

# **EXHIBIT A**

HIGHLY CONFIDENTIAL AEO  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

Case No:

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----x

HIGHLY CONFIDENTIAL  
DEPOSITION OF SARAH RANSOME  
NEW YORK, NEW YORK  
Friday, February 17, 2017

Reported by:

JEREMY RICHMAN

JOB NO: 300491

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HIGHLY CONFIDENTIAL AEO

February 17, 2017  
9:00 a.m.

DEPOSITION of SARAH RANSOME, held  
at the offices of Boies, Schiller & Flexner,  
575 Lexington Avenue, New York, New York,  
before JEREMY RICHMAN, a Shorthand Reporter and  
Notary Public of the State of New York.

1 HIGHLY CONFIDENTIAL AEO

2 APPEARANCES:

3

4 BOIES, SCHILLER & FLEXNER, LLP

5 Attorneys for plaintiff

6 401 East Las Olas Boulevard, Suite 1200

7 Fort Lauderdale, FL 33301-2211

8 BY: SIGRID STONE MCCAWLEY, ESQ.

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10

11

12 HADDON, MORGAN AND FOREMAN, P.C

13 Attorneys for Defendant

14 150 East 10th Avenue

15 Denver, CO 80230

16 BY: LAURA A. MENNINGER, ESQ.

17 JEFFREY S. PAGLIUCA, ESQ.

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19 (jpagliuca@hmflaw.com)

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22

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1 HIGHLY CONFIDENTIAL AEO

2 APPEARANCES (Continued):

3

4 J. STANLEY POTTINGER, PLLC

5 Attorneys for the witness

6 49 Twin Lakes Road, Suite 100

7 South Salem, NY 10590

8 BY: J. STANLEY POTTINGER, ESQ.

9 (stanpottinger@aol.com)

10

11

12 MINTZ & GOLD, LLP

13 Attorneys for the witness

14 600 Third Avenue

15 New York, NY 10016

16 BY: PETER GUIRGUIS, ESQ.

17 (guirguis@mintzandgold.com)

18

19

20 ALSO PRESENT:

21 GHISLAINE MAXWELL, via teleconference

22

23

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1           HIGHLY CONFIDENTIAL AEO  
2           just ask a question? I would  
3           like to just clarify. When you  
4           say objection, does that mean I  
5           actually have to answer the  
6           question? Because that's  
7           irrelevant.

8           MR. GUIRGUIS: Right.  
9           Unless I'm telling you not to  
10          answer, you need to answer.

11          THE WITNESS: So I don't  
12          need to answer?

13          MR. GUIRGUIS: No, you do  
14          need to answer this.

15          A.        Okay. We've been together  
16          almost a year.

17          Q.        And what is your current  
18          occupation?

19          A.        I'm a writer.

20          Q.        And what do you write?

21          A.        Just stuff, you know? Just  
22          about factual stuff. You know, just a  
23          bit of this, bit of that.

24          Q.        Have you been paid for any  
25          of your writing?

1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.  It's more of a hobby,  
3 really.

4           Q.       Are you employed?

5           A.       Nope.

6           Q.       Do you have any source of  
7 income?

8           A.       My partner --

9                   MR. GUIRGUIS:  I'm going to  
10 object to that.  Income is out.

11                   You don't have to answer  
12 that.

13           Q.       Do you have any source of  
14 income?

15                   MR. GUIRGUIS:  I just  
16 objected to that.  You don't have  
17 to answer.

18                   MS. MENNINGER:  Is there a  
19 privilege you're asserting?

20                   MR. GUIRGUIS:  I'm not sure  
21 what the relevance is, and I'm  
22 not going to allow --

23                   MS. MENNINGER:  Do you  
24 believe that relevance is a  
25 proper objection during a

1                   HIGHLY CONFIDENTIAL AEO

2                   deposition?

