



January 9, 2024

**VIA ECF**

The Honorable Loretta A. Preska  
District Court Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: ***Giuffre v. Maxwell, Case No. 15-cv-7433-LAP***

Dear Judge Preska,

Pursuant to the Court's December 18, 2023, unsealing order, and following conferral with Defendant, Plaintiff files this set of documents ordered unsealed. This filing also excludes documents pertaining to Does 105 (*see* December 28, 2023, Email Correspondence with Chambers), 107, and 110 (*see* ECF No. 1319), while the Court's review of those documents is ongoing. This is the last set of documents to be filed pursuant to the Court's December 18, 2023, order.

Respectfully,

/s/ Sigrid S. McCawley

Sigrid S. McCawley

cc: Counsel of Record (via ECF)

# EXHIBIT 6

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

\*\*CONFIDENTIAL\*\*

Videotaped deposition of GHISLAINE  
MAXWELL, taken pursuant to subpoena, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, 575 Lexington  
Avenue, New York, New York, commencing  
April 22, 2016, 9:04 a.m., on the above  
date, before Leslie Fagin, a Court  
Reporter and Notary Public in the State  
of New York.

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MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026



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APPEARANCES:

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LAURA A. MENNINGER, ESQUIRE

Also Present:

James Christe, videographer

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THE VIDEOGRAPHER: We are now on the record and recording. This begins disk No. 1 in the deposition of Ghislaine Maxwell in the matter of Virginia Giuffre versus Ghislaine Maxwell in the U.S. District Court for the Southern District of New York.

Today is April 22, 2016 the time is 9:04 a.m.. This deposition is being taken at 575 Lexington Avenue in New York at the request of Sigrid McCawley of Boies Schiller & Flexner.

The videographer is James Christe and the court reporter is Leslie Fagin. Will counsel state their appearance and whom they represent and then court reporter swear in Ms. Maxwell.

MS. McCAWLEY: My name is Sigrid McCawley with my colleague Meredith Schultz. We are with Boies Schiller & Flexner. We represent Ms. Giuffre.

MR. EDWARDS: Brad Edwards. I also represent Ms. Giuffre.

MR. CASSELL: Paul Cassell, I also

1 G Maxwell - Confidential

2 represent Ms. Giuffre.

3 MR. PAGLIUCA: Jeff Pagliuca and

4 Laura Menninger on behalf of Ms.

5 Maxwell.

6 G H I S L A I N E M A X W E L L, called

7 as a witness, having been duly sworn by a

8 Notary Public, was examined and testified as

9 follows:

10 EXAMINATION BY

11 MS. McCAWLEY:

12 Q. Good morning. I'm going to explain

13 some of the rules that will happen with

14 respect to depositions.

15 Have you ever been deposed before?

16 A. I have not.

17 Q. What is going to happen here, we

18 have a court reporter and a videographer.

19 What they do is take down the words that we

20 say so when I ask you a question they will

21 record what you say in response to that. So

22 we have to be mindful that in order for them

23 to do their job we can't talk over each

24 other.

25 Another issue you have to be weary

1 G Maxwell - Confidential  
2 of is that in a response, you can't give a  
3 nonverbal response, in other words, nodding a  
4 yes or no, they need to hear verbal response  
5 so they can record it on their transcript.  
6 So that's important for you to remember as we  
7 go through the day. If you forget, I will be  
8 sure to remind you.

9 Is there anything that would  
10 prevent you from giving truthful testimony  
11 today?

12 A. There is not.

13 Q. You are not on any medications or  
14 anything that would inhibit your ability to  
15 remember or give truthful testimony?

16 A. I am not.

17 MR. PAGLIUCA: Could you identify  
18 the assistant in the room.

19 MS. McCAWLEY: This is Emma Rosen  
20 from our New York office. She is a  
21 paralegal.

22 Q. Ms. Maxwell, can you please state  
23 your address for the record?

24 A. Currently [REDACTED]

25 Q. What is your date of birth?

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2 A. [REDACTED]

3 Q. When did you first recruit a female  
4 to work for Mr. Epstein?

5 MR. PAGLIUCA: I object to the form  
6 and foundation of the question. I  
7 believe this is confidential  
8 information. I ask anyone who is not  
9 admitted in this case be excused from  
10 the room, please.

11 MS. McCAWLEY: So the response to  
12 that question would --

13 MR. PAGLIUCA: The subject matter  
14 of this question is confidential and I'm  
15 designating it as confidential.

16 MS. McCAWLEY: I just want to make  
17 that clear for the record.

18 MR. EDWARDS: So we don't delay the  
19 deposition I will step out of the room  
20 but I think it's important to lay the  
21 record that --

22 MR. PAGLIUCA: I'm sorry, you are  
23 not admitted in this proceeding so you  
24 are not entitled to make any record. If  
25 Ms. McCawley wants to make a record she



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2 can.

3 MR. EDWARDS: I can make a record  
4 right now.

5 MR. PAGLIUCA: Maybe we should get  
6 the judge on the phone and talk about  
7 it.

8 MR. EDWARDS: The record will be  
9 short. This is the precise reason why  
10 Ms. Giuffre wants me in this case and  
11 I'm unable to effectively represent her  
12 at this time because I am unable to have  
13 access to the confidential information  
14 which includes apparently the entire  
15 deposition of Ms. Maxwell. But for the  
16 sake of not further delaying this, I  
17 will be outside the room.

18 MS. McCAWLEY: Thank you.

19 A. I would like to just -- wait for  
20 him to leave.

21 Q. That's fine.

22 A. I would just like to clarify the  
23 address. I'm in the process of selling the  
24 house so while while I still receive mail  
25 there, it's not my actual physical address.

1 G Maxwell - Confidential

2 It's in the process of being sold. It still  
3 requires some final paperwork to be done, so  
4 just for the purposes of clarity.

5 Q. Do you have a new address where you  
6 will be living?

7 A. I do not.

8 Q. For the purpose of the record, if  
9 there is something I ask you that you later  
10 remember something else or need to correct  
11 your testimony in some way, you can do that,  
12 just let me know what it is and we will go  
13 back to that question and can you clarify.

14 A. Of course. I just wanted to be  
15 clear, there is still some paperwork pending  
16 for final release, but it's in the process of  
17 sale. But I don't have another address  
18 currently, so whilst that should still be of  
19 record that the mail could be forwarded  
20 there, so for purposes of clarity I wanted to  
21 be clear.

22 Q. I appreciate that.

23 So Ms. Maxwell, when did you first  
24 recruit a female to work for Mr. Epstein?

25 MR. PAGLIUCA: Again. I object to

1 G Maxwell - Confidential

2 form and foundation of the question.

3 Q. You can answer the question.

4 A. First of all, can you please  
5 clarify the question. I don't understand  
6 what you mean by female, I don't understand  
7 what you mean by recruit. Please be more  
8 clear and specific about what you are  
9 suggesting.

10 Q. Are you a female, is that the sex  
11 that you are?

12 A. I am a female.

13 Q. That's what I'm referring to a  
14 female and I'm asking you when you first, the  
15 very first time you recruited a female to  
16 work for Mr. Epstein?

17 A. Again, I don't understand what  
18 female -- I am a 54 year old women.

19 Q. I'm not making it age, any age of a  
20 female that you recruited to work for Mr.  
21 Epstein?

22 A. Again, I was somebody who hired a  
23 number of people to work for Mr. Epstein and  
24 hiring is one of my functions.

25 Q. And when is the first time you

1 G Maxwell - Confidential

2 hired someone to work for Mr. Epstein, a  
3 female?

4 A. As best as I can recollect, a woman  
5 the age probably of about 40 or 50 was in  
6 sometime in 1992.

7 Q. How long did you work for Mr.  
8 Epstein?

9 A. I started working for him at some  
10 point in 1992 and the nature of my work  
11 relationship with him changed over time so  
12 from around 2002, 2003, the work lessened  
13 considerably.

14 Q. When did you --

15 MR. PAGLIUCA: Can I interject for  
16 a moment. If we are talking about  
17 background --

18 MS. McCAWLEY: I'm in the middle of  
19 a question. Let me finish it and then  
20 can you interject.

21 Q. When you say 2002 to 2003 that the  
22 work lessened, when did you complete working  
23 for Mr. Epstein; when was the last time you  
24 were employed by him, the last date?

25 A. I believe I still was doing --

1 G Maxwell - Confidential  
2 helping him in a very nominal way, maybe an  
3 hour or two a year at sometime 2008 and 2009.

4 MR. PAGLIUCA: So if you are going  
5 to be talking about general background,  
6 I don't need to designate that as  
7 confidential. So if you want to have  
8 them come back in, that's fine.

9 I assumed by your first question  
10 you were going into more sensitive  
11 areas. I will leave it up to you, but  
12 if this is general background it will  
13 not be designated as confidential.

14 MS. McCAWLEY: I appreciate that.  
15 I will jump back into my other  
16 questions.

17 MR. PAGLIUCA: So we will keep it  
18 as confidential.

19 Q. When you were first employed by him  
20 in 1992, what were you hired to do?

21 A. First, I was consulting and what I  
22 did was I helped with decorating houses and  
23 in hiring staff to help run those houses.

24 Q. Did your duties change over the  
25 course of 1992 to 2009?

1 G Maxwell - Confidential

2 MR. PAGLIUCA: Object to the form  
3 and foundation.

4 A. My job entailed running the homes  
5 that he had but much more importantly, most  
6 of the houses had construction and so whilst  
7 in 1992 there was no construction project,  
8 there was construction projects that began  
9 after that time and I was in charge not only  
10 of hiring architects, I was also in charge of  
11 all the filings or overseeing that, like a  
12 general contractor would.

13 I also helped with hiring the  
14 architects, hiring the builders, reviewing  
15 the contracts for the builders, coordinating  
16 the building projects, coordinating how the  
17 projects would layout, the timing of the  
18 projects and all the various materials that  
19 they would require to run a very substantial  
20 building project. That's the nature of the  
21 job I was dealing with.

22 Q. How old was the youngest female you  
23 ever hired to work for Jeffrey?

24 MR. PAGLIUCA: Object to the form  
25 and foundation.

1 G Maxwell - Confidential

2 Q. You can answer.

3 A. I have not any idea exactly of the  
4 youngest adult employee that I hired for  
5 Jeffrey.

6 Q. When you say adult employee, did  
7 you ever hire someone that was under the age  
8 of 18?

9 A. Never.

10 Q. Did you ever bring someone who was  
11 under -- invite someone under the age of 18  
12 to Jeffrey's home, any of his homes?

13 MR. PAGLIUCA: Object to the form  
14 foundation.

15 A. Can you repeat the question?

16 Q. Did you ever invite anybody who was  
17 under the age of 18 to Jeffrey's homes?

18 MR. PAGLIUCA: Same objections.

19 A. I have a number of friends that  
20 have children and friends of mine that have  
21 kids and in the invitation of my friends and  
22 their kids, I'm sure I may have invited some  
23 of my friend's kids to come.

24 Q. Anybody that is not a friend of  
25 yours.

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2 Any female under the age of 18, did  
3 you invite them to come to Jeffrey's home?

4 MR. PAGLIUCA: Object to the form  
5 and foundation.

6 A. Again, as I said, I am not aware of  
7 inviting anybody other than friends of mine  
8 who have children to the house.

9 Q. Did you invite Virginia Giuffre to  
10 come to Jeffrey Epstein's home when she was  
11 under the age of 18?

12 MR. PAGLIUCA: Object to the form  
13 and foundation.

14 A. Virginia Roberts held herself out  
15 as a masseuse and invited herself to come and  
16 give a massage.

17 Q. My question is, did you invite  
18 Virginia Roberts when she was under the age  
19 of 18 to come to Jeffrey Epstein's home?

20 MR. PAGLIUCA: Object to the form  
21 and foundation.

22 A. Again, Virginia Roberts was a  
23 masseuse --

24 Q. I'm asking not asking if she was a  
25 masseuse. I'm asking if you invited her to



1 G Maxwell - Confidential

2 come to Jeffrey Epstein's home?

3 A. Again, there would be no course to  
4 have a conversation with Virginia unless she  
5 held herself out to be a masseuse.

6 Q. I'm not asking that question. I'm  
7 asking if you invited her to come to Jeffrey  
8 Epstein's home when she was under the age of  
9 18?

10 A. Again, I repeat, she was a masseuse  
11 and in the form and as my job, I was to have  
12 people who he wanted for various things  
13 including massage. She came as a masseuse.

14 Q. So you invited her to his home to  
15 come to give a massage, is that correct?

16 MR. PAGLIUCA: Object to the form  
17 and foundation. Misstates the witness'  
18 testimony.

19 A. Again, I did not invite Virginia  
20 Roberts. She came as a masseuse.

21 Q. She who invited her to come as a  
22 masseuse, she just showed up at the front  
23 door?

24 MR. PAGLIUCA: Object to the form  
25 and foundation.

1 G Maxwell - Confidential

2 A. Ms. Roberts held herself out --

3 Q. I'm not asking how she held herself  
4 out. I'm asking how she arrived at the home.

5 Did you meet her and invite her to come to  
6 the home or how did she arrive there?

7 MR. PAGLIUCA: Object to the form  
8 and foundation.

9 A. Ms. Roberts held her to be a  
10 masseuse and her mother drove her to the  
11 house.

12 Q. When did you first meet Virginia  
13 Roberts?

14 A. I don't have a recollection of the  
15 first meeting.

16 Q. Do you recall meeting her at  
17 Mar-a-Lago?

18 A. Like I said, I don't have a  
19 recollection of meeting Ms. Roberts.

20 Q. So you recall Ms. Roberts being  
21 brought to the home by her mother, is that  
22 your testimony?

23 A. That is my testimony.

24 Q. And that is the first time you met  
25 her?

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2 A. Like I said, I don't recall meeting  
3 her the first time. I do remember her mother  
4 bringing her to the house.

5 Q. Are you a member at Mar-a-Lago?

6 A. No.

7 Q. Have you visited Mar-a-Lago?

8 A. Yes.

9 Q. Did you visit Mar-a-Lago in the  
10 year 2000?

11 A. I'm pretty sure I did.

12 Q. When Ms. Roberts arrived at the  
13 home with her mother, what happened?

14 A. I spoke to her mother outside of  
15 the house and she -- what I don't recall is  
16 exactly what happened because I was talking  
17 to her mother the entire she was in the  
18 house.

19 Q. Did you introduce Ms. Roberts to  
20 Jeffrey Epstein?

21 A. I don't recall how she actually met  
22 Mr. Epstein. As I said, I spoke to her  
23 mother the entire time outside the house.

24 Q. Did you walk Ms. Roberts up to the  
25 upstairs location at the Palm Beach house to

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2 meet Mr. Epstein?

3 MR. PAGLIUCA: Object to the form  
4 and foundation.

5 Q. You can answer.

6 A. I just explained.

7 A. I spent the entire time talking to  
8 Virginia's mother outside the house so the  
9 answer to the question is no.

10 Q. No, did you not walk her up and  
11 introduce her to Mr. Epstein?

12 A. I just said no.

13 Q. Did you participate in a massage  
14 this first time when she first came to the  
15 home and you were speaking with her mother,  
16 she was in the home, is that correct, you  
17 brought her into the home?

18 MR. PAGLIUCA: Object to the form  
19 and foundation.

20 A. I will repeat again, I was standing  
21 outside with her mother so very difficult for  
22 me to do anything else at that time so no, I  
23 did not take her upstairs.

24 Q. Did you participate --

25 A. Virginia lied 100 percent about

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2       absolutely everything that took place in that  
3       first meeting. She has lied repeatedly,  
4       often and is just an awful fantasist. So  
5       very difficult for anything to take place  
6       that she repeated because I was with her  
7       mother the entire time.

8           Q.     So did you have -- did you give a  
9       massage with Virginia Roberts and Mr. Epstein  
10      during the first time Virginia Roberts was at  
11      the West Palm Beach house?

12           MR. PAGLIUCA: Object to the form  
13      and foundation.

14           Q.     Yes or no?

15           A.     No.

16           Q.     Have you ever given a massage with  
17      Virginia Roberts in the room and Jeffrey  
18      Epstein?

19           MR. PAGLIUCA: Object to the form  
20      and foundation.

21           A.     No.

22           Q.     Have you ever given Jeffrey Epstein  
23      a massage?

24           MR. PAGLIUCA: Object to the form,  
25      foundation. And I'm going to instruct

1           G Maxwell - Confidential  
2           you not to answer that question. I  
3           don't have any problem with you asking  
4           questions about what the subject matter  
5           of this lawsuit is, which would be, as  
6           you've termed it, sexual trafficking of  
7           Ms. Roberts.

8           To the extent you are asking for  
9           information relating to any consensual  
10          adult interaction between my client and  
11          Mr. Epstein, I'm going to instruct her  
12          not to answer because it's not part of  
13          this litigation and it is her private  
14          confidential information, not subject to  
15          this deposition.

16          MS. McCAWLEY: You can instruct her  
17          not to answer. That is your right. But  
18          I will bring her back for another  
19          deposition because it is part of the  
20          subject matter of this litigation so she  
21          should be answering these questions.  
22          This is civil litigation, deposition and  
23          she should be responsible for answering  
24          these questions.

25          MR. PAGLIUCA: I disagree and you

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2 understand the bounds that I put on it.

3 MS. McCAWLEY: No, I don't. I will  
4 continue to ask my questions and you can  
5 continue to make your objections.

6 Q. Did you ever participate from the  
7 time period of 1992 to 2009, did you ever  
8 participate in a massage with Jeffrey Epstein  
9 and another female?

10 MR. PAGLIUCA: Objection. Do not  
11 answer that question. Again, to the  
12 extent you are asking for some sort of  
13 illegal activity as you've construed in  
14 connection with this case I don't have  
15 any problem with you asking that  
16 question. To the extent these questions  
17 involve consensual acts between adults,  
18 frankly, they're none of your business  
19 and I will instruct the witness not to  
20 answer.

21 MS. McCAWLEY: This case involves  
22 sexual trafficking, sexual abuse,  
23 questions about her having interactions  
24 with other females is relevant to this  
25 case. She needs to answer these

1 G Maxwell - Confidential

2 questions.

3 MR. PAGLIUCA: I'm instructing her  
4 not to answer.

5 MS. McCAWLEY: Then we will be back  
6 here again.

7 Q. Have you ever given a massage to  
8 Mr. Epstein with a female that was under the  
9 age of 18?

10 A. Can you repeat the question?

11 Q. Yes. Have you ever given a massage  
12 to Mr. Epstein with a female that was under  
13 the age of 18?

14 A. No.

15 Q. Have you ever observed Mr. Epstein  
16 having a massage given by an individual, a  
17 female, who was under the age of 18?

18 A. No.

19 Q. Have you ever observed females  
20 under the age of 18 in the presence of  
21 Jeffrey Epstein at his home?

22 MR. PAGLIUCA: Object to the form  
23 and foundation.

24 A. Again, I have friends that have  
25 children --



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2 Q. I'm not talking about friends. I'm  
3 talking about individuals --

4 MR. PAGLIUCA: I'm going to object  
5 to you interrupting the witness who was  
6 answering your question. The question  
7 was, have you ever seen anyone, female  
8 under the age of 18 at the house and  
9 that's the question she was answering.  
10 If you want to strike that question and  
11 ask another question, feel free, but let  
12 the witness respond, please.

13 MS. McCAWLEY: I will do that.

14 Q. Have you ever observed a female  
15 under the age of 18 at Jeffrey Epstein's home  
16 that was not a friend, a child -- one of your  
17 friend's children?

18 A. Again, I can't testify to that  
19 because I have no idea what you are talking  
20 about.

21 Q. You have no idea what I'm talking  
22 about in the sense you never observed a  
23 female under the age of 18 at Jeffrey  
24 Epstein's home that was not one of your  
25 friend's children, is that correct?

1 G Maxwell - Confidential

2 MR. PAGLIUCA: Object to the form  
3 and foundation.

4 A. How would I possibly know how  
5 someone is when they are at his house. You  
6 are asking me to do that. I cannot possibly  
7 testify to that. As far as I'm concerned,  
8 everyone who came to his house was an adult  
9 professional person.

10 Q. Are you familiar with the police  
11 report that was issued in respect to the  
12 investigation in this matter?

13 MR. PAGLIUCA: Object to the form  
14 and foundation.

15 Q. Are you familiar with the police  
16 report that was used in this matter, the  
17 investigation of Jeffrey Epstein, has been  
18 produced as a document in this matter?

19 A. I have seen a police report.

20 (Maxwell Exhibit 1, police report,  
21 marked for identification.)

22 Q. The police report that you have in  
23 front of you, can you turn to page 28 of that  
24 report, the numbers are on the top right-hand  
25 corner.

1 G Maxwell - Confidential

2 You will see some redactions in  
3 this report, Ms. Maxwell, the redacted  
4 information is redacted because it reveals  
5 the name of a minor, someone who is under the  
6 age of 18.

7 On page 28, in the third paragraph,  
8 about halfway down, it says, Roberts stated  
9 she performed the massage naked. At the  
10 conclusion of this massage, Epstein paid  
11 RobSON \$200 for the massage. He explained, I  
12 know you are not comfortable put I will pay  
13 you if you bring some girls. He told her the  
14 younger the better. Robson stated once tried  
15 to bring a 23 year old to Epstein and he  
16 stated the female was too old.

17 Have you heard Mr. Epstein use the  
18 phrase the younger the better?

19 A. I have no recollection of hearing  
20 that.

21 Q. Have you used the phrase in talking  
22 to Ms. Roberts and asking her to recruit  
23 females for Mr. Epstein, the younger the  
24 better?

25 MR. PAGLIUCA: Object to the form

1 G Maxwell - Confidential

2 and foundation of the question.

3 A. First of all, can you break the  
4 question apart.

5 Q. Have you used the phrase the  
6 younger the better in speaking to Ms. Roberts  
7 and asking her to recruit females for Jeffrey  
8 Epstein?

9 MR. PAGLIUCA: Object to the form  
10 and foundation.

11 Q. You can answer. It's yes or no.

12 A. No, that's absolutely not true, on  
13 the second part of your question, I have not  
14 asked Virginia to recruit females and the  
15 first part of your question, if you can  
16 repeat that again, the question you asked.

17 Q. Will you read back the question.

18 (Record read.)

19 A. I believe I answered the later part  
20 of the question. The first part of the  
21 question, it's impossible for me to recall  
22 events that took place 16 years ago but it  
23 doesn't sound like something I would say.

24 Q. On page 28, that same paragraph,  
25 Roberts was asked how many girls in total she

1 G Maxwell - Confidential

2 brought to Epstein. Robson stated that she  
3 can remember, Robson stated that she brought  
4 and, it's redacted there, and the victim in  
5 this case.

6 Let me ask my question, I have a  
7 question pending right now.

8 Are you testifying that you are  
9 unaware of any underage, under the age of 18,  
10 females coming to Jeffrey Epstein's home to  
11 perform massages?

12 MR. PAGLIUCA: Object to the form  
13 foundation.

14 A. You need to straddle that question  
15 in a different time period. When I was  
16 there, at the time I was present, the people  
17 that gave Jeffrey, men and women who gave  
18 Jeffrey massages were adults over the age of  
19 18.

20 Q. Never in your time at any of  
21 Jeffrey Epstein's homes were you present when  
22 a female under the age of 18 was there to  
23 give Jeffrey Epstein a massage?

24 MR. PAGLIUCA: Object to the form  
25 and foundation.

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2 A. First of all, as I said when I was  
3 present --

4 Q. It is a yes or no.

5 A. No, it is not.

6 Q. You can answer the question in full  
7 but please provide yes or no as an initial  
8 matter.

9 A. I cannot answer yes or no, it's not  
10 bounded by time. It's entirely possible I  
11 could have been in a room or even in the  
12 vicinity of Palm beach when somebody came and  
13 I would not know. How would I know when  
14 somebody was in the house. There is no way I  
15 can know.

16 Q. Did you stay at Jeffrey Epstein's  
17 home when you were in Palm Beach?

18 A. Most of the time.

19 Q. So how is it that you wouldn't know  
20 if there was a female in the home under the  
21 age of 18 if you were staying there?

22 A. Well, first of all, when I was  
23 staying there, the house is actually quite  
24 large and I have a very busy job and I had an  
25 office with a door so the door would be shut

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2 and I would be working. I'm not responsible  
3 for what Jeffrey does and I don't always pay  
4 attention to what happens in the house. I'm  
5 very busy.

6 Q. So you're testifying that you never  
7 observed a female under the age of 18 at  
8 Jeffrey Epstein's West Palm Beach home?

9 MR. PAGLIUCA: Object to the form  
10 and foundation.

11 A. I already answered that question, I  
12 believe.

13 Q. You didn't answer my question.

14 A. I did.

15 Q. Did you observe a female under the  
16 age of 18 at Jeffrey Epstein's home in Palm  
17 Beach?

18 A. Like I said, I work, I don't sit  
19 there and watch people coming in and out of  
20 the house. I cannot possibly tell you if I'm  
21 in the home that somebody was there that I  
22 did not see, I cannot comment on it, I have  
23 no idea.

24 Q. Did you observe females at Jeffrey  
25 Epstein's home that were laying out topless

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2 in the back of the home, in other words  
3 without a shirt on?

4 A. So that's just another of  
5 Virginia's lies. So let's be clear, at the  
6 time when I was there and present, frequently  
7 at the house, it was unusual to see people  
8 without their clothes on.

9 Q. When you say unusual, did you  
10 observe people without their clothes at  
11 Jeffrey Epstein's home?

12 A. Can I answer. Sometimes people in  
13 the privacy of a house and swimming pool, I  
14 have seen people from time to time take their  
15 top off. I have seen people from time to  
16 time do that. Very unusual. Naked people  
17 around the people at any frequent period of  
18 time, I have never seen.

19 Q. Were they under the age of 18?

20 A. As I was saying, people when I was  
21 in the house, were of adult age, if they were  
22 children, friends of my family or friends  
23 that were there, they may well have been  
24 because I have nieces and nephews under the  
25 age of 18, I cannot testify to anybody else



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2 -- just another one of Virginia's many  
3 fictitious lies and stories to make this a  
4 salacious event to get interest and press.  
5 It's absolute rubbish.

6 Q. Were you in charge of hiring  
7 individuals to provide massages for Jeffrey  
8 Epstein?

9 A. My job included hiring many people.  
10 There were six homes. As I sit here, I hired  
11 assistants, I hired architects, I hired  
12 decorators, I hired cooks, I hired cleaners,  
13 I hired gardeners, I hired pool people, I  
14 hired pilots, I hired all sorts of people.

15 In the course and a very small part  
16 of my job was from from time to time to find  
17 adult professional massage therapists for  
18 Jeffrey.

19 Q. When you say adult professional  
20 massage therapists, where did you find these  
21 massage therapists?

22 A. From time to time I would visit  
23 professional spas, I would receive a massage  
24 and if the massage was good I would ask that  
25 man or woman if they did home visits.

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2 Q. Did you ever hire a masseuse that  
3 was under the age of 18?

4 MR. PAGLIUCA: Object to the form  
5 and foundation.

6 Q. Did you?

7 A. Again, I don't hire massage  
8 therapists, so that was not my job.

9 Q. You just said you did, you just  
10 said you hired massage therapists for Jeffrey  
11 Epstein, I'm asking if you hired a massage  
12 therapist who was under the age of 18?

13 A. Let me correct myself. When I  
14 meant hire, I didn't mean hire in the way you  
15 are doing it. What I say is that I went to  
16 spas and I met people and if they did home  
17 visits, Jeffrey would then, in fact, hire  
18 them. I'm not responsible for hiring  
19 someone. And they were not full-time, so  
20 it's not a correct characterization.

21 Q. Did you ever, your term is meet,  
22 did you ever meet a person that was under the  
23 age of 18 that you -- that Jeffrey then hired  
24 as a masseuse?

25 MR. PAGLIUCA: Object to the form

1 G Maxwell - Confidential

2 and foundation.

3 A. First of all, Virginia Roberts who  
4 you are referring to was a masseuse aged 17,  
5 we all now know, so your story that you keep  
6 pushing out to the press that she was a 15  
7 year old -- you and I both know was a lie,  
8 correct.

9 Q. You are not sentencing my question.

10 A. You and I both know that was a lie,  
11 correct.

12 Q. You are not answering my question.  
13 I'm asking you whether you ever met a female  
14 under the age of 18 that Jeffrey then hired  
15 as a masseuse?

16 MR. PAGLIUCA: Object to the form  
17 and foundation.

18 A. The only person I can talk about  
19 who clearly was a massage age 17, a masseuse,  
20 was Virginia.

21 Q. Did you meet her and then introduce  
22 her to Jeffrey?

23 A. I don't know. I already testified  
24 I don't recall meeting her.

25 (Maxwell Exhibit 2, email, marked

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2 for identification.)

3 Q. So I'm showing you a document that  
4 we have marked as Maxwell Exhibit 2. It's a  
5 document you produced in this matter labeled  
6 confidential GM 00109. It's dated Sunday  
7 June 12, 2011. It's from Jeffrey Epstein to  
8 you. If you can turn to page 4 -- sorry, can  
9 you turn to the first page, the cover page  
10 initially which is 00109. If you look under  
11 the time stamp it says, June 12, 2011 at 4:12  
12 p.m., it says [REDACTED]

13 Is that your email address?

14 A. It is.

15 Q. Under that it says, Thank you. I  
16 have it now and I'm working on a letter, a  
17 little, I will send the final version  
18 tomorrow and what ever it is will be  
19 factually accurate.

20 Do you see that on page 1?

21 A. I do.

22 Q. Then I would like you to turn to  
23 page 4 please. The second paragraph down on  
24 page 4, it states, After some thought, I  
25 recall that I first met Ms. Roberts when she

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2 was working at a premier resort claiming to  
3 be 18 years old and a professional masseuse?

4 MR. PAGLIUCA: What line are you  
5 on, counsel.

6 MS. McCAWLEY: Second paragraph  
7 down.

8 MR. PAGLIUCA: I got it.

9 Q. Is that a statement that you wrote?

10 A. It appears to be.

11 Q. So does that correct your testimony  
12 that you did meet Ms. Roberts at Mar-a-Lago?

13 A. Again, this was written in, when  
14 were you saying?

15 Q. 2011.

16 A. So by 2011, Ms. Roberts had already  
17 perpetrated so many lies and stories it's  
18 hard for me to accurately tell you today what  
19 I remember back then. As I sit here today,  
20 the testimony I give you today, I do not  
21 recollect it.

22 Q. Do you have a reason to say that  
23 this document that you wrote is incorrect?

24 A. It's in 2011, I can't possibly tell  
25 you what I remember in 2011.

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2 Q. Are you questioning that this  
3 document is incorrect, this document -- this  
4 email that you wrote?

5 A. I wrote an email. I was trying to  
6 be accurate, so who knows, with all the  
7 rubbish that you guys have put out in the  
8 press that I read, maybe in the moment I  
9 wrote it a memory came to me that I don't  
10 know, but as I sit here today and the  
11 testimony I gave you today is I don't  
12 recollect it.

13 Q. Does this refresh your recollection  
14 that you recalled meeting Ms. Roberts at  
15 Mar-a-Lago?

16 A. It does not.

17 Q. So your testimony today is that you  
18 don't remember meeting Ms. Roberts at  
19 Mar-a-Lago?

20 A. I do not.

21 I just want to clarify, when you  
22 read so much stuff and so much rubbish that  
23 comes out from Virginia Roberts, you don't  
24 know what's up and down, at the time I wrote  
25 this I believe I had a memory but as I sit

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2 here today I do not.

3 Q. Ms. Maxwell, when did you first  
4 meet [REDACTED]?

5 MR. PAGLIUCA: Object to the form  
6 and foundation.

7 A. I have no idea when I met her.

8 Q. Do you know how old she was when  
9 you met her?

10 A. I have no idea how old she was when  
11 I met her.

12 Q. Is it possible she was 13 years old  
13 when you first met her?

14 MR. PAGLIUCA: Object to the form  
15 and foundation.

16 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21 Q. I understand [REDACTED]

22 [REDACTED]

23 I'm asking if [REDACTED] was 13  
24 years old when you first met her?

25 A. I have no idea.

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2 Q. Was she under 18 when you first met  
3 her?

4 A. I have no idea how old she was when  
5 I first met her.

6 Q. Did she look like a child when you  
7 first met her?

8 A. I don't remember what she looked  
9 like at the time she was in the house.

10 Q. How many years have you known her?

11 A. I can only recall the last time I  
12 saw her.

13 Q. When was the first time you met  
14 her?

15 A. Again, I just told you, I don't  
16 recall the first time I met her.

17 Q. Did [REDACTED] travel with you  
18 on Jeffrey's planes?

19 A. I wouldn't remember if [REDACTED] was on  
20 the plane or not.

21 Q. Did you ever have sex with [REDACTED]  
22 [REDACTED]

23 A. No.

24 Q. Did you ever observe Jeffrey having  
25 sex with [REDACTED]?



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2 A. No.

3 Q. Were you aware that Jeffrey was  
4 having sexual contact with [REDACTED] when  
5 she was 13 years old?

6 MR. PAGLIUCA: Object to the form  
7 and foundation.

8 A. I would be very shocked and  
9 surprised if that were true.

10 Q. Were you in the house when [REDACTED]  
11 [REDACTED] was in the house in a private area  
12 with Jeffrey Epstein?

13 MR. PAGLIUCA: Object to the form  
14 and foundation.

15 A. Can you repeat the question.

16 Q. Were you ever in the Palm Beach  
17 house when Jeffrey Epstein was in the house  
18 with [REDACTED]?

19 MR. PAGLIUCA: Object to the form  
20 and foundation.

21 A. I've already testified that I have  
22 met her and that she was there [REDACTED]

23 [REDACTED] I don't understand what your  
24 question is asking.

25 Q. So you have never seen [REDACTED]

1 G Maxwell - Confidential

2 [REDACTED]

3 MR. PAGLIUCA: Object to the form  
4 and foundation.

5 Q. Is that your testimony?

6 A. I already said I don't recall all  
7 the times I've seen her and I have no memory  
8 of that.

9 Q. Have you ever seen [REDACTED] in  
10 the house with Jeffrey Epstein [REDACTED]  
11 [REDACTED]

12 MR. PAGLIUCA: Object to the form  
13 and foundation.

14 A. I just told you I don't recall  
15 seeing [REDACTED]

16 Q. Were you ever involved in an orgy  
17 with [REDACTED]?

18 A. No, absolutely not.

19 Q. Can you tell me, do you know an  
20 individual by the name of Nadia Marcinkova?

21 A. I do.

22 Q. How did you meet Nadia Marcinkova?

23 A. At some point she was a friend of  
24 Jeffrey's and I recall meeting her at some  
25 point.

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2 Q. Did you hire her?

3 A. First of all, I don't hire girls  
4 like that, so let's be clear, I already  
5 testified to that, and I have no idea what  
6 you are referring to.

7 Q. When you say girls like that, what  
8 do you mean?

9 A. I hire people who are professional  
10 at the house. You are asking if I hired  
11 somebody to do what, I don't know what you  
12 are talking about. I hired people to work in  
13 the homes.

14 Q. What was Nadia Marcinkova doing?

15 MR. PAGLIUCA: Object to the form  
16 and foundation.

17 A. I have no idea what Nadia  
18 Marcinkova was doing. I didn't hire her and  
19 I don't know what you are referring to.

20 Q. You met Nadia Marcinkova?

21 A. I testified I did.

22 Q. Did she work for Jeffrey Epstein?

23 A. I have no idea what she did.

24 Q. Have you flown on planes with Nadia  
25 Marcinkova?

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2 A. I don't recollect. I don't know if  
3 I did.

4 Q. How many times have you flown on  
5 Jeffrey Epstein's planes?

6 A. Too many times.

7 Q. More than 300?

8 A. I really couldn't tell you how  
9 many.

10 Q. More than 400?

11 A. Again, I said I cannot tell you how  
12 many, a lot.

13 Q. How many times with Nadia  
14 Marcinkova?

15 A. I already testified, I have no  
16 idea.

17 Q. How old was Nadia Marcinkova when  
18 she first became involved with Jeffrey?

19 A. I have no idea.

20 Q. Was she 14?

21 MR. PAGLIUCA: Object to the form  
22 and foundation.

23 A. I have no idea.

24 Q. Did she look like a child the first  
25 time you met her?

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2 MR. PAGLIUCA: Object to the form  
3 and foundation. Asked and answered.

4 Q. Did she look like a child the first  
5 time you met Nadia Marcinkova?

6 A. I don't know what you mean if she  
7 looked like a child.

8 Q. Did she look like she was under the  
9 age of 18?

10 A. No.

11 Q. Did she look like she was under the  
12 age of 16?

13 A. I just testified -- first of all, I  
14 couldn't tell you how old she was, she didn't  
15 like like a child, leave it at that.

16 Q. Did you know that she was a child?

17 MR. PAGLIUCA: Object to the form  
18 and foundation.

19 A. I just answered I did not know how  
20 old she was and she looked like an adult.

21 Q. In the times that you traveled with  
22 her on Jeffrey Epstein's planes, did you ever  
23 ask her how old she was?

24 MR. PAGLIUCA: Object to the form  
25 and foundation. Assumes facts not in

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2 evidence. The witness already testified  
3 she doesn't remember.

4 Q. You can answer that question.

5 Did you ever ask her on the many  
6 flights you were with her or the many times  
7 you were with her at the house?

8 A. First of all, I don't know I was on  
9 many flights with her, you are making stories  
10 up again as usual. And secondly, if I was on  
11 a flight with her, there would not be any  
12 reason why I would ask her how old she was.

13 Q. You don't recollect having any  
14 conversation with her about her age?

15 A. I already testified to that.

16 Q. Do you know what Nadia Marcinkova  
17 was hired to do for Jeffrey?

18 A. I already testified I didn't know  
19 she was hired and I don't know that she did  
20 anything. I don't know how to answer that  
21 question.

22 Q. Was Nadia Marcinkova at the house,  
23 the Palm Beach house, when you were present  
24 at that house?

25 MR. PAGLIUCA: Object to the

1 G Maxwell - Confidential

2 foundation.

3 A. I have no recollection of her being  
4 at the house at the same time as me.

5 Q. When did you first meet Nadia  
6 Marcinkova?

7 A. I already told you I don't recall.

8 Q. Do you recall anything about Nadia  
9 Marcinkova?

10 A. That she was tall and blond.

11 Q. Do you recall Nadia Marcinkova  
12 interacting with other females at the house?

13 A. No, I do not.

14 Q. Did you arrange to get a visa for  
15 Nadia Marcinkova to come into this country?

16 MR. PAGLIUCA: Object to the form  
17 and foundation.

18 A. Absolutely not.

19 Q. Did Jeffrey arrange for a visa for  
20 Nadia Marcinkova?

21 MR. PAGLIUCA: You need to give me  
22 a break so I can interpose an objection.

23 Object to the form and foundation.

24 Q. You can answer.

25 A. What was the question?

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2 Q. Did Jeffrey arrange for a visa for  
3 Nadia Marcinkova?

4 A. I don't know what Jeffrey did. I  
5 cannot testify what Jeffrey did.

6 Q. Was Nadia involved in sex with  
7 Jeffrey and other girls?

8 MR. PAGLIUCA: Object to the form  
9 and foundation.

10 Q. Girls under the age of 18?

11 MR. PAGLIUCA: Same objection.

12 A. I have no idea.

13 Q. Was Nadia involved with sex with  
14 Jeffrey and girls over the age of 18?

15 MR. PAGLIUCA: Same objection.

16 A. I have no idea.

17 Q. Did Nadia recruit other girls for  
18 sex with Jeffrey?

19 MR. PAGLIUCA: Object to the form  
20 and foundation.

21 A. I have no idea.

22 Q. Do you still talk to Nadia?

23 A. No.

24 Q. Is she a pilot?

25 A. I have no idea.



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2 Q. Does she fly with Larry Veseski  
3 (phonetic), one of Jeffrey's pilots?

4 A. I have no idea.

5 Q. Are you a pilot?

6 A. I am.

7 Q. Have you flown with Jeffrey Veseki?

8 A. I have.

9 Q. Have you flown with Nadia  
10 Marcinkova?

11 A. What do you mean by flown?

12 Q. Have you been on planes with her?

13 A. I already testified I don't recall  
14 having her on a plane with me.

15 Q. Do you know Sarah Kellen?

16 A. I do.

17 Q. When did you first meet her?

18 A. I don't recall exact dates.

19 Q. Did you meet her with the purpose  
20 of hiring her to work for Jeffrey or having  
21 Jeffrey hire her?

22 MR. PAGLIUCA: Object to the form  
23 and foundation.

24 A. No.

25 Q. What was her relationship with

1 G Maxwell - Confidential

2 Jeffrey?

3 MR. PAGLIUCA: Object to the form  
4 and foundation.

5 A. I don't know exactly the nature of  
6 her relationship but she worked for him.

7 Q. What did she do?

8 MR. PAGLIUCA: Object to the form  
9 and foundation.

10 A. At the time she when was with him I  
11 believe she traveled with him and helped with  
12 his travel arrangements.

13 Q. Did she bring girls to the house to  
14 give massages to Jeffrey?

15 MR. PAGLIUCA: Object to the form  
16 and foundation.

17 A. I don't know what Sarah did.

18 Q. So you never observed Sarah  
19 bringing girls to the home to give massages  
20 to Jeffrey?

21 MR. PAGLIUCA: Object to the form  
22 and foundation.

23 A. I don't understand the question,  
24 what did you mean bring?

25 Q. Did you ever observe Sarah

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2 inviting, bringing, walking anyone into the  
3 home to give a massage for Jeffrey?

4 MR. PAGLIUCA: Object to the form  
5 and foundation.

6 A. I don't recollect anything like  
7 that.

8 Q. Are you aware that Sarah Kellen was  
9 a co-conspirator, named as a co-conspirator  
10 in the case involving Jeffrey Epstein?

11 MR. PAGLIUCA: Object to the form  
12 and foundation and also calls for a  
13 legal conclusion.

14 MS. McCAWLEY I'm just asking if she  
15 is aware of that.

16 A. I am aware.

17 Q. Who paid Sarah Kellen?

18 A. I have no idea.

19 Q. Did you ever arrange payment for  
20 any of the employees at the home?

21 MR. PAGLIUCA: Object to the form.

22 A. What do you mean by arrange?

23 Q. Were you ever in charge or  
24 responsible for paying individuals at the  
25 home, that worked there?

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2 A. People had salaries and they were  
3 paid by the office.

4 Q. Did you ever pay any individual,  
5 did you ever hand an individual cash for work  
6 they performed?

7 MR. PAGLIUCA: Object to the form.

8 A. Can you be more specific about what  
9 you are asking me.

10 Q. Did you ever hand any individual  
11 who was working at the home cash as payment  
12 for something that they performed at the  
13 home?

14 MR. PAGLIUCA: Object to the form.

15 A. To the best of my recollection  
16 there were very few times where I would leave  
17 some cash for people for work performed.

18 Q. And what type of work was being  
19 performed where you would be doing that?

20 A. If I left cash for the pool guy, I  
21 would have left potentially some cash for the  
22 gardener, potentially for exercise  
23 instructors and sometimes for massage  
24 therapy.

25 Q. How much were the massage

1 G Maxwell - Confidential

2 therapists paid?

3 MR. PAGLIUCA: Object to the form  
4 and foundation.

5 A. They get paid between 100 and \$200.

6 Q. Did it vary based on what sexual  
7 acts they performed?

8 MR. PAGLIUCA: Object to the form  
9 and foundation.

10 A. No. It varied depending how much  
11 time, some massage therapists charge more and  
12 some charge less.

13 Q. Did the massage therapists that  
14 were hired to come to the home perform sexual  
15 acts for Jeffrey Epstein?

16 MR. PAGLIUCA: Object to the form  
17 and foundation.

18 A. What are you asking me?

19 Q. I'm asking if the massage  
20 therapists --

21 A. Are you asking me about underage  
22 girls?

23 Q. I'm asking in general, did any of  
24 the massage therapists in the home --

25 A. Are you asking if they were paid

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2 for sexual acts.

3 Q. I'm asking if they performed sexual  
4 acts?

5 MR. PAGLIUCA: Object to the form  
6 and foundation.

7 Q. Did any of the massage therapists  
8 who were at the home perform sexual acts for  
9 Jeffrey Epstein?

10 A. I don't know what you mean by  
11 sexual acts.

12 Q. Did any of the massage therapists  
13 who were working at the home perform sexual  
14 acts, including touching the breasts,  
15 touching the vaginal area, being touched  
16 while Jeffrey is masturbating, having  
17 intercourse, any of those things?

18 MR. PAGLIUCA: Objection. Form and  
19 foundation.

20 To the extent any of this is asking  
21 for to your knowledge any consensual sex  
22 act that may or may not have involved  
23 you, I'm instructing you not to answer  
24 the question.

25 Q. I'm not asking about consensual sex

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2 acts. I'm asking whether any of the massage  
3 therapists performed sexual acts for Mr.  
4 Epstein, as I have just described?

5 A. I have never seen anybody have  
6 sexual intercourse with with Jeffrey, ever.

7 Q. I'm not asking about sexual  
8 intercourse. I'm asking about any sexual  
9 act, touching of the breast -- did you ever  
10 see -- can you read back the question?

11 (Record read.)

12 A. I'm not addressing any questions  
13 about consensual adult sex. If you want to  
14 talk about what the subject matter, which is  
15 defamation and lying, Virginia Roberts, that  
16 you and Virginia Roberts are participating in  
17 perpetrating her lies, I'm happy to address  
18 those. I never saw any inappropriate  
19 underage activities with Jeffrey ever.

20 Q. I'm not asking about underage. I'm  
21 asking about whether any of the masseuses  
22 that were at the home perform sexual acts for  
23 Jeffrey Epstein?

24 A. I have just answered the question.

25 Q. No, you haven't.

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2 A. I have.

3 Q. No, you haven't.

4 A. Yes, I have.

5 Q. You are refusing to answer the  
6 question.

7 A. Let's move on.

8 Q. I'm in charge of the deposition. I  
9 say when we move on and when we don't.

10 You are here to respond to my  
11 questions. If you are refusing to answer the  
12 court will bring you back for another  
13 deposition to answer these questions.

14 Do you understand that?

15 MR. PAGLIUCA: You don't need to  
16 threaten the witness.

17 MS. McCAWLEY: I'm not threatening  
18 her. I'm making sure the record is  
19 clear.

20 MR. PAGLIUCA: Certainly can you  
21 apply to have someone come back and the  
22 court may or may not have her come back  
23 again.

24 Again, she is not answering  
25 questions that relate to adult consent



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2 sex acts. Period. And that's the  
3 instruction and we can take it up with  
4 the court.

5 Q. Ms. Maxwell, are you aware of any  
6 sexual acts with masseuses and Jeffrey  
7 Epstein that were nonconsensual?

8 A. No.

9 Q. How do you know that?

10 A. All the time that I have been in  
11 the house I have never seen, heard, nor  
12 witnessed, nor have reported to me that any  
13 activities took place, that people were in  
14 distress, either reported to me by the staff  
15 or anyone else. I base my answer based on  
16 that.

17 Q. Are you familiar with a person by  
18 the name of Annie Farmer?

19 A. I am.

20 Q. Has Annie Farmer given a statement  
21 to police about you performing sexual acts on  
22 her?

23 A. I have not heard that.

24 Q. Has Annie Farmer given a statement  
25 to police about Jeffrey Epstein performing

1 G Maxwell - Confidential

2 sexual acts on her?

3 MR. PAGLIUCA: Object to the form  
4 and foundation.

5 A. I have not heard that.

6 Q. How do you know Annie Farmer?

7 A. Annie Farmer had a sister and her  
8 sister introduced Annie Farmer, I believe, to  
9 Jeffrey.

10 Q. Was Annie Farmer under the age of  
11 18?

12 MR. PAGLIUCA: Object to the form  
13 and foundation.

14 A. I don't recall how old Annie Farmer  
15 was.

16 Q. Did she tell police that Jeffrey  
17 Epstein assaulted her sexually?

18 MR. PAGLIUCA: Object to the form  
19 and foundation.

20 A. I never heard that.

21 Q. Did Sarah Kellen recruit or bring  
22 girls to the home that were under the age of  
23 18?

24 MR. PAGLIUCA: Object to the form  
25 and foundation and I think this has been

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2 asked and answered already.

3 Q. You can answer the question.

4 A. I have no idea what Sarah Kellen  
5 did.

6 Q. You never observed Sarah Kellen  
7 with girls under the age of 18 at Jeffrey's  
8 home?

9 MR. PAGLIUCA: Object to the form  
10 and foundation.

11 A. The answer is no, I have no idea.

12 Q. Do you know Glenn Dubin?

13 A. I do.

14 Q. What is your relationship with  
15 Glenn Dubin?

16 MR. PAGLIUCA: Object to the form.

17 A. What do you mean what is my  
18 relationship.

19 Q. Are you friendly with him, how do  
20 you know him?

21 A. He is the husband of Eva Dubin.

22 Q. Is Eva Dubin one of your friends?

23 A. Yes.

24 Q. Did you ever send Virginia to  
25 Glenn's condo at the Breakers to give him a

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2 message?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. No.

6 Q. Did you ever instruct Virginia  
7 Roberts to have sex with Glenn?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. I have never instructed Virginia to  
11 have sex with anybody ever.

12 Q. How old was Eva Anderson when she  
13 met Jeffrey?

14 MR. PAGLIUCA: Objection to the  
15 form and foundation.

16 A. I have no idea.

17 Q. What's she under the age of 18?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. I just testified I have idea how  
21 old she was.

22 Q. You testified she was your friend.  
23 You don't know how old she was when she met  
24 Jeffrey?

25 A. That happened sometime in the '70s,

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2 how would I know, or '80s. I have no idea.

3 Can you testify to what your friends did 30

4 years ago?

5 Q. You don't ask the questions here,

6 Ms. Maxwell.

7 What about Johanna Sjoberg, when

8 did you first meet Johanna?

9 A. I don't recall the exact date.

10 Q. Did you hire Johanna?

11 A. I don't hire people, she came to

12 work at the house to answer phones.

13 Q. Where did you meet her?

14 A. I just testified, I don't recall

15 exactly when I met her.

16 Q. Was one of your job

17 responsibilities to interview people that

18 would be then hired by Jeffrey?

19 A. That was one of my

20 responsibilities.

21 Q. Do you recall interviewing Johanna?

22 A. I don't recall the exact interview,

23 no.

24 Q. Do you know what tasks Johanna was

25 hired to performance?

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2 A. She was tasked to answer  
3 telephones.

4 Q. Did you ever ask her to rub  
5 Jeffrey's feet?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. I believe that I have read that,  
9 but I don't have any memory of it.

