

**EXHIBIT 5**  
**(Filed Under Seal)**

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 Q. Okay. Great.

2 All right. Do you know a female by the  
3 name of Ghislaine Maxwell?

4 A. Yes.

5 Q. And when did you first meet Ms. Maxwell?

6 A. 2001. March probably. End of  
7 February/beginning of March.

8 Q. And how did you meet her?

9 A. She approached me while I was on campus at  
10 Palm Beach Atlantic College.

11 Q. And what happened when she approached you?

12 A. She asked me if I could tell her how to  
13 find someone that would come and work at her house.  
14 She wanted to know if there was, like, a bulletin  
15 board or something that she could post, that she was  
16 looking for someone to hire.

17 Q. And what did you discuss with her?

18 A. I told her where she could go to -- you  
19 know, to put up a listing. And then she asked me if  
20 I knew anyone that would be interested in working  
21 for her.

22 Q. Did she describe what that work was going  
23 to be?

24 A. She explained that she lived in Palm Beach  
25 and didn't want butlers because they're too stuffy.

1 And so she just liked to hire girls to work at the  
2 house, answer phones, get drinks, do the job a  
3 butler would do.

4 Q. And did she tell you what she would pay  
5 for that kind of a job?

6 A. At that moment, no, but later in the day,  
7 yes.

8 Q. And what did she say?

9 A. Twenty dollars an hour.

10 Q. Was there anybody else with Ms. Maxwell  
11 when you met her?

12 A. There was another woman with her. I don't  
13 recall her or what she looks like or how old she  
14 was.

15 Q. And what happened next?

16 A. And then she asked me if I would be  
17 interested in working for her. And she told me that  
18 she was -- I could trust her and that I could jump  
19 in her car and go check out the house at that moment  
20 if I wanted.

21 And so I said, Sure, let's do it, and went  
22 to her home with her.

23 Q. And where was that home?

24 A. In Palm Beach.

25 Q. And did she describe that home as being

1 Q. And how long did you work in that position  
2 answering phones and doing --

3 A. Just that one day.

4 Q. Just that one day.

5 And did your duties change?

6 A. Well, the next time she called me, she  
7 asked me if I wanted to come over and make \$100 an  
8 hour rubbing feet.

9 Q. And what did you think of that offer?

10 A. I thought it was fantastic.

11 Q. And did you come over to the house for  
12 that purpose?

13 A. Yes.

14 Q. And when you came over to the house, was  
15 Maxwell present?

16 A. I don't recall.

17 Q. And what happened that second time you  
18 came to the house?

19 A. At that point, I met Emmy Taylor, and she  
20 took me up to Jeffrey's bathroom and he was present.  
21 And her and I both massaged Jeffrey. She was  
22 showing me how to massage.

23 And then she -- he took -- he got off the  
24 table, she got on the table. She took off her  
25 clothes, got on the table, and then he was showing

1 me moves that he liked. And then I took my clothes  
2 off. They asked me to get on the table so I could  
3 feel it. Then they both massaged me.

4 Q. So it was more than a foot massage at that  
5 point?

6 A. Yeah, it was mostly, like, legs and back.

7 Q. Was everybody in the room without clothes  
8 on?

9 A. When they were on the massage table, yes.

10 Q. Did they -- when they got off the massage  
11 table to perform the massage, did they dress or  
12 did --

13 A. Yes.

14 Q. They dressed.

15 And do you recall who paid you for that  
16 first day that you did the massages?

17 A. I don't recall.

18 Q. Do you recall whether Maxwell was at the  
19 house during that first day when you were doing the  
20 massage with Emmy and Jeffrey?

21 MS. MENNINGER: Objection, asked and  
22 answered.

23 BY MS. McCAWLEY:

24 Q. You can answer.

25 A. I don't recall.

1           A.    No, I only -- to you, I said that to you.  
2    I just saw her as perhaps someone who may not have  
3    had a strong family, and they took her under their  
4    wing.

5           Q.    Now, you mentioned remembering going to  
6    Atlantic City.

7                    Did you go -- where did you go after  
8    Atlantic City?

9           A.    Once we landed in New York, Emmy and I  
10   went in a car and drove around the city for a half  
11   hour or so, just to see some of the city.