3                   MR. GUIRGUIS: I believe  
4                   that if you go far afield with  
5                   this witness, that the judge is  
6                   not going to appreciate it, and  
7                   that I'm not going to just sit  
8                   here and be a potted plant and  
9                   allow her to answer any questions  
10                  on any subject that you see fit.

11                  MS. MENNINGER: On  
12                  relevance? You're instructing  
13                  her not to answer on a relevance  
14                  objection? Is that what you're  
15                  saying?

16                  MR. GUIRGUIS: I just  
17                  objected.

18                  MS. MCCAWLEY: I'm going to  
19                  object on behalf of the  
20                  plaintiff, Virginia Giuffre, to  
21                  the extent that you're requesting  
22                  from a nonparty financial  
23                  information, which is not allowed  
24                  under New York law.

25                  MS. MENNINGER: I have asked

1           HIGHLY CONFIDENTIAL AEO  
2           her whether she has any source of  
3           income, and you're going to  
4           object --

5           MS. MCCAWLEY:   Yes.

6           MS. MENNINGER:   -- and  
7           instruct her not to answer as  
8           well?

9           MS. MCCAWLEY:   I'm not  
10          instructing her not to answer.  
11          I'm just making a record.

12          MR. GUIRGUIS:   It's  
13          financial information --

14          MS. MENNINGER:   And whether  
15          she has a financial motive is  
16          relevant.

17          Q.        So I'm going to ask you a  
18          last time:   Do you have any source of  
19          income?

20          MR. GUIRGUIS:   I'm going to  
21          instruct you again not to answer.

22          Q.        Has any of your writing been  
23          published by anyone?

24          A.        No.

25          Q.        Have you sought to have your

1                   HIGHLY CONFIDENTIAL AEO

2           A.        About 11 hours in total.

3           Q.        When is the first time that  
4 you met Mr. Guirguis?

5                   MR. GUIRGUIS:  Objection.

6                   MS. MCCAWLEY:  You can  
7 answer.

8                   MR. GUIRGUIS:  You can  
9 answer.

10          A.        Yesterday.

11          Q.        You met Mr. Guirguis  
12 yesterday?  Was that your answer?

13          A.        Yes.

14          Q.        And who is paying for  
15 Mr. Guirguis's fees, if you know?

16          A.        I have a pro-bono  
17 arrangement.

18          Q.        Do you know if he's  
19 receiving money from anyone else in  
20 exchange for representing you?

21          A.        No.

22          Q.        No, you don't know, or no,  
23 he is not?

24          A.        I don't know.

25          Q.        How many hours have you

1                   HIGHLY CONFIDENTIAL AEO

2       spent with Ms. McCawley?

3           A.       Can I just clarify that  
4       question? Does that mean on the  
5       phone? Like what are you referring  
6       to, in person or --

7           Q.       Either one. How many hours,  
8       how much time have you spent with  
9       Ms. McCawley in person?

10          A.       I met with Ms. McCawley for  
11       the first time in person yesterday,  
12       but I've spent -- yeah, we've been --  
13       Ms. McCawley was the first person I  
14       actually spoke to.

15          Q.       And how many hours have you  
16       spent with her on the phone?

17          A.       Many, many hours.

18          Q.       Approximately how many?

19          A.       I don't know.

20          Q.       Five?

21                   MR. GUIRGUIS: Objection.

22          A.       More than five.

23          Q.       Ten?

24                   MR. GUIRGUIS: Objection.

25          Q.       Ten?

1                   HIGHLY CONFIDENTIAL AEO

2           A.       Well, 10, 15. She's been  
3 with me the whole way since when I  
4 came forward, so she's been a very  
5 prominent person.

