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<p>1 Deposition of LARRY EUGENE MORRISON 2 October 6, 2009 3 4 THE REPORTER: Do you swear the testimony 5 you're about to give will be the truth, the 6 whole truth, and nothing but the truth so help 7 you God? 8 THE WITNESS: So help me God. 9 ----- 10 LARRY EUGENE MORRISON, having been first 11 duly sworn, was examined and testified as 12 follows: 13 DIRECT EXAMINATION 14 BY MR. EDWARDS: 15 Q. Tell us your name. 16 A. Larry Morrison. 17 Q. And, Larry, where are you employed right now? 18 A. For JEJE. 19 Q. What's JEJE mean? 20 A. It's the aviation flight department for 21 Mr. Epstein, and my primary job is Dankjold Reed 22 Aviation. 23 MR. REINHART: Spell it. 24 A. D-A-N-K-J-O-L-D, and then the second word 25 is Reed, R-E-E-D, Aviation. It's a corporate flight</p>	<p>1 You know, it was a business decision made somewhere. 2 Q. What does the company do? 3 A. What? The company? It's just a holding 4 company, I think, for the aircraft. It's not -- I 5 don't believe it to be a money making company or a 6 real corporation. 7 Q. You're saying "for the aircraft." I'm 8 interpreting that to mean you're talking about one 9 aircraft. 10 A. Correct. 11 Q. Does that mean there's one or there's more 12 than one? 13 A. There's more. He owns more than one, but 14 just one is JEJE or -- 15 Q. And the aircraft that he owns, how many of 16 those do you either service and/or ride on? 17 A. I used to. I haven't been -- Actually, I 18 stepped back from being physically involved, just - 19 now I just do paperwork - and it was February of 20 2007. So I haven't actually physically been on the 21 airplanes other than I will take the Boeing for 22 maintenance. 23 Q. Since it seems like we've kind of skipped 24 ahead from 2001 to 2007, am I right that your first 25 involvement with Jeffrey Epstein of any way, shape, or</p>
<p>1 department. 2 Q. What do you do for him? 3 A. Director of Maintenance. 4 Q. Okay, so you maintain his planes -- 5 A. Correct. 6 Q. -- should something go wrong? 7 A. Correct. Yes. Yep. 8 Q. Do you also -- 9 A. For maintenance. 10 Q. Do you also fly on his planes? 11 A. On Mr. Epstein's? 12 Q. Yes. 13 A. I used to. I was a flight engineer -- 14 Q. Okay. What -- 15 A. -- on his 727. 16 Q. When you list your company - JEJE? 17 A. Yes. Yeah, it's just initials. It's an 18 LLC or holding company. 19 Q. How long has that holding company been around, 20 if you know? 21 A. Since -- I think it was developed when I 22 came with the airplane - 2001. 23 Q. Whose idea was it for that to come about - was 24 it yours? Was it his? 25 A. Oh, no, no, somewhere -- It wasn't mine.</p>	<p>1 form was 2001? 2 A. That's correct, yeah. 3 Q. You didn't meet him before that. 4 A. I had met him. He was a -- He was an 5 associate of my previous boss. 6 Q. Who's that? 7 A. Mr. Wexner. 8 Q. Leslie Wexner? 9 A. Yes. 10 Q. How do you know Leslie Wexner? 11 A. I worked for Limited Stores for 12 years. 12 Q. Doing what? 13 A. Essentially the same thing - aircraft 14 maintenance for their corporate flight department and 15 flight engineering on the 727. 16 Q. How many aircraft did Leslie Wexner have? 17 A. Well, none that I know that he had 18 personally, but the corporation had - the flight 19 department operated - we had three Gulfstreams, two 20 Hawkers, and a 727. 21 Q. What was the name of his corporation that 22 maintained the aircraft? 23 A. For Limited Stores? 24 Q. Yes. 25 A. It was just -- It was called Limited -</p>

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<p>1 Limited Flight Department.</p> <p>2 Q. And do you know him personally then - Leslie</p> <p>3 Wexner?</p> <p>4 A. Yeah, I had met him, of course, you know.</p> <p>5 I met him. I used to do aircraft completions for</p> <p>6 him, so which would involve personal meetings.</p> <p>7 Q. When did you first meet Leslie Wexner?</p> <p>8 A. 1988 was when I hired on, so I don't</p> <p>9 remember the month.</p> <p>10 Q. How did you get that job?</p> <p>11 A. Through word of mouth and, you know, I</p> <p>12 worked - I lived in - been in aviation for years in</p> <p>13 Columbus.</p> <p>14 Q. Well, I mean, Leslie Wexner's an important</p> <p>15 person, right? I mean, he --</p> <p>16 A. Correct.</p> <p>17 MR. GOLDBERGER: Form.</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. He's somebody who owns - my understanding -</p> <p>20 Limited, Victoria's Secret?</p> <p>21 A. Well, he doesn't own them. He's Chairman,</p> <p>22 you know.</p> <p>23 Q. Chairman of --</p> <p>24 A. Yeah. He doesn't personally own it. It's</p> <p>25 a publicly held company.</p>	<p>1 Q. Yes.</p> <p>2 A. Aircraft technician.</p> <p>3 Q. Which entails what?</p> <p>4 A. Maintenance of any or all of the aircraft</p> <p>5 operated by the flight department and some flight</p> <p>6 mechanic duties.</p> <p>7 Q. What kind of airplanes?</p> <p>8 A. Gulfstreams, Hawkers.</p> <p>9 Q. How big is the Gulfstream?</p> <p>10 A. Fifteen passenger - 15 to 17.</p> <p>11 (Mr. Goldberger exited.)</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. What did Wexner use the Gulfstream for?</p> <p>14 A. They were division airplanes, mostly.</p> <p>15 Q. And the other airplane you named - what did he</p> <p>16 use that for?</p> <p>17 A. Same, same.</p> <p>18 Q. Any idea why he had two planes?</p> <p>19 A. Well, I mean, yeah, we used them - they're</p> <p>20 a tool. It wasn't him. It was a large Fortune 500</p> <p>21 company. They use them as tools to -- You know,</p> <p>22 Limited has control over 60 percent of their</p> <p>23 manufacturing processes, plus, you know, what, 1200</p> <p>24 stores, or whatever, throughout all their divisions.</p> <p>25 I mean, when you say "Limited," it's not</p>
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<p>1 Q. Where were you prior to any involvement with</p> <p>2 Leslie Wexner?</p> <p>3 A. I worked for Red Roof Inn True Sports</p> <p>4 Flight Department.</p> <p>5 Q. How did that position lead you to Leslie</p> <p>6 Wexner?</p> <p>7 A. Well, it was always known that Limited</p> <p>8 Flight Department was one of the best jobs in</p> <p>9 Columbus and, actually, several other people that</p> <p>10 were already there knew me from previous jobs and</p> <p>11 education - we went through aircraft mechanic, or A&amp;P</p> <p>12 school, together - so when the position became</p> <p>13 available they pointed to me and - absolutely. It</p> <p>14 was a fine organization.</p> <p>15 Q. So did Mr. Wexner approach you or did you</p> <p>16 apply to him or how did that work?</p> <p>17 A. Oh, no, no, no. It's -- No. He wouldn't</p> <p>18 be involved in that type of activity. You apply to</p> <p>19 H.R. and you interview with the Director of</p> <p>20 Operations or the Chief Pilot. You know, he</p> <p>21 wouldn't.</p> <p>22 Q. So you start with Wexner in 1988.</p> <p>23 A. Yes.</p> <p>24 Q. What do you do for him then?</p> <p>25 A. What did I do for him?</p>	<p>1 just Limited, it's Victoria's Secret and it was</p> <p>2 Express and Lerner's and Henri Bendel's and all of</p> <p>3 that back then, so, I mean --</p> <p>4 Q. So --</p> <p>5 A. -- we moved a lot of passengers to keep</p> <p>6 those stores for the retail business.</p> <p>7 Q. And by "passengers," do you also mean clients</p> <p>8 of his?</p> <p>9 A. That I don't know. No. Mostly we just</p> <p>10 dealt with upper echelon, you know, people in the</p> <p>11 retail businesses from --</p> <p>12 Q. Such as whom?</p> <p>13 (Mr. Goldberger entered.)</p> <p>14 A. Can't even remember names, but it would be</p> <p>15 -- We would take buyers to Europe in the spring and</p> <p>16 fall. They would buy samples and bring them back to</p> <p>17 analyze for marketing. We would hire -- We would --</p> <p>18 Division heads, when they would do store shops and,</p> <p>19 Real Estate, we take Real Estate out when they were</p> <p>20 looking for new real estate.</p> <p>21 Q. While you were working back in '88 -- Well,</p> <p>22 how long overall did you work with Leslie Wexner and/or</p> <p>23 his companies?</p> <p>24 A. Well, '88 through when I came here in</p> <p>25 January of '01.</p>

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<p>1 Q. Why the change?</p> <p>2 A. It offered an opportunity -- Well, one was</p> <p>3 I enjoyed flying - and the 727 was being replaced by</p> <p>4 a BBJ, which is a two-man airplane, not a three-man</p> <p>5 airplane - three-pilot airplane - and it gave me the</p> <p>6 opportunity to become a Director of Maintenance, and</p> <p>7 it was a challenge. You know, bringing - upstarting</p> <p>8 an airliner on a private ticket or a VIP ticket is</p> <p>9 really challenging, and I enjoy the challenge of</p> <p>10 working and developing the program and stuff.</p> <p>11 Q. Well, my understanding, Leslie Wexner is</p> <p>12 generally - he's in Ohio, right?</p> <p>13 A. No, he's got other places. I mean -- No,</p> <p>14 he's like anyone, he's - in his category - he's got</p> <p>15 multiple homes and --</p> <p>16 Q. Well, when you would maintain his aircraft,</p> <p>17 would that be in Ohio --</p> <p>18 A. Yes. We were based --</p> <p>19 Q. -- or elsewhere?</p> <p>20 A. We were based at Lane Aviation.</p> <p>21 MR. REINHART: Hold on one second. You</p> <p>22 have to let him finish asking the question</p> <p>23 before you answer.</p> <p>24 THE WITNESS: Okay. I'm sorry.</p> <p>25 BY MR. EDWARDS:</p>	<p>1 aircraft. I mean, whatever it takes to keep a</p> <p>2 corporate flight department operating.</p> <p>3 Q. Did you know back then of his relationship, if</p> <p>4 any, with Jeffrey Epstein?</p> <p>5 A. Not immediately, no.</p> <p>6 Q. When is the first time that you knew of a</p> <p>7 reputation or a relationship between Wexner and Epstein?</p> <p>8 A. Would have had to probably be around maybe</p> <p>9 '98, '99.</p> <p>10 Q. How do you become aware that they know one</p> <p>11 another?</p> <p>12 A. Because Jeffrey, every one -- That's when</p> <p>13 I became a flight engineer on the Boeing, and every</p> <p>14 once in a while Jeffrey would ride on the Boeing,</p> <p>15 that's all - that's all I knew.</p> <p>16 Q. How did it come about that he would ride on</p> <p>17 Wexner's Boeing?</p> <p>18 A. They were business associates, I think.</p> <p>19 Q. As far as you know, they were business</p> <p>20 associates.</p> <p>21 A. Right.</p> <p>22 Q. Did you understand the business relationship</p> <p>23 between the two?</p> <p>24 A. Well, I believe it's public knowledge</p> <p>25 that, I think, Jeffrey managed Mr. - some of Mr.</p>
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<p>1 Q. I'm sorry, have you ever had your deposition</p> <p>2 taken before?</p> <p>3 A. No.</p> <p>4 Q. You definitely never had your deposition taken</p> <p>5 before while somebody else is trying to eat at the same</p> <p>6 time they're trying to ask the questions - that's very</p> <p>7 bizarre.</p> <p>8 A. Yes, yes.</p> <p>9 Q. I meant to do this before I got here. But,</p> <p>10 regardless, I'll wait until you finish your answer before</p> <p>11 I ask my next question; you do the same thing. "Uh-huh"</p> <p>12 or "uh-uh," they kind of look the same on the record, so</p> <p>13 try to give us a "yes" or "no" or something we</p> <p>14 understand.</p> <p>15 A. Alright.</p> <p>16 Q. If I ask a question that was a bad question or</p> <p>17 something you don't understand - I've asked bad questions</p> <p>18 before - say, "I don't get it." I'll ask a better</p> <p>19 question.</p> <p>20 A. Okay.</p> <p>21 Q. You were working with Leslie Wexner. You got</p> <p>22 the job there starting in 1988. On a day-to-day basis,</p> <p>23 what would you be doing?</p> <p>24 A. Maintenance, aircraft maintenance,</p> <p>25 tracking of aircraft maintenance, cleaning of</p>	<p>1 Wexner's funds.</p> <p>2 Q. Is that something that Mr. Wexner told you?</p> <p>3 A. No.</p> <p>4 Q. Is that something that somebody of Mr.</p> <p>5 Wexner's organization would have told you?</p> <p>6 A. No.</p> <p>7 Q. Is that something that Jeffrey Epstein told</p> <p>8 you?</p> <p>9 A. No.</p> <p>10 Q. Is that just reading articles that speculate</p> <p>11 as to the business relationship between the two or do you</p> <p>12 got something more for me?</p> <p>13 A. No, it's just - it's speculation and, you</p> <p>14 know, what I've read, you know.</p> <p>15 Q. I mean, like you say, to me it's common</p> <p>16 knowledge --</p> <p>17 A. Right.</p> <p>18 Q. But it's only because of what I've read. I</p> <p>19 don't have a specific person that I could cite to to say</p> <p>20 that, do you?</p> <p>21 A. Right. No, just - just periodicals.</p> <p>22 Q. What's your understanding of the personal</p> <p>23 relationship, if any, between Wexner and Epstein?</p> <p>24 MR. GOLDBERGER: Form.</p> <p>25 A. Don't know.</p>

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<p>1 Q. Did you ever know of a time -- And I may be</p> <p>2 asking a question that would just be completely outside</p> <p>3 of your knowledge, so let me back up.</p> <p>4 Have you ever stayed at Leslie Wexner's house?</p> <p>5 A. No.</p> <p>6 Q. Do you know where his house is?</p> <p>7 A. Yes.</p> <p>8 Q. Do you know what the address is in Ohio?</p> <p>9 A. No, I just know the city.</p> <p>10 Q. Do you know who he lives with?</p> <p>11 A. Yes.</p> <p>12 Q. Who is that?</p> <p>13 A. His wife and children.</p> <p>14 Q. What's his wife's name?</p> <p>15 A. Abigail.</p> <p>16 Q. Abigail Wexner, and he has three or four</p> <p>17 daughters, right?</p> <p>18 A. No. He's got a son, Harry, and two</p> <p>19 daughters, I think.</p> <p>20 Q. A son and two daughters.</p> <p>21 A. I don't know. See, that was back in 2001.</p> <p>22 I don't know what they have - if they have more kids</p> <p>23 now.</p> <p>24 Q. Okay. Did you ever hear any information that</p> <p>25 he was homosexual?</p>	<p>1 Q. Have you spoken personally with Mr. Wexner?</p> <p>2 A. On business issues, yes.</p> <p>3 Q. Business issues related to your work on his</p> <p>4 airplanes?</p> <p>5 A. Correct.</p> <p>6 Q. Have you spoken to him on any other issues</p> <p>7 that don't involve business relationships with his</p> <p>8 airplanes?</p> <p>9 A. No.</p> <p>10 Q. Because you're hired basically for that</p> <p>11 purpose, so that's kind of how you deal with him.</p> <p>12 A. Yeah. It's I'm an employee and he's my</p> <p>13 employer and I only deal with him, you know, on</p> <p>14 issues that involve maintenance.</p> <p>15 Q. I think I probably know the answer to the next</p> <p>16 question, but just in case I don't, do you know any of</p> <p>17 his personal friends - people that he would hang out with</p> <p>18 on a social level - being Mr. Wexner?</p> <p>19 A. Through my business ties, yes, yes.</p> <p>20 Q. Who's that?</p> <p>21 A. I'm trying to remember -- You have to</p> <p>22 remember it's been several years.</p> <p>23 Q. Right.</p> <p>24 A. He was friends with the Tuckermans.</p> <p>25 Q. What's Mr. Tuckerman or Ms. Tuckerman's names?</p>
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<p>1 A. No.</p> <p>2 Q. Being Mr. Wexner.</p> <p>3 A. No.</p> <p>4 Q. Any indication to you that he may be</p> <p>5 homosexual or bisexual?</p> <p>6 A. Absolutely not.</p> <p>7 Q. Have you heard any information that he and Mr.</p> <p>8 Epstein were involved sexually with one another?</p> <p>9 A. Oh, no, no.</p> <p>10 Q. Would that surprise you?</p> <p>11 A. Absolutely.</p> <p>12 Q. And that's only because you know him and you</p> <p>13 know Mr. Wexner and you don't see the two together.</p> <p>14 A. Correct.</p> <p>15 MR. GOLDBERGER: Form.</p> <p>16 A. Well --</p> <p>17 Q. He --</p> <p>18 A. Go ahead.</p> <p>19 MR. REINHART: If you need to answer,</p> <p>20 answer the question.</p> <p>21 A. Yeah. No. I saw him with Sharon, which</p> <p>22 was his previous girlfriend before he met Abigail.</p> <p>23 Q. Right.</p> <p>24 A. No. There was never any hint or anything</p> <p>25 that I would even conceive that.</p>	<p>1 A. Ms. -- I can't. I always addressed them</p> <p>2 by their proper name.</p> <p>3 Q. Do you know what they do?</p> <p>4 A. They owned an optical company - opticians.</p> <p>5 They were high school friends from Mr. Wexner's high</p> <p>6 school days.</p> <p>7 Q. In Ohio or New York?</p> <p>8 A. He went to high school in Bexley.</p> <p>9 Q. Bexley, Ohio.</p> <p>10 Has he ever discussed with you how</p> <p>11 longstanding the relationship is between himself and Mr.</p> <p>12 Epstein?</p> <p>13 MR. GOLDBERGER: Form.</p> <p>14 A. I don't understand. Can you rephrase it?</p> <p>15 Q. Well, you know that at some point in time --</p> <p>16 You started working with him in 1988. The first time,</p> <p>17 according to my notes, that you became aware that he was</p> <p>18 friends or acquaintances with Mr. Epstein was '98 -</p> <p>19 almost ten years later.</p> <p>20 A. Right.</p> <p>21 Q. After you became aware that there was that</p> <p>22 relationship, whether business or otherwise, did he ever</p> <p>23 speak to you about how long he had known Mr. Epstein?</p> <p>24 A. Oh, no, no.</p> <p>25 Q. So as far as you were concerned, 1998, when</p>

<p style="text-align: center;">21</p> <p>1 you found out there was a relationship with Epstein, it 2 could have very well started then. 3 A. Yes. 4 Q. Aside from aircraft technician and taking care 5 of Mr. Wexner's aircraft back in the '80s and, I guess, 6 early '90s, did you have any other personal involvement 7 with him? 8 A. Just on aircraft completions. 9 Q. And when you would speak with him, would that 10 be over the telephone, at the airport, at his private -- 11 A. It would usually be at the corporate 12 office. 13 Q. At the corporate office? 14 A. At the corporate office. 15 Q. Can you tell me the address for his corporate 16 office? 17 A. No, I can't. 18 Q. If I requested that from your attorney, would 19 you be able to get that information? 20 A. Well, I mean, I imagine it's public 21 knowledge - wherever - it's at the Limited. 22 Q. And that's where you would meet him - at the 23 Limited? 24 A. Yeah. 25 Q. And how often was - you know, I know that</p>	<p style="text-align: center;">23</p> <p>1 Q. Who were some of the pilots? 2 A. Tim Staley, Jim Taylor. They've had some 3 turnover too. I don't know who all is still there 4 because retail is down. 5 Q. Was Larry Visoski a pilot used by Leslie 6 Wexner at any time? 7 A. No. 8 Q. How about David Rodgers? 9 A. No. 10 Q. Are those names you're familiar with? 11 A. Yes. 12 Q. Those are names you're familiar with how? 13 A. I flew with them when I was flying for Mr. 14 Epstein. 15 Q. So there's no real, other than yourself -- 16 Well, tell me if I'm wrong: I understand that you did 17 some work for Mr. Wexner related to his aircraft and you 18 did some work for Mr. Epstein, which we haven't yet got 19 to, but you did some work for him too. Are there any 20 other people that have that type of relationship with 21 both parties? 22 A. No. I'm sorry, resay that. 23 Q. Okay. You've already told us that you were 24 the aircraft technician for Mr. Wexner. 25 A. One of them. One of several, yes.</p>
<p style="text-align: center;">22</p> <p>1 we're talking about 15, 20 years ago - how often was Mr. 2 Wexner personally at that location at the Limited 3 offices? 4 A. I have no idea. 5 Q. But any time you needed to talk to him, that's 6 where he would be? 7 A. Yeah, and I usually went to Charlie 8 Hinson. 9 Q. Who's Charlie Hinson? 10 A. He was the president of the stores. He 11 basically was my go-between for these aircraft 12 completions for the design. 13 Q. And you mentioned the Gulfstream as an 14 aircraft. Did you also serve as a technician for other 15 aircrafts that were owned by Mr. Wexner? 16 A. Right, but not Mr. Wexner. They're owned 17 or operated by Limited Stores. 18 Q. Limited Stores? 19 A. Right. Yes. 20 Q. What did you do for them? 21 A. Same - maintenance. 22 Q. Did you ever fly in them? 23 A. On the Gulfstreams in the early days we 24 used flight mechanics, especially on international 25 flights.</p>	<p style="text-align: center;">24</p> <p>1 Q. One of them. Then you also have knowledge 2 about Mr. Epstein and some relationship with Mr. Epstein. 3 A. Correct. 4 Q. Are there any other pilots, aircraft 5 technicians, people like that that you know of to have a 6 relationship with both Mr. Wexner and Epstein? 7 A. No, no. 8 Q. Do you know how Mr. Wexner met Mr. Epstein? 9 A. No. 10 Q. How long - if you started in 1988 - how long 11 did you stay with Mr. Wexner and/or The Limited? 12 A. January of '01. 13 Q. Why did you stop? 14 A. Because what we were talking before, you 15 know, I wanted to continue flying. They bought a 16 BBJ, which is a two-pilot aircraft, and I wanted to 17 continue flying. Mr. Epstein bought the 727 and 18 offered me a position to continue flying and, you 19 know, basically set up the airplane for his flight 20 department because they hadn't had any previous large 21 aircraft experience. 22 Q. I missed something. It wasn't your fault, it 23 was mine. 24 The Gulfstream that you were talking about, 25 did you used to fly that as well as being a flight</p>

25	<p>1 technician?</p> <p>2 A. No, no.</p> <p>3 Q. Okay.</p> <p>4 A. You don't have to have a flight - a</p> <p>5 pilot's certificate to be a professional flight</p> <p>6 engineer. I've got a turbo - a flight engineer turbo</p> <p>7 jet rating, but you don't have to have a commercial</p> <p>8 ticket as long as you - the FAA recognizes your heavy</p> <p>9 aircraft maintenance experience.</p> <p>10 Q. So you're saying that if the FAA recognizes</p> <p>11 your heavy maintenance experience, I'm assuming that</p> <p>12 means that you understand the ins and outs of airplanes</p> <p>13 and you can work on them.</p> <p>14 A. On heavy high performance aircraft, yes.</p> <p>15 Q. Then you can also fly them?</p> <p>16 A. Sideways as a flight engineer.</p> <p>17 Q. Explain.</p> <p>18 A. On the older generation airliners there</p> <p>19 was three pilots - there's a captain, a first</p> <p>20 officer, and then the flight engineer is the</p> <p>21 gentleman that sits sideways and maintains all the</p> <p>22 systems.</p> <p>23 Q. When you say, "sits sideways," okay, I have</p> <p>24 a --</p> <p>25 A. Literally, you're physically sideways in</p>	27	<p>1 Q. Do you know why Epstein chose to buy that</p> <p>2 particular 727 rather than one of the other million 727s</p> <p>3 that are made?</p> <p>4 MR. GOLDBERGER: Form.</p> <p>5 A. Because it was probably the finest one out</p> <p>6 there --</p> <p>7 Q. Why?</p> <p>8 A. -- in all honesty. It's got a fully Paged</p> <p>9 STC interior with EFIS cockpit, and Limited's</p> <p>10 reputation on the way that we maintained our aircraft</p> <p>11 - it's the best one out there.</p> <p>12 Q. Describe for me the interior - I'm not talking</p> <p>13 about the Epstein days, we're talking about the Wexner</p> <p>14 days - describe for me the interior of the aircraft, and</p> <p>15 keep in mind that I've only been on a commercial aircraft</p> <p>16 where you don't see the pilots, there's a door, and then</p> <p>17 everybody, you know, there's just a bunch of seats where</p> <p>18 everybody sits there.</p> <p>19 A. Correct. Right.</p> <p>20 The aircraft -- You enter the airplane,</p> <p>21 it's got forward air stays, which most 727's don't,</p> <p>22 so you enter the forward door on the left-hand side,</p> <p>23 the forward entryway vestibule, and there's a door on</p> <p>24 the left, which leads to the cockpit, and then</p> <p>25 there's a door on the right which leads aft to the</p>
26	<p>1 the cockpit.</p> <p>2 Q. So you're not looking at the people that were</p> <p>3 flying on the plane and you're not looking at the pilots,</p> <p>4 you're actually literally sitting sideways.</p> <p>5 A. I sit sideways at a panel, yes.</p> <p>6 Q. What's your job?</p> <p>7 A. Maintain all the aircraft systems - the</p> <p>8 hydraulics, fuel management, pressurization,</p> <p>9 environmental controls.</p> <p>10 Q. That's not done by the pilots.</p> <p>11 A. No, no.</p> <p>12 Q. But if you've done that long enough and FAA is</p> <p>13 aware of your credentials in that respect, then you also</p> <p>14 could be credentialed to be a pilot as well?</p> <p>15 A. Well, sure, yeah, yeah. If that's a</p> <p>16 career choice you wish to take.</p> <p>17 Q. And was that?</p> <p>18 A. No, no. I was perfectly satisfied with my</p> <p>19 position as a flight engineer and Director of</p> <p>20 Maintenance.</p> <p>21 Q. What year did you say Epstein bought the 727</p> <p>22 that was once owned by Wexner?</p> <p>23 A. I don't know when the actual transition</p> <p>24 took place, but when I came - shortly around the</p> <p>25 period that I came on board in '01, January of '01.</p>	28	<p>1 forward salon.</p> <p>2 Q. What's the forward salon? Sorry.</p> <p>3 A. Forward seating area.</p> <p>4 Q. And is it set up basically the way that I'm</p> <p>5 picking it - in that there are 25 or 26 rows and they're</p> <p>6 numbered A through E?</p> <p>7 A. No, no, it's a corporate configuration.</p> <p>8 Q. Which means nothing to me, so help me.</p> <p>9 A. Picture a 600-mile an hour Winnebago. I</p> <p>10 mean, it's got conference tables and divans and large</p> <p>11 first class seating.</p> <p>12 Q. Any various dividers throughout --</p> <p>13 A. Yes.</p> <p>14 Q. -- to where there's a VIP room in the back or</p> <p>15 anything like that?</p> <p>16 A. It's compartmentized (sic), yes.</p> <p>17 Q. In what way? Describe it as specifically as</p> <p>18 you can.</p> <p>19 A. There's a forward salon, a mid galley -</p> <p>20 the galley's in the mid - an aft - an aft salon,</p> <p>21 which is - and then the aft state room.</p> <p>22 Q. Who designed that plane?</p> <p>23 A. I can't remember who the actual designer</p> <p>24 was. It was a Page interior, though. Page Avjet did</p> <p>25 the installation.</p>

