

From: Cecile de Jongh <[REDACTED]>

To: JEE <jeevacation@gmail.com>

Subject: Tuition

Date: Wed, 10 Jun 2009 16:52:09 +0000

Attachments: Tuition_invoices_fall_09.pdf

Jeffrey,

I have attached the tuition invoices for the kids for the 2009 fall semester. As per our conversation last year, I have only included tuition/fees not room/ board. Please let me know if we can proceed with payment and if you have any questions please call me.

Summary of attachments:

JP - American University	\$17,561.00
Thomas - Elon University	\$12,744.00
Rene - Skidmore College	\$20,210.00
Michele - Wake Forrest	<u>\$19,551.00</u>
	\$70,066.00

From: Jeffrey Epstein <jeevacation@gmail.com>

To: Cecile de Jongh <[REDACTED]>, Rich Kahn <[REDACTED]>

Subject:

Date: Wed, 10 Jun 2009 20:12:23 +0000

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[REDACTED] - Wake Forrest	<u>\$19,551.00</u>
	\$70,066.00 \

To: Cecile de Jongh[REDACTED]; Rich Kahn[REDACTED]
From: Jeffrey Epstein
Sent: Wed 6/10/2009 8:12:23 PM

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Subject:

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From: Jeffrey Epstein <jeevacation@gmail.com>

To: [REDACTED] <[REDACTED]>

Subject: Fwd: Tuition

Date: Wed, 10 Jun 2009 17:02:58 +0000

Attachments: Tuition_invoices_fall_09.pdf

see what i mean

----- Forwarded message -----

From: Jeffrey Epstein <jeevacation@gmail.com>

Date: Wed, Jun 10, 2009 at 1:02 PM

Subject: Fwd: Tuition

To: Darren Indyke <[REDACTED]>

never ends

----- Forwarded message -----

From: Cecile de Jongh <[REDACTED]>

Date: Wed, Jun 10, 2009 at 12:52 PM

Subject: Tuition

To: JEE <jeevacation@gmail.com>

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From: "Rich Kahn" <[REDACTED]>
To: "Jeffrey Epstein" <jeevacation@gmail.com>
Subject: RE:
Date: Wed, 10 Jun 2009 20:23:58 +0000

Ok I will process immediately

On the topic of education I would like to ask for your assistance with tuition for my son Max. He is now 17 months and growing so fast...He will be attending a Parenting Program at Temple Shaaray Tefila beginning in September 2009. The cost is \$2200. I am so grateful for your support when we went through IVF which allowed us to have such a wonderful son. We still have 3 frozen embryos and I would like to put them to use however my wife wants to wait 6 more months. Thank you for your consideration.

Rich Kahn

HBRK Associates Inc.

PO Box 400

New York, NY 10150

tel [REDACTED]

fax 646-350-0954

cell [REDACTED]

From: Jeffrey Epstein [mailto:[REDACTED]]
Sent: Wednesday, June 10, 2009 4:12 PM
To: Cecile de Jongh; Rich Kahn
Subject:

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From: Rich Kahn
Sent: Wed 6/10/2009 8:23:58 PM
Subject: RE:

Ok I will process immediately

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J.P.Morgan

Primary Account: [REDACTED]

For the Period 5/30/09 to 6/30/09

JPMorgan Private Checking

JEFFREY EPSTEIN

JEFFREY E. EPSTEIN
8100 RED HOOK QUARTERS, STE. B3
ST. THOMAS, VI 00802

JPMORGAN CHASE BANK, N.A.
NEW YORK, NEW YORK 10017
WWW.CHASE.COM

3035

6/17/2009

PAY TO THE ORDER OF Wake Forest University \$ **19,551.00

Nineteen Thousand Five Hundred Fifty-One and 00/100

Wake Forest University
PO Box 751425
Charlotte, NC 28275-1425

MEMO Michelle T. Weibrach 06212002

007080439778 JUN 22 #0000003035 \$19,551.00

JEFFREY E. EPSTEIN
8100 RED HOOK QUARTERS, STE. B3
ST. THOMAS, VI 00802

JPMORGAN CHASE BANK, N.A.
NEW YORK, NEW YORK 10017
WWW.CHASE.COM

3036

6/17/2009

PAY TO THE ORDER OF Elon University \$ **12,744.00

Twelve Thousand Seven Hundred Forty-Four and 00/100

Elon University
PO Box 390
Elon, NC 27244

MEMO Thomas Weibrach, EJ 1339903

001480801429 JUN 25 #0000003036 \$12,744.00

JEFFREY E. EPSTEIN
8100 RED HOOK QUARTERS, STE. B3
ST. THOMAS, VI 00802

JPMORGAN CHASE BANK, N.A.
NEW YORK, NEW YORK 10017
WWW.CHASE.COM

3038

6/17/2009

PAY TO THE ORDER OF Citi Cards \$ **7,948.51

Seven Thousand Nine Hundred Forty-Eight and 51/100

Citi Cards
PO Box 183051
Columbus, OH 43218-3051

MEMO 5405 1600 4253 4204

005180966603 JUN 23 #0000003038 \$7,948.51

OR TO ACCT OF PAYEE ABSENCE OF ENDORSE CTD
USPS# LBN 2887318978304-751425-1425-22-2009

3419184468

007080439778 JUN 22 #0000003035 \$19,551.00

FOR DEPOSIT ONLY
CUMULATIVE
06/18/09

6100879478

001480801429 JUN 25 #0000003036 \$12,744.00

For Deposit Only
15 01 20 546251 06222009 Pay Any Bank
86160042534204 041 10 PEG CITIBANK OH
060209 067908 037 *122401710*

005180966603 JUN 23 #0000003038 \$7,948.51

You can conveniently view your statement and front and back images of cleared checks online. You can also sign up for a Paperless Statement, which allows you to stop receiving the paper version of your statement altogether. To enroll or for more information visit MorganOnline.com.

Primary Account: [REDACTED]
For the Period 8/1/08 to 8/29/08

JPMorgan Private Access Checking
JEFFREY EPSTEIN

2481

JEFFREY E. EPSTEIN
610 RED HOOK QUARTERS, SUITE B-3
ST. THOMAS, VI 00802

JPMORGAN CHASE BANK, N.A.
NEW YORK, NEW YORK
10017

8/26/2008

PAY TO THE ORDER OF Chase Card Services \$ 37,230.85

Thirty-Seven Thousand Two Hundred Thirty and 85/100 DOLLARS

Cardmember Services
PO Box 15153
Wilmington, DE 19805-0153

MEMO [REDACTED]

Jeffrey Epstein

AUG 26 #0000002481 \$37,230.85

5750126763
0746 00000
BAKE CHD NA
06762008

110157185 05-24-18 2075 07
0000000000 00040112 000000000000
110157185 05-24-18 2075 07

CHASE USA 85061024 485 08/24/08 >031100393< 00049 000000
22 420 921 60092

AUG 26 #0000002481 \$37,230.85

2482

JEFFREY E. EPSTEIN
610 RED HOOK QUARTERS, SUITE B-3
ST. THOMAS, VI 00802

JPMORGAN CHASE BANK, N.A.
NEW YORK, NEW YORK
10017

8/26/2008

PAY TO THE ORDER OF Chase Card Services \$ 3,360.01

Three Thousand Three Hundred Sixty and 01/100 DOLLARS

Cardmember Services
PO Box 15153
Wilmington, DE 19805-0153

MEMO [REDACTED]

Jeffrey Epstein

AUG 26 #0000002482 \$3,360.01

5750126763
0746 00000
BAKE CHD NA
06762008

110157187 05-25-18 1075 07
0000000000 00040112 000000000000
110157187 05-25-18 1075 07

CHASE USA 85061024 485 08/24/08 >031100393< 00049 000000
22 420 921 60092

AUG 26 #0000002482 \$3,360.01

2484

JEFFREY E. EPSTEIN
610 RED HOOK QUARTERS, SUITE B-3
ST. THOMAS, VI 00802

JPMORGAN CHASE BANK, N.A.
NEW YORK, NEW YORK
10017

8/21/2008

PAY TO THE ORDER OF Elon University \$ 31,484.00

Thirty-One Thousand Four Hundred Eighty-Four and 00/100 DOLLARS

Elon University

MEMO ID # 1338003 [REDACTED]

Jeffrey Epstein

AUG 26 #0000002484 \$31,484.00

AUG 26 #0000002484 \$31,484.00

You can conveniently view your statement and front and back images of cleared checks online. You can also sign up for a Paperless Statement, which allows you to stop receiving the paper version of your statement altogether. To enroll or for more information visit MorganOnline.com.

EXHIBIT 224

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE
VIRGIN ISLANDS,

Plaintiff,

v.

No. 22-cv-10904-JSR

JP MORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF JOHN P. DE JONGH, JR.
was taken on the 30th day of May, 2023 at the Law
Offices of JOEL HOLT, 2132 Company Street,
Christiansted, St. Croix U.S. Virgin Islands, between
the hours of 9:02 a.m. and 4:46 p.m. pursuant to Notice
and Federal Rules of Civil Procedure.

