

April 9, 2019

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

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SHELDON BARR and THOMAS GARDNER,
Plaintiffs,

-against-

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

Defendants,

INDEX NO.: 159225/2010

-----X

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

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

DEITZ Court Reporting... A Lexitas Company
[REDACTED]-0166

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A P P E A R A N C E S:

THE LAW OFFICE OF JOSEPH FALLEK

Attorney for Plaintiffs

One Battery Park Plaza, 32nd Floor

New York, New York 10004

BY: LARRY FALLEK, ESQ.

CUOMO, LLC.

Attorney for Defendant

116 EAST 65TH STREET, LLC.

200 Old Country Road, Suite 2 South

Mineola, New York 11501

BY: MATTHEW CUOMO, ESQ.

FILE NO.: AIGPRIV 17007

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S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that:

All rights provided by the C.P.L.R., including the right to object to any question, except as to form, or to move to strike any testimony at this(these) examinations(s), are reserved, and, in addition, the failure to object to any question or to move to strike any testimony at this(these) examination(s) shall not be a bar or waiver to make such motion at, and is reserved for the trial of this action;

IT IS FURTHER STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that this(these) examinations(s) may be sworn to by the witness(es) being examined, before a Notary Public other than the Notary Public before whom this(these) examination(s) was(were) begun; but the failure to do so, or to return the original of this(these) examinations(s) to counsel, shall not be deemed a waiver of the rights provided by

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S T I P U L A T I O N S (Cont'd)

Rules 3116 and 3117 of the C.P.L.R., and shall be controlled thereby;

IT IS FURTHER STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that this(these) examinations(s) may be utilized for all purposes as provided by the C.P.L.R.;

IT IS FURTHER STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that the filing and certification of the original of this(these) examination(s) shall be and the same hereby are waived;

IT IS FURTHER STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that a copy of the within examination(s) shall be furnished to counsel representing the witness(es) testifying, without charge.

IT IS FURTHER STIPULATED AND AGREED by and between(among) counsel for the respective parties

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S T I P U L A T I O N S (Cont'd)

hereto, that all rights provided by the C.P.L.R.,
and Part 221 of the Uniform Rules for the Conduct of
Depositions, including the right to object to any
question, except as to form, or to move to strike
any testimony at this examination is reserved; and
in addition, the failure to object to any question
or to move to strike any testimony at this
examination shall not be a bar or waiver to make
such motion at, and is reserved to, the trial of
this action.

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GHISLAINE MAXWELL

G H I S L A I N E M A X W E L L, called as a witness, having been first duly sworn by a Notary Public of the State of New York, was examined and testified as follows:

EXAMINATION BY

MR. FALLEK:

Q. Please state your name for the record.

A. Ghislaine Maxwell.

Q. Please state your address for the record.

A. 44 Kinnerton Street, London, England SW183X.

MR. FALLEK: Good morning, Ms. Maxwell. My name is Larry Fallek. I represent the plaintiffs in this action, Sheldon Barr and Thomas Gardner.

I will be asking you a series of questions about an accident that occurred back on September 9, 2015. Many of the questions are going to involve your ownership. When I say, "your ownership," I am referring to the ownership of 116 East 65th Street in Manhattan.

THE WITNESS: Okay.

MR. FALLEK: Before we start I have a few

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GHISLAINE MAXWELL

basic rules I want to discuss with you. Please make all your responses verbally. The Court Reporter can't take down a shake or nod of the head. Like you are doing right now.

THE WITNESS: Of course.

MR. FALLEK: Please say yes or no.

THE WITNESS: Yes.

MR. FALLEK: And try not to shrug your shoulders or anything like that. Just make all your response verbally.

THE WITNESS: I shall.

MR. FALLEK: Please let me finish my entire question before you give an answer. The Court Reporter cannot take us both down speaking at the same time.

Q. Is that agreeable?

A. Yes.

MR. FALLEK: It's important that you stop me if you don't understand a question. If you do give an answer, I will assume that you understand my question.

Q. Is that understood?

A. Yes.

Q. The address that you just gave the Court

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GHISLAINE MAXWELL

Reporter, how long have you lived there?

A. '92, '93.

Q. Is that your primary residence at this time?

A. No. It's just a home that I have.

Q. How many homes do you own back in September of 2015?

A. Two.

Q. Where are those homes?

A. 116 East 65th Street and the one in London.

Q. When you say, "the one in London," you are referring to the address that you just gave?

A. Yes.

Q. Is that a private home?

A. Yes.

Q. Is that home owned by you individually or some other form?

A. It's owned by me.

Q. Is your name on the deed to that property or the title of the property?

A. It was back then. I kind of -- it was up until recently. I don't know. I can't remember what it is now, if I changed it or not.

Q. Back in September of 2015, did you or any

1 GHISLAINE MAXWELL
2 of your entities or companies own any other homes?

3 A. No.

4 Q. What was your primary residence back in
5 September of 2015?

6 A. 116 East 65th Street.

7 Q. Can you tell me how much time you spent
8 there, say, back in 2015 from January 1st through
9 September 9, 2015?

10 A. A lot of time. I lived there. That's my
11 primary residence.

12 Q. Did you travel back and forth between
13 London and New York?

14 A. Extensively at all the time. I just don't
15 go to London. I travel all the time to a lot of
16 different places.

17 Q. For what purposes do you travel, business,
18 pleasure, or something else?

19 A. I do business. But, it was also I work
20 on -- I work for a not-for-profit. And I do a lot
21 of time doing conferences and a lot of speeches.

22 Q. I'm just talking about the time period of
23 January 1, 2015 through September 9, 2015.

24 Would that be true with regard to that time
25 period?

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GHISLAINE MAXWELL

Q. In what?

A. French and history from Oxford. It's a BA MA. So when you go to Oxford and you get a bachelor's and some time passes and it turns into a master's.

Q. What is the BA in?

A. French and history.

Q. It's a combined degree?

A. Double honors degree in French and history.

Q. Do you have any other degrees?

A. No.

Q. Do you have any professional degrees or licenses?

A. I do.

Q. In what?

A. I'm a registered emergency technician, first responder, EMT. I'm a helicopter pilot.

Q. Sorry?

A. Helicopter pilot.

Q. Is your certification as an EMT in the United States or another country?

A. In the U.S.

Q. You didn't offer any medical assistance to the Plaintiff in this action?

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GHISLAINE MAXWELL

A. No.

Q. Are you presently employed?

A. No.

Q. Are you self-employed?

A. No.

Q. What was the last job that you had?

A. The last job I had was at Ellmax.

E-L-L-M-A-X.

Q. What is Ellmax?

A. It's no longer in existence.

Q. What was it?

A. It was a company I started to advise other businesses on board placement, placing board of directors, and any other questions they might have, conferences, locations for conferences, speakers at conferences.

Q. What is the primary business? Is it Ellmax, LLC.?

A. I think so.

Q. Is that a Florida Limited Liability Company?

A. Whatever paperwork I have. I don't recall. Whatever it says on the paperwork.

MR. FALLEK: I'm going to show you three

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GHISLAINE MAXWELL

documents that we will have marked as
Plaintiff's Exhibit 1, 2, 3.

