

- ■■■■
- We have never met before, right?
  - This is our first time speaking, right?

#### Past Statements about Epstein/Maxwell

- You testified earlier that you first went to Epstein's house in Palm Beach when you were 14 years old, right?
- And you went with ■■■■ ■■■■, right?
- And when you got there, you say that you saw Ms. Maxwell?
- And you said that Ms. Maxwell told ■■■■ to tell you what to do, right?
- But Ms. Maxwell didn't say more than that, right?
- She didn't go upstairs with you, right?
- She wasn't there when you left, right?
- She didn't pay you, right?
- You didn't see her again during that first visit, right?
- You testified on direct that you went to Epstein's house in Palm Beach to provide him with sexualized massages over 100 times?
- And during those 100 times, you rarely saw Ms. Maxwell, right?
- And it was almost always just you and JE in the room alone together, right?
- Ms. Maxwell wasn't in the room, right?
- She never was present for any sexual encounters you had with Epstein, right?
- You testified that both Maxwell and a woman named ■■■■ called to schedule appointments to massage JE, right?
- It was almost always ■■■■, right?
- You went to Epstein's house for years, right? From when you were 14 to 18 years old?
- And your testimony today is that you saw Ms. Maxwell around the house in the first several months, right?
- And then she wasn't around, right?
- She never picked you up and brought you to his house, right?
- You testified that you brought girls to JE's house? Who did you bring to his house? When did you bring them? [After the time when you stopped seeing Ms. Maxwell at the house, right?]
- You testified earlier about your date of birth, ■■■■, right? When you met ■■■■, you told him you were 16 years old, right? But you were actually 13 or 14 years old?
- So you lied to ■■■■ about your age, right?
- When you were 14 years old, when you met ■■■■, you had big breasts, right?
- You looked older than 14 years old, right?
- You looked around 18 years old, right?

## Differences Across Interviews

- Do you remember when you met with AUSA [REDACTED] and the FBI agents that they would ask you questions and you would give answers to those questions?
- Do you remember that they would take down notes of things you said?
- [REDACTED]
- In July 2020, you told the Government that Maxwell had given you a message, right?
- You testified earlier about giving a massage to one of Epstein's friends, right? You told the Government previously that Epstein set up the massage, right? But you testified today that Maxwell set it up, right?
  - Which one is it?
  - In July 2020, you told the Government that [REDACTED], right? You testified today that [REDACTED], right? Which is it?
- Testified earlier that GM was in touch with you and calling you and making appointments for [REDACTED] years. Previously told gov't that GM was in touch with you and making appointments for [REDACTED] months? Other times told them GM was in touch with you for [REDACTED] months?
  - Which is? What you said [REDACTED]
- Testified that [REDACTED] came in a package, right?
  - But when met with Gov't you told them that Epstein gave you the [REDACTED], right?
  - Which is it?
- You can't remember details from meeting to meeting in last year, right?
- But expect jury to believe remember things with precise detail that you didn't report for 20 years?
- Never went to law enforcement when happening? Never spoke to prosecutor's office when happening, right?
- Not only didn't you tell police, but you didn't tell people closest to you, right?
- Didn't tell your mom, right? You lied to her, right?
- And even when you first spoke to law enforcement about JE, you didn't mention GM, right?
- You get premonitions, right? Like strong feelings or senses of when things are happening, right?
- You are certain that the clocks in the massage room had cameras, right?
  - So if no camera in clocks, your memory can't be trusted, right?
- And the FBI was always watching the house when you went there, right?
  - So if FBI was not across street watching, means your memory can't be trusted, right?

- And testified earlier that you saw photos of Maxwell pregnant, right? Photographs of the woman sitting in front of you pregnant, right? In the house, right? My client, right?
  - So if she was never pregnant, means your memory can't be trusted, right?

#### Substance Abuse Issues

- [REDACTED]
- At the time that you testified that you were going to Epstein's house in Palm Beach, you were using drugs, right? [Which drugs?]  
[REDACTED]
- You were addicted to drugs, right?
- You were addicted to the drugs at the time you were going to Epstein's house in Palm Beach?
- You were high when you were at Epstein's house, right?
- You took drugs before you went to his house, right?
- And you've struggled with drug use since then, right?
- Addicted to drugs for years, right? More than 1 year, right? More than 5 years, right? More than 10 years right?
- Lot of people there, right?
- Dealt with multiple people?
- Interactions brief?
- At the time you were going to JE's house, you were dating [REDACTED], right? He wanted you to go to the house, right? So you could make money and buy drugs?
- You were both using drugs then, right?
- You've continued to struggle with addiction, right?
- You've had relapses, right? Cocaine, right? Other substances?
- You also take Xanax, right? What for?
- And Doxepin, right? What for?
- Also use marijuana, right? When last use?
- You take methadone, right?
- You take methadone to help with your drug addiction, right?
- And you have been taking methadone for at least eight years, right?
- Methadone can have long-term impacts on memory, right?
- Did you take methadone today? Yesterday? The day before?
- Now I'm sorry to ask about this, but I have to. You also have a variety of mental health issues, right?

