

1 feet in total. Well, maybe that; is that right?
 2 Maybe nine --
 3 LEAH SAFFIAN: Yes.
 4 GHISLAINE MAXWELL: It is on three floors,
 5 however. So you're talking about a little -- it's a
 6 jewel. It used to be a stable for a horse. It was
 7 the stables for the big house. It was a little poor
 8 man's home behind the rich man's home. It's a jewel.
 9 It's a -- was a gorgeous little place, but
 10 it is the size of a nut. If you make a noise, let's
 11 say, a little burp or something you don't want to --
 12 you'd hear it. It just --
 13 Where she says that they had relations in
 14 a bathroom, I -- first of all, the bath is an old
 15 Victorian bath. I could -- I'm quite -- quite small,
 16 it's tight for me. I put my brother in there to see
 17 what would happen. And it looks like a blivet, which
 18 is a sausage in like a very tight skin.
 19 So her description of whatever the two
 20 people were doing in the tub, that wouldn't work.
 21 The bathroom itself is so small, you can't lie flat
 22 on the floor. So it couldn't happen on the floor,
 23 because you physically, physically can't. This
 24 bathroom is too small to even be on the floor.
 25 And then the kicker of all kickers, is

1 that because the bathroom was so small, I decorated
 2 it to try make it look huge, which meant that I put
 3 mirrors the whole way around it. And what was so fun
 4 about being in there is that if you stood in the
 5 bathroom, you saw like a hundred of you, like you do
 6 if you were in --
 7 DAVID MARKUS: A fun house.
 8 GHISLAINE MAXWELL: Yeah, well, Alice in
 9 Wonderland or one of those things that you would see
 10 yourself going, stretching everything. And the
 11 image. If you said you were -- let's say you were,
 12 let's say that [REDACTED] was telling the truth.
 13 She could say she was having sex with
 14 5,000 generations of the Royal Family, because that's
 15 how far back you could see yourself. There is no way
 16 in God's green earth if that had taken place, that
 17 this is something that you would miss, because it's
 18 -- you couldn't miss it.
 19 If you were standing there, you'd see the
 20 whole -- the FBI, the whole Department of Justice
 21 standing behind you. It's like, no.
 22 TODD BLANCHE: Did you --
 23 LEAH SAFFIAN: And also -- let me just --
 24 also explain where the tap was in the bathtub.
 25 GHISLAINE MAXWELL: Oh, well it's an old

1 Vic- had a tap. So if you were in -- if you were in
 2 the top, right, it might -- this is the tub. My tap
 3 would be here, I think -- no.
 4 TODD BLANCHE: So you think it's kind of
 5 logistically and physically not something that could
 6 have happened.
 7 GHISLAINE MAXWELL: Well, there's that.
 8 And there's just -- Andrew would -- he's so English.
 9 He's so -- he had a tie on.
 10 DAVID MARKUS: Do you think there's any
 11 way it could have happened or no?
 12 GHISLAINE MAXWELL: Absolutely on -- no
 13 way -- no how, absolutely not. Wait, I haven't
 14 finished. So on her --
 15 TODD BLANCHE: Go --
 16 GHISLAINE MAXWELL: Oh, sorry.
 17 DAVID MARKUS: No, go ahead. Go ahead.
 18 GHISLAINE MAXWELL: I'm sorry.
 19 TODD BLANCHE: Go ahead. Go, go, go.
 20 Finish. Please, go ahead.
 21 GHISLAINE MAXWELL: Sorry. Can I finish?
 22 TODD BLANCHE: Okay.
 23 GHISLAINE MAXWELL: Okay. When all this
 24 nonsense took place, where this whole story with the
 25 picture and the this and the that and this bullshit,

1 I believe that this whole thing was manufactured, and
 2 I can point you to some potentially corroborating
 3 evidence of this.
 4 So when she gave the photograph to the FBI
 5 in Australia --
 6 DIEGO PESTANA: Just to be clear, the
 7 photo, you're talking about, you're talking about the
 8 famous one where --
 9 GHISLAINE MAXWELL: Yeah, I have a image
 10 of it here. Who wants to look at it?
 11 DIEGO PESTANA: -- where Prince Andrew is
 12 holding [REDACTED] and you're in the background?
 13 GHISLAINE MAXWELL: The fake, just to be
 14 clear. So on the back of that, and this is in the
 15 discovery by the way. I don't know if it's in -- I
 16 don't know where, which discovery I saw it in now.
 17 But this -- she wrote, she, [REDACTED]
 18 wrote in the back that it was a picture that was
 19 taken in January of 2000 and -- on 2000 or 2001, I
 20 don't remember.
 21 TODD BLANCHE: Okay.
 22 GHISLAINE MAXWELL: So now in her
 23 handwriting, that she's giving the FBI this picture,
 24 suddenly now it's March. So how do you go from her
 25 writing it's January to March. It's because it

1 only -- it's the only one that fit with the flight
2 logs, that when she could be in London and this took
3 place.

4 The second thing is that -- oh, I'm so
5 excited to tell you this. There is a journalist, I
6 know you guys are quite -- well, I don't know. The
7 fake news is at work here.

8 So there's a journalist called Sharon
9 Churcher. There is a lawyer called Brad Edwards.
10 These two -- and there is a Southern District of
11 Florida prosecutor called Villafana.

12 I would very much look forward to showing
13 you the relationship between these three parties that
14 created that story.

15 TODD BLANCHE: Why? Well, without --
16 putting aside the relationship, why do you think they
17 created that story?

18 GHISLAINE MAXWELL: I believe that story
19 was created for the purposes of -- well, there are
20 multiple. The first one is financial, the second one
21 is for the purposes of the CVRA case. The third one
22 was for the serialization, both of her book and in
23 the papers, for the story to attack the Royal Family.

24 And just as a --

25 TODD BLANCHE: So I think when -- when you

1 were just asked about the photo, you said you
2 actually thought the photo was fake.

3 Do you think it was just misdated or do
4 you think it's a fake -- literally a fake photo?

5 GHISLAINE MAXWELL: I believe it's
6 literally a fake photo.

7 TODD BLANCHE: Why do you think that?

8 GHISLAINE MAXWELL: Well, first of all, I
9 don't remember it. We'll start --

10 TODD BLANCHE: But you --

11 GHISLAINE MAXWELL: Right. Okay. But the
12 outfit I'm wearing --

13 TODD BLANCHE: Yeah.

14 GHISLAINE MAXWELL: -- is the outfit from
15 my mum's birthday party.

16 TODD BLANCHE: So but you don't have
17 any -- do you dispute that they've met each other?

18 DAVID MARKUS: Do you know whether they've
19 met each other?

20 GHISLAINE MAXWELL: I do not know that
21 they met.

22 TODD BLANCHE: Okay. So -- so you not
23 only -- so you think the photograph is fake, but you
24 also are not even positive they actually ever met
25 each other.

1 GHISLAINE MAXWELL: I'm not.

2 TODD BLANCHE: So you don't have a
3 specific recollection of kind of being at an event or
4 a party or your apartment, or you know, you're flat
5 in London with Prince Andrew and **DOJ REDACTION**

6 GHISLAINE MAXWELL: Absolutely not.

7 DAVID MARKUS: She doesn't know one way or
8 the other.

9 TODD BLANCHE: Understand that.

10 GHISLAINE MAXWELL: I'm just -- I want you
11 to know that --

12 TODD BLANCHE: No, I know.

13 GHISLAINE MAXWELL: I -- the reason why --
14 I'm not hesitant. I'm not -- I don't have any memory
15 of that, so that -- that's not the issue. The issue
16 is, could Andrew have come to the house to see me or
17 see Epstein, and say hi and she had been there? Yes.
18 I can't say that that didn't happen.

19 But what I can absolutely, categorically
20 say is that I never, at any time, set Andrew up to
21 have relations with her or any other human being
22 ever.

23 And I can categorically state that her --
24 her characterization of whatever may or may not have
25 happened, could -- physically would just no. And

1 plus, I was in the country, so all of that's just not
2 conceivable.

3 TODD BLANCHE: Did you attend -- did you
4 attend social parties over -- and again, I really,
5 now I'm focused on 2000 plus, so not -- not the
6 earlier, where Mr. Epstein would host a party or be a
7 big part of the hosting of the party and some of, or
8 many of the young women who were masseuses would be
9 invited to the party, as guests or his entertainment?

10 GHISLAINE MAXWELL: I certainly went to
11 his house when he would have people who would be
12 there that were -- I call them -- I would -- the way
13 I would think of it and I would characterize it, were
14 his entourage. That's how I thought about it. And
15 that certainly was in the later 2000s, Yes.

16 TODD BLANCHE: Did -- did you attend any
17 weddings of famous people with Mr. Epstein? Again,
18 I'm mostly focused on post -- plus -- post 2000, but
19 if there's something that comes to mind in the '90s,
20 that's fine as well.

21 GHISLAINE MAXWELL: A wedding?

22 TODD BLANCHE: Weddings.

23 GHISLAINE MAXWELL: With Epstein? I don't
24 think I ever went to a wedding with Epstein. I can't
25 think of a wedding that I ever went to with him.

1 TODD BLANCHE: Do you know -- so you don't
2 remember -- you didn't attend President Clinton's
3 daughter's wedding --
4 GHISLAINE MAXWELL: I did.
5 TODD BLANCHE: -- Chelsea Clinton's.
6 GHISLAINE MAXWELL: Right.
7 TODD BLANCHE: But that wasn't with
8 Mr. Epstein?
9 GHISLAINE MAXWELL: No, it was with
10 Ted Waitt, my boyfriend.
11 TODD BLANCHE: Say it again.
12 GHISLAINE MAXWELL: With Ted Waitt, my
13 boyfriend.
14 TODD BLANCHE: Okay. Do you know whether
15 Mr. Epstein was at that wedding?
16 GHISLAINE MAXWELL: He was not.
17 TODD BLANCHE: Okay. And how did you --
18 did you have a relationship -- well, why did you get
19 invited to that wedding?
20 GHISLAINE MAXWELL: Because Ted and
21 Clinton were very close.
22 TODD BLANCHE: And why -- how were you
23 close to them? Like what was the reason you were
24 close to them?
25 GHISLAINE MAXWELL: I met President

1 Clinton -- well, I first of all, I went to the
2 White House with Epstein once for, I think it was for
3 a historical, like one of those benefits and I met
4 the President then, but like a thousand other people
5 shook his hand.
6 Then after that, I had a very -- a good
7 friend of mine that was the mayor -- known to be the
8 Mayor of Miami Beach, Philip Levine, and Philip and
9 the President were very good friends. And Philip was
10 a very -- and I were very good friends, and so I
11 actually was introduced to the President post his
12 coming out of the White House and became friendly
13 with him, because of Philip Levine.
14 DAVID MARKUS: Because of what?
15 GHISLAINE MAXWELL: Philip Levine.
16 TODD BLANCHE: There's some names that
17 have been publicly associated with Mr. Epstein that I
18 just want to ask you if you know about: Piers
19 Morgan?
20 GHISLAINE MAXWELL: Is friendly with who?
21 TODD BLANCHE: With Mr. Epstein.
22 GHISLAINE MAXWELL: I have no idea.
23 Never. I doubt it.
24 TODD BLANCHE: Yeah. There's no trick
25 question. I'm not trying to --

1 GHISLAINE MAXWELL: Okay. Yeah.
2 TODD BLANCHE: -- I'm not suggesting that
3 I know the answer to it. I'm generally just asking.
4 GHISLAINE MAXWELL: Well, I would be
5 astonished. I can't imagine they'd have anything in
6 common either.
7 TODD BLANCHE: How about --
8 DIEGO PESTANA: Were you friends with
9 Piers Morgan?
10 GHISLAINE MAXWELL: I've met him. I've
11 met him. I met him at an event in Manhattan. I
12 can't remember what -- in more recently, so probably
13 in 2012, '13, something in that, and we had a very
14 nice conversation. So I remember -- I remember that.
15 I remember thinking -- I'd never -- I
16 don't remember if I'd ever met him before, but I
17 remember thinking how nice he was and I was
18 surprised. So I liked him. What can I tell you?
19 So that's the only one -- that's the only
20 memory I have of that. I'm not sure if that's
21 correct but that's what I think.
22 TODD BLANCHE: I don't have a correct or
23 incorrect answer. I just want you to tell the truth.
24 GHISLAINE MAXWELL: No, I just don't know.
25 I just want to try and...

1 TODD BLANCHE: No, but I don't -- I want
2 you to believe me and -- because I mean this. There
3 is so much information in the public sphere --
4 GHISLAINE MAXWELL: Oh, I see. Okay.
5 TODD BLANCHE: -- about you and
6 Mr. Epstein and others around, and some of it is
7 definitely true and some of it is definitely false --
8 GHISLAINE MAXWELL: Okay. All right. I
9 just -- I guess that's --
10 TODD BLANCHE: -- so when I ask a question
11 --
12 GHISLAINE MAXWELL: Okay.
13 TODD BLANCHE: -- if I think that you're
14 not being honest or that you're missing something,
15 I'm not going to -- this isn't got you.
16 GHISLAINE MAXWELL: Okay.
17 TODD BLANCHE: I'll say that to you.
18 Did you ever meet JFK, Jr.?
19 GHISLAINE MAXWELL: I'm sorry?
20 TODD BLANCHE: Did you ever meet JFK, Jr.?
21 GHISLAINE MAXWELL: Yes.
22 TODD BLANCHE: When was that?
23 GHISLAINE MAXWELL: I will -- I met him at
24 Andrew Cuomo's wedding? No, Kerry -- Kerry's
25 wedding. Kerry's wedding. Who did Kerry marry?

1 Andrew Cuomo. Yes. Sorry.
 2 TODD BLANCHE: Okay.
 3 GHISLAINE MAXWELL: Andrew Cuomo's wedding
 4 in --
 5 TODD BLANCHE: So when would that have
 6 been, approximately?
 7 GHISLAINE MAXWELL: 1990.
 8 TODD BLANCHE: So before --
 9 GHISLAINE MAXWELL: 1999. I don't -- I --
 10 something like that.
 11 TODD BLANCHE: But would that have been
 12 before you met Mr. Epstein?
 13 GHISLAINE MAXWELL: Or maybe -- yes.
 14 TODD BLANCHE: Did you have a -- any sort
 15 of professional or social relationship with John F.
 16 Kennedy, Jr.?
 17 GHISLAINE MAXWELL: I fancied him.
 18 TODD BLANCHE: You what?
 19 GHISLAINE MAXWELL: I thought he was very
 20 attractive.
 21 TODD BLANCHE: Oh, you fancied him.
 22 GHISLAINE MAXWELL: Sorry.
 23 TODD BLANCHE: Besides him -- finding him
 24 attractive and fancying him, did you have any sort
 25 of, you know, social relationship with him?