(Whereupon, the document dated 9-18-14,
was received and marked as Plaintiff's Exhibit 1
for identification, as of this date, by the
reporter.)

(Whereupon, the document dated 2-23-15,
was received and marked as Plaintiff's Exhibit 2
for identification, as of this date, by the
reporter.)

(Whereupon, the document dated 3-22-16,
was received and marked as Plaintiff's Exhibit 3
for identification, as of this date, by the
reporter.)

MR. FALLEK: I'm directing your attention
to the document we just marked as Plaintiff's
Exhibit 1 for identification.

Q. Do you recognize this document to be the
2014 Florida Limited Liability Annual Report for
Ellmax, LLC.?

A. I have not seen this document before so I
can't say that.

Q. Just take a look at it.

A. I'm looking at it, but it's the first time

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GHISLAINE MAXWELL

I've seen this.

Q. Did you form Ellmax, LLC.?

A. I did.

Q. Is it your company?

A. It is. It was.

Q. When was it formed?

A. I think 2010 or '11.

Q. Was it formed in Florida?

A. I guess. I'm sorry, I just don't recall.

Q. Could you tell me what the business purpose of Ellmax, LLC. is?

A. It was a vehicle for me to be able to advise companies on board of directors and to help with companies for conferences and speakers for their conferences.

Q. Board of directors of what type of companies are you advising people on?

A. Mostly technology businesses, because I know a lot of people in technology. It could be in anything as a board of directors are needed in any type of company. And people of good character and outstanding abilities in business are always needed. And I, fortunately, have a lot of friends and people in that area that I will be able to place people in

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GHISLAINE MAXWELL

those type of companies.

Q. Was the principal place of business of Ellmax, LLC. at 116A East 65th Street, New York, New York?

A. It wasn't that specific. It was wherever I was. Everything that is in my head is my contact, my ideas.

Q. Specifically the document in front of you, when you formed it, did you indicate that the principal place of business was 116 East 65th Street, New York, New York?

A. I think it was just filed there. It would be easier for me other than any other reason.

Q. Did you sign the documents for the limited liability company known as Ellmax, LLC.?

A. I'm sure I did with my lawyers. There was no reason other than as an address of convenience.

MR. FALLEK: Move to strike the nonresponsive portion.

THE WITNESS: I'm not trying --

MR. FALLEK: Just try focus on the question that I'm asking you.

THE WITNESS: I'm not trying to be evasive.

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GHISLAINE MAXWELL

Q. Who is [REDACTED]

A. She's my personal assistant.

Q. How long was she your personal assistant?

A. More than ten years.

Q. More than ten years from today?

A. No. She doesn't work for me anymore.

Q. When did you start working for you?

A. Again, some time in 2001, 2002. Something like that.

Q. Was she your personal assistant for the next ten years?

A. Yeah.

Q. Was she paid by Ellmax, LLC.?

A. I paid her myself.

Q. Did you pay her out of a different company or different funds or what source?

A. I don't recall where I paid her from exactly. She was not an employee of -- I was the only person that did any work for Ellmax. She was my personal assistant. She was able -- she would do anything I would ask her to do as regards to my travel, whatever. But she was -- she couldn't help me with Ellmax. She didn't know people to place them on board. If I directed her to get me on A

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GHISLAINE MAXWELL

flight or something that may have been in relation to business opportunity, she would do that.

Q. What is her current address?

A. I don't know.

Q. Do you know what state she lives in?

A. I think she's in [REDACTED] somewhere.

Q. Back in 2016, did she live at 116 East 65th Street, New York, New York?

A. No.

Q. Where did she live in 2016?

A. Somewhere in New Jersey.

MR. FALLEK: Directing your attention to Plaintiff's Exhibit 2 for identification.

Q. Is that the 2015 Florida Limited Liability Company for Ellmax, LLC.?

A. Again, I have not seen this before. I have to take -- I haven't seen this before. So I'm assuming that's what it is.

Q. Were regular annual reports filed by Ellmax, LLC.?

A. Again, that would have been my accountant, I would assume, would have a list of what is expected or legally.

Q. Who was your accountant back then?

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GHISLAINE MAXWELL

A. I am sorry, I don't recall the name at this moment.

Q. What was the name of the company that you worked for?

A. I don't recall. I am sorry.

Q. Was he in New York or Florida?

A. In New York, I believe.

Q. Was there a reason you chose a Florida Limited Liability Company for Ellmax, LLC.?

A. I don't know why. I don't remember.

Q. Were you also a Florida resident back in 2016?

A. I lived in Florida at certain times since I moved to the states.

Q. What is your address in Florida?

A. I lived in a number of different places in Florida.

Q. Do you own real estate in Florida?

A. No.

Q. At any point did you maintain a residence in Florida?

A. I've never owned a home in Florida.

Q. Did you rent the same residence in Florida?

A. No.

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GHISLAINE MAXWELL

Q. How many months of the year, let's say, in 2016 did you reside in Florida?

A. Probably none.

Q. How much time did you spend in Florida in 2016?

A. Probably, I don't know, less than -- I don't know. A few weeks. Two weeks, three weeks.

Q. What about in 2015?

A. I don't remember the dates. Maybe the same.

Q. The principal place of business in 2015 is still listed as 116A East 65th Street, New York, New York.

A. That would have all been the address for convenience.

Q. That address was never changed was it?

A. I don't believe so.

Q. Was the address of Ellmax always the same from the time it was formed until up the time you say you dissolved it?

A. As far as I can recall, yes.

MR. FALLEK: I am directing your attention to Plaintiff's Exhibit 3 for identification.

Q. Do you recognize this document?

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GHISLAINE MAXWELL

A. Sorry.

Q. Plaintiff's 3 for identification, do you recognize this to be the 2016 Florida Limited Liability Company Annual Report for Ellmax, LLC.?

A. Again, I have never seen this. I will just take your word that that's what that is.

Q. In 2016, was the principal place of business for Ellmax, LLC. also listed as 116 East 65th Street, New York, New York?

A. Again, that was the address of convenience. The business is wherever I am, but yes.

MR. FALLEK: Move to strike the nonresponsive portion of the answer.

Q. Did Ellmax, LLC. ever have a different principal place of business?

A. I don't believe I had any other address of convenience than the one it has listed.

MR. FALLEK: Move to strike as nonresponsive.

Q. Is the answer no?

A. No.

Q. No it never had any other principal place of business?

A. No.

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GHISLAINE MAXWELL

Q. What were the assets of Ellmax, LLC.?

A. It didn't have any assets.

Q. Who were the members of the limited liability company?

A. I believe I was the sole member.

Q. Did Ellmax, LLC. have any employees?

A. No.

Q. I believe you said the last job you had was for Ellmax, LLC.?

A. Last work that I did as you asked.

Q. Before you worked for Ellmax, LLC., whom do you work for?

A. I was unemployed.

Q. During what period of time was that?

A. I believe around 2000 -- about 2009 or '08.

Q. When did you first move to the United States to live here continuously?

A. 1991.

Q. Where did you live in 1991?

A. I was traveling around the states.

Q. Was 116 East 65th Street, New York, New York, the first residence that you had in the United States?

MR. FALLEK: You seemed confused. I will

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GHISLAINE MAXWELL

ask it a different way.

