

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 [REDACTED]
[REDACTED] LLC,

Defendants,

INDEX NO.: 159225/2010

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

EXAMINATION BEFORE TRIAL of the Defendant,
[REDACTED] 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.

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

THE LAW OFFICE OF JOSEPH FALLEK

Attorney for Plaintiffs



New York, New York 10004

BY: LARRY FALLEK, ESQ.

CUOMO, LLC.

Attorney for Defendant



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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G H I S L A I N E M A X W E L L

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. [REDACTED] 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 [REDACTED] in Manhattan.

THE WITNESS: Okay.

MR. FALLEK: Before we start I have a few

1 GHSILAINE MAXWELL

2 basic rules I want to discuss with you. Please

3 make all your responses verbally. The Court

4 Reporter can't take down a shake or nod of the

5 head. Like you are doing right now.

6 THE WITNESS: Of course.

7 MR. FALLEK: Please say yes or no.

8 THE WITNESS: Yes.

9 MR. FALLEK: And try not to shrug your

10 shoulders or anything like that. Just make all

11 your response verbally.

12 THE WITNESS: I shall.

13 MR. FALLEK: Please let me finish my entire

14 question before you give an answer. The Court

15 Reporter cannot take us both down speaking at

16 the same time.

17 Q. Is that agreeable?

18 A. Yes.

19 MR. FALLEK: It's important that you stop

20 me if you don't understand a question. If you

21 do give an answer, I will assume that you

22 understand my question.

23 Q. Is that understood?

24 A. Yes.

25 Q. The address that you just gave the Court

1 GHISLAINE MAXWELL

2 Reporter, how long have you lived there?

3 A. '92, '93.

4 Q. Is that your primary residence at this

5 time?

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

7 Q. How many homes do you own back in September

8 of 2015?

9 A. Two.

10 Q. Where are those homes?

11 A. [REDACTED] and the one in London.

12 Q. When you say, "the one in London," you are

13 referring to the address that you just gave?

14 A. Yes.

15 Q. Is that a private home?

16 A. Yes.

17 Q. Is that home owned by you individually or

18 some other form?

19 A. It's owned by me.

20 Q. Is your name on the deed to that property

21 or the title of the property?

22 A. It was back then. I kind of -- it was up

23 until recently. I don't know. I can't remember

24 what it is now, if I changed it or not.

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

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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. [REDACTED]

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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2 those type of companies.

3 Q. Was the principal place of business of

4 Ellmax, LLC. at [REDACTED] New York, New

5 York?

6 A. It wasn't that specific. It was wherever I

7 was. Everything that is in my head is my contact,

8 my ideas.

9 Q. Specifically the document in front of you,

10 when you formed it, did you indicate that the

11 principal place of business was [REDACTED]

12 [REDACTED] New York, New York?

13 A. I think it was just filed there. It would

14 be easier for me other than any other reason.

15 Q. Did you sign the documents for the limited

16 liability company known as Ellmax, LLC.?

17 A. I'm sure I did with my lawyers. There was

18 no reason other than as an address of convenience.

19 MR. FALLEK: Move to strike the

20 nonresponsive portion.

21 THE WITNESS: I'm not trying --

22 MR. FALLEK: Just try focus on the question

23 that I'm asking you.

24 THE WITNESS: I'm not trying to be

25 evasive.

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2 Q. Who is [REDACTED]?

3 A. [REDACTED] my personal assistant.

4 Q. How long was [REDACTED] your personal assistant?

5 A. More than ten years.

6 Q. More than ten years from today?

7 A. No. [REDACTED] doesn't work for me anymore.

8 Q. When did you start working for you?

9 A. Again, some time in 2001, 2002. Something

10 like that.

11 Q. Was [REDACTED] your personal assistant for the

12 next ten years?

13 A. Yeah.

14 Q. Was [REDACTED] paid by Ellmax, LLC.?

15 A. I paid [REDACTED] myself.

16 Q. Did you pay [REDACTED] out of a different company

17 or different funds or what source?

