

# **EXHIBIT E**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

May 18, 2016

9:04 a.m.

C O N F I D E N T I A L

Deposition of JOHANNA SJOBERG, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 in your view?

2 A. Yes.

3 Q. Did you ever -- did you at that time  
4 wonder why she was traveling with Jeffrey?

5 A. At that time, I did not.

6 Q. Did you later wonder that?

7 A. Yes.

8 Q. And what was your impression?

9 MS. MENNINGER: Objection, vague,  
10 speculative.

11 THE WITNESS: I -- we're jumping ahead; is  
12 that okay?

13 BY MS. McCAWLEY:

14 Q. Yes, that's okay.

15 A. A few days later, I remember asking her  
16 questions to try to figure out her role, why she was  
17 there, and she gave me vague answers and was never  
18 specific.

19 And so I thought perhaps she just was an  
20 assistant, someone that did massages well. I wanted  
21 to believe that she was innocent.

22 Q. Did you ever refer to her as being  
23 orphan-like?

24 A. I did.

25 Q. And how did that come about?

1 And I can't recall if they were in the main living  
2 areas.

3 Q. Did you see them in the stairwell up to  
4 the second story of the house?

5 A. I can't recall.

6 Q. Do you know who -- who the people were in  
7 those photos? Were you familiar with any of them?

8 A. No.

9 Q. Were you in any of those photos?

10 A. At one point, yes.

11 Q. And were you naked in that photo?

12 A. Topless.

13 Q. Do you recall seeing any naked photos of  
14 Virginia Roberts?

15 A. I do not.

16 Q. Where did you go next, after the New York  
17 visit?

18 A. I went to the Virgin Islands.

19 Q. And who told you that you would be going  
20 to the Virgin Islands?

21 A. He asked me if I wanted to go, and I said  
22 I would still like to go.

23 Q. And do you recall who you -- who went with  
24 you to the Virgin Islands?

25 A. I believe -- well, I know Virginia was

1 leading.

2 THE WITNESS: Jeffrey Epstein; Ghislaine  
3 Maxwell; AP and PK are the two women I do not  
4 recall; Virginia Roberts; and myself.

5 BY MS. McCAWLEY:

6 Q. Do you recall how you flew back from the  
7 location in the US Virgin Islands?

8 A. They put me on a commercial flight. I  
9 wanted to be home in time for Easter.

10 Q. When you say "they," do you recall who  
11 made those arrangements for you?

12 A. It could have been Ghislaine.

13 Q. Did you -- do you recall performing  
14 massages while you were in the US Virgin Islands?

15 A. Yes.

16 Q. Who was involved in -- was there more than  
17 one?

18 A. Yes. I massaged Ghislaine at one point.  
19 And I massaged Jeffrey, Virginia and I, both, on the  
20 beach.

21 Q. Were you dressed during the massage that  
22 was on the beach?

23 A. Yes. Bikinis probably, most likely.

24 Q. Do you recall what Virginia was wearing?

25 A. I believe she was wearing a bathing suit,

1 Q. Did you ever see Ghislaine Maxwell during  
2 that trip laying out by the pool?

3 A. There was one time where we were all by  
4 the pool, yes.

5 Q. Was Ghislaine Maxwell ever nude or topless  
6 by the pool?

7 A. I don't recall. She was nude when she  
8 went swimming in the ocean.

9 Q. At that moment in the USVI home, did you  
10 observe any photos there of nude females?

11 A. I don't recall.

12 Q. Besides Virginia, who you mentioned, you  
13 observed to be young, did you observe any other  
14 females that in your view appeared to be essentially  
15 under the age of 18?

16 A. No.

17 Q. Did you observe any females who you  
18 thought looked young, younger than you?

19 A. No.

20 Q. Do you remember an individual by the name  
21 of [REDACTED] that you met during your time with Jeffrey  
22 Epstein?

23 A. In Palm Beach?

24 Q. Yes.

25 A. Yes.

1           A.     Sarah Kellen was there. Ghislaine was  
2     there. That's all I recall.

3           Q.     Do you recall why you went on the trip to  
4     New Mexico?

5           A.     To work.

6           Q.     Did you perform massages on that trip?

7           A.     Yes.

8           Q.     Did you -- do you recall whether you  
9     performed massages with Sarah Kellen on that trip?

10          A.     No.

11          Q.     Do you recall in the New Mexico home ever  
12     observing nude photos of females there?

13          A.     I don't recall.

14          Q.     When you would provide massages, would you  
15     provide those massages naked?

16          A.     On occasion.

17          Q.     On average, would you be naked, if it was  
18     100 percent of the time, more than 50 percent of the  
19     time?

