

EXHIBIT 10

In the Matter Of:

GOV. OF U.S. vs JPMORGAN CHASE BANK

1:22-cv-10904-UA

STACEY E. PLASKETT

May 09, 2023

Confidential



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UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED
STATES OF AMERICA,

Plaintiff,

v Case No. 1:22-cv-10904-UA

JPMORGAN CHASE BANK, N.A.,
Defendant,

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF

STACEY E. PLASKETT

Tuesday, May 9, 2023

9:00 a.m. EST

Reported by: Goldy Gold, RPR

Job No. J9647388

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STACEY PLASKETT - CONFIDENTIAL

Q. What was your book going to be?

09:23

A. It was going to be a historical book about earlier life, maybe a generation or so ago, in the Virgin Islands.

09:23

09:23

09:23

Q. And what was the law firm that you worked for initially?

09:23

09:24

A. I worked with Nichols Newman Logan.

09:24

Q. And how long were you with Nichols Newman Logan?

09:24

09:24

A. I was there until 2007.

09:24

Q. Which was how -- I didn't ask you actually when you first moved down?

09:24

09:24

A. I think I moved down in 2005, so approximately two years.

09:24

09:24

Q. Okay. And what kind of work were you doing at Nichols Newman for those two years?

09:24

09:24

A. Primarily transactional. And also in the Virgin Islands at that time, all attorneys did court-appointed work. Most of the lawyers in the firm were not courtroom attorneys, and so I did a lot of the courtroom appearances for the law firm.

09:24

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09:24

Q. Okay. And then 2007, you moved to a new job?

09:24

09:24

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2 A. Yes. 09:24

3 Q. What was that? 09:24

4 A. I was hired as the counsel for the 09:24

5 Virgin Islands Economic Development Authority. 09:25

6 (Court reporter clarification.)

