

From: Sigrid McCawley [REDACTED]

To: [REDACTED]

Subject: FW: Ghislaine Maxwell Deposition Transcript in slip and fall case (readers digest version)

Date: Mon, 23 Mar 2020 21:28:16 +0000

Attachments: Maxwell_Dep._Tr._(Slip_and_Fall_Case).pdf

Inline-Images: image009.png; image022.png; image037.png; image064.png; image008.png; image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.jpg; image006.jpg; image007.jpg; image010.jpg; image011.jpg; image012.jpg; image013.jpg; image014.jpg; image015.jpg; image016.jpg; image017.jpg; image018.jpg; image019.jpg; image020.jpg; image021.jpg; image023.jpg

Hi [REDACTED] – my paralegal found this. Not sure if you have it so I wanted to pass it along. It's a 2019 depo of Maxwell in a slip and fall case in NYC. There are some clips below and the full version is attached.

Best,
Sigrid

Sigrid McCawley

Partner

BOIES SCHILLER FLEXNER LLP

Fort Lauderdale, FL, 33301

From: Sandra Perkins

Sent: Monday, March 23, 2020 5:13 PM

To: Sigrid McCawley [REDACTED]; Sabina Mariella [REDACTED]

Subject: Ghislaine Maxwell Deposition Transcript in slip and fall case (readers digest version)

Ghislaine Maxwell Deposition Transcript in slip and fall case (readers digest version)

Note the File # has an AIG PRIV prefix (this has to mean that AIG is her insurance carrier on this case).

CUOMO, LLC.

Attorney for Defendant

[REDACTED]
Mineola, New York 11501

BY: MATTHEW CUOMO, ESQ.

FILE NO.: AIGPRIV 17007

EFTA00011365

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
SHELDON BARR and THOMAS GARDNER,

Plaintiffs,

-against-

CITY OF NEW YORK and [REDACTED]

[REDACTED]

Defendants,

INDEX NO.: 159225/2010

[REDACTED]
New York, New York

April 9, 2019

10:07 a.m.

EXAMINATION BEFORE TRIAL of the Defendant,
[REDACTED] by GHISLAINE MAXWELL, in
the above-entitled action, held at the above time
and place, taken before a Notary Public of the State
of New York, pursuant to Order and Stipulations
[REDACTED]
between Counsel.

Q. What was your primary residence back in September of 2015?

A. [REDACTED]

Q. Can you tell me how much time you spent there, say, back in 2015 from January 1st through September 9, 2015?

A. A lot of time. I lived there. That's my primary residence.

Page 10 (Maxwell is a US Citizen as well as citizen of France and England)

Q. Where were you born?

A. Paris, France.

Q. What is your date of birth?

A. [REDACTED]

Q. Are you a U.S. Citizen at this time?

A. Yes.

Q. When did you become a U.S. Citizen?

A. I don't recall. But it was some time in late '90s, mid '90s. I'm not sure. I don't remember.

Q. Are you a citizen of any other country?

A. Yes.

Q. What other countries?

A. France and England.

Page 11 Education and Licenses

Q. Do you have any professional degrees or licenses?

A. I do.

Q. In what?

A. I'm a registered emergency technician, first responder, EMT. I'm a helicopter pilot.

Q. Sorry?

A. Helicopter pilot.

Q. Is your certification as an EMT in the United States or another country?

A. In the U.S.

Page 12 - Ellmax

10 Q. What is Ellmax?

11 A. It's no longer in existence.

12 Q. What was it?

13 A. It was a company I started to advise other
14 businesses on board placement, placing board of
15 directors, and any other questions they might have,
16 conferences, locations for conferences, speakers at
17 conferences.

18 Q. What is the primary business? Is it
19 Ellmax, LLC.?

20 A. I think so.

21 Q. Is that a Florida Limited Liability
22 Company?

23 A. Whatever paperwork I have. I don't recall.
24 Whatever it says on the paperwork.

Page 16 – [REDACTED] personal assistant for more than 10 years (beginning 2001 or 2002) and Maxwell paid [REDACTED] herself not through Ellmax.
(Proof of payments?)

GHISLAINE MAXWELL

Q. Who is [REDACTED]

A. [REDACTED] my personal assistant.

Q. How long was [REDACTED] your personal assistant?

A. More than ten years.

Q. More than ten years from today?

A. No. [REDACTED] doesn't work for me anymore.

Q. When did you start working for you?

A. Again, some time in 2001, 2002. Something like that.

Q. Was [REDACTED] your personal assistant for the next ten years?

A. Yeah.

Q. Was [REDACTED] paid by Ellmax, LLC.?

A. I paid [REDACTED] myself.

Q. Did you pay [REDACTED] out of a different company or different funds or what source?

A. I don't recall where I paid [REDACTED] from exactly. [REDACTED] was not an employee of -- I was the only person that did any work for Ellmax. [REDACTED] was my personal assistant. [REDACTED] was able -- [REDACTED] would do

