

LCACmax1

1 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

2 -----x  
UNITED STATES OF AMERICA,

3 v.

20 CR 330 (AJN)

4 GHISLAINE MAXWELL,

5 Defendant.

Jury Trial

6 -----x

New York, N.Y.  
December 10, 2021  
8:55 a.m.

8 Before:

9 HON. ALISON J. NATHAN,

10 District Judge

11 APPEARANCES

12 DAMIAN WILLIAMS

United States Attorney for the  
Southern District of New York

13 BY: MAURENE COMEY

14 ALISON MOE

LARA POMERANTZ

15 ANDREW ROHRBACH

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16 HADDON MORGAN AND FOREMAN

Attorneys for Defendant

17 BY: JEFFREY S. PAGLIUCA

18 LAURA A. MENNINGER

-and-

19 BOBBI C. STERNHEIM

-and-

20 COHEN & GRESSER

21 BY: CHRISTIAN R. EVERDELL

22 Also Present: Amanda Young, FBI

Paul Byrne, NYPD

Sunny Drescher,

23 Paralegal, U.S. Attorney's Office

Ann Lundberg,

24 Paralegal, Haddon Morgan and Foreman

LCACmax1

Brown - direct

1 MR. ROHRBACH: No further questions, your Honor.

2 MR. PAGLIUCA: I have no questions of this witness,  
3 your Honor.

4 THE COURT: Thank you, Mr. Brown. You may step down.

5 THE WITNESS: Thank you.

6 (Witness excused)

7 THE COURT: Government may call its next witness.

8 MS. POMERANTZ: The government calls Annie Farmer.

9 THE COURT: Annie Farmer may come forward. Good  
10 morning, Ms. Farmer.

11 ANNIE FARMER,

12 called as a witness by the Government,

13 having been duly sworn, testified as follows:

14 THE COURT: You may be seated. You can remove your  
15 mask and please state and spell your name for the record.

16 THE WITNESS: My name is Annie Farmer, A-n-n-i-e  
17 F-a-r-m-e-r.

18 THE COURT: Members of the jury, I have a limiting  
19 instruction.

20 I anticipate that you'll hear testimony from the next  
21 witness about physical contact that she says she had with  
22 Mr. Epstein and Ms. Maxwell in New Mexico. I instruct you that  
23 the alleged physical contact she says occurred with Mr. Epstein  
24 and Ms. Maxwell in New Mexico was not, quote, illegal sexual  
25 activity, end quote, as the government has charged in the

LCACmax1

A. Farmer - direct

1 indictment. I'll give you more instructions on the legal term,  
2 quote, illegal sexual activity, end quote, at the end of the  
3 case. However, to the extent you conclude that her testimony  
4 is relevant to the issues before you, you may consider it, but  
5 you may not consider this testimony as any kind of reflection  
6 on Mr. Epstein's nor Ms. Maxwell's character or propensity to  
7 commit any of the crimes charged in the document.

8 Ms. Pomerantz, you may inquire.

9 MS. POMERANTZ: Thank you, your Honor.

10 DIRECT EXAMINATION

11 BY MS. POMERANTZ:

12 Q. Good morning.

13 A. Good morning.

14 Q. How old are you?

15 A. I'm 42 years old.

16 MS. POMERANTZ: Your Honor, at this time, I would ask  
17 that the jurors be permitted to take out their binders and turn  
18 to Government Exhibit 13, which is in evidence under seal, and  
19 I would ask that the witness also look at Government Exhibit  
20 13.

21 THE COURT: Ms. Menninger, without objection?

22 MS. MENNINGER: Sorry, your Honor. One moment.

23 THE COURT: That's okay.

24 MS. MENNINGER: No objection, your Honor.

25 THE COURT: Members of the jury, you could open your

LCACmax1

A. Farmer - direct

1 binder to GX13 and direct the witness to open to GX13.

2 Q. What is Government Exhibit 13?

3 A. It's a copy of my birth certificate.

4 Q. Directing your attention on the first line towards the top  
5 right, is that the date of your birth?

6 A. Yes, that's correct.

7 MS. POMERANTZ: Your Honor, we can put that away now.

8 THE COURT: You can put down your binders. Thank you.

9 Q. In what state were you born?

10 A. Missouri.

11 Q. Where did you grow up?

12 A. I moved around a bit when I was young, but when I was 8  
13 years old, I moved to Arizona and lived there until I graduated  
14 from high school.

15 Q. How far did you go in school?

16 A. I completed my Ph.D.

17 Q. Where did you go to college?

18 A. I went to the University of Pennsylvania for my  
19 undergraduate.

20 Q. Where did you get your Ph.D.?

21 A. University of Texas at Austin.

22 Q. What is your Ph.D. in?

23 A. Educational psychology.

24 Q. What kind of work do you do now?

25 A. I'm a psychologist and I work primarily as a therapist.

LCACmax1

A. Farmer - direct

1 Q. Now, Annie, could you please look around the courtroom and  
2 let us know, you do you see anyone in this courtroom who has  
3 ever given you a massage?

4 A. Yes, I do.

5 Q. Could you please describe where the person you recognize is  
6 sitting and describe an item of clothing the person is wearing.

7 A. She's wearing a brown sweater. She's seated to my right at  
8 the end of the table next to you.

9 MS. POMERANTZ: Let the record reflect that the  
10 witness has identified the defendant.

11 THE COURT: Record may so reflect.

12 Q. How old were you when Maxwell gave you a massage?

13 A. I was 16 years old.

14 Q. We'll talk about that more later, but I want to switch  
15 gears and take a step back.

16 A. Okay.

17 Q. Where did you go to high school?

18 A. I went to high school in Phoenix, Arizona.

19 Q. And when you were about 16 years old, in what state were  
20 you living?

21 A. In Arizona.

22 Q. When you were 16 years old, who did you live with at home?

23 A. I lived with my mom and my little sister, Ashley, and our  
24 dog.

25 Q. Did your dad live with you?

LCACmax1

A. Farmer - direct

1 A. No. My parents are divorced.

2 Q. Was your mother employed?

3 A. She was.

4 Q. What kind of work did she do?

5 A. She was a sales rep for Owen Company, and she worked for  
6 herself -- worked with a couple of different companies.

7 Q. What was your understanding of your family's financial  
8 circumstances when you were 16 years old?

9 A. Money was tight. It had often been a stressor since my  
10 parents were divorced and my mom was supporting my sisters and  
11 I pretty much on her own without much help at all from my  
12 father. So I was in high school and looking forward to college  
13 and worried about money and how that would work out.

14 Q. You mentioned that you lived with your mom and your younger  
15 sister. Do you have any other siblings?

16 A. Yes, I have an older sister.

17 Q. What is your older sister's name?

18 A. Maria Farmer.

19 Q. About how much older than you is your sister?

20 A. She is a little more than nine years older than me.

21 Q. When you were 16 years old, where did Maria live?

22 A. She lived in Manhattan.

23 Q. What did Maria do for a living?

24 A. She had just completed her graduate school in painting and  
25 she was working as a painter, but her employment was with

LCACmax1

A. Farmer - direct

1 Jeffrey Epstein.

2 Q. Did you talk to Maria while she was working for Jeffrey  
3 Epstein?

4 A. I did.

5 Q. How did you speak with Maria?

6 A. We would talk on the phone.

7 Q. Did there come a time when you visited Maria in New York?

8 A. Yes.

9 Q. Approximately when did you visit Maria in New York?

10 A. It was December 1995.

11 Q. Had you visited Maria in New York before December 1995?

12 A. I had not.

13 Q. Why not?

14 A. Money was, as I said, tight for us. So she had graduated,  
15 but we had not been able to attend that. And just affording a  
16 plane ticket was a big deal. So I had not gone to visit her.

17 Q. How was it that you were able to afford this trip in  
18 December 1995 to New York?

19 A. Jeffrey Epstein purchased a ticket for me.

20 Q. What were you hoping to do on this trip to New York?

21 A. I was hoping, one, to see my sister. I was very excited to  
22 see her. It had been some time. I was also hoping to be  
23 acquainted with Jeffrey Epstein. He had said that he was  
24 interested in helping --

25 MS. MENNINGER: Objection. Hearsay, your Honor. It

LCACmax1

A. Farmer - direct

1 wasn't directly to her.

2 THE COURT: Just a moment. Sustained.

3 Q. Annie, did there come a time when your sister spoke to you  
4 about a trip to New York?

5 A. Yes.

6 Q. And what did she tell you about this trip to New York?

7 MS. MENNINGER: Objection. Hearsay, your Honor.

8 MS. POMERANTZ: Your Honor, effect on the listener.

9 THE COURT: Just a moment. Is this the issue we've  
10 discussed?

11 MS. POMERANTZ: I believe so, yes.

12 THE COURT: Okay. Overruled.

13 MS. MENNINGER: If that's the question --

14 THE COURT: I'll listen to the testimony and if it's  
15 beyond that, I'll hear the objection.

16 MS. MENNINGER: Thank you, your Honor.

17 THE COURT: Go ahead. Do you need the question  
18 repeated?

19 THE WITNESS: Yes. Could you repeat that.

20 BY MS. POMERANTZ:

21 Q. What had your sister, Maria, told you about the trip to New  
22 York?

23 A. She had said that Epstein was interested in possibly  
24 helping me with my education, and this was one of the reasons  
25 that he was purchasing my ticket.



LCACmax1

A. Farmer - direct

1 MS. MENNINGER: I renew my objection, your Honor.

2 THE COURT: So I'll overrule the objection, but I will  
3 tell the jury that the testimony that Ms. Farmer just provided  
4 about what was told to her is not being offered for the truth,  
5 but for the limited purpose of the effect on the listener,  
6 Ms. Farmer.

7 Go ahead.

8 BY MS. POMERANTZ:

9 Q. How did you travel to New York?

10 A. I flew, commercially.

11 Q. Who, if anyone, did you travel with to New York?

12 A. No one. I flew by myself.

13 Q. Who paid for your flight to New York?

14 MS. MENNINGER: Objection. Foundation, your Honor.

15 THE COURT: All right. Sustained.

16 Q. Did you pay for your flight to New York?

17 A. I did not.

18 Q. When you were in New York, who, if anyone, did you think  
19 bought you the ticket?

20 A. When I met Epstein --

21 MS. MENNINGER: Objection, your Honor. Hearsay. It's  
22 being offered for that purpose.

23 THE COURT: Additional foundation questions are  
24 required.

25 MS. POMERANTZ: Your Honor, I'll move on for now.

LCACmax1

A. Farmer - direct

1 Thank you.

2 BY MS. POMERANTZ:

3 Q. Where did you stay in New York?

4 A. I stayed with my sister in her apartment.

5 Q. Approximately how long were you in New York?

6 A. I believe it was about a week.

7 Q. When did you go to New York?

8 A. After Christmas in 1995.

9 Q. Did there come a time when you met Jeffrey Epstein during  
10 that trip?

11 A. Yes.

12 Q. Did you meet Maxwell during this trip to New York?

13 A. I did not.

14 Q. How many times did you see Jeffrey Epstein during this trip  
15 in New York?

16 A. There were two different occasions that I recall.

17 MS. POMERANTZ: Ms. Drescher, would you please pull up  
18 for just the witness, the parties, and the Court, what has been  
19 marked for identification as Government Exhibit 101.

20 Q. Annie, do you recognize this?

21 A. Yes.

22 Q. What is it?

23 A. It's my high school photo from my junior year in high  
24 school.

25 Q. Is this a fair and accurate depiction of your physical

LCACmax1

A. Farmer - direct

1 appearance around the time you met Jeffrey Epstein?

2 A. It is.

3 MS. POMERANTZ: Your Honor, the government offers  
4 Government Exhibit 101 in evidence.

5 MS. MENNINGER: No objection, your Honor.

6 THE COURT: Thank you. GX101 is admitted. You may  
7 publish.

8 MS. POMERANTZ: Thank you, your Honor.

9 BY MS. POMERANTZ:

10 Q. How old were you at the time this photograph was taken?

11 A. I was 16 years old.

12 Q. How old were you on the trip to New York?

13 A. I was 16 years old.

14 MS. POMERANTZ: Ms. Drescher, can you please pull up  
15 what's already in evidence as Government Exhibit 112.

16 Q. Annie, do you recognize the person in this photograph?

17 A. Yes.

18 Q. Who is it?

19 A. It's Jeffrey Epstein.

20 MS. POMERANTZ: Ms. Drescher, we can take that down.  
21 Thanks very much.

22 Q. Can you please describe for the jury what happened the  
23 first time you met Jeffrey Epstein.

24 A. Yes. My sister and I went to his home. He had purchased  
25 tickets for us to attend the Phantom of the Opera. So we met

LCACmax1

A. Farmer - direct

1 with him at his home. He was very -- he seemed very friendly  
2 and kind of down to earth, he was dressed casually. We were  
3 dressed up because we were going to the theater and this was a  
4 big deal because I had been very excited about seeing this  
5 production, and he invited us into his home and we talked and  
6 served us champaign. And then, later on, his driver took us to  
7 the play.

8 Q. Just to unpack that a little bit. Where did you meet  
9 Epstein?

10 A. At his home.

11 Q. Can you describe for the jury what the home looked like.

12 A. Yeah, it was a very grand home. I was staying with my  
13 sister in her apartment, which is about, I think, 500 square  
14 feet. So I had never been in a private residence that was so  
15 large in the city before. It was full of very nice things. I  
16 remember sitting across a desk from him, like, you know, a  
17 beautiful large wooden desk in this kind of library room. And,  
18 yeah, it was just a very, you know, a very fancy home.

19 THE COURT: Ms. Farmer, could I ask you to move the  
20 microphone a little bit closer to you if you speak directly  
21 into it.

22 THE WITNESS: Yes. Sorry.

23 THE COURT: Thank you.

24 Q. What, if anything, did Epstein ask you about?

25 A. Well, one thing he asked me about was my plans for after

LCACmax1

A. Farmer - direct

1 high school, and we talked a bit about colleges and he asked me  
2 where I was considering. I remember he suggested that I should  
3 look at UCLA, that that was a place that he liked or had some  
4 connection. And then, yeah, just made, you know, made small  
5 talk.

6 Q. What, if anything, did Epstein talk to you about in terms  
7 of your summer?

8 A. We'd talked about the idea of me going on a trip that  
9 summer, something that would help sort of boost my application  
10 for college, that would look good. So a lot of people at that  
11 time were doing international trips and he said that was  
12 something he thought would be a good idea for me to do and he  
13 would be willing to help me with that.

14 Q. How did you feel when you first met Epstein?

15 A. I was excited. He was, again, very friendly with me, he  
16 seemed down to earth. I had been sort of intimidated by what I  
17 heard of him, but he seemed, you know, very nice when I met  
18 him. What he said about wanting to help me was, of course,  
19 exciting, reassuring.

20 (Continued on next page)

21

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23

24

25

LCAVMAX2

A. Farmer - direct

1 BY MS. POMERANTZ:

2 Q. After you met Epstein in his home, where did you go?

3 A. His driver took my sister and I to see *The Phantom of the*  
4 *Opera*.

5 Q. And who -- just to be clear, who went to the theater?

6 A. My sister Maria and I.

7 Q. Did you see Jeffrey Epstein again during this trip to New  
8 York?

9 A. Yes.

10 Q. Where did you see him again?

11 A. We met him one evening to go see a movie.

12 Q. Who went to the movies?

13 A. My sister, myself, and Jeffrey Epstein.

14 Q. What movie did you see?

15 A. The movie *Five Monkeys*.

16 Q. Who did you sit next to at the movie theater?

17 A. I sat next to Epstein.

18 Q. And where was Maria seated?

19 A. She was seated on his other side.

20 Q. What happened during the movie?

21 A. Initially, when the lights went down, watching the movie.

22 And then at some point he reaches over and puts his hand on the  
23 armrest in between our seats and starts to reach for my hand.

24 And then, you know, caressed my hand; and then, you know,

25 interlocked his hand with mine, holding my hand. And then also

LCAVMAX2

A. Farmer - direct

1 was rubbing my -- I think I had my, you know, legs crossed, so  
2 he was rubbing the bottom of my shoe and then rubbing my foot  
3 and my leg.

4 Q. When he was doing that, what was your reaction?

5 A. I was very surprised. I was very nervous and anxious. I  
6 felt sick to my stomach. It was not something that I was at  
7 all expecting. And I noticed that when he would interact in  
8 some way with my sister, that he would stop doing that. And  
9 then when he -- when the interaction was over, we were  
10 watching -- he was looking forward again, he would return to  
11 touching me.

12 Q. What happened after the movie ended?

13 A. When the movie ended, we got up, left the theater. And he  
14 said good-bye and walked -- my sister and I walked back.

15 Q. Did you tell your sister about what had happened in the  
16 movie theater?

17 A. I did not.

18 Q. Why not?

19 A. I was, number one, very confused about what had happened.  
20 And I knew that she was very protective. And if I told her  
21 that he had done something that aimed to touch me and make me  
22 so uncomfortable, that she would be upset. And that was her  
23 employer. And I thought that would -- you know, she could  
24 possibly lose her job. It would be bad for her. And so I  
25 just -- I decided not to say anything.

LCAVMAX2

A. Farmer - direct

1 Q. When you left the movie theater, did you see Epstein again  
2 while you were in New York?

3 A. No, I did not.

4 Q. At the time you were visiting Epstein when you were 16  
5 years old, what were you hoping to do the following summer?

6 A. I was hoping to go on a trip, to go on an international  
7 trip to help me with maybe getting into a good school.

8 Q. During this time period, did you write in a journal?

9 A. I did.

10 Q. Can you describe your journaling practice at this time.

11 A. I was -- I was not a consistent journaler, but I would just  
12 from time to time write about things happening in my life,  
13 write about my thoughts and feelings about different things,  
14 yeah.

15 MS. POMERANTZ: Ms. Drescher, would you please pull up  
16 for just the witness, the parties, and the Court what's been  
17 marked for identification as Government Exhibit 601.

18 Q. Annie, do you recognize this?

19 A. Yes, this is a notebook I used as a journal at that time in  
20 my life.

21 Q. Is that the cover of the journal?

22 A. That's the cover, yes.

23 Q. Is that a fair and accurate depiction of the cover of your  
24 journal?

25 A. It is.



LCAVMAX2

A. Farmer - direct

1 MS. POMERANTZ: Your Honor, the government offers  
2 Government Exhibit 601 in evidence.

3 MS. MENNINGER: Your Honor, subject to our request  
4 under Rule 106, we have no objection.

5 THE COURT: Okay. 601 is admitted.

6 (Government's Exhibit 601 received in evidence)

7 MS. POMERANTZ: Thank you, your Honor.

8 I would ask if that could be published, please.

9 THE COURT: You may.

10 MS. POMERANTZ: Ms. Drescher, would you please pull up  
11 for just the witness, the parties, and the Court what has been  
12 marked for identification as Government Exhibit 603.

13 Q. Annie, do you recognize this?

14 A. Yes.

15 MS. POMERANTZ: We could scroll to -- I believe there  
16 are two pages. If we could just scroll to the second page.  
17 Thank you.

18 Q. What is this?

19 A. It is an entry from that journal.

20 Q. Is this a fair and accurate depiction of an entry from your  
21 journal?

22 A. It is.

23 MS. POMERANTZ: Your Honor, the government offers  
24 Government Exhibit 603.

25 MS. MENNINGER: Same objection under Rule 106.

LCAVMAX2

A. Farmer - direct

1 THE COURT: GX-603 is admitted.

2 (Government's Exhibit 603 received in evidence)

3 MS. POMERANTZ: Your Honor, I would ask that we  
4 publish it at this time.

5 THE COURT: You may.

6 BY MS. POMERANTZ:

7 Q. Annie, what is the date of this entry?

8 A. January 7th, 1996.

9 Q. Can you please read the entry for the jury.

10 A. Yes.

11 I got back from my trip to New York today. I had such  
12 a great time. It is really depressing to be back home. I feel  
13 like it was a trip that changed my whole outlook on life. I  
14 guess I always feel that way a little bit when I get back  
15 home -- when I get back from trips. But it is overwhelming  
16 this time.

17 Continue reading?

18 I am so ready to be out of high school and in college.  
19 Everything seems so silly, going out, etc. It did a little  
20 before anyway. I even feel a little isolated from my friends.  
21 Before I left, I was on a high of how great my friends were. I  
22 still realize how wonderful they are, but I feel more  
23 independent, like they aren't necessary.

24 Q. You can keep reading.

25 A. Okay. I felt like this when I got back from Mexico, and it

LCAVMAX2

A. Farmer - direct

1 faded quickly, but I have a feeling it is different this time.  
2 New York is such an amazing city. I felt really comfortable  
3 there, like I know that I belong there and would live there at  
4 some point, hopefully soon. I miss Maria so much already. It  
5 seems unfair that I can't see her more often. I feel like I'm  
6 missing so much.

7           There is so much to tell about the trip, but I don't  
8 know where to begin. The best night was when Maria and I saw  
9 *Phantom of the Opera*. We went to Jeff Epstein's house and had  
10 champagne with him. I found him down-to-earth and easy to talk  
11 to. I thanked him so much for the trip, etc.

12           We then took his car. His driver actually took us to  
13 *Phantom*. I didn't know any play could be so moving. I had  
14 seen it before, but still couldn't believe it. I bawled. It  
15 was fantastic. After the play, we walked around the plaza and  
16 went home. It was so much fun.

17           MS. POMERANTZ: Ms. Drescher, would you please pull up  
18 for just the witness, the parties, and the Court what has been  
19 marked for identification as Government Exhibit 604. You can  
20 scroll to the second page. Thank you. And we can go back up  
21 to the top. Thank you, Ms. Drescher.

22 Q. Annie, do you recognize this?

23 A. Yes. It's another entry from the same journal.

24 Q. Is this a fair and accurate depiction of an entry from your  
25 journal?

LCAVMAX2

A. Farmer - direct

1 A. It is.

2 MS. POMERANTZ: Your Honor, the government offers  
3 Government Exhibit 604.

4 MS. MENNINGER: Same 106 objection, your Honor.

5 THE COURT: Okay. Overruled.

6 GX-604 is admitted.

7 (Government's Exhibit 604 received in evidence)

8 Q. What is the date of this entry?

9 MS. POMERANTZ: Oh, your Honor, I'm sorry. Can we  
10 please publish it?

11 THE COURT: You may.

12 MS. POMERANTZ: Thank you.

13 Q. Annie, what is the date of this entry?

14 A. January 25th, 1996.

15 Q. Can you please read the entry for the jury.

16 A. It has been a couple of weeks since I got back, and I have  
17 gotten back into the swing of things. A couple of quick  
18 details about New York I didn't mention earlier. Went to see  
19 *The Dutchess*, a decent play, and *Blue Man Group* tubes Off  
20 Broadway. A really cool production.

21 Went to the flea market, where I got some cool stuff.  
22 Went to Jeffrey Epstein's mansion. Went to The Met, a pretty  
23 fun New Year's Eve party. Went to thrift stores where I got an  
24 amazing dress for prom. It's from the '50s, laced with pink  
25 flowers with rhinestones in the middle all over it. It is my

LCAVMAX2

A. Farmer - direct

1 dream dress.

2 One night we went to the movies with Jeffrey Epstein.  
3 It was -- it was a little weird; one of those things that is  
4 hard to explain. We were sitting next to each other, and he  
5 put out his hand for me to hold, and we were holding hands.  
6 Not weird. Normal. Fine. Then he kind of caressed, rubbed my  
7 arm and shoe, foot. It was one of those things that just gave  
8 me a weird feeling, but wasn't that weird and probably normal.

9 The one thing that kind of weirded me out about it was  
10 he let go of my hand when he was talking to Maria. Oh, well, I  
11 decided it was no big deal. It just made me mad because he's  
12 being so amazing, paying for a summer program for me and  
13 helping me with college. He's so nice and so generous with  
14 everyone. I just didn't want to have any weird feelings about  
15 it. I didn't/couldn't say anything to Maria about it because  
16 she worships him and it would just create problems. I couldn't  
17 tell anyone else because it is not a big deal and I didn't want  
18 to portray him in a bad light. I really don't think it is a  
19 big deal. I think he is just a relaxed guy and likes to flirt  
20 or was being fatherly or something. I know this sounds like me  
21 trying to justify him doing something weird, but it isn't.