1 GHISLAINE MAXWELL: I mean, we knew each
 2 other. I thought he was wonderful and fun and I
 3 enjoyed meeting him, but I -- we went out -- I want
 4 to say we had a dinner or two, but obviously I was
 5 very excited, but that was it.
 6 TODD BLANCHE: And then Alan Dershowitz.
 7 GHISLAINE MAXWELL: I -- what's the
 8 question with Alan?
 9 TODD BLANCHE: Do you -- say that again.
 10 GHISLAINE MAXWELL: What's the question?
 11 TODD BLANCHE: Do you know Mr. Dershowitz?
 12 GHISLAINE MAXWELL: Yes.
 13 TODD BLANCHE: Do you know whether he knew
 14 Mr. Epstein? Do you know the nature of their
 15 relationship?
 16 GHISLAINE MAXWELL: Okay. I definitely do
 17 know Alan. I want -- I'm just trying to remember if
 18 I knew him -- I am trying to remember how I met him.
 19 TODD BLANCHE: Okay.
 20 GHISLAINE MAXWELL: -- and if I met him
 21 separate from -- I don't remember.
 22 TODD BLANCHE: Okay.
 23 GHISLAINE MAXWELL: So that I have no
 24 recollection. I remember -- I know that he was
 25 Epstein's lawyer. I don't know if they had any

1 relationship prior to that. I don't remember. Oh, I
 2 do actually. Sorry.
 3 I think they met at the same
 4 Martha's Vineyard through Lynn Forester. I think
 5 that's what happened. I think that's it.
 6 TODD BLANCHE: And why do you think that?
 7 GHISLAINE MAXWELL: Because it just popped
 8 into my head.
 9 TODD BLANCHE: Okay. And did you -- did
 10 you -- you said that Mr. Dershowitz was Mr. Epstein's
 11 attorney.
 12 Do you know whether they also socialized?
 13 GHISLAINE MAXWELL: So my personal memory
 14 of when I remember two -- I have two distinct
 15 memories with Alan. One is with him and his wife at
 16 the island, and I actually remember that. And I
 17 remember, I think, going to his house in Boston, if
 18 he had a house in Boston, that's -- it was only two
 19 times I remember.
 20 TODD BLANCHE: Did you ever observe
 21 Mr. Dershowitz doing anything inappropriate with
 22 young women around Mr. Epstein?
 23 GHISLAINE MAXWELL: Never.
 24 TODD BLANCHE: Did you ever hear
 25 anybody -- did anybody ever tell you that he had done

1 anything inappropriate?
 2 GHISLAINE MAXWELL: Absolutely not.
 3 TODD BLANCHE: Did you ever -- did you --
 4 do you know one way or the other, whether
 5 Mr. Dershowitz ever got a massage at the island or
 6 any of the locations that he was at with Mr. Epstein?
 7 GHISLAINE MAXWELL: I don't remember
 8 anything about him ever getting massaged. I don't
 9 ever have any recoll- -- I don't believe I ever even
 10 saw him in a bathrobe. I have no knowledge of that.
 11 TODD BLANCHE: I'm jumping around a little
 12 bit. You mentioned, I think briefly the TerraMar
 13 Project.
 14 GHISLAINE MAXWELL: Yes.
 15 TODD BLANCHE: What is that?
 16 GHISLAINE MAXWELL: I founded TerraMar
 17 in -- well, the idea of TerraMar came, I think in
 18 2010. So I want to just explain TerraMar a little
 19 bit.
 20 So Ted and I bought a boat -- well, Ted
 21 bought the boat. And its -- basis of the boat was to
 22 do explorations and sea -- sea exploratory stuff.
 23 This really started because I have, and have had
 24 since I was a child, a love of the ocean and
 25 everything aquatic. And I've always been, I just --

1 I'm nervous about the state of the ocean.
 2 When Ted and I, we worked with National
 3 Geographic and we did exploratory work and the most
 4 exciting -- we did many exciting things, but one of
 5 the most fabulous ones that we did was we looked for
 6 Amelia Earhart twice. I did two expeditions to look
 7 for Amelia Earhart, as an example of an -- of a
 8 exploration that we did.

9 And he had a foundation for the ocean and
 10 we worked with Nat Geo, we worked with Woods Hole.
 11 We did amazing things.

12 We bought-- he bought the Remus 6000, so
 13 when the plane went missing, the plane that went --
 14 was it Air France? From Brazil to Paris that went
 15 down, it was the Remus 6000 that found that plane.
 16 It's one of those deep sea explorers.

17 Anyway, when I broke up with Ted, I
 18 just -- one of the things I did not want to give up
 19 was the -- my love of the ocean and everything that
 20 we did and TerraMar, the genesis of TerraMar came
 21 from that. So TerraMar obviously means land, sea.

22 And the story of the ocean is that earth
 23 really shouldn't be called earth, it should be called
 24 ocean because three quarters is the ocean.

25 So -- and so I wanted to not clash with

1 anything to do with Ted, because it was a bit awkward
 2 between us and I -- so he took all the part of the
 3 ocean that was close to land, so within 200 miles.

4 And so I decided I would focus on all the
 5 part of the ocean that was outside of national
 6 borders, TerraMar. And that's how that -- that's the
 7 genesis of TerraMar. Okay.

8 TODD BLANCHE: So what was the time period
 9 of that?

10 GHISLAINE MAXWELL: That -- I think after
 11 I broke up with Ted, so 2010, '11 is when it started.
 12 And then I ran it all the way up until whenever the
 13 Epstein drama struck and then I just shut it down.

14 Not -- I shut it down because I didn't
 15 want what was happening to hurt any -- the
 16 Smithsonian or Nat Geo or the -- I just couldn't let
 17 everything be hurt by what was happening to me.

18 TODD BLANCHE: Do you know Jean-Luc
 19 Brunel?

20 GHISLAINE MAXWELL: Yes.

21 TODD BLANCHE: How do you know him?

22 GHISLAINE MAXWELL: I met him -- so
 23 when -- I told you I was working for the European,
 24 for my dad --

25 TODD BLANCHE: Uh-huh.

1 GHISLAINE MAXWELL: -- and I was in
 2 charge.

3 TODD BLANCHE: So back in like '90, early
 4 '90s?

5 GHISLAINE MAXWELL: Yeah. And I was
 6 running a magazine. One of the things in the
 7 magazine is fashion. And so I was going to some
 8 fashion shows and I was looking for fashion
 9 sponsorship. And in fact, when I came to America,
 10 one of the first sponsors that I got for it was Ron
 11 Perelman at Revlon, who was great. And I met
 12 Jean-Luc through just in Paris like that. But
 13 socially not ...

14 TODD BLANCHE: Did Mr. Epstein know him as
 15 well? Did you later learn whether they knew each
 16 other?

17 GHISLAINE MAXWELL: I'm not sure I -- I
 18 don't -- he would've -- Epstein had his own fashion
 19 situation, so he would've -- I don't -- he didn't
 20 meet Jean-Luc through me.

21 TODD BLANCHE: Did you ever observe them
 22 together over the years?

23 GHISLAINE MAXWELL: Absolutely. Yeah, I
 24 saw them many times together.

25 TODD BLANCHE: Did -- did he visit the

1 island?

2 GHISLAINE MAXWELL: Yes.

3 TODD BLANCHE: Did he go to Palm --
 4 meet -- go to Palm Beach House?

5 GHISLAINE MAXWELL: Yes, he went -- yeah,
 6 he went everywhere. I saw him in every place.

7 TODD BLANCHE: Did do you ever observe him
 8 getting a massage or do you ever know whether they
 9 got a massage? Maybe you didn't observe him
 10 personally? You don't remember.

11 GHISLAINE MAXWELL: I don't know. I mean,
 12 I don't -- I never -- I have no conscious memory of
 13 Jean-Luc. I would imagine that he did, but I
 14 never -- I don't see it.

15 TODD BLANCHE: How about Mr. Weinstein,
 16 Harvey Weinstein?

17 GHISLAINE MAXWELL: What would you like to
 18 know?

19 TODD BLANCHE: Do you know him?

20 GHISLAINE MAXWELL: Yes.

21 TODD BLANCHE: How do you know him? Like,
 22 I guess when I say "how do you know him," is it a
 23 relationship you had kind of separate from
 24 Mr. Epstein or did you guys -- did you meet him
 25 through Mr. Epstein or both?

1 GHISLAINE MAXWELL: I wouldn't say --
2 first of all, I wouldn't say I had any type of
3 relationship with Harvey Weinstein --

4 TODD BLANCHE: Okay.

5 GHISLAINE MAXWELL: -- in any context.
6 Socially, I would meet him because I would
7 go to events that Harvey would be at and also his
8 wife was English back then, Georgina. And I was, I
9 mean, friendly also, would be a big word, more
10 acquaintance.

11 So we would see each other and I would go
12 to Miramax events, be -- there was a couple of people
13 who worked for Harvey who I was friendly with, his
14 primary producer whose name is Meryl Poster, who I
15 was friendly with, and yeah.

16 TODD BLANCHE: Do you know whether
17 Mr. Epstein had his own relationship with
18 Mr. Weinstein?

19 GHISLAINE MAXWELL: He did.

20 TODD BLANCHE: Did they socialize together
21 at the island or in Palm Beach, or in New Mexico?

22 GHISLAINE MAXWELL: I never saw Harvey at
23 any of Epstein's houses. So socialize -- I don't
24 know that they were friends. I mean, I can't see
25 them together, either. I mean, literally.

1 But I know that they certainly do that. I
2 would imagine -- and in fact, I think I have a
3 memory, but I can't -- that when Harvey was trying to
4 raise money for whatever his business was called, I
5 can't remember what his business was called.

6 Maybe he went there, because Epstein was
7 good at raising money. I just don't know. But I
8 never saw them. I don't -- I don't recall seeing
9 Harvey in any of the properties.

10 TODD BLANCHE: Let's just go a few more
11 minutes and take a break, I know it's after lunch.

12 So do you -- we talked several hours ago
13 about your father and his business a little bit.

14 After your father passed, do you know
15 whether Mr. Epstein was involved in your family
16 business, that you know of?

17 GHISLAINE MAXWELL: Absolutely not, in any
18 respect. First of all, there was no family business
19 left. Start with that problem. And the second one
20 is, my family didn't like him very much. And they
21 were busy dealing with their own problems and there
22 was no relationship whatsoever.

23 Oh, I mean, he -- my mum and he got along
24 quite well. That was it. But that was -- she's an
25 old lady and, you know, he was nice to her.

1 TODD BLANCHE: We're repeat -- we're now
2 being a little repetitive, but you're confident that
3 before you met Mr. Epstein, he didn't know your
4 father, and so there's no -- he wouldn't have done
5 business with your father's companies in the '80s
6 either.

7 GHISLAINE MAXWELL: Absolutely not. I'm a
8 hundred percent sure of that. I never met him. I
9 never saw him. I never heard his name. No.
10 Nothing.

11 TODD BLANCHE: So there's been a lot of
12 conversations about whether Mr. Epstein maintained,
13 like, a list of people, like a book of famous people
14 that he knew. Like a, it's called a black book or a
15 client list or a list.

16 Did you know of the existence of any such
17 list?

18 GHISLAINE MAXWELL: There is no list.
19 We'll start with that. The genesis of that story, I
20 can actually trace for you from its absolute
21 inception, if that is what you're interested in.

22 TODD BLANCHE: It is.

23 DAVID MARKUS: Well, first, you know, to
24 be short, there is no list, there's no client list.
25 Nothing like that.

1 GHISLAINE MAXWELL: No, there is nothing
2 like that.

3 TODD BLANCHE: That you know of.

4 GHISLAINE MAXWELL: That I -- obviously.

5 TODD BLANCHE: Right. Yeah. Okay. So
6 you say you think you know the genesis, so go ahead.
7 Tell us.

8 GHISLAINE MAXWELL: I'd like you to know
9 that I have brought some supporting corroborative
10 evidence to --

11 TODD BLANCHE: Well, tell me what it is,
12 too, and then we'll get the corroboration.

13 LEAH SAFFIAN: Well, why don't you tell
14 him first.

15 DAVID MARKUS: Is this -- is this -- do
16 you want to take a break here because this is a
17 long --

18 TODD BLANCHE: It's a long story.

19 GHISLAINE MAXWELL: Yeah, this is long.

20 TODD BLANCHE: Yeah, let's take a break.

21 SPENCER HORN: All right. The time is
22 2:03 and we're going to take a break right now.

23 (Off the record at 2:03 p.m.)

24 SPENCER HORN: All right. We're resuming
25 the recorded proffer of Ms. Maxwell. It is 2:16 on

1 Thursday, July 24th. And the recording device is now
2 on.

3 TODD BLANCHE: So when we stopped to take
4 a break, we were talking about what has been publicly
5 discussed as a black book or the Epstein list. And
6 that's where we are.

7 So you said you think you might know or
8 that you're aware of kind of the origin of this
9 narrative.

10 GHISLAINE MAXWELL: Right. I just want to
11 reiterate again, there is no list that I am aware of.
12 I've never, at any time, at least during the period
13 of time when I was --

14 TODD BLANCHE: Okay.

15 GHISLAINE MAXWELL: -- present.

16 The origin of this story, I believe,
17 begins -- or it has a beginning in 2009, and then it
18 has a prequel but we have to start in 2009.

19 In 2009, there is -- Epstein is, I think,
20 out of jail, and there are civil suits taking place.
21 Many of these are coming out of a disgraced law firm,
22 Rothstein Adler -- Rothstein, Rosenfeldt & Adler.

23 At that law firm is a lawyer who started
24 there in April, May, 2009, called Brad Edwards. In
25 2009, allegedly the FBI gets a call in October of

1 2009 from Brad Edwards, and he allegedly tells them
2 that he has come across a piece of evidence that
3 belongs to Epstein, that contains a list of all of
4 his clients and victims, underage girls, massage
5 therapists, and his -- and the men who are having sex
6 with them. And he becomes -- he, Brad Edwards
7 becomes a cooperating witness -- cooperating --

8 LEAH SAFFIAN: Confidential.

9 GHISLAINE MAXWELL: -- confidential
10 informant, sorry. Confidential informant for them.

11 And in a sting operation obtains the list
12 from a former butler of Epstein's called Alfredo
13 Rodriguez. And it becomes evidence in the civil
14 suit.

15 In the -- Alfredo Rodriguez is
16 subsequently prosecuted for having an AK-47 or
17 something weird, some guns or something, and goes to
18 trial. And there's a criminal complaint that the FBI
19 produced.

20 And in that criminal complaint, it says
21 that Brad Edwards became aware of the list, but --
22 we'll call it the list for the purposes of this.
23 After Alfredo Rodriguez's two depositions that are
24 held in Epstein's civil suit.

25 It's in the FBI's affidavit that the

1 evidence was collected, and Brad Edwards became aware
2 of it after the second deposition. It's in the
3 criminal complaint. The truth is different from
4 what's in both the criminal complaint and in that FBI
5 affidavit, and in Brad Edward's own statements on the
6 subject.