Reported by:

DESIREE D. HILL
Registered Merit Reporter
Hill's Reporting Services
P.O. Box 307501
St. Thomas, Virgin Islands
(340) 777-6466

1 A. Not that I recall, no.

2 Q. You don't recall a single phone
3 conversation with Jeffrey Epstein ever?

4 A. No.

5 Q. What about emails?

6 A. No.

7 Q. You don't recall a single email with
8 Epstein, ever?

9 A. From Epstein to me?

10 Q. Any kind of email contact.

11 A. Just the one that I mentioned to you.

12 Q. What year was that?

13 A. That would have been late '15 or '16 --
14 early '16.

15 Q. And what was the substance of that email
16 communication?

17 A. Nothing of substance. Just thank you.

18 Q. Thank you for what?

19 A. He had made an offer to Cecile to lend us
20 some money after the arrest that took place in order
21 to settle with the government.

22 Q. And that's the only email communication
23 that you've ever had with Epstein?

24 A. That I recall, yes.

25 Q. How long did the First Lady work for

1 Jeffrey Epstein?

2 A. I think she started in about 2000 and up
3 until she left like '18 or '19.

4 Q. So approximately 18 or 19 years?

5 A. Yeah -- yes.

6 Q. And which specific entities of his did she
7 work for?

8 A. Financial Trust Company and Southern Trust
9 Company.

10 Q. In what capacity did she work for him?

11 A. Office manager.

12 Q. What did she do in that role?

13 MR. TEAGUE: Objection, form. You
14 can answer if you know.

15 THE WITNESS: I don't know the
16 full scale, but just, you know, she
17 would tell me at times that she was
18 working on payroll, sending out letters
19 to government agencies, things -- that's
20 it. But I don't know the full range of
21 her responsibilities.

22 Q. (By Mr. O'Laughlin:) Other than the
23 in-person meetings that we discussed, the email
24 communications, the phone calls, have you had any
25 other means of contact with Jeffrey Epstein?

1 objection.

2 MR. TEAGUE: It is, because it's a
3 mischaracterization of his testimony on
4 the record. Under that objection, you
5 can answer.

6 THE WITNESS: Was I aware of --

7 Q. (By Mr. O'Laughlin:) Payments made by
8 Epstein separate and apart from campaign
9 contributions.

10 A. What do you mean --

11 MR. TEAGUE: Same objection.

12 THE WITNESS: What do you mean by
13 "payments"?

14 Q. (By Mr. O'Laughlin:) What do you understand
15 the word "payments" to mean?

16 A. It can encompass everything. I think I've
17 mentioned to you that he loaned us 200,000. Is that
18 what you mean by payment?

19 Q. What is your understanding of the word
20 "payments"?

21 MR. TEAGUE: Same objection,
22 Counsel. You had asked him at the
23 beginning of this if he didn't
24 understand the question to let you know.

25

1 2023, we're on the record.

2 MR. O'LAUGHLIN: Turn to tab 2 as
3 the next exhibit.

4 (Deposition Exhibit No. 5 was
5 marked for identification.)

6 Q. (By Mr. O'Laughlin:) So this is a January
7 24th, 2014 email from ceciledejongh@yahoo.com, and it
8 says, "Hi, Jeffrey, I have been fundraising for John's
9 final State of the Territory reception on Monday
10 night. I have raised \$15K of the total \$30K budget.
11 Would you be willing to match that? John and I will
12 cover the balance."

13 Did I read that correctly?

14 A. You did.

15 Q. What is a State of the Territory reception?

16 A. Annually, the governor is required to give
17 a state of the territory speech for the previous
18 year. Usually after the State of the Territory,
19 there is a reception that's held by the governor and
20 the staff.

21 Q. And that reception is funded not by
22 government funds?

23 A. It was not funded by government funds
24 under our administration. I can't tell you what
25 others have done.

1 Q. And you solicited \$15,000 from Epstein to
2 fund it?

3 MR. TEAGUE: Objection, form. You
4 can answer.

5 THE WITNESS: Cecile solicited
6 15,000.

7 Q. (By Mr. O'Laughlin:) Did she do this at
8 your direction?

9 A. No. As I mentioned to you earlier, what I
10 would usually do is sign letters asking for
11 contributions for various affairs. I probably signed
12 a letter to him, but I didn't specifically ask her to
13 go to Mr. Epstein.

14 Q. But you would have signed the letter to
15 Epstein requesting the funds?

16 A. Yes.

17 MR. TEAGUE: Objection, form.

18 THE WITNESS: Possibly. Like I
19 said, I'm not sure who the letters were
20 sent to, but it wouldn't surprise me if
21 he wasn't one of them.

22 Q. (By Mr. O'Laughlin:) If you look at the
23 top email in this thread, Ms. de Jongh asks, "Do you
24 want this to go through your personal account or STC?"
25 Do you see that?

1 A. I do.

2 Q. Are you aware that money was routed from
3 both Epstein and STC.

4 MS. BOGGS: Objection, form.
5 Mischaracterizes testimony.

6 MR. TEAGUE: Same objection. You
7 can answer if you know.

8 THE WITNESS: No.

9 Q. (By Mr. O'Laughlin:) Do you know why the
10 First Lady was asking Epstein which way to route the
11 money?

12 MR. TEAGUE: Objection, calls for
13 speculation. You can answer.

14 MS. BOGGS: Same.

15 THE WITNESS: No.

16 Q. (By Mr. O'Laughlin:) Are you aware of any
17 payments from Epstein that were routed through STC?

18 A. No.

19 Q. Are you aware of any payments from Epstein
20 that were routed through any of his business entities?

21 A. No.

22 MR. O'LAUGHLIN: Turn to tab 4 as
23 the next exhibit.

24

25

1 But definitely not this list because highlighted is
2 Kenneth Mapp. So no. I can't believe she supported
3 him either.

4 Q. She says, quote, "I highlighted in yellow
5 those persons whom we supported."

6 A. I'm hoping in this "we " she meant that
7 the company supported -- Epstein supported.

8 Q. You don't think that it refers to her?

9 A. I find it --

10 MS. BOGGS: Objection. Asked and
11 answered.

12 MR. TEAGUE: Objection.
13 Speculation as well.

14 THE WITNESS: I find it hard that
15 she supported Kenneth Mapp, that's all.

16 Q. (By Mr. O'Laughlin:) Do you have any
17 reason other than that to know who she meant by "we"?

18 A. No.

19 MR. O'LAUGHLIN: Turn to tab 10 as
20 the next exhibit.

21 (Deposition Exhibit No. 11 was
22 marked for identification.)

23 Q. (By Mr. O'Laughlin:) This is a
24 December 24th, 2018 email from the First Lady to
25 Epstein. She writes, "Happy holidays, Jeffrey. John

1 wanted to know whether you would support Carlton
2 Dowe's bid to go back to VIPA?"

3 Who is Carlton Dowe?

4 A. Carlton Dowe is a senator during my terms
5 in office, even before I was governor, and he was a
6 good supporter, not of just my campaigns but also a
7 good supporter of my initiatives in government.

8 Q. What do you mean good supporter?

9 A. He supported some of the legislation that
10 I wanted to put through, and he didn't support some.
11 He is someone that I could talk to.

12 Q. What would you talk to him about?

13 A. Whatever legislation or initiative I may
14 have in process.

15 Q. The statement, "John wanted to know," is
16 that a reference to you?

17 MR. TEAGUE: Objection. Calls for
18 speculation. You could answer.

19 THE WITNESS: I'm going to assume
20 it's me, yes.

21 Q. (By Mr. O'Laughlin:) Why did you want to
22 know whether Epstein would support Carlton Dowe's bid
23 to go back to VIPA?

24 MR. TEAGUE: Objection,
25 foundation. You could answer.

1 THE WITNESS: I just wanted to
2 gain as such support as I could for his
3 efforts to go back to VIPA, to the
4 Virgin Islands Port Authority.

5 Q. (By Mr. O'Laughlin:) Why?

6 A. Because I thought he would be very good at
7 the job. In 2012, when he left as a senator, I
8 appointed him to be executive director of the Virgin
9 Islands Port Authority, with the support of the
10 board, and I thought he did a good job, and I thought
11 he could do a good job again.

12 Q. And why did you want to know specifically
13 whether Epstein would support the bid or not?

14 MR. TEAGUE: Objection,
15 foundation. You can answer.

16 THE WITNESS: Nothing was specific
17 to Epstein. I was trying -- I was
18 talking to a number of people and
19 inquiring as to whether they would
20 support Carlton's bid to go back to the
21 Port Authority.

22 So Cecile saying that to him was nothing
23 unusual.

24 Q. (By Mr. O'Laughlin:) What does VIPA do?

25 A. The Virgin Islands Port Authority oversees

1 all the airports and the seaports in the Virgin
2 Islands.

3 Q. So they would have been overseeing the
4 comings and goings of people entering and exiting the
5 island?

6 MS. BOGGS: Objection, form.

7 MR. TEAGUE: Same objection.

8 THE WITNESS: No. I think that's
9 more the federal government. They're in
10 charge of the facilities, the hard
11 assets.

12 Q. (By Mr. O'Laughlin:) Like security?

13 A. Within the airport, yes.

14 Q. So VIPA oversees security within the USVI
15 airport?

16 A. Within the airport.

17 Q. And is there any sort of Customs check
18 within the airport?

19 A. When you're going through, yes.

20 Q. Is that overseen by VIPA?

21 A. That's overseen by the federal government.

22 Q. And would security officers employed by --
23 were they employed by VIPA directly?

24 MS. BOGGS: Objection, form.

25 MR. TEAGUE: Same objection.

1 THE WITNESS: That I can't answer.

2 Q. (By Mr. O'Laughlin:) But they oversaw them?

3 A. Yes.

4 MS. BOGGS: Objection, form.

5 MR. TEAGUE: Objection, form.

6 Q. (By Mr. O'Laughlin:) Are you aware of
7 allegations that Epstein was bringing women in and out
8 through the USVI airport?