22 Continue reading?

23 Q. Let me just pause you right there.

24 Can you explain how you were feeling about Epstein at  
25 the time you were writing about him in your journal.

LCAVMAX2

A. Farmer - direct

1 A. Yeah. I think that I was obviously very conflicted because  
2 I knew what had happened in the movie theater was not normal or  
3 right. And but it had made me feel very uncomfortable. But I  
4 was trying to come up with excuses or justifications in my mind  
5 to make it seem okay, because of what I saw as, you know, him  
6 being such a generous, nice person. And so, you know, I'm  
7 trying to -- I'm trying to make sense of it and I'm having a  
8 hard time.

9 Q. I'll ask you to continue reading from where it says "Right  
10 now."

11 A. Right now my big concern is what I am going to do this  
12 summer. There are so many cool things to do and amazing  
13 places to go. Right now I'm really thinking about doing  
14 something in Africa. It would be incredible. So different, so  
15 beautiful, all the different people. I would love it. I think  
16 I will really be happy doing almost anything.

17 MS. POMERANTZ: Ms. Drescher, we can take that down.  
18 Your Honor, may I have just one moment please?

19 THE COURT: You may.

20 (Counsel conferred)

21 BY MS. POMERANTZ:

22 Q. Annie, after meeting Epstein in New York, did you and  
23 Epstein stay in touch?

24 A. Yes.

25 Q. How did you and Epstein communicate?

LCAVMAX2

A. Farmer - direct

1 A. We spoke on the phone.

2 Q. Approximately how many times did you speak with Epstein by  
3 phone after your trip to New York?

4 A. Approximately two or three times.

5 Q. Did there come a time when you saw Jeffrey Epstein in  
6 person again?

7 A. Yes.

8 Q. Approximately when did you see him?

9 A. In April of 1996, the spring of 1996, I think it was April.

10 Q. Where did you see Epstein?

11 A. In New Mexico.

12 MS. POMERANTZ: Ms. Drescher, would you please pull up  
13 for just the parties, the witness, and the Court what has been  
14 marked for identification as Government Exhibit 102.

15 Q. Annie, do you recognize this?

16 A. Yes.

17 Q. What is this?

18 A. It's a photo of me getting ready for prom.

19 Q. Is this a fair and accurate depiction of your physical  
20 appearance during the spring of 1996?

21 A. Yes.

22 MS. POMERANTZ: Your Honor, the government offers  
23 Government Exhibit 102.

24 MS. MENNINGER: No objection, your Honor.

25 THE COURT: Thank you. GX-102 is admitted.

LCAVMAX2

A. Farmer - direct

1 (Government's Exhibit 102 received in evidence)

2 MS. POMERANTZ: Your Honor, may we publish at this  
3 time?

4 THE COURT: You may.

5 Q. Annie, how old were you at the time this photograph was  
6 taken?

7 A. I was 16 years old.

8 Q. Where was the photograph taken?

9 A. In my apartment.

10 Q. Who invited you on this trip to New Mexico?

11 A. Epstein invited me.

12 Q. How did you learn you were going to be allowed to go on  
13 this trip to New Mexico?

14 A. My best recollection is from my mom, that we had talked  
15 about it.

16 Q. Who, if anyone, did you understand you would be seeing in  
17 New Mexico?

18 MS. MENNINGER: Objection.

19 Foundation, your Honor, hearsay or not.

20 THE COURT: Sustained.

21 Q. In the spring of 1996, did there come a time when you  
22 learned that you would be going to New Mexico?

23 A. Yes.

24 Q. I think you mentioned you learned about that from your  
25 mother; is that right?



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A. Farmer - direct

1 A. That's correct.

2 Q. Based on your conversations with your mother, who did you  
3 understand you would be seeing in New Mexico?

4 MS. MENNINGER: Objection.

5 Hearsay, your Honor.

6 THE COURT: Sustained.

7 MS. POMERANTZ: Your Honor, this is not being offered  
8 for the truth.

9 THE COURT: Sustained.

10 MS. POMERANTZ: May I have one moment?

11 THE COURT: You may.

12 (Counsel conferred)

13 MS. POMERANTZ: Your Honor, may we approach?

14 THE COURT: You may.

15 (Continued on next page)

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A. Farmer - direct

1 (At sidebar)

2 MS. POMERANTZ: Thank you, your Honor.

3 This information is being asked not for the truth of  
4 the matter being asserted, but for her state of mind for what  
5 was in her mind at the time that she was going to New Mexico,  
6 why she felt comfortable, why she felt more comfortable going  
7 to this trip. It's not being offered for the truth of the  
8 matter; it's being offered for what her state of mind was when  
9 she was going on this trip to New Mexico.

10 MS. MENNINGER: Your Honor, this is backdoor hearsay.

11 THE COURT: It is backdoor hearsay.

12 You can ask her about going on the trip, why she went  
13 and why she was comfortable. But to the extent you're  
14 eliciting -- which you clearly are -- hearsay as to what her  
15 mother told her about who would be there, objection sustained.

16 MS. POMERANTZ: Okay.

17 MS. MENNINGER: Her mother is testifying; so if  
18 there's a conversation between Epstein and her mother, I  
19 understand that that would perhaps come in through the mother.

20 THE COURT: Right.

21 MS. POMERANTZ: Okay. Thank you, your Honor.

22 THE COURT: Counsel, the other thing you can say is  
23 after you had your conversation with your mother, did you then  
24 go to New Mexico. And again, you can ask her about her own  
25 experience, but not elicit the hearsay of what her mother told

LCAVMAX2

A. Farmer - direct

1 her.

2 MS. MENNINGER: Your Honor, just to the extent it's  
3 why she went, it's, I understand after the conversation with  
4 the mother, I went to New Mexico. But if it's the content from  
5 the mother to her, that's where it gets into the hearsay piece.

6 MS. COMEY: Your Honor, just to clarify, the jury just  
7 heard this witness say she felt uncomfortable around Jeffrey  
8 Epstein; and that she knew something was wrong. The point of  
9 this is not to give the truth of what the mother said, but to  
10 explain why she was willing to go back to see Jeffrey Epstein  
11 again. That is all we're trying to elicit.

12 THE COURT: You're trying to elicit that her mother  
13 told her that Maxwell would be there, which is for the truth  
14 and hearsay. In any event, because it is central to the  
15 question coming in as hearsay, there's a 403 issue. I think  
16 you can get this -- you can get who was there, etc., but not  
17 what her mother told her for the truth, which is, I think,  
18 plainly what you're trying to do.

19 MS. MOE: Your Honor, I can be more precise.

20 I think the questions would be, Did you feel  
21 comfortable going to New Mexico? Why did you feel comfortable  
22 going to New Mexico? And then we wouldn't object to a limiting  
23 instruction. It's not offered for the truth, it's to explain  
24 the progress of events and why she would feel comfortable doing  
25 something like that.

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A. Farmer - direct

1 THE COURT: Counsel, there's a limit, and hearsay is  
2 the limit, and this is a central question. You have the  
3 witness, you have Maria Farmer coming to testify. I presume,  
4 although I don't know, that she can testify Ms. Farmer was  
5 there in New Mexico; correct?

6 MS. MOE: Yes, your Honor.

7 THE COURT: And then you can ask her how she felt  
8 about that. But you can't do it through hearsay.

9 Sustained.

10 (Continued on next page)

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LCAVMAX2

A. Farmer - direct

1 (In open court)

2 BY MS. POMERANTZ:

3 Q. Annie, did you travel to New Mexico?

4 A. I did.

5 Q. How did you travel to New Mexico?

6 A. I flew commercially.

7 Q. Did you pay for your ticket to New Mexico?

8 A. I did not.

9 Q. Did you thank anyone for paying for your ticket to New  
10 Mexico?

11 MS. MENNINGER: Objection, your Honor.

12 Foundation. Hearsay.

13 THE COURT: Foundation, overruled. Overruled.

14 A. I thanked Epstein when I got to New Mexico.

15 Q. Who, if anyone, did you travel with to New Mexico?

16 A. I traveled alone.

17 Q. Approximately when did you go to New Mexico?

18 A. The spring of 1996; I believe it was April.

19 Q. And approximately how long were you in New Mexico?

20 A. It was a weekend trip.

21 Q. When you landed in New Mexico, what happened next?

22 A. There was a man at the airport that had a sign with my name  
23 on it, and so I went with him. He was a driver. And he drove  
24 me out to the ranch.

25 Q. You mentioned the ranch. Can you describe the ranch for

LCAVMAX2

A. Farmer - direct

1 the jury.

2 A. Yeah. It was a large -- a large piece of property in New  
3 Mexico, so kind of a desert landscape. And there were  
4 different sections. And there was one that had like an old  
5 movie set, like a western movie set on it. And then there was  
6 a portion where we were staying where there's a small  
7 residence.

8 THE COURT: I'd ask you again, Ms. Farmer, if you can  
9 maybe shift it a little bit closer to you.

10 Thank you. Perfect. Thank you.

11 Q. Who, if anyone, did you meet at the ranch?

12 A. When I arrived, I had met -- I mean, I saw Epstein, and  
13 then I met Ghislaine Maxwell.

14 Q. What did Maxwell look like?

15 A. She was trim, attractive woman, well-dressed, dark hair.

16 Q. About how old did Maxwell seem?

17 A. I believe she was in her thirties, so at the time she was  
18 an adult.

19 MS. POMERANTZ: Ms. Drescher, can we please pull up  
20 what's in evidence as Government Exhibit 115.

21 Q. Annie, do you recognize the person in this photograph?

22 A. I do.

23 Q. Who is it?

24 A. Ghislaine Maxwell.

25 MS. POMERANTZ: Ms. Drescher, we can pull that down.

LCAVMAX2

A. Farmer - direct

1 Thank you.

2 Q. What did Maxwell sound like?

3 A. She had a British accent and she was well-spoken and  
4 articulate. And she was enthusiastic in greeting me and  
5 speaking with me.

6 Q. Annie, had you wanted to go to New Mexico at the time?

7 A. No, I was not eager to go to New Mexico.

8 Q. What, if anything, made you feel more comfortable about  
9 going to New Mexico?

10 MS. MENNINGER: Objection. Hearsay, your Honor.

11 THE COURT: I'm going to overrule here and I'll adopt  
12 a limiting instruction.

13 MS. POMERANTZ: Thank you, your Honor.

14 A. I had been told that Maxwell would be in New Mexico with  
15 Epstein; and so that made me feel more comfortable. Basically,  
16 after what had happened in the movie theater in New York, I did  
17 not want to be alone with him. But I thought that Ghislaine  
18 was his romantic partner, and I didn't think he would do  
19 anything like that while they were together.

20 MS. MENNINGER: Your Honor, I think we need to say who  
21 told her that.

22 THE COURT: Okay. You may ask and then I'll give the  
23 instruction.

24 Q. Who told you that?

25 A. I was told by my mother.

LCAVMAX2

A. Farmer - direct

1 THE COURT: Members of the jury, the testimony the  
2 witness provided about what her mother told her is not being  
3 offered for the truth, but for the limited purposes of the  
4 effect on the listener.

5 Go ahead.

6 MS. POMERANTZ: Thank you, your Honor.

7 BY MS. POMERANTZ:

8 Q. Based on your observations that weekend, what was your  
9 understanding at the time of the relationship between Epstein  
10 and Maxwell?

11 A. I believed that they were romantic partners. They were  
12 very intimate with each other in terms of touching each other  
13 and the way that they spoke with each other and interacted; it  
14 was what I had seen from couples.

15 Q. What happened after you got to the ranch?

16 A. When I first arrived, I remember we did a little bit of a  
17 tour, where I saw this portion I mentioned where there was this  
18 western movie set and, I believe, some horses. And, you know,  
19 I was, I guess, oriented a little bit to the property.

20 Q. Where did you stay at the ranch?

21 A. In a small residence.

22 Q. Who else stayed in that residence?

23 A. Epstein and Maxwell.

24 Q. Was anyone else staying in that area of the ranch?

25 A. No.



LCAVMAX2

A. Farmer - direct

1 Q. Did you see staff at the ranch that weekend?

2 A. Yes, I did see like a couple of men that I believe were  
3 ranch hands or caretakers for the property; and the driver, you  
4 know, I mentioned who took me to the airport.

5 Q. Apart from staff and Epstein and Maxwell, was anyone else  
6 staying at the residence?

7 A. No.

8 Q. What was your reaction at the time about being at the ranch  
9 with only Epstein and Maxwell?

10 A. I think it was -- you know, it seemed unusual in a way,  
11 being that I was a teenager, to be spending this time with  
12 them. But I also -- there is a way in which it sort of made me  
13 feel special that they would want to spend this time with me.  
14 So I think it was a mixed bag.

15 Q. Based on your initial conversations with Maxwell, did you  
16 have the impression that she was surprised to see you or did  
17 she seem to expect you?

18 A. She did not seem surprised to see me at all. She -- yeah,  
19 she seemed to know who I was and be excited to be meeting me.

20 Q. What was your impression of Maxwell?

21 A. She was very outgoing and talked a bit of engaging with me,  
22 so I enjoyed meeting with her and talking with her.

23 Q. What, if anything, did you and Maxwell talk about?

24 A. She was just, you know, making conversation with me about  
25 my life, asking me -- I remember we talked a bit about my

LCAVMAX2

A. Farmer - direct

1 school, and I was writing a paper about some British authors.  
2 And I remember bringing this up to her and talking to her about  
3 that. And I think just, you know, kind of general life things,  
4 what I was doing.

5 Q. You mentioned that Epstein and Maxwell gave you a tour of  
6 the ranch. Did you leave the ranch that weekend?

7 A. We did.

8 Q. Where did you go?

9 A. We went into town, and I remember we did a little bit of  
10 shopping. We went to a natural food store of some sort. And  
11 Ghislaine offered to buy me some product. I remember she  
12 bought me this henna hair lightening cream of some kind. And  
13 then on that same outing, we went to a western wear store where  
14 they had me try on cowboy boots and purchased a pair of cowboy  
15 boots for me.

16 Q. When you said "we went shopping," who went shopping?

17 A. Epstein, Maxwell, and myself.

18 Q. What did the cowboy boots look like?

19 A. They were black leather pointy standard cowboy boots.

20 Q. Who bought the boots for you?

21 A. Epstein.

22 Q. And who was present at the time of the boots being  
23 purchased?

24 A. Maxwell as well.

25 Q. Did you keep the cowboy boots?

LCAVMAX2

A. Farmer - direct

1 A. I -- yes, I did.

2 Q. What was your reaction at the time that the cowboy boots  
3 were purchased for you?

4 A. It was -- I remember it seemed -- because they cost over  
5 \$100, it seemed they were very expensive to me. And so, you  
6 know, I was very grateful; although I didn't really have any  
7 reason to be wearing cowboy boots, so it wasn't something I had  
8 been seeking out or wanting. But the -- you know, I was  
9 gracious about it.

10 Q. Did there come a time when you left the ranch again?

11 A. Yes.

12 Q. Where did you go?

13 A. We went to the movies.

14 Q. Who went to the movies?

15 A. Sorry. Maxwell, Epstein, and I.

16 Q. Did you want to go to the movies?

17 A. No. I think because of what had happened in the movie  
18 theater in New York, I was -- that was not something I was  
19 eager to do. But I imagined it would be different this time  
20 because Maxwell was there.

21 Q. What, if anything, happened before you went in to watch the  
22 movie?

23 A. Oh, so the movie theater is in sort of a mall area, and  
24 we -- there was a ticket counter and they purchased tickets and  
25 we were waiting to go in. And Epstein and Maxwell were being

LCAVMAX2

A. Farmer - direct

1 very, like, playful with each other and kind of grabbing each  
2 other. And Maxwell went to, like, pull Epstein's pants down a  
3 little bit and, you know, sort of like depantsing someone,  
4 which seemed very odd to me at the time because they were  
5 adults and this is the kind of thing, you know, I would expect  
6 more from younger people. And so I was kind of, you know, just  
7 caught off guard by it and thought it seemed odd.

8 Q. What movie did you see?

9 A. We saw Primal Fear.

10 Q. How were you, Epstein, and Maxwell seated during the movie?

11 A. I was seated next to Epstein, and I believe Maxwell was on  
12 his other side.

13 Q. What, if anything, happened during the movie?

14 A. It was very similar to the first time that I went to the  
15 movies with Epstein in that he right away began to hold my hand  
16 and caress it and, you know -- and rub on my -- on my foot and  
17 on my arm.

18 Q. For approximately how much of the movie did Epstein touch  
19 you in the way you just described?

20 A. Throughout the majority of the movie. And he also had  
21 popcorn, I think, and was, you know, eating. But it was -- he  
22 did not -- unlike in New York, he didn't seem to be concerned  
23 about hiding those behaviors. He was very blatant in doing it  
24 throughout the film.

25 Q. How did what Epstein do in the movie theater in New Mexico

LCAVMAX2

A. Farmer - direct

1 compare with what he did in the movie theater in New York?

2 MS. MENNINGER: Objection.

3 Asked and answered, your Honor.

4 THE COURT: Overruled.

5 A. Yeah. I'd say it was very similar, except for more  
6 blatant -- like not -- he wasn't -- he wasn't stopping. It was  
7 just this is what he was doing.

8 Q. What else do you recall happening in New Mexico?

9 A. So we were at the movies.

10 Another experience after we were back at the residence  
11 was that it was decided that I would learn how to give Epstein  
12 a foot massage. Maxwell wanted to show me how to rub his feet;  
13 and so that was something I should learn how to do. And so she  
14 sat and held one of his feet, and then instructed me to hold  
15 his other foot and showed me how to rub it.

16 Q. Where were you when this took place?

17 A. In the same little area. There was a couch. I think it  
18 was kind of like a den type room. And yeah.

19 Q. Was this back at the ranch?

20 A. Back at the ranch, yeah. Sorry.

21 Q. Did you know how to give foot massages at that point?

22 A. No, I'd never been shown how to do that.

23 Q. What, if anything, did Epstein have on his feet during the  
24 massage?

25 A. He was not wearing any socks or anything; it was just

LCAVMAX2

A. Farmer - direct

1 his -- his bare feet.

2 Q. How did you know how to give him a massage?

3 A. I just -- you know, I watched what she was doing. And she  
4 instructed me, you know, you pull back his big toe, rub this  
5 part of his foot, you know. And so I did what she told me.

6 Q. What did Epstein do while you were rubbing his feet?

7 A. He seemed, you know, to be enjoying it. He sort of made  
8 like groaning noises like he was -- it felt good to him.

9 Q. How did you feel while you were rubbing his feet?

10 A. I felt very uncomfortable. I did not want to be touching  
11 his feet. And also just the whole situation made -- I wanted  
12 to stop and I was hoping it would be over quickly.

13 Q. What, if anything, did Maxwell ask you about your  
14 experience with massages during this trip?

15 A. She asked me if I'd ever had a professional massage and,  
16 you know, talked about what a lovely experience it was and how  
17 enjoyable it was to get a massage.

18 Q. What, if anything, did Maxwell do next?

19 A. She said that, you know, she wanted me to have that  
20 experience, and she would be happy to give me a massage. And  
21 so encouraged me to say that, yes, okay, I would get a massage  
22 from her.

23 Q. Did Maxwell give you a massage?

24 A. She did.

25 Q. Where in the house did Maxwell give you a massage?

LCAVMAX2

A. Farmer - direct

1 A. My best recollection is that she set up a table in the room  
2 where I was staying.

3 Q. You said she set up a table. Can you describe the table.

4 A. It was, I think, a standard kind of massage table that's  
5 portable that has the legs that, you know, can be extended and  
6 has padding on top.

7 Q. What were you wearing during the massage?

8 A. Nothing.

9 Q. Why did you -- why were you wearing nothing during the  
10 massage?

11 A. She told me to get undressed.

12 Q. When you say "she," who are you referring to?

13 A. I'm sorry. Maxwell.

14 Q. What happened during the massage?

15 A. She, you know, said to get undressed and lay under the  
16 sheet on the massage table. And I did. And then she, you  
17 know, started rubbing my body and rubbing my back and my legs.  
18 And while she's doing this, she's just making -- you know,  
19 making small talk. And then at some point in the massage she  
20 had me roll over so I was laying on my back.

21 Q. And what happened once you were laying on your back?

22 A. She pulled the sheet down and exposed my breasts and  
23 started rubbing on my chest and on my -- on my upper breasts.

24 Q. When she touched your breasts, what was your reaction?

25 A. I mean, once she pulled down the sheet, I felt like kind of

LCAVMAX2

A. Farmer - direct

1 frozen; because I knew that that was very -- just, it didn't  
2 make sense to me that that would happen, and I was surprised.  
3 And, you know, I just wanted to -- badly to get off of the  
4 table and have this massage be done.

5 Q. Who was present during the massage?

6 A. It was Maxwell and I. But the door to the room was open.  
7 And I was fearful, especially at that moment, that Epstein -- I  
8 just had the sense that he could see me. But I don't have a  
9 memory of him standing nearby or of seeing his face, but I  
10 just -- I had this sense that he might be able to.

11 Q. What else, if anything, happened during your weekend in New  
12 Mexico?

13 A. I guess the other memory that stands out the most is being  
14 in bed in the morning, and suddenly Epstein kind of opening my  
15 door and sort of bounding into the room in this sort of playful  
16 way and saying that he wanted to cuddle. And so he climbed  
17 into bed with me and kind of laid behind me and reached his  
18 arms around me and he pressed his body into me.

19 Q. Did you want to cuddle with Epstein?

20 A. No.

21 Q. Did you tell him you did not want to cuddle with him?

22 A. No.

23 Q. Why not?

24 A. I was very aware at that time that I was, you know, very  
25 isolated; that, you know, I was on this ranch with these two



LCAVMAX2

A. Farmer - direct

1 people and, you know, no one's safe for a great distance. And  
2 so I just had thought, like, I just need to get through this  
3 and then it will be fine. And so I just -- you know, I didn't  
4 say anything.

5 Q. Did Epstein cuddle you?

6 A. Yeah.

7 Q. Can you explain what happened.

8 A. Yeah. He just -- you know, as I said, he kind of had his  
9 arms around me and I felt, again, kind of frozen. And then I  
10 thought I have to have an excuse to get out of this. And so I  
11 just said I needed to go to the bathroom. And it was in my  
12 bedroom area and there was a bathroom near. And so I just made  
13 the excuse and got out of bed and went into the bathroom and  
14 shut the door.

15 Q. What did you do while you were in the bathroom?

16 A. I just, you know, waited. And I don't remember how long I  
17 was in there, you know, I just remember thinking, like, I  
18 wanted to be in there long enough that this hopefully situation  
19 would be over.

20 Q. What was your reaction to the series of events in New  
21 Mexico that you've just testified about culminating with  
22 Epstein getting into bed with you?

23 A. My reaction at that time?

24 Q. At that time.

25 A. Yeah, I just wanted -- I wanted the weekend to be over. I

LCAVMAX2

A. Farmer - direct

1 felt very -- like, I thought I had been brought there because  
2 of, you know, one set of reasons; like, I thought that he was  
3 interested and they were both interested in me as, like, a  
4 student; that they may want to help in an academic way. So I  
5 was trying to be sort of impressive in that way and talk about  
6 things that they wanted to hear about. And all these  
7 experiences made me feel that they had a very different  
8 interest in me. And so it was extremely kind of disorienting  
9 and I just was wanted to be done with it.