7 The truth is that Alfredo Rodriguez was
8 deposed twice, once in July and once in August. And
9 in the July deposition, told Brad Edwards that he had
10 handwritten notes or a journal, whatever, in the
11 deposition.

12 And Brad Edwards replies, well, we're
13 going to come back for a second deposition. And the
14 second deposition takes place in August.

15 What this means is that Brad Edwards had
16 access to the list from sometime between July and
17 August, until when he actually called the FBI in
18 October. So we're talking six months or so.

19 Rothstein's firm was raided a few days
20 after the list went into the FBI's hands, and,
21 subsequently, Rothstein himself was prosecuted for
22 RICO, and I believe went to jail for 50 years.

23 As part of that RICO case, he admitted to,
24 on the record, and was -- I don't know whether he was
25 prosecuted for creating fake settlements and fake

1 evidence in Epstein's case.

2 In 2009, simultaneously whilst this was
3 going on, my boyfriend, Ted Waitt, was asked for
4 \$10 million to keep me out of any of Epstein's civil
5 suits. Up until then, I had not been in any of
6 Epstein's civil suits. In fact, I wasn't even sure,
7 save for the first time I was mentioned was by
8 [REDACTED], I hadn't been -- I was basically nowhere.

9 And then Ted was called for this
10 \$10 million and had been shown -- his people had been
11 shown evidence that included the list, the flight
12 logs and various other pieces of evidence.

13 Now, we're going to the prequel part of
14 this story, so then it can tie to how this starts.

15 In 2007, Epstein signs the non-prosecution
16 agreement. He then fights the prosecution agreement
17 or debates it through the DOJ or whatever happened
18 there, and is -- goes to the court in 2008, when it's
19 accepted or whatever that is.

20 Villafana was the lead prosecutor or the
21 lead -- yes, in that case. And she, I think, was not
22 happy or with the outcome and utilized, at that time,
23 Brad Edwards, to file the CVRA case.

24 Now, what is -- what I have managed to
25 understand from this is, within the OPR itself, there

1 is evidence. There it says that Brad Edwards was the
2 only lawyer that she was allowed to talk to. So I
3 just want to preface that.

4 The reason why I know that she went behind
5 Acosta's back, and everything else to do this, is
6 because Brad Edwards in a podcast made the
7 revelation. What he says is that he'd never heard of
8 the CVRA case before, and Villafana called him and
9 told him to file it. The sole purpose of the CVRA
10 was to overturn the non-prosecution agreement.

11 So what I believe is that Villafana worked
12 with Brad Edwards, who she had also been -- he was
13 the lawyer that she had selected as a pro bono lawyer
14 for some of the victims. And he was also working for
15 Rothstein's firm, that was under RICO investigation
16 for that entire time, creating fake evidence in
17 Epstein's case.

18 And she had just filed hidden secret using
19 Edwards to overturn the NPA by filing the -- this
20 CVRA case, that sole purpose was to overturn it. And
21 so when he approached her with the list, this was
22 part of the effort to utilize and find new evidence
23 to support the overturning, either of the NPA and/or
24 a new case against Epstein.

25 Because Brad Edwards -- or I don't know it

1 was Brad Edwards. Because Rothstein's firm asked my
2 then boyfriend for \$10 million, to kick me out of
3 suits that I had no knowledge of at that time
4 whatsoever, I now know that the base of this story
5 was a blackmail of a billionaire, because Ted Waitt
6 was a multi-billionaire.

7 He had everything. He was way, way more
8 wealthy than Epstein, if anyone cares. And that is
9 the reason why Ted and I broke up, was the basis of
10 that.

11 TODD BLANCHE: So --

12 GHISLAINE MAXWELL: And that list was
13 created -- so then the -- the masseuses that were on
14 that list, I have never heard of some of them. I --
15 not even from the civil suits that had come up since
16 I've seen it. And this is me now knowing what's in
17 the list today.

18 And I believe that -- oh, Alfredo
19 Rodriguez, so there's a metamorphosis of this list.
20 So the original statement that Brad Edwards makes,
21 that's in the documents contemporaneously, is that
22 it's pieces of paper that Alfredo has.

23 It then morphs into something that Alfredo
24 took a book, that Alfredo took from Epstein's
25 computer, but there's no computer I know. Certainly

1 not in 2005 when this was allegedly taken, that came
2 out as a book.

3 And then it morphed into, at the civil
4 time -- my civil case, into a book that was taken
5 from my computer. And then it morphed into the
6 Southern District of New York as a combination list
7 of mine and Epstein's. That is a metamorphosis
8 through documents that you can trace.

9 TODD BLANCHE: So the -- in your mind, or
10 from what you just described, there is a list, it's
11 just manufactured. Meaning, have you seen the list,
12 even fake? Like do you know --

13 GHISLAINE MAXWELL: I haven't seen it, but
14 what I --

15 TODD BLANCHE: So just -- I was confused
16 --

17 GHISLAINE MAXWELL: So I guess my thing is
18 that what Brad Edwards says in all of these things
19 is -- in the paperwork and whatnot. And in -- so all
20 this story is basically controlled by five people.

21 There's four alleged victims that speak
22 about the list and the blackmail and the men and the
23 sex and whatnot -- And the lawyers and now the
24 prosecutors, sorry. The Southern District of
25 New York for sure. But no one else.

1 None of these stories carry from any of
2 the 44, alleged, original victims. They never ever
3 say that they were farmed out to anybody.

4 TODD BLANCHE: But the list itself --

5 GHISLAINE MAXWELL: Yes.

6 TODD BLANCHE: -- where is it?

7 GHISLAINE MAXWELL: There is no list, but
8 Brad Edwards said that he created the list.

9 TODD BLANCHE: So that's what I was a
10 little confused about.

11 GHISLAINE MAXWELL: Sorry. He created a
12 list. He -- so in that book that Alfredo Rodriguez
13 produced, that became evidence, Exhibit 52 in my
14 trial, has markings all over it. Circles and dots
15 and whatnot.

16 TODD BLANCHE: Uh-huh.

17 GHISLAINE MAXWELL: And Brad Edwards says
18 that he got Alfredo Rodriguez to mark up the book of
19 all the people who were involved. It includes Alan
20 Dershowitz, for the record, who's marked. I don't
21 remember what it does with Donald Trump. I don't --
22 I don't know. You'd have to look. I don't have it.

23 But I believe --

24 TODD BLANCHE: I see.

25 GHISLAINE MAXWELL: So what he did, he

1 marked up -- I don't know who. Somebody marked up
2 that book of names, and I think all the names of the
3 people that they went for were originally selected
4 between two sources. One was this alleged book of
5 names, and one was also from the telephone logs that
6 were collected from the house in Palm Beach.

7 And just to finish it off, there is a
8 note -- I have some papers for you if you wanted
9 them, where Brad Edwards says that he has a list of
10 25 men that he got money off --

11 TODD BLANCHE: So -- okay. So the list
12 that everybody, the black book, the list, what you're
13 saying is that your -- your Exhibit 52 from your
14 trial, which is like a -- more of an address book, a
15 Rolodex type thing, that Mr. Rodriguez -- Alfredo
16 Rodriguez, your understanding, is that somewhere
17 along the way he went through and kind of marked that
18 list to say --

19 GHISLAINE MAXWELL: I don't know where
20 that book actually comes from.

21 TODD BLANCHE: Okay.

22 GHISLAINE MAXWELL: I don't know what that
23 book is. That book is some type of a compilation,
24 but what it is, is it's just pieces of paper with
25 type. So if you had -- you could have made a list.

1 I could put --

2 TODD BLANCHE: But you're referring to
3 something that's been public for a long, if we're
4 thinking about the same thing. You're talking about
5 the -- you're right, it's like a bunch of different
6 types of paper or whatever. I only have a copy of
7 it, but with big parts of it redacted publicly,
8 because there was people's addresses and whatnot on
9 it.

10 GHISLAINE MAXWELL: Yes. That's what I'm
11 talking about.

12 TODD BLANCHE: Okay.

13 GHISLAINE MAXWELL: So it -- oh, perfect.
14 Yes. So you will find --

15 TODD BLANCHE: We're looking at Exhibit 52
16 now.

17 GHISLAINE MAXWELL: Okay. So you're
18 looking at Exhibit 52. So the one they produced,
19 they, the Southern District of New York actually
20 produced a book for me to see it as evidence, the
21 actual thing it was.

22 And I -- it has marks, it has tabs, it has
23 things, it has names I've never seen. It had -- like
24 that list -- those -- that list was basically the
25 names that they choose to produce at trial. Now, in

1 Rothstein Adler's firm, I also have some documents
2 where Rothstein -- his original scheme, Rothstein
3 Adler, was to place prostitutes. He had a bar, a
4 dance bar where he had girls. And I believe he would
5 use them and put them as fake secretaries in people's
6 offices, and then she might touch him or he might
7 touch her or something, and boom, he got \$25,000 for
8 that.

9 And those girls --now, I'm not saying that
10 those are the girls that came in Epstein's case
11 necessarily, but the --

12 TODD BLANCHE: So -- but again, let's --
13 like, so we're separating the evidence that came in
14 at your trial and what you just talked about with
15 Brad Edwards and Mr. Rodriguez.

16 During the time that you were with
17 Mr. Epstein, and even in the 2000s when you were
18 around less frequently, you never observed or you
19 never saw any sort of list or black book or a list of
20 individuals who, you know, linked to certain
21 masseuses or --

22 GHISLAINE MAXWELL: Absolutely no.

23 TODD BLANCHE: -- anything like that?

24 GHISLAINE MAXWELL: Absolutely no. There
25 is no list. There is no -- I'm not aware of any

1 blackmail. I never heard that. I never saw it and I
2 never imagined it.

3 TODD BLANCHE: While we're on this topic,
4 just -- and again, I know we're jumping around and
5 we've been going on it for a while, so I apologize.

6 But there's recently been reports about a
7 birthday book that you assembled for Mr. Epstein, I
8 think, for his 50th birthday in 2003.

9 GHISLAINE MAXWELL: That's true.

10 TODD BLANCHE: What do you know about
11 that?

12 GHISLAINE MAXWELL: So, my mum did a
13 birthday book for my father at his 60th. And when
14 I -- Epstein would talk about his 50th, he said, I
15 don't know what I'm going to do. And I said, well,
16 these are nice things, my mom did this book for my
17 dad. He said, I love that idea.

18 He said, can you help coordinate it? And
19 he organized who -- he called a lot of the people
20 himself. I coordinated the putting together of the
21 book. And some -- in some instances, I called people
22 that asked them to contribute --

23 TODD BLANCHE: And what was in the book?
24 Like what was the ask of the people you called?

25 GHISLAINE MAXWELL: It's his 50th

1 birthday, say anything you want on a piece of paper.
 2 TODD BLANCHE: Yeah. Okay.
 3 GHISLAINE MAXWELL: I mean, nothing more
 4 than that.
 5 TODD BLANCHE: Right. I mean, it was an
 6 obvious question. But you basically -- his folks
 7 were invited to send something to you to celebrate
 8 his birthday.
 9 GHISLAINE MAXWELL: Yes. To say happy
 10 birthday with like, have a wonderful day or something
 11 else. There was no -- there was no ask, but I wasn't
 12 responsible for everybody in that book. And there
 13 were people that he would ask himself to contribute.
 14 TODD BLANCHE: And do you remember some --
 15 do you remember specific names of individuals who did
 16 send letters or who did contribute?
 17 GHISLAINE MAXWELL: It's been so long. I
 18 want to tell you, but I don't remember.
 19 TODD BLANCHE: Do you --
 20 GHISLAINE MAXWELL: I honestly don't
 21 remember.
 22 TODD BLANCHE: The article talks about
 23 several names, but including the folks -- the
 24 article, which is on Donald Trump. Do you remember
 25 President Trump submitting a letter or a card or a

1 note?
 2 GHISLAINE MAXWELL: I don't.
 3 TODD BLANCHE: Do you think the
 4 articles -- well, do you remember seeing that book or
 5 any portion of the letters in your discovery in
 6 New York?
 7 GHISLAINE MAXWELL: Yes.
 8 TODD BLANCHE: Okay. What do you remember
 9 seeing?
 10 GHISLAINE MAXWELL: I remember there
 11 was -- there were some portions of that book. But
 12 what surprised me -- yeah. What surprised me was how
 13 few there were, because I thought if you had those,
 14 where are the rest? There was none of Mr. Trump.
 15 TODD BLANCHE: In your discovery?
 16 GHISLAINE MAXWELL: Oh, in my discovery,
 17 sorry. President Trump, there was nothing from
 18 President Trump.
 19 TODD BLANCHE: And do you remember -- but
 20 separate and apart from your discovery, do you
 21 remember one way or the other whether President Trump
 22 submitted a letter for his 50th birthday?
 23 GHISLAINE MAXWELL: I do not remember.
 24 TODD BLANCHE: And the article that
 25 references the letter talks about like a -- sounds

1 like either a naked -- a picture of a naked woman or
 2 something like that.
 3 Do you have any recollection of that?
 4 GHISLAINE MAXWELL: I do not. But just --
 5 no, I don't.
 6 TODD BLANCHE: Do you remember -- so what
 7 do you remember seeing from your discovery around the
 8 book? Like you said, portions of it or some of the
 9 pages.
 10 What do you remember.
 11 GHISLAINE MAXWELL: I remember there were
 12 maybe -- so I just want to say about the discovery
 13 that I had about -- maybe this is an exaggeration,
 14 I'm not sure, but in my mind it's about close to 5
 15 million page -- 5 million documents. It was a lot.
 16 And of that giant document dump that I
 17 received, I was only -- maybe as much as 30 to 35
 18 percent, I was never able to access. And this is
 19 documented on -- at the court. And so I cannot say
 20 that I saw everything, because I didn't.
 21 TODD BLANCHE: Yeah. Okay.
 22 GHISLAINE MAXWELL: I just want you to
 23 know that. And I think that that was by design.
 24 TODD BLANCHE: But you -- but you do
 25 remember --

1 GHISLAINE MAXWELL: I do remember some
 2 pages.
 3 TODD BLANCHE: -- seeing some pages of the
 4 book?
 5 GHISLAINE MAXWELL: I do, yes.
 6 TODD BLANCHE: Okay. Do you remember what
 7 pages you saw? Like from -- it was from -- who had
 8 written those letters or no?
 9 GHISLAINE MAXWELL: I really don't
 10 remember. I'm sorry.
 11 TODD BLANCHE: Okay. It's okay. Did you
 12 -- did you and/or -- so the same questions we've
 13 asked about some other individuals.
 14 Did you have -- did you meet Bill Gates
 15 over the years?
 16 GHISLAINE MAXWELL: Yes.
 17 TODD BLANCHE: Because of your
 18 relationship with Mr. Epstein or separate?
 19 GHISLAINE MAXWELL: That one -- well, I
 20 met Mr. Gates -- I went to the TED conference. I
 21 gave -- I went to the TED conference and I actually
 22 spoke at the TED Conference, not the main stage, the
 23 substage. And I also gave several TEDx's.
 24 But -- and I met him there, but we were
 25 friendly and I actually did meet him, because I knew

1 his -- I don't know if he was chief of staff or
2 whoever, Boris. And I met him, I think, once. I may
3 have met him actually at 71st Street. I may have
4 once. I don't remember if I met him there or at a
5 restaurant, I don't remember. And that would've been
6 because of Epstein, because Epstein was friendly with
7 Boris and Boris -- that's all I remember.