9 MS. BOGGS: Objection, form.

10 THE WITNESS: Are we talking in
11 2014 during my term or are we talking
12 2018 and '19?

13 Q. (By Mr. O'Laughlin:) Let's answer both.
14 What about in 2014?

15 A. No.

16 Q. What about in 2018?

17 A. Yes.

18 Q. So in 2018, you were aware of allegations
19 that Epstein was bringing women in and out through the
20 V.I. airport?

21 MS. BOGGS: Objection, form.

22 MR. TEAGUE: Same objection.

23 THE WITNESS: When you say
24 "airport," I am presuming you mean the
25 building. Mr. Epstein had a private

1 whether it was salary or bonus. I wouldn't do that.
2 I just can't recall that detail.

3 Q. Were there any benefits in addition to
4 salary that the First Lady received from Epstein?

5 A. Similar to other employees in the office,
6 we had educational benefits for our children. I
7 think in the beginning at least, I think it
8 continued -- I think it was 32 hours of work instead
9 of 40. So I think those were the other two benefits.

10 Q. What do you mean by educational benefits?

11 A. Part of the package that she received was
12 to have our tuition paid for our children if they
13 went to a private school, which was similar to what
14 was negotiated for the other employees in the office.

15 Q. Did that apply to a primary school tuition?

16 A. If they went to a private school.

17 Q. Did it apply to high school tuition?

18 A. Yes.

19 Q. Did it apply to college tuition?

20 A. Yes.

21 Q. How much?

22 A. I don't know the dollar amount.

23 MR. O'LAUGHLIN: Let's enter tabs

24 12 and 11 as the next exhibit.

25

1 (Deposition Exhibit No. 13 was
2 marked for identification.)

3 Q. (By Mr. O'Laughlin:) This is a
4 January 10th, 2000 email from Epstein to First Lady
5 and Richard Kahn, and it has a summary of attachments
6 that sets out amounts of payment. It has an entry for
7 "Michelle at Wake Forest, \$19,551; Rene, Skidmore
8 College, \$20,210; Thomas, Elon University, \$12,744;
9 and JP, American University, \$17,561."

10 Did I read notes correctly?

11 A. Yes.

12 Q. Is JP a reference to your son?

13 MS. BOGGS: Objection. Calls for
14 speculation. Lack of foundation.

15 MR. TEAGUE: Same objection. You
16 can answer.

17 THE WITNESS: I believe so, yes.

18 Q. (By Mr. O'Laughlin:) Is Renee a reference
19 to your daughter?

20 MS. BOGGS: Same objections.

21 MR. TEAGUE: Same objections. She
22 can answer.

23 THE WITNESS: Yes.

24 Q. (By Mr. O'Laughlin:) Is Thomas a reference
25 to Jean Brennan's son?

1 MS. BOGGS: Same objections?

2 MR. TEAGUE: Join.

3 THE WITNESS: I'm going to presume
4 so, yes.

5 Q. (By Mr. O'Laughlin:) Is Michelle a
6 reference to Jean Brennan's daughter?

7 MS. BOGGS: Same objections.

8 MR. TEAGUE: Join that objection.

9 THE WITNESS: I presume, yes.

10 Q. (By Mr. O'Laughlin:) So this is a summary
11 of tuition payments that were being made by Epstein to
12 pay for the tuition of those four children.

13 MS. BOGGS: Same objections.

14 MR. TEAGUE: Objection. Calls for
15 speculation. You can answer.

16 THE WITNESS: I presume so, yes.

17 Q. (By Mr. O'Laughlin:) And Jean Brennan was
18 the -- what was her position with your campaign?

19 A. Accountant.

20 Q. So this is for 2009. So if you sum
21 together the amount for JP and Renee, you received
22 \$37,771 in the form of tuition payments from Epstein?

23 MR. TEAGUE: Same objection.

24 MS. BOGGS: Objection. Calls for
25 speculation, form, lack of foundation.

1 THE WITNESS: I can't answer that.

2 I haven't done the math. I haven't.

3 Q. (By Mr. O'Laughlin:) But if you add the
4 17,561 here with the 20,210.

5 A. Yes.

6 MS. BOGGS: Same objection.

7 MR. O'LAUGHLIN: Okay. Let's
8 enter tab 18 as the next exhibit.

9 MS. BOGGS: Will this be Exhibit
10 14?

11 (Deposition Exhibit No. 14 was
12 marked for identification.)

13 Q. (By Mr. O'Laughlin:) So this is an email
14 thread between the First Lady and Epstein on
15 September 21, 2010. She writes, "I have not received
16 an answer or indication from you on this subject, so I
17 have to assume that it is no. If that is the case, I
18 will need to negotiate a raise so that I can afford to
19 pay for my children's tuition at college. John and I
20 have put money into the campaign based on what we
21 thought was going to happen with the tuition
22 payments." Did I read that correctly?

23 MR. TEAGUE: You were reading from
24 the second page. He was on the first.

25 THE WITNESS: I didn't see -- I

1 didn't know you did the back and front.

2 Yes.

3 Q. (By Mr. O'Laughlin:) How much money did
4 you put into your campaign based on expectations that
5 Epstein would pay for your children's tuition?

6 MR. TEAGUE: Objection,
7 foundation. You can answer.

8 THE WITNESS: I don't recall off
9 the top of my head, but it was quite a
10 bit.

11 Q. (By Mr. O'Laughlin:) Was it equal to the
12 amount of the tuition payments that you were getting?

13 MS. BOGGS: Objection, form.

14 MR. TEAGUE: Same objection.

15 THE WITNESS: It was substantial.

16 Q. (By Mr. O'Laughlin:) What you mean by
17 quite a bit?

18 A. We paid for various items during the
19 campaign, t-shirts, some literature, things like
20 that.

21 Q. Can you estimate?

22 A. T-shirts alone, for example, could be
23 \$7,000; literature could come in anywhere around, you
24 know, 10 to 6,000.

25 Q. Was the First Lady taking tuition payments

1 substance, no.

2 Q. (By Mr. O'Laughlin:) And she continued
3 accepting the tuition payments?

4 MS. BOGGS: Objection. Calls for
5 speculation, form.

6 MR. TEAGUE: Objection.
7 Foundation as well.

8 THE WITNESS: Make sure I
9 understand. Did she get a salary
10 increase and receive tuition payments?

11 Q. (By Mr. O'Laughlin:) No, I'm just asking,
12 did she continue to receive tuition payments after
13 these 2010 emails.

14 MS. BOGGS: Same objections.

15 THE WITNESS: That I can't -- I
16 don't recall.

17 Q. (By Mr. O'Laughlin:) Weren't you involved
18 in the finances around paying for your children's
19 tuition?

20 A. I was. But I'm not sure what the numbers
21 were.

22 Q. But you know whether you were paying the
23 tuition bill or Epstein was the paying tuition bill,
24 correct?

25 MS. BOGGS: Objection. Objection,

1 argumentative.

2 THE WITNESS: I still pay tuition
3 fees and various things for my kids when
4 they were in college. So I'm not sure
5 how it worked out.

6 Q. (By Mr. O'Laughlin:) Were the fees you
7 were paying room and board?

8 A. Some was for room, particularly, with J.P.

9 Q. So who was paying the tuition, you or
10 Epstein?

11 A. I would think Epstein was, yes.

12 Q. Was that all the way through his school?

13 A. That I don't recall. There was a point
14 where, I think, we started paying, I believe.

15 Q. Why did you start paying?

16 A. I think Cecile may have renegotiated her
17 salary or it increased and she didn't want to pass it
18 on.

19 Q. Do you know when that change would have
20 happened?

21 A. No, that I don't recall.

22 Q. So that's for John. What about for Renee?

23 A. No. It was for John, JP.

24 MR. O'LAUGHLIN: Look under tab

25 14.

1 (Deposition Exhibit No. 15 was
2 marked for identification.)

3 Q. (By Mr. O'Laughlin:) This is a
4 December 2010 email to Epstein from the First Lady
5 attaching tuition bills for the spring semester of
6 American University and Skidmore College, and putting
7 the amounts for each of those tuition bills at 18,090
8 and 20,175.

9 So in 2010, you and the First Lady
10 received approximately 38,000 from Epstein in the
11 form of tuition payments, correct?

12 MS. BOGGS: Objection, calls for
13 speculation, lack of foundation, form.

14 MR. TEAGUE: Same objections. You
15 can answer.

16 THE WITNESS: Yes, based on the
17 numbers on the Exhibit 13 I'm looking
18 at.

19 Q. (By Mr. O'Laughlin:) And did you declare
20 that as income in 2010?

21 MS. BOGGS: Objection, form.

22 THE WITNESS: Again, I'll have to
23 look at the taxes, but if we gave it to
24 the accountant, it was prepared.

25 Q. (By Mr. O'Laughlin:) You believe it was

1 declared as income?

2 A. I believe.

3 Q. Let's enter tabs 15 and 16 as the next
4 exhibit.

5 (Deposition Exhibit No. 16 was
6 marked for identification.)

7 Q. (By Mr. O'Laughlin:) This is an email with
8 the subject line: "Please approve," sent from the
9 First Lady to Epstein, and an "Attachment: Skidmore
10 Fall 2011."

11 And then the attachment contains a
12 statement of student account from the Skidmore
13 Bursar's office listing the amount due as
14 \$24,955.50.