20          A.     Can you repeat it?

21          Q.     Sure. When you're performing the  
22     massages, can you tell me -- you said on occasion.  
23     Over the five years that you worked for him, how  
24     often did you perform massages naked?

25          A.     Somewhere between 25 and 50 percent of the

1 observed her personality to be?

2 A. Sure. She definitely had a great sense of  
3 humor, she loved making jokes. I mean, in a very  
4 British way. I don't remember her ever laughing,  
5 but she was funny.

6 And I remember just thinking, she -- the  
7 first weekend that we flew to the Virgin Islands,  
8 she flew the helicopter from Saint, wherever we were  
9 to little Saint Jeff [sic] or whatever the name of  
10 the island was, and I just thought, wow, who is this  
11 woman.

12 Q. Would you say that you respected her?

13 A. Yes.

14 Q. When you ended up getting in the car with  
15 her and this other woman and going back to the  
16 house, who was driving the car?

17 A. She was driving.

18 Q. And where did she take you?

19 A. She took me to the house in Palm Beach.

20 Q. And can you describe the house in Palm  
21 Beach?

22 A. Sure. It's at the end of El Brillo Way,  
23 on the Intracoastal. The house was either white or  
24 pink. It was pink at one time it may have been  
25 painted. It was nothing fancy, it was large, it was



1 something. That's all I recall.

2 Q. Did you go anywhere with Virginia?

3 A. Oh, my gosh, yes. We went to Phantom of  
4 the Opera.

5 Q. Who else went?

6 A. I think it was just she and I. I forgot  
7 about that. Thank you for that memory.

8 Q. It's my job.

9 Anything else you remember about that day  
10 in New York?

11 A. No.

12 Q. You said you had given a massage to  
13 Jeffrey while you were there on that trip or was it  
14 a subsequent trip?

15 A. That trip.

16 Q. And how did that come to be?

17 A. Either he or somebody asked me to go and  
18 do it. Someone showed me to the room, but I don't  
19 remember who it was.

20 Q. Can you describe that room?

21 A. Yes. It was high ceilings, dark. There  
22 were, like, dark red walls or dark blue walls or  
23 dark blue carpeting or something. It had a massage  
24 table set up in the middle, and there was a large --  
25 I want to say like a 15-foot photo, either photo or

1 Q. Do you know personally whether anyone else  
2 had said no to him?

3 A. No.

4 Q. Did anyone ever tell you that they had  
5 been in a massage scenario and told him no?

6 A. No.

7 Q. Do you recall when in your trip the  
8 massage occurred?

9 A. Well, it was not the day we landed. It  
10 must have been that next day that we were there.

11 Q. Do you remember anything else about  
12 Virginia from that trip other than the Prince Andrew  
13 thing and Phantom of the Opera?

14 A. Well, we were getting ready to leave to go  
15 to the airport, and we were waiting. She and I sat  
16 on the steps in the foyer. I do remember just kind  
17 of asking a few questions to try to understand her  
18 role, because at that point now I knew what he  
19 wanted from me in the massage. And -- but she did  
20 not make it clear to me that she was participating  
21 in that. So I was prodding gently to see if there  
22 was anything happening that shouldn't have been,  
23 because I was getting the impression that she was --  
24 she told me she was 17.

25 Q. She told you she was 17?

1 A. Uh-huh.

2 Q. How did that come up?

3 A. I asked her.

4 Q. Was anyone else present during this  
5 conversation?

6 A. No.

7 Q. You mentioned in your earlier testimony  
8 that she seemed orphan-like.

9 A. Yes.

10 Q. But you said that was something you had  
11 said to Ms. McCawley, correct?

12 A. Correct.

13 Q. That was not said at the time?

14 A. Right. No. At the time I was getting an  
15 impression that she did not have a family or she had  
16 walked away from her family. And it seemed to me,  
17 you know, they had just sort of adopted her, not as  
18 a child, but they would take care of her.