7 BY MR. NEIMAN: 09:25

8 Q. What is the Virgin Islands Economic 09:25

9 Development Authority? 09:25

10 A. The Virgin Islands Economic 09:25

11 Development Authority is a semi-autonomous agency 09:25

12 in the Virgin Islands, which handles many 09:25

13 incentives to bring as well as grow businesses in 09:25

14 the territory through various vehicles: A 09:25

15 government development bank, which gives loans to 09:25

16 businesses, small businesses predominantly; a tax 09:25

17 incentive program under the U.S. code, which 09:25

18 allows businesses and individuals to receive tax 09:25

19 reductions on federal taxes for businesses and 09:25

20 employment that they bring to the territory. 09:25

21 Q. And you described this as a 09:25

22 semi-autonomous agency? 09:26

23 A. Correct. 09:26

24 Q. Can you explain what you meant by 09:26

25 that? 09:26

1 STACEY PLASKETT - CONFIDENTIAL

2 texts with him during your time at the Economic 10:48

3 Development Authority? 10:48

4 A. I do not recall. 10:48

5 Q. When do you think you first met 10:48

6 Mr. Epstein in person? 10:48

7 A. After leaving the Economic 10:48

8 Development Authority. 10:48

9 Q. How did that first meeting come 10:48

10 about, as best as you can recall? 10:48

11 A. Well, I was running for office. I 10:48

12 was, as individuals running for office do, 10:48

13 looking for contributors, donors. Erika 10:48

14 Kellerhals introduced me to Mr. Epstein as a 10:48

15 potential donor. 10:48

16 Q. At the time that you were introduced 10:48

17 -- withdrawn. 10:48

18 And where was the first meeting with 10:48

19 Mr. Epstein? 10:48

20 A. At his office in St. Thomas. 10:48

21 Q. Do you remember about how many times 10:48

22 you met with Mr. Epstein? 10:48

23 A. I do not recall. 10:49

24 Q. Do you think it was more than five 10:49

25 times? 10:49

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2 A. No. 10:49

3 Q. Where else did you meet with him 10:49
4 other than in his offices at St. Thomas? 10:49

5 A. I met him in his home in New York. 10:49

6 Q. Did you ever meet him on Little 10:49
7 Saint James? 10:49

8 A. No. 10:49

9 Q. About how many times were you at his 10:49
10 home in New York? 10:49

11 A. I believe one time. 10:49

12 Q. Okay. About how many times did you 10:49
13 meet with him in his office? 10:49

14 A. I would have to speculate -- in -- 10:49
15 office in St. Thomas? 10:49

16 Q. Yes. 10:49

17 A. I would have to speculate. 10:49

18 Q. More than once, do you believe? 10:49

19 A. Yes. 10:49

20 Q. But less than five times? 10:49

21 A. Yes. 10:49

22 Q. About how many times did you speak 10:49
23 to Mr. Epstein on the phone? 10:49

24 A. I did not recall. 10:49

25 Q. More than five times? 10:49

1 STACEY PLASKETT - CONFIDENTIAL

2 A. Yes. 10:49

3 Q. More than ten times? 10:49

4 A. I do not recall. 10:49

5 Q. What do you recall discussing with 10:49

6 him when you met him in person? 10:50

7 A. About my intentions -- the first -- 10:50

8 Q. Yeah. Let's start with the first 10:50

9 time. 10:50

10 A. Related to campaign contributions. 10:50

11 Q. In what way? 10:50

12 A. I cannot recall at that point in 10:50

13 time what the specifics were. 10:50

14 Q. Is it fair to say you were asking 10:50

15 for money? 10:50

16 A. Correct. 10:50

17 Q. Do you remember how much you asked 10:50

18 for? 10:50

19 A. I do not recall at that meeting if 10:50

20 the contribution was solely for myself. 10:50

21 Q. Ah. Who else might it have been 10:50

22 for? 10:50

23 A. The Democratic Party. 10:50

24 Q. Okay. So fair to say that, during 10:50

25 the course of your multiple discussions with 10:50

1 STACEY PLASKETT - CONFIDENTIAL

2 you were going to run for Congress again? 11:04

3 A. When I lost. 11:04

4 Q. Okay. And when you went to work for 11:04
5 the Kellerhals firm, how long did you work there? 11:04

6 A. I don't recall the time frame, but 11:04
7 it would have been 2013. 11:04

8 Q. I know that in the past, at least, 11:04
9 Ms. Kellerhals had done work for Mr. Epstein 11:04
10 and/or his companies. 11:04

11 Did you, while you were at the firm, 11:04
12 do any work for Epstein or any Epstein-related 11:04
13 businesses? 11:04

14 A. I don't recall. 11:04

15 Q. What kind of work did you do at the 11:04
16 firm? 11:04

17 A. Predominantly transactional for 11:04
18 companies that were in the Virgin Islands and for 11:04
19 a few advice related to the economic development. 11:05

20 Q. And I take it that Epstein and his 11:05
21 businesses remained a client of the Kellerhals
22 firm during the time that you were there; is that 11:05
23 fair? 11:05