15 So was this amount paid by Epstein in
16 2011?

17 MR. TEAGUE: Objection. Form.

18 MS. BOGGS: Objection. Lack of
19 foundation. Form.

20 THE WITNESS: Again, I'm going by
21 the email. I assume it was.

22 Q. (By Mr. O'Laughlin:) And did you declare
23 that as income in 2011?

24 MS. BOGGS: Objection. Form.

25 THE WITNESS: Again, based on my

1 taxes.

2 MR. O'LAUGHLIN: Let's do tab 20

3 and 21.

4 (Deposition Exhibit No. 17 was

5 marked for identification.)

6 Q. (By Mr. O'Laughlin:) This is a
7 December 9th, 2011 email from the First Lady to
8 Epstein, attaching spring 2012 tuition bills for
9 Skidmore College in the amount of 20,710, and asking
10 Epstein, "Please approve this payment so that Rich can
11 process it."

12 And so if you take the fall 2011 amount
13 that we just looked at of 24,000, and then the
14 spring of 2012 that we looked at and combine them,
15 it shows that in the 2011 to 2012 school year, your
16 family received approximately 49,000 in tuition
17 payments for your children from Epstein, correct?

18 MS. BOGGS: Objection. Lack of
19 foundation. Calls for speculation.
20 Mischaracterization.

21 MR. TEAGUE: Object. Join those
22 objections. Also foundation. You can
23 answer.

24 THE WITNESS: Based on the numbers
25 you've provided me.

1 Q. (By Mr. O'Laughlin:) And was that amount
2 declared as income in your 2011 returns and your 2012
3 returns?

4 A. Should have been, yeah.

5 Q. What is the EDA?

6 A. What is the --

7 Q. EDA?

8 A. Virgin Islands Economic Development
9 Authority.

10 Q. Actually, before I go there, are you
11 aware -- beyond the payments we've just looked at, are
12 you aware of any other tuition payments made by
13 Epstein to you?

14 MR. TEAGUE: Objection, vague.

15 MS. BOGGS: Objection, form.

16 THE WITNESS: No.

17 Q. (By Mr. O'Laughlin:) But as far as you
18 know, he paid the tuition for your children all the
19 way through college, correct?

20 MS. BOGGS: Objection, form.

21 MR. TEAGUE: Objection, form.

22 Foundation.

23 THE WITNESS: That I don't recall.

24 I think there was a point where he did
25 not directly.

1 A. No.

2 Q. How do you know he had ownership interest?

3 A. I was told that by Andrew Farkas.

4 Q. When were you told that?

5 A. In 2007.

6 Q. Is the governor's office involved in
7 granting EDA benefits?

8 A. It's involved -- it affirms the decision
9 of the EDA board that grants the benefits, yes.

10 Q. And what is the process surrounding that?

11 A. The process surrounding the governor's
12 involvement?

13 Q. Yeah.

14 A. The beneficiary will submit the
15 application to the Economic Development Authority,
16 which is then reviewed by their staff. They will go
17 through the process, according to their rules and
18 regulations as to whether it fits under the
19 requirements.

20 It will then be presented by the staff
21 to the board of the EDA, either with a recommendation
22 to approve or disapprove.

23 The board will then make its
24 determination as to which way they're going.

25 If it's approved, it is then sent up to

1 governor's office and sent to legal counsel. Legal
2 counsel does its review of it, and then at that
3 point, it will come to the governor for signature.
4 That was at least the process that we followed.

5 Q. And so focusing on the portion that
6 involves the governor's office, what exactly does that
7 review entail?

8 MR. TEAGUE: Objection, asked and
9 answered. You can answer it.

10 THE WITNESS: It involves their
11 basically reviewing the decision that
12 the board made to make sure they
13 complied with the Economic Development
14 Authority rules and regulations.

15 Q. (By Mr. O'Laughlin:) And -- so they take
16 the regulations from the EDA and they look at the
17 application and they compare the two?

18 A. The regulations are codified, our rules
19 and regs. They would then look at the application,
20 review the application, and then make a
21 recommendation.

22 Q. And the -- what is the thing they're
23 evaluating for? Just compliance with the EDA regs?

24 A. And to see how the board approved it,
25 right. And the type of business activity that would

1 to what extent. They may call the EDA
2 to find out more on the activity.
3 They'll look at the rules and
4 regulations.

5 Q. (By Mr. O'Laughlin:) And is a
6 recommendation made to you personally?

7 A. It's made to me, yes. Was made to me,
8 yes.

9 Q. And then you review it?

10 A. I review the cover memorandum, usually, of
11 what was provided to me by my legal counsel. I may
12 get a little bit more into the activities and
13 understand the type of business it is.

14 Q. What do you do to get a little more into
15 the underlying business?

16 A. Just look if -- the overview would provide
17 the business, the type of activity. I may or may not
18 look at the application just to understand if it was
19 an unusual business.

20 Q. Would you ever reach out to the person who
21 is applying to ask them questions?

22 A. No.

23 Q. Would you look at the financial projections
24 that they submitted?

25 A. No.

1 Q. Would you do any kind of diligence on the
2 business itself to see that they were doing what they
3 claimed to be doing?

4 MS. BOGGS: Objection, form.

5 MR. TEAGUE: Same objection.

6 Foundation as well. You can answer.

7 THE WITNESS: I presume that by
8 the time it came to me after the
9 analysis done by EDA staff and the board
10 and my legal counsel, that that was less
11 of an issue.

12 THE REPORTER: I'm sorry, that
13 was --

14 THE WITNESS: Less of an issue.

15 Q. (By Mr. O'Laughlin:) So what is
16 specifically the thing that you are reviewing for?

17 A. The legal opinion, making sure it is
18 consistent with the rules and regulations, looking at
19 the business activity, looking at the economic
20 development, diversification that was taking place in
21 the territory.

22 Q. What do you mean by looking at the business
23 activity?

24 A. If it was unusual. One year, we had
25 someone that applied that wanted to do manufacturing.

1 We don't have very many manufacturers in the Virgin
2 Islands, so I just looked at the application to make
3 sure I understood.

4 Some were looking at foreign
5 destinations to sell their products. I wanted to
6 see, you know, what percentage of their business
7 activity they were looking at. Was it -- did they
8 consider the U.S. foreign or where are they selling?
9 So I would look at things like that.

10 Q. What would you do if the business -- the
11 underlying business activity did strike you as
12 unusual?

13 A. I would, then, more than likely not call
14 the individual. I'd probably call my attorney and
15 ask him to look into it.

16 Q. And they would go and report back to you?

17 A. Correct.

18 Q. Did you review Financial Trust's
19 application?

20 A. Yes.

21 Q. Did you review Southern Trust's
22 application?

23 A. No.

24 Q. Okay. Did you find any of their activity
25 unusual?

1 A. No.

2 Q. Did you ask anyone to do any further
3 investigation into them?

4 A. No.

5 Q. Did you consider the character and fitness
6 of applicants as part of your review?

7 A. I went by the recommendation by my legal
8 counsel, usually.

9 Q. Do you know if your legal counsel would
10 look into the character and fitness of applicants?

11 A. I don't.

12 Q. Do you know if they would do a background
13 check?

14 A. Beyond what EDA and the work that they may
15 have done? I'm not aware.

16 Q. You're not aware of any background check?

17 A. I'm not aware if they did, if they went
18 further.

19 Q. Are you aware of any investigation of
20 public reporting surrounding beneficiaries?

21 MS. BOGGS: Objection, form.

22 THE WITNESS: I'm not quite sure I
23 understand.

24 Q. (By Mr. O'Laughlin:) Are you aware of any
25 investigation undertaken by your office into public

1 reporting surrounding the beneficiaries?

2 A. No.

3 MS. BOGGS: Same objection.

4 Q. (By Mr. O'Laughlin:) Did you consider
5 Epstein's past criminal conviction when you reviewed
6 the Financial Trust application?

7 A. I went sole --

8 MS. BOGGS: Objection, form.

9 MR. TEAGUE: Same objection.
10 Foundation as well.

11 THE WITNESS: I went solely on the
12 recommendations of the staff -- of my
13 legal counsel.

14 Q. (By Mr. O'Laughlin:) So you didn't
15 independently consider his sex offender status?

16 MS. BOGGS: Objection, form.

17 MR. TEAGUE: Same objections.

18 THE WITNESS: No.

19 Q. (By Mr. O'Laughlin:) And you didn't
20 independently consider his past criminal convictions?

21 MS. BOGGS: Objection, form.

22 THE WITNESS: No.

23 MR. TEAGUE: Objection, form.

24 Mischaracterization.

25 THE REPORTER: Hold on.

1 MR. TEAGUE: Mischaracterization
2 as well.

3 Q. (By Mr. O'Laughlin:) And you didn't
4 independently consider public reporting surrounding
5 Epstein?

6 MS. BOGGS: Objection, form.

7 THE WITNESS: No.

8 Q. (By Mr. O'Laughlin:) Did you reach out to
9 the First Lady?

10 A. No.

11 MS. BOGGS: Objection, form. When
12 you say "First Lady," can you clarify
13 who you mean?

14 Q. (By Mr. O'Laughlin:) So throughout this
15 deposition if I refer to First Lady, do you understand
16 that I'm referring to First Lady, Cecile de Jongh,
17 your wife?