10 Q. Did you ever tell Johanna that she  
11 would get extra money if she provided Jeffrey  
12 massages?

13 A. I was always happy to give career  
14 advice to people and I think that becoming  
15 somebody in the healthcare profession, either  
16 exercise instructor or nutritionist or  
17 professional massage therapist is an  
18 excellent job opportunity. Hourly wages are  
19 around 7, 8, \$9 and as a professional  
20 healthcare provider you can earn somewhere  
21 between as we have established 100 to \$200  
22 and to be able to travel and have a job that  
23 pays that is a wonderful job opportunity. So  
24 in the context of advising people for  
25 opportunities for work, it is possible that I

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2 would have said that she should explore that  
3 as an option.

4 Q. Did you tell her she would get  
5 extra money if she massaged Jeffrey?

6 A. I'm just saying, I cannot recall  
7 the exact conversation. I give career advice  
8 and I have done that.

9 Q. Did you ever have Johanna massage  
10 you?

11 A. I did.

12 Q. How many times?

13 A. I don't recall how many times.

14 Q. Was there sex involved?

15 A. No.

16 Q. Did you ever instruct Johanna to  
17 massage Glenn Dubin?

18 A. I don't believe -- I have no  
19 recollection of it.

20 Q. Did you ever have sexual contact  
21 with Johanna?

22 MR. PAGLIUCA: Object to the form  
23 and foundation. You need to give me an  
24 opportunity to get in between the  
25 questions.

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2 Anything that involves consensual  
3 sex on your part, I'm instructing you  
4 not to answer.

5 Q. Did you ever have sexual contact  
6 with Johanna?

7 A. Again, she is an adult --

8 Q. I'm asking you, did you ever have  
9 sexual contact with Johanna?

10 A. I've just been instructed not to  
11 answer.

12 Q. On what basis?

13 A. You have to ask my lawyer.

14 Q. Did you ever have sexual contact  
15 with Johanna that was not consensual on  
16 Johanna's part?

17 MR. PAGLIUCA: You can answer  
18 nonconsensual.

19 A. I've never had nonconsensual sex  
20 with anybody.

21 Q. Not Annie Farmer?

22 MR. PAGLIUCA: Objection.

23 A. I just testified I never had  
24 nonconsensual sex with anybody ever, at any  
25 time, at anyplace, at any time, with anybody.



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2 Q. So if Johanna were to testify that  
3 she did not consent to a sexual act that you  
4 participated in --

5 A. I just told you I have never ever  
6 under any circumstances with anybody, at any  
7 time, in anyplace, in any form had  
8 nonconsensual relations with anybody.

9 Q. Did you introduce Johanna to Prince  
10 Andrew?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I've, again, read that Johanna  
14 claimed that she met or that she said she met  
15 Prince Andrew. I don't know if I was the one  
16 who made the introduction or not.

17 Q. Do you know a female by the name of  
18 Emmy Taylor?

19 A. I do.

20 Q. How do you know her?

21 A. Emmy was my assistant.

22 Q. So she worked for you?

23 A. Yes.

24 Q. Did you hire her?

25 A. Again, Jeffrey hired people.

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2 Q. Did you have sex with her?

3 MR. PAGLIUCA: This is the same  
4 instruction about consensual or  
5 nonconsensual.

6 Q. Was Emmy under the age of 18 when  
7 you hired her?

8 A. No. I didn't hire her, as I said,  
9 Jeffrey did.

10 Q. Did Emmy ever have sex with  
11 Jeffrey?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. How would I know what somebody else  
15 did.

16 Q. You weren't involved in the sex  
17 between Jeffrey, Emmy and yourself?

18 A. We already --

19 Q. Were you involved with sex between  
20 Jeffrey, Emmy and yourself?

21 MR. PAGLIUCA: Everyone is talking  
22 over each other. You heard the  
23 question.

24 Again, you you know what the  
25 instruction is. If there is any

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2 consensual issue involved, I instruct  
3 you not to answer.

4 A. Moving on.

5 Q. So you are refusing to answer that  
6 question?

7 A. I've been instructed by my lawyer.

8 Q. Did you ever have sex with Jeffrey,  
9 Emmy, Virginia and yourself when Virginia was  
10 underage?

11 A. Absolutely not.

12 MR. PAGLIUCA: We've been going for  
13 about an hour. I would like to take a  
14 five-minute break, please.

15 MS. McCAWLEY: I'm almost done.

16 MR. PAGLIUCA: You are not going to  
17 allow a break.

18 MS. McCAWLEY: As soon as I get  
19 through my line of questioning, which is  
20 perfectly appropriate.

21 Q. Did Emmy Taylor travel with you and  
22 Jeffrey to Europe?

23 A. I'm sure she did.

24 Q. What is she doing today?

25 A. I have no idea.

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2 Q. Do you speak to her regularly now,  
3 do you speak to her?

4 A. No.

5 Q. Do you know where she lives?

6 A. No.

7 Q. Do you know what country she lives  
8 in?

9 A. No.

10 Q. Where is the last place you knew  
11 that she lived?

12 A. Last place I knew for sure was in  
13 Los Angeles.

14 Q. When did she stop working for you?

15 A. 2001, 2002.

16 Q. What tasks did she performance for  
17 you?

18 A. She helped me with moving in and  
19 out of houses, construction, she was a  
20 general help, she helped with buying things  
21 that needed to be purchased, if I needed her  
22 to stand in for me during meetings, it was a  
23 very wide ranging job.

24 Q. Did she ever bring females to  
25 perform massages for Jeffrey?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. What are you asking me?

5 Q. Did Emmy, was it ever Emmy's  
6 responsibility to bring females to the house  
7 for the purposes of massaging Jeffrey?

8 A. Emmy's job was to help me with the  
9 houses and work in homes. It was not her job  
10 to whatever you just said, bring masseuses.

11 Q. Did she do that?

12 A. I have no recollection. I have no  
13 idea.

14 Q. Did you pay Emmy or did Jeffrey pay  
15 her?

16 A. Jeffrey.

17 Q. Do you recall how much she was  
18 paid?

19 A. I do not.

20 MS. McCAWLEY: I think we can take  
21 a break now.

22 THE VIDEOGRAPHER: It's 10:02 and  
23 we are off the record.

24 (Recess.)

25 THE VIDEOGRAPHER: It's now 10:18.

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2 We are back on the record and starting  
3 disk No. 2.

4 Q. Ms. Maxwell, I asked you about  
5 Virginia Roberts earlier.

6 Can you describe what Virginia  
7 Roberts' duties were when she was with Mr.  
8 Epstein?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I believe that Virginia was a  
12 masseuse.

13 Q. Was Virginia required to dress up  
14 in any way for massages?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. I have no idea.

18 Q. Did you provide Virginia with  
19 outfits to wear for certain massages?

20 A. I have no idea what you are talking  
21 about.

22 Q. For example, did you ever provide  
23 Virginia with a school girl outfit to wear  
24 for a massage?

25 A. I have no idea what you are talking

1 G Maxwell - Confidential

2 about.

3 Q. So you didn't provide her with  
4 that?

5 A. As I just testified, I have no idea  
6 what you are talking about.

7 Q. I was trying to interpret whether  
8 you didn't understand what a school girl  
9 outfit was or you are saying that didn't  
10 happen?

11 A. I clearly know what a school girl  
12 outfit is. I have no recollection of  
13 providing anybody with a school girl outfit.

14 Q. Did you have a set of outfits used  
15 by the massage therapists that would include  
16 things like a school girl outfit or a black  
17 patent leather outfit or anything of that  
18 nature?

19 MR. PAGLIUCA: Object to the form  
20 and foundation.

21 A. That would be just another one of  
22 Virginia's lies.

23 Q. You didn't have anything like that?

24 A. I did not.

25 Q. Did you have a basket of sex toys

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2 that you kept in the Palm Beach house?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. First of all what do you mean.

6 Q. A laundry basket that contained sex  
7 toys in it?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. Can you ask the question again?

11 Q. Did you have a laundry basket that  
12 contained sex toys in it, in the Palm Beach  
13 House?

14 MR. PAGLIUCA: Objection to the  
15 form and foundation.

16 Q. Did you have a laundry basket of  
17 sex toys in the Palm Beach house?

18 MR. PAGLIUCA: Same objection.

19 Q. You can answer.

20 A. I don't recollect anything about a  
21 laundry basket of sex toys.

22 Q. Do you recollect having sex toys at  
23 the Palm Beach house?

24 A. You have to define what are you  
25 talking about.



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2 Q. A sex toy meaning a vibrator of  
3 some kind, sometimes they are called dildos,  
4 of that nature, anything like that?

5 A. I don't recollect anything that  
6 would formally be a dildo, anything like  
7 that.

8 Q. How would you describe sex toys?

9 A. I wouldn't describe sex toys.

10 Q. Did you have anything that was of  
11 an electronic nature that would be used  
12 during sex?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. I have no idea what you are  
16 referring to.

17 (Maxwell Exhibit 3, transcript,  
18 marked for identification.)

19 Q. Ms. Maxwell, I will show you what  
20 we are marking as Maxwell Exhibit 3.

21 If you look at the cover you will  
22 see it's a deposition transcript of Juan  
23 Alessi, do you know who Juan Alessi is?

24 A. I do.

25 Q. Who is he?

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2 A. He was somebody who Jeffrey hired  
3 who worked at the house in Palm Beach.

4 Q. I would like to have you turn to  
5 page, it should be page 76 of the actual  
6 transcript?

7 MR. PAGLIUCA: We have two  
8 transcripts.

9 Q. The mini version I think it is  
10 there.

11 A. I don't have page 76.

12 Q. So in the miniscript portion here,  
13 the beginning, there should be a page that  
14 looks like this, it's got a 76 at the top in  
15 the small square. Are you finding that, it's  
16 not too far back, I don't believe, it says  
17 page 19 the the bottom.

18 A. Okay.

19 Q. It's a miniscript like this. It  
20 has four squares?

21 MS. MENNINGER: 109 or 19.

22 MS. McCAWLEY: 19.

23 MR. PAGLIUCA: The Bates label is  
24 000109.

25 MS. McCAWLEY: Exactly.

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2 Q. I will direct your attention to  
3 page 76 in the deposition of Juan Alessi and  
4 it says, Would you describe for me what kinds  
5 of vibrators you found, question mark. The  
6 answer is, I'm not familiar, not too familiar  
7 with the names. They were big dildos, what  
8 they call big rubber things like that,  
9 indicating.

10 A. I can't find where you are looking.

11 Q. Page 76, right here.

12 A. I need to be able to read this. I  
13 will not be answering anything I have not  
14 read. You can read it out and then I will  
15 read it.

16 Q. Where was I. And I used to go and  
17 put on my gloves and pick them up and put  
18 them in the sink, rinse it off and put it in  
19 Ms. Maxwell's -- Ms. Maxwell had in her  
20 closet -- she had like a laundry basket, one  
21 of those laundry baskets that you put laundry  
22 in, she had full of these toys and that was  
23 -- that was me professionally leaving the  
24 room ready for the bed when they come back to  
25 the room again.

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2 Does that refresh your recollection  
3 that you had a laundry basket full of sex  
4 toys?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. First I have to read this.

8 Q. Sure.

9 MS. McCAWLEY: I will stop the  
10 clock while the witness is reading.

11 MR. PAGLIUCA: No.

12 MS. McCAWLEY: Yes, if she is going  
13 to read the whole document, I will stop  
14 the clock.

15 MR. PAGLIUCA: If you give her  
16 documents to refresh her recollection,  
17 we are on the clock here.

18 MS. McCAWLEY: Then we will take it  
19 up with the judge.

20 MR. PAGLIUCA: Read whatever you  
21 need to answer the question.

22 MS. McCAWLEY: I'm going to set the  
23 document aside and I'm just go to ask  
24 you a question, independent of the  
25 document.

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2 Q. Do you recall having a basket full  
3 of sex toys?

4 A. I already told you I did not.

5 Q. We were talking a moment ago about  
6 Ms. Roberts and her position as a masseuse,  
7 do you know what she was paid for working as  
8 a masseuse for Jeffrey Epstein?

9 A. I do not.

10 Q. Did you ever pay her?

11 A. I don't ever recall paying her.

12 Q. Do you know what happened during  
13 the massage appointments with Jeffrey Epstein  
14 and Virginia Roberts?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. No.

18 Q. Were you ever present to view a  
19 massage between Jeffrey Epstein and Virginia  
20 Roberts?

21 A. I don't recollect ever seeing  
22 Virginia and Jeffrey in a massage situation.

23 Q. Do you ever recollect seeing them  
24 in a sexual situation?

25 A. I never saw them in a sexual

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2 situation.

3 Q. Did you ever participate in sex  
4 with Virginia Roberts and Jeffrey Epstein?

5 A. I never ever at any single time at  
6 any point ever at all participated in  
7 anything with Virginia and Jeffrey. And for  
8 the record, she is an absolute total liar and  
9 you all know she lied on multiple things and  
10 that is just one other disgusting thing she  
11 added.

12 Q. Did you help her obtain an  
13 apartment in Palm Beach to live in?

14 MR. PAGLIUCA: Objection to the  
15 form and foundation.

16 Q. Was that part of your  
17 responsibilities for Jeffrey?

18 A. First of all, I didn't know she had  
19 an apartment in Palm Beach. I only learned  
20 that from the many times you guys have gone  
21 to the press to sell stories, so no.

22 Q. Did you help her get a cell phone,  
23 was that one of your responsibilities for  
24 Jeffrey, to get her is a cell phone as part  
25 of her masseuse obligations?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I don't know what that means,  
5 masseuse obligation, I don't know what you  
6 are referring to. Would you like to ask the  
7 question properly?

8 Q. I think it was proper. I will ask  
9 it again.

10 Did you ever assist in getting  
11 Virginia Roberts a cell phone to use during  
12 the time that she worked for Jeffrey Epstein?

13 A. I have no recollection of doing  
14 anything of that nature.

15 Q. Did you ever tell Virginia that you  
16 wanted her to have a cell phone so that she  
17 could be on call regularly?

18 A. I have no recollection of that  
19 conversation.

20 Q. How often would Virginia come over  
21 to the house in Palm Beach to give massages?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. Ask the question again, please.

25 Q. How often did Virginia Roberts come

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2 over to the house in Palm Beach to give  
3 massages?

4 A. It's important to understand that I  
5 wasn't with Jeffrey all the time. In fact, I  
6 was only in the house less than half the  
7 time, so I cannot testify to when I wasn't in  
8 the house how often she came when I wasn't  
9 there.

10 What I can say is that I barely  
11 would remember her, if not for all of this  
12 rubbish, I probably wouldn't remember her at  
13 all, except she did come from time to time  
14 but I don't recollect her coming as often as  
15 she portrayed herself.

16 Q. How many times a day on an average  
17 day would Jeffrey Epstein get a massage?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. When I was at the house and when I  
21 was there with him, he received a massage, on  
22 average, about once a day.

23 Q. Just once?

24 A. Yes.

25 Q. Were there days when he received



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2 four or five?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. When I was present at the house, I  
6 never saw something like that.

7 Q. Do you know if Virginia was  
8 required to be on call at all times to come  
9 to the house if Jeffrey wanted her there?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. I have no idea of the arrangements  
13 that Virginia made with Jeffrey.

14 Q. When Virginia was in New York,  
15 would Virginia sleep at Jeffrey's mansion in  
16 New York?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I don't recollect her being in New  
20 York and I have no idea where she slept.

21 Q. You don't ever remember seeing  
22 Virginia Roberts in New York?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. I would barely recollect her at

1 G Maxwell - Confidential

2 all, except for this story.

3 Q. Do you recall Virginia Roberts  
4 calling you because she was having a medical  
5 crisis and you and Jeffrey taking her to the  
6 hospital?

7 A. I have heard this absurd story and  
8 if any part of it were true I would remember  
9 that. I do not.

10 Q. You don't remember taking her to  
11 the hospital?

12 A. It's not that I don't remember it,  
13 it didn't happen.

14 Q. How do you know it didn't happen?

15 A. That's the sort of memory you would  
16 recall.

17 Q. Do you recall, you said you don't  
18 remember her being at the New York mansion.  
19 When you were in New York would you stay at  
20 the New York mansion with Jeffrey?

21 A. I stayed from time to time.

22 Q. Do you recall Virginia being at the  
23 New York mansion when Prince Andrew came to  
24 visit?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. Like I told you, I don't recall her  
4 being at the house at all.

5 Q. How many homes does Jeffrey have?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. When I was working for him, I think  
9 he had six maybe.

10 Q. Would Virginia stay with him in  
11 those homes?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. I can only testify for when I was  
15 present with him and I cannot say what she  
16 did when I wasn't present with him.

17 Q. When you were present, would  
18 Virginia stay in the homes with him?

19 A. I don't recall her staying in the  
20 houses.

21 Q. Did you train Virginia on how to  
22 recruit other girls for massages?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. No.

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2 Q. Did you train Virginia on how to  
3 recruit other girls to perform sexual  
4 massages?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. No. And it's absurd and her entire  
8 story is one giant tissue of lies and  
9 furthermore, she herself has -- if she says  
10 that, you have to ask her about what she did.

11 Q. Does Jeffrey like to have his  
12 nipples pinched during sexual encounters?

13 MR. PAGLIUCA: Objection to form  
14 and foundation.

15 A. I'm not referring to any advice on  
16 my counsel. I'm not talking about any adult  
17 sexual things when I was with him.

18 Q. When Jeffrey would have a massage,  
19 would he request that the masseuse pinch his  
20 nipples while he was having a massage?

21 A. I'm not talking about anything with  
22 consensual adult situation.

23 Q. What about with underage --

24 A. I am not aware of anything.

25 Q. You are not aware of Jeffrey

1 G Maxwell - Confidential

2 Epstein ever having sex with an underage  
3 minor and asking them to pinch his nipples?

4 A. I am not.

5 Q. So I'm going to direct you to, I  
6 believe it's Maxwell Exhibit 1, the police  
7 report.

8 Are you aware that over 30 under  
9 age minors gave testimony to police that they  
10 were engaged in sexual acts during,  
11 quote-unquote, massages.

12 MR. PAGLIUCA: The witness needs to  
13 find Exhibit 1. Exhibit 1 -- if you can  
14 hand me that please.

15 Q. So now with respect to the police  
16 report, are you aware that over 30 underage  
17 girls, meaning under the age of 18 gave  
18 reports to police that they were assaulted  
19 sexually by Jeffrey Epstein during massages?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I read the police report. That's  
23 all I can testify to.

24 Q. Are you aware of what is in the  
25 police report? Are you aware that there were

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2 30 girls --

3 A. I did not count the number of girls  
4 and I did read the police report. I can only  
5 testify to what I read.

6 Q. So you are aware that the police  
7 report contains reports from 30 underage  
8 girls?

9 A. I can't testify to what the girls  
10 said. I can only testify to the fact that I  
11 read a police report that stated that.

12 Q. Were you working for Jeffrey -- you  
13 said you worked for him off an on until 2009,  
14 is that correct?

15 A. I helped out from time to time.

16 Q. So you were working with him during  
17 the time period when these underage girls  
18 were visiting Jeffrey's home?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I was not -- what year, I need  
22 years.

23 Q. How about let's say 2005?

24 A. I'm not sure I was at the house at  
25 all in 2005, maybe one day, maybe.

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2 Q. How about 2004?

3 A. I was present for his mother's --  
4 his mother died in 2004 so I was there for  
5 his mother's death and the funeral and I was  
6 at the house maybe a handful of days, again.

7 Q. I would like to direct you to, you  
8 have it pulled together now, it's page 39,  
9 Bates stamped Giuffre 00040?

10 A. Can you repeat that, please.

11 Q. Sure. 00040.

12 A. Yes.

13 Q. At the top of that document, about  
14 three lines down, you see the redacted  
15 portions where there is black so it blacks  
16 out the name.

17 A. I see black redacted portions.

18 Q. That's a black redaction of the  
19 name of the minor and there is -- I will  
20 represent for the record that's what it is.  
21 You can contest that but I'm not asking about  
22 the name of the minor.

23 Five lines down, it says, She was  
24 just 16 years of age.

25 Do you see that?

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2 A. I have to read that, if you want me  
3 to testify to some things.

4 Q. I'm asking if you see where it  
5 says, She was just 16 years old.

6 A. No, I have to read it.

7 Q. It's five line downs on the first  
8 paragraph.

9 A. I do see that.

10 Q. Then the next paragraph down, it  
11 says, this is the next full paragraph, it  
12 says, Epstein entered the room, introduced  
13 himself, Epstein lay on the table and told  
14 her to get comfortable, blank could not  
15 remember if he was naked or if he entered the  
16 room with a towel. Blank stated she provided  
17 the massage wearing her panties. She  
18 continued rubbing his thighs and feet. Blank  
19 advised he turned over on his back and  
20 continued to rub his legs with oil. Epstein  
21 touched her breast and began to masturbate.  
22 I asked if she knew what circumcised and  
23 uncircumcised meant. She stated circumcised  
24 is when the penis had no foreskin.

25 Then jumping down to the next



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2 paragraph, it says, Blank became upset,  
3 crying hysterically and stated she was paid  
4 and also instructed to have sex with Epstein  
5 and Nadia Marcinkova by Epstein.

6 Do you see that there?

7 A. I do.

8 Q. Are you aware that there were  
9 underage minors in the Palm Beach house that  
10 were required to give sexual massages to  
11 Jeffrey Epstein?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation. This has been  
14 asked and answered already. Now you are  
15 just reading a document.

16 MS. McCAWLEY: I am allowed to take  
17 this deposition.

18 A. I already testified --

19 Q. Are you aware there were underage  
20 girls, 30 of them, in this police report that  
21 were assaulted by Jeffrey Epstein in the Palm  
22 Beach house during the time you are working  
23 there?

24 A. I am aware that Virginia has  
25 lied repeatedly --

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2 Q. I'm not asking about Virginia. I'm  
3 asking if you are aware that there were over  
4 30 underage girls who gave reports to police  
5 officers during the time you worked for  
6 Jeffrey Epstein. Are you aware of that?

7 MR. PAGLIUCA: Counsel, what is  
8 your factual basis for asserting there  
9 are 30 underaged people who gave  
10 reports?

11 MS. McCAWLEY: I don't have to  
12 answer that.

13 MR. PAGLIUCA: Are you representing  
14 as an officer of the court that you have  
15 personal knowledge that there are 30  
16 people referenced in these police  
17 reports?

18 MS. McCAWLEY: That's my  
19 understanding, that there are 30 girls.

20 MR. PAGLIUCA: How is that your  
21 understanding if these are redacted  
22 reports?

23 MS. McCAWLEY: By reading through  
24 the reports.

25 MR. PAGLIUCA: So you have personal

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2 knowledge there are 30 people --

3 MS. McCAWLEY: Just like can you if  
4 you read through -- I will not argue  
5 with you counsel.. she can answer yes or  
6 no.

7 Q. Are you aware there were over 30  
8 individuals who were minors who gave reports  
9 to police just like the one we just read that  
10 they were sexually assaulted by Jeffrey  
11 Epstein in the Palm Beach home during the  
12 years that you were working with him?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation. You can answer if  
15 you have knowledge.

16 A. I already testified I was limited  
17 in the house, a couple of days, there is no  
18 way I knew. I have read these reports. I  
19 cannot testify to 30. Given the experience  
20 I've had with Virginia's lies, it's very hard  
21 for me to testify about what I see. I can  
22 tell from you my personal knowledge I did not  
23 know what you are referring to.

24 Q. You did not know there were  
25 underage girls in the home that were being

1 G Maxwell - Confidential

2 assaulted by Jeffrey Epstein during the time  
3 you were working there?

4 A. Based on the lies that I have  
5 already been told, I cannot comment on any --

6 Q. Are you saying these 30 girls are  
7 lying when they gave these reports to police  
8 officers?

9 A. I'm not testifying to their lies.  
10 I'm testifying to Virginia's lies.

11 Q. I am not asking about Virginia's  
12 lies.

13 A. I can only testify to Virginia's  
14 lies. I can testify to having read these  
15 reports. I cannot testify to anything else  
16 about them.

17 Q. So your testimony is that during  
18 the time you were working there, you did not  
19 know that these minor children were being  
20 abused in the home while you were there?

21 A. What I have already told you and I  
22 will repeat, I was in the house very limited  
23 times, very few times. I do not know what  
24 you are referring to. I've read these  
25 reports but based on the lies that Virginia

1 G Maxwell - Confidential

2 has perpetrated, cannot tell you what is true  
3 or factual or not.

4 Q. You said you were in the home a  
5 very limited time, so average in the year for  
6 example, 2004, how many times would you have  
7 been in his Palm Beach home?

8 A. Very hard for me to state but very  
9 little.

10 Q. How about his New York home?

11 A. Same.

12 Q. Were you his girlfriend in that  
13 year, in 2004?

14 A. Define what you mean by girlfriend.

15 Q. Were you in a relationship with him  
16 where you would consider yourself his  
17 girlfriend?

18 A. No.

19 Q. Did you ever consider yourself his  
20 girlfriend?

21 A. That's a tricky question. There  
22 were times when I would have liked to think  
23 of myself as his girlfriend.

24 Q. When would that have been?

25 A. Probably in the early '90s.

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2 Q. In your responsibilities in working  
3 for Jeffrey, would you book massages for him  
4 on any given day so that he would have a  
5 massage scheduled? Would you take a call for  
6 example and book a massage for him?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 Q. You can answer.

10 A. Typically, that was not my  
11 responsibility. He would either book the  
12 massage himself or one of his other  
13 assistants would do that.

14 Q. From time to time you had to do  
15 that?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. Like I said, typically it was  
19 somebody else's responsibility.

20 Q. If you were unable to book a girl  
21 for a massage on a given day, would that mean  
22 that you were responsible for giving him a  
23 sexual massage?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation and I instruct you

1 G Maxwell - Confidential

2 not to answer any questions about any of  
3 your consensual adult sexual activity.

4 Q. So you are not going to answer that  
5 question?

6 A. You just heard my counsel.

7 Q. Have you ever said to anybody that  
8 recruiting other girls to perform sexual  
9 massages for Jeffrey Epstein takes the  
10 pressure off you?

11 MR. PAGLIUCA: Object to the form  
12 and foundation.

13 A. Repeat the question and break it  
14 out.

15 Q. Have you ever said to anybody that  
16 you recruit girls --

17 A. Stop right there. I never  
18 recruited girls, let's stop there. Now  
19 breakdown the question.

20 Q. Have you ever said to anybody --

21 A. By girls, we are talking about  
22 underage people -- you said girls, are you  
23 talking about underage -- we are not talking  
24 about consensual acts -- this is a defamation  
25 suit.

1 G Maxwell - Confidential

2 Q. I'm asking the questions. I know  
3 what this case is about. I'm trying to -- I  
4 will ask you questions if you don't  
5 understand the question I can break it down  
6 for you. I'm happy to do that.

7 A. Break it down a lot please.

8 Q. I will do that.

9 The question is, have you ever said  
10 to anybody that you recruit other girls --

11 A. Why don't you stop there.

12 Q. Let me finish my question.

13 Have you ever said to anybody that  
14 you recruit girls to take the pressure off  
15 you, so you won't have to have sex with  
16 Jeffrey, have you said that?

17 That's the question?

18 A. You don't ask me questions like  
19 that. First of all, you are trying to trap  
20 me, I will not be trapped. You are asking me  
21 if I recruit, I told you no. Girls meaning  
22 underage, I already said I don't do that with  
23 underage people and as to ask me about a  
24 specific conversation I had with language, we  
25 talking about almost 17 years ago when this



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2 took place. I cannot testify to an actual  
3 conversation or language that I used with  
4 anybody at any time.

5 Q. Have you ever said to anybody that  
6 you recruit other females over the age of 18  
7 to take the pressure off you to having to  
8 have sex with Jeffrey?

9 A. I totally resent and find it  
10 disgusting that you use the word recruit. I  
11 already told you I don't know what you are  
12 saying about that and your implication is  
13 repulsive.

14 Q. Answer my question.

15 A. I just did.

16 Q. Have you ever said to anybody that  
17 you recruit females --

18 A. I don't recruit anybody.

19 Q. That's an answer. So you never  
20 said that?

21 A. I'm testifying that I cannot  
22 testify to an actual language --

23 Q. It's a yes or no.

24 A. I will not testify to an actual  
25 statement made 17 years ago, so I cannot

1 G Maxwell - Confidential

2 testify to actual language.

3 Q. So you won't testify to anything  
4 I'm asking you 17 years ago about a statement  
5 you made. How do you know it's 17 years ago?

6 A. We are talking about a time in  
7 2000, right?

8 Q. Have you ever said that to anybody?

9 A. I'm 54 years old so you are asking  
10 me in my entire life, what words are you  
11 asking me in my entire life?

12 Q. Your entire life is limited by the  
13 time you were with Jeffrey, this is the  
14 question.

15 A. Let's time limit the question you  
16 are asking me.

17 Q. So from, let's say, I think you  
18 said you started with him in 1992, is that  
19 correct, and finished with him in 2009.

20 So from 1992 to 2009 have you ever  
21 said to anybody that you recruit other and we  
22 will start with girls to take the pressure  
23 off you to have sex with Jeffrey?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. First of all I resent and despise  
3 the world recruit. Would you like to define  
4 what you mean by recruit and by girls, you  
5 mean underage people. I never had to do  
6 anything with underage people. So why don't  
7 you reask the question in a way that I am  
8 able to answer it.

9 Q. I'm asking if you ever said that to  
10 anybody. So if you don't understand the word  
11 recruit and you never used that word then the  
12 answer to that question would be no.

13 A. I have no memory as I sit here  
14 today having used that word.

15 Q. Did you ever meet an underage girl  
16 in London to introduce her to Jeffrey to  
17 provide him with a massage?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. Run that past me one more time.

21 Q. Did you ever meet an underage girl  
22 in London to introduce her to Jeffrey to  
23 perform a massage?

24 MR. PAGLIUCA: Same objection.

25 A. Are you asking me if I met anybody

1 G Maxwell - Confidential

2 that was underage in London specifically to  
3 provide a massage to Jeffrey, is that your  
4 question?

5 Q. Yes.

6 A. No.

7 Q. Do you know who Alexander Dixon is?

8 A. I don't recall her right now.

9 Q. Do you know if -- strike that.

10 During the time that you were  
11 working for Jeffrey, did you ever observe any  
12 foreign females, so in other words, not from  
13 the United States, that were brought to  
14 Jeffrey's home to perform massages?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. Females, what age are we talking?

18 Q. Any age.

19 A. Can you repeat the question?

20 Q. During the time you were working  
21 for Jeffrey, did you ever observe any foreign  
22 females of any age that were at Jeffrey's  
23 home to perform a massage?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. Are you asking me if any foreigner,  
3 not an American person, gave Jeffrey a  
4 massage?

5 Q. Yes.

6 A. Well, as I sit here today, I can't  
7 think of anyone who is foreign. Certainly --  
8 I just can't think of anybody right this  
9 second.

10 Q. How about any foreign girls who  
11 were under the age of 18?

12 A. I already testified to not knowing  
13 anything about underage girls.

14 Q. Were there foreign girls who were  
15 brought to Jeffrey's home by Jean Luc Brunel  
16 for the purposes of providing massages?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I am not aware of Jean Luc bringing  
20 girls. I have not no idea what you are  
21 talking about.

22 Q. You have never been around foreign  
23 girls who are under the age of 18 at  
24 Jeffrey's homes?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I already testified about not  
4 knowing about underage girls.

5 Q. Did you provide any assistance with  
6 obtaining visas for foreign girls that were  
7 under the age of 18?

8 A. I've never participated in helping  
9 people of any age to get visas.

10 Q. Did Jeffrey, was it Jeffrey's  
11 preference to start a massage with sex?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. I think you should ask that  
15 question of Jeffrey.

16 Q. Do you know?

17 A. I don't believe that was his  
18 preference. I think -- you have to  
19 understand, a massage -- perhaps you are not  
20 really familiar with what massage is.

21 Q. I am, I don't need a lecture on  
22 massage.

23 A. I think you do.

24 MR. PAGLIUCA: No question pending.

25 She will ask you another question now.

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2 A. Massage is for health benefits.

3 Q. When did you first meet Jeffrey?

4 A. Some point in 1991.

5 Q. And did Jeffrey know your father?

6 A. No.

7 Q. How were you introduced to Jeffrey?

8 A. Some friend introduced us.

9 Q. Can you describe your relationship  
10 back in 1991, was it friendship or was it  
11 girlfriend relationship or was it a work  
12 relationship, what was your relationship in  
13 1991?

14 A. It was just friendly.

15 Q. Then I believe you testified you  
16 began working for him in 1992, is that  
17 correct?

18 A. Yes.

19 Q. In 1992 I know you gave me the  
20 description of the work that you were  
21 performing for him, how much was he paying  
22 you, do you remember?

23 A. I don't recall.

24 Q. Do you know for example in 2001 how  
25 much he was paying you?

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2 A. I don't recall.

3 Q. Did it change over the years or did  
4 the payment remain the same?

5 A. I believe over the course of time  
6 it increased a little bit.

7 Q. Was that the -- was that payment  
8 the payment that -- was the payment made with  
9 respect to the jobs, the work you were  
10 performing for Jeffrey, was that your sole  
11 income at that time?

12 MR. PAGLIUCA: I object to the  
13 form. I'm also going to instruct you  
14 not to answer about sources of -- your  
15 personal sources of income outside of  
16 Mr. Epstein at all.

17 MS. McCAWLEY: What's the basis for  
18 that?

19 MR. PAGLIUCA: It's confidential,  
20 it's not part of this lawsuit.

21 MS. McCAWLEY: We have a protective  
22 order and it is part of this lawsuit  
23 with respect to our damage claims.

24 MR. PAGLIUCA: It's not and, in  
25 fact, you are not entitled to ask



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2 financial information of a defendant in  
3 this kind of case, in a defamation case  
4 unless and until there is a finding that  
5 you are entitled to punitive damages.  
6 That is clear in New York case law, both  
7 state and Federal.

8 MS. McCAWLEY: We disagree on that  
9 point and we will come back to that.

10 Q. From the source of payment from the  
11 source of Jeffrey, from your work, can you  
12 give me a range on that, do you know was it  
13 over \$100,000?

14 A. I just testified I don't recall.

15 Q. You don't don't know if it was  
16 \$500,000?

17 A. It was less than that.

18 Q. Somewhere between 100 and 500,  
19 would that be fair to say?

20 A. I believe it was between 100 and  
21 \$200,000.

22 Q. Did Jeffrey during the time that  
23 you were working for him purchase a town home  
24 for you?

25 A. The subject of the townhouse is, I

1 G Maxwell - Confidential

2 worked for it and I had a loan, we did loans.

3 Q. So a loan through Jeffrey?

4 A. I don't recall the exact  
5 transaction.

6 Q. Did he purchase for you a  
7 helicopter during the time you were working  
8 for him?

9 A. It was his helicopter.

10 Q. When did you obtain your pilot  
11 license?

12 A. I believe it was '98 or '99.

13 Q. Was that for both airplanes and  
14 helicopters or just helicopters?

15 A. Just helicopters.

16 Q. Have you ever flown President  
17 Clinton on your helicopter?

18 A. That is another one of Virginia's  
19 lies.

20 Q. The question is have you ever done  
21 that?

22 A. I have never flown President  
23 Clinton at any time ever, in any helicopter,  
24 in any place, any time, in any state, in any  
25 country, at any time anywhere.

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2 Q. Have you ever had dinner with  
3 President Clinton at Jeffrey's home, at any  
4 of Jeffrey's homes?

5 A. No, I don't believe so.

6 Q. Have you traveled on Jeffrey's  
7 planes with President Clinton?

8 A. Yes, I have.

9 Q. Would that have been in 2002?

10 A. It's very hard for me to recollect  
11 exact dates but that sounds about right.

12 Q. Was that during the time that  
13 Virginia was working for Jeffrey?

14 A. I don't know that Virginia ever did  
15 work for Jeffrey. I don't exactly know if  
16 she testified to her so-called duties, we  
17 know she is a serial liar so I can't testify  
18 to what she did or didn't do. So I object to  
19 that characterization of her. So repeat the  
20 question, please.

21 Q. Can you read the question back?

22 (Record read.)

23 Q. You can answer the question.

24 A. What was the question again?

25 Q. When you were traveling on the

1 G Maxwell - Confidential  
2 plane with President Clinton, was that during  
3 the time, it was 2002, that you were on a  
4 flight with Clinton, was that during the time  
5 Virginia was working for Jeffrey?

6 MR. PAGLIUCA: Object to the form.  
7 Misstates the witness' answer and if you  
8 can answer the question, you can answer  
9 it.

10 A. Well, like I said, I don't recall  
11 exactly when I flew with him. I don't recall  
12 when Virginia, we know what Virginia claims  
13 when she left, so I can't answer the  
14 question. I have no idea.

15 Q. Do you know Prince Andrew?

16 A. I do.

17 Q. How long have you known him?

18 A. A very long time.

19 Q. Since you were a child?

20 A. I really -- it's so long, it's  
21 really a long time ago. I just don't recall.

22 Q. Do you remember how you first met  
23 him?

24 A. No, I do not.

25 Q. Did you introduce him to Jeffrey?

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2 A. That would be another of Virginia's  
3 lies and the lies you perpetrate. I never  
4 introduced Prince Andrew to Jeffrey Epstein  
5 at any time ever, so just add that the to  
6 long list of lies.

7 Q. Did Jeffrey know Prince Andrew?

8 A. Clearly he knew him. I think we  
9 have that answer but how -- yeah.

10 Q. Do you know how Jeffery met Prince  
11 Andrew?

12 A. I do not know Jeffrey met Prince  
13 Andrew. What I do know is that I did not  
14 introduce them. That is one of the many  
15 lies. Are we tallying all the lies?

16 Q. Do you know when Jeffrey met Prince  
17 Andrew?

18 A. I do not know when Jeffrey met  
19 Prince Andrew.

20 Q. Did you ever introduce Prince  
21 Andrew to any girls under the age of 18 who  
22 were not friends of yours children?

23 A. I have not introduced Prince Andrew  
24 to anyone that I am aware of other than  
25 friends of mine who have kids under that age

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2 that he may have met socially through me.

3 Q. Did you ever introduce Prince  
4 Andrew to Virginia in London?

5 A. I understand her story about London  
6 but again, her tissue of lies is extremely  
7 hard to pick apart what is true and what  
8 isn't. Actually I wouldn't recollect her at  
9 all but for her tissue stories about this  
10 situation.

11 Q. So did you ever introduce Prince  
12 Andrew to Virginia in London?

13 A. I have no recollection.

14 Q. Did Virginia ever stay at your home  
15 in London, your town home?

16 A. I know she claims she did but if  
17 you are asking me here today to remember  
18 specifically, I cannot.

19 Q. Do you remember taking a trip with  
20 Virginia to travel over to Europe, including  
21 London?

22 A. So I have seen her reports and I  
23 have seen the plane reports. I see she says  
24 she was on that but again, I really have no  
25 recollection of her.

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2 Q. Did you know that she was 17 at the  
3 time of that trip?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I have --

7 Q. Did you know she was 17 at the time  
8 of that trip?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I didn't even know she was on the  
12 trip.

13 Q. Did you hold her passport for her  
14 when she was traveling?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. I have no recollection whatsoever  
18 of her even being on the trip nor holding her  
19 passport.

20 (Maxwell Exhibit 4, picture, marked  
21 for identification.)

22 Q. I'm showing you what we marked as  
23 Maxwell Exhibit 4.

24 Can you take a look at that picture  
25 for me?

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2 A. I've looked at it.

3 Q. Are you in that picture?

4 A. I am.

5 Q. Is that Prince Andrew in the  
6 picture as well?

7 A. It is.

8 MR. PAGLIUCA: I don't believe this  
9 has been produced to us in discovery by  
10 you.

11 MS. McCAWLEY: The picture?

12 MR. PAGLIUCA: Yes.

13 MS. McCAWLEY: It has.

14 MS. MENNINGER: Is it the same  
15 exact photograph.

16 MS. McCAWLEY: I believe so. We  
17 will find one. The picture has been  
18 produced a number of times.

19 MR. PAGLIUCA: I've seen different  
20 iterations of this, I don't believe I  
21 have ever seen this.

22 MS. McCAWLEY: We had them blow it  
23 up on a page so she could see it. We  
24 could use an article.

25 While you are looking for that, I



1 G Maxwell - Confidential

2 will skip ahead. Hold that until we can  
3 find one that has the Bates range on it.

4 Q. Do you recall Virginia being at  
5 your London town home?

6 A. I do not.

7 Q. Do you recall going to dinner with  
8 Prince Andrew, Jeffrey Epstein and Virginia  
9 Roberts in London, at any time?

10 A. I do not.

11 Q. Do you recall going to a place  
12 called Club Tramp with Prince Andrew, Jeffrey  
13 Epstein and yourself and Virginia Roberts?

14 A. I would just like to state for the  
15 record that Prince Andrew is a very famous  
16 person, I know you are aware because you like  
17 to use him so often in your press stories --  
18 please let me finish. Were he at Tramp, at  
19 any time, that would be reported by the  
20 press. I do not have any recollection of it  
21 and I doubt it actually happened.

22 Q. You don't recall that.

23 Do you recall taking Virginia  
24 shopping when you were in London to buy an  
25 outfit to meet Prince Andrew?

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2 A. No, I don't.

3 Q. Where in your town home -- we will  
4 come back to that.

5 Do you have guest bedrooms in your  
6 town home in London?

7 A. I do.

8 Q. How many?

9 A. Two.

10 Q. Did Prince Andrew ever visit  
11 Jeffrey and you in New York?

12 A. Yes.

13 Q. Do you remember him visiting you  
14 and Jeffrey in New York in the spring of  
15 2001?

16 A. Again, I can't testify to any  
17 specific dates.

18 Q. So you don't have a recollection of  
19 that?

20 A. I have a recollection -- you've  
21 asked me if I have a recollection of being in  
22 New York but if you are asking for a date, I  
23 cannot confirm that date.

24 Q. Do you remember Prince Andrew being  
25 present in New York for a party where Johanna

1 G Maxwell - Confidential

2 Sjoberg was also present?

3 A. I don't recollect.

4 Q. Do you recall ever giving Prince  
5 Andrew a gift of a puppet that was in the  
6 same -- that looked like him?

7 A. I never gave him a gift of a  
8 puppet.

9 Q. Did Jeffrey ever give him a gift of  
10 a puppet?

11 A. No, not that I am aware of.

12 Q. Have you ever given him any gifts?

13 MR. PAGLIUCA: Objection,  
14 foundation.

15 A. I know Andrew --

16 Q. Have you ever given him any gifts  
17 that you remember when he came to Jeffrey's  
18 home in New York?

19 A. I don't recall giving him any gifts  
20 in New York.

21 (Maxwell Exhibit 5, picture, marked  
22 for identification.)

23 Q. I think I directed you to page  
24 0034.

25 Is that a picture that was taken at

1 G Maxwell - Confidential

2 your London town home?

3 A. I have no idea what this picture  
4 was taken. I know what she purports it to be  
5 but I'm not going to say that I do.

6 Q. Do the surroundings look like your  
7 London town home?

8 A. They are familiar.

9 Q. Do you know who took this picture?

10 A. I do not.

11 Q. Did Jeffrey Epstein take the  
12 picture?

13 A. I just testified I don't know who  
14 took the picture.

15 Q. So you don't know if Jeffery  
16 Epstein took the picture?

17 A. When I tell you I don't know who  
18 took the picture, it doesn't mean him -- I  
19 don't know who took the picture. You can  
20 come up with 50 names, I still do not know  
21 who took the picture.

22 Q. Did you observe Prince Andrew go  
23 into a room with Virginia alone in your town  
24 home?

25 A. I cannot recall. As I have said,

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2 no.

3 Q. Did Prince Andrew ever tell you  
4 that he had sex with Virginia Roberts?

5 A. He did not.

6 Q. Did Jeffrey Epstein ever tell you  
7 that Prince Andrew had sex with Virginia  
8 Roberts?

9 A. He did not.

10 Q. Did Prince Andrew ever visit -- let  
11 me back up for a moment. We talked about  
12 Jeffrey's homes, did Jeffrey have a home in  
13 the U.S. Virgin islands called Little St.  
14 James?

15 A. Yes.

16 Q. Did Prince Andrew ever visit that  
17 island -- are you aware of Prince Andrew ever  
18 visiting Jeffrey's island?

19 A. I am aware of that, yes.

20 Q. Do you know how many times he  
21 visited?

22 A. I do not.

23 Q. Do you know if he visited when  
24 Virginia was on the island?

25 A. I do not.

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2 Q. Were you present on the island when  
3 Prince Andrew visited?

4 A. Yes.

5 Q. How many times?

6 A. I can only remember once.

7 Q. Were there any girls under the age  
8 of 18 on the island during that one visit  
9 that you remember that were not family or  
10 friends of or daughters of your friends?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. There were no girls on the island  
14 at all. No girls, no women, other than the  
15 staff who work at the house. Girls meaning,  
16 I assume you are asking underage, but there  
17 was nobody female outside of the cooks and  
18 the cleaners.

19 Q. Did you, as part of your duties in  
20 working for Jeffrey, ever arrange for  
21 Virginia to have sex with John Luc Brunel?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. Just for the record, I have never  
25 at any time, at anyplace, in any moment ever

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2 asked Virginia Roberts or whatever she is  
3 called now to have sex with anybody.

4 Q. Did you ever provide Virginia  
5 Roberts with an outfit, an outfit of a sexual  
6 nature to wear for Les Wexner?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I think we addressed the outfit  
10 issue.

11 Q. I am asking you if you ever  
12 provided her with an outfit of a sexual  
13 nature to wear for Les Wexner?

14 A. Categorically no. You did get  
15 that, I said categorically no

16 Q. Don't worry I'm paying attention.

17 A. You seemed very distracted in that  
18 moment.

19 (Maxwell Exhibit 6, flight logs,  
20 marked for identification.)

21 A. Do you mind if I take a break for  
22 the bathroom.

23 Q. It's 11:08 and we are going to go  
24 off the record now.

25 THE VIDEOGRAPHER: It's now 11:09.

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2 We are off the record.

3 (Recess.)

4 THE VIDEOGRAPHER: It's now 11:26,  
5 we are back on the record and starting  
6 disk No. 3.

7 Q. Ms. Maxwell, I think I handed you  
8 right before the break, did I hand you the  
9 flight logs, they look like this. Did I mark  
10 those yet, I thought I did.

11 A. I don't believe I have it.

12 Q. These admittedly are a little  
13 difficult to read so what I'm going to  
14 provide you with to assist is I have a chart  
15 that has the airport codes, because it will  
16 have, for example, just for the record  
17 reflects that the first page of document  
18 [REDACTED] it will have a code in the from line  
19 that says PBI, for example, to TEB so I a  
20 chart that matches up, just in case you don't  
21 understand what those letters mean, PBI  
22 meaning Palm Beach, TEB meaning Teterboro,  
23 which is New Jersey, but others are more  
24 difficult but just for you to be able to  
25 understand the logs, I will provide you with



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2 that.

3 MR. PAGLIUCA: So we are clear, if  
4 the witness has personal knowledge of  
5 what these are that's fine but I don't  
6 know what these are and I don't expect  
7 the witness to accept the representation  
8 that they are what they are.

9 MS. McCAWLEY: If she can testify  
10 to what city it is, she can state that  
11 on the record.

12 MR. PAGLIUCA: If she knows what it  
13 is, she knows what it is, we are not  
14 putting any affirmatively on the record  
15 until you ask your questions.

16 Q. So I'm going to ask you and I think  
17 we flagged a few of the pages which may  
18 direct us a little bit easier but I will do  
19 it by Bates number which is at the bottom of  
20 the document kind of at the side.

21 The first I will direct your  
22 attention to is [REDACTED]

23 A. Does it have a tab?

24 Q. It should. Let me make sure.

25 A. Yes it does.

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2 Q. So I'm directing your attention to  
3 the bottom, two lines up from the bottom,  
4 there is a flight --

5 MR. PAGLIUCA: Are you on [REDACTED]

6 MS. McCAWLEY: [REDACTED]

7 Q. So this flight is from, the one I'm  
8 looking at, I think it's highlighted on your  
9 copy. On the far corner on the date, it says  
10 [REDACTED] at the top and this would be the [REDACTED]  
11 and then the [REDACTED] are the two I'm going to  
12 direct your attention to.

13 Q. On that first one on the [REDACTED] you  
14 will see the column reading PBI in the from  
15 column to TEB in the to column and you will  
16 see some initials, you will see JE for  
17 Jeffrey Epstein, GM for Ghislaine Maxwell, ET  
18 for Emmy Taylor and then Virginia?

19 A. I have to object.

20 MR. PAGLIUCA: You don't get to  
21 object.

22 Q. She is turning into a lawyer  
23 already?

24 A. I would like to.

25 Q. Let me ask the question and if you

1 G Maxwell - Confidential  
2 have an issue -- so with respect to this  
3 flight, do you recall being on a flight in  
4 the -- [REDACTED] going from Palm Beach to  
5 Teterboro?

6 A. No, I don't recall any specific  
7 flight.

8 Q. Do you recall flying with Virginia  
9 on a flight with Emmy Taylor and Jeffrey  
10 Epstein at any time?

11 A. I don't.

12 Q. How often did you fly on a plane  
13 with a 17 year old?

14 MR. PAGLIUCA: Objection to form  
15 and foundation.

16 A. I have no idea what you are talking  
17 about, other than friends of mine that had  
18 kids.

19 Q. Did you regularly fly on Jeffrey's  
20 plane with individuals who were under the age  
21 of 18?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. Can you repeat the question?

25 Q. Did you regularly fly on Jeffrey

1 G Maxwell - Confidential

2 Epstein's planes with individuals who were  
3 under the age of 18?

4 A. I regularly flew on Jeffrey  
5 Epstein's airplane but I cannot testify as to  
6 flying with people under the age. I don't  
7 believe that I did.

8 Q. Why wouldn't you remember flying  
9 with a 17 year old?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. How would I know, one, that she is  
13 17, how would you know that, how do you know  
14 I'm on the plane.

15 Q. Are you saying you are not on this  
16 flight, so this is a Palm Beach to Teterboro.  
17 This says the JE, GM ET and Virginia. The GM  
18 you are saying is not you?

19 MR. PAGLIUCA: I object to the  
20 form. You can answer the question if  
21 you know.

22 A. How do you know the GM is me.

23 Q. Is it your testimony that on the  
24 flight logs when it represents GM that it is  
25 not you flying on the plane?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. GM can stand for any level, it  
5 could be Georgina, George.

6 Q. Are there any people that flew with  
7 Jeffrey Epstein that had the initials GM?

8 A. I don't know.

9 Q. Do you recall flying with Jeffrey  
10 Epstein on his plane over 300 times during  
11 the period of 1999 to 2005?

12 A. I cannot testify to how many times  
13 I was on his plane because that would just be  
14 impossible.

15 Q. You were on his plane regularly,  
16 would you say?

17 A. I already testified I was on his  
18 plane regularly.

19 Q. Is it your testimony and I'm  
20 referring now to the line that we were just  
21 talking about that you were not on the flight  
22 from Palm Beach to Teterboro that lists JE,  
23 GM, ET and Virginia?

