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COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

INTERVIEW OF: JAMES EDWARD "JES" STALEY

Thursday, July 24, 2026

Washington, D.C.

The interview in the above matter was held in room 2154, Rayburn House Office Building,
commencing at 10:06 a.m.

Present: Representatives Comer, Luna, Garcia, Ansari, Walkinshaw, Subramanyam,
Krishnamoorthi, Stansbury, and Randall.

1 Appearances:

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5 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

6
7 DANIEL ASHWORTH, GENERAL COUNSEL

8 ALEX BOYD, STAFF ASSISTANT

9 BRITTANY BRIGNAC, SENIOR COUNSEL

10 EMMANUEL CARACHEO, UNDERGRADUATE FELLOW

11 HANNAH CATHEY, PROFESSIONAL STAFF MEMBER

12 MALLORY COGAR, CHIEF CLERK AND DEPUTY DIRECTOR OF OPERATIONS

13 JESSICA COLLINS, COMMUNICATIONS DIRECTOR

14 JACK EMMER, CHIEF COUNSEL FOR INVESTIGATIONS

15 EMILY FEYERABEND, COUNSEL

16 ██████████, INTERN

17 BILLY GRANT, DEPUTY CHIEF COUNSEL FOR INVESTIGATIONS

18 WILL HARNICE, PROFESSIONAL STAFF MEMBER

19 ██████████, INTERN

20 KYLIE HINOJOSA, PROFESSIONAL STAFF MEMBER

21 AND ADMINISTRATIVE CLERK

22 MARK MARIN, STAFF DIRECTOR

23 ██████████, INTERN

24 ██████████, INTERN

25 LISA MORTIER, SENIOR ADVISOR

1 [REDACTED], INTERN
2 PETER SPECTRE, DEPUTY DIRECTOR FOR OVERSIGHT
3 ELLISON TOLAN, COUNSEL
4 ASHLEE VINYARD, DEPUTY STAFF DIRECTOR
5 [REDACTED], INTERN
6 LAUREN WILLIAMS, LEGISLATIVE AIDE
7 [REDACTED], INTERN
8 COLEMAN WRIGHT, STAFF ASSISTANT
9 [REDACTED], MINORITY DEPUTY PRESS SECRETARY
10 [REDACTED], MINORITY STAFF DIRECTOR
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12 MINORITY DEPUTY COMMUNICATIONS DIRECTOR
13 [REDACTED], MINORITY FELLOW
14 [REDACTED], MINORITY COMMUNICATIONS DIRECTOR
15 [REDACTED], MINORITY RESEARCH ASSISTANT
16 [REDACTED], MINORITY RESEARCH ANALYST
17 [REDACTED], MINORITY INTERN
18 [REDACTED], MINORITY PRESS SECRETARY
19 [REDACTED], MINORITY SENIOR COUNSEL
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21 [REDACTED], MINORITY INTERN
22 [REDACTED], MINORITY SENIOR COUNSEL
23 [REDACTED], MINORITY OPERATIONS SPECIALIST
24 [REDACTED], MINORITY RAPID RESPONSE STRATEGIST
25 [REDACTED], MINORITY DEPUTY CHIEF COUNSEL

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3 [REDACTED], MINORITY SENIOR ADVISOR

4 [REDACTED], MINORITY CHIEF COUNSEL

5

6

7 For JAMES EDWARD STALEY:

8

9 BRENDAN V. SULLIVAN, JR., WILLIAMS & CONNOLLY LLP

10 KATHLEEN HARRIS, ARNOLD & PALMER

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1 Ms. Brignac. We will go on the record.

2 This is a transcribed interview of Mr. James Edward Staley conducted by the House
3 Committee on Oversight and Government Reform under the authority granted to it pursuant to
4 House Rule X.

5 Accordingly, House Rule X grants the Committee broad jurisdiction for the Committee to
6 conduct investigations of any matter at any time.

7 This interview was requested by Chairman James Comer as part of the Committee's
8 investigation into the circumstances and subsequent investigations into the crimes of Jeffrey Epstein
9 and Ghislaine Maxwell; the operation of sex trafficking rings and ways for the Federal Government to
10 effectively combat them; the ways in which Mr. Epstein and Ms. Maxwell sought to curry favor and
11 exercise influence to protect their illegal activities; and potential violations of ethics rules related to
12 elected officials.

13 Can the witness please state his name and spell his last name for the record?

14 Mr. Staley. James Edward Staley, S-t-a-l-e-y.

15 Ms. Brignac. Thank you.

16 I want to thank Mr. Staley for appearing here today.

17 My name is Brittany Brignac. I am senior counsel for Chairman James Comer.

18 Under the Committee on Oversight and Government Reform's rules, you are allowed to have
19 counsel present to advise you during this interview. Do you have counsel representing you in a
20 personal capacity present with you today?

21 Mr. Staley. I do.

22 Ms. Brignac. Will all counsels please identify themselves for the record?

23 Mr. Sullivan. Brendan Sullivan, Williams & Connolly, Washington, D.C.

24 Ms. Harris. Kathleen Harris, Arnold & Porter.

25 Ms. Brignac. Thank you.

1 For the record, starting with the majority staff, can the additional staff members please
2 introduce themselves with their name, title, and affiliation?

3 Mr. Grant. Billy Grant, deputy chief counsel for investigations for Chairman Comer.

4 Mr. Emmer. Jack Emmer, chief counsel for investigations for Chairman Comer.

5 Mr. Ashworth. Daniel Ashworth, general counsel for Chairman James Comer.

6 Ms. Tolan. Ellison Tolan, senior counsel for Chairman Comer.

7 Ms. Cathey. Hannah Cathey, professional staff member for Chairman Comer.

8 Mr. Harnice. Will Harnice, professional staff member, Chairman Comer.

9 Ms. Feyerabend. Emily Feyerabend, counsel for Chairman Comer.

10 Ms. Collins. Jessica Collins, comms director.

11 Ms. Cogar. Mallory Cogar, director of operations and chief clerk, Chairman Comer.

12 Ms. Vinyard. Ashlee Vinyard, deputy staff director, Chairman Comer.

13 Mr. Spectre. Peter Spectre, director of oversight, Chairman Comer.

14 [REDACTED]. [REDACTED], senior counsel, Ranking Member Garcia.

15 [REDACTED]. [REDACTED], research analyst, Ranking Member Garcia.

16 [REDACTED]. [REDACTED], chief counsel, Ranking Member Garcia.

17 [REDACTED]. [REDACTED], chief counsel, Ranking Member Garcia.

18 [REDACTED]. [REDACTED], Ranking Member Garcia.

19 [REDACTED]. [REDACTED], senior counsel, Ranking Member Garcia.

20 [REDACTED]. [REDACTED], deputy comms director, Ranking Member Garcia.

21 [REDACTED]. [REDACTED], rapid response strategist, Ranking Member Garcia.

22 [REDACTED]. [REDACTED], press secretary, Ranking Member Garcia.

23 [REDACTED]. [REDACTED], deputy press secretary, Ranking Member Garcia.

24 [REDACTED]. [REDACTED], fellow, Ranking Member Garcia.

25 Ms. Brignac. Mr. Staley, before we begin, I would like to go over the ground rules for this

1 interview.

2 The questioning will proceed in rounds. The majority will ask questions for up to an hour,
3 and then the minority will have an opportunity to ask questions for up to an hour if they choose.

4 To the extent members have questions for the witness, they will be propounded during their
5 side's respective round.

6 The clock will stop if you need to confer with counsel, your counsel is speaking, and when
7 members or staff are present during the opposing side's round of questions.

8 We will alternate back and forth until there are no more questions.

9 Do you understand?

10 Mr. Staley. Yes, I do.

11 Ms. Brignac. There is a court reporter taking down everything I say and everything you say
12 to make a written record of the interview. For the record to be clear, please wait until the staffer
13 questioning you finishes each question before you begin your answer, and the staffer will wait until
14 you finish your response before proceeding to the next question.

15 Further, to ensure the court reporter can properly record this interview, please speak clearly,
16 concisely, and slowly.

17 Also, the court reporter cannot record nonverbal answers, such as nodding or shaking your
18 head. So it is important that you answer each question with an audible, verbal answer.

19 Do you understand?

20 Mr. Staley. Yes, I do.

21 Ms. Brignac. Exhibits may be entered into the record. Majority exhibits will be identified
22 numerically. Minority exhibits will be identified alphabetically.

23 Do you understand?

24 Mr. Staley. Yes, I do.

25 Ms. Brignac. We want you to answer all questions in the most complete and truthful

1 manner possible, so we will take our time. If you have any questions or do not fully understand the
2 questions, please let us know. We will attempt to clarify, add context, or rephrase our questions.

3 If we ask about specific conversations or events in the past and you are unable to recall the
4 exact words or details, you should testify to the substance of those conversations or events to the
5 best of your recollection.

6 If you recall only a part of a conversation or event, you should give us your best recollection of
7 those events or parts of conversations that you do recall.

8 Do you understand?

9 Mr. Staley. I do.

10 Ms. Brignac. Although you are here voluntarily, you are required by law, pursuant to Title
11 18 of United States Code Section 1001 to answer questions from Congress truthfully. This also
12 applies to questions posed by congressional staff in this interview.

13 Do you understand?

14 Mr. Staley. Yes, I do.

15 Ms. Brignac. If at any time you knowingly make false statements, you could be subject to
16 criminal prosecution.

17 Do you understand?

18 Mr. Staley. Yes, I do.

19 Ms. Brignac. This includes both knowingly providing false testimony, but also stating that
20 you do not recall or remember something when, in fact, you do.

21 Do you understand?

22 Mr. Staley. Yes, I do.

23 Ms. Brignac. Furthermore, you cannot tell half-truths or exclude information necessary to
24 make statements accurate. You are required to provide all information that would make your
25 response truthful. A deliberate failure to disclose information can constitute a false statement.

1 Do you understand?

2 Mr. Staley. Yes, I do.

3 Ms. Brignac. Is there any reason you are unable to provide truthful testimony in today's
4 interview?

5 Mr. Staley. No.

6 Ms. Brignac. Please note that if you wish to assert a privilege over any statement today, that
7 assertion must comply with the rules of the Committee on Oversight and Government Reform.

8 Pursuant to that, Committee Rule 16(c)(1) states: "For the Chair to consider assertions of
9 privilege over testimony or statements, witnesses or entities must clearly state the specific privilege
10 being asserted and the reason for the assertion on or before the scheduled date of testimony or
11 appearance."

12 Do you understand?

13 Mr. Staley. Yes, I do.

14 Ms. Brignac. Ordinarily, we take a five-minute break at the end of each hour of questioning,
15 but if you need a longer break or a break before that, please let us know and we will be happy to
16 accommodate. However, to the extent there is a pending question, we would ask that you finish
17 answering the question before we take a break.

18 Do you understand?

19 Mr. Staley. Yes, I do.

20 Ms. Brignac. Do you have any questions before we begin?

21 Mr. Staley. No.

22 Ms. Brignac. I understand you have an opening statement you would like to enter into the
23 record? No? Okay.

24 The time reads 10:13 a.m., and the majority's time will begin now.

25 EXAMINATION

1 BY MS. BRIGNAC:

2 Q Mr. Staley, let's begin by discussing your background.

3 Where were you born?

4 A Born in Cambridge, Massachusetts.

5 Q What year were you born?

6 A In 1956.

7 Q What is your marital status?

8 A I am married, but separated.

9 Q What is your educational background?

10 A I have a bachelor's degree in economics from Bowdoin College.

11 Q We'll go into more detail later, but can you briefly describe your professional career?

12 A I spent 30 years at J.P. Morgan or so; 10 years in Brazil; 10 years building J.P. Morgan's
13 Investment Bank -- excuse me, Asset Management and Private Bank; and then 10 years running the
14 investment bank or thereabouts.

15 Ten years in Latin America. It was 10 years building the equity business. It was like five or
16 six years running Asset Management and three or four years running the Investment Bank. So I
17 stand corrected.

18 Q Over those years in J.P. Morgan, what are the dates that you held each position?

19 A I don't recall the dates.

20 Q When did you start working at J.P. Morgan?

21 A In 1979.

22 Q What was your role at that time?

23 A I went into the training program, and then in 1980 was when I first went to Latin
24 America. I was in Latin America till 1989.

25 Q What were you doing in Latin America?

1 A A number of jobs. At one point, I was running the rep office. And then we got a
2 license to open a bank in Brazil and ultimately ended up running the bank of J.P. Morgan in Brazil.

3 Q What was your next position?

4 A Then I moved to New York and was part of a small team asked to build a public equities
5 business at J.P. Morgan.

6 Q Who asked you to do that?

7 A I believe at the time it was Bill Harrison.

8 Q What year was that?

9 A That would have been 1989.

10 Q What was your next position?

11 A Then I was asked to go run the Private Bank.

12 Q In 1999?

13 A About 2000.

14 Q 2000? Okay.

15 And what was your next position?

16 A Then, added to running the Private Bank, I was asked to run Asset Management as well.

17 Q Was that the next year, 2001?

18 A Thereabouts, yes.

19 Q What was your next position?

20 A I did that until I think about 2009, and then was asked to run the Investment Bank of J.P.
21 Morgan.

22 Q When did you leave J.P. Morgan?

23 A In 2013.

24 Q Why did you leave J.P. Morgan?

25 A I stepped down as head of the Investment Bank and took a much smaller role. And it

1 seemed like it was time to move on from J.P. Morgan.

2 Q Why is that?

3 A I don't know the actual reason. I think there was a period of time where the general
4 thought at Morgan was that the successor to the CEO probably needed to come from the Investment
5 Bank, given its uniqueness and size. And so I think who occupied that role generally was considered
6 a potential successor to the CEO. And I think the bank made the decision that I would not be the
7 successor to the then-CEO, and therefore it was time to step down from the Investment Bank.

8 Q Did they communicate the reason why they thought you were not an appropriate
9 successor?

10 A No.

11 Q Did you ever hear from anyone else why they thought you would not be an appropriate
12 successor?

13 A No.

14 Q Do you believe it was because of your affiliation with Mr. Epstein?

15 A No.

16 Q Do you still hold a role at J.P. Morgan?

17 A No.

18 Q When did you leave J.P. Morgan's orbit entirely?

19 A 2013.

20 Q What was the smaller role you held?

21 A I think I was made chairman of the Investment Bank, which is a much less role than the
22 CEO.

23 Q Did anyone ask you to leave J.P. Morgan?

24 A No, but the implication of the lesser role was it was probably time to move on.

25 Q Did you reach any agreement with J.P. Morgan on your departure about rules you would

1 abide by regarding your knowledge of J.P. Morgan's dealings?

2 A Aside from the sort of standard confidentiality agreements, that was it.

3 Q Was there any additional confidentiality they asked you to abide by given the very
4 senior roles you held?

5 A No.

6 Q Would those confidentiality agreements have prohibited you from discussing J.P.
7 Morgan's dealings with friends of yours?

8 A I think you respect confidentiality, but it was at my discretion if I wanted to talk to
9 friends of mine about issues at J.P. Morgan.

10 Q You were able to use your discretion to discuss confidential matters of J.P. Morgan's?
11 Is that accurate?

12 A I believe so, yes.

13 Q Are you currently employed?

14 A No, I'm not.

15 Q Thank you.

16 Tell me about the first time you interacted with Mr. Epstein?

17 A The first time I interacted with Mr. Epstein would have been I had a passing -- I met him
18 in passing in about 2000. And then in 2001, the then-CEO of J.P. Morgan, Sandy Warner, called me
19 and said that he had met Jeffrey Epstein. It seemed like he was quite connected to a high net worth
20 network in New York and that given my new role as running the Private Bank I should probably meet
21 him. So I did.

22 Q Who introduced you to him?

23 A That would have been Sandy Warner.

24 Q What year was this?

25 A I believe 2001.

1 Q And where were you at this time?

2 A In New York.

3 Q Where specifically in New York?

4 A On Park Avenue right above Grand Central.

5 Q What was the reason for this interaction?

6 A Again, I think I was running the Private Bank, which meant trying to develop high net
7 worth clients for J.P. Morgan. And Sandy Warner mentioned that Jeffrey Epstein seemed to be
8 connected to the high net worth community of J.P. Morgan, and therefore I went to pay a visit to
9 Jeffrey Epstein.

10 Q Why was he considered of a high net worth?

11 A He was an existing client at the Private Bank, so I wasn't the one who brought him in
12 and determined his net worth. That was before I was made head of the Private Bank.

13 Q Did Sandy Warner tell you anything about Mr. Epstein before you met him?

14 A Just that he seemed to be connected to the high net worth community in New York.

15 Q Did you hear anything about Mr. Epstein during your time at the bank?

16 A The entire time at the bank?

17 Q Prior to your meeting Mr. Epstein.

18 A No.

19 Q What did you know about him prior to this meeting?

20 A I guess all I knew was that he had a connection to Les Wexner.

21 Back when I first crossed him in 1999, I was running equity capital markets, and we took The
22 Limited public, which was owned by Les Wexner. And that's where I had the one passing
23 encounter. So all I knew was that he had a connection to Les Wexner.

24 Q Did that alone make him a high-value client, or were there other things you knew about
25 him that led you to that belief?

1 A No. Again, in the beginning it was simply I was asked to meet him by the then-CEO of
2 J.P. Morgan.

3 Q What were your impressions of him upon meeting him?

4 A Again, I knew very little about him, so I think it was a reasonably brief meeting. He had
5 an office next to St. Patrick's Cathedral, which was an interesting place to have an office. But it
6 was a brief conversation, and that was it.

7 Q What was his demeanor? What was he like?

8 A He seemed relaxed, intelligent, curious.

9 Q Who else was present at the meeting?

10 A Just myself.

11 Q What did you understand his job to be?

12 A Again, save for providing some advice to Les Wexner, I didn't know what his job was.

13 Q Did you ever become involved in his business with Les Wexner?

14 A In his business with Les Wexner? No.

15 Q Did you ever become involved in his financial dealings with Les Wexner?

16 A No.

17 Q Did anyone raise concerns about Mr. Epstein prior to this meeting?

18 A No.

19 Q After you met Mr. Epstein, what happened next?

20 A Nothing significant happened next. I think we probably met a few more times. But
21 for a while nothing happened.

22 Q So what was your relationship with him at this time? Were you assigned to any of his
23 accounts? Did you begin dealing with him in his business? What happened next?

24 A I was not -- I had no dealings with his business. I wasn't really sure what his business
25 was aside from his connection to Les Wexner. I had not managed his accounts. I did not know

1 what accounts he had with Morgan.

2 It wasn't a close -- I wasn't close to what he was doing with the bank. And, again, I was very
3 active doing a lot of other things at Morgan.

4 So it was -- we would meet occasionally, not that often, and that was the early years of my
5 interaction with him.

6 Q Who was assigned to his accounts?

7 A At that time, I didn't know who was managing his accounts.

8 Q What part of the bank was he assigned to and why?

9 A He was a high net worth client, so he was a client of the Private Bank.

10 Q What are the requirements to be assigned to the Private Bank? What factors go into
11 that decision?

12 A I think back then it was probably somewhat of a wealth test. Did someone have
13 sufficient net worth to be part of the Private Bank. My recollection, it was roughly a minimum of
14 \$5 million. And that was about it.

15 Q How many accounts did Mr. Epstein have at J.P. Morgan over the years?

16 A I don't know.

17 Q Over a hundred, would you say?

18 A I don't know.

19 Q The Committee has reviewed documents that made us believe he had about 134
20 accounts.

21 Moving into your relationship with Mr. Epstein, we'll go into more specifics later, but for now
22 can you describe the nature and extent of your relationship with Mr. Epstein?

23 A In those early years?

24 Q Overall, generally, over the years.

25 A Again, it changed over time. I think probably the most significant event in the 2000s

1 was his introduction to me of a man named Glenn Dubin. And Glenn Dubin was the founder of a
2 hedge fund called Highbridge Capital Corporation.

3 Q Why is that significant to you?

4 A So in the 2000s, I started out running a Private Bank. And as I said, the then-CEO asked
5 me to add asset management.

6 And the asset management business at that time, the traditional asset management business,
7 was called a long-only business. Asset managers like Fidelity, Capital, and J.P. Morgan and
8 Vanguard would manage portfolios of stocks and portfolios of bonds from a long-only position.
9 That was the principal asset management business.

10 What was developing in the early 2000s were two alternative ways to manage money.

11 One was called private equity. So rather than buying public securities, you would invest in
12 nonpublic companies.

13 The other was the hedge fund industry. And what narrowly defined the hedge fund industry
14 was not only would you go long stocks and bonds, but you could also go short stocks and bonds.
15 And one of the early hedge funds was Highbridge Capital Corporation.

16 Q So did Mr. Epstein's introduction to Glenn Dubin change the nature of your relationship?

17 A Yes, to the extent that over a period of time, over a year or so, I got to know Glenn
18 Dubin. I got to understand somewhat the hedge fund industry. And it began to become an idea
19 with Glenn and myself that perhaps J.P. Morgan as a long-only asset manager make an investment in
20 Highbridge Capital. And Epstein was aware of that.

21 Q And he earned a \$15 million fee from that transaction, correct?

22 A So he encouraged the conversation between Glenn and myself. It took a fair period of
23 time for Glenn and I to reach the conclusion that it might work. It was an internal process of getting
24 Morgan comfortable with the possibility that we might invest in a hedge fund.

25 So it took a period of time, but ultimately Glenn and I found a way to make it work. Epstein

1 was a supporter of the transaction. And when the transaction was consummated, J.P. Morgan, we
2 paid an advisory fee for the acquisition to Goldman Sachs, and Glenn paid an -- or Highbridge, I
3 should say, not Glenn -- Highbridge paid an advisory fee to Jeffrey Epstein.

4 Q And that --

5 A An important note, Highbridge was owned half by Glenn Dubin and half by a gentleman
6 by the name of Henry Swieca. Again, who paid the fee to Jeffrey was Highbridge, neither Glenn nor
7 Henry Swieca.

8 Q Did this acquisition benefit your career?

9 A Yes.

10 Q How?

11 A As I said, you had the traditional asset management industry, and you had the
12 alternative asset management industry. And really up until the Highbridge acquisition by J.P.
13 Morgan, the two industries had never really partnered or --

14 Q I'm sorry, do you understand my question? How did that benefit your career?

15 A Because it was a very successful transaction for J.P. Morgan, it was very novel, and I was
16 seen as the leader of that transaction inside of J.P. Morgan.

17 Q So Mr. Epstein benefited from the transaction and you benefited from the transaction.
18 What year did this transaction take place?

19 A I believe it was closed in 2004.

20 Q Okay. So by this point you've referenced a significant transaction between you and
21 Mr. Epstein. We've covered years --

22 A Excuse me. Say that again? It was not a transaction between me and Jeffrey Epstein.

23 Q Okay. So by this point in 2004 you've referenced a significant event. We've covered
24 years of your relationship with Mr. Epstein. Did you develop a friendship over these years?

25 A Again, it was always a business relationship, but he gave advice and had good insights

1 into the industry and into broader finances, and I would seek his thoughts.

2 Q Did you ever discuss personal matters?

3 A Only later on did I discuss career issues with Jeffrey Epstein, yes, but always around my
4 career and business, not personal.

5 Q So you never discussed personal matters with Mr. Epstein?

6 A No, I think it was always centered around business and my career. If you consider a
7 career personal. But it was around business and my career.

8 Q Did you ever discuss your families?

9 A Only very later on. I discussed the interest of my daughter getting a graduate degree
10 in physics. And so that was probably the first time we talked about personal issues.

11 Q Returning to your dealings with Mr. Epstein, you referenced earlier that you believed it
12 was in your discretion to divulge confidential information. Is that accurate?

13 A Yes.

14 Q Doesn't the nature of confidentiality mean that there are barriers around what you can
15 divulge?

16 A But I think senior officers of the bank, whether it's to a lawyer or to a consultant or
17 someone that they consider knowledgeable in an industry, can ask questions and can talk about
18 confidential issues, issues that, obviously, a person cannot act on it.

19 Q Were there any barriers to your sharing of information with Mr. Epstein specifically by
20 J.P. Morgan?

21 A No.

22 Q How often did you interact with Mr. Epstein in a personal capacity?

23 A Again, my interactions were predominantly around business and my career, so I don't
24 know how to characterize just personal.

25 Q Well, Mr. Staley, documents released by the DOJ illustrate that you referenced Mr.

1 Epstein as family to you. What did that mean?

2 A I use warm language both in a personal capacity as well as a professional capacity. I
3 referred to many colleagues and people I worked with as friends. So I don't -- I didn't find that
4 particularly unique.

5 Q You reference to everyone you have a business relationship with as family?

6 A I didn't say I reference everyone I had business with as family.

7 Q No, I asked if you referenced.

8 A So the answer to that question would be no.

9 Q So why Mr. Epstein?

10 A Again, he was one of the people I dealt with in business that was particularly helpful on
11 a number of levels and transactions. And so I believe the first person to reference a family issue
12 was him referencing to me. I think I was just being accommodating to what he was doing.

13 Q You've already referenced Mr. Epstein did communicate with your daughter. Did he
14 have a relationship with all of your family members?

15 A No, just principally me and my eldest daughter.

16 Q Did you get the impression that your family liked him?

17 A Again, my second daughter had no interaction with him really, and my wife had very
18 limited interaction with him.

19 Q What was the nature of your daughter's relationship with Mr. Epstein?

20 A She was getting -- she was in the process of getting a Ph.D. in physics. Epstein was very
21 engaged, it seemed or it appeared, in the scientific community, internationally, and in the academic
22 community, particularly with Columbia and Harvard.

23 Q Did they frequently communicate without your knowledge?

24 A No, I don't think so.

25 [Staley Majority Exhibit No. 1.

1 was marked for identification.]

2 BY MS. BRIGNAC:

3 Q I'm entering majority exhibit 1 into the record which is Bates stamped with
4 EFTA00905750 and dated March 5th, 2011. This is an email between you, Mr. Staley, and Mr.
5 Epstein. We'll get that passed out and give you a moment to review.

6 Whenever you're ready?

7 A I'm ready.

8 Q Do you recognize this document, Mr. Staley?

9 A I recognize it's an email from me to Mr. Epstein, yes.

10 Q Can you please read it into the record?

11 A From Jes Staley to jeevacation@gmail.com. No subject. The date is Saturday, 5th of
12 March, 2011. I think it's 5:11:41 seconds.

13 And it reads: "Deby and I were talking tonight about what you have meant to me and to
14 █████ You have paid a price for what has been accused. But we know what you have done for us
15 and we count you as one of our deepest friends and most honest of people. Thanks, Jes."

16 Q And, Mr. Staley, is Deby referring to your legally married wife who you're separated
17 from?

18 A Yes.

19 Q And █████ refers to your daughter?

20 A Yes.

21 Q Why did you send this email?

22 A It was quite unique at that time that a young woman from -- a young woman would
23 pursue a Ph.D. in physics. And █████ at one point made the decision to pursue a career as a
24 physicist.

25 Epstein was, as I said, very connected to the scientific community, and he encouraged my

1 daughter to pursue a doctorate in physics and connected her to some people in the physics
2 community.

3 Mr. Grant. We've had some Members of Congress join us. Could they please announce
4 themselves for the record?

5 Chairman Comer. James Comer, Chairman, House Oversight Committee.

6 Mr. Krishnamoorthi. Raja Krishnamoorthi.

7 Mr. Grant. Thank you all.

8 BY MS. BRIGNAC:

9 Q Mr. Staley, I understand in sworn testimony to the Financial Conduct Authority you
10 admitted by 2010 you knew Mr. Epstein lied to you in 2006 about the ages of victims who had
11 brought allegations against him. This email you said is in 2011.

12 Can you help reconcile our confusion about why you would call him the most honest of
13 people when you knew he lied to you?

14 A Again, I think it was a reflection of the pride we had in what our daughter was doing, the
15 uniqueness of someone of her age accomplishing what she accomplished in physics. It was, I think,
16 reflective more of what [REDACTED] was doing than anything else.

17 But he was helpful. And I use warm language on many occasions. And he was constructive
18 in what our daughter accomplished.

19 Q Can you tell me about your first interaction with Ghislaine Maxwell?

20 A I don't believe I had interaction with Ghislaine Maxwell.

21 Q You recommended J.P. Morgan open an account for her; correct?

22 A I don't remember that.

23 Q Would it help if we refreshed your recollection?

24 A Sure.

25 Q We'll go off the record.

1 [Discussion off the record.]

2 Ms. Brignac. We'll go back on the record.

3 I am entering majority exhibit 2 into on the record, which is an internal report generated by
4 J.P. Morgan and Bates stamped EFTA01582859.

5 [Staley Majority Exhibit No. 2.
6 was marked for identification.]

7 BY MS. BRIGNAC:

8 Q I would draw your, attention Mr. Staley, to the bottom right of the page under the
9 "Banker Response" column where it states: "Ghislaine Maxwell is a very close friend of Jeffrey
10 Epstein who is an existing client and who has recommended us to her. Jes Staley has also met with
11 her and has recommended we open an account for her."

12 So do you recall meeting Ms. Maxwell now?

13 A I don't.

14 Q Did J.P. Morgan end up opening an account for Ms. Maxwell?

15 A I have learned that they did, yes.

16 Q And we can agree your recommendation for a referred client in opening account
17 probably carries quite a bit of weight with your senior roles, correct?

18 A I think there's a whole process to go to open an account of the Private Bank. That
19 involves compliance departments, legal departments, et cetera. So I think there's a process that
20 the bank follows. The recommendation would be accounted in that process. But it's a separate
21 process for opening an account.

22 Q Did Mr. Epstein ask you to meet with Ms. Maxwell?

23 A I don't recall that.

24 Q Have you ever met with Ms. Maxwell on any other occasion?

25 A Again, I don't know what occasion this refers to. If you have what occasion, that would

1 be helpful for my memory.

2 Q No, just based on your personal knowledge, do you have any recollection of other
3 meetings with Ms. Maxwell besides the one I've just showed you?

4 A No.

5 Q How often would you have casual or private conversations with Mr. Epstein?

6 A Again, I think we met with a fair degree of frequency and had a fair degree of telephone
7 calls and that sort of thing. So fairly often.

8 Q Can you estimate daily, weekly, monthly?

9 A I would say weekly.

10 Q Weekly.

11 Did Mr. Epstein ever discuss young women or girls with you?

12 A No, he did not.

13 Q Did Mr. Epstein ever introduce you to young women or girls?

14 A No, he did not.

15 Q Did Mr. Epstein ever discuss massages with you?

16 A No, he did not.

17 Q Did Mr. Epstein -- strike that.

18 Did you ever witness Mr. Epstein receive a massage of any kind from a young woman or girl?

19 A No, I did not.

20 Q Did you ever witness Mr. Epstein pay women for massages?

21 A No, I did not.

22 Q Did you ever witness Mr. Epstein giving cash to other young women or girls?

23 A No, I did not.

24 Q Did you ever witness Ms. Maxwell giving cash to young women or girls?

25 A No, I did not.

1 Q Did Mr. Epstein ever discuss sexual acts with you?

2 A No.

3 Q Did you ever witness Mr. Epstein sexually abuse or assault young women or girls?

4 A No.

5 Q Did you ever witness Ms. Maxwell sexually abuse or assault young women or girls?

6 A No.

7 Q Did you ever witness Mr. Epstein engage in sexual conduct?

8 A No, I did not.

9 Q Did you ever witness Ms. Maxwell engage in sexual conduct?

10 A No, I did not.

11 Q Did you ever witness Mr. Epstein exploit young women or girls?

12 A No, I did not.

13 Q Ms. Maxwell?

14 A No, I did not.

15 Q Did they ever threaten anyone?

16 A I never saw that.

17 Q Did Mr. Epstein or Ms. Maxwell ever ask if you wanted them to bring women or girls to
18 you?

19 A No.

20 Q Did you ever have sexual contact with any young woman or girl introduced to you by
21 Mr. Epstein?

22 A What do you mean by introduced?

23 Q However you interpret introduction.

24 A So ask the question again?

25 Q Did you ever have sexual contact with any young woman or girl introduced to you by

1 Mr. Epstein?

2 A Young women and girls, no.

3 Q Why the confusion on that question? Is there someone you think we should be aware
4 of?

5 A As I have testified before, I had an encounter once with someone who was on Epstein's
6 staff but was a mature woman.