19 Q. Did you observe anyone speaking to her as  
20 a child, like make up your bed?

21 A. No.

22 Q. Did you observe whether she was using  
23 drugs during that trip?

24 A. No.

25 MS. McCAWLEY: Objection.

1 celebration or cake with candles. It was just  
2 another day.

3 Q. You said that the Virgin Islands were a  
4 part of that second trip, as well?

5 A. Yes.

6 Q. And do you remember Ghislaine being part  
7 of the Virgin Islands the second time?

8 A. Yes. That's when she called -- went to  
9 bed and kissed us all on the head and called us her  
10 children.

11 Q. Who were the other participants in that  
12 session?

13 A. That's who -- I don't recall who was  
14 there. I want to say that [REDACTED] was.

15 Q. But Virginia was not there?

16 A. Virginia was not there.

17 Q. Do you recall the point in time in which  
18 Virginia went away?

19 A. Sort of. After the trip to New York, I  
20 was given her phone number to call. And I remember  
21 one time I tried to get ahold of her. Her boyfriend  
22 answered. A boyfriend, I would assume, and he  
23 sounded like he was high. And I couldn't find out  
24 where she was. And then from there on, she was out  
25 of the picture.

1 Q. Do you recall how long after the New York  
2 trip that occurred?

3 A. I would say it was probably within a month  
4 or two.

5 Q. Did she tell you she was working  
6 elsewhere?

7 A. No.

8 Q. Did you ask her?

9 A. No.

10 Q. Did she mention that she was a waitress?

11 A. No.

12 Q. And worked at Taco Bell?

13 A. Huh-huh.

14 Q. Did you speak to her boyfriend or a  
15 boyfriend at any other time associated with her?

16 A. No.

17 Q. Did you meet her boyfriend?

18 A. No.

19 Q. Her fiancé?

20 A. No.

21 MS. McCAWLEY: Objection.

22 BY MS. MENNINGER:

23 Q. When you were on the plane with Jeffrey  
24 during these two trips, he was present on all of  
25 those flights?

1 A. Yes.

2 Q. Did you observe any sexual behavior  
3 happening on the plane?

4 A. No. He told me a story of something that  
5 had happened one time.

6 Q. Did it involve Ghislaine Maxwell?

7 A. No.

8 Q. Did it involve Virginia Roberts?

9 A. No.

10 Q. And you didn't see anything?

11 A. No.

12 Q. You did give massages to Ghislaine  
13 Maxwell, correct?

14 A. Yes.

15 Q. On how many occasions?

16 A. Maybe somewhere between five and 10.

17 Q. Was that over the course of the five  
18 years?

19 A. Yes.

20 Q. Was there some point during that five  
21 years where Ghislaine Maxwell was not around as  
22 much?

23 A. Yes.

24 Q. Do you recall when that was?

25 A. In the middle.

1 Q. Did you know why that might be?

2 A. No.

3 Q. Is that about the time that you started  
4 seeing [REDACTED] more frequently?

5 A. Yeah, I guess she was probably in the  
6 picture more. Her and Sarah both had kind of been  
7 around the most.

8 Q. Did you observe [REDACTED] or Sarah appearing  
9 to act like Jeffrey's girlfriend?

10 A. [REDACTED], not Sarah.

11 Q. What did you observe?

12 A. She was just very loving, kissing him.

13 Q. Did you know how old she was?

14 A. I didn't know.

15 Q. So you gave massages to Ghislaine five or  
16 10 times. Was there anything unusual about those  
17 massages?

18 A. No.

19 Q. You've been quoted in the press perhaps as  
20 saying that she wasn't very picky?

21 A. About massage?

22 Q. About her massages.

23 A. Not like Jeffrey, I guess. I mean, saying  
24 that meant that, you know, I would do whatever I  
25 wanted to do in the massage; whereas, Jeffrey was,

1     like, Do my foot, do my leg. He would kind of  
2     narrate what he wanted. She just wanted a massage.  
3     So if that makes sense.

4             Q. She may have been naked under a towel --

5             A. Definitely.

6             Q. -- in a regular massage fashion?

7             MS. McCAWLEY: Objection.

8             THE WITNESS: Yes. Actually, I do recall  
9     an instance where I was massaging her and  
10    Jeffrey came into the room and he did something  
11    sort of sexual to her, whether it was fondling  
12    her or slapping her butt or something, and she  
13    brushed him off like she was embarrassed.

