

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY, FLORIDA

█

Plaintiff,

vs.

Case No. 502008CA028051
XXXXMB AD

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF
LARRY EUGENE MORRISON
TAKEN ON BEHALF OF THE PLAINTIFF

VOLUME I
Pages 1 to 200

October 6, 2009
10:55 a.m.

█

Jennifer DiLorenzo, court reporter



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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

6

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.

7

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

8

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 -



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<p style="text-align: center;">9</p> <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 style="text-align: center;">11</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>
<p style="text-align: center;">10</p> <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&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 style="text-align: center;">12</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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1 Q. Why the change?
 2 A. It offered an opportunity -- Well, one was
 3 I enjoyed flying - and the 727 was being replaced by
 4 a BBJ, which is a two-man airplane, not a three-man
 5 airplane - three-pilot airplane - and it gave me the
 6 opportunity to become a Director of Maintenance, and
 7 it was a challenge. You know, bringing - upstarting
 8 an airliner on a private ticket or a VIP ticket is
 9 really challenging, and I enjoy the challenge of
 10 working and developing the program and stuff.
 11 Q. Well, my understanding, Leslie Wexner is
 12 generally - he's in Ohio, right?
 13 A. No, he's got other places. I mean -- No,
 14 he's like anyone, he's - in his category - he's got
 15 multiple homes and --
 16 Q. Well, when you would maintain his aircraft,
 17 would that be in Ohio --
 18 A. Yes. We were based --
 19 Q. -- or elsewhere?
 20 A. We were based at Lane Aviation.
 21 MR. REINHART: Hold on one second. You
 22 have to let him finish asking the question
 23 before you answer.
 24 THE WITNESS: Okay. I'm sorry.
 25 BY MR. EDWARDS:

14

1 Q. I'm sorry, have you ever had your deposition
 2 taken before?
 3 A. No.
 4 Q. You definitely never had your deposition taken
 5 before while somebody else is trying to eat at the same
 6 time they're trying to ask the questions - that's very
 7 bizarre.
 8 A. Yes, yes.
 9 Q. I meant to do this before I got here. But,
 10 regardless, I'll wait until you finish your answer before
 11 I ask my next question; you do the same thing. "Uh-huh"
 12 or "uh-uh," they kind of look the same on the record, so
 13 try to give us a "yes" or "no" or something we
 14 understand.
 15 A. Alright.
 16 Q. If I ask a question that was a bad question or
 17 something you don't understand - I've asked bad questions
 18 before - say, "I don't get it." I'll ask a better
 19 question.
 20 A. Okay.
 21 Q. You were working with Leslie Wexner. You got
 22 the job there starting in 1988. On a day-to-day basis,
 23 what would you be doing?
 24 A. Maintenance, aircraft maintenance,
 25 tracking of aircraft maintenance, cleaning of

15

1 aircraft. I mean, whatever it takes to keep a
 2 corporate flight department operating.
 3 Q. Did you know back then of his relationship, if
 4 any, with Jeffrey Epstein?
 5 A. Not immediately, no.
 6 Q. When is the first time that you knew of a
 7 reputation or a relationship between Wexner and Epstein?
 8 A. Would have had to probably be around maybe
 9 '98, '99.
 10 Q. How do you become aware that they know one
 11 another?
 12 A. Because Jeffrey, every one -- That's when
 13 I became a flight engineer on the Boeing, and every
 14 once in a while Jeffrey would ride on the Boeing,
 15 that's all - that's all I knew.
 16 Q. How did it come about that he would ride on
 17 Wexner's Boeing?
 18 A. They were business associates, I think.
 19 Q. As far as you know, they were business
 20 associates.
 21 A. Right.
 22 Q. Did you understand the business relationship
 23 between the two?
 24 A. Well, I believe it's public knowledge
 25 that, I think, Jeffrey managed Mr. - some of Mr.

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1 Wexner's funds.
 2 Q. Is that something that Mr. Wexner told you?
 3 A. No.
 4 Q. Is that something that somebody of Mr.
 5 Wexner's organization would have told you?
 6 A. No.
 7 Q. Is that something that Jeffrey Epstein told
 8 you?
 9 A. No.
 10 Q. Is that just reading articles that speculate
 11 as to the business relationship between the two or do you
 12 got something more for me?
 13 A. No, it's just - it's speculation and, you
 14 know, what I've read, you know.
 15 Q. I mean, like you say, to me it's common
 16 knowledge --
 17 A. Right.
 18 Q. But it's only because of what I've read. I
 19 don't have a specific person that I could cite to to say
 20 that, do you?
 21 A. Right. No, just - just periodicals.
 22 Q. What's your understanding of the personal
 23 relationship, if any, between Wexner and Epstein?
 24 MR. GOLDBERGER: Form.
 25 A. Don't know.



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



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<p>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>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>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>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>



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<p style="text-align: center;">25</p> <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>	<p style="text-align: center;">27</p> <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>
<p style="text-align: center;">26</p> <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>	<p style="text-align: center;">28</p> <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>



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<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>



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<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>



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



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<p style="text-align: center;">41</p> <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 style="text-align: center;">43</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. 21 (Mr. Goldberger exited.) 22 BY MR. EDWARDS: 23 Q. So '89 to '01, if I wanted all of the flight 24 logs, who would I request those from - Tim Staley? 25 A. Don't know. I don't know who --</p>
<p style="text-align: center;">42</p> <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 style="text-align: center;">44</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>



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1 for these, you know.
 2 Q. Did Leslie Wexner ever tell you that he
 3 allowed Jeffrey Epstein to serve in some sort of
 4 capacity, representative capacity, for any of these
 5 companies?
 6 A. No. He would never say that to me
 7 anyways, no.
 8 Q. What's the first time you ever saw Jeffrey
 9 Epstein?
 10 A. Can't say. I'm not sure.
 11 Q. I think you saw him before you started working
 12 for him or with him?
 13 A. Oh, yeah, that's -- Where I first saw him
 14 was when I flew him on The Limited 727.
 15 Q. What year do you think that was?
 16 A. It would have had to have been --
 17 Q. Talking late '80s, early '90s?
 18 A. Late '90s.
 19 Q. Late '90s?
 20 A. Yeah, probably - mid to late '90s.
 21 Q. Well, I mean, if you're taken over with
 22 Jeffrey Epstein in, what, 2001 --
 23 A. Correct.
 24 Q. -- then you're talking late '90s is the first
 25 time you see him?

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1 A. Well, mid -- I don't know exactly. I
 2 can't really say, really.
 3 Q. I won't hold you to it. It is what it is.
 4 Mid to late '90s, if I wanted the flight logs
 5 that have him on it, on the airplane, who would I
 6 subpoena to get those records?
 7 A. I have no idea.
 8 Q. Are they turned into the FAA, to the best of
 9 your knowledge?
 10 A. No, the FAA doesn't require them.
 11 Q. So FAA does not get the flight -- Well, what's
 12 the point of even keeping these?
 13 A. Sometimes I think the IRS -- I mean, this
 14 is on assumption, I'm not even sure, but mostly for
 15 like IRS tracking for if you have people that have
 16 dual homes, dual statehoods, or whatever.
 17 (Mr. Goldberger entered.)
 18 MR. GOLDBERGER: Can we take a time out?
 19 (Short break.)
 20 (Mr. Pike appeared via telephone to
 21 replace Mr. Goldberger.)
 22 BY MR. EDWARDS:
 23 Q. FAA flight logs - do you know why they're
 24 generated, how they're generated, if they were generated
 25 back in the Wexner days?

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1 A. They were -- They were generated, but I
 2 don't know, you know, why - what the particular
 3 reasoning was for it.
 4 Q. Do you know if Terry (sic) Staley would have
 5 been the one to forward those flight logs to the FAA?
 6 A. No, no, no. I -- They were all just for
 7 business use - not forwarded to the FAA.
 8 Q. Okay. How --
 9 A. The FAA doesn't care about flight logs.
 10 Q. How did the FAA monitor when that plane took
 11 off?
 12 A. Flight plans.
 13 Q. And was it your understanding that when the
 14 plane took off, the FAA was unaware as to who was ever on
 15 it?
 16 A. Pretty much, yeah. They don't care about
 17 names. When you file flight plans with the flight
 18 service station or via electronically, all they care
 19 about is souls on board, contact information, flight
 20 routing, things like that.
 21 Q. Are there time limits as to when the plane is
 22 allowed to take off?
 23 A. Yeah, usually -- From what point? What do
 24 you mean? Time of the day or --
 25 Q. Yeah, yeah, time of the day. I understand

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1 that there's some time where if it's too late they can't
 2 take off, right?
 3 A. Only where there's a curfew on the airport
 4 - not all airports, no. No, airplanes can fly any
 5 time unless that airport has a noise curfew or
 6 something, yeah.
 7 Q. Did you ever know of Wexner's plane to take
 8 off after ten o'clock p.m.?
 9 A. Yes. Yeah.
 10 Q. Were you ever on that plane when it did?
 11 A. Probably, yeah, yeah.
 12 Q. Were you ever on that plane when there were
 13 girls on the plane?
 14 A. Describe -- Define "girls." On the Wexner
 15 airplane?
 16 Q. Yes.
 17 A. There would be ladies and his daughters.
 18 I mean --
 19 Q. Other than family members.
 20 A. There would be business associates. If
 21 you're talking young women, yes, business associates
 22 from the divisions.
 23 Q. Have you ever been on the plane when there
 24 were girlfriends of Leslie Wexner?
 25 A. Only when Abigail - before his - became



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<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>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>
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<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>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>



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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

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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

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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

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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



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



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



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1 don't know how they found that job, but they started
 2 working for Jeffrey then, but they still --
 3 Q. Did you ask them?
 4 A. No, I don't think -- I've never asked
 5 them, "How --
 6 Q. Did Jeffrey --
 7 A. -- did you meet them?"
 8 Q. -- have a plane in the same hangar?
 9 MR. REINHART: Hold on. Let him finish
 10 his answer.
 11 MR. EDWARDS: I'm sorry. I thought you
 12 were finished.
 13 MR. PIKE: This is Michael Pike. Let him
 14 finish his question because, keep in mind - you
 15 finish your question, let him finish his answer
 16 - keep in mind, I'm on the phone, so I'm having
 17 a hard time hearing his response in the
 18 background.
 19 MR. EDWARDS: You're actually on the other
 20 end of the table. Do you want us to try to move
 21 the phone closer?
 22 MR. PIKE: Yes, that would be good.
 23 MR. EDWARDS: I'll do that for you, man.
 24 I'm sorry, I really did forget that you were
 25 here.

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1 MR. PIKE: Not a problem. I've objected
 2 to form a couple of times. I'm not quite sure
 3 if that was even heard, but that's neither here
 4 nor there.
 5 MR. EDWARDS: We'll say the last ten
 6 questions you objected to form. I got you.
 7 What was my last question, Pike? You
 8 don't even remember.
 9 MR. REINHART: You asked him conversations
 10 he had with Larry Visoski and Dave Rodgers about
 11 how they come came to work for Epstein.
 12 MR. EDWARDS: Good.
 13 A. I really never queried them on how they
 14 come to work for Jeffrey. I think Dave was hired
 15 first and he brought - this is all speculation - and,
 16 I think, he brought Larry on board.
 17 Q. So as far as you know, however you know, David
 18 Rodgers was the first Epstein contact and then Larry
 19 Visoski rode it in.
 20 A. The way I understand, yeah.
 21 Q. How did you become involved in the
 22 three-person train to Epstein?
 23 A. When it became apparent that Jeffrey, or
 24 Mr. Epstein, was going to buy the 727, Larry
 25 approached me, that if I would want to, you know,

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1 help them with the airplane, get, you know, become a
 2 flight engineer - Director of Maintenance - on it.
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 Q. But the hangar we're talking about is in Ohio.
 13 A. Yeah, Lane Aviation.
 14 Q. You would see them basically on a day-to-day
 15 basis because the aircraft that you were a technician
 16 for --
 17 A. Right.
 18 Q. -- was very close in proximity to the aircraft
 19 that they were piloting.
 20 A. Yes.
 21 Q. They approach you at some point in time and
 22 say what specifically?
 23 A. I can't remember the specific
 24 conversations, but it was like, you know, asked me if
 25 I would be interested in, if Jeffrey bought the 727

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1 being, you know, the flight engineer and help them,
 2 you know, get the flight department going, and I told
 3 them I would.
 4 Q. And why did you say "yes" considering that you
 5 had a boss in Leslie Wexner who was seemingly pretty good
 6 to you for the last ten years?
 7 A. Oh, he's excellent.
 8 Q. Yes.
 9 A. No, fine flight department and Mr. Wexner
 10 is a fine person.
 11 Q. Right.
 12 A. The reason being is, you know, I already
 13 stated this I think twice before, was that I wanted
 14 to be able to continue to fly and that would give me
 15 the opportunity to continue to fly as a flight
 16 engineer and the challenge of starting this airplane.
 17 Q. Right. I didn't ignore you. I heard you say
 18 that, but then I also heard you say he brought a brand
 19 new plane.
 20 A. It was only a two-man airplane --
 21 Q. So then he would have --
 22 A. -- and the modern aircraft could only have
 23 two pilots, right.
 24 Q. Got you. I understand.
 25 So they approach you with this prospect of the



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1 two of them - Dave Rodgers and Larry Visoski - becoming
 2 the pilots for the 727 --
 3 A. Correct.
 4 Q. -- that Epstein's buying and, "Hey, would you
 5 like to be a part of it?"
 6 A. Right.
 7 Q. I mean, that's the gist of it.
 8 A. Correct, that would be the gist of it.
 9 Q. And your response was?
 10 A. Yes, I would - you know, if it came to be,
 11 I would consider it. Obviously, you know, salary had
 12 to come in and everything else, but I said, "Yeah, I
 13 would be interested in it."
 14 Q. What's the next conversation that you had and
 15 with whom?
 16 A. I don't know. There were several
 17 conversations, but they were all with Dave and Larry
 18 both, you know, calling back and forth, but.
 19 Q. About what? Was it about salary, about the
 20 position?
 21 A. Salary, what the benefits were, you know,
 22 stuff like that. No, the position was pretty much
 23 defined. I mean, it's the flight engineer, Director
 24 of Maintenance position.
 25 Q. And this brings us up in our timeline to 2001,

70

1 you think?
 2 A. Correct, that's when I hired on and
 3 actually moved to Florida was January 2001.
 4 Q. Prior to 2001, had you heard the name
 5 Ghislaine Maxwell?
 6 A. Yes.
 7 Q. How would you have heard Ghislaine Maxwell?
 8 A. She had been a passenger on the 727 once
 9 or twice.
 10 Q. The 727, I mean?
 11 A. When it was under Limited.
 12 Q. Yeah, yeah, that's the point I'm trying to
 13 make. I mean, this could get confusing on the record.
 14 It's not confusing to me, but on the record it could be
 15 because the 727 was Wexner's, then it was Epstein, so
 16 you're talking about --
 17 A. When it was under Mr. Wexner's control.
 18 Q. What year do you think that was?
 19 A. It would have been in the late '90s.
 20 Again, like I say, when - probably some time around
 21 the time - you know, had to be late '90s --
 22 Q. Did she --
 23 A. -- maybe 2000.
 24 Q. Did she seem like a friend of Leslie Wexner's
 25 to you?

71

1 A. I don't know. I don't know.
 2 Q. I mean, how did she get on his private
 3 airplane? I would imagine strangers don't just walk on,
 4 right?
 5 A. Yeah, but I don't know. I don't know what
 6 people's associations are together when, you know.
 7 Q. Okay.
 8 A. I don't know if it's business association,
 9 social associations, or what.
 10 Q. How many times --
 11 MR. PIKE: Let me object to the form of
 12 that question.
 13 MR. EDWARDS: Okay. Noted.
 14 BY MR. EDWARDS:
 15 Q. How many times was she on that airplane when
 16 it was owned by Leslie Wexner?
 17 A. Not many, but I can't give you an exact.
 18 Q. Was she ever naked on the airplane?
 19 A. Not that I'm aware of.
 20 Q. I mean, that's something that you would
 21 probably remember, right?
 22 A. Well --
 23 MR. PIKE: Form.
 24 A. Yeah. I mean --
 25 Q. I'm not really trying to be funny, but I would

72

1 assume I would remember it.
 2 A. Not that I'm aware of.
 3 Q. Do you remember her bringing other girls on
 4 the airplane with her?
 5 A. No.
 6 Q. You remember her getting on the airplane
 7 alone?
 8 A. I can't say for sure.
 9 Q. Alright. Maybe this will jog your --
 10 A. I mean, she was never just alone-alone.
 11 Like the only passenger or.
 12 Q. Yes.
 13 A. No, no, always with - when other people
 14 were on board.
 15 Q. And you just can't remember whether she
 16 brought on board with her a male or a female; is what
 17 you're saying, right?
 18 A. No, I mean -- Restate the question. How
 19 did you --
 20 Q. Sorry.
 21 A. Define "alone."
 22 Q. I don't mean, you know, if there's 15
 23 passengers and she gets on. I'm saying: Do you remember
 24 her getting on and being accompanied by - either they
 25 took the same car to the airport, they walked the runway



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<p style="text-align: center;">73</p> <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 style="text-align: center;">75</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 style="text-align: center;">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 style="text-align: center;">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>



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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.

78

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

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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,

80

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.



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<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>



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1 with Jeffrey.

2 Q. They hired on with Jeffrey to pilot the 727?

3 A. No. He had two other airplanes prior to

4 that. He had a Hawker that he had for a very short

5 period and then he bought - traded it or sold it. I

6 don't know what he did with it, but then he got the

7 Gulfstream.

8 Q. So Larry Visoski and David Rodgers were pilots

9 for Jeffrey Epstein when he had the Hawker also?

10 A. Yes.

11 Q. And what year are we talking about there?

12 A. I have no idea.

13 Q. Well, if you sign on with him in '91, it's

14 before that year, right?

15 A. No, no, I signed in '01 - January '01.

16 Q. '01.

17 A. I don't know how long they flew for

18 Glimcher before that airplane went away and how quick

19 they got on with Jeffrey. I don't know. Somewhere

20 between '88 and 2001, they --

21 Q. During --

22 A. -- left Glimcher and --

23 Q. During '88 and '01, do you remain in contact

24 with Larry Visoski and David Rodgers?

25 A. On and off. They eventually moved, you

86

1 know, to - moved away from Columbus when they hired

2 on with Jeffrey, so they weren't in the hangar every

3 day.

4 Q. Where did they go - do you know?

5 A. I think Dave went to New York and Larry

6 went back to South Florida.

7 Q. Do you know why?

8 A. Well, because I think Jeffrey gave them

9 the choice of living where they would like, I

10 believe. I mean, that's --

11 Q. That's what they've said.

12 A. That's what they've said.

13 Q. Okay, and Larry chose South Florida, David

14 Rodgers chose New York?

15 A. Right.

16 Q. And Epstein had a place for them both wherever

17 they wanted to go?

18 A. Well, they owned their own homes or

19 something. I don't know what their living

20 arrangements were.

21 Q. Did you know Larry Rodgers or David Visoski

22 before this?

23 A. Before?

24 MR. PIKE: Form.

25 BY MR. EDWARDS:

87

1 Q. Before your conversation with them about

2 becoming involved with Jeffrey Epstein.

3 A. Yes.

4 Q. How?

5 A. Like we discussed. We've been through

6 this already. When they were at Glimcher they had an

7 airplane in the hangar. We would see them

8 sporadically and we would talk.

9 Q. I'm sorry, bad question. I don't mean on a

10 business relationship. On a social relationship, did you

11 hang out with them --

12 A. Oh, no.

13 Q. -- outside of this?

14 A. No, no.

15 Q. I apologize.

16 So - and I only asked that question because

17 some years later then you're in contact with them and

18 they asked you to become involved with Jeff Epstein.

19 A. Uh-huh.

20 Q. But that is because of a business relationship

21 solely that you had with them --

22 A. Oh, yeah.

23 Q. -- years before?

24 A. I didn't know them personally.

25 MR. PIKE: Form.

88

1 BY MR. EDWARDS:

2 Q. Okay. Alright. So in 2001, is that the year

3 that you get a telephone call from one or two of these

4 people?

5 MR. PIKE: Form.

6 A. It would be either late 2000 or early

7 2001. I don't -- These transactions don't happen

8 overnight --

9 Q. Yeah.

10 A. -- buying an airplane. So it could have

11 happened in, you know, November or started talking in

12 November, like, "Well, you know, would you be

13 interested if Jeffrey gets the airplane or buys the

14 airplane?" you know, to when I actually hired on.

15 Q. Did you ever talk to Ghislaine Maxwell - ever?

16 A. After I had hired on, yes.

17 Q. After you hired on with Epstein.

18 A. Yes.

19 Q. We'll go up to her.

20 So when is it that you hired on with Jeffrey

21 Epstein?

22 A. I think I began in January of '01.

23 Q. In January of '01, do you start getting a

24 paycheck from Jeffrey Epstein?

25 A. Yes.



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<p>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>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>90</p> <p>1 communication with Jeffrey Epstein that results in your 2 employment with JEGE? 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>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>



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1 A. Yes.

2 Q. And do you remember where you went?

3 A. Very first flight, no, because we didn't

4 fly it immediately. We upgraded some avionics and

5 did modifications.

6 Q. What modifications did he want to that plane?

7 A. Just changed the carpet and some fabrics,

8 upgraded the radar, upgraded the navigation - the

9 flight manifest systems.

10 Q. Did he change the interior at all?

11 A. No. We removed that one small table and

12 chair - that's it, but we did not really change what

13 you would consider the floor plan.

14 Q. Now, try to give me a visual appreciation of

15 the inside of the plane. If I'm looking out the cockpit

16 back towards the back of the plane; what am I going to

17 see?

18 A. A door.

19 Q. That's it?

20 A. That's it, yeah.

21 Q. Just an empty room with a door?

22 A. No, no. The door's always closed. If the

23 door's open you will see the forward salon, and in

24 the forward salon there is a conference table, a

25 high/low table, some divans, and some single seats.

94

1 Q. What's behind that?

2 A. The galley.

3 Q. The what?

4 A. The kitchen - galley.

5 Q. Okay.

6 A. Behind that is the aft salon, which is

7 just two round divans.

8 Q. And?

9 A. After that is the office, which is a -

10 consists of a credenza and a desk, or divan and a

11 desk and chairs.

12 Q. How many of these areas can you close off or

13 partition?

14 MR. PIKE: Form.

15 A. Each one. And after that there's the

16 state room.

17 Q. And in the state room - how big is the state

18 room?

19 A. Consists of a queen size bed and two

20 single seats.

21 Q. Have you ever been back in the state room?

22 A. Oh, yes. Yeah.

23 Q. When's the first time you flew on the airplane

24 with Jeffrey Epstein back in 2001, after he acquired the

25 727?

95

1 A. Can't remember the first flight. Like I

2 say, it was down for a while - probably - I think it

3 was - had to take at least three to four months maybe

4 to get it --

5 Q. And did you know of him flying on the airplane

6 with girls accompanying him?

7 MR. PIKE: Form.

8 A. I don't --

9 Q. Back in 2001.

10 A. With girls accompanying him?

11 Q. Yes.

12 A. Yes.

13 Q. Where would he pick the girls up from?

14 MR. PIKE: Form.

15 A. I don't know. They would arrive with him,

16 you know, out of Palm Beach or out of New York. I

17 don't even remember where we went the first time.

18 The first flight was probably New York, I think.

19 Q. Is it a private airport in New York where you

20 would usually pull into or a commercial airport?

21 A. I think the first time we started going up

22 there, I think, we were using White Plains, which is

23 - actually, it's not a private airport. They all

24 have some commercial service. It would have been

25 White Plains, I believe, then later we started using

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1 Kennedy, and the service was so terrible in Kennedy

2 and so expensive we went to Newark.

3 Q. When you would fly into White Plains or to

4 Kennedy or Newark, would you always get off of the

5 airplane or would you sometimes stay on and wait for

6 passengers to board?

7 A. I don't understand.

8 Q. Well, when you stop an airplane --

9 A. Right.

10 Q. -- sometimes you get off the airplane and you

11 go either through a, you know, through the airport or you

12 go somewhere else, or your option is to stay on the

13 airplane and not get off and wait for other people to get

14 on before you take off.

15 A. Oh, no.

16 MR. REINHART: I'm sorry, can we clarify

17 the "you"? Do you mean him personally or the

18 people who were passengers on the plane that he

19 was flying?

