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1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

4 v.

20 CR 330 (AJN)

5 GHISLAINE MAXWELL,

6 Defendant.

Jury Trial

7 New York, N.Y.
November 30, 2021
8 8:50 a.m.

9 Before:

HON. ALISON J. NATHAN,

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

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16 HADDON MORGAN AND FOREMAN

Attorneys for Defendant

17 BY: JEFFREY S. PAGLIUCA

18 CHRISTIAN R. EVERDELL

LAURA A. MENNINGER

19 -and-

BOBBI C. STERNHEIM

20 -and-

RENATO STABILE

21 Also Present: Amanda Young, FBI

22 Paul Byrne, NYPD

Sunny Drescher,

23 Paralegal, U.S. Attorney's Office

Ann Lundberg,

24 Paralegal, Haddon Morgan and Foreman

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Jane - direct

1 MS. MOE: Thank you, your Honor.

2 The government calls Jane.

3 THE COURT: The witness testifying under the pseudonym
4 Jane may come forward.

5 JANE,

6 called as a witness by the Government,
7 having been duly sworn, testified as follows:

8 THE COURT: Please be seated.

9 This witness will be testifying under the pseudonym
10 Jane.

11 Ms. Moe, you may proceed.

12 MS. MOE: Thank you, your Honor.

13 And with respect to the Court's order regarding sketch
14 artists, is that now in effect?

15 THE COURT: It is in effect. I've asked the sketch
16 artist not to sketch the exact likeness -- ordered the sketch
17 artist not to depict the exact likeness.

18 And I will ask the witness to please remove your mask.
19 You are in the Plexiglas box with the HEPA filter. Thank you.

20 MS. MOE: Thank you, your Honor.

21 DIRECT EXAMINATION

22 BY MS. MOE:

23 Q. Good afternoon.

24 A. Good afternoon.

25 Q. Just to be clear, are you testifying under the name Jane

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Jane - direct

1 today?

2 A. Yes.

3 Q. Leading up to this trial, did you ask to testify under a
4 pseudonym to protect your privacy?

5 A. Yes.

6 Q. I'd ask you to please take a look in the binder in front of
7 you on the witness stand. If you could please turn to what's
8 marked for identification as Government Exhibit 12. Just let
9 me know when you are there please.

10 A. Here.

11 Q. Do you recognize that?

12 A. Yes, I do.

13 THE COURT: I just want to make sure that defense has
14 what they need.

15 MS. MENNINGER: I do. Thank you.

16 THE COURT: Okay. Thank you. Go ahead.

17 Q. What is Government Exhibit 12?

18 A. My birth certificate.

19 MS. MOE: At this time, your Honor, Government Exhibit
20 12 is in evidence under seal. I'd ask the jurors be permitted
21 to remove their juror binders and turn to Tab 12.

22 THE COURT: Without objection, Ms. Menninger?

23 MS. MENNINGER: No objection.

24 THE COURT: Okay. Jurors, you may open the binder and
25 look at what's been admitted as GX-12, please.

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1 MS. MOE: Thank you, your Honor.

2 BY MS. MOE:

3 Q. Directing your attention to the top left corner of
4 Government Exhibit 12, where it says "child's name." Do you
5 see that?

6 A. Yes.

7 Q. Without saying that out loud, is that your true name?

8 A. Yes.

9 Q. Is that your date of birth?

10 A. Yes, it is.

11 Q. Thank you. You can close the binder.

12 Now, Jane, I want to ask you, did there come a time in
13 your life when you met someone named Jeffrey Epstein?

14 A. Yes.

15 Q. What year was that?

16 A. 1994.

17 Q. Did there come a time in your life when you had sexual
18 contact with Jeffrey Epstein?

19 A. Yes.

20 Q. How old were you when that first happened?

21 A. Fourteen years old.

22 Q. Did that happen once or more than once when you were 14
23 years old?

24 A. More than once.

25 Q. Was there ever anyone else in the room with you when you

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Jane - direct

1 had sexual contact with Jeffrey Epstein when you were 14 years
2 old?

3 A. Yes.

4 Q. Who was most frequently in the room when you had sexual
5 contact with Jeffrey Epstein when you were 14 years old?

6 A. Ghislaine Maxwell.

7 Q. I'd like to ask you to take a moment to look around the
8 courtroom, and you can stand up if you need to if you can't
9 see. Do you see Ghislaine Maxwell in the courtroom today?

10 A. Yes.

11 Q. Can you please point to where she's sitting and indicate an
12 article of clothing that she's wearing.

13 A. Right there in the corner wearing a -- sort of a beige
14 turtleneck.

15 MS. MOE: Your Honor, may the record reflect that the
16 witness has identified the defendant?

17 THE COURT: It may so reflect.

18 Q. Now, I want to ask you more about that in a few moments,
19 but first I want to take a step back.

20 Directing your attention to 1993, where were you
21 living that year?

22 A. Palm Beach, Florida.

23 Q. How old were you in 1993?

24 A. Twelve, going on 13.

25 Q. I'd ask you to take a look at the binder in front of you.

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1 If you could please turn to what's been marked for
2 identification only as Government Exhibit 106.

3 Do you recognize that?

4 A. Yes.

5 Q. What is Government Exhibit 106?

6 A. That is a picture of myself.

7 Q. Approximately how old were you when that photograph was
8 taken?

9 A. Thirteen years old.

10 MS. MOE: Your Honor, the government offers Government
11 Exhibit 106 under seal.

12 MS. MENNINGER: No objection.

13 THE COURT: Government Exhibit 106 is admitted under
14 seal, consistent with my ruling, to protect the anonymity of
15 this testifying witness.

16 (Government's Exhibit 106 received in evidence)

17 MS. MOE: Thank you, your Honor.

18 May the jurors turn to Government Exhibit 106, please.

19 THE COURT: Jurors, you may pick up the binder and
20 please turn to GX-106.

21 BY MS. MOE:

22 Q. Who was living with you in your household in 1993 when you
23 were approximately 13 years old?

24 A. My mother and two of my brothers.

25 Q. What type of work did your father do?

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Jane - direct

1 A. He was a conductor and composer.

2 Q. Directing your attention to the fall of 1993, what happened
3 in your family at that time?

4 A. My father died of leukemia.

5 Q. What was your home life like after your father passed away?

6 A. It was not great. My father's employer had canceled his
7 health insurance without him knowing, and ended up in the
8 hospital and died very suddenly. And basically, my family went
9 into complete bankruptcy and lost everything, and we had to
10 move out of our home.

11 Q. You testified that before he passed away, your father was a
12 composer. Were you involved in the arts growing up?

13 A. Yes.

14 Q. Were your brothers involved in the arts?

15 A. Yes.

16 Q. Did you continue being involved in the arts after your
17 father passed away?

18 A. Yes.

19 Q. Directing your attention to the summer of 1994, what did
20 you do that summer?

21 A. Me and my two brothers, we went to camp for the first time,
22 Interlochen Arts Camp.

23 Q. What is Interlochen Arts Camp?

24 A. It's a camp for children with all kinds of artistic
25 abilities: Music, musical theater, theater, orchestra.

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- 1 Basically, what we used to joke about being band camp.
- 2 Q. And where is that located?
- 3 A. In Interlochen, Michigan, which is northern Michigan.
- 4 Q. Did anyone else go to camp with you that summer?
- 5 A. My two brothers.
- 6 Q. Given your family's financial circumstances at the time,
- 7 how were you and your brothers able to attend summer camp?
- 8 A. That first summer, my oldest sister and her husband and her
- 9 husband's family all pitched in to send us to camp.
- 10 Q. What grade in school had you just finished when you started
- 11 at summer camp that year?
- 12 A. Seventh grade.
- 13 Q. And when you arrived at camp that summer, how long had it
- 14 been since your father passed away?
- 15 A. So the end of October '93, so what is that, nine months?
- 16 Q. Did there come a time that summer at Interlochen Arts Camp
- 17 when you met a man and a woman?
- 18 A. Yes.
- 19 Q. Where were you when that happened?
- 20 A. I was in the main campus area where all the students hung
- 21 out during a break and where all the little cafes were and sort
- 22 of the gift shop. And I was on a park bench or a picnic bench
- 23 with my friends from camp. And we were eating ice cream.
- 24 Q. What do you remember happening next?
- 25 A. Well, we were sitting around and socializing. And we see

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Jane - direct

1 this tall thin woman approach us. Well, she was walking with a
2 cute little Yorkie. And the Yorkie came by us and we asked if
3 we could pet the dog.

4 Q. What happened then?

5 A. We started chitchatting, petted the dog. And the rest of
6 my classmates had to go to class. And probably about a minute
7 later, another man came and joined her.

8 Q. Once the man joined her, what happened next?

9 A. We continued chitchat, sort of talked to us. And the rest
10 of my friends, my classmates, left, and I was there by myself.
11 And I sat on the bench still eating my ice cream, and the man
12 sat across from me.

13 Q. Did you have a conversation with that man and that woman?

14 A. Yes, I did. He seemed very interested to know what I
15 thought about the camp, what my favorite classes were, what my
16 least favorite classes, teachers, whatnot, what the experience
17 was like. And proceeded to say that they were big benefactors
18 of this camp; and that they went there every summer; and that
19 they gave different kids scholarships. And so they wanted to
20 really know what a student attending the camp, what their
21 perspective was on it.

22 Q. What, if anything, else did you discuss with them?

23 A. Well, they asked me where I was from. And I said I lived
24 in Palm Beach, Florida. And the man said, What a coincidence,
25 we live there too. What are your parents' names?

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1 And I said, Well, my father just passed away. But my
2 mother's name is.

3 And he said, I think we know your mom. It's kind of a
4 smaller town. We definitely know her.

5 And I said, You know, my parents were sort of out on
6 the scene, and my father was a musician, and so that would make
7 sense.