10 Q. What, if anything, did you discuss with Maxwell during your  
11 last day on the ranch in New Mexico?

12 A. What I remember about that, just this final conversation  
13 was that I was sort of trying to reengage with her around,  
14 like, this academic stuff. And I had brought, like, three by  
15 five note cards for this paper that I was writing where I had  
16 little, like, facts on them. And we were sitting outside on  
17 what seemed like kind of a deck area. And I was going through  
18 them and I was trying to get her to talk to me about them, I  
19 think, in a way, like, to make myself feel better, like, maybe  
20 they did care about that. And she just seemed like very  
21 disinterested and kind of like, you know, she didn't care.

22 Q. Did you say good-bye to Epstein and Maxwell before you left  
23 New Mexico?

24 A. Yes.

25 Q. Where did you go when you left New Mexico?

LCAVMAX2

A. Farmer - direct

- 1 A. I flew home to Phoenix.
- 2 Q. How did you get to the airport?
- 3 A. I think it was the same driver, but a driver drove me back  
4 to the airport.
- 5 Q. How did you fly home to Arizona?
- 6 A. Commercially by myself.
- 7 Q. Who picked you up from the airport?
- 8 A. My mom.
- 9 Q. You testified earlier about your journal. Did you write in  
10 your journal about your trip to New Mexico?
- 11 A. No.
- 12 Q. Why not?
- 13 A. I think I just really didn't want to think about it; and,  
14 you know, writing would be a way of, like, me having to think  
15 more about what had happened. And I just wanted to put it out  
16 of my mind.
- 17 Q. You testified earlier about boots that Maxwell and Epstein  
18 purchased for you during a shopping trip in New Mexico. You  
19 said that you had kept the boots; is that right?
- 20 A. Yes. Yeah.
- 21 Q. Why did you keep the boots?
- 22 A. I think initially I just sort of got home and shoved them  
23 to the back of my closet. And then when I graduated from high  
24 school, my mom moved. And everything in my closet I just  
25 packed into boxes. And they were in her storage for a number

LCAVMAX2

A. Farmer - direct

1 of years.

2 And then when I interviewed with agents about this in,  
3 I think, late 2006/early 2007, they asked me if I still had  
4 those, and I didn't know. So at some point I found them next  
5 time I visited my mom. And I held onto them for some time,  
6 hoping maybe, you know, they would want them. And then when  
7 that didn't seem to come to pass, I just thought, I live in  
8 Texas, now I have these boots, and I'm going to kind of reclaim  
9 them and use these boots.

10 Q. Did you start wearing those boots?

11 A. I did wear those boots.

12 Q. I want to change topics.

13 Where, if anywhere, did you go during the summer of  
14 1996?

15 A. I went on a trip to Thailand and Vietnam.

16 Q. How long were you in Thailand and Vietnam?

17 A. For six weeks.

18 Q. What were you doing in Thailand and Vietnam?

19 A. It was like a cultural emerging trip/service trip. So we  
20 built like a community building, and we did some teaching in  
21 schools, and then just did some hiking and kind of fun things.

22 MS. POMERANTZ: Ms. Drescher, would you please pull up  
23 for just the witness, the parties, and the Court what has been  
24 marked for identification as Government Exhibit 103.

25 Q. Annie, do you recognize this?

LCAVMAX2

A. Farmer - direct

1 A. Yes, it's a photo of me on that trip to Thailand.

2 Q. Is this a fair and accurate depiction of your physical  
3 appearance during the summer of 1996?

4 A. It is.

5 MS. POMERANTZ: Your Honor, the government offers  
6 Government Exhibit 103 in evidence.

7 MS. MENNINGER: No objection.

8 THE COURT: GX-103 is admitted. You may publish.

9 (Government's Exhibit 103 received in evidence)

10 MS. POMERANTZ: Thank you, your Honor.

11 Q. Annie, how old were you at the time this photograph was  
12 taken?

13 A. I was 17.

14 Q. Had you turned 17 over the summer?

15 A. Yes.

16 Q. And where was this photograph taken?

17 A. It was in Thailand.

18 MS. POMERANTZ: We can take that down, Ms. Drescher.

19 Thank you.

20 Q. Who paid for your trip to Thailand and Vietnam?

21 A. Epstein.

22 Q. When you left Thailand and Vietnam, where did you go?

23 A. I went back to Phoenix.

24 Q. And when you got back, did you want to see Maxwell and  
25 Epstein again?

LCAVMAX2

A. Farmer - direct

1 A. No.

2 Q. At that point, how were you feeling about Maxwell and  
3 Epstein?

4 A. I think, you know, again, I felt conflicted because I had  
5 had -- I had been on this trip, which is something I never  
6 could have done without, you know, Epstein's support. But I --  
7 so I felt I should be grateful for that.

8 But the experience that I had with Maxwell and Epstein  
9 in New Mexico was so uncomfortable that I didn't -- you know, I  
10 was very much hoping I would never have to be around them  
11 again. Then I felt sort of guilty about that because of -- you  
12 know, again, because they had paid for this trip.

13 Q. From that point on, did you have any contact with Maxwell  
14 and Epstein?

15 A. I did not.

16 Q. Did there come a time when you told someone about your  
17 experiences with Maxwell and Epstein?

18 A. Yes.

19 Q. Who did you first tell?

20 A. I had a brief conversation with my mom just acknowledging  
21 that something uncomfortable had happened, but I didn't go into  
22 any details with her about that.

23 Q. What did you tell your mom?

24 MS. MENNINGER: Objection, your Honor. Hearsay.

25 THE COURT: I'll hear from you, counsel.

LCAVMAX2

A. Farmer - direct

1 (At sidebar)

2 THE COURT: Is this not a prior consistent statement  
3 that was litigated or discussed?

4 MS. POMERANTZ: This is a prior consistent statement,  
5 your Honor.

6 MS. MENNINGER: Your Honor, I don't believe that we  
7 have impeached her yet or called her story into question in  
8 opening about this issue. So I'm a little -- I understand that  
9 eventually it may be, if I do impeach her.

10 THE COURT: The opening questioned the veracity of all  
11 of the accusers.

12 MS. MENNINGER: Not on every point, your Honor. I  
13 mean --

14 THE COURT: Okay.

15 MS. MENNINGER: Not that she was there, for example,  
16 or anything like that. So I don't believe that it's been  
17 opened, and I think it's just bolstering.

18 THE COURT: Well, is the statement just that she's  
19 going to be there or what's -- what is the anticipated  
20 statement?

21 MS. MENNINGER: Actually, my reading of the discovery  
22 is that she told her mom, I wasn't raped. And so if that's  
23 what is planned to be elicited, that's going to be a problem  
24 for a lot of other reasons that have been litigated.

25 THE COURT: Is that what she's going to say?

LCAVMAX2

A. Farmer - direct

1 MS. POMERANTZ: My understanding, your Honor, of what  
2 she's going to say is that she didn't want to talk about it;  
3 that something had happened. There are times where she has  
4 used that word. In our several last meetings she has not used  
5 that word. But she has said, I didn't want to get into details  
6 with my mom. I told her something had happened.

7 MS. MENNINGER: The quote in discovery is, I told her  
8 I wasn't raped, and I don't want this to ruin my life.

9 So I'm a little worried about the "rape" word being  
10 used by the witness in this context, especially because we've  
11 litigated extensively that consent and --

12 MS. POMERANTZ: Your Honor, the defense has put the  
13 memory of the witnesses, of the victims, at issue from the  
14 start at their opening, and they are incentives.

15 THE COURT: I'm overruling.

16 It's an anticipated prior consistent statement based  
17 on the clear attack on the credibility of the allegations of  
18 all of the alleged victims. We'll see what comes. A statement  
19 that she wasn't raped is not suggesting that she was raped;  
20 that's suggesting the opposite.

21 MS. STERNHEIM: Judge, if I might add, it's the use of  
22 the word and knowing how inflammatory it is and the  
23 restrictions put on it to now allow them to even suggest, that  
24 is extremely loaded and extraordinarily prejudicial.

25 This has nothing to do with the opening with regard to



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A. Farmer - direct

1 this witness at all, and it's extremely far afield.

2 MS. MENNINGER: I can tell your Honor we're not  
3 challenging the statements that she had a foot massage, a body  
4 massage, and so forth. So there may be some of the details of  
5 her memory that are off, but we did not put in to challenge  
6 that she had those contacts. That's why we worded the limiting  
7 instruction "the physical contact." And to use the word  
8 "rape," when she's above the age of consent --

9 THE COURT: She's saying not raped. It's the opposite  
10 of raped. It's not raped.

11 MS. MENNINGER: Well, your Honor --

12 THE COURT: I'll allow the question as a prior -- I'm  
13 overruling the objection because it's an anticipated prior  
14 consistent statement in which the credibility of all of the  
15 witnesses as to what occurred has been attacked.

16 I don't think this needs to be sealed.

17 MS. POMERANTZ: No.

18 THE COURT: Okay. Not sealed.

19 (Continued on next page)  
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LCAVMAX2

A. Farmer - direct

1 (In open court)

2 BY MS. POMERANTZ:

3 Q. Annie, what did you tell your mom?

4 A. I had told my mom that I was not raped and I didn't want to  
5 talk about it.

6 Q. When did this conversation happen?

7 A. This was shortly after I returned from the trip from  
8 Thailand and Vietnam, so late summer of 1996.

9 Q. If I could just ask you to speak into the microphone.

10 A. Yeah. Sorry. Late summer of 1996.

11 Q. Thank you.

12 Who else, if anyone, did you tell what had happened to  
13 you with Maxwell and Epstein?

14 A. Later in that fall, I started dating someone named Dave  
15 Mulligan. And I talked to him at some point a little bit about  
16 what had happened at the ranch.

17 Q. When did you meet Dave?

18 A. I met him at prom, actually, my junior year; so earlier in  
19 the spring of 1996.

20 Q. And when did you start dating him?

21 A. In that fall, I think maybe September/October.

22 Q. And did you tell Dave about what had happened with Maxwell  
23 and Epstein?

24 A. I did.

25 Q. Did there come a time when you spoke with members of the

LCAVMAX2

A. Farmer - direct

- 1 media about your experiences with Epstein and Maxwell?
- 2 A. Yes.
- 3 Q. Did you speak with the media once or more than once?
- 4 A. More than one time.
- 5 Q. Approximately when was the first time you spoke with the
- 6 media?
- 7 A. In 2002.
- 8 Q. Did there come a time when you were interviewed by law
- 9 enforcement agents about your experiences with Maxwell and
- 10 Epstein?
- 11 A. Yes.
- 12 Q. And approximately when was this?
- 13 A. In 2006 -- or late 2006/early 2007.
- 14 Q. During that interview, did you tell the FBI about your
- 15 experiences with Maxwell and Epstein?
- 16 A. Yes.
- 17 Q. Did you tell the FBI that Maxwell had given you a massage?
- 18 A. Yes.
- 19 Q. Did you tell the FBI that Epstein got into bed with you?
- 20 A. Yes.
- 21 Q. You said earlier that you wanted to reclaim the cowboy
- 22 boots.
- 23 A. Yeah.
- 24 Q. What do you mean by "reclaim"?
- 25 A. I think it was just, you know, obviously something I -- it

LCAVMAX2

A. Farmer - direct

1 was a dark memory, and I felt so taken advantage of by them  
2 both. And I think I was just a little older, and I just saw  
3 them as a symbol of, you know, this hard thing that happened to  
4 me; but that I could -- you know, by using them, it was some --  
5 by using the boots, I mean, it was somehow like changing that,  
6 reclaiming it in some way.

7 Q. In the years after you spoke with FBI in late 2006 or early  
8 2007, have you spoken with the media about your experiences  
9 with Maxwell and Epstein?

10 A. I have.

11 Q. Were you interviewed on television?

12 A. I was.

13 Q. Did you participate in other interviews?

14 A. Yes.

15 Q. Approximately when?

16 A. I believe -- well, I first spoke with another reporter, I  
17 think, in maybe 2016 off the record. And then later on the  
18 record in the summer of 2019. And I think then in the -- yeah,  
19 and then later into the fall.

20 Q. Were you paid for those interviews?

21 A. I was not.

22 Q. Did you struggle with the decision to talk publicly about  
23 your experiences with Maxwell and Epstein?

24 MS. MENNINGER: Objection. Relevance, your Honor.

25 THE COURT: Overruled.

LCAVMAX2

A. Farmer - direct

1 A. Yes.

2 Q. Can you explain.

3 A. Yeah. I think most people probably can understand that  
4 it's not the kind of thing that you would want -- I mean, it  
5 sort of feels like a shameful memory and is not the kind of  
6 thing you want a lot of attention on. But at a certain point,  
7 I felt compelled because I, you know --

8 MS. MENNINGER: Objection. Narrative, your Honor.

9 THE COURT: Overruled.

10 A. I wanted to -- if I could help there be any accountability  
11 or these people being stopped in some way, it felt like it was  
12 worth it, even if it was uncomfortable.

13 Q. Did there come a time when you were interviewed by law  
14 enforcement in New York?

15 A. Yes.

16 Q. Approximately when was that?

17 A. That was in 2019, I believe, in the late summer/early fall.

18 Q. Since that time, have you been interviewed by the  
19 government?

20 A. Yes.

21 Q. Approximately how many times have you met with the  
22 government?

23 A. I'd say approximately five or six times.

24 Q. Did there come a time when you sued Maxwell and Epstein?

25 A. Yes.

LCAVMAX2

A. Farmer - direct

1 Q. Approximately when did you sue them?

2 A. That was, I believe, the fall of 2019.

3 Q. Was that before or after you had met with law enforcement  
4 in New York?

5 A. After.

6 Q. After you filed that lawsuit, did you participate in a  
7 victim compensation fund for victims of Jeffrey Epstein?

8 A. I did.

9 Q. Do you remember what year that fund started accepting  
10 applications?

11 A. I believe that was in early 2020.

12 Q. What did you do as part of that fund?

13 A. I, with my attorneys, there was an application process.  
14 They interviewed me and they put together some materials about,  
15 you know, my story.

16 Q. How much money did the fund award you?

17 A. \$1.5 million.

18 Q. Did that money come from the Estate of Jeffrey Epstein?

19 A. It came, yeah, from the victims' compensation fund.

20 Q. Did your attorneys receive any portion of that award?

21 A. They did not.

22 Q. Why not?

23 A. They agreed to work with me *pro bono*.

24 Q. Has that money been wired to you already?

25 A. Yes.

LCAVMAX2

A. Farmer - direct

1 Q. And just to back up, when you said "*pro bono*," what do you  
2 mean by that?

3 A. I mean they have not received any of that money.

4 Q. As part of the settlement that you received from the fund,  
5 were you required to dismiss your lawsuit against Maxwell and  
6 Epstein?

7 A. I was.

8 Q. To be clear, is your civil case over?

9 A. It is.

10 Q. Are you hoping or expecting to get any more money for what  
11 happened to you with Maxwell and Epstein?

12 A. No.

13 Q. Based on your understanding, will the jury's verdict in  
14 this case affect the award that you received from the fund?

15 A. No.

16 Q. Just to be clear, do you have any financial stake in the  
17 outcome of this trial?

18 A. I do not.

19 MS. POMERANTZ: Your Honor, may I have one moment?

20 THE COURT: You may.

21 (Counsel conferred)

22 MS. POMERANTZ: No further questions.

23 THE COURT: Okay. Ms. Menninger.

24 MS. MENNINGER: Would your Honor like to take the  
25 morning break now or -- I'm happy to start.

LCAVMAX2

A. Farmer - cross

1 THE COURT: I think 15 minutes and then break.

2 MS. MENNINGER: Okay. Sure.

3 CROSS-EXAMINATION

4 BY MS. MENNINGER:

5 Q. Good morning, Ms. Farmer.

6 Sorry. Let me get the microphone.

7 A. Good morning.

8 Q. When you were a junior in high school, you traveled to New  
9 York?

10 A. That's correct.

11 Q. You were 16 years old?

12 A. Yes.

13 Q. Your older sister lived in New York?

14 A. Yes, she did.

15 (Continued on next page)

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A. Farmer - cross

- 1 BY MS. MENNINGER:
- 2 Q. She's about 10 years older than you?
- 3 A. Yeah, nine and a half.
- 4 Q. She was 25 at the time?
- 5 A. I believe that's correct.
- 6 Q. You stayed with her while you were in New York?
- 7 A. I did. I stayed at her apartment.
- 8 Q. She lived there?
- 9 A. Yes.
- 10 Q. Your sister is the one who communicated with you about your
- 11 travel to New York?
- 12 A. Yes, I believe that is correct.
- 13 Q. You flew out by yourself?
- 14 A. I did.
- 15 Q. That was not abnormal for you to travel out by yourself?
- 16 A. Well, I would travel sometimes with my younger sister to
- 17 see my dad or my grandparents, not usually by myself.
- 18 Q. When you spoke with law enforcement in September of 2019,
- 19 you told them that you flew alone, which was not abnormal for
- 20 you; correct?
- 21 A. I don't recall saying that. But, as I mentioned, I did
- 22 have to fly to see my dad because he lived across the country.
- 23 So that's probably what I was referring to. Usually, though,
- 24 my sister would be with me, my little sister.
- 25 Q. But what you said was, you flew alone, which was not

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A. Farmer - cross

1 abnormal for you; correct?

2 MS. POMERANTZ: Objection. Asked and answered.

3 THE COURT: Sustained.

4 Q. If I could show you what's been marked as 3514-006, page 2  
5 in the overflow photograph.

6 MS. MENNINGER: I think we can put that on the screen  
7 for counsel and the Court and the witness. The overflow  
8 paragraph at the top, if we could call that out. My screen  
9 went blank.

10 THE COURT: I hit something.

11 MS. MENNINGER: Happens to all of us.

12 THE COURT: Ms. Williams will make it right.

13 MS. MENNINGER: Okay. Mine is back.

14 THE COURT: She made it better. Go ahead.

15 BY MS. MENNINGER:

16 Q. What you told the government on that occasion is you flew  
17 alone which is not abnormal for you; correct?

18 MS. POMERANTZ: Objection. Asked and answered.

19 THE COURT: You can ask if it refreshes.

20 Q. Does looking at this report refresh your memory that you  
21 told the government, in September much 2019, that you flew  
22 alone which was not abnormal for you?

23 A. I see, yeah, that's what they noted. I'm assuming that was  
24 based on exactly as I've explained, that I would fly to see my  
25 family.

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A. Farmer - cross

- 1 Q. You didn't say anything about your little sister?
- 2 A. I guess not, but at that -- but what would happen.
- 3 Q. It was your understanding that Mr. Epstein purchased your  
4 plane ticket for you to fly to New York?
- 5 A. Yes.
- 6 Q. You understood Mr. Epstein to be Maria's boss; correct?
- 7 A. That's correct.
- 8 Q. You understood that he had been connecting her to people in  
9 the art world; correct?
- 10 A. Yes.
- 11 Q. And she was 25; correct?
- 12 A. That's correct.
- 13 Q. You understood that he was very wealthy?
- 14 A. That's correct.
- 15 Q. You understood or hoped that he might help get you into  
16 college; correct?
- 17 A. And pay for college, yes.
- 18 Q. And you understood and hoped that he might help you pay for  
19 college; correct?
- 20 A. Yes.
- 21 Q. He did not pay for your college?
- 22 A. He did not.
- 23 Q. You were planning to go away for the summer, correct, to an  
24 international trip?
- 25 A. I had hopes. I didn't have any plans at that point.

LCACmax3

A. Farmer - cross

- 1 Q. And you hoped that he might help pay for that trip;  
2 correct?
- 3 A. That's correct.
- 4 Q. Ghislaine Maxwell had no role in the logistics of your  
5 travel to New York; correct?
- 6 A. That's correct.
- 7 Q. She did not fly you there?
- 8 A. No.
- 9 Q. She didn't buy you a ticket to go here?
- 10 A. She did not.
- 11 Q. She didn't arrange for your travel?
- 12 A. No.
- 13 Q. She didn't call your mother before you traveled to New  
14 York?
- 15 A. To New York, no.
- 16 Q. She didn't encourage you to travel to New York?
- 17 A. She did not.
- 18 Q. She did not transport you to New York?
- 19 A. That's correct.
- 20 Q. You had never seen her before you came to New York?
- 21 A. That's correct.
- 22 Q. You had never talked to her before you came to New York?
- 23 A. Yes.
- 24 Q. You didn't even know about her before you came to New York;  
25 correct?

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A. Farmer - cross

1 A. I'm not -- I don't recall whether I heard -- I think I may  
2 have, but I don't remember when I first learned about her.

3 Q. The purpose of your trip was to visit your sister; correct?

4 A. And to meet Epstein, correct.

5 Q. Well, you believed that Mr. Epstein purchased you a ticket  
6 for you to come see Maria in New York; right?

7 A. Yes, that was part of the purpose.

8 Q. You testified that you stayed with your sister at her  
9 apartment in the Village; right?

10 A. Yes.

11 Q. You did not stay at Mr. Epstein's home?

12 A. No, I did not.

13 Q. You went to see several live performances while you were in  
14 town; correct?

15 A. Yes.

16 Q. You went to see those with your sister?

17 A. Yes, at least two of them, yeah.

18 Q. Well, you went to see the Blue Man Group tubes; right?

19 A. Yeah.

20 Q. You went to see The Dutchess, a play; correct?

21 A. Yeah, I think -- Blue Man Group, I don't think Maria was  
22 there for that, but yeah.

23 Q. You went to stay in a ski cabin while you were here;  
24 correct?

25 A. That's correct.

LCACmax3

A. Farmer - cross

- 1 Q. You stayed overnight there?
- 2 A. I think that's correct.
- 3 Q. With your sister?
- 4 A. Yes.
- 5 Q. And with your sister's boyfriend and his brother were at  
6 that cabin; correct?
- 7 A. That's correct.
- 8 Q. You went shopping with your sister; right?
- 9 A. I did.
- 10 Q. You went to flea markets?
- 11 A. Uh-huh.
- 12 Q. Thrift stores?
- 13 A. Yes.
- 14 Q. You went to see some bands with your sister?
- 15 A. Yes.
- 16 Q. You did all of those things on this trip in New York with  
17 your sister; right?
- 18 A. I did.
- 19 Q. She was with you, I think you said without the exception of  
20 perhaps Blue Man Group, she was with you the entire time;  
21 right?
- 22 A. Yes.
- 23 Q. Now, when you arrived in New York, Ghislaine Maxwell didn't  
24 pick you up at the airport?
- 25 A. No.

LCACmax3

A. Farmer - cross

- 1 Q. She didn't drive you anywhere while you were in New York?
- 2 A. No, I didn't see her during that trip.
- 3 Q. She didn't take you to any of these live performances?
- 4 A. No.
- 5 Q. She didn't take you to see The Lion King, for example?
- 6 A. No.
- 7 Q. She didn't take you shopping or to a ski cabin; right?
- 8 A. No.
- 9 Q. She didn't take you to the movies?
- 10 A. No.
- 11 Q. She didn't engage you in any conversation about your
- 12 interests; right?
- 13 A. No.
- 14 Q. She didn't offer to pay for your college or a trip in the
- 15 summer; right?
- 16 A. She did not.
- 17 Q. Didn't invite you to her home?
- 18 A. No.
- 19 Q. Didn't give you champaign?
- 20 A. No.
- 21 Q. She didn't buy you any clothing while you were in New York?
- 22 A. No.
- 23 Q. No preppy clothes or underwear; right?
- 24 A. No.
- 25 Q. She simply was not here the entire time you were in New

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A. Farmer - cross

1 York; right?

2 A. That's correct.

3 Q. When you went to Epstein's house, you were there the whole  
4 time with your sister; correct?

5 A. Yes.

6 Q. And it was there that Mr. Epstein spoke with you about  
7 college applications?

8 A. Yes.

9 Q. And discussed the college application process; right?

10 A. That's right.

11 Q. He urged you to consider UCLA, I think it was?

12 A. Yes.

13 Q. He talked to you about traveling abroad for the summer?

14 A. Yes.

15 Q. And how that might help your college applications?

16 A. Yes.

17 Q. You did ultimately go to an ivy league school; right?

18 A. Yes.

19 Q. And he surprised you with tickets to the Phantom of the  
20 Opera; right?

21 A. Yes.

22 Q. You said you were really excited about seeing the Phantom  
23 of the Opera; right?

24 A. I was.

25 Q. It wasn't the first time you had seen it?



LCACmax3

A. Farmer - cross

- 1 A. No.
- 2 Q. You had seen it before?
- 3 A. Yeah, a friend invited me in Phoenix.
- 4 Q. And it was better this time in New York?
- 5 A. Yes.
- 6 Q. And, again, Ghislaine Maxwell wasn't a part of this  
7 conversation at Epstein's home; right?
- 8 A. She was not.
- 9 Q. He didn't even mention her during this trip to his home;  
10 correct?
- 11 A. That, I don't remember.
- 12 Q. Well, you've spoken to the government a number of times;  
13 correct?
- 14 A. Yes.
- 15 Q. You filed a civil lawsuit against Ms. Maxwell; right?
- 16 A. Yes.
- 17 Q. You submitted a claim to the Victims Compensation Fund;  
18 right?
- 19 A. Yes.
- 20 Q. And on none of those occasions have you said that  
21 Mr. Epstein's conversation with you at his home involved  
22 Ghislaine Maxwell; right?
- 23 A. It did not center on her. I don't remember if she was  
24 mentioned. I was trying to be accurate, yeah.
- 25 Q. And if you didn't remember it, you didn't tell someone

LCACmax3

A. Farmer - cross

1 about it; right?