20 Q. I'm talking about you personally.

21 A. Oh, no, it was rare that we ever did a

22 through flight. We would normally go from Point A to

23 Point B, and that was the destination.

24 Q. I assume when he buys the plane initially it

25 was in Ohio, right?



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<p style="text-align: center;">97</p> <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>	<p style="text-align: center;">99</p> <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>
<p style="text-align: center;">98</p> <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>	<p style="text-align: center;">100</p> <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>



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<p style="text-align: center;">101</p> <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 style="text-align: center;">103</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 style="text-align: center;">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 style="text-align: center;">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] a?
 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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<p style="text-align: center;">109</p> <p>1 Indyke and [REDACTED]?</p> <p>2 A. Not that I remember, no.</p> <p>3 Q. How about Leslie Groff?</p> <p>4 A. I don't think Leslie lived there.</p> <p>5 Q. Do you remember that name?</p> <p>6 A. Yes. She's Mr. Epstein's secretary.</p> <p>7 Q. What about [REDACTED]?</p> <p>8 A. [REDACTED] no, I don't think so.</p> <p>9 Q. Jeff Fuller?</p> <p>10 A. I don't know Jeff Fuller. I don't even</p> <p>11 know Jeff Fuller.</p> <p>12 Q. Do you know the name Jean Luc Brunel?</p> <p>13 A. Yes.</p> <p>14 Q. How do you know that name?</p> <p>15 A. He's been -- He was a passenger on a few</p> <p>16 of our flights.</p> <p>17 Q. Do you know why?</p> <p>18 A. I think he was -- I don't know for sure.</p> <p>19 He's in a modeling business with Mr. Epstein, I</p> <p>20 believe.</p> <p>21 Q. MC2? Do you know that name - MC2 Modeling</p> <p>22 Agency - used to be Karin Modeling Agency, now it's MC2?</p> <p>23 A. No.</p> <p>24 Q. How do you know about his and Mr. Epstein's</p> <p>25 modeling agency? How do you know that?</p>	<p style="text-align: center;">111</p> <p>1 of the MC2 shoots?</p> <p>2 A. I never heard -- There was one incident --</p> <p>3 The only thing I remember about it is they were on a</p> <p>4 shoot - and it's not funny, but Jeff - but it is in a</p> <p>5 way - they were in a motor home on location at the</p> <p>6 shoot, and they started to drive off and one of the</p> <p>7 models asked to use the restroom and they told her</p> <p>8 which door it was and she went out the side door, so</p> <p>9 grabbed the wrong door, but that's actually the only</p> <p>10 thing that sticks in mind - was that one.</p> <p>11 Q. Have you ever done any research on Jean Luc</p> <p>12 Brunel?</p> <p>13 A. No.</p> <p>14 Q. Do you have any idea that he's known</p> <p>15 throughout Europe as somebody who has sex with underage</p> <p>16 girls?</p> <p>17 A. No.</p> <p>18 Q. You didn't know that until right now?</p> <p>19 A. Correct.</p> <p>20 Q. That's something that you're learning as a</p> <p>21 surprise to you.</p> <p>22 A. Yes.</p> <p>23 Q. So [REDACTED] - somebody you never heard</p> <p>24 of?</p> <p>25 A. It sounds familiar. I'm trying to place</p>
<p style="text-align: center;">110</p> <p>1 A. Just every once in a while he would say</p> <p>2 something about, you know, one of the model shoots or</p> <p>3 something. We normally had him on - we would take</p> <p>4 him back and forth to Paris.</p> <p>5 Q. Where some of their models come from?</p> <p>6 A. I don't know.</p> <p>7 Q. Did you ever bring some of the Paris models</p> <p>8 back?</p> <p>9 A. Not that I'm aware of, no.</p> <p>10 MR. PIKE: Form.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. So he would go to Paris on the airplane, Jean</p> <p>13 Luc, would you drop him off there or would you pick</p> <p>14 people up and bring them back?</p> <p>15 A. If I remember, normally we were bringing</p> <p>16 Jean Luc from Paris to New York, if I remember.</p> <p>17 Q. And when you say that the modeling agency -</p> <p>18 obviously that, you know, between him and Mr. Epstein -</p> <p>19 is that something that Mr. Epstein would talk to you</p> <p>20 about or is that something that Jean Luc would talk to</p> <p>21 you about or you would just overhear the two?</p> <p>22 A. Overhear the two, or Jean Luc may say</p> <p>23 something about one of the shoots or something, just</p> <p>24 in general conversation.</p> <p>25 Q. And what would Jeffrey's comment be about some</p>	<p style="text-align: center;">112</p> <p>1 her. I don't know if she works in the office or --</p> <p>2 Q. Or worked in the office?</p> <p>3 A. Worked in the office, yeah. I very rarely</p> <p>4 went to the office. I mean --</p> <p>5 Q. [REDACTED] - how do you know her?</p> <p>6 A. From the flights - being on the airplane.</p> <p>7 Q. How many times was she on the airplane?</p> <p>8 A. Quite a few. Almost every.</p> <p>9 Q. What's your understanding as to what she did</p> <p>10 for Mr. Epstein?</p> <p>11 A. [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 Q. Did Mr. Epstein ever once mention to you that</p> <p>16 he likes massages?</p> <p>17 MR. PIKE: Form.</p> <p>18 A. No, he never mentioned that to me.</p> <p>19 Q. That's not something that you ever heard of,</p> <p>20 right?</p> <p>21 A. Well, I --</p> <p>22 Q. I mean, outside of the articles that you've</p> <p>23 read.</p> <p>24 A. Right. No, but he never came up to me and</p> <p>25 said, "I like massages."</p>



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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 [REDACTED] right, in these --
 21 A. No. [REDACTED] - I don't remember [REDACTED] coming
 22 into the picture until later.
 23 Q. Later in [REDACTED]-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. [REDACTED]
 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 [REDACTED], 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. [REDACTED]
 15 [REDACTED] 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. [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 Q. [REDACTED]



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1 [REDACTED]
 2 [REDACTED]
 3 Q. Do you know where she came from?
 4 A. Just what I've read in the paper - [REDACTED]
 5 [REDACTED] I'm sorry, I don't remember the
 6 country.
 7 Q. Were you ever told that Mr. Epstein [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 Q. Did you ever see him and her sexually involved
 14 on the airplane or otherwise?
 15 A. No.
 16 Q. Did you ever see Epstein involved sexually
 17 with anybody on the airplane?
 18 A. No.
 19 Q. Did you ever see the airplane used for sexual
 20 purposes?
 21 A. No.
 22 MR. PIKE: Form.
 23 BY MR. EDWARDS:
 24 Q. If it had happened - considering the various
 25 areas that were cordoned off or blocked off - would that

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1 have even been something that you could have seen?
 2 A. No, no, if it was - if the doors were
 3 closed, no.
 4 Q. So there's a back room that you've described
 5 that has a bed in it, and if that door's closed you don't
 6 know what's going on behind closed doors, right?
 7 A. That's correct.
 8 MR. PIKE: Form.
 9 BY MR. EDWARDS:
 10 Q. Do you remember a time Epstein was back in
 11 that back room with other people?
 12 MR. PIKE: Form.
 13 A. No.
 14 Q. Are you saying it never happened while you
 15 were on the airplane?
 16 A. I really have no idea of knowing because,
 17 one, we never go back there unless we're invited
 18 back.
 19 Q. Okay.
 20 A. And the forward door - the very forward
 21 salon door is closed, so we never even normally go
 22 into that --
 23 Q. So you don't really know --
 24 A. -- without permission.
 25 Q. You don't really know what happens --

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1 A. No.
 2 Q. -- in the back of the airplane.
 3 A. No.
 4 Q. So anything could go on. You would have no
 5 idea.
 6 MR. PIKE: Form.
 7 BY MR. EDWARDS:
 8 Q. You could sit here and testify truthfully, "I
 9 have no clue what's going on back there."
 10 A. That's correct. That's correct.
 11 Q. Darren Indyke - what's your understanding as
 12 to his involvement with Mr. Epstein?
 13 A. An attorney for the company.
 14 Q. Ever met Alan Dershowitz?
 15 A. I think -- Yes.
 16 Q. How did you meet him?
 17 A. Alan Dershowitz. I don't know if it was
 18 Mr. Goldberger or Alan Dershowitz. We brought some
 19 attorneys down --
 20 Q. Why?
 21 A. -- to Florida one time.
 22 Q. Why?
 23 A. For Mr. Epstein. It was right before I
 24 finished flying. For Mr. Epstein to make an
 25 appearance at the courthouse or a meeting or

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1 something, and we brought some attorneys with him.
 2 Q. And were you aware then of the allegations
 3 against Mr. Epstein?
 4 A. They were starting to brew, yes.
 5 Q. Were you still actively working on his payroll
 6 at the time when the investigation was going on?
 7 A. Yes, when it just started.
 8 Q. And did that impact you in any way as to
 9 whether or not you wanted to be affiliated with this
 10 person?
 11 A. Subconsciously, it may have. And it
 12 wasn't because of this person, but as a business
 13 decision, if, you know, an airplane's not needed and
 14 I don't fly, I could be out of work. But, no, the
 15 primary reason was the fact that I did want to get
 16 off the road and back home.
 17 Q. [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 Q. I'm assuming you're aware of the factual
 23 allegations in these complaints?
 24 A. Yes, yes.
 25 Q. And you are aware that there are hundreds of



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<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.
 2 Q. Is that a time Chris Tucker --
 3 A. Yes.
 4 Q. -- and Kevin Spacey were also on it?
 5 A. Yes.
 6 Q. In addition to the people that we've named,
 7 were there females on that airplane?
 8 A. Yes.
 9 Q. And who were the females that were on the
 10 airplane?
 11 A. Can't remember. Ms. Maxwell, [REDACTED], I can
 12 remember, and a couple others, and there's - Mr.
 13 Clinton had - a couple of his support staff were
 14 women also.
 15 Q. Where were you sitting during these trips?
 16 A. Up front in the - my station.
 17 Q. Could you see what they were doing where you
 18 were?
 19 A. No, no.
 20 Q. Could you tell if there was any sex going on
 21 on the airplane while you were on it?
 22 A. No.
 23 MR. PIKE: Form.
 24 BY MR. EDWARDS:
 25 Q. Do you know of any underage girls being on

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1 that airplane or would you have been able to tell?
 2 A. No.
 3 MR. REINHART: I'm sorry --
 4 MR. PIKE: Asked and answered.
 5 MR. REINHART: -- are you limiting it to
 6 that trip?
 7 BY MR. EDWARDS:
 8 Q. To that trip.
 9 A. No, I'm not aware of it.
 10 Q. If you had been aware of underage girls being
 11 transported on the airplane for the purposes of sex,
 12 would you have said something to somebody?
 13 A. Yes.
 14 MR. PIKE: Form.
 15 MR. EDWARDS: Do you mind if we take a
 16 five-minute break? I just have to run to the
 17 bathroom.
 18 MR. PIKE: Actually, Brad, can you hear
 19 me?
 20 MR. EDWARDS: Yes.
 21 MR. PIKE: How much longer do you
 22 anticipate going with this witness?
 23 MR. EDWARDS: Hour, maybe a little longer.
 24 MR. PIKE: Well, are you going to take a
 25 lunch break or what?

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1 MR. EDWARDS: No. I mean, unless
 2 everybody wants to take a lunch break.
 3 Everybody's shaking their heads, so, no, I'm
 4 going to take a bathroom break, and it's going
 5 to be a fast one.
 6 MR. PIKE: Okay.
 7 BY MR. EDWARDS:
 8 Q. In 2001, when you're on this flight to New
 9 York and then during that year we talked a little bit
 10 about it, is Larry Visoski and David Rodgers also on some
 11 of these flights?
 12 A. Most, yes.
 13 Q. If somebody's going to keep passenger logs,
 14 who's going to write down the names of the people? Is
 15 that going to be you or is that somebody else's
 16 responsibility?
 17 A. Whoever is captain.
 18 Q. So normally it's Visoski or David Rodgers?
 19 A. Correct.
 20 Q. Who do you turn these logs into?
 21 MR. PIKE: Form.
 22 A. I don't know. I don't know where they go.
 23 Q. You don't know the purpose behind keeping them
 24 or anything?
 25 A. No.

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1 Q. As far as you're concerned, you don't even
 2 need to keep them.
 3 A. Correct. Yeah.
 4 Q. As just due diligence - going above and
 5 beyond?
 6 A. Correct.
 7 Q. Today you have an attorney sitting right next
 8 to you, right?
 9 A. Correct.
 10 Q. Is that somebody that you've known for a long
 11 time?
 12 A. No.
 13 Q. You're paying for an attorney to sit here with
 14 you?
 15 A. No.
 16 Q. Who's paying for your attorney?
 17 A. Mr. Epstein.
 18 Q. Are you worried that you're criminally
 19 involved here or something? Is that why you need an
 20 attorney?
 21 A. No. I don't even know anything about this
 22 process, that's --
 23 Q. Oh, okay.
 24 A. I'm just -- You know.
 25 Q. How did you know that you were --



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



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1 Q. Yes.

2 A. No.

3 Q. So if somebody has given testimony other than

4 that, you would say that person is mistaken or lying?

5 MR. PIKE: Form.

6 A. Donald Trump was never on the airplane

7 when I was on the airplane.

8 Q. Is it your understanding that Donald Trump is

9 friends with Mr. Epstein?

10 A. From what I've read - or associates. I

11 don't know how that circle works.

12 Q. What's your understanding as to who Mr.

13 Epstein's real friends are?

14 A. I really don't know. I don't -- I don't

15 know. It's -- It's not like the Wexners where, you

16 know, they were high school associates, you know,

17 growing up.

18 Q. Do you know what Mr. Epstein did prior to

19 managing the money for Mr. Wexner?

20 A. Just that he was a Wall Street broker or

21 somebody, you know.

22 Q. Also from reading?

23 A. Yes, yes.

24 Q. Do you know any personal knowledge as to what

25 Mr. Epstein has told you about how he made money?

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1 A. He's never --

2 MR. PIKE: I'm going to move to strike any

3 responses relative to what the witness has

4 learned from reading.

5 BY MR. EDWARDS:

6 Q. And so that is why I asked the question: Has

7 Mr. Epstein told you? Which would have nothing to do

8 with reading.

9 A. No.

10 Q. How many conversations have you personally had

11 with Mr. Epstein?

12 A. No personal conversations - all business.

13 Q. Have you witnessed Mr. Epstein with any girls

14 that look to be under the age of 18?

15 A. No.

16 Q. Have you witnessed Mr. Epstein with

17 young-looking girls that appear to be in their twenties?

18 MR. PIKE: Form.

19 A. Yes.

20 Q. On how many occasions?

21 A. Probably several.

22 Q. And how did that come about?

23 A. I mean, they show up and ride on the

24 airplane, you know.

25 Q. And who are they, if you know?

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1 A. I have no idea. I don't know.

2 Q. When you say that [REDACTED] was just

3 coming in the picture, what's your understanding as to

4 who [REDACTED] is relative to Mr. Epstein?

5 A. I don't know. I don't understand. I

6 don't know. I didn't know if maybe she was like an

7 exchange -- Jeffrey always appeared to be very

8 involved in education and philanthropy. I didn't

9 know if she was an exchange-type student or something

10 or what. I don't know.

11 Q. When you say he appeared to be "involved in,"

12 what do you mean?

13 A. Educational things, foundations, science

14 foundations, and things.

15 Q. Speaking of - the Florida Science Foundation

16 is a place where, when he was on work release, he spent a

17 lot of time there, you're aware of that?

18 A. That's what I've heard, yeah.

19 Q. What does that place do?

20 A. I have no idea.

21 Q. Does it do anything?

22 A. I don't know. I don't know anything about

23 it.

24 Q. Certainly you've read certain newspaper

25 articles about the allegations, police reports,

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1 otherwise, the allegations that occurred or have been

2 alleged to have occurred at his Palm Beach mansion,

3 correct?

4 A. Uh-huh.

5 Q. Correct?

6 A. Correct.

7 Q. Given the nature of those allegations, would

8 you leave [REDACTED] with Mr.

9 Epstein alone?

10 MR. PIKE: Form. Move to strike.

11 A. Yes.

12 Q. You would?

13 A. (Witness nods head.)

14 Q. And why?

15 A. Because I don't fear that he would try

16 anything with [REDACTED]. He showed -- When I

17 worked for him he showed me respect. He never -- I

18 never -- He never showed me disrespect. He would ask

19 how the family is. I mean, not on a personal level,

20 but an employer/employee.

21 Q. Right. Okay.

22 A. He never showed me any reason not to trust

23 him.

24 Q. But you're not a 13-year old girl, so.

25 A. No, but, like I say, he never showed me



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<p style="text-align: center;">137</p> <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 style="text-align: center;">139</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>
<p style="text-align: center;">138</p> <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 [REDACTED]. 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] and [REDACTED] - [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 style="text-align: center;">140</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>



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1 President Clinton was on the plane?
 2 MR. REINHART: Asked and answered.
 3 A. Yeah, I don't remember for sure. There
 4 was probably maybe five, if that, and that's --
 5 Q. What were they --
 6 A. What?
 7 Q. Go ahead.
 8 A. Like I say, it was Ms. Maxwell, [REDACTED],
 9 maybe two others, one other, and then I think Mr.
 10 Clinton had two ladies in his entourage - support
 11 staff.
 12 Q. What age group are we talking about with the
 13 ladies that were on the airplane?
 14 MR. PIKE: Form.
 15 A. Mid-twenties to forties, maybe. I mean, I
 16 don't know exactly.
 17 Q. I mean, you know what a 13 or 14-year-old girl
 18 looks like --
 19 A. Yes.
 20 Q. -- right?
 21 A. Yes.
 22 Q. Most people do.
 23 A. Yes.
 24 Q. You wouldn't mistake a 13 or 14 or 15 year old
 25 for a 20 year old.

142

1 A. No, no.
 2 MR. PIKE: Form.
 3 BY MR. EDWARDS:
 4 Q. So you're sure that the people that were on
 5 the airplane - they were above the age of 18?
 6 A. I believe so.
 7 Q. Because you, in your experience, as well as
 8 the experience of most people your age, would know --
 9 A. Right.
 10 Q. -- what a 14 or 15 year old looks like.
 11 A. Right.
 12 Q. I'm going to go through the next flight log.
 13 You tell me what we're looking at here. Who's on the
 14 airplane?
 15 A. That was a deadhead. Nobody's on it.
 16 Q. Why were the names crossed out?
 17 A. Because there was no passengers. This was
 18 - origin was West Palm Beach - West Palm Beach. What
 19 date is this? 1/20/04? It was probably a test
 20 flight.
 21 Q. Okay.
 22 A. It was a training flight --
 23 Q. Okay.
 24 A. -- for Bill.
 25 Q. The next one -- Well, before I ask this: Were

143

1 you familiar with a flight where Prince Andrew was on the
 2 airplane?
 3 A. I don't know if I remember him being on
 4 the airplane or not. I know that he has been on the
 5 airplane or one of the airplanes. I can't say for
 6 sure.
 7 Q. Have you met him before?
 8 A. I can't remember, honestly. I know.
 9 Q. Can't remember meeting Prince Andrew?
 10 A. I know. I know. I didn't even know who
 11 he was when I first heard the name, sorry. But, no,
 12 I can't remember for sure, I'm sorry.
 13 Q. That's like if E.T. walked on the airplane and
 14 I don't know.
 15 A. I know. Well --
 16 Q. Alright. I'll let you slide on that one. You
 17 know who Prince Andrew is now.
 18 A. Okay. Don't paint me as stupid. One of
 19 Lady Di's sons, right?
 20 Q. I mean, you know what he looks like now.
 21 A. You know, honestly, I don't know if I
 22 could point him out to you, I'm sorry.
 23 Q. Alright.
 24 A. It's just --
 25 Q. We'll forget him.

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1 A. I'm smart in some things.
 2 Q. We'll forget him. We'll forget him. Don't
 3 worry about it.
 4 What's this? What are we looking at?
 5 MR. REINHART: For the record, you handed
 6 him a manifest dated [REDACTED]; is that
 7 correct?
 8 THE WITNESS: January -- Yes. Correct.
 9 Palm Beach to Kennedy, same thing, fuel
 10 burns, loads, destination, time off, time on.
 11 Next, it was trip 312. Jeffrey is on it, [REDACTED],
 12 David Mullen, [REDACTED], [REDACTED], Todd Myster (sic),
 13 and passenger, passenger.
 14 BY MR. EDWARDS:
 15 Q. Do you know Todd Meister?
 16 A. He's a friend of his, I believe.
 17 Q. Father's Bob Meister? Do you know the names?
 18 A. No, I don't know that.
 19 Q. How do you know Todd Meister?
 20 A. I've just heard the name.
 21 Q. From who?
 22 A. Larry Visoski.
 23 Q. Larry Visoski knows these people?
 24 A. I think Todd Meister has an airplane, or
 25 something like that. He's talked to their flight



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1 crew.

2 Q. For the most part, when you mention these

3 people's names, you mention them as if they're just

4 passengers on the airplane and this is their world -

5 you're passing through, you don't know them.

6 A. Right.

7 Q. But Visoski - would you say that he has a

8 closer relationship with Epstein to where he might know

9 some of these people?

10 MR. PIKE: Form.

11 A. That could be an accurate - yeah. I mean,

12 he's been with Jeffrey longer. I mean --

13 Q. I mean, do you know that Visoski has a car

14 that is registered in Jeffrey Epstein's name? You don't

15 have anything like that, do you?

16 A. No, I did not.

17 Q. Were you aware of that?

18 A. No.

19 Q. Does Mr. Visoski tell you how far he goes back

20 with Jeffrey Epstein?

21 A. No, just, I mean, when he hired him,

22 whenever that was after Glimcher - that's all I know.

23 Q. Do you know anything about Visoski's private

24 life?

25 A. A little bit. He's married and -

146

1 daughters. I mean --

2 Q. Then I won't go into the rest of his private

3 life.

4 When it says, "1 pay, 1 pay," what does that

5 mean?

6 A. It's "PAX." P-A-X is short for

7 "passenger." It's a brief.

8 Q. Okay. Look, this is somebody that is listing

9 names of people on an airplane. They're going out of

10 their way --

11 A. Right.

12 Q. -- and then all of a sudden on No. 8 and 9

13 they say, "one passenger." Is this person just getting

14 lazy or is there a reason why there's no name?

15 A. Like I say, just getting lazy and then

16 didn't know who the passenger was.

17 Q. Well, they obviously didn't know who Todd

18 Meister was either - they wrote his name all wrong.

19 A. They did?

20 MR. PIKE: Form.

21 BY MR. EDWARDS:

22 Q. Well, "Meister" is not spelled like that, so

23 how did --

24 A. I didn't -- I didn't know that. I don't

25 know how he -- How does he spell it?

147

1 Q. Well, do you know whose handwriting that is?

2 A. No, no, I don't. It may be Larry's.

3 Q. Similar handwriting --

4 A. Wait a minute.

5 Q. -- as those --

6 A. Let's see the one with the training -

7 because there's a different pilot on there.

8 Q. Right. One where there is nobody on it,

9 right?

10 A. This is Bill's -- I can't -- This is

11 Bill's writing. I think he was having him fill out

12 the paperwork.

13 Q. Bill Hammond?

14 A. Yeah, this was his training flight.

15 Q. The first one is Visoski?

16 A. Maybe. I can't say for sure. I really

17 can't say for sure.

18 Q. And this is?

19 A. I don't know if that's the same

20 handwriting or not.

21 Q. Well, is there any indication up here that

22 would tell us whose handwriting it is? David Rodgers and

23 Larry Visoski --

24 A. No, because this is --

25 Q. -- are the pilots.

148

1 A. Yeah, but they don't indicate - they don't

2 indicate who's captain that day. You know, I'm not a

3 handwriting expert. I can't really -- Honestly, I

4 can't tell you for sure whose handwriting it was.

5 Q. Let's keep this one out, and tell me if this

6 is -- I'm going to hand you [REDACTED] --

7 MR. REINHART: [REDACTED]

8 MR. EDWARDS: [REDACTED]

9 MR. REINHART: Yes.

10 BY MR. EDWARDS:

11 Q. -- [REDACTED], so two days later - where

12 is this airplane going?

13 A. From Kennedy to Palm Beach.

14 Q. And so this is Palm Beach to Kennedy --

15 A. Yep.

16 Q. -- in this exhibit. The next one is Kennedy

17 to Palm Beach.