<p style="text-align: center;">29</p> <p>1 Q. Who directed the design of that plane?</p> <p>2 A. It would have been Mr. Wexner. I mean, it</p> <p>3 was -- The layout has not changed.</p> <p>4 Q. "The layout has not changed," when you say</p> <p>5 that, you mean "from the time that I first got in it and</p> <p>6 I was under the guise of" - "under the employment of</p> <p>7 Wexner to the time I've been on it since with Epstein,</p> <p>8 the configuration is the same."</p> <p>9 A. Essentially, yes. We removed one chair</p> <p>10 and one small table that was an annoyance and that's</p> <p>11 it, but it's identical to what The Limited used.</p> <p>12 Q. Are there any blocked off areas to where if</p> <p>13 you're standing in the middle of the plane you can't see</p> <p>14 certain areas of the plane?</p> <p>15 A. There are pocket bulkheads. Yeah, there's</p> <p>16 dividers between the sections.</p> <p>17 Q. How big are these dividers and where are they?</p> <p>18 A. Well, there's a divider - the forward</p> <p>19 door, I told you, on the salon, then there's a pocket</p> <p>20 door on the forward side of the galley, a pocket door</p> <p>21 on the aft side of the galley, there's a pocket door</p> <p>22 between the aft salon and the office, and then</p> <p>23 there's another pocket door between the office and</p> <p>24 the state room.</p> <p>25 Q. Have you been on other 727s before that are</p>	<p style="text-align: center;">31</p> <p>1 because obviously there's a lot - there's not that</p> <p>2 many --</p> <p>3 A. Privately owned 727s, but this is -- As a</p> <p>4 matter of fact, The Limited's current BBJ has a very</p> <p>5 similar floor plan.</p> <p>6 Q. As Trump's?</p> <p>7 A. No, as the - as our 727.</p> <p>8 Q. Who's "our"?</p> <p>9 A. Mr. Epstein's. They didn't change a lot.</p> <p>10 It's --</p> <p>11 Q. Well, I thought that you had told me that the</p> <p>12 727 that was once owned by Wexner is the 727 that's owned</p> <p>13 by Epstein.</p> <p>14 A. It is, but what I'm saying is even their</p> <p>15 current airplane has the same layout - the BBJ. They</p> <p>16 put the same floor plane in the more modern airplane.</p> <p>17 Q. Well, they didn't have to put it there. It</p> <p>18 was already there, right?</p> <p>19 A. No, no, no. When you buy these aircraft -</p> <p>20 even a Gulfstream - when you buy them it's just a</p> <p>21 green hull, there's nothing in them, and you can</p> <p>22 customize your interior.</p> <p>23 Q. I'm sorry, we're miscommunicating somewhere,</p> <p>24 and I'm sure it's on me.</p> <p>25 MR. GOLDBERGER: Yes, it is.</p>
<p style="text-align: center;">30</p> <p>1 commercial airliners privately owned?</p> <p>2 A. Yes, yes.</p> <p>3 Q. Have you noticed similar configurations to</p> <p>4 where there are this many dividing doors or is this one</p> <p>5 that has more so than you've seen in the past?</p> <p>6 A. No, no, this is pretty atypical (sic).</p> <p>7 Q. It's pretty atypical?</p> <p>8 A. It's typical.</p> <p>9 Q. It's pretty typical?</p> <p>10 A. Yes, yes.</p> <p>11 Q. So what other airplanes - 727s, or other major</p> <p>12 airplanes - have you been on that have these types of</p> <p>13 dividers?</p> <p>14 A. Trump.</p> <p>15 Q. Trump's airplane?</p> <p>16 A. Yes.</p> <p>17 Q. Why were you on Trump's airplane?</p> <p>18 A. Well, I know the crew and, you know, this</p> <p>19 is a small-knit community. There's not very many of</p> <p>20 them out there, so everybody in this world knows one</p> <p>21 another to help one another out as far as --</p> <p>22 Q. By "there" --</p> <p>23 A. -- information-wise and stuff.</p> <p>24 Q. By "there aren't that many of these people out</p> <p>25 there," you don't mean there's not that many people -</p>	<p style="text-align: center;">32</p> <p>1 MR. EDWARDS: And I'm taking the blame for</p> <p>2 it - right away.</p> <p>3 MR. REINHART: Take that, Ed.</p> <p>4 MR. EDWARDS: Alright.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. My understanding - and please correct me when</p> <p>7 I'm wrong, because I know I am - Wexner has this 727 and</p> <p>8 he designs it in a certain way.</p> <p>9 A. Uh-huh.</p> <p>10 Q. And then you come to work for Epstein --</p> <p>11 A. Yes.</p> <p>12 Q. -- who buys the same 727. Your testimony, as</p> <p>13 I'm understanding it, is: It's basically the same floor</p> <p>14 plan as Wexner's floor plan. To me, it should be the</p> <p>15 exact same because he bought the same plane.</p> <p>16 A. No, he -- You're misunderstanding.</p> <p>17 Q. I figured.</p> <p>18 A. What I was stating is -- You were -- I was</p> <p>19 answering the question in regards to, "Is this</p> <p>20 unusual to have this many compartments and closed</p> <p>21 doors and bulkheads and things?"</p> <p>22 What I was trying to state was: No, it's</p> <p>23 not unusual - because The Limited even liked the</p> <p>24 floor plan so well in their old airplane that they</p> <p>25 sold to Mr. Epstein. They duplicated it in their new</p>

<p style="text-align: center;">33</p> <p>1 airplane - see what I'm saying? That's all I was --</p> <p>2 Q. So they didn't keep the floor plan. They</p> <p>3 actually took it out and they restructured the floor plan</p> <p>4 to basically match that old floor plan.</p> <p>5 A. Well, no. When you -- When you buy a</p> <p>6 Boeing business jet --</p> <p>7 Q. Yes.</p> <p>8 A. -- it comes with nothing inside. It's a</p> <p>9 tube. Nothing's in there. You design - have</p> <p>10 designers design your interior and then a fabricator</p> <p>11 or a facility such as Page Avjet to install this</p> <p>12 interior.</p> <p>13 Q. Right.</p> <p>14 A. What I was just trying to state was that</p> <p>15 The Limited liked their old floor plan in the old</p> <p>16 airplane so well - it worked so well for them - that</p> <p>17 they duplicated it and had that same interior</p> <p>18 installed in the new aircraft - same floor plan</p> <p>19 installed on the new plan.</p> <p>20 Q. So Epstein didn't buy the exact same plane.</p> <p>21 He bought the same type of plane.</p> <p>22 A. Well, more modern. He bought a 737,</p> <p>23 right.</p> <p>24 Q. Got it.</p> <p>25 A. Right.</p>	<p style="text-align: center;">35</p> <p>1 had a very identical or very like floor plan</p> <p>2 installed in the new airplane.</p> <p>3 Q. Got it.</p> <p>4 A. Okay? Sorry, it's a strange business.</p> <p>5 It's --</p> <p>6 Q. Tell me if I'm right: Mr. Wexner had a plane</p> <p>7 that had a floor plan that apparently appealed to Mr.</p> <p>8 Epstein, so Mr. Epstein bought that plane.</p> <p>9 A. Correct.</p> <p>10 Q. Mr. Wexner also liked that plane that he had</p> <p>11 just sold to Mr. Epstein, so he built in a floor plan</p> <p>12 very similar to the one he just sold to Mr. Epstein.</p> <p>13 A. In his new aircraft.</p> <p>14 Q. Brand new plane.</p> <p>15 A. Correct.</p> <p>16 Q. Got it. We're on the same page now.</p> <p>17 A. Alright.</p> <p>18 Q. Took us a while to get there.</p> <p>19 A. Yeah, sorry.</p> <p>20 Q. I think it was my fault, honestly, but</p> <p>21 alright?</p> <p>22 A. It's an unusual process if you haven't</p> <p>23 been around corporate airplanes.</p> <p>24 Q. I didn't realize that Mr. Wexner had a new</p> <p>25 plane.</p>
<p style="text-align: center;">34</p> <p>1 MR. REINHART: Hold on.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. Totally understand now.</p> <p>4 MR. REINHART: Can you clarify - Mr.</p> <p>5 Epstein or Mr. Wexner?</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. Mr. Epstein bought not Mr. Wexner's plane.</p> <p>8 A. No.</p> <p>9 Q. He bought the same type of plane that Mr.</p> <p>10 Wexner had and modeled the floor plan --</p> <p>11 A. No.</p> <p>12 Q. -- the same way that Mr. Wexner had it.</p> <p>13 A. That is not correct.</p> <p>14 Q. He bought, actually, Mr. Epstein --</p> <p>15 MR. REINHART: Hold on. Distinguish --</p> <p>16 Use names so we're very clear when you're</p> <p>17 talking about Mr. Epstein and Mr. Wexner, okay?</p> <p>18 A. Mr. Epstein bought Mr. Wexner's 727.</p> <p>19 Q. Okay.</p> <p>20 A. The actual airplane - bought it from him.</p> <p>21 Q. Which has a floor plan already in it.</p> <p>22 A. That we just discussed.</p> <p>23 Q. Alright. The floor plan's in the plane.</p> <p>24 A. Right. Mr. Wexner replaced the airplane</p> <p>25 that Mr. Epstein bought with a new airplane and he</p>	<p style="text-align: center;">36</p> <p>1 A. Yes.</p> <p>2 Q. That's where I had a problem.</p> <p>3 How many times have you been on Mr. Wexner's</p> <p>4 airplane?</p> <p>5 A. The new?</p> <p>6 MR. REINHART: Clarify which one you're</p> <p>7 talking about.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Before you ever met Mr. Epstein.</p> <p>10 A. I can't say. I mean, over the years?</p> <p>11 Q. Numerous times?</p> <p>12 A. Oh, I was his flight engineer. You mean</p> <p>13 when I was still employed by him?</p> <p>14 Q. Yes.</p> <p>15 A. Yes. I was the flight engineer. I</p> <p>16 don't --</p> <p>17 Q. So as a flight engineer, every time the plane</p> <p>18 leaves the ground, do you leave the ground with it?</p> <p>19 A. No. We had another engineer also.</p> <p>20 Q. So what percentage of times do you leave the</p> <p>21 ground in the airplane when the plane leaves the ground?</p> <p>22 A. For who?</p> <p>23 Q. For Mr. Wexner.</p> <p>24 A. Probably one-third of the time, because I</p> <p>25 was also the lead technician, so I had</p>

37	<p>1 responsibilities in the hangar, whereas the other</p> <p>2 engineer was a full time engineer.</p> <p>3 Q. And given the partitions that you've described</p> <p>4 in this airplane, are you able to see what's going on</p> <p>5 behind the doors of the various partitions of the</p> <p>6 airplane?</p> <p>7 A. If the doors are open or closed?</p> <p>8 Q. Closed.</p> <p>9 A. No.</p> <p>10 Q. Do you have any idea what's taking place in</p> <p>11 there?</p> <p>12 A. No.</p> <p>13 MR. GOLDBERGER: Form.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. When you're on the plane with Mr. Wexner, was</p> <p>16 there a time that he had -- Well, let me put it this way:</p> <p>17 When anybody is a passenger on any of these private</p> <p>18 planes, should there be logs of the names of the</p> <p>19 passengers on the planes?</p> <p>20 A. Not required, no.</p> <p>21 Q. Are you ever specifically instructed not to</p> <p>22 record the names?</p> <p>23 A. That wasn't part of my duties. That</p> <p>24 wasn't an engineer's task, but --</p> <p>25 Q. Do you --</p>	39	<p>1 A. There is normally a passenger manifest,</p> <p>2 yes.</p> <p>3 Q. Who creates the manifest?</p> <p>4 A. Probably dispatch.</p> <p>5 Q. Dispatch?</p> <p>6 A. At Limited.</p> <p>7 Q. Do you know who that is?</p> <p>8 MR. REINHART: Can you give a time frame?</p> <p>9 Do you mean currently or back when he worked</p> <p>10 there?</p> <p>11 MR. EDWARDS: I'm talking about back when</p> <p>12 he worked there.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. Do you know who that was at dispatch?</p> <p>15 A. That would have been Diane Williams.</p> <p>16 Q. Who does Diane Williams work for?</p> <p>17 A. Limited Flight Department.</p> <p>18 Q. Who does she report to?</p> <p>19 A. Tim Staley.</p> <p>20 Q. Who's Tim Staley?</p> <p>21 A. Director of Operations.</p> <p>22 Q. For who?</p> <p>23 A. Limited Flight Department.</p> <p>24 Q. What does he then do with that information?</p> <p>25 A. I don't know. I don't know.</p>
38	<p>1 A. -- no, not that I'm aware of.</p> <p>2 Q. Who is assigned the duty of reporting the</p> <p>3 names of the people who are going to be transported on</p> <p>4 the airplanes?</p> <p>5 MR. GOLDBERGER: Form.</p> <p>6 A. Captain.</p> <p>7 Q. So have you ever been privy to conversations</p> <p>8 where the captain is told by Mr. Wexner to record all of</p> <p>9 the names of the people that are going to be on the</p> <p>10 airplane?</p> <p>11 A. Can't say.</p> <p>12 Q. Sometimes?</p> <p>13 A. I can't -- You know, I can't say. I can't</p> <p>14 remember what our policies were at the time.</p> <p>15 Q. I'm not asking policies. I'm asking: Have</p> <p>16 you ever been around when the pilot was being instructed</p> <p>17 by Mr. Wexner - back in the late '80s, early '90s - to</p> <p>18 make sure that you record who's on this aircraft?</p> <p>19 A. I never heard Mr. Wexner address that, no.</p> <p>20 Q. I mean, God forbid the airplane crashes, you</p> <p>21 would like to know who's the on the airplane, right?</p> <p>22 MR. GOLDBERGER: Form.</p> <p>23 A. Yes.</p> <p>24 Q. Is there any way to determine who's on each</p> <p>25 particular flight in case anything happens?</p>	40	<p>1 Q. Have you ever talked to Tim Staley?</p> <p>2 A. From -- Yes, yes.</p> <p>3 Q. And what do you talk to him about?</p> <p>4 A. Oh, we're - we're friends. We worked</p> <p>5 together for years. I mean, I haven't talked to him</p> <p>6 since the holidays.</p> <p>7 Q. Do you know where he is now?</p> <p>8 A. To the best of my knowledge, still</p> <p>9 Director of Operations at Limited.</p> <p>10 Q. Do you have a number for him?</p> <p>11 A. Yes.</p> <p>12 Q. Can I have the number, please?</p> <p>13 A. It's [REDACTED].</p> <p>14 Q. Is that a work number?</p> <p>15 A. That's the Flight Department.</p> <p>16 Q. That's the best number to reach him at?</p> <p>17 A. Yes.</p> <p>18 Q. If I'm going to call him, that's the number I</p> <p>19 call?</p> <p>20 A. Correct.</p> <p>21 Q. And was he always in charge of flight</p> <p>22 directions?</p> <p>23 A. No, he was previously Chief Pilot.</p> <p>24 Q. He was previously Chief Pilot for Limited?</p> <p>25 A. Same, yes.</p>

41	43
<p>1 Q. And he was promoted, I suppose, to Flight 2 Director?</p> <p>3 A. Director of Operations. It's the 4 department crew. Most small departments don't have 5 directors until they start to grow.</p> <p>6 Q. And when he was Chief Pilot were you 7 affiliated with the Wexner organization?</p> <p>8 A. Yes, I was a maintenance technician.</p> <p>9 Q. And when you say somebody keeps flight logs, 10 is it always Tim -- is his name Tim Staley?</p> <p>11 A. Yes.</p> <p>12 Q. -- is it always Tim Staley who does that?</p> <p>13 A. No. I don't know where they go, honestly, 14 and the system may have changed.</p> <p>15 Q. Okay. Are you --</p> <p>16 A. I've been gone since --</p> <p>17 Q. Are you aware of any FAA policies to where 18 they need to know who's on the aircraft whenever it talks 19 off?</p> <p>20 A. Not under Part 91 Operations, there is 21 not.</p> <p>22 Q. Part what?</p> <p>23 A. Part 91.</p> <p>24 Q. What does Part 91 say, as far as you know?</p> <p>25 A. It's basically souls on board when you</p>	<p>1 international. The only time we do international 2 would be for Customs and Immigration.</p> <p>3 Q. So if it's an international flight --</p> <p>4 A. For Customs and Immigration - for coming 5 and leaving the country.</p> <p>6 Q. -- then they require that names of 7 individuals --</p> <p>8 A. It would be names, passports, that kind of 9 stuff - normal.</p> <p>10 Q. Did you ever do any international flights 11 while employed by The Limited, Victoria's Secret, the 12 whole Wexner group?</p> <p>13 A. Yes.</p> <p>14 Q. How many?</p> <p>15 A. No way of knowing. I mean, I'm - can't 16 say. It's, like I say, years, but.</p> <p>17 Q. What years would you done it?</p> <p>18 A. Started flying as a flight mechanic in 19 '89, and then started flying the Boeing in '99, so - 20 to '01, so '89 to '01, basically.</p> <p>21 (Mr. Goldberger exited.)</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. So '89 to '01, if I wanted all of the flight 24 logs, who would I request those from - Tim Staley?</p> <p>25 A. Don't know. I don't know who --</p>
42	44
<p>1 file a flight plan - that's the only thing you're 2 required to do. When you file your flight plan you 3 file souls on board.</p> <p>4 Q. What does that mean, "souls on board"?</p> <p>5 A. In other words, living bodies on board. 6 In other words, if you have - so if there's an 7 accident and you have four and you're transporting a 8 cadaver, that they go to the accident scene and don't 9 find five bodies - think there were five fatalities.</p> <p>10 Q. So it's your understanding from what you need 11 to report are, "I have five people on board."</p> <p>12 A. Correct, and that's for the flight plan.</p> <p>13 Q. So there's no reason to say that, "I have Joe 14 Schmo on board."</p> <p>15 A. Not under Part 91, no.</p> <p>16 Q. That's doing something over and above.</p> <p>17 A. That's correct.</p> <p>18 Q. You are aware, though, that there are certain 19 flight plans where they actually name individuals that 20 are on the airplane?</p> <p>21 MR. GOLDBERGER: Form.</p> <p>22 A. No.</p> <p>23 Q. I mean, you've seen that before.</p> <p>24 MR. GOLDBERGER: Form.</p> <p>25 A. No, not on flight plans, no - unless it's</p>	<p>1 Q. What does Tim Staley do after he maintains 2 these records?</p> <p>3 A. I don't know.</p> <p>4 Q. He's never told you what he does?</p> <p>5 A. No.</p> <p>6 Q. Certainly they're kept on file somewhere, 7 right?</p> <p>8 A. I would assume.</p> <p>9 Q. What's the name of the company that owns the 10 airplanes? I know it's affiliated with Wexner and all 11 that, but what's the name of the company?</p> <p>12 A. Well, there were several companies. I 13 mean, the way corporate aviation flight departments 14 are set up, they're under holdings companies.</p> <p>15 Q. I'll go with all of them.</p> <p>16 A. Well, I don't know. They change. They 17 change sometimes by the year, sometimes -- I have no 18 idea what they're under now.</p> <p>19 Q. What were they under back in '88 --</p> <p>20 A. It was like --</p> <p>21 Q. -- to the best of your memory?</p> <p>22 A. They change. I mean, every time we got a 23 new aircraft, or whatever, they changed. They were 24 like Northeast Holding, Southwest Holding, LLC - 25 Wilmington, Delaware, companies, which is standard</p>

<p style="text-align: center;">45</p> <p>1 for these, you know.</p> <p>2 Q. Did Leslie Wexner ever tell you that he</p> <p>3 allowed Jeffrey Epstein to serve in some sort of</p> <p>4 capacity, representative capacity, for any of these</p> <p>5 companies?</p> <p>6 A. No. He would never say that to me</p> <p>7 anyways, no.</p> <p>8 Q. What's the first time you ever saw Jeffrey</p> <p>9 Epstein?</p> <p>10 A. Can't say. I'm not sure.</p> <p>11 Q. I think you saw him before you started working</p> <p>12 for him or with him?</p> <p>13 A. Oh, yeah, that's -- Where I first saw him</p> <p>14 was when I flew him on The Limited 727.</p> <p>15 Q. What year do you think that was?</p> <p>16 A. It would have had to have been --</p> <p>17 Q. Talking late '80s, early '90s?</p> <p>18 A. Late '90s.</p> <p>19 Q. Late '90s?</p> <p>20 A. Yeah, probably - mid to late '90s.</p> <p>21 Q. Well, I mean, if you're taken over with</p> <p>22 Jeffrey Epstein in, what, 2001 --</p> <p>23 A. Correct.</p> <p>24 Q. -- then you're talking late '90s is the first</p> <p>25 time you see him?</p>	<p style="text-align: center;">47</p> <p>1 A. They were -- They were generated, but I</p> <p>2 don't know, you know, why - what the particular</p> <p>3 reasoning was for it.</p> <p>4 Q. Do you know if Terry (sic) Staley would have</p> <p>5 been the one to forward those flight logs to the FAA?</p> <p>6 A. No, no, no. I -- They were all just for</p> <p>7 business use - not forwarded to the FAA.</p> <p>8 Q. Okay. How --</p> <p>9 A. The FAA doesn't care about flight logs.</p> <p>10 Q. How did the FAA monitor when that plane took</p> <p>11 off?</p> <p>12 A. Flight plans.</p> <p>13 Q. And was it your understanding that when the</p> <p>14 plane took off, the FAA was unaware as to who was ever on</p> <p>15 it?</p> <p>16 A. Pretty much, yeah. They don't care about</p> <p>17 names. When you file flight plans with the flight</p> <p>18 service station or via electronically, all they care</p> <p>19 about is souls on board, contact information, flight</p> <p>20 routing, things like that.</p> <p>21 Q. Are there time limits as to when the plane is</p> <p>22 allowed to take off?</p> <p>23 A. Yeah, usually -- From what point? What do</p> <p>24 you mean? Time of the day or --</p> <p>25 Q. Yeah, yeah, time of the day. I understand</p>
<p style="text-align: center;">46</p> <p>1 A. Well, mid -- I don't know exactly. I</p> <p>2 can't really say, really.</p> <p>3 Q. I won't hold you to it. It is what it is.</p> <p>4 Mid to late '90s, if I wanted the flight logs</p> <p>5 that have him on it, on the airplane, who would I</p> <p>6 subpoena to get those records?</p> <p>7 A. I have no idea.</p> <p>8 Q. Are they turned into the FAA, to the best of</p> <p>9 your knowledge?</p> <p>10 A. No, the FAA doesn't require them.</p> <p>11 Q. So FAA does not get the flight -- Well, what's</p> <p>12 the point of even keeping these?</p> <p>13 A. Sometimes I think the IRS -- I mean, this</p> <p>14 is on assumption, I'm not even sure, but mostly for</p> <p>15 like IRS tracking for if you have people that have</p> <p>16 dual homes, dual statehoods, or whatever.</p> <p>17 (Mr. Goldberger entered.)</p> <p>18 MR. GOLDBERGER: Can we take a time out?</p> <p>19 (Short break.)</p> <p>20 (Mr. Pike appeared via telephone to</p> <p>21 replace Mr. Goldberger.)</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. FAA flight logs - do you know why they're</p> <p>24 generated, how they're generated, if they were generated</p> <p>25 back in the Wexner days?</p>	<p style="text-align: center;">48</p> <p>1 that there's some time where if it's too late they can't</p> <p>2 take off, right?</p> <p>3 A. Only where there's a curfew on the airport</p> <p>4 - not all airports, no. No, airplanes can fly any</p> <p>5 time unless that airport has a noise curfew or</p> <p>6 something, yeah.</p> <p>7 Q. Did you ever know of Wexner's plane to take</p> <p>8 off after ten o'clock p.m.?</p> <p>9 A. Yes. Yeah.</p> <p>10 Q. Were you ever on that plane when it did?</p> <p>11 A. Probably, yeah, yeah.</p> <p>12 Q. Were you ever on that plane when there were</p> <p>13 girls on the plane?</p> <p>14 A. Describe -- Define "girls." On the Wexner</p> <p>15 airplane?</p> <p>16 Q. Yes.</p> <p>17 A. There would be ladies and his daughters.</p> <p>18 I mean --</p> <p>19 Q. Other than family members.</p> <p>20 A. There would be business associates. If</p> <p>21 you're talking young women, yes, business associates</p> <p>22 from the divisions.</p> <p>23 Q. Have you ever been on the plane when there</p> <p>24 were girlfriends of Leslie Wexner?</p> <p>25 A. Only when Abigail - before his - became</p>

<p style="text-align: center;">49</p> <p>1 his bride, yes.</p> <p>2 Q. How about after --</p> <p>3 A. I mean --</p> <p>4 Q. -- she became his --</p> <p>5 A. -- It was Abigail. She was the only</p> <p>6 girlfriend.</p> <p>7 Q. How about after Abigail?</p> <p>8 A. No.</p> <p>9 Q. Have you ever seen sex or sex-related</p> <p>10 instances occur on Leslie Wexner's airplane?</p> <p>11 A. Absolutely not. We didn't even have</p> <p>12 playing cards. He looked at the aircraft as a</p> <p>13 business - a flying business office.</p> <p>14 Q. When you say "playing cards," what do you</p> <p>15 mean?</p> <p>16 A. Playing, you know, to --</p> <p>17 Q. Oh, playing cards.</p> <p>18 A. Yes, playing cards.</p> <p>19 Q. So every time that you were on Leslie Wexner's</p> <p>20 airplane, it was used strictly for business?</p> <p>21 A. Well, I don't know if it was used strictly</p> <p>22 for business, but there was no, you know, it was -- I</p> <p>23 don't know what the purpose of the actual trip was,</p> <p>24 but never saw, you know, anything, you know.</p> <p>25 Q. Was there ever a time when you were --</p>	<p style="text-align: center;">51</p> <p>1 Q. Yes, with you on it.</p> <p>2 A. I can't -- I can't say.</p> <p>3 Q. Well, where do you remember going in it?</p> <p>4 A. Well, we would normally go to London,</p> <p>5 Milan, Paris. I mean, mostly fashion areas and</p> <p>6 business - business areas.</p> <p>7 Q. When you say "fashion areas," what do you</p> <p>8 mean?</p> <p>9 A. Well, retail. I mean, you know, design</p> <p>10 for clothing and stuff like that.</p> <p>11 Q. What was the purpose?</p> <p>12 A. I'm sure it was business. I have no idea</p> <p>13 what the actual purpose was. I don't --</p> <p>14 Q. Did you get off the plane?</p> <p>15 A. Well, of course.</p> <p>16 Q. What did you do there?</p> <p>17 A. Go to a hotel, eat dinner, wait to find</p> <p>18 out when you're going to the next place.</p> <p>19 Q. Were you ever on an international flight on</p> <p>20 one of Mr. Wexner's planes that Jeffrey Epstein was also</p> <p>21 on?</p> <p>22 A. I can't say. I can't remember.</p> <p>23 Q. Maybe?</p> <p>24 A. Possibly.</p> <p>25 Q. Do you remember any specific places that</p>
<p style="text-align: center;">50</p> <p>1 MR. REINHART: Hold on. Were you</p> <p>2 finished?</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. I thought you were finished.</p> <p>5 A. Yeah, I don't understand. I don't</p> <p>6 understand that question.</p> <p>7 Q. I'm going to clarify. Were there ever times</p> <p>8 when you were on the plane and either Leslie Wexner</p> <p>9 and/or other individuals went behind these various areas</p> <p>10 that you could not see into?</p> <p>11 A. Yes. Yeah.</p> <p>12 Q. Do you know what they were doing in there?</p> <p>13 A. Probably sleeping. He would go to bed at</p> <p>14 night on the long trips, okay.</p> <p>15 Q. Any time that more than one person went in one</p> <p>16 of these areas that you would not be able to see into?</p> <p>17 A. Not that I'm aware of, but my exposure to</p> <p>18 back there is not that, you know, is limited.</p> <p>19 Q. How many times did you see Jeffrey Epstein</p> <p>20 ride that plane with Leslie Wexner?</p> <p>21 A. Not many, but I can't say exact.</p> <p>22 Q. How many international flights do you remember</p> <p>23 that plane taking?</p> <p>24 A. Remember -- The airplane itself taking</p> <p>25 international?</p>	<p style="text-align: center;">52</p> <p>1 Jeffrey Epstein went while on that plane outside the</p> <p>2 United States?</p> <p>3 A. I can't remember. No, no. Like I say, I</p> <p>4 can't even remember if we took it for sure.</p> <p>5 Q. Any time that you remember Jeffrey Epstein</p> <p>6 being on the airplane, do you also remember there being</p> <p>7 girls on the airplane along with Mr. Epstein?</p> <p>8 A. I can't -- I can't say. I can't remember.</p> <p>9 Q. When's the first time you remember seeing</p> <p>10 Jeffrey Epstein?</p> <p>11 A. Well, like I say, I don't even remember</p> <p>12 the year. I can't even pinpoint down to the year.</p> <p>13 It was after - some time after I started flying the</p> <p>14 727, because that's the only exposure.</p> <p>15 Q. Okay. I'm not going to ask you at all during</p> <p>16 this deposition to guess. I thought at some point in</p> <p>17 time you told me you remember seeing Jeffrey Epstein,</p> <p>18 right?</p> <p>19 A. Yes.</p> <p>20 Q. In fact, you work for him now.</p> <p>21 A. Yes.</p> <p>22 Q. So at some point in time you saw him and you</p> <p>23 saw him for the first time.</p> <p>24 A. Correct.</p> <p>25 Q. When's the first time you remember seeing him?</p>