12          Q.    And then where did you go after doing the  
13   sightseeing?

14          A.    We went to the townhouse on East 71st.

15          Q.    And can you describe that location for me?

16          A.    Sure.   Between Madison and Park.   I think  
17   the address might have been 9 East 71st Street.

18          Q.    And who owned that home?

19          A.    As far as I knew, Epstein.

20          Q.    Can you describe for me physically what --

21          A.    Palatial.   When you walk up, it looks like  
22   a normal door to a townhouse, and when you walk  
23   in -- I thought there were four floors.   I heard  
24   there were seven floors.   I didn't see them all.

25          Q.    And do you recall who, if anybody, was at

1 Jeffrey's home when you arrived?

2 A. Yes. When I first walked in the door, it  
3 was just myself, and Ghislaine headed for the  
4 staircase and said -- told me to come up to the  
5 living room.

6 Q. And what happened at that point, when you  
7 came up to the living room?

8 A. I came up and saw Virginia, Jeffrey,  
9 Prince Andrew, Ghislaine in the room.

10 Q. And did you meet Prince Andrew at that  
11 time?

12 A. Yes.

13 Q. And what happened next?

14 A. At one point, Ghislaine told me to come  
15 upstairs, and we went into a closet and pulled out  
16 the puppet, the caricature of Prince Andrew, and  
17 brought it down. And there was a little tag on the  
18 puppet that said "Prince Andrew" on it, and that's  
19 when I knew who he was.

20 Q. And did -- what did the puppet look like?

21 A. It looked like him. And she brought it  
22 down and presented it to him; and that was a great  
23 joke, because apparently it was a production from a  
24 show on BBC. And they decided to take a picture  
25 with it, in which Virginia and Andrew sat on a



1 couch. They put the puppet on Virginia's lap, and I  
2 sat on Andrew's lap, and they put the puppet's hand  
3 on Virginia's breast, and Andrew put his hand on my  
4 breast, and they took a photo.

5 Q. Do you remember who took the photo?

6 A. I don't recall.

7 Q. Did you ever see the photo after it was  
8 taken?

9 A. I did not.

10 Q. And Ms. Maxwell was present during the --  
11 was Ms. Maxwell present during that?

12 A. Yes.

13 Q. What happened next?

14 A. The next thing I remember is just being  
15 shown to which room I was going to be staying in.

16 Q. When you exited the room that you were in  
17 where the picture was taken, do you recall who  
18 remained in that room?

19 A. I don't.

20 Q. Do you recall seeing Virginia exit that  
21 room?

22 A. I don't.

23 Q. During this trip to New York, did you have  
24 to perform any work when you were at the New York  
25 house?

1           A.    I performed at least one massage that I  
2 recall.

3           Q.    And who instructed you to give that  
4 massage?

5           A.    Jeffrey.

6           Q.    And can you describe for me what happened  
7 during that massage?

8           A.    Near the end, he asked me to rub his  
9 nipples while he masturbated.

10          Q.    And did that take place?

11          A.    It did not.

12          Q.    And why not?

13          A.    I was not comfortable with it.  And so I  
14 left the room.

15          Q.    Did you have any -- did you say anything  
16 to him before leaving the room?

17          A.    I believe I said, "I'm done."

18          Q.    Do you recall what his reaction was to  
19 that?

20          A.    I do not.  At the time, at that moment, I  
21 do not.

22          Q.    Did you recall later what --

23          A.    Well, we had a conversation a little  
24 later, talking about his expectations, and that was  
25 the conversation where he said that the next trip

1 Q. Did you observe her to be young when you  
2 met her?

3 MS. MENNINGER: Objection, vague as to  
4 time.

5 THE WITNESS: All of the women were  
6 generally young. I did not know the ages of  
7 really anyone, so...

8 BY MS. McCAWLEY:

9 Q. How many massages did Jeffrey receive on  
10 average in a given day?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Three a day.