8 And he had a newspaper under his arm. And then he put
9 the newspaper on the picnic table and said, Well, what's your
10 mom's name?

11 Gave my mom's name.

12 And he said, Well, what's her phone number?

13 And I just kind of went, Okay. He's asking me for a
14 number, so I gave it to him. And so I gave my mom's, which,
15 you know, at the time was just a landline.

16 Q. How did that conversation end?

17 A. It just sort of ended like, It was, you know, so nice to
18 meet you and I'm going to call your mom. That was it.

19 Q. That man and that woman that you had this conversation
20 with, who were they?

21 A. Jeffrey Epstein and Ghislaine Maxwell.

22 Q. What was your impression of them at that point?

23 A. They seemed very friendly. I thought they were a married
24 couple. They seemed inquisitive. And it made sense, I guess,
25 if they spent time there, that they wanted to know what the --

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Jane - direct

1 what the classes were like and what the campus was like.

2 Q. Did you return home to Palm Beach when summer camp was
3 over?

4 A. Yes.

5 Q. Where were you living at that point?

6 A. We were living in a pool house in one of my parents'
7 friend's backyards.

8 Q. Why were you living in a pool house?

9 THE COURT: I'm sorry, Ms. Moe, can you come a little
10 closer to the mic?

11 MS. MOE: Thank you, your Honor.

12 Q. Why were you living in a pool house at the time?

13 A. Because we lost our house and we were homeless.

14 Q. When you were staying there, did you have your own bedroom?

15 A. No.

16 Q. Where did you sleep?

17 A. I slept in a bed with my mom.

18 Q. After you returned home from summer camp in 1994, did you
19 ever hear from those two people that you met at camp?

20 A. Yes.

21 Q. When was the first time you heard from them?

22 A. Well, it was a few days after I had started school again.

23 Q. What grade were you in at that point?

24 A. Eighth grade.

25 Q. What school were you attending?

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Jane - direct

1 A. Palm Beach County School of the Arts.

2 Q. Is that a middle school or a high school?

3 A. Middle school.

4 Q. So what happened when you heard from them? What do you
5 remember about that?

6 A. I just remember coming home from school one day, and my mom
7 said, Someone you met at summer camp, someone from their office
8 called me.

9 And I said, Oh, well, I don't -- oh, that's right.
10 I -- I barely remember, because it seemed so long ago. It was
11 maybe four or five or six weeks, but, you know, being that
12 young, it seemed like an eternity. And I said, Yeah, I met --
13 and they said that they know you.

14 And my mom said, Well, we've been invited to his house
15 for some tea some afternoon.

16 Q. Did you end up going to his house for tea?

17 A. Yes.

18 Q. What do you recall about going over to the house for tea?

19 A. He sent somebody to come pick us up, like a chauffeur. And
20 we were driven to his house.

21 Q. What was your impression of the house when you first
22 arrived?

23 A. Well, it was enormous. It was not a pool house in the back
24 of someone's yard. It was this giant, like, beach-looking
25 house with a big white fence around it. And these giant gates

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Jane - direct

1 opened up, and the car pulled in. And it was just this, you
2 know, big beautiful house.

3 Q. Who, if anyone, went with you when you went over for this
4 tea?

5 A. My mother.

6 Q. What happened after you and your mother arrived at the
7 house?

8 A. Well, somebody opened the door for us and let us in the
9 house and escorted us through the house and to Jeffrey's
10 office, which was sort of like an open space.

11 Q. And after you got to the office, what happened next?

12 A. He was on the phone. He got off the phone, stood up, and
13 introduced himself to me and my mother, and then sort of let us
14 outside to the back patio, which had this great big dining
15 table. And there was a big spread of, like, pastries and
16 sandwiches and tea.

17 Q. What happened during the tea with you and your mother and
18 Jeffrey Epstein?

19 A. Well, he was very inquisitive and asked me questions about
20 what I was doing in school, what my interests were, what I
21 wanted to do with my life, and was asking us about our family,
22 asking my mother. It didn't last very long, I would say maybe
23 30 minutes in total.

24 But he proceeded to say, Well, I like to mentor young
25 students who are artists. And I love music, and I love dance,

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Jane - direct

1 and I gave all kinds of scholarships.

2 Q. How did that tea end?

3 A. It ended with him saying, Well, I am -- I'm very impressed
4 with your daughter and, you know, would love to see her sing
5 next time.

6 Q. After the day that you had this tea, did you ever see
7 Jeffrey Epstein again?

8 A. Yes.

9 Q. In the months after that tea, how frequently did you begin
10 seeing Jeffrey Epstein?

11 A. On average, once or -- once every week or two.

12 Q. We've been talking about a time period when you were 14 and
13 living in Palm Beach. How old were you when you moved away
14 from Palm Beach?

15 A. When I moved away? 17.

16 Q. I want to focus now first on the first few months that you
17 spent time with Jeffrey Epstein when you were 14. During those
18 first few months, when you spent time with Jeffrey Epstein in
19 Palm Beach, who was typically there with you?

20 A. At Jeffrey's house?

21 Q. Yes.

22 A. I was there by myself.

23 Q. And when you would spend time with Jeffrey Epstein at his
24 house in those first few months, who, if anyone, was there?

25 A. Ghislaine Maxwell.

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Jane - direct

1 Q. What was your understanding at the time of what the
2 relationship was between Ghislaine Maxwell and Jeffrey Epstein?

3 A. I didn't really understand. They never really shared that
4 information. I just assumed that they were married. And then
5 at a certain point I thought maybe they're best friends. And
6 then I thought, Well, maybe she works for him because he would
7 ask her to do things, make phone calls and things for him. So
8 I guess I was just confused.

9 Q. When you would see Epstein or Maxwell, how were those
10 meetings typically arranged?

11 A. It would be Ghislaine calling the house or Jeffrey's office
12 calling the house, like an assistant or something.

13 Q. Now, you mentioned earlier that you would go to these
14 meetings alone. Just to be clear, did your mother go with you
15 for these meetings?

16 A. No.

17 Q. Why not?

18 A. She wasn't invited.

19 Q. How would you typically get over to the house?

20 A. Jeffrey would send his chauffeur for me.

21 Q. Did you have your driver's license at the time?

22 A. No.

23 Q. Do you recall the driver who would pick you up?

24 A. Yes. I don't remember his name, but he was a sweet
25 Latin-American man. And I know his wife worked at the house as

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Jane - direct

1 well.

2 Q. When you began spending time with Maxwell and Epstein, what
3 was your impression at the time of how old they were?

4 A. I thought approximately the same age as my parents, my mom.

5 Q. And again, just to be very clear, how old were you when you
6 first started spending time with Maxwell and Epstein?

7 A. 14.

8 Q. What kind of activities would you typically do when you
9 spent time with Maxwell and Epstein during those first few
10 months?

11 A. We would spend time at the house and sort of chitchat
12 and -- or eat in the kitchen or hang out by the pool, sometimes
13 going to the movies. Casual stuff.

14 Q. What, if anything, do you remember about spending time at
15 the pool during those first few months?

16 A. Well, I remember maybe the first time I went to the
17 poolside. And I walked out there. And there was at least four
18 women and Ghislaine all topless, and some of them were naked.

19 Q. What was your reaction to that?

20 A. Well, I was just shocked because I hadn't seen that before.

21 Q. In those first few months when you spent time at the house
22 in Palm Beach, did you have conversations with Maxwell?

23 A. Yes.

24 Q. What kinds of things would she talk about with you?

25 A. Well, we would chitchat, talk about school. She would ask

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Jane - direct

1 me, you know, what I was up to, and ask me if I had any
2 boyfriend at school.

3 Q. During those first few months, as you were getting to know
4 her, how did Maxwell come across to you?

5 A. She seemed a little bit odd and quirky; but, you know, she
6 would kind of like tease me at times and -- but she was nice.

7 Q. How would you describe your relationship with Maxwell those
8 first few months when you started spending time with her?

9 A. In the first few months, I felt like I think she might have
10 said, I'm sort of like an older sister. Because I at least
11 thought that she was the same age difference maybe as my oldest
12 sister, but I wasn't sure.

13 Q. And at that time, approximately how old was your oldest
14 sister?

15 A. Twenty-seven. I'm not great at math. Sorry.

16 Q. Did there ever come a time when Epstein ever gave you any
17 gifts or money?

18 A. Yes.

19 Q. Approximately when did that first happen?

20 A. It happened probably a few visits in.

21 Q. What do you remember about the first time that that
22 happened?

23 A. I just remember that he said good-bye to me and was going
24 to lead me to the front door. And he put cash in my hand. And
25 I was a polite kid who didn't want to look. And I said, No,

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Jane - direct

1 it's okay.

2 And he said, No, no, no. It's okay. This is for your
3 mother. I know she's having a hard time, so it's not a big
4 deal.

5 Q. After that happened, did he ever give you any money again?

6 A. Yes.

7 Q. How often would that happen?

8 A. Almost every visit.

9 Q. Did there come a point where he began paying for things for
10 you?

11 A. Yes.

12 Q. What kinds of things did he help pay for?

13 A. He helped pay for some voice lessons, he bought me some
14 clothes, things for school.

15 Q. In your conversations with Maxwell, in that first few
16 months that you were spending time with her and with Epstein,
17 did you ever have any conversations with her about boyfriends?

18 A. Yes.

19 Q. What do you remember her telling you?

20 A. I just remember her telling me at one point when I said,
21 No, I don't have a boyfriend, she said, Well, remember when you
22 do, that once you fuck them, you can always fuck them again
23 because they're grandfathered in.

24 Q. What was your reaction to that when she told you that?

25 A. Well, I giggled because I didn't understand what

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Jane - direct

1 "grandfathered" meant, first and foremost.