7 Q Okay. We'll return to that.

8 Did you ever have any sexual contact with young women or girls in the presence of Epstein?

9 A No.

10 Q Were you ever aware that Mr. Epstein regularly entertained young women at his
11 residences?

12 A No.

13 Q How did Mr. Epstein act towards the young women or girls that were around him?

14 A As I said, I did not see him with young women or girls around him.

15 Q How did he act with his assistants?

16 A He treated them professionally.

17 Q We can agree his assistants were mostly young women, correct?

18 A Again, it would be helpful if you define young women. There were women of late 20s,
19 30s.

20 Q Were you aware of the nature of any of Mr. Epstein's activities involving minors?

21 A No.

22 Q When did you become aware of these activities?

23 A I knew in 2006 that he was indicted and obviously was aware in 2008 of his plea. And
24 that's when I think those -- when I became aware of the allegation that he was involved with minors.

25 Q Do you know of any individuals that knowingly facilitated Mr. Epstein in his criminal

1 activities?

2 A No.

3 Q And for the record, have you ever been contacted by any law enforcement agency
4 concerning Jeffrey Epstein or Ghislaine Maxwell?

5 A No, I have not.

6 Q Have you ever been interviewed by any law enforcement agency concerning Jeffrey
7 Epstein or Ghislaine Maxwell?

8 A No, I have not.

9 Q Have you ever provided any information to any law enforcement agency concerning
10 Jeffrey Epstein or Ghislaine Maxwell?

11 A No, I have not.

12 Q Did Jeffrey Epstein ever inform or represent to you he was working with any intelligence
13 service of any nation, including the United States?

14 A No, he did not.

15 Q Did Ghislaine Maxwell?

16 A No, she did not.

17 Q During your relationship, did you ever suspect Jeffrey Epstein or Ghislaine Maxwell of
18 being affiliated with any intelligence agency?

19 A Jeffrey Epstein had a network of contacts internationally, but I never associated it with
20 an intelligence agency.

21 Q At any time, have you had an affiliation with any intelligence agency?

22 A When I was with the Private Bank, I had some interaction with parts of the U.S.
23 intelligence system.

24 Q Have you or any of your representatives or agents asked anyone to sign a nondisclosure
25 agreement or other agreement in connection with Jeffrey Epstein?

1 A No, I have not.

2 Q Have you or any of your representatives or agents asked anyone to sign a nondisclosure
3 agreement in connection with Ghislaine Maxwell?

4 A No, I have not.

5 Q Have you or any of your representatives or agents asked anyone to sign a nondisclosure
6 agreement affiliated with any of Jeffrey Epstein and Ghislaine Maxwell's victims?

7 A No, I have not.

8 Q I'm going to follow up with more questions, but for now please answer yes or no to the
9 following.

10 Have you ever visited Mr. Epstein's private island Little Saint James?

11 A Yes.

12 Q How many times?

13 A I believe three times, although one occasion was literally to get on his island into the
14 helicopter and left.

15 Q Have you ever visited Mr. Epstein's Palm Beach house?

16 A No.

17 Q Have you ever visited Mr. Epstein's Manhattan townhouse?

18 A Yes.

19 Q Have you ever visited his apartment buildings or offices at 301 East 66th Street in New
20 York?

21 A Yes.

22 Q Have you ever visited Mr. Epstein's New Mexico ranch Zorro?

23 A Once.

24 Q Have you ever visited Mr. Epstein's Paris apartment?

25 A No.

1 Q Have you ever visited Mr. Epstein's Great Saint James Island?

2 A That's the island in the Virgin Islands. Yes.

3 Q Have you ever visited Mr. Epstein's property in New Albany, Ohio?

4 A I didn't know that he had a property in New Albany, Ohio.

5 Q Have you ever visited any of his other properties that are owned or leased by him that I
6 didn't state?

7 A No.

8 Q How many times did you visit his Manhattan townhome?

9 A Dozens of times.

10 Q And his offices at 301 East 66th Street in New York how many times?

11 A Once.

12 Q Did you see any young women or girls while you were at the Manhattan townhome?

13 A No.

14 Q While at any properties, did you witness any sexual conduct by Jeffrey Epstein with any
15 women or girls?

16 A No.

17 Q While at any of his properties, did you witness any sexual conduct by anyone else with
18 young women or girls?

19 A No.

20 Q Mr. Staley, you've testified that you did give prior testimony that you had a sexual
21 relationship with one of Mr. Epstein's assistants. Who was that?

22 A [REDACTED].

23 Q How did you meet her?

24 A She was an assistant to Jeffrey Epstein, and I met her at his townhouse.

25 Q Who else was there?

1 A Again, most often it would be his assistant Lesley Groff. That would be really the only
2 other person that was often there that I saw.

3 Q How many times did you interact with her before you had sex?

4 A A handful.

5 Q Can you give me a number estimate?

6 A I would be guessing, but 6 to 12.

7 Q What were the circumstances that led you to have sex with her on that first occasion?

8 A On the only occasion.

9 We met and began to have a dialogue and it turned flirtatious. And we met and had one
10 intimate encounter.

11 Q Did Mr. Epstein set it up?

12 A No.

13 Q Are you aware if she's had sex with anyone else associated with Mr. Epstein?

14 A No.

15 Q Where did the sex take place?

16 A At her apartment.

17 Q Where did she live?

18 A 66th Street, to my recollection.

19 Q Did you discuss the fact that you had sex with her with Mr. Epstein?

20 A No, I did not.

21 Q Do you know if she shared that with Mr. Epstein?

22 A No, I don't.

23 Q Have you had sex with anyone else associated with Mr. Epstein?

24 A No, I have not.

1 were marked for identification.]

2 Ms. Brignac. I am now entering into the record three exhibits, which will be marked
3 majority exhibits 3, 4, and 5. We're going to go off the record to pass these out.

4 [Discussion off the record.]

5 Ms. Brignac. We'll go back on the record.

6 BY MS. BRIGNAC:

7 Q Majority exhibit 3 is Bates stamped EFTA00779451. Majority exhibit 4 is Bates
8 stamped EFTA00741531. Majority exhibit 5 is Bates stamped EFTA01300651. All three exhibits
9 are parts of email exchanges that took place from July 10th through July 11th of 2010.

10 I'm going to begin, Mr. Staley, by asking questions about majority exhibit 3. This is a
11 photograph sent by Mr. Epstein to a redacted name on July 11th, 2010.

12 Have you seen this photo before?

13 A No, I have not.

14 Q Did you see this photo in preparation for your examination today?

15 A This photo, no.

16 Q Acknowledging the face in this photograph is redacted, can you otherwise describe what
17 you see in the photo?

18 A That looks like Epstein's apartment in New York, and obviously it's someone dressed in a
19 costume.

20 Q Yes, it appears to be a young woman in a Snow White costume.

21 Who is in this photograph?

22 A I don't know.

23 Q The Committee has been able to identify this photograph as [REDACTED].

24 Have you met [REDACTED]?

25 A I don't believe so.

1 Q You stated you have been to Mr. Epstein's New York townhome. Were you there on or
2 around July 9th through 10th, 2010?

3 A I don't know.

4 Q You don't know because you can't recall?

5 A Yes.

6 Q I will now turn to majority exhibit 4. This email was sent from a [REDACTED] who the
7 Committee understands to be [REDACTED], to Mr. Epstein on July 10th, 2010, at 12:36 a.m.
8 And it states that "Snow White was f..ed twice as soon as she put on her costume."

9 Mr. Staley, what do you interpret "f..ed" to mean?

10 A Say it again? Sorry. This email is from who?

11 Q This is from [REDACTED] in the Committee's review of the documents. My
12 question is, what do you interpret "f..ed" to mean?

13 A Intercourse.

14 Q Were you ever around this woman in the Snow White costume at Mr. Epstein's
15 residence?

16 A No.

17 Q Okay. We will now turn to majority exhibit 5. This is an email exchange between
18 you, Mr. Staley, and Mr. Epstein on July 10th, 2010, sent around the same time that [REDACTED]
19 was reporting to Mr. Epstein that Snow White had been f..ed twice.

20 In your email exchange with Mr. Epstein you state: "That was fun. Say hi to Snow White."
21 Why did you send this email?

22 A I don't recall. So I don't know.

23 Q Who were you asking Mr. Epstein to say hi to?

24 A I'm saying: "Say hi to Snow White."

25 Q Yes, who is Snow White?

1 A Yeah, I'm saying I don't know who Snow White is.

2 Q We can agree it's coincidental that at the same time you send this email [REDACTED] is
3 sending to Mr. Epstein that she was in a Snow White costume, correct?

4 A Yes.

5 Q Why do you think that is?

6 A Again, I don't know.

7 Q Do you maintain you've never met [REDACTED] ?

8 A I don't recall ever meeting her, no. I don't know who she is.

9 Q Now that I've refreshed your recollection, do you recall being at Mr. Epstein's New York
10 townhome on July 9th or 10th, 2010?

11 A Again, we're talking 16 years ago. I don't know exactly what dates I was at his
12 townhouse. I don't recall seeing someone in the Snow White outfit.

1 [11:08 a.m.]

2 BY MS. BRIGNAC:

3 Q Have you seen any woman in a costume around Mr. Epstein?

4 A No.

5 Q Later in the email exchange, Mr. Epstein asks, "What character would you like next?"

6 What do you think Mr. Epstein's asking you here?

7 A Um. You know --

8 Q I didn't get that. Can you speak up?

9 A Yeah, I'm trying to -- I'm reading the emails.

10 This seems to imply that I saw a Snow White. And Epstein says, you know, "What character
11 would you like next?" And I referred to "Beauty and the Beast," which was a movie at that time.

12 Q Who were you referring to as "Beauty and the Beast"?

13 A I don't know. I was referring to the movie "Beauty and the Beast."

14 Q Have you had sexual relations with any woman dressed as a Snow White?

15 A No, I have not.

16 Q Mr. Epstein later responds in the email, "Well, one side is available."

17 Who is Mr. Epstein referring to? It doesn't appear to be the movie.

18 A Oh, it seems like he's talking about a beauty. But I don't know who that is.

19 Q Have you ever had sex with Mr. Epstein?

20 A No.

21 Q Has Mr. Epstein ever asked you to have sex with him?

22 A No.

23 Q Does it appear that the characters Mr. Epstein is offering to you can say no?

24 Mr. Sullivan. That's a pretty far-out -- I'm doing my best to remain silent, but --

25 Mr. Ashworth. I'm sorry?

1 Mr. Sullivan. That's a pretty far-out question.

2 Ms. Brignac. I would like for you to answer it.

3 Mr. Sullivan. Could you read it back for us?

4 BY MS. BRIGNAC:

5 Q Does it appear that the characters Mr. Epstein is offering to you can say no? Or does it
6 appear to be your choice whether to have the characters?

7 A I don't think he's offering characters to me.

8 Q Did you and Mr. Epstein use Disney princesses as code names for selecting women for
9 sexual encounters?

10 A No.

11 Q The Committee has also reviewed documents where Philip Levine uses the exact same
12 code name "Beauty and the Beast." Why would that be?

13 A Who is Philip Levine?

14 Q The Committee has received credible accusations that Mr. Levine is a man in Mr.
15 Epstein's orbit that committed assault against one of the assistants.

16 Have you ever been around Mr. Levine?

17 A I don't know who he is.

18 Q Okay.

19 The Committee has also reviewed documents that reference other Disney princesses. We
20 would appreciate any information you have on helping us to decode who these women are.

21 Tinker Bell?

22 A No.

23 Q The Little Mermaid?

24 A No.

25 Q Cinderellas?

1 A No.

2 Q Sleeping Beauty?

3 A No.

4 Q Have you ever met Frederic Fekkai?

5 A No, I have not. I may have met him once, but I don't re- -- yeah -- but nothing to do
6 with Epstein.

7 Q Did you ever hear rumors that Frederic Fekkai was involved with Mr. Epstein's
8 assistants?

9 A No.

10 Q Same question for Mr. Levine. Did you ever hear anything about Mr. Levine's
11 involvement with Epstein's assistants?

12 A I don't know who Mr. Levine is, so no.

13 Ms. Brignac. We'll go off the record.

14 [Recess.]

15 [REDACTED]. We're back on the record.

16 Good morning, Mr. Staley. My name is [REDACTED], and I'm going to be asking most of
17 the questions for the minority today.

18 I'm going to cover some of the same topics that the majority covered with you in the previous
19 round. That is not to make you repeat yourself but, rather, to make sure we have as clear a record
20 as possible. I appreciate your patience while I do that.

21 In addition, to the extent that any of my questions or any of your answers involve survivor
22 names or any other survivor identifying information, I ask on behalf of the minority that the majority
23 redact that information prior to releasing the transcript publicly.

24 EXAMINATION

25 BY [REDACTED]:

1 Q Mr. Staley, I'd like to start with something that you talked about briefly in the previous
2 round.

3 You testified that you had sex with a young woman on Mr. Epstein's staff both in a deposition
4 in a class action against J.P. Morgan and also before the U.K.'s Financial Conduct Authority.

5 As reported by The New York Times, you said that, in 2009 or 2010, while visiting Mr.
6 Epstein's New York residence, you had a conversation with a young woman in her twenties who
7 worked for Mr. Epstein.

8 You further said that the young woman suggested that you come by the building she lived in
9 on the Upper East Side. According to you, when you visited her apartment, you went to her
10 bedroom, had consensual sex, took a shower, and then left and went back to work.

11 I have some questions for you about that encounter.

12 Do you remember when you first met this woman?

13 A Not exactly, no.

14 Q So you said it was sometime in 2009 or 2010. Can you be more specific?

15 A No. I mean, 2009, 2010.

16 Q Mr. Epstein was incarcerated through July 2009 and on house arrest through July 2010.
17 Does that help you narrow down the period?

18 A I guess -- I guess it would've been after July 2009 then.

19 Q And you said previously that you met this young woman at Mr. Epstein's New York
20 home, correct?

21 A Yeah. And, again, I don't know whether she was in her twenties or thirties, but --

22 Q I asked if you met her at Mr. New York -- excuse me. I asked if you met her at Mr.
23 Epstein's New York home.

24 A Yes, I did.

25 Q And you're also saying you don't remember her age?

1 A Again, I think it was twenties or thirties.

2 Q And you said previously that you'd talked to this woman a few times. Do you
3 remember exactly how you first met her?

4 A Yeah. She was an assistant for Epstein. Oftentimes when I went to his house, he
5 would not, you know, be available, and so she and I would engage in a discussion about, you know,
6 just banter.

7 Q And do you remember how many times you spoke with her?

8 A I'm sure it would've been half a dozen to a dozen times.

9 Q Did you talk to other assistants for Mr. Epstein too?

10 A Yes.

11 Q Did you have any sense of what she did as one of Mr. Epstein's assistants?

12 A You know, he had -- he traveled a lot. He had a lot of properties. She seemed to
13 have an administrative role in helping travel and management of his properties, is what I thought.

14 Q When did you have the conversation with her where you claim she invited you to her
15 apartment?

16 A I don't exactly recall, but I think it was 2010.

17 Q Do you remember when it was relative to when you first met her?

18 A I'm sure it was months after I first met her.

19 Q Months. Okay. What exactly did she say to you?

20 A I don't recall the exact conversation.

21 Q Did she tell you why she wanted you to come to her apartment?

22 A I don't believe so, no.

23 Q So she just invited you to her apartment, but she didn't tell you why she wanted you to
24 come?

25 A I think it was suggested, but I don't think she said explicitly, no.

1 Q How would she have suggested that?

2 A "You want to come by my apartment," you know, "tomorrow morning?" I think that's
3 suggestive.

4 Q So did she tell you when she wanted you to come by her apartment?

5 A Just in the morning is my recollection.

6 Q Did she tell you where her apartment was?

7 A Yes.

8 Q And your recollection is, you had this conversation one day at some point in 2010 and
9 then the next day, specifically the next morning, you went to her apartment?

10 A That seems right, yes.

11 Q How did you get into her apartment?

12 A It was a concierge building, and I went to the concierge and said I was there to meet [REDACTED]
13 (ph). He called up; she said, "Please let him in." He gave me her apartment number, and I went
14 up to the apartment.

15 Q You testified that you had sex at her apartment. Please walk us through what
16 happened.

17 A I think we talked. I believe we were sitting on her couch together while we talked.
18 And one thing led to another and we had an intimate engagement.

19 Q Was the sex consensual?

20 A Yes.

21 Q How did you know it was consensual?

22 A My recollection is, she invited me into her bedroom.

23 Q Do you remember what she said to you?

24 A Precise words, no.

25 Q Are you aware that Mr. Epstein would instruct women in his orbit to have sex with men

1 that he was connected to?

2 A No, I was not.

3 Q You've since become aware of that, correct?

4 A I am not aware of him instructing his assistants to have sex with men, no. I'm not.

5 Q As you sit here today, that is something that you are totally unaware of?

6 A Yes.

7 Q You previously testified that you never spoke to Mr. Epstein about this encounter,
8 correct?

9 A That's correct.

10 Q So how do you know that Mr. Epstein did not instruct this woman to have sex with you?

11 A That's my assumption. It didn't seem -- that's what I assumed.

12 Q Is it possible that, instead of her inviting you to her apartment, you just showed up?

13 A No.

14 Q Were you violent with her?

15 A No.

16 Q Had you ever been to this young woman's apartment or her building before?

17 A No, I had not.

18 Q Did you visit this young woman's apartment or her building after?

19 A No, I did not.

20 Q You said previously you remembered the building was on 66th Street. Is it correct that
21 the building was 301 East 66th Street?

22 A I don't recall the exact number.

23 Q Were you aware at the time that Mr. Epstein housed women he trafficked in this
24 building?

25 A No, I was not.

1 Q Are you aware of that now?

2 A No, I am not.

3 Q Did you see this young woman following this encounter?

4 A Yes, I did.

5 Q How often?

6 A A few times, I think.

7 Q Was this at Mr. Epstein's New York home?

8 A Yes.

9 Q Did you speak with her?

10 A I believe so, yes.

11 Q What did you talk about?

12 A Just casual conversation.

13 Q Did you engage in any sexual activity with this young woman at any point after your visit
14 to her apartment?

15 A No, I did not.

16 Q And, to be clear, that encounter that you claim was consensual was the first time that
17 you engaged in any sexual activity with this woman?

18 A That's correct.

19 Q This woman sued Mr. Epstein for sexual abuse and settled with his estate. Were you
20 aware at the time that Mr. Epstein was sexually abusing her?

21 A No, I was not.

22 Q This woman carved you out of her settlement with Mr. Epstein's estate, meaning that
23 she reserved the right to pursue legal action against you. Were you aware of this?

24 A No, I was not.

25 Q You were not aware of this at any point up until today?

1 Mr. Sullivan. His answer to that would require revealing attorney-client communication.

2 BY [REDACTED]

3 Q If the sex that you had with this woman was consensual, as you claim it was, why would
4 she have wanted to reserve her right to bring claims against you?

5 A I don't know.

6 Q You previously testified in a sworn deposition that this was your only Epstein-connected
7 sexual encounter.

8 A That's correct.

9 Q Do you stand by that testimony?

10 A I do.

11 Q Did you ever meet any minor girls through Mr. Epstein?

12 A No, I did not.

13 Q But you did meet young women through Mr. Epstein, correct?

14 A Again, I met some of his assistants, who were in their twenties or thirties.

15 Q And you met the woman that you claim you had consensual sex with through
16 Mr. Epstein, correct?

17 A Correct.

18 Q How many young women would you say you met through Mr. Epstein?

19 A A half a dozen.

20 Q Other than the encounter that we just discussed, did you engage in sexual activity with
21 any of those women?

22 A No, I did not.

23 Q Did Mr. Epstein ever pay women to engage in sexual activity with you?

24 A No, he did not.

25 Q I'd like to introduce as minority exhibit A an email chain between you and Mr. Epstein

1 starting on August 27th, 2009. The Bates number is EFTA02436302.

2 [Staley Minority Exhibit A.

3 was marked for identification.]

4 BY [REDACTED]:

5 Q In the second email of the chain, you tell Mr. Epstein that you will be in London that
6 week. Mr. Epstein responds, quote, "Do you need anything there?" And you reply, quote, "Yep."

7 Mr. Sullivan. This is one document, right? One page?

8 [REDACTED]. Correct, it's one page.

9 BY [REDACTED]:

10 Q What did you understand Mr. Epstein to mean by, quote, "Do you need anything
11 there?"

12 A I don't recall. I mean, I go to London on business a lot. He was very connected in
13 London. But I don't know specifically -- I don't recall specifically what it was in 2009.

14 Q It does appear that he's offering you something, though, correct?

15 A I think he's just asking if I needed anything there.

16 Q So offering you something.

17 In replying, quote, "Yep," you were affirming that you did need whatever Mr. Epstein was
18 offering, correct?

19 A I don't know what he was offering.

20 Q Sure. But he's sending you an email asking you a question, quote, "Do you need
21 anything there?" And you respond, quote, "Yep." So, regardless of what he was offering, you are
22 indicating that you do, in fact, need that thing.

23 A Yeah. He used to set up business with people from the Treasury, people from the
24 royal family -- lots of things he used to set up.

25 Q But you are indicating that you, in fact, need that thing. You are responding, quote,

1 "Yep."

2 A Yes.

3 Q I would like to introduce as minority exhibit B an email from Mr. Epstein to a redacted
4 individual dated September 2nd, 2009, just 3 days after you responded to Mr. Epstein's email with,
5 quote, "Yep." The Bates number is EFTA00883896.

6 [Staley Minority Exhibit B.
7 was marked for identification.]

8 BY [REDACTED]:

9 Q In the email, Mr. Epstein says, quote, "Jes Staley is staying at the Berkeley Hotel in
10 London tonight."

11 I can represent to you based on in camera review of the unredacted version of this document
12 that this individual is a young woman from Eastern Europe.

13 Did you ask Mr. Epstein to email this young woman your hotel information?

14 A Where do you know that's a young woman from?

15 Q Excuse me? I didn't catch that.

16 A Where do you know that it's a young woman from?

17 Q Based on in camera review of the unredacted version of this document.

18 A Ask the question again.

19 Q Did you ask Mr. Epstein to email this young woman your hotel information?

20 A No.

21 Q Did Mr. Epstein tell you that he was emailing this young woman your hotel information?

22 A No.

23 Q Is that something that he had done previously?

24 A No.

25 Q Why do you think that Mr. Epstein shared your hotel information with this young

1 woman?

2 A I don't know.

3 Q Was it because Mr. Epstein was instructing this young woman to go to your hotel and
4 have sex with you?

5 A No. I don't know.

6 Q You don't know, or no?

7 A No. I mean, I did not have an encounter with the young woman in a hotel when the --

8 Q But your answer to my question, was it because Mr. Epstein was instructing this young
9 woman to go to your hotel and have sex with you -- is your answer "no" --

10 A No.

11 Q -- or "I don't know"?

12 A No.

13 Q How would you know --

14 A Oh, sorry. No.

15 Q -- that Mr. Epstein hadn't --

16 A Can you ask the question again? Sorry.

17 Q I asked you why you thought Mr. Epstein shared your hotel information with this young
18 woman. I believe you said you did not know.

19 I then asked you, was it because Mr. Epstein was instructing this young woman to go to your
20 hotel and have sex with you?

21 A I don't know.

22 Q Did Mr. Epstein otherwise introduce you to young women from Eastern Europe when
23 you were in London?

24 A No.

25 Q Never?

1 A Never.

2 Q Did Mr. Epstein ever send women or girls to your hotel or wherever you were staying on
3 any other occasion?

4 A No.

5 Q I'd like to introduce as minority exhibit C an email exchange between Mr. Epstein and
6 Andrew Mountbatten-Windsor from June 14th, 2010. The Bates number is EFTA01812700.

7 [Staley Minority Exhibit C.

8 was marked for identification.]

9 BY [REDACTED]:

10 Q In the first email of the chain, Mr. Epstein says, quote -- this is at the very bottom -- he
11 says, quote, "If you can find time to show Jes around with [redacted], that would be fun. He told
12 me he ran into you tonight."

13 Mr. Mountbatten-Windsor confirms that the two of you saw each other and then asks
14 Mr. Epstein who "redacted" is.

15 Mr. Epstein responds, quote, "A great friend of mine, very pretty. She is my future ex-wife.
16 I know Jes and she would love to see home."

17 The next day, June 15th, Mr. Mountbatten-Windsor complains to Mr. Epstein that the woman
18 did not respond to his email and notes that he is having dinner with you the following evening.

19 Mr. Epstein replies by giving Mr. Mountbatten-Windsor the woman's phone number and
20 telling him that she is expecting his call.

21 I can represent to you based on in camera review of the unredacted version of this document
22 that the person Mr. Epstein calls his "future ex-wife" is another young woman from Eastern Europe, a
23 different young woman than the one we just discussed.

24 Did you meet this woman?

25 A No.

1 Q Did Mr. Mountbatten-Windsor show you around London? This was in June of 2010.

2 A Around London? No.

3 Q Did Mr. Mountbatten-Windsor give you a tour of his home?

4 A I visited the palace. I thought it was just by myself. I didn't recall him joining or being
5 there.

6 Q Do you remember when you visited the palace?

7 A Not -- not exactly, no.

8 Q Do you have a year?

9 A No, but I know I went once.

10 Q And that's Buckingham Palace, correct?

11 A Yes.

12 Q And your recollection is that you visited but you weren't with
13 Mr. Mountbatten-Windsor?

14 A That's my recollection. Because my recollection is, I went by taxi, and I just -- I just
15 recall it because the taxi driver was quite taken aback that he was going into Buckingham Palace.

16 Q So your recollection is that you weren't with Mr. Mountbatten-Windsor when you
17 toured Buckingham Palace and he did not otherwise show you around London.

18 A That's correct.

19 Q And the two of you for -- or you, rather, for either one of those activities, you were not
20 joined by a young woman from Eastern Europe.

21 A That's correct.

22 Q I'd like to introduce as minority exhibit D an email --

23 A Can I make one clarification?

24 Q Sure.

25 A Years later, when I was working in London, I went to the palace on a couple of

1 occasions.

2 Q And that is separate from the tour that you also recollect?

3 A Yes.

4 Q Because those were visits and not a tour?

5 A Those were professional visits to the palace in my role with Barclays.

6 Q And when you say "years later," when was that?

7 A That would've been from 2015 to 2021.

8 Q So the tour that you remember would've been some point before 2015?

9 A Yes.

10 Q I'd like to introduce as minority exhibit D an email chain between you and Mr. Epstein
11 from the following day, June 16th, 2010. The Bates number is EFTA01300635.

12 [Staley Minority Exhibit D.

13 was marked for identification.]

14 BY [REDACTED]

15 Q In the first email, you write, quote, "Is she free tonight?", to which Mr. Epstein responds
16 just 2 minutes later, quote, "Call me."

17 Who is "she"?

18 A I don't know.

19 Q Could it be the same woman from Eastern Europe who Mr. Epstein and
20 Mr. Mountbatten-Windsor were emailing about earlier?

21 A I don't know.

22 Q Why would you be asking Mr. Epstein if a woman was free?

23 A Again, I don't recall this email.

24 Q I understand you don't recall the email, but why would you ask Mr. Epstein if a woman
25 was free?

1 A I'm not going to speculate.

2 Q Did you call Mr. Epstein in response to his email?

3 A I don't recall.

4 Q Would you have typically called Mr. Epstein when he asked you to call him?

5 A Yes.

6 Q So you might have.

7 A I might have. But this is 16 years ago.

8 Q A few hours later, you respond, "I'm with A." Is "A" Andrew Mountbatten-Windsor?

9 A It seems like it.

10 Q What did that have to do with the previous conversation that you were having with
11 Mr. Epstein?

12 A I don't know.

13 Q Because you asked Mr. Epstein if a woman was free. He says, "Call me." And then
14 later you say, "I'm with A." So it would seem like those two things are connected, right?

15 A Don't know.

16 Q Were the two of you having dinner, as Mr. Mountbatten-Windsor had noted for
17 Mr. Epstein the day prior?

18 A It seems like it.

19 Q Do you remember that dinner?

20 A No.

21 Q Do you remember having dinners with Mr. Mountbatten-Windsor generally?

22 A No.

23 Q You don't have any recollection of any dinner with Mr. Mountbatten-Windsor?

24 A I don't think I had dinners with Mount- -- with Prince Andrew.

25 Q So, when Mr. Mountbatten-Windsor tells Mr. Epstein the two of you are having dinner

1 together, he's --

2 A It's possible.

3 Q -- wrong?

4 A No.

5 Q You just don't remember.

6 A That's correct.

1 BY [REDACTED]

2 Q Do you remember if you were ever joined by any young women from Eastern Europe?

3 A No.

4 Q Based on these documents, it looks like Mr. Epstein introduced a young woman from
5 Eastern Europe to you and Mr. Mountbatten-Windsor.

6 Your testimony today is that you don't remember if that happened, correct?

7 A That's correct.

8 Q But it could have?

9 A I don't remember.

10 Q I'd like to discuss a series of emails that you were asked about in the prior round. I
11 know you've answered some questions about these, but I have some followup questions for you.

12 I'd like to introduce as minority exhibit E an email chain between you and Mr. Epstein from
13 July 9th, 2010. The Bates number is EFTA00894090.

14 [Staley Minority Exhibit E.

15 was marked for identification.]

16 BY [REDACTED]:

17 Q In the first email, you write to Mr. Epstein, quote, "That was fun. Say hi to Snow
18 White."

19 Mr. Epstein responds, quote, "What character would you like next?", to which you reply,
20 quote, "Beauty and the Beast." Mr. Epstein then says, quote, "Well, one side is available."

21 You said in the prior round that you have no idea who this person is -- specifically, who "Snow
22 White" is. Is that correct?

23 A That's correct.

24 Q I'd like to introduce as minority exhibit F an email from the next day, July 10th, 2010.
25 The Bates number is EFTA00741531.

1 [Staley Minority Exhibit F.
2 was marked for identification.]

3 BY [REDACTED]:

4 Q The email is from a redacted individual to Mr. Epstein, saying, quote, "The Snow White
5 was f..ed twice as soon as she put her costume."

6 To be clear, that word is spelled f-dot-dot-e-d, but we understand it to mean "fucked."

7 Mr. Staley, was the Snow White who you referred to in your email the day before a young
8 woman in a Snow White costume that Mr. Epstein arranged for you to have sex with?

9 A Again, I don't recall a Snow White individual. So the answer would be no.

10 Q Did you ever have sex with a young woman in a Snow White costume?

11 A No, I did not.

12 Q Never?

13 A Never.

14 Q Why would this young woman have sent this email to Mr. Epstein if the two of you had
15 not had sex while she was wearing a Snow White costume and if Mr. Epstein had not instructed her
16 to do so?

17 A I have no idea who else she was with. I -- it has nothing to do with me, though.

18 Q But you sent an email to Mr. Epstein on July 9th.

19 A As I said, I may have -- this is in his apartment. I may have seen her in apartment and
20 prompted that email. But I was not with a person dressed as Snow White outside of potentially
21 crossing at his apartment.

22 Q So you may have seen her in his apartment, later emailed Mr. Epstein and said, "That
23 was fun," but it was not because you had sex with her?