6           Q.       And when did you first speak  
7 with her on the phone?

8           A.       I think it was --

9           Q.       Without telling me what you  
10 said.

11          A.       I think it was November.

12          Q.       November what?

13          A.       I can't remember the date.

14          Q.       Early November? Late  
15 November?

16                   MR. GUIRGUIS: Objection.

17          A.       I can't remember.

18          Q.       Was she speaking to you on  
19 your cell phone or a landline?

20          A.       Cell phone.

21          Q.       A mobile number or a  
22 landline?

23          A.       A cell phone.

24          Q.       Okay. And what's that cell  
25 phone number?

1                   HIGHLY CONFIDENTIAL AEO

2           A.        I don't have it anymore.

3           Q.        That's okay.  What's the  
4 cell phone number?

5           A.        I actually don't know.  I  
6 can't remember my cell phone number.  
7 I don't have anything with me, so I  
8 can't remember that number offhand.

9           Q.        How long did you have that  
10 cell phone?

11          A.        About eight months.

12          Q.        What happened to it?

13          A.        I got rid of it.

14          Q.        Why?

15          A.        Because I fear for my life  
16 because of Jeffrey Epstein and  
17 Ghislaine Maxwell.

18          Q.        What did you do with it?

19          A.        I sold it.

20          Q.        When?

21          A.        November.

22          Q.        Before or after you first  
23 spoke with Ms. McCawley?

24          A.        Before.

25          Q.        So then how did you speak

1                   HIGHLY CONFIDENTIAL AEO

2       with Ms. McCawley over the phone?

3           A.       On my partner's cell phone.

4           Q.       What's his cell phone  
5       number?

6                   MS. MCCAWLEY:  Objection.

7           What's the relevance of her  
8       partner's cell phone?

9                   Again, this is irrelevant.  
10          It's harassing.  It's -- you're  
11         seeking information to be able  
12         to -- the witness has already  
13         expressed fear about her --  
14         people currently going after her.  
15         So we would object to that  
16         intimidation of a nonparty  
17         witness.

18          Q.       What is your partner's cell  
19       phone number?

20                   MR. GUIRGUIS:  I'm directing  
21         the witness not to answer.

22          Q.       How many hours have you  
23       spent speaking with Mr. Pottinger?

24          A.       I've been speaking to  
25       Mr. Pottinger from November.

1                   HIGHLY CONFIDENTIAL AEO

2           any agreements regarding writing a  
3           book --

4           A.        No.

5           Q.        -- about your experience?

6                    You have to wait for me to  
7           finish my question.

8                    Have you had any agreements  
9           with your lawyers about media rights  
10          in any form?

11                   MR. GUIRGUIS:  Objection to  
12          the extent that you're asking  
13          about communications with the  
14          attorneys.

15                   MS. MENNINGER:  I'm asking  
16          about her arrangement with her  
17          attorneys, which is not  
18          privileged.

19          A.        Can you please repeat the  
20          question.

21          Q.        Have you reached any  
22          agreement with your attorneys  
23          regarding media rights for your story?

24          A.        No.

25          Q.        Have you talked to anyone

1                   HIGHLY CONFIDENTIAL AEO  
2       about publishing anything relating to  
3       your story?

4           A.       Can you repeat the question,  
5       please.

6                   MS. MENNINGER:   Can you read  
7       it back.

8                   (Requested portion of the  
9       record was read back.)

10          A.       Yes, I have.

11          Q.       Who have spoken to?

12          A.       The New York Post.

13          Q.       Who at the New York Post?

14          A.       Maureen Callahan.

15          Q.       And when did you speak with  
16       her?

17          A.       I think it was later  
18       October.

19          Q.       Have you spoken with her  
20       since?

21          A.       No.

22          Q.       And how long did you speak  
23       to her?

24          A.       I spoke to her for, gosh,  
25       about 30 minutes on the phone once.

1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And what was -- what did you  
3 tell her in your phone call?

4           A.       I told her what Jeffrey  
5 Epstein and Ghislaine Maxwell did to  
6 me and the other girls.

7           Q.       Did she give you any money  
8 in exchange for that interview?

9           A.       No.

10          Q.       Did she publish anything  
11 related to that interview?

12          A.       No.

13          Q.       How did you get in touch  
14 with Ms. Callahan?

15          A.       I emailed after I read an  
16 article that she had written about  
17 Jeffrey Epstein, and the last sentence  
18 was -- it was on the 16th of October,  
19 and one of the last sentences I  
20 remember was, will we ever know the  
21 true extent of Jeffrey Epstein's  
22 victims. And I wrote her after that  
23 because, well, it still continues,  
24 doesn't it.