18 A. Okay.

19 Q. Okay. Did you perceive any conflict of
20 interest in approving benefits to Epstein's company --

21 MS. BOGGS: Objection.

22 Q. (By Mr. O'Laughlin:) -- companies given
23 that your wife worked for them?

24 MS. BOGGS: Objection, form.

25 THE WITNESS: No.

1 Q. (By Mr. O'Laughlin:) Did you ask your
2 legal counsel to provide any opinion on any potential
3 conflict of interest?

4 MS. BOGGS: Objection, form. Also
5 privileged to the extent it reveals the
6 substance of any communications between
7 Governor de Jongh and his legal counsel.

8 MR. TEAGUE: Same objection. You
9 can answer.

10 THE WITNESS: No.

11 Q. (By Mr. O'Laughlin:) Did you ask for any
12 assessment of any kind of any potential conflict of
13 interest?

14 MS. BOGGS: Same objections to the
15 extent we're talking about
16 communications between your attorney and
17 you.

18 MR. TEAGUE: Same objection.

19 THE WITNESS: No.

20 Q. (By Mr. O'Laughlin:) Are you aware that
21 any investigation of any kind was undertaken to assess
22 any potential conflicts of interest?

23 MS. BOGGS: Same objections.

24 MR. TEAGUE: Same.

25 THE WITNESS: No, I'm not aware of

1 any investigations.

2 Q. (By Mr. O'Laughlin:) So you testified that
3 you didn't approve Southern Trust, correct?

4 MR. TEAGUE: Objection,
5 mischaracterization.

6 THE WITNESS: No. I said I did
7 approve Southern Trust.

8 Q. (By Mr. O'Laughlin:) I thought you said
9 you did approve Financial Trust but not Southern
10 Trust.

11 A. I believe I said approved Southern Trust.

12 MR. TEAGUE: Objection.

13 Mischaracterization of prior testimony.

14 Q. (By Mr. O'Laughlin:) Okay. So just to
15 clarify --

16 MR. TEAGUE: You have to let me
17 finish my objection as well, Counsel.

18 Go ahead.

19 Q. (By Mr. O'Laughlin:) So just to clarify,
20 your belief is that you reviewed and approved both
21 Financial Trust and Southern Trust?

22 A. I approved what the EDA board did, yes.

23 Q. Okay. With respect to both those entities?

24 A. Based on their recommendations, yes.

25 MR. O'LAUGHLIN: Okay. Let's

1 analysis would have been stored in the government's
2 records?

3 MS. BOGGS: Objection, form.

4 MR. TEAGUE: Same objection. And
5 objection to the extent of privilege,
6 but you can answer.

7 THE WITNESS: No, I don't have any
8 knowledge.

9 Q. (By Mr. O'Laughlin:) So if you go to the
10 last page of the letter to you -- this letter, by the
11 way, is sent by Albert Bryan, then chairman of the
12 EDA.

13 Who is Albert Bryan?

14 A. Chairman of the EDA and he was my
15 commissioner of Labor.

16 Q. During what years?

17 A. 2007 to 2014.

18 Q. And what does he do now?

19 A. He's now the governor of the Virgin
20 Islands.

21 Q. So at the time he was chairman of the EDA?

22 A. Yes.

23 Q. And he, in that capacity, signed off on
24 Epstein's tax benefits?

25 A. Based on what you're showing me, yes.

1 Q. And then he forwarded them to you for your
2 review?

3 MR. TEAGUE: Objection, form.

4 THE WITNESS: EDA forwarded it to
5 me, yes.

6 Q. (By Mr. O'Laughlin:) And then you signed
7 off on the tax benefits?

8 A. That's correct.

9 Q. Is that your signature on page 5?

10 A. Yes, it is.

11 Q. With an approval date of May 31st, 2013?

12 A. Yes.

13 Q. So the letter that you signed lays out the
14 benefits that Epstein was receiving through Southern
15 Trust under section B.

16 MS. BOGGS: Objection, form.

17 Mischaracterization.

18 Q. (By Mr. O'Laughlin:) Sorry. Under
19 Sections A through G.

20 MS. BOGGS: Same objections.

21 MR. TEAGUE: Also object to the
22 extent that the document speaks for
23 itself.

24 Q. (By Mr. O'Laughlin:) Do you see that?

25 A. Yes.

1 fact as part of your consideration?

2 A. No, I don't recall the specifics of what
3 was provided to me back then.

4 Q. Nothing stood out to you with respect to
5 Southern Trust Company in terms of the cost benefit
6 analysis being un-advantageous to the USVI?

7 A. No, nothing stood out.

8 MS. BOGGS: Objection, form.

9 Mischaracterization.

10 MR. TEAGUE: Foundation as well.

11 Q. (By Mr. O'Laughlin:) So there were no red
12 flags based on the potential that Epstein was giving
13 only a few pennies and getting a whole dollar for each
14 dollar benefit, correct?

15 MS. BOGGS: Objection, form.

16 Speculation. Mischaracterization.

17 MR. TEAGUE: Join. I join the
18 objection.

19 THE WITNESS: Dollars and pennies,
20 and I just have no knowledge of that.

21 Q. (By Mr. O'Laughlin:) Okay. Under the
22 Special Conditions section of the letter, there's an
23 itemized list of the conditions that Southern Trust
24 has to comply with as part of receiving benefits.

25 Do you see that?

1 A. I do.

2 Q. Focusing on number 4, it says, "Southern
3 Trust will provide its full-time employees and
4 dependents with one hundred percent employer paid
5 medical insurance coverage."

6 Do you see that?

7 A. I do.

8 Q. Was an employee of Southern Trust the First
9 Lady?

10 A. She was.

11 Q. Were you a dependent of the First Lady?

12 A. No.

13 Q. How not?

14 A. I was covered under my government
15 insurance.

16 Q. Okay. So you didn't receive any benefits
17 pursuant to this.

18 A. No.

19 MS. BOGGS: Objection, form.

20 Q. (By Mr. O'Laughlin:) Okay.

21 A. No, I did not.

22 Q. If you look at number 9, it says, "Southern
23 Trust will provide its employees tuition,
24 reimbursement, employee training and continuing
25 professional educational courses for programs related

1 to an employee's job function and approved by
2 management. The maximum assistance to be provided to
3 an eligible employee during calendar year is \$5000."

4 Did you see that?

5 A. I do.

6 Q. Is this the provision that provided for the
7 reimbursement tuition payments?

8 MS. BOGGS: Objection, foundation,
9 form, speculation.

10 MR. TEAGUE: Same objection.

11 THE WITNESS: I can't answer that.

12 I don't know -- I don't know what the --

13 I don't know. This is in 2013.

14 Southern Trust, I am not quite sure how
15 it's being applied.

16 Q. (By Mr. O'Laughlin:) So you don't know
17 whether the tuition payments were pursuant to this
18 particular special condition?

19 A. I don't.

20 MS. BOGGS: Objection. Same
21 objections.

22 MR. TEAGUE: Same.

23 Q. (By Mr. O'Laughlin:) Were the tuition
24 payments that were made in excess of \$5,000?

25 A. Based on the list you gave me, yes.

1 MR. O'LAUGHLIN: Let's enter tab
2 22 as the next exhibit.

3 (Deposition Exhibit No. 19 was
4 marked for identification.)

5 THE WITNESS: Could I just make
6 one statement?

7 Q. (By Mr. O'Laughlin:) Sure.

8 A. The tuition payments were in 2010 and '11,
9 not '13.

10 Q. Were you aware of a previous review of
11 Financial Trust Company?

12 A. I'm sorry, what do you mean by that?

13 Q. The granting of benefits to Financial Trust
14 Company?

15 A. I believe I approved Financial Trust
16 Company when it came up for renewal, I believe.

17 Q. Do you recall whether it would have had
18 this same or similar special conditions?

19 MS. BOGGS: Objection, lack of
20 foundation, form.

21 MR. TEAGUE: Right. Real fast
22 before we go into this next exhibit. I
23 apologize, I need to take a bathroom
24 break real fast. That's on me.

25 VIDEOGRAPHER: We are going off

1 to anyone in the Governor's office on behalf of
2 Epstein regarding this response?

3 MS. BOGGS: Objection, form.

4 THE WITNESS: No.

5 Q. (By Mr. O'Laughlin:) So let's look at the
6 underlying questions that were asked by the reporter.
7 In section 1, He asks about the fact that you signed
8 an approval letter for a five-year extension of EDC
9 benefits to FTC and notes that the statute requires
10 the EDC director to examine the character of
11 applicants.

12 Do you see that?

13 A. I do.

14 Q. Do you know if that character analysis was
15 done?

16 A. Again, like I mentioned to you earlier, I
17 went on the recommendation of the board, whatever
18 their analysis was, and I also then went on my legal
19 counsel's recommendation. So what they did, I'm not
20 sure.

21 Q. Did they make a recommendation to you that
22 Epstein was of the requisite character to receive the
23 benefits?

24 A. They made a recommendation that FTC should
25 be approved for benefits.

1 Q. And do you know whether that included a
2 recommendation that his character was --

3 A. I don't recall.

4 MS. BOGGS: Objection.

5 Mischaracterizes his testimony.

6 Q. (By Mr. O'Laughlin:) What is your personal
7 belief as whether his character merited receiving EDC
8 benefits?

9 MR. TEAGUE: Objection, form.

10 MS. BOGGS: Same objection.

11 THE WITNESS: 2012, I went on the
12 recommendation. I didn't give it much
13 thought beyond that.

14 Q. (By Mr. O'Laughlin:) So you didn't say, I
15 don't think that his character is appropriate?

16 A. I don't recall, no.

17 Q. You just went with the recommendation?

18 A. I went with the recommendation, yes.

19 Q. The last question in section 1 from the
20 reporter is, "Do you believe registered sexual
21 offender, guilty of such violations, should be
22 receiving these benefits?"