18 A. I don't recall where I paid [REDACTED] from

19 exactly. [REDACTED] was not an employee of -- I was the

20 only person that did any work for Ellmax. [REDACTED] was

21 my personal assistant. [REDACTED] was able -- [REDACTED] would do

22 anything I would ask [REDACTED] to do as regards to my

23 travel, whatever. But [REDACTED] was -- [REDACTED] couldn't help

24 me with Ellmax. [REDACTED] didn't know people to place

25 them on board. If I directed [REDACTED] to get me on A

1 GHISLAINE MAXWELL

2 flight or something that may have been in relation

3 to business opportunity, [REDACTED] would do that.

4 Q. What is [REDACTED] current address?

5 A. I don't know.

6 Q. Do you know what state [REDACTED] lives in?

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

8 Q. Back in 2016, did she live at [REDACTED]

9 [REDACTED] New York, New York?

10 A. No.

11 Q. Where did she live in 2016?

12 A. Somewhere in [REDACTED]

13 MR. FALLEK: Directing your attention to

14 Plaintiff's Exhibit 2 for identification.

15 Q. Is that the 2015 Florida Limited Liability

16 Company for Ellmax, LLC.?

17 A. Again, I have not seen this before. I have

18 to take -- I haven't seen this before. So I'm

19 assuming that's what it is.

20 Q. Were regular annual reports filed by

21 Ellmax, LLC.?

22 A. Again, that would have been my accountant,

23 I would assume, would have a list of what is

24 expected or legally.

25 Q. Who was your accountant back then?

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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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2 A. Sorry.

3 Q. Plaintiff's 3 for identification, do you

4 recognize this to be the 2016 Florida Limited

5 Liability Company Annual Report for Ellmax, LLC.?

6 A. Again, I have never seen this. I will just

7 take your word that that's what that is.

8 Q. In 2016, was the principal place of

9 business for Ellmax, LLC. also listed as [REDACTED]

10 [REDACTED] New York, New York?

11 A. Again, that was the address of convenience.

12 The business is wherever I am, but yes.

13 MR. FALLEK: Move to strike the

14 nonresponsive portion of the answer.

15 Q. Did Ellmax, LLC. ever have a different

16 principal place of business?

17 A. I don't believe I had any other address of

18 convenience than the one it has listed.

19 MR. FALLEK: Move to strike as

20 nonresponsive.

21 Q. Is the answer no?

22 A. No.

23 Q. No it never had any other principal place

24 of business?

25 A. No.

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

3 A. It didn't have any assets.

4 Q. Who were the members of the limited

5 liability company?

6 A. I believe I was the sole member.

7 Q. Did Ellmax, LLC. have any employees?

8 A. No.

9 Q. I believe you said the last job you had was

10 for Ellmax, LLC.?

11 A. Last work that I did as you asked.

12 Q. Before you worked for Ellmax, LLC., whom do

13 you work for?

14 A. I was unemployed.

15 Q. During what period of time was that?

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

17 Q. When did you first move to the United

18 States to live here continuously?

19 A. 1991.

20 Q. Where did you live in 1991?

21 A. I was traveling around the states.

22 Q. Was [REDACTED] New York, New

23 York, the first residence that you had in the United

24 States?

25 MR. FALLEK: You seemed confused. I will

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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 [REDACTED] I believe, in 2000.

Q. Before [REDACTED] was purchased, did you form [REDACTED] [REDACTED] 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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2 Q. You said [REDACTED] was your personal assistant.

3 A. I did.

4 Q. Was that a remote job or did [REDACTED] live with
5 you or lived nearby?

6 A. [REDACTED] never lived in my home. I can't
7 recall. Wherever she lived I don't know. I'm
8 sorry.

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

10 A. It was full-time.

11 Q. How would you communicate with [REDACTED]?

12 A. Via, email, text, or phone.

13 Q. During what time period, if any, did [REDACTED]
14 live in New York?

15 A. I don't know if [REDACTED] lived in New York. [REDACTED]
16 worked for me, and [REDACTED] turned up for work for me.
17 But, I don't know where [REDACTED] lived.

