,18;432:19,21, 23;433:3,7,9,10; 435:12,16,18;436:8,20; 437:7;439:5,22;440:3, 14;441:24;443:3; 445:19;447:1,5,7; 452:7,14;456:9; 459:16;460:15,20; 461:5,15,19,23;462:2; 463:3,8,21,24;464:5, 21,24;465:7,13,22; 467:1,7,11,22,23; 472:19;473:3,9; 477:18;478:2,5;480:1; 481:1;482:14;483:12, 13,22;484:3,22,25; 485:8;486:1,6,18; 487:12;489:23;496:6, 21,24,25;497:1;498:20, 24;499:5;500:9,10,22; 501:9;502:16;504:19, 22,24;505:6;506:1,9, 10,11;508:1,20;509:3, 13,18,19;512:3; 514:25;515:5;516:1; 520:6,7;523:12,18,24; 528:6;529:10;537:6; 540:4;545:7,10,14,18, 19;546:10;549:17; 554:25;555:5;559:4; 560:6;561:18,20; 562:1;563:4,7,10,12, 14,20;564:1,10;566:10, 13,14,21;567:2,14,22; 568:4,7,13;569:19; 570:24;571:7,17; 572:8,22,25;573:5,14, 16,20,23;574:20;575:1, 9;576:2,4,8,14,17; 577:22,23;578:2,21,25; 579:16,17,19;580:12; 583:12,17,18,23;584:2, 6,23;585:4,8,11,20,25; 586:7,10,11;587:25; 588:3;593:12;597:1,5; 598:19,23;599:1,11; 600:3;602:8;604:12, 23;607:4,13,18;609:4; 610:17,18;611:10; 613:25;614:11;617:10; 618:14;619:3,17,25; 620:1;626:2;627:11, 21;628:12,17,22;636:7 <b>Menninger's (2)</b> 428:20;482:10 <b>Mental (1)</b> 590:22 <b>mention (2)</b> 442:24;443:1	<b>mentioned (13)</b> 456:14;477:14; 534:8,10;539:19,23; 567:1,7;576:20; 653:11;661:9;663:13; 669:21 <b>mentors (1)</b> 450:17 <b>met (42)</b> 410:5,13;420:17; 443:6;445:2;446:13; 451:20;453:20;473:21; 498:5;503:8;504:10; 505:7;520:17;521:17; 536:2;544:3,8;580:18; 592:8,13,14,16,19; 593:19,25;594:2,13,15; 596:23;601:20;604:10; 605:10;608:11;609:25; 616:18;641:16,18,19; 644:14,15;647:7 <b>Mexican (1)</b> 591:5 <b>Mexico (20)</b> 512:8,12,18;513:2,6, 9,19,22;514:4,18; 515:14,17,25;516:3,6; 518:7,14,18,21,23 <b>mezzanine (1)</b> 510:19 <b>mic (2)</b> 419:4;632:2 <b>Michelle (5)</b> 526:22,24;527:5; 530:9;533:2 <b>Michigan (5)</b> 653:15,16,17,18,19 <b>microphone (4)</b> 419:1;561:22;563:6; 564:16 <b>mid (1)</b> 516:12 <b>mid-1990s (1)</b> 552:6 <b>mid-afternoon (1)</b> 620:6 <b>middle (13)</b> 452:8;455:10; 457:17,17;474:4; 479:15,20;512:16; 541:8;587:4;594:18; 604:6;611:15 <b>might (21)</b> 416:21,22,23; 417:16;422:5;483:24; 490:4;563:15;567:20; 568:1,7;570:11; 575:20;589:18;592:15; 596:4,4;626:25; 654:18;655:6;673:10 <b>Mike (5)</b> 594:10,20,22;595:4, 24	<b>million (9)</b> 483:22;484:1,17; 486:19;540:17;541:1; 558:14,18;655:6 <b>mind (6)</b> 409:4;421:10;564:3; 570:11;630:16;671:10 <b>mindful (1)</b> 572:4 <b>mine (3)</b> 506:18;513:14; 582:10 <b>minimize (1)</b> 428:2 <b>minors (1)</b> 623:20 <b>minute (8)</b> 439:6;499:6;576:24; 641:20,20;643:8,8; 650:15 <b>minutes (13)</b> 424:23;449:10; 481:23;496:2;559:12; 561:17,24;562:3; 579:2;594:10;620:7; 653:17;668:21 <b>Mischaracterizes (1)</b> 503:3 <b>mischaracterizing (3)</b> 501:12,25;523:6 <b>misconduct (3)</b> 582:12;598:11,15 <b>misleading (2)</b> 507:24;522:20 <b>misremembering (2)</b> 413:12,13 <b>Miss (1)</b> 552:9 <b>missed (1)</b> 496:15 <b>missing (2)</b> 589:16;663:4 <b>misspoke (1)</b> 631:9 <b>misstates (1)</b> 614:11 <b>mistake (1)</b> 415:6 <b>mistaken (1)</b> 506:24 <b>MJS (1)</b> 665:14 <b>Mmm (1)</b> 552:12 <b>Mmm-hmm (2)</b> 524:18;614:7 <b>mock (1)</b> 536:13 <b>model (1)</b> 527:15 <b>models (1)</b> 560:20 <b>model-types (1)</b>
--	---	--	--	--

530:15 <b>modified (1)</b> 665:13 <b>Moe (274)</b> 418:10,13,21,24; 419:2,5,7,14;421:20; 422:13,16;423:1,18,21; 424:8,9,11,18,19; 425:2,19;426:24; 427:2,12;428:11; 430:15;436:11;437:10; 438:15,19;439:24; 440:9,11;446:10; 447:4,14,18;450:6; 451:24;452:1,4,5,10, 11,15;453:22,24; 455:24;456:2,4; 459:12;460:2;461:21; 462:18;465:18;468:19; 469:21;470:4,7,17; 471:3,11,16;472:1,11, 18;473:2,6,14;474:5, 17,25;477:25;478:19; 479:2;481:10,13,20; 482:3,8,16;483:3; 484:5;485:11;486:23; 487:3,5,11,17;488:1,6, 24;489:20;490:5,13, 16;496:5;498:17,21; 499:24;500:4,20; 501:12,16,24;502:13, 23;503:3,23;505:1,10; 507:8,11,23;508:12,19; 509:1,5,7,11,13,15,25; 511:17,21;512:1,5; 514:23;515:20;522:3, 19;523:6,15,22; 525:19;528:5,9;529:3; 532:20,24;540:3; 543:6,8;546:8,21; 547:7,19,22;549:15,18; 554:23;556:2,15; 558:2;559:7,18; 560:18,21,25;561:9,15; 564:12,13,17;565:13, 22;566:3;568:16,24; 569:9;571:18,20; 572:2,13;573:24,25; 575:8,22,23;576:1,15; 577:3,9,19;578:12,15, 18;579:3,5;580:11; 584:3,4,16;586:3; 595:19,22;596:1; 598:17,20;599:4,7; 600:7,9,18,20;607:6, 23;610:9,15;613:21; 614:2,4,14,15;617:12, 16;618:16,19,20; 619:24;620:11;621:3, 13,15;622:8,12,13; 624:12;625:1,8,18; 626:5,9,12;627:3,14; 628:8;629:2,8,12,17,	18,25;630:2,5,7;631:2, 8,11,14,20;632:2; 633:7,16;634:1; 635:18;639:2,4,5; 641:23;642:3,5,19,20; 645:13,14;646:11; 648:4,9,24;649:17; 650:3;651:24;652:2 <b>mom (12)</b> 443:25;448:22; 450:4,11;531:3; 537:17,20;590:14; 640:8,10;650:10,19 <b>moment (30)</b> 424:9;430:13; 438:15;461:13;465:24; 467:16,20;477:18; 481:8,12;482:7; 504:20;505:11;523:15; 532:21,21;545:7; 547:20;597:1,6;610:9; 618:16;632:7,7; 651:24;657:7;662:16; 663:13;668:17;670:22 <b>mom's (2)</b> 448:5,7 <b>Monday (1)</b> 674:13 <b>money (37)</b> 483:15,18;533:22; 540:15;541:4,13,14; 555:23;556:1,5; 558:16,18;559:24; 560:7,12,13;564:22; 570:1,7;605:2,3,7; 619:1,6,10,15;639:11, 19;642:13,25;643:5,6; 647:3;648:6;650:13, 19;651:1 <b>month (2)</b> 460:23;673:6 <b>months (8)</b> 449:24,24;451:4,8; 460:23;472:9;540:23; 604:1 <b>morally (1)</b> 567:5 <b>more (33)</b> 409:22;425:8; 427:24;430:9;432:17; 487:14;488:8;537:7; 548:14;558:16;569:25; 570:7;575:11;580:19; 584:20;587:7;603:7, 11,20;616:6;628:20; 635:15;640:11,13; 641:22;642:1;645:25; 655:6;662:25;668:21; 673:11;674:9;675:2 <b>morning (12)</b> 421:23,25;428:16; 429:9,10;481:3,16,23; 482:4;485:16;671:12;	675:19 <b>morphed (1)</b> 576:21 <b>most (3)</b> 553:16;602:24;635:6 <b>mostly (2)</b> 427:18;513:24 <b>mother (58)</b> 442:21;449:7,9,17; 451:1,11,15,16,25; 452:16,19;454:20; 534:11,13,14;553:8; 554:5;581:13,16,25; 582:7,11,14,21,24; 583:1,10;584:8; 585:16;605:2;635:9; 636:9;637:10;639:10, 19;645:7;647:11,14; 648:5,6,11,12,13,24; 649:3,16;650:5,11,13, 14,14,17,18,20,20,21, 25;651:1 <b>mother's (1)</b> 604:15 <b>motion (3)</b> 486:10;490:10;529:4 <b>motions (1)</b> 529:3 <b>motivating (1)</b> 572:15 <b>motivation (1)</b> 570:10 <b>motive (3)</b> 487:13;488:18; 564:23 <b>move (18)</b> 410:19;419:25; 427:24;439:22;461:18; 484:21;485:6,24; 486:5;490:3;559:4; 586:6;596:17;605:24; 606:3;615:11;619:13, 20 <b>moved (18)</b> 410:17,22;411:5; 415:6;418:17;419:11; 420:18;537:10;579:22; 589:3,25;596:7,11,15; 605:21,25;606:5; 662:22 <b>moves (1)</b> 564:14 <b>movie (9)</b> 458:19,24;459:4,6; 468:3;469:6;510:15; 511:16;591:24 <b>movies (4)</b> 431:17;457:22; 458:16;467:24 <b>moving (6)</b> 428:2;436:8;472:25; 580:13;585:24;598:18 <b>much (7)</b>	424:22;428:17; 512:12;513:23;541:4, 13;618:19 <b>multipage (1)</b> 559:20 <b>multiple (3)</b> 458:12;461:11; 596:23 <b>music (2)</b> 434:20;653:12 <b>must (2)</b> 464:10;624:14 <b>myself (5)</b> 451:11;579:1; 619:16;656:22;659:6 <b>mysterious (1)</b> 572:11  <b>N</b>  <b>naked (1)</b> 470:3 <b>name (37)</b> 430:21,24;434:13; 437:5,13,21;479:16,21; 527:13;549:12,19; 558:25;579:25;580:2; 583:14;584:11;585:3; 607:15,17;608:15,16; 609:2;630:10,25; 631:22;633:10;640:15, 18,19;642:11;646:2; 660:11,12,12;663:25; 665:15,16 <b>named (7)</b> 524:12;525:22; 526:10,22;527:10; 531:22;651:4 <b>names (16)</b> 431:21;441:20; 524:7,10;584:25; 585:5,10,12;613:6; 658:19;660:7;663:22, 24;666:10;667:14; 668:1 <b>name's (1)</b> 665:21 <b>naming (1)</b> 585:5 <b>Narrative (1)</b> 619:17 <b>narrow (2)</b> 639:3;674:1 <b>narrowed (2)</b> 422:1;425:4 <b>Naturally (1)</b> 590:13 <b>nature (6)</b> 427:6;598:13,14; 634:14,18;637:18 <b>navigate (4)</b> 607:24;625:9;627:3, 18	<b>nearby (1)</b> 538:20 <b>necessarily (1)</b> 622:5 <b>necessary (1)</b> 583:14 <b>need (21)</b> 429:12;436:21; 464:9;487:23;490:1; 505:12;506:8;512:23; 523:16;530:2;541:11; 557:6;577:2;584:24; 627:6,17;633:17; 641:3,9;671:20;675:17 <b>needed (3)</b> 554:3,9;579:20 <b>needs (4)</b> 621:17;628:13; 629:1;675:15 <b>negotiations (1)</b> 483:5 <b>New (64)</b> 420:18;434:5;438:9, 11;440:19;455:5,18; 497:18,20;498:4,9; 499:9,16,22;500:3,13, 19;501:4,15,21;502:6; 503:10,12;505:8; 506:13,23,24;507:10, 20;508:10;509:22; 511:10;512:8,12,17; 513:2,6,9,19,22;514:4, 18;515:14,17,24;516:3, 6;517:7,12;518:7,14, 18,21,23;533:2,3,7; 589:3;594:11;596:7, 12,15,17;661:23 <b>news (8)</b> 445:8,11,11;519:8; 539:2;546:15;641:11; 651:11 <b>newspaper (2)</b> 441:17;443:19 <b>newspapers (1)</b> 587:18 <b>next (59)</b> 421:3,4;432:4,14; 436:4,5;437:23; 438:23,24;439:8; 441:4,11;446:19; 454:4,5;459:6,18; 465:11;466:3;468:3; 469:3,7;472:19;473:4; 479:23;490:18;502:16; 514:5;521:21;528:11; 529:14;557:24;562:5; 577:5,9;578:20; 599:12;605:18;613:19; 614:8,16;620:13; 621:20;629:5,10,17; 633:24;635:25;638:9; 649:21;652:11;656:11; 662:3,15,16;663:11;
---	--	--	---	--