14    BY MS. MENNINGER:

15            Q. So she never asked you to touch her in a  
16    sexual manner, correct?

17            A. No.

18            Q. And she did not rub her breasts on you,  
19    for example?

20            A. No.

21            MS. McCAWLEY: Objection.

22    BY MS. MENNINGER:

23            Q. She did not demand that you perform oral  
24    sex on her?

25            A. No.



1 Q. Did she did not demand that you undress  
2 during your massages?

3 A. No.

4 Q. There was nothing from her that was sexual  
5 during the massages that you gave to her?

6 MS. McCAWLEY: Objection.

7 THE WITNESS: Correct.

8 BY MS. McCAWLEY:

9 Q. Do you recall when the last time you gave  
10 her a massage was?

11 A. I don't recall.

12 Q. Do you recall meeting with her in about  
13 2006 when she was in town for some helicopter  
14 training?

15 A. I do recall that.

16 Q. Do you recall giving her some massages  
17 during that period?

18 A. Yes.

19 Q. Do you remember going out to dinner with  
20 her and to a movie?

21 A. I remember to a movie, and I don't  
22 remember if we went to dinner. I remember her  
23 cooking dinner. That was another way she impressed  
24 me: She knew how to cook like a chef. She had done  
25 some culinary training.

1 Q. And you guys had a normal type  
2 conversation?

3 A. Yes. It was very fun.

4 MS. McCAWLEY: Objection.

5 MS. MENNINGER: I would like to take about  
6 a 5-, to 10-minute break, if that's okay.

7 THE VIDEOGRAPHER: Off the record at  
8 11:05.

9 (Thereupon, a recess was taken, after  
10 which the following proceedings were held:)

11 THE VIDEOGRAPHER: This is the beginning  
12 of Disk 2. On the record at 11:25.

13 BY MS. MENNINGER:

14 Q. Hi. I believe when we left off I was  
15 asking you about massages that you gave to  
16 Ghislaine.

17 Did Ghislaine pay you when she got a  
18 massage from you?

19 A. Yes.

20 Q. Do you know how much she paid you?

21 A. I believe it was 200. It was the going  
22 rate.

23 Q. The same as you were getting paid by  
24 Jeffrey, correct?

25 A. Yes.

1 Q. How much?

2 A. One hundred dollars extra.

3 Can I clarify?

4 Q. Absolutely.

5 A. He didn't ever say he would pay me more,  
6 but when the massage was more than just a massage  
7 and it was sexual, then he would pay me more.

8 Q. It wasn't a discussion; it's just what  
9 happened?

10 A. Correct.

11 Q. Thank you for clarifying.

12 The things that took place with you and  
13 Jeffrey behind closed doors were when you were a  
14 consenting adult, correct?

15 A. Yes.

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Correct.

18 BY MS. MENNINGER:

19 Q. And you did not have knowledge of what  
20 took place with other women behind closed doors and  
21 Jeffrey, correct?

22 MS. McCAWLEY: Objection.

23 THE WITNESS: Correct.

24 BY MS. MENNINGER:

25 Q. Do you recall giving an interview to a

1 reporter from the Mail on Sunday?

2 A. Yes.

3 Q. You told that reporter, I believe, that  
4 the police report painted a picture that it was a  
5 big orgy all the time, but it wasn't?

6 A. What I saw, I did not see anything out in  
7 the open sexually. Me, personally.

8 Q. Right. You did not see orgies happening  
9 in the pool, for example?

10 A. No.

11 Q. You did not see people engaging in sexual  
12 conduct out in the open areas of the home, correct?

13 A. Right.

14 MS. McCAWLEY: Objection.

15 BY MS. MENNINGER:

16 Q. When you became aware of the allegations  
17 against Jeffrey, those came as a surprise to you,  
18 correct?

19 MS. McCAWLEY: Objection.

20 THE WITNESS: Correct.

21 BY MS. MENNINGER:

22 Q. And the surprise was that it involved  
23 underaged girls making that allegation, correct?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: Correct.

1 BY MS. MENNINGER:

2 Q. You were asked some questions with  
3 Ms. McCawley about nude photographs that were  
4 present in the home? Homes?

5 A. Uh-huh.

6 Q. In Palm Beach, I believe you said there  
7 were some in the room where the massage table was?

8 A. Yes.

9 Q. Can you tell me what you recall seeing?

10 A. It wasn't candid photos. They were all,  
11 like, staged.

12 Q. Like a model?

13 A. Yes. And my -- I don't recall necessarily  
14 knowing any of the people in those photos. I  
15 remember at one point there was a photo of myself,  
16 but...