2 Q. Did there ever come a time when you went shopping with
3 Maxwell and Epstein?

4 A. Yes.

5 Q. Approximately when was that?

6 A. Sometime at the end of 1994 or --

7 Q. Did they buy you anything?

8 A. Yes.

9 Q. What did they buy you?

10 A. They bought me some -- some pants and some shoes, like,
11 sort of loafers. I remember some shirts, like, sort of a
12 preppy button-up shirt, like a cashmere sweater.

13 Q. During that trip, did you go shopping for anything else
14 with them?

15 A. Yes, we went to a Victoria's Secret and bought some
16 underwear.

17 Q. What kind of underwear did they buy you?

18 A. It was sort of those, like, white cotton briefs; like, the
19 very sort of, I would say, basic-looking ones that you would,
20 sort of, wear when you're -- when you're younger.

21 Q. During this time in the first few months when you were
22 spending time with Maxwell and Epstein, did they ever tell you
23 anything about their social circle?

24 A. Yes. I mean, from the very beginning there was a lot of
25 bragging about how they were friends with essentially everyone,

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Jane - direct

1 and they knew everyone. And they would sort of name-drop or
2 sometimes put people on speakerphone whose voices I didn't know
3 and then say, Oh, well, this was so-and-so and so-and-so; and
4 just, you know, say that they were very well-connected and
5 affluent.

6 Q. How did that make you feel at the time?

7 A. I mean, I guess it made me feel slightly intimidated, but
8 it was overwhelming. And also I just -- I didn't know how I
9 was supposed to feel about it.

10 Q. What names do you recall them mentioning to you when they
11 would tell you about their social circle?

12 A. Donald Trump, Bill Clinton, Mike Wallace, people at some --
13 that I didn't know.

14 Q. I want to ask you now about the house in Palm Beach where
15 you were spending time with Maxwell and Epstein.

16 Could you please describe for the jury how that house
17 in Palm Beach was decorated.

18 A. It was -- I mean, it was a giant house, and so it had lots
19 of furniture, or at least in my opinion it was lots of
20 furniture, and lots of artwork and sculptures. And there was a
21 lot of, like, memorabilia and pictures, and pictures with
22 famous people and presidents and things like that.

23 Q. What do you remember about the pictures and artwork inside
24 the house in Palm Beach?

25 A. Well, not knowing much about art, I thought some of it was

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Jane - direct

1 maybe a little bit odd. You know, there were some paintings
2 of, like, naked women or half-naked women and, like, lots of
3 kind of -- or animals, like creepy looking animals.

4 Q. How did you feel when you were spending time inside that
5 house?

6 A. "Intimidated" I guess is the first word I think of.

7 Q. You testified earlier that there came a time when you had
8 sexual contact with Jeffrey Epstein. Again, approximately when
9 was that, the first time?

10 A. In 1994.

11 Q. And again, how old were you?

12 A. Fourteen.

13 Q. Where were you when that happened for the first time?

14 A. In Jeffrey's Palm Beach house.

15 Q. Can you describe for the jury what happened that day.

16 A. Well, Jeffrey was asking me, you know, You really need to
17 focus on what you want to do; you can't be broad. You know, do
18 you want to be an opera singer? Do you want to do theater? Do
19 you want to be an actress or model?

20 We just sort of discussed that.

21 He said, Well, you know, I know everybody. I know all
22 the agents. I know all the photographers. I know, you know,
23 the owner of Victoria's Secret. So I can make things happen,
24 but you just have to be ready for it.

25 Q. After he said that, what's the next thing that happened?

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Jane - direct

1 A. The conversation just sort of ended abruptly. It was in
2 his office. And he just took my hand and he said, Follow me.

3 Q. Where did he take you?

4 A. He took me outside in the backyard past the pool to the
5 pool house.

6 Q. Could you please describe for the jury what happened when
7 he took you inside the pool house.

8 A. He took me in the pool house. And on the right-hand side
9 was this couch, futon-looking thing. And he just proceeded to
10 pull me over. And he sat in the corner and he didn't say a
11 word. And he just pulled his pants down. He was wearing
12 sweatpants. And he pulled me on top of himself and he
13 proceeded to masturbate on me. And then he just -- he got up
14 and he went into the bathroom and, like, cleaned himself up,
15 and then acted like nothing happened.

16 Q. What was your reaction when he did that to you?

17 A. Well, I was frozen in fear. I'd never seen a penis before,
18 let alone not seen anything like this.

19 Q. Did you tell anyone that day about what happened to you?

20 A. No.

21 Q. Why not?

22 A. Because I was terrified and felt gross and I felt ashamed.

23 Q. After the incident that you just described, did you
24 continue spending time with Maxwell and Epstein in Palm Beach?

25 A. Yes.

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Jane - direct

1 Q. After that day that you just described, did there ever come
2 a time when you saw Ghislaine Maxwell without her clothes on?

3 A. Yes.

4 Q. Approximately when was that?

5 A. Shortly after the first incident.

6 Q. Could you please describe for the jury what happened that
7 day.

8 A. The three of us were just spending time together hanging
9 out and talking. And then all of a sudden, in that same
10 manner, just abruptly said, you know, Follow me. And we went
11 upstairs. I followed them up this -- felt like a winding
12 staircase, up into Jeffrey's bedroom.

13 Q. Once you got to the bedroom with Epstein and Maxwell that
14 day, could you please describe for the jury what happened next.

15 A. They moved me over to the bed and took their clothes off
16 and started to like sort of, like, fondle each other and sort
17 of, like, kind of casually giggling about it. And I was just
18 standing there.

19 And he asked me to take my top off. And then, you
20 know, sort of just there were hands everywhere. And Jeffrey
21 proceeded to masturbate again. And Ghislaine was like rubbing
22 on him and kissing on him and, you know, fondling. And then
23 that was it.

24 Q. After the incident that you just described, did your visits
25 to Epstein's house in Palm Beach include sexual contact?

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Jane - direct

1 A. Yes.

2 Q. And I just want to be clear about this. For the incident
3 that you just described when you were alone in a room with
4 Epstein and Maxwell, how old were you when that happened for
5 the first time?

6 A. Fourteen.

7 Q. After that day, did your visits to Epstein's house in Palm
8 Beach include sexual contact?

9 A. Yes.

10 Q. I'll ask you now about what happened during those
11 incidents. Were there times when you were alone with Epstein
12 and Maxwell when you were 14?

13 A. Yes.

14 Q. What kinds of things would happen when you were alone with
15 Epstein and Maxwell when you were 14?

16 A. I'm sorry, in what context?

17 Q. When you were 14 years old and there were times where you
18 were alone with Maxwell and Epstein, what kinds of sexual
19 contact would occur during those incidents?

20 A. It would be them leading me to a massage table and showing
21 me how Jeffrey likes to be massaged.

22 Q. Who would tell you how Jeffrey likes to be massaged?

23 A. Ghislaine and Jeffrey.

24 Q. How did he like to be massaged?

25 A. Like, he -- he liked -- like, very hard, like -- like,

LBUVMAX4

Jane - direct

1 rubbing his shoulders really hard, and like twisting his
2 nipples hard, and rubbing his feet hard and, like, his head.

3 Q. Where in the house would incidents like this typically
4 happen?

5 A. In a massage room that was off, like, the master bedroom.

6 Q. Did anyone ever give you instructions during incidents like
7 this in the massage room?

8 A. Yes.

9 Q. Who would give you instructions?

10 A. Ghislaine and Jeffrey.

11 Q. What kind of instructions would they give you?

12 A. Just showing me, you know, what he likes, what -- you know,
13 what men like, what women like, you know, sort of touching on
14 breasts and touching his penis.

15 Q. What was Maxwell's demeanor like during these incidents?

16 A. I would say that it seemed very casual, like it was -- like
17 it was very normal, like it was not a big deal.

18 Q. And when she behaved like that, how did that make you feel?

19 A. Well, it made me feel confused because that did not feel
20 normal to me; I'd never seen anything like this or felt any of
21 this, and it was very embarrassing. You know, it's all these
22 mixed emotions. When you're 14, you have no idea what's going
23 on.

24 Q. During these incidents that we've been discussing, did
25 Epstein touch your body?

LBUVMAX4

Jane - direct

- 1 A. Yes.
- 2 Q. Where did Epstein touch your body?
- 3 A. He would touch my breasts, he would touch my vagina.
- 4 Q. During these incidents we've been discussing when you were
5 14, did you touch Epstein's body?
- 6 A. Yes.
- 7 Q. Where did you touch his body?
- 8 A. Everywhere.
- 9 Q. When you were alone with Maxwell and Epstein when you were
10 14, did anyone ever use a sex toy?
- 11 A. Yes.
- 12 Q. I'm sorry to ask you this, but could you please describe
13 for the jury what would happen during those incidents.
- 14 A. He liked to, like, use, like, vibrators that were different
15 sizes; and even, like, those -- like -- like the back massagers
16 that were, like, really, you know, painful.
- 17 Q. During those incidents, what did Epstein do with that back
18 massager?
- 19 A. He would -- he would put it on my vagina even if I said
20 that it hurt.
- 21 Q. During these incidents, did Maxwell ever touch your body?
- 22 A. Yes.
- 23 Q. Where would she touch you?
- 24 A. I would say mainly my breast.
- 25 Q. Earlier, I believe you said that during these incidents,

LBUVMAX4

Jane - direct

1 you touched Epstein everywhere. Can you explain for the jury
2 what you meant by that.

3 A. I meant he -- he wanted to be massaged really from head to
4 toe. He liked his head rubbed, his shoulders, he liked his
5 nipples squeezed, his feet and his penis.

6 Q. Approximately how often did incidents like this occur when
7 you were 14 years old?

8 A. Approximately every visit to his house.

9 Q. Were there ever sexual interactions with Maxwell and
10 Epstein when other people were present as well?

11 A. Yes.

12 Q. Approximately how old were you when that happened for the
13 first time?

14 A. Fourteen or 15.

15 Q. Where would those incidents typically take place?

16 A. In one of Jeffrey's houses.

17 Q. Were there times where you traveled to other houses that
18 Epstein owned?

19 A. Yes.

20 Q. I want to talk with you about that in a few minutes. The
21 incidents you've been describing where other people were
22 present, how would they typically start?