25          Q.       Where is the email that you

1                   HIGHLY CONFIDENTIAL AEO

2       wrote her?

3           A.       It's on a -- it's on my  
4       computer.

5           Q.       Okay.    In your Yahoo  
6       account?

7           A.       Yes.

8           Q.       Did you have any agreement  
9       with her to have any additional  
10      conversation?

11          A.       Yes.

12          Q.       And what was that agreement?

13          A.       It wasn't an agreement per  
14      such.    What actually happened was I  
15      came forward.    As soon as I came  
16      forward, there was -- where I live in  
17      Barcelona, there's quite a lot -- it's  
18      quite busy traffic with people.

19                    I came forward to Maureen  
20      Callahan.    I wanted to tell my story,  
21      and I want to run a campaign in which  
22      all the girls that have been abused by  
23      Ghislaine and Jeffrey can come  
24      forward.    And I wanted to run a  
25      campaign with the New York Post to get

1                   HIGHLY CONFIDENTIAL AEO  
2       these girls to have the courage to  
3       come forward, because I know a lot of  
4       them are frightened like myself.

5                   The email correspondence I  
6       had with Maureen Callahan, she was  
7       going away or something and she was  
8       going to write a piece in the New York  
9       Post about my story. During that time  
10      it was the elections, so there was a  
11      lot more other things going on.

12                  There were two people  
13      following me after I came forward to  
14      Maureen Callahan. I went to -- I  
15      walked downstairs. I walked around --  
16      I have a usual routine that I do. In  
17      the morning I went out, I saw the same  
18      two people. Later on that afternoon,  
19      I saw the same two people again. I  
20      was frightened. I'm frightened for my  
21      life, absolutely frightened. So there  
22      you go.

23                  So that's what I was --  
24      communication stopped between Maureen  
25      Callahan and I. I got really angry

1                   HIGHLY CONFIDENTIAL AEO  
2       with Maureen because she had obviously  
3       told someone.   Being the New York  
4       Post, so, you know.

5           Q.        So you had an email to  
6       Ms. Callahan and an email back from  
7       her?

8           A.        Yes.

9           Q.        More than one?

10          A.        Yes.

11          Q.        How many?

12          A.        I can't remember.

13          Q.        More than ten or less than  
14       ten?

15          A.        Less than ten.

16          Q.        And you had one phone call  
17       with her or more than one?

18          A.        Just one.

19          Q.        And it lasted about 30  
20       minutes?

21          A.        About that.

22          Q.        And was that also on the  
23       cell phone that you got rid of?

24          A.        That was on my partner's  
25       cell phone.

1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And what had you read in the  
3 press that caused you to get in touch  
4 with Ms. Callahan?

5                   MS. MCCAWLEY:  Objection to  
6 form.  Go ahead.

7           A.       You can read the article  
8 yourself.  It's on the 16th of  
9 October, there's an article in the New  
10 York Post written by Maureen Callahan.  
11 You can read it.  And that's what  
12 inspired me to come forward.

13          Q.       What do you recall about  
14 that article?

15          A.       Oh, I can't remember.  The  
16 one thing I do remember is the last  
17 sentence of the article, which has  
18 stuck with me and quite prominent, and  
19 that is, will we ever know the true  
20 extent of Jeffrey Epstein's victims.

21          Q.       Do you recall anything else  
22 about the article?

23          A.       It's just the same.  When I  
24 read the article, the stuff that I had  
25 experienced myself with Jeffrey, it's

1                   HIGHLY CONFIDENTIAL AEO  
2       just same old stuff, just continuing.  
3       I thought he had stopped abusing  
4       girls.