666:19;671:25;675:5 <b>Nice (5)</b> 428:17;458:22; 524:21;526:15;579:13 <b>night (1)</b> 671:12 <b>nine (1)</b> 598:8 <b>nobody (2)</b> 464:1;506:18 <b>noncollateral (1)</b> 417:3 <b>none (6)</b> 442:23;519:10; 551:6;571:14;598:16; 626:21 <b>nonetheless (1)</b> 670:13 <b>nonprivileged (1)</b> 566:1 <b>nonprofit (1)</b> 653:8 <b>nor (1)</b> 509:17 <b>normal (3)</b> 458:9,24;654:7 <b>northern (3)</b> 548:25;653:17,18 <b>notarize (1)</b> 556:21 <b>note (5)</b> 414:16;566:3; 567:10;666:11;667:3 <b>notes (17)</b> 415:5;420:25;421:1, 2,9;450:4;499:19; 505:3;566:4;589:15, 18;601:16;602:1,3,5,8; 654:19 <b>notice (2)</b> 545:15;585:23 <b>notified (1)</b> 426:3 <b>notion (1)</b> 415:19 <b>November (2)</b> 453:19;502:17 <b>Nowadays (1)</b> 655:14 <b>nowhere (1)</b> 612:2 <b>number (22)</b> 412:23;421:25; 425:20;426:8;448:5,7; 453:22;460:4;485:15; 505:2;519:21;529:11, 12;530:18;536:5,6; 538:20;587:16;590:11; 592:11;598:8;623:1 <b>numbers (2)</b> 422:25;537:4 <b>numerous (1)</b> 587:6	<b>O</b>  <b>oath (8)</b> 428:23;453:7; 496:23;579:15;597:10, 13,16;636:19 <b>object (20)</b> 427:6;452:1;455:24; 487:4,5;498:17,21; 501:12,24;509:15,25; 522:3;559:8;569:7; 577:16,18;586:3; 598:22;624:1,2 <b>objected (1)</b> 509:17 <b>objecting (1)</b> 625:14 <b>objection (134)</b> 417:14;425:24; 426:22;427:10,11; 430:14,15;436:11; 437:9,10;439:24; 440:6;447:4,14,18; 450:9;452:3,12;456:3, 8;464:3,6;465:10; 468:19;470:7,17; 471:3,11,16;472:1,11, 18;473:2,14;474:17, 25;478:19;479:2; 484:7;487:7;490:7; 501:16;502:23;503:3, 23;505:10;507:8,11, 23;508:12,19;509:1, 11;511:17,21;512:1,5; 514:23;515:20;522:19; 523:6;525:19;528:5,8; 529:7;532:20,24; 540:3;543:6;546:8,21; 547:7,19;554:23; 556:2,15;559:19; 561:7;566:9;568:14; 569:9;578:11;580:11; 584:3,4,16;595:19,22; 596:1;598:17;599:3; 600:2;604:12,23; 607:4,13,18;609:4; 610:17;613:24;614:11; 618:14;619:3,17; 624:1;626:24;627:21; 631:4,5,16,17;633:4,5; 635:14;637:18,21,23; 642:16,17;643:21; 644:9;645:10;646:8; 647:22;657:13;659:11; 660:18;664:13,25; 665:2;666:7,20,21; 667:21 <b>objectionable (2)</b> 487:9;509:17 <b>objections (4)</b> 417:8;426:25; 529:11,13	<b>objects (1)</b> 571:24 <b>obligated (1)</b> 460:16 <b>observations (1)</b> 647:10 <b>observe (1)</b> 626:22 <b>observing (1)</b> 627:23 <b>obviously (2)</b> 567:21;639:12 <b>occasion (6)</b> 453:25;456:10; 457:19;500:2;520:16; 583:9 <b>occurred (7)</b> 497:5;513:25;514:4, 20;515:18;516:3; 523:20 <b>occurring (1)</b> 515:14 <b>occurs (1)</b> 436:17 <b>October (4)</b> 437:1;438:2;449:23; 450:3 <b>off (8)</b> 408:16;431:3;467:1; 470:5;563:13;578:22; 632:20;669:4 <b>offenses (2)</b> 598:11,15 <b>offer (6)</b> 416:22;482:12; 558:8,11,13;585:20 <b>offered (12)</b> 409:16;416:16; 431:22;486:8,8,19; 487:1;489:2;572:6; 607:20;648:22,23 <b>offering (5)</b> 409:11;427:14; 565:14;621:20;627:12 <b>offers (5)</b> 631:2;656:24;659:9; 660:16;664:12 <b>offhand (1)</b> 419:14 <b>office (6)</b> 448:22,25;453:16; 454:6;531:22;659:21 <b>officers (1)</b> 655:7 <b>often (2)</b> 411:22;624:16 <b>old (16)</b> 434:9;453:2;498:4; 506:22;533:20;549:21; 550:2,14,25;551:17; 552:1;595:4;611:2; 617:5;644:7,12 <b>older (5)</b> 444:6;456:17,20,22; 527:15 <b>omit (1)</b> 434:13 <b>once (13)</b> 457:17;504:8; 534:22;538:23;554:20; 603:21;640:11,12,13; 642:14,14;657:24; 659:5 <b>one (92)</b> 408:15;410:8;412:7, 23;420:22;422:9,22; 423:6;424:9;425:5; 430:13;432:17,17,23, 24;437:20;439:2; 440:22;441:24;455:12; 456:20,22;457:2; 467:2,3;472:14; 473:12;477:13,16,18; 482:7;483:15,19,24; 484:19,19,20;486:6; 487:15;490:10;496:11; 500:12;501:14,18,20; 502:6;516:17;519:5, 13;520:16;523:16; 528:7;536:25;545:7; 547:21;549:7;550:5; 551:23;552:11;554:11; 561:1;563:7;566:21; 574:23;575:3,10; 583:9,13,21;590:21; 597:1,19;600:12,13; 606:1;612:22;618:16, 21;621:18,25;623:11; 627:22;628:20;639:13, 20,22;642:15;643:3; 647:24;662:25;670:22; 675:14 <b>ones (3)</b> 423:3;580:13;654:25 <b>online (1)</b> 548:17 <b>only (38)</b> 415:1;417:13;424:5; 427:24;445:2,17; 447:2;449:19;450:1, 10;460:7;475:16; 478:21;483:5,8; 486:24;489:3;500:12; 507:9,14;516:17; 517:12;519:5,7,13; 534:18;536:25;552:20, 23;571:7;572:20; 608:11;619:12;623:11; 636:25;644:1;660:9; 673:3 <b>open (9)</b> 409:3;429:12; 437:11;466:2;496:1; 530:1;626:25;639:1; 650:1 <b>opening (1)</b> 649:7 <b>opens (1)</b> 561:9 <b>opera (3)</b> 538:14;589:25;590:5 <b>opportunity (7)</b> 426:14;460:17; 464:14,15;571:20; 602:5;621:15 <b>opposed (2)</b> 412:4;670:9 <b>oral (4)</b> 476:12;480:11,17,21 <b>orchestra (1)</b> 611:17 <b>order (8)</b> 425:22;428:25; 482:20;483:6;608:7; 625:3;630:2,12 <b>ordinary (2)</b> 655:22;659:25 <b>organization (2)</b> 441:13;653:8 <b>organized (1)</b> 434:20 <b>orgies (2)</b> 519:10;523:2 <b>original (4)</b> 510:12;583:12,19; 585:25 <b>originals (2)</b> 583:21;585:21 <b>others (2)</b> 446:10;582:15 <b>otherwise (8)</b> 409:5;426:9;489:3; 519:7;598:11;627:4,7, 19 <b>out (47)</b> 408:4;422:4,8,8; 425:9;426:13,15; 428:7;434:14;435:16; 447:15;469:15;481:8; 484:16;499:20;504:4; 505:17;507:15;511:6, 11;525:12;527:1,3; 548:20;556:13,17; 576:19;584:25;594:8; 605:21;606:3,5; 607:17;608:23;618:2; 620:17;622:9,14; 623:21;626:19;640:23; 643:4;645:18;649:13; 660:8;664:22;675:11 <b>outcome (4)</b> 564:19;569:3; 574:13;619:21 <b>out-of-pocket (1)</b> 619:15 <b>outset (1)</b> 426:18 <b>outside (1)</b> 549:24
--	--	--

<p><b>outweigh (1)</b> 487:23</p> <p><b>over (16)</b> 444:4,22,23;450:6; 453:4;457:24;458:6,8; 463:13;503:6;549:3; 554:12;580:20;590:12; 603:7;655:19</p> <p><b>overflow (1)</b> 628:1</p> <p><b>overrule (3)</b> 500:8;561:7;600:2</p> <p><b>Overruled (30)</b> 447:19;470:18; 471:17;473:15;474:18; 478:20;502:24;503:24; 507:13;510:3;522:21; 523:8,8;525:20;529:9; 532:25;546:22;547:23; 561:14;596:2;599:8; 604:13,24;607:14; 617:15;619:18;643:22; 644:11;646:12;649:20</p> <p><b>overruling (1)</b> 488:21</p> <p><b>oversee (1)</b> 654:1</p> <p><b>overseeing (1)</b> 654:3</p> <p><b>overturns (1)</b> 489:16</p> <p><b>own (7)</b> 411:19,20;434:17; 457:19;484:25;619:5; 625:13</p>	<p>593:9;594:18,18; 596:19;598:3,9; 599:12;611:8;612:23; 613:3;633:24;635:25; 638:9;649:21;659:1; 661:17;662:3,8,15,16; 663:12;666:12;667:3; 671:25</p> <p><b>pageant (2)</b> 552:7,9</p> <p><b>pages (8)</b> 427:4;490:17;580:9; 657:1,2,5,11;671:24</p> <p><b>PAGLIUCA (8)</b> 673:5,11,24;674:4,7, 19;675:9,12</p> <p><b>paid (13)</b> 535:19,23;537:1; 540:15;541:14;553:18; 580:7;605:17,17,18; 619:15;640:8;669:7</p> <p><b>pain (2)</b> 591:15;619:14</p> <p><b>Palm (13)</b> 418:16;433:21; 437:23;449:12,13; 451:5,9;497:8,10; 516:14,17;582:18; 604:7</p> <p><b>Palma (1)</b> 604:14</p> <p><b>pants (1)</b> 535:8</p> <p><b>paper (2)</b> 435:10;658:8</p> <p><b>papers (1)</b> 415:19</p> <p><b>paragraph (58)</b> 434:13,15;445:25; 452:8,9;453:21,23; 454:5;455:8,9,10,11; 456:7;459:14,17; 468:12,13;474:3,4; 477:23;478:14,14; 479:14,15,19,20,20; 480:15,16;497:24; 499:13;500:17,18; 501:8,10,10,11;504:18, 22,23;506:16;508:3; 512:16,16;513:17; 515:12;520:13;522:6; 532:16;541:8,8; 574:21;585:9,13; 592:18,24;593:13; 596:14</p> <p><b>parents (2)</b> 661:12,14</p> <p><b>park (1)</b> 448:9</p> <p><b>parlays (1)</b> 623:20</p> <p><b>part (12)</b> 409:12,17;433:6;</p>	<p>450:24;497:14;547:17; 570:19;572:10;573:11; 625:25;659:1;663:3</p> <p><b>participant (1)</b> 526:11</p> <p><b>participants (3)</b> 519:10;524:4,8</p> <p><b>participated (4)</b> 524:12;552:6; 556:10;571:5</p> <p><b>participating (3)</b> 557:2;568:1;572:21</p> <p><b>participation (3)</b> 566:11;567:12;569:6</p> <p><b>particular (25)</b> 417:25;418:14; 419:15;422:6;424:5,6; 461:24;487:1;529:5; 535:21,23;550:2; 560:5;561:12,13; 597:16;610:7;624:22; 626:7;643:16;654:10, 21,24;659:6,8</p> <p><b>particularly (2)</b> 549:22;626:5</p> <p><b>parties (1)</b> 490:10</p> <p><b>party (14)</b> 464:9,10,15;483:16, 18;519:25;520:4,10, 17;560:2;594:22; 595:10,24,25</p> <p><b>party's (1)</b> 464:11</p> <p><b>passage (2)</b> 452:6;456:2</p> <p><b>passed (4)</b> 595:7,8,9;639:16</p> <p><b>past (1)</b> 611:17</p> <p><b>paths (1)</b> 409:22</p> <p><b>patience (1)</b> 579:12</p> <p><b>pause (11)</b> 425:10;460:12; 467:2,18;477:20; 500:7;505:22;545:9; 577:1;618:18;632:8</p> <p><b>pay (9)</b> 541:13;555:22,25; 605:3;639:25;640:7, 10;641:13;661:15</p> <p><b>payable (1)</b> 654:2</p> <p><b>paying (1)</b> 604:22</p> <p><b>payment (1)</b> 566:19</p> <p><b>payments (1)</b> 535:25</p> <p><b>payout (1)</b> 566:15</p>	<p><b>payroll (1)</b> 654:2</p> <p><b>peace (1)</b> 616:5</p> <p><b>pending (7)</b> 483:23;484:2,18; 486:16;574:6;575:12, 21</p> <p><b>penis (4)</b> 617:6,8,18,20</p> <p><b>people (24)</b> 444:4;449:19; 450:10,17;519:21; 527:22;531:5;533:19; 539:10;541:19;546:4, 7;548:1,14,16;603:11, 15,19,22;612:15; 623:11;624:25;665:20; 670:1</p> <p><b>per (2)</b> 435:20;658:15</p> <p><b>percent (2)</b> 502:21;503:2</p> <p><b>perform (3)</b> 476:12,15;587:8</p> <p><b>performance (3)</b> 434:21;442:4;661:13</p> <p><b>performances (9)</b> 431:17;438:5; 441:20,21;670:6,9,11, 14,15</p> <p><b>performed (8)</b> 433:16;441:22; 442:3;552:25;587:6, 10,16;611:16</p> <p><b>performing (3)</b> 442:6;480:11;589:6</p> <p><b>perhaps (2)</b> 511:15;551:19</p> <p><b>period (8)</b> 416:2;471:23;472:9; 522:7;545:20;547:16; 623:2;670:19</p> <p><b>permissible (2)</b> 489:4;577:25</p> <p><b>permission (8)</b> 408:6;610:11; 613:21;664:17;666:3, 16;667:17;673:19</p> <p><b>permit (1)</b> 664:22</p> <p><b>permitted (5)</b> 430:11;626:5; 627:15;628:15;631:6</p> <p><b>permitting (1)</b> 629:6</p> <p><b>Perry (2)</b> 518:20;531:1</p> <p><b>person (16)</b> 433:16;445:12; 449:3;504:6;527:10; 536:2;570:6;584:13; 609:10;630:13;633:10,</p>	<p>13;640:10;641:7; 642:11;655:3</p> <p><b>personal (10)</b> 408:5;489:5,18,22; 543:2;544:20;581:22, 23;599:5;663:3</p> <p><b>personality (1)</b> 434:17</p> <p><b>personally (2)</b> 556:18;660:13</p> <p><b>persons (3)</b> 585:1,12;598:9</p> <p><b>phone (15)</b> 448:5,7;522:12; 531:25;532:13,18; 533:7,8;538:6,8; 539:10;609:11,13,15; 654:19</p> <p><b>photo (3)</b> 535:10;659:1;664:10</p> <p><b>photograph (15)</b> 409:1,9,25;410:22; 413:20;414:10,14; 417:14,19,25;419:22; 420:1,3;535:13;537:9</p> <p><b>photographs (8)</b> 432:4;529:6;530:5; 534:25;535:5;537:22, 25;538:2</p> <p><b>photos (1)</b> 413:2</p> <p><b>phrase (1)</b> 461:16</p> <p><b>phrased (3)</b> 509:8;574:3,16</p> <p><b>physical (1)</b> 598:16</p> <p><b>pick (6)</b> 429:11;430:16; 539:10;610:19;631:18; 656:11</p> <p><b>picked (2)</b> 453:1,4</p> <p><b>picnic (1)</b> 443:12</p> <p><b>pictures (4)</b> 412:24;516:23; 527:23;528:4</p> <p><b>piece (1)</b> 408:12</p> <p><b>pieced (4)</b> 546:17,18,19,23</p> <p><b>pieces (4)</b> 547:16;548:2; 570:10;583:20</p> <p><b>pierce (1)</b> 561:19</p> <p><b>piercing (2)</b> 673:4;674:16</p> <p><b>pillows (1)</b> 663:17</p> <p><b>place (10)</b> 410:9;413:20;</p>
---	---	--	---	--