<p style="text-align: center;">53</p> <p>1 It may not be the first time you saw him. When's the 2 first time you remember seeing him? 3 A. '99, somewhere in that area. 4 Q. Alright. In '99 were you working for Leslie 5 Wexner or were you working for Jeffrey Epstein? 6 A. Leslie Wexner. 7 Q. And do you remember the context in which you 8 saw Jeffrey Epstein? 9 A. It was a flight. 10 Q. What did Leslie Wexner ever tell you in terms 11 of who Jeffrey Epstein was? 12 A. Never told me anything who Jeffrey Epstein 13 was. 14 Q. Did you ever ask? 15 A. No. 16 Q. Did you ever ask back in 1999 when you saw 17 this guy, "I wonder what he does"? 18 A. No. 19 Q. Not even curious? 20 A. No. It's not my place. I don't -- I 21 don't need to know or want to know what people's 22 associations are. 23 Q. Next time you saw Jeffrey Epstein was when? 24 A. I can't say for sure. 25 Q. Have you seen Jeffrey Epstein at Leslie</p>	<p style="text-align: center;">55</p> <p>1 Jeffrey Epstein helped to - I think, what you said was - 2 manage Leslie Wexner's money? 3 A. Some of his accounts, yes, I guess. 4 Q. Why do you think that? 5 A. From what I've read in periodicals and 6 magazines. 7 Q. You've read in what periodicals and magazines? 8 A. I think it was, what, Vanity Fair there 9 was an article a couple years back, three or 10 four years back, and a New York magazine as I 11 mentioned. 12 Q. Why did you read the article? 13 A. Well, obviously it was dealing with the 14 gentleman that I was working for, so out of 15 curiosity, you know. 16 Q. Right, because people tend to be curious -- 17 A. Right. 18 Q. -- right? But when I just asked you who 19 Jeffrey Epstein was and the relationship, you said, "I 20 have no idea," implying that you weren't curious. But at 21 some point in time you got curious as to who this person 22 is, right? 23 A. Who Jeffrey Epstein is? 24 Q. Yes. 25 A. Well, yeah, when you're working for him</p>
<p style="text-align: center;">54</p> <p>1 Wexner's house? 2 A. No. 3 Q. Never? 4 A. Never. I've never -- 5 Q. Have you ever -- 6 A. -- been to Wexner's house. 7 Q. You've never been there? 8 A. No. 9 Q. Have you ever known of Leslie Wexner or heard 10 of Leslie Wexner having minor girls or minor boys at his 11 house? 12 A. Oh, no. 13 Q. Have you ever heard of Jeff -- 14 MR. REINHART: I assume, other than his 15 children. 16 MR. EDWARDS: Oh, of course. 17 A. Yeah. No - his children. I'm sorry. 18 Thank you. 19 Q. Have you ever known of Jeffrey Epstein to take 20 underage girls to Leslie Wexner's house? 21 A. No. 22 Q. Do you know how it is that Jeffrey Epstein and 23 Leslie Wexner met each other? 24 A. No. 25 Q. You mentioned earlier that you believed that</p>	<p style="text-align: center;">56</p> <p>1 and he's in a magazine, you're going to read the 2 article. 3 Q. Okay, so at some point in time, did you Google 4 Jeffrey Epstein? 5 A. No, no. 6 Q. Have you read the articles about Jeffrey 7 Epstein? 8 A. Lately? 9 Q. Yes. 10 A. Oh, of course, yes, in the newspapers. 11 Q. And you're aware of why your deposition's 12 being taken today. 13 A. Yes, of course. 14 Q. And it has something to do not with a case 15 with Leslie Wexner, but a case involving Jeffrey Epstein. 16 A. Correct. Yes, of course. 17 Q. When you got this deposition subpoena, did you 18 by any chance try to look up some information on Jeffrey 19 Epstein - who this guy is? 20 A. No, no. I mean -- 21 Q. Is there anything -- 22 MR. REINHART: Hold on. Were you 23 finished? 24 Q. Okay. Go ahead. 25 A. No. I mean, other than every once in a</p>

57	<p>1 while I'll get a Google alert just following the case</p> <p>2 - just out of interest - because he's still my</p> <p>3 employer, you know, and you don't want to be</p> <p>4 blind-sided, but other than that, no --</p> <p>5 Q. When you --</p> <p>6 A. -- I never looked into his financial</p> <p>7 background or anything look that. I don't know if</p> <p>8 you can.</p> <p>9 Q. When you say a "Google alert," that's</p> <p>10 something that you actually go out of your way and set up</p> <p>11 on Google, right?</p> <p>12 A. Yeah.</p> <p>13 Q. When did you do that?</p> <p>14 A. A year ago or so.</p> <p>15 Q. Why did you do it?</p> <p>16 A. Because I'm not around Mr. Wexner - or Mr.</p> <p>17 Epstein anymore. I don't --</p> <p>18 Q. Well, he was in jail --</p> <p>19 MR. REINHART: Hold on. Were you finished</p> <p>20 with your answer?</p> <p>21 A. I haven't been a full time employee with</p> <p>22 Mr. Wexner since --</p> <p>23 MR. REINHART: Epstein.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Epstein or Wexner?</p>
58	<p>1 A. I'm sorry -- Mr. Epstein, since February</p> <p>2 of 2007.</p> <p>3 Q. Well, a lot of that has to do with him being</p> <p>4 incarcerated --</p> <p>5 A. No, no.</p> <p>6 Q. -- for a year, right?</p> <p>7 MR. PIKE: Form.</p> <p>8 A. No, it was because I wanted to make a job</p> <p>9 - a career change.</p> <p>10 Q. Why?</p> <p>11 A. Because I got tired of flying, being on</p> <p>12 the road, wanted to be home.</p> <p>13 Q. Did it bother you that your boss, back in</p> <p>14 2007, was under investigation?</p> <p>15 A. Of course.</p> <p>16 Q. Is that part of the reason why maybe you</p> <p>17 wanted to make a career change?</p> <p>18 A. No, no. The reason was the amount of</p> <p>19 flying that I had been doing and the overnights, and</p> <p>20 when something's no longer fun, it's time to find</p> <p>21 something else to do.</p> <p>22 Q. Why wasn't it fun anymore?</p> <p>23 A. It's a very fast pace. I wanted to spend</p> <p>24 time at home. I wanted to get back into strictly</p> <p>25 maintenance.</p>
59	<p>1 Q. When you say "fast pace," how often are you</p> <p>2 flying?</p> <p>3 A. Every week - sometimes two, three times a</p> <p>4 week.</p> <p>5 Q. And that's by the time that you're working for</p> <p>6 Jeffrey Epstein?</p> <p>7 A. Yes, yes.</p> <p>8 Q. Because back in the Leslie Wexner days you</p> <p>9 weren't flying every day.</p> <p>10 A. No, no, no, because there was another</p> <p>11 engineer, no.</p> <p>12 Q. Right.</p> <p>13 A. I had about one-third of the flights.</p> <p>14 Q. So from 1988, when you start working with</p> <p>15 Leslie Wexner, through '89 or so, you're not flying all</p> <p>16 the time, right?</p> <p>17 A. No. Oh, no, no. Actually, in '88, I was,</p> <p>18 you know, I was - my primary duties were in the</p> <p>19 hangar - maintenance.</p> <p>20 Q. Did you enjoy doing that?</p> <p>21 A. The maintenance part of it?</p> <p>22 Q. Yes.</p> <p>23 A. Oh, yeah, that's my background, that's my</p> <p>24 forte.</p> <p>25 Q. Is that something that you've gone back to?</p>
60	<p>1 A. Yes.</p> <p>2 Q. When did you go back to that?</p> <p>3 A. February of '07.</p> <p>4 Q. Who are you doing that for?</p> <p>5 A. Dankjold Reed Aviation.</p> <p>6 Q. Say it again.</p> <p>7 A. Dankjold Reed Aviation.</p> <p>8 Q. How did you get that job?</p> <p>9 A. Applied for it and knew the previous</p> <p>10 Director of Maintenance, who was retiring.</p> <p>11 Q. Did Leslie Wexner and/or Mr. Epstein help you</p> <p>12 to get that job?</p> <p>13 A. No, no ties whatsoever.</p> <p>14 Q. So who introduces you to Jeffrey Epstein?</p> <p>15 A. Probably it would have been Larry. The</p> <p>16 first actual formal introduction?</p> <p>17 Q. Right.</p> <p>18 A. Probably would have been Larry Visoski. I</p> <p>19 knew Larry and Dave when they flew for Glimcher</p> <p>20 Corporation.</p> <p>21 Q. Tell me a little bit about that. Larry</p> <p>22 Visoski - how do you know him?</p> <p>23 A. He's the Chief Pilot for Jeffrey and hired</p> <p>24 me.</p> <p>25 Q. Well, he's the Chief Pilot now --</p>

61	63
1 A. Right.	1 Q. How did you learn of Leslie Wexner?
2 Q. -- for Jeffrey Epstein.	2 A. Oh, I mean, he's very well-known in
3 A. Right.	3 Columbus, because, you know, billionaires in central
4 Q. When is the first time you met Larry Visoski?	4 Ohio, aren't, you know --
5 A. It was before he worked for Jeffrey. He	5 Q. Aren't a dime a dozen, right?
6 and Dave were flying for a gentleman - Glimcher	6 A. Exactly, and small guy that made it big,
7 Corporation.	7 you know, because that's where the name Limited - so
8 Q. Flying for who?	8 hearsay is - the name Limited came from he started
9 A. Glimcher Corporation.	9 with limited resources.
10 Q. How do you spell that?	10 Q. So did you know him before he was married to
11 A. G-L-I-M-C-H-E-R, I think. They were --	11 Abigail?
12 They had an airplane based at Lane Aviation in	12 A. Yes.
13 Columbus with us.	13 Q. And did you know him to date exclusively women
14 Q. And David Rodgers?	14 prior to that?
15 A. Yes.	15 A. The only -- I knew that he was dating
16 Q. How did you know David Rodgers?	16 Sharon.
17 A. Same, from -- They were in the same hangar	17 Q. Right.
18 we were in.	18 A. I never flew Sharon, but he dated Sharon
19 Q. Are you from here?	19 for a long time, and then there was, you know, they
20 A. No.	20 broke up and then he started dating Abigail.
21 Q. Where are you from?	21 Q. And have you heard any rumors about him dating
22 A. Columbus, Ohio.	22 men as well?
23 Q. So you're from Columbus, Ohio, and that's also	23 A. No, no.
24 a place where Leslie Wexner lives.	24 Q. First time that you're hearing about it is me
25 A. Yes.	25 telling you that, right?
62	64
1 Q. So that was at least convenient for you?	1 A. Yeah.
2 A. Oh, yeah. No, it was -- Yeah.	2 Q. So back to Larry Visoski - you don't know him
3 Q. Did you go to college in Ohio as well?	3 while you're employed with Leslie Wexner.
4 A. Yes, Columbus State for my Aviation	4 A. Yes.
5 degree.	5 Q. You do?
6 Q. As your first job that you had, was that with	6 A. Yeah.
7 Leslie Wexner?	7 Q. How do you meet him?
8 A. Oh, no. I started working for Ohio State	8 A. Met him because their aircraft was in our
9 University --	9 hangar. The Glimcher aircraft was based in our
10 Q. And then where?	10 hangar and got to know him that way.
11 A. -- in their flight department.	11 Q. Glimcher is a company owned by whom?
12 Went from Ohio State University to get a	12 A. I don't know if it's public or not. It
13 short stint, a contract maintenance for a - a	13 was a mail development company not associated with
14 contract for NASA at Langley - researcher, and then	14 Limited.
15 that was under the direction - that was contracted	15 Q. So what's the conversation between you and
16 under OSU's umbrella for airport research. They had	16 Larry Visoski? Obviously you all end up working for
17 an Aviation Research Department. Then after that	17 Epstein, so try to lead me through that.
18 went to Red Roof Inns - maintenance technician for	18 A. Well, I think -- I mean, we got to know --
19 Red Roof Inns.	19 I mean, you're neighbors in a hangar environment, so
20 Q. What was it - Gregory Finns?	20 you have discussions.
21 A. No, Red Roof Inns.	21 Larry was the mechanic. He was also
22 Q. Red Roof Inns.	22 pilot/mechanic on the Hawker for Glimcher, and you
23 A. True Sports Racing. It was Budweiser	23 kind of form a relationship and a rapport, and then,
24 racing - Indy car team and Red Roof Inns, the motel	24 I believe, Glimcher sold their airplane. I don't
25 chain. Then from there I went to The Limited stores.	25 know how Dave and Larry ended up with Jeffrey, I

65	<p>1 don't know how they found that job, but they started</p> <p>2 working for Jeffrey then, but they still --</p> <p>3 Q. Did you ask them?</p> <p>4 A. No, I don't think -- I've never asked</p> <p>5 them, "How --</p> <p>6 Q. Did Jeffrey --</p> <p>7 A. -- did you meet them?"</p> <p>8 Q. -- have a plane in the same hangar?</p> <p>9 MR. REINHART: Hold on. Let him finish</p> <p>10 his answer.</p> <p>11 MR. EDWARDS: I'm sorry. I thought you</p> <p>12 were finished.</p> <p>13 MR. PIKE: This is Michael Pike. Let him</p> <p>14 finish his question because, keep in mind - you</p> <p>15 finish your question, let him finish his answer</p> <p>16 - keep in mind, I'm on the phone, so I'm having</p> <p>17 a hard time hearing his response in the</p> <p>18 background.</p> <p>19 MR. EDWARDS: You're actually on the other</p> <p>20 end of the table. Do you want us to try to move</p> <p>21 the phone closer?</p> <p>22 MR. PIKE: Yes, that would be good.</p> <p>23 MR. EDWARDS: I'll do that for you, man.</p> <p>24 I'm sorry, I really did forget that you were</p> <p>25 here.</p>	67	<p>1 help them with the airplane, get, you know, become a</p> <p>2 flight engineer - Director of Maintenance - on it.</p> <p>3 Q. So is Larry also an Ohio person?</p> <p>4 A. Well, he wasn't -- I think he was born and</p> <p>5 raised in South Florida and then he was in Ohio for</p> <p>6 that job. He lived there for a short period, yeah,</p> <p>7 for Glimcher.</p> <p>8 Q. And then David Rodgers also?</p> <p>9 A. They both lived in Columbus, yeah. I</p> <p>10 mean, I don't know if it was a suburb, but they lived</p> <p>11 in central Ohio.</p> <p>12 Q. But the hangar we're talking about is in Ohio.</p> <p>13 A. Yeah, Lane Aviation.</p> <p>14 Q. You would see them basically on a day-to-day</p> <p>15 basis because the aircraft that you were a technician</p> <p>16 for --</p> <p>17 A. Right.</p> <p>18 Q. -- was very close in proximity to the aircraft</p> <p>19 that they were piloting.</p> <p>20 A. Yes.</p> <p>21 Q. They approach you at some point in time and</p> <p>22 say what specifically?</p> <p>23 A. I can't remember the specific</p> <p>24 conversations, but it was like, you know, asked me if</p> <p>25 I would be interested in, if Jeffrey bought the 727</p>
66	<p>1 MR. PIKE: Not a problem. I've objected</p> <p>2 to form a couple of times. I'm not quite sure</p> <p>3 if that was even heard, but that's neither here</p> <p>4 nor there.</p> <p>5 MR. EDWARDS: We'll say the last ten</p> <p>6 questions you objected to form. I got you.</p> <p>7 What was my last question, Pike? You</p> <p>8 don't even remember.</p> <p>9 MR. REINHART: You asked him conversations</p> <p>10 he had with Larry Visoski and Dave Rodgers about</p> <p>11 how they come came to work for Epstein.</p> <p>12 MR. EDWARDS: Good.</p> <p>13 A. I really never queried them on how they</p> <p>14 come to work for Jeffrey. I think Dave was hired</p> <p>15 first and he brought - this is all speculation - and,</p> <p>16 I think, he brought Larry on board.</p> <p>17 Q. So as far as you know, however you know, David</p> <p>18 Rodgers was the first Epstein contact and then Larry</p> <p>19 Visoski rode it in.</p> <p>20 A. The way I understand, yeah.</p> <p>21 Q. How did you become involved in the</p> <p>22 three-person train to Epstein?</p> <p>23 A. When it became apparent that Jeffrey, or</p> <p>24 Mr. Epstein, was going to buy the 727, Larry</p> <p>25 approached me, that if I would want to, you know,</p>	68	<p>1 being, you know, the flight engineer and help them,</p> <p>2 you know, get the flight department going, and I told</p> <p>3 them I would.</p> <p>4 Q. And why did you say "yes" considering that you</p> <p>5 had a boss in Leslie Wexner who was seemingly pretty good</p> <p>6 to you for the last ten years?</p> <p>7 A. Oh, he's excellent.</p> <p>8 Q. Yes.</p> <p>9 A. No, fine flight department and Mr. Wexner</p> <p>10 is a fine person.</p> <p>11 Q. Right.</p> <p>12 A. The reason being is, you know, I already</p> <p>13 stated this I think twice before, was that I wanted</p> <p>14 to be able to continue to fly and that would give me</p> <p>15 the opportunity to continue to fly as a flight</p> <p>16 engineer and the challenge of starting this airplane.</p> <p>17 Q. Right. I didn't ignore you. I heard you say</p> <p>18 that, but then I also heard you say he brought a brand</p> <p>19 new plane.</p> <p>20 A. It was only a two-man airplane --</p> <p>21 Q. So then he would have --</p> <p>22 A. -- and the modern aircraft could only have</p> <p>23 two pilots, right.</p> <p>24 Q. Got you. I understand.</p> <p>25 So they approach you with this prospect of the</p>

69	71
<p>1 two of them - Dave Rodgers and Larry Visoski - becoming</p> <p>2 the pilots for the 727 --</p> <p>3 A. Correct.</p> <p>4 Q. -- that Epstein's buying and, "Hey, would you</p> <p>5 like to be a part of it?"</p> <p>6 A. Right.</p> <p>7 Q. I mean, that's the gist of it.</p> <p>8 A. Correct, that would be the gist of it.</p> <p>9 Q. And your response was?</p> <p>10 A. Yes, I would - you know, if it came to be,</p> <p>11 I would consider it. Obviously, you know, salary had</p> <p>12 to come in and everything else, but I said, "Yeah, I</p> <p>13 would be interested in it."</p> <p>14 Q. What's the next conversation that you had and</p> <p>15 with whom?</p> <p>16 A. I don't know. There were several</p> <p>17 conversations, but they were all with Dave and Larry</p> <p>18 both, you know, calling back and forth, but.</p> <p>19 Q. About what? Was it about salary, about the</p> <p>20 position?</p> <p>21 A. Salary, what the benefits were, you know,</p> <p>22 stuff like that. No, the position was pretty much</p> <p>23 defined. I mean, it's the flight engineer, Director</p> <p>24 of Maintenance position.</p> <p>25 Q. And this brings us up in our timeline to 2001,</p>	<p>1 A. I don't know. I don't know.</p> <p>2 Q. I mean, how did she get on his private</p> <p>3 airplane? I would imagine strangers don't just walk on,</p> <p>4 right?</p> <p>5 A. Yeah, but I don't know. I don't know what</p> <p>6 people's associations are together when, you know.</p> <p>7 Q. Okay.</p> <p>8 A. I don't know if it's business association,</p> <p>9 social associations, or what.</p> <p>10 Q. How many times --</p> <p>11 MR. PIKE: Let me object to the form of</p> <p>12 that question.</p> <p>13 MR. EDWARDS: Okay. Noted.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. How many times was she on that airplane when</p> <p>16 it was owned by Leslie Wexner?</p> <p>17 A. Not many, but I can't give you an exact.</p> <p>18 Q. Was she ever naked on the airplane?</p> <p>19 A. Not that I'm aware of.</p> <p>20 Q. I mean, that's something that you would</p> <p>21 probably remember, right?</p> <p>22 A. Well --</p> <p>23 MR. PIKE: Form.</p> <p>24 A. Yeah. I mean --</p> <p>25 Q. I'm not really trying to be funny, but I would</p>
70	72
<p>1 you think?</p> <p>2 A. Correct, that's when I hired on and</p> <p>3 actually moved to Florida was January 2001.</p> <p>4 Q. Prior to 2001, had you heard the name</p> <p>5 Ghislaine Maxwell?</p> <p>6 A. Yes.</p> <p>7 Q. How would you have heard Ghislaine Maxwell?</p> <p>8 A. She had been a passenger on the 727 once</p> <p>9 or twice.</p> <p>10 Q. The 727, I mean?</p> <p>11 A. When it was under Limited.</p> <p>12 Q. Yeah, yeah, that's the point I'm trying to</p> <p>13 make. I mean, this could get confusing on the record.</p> <p>14 It's not confusing to me, but on the record it could be</p> <p>15 because the 727 was Wexner's, then it was Epstein, so</p> <p>16 you're talking about --</p> <p>17 A. When it was under Mr. Wexner's control.</p> <p>18 Q. What year do you think that was?</p> <p>19 A. It would have been in the late '90s.</p> <p>20 Again, like I say, when - probably some time around</p> <p>21 the time - you know, had to be late '90s --</p> <p>22 Q. Did she --</p> <p>23 A. -- maybe 2000.</p> <p>24 Q. Did she seem like a friend of Leslie Wexner's</p> <p>25 to you?</p>	<p>1 assume I would remember it.</p> <p>2 A. Not that I'm aware of.</p> <p>3 Q. Do you remember her bringing other girls on</p> <p>4 the airplane with her?</p> <p>5 A. No.</p> <p>6 Q. You remember her getting on the airplane</p> <p>7 alone?</p> <p>8 A. I can't say for sure.</p> <p>9 Q. Alright. Maybe this will jog your --</p> <p>10 A. I mean, she was never just alone-alone.</p> <p>11 Like the only passenger or.</p> <p>12 Q. Yes.</p> <p>13 A. No, no, always with - when other people</p> <p>14 were on board.</p> <p>15 Q. And you just can't remember whether she</p> <p>16 brought on board with her a male or a female; is what</p> <p>17 you're saying, right?</p> <p>18 A. No, I mean -- Restate the question. How</p> <p>19 did you --</p> <p>20 Q. Sorry.</p> <p>21 A. Define "alone."</p> <p>22 Q. I don't mean, you know, if there's 15</p> <p>23 passengers and she gets on. I'm saying: Do you remember</p> <p>24 her getting on and being accompanied by - either they</p> <p>25 took the same car to the airport, they walked the runway</p>

73	75
<p>1 up to the airport? Do you remember her being with 2 somebody else?</p> <p>3 A. If it would have been, would have been Mr. 4 Epstein, never --</p> <p>5 Q. How many times do you think Mr. Epstein was on 6 that airplane?</p> <p>7 A. I can't say for sure - not that many.</p> <p>8 Q. Less than five?</p> <p>9 A. That I saw him, yes, probably.</p> <p>10 Q. And how many times of all --</p> <p>11 MR. REINHART: Can I just clarify? You 12 mean during the time Mr. Wexner owned the 13 plane --</p> <p>14 MR. EDWARDS: Right, right, right.</p> <p>15 MR. REINHART: -- since Mr. Epstein bought 16 the plane.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. Alright. We're not up to the point, we're 19 about to be, but we're not up to the point yet where Mr. 20 Epstein takes control, so.</p> <p>21 A. I mean, you have to understand, Mr. - 22 during this time period, Mr. Epstein had his other - 23 he already owned his other airplane.</p> <p>24 Q. How did you know that?</p> <p>25 A. Well, because that's what Larry and Dave</p>	<p>1 A. Maybe mid-'90, early '90.</p> <p>2 Q. We're talking --</p> <p>3 A. He didn't have that plane very long.</p> <p>4 Q. Between '90 and '93, you're saying.</p> <p>5 A. Probably, yes.</p> <p>6 Q. And between '90 and '93, if we use those 7 years, you're familiar with the name "Jeffrey Epstein." 8 A. Not until later when he bought the 9 Gulfstream in - later when he was, you know, like I 10 said, late '90, probably.</p> <p>11 Q. But you're aware that David Rodgers and 12 Visoski are flying an airplane between '90 and '93 that's 13 owned by somebody.</p> <p>14 A. Correct. Yeah.</p> <p>15 Q. But you don't know the name of the person --</p> <p>16 A. Correct. Right.</p> <p>17 Q. -- that is the owner. We're good. We're on 18 the same page.</p> <p>19 '88, you start working for Leslie Wexner.</p> <p>20 A. Right.</p> <p>21 Q. And the first time Epstein is on Leslie 22 Wexner's airplane is approximately when?</p> <p>23 MR. REINHART: It's asked and answered.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. That you remember.</p>
<p>74</p> <p>1 were flying - the Gulfstream.</p> <p>2 Q. But this is something you found out 3 afterwards.</p> <p>4 A. No, no. I knew that they had gotten a job 5 with him and they were flying the Gulfstream.</p> <p>6 Q. Alright. Let me clarify this real quickly. 7 You got the job in 1988 with Wexner.</p> <p>8 A. Right.</p> <p>9 Q. Right. Larry Visoski and David Rodgers are 10 flying a plane that is presumably owned by Jeffrey 11 Epstein and/or one of his corporations.</p> <p>12 A. Not at first.</p> <p>13 Q. At some point in time.</p> <p>14 A. Correct.</p> <p>15 Q. And what point in time do you become aware 16 that that's happening?</p> <p>17 A. I can't remember exactly when they bought 18 the Gulfstream. They actually had a Hawker for a 19 short period. I don't know when that was.</p> <p>20 Q. Was that also owned by Jeffrey Epstein?</p> <p>21 A. For a very short period, and he traded it.</p> <p>22 Q. The first Epstein plane that you're aware of 23 is that Visoski and Rodgers are on --</p> <p>24 A. Was a Hawker.</p> <p>25 Q. -- was approximately what year?</p>	<p>76</p> <p>1 MR. REINHART: Asked and answered.</p> <p>2 A. I can't -- The only time I would remember 3 - we've already answered this several times - was in 4 the late '90s when I was actually on the airplane. I 5 have no idea if he was on previous times without me 6 there.</p> <p>7 Q. And when he is on the airplane, is he on the 8 airplane with young girls?</p> <p>9 MR. REINHART: It's also been asked and 10 answered.</p> <p>11 A. No.</p> <p>12 Q. Now we're back to Ghislaine Maxwell, and I 13 believe your answer - which led me back to these 14 questions that I had previously asked, "Was Ghislaine 15 Maxwell on the airplane that Wexner owned that you know 16 of?" - and I think your answer was, "With Epstein."</p> <p>17 MR. PIKE: Form.</p> <p>18 A. I would -- I would say if she was on 19 there, it would be with him. I never knew -- I would 20 not think that she would fly on it without him.</p> <p>21 Q. Do you specifically remember her on the 22 airplane with him?</p> <p>23 A. Can't say - I can't.</p> <p>24 Q. On any of these flights that Jeffrey Epstein 25 and/or Maxwell was on, did they fly internationally?</p>

