

# **EXHIBIT 25**

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

GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS,

Plaintiff,

v,

No. 22-cv-10904-JSR

JPMORGAN BANK, N.A.,

Defendant.

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JPMORGAN CHASE BANK, N.A.,  
Third-Party Plaintiff

v.

JAMES EDWARD STALEY,  
Third-Party Defendant.

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THE ORAL DEPOSITION OF ALBERT BRYAN, JR. was taken on the 6th day of June, 2023, at the Law Offices of Joel Holt, 2132 Company Street, Christiansted, St. Croix, U.S. Virgin Islands, between the hours of 8:42 a.m. and 3:47 p.m. pursuant to Notice and Federal Rules of Civil Procedure.

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Reported by:

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

1 (Deposition Exhibit No. 4 was  
2 marked for identification.)

3 A. Yes.

4 Q. And Reuters is not a tabloid, right?

5 A. Right.

6 Q. It's the kind of source you would read?

7 A. Right.

8 Q. All right. And you see what this is  
9 reporting on the Guilty plea to a felony by  
10 Mr. Epstein, right?

11 A. Yes.

12 Q. All right. And you'll see in the fourth  
13 paragraph of the article, it says that the "Guilty  
14 plea is the latest twist in a case stemming from a  
15 lengthy probe by Palm Beach police that reputed  
16 billionaire paid several girls under 18 in return for  
17 naked massages in his Palm Beach home that sometimes.  
18 Involved alleged sexual assaults," you see that?

19 A. Yes.

20 Q. Serious stuff, right?

21 A. This is.

22 Q. Do you recall about knowing about these  
23 allegations at the time that you voted to approve his  
24 EDC extension?

25 A. Like I said, I was only aware that he

1 copped a plea to having sex with a hooker who was  
2 under age.

3 Q. All right. You're saying you were not  
4 aware that he was alleged to have paid several girls  
5 under 18 in return for naked massages?

6 A. I may have been aware.

7 Q. Were you aware that those massages  
8 sometimes involved alleged sexual assaults?

9 A. No.

10 Q. So that fact published by Reuters -- or  
11 that allegation that had been published by Reuters in  
12 June of 2008, was not something that you learned or  
13 knew when you were voting to extend the benefits to  
14 Mr. Epstein in 2009?

15 A. Not particularly, no.

16 Q. Okay. Did you ever hear the reporter named  
17 Wayne Barrett was looking into the extension of  
18 benefits to Mr. Epstein?

19 A. Not to my knowledge.

20 Q. Okay. Would you have expected if an  
21 investigative reporter was looking into the actions of  
22 the EDC while you were the chair, that people at the  
23 EDC would have brought that to your attention?

24 MR. ACKERMAN: Object to form.

25 THE WINESS: I don't know. I'm

1 Q. How did you learn that Jeffrey Epstein had  
2 been arrested again?

3 A. Probably in the papers, TV or some kind of  
4 media.

5 Q. What did you do?

6 MR. ACKERMAN: Objection to form.

7 THE WITNESS: Nothing.

8 Q. (By Mr. Neiman:) Did you ever learn what  
9 the new charges were?

10 A. I wasn't really interested, you know, to  
11 tell you the truth.

12 Q. Okay. Let's take a look at -- do you  
13 remember having conversation with somebody named  
14 Richard Motta?

15 A. Richard is my director of Communications.

16 Q. Do you remember having communications with  
17 Mr. Motta about what to do about press inquiries  
18 related to Jeff Epstein after the news of his 2019  
19 arrest?

20 MR. ACKERMAN: Objection to form.

21 THE WITNESS: Vaguely.

22 Q. (By Mr. Neiman:) What do you remember?

23 A. I remember having my director of  
24 Communications. So, I mean, something like that, he  
25 would definitely, if he gets press inquiries, he

1       seen this article at the time it came out?

2           A.     No.

3           Q.     Why not?

4           A.     I mean, I'm not particularly, you know --  
5       I wasn't following the Epstein thing, to be quite  
6       honest.

7           Q.     You see in the second page of the article,  
8       it reads, "While at least one individual has said in a  
9       civil lawsuit in New York that she was sexually abused  
10      at Epstein's home on Little St. James."

11          A.     Yes.

12          Q.     That would be a topic of interest to you,  
13      wouldn't it?

14          A.     (Witness reading article.) Yes.

15          Q.     You don't remember learning that in July of  
16      2019?

17          A.     No, I don't. I remember the attorney  
18      general making a public statement that said, None of  
19      these victims were from the Virgin Islands. That's  
20      what I remember. At that point, I turned my  
21      attention elsewhere.

22                   MR. ACKERMAN: Still want to take  
23      a break?

24                   THE WITNESS: You were saying  
25      after the document.