420:17;424:3,12; 514:19;604:17;619:10; 639:23;663:8 <b>plaid (1)</b> 535:8 <b>plan (5)</b> 417:4;569:25;570:4, 7;579:7 <b>plane (7)</b> 512:12,18;513:3,6; 531:12,12,15 <b>planning (2)</b> 580:12;627:7 <b>plans (2)</b> 565:14,17 <b>play (2)</b> 421:13;483:8 <b>played (4)</b> 590:14,20;591:1,8 <b>playing (1)</b> 586:19 <b>Plays (3)</b> 431:17;438:7;586:14 <b>plea (1)</b> 567:20 <b>pleading (1)</b> 628:18 <b>please (28)</b> 428:25;430:17; 435:13,13;437:11; 439:9;440:13;443:5; 479:5;506:5;523:17; 564:16;579:9;607:1; 629:15;631:19;632:21; 633:1,6;647:23; 655:25;660:25;663:3, 5;665:6;667:23; 668:17;671:10 <b>pleased (1)</b> 663:5 <b>plot (1)</b> 590:12 <b>plugged (1)</b> 609:12 <b>PM (1)</b> 563:2 <b>point (30)</b> 411:5;414:3;418:16; 419:10;424:15;428:7; 443:3;456:1,11;457:4; 462:19;464:18,20; 507:7;508:24;545:11; 554:11;555:22;561:3; 569:21;575:15,15; 576:9;581:2;585:2; 603:14;624:12;637:12; 639:20,22 <b>points (2)</b> 575:7;576:15 <b>police (1)</b> 538:24 <b>policy (3)</b> 487:19,20;658:16	<b>pool (18)</b> 410:6;418:23;419:9, 23;449:17;469:13,20; 472:4;497:5;516:14; 521:19;522:8,17; 604:15;605:22;606:3, 5;636:18 <b>poor (2)</b> 636:16;637:10 <b>portion (6)</b> 437:13;571:8; 611:14,15;625:11; 656:16 <b>portray (1)</b> 586:24 <b>position (3)</b> 488:5;489:25;572:1 <b>possibility (1)</b> 627:17 <b>possible (2)</b> 578:18;593:19 <b>potential (4)</b> 485:9;560:4;569:7; 673:13 <b>potentially (4)</b> 424:2;570:13; 627:20;675:16 <b>Pottinger (1)</b> 547:2 <b>pounds (1)</b> 613:15 <b>poverty (1)</b> 636:8 <b>practice (1)</b> 424:4 <b>practiced (1)</b> 536:16 <b>practices (3)</b> 654:8,10;657:18 <b>practicing (1)</b> 536:17 <b>precedent (1)</b> 489:10 <b>precise (2)</b> 463:14;622:19 <b>precisely (4)</b> 463:19;485:15; 510:4;623:9 <b>precluding (1)</b> 560:14 <b>predict (1)</b> 622:19 <b>prefer (2)</b> 481:20;624:20 <b>preference (3)</b> 422:14;423:16; 627:15 <b>preferred (1)</b> 423:7 <b>prep (1)</b> 536:9 <b>preparation (1)</b> 536:5	<b>preparations (1)</b> 536:8 <b>prepare (1)</b> 462:14 <b>prepared (3)</b> 423:25;427:23; 482:19 <b>presence (1)</b> 622:4 <b>present (34)</b> 408:1;428:14,15; 450:5,14;471:24; 476:24;477:3;480:17, 21;481:6;496:20; 500:13;501:5,15,21; 505:15;506:4;533:10; 559:14;579:10,11; 583:13;604:1;620:8; 621:11;629:14;644:20; 645:1,8,9;648:4;650:9; 671:13 <b>presently (1)</b> 434:2 <b>presided (1)</b> 463:13 <b>president (11)</b> 653:23,25;655:4,5,8; 656:6;661:4,21;662:6, 11;669:22 <b>president-elect (1)</b> 663:6 <b>press (11)</b> 539:19,23,25;540:4, 7;545:23;546:1,3,6,20; 547:25 <b>pretend (1)</b> 605:7 <b>pretty (4)</b> 504:1;524:23; 616:23,24 <b>preview (3)</b> 427:19;622:15; 674:19 <b>previous (2)</b> 620:22;667:16 <b>previously (4)</b> 429:6;436:9;472:16; 511:9 <b>pride (1)</b> 605:5 <b>primary (1)</b> 624:4 <b>Prince (1)</b> 530:21 <b>principal (2)</b> 585:14,17 <b>principles (2)</b> 417:6,13 <b>print (1)</b> 607:17 <b>printouts (2)</b> 426:8;427:3 <b>prior (48)</b>	410:16,20;415:2,3; 421:14;424:4;441:1; 455:19;456:11;460:16; 462:3,20;464:8,18; 465:15;567:2;568:20; 577:5,11,14;620:19; 621:16,18;622:9,10; 623:5,22,25;624:6; 625:6,22;626:13; 627:12,18;629:7; 635:19,19;636:24; 637:7,19;648:22; 649:5,10,11,18;655:16; 658:24;667:6 <b>privacy (2)</b> 408:7;630:12 <b>private (7)</b> 504:7;512:12;513:2, 6;531:11;536:23;589:6 <b>privilege (18)</b> 509:4;512:4;555:3; 561:19;564:24;565:5, 8,8,16,21;566:8; 570:13,22;571:22,25; 573:10;673:4;674:17 <b>Privileged (8)</b> 509:1;564:7;565:1,6, 19,19;567:21;609:23 <b>privy (1)</b> 576:8 <b>prize (1)</b> 441:13 <b>probably (4)</b> 488:8;575:12; 593:17;640:4 <b>problem (6)</b> 461:6,8;467:12; 585:6;621:22;625:12 <b>problems (1)</b> 411:1 <b>proceed (4)</b> 456:8;467:21;500:1; 600:18 <b>proceeding (3)</b> 427:24;486:9;566:11 <b>produce (1)</b> 669:7 <b>produced (1)</b> 553:17 <b>producers (1)</b> 553:17 <b>production (3)</b> 438:9,11,12 <b>productive (1)</b> 421:24 <b>Professional (9)</b> 434:3;521:5;587:21; 589:7;614:25;615:4,7; 634:16,18 <b>professions (2)</b> 589:8,9 <b>proffer (2)</b> 562:3;620:16	<b>program (9)</b> 486:7,21;535:17; 556:11;558:5,9; 659:17,23;670:19 <b>programming (4)</b> 653:13;658:6,6,7 <b>programs (1)</b> 653:9 <b>prohibit (1)</b> 627:1 <b>project (1)</b> 661:8 <b>promised (2)</b> 567:16;608:15 <b>prong (1)</b> 483:6 <b>proof (3)</b> 411:19;412:14,19 <b>proper (9)</b> 409:21;416:16,24; 418:4;460:7,9;462:10; 561:11;565:2 <b>proponent (1)</b> 561:1 <b>propose (2)</b> 423:19;570:23 <b>proposition (1)</b> 415:22 <b>prosecution (1)</b> 557:2 <b>prosecutions (1)</b> 487:20 <b>prosecutor (2)</b> 508:17;601:8 <b>prosecutors (3)</b> 527:21;572:7;602:11 <b>prospect (1)</b> 626:14 <b>prospects (2)</b> 567:13;654:17 <b>prostitute (1)</b> 591:1 <b>protect (4)</b> 408:6;629:6;630:12; 631:6 <b>protective (1)</b> 590:14 <b>prove (1)</b> 464:13 <b>provide (5)</b> 421:21;646:23; 669:9,10;674:16 <b>provided (8)</b> 421:22;425:20; 426:4,7;427:7;482:4; 506:1;661:24 <b>provides (1)</b> 662:15 <b>providing (2)</b> 656:7;661:5 <b>pseudonym (16)</b> 428:22;429:1; 436:16;440:6;555:9;
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628:15,18;629:6,11; 630:1,12;631:7; 659:14;660:21;671:21, 22 <b>pseudonyms (1)</b> 408:6 <b>public (3)</b> 641:11;644:1;661:15 <b>publicly (1)</b> 608:2 <b>publish (2)</b> 660:25;664:16 <b>pull (4)</b> 419:1;564:16; 637:15;648:9 <b>pulled (3)</b> 582:19;656:22;659:6 <b>pulling (3)</b> 582:21;583:9;660:11 <b>punctuality (1)</b> 428:17 <b>purchasing (1)</b> 654:2 <b>pure (1)</b> 414:2 <b>purely (1)</b> 640:22 <b>purpose (6)</b> 409:11,12;542:9; 572:6;589:3;623:22 <b>purposes (5)</b> 583:5,7;632:1,3; 633:13 <b>pursuant (1)</b> 428:24 <b>put (22)</b> 412:1,18;419:21; 433:3;443:20;445:20; 460:24;522:12;529:5; 571:1,14;590:7; 596:11;597:15;617:18; 628:23;633:18;636:14; 637:11;655:12;658:10; 669:6 <b>puts (2)</b> 560:19;619:19 <b>putting (4)</b> 412:3;554:11; 560:14;570:4	488:7,8 <b>quickly (3)</b> 425:24;427:24;430:9 <b>quite (7)</b> 427:17;536:2; 538:10;545:13;548:22; 577:3;603:13 <b>quote (1)</b> 487:19 <b>quoting (1)</b> 489:8	592:5,6;615:21,22 <b>reality (5)</b> 552:25;553:16,16, 18;592:3 <b>realize (1)</b> 549:21 <b>realized (1)</b> 594:5 <b>really (8)</b> 409:20;496:18; 519:23;535:18;549:17; 553:16;591:14;605:3 <b>reason (6)</b> 567:25;574:22; 575:2,5;595:17;598:22 <b>reasons (1)</b> 439:25 <b>rebirth (1)</b> 434:23 <b>recall (140)</b> 418:14,17;419:14; 444:11,14,17,20;445:4, 7;446:8,18;448:15; 449:22,24;450:2; 452:18,21;453:6; 454:3,25;457:4;460:5; 461:17;462:4,19,23,23; 463:1,6,9,11;468:4; 469:22,23,24,25;470:2, 12,23;471:6,18,22; 473:20;474:2;475:11, 13,15,18,19;476:1,4,8, 10,16,19;477:5,17; 478:3,8,11,12;479:9, 11;480:5,9;497:3,22; 498:11,14;499:11; 500:14;501:3,4,14; 502:2,6;503:19; 504:13,15;512:10,11, 14,16,19,20,21,22; 513:4,5,8,24;514:1,11, 14,19,21,22;515:7; 516:5,10,14;517:1; 518:4,19,22,25;520:11; 522:9,10;531:1,12,25; 532:12,18;534:20; 537:9;540:19;550:25; 551:19;552:19,20,22; 554:18;555:8;558:5; 582:21,24;583:1; 587:24;593:10;594:10; 595:10;597:13;606:7, 19;614:23;626:15; 627:1,17;648:17 <b>recalled (10)</b> 443:16;500:12; 501:20;510:17,19,21; 513:22;514:4;515:18; 524:12 <b>recalls (5)</b> 472:15;622:17,18; 648:4,5 <b>receivable (1)</b>	654:2 <b>received (24)</b> 436:19;439:25; 440:8;481:23;538:16; 543:5;559:23;560:8, 12,13;574:15;587:18; 599:10;600:4;618:23; 619:9,14;631:12; 642:7,12;657:15; 659:15;660:22;664:15 <b>recent (1)</b> 623:16 <b>recently (3)</b> 590:2;656:22;662:19 <b>Recess (5)</b> 424:24;496:3; 505:18;562:4;621:10 <b>recipient (1)</b> 441:12 <b>recognize (32)</b> 413:13;418:1; 427:16;435:19,20,22; 527:22;543:16;549:12, 19;550:7;558:21,23, 25;559:2;579:25; 584:11;585:3,12; 588:6,12;597:21; 598:21;600:11;615:6, 9;630:20;633:10; 656:3;658:19;660:5; 667:24 <b>recollection (62)</b> 413:11;414:1;460:7, 21;462:1,17,24;463:18, 19;468:20,22;474:6,8, 11;477:24;478:16; 479:17;480:2,3,16; 484:11,25;485:6,13,19, 23,24;486:4;499:14, 21;500:21,24;501:3; 508:4;509:24;510:6,8, 14;513:18;514:7,16; 515:1,13,22;520:13; 522:7;525:18;537:4, 24;541:10;543:24; 544:7;549:23;580:6, 10,15;583:8;584:7,20; 593:14;595:21;627:11 <b>recollections (1)</b> 531:11 <b>recommend (1)</b> 612:15 <b>recommendation (9)</b> 431:22;432:18; 433:11,14,17,25; 496:12;612:7,20 <b>recommenders (1)</b> 612:11 <b>reconsideration (1)</b> 486:10 <b>reconsidered (1)</b> 489:11 <b>record (20)</b>	414:16;420:16; 436:13;460:9;462:6, 14;465:21;482:24; 484:12;485:20;529:10, 12;559:24;583:23; 598:20;611:7;621:16; 658:15;660:13;665:9 <b>recorded (4)</b> 420:20,22;499:18; 506:18 <b>records (25)</b> 412:9,11;535:16,25; 538:8;654:13,16,19; 655:20;657:18;658:3, 10,12,14,15;659:16,19, 20,22,24,25;660:10,11; 669:11,13 <b>recover (1)</b> 576:13 <b>recovery (1)</b> 567:13 <b>recross (1)</b> 620:1 <b>recruit (1)</b> 519:15 <b>redacted (2)</b> 583:13;597:19 <b>redirect (5)</b> 579:4,5;600:6,8; 671:3 <b>redrafted (1)</b> 577:24 <b>refer (4)</b> 450:21;557:20; 623:15;633:13 <b>reference (4)</b> 435:1;436:16,22; 510:11 <b>referenced (3)</b> 418:8;467:3;496:12 <b>references (1)</b> 437:20 <b>referencing (1)</b> 422:18 <b>referral (1)</b> 609:24 <b>referred (4)</b> 433:16;521:5,8; 624:17 <b>referring (4)</b> 469:23;575:13; 632:3;651:16 <b>refers (3)</b> 567:9;574:21,22 <b>reflect (2)</b> 434:18;531:8 <b>refresh (42)</b> 460:21;462:24; 463:4,17,19;465:3; 468:22;474:8;480:2, 16;484:10,25;485:5,23, 23;499:14,21;500:24; 501:3;508:1,4;509:24;
<b>Q</b>				
<b>qualifications (1)</b> 433:17 <b>qualities (1)</b> 434:18 <b>Quarter (3)</b> 540:17,25;589:17 <b>quarters (1)</b> 605:6 <b>quash (1)</b> 490:10 <b>quick (2)</b>	<b>racecar (1)</b> 525:6 <b>raise (11)</b> 423:7;425:6,22; 426:23;428:5,6; 467:16;481:14,16,20; 555:3 <b>raised (14)</b> 415:16,19;422:3,9; 481:15;490:9,11; 575:8;581:19;626:14; 628:4;636:17,17; 673:22 <b>raises (1)</b> 577:5 <b>raising (1)</b> 621:6 <b>Ralph (1)</b> 535:8 <b>ran (2)</b> 591:3;665:17 <b>ranch (1)</b> 518:8 <b>range (1)</b> 592:1 <b>reaction (1)</b> 647:1 <b>read (26)</b> 409:2;434:12,14; 436:13;452:3;456:2; 462:13;464:16;465:20; 474:8;478:15,17; 479:16;482:23;484:11; 485:17,20;498:2; 499:18;545:23;546:1; 548:1,8,12,18;662:17 <b>reading (15)</b> 434:14;436:17; 450:7;452:1;456:5; 459:15;460:8;479:4; 506:19;508:3;513:14; 540:6;558:2;611:6; 628:2 <b>reads (1)</b> 488:12 <b>ready (3)</b> 413:24;414:12; 675:18 <b>real (4)</b>			