9 Q. Was there a reason you chose a Florida
10 Limited Liability Company for Ellmax, LLC.?

11 A. I don't know why. I don't remember.

12 Q. Were you also a Florida resident back in
13 2016?

14 A. I lived in Florida at certain times since I
15 moved to the states.

16 Q. What is your address in Florida?

17 A. I lived in a number of different places in
18 Florida.

19 Q. Do you own real estate in Florida?

20 A. No.

21 Q. At any point did you maintain a residence
22 in Florida?

23 A. I've never owned a home in Florida.

24 Q. Did you rent the same residence in Florida?

25 A. No.

Page 23 (Communicated with her personal assistant via email, text or phone)

Where are the records?

1 GHISLAINE MAXWELL

2 Q. You said [REDACTED] was your personal assistant.

3 A. I did.

4 Q. Was that a remote job or did [REDACTED] live with
5 you or lived nearby?

6 A. [REDACTED] never lived in my home. I can't
7 recall. Wherever [REDACTED] lived I don't know. I'm
8 sorry.

9 Q. Was it a full-time or part-time job?

10 A. It was full-time.

11 Q. How would you communicate with [REDACTED]

12 A. Via, email, text, or phone.

[Page 25: Darren Indyke helped Maxwell create Ellmax](#)

1 GHISLAINE MAXWELL

2 Q. Was there ever any other members?

3 A. I don't believe so.

4 Q. Could you tell me who Darren Indyke, Esq.

5 at [REDACTED] New York, New York is? Could
6 you tell me who he is?

7 A. He is a lawyer.

8 Q. What is his connection with the LLC?

9 A. He helped create it.

10 Q. Did you hire him to create it?

11 A. I don't recall how it went down exactly.
12 How he came to do it. But, he was the lawyer. And
13 he helped create it.

14 Q. Was he referred to you by somebody?

15 A. He worked for a friend of mine.

16 Q. Who is that?

17 A. A gentlemen called Mr. Epstein.

Page 31 (Miami Beach address in 2014)

9 Q. What is the address at [REDACTED]

10 [REDACTED] Miami Beach, Florida 33139?

11 A. That was a home that I rented for a short
12 while, and I stayed at the address.

13 Q. When did you rent it?

14 A. I don't recall the dates. I am sorry.

15 Q. Was it in the year 2014.

16 A. I honestly don't remember.

Page 32 (Douglas Elliman was broker for sale of NY home)

11 Q. Was that based on your accountant or a
12 legal advise or on your own?

13 A. I'm sure that was based on legal advise.

14 Q. Did you have a lawyer that formed it for
15 you?

16 A. You are asking things to go back over 20
17 years. I don't recall exactly how it went down.

18 Q. Did you utilize the services of a broker in
19 purchasing [REDACTED]

20 A. I don't remember.

21 Q. Did you utilize the services of a broker
22 when selling [REDACTED]

23 A. I did.

24 Q. Was that Douglas Elliman?

25 A. It was.

Page 40 (Odd that she says not married at the time ... could she be married now)?

1 GHISLAINE MAXWELL
2 A. No.
3 Q. Who lived in [REDACTED] on
4 September 9, 2015?
5 A. Excuse me?
6 Q. Are you married?
7 A. I was not married at the time of this.
8 Q. Do you have any children?
9 A. No.
10 Q. Did you have any help that lived in the
11 house with you?
12 A. No.
13 Q. Did you have a housekeeper?
14 A. I did have a housekeeper, yes.
15 Q. Live out or live in?
16 A. Out.

Page 47 (says she used a MAC or laptop in 2015)
(for ESI)

15 Q. Were there computers kept in that office?
16 A. There was a computer in that office.
17 Q. What kind of computer was it?
18 A. I think it was a Mack.
19 Q. Was it a laptop or desktop?
20 A. I think it was a desk top. It could have
21 been a laptop. I don't know.
22 Q. Who owned that desktop?
23 A. Well, if it was a desk top it would have
24 been me. Actually I think it was laptop in 2015.
25 Q. Back in September of 2015, was there a desk

Maxwell had a filing cabinet (hard copy records)

A. I didn't have business records.

Q. Where did you keep the records for Ellmax, LLC.?

A. I use to move my -- I had a file cabinet wherever I was sitting. I had a filing cabinet.

Q. Where would that be kept? On what floor in the building?

A. It moved. I frequently moved my desk. I couldn't decide where I would sit. There was a period of time in the dining room became a place where I would sit and the library. When I moved my desk my little filing system cop come with me.

Page 52-53 (Tax returns reflect Maxwell claiming to work 60 hour weeks for Terramar)

15 Q. Referring to the bottom portion next to the
16 yellow label of Plaintiff's Exhibit 10. Directing
17 your attention to Page 8 of the tax return. Do you
18 see this page?