<p style="text-align: center;">77</p> <p>1 A. I know I brought her back one time from 2 England, I believe - I remember that - from London. 3 Q. Brought Maxwell back from London, and was she 4 alone then? 5 A. I can't -- I can't say. I can't remember. 6 Q. I thought you said that if she was on the 7 plane it wouldn't have been alone. 8 A. More than likely she would have been with 9 Jeffrey. 10 Q. So do you think that you brought Maxwell and 11 Jeffrey together back from London? 12 A. More than likely, but I can't say for 13 sure. I can't remember if he was on that flight. 14 Q. To the best of your recollection right now, as 15 we sit here, is that Maxwell was on the plane and Epstein 16 may or may not have been? 17 A. Correct. That's correct. 18 Q. What year are we talking about and whose 19 airplane are we talking about? 20 A. That would have been when the 727 was 21 still Limited - or Wexner. 22 Q. And that would have been around what year? 23 A. 2000, maybe. 24 Q. 2000? 25 A. '99, something like that.</p>	<p style="text-align: center;">79</p> <p>1 the Court to be well aware that not all of my 2 form objections are coming through the 3 telephone. 4 MR. EDWARDS: Mike, how about this, of all 5 of the people involved, I think that you know 6 you can trust me here: If you say when we read 7 this back that you wanted a form objection, I'll 8 put it on the record right now you get it - how 9 about that? 10 MR. PIKE: Not a problem. 11 BY MR. EDWARDS: 12 Q. Alright. Have you ever looked at any of the 13 information from Customs and Immigration related to 14 flight logs? 15 A. No. 16 Q. If Customs and Immigration is the right agency 17 to take control of these documents, who is it that 18 generates the documents in terms of personnel riding upon 19 this airplane? 20 A. Captain. 21 Q. Who was the captain or who were the captains 22 that you are aware of - and try to give me years, if many 23 of them changed, to the best of your knowledge - for 24 Leslie Wexner? 25 A. Primarily it would have been Tim Staley,</p>
<p style="text-align: center;">78</p> <p>1 Q. So this is almost into the transition -- 2 A. No, I'm sorry. 3 Q. -- into it. 4 A. Let me think on the dates. 5 Q. Okay. 6 A. Yeah, I can't - I can't remember. 7 Q. Late '90s or 2000? 8 A. Late '90s. 9 Q. Who has the flight logs from late '90s? 10 A. I don't know. 11 Q. But that's something that the FAA would have, 12 right? 13 A. No. 14 MR. PIKE: Form. 15 BY MR. EDWARDS: 16 Q. Flying internationally? 17 A. I don't know if the FAA gets that. It 18 would more - most likely be Customs and Immigration. 19 MR. PIKE: Are you guys getting my form 20 objections? 21 MR. EDWARDS: Yes. We got you. 22 MR. PIKE: Thank you. Brad, I just want 23 on the record that not all of my form objections 24 are coming through, so if we have an issue with 25 this deposition - I am on the phone - and I want</p>	<p style="text-align: center;">80</p> <p>1 Jim Taylor, Rob Imlay. 2 Q. Rob? 3 A. Imlay, I-M-L-A-Y, Bill Hammond. 4 Q. Bill Hammond? 5 A. Uh-huh. 6 Q. Bill Hammond later becomes affiliated with Mr. 7 Epstein too, right? 8 A. Correct. 9 Q. We're going to get to that. 10 Have you ever been a captain? 11 A. No. 12 Q. And when you say that it's not necessary - 13 unless you're flying internationally, I know - but it's 14 not necessary to maintain a passenger manifest that 15 delineates the exact name, where are you getting that 16 information from? 17 A. I know it's not required by the FARs. 18 Q. How do you know that? 19 A. Because you can read the FARs, Part 91, 20 FAR 91, Operations. 21 Q. What's "FAR" stand for? 22 A. Federal Aviation Regulations. 23 Q. And what would be the reason not to put the 24 whole name of the person on the airplane? 25 A. I don't know. I -- I don't know.</p>

<p style="text-align: center;">81</p> <p>1 Q. Because later I'm going to show you some 2 lists, and certain people are listed by full name and 3 others are listed generically - any idea why that would 4 happen? 5 A. Unless they just don't know who it is, you 6 know, just a guess. I mean, you know, you don't want 7 to query somebody and give them the third degree if 8 it's just a guest of the boss that's, you know, 9 riding along or something. 10 Q. Well, she asked you your name before your 11 deposition and you didn't consider that the third degree 12 by any means, right? 13 A. Right, but -- 14 MR. PIKE: Objection to form. 15 A. But you're approaching your employer's 16 guest. It would be like walking into his house and 17 asking him, "Who's sitting at the dining room table?" 18 - in a way. See what I'm saying? It's just -- You 19 have to maintain -- 20 Q. But -- 21 A. -- the employee/employer relationship. 22 Q. No, no, no. I guess what I'm saying is: If 23 one of these people is Mohammed Atta, you would like to 24 know it, probably. 25 A. Well, yes.</p>	<p style="text-align: center;">83</p> <p>1 A. It would be obvious that these are 2 associates of some form, that they're not, you know, 3 strangers trying to board the airplane. 4 Q. So let's go back to that conversation that you 5 have in the Ohio hangar, or whatever it is, with David 6 Rodgers and Larry Visoski when they talked to you for the 7 first time about possibly switching over to Mr. Epstein. 8 A. Uh-huh. 9 Q. How does that conversation really go about? 10 MR. PIKE: Form. 11 A. I don't understand. What do you mean, 12 "How did it go about?" 13 Q. Did you approach them and say, "Hey, are you 14 going to stay here forever with this airplane?" or "Do 15 you have another job for me?" or what? 16 A. I think it was just, you know, I believe 17 Larry approached me. I can't remember. It was that 18 long ago, but -- 19 Q. What does Larry say to you? 20 A. I can't remember the exact conversation. 21 Q. I mean, was he not happy where he was? 22 A. Who, Larry? 23 Q. Yes. 24 A. Never said he wasn't. 25 Q. How did you know Larry?</p>
<p style="text-align: center;">82</p> <p>1 MR. PIKE: Form. 2 A. Yes, yes. 3 Q. So any reason why a captain trying to secure 4 the airplane and the people aboard wouldn't take that 5 extra step and try to figure out who's exactly on his 6 airplane? 7 A. Well, when it's - the normal passenger 8 loads are five to ten people, at the very most, and 9 they're all with the owner and accompanying the owner 10 and some of the regular passengers, you know; the 11 likelihood that Mohammed Atta is going to sneak in 12 there and board his plane and ride along is - you 13 know. 14 Q. He's willing to play those odds, okay. 15 A. Well, I'm not saying that he's playing 16 odds. I'm just stating that the only reason I can 17 think -- I don't know. I've never filled those out. 18 The only reason I can think is he just didn't have 19 the name and didn't want to intrude and ask. 20 Q. If you were a captain, would you ask who was 21 on your airplane? 22 A. Not if the situation was that it was 23 controlled by the owner and I knew who the - you 24 know. 25 Q. Okay.</p>	<p style="text-align: center;">84</p> <p>1 A. What are you talking about? Why would he 2 not be happy where he was? I don't understand. 3 Q. Well, he's working for some other corporation 4 that's not non-Epstein owned. 5 A. Oh, that previous corporation sold the 6 airplane. 7 Q. Oh, they did? 8 A. Yeah. He had no choice. They were out of 9 work. 10 Q. So Larry and David were about to be out of 11 work. 12 A. Yes. 13 Q. So they said, "Hey, we found a new job and 14 it's with this guy Jeffrey Epstein and he's buying that 15 plane. Do you want to be involved?" 16 A. No, no. There was another airplane in 17 between - two other airplanes. There was a long time 18 between - and I don't know the exact dates and I 19 don't know that I even do know the dates - but there 20 was a time between when they left Glimcher before 21 Jeffrey got involved with the 727. 22 Q. So they leave Glimcher? 23 A. Yes. 24 Q. Then what happens? 25 A. They somehow - I don't know how - hired on</p>

85	87
1 with Jeffrey.	1 Q. Before your conversation with them about
2 Q. They hired on with Jeffrey to pilot the 727?	2 becoming involved with Jeffrey Epstein.
3 A. No. He had two other airplanes prior to	3 A. Yes.
4 that. He had a Hawker that he had for a very short	4 Q. How?
5 period and then he bought - traded it or sold it. I	5 A. Like we discussed. We've been through
6 don't know what he did with it, but then he got the	6 this already. When they were at Glimcher they had an
7 Gulfstream.	7 airplane in the hangar. We would see them
8 Q. So Larry Visoski and David Rodgers were pilots	8 sporadically and we would talk.
9 for Jeffrey Epstein when he had the Hawker also?	9 Q. I'm sorry, bad question. I don't mean on a
10 A. Yes.	10 business relationship. On a social relationship, did you
11 Q. And what year are we talking about there?	11 hang out with them --
12 A. I have no idea.	12 A. Oh, no.
13 Q. Well, if you sign on with him in '91, it's	13 Q. -- outside of this?
14 before that year, right?	14 A. No, no.
15 A. No, no, I signed in '01 - January '01.	15 Q. I apologize.
16 Q. '01.	16 So - and I only asked that question because
17 A. I don't know how long they flew for	17 some years later then you're in contact with them and
18 Glimcher before that airplane went away and how quick	18 they asked you to become involved with Jeff Epstein.
19 they got on with Jeffrey. I don't know. Somewhere	19 A. Uh-huh.
20 between '88 and 2001, they --	20 Q. But that is because of a business relationship
21 Q. During --	21 solely that you had with them --
22 A. -- left Glimcher and --	22 A. Oh, yeah.
23 Q. During '88 and '01, do you remain in contact	23 Q. -- years before?
24 with Larry Visoski and David Rodgers?	24 A. I didn't know them personally.
25 A. On and off. They eventually moved, you	25 MR. PIKE: Form.
86	88
1 know, to - moved away from Columbus when they hired	1 BY MR. EDWARDS:
2 on with Jeffrey, so they weren't in the hangar every	2 Q. Okay. Alright. So in 2001, is that the year
3 day.	3 that you get a telephone call from one or two of these
4 Q. Where did they go - do you know?	4 people?
5 A. I think Dave went to New York and Larry	5 MR. PIKE: Form.
6 went back to South Florida.	6 A. It would be either late 2000 or early
7 Q. Do you know why?	7 2001. I don't -- These transactions don't happen
8 A. Well, because I think Jeffrey gave them	8 overnight --
9 the choice of living where they would like, I	9 Q. Yeah.
10 believe. I mean, that's --	10 A. -- buying an airplane. So it could have
11 Q. That's what they've said.	11 happened in, you know, November or started talking in
12 A. That's what they've said.	12 November, like, "Well, you know, would you be
13 Q. Okay, and Larry chose South Florida, David	13 interested if Jeffrey gets the airplane or buys the
14 Rodgers chose New York?	14 airplane?" you know, to when I actually hired on.
15 A. Right.	15 Q. Did you ever talk to Ghislaine Maxwell - ever?
16 Q. And Epstein had a place for them both wherever	16 A. After I had hired on, yes.
17 they wanted to go?	17 Q. After you hired on with Epstein.
18 A. Well, they owned their own homes or	18 A. Yes.
19 something. I don't know what their living	19 Q. We'll go up to her.
20 arrangements were.	20 So when is it that you hired on with Jeffrey
21 Q. Did you know Larry Rodgers or David Visoski	21 Epstein?
22 before this?	22 A. I think I began in January of '01.
23 A. Before?	23 Q. In January of '01, do you start getting a
24 MR. PIKE: Form.	24 paycheck from Jeffrey Epstein?
25 BY MR. EDWARDS:	25 A. Yes.

<p style="text-align: center;">89</p> <p>1 Q. And is it paid from one of his companies or 2 from Jeffrey Epstein specifically? 3 A. No, no - JEGE. 4 Q. JEGE. What is your understanding as to what 5 that is? 6 A. It's just initials. It's a name. I don't 7 have any idea what it stands for, but I'd ask that a 8 million times. 9 Q. It's a company that owns something, right? 10 A. I don't know -- 11 MR. PIKE: Form. 12 A. -- if it even owns anything. I don't know 13 what type of company it is. I don't know if -- It's 14 just a Wilmington, Delaware, company. 15 Q. What's the bank account that it was written 16 on? 17 A. I can't remember. I mean, I know I'd read 18 - I'd see "JEGE" on it, that's all. 19 Q. A New Mexico bank, New York bank, Florida 20 bank? 21 A. I have no idea because it's direct 22 deposit. All I would do is just see if the amount's 23 right. I don't -- I have no idea. I would -- I have 24 no idea. 25 Q. What was your communication - direct</p>	<p style="text-align: center;">91</p> <p>1 perform. 2 Q. On what planes? 3 A. Just the Gulf - just the Boeing. 4 Q. Just the Boeing? 5 A. Uh-huh. 6 Q. Over the years, did you become aware that he 7 owned other aircraft? 8 A. I knew that he still had that. 9 MR. PIKE: Form. 10 A. He still had the Gulfstream. 11 Q. At the time back in 2001 - and we're going to 12 walk through some of his airplanes - he owned the Boeing 13 727, right? 14 A. Correct. 15 Q. And what other airplanes did he own at that 16 time when you signed on with him in 2001? 17 A. The Gulfstream. 18 Q. Gulfstream is what? 19 A. 2B. 20 Q. Do you know who the pilot was for that plane? 21 A. Dave and Larry, I mean, it's always. 22 Q. Was it always Dave and Larry no matter what 23 plane was being taken out? 24 A. Unless somebody was on vacation or in 25 school and they used contract people.</p>
<p style="text-align: center;">90</p> <p>1 communication with Jeffrey Epstein that results in your 2 employment with JEJE? 3 MR. PIKE: Form. 4 A. A conversation result in my -- Essentially 5 Larry hired me. I mean, it wasn't - it wasn't -- I 6 didn't really -- I may have had one phone 7 conversation with Jeffrey prior to actually being 8 hired and the next time I saw Jeffrey was when I was 9 in Florida with the airplane. 10 Q. What did Jeffrey ask you in that one phone 11 conversation? 12 A. I think he asked me what my current salary 13 was, or something along that line, you know. 14 Q. Did he ask you what you were looking for in 15 terms of salary? 16 A. Yes. 17 Q. What did you tell him? 18 A. I told him to basically -- I forget how it 19 went exactly. It ended up being like \$117,000, 20 something like that. 21 Q. \$117,000 a year? 22 A. Yeah. 23 Q. And what were your duties? 24 A. Basically - flight engineer, obviously, 25 but all line maintenance and scheduled maintenance to</p>	<p style="text-align: center;">92</p> <p>1 Q. What was the purpose behind having multiple 2 planes - used one for the purpose, one for another - do 3 you know? 4 A. I never could figure that out. 5 Q. Really? 6 A. Yeah. 7 Q. No rhyme or reason why he took one this way 8 and one that way? 9 A. No. He was - pretty much once the Boeing 10 got on line. Now, you know, the Boeing goes down for 11 heavy maintenance. It used to go annually, now it 12 goes down bi-annually, but - so he would utilize that 13 airplane while it was out of service, you know, for 14 maintenance, which sometimes would be four, five 15 weeks at a time, so. 16 Q. And in those cases, then he would use the 17 Gulfstream 2B? 18 A. Yes. 19 Q. Have you been on both planes? 20 A. Yes. 21 Q. We're still talking about 2001. Is that the 22 first time that you're on the 727? 23 A. First time I was on the 727? Wait. I 24 don't know what you mean. 25 Q. After Epstein owns it.</p>

93	95
<p>1 A. Yes.</p> <p>2 Q. And do you remember where you went?</p> <p>3 A. Very first flight, no, because we didn't</p> <p>4 fly it immediately. We upgraded some avionics and</p> <p>5 did modifications.</p> <p>6 Q. What modifications did he want to that plane?</p> <p>7 A. Just changed the carpet and some fabrics,</p> <p>8 upgraded the radar, upgraded the navigation - the</p> <p>9 flight manifest systems.</p> <p>10 Q. Did he change the interior at all?</p> <p>11 A. No. We removed that one small table and</p> <p>12 chair - that's it, but we did not really change what</p> <p>13 you would consider the floor plan.</p> <p>14 Q. Now, try to give me a visual appreciation of</p> <p>15 the inside of the plane. If I'm looking out the cockpit</p> <p>16 back towards the back of the plane; what am I going to</p> <p>17 see?</p> <p>18 A. A door.</p> <p>19 Q. That's it?</p> <p>20 A. That's it, yeah.</p> <p>21 Q. Just an empty room with a door?</p> <p>22 A. No, no. The door's always closed. If the</p> <p>23 door's open you will see the forward salon, and in</p> <p>24 the forward salon there is a conference table, a</p> <p>25 high/low table, some divans, and some single seats.</p>	<p>1 A. Can't remember the first flight. Like I</p> <p>2 say, it was down for a while - probably - I think it</p> <p>3 was - had to take at least three to four months maybe</p> <p>4 to get it --</p> <p>5 Q. And did you know of him flying on the airplane</p> <p>6 with girls accompanying him?</p> <p>7 MR. PIKE: Form.</p> <p>8 A. I don't --</p> <p>9 Q. Back in 2001.</p> <p>10 A. With girls accompanying him?</p> <p>11 Q. Yes.</p> <p>12 A. Yes.</p> <p>13 Q. Where would he pick the girls up from?</p> <p>14 MR. PIKE: Form.</p> <p>15 A. I don't know. They would arrive with him,</p> <p>16 you know, out of Palm Beach or out of New York. I</p> <p>17 don't even remember where we went the first time.</p> <p>18 The first flight was probably New York, I think.</p> <p>19 Q. Is it a private airport in New York where you</p> <p>20 would usually pull into or a commercial airport?</p> <p>21 A. I think the first time we started going up</p> <p>22 there, I think, we were using White Plains, which is</p> <p>23 - actually, it's not a private airport. They all</p> <p>24 have some commercial service. It would have been</p> <p>25 White Plains, I believe, then later we started using</p>
94	96
<p>1 Q. What's behind that?</p> <p>2 A. The galley.</p> <p>3 Q. The what?</p> <p>4 A. The kitchen - galley.</p> <p>5 Q. Okay.</p> <p>6 A. Behind that is the aft salon, which is</p> <p>7 just two round divans.</p> <p>8 Q. And?</p> <p>9 A. After that is the office, which is a -</p> <p>10 consists of a credenza and a desk, or divan and a</p> <p>11 desk and chairs.</p> <p>12 Q. How many of these areas can you close off or</p> <p>13 partition?</p> <p>14 MR. PIKE: Form.</p> <p>15 A. Each one. And after that there's the</p> <p>16 state room.</p> <p>17 Q. And in the state room - how big is the state</p> <p>18 room?</p> <p>19 A. Consists of a queen size bed and two</p> <p>20 single seats.</p> <p>21 Q. Have you ever been back in the state room?</p> <p>22 A. Oh, yes. Yeah.</p> <p>23 Q. When's the first time you flew on the airplane</p> <p>24 with Jeffrey Epstein back in 2001, after he acquired the</p> <p>25 727?</p>	<p>1 Kennedy, and the service was so terrible in Kennedy</p> <p>2 and so expensive we went to Newark.</p> <p>3 Q. When you would fly into White Plains or to</p> <p>4 Kennedy or Newark, would you always get off of the</p> <p>5 airplane or would you sometimes stay on and wait for</p> <p>6 passengers to board?</p> <p>7 A. I don't understand.</p> <p>8 Q. Well, when you stop an airplane --</p> <p>9 A. Right.</p> <p>10 Q. -- sometimes you get off the airplane and you</p> <p>11 go either through a, you know, through the airport or you</p> <p>12 go somewhere else, or your option is to stay on the</p> <p>13 airplane and not get off and wait for other people to get</p> <p>14 on before you take off.</p> <p>15 A. Oh, no.</p> <p>16 MR. REINHART: I'm sorry, can we clarify</p> <p>17 the "you"? Do you mean him personally or the</p> <p>18 people who were passengers on the plane that he</p> <p>19 was flying?</p> <p>20 Q. I'm talking about you personally.</p> <p>21 A. Oh, no, it was rare that we ever did a</p> <p>22 through flight. We would normally go from Point A to</p> <p>23 Point B, and that was the destination.</p> <p>24 Q. I assume when he buys the plane initially it</p> <p>25 was in Ohio, right?</p>

97	<p>1 A. Well, yeah, but --</p> <p>2 Q. Then you fly to Florida.</p> <p>3 A. Well, we crewed it to Florida and then it</p> <p>4 sat at a facility in Florida during negotiations, so</p> <p>5 it didn't go directly from Ohio.</p> <p>6 Q. In 2001, when there's still negotiations,</p> <p>7 where in Florida is the airplane?</p> <p>8 A. Lake City - Timco, Lake City.</p> <p>9 Q. During the negotiations, does it ever take off</p> <p>10 or is it grounded?</p> <p>11 A. No, no, it's grounded, because on a Part</p> <p>12 91 deviation it has to be under a specific</p> <p>13 maintenance program, so when it left The Limited, it</p> <p>14 left that maintenance program, and I had to</p> <p>15 transition it to the new program.</p> <p>16 Q. This is still sometime in 2001, right?</p> <p>17 A. Early, yes, yes.</p> <p>18 Q. And then it passes all inspections, I'm</p> <p>19 assuming?</p> <p>20 A. Right, right.</p> <p>21 Q. Then you take it to what airport to where</p> <p>22 it --</p> <p>23 A. PBI.</p> <p>24 Q. PBI?</p> <p>25 A. Here in West Palm.</p>	99	<p>1 Q. Who's on the airplane?</p> <p>2 A. Well, obviously it would be Jeffrey.</p> <p>3 Q. Right.</p> <p>4 A. I can't remember who all went.</p> <p>5 Q. Who were the pilots?</p> <p>6 A. I can't remember that either.</p> <p>7 Q. Larry?</p> <p>8 A. No.</p> <p>9 MR. REINHART: Hold on.</p> <p>10 A. It would have been myself, for sure -</p> <p>11 because I was the only one with experience on the</p> <p>12 airplane - myself, Dave, I believe, would have been</p> <p>13 captain because he had been schooled, but I can't</p> <p>14 remember if Larry took first flight or not. I think</p> <p>15 he was still in training.</p> <p>16 Q. Where did you go?</p> <p>17 A. I can't remember.</p> <p>18 MR. PIKE: Form.</p> <p>19 A. I can't remember if it was New York or --</p> <p>20 I would imagine it would be New York, but I can't</p> <p>21 remember.</p> <p>22 Q. When you say you would imagine New York, I'm</p> <p>23 getting the impression that many of the flights went to</p> <p>24 and from New York.</p> <p>25 A. Yeah, primarily.</p>
98	<p>1 Q. While it's at PBI airport, does it take off</p> <p>2 from there?</p> <p>3 A. No, not for -- That's when we were doing</p> <p>4 the modifications and upgrades. We were doing the</p> <p>5 avionics.</p> <p>6 Q. How long did that take?</p> <p>7 A. I don't remember the exact time - maybe</p> <p>8 three to four months.</p> <p>9 Q. Who does it with you?</p> <p>10 A. Jet Aviation. Jet aviation did the</p> <p>11 avionics and soft goods.</p> <p>12 Q. And when you say the "soft goods," what do you</p> <p>13 mean by that?</p> <p>14 A. Carpet, fabrics, leather, you know,</p> <p>15 different things like that.</p> <p>16 Q. When's the first time it takes off then on a</p> <p>17 real flight - some time in 2001, but mid-year or</p> <p>18 something?</p> <p>19 A. Probably mid-year, maybe a little earlier</p> <p>20 than mid-year.</p> <p>21 Q. We're talking about June of 2001?</p> <p>22 A. Right.</p> <p>23 Q. And where do you go?</p> <p>24 A. Can't remember. I can't remember for</p> <p>25 sure.</p>	100	<p>1 Q. So if --</p> <p>2 A. And --</p> <p>3 Q. So any time you're having to guess where it's</p> <p>4 going, you're saying New York because that's the primary</p> <p>5 place it's going.</p> <p>6 A. Correct. I would have remembered -- I --</p> <p>7 I know I didn't get -- I had heard about St. Thomas,</p> <p>8 but I hadn't been there right away. I didn't get to</p> <p>9 go to St. Thomas for a while.</p> <p>10 Q. That's later on in the story.</p> <p>11 A. Yes.</p> <p>12 Q. We'll get there.</p> <p>13 So you go to New York. Does he tell you the</p> <p>14 purpose behind going to New York?</p> <p>15 A. No.</p> <p>16 Q. Prior to this trip to New York, have you had a</p> <p>17 personal conversation with Jeffrey Epstein?</p> <p>18 A. No.</p> <p>19 MR. PIKE: Form.</p> <p>20 BY MR. EDWARDS:</p> <p>21 Q. Never?</p> <p>22 A. Not personal. Everything is</p> <p>23 business-related.</p> <p>24 Q. Okay, but --</p> <p>25 A. I mean, it was about the interior work or</p>

101	103
<p>1 the avionics going in, but never personal.</p> <p>2 Q. But, I mean, you've been hired by him --</p> <p>3 A. Right.</p> <p>4 Q. -- you agreed on a salary, he's going to pay</p> <p>5 you the salary, but other than that, and what maintenance</p> <p>6 may be required --</p> <p>7 A. Correct.</p> <p>8 Q. -- on the airplane, nothing else?</p> <p>9 A. He's a very -- His conversations are</p> <p>10 usually very short. He doesn't, you know, take much</p> <p>11 time.</p> <p>12 Q. When you would have conversations with him,</p> <p>13 would they be over the telephone or would they be in</p> <p>14 person?</p> <p>15 A. It could be in both. If he was in Florida</p> <p>16 and I wanted to actually show him a fabric or a</p> <p>17 sample for the airplane or he wanted to view how it</p> <p>18 was coming, but oftentimes it would be via telephone</p> <p>19 from New York.</p> <p>20 Q. When it would be in person, would you see him</p> <p>21 surrounded by or be accompanied by a girl or girls?</p> <p>22 MR. PIKE: Form.</p> <p>23 A. At times, yeah.</p> <p>24 Q. Would any of those girls be Ghislaine Maxwell?</p> <p>25 A. At times, yes.</p>	<p>1 know, business relationship too.</p> <p>2 Q. Did you know who Ghislaine Maxwell was?</p> <p>3 A. Not right away, no, no.</p> <p>4 Q. Not right away?</p> <p>5 A. Right.</p> <p>6 Q. At some point in time you were curious enough</p> <p>7 to make an attempt to find out.</p> <p>8 A. No, I --</p> <p>9 MR. PIKE: Form.</p> <p>10 A. -- heard about her and there was a book up</p> <p>11 in New York in the apartment that we stayed in that</p> <p>12 was -- You know, you're sitting there with nothing to</p> <p>13 do, I read that.</p> <p>14 Q. Do you remember the name of the book?</p> <p>15 A. It was just "Maxwell."</p> <p>16 Q. Have anything to do with her father?</p> <p>17 A. Yeah, it was about him, that's what it was</p> <p>18 about. I mostly just flipped through looking at</p> <p>19 pictures, boats, and airplanes and stuff.</p> <p>20 Q. Back in 2001, the first time you had a real</p> <p>21 conversation with Ghislaine Maxwell --</p> <p>22 MR. PIKE: Form.</p> <p>23 A. Yes.</p> <p>24 Q. -- what did that conversation consist of, if</p> <p>25 you remember?</p>
<p>102</p> <p>1 Q. Would any of those girls look extremely young</p> <p>2 to you?</p> <p>3 MR. PIKE: Form.</p> <p>4 A. Not -- Not that I thought.</p> <p>5 Q. Not back in 2001, we're talking about?</p> <p>6 A. Right, right.</p> <p>7 Q. No.</p> <p>8 What would Ghislaine Maxwell say to you, if</p> <p>9 anything?</p> <p>10 MR. PIKE: Form.</p> <p>11 A. She'd -- Mostly small talk, just -- She</p> <p>12 kind of did the business management part of it as far</p> <p>13 as, you know, arranging cell phone - I was having</p> <p>14 cell phone problems with the company cell phone, she</p> <p>15 would handle things like that, but she would have</p> <p>16 minor inputs on the interior work.</p> <p>17 Q. What was your understanding back in 2001 still</p> <p>18 of the relationship between Ghislaine Maxwell and Jeffrey</p> <p>19 Epstein?</p> <p>20 MR. PIKE: Form.</p> <p>21 A. I really didn't understand it. I thought</p> <p>22 it was personal - personal and business.</p> <p>23 Q. When you say "personal," did you think it was</p> <p>24 sexual?</p> <p>25 A. I thought maybe they were dating and, you</p>	<p>104</p> <p>1 A. I think it was concerning getting a cell</p> <p>2 phone and a pager - that's it.</p> <p>3 Q. Did it have anything to do with underage</p> <p>4 girls?</p> <p>5 A. Absolutely not, no, no.</p> <p>6 Q. That's not something she ever shared with you?</p> <p>7 A. No, no.</p> <p>8 Q. Did Jeffrey Epstein ever share with you that</p> <p>9 he wanted underage girls --</p> <p>10 A. No.</p> <p>11 Q. -- in any way?</p> <p>12 A. No.</p> <p>13 MR. PIKE: Form.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. I mean, certainly I'm not saying something to</p> <p>16 you that's an absolute shocker right now --</p> <p>17 A. Right.</p> <p>18 Q. -- considering the newspaper articles.</p> <p>19 A. Right, but I know -- You have to</p> <p>20 understand, every conversation I had was pretty much</p> <p>21 business, just to deal with the airplanes. You know,</p> <p>22 I'm an employee/employer relationship.</p> <p>23 Q. I just don't want you to think I'm just asking</p> <p>24 random off the wall questions --</p> <p>25 A. Right.</p>

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1 Q. -- that have nothing to do with anything.  
 2 A. I understand.  
 3 Q. 2001, you start working for him, and that June  
 4 or so is the first flight, and you believe it's to New  
 5 York.  
 6 A. Correct.  
 7 Q. Do you remember the purpose behind the flight?  
 8 A. No, did not know the purpose.  
 9 Q. Did you get off the airplane in New York?  
 10 A. Yes, yes.  
 11 Q. Where did you go?  
 12 A. Probably to - into the city, into the  
 13 city, and he has an apartment building up there that  
 14 we would stay in in the city.  
 15 Q. Is it paid for by Jeffrey Epstein?  
 16 A. What?  
 17 MR. PIKE: Form.  
 18 BY MR. EDWARDS:  
 19 Q. The apartment.  
 20 A. Well, he -- it's -- I think it's in the  
 21 building he owns. I mean, I just -- I don't know.  
 22 Q. Do you remember the address?  
 23 A. [REDACTED].  
 24 Q. [REDACTED], right?  
 25 A. Right.