510:8;513:17;514:7; 16;515:12,22;520:13; 522:7;541:10;543:23; 544:7;549:23;580:6; 10,14;583:8;584:7; 588:4;593:14;595:21 <b>refreshed (3)</b> 514:25;584:20;593:5 <b>refreshes (14)</b> 460:6;462:16; 468:20;474:6,11; 477:24;478:15;479:17; 486:4;500:21;508:2; 510:4,5;537:4 <b>refreshing (5)</b> 414:24;462:1; 485:13,19;595:23 <b>refused (1)</b> 605:4 <b>regard (7)</b> 427:1;621:16;637:4; 649:3;669:3,6,19 <b>regarding (6)</b> 500:18;509:10; 514:18;648:12;654:11; 657:18 <b>regardless (2)</b> 534:4;598:15 <b>regards (1)</b> 661:8 <b>regularly (2)</b> 658:10,12 <b>rehearse (1)</b> 536:18 <b>rejected (1)</b> 489:13 <b>related (8)</b> 483:5;551:12;557:3, 14;561:10;649:6; 673:12,17 <b>relates (4)</b> 481:21;563:7; 665:24;671:21 <b>relating (4)</b> 470:23;481:23; 559:20;577:11 <b>relationship (18)</b> 534:5;581:17; 601:21;618:4;634:3,6, 14,16,18;635:5;636:9; 637:10;638:2;640:12; 647:11;651:18;654:25; 655:2 <b>relationships (2)</b> 458:10;635:8 <b>relative (1)</b> 548:24 <b>relayed (1)</b> 501:23 <b>relaying (2)</b> 502:8;627:24 <b>relevance (10)</b> 540:3;560:4;561:3; 569:15,17;570:15; 586:3;599:4;637:23; 646:10 <b>relevant (5)</b> 418:2;460:23;483:8; 486:25;489:4 <b>rely (1)</b> 625:14 <b>remain (2)</b> 414:21;627:19 <b>remaining (4)</b> 422:2;423:6;481:16; 675:10 <b>remains (2)</b> 409:3;485:12 <b>remarkable (1)</b> 663:8 <b>remember (124)</b> 413:21;443:19,22; 444:21;445:16;447:24; 448:4;451:6;453:13, 17;454:10,15;455:16; 457:5;459:8;460:13, 18,22;461:4,12,25; 462:6;463:16;464:19; 465:1,5,12;467:25; 469:19;475:5;480:8, 13,23,25;502:10; 503:5;508:7;510:2; 513:1;515:19;516:2,7, 9,20,23;518:7,17,20, 23;520:1,14,15,19,20, 23;521:8,20;522:22, 22;525:15;530:21,23; 531:3,17,22;532:2,4,8; 534:24;537:1;539:25; 540:6;548:5,7,8;549:8, 25;550:1,2,13,16,17, 23;551:3,4,21,24,25; 556:22;557:4;582:18; 585:14,14,15;588:23; 589:15;593:21;594:14; 595:4;596:3,13; 600:22;601:1,5,16; 604:7;605:1,2;606:24; 609:9,19;610:4; 611:10,13;612:8,12; 615:2,14;616:18; 617:3;618:10,24; 650:11,22 <b>remembered (9)</b> 455:15;475:16; 513:23;524:7;526:22; 527:10,13;530:18; 531:5 <b>remembering (1)</b> 460:20 <b>remembers (8)</b> 413:10;479:3;502:8; 512:25;585:1;617:13; 624:17,23 <b>remind (6)</b> 428:23,24;496:23; 577:4;579:15;671:9 <b>re-narrow (1)</b> 607:22 <b>rental (2)</b> 661:11,15 <b>rented (1)</b> 606:2 <b>repeat (5)</b> 447:16;451:7;477:1; 530:2;646:15 <b>repeated (5)</b> 504:12,14;507:6; 530:2;592:11 <b>repeatedly (2)</b> 452:22;649:6 <b>rephrase (4)</b> 479:5;546:10;607:6; 639:2 <b>rephrased (1)</b> 502:15 <b>replace (1)</b> 628:24 <b>re-place (1)</b> 424:15 <b>report (13)</b> 425:3;505:23; 538:10;542:7;582:14; 660:8,10;665:13,14,14, 14,17,20 <b>reported (2)</b> 450:13;502:20 <b>reporter (15)</b> 445:25;446:3; 447:13;606:20;607:2, 3,8,11;608:1,1,5,7,13, 16;609:8 <b>reporting (1)</b> 461:12 <b>reports (4)</b> 460:8;546:15;602:5; 665:12 <b>represent (2)</b> 547:4,10 <b>representative (2)</b> 560:6,7 <b>represented (1)</b> 614:13 <b>request (3)</b> 428:3;464:10;620:15 <b>require (1)</b> 428:4 <b>required (3)</b> 408:20;489:9;656:9 <b>research (1)</b> 571:21 <b>researching (1)</b> 571:23 <b>reserve (1)</b> 662:25 <b>reserved (2)</b> 414:20;662:24 <b>resolve (2)</b> 410:21;422:7 resolved (2) 574:7,14 respect (13) 450:9;482:3;498:1; 499:17;565:25;566:20; 574:1;575:19;576:22; 578:6,13;623:3;630:3 respond (2) 489:8;674:13 responded (1) 598:16 response (7) 484:19,20,20,21,23; 511:2;571:18 responsibilities (1) 653:24 rest (3) 418:11;674:11;675:4 restaurant (1) 591:3 rested (1) 626:23 resume (2) 496:21;505:25 resumed (2) 408:1;579:18 retainer (1) 541:11 retention (1) 658:16 return (1) 641:24 returning (1) 662:14 reveal (2) 608:2;609:1 revealed (2) 608:8;636:5 review (8) 419:15;425:21; 426:6;546:19;602:5; 629:2;658:24;674:9 reviewed (1) 656:13 revive (1) 579:1 ridiculous (1) 552:24 right (370) 408:2,17;409:15,24; 410:11,14;412:5; 413:8;414:8;415:14; 419:18,20;420:8,24; 423:5,22;424:20,25; 428:1;429:12;431:13, 15,17,19,23,24;432:2, 5,9,13;433:14,17,19, 22,24;434:6,24;435:2, 6;436:7;437:14,21,24; 438:3,5,7,24;439:5,21; 440:12,17,23;441:22; 442:7,8,12,14,17,21; 443:3,9,14,15,17,20,21, 22,23;444:3,4,7,10; 445:17;446:13,14; 448:1,2,10,19,23; 449:7,10,12;450:15,17; 451:12;453:9,11; 454:6,8,11,12,20,25; 455:1,2,16;456:15,16, 20,21;457:9,16;458:10, 11,17,22,23;459:1; 461:19,20;462:23; 463:22;465:4,23; 467:17;469:4,5,7,8,16; 470:19,20;471:8; 472:6,7;473:19,22,23; 475:5;477:7,9,10,14, 15,16;479:1;481:3; 486:2;489:19;496:17, 21;500:22;503:15; 504:9,16;505:9;506:5, 19;507:5,16,22; 509:16;511:13;513:16; 516:8;517:21,23; 518:2,10,14;519:13,22, 25;521:1,11,12;522:15, 16,25;523:2;524:15, 19;525:2,10,11,25; 526:8,15,17;527:3,11, 13,16,19,23;528:1,4; 530:21;531:12,23; 532:1,3,10,13;533:5, 11,13,20,23;534:6; 535:8,9,11,19;536:14, 24;537:10,12,18,20,22, 25;538:1,3,6,8,11,14, 15,21,25;539:1,3,4,5,8, 9,13,14,16,21;540:7, 13;542:2,4,5,7,9,11,14, 15,18,21,22,23;543:2, 21;544:4,10,13,14,16, 18,19;545:5,6,21,22; 546:13,25;547:4,12,14; 548:6,10,13,20;551:6; 552:4,5,11,13,16; 553:6,12,18,21;554:5, 7,9,12,17;555:7,11,15; 556:11,14;557:3,12,14, 15;558:9,18;561:21; 563:3;564:6,8;566:1; 567:6,7,14;571:7; 572:24;573:9,16; 577:17;578:2;580:25; 581:17,18,20,25;582:3, 8,12,15,16;585:7; 586:2,21;589:3,23; 590:9;591:19,22; 592:1,11,12,14;593:1, 6,23;594:11,15; 595:16;596:5,6,7,24; 598:6,7;612:3;615:11; 619:8;621:1;623:20; 628:4;632:6;635:21; 637:6,9,21;647:8; 649:11;650:23;652:3,
---