Q. Where was the first place you lived in the United States?

A. I rented.

Q. Where did you rent?

A. I rented a place on 59th and Seventh.

Q. Did there come a time period where you purchased a residence?

A. Yes.

Q. When was that?

A. When I purchased 116, I believe, in 2000.

Q. Before 116 was purchased, did you form 116 East 65th Street, LLC.?

A. No. I don't believe so, no.

MR. FALLEK: Could we have this marked as Plaintiff's Exhibit 4 for identification.

(Whereupon, the document dated 4/5/19, was received and marked as Plaintiff's Exhibit 4 for identification, as of this date, by the reporter.)

Q. Before we get to this document. Was there a time period in which [REDACTED] lived in Manhattan?

A. I don't know.

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GHISLAINE MAXWELL

Q. You said she was your personal assistant.

A. I did.

Q. Was that a remote job or did she live with you or lived nearby?

A. She never lived in my home. I can't recall. Wherever she lived I don't know. I'm sorry.

Q. Was it a full-time or part-time job?

A. It was full-time.

Q. How would you communicate with her?

A. Via, email, text, or phone.

Q. During what time period, if any, did she live in New York?

A. I don't know if she lived in New York. She worked for me, and she turned up for work for me. But, I don't know where she lived.

Q. Did you have somebody else, a different personal assistant for you, in Manhattan?

A. No.

MR. FALLEK: I'm going to show you what was marked as Plaintiff's Exhibit 4 for identification. I ask you to take a look at that document.

Q. Do you recognize this document to be a

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GHISLAINE MAXWELL

document from the New York State Department of State regarding 116 East 65th Street, LLC.?

A. I have never seen this document before.

Q. Could you please take a look at it.

MR. CUOMO: I think she has.

A. I've looked at it.

Q. Did you form 116 East 65th Street, LLC.?

A. Yes.

Q. When was it formed?

A. Some time in 2000.

Q. Is that prior to the time that 116 East 65th Street was purchased?

A. I don't know the timing of it when it was purchased. I don't know when the time was for the creation of it and the purchase of the house. I'm sorry.

Q. Is 116 East 65th Street a limited liability company?

A. I believe so.

Q. Is it a New York Limited Liability Company?

A. I don't remember where it is limited. It says, New York.

Q. Who are the members of that LLC?

A. I believe I'm the sole member.

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GHISLAINE MAXWELL

Q. Was there ever any other members?

A. I don't believe so.

Q. Could you tell me who Darren Indyke, Esq. at 475 West Avenue, New York, New York is? Could you tell me who he is?

A. He is a lawyer.

Q. What is his connection with the LLC?

A. He helped create it.

Q. Did you hire him to create it?

A. I don't recall how it went down exactly. How he came to do it. But, he was the lawyer. And he helped create it.

Q. Was he referred to you by somebody?

A. He worked for a friend of mine.

Q. Who is that?

A. A gentlemen called Mr. Epstein.

Q. Sorry?

A. A gentleman.

Q. Is that Jeffrey Epstein?

A. Yes.

Q. What was the principal place of business of 116 East 65th Street, LLC.?

A. Well, 116 didn't do any business.

Q. What was the principal place business? Do

1 GHISLAINE MAXWELL
2 you maintain books for it?
3 A. I don't have any paperwork regarding that.
4 I don't have. It would have been with the
5 accountant or whoever was dealing with it then.
6 Q. Were there annual returns that were
7 prepared for that LLC?
8 A. I'm sure there were.
9 Q. Did you sign them?
10 A. I must have.
11 Q. Where are they?
12 A. So long ago I have no idea. I don't have
13 that.
14 Q. Did there come a time period where 116 East
15 65th Street, LLC. purchased the building at 116 East
16 65th Street, New York, New York?
17 A. I am sorry, I don't know the -- I think
18 so.
19 Q. Who owned your building?
20 A. 116 East 65th Street, LLC.
21 Q. When was it purchased by them?
22 A. Like I have said, some time in 2000.
23 MR. CUOMO: Before you ask another question
24 I just want to talk to my client for a moment.
25 (A short recess was taken.)

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GHISLAINE MAXWELL

Q. Did you review any documents today before
testifying?

A. Only what was filed with the court with my
lawyer.

Q. Did you read or review your affidavit
before testifying today?

A. I did review?

MR. FALLEK: Mark this as Plaintiff's
Exhibit five.

(Whereupon, the affidavit was received and
marked as Plaintiff's Exhibit 5 for
identification, as of this date, by the
reporter.)

MR. FALLEK: I will show you what was
marked as Plaintiff's Exhibit 5 marked for
identification.

Q. I will ask if that is the affidavit that
you reviewed?

A. I'm going to read it to make sure.

Q. Take your time.

A. Is that okay?

Q. Sure. Did you have a chance to read it?

A. I have.

Q. In your affidavit, in Paragraph 9, you say

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GHISLAINE MAXWELL

that Ellmax, LLC. was a holding company when I started in 2010 with the intention of using for any consultation work that I may have done. What are you referring to? What consultation work that I may have done?

A. Like I have explained earlier. I advised businesses or wanted to advise businesses in 2010 on placing people on boards or on any other aspect of business that would be relevant, conferences, and providing speakers for conferences.

Q. You used the words "I may have done." Was that work you already had done or going to do?

A. That I was hoping to do.

Q. Were you one of the speakers or were you looking for other speakers?

A. I have spoken, but I've never hired myself to speak.

Q. For Ellmax?

A. No. That would have been funny.

Q. You indicated also that you never took deductions on your taxes as a home office. Did you file income taxes in 2015?

A. I did.

Q. What taxes did you file in the United

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States?

A. Whatever I needed to file.

Q. Did you file a New York State Income Tax?

A. I'm sure I did.

Q. Did you file Federal taxes in the United States?

A. I'm sure I did.

Q. What about City taxes? Did you also file those?

A. I'm sure I did.

Q. You also indicated in Paragraph 11, in 2010 when I started, you had said that you hired an assistant to Ellmax, LLC's payroll in 2017. Who was that?

A. That was [REDACTED]

Q. Was that the same person that we spoke about before?

A. Yes.

Q. That's [REDACTED]

A. Yes.

Q. What location did she work out of other than New Jersey?

A. I believe her home.

Q. Do you know if she worked out of her home

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any other years?

A. She worked. She was on call. She would have done work from her home.

Q. What did she do for Ellmax, LLC.?

A. She didn't do any work for Ellmax. She worked for me. She was my personal assistant. But if I asked her to make a flight or something, then it would have been.

MR. CUOMO: Just clarify. Are you asking about 2017?

MR. FALLEK: Yes. She said added her in 2017 on Ellmax's payroll.

Q. Why did you add her to the payroll?

A. I misunderstood the question.

To shutdown the company. We restarted it start to shut it down.

Q. Did she work for Ellmax prior to 2017?

A. No. She -- whatever -- Ellmax was dormant from 2013 until I restarted to shut it down.

MR. FALLEK: Move to strike as not responsive.

Q. You did file annual reports, did you not, in 2014, '15, and '16 for Ellmax, LLC.?

A. Right. But, it was just, you know, to

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keep -- rather than going through the expense to shut it down. It's expensive to shut it down.