23 A. I'm sorry, can you --

24 Q. Of course.

25 When there were incidents between you and Maxwell when

LBUVMAX4

Jane - direct

1 other people were present, how did incidents like that
2 typically start?

3 A. It would be other people spending time at the house, sort
4 of hanging out, seemingly casually. And then it was, once
5 again, sort of, it seemed just abruptly everything would stop.
6 And someone, Ghislaine or Jeffrey, would sort of summon
7 everyone to, you know, follow to a room.

8 Q. Where would everyone go?

9 A. To either Jeffrey's bedroom or mainly the massage room.

10 Q. During these incidents where other people were present,
11 what would Maxwell typically do?

12 A. Well, she, along with others, would just start taking their
13 clothes off. And Jeffrey would get on the massage table, and
14 it would just, you know, sort of turn into this orgy.

15 Q. What, if anything -- what, if any, clothing did you wear
16 during these sessions?

17 A. My underwear.

18 Q. During incidents like this where other people were present,
19 what kinds of sex acts would occur?

20 A. Kissing, oral sex on each other, oral sex on Jeffrey,
21 full-on intercourse.

22 Q. How often was Maxwell present in the first year that that
23 happened to you?

24 A. I can't give an exact number.

25 Q. Were there times where there were incidents like this where

LBUVMAX4

Jane - direct

1 she was not present?

2 A. Yes.

3 Q. Approximately how often would she be present during these
4 incidents?

5 A. I'm sorry, can you explain that?

6 Q. If there were times when she was present and times when she
7 wasn't present, approximately how often would she be present
8 for group sessions like this?

9 A. I don't know.

10 Q. During these incidents where other people were present,
11 were there ever sex toys that were used?

12 A. Yes.

13 Q. What do you remember about that?

14 A. I mean, it was pretty much the same thing: Using vibrators
15 on girls' vaginas.

16 Q. The other people who were in the room during incidents like
17 this, what was their gender?

18 A. Female.

19 Q. Approximately how old were they?

20 A. Older than myself, but I don't know.

21 Q. During these incidents when other people were present, were
22 there any -- were there any particular acts that Epstein
23 particularly liked or requested?

24 A. Sorry. When other people were present?

25 Q. Yes.

LBUVMAX4

Jane - direct

1 A. I don't know if there's anything he particularly liked. I
2 saw different acts, but --

3 Q. Again, to be clear, where in the house would incidents like
4 this typically happen?

5 A. The massage room.

6 Q. Could you please describe that room for the jury.

7 A. In which house?

8 Q. In the Palm Beach house.

9 A. Oh.

10 Q. Sorry.

11 A. It was -- it looked like maybe it was light, because it was
12 off the master bathroom, which was sort of -- it had like a
13 beachy feel.

14 Q. What was in the room?

15 A. I don't think I saw anything past the massage table.

16 Q. Did anyone ever call the incidents that you've just
17 described a massage?

18 A. Yes.

19 Q. Who would call it that?

20 A. Jeffrey.

21 Q. Did incidents like this continue when you were 16?

22 A. Yes.

23 Q. How frequently did these incidents occur between when you
24 were 14 and when you were 16?

25 A. The number or --

LBUVMAX4

Jane - direct

1 Q. How often would it happen during those years?

2 A. It would happen almost every visit with him, which would
3 have been every two weeks.

4 MS. MOE: Your Honor, if I could just have one moment.

5 THE COURT: Yes.

6 (Counsel conferred)

7 MS. MOE: Thank you, your Honor.

8 BY MS. MOE:

9 Q. Earlier, you were describing an incident when Maxwell was
10 in the room when you were 14. Just to be clear, during the
11 incidents you've been describing to the jury when you were 14,
12 was Maxwell in the room?

13 A. Yes.

14 Q. And when these incidents would occur when you were 14, was
15 Maxwell in the room?

16 A. At times.

17 Q. And when you were 16, were there times when Maxwell was in
18 the room?

19 A. Yes.

20 Q. Did there ever come a time when you traveled with Jeffrey
21 Epstein or Ghislaine Maxwell?

22 A. Yes.

23 Q. Approximately when did you begin traveling with them?

24 A. At 14 years old.

25 Q. About when did you last travel with them?

LBUVMAX4

Jane - direct

1 A. In March of 2001.

2 Q. I want to focus now on the years when you were 14, 15, and
3 16. About how many times did you travel with them during those
4 years?

5 A. Maybe ten times.

6 Q. Where did you travel with them when you were 14, 15, and
7 16?

8 A. From Palm Beach to New York City, and also Santa Fe, New
9 Mexico.

10 Q. When you traveled with them to those locations, how did you
11 get there?

12 A. Mainly on Jeffrey's private plane.

13 Q. Did you ever get there another way?

14 A. Yes.

15 Q. And how was that?

16 A. Commercial flights.

17 Q. When you flew in the private jet, did Maxwell ever go with
18 you?

19 A. Yes.

20 Q. How would these trips typically be arranged?

21 A. They would be arranged by Jeffrey's office.

22 Q. Where did you typically stay when you traveled with Maxwell
23 and Epstein?

24 A. At Epstein's house.

25 Q. Did Maxwell ever assist you in making travel arrangements?

LBUVMAX4

Jane - direct

1 A. Yes.

2 Q. I want to talk about some of the locations that you just
3 mentioned. Did some of those trips include travel to New York?

4 A. Yes.

5 Q. Where did you stay when you traveled with Maxwell and
6 Epstein to New York?

7 A. Epstein's house.

8 Q. Where was that house located?

9 A. New York City.

10 Q. In what borough?

11 A. Do you need the exact address?

12 Q. No, it's okay.

13 Approximately where was it within the city?

14 A. Upper East Side.

15 Q. Thank you.

16 Could you please describe for the jury what the house
17 on the Upper East Side looked like.

18 A. Well, it looked more like a building than a house. It was
19 eight stories, his massive eight-story house building where you
20 walk through these giant doors and then there was, like,
21 another security door to go in. And it had an elevator and it
22 was eight stories.

23 Q. How was the house decorated on the inside?

24 A. It was -- it was very dark, I felt. You know, very,
25 very -- like an old building. Lots of stone, you know, old

LBUVMAX4

Jane - direct

1 wood, and lots of, like, fabric wallpaper, like red curtains,
2 lots of artwork, statues, paintings.

3 Q. When you spent time in the house, what, if anything, did
4 you notice about the artwork, the statues, and the paintings?

5 A. I thought some of it was a little creepy personally. There
6 was, you know, like, animals and giant, like, paintings that
7 looked kind of -- I don't know how you would -- how I would
8 describe it, but just felt uncomfortable.

9 Q. What made you feel uncomfortable about the paintings and
10 the artwork in the house?

11 A. It all sort of seemed like to have a dark theme, like it
12 was kind of, you know, intimidating and dark and, like, animal
13 heads and strange things.

14 Q. Did any of the artwork inside the house in New York contain
15 nudity?

16 A. Yeah.

17 Q. What did you notice about that?

18 A. Paintings of naked women and orgies and things like that.
19 It didn't seem very unusual at this point.

20 Q. When you would spend time inside that house in New York,
21 how did you feel when you were inside the house?

22 A. Intimidated. It wasn't a very warm place; you didn't feel
23 very, maybe, safe. I kind of felt like -- you always kind of
24 felt like someone is watching you. You didn't feel free to
25 roam around exactly.

LBUVMAX4

Jane - direct

1 Q. What rooms in the house did you spend time in when you
2 would stay in the house in New York?

3 A. What rooms would I spend time in? The room that I was
4 given, which was the guest room on the eighth floor, or
5 Jeffrey's bedroom, his bathroom, the massage room, or his
6 office or the kitchen.

7 Q. Earlier, you described having sexual contact with Epstein
8 and Maxwell in Palm Beach. Did that ever happen when you
9 traveled with them?

10 A. Yes.

11 Q. Can you describe for the jury what kinds of sexual acts
12 would happen when you traveled to New York when you were 14,
13 15, and 16?

14 A. It was a lot of the same. If it wasn't an orgy in the
15 massage room, it was in Jeffrey's bedroom, and that would be
16 mostly me alone with him.

17 Q. What would happen when you were alone with him in the New
18 York house when you were 14, 15, and 16?

19 A. Well, he would get naked and get on his bed. And he would
20 pull me on top of him and ask me to take my clothes off.

21 Do you want me to describe in detail?

22 Q. I'm sorry to ask, but if you could explain for the jury
23 what would happen during these incidents.

24 A. So he would show me what he likes. And basically, he
25 would -- he would use vibrators on me, he would put his fingers

LBUVMAX4

Jane - direct

1 in my vagina, he would start to masturbate, and he would ask me
2 to straddle his face. He would ask me to, like, squeeze his
3 nipples really hard while he came.

4 Q. Did all of the things that you just described happen on
5 trips to New York when you were 14, 15, and 16?

6 A. Yes.

7 Q. You testified that you were mostly alone with him when
8 these incidents occurred in the New York house when you were
9 14, 15, and 16. Just to be clear, were there times when
10 Maxwell was present during those years?

11 A. Yes.

12 Q. Where would these incidents in New York typically happen
13 within the house?

14 A. In the massage room.

15 Q. Can you please describe for the jury what the massage room
16 in the New York house looked like.

17 A. Well, it was off the master bathroom, and it looked like it
18 was maybe supposed to be a giant walk-in closet. And it was
19 very dark. There was a built-in bookcase on the right-hand
20 side, and there was a stereo system. And there was, like,
21 music playing. And I don't know if it was painted dark, but --
22 or maybe that was the lighting, but it sort of had this, like,
23 red mood. And then there was just a giant black massage table
24 in the middle of it.