6;657:13;664:25; 665:23;666:15,22; 667:10;671:2,4; 673:15;674:10,14; 675:19 <b>right-hand (1)</b> 436:2 <b>rights (2)</b> 414:20;544:24 <b>ring (1)</b> 597:11 <b>road (2)</b> 609:11;674:21 <b>Robert (1)</b> 609:19 <b>Roberts (1)</b> 541:23 <b>Roberts' (1)</b> 546:24 <b>rocking (1)</b> 537:13 <b>ROHRBACH (45)</b> 408:15;409:5,7,20; 414:25;416:14;417:24; 418:10;421:16;626:20; 652:12,15,16,25;653:2; 655:25;656:24;657:2, 5,12,16;659:9;660:16, 25;661:17;662:3,8; 663:11;664:4,12,16,19, 24;665:4,7;666:3,16, 24;667:2;668:14; 671:2,3,15,16;674:13 <b>role (2)</b> 586:14;591:7 <b>romantic (2)</b> 634:2,5 <b>roof (1)</b> 554:11 <b>room (19)</b> 470:23;475:3,9; 478:10,22;479:7; 517:1;518:23;602:23; 603:15,19,22;604:3; 624:15;628:1;647:20; 648:5;657:23;661:16 <b>Rossmiller (1)</b> 508:18 <b>rough (1)</b> 647:12 <b>roughing (1)</b> 553:14 <b>routine (2)</b> 525:10;526:6 <b>Rule (42)</b> 408:3,9,21;409:13; 411:5,8,10,16;412:16; 413:7;414:17;415:16, 17,21;416:7,11,18,20; 417:16;418:6;425:23; 452:4;464:6,16; 481:22;482:3,13; 483:7,9;484:13;	486:25;487:19;488:14, 15,17;489:3,15;490:6; 568:21;577:23;623:7; 637:20 <b>rules (2)</b> 415:3;620:15 <b>ruling (6)</b> 436:15;440:2,5; 622:13;659:13;660:20 <b>running (1)</b> 616:2 <b>S</b> <b>safety (1)</b> 654:3 <b>sake (1)</b> 436:22 <b>Salesforce (5)</b> 655:14,17;660:8; 665:12,13 <b>same (40)</b> 412:11,14;413:2; 420:17;435:25;439:2, 25;441:1,17;454:4,5; 455:22;456:6;457:13, 14;468:19;486:9,18; 501:16;504:12;505:3; 514:3;515:8,9,13; 578:6,13;584:13,21; 614:5,8;634:20; 639:21,23;666:8; 667:6,22;668:8; 671:10;675:3 <b>samples (1)</b> 427:7 <b>sampling (1)</b> 426:6 <b>sang (1)</b> 595:1 <b>sat (4)</b> 449:17;460:14; 468:16;469:1 <b>satisfied (1)</b> 409:10 <b>satisfy (1)</b> 409:21 <b>saver (1)</b> 422:19 <b>saw (27)</b> 433:23;469:9,18,20, 21,25;470:4,10;476:11, 14,17,20;519:1,7; 527:23;530:15;533:19, 23;539:2,23;540:2,4; 594:5;647:13;650:4; 651:11;656:22 <b>saying (34)</b> 409:2;417:10; 419:23;461:17;462:15; 464:25;465:4;506:18; 508:7;512:22;513:4; 514:11,14;516:10;	518:19;520:15;522:9, 22;532:22;584:25; 593:22;596:13;630:20; 633:10;636:24;648:5; 650:11;658:19;660:7; 665:16;666:10;667:14; 668:1,4 <b>scared (2)</b> 608:21;609:3 <b>scenario (9)</b> 465:18;470:21; 471:6,20;482:22; 484:8;485:9;526:5; 565:3 <b>scenarios (1)</b> 461:22 <b>schedule (1)</b> 671:10 <b>scholarship (12)</b> 441:12;656:8;661:6, 6,9,9,11,23;662:14; 663:20;664:3,9 <b>scholarship/financial (1)</b> 430:25 <b>scholarships (4)</b> 429:17;447:23; 448:3;450:17 <b>school (54)</b> 431:12;433:21; 434:3,5,21,22;437:24; 440:17;442:4,11; 448:19,19,22;456:24; 457:9,16,17,17,18; 458:5;521:5;582:10, 18;585:17;587:4,8,20; 589:4,5,5,6,6,7,10,11, 15,16,17,21;596:12; 604:6,7,19,22;605:17, 20;606:9;612:21; 614:25;615:4,7;632:9, 10;653:10 <b>scope (8)</b> 422:1;425:4;482:24; 483:1,7;485:19; 489:15;617:10 <b>score (1)</b> 565:3 <b>screen (4)</b> 433:3;445:20;447:6; 468:11 <b>scrounge (1)</b> 605:6 <b>se (1)</b> 435:20 <b>seal (20)</b> 436:12,15;439:25; 440:2,5;559:5;610:13; 613:23;628:14;629:1, 4;631:3,6,13;632:23; 633:3;659:10,12; 660:17,19 <b>sealed (5)</b> 424:2;490:17;	671:24;673:1,3 <b>season (1)</b> 663:9 <b>Seasons (1)</b> 553:15 <b>seated (8)</b> 481:9;505:16;506:5; 559:15;620:9;629:16; 652:20;671:14 <b>seats (3)</b> 510:19,22;629:15 <b>second (59)</b> 418:17,19;419:11, 16;425:10;431:5,6; 436:21;441:5,24; 448:16;452:8;456:7; 477:23;479:14,20; 481:22;483:6;486:6; 488:12,15,21,22;489:8, 10,12,16;497:23,24; 498:16;500:16,17,17, 18;501:7,8,9,11,19; 508:3;512:15;514:15; 520:12;522:6;532:15; 544:18;550:4;570:21; 572:11;583:7;585:8; 593:12,13,16;605:25; 611:8,9;627:12;633:23 <b>secret (1)</b> 569:23 <b>secrets (1)</b> 602:24 <b>section (9)</b> 545:15,16;611:9,16; 612:24;614:6;665:12; 666:12;668:5 <b>security (1)</b> 654:3 <b>seeing (2)</b> 510:17;565:23 <b>seek (2)</b> 487:6;577:13 <b>seeking (6)</b> 488:10,13;589:8; 619:11;673:23,25 <b>seem (1)</b> 413:21 <b>seems (3)</b> 544:10;570:13; 637:25 <b>selected (1)</b> 544:21 <b>send (1)</b> 537:17 <b>sending (2)</b> 537:9;589:10 <b>senior (10)</b> 434:6;587:20,22,23; 588:18,24;589:1,13,22; 596:9 <b>sense (5)</b> 428:9;537:7;578:19; 593:17;674:21	<b>sent (4)</b> 414:17;555:25; 556:4;663:4 <b>sentence (17)</b> 421:3,4;456:7; 459:17;474:8;478:14; 479:15;480:15;500:18; 501:8,11;508:3;514:3; 515:12;520:15;565:12; 567:16 <b>sentimental (1)</b> 590:8 <b>Separate (2)</b> 489:17;566:6 <b>separately (1)</b> 565:16 <b>September (19)</b> 446:7;447:8;451:21, 23;498:16;499:2; 503:8;504:9;506:12, 21;527:25;528:3; 530:4;540:22;543:14; 544:2,10;554:20; 653:10 <b>sequence (1)</b> 499:20 <b>serial (1)</b> 590:24 <b>series (1)</b> 591:21 <b>services (1)</b> 654:4 <b>sessions (2)</b> 536:5,9 <b>set (4)</b> 426:25;468:8; 531:23;559:11 <b>setting (2)</b> 417:25;475:17 <b>settings (1)</b> 488:19 <b>settle (1)</b> 483:23 <b>settled (1)</b> 559:23 <b>settlement (10)</b> 486:22;487:6; 488:10,17;559:21; 560:1,5,8,11;561:10 <b>settlements (3)</b> 483:5;487:21;574:15 <b>Seventh (1)</b> 613:18 <b>several (2)</b> 414:17;444:4 <b>sex (7)</b> 476:5,12;480:11,17, 21;540:1;613:1 <b>sexual (16)</b> 469:6;476:21,24; 477:3,7;519:18;525:8; 526:17;527:6;598:11, 13,13,13,14,14;649:19
--	--	---	---	--

<b>sexualized (3)</b> 522:24;524:13; 526:19	<b>Side (3)</b> 517:8;595:16;609:11	<b>slave (1)</b> 540:2	551:22;568:16;575:6; 577:8;579:1;598:3; 606:6;607:5;613:2,8; 615:1;619:7;628:10; 641:21;670:3	444:6;445:1,11; 446:6,12;449:23; 459:10;469:9;470:25; 471:8;472:8;475:7,22; 499:2;541:25;608:1,5; 637:2
<b>sexually (4)</b> 534:5;557:25;617:3, 24	<b>sidebar (23)</b> 422:10,14,18;423:8, 11,13,14;425:6; 459:13;460:1,3; 481:20;490:15;529:1; 555:1;561:21;584:24; 636:1;647:23;648:2; 671:20,22;673:1	<b>sleep (1)</b> 639:23	<b>sort (9)</b> 417:5;541:20;561:9; 605:5;616:1;618:3; 619:11;655:12;658:2	<b>spoken (4)</b> 458:6;546:12;547:6, 9
<b>shameful (1)</b> 602:24	<b>sidebars (1)</b> 428:2	<b>sleeping (1)</b> 639:21	<b>sorts (2)</b> 654:16;663:16	<b>sponte (1)</b> 625:13
<b>shams (1)</b> 663:18	<b>sides (1)</b> 626:22	<b>slightly (1)</b> 567:8	<b>sounds (3)</b> 565:13;572:18;626:8	<b>spreadsheet (1)</b> 660:14
<b>share (4)</b> 414:19;511:19,24; 603:1	<b>sign (1)</b> 556:19	<b>small (5)</b> 592:17;639:20,22; 661:11;667:22	<b>source (2)</b> 445:8,11	<b>spring (2)</b> 606:5,6
<b>shared (2)</b> 554:25;564:2	<b>signature (8)</b> 432:2;435:22; 436:22;439:13;440:15; 556:21;557:6;559:2	<b>snacks (1)</b> 620:6	<b>southwest (1)</b> 653:17	<b>squared (1)</b> 496:9
<b>sharing (1)</b> 603:7	<b>signed (5)</b> 442:21;557:22,23; 596:21;597:25	<b>soap (3)</b> 538:14;589:25;590:5	<b>speak (8)</b> 484:14;542:18; 561:22;565:9;571:22; 581:13;607:11;608:2	<b>St (1)</b> 412:24
<b>sheets (1)</b> 663:18	<b>significant (2)</b> 591:11;618:3	<b>software (3)</b> 655:15;659:24;660:8	<b>speaker (1)</b> 522:12	<b>staff (3)</b> 533:10,13;662:13
<b>shopping (1)</b> 457:19	<b>significantly (1)</b> 592:7	<b>sole (1)</b> 623:22	<b>speaking (3)</b> 449:24;540:19;572:5	<b>staircase (1)</b> 516:23
<b>short (3)</b> 526:24;545:15,15	<b>similar (4)</b> 424:1,1;576:21; 621:18	<b>solely (1)</b> 475:16	<b>special (1)</b> 592:2	<b>stake (2)</b> 574:13;619:21
<b>shorten (1)</b> 675:16	<b>singing (4)</b> 438:5;587:7,13,15	<b>solicited (1)</b> 433:24	<b>specialist (1)</b> 545:2	<b>stakes (1)</b> 487:24
<b>shortly (3)</b> 469:12;472:4;641:19	<b>single (1)</b> 413:17	<b>somebody (3)</b> 499:19;550:9;652:15	<b>specializes (1)</b> 544:23	<b>stalked (1)</b> 590:24
<b>show (43)</b> 408:23,23;414:1; 417:18;435:8;440:25; 460:16;462:16;463:17, 24;464:9,10,12; 465:13;468:10;483:6; 486:3;504:2;506:16; 510:15,16,17;511:11; 552:25;553:10,14,18; 579:23;580:13;583:4, 6,11,16;587:25;590:4; 592:3;594:5;597:18; 608:24;632:13,16; 634:20;665:20	<b>sister (6)</b> 456:15;457:11,13, 14;554:1;606:1	<b>somehow (1)</b> 409:18	<b>specials (1)</b> 592:1	<b>stamps (1)</b> 605:4
<b>showed (2)</b> 534:17;602:8	<b>sisters (5)</b> 456:17,25;457:19; 458:2,7	<b>someone (10)</b> 448:22,25;525:17; 531:22;564:3;566:5; 567:15;586:24;607:21; 644:20	<b>specific (31)</b> 415:1;418:18; 421:19;422:18;461:11; 470:2;471:1,5,9,14; 472:17,24;473:1,10; 474:22;513:24;514:4, 22;515:18;516:3; 523:13,19;574:24; 628:14;635:15;641:22; 642:2,19;643:18,18; 674:18	<b>Stan (1)</b> 547:2
<b>showing (7)</b> 419:22;460:5;464:7; 465:20;529:6;583:24, 25	<b>sit (11)</b> 411:8;459:3,6;465:1, 11;468:3;469:3;479:6; 513:1,5;548:3	<b>sometime (1)</b> 636:13	<b>specifically (11)</b> 441:14;489:6; 500:12;516:7;571:1; 622:17;636:23;638:5; 642:23;645:22;660:11	<b>stand (18)</b> 408:20;413:23,23; 414:4;415:11,22; 416:7;418:4;424:15, 16;570:4,7;573:6; 592:11;601:9;618:2; 630:15;637:2
<b>shown (6)</b> 412:23;482:23; 484:10;528:4;530:5; 615:2	<b>sitting (13)</b> 428:9;443:12;448:9, 13;450:1;469:7; 489:12;510:19;512:13; 513:23;602:23;603:12; 628:1	<b>Sometimes (6)</b> 459:1;527:3;605:6; 622:22,23;645:9	<b>specifics (1)</b> 606:14	<b>standing (2)</b> 447:25;652:18
<b>shows (3)</b> 553:16;591:21; 665:22	<b>situation (2)</b> 604:6;636:8	<b>somewhat (2)</b> 512:18;570:3	<b>specify (1)</b> 472:13	<b>start (5)</b> 481:2;487:14; 545:16;564:1;673:21
<b>sibling (2)</b> 551:5,12	<b>situations (2)</b> 590:6,9	<b>somewhere (2)</b> 585:2;587:22	<b>spend (1)</b> 560:9	<b>started (12)</b> 448:19;517:10; 518:2;539:19;574:9; 579:23;592:19;603:18, 21,23;640:4;644:14
<b>siblings (4)</b> 613:6;635:8;669:13, 17	<b>sketch (4)</b> 428:24,25;629:10; 630:3	<b>soon (4)</b> 425:7,13;435:17; 481:18	<b>spent (4)</b> 451:5,9;638:5; 639:11	<b>starting (1)</b> 603:12
<b>sick (1)</b> 639:10	<b>skip (1)</b> 579:20	<b>Sophie (8)</b> 524:12;525:15,17, 25;526:1,4;528:4; 530:5	<b>spin (1)</b> 484:16	<b>starts (1)</b> 613:1
<b>sickness (1)</b> 505:20	<b>skipping (1)</b> 589:21	<b>sophisticated (1)</b> 560:11	<b>split (1)</b> 412:1	<b>state (10)</b> 409:6;411:12; 421:13;441:13;449:14; 509:17;547:23;552:15; 587:10;621:15
	<b>skits (1)</b> 438:7	<b>sorry (48)</b> 411:3;419:5,19; 420:24;430:3;434:2; 440:3;442:15;444:8; 451:7;453:22;455:10; 458:6;468:6,7,12; 469:17,24;477:1; 498:20;500:16;504:22; 510:7,12;514:16; 520:7;523:22;540:22; 546:18;549:15,17,18;	<b>spoke (18)</b>	<b>stated (3)</b> 514:5;607:20;636:12
				<b>statement (71)</b> 409:8;410:16,16,20,