24 A. I am not testifying to that. I am  
25 just saying that you cannot be sure that is

1 G Maxwell - Confidential

2 me.

3 Q. So as you sit here today, you don't  
4 believe you flew on that plane?

5 A. I'm not saying that. I'm just  
6 saying you cannot be sure that's me.

7 Q. Do you have reason to doubt that  
8 when it says GM on these flight logs that  
9 that represents you?

10 A. I cannot testify to that. I'm just  
11 saying it may not be me.

12 Q. In looking at the flight logs and  
13 look up, let's move up a couple of lines. If  
14 you start at the top, you are going to see  
15 JE, [REDACTED], then JE, AP, [REDACTED],  
16 JE, AP [REDACTED], JE, GM, JE, GM, JE, GM,  
17 Ricardo Loretta, reposition, JE, GM, JE, GM  
18 ET Kelly Spamm, JE, GM, Kelly Spamm, Tom  
19 Pritzer, female, Marham Air Force  
20 repositioning. JE, GM, ET, Kelly Spamm, JE,  
21 GM, ET, Kelly Spamm, JE, GM, ET, Virginia,  
22 JE, GM, AP, Virginia, repositioning and then  
23 a certification.

24 So is it your testimony in looking  
25 at that that you do not believe that the GM

1 G Maxwell - Confidential

2 represents you?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. I'm not saying that. I'm just  
6 saying that you cannot -- I can't sit here  
7 and tell you for sure GM is me and I cannot  
8 testify remembering being on a flight at that  
9 time.

10 Q. You don't remember being on any of  
11 these flights with the initial GM?

12 A. I remember being on many flights.  
13 I cannot testify that is a flight I am on.

14 Q. Let's go to the next page which is  
15 going to be [REDACTED] I want you to look at  
16 line -- so the date is at the top, so it's  
17 [REDACTED] and if you go down, you will see  
18 a line that says the [REDACTED] and if you scroll  
19 over you will see PBI to TIST, if you look at  
20 the airport codes, TIST is going to be  
21 representative for the U.S. Virgin Islands  
22 and then you will see the list on the plane  
23 JE, GM, ET and Virginia Roberts.

24 Do you recall flying from Palm  
25 Beach to the U.S. Virgin Islands with

1 G Maxwell - Confidential

2 Jeffrey, yourself, Emmy Taylor and Virginia  
3 Roberts?

4 MR. PAGLIUCA: I object to the form  
5 and just so the record is clear, we  
6 don't agree with whatever your  
7 characterizations are. The document  
8 speaks for itself and she can answer  
9 based on whatever her personal knowledge  
10 is.

11 MS. McCAWLEY: I understand.

12 Q. Do you recall flying with those  
13 individuals from Palm Beach to the U.S.  
14 Virgin Islands?

15 A. I have no recollection of any  
16 individual flight you are pointing out here.  
17 You are talking about 2001, how many years  
18 ago is that?

19 Q. I'm asking the questions.

20 A. I'm not being difficult. I'm just  
21 asking, it's like 14, 15 years ago, it's  
22 impossible, I'm sorry.

23 Q. So your testimony is you don't  
24 recall flying on that flight with Virginia  
25 Roberts?



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2 A. I cannot testify to that flight.

3 Q. Let's look at the next flight which  
4 is on the [REDACTED] from the Virgin Islands back  
5 to Palm Beach, JE, Jeffrey Epstein, Ghislaine  
6 Maxwell, Emmy Taylor, Virginia Roberts, the  
7 same individuals on the above flight.

8 A. It doesn't say my name, it has some  
9 initials.

10 Q. I understand, the initials GM.  
11 Do you recall flying on a plane, on  
12 one of Jeffrey's planes from the Virgin  
13 Islands to Palm Beach with Virginia Roberts?

14 A. I do not.

15 Q. Was there any other person that  
16 flew with Jeffrey Epstein with frequency  
17 during that time period in these logs that  
18 have the initials GM?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I would have to look at all the  
22 flight logs, I have no idea, I flew  
23 frequently.

24 Q. Why don't you take a look at the  
25 next three pages and see if that refreshes

1 G Maxwell - Confidential

2 your recollection.

3 MR. PAGLIUCA: You are talking

4 about [REDACTED]

5 MS. McCAWLEY: She can pick any  
6 couple of pages, those have a lot of the  
7 individuals on them so that is a good  
8 sampling.

9 MR. PAGLIUCA: So pick any pages  
10 you want.

11 Q. Does that refresh your recollection  
12 at all as to whether GM represents you or  
13 some other individual?

14 A. Again, I can't testify whether that  
15 represents me or not, I don't see any other  
16 GMs but you have to understand that even if  
17 my name is on that record doesn't mean I was  
18 on the flight.

19 Q. So are you contesting the accuracy  
20 of the flight logs? In other words, you said  
21 it doesn't represent you are on the flight so  
22 is it your testimony just because a name is  
23 listed doesn't mean they were actually on the  
24 flight?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I can't testify to what -- these  
4 are records that were produced by Dave Rogers  
5 is on here, so these aren't federally  
6 mandated records, so I can't testify to what  
7 he produced.

8 Q. I would like you to turn to page,  
9 at the bottom, the Bates number is [REDACTED]  
10 And the month is [REDACTED].

11 A. Okay.

12 Q. If you go down to the number that  
13 is [REDACTED] that would be [REDACTED] you're  
14 going to see on that line an [REDACTED] which is a  
15 [REDACTED] and then you  
16 will see [REDACTED] which is going to be, I'm going  
17 to pronounce it incorrectly, [REDACTED]  
18 [REDACTED] I'm sure I'm not pronouncing that  
19 correctly. Then you will see in the list,  
20 you will see JE, GM, SK, President Clinton,  
21 Doug Band, it looks like --

22 A. I believe it says male.

23 Q. Yes. Then [REDACTED] I  
24 believe. Is that GM on this page  
25 representative of you?

1 G Maxwell - Confidential

2 A. Well, this would be a flight that I  
3 would potentially remember with Bill Clinton  
4 on it but I don't actually recall going to  
5 Russia.

6 Q. Are those your initials, do you  
7 recall being on the flight?

8 A. Those are my initials with  
9 President Clinton, I don't recall this flight  
10 either, but I would be more likely to if I  
11 had a bit more time to study the timing of  
12 this.

13 Q. Your testimony is you don't recall  
14 flying with President Clinton from [REDACTED] to  
15 [REDACTED]

16 A. I don't recall the [REDACTED] to [REDACTED]  
17 flight. I have definitely flown with  
18 President Clinton.

19 Q. On that same page you will see  
20 beneath there, beneath 22 you will see the  
21 indication, same as above, same as above,  
22 same as above in the column that originally  
23 had the initials.

24 A. Uh-huh.

25 Q. And the names.

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2 A. Uh-huh.

3 Q. Do you recall flying with President  
4 Clinton from [REDACTED] to [REDACTED]

5 [REDACTED]

6 A. I do.

7 Q. So the GM that would be represented  
8 in that column would be you?

9 A. I recall going to [REDACTED] with the  
10 president so that is likely to be me.

11 Q. You were on Jeffrey's plane for  
12 that trip?

13 A. I believe I was.

14 Q. Do you know who [REDACTED]  
15 is?

16 A. I do not.

17 Q. I'm going back towards the front  
18 which is going to be [REDACTED] please. And  
19 you're going to see --

20 A. Hang on I'm not --

21 Q. Take your time.

22 A. Okay.

23 Q. You are going to see in the date  
24 column, you will see [REDACTED] and then about  
25 halfway down you will see [REDACTED] and

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2 then you will see the [REDACTED] which  
3 is the column which is where I want you to  
4 start looking at the log and there you're  
5 going to see [REDACTED]

[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

11 A. Okay.

12 Q. If you look at the column, if you  
13 go back up to the top on the [REDACTED] if you look  
14 at the column you will see JE, GM, ET,  
15 Virginia Roberts and I believe it says [REDACTED]  
16 [REDACTED] sorry I'm not reading that very  
17 well.

18 Do you recall flying from, if you  
19 see the dates, the [REDACTED]  
20 [REDACTED] Do you recall a trip that went from  
21 the United States to [REDACTED] and to the places  
22 I just mentioned where Virginia Roberts was  
23 on the plane with you?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

1 G Maxwell - Confidential

2 A. I already testified that I don't  
3 recall Virginia on any of these flights.

4 Q. I would like to mark, as Maxwell 7,  
5 I will put it at the top?

6 (Maxwell Exhibit 7, photo, marked  
7 for identification.)

8 MR. PAGLIUCA: Has this document  
9 been produced in discovery?

10 MS. McCAWLEY: Yes.

11 MR. PAGLIUCA: Do you have a Bates  
12 number?

13 MS. McCAWLEY: This one doesn't.

14 Q. I'm going to ask you --

15 MR. PAGLIUCA: I don't recall  
16 seeing this document so I would like to  
17 see a Bates number document before we  
18 ask questions about it.

19 MS. McCAWLEY: Can you go look for  
20 it and I will continue. We will set  
21 that aside until we get a Bates number.  
22 You may want to leave that log up and  
23 set it to the side and we will bounce  
24 back to that.

25 Q. Do you recall -- I think earlier

1 G Maxwell - Confidential

2 you said you visited Jeffrey's island, I  
3 think they called it St. Jeffrey or St.  
4 James, the U.S. Virgin Island home.

5 A. St. James.

6 Q. Do you recall whether President  
7 Clinton was ever on that island?

8 A. Categorically, definitively,  
9 absolutely, without a shadow of a doubt, when  
10 I was present or any other time that I am  
11 aware of, was President Clinton ever on that  
12 island, I do not believe he went to that  
13 island ever ever, that is an absolute  
14 fabrication and an absolute flat out lie.

15 Q. Was President Clinton or former  
16 President Clinton ever at any of Jeffrey  
17 Epstein's homes when you present, other than  
18 the island I know you said that did not  
19 happen, the home in either New York or Palm  
20 Beach or New Mexico?

21 A. I do not believe at any time  
22 President Clinton was at any of Jeffrey's  
23 homes, I have absolutely no knowledge or  
24 otherwise that he was ever there.

25 Q. You don't recall having dinner with



1 G Maxwell - Confidential

2 him at any of those homes?

3 A. Again, Virginia is absolutely  
4 totally lying. This is a subject of  
5 defamation about Virginia and the lies she  
6 has told and one of lies she told was that  
7 President Clinton was on the island where I  
8 was present. Absolutely 1000 percent that is  
9 a flat out total fabrication and lie.

10 Q. You did fly on planes, Jeffrey  
11 Epstein's planes with President Clinton, is  
12 that correct?

13 A. I have flown, yes.

14 Q. Would it be fair to say that  
15 President Clinton and Jeffrey are friends?

16 A. I wouldn't be able to characterize  
17 it like that, no.

18 Q. Are they acquaintances?

19 A. I wouldn't categorize it.

20 Q. He just allowed him to use his  
21 plane?

22 A. I couldn't categorize Jeffrey's  
23 relationship.

24 Q. When you were on the plane with  
25 Jeffrey and President Clinton, did you

1 G Maxwell - Confidential  
2 observe Jeffrey and President Clinton  
3 talking?

4 A. I'm sure they did.

5 Q. Did they seem friendly?

6 A. I don't recollect.

7 Q. Was Epstein one of the original  
8 people that conceived the Clinton global  
9 initiative?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 Q. Do you know?

13 A. I don't have -- I don't know what  
14 you are talking about.

15 Q. You don't know what I'm talking  
16 about.

17 Did you ever, not at one of houses,  
18 but did you ever eat dinner with President  
19 Clinton and Jeffrey Epstein?

20 A. Are you just talking in general  
21 anywhere.

22 Q. In general?

23 A. I believe on a plane of this nature  
24 we would have had a meal.

25 Q. But not outside of the travel on

1 G Maxwell - Confidential

2 the flights?

3 A. I can't recollect having a meal  
4 with them, but just so we are clear, the  
5 allegations that Clinton had a meal on  
6 Jeffrey's island is 100 percent false.

7 Q. But he may have had a meal on  
8 Jeffrey's plane?

9 A. I'm sure he had a meal on Jeffrey's  
10 plane.

11 Q. You do know how many times he flew  
12 on Jeffrey's plane?

13 A. I don't.

14 Q. Do you know who Doug Band is?

15 A. I do.

16 Q. How do you know him?

17 A. He used to work or still works for  
18 Bill Clinton.

19 Q. Did you ever have a relationship  
20 with him?

21 A. We are talking about adult  
22 consensual relationships, it's off the  
23 record.

24 Q. I'm not asking what you did with  
25 him, I'm asking if you ever had a

1 G Maxwell - Confidential

2 relationship with him?

3 MR. PAGLIUCA: If you understand  
4 the term relationship, certainly you can  
5 answer that.

6 A. Define relationship.

7 Q. Somebody that you would have spent  
8 time together, either seeing them in a  
9 romantic relationship or --

10 A. You need to be, what do you mean by  
11 romantic. I was friends with Doug but you  
12 are suggesting something more so I want to be  
13 clear what you are actually asking me.

14 Q. You defined it. You said you were  
15 friends with him. If that's what you were  
16 that's all I need to know.

17 While you were on the trip with  
18 President Clinton, do you recall where you  
19 stayed at these locations, in other words,  
20 would you leave the jet and stay overnight at  
21 a hotel, do you have a recollection of this  
22 trip?

23 A. I recollect the trip but if you're  
24 asking me where we stayed, you can see it's a  
25 very fast paced trip. It was very tiring and

1 G Maxwell - Confidential

2 I don't recollect where we stayed.

3 Q. Do you recollect if you stayed at  
4 the same place President Clinton stayed? In  
5 other words, if you left the plane to go a  
6 hotel did you all go together is your  
7 recollection?

8 A. I honestly don't recollect, no.

9 Q. Part of this trip we were just  
10 talking about, there is a flight that goes to  
11 Thailand, do you remember being in Thailand?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. Are you asking me --

15 Q. On the President Clinton trip.

16 A. Are you referencing something?

17 Q. The part that, let me make sure  
18 I've got it here. The entry that would be  
19 the Thailand, would be the one -- let me make  
20 sure I'm correct. I have you on the wrong  
21 page, it's actually the page before. It's  
22 going to be [REDACTED] And it's going to be the  
23 entry on [REDACTED] starting on [REDACTED] and then  
24 it goes down to where it has the same as  
25 above, to [REDACTED] -- I'm saying

1 G Maxwell - Confidential

2 [REDACTED]

3 MR. PAGLIUCA: That's what the  
4 document says.

5 Q. I'm not representing the date but  
6 there it is. So the last leg of that where  
7 it says same as above has, the second to  
8 last, I'm sorry on the [REDACTED]

9 [REDACTED]

10 Do you remember being in Thailand  
11 with President Clinton?

12 A. I do.

13 Q. Do you remember what the purpose of  
14 that trip was?

15 A. I don't.

16 Q. Do you know whether -- do you  
17 recall, did you stay the night in Thailand?

18 A. I don't recall.

19 Q. Do you recall why you went to  
20 Thailand?

21 A. I don't recall.

22 Q. Who is Andrea Mitrovich?

23 A. She I believe was a stewardess on  
24 this flight.

25 Q. Did she perform any massages on the

1 G Maxwell - Confidential

2 flight?

3 A. I don't recollect any messages on  
4 the flight.

5 Q. Do you know who [REDACTED] is?

6 A. It doesn't -- no I don't know who  
7 that is, I can't recall.

8 Q. This is not in color, it's a black  
9 and white but it has the Bates label on it.  
10 Should I take the sticker off the one that  
11 has -- I don't know if you want to swap it.

12 MR. PAGLIUCA: Let the record  
13 reflect I am replacing this on the black  
14 and white copy of this exhibit with

15 [REDACTED]

16 Q. So, we were talking earlier, we  
17 were looking at the flight logs and we were  
18 talking about a trip and let me just get you  
19 back to the page. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 G Maxwell - Confidential

2 Q. Can I direct your attention to the  
3 picture, please.

4 A. Of course.

5 Q. Can you tell me who is in this  
6 picture, who is pictured here, and for the  
7 court reporter's benefit, can you go from the  
8 left of the picture to the right of the  
9 picture, to the extent you can identify the  
10 individuals?

11 A. Sure. I cannot identify the person  
12 on the left, I cannot identify the person  
13 next left. I can identify Jeffrey Epstein.  
14 I cannot identify the next person to his  
15 right and the next person in the picture is  
16 myself.

17 Q. Is the individual all the way to  
18 the left at the beginning of the picture,  
19 does that resemble Emmy Taylor. You might  
20 want to look at the color version if that  
21 helps you at all, I know it's not the marked  
22 one. I don't if that's easier to see, they  
23 are both dark.

24 A. That does not look like Emmy Taylor  
25 at all.



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2 Q. Do you recall --

3 MR. PAGLIUCA: Let's mark this then  
4 as deposition Exhibit 8 since we are  
5 referring to it and then you can give us  
6 copies as well.

7 MS. MENNINGER: It's different  
8 because it has other people in this  
9 color photo.

10 (Maxwell Exhibit 8, photo, marked  
11 for identification.)

12 Q. Do you recall who took this  
13 photograph?

14 A. I do not.

15 Q. Do you recall this photograph being  
16 taken by Virginia?

17 A. First of all, I don't know where we  
18 are.

19 Q. So you don't recognize the  
20 building?

21 A. I don't recognize the building and  
22 I don't recognize -- the only two people I  
23 recognize in the picture are Jeffrey and  
24 myself.

25 Q. Does this like look a picture of a

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2 building that you would have seen when you  
3 were on the trip in Europe?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I can't possibly answer that.

7 Q. Do you recall Virginia ever taking  
8 pictures?

9 A. I barely recall Virginia, period.

10 Q. Do you recall her ever taking  
11 pictures?

12 A. No, I don't.

13 Q. I'm going to direct your attention,  
14 still within the flight logs to -- starting  
15 on the next page from where you just were  
16 which is going to be [REDACTED] And the date at  
17 the top says [REDACTED] you will see [REDACTED] and I'm  
18 directing your attention down towards the  
19 middle to the bottom where you will see the  
20 numbers [REDACTED]

21 A. Uh-huh.

22 Q. And we've got actually I'm going to  
23 direct your attention to the one that starts

24 [REDACTED]

[REDACTED]

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2 and in the line, the remarks line you will  
3 see JE, GM, AP, VR, BK, Marvin Minski and

4 [REDACTED]

5 MR. PAGLIUCA: Are you reading the  
6 29th, is that what you're reading?

7 MS. McCAWLEY: I'm reading the  
8 29th, yes.

9 Q. Below that you will see JE, GM, AP,  
10 VR, [REDACTED] and Marvin  
11 Minski.

12 Do you see that?

13 A. I do.

14 Q. Do you recall a trip from Teterboro  
15 to Santa Fe and Santa Fe back to Palm Beach  
16 with these individuals?

17 A. I don't.

18 Q. Do you recall being on a plane with  
19 [REDACTED] and Virginia Roberts?

20 A. I don't.

21 Q. Do you recall ever witnessing any  
22 sexual interaction on one of Jeffrey's planes  
23 with any of these individuals?

24 A. I do not, absolutely not.

25 Q. Did Jeffrey have a fold out bed on

1 G Maxwell - Confidential

2 one of his planes?

3 A. There was a bed on one of his  
4 planes that folded out, yes.

5 Q. Do you recall whether with respect  
6 to this being in Santa Fe, do you recall  
7 whether you were there for some form of a  
8 party?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I don't recall the trip at all and  
12 this looks like a total work trip, not a  
13 party trip.

14 Q. What would be the difference  
15 between a work trip and a party trip?

16 A. Just that I would be on trips for  
17 work and I believe that this looks like, AP  
18 looks like it's one of the -- probably one of  
19 the designers and the time would meet with a  
20 trip to decorate the house, just the timing  
21 of it.

22 Q. So would Virginia be brought on  
23 trips that were for the purpose of work and  
24 decorating the house?

25 A. Like I said, I never worked with

1 G Maxwell - Confidential

2 her but you would have to ask Jeffrey what he  
3 brought her on the trip for.

4 Q. But she would travel with him when  
5 there was a work trip like this?

6 A. I can't -- I'm seeing that she is  
7 on this flight but I have no idea what she is  
8 doing, he invited her, it would not be my  
9 job.

10 Q. What about [REDACTED], would she  
11 regularly travel with Jeffrey on flights?

12 A. I have no idea, you would have to  
13 look through the flight logs. I have no  
14 idea.

15 Q. Your recollection is -- what is  
16 your recollection, do you recollect [REDACTED]  
17 traveling often on flights with Jeffrey?

18 A. Absolutely not. No, not at all. I  
19 don't recollect her actually on the flight at  
20 all.

21 Q. I think you can set that aside for  
22 the moment.

23 (Maxwell Exhibit 9, message pad  
24 pages, marked for identification.)

25 Q. We will mark as Exhibit 9 these

1 G Maxwell - Confidential

2 excerpts from -- we will identify what they  
3 are but from the message pads.

4 Did you want to correct anything?

5 A. I want to make an addendum.

6 Would you mind rereading the last  
7 question back to me?

8 (Record read.)

9 A. I also just want to say that at  
10 this point I cannot recollect flying to  
11 parties. Jeffrey went for work so -- was  
12 this in Santa Fe, this flight as well.

13 Q. The flight we were looking at, yes  
14 but it was to Santa Fe --

15 A. I don't recall going to any parties  
16 in Santa Fe at any time but certainly flying  
17 to Santa Fe for a party seems highly  
18 improbable.

19 Q. So I'm going to direct your  
20 attention to the document that I set before  
21 you which is Bates number [REDACTED] and it  
22 has different Bates numbers because it's a  
23 smaller version of the larger production.  
24 These are the pages I will be asking about.

25 In the time that you were working

1                   G Maxwell - Confidential  
2       with Jeffrey in Palm Beach, do you recall a  
3       process for taking, anybody at the house  
4       taking messages when incoming phone calls  
5       came in?

6           A.     You are supposed to take a message  
7       and receive the message and write the message  
8       down. Who was the message was for, what time  
9       it was taken and who took it and what the  
10      message was, obviously.

11          Q.     Does what's in front of you look  
12      familiar with respect to the message pads  
13      that you would have used at the house?

14          A.     It is familiar.

15          Q.     I'm going to direct your attention  
16      to the second page of it?

17                 MR. PAGLIUCA:  These all have SAO  
18      numbers on them or Bates ranges and I  
19      don't see any of your Bates ranges on  
20      these.  I know you have produced message  
21      pads but those have your Bates range  
22      numbers on them and I'm wondering if  
23      these are different documents.

24                 MS. McCAWLEY:  It's the same, just  
25      ours have the Bates underneath them.

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2 These were produced as part of the rule  
3 26 discovery. We can get the additional  
4 Bates if you want.

5 Q. The one I'm asking about first is  
6 the [REDACTED]. You can look at that and then  
7 I will identify the Bates number referenced  
8 in this case.

9 I want to direct your attention to  
10 the top right-hand corner just so I have an  
11 understanding of how these messages were  
12 taken. So I see that it says at the top it  
13 says in the for line it says Ms. Maxwell and  
14 the date of 4/25/04 and then I see under the  
15 M line it looks like Necole Hesse or  
16 something like that, a phone number and a  
17 message saying returning your call and on the  
18 bottom it looks like Rushi.

19 Explain to me, is this -- does this  
20 represent [REDACTED] taking down a message for you  
21 from Ms. Hesse, is that how these work?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation. Go ahead.

24 Q. My question is, I'm trying to  
25 understand how the messages were taken.



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2 Looking at this message pad, where it says  
3 signed [REDACTED] can you tell me who [REDACTED] was?

4 A. I cannot.

5 Q. You do not know.

6 Typically when these messages were  
7 taken in your practice when you were there,  
8 would the individual who took the message  
9 write their name on the message?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. I don't recollect, you can ask who  
13 wrote it so you can find out who it was.

14 Q. Do you know who Necole Hesse is?

15 A. I don't.

16 Q. I'm going to direct your  
17 attention -- do we have a Bates number for  
18 that?

19 MR. EDWARDS: [REDACTED]

20 Q. Giuffre [REDACTED] for that one.

21 I will direct your attention to the  
22 first page which has the [REDACTED] on it.

23 A. Okay.

24 Q. Now at the top of that document, on  
25 the right-hand side, the message that reads

1 G Maxwell - Confidential  
2 for JE, date 1/02/03, message Caroline Casey  
3 and then it's signed GM.

4 Is that your signature?

5 A. That's not my handwriting.

6 Q. Would other people take a message,  
7 how did this process work, is there someone  
8 else in the house with the initials GM?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I cannot answer that. It's not my  
12 handwriting.

13 Q. I'm trying to understand how this  
14 gets there. If you took a message and didn't  
15 write it down, would someone else record that  
16 message for you?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. All I can tell you, this is not my  
20 handwriting so I cannot -- I have no idea  
21 what that is.

22 Q. Was the practice that, what was the  
23 practice when someone answered the phone with  
24 these message pads, what were they supposed  
25 to do?

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2 A. They were supposed to take a  
3 message and the time and date and give the  
4 message.

5 Q. Were they supposed to indicate who  
6 took the message?

7 A. They were but it wasn't -- I don't  
8 really recall the actual process. I can see  
9 from here it looks like you were supposed to  
10 but that's not my handwriting so I can't say  
11 what that was.

12 Q. Do you know who Caroline Casey is?

13 A. No, I don't.

14 Q. Do you know whether Caroline Casey  
15 was under the age of 18?

16 A. I just testified I couldn't  
17 remember who she was so it would be difficult  
18 to know how old she was.

19 Q. Do you know if she was coming to  
20 the house to provide massages?

21 A. I don't remember who she is at all,  
22 so no.

23 Q. And then I would like to direct  
24 your attention to the message right  
25 underneath it. Which says JE, [REDACTED], Amanda

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2 and has a phone number and the message says,  
3 wants to know if she should bring her friend  
4 [REDACTED] tonight.

5 What is that message referring to?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. I can't possibly know.

9 Q. Did individuals at the house take  
10 messages for underage girls to come over and  
11 bring friends for the purpose of providing  
12 massages?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. How would I possibly know what you  
16 are talking about.

17 Q. Did you record messages at the  
18 house?

19 A. It's not my job.

20 Q. You did from time to time record  
21 messages?

22 A. Hardly ever.

23 Q. But you did from time to time do  
24 it?

25 A. I'm just saying I hardly ever took

1 G Maxwell - Confidential  
2 messages, very, very, very, very  
3 infrequently.

4 Q. Do you know if Amanda brought her  
5 friend [REDACTED] over on that night?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. One, I don't know what this message  
9 is, I don't know if I was in Palm Beach, I  
10 don't know who Amanda is, I don't know who  
11 [REDACTED] is and I don't know what this message  
12 is referring to.

13 Q. So on January 2nd of 2003, were you  
14 in Palm Beach?

15 A. I don't know.

16 Q. Where would you have been other  
17 than Palm Beach at the time?

18 A. I could have been anywhere.

19 Q. Where did you typically live?

20 A. What are you asking me?

21 Q. So for example, in 2003, where was  
22 your primary residence, was it wherever  
23 Jeffrey was living and staying or was it  
24 independent of that?

25 A. What was the date again.

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2 Q. In 2003?

3 A. The end of 2003?

4 Q. January, the beginning.

5 A. I don't know, I could have been  
6 anywhere, Jeffrey and I were leading almost  
7 separate lives by then.

8 Q. If you were at the house that day,  
9 did you recall seeing anybody by the name of

10

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I don't know if I was at the house,  
14 so I can't testify to that.

15 Q. Let's flip back to the next page,  
16 the one we were on before the [REDACTED], the  
17 message towards the bottom that says, for  
18 Jeffrey, message of Ghislaine. And it says,  
19 Would it be helpful to have and then redacted  
20 come to Palm Beach today to stay here and  
21 help train new staff with Ghislaine. Who  
22 were you referring to in that message; do you  
23 remember?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 Q. The question is, do you recall this  
3 message?

4 A. I do not recall this message.

5 Q. Do you recall training a female  
6 under the age of 18 at Jeffrey's home?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I never trained a female under the  
10 age of 18 at Jeffrey's home.

11 Q. Did you ever say it would be  
12 helpful to have a female under the age of 18  
13 come to Palm Beach today to stay here and  
14 help train new staff with Ghislaine?

15 A. I never asked anyone under the age  
16 of 18 come to help train new staff.

17 Q. I'm going to flip to the next page  
18 which is [REDACTED].

19 A. By the way, that is not my  
20 handwriting and it's not dated and I couldn't  
21 possibly tell you who that is.

22 Did you hear that?

23 Q. You got your testimony on the  
24 record.

25 [REDACTED]

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2 A. Yes.

3 MR. EDWARDS: Giuffre [REDACTED]

4 Q. I'm going to direct your attention  
5 to the top right-hand corner, for Mr.  
6 Epstein, [REDACTED], message [REDACTED] a phone  
7 number and called.

8 Do you know who [REDACTED] is?

9 A. I don't.

10 Q. Do you know that [REDACTED] was 15 at  
11 the time she left this message?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. I don't know who [REDACTED] is.

15 Q. And then I'm going to direct your  
16 attention to the bottom left which is a  
17 message JE message of Jean Luc and the  
18 message says, He just did a good one, 18  
19 years, she spoke to me and said I love  
20 Jeffrey.

21 Was Jean Luc referring to sex with  
22 an 18 year old in that message?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. How could I know what Jean Luc is



1 G Maxwell - Confidential

2 referring to.

3 Q. Do you know if Jean Luc had sex  
4 with an 18 year old that he referenced to  
5 Jeffrey Epstein?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. How could I possibly know.

9 Q. Did Jeffrey Epstein or Jean Luc  
10 ever tell you that Jean Luc had sex with an  
11 18 year old?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. I have no idea what you are talking  
15 about.

16 Q. Did they ever tell you that?

17 A. I have no recollection of ever  
18 hearing such a ridiculous thing.

19 Q. I will turn to the next page which  
20 is SAO 2841?

21 MS. MENNINGER: Do you have the  
22 Bates number?

23 Q. The bottom right-hand corner, Mr.  
24 Epstein, the date [REDACTED] Ms. Maxwell, it  
25 says, [REDACTED] it says, quote, [REDACTED] is

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2 available on Tuesday, no one for tomorrow.

3 Is this a message you took?

4 A. It's not my handwriting and I don't  
5 know who R is.

6 Q. So when it says Ms. Maxwell in the  
7 line there, is that you calling for Mr.  
8 Epstein?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I didn't write it, I don't know  
12 when this message was taken. I don't even  
13 know what it's referring to and I don't know  
14 what my name is doing on that message pad.

15 Q. I know you said you only took them  
16 a few times. Do you have a recollection of  
17 taking messages of females who would call the  
18 house to indicate whether or not they were  
19 coming over?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. Give me a date range.

23 Q. On 7/9/04.

24 A. How would I know if I'm in Palm  
25 Beach, most likely not.

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2 Q. I'm asking if you have a  
3 recollection of taking messages for girls who  
4 would call the house --

5 A. Girls.

6 Q. Females, who would call the  
7 house --

8 A. Over the age of 18.

9 Q. [REDACTED] is 15.

10 A. I don't know who [REDACTED] is, so I  
11 can't testify anything to [REDACTED]

12 Q. Your name is on the message.

13 A. I didn't put it there and I don't  
14 know what it's doing there.

15 Q. So your testimony is you didn't  
16 take this message?

17 A. I obviously didn't take the  
18 message, it's signed by somebody R, it's not  
19 my handwriting. We don't know if I'm in Palm  
20 Beach.

21 Q. Did you arrange for [REDACTED] to have  
22 his friend [REDACTED] come over on Tuesday of  
23 this week?

24 A. I don't know who [REDACTED] is so it  
25 would be hard for me to arrange anything with

1 G Maxwell - Confidential

2 someone I don't know.

3 Q. Why is your name reflected on this  
4 message pad?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. I have no idea. You would have to  
8 ask whoever took the message.

9 Q. Did you, in the course of your  
10 work, regularly take messages for Jeffrey  
11 Epstein?

12 A. I already testified I hardly ever  
13 did.

14 Q. Would you, in the course of your  
15 work, regularly set up appointments for  
16 females to come over and give massages for  
17 Jeffrey Epstein?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. Can you specify, females, you mean  
21 adults over the age of 18.

22 Q. Did you regularly set up for  
23 Jeffery adults over the age of 18 to come for  
24 massages?

25 A. I didn't regularly do that, no.

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2 Q. Would you take messages with  
3 respect to females over the age of 18 to come  
4 over for a massage?

5 A. I already testified I hardly ever  
6 did take messages.

7 Q. But would you?

8 A. I already testified, I hardly  
9 ever --

10 Q. I know hardly ever, but did you?

11 A. Over the course of time it is  
12 possible I may have taken a couple, I have no  
13 recollection. I hardly ever did and I did so  
14 irregularly that it would hard for me to  
15 pinpoint.

16 Q. Did you ever take a message for a  
17 female under the age of 18 to come over for a  
18 massage or for any other reason to be with  
19 Jeffrey Epstein?

20 MR. PAGLIUCA: Object to the form  
21 and foundation.

22 A. I hardly ever took a message. I  
23 have absolutely no way of knowing, maybe one  
24 of my friends' daughters called to say they  
25 were coming to visit me. I have never taken

1           G Maxwell - Confidential  
2       messages, I don't know about how I would  
3       possibly know if somebody I spoke to, one or  
4       two times I took a message is, how old they  
5       would be but I have never taken a message  
6       where I was aware of anything being under the  
7       age of 18 and I probably took it so  
8       infrequently, it would be impossible.

9           Q.     Can you turn to [REDACTED] it  
10       should be the next page.

11          A.     Uh-huh.

12          Q.     Do you see at the top, it says, for  
13       Mr. J. 11/8/04 and then the name is  
14       redacted. It says, I have a female for him.

15                 Why would a minor be calling  
16       Jeffrey to say they have a female for him?

17                 Do you know?

18                 MR. PAGLIUCA: Objection to the  
19       form and foundation.

20          A.     First of all, I don't know that's a  
21       minor, I don't know who took the message.

22          Q.     I will represent to you these are  
23       police reports and minor's names have to be  
24       redacted for privacy purposes?

25                 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 Q. Do you know why a minor child would  
4 be calling Jeffrey and leaving a message to  
5 say, quote, I have a female for him?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. I can't testify anything about this  
9 message, I don't know anything about it.

10 Q. I'm going to direct your attention  
11 to the next page [REDACTED] If you look at  
12 the bottom left, you are going to see a  
13 message for Jeffrey, from [REDACTED], it  
14 says she doesn't have a number and left a  
15 message that she called.

16 Do you know who [REDACTED] is?

17 A. I do not.

18 Q. Do you know that [REDACTED] was  
19 13 at the time she placed this call to  
20 Jeffrey?

21 A. I don't know who [REDACTED] is.

22 Q. Would Jeffrey regularly have 13  
23 year olds call and leave messages?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. How would I possibly, these were  
3 messages taken when I was not at the house  
4 and I have no idea who they are nor how old  
5 they are nor anything.

6 Q. How do you know you weren't at the  
7 house on this day?

8 A. I was hardly at the house in 2005.

9 Q. So you could have been there, you  
10 just don't know?

11 A. In the five days I might have been  
12 there in 2005, I suppose it's possible but  
13 it's unlikely.

14 MR. PAGLIUCA: Do you know why this  
15 isn't redacted if you are representing  
16 all the names of people who are underage  
17 have been redacted from these records.

18 MS. McCAWLEY: I think it was -- my  
19 assumption is it was a miss by the  
20 police department.

21 Q. I will direct your attention to [REDACTED]  
22 [REDACTED] so you will skip a page and go back,  
23 it's the final page in the message pads and  
24 you will see on the top left for Jeffrey, on  
25 6/1/2005 from Jean Luc Brunel with a phone



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2 number. It says, quote, He has a teacher for  
3 you to teach you how to speak Russian. She  
4 is two times eight years old. Not blond.  
5 Lessons are free and you can have your first  
6 today if you call.

7 Do you know whether Jean Luc Brunel  
8 sent a Russian girl that was 16 years old  
9 over to Jeffrey Epstein's home?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. I do not know.

13 Q. Did you ever observe a Russian girl  
14 that was 16 years old come to Jeffrey  
15 Epstein's home?

16 A. I am not aware of any 16 year old  
17 Russian girl that I can recall in Jeffrey  
18 Epstein's home.

19 Q. Do you know whether Jeffrey Epstein  
20 had sex with a 16 year old Russian girl?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. I do not know.

24 THE VIDEOGRAPHER: It's 12:25.

25 This will be the end of disk 3, we are

1 G Maxwell - Confidential

2 off the record.

3 (Recess.)

4 A F T E R N O O N S E S S I O N

5 (Time noted: 1:21 p.m.)

6 G H I S L A I N E M A X W E L L,

7 resumed and testified as follows:

8 EXAMINATION BY (Cont'd.)

9 MS. McCAWLEY:

10 THE VIDEOGRAPHER: It's now 1:21,  
11 we're starting disk No. 4. We are back  
12 on the record.

13 Q. Ms. Maxwell, before the break, we  
14 were talking about and I think it's one of  
15 the exhibits that's marked in front of you,  
16 I'm not sure of the number, but the police  
17 report that I showed you earlier today.

18 Now that you have knowledge of the  
19 police report and the criminal investigation  
20 with respect to Jeffrey Epstein, do you  
21 believe that Jeffrey Epstein abused any minor  
22 children?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. Can you repeat the question please

1 G Maxwell - Confidential

2 and break it down so it's more  
3 understandable.

4 Q. Now that you have the police report  
5 that I showed you this morning that you had  
6 an opportunity to look at.

7 A. You gave it to me, I did not look  
8 at it.

9 Q. The questions that I asked you  
10 about the police report -- you are aware  
11 there is a police report?

12 A. I am aware there is a police  
13 report.

14 Q. You are aware there was a criminal  
15 investigation of Jeffrey Epstein?

16 A. I am aware that there was that.

17 Q. Now that you are aware of those two  
18 things and having talked to Jeffrey Epstein,  
19 do you believe Jeffrey Epstein sexually  
20 abused minors?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. Can you reask the second part of  
24 that question please.

25 Q. Sure. The two documents we were

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2 talking about, the document and the  
3 investigation, you said you are aware of and  
4 after having talked to Jeffrey Epstein, do  
5 you believe Jeffrey Epstein sexually abused  
6 minors?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. What do you mean I talked to  
10 Jeffrey, you need to break the question down  
11 further.

12 Q. So you have the police report.

13 A. I do.

14 Q. And you are aware of the criminal  
15 investigation?

16 A. I am.

17 Q. Let's take those two things. After  
18 knowing those two things, do you believe that  
19 Jeffrey Epstein abused minor children?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. Can you explain what you mean by  
23 the question actually.

24 Q. I think the question speaks for  
25 itself. I will try again. I will say it one

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2 more time because I want you to be able to  
3 understand it.

4 Knowing that you have the police  
5 report here and knowing about the criminal  
6 investigation, do you believe that Jeffrey  
7 Epstein sexually abused minors?

8 MR. PAGLIUCA: Same objection.

9 A. I know what you put in front of me  
10 and I know what I read.

11 Q. I'm asking what you believe, do you  
12 believe Jeffrey Epstein sexually abused  
13 minors?

14 A. I can only tell you what I read and  
15 what you showed me.

16 Q. I'm asking what you believe, from  
17 your own belief, do you believe that Jeffrey  
18 Epstein abused minors?

19 A. I can only go from what I know  
20 personally and what I know personally about  
21 what Virginia's lies talked about. She is  
22 the only person I know that actually claimed  
23 that. And I can say with certitude that  
24 everything Virginia said was a lie.

25 Q. You are aware Jeffrey Epstein was

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2 sentenced for sexual abuse, are you aware of  
3 that?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 Q. Are you aware that Jeffrey Epstein  
7 served time for sexual abuse of a minor?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. I don't believe that's what he was  
11 sentenced for, actually.

12 Q. So you don't know that Jeffrey  
13 Epstein served time for sexually abusing a  
14 minor?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. I don't believe that's what he was  
18 sentenced for.

19 Q. Do you know that Jeffrey Epstein  
20 was convicted for procuring a minor for  
21 prostitution?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. I don't know exactly what he was  
25 convicted of. I don't know that he was

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2 convicted. I know he spent time in jail.

3 Q. Do you know that he spent time in  
4 jail related to an issue with a minor child?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. I did not know that.

8 Q. What did you think he was spending  
9 time in jail for?

10 A. I only know he went to jail for --  
11 it was alleged that he hired -- had an  
12 underage prostitute.

13 Q. So knowing that, do you believe  
14 that Jeffrey Epstein sexually abused minors?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. I can only tell you what he went to  
18 jail for.

19 Q. I'm asking what you believe. I'm  
20 not asking what he went to jail for. I'm  
21 asking for your belief.

22 A. I cannot testify to what I believe.  
23 I can only say what I have seen in the  
24 reports and I know he went to jail.

25 Q. You can testify to what you

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2 believe. Do you believe --

3 A. I can only testify --

4 Q. Let me finish the question so the  
5 record is clear.

6 Do you believe Jeffrey Epstein  
7 sexually abused minors?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 Q. You can answer.

11 A. I can only testify to what I know.  
12 I know that Virginia is a liar and I know  
13 what she testified is a lie. So I can only  
14 testify to what I know to be a falsehood and  
15 half those falsehoods are enormous and so I  
16 can only categorically deny everything she  
17 has said and that is the only thing I can  
18 talk about because I have no knowledge of  
19 anything else.

20 Q. I'm not asking about Virginia. I'm  
21 asking whether you believe that Jeffrey  
22 Epstein sexually abused minors?

23 A. Again, I repeat, I can only go on  
24 what I know and what I know is a falsehood  
25 based on what Virginia said.



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2 Q. Do you believe Jeffrey Epstein  
3 sexually abused minors?

4 A. Again, I repeat, Virginia is a liar  
5 and based on Virginia's stories, that is  
6 what -- she lied and I can only then talk  
7 about what you've showed me in the police  
8 reports and I know he went to jail.

9 Q. Do you believe that Jeffrey Epstein  
10 sexually abused minors? I'm asking about  
11 your belief.

12 A. Again, I just repeat, I can only  
13 go -- my belief is Virginia is a liar.

14 Q. What is that belief?

15 A. She is an absolute liar and  
16 everything she said is a lie and therefore,  
17 everything that stems from that is a lie.

18 Q. So do you believe that Jeffrey  
19 Epstein sexually abused minors?

20 A. Again -- can we move on from here?

21 Q. No. You are going to answer the  
22 question.

23 A. I have already.

24 Q. No, you haven't.

25 A. I have.

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2 Q. Do you believe Jeffrey Epstein  
3 sexually abused minors?

4 A. Again, I repeat, the only person I  
5 know who has talked about these things that I  
6 have personal -- was personally present, was  
7 Virginia and I can only talk to Virginia and  
8 she is a liar.

9 Q. Setting aside Virginia. Take her  
10 out of the picture. It's my question.

11 A. We are here today because of  
12 Virginia and her lies because this is a  
13 defamation suit.

14 Q. Setting aside Virginia, do you  
15 believe Jeffrey Epstein sexually abused  
16 minors?

17 A. I cannot set aside Virginia because  
18 that's why we are here and this is the only  
19 reason I am sitting here in this room and I  
20 will not set her aside and I cannot comment  
21 about anything else except her because she is  
22 the only person I actually know about.

23 Q. Are you refusing to answer that  
24 question?

25 A. I am not refusing the question. I

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2 can only testify about Virginia who is an  
3 absolute total liar and you all know she is.  
4 She lied about her age, you know she lied  
5 about absolutely everything. So I can only  
6 go on what I know as a liar and she is a  
7 liar, an exaggerator, a fantasist and  
8 absolutely true terrible person.

9 Q. I want you to listen very  
10 carefully. I am asking you to set aside  
11 Virginia.

12 A. I can't set aside Virginia.

13 Q. I am asking you to do that for  
14 purposes of this question.

15 MR. PAGLIUCA: She doesn't have to.

16 MS. McCAWLEY: She can refuse to  
17 answer the question.

18 A. I'm not refusing to answer the  
19 question.

20 Q. You are refusing.

21 My question has nothing to do with  
22 Virginia. Let me make the record here. My  
23 question has nothing to do with Virginia. I  
24 want it to be clear for the court. My  
25 question has nothing to do with Virginia.

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2 What I'm asking you is whether you  
3 believe Jeffrey Epstein abused minors?

4 MR. PAGLIUCA: I object to the form  
5 and you made your record, she answered  
6 the question. A fair reading of her  
7 answer is she doesn't have a belief  
8 because she doesn't have any personal  
9 knowledge.

10 MS. McCAWLEY: Now you are  
11 testifying for the witness. Let her  
12 answer the question.

13 MR. PAGLIUCA: It's a fair answer  
14 to the question.

15 A. Again, I testified my only personal  
16 knowledge concerns Virginia and everything  
17 Virginia has said is an absolute lie, which  
18 is why we are here in this room. If you are  
19 asking me to testify about things I have no  
20 knowledge of other than the police report  
21 that you showed me, I am not in a position to  
22 make a statement based on that because you  
23 are asking me to speculate and I cannot  
24 speculate.

25 Q. I'm asking you about your belief.

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2 I'm not asking you to speculate at all. I'm  
3 asking what you believe.

4 A. You are asking me to speculate and  
5 I won't speculate.

6 Q. I'm not asking you to speculate.  
7 I'm asking what you believe.

8 MR. PAGLIUCA: She answered the  
9 question and we can move on.

10 MS. McCAWLEY: She hasn't answered  
11 the question.

12 MR. PAGLIUCA: We are not going to  
13 engage in this debate. She answered the  
14 question. If you want to mark it and  
15 move to compel an answer to the  
16 question, have at it. Okay.

17 Q. Ms. Maxwell, is it your belief that  
18 Jeffrey Epstein interacted sexually with  
19 minors?

20 A. Again, you are asking me the same  
21 type of question exactly but with different  
22 language. Again, my only knowledge of  
23 somebody who claims these things that I have  
24 personal knowledge of is Virginia. Virginia  
25 is an absolute liar and everything she has

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2       said is a lie. Therefore, based on those  
3       lies I cannot speculate on what anybody else  
4       did or didn't do because if Virginia is the  
5       example of what that story is and everything  
6       she said is false, so everything that leads  
7       from that is false.

8           Q.     So the 30 other minor children in  
9       the police report are also telling lies about  
10      being sexually abused during massages with  
11      Mr. Epstein?

12           MR. PAGLIUCA:  Objection to the  
13           form and foundation.  Counsel, can you  
14           show me in these police reports who the  
15           30 minors are?

16           MS. McCAWLEY:  I'm asking my  
17           question.

18           MR. PAGLIUCA:  You are making a  
19           representation about numbers, you are  
20           making a representation on the record  
21           about what people said or didn't say.  
22           We have no knowledge about that.  These  
23           are all redacted records so these are  
24           bad questions.  They don't lead to any  
25           admissible evidence.  It is only being

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2 propounded to the witness to harass her.

3 So we are done with these questions.

4 MS. McCAWLEY: Are you done?

5 MR. PAGLIUCA: Yes.

6 Q. My question is, are you aware that  
7 Jeffrey Epstein was convicted of having  
8 relations with a minor child?

9 MR. PAGLIUCA: She answered that  
10 question already.

11 MS. McCAWLEY: I'm getting to my  
12 next question.

13 MR. PAGLIUCA: Ask your next  
14 question. Don't keep asking the same  
15 question.

16 MS. McCAWLEY: You are now  
17 shouting, I want the record to reflect  
18 that you are interrupting the  
19 deposition. I ask you to calm down,  
20 take a deep breath and please let me ask  
21 my questions.

22 MR. PAGLIUCA: Your behavior is  
23 inappropriate.

24 Q. I will ask you again.

25 Do you believe that Jeffrey Epstein

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2 interacted sexually with minors?

3 A. Again, I go back to this, my only  
4 actual knowledge is with Virginia and  
5 Virginia is a liar, so I can only talk to  
6 what Virginia's story and as I said before  
7 and there are so many examples, I mean  
8 thousands of examples of her lies, that that  
9 is the only thing I can talk to.

10 Q. Based on that you do not believe  
11 that Jeffrey Epstein sexually abused minors?

12 A. Again, as I said, I'm only talking  
13 to what I know, I can only talk to Virginia.

14 Q. So is it your belief that Jeffrey  
15 Epstein did not sexually abuse minors?

16 A. Again, I can only talk to what I  
17 know and I know that Virginia is a liar and  
18 that what she said is a lie. So I can only  
19 testify to what she accused and you guys put  
20 in the press for salacious purposes and  
21 whatever terrible, inappropriate, unethical  
22 and terrible reasons you chose to do that  
23 about me and I can testify those are all  
24 lies.

25 Q. Do you know whether Jeffrey Epstein



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2 sexually abused any minor children?

3 A. Again, I only know 1000 percent  
4 that Virginia is a liar. I can only talk to  
5 Virginia, her lies and your inappropriate,  
6 unethical, really unattractive, terrible use  
7 of her and the way that you have abused the  
8 system, used the press for purposes that are  
9 unethical, inappropriate and appalling.

10 Q. Do you believe that Jeffrey Epstein  
11 used massages to lure minors to have sex with  
12 him?

13 A. Again, that is Virginia's  
14 testimony, which is a lie.

15 Q. But do you believe that?

16 A. Again, I refer back to Virginia.

17 Q. I'm asking whether you believe it  
18 or not?

19 A. I can only go with what I know and  
20 I know Virginia is a liar and therefore  
21 that's a lie.

22 Q. So you don't believe that?

23 A. I said, I only know that Virginia  
24 is lying.

25 Q. Are you aware that Jeffrey Epstein

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2 is a registered sex offender?

3 A. I am.

4 Q. Are you aware that Jeffrey Epstein  
5 paid considerable amounts of money to settle  
6 lawsuits with the minor children that he had  
7 sexual contact with?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. I have no knowledge of those  
11 issues.

12 Q. Why did you continue to maintain  
13 contact with Jeffrey Epstein after he pled  
14 guilty?

15 A. I'm a very loyal person and Jeffrey  
16 was very good to me when my father passed  
17 away and I believe that you need to be a good  
18 friend in people's hour of need and I felt  
19 that it was a very thoughtful, nice thing for  
20 me to do to help in very limited fashion  
21 which was helping if he had any issue with  
22 his homes, in terms of the staffing issues.  
23 It was very, very minor but I felt it was  
24 thoughtful in somebody's hour of need.

25 Q. Did he continue to pay you during

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2 that time period?