25 Q. Was there anything along the walls in the massage room?

LBUVMAX4

Jane - direct

1 A. My eyes didn't even look at the walls, mostly the floor, if
2 not what was going on.

3 Q. Was there any other furniture inside the massage room aside
4 from the massage table?

5 A. I don't know.

6 Q. Earlier you testified that you recall traveling to New
7 Mexico; is that correct?

8 A. Yes.

9 Q. Approximately when did you travel to New Mexico?

10 A. The year?

11 Q. Approximately how old were you when you traveled to New
12 Mexico?

13 A. Oh, 15 or 16.

14 Q. Who went with you on that trip?

15 A. Jeffrey and Ghislaine.

16 Q. Where did you spend most of your time on the trip to New
17 Mexico with Maxwell and Epstein?

18 A. At Epstein's house, which was a ranch.

19 Q. What do you remember about the ranch that you visited on
20 that trip?

21 A. I just remember that it was this giant ranch sort of in the
22 middle of nowhere. And it seemed very empty on the interior,
23 meaning there wasn't really any other people around.

24 Q. When you were at the ranch in New Mexico, where did you
25 spend most of your time?

LBUVMAX4

Jane - direct

1 A. In the guest bedroom that was assigned to me.

2 Q. Were you by yourself in the bedroom?

3 A. Yes.

4 Q. And did you spend most of your time alone in that bedroom
5 when you were in New Mexico?

6 A. Yes.

7 (Continued on next page)

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LBUCmax5

Jane - direct

1 Q. On that trip in New Mexico, was there ever a time when
2 someone came into your room?

3 A. Yes.

4 Q. Can you describe to the jury what you remember about that?

5 A. I just remember someone, at one point, just came into the
6 room and said Jeffrey wants to see you and then escorted me to
7 see him.

8 Q. When that person came into your room and told you that he
9 wanted to see you, how did you feel?

10 A. I just, as usual, felt, like, my heart sink into my
11 stomach, you know.

12 Q. And why was your heart sinking into your stomach?

13 A. Because I did not want to go see him.

14 Q. What's the next thing you remember about that?

15 A. I just remember being led to his bedroom and, you know, the
16 same thing would happen.

17 Q. Who was the person who came into your room to tell you that
18 Epstein wanted to see you?

19 A. I don't know.

20 Q. During that trip to New Mexico, was your bedroom in the
21 same building as Epstein and Maxwell's bedrooms?

22 A. Yes.

23 Q. When you traveled with Epstein and Maxwell, was there ever
24 a time when you had trouble getting on a flight?

25 A. Yes.

LBUCmax5

Jane - direct

1 Q. Can you describe to the jury what happened.

2 A. Well, I had traveled with them and I had to fly back to
3 Palm Beach to go to school on a Monday, and I traveled with
4 them on a private jet. Then, to get back, I was taking a
5 commercial flight, but I was only 15, so I didn't have a
6 driver's license or any ID, I didn't have a learner's permit
7 yet. So I had no ID to get on the airplane.

8 Q. What happened next after you couldn't get on the airplane?

9 A. I remember calling and freaking out, saying how am I going
10 to get on this plane. And Ghislaine made it happen for me.
11 She sort of called somebody and helped me get on that flight.

12 Q. Approximately how old were you when that happened?

13 A. I was 15.

14 Q. Earlier, you testified that Maxwell assisted with your
15 travel arrangements on these trips when you were 14, 15, and
16 16. Could you explain to the jury how Maxwell assisted with
17 your travel during these trips?

18 A. Well, sometimes it would be -- Jeffrey would ask her, hey,
19 can you get -- not Jane, you know, tickets and the times and
20 whatnot and make the arrangements to be picked up.

21 Q. You testified that this began when you were 14. Can you
22 explain to the jury how old you were when you moved away from
23 Palm Beach?

24 A. 17.

25 Q. Can you describe for the jury what you looked like when you

LBUCmax5

Jane - direct

1 were ages 14, 15, 16, and 17.

2 A. What I looked like?

3 Q. Can you describe what your physical appearance was like.

4 A. Oh, I was -- I was kind of short. I was very thin. I was
5 flat-chested until I was almost 16.

6 Q. If you could please take a look at the binder in front of
7 you on the witness stand. I'd ask you to just turn to what's
8 been marked for identification as Government Exhibit 107.

9 Do you recognize that?

10 A. Yes.

11 Q. What is Government Exhibit 107?

12 A. That is a picture of myself at 15 years old when I thought
13 it was a really good idea to bleach my own hair at home, which
14 was not a good idea.

15 MS. MOE: Your Honor, the government offers Government
16 Exhibit 107 under seal.

17 THE COURT: Government Exhibit 107 is admitted under
18 seal consistent with my ruling allowing this witness to testify
19 under a pseudonym to protect her privacy.

20 (Government's Exhibit 107 received in evidence)

21 MS. MOE: Thank you, your Honor.

22 Q. Jane, if you could please take a look at the binder in
23 front of you and turn to what's been marked for identification
24 as Government Exhibit 108.

25 Do you recognize that?

LBUCmax5

Jane - direct

1 A. Yes.

2 Q. What is Government Exhibit 108?

3 A. That's a picture of me.

4 Q. Approximately, how old were you when that picture was
5 taken?

6 A. 17.

7 MS. MOE: Your Honor, the government offers Government
8 Exhibit 108 under seal.

9 MS. MENNINGER: No objection.

10 THE COURT: Thank you. Government Exhibit 108 is
11 admitted under seal consistent with my ruling, allowing this
12 witness to testify using a pseudonym.

13 (Government's Exhibit 108 received in evidence)

14 MS. MOE: Thank you, your Honor. May the jurors turn
15 to Government Exhibits 107 and 108 in their binders.

16 THE COURT: Yes, please. Pick up your binders and
17 look at GX107 and GX108.

18 MS. MOE: Thank you. Just give the jurors a moment to
19 turn to that.

20 BY MS. MOE:

21 Q. So again, just to be clear, now that we're all looking at
22 Government Exhibit 107, approximately how old were you when
23 that photograph was taken?

24 A. 15.

25 Q. Turning to Government Exhibit 108, approximately how old

LBUCmax5

Jane - direct

1 were you when that photograph was taken?

2 A. 17.

3 Q. I want to step back and ask you a little bit about your
4 home life during the years we've been talking about. When you
5 were 14 to 17 and living in Florida, can you describe for the
6 jury what your home life was like during those years?

7 A. Well, it was -- it was not great. My father had just
8 passed away, sort of suddenly, and we found ourselves losing
9 our home and moving into a pool house and not being allowed to
10 grieve the loss of my father and having a very depressed mom at
11 home.

12 Q. I think you mentioned that you felt like you weren't
13 allowed to grieve your father. Can you explain to the jury
14 what you meant by that?

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

16 THE COURT: Overruled. You may answer.

17 A. Well, I grew up with a mother who didn't allow us to talk
18 about our feelings because that was a sign of weakness. So
19 grieving would be a part of that because she was very concerned
20 about appearance and what we would look like and that you
21 always sort of put a pretty face on. So we really didn't
22 discuss those kinds of things at home and weren't allowed to
23 discuss it with anyone else. So, being a kid and losing your
24 dad and not being allowed to talk about it, not having anyone
25 to talk to about it, it was really difficult.

LBUCmax5

Jane - direct

1 Q. During the years that we've been talking about, did your
2 mother know that you were spending time with Epstein and
3 Maxwell?

4 A. Yes.

5 Q. Would you ever talk with her about that?

6 A. Not in detail, but, you know, my mom was so enamored with
7 the idea that these wealthy affluent people took an interest in
8 me.

9 MS. MENNINGER: Objection. Hearsay, your Honor.
10 We've strayed into hearsay.

11 THE COURT: Just one moment, please. Overruled with
12 respect to the answer that's been given, but is that the end of
13 the question line, Ms. Moe?

14 MS. MOE: Your Honor, this testimony is offered for
15 the effect on the listener. We ask that the witness be able to
16 explain what is going on during this time period and how that
17 affected her.

18 THE COURT: You may ask that question.

19 MS. MOE: Thank you, your Honor.

20 BY MS. MOE:

21 Q. During the time period that we've been talking about when
22 you were 14, 15, and 16, did your mother ever talk to you about
23 Jeffrey Epstein and Ghislaine Maxwell?

24 A. The most that she would talk to me about was saying that I
25 need to be --

LBUCmax5

Jane - direct

1 MS. MENNINGER: Objection. Hearsay, your Honor. That
2 was a different question.

3 THE COURT: I'll sustain. If you reframe the question
4 to elicit the information you indicated as opposed to asking
5 what her mother said, you may proceed.

6 MS. MOE: Your Honor, if I could just have one moment?

7 THE COURT: You may.

8 MS. MOE: Your Honor, could we briefly approach?

9 THE COURT: Why don't we take our midafternoon break,
10 because the jurors' snacks are here and it's time for that. So
11 we'll take an approximately 10-minute break, members of the
12 jury. Thank you. See you in about 10 minutes.

13 (Continued on next page)

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LBUCmax5

Jane - direct

1 (Jury not present)

2 (Witness excused)

3 THE COURT: Everyone may be seated. Go ahead,
4 Ms. Moe.

5 MS. MOE: Thank you, your Honor, I'd like to ask the
6 witness about her conversations with her mother during this
7 time period about Epstein and Maxwell. As I think the witness
8 began explaining during this time period, her mother would tell
9 her about how great they were, how enamored she was with them,
10 and that I expect she would say that that had an effect on her.
11 None of that is offered for the truth, but for the effect on
12 the listener.