2 A. I did not, right.

3 Q. You said, I believe, that you had visited with Mr. Epstein  
4 in the office of his home; correct?

5 A. I remember there being a desk there. That's why I was  
6 assuming it was an office, but --

7 MS. MENNINGER: Just one moment.

8 THE COURT: Okay.

9 Q. You were sitting at a desk; right?

10 A. Yes.

11 Q. You don't know whether his home was under renovation at the  
12 time you were there; correct?

13 A. I believe it was.

14 Q. And you believe this was at the beginning of 1996; correct?

15 A. As I said, late 1995, early 1996.

16 Q. Well, your journal entry is dated January 7th; right?

17 A. Right.

18 Q. And you had just gotten back that day; right?

19 A. I don't know if it says that day. I know I recently  
20 returned.

21 Q. And you thought you were there about a week; right?

22 A. I know I left after Christmas. So in that time.

23 MS. MENNINGER: If we could --

24 THE COURT: We're at about a quarter after,

25 Ms. Menninger. Should we break here?

LCACmax3

A. Farmer - cross

1 MS. MENNINGER: Sure.

2 THE COURT: Ladies and gentlemen, we'll take our  
3 morning break. See you in about 15 minutes.

4 (Continued on next page)

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LCACmax3

A. Farmer - cross

1 (Jury not present)

2 THE COURT: The witness can step down while we break.

3 (Witness not present)

4 Counsel, are there matters to take up before we break?

5 MS. POMERANTZ: Not from the government, your Honor.

6 MS. MENNINGER: Not from me, your Honor.

7 THE COURT: See you in about ten minutes. Let me know  
8 if there is anything you need. Thank you.

9 (Recess)

10 Matters to take up?

11 MS. MENNINGER: No, your Honor.

12 MS. POMERANTZ: Not from the government. Thank you,  
13 your Honor.

14 THE COURT: We'll bring back the witness and bring in  
15 the jury.

16 (Witness present)

17 You can take your seat, Ms. Farmer. Thank you. You  
18 may remove your mask.

19 (Continued on next page)

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LCACmax3

A. Farmer - cross

1 (Jury present)

2 Thank you so much, members of the jury.

3 Ms. Menninger, you may continue with your cross  
4 examination.

5 MS. MENNINGER: Thank you, your Honor.

6 BY MS. MENNINGER:

7 Q. I think when we left off, I was asking you about the dates  
8 of your trip.

9 MS. MENNINGER: If I could pull up Government Exhibit  
10 603. As this is in evidence, your Honor, if I could also  
11 publish it to the jury.

12 THE COURT: You may.

13 Q. So this is your journal; right?

14 A. It is, yes. I see what you're referring to.

15 Q. In your journal, you gave a date of January 7th, 1996;  
16 correct?

17 A. Yes.

18 Q. And what you wrote is, I got back from my trip to New York  
19 today?

20 A. Yes, I was right on top of that journal entry, yes.

21 Q. So it's now your memory that you got back on January 7th;  
22 right?

23 A. Correct.

24 Q. And you had been there for about a week; correct?

25 A. Yes.

LCACmax3

A. Farmer - cross

1 Q. And you had been there for a New Year's eve party, I think  
2 you said?

3 A. Yes. So it may be that the trip was a little longer than a  
4 week, because I'm seeing that date, yeah.

5 Q. You know it was after Christmas of '95; right?

6 A. Yeah.

7 MS. MENNINGER: We can take that down now, thank you.

8 Q. Back in your time at Mr. Epstein's home, you believe it was  
9 under renovation while you were there; correct?

10 A. It may have been. I don't know. I have heard, but I don't  
11 remember from that time. I don't have a memory of it being  
12 under renovation, but I have heard that that's possible.

13 Q. And I won't ask you where you heard that. I'm not asking  
14 you where you heard that.

15 A. Okay.

16 Q. You do know that there was no sexual activity that occurred  
17 while you were in Mr. Epstein's home; correct?

18 A. That's correct.

19 Q. No one physically touched you there?

20 MS. POMERANTZ: Objection, your Honor. Just to  
21 clarify which home we're talking about.

22 MS. MENNINGER: The New York home. Sorry. I thought  
23 that was the general topic here.

24 Q. I'm talking about your time in the New York home that was  
25 possibly under renovation in early of 1996; right?

LCACmax3

A. Farmer - cross

- 1 A. Sorry. What was the question about that?
- 2 Q. I'm just orienting you to make sure you and I are talking  
3 about the same thing.
- 4 A. Yes.
- 5 Q. And I understand us to be talking about a time in early  
6 January 1996 when you were in Mr. Epstein's --
- 7 A. We're on the same page, yes.
- 8 Q. -- New York home; right?
- 9 A. Yes.
- 10 Q. No physical contact happened with you in that home?
- 11 A. That's correct.
- 12 Q. No one showed you any vibrators or massagers or anything  
13 like that in that home?
- 14 A. No.
- 15 Q. And regardless, Ghislaine Maxwell was not present in  
16 Mr. Epstein's home while you were there; right?
- 17 A. Correct.
- 18 Q. You just talked about later going to the movie theater with  
19 Epstein and your sister during the same trip in New York in  
20 early 1996?
- 21 A. Yes.
- 22 Q. And Ghislaine Maxwell was not at the movie theater; right?
- 23 A. That's right.
- 24 Q. And you talked about how he held your hand and rubbed your  
25 arm during that time in the movie theater; right?

LCACmax3

A. Farmer - cross

1 A. That's right.

2 Q. You told this to the FBI when you first met with them in  
3 relation to this case, in September of 2019; correct?

4 A. Yes.

5 Q. And before you met with the FBI in September of 2019 and  
6 talked about the movie theater incident, you actually refreshed  
7 your memory by looking at your journal; right?

8 A. I had seen my journal, yes.

9 Q. And you told them that you knew about this experience in  
10 the movie theater because you had looked at your journal and  
11 refreshed your memory; correct?

12 A. I knew about the experience apart from that, but I had  
13 looked in my journal, yes.

14 Q. What you told the prosecutors and the FBI in 2019, after  
15 telling them about the movie theater incident, is that you  
16 recalled your memory was refreshed of the incident by looking  
17 at your journal; right?

18 A. Yes.

19 Q. You had looked at the journal before you had the meeting  
20 with them in September of 2019?

21 A. Yes.

22 Q. And you also refreshed your memory about the age you were  
23 when you took the trip by looking at your journal in 2019?

24 A. The age when I took the trip to New Mexico --

25 Q. New York. New York. I'm sorry. I'm just talking about



LCACmax3

A. Farmer - cross

1 New York. I apologize if it wasn't clear.

2 A. Okay.

3 Q. You refreshed your memory about the age you were when you  
4 took the trip to New York by looking at your journal?

5 A. I don't remember saying that, but that's possible, yes. I  
6 mean, I knew it was in my junior year, so I don't think it  
7 would have been that hard for me to determine my age, but --

8 MS. MENNINGER: If I could have the witness and  
9 counsel look at 3514-006, page 1, third full paragraph about  
10 five lines down.

11 Q. If you could just read that bottom half of that paragraph  
12 to yourself and tell me if that refreshes your memory about  
13 what you told the government in 2019.

14 MS. POMERANTZ: Objection, your Honor.

15 THE COURT: She can look at it.

16 A. I'm sorry. Just read it but to myself, is that what you  
17 said?

18 Q. Yes. And do you now recall that, in September of 2019, you  
19 had looked at your journal and refreshed your memory about the  
20 age you were when you took the trip before you met with the  
21 government then?

22 A. I think it -- the sentence is a summary. I don't know if  
23 that's what it -- that's not my interpretation of it. I see  
24 that they wrote a note about that. I think I knew I was 16,  
25 but I do know that I refreshed my memory about the experience

LCACmax3

A. Farmer - cross

1 by reading the journal.

2 MS. MENNINGER: Okay, clear. So we can take that  
3 down.

4 Q. So we know that you refreshed your memory with the journal  
5 before you met with the government in September of 2019?

6 A. Yes.

7 Q. And we do that sometimes in this courtroom, too. I ask you  
8 to take a look at a document to refresh your memory because it  
9 helps people remember things that they wrote down a long time  
10 ago?

11 A. Of course.

12 Q. And that's kind of what you had done before you met with  
13 the government in September of 2019; right?

14 A. I had had that journal with me, and so I had looked at it  
15 over the years, yes.

16 Q. And it helped you remember things from a long time ago?

17 A. Yes.

18 Q. Because you had written it down at the time; right?

19 A. Yeah.

20 Q. The government introduced some pages from that journal - I  
21 think it was 603 and 604, if memory serves - and they asked you  
22 a little bit about the journal on direct. I want to ask you a  
23 few more questions about the journal.

24 A. Oh, sure.

25 Q. The cover of the journal -

LCACmax3

A. Farmer - cross

1 MS. MENNINGER: Is that 603? Sorry. 601. If we  
2 could show that to counsel and the witness.

3 Q. This is the cover of one of your journals from high school;  
4 correct?

5 A. Yes.

6 Q. It's the one that contains the pages that we've been  
7 looking at; right?

8 A. Yes.

9 Q. Now, you had several journals during high school; right?

10 A. Yes, I did have other journals in high school.

11 Q. You kept a journal throughout high school?

12 A. I know, like, I journaled when I went to Thailand in a  
13 separate journal on that trip. And I've had journals starting  
14 in elementary school, off and on, but again, I'm not very  
15 consistent, so I don't know that I journaled throughout high  
16 school. I think there were chunks of time that I would do it  
17 and then I would put it aside for a while.

18 Q. And when you spoke to the government in September of 2019,  
19 you said throughout high school, you maintained a journal;  
20 right?

21 A. Yeah. I'm trying to elaborate on that, yeah.

22 Q. So you had this journal from around the time you went to  
23 New York?

24 A. Right.

25 Q. And then you had another journal from the time you went to

LCACmax3

A. Farmer - cross

1 Thailand in the summer?

2 A. Yeah. That was only about that trip. Yes.

3 Q. And then you had other journals thereafter; right?

4 A. I don't recall if I journaled again in my senior year, but  
5 I know I journaled again in college and other times.

6 Q. And this particular journal that we've been looking at and  
7 the government had you read from, you actually read from it  
8 during some of your media appearances; right?

9 A. I did.

10 Q. On a documentary or a 2020 special or something; right?

11 A. I did.

12 MS. MENNINGER: And if I could ask to turn to page 2  
13 of 603, I believe it is. I'm sorry. It's not.

14 Let me back up. I would like to introduce Defendant's  
15 Exhibit AF1, which I think there was a page omitted from the  
16 government's exhibit. If I could confer with counsel.

17 THE COURT: You want to indicate the identification  
18 mark and then pull it up for me, please.

19 MS. MENNINGER: Yes, your Honor. And I apologize,  
20 your Honor, if I may approach, I do have a paper binder I could  
21 give to the Court and the witness because it's multiple pages.  
22 There is just a different page than the government's exhibit.

23 THE COURT: Okay. When you get back, the tab number  
24 and then, again, just the mark for identification.

25 MS. MENNINGER: AF1, your Honor.

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A. Farmer - cross

1 THE COURT: And that's behind tab 1?

2 MS. MENNINGER: I think we have the 3500 material  
3 first, your Honor. So it's about halfway through the binder is  
4 when the AF exhibits start.

5 THE COURT: I see. Thank you.

6 MS. MENNINGER: Your Honor, I've marked for  
7 identification AF1. What I would like to do is to draw the  
8 witness's attention --

9 THE COURT: You want to direct the witness to a page?

10 MS. MENNINGER: Page 2, exactly, of that entry.

11 THE COURT: Of AF1?

12 MS. MENNINGER: Yes.

13 BY MS. MENNINGER:

14 Q. Do you see that entry?

15 A. Yes.

16 Q. Do you recognize this was another entry in the same  
17 journal?

18 A. Yes.

19 MS. MENNINGER: And I don't believe it was in the  
20 government's exhibit, and that's why I'm asking to introduce  
21 this page, and I can work out with the government later if  
22 there is any redactions. I don't think any are appropriate,  
23 but --

24 MS. POMERANTZ: No objection, your Honor.

25 THE COURT: AF1 is admitted temporarily under seal so

LCACmax3

A. Farmer - cross

1 the government can propose any redactions.

2 (Defendant's Exhibit AF1 received in evidence)

3 BY MS. MENNINGER:

4 Q. Thank you. This page 2 is actually is an entry that you  
5 made before you went to New York; right?

6 A. Right.

7 Q. And it doesn't have a date on it?

8 A. Right.

9 Q. But you're describing your excitement at going to see your  
10 sister in New York; right?

11 A. Yeah.

12 Q. And you're describing your excitement about meeting  
13 Epstein; correct?

14 A. Right. Maria, I'm excited about getting this ticket that  
15 he bought me, yeah.

16 Q. And you refer to him --

17 MS. MENNINGER: Could we publish to the jury that  
18 page. Is that a problem?

19 MS. POMERANTZ: No, not at all.

20 MS. MENNINGER: If we could publish to the jury that  
21 page, your Honor?

22 THE COURT: Do you have it on paper?

23 MS. MENNINGER: I don't think that the government  
24 thinks that there is any proposed redactions to this page.

25 THE COURT: Let's just give them a minute.

LCACmax3

A. Farmer - cross

1 MS. MENNINGER: Of course.

2 THE COURT: And if not, we can unseal it.

3 MS. POMERANTZ: Your Honor, as long as we're referring  
4 to just page 2, then the government does not believe any  
5 redactions are necessary. So it can be published.

6 THE COURT: Why don't we do that. Why don't we make  
7 page 2 AF1.

8 MS. MENNINGER: That's fine.

9 THE COURT: Page 2 of what I'm looking at will be now  
10 marked as AF1 and, without objection, I'll admit AF1, which is  
11 only page 2.

12 Let me just give the Bates that's at the bottom. You  
13 want to just give that --

14 MS. MENNINGER: Yes, your Honor. It's Bates labeled  
15 AFarmer10472.

16 THE COURT: That is the single page that I'm admitting  
17 as AF1. And no objection to it being published?

18 MS. POMERANTZ: No objection, your Honor.

19 THE COURT: You may publish.

20 MS. MENNINGER: Thank you, your Honor.

21 BY MS. MENNINGER:

22 Q. So this is, I think as we just said, an entry that you made  
23 in the same journal before you went to New York?

24 A. Correct.

25 Q. So it's your handwriting, et cetera?

LCACmax3

A. Farmer - cross

1 A. Correct.

2 Q. You referred to Epstein as Maria's boss; right?

3 A. Yes.

4 Q. You didn't use his name at that point in time?

5 A. Right.

6 Q. And you described that you were hoping that he might help  
7 pay for your college; right?

8 A. Yes.

9 Q. And you were hoping that he might help you get into  
10 college; right?

11 A. Yes.

12 Q. And you didn't want to get your hopes up because you might  
13 be disappointed?

14 A. Yes.

15 Q. And that's sort of what you had written down before you  
16 went to New York?

17 A. Yes.

18 Q. Nothing in there about Ghislaine Maxwell?

19 A. Correct.

20 MS. MENNINGER: And now we'll use the Government  
21 Exhibit 603, which picks up, I believe, on the next entry that  
22 we have.

23 THE COURT: And that's a public exhibit?

24 MS. MENNINGER: Right.

25 MS. POMERANTZ: That's correct, your Honor.



LCACmax3

A. Farmer - cross

1 BY MS. MENNINGER:

2 Q. And I think we looked at this just a moment ago?

3 A. Yes.

4 Q. And you can look at it on your screen now.

5 A. It's a little easier to read.

6 Q. You can put that down. Thank you.

7 And as we discussed, this is the first entry that you  
8 made when you got back from New York; right?

9 A. Right.

10 Q. And this is the entry in which you talked about going to  
11 Phantom of the Opera?

12 A. Yes.

13 Q. And going to Mr. Epstein's home; right?

14 A. Yes.

15 Q. You called the Phantom of the Opera the best night of your  
16 trip; correct?

17 A. Yes.

18 Q. You talked about meeting Maria's boyfriend and so forth in  
19 this same entry; correct?

20 A. Yes.

21 Q. You talked about going cross country skiing at some point  
22 during the trip?

23 A. Yes.

24 MS. MENNINGER: On the next page, if we could.

25 MS. POMERANTZ: Your Honor, can we take this down for

LCACmax3

A. Farmer - cross

1 just a moment, please.

2 If I can just have a moment to confer with defense  
3 counsel?

4 THE COURT: Yes.

5 (Pause)

6 MS. MENNINGER: Your Honor, there is a bit of a  
7 disagreement about the redactions, but I don't want to hold up  
8 the presentation for the jury. So we can take that up later.

9 THE COURT: Sure.

10 MS. MENNINGER: But I do want to ask the witness a  
11 couple of questions. So if I could direct her attention to  
12 what we have marked as AF1, and it's going to be page 4 of that  
13 exhibit.

14 THE COURT: We have a terminological issue, because  
15 that was originally AF1, but we just admitted the one page as  
16 AF1.

17 How about this, we'll go back, I'll admit under seal,  
18 again, temporarily, AF1 as a seven-page document.

19 MS. MENNINGER: Thank you.

20 THE COURT: Recognizing there is overlap between some  
21 of the pages of the AF1 and Government Exhibit 603.

22 MS. MENNINGER: Thank you, your Honor. We can work  
23 that out.

24 THE COURT: Ms. Pomerantz.

25 MS. POMERANTZ: That's fine, your Honor.

LCACmax3

A. Farmer - cross

1 THE COURT: Let me just talk to the record for a  
2 moment.

3 I retract that I'm only admitting the single page of  
4 AF1 as AF1. Instead, I am temporarily admitting under seal a  
5 seven-page document marked as AF1. Counsel will work out  
6 limited redactions. We'll turn that into a public document  
7 with limited redactions.

8 Go ahead.

9 MS. MENNINGER: Thank you, your Honor.

10 BY MS. MENNINGER:

11 Q. So I just wanted to ask you, in this journal entry, you  
12 wrote about going to a ski cabin and going cross country  
13 skiing; right?

14 A. Yeah. I'm sorry. I think I got lost. Are we back in the  
15 binder now?

16 Q. You can testify from memory right now. If you need to look  
17 at it, we can show it to you again.

18 A. Okay.

19 Q. But you, I believe, would recall that you wrote about going  
20 to a cross country skiing cabin?

21 A. Yes.

22 Q. And you also wrote about going to see a movie or watching a  
23 movie while you were in that cabin, and the name of the movie  
24 was Sleuth?

25 A. Okay. Yes.

LCACmax3

A. Farmer - cross

1 Q. And you talked about going to see bands and going to a bar  
2 and other things that you did during your trip?

3 A. Okay. Yes.

4 Q. Is that right?

5 A. Yes.

6 Q. You recall that's in your journal entry?

7 A. Yes.

8 Q. You've reviewed that journal entry a few times; right?

9 A. Yes.

10 Q. And significantly, in this journal entry, you really talked  
11 about your emotions that you were feeling after you returned  
12 from your trip to New York; right?

13 A. Yes.

14 Q. You talked about how you had such a great time, it was  
15 really depressing to be home; right?

16 A. I did.

17 Q. The trip changed your whole outlook on life; right?

18 A. Yeah.

19 Q. You say you always feel that way when I get back from  
20 trips; right?

21 A. Yes.

22 Q. You had been on other trips?

23 A. Correct.

24 Q. I think you mentioned that you felt similarly when you got  
25 back from Mexico?

LCACmax3

A. Farmer - cross

- 1 A. Correct.
- 2 Q. You've been to Mexico?
- 3 A. Yes.
- 4 Q. It was really overwhelming this time because you felt more  
5 independent and things along those lines; right?
- 6 A. That's right.
- 7 Q. You also talked about how you felt really comfortable here  
8 in New York?
- 9 A. Yes.
- 10 Q. And you felt like you belonged here?
- 11 A. Yes.
- 12 Q. You hoped to live here some day?
- 13 A. Yes.
- 14 Q. And this was after your entire trip was over; right?
- 15 A. That's right.
- 16 Q. You wrote this after you got back home; right?
- 17 A. That's right.
- 18 Q. After the movie theater incident?
- 19 A. That's right.
- 20 Q. You also had your impressions of Epstein recorded in this  
21 journal entry; right?
- 22 A. That's correct.
- 23 Q. You found him down to earth and easy to talk to; right?
- 24 A. Yes.
- 25 Q. In this journal entry, after you got back from New York,

LCACmax3

A. Farmer - cross

1 again, there is no mention of Ghislaine Maxwell; correct?

2 A. That's right.

3 Q. And this, what we've been looking at, is only a portion of  
4 your January 7th journal entry; right?

5 A. Right.

6 Q. But you have no reason to believe Ghislaine Maxwell is  
7 mentioned in the rest of the entry that we don't have?

8 A. No.

9 Q. I want to talk about the next journal entry, which I  
10 believe is Government Exhibit 604.

11 MS. MENNINGER: And we may have the same issue, but  
12 I'll try to be sensitive to it, your Honor.

13 THE COURT: Okay. Thank you.

14 Q. This one is dated January 25th of 1996; right?

15 A. Right.

16 Q. And that's about three weeks after the last one; right?

17 A. Yeah.

18 Q. And were there any entries between January 6th and January  
19 25th?

20 A. I don't believe so.

21 Q. And when you wrote this entry a few weeks later, you wanted  
22 to go back and fill in some details that you hadn't mentioned  
23 the first time; right?

24 A. Right.

25 Q. And that's when you wrote about go going to see a play

LCACmax3

A. Farmer - cross

1 called the Dutchess?

2 A. Yes.

3 Q. The Blue Man Group and the flea market and that kind of  
4 thing?

5 A. Yes.

6 Q. You went to the Met; right?

7 A. Yes.

8 Q. And a pretty fun New Year's Eve party and the thrift  
9 stores?

10 A. Yes.

11 Q. And it was after your discussion about all of those things  
12 that you wrote about your experience in the movie theater;  
13 right?

14 A. Yes.

15 Q. During your entire trip in New York, you didn't write about  
16 Ghislaine Maxwell in your journal; right?

17 A. Right.

18 Q. And you would agree with me that having been able to  
19 refresh your memory with these journal entries has brought back  
20 some of the details that you may not have remembered if you  
21 didn't have a journal entry; right?

22 A. Yes.

23 Q. You may not have remembered the Dutchess or --

24 A. Right.

25 Q. What your emotions were; right?

LCACmax3

A. Farmer - cross

1 A. Right.

2 Q. But having written them down in this journal, it's easy for  
3 you to now recall them?

4 A. Yeah, it helps with the frame of mind -- remind myself --  
5 of the frame of mind.

6 Q. In your journal entry related to the movie theater  
7 incident - and I think you talked about this on direct - you  
8 made a number of statements like, it wasn't weird, it wasn't  
9 that weird, probably normal, it's a little back and forth; is  
10 that fair?