13 BY MS. McCAWLEY:

14 Q. Let me back up for a moment.

15 How long did you work for Jeffrey and  
16 Ghislaine?

17 MS. MENNINGER: Objection, leading and  
18 foundation.

19 THE WITNESS: I believe it was five years,  
20 2001 to 2006.

21 BY MS. McCAWLEY:

22 Q. And how many massages did Epstein receive  
23 per day on average?

24 MS. MENNINGER: Objection, foundation.

25 THE WITNESS: Three.

1 BY MS. McCAWLEY:

2 Q. Were the massages performed by the same  
3 girl or different females?

4 A. Different.

5 MS. MENNINGER: Objection, foundation.

6 BY MS. McCAWLEY:

7 Q. What did the females who performed the  
8 massages look like?

9 MS. MENNINGER: Objection, foundation.

10 THE WITNESS: They all looked different.  
11 Some of them were ethnic, some were blond, some  
12 were short, some were tall. Everyone was thin.

13 BY MS. McCAWLEY:

14 Q. Were the girls who performed the massages  
15 young or old?

16 MS. MENNINGER: Objection, foundation.

17 THE WITNESS: I don't recall anyone being  
18 old.

19 BY MS. McCAWLEY:

20 Q. Do you recall anybody being over the age  
21 of, say, 25?

22 MS. MENNINGER: Objection, form.

23 THE WITNESS: Yeah, I believe there was  
24 probably a few women that were older than 25.

25 MS. MENNINGER: I'm sorry. I get a chance

1 to object and then you can still answer. No  
2 one is going to stop you from answering. I  
3 just need to get the objection on the record,  
4 in the same way she needs to be able to talk  
5 before you. My apologies. I'm not trying to  
6 cut you off, but I am supposed to get it in  
7 before you answer.

8 BY MS. McCAWLEY:

9 Q. Did Jeffrey ever tell you why he received  
10 so many massages from so many different girls?

11 MS. MENNINGER: Objection, hearsay.

12 BY MS. McCAWLEY:

13 Q. You can answer.

14 A. He explained to me that, in his opinion,  
15 he needed to have three orgasms a day. It was  
16 biological, like eating.

17 Q. And what was your reaction to that  
18 statement?

19 A. I thought it was a little crazy.

20 Q. And what did -- do you recall what -- when  
21 you observed the other females giving massages, do  
22 you recall what they would dress like? Did they  
23 wear scrubs or did they typically wear normal  
24 clothes?

25 A. Normal clothes.

1 MS. MENNINGER: Objection, leading.

2 BY MS. McCAWLEY:

3 Q. Do you believe that from your  
4 observations, Maxwell and Epstein were boyfriend and  
5 girlfriend?

6 A. Initially, yes.

7 Q. Did Maxwell ever share with you whether it  
8 bothered her that Jeffrey had so many girls around?

9 MS. MENNINGER: Objection, leading,  
10 hearsay.

11 THE WITNESS: No. Actually, the opposite.

12 BY MS. McCAWLEY:

13 Q. What did she say?

14 A. She let me know that she was -- she would  
15 not be able to please him as much as he needed and  
16 that is why there were other girls around.

17 Q. Did there ever come a time -- did you ever  
18 take a photography class in school?

19 A. Yes.

20 Q. And did there ever come a time when  
21 Maxwell offered to buy you a camera?

22 A. Yes.

23 MS. MENNINGER: Objection, leading.

24 BY MS. McCAWLEY:

25 Q. Did Maxwell ever offer to buy you a

1 camera?

2 MS. MENNINGER: Objection, leading.

3 THE WITNESS: Yes.

4 BY MS. McCAWLEY:

5 Q. Was there anything you were supposed to do  
6 in order to get the camera?

7 MS. MENNINGER: Objection, leading.

8 THE WITNESS: I did not know that there  
9 were expectations of me to get the camera until  
10 after. She had purchased the camera for me,  
11 and I was over there giving Jeffrey a massage.  
12 I did not know that she was in possession of  
13 the camera until later.

14 She told me -- called me after I had left  
15 and said, I have the camera for you, but you  
16 cannot receive it yet because you came here and  
17 didn't finish your job and I had to finish it  
18 for you.