Q. So the answer is: No, you did file them all those year?

A. It was filed, but it was dormant.

Q. Did you have to file a fee every year?

A. I'm sure I did.

Q. What is the address at 16 Island Avenue, Suite 70, Miami Beach, Florida 33139?

A. That was a home that I rented for a short while, and I stayed at the address.

Q. When did you rent it?

A. I don't recall the dates. I am sorry.

Q. Was it in the year 2014.

A. I honestly don't remember.

MR. FALLEK: I'm showing you what was marked as Plaintiff's Exhibit 1 for identification, which it dates back to 2014.

MR. CUOMO: She said she doesn't remember.

A. I'm sorry, I don't recall.

Q. In the year 2015 the address changed, is it not, to New York, New York?

A. It has.

Q. Do you know where the articles of an

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organization are for 116 East 65th Street, LLC.?

A. I don't.

Q. Do you know who has them?

A. I don't.

Q. Do you know what the business purposes was for forming 116 East 65th Street, LLC.?

A. I think it's a common practice to place them as an LLC. I don't think there is anything unusual about that.

Q. Was that based on your accountant or a legal advise or on your own?

A. I'm sure that was based on legal advise.

Q. Did you have a lawyer that formed it for you?

A. You are asking things to go back over 20 years. I don't recall exactly how it went down.

Q. Did you utilize the services of a broker in purchasing 116 East 65th Street?

A. I don't remember.

Q. Did you utilize the services of a broker when selling 116 East 65th Street?

A. I did.

Q. Was that Douglas Elliman?

A. It was.

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Q. How much did 116 East 65th Street, LLC.
pay for the purchase of 116 East 65th Street in
Manhattan?

A. Around, I think it was, \$6,000,000. Around
6,000,000.

Q. Could you describe the building to me at
116 East 65th Street?

A. What do you mean?

Q. Let's start with, how many floors did the
building have?

A. Five.

Q. That includes the roof and the basement?

A. No. I think the basement would be six. If
you count the roof then seven.

Q. What was the square footage of the
building?

A. Around 6,500 or 6000 (sic). Something like
that.

Q. How many bedrooms did it have?

A. Four.

Q. How many bathrooms?

A. Four.

Q. Was the lot a 25 foot wide lot?

A. Yes.

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Q. Was this a limestone building?

A. Yes.

Q. Did it have an elevator?

A. Yes.

Q. Was there a separate entrance that the building had? How many entrances did 116 East 65th Street have?

A. Two.

MR. FALLEK: I will show you a document I will have marked as Plaintiff's Exhibit 6.

(Whereupon, the copy of a photograph was received and marked as Plaintiff's Exhibit 6 for identification, as of this date, by the reporter.)

Q. Do you recognize what is shown in Plaintiff's Exhibit 6 for identification?

A. I do.

Q. What do you recognize that to be?

A. 116 East 65th Street.

Q. Is that the building that was purchased by 116 East 65th Street, LLC.?

A. Yes.

Q. Does that document or that photograph fairly and accurately show the way the building

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appeared back on September 9th of 2015?

A. I suppose.

Q. Was there a tree or tree well in front of your premises?

A. Yes.

Q. Was a portion of the tree well was part of your premises and your neighbor's premises?

A. No.

Q. Do you recognize the metal cage surrounding the tree well?

A. Yes.

Q. During the time period that 116 East 65th Street owned the building, did you or anybody on your behalf make any changes to the tree or the tree well?

A. This tree well that you demonstrate here in this photograph, is the tree and the tree well belonging to my neighbor at 114 East 65th.

Q. Is a portion of that tree going on your property?

A. I don't recall, but that's the address of the tree.

Q. Did you ever discuss the tree or tree well with your neighbor?

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A. No.

Q. You said it's whose tree well?

A. Diandra.

Q. Diandra Douglas?

A. Yes.

Q. Did they live there before you moved in there?

A. No.

Q. When did they move in?

A. I don't recall exactly. Maybe 2005 or '06. Something like that.

Q. At any time did you sweep the leaves from that tree on that portion of the sidewalk in front of your premises?

A. Can you repeat the question?

Q. Was there anytime that you lived at 116 East 65th Street where you maintained the tree that we are referring to in the photograph?

A. Diandra's tree?

Q. Yes.

A. No.

Q. Did you ever trim the branches?

A. No.

Q. Did anybody on your behalf ever water the

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tree?

A. No.

Q. Did you do anything or have anyone do anything around the tree well?

A. Around Diandra's tree?

Q. Yes.

A. No.

Q. Did you ever discuss the tree with Diandra?

A. No.

Q. The sidewalk that is depicted in the picture, were any changes made to that sidewalk by you or anybody on your behalf during the time period that 116 East 65th Street owned the premises?

MR. CUOMO: Hold on a second. From that photograph can you tell?

MR. FALLEK: I'm not talking about that. I'm just directing her to the sidewalk.

MR. CUOMO: Hear me out. I have a question for you. Are you representing that all of the sidewalk in that photograph depicted is Exhibit 6 is in front of 116 East 65th Street or are you asking her part from that photograph in front of 116 East 65th Street?

MR. FALLEK: Let's first ask about the

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photograph.

Q. Was any work done by you or anybody to that area that is shown in the photograph?

A. I've never directed anybody to do any work on the sidewalk.

Q. Did anybody do any work to the sidewalk during that time period that you lived there?

MR. CUOMO: Again, note my objection. Are you talking about the sidewalk in front of her home or the sidewalk that is in the photograph, which could be in front of multiple buildings?

MR. FALLEK: The sidewalk in the photograph.

A. I don't remember work being done passed me on the sidewalk. But, there was work, I believe, done around Diandra's tree. But, I don't know.

Q. What was the work done around Diandra's tree?

A. That tree is a big tree. It has a lot of roots. And I think there was some work done around her tree and her tree well, but I don't recall.

Q. Do you remember when that was?

A. I don't.

Q. Was it before September 9, 2015?

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A. Any work would have been done around that tree would have been done prior to that, yes.

Q. The work you are referring to, was that done to the tree, the tree well, or the sidewalk?

A. I apologize, I just don't know. I don't know.

Q. Besides the Diandra did anybody else live in the house during that time period?

A. Any house?

Q. Diandra's house.

A. I don't know who lived with Diandra.

Q. We are referring to 114 East 65th Street?

A. 114, yes.

Q. Did you ever talk to her about the condition of the tree, the tree roots, or the sidewalks prior to September 9, 2015?

A. No.

Q. Did anybody ever complain to you about the condition of the sidewalk in front of your premises before September 9th of 2015?

A. No.

Q. Did you ever receive any violations from the City of New York or anybody regarding the condition of the sidewalk in front of your premises?

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A. No.

Q. Who lived in 116 East 65th Street on
September 9, 2015?

A. Excuse me?

Q. Are you married?

A. I was not married at the time of this.

Q. Do you have any children?

A. No.

Q. Did you have any help that lived in the
house with you?

A. No.

Q. Did you have a housekeeper?

A. I did have a housekeeper, yes.

Q. Live out or live in?

A. Out.

Q. How many days a week did she come to your
home?

A. She came every day during the week.

Q. That was Monday through Friday?

A. Correct.

Q. What was her name?

A. Maritsa.

MR. CUOMO: Just to be clear now, you are
talking about 2015?