24 A That's correct.

25 Q Why would you have asked Mr. Epstein to say hi to her then?

1 A Maybe I -- you know, again, I probably crossed her in his apartment and -- I don't know.
2 Just, say hi.

3 Q And then she emails him the next day, saying, quote, "The Snow White was [fucked]
4 twice as soon as she put [on] her costume."

5 Would you agree that's a pretty incredible coincidence, that you email him on July 9th, saying,
6 "That was fun, say hi to Snow White," and then she emails him the next day, reporting back on
7 something that just didn't have anything to do with you?

8 A Sure. Why not?

9 Q That's pretty hard to believe.

10 Mr. Sullivan. That's not a question.

11 BY [REDACTED]:

12 Q I'd like to introduce as minority exhibit G an email chain between Mr. Epstein and a
13 redacted person dated June 20th, 2010, about 2-1/2 weeks before you sent the email to Mr. Epstein
14 telling him to say hi to Snow White. The Bates number is EFTA00735698.

15 [Staley Minority Exhibit G.

16 was marked for identification.]

17 BY [REDACTED]:

18 Q In the email chain, Mr. Epstein says, quote, "I would love to take photos of you in a
19 Snow White costume. You can get it from the costume store."

20 I can represent to you based on in camera review of the unredacted version of this document
21 that this individual is the same individual who sent the email to Mr. Epstein about Snow White.

22 Mr. Sullivan. Excuse me. Forgive me. I'm confused.

23 [REDACTED]. Sure.

24 Mr. Sullivan. I think you -- I've lost track, but I think you said something that does not
25 appear on the document. Am I right?

1 Could you start again? It's only my confusion. I just didn't follow the question.

2 [REDACTED]: If you look at the first line of the email --

3 Mr. Sullivan. "Brett Ratner" --

4 [REDACTED]: -- Mr. Epstein is referring to "a big movie, Snow White." And then he says,
5 quote, "I would love to take photos of you in a Snow White costume. You can get it from the
6 costume store."

7 Do you see it?

8 Mr. Sullivan. I do.

9 BY [REDACTED]:

10 Q And I can represent to you that Mr. Epstein is sending that email to the same woman
11 who sent the email to him saying that the Snow White was fucked.

12 It appears, looking at all of these emails together, that Mr. Epstein told this young woman to
13 buy a Snow White costume and then instructed her to have sex with you while wearing it.

14 Your testimony today is that that did not happen, correct?

15 A Where is he -- where is he instructing her to have sex with me?

16 Q I said it appears, taking these emails together, that that is what is happening here.

17 He sends this woman an email on June 20th, which is about 2-1/2 weeks before you send the
18 email to him saying "say hi to Snow White," which is 1 day before she sends the email to him saying
19 that the Snow White was fucked twice.

20 Mr. Sullivan. What is the question?

21 BY [REDACTED]:

22 Q Taken together, based on these emails, it appears that Mr. Epstein told this young
23 woman to buy a Snow White costume and then instructed her to have sex with you while wearing it.

24 A I think that is speculation on your part.

25 Q Your testimony is that that is not what happened?

1 A That's my testimony.

2 Q Mr. Staley, you've previously said that you only had sex with one woman connected to
3 Mr. Epstein.

4 A That's correct.

5 Q Would you like to correct that statement?

6 A No.

7 Q You previously testified that, between July 2009 and the end of 2012, you went to Mr.
8 Epstein's New York home approximately 40 times or about once a month. Is that correct?

9 A Yes.

10 Q When you visited Mr. Epstein's New York home, did you see girls or young women in the
11 home?

12 A No.

13 Q Were there ever girls or young women in the room when you would meet with Mr.
14 Epstein?

15 A No.

16 Q Were there ever girls or young women sitting on his lap when you would talk to Mr.
17 Epstein?

18 A No.

19 Q When you visited Mr. Epstein's New York home, did you ever go to the massage room?

20 A No.

21 Q You testified previously that you did see the room, though, correct?

22 A Yes.

23 Q And you said that was part of a tour that you took of the home?

24 A Yes.

25 Q So you saw the room but you did not walk in it?

1 A Yes.

2 Q What did you see in the massage room?

3 A Again, I just saw -- like, it was a dark wall, but I don't -- I didn't really see anything in the
4 room.

5 Q Was there a massage table?

6 A I don't recall.

7 Q Was there a basket of vibrators?

8 A I didn't see that.

9 Q You previously said that you did not receive a massage in the massage room. Is that
10 correct?

11 A That's correct.

12 Q Did Mr. Epstein ever arrange massages for you anywhere else?

13 A No, he did not.

14 Q How many allegations of sexual abuse have been made against you?

15 A I think in the lawsuit against J.P. Morgan there was one allegation, but I ne- -- it was
16 never -- it was never filed with me.

17 Q So that allegation is the only one that you're aware of?

18 A Yes.

19 Q How many women have you settled sexual abuse claims with or otherwise entered into
20 NDAs with?

21 A None.

22 Q Did you ever make payments to women that you had sexual relationships with?

23 A No.

24 Q Have you ever paid or attempted to pay a minor girl for sex?

25 A No.

1 Q I'd like to introduce as minority exhibit H a memorandum to the U.S. attorney for the
2 Southern District of New York from assistant U.S. attorneys dated December 19th, 2019. The Bates
3 number is EFTA02731082.

4 [Staley Minority Exhibit H.
5 was marked for identification.]

6 BY [REDACTED]:

7 Q The document that we are handing you is an excerpt of a larger document.
8 We have marked the relevant paragraph for you.

9 [REDACTED]. On the last page.

10 BY [REDACTED]:

11 Q The memorandum describes law enforcement's October 24th, 2019, interview with a
12 survivor who Mr. Epstein started sexually abusing when she was about 20 years old.

13 As detailed in the memorandum, the survivor told law enforcement that Mr. Epstein
14 instructed her to, quote, "provide a massage to Jes Staley in Epstein's New York residence."

15 The memorandum says that, quote, "[Redacted] attempted to give him an ordinary massage,
16 but he forced [redacted] to touch his genitals and then raped [redacted]. Afterwards, [redacted]
17 complained to Epstein, who said he left it to [redacted] and Staley to decide whether to engage in
18 sex."

19 These were the allegations that you were referring to previously, correct? Or these are
20 different allegations?

21 Mr. Sullivan. He can't answer that because it would require knowledge from counsel (ph),
22 but it's the same woman that testified in the J.P. Morgan case that made a complaint to the New
23 York U.S. attorney which was not found credible.

24 BY [REDACTED]:

25 Q Did you ever force the woman to touch your genitals in the context of a massage?

1 A No.

2 Q Did you ever sexually abuse, assault, or rape a woman in the context of a massage?

3 A No.

4 Q Were you ever violent with a woman in the context of a massage?

5 A No.

6 Q I'd like to introduce as minority exhibit I an opinion in the class action that survivors of
7 Mr. Epstein's abuse brought against J.P. Morgan.

8 [Staley Minority Exhibit I.

9 was marked for identification.]

10 BY [REDACTED]:

11 Q The document we are handing you is an excerpt of a larger document.

12 On page 7, the second full paragraph reads, quote, "Plaintiffs allege that Mr. Staley had
13 first-hand knowledge of Jeffrey Epstein's sex-trafficking operation. Mr. Staley is alleged to have
14 visited Epstein's residences several times while that operation was ongoing and, during these visits,
15 observed JPM Jane Doe 'as a sexual trafficking and abuse victim.'"

16 On page 8, the first full paragraph reads, quote, "Plaintiffs further allege that Mr. Staley
17 himself abused some of Epstein's victims, including JPM Jane Doe herself. JPM Jane Doe claims that
18 'one of Mr. Epstein's friends' -- whom she later identified as Mr. Staley -- 'used aggressive force in his
19 sexual assault of her and informed [JPM Jane Doe] that he had Epstein's permission to do what he
20 wanted to her.'"

21 Did you sexually abuse and assault girls or women that you met through Mr. Epstein?

22 A No.

23 Q Did you ever tell a girl or a woman who Mr. Epstein abused or trafficked that you had
24 Mr. Epstein's permission to, quote, "do what you wanted with her"?

25 A No.

1 Q Mr. Staley, we have credible information that you have aggressively, even violently,
2 sexually assaulted multiple women connected to Mr. Epstein. We are concerned that you are not
3 being truthful in your answers.

4 Are there any statements that you have made today that you would like to correct for the
5 record?

6 A No.

7 [REDACTED] With that, we'll pause and go to Members for questions.

8 Ms. Ansari. As you know, while he was in jail at the Palm Beach stockade, Mr. Epstein was
9 allowed to leave the stockade for 12 hours a day, 6 days a week, ostensibly to work for his
10 organization, the Florida Science Foundation, as part of the work release that he secured.

11 Were you aware at the time that Mr. Epstein established the Florida Science Foundation in
12 November of 2007 just months before he pleaded guilty and that he dissolved it soon after his
13 sentence was completed?

14 Mr. Staley. No. I knew he used an office building on work release when he was in jail in
15 Florida, but I didn't know how he constructed it and whatnot.

16 Ms. Ansari. So you weren't aware of the details of the foundation that was created.
17 When did you become aware of the timeline in terms of the office that he used?

18 Mr. Staley. I think he told me that he was on work release and -- so -- I was -- I traveled a
19 lot, and one time we found a date where he was on work release and I could visit him in his office
20 building.

21 Ms. Ansari. So, to be clear, were you aware that there was a Florida Science Foundation?

22 Mr. Staley. No, I was not.

23 Ms. Ansari. You were never aware of that?

24 Mr. Staley. There was a Florida Science Foundation? No.

25 Ms. Ansari. Yes. That is the organization that he created. So --

1 Mr. Staley. No, I wasn't.

2 Ms. Ansari. -- you were not aware? Okay.

3 Regardless of that, did you have any concerns about the fact that he was able to get work
4 release and go to an office for that many hours per day?

5 Mr. Staley. No.

6 Ms. Ansari. Are you aware now that some survivors have stated that Mr. Epstein abused
7 them at the Florida Science Foundation offices?

8 Mr. Staley. No.

9 Ms. Ansari. Are you aware that some of the women were hired as Florida Science
10 Foundation staff?

11 Mr. Staley. No.

12 Ms. Ansari. So, to this day, you have never heard that, even though there's been public
13 testimony?

14 Mr. Staley. No.

15 Ms. Ansari. Okay.

16 One of those women told this Committee that, quote, "Jeffrey offered me a position at the
17 Florida Science Foundation to handle phone calls to help with my financial troubles. One day, his
18 masseuse called me into a room, where I was molested by Epstein. For the following 3 years, I was
19 subject to ongoing rape and stripped of my dignity. Jeffrey Epstein was under house arrest for the
20 molestation of underage girls at the exact same time that he was abusing me."

21 Mr. Staley, you visited Mr. Epstein while he was on work release in Florida. Is that correct?

22 Mr. Staley. Once.

23 Ms. Ansari. Once. Why did you visit him there?

24 Mr. Staley. He was in jail and serving time for his offense that he pleaded to.

25 Ms. Ansari. Uh-huh.

1 Mr. Staley. I had known him for a number of years and -- and decided that I should go visit
2 him and did.

3 Ms. Ansari. So it was a friendly visit?

4 Mr. Staley. Yeah, I mean, it was -- yeah.

5 Ms. Ansari. Do you recall how long you were there?

6 Mr. Staley. There was a sheriff there, and it lasted -- I think I was there for --

7 Ms. Ansari. At the office or at the jail?

8 Mr. Staley. At the office.

9 Ms. Ansari. Okay.

10 Mr. Staley. And I was there for less than an hour.

11 Ms. Ansari. Did you participate in sexual abuse of any women at the Florida Science
12 Foundation offices?

13 Mr. Staley. No. And, again, there was a police officer there while I was there.

14 Ms. Ansari. And were you aware that Mr. Epstein was sexually abusing women at those
15 offices?

16 Mr. Staley. No. It seemed incredible to me that if he is in jail for offenses that he would do
17 something like that.

18 Ms. Ansari. Okay.

19 That's my questions. Thank you.

20 Ms. Stansbury. One quick followup on Representative Ansari's questions.

21 You visited the office of the Florida Science Foundation, correct?

22 Mr. Staley. I didn't realize what the Florida Science Foundation -- but I visited Epstein in an
23 office building, correct.

24 Ms. Stansbury. Okay. So your testimony is that you visited him in an office building for
25 some organization that you had no knowledge of and were generally unaware of.

1 Mr. Staley. That's correct.

2 Ms. Stansbury. Okay.

3 Can I ask a quick followup? Sorry.

4 So I guess what I'm struggling with is generally to understand your testimony. So the
5 incident that was just described by Rep. Ansari happened in 2007, and the --

6 The Reporter. The microphone.

7 Ms. Stansbury. Okay. Oh, I'm sorry.

8 Okay. This is just a quick followup question.

9 So, in terms of the incident that was just described by Representative Ansari of your visit to
10 the Florida Science Center, happened in 2007. And your testimony that you just gave is that you
11 remember it was less than an hour, you remember who was present, including a sheriff, correct?

12 Mr. Staley. That's why I don't -- whether we're talking about the same visit. Because he
13 was incarce- --

14 Mr. Sullivan. Excuse me. Excuse me. He could not have been in jail in 2007. He had
15 not pled guilty until July of 2008.

16 Ms. Stansbury. Oh, okay, 2008. So 20- -- what -- but the date is 2007 or 2008.

17 Mr. Staley. No --

18 Ms. Stansbury. But yet the incidents --

19 Mr. Sullivan. Listen -- I'm sorry. I'm --

20 Ms. Stansbury. But the followup question that I'm asking is actually not about that incident.
21 It's more to establish the relevance that you recall the location, you recall the setting, you recall the
22 persons who were present.

23 But when you were asked extensively by our counsel about these incidents involving young
24 women, including the so-called Snow White person, which happened years later in 2010, you're
25 claiming you have no knowledge and no memory of these exchanges that you had with Mr. Epstein

1 and engagement with these women?

2 Mr. Staley. Again, that's a long question.

3 So I met in an office building in Florida, I believe it was 2009. But I have -- I do not have any
4 recollection of Snow White.

5 Ms. Stansbury. But your testimony here today is that you --

6 Mr. Staley. No. So --

7 Ms. Stansbury. -- clearly remember an incident in which --

8 Mr. Staley. And, again, when I was at the office building with Epstein in 2009, there was a
9 sheriff --

10 Ms. Stansbury. Yes.

11 Mr. Staley. -- in the same office the whole time.

12 Ms. Stansbury. But the question is about your memory. You're claiming that you can
13 remember this interaction you had with Mr. Epstein when you went and made a friendly visit while
14 he was doing his sentence, but you have no recollection of these emails and exchanges you had over
15 a woman that was referenced as "Snow White" years later? That's your testimony here today?

16 Mr. Staley. Yes, it is.

17 Ms. Stansbury. Okay. That's ridiculous.

18 But thank you.

19 Mr. Subramanyam. Thank you for coming in today.

20 Were you personally involved in conversations related to whether Jeffrey Epstein was a
21 bank of -- a client of the bank?

22 Mr. Staley. Yes.

23 Mr. Subramanyam. Did you actively defend him when he was trying to get accounts?

24 Mr. Staley. No. I left it to the bank's compliance department, legal department, and
25 Private Bank to determine whether he maintained an account.

1 Mr. Subramanyam. So at no point did you ever tell your colleagues that you vouched for
2 him in any way or that you support him opening different accounts at the bank?

3 Mr. Staley. I went to visit him when allegations came out in 2006, and I said he
4 was -- appeared shocked and he denied the ages. But I let the bank and its compliance department,
5 legal department, and the Private Bank determine what and what type of business Epstein would
6 continue to do with the bank or not.

7 Mr. Subramanyam. But at no point did you ever say, we should bank this guy, we should let
8 him open accounts, and, you know, what he did in the past shouldn't play into that?

9 Mr. Staley. The bank dramatically restricted what it would do with -- and what it would
10 allow Epstein to do with the bank, and I, you know, supported what the bank's decision was.

11 Mr. Subramanyam. And the bank restricted it based on what criteria? Why would the
12 bank restrict him?

13 Mr. Staley. I think, given his -- given what he was charged with, the bank, you know, made
14 the decision to no longer, basically, allow him to engage with the Private Bank in investment
15 activities, which is principally what they do. And I supported that decision.

16 Mr. Subramanyam. But what was he allowed to do with the bank?

17 Mr. Staley. I think, basically, what he was left with was simply a checking account.

18 Mr. Subramanyam. A checking account.

19 And did you ever speak to Mr. Jamie Dimon about Mr. Epstein?

20 Mr. Staley. Yes.

21 Mr. Subramanyam. When was that?

22 Mr. Staley. I believe once in 2006 when Epstein was indicted, and I believe once in 2008
23 when Epstein went to jail.

24 Mr. Subramanyam. And did you speak to him about Mr. Epstein's charges?

25 Mr. Staley. Mr. Epstein's --

1 Mr. Subramanyam. Did you speak to Mr. Dimon about Mr. Epstein's charges?

2 Mr. Staley. Again, I think I -- in 2006, I think I just mentioned that a client of the bank,
3 Jeffrey Epstein, had been indicted.

4 Mr. Subramanyam. So you did not speak to Mr. Dimon -- because I believe you've said
5 under oath that you've spoken to him about the fact that Mr. Epstein pleaded guilty to one count of
6 soliciting prostitution and one count of soliciting prostitution from a minor. Do you --

7 Mr. Staley. That was -- the was the second conversation.

8 Mr. Subramanyam. That was the second conversation? So you did talk to him.

9 So -- because Mr. Dimon had said under oath that he does not recall knowing anything about

10 Mr. Epstein until Federal prosecutors charged Mr. Epstein with sex trafficking in 2019. So I'm just

11 trying to understand why there's two recollections here.

12 Mr. Staley. I don't know.

13 Mr. Subramanyam. Okay.

14 That's all of my questions.

15 Mr. Walkinshaw. Thank you, Mr. Staley. I'm James Walkinshaw from Virginia's 11th
16 District.

17 The New York Times reported last year that, in 2011, you informed Mr. Epstein that
18 there were concerns inside J.P. Morgan about his large and regular cash withdrawals.

19 Did you talk to Mr. Epstein about those concerns that existed within J.P. Morgan about his
20 large cash withdrawals?

21 Mr. Staley. Do you have -- can I see a transcript of that? Or --

22 Mr. Walkinshaw. Yeah. I don't know -- what is the exhibit number? I think we have
23 the -- exhibit J, a September 8, 2025, New York Times article, "How JPMorgan Enabled the Crimes of
24 Jeffrey Epstein."

25 [Staley Minority Exhibit J.

was marked for identification.]

Mr. Walkinshaw. And my pages aren't numbered, but it's page -- page 23. See the paragraph on page 23 at the -- it's the first full paragraph, "At the request of Langford and other executives"?

Oh, I'm sorry. Is that the wrong one?

Yeah, I'm sorry. The paragraph starts, "Staley and at least one other executive alerted Epstein."

Mr. Sullivan. I think he wants you to read this.

Mr. Staley. Yeah. Let me read the -- yeah.

██████████. If you need a few minutes to read it, we can go off the record.

Mr. Staley. Okay. Thank you.

██████████. We'll go off the record now.

[Discussion off the record.]

1 [12:17 p.m.]

2 [REDACTED]: We are back on the record.

3 Mr. Walkinshaw. Okay. Mr. Staley, in or around 2011, did you alert Mr. Epstein about J.P.
4 Morgan's heightened sensitivity about his constant cash withdrawals?

5 Mr. Staley. That's what this article says, yes.

6 Mr. Walkinshaw. Do you recall alerting him to that heightened sensitivity?

7 Mr. Staley. Again, I don't recall the actual engagement, but quite possibly, yes.

8 Mr. Walkinshaw. Okay. So --

9 Mr. Staley. But I think I did, and I think Mary Erdoes did as well.

10 Mr. Walkinshaw. I'm sorry, can you say the name again?

11 Mr. Staley. I think I may have and Mary Erdoes.

12 Mr. Walkinshaw. Okay. So your testimony is you may have alerted Mr. Epstein to the
13 bank's concern about the --

14 Mr. Staley. Yes, yes.

15 Mr. Walkinshaw. Okay. When you, perhaps, informed Mr. Epstein that the bank was
16 concerned about these cash withdrawals, were you trying to help him alter his behavior to avoid
17 additional scrutiny?

18 Mr. Staley. No.

19 Mr. Walkinshaw. What would have been your purpose of alerting him to this sensitivity
20 within the bank about his cash withdrawals? Why would you have done it?

21 Mr. Staley. I was more sort of asking him, is that true?

22 Mr. Walkinshaw. Is -- well --

23 Mr. Staley. Was he taking, you know, large cash withdrawals.

24 Mr. Walkinshaw. So, presumably, though, your colleagues at the bank would have told you
25 that he was making large cash withdrawals, so why would you need to ask him?

1 Mr. Staley. Just, I guess, rhetorically, saying that the bank is asking about large cash
2 withdrawals.

3 Mr. Walkinshaw. Okay. But it wasn't for the purpose of helping him to change his
4 behavior so there wouldn't be additional uncomfortable questions asked within the bank?

5 Mr. Staley. Again, I always let the private bank and -- you know, and its staff to -- if they had
6 issues with Epstein, to take it with Epstein. If they had issues with his accounts, to do what they
7 deemed to be appropriate. I never stood in the way of that.

8 Mr. Walkinshaw. But in this instance, you, perhaps, interfered?

9 Mr. Staley. I wouldn't call that interference. I was saying that the bank --

10 Mr. Walkinshaw. You made a decision to tell -- perhaps to tell him that there were concerns
11 within the bank. You weren't allowing others within the bank to handle it.

12 Mr. Staley. No. I think other people -- as I said, I think Mary Erdoes talked to him as well.

13 Mr. Walkinshaw. Okay. By this time in 2011, there had been media reports that
14 Mr. Epstein paid his victims in cash.

15 Did you ever have conversations either with Mr. Epstein or with your colleagues at J.P.
16 Morgan as to the fact that perhaps Mr. Epstein was paying sexual abuse victims with these cash
17 withdrawals that you discussed with him?

18 Mr. Staley. No.

19 Mr. Walkinshaw. Did it ever cross your mind that perhaps these large cash withdrawals that
20 you were aware of were related to either sexual abuse or him having sex with girls or young women?

21 Mr. Staley. You know, you can go to jail for, you know, a year and you've been convicted of
22 abusing minors, it's just incredible to me that he would continue to do it after he got out of jail.

23 Mr. Walkinshaw. At this point, you're a senior executive at J.P. Morgan. I presume over
24 the course of your career, you attended trainings, briefings, with respect to the role of banks and
25 large cash withdrawals in human trafficking and sex trafficking. Is that correct?

1 Mr. Staley. I was sensitive to large cash withdrawals, yes.

2 Mr. Walkinshaw. Okay. So you have Jeffrey Epstein, who is a convicted sex offender, you
3 then have knowledge he's making large cash withdrawals, you see him regularly in the presence of
4 young women --

5 Mr. Staley. No.

6 Mr. Walkinshaw. -- and it never once crossed your mind that these large cash withdrawals
7 might have been connected to any of the women that you saw in his presence?

8 Mr. Staley. Again, I did not see young women in his presence, so that part of your question,
9 I think, is unfair.

10 Mr. Walkinshaw. How would you define young women?

11 Mr. Staley. Again, what I -- I saw him with his assistants, and I would say they were in their
12 late 20s, early 30s.

13 Mr. Walkinshaw. Okay. That's my time. Thank you.

14 [REDACTED]. We'll go off the record.

15 [Recess.]

1 [12:57 p.m.]

2 Mr. Ashworth. I just want to correct the record real quick for something that a Member of
3 the minority said outside to the press. There has not been any limitation on the scope of today's
4 interview.

5 BY MR. EMMER:

6 Q Mr. Staley, during the previous hour, you were asked if you had visited Little Saint
7 James. Is that right?

8 A Yes.

9 Q You were also asked if you had visited Great Saint James, correct?

10 A Correct.

11 Q And when you were asked about Great Saint James, you answered in the affirmative.
12 Was that the correct testimony?

13 A No. I misspoke. Great Saint -- I've never visited Great Saint James.

14 Mr. Emmer. Thank you.

15 BY MS. BRIGNAC:

16 Q Mr. Staley, you mentioned that you frequently visited Mr. Epstein's Manhattan town
17 house at least dozens of times.

18 For what purpose did you attend these meetings?

19 A Generally, it would be on my way home. It would be to sit and talk with Epstein about
20 what was going on both economically, politically, financial world, talked about what I was doing at
21 the bank, talked about people that he introduced me to as part of his network.

22 So general conversations around business and around the network that he had, and it was of
23 interest to me.

24 Q Did your meetings always take place at his Manhattan town home?

25 A Yes.

1 Q Why?

2 A He used his dining room there as his office. So oftentimes when I would go there,
3 there would be other people there meeting with him. So that was generally where he met people.

4 Q Can you list who else would have attended these meetings with you?

5 A Well, not with me, but that we would have crossed.

6 Q Yes.

7 A People like Larry Summers, people like Sergey Brin, people like Ehud Barak. That type
8 of people.

9 Q To clarify, were these people at the meeting or you would discuss them at the
10 meetings?

11 A We would cross. So I would come and Ehud Barak would be talking with Epstein. I
12 would show up. We would sort of overlap for a bit of time and then Ehud Barak would leave.
13 That -- it would be more of that type of engagement.

14 Q Did anyone else attend the meetings with you and Mr. Epstein?

15 A No.

16 Q Did you ever see any young women around the Manhattan town house?

17 A No, I did not.

18 Q Did you ever see his assistants around the Manhattan town house?

19 A Yes.

20 Q Who?

21 A Lesley Groff mostly, Sarah Kellen, [REDACTED] Yeah, those would be the principal ones.

22 Q Did you ever attend a party at his Manhattan town house?

23 A A party, no. I don't believe -- no, I never attended a party there.

24 Q Did you ever have a drink at his Manhattan town house?

25 A Yes. Sometimes he would serve me a glass of wine.

1 Q Did you ever become intoxicated to the point where you would likely not remember
2 things that happened today?

3 A No.

4 Q Before, during, or after a meeting with Mr. Epstein, were you ever introduced to young
5 women or girls?

6 A No.

7 Q I'm entering majority exhibit 6 into the record. This is an email from Lesley Groff to
8 Mr. Epstein on September 23rd, 2014, with the Bates stamp EFTA00362214.

9 Ms. Brignac. And we'll go off the record so you can review.

10 [Staley Exhibit No. 6.

11 was marked for identification.]

12 BY MS. BRIGNAC:

13 Q We'll go back on the record.

14 What were you meeting with Mr. Epstein about on September 23rd, 2014?

15 A I don't recall what the meeting was about. Seemed like I was just stopping by to say hi.

16 Q Did any girls join you during a conversation with Mr. Epstein?

17 A No.

18 Q Did you see any girls before or after saying hello to Mr. Epstein?

19 A No, I did not.

20 Q Do you know who the BBB girls are?

21 A No, I don't.

22 Q Who is Barbro Ehnborn (ph)?

23 A I don't know.

24 Q Has [REDACTED] ever attended a meeting with you and Mr. Epstein?

25 A I don't know who that is.

1 Q We do have DOJ documents that reflect [REDACTED] did attend a meeting with you
2 and Mr. Epstein.

3 Do you -- there was ever a meeting, do you recall where a young woman attended with you
4 and Mr. Epstein?

5 A I don't know [REDACTED] so I don't recall that, no.

6 Q I'll now ask names that have been recorded in the press as attending Mr. Epstein's town
7 house meetings. Can you confirm whether you were present for another individual's meeting with
8 a yes or no?

9 A What individual?

10 Q I'm going to give you a list of names and just give me a yes or no if you ever attended a
11 meeting with this individual --

12 A Okay.

13 Q -- at Mr. Epstein's town house. Bill Gates?

14 A Yes.

15 Q Steve Bannon?

16 A No.

17 Q Woody Allen?

18 A We crossed.

19 Q President Bill Clinton?

20 A No.

21 Q Noam Chomsky?

22 A I don't know.

23 Q Tom Pritzker?

24 A Yes.

25 Q Reid Hoffman?

1 A No.

2 Q Mort Zuckerman?

3 A Yes.

4 Q Dick Cavett?

5 A No.

6 Q Ehud Barak?

7 A Yes.

8 Q Leon Black?

9 A Yes.

10 Q Did any of the individuals you just listed engage in sexual misconduct during these visits
11 that you said yes to?

12 A No.

13 Q Can you describe the circumstances under which you met Bill Gates?

14 A I met Bill Gates a couple of times in Seattle when I was there on business trips. I met
15 him at a conference I believe was hosted by Microsoft. That's my recollection of when I met him.

16 Q Who introduced you to Mr. Gates?

17 A Jeffrey Epstein.

18 Q Was he a client of Mr. Epstein's?

19 A I don't know. I don't think so.

20 Q Did he ever refer -- strike that.

21 Did Mr. Epstein ever refer Bill Gates as a client to J.P. Morgan?

22 A I think Bill Gates was already a client of J.P. Morgan, my recollection, but -- but I'm not
23 sure.

24 Q Were you involved in Mr. Epstein's pitch to J.P. Morgan regarding the donor-advised
25 fund for the Bill and Melinda Gates Foundation?

1 A Yes.

2 Q What was your role?

3 A I just was aware of it. I think it was being handled by Mary Erdoes.

4 Q What was this fund?

5 A I think the idea was to create a fund for charity that where the Private Bank would
6 approach high-net-worth individuals to participate in the fund, and Bill Gates would be a major
7 sponsor of it.

8 Q Was Mr. Epstein compensated by his work on this deal?

9 A Not by J.P. Morgan.

10 Q Who would he -- was he compensated by anyone?

11 A I don't know. The deal never happened, so --

12 Q Why did the deal never happen?

13 A I just think it just never came together as a concept.

14 Q How did you meet Tom Pritzker?

15 A I think I just met Tom Pritzker. He's a client of the bank.

16 Q Do you recall what you met with him about with Mr. Epstein?

17 A Again, I'm not sure I met with Tom with Mr. Epstein. My recollection is I met with Tom
18 Pritzker at their headquarters.

19 Q Did you work with Mr. Epstein on any deal for Mr. Pritzker?

20 A I don't think so, no.

21 Q The Wall Street Journal has reported in March of 2026 that you divulged confidential
22 information to Mr. Epstein regarding financial dealings that JPMorgan Chase was working on.

23 What information did you divulge?

24 A What year?

25 Q This was reported in 2026, but the deal that they found was in 2008.

1 A Do you know which deal they're talking about?

2 Q A deal for the Pritzker family.

3 A I don't -- no, I don't recall what the deal was.

4 Q Would it be accurate to say that you divulged bank communications with the Federal
5 Reserve on how to stabilize the financial system?

6 A Yes.

7 Q Did you divulge any other market-moving information to Mr. Epstein?

8 A Ask the question again. Sorry.

9 Q Did you divulge any other market-moving information to Mr. Epstein?

10 A I don't think so, no.

11 Q Would it be accurate to say you also divulged that J.P. Morgan was inundated by \$44
12 billion in new assets within 2 weeks?

13 A That's possible, yes.

14 Q So is there any other information that you divulged to Mr. Epstein?

15 A It was a long time ago you're talking, so I apologize, I can't answer it.

16 Q I would still like an answer to the question, though.

17 Is there any other information that you divulged?

18 A That I recall, no.

19 Q Did you discuss J.P. Morgan salaries with Mr. Epstein?

20 A I discussed my salary with Mr. Epstein, yes.

21 Q Did you understand at the time that sharing this information was in violation of your
22 fiduciary duties to the bank?