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

20 A. No.

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

25 Q. Do you recognize this document to be a

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2 document from the New York State Department of State

3 regarding [REDACTED] LLC.?

4 A. I have never seen this document before.

5 Q. Could you please take a look at it.

6 MR. CUOMO: I think she has.

7 A. I've looked at it.

8 Q. Did you form [REDACTED] LLC.?

9 A. Yes.

10 Q. When was it formed?

11 A. Some time in 2000.

12 Q. Is that prior to the time that 116 East

13 65th Street was purchased?

14 A. I don't know the timing of it when it was

15 purchased. I don't know when the time was for the

16 creation of it and the purchase of the house. I'm

17 sorry.

18 Q. Is [REDACTED] a limited liability

19 company?

20 A. I believe so.

21 Q. Is it a New York Limited Liability Company?

22 A. I don't remember where it is limited. It

23 says, New York.

24 Q. Who are the members of that LLC?

25 A. I believe I'm the sole member.

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2 Q. Was there ever any other members?

3 A. I don't believe so.

4 Q. Could you tell me who Darren Indyke, Esq.

5 at [REDACTED] New York, New York is? Could

6 you tell me who he is?

7 A. He is a lawyer.

8 Q. What is his connection with the LLC?

9 A. He helped create it.

10 Q. Did you hire him to create it?

11 A. I don't recall how it went down exactly.

12 How he came to do it. But, he was the lawyer. And

13 he helped create it.

14 Q. Was he referred to you by somebody?

15 A. He worked for a friend of mine.

16 Q. Who is that?

17 A. A gentlemen called Mr. Epstein.

18 Q. Sorry?

19 A. A gentleman.

20 Q. Is that Jeffrey Epstein?

21 A. Yes.

22 Q. What was the principal place of business of

23 [REDACTED] LLC.?

24 A. Well, [REDACTED] didn't do any business.

25 Q. What was the principal place business? Do

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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 [REDACTED]

15 [REDACTED] LLC. purchased the building at [REDACTED]

16 [REDACTED] 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. [REDACTED] 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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2 any other years?

3 A. [REDACTED] worked. [REDACTED] was on call. [REDACTED] would

4 have done work from [REDACTED] home.

5 Q. What did [REDACTED] do for Ellmax, LLC.?

6 A. [REDACTED] didn't do any work for Ellmax. [REDACTED]

7 worked for me. [REDACTED] was my personal assistant. But

8 if I asked [REDACTED] to make a flight or something, then

9 it would have been.

10 MR. CUOMO: Just clarify. Are you asking

11 about 2017?

12 MR. FALLEK: Yes. She said added [REDACTED] in

13 2017 on Ellmax's payroll.

14 Q. Why did you add [REDACTED] to the payroll?

15 A. I misunderstood the question.

16 To shutdown the company. We restarted it

17 start to shut it down.

18 Q. Did [REDACTED] work for Ellmax prior to 2017?

19 A. No. [REDACTED] -- whatever -- Ellmax was dormant

20 from 2013 until I restarted to shut it down.

21 MR. FALLEK: Move to strike as not

22 responsive.

23 Q. You did file annual reports, did you not,

24 in 2014, '15, and '16 for Ellmax, LLC.?

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

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2 keep -- rather than going through the expense to

3 shut it down. It's expensive to shut it down.

4 Q. So the answer is: No, you did file them

5 all those year?

6 A. It was filed, but it was dormant.

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

8 A. I'm sure I did.

9 Q. What is the address at [REDACTED]

10 [REDACTED] Miami Beach, Florida 33139?

11 A. That was a home that I rented for a short

12 while, and I stayed at the address.

13 Q. When did you rent it?

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

15 Q. Was it in the year 2014.

16 A. I honestly don't remember.

17 MR. FALLEK: I'm showing you what was

18 marked as Plaintiff's Exhibit 1 for

19 identification, which it dates back to 2014.

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

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

22 Q. In the year 2015 the address changed, is it

23 not, to New York, New York?