8 TODD BLANCHE: Do you know whether
9 Mr. Gates traveled with Mr. Epstein on his plane to
10 any of his houses?

11 GHISLAINE MAXWELL: So if that -- that
12 friendship was after, you know, it was in the late
13 2000s. So if I met him -- like I said, I went to
14 Epstein's house maybe once or twice. Maybe I met him
15 there. I don't remember.

16 TODD BLANCHE: So you don't --

17 GHISLAINE MAXWELL: So I wouldn't know if
18 he had been on Epstein's plane.

19 TODD BLANCHE: And you weren't -- you
20 don't recall ever being on the plane with him flying
21 to the island or to anywhere?

22 GHISLAINE MAXWELL: No.

23 TODD BLANCHE: Do you know somebody named
24 Reid Hoffman?

25 GHISLAINE MAXWELL: I do.

1 TODD BLANCHE: Who's that?

2 GHISLAINE MAXWELL: Reid is a Silicon
3 Valley guy.

4 TODD BLANCHE: Is what?

5 GHISLAINE MAXWELL: Silicon Valley.

6 TODD BLANCHE: And how do you know him?

7 GHISLAINE MAXWELL: Through my friends in
8 San Francisco. I have a -- I used to have a very
9 close friend who is in San Francisco who's part of
10 that whole -- I have several, actually, or had.

11 TODD BLANCHE: So is that a relationship
12 you had kind of separate and apart from Mr. Epstein?

13 GHISLAINE MAXWELL: Separate.

14 TODD BLANCHE: Do you know whether
15 Mr. Epstein had a relationship with Reid Hoffman?

16 GHISLAINE MAXWELL: I don't know.

17 TODD BLANCHE: Did you ever observe
18 Mr. Hoffman flying anywhere with you or Mr. Epstein?

19 GHISLAINE MAXWELL: No.

20 TODD BLANCHE: Or getting massages?

21 GHISLAINE MAXWELL: No. No.

22 TODD BLANCHE: So there was -- there's a
23 list of multiple masseuses that is floating around.
24 I think you had in your discovery. I think you were
25 just talking about that.

1 That list, do you know how that list was
2 created?

3 GHISLAINE MAXWELL: No. That -- all that
4 stuff that came out of that book, I now find suspect.

5 TODD BLANCHE: As far -- as part of the
6 story you just told us?

7 GHISLAINE MAXWELL: Yes. Now, I'm not
8 saying it's all fake. I don't know what's real and
9 what's not. I don't --

10 TODD BLANCHE: Understood.

11 GHISLAINE MAXWELL: -- know what name is
12 true. Now that it's been to my mind anyway, now that
13 it has been, without a doubt, contaminated and
14 possibly fraudulent, I'm not -- I don't know. I
15 mean, obviously the numbers that I recognize are my
16 own, those are real.

17 But how it was actually ended up put
18 together and compiled and the purposes for it, for
19 which then they blackmailed my boyfriend, now I'm
20 just -- no.

21 TODD BLANCHE: Over the years when you
22 were serving as like the general manager, so the mid
23 '90s all the way into the 2000s. Did you or do you
24 know whether anyone maintained a list of all the
25 masseuses, like a running list?

1 GHISLAINE MAXWELL: So there would've --
2 so there's two things -- well, three ways. So I know
3 that the house itself, John Alessi had a Rolodex that
4 he kept the names and numbers of all the people that
5 came to the house so that he could call.

6 So --because I only was with Epstein, even
7 at best, half the time. So when I was there, he had
8 like his chief of staff who could find whatever he
9 needed. And when I wasn't there, he had to rely on
10 somebody else, right? So it'd be that John Alessi or
11 whoever else.

12 So everybody -- whoever was traveling with
13 him or wherever he was, he needed somebody else to
14 access information. So he had an assistant chief who
15 was his secretary, who would be the one that would
16 update his computer, you know, like everybody has an
17 address book.

18 TODD BLANCHE: But was what you're
19 describing, which I'm not -- it makes sense. I'm
20 just -- was that a list of masseuses or a list of
21 people that might need to be contacted, which would,
22 necessarily, include a lot of masseuses?

23 GHISLAINE MAXWELL: That's -- the latter.

24 TODD BLANCHE: And did you update that?
25 Like were you part of -- were you one of the people

1 that would add names to it? Like if a masseuse came
 2 and leaves and Mr. Epstein says yes, she was good,
 3 would you be part -- like, how, how was the list kind
 4 of maintained or who maintained it?
 5 GHISLAINE MAXWELL: Typically, no --
 6 TODD BLANCHE: No.
 7 GHISLAINE MAXWELL: -- because there would
 8 be an assistant who would do that. Plus, Epstein
 9 would not allow me to answer the telephone ever. So
 10 -- or maintain or keep any of his messages in the
 11 office or at the house.
 12 So typically that wouldn't be, because I
 13 wouldn't be the one. Could I say to you I never did
 14 it? No, of course not. Because that just seems
 15 ludicrous. But as a rule of thumb, the answer would
 16 be no.
 17 TODD BLANCHE: During the 2007, '08, '09,
 18 investigation -- the investigation out of the
 19 Southern District of Florida. So you said that you
 20 weren't contacted by law enforcement.
 21 GHISLAINE MAXWELL: I was not.
 22 TODD BLANCHE: After Mr. Epstein was
 23 charged, did you have conversations with him about
 24 the investigation?
 25 GHISLAINE MAXWELL: He never talked to me

1 about it.
 2 TODD BLANCHE: Did you --
 3 GHISLAINE MAXWELL: I mean, I can't --
 4 let's put it this way. If he did, I have no
 5 recollection of it. I mean, I'm sure he must have
 6 said, this is all -- whatever he said or it's nothing
 7 or whatever.
 8 I mean, I just don't have any -- I just
 9 don't have any memory. I mean, I just -- I was with
 10 Ted. My -- I was like gone. I mean, plus I just
 11 didn't want to know either, I suppose.
 12 TODD BLANCHE: So you don't know,
 13 firsthand, why the U.S. Attorney in Florida made the
 14 deal that he did? Meaning you weren't part of that
 15 discussion along the way.
 16 Like Mr. Epstein didn't say, I'm getting a
 17 good deal or, you know, I -- something is happening
 18 with the case that's very good.
 19 You were -- to the extent you know
 20 anything about it, it's just from what you've heard
 21 or read from others, not from Mr. Epstein; is that
 22 right?
 23 GHISLAINE MAXWELL: He never talked about
 24 the non-prosecution directly with me, no. But he did
 25 --

1 DAVID MARKUS: But it's still enforceable
 2 as to her.
 3 GHISLAINE MAXWELL: I mean, he never said,
 4 hey, do you -- are you happy with this deal like
 5 that. But I understood. He never -- he never
 6 enjoined me to the NPA, but I understand that he
 7 included me, specifically, and I'll tell you why.
 8 DAVID MARKUS: Well, it's okay. You don't
 9 need to get into that.
 10 TODD BLANCHE: No, no. Yeah. I'm not --
 11 I don't want to talk about the legal -- the -- what's
 12 on appeal. I'm just --
 13 GHISLAINE MAXWELL: No. I -- well, I
 14 wasn't.
 15 TODD BLANCHE: The reason for my question,
 16 just to be -- I'm not trying to hide something, but
 17 there's a very strong belief that he got a very good
 18 deal. And that he should -- she -- he should have
 19 been sentenced to more time or got a different
 20 sentence from the feds than a non-prosecution
 21 agreement.
 22 And I'm not asking you to opine on that,
 23 but I'm wondering whether he ever talked to you about
 24 that. But it sounds like he didn't.
 25 GHISLAINE MAXWELL: That he got a good

1 deal. No. I think actually -- well, his comments
 2 that I've read was that he didn't get a good deal.
 3 And I think that the, you know, when he fought it so
 4 hard is because he didn't think he did.
 5 TODD BLANCHE: When he was serving his
 6 sentence, were you ever -- were you around during
 7 that time, like when he was allowed to leave during
 8 the day or travel during the day?
 9 GHISLAINE MAXWELL: I never called him. I
 10 never saw him and I never went to the jail.
 11 TODD BLANCHE: So I'm going to ask you
 12 questions that you shouldn't read into them. I just
 13 want to know whether you -- whether they resonate
 14 with you.
 15 Have you ever had any contact with any
 16 representative, that you know of, from Mossad, the
 17 Israeli intelligence agency.
 18 GHISLAINE MAXWELL: Can you ask me that
 19 again.
 20 TODD BLANCHE: Has -- have you ever had
 21 any contact with an individual that you understand to
 22 be from Mossad, an Israeli intelligence agency?
 23 GHISLAINE MAXWELL: Well, not
 24 deliberately.
 25 TODD BLANCHE: Pardon me?

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1 GHISLAINE MAXWELL: Not deliberately.
 2 TODD BLANCHE: Okay. And did you know --
 3 we asked this -- we talked about this a little bit
 4 earlier, but just to put a finer point on it. Did
 5 you ever know that Mr. -- did you ever -- were you
 6 ever told -- did you ever think that Mr. Epstein was
 7 getting any money from any intelligence agency,
 8 including Mossad?
 9 GHISLAINE MAXWELL: Well, I don't believe
 10 so, but I wouldn't know. I mean, I would be very
 11 surprised if he did. I don't think so. No.
 12 TODD BLANCHE: We've talked about a lot of
 13 names and I'm sure we've -- there's some that we
 14 haven't covered. Are there any foreign nationals --
 15 so right now we've talked about some British, the
 16 Royal Family a little bit, and maybe high society
 17 folks in Britain.
 18 Were there any international businessmen
 19 or politicians that had a very close relationship or
 20 a close relationship with Mr. Epstein, that we
 21 haven't already talked about?
 22 GHISLAINE MAXWELL: Off the top of my,
 23 head, I can think of Ehud Barak.
 24 TODD BLANCHE: You said that Mr. Epstein
 25 at some point in the mid to late '90s he started

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1 taking testosterone. Did you ever know him to take
 2 any other drugs?
 3 GHISLAINE MAXWELL: No. I mean, he took
 4 pills for his heart, I think, but I don't -- no
 5 other -- no substances.
 6 TODD BLANCHE: What -- do you know
 7 anything about his heart condition? I know we talked
 8 about this at, you know, 9:45 this morning. But do
 9 you know anything about his heart condition, beyond
 10 that you understood he had a heart condition that
 11 affected his ability to have sex?
 12 GHISLAINE MAXWELL: Other than what he
 13 told me, no. He never shared anything, but he did
 14 take pills. I don't know what -- I don't know
 15 anything above that. And like I said, he did the
 16 testosterone, which made him mean.
 17 TODD BLANCHE: And we're jumping around a
 18 little bit.
 19 GHISLAINE MAXWELL: Sorry.
 20 TODD BLANCHE: Sorry. Do you know someone
 21 named Donald Barr?
 22 GHISLAINE MAXWELL: No.
 23 TODD BLANCHE: He is -- I can represent to
 24 you, was a former headmaster of the Dalton School,
 25 which you mentioned earlier.

1 GHISLAINE MAXWELL: All right.
 2 TODD BLANCHE: Do you remember any
 3 conversations with Epstein about a book that Mr. Barr
 4 wrote called Space Relations?
 5 GHISLAINE MAXWELL: I've never heard of
 6 that.
 7 TODD BLANCHE: About aliens and sex?
 8 GHISLAINE MAXWELL: Okay. No.
 9 TODD BLANCHE: Do you know whether --
 10 well, have you ever met the former Attorney General
 11 of the United States Bill Barr?
 12 GHISLAINE MAXWELL: No.
 13 TODD BLANCHE: Do you remember whether
 14 Mr. Epstein knew him or whether his name ever came up
 15 in conversations you had with Mr. Epstein?
 16 GHISLAINE MAXWELL: I don't recall any.
 17 TODD BLANCHE: Okay. Did you have a
 18 relationship or know -- I'm using "relationship," but
 19 I appreciate you don't like that word.
 20 Do you have -- did you know Mr. Epstein's
 21 brother Mark Epstein?
 22 GHISLAINE MAXWELL: Yes.
 23 TODD BLANCHE: How did you know him?
 24 GHISLAINE MAXWELL: Through Jeffrey.
 25 TODD BLANCHE: How would you describe your

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1 relationship; close, friendly?
 2 GHISLAINE MAXWELL: My personal?
 3 TODD BLANCHE: Yes.
 4 GHISLAINE MAXWELL: Not that close, but
 5 friendly enough. I mean, you know.
 6 TODD BLANCHE: How was Jeffrey Epstein's
 7 relationship with his brother Mark from what you
 8 observed?
 9 GHISLAINE MAXWELL: I mean, they were
 10 brotherly, but I think that -- I don't know. I don't
 11 know. They had periods when they were closer and
 12 then when they weren't. I think sometimes Epstein
 13 found his brother irritating.
 14 TODD BLANCHE: And I think I know the
 15 answers, given what you just said about Bill Barr,
 16 but did you ever hear any -- from Mr. Epstein or
 17 anybody else -- that Bill Barr had any role in
 18 Mr. Epstein getting a good plea deal in Florida, or
 19 any role in that process with Mr. Acosta?
 20 GHISLAINE MAXWELL: I never heard that.
 21 TODD BLANCHE: I think you said this in an
 22 interview, but if I'm wrong forgive me. Do you have
 23 a view of Mr. Epstein of whether he committed suicide
 24 or whether something else happened?
 25 DAVID MARKUS: Can we take a break?