13 I think the defense has put at issue in this case why
14 the victims continued seeing the defendant and Epstein and why
15 they didn't tell about what happened to them later, and the
16 circumstances under which all of this was happening, including
17 her home life, the effect of her own mother and how her mother
18 would talk about Maxwell and Epstein are all part of that and
19 it's directly responsive to that issue.

20 THE COURT: The initial questions that you're asking,
21 you expect the witness to say what exactly was communicated to
22 the witness by her mother?

23 MS. MOE: Yes, your Honor. I expect the witness to
24 testify that her mother encouraged the relationship and would
25 often talk about them favorably and tell them she should be

1 grateful for everything they were doing for her.

2 THE COURT: And you're not seeking to offer that
3 information for the truth, but for the effect that it had on
4 the witness?

5 MS. MOE: Yes, your Honor.

6 THE COURT: So you'll accept a limiting instruction?

7 MS. MOE: Of course, your Honor.

8 THE COURT: Ms. Menninger.

9 MS. MENNINGER: Your Honor, I think the simple way to
10 ask the question is, how did you feel, and if it was based on
11 something your mother said to you, without getting into the
12 content of what the mother had communicated to her. I think
13 it's a real issue that may come up later with things that the
14 mother has said to any number of people, and I feel like this
15 opens the door to many other conversations that relate to the
16 mother.

17 So I'm not sure that just asking -- giving a bunch of
18 hearsay from the mom, saying we're asking it for the effect on
19 the listener and precluding cross examination about other
20 conversations with the mom would be appropriate.

21 THE COURT: So I don't know what you have in mind
22 coming down the road. I think it's proffered by the government
23 at this point anyway. I think there might be a way to
24 streamline it. Ms. Moe, maybe you could think about that.

25 But as proffered by the government, it's not being

1 offered for the truth, it's being offered for the effect on the
2 listener. I would give the jury a limiting instruction that
3 the witness's testimony regarding what her mother said is not
4 being offered for the truth of those statements, but for the
5 impact or effect that it had on the witness. We'll keep it
6 limited, Ms. Moe, as to eliciting statements for an
7 out-of-court witness, but with that caveat.

8 And then tell me, Ms. Menninger, what your concern
9 down the road was so I have it in my head.

10 MS. MENNINGER: Your Honor, if you're admitting it
11 with that limiting instruction, I think we'll take up the
12 issues with other statements by the mom when they come up.

13 THE COURT: Okay.

14 MS. MOE: Thank you, your Honor. Just to preview in
15 order to streamline things because we're on the subject, I
16 expect the next few questions to be about the issue of
17 disclosure. In particular, I expect to ask the witness whether
18 there was ever a time when she talked to a guidance counselor
19 when she was a kid and whether she came to learn that her
20 mother had found out that she talked to the guidance counselor,
21 and I want to talk to her about how her mother reacted to that
22 and told her that she should never talk about what goes on in
23 their house.

24 We're offering that, again, not for the truth of
25 anything, it's certainly not our position that she shouldn't

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Jane - direct

1 have told someone that that is a true statement. It's offered
2 to show the environment in which she was living and how that
3 affected her and affected her decision not to disclose what was
4 going on with her.

5 THE COURT: But in particular, you want the witness to
6 testify that her mother told her not to report what happened,
7 not to tell anyone what happened. Did I get that right?

8 MS. MOE: Yes, your Honor. I expect that she'll
9 testify that she spoke with a guidance counselor after her
10 father passed away, that her mother found out that she had
11 spoken with a guidance counselor and had a very strong negative
12 reaction to that, and told her that she shouldn't be talking
13 about personal family matters and shouldn't be talking about
14 what happens in their household.

15 THE COURT: Ms. Menninger.

16 MS. MENNINGER: I have no objection to that, your
17 Honor.

18 MS. MOE: Thank you, your Honor.

19 THE COURT: Thank you for previewing it.

20 Anything else to take up?

21 MS. MOE: Not from the government, your Honor.

22 THE COURT: Ms. Menninger?

23 MS. MENNINGER: No, your Honor. Not now.

24 THE COURT: We'll take a short break. Thank you.

25 (Recess)

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Jane - direct

1 THE COURT: Nothing to take up; correct?

2 MS. MOE: Correct, your Honor.

3 MS. MENNINGER: Correct, your Honor.

4 THE COURT: We'll bring in the jury.

5 (Continued on next page)

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Jane - direct

1 (Jury present)

2 THE COURT: Thank you, everyone. Ms. Moe, you may
3 continue with your direct examination of the witness.

4 MS. MOE: Thank you, your Honor.

5 BY MS. MOE:

6 Q. Before the break, we were talking about your interactions
7 with your mother during this time period when you were 14, 15,
8 and 16. I want to ask you, during that time period, did you
9 ever talk with your mother about Jeffrey Epstein or Ghislaine
10 Maxwell?

11 A. Yes.

12 Q. What kinds of things would she say to you about Maxwell and
13 Epstein?

14 THE COURT: I'm going to give the limiting instruction
15 now.

16 Members of the jury, the witness may provide some
17 testimony regarding things that her mother said to her. I
18 instruct you that that testimony is not being offered for the
19 truth of the matter of what was said, but instead for the
20 purposes of its impact on the listener of this witness.

21 You may proceed.

22 MS. MOE: Thank you, your Honor.

23 Q. Would it be helpful if I ask the question again?

24 A. Yes, please.

25 Q. Sorry about that. During this time period that we've been

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Jane - direct

1 talking about when you were 14 and 15 and 16, did you ever talk
2 with your mother about Jeffrey Epstein and Ghislaine Maxwell?

3 A. Yes.

4 Q. What kinds of things would she say to you about Epstein and
5 Maxwell during that time period.

6 A. What would she say? I'm sorry. I'm not really
7 understanding your question.

8 Q. Of course. When would you talk to your mother during those
9 years about Maxwell and Epstein, what, if anything, would she
10 say to you about her impressions of them?

11 A. My mother seemed very impressed and enamored with the sort
12 of the wealth, the affluence. She thought they seemed very
13 generous and they must think I'm special and that I should be
14 grateful for the attention that I received.

15 Q. During this time period, did you ever tell your mother
16 about the sexual abuse that you were experiencing when were you
17 at Epstein's house?

18 A. No.

19 Q. Why didn't you tell your mother during those years?

20 A. Because I felt very ashamed, I felt very disgusted, I was
21 confused, I didn't know if it was my fault, and my mother and I
22 did not have that kind of a relationship. We didn't talk about
23 our feelings. We weren't allowed to. I was raised in a
24 household where you were sort of spoken to, and you don't speak
25 unless you're spoken to, and I would be afraid that I would be

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Jane - direct

1 in trouble if I said something.

2 Q. During those same years, did you tell your brothers or any
3 of your friends that you were being sexually abused by Maxwell
4 and Epstein?

5 A. No.

6 Q. And why not?

7 A. Because how do you tell or describe any of this to any one
8 of your peers or your siblings when all you feel is shame and
9 disgust and confusion and you don't even know how you ended up
10 there.

11 Q. Were there ever times when you were 14 or 15 and 16, while
12 all of this was happening, where you thought about hurting
13 yourself?

14 A. Yeah.

15 Q. Can you explain to the jury what that was like for you?

16 A. Well, it was a multitude of things, of my father dying and
17 losing our home and then having a manic depressed mother who
18 didn't know how to cope and know how to take care of us and,
19 you know, just kind of feeling like it was hopeless, I guess.
20 It didn't seem like there was a lot of joy to look forward to
21 and it was just -- it was all -- it was very painful. It was
22 all very difficult.

23 Q. Did there come a time when you were a kid when you spoke to
24 a school guidance counselor?

25 A. Yes.

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Jane - direct

1 Q. Approximately when was that?

2 A. In the 7th grade.

3 Q. How did you go to see the guidance counselor when you were
4 in the 7th grade?

5 A. Well, actually, she asked to speak to me. She called me in
6 her office and said -- asked me what was going on at home, if
7 we had been or I had been in grief counseling and how my mother
8 was doing. So I told her how I was feeling and how sad I was
9 and, you know, how unavailable my mother was and how
10 unsupportive and there was really no one for me to talk to. So
11 I spoke to her and she was -- she was lovely and she would --
12 when she would see me. She would say if you need a place to
13 go, just come to my office and sit there and we'll talk.

14 Q. After you spoke with the guidance counselor, did there come
15 a time when you learned that your mother had become aware about
16 the conversations you were having with the guidance counselor?

17 A. Yes. I came home from school one day and my mother said
18 that the guidance counselor had called her and had said that
19 she wanted to see her because she was very worried about me.
20 My mother proceeded to berate me and scream at me and slap me
21 and tell me how dare I talk about myself and our family and
22 that it was an embarrassment, and that you don't tell other
23 people about your feelings or what's going on at home.

24 Q. I want to pause here and ask a few questions about the
25 sexual abuse you described experiencing when you were 14 and

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Jane - direct

1 when you were 15 and when you were 16.

2 Just to be clear, were there times when that happened
3 when it was just you and Jeffrey Epstein?

4 A. Yes.

5 Q. Were there times when that happened when it was just you
6 and Epstein and Maxwell?

7 A. Yes.

8 Q. Were there times when that happened when it was you and
9 Epstein and Maxwell and other women?

10 A. Yes.

11 Q. All those three categories, what happened the most during
12 those years?

13 A. Me and Jeffrey.

14 Q. What was the next most frequent thing that happened?

15 A. The group situations.

16 Q. Approximately how many times during the years that you were
17 14 and 15 and 16 was Ghislaine Maxwell in the room while you
18 were being sexually abused by Jeffrey Epstein?

19 A. I don't know.

20 Q. Why is it hard to remember the specific number?

21 A. It's hard to remember because I was abused pretty much
22 every time that I would go over to his house and it all started
23 to seem the same after a while, whether it was just him or
24 there were other women involved or me and Jeffrey and
25 Ghislaine, it all started to seem the same after a while and

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Jane - direct

1 you just become numb to it.