24 A. It has.

25 Q. Do you know where the articles of an

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organization are for [REDACTED] 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 [REDACTED] 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 [REDACTED]?

A. I don't remember.

Q. Did you utilize the services of a broker when selling [REDACTED]?

A. I did.

Q. Was that Douglas Elliman?

A. It was.

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GHISLAINE MAXWELL

Q. How much did [REDACTED] LLC.
pay for the purchase of [REDACTED] in
Manhattan?

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

Q. Could you describe the building to me at
[REDACTED]?

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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1 G H I S L A I N E M A X W E L L

2 Q. Was this a limestone building?

3 A. Yes.

4 Q. Did it have an elevator?

5 A. Yes.

6 Q. Was there a separate entrance that the

7 building had? How many entrances did 116 East 65th

8 Street have?

9 A. Two.

10 MR. FALLEK: I will show you a document I

11 will have marked as Plaintiff's Exhibit 6.

12 (Whereupon, the copy of a photograph was

13 received and marked as Plaintiff's Exhibit 6 for

14 identification, as of this date, by the

15 reporter.)

16 Q. Do you recognize what is shown in

17 Plaintiff's Exhibit 6 for identification?

18 A. I do.

19 Q. What do you recognize that to be?

20 A. [REDACTED]

21 Q. Is that the building that was purchased by

22 [REDACTED] LLC.?

23 A. Yes.

24 Q. Does that document or that photograph

25 fairly and accurately show the way the building

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GHISLAINE MAXWELL

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 [REDACTED]

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?

April 9, 2019

1 GHISLAINE MAXWELL

2 tree?

3 A. No.

4 Q. Did you do anything or have anyone do

5 anything around the tree well?

6 A. Around Diandra's tree?

7 Q. Yes.

8 A. No.

9 Q. Did you ever discuss the tree with Diandra?

10 A. No.

11 Q. The sidewalk that is depicted in the

12 picture, were any changes made to that sidewalk by

13 you or anybody on your behalf during the time period

14 that 116 East 65th Street owned the premises?

15 MR. CUOMO: Hold on a second. From that

16 photograph can you tell?

17 MR. FALLEK: I'm not talking about that.

18 I'm just directing her to the sidewalk.

19 MR. CUOMO: Hear me out. I have a question

20 for you. Are you representing that all of the

21 sidewalk in that photograph depicted is Exhibit

22 6 is in front of [REDACTED] or are you

23 asking her part from that photograph in front of

24 [REDACTED]?

25 MR. FALLEK: Let's first ask about the

April 9, 2019

1 GHISLAINE MAXWELL

2 photograph.

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

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

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

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

13 MR. FALLEK: The sidewalk in the
14 photograph.

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

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

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

23 Q. Do you remember when that was?

24 A. I don't.

25 Q. Was it before September 9, 2015?

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GHISLAINE MAXWELL

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 [REDACTED]

A. [REDACTED] 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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GHISLAINE MAXWELL

A. No.

Q. Who lived in [REDACTED] 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. [REDACTED]

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

April 9, 2019

1 GHISLAINE MAXWELL
2 MR. FALLEK: Yes, back in September of
3 2015.
4 A. That's how I answered your question.
5 Q. [REDACTED] worked for you five days back then?
6 A. Yes.
7 Q. What were [REDACTED] duties and responsibilities?
8 A. [REDACTED] was my housekeeper. So [REDACTED] would keep
9 the house clean, and [REDACTED] would do the laundry. And
10 [REDACTED] would Hoover. [REDACTED] would help me cleanup in the
11 kitchen after I made a mess.
12 MR. CUOMO: I have to break in there.
13 (A discussion was held off the record.)
14 Q. Who was responsible to take care of the
15 outside of the home specifically the sidewalk in
16 front of your home?
17 A. I don't. But, I didn't designate anybody
18 to clean the sidewalk or whatever.
19 Q. Did somebody maintain the sidewalk in front
20 of the home back in 2015?
21 A. No.
22 Q. Who would sweep the sidewalks?
23 A. I don't know.
24 Q. If there was snow, who would shovel the
25 sidewalk?