23 A No.

24 Q Why did you share this information to Mr. Epstein?

25 A To get his thoughts and ideas about it.

1 Q Did Mr. Epstein benefit from any of the information you divulged?

2 A No. That I'm aware of, no.

3 Q How did you meet Mort Zuckerman?

4 A I think I met him through Jeffrey Epstein.

5 Q Why did he introduce you to Mort Zuckerman?

6 A I think he was thinking of doing -- of starting a publication with Mort Zuckerman. I
7 think we just crossed.

8 Q How did you meet Ehud Barak?

9 A I met Ehud Barak at Jeffrey Epstein's town house, and then we met in Israel. We also
10 may have met in Davos.

11 Q Did you form a relationship with Mr. Barak after this introduction?

12 A More when he and I met in Israel, we developed a relationship, but no. Yeah. But
13 not -- I didn't stay in regular contact with him or something like that.

14 Q Have you ever flown on any of Mr. Epstein's private aircraft?

15 A Yes.

16 Q How many times?

17 A I think I flew on his 727 once. I think I flew on his Gulfstream plane once or twice.

18 Q What were the occasions for this travel?

19 A I think once when we were going to his island with my family, I believe once was going
20 to Miami. I think I flew by myself on that flight. That's what I recall.

21 Q Who was present on the other flights?

22 A The 727 flight?

23 Q Yes. You said on one occasion I flew alone. So who else was present on the other
24 flights?

25 A My family.

1 Q On how many trips was your family present with you on the travel?

2 A The whole family, just one. Yeah, just one.

3 Q Were members of your family present on other travels?

4 A No. I think it was just the one travel to the Virgin Islands.

5 Q Why did they attend this trip?

6 A It was just -- I think my family went, I think the Dubins went. It was just -- we were
7 invited by Epstein to go to his island, so my family and I went for a couple days.

8 Q This was in February 2005, correct?

9 A I think that's right.

10 Q Did you ever witness young women or girls while traveling on Mr. Epstein's plane?

11 A No, I did not.

12 Q Did you ever witness sexual activity on his plane?

13 A No.

14 Q Has Mr. Epstein ever flown on a private plane of yours?

15 A I've never owned a private plane.

16 Q Have you ever heard of sexual activity taking place on Mr. Epstein's plane?

17 A No.

18 Q In 2005, police in Palm Beach, Florida, began investigating Mr. Epstein for soliciting
19 prostitution from minors.

20 When did you first become aware of the investigation in 2005, 2006?

21 A I think when -- when it was printed in the Palm Beach Press.

22 Q When would this have been?

23 A I'm not exactly sure. 2005, 2006.

24 Q Have you -- strike that.

25 Was JE ever on a plane leased or operated by you?

1 A No.

2 Q Was Jeffrey Epstein ever on a plane leased or operated by you?

3 A I've never leased or operated an airplane.

4 Q So you became aware of the investigation, you believe, sometime in 2005, 2006 when it
5 was published in the press.

6 What did you do next?

7 A I think -- I believe I went to his office and asked him. And I reported back to the bank
8 that I went and asked him and reported that he was shocked, or he seemed shocked, that he denied
9 the ages. And I reported that back in an email to the bank.

10 Q What did you say that led you to find him credible in that moment?

11 A I've known Epstein for a number of years, and his reaction seemed to be genuine. But
12 again, I just reported what I heard from him and saw to the bank so the bank had that.

13 Q Who did you report it to at the bank?

14 A Well, I put it in an email. So I know it went to Mary Erdoes, but -- I may have also -- I
15 may have also reported it to Langford, who I believe was a lawyer for the Private Bank at the time.

16 Q What were their responses?

17 A I think my recollection is the bank had a group called the rapid response team at
18 compliance, and they were responsible for, I think, reviewing things like this, and I believe the bank
19 did review Epstein.

20 Q And it published a report on this, correct, a rapid response report?

21 A I believe so.

22 Q There were internal discussions at this time. Who all participated in these discussions?

23 A I think it was members of the rapid response team. I think it's members from legal,
24 from compliance, the people who ran his banking group, but I was not part of those meetings.

25 Q Were you a part of any of the meetings?

1 A Of the rapid response team? Not that I recall, no.

2 Q When you reported it to Mary Erdoes and --

3 A Langford.

4 Q -- Langford, what did you say?

5 A I said, this is -- this is something that -- I think both Mary and I said this is something very
6 concerning, and let's let the bank look into it and decide what to do.

7 Q Why did they not part ways with Mr. Epstein at that time?

8 A My understanding is the bank restricted his activities significantly within the bank. And
9 while looking back, it may not seem as such, but back then that was a major move by the bank. And
10 I think for that moment in time, that deemed sufficient withdrawal of the bank from Epstein's
11 business activities.

12 Q How many meetings took place on this?

13 A I don't know how often the rapid response team met.

14 Q For the record, the committee has reviewed documents that reflect at least five to six
15 meetings on this topic.

16 In July 2006, Mr. --

17 A Also, those rapid response meetings would also -- I think were filed with the Federal
18 Government.

19 Q Thank you. In July 2006, Mr. Epstein was arrested for the first time for soliciting
20 prostitution from minors.

21 Did you discuss the allegations with Mr. Epstein?

22 A Yes.

23 Q Can you describe what happened in that conversation?

24 A Again, he said he was shocked by the allegation, he denied it, and he denied the ages.

25 Q Palm Beach Detective Joseph Recarey spoke out about his belief that Epstein was tipped

1 off about the raid since multiple computers expected to be at the house were missing when the
2 search warrant was executed.

3 Did anyone tip off Mr. Epstein to this raid?

4 A I have no idea.

5 Q Did you ever hear of anyone informing Mr. Epstein about the impending search
6 warrant?

7 A No.

8 Q Were you surprised by his arrest?

9 A Sure.

10 Q Why?

11 A Because I had known Epstein for a number of years. Again, he was involved with
12 things like the Highbridge Capital transaction, and someone who you know gets arrested for sex with
13 a minor, that's shocking.

14 BY MS. TOLAN:

15 Q What exactly did Mr. Epstein tell you had occurred that led to his arrest?

16 A I think there was press about victims reporting to authorities that they were victimized.
17 I think that's what prompted it.

18 Q But did he tell you his side of the story --

19 A No.

20 Q -- or did he tell you something different?

21 A No.

22 BY MS. BRIGNAC:

23 Q So on his arrest, it's published in the press more people are becoming aware, did you
24 begin to hear any rumors about his conduct with minors or young women?

25 A Just what I read in the press.

1 Q But did you discuss it with anyone else in your financial circles? Did any more
2 information become available as you began to discuss it with others?

3 A Separate from the press, I don't believe so.

4 Q The FCA says that they doubted you were surprised at the arrest given all of the reports
5 and allegations that you were aware of by then.

6 A In 2006?

7 Q Correct. The FCA found that the bank at large was well aware, and that by 2006, the
8 reports and allegations he was facing caused them doubt to believe that you would have been
9 surprised.

10 A Are you sure that's 2006? I think the bank was as surprised as I was.

11 Q The FCA said that by 2006, but definitely by 2010 --

12 A That's --

13 Q -- J.P. Morgan was aware given Mary Erdoes' testimony.

14 A That's 4 years. So let's ask the question in the context of 2010.

15 Q So my question to you is, why do you think the FCA stated that they doubt you were
16 surprised by the allegations?

17 A I think in 2010, I would not have been surprised by the allegations.

18 Q Why?

19 A He had gone to jail for it.

20 Q So at that time you did understand that he was soliciting prostitution from minors?

21 A He had pleaded guilty, and he had gone jail.

22 Q Thank you.

23 Ms. Tolan. And just one quick follow-up on the rapid response meetings that we were
24 discussing a moment ago. Why were you not part of that team or those meetings?

25 Mr. Staley. Because I was not part of the rapid response team.

1 [Staley Majority Exhibit No. 7.
2 was marked for identification.]

3 BY MS. BRIGNAC:

4 Q I would like to enter into the record majority exhibit 7. This is an email exchange
5 between you, Mr. Staley, and Mr. Epstein on November 1st, 2009. It is Bates stamped
6 EFTA00768032.

7 Ms. Brignac. We'll go off the record to pass this out and give you a moment to review.
8 We'll go back on the record.

9 BY MS. BRIGNAC:

10 Q So on November 1st, 2009, you emailed Mr. Epstein, "So when all hell breaks loose and
11 the world is crumbling, I will come here and be at peace. Presently, I'm in the hot tub with a glass
12 of white wine. This is an amazing place. Truly amazing. Next time we're here together.

13 I owe you so much, and I deeply appreciate our friendship. I have few so profound."

14 Mr. Staley, what prompted you to send this email?

15 A I believe this is when I visited his ranch. I was in Albuquerque on business, and my
16 understanding was he had the largest ranch in the State of New Mexico.

17 He was not there, but as I was going to travel home that day, I asked if I could stop by and see
18 his ranch. There was a couple taking care of the ranch. I was there.

19 They happened to have saddled a horse for me. I ride horses. So I went for a quick ride on
20 a horse, got off, and I remember in the basement of the house was, like, a spa area with a big
21 swimming pool.

22 And I went there and -- to take a shower and change, and I believe there was a -- I took a
23 shower and jumped into his hot tub. I think there was a mini bar, and I grabbed a glass of white
24 wine, and I later sent him this email.

25 Q What did you mean by, "I owe you so much"?

1 A You know, he had been helpful in my career, he had done -- he was instrumental in the
2 Highbridge transaction. He had given me, you know, advice along the way. And I was visiting this
3 extraordinary ranch, and as I said, I use effusive language. And that's what I was doing.

4 Q You testified earlier that you understood that he did solicit prostitution from minors
5 when he pled guilty. He pled guilty in 2008, and you sent this email in 2009.

6 So why did you maintain your friendship with Mr. Epstein who had solicited prostitution from
7 minors?

8 A Again, it's inconceivable to me that he would have continued, and I thought he had paid
9 his fine. He had gone to jail. My expectation was he would have reformed himself. And so I
10 maintained the relationship because he had done a number of viable things to me in my career.

11 Q So you maintained your relationship with a sex offender because he did valuable things
12 to your career --

13 A I thought it was a one-off event. And so, I did not think that he was a -- I'll leave it at
14 that.

15 Q Why did you believe he would reform himself?

16 A Because I would think if you would go -- if you spent time in jail, the last thing you would
17 do is repeat the behavior that put you into jail.

18 Q Mr. Staley, you seem to have great recollection about this ranch and all of the events
19 that took place there in 2009, but you cannot remember the Snow White events of July 2010 based
20 on your memory.

21 Can you help reconcile my confusion on this?

22 A One thing, getting in the car, driving an hour, going to a ranch, riding on a horse, seeing
23 a whole new environment, you know, using the spa, the whole thing surrounding it, that was -- as
24 opposed to someone who apparently I crossed, you know, for a few minutes, I think, is quite a
25 difference.

1 Q Do you normally see young women in Halloween costumes at your friends' houses?

2 A Again, I don't recall that I met someone in a Halloween costume.

3 Q But you said you may have?

4 A I don't --

5 Q That's not an event you recall?

6 A I don't remember seeing a Snow White.

7 Ms. Tolan. And when you visited his ranch, did you see anyone else there besides the
8 couple who worked there?

9 Mr. Staley. No. Just the couple and the horse.

10 BY MS. BRIGNAC:

11 Q On your visits to any of Mr. Epstein's properties, did you see anything unusual?

12 A No.

13 Q It's been reported that Mr. Epstein kept nude photographs in his home. Did you ever
14 see nude photographs?

15 A No.

16 Q Did you ever see unusual artwork?

17 A Yes.

18 Q What did you see?

19 A The one that stands out is he had a painting of someone reclining in a chair with, like,
20 sort of a dress on with the head of President Clinton.

21 Q Do you know why he had this photograph?

22 A No.

23 Q Did you ever ask about it?

24 A I think he saw it as sort of a joke.

25 Q In prior sworn testimony you've stated that over 25 individuals and entities were

1 referred to the bank by Mr. Epstein, to include Sergey Brin, Google, Sultan Ahmed bin Sulayem, Ehud
2 Barak, Peter Mandelson, Mort Zuckerman, LeFrak family (ph), Highbridge Capital Management,
3 Glenn Dubin, Eva Dubin, Andrew Farkas, Kathryn Ruemmler, Bill Gates, Leon Black, Boris Nikolic,
4 David Gergen, Larry Summers, Nathan Myhrvold, Kimbal Musk, Elon Musk, Les Wexner, Bill
5 Richardson, and George Mitchell. Is that correct?

6 A Yes.

7 Q Did Mr. Epstein also facilitate meetings between individuals at J.P. Morgan with Andrew
8 Mountbatten-Windsor, formerly known as Prince Andrew?

9 A I don't believe so.

10 Q I believe you previously testified that he did.

11 A That he did.

12 Q Is your testimony --

13 A So ask the question again. Sorry.

14 Q -- different today?

15 Has Mr. Epstein facilitated meetings between individuals at J.P. Morgan with Andrew
16 Mountbatten-Windsor, formerly known as Prince Andrew?

17 A Yes. Sorry. Apologize.

18 Q Thank you. Why did Mr. Epstein refer these clients to J.P. Morgan?

19 A I think it was part of him building out his network, and I think -- in hindsight, I think what
20 he was doing was -- you know, we thought that he was introducing us to these people as -- to help
21 J.P. Morgan. And I think he was showing to these individuals that he was connected to J.P. Morgan
22 to build his credibility.

23 Q Did all of these referrals eventually become clients of J.P. Morgan?

24 A I think many of them were already clients, actually, and some of them became clients,
25 yes. Like Larry and Sergey Brin of Google became clients on the back of that.

1 Q Did you benefit from any of these client referrals?

2 A I mean, if you're running the Private Bank and you get introduced to three of the five
3 wealthiest men potentially in the world, yeah, that's a valuable thing.

4 Q But did it actually benefit you in your career? Did you realize any benefit in your
5 career?

6 A Beyond what it reflected in the Private Bank. I didn't personally get something
7 individually because -- like, there's no finder's fee or something like that, if that's what you're
8 referring to.

9 Q There's no monetary benefit?

10 A No, no.

11 Q Did you manage the clients' accounts?

12 A No.

13 Q Did Epstein ever ask that you take a role in someone's account?

14 A No.

15 Q Was Mr. Epstein involved in any of the accounts?

16 A No.

17 Q How much revenue did J.P. Morgan generate from Mr. Epstein's new client referrals?

18 A I wasn't aware then, but I have read subsequent it would be, you know, well over \$100
19 million.

20 Q And that would have made him an incredibly valuable client, correct?

21 A Yeah. I think the introduction of the people that -- of the level of people that he
22 brought to us was very valuable, yes.

23 Q Do you think his value caused J.P. Morgan to turn their heads at the suspicious things
24 that Mr. Epstein was engaged in, even following 2008?

25 A Again, I was not part of the bank that reviewed his account. I was not part of the rapid

1 response teams, I was not part of compliance, so I'd be speculating as to what their motivations
2 were.

3 Q I am asking you to speculate.

4 Do you believe that J.P. Morgan kept Mr. Epstein's on as a high-risk client because he
5 generated so much revenue for the bank?

6 A No, I don't. I think J.P. Morgan felt that the principal activity of the Private Bank is to
7 invest money, and I think Morgan took the decision to no longer deal with Epstein in the
8 management of his assets. That was a major move by the bank against him in the bank's mind.

9 Q Who had visibility into Mr. Epstein's accounts?

10 A I think the bankers that managed his accounts; I think compliance did; I think legal did; I
11 think risk did; and people in operations did.

12 Q Did you?

13 A No.

14 Q Did you review any of his transactions?

15 A No.

16 Q Were his transactions ever discussed with you?

17 A At some point I learned that he was making cash withdrawals, and I asked him about
18 that because cash withdrawals were a red light for the bank and a red light for regulators.

19 Q When did you become aware of that?

20 A I'm not exactly sure what year it was, but I want to say 2010, 2011.

21 Q Who would have been responsible for reviewing these transactions?

22 A Again, members of the rapid response team, heads of compliance, people involved in
23 legal, and I think ultimately my recollection is it did go all the way up to the general counsel of the
24 bank.

25 Q Who was that?

1 A At that -- beginning of 2009, 2010, I think it was Steve Cutler.

2 Q Did you ever ask Mr. Epstein about the cash withdrawals?

3 A I know someone -- either I did or Mary did. And he said that they -- he told her or he
4 told me that they were to -- or he told his banker that they were for fuel for his airplane.

5 Q Did you ask why he would need cash for airplane fuel?

6 A I don't think I did. I think the question -- I think the question was discussed, and I think
7 the view was, particularly if you're flying overseas or whatnot, that oftentimes you would pay cash
8 for fuel as opposed to another source.

9 Q What steps were taken to investigate that defense?

10 A I don't know. Again, I was not part of the team that was -- that was looking into that.

11 Q You mentioned this made it up to the general counsel, Stephen Cutler. Did you discuss
12 the matter with Stephen Cutler?

13 A At one point in time, yes. I think as Epstein's problems built, he hired some very
14 recognized lawyers, and I recall that I suggested Steve meet with them.

15 Q Why did you suggest that?

16 A So the bank would make an informed decision as to whether to keep Epstein or not as a
17 client.

18 Q In October 2011, Stephen Cutler complained to you and others that Epstein was not an
19 honorable person in any way, and should not be a client. How did you respond?

20 A Again, I let the bank do what the bank felt was proper.

21 Q Did you say anything at that moment in response to him, though?

22 A I think that's when he had people like Ken Starr represent him and just suggested that
23 Steve meet with Ken Starr. But it was Steve Cutler's decision to close him as a client or not.

24 Q There's --

25 A If Steve Cutler wanted to do it, he could have done it.

1 Q There is reporting that you asked Mr. Cutler to sit down with Mr. Epstein and hear him
2 out. Is that correct?

3 A Yes. Or hear his lawyers out. I forget what it was. It was either meet with
4 Epstein -- I think I did meet with Epstein, and I don't know whether Steve met with him or was with
5 his lawyers.

6 Q Why did you advocate for Mr. Cutler to take his time to meet with Mr. Epstein?

7 A Steve was running legal and compliance in the bank, and these were serious allegations,
8 and the bank was going to exit Epstein more than it already had, seemed like Steve -- seemed like the
9 thing to do was have Steve meet with Epstein himself.

10 Q Did you not feel as though Mr. Epstein, as a registered sex offender and someone who
11 pleaded guilty to soliciting prostitution from minors, was a great risk to the bank and should be
12 removed as a client?

13 A Well, again, the bank cut off the principal activities that it had with Epstein. The
14 question is whether you would close his checking account or not. And my --

15 Q Did anyone else at the bank take steps to defend Mr. Epstein?

16 A I don't think I took steps to defend Mr. Epstein, but I think his banking team defended
17 him.

18 And I think what's telling is when Epstein moved his accounts ultimately out of Morgan, he
19 followed his banking team to Deutsche Bank.

20 Q Was Mr. Cutler going to remove Mr. Epstein as a client before you asked him to sit down
21 with Mr. Epstein?

22 A I don't know.

23 Q Reporting indicates that Justin Nelson wrote a memo trumpeting Epstein's large volume
24 of business with J.P. Morgan and noting that, despite his status as a sex offender, he was still clearly
25 well-respected and trusted by some of the richest people in the world.

1 Did you ever see this memo?

2 A I know Justin Nelson. I don't know if I saw that specific memo.

3 Q Did you ever speak with Mr. Nelson about Mr. Epstein's status as a client?

4 A I recommended that Justin Nelson be the banker for Jeffrey Epstein at one point, but I
5 think that was it.

6 Q Was Justin Nelson also your banker?

7 A He became the banker to my wife's family, not to me.

8 Q Are you aware of whether Mr. Epstein asked Mr. Nelson to write this memo?

9 A No.

10 Mr. Emmer. We've had another Member join. Can she please announce herself for the
11 record.

12 Mrs. Luna. Congresswoman Luna.

13 Mr. Emmer. Mrs. Luna, we understand you have some questions?

14 Mrs. Luna. I do. Thank you.

15 Thank you for being here today. I wanted to see, have you ever made a settlement payment
16 to [REDACTED]?

17 Mr. Staley. No.

18 Mrs. Luna. Okay. At your position at J.P. Morgan, you had referenced U.S. intelligence
19 agencies.

20 Can you elaborate further on your interactions with various agencies, and if so, which
21 agencies were those?

22 Mr. Staley. Can you say that again? Sorry.

23 Mrs. Luna. You had made a reference to having contact with U.S. intelligence agencies for
24 your work at J.P. Morgan.

25 Mr. Staley. Yes.

1 Mrs. Luna. Can you specify as to the agencies, as well as what that nature of work may have
2 been?

3 Mr. Staley. I believe it was the State Department and the CIA.

4 Mrs. Luna. Okay. Can you elaborate further on what they were having you do?

5 Mr. Staley. Yes. This was after 9/11, and the Bin Laden family had its international banking
6 accounts with J.P. Morgan --

7 Mrs. Luna. Uh-huh.

8 Mr. Staley. -- and the State Department and Morgan and I agreed that I should fly to Saudi
9 Arabia to meet with the Bin Laden family and to tell them that the State Department and Morgan
10 recognized that Osama bin Laden was rogue and had been expelled by the family, then the family's
11 business with Morgan would be preserved.

12 Mrs. Luna. Where does the CIA fit into those conversations?

13 Mr. Staley. Hmm?

14 Mrs. Luna. Where does the CIA fit into those conversations?

15 Mr. Staley. My recollection is the CIA came to meet me in my office.

16 Mrs. Luna. With the State Department?

17 Mr. Staley. I'm not sure whether it was the same time or together.

18 Mrs. Luna. Do you remember who at the State Department or who at the CIA came to meet
19 you?

20 Mr. Staley. No.

21 Mrs. Luna. Okay. Following up on that, were you aware that Jeffrey Epstein had an alias?

22 Mr. Staley. Had a what?

23 Mrs. Luna. An alias.

24 Mr. Staley. No, I was not.

25 Mrs. Luna. Okay. He had an alias that was listed with a Saudi Arabian address.

1 Following that interaction that you had with the Bin Laden family, did Jeffrey Epstein ask to
2 meet with you again?

3 Mr. Staley. With respect to the Bin Laden family?

4 Mrs. Luna. Or closely thereafter.

5 Mr. Staley. I don't know about the timing, but I don't think he met with me with respect to
6 the Bin Laden family.

7 Mrs. Luna. Did he ever ask you about your travels to that area or interactions with the
8 family?

9 Mr. Staley. He was close to a member -- a member of the royal family in Dubai.

10 Mrs. Luna. Who was?

11 Mr. Staley. He ran Dubai ports.

12 Mrs. Luna. Who was close to a member of --

13 Mr. Staley. Epstein.

14 Mrs. Luna. Okay.

15 Mr. Staley. And I met with the sheik who ran the ports for Dubai. That was the only
16 really -- and then he had connections in Israel, and I met senior officials in Israel that Epstein knew.

17 Mrs. Luna. Who did you meet?

18 Mr. Staley. I met Ehud Barak, and I met the Prime Minister Netanyahu.

19 Mrs. Luna. Those are my questions.

20 BY MS. TOLAN:

21 Q And then I just have a quick follow-up from something we were discussing earlier. You
22 mentioned you were not part of the rapid response teams or any of the teams overseeing
23 Mr. Epstein's accounts.

24 We were talking about you being informed of him making the suspicious cash withdrawals.
25 Why were you informed of that?

1 A Again, I think it was very suspicious, and generally the bank would report cash
2 withdrawals like that to the Federal Government. And, you know, it's just something that generally
3 the bank would not allow.

4 Q But you said you were informed about it and then had a discussion with Mr. Epstein. Is
5 that correct?

6 A As I said, I said I think I or Mary Erdoes said that the bank raised this issue about cash
7 and there was a problem.

8 Q So who would have informed you about the withdrawals?

9 A I don't recall who exactly was informing.

10 BY MS. BRIGNAC:

11 Q When did you begin working at Barclays?

12 A In December 2015.

13 Q What was your position?

14 A CEO.

15 Q What is Barclays?

16 A It is a major international bank headquartered in London.

17 Q Did you ever ask Mr. Epstein to assist you in getting the position at Barclays?

18 A Never.

19 Q It's been reported that Mr. Epstein enlisted a London power broker to plant seeds about
20 you with senior bank officials back in 2012.

21 But you interviewed for the job in 2012, and it ultimately went to another Barclays executive.
22 Did you interview for the position in 2012?

23 A Yes.

24 Q And it did go to someone else?

25 A Yes.

1 Q So the rest of the reporting is correct. Did Mr. Epstein enlist a London power broker to
2 plant seeds about you?

3 A I don't know, and I would not have wanted someone to lobby on my behalf.

4 Q You never asked him to speak with --

5 A Never.

6 Q -- anyone?

7 A No.

8 Q In 2015, did Barclays ask that you change anything about your relationship with
9 Mr. Epstein?

10 A No. I took the decision when I became CEO of Barclays that I would cut all contact
11 with Jeffrey Epstein.

12 Q Did you, in fact, cut all contact with Mr. Epstein in 2015.

13 A I had no contact post-2015 with Jeffrey Epstein, direct contact.

14 Ms. Brignac. I'll now enter majority exhibit 8 into the record. This document is Bates
15 stamped with EFTA01055036. It is an email exchange between your daughter [REDACTED] and
16 Mr. Epstein from February 6th, 2017.

17 [Staley Majority Exhibit No. 8.

18 was marked for identification.]

19 Ms. Brignac. We'll go off the record.

20 We're back on the record.

21 BY MS. BRIGNAC:

22 Q Do you recognize these emails, Mr. Staley?

23 A Yes.

24 Q Can you describe what's happening in the thread?

25 A Again, I think it is Jeffrey Epstein, unfortunately, trying to contact me through my

1 daughter.

2 Q Were you aware that Mr. Epstein was contacting your daughter in 2017?

3 A My understanding is it happened twice. I was not aware -- I don't believe there was
4 contact before this exchange.

5 Q Why would Mr. Epstein reach out to [REDACTED] regarding a former J.P. Morgan employee,
6 Veronique Weill?

7 A Again, many years before he was helpful in her pursuit of physics. So they knew each
8 other. And it seems like he approached her with respect to Veronique Weill.

9 Q Did your daughter come to you and ask you this question?

10 A That's what this email says.

11 Q Did you know it was coming from Mr. Epstein?

12 A I believe so.

13 Q So, Mr. Staley, we can agree your communications through your daughter to Mr. Epstein
14 were in violation of the agreement you made to Barclays to cut off communication with Mr. Epstein
15 after 2015, correct?

16 A There was not an agreement. What I told Barclays was that I had not had physical
17 contact with Epstein for a while, which was true, and I cut off contact directly with Epstein upon
18 taking the CEO role at Barclays, which is also true.

19 Q And then you began communicating to Mr. Epstein through your daughter, [REDACTED]

20 A No, I did not start communicating with Epstein through my daughter.

21 Q You testified you were aware that your -- the message from your daughter --

22 A No.

23 Q You testified earlier that you were aware that your daughter's message came from
24 Mr. Epstein, and it reflects in the document that you gave [REDACTED] that information.

25 So you did not cut off contact with Mr. Epstein following 2015, correct?

1 A Your first thing is that I was trying to contact Epstein through my daughter. I was not
2 trying to contact Epstein through my daughter.

1 [1:53 p.m.]

2 Mrs. Luna. I'm back for more questions.

3 Do you know who [REDACTED] is? Have you heard of that name?

4 Mr. Staley. Now I have.

5 Mrs. Luna. Okay.

6 She read the email, "The Snow White was [fucked] twice as soon as she put [on] her
7 costume."

8 Would you say that that would be a predatory statement to make about this image?

9 Mr. Staley. What -- what's your question?

10 Mrs. Luna. Would you say that that statement is a predatory statement to make about this
11 image?

12 Mr. Staley. I don't think it's a predatory statement made about --

13 Mrs. Luna. You don't think that's predatory?

14 Mr. Staley. No, I think -- I think someone assaulting a women is predatory, yes.

15 Mrs. Luna. The question was, do you think that that's a predatory statement to make about
16 this image?

17 Mr. Staley. I don't know who that person is.

18 Mrs. Luna. I'm not asking if you know who that person is. I'm asking if you think that that
19 statement is a predatory statement to make about this image.

20 Mr. Staley. If that's what the -- if that's the image that the person is referring to --

21 Mrs. Luna. Referring to, yes.

22 Mr. Staley. -- then, yes, that would be a predatory statement.

23 Mrs. Luna. Okay.

24 Going back to this email correspondence, it appears that Jeffrey Epstein is asking you, which
25 character would you like next? Do you know what he's referencing?

1 Mr. Staley. I don't.

2 Mrs. Luna. Okay.

3 It says that you're responding to him, "Beauty and the Beast." What can you refer in
4 "Beauty and the Beast"? Are you talking about Belle?

5 Mr. Staley. I'm just mentioning "Beauty and the Beast."

6 Mrs. Luna. Sir, I wouldn't laugh at this at all. It's very --

7 Mr. Staley. I'm not.

8 Mrs. Luna. -- disturbing to read --

9 Mr. Staley. I'm not.

10 Mrs. Luna. -- these emails.

11 So I just -- the reason I'm asking you is because, to me, reading this, it looks like there's
12 trafficking happening. And what I would also say is, this girl looks she's about maybe 13, 14 years
13 old. So, if this was written about someone like your child, I don't think that you would be laughing
14 right now.

15 And so the point is that we have you here. Can you give us information and/or names for
16 people that you may know who have harmed these kids?

17 Mr. Staley. No. I do not know anyone --

18 Mr. Sullivan. Congressperson, I have an objection --

19 Mrs. Luna. It's "Congresswoman."

20 Mr. Sullivan. Congresswoman. Thank you. But to say, from the picture, to guess the age
21 as 13 years old strikes me as --

22 Mrs. Luna. I've seen some of the unredacted photos of these --

23 Mr. Sullivan. Well --

24 Mrs. Luna. -- and they are children.

25 Mr. Sullivan. -- that's your view, but I'd like to see them.

1 Mrs. Luna. Well, you can -- I'm sure you'll get the opportunity if this becomes criminal.

2 Mr. Sullivan. Thank you.

3 Ms. Brignac. We have some pressing followups. We'll go off the record, and we'll come
4 back on later to ask those followups.

5 [Recess.]

6 [REDACTED]. We're back on the record.

7 BY [REDACTED]:

8 Q Mr. Staley, I'd like to ask you a few clarifying questions based on what you said during
9 the minority's first round.

10 You referred to Mr. Epstein's assistants as "mature" and also as in their late twenties or early
11 thirties. We have a different understanding of his assistants, but given the distinction that you are
12 drawing, I would like to repeat some of the questions I asked you but in the context of his assistants.

13 When you visited Mr. Epstein's New York home, were there ever assistants in the room when
14 you met with Mr. Epstein?

15 A Only that they would occasionally come in and offer coffee or something like that.
16 They weren't sitting in the room during the meetings, no.

17 Q Were there ever assistants sitting on Mr. Epstein's lap when you talked to him?

18 A No.

19 Q We previously talked about your interactions, sexual or otherwise, with women
20 connected to Mr. Epstein. To be clear, when I say "women connected to Mr. Epstein," I am
21 including his assistants.