11 A. Oh, yeah.

12 Q. You even said to yourself, it sounds like I'm justifying  
13 it, but I'm not justifying it; right?

14 A. Yes.

15 (Continued on next page)

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LCAVMAX4

A. Farmer - cross

1 BY MS. MENNINGER:

2 Q. And as you sit here today, you now find Epstein's behavior  
3 in that movie theater weird?

4 A. I think I found it weird then too, which is why I used that  
5 word so many times. But I do now, yes.

6 Q. You said it was not weird, it was normal and fine, in your  
7 journal entry, right?

8 A. Yeah. I also said it weirded me out.

9 Q. And then you said, It's not a big deal. Right?

10 A. I did say that.

11 Q. And "I really don't think it is a big deal." Right?

12 A. Correct.

13 Q. So you used both versions: It's weird, it's not weird.  
14 Right?

15 A. Yes.

16 Q. As you sit here today, you find it weird, right?

17 A. I still find it weird.

18 Q. And at points in this journal entry, you did not find it  
19 weird, but at other points you did, right?

20 A. That's what I wrote.

21 Q. And that's based on your today looking back on it in  
22 hindsight; correct? You're looking back on your emotions on  
23 January 25th, 1996; correct?

24 A. I am reflecting on that.

25 Q. You have your memories today, and you have the emotions you

LCAVMAX4

A. Farmer - cross

1 wrote down in January of 1996, right?

2 A. Correct.

3 Q. And your memories today are colored by hindsight; correct?

4 A. Of course.

5 Q. And you are colored in your memories of hindsight by what  
6 happened to you in New Mexico, for example?

7 MS. POMERANTZ: Objection, your Honor.

8 THE COURT: Overruled.

9 Q. Right?

10 A. Does that affect how I perceive what happened to me in New  
11 York?

12 Q. Yes.

13 A. Yes, I'm sure it does in some ways.

14 Q. Right. Because what may not have seemed weird in one  
15 moment, if it happened again with him, may become weirder,  
16 right?

17 A. Yes.

18 Q. In your journal entry, after describing the movie theater  
19 incident, you continue on to talk about mundane teen  
20 activities, right?

21 A. Right.

22 Q. And we don't need to talk about your friends' names, but  
23 you started talking about, excuse me, who you were friends with  
24 or --

25 A. Very high school stuff, yes.

LCAVMAX4

A. Farmer - cross

1 Q. Okay. And you even said you were in a pretty happy place  
2 at the time you wrote this entry; correct?

3 A. I did say that.

4 Q. And you were excited for the future, right?

5 A. Yes.

6 Q. And for the avoidance of all doubt, there is no entry in  
7 any of your journals that relate to Ghislaine Maxwell?

8 A. That's correct.

9 Q. And that is true with respect to a journal you wrote in  
10 Thailand after you claimed the New Mexico event happened;  
11 correct?

12 A. That's correct.

13 Q. And that's true if you had other journals from your senior  
14 year; no mention of Ghislaine Maxwell, right?

15 A. Correct.

16 Q. 604 that we looked at with the government is the last  
17 journal entry that you gave to the government for this case;  
18 correct?

19 A. Sorry. Should I pull up the binder?

20 MS. MENNINGER: Actually, if Ms. Drescher could pull  
21 up 604. I just don't have that version in our computer.

22 THE COURT: Okay. It is admitted, so you may publish,  
23 please, Ms. Drescher. Thank you.

24 MS. MENNINGER: If we could go to the next page.

25 Thank you, Ms. Drescher. And then is the back cover admitted?

LCAVMAX4

A. Farmer - cross

1           Sorry, your Honor.

2 BY MS. MENNINGER:

3 Q. Is this page that you see here in front of you from 604 the  
4 last page of your journal that you gave to the government in  
5 connection with this case?

6 A. I don't recall, but if it's entered that way, then yes, I'm  
7 assuming it is.

8 Q. Okay.

9           MS. MENNINGER: We could pull up AF-1, page 7, just  
10 for counsel and the witness.

11           THE COURT: That's fine.

12           MS. MENNINGER: I believe it's noncontroversial. And  
13 the government has a copy of it now.

14           MS. POMERANTZ: Yes, your Honor, we have a copy.

15 Q. So this is the back of the journal, right?

16 A. Correct.

17 Q. And you gave a copy of this picture of the back of this  
18 journal to the government?

19 A. Right.

20 Q. And so that's what we have.

21 A. Oh, yeah. Okay.

22 Q. We've covered everything that you gave to the government in  
23 relationship to this journal?

24 A. Okay. Yes.

25 Q. Correct?

LCAVMAX4

A. Farmer - cross

- 1 A. Correct.
- 2 Q. So we have photocopied pages from within the journal?
- 3 A. Yes.
- 4 Q. We have a picture of the front of the journal, right?
- 5 A. Yes.
- 6 Q. And a picture of the back of the journal?
- 7 A. Yes.
- 8 Q. Just to be clear, the government has never received a
- 9 physical copy of the journal; correct?
- 10 A. Correct.
- 11 Q. You have never given that to them?
- 12 A. Correct.
- 13 Q. So since you -- these are all the pages we have; you do not
- 14 have a journal entry that reflects your trip to New Mexico?
- 15 A. That's correct.
- 16 Q. We don't have "I'm excited about going to New Mexico,"
- 17 right?
- 18 A. Correct.
- 19 Q. We don't have "I'm excited to go to New Mexico to see
- 20 Maria's boss" or something like that?
- 21 A. Right.
- 22 Q. We don't have how we felt when you got home from New
- 23 Mexico?
- 24 A. There's no journal entries about New Mexico.
- 25 Q. And where is the physical journal right now?

LCAVMAX4

A. Farmer - cross

- 1 A. It's in the City of New York.
- 2 Q. Without a journal entry from the New Mexico trip, we can't  
3 confirm with a piece of paper who invited you there, right?
- 4 A. With a piece of paper? No.
- 5 Q. Or why you were going, right?
- 6 A. Yes, there's no journal and record of any of that.
- 7 Q. There's no piece of paper that you know of, right?
- 8 A. Correct.
- 9 Q. Journal or otherwise, right?
- 10 A. Correct.
- 11 Q. We don't have a document that tells us when you went,  
12 right?
- 13 A. Correct.
- 14 Q. And because we don't have an entry from after the trip to  
15 New Mexico, we can't tell with a piece of paper what happened  
16 to you while you were there; correct?
- 17 A. Correct.
- 18 Q. Or who was there, right?
- 19 A. Correct.
- 20 Q. Or what you talked about while you were there?
- 21 A. That's right.
- 22 Q. How you felt about the trip?
- 23 A. Right.
- 24 Q. Right?
- 25 And because we don't have a piece of paper or a

LCAVMAX4

A. Farmer - cross

1 journal entry, it is harder for you to remember the events in  
2 the New Mexico trip versus the New York trip?

3 MS. POMERANTZ: Objection, your Honor.

4 THE COURT: Overruled.

5 A. Yes.

6 Q. You've told the government it was harder for you to  
7 disaggregate discussions about those two trips?

8 A. I'm sorry, to disaggregate discussions with who?

9 Q. You had discussions about going to New York with certain  
10 people, your sister, I think you said?

11 A. Right.

12 Q. You had discussions about going to New Mexico with people,  
13 I think you said, before you went?

14 A. Before I went.

15 Q. Yes.

16 A. Yes.

17 Q. You said you spoke with Mr. Epstein on the phone; correct?

18 A. About going to Thailand. I don't remember about going to  
19 New Mexico.

20 Q. You spoke to him between the time you went to New York and  
21 the time you went to New Mexico.

22 A. Correct.

23 Q. You spoke with him on the phone?

24 A. Yes.

25 Q. You did not ever speak with Ghislaine Maxwell on the phone?

LCAVMAX4

A. Farmer - cross

1 A. I did not.

2 Q. And you spoke to your mother about going to New Mexico?

3 A. That's correct.

4 Q. And when you were talking to the government about all these  
5 various conversations, you told them it was harder for you to  
6 disaggregate the discussions about those two different trips,  
7 right?

8 A. I don't recall saying that, but I -- I understand what  
9 you're saying.

10 Q. Okay. And you have very little memory of how the New  
11 Mexico trip was planned; correct?

12 A. That's correct.

13 Q. And you have very little memory because you have no journal  
14 entries from that time period, right?

15 MS. POMERANTZ: Objection.

16 THE COURT: Overruled.

17 A. I have not had a journal to help me refresh my memories of  
18 how that was planned.

19 Q. Thank you.

20 Now, you testified on direct that you believe you went  
21 in the -- to New Mexico in the spring of '96, right?

22 A. That's correct.

23 Q. And you also said you believe it was April of '96?

24 A. That's right.

25 Q. And you're going off of your memory for that?



LCAVMAX4

A. Farmer - cross

1 A. Yes.

2 Q. Because we don't have a journal entry, right?

3 A. That's correct.

4 Q. And actually it's a bit of a reconstructed memory, right?

5 A. About the timeline?

6 Q. Of when you went to New Mexico.

7 A. Certain things stand out that help me to remember what the  
8 timeline would have been, yes.

9 Q. Okay. You remember certain things about the trip, like  
10 going to see *Primal Fear*, right?

11 A. Yes.

12 Q. And what you did is you got on the internet and researched  
13 when *Primal Fear* was released, right?

14 A. I remember going to see *Primal Fear*. And I did at some  
15 point check to make sure that that was -- when that came out.  
16 And that confirmed that, yes, that was the correct time that I  
17 had remembered.

18 Q. You confirmed the time *Primal Fear* was released and then  
19 placed your memory of the trip relative to that date; correct?

20 A. I don't think I would say it that way.

21 Q. Okay.

22 MS. MENNINGER: I'd like to show the witness what  
23 we've marked for identification as AF-8.

24 THE COURT: Okay.

25 MS. POMERANTZ: Your Honor, this is the first time

LCAVMAX4

A. Farmer - cross

1 we're seeing this, so I'd ask for just a moment to review.

2 THE COURT: You may.

3 MS. POMERANTZ: Thank you, your Honor.

4 THE COURT: Go ahead.

5 MS. MENNINGER: May I show AF-8 to the witness, your  
6 Honor?

7 THE COURT: You may.

8 MS. MENNINGER: Can you please put it on counsel's  
9 screen.

10 BY MS. MENNINGER:

11 Q. Ms. Farmer, you recall having email communications with a  
12 journalist?

13 A. Yes.

14 Q. And that journalist's name is Mike Baker?

15 A. Correct.

16 Q. He works for *The New York Times*?

17 A. That's correct.

18 Q. You gave an interview with Mr. Baker relative to your  
19 experiences; correct?

20 A. I did.

21 Q. And before you did that, Mr. Baker had some emails where he  
22 was confirming certain dates with you?

23 A. That's right.

24 Q. And one of the communications Mr. Baker asked about is the  
25 timing of your trip to New Mexico?

LCAVMAX4

A. Farmer - cross

- 1 A. That's right.
- 2 Q. And he cited your recollection that it was in the spring?
- 3 A. Sorry. I just read the first part. I'm looking at the
- 4 bottom.
- 5 Q. If you look at the bottom full paragraph --
- 6 A. Oh, yeah.
- 7 Q. -- does that refresh your memory --
- 8 A. Yeah.
- 9 Q. -- he's asking you?
- 10 A. Yes.
- 11 Q. And he said he understood it was in the spring, maybe
- 12 April, right?
- 13 A. Yes.
- 14 Q. And you wrote him back and told him that you had looked up
- 15 the release date of *Primal Fear*?
- 16 A. Yes.
- 17 Q. Right?
- 18 And you told him it wasn't out until April 3rd, right?
- 19 A. Right.
- 20 Q. And you told him that you also had talked to some of your
- 21 friends, right?
- 22 A. Yes.
- 23 Q. About when prom was?
- 24 A. Yeah.
- 25 Q. And that was in late April, right?

LCAVMAX4

A. Farmer - cross

1 A. That's correct.

2 Q. And so after looking up *Primal Fear* and talking to your  
3 friends, you told him you're feeling pretty confident that it  
4 was April?

5 A. Yes.

6 Q. So you took some memory fragments that you had, *Primal Fear*  
7 and prom, right?

8 A. Yes.

9 Q. And you looked up things on the internet, right?

10 A. Yeah, I wanted to be accurate. I had just said the spring,  
11 and so I wanted to, you know, provide more detail.

12 Q. And so you compared it to the release date of *Primal Fear*,  
13 right?

14 A. Right.

15 Q. You compared it to your friends' memories of when prom was,  
16 right?

17 A. Right.

18 Q. And that led you to be pretty confident that the trip  
19 occurred in April of '96, right?

20 A. Right.

21 Q. And that's how you reconstructed your memory that it was  
22 April of 1996?

23 MS. POMERANTZ: Objection, your Honor.

24 THE COURT: What are the grounds? One-word grounds.

25 MS. POMERANTZ: Just mischaracterization.

LCAVMAX4

A. Farmer - cross

1 THE COURT: Overruled.

2 Q. Right?

3 A. Right.

4 Q. You wanted to be accurate?

5 A. Yes.

6 Q. So you checked it against dates and you checked it against  
7 other people's memories, right?

8 A. Right.

9 Q. That's how you make sure it's accurate?

10 MS. POMERANTZ: Objection, your Honor.

11 THE COURT: Overruled.

12 Q. Right?

13 A. That's how I make sure --

14 Q. Your memory is accurate.

15 A. In general?

16 Q. In this case.

17 A. In this case that's what I did, yes. I said that, yes.

18 Q. Talking about things that happened 25 years ago, right?

19 A. Right.

20 Q. You also were trying to figure out or you were telling him  
21 about the dates of your trip to Thailand, Mr. Baker?

22 A. That's right.

23 Q. And you were able to tell Mr. Baker the dates of your trip  
24 to Thailand because you always remember you went on your  
25 birthday?

LCAVMAX4

A. Farmer - cross

1 A. Right.

2 Q. And you have pegged your memory of going to Thailand with  
3 your birthday, which was in early July?

4 A. Right.

5 Q. And so you were able to remember the dates of your trip to  
6 Thailand by reference to your birthday?

7 A. Right.

8 Q. And you're sure that you went to Thailand in the summer of  
9 1996, right?

10 A. Right.

11 MS. MENNINGER: And we can take that down now.

12 Q. There would be records of you going to Thailand in the  
13 summer of 1996 presumably; correct?

14 A. What kind of -- I mean --

15 Q. You traveled abroad.

16 A. I'm sure they are somewhere. This was before digital  
17 records, but --

18 Q. You had a passport?

19 A. Yes, yes, for sure.

20 Q. You crossed borders?

21 A. Yeah, those records, yeah. I don't have those, but yeah.

22 Q. You went with a school organization?

23 A. Global Roots, yeah; it was a nonprofit.

24 Q. So presumably there are records somewhere that substantiate  
25 the date of your trip.

LCAVMAX4

A. Farmer - cross

1 A. Right.

2 MS. MENNINGER: Can I have one moment, your Honor?

3 THE COURT: You may.

4 (Counsel conferred)

5 BY MS. MENNINGER:

6 Q. You talked on direct about the fact that you -- let me make  
7 sure I've got my quote accurate. You talked generally about  
8 once you got to New Mexico, that Ghislaine did not seem  
9 surprised to see you there.

10 A. Right.

11 Q. And that you felt more comfortable because she was there.

12 A. Yes.

13 Q. Originally, your sister Maria was going to accompany you on  
14 this trip to New Mexico; correct?

15 A. I don't remember that.

16 Q. Well, do you remember meeting with the FBI in 2006?

17 A. I do remember that meeting.

18 Q. Okay. And just as a side note, you, I think, testified on  
19 direct that you believed the meeting with the FBI was in either  
20 2006 or 2007?

21 A. Yeah. I had holiday decorations up, so I remember it was  
22 that late in the year.

23 Q. Well, earlier you have said that you remembered it was 2007  
24 because you remembered it being hot out. Do you remember that  
25 statement?

LCAVMAX4

A. Farmer - cross

1 MS. POMERANTZ: Objection, your Honor.

2 THE COURT: Time frame.

3 You're talking about her testimony on direct?

4 MS. MENNINGER: Well, no, your Honor, I apologize.

5 THE COURT: Sustained.

6 MS. MENNINGER: Let me be more clear.

7 BY MS. MENNINGER:

8 Q. In past interviews, you were trying to reconstruct the date  
9 of your interview with the FBI, do you remember that? You were  
10 asked to talk about when that meeting was?

11 A. Do you remember what interview -- what --

12 Q. Let me come back to it just to make sure I'm accurate.

13 But, in any event, you spoke to them in 2006 or 2007 is your  
14 memory now?

15 A. Right.

16 MS. MENNINGER: And so if I could have the witness  
17 look at 3514-001.

18 Q. And if you look at this document, does that refresh your  
19 memory about when your first meeting with the FBI was?

20 A. Yes.

21 Q. And that was in November of 2006?

22 A. Yes.

23 Q. And the actual interview was on November 15th, 2006 at the  
24 bottom of the page; correct?

25 THE COURT: Can you make it larger please?



LCAVMAX4

A. Farmer - cross

1 MS. MENNINGER: Yes.

2 Q. The interview was on November 15th of 2006 at your home in  
3 Austin, Texas; correct?

4 A. That's correct.

5 Q. And then the date of the report was a couple of weeks  
6 later. If we could look at the top of the page. November  
7 28th.

8 A. Yes.

9 Q. And so on page 2 of that document, in the second full  
10 paragraph, the last sentence of that paragraph, what you told  
11 the FBI in November of 2006 is that originally Maria was going  
12 to accompany Annie to New Mexico; correct?

13 A. I see it says that.

14 Q. And that's what you told the FBI in November of 2006;  
15 correct?

16 A. I don't recall that, but I see that that's written here.

17 MS. POMERANTZ: Your Honor, I would ask that the next  
18 sentence be read. It's for completeness of the record.

19 MS. MENNINGER: Your Honor, that's what redirect is  
20 for.

21 THE COURT: You can ask your next question.

22 BY MS. MENNINGER:

23 Q. You don't recall telling the FBI in November of 2006 that  
24 originally Maria was going to accompany you to New Mexico;  
25 correct?

LCAVMAX4

A. Farmer - cross

1 A. That's correct.

2 MS. MENNINGER: We can take it down.

3 Q. You did meet with agents at your home in November of 2006;  
4 correct?

5 A. Correct.

6 Q. Agent Kuyrkendall and Slater?

7 A. That's correct.

8 Q. And they sat down and talked to you for some time; correct?

9 A. They did.

10 Q. They were taking notes when they talked to you?

11 A. They were.

12 Q. And they are FBI agents; correct?

13 A. Yes.

14 Q. They represented themselves to be?

15 A. They did.

16 Q. And they apparently wrote a report about the interview,  
17 right?

18 A. Right.

19 Q. And they wrote in their report that originally Maria was  
20 going to accompany you, right?

21 A. They wrote that, yes.

22 THE COURT: We're going to break for lunch shortly, if  
23 this is a breaking point.

24 MS. MENNINGER: It's fine, your Honor.

25 THE COURT: Members of the jury, we'll break for about

LCAVMAX4

A. Farmer - cross

1 an hour. See you then. Enjoy your lunch.

2 (Jury not present)

3 THE COURT: Are there matters to take up before the  
4 break?

5 MS. POMERANTZ: Not from the government.

6 MS. MENNINGER: Not from us, your Honor. Thank you.

7 THE COURT: Okay. We'll reconvene in 45. And you'll  
8 let me know if there's anything to take up.

9 Thank you. Have a good lunch.

10 MS. POMERANTZ: Thank you.

11 (Luncheon recess)

12 (Continued on next page)

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LCACmax5

A. Farmer - cross

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## AFTERNOON SESSION

1:30 p.m.

THE COURT: All right. Matters to take up, counsel?

MS. POMERANTZ: Your Honor, just briefly from the government, my not amazing math skills, but I note that I think that the witness who's been on cross examination now for about the same amount of time that she was on direct examination, it would be helpful for scheduling purposes to know when we can expect to have the next witness ready.

MS. MENNINGER: I don't know, your Honor. An hour.

MS. POMERANTZ: Thank you, your Honor.

And the other question, I just -- rather not a question, just one thing I wanted to flag. I believe that, on cross examination, the witness was asked some questions about hindsight bias, which I expect to be a subject of expert testimony, and this witness, as she testified earlier on direct examination, is a psychologist. I'm not saying that there is anything to take up at this moment, but before she had taken the stand and the parties had conferred, we were asked that she wasn't going to be -- we were asked by Ms. Menninger to make sure that she wasn't going to be testifying about things in that area.

So I just wanted to flag that she is testifying as a lay witness and that she shouldn't be asked questions on cross examination that would be the subject of expert testimony.

LCACmax5

A. Farmer - cross

1           Again, I'm happy to take it up as it comes, but I just  
2 wanted to flag that for the Court.

3           MS. MENNINGER: Your Honor, I most definitely did not  
4 ask her about hindsight bias. I asked her about her  
5 impressions of situations factually in hindsight. Even when we  
6 litigated expert issues around hindsight bias, there was a  
7 clear distinction made between what is obvious to a lay juror  
8 as seeing things in hindsight versus currently. I did not use  
9 any of the expert language associated with hindsight bias. So  
10 I disagree with any characterization that that was somehow  
11 related to an opinion under 702.

12           THE COURT: All right. Are there further questions in  
13 that regard?

14           MS. MENNINGER: There are not.

15           THE COURT: Okay. Ms. Pomerantz.

16           MS. POMERANTZ: That's fine. Thank you, your Honor.

17           THE COURT: Anything else to take up?

18           MS. POMERANTZ: Not from the government. Thank you.

19           MS. MENNINGER: Not from the defense. Thank you.

20           THE COURT: We can bring the witness back, please.

21           (Witness present)

22           You may take your seat and you're welcome to remove  
23 your mask, please. Thank you.

24           We can bring the jury back in.

25           (Continued on next page)

LCACmax5

A. Farmer - cross

1 (Jury present)

2 THE COURT: Good afternoon, members of the jury. Hope  
3 you had a good lunch. Appreciate your continued attention,  
4 diligence, and patience.

5 Ms. Menninger, you may continue with your cross  
6 examination.

7 Ms. Farmer, I remind you, you are under oath.

8 You may inquire.

9 MS. MENNINGER: Thank you, your Honor.

10 BY MS. MENNINGER:

11 Q. Before you traveled from Arizona to New Mexico, I believe  
12 you testified you did not talk to Jeffrey Epstein about the  
13 trip to New Mexico; correct?

14 A. That's right.

15 Q. So, because you did not talk to him about the trip,  
16 Mr. Epstein did not tell you that Ms. Maxwell would be in New  
17 Mexico; correct?

18 A. Mr. Epstein did not.

19 Q. Mr. Epstein. I apologize. Thank you. Did not tell you  
20 Ms. Maxwell would be there?

21 A. Correct.

22 Q. And you did not talk to Ms. Maxwell ever before you arrived  
23 in New Mexico; correct?

24 A. Correct.

25 Q. The information about the New Mexico trip came from your

LCACmax5

A. Farmer - cross

1 mother?

2 A. Correct.

3 Q. As far as planning for the trip to New Mexico, you don't  
4 know how you got the ticket or things like that, the logistics?

5 A. How the ticket was delivered, no, I don't know.

6 Q. When you arrived in New Mexico, you do not recall Ghislaine  
7 ever saying to you she knew you would be there; correct?