3 A. I was paid a little.

4 Q. You were paid?

5 A. Yes.

6 Q. When you say a little, what you did  
7 mean by that?

8 A. I don't recall exactly the amount.

9 Q. So in 2009 when you left him, what  
10 were you being paid?

11 A. I just told you, I don't recall.

12 Q. Were you being paid \$100,000?

13 A. I just don't you I don't recall.

14 Q. Were you paid over a million  
15 dollars?

16 A. I think I would remember over a  
17 million dollars.

18 Q. So it was under a million dollars?

19 A. It was under a million dollars.

20 Q. Was it over \$500,000?

21 A. I just told you, it was under 500,  
22 it was an amount of money less than \$500,000,  
23 less than a million dollars and I did it out  
24 of thoughtfulness and consideration for  
25 somebody who was in trouble.

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2 Q. Did you have an attorney to consult  
3 with during the criminal investigation of  
4 Jeffrey Epstein?

5 A. I don't believe I did.

6 Q. When did you learn that a search  
7 warrant was executed for the Palm Beach  
8 house?

9 A. I don't recall exactly.

10 Q. Were you present at the house in  
11 advance of the search warrant being executed?

12 MR. PAGLIUCA: Object to the form  
13 of the question.

14 A. I don't remember when the search  
15 warrant was executed and I don't remember the  
16 year that the search warrant was executed and  
17 whenever that was, I already testified, I was  
18 very, very infrequently at the house. So  
19 highly unlikely but I was there a couple of  
20 days, I just don't know which days it was in  
21 relation to the police situation.

22 Q. Did you have a computer at the Palm  
23 Beach home that was a computer that you would  
24 use?

25 A. No.

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2 Q. Was there a computer available for  
3 use in the Palm Beach house?

4 A. Can you be more specific.

5 Q. Was there anywhere in the Palm  
6 Beach house where there was a computer where  
7 you said you worked for him and there were  
8 other staff in the house, was there ever a  
9 computer in the Palm Beach mansion that was  
10 accessible by you or other staff?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I stopped being regularly at the  
14 house sometime in 2003 so from 2003 to when  
15 the police search was executed, I have no  
16 memory of what there was or what there was  
17 not. I can only testify for what was there  
18 when I was present largely.

19 Q. So in 2003 when you were still  
20 there, was there a computer that was  
21 accessible to you or other staff at the  
22 house?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. There was a desktop computer that

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2 people could use -- just like you would use  
3 if you needed to go online to get something,  
4 that people could use.

5 Q. Was that on a desk that you would  
6 use in your work capacity when you were at  
7 the house?

8 A. It was a desk, it was a room I was,  
9 I didn't really use that computer.

10 Q. Were there images of naked girls  
11 whether they be under the age of 18 or over  
12 the age of 18 on that computer?

13 A. I have no recollection of any naked  
14 people on that computer when I was there in  
15 2003, we are talking.

16 Q. What about from say '99 to 2003?

17 A. No, I can't recollect any naked  
18 pictures.

19 Q. Why were the computers removed from  
20 the house before the search warrant was  
21 executed?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. I have no knowledge of anything  
25 like that.

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2 Q. Do you know where the computers are  
3 now?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I don't know what computers you are  
7 talking of and I have no idea what you are  
8 referencing.

9 Q. In 2003 you said there was a  
10 computer in a room on a desk?

11 A. Right.

12 Q. Do you know where that computer is  
13 now?

14 A. I do not.

15 Q. Did you take pictures of nude  
16 females in any of Epstein's homes or in and  
17 around the homes, out by the pool or anywhere  
18 like, in the Palm Beach home, the New York  
19 home, USVI home or the New Mexico home?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. Can you repeat the question.

23 Q. Did you take pictures of nude woman  
24 over 18 or under 18, females, in any of  
25 Jeffrey Epstein's homes, inside or outside in

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2 or around the home?

3 A. I think we need to distinguish  
4 between anyone under the age of 18 and over  
5 the age of 18.

6 Q. We will start with, did you take  
7 pictures of nude females in or around any of  
8 Jeffrey's homes of women or females that were  
9 under the age of 18?

10 A. No.

11 Q. Did you take pictures of nude  
12 females --

13 A. Nude you mean with no clothing on.

14 Q. Or half nude, with no top on, any  
15 sort of nakedness to an individual.

16 In any of Jeffrey's homes, either  
17 Palm Beach, New Mexico, USVI or New York  
18 either outside by the pool, anywhere in or  
19 around those homes of females over the age of  
20 18?

21 A. So it is possible that I took  
22 pictures of people that were somehow semi or  
23 had some clothing on or no clothes on but at  
24 no time were any of these pictures remotely  
25 inappropriate. They were, you could see them



1                   G Maxwell - Confidential  
2       in a mainstream magazine today, there would  
3       be no inappropriateness, they would be  
4       covered, concealed, you wouldn't see anything  
5       at all.

6                   The types of -- first, I took very  
7       few and they were always by request, this was  
8       a picture you could put on your -- gift to  
9       your parent or to your grandparents to put on  
10      their mantel piece . It would be a very  
11      benign sort of attractive picture where you  
12      wouldn't see anything.

13                Q.     Who would request those pictures?

14                A.     From time to time, people, men and  
15      women would ask to have nice photographs of  
16      them taken.

17                Q.     And did Jeffrey Epstein request  
18      those pictures?

19                A.     I don't ever recall him asking me  
20      to take pictures.

21                Q.     Did you give him pictures of naked  
22      females as a present?

23                A.     I don't recall ever giving a  
24      present of -- I don't know why a photograph  
25      would constitute a gift.

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2 Q. Not as a gift.

3 Do you recall ever giving Jeffrey  
4 Epstein pictures that you've taken of these  
5 individuals in a naked state?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. First of all, we've already  
9 established that they are not naked state  
10 photographs.

11 Q. A piece of them being naked as you  
12 described.

13 A. I said they would be attractive as  
14 you would see in mainstream magazines and  
15 those pictures could be a picture of a hand  
16 or a foot, they didn't necessarily  
17 constitute -- I know where you are headed  
18 with this and it's nowhere appropriate and  
19 it's really unattractive.

20 Q. I'm not headed anywhere. I'm just  
21 asking the questions. Did you give Jeffrey  
22 Epstein any of these pictures that you took  
23 of females in the state that you described?

24 A. I can't recall ever giving him  
25 pictures but it is possible that I took

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2 pictures of people that would end up -- or a  
3 friend of his that he would have -- not naked  
4 or not inappropriate in any way, that he  
5 might have somewhere in his house.

6 Q. Name for me all the individuals who  
7 you took these pictures of?

8 A. It's entirely impossible for me to  
9 name people. First of all, it was just -- it  
10 would not be possible, I took thousands of  
11 photos, not of people, I mostly take pictures  
12 of landscapes and things. I have no  
13 recollection specifically of people that I  
14 took pictures of.

15 Q. So you can't remember, is it your  
16 testimony you can't remember one person that  
17 you took a picture of in either a naked or  
18 semi naked state?

19 A. I seriously cannot recall. I just  
20 don't recall.

21 Q. Did you take a picture of Virginia  
22 Roberts either alone or with another  
23 individual in a naked state?

24 A. I have never taken, I believe, any  
25 pictures of two people in any type of

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2 situation, naked as you describe.

3 Q. Did you take a picture of Virginia  
4 Roberts on her own without another individual  
5 in it in a naked state?

6 A. I don't recall ever taking a  
7 picture of Virginia -- naked, we are not  
8 referring to someone with no clothing on at  
9 all, we are referring to someone that could  
10 be semi clad or could have a towel or we are  
11 not referring to anything inappropriate.

12 Q. Was this a hobby of yours to take  
13 pictures of the type that you are describing?

14 MR. PAGLIUCA: Object to the form.

15 A. I just testified, I didn't take  
16 pictures of many people. My preference is  
17 pictures for landscapes and for architectural  
18 pieces.

19 Q. Where are those pictures today?

20 A. I have no idea.

21 Q. Do you have them in your home?

22 A. I do not.

23 Q. Do you have them on your computer?

24 A. I do not.

25 Q. What has Jeffrey Epstein told you

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2 about the allegations related to the criminal  
3 investigation that he was involved in?

4 A. I really can't say, not because I  
5 don't want to say but I just think of what he  
6 has said to me over the course of this time.

7 Q. Did he explain it to you and  
8 explain what the charges were against him?

9 A. I never had a detailed conversation  
10 with him, as I recall.

11 Q. Not detailed, just did he explain  
12 anything that was happening to him?

13 A. I haven't spoken to him for so  
14 long. I can't possibly testify to what  
15 conversations I had with him over the course  
16 of time.

17 Q. Did he talk to you about any of the  
18 girls that were making allegations against  
19 him other than Virginia?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. You are talking about the police  
23 records again, all of that?

24 Q. Yes.

25 A. I have never had a conversation

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2 about those things.

3 Q. What has Jeffrey Epstein told you  
4 about Virginia Roberts?

5 A. That she is a liar.

6 Q. What does he base that on?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. You would have to check with him.  
10 I can tell you why I think she is a liar, I'm  
11 happy to do that.

12 Q. Did he tell you he did not have  
13 sexual relations with Virginia Roberts?

14 A. I can only testify what I know.

15 Q. I'm asking, has he told you that he  
16 did not have sexual relations with Virginia  
17 Roberts?

18 A. I can only tell you what I know  
19 about Virginia Roberts, I cannot tell you  
20 what he knows about Virginia Roberts.

21 Q. I'm asking, did he tell you that he  
22 did not have sexual relations with Virginia  
23 Roberts?

24 A. All he told me is she is a liar.

25 Q. That's all he said about Virginia

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2 Roberts?

3 A. We went through all the lies that  
4 you have sold to the papers and sold in  
5 general and we have analyzed her lies and  
6 your lies and your inappropriate behavior in  
7 detail.

8 Q. Did he ever say that he did not  
9 have sexual relations with Virginia Roberts?

10 A. I just testified that we went  
11 through all of her lies.

12 Q. I understand what you said. I'm  
13 asking you a question.

14 Did he ever tell you that he never  
15 had sex with Virginia Roberts?

16 A. I don't recall whether he ever -- I  
17 don't know I ever had that question. We  
18 focused on the lies she did say she had with  
19 him as relates to me. I don't remember  
20 asking him about his problems with her. I'm  
21 interested in what she says about myself.

22 Q. Did you also talk about what things  
23 that Virginia Roberts was saying that were  
24 true?

25 A. There isn't anything that she said

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2 that was true.

3 Q. Nothing she said that you are aware  
4 of is true?

5 A. I think she is correct when she  
6 talks about what her name is.

7 Q. Anything else?

8 A. I'm sure there must be one or two  
9 other details but they are so far and few  
10 between, I would have to look in detail at  
11 all of her allegations to pinpoint what  
12 possibly could be true.

13 Q. Did you ever ask Jeffrey if he had  
14 sex with minors?

15 A. I have never been asked that  
16 question.

17 Q. You never asked him that question.

18 What analysis did Jeffrey do to  
19 determine that the statements Virginia  
20 Roberts were making were lies?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. Ask me again, please.

24 Q. What analysis did Jeffrey do to  
25 determine that the statements that Virginia



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2 Roberts were making were lies?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation. And to the extent  
5 that any of this answer calls for any  
6 privileged communication, I'm  
7 instructing, with myself or another  
8 lawyer representing you or in any common  
9 interest agreement, I'm instructing you  
10 not to answer.

11 MS. McCAWLEY: The court ruled she  
12 is entitled and you had to produce  
13 documents about communications with  
14 Jeffrey, that's what I'm asking about.  
15 I'm not asking about communications with  
16 lawyers.

17 Q. I'm asking what analysis did  
18 Jeffrey do to determine that the statements  
19 that Virginia Roberts was making were lies,  
20 if you know?

21 MR. PAGLIUCA: My objection is to  
22 the extent she learned any of that  
23 information as a result of either a  
24 privileged communication from a lawyer,  
25 one of her lawyers or a privileged

1 G Maxwell - Confidential  
2 communications subject to a joint  
3 defense agreement or common interest  
4 agreement, I'm telling her not to  
5 answer. To the extent she has  
6 information outside of those things, she  
7 is permitted to answer.

8 Q. Do you understand?

9 So if it was a conversation with a  
10 lawyer which I'm not asking about, I don't  
11 want you to tell me about your conversations  
12 with lawyers.

13 I want you to tell me whether  
14 Jeffrey Epstein ever told you what he  
15 analyzed in order to determine which of -- of  
16 what Virginia were saying were lies?

17 A. I do not know what he did, no.

18 So you agree she is lying, Singrid.

19 Q. I do not agree with that and I'm  
20 asking the questions.

21 A. You just said her lies.

22 Q. I'm repeating a statement you made.

23 Q. Are you saying it's an obvious lie  
24 that Jeffrey Epstein engaged in sexual  
25 conduct with Virginia while Virginia was

1 G Maxwell - Confidential

2 underage?

3 A. I can only testify to what I saw  
4 and what I was present for, so if you are  
5 asking me what I saw then I am happy to  
6 testify. I cannot testify to what somebody  
7 else did or didn't do.

8 Q. Did you issue a statement to your  
9 press agent, Ross Gow in 2015, stating that  
10 Virginia Roberts' claims were, quote, obvious  
11 lies?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 Q. You can answer.

15 A. You need to reask me the question.

16 Q. Sure.

17 Did you issue a press statement  
18 through your press agent, Ross Gow, in  
19 January of 2015, stating that Virginia  
20 Roberts' claims were, quote, obvious lies?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. Can you ask it a different way,  
24 please?

25 Q. I will ask it again and you can

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2 listen carefully.

3 Did you issue a press statement  
4 through your press agent, Ross Gow, in  
5 January of 2015, where you stated that  
6 Virginia Roberts' claims were, quote, obvious  
7 lies?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. So my lawyer, Philip Barden  
11 instructed Ross Gow to issue a statement.

12 Q. Today, did you say that Virginia  
13 lied about, quote, absolutely everything?

14 A. I said that there are some things  
15 she may not have lied about.

16 Q. So are you saying it's an obvious  
17 lie that Jeffrey Epstein engaged in sexual  
18 contact with Virginia while Virginia was  
19 underage?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. Can you ask the question again,  
23 please?

24 Q. Are you saying it's an obvious lie  
25 that Jeffrey Epstein engaged in sexual

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2 conduct with Virginia while Virginia was  
3 underage?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 Q. You can answer.

7 A. Try again, please.

8 Q. Are you saying that it's an obvious  
9 lie that Jeffrey Epstein engaged in sexual  
10 conduct with Virginia while Virginia was  
11 underage?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. Again, I'm telling you, first of  
15 all, it was a statement that was issued by my  
16 lawyer and -- through my lawyer to Ross Gow.

17 Q. I understand that. I'm asking you,  
18 are you saying that it's an obvious lie that  
19 Jeffrey Epstein engaged in sexual conduct  
20 with Virginia while Virginia was underage.

21 Is that a lie?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 Q. You can answer.

25 A. So I cannot testify to what Ross

1                   G Maxwell - Confidential  
2           Gow and Philip Barden decided to put -- I can  
3           testify to what Virginia's obvious lies are  
4           as regards to me. I cannot make  
5           representations about all the many lies she  
6           may or may not have told about Jeffrey.

7           Q.     So is Virginia lying when she says,  
8           is it an obvious lie when she says that she  
9           had sex with Jeffrey Epstein while she was  
10          underage?

11                  MR. PAGLIUCA:  Objection to the  
12                  form and foundation.

13           A.     Again, I'm testifying to what I  
14           know to be true. I can only testify to all  
15           the many lies she told about me. I cannot  
16           testify to what lies she told about somebody  
17           else. Given she told so many about me, one  
18           can probably infer she is lying about  
19           everything.

20           Q.     So you think she is lying when she  
21           said she had sex with Jeffrey Epstein when  
22           she was underage?

23                  MR. PAGLIUCA:  Objection to the  
24                  form and foundation.

25           A.     Again, I can only talk about what I

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2 can positively say myself, not what somebody  
3 else is going to represent.

4 Q. When you were saying that she was,  
5 her claims of having sex with Jeffrey Epstein  
6 were obvious lies, are you saying she is  
7 lying about engaging in sexual conduct with  
8 Jeffrey Epstein when she was underage?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 Q. You can answer.

12 A. Again, this was a statement that  
13 was put out from my lawyer through my press  
14 person in London. And I can only testify to  
15 the obvious lies that she says about me. I  
16 cannot make representations about lies she  
17 says about someone else, but she lies so many  
18 times about me, one can probably infer she is  
19 lying about everything.

20 Q. So is she not lying when -- is she  
21 telling the truth when she says she had sex  
22 with Jeffrey Epstein when she was underage?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. Again, I don't know how else to

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2 tell you, I can only talk about what I know  
3 to be true. What I know is her story about  
4 how she claims that initial situation  
5 happened is so egregiously false and such a  
6 giant fat enormous, repulsive, disgusting,  
7 inappropriate, vile lie, that that I can  
8 testify to.

9 Q. Was she lying when she said she met  
10 you at Mar-a-Lago?

11 A. Again I already testified I don't  
12 recall meeting her at Mar-a-Lago.

13 Q. We showed you a document where you  
14 said you met her at Mar-a-Lago when she was  
15 17, is that correct?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. I think I already testified to  
19 that. What I remembered based on all the  
20 rubbish she has written and all the many  
21 articles I have read, maybe in the moment  
22 when I wrote that, have caused me to have  
23 that but on reflection I don't recall it as I  
24 sit here today.

25 Q. Are you saying that it was an



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2 obvious lie that you approached Virginia  
3 while she was under age at Mar-a-Lago?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. First of all, we can all agree  
7 here, all of you sitting here that the lies  
8 that you perpetrated in the press that she  
9 was 15 and we should all agree now that that  
10 is fake, a lie that was perpetrated between  
11 all of you to make the story more exciting,  
12 can we agree on that?

13 Q. That is not my question.

14 A. Can we agree she was not the age  
15 she said and you put that in the press, that  
16 is obviously, manifestly, absolutely, totally  
17 a lie.

18 MS. McCAWLEY: I am going to put on  
19 the record, Ms. Maxwell very  
20 inappropriately and very harshly pounded  
21 our law firm table in an inappropriate  
22 manner. I ask she take a deep breath,  
23 and calm down. I know this is a  
24 difficult position but physical assault  
25 or threats is not appropriate, so no

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2 pounding, no stomping, no, that's not  
3 appropriate,.

4 A. Can we be clear, I didn't threaten  
5 anybody.

6 MR. PAGLIUCA: Stop, you made your  
7 record, there is no dent in the table.  
8 I don't see any chips. Can we take a  
9 break now.

10 MS. McCAWLEY: I think it's  
11 appropriate to take a break.

12 THE VIDEOGRAPHER: It's 1:56 and we  
13 are off the record.

14 (Recess.)

15 THE VIDEOGRAPHER: It's now 2:13,  
16 we're starting disk No. 5 and we are  
17 back on the record.

18 Q. Ms. Maxwell, how old was Virginia  
19 Roberts when you met her in Mar-a-Lago?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I know today that she was 17 years  
23 old.

24 Q. Are you saying that it's an obvious  
25 lie that Virginia traveled on Jeffrey

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2 Epstein's airplanes?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 Q. You can answer.

6 A. Are you referring to my statement  
7 where that says that?

8 Q. I'm referring to the language you  
9 use in your statement that says, obvious  
10 lies?

11 A. Can you read my entire statement?

12 Q. Sure, let me pass it out.

13 (Maxwell Exhibit 10, email, marked  
14 for identification.)

15 Q. This is Bates GM 00068 and we will  
16 mark it as -- what you have in front of you  
17 is a statement at the top. This was produced  
18 by your counsel, it is indicated Bates No.  
19 GM 00068. At the top the date reflects  
20 January 2, 2015 from, appears to be a Ross ■  
21 ■ subject line, is you and  
22 then there is a number of individuals you can  
23 see at the top that are copied on this that  
24 is sent to and bcc'd on this statement.

25 The statement, there are two parts

1           G Maxwell - Confidential  
2       of it. There is an opening email that says,  
3       please find an attached quotable statement on  
4       behalf of Ms. Maxwell and there is more  
5       language there and it's from Ross Gow and  
6       then it says in the body of it, Jane Doe No.  
7       3 or Jane Doe 3 is Virginia Roberts so not a  
8       new individual. The allegations made by, and  
9       it says Victoria but I believe that means  
10      Virginia Roberts, against Ghislaine Maxwell  
11      are not true. The original allegations are  
12      not new and have been fully responded to and  
13      shown to be untrue. And the next paragraph  
14      says, Each time the story is retold, it  
15      changes with new salacious details about  
16      public figures and world leaders and now it  
17      is alleged by Ms. Roberts that Al Dershowitz  
18      is involved in having sexual relations with  
19      her which he denies. Ms. Roberts claims are  
20      obvious lies and should be treated as such  
21      and not publicized as news as they are  
22      defamatory.

23           The last paragraph states,  
24      Ghislaine Maxwell's original response to the  
25      lies and defamatory claims remains the same.

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2 Maxwell strongly denies allegations of the --  
3 strongly denies allegations of an unsavory  
4 nature which have appeared in the British  
5 press and elsewhere and reserves her right to  
6 seek redress at the repetition of such old  
7 defamatory claims.

8 Are you saying that it's an obvious  
9 lie that Virginia Roberts traveled on Jeffrey  
10 Epstein's planes?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I'm saying what's an obvious lie  
14 and I think we can all agree, you just had  
15 the case tossed out by Alan Dershowitz. He  
16 just got removed from the case because you  
17 put him in a case that he wasn't supposed to  
18 be in so what was said about him is not true.

19 Q. Are you saying that it's an obvious  
20 lie that Virginia Roberts traveled on Jeffrey  
21 Epstein's plane?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. You have given me plane records  
25 that has her name on it but as I already

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2 testified those aren't federally mandated  
3 things and I can see her name on it but  
4 that's what I -- I told you I don't recall  
5 her on any planes.

6 Q. Is is that one of Virginia's  
7 obvious lies?

8 A. There are more obvious ones.

9 Q. Is that one of them?

10 A. I can't testify to her being on a  
11 plane or not.

12 Q. So is that an obvious lie?

13 A. There are more obvious lies, like  
14 Clinton.

15 Q. I understand there are more obvious  
16 ones. I'm asking you, is the fact that she  
17 said she traveled on Epstein's planes an  
18 obvious lie?

19 A. I think we can probably say because  
20 you see her name on a plane record and she  
21 went from A to B, that would not be the  
22 obvious lie that I would pick.

23 Q. What obvious lie were you picking  
24 when you made this statement?

25 A. There are so many that I would be

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2 thrilled to go through all of them.

3 Q. Let's go through them.

4 What's the first one?

5 A. Her characterization of the first  
6 meeting at Mar-a-Lago.

7 Q. What part of that was an obvious  
8 lie?

9 A. The characterization that she said  
10 that she said she was accosted. She looked  
11 like, as best as I can recall, if I met her  
12 in Mar-a-Lago as she claims, she worked at  
13 Mar-a-Lago, she claims, and her statement she  
14 worked at Mar-a-Lago, she would have been  
15 dressed as all the spa people in Mar-a-Lago  
16 would have been. It would have been  
17 impossible to identify her as someone other  
18 than someone who worked at a spa. She made  
19 many claims, she has been a bathroom  
20 attendant, front of house attendant, we don't  
21 know what she was, so her obvious lies are  
22 her contradictory of her own personal  
23 statements within that.

24 Q. So what part of her statement  
25 relating to Mar-a-Lago --

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2 A. I'm carrying on.

3 Q. I'm sorry. I thought you were  
4 done.

5 A. Please. Her statement also that  
6 she was driven by her father to Palm Beach.  
7 She was driven by her mother, as a matter of  
8 fact. Her whole entire characterization of  
9 the first meeting with Jeffrey, as I was  
10 outside speaking to her mother.

11 Q. Let me stop you there, so we don't  
12 get too far ahead. Let me make sure I  
13 understand your testimony.

14 The first, in the first piece when  
15 you were talking, I believe you said and  
16 correct me if I'm wrong, that her  
17 characterization of the first meeting at  
18 Mar-a-Lago was an obvious lie.

19 What part of that meeting was an  
20 obvious lie?

21 A. By her own testimony, all her  
22 various many different descriptions of what  
23 she was or wasn't or where she was or wasn't,  
24 they have all changed. She was either front  
25 of house or bathroom attendant. I don't know



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2 what she was, so just by her own words, one  
3 doesn't know what's true and what isn't true.

4 Q. Are you saying what position she  
5 said she was working in, is that what you are  
6 considering the obvious lie?

7 A. I said inconsistency within her own  
8 statement from everything, so in the  
9 beginning it starts off with different  
10 statements.

11 Q. Then I believe you said the second  
12 piece was that she was driven by her father?

13 A. I said she was driven by her  
14 mother.

15 Q. That's the obvious lie?

16 A. It's an obvious lie to me.

17 Q. You said why don't you state it in  
18 your own words but the characterization of  
19 how she was with Jeffrey, what about that is  
20 an obvious lie?

21 A. I was standing outside talking to  
22 her mother so the entire story is a  
23 fabrication.

24 Q. Did she not have sex with Jeffrey  
25 Epstein during that first massage?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I was talking to her mother so...

5 Q. Do you know whether that's an  
6 obvious lie, whether she had sex in that room  
7 or not?

8 A. Her story about what happened --  
9 let's also be -- the story as first hit the  
10 press was that somebody else led her to  
11 Jeffrey's room, it was not me and then it  
12 turned to being me so we have an obviously  
13 important inconsistency, lie in my -- that's  
14 how I would characterize a lie. It cannot be  
15 me or somebody else, it can only be one or  
16 the other.

17 Q. Who is the other person she said  
18 took her to the room?

19 A. Why don't you ask her.

20 Q. I'm asking you.

21 A. How would I possibly know.

22 Q. You are saying that's a lie.

23 A. It was a lie in the papers, she  
24 said it in the newspaper, it was in the  
25 newspaper.

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2 Q. How do you know she wasn't  
3 identifying you?

4 A. She said somebody.

5 Q. How do you know that somebody  
6 wasn't you?

7 A. Why did it suddenly become me, why  
8 not say it was me and be done with it.

9 Q. So it's a lie because she  
10 originally may not have named you and then  
11 named you later?

12 A. It's obviously inconsistent to  
13 somebody who wasn't me.

14 Q. How do you know it wasn't you?

15 A. I know it wasn't me because I was  
16 talking to her mother.

17 Q. But she then named you, is what you  
18 are saying?

19 A. That's an obvious lie.

20 Q. She named you?

21 A. It's an obvious lie because I  
22 wasn't even in the house.

23 Q. Is it an obvious -- who did lead  
24 her up to Jeffrey's room while you were  
25 talking to her mother?

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2 A. You would have to ask Virginia, I  
3 don't know if she was led up to his room.

4 Q. You were standing with the mother,  
5 is that correct?

6 A. That's correct.

7 Q. Who was working at the house that  
8 day?

9 A. I believe John Alessi was.

10 A. Would John Alessi typically lead  
11 someone up to the room where Jeffrey was  
12 having a massage?

13 A. I don't know she was led up to the  
14 room to have a massage.

15 Q. She would have found her way on her  
16 own?

17 A. I would suggest that that entire  
18 story never happened at all in any of its  
19 form.

20 Q. If you stood outside with the  
21 mother, what did you think happened inside  
22 then?

23 A. I believe that somebody, it wasn't  
24 me, John Alessi probably took her to meet  
25 Jeffrey Epstein while he was working at his

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2 desk and they had a conversation.

3 Q. Did Jeffrey tell you that?

4 A. No but that would have been a  
5 normal interaction. I don't believe for a  
6 second -- I know her entire characterization  
7 didn't happen because I was outside talking  
8 to her mother the entire time.

9 Q. Why would she have come for a  
10 massage and not given a massage?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. We are talking about her  
14 characterization of the first time that she  
15 came to the house.

16 Q. If I'm following you correctly,  
17 you're saying she walked in and would have  
18 gone to -- it's your assumption she would  
19 have gone and talked to Jeffrey and left?

20 A. When I was working for Jeffrey,  
21 typically he would meet someone before  
22 getting a massage from them to see if he  
23 wanted to have a massage from them,  
24 typically.

25 Q. So he would not have someone come

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2 up to the room and start a massage?

3 A. He would not.

4 Q. So the young girls in the police  
5 report who say they came over and were led up  
6 to the room on the first day, would they be  
7 wrong about that?

8 MR. PAGLIUCA: Objection to form  
9 and foundation.

10 A. I can't comment what happened when  
11 I was not at the house. I can only comment  
12 when I was at the house.

13 Q. Was there ever a time where a woman  
14 came to the house for the first time to give  
15 a massage and Jeffrey had the massage that  
16 day?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. Can we talk about adult  
20 professional masseuses, please?

21 Q. I'm asking, whether adult or  
22 underage?

23 A. I'm not interested in talking about  
24 underage. I can only testify to what I know,  
25 professional masseuses, adult, I cannot

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2 testify to anything else.

3 Q. Why can't you testify to an  
4 underage girl that came over and was led up  
5 to the room for a massage?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. The police records you are  
9 referring to?

10 Q. You are saying that didn't happen.  
11 You're saying I can only testify to adults  
12 that came for an interview and were led up to  
13 the room. Why can't you testify to whether  
14 an underage girl was brought in for an  
15 interview and led up --

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 Q. Go ahead.

19 A. Can you reask the question.

20 Q. Why can't you testify as to an  
21 underage girl who came over for an interview  
22 and then was then led up to the room for the  
23 massage?

24 A. You've mangled your entire  
25 question. Can you please reask that in a way

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2 that I can answer it correctly?

3 Q. Why can you not testify as to  
4 whether an underage girl, you said you can  
5 testify as to females that were over the age  
6 of 18, why can't you testify as to whether an  
7 underage girl came over for an interview and  
8 on the same day --

9 A. I don't know what you mean by  
10 interview.

11 Q. You just said that Jeffrey Epstein  
12 interviewed, it was your word, interviewed  
13 the masseuses before they gave massages, is  
14 that correct?

15 A. The word interview is making me --  
16 I'm English, so you could have some  
17 difficulty understanding the way I  
18 communicate.

19 Q. I'm using your word.

20 A. Then I will reuse it a different  
21 word. He would meet them because receiving a  
22 massage is something you want to make sure  
23 you are comfortable with the person and so  
24 interview is not the correct word but you  
25 would meet them to have a conversation with



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2 them to see if you want to have a massage  
3 with that person.

4 Q. Did Jeffrey Epstein ever meet an  
5 underaged girl and on the same day receive a  
6 massage from that girl?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I can't possibly testify to what  
10 happened after I was not at the house.

11 Q. If you are aware, at any time you  
12 were at the house, did you ever see that?

13 MS. MENNINGER: Let her finish the  
14 question.

15 A. I can only testify to people who  
16 were adult professional masseuses who came to  
17 the house. I cannot testify to something I'm  
18 not party to and don't know about. I can  
19 only testify to what I saw. So when  
20 professional adult masseuse, male and/or  
21 females would come to the house, typically  
22 when I was there, typically he would meet  
23 with them prior, to have a conversation with  
24 them about their experience, whatever, to  
25 decide whether it would then A, if he had

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2 time for a massage at that time or B, whether  
3 he could have a massage at that moment.

4 Q. Was Virginia an adult when she came  
5 over, was she over 18?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. I think we established, as of  
9 today, we are all aware, everyone in this  
10 room that she was 17.

11 Q. So you have been present when a  
12 minor was brought over for a massage for  
13 Jeffrey?

14 A. Can I say, as you are able to have  
15 a massage at 17, so she came as a masseuse.

16 Q. I'm not saying whether or not you  
17 are able to. I'm saying you've been present  
18 at Jeffrey's home when an underage minor has  
19 come over to give him a massage?

20 A. That's just not how that works.  
21 You are able to be a masseuse at 17 so she  
22 came to give -- for a massage, at 17 you are  
23 able to come and give a massage.

24 Q. I'm not asking whether she is able  
25 to do it. I'm asking whether you were

1 G Maxwell - Confidential  
2 present at the home when a girl under the age  
3 of 18 came over for the purposes of giving a  
4 massage?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 Q. You can answer.

8 A. You can be a professional masseuse  
9 at 17 in Florida, so as far as I am aware, a  
10 professional masseuse showed up for a  
11 massage. There is nothing inappropriate or  
12 incorrect about that and your  
13 mischaracterization of it, I think is  
14 unfortunate.

15 Q. How many teenagers did he have that  
16 were professional masseuses that worked in  
17 his home?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 Q. How many?

21 A. First of all, I am not aware of  
22 teenagers who worked in his home.

23 Q. You are aware of Virginia Roberts  
24 and you've stated she was 17 and she worked  
25 for him, correct?

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2 A. No. I did not state that at all,  
3 you are mischaracterizing my words and what I  
4 said.

5 What I said was that we can all  
6 agree and I think at this point there is not  
7 one person in this room, however much you  
8 would like her to be younger, to say she was  
9 not 17 because that has been a very offensive  
10 thing that you have all done. So she was 17.  
11 At 17 you are allowed to be a professional  
12 masseuse and as far as I'm concerned, she was  
13 a professional masseuse. There is nothing  
14 inappropriate or incorrect about her coming  
15 at that time to give a massage. Her entire  
16 characterization of her first time at the  
17 house was to me an obvious lie, given it was  
18 impossible for her entire story to take place  
19 given I was speaking to her mother the entire  
20 she was at the house.

21 Q. So it was impossible that day, that  
22 first day she came and you were speaking to  
23 the mother, for Virginia Roberts to have had  
24 sex with Jeffrey Epstein during the time that  
25 you were outside with her mother?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. You, again, are completely  
5 mischaracterizing. I can only testify to  
6 what I heard obvious lies about me and her  
7 obvious lies about me are that she, as you  
8 put out to the papers and every other which  
9 way, went upstairs with her, didn't happen.  
10 So that to me is an absolute, obvious lie. I  
11 also don't believe that her -- her  
12 mischaracterization of the length of time she  
13 was there because as I recall, she just met  
14 with Jeffrey and then left with her mother.  
15 That's my recollection.

16 Q. So you were standing outside the  
17 entire time that Virginia was in the house,  
18 is that correct?

19 A. That is correct.

20 Q. So can you testify as to whether or  
21 not, do you know either from Jeffrey or any  
22 other source whether or not Virginia Roberts  
23 had sex with Jeffrey on that first day that  
24 she was at the house?

25 A. We can categorically state,

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2 absolutely 1000 percent that she did not have  
3 any type of sexual relations as described by  
4 you in your court papers that took place  
5 because those allegedly according to her lies  
6 involved some aspect of me.

7 As I was standing outside with her  
8 mother the entire time, her entire story is a  
9 lie. Therefore, to ask me what she did or  
10 didn't do during that time, I can only  
11 testify to what she said about me, which was  
12 1000 percent false.

13 Q. So let's not take the first time,  
14 let's take the next time she comes.

15 A. No no, how can do you that, when  
16 the basis of this entire horrible story that  
17 you have put out is based on this first  
18 appalling story that was written, repeated,  
19 multiply by the press that lied about her  
20 age, lied about the first time she came, lied  
21 about and characterized the entire first  
22 time. I have been so absolutely appalled by  
23 her story and appalled by the entire  
24 characterization of it and I apologize  
25 sincerely for my banging at the table

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2 earlier, I hope you accept my apology. It's  
3 borne out of years of feeling the pressure of  
4 this entire lie that she has perpetrated from  
5 our first time and whilst I recognize that  
6 was -- I hope you forgive me sincerely  
7 because it was just the length of time that  
8 that terrible story has been told and retold  
9 and rehashed when I know it to be 100 percent  
10 false.

11 Q. So not the first time she came, but  
12 the second time she came or the third time or  
13 any time she came, did you ever participate  
14 in a massage with her in Jeffrey Epstein's  
15 room?

16 A. I have never participated at any  
17 time with Virginia in a massage with Jeffrey.

18 Q. Have you ever participated at any  
19 time with Virginia in any kind of sexual  
20 contact or sexual touching with Jeffrey and  
21 Virginia?

22 A. I have not.

23 Q. So we were going through the list  
24 of obvious lies and you were talking about  
25 the first time which I believe we have

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2 completed but you can add to that if you need  
3 to.

4 What other obvious lies did  
5 Virginia Roberts tell that you were referring  
6 to in your statement?

7 A. Oh my goodness. Well, I think we  
8 can totally cover the Clinton story, the  
9 story that I flew him with Secret Service and  
10 there was a dinner with other people and that  
11 entire thing is 100 percent fictitious. I  
12 have testified for the record and I'm happy  
13 to do it again, that I have never flown Bill  
14 Clinton, myself as a pilot in a helicopter at  
15 any time, anyplace, at any time, to any part  
16 of the world.

17 Q. What other obvious lies were you  
18 referring to?

19 A. She was referring to Al Gore, she  
20 is referring to a bunch of people. I don't  
21 believe Al Gore ever came to the island at  
22 any time ever. I don't even know Al Gore  
23 actually.

24 Q. Just one moment, I want to hear all  
25 of them, but when you say you don't believe



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2 Al Gore ever came to the island, do you know  
3 whether Al Gore ever came to the island?

4 A. Al Gore never came to the island.

5 Q. How do you know that?

6 A. Jeffrey doesn't know him, I don't  
7 know him and I think had Al Gore -- I don't  
8 think -- had Al Gore gone to the island  
9 during the period when I would have been  
10 involved in organizing a trip, I would have  
11 been aware of it.

12 Q. So go ahead, you had another one.

13 A. It would be easier if I could see,  
14 do you mind if I take a reference at some of  
15 these newspaper articles or you just want me  
16 to go from memory.

17 Her entire characterization of what  
18 took place in London at my house with Prince  
19 Andrew.

20 Q. Was it an obvious lie that she was  
21 at your house in London?

22 A. We can't really establish the  
23 photograph and all that. I don't know if  
24 that's true, if that's a real picture or not.

25 Q. So you dispute that you were

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2 actually photographed in your town home in  
3 London --

4 A. I don't recognize that picture.  
5 I'm not sure if that's a real picture or not.

6 Q. And have you talked to Prince  
7 Andrew about that picture?

8 A. We discussed Virginia's entire tail  
9 and he asked me if he even knew her.

10 Q. So did Prince Andrew tell you that  
11 he did not have sex with Virginia Roberts?

12 A. He doesn't even know who Virginia  
13 Roberts is.

14 Q. Did he tell you that he didn't have  
15 sex with her?

16 A. It would be difficult to have sex  
17 with someone you don't know.

18 Q. He may not remember her?

19 A. I think the inference is he didn't  
20 know who she was, he didn't have any  
21 recollection of her whatsoever.

22 Q. Has Prince Andrew ever come to your  
23 London town home?

24 A. Yes. Ever being the entire time I  
25 owned my house, yes.

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2 Can I go on on her obvious lies?

3 Q. If you have more.

4 A. I have -- her entire  
5 characterization -- I took her shopping into  
6 Burberry and bought her a very expensive  
7 dress and if this photo were real and if this  
8 is -- I would never -- the outfit doesn't  
9 work at all so --

10 Q. Do you not remember taking her  
11 shopping or are you saying it's an obvious  
12 lie, you know you did not take her shopping?

13 A. I did not take her shopping. I did  
14 not buy her a \$5,000 handbag.

15 Q. Did Jeffrey buy her a \$5,000  
16 handbag?

17 A. Her accusation was that I did.

18 Q. Do you know if Jeffrey bought her a  
19 handbag during that trip to London?

20 A. I don't know what he did. She  
21 accused me, I can't physically remember  
22 buying a \$5,000 not for her, not for anyone,  
23 not for me.

24 Q. Did you ever go shopping with  
25 Virginia?

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2 A. I don't recall ever shopping with  
3 Virginia.

4 Q. Did you have more to go over or did  
5 you want me to ask my questions?

6 A. The entire characterization of what  
7 took place in my house in London would have  
8 been impossible.

9 Q. Can I ask, do you still have it,  
10 the picture of the London town home with you  
11 in it, Giuffre 00407.

12 As you are looking at this picture,  
13 Ms. Maxwell, as I'm looking at it it's on the  
14 right-hand side, there appears to be a  
15 picture hanging on the wall, do you recall  
16 that in your London town home?

17 A. It's a little difficult to see.

18 Q. Do you recall having a picture on  
19 the wall there by the room where you're  
20 standing?

21 A. I do have a picture.

22 Q. Do you recall on the left-hand side  
23 having a railing that looks like that with  
24 sort of a bubble wood top?

25 A. I do.

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2 Q. So are you saying that it's an  
3 obvious lie that Virginia's statement that  
4 she had sex with Prince Andrew is an obvious  
5 lie?

6 A. What I'm representing is that her  
7 entire ludicrous and absurd story of what  
8 took place in my house is an obvious lie.

9 Q. Including she had sex with Prince  
10 Andrew?

11 A. She claimed things took place in my  
12 bathroom in London. Her characterizations is  
13 just not possible.

14 Q. So you're saying it's an obvious  
15 lie -- that she was telling an obvious lie  
16 when she said she had sex with Prince Andrew?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation. The witness  
19 answered the question.

20 A. I'm saying within the context of  
21 all the stories she told, this particular  
22 story -- back up, she claimed we went out at  
23 night. I've already testified if -- Prince  
24 Andrew is such a famous person, if he went to  
25 a nightclub, it would have been reported by

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2 the press at that time. She characterized  
3 that Prince Andrew drank alcohol. Prince  
4 Andrew tea total.

5 She then characterized things took  
6 place in my bathroom in the bathtub itself.  
7 The tub is too small for any type of activity  
8 whatsoever.

9 Q. Is Club Tramp the name of a London  
10 club, is that a club you heard of?

11 A. It's not called Club Tramp, it's  
12 called Tramp.

13 Q. That would be a club located in  
14 London?

15 A. Yes.

16 Q. Are you saying that it was an  
17 obvious lie when Virginia said that you made  
18 her dress up in a school girl outfit?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I already testified that, first of  
22 all, I don't know what you are taking about,  
23 I already testified I didn't get her outfits  
24 and all of that.

25 Q. Is it an obvious lie that Virginia

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2 was paid to go to give a massage to Glenn  
3 Dubin at the Breakers?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I cannot testify to what Virginia  
7 did outside of -- I can't testify to what she  
8 did, who she gave massages to.

9 Q. So you don't know on that one?

10 A. Of course I don't know.

11 Q. Do you agree that it's  
12 psychologically harmful to have sex with a  
13 minor?

14 MR. PAGLIUCA: Objection to form  
15 and foundation.

16 A. What are you asking me?

17 Q. I'm asking if is it psychologically  
18 harmful for an adult to have sex with a  
19 minor?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I don't know what you are asking.  
23 This has nothing to do with Virginia Roberts.

24 Q. It does.

25 A. How does it?

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2 Q. I ask the questions, you answer.

3 If you can't answer, you can say I don't  
4 know.

5 But my question is, do you agree  
6 that it's psychologically harmful to have sex  
7 with a minor?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. Are you giving me a random question  
11 and as not relates to this case and not  
12 relates to anything. It's obviously not  
13 something that you want to have happen.

14 Q. Do you agree that Jeffrey Epstein  
15 has harmed many minors by having sex with  
16 them?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I can't testify to what Jeffrey did  
20 or didn't do. I have no knowledge of what  
21 you are asking me.

22 Q. If Jeffrey had sex with minors,  
23 would you agree that that could harm a minor?

24 MR. PAGLIUCA: Object to the form  
25 and foundation.



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2 A. Again, I am not testifying to what  
3 Jeffrey did or did not do because I cannot.

4 Q. You don't know whether Jeffrey  
5 Epstein ever had sex with a minor?

6 A. Again, I cannot testify to what  
7 Jeffrey did or didn't do. I cannot.

8 Q. You never observed him having sex  
9 with a minor?

10 A. I never observed Jeffrey having sex  
11 with a minor.

12 Q. Do you agree that calling a sex  
13 abuse victim a liar when she speaks about her  
14 abuse can cause psychological harm?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. Can you repeat the question.

18 Q. Do you agree calling a sex abuse  
19 victim when she speaks about her abuse can  
20 cause psychological harm?

21 MR. PAGLIUCA: Objection to form  
22 and foundation.

23 A. Say it again.

24 Q. Do you agree that calling a sexual  
25 abuse victim a liar can cause psychological

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2 harm.

3 MR. PAGLIUCA: Object to the form  
4 form and foundation.

5 A. I would like to say all the  
6 terrible things Virginia Roberts said about  
7 me is extremely harmful and you should turn  
8 that around. All the lies she has said and  
9 you have backed her on have been extremely  
10 damaging to me.

11 So what I can testify to is that  
12 somebody who has made these outrageous  
13 allegations and who is a serious liar and  
14 that I know for a fact is a liar, that I can  
15 testify is damaging to me.

16 Q. Do you agree that calling a sexual  
17 abuse victim a liar when she speaks out about  
18 her abuse can cause psychological harm?

19 MR. PAGLIUCA: Are you asking a  
20 hypothetical question?

21 MS. McCAWLEY: Yes.

22 A. You are asking me to speculate?

23 Q. I'm not asking you to speculate .  
24 If somebody is a sexual abuse victim --

25 A. I can't testify to what some random

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2 hypothetical person that you are asking me to  
3 speculate on their mental state or health  
4 versus speculative statement. I can't do  
5 that, that's just not right.

6 Q. Do you agree that by calling  
7 Virginia Roberts a liar when she was subject  
8 to sexual abuse by Jeffrey Epstein can cause  
9 psychological harm?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation. Assumes facts not  
12 in evidence.

13 A. I can only tell you about what I  
14 know of Virginia's lies. She lied  
15 repeatedly, often and I know for a fact she  
16 is a liar so I can only testify to what I  
17 know and the fact that she has lied about me  
18 from the beginning to the end and repeatedly  
19 causes me to question anything that she may  
20 feel.

21 Q. Is it an obvious lie you had sex  
22 toys in Jeffrey Epstein's Palm Beach house?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. Can you repeat the question,

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2 please?

3 Q. Is it an obvious lie that you had  
4 sex toys in Jeffrey Epstein's Palm Beach  
5 house?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. Did Virginia say that?

9 Q. I'm asking you a question.

10 Is it an obvious lie that you had  
11 sex toys in Jeffrey Epstein's house?

12 A. I don't recall any sex toys.

13 Q. If someone said had you sex toys,  
14 would that be an obvious lie?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. Like I said -- can you be more  
18 specific about the house or whatever, what  
19 exactly you are referring to, what's a sex  
20 toy?

21 Q. Yes. How would you define a sex  
22 toy?

23 A. No. I need you to define a sex  
24 toy, I don't have enough knowledge of sex  
25 toys.

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2 Q. I will define it based on the  
3 dictionary's definition, which is an object  
4 or device used to sexually stimulate or  
5 enhance sexual pleasure.

6 A. What's your question, please?

7 Q. The question is, is it an obvious  
8 lie that you had sex toys in Jeffrey  
9 Epstein's Palm Beach house?

10 MR. PAGLIUCA: Same objection.

11 Q. You can answer.

12 A. Like I said, I do not have any  
13 recollection of sex toys in Jeffrey's house.

14 Q. Is it a lie, is it an obvious lie  
15 that you took pictures of nude girls?

16 MR. PAGLIUCA: Object to the form  
17 and foundation.

18 A. We already covered this. Girls we  
19 are not referring to -- I can only testify to  
20 taking pictures of adult people and I already  
21 testified they are not nude, per se. That  
22 every picture that I ever took and which they  
23 were very limited, always by request, the  
24 people would be covered or it would be a hand  
25 or a foot. There was never any pictures that

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2 I took of people would only have been  
3 mainstream type magazine type photos and any  
4 photos I took could have been very happily  
5 and expected to be displayed on your parents'  
6 mantel piece or grandparents' mantel piece.

7 Q. Is it a lie that you approached  
8 females to bring them to Jeffrey Epstein?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. Please ask the question, again.

12 Q. Sure. Is it a lie that you  
13 approached females to bring them to Jeffrey  
14 Epstein?

15 A. I don't know what you are asking  
16 me.

17 Q. I'm asking you, if it's a lie that  
18 you approached females to bring them to  
19 Jeffrey Epstein?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. You are not asking me a good  
23 question, sorry.

24 Q. You don't get to choose the  
25 questions.

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2 A. I would like to answer your  
3 questions but you are not asking me a  
4 question that I can answer.

5 Q. What about that is causing you  
6 pause where you can't answer the question?

7 A. You are trying to trap me and  
8 that's not fair, so I already testified that  
9 I hire people across the board, so I would  
10 hire architects, decorators, pool people,  
11 exercise instructors, gardeners, cooks,  
12 chefs, cleaning people. So I, in the course  
13 of a very long time when I would hire people  
14 I hired people to work for Jeffrey. So I'm  
15 happy to testify to hiring people for every  
16 possible conceivable proper job that you  
17 could conceive of within the context of  
18 Jeffrey's life and homes.

19 Q. Is it a lie that you approached  
20 females to bring them to Jeffrey Epstein for  
21 the purpose of performing massages?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. Again, I have already testified  
25 that part of the job that I had was to hire

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2       lots of different types of people. In terms  
3       of whatever -- very small part of my job,  
4       Jeffrey enjoyed getting massages. I think  
5       that is something we can all agree in this  
6       room and within the context of that, very  
7       infrequently I would go to spas and myself  
8       happily receive a professional nonsexual  
9       massage from a man and/or from a woman and if  
10      that massage was something that I thought was  
11      something that was good, I would ask if that  
12      man or woman would come back and does home  
13      visits. If that person said that they did,  
14      they would sometimes come, from time to time,  
15      not always, come back to the house to perform  
16      a nonsexual professional male or female  
17      massage.

18                Q.     Were any of the exercise  
19      instructors you hired under the age of 18?

20                A.     Again, I don't hire, we've already  
21      established that I don't hire people. I  
22      interview people to see if they are competent  
23      in the job that they do and/or whether they  
24      are someone who seemed that they can do home  
25      visits.



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2 At the point where I think that  
3 there is somebody that has, can be either  
4 whatever the job may be, pool, gardener, chef  
5 and/or exercise instructor and I think they  
6 could be good at whatever it is at whatever  
7 skill that they had and they did a home visit  
8 which would obviously be mandatory and Mr.  
9 Epstein would meet with them and decide if he  
10 wanted to have whatever skill it was that he  
11 would do it and then he would then either  
12 have them come back or hire them.

13 Q. Were there any exercise instructors  
14 that worked at the home that were under the  
15 age of 18?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. Again, I keep coming back to this,  
19 that the people that I employed or -- not the  
20 right word, the people I would meet to come  
21 and work at the house, under any guise  
22 whatsoever, again, from any of the many  
23 positions that I filled, were all over --  
24 were adults.

25 Q. When you say adults, over the age

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2 of 18?

3 A. I think we can establish what adult  
4 would be.

5 Q. You never interviewed or I know you  
6 don't want to use the word hired, whatever  
7 your role was, you brought in an exercise  
8 instructor that was under the age of 18 to  
9 work at the house?