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MR. FALLEK: Yes, back in September of 2015.

A. That's how I answered your question.

Q. Maritsa worked for you five days back then?

A. Yes.

Q. What were her duties and responsibilities?

A. She was my housekeeper. So she would keep the house clean, and she would do the laundry. And she would Hoover. She would help me cleanup in the kitchen after I made a mess.

MR. CUOMO: I have to break in there.

(A discussion was held off the record.)

Q. Who was responsible to take care of the outside of the home specifically the sidewalk in front of your home?

A. I don't. But, I didn't designate anybody to clean the sidewalk or whatever.

Q. Did somebody maintain the sidewalk in front of the home back in 2015?

A. No.

Q. Who would sweep the sidewalks?

A. I don't know.

Q. If there was snow, who would shovel the sidewalk?

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A. I'm not sure.

Q. Did you hire an outside contractor or gardener or a person to maintain the exterior?

A. No.

Q. Did you enter the premises through the front door every time you went in and out?

A. Sometimes mostly.

Q. How else would you go in the house other than the entrance that is shown in the photo in front of you?

A. You could go in the other entrance. Obviously, I mostly used the front entrance.

Q. You said there were two entrances.

A. Yes.

MR. FALLEK: Could we have this marked.

(Whereupon, the copy of a photograph was received and marked as Plaintiff's Exhibit 7 for identification, as of this date, by the reporter.)

MR. FALLEK: I will show you a photograph, which we marked as Plaintiff's Exhibit 7 for identification.

Q. Have you seen this photograph before?

A. I have not.

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Q. Do you recognize what is shown in that photograph?

A. I do. But, I don't know what this bag is (indicating).

Q. That makes two of us.

MR. CUOMO: Just notice the bag hanging from the door handle.

Q. Separate from the bag, do you recognize --

A. I do.

Q. Is that a door to the premises of 116 East 65th Street, New York, New York?

A. It appears to be, yes.

Q. How do you refer to this entrance? Is it the service entrance, business entrance?

A. Separate entrance.

Q. Where does this entrance lead?

A. To the house.

Q. Have you ever received or seen the Certificate Of Occupancy?

A. Have I?

Q. Seen the Certificate Of Occupancy for the house?

A. I don't recall seeing it.

Q. Is the building a two-family residence?

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A. I believe it is valued, but I think it has a designation as a two-family residence or however you say that.

Q. Did you have a dog at the time that you lived in the building?

A. Yes.

Q. Was that Beware Of Dog sign put up by you or someone on your behalf?

A. I put it up.

Q. Who would walk the dog when you lived there back in 2015?

A. I walked my dog. [REDACTED] walked my dog or whoever.

Q. Did you regularly walk the dog yourself?

A. Yes.

Q. Is there a back entrance to the building?

A. No.

Q. In order to walk the dog, would you have to go out the front door or the side door?

A. You could go out either entrance.

Q. Would you go in and out one of those doors every day?

A. Yes.

Q. Is there a buzzer or intercom system for

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that entrance?

A. I don't think so.

Q. What about for the front door, the door that is shown in Exhibit 6 for identification?

A. There was a buzzer for that door.

Q. How many buzzers were there?

A. Just one I think.

Q. Where would it buzz in the interior --

A. Buzz to the telephone.

Q. To the telephone?

A. Yes.

Q. Where is the telephone kept?

A. Telephone everywhere. All the telephones would go. You couldn't fail to hear the doorbell.

Q. Who would answer the door? Would that be you or someone else?

A. Whoever got to it first.

Q. Who would that be? Would you say Maritsa?

A. Typically me or [REDACTED] or Maritsa, whoever.

Q. Were there times when [REDACTED] was in the house back in September of 2015?

A. Yes.

Q. What about in August of 2015, were there also times where she would be in the house?

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A. Yes.

MR. FALLEK: Could I have this marked.

(Whereupon, the diagram of the house was received and marked as Plaintiff's Exhibit 8 for identification, as of this date, by the reporter.)

(Whereupon, the diagram of the house was received and marked as Plaintiff's Exhibit 9 for identification, as of this date, by the reporter.)

MR. FALLEK: I will show you what was marked as Plaintiff's Exhibit 8.

Q. Do you recognize what has been marked as Plaintiff's Exhibit 8 for identification?

A. Yes.

Q. When you sold the premises, 116 East 65th Street, is this a diagram that was used in order to sell the home?

A. I think it was, yes.

Q. Do you recognize what is depicted in that diagram?

A. Yes.

Q. What is it?

A. It says office.

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Q. What is here generally?

A. Sorry.

Q. What is depicted in the diagram?

A. The house.

Q. Does it fairly and accurately show the layout of the house, 116 East 65th Street?

A. Yes.

Q. Did the home have an office in it?

A. It was called an office.

Q. How big was that area labeled as an office?

A. It says here 17.3 feet, 17 feet 3 inches x 8 feet 3 inches.

Q. Were there computers kept in that office?

A. There was a computer in that office.

Q. What kind of computer was it?

A. I think it was a Mack.

Q. Was it a laptop or desktop?

A. I think it was a desk top. It could have been a laptop. I don't know.

Q. Who owned that desktop?

A. Well, if it was a desk top it would have been me. Actually I think it was laptop in 2015.

Q. Back in September of 2015, was there a desk

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2 also in that room?
3 A. Yes.
4 Q. Was there a copy machine?
5 A. There may have been.
6 Q. Was there a fax machine?
7 A. No.
8 Q. What other equipment was kept in that
9 office?
10 A. No equipment. I can't remember if it was a
11 laptop or a desktop. [REDACTED]
12 generally sits.
13 Q. Was there any other office equipment kept
14 in their?
15 A. No.
16 Q. Was there a door to that room?
17 A. Yes. There was also a coffee station.
18 There was a little coffee sink, a little fridge in
19 there for access in the garden. It's like a garden
20 room. You could get a drink if you were sitting in
21 the garden back here.
22 MR. FALLEK: I will show you what was
23 marked as Plaintiff's Exhibit 9 for
24 identification. This is just a blow-up or
25 larger version of Plaintiff's Exhibit 8 for

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identification.

Q. Does this fairly and accurately show the layout of the building at 116 East 65th Street as it existed back in September of 2015?

A. Yes.

Q. Was there any portions or rooms in this building rented out or separated?

A. No.

Q. Was anything cordoned off?

A. No.

Q. What was kept in the basement of the building?

A. Laundry mostly.

Q. What was on the roof of the building?

A. Nothing. AC I think.

Q. On the first floor there is also a library?

A. That's what it says.

Q. Did you utilize that room as a library?

A. No. It was more like I use it to watch TV. There was big screen in that room.

Q. Was there a room in that building where you stored business records?

A. No.

Q. Where did you store your business records

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back in 2015?

A. I didn't have business records.

Q. Where did you keep the records for Ellmax, LLC.?

A. I use to move my -- I had a file cabinet wherever I was sitting. I had a filing cabinet.

Q. Where would that be kept? On what floor in the building?

A. It moved. I frequently moved my desk. I couldn't decide where I would sit. There was a period of time in the dining room became a place where I would sit and the library. When I moved my desk my little filing system cop come with me.