1 TODD BLANCHE: Want to take a break?
 2 DAVID MARKUS: Yeah, sure.
 3 TODD BLANCHE: Yeah. We can take a break.
 4 Yeah. Sure. Actually, it's a good time to take a
 5 break anyway, because it's to be the last one of the
 6 day.
 7 SPENCER HORN: All right. So we're going
 8 to take a break at -- it's 2:53, Thursday, July 24th.
 9 (Off the record at 2:53 p.m.)
 10 SPENCER HORN: We are continuing with the
 11 recorded proffer of Ms. Maxwell. The time is now
 12 3:10 p.m., Thursday, July 24th.
 13 TODD BLANCHE: My colleagues alerted me to
 14 a couple questions I think I may have forgotten to
 15 ask you. One is -- sorry, I'm just going through my
 16 notes.
 17 Well, we talked few minutes ago about this
 18 birthday book that there's press about. I understand
 19 you don't remember anything with President Trump or a
 20 lot about the book anyway.
 21 Do you remember asking President Trump to
 22 submit a letter for that?
 23 GHISLAINE MAXWELL: I do not.
 24 TODD BLANCHE: And do you remember --
 25 would you have been the one to do that or could

1 somebody else -- would somebody else have done that?
 2 GHISLAINE MAXWELL: I did ask some people.
 3 I don't remember Mr. Trump. I don't remember who I
 4 did ask, but Epstein also asked people himself
 5 directly.
 6 TODD BLANCHE: Okay.
 7 GHISLAINE MAXWELL: So it could have
 8 happened that way, if it happened at all.
 9 TODD BLANCHE: Where is that?
 10 DIEGO PESTANA: You mentioned Ehud Barak.
 11 GHISLAINE MAXWELL: Yes.
 12 DIEGO PESTANA: What was his involvement?
 13 GHISLAINE MAXWELL: This would've been in
 14 the later 2000's. So I do not know how they met, but
 15 I do know that they -- I don't know if friendly would
 16 be the right word. I don't know that, but I know
 17 that they saw each other and only because my
 18 father -- you know, anything that touches Israel or
 19 the state of Israel, I'm always interested in,
 20 because my father loved Israel and so I pay attention
 21 to it and we have ties to, you know, to Israel.
 22 TODD BLANCHE: When you said it was later
 23 though --
 24 GHISLAINE MAXWELL: Ties meaning friends
 25 and family relations.

1 TODD BLANCHE: Was the Prime Minis- was
 2 Mr. Barak, Prime Minister Barak, do you know what the
 3 nature of his relationship was with Mr. Epstein?
 4 GHISLAINE MAXWELL: I don't.
 5 TODD BLANCHE: Do you know -- were you
 6 ever with them together?
 7 GHISLAINE MAXWELL: I think I met -- I
 8 have a memory of meeting Ehud, but I don't know if he
 9 was with Epstein or -- I don't remember. I just know
 10 that I did see him and I'm trying -- struggling to
 11 remember the context around it, but if I -- if -- I'm
 12 sure it happened, but it must have been very brief.
 13 Because I don't have any serious memory of it. Any
 14 like, deep memory of that.
 15 TODD BLANCHE: And maybe this is
 16 obvious --
 17 GHISLAINE MAXWELL: And maybe it comes
 18 also because I've read it in the press. That may be
 19 something that brought it to my memory. So that's
 20 also -- I mean, I'm also -- I think the press has
 21 been very contaminating, so I just -- it's hard
 22 sometimes to separate those stories from your memory
 23 sometimes.
 24 TODD BLANCHE: Do you know a British
 25 gymnast by the name of Heather Mann?

1 GHISLAINE MAXWELL: Yes.
 2 TODD BLANCHE: Did she --
 3 GHISLAINE MAXWELL: I didn't know she was
 4 a gymnast.
 5 TODD BLANCHE: Oh, okay. I'm reading
 6 something that says she was a gymnast, but please
 7 don't assume that that's correct. This is based upon
 8 my words.
 9 GHISLAINE MAXWELL: Okay.
 10 TODD BLANCHE: Did she ever travel with
 11 you and/or Mr. Epstein?
 12 GHISLAINE MAXWELL: I think, yeah, she did
 13 actually. I think that she might have been one of
 14 Mr. Epstein's girlfriends at some point.
 15 TODD BLANCHE: What -- again, I know we're
 16 talking about time periods that are vast. What time
 17 period would that have been? Like after you --
 18 like since 2000?
 19 GHISLAINE MAXWELL: I want to say -- I
 20 don't know, it could be the '90s -- could be the
 21 '90s, I don't know. But I mean, listen, there are
 22 people that pop out of the woodwork all the time. I
 23 just saw one on TV saying she was his girlfriend in
 24 '93 and '94. So I mean, he obviously was very busy.
 25 LEAH SAFFIAN: Or she's lying.

1 GHISLAINE MAXWELL: Or there's that.
 2 TODD BLANCHE: Did - someone named Mark
 3 Middleton --
 4 GHISLAINE MAXWELL: Yes, I remember him.
 5 TODD BLANCHE: Who was that?
 6 GHISLAINE MAXWELL: He was in the --
 7 Mr. Clinton's administration -- President Clinton's
 8 administration, I think.
 9 TODD BLANCHE: And how do you -- do you
 10 know him?
 11 GHISLAINE MAXWELL: Well, I met him and
 12 that is -- I met him through Mr. Epstein.
 13 TODD BLANCHE: And do you -- was he, from
 14 what you observed, was he a friend or business
 15 acquaintance of Mr. Epstein?
 16 GHISLAINE MAXWELL: I mean, I only saw him
 17 a handful of times, but I did see him with him. I
 18 mean, he seemed friendly. I don't know if I would
 19 characterize -- I mean, only having seen him briefly,
 20 I don't know how to characterize that.
 21 TODD BLANCHE: Do you know whether he like
 22 flew on airplanes with Mr. Epstein? Did he visit the
 23 island? Do you know anything about that or their
 24 relationship as it relates to that?
 25 GHISLAINE MAXWELL: I never -- I don't

1 have any recollection of seeing Mark Middleton at the
 2 island.
 3 TODD BLANCHE: How about former US Senator
 4 George Mitchell?
 5 GHISLAINE MAXWELL: Yeah, I do remember
 6 George.
 7 TODD BLANCHE: What do you remember about
 8 him?
 9 GHISLAINE MAXWELL: I traveled with him.
 10 We went to -- the most memorable affair I went to --
 11 well, I was friendly with his wife. Start with that,
 12 with Heather. And Heather was in New York, so I hung
 13 out with her a few times. We had dinner and I was
 14 just friendly, I would say separately with --
 15 separately from her husband. I was friends with
 16 Heather. I met Heather through her husband, but we
 17 became friends.
 18 TODD BLANCHE: You became friends with
 19 Heather?
 20 GHISLAINE MAXWELL: Heather, yes.
 21 TODD BLANCHE: Was Mr. Epstein friends
 22 with, Mr. Mitchell?
 23 GHISLAINE MAXWELL: Yes.
 24 TODD BLANCHE: Did they travel together
 25 besides New York? Did they travel to the island or

1 to New Mexico?
 2 GHISLAINE MAXWELL: I don't -- I don't
 3 remember George ever at the island. But the most
 4 memorable trip I do recall with Senator was to Italy.
 5 TODD BLANCHE: Was to where?
 6 GHISLAINE MAXWELL: To Italy.
 7 TODD BLANCHE: Ah, okay.
 8 GHISLAINE MAXWELL: We went to Rome.
 9 TODD BLANCHE: As the four of you. So
 10 Heather and Mr. Mitchell, and you and Mr. Epstein?
 11 GHISLAINE MAXWELL: That's my
 12 recollection.
 13 TODD BLANCHE: And what were you there
 14 for?
 15 GHISLAINE MAXWELL: Well, the most
 16 memorable aspect of that trip is we went to the
 17 Vatican. It was extraordinary, the most
 18 extraordinary thing was going to the archives and
 19 holding Henry VIII's document to the Pope asking for
 20 his divorce.
 21 TODD BLANCHE: Do you know the former
 22 president of Colombia, Andr?s Pastrana?
 23 GHISLAINE MAXWELL: Yes.
 24 TODD BLANCHE: How do you know him?
 25 GHISLAINE MAXWELL: I met Andr?s Pastrana

1 in a pub in Dublin.
 2 TODD BLANCHE: And did he travel with
 3 Mr. Epstein, that you know?
 4 GHISLAINE MAXWELL: I don't -- I don't
 5 know if -- I don't know if he ever was ever on the
 6 plane. I don't know if he ever -- I don't think he
 7 ever came to the island. But, I went to places with
 8 Andr?s Pastrana. One was to Colombia and Epstein
 9 came to that, and the other was to Cuba and Epstein
 10 and Andr?s Pastrana was -- I think was there.
 11 TODD BLANCHE: And what were the purposes
 12 of traveling to Colombia, then Cuba?
 13 GHISLAINE MAXWELL: I am a helicopter
 14 pilot and Andr?s is a helicopter pilot. And we just
 15 became friends and I flew a Blackhawk in Colombia.
 16 TODD BLANCHE: And how about to Cuba?
 17 GHISLAINE MAXWELL: My -- I have a friend
 18 of mine who was the cigar distributor for Montecristo
 19 maybe, I can't remember which cigar it was. And so
 20 we went there, and he organized the trip and we met
 21 Fidel Castro.
 22 TODD BLANCHE: When was that,
 23 approximately?
 24 GHISLAINE MAXWELL: Had to be -- it had to
 25 be 2002, 2003.

1 TODD BLANCHE: Okay.
2 GHISLAINE MAXWELL: Something like that, I
3 think.

4 TODD BLANCHE: There's some more names
5 that we might talk about tomorrow with the same type
6 of questions, just -- but as far as a catchall,
7 there's been a tremendous amount of public
8 information about all kinds of names, including some
9 of the folks we talked about today and their
10 relationship with Mr. Epstein and or you.

11 For any of the folks that we've talked
12 about today, did you observe them doing anything
13 improper with Mr. Epstein, whether with masseuses or
14 with women who were -- or girls who were traveling or
15 at the residence that they were at or at the parties
16 that they were at?

17 GHISLAINE MAXWELL: I did not ever, at any
18 time, see that.

19 TODD BLANCHE: And for any of the names
20 we've talked about today, and then tomorrow we'll
21 talk about some more, but for today, do you recall
22 having any conversations with anybody else, where
23 they reported to you that they had seen something
24 that one of these individuals had done, whether
25 someone else that works with Mr. Epstein or somebody

1 that observed something?

2 GHISLAINE MAXWELL: If anybody had ever
3 reported anything -- first of all, the answer to that
4 is no. And also, I just want to be clear that had
5 anybody ever reported anything illegal or disgusting
6 like that, I would've immediately done something.
7 And I never heard it. I never saw it. And no one
8 ever, ever, ever complained to me or tears, nothing
9 like that.

10 TODD BLANCHE: Okay. All right. So we
11 took a break when we were talking about Mr. Epstein
12 and his death. Oh, bless you. That's okay. Take
13 your time.

14 So Mr. Epstein and his death. So you were
15 not, obviously, at the MCC during that time, correct.

16 GHISLAINE MAXWELL: Thank you.

17 DAVID MARKUS: Oh, thanks. I thought you
18 were giving it to him.

19 GHISLAINE MAXWELL: I've got something
20 that blew up my nose.

21 TODD BLANCHE: So just take some water.
22 It's okay, no problem.

23 You were not at the MCC during that time,
24 correct?

25 GHISLAINE MAXWELL: I was not.

1 TODD BLANCHE: So you're going to tell us
2 what you believe, but just to -- I just want to make
3 sure I understand, your basis for belief is kind of
4 what you've read and seen and your knowledge of
5 Mr. Epstein for the many years you knew them -- knew
6 him, right?

7 GHISLAINE MAXWELL: And actually there's a
8 third component.

9 TODD BLANCHE: Okay.

10 GHISLAINE MAXWELL: The answer to that is,
11 yes.

12 TODD BLANCHE: Okay.

13 GHISLAINE MAXWELL: And there's a third
14 component to that, which is having experienced now,
15 the mismanagement and inefficiencies and total
16 dereliction of duty at the Bureau of Prisons.

17 TODD BLANCHE: From BOP. From the Bureau
18 of Prisons.

19 GHISLAINE MAXWELL: Yes.

20 TODD BLANCHE: Okay. Fair. Okay. So,
21 you know, I want to -- what I do want to be careful
22 about is -- you know, asking you to speculate,
23 because anybody can do that. And I don't think
24 that's fair to you or anybody else to ask you to give
25 us your kind of opinion.

1 But, do you think that -- the third point
2 you say, which is kind of a failure by the BOP,
3 there's been a lot of -- there's an OIG report,
4 there's SDNY investigation about that. Do you -- so
5 you think he was -- he did not die by suicide, given
6 all the things we just talked about.

7 GHISLAINE MAXWELL: I do not believe he
8 died by suicide, no.

9 TODD BLANCHE: And do you believe that --
10 do you have any speculation or view of who killed
11 him?

12 GHISLAINE MAXWELL: I -- no, I don't.

13 TODD BLANCHE: And I ask that because, if
14 you don't believe that there's any truth to the
15 allegations of blackmail or that he had kind of a
16 list, or that he had reasons to have people hate him,
17 why would somebody kill him in prison?

18 GHISLAINE MAXWELL: In prison, where I am,
19 they will kill you or they will pay -- somebody can
20 pay a prisoner to kill you for \$25 worth of
21 commissary. That's about the going rate for a hit
22 with a lock today.

23 TODD BLANCHE: So that goes to the third
24 reason, which is kind of the mismanagement.

25 GHISLAINE MAXWELL: Yes.

1 TODD BLANCHE: Or the shortcomings or
2 shortcomings of the Bureau of Prisons.

3 GHISLAINE MAXWELL: Yes.

4 TODD BLANCHE: Which is a little bit
5 different than my -- from my question is, which is,
6 do you think there was somebody on the outside of
7 prison, so putting aside, what could happen on the
8 inside on the outside of prison, who would -- who
9 wanted him dead so badly that he would've, or she
10 would've, you know, caused him to be killed on the
11 inside?

12 GHISLAINE MAXWELL: I think that's -- I
13 don't see that. I think, is it possible? Of course
14 it's possible. But I don't know of any reason why,
15 and I don't believe in the blackmail or in any of
16 this, I don't think Epstein had a hit on like that.
17 If it is indeed murder, I believe it was an internal
18 situation.

19 TODD BLANCHE: Yeah. So you're not -- you
20 don't have any reason firsthand knowledge or even
21 speculation, it sounds like, to think that he was --
22 if -- that he was killed to kind of silence him or to
23 keep him from going public about people he knew
24 about?

25 GHISLAINE MAXWELL: I don't, no, because I

1 think that is just part of the story that's been
2 created that started back in 2008, '09.

3 TODD BLANCHE: Okay. Yeah, I mean, that's
4 the point. Like, I don't want -- I don't think
5 there's value in talking -- you know, there's been a
6 lot of -- there's a lot of information about what
7 happened, you know, at the MCC and -- but what is
8 important to me is whether, you know, if -- is the
9 idea that he didn't die by suicide, that's one thing.
10 But if to the extent that folks believe that he was
11 murdered to keep him quiet or because he had
12 information on rich and powerful people, that's what
13 I -- do you have any reason to believe that that's
14 true?

15 GHISLAINE MAXWELL: I do not have any
16 reason to believe that. And I also think it's
17 ludicrous, because if that -- I also happen to think
18 if that is what they wanted, they would've had plenty
19 of opportunity when he wasn't in jail. And if they
20 were worried about blackmail or anything from him, he
21 would've been a very easy target.