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1 Q. Did he ever mention a brother that he may have  
 2 to you?  
 3 A. I met his brother, I think, once.  
 4 Q. What's his name?  
 5 A. I can't remember.  
 6 Q. Mark?  
 7 A. I remember meeting.  
 8 Q. Mark Epstein strike --  
 9 A. Honestly, I can't say for sure.  
 10 Q. And how do you know that Jeffrey Epstein owns  
 11 the apartment building at [REDACTED]?  
 12 A. Larry told me. I mean, it was just kind  
 13 of known.  
 14 Q. Larry told you --  
 15 A. Yeah.  
 16 Q. -- or Jeffrey told you?  
 17 A. Oh, no, not Jeffrey, no. Larry. I  
 18 wouldn't have asked Jeffrey.  
 19 Q. How many of those apartments up there in New  
 20 York is it your understanding that Jeffrey owns?  
 21 MR. REINHART: I'm sorry, are you asking  
 22 how many units are in the building or how many  
 23 buildings?  
 24 BY MR. EDWARDS:  
 25 Q. No, how many units that Jeffrey owns in the

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1 building. I've been to the building. The building is  
 2 huge.  
 3 A. I don't know. I don't know if he owns the  
 4 building or just - or how many units he's got. Maybe  
 5 ten, because I think some of the employees up there  
 6 live in them.  
 7 Q. Do you remember who some of the other  
 8 employees are that live in that building?  
 9 A. Well, I think Darren used to live in it,  
 10 Darren Indyke.  
 11 Q. Darren Indyke, right.  
 12 What about [REDACTED], do you remember her?  
 13 A. [REDACTED] lived in there.  
 14 Q. What about [REDACTED]?  
 15 A. I don't know if [REDACTED] lived in there or  
 16 not.  
 17 Q. You know who that is, though.  
 18 A. Right, right. Actually, she was just kind  
 19 of coming into the picture when I was - about the  
 20 time when I was leaving.  
 21 Q. What about Ghislaine Maxwell?  
 22 A. No, no, she didn't live there.  
 23 Q. What about Jean Luc Brunel?  
 24 A. No.  
 25 Q. How about: Did Mark Epstein ever indicate to

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1 you that he had any ownership in any of that?  
 2 A. Oh, no. I only saw him one time on a  
 3 short flight. I don't even know where we - we were  
 4 probably taking him to and he was just - Jeffrey  
 5 introduced him as his brother and it was very short,  
 6 you know, just, "Oh, hi. How are you?", and he went  
 7 in the back.  
 8 Q. Do you know anything about the guy?  
 9 A. Uh-uh.  
 10 Q. Nothing?  
 11 A. Nothing.  
 12 Q. So in 2001, there's a flight up there at some  
 13 appointment in time, and you get off and you stay at one  
 14 of the apartment buildings at [REDACTED].  
 15 A. Right, right.  
 16 Q. And did you meet any of the neighbors of the  
 17 apartments that are also owned by Jeffrey Epstein?  
 18 A. No, no, because when we're there it's  
 19 usually just for a night or something and then, you  
 20 know, we're either airlining home or going on.  
 21 Q. How did you know Darren Indyke?  
 22 A. He's our -- He's our business attorney for  
 23 JEJE.  
 24 Q. Do you remember any of the other tenants of  
 25 the apartments at [REDACTED] other than Darren

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1 Indyke and [REDACTED]?

2 A. Not that I remember, no.

3 Q. How about Leslie Groff?

4 A. I don't think Leslie lived there.

5 Q. Do you remember that name?

6 A. Yes. She's Mr. Epstein's secretary.

7 Q. What about [REDACTED]?

8 A. [REDACTED], no, I don't think so.

9 Q. Jeff Fuller?

10 A. I don't know Jeff Fuller. I don't even

11 know Jeff Fuller.

12 Q. Do you know the name Jean Luc Brunel?

13 A. Yes.

14 Q. How do you know that name?

15 A. He's been -- He was a passenger on a few

16 of our flights.

17 Q. Do you know why?

18 A. I think he was -- I don't know for sure.

19 He's in a modeling business with Mr. Epstein, I

20 believe.

21 Q. MC2? Do you know that name - MC2 Modeling

22 Agency - used to be Karin Modeling Agency, now it's MC2?

23 A. No.

24 Q. How do you know about his and Mr. Epstein's

25 modeling agency? How do you know that?

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1 A. Just every once in a while he would say

2 something about, you know, one of the model shoots or

3 something. We normally had him on - we would take

4 him back and forth to Paris.

5 Q. Where some of their models come from?

6 A. I don't know.

7 Q. Did you ever bring some of the Paris models

8 back?

9 A. Not that I'm aware of, no.

10 MR. PIKE: Form.

11 BY MR. EDWARDS:

12 Q. So he would go to Paris on the airplane, Jean

13 Luc, would you drop him off there or would you pick

14 people up and bring them back?

15 A. If I remember, normally we were bringing

16 Jean Luc from Paris to New York, if I remember.

17 Q. And when you say that the modeling agency -

18 obviously that, you know, between him and Mr. Epstein -

19 is that something that Mr. Epstein would talk to you

20 about or is that something that Jean Luc would talk to

21 you about or you would just overhear the two?

22 A. Overhear the two, or Jean Luc may say

23 something about one of the shoots or something, just

24 in general conversation.

25 Q. And what would Jeffrey's comment be about some

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1 of the MC2 shoots?

2 A. I never heard -- There was one incident --

3 The only thing I remember about it is they were on a

4 shoot - and it's not funny, but Jeff - but it is in a

5 way - they were in a motor home on location at the

6 shoot, and they started to drive off and one of the

7 models asked to use the restroom and they told her

8 which door it was and she went out the side door, so

9 grabbed the wrong door, but that's actually the only

10 thing that sticks in mind - was that one.

11 Q. Have you ever done any research on Jean Luc

12 Brunel?

13 A. No.

14 Q. Do you have any idea that he's known

15 throughout Europe as somebody who has sex with underage

16 girls?

17 A. No.

18 Q. You didn't know that until right now?

19 A. Correct.

20 Q. That's something that you're learning as a

21 surprise to you.

22 A. Yes.

23 Q. So [REDACTED] - somebody you never heard

24 of?

25 A. It sounds familiar. I'm trying to place

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1 her. I don't know if she works in the office or --

2 Q. Or worked in the office?

3 A. Worked in the office, yeah. I very rarely

4 went to the office. I mean --

5 Q. [REDACTED] - how do you know her?

6 A. From the flights - being on the airplane.

7 Q. How many times was she on the airplane?

8 A. Quite a few. Almost every.

9 Q. What's your understanding as to what she did

10 for Mr. Epstein?

11 A. Like a personal assistant.

12 Q. Personal assistant doing what?

13 A. Arrangements, meetings, handling like, I

14 guess, personal affairs, you know.

15 Q. Did Mr. Epstein ever once mention to you that

16 he likes massages?

17 MR. PIKE: Form.

18 A. No, he never mentioned that to me.

19 Q. That's not something that you ever heard of,

20 right?

21 A. Well, I --

22 Q. I mean, outside of the articles that you've

23 read.

24 A. Right. No, but he never came up to me and

25 said, "I like massages."

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1 Q. And did [REDACTED] - did you hear her  
 2 organizing, scheduling, talking to people about either  
 3 what she may call "work" or "massages" for Epstein?  
 4 A. No, no, I don't.  
 5 MR. PIKE: Form.  
 6 BY MR. EDWARDS:  
 7 Q. What types of conversation, if you can  
 8 remember anything, did you ever overhear [REDACTED]  
 9 talking about?  
 10 A. It would be mostly like transportation  
 11 arrangements - car needs.  
 12 Q. Car needs for who?  
 13 A. Well, making sure that the driver in New  
 14 York was meeting the airplane at the proper time,  
 15 stuff like that, or if they had an unusual large  
 16 amount of baggage, to make sure that another car was  
 17 hired to come pick this up, things like that -  
 18 logistic-type stuff.  
 19 Q. We're still talking about a time period back  
 20 in 2001, right, in these --  
 21 A. No. [REDACTED] - I don't remember [REDACTED] coming  
 22 into the picture until later.  
 23 Q. Later in 2000-something?  
 24 A. No, she wasn't around at first.  
 25 Q. Alright.

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1 A. No. I don't remember when exactly [REDACTED] -  
 2 but she --  
 3 Q. Who was making the arrangements for meetings  
 4 and such prior to Ms. [REDACTED] --  
 5 A. Ms. Maxwell.  
 6 Q. -- that you remember?  
 7 So Maxwell was the, for all intents and  
 8 purposes, the [REDACTED] before [REDACTED] existed?  
 9 A. For all intents and purposes, yes.  
 10 Q. And did you ever hear of Ms. Maxwell making  
 11 arrangements for massages or for girls or anything else?  
 12 A. No.  
 13 MR. PIKE: Form.  
 14 BY MR. EDWARDS:  
 15 Q. Where were the conversations - whether it was  
 16 travel or whatever else - that was occurring between  
 17 Maxwell and/or [REDACTED]? Where were they taking  
 18 place - on the airplane, some office?  
 19 A. Yeah. No, no, usually in the cockpit, you  
 20 know, prior to departure, en route stating, "We've  
 21 got this many cars and I've contacted" or "Can you  
 22 call such and such to have this brought out?"  
 23 Q. Did you ever see Epstein work a lot?  
 24 MR. PIKE: Form.  
 25 A. He always had a briefcase with him and he

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1 always sat it by his office in the back.  
 2 Q. Always had a computer?  
 3 A. No, no, it's just a large briefcase.  
 4 Q. Did you ever know his e-mail?  
 5 A. Yeah, I had it -- I can't remember what it  
 6 was and I don't think it's even current - but when I  
 7 would have to send him e-mails about the interior or  
 8 maintenance issues. It was jeprojects, or something  
 9 like that, at -- I don't know if it was at Yahoo or  
 10 gmail. I don't think it was gmail.  
 11 Q. You think it was jeprojects?  
 12 A. I believe so, but I can't remember what  
 13 service.  
 14 Q. At gmail.com or something?  
 15 A. Or something like that or Yahoo or  
 16 something.  
 17 Q. How about Ms. Maxwell?  
 18 A. It was g - gmax1@mindspring.com, I think.  
 19 Q. Do you know if that's still current?  
 20 A. No, I don't.  
 21 Q. How about [REDACTED] ?  
 22 A. I had it at one time and I know she  
 23 changed it and I don't know what it is. I can't  
 24 remember what it was, actually.  
 25 Q. Do you know [REDACTED] - where she is

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1 right now?  
 2 A. No.  
 3 Q. Do you know if she's intentionally on the lam  
 4 to try to avoid being deposed in this case?  
 5 A. No.  
 6 MR. PIKE: Form.  
 7 A. No idea. I haven't had any contact with  
 8 [REDACTED] since I stopped flying.  
 9 Q. You say that [REDACTED] was just coming in the  
 10 picture - is the words that you used. What did you mean  
 11 by this?  
 12 A. Well, I mean she was just -- I'm trying to  
 13 remember when I first started seeing her on the  
 14 airplane. I think it was not too long before I quit  
 15 flying. I can't remember the exact date.  
 16 Q. When did you stop flying?  
 17 A. In February of '07.  
 18 Q. February '07?  
 19 A. Yep.  
 20 Q. And you don't think you saw her on the  
 21 airplane until before that?  
 22 A. No, I'm saying she was only coming into  
 23 the picture like maybe six months before that or so  
 24 or -- I don't know for sure.  
 25 Q. You don't remember seeing her on the airplane

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1 in 2001, 2002, 2003?	1 A. No.
2 A. Oh, no, not that early.	2 Q. -- in the back of the airplane.
3 Q. Do you know where she came from?	3 A. No.
4 A. Just what I've read in the paper - an	4 Q. So anything could go on. You would have no
5 eastern country. I'm sorry, I don't remember the	5 idea.
6 country.	6 MR. PIKE: Form.
7 Q. Were you ever told that Mr. Epstein bought her	7 BY MR. EDWARDS:
8 from her family when she was 14 years old to come over to	8 Q. You could sit here and testify truthfully, "I
9 be his Yugoslavian sex slave - is that something that you	9 have no clue what's going on back there."
10 ever heard?	10 A. That's correct. That's correct.
11 A. No. I did read something like that in the	11 Q. Darren Indyke - what's your understanding as
12 paper, but, no, never heard of that.	12 to his involvement with Mr. Epstein?
13 Q. Did you ever see him and her sexually involved	13 A. An attorney for the company.
14 on the airplane or otherwise?	14 Q. Ever met Alan Dershowitz?
15 A. No.	15 A. I think -- Yes.
16 Q. Did you ever see Epstein involved sexually	16 Q. How did you meet him?
17 with anybody on the airplane?	17 A. Alan Dershowitz. I don't know if it was
18 A. No.	18 Mr. Goldberger or Alan Dershowitz. We brought some
19 Q. Did you ever see the airplane used for sexual	19 attorneys down --
20 purposes?	20 Q. Why?
21 A. No.	21 A. -- to Florida one time.
22 MR. PIKE: Form.	22 Q. Why?
23 BY MR. EDWARDS:	23 A. For Mr. Epstein. It was right before I
24 Q. If it had happened - considering the various	24 finished flying. For Mr. Epstein to make an
25 areas that were cordoned off or blocked off - would that	25 appearance at the courthouse or a meeting or
118	120
1 have even been something that you could have seen?	1 something, and we brought some attorneys with him.
2 A. No, no, if it was - if the doors were	2 Q. And were you aware then of the allegations
3 closed, no.	3 against Mr. Epstein?
4 Q. So there's a back room that you've described	4 A. They were starting to brew, yes.
5 that has a bed in it, and if that door's closed you don't	5 Q. Were you still actively working on his payroll
6 know what's going on behind closed doors, right?	6 at the time when the investigation was going on?
7 A. That's correct.	7 A. Yes, when it just started.
8 MR. PIKE: Form.	8 Q. And did that impact you in any way as to
9 BY MR. EDWARDS:	9 whether or not you wanted to be affiliated with this
10 Q. Do you remember a time Epstein was back in	10 person?
11 that back room with other people?	11 A. Subconsciously, it may have. And it
12 MR. PIKE: Form.	12 wasn't because of this person, but as a business
13 A. No.	13 decision, if, you know, an airplane's not needed and
14 Q. Are you saying it never happened while you	14 I don't fly, I could be out of work. But, no, the
15 were on the airplane?	15 primary reason was the fact that I did want to get
16 A. I really have no idea of knowing because,	16 off the road and back home.
17 one, we never go back there unless we're invited	17 Q. Do you have children?
18 back.	18 A. Yes.
19 Q. Okay.	19 Q. How old?
20 A. And the forward door - the very forward	20 A. A daughter 28, son 24, and a daughter 17 -
21 salon door is closed, so we never even normally go	21 all with the same bride - 31 years.
22 into that --	22 Q. I'm assuming you're aware of the factual
23 Q. So you don't really know --	23 allegations in these complaints?
24 A. -- without permission.	24 A. Yes, yes.
25 Q. You don't really know what happens --	25 Q. And you are aware that there are hundreds of

<p style="text-align: center;">121</p> <p>1 girls who are underage who claim to have had sex with Mr. 2 Epstein as well as Ms. Maxwell at various times? 3 MR. PIKE: Form. 4 A. I was only aware of -- First time I was 5 made aware of it, of the number of people, was when 6 they served me the subpoena. The deputies or 7 retired -- 8 Q. Yes. 9 A. -- private eyes told me that. That was 10 the first I had heard a number. 11 Q. Were you completely oblivious that this was 12 going on? And by "this" I mean Epstein and/or Ghislaine 13 Maxwell and/or [REDACTED] recruiting 12, 13, 14, 14 15-year-old girls to his house for sex? 15 A. Absolutely I was oblivious to it. 16 MR. PIKE: Form. 17 BY MR. EDWARDS: 18 Q. If young girls were on an airplane that you 19 were on - considering that we've now established how the 20 airplane's set up and you're kind of cordoned off - is it 21 possible that underage girls would have been on the 22 airplane and you just wouldn't have known about it? 23 MR. PIKE: Form. 24 A. No, no. I mean, people don't board the 25 airplane with - you know, and then just say, "Close</p>	<p style="text-align: center;">123</p> <p>1 Q. Okay. I'll ask it a different way. 2 A. Because we have had -- You know, he's got 3 a goddaughter and godson that were young, I mean. 4 Q. Okay. Over the years -- 5 A. I mean, I don't know what the purpose -- 6 Q. Right. I totally understand what you're 7 saying. 8 Over the years, when you were on Jeffrey 9 Epstein's airplane, were you aware between 2001 and 10 wherever you stopped, 2007 -- 11 A. Seven. 12 Q. -- were you aware of girls that appeared very 13 underage on the airplane? 14 A. No. 15 MR. PIKE: Form. 16 BY MR. EDWARDS: 17 Q. I'm not saying what was happening on the 18 airplane. I'm just saying, were you aware of it? 19 A. No, not - unless they were there, like I 20 said, his goddaughter at the time. One time - a 21 couple times we flew her with her mom and dad where I 22 don't even know their age. 23 MR. PIKE: Again, form, asked and 24 answered. 25 A. Six or seven. But, no, I was not aware of</p>
<p style="text-align: center;">122</p> <p>1 the door, we're going." You know, you see who boards 2 the airplane. 3 Q. So if there were flight records that show 4 underage girls on the airplane, you would know about it? 5 MR. PIKE: Form. 6 A. Not necessarily. 7 Q. Well, how not? 8 MR. REINHART: I'm sorry. 9 A. Well, how do you -- 10 MR. REINHART: When you say "them," do you 11 mean he would know about the records or he would 12 know about the girls allegedly on the plane? 13 BY MR. EDWARDS: 14 Q. You would know about the underage girls on the 15 airplane if they were on there. 16 MR. PIKE: Form. 17 A. How do you -- How would I know that 18 they're underage, though? 19 Q. Well, you would only know that they look 20 extremely young, right? 21 A. But -- 22 MR. PIKE: Form. 23 A. -- what is the intent of them? I mean, 24 are they guests or are they friends of his associates 25 or --</p>	<p style="text-align: center;">124</p> <p>1 anybody that was obviously, blatantly underage. 2 Q. Any famous people that you can tell me that 3 were on the airplane? 4 A. President Clinton - Ex-President Clinton. 5 Q. Were you on the airplane -- 6 A. Yes. 7 Q. -- when he was on it? 8 A. Yes. 9 Q. How many times? 10 A. Two trips. I mean, two extended trips. 11 Q. Where did it go? 12 A. The first one - or the first one was Asia. 13 Q. What purpose? 14 A. I forget what the purpose was on that one. 15 Q. Was Jeffrey Epstein on the airplane as well? 16 A. Yes, yes. 17 Q. Who else was on the airplane then? 18 A. I don't remember on that one. It was 19 primarily him and his support staff. 20 Q. Was [REDACTED] ? 21 A. Probably, yes, probably. 22 Q. When's the next time President Clinton was on 23 his airplane? 24 A. I don't remember the date, but we did a 25 Africa trip, an AIDS awareness tour. We did like ten</p>

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1 countries in 12 days.	1 MR. EDWARDS: No. I mean, unless
2 Q. Is that a time Chris Tucker --	2 everybody wants to take a lunch break.
3 A. Yes.	3 Everybody's shaking their heads, so, no, I'm
4 Q. -- and Kevin Spacey were also on it?	4 going to take a bathroom break, and it's going
5 A. Yes.	5 to be a fast one.
6 Q. In addition to the people that we've named,	6 MR. PIKE: Okay.
7 were there females on that airplane?	7 BY MR. EDWARDS:
8 A. Yes.	8 Q. In 2001, when you're on this flight to New
9 Q. And who were the females that were on the	9 York and then during that year we talked a little bit
10 airplane?	10 about it, is Larry Visoski and David Rodgers also on some
11 A. Can't remember. Ms. Maxwell, [REDACTED], I can	11 of these flights?
12 remember, and a couple others, and there's - Mr.	12 A. Most, yes.
13 Clinton had - a couple of his support staff were	13 Q. If somebody's going to keep passenger logs,
14 women also.	14 who's going to write down the names of the people? Is
15 Q. Where were you sitting during these trips?	15 that going to be you or is that somebody else's
16 A. Up front in the - my station.	16 responsibility?
17 Q. Could you see what they were doing where you	17 A. Whoever is captain.
18 were?	18 Q. So normally it's Visoski or David Rodgers?
19 A. No, no.	19 A. Correct.
20 Q. Could you tell if there was any sex going on	20 Q. Who do you turn these logs into?
21 on the airplane while you were on it?	21 MR. PIKE: Form.
22 A. No.	22 A. I don't know. I don't know where they go.
23 MR. PIKE: Form.	23 Q. You don't know the purpose behind keeping them
24 BY MR. EDWARDS:	24 or anything?
25 Q. Do you know of any underage girls being on	25 A. No.
126	128
1 that airplane or would you have been able to tell?	1 Q. As far as you're concerned, you don't even
2 A. No.	2 need to keep them.
3 MR. REINHART: I'm sorry --	3 A. Correct. Yeah.
4 MR. PIKE: Asked and answered.	4 Q. As just due diligence - going above and
5 MR. REINHART: -- are you limiting it to	5 beyond?
6 that trip?	6 A. Correct.
7 BY MR. EDWARDS:	7 Q. Today you have an attorney sitting right next
8 Q. To that trip.	8 to you, right?
9 A. No, I'm not aware of it.	9 A. Correct.
10 Q. If you had been aware of underage girls being	10 Q. Is that somebody that you've known for a long
11 transported on the airplane for the purposes of sex,	11 time?
12 would you have said something to somebody?	12 A. No.
13 A. Yes.	13 Q. You're paying for an attorney to sit here with
14 MR. PIKE: Form.	14 you?
15 MR. EDWARDS: Do you mind if we take a	15 A. No.
16 five-minute break? I just have to run to the	16 Q. Who's paying for your attorney?
17 bathroom.	17 A. Mr. Epstein.
18 MR. PIKE: Actually, Brad, can you hear	18 Q. Are you worried that you're criminally
19 me?	19 involved here or something? Is that why you need an
20 MR. EDWARDS: Yes.	20 attorney?
21 MR. PIKE: How much longer do you	21 A. No. I don't even know anything about this
22 anticipate going with this witness?	22 process, that's --
23 MR. EDWARDS: Hour, maybe a little longer.	23 Q. Oh, okay.
24 MR. PIKE: Well, are you going to take a	24 A. I'm just -- You know.
25 lunch break or what?	25 Q. How did you know that you were --

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1 MR. PIKE: Brad. Brad. Brad.	1 this case against Mr. Epstein?
2 Q. -- going to get an attorney --	2 MR. REINHART: Let me ask him not to
3 MR. REINHART: Brad, hold on.	3 answer that.
4 MR. PIKE: Whoa. Whoa. Stop.	4 MR. PIKE: Form.
5 MR. EDWARDS: I'm listening.	5 MR. REINHART: It's privileged.
6 MR. PIKE: Brad.	6 MR. EDWARDS: It's privileged between Mr.
7 MR. EDWARDS: Go.	7 Epstein and you, but is it privileged between
8 MR. PIKE: You are not allowing the	8 the two of you?
9 witness to finish his statements throughout this	9 MR. REINHART: Between Mr. Morrison and
10 entire depo. Please. I'm on the phone. You	10 me.
11 start your question before the witness is	11 BY MR. EDWARDS:
12 finished. I'm sorry for raising my voice, but	12 Q. Is it your understanding that he represents
13 you must allow the witness to finish his answer,	13 you or he represents Mr. Epstein?
14 please.	14 A. He represents me.
15 MR. EDWARDS: You got it.	15 Q. Okay. Do you think that you've done anything
16 THE WITNESS: What was your question now?	16 wrong criminally?
17 I forgot.	17 A. No.
18 MR. EDWARDS: I'm sitting here looking at	18 Q. Do you think that you're being sued civilly?
19 the witness and have a feeling we're going to be	19 A. No.
20 sitting here for 30 minutes, but I will do that	20 Q. And you have no reason to be sued civilly,
21 for you, Mr. Pike.	21 right?
22 MR. PIKE: Alright.	22 A. Correct.
23 THE WITNESS: What was the question again,	23 Q. Did you talk to Mr. Epstein prior to taking
24 please?	24 your deposition today?
25 MR. EDWARDS: Can I ask the question again	25 A. Oh, no. I haven't talked to him in well
130	132
1 or wait? I'll wait for you.	1 over a year-and-a-half, maybe two years, and that was
2 MR. PIKE: If I'm ready.	2 just a "hello" because I'm at the airplane one day.
3 MR. EDWARDS: I already asked the	3 Q. So how is it you know that Mr. Epstein paid
4 question, so we're waiting.	4 for your attorney?
5 MR. REINHART: I think the witness asked	5 MR. REINHART: It's privileged.
6 you to repeat the question.	6 MR. EDWARDS: Okay. That answers my
7 MR. EDWARDS: Are you good? Alright.	7 question.
8 BY MR. EDWARDS:	8 BY MR. EDWARDS:
9 Q. Who hired your attorney?	9 Q. Have you ever met Donald Trump?
10 A. Mr. Epstein.	10 A. Yes.
11 Q. And do you have any idea why, if you're a	11 Q. How?
12 witness in a case - no problems criminally - why you	12 A. He was -- He boarded the airplane one day
13 personally have an attorney paid for by Mr. Epstein to	13 when ours was on the ramp.
14 sit here with you?	14 Q. And did you talk to him?
15 MR. PIKE: Form.	15 A. Just he introduced himself and I
16 A. No, I don't.	16 introduced myself.
17 Q. Do you want an attorney to sit here with you	17 Q. And did he talk to Mr. Epstein?
18 while I ask you questions?	18 A. No. Mr. Epstein wasn't present. I was
19 MR. PIKE: Form.	19 doing maintenance.
20 A. I don't know what the proper protocol is.	20 Q. And did he fly on the plane?
21 Q. Okay.	21 A. No.
22 A. I have very limited exposure to anything	22 Q. Not that time?
23 like this.	23 A. Never.
24 Q. How did this come about to where you have an	24 Q. You think he never flew on the plane?
25 attorney as a witness - completely innocent witness - in	25 A. On our airplane?

