

EXHIBIT 2
(File Under Seal)

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

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

Case No:

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

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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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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

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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.

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2 Q. When in November?

3 A. I can't remember.

4 Q. On your same cell phone that
5 you got rid of?

6 A. No, on my partner's cell
7 phone.

8 Q. And when did you first meet
9 Mr. Pottinger in person?

10 A. It was in the beginning of
11 January.

12 Q. And where was that meeting?

13 A. Barcelona.

14 Q. Where in Barcelona?

15 A. Barcelona. It's Barcelona.
16 We meet -- I can't remember the area.

17 Q. In a restaurant? In a
18 hotel? In an office?

19 A. In a hotel.

20 Q. And how long did you spend
21 with Mr. Pottinger on that occasion?

22 A. Two days.

23 Q. How many hours over the two
24 days?

25 A. Gosh, about 16.

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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

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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

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[REDACTED]

19

[REDACTED]

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2 A. Yeah, we -- yeah. He was
3 really intimate all the time. We
4 had -- multiple times. I can't tell
5 you how many times I've slept with
6 Jeffrey. I mean, we were on rotation.
7 Every single day, it was -- sometimes
8 twice a day I was called.

9 You know, Ghislaine, [REDACTED]
10 [REDACTED] -- you know, it was -- yeah. I
11 mean, how -- we were on rotation
12 pretty much the whole time I was here.

13 Q. And when you say you were on
14 rotation, you mean you were having sex
15 with Jeffrey multiple times per day?

16 A. No. As in when I was
17 finished, another girl was called by
18 Ghislaine. And when they had
19 finished, another girl was called.

20 Q. How do you know that another
21 girl was called by Ghislaine?

22 A. Because I was there, and I
23 saw it and heard it with all my
24 senses. I saw Ghislaine call another
25 girl, and she called me herself, to go

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2 give Jeffrey Epstein a sexual massage.

3 Q. What do you mean by call? I
4 guess I'm thinking like telephone.

5 That may be my --

6 A. No. As in going up to the
7 person and going, Jeffrey wants to see
8 you in his bedroom, which meant it's
9 your turn to be abused. That kind of
10 thing.

11 Q. And this is on the island?

12 A. This is on the island.

13 Q. You heard -- as soon as you
14 were done with Jeffrey, you heard
15 Ghislaine go up to another girl and
16 say, it's your turn with Jeffrey?

17 A. So every single day, I
18 mean -- so I don't know how quickly
19 Jeffrey's sperm bank fills up. I
20 mean, I know guys can normally cum
21 once or twice a day, but Jeffrey's not
22 a normal person.

23 So, I mean, our rotation
24 changed every day that specific trip
25 we had in December.

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2 MR. GUIRGUIS: Okay. So on
3 the record -- we can carry on the
4 conversation, certainly, off the
5 record.

6 But while we're on the
7 record, I will say that my
8 understanding is that those
9 documents were all produced to
10 you, including all the emails
11 that you asked her about, and
12 where are the missing emails, and
13 she kept saying they'd been
14 produced to her attorneys. My
15 understanding is that the
16 attorneys did provide them to
17 defense counsel.

18 MS. MENNINGER: Well,
19 there's a current passport that
20 we know was not produced, there
21 is an FIT application that we
22 know was not produced, and I
23 believe there are emails that
24 were not produced.

25 And I'm happy to have the

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2 conversation continue off the
3 record, but I'm telling you those
4 are some of my recollections.

5 MR. GUIRGUIS: Okay. And to
6 be clear so that I'm not
7 misrepresenting, I see that I
8 said there were documents and the
9 emails. I meant to clarify, as
10 in the emails I know were
11 produced.

12 I can't speak to any other
13 documents that you might want to
14 raise a dispute about. But with
15 respect to the emails that you
16 said, my understanding, at least
17 as I sit here, is that they were
18 produced.

19 That said, I think we can go
20 off the record and resolve any
21 other issues between counsel and
22 I.

23 (Time noted: 6:34 p.m.)

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