8 A. I don't have a memory of her saying those words.

9 Q. And you don't remember her saying anything to you about the  
10 travel or the trip; right?

11 A. About the actual, like, logistical travel?

12 Q. Right.

13 A. I don't have a memory of that.

14 Q. And that's consistent with her perhaps thinking that your  
15 sister was going to be coming with you; correct?

16 MS. POMERANTZ: Objection.

17 THE COURT: Sustained.

18 Q. You have no personal knowledge that Ghislaine made any of  
19 your travel plans; correct?

20 A. I do not.

21 Q. And you have no personal knowledge that she encouraged you  
22 to travel to New Mexico; right?

23 A. I do not.

24 Q. Or enticed you to travel to New Mexico?

25 MS. POMERANTZ: Objection.

LCACmax5

A. Farmer - cross

1 THE COURT: Sustained.

2 Q. Transported you to New Mexico?

3 MS. POMERANTZ: Objection.

4 THE COURT: I'll allow it.

5 A. Do I have personal knowledge that Maxwell -- sorry.

6 Q. Ghislaine transported you to New Mexico.

7 A. No.

8 Q. You have no knowledge that she did; correct?

9 A. Correct.

10 Q. The trip that you took to New Mexico was from a Friday to a  
11 Sunday; right?

12 A. Yes.

13 Q. That was over a weekend?

14 A. Right.

15 Q. It wasn't in the middle of the week?

16 A. Correct.

17 Q. It wasn't Wednesday to Friday, for example?

18 A. That's right.

19 Q. And you and your mother have discussed this and you both  
20 recall that it was over a weekend; right?

21 A. That's correct.

22 Q. And you told the government that you had talked with your  
23 mother about that topic?

24 A. That's right.

25 Q. And you and your mother have the same memory of it being



LCACmax5

A. Farmer - cross

1 over the weekend?

2 A. Yes.

3 Q. You have seen flight logs that are held in connection with  
4 this case; correct?

5 A. I do not recall seeing flight logs about this. Flight logs  
6 about me going to New Mexico?

7 Q. I want to be very clear. You're not on any flight logs, to  
8 your knowledge; right?

9 A. I don't know of being on any flight logs.

10 Q. You never told anyone that you traveled on Epstein's  
11 private plane?

12 A. No. Sorry. I was confused.

13 Q. Right?

14 A. That's correct.

15 Q. You and I have to be careful not to speak over one another.  
16 I will try.

17 You have no reason to believe you were on a flight log  
18 related to Mr. Epstein's private plane; right?

19 A. Right.

20 Q. Because you never traveled on Mr. Epstein's private plane;  
21 correct?

22 A. Correct.

23 Q. Have you ever reviewed the flight logs related to  
24 Mr. Epstein's private plane in connection with anything?

25 A. No.

LCACmax5

A. Farmer - cross

1 Q. So you don't know whether there is a flight log entry  
2 showing either Ghislaine Maxwell or Jeffrey Epstein traveling  
3 to New Mexico over a weekend in April of 1996; right?

4 A. I do not.

5 Q. While you were at the ranch, there were other people there,  
6 I believe you testified?

7 A. Yes.

8 Q. There was a driver that took you to and from the airport?

9 A. Yes.

10 Q. There were other ranch hands working there?

11 A. There were.

12 Q. There was actually, I think you did not mention on direct a  
13 chef who was present; correct?

14 A. I -- I don't have a lot of memories of that.

15 Q. You don't recall a chef who made meals for you while you  
16 were at the ranch?

17 A. I don't recall a person doing that, but that makes sense to  
18 me, that there was a chef there.

19 Q. If I could refresh your memory by having you look at  
20 3514-001, and this is the same 2006 document we looked at  
21 earlier, page 3.

22 A. Is this in the binder?

23 Q. We're going to show it to you on the screen because it will  
24 be easier than you flipping to it. But if you want to see the  
25 whole document, let us know.

LCACmax5

A. Farmer - cross

1           So if we can look at the second full paragraph, in  
2 other words the last paragraph on that page and call that out.  
3 If you could take a look just at this paragraph, Ms. Farmer,  
4 and see if this refreshes your memory about a chef.

5 A. Yes.

6 Q. And this is --

7 A. Sorry.

8 Q. And this is from your conversation with the FBI in 2006?

9 A. Right. I still don't have, like, an image in my mind of  
10 the chef, but I see that that is a part of the notes from that  
11 interview, yes.

12 Q. And so, understanding all of this is taking place a long  
13 time ago, is it your belief that, in 2006, you had a memory of  
14 a chef preparing dinner for all three of you?

15 A. Yes.

16           MS. POMERANTZ: Objection.

17           THE COURT: Just a minute. Overruled.

18 Q. You may answer. Do you want me to rephrase it?

19 A. I think I got it.

20           Yes.

21 Q. As you sit here now, you believe that, in 2006, you had a  
22 memory of a chef who prepared a meal for all three of you?

23 A. That's what I'm taking from reading this.

24 Q. But you don't have that memory today?

25 A. Right.

LCACmax5

A. Farmer - cross

1 MS. MENNINGER: We can take that down. Thank you.

2 Q. There were other people on the ranch that were working  
3 there; right?

4 A. Yes.

5 Q. You don't have a memory of their names or things like that?

6 A. I do not.

7 Q. Their faces?

8 A. Not really. I mean, I have a little better image in my  
9 mind of, like, the ranch hand I was talking about, but I  
10 don't -- I couldn't identify him.

11 Q. During your involvement with this case, the government has  
12 never shown you photographs of people who worked on the ranch  
13 to see if that refreshed your memory; correct?

14 A. Not that I recall.

15 Q. So you don't have a refreshed memory about the people that  
16 worked on the ranch?

17 A. Right.

18 Q. You testified on direct that there was a small residence  
19 that you were staying in at the ranch?

20 A. Right.

21 Q. The ranch is a large piece of land; correct?

22 A. That's right. Yes.

23 Q. When you referred to the ranch, you're talking about the  
24 large piece of land?

25 A. Yes.

LCACmax5

A. Farmer - cross

1 Q. And on that large piece of land, I think you testified  
2 there was a movie set that you visited, an old movie set?

3 A. Right.

4 Q. And there was a small residence and that's where you  
5 stayed?

6 A. Right.

7 Q. You did not stay at the big, glorious Zorro Ranch that  
8 Mr. Epstein owned later; correct?

9 A. Correct.

10 Q. You did not see the big, glorious Zorro Ranch while you  
11 were there; right?

12 A. No.

13 Q. And you certainly didn't stay in the big, glorious Zorro  
14 Ranch while you were there; right?

15 A. I did not.

16 Q. You've seen those photos on news accounts since then;  
17 right?

18 A. I've seen a couple photos of that, yes.

19 Q. And so that big, huge mansion-like place is not what you  
20 saw?

21 A. Correct.

22 Q. And it's not where you stayed?

23 A. Correct.

24 Q. So if another witness said that they saw a big, glorious  
25 ranch in '94, '95, that's inconsistent with your memory of the

LCACmax5

A. Farmer - cross

1 buildings on the ranch?

2 MS. POMERANTZ: Objection.

3 THE COURT: Sustained.

4 Q. You have no memory of a big glorious mansion on the ranch?

5 A. I know there were other buildings, as I said, but I don't  
6 have much memory about what the others were because we weren't  
7 spending time in them.

8 Q. You took a tour of the whole ranch while you were there;  
9 right?

10 A. I took a tour out to the movie set. It was more of an  
11 outdoor -- as I said, we were seeing the horses and we were  
12 seeing the movie set.

13 Q. No one took you on a tour by a place under construction?

14 A. I don't -- I have no memory of that.

15 Q. You went on a shopping trip that you talked about on direct  
16 examine; correct?

17 A. That's correct.

18 Q. You went to a natural grocery store?

19 A. That's correct.

20 Q. You went to a western wear store?

21 A. Yes.

22 Q. That's where Epstein bought you cowboy boots?

23 A. That's correct.

24 Q. I don't think you mentioned on direct, but you also went  
25 horseback riding while you were on the ranch; correct?

LCACmax5

A. Farmer - cross

1 A. That does sound familiar, yes. That did happen.

2 Q. Well, you actually spent a significant amount of time  
3 horseback riding while you were at the ranch?

4 A. A significant amount of time?

5 Q. Horseback riding while were you at the ranch.

6 A. Is that a question?

7 Q. Yes. Did you spend a significant amount of time horseback  
8 riding while were you at the ranch?

9 A. I wouldn't say significant. I don't remember going on more  
10 than one occasion.

11 MS. MENNINGER: If I could direct the witness's  
12 attention to 3514-001, page 2, the last paragraph on that page.  
13 This, again, is from the 2006 interview.

14 Q. What you relayed to the FBI agents in 2006 is that you  
15 spent a significant amount of time horseback riding on the  
16 ranch; correct?

17 A. That's this document, yes.

18 Q. That the FBI took notes of in 2006?

19 A. Yes.

20 Q. And you told them that right after you told them about  
21 buying cowboy boots?

22 A. Right.

23 Q. And you told them that right after you told them about  
24 going shopping at the store for the natural food products;  
25 right?

LCACmax5

A. Farmer - cross

- 1 A. Right.
- 2 Q. So you went shopping at the store, you went and bought  
3 cowboy boots, and then you went horseback riding?
- 4 A. Right.
- 5 Q. For a significant amount of time?
- 6 A. That's what this says, yes.
- 7 Q. And you needed the cowboy boots to go horseback riding --
- 8 A. Horseback riding --
- 9 Q. Right --
- 10 A. I mean, you can go horseback riding without cowboy boots,  
11 but I'm sure that was the purpose, yes.
- 12 Q. I want to talk about the boots a little bit more. You said  
13 Epstein bought you those boots; correct?
- 14 A. Correct.
- 15 Q. And you kept the boots; right?
- 16 A. Yes.
- 17 Q. You kept them for 25 years?
- 18 A. Yes.
- 19 Q. Quarter of a century; right?
- 20 A. Yes.
- 21 Q. And you chose to wear the boots?
- 22 A. Yes.
- 23 Q. You wore them a lot?
- 24 A. In more recent years, yes.
- 25 Q. We'll talk about that.



LCACmax5

A. Farmer - cross

1           At some point in the course of this case, you handed  
2 those boots over to the government; correct?

3 A. Correct.

4 Q. That actually happened earlier this year?

5 A. That's right.

6 Q. The FBI agent came to your house and picked up the boots  
7 from you there in Texas; right?

8 A. That's right.

9 Q. That was in or about June 29th?

10 A. Yes.

11           MS. MENNINGER: I would like to have the witness  
12 identify what we would mark for identification as AF9. I  
13 believe an agent or detective has those boots. If they could  
14 be handed to the witness.

15           THE COURT: Showing the witness what's been marked for  
16 identification as AF9.

17           MS. MENNINGER: May I approach the witness, your  
18 Honor?

19           THE COURT: You may.

20 BY MS. MENNINGER:

21 Q. Ms. Farmer, do you know what's in the bag?

22 A. I do.

23 Q. What is it?

24 A. Cowboy boots.

25 Q. Are those the boots that Mr. Epstein bought you?

LCACmax5

A. Farmer - cross

1 A. Yes.

2 Q. Could you remove them from the bag, please.

3 THE COURT: Are you moving them?

4 MS. MENNINGER: Yes, your Honor. May I move for the  
5 admission of AF9?

6 MS. POMERANTZ: No objection.

7 THE COURT: AF9 are admitted.

8 (Defendant's Exhibit AF9 received in evidence)

9 Q. So those boots are in your size; right?

10 A. I think they're a little smaller than my current size, but  
11 yes.

12 Q. And those are the same boots that you recall having been  
13 purchased in 1996; right?

14 A. Yes.

15 Q. And fair to say that the heels are worn down on the boots?

16 A. Yeah.

17 Q. Fair to say that the toes of the boots are pretty well  
18 scuffed; right?

19 A. Yes.

20 Q. And the leather looks like it's been worn a couple times;  
21 right?

22 A. Yeah.

23 Q. Now, you testified on direct that you reclaimed the boots;  
24 right?

25 A. Yes.

LCACmax5

A. Farmer - cross

1 Q. And you said that you reclaimed them after the government  
2 and you spoke in 2006?

3 A. That's right.

4 Q. So in 2006, you knew that the boots were evidence of your  
5 interactions with Mr. Epstein; right?

6 A. That's right.

7 Q. And the government didn't ask you for them then?

8 A. They asked if I had them.

9 Q. And what did you tell them?

10 A. I wasn't sure.

11 Q. And you later found them?

12 A. I did.

13 Q. And you did not send them to the FBI when you found them;  
14 right?

15 A. No. At the time I had them, it didn't seem there was  
16 further -- the case did not seem to be developing.

17 Q. So you did not --

18 A. I did not send them to them.

19 Q. And you chose to wear the evidence of your contact with  
20 Mr. Epstein; right?

21 A. I did.

22 Q. And the first time you've told anyone about this reclaiming  
23 of the boots is in court today; correct?

24 A. No.

25 Q. Well, you've met with the government, I think you said five

LCACmax5

A. Farmer - cross

1 or six times; right?

2 A. Yes.

3 Q. And you've never told the government that you reclaimed the  
4 boots by wearing them after 2006; right?

5 A. I believe that we have spoken about that. I mean -- I  
6 don't know if I used the term "reclaim," but that I explained  
7 why they were not used previously and then I did wear them.

8 MS. MENNINGER: I'll raise this under Rule 16 later,  
9 your Honor.

10 Q. So you believe you've told that to the government?

11 A. I believe that I -- that part that I just said, yes, that I  
12 did not wear the boots and then I did wear the boots.

13 Q. And you wore them a lot?

14 A. I mean, because that's the general term. I didn't wear  
15 them to work or things, but I did wear them when I would go  
16 two-stepping.

17 Q. So you went dancing in the boots that Mr. Epstein bought  
18 for you?

19 A. That's correct.

20 Q. To the point where the heels are worn down and the toes are  
21 scuffed; right?

22 A. Yes.

23 Q. You can put that back in the bag. If it's in your way, I  
24 can come move it. If it's okay up --

25 A. No, it's --

LCACmax5

A. Farmer - cross

1 Q. Thank you. We talked a little bit about this conversation  
2 you had with the agents in 2006, and I believe you testified  
3 that you recall having Christmas lights up?

4 A. I said holiday decorations. I was selling some holiday  
5 products and I remember having them out when the agents came.

6 MS. MENNINGER: Just one moment. Your Honor, after  
7 the government has had a chance to look at it, I would like to  
8 show the witness what's been marked as AF10.

9 THE COURT: Okay.

10 MS. MENNINGER: Has the government had a chance?

11 MS. POMERANTZ: Yes, your Honor, and we object to  
12 this.

13 THE COURT: I'll hear from you.

14 (Continued on next page)

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LCACmax5

A. Farmer - cross

1 (At the sidebar)

2 THE COURT: I think what I'm looking at is an email  
3 from August of 2019, in which she recounts to the New York  
4 Times reporter that she thinks when they came - meaning the FBI  
5 agents - it was in spring-summer of 2007. Grounds.

6 MS. POMERANTZ: Your Honor, this is a collateral  
7 matter. She's been testifying about the interview itself, but  
8 there is no grounds to bring in extrinsic evidence on this  
9 matter with the date of the interview itself.

10 MS. MENNINGER: Your Honor, my point is simply that  
11 she refreshed her memory about when the meeting was by talking  
12 to her husband and thinking about other points, like it was hot  
13 and sunny. She did testify that it was --

14 THE COURT: But what's in issue is her memory of when  
15 she met with the FBI agents? What does that matter?

16 MS. MENNINGER: It's her memories now of things that  
17 she -- yes, about things that happened a decade ago, which, by  
18 inference, goes to the strength of her memory about things that  
19 happened in '96.

20 THE COURT: So the theory is anything testing her  
21 memory from years ago is relevant.

22 MS. MENNINGER: I wouldn't go that far, your Honor.

23 THE COURT: This is two steps removed and I'll  
24 sustain.

25 (Continued on next page)

LCACmax5

A. Farmer - cross

1 (In open court)

2 THE COURT: Sustained, 401 and 403. Go ahead.

3 BY MS. MENNINGER:

4 Q. I want to talk about the incident in the movie theater in  
5 New Mexico.

6 A. Okay.

7 Q. You testified that Epstein held your hand in the movie  
8 theater in New Mexico; right?

9 A. That's correct.

10 Q. And it was, in your words, more blatant than in New York?

11 A. Right.

12 Q. You don't actually know that Ghislaine Maxwell saw Epstein  
13 holding your hand; correct?

14 A. I don't.

15 Q. You just said she was present on the other side of him?

16 A. That's right.

17 Q. And afterwards, she didn't say anything to you about it;  
18 right?

19 A. She did not.

20 Q. She did not say, hey, were you holding his hand or anything  
21 like that?

22 A. No.

23 Q. In the movie theater, there was no touching of your  
24 breasts?

25 A. No.

LCACmax5

A. Farmer - cross

1 Q. There was no touching of your genitalia or private parts?

2 A. No.

3 Q. I want to talk to you about the foot massage that you  
4 described on direct.

5 A. Yes.

6 Q. You said that Ms. Maxwell -- Ghislaine was massaging one of  
7 Jeffrey's feet; correct?

8 A. Correct.

9 Q. And she gave you instructions on how to massage the other  
10 foot; right?

11 A. That's right.

12 Q. And at the time, you do not remember the specifics of what  
13 Epstein was saying during the foot massage; right?

14 A. No, I don't.

15 Q. You don't remember it going beyond the massaging of his  
16 foot; right?

17 A. Correct.

18 Q. And you do not remember the foot massage being sexualized;  
19 right?

20 A. I guess I would consider all of that sexualized. I  
21 don't -- it was not -- they were not touching my private body  
22 parts and I was not touching his.

23 MS. MENNINGER: If I could have the witness look at  
24 3514-12. I'll just show the first page to orient you in the  
25 upper right-hand corner. This is an interview in May --



LCACmax5

A. Farmer - cross

1 MS. POMERANTZ: Objection, your Honor.

2 MS. MENNINGER: I don't know how to orient the witness  
3 to the time, your Honor.

4 THE COURT: I'll allow you to -- it's been expanded  
5 now, so she can look at the document.

6 BY MS. MENNINGER:

7 Q. You recall speaking to the government in May of 2020;  
8 right?

9 A. Right. Yes.

10 Q. May 9th of 2020; right?

11 A. Yes.

12 Q. And you were there with some prosecutors and FBI agents;  
13 right?

14 A. Don't remember if this was in person or over the phone, but  
15 I remember having a communication, yes.

16 Q. And your attorney, Ms. McCauley, was also there?

17 A. Yes.

18 Q. If I could direct your attention to the second page, there  
19 is a section three-quarters of the way down, a paragraph. If  
20 we can call out that section that has a label.

21 If I can have you take a look at these notes.

22 A. Yes.

23 Q. What you told the government on that occasion is you do not  
24 remember it, meaning the foot massage, being sexualized;  
25 correct?

LCACmax5

A. Farmer - cross

1 A. I see that that is the note, that that's how it was  
2 described. I would say, just as what I said a minute ago, is  
3 that, in my mind, all of this was sexualized to some degree,  
4 but it did not go to touching my private body parts or me  
5 touching his.

6 Q. Ms. Farmer, what you told the government is you do not  
7 remember the foot massage being sexualized. Yes or no?

8 MS. POMERANTZ: Objection. Asked and answered.

9 THE COURT: Sustained.

10 MS. MENNINGER: I don't think I got an answer to the  
11 yes or no.

12 THE COURT: You did, and then the witness elaborated,  
13 and that's permissible, and the question has been asked and  
14 answered. So, next question.

15 Q. The notes say you do not remember --

16 MS. POMERANTZ: Objection.

17 THE COURT: Sustained.

18 Q. You said a minute ago that the notes say you do not  
19 remember it being sexualized?

20 THE COURT: Sustained.

21 Q. You also do not remember the specifics of what Mr. Epstein  
22 was saying during the foot massage; correct?

23 A. Correct.

24 Q. And that was in May of 2020; right?

25 A. Right.

LCACmax5

A. Farmer - cross

1 Q. I want to talk about the full body massage that you  
2 described.

3 A. Yes.

4 Q. You testified on direct that you had nothing on during that  
5 massage?

6 A. Yes.

7 Q. I want to direct your attention to what's been marked as  
8 AF8.

9 THE COURT: The government has it?

10 MS. MENNINGER: Yes, we spoke about it earlier in this  
11 cross examination, your Honor.

12 I gave it to you earlier in the cross examination.

13 (Continued on next page)

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LCAVMAX6

A. Farmer - cross

1 BY MS. MENNINGER:

2 Q. If I could direct your attention to the paragraph that's  
3 third from the bottom, begins with I.

4 A. Yes.

5 MS. POMERANTZ: Your Honor, objection.

6 This is not inconsistent.

7 MS. MENNINGER: What? I can't hear.

8 MS. POMERANTZ: Objection.

9 THE COURT: All right. Just a minute.

10 Let me read it.

11 Sustained.

12 MS. MENNINGER: I did not hear the basis for the  
13 objection, your Honor.

14 THE COURT: Not a prior inconsistent statement. I've  
15 ruled, Ms. Menninger. Sustained.

16 MS. MENNINGER: I'm not allowed to ask about this  
17 document at all?

18 THE COURT: You can ask the next question, but what  
19 you just drew to I've sustained.

20 BY MS. MENNINGER:

21 Q. I draw your attention to the second paragraph from the top.

22 A. Yes.

23 Q. And while you testified on direct that you had nothing on  
24 during the massage, what you told Mr. Baker from *The New York*  
25 *Times* --

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A. Farmer - cross

1 MS. POMERANTZ: Objection, your Honor.

2 THE COURT: Just a moment.

3 Q. -- is that --

4 THE COURT: Just a moment, please. There's an  
5 objection. You'll pause until I rule. Did you not hear it?

6 MS. MENNINGER: Your Honor --

7 THE COURT: Did you not hear it?

8 MS. MENNINGER: I did not hear the objection. I'm  
9 sorry, I can't hear from in here.

10 THE COURT: I understand. We'll make sure --  
11 Ms. Pomerantz, you'll speak loudly into the mic because it is  
12 difficult to hear in the box, all right?

13 MS. POMERANTZ: Yes, your Honor.

14 THE COURT: Thank you.

15 All right. I will overrule.

16 You may ask your question.

17 BY MS. MENNINGER:

18 Q. What you told Mr. Baker from *The New York Times* in August  
19 2019 is that you were not wearing a bra during the massage,  
20 that is clear in your memory; correct?

21 A. Yes.

22 Q. And what was not clear in your memory in August of 2019 is  
23 whether you had your underwear on; correct?

24 A. What I remember saying is that she asked me to undress  
25 and --

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A. Farmer - cross

1 Q. I'm asking you about the 29th.

2 THE COURT: You may answer.

3 A. That's the conversation I remember having with Mike Baker,  
4 is saying that Maxwell asked me to undress, and I did so. And  
5 I remember very clearly -- because the part of my body that was  
6 exposed during the massage was my breast. That was very clear  
7 in my memory that that was exposed.

8 Q. You were not clear in your memory whether you had your  
9 underwear on; correct?

10 A. I was not clear. You're saying in 2019, when I spoke with  
11 Mike Baker, I was not clear in my memory if I had my underwear  
12 on. I said that I remember her asking me to undress. I don't  
13 remember her saying whether or not I could leave my underwear  
14 on. And but I do remember for sure that my breasts were  
15 exposed.

16 Q. When you spoke to Mike Baker, you told him you were unsure  
17 if you had your underwear on; correct?

18 MS. POMERANTZ: Objection, your Honor.

19 THE COURT: Just a moment.

20 Overruled. I'll allow the question. You may answer.

21 A. Okay. Sorry, can you say it one more time?

22 Q. When you spoke with Mike Baker of *The New York Times*, you  
23 said that you were unsure if you had your underwear on during  
24 the massage; correct?

25 A. Yes, I said that this -- I remember very clearly part of my

LCAVMAX6

A. Farmer - cross

1 body being exposed. And I don't remember 100 percent if my  
2 underwear was on; that my best recollection is that I was  
3 undressed.