24 A. Yes. 11:05

25 Q. All right. Let's talk about a 11:05

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2 A. I don't recall. 12:28

3 Q. Did you talk to Mr. Epstein about 12:28
4 this press release? 12:28

5 A. I don't recall. 12:28

6 Q. Just going back to the press release 12:28
7 for a moment. I'm sorry. 12:28

8 You'll see in the third paragraph, 12:28

9 there's a description of you having received 12:28

10 \$5,400 in two separate contributions from Epstein 12:28

11 on August 2nd, according to federal campaign 12:28

12 finance records, right? 12:28

13 A. Yes. 12:28

14 Q. And that was true, right? You had 12:28

15 gotten two donations from Mr. Epstein personally 12:28

16 on or about August 2nd of 2016? 12:29

17 A. Yes, totaling \$5,400. 12:29

18 Q. Okay. And that was -- so August 2nd 12:29

19 was about two weeks after the text exchange with 12:29

20 Erika about what building you should be going to 12:29

21 for a meeting with Mr. Epstein, right? That's 12:29

22 Exhibit 20? 12:29

23 A. State the date again? 12:29

24 Q. I said it's about two weeks after -- 12:29

25 A. Yes. 12:29

1 STACEY PLASKETT - CONFIDENTIAL

2 didn't want his name on the host committee? 02:13

3 A. I learned that he donated to the 02:13

4 campaign. 02:13

5 Q. Did you learn that he didn't want 02:13

6 his name included on the invitation? 02:13

7 A. I don't recall at that point. 02:13

8 Q. Did you want his name on your 02:13

9 invitation? 02:13

10 A. I don't recall expressing an 02:13

11 opinion. 02:13

12 Q. Yeah. And I'm asking a slightly 02:13

13 different question, not so much whether you 02:13

14 recall expressing an opinion. 02:13

15 But in 2018, did you think having 02:13

16 Jeffrey Epstein's name on your campaign 02:13

17 invitations would be a good idea? 02:13

18 A. I don't recall. 02:13

19 Q. Do you remember meeting with 02:13

20 Mr. Epstein in the fall of 2018? 02:13

21 A. I don't recall. 02:13

22 Q. Do you remember -- you testified 02:13

23 before that you thought you had met with him at 02:14

24 his home once in New York? 02:14

25 A. Yes. 02:14

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2 Q. Tell me about his home. What do you 02:14
3 remember about him? 02:14

4 A. I remember it being off of Lexington 02:14
5 Avenue. I recall going to the address, ringing 02:14
6 the bell, someone coming from outside which I 02:14
7 assumed to be a security person. 02:14

8 Q. Uh-huh.

9 A. Someone opening the door, coming 02:14
10 into a large foyer area, meeting Lesley Groff, 02:14
11 telling me that he would be with me. Walking 02:14
12 through an even larger foyer stairwell area to a 02:14
13 room immediately there that would appear to be a 02:14
14 dining room, where he was sitting at a very long 02:14
15 table having a conversation with another 02:15
16 gentleman. Wrapping up the conversation, that 02:15
17 person leaving -- making introductions, that 02:15
18 person leaving, and me sitting down and having a 02:15
19 conversation with him. 02:15

20 Q. Do you remember who the other person 02:15
21 was who was there meeting with Mr. Epstein? 02:15

22 A. I don't recall the person's name. 02:15

23 Q. Were there any women present in the 02:15
24 home when you visited? 02:15

25 A. Other than Ms. Groff, no. 02:15

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2 Q. Did you ever hear that when 02:15

3 Mr. Epstein traveled to the Virgin Islands, he 02:15

4 often had young women with him? 02:15

5 A. What time frame are you asking me 02:15

6 did I know? 02:15

7 Q. Ever. 02:15

8 A. Yes. 02:15

9 Q. When do you recall? 02:15

10 A. I don't recall the exact time of 02:16

11 hearing that. 02:16

12 Q. Do you think it was before or after 02:16

13 September of 2018? 02:16

14 A. I don't recall. 02:16

15 Q. So it could have been earlier than 02:16

16 that? 02:16

17 A. It could have. 02:16

18 Q. Okay. So what happened -- how long 02:16

19 was your meeting with Mr. Epstein at his home? 02:16

20 A. I don't recall. 02:16

21 Q. Was it more than an hour? 02:16

22 A. No. 02:16

23 Q. Okay. Half an hour, roughly? 02:16

24 A. Potentially. 02:16

25 Q. What do you recall talking about? 02:16

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2 A. Virgin Islands' politics, national 02:16
3 politics, campaign contribution. 02:16

4 Q. Okay. Do you remember what your ask 02:16
5 was? 02:16

6 A. No. 02:16

7 Q. Were you trying to raise money for 02:16
8 the DCCC at this time? 02:17

9 A. I think I was always trying to raise 02:17
10 money for the Democratic Congressional Campaign 02:17
11 Committee. 02:17

12 Q. That's one of the jobs of being a 02:17
13 Democratic congressperson, correct? 02:17

14 A. Yes. 02:17

15 Q. And you had a total of \$250,000 that 02:17
16 you were supposed to try to raise? 02:17

17 A. Members of Congress, based upon 02:17
18 their seniority and committee assignments, have 02:17
19 dues as well as raise amounts that are requested. 02:17