22 TODD BLANCHE: In the time -- so we've
23 talked about a lot of time, all the way up through
24 2009, '10, and then your -- the time that after
25 Mr. Epstein was arrested, when's the last time you

1 spoke with him?

2 GHISLAINE MAXWELL: Maybe 2016, 2017,
3 maybe 2016 -- 2015, 2016, 2017 in that area, I
4 believe.

5 TODD BLANCHE: And what -- when you're
6 thinking about that last time was that you had
7 talked -- been talking to him a lot, and then you
8 stopped, or was that a one-off time and it was
9 infrequent at that point?

10 GHISLAINE MAXWELL: I really wasn't in
11 communication. The only communications I had with
12 him was in -- with regards to the civil suits, the
13 civil suit that I found myself in, the defamation
14 suit I found myself in. I needed help, I needed
15 information, and I didn't have what I needed.

16 And so that was really what it was -- that
17 what drove it, was me trying to get myself out of
18 this situation, which I -- ultimately led to where I
19 am today.

20 And so when -- when all that -- when
21 that -- I don't remember even if I stopped talking to
22 him before that, I think he was -- I thought he was
23 angry with me anyway. He didn't like what I did, and
24 he -- I wasn't interested in what he had to say to
25 me, and --

1 TODD BLANCHE: What did you think he was
2 angry with you about?

3 GHISLAINE MAXWELL: I think he was angry
4 that I had even said that I had referred to her being
5 a liar. He said I should have not said anything but.

6 TODD BLANCHE: When the civil suits that
7 were ongoing before Mr. Epstein's death?

8 GHISLAINE MAXWELL: Yes.

9 TODD BLANCHE: Did your lawyers coordinate
10 with his lawyers, like in discovery and things like
11 that or anything?

12 GHISLAINE MAXWELL: I don't think we
13 coordinated in -- I don't -- I'm not sure.

14 TODD BLANCHE: Okay.

15 GHISLAINE MAXWELL: I don't want to
16 misspeak. I don't -- I -- there was some degree of
17 communication for sure. I just don't know the degree
18 that that took place. So definitely -- I mean, I was
19 definitely hoping for him to be more helpful. And I
20 was definitely, coordinating is not a good word,
21 because that sounds like I was trying to make --
22 align myself.

23 That's not where we were going here, but I
24 was definitely trying to get help. As in documents
25 or information that I could use to defend myself.

1 That's a hundred percent true. And the degree to
2 which that took place, I'm not -- I don't recall.
3 There was definitely some of that, though. I don't
4 want to mislead you.

5 TODD BLANCHE: And we touched on this
6 earlier, but I just want to -- I don't think we
7 really ran it to ground maybe as much as we could
8 like. Going up through that time, you know, so in
9 the '16, '17, '18, up until the time he's arrested,
10 had your view or your understanding of what had
11 happened changed?

12 Meaning did you believe that in the late
13 '90s or early 2000s when he started, you know,
14 behaving much differently. Did you believe what you
15 were hearing about him at that point?

16 GHISLAINE MAXWELL: My views, I didn't
17 like the people he was with anyway. So I don't find
18 -- how do I say this? I don't like -- I like people
19 who my age or older, and I don't find the society of,
20 or the companionship of younger people who are young
21 people, I suppose, is really that enjoyable. So I
22 don't like the company that he chose to be with, and
23 so I just was -- I find it boring and fundamentally
24 uninteresting. That's probably the nicest way I can
25 say it.

1 TODD BLANCHE: Yeah. Okay. So I think
2 what we should do is just spend a few minutes talking
3 about tomorrow. Everything was great today. I think
4 that we -- it was very helpful and I appreciate you
5 trying to be as complete as you can.

6 I think tomorrow -- you've said a few
7 things today about materials that you brought. When
8 we're done, we will give you a few minutes with Mr.
9 Markus to -- if there's things that you want to show
10 him that you think we should see.

11 Like I said, I'm not asking you to
12 corroborate anything. If I was asking you to
13 corroborate something, I would tell you, but if
14 there's something you think that you don't think that
15 the government has seen or you think that is
16 important for me to see, let Mr. Markus know and he
17 can share it with me.

18 Tomorrow we'll certainly have some
19 follow-on questions when we all think about tonight.
20 And I think you will too. You know, we can all think
21 about stuff we've talked about. We covered a lot of
22 different areas. We are -- I do want to talk about
23 more about you.

24 So by design today we wanted to focus on
25 Mr. Epstein and talk about, you know, kind of, well,

1 everything under the sun that we've gone through
2 today. I do think it's important when we all
3 evaluate what you've said today, and kind of your
4 story to understand, to also understand your -- why
5 you're here, right?

6 So you were indicted, you were charged,
7 you went to trial. And I want to do that in a way
8 that gives you an opportunity to say -- to kind of
9 say your piece or to say what you haven't said
10 before.

11 But also understanding that there was
12 people who took the witness stand and swore to tell
13 the truth and testified about you, and what you did,
14 and what they think you saw and what they heard you
15 say.

16 And I'm not -- I said to Mr. Markus, I'm
17 not trying to create a kind of a she said, she said
18 situation or he said, she said situation. But I do
19 want to hear from you about your conduct, because
20 it's important, I think, for when we evaluate what
21 you say and how you say it and your recollection of
22 things to also to talk about that.

23 So we're going to -- we'll do that
24 tomorrow. I want to talk about, you know, the
25 circumstances leading up to your arrest. There's a

1 lot of, I think, misinformation or there's a lot of
2 information out there that -- I don't know whether
3 there's misinformation, but about the time from, you
4 know, 2019 up until the time that you were -- that
5 you were arrested.

6 And then, like I said, that'll take us
7 through lunch tomorrow and then we'll be done. I'm
8 not -- I don't have a plan. I didn't know that I was
9 coming here until this week, okay? So I'm not --
10 there isn't like a -- we don't have like a schedule
11 of what happens next or what happens.

12 But the -- but that's not a negative
13 thing. I'm just saying that that's -- so you
14 shouldn't take the lack of a next step as anything
15 other than, we don't have a next step yet, so.

16 GHISLAINE MAXWELL: May I say something?

17 TODD BLANCHE: Of course, yes.

18 GHISLAINE MAXWELL: I just would like to
19 put out there that I also focused on how I think the
20 president got swept into some of this unnecessarily,
21 by the way. And I'm not a conspiracy theorist, and I
22 certainly don't subscribe to all the -- all of
23 everything that I see.

24 But I do believe that there is animus in
25 some areas that may have contributed to how the use

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1 of the president to harm him, that I find deeply
2 offensive. And whilst I can't obviously say
3 definitively that that is what it is, I would like to
4 show you what I see so that you can evaluate it and
5 do with that as you see fit if it needs to be
6 addressed. I've seen it, it struck me, and I would
7 like to give it to you.

8 TODD BLANCHE: Sure.

9 GHISLAINE MAXWELL: For what it's worth.

10 TODD BLANCHE: Okay.

11 GHISLAINE MAXWELL: Does that seem
12 something that I can --

13 TODD BLANCHE: Yeah, that's fine. Yeah.

14 GHISLAINE MAXWELL: Of course. I don't
15 like that.

16 TODD BLANCHE: Yeah. Okay. That's fine.
17 That's great. Okay, so why don't we stop for today.
18 I'll give you a little bit of time to chat and then,
19 see you in the morning.

20 SPENCER HORN: This will conclude the
21 recorded proffer interview for Thursday, July 24th.
22 We will continue tomorrow, Friday, July 25th. The
23 time is 3:34.

24 (Interview concluded at 3:34 p.m.)
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United States Department of Justice
INTERVIEW OF: GHISLAINE MAXWELL

DATE: July 25, 2025

APPEARANCES:

For the United States:

Todd Blanche, Deputy Attorney General

Diego Pestana, Acting Associate Deputy
Attorney General

Spencer Horn, FBI Special Agent

Mark Beard, Deputy U.S. Marshal

For Ghislaine Maxwell:

David Markus

Leah Saffian

Melissa Madrigal

1 I N T E R V I E W

2 ***

3 SPENCER HORN: Good morning. It is
4 Friday, July 25th, the time is 9:24 a.m. My name is
5 Spencer R. Horn. I'm the Assistant Special Agent in
6 Charge of FBI New York. And we are here for a
7 recorded proffer agreement with Ms. Maxwell.

8 TODD BLANCHE: Good morning, Ms. Maxwell.
9 How are you?

10 GHISLAINE MAXWELL: Good morning.

11 TODD BLANCHE: Good. So the proffer
12 agreement we signed yesterday, I just -- there's a
13 place on it for us to all kind of initial. It's
14 exactly the same document and you'll see your
15 signature. If you can just initial right to the left
16 of -- right here.

17 GHISLAINE MAXWELL: Here?

18 TODD BLANCHE: Right there.

19 GHISLAINE MAXWELL: Oh, it's okay.

20 TODD BLANCHE: And then Mr. Markus will --

21 DAVID MARKUS: Yes.

22 TODD BLANCHE: -- initial as well. Thank
23 you.

24 And just to kind of -- before we get
25 going, I'll just say that exactly the same folks that

1 were here when we met yesterday are here today. So
2 there's no -- I'm not going to do formal
3 introductions, because it's exactly the same group of
4 folks.

5 So we're continuing, Ms. Maxwell, our
6 discussion of yesterday. And the same -- the same
7 kind of rules apply. If you -- we'll take breaks, if
8 you need to talk to Mr. Markus or your lawyers, no --
9 absolutely no problem. Just let me know. I'll try
10 to ask my questions in a coherent manner, but if
11 there's anything that I say that's confusing,
12 definitely interrupt me.

13 GHISLAINE MAXWELL: I will. Thank you.

14 TODD BLANCHE: So I think the easiest
15 thing to start with is, is there anything that we
16 talked about yesterday that -- we're going to go
17 through some more names. I think that we -- that's
18 one of the places that we -- that we interrupted,
19 just because there's a lot of names.

20 But aside from additional names, is there
21 anything that you wanted to kind of follow up on that
22 we talked about yesterday or anything that you
23 thought maybe you remember more of or not?

24 GHISLAINE MAXWELL: Some more names did
25 come to me in the night, and I did have some

1 additional memories just for clarity. I believe I
2 said that I couldn't think of anybody who I may have
3 asked from Mar-a-Lago, but then I realized that I
4 was -- the allegation at least is that I met **DOJ REDACTION**
5 in Mar-a-Lago and so I felt that I needed to address
6 that. And I didn't want to leave that hanging
7 because that seems weird under the circumstances.

8 And also -- but I couldn't remember anyone
9 and -- maybe, you know, it's a long period of time.
10 So the issue is not that I'm trying to not say, but I
11 just don't -- I don't remember anybody that I would
12 have. But it's not impossible that I might have
13 asked someone from there.

14 TODD BLANCHE: I don't -- I don't know
15 exactly what you said yesterday, but I don't think
16 what you said yesterday is different than what you
17 just said. So, yes. There's --

18 GHISLAINE MAXWELL: Okay. I just wanted
19 to be -- I just didn't want to feel that I had said
20 no to something and that it -- and --

21 TODD BLANCHE: **DOJ REDACTION** definitely had
22 has said that she was working at Mar-a-Lago and that
23 you received a treatment of her -- from her at some
24 point, and that you recruited her to meet
25 Mr. Epstein.

1 GHISLAINE MAXWELL: Right.

2 TODD BLANCHE: Do you know, affirmatively,
3 whether that's true or false, or do you just not have
4 a memory either way?

5 GHISLAINE MAXWELL: I really don't believe
6 it's true. But I know that I did go to spas and if I
7 met someone, I did ask if they're (indiscernible) --
8 so I don't -- in the realms of possibility, it could
9 have, but I have no memory of it.

10 TODD BLANCHE: Okay.

11 GHISLAINE MAXWELL: And I don't believe
12 that that it's how it went down, but I don't want
13 to --

14 TODD BLANCHE: Okay. So I want to talk
15 about -- we talked a little bit yesterday about the
16 financial part of your relationship with Mr. Epstein,
17 kind of being on payroll, for lack of a better word,
18 for many, many years, starting around \$25,000 and
19 ending up at around \$250,000 per year.

20 There's -- as you know, from your trial,
21 there's banking information that shows a ton of money
22 being sent to you from Mr. Epstein over the years.

23 And I think totaling something like
24 \$30 million, something like this. What's -- what's
25 the -- why was that money sent to you? Like, what

1 was that for?

2 GHISLAINE MAXWELL: Well, first of all, I
3 don't -- I dispute the characterization that the
4 money was sent to me.

5 TODD BLANCHE: Okay. So tell me what -- I
6 am stuck with the witnesses at trial and what was
7 said at trial on that issue. So what -- what -- what
8 is the -- what do you dispute about that?

9 GHISLAINE MAXWELL: Well, I believe -- I
10 don't have full recollection. I'm not even sure I
11 ever saw what they accused me of, but my belief is
12 that that money also contained money that was for a
13 helicopter, for instance, that I never owned and I --
14 was never mine. And --

15 DAVID MARKUS: In other words, money was
16 sent to you that you then used to purchase things
17 or...

18 GHISLAINE MAXWELL: Well, I'm not even
19 sure that I purchased it. So the accounts -- those
20 accounts would be controlled by his accountants.
21 And --

22 TODD BLANCHE: Even accounts in your name,
23 you're saying, or one of your entities?

24 GHISLAINE MAXWELL: Well, I'm not even
25 sure I knew of all the entities. I'm not -- I

1 don't -- it -- maybe I did, contemporaneously, but I
2 simply wouldn't know today. So if there was an
3 entity, let's say account X, if I really set that up
4 myself or whether they said, we're doing this and the
5 money's coming or whatever. But in no substantive
6 way -- I can't think of the right word.

7 DAVID MARKUS: Did you have control
8 over --

9 GHISLAINE MAXWELL: I had no control, is
10 what I'm saying.

11 TODD BLANCHE: So when -- when the
12 government -- when there was testimony or the
13 government admitted evidence that showed, for
14 example, \$5 million in 2002 coming from Epstein to
15 you, okay, what you're saying is that that may --
16 that happened, but that the you there, wasn't money
17 that -- he wasn't giving you money.

18 GHISLAINE MAXWELL: I'm not going to say
19 that for everything, because maybe there were
20 accounts that money was sent to me. But I can say
21 that I know -- like the helicopter, I can
22 definitively say. I'd have to look at all of them to
23 be accurate for you.

24 But to explain how or why I could be
25 receiving monies, and I certainly did. So I'm not

1 disputing all of it.

2 TODD BLANCHE: But when you said -- let's
3 go back and look. Why would -- why did money have to
4 go into your accounts or account that was controlled
5 by others, but in your name to, like, purchase a
6 helicopter?