22 Did you ever introduce any of the women connected to Mr. Epstein to anyone in your family?

23 A No.

24 Q So you never introduced any of the women connected to Mr. Epstein to your
25 daughters?

1 A No.

2 Q Have you ever had a conversation with Leon Black about your relationship with
3 Mr. Epstein?

4 A I think we -- we both knew that we knew Epstein. I don't know if I had a specific
5 conversation with him.

6 Q Did you have a conversation with Mr. Black about Mr. Epstein's crimes?

7 A I think we were both aware of Mr. Epstein's crimes.

8 Q Sure. And did you talk about them?

9 A We may have, but I don't recall a specific conversation.

10 Q When would that have been?

11 A I don't know.

12 Q Do you have a sense for whether that would have been post-arrest, post-incarceration,
13 or later?

14 A I think it would've been post-indictment and probably post-arrest.

15 Q And do you have any memory of specifically what you would have talked about?

16 A No.

17 Q Did you ever have a conversation with Mr. Black about any woman connected to
18 Mr. Epstein?

19 A No.

20 Q Did you ever meet with Mr. Black in Central Park to discuss any of these issues -- your
21 relationship with Mr. Epstein, Mr. Epstein's crimes, or any woman connected to Mr. Epstein?

22 A Not that I remember, no.

23 Q Thank you.

24 BY [REDACTED]:

25 Q Mr. Staley, you've previously made contradictory statements about your friendship with

1 Mr. Epstein. For example, you have said, quote, your relationship with Mr. Epstein was "never a
2 personal one, nor one that could be described as close." But you have also said that you and
3 Mr. Epstein had a, quote, "fairly close relationship." At one point, you said Mr. Epstein was, quote,
4 "a friend."

5 I would like to clear up some of this confusion and get a better sense of your friendship with
6 Mr. Epstein.

7 I'll begin by introducing what will be marked as minority exhibit K.

8 [Staley Minority Exhibit K.

9 was marked for identification.]

10 BY [REDACTED]:

11 Q This is six separate email exchanges between you and Mr. Epstein from the first few
12 weeks of his sentence at the Palm Beach stockade. It's from July 10th, 2008, until September 11th,
13 2008.

14 The first email, which begins on the bottom of the first page and goes into the top of the
15 second page, is from you to Mr. Epstein, dated July 10, 2008, which is just 10 days into his sentence.

16 In the email, you write, quote, "I miss you. The world is in a tough place. Hang in there."

17 It appears at this point that Mr. Epstein was a friend. Is that correct?

18 A Again, my relationship with Epstein was based on a close professional relationship
19 anchored in business, but I would use language like "friend" and "close friend."

20 Q So you were friends.

21 A I would use language that way, yes, but it was grounded in the business relationship that
22 we had.

23 Q Could you elaborate on what you mean by you "would use language that way"?

24 A I often talked to people that I worked with and called them friends and close friends.

25 Q So the business -- the relationship was grounded in business, but you transitioned into

1 being friends as well.

2 A I use the word "friend" to describe the relationship, but, for instance, you know, he
3 never came to my house, he never came to social occasions with my family. I would call that a
4 personal friend. [Inaudible] were tied to business.

5 Q So a business friend.

6 A Yes.

7 Q Understood.

8 And this is one of the first emails we have between you and Mr. Epstein. Your message
9 suggests that you were in contact often, if you missed him after just 10 days of him being in the Palm
10 Beach stockade.

11 How frequently were you in touch with Mr. Epstein before he was incarcerated?

12 A Again, I think we would talk, you know, once or twice a week. I'd visit him, you know,
13 once every other week, that sort of frequency.

14 Q Okay.

15 I would like to move to the fourth page of this exhibit. This is an email from you to
16 Mr. Epstein dated July 16th, 2008, just 1 week later.

17 In this email, you say, quote --

18 Mr. Sullivan. Just give us 1 minute to locate it. The fourth page. Is it marked "4".

19 [REDACTED]: Yes, towards the bottom of that page.

20 Mr. Sullivan. Okay. Got it.

21 BY [REDACTED]:

22 Q You say, quote, "I hope you're managing. I miss our calls. It's boring without you
23 around."

24 I will now move to the fifth page. It's an email from you to Mr. Epstein dated July 31st,
25 2008. This is the third email that you sent to Mr. Epstein in just 3 weeks. In this email, you say,

1 quote, "I hope you are hangin there. Just think of the island and my boat anchored in front. I do."

2 On page 6, this is another email from you to Mr. Epstein, on August 3rd, 2008. You say,
3 quote, "Just thinking about you."

4 On the next page, page 7, you email Mr. Epstein on August 4th, 2008, and say, quote, "Hang
5 in there. Keep thinking of the Island."

6 Finally, on page 8, you write to Mr. Epstein on September 11, 2008, saying, quote, "A very
7 tough day today. Thinking of you there. With what I see, it is so unfair. Hang in there, please."

8 Based on these emails, I think it's fair to say that you and Mr. Epstein were very close.
9 Would you agree?

10 A I would repeat what I've said before. I think we had a close professional relationship.
11 I use language like this. Like many people you deal with in business -- at this point, I was building a
12 boat. He encouraged me to build the boat. But that's what a lot of this refers to.

13 Q Was it common for you to email other business friends saying things like "I miss you"
14 and "Just thinking about the island and my boat anchored in front"?

15 A Well, there was not that many friends had islands that I anchored my boat in front of it.

16 Q So the first part of the question. Was it common for you to email other business
17 friends saying "I miss you"?

18 A I think it would be common that I would mention to people that I worked with that
19 I -- you know, that I missed them, but --

20 Q So the people that you worked at J.P. Morgan with, not clients of the bank.

21 A I'm sure there were some clients that I did this as well, but I don't know. I couldn't
22 name them for you.

23 Q Okay.

24 I will now introduce what will be marked as minority exhibit L.

25 [Staley Minority Exhibit L.

1 was marked for identification.]

2 BY [REDACTED]:

3 Q This is an email from you to Mr. Epstein on December 30th, 2010. The Bates number is
4 EFTA02533765.

5 In this email, you write, quote, "Happy new year. It [is] nice to have u free. Much to come.
6 Please know that I am [a] friend forever. You are very special," to which Mr. Epstein replied, quote,
7 "Ditto."

8 What did you mean by "much to come"?

9 A I don't recall.

10 Q You don't recall what you meant?

11 A No.

12 Q Why did you tell Mr. Epstein that you were a friend forever?

13 A I think I was showing sympathy to him.

14 Q Sympathy for what?

15 A I believe this is when he was getting out of prison.

16 Q So you felt sympathy for him at the time, even with the charges that he was serving time
17 for?

18 A Yeah. I thought he had served his time, he had -- he had -- he had -- he had paid his
19 price, and never -- I never imagined that he would continue to act criminally.

20 Q And what made Mr. Epstein, quote, "very special" to you?

21 A Again, he had given me very valuable business advice. He was instrumental in one of
22 the biggest transactions of my career, the acquisition of Highbridge Capital. He gave me counsel in
23 my discussions with the bank about my career. He gave me counsel -- so those are the things.

24 Q So he was just very special because of what he provided for you in your career?

25 A Oh, I think that's what drove it. I mean, again, he was instrumental in the most

1 important transaction of my career up to that point. He gave me a lot of business. He connected
2 me with -- you read the list -- an incredible group of people that helped my career. So, yeah, he was
3 very helpful to me.

4 Q But this was 6 years after the Highbridge Capital deal. So there was nothing else that
5 had happened in between that you felt made him very special to you?

6 A No. He introduced me to names that we've talked about. He introduced me to that.
7 He would facilitate when I traveled overseas to meet with business and country leaders. He did a
8 lot of things like that.

9 Q Okay.

10 BY [REDACTED]:

11 Q One quick followup for you, Mr. Staley.

12 When you said these things to Mr. Epstein about how you missed him and you were thinking
13 about him and he was special to you, that you were a friend forever, were those disingenuous?

14 Because it seems like what you're saying now is that you didn't mean them, and if that's the
15 case --

16 A I mean, you know --

17 Q -- why?

18 A -- you know, a point of fact is, when I became CEO of Barclays, I completely cut off all
19 relationship with him and stopped being his friend.

20 Q So he was a friend before you became the CEO of Barclays?

21 A Well, again, I was responding to the question, was I being disingenuous? And I was
22 responding to the "disingenuous" part by saying, no, actually, I cut him off as a -- as a friend.

23 Q But that doesn't answer my question. When you said these things to him, did you
24 mean them at the time?

25 A Again, I used effusive language. The relationship was based on business, as these

1 emails attest to. But I used the word "friendship" with a lot of people.

2 BY [REDACTED]:

3 Q Mr. Staley, in a question my colleague asked you -- what did you mean by, quote, "much
4 to come"? -- correct me if I'm wrong, but you testified that you were expressing sympathy. Is that
5 right?

6 A I don't know what I was referring to when I said "much to come." That could have
7 been much to come in my career, much to come in our discussion about business and the world. I
8 don't know.

9 Q But you told us that this was around the time that Mr. Epstein was being released from
10 jail. Is that right?

11 A Can you remind -- can you show me the --

12 Q Sure. This was exhibit L, Bates number 3765, bottom right.

13 A And ask your question again, sir?

14 Q What you testified to earlier was, around December 30th, 2010, when you wrote to
15 Mr. Epstein, "Much to come," you told us that you were expressing sympathy for him because he was
16 being released from incarceration. Is that right?

17 A My belief is, he was released from incarceration more than a year before this email.

18 Q Great. So that would've been the prior exhibit. Why were you expressing sympathy
19 to Mr. Epstein when he was being released from jail?

20 A Where's the sympathy?

21 Q Sir, I'm just repeating the words that you told us.

22 A Oh, okay.

23 Yeah, you know, this is a year after incarceration. I'm just saying that, you know, we
24 maintained a relationship, and, again, I -- and I'm just saying the relationship will continue.
25 Although, a few years later I terminated the relationship.

1 Q You've testified to that multiple times. I think what we are asking about --

2 A You ask the same question multiple times, so I'm just giving you the same answer.

3 Q Understood. And I think we have been very clear that we're asking about your
4 mindset at the time that you wrote this, and you keep jumping to you've cut off relationship in the
5 future. What we're asking about is your mindset at this time.

6 So, sir, again, you told us that you were expressing sympathy to Mr. Epstein because he had
7 just been released from incarceration. Why were you sympathetic that Mr. Epstein was
8 incarcerated?

9 A I think, you know, he obviously pled guilty, he deserved his incarceration, but that
10 doesn't mean I can't show sympathy for -- for what he went through.

11 Q What did he go through?

12 A But he deserved it. He went to jail.

13 Q To be clear, your testimony is that you felt sympathy that he went to jail.

14 A No, I just felt that -- no, I mean, he rightfully went to jail. And, you know, I'm just
15 expressing sympathy for someone who went through that, even though he deserved it.

16 Q Thank you.

17 BY [REDACTED]:

18 Q Could I just follow up really quickly?

19 You said "he deserved it," but then in a previous email we had looked at, you also said, "From
20 what I see, it is so unfair."

21 Do you know what you were referring to there?

22 A Uh --

23 Mr. Sullivan. Look at the email, please.

24 BY [REDACTED]:

25 Q Page 8 of the first exhibit I introduced, the packet, the last page.

1 A So this is not 2011; we're talking about 2008 now?

2 Q Yes.

3 A So 3 years before?

4 Q Two years before, I believe. We were talking 2010.

5 A Okay, sorry. Two years before.

6 This is when I guess he was going to jail, right?

7 Q He had already been there for about 3 months, I believe, at the time.

8 A Thanks.

9 Yeah, I don't know what happened on that day, why that day was particularly tough.

10 Q Do you believe you were saying it's unfair that he was serving time?

11 A I don't recall if that was referring to that.

12 BY MR. [REDACTED]

13 Q Mr. Staley, do you believe Mr. Epstein's guilty plea is supported by the merits, by the
14 facts?

15 A He pleaded guilty.

16 Q That's not my question, sir. Do you believe it's supported by the facts?

17 A I have no reason to say it wouldn't be.

18 Q Okay.

19 BY [REDACTED]:

20 Q Mr. Staley, I'd like to ask you some questions about your time at J.P. Morgan.

21 Before I do, a quick point of clarification. You gestured at me when you said that I read a list
22 of names of referrals. That was not me. That was my colleague on the majority, who is also a
23 woman with brown hair.

24 A Sorry.

25 Q You were head of J.P. Morgan's Private Bank from 1999 to 2001, correct?

1 A Correct.

2 Q And then you were promoted to CEO of J.P. Morgan's asset management division in
3 2001, correct?

4 A Correct.

5 Q And you ran J.P. Morgan's asset management division until 2009, at which point you
6 were appointed as CEO of the investment banking division, correct?

7 A Correct.

8 Q And you left J.P. Morgan in early 2013, correct?

9 A Correct.

10 Q Is it accurate to say, during the time that you were at the company, that, in addition to
11 banking services, J.P. Morgan's Private Bank offered clients customized lending services, investment
12 advice, portfolio management, and wealth planning?

13 A Yes.

14 Q Are there other services that the Private Bank offered that I have left out?

15 A Can you read the list again?

16 Q Other than banking services, customized lending services, investment advice, portfolio
17 management, and wealth planning.

18 A That, and I would add things like custody. Was brokerage in there?

19 Q Brokerage was not in there.

20 A So I would include brokerage. So those are two that I would add.

21 Q Thank you.

22 Is it also accurate to say that J.P. Morgan's Private Bank would have worked in conjunction
23 with the asset management division in offering some of those services?

24 A Yes.

25 Q When you were head of the Private Bank, who did you report to?

1 A I think it changed over time, but ultimately I reported to Jamie Dimon.

2 Q So, when you were the head of the Private Bank, you reported to the CEO directly?

3 There wasn't someone in between you?

4 A Yeah, I think it was initially Sandy Warner, then I believe it was Bill Harrison, and then I
5 believe it was Jamie Dimon.

6 Q And when you became CEO of asset management, did the head of the Private Bank then
7 report to you?

8 A Yes.

9 Q And when you were CEO of asset management, you continued to report to the CEO?

10 A Yes.

11 Q And when you were CEO of investment banking, the same was true? You reported
12 directly to the CEO?

13 A Yes.

14 Q I'd like to ask you a few high-level questions about J.P. Morgan's due diligence reports.
15 First, what is a due diligence report?

16 A It's a report that the bank has studied a certain topic and it has done its due diligence,
17 whether it's know-your-client, whether it's AML, anti-money-laundering. There are activities like
18 that that a due diligence report might be part of.

19 Q What action would trigger the creation of a due diligence report?

20 A I don't know specifically.

21 Q Do you know what action would trigger an --

22 A I mean, opening --

23 Q -- update?

24 A -- opening an account, extending a loan, I think those activities would trigger a due
25 diligence report.

1 Q Okay. So opening an account triggers a due diligence report.

2 In the context of accounts -- excuse me. In the context of an account, what would trigger an
3 update to a due diligence report?

4 A Change in assets. Change in direction of the account. Any concern that the bank
5 might have about the account or the holder of the account. That sort of thing.

6 Q Who would typically create or update a due diligence report?

7 A Again, I would think someone in risk, someone in compliance, someone in legal, that
8 type of thing.

9 Q Would due diligence reports be shared with individuals in the Private Bank or the asset
10 management division?

11 A Sure.

12 Q Would anyone at J.P. Morgan need to sign off on a due diligence report?

13 A I imagine someone in risk or credit or compliance, yeah, would need to sign off on a due
14 diligence report.

15 Q Could it also be someone in the Private Bank or the asset management division?

16 A Well, there were people in asset management and the Private Bank that were part of
17 compliance, part of legal, part of risk, so, in that sense, yes.

18 Q Got it. Okay.

19 I'd like to get a better sense of Mr. Epstein's relationship with J.P. Morgan.

20 Mr. Epstein became a J.P. Morgan client in 1998, correct?

21 A That's my understanding.

22 Q And he was a J.P. Morgan client until 2013, correct?

23 A That's my understanding, yes.

24 Q We understand that Mr. Epstein had personal accounts and business accounts at J.P.
25 Morgan. Is that correct?

1 A I believe so.

2 Q We also understand that Mr. Epstein set up J.P. Morgan accounts for his staff. Is that
3 correct?

4 A I was not aware of that, but very possible. I was not involved in his accounts, so --

5 Q We also understand that Mr. Epstein set up J.P. Morgan accounts for women that he
6 was connected to. Are you aware of that?

7 A No.

8 Q Who at J.P. Morgan was responsible for servicing Mr. Epstein's accounts?

9 A He had a banking team that I think was led by a gentleman by the name of Paul Morris.

10 Q Do you remember who else was on that team?

11 A No.

12 Q What about Justin Nelson, who you referred to earlier?

13 A Yeah, I think he was earlier; then I think it was Paul Morris. That's my recollection.

14 Q Anyone else?

15 A That I recall? No.

16 Q What would Paul Barrett's role have been in servicing Mr. Epstein's accounts?

17 A I don't know who Paul Barrett is.

18 Mr. Sullivan. Do you mean Morris? Are you thinking Morris.

19 BY [REDACTED]:

20 Q That's my mistake. Thank you.

21 A That's okay.

22 Q What was Paul Morris's role in servicing Mr. Epstein's accounts?

23 A I think he was a lead banker for Jeffrey Epstein's accounts.

24 Q And you said Justin Nelson came before Paul Morris? Is that right?

25 A Yeah, again, I am -- I'm not sure.

1 Q Was he also a lead banker in servicing Mr. Epstein's accounts?

2 A I believe at one point he was, yes.

3 Q And you said you don't know who Paul Barrett is. Is --

4 A No.

5 Q -- that correct?

6 A That's correct.

7 Q What about Marcus Sheridan?

8 A Marc Sheridan? I recognize the name.

9 Q But you don't know what his role would've been?

10 A It was a long time ago.

11 Q What about Mary Casey?

12 A I think Mary Casey ran one of the banking groups of which Paul Morris was one of the
13 bankers. We were divided by geography, so I wonder -- I think Mary Casey ran one of the
14 geographic groups that included the Epstein account.

15 Q What about Lisa Waters?

16 A My recollection is that Lisa Waters was in compliance, but I'm not sure.

17 Q When did you first learn that J.P. Morgan had concerns with Mr. Epstein's accounts?

18 A I think there were concerns in 2008 -- 2006, 2008.

19 Q 2006 or 2008 is when you first learned that J.P. Morgan had concerns with Mr. Epstein's
20 accounts?

21 A Well, there was a rapid response meeting, and I -- and there was -- you can line it up
22 with that date. And I think it was 2006.

23 Q Do you remember what those concerns were?

24 A He was -- he was indicted.

25 Q In 2003, Vanity Fair published an article on Mr. Epstein titled, "The Talented

1 Mr. Epstein." It included the following lines:

2 Quote, "One young woman recalls being summoned by Ghislaine Maxwell to a concert at
3 Epstein's town house, where the women seemed to outnumber the men by far. 'These were not
4 women you'd see at Upper East Side dinners,' the woman recalls. 'Many seemed foreign and
5 dressed a little bizarrely.' This same guest also attended a cocktail party thrown by Maxwell that
6 Prince Andrew attended, which was filled, she says, with young Russian models. 'Some of the
7 guests were horrified,' the woman says."

8 Do you remember this article being published?

9 A No.

10 Q I would think that a Vanity Fair piece on a client and friend would be memorable, no?

11 A I mean, you're asking whether I remember the article now. I may have recognized the
12 article then.

13 Q Do you know if anyone at J.P. Morgan was aware of this article?

14 A I don't know.

15 Mr. Sullivan. Excuse me. Is this '03, did you say.

16 [REDACTED]. I'm sorry, Mr. Sullivan.

17 Mr. Sullivan. 2003?

18 [REDACTED]. Correct.

19 BY [REDACTED]:

20 Q I would like to introduce as minority exhibit M an email between two J.P. Morgan
21 employees -- Mary Rieth, who's later Mary Casey, and Paul Lahiff -- dated May 21st, 2003. The
22 Bates number is EFTA02810792.

23 [Staley Minority Exhibit M.

24 was marked for identification.]

25 BY [REDACTED]:

1 Q In the email, Ms. Rieth tells Mr. Lahiff that she just got the due diligence report on one
2 of Mr. Epstein's companies and notes that she, quote, "was waiting to pull everything together
3 before sending down the Vanity Fair article."

4 Why do you think these J.P. Morgan employees were tracking the Vanity Fair article in the
5 context of a due diligence report.

6 A Well, I'd like to read the Vanity Fair article. This is 23 years -- no -- this is 24 years ago
7 or 23 years ago.

8 If there was something negative in that article, then, you know, the bank would want to
9 review it and review the account to make sure they were comfortable with -- with the client.

10 Q Did J.P. Morgan suspect Mr. Epstein was engaging in sex trafficking as early as 2003?

11 A I don't know. I would -- I would doubt it, but I don't know.

12 Q You would doubt it?

13 A I'm not going to speculate.

14 Q I would like to introduce as minority exhibit N a due diligence report for a checking
15 account that Mr. Epstein asked J.P. Morgan to set up for an unknown woman in 2004.

16 [Staley Minority Exhibit N.

17 was marked for identification.]

18 BY [REDACTED]

19 Q The due diligence report does not list a date of birth for this woman, and it notes that
20 no government documentation has been provided. The report also states that the Social Security
21 given could not be confirmed as belonging to the woman.

22 The report acknowledges that no one at J.P. Morgan actually met with this woman and that
23 all of the information about her was provided by one of Mr. Epstein's advisors, a man named Eric
24 Ganey.

25 Finally, the report notes that the woman is in the U.S. for modeling work and states, quote,

1 "Jeffrey Epstein knows the model personally. Epstein is a longstanding client of JPMPB."

2 The report also states, quote, "Jeffrey Epstein often provides support to emerging models.
3 In this case, [redacted] has arrived from the Slovak Republic, and Epstein has asked us the favor of
4 opening a checking account for her."

5 Would you agree that there are a number of indicators of sex trafficking here?

6 A I think the bank should not be opening an account without doing proper due diligence.

7 Q What would proper due diligence have looked like here?

8 A Knowing who the client is, KYC; AML, anti-money-laundering; knowing where the client's
9 origination of wealth comes from -- all sorts of issues. But if you have an invalid Social Security
10 number, that would be a red flag, et cetera.

11 Q Would you agree -- would you agree that opening this account -- strike that.

12 Did you ever see this due diligence report?

13 A No.

14 Q Were its contents communicated to you?

15 A No.

16 Q Would you agree that opening this account without the information we discussed was a
17 significant failure on J.P. Morgan's part?

18 A It seems noncompliant, yes.

19 Q That same year, 2004, J.P. Morgan noted \$840,000 in cash transactions in Mr. Epstein's
20 J.P. Morgan account. The next year, 2005, J.P. Morgan identified over \$900,000 in cash transactions
21 from Mr. Epstein's personal J.P. Morgan account.

22 Earlier today, you said that significant cash withdrawals are a red light. You have also
23 previously testified in the class action against J.P. Morgan that significant cash withdrawals are a
24 smoking gun.

25 Would you agree that J.P. Morgan sat on a red light or a smoking gun for 9 years?

1 A Seems like it.

2 Q As you know, Mr. Epstein was arrested on July 23rd, 2006, on a single count of soliciting
3 prostitution from a minor.

4 I would like to introduce as minority exhibit O an email exchange between you and Mary
5 Erdoes on July 26, 2006, 3 days after Mr. Epstein was arrested. The Bates number is EFTA02818597.

6 [Staley Minority Exhibit O.
7 was marked for identification.]

8 BY [REDACTED]:

9 Q In the exchange, Ms. Erdoes, who was head of J.P. Morgan's Private Bank at the time,
10 forwards you an email from another J.P. Morgan employee, Philip Schlakman. In that email, Mr.
11 Schlakman links to an article in the Palm Beach Post and writes, quote, "It gets worse."

12 In her email to you, Ms. Erdoes comments, quote, "So painful to read," to which you reply,
13 quote, "I went and saw him last night. I've never seen him so shaken. He also adamantly denies
14 the ages."

15 First, do you remember if you read that article in the Palm Beach Post?

16 A I don't get the Palm Beach Post, but I imagine at some point I read the article.

17 Q I'll share two statements from it with you.

18 Quote, "A Palm Beach Community College student said she gave Epstein a massage in the
19 nude, then brought him six girls, ages 14 to 16, for massage and sex-tinged sessions at his home."

20 And, quote, "Epstein said he'd pay her to bring him more girls -- the younger, the better."

21 Do you remember learning about these allegations?

22 A I don't remember that quote, which is horrendous, that -- what's implied. So -- but I
23 knew that he had been -- you know, the article suggested that he was involved with inappropriate
24 young women, and it was a terrible, terrible accusation.

25 Q What did you understand Mr. Schlakman to mean by, quote, "It gets worse"?

1 A Just that the article is commenting on his -- his activities that were terrible.

2 Q Were there statements in the article that were new information to J.P. Morgan?

3 A Again, I didn't read the article, and so was not aware of what was new or not new to
4 J.P. Morgan. But this implies that, yeah, because as "it gets worse," the implication is that Phil
5 Schlakman is learning something more.

6 Q The article makes repeated mention of Mr. Epstein's sexual abuse and molestation of
7 girls as young as 14. Could that have been what Mr. Schlakman was referring to?

8 A That just -- it's a horrible, horrible thing, and I imagine that that's what he was referring
9 to.

10 Q You visited Mr. Epstein the night of July 25th, 2006, correct?

11 A Yes.

12 Q Why did you visit him?

13 A Because this article had come out making these horrible accusations, and the bank was
14 trying to decide what to do with his accounts, so I thought that I would hear what he had to say.

15 Q Did someone ask you to do this, or did you do it on your own accord?

16 A I believe I did it on my own accord.

17 Q Where did this visit take place?

18 A In his office, I believe.

19 Q And what did you ask Mr. Epstein?

20 A What's going on?

21 Q And what did he say?

22 A I think he denied the ages, which, you know, looking back, is an admission of guilt.

23 Q What do you mean, "looking back, is an admission of guilt"?

24 A I mean, I said I'd never seen him so shaken, he denied the ages, but I think he was
25 accepting that he was soliciting prostitutes.

1 Q Right. He admitted the conduct but denied the ages.

2 A Right.

3 Q Did you believe Mr. Epstein when he denied the ages?

4 A I think I gave him the benefit of the doubt.

5 Q Did you really think that Mr. Epstein could mistake a 14-year-old for an adult?

6 A Again, I don't think a -- you know, no, he shouldn't have.

7 Q But you did?

8 A No. I'm just reporting what he said.

9 Q Well, I'm asking you if you believed him at the time. You said you shouldn't have, and
10 then I said, but you did, correct? You did believe him at the time?

11 A That he was unaware of the ages? I think I gave him the benefit of the doubt.

12 Q Is it fair to say that you were taking these allegations seriously?

13 A Yes.

14 Q I'd like to introduce as minority exhibit P an email exchange between you and Mary
15 Erdoes on August 27th, 2007, about a month after Mr. Epstein was arrested. The Bates number is
16 EFTA02811410.

17 [Staley Minority Exhibit P.

18 was marked for identification.]

19 BY [REDACTED]:

20 Q In the email, you write, quote, "Last night went to the Huggy Bear concert. The age
21 difference between husbands and wives would have fit in well with Jeffrey. What a joke."

22 What did you mean when you said, quote, "The age difference between husbands and wives
23 would have fit in well with Jeffrey"?

24 A I think I was, you know, referring that, at that party in the Hamptons, the age difference
25 between the men and the women was -- was significant.

1 Q And when you say "party in the Hamptons," you're referring to the Huggy Bear concert?

2 A It looks like that, yes.

3 Q What did you mean when you said, quote, "What a joke"?

4 A I find it awkward to see such an age difference between men and women.

5 Q But that's not what you say. You don't say the age difference was significant and it was
6 uncomfortable or awkward. You say, "What a joke."

7 A Yeah, I think that's similar.

8 Q So you're not commenting on Mr. Epstein's conduct?

9 A In this email?

10 Q When you say, "What a joke"?

11 A [Nonverbal response.]

12 Q When Ms. Erdoes responds to you, she says, quote, "What I meant to tell you about last
13 night was they were a few people laughing about Jeffrey." She goes on to talk about someone in
14 particular and then says, quote, "Anyway, lots of comparisons to JE."

15 It would appear that the two of you both thought that this was funny.

16 A No. I don't think, when I'm saying, "What a joke," do I -- am I saying it in the context
17 of, is it funny? I think, again, I think I'm saying it, the irony that I think we correctly believed that
18 the age difference between Jeffrey and what he was doing was wrong but you go to a party like this
19 in the Hamptons and you see similar age differences.

20 Q And so that was the joke?

21 A I think that's the -- that's the irony. Again, I don't think it's joking in a sense of humor.
22 I think it's sad.

23 Q I would like to introduce as minority exhibit Q an internal J.P. Morgan document with
24 the heading, "Rapid Response Team, October 17, 2006, Existing Client -- Jeffrey Epstein." The Bates
25 number is EFTA02812987.

1 [Staley Minority Exhibit Q.
2 was marked for identification.]

3 BY [REDACTED]:

4 Q The document states that Mr. Epstein has banking, asset, and credit accounts with
5 J.P. Morgan with balances totaling approximately \$32 million.

6 It further states that, quote, "cash withdrawals are routinely made in amounts for \$40,000 to
7 \$80,000 several times a month."

8 Finally, under "Derogatory Information Reported by Security Services," it states, quote,
9 "Several newspaper articles were found that details the indictment of Jeffrey Epstein in Florida on
10 felony charges of soliciting underage prostitutes."

11 Had J.P. Morgan connected Mr. Epstein's frequent cash withdrawals with his sexual abuse of
12 minors at this point?

13 A Again, cash withdrawals of this size are very unusual and, as I said before, is a red light.
14 It should've been reported to the Federal authorities, and the Federal authorities should've looked at
15 it as well. And given Epstein's -- given -- well, again, this is 2006. I just think this should've been a
16 red light for the bank.

17 Q But had J.P. Morgan connected those two things? Because this is a, as you can see,
18 fairly short document. It clearly addresses --

19 A I think the bank -- I think the bank was concerned and, as such, decided to move the
20 nature of its relationship with Jeffrey Epstein and cut off the most significant parts of the general -- of
21 a normal private banking client, which is managing assets, and reduce the relationship to simply his
22 checking account.

23 Q Under "Banker Recommendations," the document states, quote, "After internal
24 discussions with Jes Staley, Mary Erdoes, Catherine Keating, John Duffy, and Mary [redacted], it was
25 decided that we will keep Mr. Epstein solely as a banking client and on a 'reactive,' client service

1 basis. We will not proactively solicit new investment business from him."

2 First, you said earlier today that you were not a part of rapid response meetings.

3 A That's correct.

4 Q But this is a memorandum entitled "Rapid Response Team" that explicitly refers to
5 internal discussions with Jes Staley.

6 A But I was not a member of the Rapid Response Team.

7 Q So what were these internal discussions?

8 A No, I think they -- it looks like they talked with myself, Mary, Catherine, John Duffy, and I
9 imagine this is Mary Casey, came back, had a meeting of the Rapid Response Team as a group, and
10 made the decision to pull back the bank's activities with Mr. Epstein.

11 Q So that was not your decision, but it was based on discussions with you. Is that
12 correct?

13 A It was based on discussions with myself, Mary Erdoes, Catherine Keating, John Duffy,
14 and I believe it's Mary Casey.

15 Q Can you explain how this banking-only relationship was different from the one that
16 Mr. Epstein previously had with J.P. Morgan?

17 A Again, the principal activity of the bank was to manage assets, provide brokerage, all
18 sorts -- you know, "investing" in the broadest sense. And I think that's what was withdrawn as a
19 banking service for Epstein, and was only left with essentially his checking account. So the bank
20 would've seen that as a major move against a client.

21 Q But he still had that account, correct?

22 A He still had a checking account.

23 Q And he could still open up other accounts, correct?

24 A Again, I don't know. That would surprise me, but --

25 Q It would surprise you if he could open up checking accounts?

1 A I think you'd be allowed -- well -- allowed to have checking accounts. I don't know
2 exact- -- you know, I'm not sure. I think it depended.