23 Do you see that?

24 A. I do.

25 Q. What's your answer to that question?

1 MS. BOGGS: Objection, form. Lack
2 of foundation.

3 THE WITNESS: Again, I'm not --
4 you know, I went on the recommendation
5 of the board and on the recommendation
6 of counsel.

7 Q. (By Mr. O'Laughlin:) But what is your
8 answer to that question?

9 MS. BOGGS: Same objection.

10 MR. TEAGUE: Objection. Asked and
11 answered.

12 THE WITNESS: I went on the
13 recommendation of counsel and the board,
14 and I approved the benefits.

15 Q. (By Mr. O'Laughlin:) So you approved the
16 benefits because you thought he should be receiving
17 them?

18 MR. TEAGUE: Objection.

19 MS. BOGGS: Objection,
20 mischaracterizes testimony, lack of
21 foundation, form.

22 MR. TEAGUE: And asked and
23 answered. I join in those objections as
24 well.

25 THE WITNESS: I approved the

1 terms of someone bringing it to my
2 attention?

3 Q. (By Mr. O'Laughlin:) Did the First Lady
4 ever try to avoid things coming to your desk that
5 would impact Epstein?

6 MS. BOGGS: Objection.

7 MR. TEAGUE: Objection, calls for
8 speculation, form, lack of foundation.

9 MS. BOGGS: Same objection.

10 THE WITNESS: I don't know for
11 certain but I'm assuming she did.

12 MR. O'LAUGHLIN: Let's look at tab
13 30.

14 (Deposition Exhibit No. 26 was
15 marked for identification.)

16 Q. (By Mr. O'Laughlin:) This is an
17 August 5th, 2013 email from the First Lady to Epstein
18 commenting on an apparent dispute, First Resort versus
19 LSJ, LLC, and she writes, "Additionally, this will end
20 up on John's desk and he would just as soon avoid
21 that."

22 Do you see that?

23 A. I do.

24 Q. Do you know what this dispute involved?

25 MS. BOGGS: Objection, lack of

1 probationers." Do you see that, the first -- the
2 second sentence?

3 A. The email from Jeffrey Epstein to Cecile?

4 Q. No. The -- yes, yes.

5 A. Right. I'm not copied on that.

6 Q. Right. But do you see that sentence?

7 A. Yes.

8 Q. So it's about transferring parole --

9 MS. BOGGS: Objection.

10 Q. (By Mr. O'Laughlin) -- given the reference
11 to probationers?

12 MS. BOGGS: Objection, lack of
13 foundation, calls for speculation.

14 THE WITNESS: Yes.

15 Q. (By Mr. O'Laughlin:) Were there
16 discussions of transferring Epstein's house arrest to
17 the USVI at any point?

18 A. Not with me.

19 Q. You're not aware of any conversations at
20 any point regarding transferring Epstein's house
21 arrest from the USVI -- from Florida to the USVI?

22 A. I always recommended that Cecile and her
23 attorneys talk directly to Vincent. So substantive
24 -- substance of those discussions, no, I'm not aware
25 of.

1 Q. So you've testified that you didn't receive
2 the underlying document, correct?

3 MS. BOGGS: Objection,
4 mischaracterizes testimony.

5 THE WITNESS: When you refer to
6 the "underlying document," are you
7 talking about the document that was
8 corrupted?

9 Q. (By Mr. O'Laughlin:) Yes.

10 A. I guess I received the document. I
11 couldn't open it.

12 Q. Okay. On Thursday, April 9th at 9:18 a.m.,
13 which is about 20 minutes after the earlier email
14 where the First Lady asks for the document to be
15 resent, she says to Epstein, "Thanks. Sending again
16 to John."

17 Do you see that?

18 A. Yes.

19 Q. Do you receive -- do you recall receiving
20 that document in that follow-up transmission?

21 A. I don't recall, but if I did, I would have
22 sent it straight to Vincent.

23 Q. And she -- in fact, she says, the First
24 Lady says, "John will email to Vincent," correct?

25 A. Correct.

1 Q. Did you email the document to Vincent
2 Frazer?

3 MR. TEAGUE: Objection.

4 MS. BOGGS: Objection, asked and
5 answered, lack of foundation.

6 THE WITNESS: I believe I did,
7 yes.

8 Q. (By Mr. O'Laughlin:) And do you know what
9 was in the document?

10 A. No.

11 Q. So you forwarded a document without knowing
12 what was in it?

13 MS. BOGGS: Objection, lack of
14 foundation, argumentative.

15 THE WITNESS: Not very unusual in
16 terms of the substance of the document.

17 Q. (By Mr. O'Laughlin:) So it's not unusual
18 for you to have received a document with a subject
19 line, "Confidential" from Epstein and forwarded to the
20 attorney general without looking at it?

21 MS. BOGGS: Objection, lack of
22 foundation, calls for speculation, form.

23 THE WITNESS: It's not unusual for
24 me to receive documents that post the
25 subject line. I may not go into the

1 being sent to you from me and I'm giving
2 it for his review. There's no substance
3 to our discussions at all.

4 Q. (By Mr. O'Laughlin:) sorry, who --
5 something is being sent from who to who?

6 A. From the attorney -- from myself to the
7 attorney general, there were no discussions on the
8 substance of it.

9 Q. What was sent from you to the attorney
10 general?

11 A. What Cecile sent me that you -- that I
12 could not open.

13 Q. So just to be clear, there's two different
14 time periods. In 2009, there was that document that
15 was sent to you that you couldn't open --

16 A. Eh-hmm.

17 Q. -- regarding the transfer of parole from
18 Florida to USVI, correct?

19 A. Correct.

20 Q. And then in 2012, three years later, there
21 was a separate legislation regarding SORNA, correct?

22 A. Correct.

23 MR. TEAGUE: Objection,
24 foundation.

25 Q. (By Mr. O'Laughlin:) And so were there --

1 did you have any involvement in the 2011, 2012 period
2 regarding the SORNA legislation?

3 MS. BOGGS: Objection, lack of
4 foundation.

5 THE WITNESS: Not in terms of
6 substantive discussions with the
7 attorney general.

8 Q. (By Mr. O'Laughlin:) What -- when you say
9 substantive discussions, what do you mean?

10 MS. BOGGS: Objection. I'm going
11 to instruct the witness not to answer if
12 it involves legal advice or seeking
13 legal advice or seeking legal advice
14 from the attorney general.

15 THE WITNESS: Other than to review
16 what you're looking at, that's it. The
17 attorney general and I did not have a
18 discussion about Mr. Epstein or any
19 others on the sexual offender list at
20 all.

21 Q. (By Mr. O'Laughlin:) So what discussions
22 were there regarding SORNA?

23 MS. BOGGS: Objection. Again, I
24 am going to instruct the witness not to
25 answer in regard to any legal advice or

1 seeking legal advice from the attorney
2 general.

3 THE WITNESS: Again, I don't
4 recall anything of substance. Something
5 along that nature, I would pass on to
6 the attorney general and be guided by
7 what came back to me.

8 Q. (By Mr. O'Laughlin:) Were you ultimately
9 the one who signed off on the legislation as the
10 executive?

11 A. Once it was approved by the legislature, I
12 must have been.

13 Q. And so what was your involvement in
14 considering the changes to the legislation?

15 A. Any of the recommendations that the AG may
16 have proposed.

17 MS. BOGGS: Objection. Again, I'm
18 going to instruct the witness not to
19 reveal any communications with the AG
20 regarding legal advice or seeking legal
21 advice.

22 THE WITNESS: And my policy to
23 him, have the team look at. I probably
24 did sign the legislation -- I'm
25 presuming I signed it.

1 Q. (By Mr. O'Laughlin:) Do you recall what
2 the policy team's position was on the legislation?

3 A. No, but I presume it was to sign it.

4 Q. Do you recall what the nature of the
5 amendments was?

6 A. No, not at all.

7 Q. Do you recall what the substance of the
8 discussions in the legislature were surrounding SORNA?

9 A. No.

10 Q. Did you discuss the bill with the First
11 Lady?

12 A. I did not.

13 Q. Did you discuss the bill with Epstein?

14 MS. BOGGS: Objection, form.

15 THE WITNESS: Of course not.

16 Q. (By Mr. O'Laughlin:) Did you discuss the
17 bill with any of Epstein's associates?

18 MS. BOGGS: Objection, form.

19 THE WITNESS: Of course not.

20 Q. (By Mr. O'Laughlin:) Did you advocate for
21 changes to the legislation?

22 MS. BOGGS: Objection, form.

23 THE WITNESS: I did not.

24 Q. (By Mr. O'Laughlin:) So Epstein had no
25 input of any kind into your consideration of the SORNA

1 entirely sure. I think perhaps he finally focused
2 on the issue at hand and decided that he personally
3 did not like the language. John is going to speak
4 to him when he gets back."

5 Did I read that correctly?

6 A. Yes.

7 Q. Is the John referred to in this email you?

8 MS. BOGGS: Objection, calls for
9 speculation, lack of foundation.

10 THE WITNESS: I'm going to presume
11 it is.

12 Q. (By Mr. O'Laughlin:) What was the bad ball
13 that Vincent started rolling?

14 MS. BOGGS: Objection, lack of
15 foundation, calls for speculation.

16 THE WITNESS: I have no idea.

17 Q. (By Mr. O'Laughlin:) When the First Lady
18 writes that you were going to speak with the AG when
19 he gets back, what is that referring to?