5           Q.       What do you recall reading a  
6       article that Jeffrey Epstein was  
7       doing?

8           A.       I can't remember.

9           Q.       Anything at all?

10          A.       You can read the article. I  
11       can't remember.

12          Q.       The question is what you  
13       remember.

14          A.       I can't remember.

15          Q.       You remember nothing else  
16       about the article --

17                   MS. MCCAWLEY: Asked and  
18       answered objection.

19          Q.       -- except it was related to  
20       Jeffrey Epstein and it ended with the  
21       sentence that you've described?

22                   MS. MCCAWLEY: Objection,  
23       asked and answered.

24          A.       Yes.

25          Q.       What do you know about other

1                   HIGHLY CONFIDENTIAL AEO

2       I had to regularly pop in to see him  
3       and Ghislaine. And Ghislaine would  
4       often check how I was doing and blah,  
5       blah, blah, etcetera.

6           Q.       What were you doing to  
7       prepare for your college application?

8           A.       I had to write an essay.

9           Q.       When did you --

10          A.       Also, I had to do -- like,  
11       you know how you apply for college  
12       applications; you've got your  
13       application forms and such. So it was  
14       more admin.

15          Q.       And you were going to  
16       Jeffrey's office to work on your  
17       forms?

18          A.       Yes. And to just say hi. I  
19       was -- well, I never went on my own  
20       accord. I was either invited or told  
21       to be there by either Ghislaine or  
22       Jeffrey. I also went to the offices  
23       on a number of occasions for private  
24       legal matter.

25          Q.       What's the private legal

1                   HIGHLY CONFIDENTIAL AEO

2           matter?

3                   MR. GUIRGUIS:   Objection.

4           I'm going to direct you not to  
5           answer if it's unrelated to this  
6           case.

7           Q.       Was there an attorney  
8           present?

9           A.       Yes.

10          Q.       What was the name of the  
11          attorney who was present?

12          A.       Alan Dershowitz.

13          Q.       So I was asking about the  
14          second time you met Ghislaine.  It was  
15          at Jeffrey's office in New York?

16          A.       Yes.

17          Q.       How did you come to be in  
18          Jeffrey's office in New York where you  
19          met Ghislaine the second time?

20          A.       I was told to be there.

21          Q.       Who told you to be there?

22          A.       I think it was Ghislaine.

23          Q.       How did Ghislaine tell you  
24          to be there?

25          A.       I can't remember if it was

1                   HIGHLY CONFIDENTIAL AEO

2       or the specific words used.

3                   But it was surrounding my  
4       FIT application and an essay I had to  
5       write, and they both proofread my FIT  
6       application as well.

7           Q.       And did they both read your  
8       essay?

9           A.       Yes, they did.

10          Q.       When did you write that  
11       essay?

12          A.       I can't remember.

13          Q.       Before you went to South  
14       Africa?

15          A.       Yes.

16          Q.       Do you know what the  
17       application deadline was?

18          A.       I don't know. I don't know.  
19       I can't remember.

20          Q.       When did you meet Alan  
21       Dershowitz?

22          A.       I don't remember the  
23       specific date. It was a few months  
24       after I had been here in New York.

25          Q.       Was it after you had gone to

1                   HIGHLY CONFIDENTIAL AEO

2    the island?

3           A.       Yes.

4           Q.       Do you know what time of  
5    year?

6           A.       I mean, I think it was  
7    before winter.

8           Q.       Well, you were here in the  
9    fall.

10          A.       Yeah.

11          Q.       And you left in the winter?

12          A.       Yeah. I left in May.

13          Q.       So did you meet him before  
14   you went to South Africa?

15          A.       Yes.

16          Q.       Well, let's be clear. You  
17   were here until you went to South  
18   Africa, and you left for a while and  
19   then you came back, right?