19 A. I do.

20 Q. Did you indicate in this tax return that
21 you worked 60 hours a week on the Terramar Project?

22 A. Yes.

23 Q. Did you have other officers at that time
24 that worked for the Terramar Project?

25 A. Well, [REDACTED] done 23 hours.

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1 GHISLAINE MAXWELL

2 Q. Is that accurate?

3 A. I'm sure it is.

Page 54-55 Claims only "contract contractors" who paid for work – but she and other board members did not receive compensation.

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25 A. These are just all directors and none of

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1 GHISLAINE MAXWELL

2 them were renumerated. Nobody was paid. But,
3 Terramar Project did have work called contract
4 contractors who did do work for it. A contract
5 employee or contract person that worked for the
6 company is not the same as a regular employee. They
7 wouldn't come to work.

8 Q. Who was that? -

9 A. I have had a number of -- I had a number of
10 different people. We also have one person who did
11 work for Terramar Project. They were always
12 offsite, because they would never come to work.
13 They would be remote.

**Page 55: Robert Foos was a contracted employee for Terramar (Director of Development)
Who paid him?**

EFTA00011377

14 Q. Were there any contracting employees back
15 in 2015 for Terramar Project, Inc.?

16 A. There were, yes.

17 Q. Who were they?

18 A. One. I believe it was Robert Foos.

19 Q. In what position did he hold?

20 A. I think his official title was Director Of
21 Development.

22 Q. Does the additional data sheet indicate
23 that you were also working 60 hours a week for
24 Terramar Project back in 2013?

25 A. Yes.

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1

GHISLAINE MAXWELL

Page 57-58 (Mark, Paneth & Shron prepared her taxes for Terramar)

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23 Q. Was the accountant that prepared it Mark,
24 Paneth & Shron, LLP., [REDACTED] New York,
25 New York 100017, as indicated on Plaintiff's Exhibit

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1 GHISLAINE MAXWELL
2 10?
3 A. It may have been.
4 Q. Were they your accountants?
5 A. They were.
6 Q. Do they always file your personal tax
7 returns and the tax returns for the Terramar
8 Project?

Page 66 (Discussed deed being titled as [REDACTED]

15 Q. When it was purchased in 2000, do you
16 recall if you purchased it using [REDACTED]
17 [REDACTED] LLC.? [REDACTED]
18 A. I believe I did.
19 Q. Were you the sole member of [REDACTED]
20 [REDACTED] LLC.? [REDACTED]
21 A. Yes.
22 Q. Were you advised either by a lawyer or an
23 accountant to purchase the home through an LLC?
24 A. I don't recall, but I'm sure I was.

1 GHISLAINE MAXWELL

2 Q. When in town is that where you would sleep?

3 A. Yes.

4 Q. You had your master bedroom in the house at

5 [REDACTED]?

6 A. Yes.

7 Q. That was all the time between 2000 thru
8 2016?

9 A. Yes.

10 Q. With respect to the Terramar Project, did
11 you ever collect or have you ever collected any
12 salary as the president of the Terramar Project?

13 A. No.

Page 73-74

14 Q. Have you received any remuneration of any
15 kind from the Terramar Project for your service for
16 that not-for-profit entity?

17 A. No.

18 Q. Is there any place in the home, at [REDACTED]
19 [REDACTED] that is set aside for use solely by the
20 Terramar Project?

21 A. No.

Q. When you worked for a particular company,

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1 GHISLAINE MAXWELL

2 did you work with them at their premises?

3 A. Yes.

4 Q. Did you ever had them come to your
5 business, to [REDACTED] to do that work?

6 A. No.

7 Q. During the period of time that Ellmax
8 functioned, did it generate revenue?

9 A. A small amount.

10 Q. Did you ever collect a salary for Ellmax?

11 A. No.

12 Q. Were you ever disbursed any profits from
13 Ellmax?

14 A. No.

15 Q. What happened to the revenue that Ellmax
16 generated during that period of time, from 2010 to
17 2013?

18 A. It just was used to defer cost such as
19 traveling and travel mostly.

20 Q. What were the costs of travel related to
21 Ellmax where you were going?

22 A. Sorry, most of the companies I would have
23 worked for were from Los Angeles. I went to LA and
24 also to London multiple times.

Page 76-77 (Monte Albers De Leon closing lawyer for house/Maxwell did not attend closing).

19 Q. Did you attend the closing when you sold
20 the building at [REDACTED]
[REDACTED]

21 A. No.

22 Q. Did you authorize somebody to attend the
23 closing for you?

24 A. Yes.

25 Q. Who was that?

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1 GHISLAINE MAXWELL

2 A. The lawyer that is on that. I don't
3 remember his name. Monte Albers De Leon.

4 Q. Who is he? Is he your lawyer?

5 A. He was a lawyer that I used.

Sandra Perkins Borger
Case Manager

BOIES SCHILLER FLEXNER LLP

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