7 GHISLAINE MAXWELL: Oh, that's a very good
8 question. I don't -- I'm not sure I know the answer
9 to that. I don't.

10 TODD BLANCHE: So let me ask this maybe a
11 different way that gets to the issue, right? So the
12 accusation by the government, based upon the evidence
13 they collected, is that Epstein paid you millions and
14 millions of dollars over the years.

15 And the reason why he paid you that is
16 because you were performing an extraordinary service
17 for him by recruiting young women, many of whom were
18 underage to -- so that he could sexually abuse them.
19 Okay. That's their -- that's their allegation.
20 Okay.

21 From what you said yesterday and from what
22 I've reviewed about you and Mr. Epstein, he paid for
23 a lot in your life.

24 GHISLAINE MAXWELL: Absolutely.

25 TODD BLANCHE: Your flights, where you

1 stayed with him. I mean, he didn't expect you to
2 reimburse him along the way for food and, you know,
3 so he took care of you for many years.

4 GHISLAINE MAXWELL: That is true.

5 TODD BLANCHE: On top of that, he actually
6 paid you a salary as we talked about \$25,000 to
7 \$250,000. What else did he give you? Or what
8 purchase -- like, was there a time when he gave you a
9 million dollars or \$500,000 as a bonus? Or what --
10 what financial benefit did you receive from him,
11 besides what we've already talked about. We don't
12 have to talk about what, you know, so --

13 GHISLAINE MAXWELL: I got it. I got it.

14 TODD BLANCHE: Okay.

15 GHISLAINE MAXWELL: So my goal, always,
16 was to become independent, independently, financially
17 secure and work for myself. I've never been one to
18 not work. And in that regard, over the course of my
19 friendship and my working relationship with Epstein,
20 I expressed to him my desire to be independent of him
21 everywhere, just to be freestanding.

22 And the -- in -- with that in mind, I
23 wanted to have my own businesses or my own money
24 coming in independent and separate from any salary
25 that I received from him.

1 And I needed that for my self-esteem.
2 I've never been -- I mean, obviously salary and it
3 was a very generous one. Please, I'm not belittling
4 the sum of money, because it's huge, but I was
5 brought up to work and I was brought up to be my own,
6 you know.

7 The first time -- so I would either
8 propose businesses to him or he would actually
9 suggest why didn't I do something in the first deal
10 that we did, or the first business that we had or I
11 had and that he financed for me.

12 So he gave -- he loaned me all the money
13 to enable me to do this and then I reaped the
14 profits, which I don't remember now, because we
15 varied over the deals that we did, that I would give
16 him 50 percent or 25.

17 It was sort of -- it was random.

18 TODD BLANCHE: So --

19 GHISLAINE MAXWELL: And I can tell you
20 what it is, so we can compare it.

21 TODD BLANCHE: Yeah. Go ahead.

22 GHISLAINE MAXWELL: So it was in Palm
23 Beach actually, and it was in real estate. And they
24 sold what was the grounds originally of an estate
25 called the Phipps Estate. And then they converted

1 the land that came with that estate into houses. And
2 I did, I think, two or maybe -- I can't remember now,
3 but certainly one and maybe two, possibly three. I
4 don't think so. I think two, that then were flipped
5 and there was a profit.

6 So that would be an example of that. But
7 I didn't have the money, so he lent me the funds to
8 do that business transaction and then I reaped the
9 profits.

10 TODD BLANCHE: And so -- but when --

11 GHISLAINE MAXWELL: And that's millions of
12 dollars.

13 TODD BLANCHE: -- when a financial
14 investigator like, the FBI looks at accounts, they
15 don't know kind of the conversations you're having.
16 They just see the money.

17 GHISLAINE MAXWELL: Right.

18 TODD BLANCHE: So in those cases, when
19 that happened, when he would -- when he financed that
20 with you, would he send money to you? So does that
21 explain some of the money? Like, I guess --

22 GHISLAINE MAXWELL: I believe -- I think
23 it does. I think, for instance, there were two
24 Gullwing Mercedes that they did with Mercedes and
25 Aston Martin. You can look it up, I think, if I'm

1 right. That had the doors that would come up like
2 this --

3 TODD BLANCHE: Okay.

4 GHISLAINE MAXWELL: There were only a very
5 limited number that were made. So I knew that we
6 could get those and flip them right within 24 hours,
7 for example.

8 Also my -- here's another example of
9 something that you guys wouldn't have known about is
10 I became a banker. I got my Series 63, Series 67
11 banking license and became a broker for like a new
12 (inaudible). And then -- because I was day trading.
13 Everything I had I day traded with -- through an
14 account.

15 And I think I was lucky more than smart,
16 but I made quite a lot of money doing that. And so
17 --

18 TODD BLANCHE: When was that? Like what
19 -- approximate time --

20 GHISLAINE MAXWELL: Again, that's in the
21 '90s again. I don't -- oh, wait. I think -- well,
22 you can find it, because it'll be my banking license,
23 right? That'll be something that you can look up,
24 probably.

25 TODD BLANCHE: Yeah.

1 GHISLAINE MAXWELL: So what whatever that
2 is -- and I just don't remember when that is. I'm
3 sorry.

4 TODD BLANCHE: So -- okay. So --

5 GHISLAINE MAXWELL: And so for an example,
6 I was -- I was doing really, really, really well.
7 And so he was like, how do you do that? Well, how
8 are you -- what are you -- why are you investing in,
9 I don't know, Apple when nobody liked Apple. This
10 is, you know, before Apple or Microsoft. I didn't
11 know Bill Gates, so this is not related to him.

12 But my family --

13 DAVID MARKUS: Don't charge her with
14 insider trading.

15 GHISLAINE MAXWELL: Please -- no. I'm not
16 trying to suggest that. Oh, goodness. Please, no.
17 I had no --

18 DAVID MARKUS: It was just a joke.

19 GHISLAINE MAXWELL: Okay.

20 TODD BLANCHE: It was a joke.

21 GHISLAINE MAXWELL: Yeah. No. All right.

22 But my -- going back to my family, my dad
23 had given me an account when I was 12 and I had
24 always an interest in business and finance, not --
25 not very sophisticated. I'm not suggesting that.

1 And so I like to trade and so I did and I
2 did well. And so then I would tell him what I was
3 doing. Now, whether he did or he didn't, he told me
4 he matched me in some other accounts that he had.
5 Because he did a lot of -- he -- my observation, to
6 go back to what he did, I observed him personally and
7 have recollection -- personal recollection of him
8 trading this money, lots. Tens of millions, hundreds
9 of millions of dollars.

10 TODD BLANCHE: That was -- that he was
11 trading for other people --

12 GHISLAINE MAXWELL: Yes.

13 TODD BLANCHE: -- or that was his own
14 money?

15 GHISLAINE MAXWELL: I want also to clarify
16 something for you or clarify or underline. Wexner
17 was, in my opinion, his closest friend in this time
18 period from when I met him in '91, right, all the way
19 until-- well, 'til, I don't know.

20 Because I wasn't that friendly with --
21 well, I did travel with Mr. Wexner, but Epstein told
22 me that Wexner didn't want to be seen too much with
23 me, because of my family problems. You know, whether
24 that was --

25 TODD BLANCHE: You mean the problems that

1 your father's company had with --

2 GHISLAINE MAXWELL: Yes.

3 TODD BLANCHE: -- embezzlement or

4 allegations of --

5 GHISLAINE MAXWELL: Yes. Yes. That's
6 what I'm talking about.

7 And now, actually today -- not
8 contemporaneously, but today I don't believe that
9 that's even true. I think it was used as a means to
10 not have me travel with him to Ohio or whatever. It
11 was just a way to park me.

12 And I believe that now, because within the
13 discovery there was a lot of -- well, not a lot, but
14 there was some indications that he would actively
15 tell other people to lie to me or conceal things from
16 me, and that he never loved me and I wasn't his type.
17 That's in the discovery somewhere.

18 TODD BLANCHE: So -- okay. So the
19 government had evidence that, even as late as 2007,
20 he paid you a lot of money.

21 GHISLAINE MAXWELL: What was that? What
22 was the money?

23 TODD BLANCHE: Like several -- millions of
24 millions of dollars in 2007. \$7.4 million, I think.

25 GHISLAINE MAXWELL: What was that for?

1 Was it -- was that the helicopter?

2 TODD BLANCHE: That was -- that's my
3 question for you.

4 GHISLAINE MAXWELL: Oh, sorry.

5 TODD BLANCHE: I don't know.

6 GHISLAINE MAXWELL: Okay. Sorry.

7 TODD BLANCHE: So in 2007 --

8 GHISLAINE MAXWELL: I think that was
9 probably the helicopter. That could have been --

10 TODD BLANCHE: That was what?

11 GHISLAINE MAXWELL: That could have been
12 the helicopter, the Sikorsky. Those big chunks like
13 that, I don't -- I didn't -- I don't personally have
14 any memory of receiving a check from him for
15 \$7 million. I just -- I just don't. But I would
16 have to -- I know I -- so the answer to your
17 question, to be precise --

18 DAVID MARKUS: You would remember if it
19 went into your pocket --

20 GHISLAINE MAXWELL: I would remember if it
21 went -- I would -- he never paid me to -- for
22 services that you just described, \$7 million, to --
23 for any nefarious reason.

24 TODD BLANCHE: Yeah. I think I understand
25 what you've said about being on the payroll and

1 helping -- him helping you with businesses, and
2 giving you a lot of life things along the way. You
3 travel with him, you ate with him. He's, you know,
4 but there is the -- these massive amounts of money,
5 one-time payments that I --

6 GHISLAINE MAXWELL: So I don't -- you'd
7 have to trace that, right? So I don't believe that
8 came into my account or I had any control. I have no
9 memory of that. I have no -- no --

10 TODD BLANCHE: Well, but if there's
11 records that show it coming into your account, it
12 sounds like what you're saying is that not -- putting
13 aside your -- you have no memory of that money being
14 yours.

15 GHISLAINE MAXWELL: No.

16 TODD BLANCHE: Like you didn't -- that
17 money is not somewhere --

18 GHISLAINE MAXWELL: No. I wouldn't be
19 like, oh, yippee, let me go. I got \$7 million. I'm
20 going to go buy myself a yacht. No. Or I don't
21 know, something else or move it to some other -- no.

22 I don't think -- I don't think, if you
23 look -- you'll have to check, obviously you will. I
24 don't think you'll find that money moving in any --
25 to any account, either of mine or it shouldn't show,

1 I don't believe anyway. As far as I recollect, it
2 wouldn't show me spending it.

3 TODD BLANCHE: Right.

4 GHISLAINE MAXWELL: Does that make sense?

5 TODD BLANCHE: Okay. Yeah, that makes
6 sense. I mean, I think if -- I don't think there's
7 any dispute by anybody, even your lawyers at trial,
8 that -- that that the money went in.

9 GHISLAINE MAXWELL: Oh, \$7 million in
10 when, what year?

11 TODD BLANCHE: Well, there's several
12 years; in 2007.

13 GHISLAINE MAXWELL: And?

14 TODD BLANCHE: 2002, there was \$5 million
15 that you were paid in 2002.

16 GHISLAINE MAXWELL: Oh, well, I'd have
17 to -- I don't -- I don't remember. But -- okay. So
18 there's -- there would be another large sum, but it
19 wouldn't have come from him later. But it had
20 nothing to do --

21 TODD BLANCHE: The biggest one was in
22 1999. There's over \$18 million. \$18.3 million.

23 GHISLAINE MAXWELL: I don't know what that
24 is.

25 TODD BLANCHE: So what -- but you --

1 you're -- but what you're saying, it sounds like, and
2 if you don't know, we're going to -- we can move on.

3 But when we're talking about \$18.3 million
4 in '99, \$5 million in -- three years later in 2002,
5 \$7.4 million in 2007. That -- those -- that money
6 adds up to around \$30 million.

7 You were not paid that by Mr. Epstein.
8 Meaning, that's not money you received for your
9 benefit, even if it was put into your accounts.

10 GHISLAINE MAXWELL: I don't believe any of
11 that was my money. Now, I do -- I just -- like I
12 said, we did do these things --

13 TODD BLANCHE: Yes. I understand that.

14 GHISLAINE MAXWELL: - - with the cars.

15 TODD BLANCHE: I understand that.

16 GHISLAINE MAXWELL: And as --

17 TODD BLANCHE: But --

18 GHISLAINE MAXWELL: I don't know if any of
19 that money, some of it -- if it moves, some of that
20 may have come from the car or a house that was sold
21 that I had an interest in with him. That's possible.
22 But I don't think this money is mine.

23 LEAH SAFFIAN: But also, the record should
24 reflect, too, that there were times Ghislaine's name
25 was used, for example, Air Ghislaine. Her name was

1 in the name of the entity. It had nothing to do with
2 her. And if you pull signatures --

3 TODD BLANCHE: Yeah.

4 LEAH SAFFIAN: -- there's no evidence for
5 that.

6 TODD BLANCHE: No. My -- what I'm trying
7 to just make sure I -- that I understand, is that the
8 idea that you were paid \$30 million between '99 and
9 2007, in order to -- by Mr. Epstein to reward you for
10 recruiting young women. That is in your -- you're
11 saying that is categorically, completely false?

12 GHISLAINE MAXWELL: That is categorically
13 false, correct.

14 TODD BLANCHE: Okay. So I want to just --
15 we went through several individuals yesterday and I
16 want to go through just a couple of more names and
17 ask if you -- if you know them. And if you do know
18 them, how you know them.

19 Do you know Elon Musk?

20 GHISLAINE MAXWELL: I do.

21 TODD BLANCHE: And how did you meet
22 Mr. Musk?

23 GHISLAINE MAXWELL: I met him in -- I
24 don't remember the year, but it's going to be in
25 2010, '11, something like that, I think, if my memory

1 serves.

2 And I was at an event for Sergey Brin, the
3 co-founder of Google. And Sergey had arranged for --
4 it was for his birthday.

5 And we were -- or a bunch of us, I don't
6 even remember how many we were, but not many of us.

7 Maybe -- I don't know. If I say 40, I
8 could be wrong. If it was 30 or 50, I don't
9 remember. I'm sorry.

10 Went to another friend's island. Somebody
11 called Mr. Pigozzi in the Caribbean and -- not with
12 Epstein, he was not there, to celebrate Sergey's
13 birthday. And we were there together for, I want to
14 say, three or four days, something like that in my
15 memory. And Mr. Musk was present for that.

16 TODD BLANCHE: And that was the first time
17 you met him, as far as you know?

18 GHISLAINE MAXWELL: As far as I remember,
19 yes.

20 TODD BLANCHE: Did you meet -- did you
21 know his brother, Mr. Musk's brother?

22 GHISLAINE MAXWELL: I don't know if I've
23 ever met him. I know that he has a brother and I
24 don't think I met him.

25 TODD BLANCHE: Aside from that time in --

1 around 2010, on the island in the Caribbean for a
2 couple days, did you -- have you seen -- do you know
3 Mr. Musk beyond that time?