10 MR. PAGLIUCA: Object to the form  
11 and foundation.

12 A. I have already testified that what  
13 I was responsible for was to find people who  
14 had competencies in whatever area I was  
15 looking for. The competencies I was looking  
16 for were professional and adult.

17 Q. So there was no exercise instructor  
18 that worked at the Palm Beach house or the  
19 New York house or the New Mexico house or the  
20 USVI under the age of 18?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. I can only testify to when I was at  
24 the house.

25 Q. Yes.

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2 A. I can only testify to the years  
3 when I was present.

4 Q. Right.

5 A. And I can also only testify to  
6 people I personally either met and/or worked  
7 with and/or invited, to find the correct  
8 word, I don't know what the correct word is,  
9 to come to do exercise or whatever it was at  
10 the house.

11 Of the people that I, male and/or  
12 female that I brought were all appropriate  
13 and age appropriate adults.

14 Q. Over the age of 18?

15 A. We've established them as an adult.

16 Q. You are saying appropriate adults,  
17 so we are clear, you didn't hire or bring in  
18 or know of any exercise instructors that were  
19 under the age of 18 at any of those homes?

20 A. I am also testifying that when I  
21 was present at the house and with the people  
22 that I brought in, were all age appropriate  
23 adults.

24 Q. How do you define age appropriate  
25 adults, is that over the age of 18, can we

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2 agree to that?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 Q. Are they under the age of 18?

6 A. We already established that you can  
7 be a masseuse in Florida at age 17. That  
8 does not make it inappropriate.

9 A. I'm not saying appropriate or  
10 inappropriate. I'm just asking if there were  
11 any exercise instructors that were under the  
12 age of 18.

13 A. I am not aware if anybody was but I  
14 don't want to full out and say you oh she  
15 said, we already established you can be a 17  
16 year old masseuse and have it not be  
17 something that is not appropriate. So when  
18 you say that and then you go, well, you come  
19 back and say something, now we can establish  
20 that Virginia was 17 but you can be a 17 year  
21 old legal masseuse, but I am not aware to  
22 your point.

23 Q. Who were the other 17 year old  
24 masseuses that you were aware of?

25 A. I am not aware of any.

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2 Q. Were there any 16 year year old  
3 masseuse that you are aware of?

4 A. I am not aware.

5 Q. Any 15?

6 A. I just want to be clear. The only  
7 person that I am aware of who claims to have  
8 been a -- we have to -- we established  
9 Virginia now is 17, given she has changed her  
10 age so many times. The only person that I am  
11 aware of that was a masseuse at the time when  
12 I was present in the house was Virginia.

13 Q. Is it an obvious lie that Jeffrey  
14 Epstein had a sexual preference for underage  
15 minors?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. Can you ask the question again?

19 Q. It is it an obvious lie that  
20 Jeffrey Epstein had a sexual preference for  
21 underage minors?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. Can you ask the question again?

25 Q. Is it an obvious lie that Jeffrey

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2 Epstein had a sexual preference for underage  
3 minors?

4 MR. PAGLIUCA: Object to the form  
5 and foundation.

6 A. I cannot testify to what  
7 Jeffrey's --

8 Q. You don't know his preference?

9 A. You handed me a stack of papers  
10 from the police reports and that's what I've  
11 read but I have no knowledge, direct  
12 knowledge, of what you are referencing.

13 Q. So you don't know, you don't know  
14 in your own mind that Jeffrey Epstein had a  
15 sexual preference for underage minors, is  
16 that correct?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 Q. Is that correct?

20 A. Please ask the question again.

21 Q. You don't know in your own mind  
22 that Jeffrey Epstein had a sexual preference  
23 for underage minors?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation. You have to pause,

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2 let me object, answer the question.

3 Listen to her question, pause, I object,  
4 you answer.

5 Q. So you don't know in your own mind  
6 that Jeffrey Epstein had a sexual preference  
7 for underage minors?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 Q. You can answer.

11 A. I cannot tell you what Jeffrey's  
12 story is. I'm not able to.

13 Q. Did Jeffrey Epstein have a scheme  
14 to recruit underage girls to use them for  
15 purposes of sexual massages?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. Can you ask me again, please?

19 Q. Did Jeffrey Epstein have a scheme  
20 to recruit underage girls to recruit them for  
21 sexual massages?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. Can you ask it a different way?

25 Q. Did Jeffrey Epstein have a scheme

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2 to recruit underage girls for sexual  
3 massages?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 Q. If you know.

7 A. I don't know what you are talking  
8 about.

9 Q. Is it an obvious lie that Virginia  
10 Giuffre was a minor the first time she was  
11 taken to Jeffrey Epstein's house?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. So we've already established that  
15 Virginia was 17 and we have established that  
16 her mother brought her to the house and that  
17 she came as a masseuse, age 17, which is  
18 legal in Florida.

19 Q. Would Jeffrey Epstein's assistants  
20 arrange times for underage girls to come to  
21 the house for sexual massages?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. What are you talking about?

25 Q. Sure. Would Jeffrey Epstein's



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2 assistants, I think earlier you mentioned, we  
3 talked about Sarah Kellen who worked in the  
4 role as an assistant or Nadia Marcinkova.  
5 Would Jeffrey Epstein's assistants arrange  
6 times for underage girls to come over the  
7 house for sexual massages?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. Again, I read the police reports so  
11 this is all happening according to the police  
12 reports when I am no longer at the house so I  
13 can't testify to what Jeffrey's assistants  
14 did when this kind of activity as alleged in  
15 the reports.

16 Q. So you don't know?

17 A. No.

18 Q. Would Jeffrey Epstein's assistants,  
19 meaning Sarah Kellen, Nadia Marcinkova or any  
20 other assistant that you are aware of from  
21 the time you worked there take nude  
22 photographs of underage girls?

23 MR. PAGLIUCA: Object to the form  
24 and foundation.

25 A. During what period of time?

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2 Q. During any period of time you  
3 worked, did you observe that?

4 A. I did not observe any such  
5 photographs.

6 Q. Are you aware if they took those  
7 kinds of photos?

8 A. I am not aware.

9 MR. PAGLIUCA: Can we take a  
10 five-minute break.

11 THE VIDEOGRAPHER: It's 2:58 and we  
12 are off the record.

13 (Recess.)

14 THE VIDEOGRAPHER: It's now 3:10.  
15 We're starting disk No. 6 and we are  
16 back on the record.

17 Q. Ms. Maxwell, was it an obvious lie  
18 when Virginia said she was sent to Thailand  
19 by Epstein in September of 2002?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I have no knowledge of Virginia  
23 being sent to Thailand.

24 But may I say something?

25 Q. There is not a question pending

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2 unless you want to clarify something.

3 Did you want to clarify that?

4 A. No, I just wanted to say something.

5 Q. Is it an obvious lie when Virginia  
6 said she was given instructions to maintain  
7 telephone contact with you while she was in  
8 Thailand?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. Can you repeat the question?

12 Q. Is it an obvious lie when Virginia  
13 said she was given instructions to maintain  
14 telephone contact with you when she was in  
15 Thailand?

16 MR. PAGLIUCA: Same objection.

17 A. I have no idea what instructions  
18 Virginia was given, if any, when she went to  
19 Thailand.

20 Q. So you know she went to Thailand?

21 A. I know she claimed she went to  
22 Thailand from having read it but given that  
23 she lied about everything it's hard to know  
24 what is true and not true.

25 Q. Would it make any sense for her to

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2 be in contact with you, would there be any  
3 reason why she needed to be in contact with  
4 you?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. When are we talking about?

8 Q. When she went to Thailand.

9 MR. PAGLIUCA: Same objection.

10 Q. In 2002, would there be any reason  
11 for her to remain in contact with you?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. Can you ask the question again,  
15 please?

16 Q. Would there be any reason for  
17 Virginia to maintain contact with you in 2002  
18 when she went to Thailand?

19 MR. PAGLIUCA: Same objection.

20 A. First of all, I didn't know that  
21 she went to Thailand. I had had nothing to  
22 do with her trip to go to Thailand and there  
23 would absolutely no reason for her to be in  
24 touch with me, whatsoever.

25 Q. Did you ever have a phone number

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2 that was [REDACTED]

3 A. I did.

4 Q. Was that a cell phone number?

5 A. Yes.

6 Q. Is that your current cell phone  
7 number?

8 A. Yes.

9 Q. I'm going to mark a couple of  
10 things here?

11 (Maxwell Exhibit 11, photos, marked  
12 for identification.)

13 THE WITNESS: Can I say something  
14 now?

15 MR. PAGLIUCA: No.

16 THE WITNESS: Will you let me know  
17 when I can?

18 MR. PAGLIUCA: When she asks you a  
19 question:

20 Q. So we've marked this as Exhibit 11.  
21 I'm showing you what's been marked as Exhibit  
22 11 which is Giuffre 003191 and 003192.

23 Can you take a look at that  
24 document for me. Is that number that you  
25 just identified the [REDACTED] as being

1 G Maxwell - Confidential

2 your cell phone number, is that number on  
3 this document?

4 A. It is.

5 Q. And do you know who authored this  
6 document?

7 A. I do not.

8 Q. Who is JoJo?

9 A. I don't know who JoJo is on this  
10 document because I don't know what this  
11 document is.

12 Q. Do you know someone by the name of  
13 JoJo?

14 A. I do know someone by the name of  
15 JoJo.

16 Q. Would he know your phone number?

17 MR. PAGLIUCA: Object to the form.

18 A. I have to idea.

19 Q. Why would Virginia be instructed to  
20 call Ms. Maxwell at your number on this form?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. I don't know what this document is.

24 I don't know when it was done, I don't know  
25 anything about it other than I can see it has

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2 my name and my number on it.

3 Q. So JoJo -- you said JoJo -- is he  
4 employed by Mr. Epstein?

5 A. Again, it is not the only one JoJo  
6 on the planet.

7 Q. I understand.

8 Do you know a JoJo that is employed  
9 by Mr. Epstein?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. Can you ask me the question again?

13 Q. Do you know someone by the name of  
14 JoJo that was employed by Mr. Epstein back in  
15 2002?

16 A. I do know somebody who was employed  
17 by Mr. Epstein known as JoJo.

18 Q. Do you recognize the other numbers  
19 listed at the top of this document?

20 A. I do not.

21 Q. Would you have known JoJo's cell  
22 number at that time in 2002?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. I have no idea.

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2 Q. Can I ask you to turn to the next  
3 page, please.

4 Do you know who Nantimda Tharanese  
5 is who is mentioned on this document?

6 A. I do not.

7 Q. If you look on the bottom lines of  
8 the document, it says, Still in Thailand  
9 during your stay, if she is, she will be  
10 staying at the same hotel.

11 Do you recall ever giving Virginia  
12 instructions to meet a girl in Thailand?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. I have already testified that I  
16 didn't even know that Virginia was going to  
17 Thailand.

18 Q. So you didn't give her instructions  
19 to meet a girl in Thailand?

20 A. Like I said, I didn't even know she  
21 was going to Thailand.

22 Q. Do you know whether Jeffrey Epstein  
23 would have given her instructions to meet a  
24 girl in Thailand?

25 MR. PAGLIUCA: Objection to the



1 G Maxwell - Confidential

2 form and foundation.

3 A. I cannot possibly tell you what  
4 Jeffrey did or didn't do. I wouldn't know.

5 Q. Do you know whether Jeffrey Epstein  
6 paid for Virginia to go to Thailand?

7 A. Again, I wouldn't know if he did.  
8 (Maxwell Exhibit 12, documents,  
9 marked for identification)

10 Q. I'm going to direct -- you can take  
11 a look at it and then I'm going to direct  
12 your attention to a couple of pages.

13 MR. PAGLIUCA: So the record should  
14 be clear, this exhibit which is 12 is  
15 375, 6, 7, 8, 9, 80, 1, and then skips  
16 to 919, 920, 921, 922, 923, 924, 925 and  
17 926.

18 Q. So I'm going to direct your  
19 attention to the first page, have you ever  
20 traveled with Jeffrey Epstein where you've  
21 received a document like this from Shoppers  
22 Travel in your own independent travel.

23 Do you recognize this?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 Q. The front form, the front page, do  
3 you recognize this Shopper Travel form, have  
4 you ever used them as a travel agent with  
5 Jeffrey Epstein?

6 MR. PAGLIUCA: Same objection.

7 Q. You can answer.

8 A. I don't recognize this.

9 Q. Turning to the second page which is  
10 the 00376, do you see at the top of that  
11 document where it says Jeffrey Epstein, J.  
12 Epstein 457 Madison Avenue 4th floor New York  
13 New York.

14 Is that an address you are familiar  
15 with that is Jeffrey Epstein's?

16 A. I am.

17 Q. Do you see below that, travel on  
18 Singapore Airlines, and you are going to have  
19 to go from New York JFK to Singapore Bangkok.

20 Do you see that?

21 MR. PAGLIUCA: What?

22 Q. The first entry is going to be on  
23 September 27, New York.

24 MR. PAGLIUCA: I see it.

25 MS. McCAWLEY: I'm not talking to

1 G Maxwell - Confidential

2 you. I'm talking to the witness.

3 A. I see it.

4 Q. To Singapore Bangkok?

5 A. Singapore Bangkok I'm afraid are  
6 not the same place.

7 Q. Singapore, then Bangkok:

8 Q. I'm going to turn you to page  
9 Giuffre, it's a little further back 000919.  
10 And do you see at the top where it says J.  
11 Epstein, underneath, Royal Princess, change  
12 mine?

13 A. I do.

14 Q. Does this refresh your recollection  
15 that Virginia Roberts' trip to Thailand was  
16 paid for by Jeffrey Epstein?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I can only testify to the piece of  
20 paper you showed me that has that  
21 information. I cannot testify from direct  
22 memory.

23 Q. When Virginia was traveling to  
24 Thailand, which the dates, again, I'm going  
25 to refer you back to the first page so you

1 G Maxwell - Confidential

2 can see the dates.

3 MR. PAGLIUCA: Can you identify a  
4 Bates number, please.

5 Q. [REDACTED] which was at the top says,  
6 [REDACTED] I'm going to refer you,  
7 at the same time, to the flight logs which  
8 were marked, the thicker document that looks  
9 like this with all the log entries on it.  
10 I'm going to refer you to page --

11 MR. PAGLIUCA: That's Exhibit No.  
12 6, correct? I'm trying to keep the  
13 record straight.

14 MS. McCAWLEY: I don't have Exhibit  
15 numbers on mine. That's Giuffre [REDACTED]

16 MR. PAGLIUCA: Hang on one second.

17 A. Can you repeat the number please.

18 Q. [REDACTED] And if you will look on  
19 that page at the entry, under [REDACTED]  
20 [REDACTED] starting with the [REDACTED] and then it runs  
21 down to the, looks like the [REDACTED] that first  
22 entry has President Clinton, Kevin Spacey,  
23 Chris Tucker, Jeffrey Epstein and the  
24 initials GM.

25 Do you remember taking a trip with

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2 President Clinton during [REDACTED]

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. Can you repeat the question,  
6 please?

7 Q. Do you remember taking a trip with  
8 President Clinton during [REDACTED]  
9 that's the [REDACTED] it looks like, through the  
10 [REDACTED]

11 A. I don't remember the dates. I  
12 couldn't testify to when we actually did it  
13 but I do remember the trip itself.

14 Q. So you were traveling with Jeffrey  
15 Epstein and President Clinton at the same  
16 time Virginia was headed to Thailand, is that  
17 correct?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. I don't know, is that right?

21 Q. If you look at [REDACTED] on the  
22 document that I gave you, the first document  
23 and then you referred to, if you look in the  
24 same as above lines, you will see the travel  
25 group with President Clinton?

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2 MR. PAGLIUCA: Are you asking her  
3 to compare the documents or are you  
4 asking her what her personal knowledge  
5 is.

6 MS. McCAWLEY: I'm asking if she can  
7 look at the doubts and tell me if she  
8 recalls that she traveling with  
9 President Clinton at the same time this  
10 document reflects Virginia was in  
11 Thailand.

12 A. I can't testify to any dates. I  
13 couldn't tell you. I can see a date and I  
14 can see a date but I can't tell you that I  
15 have a memory of the dates. I have a memory  
16 of the trip, I don't have a memory of the  
17 time.

18 Q. Who is [REDACTED]?

19 A. [REDACTED].

20 Q. What is her address?

21 A. I don't know.

22 Q. Does she live in the United States?

23 A. She does.

24 Q. In what state?

25 A. I believe in New Jersey somewhere.

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2 Q. Do you have her phone number?

3 A. Not memorized.

4 Q. Do you have the ability to get her  
5 phone number?

6 A. Of course.

7 Q. Has she ever asked -- has [REDACTED]  
8 [REDACTED] ever asked other girls to come over to  
9 see Jeffrey Epstein for the purpose of a  
10 sexual massage?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. Can you ask the question again  
14 please.

15 Q. Has [REDACTED] ever asked girls to  
16 come over to see Jeffrey Epstein for the  
17 purpose of a sexual massage?

18 MR. PAGLIUCA: Object to form and  
19 foundation.

20 A. Can you ask again, please?

21 Q. Has [REDACTED] ever asked girls to  
22 come over to see Jeffrey Epstein for the  
23 purpose of sexual massage?

24 A. I have no personal knowledge.

25 Q. What does [REDACTED] do for you?

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2 A. She helps with my not-for-profit  
3 ocean foundation and any other related  
4 activities that I may have.

5 Q. Is she paid for by Jeffrey Epstein?

6 A. No.

7 Q. She is paid for by you?

8 A. Yes.

9 Q. When did you first meet [REDACTED]

10 [REDACTED]

11 A. I don't recollect exactly, sometime  
12 maybe 2002, 2003.

13 Q. How did you meet her?

14 A. I don't recollect exactly how we  
15 met.

16 Q. Did Jeffrey introduce you to her?

17 A. I don't recollect how we met.

18 Q. Does she know Jeffrey Epstein?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. Can you ask again, please?

22 Q. Does [REDACTED] know Jeffrey  
23 Epstein?

24 A. What do you mean by know?

25 Q. Has she met her him before?



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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I can't recollect a time when  
5 [REDACTED] -- I've seen [REDACTED] with Jeffrey but --

6 Q. You are not sure --

7 A. I know they know either other. I  
8 can't testify to a meeting between them.

9 Q. Do you know where in New Jersey she  
10 lives?

11 A. No

12 Q. You don't know a city?

13 A. No.

14 Q. How long has she worked for you?

15 A. Sometime 2002, 2003.

16 Q. To the present?

17 A. Yeah.

18 Q. Why do you think that [REDACTED]  
19 might know Jeffrey?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. Because you know, I know Jeffrey.

23 Q. Have you seen them together?

24 A. I already testified I have not seen  
25 them together, to my recollection.

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2 Q. Is it your testimony that [REDACTED]  
3 [REDACTED] knows Jeffrey Epstein through the work  
4 that she does for you?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. I don't recollect, and I don't  
8 recollect how I met [REDACTED] and I can't testify  
9 to what [REDACTED] relationship is or is not with  
10 Jeffrey.

11 Q. Have you ever talked to Jeffrey  
12 about [REDACTED]

13 A. I don't know what you mean.

14 Q. In any way, have you ever had a  
15 conversation with Jeffrey about [REDACTED]?

16 A. In what context.

17 Q. In any context. Have you ever  
18 talked to Jeffrey Epstein about [REDACTED]?

19 A. [REDACTED] works for me so it's entirely  
20 possible that in the course of conversations  
21 since 2002, 2003 that a conversation in which  
22 [REDACTED] name would have come up is entirely  
23 possible.

24 Q. I provided you with and I'm sorry,  
25 I don't know all the numbers, but the

1 G Maxwell - Confidential  
2 statement that was issued by Ross Gow that  
3 should be a single page still in your stack  
4 of exhibits there.

5 MR. PAGLIUCA: Exhibit 10.

6 Q. Did you authorize Ross Gow to issue  
7 that statement on your behalf in January of  
8 2015?

9 A. I already testified that that was  
10 done by my lawyers.

11 Q. So did you authorize your lawyers  
12 to issue a statement on your behalf through  
13 Ross Gow in January of 2015?

14 A. It was determined that I had to  
15 make a statement in the United Kingdom  
16 because of the appalling lies and I just  
17 thought of some new ones.

18 Virginia's statement that I  
19 celebrated her 16 birthday with her. We can  
20 all agree that that's entirely impossible. I  
21 didn't meet her until she was 17 and other  
22 lies she perpetrated that she had a diary and  
23 we all know is a complete fake. That's not a  
24 diary. It was just a book she was writing  
25 that you helped sell to the press, as if it

1                   G Maxwell - Confidential  
2           was a diary, when it was just a story that  
3           she is writing of fiction, fictional story  
4           for money.

5           Q.     How did you arrive at the words  
6           that were put in that statement?

7                   MR. PAGLIUCA:  I'm going to object  
8           and instruct you to the extent this  
9           calls for any privileged communications  
10          between yourself and Mr. Barden or  
11          another lawyer representing you, we're  
12          asserting privilege.  If you can answer  
13          that without that, feel free to answer.

14          Q.     So what your counsel is saying, and  
15          I will exclude any privileged communications  
16          you had with your lawyers.

17                   The question is, how did you arrive  
18          at the words that were put in that statement,  
19          if you can tell me without disclosing  
20          privileged communications?

21          A.     I'm not sure that I can.

22          Q.     Is the statement that you issued  
23          true?

24          A.     What do you mean by that?

25          Q.     Is the statement that you issued,

1 G Maxwell - Confidential

2 the statement that's in front of you, is it a  
3 true statement?

4 A. As in that Virginia is a liar?

5 Q. The words you put in there, is that  
6 true?

7 A. Of course they're true.

8 Q. When did you become aware that the  
9 statement was being released?

10 A. I don't recollect exactly.

11 Q. What day it was?

12 A. No.

13 Q. I'm sorry. Did you identify, I  
14 might not have caught it, did you identify  
15 the name of the lawyer that you said you  
16 retained for purposes of this statement?

17 A. I think Philip Barden.

18 Q. Did you pay that lawyer Philip  
19 Barden?

20 A. Yes.

21 Q. Are you aware of any interstate or  
22 international transportation of a woman aged  
23 18 to 28 for the purposes of prostitution?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. I'm not sure I even understand your  
3 question.

4 Q. I will go slower.

5 Are you aware of any interstate,  
6 meaning between states, or international,  
7 meaning oversees transportation, of women  
8 aged 18 to 28, for the purposes of  
9 prostitution?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. Are you asking -- I'm still not  
13 sure I understand the question.

14 Q. I will try to make it clearer.

15 I'm asking you if you are aware of  
16 any interstate, meaning between states, or  
17 international transportation, meaning by  
18 flight or by car or by train, of women aged  
19 18 to 28, their ages are between the ages of  
20 18 and 28, for the purposes of prostitution?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. In the world I'm sure that that  
24 happens, I read about it all the time.

25 Q. Not in the world. Are you aware of

1                   G Maxwell - Confidential  
2           it, in your experience with Jeffrey Epstein,  
3           of any interstate or international  
4           transportation of women aged 18 to 28, for  
5           the purposes of prostitution?

6                   MR. PAGLIUCA: Objection to the  
7                   form and foundation.

8           A.     So whilst I appreciate this might  
9           not seem like a smart question, what do you  
10          mean by prostitution, what are you asking me  
11          exactly?

12          Q.     That would be sex for hire, any  
13          kind of sexual act that's paid for.

14                  MR. PAGLIUCA: Objection to the  
15                  form and foundation.

16          A.     Who's paying, what are you asking  
17          me.

18          Q.     It can be paid for by anybody.  
19          It's a sexual act that's paid for.

20                  I'm asking if you are aware of any  
21          interstate or international transportation of  
22          women aged 18 to 28, for the purposes of  
23          prostitution?

24                  MR. PAGLIUCA: Objection to the  
25                  form and foundation.

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2 A. I have no idea what you are talking  
3 about.

4 Q. So you are not aware of that?

5 A. No.

6 Q. Are you aware of any interstate or  
7 international transportation of women, aged  
8 18 to 28, for the purposes of having sex with  
9 Epstein where they would receive compensation  
10 of any type?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I don't know what you are referring  
14 to.

15 Q. Do you want me to repeat the  
16 question?

17 A. Sure, go ahead.

18 Q. Are you aware of any interstate or  
19 international transportation of woman, aged  
20 18 to 28, for the purpose of having sex with  
21 Jeffrey Epstein where they would receive  
22 compensation of any type?

23 MR. PAGLIUCA: Objection to form  
24 and foundation.

25 A. I am not aware of what you are



1 G Maxwell - Confidential

2 talking about.

3 Q. Are you aware of any interstate or  
4 international transportation of women, aged  
5 18 to 28, for the purposes of providing a  
6 massage for Jeffrey Epstein?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. So I you need to repeat that  
10 question for me.

11 Q. Sure.

12 Are you aware of any interstate,  
13 meaning between states, or international,  
14 oversees, transportation of women, aged 18 to  
15 28, for the purposes of providing massage for  
16 Jeffrey Epstein?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I think we can agree he did travel  
20 from time to time with a professional adult  
21 masseuse.

22 Q. Are you aware of any interstate or  
23 international transportation of women, aged  
24 18 to 28, for the purposes of providing a  
25 massage to any person other than Jeffrey

1 G Maxwell - Confidential  
2 Epstein?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. Again, I'm not aware of anybody  
6 that, if you are asking for specifics to  
7 someone else, I have no knowledge of that.

8 Q. So you are not aware of any  
9 interstate or international transportation of  
10 a woman aged 18 to 28 for the purposes of  
11 providing a massage to any person other than  
12 Jeffrey Epstein?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. I don't recall what any single  
16 person being on a plane for a massage with  
17 someone else other than Jeffrey, for the sole  
18 purpose, if that's the question, I don't have  
19 any recollection of that.

20 Q. Earlier in your testimony, you  
21 stated that Virginia Roberts was 17 at the  
22 time you met her.

23 How do you know she was 17?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation. And to the extent

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2 that calls for a privileged response,  
3 I'm instructing you not to answer.

4 Q. How do you know Virginia Roberts  
5 was 17 at the time you met her?

6 MR. PAGLIUCA: Again, if you  
7 learned that information from your  
8 lawyer, I'm instructing you not to  
9 answer.

10 A. I will follow my counsel's advice.

11 Q. Are you able to answer that  
12 question without telling me information you  
13 learned from a lawyer?

14 A. I'm not.

15 Q. So you don't have independent  
16 knowledge that Virginia, according to your  
17 statement, was 17 at the time you met her?

18 A. Again, my lawyer has instructed me  
19 not to answer.

20 Q. I'm asking you a different  
21 question. Whether you have any independent  
22 knowledge, outside your lawyers, that  
23 Virginia was 17 at the time you met her?

24 A. Following the instructions of my  
25 lawyers, I can only remember or testify to

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2 what she --

3 MR. PAGLIUCA: She is asking you a  
4 different question. She is asking other  
5 than what your lawyers have told you, do  
6 you have any knowledge about her being  
7 17, that's what she is asking.

8 A. I can't recollect where I got all  
9 the information that I have that definitively  
10 shows that.

11 Q. Earlier in your testimony, I  
12 believe you said all of us would know that  
13 Virginia was 17 at the time you met her.

14 How would we know that?

15 A. I think you know that by her own  
16 dates, now that it was in 2000, so her entire  
17 trail of me celebrating her 16th birthday is  
18 clearly another giant falsehood.

19 Q. But she was 16 and 17 that year,  
20 wasn't she?

21 A. Which year?

22 Q. You said it was 2000.

23 A. I think the information that I have  
24 that indicates that definitively was  
25 something that is privileged, so I can't

1 G Maxwell - Confidential

2 share with you.

3 Q. So you have privileged information  
4 that definitively tells you that she was 17  
5 at the time you met her?

6 A. I believe I do.

7 Q. How would we know that?

8 A. What are you asking me?

9 Q. Earlier today you testified that we  
10 would know that she was 17 at the time that  
11 you met her.

12 How would we know that?

13 A. I imagine you have access to  
14 exactly the same information that I do.

15 Q. What is that information?

16 A. Again, it's privileged, I can't  
17 share it with you but you have been on this  
18 case for, I don't know, much much longer than  
19 I have and I imagine you have all the  
20 information that I do.

21 Q. Do you know whether your lawyers  
22 have produced documents from you that would  
23 show the age that Virginia was at the time  
24 that you met her?

25 MR. PAGLIUCA: To the extent that

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2 calls for a communication that you had  
3 with one of your lawyers, I'm  
4 instructing you not to answer that  
5 question.

6 Q. I assume you, as part of the  
7 discovery process, had to collect documents  
8 that were relevant to this action, is that  
9 correct?

10 A. I did.

11 Q. Did you collect documents that  
12 would show that Virginia was 17 at the time  
13 that you met her?

14 A. I think you have everything that  
15 relates, that I had, contemporaneously per  
16 what you asked for that I have that relates  
17 to that.

18 Q. Did you have a document that  
19 identified that Virginia was 17 at the time  
20 that you met her?

21 A. You have all of the documents that  
22 I had.

23 Q. I'm not asking what documents. I'm  
24 asking, do you have a document that  
25 identifies Virginia being 17 at the time you

1 G Maxwell - Confidential

2 met her?

3 A. You have every document that I  
4 have. You have seen every document that I  
5 have.

6 Q. That's not what I'm asking.

7 A. I don't recall every document that  
8 I gave you, so I don't know. I would have to  
9 look at every single document I gave you and  
10 then review it but as I recall you have every  
11 document that I have.

12 Q. What are you planning to show the  
13 jury that will prove that Virginia was 17  
14 when you met her?

15 A. Again that's privileged so I can't  
16 share that with you.

17 Q. If you're showing the jury, it  
18 wouldn't be privileged, so is there a  
19 document you have produced in this matter  
20 that shows that Virginia was 17 at the time  
21 you met her?

22 MR. PAGLIUCA: She answered that  
23 question already. She said she doesn't  
24 know, she has given you everything. If  
25 there is a decision -- assuming for the

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2 moment there is such a document, just  
3 hypothetically, and assuming for the  
4 moment that it is going to get produced  
5 somewhere, if it hasn't already been  
6 produced, obviously that would involve a  
7 waiver, a future waiver of the  
8 privilege. I think that's the answer to  
9 the question.

10 Q. Has the document been produced, do  
11 you know?

12 A. You have everything that I have  
13 given you, so if you can't -- if it's not in  
14 those documents, I don't know what to tell  
15 you.

16 Q. Your lawyers haven't withheld any  
17 documents?

18 A. They are right here. You can ask  
19 them.

20 Q. I'm asking you.

21 A. I don't know what -- they're  
22 lawyers.

23 Q. When we were talking earlier about  
24 Prince Andrew, I asked you whether you had  
25 ever given him a gift of a puppet.



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2 Did you ever, not as a gift, did  
3 you ever see in the presence of Prince Andrew  
4 a puppet?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. Can you be more direct, please?

8 Q. Sure. Were you ever in a room with  
9 Prince Andrew where there was a puppet?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. Can you be more specific please and  
13 can you bound it by time and be more  
14 specific, whatever you are actually asking  
15 me?

16 Q. Were you ever in a room with Prince  
17 Andrew in New York in Jeffrey Epstein's home  
18 where there was a puppet?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. What sort of puppet are you asking  
22 me?

23 Q. Any kind of puppet?

24 A. You need to be more descriptive. I  
25 don't know what you mean by puppet, there is

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2 hand puppets, all sorts of puppets.

3 Q. Is there any puppet you've ever  
4 seen in Jeffrey Epstein's home in the  
5 presence of Prince Andrew?

6 A. Again, puppet, you know, there is  
7 lots of types of puppets.

8 Q. Any type of puppet.

9 A. If you want to give me a  
10 description of the puppet, I would be perhaps  
11 be able to say.

12 Q. Any type of puppet?

13 A. Can you be more detailed?

14 Q. Have you ever seen a puppet in  
15 Jeffrey Epstein's home in the presence of  
16 Prince Andrew?

17 A. My understanding of a puppet is a  
18 small handheld item you have in a circus. I  
19 have never seen that.

20 Q. Have you ever seen a puppet which  
21 is defined as a movable model of a person or  
22 animal that is used in entertainment and  
23 typically moved either by strings or  
24 controlled from above or by a hand inside it?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I have not seen a puppet that fits  
4 exactly that description.

5 Q. Have you seen any puppet that fits  
6 any description?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. Can you reask the question, please?

10 Q. Yes.

11 Have you seen any puppet that fits  
12 any description in the presence of Prince  
13 Andrew in Jeffrey Epstein's home?

14 MR. PAGLIUCA: Objection to the  
15 form and foundation.

16 A. I am not aware of any small  
17 handheld puppet that was there. There was a  
18 puppet -- not a puppet -- there was a -- I  
19 don't know how would you describe it really,  
20 I don't know how would you describe it. Not  
21 a puppet, I don't know how you would describe  
22 it. A caricature of Prince Andrew that was  
23 in Jeffrey's home.

24 Q. Did you use that caricature to put  
25 the hand of the caricature on Johanna

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2 Sjoberg's breast?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. I don't recollect. I recollect the  
6 puppet but I don't recollect anything around  
7 the puppet. You characterized puppet, I  
8 characterize it as, I don't know, as a  
9 characterization of Andrew.

10 Q. Do you recollect asking Virginia  
11 Roberts to sit on Prince Andrew's lap with  
12 the caricature of Prince Andrew?

13 A. I do not recollect that.

14 Q. What do you remember about the  
15 caricature of the Prince Andrew caricature  
16 when you were in the presence of Prince  
17 Andrew, Virginia Roberts and Johanna Sjoberg?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. I don't recollect the story as told  
21 by Johanna or Virginia. I don't even know  
22 who -- I remember the caricature of Prince  
23 Andrew and I remember Prince Andrew but I  
24 don't recall anything else around the  
25 caricature.

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2 Q. Did you give it to him?

3 A. I did not.

4 Q. Who gave it to him?

5 A. I don't think it was given to him  
6 at all.

7 Q. Did he bring it?

8 A. No.

9 Q. Was it something that was at the  
10 house?

11 A. As best I recollect.

12 Q. Was it something that you saw at  
13 the house in advance of Prince Andrew's  
14 arrival?

15 A. Again, I don't real -- I recollect  
16 the caricature, I recollect Prince Andrew, I  
17 don't recollect much else around the  
18 caricature.

19 Q. Was there a party going on in the  
20 house at the time you recollect the  
21 caricature?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. You have to be way more specific?

25 Q. Do you remember, you said you

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2 recollect this caricature, you recollect  
3 Prince Andrew being there. Do you recollect  
4 a party going on at the time of that  
5 interaction with Prince Andrew and the  
6 caricature?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I don't recollect a party -- first  
10 of all, they weren't really parties -- I  
11 don't recollect a party -- I don't know what  
12 you mean by party in the context of that  
13 scenario.

14 Q. Who do you recollect being at the  
15 home during the time Prince Andrew was there  
16 with this caricature?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I only recollect myself with Prince  
20 Andrew, I don't recollect anybody else.

21 Q. You don't recollect Jeffrey Epstein  
22 being there?

23 A. Actually, no.

24 Q. You don't recollect Johanna Sjoberg  
25 being there?

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2 A. No.

3 Q. You don't recollect Virginia  
4 Roberts being there?

5 A. No.

6 Q. It was just you and Prince Andrew?

7 A. I am not saying it was just me and  
8 Prince Andrew, you are asking me do you  
9 remember. I only remember Prince Andrew, I  
10 remember Prince Andrew and the caricature but  
11 I can't place the caricature and everybody  
12 else in the same context, the same timeframe  
13 you are asking me.

14 Q. Would Prince Andrew typically  
15 travel with Secret Service or some sort of  
16 security when he would come to visit you and  
17 Jeffrey in New York?

18 A. Typically he would have somebody.

19 Q. Would they be in the house or  
20 outside of the house? Would they usually  
21 stay in the house or outside of the house, in  
22 other words guarding the doors or would they  
23 come inside?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. Typically, there is no typical  
3 because there is no standard procedure, so I  
4 can't comment or testify to what secret  
5 service would or wouldn't do.

6 Q. Do you remember them being in the  
7 house?

8 A. Not specifically.

9 Do you mind if I take a bathroom  
10 break.

11 THE VIDEOGRAPHER: It's now 3:51  
12 and we are off the record.

13 (Recess.)

14 THE VIDEOGRAPHER: It's now 4:04.  
15 We are back on the record and we're  
16 starting disk No. 7.

17 Q. Ms. Maxwell, during what time  
18 period, I know you said, I believe you said  
19 you met Jeffrey in 1991, if I'm correct there  
20 and you've known him through the present.

21 During what time period within  
22 those years would you say your relationship  
23 was the closest with Jeffrey?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.



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2 A. What do you mean by close, sorry.

3 Q. I think earlier today you testified  
4 that at some point in time you considered  
5 yourself to be his girlfriend, is that the  
6 closest you would say that your relationship  
7 was with him and if so, what time period was  
8 that?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I don't think I said I was his  
12 girlfriend, I would like to think of myself  
13 as maybe, I don't think I -- sometime in the  
14 mid '90s.

15 Q. How close was your relationship?

16 A. We were very friendly.

17 Q. Without going into details, was  
18 your relationship with him intimate?

19 A. Yes.

20 Q. When was the last time you had  
21 contact with Jeffrey Epstein?

22 A. What do you mean by contact.

23 Q. Either a phone call or email or  
24 anything of that nature?

25 A. As best as I can recollect when

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2 all -- sometime last year.

3 Q. So you haven't talked to him like,  
4 for example, last week you didn't talk to  
5 him?

6 A. I did not.

7 Q. How many times have you had either  
8 direct or indirect, meaning, in the presence  
9 of him or calling or emailing, contact with  
10 Jeffrey Epstein from December 30, 2014 until  
11 now?

12 A. I'm sorry, can you just --

13 Q. Either in person or by phone or by  
14 email, from December 30, 2014 until present.

15 A. I can't really characterize that  
16 but not very much. There was a period when  
17 in January when you filed your, whatever you  
18 filed, where we spoke and then, since then  
19 not much at all.

20 Q. Can you estimate how many emails  
21 you would have sent Jeffrey from the period  
22 of December 30, 2014 to the present?

23 A. Not very many at all.

24 Q. More than 20?

25 A. I really wouldn't be able to

1 G Maxwell - Confidential

2 characterize it because it wouldn't be that  
3 many. I wouldn't know.

4 Q. More than 50?

5 A. It would be on the lesser side, not  
6 on the more side.

7 Q. Can you give me a number?

8 A. I honestly couldn't. I would be  
9 guessing.

10 Q. How many emails has Jeffrey sent  
11 you from the period December 30, 2014 to the  
12 present?

13 A. I would say less emails, even less  
14 emails than I sent him.

15 Q. More than 20?

16 A. I would say on the lesser side.

17 Q. Less meaning 10?

18 A. I really can't recall, very little.

19 Q. When you spoke with Jeffrey in  
20 January of 2015, what did he say to you?

21 A. I really couldn't remember exactly  
22 what he said to me.

23 Q. Did you talk about Virginia  
24 Roberts?

25 A. I'm sure we did but I couldn't

1 G Maxwell - Confidential

2 recall the exact conversation.

3 Q. Does Jeffrey Epstein send you text  
4 messages?

5 A. No.

6 Q. Do you send him text messages?

7 A. No.

8 Q. How many phone calls have you had  
9 with Jeffrey Epstein since December 30, 2014?

10 A. Again, very few.

11 Q. More than five?

12 A. Probably as many as the few emails  
13 that I would characterize, so just very few.  
14 I mean a small number.

15 Q. Are you aware of any disagreement  
16 between your views about Virginia Roberts and  
17 Jeffrey's views about Virginia Roberts?

18 MR. PAGLIUCA: Object to the form  
19 and foundation

20 A. I cannot speculate to his views. I  
21 can only testify on my views.

22 Q. Earlier you went through the series  
23 of lies. Have you talked to Jeffrey about  
24 the lies and does he agree with you?

25 A. I have discussed some of the issues

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2 with him, I can't remember specifically which  
3 ones. I just don't recall. I'm sorry.

4 Q. Do you recall him telling you that  
5 he didn't agree with you on any of those?

6 A. I don't recall him saying that.

7 Q. Do you have a joint defense  
8 agreement with Jeffrey Epstein?

9 A. I believe I do.

10 Q. Do you have a joint defense  
11 agreement with Alan Dershowitz?

12 A. I don't believe I do.

13 Q. Earlier today in your testimony,  
14 when I was asking you some questions, you  
15 said that you couldn't answer but that  
16 Jeffrey Epstein could answer that question.

17 Would Jeffrey Epstein be in a  
18 position to confirm or deny some of the  
19 obvious lies that we've discussed today?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I can't possibly testify to what  
23 Jeffrey could or would say. I can't speak  
24 for him.

25 Q. Would Jeffrey be able to confirm or

1 G Maxwell - Confidential

2 deny whether he had sex with Virginia  
3 Roberts?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I can't say what Jeffrey would say.

7 Q. Has he discussed that with you?

8 A. He has not.

9 Q. Would Jeffrey be able to confirm or  
10 deny whether he had a sexual massage from  
11 Virginia that first time she came to his  
12 mansion in Palm Beach?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. I cannot speak for what he would  
16 say. I can only speak for what I would say.  
17 So as I testified everything that she said  
18 about that first meeting didn't happen so...

19 Q. Has he told that you everything  
20 about that first meeting didn't happen?

21 A. I know it didn't happen because she  
22 put me in that room.

23 Q. I understand you know. But has  
24 Jeffrey said when you are talking about the  
25 obvious lies, oh yeah, that never happened?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I can't specifically recall that.  
5 I don't know, but he has to agree with me  
6 because it didn't happen.

7 Q. Can Jeffrey Epstein, would he be  
8 able to confirm or deny whether he had sex  
9 with underage girls?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. I can't testify to what Jeffrey  
13 would say.

14 Q. Can Jeffrey confirm or deny whether  
15 Bill Clinton was on Jeffrey's island?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. I can't say what Jeffrey would say.  
19 I can only say what I know to be true.

20 Q. Has Jeffrey talked to you about the  
21 fact whether Bill Clinton was on his island?

22 A. As best as I can recollect, he said  
23 he was not on the island. As best as I can  
24 recollect.

25 Q. Can Jeffrey Epstein confirm whether

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2 he and Virginia Roberts were together in the  
3 presence of Prince Andrew?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I can't speak to what Jeffrey would  
7 say.

8 Q. Has he talked to about Virginia  
9 Roberts' statement that she was in the  
10 presence of Prince Andrew?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I have not discussed individual  
14 presences with Virginia. That's not -- I'm  
15 only concerned with what I know to be the  
16 stuff about me. So my focus has always been  
17 the lies and the obvious lies as something I  
18 can personally attest to. I cannot possibly  
19 talk for anything else.

20 Q. Has Jeffrey Epstein said to you  
21 anything along the lines of Virginia is lying  
22 when she says she met Prince Andrew?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. Again, I'm not talking about what



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2 she says as regards to other people. I can  
3 talk to things as regards to me.

4 Q. I'm asking if Jeffrey ever said  
5 that to you?

6 A. I don't recollect specific  
7 conversations along those things.

8 Q. You don't recollect him saying that  
9 to you?

10 A. I don't recollect him saying to me  
11 that Virginia didn't meet Prince Andrew. I'm  
12 sure that wouldn't be a conversation that we  
13 would have. It doesn't effect me whether --  
14 so I'm really only concerned about the lies  
15 that were told as regards to me.

16 Q. Can Jeffrey Epstein confirm or deny  
17 whether you sent Virginia to give Glenn Dubin  
18 a massage?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I can't say what Jeffrey would say,  
22 I can tell you I didn't. I can't tell you  
23 what anybody else.

24 Q. Have you discussed with him  
25 Virginia's allegation that she gave Glenn

1 G Maxwell - Confidential

2 Dubin a massage?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. I didn't know that she did say  
6 that.

7 Q. Do you know whether Jeffrey Epstein  
8 has ever sent anybody to Glenn Dubin to  
9 perform a massage for him?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. I couldn't possibly recollect  
13 whether he did anything like that.

14 Q. Did you ever send anybody, not  
15 Virginia, anybody else over to Glenn Dubin's  
16 home for a massage?

17 A. Not to the best of my knowledge.

18 Q. Do you know one of Alexander  
19 Dixon's friend by the name of Anuska  
20 DiGeorgio?

21 A. I do recollect a person of that  
22 name.

23 Q. How do you know her?

24 A. I don't recollect.

25 Q. Did you meet her through Jeffrey?

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2 A. I don't recollect.

3 Q. Do you recall when you met her?

4 A. I do not recollect.

5 Q. How many times have you seen Anuska  
6 DiGeorgio in your life?

7 A. The only reason I remember is  
8 because it's an unusual name but I couldn't  
9 tell you anything else.

10 Q. You didn't see her on a regular  
11 basis, she wasn't one of your friends?

12 A. No.

13 Q. Was Anuska DiGeorgio a masseuse?

14 A. Not to my knowledge.

15 Q. Do you have knowledge of whether  
16 she had a sexual relationship with Jeffrey  
17 Epstein?

18 A. I have no knowledge of that.

19 Q. When was the last time you spoke  
20 with her?

21 A. A very long -- I have no idea.

22 Q. Would it be years?

23 A. Yes.

24 Q. What do you remember about Anuska  
25 DiGeorgio?

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2 A. Nothing really.

3 Q. Do you remember what she looks  
4 like?

5 A. I would just be speculating on how  
6 I remember. I couldn't describe her.

7 Q. Do you recall traveling with her?

8 A. I don't.

9 Q. Did you ever go to her home?

10 A. I don't believe I did.

11 Q. Do you know where she lives?

12 A. I don't.

13 Q. Would you have met her through  
14 Jeffrey Epstein?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. I already testified I don't  
18 recollect how I met her and I remember her  
19 because her name is very unusual.

20 Q. So what's your -- what recollection  
21 do you have of her, do you have a specific  
22 recollection of meeting her somewhere, you  
23 just don't know when that was or how do you  
24 know that name Anuska DiGeorgio?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I don't know why the name is -- I'm  
4 sorry -- I can't -- I have no idea. I  
5 recognize the name but that's it.

6 Q. Was Johanna Sjoberg a masseuse?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. What are you asking me, I'm sorry?

10 Q. When Johanna Sjoberg worked for  
11 Jeffrey Epstein, did she perform massages?

12 A. I've testified that when Johanna  
13 came originally, she came to answer  
14 telephones. I believe at some point she  
15 became a masseuse. I don't recollect when  
16 and I personally had massages from Johanna.

17 Q. What did Johanna do for Jeffrey  
18 Epstein, did she perform massages, anything  
19 else?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. When she came she answered phones  
23 and at some point, I believe, I don't have  
24 any firm recollection, but I believe she went  
25 to school and became a masseuse and I had

1 G Maxwell - Confidential

2 messages from her.

3 Q. Did you ever have any sexual  
4 interaction with her?

5 MR. PAGLIUCA: Object to the form  
6 and foundation and I'm going to instruct  
7 you if we're talking about any  
8 consensual adult contact, you are not  
9 allowed to answer the question.

10 Q. Did you have any sexual contact  
11 with her in the presence of Jeffrey Epstein?

12 MR. PAGLIUCA: Same instruction.

13 Q. Did you have any sexual contact  
14 with her in the presence of anybody other  
15 than Jeffrey Epstein?

16 MR. PAGLIUCA: Same instruction.

17 Q. How many messages did you receive  
18 from Johanna?

19 A. I really don't recall but a fair  
20 amount.

21 Q. Did the messages involve sex?

22 MR. PAGLIUCA: I'm going to  
23 instruct you not to answer.

24 Q. Have you ever engaged in sex with  
25 any female?

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2 MR. PAGLIUCA: I'm going to  
3 instruct you not to answer.

4 MS. McCAWLEY: I want the record to  
5 reflect that Ms. Maxwell's attorney is  
6 directing her not to answer this series  
7 of questions.

8 MR. PAGLIUCA: It definitely does.

9 Q. Were you responsible for  
10 introducing Anuska to Jeffrey Epstein?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I already testified that I don't  
14 really recall Anuska.

15 Q. Were you responsible for  
16 introducing Johanna to Jeffrey Epstein?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. Again, I don't like the  
20 characterization of introduction. Johanna  
21 came to answer telephones.

22 Q. When did you -- were you the person  
23 who brought or introduced or met Johanna for  
24 purposes of bringing her to Jeffrey Epstein's  
25 home?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. That's not how I would characterize  
5 that.

6 Q. How would you characterize it?

7 A. I have testified that I'm  
8 responsible for finding professional people  
9 to work in the homes, age appropriate adult  
10 people, so from pool attendants, to  
11 gardeners, to chefs, to housekeepers, to  
12 butlers, to chauffeurs and one of the  
13 functions was to be able to answer the  
14 telephones and in the context of finding  
15 someone to answer the telephones, I did look  
16 to try to find appropriate people to answer  
17 the phones.

18 Q. So did you find Johanna for  
19 purposes of that role?

20 A. So in the course of looking for  
21 somebody to answer phones at the house,  
22 Johanna was one of the people who said that  
23 she was willing to answer phones.

24 Q. Did you approach her at her school  
25 campus?



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2 MR. PAGLIUCA: Objection to form  
3 and foundation.

4 A. I honestly don't recall how, in  
5 that moment, how I met Johanna and how she  
6 came to get the job but...

7 Q. Did you typically, in your work for  
8 Jeffrey Epstein, would you typically go to  
9 school campuses to try to find individuals to  
10 work for Jeffrey Epstein?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I never -- what do you mean by  
14 school? Let's characterize school.

15 Q. Any kind of school.

16 A. Obviously not. I never went to any  
17 school with young people. Johanna, I believe  
18 came from an adult university, as I would  
19 know in England, so university, I went there  
20 but I never went, as I best recollect,  
21 anywhere else.

22 Q. Did you -- what university was it  
23 that you went to?

24 A. I don't recall the university that  
25 she went to right now.

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2 Q. Would you visit more than one  
3 university to try to find individuals to work  
4 for Jeffrey Epstein?

5 A. As I recollect, I think that's, in  
6 fact, the only university I went to.

7 Q. Did you go there more than once?

8 A. I think I went twice.

9 Q. Who else did you find from that  
10 university, was there anybody other than  
11 Johanna?

12 A. I don't recollect, I'm sorry.

13 Q. We are going to mark this as  
14 Maxwell 13?

15 (Maxwell Exhibit 13, documents,  
16 marked for identification.)

17 Q. Can you take a look at the document  
18 I put in front of you, please.

19 Are you familiar with this  
20 document?

21 A. I'm familiar with this actual  
22 document.

23 Q. How was this document created?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. I don't know how this document was  
3 created.

4 Q. You were involved in the creation  
5 of this document?

6 A. I think you can see from the date  
7 that it's 2004, 2005, so no.

8 Q. You weren't involved in the  
9 creation of this document.

10 Did you -- we talked earlier about  
11 Mr. Epstein's house, I'm talking about the  
12 Palm Beach house where you said there was a  
13 computer on the desk, that employees had  
14 access to -- people who worked for Jeffrey  
15 Epstein may have had access to?