3 Q The document is dated October 17th, 2006. Is that when this decision was made?

4 A That's what it seems like, yes.

5 Q Why did it take so long to make this decision?

6 A I don't know. I mean -- yeah.

7 Q As you know, in 2008, Mr. Epstein pleaded guilty to one count of soliciting prostitution
8 and one count of soliciting prostitution from a minor and was sentenced to 18 months in the Palm
9 Beach stockade.

10 When did you learn that Mr. Epstein had pleaded guilty to these counts?

11 A When he pled guilty.

12 Q And how did you learn it? Did he tell you?

13 A No. I think I just -- in the -- in the press.

14 Q Did you talk to anyone at J.P. Morgan about the fact that he had pleaded guilty to these
15 counts?

16 A I'm sure I did, yes.

17 Q Do you remember who?

18 A Again, I think I talked with Jamie Dimon about it. I imagine I talked with Mary Erdoes
19 about it.

20 Q I'd like to introduce as minority exhibit R an email exchange between two J.P. Morgan
21 employees -- Kevin McCleerey and Anne Verdon -- from July 15th, 2008.

22 [Staley Minority Exhibit R.

23 was marked for identification.]

24 BY [REDACTED]:

25 Q It appears to be in reference to a meeting regarding Mr. Epstein.

1 In the first exchange, Mr. McCleerey writes to Ms. Verdon, quote, "FYI Jes spoke to Lisa
2 Waters and told her he wants to keep his accounts."

3 This was shortly after Mr. Epstein started his sentence at the Palm Beach stockade.

4 Why did you want J.P. Morgan to keep Mr. Epstein's accounts?

5 A Again, I think, at that time, the only activity he had with the bank was his checking
6 account, and the move against his relationship with the bank had already occurred. And it seemed
7 to me, closing a checking account is a tough move, and --

8 Q But weren't those checking accounts facilitating his sex trafficking?

9 A I was completely unaware of that.

10 Q You weren't aware of cash withdrawals at this point?

11 A I was unaware that his checking account was involved in his illegal activity.

12 Q But you were part of internal discussions that informed the decision to make him a
13 banking-only client, correct?

14 A Yes, but I wasn't on the Rapid Response Team, but I was part of that decision.

15 Q I understand you weren't on the Rapid Response Team --

16 A I was informed about it, yes.

17 Q -- but you were part of discussions that informed that decision. And in the document
18 we looked at earlier, it says, "Cash withdrawals are routinely made in amounts for \$40,000 to
19 \$80,000 several times a month."

20 A That was --

21 Q So --

22 A That was in the report in the Rapid Response Team. That was not -- that was not
23 communicated to me.

24 Q You did not know about the significant cash withdrawals in 2006?

25 A I don't believe I did, no.

1 Q And you did not know about them in 2008?

2 A I learned at some point, but I need to think about what year I learned. But it
3 was -- again, cash withdrawals of that are a huge red flag and should be going -- in fact, you need
4 to -- technically, you should be informing the Federal authorities, I think on a quarterly basis.

1 [3:00 p.m.]

2 BY [REDACTED]:

3 Q Sure. But here you are saying -- or rather here two employees are talking about how
4 you want J.P. Morgan to keep Mr. Epstein's accounts in July of 2008. So shortly after he started
5 serving his sentence. And those cash accounts are the things that are allowing him to facilitate this
6 sex trafficking.

7 A Yeah, I was saying allowed to keep -- well, because you're making the implication that I
8 knew that continuum. All I was suggesting was to keep his checking account. I was not aware of
9 the cash payments and what he was doing with that amount of cash.

10 Q So to be clear, your testimony is that you had no awareness of the cash payments --

11 A At some point, I --

12 Q -- in July of 2008.

13 A Again, I don't know the exact timing when I learned about his cash.

14 Q Right, but the timing is relevant because you were advocating for J.P. Morgan to keep
15 his cash accounts?

16 A To keep his checking account.

17 Q Correct. Thank you.

18 So were you aware of the significant cash withdrawals in July of 2008?

19 A And I am saying I don't know exactly what date I became aware of it.

20 Q So you may have been aware of them then and still have been advocating for J.P.
21 Morgan to keep his accounts.

22 A I may or I may not have.

23 Ms. Stansbury. Hello.

24 Mr. Staley. Hello.

25 Ms. Stansbury. It's been a long day.

1 My questions are a little more narrative and broad in scope than the specificity of interactions
2 trying to really piece together some of the stories and timeline.

3 But my opening question is really I am curious about your relationship with Epstein's trusts.
4 Are you --

5 Mr. Staley. His trusts?

6 Ms. Stansbury. His trusts. Are you affiliated with any trusts currently or have you been
7 over the last 10 years?

8 Mr. Staley. Currently, no. And at the time of --

9 Ms. Stansbury. Or, I'm sorry, since 2019, since he's died.

10 Ms. Staley. I believe that there was a time when I was a signator where I signed as either
11 executor or trustee to his trust.

12 Ms. Stansbury. And is that his personal estate trust?

13 Mr. Staley. I believe it was.

14 Ms. Stansbury. Okay. And so you were one of the three executors of that trust?

15 Mr. Staley. At a point in time.

16 Ms. Stansbury. Okay.

17 Mr. Staley. But then I declined it.

18 Ms. Stansbury. Did -- oh, go ahead.

19 Mr. Staley. So I declined it, and ultimately was not and am not an executor or trustee, nor
20 have I ever received compensation as such.

21 Ms. Stansbury. So that is my next question. Have you received any compensation from his
22 estate --

23 Mr. Staley. No.

24 Ms. Stansbury. -- since 2019?

25 Mr. Staley. No.

1 Ms. Stansbury. Okay. Going back to the questions about J.P. Morgan. And just to
2 reiterate, so J.P. Morgan began its relationship with Mr. Epstein several years before you took over
3 that account, correct?

4 Mr. Staley. Yes.

5 Ms. Stansbury. Okay. And just trying to understand your management of Mr. Epstein's
6 account. I understand you were an executive as opposed to kind of a day-to-day account manager.
7 So what was the nature of your management of that relationship? Or what did it entail?

8 Mr. Staley. I was introduced to J.P. Morgan by -- or to Jeffrey Epstein by the then-CEO of J.P.
9 Morgan with the idea that Jeffrey had a network of ultra high net worth individuals, particularly in
10 New York, that might benefit the Private Bank. So it was around those contacts, and we went
11 through a list of wealthy, influential people that he introduced to us.

12 Ms. Stansbury. Did you not oversee or manage in any way the transactions of Epstein's --

13 Mr. Staley. No.

14 Ms. Stansbury. -- personal or business accounts?

15 Mr. Staley. No.

16 Ms. Stansbury. Did you ever --

17 Mr. Staley. I had no involvement in his individual accounts.

18 Ms. Stansbury. Did you have any knowledge of how those accounts were being financially
19 managed, the source of wealth --

20 Mr. Staley. No.

21 Ms. Stansbury. -- how wealth was being moved?

22 Mr. Staley. No. I always had a question about how he -- how -- where his wealth came
23 from. The only thing I was aware of was he had a close relationship with Les Wexner.

24 Ms. Stansbury. And so your management of the relationship with Mr. Epstein was more of a
25 kind of glad-handling, business management, client management kind of relationship? Is that what

1 you would say? Or how would you describe it?

2 Mr. Staley. Just knowing or having a relationship with a client of the Private Bank who had
3 an incredible network and was willing to share that network with the bank. And then, as I said
4 earlier, he was instrumental in a very important transaction for J.P. Morgan and for my career in
5 about 2004.

6 Ms. Stansbury. What transaction was that?

7 Mr. Staley. Which is the acquisition of Highbridge Capital Corporation.

8 Ms. Stansbury. Okay.

9 Mr. Staley. So Morgan was a traditional asset management firm.

10 Back then, tradition asset managers like Fidelity and Capital would not mix with alternative
11 asset managers. And this really was the first time in the industry that that happened, and it
12 changed dramatically the trajectory of Morgan's asset management business.

13 Ms. Stansbury. Okay. And in terms of your relationship, I mean, whether it was personal
14 or not personal, whether it was business, you did travel to Mr. Epstein's island on several occasions,
15 correct?

16 Mr. Staley. I went there once with my family. I stopped there once for a couple hours for
17 a lunch. And then I transited from -- I used his island as a transit to St. Thomas on a helicopter.
18 But in terms of the visit per se --

19 Ms. Stansbury. And was Mr. Epstein present during any of those visits?

20 Mr. Staley. So in terms of the visit per se, I would say only once.

21 Ms. Stansbury. Okay. Sorry.

22 Was Mr. Epstein present during any of those visits?

23 Mr. Staley. During the visit with my family, yes, he was there. And when we stopped by
24 for lunch, he was there.

25 Ms. Stansbury. And you visited Mr. Epstein's townhouse a number of times, correct?

1 Mr. Staley. Correct.

2 Ms. Stansbury. Did you ever attend any social functions at his house that might be
3 characterized as parties or dinners or anything like that?

4 Mr. Staley. Lunches or dinners, yes. Parties? I wouldn't characterize them as parties.

5 Ms. Stansbury. Did you ever witness any women there in a social capacity during your time
6 at the island or at the townhouse in New York?

7 Mr. Staley. No. Some of his guests, like at a lunch, would be women from academia or the
8 media. I can give you names.

9 Ms. Stansbury. And then I just want to go back to the peculiar exchange via email in 2010.
10 Why were you emailing Jeffrey Epstein about women and referring to these women by Disney
11 characters?

12 Mr. Staley. By what?

13 Ms. Stansbury. By Disney character names, like Snow White. Just why? I mean, just to
14 help us understand why.

15 Mr. Staley. Yeah, again, I don't recall Snow White. It's over a 15-year period and
16 thousands of emails. There's one email I don't recall.

17 Ms. Stansbury. Just give us a little insight. Why would you have been emailing Mr. Epstein
18 about women and calling them these kind of nicknames?

19 Mr. Staley. Again, I don't -- it may have happened on one or two occasions. I don't think I
20 made a practice of doing that.

21 Ms. Stansbury. I'm sorry, say that again.

22 Mr. Staley. I don't think I did that as a practice.

23 Ms. Stansbury. Well, we have -- the emails were just presented to you.

24 Mr. Staley. Yes, but --

25 Ms. Stansbury. You're not going to answer the question?

1 Mr. Staley. I think I did answer the question.

2 Ms. Stansbury. What is your answer?

3 Mr. Staley. And, again, I think it happened -- I don't remember Snow White, I don't
4 remember the email. And over the span of my relationship with him, 2,000 emails and whatnot, I
5 don't think -- so that is my answer.

6 Ms. Stansbury. Thank you.

7 [REDACTED]. That concludes the second round of the minority's questioning. We'll go off
8 the record.

9 [Recess.]

10 BY MS. TOLAN:

11 Q Just a few follow-up questions on something we were discussing earlier.

12 Were you aware that [REDACTED] was a victim of Jeffrey Epstein's?

13 A No, I was not.

14 Q Did you ever become aware?

15 A No.

16 Q The committee has reviewed documents that show [REDACTED] was emotionally and
17 physically abused by Jeffrey Epstein for many years. Did she ever mention anything to you that
18 caused you concerns about her working for Mr. Epstein?

19 A No, she did not.

20 Q Did she ever mention to you that Mr. Epstein would instruct her on how to dress and
21 where she could go or other restrictions?

22 A No, she did not.

23 Q Were there any other red flags that she might have mentioned to you or that you might
24 have saw?

25 A No.

1 Q Do you know if Jeffrey Epstein was involved in securing her apartment lease at East 301
2 66th Street?

3 A I was aware that the apartment was owned by his --- or the apartment building was
4 owned by his brother and so there was that connection.

5 Q But do you know if Mr. Epstein was directly involved in [REDACTED] lease at the building?

6 A I don't know.

7 Q Do you know if he paid her rent?

8 A I do not know.

9 Q Did he direct her to live there?

10 A I don't know.

11 Q That's all.

12 BY MS. BRIGNAC:

13 Q Mr. Staley, bear with me if I ask you any repetitive questions to make sure the record is
14 clear.

15 You mentioned that Mr. Epstein explained he would use cash withdrawals for flight fuel.

16 Did you ever alert him that his cash withdrawals were flagged by the bank as suspicious?

17 A I think Paul Morris did.

18 Q Did you?

19 A I don't know if I had a conversation with Jeffrey about the cash withdrawals. I think
20 they were a red flag and the bank should notice it. So I probably did.

21 Q Did you ever alert Mr. Epstein that he was categorized as a high-risk client?

22 A I believe so, yes.

23 Q When would this have been?

24 A After 2006, I think.

25 Q What was his response?

1 A I don't recall.

2 Q Did he ask you to give any input with the bank in their consideration of his
3 categorization?

4 A No.

5 Q Did you ever advise Mr. Epstein on how to structure cash withdrawals?

6 A Never.

7 Q Did you ever advise Mr. Epstein on how to avoid flags by J.P. Morgan?

8 A Never.

9 Q Did you ever advise Mr. Epstein on how to change his categorization as a high-risk
10 client?

11 A Never.

12 Q Is there any appeal process at J.P. Morgan for a client who is flagged as high risk?

13 A An appeal process?

14 Q Uh-huh.

15 A I imagine someone could go to the compliance department or legal department and ask
16 for it to be reviewed, but I don't know that there is a formal appeal process.

17 Q Have you ever asked Mr. Cutler to hear out any other client who is at risk of losing their
18 membership at J.P. Morgan?

19 A Not that I recall.

20 Q Why did you do this for Mr. Epstein?

21 A I knew him. You know, again, he made important referrals to the bank. And so I
22 asked Steve Cutler to get involved.

23 And also Epstein I think had hired some very high-profile lawyers and I thought that they
24 could connect with Steve Cutler to get to the right conclusion.

25 Q Do you think the fact that Mr. Cutler met with Mr. Epstein on this swayed the bank's

1 decision to retain Mr. Epstein as a client?

2 A I think Steve Cutler would have had the authority to change the bank's position if he felt
3 that that was necessary.

4 Q Did you ever hear about what the conversation between Mr. Epstein and Mr. Cutler
5 was?

6 A No. Not that I recall.

7 Q Did you hear that they did have a meeting?

8 A I believe that they met, yes.

9 Q Was Mr. Epstein always with the Private Bank of J.P. Morgan?

10 A As opposed to?

11 Q Any other division at J.P. Morgan.

12 A Yes, it was always the Private Bank.

13 Q Have you ever interacted with Mr. Indyke, Richard Indyke?

14 A I think I met him, but I wouldn't say I interacted with him.

15 Q I apologize. Have you ever interacted with Darren Indyke?

16 A Oh. I wouldn't say interact with him. I crossed him in Mr. Epstein's office once or
17 twice, but didn't interact with him.

18 Q Have you ever interacted with Richard Kahn?

19 A No.

20 Q Did you ever work with Darren Indyke on a transaction for Mr. Epstein?

21 A No.

22 Q Were you ever trained on suspicious activity report requirements?

23 A You know, I had to pass things like Series 7 exams and other exams and whatnot. But I
24 don't know if I had a specific course.

25 Q Did you ever discuss requirements with Mr. Epstein?

1 A No.

2 Q Do you still bank with J.P. Morgan?

3 A No.

4 Q Why did you change banks?

5 A I was asked to withdraw my accounts.

6 Q By who?

7 A By J.P. Morgan.

8 Q By who at J.P. Morgan?

9 A I don't recall.

10 Q Why did they ask you to withdraw your accounts?

11 A I think because of the issues around Epstein.

12 Q Does J.P. Morgan blame you for their reputational damage caused by Mr. Epstein?

13 A I believe they have, yes.

14 Q Do you agree with them on that?

15 A No.

16 Q What do you think J.P. Morgan could have done differently?

17 A I think, as I said, everything from rapid response teams to compliance, to legal, to credit,
18 you have this enormous infrastructure in the bank. The banking team itself, they were responsible
19 for his accounts, knowing what's going on in accounts, monitoring his accounts.

20 I was the senior executive for most of the time running the Investment Bank. And yet, the
21 bank places responsibility on my shoulders as opposed to what clearly was the responsibility of the
22 bank.

23 Q Did you ever tell anyone at the bank that they should react differently?

24 A Again, I was running the Investment Bank, but clearly encouraged the bank to do its
25 investigations, to manage the account properly, to file the proper reports with the authorities, and to

1 do the right thing.

2 Q Who did you make these requests to?

3 A I think it would have been in the conversations with people like Steve Cutler, like
4 Langford, like Mary, and others.

5 Q Why then ask Steve Cutler to hear Mr. Epstein out if you think they should have acted
6 differently in retaining him as a client?

7 A I think one doesn't have to do with the other. Just having the chief counsel of the bank
8 listen to Jeffrey Epstein before the bank makes -- or as the bank makes its decision what to do with
9 his accounts made sense. The bank would be most informed, the most senior officer responsible
10 for it would be informed, and they would hopefully make the right decision.

11 Q Did you ever loan Mr. Epstein money?

12 A No.

13 Q Are you aware of Mr. Epstein exerting influence on J.P. Morgan to convince them to
14 grant loans?

15 A No.

16 Q Did Mr. Epstein ever procure loans for Leon Black from J.P. Morgan?

17 A Did he ever procure loans? Leon Black borrowed in his own right.

18 Q Did Mr. Epstein say anything to J.P. Morgan to influence their granting of a loan to Leon
19 Black?

20 A Not that I'm aware of.

21 Q Were you involved in any loans for Leon Black?

22 A Directly, no.

23 Q How were you involved indirectly?

24 A Indirectly? No, I was not involved with loans to Leon Black.

25 Q Who would have been responsible for handling loans for Mr. Black?

- 1 A His bankers in the credit department.
- 2 Q Who was his banker?
- 3 A I don't know.
- 4 Q Was it Justin Nelson?
- 5 A It could have been at one point, yes.
- 6 Q Did you ever speak to Mr. Nelson about loans for Leon Black?
- 7 A Not that I recall, no.
- 8 Q Did Mr. Epstein speak with Mr. Nelson about loans for Leon Black?
- 9 A Not that I know of.
- 10 Q Did you ever ask J.P. Morgan to grant Mr. Epstein a loan?
- 11 A No. I know he asked for a loan, but I believe it was -- no. But, no, I did not ask the
- 12 bank to grant Epstein a loan.
- 13 Q What did he ask for a loan for?
- 14 A Again, I'm not sure. I think at one point he asked whether the bank would extend
- 15 credit to a modeling agency.
- 16 Q How did you become aware of that?
- 17 A I don't know. My recollection is through the press.
- 18 Q Were you ever made aware of his request for a line of credit during your time at J.P.
- 19 Morgan?
- 20 A I believe so, yes.
- 21 Q Who would have told you?
- 22 A I don't know.
- 23 Q Did you work on granting this line of credit?
- 24 A No.
- 25 Q The New York Times has reported that J.P. Morgan provided financial backing for Mr.

1 Epstein to help Jean-Luc Brunel start a modeling agency called MC2. Some of Mr. Epstein's
2 underage victims said MC2 lured them to the United States with the prospect of paid modeling work.
3 And Brunel was arrested in France in 2022 for charges of raping teenage girls.

4 Who authorized the line of credit?

5 A I don't know.

6 Q Have you ever met anyone who worked for MC2?

7 A No.

8 Q Have you ever met Jean-Luc Brunel?

9 A No.

10 Q Were you aware of the DOJ's investigation into whether Mr. Brunel's MC2 modeling
11 agency was feeding girls and women into Mr. Epstein's suspected sex trafficking network?

12 A No.

13 Q Was anyone aware of this investigation at J.P. Morgan?

14 A I don't know.

15 Q Did Mr. Epstein ever try to secure banking ties at Barclays in any way once you became
16 CEO?

17 A No.

18 Q Did you ever discuss Barclays with Mr. Epstein?

19 A Yes.

20 Q What did you discuss?

21 A We discussed the discussions I had with Barclays in 2012. And then I told Epstein,
22 when I was offered the job in 2015, that I would cease all contact and relationships with him.

23 Q Did Mr. Epstein ask why?

24 A No. I think it was obvious why.

25 Q How did he respond?

1 A He understood.

2 Q Where were you when you told him this?

3 A I believe I was in New York. It was by phone.

4 Q Okay. A crucial part of the committee's investigation is to better understand how
5 Jeffrey Epstein and Ghislaine Maxwell used their connections to prominent individuals to curry favor
6 and shield themselves from scrutiny.

7 I am going to read you a list of names. Please say yes or no to the following question and
8 then I will ask you to elaborate.

9 The question is, have you ever met with or communicated with any of the following people
10 regarding any crimes committed by Jeffrey Epstein or Ghislaine Maxwell?

11 Frederic Fekkai?

12 A No.

13 Q Philip Levine?

14 A Can you ask the question again?

15 Q Yes. The question is, have you ever met with or communicated with any of the
16 following people regarding any crimes committed by Jeffrey Epstein or Ghislaine Maxwell.

17 Frederic Fekkai?

18 A No.

19 Q Philip Levine?

20 A No.

21 Q Andrew Mountbatten-Windsor, formerly known as Prince Andrew?

22 A Let's come back to his name.

23 Q Sultan Ahmed bin Sulayem?

24 A No.

25 Q Jean-Luc Brunel?

- 1 A No.
- 2 Q Leon Black?
- 3 A No.
- 4 Q Terje Rod-Larsen?
- 5 A Go back to his name again, please.
- 6 Q Okay. Terje Rod-Larsen?
- 7 A No.
- 8 Q George Mitchell?
- 9 A No.
- 10 Q Glenn Dubin?
- 11 A Let's go back to him as well.
- 12 Q Eva Andersson-Dubin?
- 13 A Back to her as well.
- 14 Q Sergey Brin?
- 15 A No.
- 16 Q Mort Zuckerman?
- 17 A No.
- 18 Q Peter Mandelson?
- 19 A No.
- 20 Q Andrew Farkas?
- 21 A No.
- 22 Q Boris Nikolic?
- 23 A No.
- 24 Q David Gergen?
- 25 A No.

- 1 Q Larry Summers?
- 2 A No.
- 3 Q Les Wexner?
- 4 A No.
- 5 Q Jack Kessler?
- 6 A No.
- 7 Q Steve Sinofsky?
- 8 A No.
- 9 Q Kathryn Ruemmler?
- 10 A No.
- 11 Q Harvey Weinstein?
- 12 A No.
- 13 Q Woody Allen?
- 14 A No.
- 15 Q Bill Gates?
- 16 A No.
- 17 Q Elon Musk?
- 18 A No.
- 19 Q Bill Richardson?
- 20 A No.
- 21 Q Ariane de Rothschild?
- 22 A No.
- 23 Q Any other member of the Rothschild family?
- 24 A No.
- 25 Q President Bill Clinton?

1 A No.

2 Q Secretary Hillary Clinton?

3 A No.

4 Q Doug Band?

5 A No.

6 Q Ted Waitt?

7 A No.

8 Q Ehud Barak?

9 A No.

10 Q Benjamin Netanyahu?

11 A No.

12 Q Okay. Returning to --

13 A If you can ask the question again.

14 Q Sure.

15 Have you ever met with or communicated with any of the following people regarding any
16 crimes committed by Jeffrey Epstein or Ghislaine Maxwell?

17 A Okay.

18 Q Andrew Mountbatten-Windsor, formerly known as Prince Andrew?

19 A No.

20 Q Leon Black?

21 A Skip it. We'll go back to that.

22 Q Glenn Dubin?

23 A No.

24 Q Eva Andersson-Dubin?

25 You could also tell us what you do know and that would be helpful for the committee's

1 investigation.

2 A Do I know?

3 Q If you recall speaking to them at a different time period about the crimes. Anything
4 you recall.

5 A No, I think I would have talked with Glenn and Eva. I think I had -- I think I talked to
6 Leon Black. So those three, yes. Let's keep going.

7 Q Those are all of the ones you asked me to return to.

8 So Prince Andrew?

9 A No.

10 Q So regarding Leon Black, what did you discuss?

11 A I just think we discussed -- again, I don't -- the crimes that Epstein was brought down
12 with, that's what I think we discussed.

13 Q And when was this?

14 A I don't know exactly when it was.

15 Q Was it after his 2008 conviction?

16 A Yes, yes.

17 Q Where were you?

18 A I don't recall.

19 Q Who else was present?

20 A I don't think anybody was.

21 Q What did Leon Black say?

22 A I don't recall.

23 Q What was his attitude towards Mr. Epstein's conviction?

24 A Oh, I think -- I don't -- I'm not going to characterize -- I don't know.

25 Q How did you perceive his reaction to be?

1 A I think we were all: It was terrible what he was convicted of and it was a horrible thing
2 what Epstein did. I think we both responded to how -- we both knew him and both responded to
3 how terrible his actions were or what he did.

4 Are you talking about 2019?

5 Q It could also be 2019. Any of the crimes of Mr. Epstein, Ghislaine Maxwell, have you
6 discussed them with Leon Black?

7 A 2019? No.

8 Q Glenn Dubin?

9 A I don't -- again, 2019, I'm sorry. It possibly was 2019.

10 Q And when would this have been?

11 A With Glenn Dubin?

12 Q When would you have discussed the 2019 --

13 A I don't --

14 Q -- crimes with Leon Black?

15 A I don't recall.

16 Q But you recall you did discuss them with Mr. Black?

17 A 2019 crimes? Yeah, I don't recall if I did. So I would scratch Leon Black. I would say
18 with Glenn and Eva Dubin.

19 Q But you did meet with Mr. Black about the 2008 conviction?

20 A I met with Leon Black about business and other things and we may have talked about it,
21 but I didn't meet him for the purpose of talking about 2008 or 2019.

22 Q What did you discuss with Glenn Dubin?

23 A Glenn and Eva and I are good friends. I think we just talked about Epstein overall.
24 We didn't talk any specifics about the crimes committed and whatnot, but just -- it impacted both of
25 our lives dramatically. I think we talked about that.

1 Q How did it impact their lives dramatically?

2 A I think both the Dubins and I have been ostracized by part of society, have been
3 excluded from institutions that we were a part of before. So investments that we've made we've
4 had to turn away from.

5 Q How did you -- have you met Benjamin Netanyahu?

6 A Once.

7 Q Where was this?

8 A In the Prime Minister's office in Israel.

9 Q Who else was present?

10 A Just me.

11 Q Did Mr. --

12 A I think he had, like, a secretary there as well.

13 Q Did Mr. Epstein facilitate this meeting?

14 A Yes, he did.

15 Q Why?

16 A I asked him to.

17 Q Why?

18 A I asked him to. He knew that I was trying to meet with the Prime Minister and I was
19 having difficulty getting on his calendar. And I mentioned that to Epstein, and then I met with the
20 Prime Minister.

21 Q What was Mr. Epstein's relationship to Benjamin Netanyahu?

22 A I just think he knew him, that's all.

23 Q How would you characterize their relationship?

24 A I didn't know -- I wouldn't characterize it.

25 Q Why would you ask Mr. Epstein to help you get on his calendar?

1 A I think he had relationships with individuals in Israel. He knew Ehud Barak well. And I
2 think he may have mentioned that he knew Benjamin Netanyahu. So I asked if he could help get
3 me a meeting.

4 Q When did you meet with Mr. Netanyahu?

5 A I don't recall.

6 Q Why were you attempting to get onto his calendar?

7 A I was visiting Israel on business and thought it would be of interest to meet with the
8 Prime Minister.

9 Q Would you say this was around March 2011?

10 A It could have been.

11 Q What did you discuss at the meeting?

12 A I just think we talked about the Middle East and geopolitics, nothing specific.

13 Q Why would Benjamin Netanyahu agree to meet with you when there was no set topic?
14 What did he believe the reason was for the meeting?

15 A It's possible -- I don't want to speculate. It was a long time ago.

16 Q Why was he also interested in meeting with you?

17 A This is 2011?

18 Q Uh-huh.

19 A I was a senior executive of J.P. Morgan. J.P. Morgan had a lot of business in the Middle
20 East.

21 Ms. Tolan. So you were meeting with him on behalf of J.P. Morgan?

22 Mr. Staley. Yes.

23 BY MS. BRIGNAC:

24 Q Have you ever met with Benjamin Netanyahu with Mr. Epstein?

25 A No.

1 Q What was Mr. Epstein's relationship with Ehud Barak?

2 A I think they knew each other and Ehud Barak would visit Epstein when he came to New
3 York occasionally.

4 Q Have you taken a meeting with Ehud Barak and Mr. Epstein?

5 A I don't recall. I may have.

6 Q What would you have met with Ehud Barak and Mr. Epstein about?

7 A Just talked about geopolitics.

8 Q You testified in a previous hour that you have had interactions with foreign intelligence
9 agents. Did you have any reason to --

10 A No, I didn't say foreign intelligence agents. I said the CIA and the State Department,
11 not foreign agents.

12 Q Okay.

13 Mr. Emmer. During your interactions with Ehud Barak and Jeffrey Epstein, did you ever
14 discuss anything that related to foreign intelligence?

15 Mr. Staley. No.

16 BY MS. BRIGNAC:

17 Q On July 6th, 2019, Mr. Epstein was arrested at Teterboro Airport on Federal sex
18 trafficking charges.

19 When did you first become aware of the charges?

20 A I believe when he got arrested.

21 Q How?

22 A The press.

23 Q Did anyone tell you directly? Did anyone verify what was in the press?

24 A No.

25 Q When you learned of the gravity of what he was being charged with, what did you do

1 next?

2 A I had no contact with Epstein at that time. I was running the bank in London, so I did
3 nothing specifically related to the fact that he got arrested.

4 Q Did you reach out to anyone in Epstein's orbit to test the veracity of the allegations he
5 was faced with?

6 A No.

7 Q Did you ever visit Mr. Epstein at the Metropolitan Correctional Center?

8 A No.

9 Q Can you describe your communications with Mr. Epstein in the days between his arrest
10 in July 2019 until his death?

11 A None.

12 Q Did any alleged victim of Mr. Epstein contact you after his arrest?

13 A No.

14 Q I believe you testified to this in a previous hour, but have you ever been appointed as a
15 trustee by Mr. Epstein?

16 A I was appointed as an executor of his estate at a point in time. And then I resigned and
17 at the end was not an executor or trustee to his estate.

18 Q Would it be accurate to say you signed as a trustee in November 2014 for the Epstein
19 2014 Trust and you also signed an amendment to this trust in September 2015?

20 A Yes.

21 Q What were your duties and responsibilities?

22 A None.

23 Q Who asked you to be trustee?

24 A I believe Epstein did.

25 Q Why?

1 A I was a senior person in finance. So I think he trusted my judgment. But ultimately I
2 declined.

3 Q Why?

4 A Because I didn't want to be associated with the Epstein estate.

5 Q Was it related to your agreement with Barclays in 2015?

6 A No, I think it was just I didn't want to be part of his estate.

7 Q What was the Epstein 2014 Trust for?

8 A I don't recall.

9 Q Why would you not want to be associated with the estate?

10 A Because of his convictions and what he was -- because of his convictions.

11 Q What changed in 2014 to result in your belief that you'd prefer to be separated from the
12 estate?

13 A The passage of time and wanting to be -- and realizing that I need to separate myself
14 from Epstein.

15 Q Did you hear any rumors of other allegations at that time?

16 A No.

17 Q Were you ever compensated for serving as trustee?

18 A No.

19 Q Who first told you of your appointment to his estate?

20 A I don't recall.

21 Q Were you aware of civil litigation against Mr. Epstein at the time you asked to cease
22 communications with him?

23 A No.

24 Q Mr. Epstein also appointed Lawrence Summers as an executor of his estate in 2014,
25 though he was also not named in the will from 2019. Were you ever aware of Mr. Summers'

1 designation in 2014?