2 Q. Is it fair to say that she was frequently in the room while
3 you were being sexually abused by Jeffrey Epstein when you were
4 14, 15, and 16?

5 MS. MENNINGER: Objection.

6 THE COURT: I'll sustain. Please rephrase.

7 Q. Was Maxwell in the room just once while you were being
8 sexually abused by Jeffrey Epstein?

9 A. No.

10 Q. Was it just twice?

11 A. No.

12 Q. Approximately how many times?

13 A. I don't know, but more than twice.

14 MS. MOE: Your Honor, just one moment, please.

15 THE COURT: Sure.

16 Q. I want to ask you about that third category that I asked
17 you about the incidents where it was you and Maxwell and
18 Epstein and other people who were in the room.

19 What was typically happening before incidents like
20 that would start?

21 A. It would typically be something very casual, like hanging
22 out by the pool or sitting around in a living room or in the
23 kitchen and just be, like, very seemingly casual hangouts.

24 Q. When you would spend time at Epstein's house in Palm Beach,
25 were there other women present in the house?

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Jane - direct

1 A. Yes.

2 Q. Would those women sometimes be involved in these
3 encounters?

4 A. Yes.

5 MS. MOE: Just one moment, your Honor.

6 THE COURT: Sure.

7 Q. How would you typically transition from hanging around the
8 house or hanging around the pool to the incidents that you've
9 described?

10 A. We were summoned to follow Jeffrey up into his bedroom or
11 massage room.

12 Q. Can I ask you to please look at the binder in front of you.
13 If you could please turn to what's been marked for
14 identification as Government Exhibit 245. Thank you.

15 Do you recognize that?

16 A. Yes.

17 Q. What is Government Exhibit 245?

18 A. It's two pictures of myself.

19 MS. MOE: Your Honor, the government offers Government
20 Exhibit 245 under seal.

21 MS. MENNINGER: No objection, your Honor.

22 THE COURT: Thank you. GX245 is admitted under seal
23 consistent with my ruling, allowing this witness to testify
24 using a pseudonym.

25 (Government's Exhibit 245 received in evidence)

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Jane - direct

1 MS. MOE: Thank you, your Honor. May the jurors turn
2 to Exhibit 245 in their binders?

3 THE COURT: Yes, please. You may pick up your binder
4 and turn to GX245.

5 BY MS. MOE:

6 Q. Looking at Government Exhibit 245, do you recognize those
7 two photographs?

8 A. Yes.

9 Q. Can you please describe to the jury what those two
10 photographs are?

11 A. Well, the large -- larger photograph in the back is a
12 modeling picture of me, approximately age 15. The one in the
13 front is like my first head shot at about 19.

14 Q. For the smaller picture in the corner, did you give a copy
15 of that photograph to Jeffrey Epstein?

16 A. I did.

17 Q. Did you write a note on that photograph?

18 A. I did.

19 Q. What did you write on the photograph?

20 A. Well, cringey enough, I wrote, thanks for rocking my world.

21 Q. Why did you write that?

22 A. Well, my mother made me send him a picture after I had
23 gotten my first big job, and that's when I had taken this
24 picture and, in fairness, I used to write really bad captions
25 for people when I would write -- sign a headshot. So that was

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Jane - direct

1 my attempt at being cool, I guess.

2 Q. I want to ask you, Jane, how did you feel at the time about
3 the attention that Epstein and Maxwell were paying to you when
4 you were in middle school and high school?

5 A. How did I feel about the attention?

6 Q. Yes.

7 A. Initially, I felt special. You know, I didn't -- I didn't
8 really have much support or attention at home, so he was
9 someone who was seemingly looking out for me and caring for me
10 is how it felt.

11 Q. Why was that important to you at the time, to feel cared
12 about?

13 A. Because I didn't have any family that made me feel cared
14 about.

15 Q. In your adult life, how has what happened to you with
16 Maxwell and Epstein affected your relationships?

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

18 THE COURT: Just a moment.

19 MS. MENNINGER: May we have a sidebar if there is
20 any --

21 THE COURT: Let's do that.

22 (Continued on next page)

23 (Pages 344 to 347 SEALED)

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Jane - direct

1 (In open court)

2 THE COURT: You may proceed, Ms. Moe.

3 MS. MOE: Thank you, your Honor.

4 BY MS. MOE:

5 Q. Let me back up and ask you a few questions. You testified
6 in the beginning Epstein and Maxwell made you feel special.

7 Can you explain to the jury what it is they did that made you
8 feel special when it first started?

9 A. Well, they made me feel special by spending time with me,
10 talking to me, asking me about my family, my interests, what I
11 was doing, what I was doing in school, what I wanted to do with
12 my life. They took me to the movies, they took me shopping,
13 and took me on field trips, I guess you could say.

14 Q. And to be clear, during this time, did Maxwell talk with
15 you about your school and your family and what was going on
16 with you and your life?

17 A. Yeah.

18 Q. You testified that you felt this way in the beginning. Did
19 there come a time when that changed?

20 A. Yes.

21 Q. Can you tell the jury about that.

22 A. Well, it changed when the abuse started happening.

23 Q. Can you explain for the jury how has what Maxwell and
24 Epstein did to you affected your relationships as an adult?

25 A. That's a loaded question. Sure you could ask a lot of

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Jane - direct

1 people their opinions on that. How do you navigate a healthy
2 relationship with a broken compass? I didn't even understand
3 what real love is supposed to look like. It ruined my
4 self-esteem, my selfworth, I don't know how men were supposed
5 to treat me and how I was supposed to reciprocate any of that.
6 It led me to not trust people and probably make bad decisions
7 in future boyfriends.

8 Q. Earlier, we were talking about the years that you lived in
9 Palm Beach and about the time when you moved away from Palm
10 Beach. Can you tell the jury, approximately when did you move
11 away from Palm Beach?

12 A. Approximately 17 years old.

13 Q. Did you go to school when you moved to New York City?

14 A. Yes.

15 Q. Where did you go to school?

16 A. Professional Children's School.

17 Q. When you moved to New York City when you were 17 to go to
18 the Professional Children's School, who paid for your tuition?

19 A. Jeffrey Epstein.

20 Q. About how old were you when you started school in New York
21 City?

22 A. I just turned 18.

23 Q. What year of school were you starting?

24 A. Senior year of high school.

25 Q. During your senior year of high school, did you spend time

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Jane - direct

1 with Jeffrey Epstein?

2 A. Yes.

3 Q. Did you spend time with Ghislaine Maxwell that year?

4 A. Yes.

5 Q. During that year when you were a senior in high school, did
6 you continue engaging in sexualized massages with Jeffrey
7 Epstein?

8 A. Yes.

9 Q. To be clear, did you want to keep doing that?

10 A. No.

11 Q. Did you graduate from school that year?

12 A. Yes.

13 Q. Did there come a time after you graduated when you moved
14 away from New York?

15 A. Yes.

16 Q. Approximately when was that?

17 A. October of 1999.

18 (Continued on next page)

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LBUVMAX6

Jane - direct

1 BY MS. MOE:

2 Q. Where did you go when you moved away from New York City in
3 October of '99?

4 A. Los Angeles, California.

5 Q. Why did you move to Los Angeles?

6 A. Because I got a job on a TV show.

7 Q. Jane, can you tell the jury what kind of work do you do
8 now?

9 A. I am grateful to still be a working actor.

10 Q. For how many years have you been employed as an actor?

11 A. Twenty-two years.

12 Q. After you moved to California, did you stay in touch with
13 Epstein and Maxwell?

14 A. Yes.

15 Q. For about how many years?

16 A. Until approximately the end of 2002.

17 Q. Approximately how old were you during that year?

18 A. Twenty-two.

19 Q. During the year that you were -- withdrawn.

20 After you moved away, did you continue to travel with
21 Maxwell and Epstein?

22 A. With Epstein for sure.

23 Q. When you traveled with Epstein in your early twenties, did
24 you travel in his private jet?

25 A. Yes.

LBUVMAX6

Jane - direct

1 Q. Did there come a time when you stopped being in touch with
2 Jeffrey Epstein?

3 A. Yes.

4 Q. Approximately when was that?

5 A. The end of 2002.

6 Q. And why did you stop seeing him at the end of 2002?

7 A. Because I fell madly in love with someone, and we got very
8 quickly engaged. And Jeffrey would call me. And my new fiancé
9 would ask, Who is this person who calls you and that you sort
10 of have to drop everything for to take that call?

11 And I said, Oh, it's -- that's my godfather.

12 And he just kind of said, Well, what do you mean your
13 godfather? You just tell him you'll call him back.

14 I said, No, it doesn't work that way.

15 And he had a pretty abrasive personality himself, this
16 guy. And he said, Well, don't call him back.

17 And that was sort of -- well, that wasn't the end of
18 it. I didn't call him back. And then he tried contacting me
19 again and leaving me voicemails that became increasingly
20 agitated in saying that I need to call him back, he was coming
21 into town to visit, and he wanted to see me, and that I need to
22 be grateful and remember what he's done for me. Because my
23 mother had still been living in an apartment in New York after
24 I moved away that he was paying for. And then I didn't return
25 his call.

LBUVMAX6

Jane - direct

1 And do you want me to continue?

2 Q. That's all right.

3 Was that the last contact you had with him?

4 A. Yes.

5 Q. I think you mentioned that the person you were dating at
6 that time you were engaged to. Did you end up marrying him?