16 A. I think anybody could have had  
17 access to that.

18 Q. Was that computer used, if you know  
19 to keep a log of addresses and phone contact  
20 information for Jeffrey Epstein?

21 A. Are we talking about when this  
22 document was created.

23 Q. In general, was there, on that  
24 computer during the time that you were  
25 present with Jeffrey Epstein, was there a

1           G Maxwell - Confidential  
2 mechanism by which you kept electronic  
3 information of names and addresses of  
4 individuals that he knew?

5           MR. PAGLIUCA: Objection to the  
6 form and foundation.

7           A. I can't testify to what was on that  
8 computer or not after I was gone.

9           Q. Not when you were gone, when you  
10 were there. If Jeffrey wanted to call, for  
11 example, say Les Wexner, would someone be  
12 able to go to that computer to pull up the  
13 address information and phone contact  
14 information for that individual?

15           MR. PAGLIUCA: Objection to the  
16 form and foundation.

17           A. I couldn't possibly say.

18           Q. Did you ever have to keep track of  
19 address or phone contact information for  
20 Jeffrey Epstein?

21           A. That was not my job.

22           Q. Did you ever do it?

23           A. I am not responsible for keeping  
24 his numbers so that wasn't my job at all.

25           Q. But did you ever do it? I know

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2 it's not your job but did you ever do it, did  
3 you ever keep phone contact information for  
4 him?

5 A. During the course of the time we  
6 were together, if he gave me a telephone  
7 number, I would give it to an assistant to  
8 put in the computer, I could do that.

9 Q. Would he ask you for contact  
10 information for different individuals, if he  
11 wanted to contact someone?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. In the course of the long period of  
15 time when I was there, it certainly would be  
16 possible for him to ask me for a telephone  
17 number and if I had the -- I wouldn't always  
18 have it -- I'm sure it happened.

19 Q. Was there a hardcopy book in  
20 addition to the computer, a hardcopy book  
21 that you could look for numbers that were  
22 relevant to Jeffrey Epstein's life and  
23 something on the computer or was it just an  
24 electronic version?

25 MR. PAGLIUCA: Objection to the

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2 form and foundation.

3 Q. Was there a hard copy book as well  
4 as something on the computer or was there  
5 only electronic information on the phone  
6 numbers?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I can only testify to what I know  
10 obviously, and I believe that this is a copy  
11 of a stolen document. I would love to know  
12 how you guys got it.

13 Q. I'm asking during the time you  
14 worked for Jeffrey Epstein, was there a  
15 hardcopy document of any kind that kept phone  
16 numbers for Jeffrey Epstein, if he needed to  
17 contact someone?

18 A. The stolen document I have in front  
19 of me that you have is what you are referring  
20 to.

21 Q. So there was, during your time when  
22 you were there, there was no other, you  
23 mentioned there was information on a  
24 computer. Was there any hardcopy document  
25 that you could refer to to find someone's

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2 number?

3 A. You have the stolen document in  
4 front of you.

5 Q. You had access to this when you  
6 worked for Jeffrey Epstein?

7 A. This is, I believe, the book that  
8 was stolen, that was the hardcopy of whatever  
9 was there.

10 Q. So when you were working for  
11 Jeffrey Epstein, you were able to access this  
12 book?

13 A. This book -- if this is what this  
14 is, I believe it was, this is the stolen  
15 document from his house.

16 Q. And you were able to access it when  
17 you worked for him?

18 A. It was a document that was printed  
19 that you could, if you needed to, look for a  
20 number.

21 Q. Do you know how this book was  
22 created?

23 A. No.

24 Q. When you referred to it a moment  
25 ago, to a stolen document, when Alfredo

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2 Rodriguez turned this document over to the  
3 FBI, are you aware he described it as a  
4 document that came from your computer?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. I have no idea what he said or  
8 didn't say, so if you want me to reference  
9 something he said, you need to show it to me.

10 Q. Did you keep this document, an  
11 electronic copy of it, on your personal  
12 computer?

13 A. I don't recollect.

14 Q. If you had to update something, for  
15 example, if there was a new number, a new  
16 individual that Jeffrey had hired that you  
17 were going to track, would you input that  
18 information into this document on your  
19 computer?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I've already testified that I'm not  
23 responsible for updating and keeping these  
24 records.

25 Q. Did you have this document on your



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2 computer, your personal computer?

3 A. I told you, I don't recollect  
4 having this document on my computer.

5 Q. Do you know what computers this  
6 document was on, if more than one?

7 A. I'm sorry, this is a long time ago  
8 and I don't recall exactly how this was all  
9 managed.

10 Q. If you didn't create this document,  
11 do you know who did?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. I don't.

15 Q. I'm going to direct your attention  
16 to part of this document. It's towards the  
17 back, it's going to be page 91 and it has  
18 bates label Giuffre 001663. I'm going to  
19 direct your attention to the section that  
20 says, Massage Florida.

21 Did you input any of the names or  
22 numbers under that section?

23 MR. PAGLIUCA: Objection to form  
24 and foundation.

25 A. So this document is produced in

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2 2004, 2005, so, no.

3 Q. But I'm sorry, correct me if I'm  
4 misunderstanding your testimony, I thought  
5 you said when you were working with Jeffrey,  
6 that this document existed and it was  
7 something you utilized?

8 A. I can't possibly tell you what  
9 numbers were added or not added subsequent to  
10 my departure.

11 Q. So you can't recall if you added  
12 any of these numbers?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation, mischaracterizes  
15 the witness' testimony.

16 Q. Are there any numbers on here or  
17 names that you recognize that you would have  
18 entered into this section?

19 A. I already testified that I'm not  
20 responsible for inputting numbers and names  
21 into this so I would not be able to tell you.

22 Q. Are there any names or numbers  
23 under this section, Massage Florida, that you  
24 would have provided to an assistant to input  
25 into this document?

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2 A. I can't possibly say.

3 Q. Do you see under Massage Florida,  
4 about halfway down the first column, do you  
5 see a number that says Johanna's cell?

6 MR. PAGLIUCA: What page?

7 Q. It's 91, Bates number 001663.  
8 About halfway down, it says in the first  
9 column, it says Johanna's cell.

10 Do you see that?

11 A. I do.

12 Q. Would you have provided after, I  
13 know you didn't hire her, Jeffrey hired her  
14 but after you brought her to Jeffrey, would  
15 you have given her cell phone number to an  
16 assistant to input into this document?

17 MR. PAGLIUCA: Objection to form  
18 and foundation.

19 A. I didn't bring her to Jeffrey, the  
20 way you characterize and I would have no  
21 knowledge of how this number ended up in this  
22 book.

23 Q. I believe you, and I will try to  
24 use your words so we are clear, you met  
25 Johanna, is that correct?

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2 A. Yes.

3 Q. And then she began working for  
4 Jeffrey?

5 A. Yes.

6 Q. Would you have provided whomever  
7 was in charge of keeping this updated with  
8 Johanna's cell number so you would be able to  
9 contact her if needed?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. I don't know. It could have been a  
13 number of different ways, it it could have  
14 been Jeffrey who gave it to somebody.

15 Q. You just don't remember doing that?

16 A. I do not.

17 Q. Now, as you look -- I want you to  
18 take a look at the Florida massage list, it's  
19 three columns there.

20 Do you, as you look at those names  
21 on the various columns, do you know the ages  
22 of any of the girls in this list?

23 A. I don't know. One, I don't know  
24 who all the people are on this list and I  
25 certainly don't know the ages.

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2 Q. Do you know what their  
3 qualifications are?

4 A. I don't know who the people are in  
5 general so of course I don't know what their  
6 qualifications are.

7 Q. Do you know why Jeffrey has so many  
8 masseuses listed in Florida in his book here?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. Again, this book was created post  
12 my departure, so I couldn't explain why all  
13 these people were here.

14 Q. When you were there, you said this  
15 book existed?

16 A. Yes.

17 Q. So when you were there, were there  
18 a number of masseuses listed under the  
19 Florida massage?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation and  
22 mischaracterization of the witness'  
23 testimony.

24 Q. I'm asking you a question.

25 When you were there, were there a

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2 number of masseuses listed under the Florida  
3 massage section?

4 A. When I was there, I would have, of  
5 course there would have been some masseuses  
6 listed but I could not tell you who or how  
7 many and this -- I could not possibly because  
8 I wouldn't remember.

9 Q. Do you know why Jeffrey would have  
10 had so many names listed under his massage  
11 Florida?

12 MR. PAGLIUCA: Objection to form  
13 and foundation.

14 A. I can't testify to why Jeffrey has  
15 so many.

16 Q. Did he use a different masseuse  
17 every day?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 Q. You can answer.

21 A. When I was there he had a massage  
22 roughly every day, one masseuse, and mostly  
23 he would have them at random times, so it  
24 would be difficult if you just only had one  
25 person, man, woman, for an adult massage, to

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2 come and be available for whatever time it  
3 was. So he would have more than one person  
4 that he could call for a massage because at  
5 any given time the one that he called first  
6 may not have been available.

7 Q. So would it typically be a  
8 different person each day that would give him  
9 a massage?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. It would be, when I was there,  
13 based on availability.

14 Q. Would it surprise you to learn that  
15 the Federal Government found that some of the  
16 girls on this list under massage Florida were  
17 under the age of 18?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. I can't testify to what the  
21 government found or did not find because I  
22 would have no knowledge of it.

23 Q. I'm asking if you would be  
24 surprised by that?

25 MR. PAGLIUCA: Form and foundation.

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2 A. I have knowledge of it. I can't  
3 speculate.

4 Q. On the second column, towards the  
5 bottom, there is the name, it's one up from  
6 the bottom, there is the name Gwendolyn Beck,  
7 do you know Gwendolyn Beck?

8 A. I do.

9 Q. Who is she?

10 A. She was a friend of Jeffrey's.

11 Q. Is she a masseuse?

12 A. She, I don't think she was a  
13 masseuse, no.

14 Q. Why would be she listed under  
15 Florida massages?

16 A. An input error.

17 Q. Is this list any individual that  
18 would have sex with Jeffrey?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I wouldn't have any knowledge of  
22 that.

23 Q. Do you know if Jeffrey had sex with  
24 Gwendolyn Beck?

25 MR. PAGLIUCA: Object to the form



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2 and foundation.

3 A. First of all, I wouldn't have any  
4 knowledge of that.

5 MS. McCAWLEY: We are going to take  
6 a quick break.

7 THE VIDEOGRAPHER: It's now 4:39  
8 and we are off the record.

9 (Recess.)

10 THE VIDEOGRAPHER: It's now 4:54  
11 and we are as back on the record  
12 starting disk number 8.

13 Q. Ms. Maxwell, we were talking  
14 earlier about the journal and I believe you  
15 said in 2004, 2005, you were no longer  
16 working and responsible for that journal, is  
17 that correct?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. What are we referring to, this  
21 document right here?

22 Q. Yes.

23 A. I don't know who is the author of  
24 this or I can't tell you what is in here  
25 versus what would have been here when I was

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2 around. I can't testify to that.

3 Q. Were you around in 2004, 2005?

4 A. I already testified that I was  
5 there when Jeffrey's mother passed away and  
6 so you know, I did visit for her passing and  
7 I believe I was there for a couple of days in  
8 2005.

9 Q. So if an employee of Mr. Epstein in  
10 2004 said that you were the employee's direct  
11 supervisor, would that be incorrect?

12 MR. PAGLIUCA: Objection to form  
13 and foundation.

14 A. What employee, what's the  
15 circumstances and what is the story, I don't  
16 know what you are asking me.

17 Q. If Alfredo Rodriguez said in 2004  
18 when he was hired, you were his direct  
19 supervisor, would that be true?

20 A. No.

21 Q. Were you in 2004 supervising Sarah  
22 Kellen?

23 MR. PAGLIUCA: Objection to form  
24 and foundation.

25 A. I never supervised Sarah Kellen.

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2 Q. Did Sarah Kellen take orders from  
3 you?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. She worked for Jeffrey.

7 Q. If Alfredo Rodriguez said you had  
8 knowledge of underage girls coming to  
9 Jeffrey's home for the purpose of sex, would  
10 you contend that that is truthful?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation of the question.

13 A. I have no idea what you are talking  
14 about, I'm sorry.

15 Q. If Alfredo Rodriguez said that you  
16 have knowledge of underage girls coming to  
17 Jeffrey's home for the purpose of having  
18 massages involving sex, would you say that  
19 that statement is truthful?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I can't testify to what Alfredo  
23 said or didn't say.

24 Q. I'm saying if Alfredo said that you  
25 had knowledge that there were girls coming

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2 over to the house that were underage for the  
3 purposes of sex, would that statement be  
4 true?

5 MR. PAGLIUCA: Objection to form  
6 and foundation.

7 A. I can't testify to what Alfredo  
8 said or didn't say or what he thought.

9 Q. Did you have knowledge of underage  
10 girls coming to Jeffrey Epstein's house for  
11 the purpose of sex?

12 A. No.

13 Q. Earlier I believe you testified,  
14 correct me if I'm wrong, that the document  
15 that is in front of you, the thicker document  
16 was a stolen document.

17 Do you know who stole that  
18 document?

19 A. I have read that Alfredo stole the  
20 document.

21 Q. And where have you read that?

22 A. I believe it was reported in the  
23 press.

24 Q. Earlier we were talking about the  
25 computers at Jeffrey Epstein's home. Did you

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2 have a computer that was your computer  
3 located in Jeffrey Epstein's home?

4 MR. PAGLIUCA: Objection to form  
5 and foundation.

6 A. I've testified to the computer  
7 already. Even when I was around, there was a  
8 computer that people had access to.

9 Q. So is Alfredo Rodriguez telling the  
10 truth when he says that he downloaded that  
11 book from your computer?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. I couldn't possibly tell you what  
15 Alfredo did or didn't do or said or didn't  
16 say.

17 Q. Was it on your computer?

18 A. I already testified I have no idea  
19 where this document came from.

20 Q. Did you have a list of names of  
21 individuals with contact information for  
22 Jeffrey Epstein on your personal computer?

23 A. Again, that wasn't my computer. I  
24 already said that was a computer that lots of  
25 people would have, so I have no recollection

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2 of this document being on it, so I don't know  
3 where this came from.

4 Q. I understand the computer at the  
5 house that you're referencing. On a personal  
6 computer of yours, did you have that  
7 document?

8 A. I don't know where this document  
9 came from, so I can't possibly say this  
10 document was on any computer that I may have  
11 had access to.

12 Q. On a personal computer of your own,  
13 did you have lists of the phone numbers and  
14 contact information relating to Jeffrey  
15 Epstein?

16 A. Like everybody, I have an address  
17 book but I can't possibly testify to where  
18 this thing came from.

19 Q. Was it your address book or was it  
20 addresses that related to Jeffrey Epstein?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. I don't know what you're asking me.

24 Q. On your personal computer, the  
25 address book you are referencing, was it your

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2 address book with individuals you knew or was  
3 it an address book for your employer, Jeffrey  
4 Epstein?

5 A. Jeffrey has his situation and I  
6 have no -- this is Jeffrey's, it came from  
7 his home, so I can't testify to anything  
8 about this in that period of time.

9 Q. So you didn't have on your computer  
10 a list of contact information for individuals  
11 that was related to Jeffrey Epstein?

12 A. I don't recall exactly what I had  
13 back in 2004 and 2005, so I can't say what I  
14 had back then that relates to his addresses,  
15 I can't recall.

16 Q. So is it possible that someone  
17 could have downloaded from your personal  
18 computer a list of names and address that  
19 were affiliated with Jeffrey Epstein?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. This didn't come from any computer  
23 of mine.

24 Q. But is it possible that someone  
25 could have downloaded a list of names and

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2 addresses affiliated with Jeffrey Epstein  
3 from your computer?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I already said, I didn't have a  
7 computer there, so I don't know where this  
8 came from, I have no idea.

9 Q. I'm going to read to you some  
10 testimony from Alfredo Rodriguez's deposition  
11 and it's on page 370 and I want to ask you a  
12 question about it, if it's true or false?

13 MR. PAGLIUCA: I'm going to object  
14 unless you show the witness the  
15 document.

16 MS. McCAWLEY: I will pass it. We  
17 are not going to mark it. We will skip  
18 it.

19 Q. Did you ever tell Alfredo Rodriguez  
20 that he better watch out and better keep his  
21 mouth shut with respect to what occurred at  
22 Mr. Epstein's home?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. It doesn't sound like anything I



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2 would say.

3 Q. Did you ever threaten Alfredo  
4 Rodriguez in any way if he were to disclose  
5 information he learned from his employment  
6 with Jeffrey Epstein?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I'm happy to answer. No, I never  
10 threatened him in any way.

11 Q. Were you concerned that he was  
12 going to disclose that Jeffrey Epstein was  
13 trafficking underage girls?

14 MR. PAGLIUCA: Objection to the  
15 form and foundation.

16 A. First of all, there are so many  
17 things wrong with that question, but I have  
18 no knowledge of what you are talking about.

19 Q. Have you ever contacted or  
20 instructed anyone to contact any witness in  
21 this case for the purposes of threatening  
22 them not to testify in this case?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. I have never called anybody with

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2 reference to this case with any, anything you  
3 just mentioned, I never threatened anyone.

4 Q. Have you ever directed anyone to  
5 call any witnesses relevant to this case and  
6 threaten them not to testify?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I never done such a thing.

10 Q. Did Jeffrey Epstein or you ever ask  
11 any female, regardless of age, to carry  
12 Jeffrey's baby for him?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 Q. Or anything along those lines?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. Can you repeat the question,  
19 please?

20 Q. Did you or Jeffrey Epstein ever ask  
21 any female, regardless of age, to carry  
22 Jeffrey Epstein's baby for him?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. Are you asking --

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2 Q. To become pregnant, did you or  
3 Jeffrey Epstein ever ask any female to become  
4 pregnant and carry Jeffrey Epstein's baby for  
5 you or for Jeffrey?

6 MR. PAGLIUCA: Objection to form  
7 and foundation.

8 A. You need to be very specific. I  
9 have no idea what you are talking about.  
10 That's completely rubbish.

11 Q. Did you or Jeffrey Epstein ask any  
12 female to become pregnant and carry his baby  
13 for either him or you?

14 MR. PAGLIUCA: Objection to the  
15 form and foundation. Go ahead.

16 A. I can't testify to anything Jeffrey  
17 did or didn't do when I am not present, but I  
18 have never asked anybody to carry a baby for  
19 me.

20 Q. Or anything along those lines?

21 MR. PAGLIUCA: Object to the form  
22 and foundation.

23 Q. I want to make sure we are talking  
24 about the same thing, not physically carry a  
25 baby, I mean become pregnant with a baby?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 Q. I want to make sure we are clear.

5 A. I don't know what you are asking.

6 Q. That's why I want to make sure we  
7 are clear.

8 A. We are clear. I never asked  
9 anybody to carry a baby for me.

10 Q. Do you know if Jeffrey ever asked  
11 anybody to carry a baby for him?

12 A. I'm not going to characterize any  
13 conversation Jeffrey had with somebody else.

14 Q. You are not aware of that, is that  
15 your testimony?

16 A. I am testifying I never have and I  
17 will not testify for anything for Jeffrey.

18 Q. Did you ever hear Jeffrey ask  
19 anybody to carry a baby for him?

20 A. I don't recollect conversation  
21 about Jeffrey and babies in any form.

22 Q. Did Jeffrey ever tell he wanted to  
23 have a baby?

24 A. I don't recollect baby  
25 conversations with Jeffrey.

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2 Q. So he never told you he wanted to  
3 have a baby?

4 A. I don't recollect any baby  
5 conversations with him saying he wanted to  
6 have a baby.

7 Q. Did you ever bring any females to  
8 the Dubin's house that were not your friends'  
9 children that were under the age of 18?

10 MR. PAGLIUCA: Objection to form  
11 and foundation.

12 A. I have never, to my knowledge,  
13 brought anybody under the age of 18 that's  
14 not a friend of my family or my nieces or  
15 nephews to the Dubin household.

16 Q. Earlier today you testified, I  
17 believe, that with respect to your town home  
18 Jeffrey paid for some of that and then gave  
19 you a loan, is that correct?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I said, actually I think it was a  
23 loan, I believe it was a loan.

24 Q. The whole thing?

25 A. As best as I can recollect.

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2 Q. Did you pay that loan back?

3 A. I don't have any outstanding loans  
4 with him.

5 Q. So you paid it back?

6 A. I don't have any outstanding loans  
7 with him.

8 Q. That's not an answer to my  
9 question.

10 Did you pay back Jeffrey for the  
11 loans?

12 A. I have paid back any loans I had  
13 with him.

14 Q. You have or haven't?

15 A. Have.

16 Q. Were there any other gifts that  
17 Jeffrey gave you during the time period of  
18 say 1999 to the present that were in excess  
19 of \$50,000?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. What's the question again?

23 Q. Did Jeffrey give you any gifts in  
24 excess of amounts of \$50,000, I'm not talking  
25 about a scarf here or something

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2 insignificant, from 1999 to the present?

3 A. I can't recollect any gifts.

4 Q. Did he ever buy you a car?

5 A. I really don't recall, I can't  
6 recall, it's a long time ago.

7 Q. You can't recall if Jeffrey Epstein  
8 ever bought you a car?

9 A. I believe he did buy me a car, I  
10 don't recall how much it cost. I don't  
11 recall any of the financial details of that.

12 Q. Do you still have that car?

13 A. I don't.

14 Q. How long ago did you get rid of  
15 that car?

16 A. I don't recall all the cars. There  
17 was a car back -- there was -- I don't  
18 recall, I'm sorry.

19 Q. He supplied you with several cars?

20 MR. PAGLIUCA: Object to the form  
21 and the mischaracterization of the  
22 testimony.

23 A. I don't recall details of the cars.

24 Q. Did he supply with you more than  
25 one car?

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2 A. Over the course of time, I've  
3 driven many cars.

4 Q. That Jeffrey provided to you?

5 A. They were cars that could be driven  
6 and I just don't recall them.

7 Q. Were they in your name?

8 A. I don't recall.

9 Q. You don't recall if Jeffrey Epstein  
10 ever put a car in your name?

11 A. We are talking a long time ago, I  
12 really don't recall.

13 Q. When is the last time you had a car  
14 from Jeffrey Epstein that you used?

15 A. 2000, 2001, 2002.

16 Q. Do you recall what kind of a car  
17 that was?

18 A. I don't recall, I'm sorry.

19 Q. Did Jeffrey Epstein purchase  
20 anything else for you besides the townhouse  
21 and cars that would be over the amount of  
22 \$50,000?

23 A. I didn't say that he did, I said I  
24 had a loan.

25 Q. Besides the loan, I'm sorry, you



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2 are right, you did say you had a loan and you  
3 said you paid that back, correct?

4 A. That's my testimony.

5 Q. Anything else in excess of \$50,000  
6 that he would have purchased for you?

7 A. We are talking 2002, 2001, I don't  
8 recall any gifts really.

9 Q. When is the last time Jeffrey  
10 Epstein gave you a gift in excess of \$50,000?

11 MR. PAGLIUCA: Assumes facts not in  
12 evidence. Form and foundation.

13 Q. You're saying you don't remember  
14 from 2001 and 2002. I'm asking when is the  
15 last time you remember Jeffrey Epstein  
16 purchasing a gift for you?

17 A. I don't recall gifts in excess of  
18 \$50,000, I barely recall gifts, I barely  
19 recall a lot of this -- I'm sorry, I don't  
20 recall.

21 Q. Is Jeffrey Epstein paying for your  
22 legal fees in this case?

23 A. No.

24 Q. Is he paying for anything related  
25 to this case?

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2 A. No.

3 Q. Are you aware of any grand theft  
4 police report relating to Virginia Roberts?

5 A. I believe I've read a report in the  
6 press on that.

7 Q. Did you provide the press with a  
8 report on a grand theft by Virginia Roberts?

9 A. I don't know how the press got that  
10 story.

11 Q. Do you know if Virginia Roberts  
12 committed a grand theft?

13 A. I only know what I read in the  
14 press.

15 Q. Did you ever state to the press  
16 that Virginia Roberts committed a grand  
17 theft?

18 A. I've never had any conversation  
19 directly with press.

20 Q. Did any of your representatives  
21 ever inform the press that Virginia Roberts  
22 committed a grand theft?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. I have no way of knowing what my

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2 representatives said to press or didn't.

3 Q. Did they ever discuss with you the  
4 fact that they were going to report that  
5 Virginia Roberts participated in a grand  
6 theft?

7 A. I don't know how, first of all, I  
8 don't know how I know that. I believe I read  
9 it in a press report so...

10 Q. I'm going to mark this as composite  
11 exhibit, Maxwell 14 please?

12 (Maxwell Exhibit 14, email, marked  
13 for identification.)

14 Q. I'm going to direct you to page GM  
15 00109. At the top of that page you are going  
16 to see an email address from Jeffrey Epstein  
17 on Sunday June 12, 2011 to [REDACTED]

18 [REDACTED]

19 A. Yes.

20 Q. The re line says, This is the  
21 actual version they wanted me to send which I  
22 changed but this is back from my U.K.  
23 lawyers.

24 Do you see that?

25 A. Yes.

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2 Q. If you go down further, you're  
3 going to see halfway through the page, you  
4 will see your email address the [REDACTED]  
5 and you will see a statement that says, Thank  
6 you. I have it now. I'm working on the  
7 letter a little. I will send final version  
8 tomorrow and whatever is in it will be  
9 factually accurate.

10 Beneath that you will see Philip  
11 Barden who I believe you identified earlier  
12 as one of your attorneys?

13 A. Uh-huh.

14 Q. And you will see a letter, starting  
15 the text of a letter starting, I want you to  
16 turn to the second page which is GM 00110.  
17 About halfway through the page, it says you  
18 will also presumably draw attention to the  
19 fact that prior to filing her suit against  
20 Mr. Epstein, Ms. Roberts fled the U.S. to  
21 avoid being arrested for grand theft. Police  
22 report available.

23 What grand theft were you referring  
24 to there that Virginia Roberts committed?

25 MR. PAGLIUCA: Objection to the

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2 form and foundation.

3 A. I don't know. However, I believe  
4 she stole money from somewhere where she  
5 worked.

6 Q. How do you know that was grand  
7 theft?

8 A. I don't know how I know that.

9 Q. So you authorized a statement that  
10 characterized that as grand theft without  
11 knowing whether it was grand theft?

12 A. What month, what is the date of  
13 this?

14 Q. The date of this is June 12, 2011?

15 A. So I'm afraid such a long time ago,  
16 I'm not sure how, I really couldn't testify  
17 as to how that language ended up in here.

18 Q. Do you have the police report? It  
19 says police report available. Do you have  
20 that document?

21 A. I don't have that document.

22 Q. Who does?

23 A. I have no idea.

24 Q. Would your lawyer Philip Barden  
25 have that document?

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2 A. I don't know who has this document.

3 Q. What's your basis in that statement  
4 for saying Ms. Roberts fled the U.S.?

5 A. Again, you are asking me for a  
6 statement that I made in 2011 and I can't say  
7 what in 2011 exactly the basis of that  
8 statement was.

9 Q. So you don't know whether or not  
10 that statement is true?

11 A. This is in 2011 and it never went  
12 out, so I'm not sure exactly.

13 Q. But you said in your email that you  
14 were working to make it factually accurate,  
15 is that correct?

16 A. That's what it says.

17 Q. I'm going to mark as Maxwell 15 a  
18 document dated February 24, 2015?

19 (Maxwell Exhibit 15, email, marked  
20 for identification.)

21 Q. This is an email from Ross Gow who  
22 you've identified as your press agent on  
23 February 24, 2015 to [REDACTED] which I understand  
24 to be your email address and Philip Barden.  
25 The subject line says, VR cried rape. Prior

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2 case dismissed as prosecutors found her not  
3 credible. The message says, Ghislaine, some  
4 helpful leakage, dot dot dot. What is it you  
5 were leaking to the press?

6 MR. PAGLIUCA: Objection, there is  
7 no foundation that she leaked anything  
8 and you know that.

9 Q. What was it that you were leaking  
10 to the press in that statement?

11 A. Again, I don't think that's  
12 referring to that, that's just referring to  
13 the press getting hold of whatever story it  
14 is.

15 Q. What was Ross Gow leaking to the  
16 press?

17 MR. PAGLIUCA: Objection to form  
18 and foundation.

19 A. It doesn't say Ross was leaking  
20 anything. It doesn't say that.

21 Q. The statement says, helpful  
22 leakage, is that correct?

23 A. It says helpful leakage. That  
24 doesn't mean he leaked anything.

25 Q. Did you leak to the press

1           G Maxwell - Confidential  
2           information to the press information about  
3           the subject line, VR cried rape, prior case  
4           dismissed as prosecutors found her not  
5           credible?

6           A.    I don't no idea what Ross is  
7           referring to. I think he is referring to the  
8           press held the story. I couldn't testify to  
9           that.

10          Q.    Did you leak to the press  
11          information regarding the statement, VR cried  
12          rape prior case dismissed as prosecutors  
13          found her not credible, either through you or  
14          through your press agents?

15          A.    I think this is coming from the  
16          daily mail.

17          Q.    That is not my question, I'm asking  
18          whether you or your press agent leaked that?

19          A.    I have no knowledge, I have no  
20          idea, I'm sorry. I can't -- I have no  
21          recollection. I have no idea what she is  
22          talking about.

23          Q.    I'm going to mark this as 16?

24                   (Maxwell Exhibit 16 email marked  
25                   for identification.)



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2 Q. This is an email addressed at the  
3 top from Jeffrey Epstein on Monday, January  
4 12, 2015 to [REDACTED] which I understand to be  
5 your email address. The email reads, You can  
6 issue a reward to any of Virginia's friends,  
7 acquaints, family, that come forward to help  
8 prove her allegations are false. The  
9 strongest is the Clinton dinner and the new  
10 version of the Virgin Islands that Stven  
11 Hawking practiced in an underage orgy.

12 Did you offer any rewards to  
13 Virginia's family or friends to contradict  
14 Virginia's story?

15 A. Absolutely not.

16 Q. Did Jeffrey Epstein offer any  
17 rewards to any of Virginia's, as he suggests  
18 here, friends, family or acquaintances to  
19 contradict Virginia's story?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I have no idea what he did.

23 Q. Did he tell he was going to offer  
24 rewards to Virginia's acquaintances, friends  
25 and family to prove her allegations were

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2 false?

3 A. He did not.

4 Q. Do you know whether Jeffrey Epstein  
5 paid Rebecca Boylen to give testimony about  
6 Virginia Roberts?

7 A. I don't know who Rebecca Boylen is.

8 Q. So you don't know whether Jeffrey  
9 Epstein paid her?

10 A. I don't know who Rebecca Boylen is.

11 Q. Have you ever contacted any of  
12 Virginia's friends, acquaintances or family  
13 regarding this case?

14 A. I don't know who Virginia's friends  
15 or family are and I have not contacted  
16 anybody related to her in any way, shape or  
17 form.

18 Q. I will turn you, I believe it's the  
19 thicker document which is Maxwell, I believe  
20 it was 14, right there, the compilation  
21 document to GM, at the bottom, GM 00071. You  
22 actually may want to turn to the prior page  
23 70 so you can see the email chain. At the  
24 top of the page --

25 MR. PAGLIUCA: I don't have a 00071

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2 on mine.

3 MS. McCAWLEY: It's the second page  
4 in that document.

5 MR. PAGLIUCA: Okay.

6 Q. It's dated Friday March 11, 2011  
7 from Maxwell to Jeffrey with the title, Daily  
8 Mail and there is a forward from Ross Gow to  
9 you and a number of other individuals, that's  
10 on the cover page and as you scroll to the  
11 second page, you are going to see that part  
12 of the chain that I'm asking about and that  
13 is the chain at the bottom which is dated  
14 3/10/2011 from Brian Basham and it says we  
15 think -- we should think about the letter to  
16 the editor. School can be university. Age  
17 of consent in Florida is complex. See below,  
18 if you are 16 years old, a sexual  
19 relationship with someone between 18 and 24  
20 is legal in Florida. Two persons between 16  
21 and 24, Florida statute 794.05. A person 24  
22 years or of age or older who engages in  
23 sexual activity with a person 16 or 17 years  
24 of age commits a felony in the second degree.  
25 So as soon as you turn 16 you are able to

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2 have sexual relations and you can have sexual  
3 relations with a minor under the age of 18  
4 until your 24th birthday.

5 Why were you concerned with the age  
6 of consent in Florida?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation of the question.

9 A. I wasn't concerned. I think this  
10 was somebody sending me the statute for  
11 informational purposes.

12 Q. Who is Brian Basham?

13 A. He is the person who, Ross Gow's  
14 boss I believe, I don't know what the  
15 relationship is.

16 Q. I didn't hear you?

17 A. I think he owns the agency, I'm not  
18 sure exactly.

19 Q. Why would he be sending you  
20 information addressing concerns about the age  
21 of consent in Florida?

22 MR. PAGLIUCA: Objection to the  
23 form and foundation.

24 A. I think he was just trying to be --  
25 telling me details that would happen,

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2 Virginia in '11 was claiming she was 15 and  
3 we thought she was 17. I didn't know what  
4 the statutes were in Florida and I think he  
5 was just trying to be helpful so I would  
6 know.

7 Q. Did you have a concern that you had  
8 violated this statute in Florida?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. No.

12 Q. Did you have a concern that Jeffrey  
13 Epstein had violated this statute in Florida?

14 A. I'm not concerned what happened  
15 with Jeffrey. I'm only concerned what  
16 happens with me.

17 Q. Why did you communicate with your  
18 press agent about the sexual consent age in  
19 Florida?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation. It misstates her  
22 testimony.

23 A. I wasn't concerned. I think he was  
24 being helpful and stating what the statute  
25 was.

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2 Q. I'm going to turn you now in that  
3 same stack the Bates number GM 00088. At the  
4 top of the email you are going to see Jeffrey  
5 Epstein, dated June 8, 2011, to you and it's  
6 got a re line, Vanity Fair. If you go down  
7 the chain you will see where it says under  
8 your email, Do you have a problem with  
9 anything I said.

10 Were you communicating with Jeffrey  
11 to confirm what statements you could put in  
12 any press releases you were given?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. Any interest I have is in accuracy.

16 Q. Were you confirming with Jeffrey  
17 Epstein what information you could put in  
18 press releases?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. Again, I'm only looking for  
22 accuracy.

23 Q. Why would you ask him if he had a  
24 problem with anything you were saying?

25 A. If there is anything I

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2 characterized that was not correct.

3 Q. That's not what you said. You  
4 said, do you have a problem with anything I  
5 said.

6 MR. PAGLIUCA: Objection to the  
7 form and foundation. There is no  
8 question pending.

9 MS. McCAWLEY: There is.

10 MR. PAGLIUCA: That's not a  
11 question, it's a statement.

12 MS. McCAWLEY: Don't interrupt me.

13 Q. Di you say, do you have a problem  
14 with anything I said?

15 A. That was asking in my parlance that  
16 I wanted him to check it for accuracy.

17 Q. Did he tell you there was anything  
18 inaccurate about the statement?

19 A. Again, I have to read the whole  
20 thing to figure that out.

21 Q. Were you coordinating with Jeffrey  
22 Epstein during this time period in 2011  
23 regarding statements that you were issuing to  
24 the press?

25 MR. PAGLIUCA: Did you withdraw the

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2 last question.

3 MS. McCAWLEY: I'm not withdrawing  
4 anything. I'm asking a question.

5 MR. PAGLIUCA: There was a question  
6 pending. You didn't let the witness  
7 answer the question, then you moved on  
8 to another question so I'm asking for  
9 clarification for the record now which  
10 question are we answering.

11 MS. McCAWLEY: There is an answer.  
12 The question was did he tell you  
13 anything, there was anything in the  
14 statement inaccurate about the statement  
15 and she said again, I read the whole  
16 thing --

17 THE WITNESS: I would have to.

18 MS. McCAWLEY: -- I would have to  
19 read the whole thing to figure that out.

20 MR. PAGLIUCA: Then she started  
21 reading it and you asked another  
22 question.

23 MS. McCAWLEY: That's the question.

24 MR. PAGLIUCA: I'm wondering if its  
25 still pending.



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2 MS. McCAWLEY: It was answered.

3 Q. Were you coordinating with Jeffrey  
4 Epstein during the time period in 2011  
5 regarding the statements you were issuing to  
6 the press?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I only wanted to be accurate in any  
10 factual statements that I made.

11 Q. You knew at that time that Jeffrey  
12 Epstein had been convicted for sexual abuse  
13 of a minor, is that correct?

14 MR. PAGLIUCA: Objection to form  
15 and foundation.

16 A. He was sentenced I believe for  
17 underage -- soliciting an underaged  
18 prostitute.

19 Q. You knew that he was a registered  
20 sex offender?

21 A. Yes.

22 Q. You were coordinating with him the  
23 statement that you were going to be making to  
24 the press to confirm whether they were  
25 accurate in your words?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I was not coordinating with  
5 Jeffrey. He had details that I did not have.  
6 I was not party to his case. I needed to  
7 have information in order to be able to  
8 respond so I was not coordinating with him.  
9 I was merely asking for details that I could  
10 have.

11 Q. Did Jeffrey write any of your press  
12 statements for you?

13 A. No.

14 Q. He didn't draft any of them?

15 A. I have a lawyer who was working on  
16 this and that was -- I asked, I believe as I  
17 recollect asked him for information to make  
18 sure I was being accurate in the  
19 representations for whatever I was  
20 discussing.

21 Q. Did Jeffrey provide you with any  
22 drafts of statements to provide to the press?

23 A. I only recall drafts from my  
24 lawyer.

25 Q. I will mark this as Maxwell 17.

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2 (Maxwell Exhibit 17, email, marked  
3 for identification.)

4 Q. This is an email from you on  
5 January 10, 2015 to Philip Barden and Ross  
6 Gow. The statement you had before you  
7 earlier, that, if you can pull that in front  
8 of you, the one page press release that you  
9 gave. You might know from memory.

10 Was the press release that you  
11 issued with the statement about Virginia  
12 issued in or around January 2, 2015?

13 A. As best as I can recollect.

14 Q. I want to turn your attention to  
15 the document I just handed you which is Bates  
16 No. 001044, from you to Philip Barden and  
17 Ross Gow. It says in the first sentence, I'm  
18 out of my depth to understand defamation,  
19 other legal hazards and I don't want to end  
20 up in a lawsuit aimed at me from anyone, if I  
21 can help it. Apparently, even saying  
22 Virginia is a liar has hazards.

23 You knew at the time you called  
24 Virginia a liar in early January of 2015 that  
25 that was something that would result in a

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2 lawsuit, is that correct?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. I have legal advice that I took.

6 Q. But you knew in early January by  
7 making a statement calling Virginia a liar  
8 that you were subjecting yourself to a legal  
9 dispute with her?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. I took legal advice as to what  
13 should be said and not be said and the legal  
14 advice that came from the United Kingdom  
15 was --

16 MR. PAGLIUCA: You are not allowed  
17 to talk about any legal advice that you  
18 got from anybody that's a lawyer.

19 A. Sorry.

20 Q. So is it correct without telling me  
21 what you talked to your lawyers about that  
22 you knew because this is dated January 10  
23 that when you made this statement in early  
24 January, January 2 of 2015 you knew that  
25 calling Virginia a liar would subject you to

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2 a legal action, isn't that correct?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation. As to what you  
5 knew -- whatever she knows would be  
6 privileged.

7 MS. McCAWLEY: I'm asking if she  
8 knows. I'm not asking her to tell me  
9 about her privileged communications.

10 A. All I can say is I asked a question  
11 and received legal advice.

12 (Maxwell Exhibit 18, email, marked  
13 for identification.)

14 Q. This is an email dated January 15,  
15 2015 from Jeffrey Epstein to you?

16 A. Uh-huh.

17 Q. It states in the first line, do you  
18 want ██████ to come out and say she was the  
19 girlfriend during the time?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation of the question and  
22 actually the word is ██████, there  
23 is no vowel in there.

24 MS. McCAWLEY: I was just trying to  
25 pronounce it.

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2 Q. This email reads do you want  
3 [REDACTED] without a vowel, to come out and say  
4 she was the girlfriend during the time.

5 Who was Jeffrey Epstein referring  
6 to?

7 A. I believe he was referring to  
8 [REDACTED].

9 Q. Why was he asking you if you wanted  
10 [REDACTED] to come out and say she was the  
11 girlfriend?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. The way the press and you were  
15 characterizing me is I was with Jeffrey  
16 throughout this entire period of time and I  
17 was not.

18 Q. Was [REDACTED] with Jeffrey during this  
19 period of time?

20 A. I believe she was.

21 Q. Did Jeffrey come out and tell the  
22 press it was [REDACTED] and not you that was with  
23 him as he is proposing here?

24 A. I don't believe he did.

25 Q. Did you want him to do that?

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2 A. No, I didn't ask him to do  
3 anything. No.

4 Q. So do you know in January of 2015,  
5 was [REDACTED] his girlfriend?

6 A. 2015, I have no idea who was his  
7 girlfriend in 2015.

8 Q. I'm sorry, you are correct.

9 In the period of 1999 to 2002, was  
10 [REDACTED] his girlfriend?

11 A. They spent a lot of time together.

12 Q. Did you talk to [REDACTED] about going  
13 to the press and saying that she was the  
14 girlfriend and not you?

15 A. I have never spoken to [REDACTED]

16 Q. Was [REDACTED] offered any money to  
17 make a statement that she was the girlfriend?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. I have no idea. I have never  
21 spoken to [REDACTED] and I don't know anything --  
22 I have no idea.

23 (Maxwell Exhibit 19, email, marked  
24 for identification.)

25 Q. That's an email from Jeffrey to

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2 Maxwell dated January 25, 2015.

3 A. Uh-huh.

4 Q. I will direct your attention to the  
5 bottom email which is from you on Saturday  
6 January 24, 2015. It says, I would  
7 appreciate it if [REDACTED] would come out and  
8 say she was your girlfriend. I think she was  
9 from the end of '99 to 2002.

10 Does that refresh your recollection  
11 that you asked Jeffrey to have [REDACTED] come  
12 out and say she was his girlfriend?

13 A. I'm sure I would loved anybody to  
14 come out and say they were with Jeffrey  
15 rather than me.

16 Q. Was that an accurate statement you  
17 were asking to be made to the press?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. When is this?

21 Q. 2015. The statement is whether she  
22 was the girlfriend from '99 to 2002. As the  
23 email reads.

24 A. What is your question?

25 Q. My question is, was that an



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2 accurate statement you were going to be  
3 giving to the press?

4 A. I didn't make the statement and  
5 [REDACTED] never came out, so it's completely  
6 moot.

7 Q. My question is, was it an accurate  
8 statement that [REDACTED] was the girlfriend from  
9 '99 to 2002 or were you just making that up  
10 for purposes of deflecting press from you?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. As I said they spent a lot of time  
14 together and...

15 Q. Were you also his girlfriend from  
16 '99 to 2002?

17 A. I don't if I would have ever  
18 characterized myself as his girlfriend, but  
19 [REDACTED] at that time, was with him as much if  
20 not more than I was.

21 Q. I will mark this as Maxwell 20?  
22 (Maxwell Exhibit 20, email, marked  
23 for identification.)

24 Q. This is an email at the top, it's  
25 Bates labeled 001060. At the top is a chain

1                   G Maxwell - Confidential  
2           from Jeffrey to you on January 11, 2015 and  
3           if you look below, I'm going to start at the  
4           bottom of that chain which is January 11 at  
5           9:15 from Jeffrey and he wrote, Alan, do you  
6           have an article coming out in Monday's paper.  
7           If so, could you please forward us a copy.

8                   Do you know what Alan Jeffrey was  
9           referring to there?

10           A.    I don't know.

11           Q.    If you look up in the email chain  
12           do you see an email address from Alan  
13           Dershowitz responding to that letter?

14           A.    I do.

15           Q.    So that would be Alan Dershowitz  
16           that Jeffrey was emailing at that time  
17           according to this chain, correct?

18           A.    It certainly looks like it.

19           Q.    The email from Alan to Jeffrey is,  
20           Nothing on Monday. I'm working on several  
21           possible articles about unfairness in the  
22           legal process that allows false charges to be  
23           inserted into legal documents with no  
24           opportunity to respond.

25                   And do you see above that Jeffrey's

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2 email to you says, quote, Careful.

3 A. Is that to me or to Alan?

4 Q. Jeffrey to [REDACTED] at the top. Why  
5 was Jeffrey telling you to be careful?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. I have no idea.

9 Q. What was he concerned about with  
10 Alan Dershowitz's suggestion in the email  
11 below?

12 MR. PAGLIUCA: Objection to form  
13 and foundation.

14 A. I can't possibly know.

15 Q. Did you discuss with him why he  
16 told you to be careful?

17 A. I had limited contact with him. I  
18 don't recall where this goes in the chain,  
19 why he was telling me to be careful, I have  
20 no idea.

21 Q. Did you respond to this email?

22 A. If you don't have it, I didn't  
23 respond.

24 Q. Did you ever delete emails during  
25 the period of January of 2015?

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2 A. I have every email that you asked  
3 for in discovery, that I have I gave you.

4 Q. That's not my question.

5 Did you ever delete emails in  
6 January of 2015?

7 A. I have not deleted anything that  
8 you have asked me for in discovery. I have  
9 given you everything that I have.

10 Q. That is not my question, my  
11 question is, did you ever delete emails in  
12 January of 2015?

13 A. In the normal course of my work,  
14 there are emails from spam that I delete.  
15 That is the type of email I've deleted.  
16 Anything that is material to what you want, I  
17 have not deleted.

18 Q. How do you know that?

19 A. Well, anybody that's to do with  
20 Jeffrey or Alan or women or anything of which  
21 I know you were interested in, of which I  
22 have anything I would not have done because I  
23 don't want to subject myself to...

24 Q. Have you had your computer  
25 forensically copied for purposes of this

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2 litigation?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. Has someone made a copy of your  
6 computer for purposes of this litigation.

7 A. No.

8 Q. Are you a citizen of the United  
9 States?

10 A. I am.

11 Q. Are you also a citizen of England?

12 A. I am.

13 Q. Are you a citizen of any other  
14 land?

15 A. TerraMar.

16 Q. That's the name of your charity  
17 project that deals with oceans, is that  
18 correct?

19 A. Yeah. I'm French as well.

20 Q. Has Jeffrey Epstein funded TerraMar  
21 for you?

22 A. He did give some money to TerraMar,  
23 yes.

24 Q. How much?

25 A. I believe it was \$50,000.

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2 Q. Earlier today, you said you were in  
3 the process of resolving the sale of your  
4 town home. Where do you intend to live once  
5 your town home is sold?

6 A. That's a good question. I don't  
7 have an answer for you yet.

8 Q. You don't have a present plan. Do  
9 you intend to live in the United States?

10 A. I don't have a present plan.

11 Q. Are you living outside of your town  
12 home right now or are you still there?

13 A. I'm just couch surfing.

14 Q. Has Jeffrey Epstein ever purchased  
15 a company for you or put a company in your  
16 name?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I have no recollection.

20 Q. Is there a Ghislaine Maxwell  
21 corporation, for example?

22 A. No, not that I am aware of that has  
23 anything to do with me. There may be with  
24 one that someone else owns or started but not  
25 one that is related to me.

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2 MS. McCAWLEY: I'm going to take a  
3 short break and make sure to keep it  
4 short because I know you wanted to -- I  
5 just want to wrap up what we have left.

6 THE VIDEOGRAPHER: It's now 5:49 we  
7 are off the record.

8 (Recess.)

9 THE VIDEOGRAPHER: It's now 6:00  
10 p.m. and we are back on the record.

11 Q. Ms. Maxwell, do you recall being  
12 subpoenaed for a deposition back in 2009?

13 A. I do.

14 Q. Why did you avoid giving your  
15 deposition in that case when you were  
16 subpoenaed and had the opportunity to tell  
17 your side of the story?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. That's not what happened.

21 Q. What happened?

22 A. As I best recall, I was subpoenaed  
23 and a date was set for the subpoena and  
24 everything was set and I believe it was with  
25 Brad Edwards, correct me if I'm wrong, and

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2 Brad Edwards failed to show up for the  
3 subpoena.

4 Q. So your testimony is Brad Edwards  
5 did not show up for the deposition that had  
6 been set?

7 A. Correct.

8 Q. Did you give any statement that  
9 your mother was ill and, therefore, you  
10 couldn't take your deposition and had to  
11 leave the country indefinitely?

12 A. That's an entirely separate  
13 situation. Brad Edwards was involved in the  
14 Rothstein scandal which was a RICO, I  
15 believe, you know, is when fake suits were  
16 created in Jeffrey's case and Rothstein went  
17 to jail for 50 years and Brad Edwards worked  
18 for that firm.

19 Q. And Mr. Edwards worked for that  
20 firm?

21 A. So when the subpoena came, Brad  
22 Edwards was involved with Rothstein in the  
23 case so when I was called for subpoena, then  
24 and I had a subpoena, date and time set, Brad  
25 Edwards went AWAL, meaning he failed to



1           G Maxwell - Confidential  
2       respond to calls and failed to get in touch  
3       with my attorneys, even though a date and  
4       time was set for the subpoena and so that's  
5       what happened to that subpoena. It just  
6       didn't happen.

7           Q.     We may be talking about two  
8       different cases so I will ask the question  
9       again.

10                 Was there ever a time where you  
11       were subpoenaed to sit for a deposition that  
12       you could not make it because you said that  
13       your mother was ill?

14           A.     So that is the same subpoena that  
15       Brad Edwards failed to turn up for and then I  
16       think five or six months passed between -- a  
17       period of time, I can't characterize it  
18       exactly, a period of time passed where then  
19       he resurfaced and asked for a new subpoena to  
20       be -- a new time to be set and because he had  
21       contacted the press and done all sorts of  
22       things that you guys are familiar with, I  
23       believe, it was my lawyer suggested that I  
24       should have some sort of protective order and  
25       I believe between the time for when Brad

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2 Edwards resurfaced after the Rothstein story,  
3 when the guy went to jail for 50 years for  
4 creating fake cases in Jeffrey's and other  
5 people's cases, in between the time when  
6 there were -- trying to figure out the  
7 protective situation for me, my mother was  
8 sick, she is 89, she was 89 at that time so I  
9 -- they -- we can all -- we all have parents,  
10 so anyone, I don't know how old your parents  
11 are but any parent or godparent, any  
12 individual who is in the late 80s 90s, we can  
13 understand has health issues so my mother's  
14 health was deteriorating very rapidly at that  
15 time and we had issues at home with who she  
16 would talk to and how to manage her, her  
17 healthcare situation and so I went home.  
18 They were still arguing about the protective  
19 order --

20 Q. Is it your testimony that there was  
21 not a date set for your deposition at the  
22 time you left to go see your mother?