<p style="text-align: center;">133</p> <p>1 Q. Yes.</p> <p>2 A. No.</p> <p>3 Q. So if somebody has given testimony other than</p> <p>4 that, you would say that person is mistaken or lying?</p> <p>5 MR. PIKE: Form.</p> <p>6 A. Donald Trump was never on the airplane</p> <p>7 when I was on the airplane.</p> <p>8 Q. Is it your understanding that Donald Trump is</p> <p>9 friends with Mr. Epstein?</p> <p>10 A. From what I've read - or associates. I</p> <p>11 don't know how that circle works.</p> <p>12 Q. What's your understanding as to who Mr.</p> <p>13 Epstein's real friends are?</p> <p>14 A. I really don't know. I don't -- I don't</p> <p>15 know. It's -- it's not like the Wexners where, you</p> <p>16 know, they were high school associates, you know,</p> <p>17 growing up.</p> <p>18 Q. Do you know what Mr. Epstein did prior to</p> <p>19 managing the money for Mr. Wexner?</p> <p>20 A. Just that he was a Wall Street broker or</p> <p>21 somebody, you know.</p> <p>22 Q. Also from reading?</p> <p>23 A. Yes, yes.</p> <p>24 Q. Do you know any personal knowledge as to what</p> <p>25 Mr. Epstein has told you about how he made money?</p>	<p style="text-align: center;">135</p> <p>1 A. I have no idea. I don't know.</p> <p>2 Q. When you say that [REDACTED] was just</p> <p>3 coming in the picture, what's your understanding as to</p> <p>4 who [REDACTED] is relative to Mr. Epstein?</p> <p>5 A. I don't know. I don't understand. I</p> <p>6 don't know. I didn't know if maybe she was like an</p> <p>7 exchange -- Jeffrey always appeared to be very</p> <p>8 involved in education and philanthropy. I didn't</p> <p>9 know if she was an exchange-type student or something</p> <p>10 or what. I don't know.</p> <p>11 Q. When you say he appeared to be "involved in,"</p> <p>12 what do you mean?</p> <p>13 A. Educational things, foundations, science</p> <p>14 foundations, and things.</p> <p>15 Q. Speaking of - the Florida Science Foundation</p> <p>16 is a place where, when he was on work release, he spent a</p> <p>17 lot of time there, you're aware of that?</p> <p>18 A. That's what I've heard, yeah.</p> <p>19 Q. What does that place do?</p> <p>20 A. I have no idea.</p> <p>21 Q. Does it do anything?</p> <p>22 A. I don't know. I don't know anything about</p> <p>23 it.</p> <p>24 Q. Certainly you've read certain newspaper</p> <p>25 articles about the allegations, police reports,</p>
<p style="text-align: center;">134</p> <p>1 A. He's never --</p> <p>2 MR. PIKE: I'm going to move to strike any</p> <p>3 responses relative to what the witness has</p> <p>4 learned from reading.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. And so that is why I asked the question: Has</p> <p>7 Mr. Epstein told you? Which would have nothing to do</p> <p>8 with reading.</p> <p>9 A. No.</p> <p>10 Q. How many conversations have you personally had</p> <p>11 with Mr. Epstein?</p> <p>12 A. No personal conversations - all business.</p> <p>13 Q. Have you witnessed Mr. Epstein with any girls</p> <p>14 that look to be under the age of 18?</p> <p>15 A. No.</p> <p>16 Q. Have you witnessed Mr. Epstein with</p> <p>17 young-looking girls that appear to be in their twenties?</p> <p>18 MR. PIKE: Form.</p> <p>19 A. Yes.</p> <p>20 Q. On how many occasions?</p> <p>21 A. Probably several.</p> <p>22 Q. And how did that come about?</p> <p>23 A. I mean, they show up and ride on the</p> <p>24 airplane, you know.</p> <p>25 Q. And who are they, if you know?</p>	<p style="text-align: center;">136</p> <p>1 otherwise, the allegations that occurred or have been</p> <p>2 alleged to have occurred at his Palm Beach mansion,</p> <p>3 correct?</p> <p>4 A. Uh-huh.</p> <p>5 Q. Correct?</p> <p>6 A. Correct.</p> <p>7 Q. Given the nature of those allegations, would</p> <p>8 you leave your daughter of 17, 16, 15 years old with Mr.</p> <p>9 Epstein alone?</p> <p>10 MR. PIKE: Form. Move to strike.</p> <p>11 A. Yes.</p> <p>12 Q. You would?</p> <p>13 A. (Witness nods head.)</p> <p>14 Q. And why?</p> <p>15 A. Because I don't fear that he would try</p> <p>16 anything with my daughter. He showed -- When I</p> <p>17 worked for him he showed me respect. He never -- I</p> <p>18 never -- He never showed me disrespect. He would ask</p> <p>19 how the family is. I mean, not on a personal level,</p> <p>20 but an employer/employee.</p> <p>21 Q. Right. Okay.</p> <p>22 A. He never showed me any reason not to trust</p> <p>23 him.</p> <p>24 Q. But you're not a 13-year old girl, so.</p> <p>25 A. No, but, like I say, he never showed me</p>

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<p>1 any reason not to trust.</p> <p>2 Q. So maybe that's the reason why there were</p> <p>3 hundreds of victims, right?</p> <p>4 A. I don't know that there were.</p> <p>5 Q. So is it surprising to read the things that</p> <p>6 you read about what was going on at his house?</p> <p>7 A. Yes.</p> <p>8 MR. PIKE: Form. Move to strike.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. I'm going to ask you about -- I'm going to</p> <p>11 mark them all -- In fact, I'm going to show them to your</p> <p>12 attorney first because I'm going to mark them as a</p> <p>13 composite - just to save time.</p> <p>14 MR. REINHART: For the record, you've</p> <p>15 handed me a stack of passenger manifests?</p> <p>16 MR. EDWARDS: Yes. You can count them if</p> <p>17 you want, doesn't matter to me, and we'll just</p> <p>18 mark them as a composite - go through each one</p> <p>19 of them.</p> <p>20 MR. REINHART: If you're going to go</p> <p>21 through each one of them, I don't need to count</p> <p>22 them. You'll make a record on that.</p> <p>23 MR. EDWARDS: Fine. I'm going to mark</p> <p>24 these as Composite Exhibit 1, and we'll count</p> <p>25 them at the end.</p>	<p>1 know her if I saw her.</p> <p>2 Q. What did she do?</p> <p>3 A. I don't know. I don't know.</p> <p>4 Q. Would it surprise you if she was in charge of</p> <p>5 scheduling for the minors to come over to the house to</p> <p>6 sexually gratify Mr. Epstein?</p> <p>7 MR. PIKE: Form.</p> <p>8 A. Yeah, that would surprise me, yes.</p> <p>9 Q. Okay. She didn't do that while you were on</p> <p>10 the airplane, right?</p> <p>11 A. No, no.</p> <p>12 Q. Was Mr. Epstein on the airplane?</p> <p>13 MR. PIKE: Form. When?</p> <p>14 A. Yes.</p> <p>15 Q. And if it happened, it happened at a portion</p> <p>16 of the airplane where you couldn't see it because you</p> <p>17 were partitioned off?</p> <p>18 A. What happened?</p> <p>19 MR. REINHART: I'm sorry, can we just get</p> <p>20 a timeframe?</p> <p>21 MR. PIKE: Form.</p> <p>22 MR. REINHART: Are we talking about this</p> <p>23 flight?</p> <p>24 MR. EDWARDS: Yes, we're talking about</p> <p>25 that flight.</p>
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<p>1 (Defendant's Composite 1 was marked for</p> <p>2 identification.)</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. The first one's dated 1/14/2004. Can you tell</p> <p>5 me what we're looking at there? Just remember, I'm about</p> <p>6 as familiar with that type of stuff as a three year old,</p> <p>7 so help me out.</p> <p>8 A. Passenger manifest just showing basically</p> <p>9 date, time off, time on, the trip number of the year,</p> <p>10 I guess it would be - that seems high for the year -</p> <p>11 but trip number - that must be for the total -</p> <p>12 destination or departure point - destination.</p> <p>13 Q. The trip number says, "311." What does that</p> <p>14 mean?</p> <p>15 A. That must be -- I don't know where they</p> <p>16 start that. That must have been total since he</p> <p>17 started the airplane. That's way too many for the</p> <p>18 year. Obviously it's already - it's January, so it</p> <p>19 must have been total flights.</p> <p>20 Q. Who's on that airplane?</p> <p>21 A. Nautical miles, statute miles, fuel</p> <p>22 burned, poundage.</p> <p>23 [REDACTED]</p> <p>24 Q. Do you know [REDACTED]?</p> <p>25 A. I -- I think I know her. I think I would</p>	<p>1 BY MR. EDWARDS:</p> <p>2 Q. If anything happened on the airplane, it would</p> <p>3 have been in a position where you couldn't see it anyway.</p> <p>4 A. That's correct.</p> <p>5 Q. Okay.</p> <p>6 A. That's correct.</p> <p>7 Q. So you're not saying it did happen or it</p> <p>8 didn't happen, you just couldn't see past a certain</p> <p>9 point.</p> <p>10 A. Correct, and I don't know what you're</p> <p>11 referring to as "it" anyways.</p> <p>12 Q. "It" is whatever sexual involvement there was.</p> <p>13 A. Oh. Like you say, we can't see anything</p> <p>14 back there anyhow because the doors are closed.</p> <p>15 Q. Did Mr. Epstein instruct you as to whether or</p> <p>16 not to knock or just walk back there or never walk back</p> <p>17 there or what was the instruction?</p> <p>18 A. No. There was never actually a formal</p> <p>19 instruction. It's proper protocol for any of these</p> <p>20 gentlemen, or individuals that own these aircraft,</p> <p>21 that that's their private zone, that you don't come</p> <p>22 back unless you're needed, and then you can -- You</p> <p>23 know, but it's not forebode, it's just proper.</p> <p>24 Q. You mentioned President Clinton on the plane.</p> <p>25 How many girls were on the plane at the same time when</p>

<p style="text-align: center;">141</p> <p>1 President Clinton was on the plane?</p> <p>2 MR. REINHART: Asked and answered.</p> <p>3 A. Yeah, I don't remember for sure. There</p> <p>4 was probably maybe five, if that, and that's --</p> <p>5 Q. What were they --</p> <p>6 A. What?</p> <p>7 Q. Go ahead.</p> <p>8 A. Like I say, it was Ms. Maxwell, [REDACTED],</p> <p>9 maybe two others, one other, and then I think Mr.</p> <p>10 Clinton had two ladies in his entourage - support</p> <p>11 staff.</p> <p>12 Q. What age group are we talking about with the</p> <p>13 ladies that were on the airplane?</p> <p>14 MR. PIKE: Form.</p> <p>15 A. Mid-twenties to forties, maybe. I mean, I</p> <p>16 don't know exactly.</p> <p>17 Q. I mean, you know what a 13 or 14-year-old girl</p> <p>18 looks like --</p> <p>19 A. Yes.</p> <p>20 Q. -- right?</p> <p>21 A. Yes.</p> <p>22 Q. Most people do.</p> <p>23 A. Yes.</p> <p>24 Q. You wouldn't mistake a 13 or 14 or 15 year old</p> <p>25 for a 20 year old.</p>	<p style="text-align: center;">143</p> <p>1 you familiar with a flight where Prince Andrew was on the</p> <p>2 airplane?</p> <p>3 A. I don't know if I remember him being on</p> <p>4 the airplane or not. I know that he has been on the</p> <p>5 airplane or one of the airplanes. I can't say for</p> <p>6 sure.</p> <p>7 Q. Have you met him before?</p> <p>8 A. I can't remember, honestly. I know.</p> <p>9 Q. Can't remember meeting Prince Andrew?</p> <p>10 A. I know. I know. I didn't even know who</p> <p>11 he was when I first heard the name, sorry. But, no,</p> <p>12 I can't remember for sure, I'm sorry.</p> <p>13 Q. That's like if E.T. walked on the airplane and</p> <p>14 I don't know.</p> <p>15 A. I know. Well --</p> <p>16 Q. Alright. I'll let you slide on that one. You</p> <p>17 know who Prince Andrew is now.</p> <p>18 A. Okay. Don't paint me as stupid. One of</p> <p>19 Lady Di's sons, right?</p> <p>20 Q. I mean, you know what he looks like now.</p> <p>21 A. You know, honestly, I don't know if I</p> <p>22 could point him out to you, I'm sorry.</p> <p>23 Q. Alright.</p> <p>24 A. It's just --</p> <p>25 Q. We'll forget him.</p>
<p style="text-align: center;">142</p> <p>1 A. No, no.</p> <p>2 MR. PIKE: Form.</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. So you're sure that the people that were on</p> <p>5 the airplane - they were above the age of 18?</p> <p>6 A. I believe so.</p> <p>7 Q. Because you, in your experience, as well as</p> <p>8 the experience of most people your age, would know --</p> <p>9 A. Right.</p> <p>10 Q. -- what a 14 or 15 year old looks like.</p> <p>11 A. Right.</p> <p>12 Q. I'm going to go through the next flight log.</p> <p>13 You tell me what we're looking at here. Who's on the</p> <p>14 airplane?</p> <p>15 A. That was a deadhead. Nobody's on it.</p> <p>16 Q. Why were the names crossed out?</p> <p>17 A. Because there was no passengers. This was</p> <p>18 - origin was West Palm Beach - West Palm Beach. What</p> <p>19 date is this? 1/20/04? It was probably a test</p> <p>20 flight.</p> <p>21 Q. Okay.</p> <p>22 A. It was a training flight --</p> <p>23 Q. Okay.</p> <p>24 A. -- for Bill.</p> <p>25 Q. The next one -- Well, before I ask this: Were</p>	<p style="text-align: center;">144</p> <p>1 A. I'm smart in some things.</p> <p>2 Q. We'll forget him. We'll forget him. Don't</p> <p>3 worry about it.</p> <p>4 What's this? What are we looking at?</p> <p>5 MR. REINHART: For the record, you handed</p> <p>6 him a manifest dated January 17, 2005; is that</p> <p>7 correct?</p> <p>8 THE WITNESS: January -- Yes. Correct.</p> <p>9 Palm Beach to Kennedy, same thing, fuel</p> <p>10 burns, loads, destination, time off, time on.</p> <p>11 Next, it was trip 312. Jeffrey is on it, [REDACTED],</p> <p>12 David Mullen, [REDACTED], [REDACTED], Todd Myster (sic),</p> <p>13 and passenger, passenger.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. Do you know Todd Meister?</p> <p>16 A. He's a friend of his, I believe.</p> <p>17 Q. Father's Bob Meister? Do you know the names?</p> <p>18 A. No, I don't know that.</p> <p>19 Q. How do you know Todd Meister?</p> <p>20 A. I've just heard the name.</p> <p>21 Q. From who?</p> <p>22 A. Larry Visoski.</p> <p>23 Q. Larry Visoski knows these people?</p> <p>24 A. I think Todd Meister has an airplane, or</p> <p>25 something like that. He's talked to their flight</p>

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<p>1 crew.</p> <p>2 Q. For the most part, when you mention these</p> <p>3 people's names, you mention them as if they're just</p> <p>4 passengers on the airplane and this is their world -</p> <p>5 you're passing through, you don't know them.</p> <p>6 A. Right.</p> <p>7 Q. But Visoski - would you say that he has a</p> <p>8 closer relationship with Epstein to where he might know</p> <p>9 some of these people?</p> <p>10 MR. PIKE: Form.</p> <p>11 A. That could be an accurate - yeah. I mean,</p> <p>12 he's been with Jeffrey longer. I mean --</p> <p>13 Q. I mean, do you know that Visoski has a car</p> <p>14 that is registered in Jeffrey Epstein's name? You don't</p> <p>15 have anything like that, do you?</p> <p>16 A. No, I did not.</p> <p>17 Q. Were you aware of that?</p> <p>18 A. No.</p> <p>19 Q. Does Mr. Visoski tell you how far he goes back</p> <p>20 with Jeffrey Epstein?</p> <p>21 A. No, just, I mean, when he hired him,</p> <p>22 whenever that was after Glimcher - that's all I know.</p> <p>23 Q. Do you know anything about Visoski's private</p> <p>24 life?</p> <p>25 A. A little bit. He's married and -</p>	<p>1 Q. Well, do you know whose handwriting that is?</p> <p>2 A. No, no, I don't. It may be Larry's.</p> <p>3 Q. Similar handwriting --</p> <p>4 A. Wait a minute.</p> <p>5 Q. -- as those --</p> <p>6 A. Let's see the one with the training -</p> <p>7 because there's a different pilot on there.</p> <p>8 Q. Right. One where there is nobody on it,</p> <p>9 right?</p> <p>10 A. This is Bill's -- I can't -- This is</p> <p>11 Bill's writing. I think he was having him fill out</p> <p>12 the paperwork.</p> <p>13 Q. Bill Hammond?</p> <p>14 A. Yeah, this was his training flight.</p> <p>15 Q. The first one is Visoski?</p> <p>16 A. Maybe. I can't say for sure. I really</p> <p>17 can't say for sure.</p> <p>18 Q. And this is?</p> <p>19 A. I don't know if that's the same</p> <p>20 handwriting or not.</p> <p>21 Q. Well, is there any indication up here that</p> <p>22 would tell us whose handwriting it is? David Rodgers and</p> <p>23 Larry Visoski --</p> <p>24 A. No, because this is --</p> <p>25 Q. -- are the pilots.</p>
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<p>1 daughters. I mean --</p> <p>2 Q. Then I won't go into the rest of his private</p> <p>3 life.</p> <p>4 When it says, "1 pay, 1 pay," what does that</p> <p>5 mean?</p> <p>6 A. It's "PAX." P-A-X is short for</p> <p>7 "passenger." It's a brief.</p> <p>8 Q. Okay. Look, this is somebody that is listing</p> <p>9 names of people on an airplane. They're going out of</p> <p>10 their way --</p> <p>11 A. Right.</p> <p>12 Q. -- and then all of a sudden on No. 8 and 9</p> <p>13 they say, "one passenger." Is this person just getting</p> <p>14 lazy or is there a reason why there's no name?</p> <p>15 A. Like I say, just getting lazy and then</p> <p>16 didn't know who the passenger was.</p> <p>17 Q. Well, they obviously didn't know who Todd</p> <p>18 Meister was either - they wrote his name all wrong.</p> <p>19 A. They did?</p> <p>20 MR. PIKE: Form.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. Well, "Meister" is not spelled like that, so</p> <p>23 how did --</p> <p>24 A. I didn't -- I didn't know that. I don't</p> <p>25 know how he -- How does he spell it?</p>	<p>1 A. Yeah, but they don't indicate - they don't</p> <p>2 indicate who's captain that day. You know, I'm not a</p> <p>3 handwriting expert. I can't really -- Honestly, I</p> <p>4 can't tell you for sure whose handwriting it was.</p> <p>5 Q. Let's keep this one out, and tell me if this</p> <p>6 is -- I'm going to hand you January 19, 2005 --</p> <p>7 MR. REINHART: January 17.</p> <p>8 MR. EDWARDS: 2005?</p> <p>9 MR. REINHART: Yes.</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q. -- January 17, 2005, so two days later - where</p> <p>12 is this airplane going?</p> <p>13 A. From Kennedy to Palm Beach.</p> <p>14 Q. And so this is Palm Beach to Kennedy --</p> <p>15 A. Yep.</p> <p>16 Q. -- in this exhibit. The next one is Kennedy</p> <p>17 to Palm Beach.</p> <p>18 A. Correct.</p> <p>19 Q. They come back. Where do they stay - do you</p> <p>20 know?</p> <p>21 A. What do you mean?</p> <p>22 Q. Well, they get off on the 17th, they stay</p> <p>23 somewhere until they come back on the 19th. Do you know</p> <p>24 where they stay?</p> <p>25 MR. REINHART: Can we clarify who "they"</p>

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1 is?  
 2 BY MR. EDWARDS:  
 3 Q. I guess it is: David Mullen, [REDACTED]  
 4 [REDACTED], [REDACTED], Tod Myster (sic), 1 pax, another pax,  
 5 [REDACTED], and Jeffrey Epstein - and there's a crossed  
 6 out "Ghislain Maxwell," so I'm assuming she didn't go.  
 7 A. Correct.  
 8 I have no idea where they stayed. I  
 9 assume Jeffrey would stay in his home. [REDACTED] would  
 10 stay in her apartment. As for all the others, I have  
 11 no idea.  
 12 Q. Have you ever been to Jeffrey Epstein's home  
 13 in New York?  
 14 A. Just in the lower level of the entryway.  
 15 Q. Why did you go?  
 16 A. To pick up bags for the trip to go to the  
 17 airport and load them.  
 18 Q. Was there anybody else there with him?  
 19 A. I don't know with him. I never saw him  
 20 him. We saw the guy that ran the house.  
 21 Q. Who's that - Joe-Joe?  
 22 A. Joe-Joe would be there --  
 23 Q. What's Joe-Joe's name?  
 24 A. Joe-Joe, that's all I know, and then  
 25 there's the actual house manager. Joe-Joe is more of

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1 a driver, and then there's the house manager - I  
 2 forget his name.  
 3 But, yeah, we would meet -- There's an  
 4 office in the lower level that the bags would be at,  
 5 and we would put them in the back of the van, haul  
 6 them to the airport.  
 7 Q. Who's David Mullen?  
 8 A. I don't know. I heard of it. It sounds  
 9 familiar. I can't remember who he is.  
 10 Q. Somebody that lives in New York, Palm Beach?  
 11 A. I don't know. I don't know.  
 12 Q. I'm trying to keep them in order.  
 13 So coming back - you know, it looks like they  
 14 take to JFK: David Mullen, Tod Myster (sic), some  
 15 passengers unnamed - they come back with only [REDACTED]  
 16 [REDACTED], [REDACTED], and [REDACTED] - any idea why?  
 17 MR. PIKE: Form.  
 18 A. No, but, I mean, it's not unusual for  
 19 these guys to, you know, take somebody - let somebody  
 20 have a free ride to New York if they know them, they  
 21 are acquaintances, need a lift, I mean, that's not  
 22 unusual.  
 23 Q. How's that come about - do you know?  
 24 A. No, I don't - phone conversations,  
 25 cocktail parties. I don't know.

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1 Q. The next one is January 27, 2005, Palm Beach  
 2 to where?  
 3 A. St. Thomas.  
 4 Q. To St. Thomas.  
 5 A. Right.  
 6 Q. And he has [REDACTED] and [REDACTED] and Jeffrey.  
 7 A. Right.  
 8 Q. Does he tell you what happens in St. Thomas?  
 9 What he does there?  
 10 A. No, no.  
 11 Q. Ever heard that he imports underage girls from  
 12 Brazil to his --  
 13 MR. PIKE: Form.  
 14 Q. -- island in St. Thomas?  
 15 MR. PIKE: Form.  
 16 A. No, no, never heard that.  
 17 Q. What does he tell you about his island in St.  
 18 Thomas?  
 19 A. Not a lot. I mean, he would sometimes  
 20 talk about construction stuff or I would hear him -  
 21 overhear him and Larry talk about the helicopter pad  
 22 that they're putting in, little stuff like that - all  
 23 construction.  
 24 Q. Did he tell you two or three times a day, that  
 25 he sexually abuses girls between 12 and 15 years old?

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1 A. No.  
 2 MR. PIKE: Form.  
 3 BY MR. EDWARDS:  
 4 Q. Not something he ever mentions.  
 5 A. No, no.  
 6 MR. PIKE: Form.  
 7 BY MR. EDWARDS:  
 8 Q. The next - 2/3/05 - who's on the passenger  
 9 list?  
 10 A. Jeffrey, [REDACTED], [REDACTED], Jean Luc, David  
 11 Mullen, female, female, female.  
 12 Q. Any idea why they would list "female, female,  
 13 female," without listing the names?  
 14 A. No, just the same as -- The only idea I  
 15 would have would be the same reasoning for the -  
 16 previously when they listed them as just "PAX" - that  
 17 they didn't have any idea who they were, what their  
 18 name was.  
 19 Q. I mean, certainly that's --  
 20 A. I don't know whose handwriting that is.  
 21 Q. You're guessing, though, right?  
 22 A. Yeah. No, I'm guessing. I have no idea.  
 23 Q. Another guess would be they're 12 years old  
 24 and you can't put them on it.  
 25 MR. PIKE: Form.

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1 A. I wouldn't say that. I don't know that.  
 2 Q. Have you ever been on an airplane where you  
 3 looked at this and you thought, "Hey, that's kind of  
 4 strange that they wouldn't list them by name. They're  
 5 talking about it generically: Female, female, female?"  
 6 A. But they also --  
 7 MR. PIKE: Form.  
 8 A. -- on another one: PAX, PAX, PAX.  
 9 Q. You never thought that was odd either?  
 10 A. No. I never actually even really paid  
 11 attention to this paperwork. I don't see this.  
 12 MS. EZELL: Brad, excuse me - this is  
 13 Kathy Ezell - is there a date on that manifest  
 14 you're showing?  
 15 MR. EDWARDS: It's 2/3/05.  
 16 MS. EZELL: Thanks.  
 17 MR. EDWARDS: Is that your 12-year old  
 18 client listed as No. 6?  
 19 MR. PIKE: Form. Move to strike.  
 20 MS. EZELL: No, but --  
 21 MR. EDWARDS: Okay, sorry, somebody  
 22 else's.  
 23 MS. EZELL: Okay. Thanks.  
 24 BY MR. EDWARDS:  
 25 Q. 2/7/05 - who's on there?

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1 A. Jeffrey, [REDACTED], David Mullen,  
 2 Jansen, [REDACTED].  
 3 Q. Do you know who Jansen is?  
 4 A. No.  
 5 Q. David Mullen travels a lot. Do you have any  
 6 idea what his relationship is with Mr. Epstein?  
 7 A. I don't even know who David Mullen really  
 8 is.  
 9 Q. Have you ever seen him?  
 10 A. I might be able to place him if I saw a  
 11 picture of him.  
 12 Q. I mean, obviously you're on the airplane with  
 13 him a lot.  
 14 A. Yeah, so, I mean, obviously I would  
 15 recognize him if I saw a picture.  
 16 Q. Do you know if he travels with anybody else on  
 17 this?  
 18 A. Unless it's that one name I don't  
 19 recognize - that Jansen, or whatever.  
 20 Q. But Jansen's not somebody you know?  
 21 A. No, no.  
 22 Q. I can't read that date - maybe you can. I got  
 23 a bad fax copy.  
 24 A. Maybe 2 - 2/10.  
 25 Q. That's Michael Pike not wanting me to know

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1 what it says.  
 2 A. It's -- I think it's a 2 - 2/10.  
 3 Q. Alright. Can you tell us who's on that  
 4 airplane?  
 5 A. Jeffrey, looks like [REDACTED], [REDACTED] - is that  
 6 Jean Luc?  
 7 Q. Yeah.  
 8 A. That's Jean Luc, I think, and [REDACTED] -  
 9 [REDACTED] (sic).  
 10 Q. Jean Luc is another one who travels quite  
 11 frequently. Why, if you know, does he travel quite  
 12 frequently on these airplanes to and from New York with  
 13 Jeffrey Epstein - any idea?  
 14 A. My only assumption was business, and  
 15 that's just an assumption.  
 16 Q. What kind of business do you know of that they  
 17 have in common?  
 18 A. I was under the impression a modeling  
 19 business.  
 20 Q. Other than the modeling agency, what other  
 21 business do they engage in together, if you know?  
 22 A. I don't know.  
 23 Q. And has Jeffrey Epstein ever talked to you -  
 24 or loud enough to which you could hear him discussing the  
 25 modeling agency?

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1 MR. PIKE: Form.  
 2 A. No, just that the only conversation he  
 3 ever - I remember - was the one that he - the one  
 4 about the girl opening the wrong door on the motor  
 5 home.  
 6 Q. Was he happy or sad about the modeling agency?  
 7 A. No, he was happy she wasn't injured, but  
 8 he was kind of making light of what a silly thing to  
 9 do, you know.  
 10 Q. Do you know if Jean Luc is the one procuring  
 11 the models or is Jeffrey procuring the models?  
 12 A. I don't know.  
 13 MR. PIKE: Form.  
 14 BY MR. EDWARDS:  
 15 Q. You never investigated into how this modeling  
 16 agency is doing or anything else?  
 17 A. No, no interest.  
 18 Q. You try to stay completely out of it?  
 19 A. No interest.  
 20 Q. Especially in light of the recent things  
 21 you've read.  
 22 A. I mean, I didn't have any interest in it  
 23 before all the recent things.  
 24 Q. I'm going to skip this one because it talks  
 25 about very similar people that you've already read.