4 GHISLAINE MAXWELL: We met at -- I was at
5 the Oscars and we met at the Oscars.

6 TODD BLANCHE: What year was that, earlier
7 or later?

8 GHISLAINE MAXWELL: It was post that
9 event, I believe.

10 TODD BLANCHE: And do you know whether
11 Mr. Epstein knew Mr. Musk?

12 GHISLAINE MAXWELL: I believe they did.
13 And the only reason I say that is not from my memory,
14 but because I saw -- I think I saw -- my memory is
15 that in discovery, they were communicating on email.

16 TODD BLANCHE: So you have no personal
17 knowledge of that?

18 GHISLAINE MAXWELL: I have no --

19 TODD BLANCHE: It's just what you've --
20 what you've seen from the press or from discovery?

21 GHISLAINE MAXWELL: And I believe his
22 brother as well, actually.

23 TODD BLANCHE: Excuse me?

24 GHISLAINE MAXWELL: Mr. Musk's brother as
25 well. But I don't -- my -- like I said, my memory is

1 not -- it's not as good as I would like it to be.

2 And I just want to say that.

3 TODD BLANCHE: Do you -- you mentioned, I
4 think, yesterday in passing -- well, not in passing,
5 but as part of another answer, Andrew Cuomo.

6 GHISLAINE MAXWELL: Yes.

7 TODD BLANCHE: Did you know Mr. Cuomo?

8 GHISLAINE MAXWELL: Well, only because he
9 was married to Kerry.

10 TODD BLANCHE: Yes. Okay.

11 GHISLAINE MAXWELL: And I think I knew his
12 brother as well. What's -- he has a brother, right?
13 He's on TV. What's his name?

14 LEAH SAFFIAN: Chris.

15 GHISLAINE MAXWELL: Right. Christopher.

16 LEAH SAFFIAN: Christopher Cuomo.

17 TODD BLANCHE: Yeah. Chris.

18 GHISLAINE MAXWELL: Chris.

19 TODD BLANCHE: You mean the TV -- the
20 former TV anchor or the TV anchor, Chris Cuomo?

21 GHISLAINE MAXWELL: Yes.

22 TODD BLANCHE: Okay.

23 GHISLAINE MAXWELL: So -- but I would say
24 just socially, not -- I'm not close friends or
25 anything, but because we -- I was friends with Kerry

1 and I met him a few times and I certainly met his
2 brother as well a few times.

3 TODD BLANCHE: And the same questions that
4 I asked about Mr. Musk, do you know whether
5 Mr. Epstein knew Andrew Cuomo or Chris Cuomo or
6 Ms. Kennedy, your friend?

7 GHISLAINE MAXWELL: I don't think so.

8 TODD BLANCHE: And so you never -- you
9 don't recall any of those three individuals, like,
10 flying on Mr. Epstein's plane --

11 GHISLAINE MAXWELL: No.

12 TODD BLANCHE: -- or visiting him in
13 Palm Beach or at the island?

14 GHISLAINE MAXWELL: No.

15 TODD BLANCHE: I think you mentioned
16 former Secretary of State John Kerry yesterday. But
17 if not, do you know Mr. Kerry or no?

18 GHISLAINE MAXWELL: I have met him, but I
19 don't know if Mr. Epstein ever met him. I met him
20 only -- well, really I can't even probably
21 characterize that as a meeting, but I was very, very
22 involved in the Ocean at Work, through the -- you
23 asked me yesterday about TerraMar.

24 And if I recall right, I met Mr. -- the
25 Secretary that way through the Ocean, but he wouldn't

1 know who I am, I doubt. I don't think.

2 TODD BLANCHE: Do you know whether --
3 well, do you know former Senator Ted Kennedy?

4 GHISLAINE MAXWELL: Yes.

5 TODD BLANCHE: And does -- is that through
6 your own life or through Mr. Epstein?

7 GHISLAINE MAXWELL: My life.

8 TODD BLANCHE: Do you know whether
9 Mr. Epstein knew Senator Kennedy?

10 GHISLAINE MAXWELL: I don't believe so.

11 TODD BLANCHE: And so for the folks we
12 just talked about, so former Secretary of State John
13 Kerry, Ted Kennedy, did -- you don't know whether
14 Mr. Epstein knew them, so I take that to mean you
15 have no recollection of them flying on his planes--

16 GHISLAINE MAXWELL: Oh God, no.

17 TODD BLANCHE: Okay.

18 GHISLAINE MAXWELL: Oh. But Bobby Kennedy
19 knew him. Bobby, the health --

20 TODD BLANCHE: Sorry. Say that again
21 about Bobby Kennedy.

22 GHISLAINE MAXWELL: Bobby knew
23 Mr. Epstein.

24 TODD BLANCHE: How do you know that?

25 GHISLAINE MAXWELL: Because we went on a

1 trip together. Was -- we went to -- dinosaur bone
2 hunting in the Dakotas.

3 TODD BLANCHE: When was that, you know,
4 approximately? I'm not looking for an exact date,
5 but when was that?

6 GHISLAINE MAXWELL: That was early -- that
7 was in the early -- well, let me back up. I knew
8 Bobby's wife, Mary, pretty well, actually. And
9 before he met her.

10 TODD BLANCHE: And just to help us, I know
11 we're talking about a wide span of time, but what are
12 you -- when are you talking about that you knew
13 Mr. Kennedy's wife before they were married.

14 So when are talking about the --

15 GHISLAINE MAXWELL: I -- in 19 -- all
16 right. I guess, let's get my head straight. In --

17 TODD BLANCHE: Well, would this have been
18 before you met Mr. Epstein --

19 GHISLAINE MAXWELL: Yes.

20 TODD BLANCHE: -- or after? Okay. So --

21 GHISLAINE MAXWELL: I met him before I
22 met.

23 TODD BLANCHE: So we're talking about the
24 1980s.

25 GHISLAINE MAXWELL: Oh, yes. Yes. Thank

1 you.

2 TODD BLANCHE: Okay.

3 GHISLAINE MAXWELL: Okay. The '80s.

4 TODD BLANCHE: Okay. So we're talking
5 about the 1980s. And then --

6 GHISLAINE MAXWELL: The -- I was the -- I
7 had a very, very longstanding boyfriend and he had --
8 his brother was dating Mary at the time, and we were
9 all very good friends.

10 TODD BLANCHE: And then Mr. Epstein -- did
11 Mr. Epstein meet Bobby Kennedy through you?

12 GHISLAINE MAXWELL: I don't -- I don't
13 think so, because Mr. Epstein, surprisingly, everyone
14 says everything happened through me. That's just not
15 true. I mean, I think yesterday I explained that he
16 had friends from London, and those are very -- they
17 were what the people would call "fancy."

18 TODD BLANCHE: Yeah.

19 GHISLAINE MAXWELL: They were fancy
20 people. And -- but he had the same types of
21 relationships before I met him in America. So when I
22 met him, he was already, you know, Wexner and he had
23 Henry and he had -- he was -- I don't know if then he
24 was at the -- in the Council of Foreign Relations,
25 but he was friends with Ace and, you know, like he

1 was -- he was well established.

2 TODD BLANCHE: Yeah.

3 GHISLAINE MAXWELL: He didn't need me.

4 And he was, you know, his -- Eva was, you know, major
5 model. So he had all these modeling connections and
6 friends in that business, long before I met him.

7 TODD BLANCHE: And so the trip that you
8 went on with Mr. Epstein and Bobby Kennedy, was that
9 in the '90s and 2000s when --

10 GHISLAINE MAXWELL: I think it was in
11 the -- it would've been in the -- I want to say '93,
12 '94.

13 TODD BLANCHE: Okay. So a very long time
14 ago.

15 GHISLAINE MAXWELL: A very, very long time
16 ago.

17 TODD BLANCHE: A few years into the --
18 your relationship -- a few years into the time that
19 you knew Mr. Epstein?

20 GHISLAINE MAXWELL: Yes. I mean, I don't
21 want to hold myself to the dates because I really --

22 TODD BLANCHE: No, no. I'm not holding
23 you to dates. I think --

24 GHISLAINE MAXWELL: Because I really don't
25 --

1 TODD BLANCHE: I've said that a lot,
2 because I appreciate we're talking about the '80s and
3 '90s and even the 2000s.

4 GHISLAINE MAXWELL: And I just want you to
5 know, I haven't had any -- I don't have anything to
6 review, so I haven't had any ability to -- the short
7 of my legal material, obviously, which you can -- you
8 know I have, because I came with a box worth, but
9 short of that, I have nothing with which to
10 refresh -- or very limited stuff, I should say, I
11 don't want to say nothing -- to refresh my mind.

12 TODD BLANCHE: I understand that. Do you
13 have any recollection of Mr. Kennedy -- of there
14 being anything inappropriate with Mr. Kennedy and
15 masseuses or young women on the trip you just talked
16 about?

17 GHISLAINE MAXWELL: I never saw anything
18 inappropriate with Mr. Kennedy.

19 TODD BLANCHE: And do you know whether he
20 ever got a massage from one of the masseuses? Do you
21 know either way?

22 GHISLAINE MAXWELL: I do not.

23 TODD BLANCHE: But not something you
24 remember?

25 GHISLAINE MAXWELL: I mean, absolutely

1 not.

2 I mean, he -- well, I mean, yesterday, if
3 I didn't make it clear, I will reiterate it. I
4 never, ever saw any man doing something inappropriate
5 with a woman of any age. I never saw inappropriate
6 habits.

7 Now, I'm not -- I'm not going to say hands
8 or -- I mean, that to me is not inappropriate. Now,
9 somebody's inappropriate and mine may be different,
10 but --

11 TODD BLANCHE: Yep.

12 GHISLAINE MAXWELL: -- we're not talking
13 about anything that's -- resembles the accusations
14 that we've discussed here. So that would be an -- a
15 flat no to any man.

16 TODD BLANCHE: Did your or Mr. Epstein's
17 relationship with Mr. -- with Bobby Kennedy continue
18 into the 2000s, as far as you know?

19 GHISLAINE MAXWELL: I would say yes.

20 TODD BLANCHE: Um --

21 GHISLAINE MAXWELL: Well, mine, yes. I
22 don't --

23 TODD BLANCHE: Your's -- with you. Okay.

24 GHISLAINE MAXWELL: With me, for sure.

25 TODD BLANCHE: Do you know whether

1 Mr. Epstein and Mr. Kennedy, Bobby Kennedy, continued
2 to have relationships into the 2000s?

3 GHISLAINE MAXWELL: I have no personal
4 knowledge of that. I mean, I would -- because --

5 TODD BLANCHE: Yeah, no personal knowledge
6 is fine.

7 GHISLAINE MAXWELL: Another thing is that
8 everyone puts us together like a monolith.

9 TODD BLANCHE: Yeah.

10 GHISLAINE MAXWELL: He literally had a
11 separate life from me. I literally had a separate
12 life from him. Now, did they say? Well, of course
13 they did. I'm not-- that's -- I'm not crazy.

14 But he kept a lot to himself and he didn't
15 like to share. He was not a sharer. Well, at least
16 not with me.

17 TODD BLANCHE: Mr. Epstein didn't share,
18 you're saying?

19 GHISLAINE MAXWELL: Not with me, no.

20 TODD BLANCHE: Did you -- do you know
21 somebody named Cheryl Mills?

22 GHISLAINE MAXWELL: I do.

23 TODD BLANCHE: Used to work in the White
24 House as a lawyer?

25 GHISLAINE MAXWELL: Yes, I do. Yes.

1 TODD BLANCHE: How do you know Ms. Mills?

2 GHISLAINE MAXWELL: I met Ms. Mills
3 through President Clinton.

4 TODD BLANCHE: Do you remember a --
5 generally, the timeframe that you -- you met her?

6 GHISLAINE MAXWELL: I do, actually. Hang
7 on. I'm sorry. I'm just trying to remember -- I'm
8 trying to get my dates right.

9 DAVID MARKUS: Approximately.

10 GHISLAINE MAXWELL: Well, okay. I can't
11 get my dates right. But it's something you probably
12 can -- going to be in the early 2000s.

13 TODD BLANCHE: Okay.

14 GHISLAINE MAXWELL: So what I don't
15 recall --

16 TODD BLANCHE: So --

17 GHISLAINE MAXWELL: I want to say 2002.
18 I'm going to say 2002, 2003.

19 TODD BLANCHE: So it was after President
20 Clinton left office?

21 GHISLAINE MAXWELL: Oh, yes.

22 TODD BLANCHE: And so it was in the 2000s.

23 GHISLAINE MAXWELL: Definitely.

24 TODD BLANCHE: And how -- what -- how did
25 you meet her? What were the circumstances under

1 which you met Ms. Mills?

2 GHISLAINE MAXWELL: I went on a trip with
3 the President to South America.

4 TODD BLANCHE: With which president?

5 GHISLAINE MAXWELL: Oh, sorry.
6 President Clinton.

7 TODD BLANCHE: Yeah. Okay. Just, you
8 know --

9 GHISLAINE MAXWELL: Sorry.

10 TODD BLANCHE: -- just wanted -- it was --
11 I just wanted to make sure it was clear.

12 Okay. So you went on a trip to -- to
13 where?

14 GHISLAINE MAXWELL: Latin America.

15 TODD BLANCHE: And who -- and so Ms. Mills
16 was on that trip?

17 GHISLAINE MAXWELL: She was.

18 TODD BLANCHE: And President Clinton was
19 on that trip?

20 GHISLAINE MAXWELL: He was.

21 TODD BLANCHE: Who else was on that trip?

22 GHISLAINE MAXWELL: Doug Band.

23 TODD BLANCHE: Who worked with President
24 Clinton?

25 GHISLAINE MAXWELL: Yes.

1 TODD BLANCHE: And was Mr. Epstein?

2 GHISLAINE MAXWELL: No.

3 TODD BLANCHE: And what was the purpose of
4 that trip?

5 GHISLAINE MAXWELL: Well, the President
6 had -- I don't know. I mean, I -- the President met
7 with -- I can't even remember every -- all the, I
8 know, presidents and we were in --

9 TODD BLANCHE: Was this part of President
10 Clinton's work after he left office with the -- with
11 his foundation? Or was -- meaning what --

12 GHISLAINE MAXWELL: I don't think the
13 foundation, when did the --

14 TODD BLANCHE: -- was it something for him
15 or was it --

16 GHISLAINE MAXWELL: When did the -- I
17 don't remember when the Clinton Global Initiative
18 started.

19 So if you date me -- if you give me that
20 date, I can tell you if it was pre or post. Because
21 without that, I can't pin the reason.

22 DAVID MARKUS: Do you remember what it was
23 for or not?

24 GHISLAINE MAXWELL: No. I don't recall.

25 DAVID MARKUS: Okay.