20 MS. BOGGS: Objection, lack of
21 foundation, calls for speculation,
22 mischaracterization.

23 THE WITNESS: I do not recall, but
24 if -- any discussion I would have had
25 with the AG on this matter, it would

1 have been the same I had with a lot of
2 my commissioners, which is --

3 MS. BOGGS: Objection to the -- I
4 instruct you not to answer to the extent
5 it involves legal information or seeking
6 legal advice with the attorney general.

7 MR. TEAGUE: You can answer.

8 THE WITNESS: Which is you can't
9 change your mind and say nothing to
10 someone.

11 Q. (By Mr. O'Laughlin:) What do you mean by
12 that?

13 A. If you disagree with a position, then tell
14 them you disagree with the position. You just can't
15 change your mind and not say a word. So any
16 discussion I had with Vincent or any one of my
17 commissioners would not be the substance of the bad
18 ball rolling. It would be if you don't agree and you
19 change your mind, then discuss it with them.

20 Q. What was the change of position that you
21 discussed with Attorney General Frazer?

22 A. I have no idea.

23 MS. BOGGS: Objection, lack of
24 foundation, calls for speculation.

25 THE WITNESS: I do not recall.

1 But clearly he made a decision he felt
2 comfortable with. I'm not going to try
3 to get him to change it. I'm going to
4 tell him, just communicate it.

5 Q. (By Mr. O'Laughlin:) You're going to tell
6 him what?

7 A. To communicate it.

8 Q. What do you mean by "to communicate it"?

9 A. Well, in the letter, what it says is that
10 that -- that he basically, he changed his mind and
11 said nothing. My position would be, you got to say
12 something. If you disagree with that position, say
13 you disagree with that position.

14 Q. So just to be clear, are you testifying
15 about an actual conversation that you had with the
16 attorney general?

17 A. I believe so.

18 Q. Okay. And what was that conversation?

19 A. Just --

20 MS. BOGGS: Objection. Again, I
21 am going to instruct the witness not to
22 reveal any communications with the
23 attorney general seeking or obtaining
24 legal advice.

25 MR. TEAGUE: You can answer.

1 THE WITNESS: To discuss it with
2 his attorney, to discuss with them
3 exactly why you changed your position.
4 But he did not discuss with me any
5 substance.

6 Q. (By Mr. O'Laughlin:) Changed his position
7 on what?

8 A. I have no idea. I'm going strictly by
9 this email.

10 Q. I'm asking if you have a recollection of a
11 conversation with the attorney general. Do you?

12 A. I recall a conversation with the attorney
13 general where he changed his position and he did not
14 communicate it to them. I told him to communicate to
15 them, them, meaning their lawyers, exactly why he
16 changed his position.

17 We had no discussion on the substance of
18 why he changed his position. Just that he needed to
19 be forthright and tell them the basis on the position
20 that he took.

21 Q. But the discussion you had with the
22 attorney general was about the SORNA legislation?

23 A. It was about his --

24 MS. BOGGS: Objection, calls for
25 speculation, lack of foundation. Also,

1 again, I'm going to instruct the witness
2 not to reveal the content of any
3 communications with the attorney general
4 involving legal advice.

5 THE WITNESS: Strictly based on
6 the position he took, why did he change
7 his position. Just communicate it to
8 them. There was no substance on the
9 discussion.

10 Q. (By Mr. O'Laughlin:) Was there anyone else
11 involved in this discussion?

12 A. Meaning, was there someone else in the
13 room with me?

14 Q. Yes.

15 A. No.

16 Q. Was it an in-person discussion?

17 A. No.

18 Q. Was it over the phone?

19 A. I recall, yes.

20 Q. Were there notes made of this discussion?

21 A. No.

22 Q. What was your reason for reaching out to
23 the attorney general to have this discussion?

24 MS. BOGGS: Objection, lack of
25 foundation.

1 THE WITNESS: Because if he agreed
2 on one issue and they thought he was
3 going to do something, to at least
4 correct it.

5 Q. (By Mr. O'Laughlin:) How did you know that
6 he had changed his position?

7 A. It had been mentioned.

8 Q. By who?

9 A. Cecile.

10 Q. So the First Lady mentioned to you that the
11 attorney general had changed his position on the SORNA
12 legislation, and then you followed up with a call to
13 the attorney general, correct?

14 MS. BOGGS: Objection, form.

15 THE WITNESS: She mentioned to me
16 that he had changed his position,
17 particularly on the issue, which I did
18 not go into with her. Just that he
19 changed his position.

20 And my position always has been if you're
21 going to change your position on the stance, you
22 have to notify the individuals you're dealing
23 with. You just can't change your position.

24 Q. (By Mr. O'Laughlin:) So the First Lady
25 came to you with the concern that he changed his

1 position, and you followed up by having a conversation
2 with the attorney general?

3 MR. TEAGUE: Objection, form.

4 THE WITNESS: Correct. Correct.

5 Q. (By Mr. O'Laughlin:) And telling him that
6 if he was going to change his position on the SORNA
7 legislation, he should relay that to the First Lady?

8 A. I don't know if it was a change on the
9 SORNA legislation or some aspect, but, yes, that he
10 should convey it to their counsel, yes.

11 Q. Do you know if the attorney general in
12 response to your call did have a follow-up
13 conversation?

14 A. I don't know.

15 MS. BOGGS: Objection, lack of
16 foundation, speculation.

17 (Discussion off the record.)

18 Q. (By Mr. O'Laughlin:) What was the attorney
19 general's response to your message to him that he
20 should convey any changes in his position?

21 MS. BOGGS: Objection. Again, I'm
22 going to instruct the witness not to
23 reveal any communications with the
24 attorney general that would involve
25 local advice.

1 THE WITNESS: I don't recall
2 specifically what he said.

3 Q. (By Mr. O'Laughlin:) Do you recall
4 generally?

5 MS. BOGGS: Same instruction.

6 THE WITNESS: It was a very short
7 conversation.

8 Q. (By Mr. O'Laughlin:) Did he agree with
9 you?

10 MS. BOGGS: Same instruction.

11 THE WITNESS: I don't recall.

12 Q. (By Mr. O'Laughlin:) You don't recall
13 whether he agreed with you or not?

14 MS. BOGGS: Same instruction.

15 THE WITNESS: Well, he did --

16 MS. BOGGS: Same instruction.

17 THE WITNESS: I don't recall
18 whether he said, Yes, I'll pick the
19 phone and call them, or that he said, He
20 would. It was just my telling him what
21 I thought he needed to do.

22 Q. (By Mr. O'Laughlin:) And what is it that
23 you thought he needed to do specifically?

24 MR. TEAGUE: Objection. Asked and
25 answered multiple times. You can answer

1 again.

2 THE WITNESS: Be very clear in his
3 position.

4 Q. (By Mr. O'Laughlin:) With who?

5 A. With their attorneys.

6 Q. Their attorneys being Epstein's attorneys?

7 A. Yes.

8 Q. Do you know if the First Lady was unhappy
9 with the outcome of the SORNA legislation?

10 MS. BOGGS: Objection, calls for
11 speculation, lack of foundation.

12 THE WITNESS: I do not.

13 Q. (By Mr. O'Laughlin:) Do you know if
14 Epstein was unhappy with the outcome of the SORNA
15 legislation?

16 MS. BOGGS: Objection, calls for
17 speculation, lack of foundation.

18 MR. TEAGUE: You can answer. Go
19 ahead.

20 THE WITNESS: I don't. I don't
21 know what his position was.

22 Q. (By Mr. O'Laughlin:) Were you involved in
23 any way with the follow-up by Epstein or his
24 associates following the sex offender legislation?

25 MS. BOGGS: Objection.

1 not want to do it via email or phone," correct?

2 A. That is correct.

3 Q. Do you have any knowledge as to why she
4 wouldn't want to put these discussions in email?

5 MS. BOGGS: Objection, calls for
6 speculation, lack of foundation.

7 THE WITNESS: No.

8 MR. O'LAUGHLIN: What time do you
9 want to stop?

10 MR. TEAGUE: Actually, if you're
11 starting a new topic, this would be a
12 good time.

13 MR. O'LAUGHLIN: Yeah. Okay.

14 VIDEOGRAPHER: Okay. We're going
15 off the record. The time is 2:16 p.m.,
16 Tuesday, May 30th, 2023. We're off the
17 record.

18 (Break taken.)

19 VIDEOGRAPHER: We are back on the
20 record, the time is 2:26 p.m., Tuesday,
21 May 30th, 2023. We're on the record.

22 Q. (By Mr. O'Laughlin:) Earlier you testified
23 that you were arrested in connection with a corruption
24 case against you, correct?

25 A. That is correct.

1 Q. What was the nature of the case?

2 A. It was an action brought against me by the
3 government of the V.I. because they thought I
4 illegally used government funds for security measures
5 at my house.

6 When I was elected governor in 2006, one
7 of the last items I had to think about, that I
8 thought that I did have to think about, was security.
9 But we made the decision to live in our home because
10 there's truly no government residence.

11 And where the previous governors had
12 lived was not an accommodation to fit my family. I
13 had three young children, an aunt we were taking care
14 of.