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GHISLAINE MAXWELL

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.

April 9, 2019

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GHISLAINE MAXWELL

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 [REDACTED] [REDACTED] 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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GHISLAINE MAXWELL

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

1 GHISLAINE MAXWELL

2 that entrance?

3 A. I don't think so.

4 Q. What about for the front door, the door

5 that is shown in Exhibit 6 for identification?

6 A. There was a buzzer for that door.

7 Q. How many buzzers were there?

8 A. Just one I think.

9 Q. Where would it buzz in the interior --

10 A. Buzz to the telephone.

11 Q. To the telephone?

12 A. Yes.

13 Q. Where is the telephone kept?

14 A. Telephone everywhere. All the telephones

15 would go. You couldn't fail to hear the doorbell.

16 Q. Who would answer the door? Would that be

17 you or someone else?

18 A. Whoever got to it first.

19 Q. Who would that be? Would you say [REDACTED]

20 A. Typically me or [REDACTED] or [REDACTED] whoever.

21 Q. Were there times when [REDACTED] was in the house

22 back in September of 2015?

23 A. Yes.

24 Q. What about in August of 2015, were there

25 also times where [REDACTED] would be in the house?

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GHISLAINE MAXWELL

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, [REDACTED] 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.

April 9, 2019

1 GHISLAINE MAXWELL

2 Q. What is here generally?

3 A. Sorry.

4 Q. What is depicted in the diagram?

5 A. The house.

6 Q. Does it fairly and accurately show the

7 layout of the house, [REDACTED]

8 A. Yes.

9 Q. Did the home have an office in it?

10 A. It was called an office.

11 Q. How big was that area labeled as an

12 office?

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

14 8 feet 3 inches.

15 Q. Were there computers kept in that office?

16 A. There was a computer in that office.

17 Q. What kind of computer was it?

18 A. I think it was a Mack.

19 Q. Was it a laptop or desktop?

20 A. I think it was a desk top. It could have

21 been a laptop. I don't know.

22 Q. Who owned that desktop?

23 A. Well, if it was a desk top it would have

24 been me. Actually I think it was laptop in 2015.

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

1 GHISLAINE MAXWELL

2 back in 2015?

3 A. I didn't have business records.

4 Q. Where did you keep the records for Ellmax,

5 LLC.?

6 A. I use to move my -- I had a file cabinet

7 wherever I was sitting. I had a filing cabinet.

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

9 the building?

10 A. It moved. I frequently moved my desk. I

11 couldn't decide where I would sit. There was a

12 period of time in the dining room became a place

13 where I would sit and the library. When I moved my

14 desk my little filing system cop come with me.

15 Q. Did you conduct business out of [REDACTED]

16 [REDACTED]

17 A. No.

18 Q. Where did you conduct any business for

19 Ellmax, LLC.?

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

21 office.

22 Q. Tell me about your Terramar Projects?

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

24 Q. When did you form the Terramar Project?

25 A. I think it was in 2011 or 2012.

April 9, 2019

1 G H I S L A I N E M A X W E L L
2 Q. That would be have been before September 9,
3 2015?
4 A. Yes.
5 Q. Who is the president of the Terramar
6 Project, Inc.?
7 A. I am.
8 Q. Is that a New York Corporation?
9 A. I don't remember where it was filed. If
10 you have the paperwork in front of you and it says
11 New York then yes.
12 MR. FALLEK: I will show you a document
13 marked as Plaintiff's Exhibit 10. Let's mark it
14 first.
15 THE WITNESS: Could I use the bathroom?
16 MR. FALLEK: Yes. Whenever you need a
17 break just ask.
18 (Whereupon, the 2012 tax document was
19 received and marked as Plaintiff's Exhibit 10
20 for identification, as of this date, by the
21 reporter.)
22 (A short recess was taken.)
23 MR. FALLEK: I will show you what was
24 marked as Plaintiff's Exhibit 10 for
25 identification.

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GHISLAINE MAXWELL

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.