19 BY MS. McCAWLEY:

20 Q. And did you -- what did you understand her  
21 to mean?

22 A. She was implying that I did not get  
23 Jeffrey off, and so she had to do it.

24 Q. And when you say "get Jeffrey off," do you  
25 mean bring him to orgasm?

1 A. Yes.

2 Q. Did Ghislaine ever describe to you what  
3 types of girls Jeffrey liked?

4 A. Model types.

5 Q. Did Ghislaine ever talk to you about how  
6 you should act around Jeffrey?

7 A. She just had a conversation with me that I  
8 should always act grateful.

9 Q. Did Jeffrey ever tell you that he took a  
10 girl's virginity?

11 A. He did not tell me. He told a friend of  
12 mine.

13 Q. And what do you recall about that?

14 MS. MENNINGER: Objection, hearsay,  
15 foundation.

16 THE WITNESS: He wanted to have a friend  
17 of mine come out who was cardio-kickboxer  
18 instructor. She was a physical trainer.

19 And so I brought her over to the house,  
20 and he told my friend Rachel that -- he said,  
21 You see that girl over there laying by the  
22 pool? She was 19. And he said, I just took  
23 her virginity. And my friend Rachel was  
24 mortified.

25



1 BY MS. McCAWLEY:

2 Q. Based on what you knew, did Maxwell know  
3 that the type of massages Jeffrey was getting  
4 typically involved sexual acts?

5 MS. MENNINGER: Objection, foundation,  
6 leading.

7 THE WITNESS: Yes.

8 BY MS. McCAWLEY:

9 Q. What was Maxwell's main job with respect  
10 to Jeffrey?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Well, beyond companionship,  
13 her job, as it related to me, was to find other  
14 girls that would perform massages for him and  
15 herself.

16 BY MS. McCAWLEY:

17 Q. Did Maxwell ever refer to the girls in a  
18 particular way?

19 A. At one point when we were in the islands,  
20 we were all watching a movie and she called us her  
21 children.

22 Q. Did anybody respond to that?

23 A. I don't recall.

24 Q. Did she ever refer to herself as a mother?

25 A. Yes, like a mother hen.

1 time.

2 Q. Did Epstein try to make the massages  
3 sexual?

4 A. On occasion.

5 Q. Would Epstein have you rub his nipples?

6 A. Yes.

7 Q. Would he masturbate during the massages?

8 A. Yes.

9 Q. Did he use sex toys or vibrators on you?

10 A. Yes.

11 Q. Would he leave the sex toys or vibrators  
12 out after the massage or would he clean up after  
13 himself?

14 MS. MENNINGER: Objection, vague, form.

15 THE WITNESS: He did not ever clean up.

16 BY MS. McCAWLEY:

17 Q. Do you believe that your experience during  
18 the years you were with Jeffrey and Maxwell damaged  
19 you?

20 MS. MENNINGER: Objection, leading, form.

21 THE WITNESS: It affected me. "Damaged"  
22 is a strong word.

23 BY MS. McCAWLEY:

24 Q. And in what way did it affect you?

25 A. It affected future relationships with men,

1 trust issues, expectation issues.

2 Q. Did you observe Nadia Marcinkova and  
3 Ghislaine at the house at the same time?

4 MS. MENNINGER: Objection, leading, form.

5 THE WITNESS: I don't recall.

6 BY MS. McCAWLEY:

7 Q. On the USVI trip, the second trip that you  
8 took, do you recall Nadia Marcinkova being present?

9 A. I believe she was present at that trip.

10 Q. Do you recall Maxwell being present on  
11 that trip?

12 A. Yes.

13 Q. Do you know an individual by the name of  
14 [REDACTED]?

15 A. Yes.

16 Q. And who is [REDACTED]?

17 A. She was one of the girls that was around.

18 Q. Was [REDACTED] around both Jeffrey Epstein  
19 and Ghislaine Maxwell?

20 A. I don't recall.

21 Q. Do you recall where you first met [REDACTED]  
22 [REDACTED]?

23 A. In Palm Beach.

24 Q. At Jeffrey Epstein's home?

25 A. Yes.

1 Q. And what -- do you recall any observations  
2 about [REDACTED] when you met her?

3 A. To speak with, she was a little rough  
4 around the edges, and I could see the progression of  
5 her being groomed a little. They got her braces.  
6 She had terrible posture. And with a lot of  
7 massages, she learned to stand up straight. So I  
8 just saw her become a much more confident person.