20 Q. And do you recall yours being around 02:17
21 \$250,000 in this time period? 02:17

22 A. I don't recall at that time period 02:17
23 what it was, but that does not sound 02:17
24 unreasonable. 02:17

25 Q. It does not sound unreasonable? 02:17

1 STACEY PLASKETT - CONFIDENTIAL

2 A. No. 02:17

3 Q. Okay. And that's a lot of money? 02:17

4 A. Yes. 02:17

5 Q. So who were your prospects for 02:17

6 raising that kind of money? 02:17

7 A. Individuals who had donated before, 02:17

8 alumni, individuals who were interested in the 02:17

9 same topics for which committees I sat on, other 02:18

10 Democratic donors throughout the country, 02:18

11 et cetera. 02:18

12 Q. Was Mr. Epstein on that list of 02:18

13 people who would be a potential help in raising 02:18

14 money for the DCCC? 02:18

15 A. Yes. 02:18

16 Q. Did you ask him to contribute to 02:18

17 that? 02:18

18 A. Yes. 02:18

19 Q. Was that part of what was discussed 02:18

20 at this meeting in September? 02:18

21 A. I don't recall if it's that 02:18

22 specific, but it's possible, yes. 02:18

23 Q. Are there limits to the amount that 02:18

24 any individual can donate to the DCCC? 02:18

25 A. Yes. 02:18

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2 Q. What are the limits? 02:18

3 A. At that time, I believed an 02:18

4 individual could give over 30,000. I can't 02:18

5 remember the exact amount, but it was in the 02:18

6 range of 30,000. 02:18

7 Q. How much did you ask Mr. Epstein to 02:18

8 give? 02:18

9 A. To the maximum, whatever that 02:18

10 maximum was. 02:19

11 Q. Okay. How do you get somebody to 02:19

12 give that much money? 02:19

13 A. You ask them. 02:19

14 Q. Okay. Did Mr. Epstein ever ask for 02:19

15 anything from you? 02:19

16 A. No. 02:19

17 MR. NEIMAN: Let me know mark now as 02:19

18 Plaskett Exhibit 40, a one-page text 02:19

19 exchange. 02:20

20 [Exhibit 40, September 2018 text 02:20

21 exchange, was marked for identification.] 02:20

22 BY MR. NEIMAN: 02:20

23 Q. All right. Ms. Plaskett, I've 02:20

24 handed you Exhibit 40, which is a text exchange 02:20

25 between you and Jerome, your chief of staff, in 02:20

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STACEY PLASKETT - CONFIDENTIAL

September of 2018. Do you see that?

A. Yes.

Q. And what is it that Mr. Murray is sending you? What is that a picture of? Can you tell?

A. That is a picture of me. I think that is me sending to him.

Q. Oh, I'm sorry. What are you sending him?

A. A call list.

Q. What is a call list?

A. A list of individuals to call to ask for money, either for myself or the Democratic Party.

Q. Got it. And you're sending that to him for what reason?

A. So he can be apprised of who I have called and who I have not called and to harass me about calling the ones that have not been called.

Q. Got it. And then you're telling him in the next text down, at 11:11 p.m., that you're going to have a meeting with Mr. Epstein when you arrive in New York?

A. Yes.

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1 STACEY PLASKETT - CONFIDENTIAL

2 Q. That's the meeting that we've been 02:21
3 talking about? 02:21

4 A. Yes. 02:21

5 Q. Okay. Does the name Thorbjon 02:21
6 Jagland mean anything to you? 02:22

7 A. No, I don't recall a name like that. 02:22

8 COURT REPORTER: Can you spell that
9 on the record?

10 MR. NEIMAN: 02:22

11 T-h-o-r-b-j-o-n, J-a-g-l-a-n-d. 02:22

12 THE WITNESS: If I could see it? 02:22

13 BY MR. NEIMAN:

14 Q. Yes, sure. I'll show it to you. 02:22

15 This is... 02:22

16 COURT REPORTER: Can you state what
17 exhibit it will be?

18 MR. NEIMAN: 72. 02:22

19 MR. ACKERMAN: 41. 02:22

20 MR. ECKARD: 41.

21 MR. NEIMAN: Oh, sorry. Yes. It's
22 my Binder 72, your Exhibit 41.

23 [Exhibit 41, Groff, Epstein email 02:22

24 exchange, was marked for identification.] 02:22

25 BY MR. NEIMAN: 02:22

1 STACEY PLASKETT - CONFIDENTIAL

2 Q. All right. And you can see, 02:22
3 Ms. Plaskett, that Exhibit 41 us an email from 02:23
4 Ms. Groff to Mr. Epstein giving his schedule for 02:23
5 the day. Do you see that? 02:23