18 A. Correct.

19 Q. They come back. Where do they stay - do you

20 know?

21 A. What do you mean?

22 Q. Well, they get off on the [REDACTED] they stay

23 somewhere until they come back on the [REDACTED] Do you know

24 where they stay?

25 MR. REINHART: Can we clarify who "they"



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1 is?

2 BY MR. EDWARDS:

3 Q. I guess it is: David Mullen, [REDACTED]

4 [REDACTED], Tod Myster (sic), 1 pax, another pax,

5 [REDACTED] and Jeffrey Epstein - and there's a crossed

6 out "Ghislaina 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

150

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] 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.

151

1 Q. The next one is [REDACTED], 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?

152

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 [REDACTED] - who's on the passenger

9 list?

10 A. Jeffrey, [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 [REDACTED].

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. [REDACTED] - who's on there?

154

1 A. Jeffrey, [REDACTED], [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 [REDACTED].

25 Q. That's Michael Pike not wanting me to know

155

1 what it says.

2 A. It's -- I think it's a [REDACTED].

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?

156

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.



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1 A. Okay.

2 Q. No different names.

3 MR. REINHART: Can we just get the date on

4 the record?

5 BY MR. EDWARDS:

6 Q. Well, actually, we don't have to skip it.

7 [REDACTED] - that's the date, right?

8 A. Right.

9 Q. And it says: Ghislaine Maxwell --

10 A. Okay.

11 Q. -- [REDACTED], [REDACTED], and [REDACTED]

12 (sic); is that right?

13 A. That's what it says.

14 Q. Is that a typical crew that you would see on

15 the plane?

16 A. What year is this? In [REDACTED]?

17 Q. Yes.

18 A. Yes, but towards the end there, I think

19 the last year, I only saw Ms. Maxwell once.

20 Q. Do you know of any falling out of sorts that

21 Ghislaine Maxwell and Epstein had?

22 A. Well, no. I think they still -- I think

23 she still has a lot of association, or whatever.

24 Q. Do you think they are still a couple?

25 A. I don't know that they ever were. I never

158

1 did figure out the relationship, other than I assumed

2 they were a couple and she was a business assistant -

3 associate, but that was all assumption.

4 Q. Did you ever know of Jeffrey Epstein to have a

5 girlfriend, per se?

6 A. If it would have been, it would have been

7 Ms. Maxwell.

8 Q. Other than Ms. Maxwell, could you identify any

9 other female that appeared to be in a intimate

10 relationship with Jeffrey Epstein?

11 A. Not really, not that I - not that I could

12 say it was a relationship, no.

13 Q. I'm going to show you another one. I don't

14 know these people. Tell me who they are. It looks like

15 you're on the airplane --

16 MR. REINHART: Can we get a --

17 Q. -- and the date is [REDACTED]

18 A. Right.

19 Q. [REDACTED]. It's

20 going --

21 A. I don't know who the Stanleys are.

22 Q. And it's going from the island.

23 A. To --

24 Q. Palm Beach.

25 A. -- Palm Beach. I don't know who the

159

1 Stanleys are.

2 Q. Ever heard of them?

3 A. No.

4 Q. As far as you're concerned, they're some

5 islanders or something, right? I mean --

6 A. Well, they might be -- I mean --

7 MR. PIKE: Form.

8 A. -- there's a lot of wealthy people down

9 there. They might have been friends or associates

10 that needed a lift back stateside.

11 Q. Fair enough.

12 What's the next one?

13 A. Teterboro to PBI.

14 Q. And who's on it?

15 A. Jeffrey, [REDACTED], and [REDACTED].

16 MR. REINHART: Can we get a date for the

17 record?

18 THE WITNESS: [REDACTED].

19 BY MR. EDWARDS:

20 Q. It seems like [REDACTED] and [REDACTED] travel a lot

21 with Jeffrey. Is it ever your understanding that Jeffrey

22 Epstein had a sexual relationship with either of them?

23 A. That is not my understanding, no.

24 Q. Do you know of [REDACTED] having a boyfriend

25 ever?

160

1 A. I heard that she has a boyfriend.

2 Q. And what's his name?

3 A. And this is just hearsay. I don't know.

4 Q. I'm interested in hearsay.

5 A. I heard that she's dating somebody -

6 that's all.

7 Q. Dating whom?

8 A. [REDACTED]

9 Q. [REDACTED] (phonetic)?

10 A. I don't know his last name.

11 Q. How long has she been dating him?

12 A. I don't know. This is just Larry, you

13 know, every once in a while asks, you know, "What's

14 going on?" "Who's" -- You know, I don't know.

15 Q. Where does [REDACTED] live?

16 A. [REDACTED]

17 [REDACTED]

18 Q. And [REDACTED] is somebody who you heard of through

19 Larry Visoski?

20 A. Yes, yes.

21 Q. And specifically what did Larry Visoski say

22 about [REDACTED]

23 A. He thought that they were dating - he and

24 [REDACTED] - and this is all hearsay.

25 Q. Since when?



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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 [REDACTED]
 5 [REDACTED], and he is dating
 6 somebody named "[REDACTED]" that it would also be a
 7 fair presumption that [REDACTED] 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, "[REDACTED]"
 17 [REDACTED] - 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. -- [REDACTED] is dating this person and his
 22 name is [REDACTED]
 23 [REDACTED]
 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, [REDACTED] is dating [REDACTED]."
 24 A. Yeah, or - I think he said something about
 25 one of Jeffrey - [REDACTED]

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1 [REDACTED]
 2 Q. And what else does he tell you? I mean, there
 3 are other changes other than, "Hey, [REDACTED] dating
 4 [REDACTED]."
 5 A. A couple of the - couple of long time
 6 people [REDACTED] were laid off.
 7 Q. Such as who?
 8 A. [REDACTED]
 9 Q. [REDACTED]
 10 A. [REDACTED]
 11 Q. [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED] 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 [REDACTED]
 5 [REDACTED]?
 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 [REDACTED] there also?



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<p>1 A. I'm sure at times, yes, 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>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>
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<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>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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<p>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 JEGE 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</p>	<p>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</p>
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<p>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.</p>	<p>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 [REDACTED] 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. [REDACTED] 13 A. [REDACTED] is PBI 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.</p>



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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. [redacted] flight log - who's on it?
 16 A. Jeffrey, Ghislaine Maxwell, David Mullen,
 17 [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 [redacted] 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 [redacted].
 15 Here, just so these are in order, I'll - [redacted].
 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 [REDACTED]. 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 [REDACTED]
 12 [REDACTED]
 13 Q. Used to be Ghislaine Maxwell's [REDACTED]?
 14 A. I believe so, yeah, because [REDACTED] [REDACTED]
 15 [REDACTED]
 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, [REDACTED]
 25 [REDACTED]

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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 [REDACTED]
 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 - PBI 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 [REDACTED].
 10 A. Jeffrey, Ghislaine, and [REDACTED].
 11 Q. Let's see, [REDACTED] and [REDACTED], 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. [REDACTED] - 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



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<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>1 A. Yes, I guess. Yeah. I don't know</p> <p>2 exactly.</p> <p>3 Q. Have you ever heard of [REDACTED] [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>
186	188
<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>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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1 A. No, those are all I know.
 2 Q. You tell me. Who do you know?
 3 A. God, I can't think. It's been so long
 4 ago.
 5 Q. Other than Joe-Joe.
 6 A. Well, Joe-Joe doesn't - he's just a driver
 7 for New York - he and his wife. I could remember
 8 them if I saw their names. I would know which house
 9 they were associated with. I'm terrible with names
 10 anymore, unfortunately. The couple that's now at the
 11 ranch or was at the ranch is at the island helping
 12 manage as an intern.
 13 Q. Who's that?
 14 A. Honestly, I can't remember their names.
 15 If you were to give me a name, I could attach it to
 16 each house.
 17 Q. I wish I could.
 18 A. Yeah, I'm sorry, I can't. It's just --
 19 Q. Do you know [REDACTED]?
 20 A. No. [REDACTED] sounds familiar. I don't
 21 know.
 22 Q. Something to do with the modeling agency?
 23 A. Can't say for sure - can't say.
 24 Q. How about Kalib Shalom?
 25 A. No, never heard of that one.

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1 MR. EDWARDS: Let me look over my notes
 2 real fast. Anybody else going to have some
 3 questions so I can look over my notes and maybe
 4 ask a couple more?
 5 MR. PIKE: Brad, when I get a chance to
 6 cross, I definitely will have some questions for
 7 the witness.
 8 MR. EDWARDS: Okay. Any other plaintiff
 9 attorneys? Kathy? I think Kathy quit on us -
 10 must have been too boring. Anybody else?
 11 Hold on Mike. Give me one minute and then
 12 I think you can shoot.
 13 MS. EZELL: Brad?
 14 MR. EDWARDS: Yes?
 15 MS. EZELL: I'm sorry, it's Kathy. I
 16 didn't realize my mute was on. I do have a few
 17 questions.
 18 MR. EDWARDS: Okay. Go ahead.
 19 CROSS-EXAMINATION
 20 BY MS. EZELL:
 21 Q. Mr. Morrison - forgive me, I didn't write it
 22 down - when did you begin working for Mr. Epstein?
 23 A. January 2001.
 24 Q. Do you remember a young woman named [REDACTED]?
 25 A. No, I'm sorry, I can't - I don't.

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1 Q. Do you remember a young woman named [REDACTED] who
 2 flew frequently with Jeffrey Epstein?
 3 A. No, I don't recall a [REDACTED].
 4 Q. You mentioned a [REDACTED]?
 5 A. A [REDACTED], yes. I remember the name [REDACTED].
 6 Q. Can you describe [REDACTED]?
 7 A. No, I'm sorry, I can't. I just recognize
 8 the name - or the sound of the name.
 9 Q. Do you have any recollection as to what period
 10 of time [REDACTED] flew with Mr. Epstein?
 11 A. It was on one of those Passenger
 12 Manifests. I thought I only saw it one time.
 13 MR. REINHART: Kathy - this is Bruce - the
 14 passenger manifest that had that name on it was
 15 dated [REDACTED].
 16 MS. EZELL: So all of those that Brad went
 17 over were '04 and '05, I believe.
 18 MR. REINHART: Correct.
 19 BY MS. EZELL:
 20 Q. Let's see, did you ever fly Mr. Epstein to St.
 21 Louis?
 22 A. No.
 23 Q. Did you ever fly him to San Francisco?
 24 A. No.
 25 Q. What about France?

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1 A. Yes, Paris.
 2 Q. And Spain?
 3 A. No, nope.
 4 Q. Carmel?
 5 A. Carmel?
 6 MR. REINHART: California, Kathy?
 7 MS. EZELL: Yes.
 8 A. No, we wouldn't have -- Was that Monterey
 9 area?
 10 MR. REINHART: Yes.
 11 A. Yes.
 12 Q. Monterey you did, okay.
 13 Do you remember a woman named [REDACTED] - who would
 14 accompany Elaine (sic) Maxwell?
 15 A. Yes, I remember [REDACTED]. I believe she was
 16 [REDACTED] or --
 17 Q. And what was her function?
 18 A. To the best of my knowledge, [REDACTED]
 19 [REDACTED]
 20 Q. Did there come a point in time where Ms.
 21 Maxwell flew her own plane?
 22 A. No.
 23 Q. Did there come a time that you became aware
 24 that she and Jeffrey Epstein were flying separately?
 25 A. Yes.



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



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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.

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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

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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

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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. [REDACTED]. 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. -- [REDACTED]
 23 [REDACTED]
 24 (Please continue to Volume II.)
 25