9 Q. Do you recall how old she was when you  
10 first met her?

11 A. I assumed she was 18, but I do not know  
12 her age.

13 MS. McCAWLEY: We're going to take a break  
14 really quickly and then we will be back. So we  
15 are going to go off the record.

16 THE VIDEOGRAPHER: Off the record at 9:48.

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

19 THE VIDEOGRAPHER: On the record at 9:58.

20 BY MS. McCAWLEY:

21 Q. I'm just going to resume. I have a few  
22 more questions for you.

23 You mentioned visiting the US Virgin  
24 Islands.

25 Do you recall doing any activities with

1 Maxwell when you were on the visit to the USVI?

2 MS. MENNINGER: Objection, vague as to  
3 time.

4 THE WITNESS: I don't recall.

5 BY MS. McCAWLEY:

6 Q. Do you recall ever going hiking with her?

7 A. Yes.

8 Q. Did Maxwell ever ask you to try to bring  
9 other girls over for Jeffrey?

10 A. At that time?

11 Q. Yes.

12 A. No.

13 Q. Any other time?

14 A. Well, she had asked me if I knew anyone  
15 that could perform massages that would come to the  
16 house.

17 Q. And what was your understanding of that  
18 request?

19 MS. MENNINGER: Objection.

20 THE WITNESS: Well --

21 MS. MENNINGER: Form.

22 THE WITNESS: -- I just wondered why they  
23 wouldn't just call me.

24 BY MS. McCAWLEY:

25 Q. And did you bring anybody else over to

1 perform massages?

2 A. I did not.

3 Q. When you were either in the USVI or in  
4 Palm Beach, did you ever observe any females either  
5 topless or naked out by the pool?

6 A. Yes.

7 Q. What did you observe?

8 A. Mostly skinny-dipping.

9 Q. Do you know who the individuals were that  
10 you observed?

11 A. Sarah Kellen and Ghislaine.

12 Q. Anybody else?

13 A. Yes, but I don't recall who.

14 Q. Did that happen on more than one occasion?

15 A. Yes.

16 Q. How often do you remember making those  
17 observations?

18 A. Three times.

19 Q. Do you recall giving a statement to the  
20 police regarding Jeffrey Epstein?

21 A. Yes.

22 Q. Do you recall when you gave that  
23 statement?

24 A. I don't recall the date.

25 Q. Do you recall the year?

1 post that she needed help.

2 She then asked me if I knew anyone, and I  
3 didn't know who she was, I didn't want to take the  
4 responsibility of finding someone to work for her,  
5 and so I said, Sorry, I don't.

6 And then she said, Well, maybe what about  
7 you?

8 And I was at a point in life, I was super  
9 spontaneous and willing to skip school.

10 So she said, Come to my house, come in my  
11 car and check it out.

12 And so I did.

13 Q. Okay. So for those of you -- of us who  
14 don't know, is this like a college campus, like a  
15 traditional college campus, or is it in a city  
16 setting?

17 A. It's in a city setting. I mean, Palm  
18 Beach is not a big city. So it's on the  
19 Intracoastal, and there was a big grassy area that  
20 were surrounded by buildings, so she was inside of  
21 the campus.

22 Q. And she was looking for a bulletin board  
23 where she could post a job?

24 A. Something like that, yes.

25 Q. Did she have any kind of flyers --

1 the news channel 12 showed up at my door asking me  
2 questions.

3 Q. When Jeffrey was pressuring you to do more  
4 than you felt comfortable with, did you observe him  
5 being more aggressive in general? Outside of the  
6 massage context?

7 MS. McCAWLEY: Objection.

8 THE WITNESS: No.

9 BY MS. MENNINGER:

10 Q. Do you know whether he was taking any type  
11 of steroids?

12 A. No.

13 Q. Did you ever see him wearing a patch or  
14 something like that?

15 A. I don't recall.

16 Q. Did you tell anyone that Jeffrey was  
17 becoming more aggressive with you contemporaneous  
18 with when it was happening?