7 A. No.

8 Q. Did there come a time in the late 2000s when you were in a
9 romantic relationship with someone else?

10 A. In the late 2000s? Yes.

11 Q. Approximately what years were you dating that man?

12 A. 2007 through 2013.

13 Q. For today's purposes, I'm going to refer to that man as
14 Matt. Will you do that?

15 A. Yes.

16 Q. While you were together, did you ever tell Matt that you'd
17 been sexually abused by Maxwell and Epstein?

18 A. Yes.

19 Q. Why did you tell him?

20 A. I told him because that was around the time that you
21 started seeing on the news that Epstein had been arrested and,
22 you know, you sort of would see his face everywhere and it
23 would make me very emotional. And my boyfriend at the time
24 would notice that and kind of wonder. And you know -- and then
25 there would be moments of vulnerability that I sort of started

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Jane - direct

1 to share, like, some of the things that had happened to me, not
2 in detail, but, you know, it took a long time to really share
3 any of that stuff with him.

4 Q. Directing your attention to September of 2019, were you
5 interviewed by the FBI that month?

6 A. Yes.

7 Q. Before that time, had you ever spoken with law enforcement
8 about Jeffrey Epstein or Ghislaine Maxwell?

9 A. What was the month you mentioned?

10 Q. Before you were interviewed by the FBI in September of
11 2019, had you ever spoken with law enforcement about what had
12 happened to you with Maxwell and Epstein?

13 A. I think that month is incorrect. I think it's --

14 Q. Approximately what month do you remember being interviewed
15 by the FBI?

16 A. May.

17 Q. Of what year?

18 A. Of 2019.

19 Q. Before that first interview, had you ever spoken with law
20 enforcement about what happened to you with Maxwell and
21 Epstein?

22 A. No.

23 Q. Did there come a time when you sued Ghislaine Maxwell?

24 A. Yes.

25 Q. Approximately when did you file that lawsuit?

LBUVMAX6

Jane - direct

1 A. Early 2020.

2 Q. To be clear, was that after you had told the government
3 what had happened to you?

4 A. Yes.

5 Q. At the time that you sued Ghislaine Maxwell, did you also
6 sue the Estate of Jeffrey Epstein at that same time?

7 A. Yes.

8 Q. Did you bring that lawsuit under a pseudonym to protect
9 your identity?

10 A. Yes.

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

13 A. Yes.

14 Q. What did you do as part of submitting a claim to that fund?

15 A. Well, I had to submit documents and speak to the people who
16 ran the fund.

17 Q. Did the fund award you money?

18 A. Yes.

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

20 A. \$5 million.

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

22 A. Yes.

23 Q. Did you receive all of that money?

24 A. No.

25 Q. And why not?

LBUVMAX6

Jane - direct

1 A. Because some of it has to go to counsel and litigation and
2 filing documents and such.

3 Q. How much did you ultimately receive?

4 A. Approximately 2.9 million.

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

6 A. Yes.

7 Q. As part of the settlement that you received from the fund,
8 were you required to dismiss your lawsuit against Maxwell and
9 the Estate of Jeffrey Epstein?

10 A. Yes.

11 Q. And did you dismiss the lawsuit against Maxwell after you
12 received an award from the fund?

13 A. Yes.

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

17 MS. MENNINGER: Objection, your Honor.

18 THE COURT: Just a moment.

19 I have to hear you.

20 (Continued on next page)

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LBUVMAX6

Jane - direct

1 (At sidebar)

2 THE COURT: The question is whether the jury's verdict
3 will affect what she receives from the victim compensation
4 fund?

5 MS. MENNINGER: Right. I think she has a lack of
6 personal knowledge about that, your Honor. It's a legal
7 conclusion, a legal question. She's not the right witness to
8 talk about that.

9 THE COURT: You want the jury -- you want to put in
10 front of the jury that the involvement in this case affects
11 payout from the legal compensation fund.

12 MS. MENNINGER: Well, your Honor, this is something
13 that we litigated, which is, any suggestion that the victim's
14 compensation fund was based on some kind of finding of validity
15 of her claims.

16 THE COURT: I agree with that. I don't see what that
17 has to do with this question.

18 MS. MENNINGER: I think she has told this story to the
19 victim compensation fund, they have given her money, and now if
20 she is found -- if our client was found not guilty, for
21 example, I don't know what the ramifications would be for a
22 fund who has determined --

23 THE COURT: Well, the question to be phrased is what
24 her understanding is. I mean, you have well put in issue the
25 question of whether this fund impacts her motivation to tell

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Jane - direct

1 the truth or not, which is precisely why I granted the Rule 17
2 subpoena and, I suspect, in the opening raised this issue
3 precisely. So whether it's true or not, the question is what
4 is her understanding. So if the question is phrased that way,
5 I will overrule the objection.

6 MS. MOE: Yes, your Honor. In fact, that is exactly
7 how I phrased that question for that reason.

8 MS. MENNINGER: I still think it's a legal conclusion,
9 your Honor, asking someone, you know, what is the effect of a
10 contract or what is -- how can a contract be dissolved. It's
11 just not within the ken of a person who is not --

12 THE COURT: I can give a limiting instruction that
13 testimony is not being offered for -- as a legal instruction,
14 but for the witness's understanding.

15 MS. MENNINGER: Sure. That would be better --

16 THE COURT: Any objection?

17 MS. MOE: No, your Honor.

18 I think this is very commonplace, it happens all the
19 time. For example, when cooperators testify about their
20 understanding of whether, for example, a verdict in a case
21 affects their cooperation agreement with the government, I
22 don't think there's a limiting instruction; because, again, the
23 question is about this person's understanding. I can make that
24 very clear when I ask the question. It's directly responsive
25 to defense arguments about whether this witness has a motive to

LBUVMAX6

Jane - direct

1 lie.

2 MS. MENNINGER: In cooperating situations, your Honor,
3 the sentence happens after the testimony.

4 THE COURT: Well, they are not the same, but I think
5 the point is the same.

6 I'll give a limiting instruction that -- after she
7 testifies, that the jury should understand she's not providing
8 legal instruction, but testifying as to her understanding in
9 response to the question. And so with that -- and you'll say
10 the question again, make sure it's phrased from her
11 understanding. With that, I'll overrule.

12 I don't see any reason this should be sealed.

13 MS. MOE: No, your Honor.

14 MS. MENNINGER: No, your Honor.

15 MS. MOE: Just to avoid a second sidebar, I just
16 wanted to flag, after asking this question, I expect the next
17 question I would ask would be just simply, Do you have a
18 financial stake in the outcome of this case? Again, that's
19 about her understanding, whether she believes she has a
20 financial -- which is exactly what the defense suggested in
21 their opening.

22 THE COURT: Oh, there's no doubt.

23 MS. MOE: I just want to flag that.

24 THE COURT: You have an objection to that question?

25 MS. MENNINGER: No, your Honor. But I think she does

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Jane - direct

1 have a financial stake --

2 THE COURT: That's what you argue to the jury.

3 MS. MENNINGER: Your Honor, one other thing. If she
4 did, in fact, give a statement to law enforcement in May of
5 2019, it hasn't been disclosed to us.

6 MS. MOE: Yes, your Honor. My understanding, I was at
7 that very first meeting. I can double-check my notes, which we
8 produced to the defense, it is September 2019.

9 THE COURT: Do you want to refresh her recollection on
10 the date or you don't have any notes from May 2019?

11 MS. MOE: I do not.

12 THE COURT: You're certainly welcome to inquire.

13 MS. MENNINGER: Certainly, your Honor. On her dates.

14 MS. MOE: I'm sorry. My colleague is -- again, I
15 don't remember this off the top of my head, but --

16 MS. COMEY: Your Honor, I believe what is possibly
17 happening in the witness's answer about May 2019 is that I
18 believe before the September 2019 interview, FBI agents
19 approached this witness and asked her if she was willing to be
20 interviewed. She declined. And I believe that may have
21 happened around May of 2019. So she may be confusing that as
22 the first time she ever spoke with the FBI. But she was not
23 substantively interviewed and did not give substantive
24 statements until September of 2019.

25 THE COURT: All right. Not sealed.

LBUVMAX6

Jane - direct

1 (In open court)

2 THE COURT: You may proceed, Ms. Moe.

3 MS. MOE: Thank you, your Honor.

4 BY MS. MOE:

5 Q. Jane, based on your understanding, will the jury's verdict
6 in this case affect the award that you received from the fund?

7 A. No.

8 THE COURT: I'll just instruct the jury the witness is
9 not providing legal instruction, but responding to the question
10 of her understanding.

11 MS. MOE: Thank you, your Honor.

12 Q. And just to be clear, do you have any financial stake in
13 the outcome of this trial?

14 A. No.

15 Q. Before this trial, have you ever publicly revealed your
16 identity as a victim of Jeffrey Epstein and Ghislaine Maxwell?

17 A. No.

18 Q. Do you want the public to know your true identity?

19 A. No.

20 Q. Why is it important to you to remain anonymous?

21 A. Because I've always just wanted to put this past me. I
22 moved on with my life. I am proud that I have my own career,
23 my own husband, my own children, and I work in the
24 entertainment industry. And victim shaming is still very
25 present to this day. And I was also afraid that it was going

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1 to affect my career if somebody looks at me and that's all they
2 see and that they won't hire me based on that. So I didn't
3 really want any part of it; I just wanted it to go away.

4 MS. MOE: Your Honor, if I could just have one moment.

5 THE COURT: You may.

6 (Counsel conferred)

7 MS. MOE: Nothing further, your Honor.

8 THE COURT: All right. Thank you.

9 Ms. Menninger, you may begin your cross-examination.

10 MS. MENNINGER: Your Honor, consistent with past
11 practice, I have a binder to provide to the witness in case
12 electronics don't work.

13 THE COURT: Okay. Ms. Moe?

14 MS. MOE: Yes, your Honor. So long as we are provided
15 a copy with the item before they are reviewed, we have no
16 objection.

17 THE COURT: Consistent with how we've been proceeding,
18 you will be. Thank you. You may approach.

19 MS. MENNINGER: May I take off my mask, your Honor?

20 THE COURT: Yes, you may.

21 (Pages 363 to 389 SEALED)

22 (Continued on next page)

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