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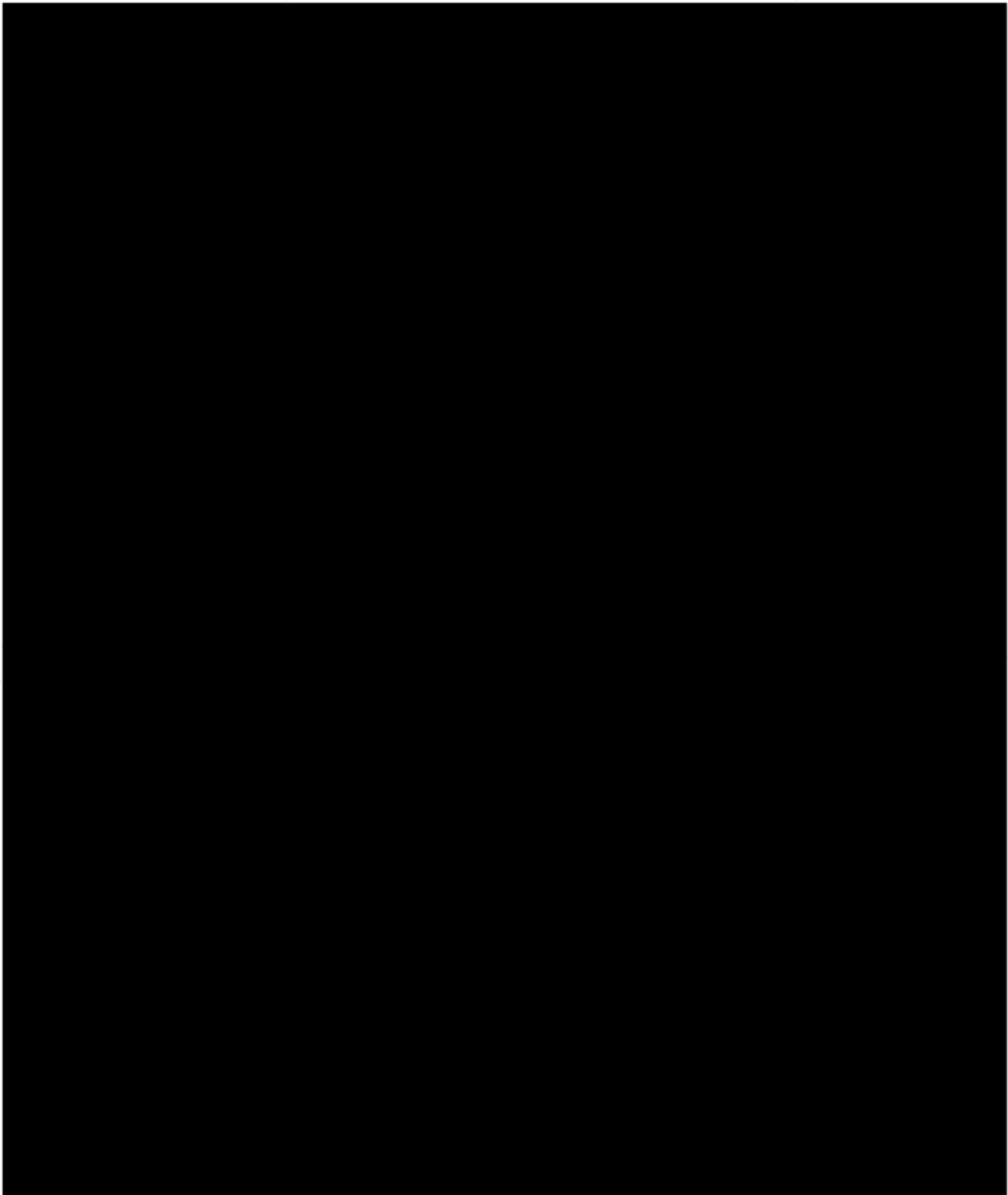
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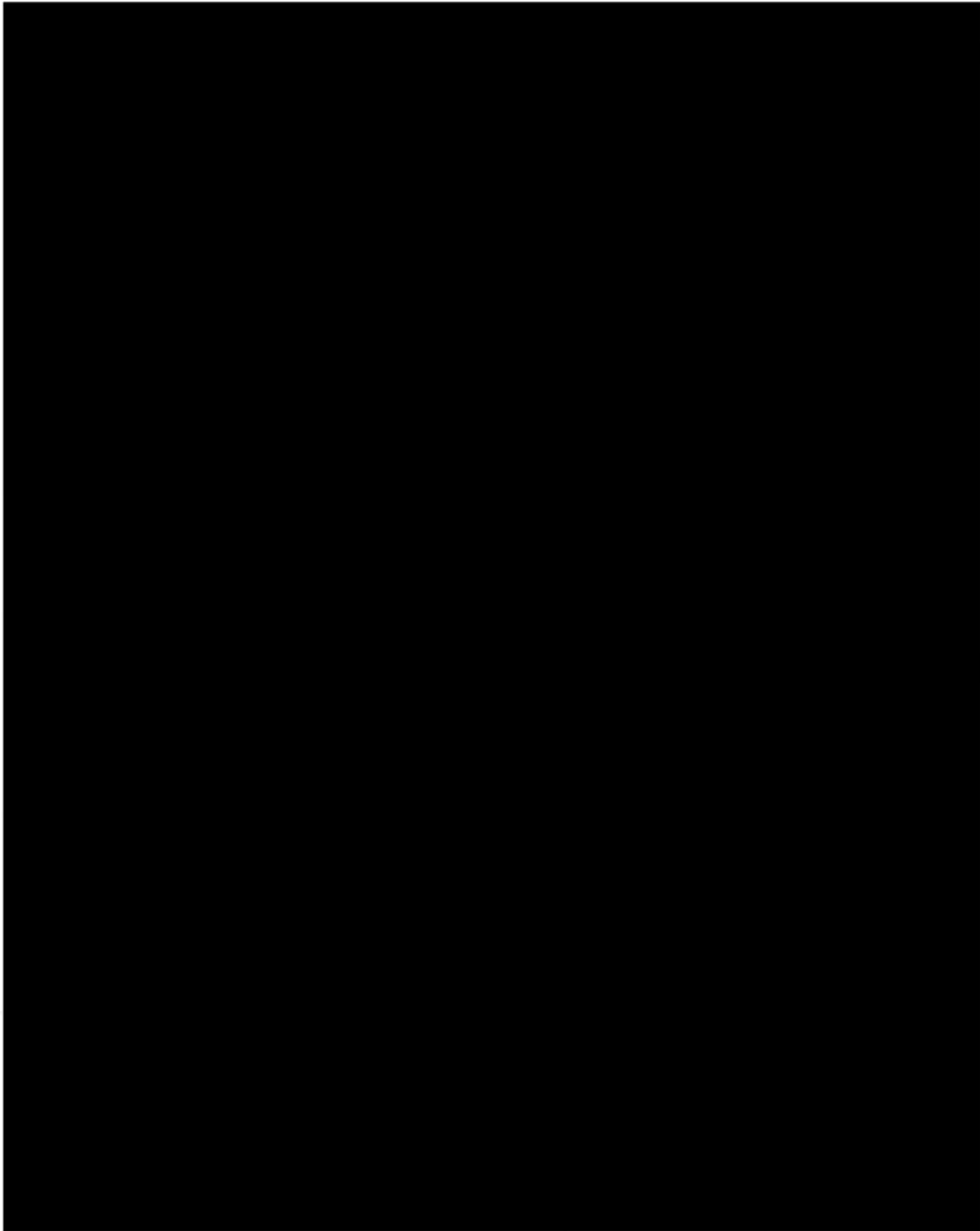
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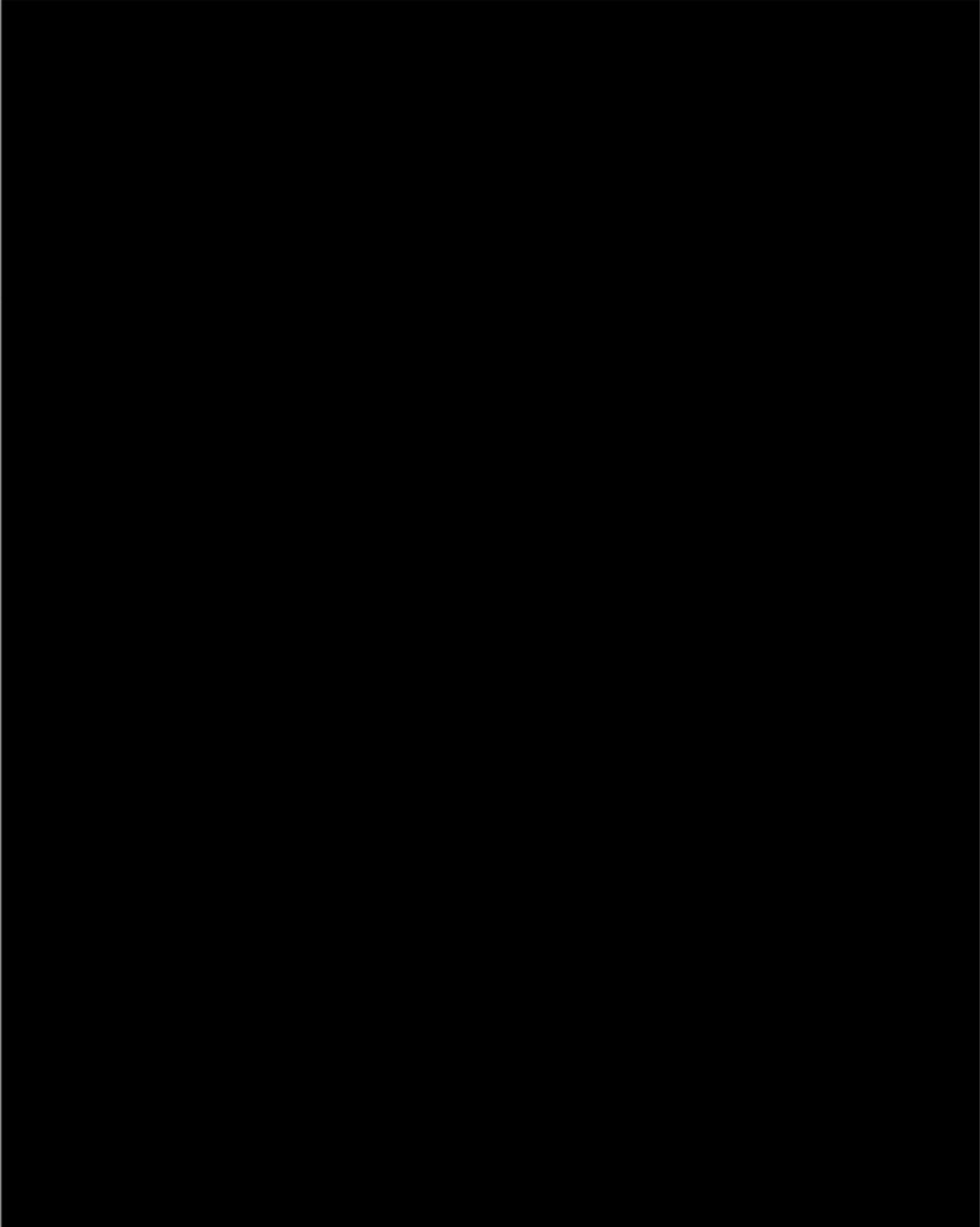
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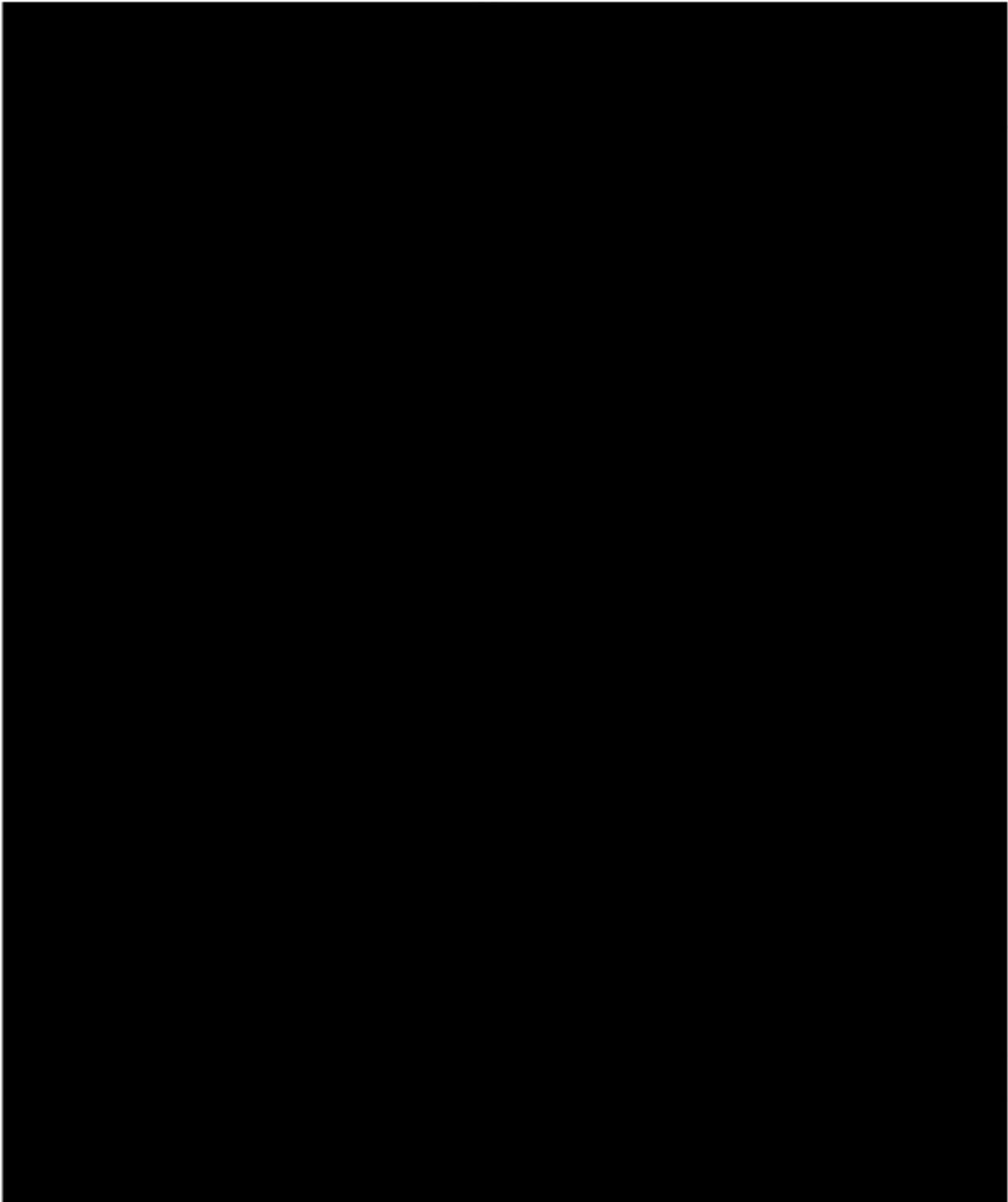
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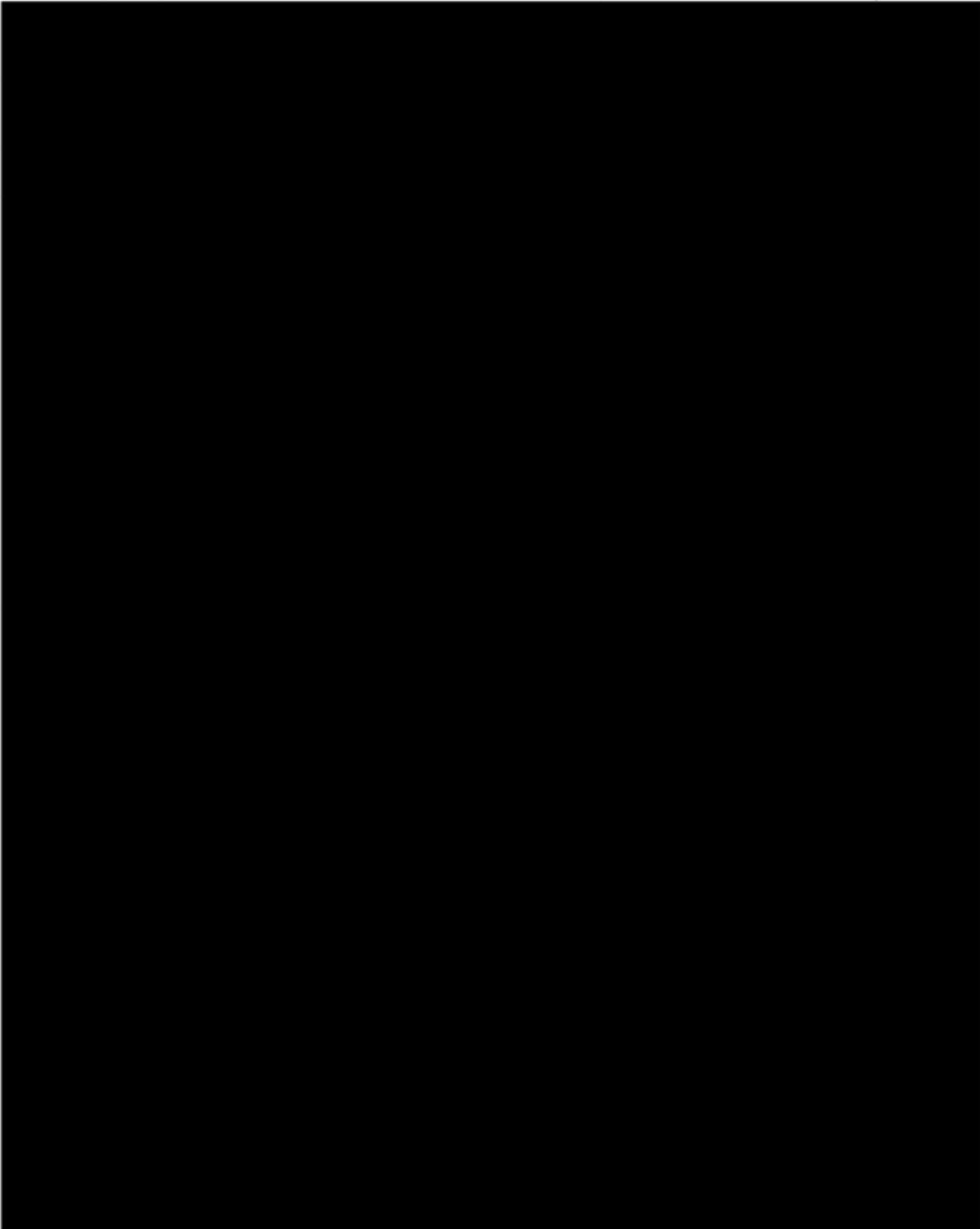
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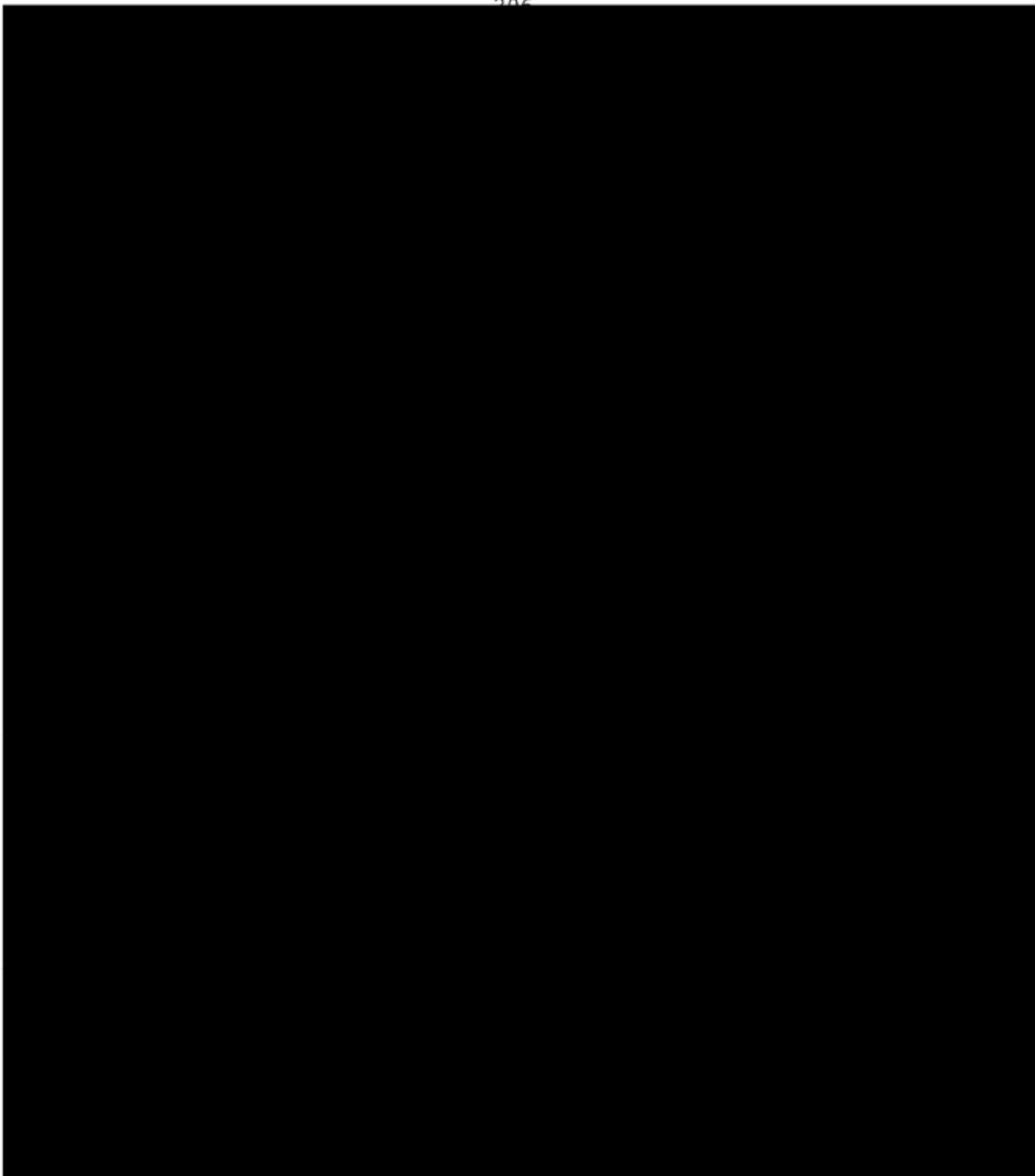
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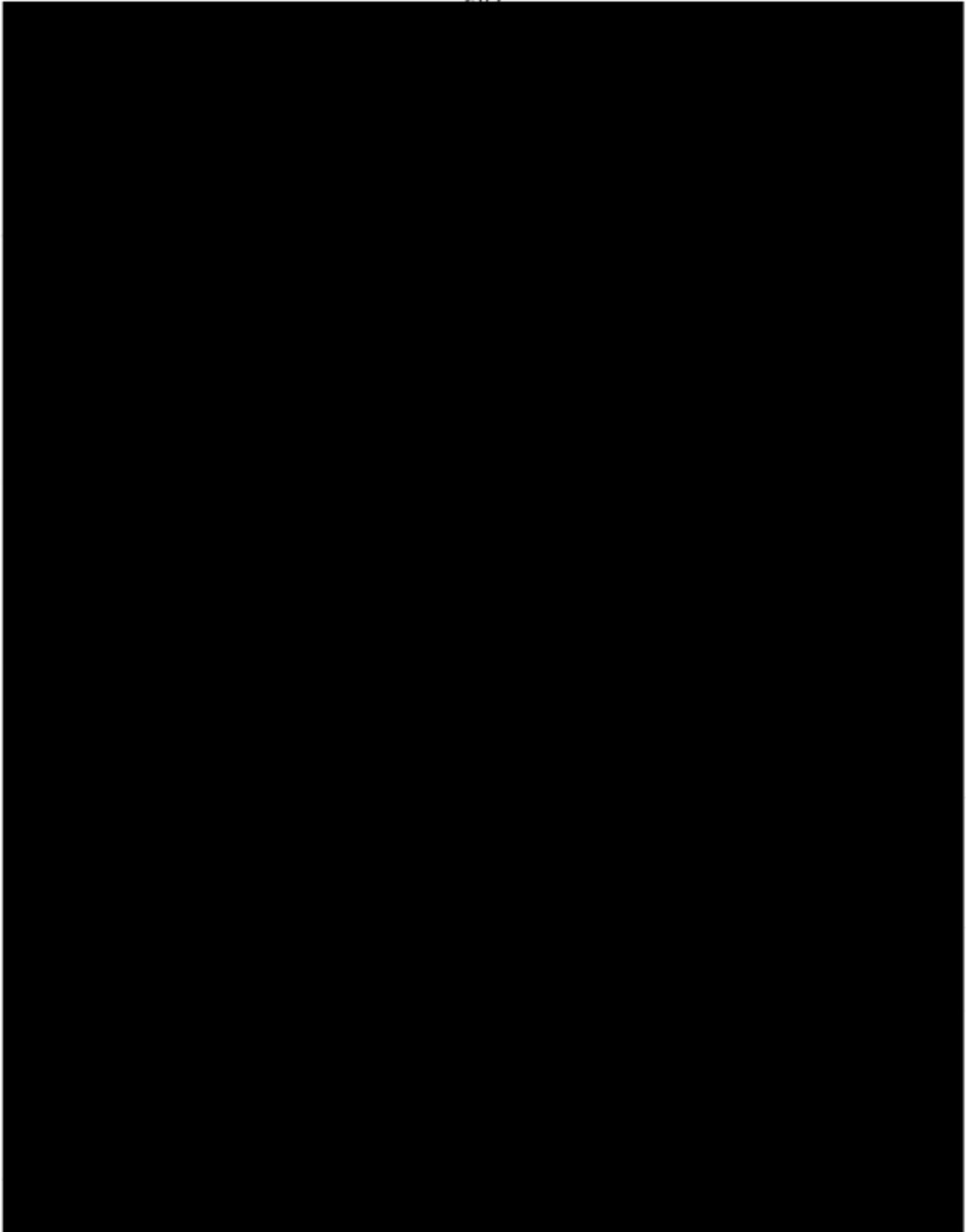