19 MS. McCAWLEY: Objection.

20 THE WITNESS: No.

21 BY MS. MENNINGER:

22 Q. When Jeffrey asked you to do other things  
23 besides a normal massage, did he offer to pay you  
24 additionally?

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 story out, because this is when Dershowitz --  
2 Dershowitz was saying nothing was happening and  
3 he was calling her a liar. And she was just  
4 trying to find people to back up her story.

5 BY MS. MENNINGER:

6 Q. And what did you understand her story to  
7 be? Did she tell you?

8 A. That she was recruited to give massages,  
9 sexual massages, and have sex with people such as  
10 Dershowitz and Andrew. But I knew none of that at  
11 the time.

12 Q. Right. Did you tell them anything -- did  
13 you tell them during that meeting that you knew of  
14 anything about her being recruited to give sex to  
15 either Jeffrey or to other people?

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Can you rephrase?

18 BY MS. MENNINGER:

19 Q. Yes. That wasn't a very good question.  
20 What did you say during this meeting with  
21 Virginia and her investigator?

22 A. Basically that I believed her, even though  
23 I -- she never spoke to me specifically about what  
24 was going on; that once I learned everything that  
25 happened based on reading the police report, I

1 believed her side of the story.

2 Q. And did she tell you what her side of the  
3 story was?

4 A. You know, just that she wasn't a liar;  
5 that, you know, she was there to have sex with men  
6 that Jeffrey wanted her to sleep with.

7 Q. Did she tell you in that meeting who she  
8 had sex with?

9 A. No.

10 Q. Did she name any of the famous people?

11 A. Only Dershowitz came up.

12 Q. Did you two talk about the incident in New  
13 York with the puppet?

14 A. I don't recall.

15 Q. And you formed this opinion about whether  
16 she was a liar based on things that you've read in  
17 the police report?

18 MS. McCAWLEY: Objection.

19 THE WITNESS: I formed my opinion based on  
20 my experience in the house.

21 BY MS. MENNINGER:

22 Q. Okay. And what experience in the house  
23 helped you form your opinion that what Virginia is  
24 saying is true?

25 A. You know, Jeffrey being open with me about

1 A. Flight logs.

2 Q. Any other documents?

3 A. No.

4 Q. What did Ms. McCawley or Mr. Edwards or  
5 any of the other lawyers say to you about Ghislaine  
6 Maxwell?

7 A. They just asked impressions. They never  
8 said anything about her.

9 Q. Were you shown a copy of any report that  
10 came out of that interview?

11 A. Which interview?

12 Q. The one with the -- Virginia's attorneys.

13 MS. McCAWLEY: Objection.

14 THE WITNESS: No.

15 BY MS. MENNINGER:

16 Q. You testified earlier about an incident  
17 with a camera that Ghislaine Maxwell had given you.  
18 I want to ask you some questions about that.

19 A. Sure.

20 Q. Do you know when that was?

21 A. That was in 2002.

22 Q. And why does that date stick out?

23 A. Because I was living -- where I was living  
24 specifically and where I had the phone call.

25 Q. Tell me what you remember about the

1 conversation.

2 A. I had been over to her house prior  
3 massaging Jeffrey. And I got a phone call from her,  
4 and she told me she had a camera for me for my  
5 photography class, but yet, she couldn't give it to  
6 me yet because during the massage I didn't finish my  
7 job and she had to finish it for me.

8 Q. Did she say what she meant?

9 A. No, but I knew.

10 Q. Was there any other time that you had  
11 discussed with her finishing your job?

12 A. Not that I recall.

13 Q. Any other time you just recall discussing  
14 with her anything about your sexual contact with  
15 Jeffrey?

16 MS. McCAWLEY: Objection.

17 THE WITNESS: No.

18 BY MS. MENNINGER:

19 Q. Did she give you the camera?

20 A. I did get the camera.

21 Q. Okay. When did she give you the camera?

22 A. I guess the next time I went to the house.

23 Q. What was said at that time?

24 A. I honestly don't know that she handed it  
25 to me. I remember it being there for me.

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 when she said you hadn't finished the job, with  
2 respect to the camera?