157	<p>1 A. Okay.</p> <p>2 Q. No different names.</p> <p>3 MR. REINHART: Can we just get the date on</p> <p>4 the record?</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. Well, actually, we don't have to skip it.</p> <p>7 2/15/05 - that's the date, right?</p> <p>8 A. Right.</p> <p>9 Q. And it says: Ghislaine Maxwell --</p> <p>10 A. Okay.</p> <p>11 Q. -- [REDACTED], [REDACTED], and [REDACTED]</p> <p>12 (sic); is that right?</p> <p>13 A. That's what it says.</p> <p>14 Q. Is that a typical crew that you would see on</p> <p>15 the plane?</p> <p>16 A. What year is this? In '05?</p> <p>17 Q. Yes.</p> <p>18 A. Yes, but towards the end there, I think</p> <p>19 the last year, I only saw Ms. Maxwell once.</p> <p>20 Q. Do you know of any falling out of sorts that</p> <p>21 Ghislaine Maxwell and Epstein had?</p> <p>22 A. Well, no. I think they still -- I think</p> <p>23 she still has a lot of association, or whatever.</p> <p>24 Q. Do you think they are still a couple?</p> <p>25 A. I don't know that they ever were. I never</p>	159	<p>1 Stanleys are.</p> <p>2 Q. Ever heard of them?</p> <p>3 A. No.</p> <p>4 Q. As far as you're concerned, they're some</p> <p>5 islanders or something, right? I mean --</p> <p>6 A. Well, they might be -- I mean --</p> <p>7 MR. PIKE: Form.</p> <p>8 A. -- there's a lot of wealthy people down</p> <p>9 there. They might have been friends or associates</p> <p>10 that needed a lift back stateside.</p> <p>11 Q. Fair enough.</p> <p>12 What's the next one?</p> <p>13 A. Teterboro to PBI.</p> <p>14 Q. And who's on it?</p> <p>15 A. Jeffrey, [REDACTED], and [REDACTED].</p> <p>16 MR. REINHART: Can we get a date for the</p> <p>17 record?</p> <p>18 THE WITNESS: 2/24.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. It seems like [REDACTED] and [REDACTED] travel a lot</p> <p>21 with Jeffrey. Is it ever your understanding that Jeffrey</p> <p>22 Epstein had a sexual relationship with either of them?</p> <p>23 A. That is not my understanding, no.</p> <p>24 Q. Do you know of [REDACTED] having a boyfriend</p> <p>25 ever?</p>
158	<p>1 did figure out the relationship, other than I assumed</p> <p>2 they were a couple and she was a business assistant -</p> <p>3 associate, but that was all assumption.</p> <p>4 Q. Did you ever know of Jeffrey Epstein to have a</p> <p>5 girlfriend, per se?</p> <p>6 A. If it would have been, it would have been</p> <p>7 Ms. Maxwell.</p> <p>8 Q. Other than Ms. Maxwell, could you identify any</p> <p>9 other female that appeared to be in a intimate</p> <p>10 relationship with Jeffrey Epstein?</p> <p>11 A. Not really, not that I - not that I could</p> <p>12 say it was a relationship, no.</p> <p>13 Q. I'm going to show you another one. I don't</p> <p>14 know these people. Tell me who they are. It looks like</p> <p>15 you're on the airplane --</p> <p>16 MR. REINHART: Can we get a --</p> <p>17 Q. -- and the date is 2/21/05.</p> <p>18 A. Right.</p> <p>19 Q. Which is ten days after the previous. It's</p> <p>20 going --</p> <p>21 A. I don't know who the Stanleys are.</p> <p>22 Q. And it's going from the island.</p> <p>23 A. To --</p> <p>24 Q. Palm Beach.</p> <p>25 A. -- Palm Beach. I don't know who the</p>	160	<p>1 A. I heard that she has a boyfriend.</p> <p>2 Q. And what's his name?</p> <p>3 A. And this is just hearsay. I don't know.</p> <p>4 Q. I'm interested in hearsay.</p> <p>5 A. I heard that she's dating somebody -</p> <p>6 that's all.</p> <p>7 Q. Dating whom?</p> <p>8 A. A guy -- Somebody by the name of Story.</p> <p>9 Q. Story Cowells (phonetic)?</p> <p>10 A. I don't know his last name.</p> <p>11 Q. How long has she been dating him?</p> <p>12 A. I don't know. This is just Larry, you</p> <p>13 know, every once in a while asks, you know, "What's</p> <p>14 going on?" "Who's" -- You know, I don't know.</p> <p>15 Q. Where does Story live?</p> <p>16 A. I think he's down here. I think he's one</p> <p>17 of Mr. Epstein's legal team or something or --</p> <p>18 Q. And Story is somebody who you heard of through</p> <p>19 Larry Visoski?</p> <p>20 A. Yes, yes.</p> <p>21 Q. And specifically what did Larry Visoski say</p> <p>22 about Story?</p> <p>23 A. He thought that they were dating - he and</p> <p>24 [REDACTED] - and this is all hearsay.</p> <p>25 Q. Since when?</p>

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- 1 A. This is all -- I don't remember. Some  
2 time within - maybe within the year. I don't know.  
3 I don't know.
- 4 Q. So it's your understanding then that if Story  
5 is in West Palm Beach or in the area, and he is dating  
6 somebody named ██████████, that it would also be a  
7 fair presumption that ██████████ would be somewhere  
8 nearby as well.
- 9 MR. PIKE: Form.
- 10 A. I mean, that's not necessarily so. I  
11 mean, in this day and age when you can get back and  
12 forth to New York via airlines, or anywhere; I mean,  
13 at times, yes, that would be a fair assumption, but  
14 not continuously.
- 15 Q. And what was the context in which the  
16 conversation came up where Larry Visoski says, "██████████  
17 ██████████" - who you have very little knowledge, I mean, I  
18 don't want to say "very little knowledge" - you obviously  
19 have seen her several times --
- 20 A. Yes.
- 21 Q. -- "██████████ is dating this person and his  
22 name is Story"? Obviously that's a strange name, so  
23 that's something you would probably remember.
- 24 A. Right, right.
- 25 Q. Otherwise, how would that come about?

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- 1 A. I don't remember how it came about,  
2 actually. I think I just - several months ago I  
3 asked what people were doing since, you know, there's  
4 been a lot of changes in staff since the boss was,  
5 you know, detained. There's been a lot of layoffs  
6 and stuff. The conversation was he was updating me  
7 as to who's still around, who's been laid off, you  
8 know, who's not with the company anymore, who's not  
9 with, you know, at certain houses.
- 10 Q. When you say "the boss" has been "detained,"  
11 the boss obviously is Jeffrey Epstein?
- 12 A. Correct. Yes.
- 13 Q. And you're having a conversation then with  
14 Larry Visoski about the changes that necessarily are  
15 made --
- 16 A. Right.
- 17 Q. -- because the boss is --
- 18 A. Well --
- 19 Q. -- either incarcerated or under house arrest,  
20 or whatever.
- 21 A. And the economy and everything, I mean.
- 22 Q. In the course of that he tells you something  
23 about, "Well, Story is dating ██████████,"
- 24 A. Yeah, or - I think he said something about  
25 one of Jeffrey - the paralegal or something, the

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- 1 attorney.
- 2 Q. And what else does he tell you? I mean, there  
3 are other changes other than, "Hey, Story's dating  
4 ██████████."
- 5 A. A couple of the - couple of long time  
6 people at the ranch were laid off.
- 7 Q. Such as who?
- 8 A. Oh, God - Mike and Deidra.
- 9 Q. Mike and Deidra?
- 10 A. Yeah.
- 11 Q. And those are people that run the Zorro  
12 Ranch --
- 13 A. They don't run it.
- 14 Q. -- in New Mexico?
- 15 A. They work there, yeah. And other changes  
16 to the island. You know, I can't remember all the  
17 names. I believe Adam, who was the chef, at the  
18 island left.
- 19 MR. PIKE: Hello?
- 20 BY MR. EDWARDS:
- 21 Q. Adam's the chef at the island?
- 22 A. Yes.
- 23 Q. And why did he leave?
- 24 A. I don't --
- 25 Q. Epstein's not around to cook for?

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- 1 A. Yeah. It may have been a layoff kind of  
2 thing - and the economy too. I mean, everybody's  
3 affected.
- 4 Q. What's your understanding about Mike and  
5 Deidra?
- 6 A. Just that they were laid off. I don't  
7 know the exact reasoning that they were laid off.
- 8 Q. And before we go back to this: Have you ever  
9 been to that Zorro Ranch --
- 10 A. Yes.
- 11 Q. -- in New Mexico?
- 12 A. Yes.
- 13 Q. How many times?
- 14 A. Several.
- 15 Q. Why?
- 16 A. Because when we take them out there it was  
17 too far to airline home, so we'd stay - stay at the  
18 ranch.
- 19 Q. And what was he there to do?
- 20 A. I have no idea.
- 21 Q. Well, you were at the ranch, right?
- 22 A. Yeah, but it's a big complex. There's --  
23 The main house is literally probably 3 or 4 miles  
24 from where we stay.
- 25 Q. Was ██████████ there also?

<p style="text-align: center;">165</p> <p>1 A. I'm sure at times, yes.</p> <p>2 Q. Well, I mean, usually he goes with his --</p> <p>3 A. The normal --</p> <p>4 Q. -- his [REDACTED], his Ghislaine.</p> <p>5 A. Yeah, his normal entourage, or whatever it</p> <p>6 is.</p> <p>7 Q. And was somebody there to schedule his people</p> <p>8 to come over and see him on a daily basis?</p> <p>9 A. I don't know. I don't know how that</p> <p>10 worked.</p> <p>11 Q. He's --</p> <p>12 A. Like I say, he's up at the main house.</p> <p>13 Once we were at the ranch there's really no contact.</p> <p>14 Q. Yeah, but I'm familiar with where this ranch</p> <p>15 is, and it's kind of in the middle of nowhere, right?</p> <p>16 A. Yeah.</p> <p>17 Q. And, you know, so when people come to or from</p> <p>18 the ranch, I mean, you can't help but almost be familiar</p> <p>19 that somebody's coming, right?</p> <p>20 A. Well --</p> <p>21 MR. PIKE: Form.</p> <p>22 A. -- I mean, you would see a car drive by or</p> <p>23 something or a truck. There's always a lot of</p> <p>24 activity, construction, and everything else going on.</p> <p>25 Where we stayed at Ranch Central, the</p>	<p style="text-align: center;">167</p> <p>1 Mexico ranch?</p> <p>2 A. Oh, no, no.</p> <p>3 Q. You don't remember that?</p> <p>4 A. No.</p> <p>5 Q. Could it have happened?</p> <p>6 A. It could have.</p> <p>7 Q. But you just don't remember seeing that.</p> <p>8 A. No, I don't ever remember seeing that.</p> <p>9 Q. Have you ever met Governor Bill Richardson?</p> <p>10 A. I saw him. He was --</p> <p>11 Q. How did you see him?</p> <p>12 A. He was at Ranch Central. He had been</p> <p>13 invited for dinner, or something, at the main house</p> <p>14 and they were coming down to get him.</p> <p>15 Q. He was invited to the Zorro Ranch. I call it</p> <p>16 that because that's apparently what Mr. Epstein's named</p> <p>17 it, right?</p> <p>18 A. Yes.</p> <p>19 Q. So Bill Richardson came to the Zorro Ranch for</p> <p>20 what?</p> <p>21 A. I -- It was a dinner meeting or something,</p> <p>22 I don't know.</p> <p>23 Q. Do --</p> <p>24 A. I think Mr. Richardson used to own the</p> <p>25 property the ranch was built on, or something. I</p>
<p style="text-align: center;">166</p> <p>1 small, little - basically like little hotel rooms</p> <p>2 where we stayed, you know, it was on a busy road</p> <p>3 because there was always like a lot of construction</p> <p>4 stuff and the ranch hands and everything up and down.</p> <p>5 Q. Did you see girls going to visit him there?</p> <p>6 A. Yes.</p> <p>7 Q. How often would girls go to visit him there?</p> <p>8 A. I don't know.</p> <p>9 Q. Did these --</p> <p>10 A. Not that often.</p> <p>11 Q. Did these seem like girls local to New Mexico</p> <p>12 or had they just flown in on an airplane, landed a</p> <p>13 helicopter on the property?</p> <p>14 A. Oh, I don't know. I never --</p> <p>15 MR. PIKE: Form.</p> <p>16 A. I never saw them up close. I mean --</p> <p>17 Q. Did they come in taxicabs?</p> <p>18 MR. PIKE: Form.</p> <p>19 A. I can't remember that - don't think so.</p> <p>20 Q. You don't ever think a girl came in a taxicab</p> <p>21 to the New Mexico ranch?</p> <p>22 A. I don't ever remember seeing a taxicab on</p> <p>23 the ranch.</p> <p>24 Q. Do you remember seeing girls two or three</p> <p>25 times a day going to visit him while he was at the New</p>	<p style="text-align: center;">168</p> <p>1 don't know.</p> <p>2 Q. Did you stay for the dinner?</p> <p>3 A. Oh, no, no. I was down at Ranch Central</p> <p>4 and he was just there while they were going to escort</p> <p>5 him up to the main house.</p> <p>6 Q. So Bill Richardson was where Epstein was where</p> <p>7 the dinner was.</p> <p>8 A. Yes, yes.</p> <p>9 Q. And you were not there.</p> <p>10 A. Of course not.</p> <p>11 Q. Who else besides Bill Richardson was there?</p> <p>12 A. I have no idea.</p> <p>13 Q. Any knowledge of Bill Richardson being</p> <p>14 involved with any of the girls that would have been</p> <p>15 brought to the house?</p> <p>16 A. Oh, no, no, not that I have.</p> <p>17 Q. Not that I know of.</p> <p>18 A. Not that I know, no.</p> <p>19 Q. Because you were in such a place that you</p> <p>20 never would have known anyway, right?</p> <p>21 A. That's correct, yeah.</p> <p>22 Q. What's your understanding as to Bill</p> <p>23 Richardson's connection to Mr. Epstein?</p> <p>24 A. I thought he was always just kind of</p> <p>25 politics. I believe - I heard at one time, I don't</p>

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1 know for a fact - I thought that part of the property  
 2 the Zorro was built on was owned by Bill Richardson.  
 3 He sold it to Jeffrey.  
 4 Q. Ever known Bill Richardson to be on Epstein's  
 5 airplane?  
 6 A. No, not the Boeing.  
 7 Q. Any plane.  
 8 A. I don't know that.  
 9 Q. Was he ever on a plane that you were on?  
 10 A. No, not that I remember, not that I  
 11 remember. I remember -- I believe the only time I  
 12 met him was one time at Ranch Central.  
 13 Q. Ever hear of a trust - Zorro Trust?  
 14 A. No.  
 15 Q. Are you familiar with some of Epstein's  
 16 companies?  
 17 MR. PIKE: Form.  
 18 A. No. I mean, other than JEJE and Hyperion  
 19 and Air Ghislaine.  
 20 Q. What's Air Ghislaine?  
 21 A. That's the helicopters - that's what  
 22 they're under.  
 23 Q. He named it after Ghislaine Maxwell?  
 24 A. Apparently so. I would assume so.  
 25 Q. Well, I mean, I'm not trying to be difficult

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1 with you.  
 2 A. No, I wouldn't --  
 3 Q. I'm assuming you're not trying with me either.  
 4 A. No. I would assume so. I mean, that's an  
 5 unusual name.  
 6 Q. Do you know Prince Andrew to be friends with  
 7 Jeffrey Epstein?  
 8 MR. PIKE: Form.  
 9 A. No, I don't know that -- I don't know what  
 10 the tie is. Like I say, I didn't know even know who  
 11 Prince Andrew is when I first heard of it. I would  
 12 have thought it would have been more of a tie with  
 13 Ms. Maxwell.  
 14 Q. Right. Do you know of Ms. Maxwell bringing  
 15 the two, that being Prince Andrew, together with Mr.  
 16 Epstein?  
 17 MR. PIKE: Form.  
 18 A. That could be, yes, yep.  
 19 Q. And at the time when Bill Richardson had this  
 20 meeting at Epstein's house, do you remember Ghislaine  
 21 Maxwell also being there?  
 22 A. Can't say for sure. Can't say for sure.  
 23 Q. Have you heard of Jeffrey Epstein winning the  
 24 lottery in New Mexico?  
 25 A. No.

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1 Q. You've never heard that?  
 2 A. No, no.  
 3 Q. Have you ever been privy to any conversations  
 4 between Bill Richardson and Jeff Epstein?  
 5 A. No.  
 6 Q. So you don't know what they were really  
 7 talking about.  
 8 A. No. No idea.  
 9 Q. At the time when Bill Richardson was running  
 10 for president - is that around the time when you remember  
 11 him being at Zorro Ranch?  
 12 A. Before, before. What year did he run for  
 13 president?  
 14 Q. 2007.  
 15 A. It had to have been well before because I  
 16 quit flying in February of '07, so.  
 17 Q. Epstein ever tell you what his relationship is  
 18 with Bill Richardson?  
 19 A. No.  
 20 Q. When you were at the ranch, did you ever  
 21 notice underage girls at the ranch?  
 22 A. No.  
 23 MR. PIKE: Form.  
 24 BY MR. EDWARDS:  
 25 Q. Anybody ever told you that that ranch is used

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1 to transport girls through Mexico to the ranch?  
 2 A. No.  
 3 MR. PIKE: Form.  
 4 BY MR. EDWARDS:  
 5 Q. The next exhibit that I'm going to show you -  
 6 which is all part of Composite Exhibit 1 - is a flight  
 7 log 2/24/05; is that right?  
 8 A. Yes.  
 9 Q. Who's on that? Nobody. That's a test flight?  
 10 A. That's a test flight round robin. It's  
 11 only 17 minutes.  
 12 Q. 3/1/05.  
 13 A. 3/1/05 is FBI to Kennedy with Jeffrey,  
 14 [REDACTED] and [REDACTED].  
 15 Q. Do you know what his relationship is with  
 16 [REDACTED]?  
 17 A. No.  
 18 Q. Do you know what she does for him?  
 19 A. No, only -- Isn't that the one that you  
 20 told me - you just mentioned earlier? I have no idea  
 21 what her relationship is.  
 22 Q. Has he ever told you what any of his employees  
 23 actually do for him - why he employs so many people to do  
 24 so many different things - has he told you that?  
 25 MR. PIKE: Form.

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1 A. No, no. I mean, you know, who runs each  
 2 house and who the driver is, stuff like that. No, he  
 3 would never mention that.  
 4 Q. Has he ever told you what running a house  
 5 entails?  
 6 A. No, no.  
 7 Q. Has he ever told you that there's an extra  
 8 part of running the house that ensures that underage  
 9 girls are going to be there for him every day?  
 10 A. No.  
 11 MR. PIKE: Form.  
 12 BY MR. EDWARDS:  
 13 Q. That's not something you ever heard.  
 14 A. No.  
 15 Q. 3/4/2005 flight log - who's on it?  
 16 A. Jeffrey, Ghislaine Maxwell, David Mullen,  
 17 [REDACTED], [REDACTED].  
 18 Q. David Mullen - once again, we don't know who  
 19 this guy is, do you?  
 20 A. And I don't know. Honestly, I can't --  
 21 Q. Do you know where he lives?  
 22 A. No.  
 23 Q. Did you ever go visit Jeffrey Epstein while he  
 24 was in jail?  
 25 A. No.

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1 Q. Why not?  
 2 A. There was no purpose to it. There was no  
 3 need to.  
 4 Q. He's your boss for a long time, right?  
 5 A. Yeah.  
 6 Q. Was he good to you?  
 7 A. Yes.  
 8 Q. Did you support him?  
 9 A. Yes.  
 10 Q. You supported him while he was in jail?  
 11 A. I was -- Yes, I mean.  
 12 Q. Did the allegations bother you?  
 13 A. Yes.  
 14 MR. PIKE: Form.  
 15 BY MR. EDWARDS:  
 16 Q. Somebody that you still support despite the  
 17 allegations?  
 18 MR. PIKE: Form.  
 19 A. Yes, yes.  
 20 Q. You realize that he did plead guilty to the  
 21 offenses as well, right?  
 22 A. That's what I read.  
 23 MR. PIKE: Form. Move to strike. That's  
 24 not the facts.  
 25 BY MR. EDWARDS:

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1 Q. And despite pleading guilty to procuring  
 2 underage girls for the purposes of sex, you still feel  
 3 comfortable leaving a 13, 14, 15-year-old girl around  
 4 him?  
 5 MR. PIKE: Form. Move to strike.  
 6 A. Yes. I mean, with my daughter, yes. I  
 7 don't know how he behaves around anybody else. I  
 8 just know that the respect that he showed me, I feel  
 9 safe with my daughter.  
 10 Q. And have you read in detail the reports as to  
 11 what happened at his house with the girls?  
 12 A. Only --  
 13 MR. PIKE: Form.  
 14 A. -- what's been in the newspapers and  
 15 published.  
 16 Q. If you read and hear testimony given - well, I  
 17 can tell you now - testimony has been given in this case  
 18 that what happens is: A 13 or 14 year old is led  
 19 upstairs by herself, told to get naked, he lays down on  
 20 his back, there is a brief massage before he turns over,  
 21 exposes himself erect, masturbates while he tells this 13  
 22 or 14 year old to pinch his nipples as hard as she can  
 23 while he inserts his fingers into their vagina and  
 24 ejaculates all over them before saying, "Take your money  
 25 and leave."

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1 MR. PIKE: Form. Move to strike.  
 2 BY MR. EDWARDS:  
 3 Q. Okay? Then, "You can continue to come back  
 4 for \$200 every time or every girl you bring me within  
 5 your age group and I get to do this again, I pay you \$200  
 6 per person." If that is the testimony --  
 7 MR. PIKE: Form.  
 8 Q. -- that what happens behind closed doors with  
 9 him, do you still feel comfortable leaving a 13 or 14  
 10 year old in a room with Jeffrey Epstein?  
 11 MR. PIKE: Form.  
 12 A. If that, in fact, is what actually  
 13 happened, no.  
 14 Q. I'll show you the next flight log is 3/8/05.  
 15 Here, just so these are in order, I'll - 3/8/05.  
 16 A. Okay.  
 17 Q. Who's on that airplane?  
 18 A. [REDACTED] - Jeffrey, [REDACTED], [REDACTED], and [REDACTED].  
 19 Q. Seem to be people that he travels with  
 20 frequently.  
 21 A. Yes, normal - his normal entourage.  
 22 Q. Have you read recently the agreement that was  
 23 entitled the "Non-Prosecution Agreement"?  
 24 A. No. All I read was what was in the paper.  
 25 Q. The "Non-Prosecution Agreement" was an

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1 agreement between Epstein and the government where the  
 2 government agreed, "We're not going to prosecute you for  
 3 only the sex crimes we know about," and in that they also  
 4 agree not to prosecute Jeffrey Epstein, [REDACTED],  
 5 [REDACTED], or [REDACTED] --  
 6 A. Okay.  
 7 Q. -- as his co-conspirators.  
 8 Do you know any of the acts that [REDACTED], [REDACTED],  
 9 or [REDACTED] have done in an attempt to get Jeffrey Epstein  
 10 young girls to molest?  
 11 A. Only what I've read in the paper.  
 12 MR. PIKE: Move to strike.  
 13 BY MR. EDWARDS:  
 14 Q. Again, Jeffrey Epstein, Ghislaine Maxwell, and  
 15 who's that?  
 16 MR. REINHART: Can we get a date, please?  
 17 BY MR. EDWARDS:  
 18 Q. Sorry, the date is 3/18/05. On this flight  
 19 log, who are the names?  
 20 A. Ghislaine - Jeffrey, Ghislaine Maxwell,  
 21 and [REDACTED].  
 22 Q. Do you know Ghislaine Maxwell on a social  
 23 level or only from him?  
 24 A. No, just professional.  
 25 Q. Do you know whether she is straight or

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1 bisexual? Do you know of any of her girlfriends?  
 2 A. I do not know that.  
 3 Q. Are you aware that Ghislaine Maxwell, in sworn  
 4 testimony and in complaints, has been alleged to have  
 5 used vibrators, dildos, and have sex with these underage  
 6 girls as well?  
 7 A. I don't --  
 8 MR. PIKE: Form.  
 9 A. I was not aware of that.  
 10 Q. Do you know who [REDACTED] is?  
 11 A. I think [REDACTED] used to be her assistant at  
 12 her home.  
 13 Q. Used to be Ghislaine Maxwell's assistant?  
 14 A. I believe so, yeah, because "[REDACTED]" an  
 15 unusual name.  
 16 Q. Do you know if [REDACTED] is underage or if she is  
 17 of age at the time that this happened - at the time they  
 18 list her name?  
 19 A. Oh, I don't know for sure, but, I mean,  
 20 she - when I -- If it is the [REDACTED] I remember,  
 21 she was older. I mean, I can't even guess her age,  
 22 mid-twenties, late twenties, I mean.  
 23 Q. Okay. Do you --  
 24 A. If it's the [REDACTED] I remember, it was her  
 25 assistant at the house.

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1 Q. This is the first time we've seen [REDACTED]  
 2 mentioned on any flight logs, right?  
 3 A. Right.  
 4 Q. Do you find it at all peculiar that [REDACTED]  
 5 is listed but certain other people who may or may not be  
 6 of age are listed generically - one female. Why would  
 7 they go out of their way to list [REDACTED]?  
 8 MR. PIKE: Form.  
 9 A. I don't know. Maybe she was already an  
 10 employee or something. I don't know.  
 11 Q. If she's an employee at the time, then that  
 12 would be a good explanation, right?  
 13 A. Right. I don't know.  
 14 Q. If she's not an employee, then is there any  
 15 explanation?  
 16 MR. PIKE: Form.  
 17 A. Unless -- No. I don't know. I don't  
 18 know. Maybe Bill asked her. That looks like Bill's  
 19 writing there when he was captain.  
 20 Q. We'll move to 3/22/05.  
 21 A. Okay.  
 22 Q. Who's listed?  
 23 A. Actually, this wasn't even my flight.  
 24 This is: Jeffrey, [REDACTED], female, [REDACTED], female  
 25 - FBI to Kennedy.

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1 Q. That's not your flight?  
 2 A. No. George Diaz is one of the few  
 3 engineers I used as a relief. See his name written  
 4 in up there?  
 5 Q. Yes, but it has your name written under it,  
 6 right?  
 7 A. Well, yeah, because these are pre-printed  
 8 forms. They neglected to scratch my name out.  
 9 Q. Any idea why now they're going to list "one  
 10 female, one female"? That doesn't seem to be protocol  
 11 here, does it?  
 12 A. I don't -- Yeah. I have no idea. I don't  
 13 have an answer for that, I really don't.  
 14 Q. Certainly, if you're able to get [REDACTED] to  
 15 tell you her name, it doesn't take much effort to get two  
 16 other people to tell you their name, right?  
 17 A. Like I say, the only thing I can think of  
 18 is if [REDACTED] an employee by that time, that they knew  
 19 her. I don't know.  
 20 Q. Did it ever at any point in time cross your  
 21 mind that there may be something illegal going on here --  
 22 ever?  
 23 MS. EZELL: Form.  
 24 MR. PIKE: Form.  
 25 A. Define "here."

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1 Q. Here when you're traveling on the airplane  
2 with these various girls and they're listed as "one  
3 female" - generically listed - anything ever cross your  
4 mind, "maybe something's not exactly kosher"?  
5 A. No.  
6 MR. PIKE: Form, asked and answered  
7 several times.  
8 BY MR. EDWARDS:  
9 Q. Who's that? The date is 3/31/05.  
10 A. Jeffrey, Ghislaine, and [REDACTED].  
11 Q. Let's see, 10/15 and 10/17, both look like  
12 nobody's on them, so I'll show them to you together.  
13 A. There might be remarks here: "Maintenance  
14 test flight" out of Lake City, Florida.  
15 We were coming out of maintenance: "No  
16 passengers, maintenance, relocation for the engineer  
17 repair."  
18 Q. Okay. 4/6/05 - who's on it?  
19 A. Jeffrey, [REDACTED], David Mullen, [REDACTED].  
20 [REDACTED].  
21 Q. Last one.  
22 A. Jeffrey - 6/8/05 - [REDACTED], David  
23 Mullen, [REDACTED], [REDACTED], Mark Zeff --  
24 Q. Do you know who Mark Zeff is?  
25 A. No -- Daniell, Doug Shuttle, [REDACTED].