17 Q. Were they fully frontally nude or were  
18 they staged, like, with, you know, parts of bodies  
19 showing?

20 A. I really only remember topless photos. I  
21 don't remember full frontal photos.

22 Q. So exposing the breasts, but not exposing  
23 the genitalia?

24 A. Not that I recall. And Ghislaine's  
25 bathroom, I believe there was a photo of her

1 topless, or a painting.

2 Q. A painting?

3 A. Uh-huh.

4 Q. Did you see any nude or semi-clad photos  
5 of young girls?

6 A. No.

7 Q. Preteens, for example?

8 A. No.

9 Q. Something you would consider child  
10 pornography?

11 A. Never.

12 Q. Other than in the bathroom or the massage  
13 room at the Palm Beach home, do you recall any other  
14 place in the Palm Beach home where you saw any of  
15 these topless photos of women?

16 A. I remember there being photos everywhere,  
17 and the ones that stick out in my memory are the  
18 ones -- there was a photo of Ghislaine with the  
19 Pope. It would not surprise me if there were naked  
20 photos around. I just didn't retain them in my  
21 memory.

22 Q. So when you say there were photos  
23 everywhere, you mean just photos in general?

24 A. Yes. They had a lot of photos around the  
25 house.

1 MS. McCAWLEY: Objection.

2 BY MS. MENNINGER:

3 Q. And Ghislaine was not topless in a photo  
4 with the Pope, just so I'm clear?

5 A. Correct.

6 Q. I just want to make sure we get that  
7 record really clear.

8 So you recall there being photos  
9 everywhere; you just remember a couple sticking out  
10 in your brain as being topless?

11 A. Yes.

12 Q. And the walls on the staircase to the  
13 upstairs were not just covered with nude  
14 photographs, to your recollection?

15 A. To my recollection, I just -- I don't  
16 remember.

17 Q. Did you observe what you would consider to  
18 be child pornography on any computer in the home?

19 A. No.

20 Q. Did you observe anyone taking photographs  
21 of young girls in the home?

22 A. No.

23 Q. The photograph of yourself that you saw,  
24 was that something that you had posed for?

25 A. Not, like, professionally. But I was just

1 sitting, and I believe Jeffrey took the photo. I  
2 was just sitting on a couch upstairs in the  
3 bathroom.

4 Q. It wasn't taken by a hidden camera?

5 A. No. No. I was smiling in the picture.

6 Q. And, likewise, in the New York home, did  
7 you see anything -- you described a large painting  
8 or a photograph that was in the massage room?

9 A. Yes.

10 Q. Do you recall any other photos of  
11 semi-clad or naked females?

12 A. I don't recall.

13 Q. Anything that you would consider to be  
14 child pornography that you saw in the New York home?

15 A. No.

16 Q. And, likewise, in New Mexico?

17 A. I don't recall.

18 Q. Do you recall seeing any semi-clad photos  
19 in New Mexico at all?

20 A. I do not recall.

21 Q. And the Virgin Islands?

22 A. Yes, in his bathroom, master bathroom.

23 Q. And what do you recall, if anything, about  
24 that photo?

25 A. There was a photo of me in there.



1 A. Right.

2 Q. And an increase corresponding to massages  
3 you were giving to guests, correct?

4 A. Yes.

5 Q. Did any of the guests for whom you gave a  
6 massage mention that they expected something sexual?

7 A. No.

8 Q. Did they ask you to engage in sexual  
9 contact and you refused?

10 MS. McCAWLEY: Objection.

11 THE WITNESS: No.

12 BY MS. MENNINGER:

13 Q. Marvin Minsky?

14 A. I don't know that.

15 Q. George Lucas?

16 A. No.

17 Q. Donald Trump?

18 A. No.

19 Q. Did you ever massage Donald Trump?

20 A. No.

21 Q. Sorry, I have to ask, but did you ever  
22 have sex with Alan Dershowitz in the back of a  
23 limousine with Virginia and Jeffrey present?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: Absolutely not.