3 MS. MENNINGER: Objection, leading, form.

4 THE WITNESS: She implied that I had not  
5 brought him to orgasm.

6 BY MS. McCAWLEY:

7 Q. So is it fair to say that Maxwell expected  
8 you to perform sexual acts when you were massaging  
9 Jeffrey?

10 MS. MENNINGER: Objection, leading, form,  
11 foundation.

12 THE WITNESS: I can answer?

13 Yes, I took that conversation to mean that  
14 is what was expected of me.

15 BY MS. McCAWLEY:

16 Q. And then you mentioned, I believe, when  
17 you were testifying earlier that Jeffrey told you a  
18 story about sex on the plane. What was that about?

19 MS. MENNINGER: Objection, hearsay.

20 THE WITNESS: He told me one time Emmy was  
21 sleeping on the plane, and they were getting  
22 ready to land. And he went and woke her up,  
23 and she thought that meant he wanted a blow  
24 job, so she started to unzip his pants, and he  
25 said, No, no, no, you just have to be awake for

1 landing.

2 BY MS. McCAWLEY:

3 Q. Do you recall witnessing any sexual acts  
4 on the plane?

5 A. No.

6 Q. Did Emmy ever talk to you about performing  
7 sexual acts on the plane?

8 A. No.

9 Q. We looked earlier at the police report,  
10 and I just want to clarify, you identified some  
11 areas where there were discrepancies in that report.

12 And you can take another look at it if you  
13 want, but other than the discrepancies you pointed  
14 out, is that a recollection of what you remember  
15 telling the detective?

16 A. Yes.

17 MS. MENNINGER: Objection, outside the  
18 scope of cross.

19 BY MS. McCAWLEY:

20 Q. You mentioned that there was a time when  
21 you noticed that Maxwell was around a little bit  
22 less?

23 A. Uh-huh.

24 Q. And I believe you said that was during the  
25 middle of the time you were with Jeffrey.



1                   Do you remember approximately when that  
2 was year-wise?

3           A.    I don't.  I would say it was probably  
4 sometime between 2003 and 2004.

5           Q.    And what made you think that?

6           A.    I just saw her less and less at the house.

7           Q.    Were you there more at the house during  
8 that time period?

9           A.    No, not necessarily.  It's just at the  
10 beginning, she was around a lot.  And then I would  
11 see her occasionally without him.  The one time we  
12 spent a few days together in 2006, she wasn't there  
13 at all.

14          Q.    So you saw her in the -- is it fair to say  
15 that you saw her in the 2005 and 2006 time frame?

16          A.    Yes.

17          Q.    Then we were talking about the photography  
18 earlier and about the photographs.

19                   Did Maxwell ever ask you to take nude  
20 photos of yourself for Jeffrey?

21          A.    She asked me to take photos of myself for  
22 Jeffrey, yes.

23          Q.    And did you do that?

24          A.    I did not.

25          Q.    And the photos that were around that were

1 in the bathroom, that you mentioned a couple of  
2 times places that there were photos of you, who took  
3 those?

4 A. He did.

5 Q. And when we were talking about the Palm  
6 Beach house and you were describing an area where  
7 there were just a lot of photographs, is it fair to  
8 say that there could have been nude photographs  
9 amongst those photos that you saw?

10 A. Yes.

11 Q. And earlier you testified that you don't  
12 have knowledge of what happens behind closed doors,  
13 but you also said that Jeffrey had told you what  
14 other girls did for him and that he wanted you to do  
15 those things for him.

16 Is it fair to say that you knew that other  
17 girls were performing sexual acts?

18 A. Yes.

19 MS. MENNINGER: Objection, foundation,  
20 form.

21 BY MS. McCAWLEY:

22 Q. And I know you mentioned previously that  
23 your relationship and the interaction with him  
24 progressed over time.

25 Did there come a time when you were

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C E R T I F I C A T E

STATE OF FLORIDA )

: ss

COUNTY OF MIAMI-DADE )

I, KELLI ANN WILLIS, a Registered Professional, Certified Realtime Reporter and Notary Public within and for The State of Florida, do hereby certify:

That JOHANNA SJOBERG, 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 the 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 18th day of May, 2016.

\_\_\_\_\_  
KELLI ANN WILLIS, RPR, CRR