- [REDACTED]
- [REDACTED]
- [REDACTED]

- [REDACTED]
- Even today right now, you have days and moments where you hear things that aren't there?

Arrests/Convictions

- [REDACTED]
- [REDACTED]
- [REDACTED]
  - You represented X box to be yours, right? But it wasn't, right?
  - You were willing to lie to get money for the X box, right?

- [REDACTED]
- You've gone through some difficult experiences in your life, right?
- You've been [REDACTED], right? [REDACTED], right?
- You have a complicated relationship with [REDACTED], right?
- [REDACTED]
- He treated you poorly, right?
- He was sneaky, right?
- A liar, right?
- [REDACTED] has used a lot of drugs over the years, right? Which drugs that you know of?
- When you were 13 years old [REDACTED], right? [REDACTED]
- [REDACTED]
- When you were 13 years old, [REDACTED] t [REDACTED]

Time lapse in coming forward

- You were interviewed first interviewed by the FBI in 2007, right?
- And during that interview you told the FBI about Jeffrey Epstein, right?
- You told the FBI about massaging Epstein, right?
- You told the FBI about a woman named [REDACTED], right?
- You told them that [REDACTED] called you to schedule massages, right?
- You told them that [REDACTED] photographed you nude, right?
- You didn't say anything about Maxwell then, right?
- And about 13 years later that's when you first came forward with information about Maxwell, right?

- And you've had time to think about Maxwell since you started meeting with AUSA [REDACTED], right?
- And now you've just started to miraculously remember details about Maxwell, right?
- You came forward when the case was public and in news, right?
- Around that time that you came forward, you put in a claim for a victim compensation fund run by Jeffrey Epstein's estate and got millions of dollars? [REDACTED] dollars, right?
- What have you done with that money?
- Give some to [REDACTED]? [REDACTED]?
- This trial is just another opportunity for you to make more money off of this?
- You never mentioned anything about Maxwell until she was already indicted, right?
- Enough for you to go after Epstein?
- But not going to go after the defendant to get money?
- Gov't has been good to you right, pay for family to travel to NY? Agreed to testify to get a paid vacation from the Gov't, right?

#### Lies under Oath

- You testified that you [REDACTED] Epstein back in [REDACTED], right?
- You were deposed, right? Meaning Epstein's lawyers asked you questions, right?
- You were asked questions under oath, right?
- You testified earlier that when you were deposed, you said you didn't get paid for sex acts when you worked for the escort service, right?
- And you said that was a lie, right?
- And you said that under oath, right?
- Just like you are under oath today, right?
- Now you sued Epstein, right? Also sued [REDACTED], right?
- But didn't [REDACTED] back in [REDACTED]?
- You testified on direct that you didn't [REDACTED] her b/c you didn't know you were allowed to [REDACTED] her, right?
- But you could [REDACTED] Epstein? And you could [REDACTED]?
- But it's because GM wasn't important, right?
  - You testified earlier that GM wasn't important, right?

#### Prep

- AUSA [REDACTED] asked you questions – not the first time you had heard some of those questions
- You had heard a lot of them before, right?
- Most of them?

- AUSA ██████ heard your answers, too, right?
  - And she gave you feedback on how to answer questions, right?
  - Fair to say that a lot of what happened on direct was not a surprise
  - You knew what to expect
  - You had prepared
  - You practiced what you were going to say, right?
  - Sometimes, when AUSA ██████ didn't like an answer you gave, she would stop and discuss what else you might say right?
  - You met with the government before testifying here today, right?
  - How many times?
  - Once? More than once? More than 5 times?
  - How long was each meeting?
  - Fair to say, you spent hours rehearsing your testimony here today
  - Now, you first spoke to AUSA ██████ in the summer of ██████ right?
  - Ms. Maxwell was already indicted, right?
  - The government was focused on building a case against my client, right?
  - Well, they asked you questions about my client, right?
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- You've met with AUSA ██████ and the FBI several times, right? Over that time, you've formed a pretty close relationship, right?
  - You really want to help the Government today, don't you?
  - You would like the defendant to go to jail, wouldn't you?