1 BY MS. MENNINGER:

2 Q. Do you know who Alan Dershowitz is?

3 A. I do.

4 Q. You would remember --

5 A. I would remember that.

6 Q. Did you ever see Virginia Roberts with any  
7 of the people that I just asked you about?

8 A. No.

9 Q. Did Virginia ever talk to you about having  
10 been with any of those people?

11 MS. McCAWLEY: Objection.

12 THE WITNESS: No.

13 BY MS. MENNINGER:

14 Q. Did she tell you that she had met any of  
15 those people?

16 A. No.

17 Q. I believe you saw in that police report a  
18 reference to a friend of Jeffrey named Glenn and his  
19 wife?

20 A. Uh-huh.

21 Q. Do you remember them?

22 A. Vaguely.

23 Q. Tell me what you remember.

24 A. I remember they had an apartment in -- on  
25 Breakers Row. I went up there and massaged. It may

1 have been more than once, but I only really remember  
2 one time. But there was nothing sexual.

3 Q. Neither with the wife, nor with Glenn?

4 A. Right.

5 Q. Do you remember the apartment?

6 A. I only remember that I had to carry my  
7 massage table up some stairs.

8 Q. So you actually gave the massage on a  
9 massage table?

10 A. Yes.

11 Q. Does that help you place it in time as to  
12 when that might have occurred? In other words --

13 A. Well --

14 Q. -- did you get your massage license at  
15 some point and a massage table?

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Yes. He bought me my  
18 massage table around the time that I went to  
19 massage school. So it could have been any time  
20 after. If I thought really hard, I could  
21 remember when I went to school. But it -- I  
22 want to say it's around 2003.

23 BY MS. MENNINGER:

24 Q. Nothing sexual happened with Glenn?

25 A. No.

1 Q. Did Glenn ask you to give him a massage on  
2 the floor of the home?

3 A. I don't recall.

4 Q. Did you ever discuss Glenn with Virginia?

5 A. Not to my recollection.

6 Q. Did you ever go to Virginia's home?

7 A. No.

8 Q. Do you know where she lived?

9 A. No.

10 Q. Did she talk about it?

11 A. Not that I remember.

12 Q. Did you see anything in your interactions  
13 with Virginia that led you to believe that she was a  
14 sex slave?

15 MS. McCAWLEY: Objection.

16 THE WITNESS: No.

17 BY MS. MENNINGER:

18 Q. Did you see anyone forcing her to remain  
19 in the home?

20 A. No.

21 Q. Did you see her look traumatized at some  
22 point?

23 MS. McCAWLEY: Objection.

24 THE WITNESS: No.

25

1 BY MS. MENNINGER:

2 Q. Did you see anything that led you to  
3 believe Virginia Roberts had been trafficked,  
4 sexually trafficked to third parties?

5 MS. McCAWLEY: Objection.

6 THE WITNESS: No.

7 BY MS. MENNINGER:

8 Q. Did Virginia ever tell you that she had  
9 been trafficked?

10 A. No.

11 MS. McCAWLEY: Objection.

12 BY MS. MENNINGER:

13 Q. Did you hear anyone direct Virginia  
14 Roberts to go have sex with someone?

15 A. No.

16 Q. Did Jeffrey ever ask you to go have sex  
17 with another person?

18 A. No.

19 Q. Did Ghislaine Maxwell ever ask you to go  
20 have sex with another person?

21 A. No.

22 Q. Did Ghislaine Maxwell ever ask you to give  
23 a massage to someone else?

24 A. No.

25 Q. Did Ghislaine Maxwell ever ask you to

1 Q. Okay. That's fine.

2 A. Yeah, sure.

3 Q. If it doesn't, it doesn't. I'm just  
4 asking.

5 Did Virginia say anything to you about  
6 having met Prince Andrew before this time in New  
7 York?

8 MS. McCAWLEY: Objection.

9 THE WITNESS: She did not say.

10 BY MS. MENNINGER:

11 Q. Did Prince Andrew say or do anything that  
12 led you to believe that he had met Virginia prior to  
13 that time?

14 A. I don't recall.

15 Q. Did you ever see Al Gore on the island?

16 A. No.

17 Q. Did you see his wife, Tipper Gore, on the  
18 island?

19 A. No.

20 Q. What is your understanding of what the  
21 lawsuit we are here today is about?

22 A. I understand that Ghislaine is calling  
23 Virginia a liar, and so Ghislaine is suing Virginia.  
24 I'm sorry. Strike that. Reverse it.