1 GHISLAINE MAXWELL

2 Q. Is that accurate?

3 A. I'm sure it is.

4 Q. Who are the other people that you have

5 listed?

6 A. Larry Kevin.

7 Q. Who was he?

8 A. He was the director.

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

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

11 week.

12 Q. What did he do for the Terramar Project?

13 A. He gave advise as to how to best practices

14 for charity.

15 Q. What about Ariadne Calvo-Platero, what did

16 that person do?

17 A. She again gave advise as to how far

18 Terramar could realize its goals.

19 Q. Are there any other employees for the

20 Terramar Project that are not listed on the tax

21 return?

22 A. The Terramar Project didn't have any

23 employees.

24 Q. These are merely the officers of the

25 company?

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GHISLAINE MAXWELL

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 [REDACTED] [REDACTED] 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 [REDACTED] [REDACTED] New York, New York?

A. Yes.

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

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

A. These are just all directors and none of

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

8 Q. Who was that?

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

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

16 A. There were, yes.

17 Q. Who were they?

18 A. One. I believe it was Robert Foos.

19 Q. In what position did he hold?

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

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

25 A. Yes.

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GHISLAINE MAXWELL

MR. FALLEK: Mark this.

(Whereupon, the 2014 Tax Return was received and marked as Plaintiff's Exhibit 12 for identification, as of this date, by the reporter.)

MR. FALLEK: I will show you what was marked as Plaintiff's Exhibit 12 for identification.

Q. I'm asking you if you recognize this to be the 2014 Tax Return for Terramar Project?

A. Again, I have not seen this document, but actually it seems to be as you described it.

Q. At that time the principal place of Terramar Project was at [REDACTED] New York, New York?

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

Q. Did you have another address for the Terramar Project back in 2014?

A. No.

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

A. No.

Q. Did it have any other places of business?

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GHISLAINE MAXWELL

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., [REDACTED] New York, New York 100017, as indicated on Plaintiff's Exhibit

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GHISLAINE MAXWELL

10?

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?

1 GHISLAINE MAXWELL
2 you are saying that he complained of?
3 A. I think [REDACTED] mentioned to me where he or
4 she had fallen or claimed to have fallen.
5 Q. Did [REDACTED] offer any medical attention or
6 attention to him?
7 A. I don't know.
8 Q. Did [REDACTED] say whether she called an
9 ambulance?
10 A. I don't think she did. I don't know. I
11 think by the time she -- as much as I can recall
12 there was an ambulance that was called. And I think
13 [REDACTED] told me there was an ambulance that was called
14 and that he was going away in an ambulance.
15 Q. Did you see the ambulance arrive?
16 A. No.
17 Q. Did you see him on the sidewalk after she
18 told you about the accident?
19 A. No.
20 Q. After the accident occurred, did you or
21 anybody on your behalf make any changes or repairs
22 to the sidewalk in front of your home?
23 A. No.
24 MR. FALLEK: Can we have this collectively
25 marked.

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1 GHISLAINE MAXWELL

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

7 Q. Before we get to the photos. When did [REDACTED]
8 [REDACTED] sell the building at [REDACTED]
9 [REDACTED]?

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

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

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

17 A. Yes.

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

20 A. Yes.

21 Q. When was it sold?

22 A. April 14, 2016.

23 Q. How many was it sold for?

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

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GHISLAINE MAXWELL

Q. Before [REDACTED] 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

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GHISLAINE MAXWELL

with you, no. Off the record.

(A discussion was held off the record.)

Q. I just want you to take a look at the pictures. Do you recognize what the building that is shown in Plaintiff's Exhibit 13A?

A. This looks like 

Q. Does that show the front of the building?

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

Q. Does it also show tree roots in the building?

A. It does.

Q. Do you see the --

MR. CUOMO: Tree roots in the building?

MR. FALLEK: Yes, tree roots in front of the building.

A. Yes. In this I do.

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

A. I haven't seen those photos.

Q. I understand.

A. What are you asking me --

Q. Do you recognize the upper portion of the photo?

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 [REDACTED] and [REDACTED]

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 [REDACTED]

A. I didn't have an office at [REDACTED]

[REDACTED] 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 [REDACTED] back in September of 2015?