20          A.       Mm-hmm.

21          Q.       How long were you gone?

22          A.       I think about three -- about  
23   three weeks.

24          Q.       So you met him before you  
25   went to South Africa?

1                   HIGHLY CONFIDENTIAL AEO

2           A.        Yes.

3           Q.        And tell me about when you  
4 met Alan.

5           A.        I first met Alan at the  
6 offices.

7           Q.        And tell me what happened.

8           A.        I can't really tell you what  
9 happened, because it's about a legal  
10 matter.

11          Q.        Was he your lawyer?

12          A.        He was going to be assigned  
13 to be my lawyer.

14          Q.        Assigned to be your lawyer?

15          A.        Through Jeffrey's  
16 instruction.

17          Q.        Okay. Was he your lawyer?

18                   MS. MCCAWLEY: Objection,  
19 asked and answered.

20                   MS. MENNINGER: I don't know  
21 if there's a privilege.

22                   MR. GUIRGUIS: There's a  
23 privilege whether he was retained  
24 or not, right? I mean, if you're  
25 at a cocktail party and you speak

1           HIGHLY CONFIDENTIAL AEO  
2           to a lawyer, you know that  
3           conversation is privileged.  
4           So...

5           MS. MENNINGER: Well, I  
6           don't, actually.

7           MR. GUIRGUIS: You're free  
8           to research it.

9           MS. MENNINGER: I will ask  
10          questions, then, to try to  
11          establish whether or not there's  
12          a good-faith basis.

13          Q.       Did you approach Alan  
14          Dershowitz for the purpose of seeking  
15          legal advice?

16          A.       I was introduced to Alan.

17          Q.       By whom?

18          A.       Jeffrey Epstein.

19          Q.       On what day?

20          A.       I don't recall what day.

21          Q.       Was it related to some event  
22          that had occurred just before that?

23          A.       Yes, that's correct.

24          Q.       Were you in touch with any  
25          law enforcement authorities?

1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       Hmm?

4           A.       No.

5           Q.       Was Jeffrey Epstein in the  
6 room when you were speaking with Alan  
7 Dershowitz?

8           A.       Yes.

9           Q.       Did Jeffrey Epstein overhear  
10 your conversation with Alan  
11 Dershowitz?

12          A.       Yes.

13          Q.       What did you talk about with  
14 Alan Dershowitz?

15                   MR. GUIRGUIS:  Objection.

16          A.       It --

17                   MR. GUIRGUIS:  Objection.  I  
18 direct the witness not to answer.

19                   MS. MENNINGER:  A third  
20 party was in the room; you've  
21 heard that, Counsel.  And you  
22 know that means that's a waiver.

23                   MS. MCCAWLEY:  No.  I mean,  
24 they would have been involved --  
25 we don't know what the situation

1           HIGHLY CONFIDENTIAL AEO  
2           is. They could have been  
3           involved together. There could  
4           be a number of reasons why  
5           Jeffrey had some sort of common  
6           interest with her with that.

7           Q. Did you sign a common  
8           interest agreement with Jeffrey?

9           MR. GUIRGUIS: Objection.  
10          Do not answer.

11          MS. MENNINGER: Whether she  
12          had a common interest agreement  
13          with Jeffrey, you're instructing  
14          her not to answer; is that right,  
15          Counsel?

16          MR. GUIRGUIS: Do you have  
17          realtime in front of you,  
18          Counsel?

19          MS. MENNINGER: I don't.

20          MR. GUIRGUIS: You don't?  
21          You can borrow mine.

22          MS. MENNINGER: I don't want  
23          it. Thank you.

24          MR. GUIRGUIS: Okay.

25          Q. Anyone else in the room when

1                   HIGHLY CONFIDENTIAL AEO

2                   BY MS. MENNINGER:

3           Q.       Going back to your first  
4 conversation with Alan Dershowitz, at  
5 any point in that conversation, had  
6 Mr. Dershowitz agreed to act as your  
7 lawyer?