20;415:2,3;416:5; 417:2;420:5,18,20; 421:14;450:8,9; 452:12;460:16;462:3, 20,22;463:6;464:7,9, 14,18,19;465:2,7,8,16, 21,25;479:3;480:9; 486:14;487:8;489:1; 498:3,15,18,22;502:3; 515:2,4;522:2,4; 523:14;541:20;565:15, 18;568:18,20;569:2; 577:14;606:22;622:10; 623:6,23;624:6;625:7, 22;635:19,19;637:20; 642:18;645:12;648:22, 24;649:5,11,18 <b>statements (24)</b> 420:22;421:6;444:3; 461:13;483:17;485:21; 498:23;506:19;515:7; 542:4;577:6,11; 620:20;621:17,19,24; 622:7,11,14;626:14; 627:13,18;644:4; 649:10 <b>state-of-play (1)</b> 627:9 <b>States (1)</b> 487:15 <b>status (3)</b> 421:21;626:16;629:4 <b>statute (1)</b> 463:21 <b>stay (6)</b> 457:2;608:23; 625:23;661:13,15,16 <b>stayed (3)</b> 517:15,18,21 <b>staying (5)</b> 457:5;517:10;518:2; 533:19;663:7 <b>step (7)</b> 424:20;481:8;569:4; 620:2;635:2;652:8; 671:5 <b>steps (1)</b> 529:7 <b>STERNHEIM (77)</b> 466:1;506:2;577:13, 17;620:12,23;621:1,5, 8,14;622:16;623:8,14, 19;625:10,12,17,24; 626:10;631:4,16,17; 633:4,5;635:14,16,23; 636:3,11,17;637:1,7, 15,25;638:7;642:16; 643:21;644:9;645:10; 646:8,10;647:22,25; 648:10,17,20;649:3,9, 13;651:22;652:4,5; 657:6,10;659:11; 660:18;664:13;665:1,	2;666:6,7,20,21; 667:20,21;668:16,17, 20,22,25;669:5;670:22, 25;671:18;673:7,9; 675:8 <b>sticker (1)</b> 628:24 <b>still (7)</b> 409:1;419:3;457:9; 463:11;565:11;604:14, 16 <b>stop (5)</b> 540:7;541:18,19; 548:12,16 <b>stopped (1)</b> 538:5 <b>stopping (1)</b> 545:11 <b>storage (1)</b> 663:3 <b>stored (1)</b> 656:18 <b>stories (1)</b> 545:23 <b>story (11)</b> 461:5,9;474:21; 497:14;503:5;504:12, 14;526:8;531:20; 641:1,2 <b>storyline (1)</b> 591:2 <b>strangers (1)</b> 602:23 <b>streamline (1)</b> 460:3 <b>street (4)</b> 409:1;410:23,24,24 <b>stretching (1)</b> 652:18 <b>strike (2)</b> 625:6,19 <b>strong (7)</b> 434:18;435:5; 616:21,23,24;617:14; 637:12 <b>structure (1)</b> 442:16 <b>structures (1)</b> 412:25 <b>struggle (1)</b> 604:18 <b>struggles (1)</b> 635:9 <b>stuck (1)</b> 505:24 <b>student (17)</b> 441:11;503:20; 504:1;657:18,20,25; 658:1,1,2,3,9,10,14; 659:16,23;660:9;669:8 <b>students (1)</b> 661:12 <b>student's (1)</b>	658:5 <b>studio (1)</b> 535:21 <b>stuff (3)</b> 427:23;548:18; 605:17 <b>sua (1)</b> 625:13 <b>subject (5)</b> 409:13;571:10; 626:13;636:4;637:4 <b>submitted (4)</b> 432:7;437:1;438:23; 556:24 <b>subpoena (1)</b> 673:18 <b>subsequent (1)</b> 489:10 <b>subsequently (1)</b> 488:14 <b>substance (1)</b> 486:24 <b>substantial (3)</b> 579:4;627:24;675:2 <b>substantiated (1)</b> 623:22 <b>substantive (1)</b> 627:8 <b>substantively (1)</b> 675:13 <b>sudden (1)</b> 469:16 <b>sued (4)</b> 555:15,17;583:8; 585:16 <b>suffered (1)</b> 410:25 <b>suffering (1)</b> 619:14 <b>sufficient (2)</b> 486:20;487:21 <b>sufficiently (1)</b> 488:21 <b>sugar (1)</b> 579:1 <b>suggest (1)</b> 624:21 <b>suggested (3)</b> 417:19;458:9;511:15 <b>suggesting (3)</b> 572:8;575:22;576:3 <b>suggestion (1)</b> 505:4 <b>suit (1)</b> 535:11 <b>sum (1)</b> 559:24 <b>summary (1)</b> 438:1 <b>summer (47)</b> 429:24;430:2;436:5; 437:3;438:24;439:1,3, 19;440:20;442:17,19;	448:17;592:17;593:8, 18,23,24;594:1,2; 604:10,14,16;610:25; 613:12,13;614:16; 616:6,7,8,10,10,13,13, 16,18,22;653:10; 658:22;665:24,25; 667:11,12,16,16;668:3; 670:7,19 <b>summers (2)</b> 429:20;605:18 <b>sums (1)</b> 483:14 <b>supplant (1)</b> 624:4 <b>support (3)</b> 434:8;554:3;637:16 <b>supported (2)</b> 441:1;553:20 <b>suppose (5)</b> 484:19;547:8;568:7, 10;573:11 <b>supposed (1)</b> 459:3 <b>Supreme (1)</b> 489:13 <b>sure (44)</b> 410:19;411:10,21; 417:17;418:12;425:12; 427:17;454:1;463:23; 473:6;475:10,12,14,24; 476:2;478:10,23,25; 479:6;480:3;482:20; 483:10;485:14;488:23; 496:18;514:5;523:18; 533:9;568:20;572:1,3; 575:23;577:3;595:3; 608:8;609:1;620:14; 622:9;626:15;628:3, 19;637:6;670:11; 674:15 <b>surprised (1)</b> 628:4 <b>survive (1)</b> 639:12 <b>suspect (1)</b> 675:9 <b>sustain (5)</b> 450:9;472:12;499:1; 500:7;642:17 <b>sustained (37)</b> 417:14;464:3;470:8; 471:4;472:2;475:1; 498:19;500:5,7; 501:13,17;503:4; 508:13;509:2,6,8; 511:18,22;512:2,6; 515:21;522:5;532:21; 543:9;554:24;555:4; 556:3,16;558:4; 595:20,23;609:6; 618:15;619:4;643:9; 645:11;651:23	<b>swapped (1)</b> 408:16 <b>sweater (1)</b> 535:8 <b>sweet (2)</b> 452:23;453:1 <b>switching (1)</b> 512:24 <b>sworn (3)</b> 429:6;629:24;652:23 <hr/> <b>T</b> <hr/> <b>tab (1)</b> 424:5 <b>table (3)</b> 443:12,20;518:4 <b>tabloid (3)</b> 427:4,15;606:23 <b>tabloids (2)</b> 548:17,18 <b>talent (1)</b> 434:17 <b>talented (1)</b> 611:25 <b>talk (15)</b> 411:14;421:12; 443:6;448:16;476:9; 601:22;602:19;618:5; 628:6,7;634:24;636:3; 639:6;640:20;654:21 <b>talked (29)</b> 438:3;440:22; 452:22;457:24;458:2, 15;497:16;498:8; 510:5;512:7;522:24; 523:4;526:10;538:11; 546:3,6,24;547:2,12, 14;548:1,5,7;553:14; 554:21;592:3;594:4; 606:20;612:11 <b>talking (26)</b> 408:18;411:6; 412:17;413:9;414:21; 441:21;444:21;461:21; 462:1;467:24;472:14; 489:1,3;500:11;505:4; 506:12;527:19;536:11; 565:12;580:17;600:10; 610:23;623:1;633:19; 649:10;658:9 <b>tall (5)</b> 443:12;524:19; 613:12;614:9,17 <b>tan (1)</b> 524:25 <b>tangled (1)</b> 590:5 <b>tea (5)</b> 449:16;450:2,10,14; 451:1 <b>teacher (9)</b> 437:23;441:1;
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582:19,21;583:2,8; 584:9,11;585:14 <b>teachers (1)</b> 612:21 <b>technicality (1)</b> 592:17 <b>Technicolor (1)</b> 438:10 <b>techniques (1)</b> 529:6 <b>tee (1)</b> 577:11 <b>teed (1)</b> 620:13 <b>Teen (1)</b> 552:9 <b>teenage (1)</b> 548:22 <b>teenager (2)</b> 418:16;587:6 <b>television (4)</b> 615:17,21;632:13,15 <b>telling (13)</b> 479:9;512:11,17; 518:17,20;522:10; 558:5;573:5;582:7,21; 602:24;622:18;646:20 <b>temporal (1)</b> 412:1 <b>ten (4)</b> 456:20;463:13; 580:19;621:9 <b>ten-minute (1)</b> 481:4 <b>term (5)</b> 575:18;624:1,8,20; 670:5 <b>terms (10)</b> 408:4;421:13;484:6; 488:18;559:20;560:1, 5;561:13;574:16; 626:16 <b>testified (42)</b> 408:19;410:4; 412:23,25;415:11; 416:6;429:6;443:11, 25;447:22;448:9,21; 451:4,8;453:7;460:5, 11;463:14;464:23; 472:4;475:2;497:2; 510:1;516:6,11; 523:25;537:17;538:4; 561:5;566:16;574:12; 581:12,16,19;607:19; 629:24;636:18;637:22; 647:7;648:12;652:23; 665:8 <b>testifies (1)</b> 413:18 <b>testify (22)</b> 408:6;436:16;440:6; 482:18,24;487:13; 563:22,24;569:25;	580:18;620:19;624:4, 6,8;625:20;628:15; 629:6;631:7;636:25; 638:1;659:13;660:20 <b>testifying (33)</b> 428:21;429:1; 455:24;536:11;566:19; 567:5,6;569:21;570:1, 6,8,11,18;572:21; 574:4,17,22;575:11; 576:5,12;578:4;581:3, 4,9;584:16;615:18,21; 626:21;629:11;630:1, 10,13;674:2 <b>testimony (47)</b> 409:25;410:10; 411:2,23;412:4;415:4; 417:20;451:6,18; 453:5,17;465:16; 478:11;486:24;497:3; 523:7,10,13;524:2; 536:18;561:12;563:8; 571:2;574:11;620:14; 622:2,3,4,19,25; 623:16,24;624:3,11,15, 19,21;625:6,19,25; 627:2,25;635:17; 636:4;648:10;649:2; 674:9 <b>thanking (1)</b> 661:22 <b>Thanks (1)</b> 537:13 <b>theater (6)</b> 458:19;459:4,6; 469:6;503:20;653:12 <b>theaters (2)</b> 458:24;468:3 <b>then-pending (1)</b> 576:13 <b>theories (1)</b> 409:10 <b>theory (6)</b> 409:16,20;416:24; 461:2;623:21;674:1 <b>therapist (1)</b> 524:15 <b>thereafter (2)</b> 452:22;542:23 <b>therefore (1)</b> 409:13 <b>thin (2)</b> 443:12;524:19 <b>Thinking (2)</b> 427:14;674:23 <b>third (14)</b> 422:22;434:12,15; 504:22,23;506:16; 515:9,13,16,24;526:10; 666:12;668:5;675:4 <b>though (4)</b> 419:3;507:6;587:13; 595:10	<b>thought (9)</b> 433:1;519:4,13; 527:15,22;549:17; 564:22;594:2,4 <b>thousand (2)</b> 461:6;640:25 <b>thread (1)</b> 515:25 <b>threaten (1)</b> 608:2 <b>threats (1)</b> 598:14 <b>three (14)</b> 419:3;422:21; 423:12;429:20;434:18; 442:23;450:1;453:5,9; 471:21;497:11;639:20, 23;669:17 <b>three-bedroom (3)</b> 421:5;606:1,4 <b>three-quarters (1)</b> 579:24 <b>threshold (1)</b> 574:2 <b>throat (1)</b> 505:24 <b>throughout (1)</b> 552:3 <b>thus (1)</b> 487:1 <b>till (6)</b> 433:23;435:13,14; 589:14;634:7,11 <b>Tim (1)</b> 662:6 <b>timeline (7)</b> 420:6;455:5;503:14; 504:8;510:11;522:23; 533:1 <b>timelines (1)</b> 661:25 <b>times (25)</b> 453:4,6;455:12; 460:4;461:6;475:2,5,8; 478:21;485:16;503:5; 507:6,15;536:2; 580:19;587:6;592:11; 596:24;601:23,25; 602:11;618:6,10; 634:24;639:6 <b>timing (6)</b> 577:4;578:19,19; 626:18;673:4;674:23 <b>tired (2)</b> 606:6;616:3 <b>title (3)</b> 653:22,23;665:14 <b>today (25)</b> 420:13;455:16; 464:2;479:6;513:1,5; 516:9;528:3;530:4; 548:3;571:16;574:4; 588:5;615:23;627:5,	17;629:3;630:10,13; 633:17;656:13;658:24; 673:16,22;675:4 <b>today's (3)</b> 632:1,3;633:13 <b>toe-to-toe (1)</b> 648:13 <b>together (8)</b> 458:17;478:10; 546:15,17,19,23;634:8, 10 <b>told (135)</b> 444:12,15,18;445:2, 11,25;446:15;447:2,8, 21,22;450:16;451:20, 23;452:19;453:19,25; 455:6;456:10;462:5; 465:1,11;468:2,15,22, 25;469:3;471:1,9,13; 472:16,23;473:24; 474:11;475:23;476:2, 5,8,11,14,17,20,23; 477:2,6;478:8,18; 480:2,6,10,11,24; 497:17;498:9,12; 499:8,15,21;500:2; 503:9,12;504:9;505:7; 506:13;507:9,15,19; 508:4;511:9;512:8,20; 513:11,18,21;514:12, 18;515:16,23;516:2; 519:4;520:2,8,16; 522:11,14;524:10; 525:22;527:18,21; 531:5;532:12;541:10; 554:15,18;558:11; 564:5;567:1,8;568:8, 11,15,22;569:12,18; 571:4;572:20,22,22; 573:3,7;582:2,11; 592:14;593:5;594:20; 601:13;611:11;622:5; 624:7;625:20;639:10, 24;641:6,19;642:10,11, 24;643:11;645:9,16; 650:13,21;651:1,17; 674:1 <b>tomorrow (2)</b> 671:10,12 <b>took (16)</b> 457:19,22;515:17; 516:4;521:11,15; 522:10,14;536:23; 538:10;550:24;551:3, 19;578:22;591:5;602:3 <b>top (19)</b> 430:24;437:5,13,20; 441:5;468:12,13; 469:20;470:16,16; 514:15;515:11;523:14, 20;612:24;613:4,4; 633:9;665:15 <b>topic (9)</b>	423:6;523:19; 573:20;602:15;618:21; 635:3,3;640:21,24 <b>topics (8)</b> 421:23,25;422:2,3; 423:2;573:21;601:23, 25 <b>topless (1)</b> 470:2 <b>totally (1)</b> 567:23 <b>touch (4)</b> 617:18;627:6,16; 634:12 <b>touched (7)</b> 442:15;475:24; 479:10;480:4;617:5,8, 20 <b>touching (2)</b> 475:19;598:16 <b>tough (1)</b> 540:13 <b>touring (1)</b> 438:13 <b>touts (1)</b> 543:4 <b>towards (2)</b> 549:22;611:10 <b>towels (1)</b> 663:17 <b>town (1)</b> 653:18 <b>toys (1)</b> 476:5 <b>track (2)</b> 655:13,15 <b>tracked (1)</b> 659:5 <b>tracks (2)</b> 568:19;623:7 <b>trafficked (1)</b> 557:25 <b>trained (1)</b> 591:19 <b>transcript (4)</b> 506:18;513:14; 523:12;629:3 <b>translate (1)</b> 550:10 <b>transparent (1)</b> 627:8 <b>Trapp (2)</b> 434:23,24 <b>travel (10)</b> 506:7;531:23; 536:20;550:7;551:8, 10;552:3;580:9; 606:16;627:5 <b>traveled (9)</b> 456:24;457:2,11; 502:21;548:22,25; 579:21;587:8;606:8 <b>traveling (3)</b>