A. No.

Q. Did you pay rent for any office outside of the building, [REDACTED] 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
[REDACTED] 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 [REDACTED]
[REDACTED]

A. I believe I did.

Q. Were you the sole member of [REDACTED]
[REDACTED]

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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1 GHISLAINE MAXWELL
2 was it being used as a two-family home?
3 A. I don't recall.
4 Q. To your mind, was the home you had
5 purchased was it set up as a two-family home?
6 A. No.
7 Q. Was it set up as a single-family home?
8 A. Yes.
9 Q. From that point in 2000 until you sold it,
10 on April 14, 2016, did you use it as a one-family
11 home?
12 A. Yes.
13 Q. You never rented out any portion of that
14 home to any other family or any other resident?
15 A. No.
16 Q. Now, there was some discussion with an
17 office in the house, as listed on the diagram, that
18 was used to help sell the home. Do you recall that
19 a few moments ago?
20 A. Yes.
21 Q. Was that office designated for use solely
22 by either the Terramar Project or Ellmax?
23 A. No.
24 Q. Did that office exist in the home when you
25 bought it?

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

A. Yes.

Q. You had your master bedroom in the house at



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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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 [REDACTED] and [REDACTED] Street here in New York?

A. Yes.

Q. Does it show portions of the sidewalk that are in front of both [REDACTED] and [REDACTED]

A. Yes.

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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 [REDACTED]

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 [REDACTED] 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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2 you started it up say in 2011 or whenever you

3 started it up through April 14, 2017, when you sold

4 the home?

5 A. No.

6 Q. Did you ever have any event where the

7 general public was invited to the home for any

8 purpose for the Terramar Project such as a fund

9 raiser or anything like that?

10 A. No.

11 Q. With respect to Ellmax, I just want to make

12 an understanding. Is it fair to say the business of

13 Ellmax was you either attempting to place board

14 members for companies or search for board members of

15 companies or both?

16 A. Yes.

17 Q. Would you also, from time to time, attempt

18 to source speakers for company functions?

19 A. Yes.

20 Q. You might also help them with the event

21 planning and venue selection for a company?

22 A. I didn't do event planning.

23 Q. Venue selection perhaps?

24 A. Yes.

25 Q. When you worked for a particular company,

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did you work with them at their premises?

A. Yes.

Q. Did you ever had them come to your business, to [REDACTED] 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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2 through or working as part of Ellmax in 2013?

3 A. It wasn't going to succeed and it was just

4 useless. And I just stopped it.

5 Q. Ellmax between 2013 and the time you sold

6 the home in 2016 it had no revenue?

7 A. No.

8 Q. It did not operate?

9 A. No.

10 Q. You listed the home at [REDACTED]

11 as an address for both Terramar Project and Ellmax,

12 correct?

13 A. Just as an address of convenience.

14 Q. Was that to receive mail?

15 A. Yes.

16 Q. To have an address for the tax return?

17 A. Yes, or whatever.

18 Q. Other than those purposes, did [REDACTED]

19 [REDACTED] serve any purpose for the operations of

20 either Ellmax or the Terramar Project at any time

21 between 2010 and 2016 when you sold the home?

22 A. It was just my home. It was just my home.

23 That's where I stayed.

24 MR. CUOMO: No further questions.

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

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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 [REDACTED]

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 [REDACTED]

A. No.

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

A. Yes.

Q. Who was that?

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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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E X H I B I T S

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2	Document dated 2-23-15	13
3	Document dated 3-22-16	13
4	Document dated 4/5/19	22
5	Affidavit	27
6	Copy of a photo	34
7	Copy of a photo	42
8	A draft	46

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9	A draft	46
10	2012 tax document	51
11	2013 tax document	54
12	2014 tax document	56
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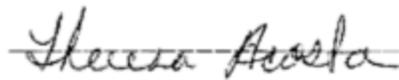
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C E R T I F I C A T I O N

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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