2 A I may have been, but I don't recall.

3 Q Who would have told you?

4 A Larry Summers.

5 Q What was your relationship with Larry Summers?

6 A We knew each other. I think I met him in his capacity at Harvard. And I believe we
7 met when he was Secretary of Treasury as well.

8 Q Who introduced you to Mr. Summers?

9 A I think we just met because we are in the same -- I think our paths just crossed.
10 Nobody made the introduction per se.

11 Q What was Mr. Summers' relationship with Mr. Epstein?

12 A I don't know.

13 Q Would you agree that his designation as executor of Mr. Epstein's estate means he was
14 someone trusted by Mr. Epstein?

15 A Sure.

16 Q And same question for yourself. Would you agree that you were highly trusted by Mr.
17 Epstein to be appointed executor of his estate?

18 A Sure.

19 Q Why do you think that is?

20 A Because I think when you appoint someone as an executor of your estate, you trust
21 them.

22 Q Now, why did Mr. Epstein trust you to that degree?

23 A The same answer.

24 Q What answer is that?

25 A Oh, I think he saw me as someone who's trustworthy.

1 [Discussion off the record.]

2 Ms. Brignac. We will go back on the record.

3 BY MS. BRIGNAC:

4 Q Have you had any conversations with Mr. Summers about the estate?

5 A One thing I want to clarify is I did not see the documents with respect to his estate and
6 so I don't recall the documents, just to be clear on that.

7 Q Did you ever discuss the estate with Mr. Summers?

8 A No.

9 Q When did you learn of Mr. Epstein's death?

10 A I believe the day he died.

11 Q How did you learn?

12 A My wife told me that she heard it.

13 Q Who did she hear it from?

14 A I don't know.

15 Q What did you do after you hearing about his death?

16 A Nothing.

17 Q Who did you speak to next?

18 A I don't recall.

19 Q Did Mr. Epstein demonstrate suicidal tendencies in all the years you've known him?

20 A No.

21 Q Do you believe Mr. Epstein committed suicide?

22 A Yes.

23 Q Why?

24 A That's what the police say.

25 Q How many lawsuits have you ever appeared as the defendant in?

1 A I think the lawsuit of the U.S. Virgin Islands against J.P. Morgan, I believe I was a named
2 defendant.

3 Q Is that the only one?

4 A No, I think there is a current lawsuit against Barclays where I am a named defendant.
5 Those would be the two.

6 Mr. Sullivan. We can clarify that for you on the record. He was not a defendant. He was
7 a third-party defendant in the J.P. Morgan lawsuit. And there is one other class action that relates
8 to stock, which we can provide.

9 BY MS. BRIGNAC:

10 Q How many lawsuits are you named as the defendant and related to your work with Mr.
11 Epstein?

12 A I don't believe any.

13 Q How many lawsuits are you listed as the defendant in that reference sexual abuse?

14 A I believe one.

15 Q At any point, have you or any of your representatives or agents secured a settlement in
16 connection with Mr. Epstein, Ghislaine Maxwell, or any of their victims?

17 A No.

18 Q Reporting in documents reviewed by this committee reflect that a victim of Mr. Epstein
19 settled with his estate and received 6 million as part of the victims' compensation fund. However,
20 Mr. Staley, you and Leon Black are explicitly carved out of this settlement, and the effect of this
21 carve-out allows the victim to sue you and Mr. Black in the future.

22 Why were you carved out of this settlement?

23 A I don't know.

24 Q When did you become aware you were carved out of the settlement?

25 Mr. Sullivan. That is probably privileged.

1 BY MS. BRIGNAC:

2 Q Did anyone besides your attorney tell you you were carved out of the settlement?

3 A No.

4 Q Who is the victim in that settlement?

5 A I don't know.

6 Q Which case are you listed in that relates to sexual abuse?

7 Mr. Sullivan. It's a little confusing. Maybe we can help, if you'd care to hear from me
8 quickly on that.

9 The J.P. Morgan lawsuit is dismissed. He was a third-party defendant. J.P. Morgan settled.
10 There was no claim against him by a victim in the sense of he would pay anything. So it was a
11 third-party complaint. The case is settled. Mr. Staley paid nothing.

12 Secondly, there is a class action, the essence of which is -- and that is on the West Coast -- and
13 that is a claim that Barclays and Staley combined failed to provide accurate information about the
14 relationship.

15 And there is one other one we are just finding out about that seems to be -- I'm not even sure
16 what it is. But I can find it.

17 Ms. Brignac. Mr. Staley, which case were you referring to when you said you're listed in one
18 case related to sexual abuse?

19 Mr. Staley. The one filed against J.P. Morgan.

20 [Staley Majority Exhibit No. 9.

21 was marked for identification.]

22 Ms. Brignac. I am entering majority exhibit 9 from The Wall Street Journal.

23 We'll go off the record.

24 [Discussion off the record.]

25 BY MS. BRIGNAC:

1 Q Mr. Staley, who is the woman in this photograph?

2 A I believe it's [REDACTED]. Is that right?

3 Q Have you ever met this woman before?

4 A I just recognize another photo that I have been shown by my lawyers that she is in, but I
5 don't recognize her per se, no.

6 Q Have you ever had sex with this woman?

7 A No.

8 Q The committee has identified this woman to be [REDACTED], the same woman
9 who is dressed in the Snow White costume. Have you ever seen this woman dressed in a Snow
10 White costume?

11 A No.

12 Ms. Brignac. That will conclude the majority's questions. We'll go off the record.

13 [Recess.]

14 [REDACTED]. We're back on the record.

15 [Staley Minority Exhibit S.

16 was marked for identification.]

17 BY [REDACTED]:

18 Q Mr. Staley, I would like to pick up where we left off, which is around 2008. I would like
19 to introduce as minority exhibit S an internal J.P. Morgan document logging comments from rapid
20 response meetings about Mr. Epstein. The document we are handing you is an excerpt of a larger
21 document.

22 On page 15, there is an entry from July 15th, 2008. In one column it states, quote, "Follow
23 up meeting after news that Epstein was sentenced to 12 months in jail for solicitation of a prostitute
24 and six months for procuring a person under the age of 18 for prostitution."

25 In a corresponding column it states, quote, "Catherine will go back to JES to tell him we are

1 uncomfortable with Epstein and do not want to go to Cutler for approval."

2 Catherine refers to Catherine Keating, correct?

3 A Could be.

4 Q Do you know of another Catherine who was involved in Mr. Epstein's accounts at this
5 time?

6 A No.

7 Q Ms. Keating was head of J.P. Morgan's Private Bank starting in 2009, correct?

8 A Correct.

9 Q Who does the "we" in "we are uncomfortable with Epstein" refer to?

10 A I don't know.

11 Q Could it refer to the employees at the Private Bank?

12 A Yes.

13 Q Do you remember Ms. Keating coming to you about Mr. Epstein during this period?

14 A I believe we talked about Epstein, yes.

15 Q When was that?

16 A Again, this is dated July 2008.

17 Q July 15th, 2008, correct, but it says, "Catherine will go back to JES."

18 A I would say it is around that date.

19 Q Do you remember what she said?

20 A No.

21 Q Presumably it was about Mr. Epstein, correct, and concerns that the Private Bank had
22 with him?

23 A And whether they kept accounts with him, yes.

24 Q And do you remember how you responded to those concerns?

25 A I think I was leaving it up to Cutler at that time.

1 Q If you were leaving it up to Mr. Cutler, then why does it say, "Catherine will go back to
2 JES"? Clearly you are the person that she thinks she needs to go to here.

3 A I don't understand why it says -- this implies that she's not comfortable or they're not
4 comfortable going to Cutler. I don't understand. He is the general counsel for the bank.

5 Q Do you think it could also mean that they are contemplating going around you to
6 Mr. Cutler if you did not agree to end J.P. Morgan's relationship with Mr. Epstein?

7 A I was all for them going to Cutler. I would not consider that going around me.

8 Q You previously testified that Mr. Cutler decided that J.P. Morgan should keep Mr.
9 Epstein as a client following his guilty plea.

10 A As a banking-only client, yes.

11 Q Can you tell us what you remember about that decision or any conversation you had
12 with Mr. Cutler at the time?

13 A No. Again, it was Cutler's decision and I left it to Steve Cutler to make the decision.

1 [4:16 p.m.]

2 BY [REDACTED]:

3 Q I'd like to introduce as minority exhibit T an internal due diligence report with an
4 embedded article on Mr. Epstein titled, "The Sex Trafficking Model Scout," dated August 4th, 2010.
5 The Bates number is EFTA02811303.

6 [Staley Minority Exhibit T.

7 was marked for identification.]

8 BY [REDACTED]:

9 Q This article describes the modeling agency MC2, which it notes that Mr. Epstein funded,
10 and allegations that Mr. Epstein and Jean-Luc Brunel, quote, "deliberately engaged in a pattern of
11 racketeering that involved luring minor children through MC2, mostly girls under the age of 17, to
12 engage in sexual play for money."

13 The article further states that, quote, "civil complaints allege that young girls from South
14 America, Europe, and the former Soviet Republic, few of whom spoke English, were recruited for
15 Mr. Epstein's sexual pleasure."

16 Do you recall having internal discussions about this article or the allegations it describes?

17 A No.

18 Q Do you recall having internal discussions about the modeling agency MC2?

19 A No.

20 Q In a deposition in a class action against J.P. Morgan, you were asked whether you
21 remembered hearing in 2010 about civil complaints that had been brought against Mr. Epstein. You
22 testified that you did remember hearing about those lawsuits and that you discussed them with
23 others at J.P. Morgan.

24 So would you like to correct your answer?

25 A But you were asking whether I was aware of this article about MC2, right?

1 Q I asked if you recalled having any internal discussions about this article or the allegations
2 that it describes.

3 A Or the allegations. Yeah, I may have had conversations about the allegations.

4 Q In your testimony in that class action, again, you said you remembered hearing about
5 these lawsuits, that you discussed them with others at J.P. Morgan. You also testified that, quote,
6 "It was terrible news and it was shocking. Obviously, he lied to me. That's what I recall."

7 When you testified that Mr. Epstein lied to you, what exactly did you believe he lied to you
8 about?

9 A In 2006 he lied that he solicited underage prostitutes.

10 Q If you knew in 2010 that Mr. Epstein had lied to you about his victims' ages and you
11 thought that it was terrible and shocking, as you said in your testimony, why did you continue to
12 push for J.P. Morgan to keep Mr. Epstein as a client?

13 A I don't believe I pushed J.P. Morgan to keep Epstein as a client.

14 And, again, I was running a completely different part of the bank. Was not involved in his
15 accounts or his business at all with the bank.

16 Q To be clear, you are saying that you do not believe that you pushed J.P. Morgan to keep
17 Mr. Epstein as a client?

18 A That's correct.

19 [Staley Exhibit U.

20 was marked for identification.]

21 BY [REDACTED]:

22 Q I would like to introduce as minority exhibit U an email chain between J.P. Morgan
23 employees, including William Langford, Phillip DeLuca, Nina Nichols, Maryanne Ryan, and Arthur
24 Middlemiss from January 7, 2011.

25 [REDACTED]. I believe the email chain starts on the last page.

1 [REDACTED]: We'll go off the record briefly to give you a minute to review it.

2 [Discussion off the record.]

3 [REDACTED]: We're back on the record.

4 BY [REDACTED]:

5 Q In the first email of the chain, Ms. Ryan sends Mr. DeLuca a summary of a rapid
6 response meeting on Mr. Epstein.

7 In the third paragraph, she says, quote, "Jeffrey is a friend of Jes S. and Catherine feels that
8 PB, along with William, should meet with him to explain the HT project and explain the bank's
9 recognition on the project and whether Epstein, if further exposed, could have a potential serious
10 impact."

11 First, we understand that Catherine refers to Ms. Keating, that William refers to William
12 Langford, J.P. Morgan's director of anti-money laundering, that PB refers to Private Bank, and that HT
13 project refers to human trafficking project.

14 So according to Ms. Ryan, Ms. Keating believed that she, along with Mr. Langford, needed to
15 meet with you to explain J.P. Morgan's human trafficking project and the impact that Mr. Epstein's
16 crimes, if further exposed, could have on the project, correct?

17 A Yes.

18 Q Would you agree that this statement makes clear that at this point in early 2011, J.P.
19 Morgan already suspected that Mr. Epstein was engaging in sex trafficking?

20 A Yes.

21 Q In the next paragraph, Ms. Ryan says, quote, "Epstein was released in July from house
22 arrest, and the Palm Beach Post carried two articles saying DOJ may be investigating for child
23 trafficking via a modeling agency he is part owner in. I think Catherine believes that after the
24 briefing on HT that Jes would need to, point-blank, ask Jeffrey the status of any criminal
25 investigations."

1 Did you ask Mr. Epstein about the status of any criminal investigations into him?

2 A I don't recall.

3 Q You have no memory of asking Mr. Epstein in early 2011 about investigations into him,
4 specifically criminal investigations for sex trafficking?

5 A Obviously, I was aware of it. He was being investigated. I don't recall if I had specific
6 conversation with him.

7 Q Ms. Ryan continues, quote, "Catherine made sure we knew that no one on today's call
8 was in favor of having retained him as a client. Seems it all is due to Jes's personal relationship.
9 Note, he has about 212 mil in the bank."

10 Would you agree that at this point J.P. Morgan's retention of Mr. Epstein as a client was due
11 to your personal relationship with him?

12 A No. No, I would not.

13 Q What was it due to?

14 A I think the bank had full authority to close his accounts and close his business. It was
15 not up to me to make a decision. I was not involved in the decision. I wasn't in the rapid response
16 team. I wasn't involved in any of this process.

17 I knew Epstein, but I think the bank and the people, from Catherine Keating on down, had the
18 authority to close the accounts and chose not to. But I think they significantly restricted his
19 activities with the bank.

20 Q You're mentioned throughout this email, though, multiple times --

21 A Again --

22 Q -- by multiple people. Clearly, you are central --

23 A -- people --

24 Q -- to this entire decision.

25 A No.

1 Mr. Sullivan. Question, answer.

2 Mr. Staley. No.

3 BY [REDACTED]:

4 Q How can you say you were not involved in it? And if you weren't involved in it, why
5 are so many people talking about how they have to talk to you about Mr. Epstein?

6 A In the meetings discussing -- discussing Epstein's accounts, was I in the meetings with all
7 these people listed?

8 Q Were you?

9 A No.

10 Q In the last full paragraph of the email, Ms. Ryan says, quote, "The one new concerning
11 thing is the one article about the DOJ investigation is saying they brought underage girls to the U.S.
12 via a modeling agency, M2, that is owned by a guy named Brunel. Turns out the banker said today
13 we extended Epstein a loan in relation to this modeling agency." We believe she means MC2.

14 Would you agree that at this point in early 2011, J.P. Morgan had reason to believe that the
15 bank had directly funded Mr. Epstein's sex trafficking operation?

16 A Again, I was not part of this -- I was not part of this area of the bank any longer, so
17 I -- you know, to ask me to tell you what the bank was thinking, it's more important you ask the bank.

18 Q At the bottom of the email, Ms. Ryan says, quote, "Bottom line, we need W to meet
19 with Jes to explain HT and then Jes could decide the next steps."

20 We understand this to mean that Mr. Langford needs to meet with you and explain human
21 trafficking, and then you can decide next steps.

22 As you have pointed out multiple times, you were the CEO of the investment banking division
23 at this time, correct?

24 A Yeah, not the Private Bank.

25 Q So you did not have authority over asset management or the Private Bank, correct?

1 A That's correct.

2 Q So then why did J.P. Morgan's director of anti-money laundering, or anyone else for that
3 matter, need to talk to you about Mr. Epstein?

4 A I think you should ask him.

5 Q Why would all of these people from different divisions at J.P. Morgan repeatedly talk
6 about how they need to go to you to talk about Mr. Epstein, to explain human trafficking, if you do
7 not have a significant role in the decision to keep Mr. Epstein as a client?

8 A And I think you need to ask them. But I did not have a significant role in the decision
9 to keep Epstein as a client.

10 Q In the next --

11 A It's a completely different -- completely different part of the bank.

12 Q I'm sorry?

13 A It was a completely different part of the bank than what I was responsible for.

14 Q I understand that. In the next email on the chain, Mr. DeLuca forwards Ms. Ryan's
15 email to Ms. Nichols, who is new on the team. He provides Ms. Nichols with some background
16 information, including that Mr. Epstein, quote "is alleged to be involved in the human trafficking of
17 young girls," and that Mr. Epstein, quote, "is also an alleged personal associate of the CEO of the
18 investment bank (Jes Staley)."

19 Do you agree that Mr. Epstein was a, quote, "personal associate" of yours?

20 A Again, as I've said, we had a professional relationship. We obviously knew each other.
21 I would not call it a personal friendship.

22 Q I asked if you would agree that Mr. Epstein was a, quote, "personal associate" of yours?

23 A What does associate mean?

24 Q However you understand that word.

25 A Again, I think it was a relationship based on the business relationship that we had. I

1 did not view him as a personal friend.

2 Q Mr. Langford then asks the individuals on the chain to pull prior emails and relevant
3 press reports, quote, "so we can get all the facts ASAP in advance of any meeting with Jes."

4 The team then exchanges emails about compiling information.

5 Did Mr. Langford and management for the Private Bank meet with you at this point?

6 A I don't recall.

7 Q You have no recollection if they met with you and shared all of the facts relevant to
8 Mr. Epstein's sex trafficking operation that they are discussing compiling in advance of a meeting
9 with you?

10 A I don't.

11 Q Finally, in the last email of the chain, Ms. Ryan explains that the renewed interest in
12 Mr. Epstein was due to alerts for cash activity and that, in talking to J.P. Morgan employees, she
13 learned that, quote, "PB was not so thrilled with retaining him. It was all due to Jes."

14 A That's not fair.

15 Q So you dispute her characterization?

16 A Yes.

17 Q I'd like to introduce as minority exhibit V, a due diligence report for one of Mr. Epstein's
18 accounts. The Bates number is EFTA02810567.

19 [Staley Minority Exhibit V.

20 was marked for identification.]

21 BY [REDACTED]:

22 Q If you're looking at the bottom of each page, on page 6 there, is an update dated
23 January 27th, 2011, that says quote, "A few news stories during 2010 connects Jeffrey Epstein to
24 human" --

25 Mr. Sullivan. I want to make sure we know what you're reading. Sorry.

1 [REDACTED]: If you look at the numbers at the bottom of the page --

2 Mr. Sullivan. Page 6.

3 [REDACTED]: Flip to page 6. A little further down than halfway down the page.

4 Mr. Sullivan. Okay. Thank you. Summary of findings?

5 BY [REDACTED]:

6 Q It says, quote, "A few news stories during 2010 connects Jeffrey Epstein to human
7 trafficking. The coverage team, along with Catherine Keating and William Langford, all met to
8 discuss the situation and agreed to enhance monitoring and document a discussion with the client.

9 Jes Staley discussed the topic with Jeffrey Epstein, who replied there was no truth to the
10 allegations, no evidence, and was not expecting any problems. We will continue to monitor the
11 accounts and usage closely going forward?"

12 Mr. Staley. Is that the same date where I said he was shaken?

13 Mr. Sullivan. No. This is 11.

14 BY [REDACTED]:

15 Q So the outcome of the meeting with Ms. Keating and Ms. Langford, which I understand
16 that you do not recall, but that they are clearly, at least Mr. Langford is emailing about, the outcome
17 of this meeting appears to be that you would simply talk to Mr. Epstein.

18 Do you remember whose idea that was?

19 A No.

20 Q Do you remember why the idea was for you to talk to Mr. Epstein and not someone in
21 risk or compliance or legal or even someone at the Private Bank?

22 A Again, by this time I think the decision was ultimately in the hands of Steve Cutler and,
23 you know, the bank is -- you know, Langford and Catherine and whatnot are doing their reviews, and
24 I was in another part of the bank, so --

25 Q If the decision was in the hands of --

1 Mr. Sullivan. Please let him finish. I'm sorry.

2 [REDACTED]. Excuse me, Mr. Sullivan?

3 Mr. Sullivan. Please let him finish.

4 Mr. Staley. So confusing the issue of me talking with Epstein about the accusations against
5 him, it's not the same thing as the decision by the bank to keep him as a banking client only. I think
6 you're pushing the two together.

7 BY [REDACTED]:

8 Q I don't think I am.

9 A Sorry.

10 Q The document says, "Jes Staley discussed the topic with Jeffrey Epstein." So whatever
11 role you say Mr. Cutler had isn't relevant to what I am asking right now.

12 I am asking why the idea was for you to talk to Mr. Epstein, as it says you did, instead of
13 someone -- even put Mr. Cutler aside -- but instead of someone in risk or compliance or at the
14 Private Bank, because, as you've pointed out multiple times --

15 A They may have.

16 Q Please don't interrupt me.

17 As you have pointed out multiple times, you were CEO of the investment banking division.
18 So why are you asking Mr. Epstein about these allegations?

19 A Because I knew Epstein, and I was asking about the allegations. But that is a separate
20 issue from the activities of the Private Bank and what they should do with Epstein.

21 Q So as they are reviewing his accounts, they're pulling you in because of your friendship
22 with Mr. Epstein and asking you to talk to Mr. Epstein about the allegations against him?

23 A Again, and also in this document, we've talked about Steve Cutler, basically, controlling
24 the decision of whether we keep Mr. Epstein as a client.

25 We also had talked -- also talked about that Epstein had, you know, relations with other

1 employees of J.P. Morgan, not just me.

2 Q I understand that. I'm not sure it answers my question.

3 Setting aside who has the authority to terminate a client relationship with Mr. Epstein --

4 A Right.

5 Q -- is it your testimony today that the reason that you are talking to Mr. Epstein about the
6 allegations against him in this context is because he was your friend, and so your colleagues at J.P.
7 Morgan who are tracking the issues with his accounts are going to you and saying, please talk to him
8 about these allegations against him.

9 I'm trying to understand why it's you who is talking to him instead of people in other more
10 relevant divisions at J.P. Morgan.

11 A We don't know -- I think he was talking to other people at J.P. Morgan.

12 Q Maybe. But that's not what the document says. The document says, "Jes Staley
13 discussed the topic with Jeffrey Epstein."

14 A You were saying, why is it you as opposed to other people at Morgan. And I'm saying, I
15 don't think it's as opposed to other people at Morgan. I think other people at Morgan had direct
16 contact with him as well.

17 Q Do you remember that, other people at J.P. Morgan going to Mr. Epstein and asking him
18 about these allegations?

19 A Yes.

20 Q Who?

21 A Mary Erdoes.

22 Q Anyone else?

23 A I believe Justin Nelson. And then Steve Cutler, I think, had conversations with Epstein's
24 lawyers. I'm not sure whether other lawyers were involved.

25 Q If these other people were talking to Mr. Epstein about the allegations against him, why

1 do you think they are not mentioned in documents with the frequency that you are?

2 A Again, I didn't write the documents.

3 Q Do you remember talking to Mr. Epstein about the allegations against him, the
4 conversation that's referenced here?

5 A I remember the one conversation I had with him when I said he was very shaken, and I
6 think that was before this. But I don't know how the dates line up.

7 Q Well, this update is from January of 2011. So, presumably, it would have been in that
8 month or close to it.

9 A And the date on my saying he was shaken was what?

10 Q I believe that was 2006.

11 A So long before. Okay.

12 Q So you have no recollection of the conversation that this document indicates you had
13 with Mr. Epstein in 2011 about the allegations against him?

14 A No, I don't.

15 Q And you have no recollection of whose idea it was to have you have this conversation
16 with Mr. Epstein?

17 A Again, I was in a completely different part of the bank. I don't.

18 Q Do you think that it made sense to ask a potential sex trafficker if he was engaging in sex
19 trafficking?

20 A Ask the question again.

21 Q Do you think it made sense to ask a potential sex trafficker if he was engaging in sex
22 trafficking as a form of due diligence?

23 A Makes sense.

24 Q You testified that by 2010 you knew Mr. Epstein had lied to you.

25 A Yes.

1 Q So if you knew he had lied to you in 2010, why would it make sense to go to him in 2011
2 and ask him if he was engaging in sex trafficking?

3 A Again, the issue was 2006, we learned what he did. He pled guilty. He went to jail.
4 He served his time.

5 It was inconceivable to me that he would continue in his sex trafficking after spending a year
6 in jail, year on work release. It just -- you know, it didn't make sense to me.

7 Q So even though you knew he lied to you, you --

8 A In 2006.

9 Q In 2006, yeah, right. You learned in 2010 that he lied to you in 2006.

10 Even then you thought that it was inconceivable that he might lie to you again, and so having
11 you go to him and ask him if he is engaging in sex trafficking is an adequate form of due diligence?

12 A An adequate form of due diligence would be the Private Bank engaging with him and
13 doing its due diligence. That's the proper form of due diligence.

14 [Staley Minority Exhibit W.

15 was marked for identification.]

16 BY [REDACTED]:

17 Q I would like to introduce as minority exhibit W an email exchange between you and
18 Mr. Epstein dated March 20th, 2011. The Bates number is EFTA00906898.

19 In the first email, Mr. Epstein writes, quote, "I'm working on getting Steve Cutler the comfort
20 he needs," to which you respond, quote, "Agree?"

21 Was Mr. Cutler concerned about something related to Mr. Epstein?

22 A I think Steve Cutler had the ultimate decision as to whether we keep Epstein as a client.

23 Also, I think around this time Epstein had hired a legal team, and I think that legal team was
24 being set up to meet with Steve Cutler.

25 Q Is that what Mr. Epstein was doing to get Mr. Cutler the, quote, "comfort that he

1 needs"?

2 A I think so.

3 [Staley Minority Exhibit X.

4 was marked for identification.]

5 BY [REDACTED]:

6 Q I would like to introduce as minority exhibit X an email chain with you, Mr. Cutler, Ms.
7 Erdoes, James Condren, and Nina Shenker dated July 19th, 2011, a few months after Mr. Epstein told
8 you that he was working to get Mr. Cutler the comfort he needed.

9 BY [REDACTED]:

10 Q In the most recent email, so at the top of the page, Mr. Cutler writes of Mr. Epstein,
11 quote, "This is not an honorable person in any way. He should not be a client."

12 So you have said multiple times today that Mr. Cutler had the authority to terminate a client
13 relationship, correct?

14 A Yes.

15 Q If Mr. Cutler had that authority, why didn't he use it?

16 A I don't know.

17 Q Did you exert influence over Mr. Cutler to keep Mr. Epstein as a client?

18 A No.

19 Q You left J.P. Morgan in early 2013, correct?

20 A Correct.

21 Q And then J.P. Morgan terminated its relationship with Mr. Epstein in the summer and
22 fall of that year, correct?

23 A Yes.

24 Q Why do you think that J.P. Morgan only removed Mr. Epstein as a client once you left
25 the bank?

1 A I don't know.

2 Q You don't think those two things are connected?

3 A No.

4 Q Would you agree that Mr. Epstein had a vast network of people he was connected to in
5 industries, including finance, politics, entertainment, and academia?

6 A Yes.

7 Q Would you agree that Mr. Epstein frequently leveraged those connections to broker
8 meetings, share business intelligence, and trade favors?

9 A I'm not sure I'd say trade favors.

10 Q Sure. Would you agree that Mr. Epstein frequently leveraged these connections to
11 broker meetings and share business -- excuse me -- share business intelligence?

12 A I think he brokered meetings with his network because of what he knew and his
13 influence.

14 Q And he shared business intelligence; would you agree with that?

15 A I'm not quite sure what you mean by business intelligence. But, you know, views
16 about business or whatnot, yes.

17 But if the implication is that he was using it to pass on nonpublic information, no.

18 Q You don't think he passed on nonpublic information?

19 A Not that I'm aware of.

20 Q Would you agree that Mr. Epstein used his vast network of people and the connections
21 that he had to stay not just relevant but powerful despite being a -- excuse me -- despite being a
22 convicted sex offender?

23 A I think he kept a network that gave him a certain aura. I'm not sure I'd characterize it
24 as power. I don't think he had power over anybody.

25 Q Your attorney argued before the financial conduct authority that, quote, "Mr. Epstein

1 traded and influenced and relied on his network for his legitimacy."

2 Would you agree with that statement?

3 A Yes.

4 Q Did you ever share confidential information about J.P. Morgan with Mr. Epstein?

5 A Yes.

6 Q Did you ever share other confidential information with Mr. Epstein, so not necessarily
7 related to J.P. Morgan?

8 A No.

9 Q And you said previously you are not aware of Mr. Epstein sharing or trading on
10 information generally?

11 A That's correct.

12 Q So, presumably, you're not aware of Mr. Epstein sharing or trading on information that
13 you gave him?

14 A Correct.

15 [Staley Minority Exhibit Y.

16 was marked for identification.]

17 BY [REDACTED]:

18 Q I would like to introduce as minority exhibit Y an email exchange between you and
19 Mr. Epstein dated August 21st, 2008, and an email that you sent Mr. Epstein dated June 20th, 2009.
20 The Bates number for the 2008 email exchange is EFTA01299999, and the Bates number for the 2009
21 email is EFTA01256074.

22 In the email exchange from 2008, you write to Mr. Epstein, quote, "I'm trying to do two deals
23 at the same time. Buy Dimensional and sell American Century."

24 Does this refer to Dimensional Fund Advisors and American Century Companies?

25 A Yes.

1 Q What were these deals?

2 A We were talking with the owner of Dimensional about potentially buying the firm and
3 merging it, and potentially, I think I was selling American Century to fund it or to merge with
4 American Century.

5 Q And J.P. Morgan was involved in a mediation with American Century Companies,
6 correct?

7 A We owned -- at one point we owned American Century Company.

8 Q And there was a mediation later, correct?

9 A There may have been, yes.

10 Q Did you typically tell Mr. Epstein about ongoing negotiations and mediations before they
11 were public?

12 A This was a transaction that involved me and the business that I was overseeing. As I've
13 said, I went to him for advice and his views, but completely trusted that he would not use this
14 information for personal gain.

15 Q In the email from 2009, you write to Mr. Epstein, quote, "We settled with Am Century.
16 Details tomorrow." And then you say, quote, "Thanks for your counsel."

17 A Yes.

18 Q So what was that counsel?

19 A I'm not specifically -- I don't specifically recall what his counsel was, but there was -- this
20 implies that it was involved, should we separate from American Century, how should we do it, et
21 cetera.

22 And like you would a consultant or an investment banker, I was looking for counsel from
23 Jeffrey Epstein.

24 Q But he wasn't a consultant, was he?

25 A I think he advised a lot of people in business in different -- in different spheres.

1 Q Did you pay him as a consultant?

2 A No, I did not.

3 Q Did J.P. Morgan pay him as a consultant?

4 A No, they did not.

5 Q I would like to introduce as minority exhibit Z an email between you and Mr. Epstein
6 dated September 26th, 2008. The Bates number is EFTA01300035.

7 [Staley Minority Exhibit Z.

8 was marked for identification.]

9 BY [REDACTED]:

10 Q In this email, you write, quote, "I'm spending a lot of time with Treasury. The Private
11 Bank has brought in \$44 billion in the last 2 weeks. Unreal."

12 Why did you tell Mr. Epstein that you were spending a lot of time with Treasury?

13 A This was during the financial crisis of 2008. Obviously, a lot was going on financially,
14 globally, and around the world. I was working with the U.S. Treasury in my capacity at J.P. Morgan.

15 And again, I would use Epstein as -- to get his advice and thoughts on issues like this that I was
16 facing.

17 Q Would you agree the information about how much money J.P. Morgan's Private Bank
18 brought in over the course of 2 weeks is confidential?

19 A I don't believe -- I think I could share it with someone that I was seeking advice from.

20 Q Even if that person was not retained by J.P. Morgan in any capacity?

21 A Again, I think I did -- was using him as a source of advice and views on the markets
22 and -- but not -- this was a very stressful time. So I was not paying him, but I was using him as an
23 adviser at that time.