6 A. Yes.

7 Q. And the person immediately before
8 you on this schedule is this name, Thorbjon
9 Jagland. So I was just asking if that refreshed 02:23
10 your recollection at all about who it was that 02:23
11 you were introduced to when you met with 02:23
12 Mr. Epstein? 02:23

13 A. It possibly could be. As I stated, 02:23
14 they were in the dining room when I arrived. 02:23

15 Q. I could show you a quick picture. 02:23

16 MR. ACKERMAN: If I can mark it on 02:23
17 the record. 02:23

18 MR. NEIMAN: It's not that 02:23
19 important. 02:23

20 Okay. Let's take a look now at the next 02:23
21 exhibit which will be Plaskett Exhibit 42. 02:24

22 [Exhibit 42, Plaskett, Murray email 02:24
23 exchange, was marked for identification.] 02:24

24 BY MR. NEIMAN: 02:24

25 Q. All right. So Exhibit 42 is an 02:24

1 STACEY PLASKETT - CONFIDENTIAL

2 email exchange between Mr. Murray and you, 02:24

3 correct? 02:24

4 A. Yes. 02:24

5 Q. And this is a follow-up to the 02:24

6 meeting with Jeffrey Epstein that we've just been 02:24

7 talking about; fair? 02:24

8 A. Yes. 02:24

9 Q. This is an email that Mr. Murray is 02:25

10 drafting for the purposes of sharing with Erika 02:25

11 so that she can pass it on to Mr. Epstein? 02:25

12 A. I don't know who the email was to. 02:25

13 Q. Well, you'll see that Ms. Plaskett 02:25

14 writes -- that you write -- excuse me. 02:25

15 Withdrawn. 02:25

16 Yeah. You'll see that you, in the 02:25

17 top email on the page, say: "This looks fine. 02:25

18 Please send the email to Erika." Do you see 02:25

19 that? 02:25

20 A. Yes. 02:25

21 Q. So you're instructing Mr. Murray to 02:25

22 send this email that he's drafted to Erika, 02:25

23 correct? 02:25

24 A. Yes. 02:25

25 Q. And for her to pass this on to 02:25

1 STACEY PLASKETT - CONFIDENTIAL

2 Jeffrey Epstein, right? 02:25

3 A. Yes. I believe I'm instructing 02:25
4 Jerome to send it to Erika and to let her know 02:25
5 about the conversation I had with him about it. 02:25

6 Q. With the idea that she would then 02:25
7 reach out to Mr. Epstein to arrange the 02:25
8 contribution? 02:25

9 A. Yes. 02:25

10 Q. And do you recall that the DCCC 02:25
11 rejected Mr. Epstein's contribution? 02:26

12 A. Yes. 02:26

13 Q. Tell me what you remember about 02:26
14 that. 02:26

15 A. To the best of my recollection, I 02:26
16 recall that I was informed by my chief of staff 02:26
17 that the DCCC informed him that Mr. Epstein's 02:26
18 contribution would not be accepted by the DCCC. 02:26

19 Q. What did you do when you heard that? 02:26

20 A. I'm not sure who -- if I can recall 02:26
21 who I reached out to at that point to inform. 02:26

22 Q. Okay. Did you do anything to try to 02:26
23 find out why the Democratic Congressional 02:26
24 Campaign Committee had rejected Mr. Epstein's 02:26
25 donation? 02:26

1 STACEY PLASKETT - CONFIDENTIAL

2 A. I don't recall if it was already 02:26
3 expressed to me in his letting me know that it
4 was denied or if I got additional information. I 02:26
5 don't recall. 02:27

6 Q. Do you recall what you learned was 02:27
7 the reason why the DCCC would not accept 02:27
8 Mr. Epstein's contribution? 02:27

9 A. Yes. 02:27

10 Q. What was that? 02:27

11 A. That he had not passed their 02:27
12 vetting. 02:27

13 Q. What did you understand that to be a 02:27
14 reference to? 02:27

15 A. I did not know the specifics of what 02:27
16 that vetting was. 02:27

17 Q. Did you assume that it related to 02:27
18 his status as a sex offender? 02:27

19 MR. ECKARD: Object to form. 02:27

20 THE WITNESS: I was not sure of the 02:27
21 totality of the circumstances. 02:27

22 BY MR. NEIMAN: 02:27

23 Q. Did learning that the DCCC had 02:27
24 declined to accept Mr. Epstein's contribution 02:27
25 because he had not passed their vetting cause you 02:27