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442:9;498:9;512:7 <b>Traverse (1)</b> 653:18 <b>treatment (1)</b> 590:8 <b>treatments (1)</b> 639:12 <b>tree (1)</b> 572:16 <b>Trial (22)</b> 408:1;463:12;536:5, 9;563:22,25;566:6; 567:7;571:25;574:4, 11,18;576:12;601:9, 13;603:25;619:22; 626:22;627:23,24; 674:25;675:5 <b>tried (3)</b> 463:24;464:2;609:17 <b>trip (29)</b> 498:10,12;499:9,15, 22;500:3;503:17; 504:2,7;507:1,20,21; 508:10,11;512:8; 513:19,22;518:18,21; 550:11,24;551:3,4,12, 19,24,25;580:6;606:18 <b>trips (8)</b> 515:17,25;516:3; 549:7,23;550:1;551:6; 606:11 <b>trouble (3)</b> 504:19;581:20;582:5 <b>true (40)</b> 409:22;414:25; 444:12,15,18;455:21; 461:15;462:5;463:10; 468:2;471:13;474:11; 475:19,21;480:6,20; 487:8;497:17,20; 499:10;500:2;508:9; 510:13;513:21;514:10, 18;515:16,23;516:2; 520:16;536:22;556:24; 560:22;584:18;595:24; 628:16;630:25;631:22; 636:14;670:8 <b>Trump (4)</b> 521:9,17;522:15; 552:13 <b>trust (1)</b> 603:12 <b>truth (3)</b> 601:12;607:20; 615:22 <b>truthfulness (1)</b> 409:14 <b>try (10)</b> 413:25;420:6;428:2; 485:22;548:11;555:2; 585:4;619:13,15,16 <b>trying (14)</b> 411:18,19;412:18;	415:9;417:17;427:22; 428:8;455:17;464:24; 465:8;541:19;545:14; 568:16,17 <b>turn (36)</b> 426:22;430:2,7,17; 431:5;432:13;435:8, 10;436:21;437:19; 441:4;453:20;459:9; 480:9;507:5;598:8; 610:15,20;611:8; 612:23;613:20,22; 632:7;633:1;658:17; 660:3;661:17;662:8; 663:11;664:20;666:4, 8,17;667:18,22;673:7 <b>turned (5)</b> 429:24;432:9;593:7, 18,20 <b>turning (3)</b> 514:5;659:1;662:3 <b>turns (1)</b> 426:21 <b>TV (3)</b> 591:21;608:24; 634:20 <b>Twenty-something (1)</b> 590:4 <b>twice (1)</b> 511:9 <b>two (50)</b> 409:22;421:6;422:2, 6,9,21;423:2,12;425:4, 23;435:1,5;449:24,24; 453:2,5,9;454:10,13; 455:3,12,13,15;456:17; 460:23;461:22;473:12; 474:1,12,23;481:11,14; 482:8;483:13;516:7; 523:5;524:2;544:3; 570:10;575:7,11; 583:20;584:24;605:18; 611:16;614:19;628:10; 639:21;640:25;653:9 <b>two-bedroom (1)</b> 664:2 <b>type (4)</b> 465:14;640:10; 660:12;665:23 <b>typed (3)</b> 421:7;447:20;474:14 <b>types (2)</b> 653:13;663:17 <b>type-up (2)</b> 420:25;421:1 <b>typically (1)</b> 453:12 <b>typo (8)</b> 410:18;420:25; 421:11,12,12;474:16, 19;541:5	<b>U</b> <b>ultimate (2)</b> 564:4;566:17 <b>ultimately (4)</b> 434:5;558:8;566:21; 567:4 <b>Umm (1)</b> 617:22 <b>unavailable (1)</b> 582:8 <b>unaware (1)</b> 569:23 <b>unclarifying (1)</b> 575:7 <b>uncle (2)</b> 640:9,15 <b>unclear (2)</b> 479:4;584:23 <b>unclothed (1)</b> 618:7 <b>under (64)</b> 408:6,21;409:18; 424:3;428:21,23; 429:1;430:12;436:12, 15,16;439:25;440:2,5, 6;442:21;443:19; 453:7;460:15;483:6,9; 484:13;486:25;487:10; 496:23;555:9;559:5; 568:21;577:23;579:15; 597:10,13,15;607:2; 610:13;613:5,22; 628:14,15,18;629:1,4, 6,11;630:1,10;631:3,5, 7,12;632:23;633:2; 636:19;637:20;659:10, 12,13;660:17,19,20; 673:14,17,18;674:1 <b>underage (6)</b> 519:1,11;623:17; 624:9,15;625:21 <b>underlies (1)</b> 487:19 <b>underlying (4)</b> 566:12,12,14,17 <b>underneath (1)</b> 613:6 <b>understood (4)</b> 415:18;417:23; 561:15;573:16 <b>underway (1)</b> 674:20 <b>underwrote (1)</b> 434:20 <b>Unfortunately (2)</b> 592:4;624:16 <b>unit (1)</b> 662:22 <b>United (1)</b> 487:15 <b>unless (3)</b>	489:11;625:2;673:18 <b>unlikely (1)</b> 674:11 <b>unredacted (2)</b> 584:2;607:16 <b>unremarkable (1)</b> 415:22 <b>unsupportive (1)</b> 582:8 <b>unwelcome (1)</b> 598:12 <b>up (80)</b> 408:2;411:4;414:3; 419:1;421:7,18; 423:23;424:13,18; 425:1,7,25;427:24,25; 429:11;430:16;437:5, 19;447:2,10,20;453:2, 4;465:23;473:11,16, 16;474:14;481:7,18; 496:4;497:21,24; 527:18;531:18,20,23; 538:24;539:10;559:7, 16;561:16,20;563:3; 564:16;565:25;570:10, 19;572:14;577:2,11; 578:17;579:9;593:13; 602:17;603:25;610:19, 21;616:3;620:10,13; 621:12;626:3;631:18; 632:7;634:12,25; 635:3,4;636:8,16; 637:10;639:7;640:3, 21,24;648:9;656:11; 671:15,20 <b>upcoming (1)</b> 442:7 <b>update (1)</b> 421:21 <b>updates (1)</b> 661:24 <b>upper (3)</b> 436:2;439:15;517:8 <b>upstairs (3)</b> 469:16;470:22; 471:20 <b>use (23)</b> 412:7,7;413:22,25; 414:1,12;415:9,20,23; 428:8;436:18;476:15; 588:4;605:4;624:20; 643:16,19;645:22,23; 655:15;660:9;662:24; 663:1 <b>used (6)</b> 427:9;476:5;554:13; 624:3;650:22,23 <b>uses (2)</b> 586:23;624:23 <b>Using (3)</b> 586:21;630:12; 655:17 <b>usually (1)</b>	411:22 <b>V</b> <b>Vague (1)</b> 547:22 <b>variation (1)</b> 463:15 <b>vast (1)</b> 580:23 <b>venues (2)</b> 587:16;661:13 <b>veracity (2)</b> 577:15;636:8 <b>verbatim (2)</b> 420:23,24 <b>verbiage (1)</b> 448:4 <b>verdict (1)</b> 574:14 <b>verdicts (1)</b> 543:4 <b>verify (1)</b> 610:14 <b>vernacular (1)</b> 446:18 <b>versus (1)</b> 465:8 <b>vibrators (1)</b> 476:6 <b>vice (10)</b> 653:23,24;655:4,8; 656:6;661:4,21;662:6, 11;669:21 <b>victim (3)</b> 482:9;578:14;590:20 <b>victims (1)</b> 626:21 <b>victims' (8)</b> 486:7;544:23; 556:10;566:23;576:21; 578:6;581:9;618:23 <b>view (6)</b> 487:22;561:9;565:5; 566:4;610:12;631:14 <b>vigorous (2)</b> 414:5;465:25 <b>Vigorously (1)</b> 466:1 <b>Virgin (1)</b> 555:19 <b>Virginia (2)</b> 541:23;546:24 <b>visit (4)</b> 457:2,11;523:4; 524:1 <b>visited (3)</b> 455:11;516:12; 517:12 <b>visits (1)</b> 654:20 <b>Visoski (2)</b> 412:23;413:4
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<b>visual (1)</b> 653:12 <b>vocal (2)</b> 442:10;550:18 <b>voice (2)</b> 535:23;586:21 <b>von (2)</b> 434:23,24 <b>Vulnerability (1)</b> 591:17	548:10 <b>week (16)</b> 442:3;453:2,5,9; 616:18;662:23,25; 669:23;670:12;674:7, 9,11;675:4,5,5,6 <b>weeks (9)</b> 414:17;523:5;524:2; 544:3;616:7,9,10,13; 628:4 <b>weigh (2)</b> 423:14;613:15 <b>weight (2)</b> 531:14;613:10 <b>weird (1)</b> 534:8 <b>welcome (2)</b> 417:18;435:10 <b>weren't (4)</b> 469:7;589:20;612:3; 619:2 <b>Werksman (3)</b> 544:18;545:4;580:25 <b>West (1)</b> 449:12 <b>what's (35)</b> 427:10;435:9;439:7; 460:18;462:14;465:4; 486:17;505:17;514:24; 516:10;518:12;523:22, 23;526:1;532:23; 536:6,7;546:5,18; 557:4;560:8;569:17; 571:18;583:6;615:20; 630:17,20;634:14,18; 653:22;656:1;658:17; 660:3;664:5;675:7 <b>whole (6)</b> 470:21;486:12; 516:20;570:7;598:25; 602:25 <b>who's (8)</b> 418:10;420:9; 428:21;566:5;570:6; 627:2;638:1;654:24 <b>whose (2)</b> 620:13;623:22 <b>wide (2)</b> 426:10;592:1 <b>widen (1)</b> 488:25 <b>Wikipedia (2)</b> 427:4,15 <b>Williams (3)</b> 467:5,16;496:8 <b>win (1)</b> 578:8 <b>winding (1)</b> 516:23 <b>window (1)</b> 462:21 <b>wired (1)</b> 558:18	<b>wish (3)</b> 619:9;663:1;673:8 <b>wishes (1)</b> 663:9 <b>withdraw (1)</b> 490:7 <b>withdrawn (1)</b> 645:15 <b>within (3)</b> 444:6;611:17;655:14 <b>without (40)</b> 419:4;422:10; 430:14;437:9;440:6; 451:11,15;469:10,18, 20,22,25;470:11; 571:23;584:3,25; 585:5;598:12;606:14; 609:22;610:17;613:24; 630:20;631:5,16; 633:4,9;645:8;646:20; 651:9;657:13;658:19; 660:7;664:25;665:16; 666:10,20;667:14; 668:1,4 <b>witness (157)</b> 409:2;410:4;412:2, 12,14,18,20;413:6,10, 14;415:5,11,13;416:3; 418:1,4,8,15,24;419:7, 16;421:14;422:23; 424:15,16;427:15,16; 428:13,14,21,25;429:5; 430:3;436:15;439:7; 440:5;445:19;460:4,6, 16;461:23,25;462:2,6, 7,10,13;463:24;464:8, 10,16;465:20;472:14; 482:23;483:9,14; 484:10,11;485:9,16,20; 486:25;489:4;496:7, 22;498:22;502:1,4; 505:19;508:22;510:1; 559:23;560:2;561:4; 563:15;565:14,17; 566:5,10;567:12,15; 568:17;569:6;570:3,5; 572:18;573:13;574:2; 575:24;577:5,9,10; 579:9,10,14;580:16; 583:15,24;584:5; 585:10;587:25;588:4; 598:21;601:9;607:19; 610:11;620:4,13,22,25; 621:20;622:15,19; 623:22;624:3,4,6,8,9; 625:13;626:15;627:2, 12;628:1,15;629:5,7, 11,17,19,20,23;630:1, 15;631:6;636:3,18,24; 637:2,3,19;638:1; 641:21;642:19;648:3, 17;652:8,10,11,22; 656:1;661:1;664:5;	671:1,6;674:5,9 <b>witness' (3)</b> 464:8,17;474:6 <b>witnessed (1)</b> 434:23 <b>witnesses (13)</b> 408:5;411:20; 421:11;424:4;460:25; 462:12;578:20;626:21; 673:13,17,20;675:3,10 <b>witnesses' (1)</b> 627:24 <b>witness's (16)</b> 409:13,25;417:2,9; 422:4;423:3,13;425:6; 445:21;485:13;564:19; 565:4;566:2;586:8; 635:17;645:12 <b>woman (22)</b> 443:12;445:5; 524:12;525:22;526:10, 22;622:17,21,22;623:4, 9;644:23;645:1,3,6,17, 20,24;646:2;651:4,16, 19 <b>woman's (1)</b> 646:2 <b>women (7)</b> 524:8;622:3;623:11, 25;624:16;626:1,1 <b>wonderful (1)</b> 663:9 <b>wondering (1)</b> 575:12 <b>word (7)</b> 455:9;488:2;528:7; 547:21;624:23;643:19; 647:24 <b>wording (1)</b> 474:14 <b>words (10)</b> 476:15;526:2; 554:13,18;619:5; 643:16,18;645:22,23; 650:22 <b>work (13)</b> 422:7;548:15; 589:10,13,17,25; 591:21;605:3;632:11, 13;634:20;653:5,6 <b>worked (4)</b> 626:19;653:20,21; 675:11 <b>working (8)</b> 408:4;424:22; 467:20;589:18,19,20; 608:23;639:19 <b>works (2)</b> 591:14;611:16 <b>world (1)</b> 537:13 <b>write (7)</b> 498:1;499:17;	557:21;576:18;593:16; 600:16;654:25 <b>writer (1)</b> 586:23 <b>write-up (1)</b> 415:5 <b>writing (4)</b> 410:23;653:12,13; 655:3 <b>written (7)</b> 420:4;448:15;480:8; 516:10;589:18;654:22; 655:11 <b>wrong (10)</b> 432:24;447:17,20; 490:7;499:5;504:8; 507:2,6,16;540:22 <b>wrote (6)</b> 431:9;433:16;486:9; 537:13,15;588:12
<b>Y</b>				
<b>wait (4)</b> 435:13,14;439:6; 606:6 <b>waiting (1)</b> 422:12 <b>waive (2)</b> 565:9;573:10 <b>waived (7)</b> 509:4;564:8,10; 571:8,9,10;573:9 <b>waiver (12)</b> 512:4;564:3;565:8; 571:10,19,22;573:2,3, 5,8;674:1,17 <b>walk (2)</b> 448:1;660:23 <b>walked (3)</b> 409:18;446:16;447:9 <b>wall (2)</b> 516:23;662:21 <b>Wallace (4)</b> 594:10,20,24;595:4 <b>Wallace's (2)</b> 594:22;595:24 <b>wants (6)</b> 412:8;423:14;485:2; 623:25;649:14;673:15 <b>war (2)</b> 670:2,3 <b>watched (1)</b> 546:15 <b>water (1)</b> 505:24 <b>way (20)</b> 412:15;414:16; 418:6;422:11;461:8, 16;462:10,12;463:16; 464:16;480:21;576:12; 579:24;584:21;590:7; 604:14;616:4;625:5; 627:19;651:2 <b>ways (2)</b> 605:13,14 <b>wearing (2)</b> 535:5,11 <b>web (1)</b> 543:5 <b>website (1)</b> 543:12 <b>websites (1)</b>				<b>yard (1)</b> 604:15 <b>year (28)</b> 434:6;436:4;448:19; 455:3,13,15;457:4; 460:23;533:20;558:18; 587:20,22,23;588:24; 589:1,13,22;596:9; 605:19;611:17;613:19; 614:9,16;633:22; 640:2;645:16;660:11; 666:1 <b>years (43)</b> 419:10;429:20; 434:9;444:4,22,23; 448:4;453:2,5,9; 454:10,13;456:20,22; 457:24;458:6,8,12; 463:14;473:12;497:11; 498:4;506:22;516:7; 548:22;580:20;590:3, 4,12;604:18;632:18, 20;634:5,8,10,21; 635:10;642:22;647:10; 653:21;658:15;665:22; 669:16 <b>year's (1)</b> 441:1 <b>yesterday (49)</b> 409:17;418:15; 424:2;430:21;432:24; 433:6;440:22;442:15; 443:11,25;446:7; 447:22;448:9,21; 451:4,8,18;453:7,11, 15;456:17;458:9; 460:10;463:24;464:23; 465:7;469:9,21;470:9, 23;471:5;472:4; 473:12,18;474:21;