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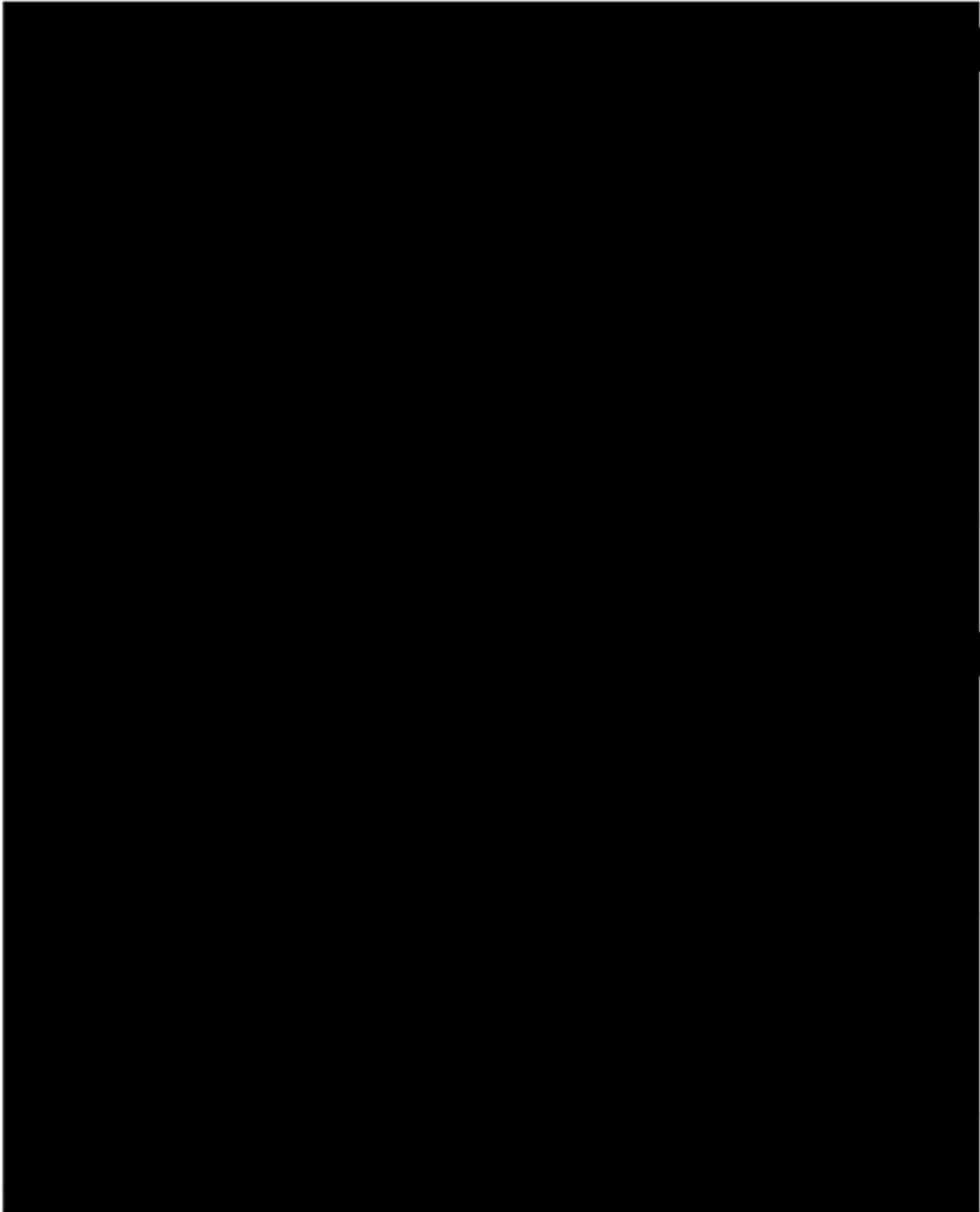
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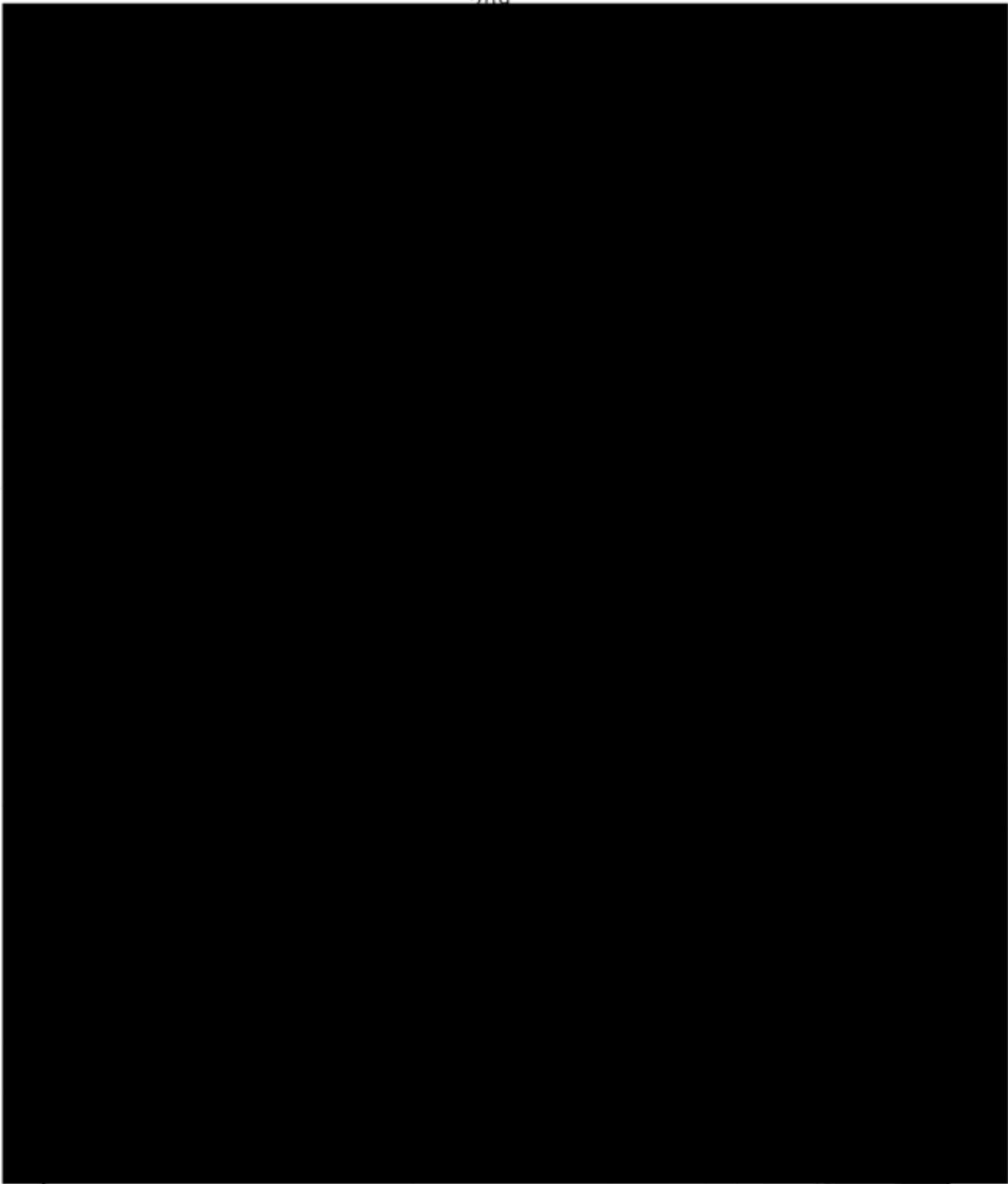
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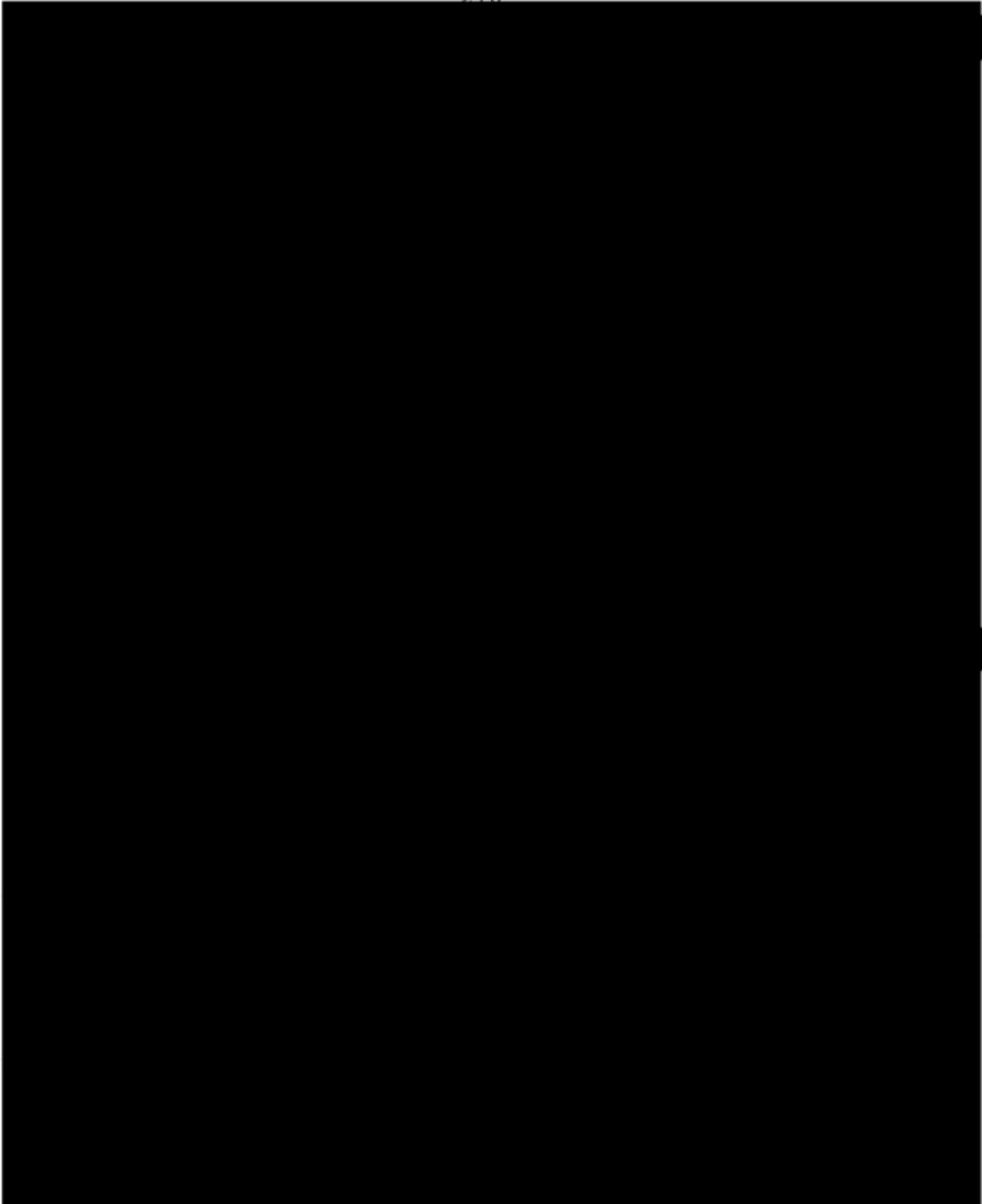
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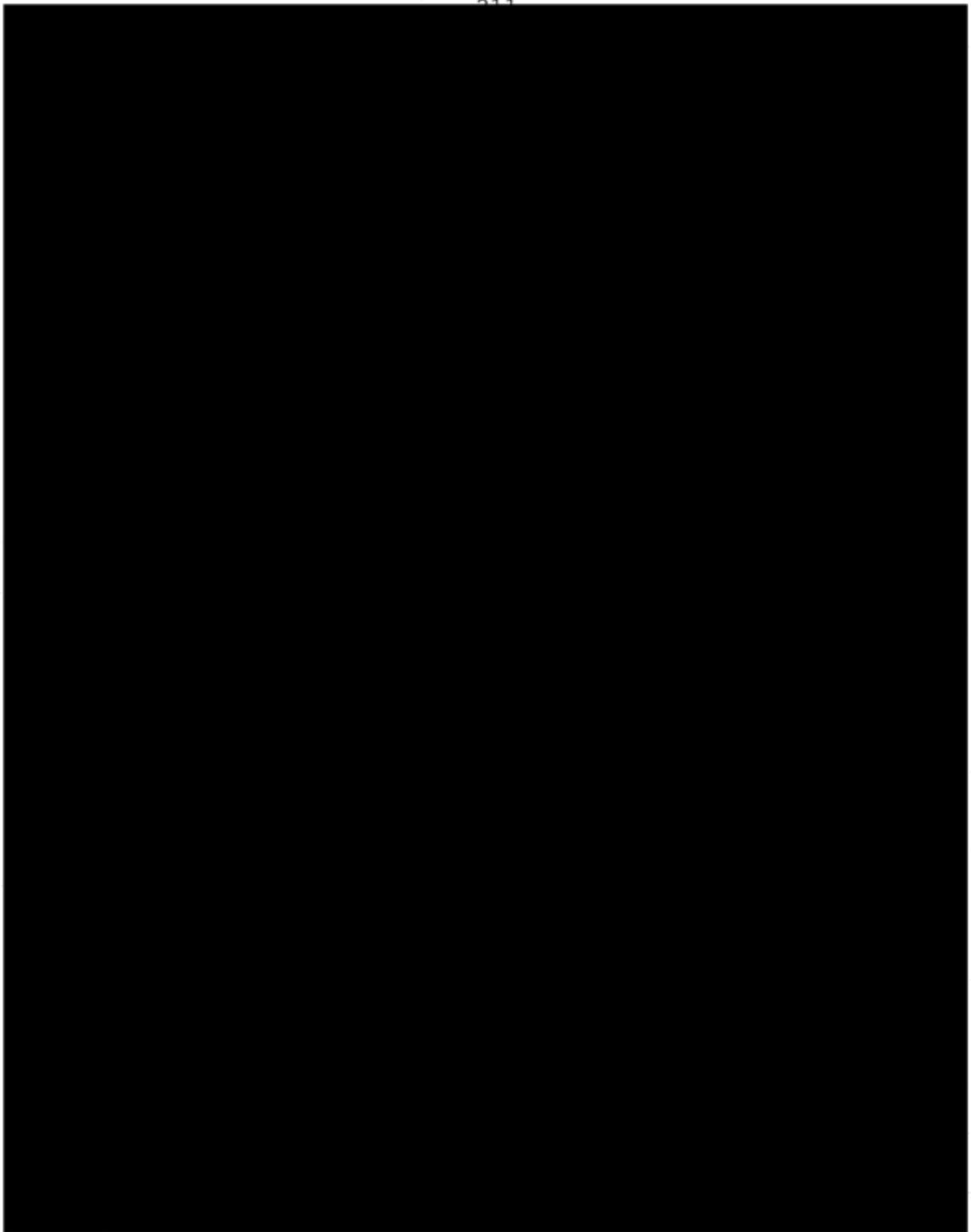
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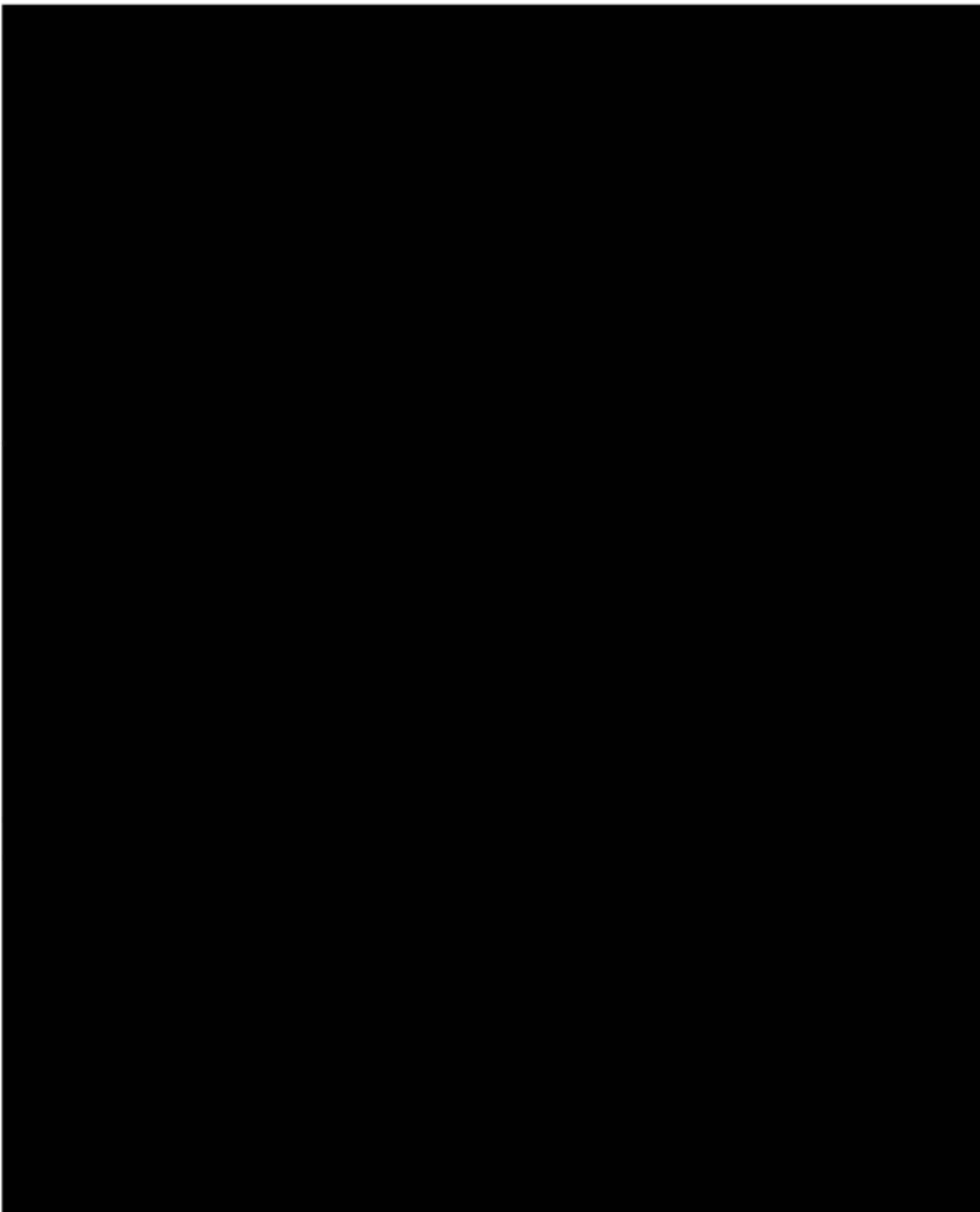
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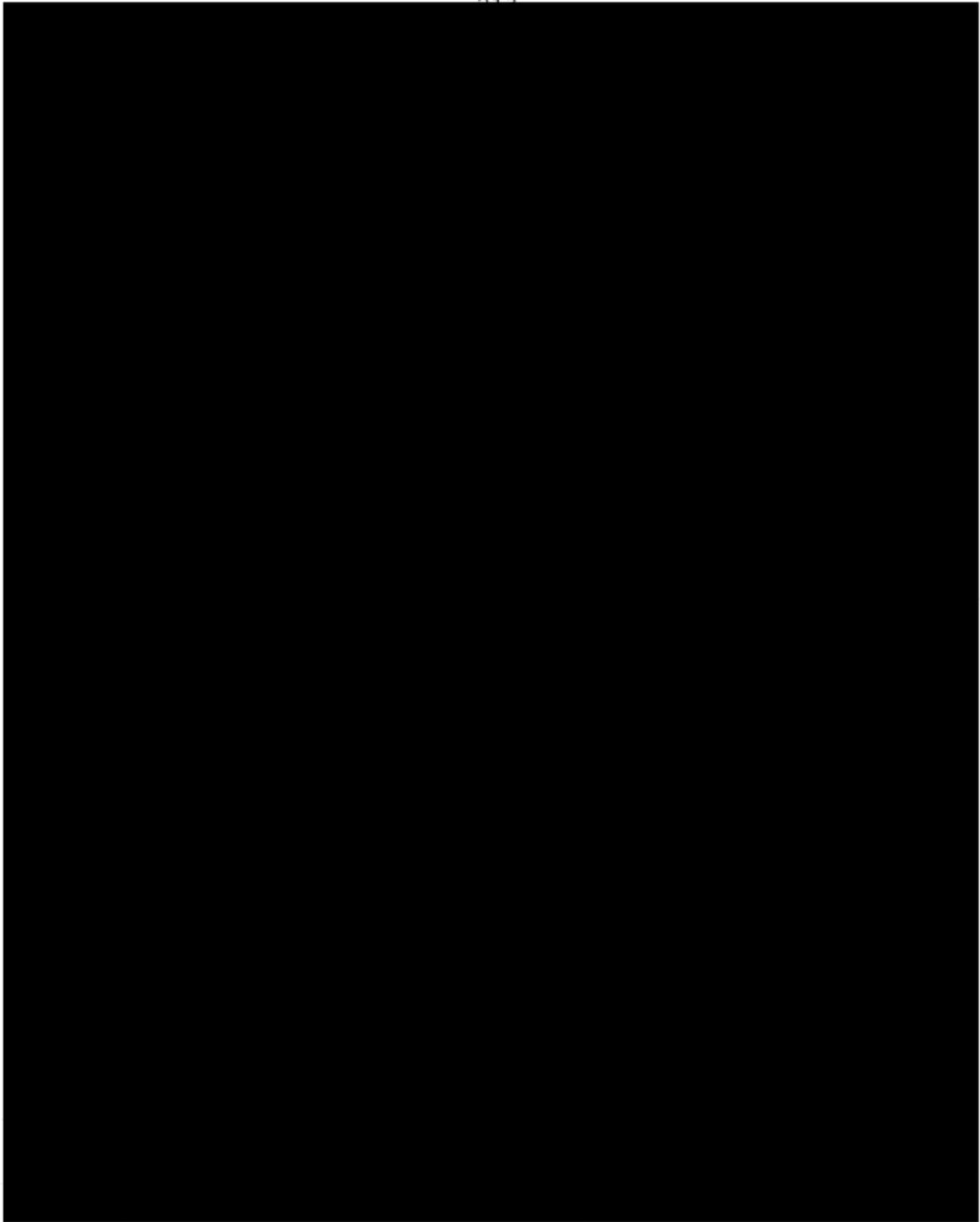
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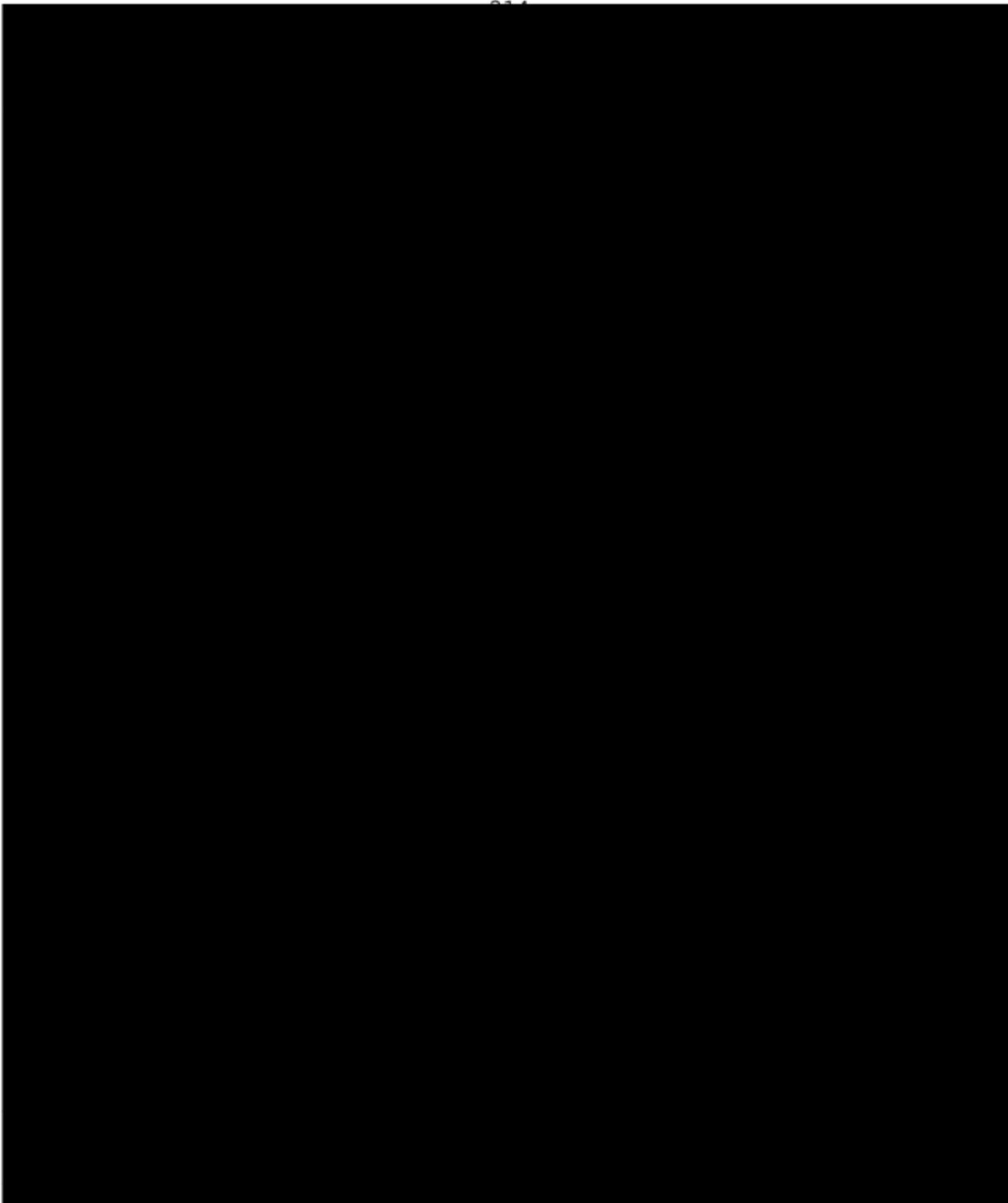
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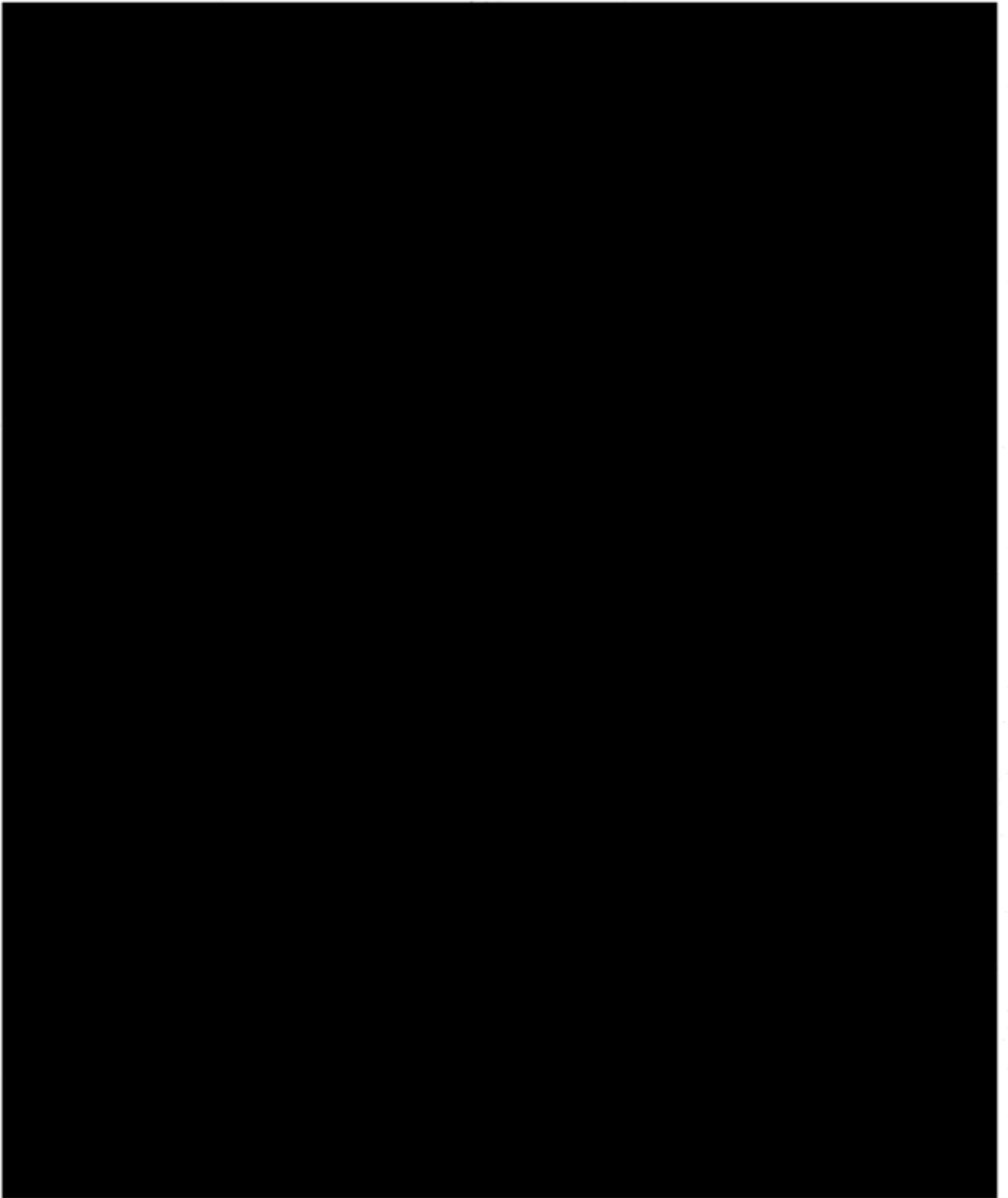