1 STACEY PLASKETT - CONFIDENTIAL

2 record at 4:21. 04:22

3 BY MR. NEIMAN: 04:22

4 Q. All right. Congresswoman, this 04:22
5 won't take too much longer. 04:22

6 MR. NEIMAN: I'm going to hand you a 04:22
7 document that's marked as Plaskett 04:22
8 Exhibit 54. 04:22

9 [Exhibit 54, 2014 to 2020 donor 04:22
10 list, was marked for identification.] 04:22

11 MR. ECKARD: Counsel, this one 04:22
12 doesn't have a Bates number. Was it 04:22
13 produced? 04:22

14 MR. NEIMAN: Yes. This was produced 04:22
15 as a native. 04:22

16 BY MR. NEIMAN: 04:22

17 Q. So, Congresswoman, you were asked 04:22
18 some questions about the number of donors that 04:22
19 you have and the like by Mr. Ackerman, and I just 04:22
20 want to show you your actual list that you 04:22
21 produced of your donors, at least from the 2014 04:22
22 cycle through the 2020 cycle. Okay? 04:22

23 Do you see that? 04:23

24 A. Yes. 04:23

25 Q. And what we've done is we've 04:23

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STACEY PLASKETT - CONFIDENTIAL

highlighted the particular individuals on this list who are either Epstein or Epstein-affiliated persons who made contributions to your campaign in those cycles. Okay?

A. I'm looking through it.

Q. Yes. Let me know when you're ready.

A. Okay. Yes.

Q. And you can see on page 3 that Mr. Epstein appears as a donor, and that his lifetime total to your campaigns for the 2014 through 2020 campaign cycles was \$8,100 personally, correct?

A. I see that number, yes.

Q. And then if you look at the next page, you can see that Lesley Groff, who you corresponded with in connection with Mr. Epstein, also donated to your campaign?

A. Yes.

Q. And she donated 2,600. Do you see that?

A. Yes, I see that.

Q. And then if you look at the next page after that, you can see that Darren Indyke, who we saw was the person who presented on behalf

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1 STACEY PLASKETT - CONFIDENTIAL

2 of FTC, seeking a tax -- extension of tax breaks 04:24

3 from the development authority while you were 04:24

4 there, gave \$10,700 to your campaign. 04:24

5 Do you see that? 04:24

6 A. Yes. 04:24

7 Q. And that Mr. Kahn, who is also 04:24

8 associated with Mr. Epstein, gave \$10,700 to your 04:24

9 campaign as well. 04:24

10 Do you see that? 04:24

11 A. Okay. I see. 04:24

12 Q. And that Bella Klein, who is 04:25

13 described in this document as Darren Indyke's 04:25

14 administrative assistant, also donated \$2,600 to 04:25

15 your campaign? 04:25

16 A. I see that. 04:25

17 Q. So across those five people, there's 04:25

18 total donations in excess of \$30,000, correct? 04:25

19 A. I'm adding that up. That sounds 04:25

20 correct. 04:25

21 Q. Did you have any other contributor 04:25

22 who donated either directly themselves, or by 04:25

23 themselves, and with a group of people associated 04:25

24 with them, more than \$30,000? 04:25

25 MR. ACKERMAN: Objection to form. 04:25

1 STACEY PLASKETT - CONFIDENTIAL

2 CERTIFICATE OF REPORTER/NOTARY PUBLIC

3
4 I, Goldy Gold, a Notary Public within and for
5 the State of New York and for the District of
6 Columbia, do hereby certify that the within-named
7 witness personally appeared before me at the time and
8 place herein set out, and after having been duly
9 sworn by me, according to the law, was examined by
10 counsel.

11 I further certify that the examination was
12 recorded stenographically by me and this transcript
13 is a true record of the proceedings.

14 I further certify that I am not of counsel to
15 any of the parties, nor in any way interested in the
16 outcome of this action.

17 As witness my hand and notarial seal this
18 10th day of April, 2023.

19 

20 _____
GOLDY GOLD, RPR
Notary Public

21
22
23 My Commission for the State of New York Expires:
January 27, 2026

24 My Commission for the District of Columbia Expires:
25 February 29, 2028