25 Right, Virginia is suing Ghislaine for

1 always covered himself with a towel.

2 Q. I believe I asked this, but I just want to  
3 clarify to make sure that I did: Did Maxwell ever  
4 ask you to bring other girls over to -- for Jeffrey?

5 A. Yes.

6 Q. Yes?

7 A. Yes.

8 Q. And what did you -- did you do anything in  
9 response to that?

10 A. I did bring one girl named [REDACTED] --  
11 no. [REDACTED] -- it was some girl named [REDACTED]  
12 that I had worked with at a restaurant. And I  
13 recall Ghislaine giving me money to bring her over;  
14 however, they never called her to come.

15 Q. And then I believe you mentioned that one  
16 of your physical fitness instructors, you brought a  
17 physical fitness instructor; was that correct?

18 A. Correct.

19 Q. And what did she do?

20 A. She gave him a -- like a training session,  
21 twice.

22 Q. Twice.

23 Did anything sexual in nature happen  
24 during the session?

25 A. At one point he lifted up her shirt and

1 exposed her bra, and she grabbed it and pulled it  
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told  
5 her that he had taken this girl's virginity, the  
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it  
8 takes the pressure off of her to have other girls  
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if  
14 Maxwell ever asked you to perform any sexual acts,  
15 and I believe your testimony was no, but then you  
16 also previously stated that during the camera  
17 incident that Maxwell had talked to you about not  
18 finishing the job.

19 Did you understand "not finishing the job"  
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that  
24 question.

25 What did you understand Maxwell to mean



1 expected to have sexual intercourse with Jeffrey?

2 A. Yes.

3 Q. And when was that?

4 A. 2005.

5 MS. McCAWLEY: That's it. I just do want  
6 to also put on the record that we're  
7 designating the testimony as confidential under  
8 the protective order.

9 F U R T H E R E X A M I N A T I O N

10 BY MS. MENNINGER:

11 Q. Okay. You just testified that you have  
12 knowledge -- you had knowledge that -- of what  
13 Jeffrey was doing behind closed doors with other  
14 girls. Was that your testimony?

15 A. Based on what he had told me.

16 Q. Okay. So Jeffrey told you things that he  
17 had done with other girls?

18 A. Yes.

19 Q. You did not observe any of those things?

20 A. No.

21 Q. You did not talk to any of those girls  
22 about what they had done with Jeffrey behind closed  
23 doors?

24 MS. McCAWLEY: Objection.

25

1 Q. When I say "girl," I really mean women,  
2 correct?

3 A. Correct.

4 Q. There were other women around who hung out  
5 with Jeffrey, and you don't know what they did  
6 behind closed doors, correct?

7 A. Correct.

8 Q. So when you heard the implication that she  
9 wanted other girls around to take the pressure off  
10 of her sexually, in your mind that meant other adult  
11 women that he had in his life, correct?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: Correct, doing what I was  
14 expected to do in a massage, you know.

15 BY MS. MENNINGER:

16 Q. Ghislaine didn't have anything to do with  
17 you bringing this woman over for a physical workout  
18 with Jeffrey, correct?

19 A. Correct.

20 Q. She asked you to bring another girl to  
21 be -- to perform massages at the home?

22 A. Yes. Well, she was always asking if I  
23 knew anyone else. And so I brought this one girl  
24 that I didn't even know I worked with her at a  
25 restaurant. So I didn't care what she thought of me

1 if anything happened. And so -- but it never turned  
2 into anything.

3 Q. She was an adult?

4 A. She was an adult.

5 Q. Working at a restaurant with you?

6 A. Yes.

7 Q. What restaurant was that?

8 A. It's a restaurant that's closed. It's  
9 called BD's Mongolian Barbecue.

10 Q. You were asked about the famous people.  
11 You said you met Michael Jackson?

12 A. Yes.

13 Q. But you did not give him a massage?

14 A. No.

15 Q. There were other famous people, perhaps,  
16 who were around Jeffrey's home that you didn't meet,  
17 correct?

18 A. Correct.

19 Q. Do you know whether Virginia Roberts has  
20 told the truth about the age she was when she met  
21 Ghislaine Maxwell?

22 MS. McCAWLEY: Objection. Exceeds the  
23 scope of cross.

24 THE WITNESS: I don't have any idea what  
25 she told them in terms of her age.