4 Q. And today you've testified that you had nothing on during  
5 the massage.

6 A. That's correct.

7 Q. So between 2019 and today, you now have a memory that you  
8 did not have your underwear on; correct?

9 A. My best recollection, as I've said, is that I was  
10 undressed. When he asked me further, I tried to clarify to him  
11 that it was a very clear memory of me not having my top on;  
12 that the other part was not as clear because that part of my  
13 body was not exposed.

14 Q. And you were clear you didn't have a bra on, that was clear  
15 in your memory?

16 A. Yes.

17 Q. That's what you told him?

18 A. That is what I told him.

19 Q. You've told this jury you didn't have your underwear on,  
20 right?

21 MS. POMERANTZ: Objection.

22 THE COURT: Sustained.

23 Q. You testified on direct that Ghislaine massaged your chest  
24 and upper breast; correct?

25 A. That's correct.

LCAVMAX6

A. Farmer - cross

1 Q. In the area of your pectoral muscles; correct?

2 A. Yeah, I guess that's all part of the breast, right?

3 Q. Ghislaine did not touch your nipples?

4 A. She did not touch my nipples.

5 Q. She did not touch your nipple area, right?

6 A. Right.

7 Q. She did not massage that part of your breast; correct?

8 A. Yes, that's correct.

9 Q. And the part that she massaged is the part that was  
10 exposed; correct?

11 A. My entire breast was exposed.

12 Q. You don't have a journal entry about that; correct?

13 MS. POMERANTZ: Objection.

14 THE COURT: Sustained.

15 Q. You have no written recollection of what happened in the  
16 massage at all; correct?

17 MS. POMERANTZ: Objection.

18 THE COURT: Asked and answered. Sustained.

19 Q. When you think back on this massage, you do not believe it  
20 was explicitly sexual; correct?

21 A. That's not correct.

22 MS. MENNINGER: I'd like to draw the witness's  
23 attention to 3514-12, page 4.

24 THE COURT: Okay.

25 MS. MENNINGER: I'm sorry, page 3.



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A. Farmer - cross

1 THE COURT: Where are we looking?

2 MS. MENNINGER: The bottom third of the page, I think.  
3 If we could call that out and expand it for everyone's benefit.

4 Q. You recall speaking with the government and the agents on  
5 May 9th of 2020, right, Ms. Farmer?

6 A. Yes.

7 Q. And you described for them this message that you're talking  
8 about now, right?

9 A. Yes.

10 Q. And what you told the agents and the government in May of  
11 2020 is that the body massage was awkward and uncomfortable,  
12 but not explicitly sexual; correct?

13 A. I don't believe those are my words; I think that's what's  
14 noted here. It says no touching of nipples, genitals, etc.,  
15 and I did clarify that, but that did not happen.

16 Q. "Not explicitly sexual" is what you said; correct?

17 MS. POMERANTZ: Objection, your Honor.

18 THE COURT: Sustained.

19 Q. Is it your belief that the prosecutor wrote that down wrong  
20 in May of --

21 MS. POMERANTZ: Objection.

22 THE COURT: Sustained.

23 Q. You talked about during this massage you had a sense that  
24 Epstein would be able to see you; correct?

25 A. Correct.

LCAVMAX6

A. Farmer - cross

- 1 Q. That you have no memory of him seeing you, right?
- 2 A. That's correct.
- 3 Q. He was not in the room for this massage, right?
- 4 A. That's right.
- 5 Q. I want to talk to you about what you said happened in the  
6 bed the next morning or something. Is that the right time  
7 frame, the next morning?
- 8 A. Right.
- 9 Q. You said that Epstein entered your room; correct?
- 10 A. Yes.
- 11 Q. Ghislaine Maxwell did not enter your room?
- 12 A. She did not.
- 13 Q. She was not in there the whole time this happened, right?
- 14 A. She was not in there.
- 15 Q. After it happened, you got up and went to the bathroom and  
16 stayed in the bathroom awhile, right?
- 17 A. Yes.
- 18 Q. Before you went to the bathroom, Epstein laid on the bed  
19 with you right?
- 20 A. Yes.
- 21 Q. You were not sure whether he was over the covers or under  
22 the covers, right?
- 23 A. Right.
- 24 Q. He kind of had his arms around you, right?
- 25 A. Yeah.

LCAVMAX6

A. Farmer - cross

1 Q. And you do not recall this being a sexual touch either;  
2 correct?

3 A. No, I would not characterize it that way.

4 Q. Okay.

5 A. Again, he did not touch specifically my sexual body parts  
6 in that -- in that experience.

7 Q. Okay. On May 9th of 2020, you told the prosecutors and the  
8 government regarding this incident in the bed that you do not  
9 remember this being a sexual touch; correct?

10 A. Am I just to be looking at -- oh, sorry.

11 Q. Did you tell the government that on May 9th of 2020?

12 A. I don't recall saying that.

13 Q. You do recall telling them that he did not grab your  
14 breasts?

15 A. Yes.

16 Q. And didn't touch your breasts?

17 A. Yes.

18 Q. Correct?

19 Did not grab or touch your genitals; correct?

20 A. Correct.

21 Q. You testified on direct that he pressed his body into you;  
22 is that right?

23 A. That's right.

24 Q. You did not feel an erect penis in your back?

25 A. I did not -- I do not -- I couldn't say whether he had an

LCAVMAX6

A. Farmer - cross

1 erect penis; correct.

2 Q. You do not recall him pressing an erect penis into your  
3 back; correct?

4 A. Yeah, I recall him pressing his body. I do not recall an  
5 erect penis.

6 Q. And you told the government in May of 2020 that you do not  
7 recall a penis being pushed into your back; correct?

8 A. An erect penis, I don't recall those words.

9 MS. MENNINGER: Okay. If I could have the witness  
10 look at 3514-012 at page 4. And if we could highlight the  
11 first, sort of, half of the page.

12 Q. If I could have you take a look at this, Ms. Farmer.

13 A. Yes.

14 MS. POMERANTZ: Your Honor, objection.

15 This is not inconsistent.

16 THE COURT: Sustained.

17 Q. You told the government that you did not feel an erect  
18 penis in your back; correct?

19 MS. POMERANTZ: Objection, your Honor.

20 THE COURT: Asked and answered. Sustained.

21 Q. After you returned from New Mexico, you told your mother  
22 you were "not raped"; correct?

23 A. When I returned from New Mexico?

24 Q. Yes.

25 A. When I returned from the trip to Thailand. We didn't talk

LCAVMAX6

A. Farmer - cross

1 about it when I returned from New Mexico.

2 Q. When you got back from Thailand, you said you were not  
3 raped?

4 A. That's right.

5 Q. You were not sexually abused?

6 A. I said I was not raped.

7 Q. And you meant you were not sexually abused; correct?

8 MS. POMERANTZ: Objection, your Honor.

9 THE COURT: Overruled.

10 A. I think those are two different things.

11 Q. You spoke to the government on May 9th of 2020, right?

12 A. Yes.

13 Q. And I want to jump ahead about a month from that. In late  
14 June of 2020, the Epstein Victims Compensation Fund opened,  
15 right?

16 A. I don't remember when it opened, but yes.

17 MS. MENNINGER: Okay. I'd like to have the witness  
18 look at AF-12.

19 THE COURT: The government has it?

20 MS. MENNINGER: I will get them a copy, your Honor. I  
21 believe they do, but I'll give them a copy.

22 If I could have the witness take a look at the first  
23 paragraph of text and just tell me if that refreshes your  
24 memory about when the Epstein Victims Compensation Program  
25 opened.

LCAVMAX6

A. Farmer - cross

1 A. It says June 25th.

2 Q. June 25th of 2020?

3 A. Yes.

4 Q. So about a month after you spoke with the government,  
5 right?

6 A. That's right.

7 Q. And you, yourself --

8 MS. MENNINGER: We can take that down now,  
9 Ms. Lundberg.

10 Q. You, yourself submitted a claim to the Epstein Victims  
11 Compensation Program?

12 A. Yes, my attorneys submitted a claim for me.

13 Q. And you submitted your claim on the very next day, June  
14 26th of 2020; correct?

15 A. Correct.

16 Q. Your submission was substantial, 3,000 pages or so;  
17 correct?

18 A. I haven't seen the full submission.

19 Q. Okay.

20 MS. MENNINGER: If I could have the witness take a  
21 look at AF-13. And I will give a copy to the government.

22 I would like to draw the witness's attention to page  
23 12 to 13 of this document.

24 Q. Do you recognize it, I guess, as an initial matter?

25 A. Oh, yes.

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A. Farmer - cross

1 Q. And what do you recognize it to be?

2 A. This is a signature page, but just, I think, the  
3 application for the program.

4 Q. Your application to the program?

5 A. Yes.

6 Q. All right. And on page 12, do you recognize this as the  
7 document that you initialed?

8 A. I do.

9 Q. And then if we can look at page 13, there is a signature  
10 from you, is that --

11 A. That's my signature, yes.

12 Q. Okay. And that the date of this submission was June 26th  
13 of 2020; correct?

14 A. Correct.

15 MS. MENNINGER: Your Honor, I would like to move for  
16 the admission of pages 12 and 13 of this document.

17 MS. POMERANTZ: Your Honor, no objection. I do want  
18 to have to review it to see if any redactions are necessary.

19 THE COURT: Okay. I'll admit -- so let's see, this is  
20 AF-12 -- I'm sorry, AF-13, pages 12 and 13 will be temporarily  
21 submitted -- admitted under seal with an opportunity to  
22 consider whether any redactions are necessary to protect the  
23 privacy interests of a third party.

24 Is that the -- Ms. Pomerantz?

25 MS. POMERANTZ: Yes, your Honor.

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A. Farmer - cross

1 MS. MENNINGER: Your Honor, there's no one's name.

2 THE COURT: Okay.

3 MS. MENNINGER: I'd like to read from it because it's  
4 now in evidence and there's no --

5 THE COURT: All right. Give the government a minute  
6 to review. Thank you.

7 MS. POMERANTZ: I think it's fine, your Honor.

8 Thank you.

9 THE COURT: All right. Then not sealed, admitted,  
10 AF-12, pages 12 and 13. And you may publish if you like.

11 (Defendant's Exhibit AF-12 received in evidence)

12 MS. MENNINGER: Thank you, your Honor.

13 BY MS. MENNINGER:

14 Q. If I could start with page 12. Do you remember this  
15 document, that you signed it --

16 A. Yes.

17 Q. -- Ms. Farmer?

18 If I could draw your attention to the first italicized  
19 paragraph, which is the second paragraph. I would like, if you  
20 could, to read that paragraph to the jury.

21 A. I hereby certify that the information provided in this  
22 claim form and any documents provided in support of this claim  
23 are true and accurate to the best of my knowledge, and declare  
24 under penalty of perjury that the foregoing is true and  
25 correct. I understand that false statements or claims made in



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A. Farmer - cross

1 connection with this claim may result in fines, imprisonment,  
2 and/or any other remedy available by law; and that claims that  
3 appear to be potentially fraudulent or to contain information  
4 known to me to be false when made will be forwarded to federal,  
5 state, and local law enforcement authorities for possible  
6 investigation and prosecution.

7 Q. So you understood that you were signing this claim form  
8 under penalties of perjury, right?

9 A. Correct.

10 Q. And if it was later determined that your claim was  
11 potentially fraudulent, you could be referred for legal action,  
12 right?

13 A. That -- yes.

14 Q. And if you testified as something differently today, then  
15 your claim may be found potentially fraudulent; correct?

16 MS. POMERANTZ: Objection, your Honor.

17 THE COURT: Sustained.

18 MS. MENNINGER: You can take this down for the moment.

19 Thank you.

20 Q. In the claim form, you were asked where any sexual abuse  
21 occurred in support of your claim. Do you remember that  
22 question?

23 A. No. Sorry. There's a lot of questions.

24 Q. That's all right.

25 MS. MENNINGER: If we could have the witness take a

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A. Farmer - cross

1 look at -- it's that same document on page 3., and it's  
2 question 3.

3 A. I see.

4 Q. Okay. So you were asked in question 3 where -- to the best  
5 of your ability, to locate the places where sexual abuse  
6 occurred, right?

7 A. That's correct.

8 Q. And you understood to be answering this sexual abuse by  
9 Jeffrey Epstein, right?

10 A. Right.

11 Q. And Ghislaine Maxwell, right?

12 A. Mm-hmm.

13 Q. And you told the -- we can take it down -- the victims'  
14 compensation program that you were sexually abused in a movie  
15 theater in New York, right?

16 A. The box for "New York" was checked.

17 MS. MENNINGER: I'm sorry, can we bring it back up.

18 Q. There is a box under question 3?

19 A. Yeah, that's what I was saying, yes, it says New York City  
20 and New Mexico.

21 Q. And then there's a box below that.

22 A. Oh, I'm sorry. I didn't see that.

23 Q. Okay.

24 A. Yes, yes.

25 MS. MENNINGER: So now you can take it down.

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A. Farmer - cross

1 Q. Unless you need to look at it further?

2 A. No, no, no. I just wanted to read the whole entire thing.

3 Q. Okay. So we can take it down.

4 So what you told the victims compensation fund is that  
5 you were sexually abused in a movie theater in New York, right?

6 A. Right.

7 Q. And you were sexually abused in a movie theater in New  
8 Mexico?

9 A. Right.

10 Q. And both of those were related to the hand-holding  
11 incidents that happened in those two locations, right?

12 A. Yeah, that was explained in the application.

13 Q. Hand-holding was sexual abuse?

14 MS. POMERANTZ: Objection, your Honor.

15 THE COURT: Just a moment.

16 Overruled. Go ahead.

17 A. My experience was detailed in the application, which  
18 included, yes, him holding and caressing my hands. I did not  
19 say anything else happened to me in the movie theater.

20 Q. You told the victims compensation fund that you were  
21 sexually abused in a movie theater in New York; correct?

22 A. I think I answered that. Those were the boxes that are  
23 checked, yes. And then that was a small field. And then later  
24 on you describe what happened to you, and that's what I did.

25 Q. It wasn't just a box that was checked; you wrote in "movie

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A. Farmer - cross

1 theater in New York," right?

2 A. That was written in on the form.

3 Q. And a movie theater in New Mexico, right?

4 A. Yes.

5 Q. And so those were both hand-holding incidents, right?

6 A. They were the incidents that I've already described where  
7 my leg and hand was caressed, yes.

8 Q. Right. You're not saying anyone touched your private  
9 parts?

10 A. No, I was very consistent with that.

11 Q. And it's important to you that you be consistent, right?

12 MS. POMERANTZ: Objection.

13 THE COURT: Overruled.

14 A. Of course.

15 Q. So you did, as you said, submit a longer detailed version  
16 of your claim to the fund, right?

17 A. Yes.

18 Q. It wasn't just checking boxes?

19 A. Right, right, right. There was a narrative portion.

20 Q. Okay. And when you were describing the foot massage in the  
21 narrative program -- portion, excuse me, you told the victims  
22 compensation fund that Mr. Epstein kept staring at you and  
23 telling you how good the massage felt, right?

24 A. I -- I think that -- I mean -- I -- yes, I guess that is  
25 what I said. I don't remember using those words. I know I

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A. Farmer - cross

1 communicated to my attorneys and they typed it for me.

2 Q. Okay. If you would take a look at AF-13, page 22, second  
3 full paragraph. And the second sentence from the bottom, does  
4 that refresh your recollection about what you told the victims  
5 compensation fund about the foot massage?

6 A. Yes.

7 Q. And what you told them is that Mr. Epstein kept staring at  
8 you and telling you how good the massage felt, right?

9 A. Yes.

10 Q. And you also told them that Mr. Epstein was groaning a lot  
11 during the foot massage, right?

12 A. Yes.

13 Q. And that's not what you had told the government in May of  
14 2020, right?

15 A. I don't know if they asked me questions about that in May  
16 of 2020.

17 Q. You told them you don't remember it being sexualized,  
18 right?

19 MS. POMERANTZ: Objection, your Honor.

20 THE COURT: Sustained.

21 Q. You also described for the victims compensation fund the  
22 massage that you received in New Mexico; correct? Right?

23 A. Yes.

24 Q. And you've told the jury that the -- your chest and upper  
25 breast were massaged during the massage; correct?

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A. Farmer - cross

1 A. Correct.

2 Q. What you told the victims compensation fund is that your  
3 breasts were groped; correct?

4 A. Yes. I don't see that as significantly different, but --

5 Q. Rubbed, groped, massaged.

6 A. Yes.

7 Q. Not your nipple area, any of that?

8 A. No, she did not touch my nipples.

9 Q. But you told them your breasts were groped, right?

10 A. Yes.

11 Q. And you told us in your direct testimony that it was your  
12 chest and upper breast that were touched, right?

13 MS. POMERANTZ: Objection, your Honor.

14 THE COURT: I'll allow it. Go ahead.

15 A. Yes.

16 Q. And you believed that that -- you told the victims  
17 compensation fund that that was also sexual abuse; correct?

18 A. Yes.

19 Q. When you testified on direct about the incident in the bed,  
20 you said that Mr. Epstein had his arms around you, right?

21 A. Yes.

22 Q. And you don't remember any penis being pressed against you,  
23 right?

24 A. No --

25 MS. POMERANTZ: Objection, your Honor.

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A. Farmer - cross

1 A. You said erect penis.

2 THE COURT: Just a moment.

3 Grounds, Ms. Menninger.

4 MS. MENNINGER: For me, your Honor?

5 THE COURT: I'm sorry, Ms. Pomerantz.

6 Grounds, Ms. Pomerantz?

7 MS. POMERANTZ: Asked and answered, your Honor.

8 THE COURT: Sustained.

9 MS. MENNINGER: Your Honor, I am trying to draw her  
10 attention to direct testimony, that's all, as a foundation of  
11 further questioning.

12 THE COURT: Sustained.

13 BY MS. MENNINGER:

14 Q. Did you testify on direct that Mr. Epstein pressed his body  
15 against you?

16 A. I did.

17 Q. And what you told the Epstein Victims Compensation Fund is  
18 that he rubbed his genitals against you in the bed; correct?

19 A. Yes.

20 Q. Those are not consistent.

21 MS. POMERANTZ: Objection, your Honor.

22 THE COURT: Sustained.

23 Q. You testified on direct that on your last day in New  
24 Mexico, that Ghislaine seemed disinterested in your school  
25 project, right?

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A. Farmer - cross

- 1 A. Yes.
- 2 Q. That's not something you told the government in 2006 when  
3 you met with them, right?
- 4 A. I don't recall whether we talked about that.
- 5 Q. You never had any communication with Ghislaine after New  
6 Mexico, right?
- 7 A. That's correct.
- 8 Q. She never called you?
- 9 A. No, she did not.
- 10 Q. She didn't make any travel plans for you, right?
- 11 A. She did not.
- 12 Q. She didn't ask you to travel somewhere; correct?
- 13 A. That's correct.
- 14 Q. And you went to Thailand after this at some point, right?
- 15 A. Yes, that summer.
- 16 Q. And you accepted the money for the Thailand trip from  
17 Mr. Epstein, right?
- 18 A. I did.
- 19 Q. I think you talked a little bit on direct about the fact  
20 that you've made a number of public statements, right?
- 21 A. Yes.
- 22 Q. You've been on documentaries and podcasts, right?
- 23 A. I have.
- 24 Q. Under your real name?
- 25 A. That's correct.



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A. Farmer - cross

1 Q. And you have touted yourself in those appearances as a  
2 survivor of sexual abuse; correct?

3 MS. POMERANTZ: Objection, your Honor.

4 THE COURT: One-word grounds.

5 MS. POMERANTZ: Form.

6 THE COURT: Overruled.

7 Q. Correct?

8 A. Have I described myself as a survivor of this --

9 Q. Survivor of sexual abuse.

10 A. Yes.

11 Q. And you've gone to court in relationship to Mr. Epstein's  
12 legal proceedings, right?

13 A. I did.

14 Q. And you spoke publicly there?

15 A. Yes.

16 Q. And afterwards you met with a number of other Epstein  
17 accusers; correct?

18 A. Yes.

19 Q. You were part of a press conference with your attorneys;  
20 correct?

21 A. Yes. I mean, I was standing there. I wasn't really doing  
22 anything, but I was at the -- at the location.

23 Q. And you have had attorneys representing you in connection  
24 with this for quite some time; correct?

25 A. Yes.

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A. Farmer - cross

1 Q. You originally hired attorneys in 2016?

2 A. I don't believe I hired any attorneys at that time. I  
3 was -- I spoke with an attorney at that time.

4 Q. And certainly you had hired attorneys before you first met  
5 with the government in September of 2019; correct?

6 A. Yes.

7 Q. At your first meeting in September of 2019, your attorneys  
8 were there?

9 A. Yes, that's correct.

10 Q. Someone from the Boies Schiller firm, right?

11 A. That's right.

12 Q. And so you had a civil attorney sometime before September  
13 of 2019?

14 A. Yes.

15 Q. So the same civil attorneys that filed a lawsuit on your  
16 behalf?

17 A. They are.

18 Q. They are the same attorneys who filed the Epstein Victims  
19 Compensation Fund documents on your behalf; correct?

20 A. Correct.

21 Q. Your attorney, Ms. McCawley, is here in the courtroom  
22 wearing white; correct?

23 A. That's correct.

24 Q. She has attended numerous meetings with the government with  
25 you, right?

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A. Farmer - cross

1 A. Yes.

2 Q. She has attended prior trial testimony in this case at this  
3 courthouse; correct?

4 A. Yes.

5 Q. She has sat in the overflow room for that portion; correct?

6 A. She did.

7 Q. And she's listened to the testimony of other witnesses;  
8 correct?

9 A. Yes.

10 MS. POMERANTZ: Objection, your Honor.

11 THE COURT: Sustained.

12 Q. You talked on direct about your lawyers representing you  
13 *pro bono*; correct?

14 A. That's right.

15 Q. You do not know your lawyers' arrangements with other of  
16 their clients; correct?

17 MS. POMERANTZ: Objection.

18 THE COURT: Sustained.

19 Q. Do you know how much money your lawyers have made in  
20 connection with Epstein claims?

21 MS. POMERANTZ: Objection.

22 THE COURT: Grounds.

23 MS. POMERANTZ: Foundation.

24 Beyond the scope of her knowledge, your Honor.

25 THE COURT: I'll sustain on foundation.

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A. Farmer - cross

1 Q. Have you read anywhere in the press how much money your  
2 lawyers have made in connection with representing Epstein  
3 accusers?

4 MS. POMERANTZ: Objection. Hearsay.

5 THE COURT: Sustained.

6 Q. You know that Virginia Roberts was also represented by your  
7 attorneys; correct?

8 MS. POMERANTZ: Objection.

9 MS. MENNINGER: I can lay a foundation.

10 THE COURT: You may inquire.

11 MS. POMERANTZ: Relevance and hearsay.

12 Q. You were preparing to testify in a civil case?

13 THE COURT: Just a minute.

14 MS. MENNINGER: Oh, I'm sorry.

15 THE COURT: If there's an objection, you have to give  
16 me a minute to rule.

17 MS. MENNINGER: I thought you had, your Honor.

18 I apologize.

19 THE COURT: I had on the prior ones.

20 Overruled. You may inquire.

21 BY MS. MENNINGER:

22 Q. You were preparing to testify in a civil case in or around  
23 2016 or 2017; correct?

24 A. Correct.

25 Q. And the lawyers you were interacting with in that case, the

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A. Farmer - cross

1 civil case, were the same lawyers from Boies Schiller; correct?

2 A. In part.

3 Q. And also Mr. Edwards; correct?

4 A. Correct.

5 Q. And you know that in connection with that civil case, your  
6 lawyers, Ms. McCawley and Mr. Edwards, represent Virginia  
7 Roberts; correct?