475:2;497:2;516:6; 522:24;523:10;25; 524:2;537:17;538:4, 12;577:7;581:12; 620:13;636:2 <b>yesterday's (1)</b> 523:13 <b>York (40)</b> 420:18;434:6;438:9, 11;497:18,20;498:4,9; 499:9,16,22;500:3,13, 19;501:4,15,21;502:6; 503:10,12;505:8; 506:14,23,24;507:10, 20;508:10;509:22; 511:10;517:7,12; 533:2,3,7;589:3; 594:11;596:7,12,15,18 <b>young (2)</b> 504:6;542:14 <b>younger (3)</b> 444:21;445:1;605:18 <b>Yugoslavian (1)</b> 540:1 <b>Yup (3)</b> 655:4,13;666:14	443:9;453:2;498:4; 503:15;506:22;511:11; 516:13;517:10,19; 518:2;521:13;532:3,8, 9;533:20;592:8,15,22; 593:6,7,18,20,22; 594:5;616:14;617:7,9, 21,25;618:13;644:14; 662:23 <b>15 (16)</b> 430:3;449:10;453:2; 456:22;532:3,9;549:7; 550:15,16,23;594:13; 595:2;596:4;618:13; 620:7;632:20 <b>16 (29)</b> 408:9,21;409:13; 411:5,8,10,16;412:16; 413:7;414:17;416:7, 18,20;417:16;418:6; 429:22,23;430:4; 453:2;497:11;516:13; 532:3,8,9;551:2,15; 596:16;618:13;653:21 <b>16/608 (1)</b> 408:3 <b>167 (1)</b> 551:18 <b>17 (11)</b> 429:22,24,24;430:2; 511:12;552:2;594:8; 630:18;631:9,12,22 <b>18 (2)</b> 424:2;624:17 <b>19 (4)</b> 447:8;537:15,16; 544:10 <b>199 (1)</b> 551:21 <b>1990s (1)</b> 516:12 <b>1994 (15)</b> 419:21;437:1;443:9, 16;444:9;592:19; 604:10;610:25;611:3; 616:7,22;658:23; 662:2;667:16;669:17 <b>1995 (4)</b> 437:3;614:9;667:12; 669:17 <b>1996 (12)</b> 439:19;440:3,20; 442:12;487:18;550:11, 14,20;596:12,15; 668:3;669:17 <b>1997 (5)</b> 511:6;550:25;551:1, 3,13 <b>1998 (5)</b> 551:17,23;552:1; 595:25;596:7 <b>1999 (3)</b> 536:21,23;666:2	<b>2</b> <b>2 (14)</b> 437:19;441:5; 445:21,23;501:1,1,10; 504:17;506:16;532:15; 540:22;549:22;661:17; 675:20 <b>20 (7)</b> 444:4,22,23;449:10; 590:2;596:14;653:17 <b>2000 (2)</b> 580:7;666:2 <b>2000s (5)</b> 538:5,21;539:2; 552:3;553:2 <b>2002 (1)</b> 633:23 <b>2006 (3)</b> 633:23;634:7;640:4 <b>2007 (5)</b> 519:8;539:2,8; 634:11;640:4 <b>2008 (2)</b> 539:2,8 <b>2009 (2)</b> 640:25;645:18 <b>2011 (2)</b> 647:17;650:8 <b>2014 (2)</b> 634:7,11 <b>2015 (1)</b> 540:11 <b>2019 (38)</b> 446:7;447:8;451:21, 23;453:19;470:25; 471:9,14,19;472:23; 473:11,19;474:22; 475:22;479:18;497:16; 498:8,16;499:2; 502:17;503:8;504:9, 12;506:12,21;519:4; 520:2,8;528:1,3;530:4; 540:20;542:13;543:14; 544:2,10;545:20; 554:20 <b>2020 (27)</b> 448:12;455:6,22; 459:10;473:21,24; 474:23;475:7;477:22; 478:18,25;499:8,15; 500:12;502:20;504:14; 507:19;508:5,10,14; 513:11,22;516:9; 555:7;597:25;598:5; 651:7 <b>2021 (4)</b> 449:23;450:3; 540:22;675:20 <b>20-something (1)</b> 590:12 <b>20th (1)</b>	662:24 <b>245 (1)</b> 537:12 <b>27 (2)</b> 459:10;478:18 <b>2d (1)</b> 487:18 <b>3</b> <b>3 (7)</b> 459:11,17;479:14; 522:6;543:14;544:2; 659:1 <b>302 (8)</b> 410:11;418:9; 419:12;420:16,21,23; 421:7;463:17 <b>314 (2)</b> 523:13,19 <b>315 (2)</b> 523:14,20 <b>35 (1)</b> 468:7 <b>3500 (11)</b> 419:15;620:17,21; 621:23;622:1,7;624:2; 648:8,15,20;675:15 <b>3509-001 (6)</b> 452:7;506:16;522:2; 532:15;544:6;594:18 <b>3509-002 (2)</b> 447:5,7 <b>3509-003 (3)</b> 453:20,23;500:16 <b>3509-004 (1)</b> 500:15 <b>3509-005 (5)</b> 479:12,14;497:23; 504:16;520:12 <b>3509-007 (2)</b> 592:24;596:14 <b>3509-008 (10)</b> 455:7;459:11;468:5; 474:3;477:23;478:13; 480:14;512:15;513:16; 593:9 <b>3509-023 (1)</b> 541:6 <b>3509-03 (1)</b> 501:1 <b>3509-10 (1)</b> 509:24 <b>3509-28 (1)</b> 450:4 <b>4</b> <b>4 (8)</b> 432:14;459:16; 468:5,12;474:3;588:1, 20;598:9 <b>4/17/2000 (1)</b>	580:3 <b>40 (2)</b> 561:24;562:3 <b>401 (1)</b> 559:19 <b>401/403 (1)</b> 570:22 <b>403 (4)</b> 559:19;560:16; 604:23;637:23 <b>408 (17)</b> 425:23;481:22; 482:3,13;483:1,4,9; 484:13;486:25;487:10, 19;489:3,6,21;490:6,9, 11 <b>45 (3)</b> 559:12;561:17;579:2 <b>491 (1)</b> 490:17 <b>495 (1)</b> 490:17 <b>5</b> <b>5 (6)</b> 442:15,16;477:23; 520:12;594:18;662:8 <b>5:02 (1)</b> 671:7 <b>50 (1)</b> 487:18 <b>6</b> <b>6 (6)</b> 432:17;433:8,11; 504:16;512:15;557:5 <b>60 (1)</b> 594:10 <b>608 (8)</b> 408:22;409:14,18; 415:8,12;416:8,10,12 <b>611c (1)</b> 577:23 <b>613 (6)</b> 415:17,18;416:7,8; 460:15;463:22 <b>613a (1)</b> 464:6 <b>615 (2)</b> 626:18;628:4 <b>672 (1)</b> 671:24 <b>7</b> <b>7 (4)</b> 504:17;513:17; 669:23,24 <b>741 (6)</b> 656:2,12,25;657:1, 15;661:1
<b>0</b> <b>001 (4)</b> 498:16;504:17; 522:6;544:7 <b>004 (1)</b> 468:12 <b>008 (3)</b> 468:12;499:12; 507:19	<b>1</b> <b>1 (5)</b> 413:10;447:5; 453:21;592:24;667:3 <b>1:50 (1)</b> 563:2 <b>10 (1)</b> 480:14 <b>11 (6)</b> 434:12;455:23; 456:6;515:11;557:9; 593:9 <b>12 (8)</b> 455:7;557:24;631:3, 9;632:22,23;633:2,8 <b>13 (16)</b> 429:22;431:19,25; 434:9;579:24;592:14, 15,21,22;593:1,2,5,7, 17;611:4;616:11 <b>13-year-old (1)</b> 592:19 <b>14 (35)</b> 419:8;430:3;432:9;	<b>2</b> <b>2 (14)</b> 437:19;441:5; 445:21,23;501:1,1,10; 504:17;506:16;532:15; 540:22;549:22;661:17; 675:20 <b>20 (7)</b> 444:4,22,23;449:10; 590:2;596:14;653:17 <b>2000 (2)</b> 580:7;666:2 <b>2000s (5)</b> 538:5,21;539:2; 552:3;553:2 <b>2002 (1)</b> 633:23 <b>2006 (3)</b> 633:23;634:7;640:4 <b>2007 (5)</b> 519:8;539:2,8; 634:11;640:4 <b>2008 (2)</b> 539:2,8 <b>2009 (2)</b> 640:25;645:18 <b>2011 (2)</b> 647:17;650:8 <b>2014 (2)</b> 634:7,11 <b>2015 (1)</b> 540:11 <b>2019 (38)</b> 446:7;447:8;451:21, 23;453:19;470:25; 471:9,14,19;472:23; 473:11,19;474:22; 475:22;479:18;497:16; 498:8,16;499:2; 502:17;503:8;504:9, 12;506:12,21;519:4; 520:2,8;528:1,3;530:4; 540:20;542:13;543:14; 544:2,10;545:20; 554:20 <b>2020 (27)</b> 448:12;455:6,22; 459:10;473:21,24; 474:23;475:7;477:22; 478:18,25;499:8,15; 500:12;502:20;504:14; 507:19;508:5,10,14; 513:11,22;516:9; 555:7;597:25;598:5; 651:7 <b>2021 (4)</b> 449:23;450:3; 540:22;675:20 <b>20-something (1)</b> 590:12 <b>20th (1)</b>	662:24 <b>245 (1)</b> 537:12 <b>27 (2)</b> 459:10;478:18 <b>2d (1)</b> 487:18 <b>3</b> <b>3 (7)</b> 459:11,17;479:14; 522:6;543:14;544:2; 659:1 <b>302 (8)</b> 410:11;418:9; 419:12;420:16,21,23; 421:7;463:17 <b>314 (2)</b> 523:13,19 <b>315 (2)</b> 523:14,20 <b>35 (1)</b> 468:7 <b>3500 (11)</b> 419:15;620:17,21; 621:23;622:1,7;624:2; 648:8,15,20;675:15 <b>3509-001 (6)</b> 452:7;506:16;522:2; 532:15;544:6;594:18 <b>3509-002 (2)</b> 447:5,7 <b>3509-003 (3)</b> 453:20,23;500:16 <b>3509-004 (1)</b> 500:15 <b>3509-005 (5)</b> 479:12,14;497:23; 504:16;520:12 <b>3509-007 (2)</b> 592:24;596:14 <b>3509-008 (10)</b> 455:7;459:11;468:5; 474:3;477:23;478:13; 480:14;512:15;513:16; 593:9 <b>3509-023 (1)</b> 541:6 <b>3509-03 (1)</b> 501:1 <b>3509-10 (1)</b> 509:24 <b>3509-28 (1)</b> 450:4 <b>4</b> <b>4 (8)</b> 432:14;459:16; 468:5,12;474:3;588:1, 20;598:9 <b>4/17/2000 (1)</b>	580:3 <b>40 (2)</b> 561:24;562:3 <b>401 (1)</b> 559:19 <b>401/403 (1)</b> 570:22 <b>403 (4)</b> 559:19;560:16; 604:23;637:23 <b>408 (17)</b> 425:23;481:22; 482:3,13;483:1,4,9; 484:13;486:25;487:10, 19;489:3,6,21;490:6,9, 11 <b>45 (3)</b> 559:12;561:17;579:2 <b>491 (1)</b> 490:17 <b>495 (1)</b> 490:17 <b>5</b> <b>5 (6)</b> 442:15,16;477:23; 520:12;594:18;662:8 <b>5:02 (1)</b> 671:7 <b>50 (1)</b> 487:18 <b>6</b> <b>6 (6)</b> 432:17;433:8,11; 504:16;512:15;557:5 <b>60 (1)</b> 594:10 <b>608 (8)</b> 408:22;409:14,18; 415:8,12;416:8,10,12 <b>611c (1)</b> 577:23 <b>613 (6)</b> 415:17,18;416:7,8; 460:15;463:22 <b>613a (1)</b> 464:6 <b>615 (2)</b> 626:18;628:4 <b>672 (1)</b> 671:24 <b>7</b> <b>7 (4)</b> 504:17;513:17; 669:23,24 <b>741 (6)</b> 656:2,12,25;657:1, 15;661:1

**743 (6)**

658:18;659:10,15;

666:4,8;667:13

**744 (6)**

660:4,17,22;664:20;

665:3,4

**745 (3)**

664:6,12,15

**761 (2)**

588:1;614:24

**8**

**8 (6)**

499:12;507:19;

514:16;519:8;628:23,  
23

**8:45 (2)**

673:2;675:20

**801b3 (1)**

637:21

**80th (3)**

594:22;595:10,24

**87 (1)**

487:18

**9**

**9 (4)**

628:11,23,23;662:2

**90 (3)**

502:21;503:2;613:16

**94 (3)**

438:2;439:3;665:25

**95 (3)**

439:1;606:6;665:25

**96 (2)**

606:5;665:25

**98 (1)**

596:9

**99 (3)**

545:20;596:9;658:15