Q. Did you conduct business out of 116 East 65th Street?

A. No.

Q. Where did you conduct any business for Ellmax, LLC.?

A. I go to any client and I would go to their office.

Q. Tell me about your Terramar Projects?

A. It's a not-for-profit based on the ocean.

Q. When did you form the Terramar Project?

A. I think it was in 2011 or 2012.

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Q. That would be have been before September 9, 2015?

A. Yes.

Q. Who is the president of the Terramar Project, Inc.?

A. I am.

Q. Is that a New York Corporation?

A. I don't remember where it was filed. If you have the paperwork in front of you and it says New York then yes.

MR. FALLEK: I will show you a document marked as Plaintiff's Exhibit 10. Let's mark it first.

THE WITNESS: Could I use the bathroom?

MR. FALLEK: Yes. Whenever you need a break just ask.

(Whereupon, the 2012 tax document was received and marked as Plaintiff's Exhibit 10 for identification, as of this date, by the reporter.)

(A short recess was taken.)

MR. FALLEK: I will show you what was marked as Plaintiff's Exhibit 10 for identification.

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Q. Do you recognize this document to be the 2012 tax return for Terramar?

A. I have not seen this.

Q. Take a look at it.

A. It appears to be.

Q. Okay. Does your signature appear on the document?

A. Yes.

Q. Is that your signature?

A. Yes.

MR. CUOMO: Referring to the bottom of the first page of the document?

MR. FALLEK: Yes.

Q. Referring to the bottom portion next to the yellow label of Plaintiff's Exhibit 10. Directing your attention to Page 8 of the tax return. Do you see this page?

A. I do.

Q. Did you indicate in this tax return that you worked 60 hours a week on the Terramar Project?

A. Yes.

Q. Did you have other officers at that time that worked for the Terramar Project?

A. Well, [REDACTED] done 23 hours.

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Q. Is that accurate?

A. I'm sure it is.

Q. Who are the other people that you have listed?

A. Larry Kevin.

Q. Who was he?

A. He was the director.

Q. You have him one hour, one hour a week?

A. It says average hours per week. One hour a week.

Q. What did he do for the Terramar Project?

A. He gave advise as to how to best practices for charity.

Q. What about Ariadne Calvo-Platero, what did that person do?

A. She again gave advise as to how far Terramar could realize its goals.

Q. Are there any other employees for the Terramar Project that are not listed on the tax return?

A. The Terramar Project didn't have any employees.

Q. These are merely the officers of the company?

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A. Yes.

Q. How did they get paid?

A. They didn't get paid.

Q. Were there any salaried employees?

A. No.

MR. FALLEK: Mark this as 11.

(Whereupon, the 2013 Tax Return was received and marked as Plaintiff's Exhibit 11 for identification, as of this date, by the reporter.)

Q. In 2012 the principal place of business Terramar Project was located at 116 East 65th Street, New York, New York?

A. Again. That would be just an address of convenience, but yes.

Q. In 2013, was the principal place of business for the Terramar Project also listed at 116 East 65th Street, New York, New York?

A. Yes.

Q. Directing your attention to, and not a numbered paged, page 5 of the tax returns.

Is there a schedule of varies personnel that worked or were officers for Terramar Project.

A. These are just all directors and none of

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GHISLAINE MAXWELL

them were renumerated. Nobody was paid. But, Terramar Project did have work called contract contractors who did do work for it. A contract employee or contract person that worked for the company is not the same as a regular employee. They wouldn't come to work.

Q. Who was that?

A. I have had a number of -- I had a number of different people. We also have one person who did work for Terramar Project. They were always offsite, because they would never come to work. They would be remote.

Q. Were there any contracting employees back in 2015 for Terramar Project, Inc.?

A. There were, yes.

Q. Who were they?

A. One. I believe it was Robert Foos.

Q. In what position did he hold?

A. I think his official title was Director Of Development.

Q. Does the additional data sheet indicate that you were also working 60 hours a week for Terramar Project back in 2013?

A. Yes.

1 GHISLAINE MAXWELL

2 MR. FALLEK: Mark this.

3 (Whereupon, the 2014 Tax Return was

4 received and marked as Plaintiff's Exhibit 12

5 for identification, as of this date, by the

6 reporter.)

7 MR. FALLEK: I will show you what was

8 marked as Plaintiff's Exhibit 12 for

9 identification.

10 Q. I'm asking you if you recognize this to be

11 the 2014 Tax Return for Terramar Project?

12 A. Again, I have not seen this document, but

13 actually it seems to be as you described it.

14 Q. At that time the principal place of

15 Terramar Project was at 116 East 65th Street, New

16 York, New York?

17 A. Again, it was just the address that we had

18 of convenience.

19 Q. Did you have another address for the

20 Terramar Project back in 2014?

21 A. No.

22 Q. What about in 2015, did it have any other

23 addresses?

24 A. No.

25 Q. Did it have any other places of business?

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A. No.

Q. Directing your attention to the second page of this document. Again, are the officers of the Terramar Project listed on this page?

A. Yes.

Q. Are you listed working 60 hours a week for the Terramar Project?

A. Yes.

Q. Was there a 2015 Tax Return filed for the Terramar Project?

A. I'm sure there was.

Q. Do you know where that?

A. I am sorry, I don't.

Q. Was it filed with New York State?

A. It would have been filed with whatever was compliant and necessary for the paperwork.

Q. Other than for generalities, do you know where that tax return is?

A. No, I don't.

Q. Do you know who prepared it?

A. I am sorry, I don't recall.

Q. Was the accountant that prepared it Mark, Paneth & Shron, LLP., 685 Third Avenue, New York, New York 100017, as indicated on Plaintiff's Exhibit

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GHISLAINE MAXWELL

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A. It may have been.

Q. Were they your accountants?

A. They were.

Q. Do they always file your personal tax returns and the tax returns for the Terramar Project?

A. They did.

Q. What about Ellmax, LLC., did they prepare or file those tax returns for you?

A. I believe they did.

Q. Did you sign all those tax returns yourself?

A. I did.

Q. On behalf of you personally, Ellmax, and the Terramar Project?

A. Yes.

Q. How did you first become aware of this accident?

A. I believe, as much as I can recall, somebody rang the doorbell. And I had heard somebody had alleged they fell outside on the sidewalk.

Q. Was that on September 9, 2015?

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GHISLAINE MAXWELL

A. I guess. I don't remember the date. But, yes.

Q. Did you answer the door yourself?

A. No.

Q. Who answered the door?

A. Either Maritsa or [REDACTED] One of them did.

Q. What did they tell you?

A. They told me that somebody alleged that they fell on the sidewalk.

Q. What did you do? Did you leave the house? Did you walk outside and check on the person and see what was going on?

A. No, I did not.

Q. Did you ever see the individual?

A. No. I believe by the time I knew about it, I think he had already gone or left.

Q. How much time was it that lapsed between the time they told you about it and when you went out?

A. I don't remember. I am sorry.

Q. Did you do any investigation yourself?

A. Did you go in and look at the alleged place where he fell afterwards subsequently.

Q. How did you know what the place was that

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GHISLAINE MAXWELL

you are saying that he complained of?