23 A. I don't believe so.

24 Q. Are you friends with the Clintons?

25 A. I am.

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2 Q. Did you attend a wedding of Chelsea  
3 Clinton a few weeks after the date was set,  
4 let's say a few weeks after you left to go  
5 see your mother who was ill?

6 A. I don't recall exactly when I left  
7 but it was before, a few weeks before -- I  
8 don't remember the exact timing of that, so  
9 I'm sorry, can you repeat the question?

10 Q. Did you come back to the United  
11 States to attend Chelsea Clinton's wedding?

12 A. I attended Chelsea Clinton's  
13 wedding but I don't know if I came back  
14 specifically for that or not.

15 Q. When we were looking at the flight  
16 logs earlier, there was a flight where you  
17 ended up in the naval base, I believe it was  
18 in China, do you know how you got clearance  
19 to land at that naval base?

20 A. I need to have a look at whatever  
21 document.

22 Q. It's one of the flight logs, it was  
23 on the flight with Clinton when we were  
24 talking about you landed at a naval base. I  
25 know you are a pilot, do you know what you

1 G Maxwell - Confidential

2 had to do to get clearance to land at that  
3 naval base.

4 MR. PAGLIUCA: If you need to look  
5 at something to answer the question, you  
6 can. If you can't answer the question  
7 without looking at something just  
8 indicate such.

9 A. Regardless, I wouldn't have any  
10 knowledge of that.

11 Q. Was Sarah Kellen traveling with you  
12 on the flights you were on with Clinton?

13 A. I would have to look at a document.  
14 I wouldn't know if she was on all of them or  
15 not. I don't know.

16 Q. Do you recall her being on any of  
17 them?

18 A. To the best of my recollection, I  
19 think she was. I don't recollect exactly  
20 what flight she was on or not.

21 Q. Sarah Kellen was one of the  
22 co-conspirators, physically, in the  
23 nonconstitution agreement, is that correct?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. I have never seen the document but  
3 my understanding, I believe, is that she was.

4 Q. Did you ever stay the night ever at  
5 Les Wexner's house in Ohio, have you ever  
6 stayed the night there?

7 A. In his home in Ohio?

8 Q. Yes.

9 A. I don't believe I did.

10 Q. Are you aware of anybody providing  
11 Jeffrey with two 12 year old girls as a  
12 birthday present?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. No.

16 Q. Are you aware of anybody ever  
17 providing Jeffrey with French girls under the  
18 age of 18 as a birthday present?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. No.

22 Q. Do you know whether Jean Luc Brunel  
23 provided girls under the age of 18 to Jeffrey  
24 for the purposes of sex?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I am un -- the answer is no, I  
4 don't know anything about that.

5 Q. Did you ever witness Jean Luc  
6 Brunel bringing girls under the age of 18 to  
7 any of Jeffrey residences?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. I don't recollect Jean Luc coming  
11 to the house with girls, period.

12 Q. Do you, when I say house, I'm  
13 including the U.S. Virgin Island home.

14 Do you recollect Jean Luc Brunel  
15 bringing foreign girls under the age of 18 to  
16 the U.S. Virgin Island house?

17 A. I don't recollect anything like  
18 that.

19 Q. Do you know how Jeffrey Epstein  
20 made his money?

21 A. No.

22 Q. Was Les Wexner or is Les Wexner one  
23 of his clients?

24 A. I have no idea.

25 Q. What do you know about the

1 G Maxwell - Confidential

2 relationship between Jeffrey Epstein and Les  
3 Wexner?

4 A. Are you talking today?

5 Q. Yes, today.

6 A. I have no idea.

7 Q. Do they have a business  
8 relationship?

9 A. I have no idea.

10 Q. Did they have a business  
11 relationship during the time that you were  
12 working for Jeffrey Epstein?

13 A. I believe in the '90s when I was  
14 there they had a business relationship.

15 Q. Did they have any other kind of  
16 relationship?

17 MR. PAGLIUCA: Objection to form  
18 and foundation.

19 A. The only relationship I am aware of  
20 is the business relationship.

21 Q. Do you know why Les Wexner sold the  
22 New York house or gave the New York house to  
23 Jeffrey, if you know?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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2 A. I know nothing about that  
3 transaction.

4 Q. Can you list for me all the girls  
5 that you have met and brought to Jeffrey  
6 Epstein's house that were under the age of  
7 18?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. I could only recall my family  
11 members that were there and I could not make  
12 a list of anyone else because that list -- it  
13 never happened that I can think of.

14 Q. I'm talking about the time you were  
15 working for Jeffrey Epstein, can you list all  
16 girls that you found for Jeffrey Epstein that  
17 were under the age of 18 to come work for him  
18 in any capacity?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I didn't find the girls.

22 Q. You choose the word.

23 MR. PAGLIUCA: If you have a  
24 question ask it, you don't choose the  
25 word.



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2 Q. List all of the girls you met and  
3 brought to Jeffrey Epstein's home for the  
4 purposes of employment that were under the  
5 age of 18?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. I've already characterized my job  
9 was to find people, adults, professional  
10 people to do the jobs I listed before; pool  
11 person, secretary, house person, chef, pilot,  
12 architect.

13 Q. I'm asking about individuals under  
14 the age of 18, not adult persons, people  
15 under the age of 18.

16 A. I looked for people or tried to  
17 find people to fill professional jobs in  
18 professional situations.

19 Q. So Virginia Roberts was under the  
20 age of 18, correct?

21 A. I think we've established that  
22 Virginia was 17.

23 Q. Is she the -- sorry, go ahead.

24 Is she the only individual that you  
25 met for purposes of hiring someone for

1 G Maxwell - Confidential

2 Jeffrey that was under the age of 18?

3 MR. PAGLIUCA: Objection to form  
4 and foundation. Mischaracterizes her  
5 testimony.

6 A. I didn't hire people.

7 Q. I said met.

8 A. I interviewed people for jobs for  
9 professional things and I am not aware of  
10 anyone aside from now Virginia who clearly  
11 was a masseuse aged 17 but that's, at least  
12 that's how far we know that I can think of  
13 that fulfilled any professional capacity for  
14 Jeffrey.

15 Q. List all the people under the age  
16 of 18 that you interacted with at any of  
17 Jeffrey's properties?

18 A. I'm not aware of anybody that I  
19 interacted with, other than obviously  
20 Virginia who was 17 at this point?

21 (Maxwell Exhibit 21, email, marked  
22 for identification.)

23 Q. I'm showing you what's been marked  
24 as Maxwell 21, it's an email dated January  
25 21, 2015 from Jeffrey to you. Is that, you

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2 can take a moment to take a look at it, is  
3 that a statement that Jeffrey Epstein wrote  
4 for you to be issued to the press?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. The question was?

8 Q. Is this a statement that Jeffrey  
9 Epstein wrote for you to be issued to the  
10 press?

11 MR. PAGLIUCA: Same objection.

12 A. Is there any other emails that you  
13 have that surround this that would allow me  
14 to know what -- does this have a context?

15 Q. These were produced by your counsel  
16 so the to extent there are emails that  
17 surround this, this is what we were given.

18 A. Okay. I don't know whether he  
19 wrote this -- obviously he wrote this and  
20 sent this to me. I don't know if this is  
21 post a phone call we had, I can't recollect  
22 exactly.

23 Q. Do you know if this was issued to  
24 the press, this statement?

25 A. The only press statement that was

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2 issued is the one that you have.

3 Q. When the paragraph refers to you  
4 being in a very long term committed  
5 relationship with another man, who was that  
6 other man?

7 MR. PAGLIUCA: You don't have to  
8 answer the question.

9 MS. McCAWLEY: I'm asking the  
10 identity of a witness in a statement she  
11 is giving.

12 MR. PAGLIUCA: She didn't give the  
13 statement.

14 MS. McCAWLEY: Jeffrey is writing  
15 to her, I'm asking who is he is  
16 referencing to a long term relationship.

17 You are going to refuse to let her  
18 answer that question.

19 MR. PAGLIUCA: Yes.

20 MS. McCAWLEY: I would like to  
21 state for the record he is refusing to  
22 allow her to identify a potential  
23 witness in this litigation. So we will  
24 be back to get the answer to that  
25 question.

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2 Q. Do you recall when you were  
3 traveling with Virginia Roberts that you  
4 would be responsible for holding her  
5 passport?

6 MR. PAGLIUCA: Objection to the  
7 form and foundation.

8 A. I already testified I don't recall  
9 traveling with Virginia.

10 Q. Do you recall whether Jeffrey  
11 Epstein when he was traveling with a minor,  
12 someone under the age of 18, someone would  
13 hold their passport?

14 MR. PAGLIUCA: Object to the form.

15 A. I couldn't testify to what Jeffrey  
16 did or didn't do.

17 Q. You never observed him gathering a  
18 minor's passport and holding it during one of  
19 the trips you were on?

20 A. I don't have a recollection of  
21 that.

22 Q. Are you familiar with a company  
23 called Hyperion Air Inc.?

24 A. I am.

25 Q. Is that a company you are

1 G Maxwell - Confidential

2 affiliated with?

3 A. No.

4 Q. Is that a company that Jeffrey  
5 owns?

6 A. I knew it back in 2001, back when I  
7 was working. I have no idea what that is  
8 today.

9 Q. What about JEGE, are you familiar  
10 with that company, JEGE Inc.?

11 A. I don't recall it.

12 Q. You don't recall?

13 A. It vaguely rings a bell. I don't  
14 remember what it relates to.

15 Q. What about J Epstein Virgin Islands  
16 Foundation, Inc.

17 Are you familiar with that company?

18 A. No.

19 Q. How did J Epstein & Company, Inc.?

20 A. Again, I don't recall his business  
21 names and affiliations.

22 Q. How about NES LLC, are you familiar  
23 with that name?

24 A. Again, I think that was one of his  
25 businesses, but I don't recall.

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2 Q. Do you know what that business did?

3 A. I don't.

4 Q. How about New York Strategy Group  
5 Inc.?

6 A. I don't know.

7 Q. What about Ghislaine Maxwell  
8 Company, are you familiar with that company?

9 A. I never heard of that.

10 Q. Is that a company you are on record  
11 as being either a board member of or having a  
12 position of authority in?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. I've never heard of the business.

16 Q. What negative, unflattering,  
17 private or potentially embarrassing  
18 information does Jeffrey Epstein know about  
19 you?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. I imagine none.

23 Q. Does he know, does he have any  
24 knowledge of any illegal activity that you've  
25 conducted?

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2 MR. PAGLIUCA: Object to the form  
3 and foundation.

4 A. If you want to ask Jeffrey  
5 questions about me, you would have to ask  
6 him.

7 Q. Have you ever been involved in any  
8 illegal activity in your lifetime?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I can't think of anything I have  
12 done that is illegal.

13 Q. Have you ever been arrested?

14 A. I have a DUI in the U.K. a long  
15 time ago.

16 Q. Is that the only arrest you have on  
17 your record?

18 A. Yes.

19 Q. I will mark as Maxwell 22 this  
20 email?

21 (Maxwell Exhibit 22, email, marked  
22 for identification.)

23 Q. This is dated January 21, 2015.  
24 It's from Jeffrey Epstein to you, forwarding  
25 the Guardian and I would like you to look at



1                   G Maxwell - Confidential  
2       the chain of emails so you understand the --  
3       have an appreciation for who is on this.  
4       It's a three-page document. The bottom of  
5       the email appears to be a message from, there  
6       is a -- at the very bottom there is the  
7       signature block for Ross Gow, who I  
8       understand is your press agent and above that  
9       there is a message from a John Swaine to Ross  
10      Gow.

11                   Do you see that?

12           A.     Uh-huh.

13           Q.     Do you know who John Swaine is?

14           A.     I do not.

15           Q.     Above that there is a message from  
16      Ross Gow to Philip Barden and you and it  
17      says, so this isn't getting better, latest  
18      from our chums at the Guardian and above that  
19      you will see on January 21 an email from you  
20      where you wrote, See below.

21                   And right above that chain you will  
22      see Jeffrey Epstein to you on January 21 and  
23      his statement to you is, This will now end  
24      but I think a dismissive statement is okay.

25                   What did he mean by his statement,

1 G Maxwell - Confidential

2 This will now end?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. I have no idea.

6 Q. Did you discuss with him what he  
7 meant by the statement, This will now end?

8 A. I don't recall.

9 Q. Was he taking any action to ensure  
10 that, quote, this will now end?

11 A. I have no idea.

12 (Maxwell Exhibit 23, email, marked  
13 for identification.)

14 Q. This is an email from, if you look  
15 at the chain at the top, you will see it's  
16 from you to Jeffrey on January 27 and the  
17 email at the bottom of the chain is from  
18 Jeffrey to you on January 27.

19 He states, What happened to you and  
20 your statement, question mark, question mark.  
21 And you put at the top, I have not decided  
22 what to do.

23 A. Uh-huh.

24 Q. Why was Jeffrey interested in you  
25 making a statement to the press?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I don't know that he was  
5 interested. We made a statement and then I  
6 was being advised to make an additional  
7 statement and I never did.

8 Q. Was Jeffrey communicating with you  
9 regularly on what additional statement you  
10 might make?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. No, I've communicated with him very  
14 little, as little as possible.

15 Q. Why did you feel you had to keep  
16 him informed of statements you were making to  
17 the press?

18 MR. PAGLIUCA: Objection to the  
19 form and foundation.

20 A. I didn't feel I had to.

21 Q. Then why you were communicating  
22 with him about statements you were making to  
23 the press?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

1 G Maxwell - Confidential

2 A. Insofar as this is the case, it's  
3 really all about Jeffrey, it's not a case  
4 about me.

5 Q. In 2009, did you direct your  
6 lawyer, either directly or indirectly, to  
7 tell Brad Edwards that you were unavailable  
8 to attend a deposition?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation. And this is a  
11 privileged communication as I understand  
12 the question, what someone said or  
13 didn't say to their lawyer. So don't  
14 answer the question.

15 Q. Can you answer that question  
16 without revealing a privileged communication?

17 A. Can you ask the question again?

18 Q. In 2009, did you direct your lawyer  
19 to tell Brad Edwards that you were  
20 unavailable to attend a deposition?

21 MR. PAGLIUCA: Same instruction.

22 Q. Did you make any statement in 2009  
23 to anybody that you were unavailable to  
24 attend a deposition?

25 A. My mother was sick and I don't

1 G Maxwell - Confidential  
2 recall exactly the sequence of events but  
3 what sequence of events do exist are -- was  
4 handled by my lawyers.

5 Q. What is your understanding of  
6 Jeffrey Epstein's nonprosecution agreement?

7 A. I have no idea.

8 Q. Do you have an understanding of the  
9 co-conspirators listed in the nonprosecution  
10 agreement?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I have no knowledge of his  
14 agreement, whatever that is.

15 Q. Do you know, you mentioned earlier  
16 today that Sarah Kellen was one of the listed  
17 co-conspirators.

18 Do you know who the other  
19 co-conspirators are in the nonprosecution  
20 agreement?

21 MR. PAGLIUCA: Objection to the  
22 form and foundation.

23 A. I do not know.

24 Q. What did Jeffrey Epstein tell you  
25 about the nonprosecution agreement?

1 G Maxwell - Confidential

2 A. I don't think I've ever discussed  
3 it with him.

4 Q. How did you come to learn that  
5 Sarah Kellen was covered by the  
6 nonprosecution agreement?

7 A. I believe I read it in the press.

8 Q. Did you have any discussions with  
9 Sarah Kellen with about the nonprosecution  
10 agreement?

11 A. I have not had any discussions with  
12 Sarah.

13 Q. When is the last time you spoke to  
14 Sarah Kellen?

15 A. Maybe 2005, 2006 maybe.

16 Q. And same with Nadia Marcinkova,  
17 when is the last time you recall speaking  
18 with Nadia Marcinkova?

19 A. Probably even more time before  
20 that, maybe -- I've never had communications  
21 really with Nadia.

22 Q. I'm sorry, I didn't hear that.

23 A. I never had communications with  
24 her.

25 Q. You were working for Jeffrey at the

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2 same time Nadia was also working for Jeffrey,  
3 isn't that correct?

4 A. I didn't know what Nadia did for  
5 Jeffrey so I didn't characterize what her  
6 relationship or work or not was and I was  
7 still helping him with his construction  
8 projects and the like but I never crossed  
9 paths with Nadia.

10 Q. What did you think Nadia was doing  
11 for Jeffrey?

12 A. I have no idea what Nadia was doing  
13 for Jeffrey.

14 Q. Did you observe Nadia at any of  
15 Jeffrey's houses while you were there?

16 A. She was at the house on occasion.

17 Q. What would she be doing there?

18 A. I have no idea.

19 Q. Did you know if she lived at his  
20 houses?

21 A. I have no idea.

22 Q. Did you ever go into a bedroom and  
23 see her belongings at one of the houses?

24 A. Not that I recall, no.

25 Q. I'm going to mark this as Maxwell

1 G Maxwell - Confidential

2 Exhibit 24?

3 (Maxwell Exhibit 24, email, marked  
4 for identification.)

5 Q. You can see at the top of the first  
6 page which is GM 0001, it's dated January 3,  
7 2015 from you to the Duke of York.

8 Is that Prince Andrew who we  
9 referred to today?

10 A. Yes.

11 Q. And can you tell me, it says, Have  
12 some info. Call me when you have a moment.

13 What is redacted there?

14 A. I don't recall, I'm sorry.

15 Q. Do you know why there is a  
16 redaction on this document?

17 A. You would have to confer with my  
18 lawyers.

19 Q. What did you discuss on that call?

20 A. I don't have any specific knowledge  
21 of that call.

22 Q. So the call is being made on  
23 Saturday, January 3, 2015?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation.



1 G Maxwell - Confidential

2 Q. The document states, it's Saturday  
3 January 3, 2015. You issued your press  
4 release on January 2, 2015.

5 Were you discussing with Prince  
6 Andrew the subject of Virginia Roberts during  
7 these calls?

8 MR. PAGLIUCA: Objection to the  
9 form and foundation.

10 A. I don't know if I spoke to him.

11 Q. I would like you to turn to GM 0002  
12 and the bottom chain says Duke of York,  
13 Saturday January 3, to [REDACTED] re, and he says  
14 let me know when we can talk. Got some  
15 specific questions to ask you about Virginia  
16 Roberts.

17 Do you recall having a conversation  
18 with Prince Andrew about Virginia Roberts in  
19 or around early January of 2015?

20 A. I don't know if we actually spoke.

21 Q. Did you ever speak to Prince Andrew  
22 about Virginia Roberts after you issued your  
23 statement on January 2, 2015?

24 A. I know that we did speak at some  
25 point but I don't recollect when we spoke.

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2 Q. What did you talk about?

3 A. Just what a liar she is.

4 Q. What did he say to you?

5 A. What a liar she is.

6 Q. Did he tell you why he thought she  
7 was a liar?

8 A. I don't think he told me why she  
9 was a liar. The substance of everything that  
10 she said was a lie with regard to him.

11 Q. What did you say to him?

12 A. She is a liar.

13 Q. That was the whole conversation, it  
14 was you said to him, she is a liar and he  
15 said to you she say liar and did you discuss  
16 any of the details about what those lies  
17 were?

18 A. I don't recollect.

19 Q. Was that only one conversation you  
20 had?

21 A. I don't recollect. I don't  
22 recollect actually the conversation but other  
23 than -- in detail other than we both said she  
24 was a liar.

25 Q. Do you regularly communicate with

1 G Maxwell - Confidential

2 Prince Andrew?

3 MR. PAGLIUCA: Objection to the  
4 form and foundation.

5 A. What do you mean by regularly.

6 Q. Do you email with him once a month,  
7 once every two months or text him or call  
8 him?

9 A. No, we are not in that type of  
10 regular touch.

11 Q. Do you travel with him regularly?

12 A. I don't know, I have traveled with  
13 him. We have traveled together but regularly  
14 is not a correct characterization.

15 Q. Do you travel with him more than  
16 once a year?

17 A. There is no standard. There is no  
18 set pattern. The answer to that was no.

19 Q. Have you ever observed him with any  
20 underage, any women, female under the age of  
21 18, interacting, that's not a child or a  
22 family friend, interacting for the purposes  
23 of a sexual relationship with that  
24 individual?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I've never seen Andrew interact in  
4 any way of that nature.

5 Q. Have you ever gone to dinner with  
6 him with any individual under the age of 18  
7 that's not a family member or friend of yours  
8 that is under the age of 18?

9 MR. PAGLIUCA: Objection to form  
10 and foundation.

11 A. We've been to dinner all the time,  
12 I am not not sure who is at dinner with us, I  
13 can't testify to that.

14 Q. Has he ever brought a female under  
15 the age 18 that's not a relative of his --

16 A. He has children.

17 Q. I said not relatives.

18 A. I can't possibly testify to who he  
19 comes to dinner with, I wouldn't recall.

20 Q. To your knowledge, has he ever had  
21 a relationship with any female under the age  
22 of 18 for purposes of a romantic relationship  
23 to your knowledge?

24 A. I can't testify to Andrew's  
25 relationship.

1 G Maxwell - Confidential

2 Q. You haven't observed that?

3 A. No.

4 Q. Have you talked to Prince Andrew  
5 about coming to testify at trial in this  
6 case?

7 A. No.

8 Q. When was the last time you  
9 communicated with Leslie Wexner?

10 A. 1994, 1995.

11 Q. I believe earlier, did you say that  
12 you -- when is the last time you've been to  
13 his home in Ohio?

14 A. I said -- you asked me if I stayed  
15 the night.

16 Q. I'm asking you a different  
17 question. When is the last time you have  
18 been to his home in Ohio?

19 A. Roughly the same time, in the  
20 middle of the '90s sometime, mid '90s.

21 Q. Not in the years 2000 to 2002?

22 A. Mid '90s.

23 Q. Have you ever communicated with any  
24 representative of Leslie Wexner?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I mean I've been to his -- in the  
4 mid '90s, I would have communicated with  
5 people who worked for him.

6 Q. Have you communicated with Leslie  
7 Wexner about this case?

8 A. No.

9 Q. Have you ever seen a topless female  
10 at any one of Jeffrey Epstein's properties?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation. You've asked this  
13 question, by the way, earlier on today.

14 A. Again, I testified that there are  
15 people who from time to time in the privacy  
16 of a swimming pool have maybe taken a bikini  
17 top off or something but it's not common and  
18 certainly when I was at the house I don't  
19 really recollect seeing that kind of  
20 activity.

21 Q. Have you ever smoked cigarettes?

22 A. Yes.

23 Q. Have you ever smoked cigarettes  
24 with Virginia Roberts?

25 A. I don't recall smoking cigarettes

1 G Maxwell - Confidential

2 with Virginia Roberts.

3 Q. I'm marking this as Maxwell 25.

4 (Maxwell Exhibit 25, email, marked  
5 for identification.)

6 Q. I'm showing you what has been  
7 marked as Maxwell 25.

8 This is an email dated January 11,  
9 2015 at the top?

10 Do you see that that from Jeffrey  
11 to you?

12 A. Uh-huh.

13 Q. And then below there is an email  
14 from Philip Barden to you and cc'ing Ross Gow  
15 on January 11, 2015.

16 Do you see that?

17 A. Uh-huh.

18 Q. It says, Dear Ghislaine, as you  
19 know I have been working behind the scenes  
20 and this article comes from that. It helps  
21 but doesn't answer the VR claims. I will get  
22 the criminal allegations out. This shows the  
23 MOS will print truth, not just a VR voice  
24 piece. We can only make the truth by making  
25 a statement.

1 G Maxwell - Confidential

2 What did he mean when he said, I  
3 will get the criminal allegations out, what  
4 was he referring to?

5 MR. PAGLIUCA: Objection to the  
6 form and foundation.

7 A. I have no idea.

8 Q. Were there criminal allegations  
9 about Virginia that either your lawyer or  
10 press agent were leaking to the press?

11 MR. PAGLIUCA: Objection to form  
12 and foundation.

13 A. I have no idea.

14 Q. Did you ask him what he meant when  
15 he said, I will get the criminal allegations  
16 out?

17 A. I don't recollect the conversation.

18 Q. Did you direct him to leak to the  
19 press criminal allegations about Virginia  
20 Roberts?

21 A. I already testified that I have no  
22 knowledge of what you are asking me.

23 Q. Were you copied on this email,  
24 correct?

25 A. I was.



1 G Maxwell - Confidential

2 Q. Did Jeffrey Epstein assist in  
3 obtaining information about criminal  
4 allegations relating to Virginia Roberts?

5 MR. PAGLIUCA: Objection to form  
6 and foundation.

7 A. I have no recollection.

8 Q. Did Alan Dershowitz assist in  
9 obtaining information regarding criminal  
10 allegations of Virginia Roberts?

11 MR. PAGLIUCA: Objection to form  
12 and foundation.

13 A. I have no knowledge of that.

14 Q. Did you ever discuss that with Alan  
15 Dershowitz?

16 A. Discuss what?

17 Q. Criminal allegations about Virginia  
18 Roberts.

19 A. I don't believe I have.

20 Q. Have you ever discussed allegations  
21 relating to --

22 Q. Do you know if Jeffrey Epstein had  
23 any relationship with the U.S. government  
24 either working for the CIA or the FBI in his  
25 lifetime?

1 G Maxwell - Confidential

2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I have no knowledge of that.

5 Q. Do you know if Jeffrey Epstein has  
6 any friends that are in the CIA or FBI?

7 MR. PAGLIUCA: Objection to the  
8 form and foundation.

9 A. I have no idea.

10 Q. Are you aware of an investigation  
11 of Jeffrey Epstein in the early '80s relating  
12 to the SEC?

13 MR. PAGLIUCA: Objection to the  
14 form and foundation.

15 A. I have no knowledge of that.

16 Q. Are you aware that Jeffrey Epstein  
17 has told people that he worked for the  
18 government to recover stolen funds?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I don't recall conversations about  
22 that.

23 Q. Has he ever told that you he worked  
24 for the U.S. government?

25 A. I don't recollect that.

1 G Maxwell - Confidential

2 Q. You don't recollect or has he never  
3 told you that?

4 A. I have no knowledge, I don't  
5 recollect him telling me he worked for the  
6 government.

7 Q. Does Jeffrey Epstein have any  
8 affiliation with the Israeli government?

9 MR. PAGLIUCA: Objection to the  
10 form and foundation.

11 A. I have no knowledge of that.

12 Q. Do you know if he ever performed  
13 any work for the Israeli government?

14 A. I have no knowledge of that.

15 Q. Have you ever visited Israel with  
16 Jeffrey Epstein?

17 A. I'm sorry, I don't recollect.

18 Q. You've seen the flight logs that I  
19 provided you today. Are there, during the  
20 time you worked for Jeffrey Epstein, were  
21 there times that you flew on commercial  
22 flights rather than Jeffrey Epstein's planes?

23 A. Yes.

24 Q. How often did that occur?

25 A. Decently.

1 G Maxwell - Confidential

2 Q. Were there other flights that you  
3 recall flying on with Jeffrey Epstein that  
4 were on flights that -- where Dave Rogers was  
5 not the pilot?

6 A. Dave Rogers was not always the  
7 pilot.

8 Q. How many planes did Jeffrey Epstein  
9 have during the time you were with him?

10 MR. PAGLIUCA: Objection to the  
11 form and foundation.

12 A. So you need to give me a date  
13 range.

14 Q. During the time period of 1992  
15 through when you left your employment which I  
16 think you said was in 2009?

17 A. So in the '90s he had one plane and  
18 at some point in the 2000s he had two planes  
19 but I can't testify to anything past 2002,  
20 2003, what happened to his planes after that.

21 Q. Do you know what travel agency, if  
22 any, Jeffrey would use when he would send  
23 someone, for example, you or one of his other  
24 employees on a flight somewhere? Did he use  
25 a particular travel agency to make those

1 G Maxwell - Confidential

2 arrangements?

3 A. I don't recall.

4 Q. Were you ever responsible for  
5 making those arrangements for other  
6 individuals?

7 A. I don't recall making flight  
8 arrangements.

9 Q. Was it a New York travel agent that  
10 you would use for those arrangements?

11 A. Again, we are talking 16, 17, 18  
12 years. I just don't recall anything to do  
13 with travel agents.

14 Q. Would Jeffrey Epstein ever fly, for  
15 example, Sarah Kellen on a commercial flight  
16 to meet you in New Mexico?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. I can't testify to that.

20 Q. Do you recall a trip where you met  
21 Sarah Kellen in New Mexico?

22 A. No, I don't recall any specific  
23 trip, no.

24 Q. Why would you be sent to New  
25 Mexico, is there a reason why you would go

1 G Maxwell - Confidential

2 there in the course of the work you were  
3 doing for Jeffrey?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I was never sent. I had a job to  
7 do and I would have to go to New Mexico for  
8 work.

9 Q. Would Sarah Kellen assist in that  
10 project?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. No. The project was largely  
14 complete, largely complete by the end -- I  
15 don't remember the dates exactly but it was  
16 largely complete by the 1990s, 2000s.

17 Q. Do you know why Sarah Kellen would  
18 be going to New Mexico to meet you?

19 MR. PAGLIUCA: Objection to the  
20 form and foundation.

21 A. I don't know. She worked for  
22 Jeffrey.

23 MR. PAGLIUCA: I think we are out  
24 of time, counsel.

25 THE VIDEOGRAPHER: It's true.

1 G Maxwell - Confidential

2 MS. McCAWLEY: I will state for the  
3 record there were questions today that  
4 remain unanswered because the witness  
5 has been instructed not to answer those  
6 questions and we will be raising our  
7 objections with the court to be able to  
8 have those questions answered in the  
9 near future.

10 MR. PAGLIUCA: So we are clear, we  
11 are designating this entire deposition  
12 as confidential under the protective  
13 order. That would cover the paralegal  
14 whose been present as well as the court  
15 reporter and the videographer and all  
16 the lawyers in the room.

17 THE VIDEOGRAPHER: This concludes  
18 today's proceedings. We are off the  
19 record at 6:43 p.m.

20 (Time noted: 6:43 p.m.)

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I N D E X

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CERTIFICATE

I HEREBY CERTIFY that the witness,  
GHISLAINE MAXWELL, was duly sworn by me and  
that the deposition is a true record of the  
testimony given by the witness.



*Leslie Fagin*  
\_\_\_\_\_

Leslie Fagin,

Registered Professional Reporter

Dated: April 22, 2016

(The foregoing certification of  
this transcript does not apply to any  
reproduction of the same by any means, unless  
under the direct control and/or supervision  
of the certifying reporter.)

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ACKNOWLEDGMENT OF DEPONENT

I, \_\_\_\_\_, do hereby  
certify that I have read the foregoing pages,  
and that the same is a correct transcription  
of the answers given by me to the questions  
therein propounded, except for the  
corrections or changes in form or substance,  
if any, noted in the attached Errata Sheet.

GHISLAINE MAXWELL \_\_\_\_\_ DATE

Subscribed and sworn  
to before me this  
\_\_\_\_\_ day of \_\_\_\_\_, 2016.

My commission expires:

Notary Public

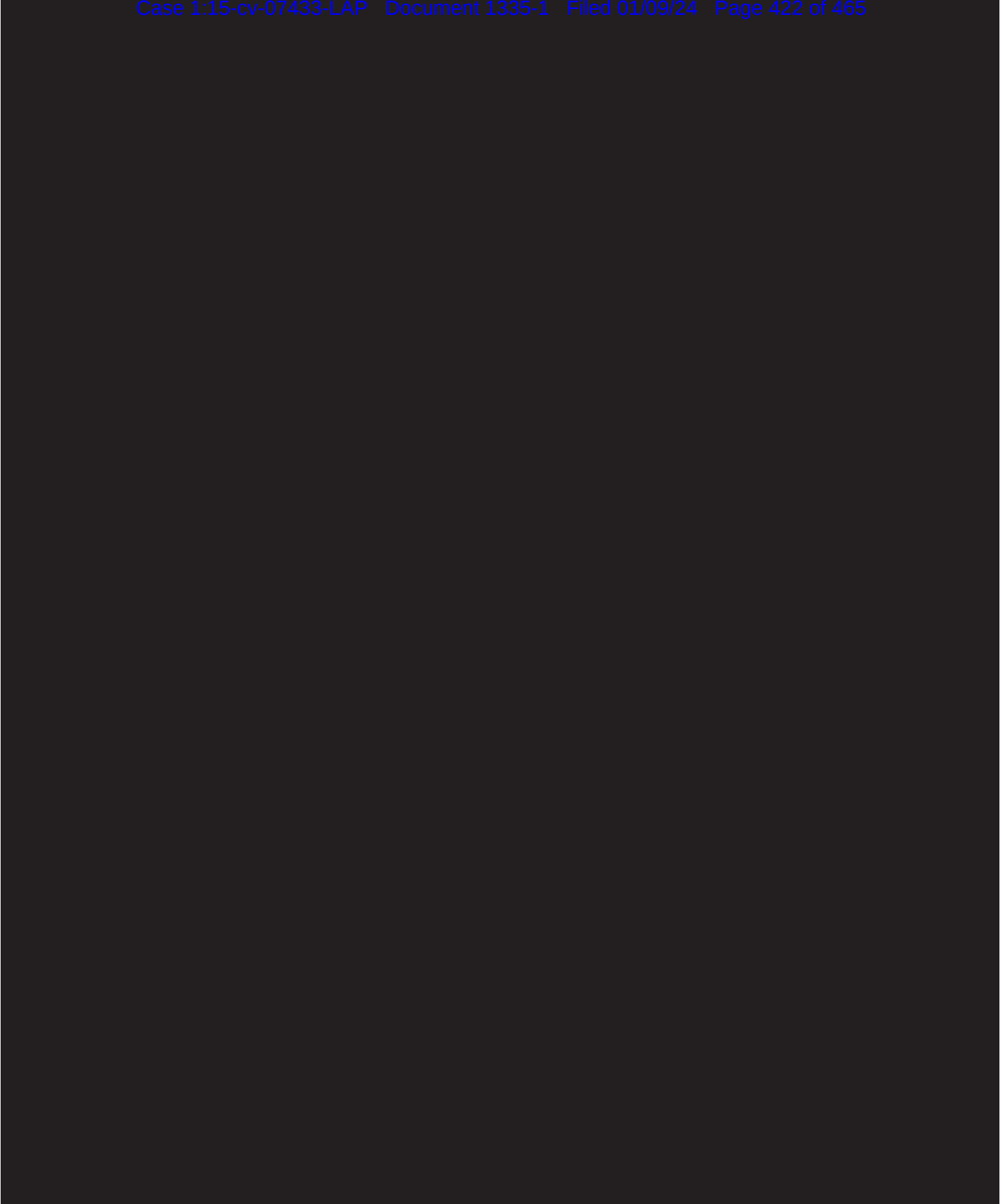
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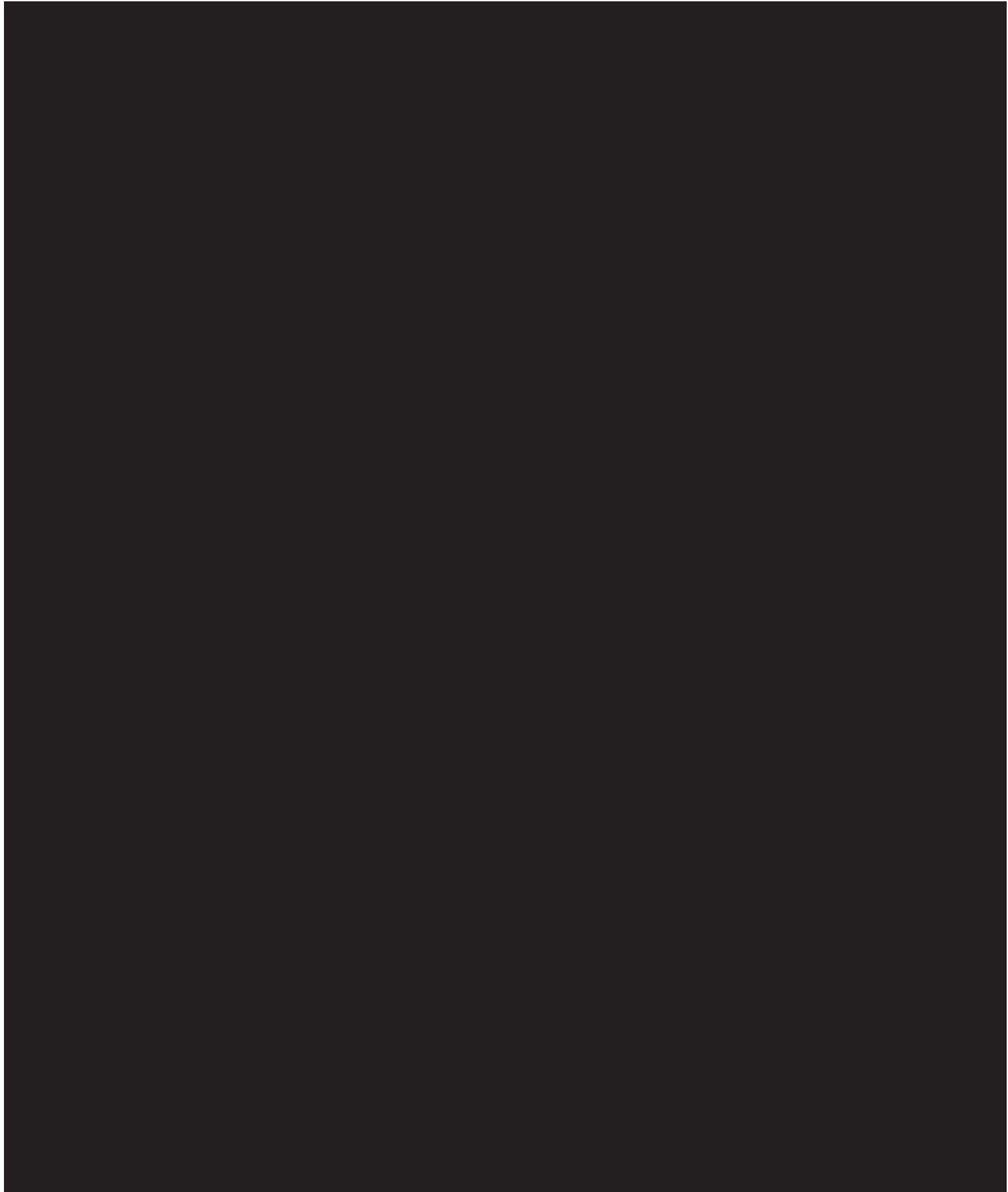