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1 Q. Do you know who Daniell and [REDACTED] are?  
2 A. I think [REDACTED] I remember - sounds familiar.  
3 Q. How did she look?  
4 A. I can't remember. I just --  
5 Q. Overage, underage?  
6 MR. PIKE: Form.  
7 A. I never saw any that I saw that looked to  
8 me underage.  
9 Q. Have you ever been to Jeffrey Epstein's house  
10 - his Palm Beach house?  
11 A. Yes.  
12 Q. You stayed for an entire day?  
13 A. No, no.  
14 Q. No?  
15 A. It would be like an hour at the most  
16 waiting to talk to him for a minute. No.  
17 Q. Let me ask it this way: Has he ever told you  
18 that he's infatuated with massages?  
19 A. No, he's never told me that.  
20 MR. PIKE: Form.  
21 BY MR. EDWARDS:  
22 Q. Have you ever known him to get a professional  
23 massage anywhere you go?  
24 A. Yeah, I believe so.  
25 Q. Where?

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1 A. I can't -- I can't say for sure. I mean,  
2 we used to carry a massage table on the airplane. I  
3 never saw one used. I don't know for sure.  
4 Q. Are you being paid to be here today?  
5 A. No, no. I mean, I'm on salary. I mean --  
6 Q. Right.  
7 A. -- because of - for the maintenance, but,  
8 no.  
9 Q. Are you going to ask Jeffrey Epstein at some  
10 point in time, "Why you hired an attorney to sit here  
11 with me?"  
12 A. No.  
13 MR. PIKE: Form.  
14 A. I would never -- I would not approach  
15 Jeffrey for that.  
16 Q. Do you have any idea why Jeffrey Epstein might  
17 want an attorney to sit here for you?  
18 MR. PIKE: Form.  
19 A. No. I mean, maybe -- I don't know.  
20 Q. Do you think that the attorney sitting here is  
21 for the purpose so that you don't say anything to  
22 incriminate Jeffrey Epstein?  
23 A. No, no. I was told strictly that he was  
24 here upon my behalf.  
25 Q. Do you know of any crimes, personally, that

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1 you witnessed Jeffrey Epstein committing?  
2 A. No.  
3 Q. Would you --  
4 A. No.  
5 Q. -- go back - considering what you've read and  
6 what you may or may not believe - would you go back to  
7 working for Jeffrey Epstein?  
8 MR. PIKE: Form.  
9 A. I can't say. I still work for him on a  
10 maintenance - to maintain the airplanes and stuff  
11 like that, so.  
12 Q. You're on his payroll?  
13 A. Salaried, yes.  
14 Q. Do you know who else is on his payroll?  
15 A. Well, Dave and Larry.  
16 Q. Certainly, if I want to know more about his  
17 private life - do you know who's at his house?  
18 A. No.  
19 Q. Do you know who his housekeeper is?  
20 A. No.  
21 Q. Do you know who his architect is?  
22 A. No, no.  
23 Q. Does Larry visit him at his house?  
24 A. I would assume so.  
25 Q. Why do you say you would assume so? That

<p style="text-align: center;">185</p> <p>1 means he told you something, right?</p> <p>2 A. Well, he handles -- Jeffrey does a lot of</p> <p>3 - he likes high-end stereo equipment and video</p> <p>4 equipment, and Larry is an expert at audio and video</p> <p>5 installations and stuff.</p> <p>6 Q. How about David Rodgers - ever at his house?</p> <p>7 A. Probably, but more like on the grounds of</p> <p>8 me, you know.</p> <p>9 Q. Any other famous people that you met through</p> <p>10 Jeff Epstein?</p> <p>11 A. On the airplane?</p> <p>12 Q. Yes.</p> <p>13 A. Walter Cronkite.</p> <p>14 Q. Oh, yeah?</p> <p>15 A. He was very nice. Yeah. He was very</p> <p>16 feeble, but he was very nice. We had to carry him</p> <p>17 down the steps.</p> <p>18 Q. Where did that flight go to?</p> <p>19 A. New York to St. Thomas. He's an avid</p> <p>20 sailor. He loves to sail or loved to sail.</p> <p>21 Q. What's the magician's name - David</p> <p>22 Copperfield?</p> <p>23 A. No, I don't think I was on that. I don't</p> <p>24 think I flew that. I heard that we had flown him. I</p> <p>25 can't say for sure. I would remember that. I would</p>	<p style="text-align: center;">187</p> <p>1 A. Yes, I guess. Yeah. I don't know</p> <p>2 exactly.</p> <p>3 Q. Have you ever heard of [REDACTED]?</p> <p>4 A. [REDACTED] sounds familiar, but I don't</p> <p>5 know --</p> <p>6 Q. Model? New York?</p> <p>7 A. No, I can't say that I have.</p> <p>8 Q. [REDACTED]?</p> <p>9 A. Can't say that I have.</p> <p>10 Q. Glenn Dubin?</p> <p>11 A. Glenn Dubin, yes.</p> <p>12 Q. How do you know him?</p> <p>13 A. I think he's a money or finance manager of</p> <p>14 some form - associate of Jeffrey or Ghislaine's or</p> <p>15 both.</p> <p>16 Q. And where does he live?</p> <p>17 A. I think he lives in California, I believe.</p> <p>18 Q. What do you know about him?</p> <p>19 A. Well, he's - just all I just told you. I</p> <p>20 think he's - he's an options writer or something like</p> <p>21 - not an options writer, hedge funds or something</p> <p>22 like that. He's in money. It's -- He's got an</p> <p>23 airplane. I think he's got a quarter share or part</p> <p>24 of an airplane.</p> <p>25 Q. Do you know anybody that owns any property</p>
<p style="text-align: center;">186</p> <p>1 remember it. I have never met David Copperfield, but</p> <p>2 I heard that we had. Naomi Campbell - flew her a</p> <p>3 couple times.</p> <p>4 Q. What do you understand Naomi Campbell and</p> <p>5 Jeffrey Epstein's relationship to be?</p> <p>6 A. I don't. I assume it was modeling. I</p> <p>7 don't know. It was like two trips.</p> <p>8 Q. Jeffrey Epstein ever tell you how long he was</p> <p>9 in the modeling industry?</p> <p>10 A. Never discussed it.</p> <p>11 Q. So the first you know of is whatever</p> <p>12 involvement he's in with Jean Luc Brunel.</p> <p>13 A. Right.</p> <p>14 Q. That's the first time --</p> <p>15 A. Yes.</p> <p>16 Q. -- you've never known him to be in modeling.</p> <p>17 A. Correct, that I was aware of. And,</p> <p>18 actually, nobody ever told me that but picking up</p> <p>19 bits of conversation like such as the one about the</p> <p>20 motor home door.</p> <p>21 Q. What exactly did he say about the motor home</p> <p>22 door that led you to know that Epstein and modeling is --</p> <p>23 A. They were at - on location for a modeling</p> <p>24 shoot and they had a motor home.</p> <p>25 Q. "They" meaning Jeffrey Epstein and somebody.</p>	<p style="text-align: center;">188</p> <p>1 with Epstein?</p> <p>2 A. No.</p> <p>3 Q. What other properties does Jeffrey Epstein</p> <p>4 own? I know we talked about the Zorro Ranch, the place</p> <p>5 in New York, you talked about an island, West Palm Beach.</p> <p>6 A. That's all that I'm aware of.</p> <p>7 Q. How about Paris?</p> <p>8 A. I don't know that he owns them. That's</p> <p>9 where he goes for homes.</p> <p>10 Q. Ever go to Paris with him?</p> <p>11 A. He does have an apartment in Paris. I</p> <p>12 don't know - however that works out, if it's a lease</p> <p>13 or own or what.</p> <p>14 Q. Who are the house managers of the various</p> <p>15 places that he owns?</p> <p>16 MR. PIKE: Form.</p> <p>17 A. I don't know anymore. There has been so</p> <p>18 much shake up, you know.</p> <p>19 Q. Well, who were they? Do you know the</p> <p>20 Freidmans out in California? Do you know Eve and</p> <p>21 Patrick?</p> <p>22 A. No.</p> <p>23 Q. Alfredo Rodriguez?</p> <p>24 A. No.</p> <p>25 Q. Alright.</p>

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<p>1 A. No, those are all I know.</p> <p>2 Q. You tell me. Who do you know?</p> <p>3 A. God, I can't think. It's been so long</p> <p>4 ago.</p> <p>5 Q. Other than Joe-Joe.</p> <p>6 A. Well, Joe-Joe doesn't - he's just a driver</p> <p>7 for New York - he and his wife. I could remember</p> <p>8 them if I saw their names. I would know which house</p> <p>9 they were associated with. I'm terrible with names</p> <p>10 anymore, unfortunately. The couple that's now at the</p> <p>11 ranch or was at the ranch is at the island helping</p> <p>12 manage as an intern.</p> <p>13 Q. Who's that?</p> <p>14 A. Honestly, I can't remember their names.</p> <p>15 If you were to give me a name, I could attach it to</p> <p>16 each house.</p> <p>17 Q. I wish I could.</p> <p>18 A. Yeah, I'm sorry, I can't. It's just --</p> <p>19 Q. Do you know [REDACTED]?</p> <p>20 A. No. [REDACTED] sounds familiar. I don't</p> <p>21 know.</p> <p>22 Q. Something to do with the modeling agency?</p> <p>23 A. Can't say for sure - can't say.</p> <p>24 Q. How about Kalib Shalom?</p> <p>25 A. No, never heard of that one.</p>	<p>1 Q. Do you remember a young woman named [REDACTED] who</p> <p>2 flew frequently with Jeffrey Epstein?</p> <p>3 A. No, I don't recall a V.</p> <p>4 Q. You mentioned a [REDACTED]?</p> <p>5 A. A [REDACTED], yes. I remember the name [REDACTED].</p> <p>6 Q. Can you describe [REDACTED]?</p> <p>7 A. No, I'm sorry, I can't. I just recognize</p> <p>8 the name - or the sound of the name.</p> <p>9 Q. Do you have any recollection as to what period</p> <p>10 of time [REDACTED] flew with Mr. Epstein?</p> <p>11 A. It was on one of those Passenger</p> <p>12 Manifests. I thought I only saw it one time.</p> <p>13 MR. REINHART: Kathy - this is Bruce - the</p> <p>14 passenger manifest that had that name on it was</p> <p>15 dated June 8, 2005.</p> <p>16 MS. EZELL: So all of those that Brad went</p> <p>17 over were '04 and '05, I believe.</p> <p>18 MR. REINHART: Correct.</p> <p>19 BY MS. EZELL:</p> <p>20 Q. Let's see, did you ever fly Mr. Epstein to St.</p> <p>21 Louis?</p> <p>22 A. No.</p> <p>23 Q. Did you ever fly him to San Francisco?</p> <p>24 A. No.</p> <p>25 Q. What about France?</p>
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<p>1 MR. EDWARDS: Let me look over my notes</p> <p>2 real fast. Anybody else going to have some</p> <p>3 questions so I can look over my notes and maybe</p> <p>4 ask a couple more?</p> <p>5 MR. PIKE: Brad, when I get a chance to</p> <p>6 cross, I definitely will have some questions for</p> <p>7 the witness.</p> <p>8 MR. EDWARDS: Okay. Any other plaintiff</p> <p>9 attorneys? Kathy? I think Kathy quit on us -</p> <p>10 must have been too boring. Anybody else?</p> <p>11 Hold on Mike. Give me one minute and then</p> <p>12 I think you can shoot.</p> <p>13 MS. EZELL: Brad?</p> <p>14 MR. EDWARDS: Yes?</p> <p>15 MS. EZELL: I'm sorry, it's Kathy. I</p> <p>16 didn't realize my mute was on. I do have a few</p> <p>17 questions.</p> <p>18 MR. EDWARDS: Okay. Go ahead.</p> <p>19 CROSS-EXAMINATION</p> <p>20 BY MS. EZELL:</p> <p>21 Q. Mr. Morrison - forgive me, I didn't write it</p> <p>22 down - when did you begin working for Mr. Epstein?</p> <p>23 A. January 2001.</p> <p>24 Q. Do you remember a young woman named [REDACTED]?</p> <p>25 A. No, I'm sorry, I can't - I don't.</p>	<p>1 A. Yes, Paris.</p> <p>2 Q. And Spain?</p> <p>3 A. No, nope.</p> <p>4 Q. Carmel?</p> <p>5 A. Carmel?</p> <p>6 MR. REINHART: California, Kathy?</p> <p>7 MS. EZELL: Yes.</p> <p>8 A. No, we wouldn't have -- Was that Monterey</p> <p>9 area?</p> <p>10 MR. REINHART: Yes.</p> <p>11 A. Yes.</p> <p>12 Q. Monterey you did, okay.</p> <p>13 Do you remember a woman named [REDACTED] - who would</p> <p>14 accompany Elaine (sic) Maxwell?</p> <p>15 A. Yes, I remember [REDACTED]. I believe she was</p> <p>16 British or --</p> <p>17 Q. And what was her function?</p> <p>18 A. To the best of my knowledge, she was Ms.</p> <p>19 Maxwell's assistant.</p> <p>20 Q. Did there come a point in time where Ms.</p> <p>21 Maxwell flew her own plane?</p> <p>22 A. No.</p> <p>23 Q. Did there come a time that you became aware</p> <p>24 that she and Jeffrey Epstein were flying separately?</p> <p>25 A. Yes.</p>

<p>193</p> <p>1 Q. And whose plane would she fly on on those</p> <p>2 occasions?</p> <p>3 A. I don't know. There was -- She had a</p> <p>4 fractional - of a flight options. She had some</p> <p>5 flight options. When you said -- Can I ask --</p> <p>6 Q. Yes.</p> <p>7 A. -- when you stated, "Did she fly her own</p> <p>8 plane?", did you mean as a pilot?</p> <p>9 Q. Yes, yes.</p> <p>10 A. No, no. I stand with, no.</p> <p>11 Q. Did you ever know her to fly a helicopter?</p> <p>12 A. Yes.</p> <p>13 Q. And when was that?</p> <p>14 A. Several times. I don't remember exactly</p> <p>15 when she got her initial rating. Can't remember</p> <p>16 exactly when she got her initial rating. It was</p> <p>17 before - I think before - maybe around 2000, 2001. I</p> <p>18 don't know that for a fact.</p> <p>19 Q. Among the various pilots that you have worked</p> <p>20 with for Jeffrey Epstein, do you know of any who has a</p> <p>21 house on the Zorro Ranch property?</p> <p>22 A. Yes.</p> <p>23 Q. And who is that?</p> <p>24 A. Larry Visoski.</p> <p>25 Q. And do you know if he was given that house by</p>	<p>195</p> <p>1 A. I can't say that I have, no. I can't say</p> <p>2 that I did.</p> <p>3 Q. Do you remember flying three young girls back</p> <p>4 to France after Mr. Epstein's birthday party?</p> <p>5 A. No, no, I can't say that I do, and I</p> <p>6 didn't remember what birthday - that there was a big</p> <p>7 birthday party.</p> <p>8 Q. Okay. Well, forget the party part.</p> <p>9 A. Okay.</p> <p>10 Q. Were you aware that Mr. Brunel flew in three</p> <p>11 12-year-old girls for Mr. Epstein's pleasure on his</p> <p>12 birthday?</p> <p>13 A. No, I was not aware of that, no.</p> <p>14 Q. And you have no recollection of having young</p> <p>15 women that young on flights that you were flying on?</p> <p>16 A. That's correct.</p> <p>17 MR. PIKE: Form.</p> <p>18 BY MS. EZELL:</p> <p>19 Q. I don't have any other questions. Thank you.</p> <p>20 A. Thank you.</p> <p>21 MR. EDWARDS: Mike, I don't really think</p> <p>22 anybody -- I'm sorry.</p> <p>23 CROSS-EXAMINATION</p> <p>24 BY MR. WILLITS:</p> <p>25 Q. Richard Willits here. I just have one</p>
<p>194</p> <p>1 Jeffrey Epstein?</p> <p>2 A. I do not know.</p> <p>3 Q. Were you ever given any properties by Mr.</p> <p>4 Epstein?</p> <p>5 A. No.</p> <p>6 Q. You said that you did know Mr. Jean Luc</p> <p>7 Brunel?</p> <p>8 A. Yes, I knew of him - and it was as an</p> <p>9 acquaintance - as a passenger.</p> <p>10 Q. Did you fly him to and from Paris?</p> <p>11 A. Yes.</p> <p>12 Q. Do you ever remember flying three girls from</p> <p>13 Paris for Mr. Brunel --</p> <p>14 MR. PIKE: Form.</p> <p>15 Q. -- to be guests of Mr. Epstein?</p> <p>16 MR. PIKE: Form.</p> <p>17 A. I can't say that I remember that exactly,</p> <p>18 no, and I didn't know who - whose guests they were</p> <p>19 for who.</p> <p>20 Q. Do you remember flying three young girls to</p> <p>21 Mr. Epstein's birthday party?</p> <p>22 MR. PIKE: Form.</p> <p>23 A. I don't --</p> <p>24 Q. I'm sorry, I meant from France.</p> <p>25 MR. PIKE: Form.</p>	<p>196</p> <p>1 question, sir. I didn't catch the complete and full</p> <p>2 spelling of your name.</p> <p>3 A. My name?</p> <p>4 Q. Yes, sir - the witness?</p> <p>5 A. It's Larry - Lima, Alpha, Romeo, Romeo,</p> <p>6 Yankee - and last name is Morrison - Mike, Oscar,</p> <p>7 Romeo, Romeo, India, Sierra, Oscar, November.</p> <p>8 MR. WILLITS: Thank you, sir.</p> <p>9 MR. EDWARDS: Mike, shoot.</p> <p>10 MR. PIKE: Thank you. Thank you.</p> <p>11 CROSS-EXAMINATION</p> <p>12 BY MR. PIKE:</p> <p>13 Q. Mr. Morrison, my name is Michael Pike. I</p> <p>14 represent Jeffrey Epstein.</p> <p>15 A. Hi.</p> <p>16 Q. I'm going to ask you a couple of questions.</p> <p>17 If you do not hear me, please ask me to repeat the</p> <p>18 question - as I'm on a telephone - and by virtue of being</p> <p>19 on the telephone, I've noticed that there's some lag time</p> <p>20 between some answers and responses.</p> <p>21 MR. PIKE: So, Brad, interrupt me, if I'm</p> <p>22 talking over the witness as well.</p> <p>23 BY MR. PIKE:</p> <p>24 Q. Mr. Morrison, Mr. Edwards was talking to you</p> <p>25 about your knowledge and information regarding passengers</p>

<p style="text-align: center;">197</p> <p>1 on Mr. Epstein's plane from January 1, 2001, up until the 2 time you stopped flying. Do you recall some of those 3 questions? 4 A. Yes. 5 Q. With regard to the female passengers that Mr. 6 Edwards discussed with you, do you recall if any of them 7 ever left the plane in a scared manner? 8 A. No, no. 9 Q. Did any of these girls ever appear to be 10 disheveled to you in any way? 11 A. No. 12 Q. Did any of these girls that were on the plane 13 ever claim to be battered or sexually assaulted? 14 A. Not to me, no. 15 Q. Did any of these women appear to be in shock 16 to you? 17 A. No. 18 MR. EDWARDS: Object to the form. 19 BY MR. PIKE: 20 Q. Were any of these women ever crying as they 21 exited the plane when you were the pilot? 22 A. No, not that I saw. 23 Q. Did any of these women appear to be injured as 24 they exited the plane when you were a pilot? 25 A. No, not that I saw.</p>	<p style="text-align: center;">199</p> <p>1 first. 2 MR. PIKE: I have no further questions. 3 MR. EDWARDS: I have a couple more - just 4 follow-up - from what Kathy asked. 5 REDIRECT EXAMINATION 6 BY MR. EDWARDS: 7 Q. Did any of the people - along Mike Pike's 8 lines - did any of the girls on the airplane tell you 9 that he pled guilty to two felonies in court? 10 MR. PIKE: Form. 11 A. No, I haven't - I have not spoken to Mr. 12 Epstein. I don't believe -- 13 Q. No, no. I think the question was: Did any of 14 the girls tell you that Mr. Epstein pled guilty in court? 15 A. Which girls? 16 Q. Any of the girls on the airplane that we're 17 talking about. 18 A. No, I don't think -- Actually, I don't 19 know when he pled because I think I was - stopped 20 flying by then. 21 Q. So there were a lot of things that happened on 22 the airplane that the girls didn't necessarily tell you 23 about, right? 24 MR. PIKE: Form. 25 A. That I wasn't -- Like I say, going back to</p>
<p style="text-align: center;">198</p> <p>1 Q. Did any of these women ever tell you, as the 2 captain of the plane, that they were forced to do 3 something against their will while a passenger on the 4 plane? 5 MR. EDWARDS: Object to the form. 6 A. I was -- Actually, to correct the 7 question, I guess I was not captain - I was flight 8 engineer - but, no. 9 Q. Did they ever tell you that they had been 10 forced to do anything inappropriate? 11 A. No. 12 Q. Did they ever tell you that they had been 13 assaulted in any way? 14 A. No. 15 Q. Did they ever tell you that they had been 16 inappropriately touched in any way? 17 A. No. 18 MR. EDWARDS: Form. 19 BY MR. PIKE: 20 Q. Did they ever tell you or did you ever hear of 21 anyone claiming that they had been sexually assaulted, 22 battered, or raped while on the plane? 23 MR. EDWARDS: Form. 24 A. No. 25 MR. REINHART: Give him a chance to object</p>	<p style="text-align: center;">200</p> <p>1 - there was not even an opportunity or window for 2 that question, because I believe it was after 3 February of '07. 4 Q. That's true. 5 Did any of the girls on the airplane tell you 6 about things that happened on the airplane that he later 7 pled guilty to? 8 MR. PIKE: Form. 9 A. No. 10 Q. Did any of the girls on the airplane really 11 talk to you? 12 A. No. 13 Q. Okay, so all of this is kind of silly. 14 Alright. Got it. 15 [REDACTED] would accompany Ms. Maxwell. When you 16 say "would accompany her," what did you mean about that? 17 A. She was like her assistant. Actually, I 18 don't -- I didn't see [REDACTED] very many times. I don't 19 know when she stopped working there, but she would -- 20 Yeah, I just -- She would be on trips with her -- 21 Q. And did you -- 22 A. -- and, I think, handle her logistics 23 issues and stuff like that. 24 (Please continue to Volume II.) 25</p>



<p style="text-align: center;">205</p> <p>1 The Redirect Examination by Mr. Edwards continued from 2 Volume I as follows: 3 Q. Do you even know what "work" would mean for 4 Ms. Maxwell? 5 MR. PIKE: Form. 6 A. No. I could not define her job 7 description. 8 Q. I mean, would it surprise you if she was Ms. 9 Maxwell's lesbian sex slave? 10 MR. PIKE: Form. 11 A. That would surprise me. 12 Q. Okay. Be surprised. 13 Did you have to sign a confidentiality 14 agreement at any point in time to work for Ms. Maxwell 15 and/or Jeffrey Epstein? 16 A. I may have when I first hired on - 17 standard protocol. I don't -- I can't remember for 18 sure. I may have. 19 Q. Do you have a copy of that confidentiality 20 agreement? 21 A. Oh, I doubt it. It's been so long. I 22 doubt it. 23 Q. Were you allowed to keep a copy of it or did 24 they keep it? 25 A. Honestly, I cannot remember.</p>	<p style="text-align: center;">207</p> <p>1 A. No, no. I don't remember going places and 2 bringing people back that we didn't have, you know, 3 that was with us originally, you know. 4 Q. But considering how you were somewhat cordoned 5 from the rest of the plane, would you always know if you 6 brought somebody back? 7 MR. PIKE: Form. 8 A. I can't say a hundred percent of the time, 9 but most, yes. You -- Because, you know, you've got 10 additional baggage. I was always downstairs loading 11 bags while the passenger was boarding, but. 12 Q. So if there were three girls that boarded an 13 airplane, came back with Jean Luc Brunel and Jeffrey 14 Epstein, from your testimony, you either did not see them 15 or it happened to be a flight that you just weren't on. 16 A. Well, I was - more than likely I was on 17 the flight, but I can't remember that exact passenger 18 configuration -- 19 Q. Okay. 20 A. -- as far as number of passengers. 21 MR. EDWARDS: Alright. I don't have 22 anything else. Unless anybody else does, I'm 23 sure there's going to be an instruction to read 24 or waive. 25 MR. REINHART: He'll read.</p>
<p style="text-align: center;">206</p> <p>1 Q. How do you know Larry Visoski has a place at 2 the Zorro Ranch? 3 A. Because I visited it when we're out there. 4 It's where he stays when we stay down at Ranch 5 Central. 6 Q. Did he tell you what he did to get that ranch? 7 A. No. 8 Q. I mean, he certainly didn't say he paid for it 9 himself, did he? 10 A. Well, no. I didn't ask. I would assume 11 that. I would assume it. 12 Q. When you say you flew Jean Luc Brunel to and 13 from Paris, was that in the company of Jeffrey Epstein? 14 A. Oh, yeah. I never -- Boeing never went 15 anywhere without Jeffrey. 16 Q. I know you said you don't remember three girls 17 coming back. Are you saying that didn't happen or you 18 just don't remember it? 19 A. I don't remember that. 20 Q. So whether it happened or whether it did not 21 happen, you have no knowledge of it? 22 A. I can't remember that, no, I do not. 23 Q. Do you remember going to foreign countries and 24 bringing back any girls? 25 MR. PIKE: Form.</p>	<p style="text-align: center;">208</p> <p>1 MR. EDWARDS: He'll read. 2 3 (The deposition concluded at 2:20 p.m.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

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1                    CERTIFICATE OF OATH  
 2  
 3  
 4  
 5  
 6 STATE OF FLORIDA )  
 7  
 8 COUNTY OF BROWARD )  
 9  
 10                    I, the undersigned authority, certify that  
 11 LARRY EUGENE MORRISON personally appeared before me  
 12 and was duly sworn.  
 13  
 14  
 15                    WITNESS my hand and official seal this  
 16 10th day of October, 2009.  
 17  
 18  
 19  
 20  
 21                    JENNIFER D. DILORENZO  
                      Notary Public - State of Florida  
                      My Commission No. DD 747526  
                      Expires: March 7, 2012  
 22  
 23  
 24  
 25

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1                    CORRECTION SHEET  
 2 RE: L.M. vs Jeffrey Epstein  
                      Case No: 502008CA028051  
 3                    Deposition of: LARRY EUGENE MORRISON  
                      Taken: October 8, 2009  
 4  
 5 PAGE NO. LINE NO. CORRECTION OR CHANGE  
 6 \_\_\_\_\_  
 7 \_\_\_\_\_  
 8 \_\_\_\_\_  
 9 \_\_\_\_\_  
 10 \_\_\_\_\_  
 11 \_\_\_\_\_  
 12 \_\_\_\_\_  
 13 \_\_\_\_\_  
 14 \_\_\_\_\_  
 15 Under penalties of perjury, I declare that I have read  
 16 my deposition and that it is true and correct subject  
 17 to any changes in form or substance entered here.  
 18 Signed this \_\_\_\_ day of \_\_\_\_\_, 2009  
 19 \_\_\_\_\_  
 20 LARRY EUGENE MORRISON, Deponent  
 21  
 22  
 23  
 24  
 25

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1                    REPORTER'S DEPOSITION CERTIFICATE  
 2  
 3 STATE OF FLORIDA )  
 4  
 5 COUNTY OF BROWARD )  
 6  
 7 I, JENNIFER D. DILORENZO, Shorthand  
 8 Reporter, certify that I was authorized to and did  
 9 stenographically report the deposition of LARRY EUGENE  
 10 MORRISON; that a review of the transcript was  
 11 requested; and that the transcript is a true and  
 12 complete record of my stenographic notes.  
 13 I further certify that I am not a  
 14 relative, employee, attorney, or counsel of any of the  
 15 parties, nor am I a relative or employee of any of the  
 16 parties' attorney or counsel connected with the  
 17 action, nor am I financially interested in the action.  
 18  
 19 Dated this 10th day of October, 2009.  
 20  
 21  
 22                    JENNIFER D. DILORENZO,  
                      Shorthand Reporter.  
 23  
 24  
 25

20  
 21  
 22  
 23  
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 25

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