A. I think [REDACTED] mentioned to me where he or she had fallen or claimed to have fallen.

Q. Did [REDACTED] offer any medical attention or attention to him?

A. I don't know.

Q. Did she say whether she called an ambulance?

A. I don't think she did. I don't know. I think by the time she -- as much as I can recall there was an ambulance that was called. And I think she told me there was an ambulance that was called and that he was going away in an ambulance.

Q. Did you see the ambulance arrive?

A. No.

Q. Did you see him on the sidewalk after she told you about the accident?

A. No.

Q. After the accident occurred, did you or anybody on your behalf make any changes or repairs to the sidewalk in front of your home?

A. No.

MR. FALLEK: Can we have this collectively marked.

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(Whereupon, the copies of photographs from Plaintiff's Notice were received and marked as Plaintiff's Exhibits 13A through 13E for identification, as of this date, by the reporter.)

Q. Before we get to the photos. When did 116 East 65th Street sell the building at 116 East 65th Street?

A. It's a matter of record. You can check. I think it was in April of 2016. Is that right?

I'm sorry, I don't recall. Something like that. Whatever is the matter of record you will have it.

Q. I'm directing your attention to Plaintiff's Exhibit 5 for identification. Your own affidavit.

A. Yes.

Q. Does the affidavit indicate the date it was sold?

A. Yes.

Q. When was it sold?

A. April 14, 2016.

Q. How many was it sold for?

A. 15 million and 50,000. Something like that.

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GHISLAINE MAXWELL

Q. Before 116 East 65th Street purchased the building, did you have an engineer doing an inspection on the house and the exterior of the house?

A. Before I bought it?

Q. Yes.

A. Sorry, I don't recall.

Q. Did you inspect the condition of the sidewalk before you purchased it?

A. I don't recall looking at the sidewalk at all.

MR. CUOMO: Are you asking just if she inspected the sidewalk in 2000 before it was purchased?

MR. FALLEK: Yes. At that time.

A. I don't recall ever looking at the sidewalk.

MR. FALLEK: I'm going to show you what has been marked as Plaintiff's Exhibits 13A, B, C, D, and E.

MR. CUOMO: I'm just curious. I got your note with those photographs. Is there any indication when those photographs were taken?

MR. FALLEK: Not in what I have exchanged

1 GHISLAINE MAXWELL

2 with you, no. Off the record.

3 (A discussion was held off the record.)

4 Q. I just want you to take a look at the

5 pictures. Do you recognize what the building that

6 is shown in Plaintiff's Exhibit 13A?

7 A. This looks like 116 East 65th Street.

8 Q. Does that show the front of the building?

9 A. A little bit of the front of the building.

10 Q. Does it also show tree roots in the

11 building?

12 A. It does.

13 Q. Do you see the --

14 MR. CUOMO: Tree roots in the building?

15 MR. FALLEK: Yes, tree roots in front of

16 the building.

17 A. Yes. In this I do.

18 Q. Take a look at 13B. Do you recognize that

19 photo?

20 A. I haven't seen those photos.

21 Q. I understand.

22 A. What are you asking me --

23 Q. Do you recognize the upper portion of the

24 photo?

25 A. I do.

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GHISLAINE MAXWELL

Q. What does that show?

A. It shows the front entrance of 116.

Q. Directing your attention to the next photo 13C. Could you tell me what that shows?

A. It looks like the tree in front of Diandra's house.

Q. Does it also show the tree well or the metal gate around the tree?

A. I does.

Q. Was that metal grate around the tree was that changed or altered in any way from the time period you lived there?

A. I don't remember. I don't know. I don't know. I am sorry. I can't tell from this picture.

Q. Could you tell me what is shown in Plaintiff's Exhibit 13D?

A. It looks like a sidewalk with tree roots.

Q. Do you recognize the metal fence and grating?

A. I think that's the metal fence in front of 114 and 116 East 65th Street.

Q. Did you understand that to be what was the dividing line between the two properties?

A. Yes.

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GHISLAINE MAXWELL

Q. Do you recognize what is shown in the last photo marked as Plaintiff's 13E?

A. It's a tree well and tree roots.

Q. Is that the same tree well?

A. I don't know how to answer that. I can't tell.

Q. That's it. I just want to check my notes.

A. Could I take a look at this first?

Q. Sure.

MR. CUOMO: Check away.

Q. Back in 2015, did you have an office in place outside of 116 East 65th Street?

A. I didn't have an office at 116 East 65th Street. I have a place where I would sit with my computer. That's the same whether I am in a hotel room. I am mobile. Wherever I am is where I work.

MR. FALLEK: I will ask the question again.

If you could just answer.

Q. Did you maintain an office, a physical office, outside 116 East 65th Street, back in September of 2015?

A. No.

Q. Did you pay rent for any office outside of the building, 116 East 65th Street, to maintain an

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GHISLAINE MAXWELL

office?

A. No.

MR. FALLEK: I have no further questions.

MR. CUOMO: I just have a few.

EXAMINATION BY

MR. CUOMO:

Q. Afternoon Ms. Maxwell. How are you?

A. Good, thanks.

Q. Before it was mentioned that the house at 116 East 65th Street was designated as a two-family home.

A. I think in the paperwork it has two-family home.

Q. When it was purchased in 2000, do you recall if you purchased it using 116 East 65th Street, LLC.?

A. I believe I did.

Q. Were you the sole member of 116 East 65th Street, LLC.?

A. Yes.

Q. Were you advised either by a lawyer or an accountant to purchase the home through an LLC?

A. I don't recall, but I'm sure I was.

Q. At the time that the home was purchased,

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GHISLAINE MAXWELL

was it being used as a two-family home?

A. I don't recall.

Q. To your mind, was the home you had purchased was it set up as a two-family home?

A. No.

Q. Was it set up as a single-family home?

A. Yes.

Q. From that point in 2000 until you sold it, on April 14, 2016, did you use it as a one-family home?

A. Yes.

Q. You never rented out any portion of that home to any other family or any other resident?

A. No.

Q. Now, there was some discussion with an office in the house, as listed on the diagram, that was used to help sell the home. Do you recall that a few moments ago?

A. Yes.

Q. Was that office designated for use solely by either the Terramar Project or Ellmax?

A. No.

Q. Did that office exist in the home when you bought it?

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GHISLAINE MAXWELL

A. No.

Q. Did the room exist in the home?

A. Yes.

Q. At some point you put a desk and computer in there?

A. Yes.

Q. Prior to, say, 2010, did the office exist?

A. I think so.

Q. Prior to 2010 what did you use the office for?

A. It was the place where the dogs come to get fed, and where you could stage food and drinks for the garden.

Q. Were there any place in the home, at 116 East 65th Street, that was reserved for use by employees either by Ellmax or the Terramar Project?

A. No.

Q. Now, you mentioned that the Ellmax was dormant after 2013. What do you mean by dormant?

A. I wasn't performing any work.

Q. It was still an actual LLC?

A. Yes.

Q. Some time in 2017 you kind of woke it up just to dissolve it?

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GHISLAINE MAXWELL

A. Yes.

Q. Between 2013 and 2017, is it correct, that you did no business for the Ellmax, LLC.?

A. No.

Q. Between 2010 and 2013 when you did business with Ellmax, did any of your clients or potential clients ever come to the home to do business?