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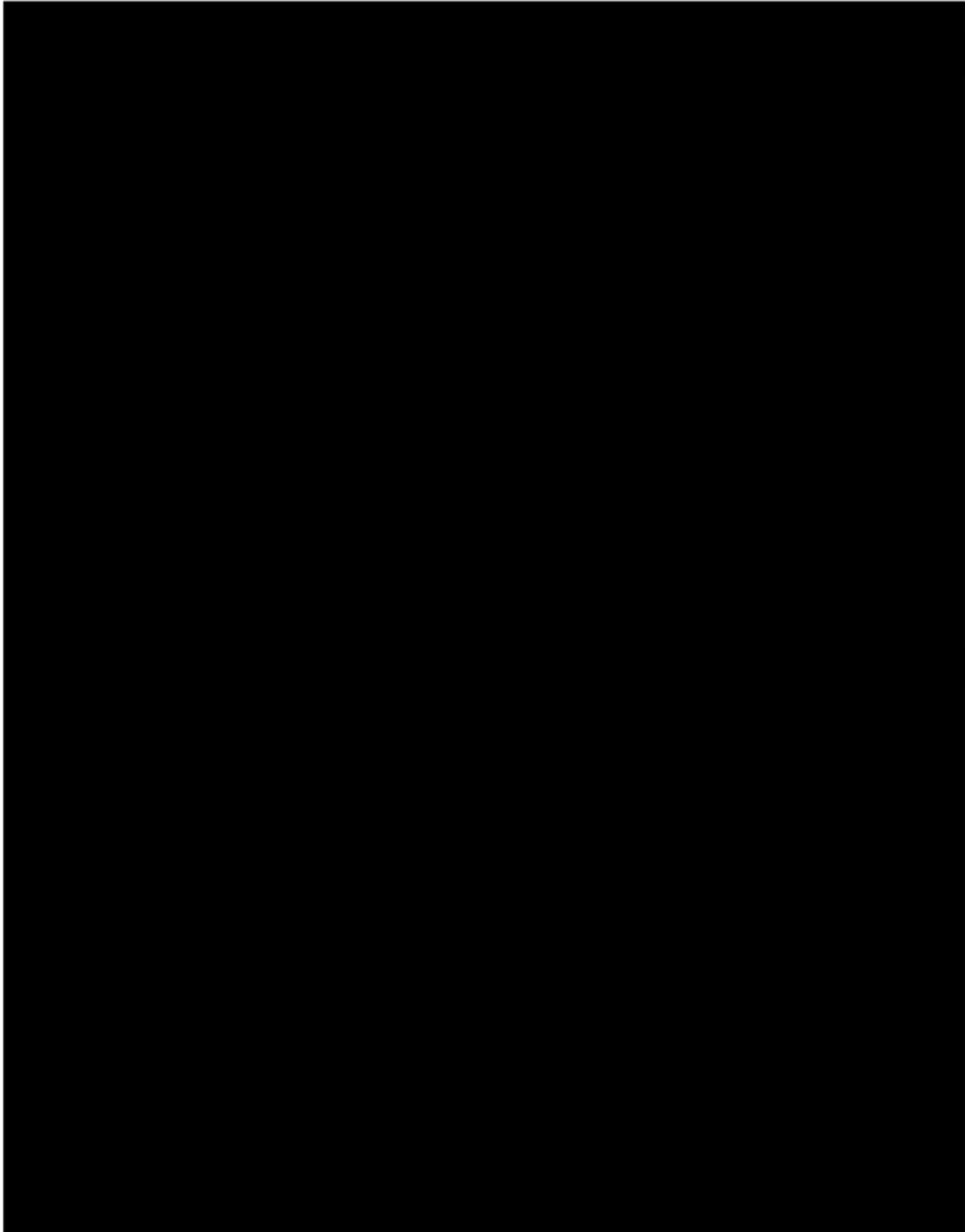
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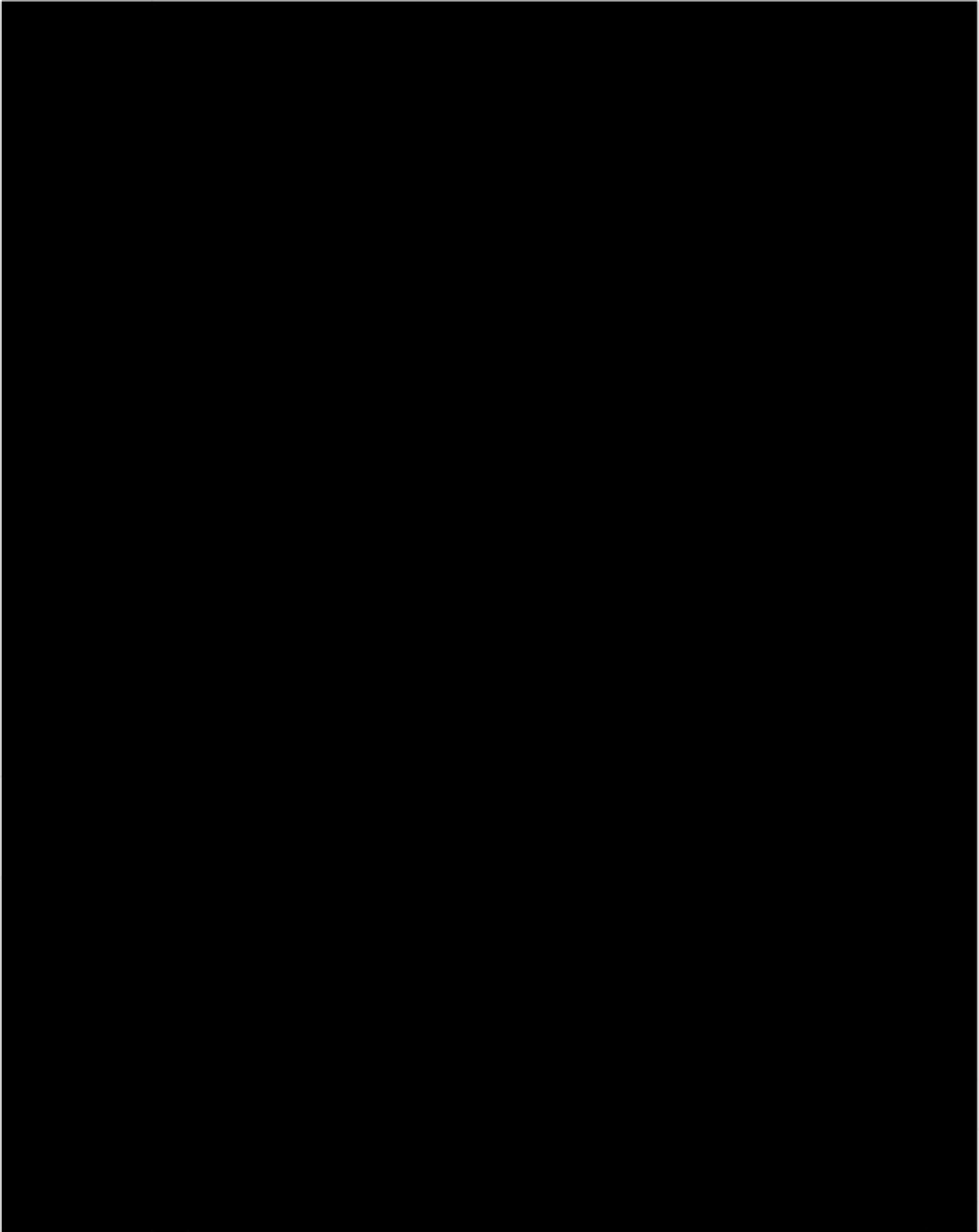
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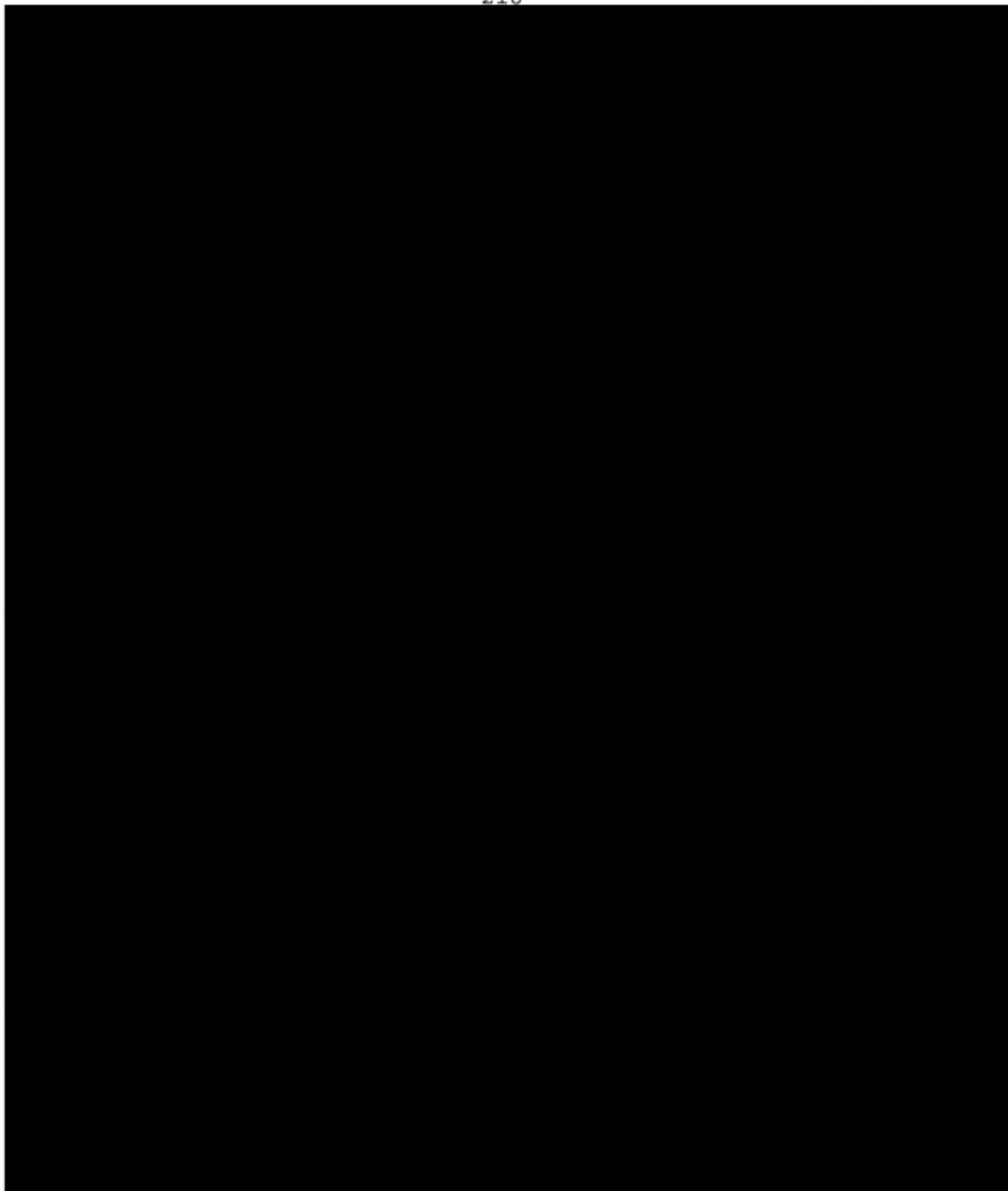
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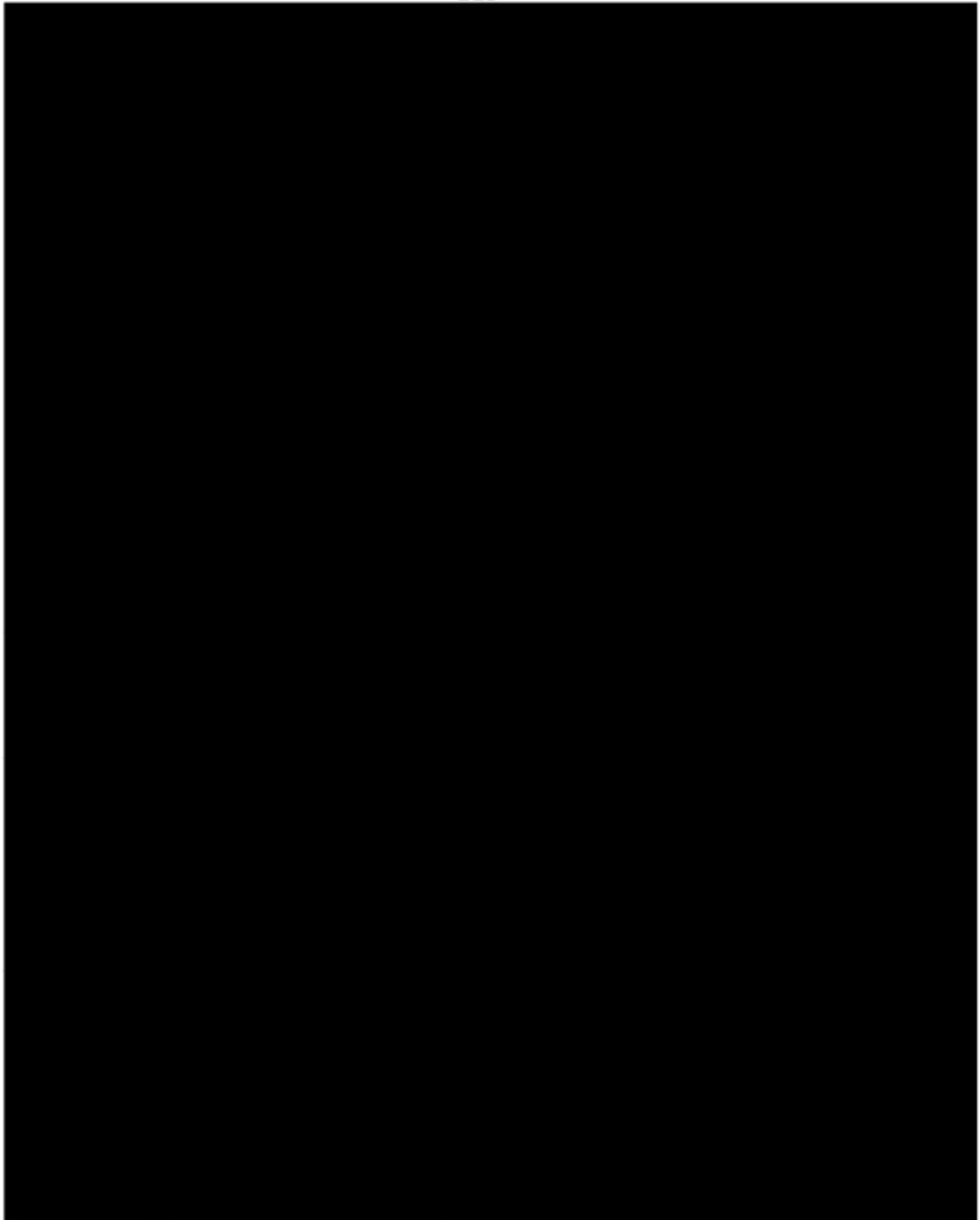
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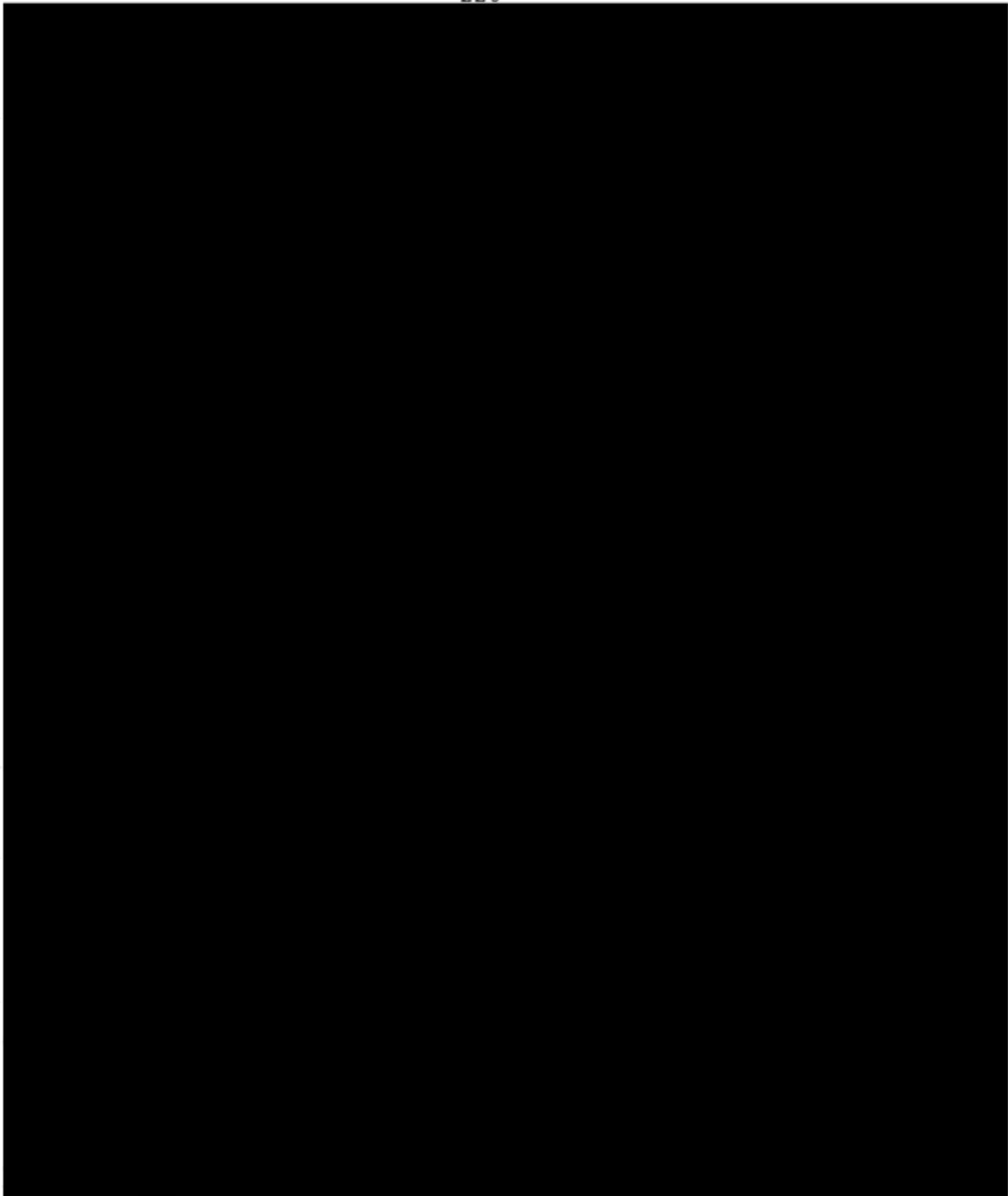
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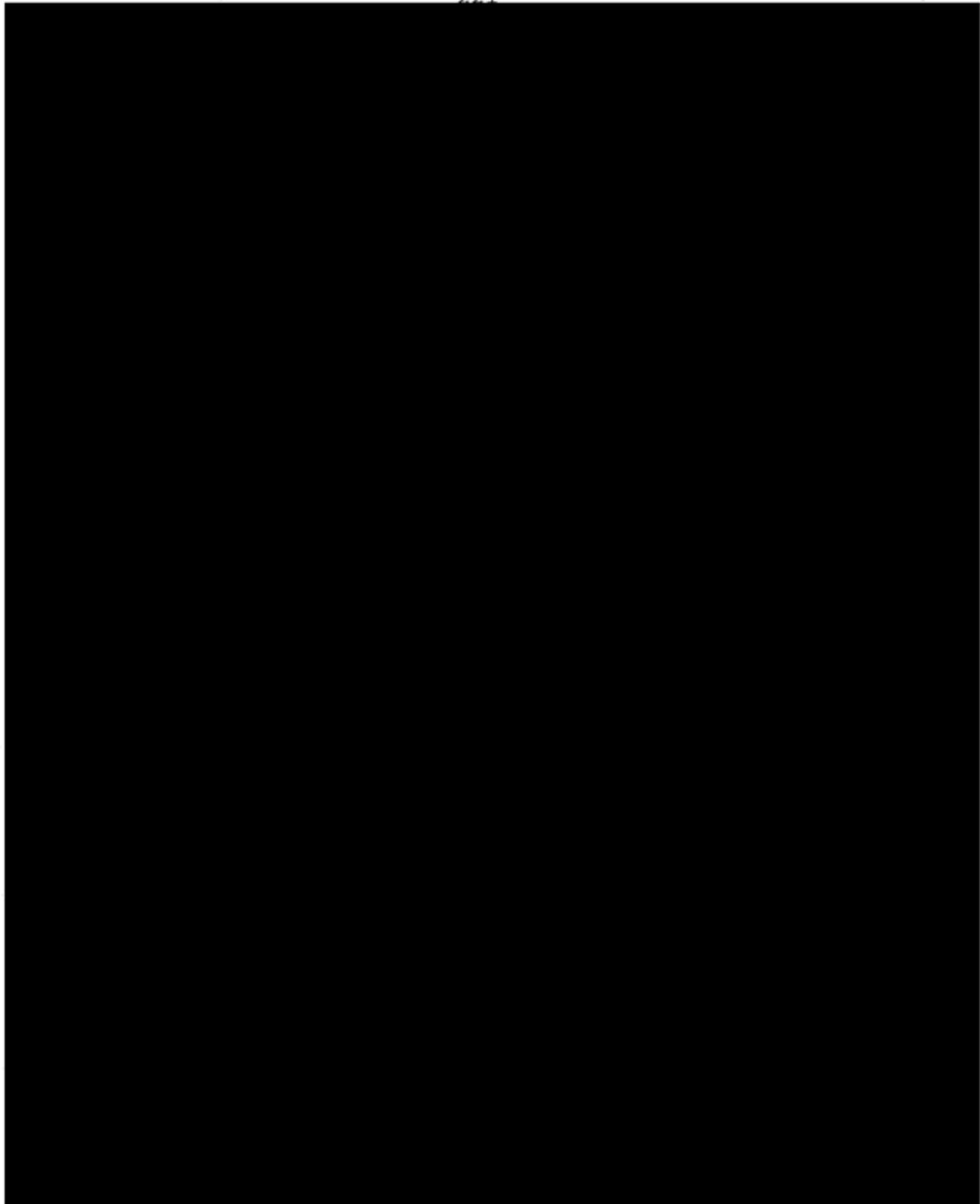
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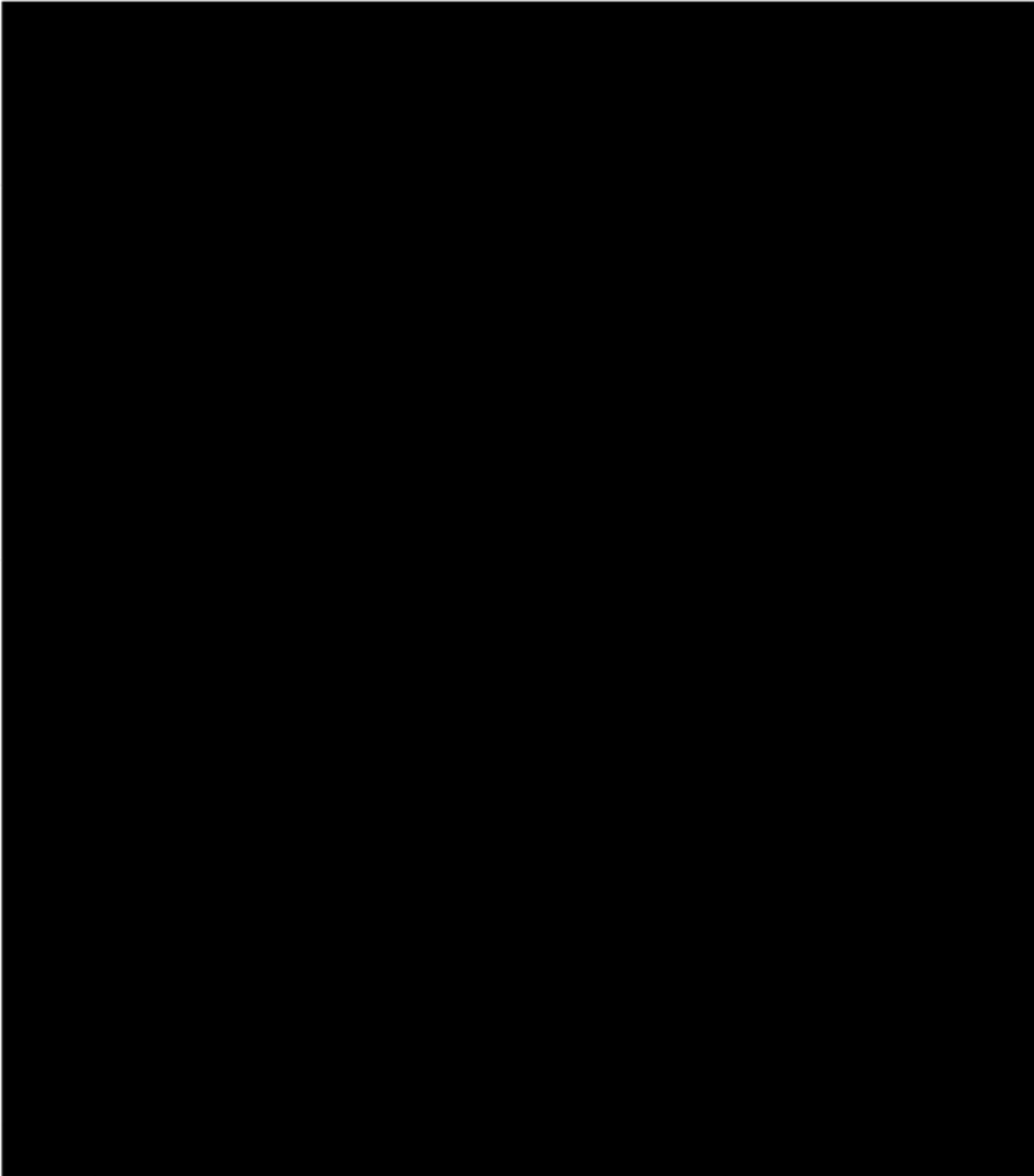