8           A.       Yes.

9           Q.       Did he do anything in terms  
10 of contacting anyone on your behalf?

11           MR. GUIRGUIS:  Objection.

12                   Do not answer.

13           Q.       What was the specific legal  
14 matter that you were seeking  
15 representation for?

16           MS. MCCAWLEY:  Objection.

17           MR. GUIRGUIS:  Objection.

18                   Do not answer.

19           Q.       What did you understand the  
20 purpose of Jeffrey Epstein being in  
21 the room for during that conversation?

22           A.       Jeffrey was there to support  
23 me and Jeffrey was looking after me.

24           Q.       When you engaged in sexual  
25 conduct with Alan Dershowitz, did you

1                   HIGHLY CONFIDENTIAL AEO  
2    photographs contained in Defendant's  
3    Exhibit 6?

4           A.        Yes, I do.

5           Q.        What are they?

6           A.        They are photos of Jeffrey's  
7    island and the trip in December.

8           Q.        Who took those photos?

9           A.        ██████ ██████ took these specific  
10   photos.

11          Q.        And when you were asked to  
12   provide these to us, where did you  
13   locate them?

14          A.        I had a disk that ██████ ██████  
15   had given me as a present and memento  
16   of that holiday.

17          Q.        Where is that disk now?

18          A.        In Spain.

19          Q.        Do you see in the corner  
20   there are some little numbers with  
21   your last name and then some --

22          A.        Oh, yeah, okay.

23          Q.        I'm only showing you that so  
24   we can together go through to some.

25          A.        Okay.

1                   HIGHLY CONFIDENTIAL AEO

2           Q.       So is Defendant's Exhibit 7  
3 the second batch that you were  
4 referring to?

5           A.       Yes.

6           Q.       Okay. So I'm just trying to  
7 help be clear.

8                   Defendant's Exhibit 6, you  
9 believe were all given to you by [REDACTED]  
10 [REDACTED] on a disk?

11          A.       Well, there's a lot of  
12 photos here. So I took some, I had  
13 some hard copies, and they're all  
14 actually all together, so...

15          Q.       Okay, that's fine.

16          A.       Yeah. I don't want to be  
17 unclear on which exhibit is which.  
18 There's hundreds here.

19          Q.       So the photographs of [REDACTED]  
20 [REDACTED], you're saying were taken by  
21 [REDACTED] [REDACTED], that we were looking at in  
22 RANSOME 24?

23          A.       Well, I can recheck the disk  
24 and then I can actually tell you  
25 exactly which ones he took, but I

1                   HIGHLY CONFIDENTIAL AEO  
2       can't recall every single photo on  
3       ██████████'s disk. But there were  
4       multiple photos that were produced  
5       from myself as well.

6           Q.       Okay. I will just ask you  
7       about a few.

8           A.       Okay.

9           Q.       RANSOME 24 is one that you  
10      said was -- of ██████████ ██████████, was one  
11      you said you thought ██████████ ██████████ had  
12      taken?

13          A.       Yes.

14          Q.       If you could turn to RANSOME  
15      40. And these are in order, so  
16      hopefully that will be easy.

17          A.       Okay. Mm-hmm.

18          Q.       Who is represented in this  
19      photograph?

20          A.       That's ██████████.

21          Q.       And where is ██████████ in this  
22      photograph, if you know?

23          A.       This is by the beach.  
24      There's like -- there's like a small  
25      beach, like there's a beach house on

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C E R T I F I C A T E

STATE OF NEW YORK )  
:

COUNTY OF NEW YORK )

I, Jeremy Richman, a Notary Public  
within and for the State of New York, do hereby  
certify:

THAT SARAH RANSOME, the witness  
whose deposition is hereinbefore set forth, was  
duly sworn by me and that such deposition is a  
true record of the testimony given by such  
witness.

I further certify that I am not  
related to any of the parties to this action by  
blood or marriage; and that I am in no way  
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 19th day of February 2017.



*[Signature]*  
-----  
Jeremy Richman