15 And to refurbish the place it would have
16 taken -- we had estimated at three and half -- two
17 and half to three million. So I thought it would be
18 better to live at home.

19 I had an AG's opinion, an acting
20 attorney general's opinions from Department of
21 Justice --

22 MS. BOGGS: Objection. I'm going
23 to instruct the witness not to testify
24 regarding any legal -- sorry -- legal
25 advice given to you by the attorney

1 general.

2 MR. TEAGUE: You can continue.

3 THE WITNESS: I'll continue, yes.

4 That it was okay to do it. So I went
5 through a process where we -- we did
6 procurement for government contracts
7 that involved working through the
8 Department of Property and Procurement,
9 got their approval, working through the
10 Department of Justice, and got their
11 legal sufficiency.

12 After it was done, after I was out of
13 office, the then sitting governor decided that
14 it was illegal. Had me arrested.

15 Q. (By Mr. O'Laughlin:) Who was the-then
16 sitting governor?

17 A. Kenneth Mapp.

18 Q. Does he have that authority as the governor
19 or would it have to go through the attorney general's
20 office?

21 A. Went through the attorney general's
22 office, an acting attorney general.

23 Q. Was Epstein involved at all in your
24 response to that lawsuit?

25 MS. BOGGS: Objection. Objection,

1 form.

2 THE WITNESS: I'm sorry, can you
3 be a little bit more specific?

4 Q. (By Mr. O'Laughlin:) Was Epstein involved
5 in your defense of the lawsuit?

6 A. Oh, in my defense? No. Not at all.

7 Q. Did he provide advice?

8 A. No.

9 Q. Did he provide any financial assistance in
10 connection with the lawsuit?

11 A. With the action itself or --

12 Q. Let's answer both. So in regards to the
13 action, the defense of the action itself, did he
14 provide assistance?

15 A. No, he didn't.

16 Q. Who paid for the defense of the case?

17 A. Cecile and myself.

18 Q. Personally?

19 A. Personally.

20 Q. And did funds come from any other source?

21 A. Came -- it came from my account.

22 Q. Okay. And then did he provide any other
23 type of financial assistance beyond defense of the
24 lawsuit?

25 A. Yes, he did.

1 Q. And what financial assistance did he
2 provide?

3 A. In order to settle the case, the
4 government -- I had paid the government -- we had an
5 appraisal done on the security enhancements that we
6 did.

7 And based on those appraisals, the
8 government decided without my input, that I needed to
9 pay them a certain amount, 181,000, which I did. The
10 government -- I gave them a check.

11 They then returned the check to me at
12 7:30 at night, and then the next day held a press
13 conference saying that I did not meet the obligations
14 of what I had agreed to do, and then had me arrested
15 a couple months later.

16 We then entered into negotiations as to
17 what it would take to drop the case and essentially
18 said you have to pay more.

19 So we came up and agreed on a number.
20 Once we agreed on that number, Mr. Epstein,
21 unsolicited by me, spoke to Cecile and said, how can
22 I help. And that's how he provided \$200,000.

23 Q. What was the total amount that was paid to
24 resolve the case?

25 A. About 381,000.

1 Q. So the initial amount, the actual cost of
2 improvements was 181,000?

3 A. No. That was the value that the
4 government said I owed after the depreciated value
5 over eight years.

6 Q. Okay. And then the ultimate amount paid
7 was 381,000. So they added 200,000 on to their
8 assessment of the value?

9 A. That's correct.

10 Q. Okay. And of the 381,000, Epstein financed
11 200,000?

12 A. He gave us a loan for 200,000.

13 Q. What were the terms of the loan?

14 A. That we had to pay it back -- we asked him
15 if we could have two years to pay it back. He said,
16 no, a year. So we paid it back early, mid '16, 2016,
17 and that was it.

18 Q. Was there interest accrued on the loan?

19 A. Yes, I don't recall the amount, but there
20 was interest on the loan.

21 Q. Do you recall what the rate was?

22 A. I do not.

23 Q. How was the rate determined?

24 A. I don't know. I don't know how they
25 negotiated the rate.

1 Q. Who negotiated the rate?

2 A. It would have been between Epstein's
3 office or Epstein and Cecile.

4 Q. And were you involved in those negotiations
5 at all?

6 A. I was not.

7 Q. How did Epstein first learn that you might
8 be in need of that financial assistance?

9 MS. BOGGS: Objection, foundation,
10 speculation.

11 THE WITNESS: I gather that he
12 kept abreast with Cecile about what was
13 happening with the case.

14 Q. (By Mr. O'Laughlin:) So the First Lady
15 relayed to him what was going on with the case and
16 then he volunteered to finance \$200,000 worth of the
17 ultimate amount?

18 MS. BOGGS: Objection, form.

19 MR. TEAGUE: Objection,
20 foundation. You can answer.

21 THE WITNESS: Yes.

22 Q. (By Mr. O'Laughlin:) Was he involved in
23 any other way in the case?

24 A. No.

25 Q. Did his team review legal filings in the

1 Q. Did you ask the First Lady to relay this
2 information to Epstein?

3 A. I must of.

4 Q. Were you involved in any discussions of a
5 \$50 million loan to the USVI government involving
6 Epstein?

7 A. When you say "discussions," please -- what
8 do you mean by discussions?

9 Q. What do you understand the word
10 "discussions" to mean?

11 A. Discussions, but with whom?

12 Q. Anyone.

13 A. I wasn't in any discussions, no.

14 Q. Did you have -- do you have any knowledge
15 of any \$50 million loan to the USVI government?

16 A. I was asked some questions, of which I
17 responded to those questions, yes.

18 Q. What were the questions you were asked?

19 A. Just if the government wanted to borrow,
20 could they. Was there a revenue stream? Could it be
21 collateralized? But there was no discussions. There
22 were just some questions.

23 Q. Why were those questions coming to you?

24 MS. BOGGS: Objection,
25 speculation. Lack of foundation.

1 THE WITNESS: I'm presuming just
2 based on my knowledge of government.

3 Q. (By Mr. O'Laughlin:) But this was after
4 you were out of office, correct?

5 A. I believe so.

6 Q. Okay. Who was asking the questions?

7 A. I'm not sure if it came from Cecile. I
8 think it may have come from Cecile.

9 Q. Okay. On behalf of Epstein?

10 A. I presume so.

11 Q. Okay. Do you know the approximate date of
12 these questions being asked to you?

13 A. No, I don't.

14 MR. O'LAUGHLIN: Let's enter tab
15 64.

16 (Deposition Exhibit No. 50 was
17 marked for identification.)

18 Q. (By Mr. O'Laughlin:) Exhibit 50. This is
19 an email chain that starts February 5, 2017, and
20 Epstein writes to the First Lady, "The government
21 needs 40 to 50 million for year. What does John think
22 would be the most viable collateral"?

23 Do you see that?

24 A. I do.

25 Q. Do you know where the government's need for

1 40 to \$50 million a year was coming from?

2 A. I do not.

3 Q. Did you ask?

4 A. I did not.

5 Q. And you said that you think this request
6 came to you because you had some particular expertise
7 in it?

8 A. I couldn't imagine any other reason.

9 Q. What was the expertise you had?

10 A. Well, not expertise. Knowledge.

11 Q. What was the knowledge you had?

12 A. Just what -- what could the government
13 provide as collateral. That's it.

14 Q. Did you take any steps in response to this
15 request?

16 A. No, I did not.

17 Q. So on February 6, 2017, the First Lady
18 writes, "I sent it to John for his response. He did
19 mention that the government has revenue generating
20 property in the Subbase area. He has asked a former
21 Property and Procurement employee for a list of
22 properties."

23 Is that right?

24 A. Right in terms of what you read or right
25 in terms of what I did?

1 Q. Right in terms of what I read.

2 A. Yes, it is.

3 Q. Is it right in terms of what you did?

4 A. No.

5 MS. BOGGS: Objection.

6 Q. (By Mr. O'Laughlin:) So the First Lady is
7 reporting back to Epstein's action that you took that
8 are not accurate?

9 A. No.

10 MS. BOGGS: Objection, form.

11 THE WITNESS: No. Not at all. I
12 did mention that the government has
13 revenue generating property, some in the
14 Subbase area. But I never went to a
15 former employee to ask because a list of
16 government properties is located online,
17 and also is in their budget. So I
18 didn't have to go to another employee to
19 ask.

20 Q. (By Mr. O'Laughlin:) So you never got a
21 list of government properties from anyone?

22 MR. TEAGUE: Objection, form.

23 THE WITNESS: I never got a list
24 that I shared with anyone, correct.

25 Q. (By Mr. O'Laughlin:) But did you obtain a

1 list?

2 A. Yes.

3 Q. You obtained a list and then you didn't
4 share it?

5 A. I didn't share it.

6 Q. Why did you obtain a list if you weren't
7 planning on sharing it?

8 A. Because the amount of time that it took
9 for me to get the list by going online, which is too
10 long. So I just never did anything with it, other
11 than tell them look at properties that the government
12 owns, which you could find that online.

13 Q. Did you provide any sort of response to
14 Epstein about what items might be available to secure
15 a \$50 million loan?

16 A. When you say "items," you mean properties?
17 Specific properties?

18 Q. Yes.

19 A. No, I did not.

20 MR. O'LAUGHLIN: Let's enter tab

21 65.

22 (Deposition Exhibit No. 51 was
23 marked for identification.)

24 Q. (By Mr. O'Laughlin:) This is a February 6,
25 2017 email from you where you write, "I don't believe