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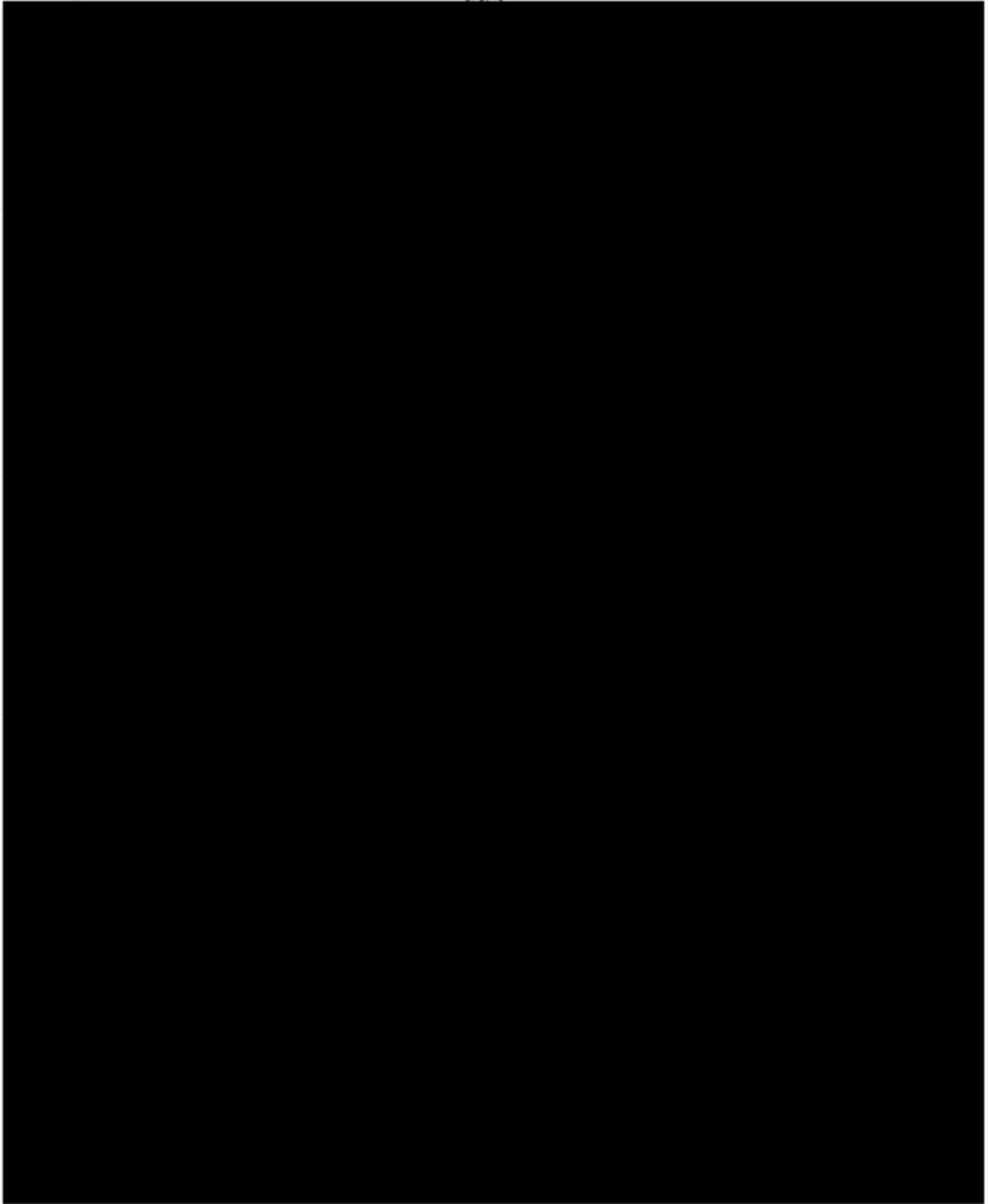
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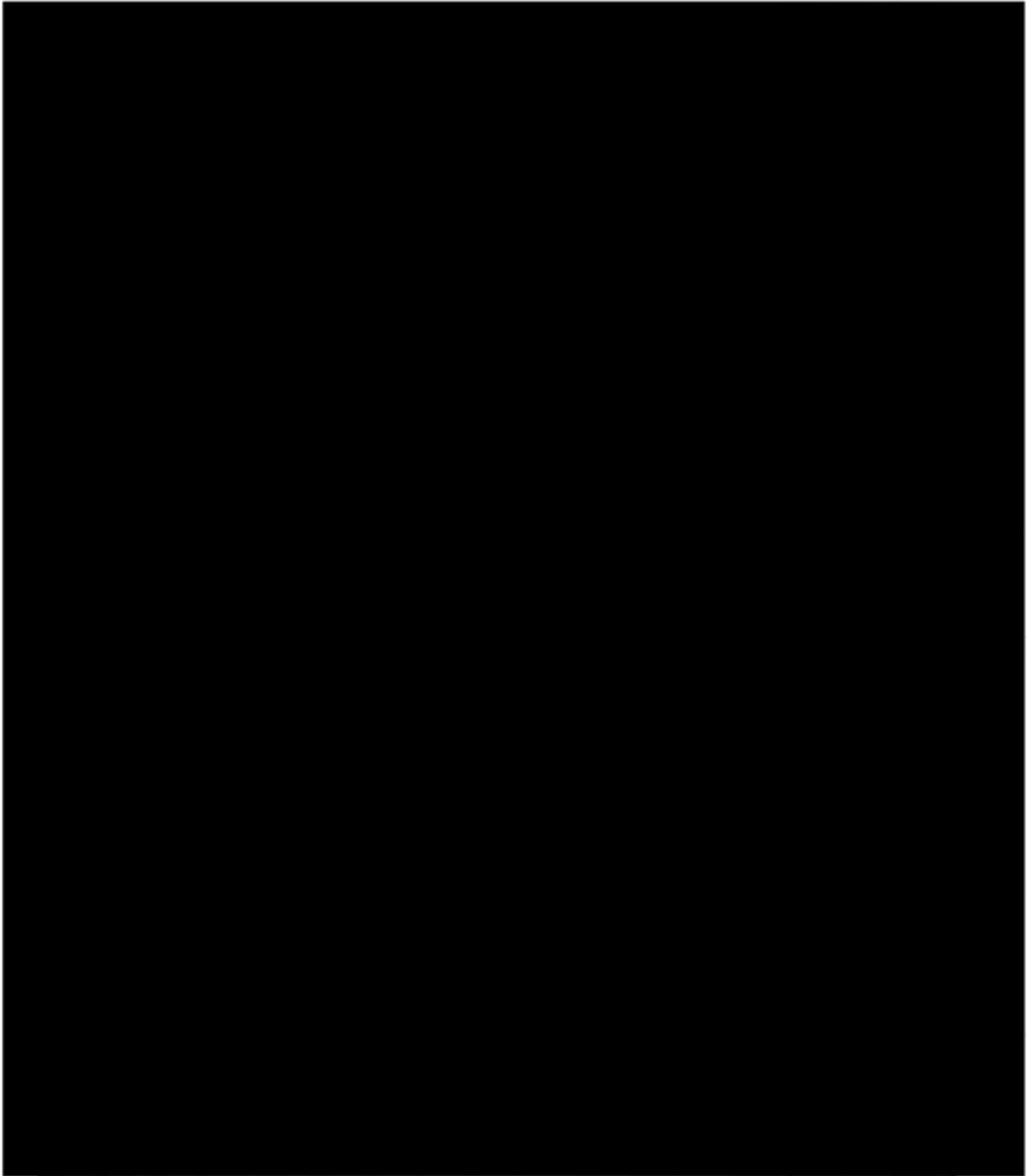
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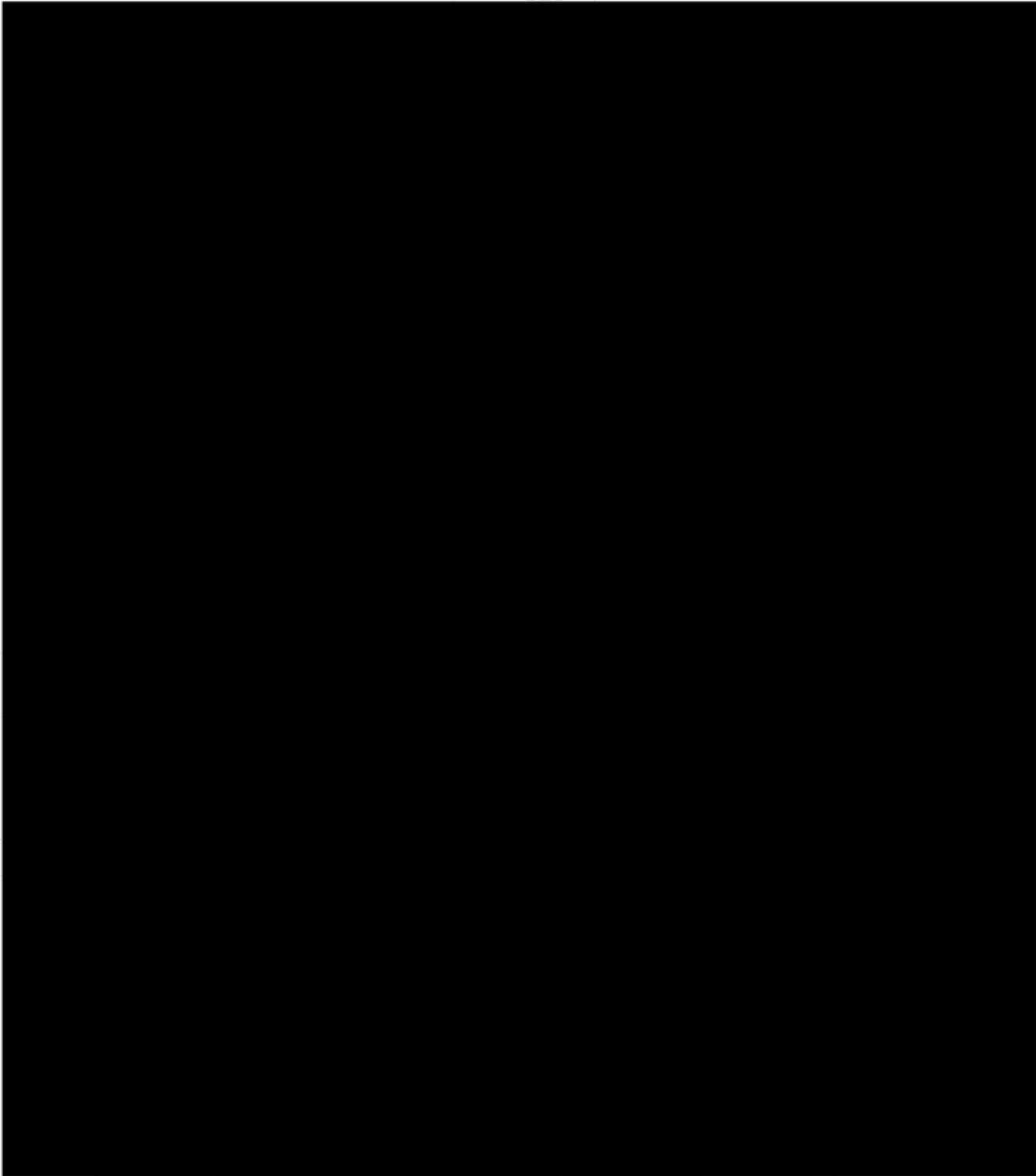
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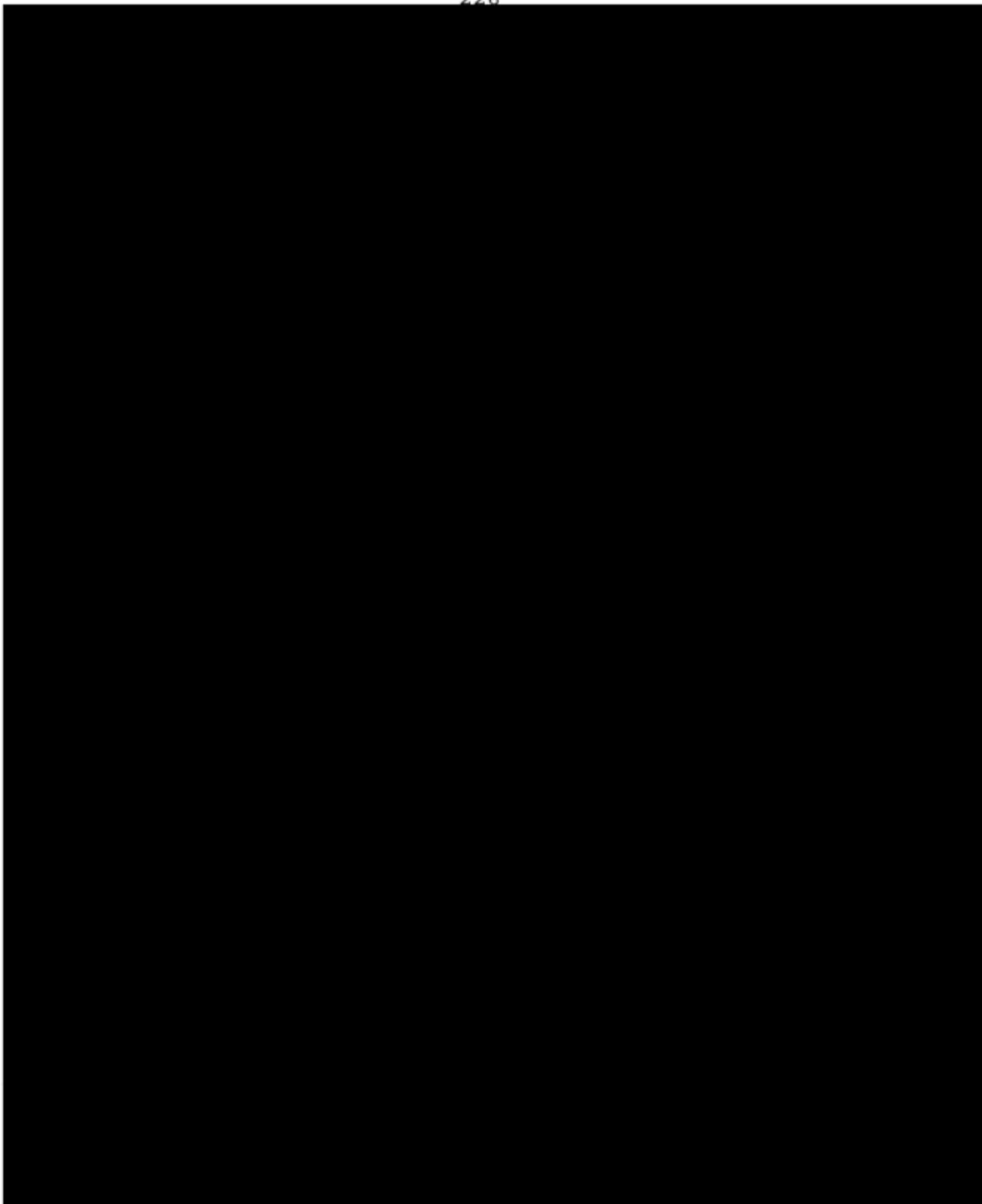
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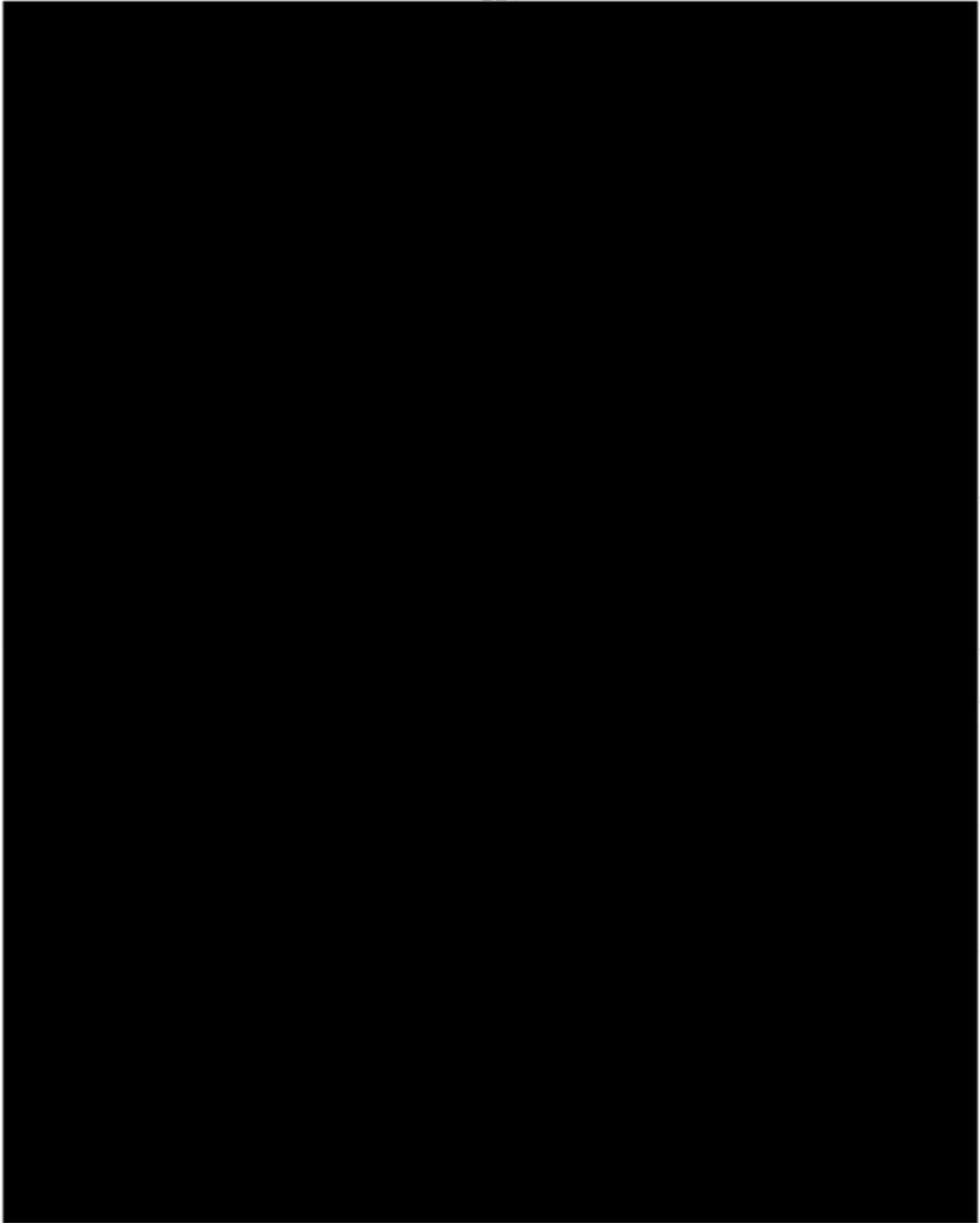
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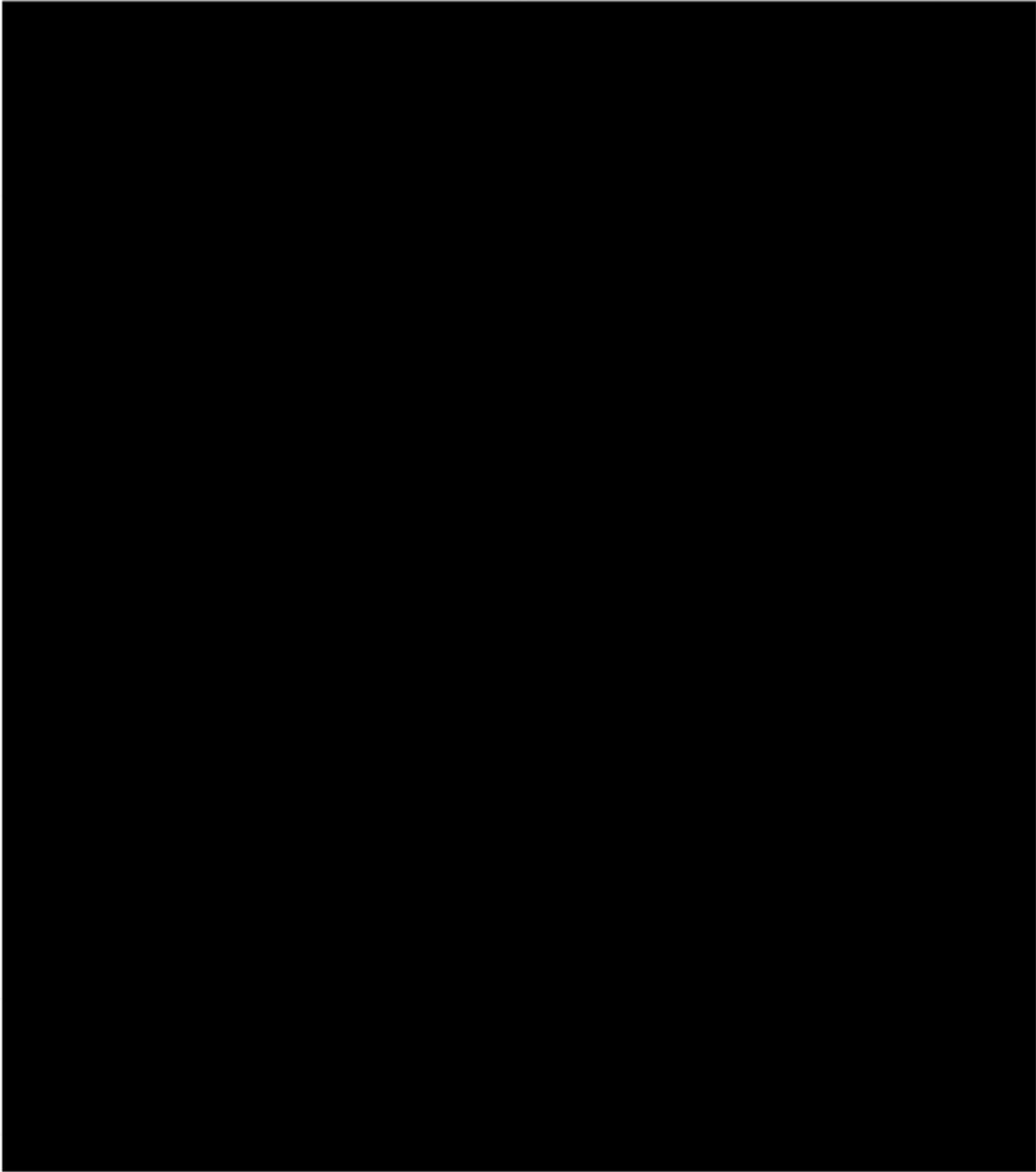
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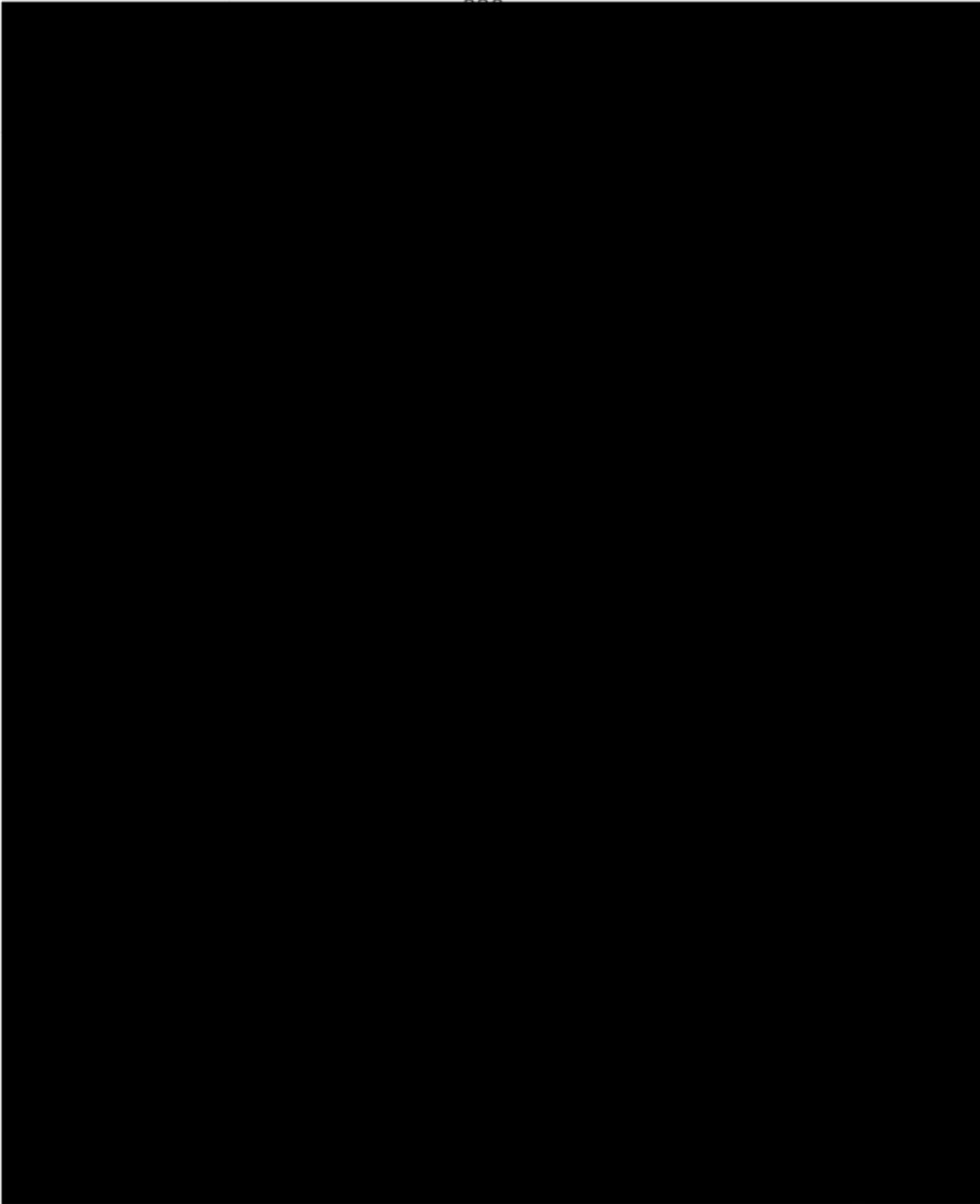