24 Q In the next paragraph, you write, quote, "Also, do you know Sheldon Adelson. I am
25 throwing him out of the bank on Monday." You spelled it t-h-r-o-u-g-h-i-n-g. Did you mean

1 t-h-r-o-w-i-n-g?

2 A We exited Sheldon Adelson as a client.

3 Q You're not asking Mr. Epstein for advice here, though; you're just sharing information?

4 A No. I'm asking him whether he knows Sheldon Adelson, and I don't know whether
5 there were follow-up questions or not.

6 Q So your testimony here is not that you are just sharing an extremely confidential piece
7 of information with Mr. Epstein, but even though you don't ask him for any -- you don't ask him for
8 any advice or counsel --

9 A I asked him whether he knows Sheldon Adelson.

10 Q And you read that as looking for Mr. Epstein's advice or counsel on a decision that
11 you've already made?

12 A Potentially.

13 Q Why would you need his advice or counsel on a decision you had already made?

14 A I don't need it, but I might want it.

15 Q On a decision you had already made?

16 A Yeah.

17 Q Would you agree that information about a client's status at a bank is confidential?

18 A Yeah, confidential. But I believe, as a senior officer of the bank, I've got the right to use
19 confidential information where I think it's appropriate.

20 Q I would like to introduce as minority exhibit AA an email chain between you and
21 Mr. Epstein dated October 8th, 2008.

22 [Staley Minority Exhibit AA.

23 was marked for identification.]

24 BY [REDACTED]:

25 Q In the first email of the chain, you write, quote, "I just gave an idea to the Fed and Jamie

1 that might help the financial markets in a big way. Both thought is brilliant."

2 You're referring to the Federal Reserve here, correct?

3 A Yes, I am.

4 Q Why did you share information about your conversations with the Federal Reserve and
5 J.P. Morgan's CEO with Mr. Epstein?

6 A Again, this was a very, very stressful time in the market. I was using Epstein's
7 knowledge and judgment, and so I was sharing information with him as we were trying to navigate
8 these very difficult times.

9 Q Mr. Epstein responds with some thoughts about financial markets. And then you
10 reply, quote, "I am dealing with the Fed on an idea to solve things. I need a smart friend to help me
11 think through this stuff. Can I get you out for a weekend to help me? (Are they listening?)"

12 Was this the same brilliant idea that you referred to earlier?

13 A I believe it was the same idea that I referred to earlier.

14 Q Mr. Epstein was incarcerated at this point, correct?

15 A Yes.

16 Q When you wrote, quote, "get you out for a weekend," you meant out of the Palm Beach
17 County Stockade, correct?

18 A Yes.

19 Q And when you wrote, quote, "Are they listening," you were asking whether
20 Mr. Epstein's emails were being monitored, correct?

21 A It seems that way, yes.

22 Q Did it strike you as problematic to be asking a convicted sex offender if you could get
23 him out for a weekend so that you could share an idea you gave to the Federal Reserve and J.P.
24 Morgan's CEO?

25 A Again, I -- Epstein had very interesting insights into the financial markets. It was a very

1 difficult time in those markets, and I thought that I could benefit from getting his thoughts with
2 respect to what I was thinking of doing with the Fed.

3 Q I would like to introduce as minority Exhibit AB, an email from Brian Sankey to you,
4 copying Hani Deaibes, dated November 28th, 2009. You forward this email to Mr. Epstein the next
5 day saying, quote, "Please use with discretion. The Bates number is EFTA02410534.

6 [Staley Minority Exhibit AB.

7 was marked for identification.]

8 BY [REDACTED]:

9 Q Mr. Sankey and Mr. Deaibes were executives at J.P. Morgan, correct?

10 A Let me read the email.

11 Q If you need more time to review, we can pause and go off the record.

12 A Yes, please.

13 [REDACTED]: We'll go off the record.

14 [Discussion off the record.]

15 [REDACTED]: We're back on the record.

16 BY [REDACTED]:

17 Q I'll repeat my earlier question. Mr. Sankey and Mr. Deaibes were executives at J.P.
18 Morgan, correct?

19 A Yes.

20 Q What was Mr. Sankey's role in 2009?

21 A I don't know.

22 Q What was Mr. Deaibes' role in 2009?

23 A I don't remember.

24 Q In the email, Mr. Sankey notes he is responding to, quote, "your question," and then
25 shares information about discussions with government officials in the United Arab Emirates,

1 including one who, quote, "reports directly to the Crown Prince."

2 Do you remember what this email was about?

3 A No.

4 Q Did you ask Mr. Sankey for this information so that you could share it with Mr. Epstein?

5 A No.

6 Q You don't remember this email, but you do remember that you didn't ask Mr. Sankey for
7 this information so that you could share it with Mr. Epstein?

8 A I don't think I would ask for information so that I could share that information with
9 Epstein.

10 Q It does appear, though, that you expected Mr. Epstein to use this information given that
11 you said, quote, "Please use with discretion."

12 A As I said, I used Epstein as an adviser. It's possible that I shared this to get Epstein's
13 thoughts as to what I should do.

14 Q Do you have any recollection of why Mr. Epstein would have been interested in this
15 information?

16 A He was very involved with the Middle East and very involved with Dubai.

17 Q Do you have any recollection of how you expected Mr. Epstein to use this information?

18 A Again, I expected him to give me his counsel as to how I might deal with Dubai with
19 respect to this information.

20 [Staley Minority Exhibit AC.

21 was marked for identification.]

22 BY [REDACTED]:

23 Q I'd like to introduce as minority exhibit AC, an email from you to Mr. Epstein on July
24 20th, 2015. The Bates number is EFTA00850787.

25 In the email you say, quote, "The CEO wants to meet." And Mr. Epstein responds, quote,

1 "I'm home."

2 You were pursuing the role of CEO at Barclays at this point, correct, in July of 2015?

3 A Yes.

4 Q And you kept Mr. Epstein up to date on all the steps of that process, correct?

5 A Correct.

6 Q By October 2015, there were discussions underway about the need for your employer at
7 the time, Blue Mountain Capital, to refrain from trading in Barclays shares, correct?

8 A Correct.

9 Q And this was because the information about you going to Barclays was, as you admitted
10 before the Financial Conduct Authority, quote, "reasonably market sensitive," correct?

11 A Correct.

12 Q So why did you share this market sensitive information with Mr. Epstein?

13 A Obviously, it was a major step in my personal career, and I use him as an adviser in that
14 capacity. So I was sharing my discussions with Barclays with him to get his counsel.

15 Q Do you regret sharing all of this information with Mr. Epstein?

16 A No.

17 Q Would you agree that you played a significant role in helping Mr. Epstein maintain
18 legitimacy after his conviction?

19 A I think he had a very broad network with dozens and dozens of people that he used to
20 try to maintain his legitimacy.

21 Q But you were a part of that network, weren't you?

22 A But I was a part of that network.

23 Q So you dispute that you played a significant role in helping him maintain that legitimacy
24 after his conviction?

25 A Again, I was a part of that network. I'm not sure I would characterize it as significant.

1 There were a lot of very influential people involved in his network.

2 Q Understood.

3 BY [REDACTED]:

4 Q Mr. Staley, we spoke earlier about you visiting Mr. Epstein in his office at the Florida
5 Science Foundation when he was on work release.

6 A Right.

7 Q Yes. Did you ever visit Mr. Epstein at the Palm Beach Stockade?

8 A No, I did not.

9 Q And as you know, Mr. Epstein was on house arrest for a year following his incarceration.
10 This was from roughly July 2009 through July 2010. And this required him to stay in Palm Beach.

11 Did you ever visit Mr. Epstein --

12 A Wasn't the house arrest -- it was out of Palm Beach, but then he moved that house
13 arrest to New York?

14 Q So that was going to be part of our question for you.

15 A Sorry.

16 Q Did you ever visit Mr. Epstein in Palm Beach while he was on house arrest?

17 A No.

18 Q Did you ever visit him anywhere else while he was on house arrest?

19 A In New York and in the -- that one facility where the sheriff was there, and then New
20 York.

21 Q In the Florida Science Foundation office?

22 A Yes.

23 Q And then in New York. Where in New York?

24 A His town house.

25 Q Okay. I would like to introduce as minority Exhibit AD -- this is an email that you sent

1 to Mr. Epstein on October 4th, 2009. The Bates number is EFTA1300356.

2 [Staley Minority Exhibit AD.

3 was marked for identification.]

4 BY [REDACTED]:

5 Q In the email you write, quote, "I realize the danger in sending this email, but it was great
6 to be able today to give you in New York City a long heartfelt hug. To my friend. Thanks, Jes."

7 When you wrote, quote, "I realize the danger in sending this email, what did you mean by
8 that?

9 A Again, maintaining a relationship with a convicted felon was a dangerous thing to do.
10 And, in hindsight, I regret it.

11 Q So you weren't referring at all to him violating his house arrest --

12 A No.

13 Q -- by being in New York?

14 A No. I think his -- he was in New York under house arrest.

15 Q Were you ever aware of him violating the terms of his house arrest?

16 A No, I was not.

17 Q Okay. Thank you.

18 BY [REDACTED]:

19 Q I have a few questions for you about visits to Mr. Epstein's properties and a few
20 clarifications.

21 You said earlier that you never went to Mr. Epstein's Palm Beach home, correct?

22 A Correct.

23 Q You also said earlier that you went to Mr. Epstein's ranch in New Mexico once, correct?

24 A Correct.

25 Q Did you spend the night?

1 A No.

2 Q So you were in Albuquerque for, I think you said, a business meeting, correct?

3 A Yes.

4 Q And then did you drive to the ranch?

5 A I had a driver drive me there.

6 Q And I think you said it was about an hour?

7 A I think so.

8 Q So you had someone drive you to the ranch. That's about an hour. And then you
9 said you went horseback riding, took a shower, and then went in the hot tub.

10 And then you had someone drive you back somewhere else that evening?

11 A The same driver drove me to the airport, and I flew home.

12 Q How many hours would you say you spent at Zorro Ranch?

13 A An hour. Maybe an hour, hour and a half.

14 Q So it was an hour of travel time each way and an hour to an hour and a half at the
15 ranch?

16 A Right.

17 Q That's a lot of travel time for very little time spent at the ranch.

18 A For a whole day? No. An hour -- again, it was described to me as the largest ranch in
19 New Mexico. I had the time. Didn't seem that special.

20 Q I would like to introduce as minority exhibit AE an email between Lesley Groff and
21 Mr. Epstein from October 30th, 2009. The Bates number is EFTA02434380.

22 [Staley Minority Exhibit AE.

23 was marked for identification.]

24 BY [REDACTED]:

25 Q In the email Ms. Groff writes, quote, "Jeffrey just wanted you to know that Jes is all set

1 and organized to stay at the ranch tomorrow night."

2 Is your testimony still that you did not spend the night at Zorro Ranch?

3 A Yes.

4 Q Why do you think Ms. Groff was under the impression that you were going to spend the
5 night?

6 A I don't know.

7 Q I would like to introduce as minority exhibit AF an email chain between you and
8 Mr. Epstein from October 18th and 19th, 2009. The Bates number is EFTA01300295.

9 [Staley Minority Exhibit AF.

10 was marked for identification.]

11 BY [REDACTED]:

12 Q In the first email, Mr. Epstein writes, quote, "London when?"

13 And you respond, quote, "Could I swing by your house in London on the afternoon of the
14 27th?"

15 A Yes.

16 Q Did Mr. Epstein have a house in London?

17 A Yes.

18 Q Where was it?

19 A I don't remember.

20 Q You have no recollection -- you spend a lot of time in London, correct?

21 A Yes.

22 Q But you have no recollection where his house in London was?

23 A I never went to his house, but I think it may have been on Mayfair, but I don't really
24 know.

25 Q Do you remember if it was a stand-alone house or a town house or an apartment?

1 A No. This says it's a house, but I don't know.

2 Q Are you aware that Mr. Epstein had at least four flats in Kensington and Chelsea that he
3 used to house women that he trafficked?

4 A No.

5 Q Could you have been referring to those flats here?

6 A I was referring to his house in London, so --

7 Q Why would you have wanted to swing by?

8 A Because, again, I thought it -- it was one of the larger houses in London, and it would be
9 interesting to see.

10 Q In all the years that you were friends with Mr. Epstein and all the time that you spent in
11 London, you never went to this house?

12 A No. Because when I was -- no.

13 [REDACTED]. We're going to go off the record.

14 [Discussion off the record.]

15 Mr. Ashworth. We'll go back on the record. The majority does not have any further
16 questions at this time. I understand the minority has a handful more questions that they're going to
17 go through, and then we'll be finished up -- thank you.

18 We'll go off the record.

19 [Discussion off the record.]

20 [REDACTED]. We're back on the record.

21 BY [REDACTED]:

22 Q I'd like to ask you some questions about Mr. Epstein's island, Little Saint James.
23 You've said today that you went twice, once in 2005 and once in 2015, correct?

24 A And that I transited through it a third time.

25 Q And what year was that?

1 A I don't recall.

2 [Staley Minority Exhibit AG.

3 was marked for identification.]

4 BY [REDACTED]:

5 Q Okay. I would like to introduce as minority exhibit AG four flight manifests from
6 February 2005. These manifests indicate that you, your wife, and your two daughters flew from JFK
7 to the Virgin Islands on Mr. Epstein's private plane on February 18th, 2005.

8 You were joined by Mr. Epstein, Ghislaine Maxwell, and three young women who worked for
9 Mr. Epstein, among others. These manifests also indicate that you, your wife, and your two
10 daughters flew from the Virgin Islands to Palm Beach on Mr. Epstein's private plane on February 21st,
11 2005, and that the same three young women who worked for Mr. Epstein accompanied you.

12 Finally, there is a manifest showing you, your wife, and your two daughters flying from Palm
13 Beach to Teterboro, New Jersey, on Mr. Epstein's private plane on February 22nd, 2005.

14 We'll go off the record briefly to give you time to review these manifests.

15 [REDACTED]: We're back on the record.

16 BY [REDACTED]:

17 Q If you, your wife, and your daughters flew to the Virgin Islands on February 18th and
18 then did not fly back until February 21st, did you stay on Mr. Epstein's island between the 18th and
19 the 21st?

20 A Apologize. I don't see the name of my family, nor myself on the passenger manifest.

21 Q Sure. The manifests are confusing. If you look at the first page, you'll see the date of
22 the flight is February 18th, the trip number is 322.

23 A Right.

24 Q You can see Mr. Epstein is the first passenger. He's listed as number one.

25 A Yes.

1 Q If you go down to --

2 Mr. Sullivan. Where? Okay.

3 BY [REDACTED]:

4 Q Number 12, it says Jeff.

5 A Yep.

6 Q It then says female guest, female, female.

7 A Yep.

8 Q If you flip to the next page, about halfway down the page, not quite, it says February
9 18th, 2005, Flight 322, James Staley, Mrs. Staley, [REDACTED], [REDACTED].

10 A Okay.

1 [5:16 p.m.]

2 BY [REDACTED]:

3 Q So what we believe, because these are the same flights on the same date, is that Jeff is a
4 typo, that it shouldn't say Jeff.

5 A Right.

6 Q And that the three female guests are your family members.

7 A Okay.

8 Q So did you and your family stay on Mr. Epstein's island between February 18th and
9 February 21st?

10 A As I said, my wife and my family visited Epstein, and this sort of confirms that.

11 Q So you stayed on his island --

12 A On his island, yes, along with --

13 Q -- from the night of the 18th through the 21st?

14 A -- along with the Dubins, yes.

15 Q That's different from what you had testified to previously, correct?

16 A No. Why? How so?

17 Q I believe you told the Financial Conduct Authority that you spent a single night on Mr.
18 Epstein's island with your wife.

19 A I thought it was a single night. But this implies it was two nights or three nights.

20 Q You did testify before the Financial Conduct Authority that you recall -- this is according
21 to their decision -- that you recall visiting Mr. Epstein's island with your wife and spending the night
22 there in 2005 or 2006. So it appears it was your whole family, and it was more than one night,
23 correct?

24 A It appears that way, yes.

25 Q It also appears that the three young women who worked for Mr. Epstein also stayed on

1 the island with you because they are on the flight there on the 18th and then they're on the flight
2 back on February 21st?

3 A Yeah, I wouldn't characterize Sarah Kellen as a young woman. I recognize [REDACTED] I
4 don't know who [REDACTED] is.

5 Q Did you and your family socialize with these women?

6 A No.

7 Q Did you engage in sexual activity with these women?

8 A No.

9 Q Other than the people listed on the manifest in the first page of this exhibit, was anyone
10 else on the island?

11 A I don't even know whether all these people were on the island. I just remember my
12 wife, my family, and the Dubins were on the island.

13 Q And do you remember anyone else on the island who wasn't necessarily on the flight to
14 the island?

15 A No. Except for people that worked on the island.

16 Q The manifests show that you fly from the Virgin Islands to Palm Beach on February 21st,
17 and then from Palm Beach to Teterboro, New Jersey, on February 22nd. So it appears that you also
18 spent a night in Palm Beach. Is that correct?

19 A That's what this appears to show. I don't recall that, but that's what this appears to
20 show.

21 Q Do you remember where you stayed when you spent the night in Palm Beach?

22 A No.

23 Q Would you have stayed at Mr. Epstein's home in Palm Beach?

24 A No.

25 Q You're confident that you would not have stayed at his home?

1 A Very confident.

2 Q Why is that?

3 A If I was traveling with my whole family, I wouldn't stay at someone's house like that.

4 [Staley Minority Exhibit AH.

5 was marked for identification.]

6 BY [REDACTED]:

7 Q I'd like to introduce as minority exhibit AH two emails from you to Mr. Epstein on
8 January 15th, 2010. The Bates numbers are EFTA01300416 and EFTA01821546.

9 In the first email you say, quote: "Arrived at your harbor. Someday, we have to do this
10 together." In the second email you say, quote: "That was cool." And Mr. Epstein responds:
11 "Yup. Great seeing you." And, again, both of these are from the same day.

12 Was this another trip to Mr. Epstein's island?

13 A No. I believe this was me arriving on my boat to -- he owned a marina in St. Thomas,
14 and I believe I was talking about me sailing -- I believe when I say his harbor, I believe it was to the
15 marina.

16 Q In the second email, which, again, is from January 15th, you say: "That was cool."

17 A Uh-huh.

18 Q Do you know what you're referring to?

19 A No.

20 Q If you were just arriving at Mr. Epstein's marina, would you have seen him?

21 A Possibly. He may have come over and looked at my boat.

22 Q So when he said, "Yup. Great seeing you," it's possible that he was at the marina?

23 A It's possible, yes.

24 Q Is it also possible that this was an instance in which you visited Little Saint James?

25 A I don't think so, because it says: "Arrived at your harbor." And, again, I think the

1 harbor refers to the harbor in St. Thomas where he owns a marina, but I'm not sure.

2 [Staley Minority Exhibits AI and AJ.

3 were marked for identification.]

4 BY [REDACTED]:

5 Q I'd like to introduce as minority exhibit AI an email exchange between you and Mr.
6 Epstein dated December 27th, 2010. The Bates number is EFTA00648887.

7 I would also like to introduce as minority exhibit AJ an email exchange between you and Mr.
8 Epstein dated January 22nd, 2011. The Bates number is EFTA01300907.

9 In the first exchange, you tell Mr. Epstein that you, quote: "Scheduled a dinner on Little
10 Saint Jeff's on Jan 21st." In the second exchange you tell Mr. Epstein that his island is a "paradise."

11 A I've lost you.

12 Q In the first exchange, which is from December 22nd, 2010 --

13 A No, this is December 27th.

14 Mr. Sullivan. What did she say.

15 BY [REDACTED]:

16 Q Oh, my apologies. I misspoke. December 27th, 2010.

17 In the first exchange, from December 27th, 2010, you tell Mr. Epstein that you, quote:
18 "Scheduled a dinner on Little Saint Jeff's on Jan 21st." It's the second line of your email.

19 A Yep.

20 Q In the second exchange --

21 A Wait, wait, wait, wait.

22 Okay.

23 Q In the second exchange you tell Mr. Epstein that his island is a "paradise."

24 A Yep.

25 Q Did you go back to Mr. Epstein's island in January of 2011?

1 A Again, I think I said that I was in transit on my boat.

2 Q Well, in your first email you say, quote: "Scheduled a dinner on Little Saint Jeff's on
3 January 21st." So it looks like at the very least you had dinner on Little Saint Jeff's.

4 A I don't know. This is an email from December, so a full month before.

5 Q Right. And then the second --

6 A So I don't know whether I had dinner. And on this next email, just talks about visiting
7 his island, not about having dinner on his island. So I don't think --

8 Q It's from the day after you had apparently scheduled a dinner.

9 A I scheduled a dinner a month before. I was on my boat. I have no idea whether I had
10 dinner on my boat or off my boat.

11 Q I will represent to you that Mr. Epstein's birthday is January 20th.

12 [Inaudible.]

13 [REDACTED]. That's because one is from December and one is from January.

14 The Reporter. I'm sorry, I didn't hear you.

15 Ms. Harris. That's okay. I was just querying the date.

16 BY [REDACTED]:

17 Q I'll represent to you that Mr. Epstein's birthday was January 20th. So it looks like you
18 are sending him an email on December 27th, 2010, saying that you scheduled a dinner on Little Saint
19 Jeff's on January 21st, which would be the day after his birthday. And then, about a month later, on
20 January 22nd of 2011, you refer to his island being a "paradise."

21 A Yes.

22 Q So taken together, these look like you scheduled the dinner on his island for his
23 birthday, had that dinner, and then sent an email the day after saying: "What a paradise."

24 A But there's nothing in the second email that talks about a dinner for his birthday the
25 previous night. And you would think, if that had happened, that I would have mentioned that,

1 "Great to see you" or something like that, and there's nothing there.

2 Q So you don't think that you visited his island again in January of 2011?

3 A Again, my recollection is there were three times that I was on his island. But I was
4 staying on my boat. So it's possible.

5 Q In the second exchange you say: "I think Larry is sad." Is it possible that you were
6 referring to Larry Summers here who was also part of the birthday dinner?

7 A Which birthday dinner again are you talking about?

8 Q Who was also part of the dinner that you scheduled on Little Saint Jeff's on January
9 21st?

10 A But Epstein is emailing me on the 22nd saying, "Do you like the kitchen?" as if I wasn't
11 with him on the 21st. The way you're trying to tie it together doesn't make sense in I how read it.

12 Q So you do not believe that you visited Mr. Epstein's island in January of 2011?

13 A Again, I believe that I was on my boat, and I may have stopped by his island on the 11th.
14 But I don't remember it.

15 Q You may have stopped by his island in January of 2011 and potentially had dinner?

16 A I think if I had had dinner on his island I would have mentioned this, and I don't.

17 [Staley Minority Exhibit AK.

18 was marked for identification.]

19 BY [REDACTED]:

20 Q I would like to introduce as minority exhibit AK a manifest for a flight from New Jersey
21 Teterboro Airport to St. Thomas on April 11th, 2015.

22 The manifest lists you, your wife, Jeffrey Epstein, and two additional women,

23 [REDACTED] and another woman whose name we will not read because it is not public, as
24 passengers.

25 I'll give you a minute to look it over.

1 A Okay.

2 Q It appears this manifest is referring to your visit to Mr. Epstein's island in April of 2015,
3 correct?

4 A I'm not sure -- no. I don't think I visited his island. I think we were on the boat. So
5 we may have caught a ride with him at St. Thomas but went to our boat.

6 Q Other than the people listed as passengers on the plane, was there anyone else with
7 you?

8 A The crew.

9 Q You previously said earlier today that you didn't believe that you had ever met [REDACTED]
10 [REDACTED]

11 A That's correct.

12 Q And this shows that you were on a plane with her, correct?

13 A Correct.

14 Q Do you remember being on a plane with her?

15 A No, I don't.

16 Q And so your recollection is that you were on a boat, but you didn't actually visit his
17 island. Is that correct?

18 A That's correct.

19 [Staley Minority Exhibit AL.

20 was marked for identification.]

21 BY [REDACTED]:

22 Q I would like to introduce as minority exhibit AL an email from you to Mr. Epstein dated
23 April 12th, 2015, which is the following day. The Bates number is EFTA01746275.

24 In the email you say, quote: "Thanks for the flight and thanks for lunch. Your place is crazy
25 and special. It has a warmth and silliness that makes it yours. I count you as a deep friend. The

1 girls seemed to enjoy the sail."

2 So you flew on his private plane, you had lunch, but then you say: "Your place is crazy and
3 special. It has a warmth and silliness that makes it yours." That suggests that you did also visit the
4 island. Agree?

5 A I said thanks for lunch, yes.

6 Q Sure. But then you say, quote: "Your place is crazy and special. It has a warmth
7 and silliness that makes it yours."

8 A That's the same to me as "thanks for lunch."

9 Q Where would you have had lunch?

10 A On his island it seems like.

11 Q Okay. So to clarify, you flew on his plane on April 11th, 2015, and then you had lunch
12 on the island that day?

13 A It seems like.

14 Q When you say, quote, "The girls seemed to enjoy the sail," who are the girls?

15 A I don't know. I don't recall.

16 Q Your daughters were not with you at this point, correct?

17 A I believe this flight was just my wife and myself, correct.

18 Q So were "the girls" either girls or young women that worked for Mr. Epstein?

19 A I don't recall.

20 Q You have no recollection of going sailing with girls?

21 A No.

22 Q So to summarize, you visited Mr. Epstein's island in February of 2005. And in April
23 of 2015 -- in 2005 it was with your family, and in 2015 it was with your wife, correct?

24 A In 2005 we stayed on the island. In 2015 I think we were staying on our boat.

25 Q And in January of 2010 you may have seen him at the marina in the Virgin Islands in St.

1 Thomas?

2 A I think he may have come by and seen my boat.

3 Q And your recollection is that you did not also visit in January of 2011?

4 A That's my recollection.

5 Q You also flew on Mr. Epstein's plane multiple times. The times that we have discussed
6 are three instances in February of 2005 and then once in April of 2015, correct?

7 A I don't recall.

8 Q Do you remember any other times that you flew on Mr. Epstein's plane?

9 A I remember flying on a 727, and I remember flying on his Gulfstream. But I don't -- no.
10 It either would have been between here and Florida or here and St. Thomas -- or New York, sorry.

11 Q Mr. Staley, I am concerned that you have not been entirely honest with us today, in
12 large part because you have a history of saying what you think you need to to get what you want. I
13 want to ask you about that history and see if you have explanations for us.

14 Back in the fall of 2019, the president and trustees of Bowdoin College, your alma mater,
15 became concerned about your association with Mr. Epstein, correct?

16 A Correct.

17 Q And you were a trustee at Bowdoin College, correct?

18 A Correct.

19 Q And you wanted to remain a trustee of Bowdoin College, correct?

20 A Correct.

21 Q In response, you gave a presentation to the Bowdoin College trustees about your
22 relationship with Mr. Epstein, correct?

23 A Correct.

24 Q And as part of that presentation, you made a number of statements to the
25 Bowdoin College trustees, correct?

1 A Correct.

2 Q And this was before the Department of Justice released some of its files on Mr. Epstein,
3 correct?

4 A Correct.

5 Q One of those statements was: "I had limited contact with him post his conviction."
6 We know that between 2008 and 2012 you exchanged over 1,200 emails with Mr. Epstein.
7 That is nearly 300 emails a year or almost an email a day. How is that "limited contact"?

8 A Again, I have used the word "contact" as being with him, having contact with somebody,
9 not necessarily an email.

10 Q Do you think that that's how the word was understood when you said it to the Bowdoin
11 College trustees, that "contact" meant physical contact?

12 A I can't speak for the Bowdoin trustees, but I think that's what I was referring to.

13 Q Another statement was, quote --

14 A I'm sorry, I don't know -- when you say that number of emails, is it like separate emails,
15 or is it like a chain where you say, "Hi," I say, "Hi." You say, "What are you doing?" I say, "Nothing.
16 What are you doing?" Like is it --

17 Q It's a finding from the Financial Conduct Authority.

18 A But we don't know whether it's -- okay.

19 Q Individual emails or emails chains? No. I think it's still a pretty high number.

20 Another statement was, quote: "At no time after his conviction in 2008 did I allow J.E. any
21 connection with any respect of my professional life. Indeed, I have never had any professional
22 relationship with J.E. except for his relationship with J.P. Morgan's Private Bank which began long
23 before I ever met him."

24 There is overwhelming evidence that this is false. You asked Mr. Epstein for advice on your
25 salary. You shared confidential information about how your business was doing and what deals you

1 were working on. You told Mr. Epstein about meetings you had with government officials and
2 meetings that others had with government officials. And you gave Mr. Epstein multiple updates on
3 the hiring process at Barclays.

4 Why would you lie about this to the Bowdoin College trustees?

5 A Can you repeat what I said to the Bowdoin College trustees?

6 Q "At no time after his conviction in 2008 did I allow J.E. any connection with any aspects
7 of my professional life. Indeed, I have never had any professional relationship with J.E. except for
8 his relationship with J.P. Morgan's Private Bank which began long before I ever met him."

9 A And I think that was referring to like him being a client, him advising on a transaction
10 like Highbridge. I don't believe that -- I think it was actually doing business with him as opposed to
11 using him to give me counsel with respect to my career. I think those are separate things.

12 Q I don't follow that distinction. You say you didn't allow him any connection with any
13 aspects of your professional life after his conviction.

14 When he is in jail you email him asking what your salary should be. That very much seems
15 like after his conviction you are allowing him a connection to an aspect of your professional life?

16 A I think it was talking about connections of actually business being conducted in my
17 professional life, not about me.

18 Q I'm not sure what you mean by that. Connections about business?

19 A So the selling of American Century or thinking of buying -- about buying Dimensional or
20 having him involved in the acquisition of Highbridge as separate from, "I'm thinking of going to
21 Barclays, what do you think?" One is sort of advice about my professional life. The other is about
22 transactions and business.

23 Q I'm still not following you because you did both. You asked him for advice on your
24 professional life and you shared --

25 A Right, right, I think after his conviction, I wouldn't know. If I was doing a transaction, I

1 wouldn't bring him to get involved in that transaction. That's different than my personal
2 professional life.

3 Q Right. But after his conviction you did both. You shared information about deals that
4 you were working on. You --

5 A Very little.

6 Q We have talked about that, though. You shared information with him about deals that
7 you were working on. You told him about meetings you were having with government officials.

8 A And that's different.

9 Q Sure.

10 And then in the other category, you asked him for advice about what you should say to Jamie
11 Dimon in a salary negotiation.

12 A Right, again, but that's different than bringing to him actual business transactions like
13 American Century or Dimensional or Highbridge.

14 Q So you think that the natural reading of this statement that you made to the
15 Bowdoin College trustees is that you were saying that you didn't do some sort of formal business
16 with him?

17 A Yes.

18 Q When you say, "At no time after his conviction in 2008 did I allow J.E. any connection
19 with any aspect of my professional life"?

20 A That would have been public and involved in a transaction, that's correct. Whereas
21 before, he was paid \$15 million to advise on a transaction with Highbridge. That's the sort of thing I
22 was referring to.

23 Q I don't see that distinction, Mr. Staley, and, instead, it looks like you are giving
24 information to the Bowdoin trustees -- excuse me, the Bowdoin College trustees -- that is not entirely
25 accurate, because at the time all of the emails and documents that we have were not public. And if

1 you were comfortable lying before, how do we know you're not lying to us now?

2 A I'm not lying to you.

3 Q That's all we have. That concludes our hour. Thank you.

4 [Whereupon, at 5:46 p.m., the interview was concluded.]

Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date