A. No.

Q. Did you ever entertain anybody from the general public with respect to Ellmax between 2010 and 2013 in the home?

A. No.

Q. Did Ellmax sell any products of any kind?

A. No.

Q. Did you ever offer for sale through Ellmax any products out of your home?

A. No.

Q. Was there any retail space in your home?

A. No.

Q. Was there any wholesale space in your home?

A. No.

Q. Between 2000 and 2016, when you sold the property, was it essentially a primary residence?

A. Yes.

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GHISLAINE MAXWELL

Q. When in town is that where you would sleep?

A. Yes.

Q. You had your master bedroom in the house at 116 East 65th Street?

A. Yes.

Q. That was all the time between 2000 thru 2016?

A. Yes.

Q. With respect to the Terramar Project, did you ever collect or have you ever collected any salary as the president of the Terramar Project?

A. No.

Q. Have you received any remuneration of any kind from the Terramar Project for your service for that not-for-profit entity?

A. No.

Q. Is there any place in the home, at 116 East 65th Street, that is set aside for use solely by the Terramar Project?

A. No.

Q. Did you ever take any tax deductions on your personal income taxes relative to a home office that was for use by Ellmax or the Terramar Project or any other commercial entity between 2010 and

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GHISLAINE MAXWELL

2015?

A. No.

Q. That office that we talked about off the garden, could you use that for any personal purpose?

A. Yes.

Q. If you wanted to sit down and type out a letter to somebody, could you use that office if it was a personal matter?

A. Yes.

Q. Were you restricted in anyway for using that small portion of your home for any personal issue?

A. No. It was where the dogs got fed. It was there all the time.

Q. I'm showing you Plaintiff's Exhibit 6. Do you recognize that photograph?

A. Yes.

Q. Does that photograph show portions of both 116 and 114 East 65th Street here in New York?

A. Yes.

Q. Does it show portions of the sidewalk that are in front of both 114 and 116 East 65th Street?

A. Yes.

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GHISLAINE MAXWELL

Q. Does it show a tree well and a metal guard around that tree well?

A. Yes.

Q. Is that tree well and that metal guard around that tree well predominantly in front of 114 East 65th Street?

A. Yes.

Q. At any time, from the year 2000 until you sold the property in April of 2016, did you contract for hire anyone to do any repairs to the sidewalk in front of 116 East 65th Street?

A. No.

Q. Mr. Fallek showed you a series of photographs marked as 13A through 13E depicting a sidewalk and some type of construction or repair. You have see those?

A. I did.

Q. At any time during your ownership or during the LLC's ownership of 116 East 65th Street, did you have any work done that would have resulted in photographs like this being taken?

A. No.

Q. Did the Terramar Project ever host any events or have any events at your home between when

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GHISLAINE MAXWELL

you started it up say in 2011 or whenever you started it up through April 14, 2017, when you sold the home?

A. No.

Q. Did you ever have any event where the general public was invited to the home for any purpose for the Terramar Project such as a fund raiser or anything like that?

A. No.

Q. With respect to Ellmax, I just want to make an understanding. Is it fair to say the business of Ellmax was you either attempting to place board members for companies or search for board members of companies or both?

A. Yes.

Q. Would you also, from time to time, attempt to source speakers for company functions?

A. Yes.

Q. You might also help them with the event planning and venue selection for a company?

A. I didn't do event planning.

Q. Venue selection perhaps?

A. Yes.

Q. When you worked for a particular company,

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GHISLAINE MAXWELL

did you work with them at their premises?

A. Yes.

Q. Did you ever had them come to your business, to 116 East 65th Street, to do that work?

A. No.

Q. During the period of time that Ellmax functioned, did it generate revenue?

A. A small amount.

Q. Did you ever collect a salary for Ellmax?

A. No.

Q. Were you ever disbursed any profits from Ellmax?

A. No.

Q. What happened to the revenue that Ellmax generated during that period of time, from 2010 to 2013?

A. It just was used to defer cost such as traveling and travel mostly.

Q. What were the costs of travel related to Ellmax where you were going?

A. Sorry, most of the companies I would have worked for were from Los Angeles. I went to LA and also to London multiple times.

Q. What was the reason you stopped working

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GHISLAINE MAXWELL

through or working as part of Ellmax in 2013?

A. It wasn't going to succeed and it was just useless. And I just stopped it.

Q. Ellmax between 2013 and the time you sold the home in 2016 it had no revenue?

A. No.

Q. It did not operate?

A. No.

Q. You listed the home at 116 East 65th Street as an address for both Terramar Project and Ellmax, correct?

A. Just as an address of convenience.

Q. Was that to receive mail?

A. Yes.

Q. To have an address for the tax return?

A. Yes, or whatever.

Q. Other than those purposes, did 116 East 65th Street serve any purpose for the operations of either Ellmax or the Terramar Project at any time between 2010 and 2016 when you sold the home?

A. It was just my home. It was just my home. That's where I stayed.

MR. CUOMO: No further questions.

MR. FALLEK: I have one more thing. If you

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GHISLAINE MAXWELL

could mark this.

(Whereupon, the Real Project Transfer was received and marked as Plaintiff's Exhibit 14 for identification, as of this date, by the reporter.)

EXAMINATION BY

MR. FALLEK:

Q. I will show you a document, which was marked as Plaintiff's Exhibit 14 for identification.

A. What is it?

Q. Is this the Real Property Transfer for the sale of 116 East 65th Street?

A. Real property transfer is -- I don't know.

MR. CUOMO: If you don't know, you don't know.

A. I'm sorry, I don't know. I have never seen this document.

Q. Did you attend the closing when you sold the building at 116 East 65th Street?

A. No.

Q. Did you authorize somebody to attend the closing for you?

A. Yes.

Q. Who was that?

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GHISLAINE MAXWELL

A. The lawyer that is on that. I don't remember his name. Monte Albers De Leon.

Q. Who is he? Is he your lawyer?

A. He was a lawyer that I used.

Q. Did you sign a Power Of Attorney permitting him to execute documents on your behalf?

A. I don't remember. I must have.

Q. Was the property sold to a Mr. Greenberg?

A. I'm sorry, I don't remember the name of the person who bought it. I'm sorry.

Q. Have you ever met Monte Albers De Leon?

A. I have.

Q. In what capacity?

A. He was a lawyer.

Q. Was he your lawyer for this matter?

(Continued on the next page for the jurat.)

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GHISLAINE MAXWELL

A. He was my lawyer for this matter.

MR. FALLEK: No further questions. Thank
you.

(Whereupon, the proceedings were concluded
at 11:47 a.m.)

GHISLAINE MAXWELL

Subscribed and sworn to
before me this ____ day
of _____, 2019.

Notary Public

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DEITZ Court Reporting... A Lexitas Company
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E X H I B I T S		
EXHIBIT	DESCRIPTION	PAGE
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DEITZ Court Reporting... A Lexitas Company
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April 9, 2019

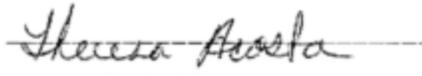
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C E R T I F I C A T I O N

I, Theresa Acosta, a Shorthand Reporter and Notary Public of the State of New York, do hereby certify;

That, GHISLAINE MAXWELL, the witness whose examination is hereinbefore set forth, was duly sworn, and that such examination is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.


THERESA ACOSTA

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