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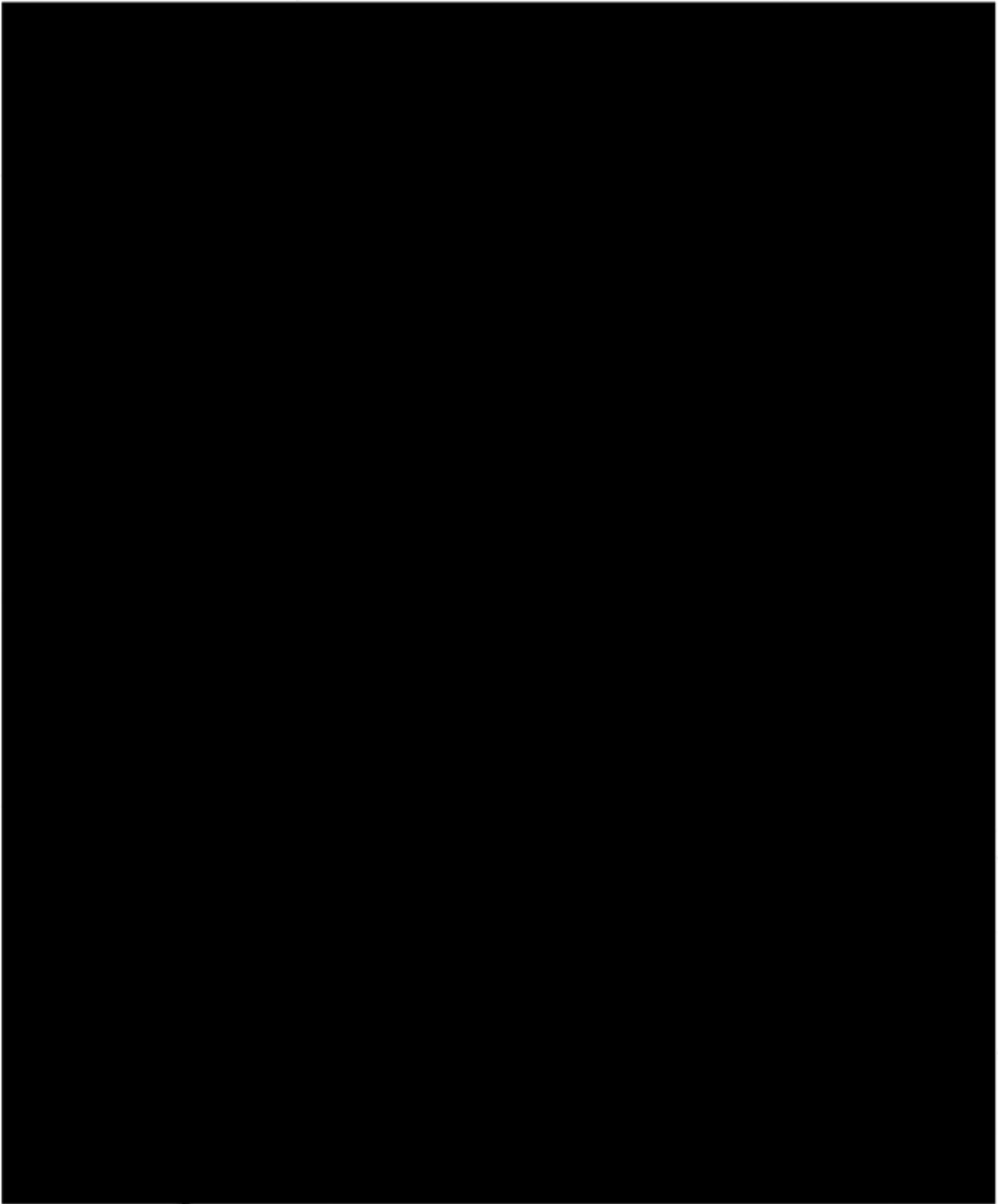
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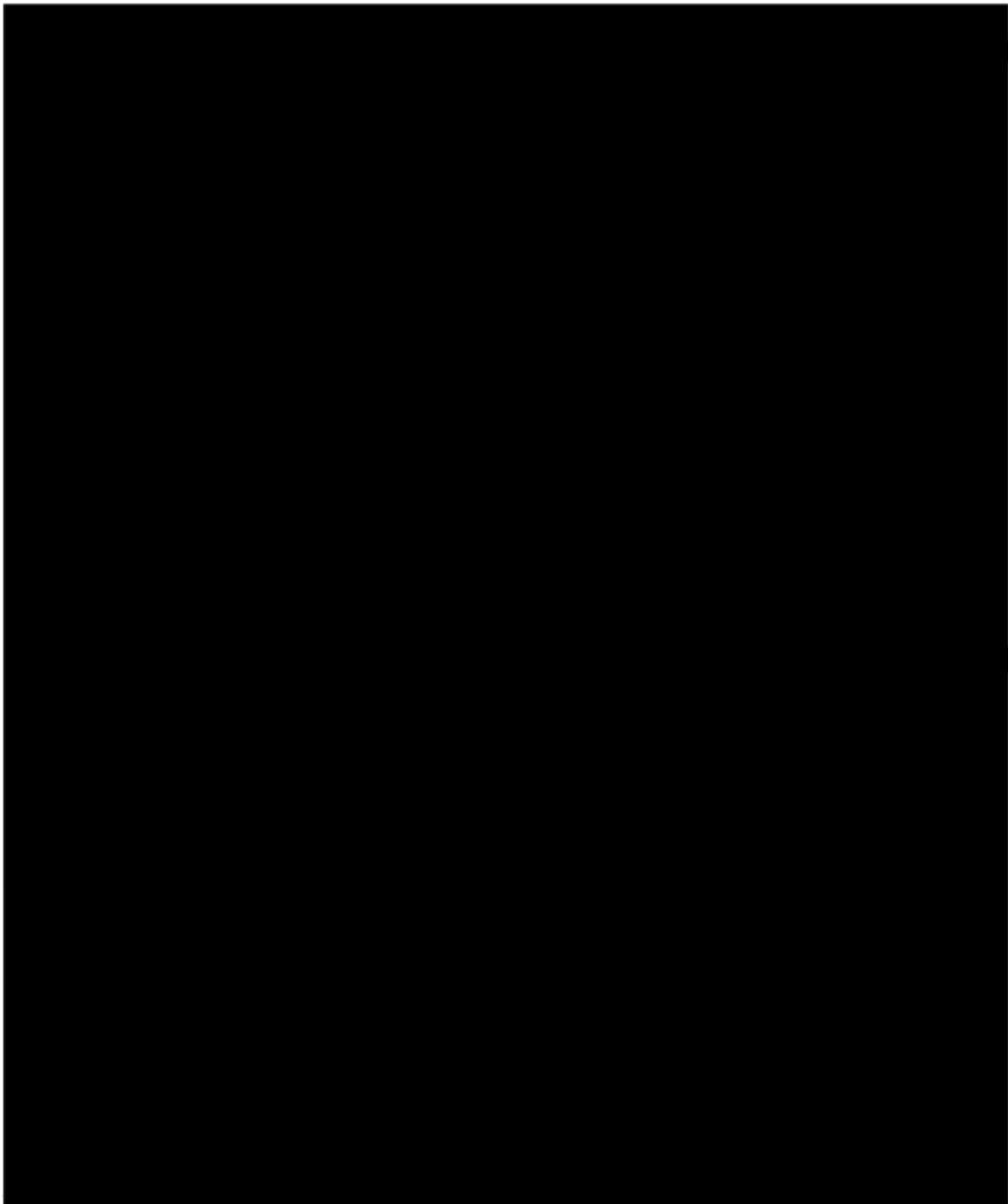
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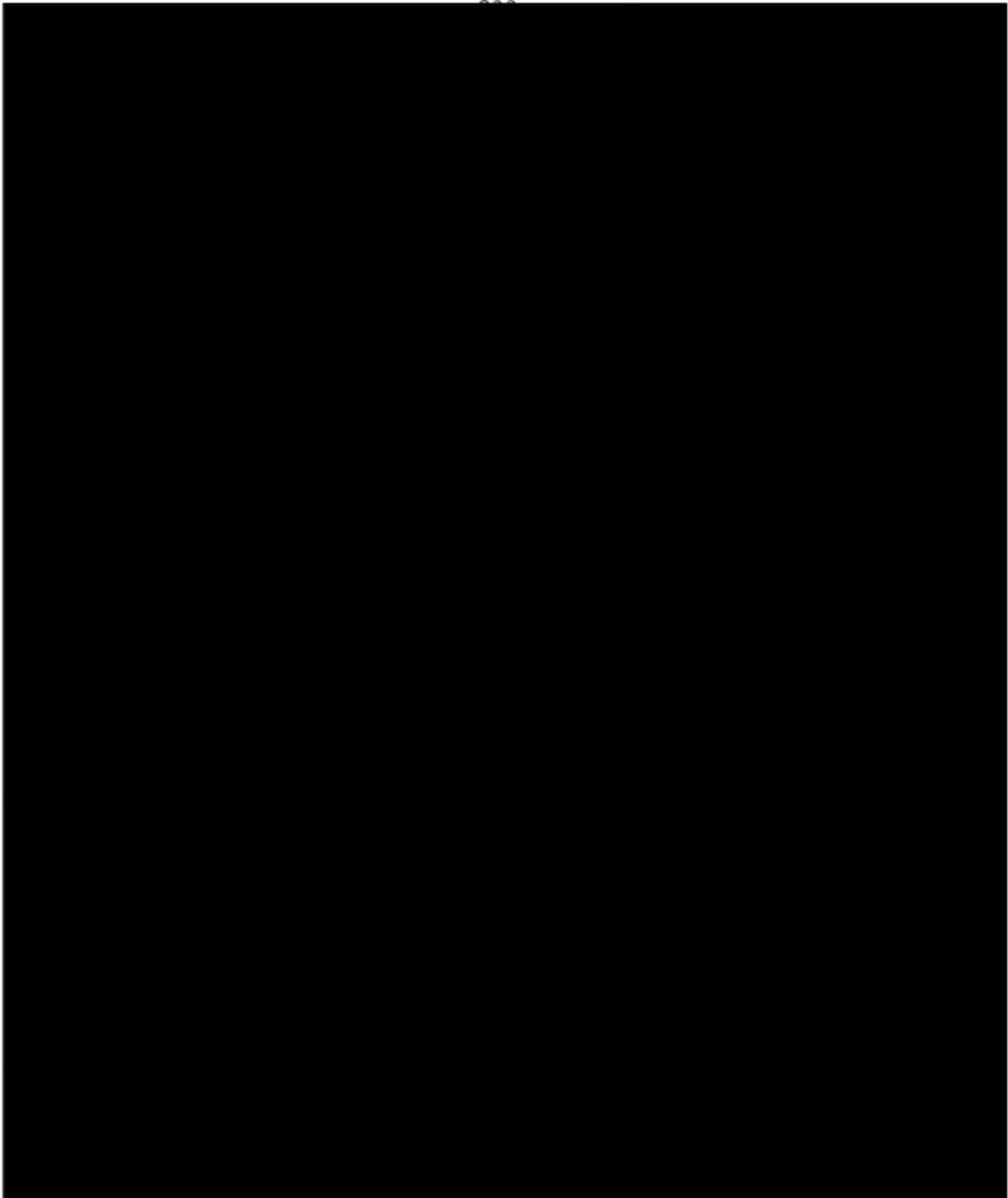
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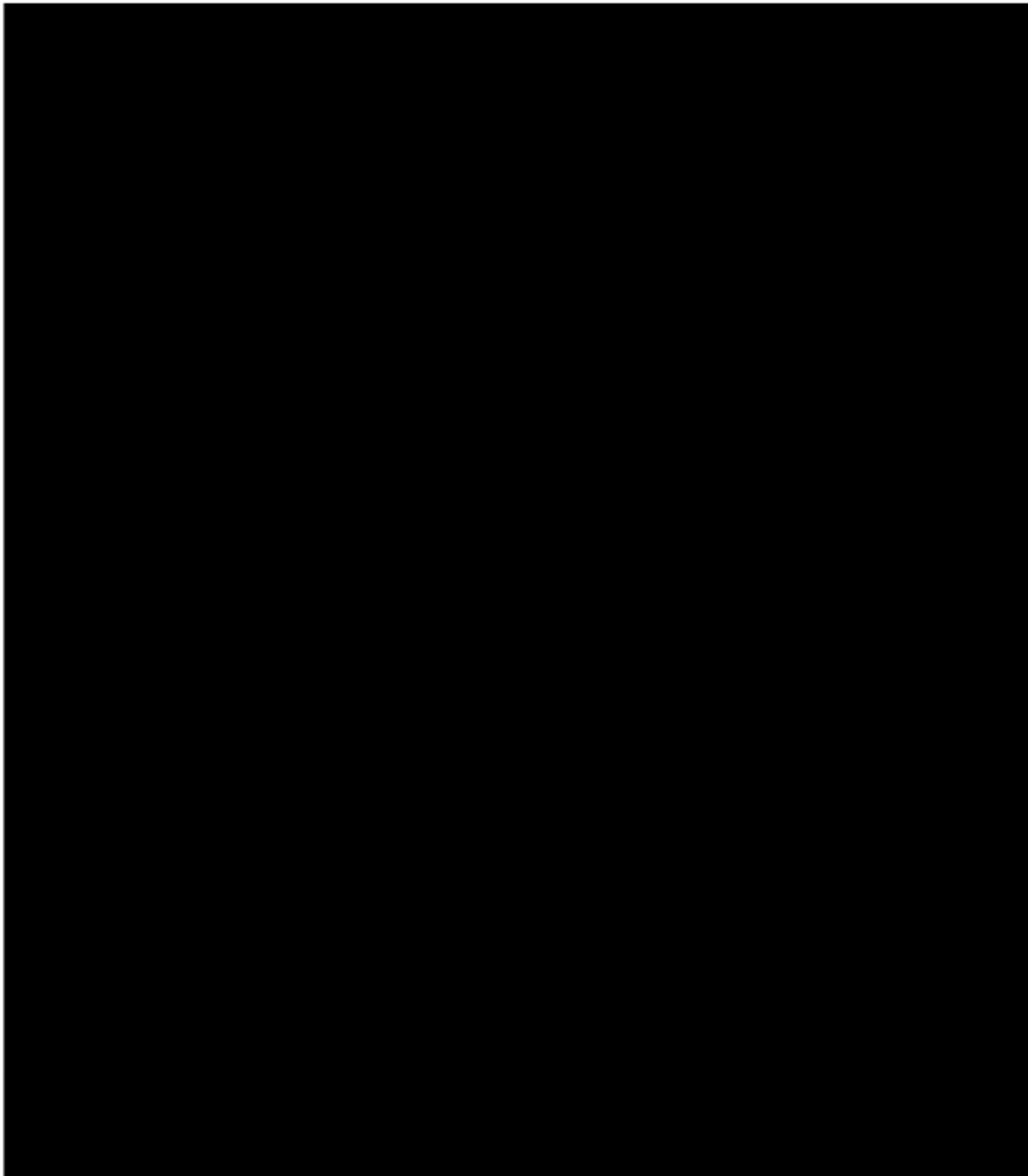
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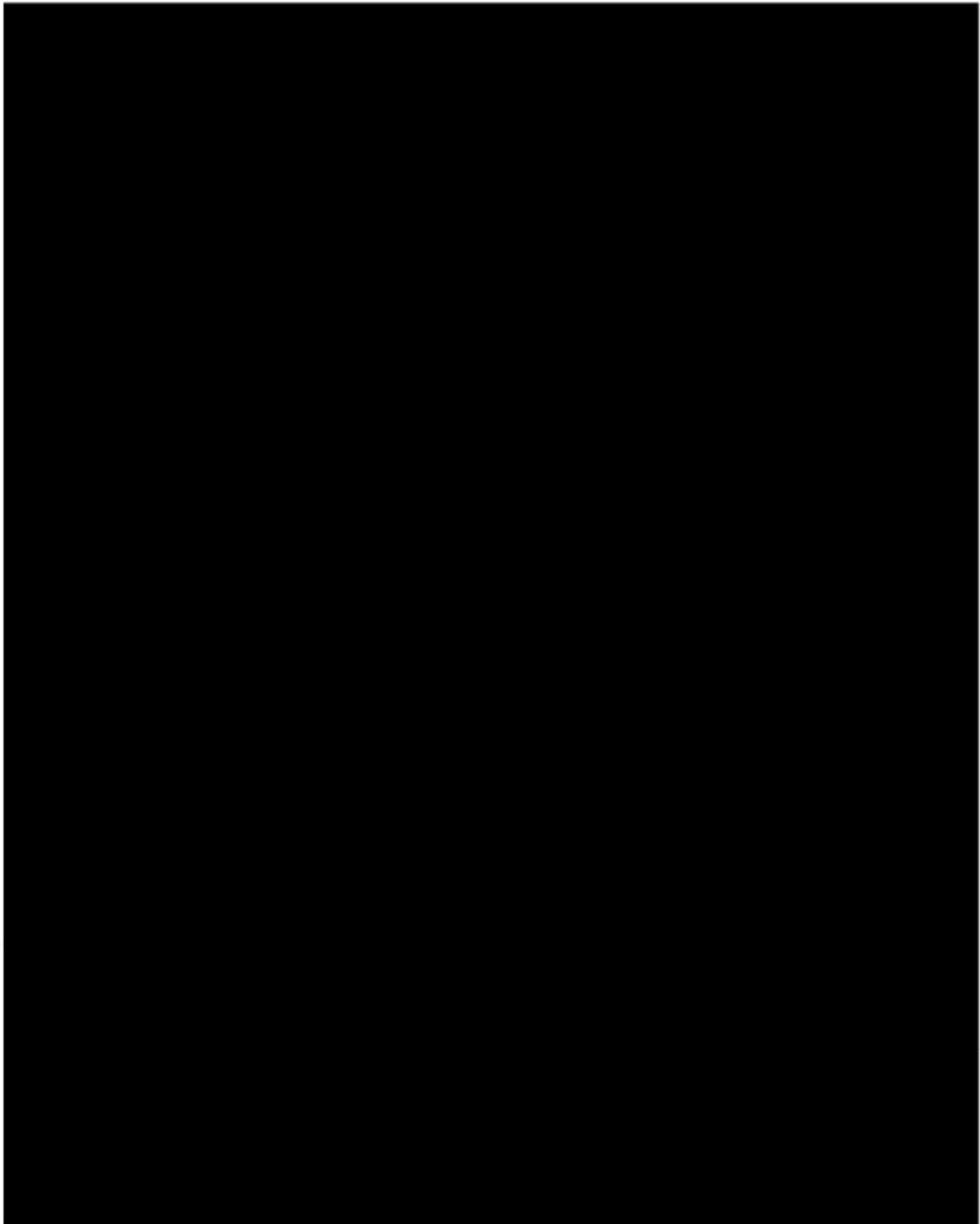
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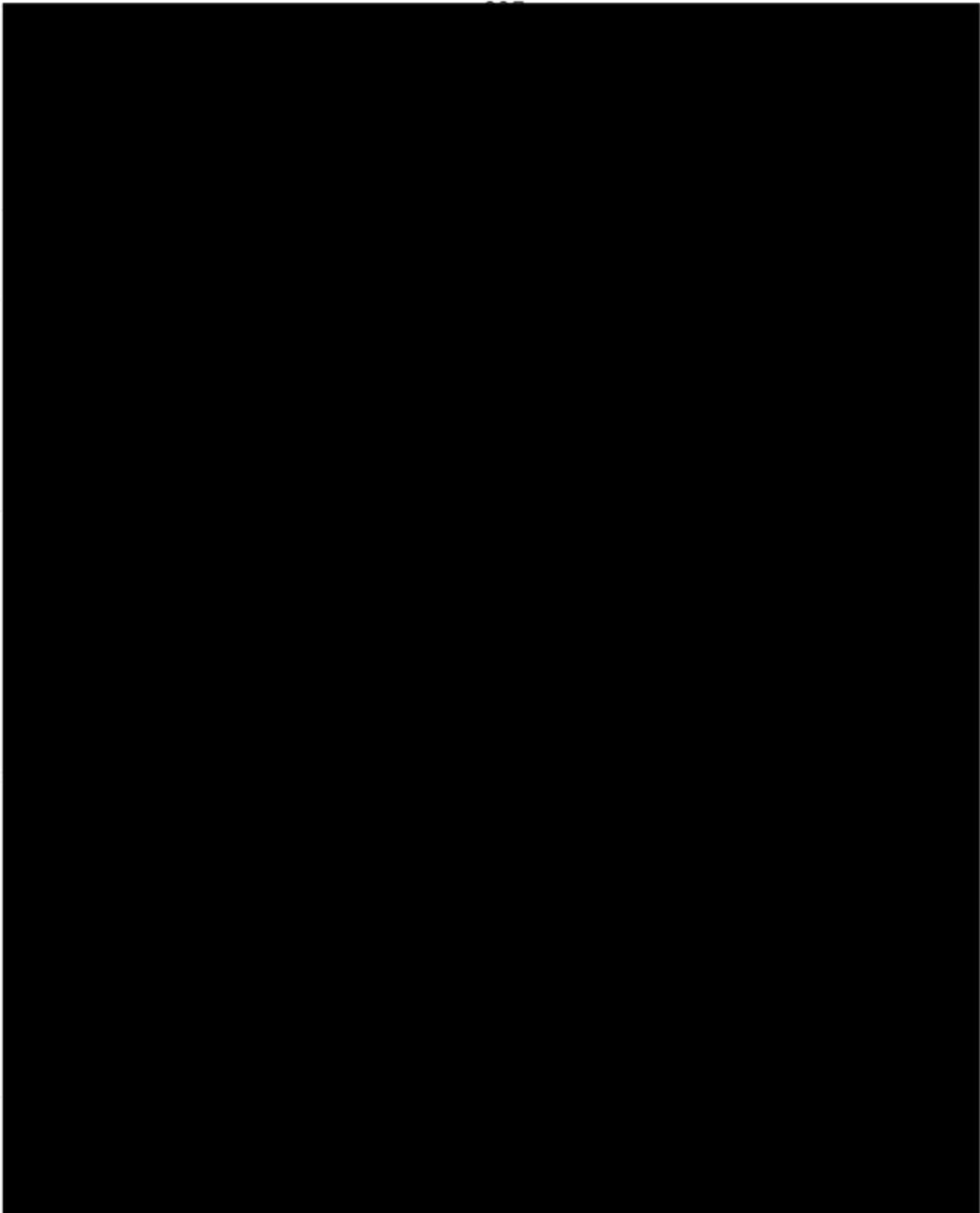
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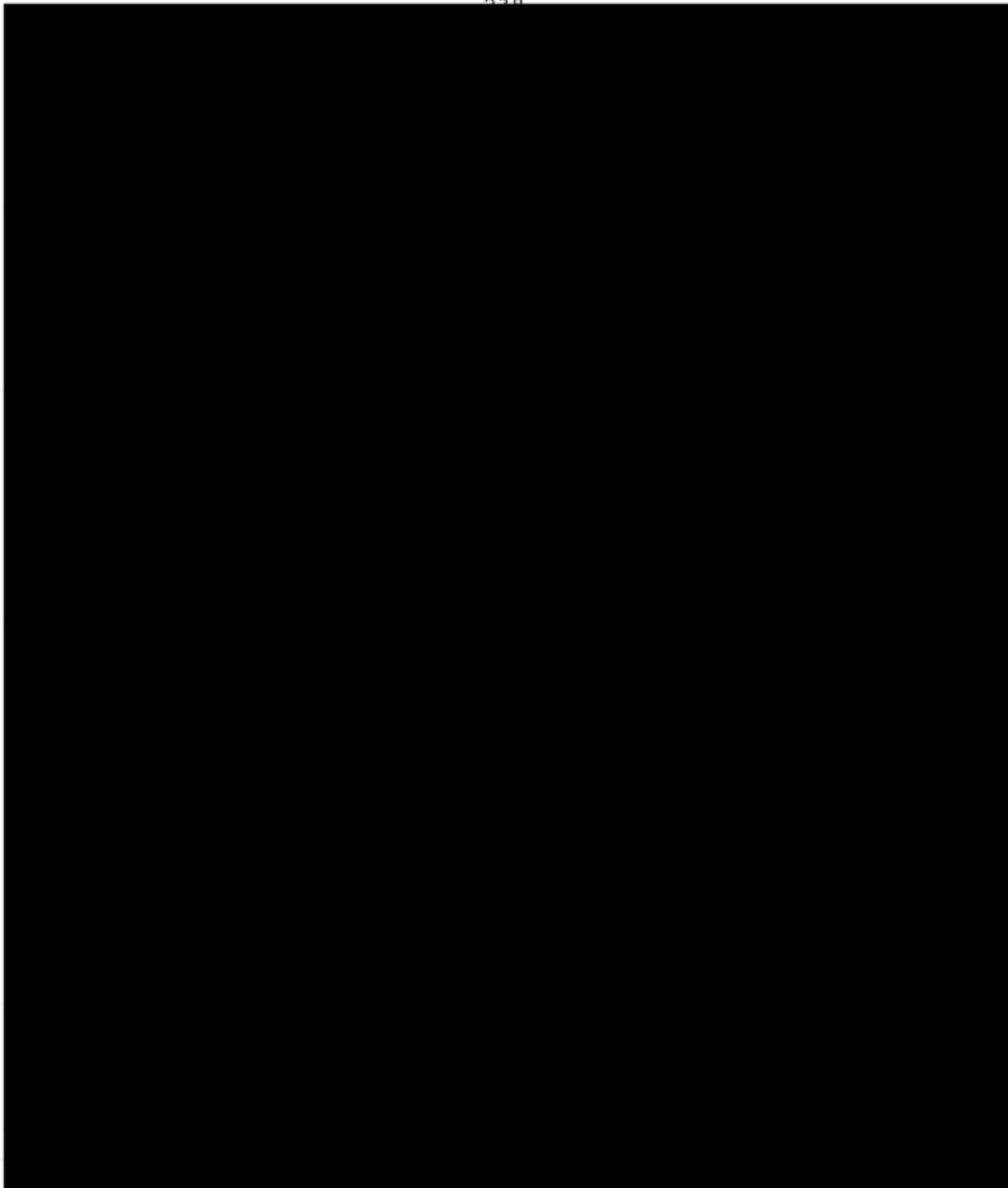
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