8 MS. POMERANTZ: Objection, your Honor.

9 THE COURT: Foundation objection?

10 MS. POMERANTZ: Relevance.

11 THE COURT: Ms. Pomerantz, you inquired as to *pro bono*  
12 representation; correct? Is that correct?

13 MS. POMERANTZ: Yes, your Honor.

14 THE COURT: All right. I'll overrule.

15 A. Can you repeat the question?

16 Q. You know that Ms. McCawley and Mr. Edwards represent  
17 Virginia Roberts?

18 A. Yes.

19 Q. Correct?

20 A. Yes.

21 Q. In connection with civil litigation?

22 A. Yes.

23 Q. And you were prepared to testify in that civil litigation;  
24 correct?

25 A. I was.

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A. Farmer - cross

1 Q. And you know that Mr. Edwards is representing other people  
2 in this criminal case; correct?

3 MS. POMERANTZ: Objection, your Honor.

4 THE COURT: Just a moment. Overruled.

5 A. I do know that.

6 Q. And you know that your attorney represents other  
7 individuals who have accused Epstein; correct?

8 MS. POMERANTZ: Objection.

9 THE COURT: Just a moment. Overruled.

10 A. Yes.

11 Q. You've been in touch with a number of other Epstein  
12 accusers in many different forms and fashion; correct?

13 MS. POMERANTZ: Objection. Vague. Confusing.

14 THE COURT: Okay. You can specify please.

15 Q. Okay. Are you a part of a WhatsApp group of Epstein  
16 accusers?

17 A. Yes.

18 Q. You communicated with other Epstein accusers on the  
19 WhatsApp for those accusers?

20 A. Correct.

21 Q. You've emailed with other accusers; correct?

22 A. I have.

23 Q. You directly emailed with Virginia Roberts; correct?

24 A. I have.

25 Q. You have been with other Epstein accusers in connection

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A. Farmer - cross

1 with your media appearances, right?

2 A. You mean when they were at the courtroom and filming  
3 everyone?

4 Q. Right.

5 A. Yes.

6 Q. You know that your attorneys from Boies Schiller were a  
7 part of setting up the Epstein Victims Compensation Fund;  
8 correct?

9 MS. POMERANTZ: Objection, your Honor.

10 THE COURT: Just a moment.

11 One-word grounds.

12 MS. POMERANTZ: Hearsay and privilege.

13 THE COURT: You can inquire as to foundation.

14 Q. I'm not trying to ask you about things that you've learned  
15 in connection with your --

16 THE COURT: Just ask.

17 Q. -- communications --

18 THE COURT: I'll deal with that, but just ask the  
19 question. I'll either sustain or overrule.

20 Q. You are aware it's a matter of public record that your  
21 attorneys --

22 MS. POMERANTZ: Objection, your Honor.

23 THE COURT: Foundation. Ask the foundation question  
24 first and then we'll see.

25 MS. MENNINGER: Okay.

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A. Farmer - cross

1 Q. It's in the newspapers that your attorneys helped set up  
2 the Epstein Victims Compensation Fund?

3 MS. POMERANTZ: Objection, your Honor.

4 THE COURT: Is the question is she aware of that? Is  
5 that the question?

6 MS. MENNINGER: Yes, your Honor.

7 THE COURT: Okay.

8 A. Yes.

9 Q. And so you are aware that it is a matter of public  
10 knowledge that your attorneys helped set up the Epstein Victims  
11 Compensation Program?

12 MS. POMERANTZ: Your Honor, objection to this entire  
13 line of questioning.

14 THE COURT: Yes, I gather.

15 MS. POMERANTZ: This calls for hearsay.

16 THE COURT: I asked for foundation. We got the  
17 foundation. And now on this question, one question at a time.

18 I sustain.

19 BY MS. MENNINGER:

20 Q. You participated in that fund; correct?

21 A. I did.

22 Q. You accepted an offer from that fund?

23 A. I did.

24 Q. You were paid one and a half million dollars?

25 A. I was.



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A. Farmer - cross

1 Q. And was based on the same things that you've testified in  
2 this courtroom today; correct?

3 A. That's correct.

4 Q. The sexual abuse in a movie theater, right, is one of those  
5 things?

6 A. As one of the things, yes.

7 Q. Right.

8 MS. MENNINGER: Your Honor, at this time I would  
9 offer -- I would ask to show, excuse me, the witness AF-14.  
10 And I'll provide a copy to the government.

11 MS. POMERANTZ: No objection, your Honor.

12 THE COURT: Okay.

13 MS. MENNINGER: If I could show the witness page 2 of  
14 that document as well, and page 3, and the last page.

15 Q. That's your signature, Ms. Farmer; correct?

16 A. Yes.

17 Q. That was in October of 2020?

18 A. That's correct.

19 Q. This form is the release form that you signed in connection  
20 with accepting the offer from the victims compensation program,  
21 right?

22 A. That's right.

23 Q. And it details the one and a half million dollars that you  
24 received, right?

25 A. That's right.

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A. Farmer - cross

1 MS. MENNINGER: I would move for the admission of  
2 AF-14, your Honor.

3 MS. POMERANTZ: No objection, your Honor.

4 THE COURT: AF-14 is admitted.

5 (Defendant's Exhibit AF-14 received in evidence)

6 THE COURT: No redaction requests here?

7 MS. POMERANTZ: No, your Honor.

8 THE COURT: 14 is admitted.

9 MS. MENNINGER: We can take it down now, Ms. Lundberg.

10 BY MS. MENNINGER:

11 Q. In connection with some of your public appearances, you  
12 have described the fact that you are a psychologist; correct?

13 A. That's correct.

14 Q. And you have described the fact that you work with victims  
15 of sexual trauma; correct?

16 A. Amongst other types of, yeah, clients, I do.

17 Q. And you know that it gives you more credibility with future  
18 clients --

19 MS. POMERANTZ: Objection.

20 Q. -- if you mention your profession in connection with your  
21 media appearances, right?

22 THE COURT: Just a moment.

23 There's an objection to that question?

24 MS. POMERANTZ: That's fine, your Honor. Withdrawn.

25 THE COURT: Go ahead.

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A. Farmer - cross

1 A. The question is whether it gives me more credibility to be  
2 a victim?

3 Q. It gives you more credibility with future clients if you  
4 mention your experience during your media appearances; correct?

5 A. My personal experience or my professional experience?

6 Q. Your personal experiences.

7 A. I guess I would say that that is probably not -- people  
8 have different opinions about that, about whether that would  
9 give you credibility or not.

10 Q. You certainly have not shied away from telling in your  
11 public appearances the fact that you are, yourself, trained as  
12 a psychologist, right?

13 A. I have shared that.

14 Q. We've talked previously about the fact that you spoke with  
15 the FBI in 2006, right?

16 A. Yes.

17 Q. That was with Agent Nesbitt Kuyrkendall, right?

18 A. Right.

19 Q. You did not tell Agent Kuyrkendall in 2006 that you wanted  
20 Mr. Epstein prosecuted; correct?

21 MS. POMERANTZ: Objection, your Honor.

22 THE COURT: Sustained.

23 I'll hear from you, if you'd like.

24 MS. MENNINGER: Yes. Please. I'm not clear.

25 THE COURT: Sure.

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A. Farmer - cross

1 (At sidebar)

2 THE COURT: State your ground.

3 MS. POMERANTZ: Your Honor, I don't understand the  
4 relevance of this question. It seems just like a wholly  
5 improper question, what she was asking, whether she asked the  
6 FBI to prosecute Jeffrey Epstein at this time. I just don't  
7 even understand the question.

8 MS. MENNINGER: Your Honor, Agent Kuyrkendall signed a  
9 declaration in 2017 and she said that she spoke to a number of  
10 victims between '06 and '08, and none of them expressed an  
11 opinion that they wanted Epstein prosecuted. Now, she clearly,  
12 in 2019, did want Epstein prosecuted.

13 THE COURT: She's the witness.

14 MS. MENNINGER: What's that?

15 THE COURT: She's the witness subpoenaed to testify.  
16 Her motivation --

17 MS. MENNINGER: I'm asking what she said to --

18 THE COURT: Right, but --

19 MS. MENNINGER: Okay. You want me to ask the  
20 motivation? I see.

21 THE COURT: Well, I don't understand -- well, I'll  
22 sustain the objection to the question asked --

23 MS. MENNINGER: Okay.

24 THE COURT: -- about what she told an agent --

25 MS. MENNINGER: Okay.

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A. Farmer - cross

1 THE COURT: -- in 2006.

2 What's the next question?

3 MS. MENNINGER: It would just be, You did not want  
4 Epstein prosecuted in 2006?

5 THE COURT: You want to ask her if she wanted Epstein  
6 prosecuted in 2006?

7 MS. MENNINGER: Yes.

8 THE COURT: What is the relevance of that?

9 MS. MENNINGER: Because she's changed her mind about  
10 wanting people prosecuted in connection with this case. She  
11 has a different bias today than she did in 2006; that she  
12 brought up her lawsuit in connection with applying to the fund  
13 and filing a civil lawsuit. When she didn't have those  
14 motivations in 2006, she didn't want to prosecute. It's a  
15 clear distinction in two different periods of time, 15 years  
16 apart. It goes to our money theme, your Honor, that we opened  
17 on.

18 MS. POMERANTZ: Your Honor, I just don't see the  
19 relevance or basis for this line of questioning.

20 THE COURT: You're going to ask her if she wanted  
21 Epstein prosecuted in 2006. And if she says yes, then what?

22 MS. MENNINGER: Agent Kuyrkendall is under subpoena,  
23 your Honor, and testified that none of the victims she talked  
24 to in '06 to '08 wanted them prosecuted.

25 THE COURT: You're not doing that. I've ruled on

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A. Farmer - cross

1 that.

2 MS. MENNINGER: What she told the agent about  
3 prosecution.

4 MS. MOE: Your Honor, I think we're confusing two  
5 issues: Whether or not she told the FBI she wanted him  
6 prosecuted and asked them to do that and whether she, in fact,  
7 wanted that to happen. I think what she's proposing is  
8 impeaching her in the absence of a statement to the FBI.

9 THE COURT: I think that's right. You can ask her, I  
10 suppose, if she wanted him prosecuted in 2006. I'm not going  
11 to allow --

12 MS. MENNINGER: I know with this witness I'm not. If  
13 we get into --

14 THE COURT: We'll get into that when we get into that.

15 MS. MENNINGER: That's right.

16 THE COURT: But not what you told.

17 MS. MENNINGER: I understand.

18 MS. MOE: We're now about an hour and 15 minutes.

19 THE COURT: There have been a lot of objections.

20 (Continued on next page)

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A. Farmer - redirect

1 (In open court)

2 BY MS. MENNINGER:

3 Q. Ms. Farmer, in 2006, you did not want Jeffrey Epstein  
4 prosecuted; correct?

5 A. I don't recall that being the case.

6 Q. You didn't want him prosecuted because no crime had been  
7 committed; correct?

8 MS. POMERANTZ: Objection.

9 THE COURT: Sustained.

10 MS. MENNINGER: If I may have one moment to confer  
11 with my client, your Honor?

12 THE COURT: You may.

13 (Counsel conferred with defendant)

14 MS. MENNINGER: No further questions at this time,  
15 your Honor.

16 THE COURT: Ms. Pomerantz?

17 MS. POMERANTZ: Your Honor, may I just have one moment  
18 please?

19 REDIRECT EXAMINATION

20 BY MS. POMERANTZ:

21 Q. Good afternoon, Annie.

22 A. Good afternoon.

23 Q. How, if at all, have you struggled to process your  
24 experiences with Maxwell and Epstein?

25 A. I think it's been -- it was a very upsetting and confusing

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A. Farmer - redirect

1 situation. And I think for a long time I just really didn't  
2 want to think about it. And then, you know, of course, it has  
3 come up again and again, and so with, you know -- I have  
4 thought a lot more about it and it -- it's just -- it causes  
5 discomfort, and yeah. I don't know what to say.

6 Q. You were asked questions on cross-examination about your  
7 journal. Do you remember that?

8 A. Yes.

9 Q. Did you give the government every entry from your journal  
10 that has anything to do with this case?

11 A. Yes.

12 Q. What's the subject matter of the rest of your -- of that  
13 journal from when you were 16 years old?

14 A. Very high school kind of things. There's a journal entry  
15 about the day that --

16 Q. I should say, without sharing any details, just generally,  
17 what was the subject matter of the rest of your teenage  
18 journal?

19 A. A favorite musician died, and I wrote that I was very sad  
20 about it. Going -- like social things, friend things, things  
21 like that.

22 Q. Did you write about private matters?

23 A. Yes.

24 Q. Do you recall being asked about your first interview with  
25 the FBI in 2006?



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A. Farmer - redirect

1 A. Yes.

2 Q. When you spoke with the FBI in 2006, did you have a lawyer?

3 A. I did not.

4 Q. When you spoke with the FBI in 2006, did you tell the FBI  
5 about Maxwell massaging your breasts?

6 A. Yes.

7 Q. When you spoke with the FBI in 2006, did you tell the FBI  
8 about Epstein getting into bed with you?

9 MS. MENNINGER: Objection. Leading, your Honor.

10 THE COURT: Sustained.

11 Q. Do you recall Ms. Menninger asking you about a particular  
12 statement you made in connection with the 2006 interview  
13 conducted by the FBI?

14 A. Yes.

15 Q. I believe she showed you a particular document to refresh  
16 your recollection.

17 MS. POMERANTZ: Can we pull up 3514-001.

18 Q. And I want to direct your attention to the second full  
19 paragraph on page 2.

20 A. Yes.

21 Q. And directing your attention to the last sentence. She  
22 directed you to the first half of the sentence, but I would  
23 like to direct you to the full sentence.

24 A. Yes.

25 Q. After you told the FBI that Maria was supposed to go on the

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A. Farmer - redirect

1 trip to New Mexico, what's the very next thing you said to the  
2 FBI?

3 MS. MENNINGER: Objection.

4 Hearsay. Foundation, your Honor.

5 THE COURT: Overruled.

6 This was the sentence Ms. Pomerantz asked you to read  
7 in context. And I believe your words were, That's what  
8 redirect is for.

9 MS. MENNINGER: And for objections on redirect,  
10 including foundation.

11 THE COURT: Understood. Overruled.

12 A. That Epstein or Maxwell was the one that was responsible  
13 for canceling Maria's trip at the last minute.

14 Q. I want to direct your attention to a -- the last paragraph  
15 on that same page.

16 MS. POMERANTZ: Can we pull that up, Ms. Drescher.

17 Q. And do you recall when you were asked questions on  
18 cross-examination, Ms. Menninger read the sentences about  
19 horseback riding in this paragraph to you?

20 A. Yes.

21 (Continued on next page)

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A. Farmer - redirect

1 BY MS. POMERANTZ:

2 Q. Can you read the rest of the paragraph to yourself.

3 A. Yes.

4 Q. Does that refresh your recollection that you told the FBI  
5 in 2006 that Maxwell --

6 MS. MENNINGER: Objection. Leading, your Honor. And  
7 there was no denial of a recollection to refresh.

8 THE COURT: Sustained.

9 MS. POMERANTZ: Prior consistent statements.

10 THE COURT: You can ask the question. Leading.  
11 Sustained.

12 Q. What do you recall telling the FBI --

13 MS. POMERANTZ: Your Honor, may I have just one  
14 moment?

15 THE COURT: You may.

16 Q. Annie, did you tell the FBI about a foot massage in 2006?

17 A. I did.

18 Q. What did you tell the FBI about a foot massage?

19 A. That Maxwell showed me how to rub Epstein's feet and that,  
20 eventually --

21 MS. MENNINGER: Your Honor, I believe the witness is  
22 reading from a document.

23 THE COURT: We can take it down.

24 A. -- that I began doing that on my own after she had shown me  
25 how to do it.

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A. Farmer - redirect

1 MS. POMERANTZ: If we can bring up 3514-001 on page 3.  
2 Blow up the top paragraph.

3 MS. MENNINGER: Your Honor, I'm not sure what the  
4 witness is being shown the document for.

5 THE COURT: I'll allow it. I will see, but I presume  
6 prior consistent statements following impeachment of prior  
7 inconsistent statements.

8 MS. MENNINGER: Yes, your Honor. But either the  
9 witness recalls it from memory or needs to be refreshed, and  
10 that's the part that's not a matter of record in this  
11 procedure.

12 THE COURT: Fair enough. You'll ask the specific  
13 question and then we can take it from there.

14 You can take it down.

15 BY MS. POMERANTZ:

16 Q. Annie, do you recall what you told the FBI in 2006 about  
17 the massage that Maxwell had given you?

18 A. I recall the parts that I've described.

19 Q. Can you explain?

20 A. Yes. Again, that she had me lay on the table, that she was  
21 eager for me to experience the massage and asked me to, you  
22 know, lay on the table, to undress, to lay under the sheets,  
23 and then she began rubbing my body. Eventually, she pulled  
24 back the sheet --

25 MS. MENNINGER: Objection. Narrative, your Honor.

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A. Farmer - redirect

1 THE COURT: Overruled.

2 A. -- and rubbed my breasts, as I described.

3 Q. And you talked about your experience with Epstein and  
4 Maxwell in New Mexico. Did you include the details of your  
5 experience with Epstein and Maxwell in your submission to the  
6 Epstein Victim Compensation Fund?

7 A. Yes.

8 Q. Do you recall being asked questions on cross examination  
9 about your time in New Mexico?

10 A. Yes.

11 Q. Do you recall being asked questions about the movie that  
12 you saw in New Mexico?

13 A. Yes.

14 Q. What was that movie again?

15 A. Primal Fear.

16 Q. Why does that movie stand out in your memory?

17 A. In the movie, there's a priest that's sexually abusing --  
18 it's a theme around sexual abuse. So there is sexual  
19 misconduct on the screen with the actors.

20 Q. You were asked questions on cross examination about public  
21 interviews you gave. Do you remember that?

22 A. Yes.

23 Q. About how many interviews have you given publicly?

24 A. I think maybe four or five.

25 Q. And are your public interviews consistent or inconsistent

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A. Farmer - redirect

1 with what you have testified about here today?

2 MS. MENNINGER: Objection, your Honor.

3 THE COURT: Sustained.

4 Q. When you spoke publicly in interviews, did you tell the  
5 truth?

6 A. Yes.

7 Q. Was it important to tell the truth when you spoke publicly?

8 MS. MENNINGER: Objection, your Honor.

9 THE COURT: Sustained.

10 Q. Annie, have you coordinated your testimony with any other  
11 witnesses at this trial?

12 A. I have not.

13 Q. Has anyone ever told you what to say?

14 A. No.

15 Q. Have you conformed your testimony to anyone else?

16 A. No.

17 Q. What are you here to do today?

18 A. I'm here to be a part of hoping that Ghislaine Maxwell's  
19 held accountable for the harm that she's caused.

20 Q. You were asked questions about your claim to the Epstein  
21 Victim Compensation Fund. Do you recall that?

22 A. Yes.

23 Q. And to be clear, approximately when and what year did you  
24 submit your application to the Epstein Victim Compensation  
25 Fund?

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A. Farmer - redirect

1 A. In 2020.

2 Q. And just to take a step back, can you remind the jury, when  
3 was the first time that you spoke with the FBI?

4 A. 2006.

5 Q. And just to remind the jury, when you spoke with the FBI in  
6 2006, did you have a lawyer?

7 A. I did not.

8 Q. You were asked questions about the award that you received  
9 from the Epstein Victim Compensation Fund?

10 A. Yes.

11 Q. Can you tell the jury what the money means to you?

12 MS. MENNINGER: Objection. Relevance, your Honor.

13 THE COURT: Overruled.

14 A. It's a very significant chunk of money. It's a security  
15 for myself and my family, and it's already been helpful in  
16 providing that.

17 Q. To be clear, do you have a financial stake in the outcome  
18 of this trial?

19 A. I do not.

20 MS. MENNINGER: Objection. Asked and answered, your  
21 Honor.

22 THE COURT: Sustained.

23 MS. POMERANTZ: Your Honor, may I have just one  
24 moment, please?

25 THE COURT: You may.

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A. Farmer - redirect

1 BY MS. POMERANTZ:

2 Q. Annie, do you recall being asked questions on cross  
3 examination about your memory?

4 A. Yes.

5 Q. Do you remember Maxwell touching your breasts?

6 A. Yes.

7 Q. Do you need a journal entry or a piece of paper to remember  
8 Maxwell touching your breasts?

9 A. No.

10 MS. MENNINGER: Objection.

11 THE COURT: I'm sorry. There is an objection.

12 MS. POMERANTZ: Sorry, your Honor.

13 MS. MENNINGER: Leading to the last question.

14 THE COURT: I'll allow the question and then pause  
15 after the next one.

16 MS. POMERANTZ: Apologies, your Honor. I'm sorry. I  
17 just want to know which question I should back up to.

18 THE COURT: The question was, do you need a journal  
19 entry or a piece of paper.

20 BY MS. POMERANTZ:

21 Q. Annie, do you need a journal entry or a piece of paper to  
22 remember Maxwell touching your breasts during a massage?

23 A. No, I do not.

24 Q. Why does that stand out?

25 A. Because it was a very distressing event, and those are the



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A. Farmer - redirect

1 things that we remember.

2 Q. Can you explain to the jury --

3 MS. POMERANTZ: Withdrawn.

4 Q. Do you recall being asked about Jeffrey Epstein's penis  
5 several times on cross examination?

6 A. I do.

7 Q. In your own words, can you explain what Epstein did when he  
8 got into bed with you?

9 MS. MENNINGER: Objection, your Honor. Asked and  
10 answered. And I was not allowed to ask the question.

11 THE COURT: I believe the objection I sustained with  
12 you was the asked and answered question, wasn't it?

13 MS. MENNINGER: No, your Honor.

14 THE COURT: Give me a moment. Overruled.

15 BY MS. POMERANTZ:

16 Q. Annie, I believe the question I had asked was: In your own  
17 words, can you explain what Epstein did when he got into bed  
18 with you?

19 MS. MENNINGER: Objection. Calls for a narrative,  
20 your Honor.

21 THE COURT: I'll give her some room to lead, if you'd  
22 like. I don't know what the answer will be, so how can you --  
23 she can either lead or she can ask a non-leading question. So  
24 if it's --

25 MS. MENNINGER: It's a broad question. That's my

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A. Farmer - redirect

1 complaint.

2 THE COURT: Overruled.

3 A. When he crawled into bed with me, he put his arms around me  
4 and he pressed his body into mine and, you know, sort of -- he  
5 had rubbing up against me with his arms around my front.

6 Q. You testified about your experiences with Epstein and  
7 Maxwell, about them being sexualized experiences. Can you  
8 explain in your own words what you mean by that?

9 MS. MENNINGER: Objection, your Honor.

10 THE COURT: Overruled.

11 A. I think this was all a pattern of them working on confusing  
12 my boundaries, making me question myself about what was right  
13 and what was not right and with the ultimate goal of sexually  
14 abusing me.

15 MS. MENNINGER: Objection. 702, your Honor.

16 THE COURT: Overruled. Door opened. Overruled.

17 Q. Can you explain to the jury in your own words how you  
18 experienced Maxwell touching your breasts during the massage in  
19 New Mexico?

20 MS. MENNINGER: Objection. Misstates the witness's  
21 testimony.

22 THE COURT: Just a moment. Overruled.

23 A. I was very uncomfortable and fearful and wanted to get off  
24 of the table, that massage table, and wanted it to be over  
25 with.

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A. Farmer - redirect

1 MS. POMERANTZ: Your Honor, may I have just one  
2 moment, please.

3 THE COURT: You may.

4 MS. POMERANTZ: No further questions, your Honor.

5 THE COURT: Ms. Menninger.

6 MS. MENNINGER: No further questions, your Honor.  
7 Thank you.

8 THE COURT: Thank you. Ms. Farmer, you may step down.  
9 You are excused.

10 (Witness excused)

11 Government may call its next witness.

12 MS. POMERANTZ: The government calls David Mulligan.

13 THE COURT: David Mulligan may come forward.

14 MS. STERNHEIM: Judge, may we come forward just one  
15 moment?

16 THE COURT: Have Mr. Mulligan wait one moment until we  
17 come back.

18 (Continued on next page)

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