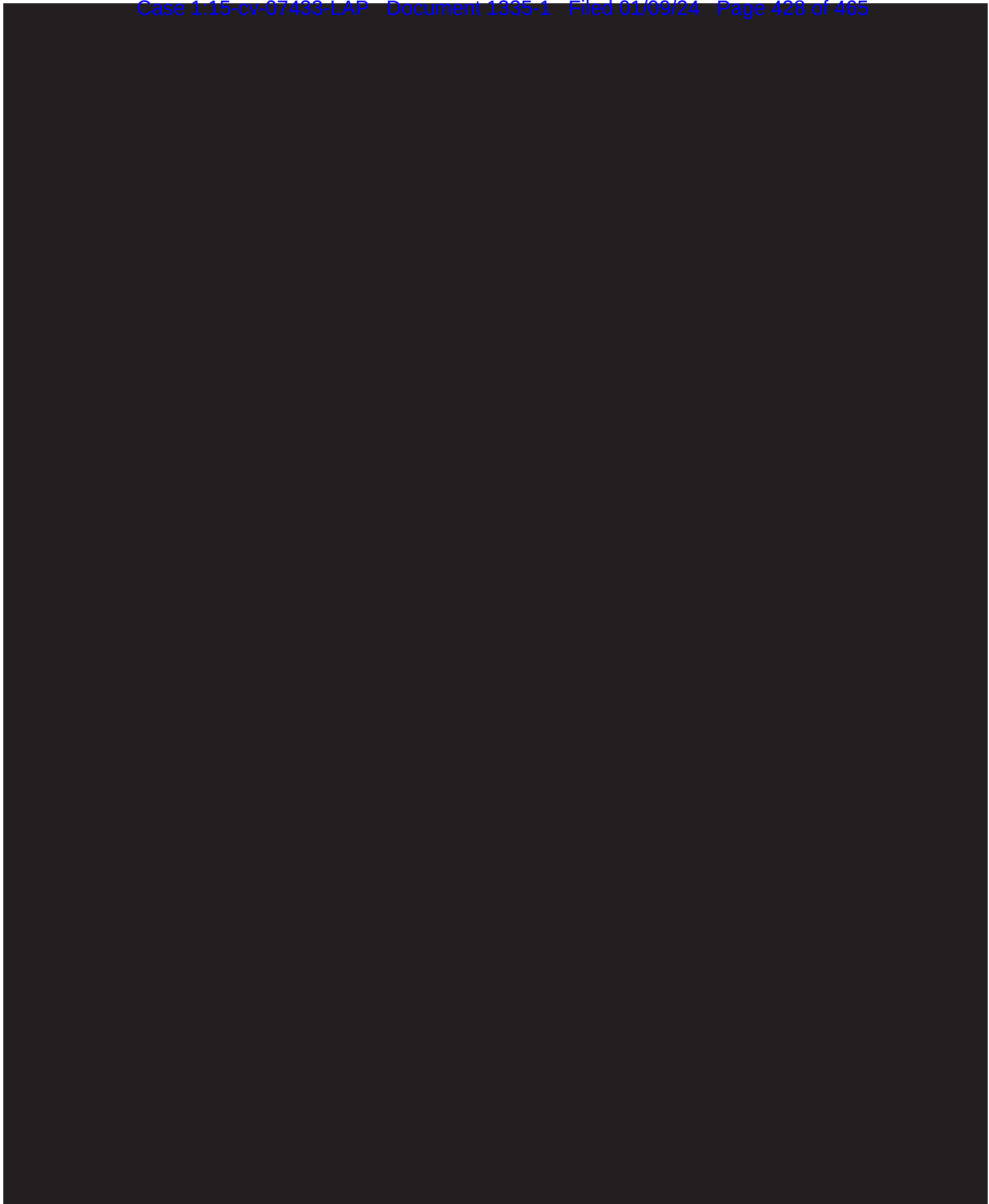






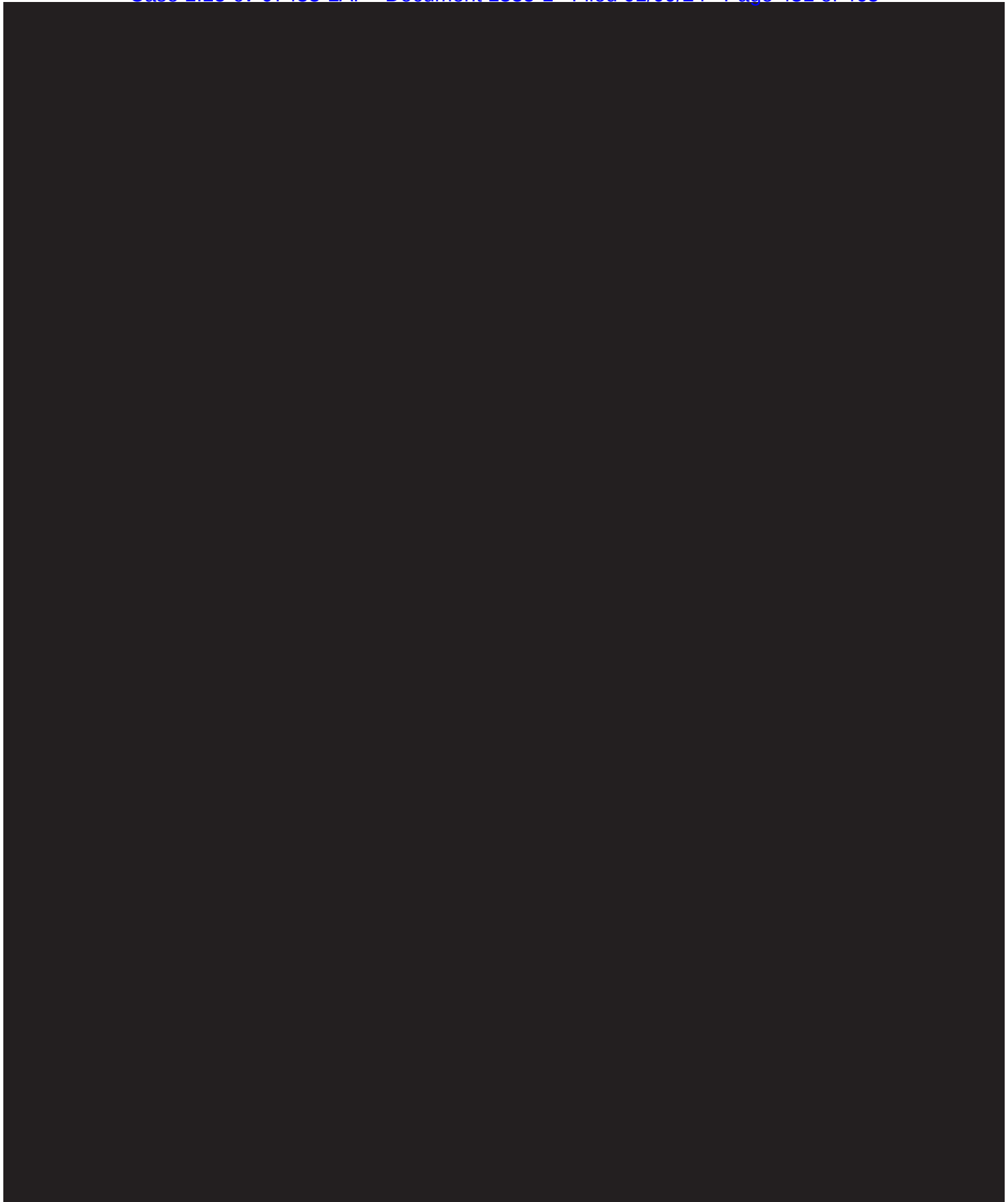








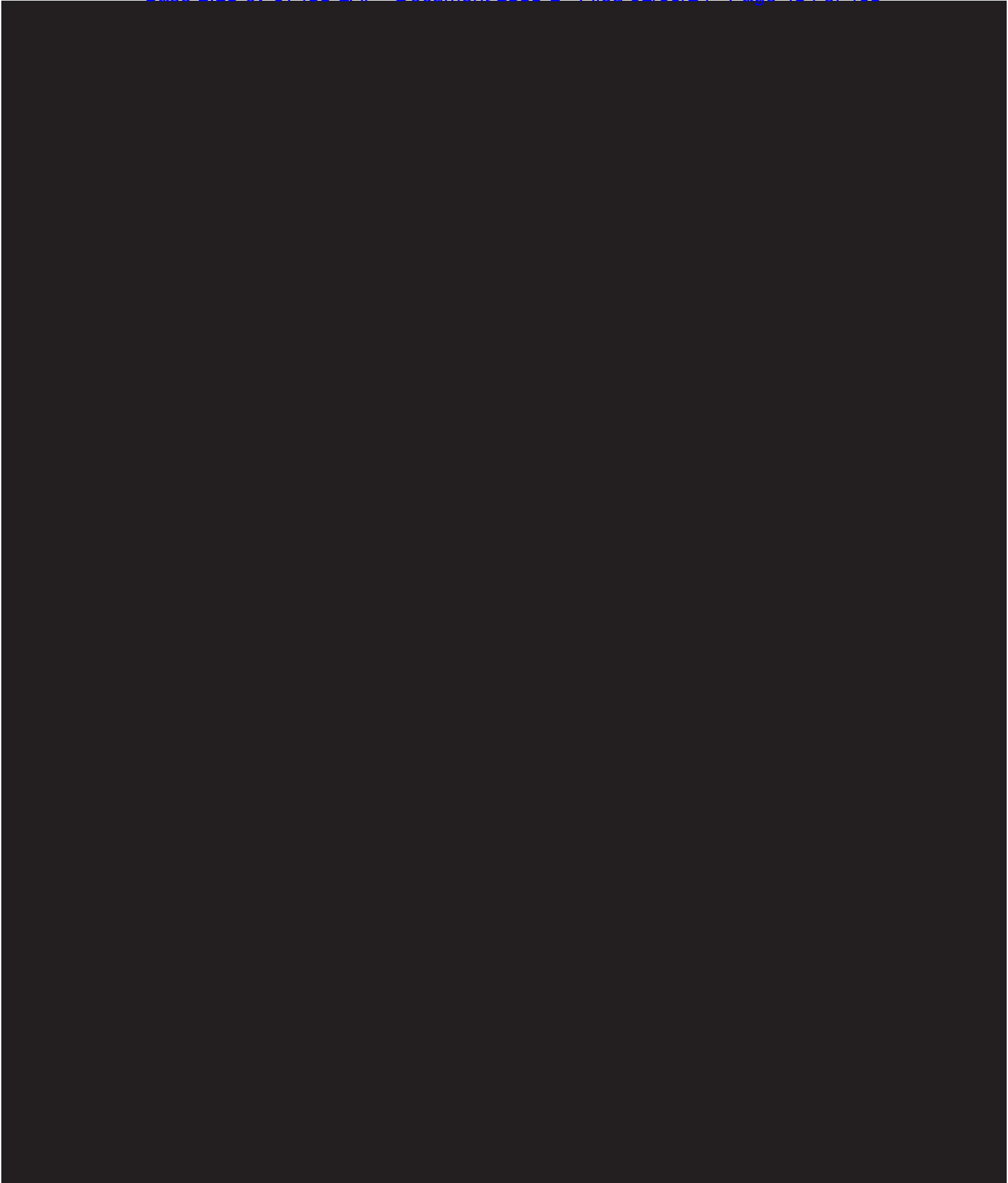


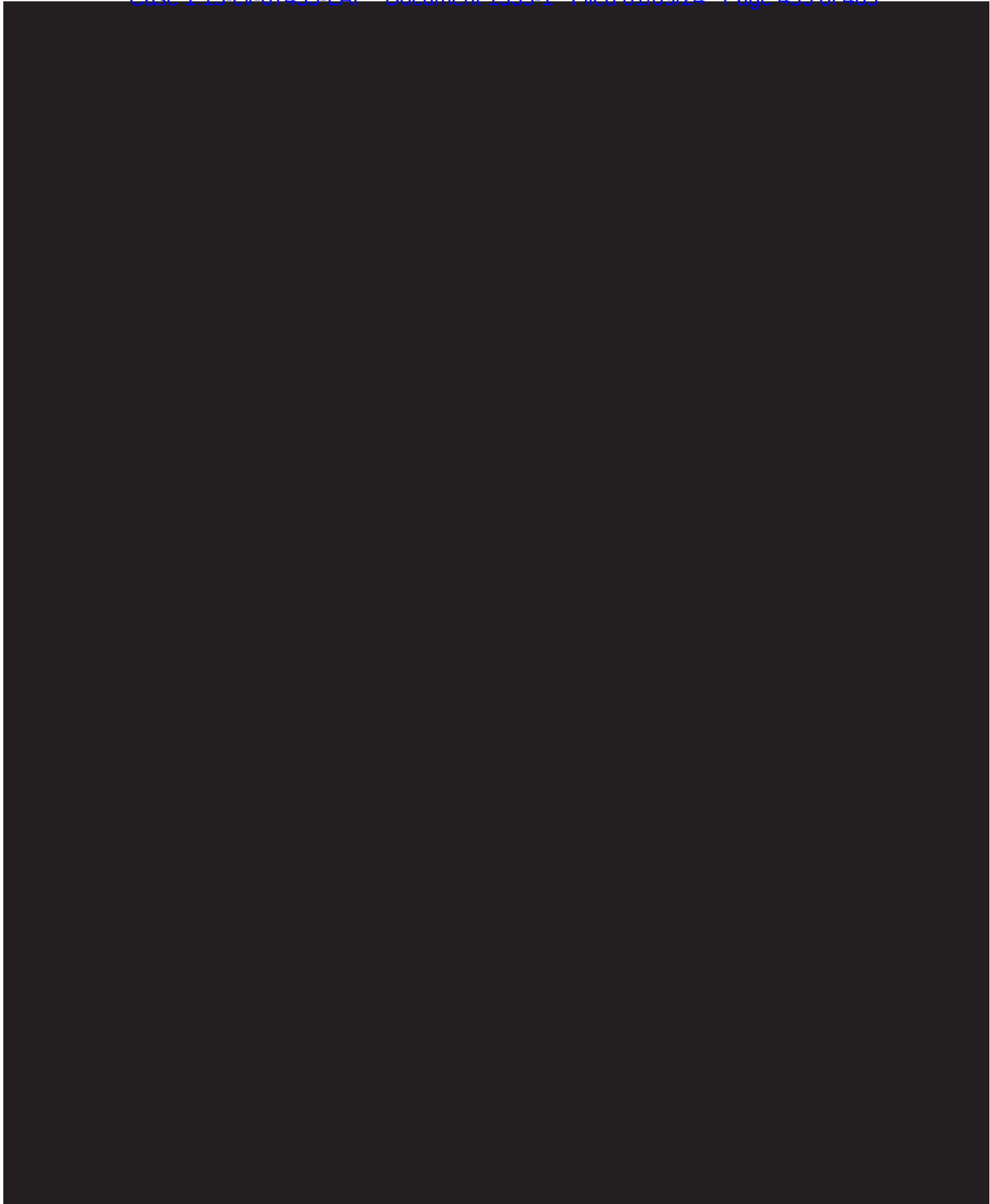




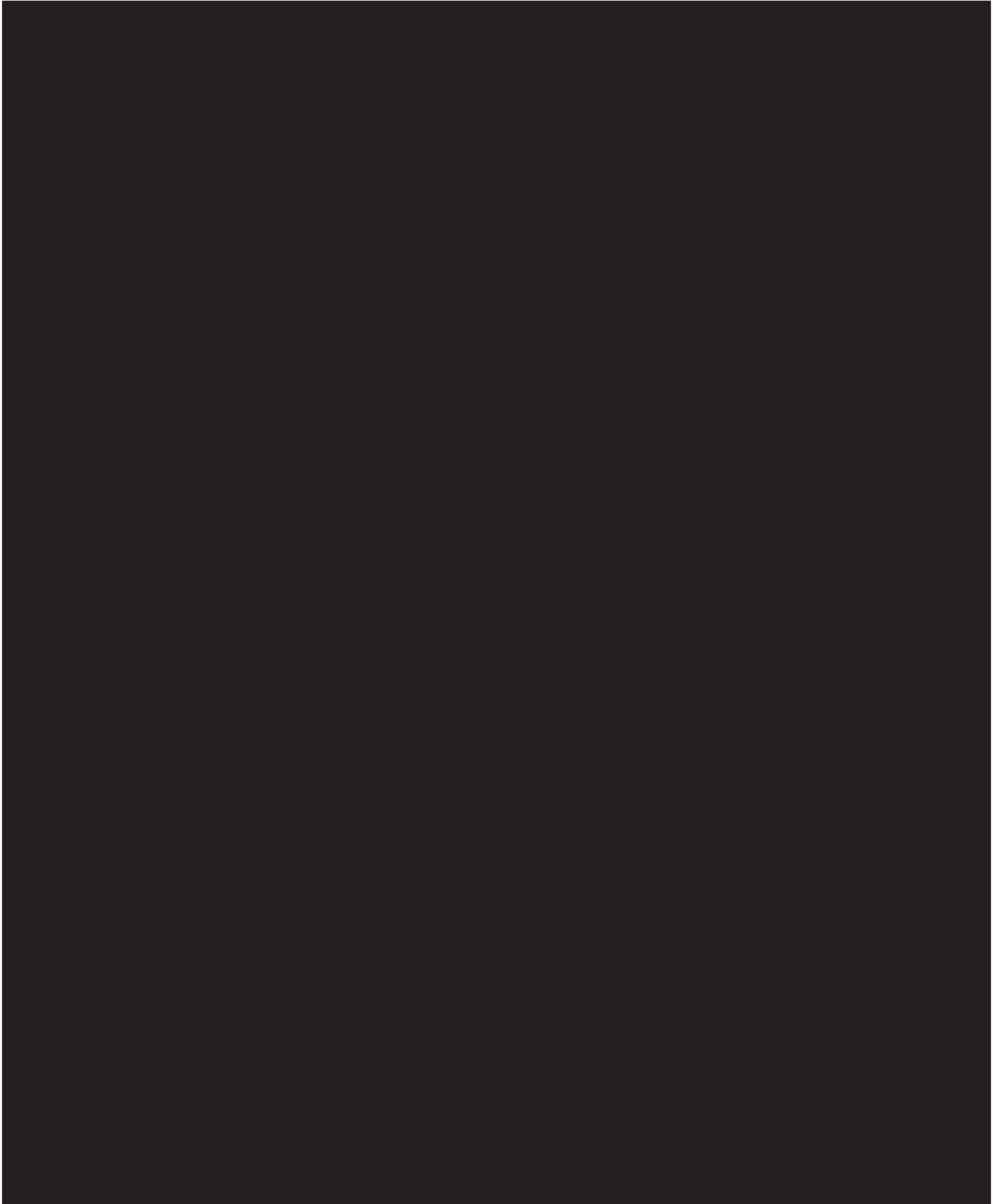










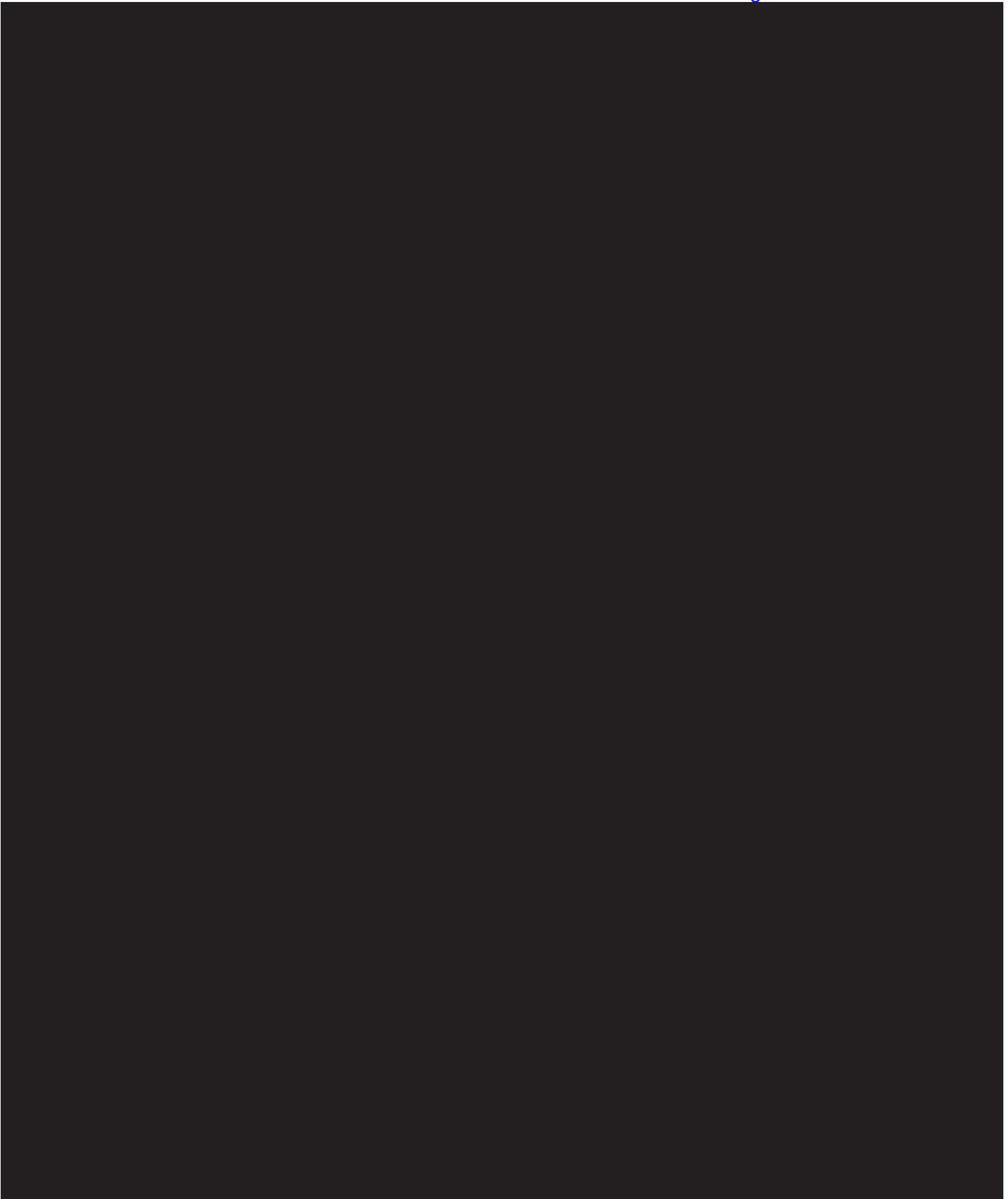








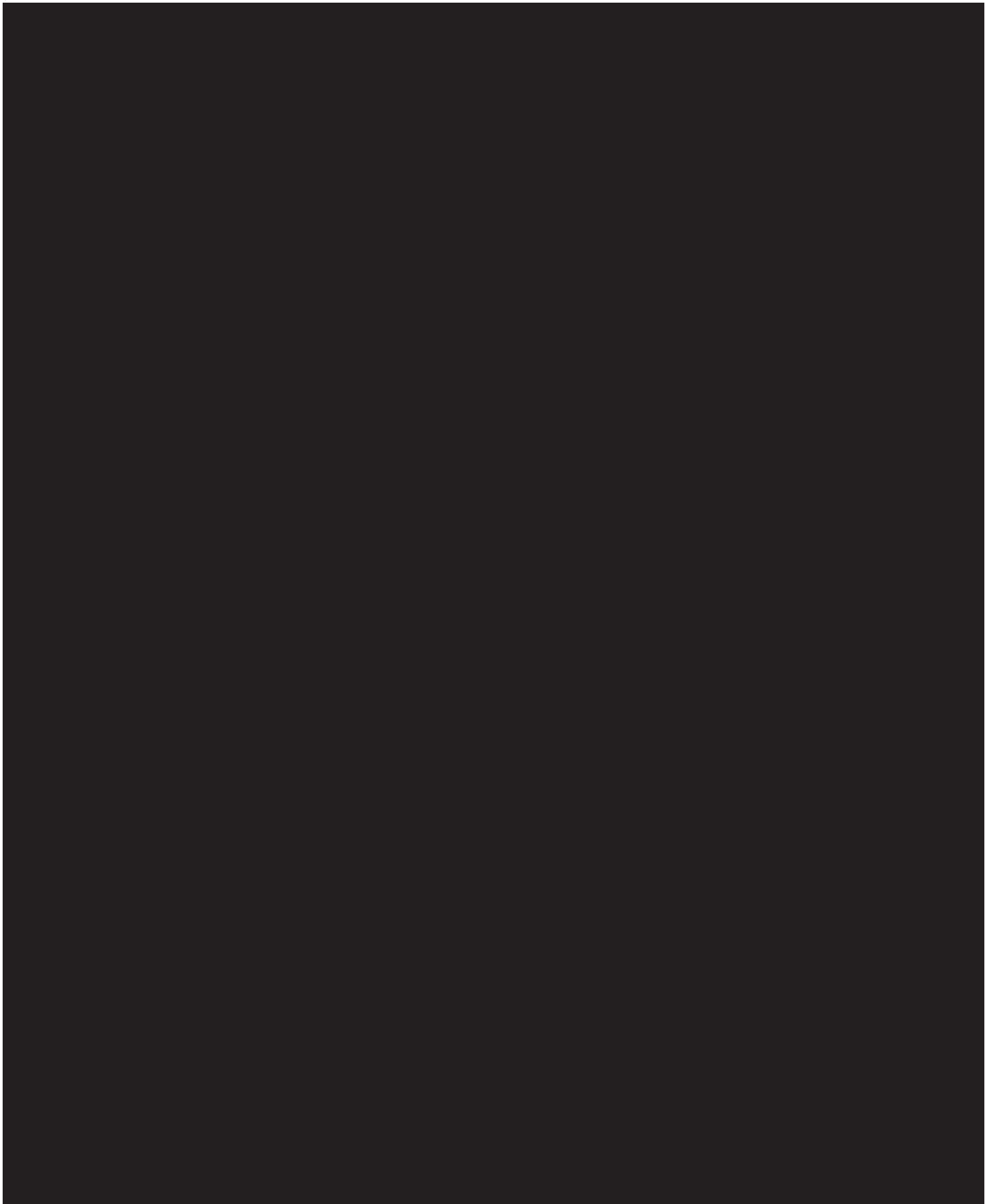


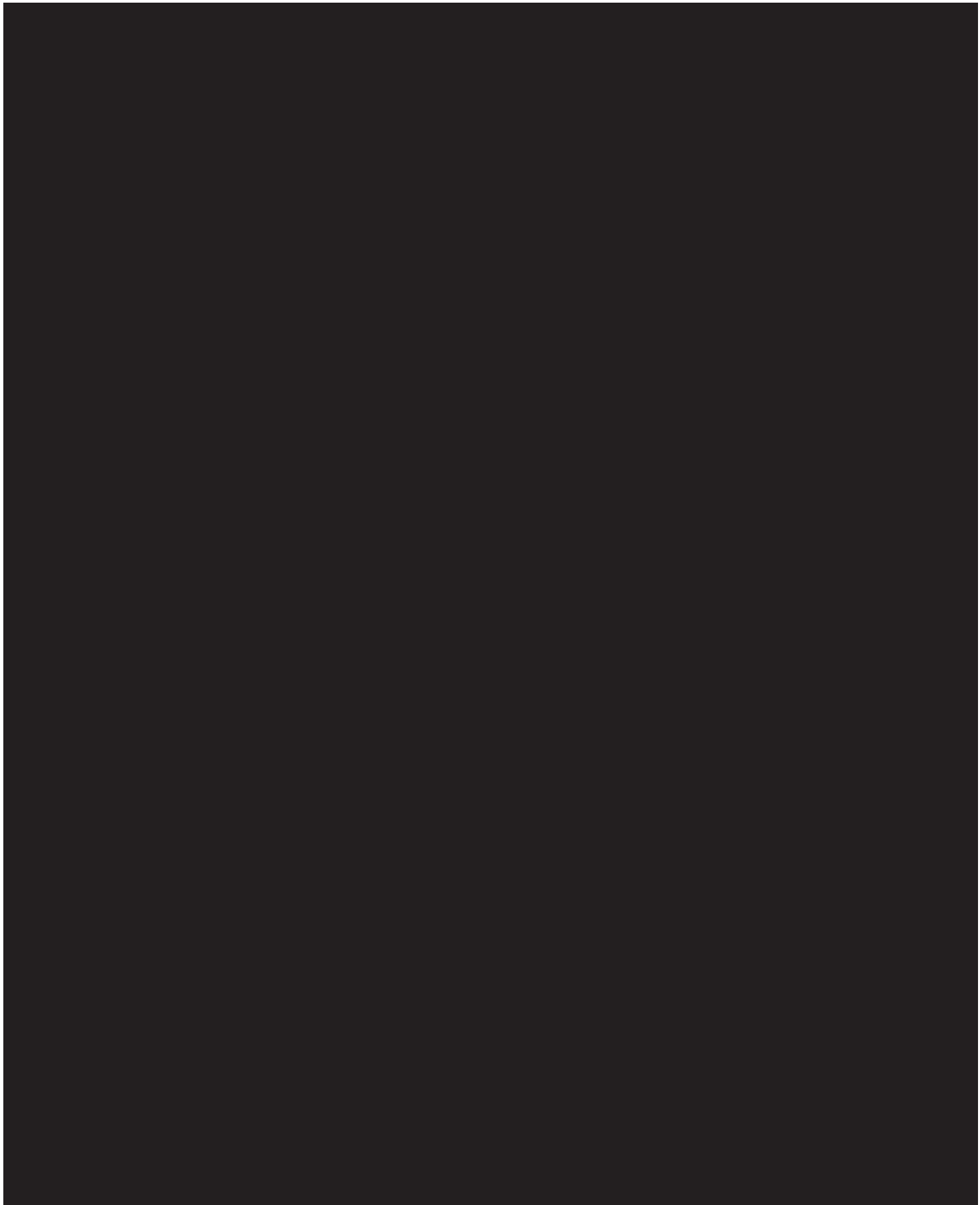
































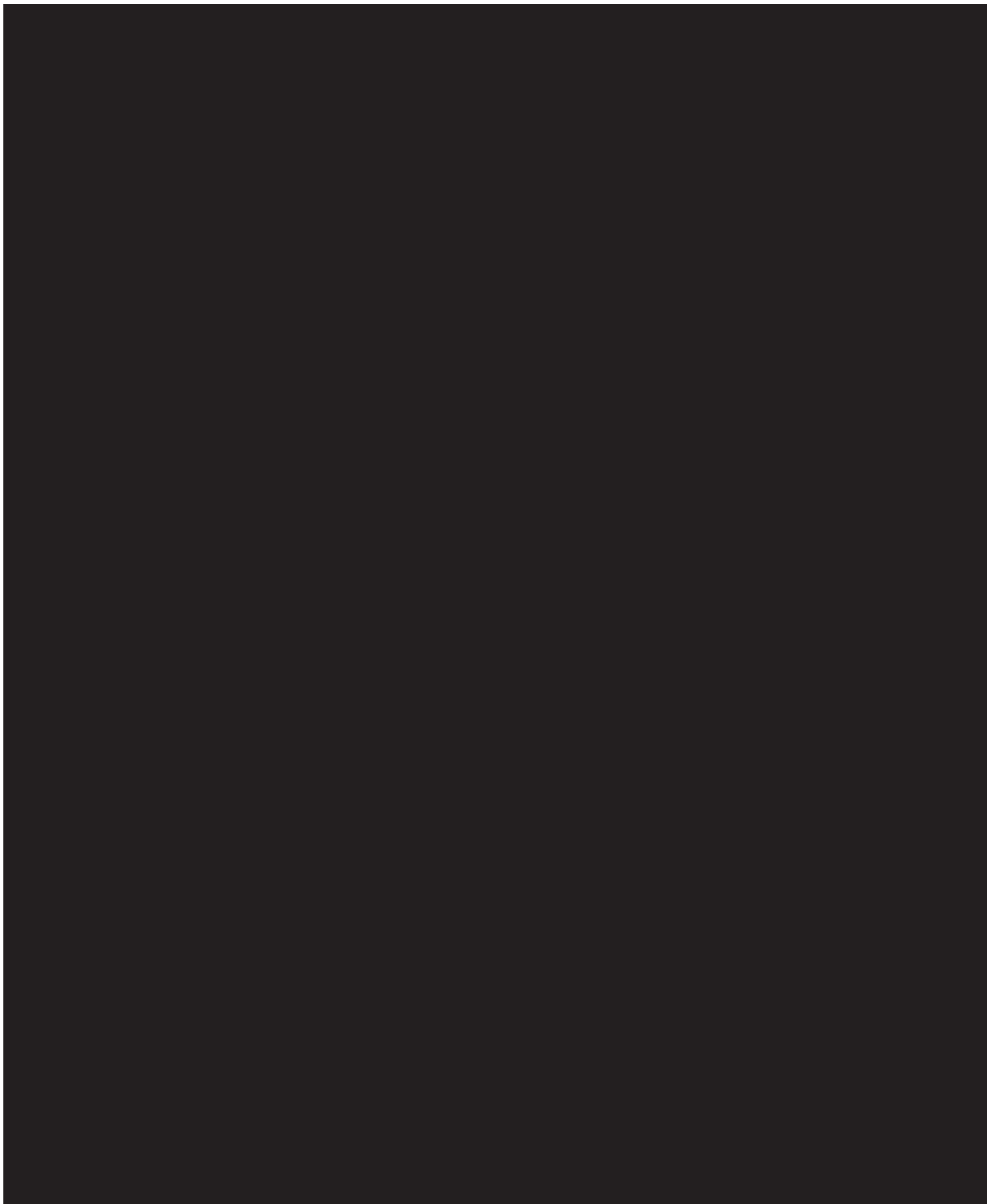
























# **EXHIBIT D**

Confidential

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:  
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

\*\*CONFIDENTIAL\*\*

Continued Videotaped Deposition of  
GHISLAINE MAXWELL, the Defendant herein,  
taken pursuant to subpoena, was held at  
the law offices of Boies, Schiller &  
Flexner, LLP, 575 Lexington Avenue, New  
York, New York, commencing July 22,  
2016, 9:04 a.m., on the above date,  
before Leslie Fagin, a Court Reporter  
and Notary Public in the State of New  
York.

- - -  
MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
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Confidential

Page 2

Page 4

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 Also Present:

1  
 2 MR. EDWARDS: Brad Edwards, also  
 3 representing the plaintiff, Virginia  
 4 Giuffre.  
 5 MR. POTTINGER: Stan Pottinger,  
 6 also representing the plaintiff.  
 7 MR. CASSELL: Paul Cassell, from  
 8 Salt Lake City, Utah, also representing  
 9 Ms. Giuffre.  
 10 MR. PAGLIUCA: Jeff Pagliuca and  
 11 Laura Menninger, on behalf of Ms.  
 12 Maxwell.  
 13 And Ms. McCawley has also entered  
 14 the room, and we have an assistant from  
 15 Boies Schiller from the Fort Lauderdale  
 16 office here today as well today.  
 17 THE VIDEOGRAPHER: Will the court  
 18 reporter please swear in the witness.  
 19 GHISLAINE MAXWELL,  
 20 called as a witness, having been duly  
 21 sworn by a Notary Public, was  
 22 examined and testified as follows:  
 23 EXAMINATION BY  
 24 MR. BOIES:  
 25 Q. Good morning, Ms. Maxwell. [REDACTED]

Page 3

Page 5

1  
 2 THE VIDEOGRAPHER: This is DVD No.  
 3 1, Volume II, of the continued video  
 4 recorded deposition of Ghislaine Maxwell  
 5 in the matter Virginia Giuffre against  
 6 Ghislaine Maxwell, in the United States  
 7 District Court, Southern District of New  
 8 York.  
 9 This deposition is being held at  
 10 575 Lexington Avenue, New York, New  
 11 York, on July 22, 2016 at approximately  
 12 9:04 a.m.  
 13 My name is Rodolfo Duran. I am the  
 14 legal video specialist. The court  
 15 reporter is Leslie Fagin, and we are  
 16 both in association with Magna Legal  
 17 Services.  
 18 Will counsel please introduce  
 19 themselves.  
 20 MR. BOIES: This is David Boies, of  
 21 Boies, Schiller & Flexner, counsel for  
 22 plaintiff.  
 23 MS. SCHULTZ: Meredith Schultz,  
 24 from Boies Schiller & Flexner, counsel  
 25 for plaintiff.

1 G. Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

Confidential

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Page 8

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G. Maxwell - Confidential

[REDACTED]

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2

G. Maxwell - Confidential

[REDACTED]

22  
23  
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25

MR. PAGLIUCA: Object to the form and foundation.

MR. BOIES: Excuse me, counsel.

MR. PAGLIUCA: I'm objecting to

Page 7

Page 9

1  
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3

G. Maxwell - Confidential

[REDACTED]

1  
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10  
11

G. Maxwell - Confidential form and foundation, and I have an opportunity to do that.

MR. BOIES: Yes, you do, but you do not have an opportunity to disrupt the deposition.

MR. PAGLIUCA: Which I'm not.

MR. BOIES: The court will decide that, as the court has decided the issues before.

[REDACTED]

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Page 10

1 G. Maxwell - Confidential  
2 [REDACTED]

Page 12

1 G. Maxwell - Confidential  
2 [REDACTED]

Page 11

1 G. Maxwell - Confidential  
2 [REDACTED]

Page 13

1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 Q. You understand that you are under  
7 oath, correct?  
8 A. I do.  
9 Q. And you understand that the oath  
10 requires you to tell the truth, the whole  
11 truth and nothing but the truth in response  
12 to questions?  
13 MR. PAGLIUCA: Object to the form  
14 and foundation.  
15 Q. Do you?  
16 A. I do understand that.  
17 Q. Do you understand if you fail to do  
18 that, that you could be prosecuted for  
19 perjury?  
20 MR. PAGLIUCA: Object to the form  
21 and foundation.  
22 A. I understood that is what happens  
23 at these events.  
24 Q. And do you understand that if you  
25 say that you do not recall and in fact you do

Confidential

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Page 16

1 G. Maxwell - Confidential  
 2 recall, that would violate your oath?  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 A. If I don't recall, I don't recall.  
 6 It's not a question of whether I'm violating  
 7 my oath or not. I don't know.

1 G. Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]

23 Q. Were you ever on a plane with  
 24 Mr. Epstein when Mr. Epstein had sex with  
 25 anyone?

Page 15

Page 17

1 G. Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation.

4 A. How would I know?  
 5 Q. Were you ever on a plane with  
 6 Mr. Epstein when, to your knowledge,  
 7 Mr. Epstein had sex with anyone?

8 A. Can you repeat the question?

9 Q. Were you ever on a plane with  
 10 Mr. Epstein when, to your knowledge,  
 11 Mr. Epstein had sex with anyone?

12 A. Not that I can recall.

13 Q. Were you ever on a plane with  
 14 Mr. Epstein when you saw Mr. Epstein having  
 15 sex with anyone?

16 A. Never.

17 Q. I want to be sure that the question  
 18 and answer is meeting. When you refer to  
 19 having sex with someone, what are you  
 20 referring to?

21 MR. PAGLIUCA: Object to the form  
 22 and foundation.

23 A. Intercourse.

24 Q. And when you refer to intercourse,  
 25 what do you refer to?



Confidential

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Page 20

1 G. Maxwell - Confidential  
 2 A. I think everyone here can  
 3 understand what intercourse is, is when you  
 4 have sex. I don't know how to say  
 5 intercourse any other way, having sex with  
 6 somebody. Perhaps you would like to define  
 7 it for me.

8 Q. I'm trying to get your definition  
 9 right now because you are the witness. When  
 10 you use the term intercourse, what are you  
 11 referring to?

12 A. I'm referring to a penis entering  
 13 someone's vagina.  
 14

[REDACTED]

1 G. Maxwell - Confidential

2 [REDACTED]

11 MR. PAGLIUCA: I'm going to  
 12 instruct you not to answer, unless you  
 13 tie it to a specific individual related  
 14 to this case per the court's order.

15 MR. BOIES: I think the court's  
 16 order specifically permits this question  
 17 with respect to occasions related to  
 18 this case. If you instruct her not to  
 19 answer, all you're going to do is bring  
 20 her back. That's up to you.

21 MR. PAGLIUCA: It's up to you as  
 22 the questioner, Mr. Boies.

[REDACTED]

Page 19

Page 21

1 G. Maxwell - Confidential

2 [REDACTED]

1 G. Maxwell - Confidential

2 [REDACTED]

6 You haven't tied your question to  
 7 time or individual or specific location.  
 8 And so unless you do that, we have an  
 9 open-ended question that would span from  
 10 the early '90s to 2000 or so, which  
 11 would not be tied to the key events,  
 12 individuals or locations of this case.

13 BY MR. BOIES:

14 Q. Let me ask you a couple more  
 15 questions. Then I think we probably ought to  
 16 call the court and get some guidance on this.

17 [REDACTED]

24 Q. Were you ever on Mr. Epstein's  
 25 plane when, to your knowledge, Mr. Epstein

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1 G. Maxwell - Confidential  
2 had oral sex with anyone [REDACTED]

3 A. No.  
4 [REDACTED]

1 G. Maxwell - Confidential  
2 court case on this list, one other person.

3 Q. Which one is that?  
4 A. Haley Robson, because she has been  
5 on the court papers.

6 Q. Haley who?  
7 A. Robson.  
8 The only two I know is [REDACTED] and  
9 Virginia, and one other name I recognize.

10 Q. So just to be clear, the only two  
11 people listed on Maxwell Deposition Exhibit  
12 26 that you know are [REDACTED]

13 A. And Virginia Roberts, yes.  
14 Q. And the only other person on --  
15 A. I don't know her, I recognize her  
16 name.

17 Q. -- whose name you recognize is  
18 Haley Robson, but you don't know her, never  
19 met her?

20 A. I don't recall ever meeting her.

21 Q. Other than what you know from her  
22 participation in this case, you don't know  
23 anything about her, is that your testimony?

24 A. I don't even know -- I don't even  
25 recognize what her participation is in this

1 G. Maxwell - Confidential  
2 [REDACTED]

4 MR. BOIES: I will show you a  
5 document we have marked for  
6 identification as Maxwell Deposition  
7 Exhibit 26.

8 (Maxwell Exhibit 26, List of names,  
9 marked for identification, as of this  
10 date.)

11 Q. I would like you to go down this  
12 list and tell me which names, if any, you  
13 recognize on this list.

14 A. Just in the way the list runs in  
15 order, I recognize the names -- by recognize,  
16 only stating that I know the name, I'm not  
17 making any representations about these  
18 people.

19 Q. I understand that, and I will come  
20 back and ask you, but if you don't recognize  
21 the name...

22 A. [REDACTED]. Virginia Roberts.  
23 And that's it on this list. Let me just  
24 double-check. I recognize the name, not  
25 because I know her, but just because of the

1 G. Maxwell - Confidential  
2 case. I just know I recognize her name, and  
3 I can't recall right now what her involvement  
4 is, but I recognize the name.

5 Q. Other than whatever her involvement  
6 in this case may be or may not be?

7 A. Correct.

8 Q. Is it fair to say it is your  
9 testimony that except for that, you have no  
10 knowledge about her at all?

11 A. Correct.

12 Q. And other than [REDACTED],  
13 Virginia Roberts and Haley Robson, you don't  
14 know anything at all about any of the other  
15 people listed here, is that your testimony?

16 A. I don't even know who they are.  
17 You could put any names in front of me, I  
18 wouldn't recognize them, I don't know them, I  
19 don't even recognize the names.

20 Q. I think this is clear from your  
21 last answer, but I want to be sure. It is  
22 your testimony that other than [REDACTED]  
23 and Virginia Roberts, you never met any of  
24 these people at any homes of Mr. Epstein, is  
25 that your testimony?

Confidential

1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation.  
 4 A. I don't even know who they are, so  
 5 I wouldn't -- I have no clue who they are, I  
 6 don't know where they are, I don't know where  
 7 they come from, I don't recognize -- I only  
 8 pointed out Haley Robson because I recognize  
 9 the name from various documents I read. I  
 10 don't have any knowledge of any other person  
 11 on this list. I don't believe I've ever even  
 12 seen these names. I don't know who they are  
 13 at all.  
 14 I would not be able to identify a  
 15 single name on this list other than those  
 16 three that I have indicated to you.

17 [REDACTED]

1 G. Maxwell - Confidential  
 2 a massage at his home in New York, regardless  
 3 of where in the home it was?  
 4 A. No.  
 5 Q. Have you ever seen anyone give  
 6 Mr. Epstein a massage at his home in Palm  
 7 Beach?  
 8 A. I have.  
 9 Q. Have you ever seen anyone give  
 10 Mr. Epstein a massage in New Mexico?  
 11 A. No, I can't recall.  
 12 Q. Have you ever seen anyone give  
 13 Mr. Epstein a massage in the Virgin Islands?  
 14 A. I have.  
 15 Q. Have you ever seen anyone give  
 16 Mr. Epstein a massage in Paris?  
 17 A. No, I don't recall seeing that.  
 18 Q. Have you ever seen anyone give  
 19 Mr. Epstein a massage on an airplane?  
 20 A. No.  
 21 Q. Have you ever seen anyone give  
 22 Mr. Epstein a massage anywhere other than his  
 23 home in Palm Beach or in the Virgin Islands?  
 24 A. I'm sorry, can you just repeat the  
 25 question?

1 G. Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 Q. Did you provide massages to  
 6 Mr. Epstein?  
 7 A. No.  
 8 Q. What?  
 9 A. No.  
 10 Q. Were you ever present when anyone  
 11 provided a massage to Mr. Epstein?  
 12 MR. PAGLIUCA: Object to the form  
 13 and foundation.  
 14 A. I have seen people give Mr. Epstein  
 15 massages. I have seen him on a massage  
 16 table. I have seen that.  
 17 Q. Have you seen someone other than  
 18 yourself give Mr. Epstein a massage at his  
 19 home in New York?  
 20 A. I can't recall seeing him in the  
 21 massage room in New York, no.  
 22 Q. I'm not asking whether you recall  
 23 seeing him in the massage room in New York.  
 24 I'm asking you whether you have ever seen  
 25 someone other than yourself give Mr. Epstein

1 G. Maxwell - Confidential  
 2 Q. Have you ever seen anyone give  
 3 Mr. Epstein a massage anywhere other than in  
 4 his home in Palm Beach or in the Virgin  
 5 Islands?  
 6 A. No, I can't think of anyplace.  
 7 Q. Have you ever seen anyone give  
 8 Mr. Epstein a massage when Mr. Epstein was  
 9 not clothed?  
 10 A. Sorry, can you repeat the question?  
 11 Q. Have you ever seen anyone give  
 12 Mr. Epstein a massage when Mr. Epstein was  
 13 not clothed?  
 14 A. I think when Mr. Epstein received  
 15 massages, he never had clothes on.  
 16 Q. Who did you see give Mr. Epstein a  
 17 massage?  
 18 A. I can't recall the "whos" because I  
 19 don't really remember, but I have seen him  
 20 receive massages from professional adult  
 21 masseuses that I have seen him receive  
 22 massages.  
 23 Q. When you say professional adult  
 24 masseuses, what are you referring to?  
 25 A. I just want to be sure that we

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1 G. Maxwell - Confidential  
2 understand that the times I have seen him  
3 receive a massage it's been by somebody who  
4 is an adult, clearly an older person. I  
5 don't know if they're professional, but an  
6 older person appearing to be a professional  
7 masseuse.

8 Q. What led you to believe that the  
9 person giving the massage was a professional  
10 masseuse?

11 A. Because the massages that I  
12 witnessed looked professional. I don't know  
13 how to -- I'm defining it as opposed to the  
14 ones from where people ask me inappropriate  
15 questions, I couldn't answer, but these are  
16 people who would be clothed giving a  
17 professional massage, it appeared to be a  
18 professional massage, as opposed to any other  
19 type of massage.

20 Q. Have you ever had what you refer to  
21 as a professional massage?

22 A. I have.

23 Q. Have you ever had what you refer to  
24 as a professional massage in any of Mr.  
25 Epstein's homes?

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1 G. Maxwell - Confidential

2 A. I have.

3 Q. Did you ever have what you refer to  
4 as a professional massage in Mr. Epstein's  
5 home in New York?

6 A. I don't recall, but I think I have,  
7 but I don't recall. I must have, but I don't  
8 recall.

9 Q. Did you ever have what you refer to  
10 as a professional massage in Mr. Epstein's  
11 home in Palm Beach?

12 A. I did.

13 Q. Did you ever have what you refer to  
14 as a professional massage in Mr. Epstein's  
15 home in New Mexico?

16 A. I did.

17 Q. Did you ever have what you refer to  
18 as a professional massage in Mr. Epstein's  
19 home in Paris?

20 A. I did.

21 Q. Did you ever have what you refer to  
22 as a professional massage in the Virgin  
23 Islands?

24 A. I did.

25 Q. When you had what you referred to

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1 G. Maxwell - Confidential  
2 as professional massages, you were clothed or  
3 unclothed?

4 A. Unclothed.

5 Q. Completely unclothed?

6 A. Typically when you receive a  
7 massage you are not clothed, so I was  
8 unclothed, as is the norm in a massage  
9 situation.

10 Q. That is, you didn't have any  
11 clothes on, is that the case?

12 A. Generally, what happens is you are  
13 not wearing any clothes and you have a towel  
14 or sheet that covers you while you are  
15 receiving the massage, so I would be covered  
16 always, but underneath the sheet or towel, I  
17 would not be wearing any clothing.

18 Q. Are you saying that the massage was  
19 through the sheet?

20 A. Well, in some instances, yes.

21 Q. It is your testimony that when you  
22 received what you referred to as professional  
23 massages, the masseuse didn't touch your  
24 skin, only touched the sheet?

25 MR. PAGLIUCA: Object to the form

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1 G. Maxwell - Confidential  
2 and foundation.

3 A. I didn't say that. I said in some  
4 instances, some massages are where you don't  
5 touch the skin, so I have received massages  
6 where I don't get touched, especially if it's  
7 just pressure, so it's through a sheet, but I  
8 have also received massages where you are  
9 touched and the sheet is just there for  
10 modesty.

11 Q. Have you ever received what you  
12 referred to as a professional massage when  
13 anyone else was in the room other than the  
14 person that you are referring to as a  
15 professional masseuse?

16 MR. PAGLIUCA: Object to the form  
17 and foundation.

18 A. Can you repeat the question,  
19 please?

20 Q. Have you ever received a massage  
21 when anyone was in the room other than the  
22 person that you refer to as a professional  
23 masseuse?

24 MR. PAGLIUCA: Same objection.

25 A. I am entirely possible that in the

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1 G. Maxwell - Confidential  
2 course of receiving a massage someone would  
3 come in and sit and chat to me while I was  
4 getting a massage, a friend would come in.  
5 That has happened.

6 Q. Do you recall that happening?

7 A. Not with specificity, I can't think  
8 of it actually, but I know that I've had  
9 friends come in and we've talked and as I got  
10 a massage, that has happened.

11 Q. Have you ever received a massage  
12 when Mr. Epstein was present?

13 A. He has entered the room and gave me  
14 a message or asked me a question, that has  
15 happened.

16 Q. Have you ever received a massage  
17 when Mr. Epstein was in the room other than  
18 just to come in to give you a message or ask  
19 you a question?

20 MR. PAGLIUCA: Object to the form  
21 and foundation.

22 A. Not that I recall.

23 Q. Did you ever participate in  
24 arranging for anyone to give Mr. Epstein a  
25 massage?

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1 G. Maxwell - Confidential

2 A. Part of my duties and my job -- can  
3 you repeat the question so I understand, and  
4 I give you the right answer exactly.

5 Q. Did you ever participate in  
6 arranging for anyone to give Mr. Epstein a  
7 massage?

8 A. Part of my professional  
9 responsibilities, I did, and I've testified  
10 previously, go to spas and other professional  
11 areas and received massages from people in  
12 these places, and if I felt that person was  
13 good or I had had a good massage, I had asked  
14 if they do home visits.

15 In that capacity, I had, people did  
16 come to the house in that capacity, that I  
17 thought were good.

18 Q. Did you ever arrange for anyone to  
19 give Mr. Epstein a massage or to come to his  
20 home to give him a massage, other than  
21 someone who had previously given you a  
22 massage?

23 A. Sorry, can you repeat the question?

24 Q. Did you ever arrange for anyone to  
25 give Mr. Epstein a massage or to come to his

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1 G. Maxwell - Confidential  
2 home to give him a massage, other than  
3 someone who had previously given you a  
4 massage?

5 A. No, I don't think so. No, I don't  
6 think so.

7 Q. Is it your testimony that everyone  
8 that you arranged to come to Mr. Epstein's  
9 home to give Mr. Epstein a massage was  
10 somebody you had already had a massage from?

11 A. No, that is not my testimony. I  
12 don't recall -- there were definitely  
13 instances where I had a massage and -- so  
14 what you are asking me was if anyone came to  
15 the house to give him a massage that I had  
16 not had a massage from myself?

17 Q. It's a little different than that.

18 A. Okay.

19 Q. You've testified that you arranged  
20 for some people to come to Mr. Epstein's home  
21 to give him a massage, correct?

22 A. Yes.

23 Q. And at one point, I thought you had  
24 testified that before you arranged to have  
25 people come to give Mr. Epstein a massage,

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1 G. Maxwell - Confidential

2 you had -- you didn't use the word tested  
3 them out, but that you had previously gotten  
4 them to give you a massage so that you could  
5 see how good they were, is that fair to say?

6 A. If I thought they were -- if I  
7 thought it was a good massage, yes, that is  
8 my testimony.

9 Q. What I had thought, and what I'm  
10 now asking you is that everyone who you  
11 arranged to come to Mr. Epstein's home to  
12 give him a massage was somebody who you had  
13 already had a massage from, is that fair?

14 A. Typically, yes, but that wasn't  
15 exclusively. So I know that friends of mine,  
16 for instance, would have a masseuse or  
17 masseur that they thought was very good, and  
18 they said this is a very good person.

19 So it is possible, and I'm pretty  
20 sure sometimes on recommendations of other  
21 people, that without me having a massage from  
22 them, that they may have come to the house.  
23 So I could not testify that every single  
24 person that came to the house I received a  
25 massage from, because that would not be true.

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1 G. Maxwell - Confidential  
 2 Q. Was every person who you arranged  
 3 to come to Mr. Epstein's house to give a  
 4 massage someone who either you had already  
 5 had a massage from or you had a friend who  
 6 recommended them as a good professional  
 7 masseuse?

8 MR. PAGLIUCA: Object to the form  
 9 and foundation.

10 A. Typically, that is how that would  
 11 work.

12 Q. Was there ever anyone who you  
 13 arranged to come to Mr. Epstein's house to  
 14 give him a massage, someone who you had not  
 15 previously gotten a massage from yourself or  
 16 received a recommendation from one of your  
 17 friends that it was a good professional  
 18 masseuse?

19 MR. PAGLIUCA: Object to the form  
 20 and foundation.

21 A. I cannot think of anyone that would  
 22 fit that category.

23 Q. You made a point in a previous  
 24 answer of referring to people as adult  
 25 masseuses. Do you recall that?

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1 G. Maxwell - Confidential

2 A. I do.

3 Q. When you refer to someone as an  
 4 adult masseuse, what are you referring to?

5 A. I think everybody in this room is  
 6 an adult.

7 Q. I don't necessarily disagree with  
 8 that, but what I'm asking you, since I can't  
 9 carry all these people with me every time  
 10 somebody reads this transcript, is what do  
 11 you mean by an adult?

12 A. Well, I think an adult is somebody  
 13 who looks older and professional and is  
 14 someone who has lived some life and looks  
 15 like any one of us in this room do, some a  
 16 little older and some a little younger.

17 Q. You are aware that there are  
 18 assertions that Mr. Epstein had massages from  
 19 females under the age of 21?

20 A. I am aware of that.

21 Q. Insofar as you are aware, did  
 22 Mr. Epstein ever have a massage from anyone  
 23 under the age of 21?

24 MR. PAGLIUCA: Object to the form  
 25 and foundation.

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1 G. Maxwell - Confidential

2 A. I know what the allegations are,  
 3 and I am aware of those, but as to my actual  
 4 knowledge of somebody under the age of 21, I  
 5 can't say that I know, I can't think of  
 6 anybody. I know Virginia has obviously made  
 7 those claims and she was 17 when he met her,  
 8 but other than her, I cannot think of  
 9 anybody.

10 Q. Insofar as you are aware, did  
 11 Virginia ever give Mr. Epstein a massage?

12 A. I know she said she did and I  
 13 believe she may have, but I don't ever see  
 14 her giving him a massage, so I can't say.

15 Q. Leaving aside any information that  
 16 you have that has come from Virginia in the  
 17 last decade?

18 A. Right.

19 Q. Going back to the time when  
 20 Virginia was less than 21, at that period of  
 21 time, did you believe that Virginia was  
 22 giving Mr. Epstein massages?

23 A. I do think she was giving him  
 24 massages.

25 Q. Is it your testimony that the only

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1 G. Maxwell - Confidential

2 female that you had any reason to believe was  
 3 under 21 who was giving Mr. Epstein massages  
 4 was Virginia?

5 MR. PAGLIUCA: Object to the form  
 6 and foundation.

7 A. First of all, I didn't know how old  
 8 Virginia was, so other than Virginia, so I  
 9 can't say, but other than -- I was not aware  
 10 of anybody else, no.

11 Q. You first met Virginia when?

12 A. I don't know.

13 Q. Approximately?

14 A. I believe it was in 2000, but now  
 15 I'm going off the knowledge that I have, not  
 16 from memory, so I met her the end of 2000  
 17 apparently.

18 Q. And when you met Virginia in 2000,  
 19 how old did you think she was?

20 MR. PAGLIUCA: Object to the form  
 21 and foundation.

22 A. I didn't think about how old she  
 23 was. I don't recall the actual meeting of  
 24 Virginia, so I can't say, but I think she was  
 25 at least, I thought she was a professional

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 2 masseuse as far as I can recall today, so  
 3 that would have made her, I thought that  
 4 would have made her, to work in a spa, I  
 5 didn't think about, and I, I thought she  
 6 appeared to be a professional masseuse.  
 7 Q. Remember questions a while ago  
 8 where you made a big point about people being  
 9 adult masseuses?  
 10 A. Right, yeah.  
 11 Q. When you met Virginia for the first  
 12 time --  
 13 A. Right.  
 14 Q. -- did you think she was an adult  
 15 masseuse, as you use that term?  
 16 A. I don't recall actually meeting  
 17 Virginia at the time, and in fact, were it  
 18 not for this case, I'm not sure I would  
 19 recall her at all.  
 20 Q. But you do recall knowing Virginia?  
 21 A. I do, yes.  
 22 Q. You do recall knowing that Virginia  
 23 was giving Mr. Epstein massages, correct?  
 24 MR. PAGLIUCA: Object to the form  
 25 and foundation.

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1 G. Maxwell - Confidential  
 2 A. I believe she was, but I can't say  
 3 for sure.  
 4 Q. Why do you believe Virginia was  
 5 giving Mr. Epstein massages?  
 6 A. Today, because -- but back then.  
 7 Q. Back then?  
 8 A. Because at some point she would  
 9 have been going to the massage room to give  
 10 massages.  
 11 Q. Back then, in the period around  
 12 2000?  
 13 A. Right.  
 14 Q. You believed that Virginia was  
 15 giving Mr. Epstein massages, correct?  
 16 A. I believe I did, yes.  
 17 Q. At the time back in the period  
 18 around 2000 that you believe that Virginia  
 19 was giving Mr. Epstein massages, how old did  
 20 you think Virginia was at the time?  
 21 MR. PAGLIUCA: Object to the form  
 22 and foundation.  
 23 A. I don't believe that I -- I don't  
 24 know what I thought at the time. It's a long  
 25 time ago and I just have no idea what I

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1 G. Maxwell - Confidential  
 2 thought. I really don't recall her, so it's  
 3 hard for me to testify what I thought about  
 4 her age at the time.  
 5 Q. Was Virginia, in the period of  
 6 around 2000, the youngest person that, as you  
 7 understood it, was giving Mr. Epstein  
 8 massages?  
 9 MR. PAGLIUCA: Object to the form  
 10 and foundation.  
 11 A. Again, I can't testify to her age,  
 12 but everybody else that I can recall seemed  
 13 to be again, like I would say, adults.  
 14 Q. You didn't think Virginia was an  
 15 adult, did you?  
 16 MR. PAGLIUCA: Object to the form  
 17 and foundation.  
 18 A. Like I said, I don't recall her. I  
 19 don't recall thinking about -- my memory is  
 20 of adults giving Jeffrey massages, and as I  
 21 don't really remember Virginia around that  
 22 time, I don't know what I think.  
 23 Q. You do remember Virginia, about  
 24 that time back in the 2000s, giving  
 25 Mr. Epstein massages?

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1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation.  
 4 A. I barely remember her at all.  
 5 Q. Whether you barely remember her or  
 6 not, you do remember that back in the period  
 7 around 2000, Virginia was giving Mr. Epstein  
 8 massages, right?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. Only in the most general terms. It  
 12 would be somebody who would give him a  
 13 massage, and that's it.  
 14 Q. During the period of time back in  
 15 the period around 2000, when you knew that  
 16 Virginia was somebody who would give  
 17 Mr. Epstein a massage, was she somebody who  
 18 you considered an adult?  
 19 MR. PAGLIUCA: Objection to form  
 20 and foundation.  
 21 A. I didn't consider her at all  
 22 because she is not somebody that I really  
 23 interacted with.  
 24 Q. It is your testimony that Virginia  
 25 was not somebody that you interacted with, is

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<p>1 G. Maxwell - Confidential</p> <p>2 that what you're saying?</p> <p>3 A. I said I didn't really interact --</p> <p>4 it's not that I didn't interact with her at</p> <p>5 all, but not enough for her to make a very</p> <p>6 strong and lasting impression.</p> <p>7 Q. Is it your testimony that you</p> <p>8 interacted with Virginia, but you didn't</p> <p>9 really interact with Virginia?</p> <p>10 MR. PAGLIUCA: Objection to form</p> <p>11 and foundation.</p> <p>12 A. I don't understand what that</p> <p>13 actually even means.</p> <p>14 Q. You said that you interacted with</p> <p>15 Virginia. Do you recall that?</p> <p>16 A. In the most general terms, I do</p> <p>17 recall her.</p> <p>18 Q. And then you testified that you</p> <p>19 didn't really interact with Virginia. Do you</p> <p>20 recall saying that?</p> <p>21 A. I consider this a real interaction.</p> <p>22 I will not be forgetting this any time soon.</p> <p>23 But the most casual of relationships, where</p> <p>24 you say hello or to be nice or polite, or</p> <p>25 offer someone a glass of water or something</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: We've been going for</p> <p>3 about an hour this morning. I think</p> <p>4 you're probably aware that Ms. Maxwell</p> <p>5 was deposed for a full seven hours on a</p> <p>6 prior occasion. In my view, the court's</p> <p>7 order is limited and we shouldn't be</p> <p>8 covering ground that we covered in the</p> <p>9 prior deposition.</p> <p>10 At some point, we are going to need</p> <p>11 to call the court, if we go at this</p> <p>12 pace, for instruction about length of</p> <p>13 time here, because my view is that this</p> <p>14 is not supposed to be a seven-hour</p> <p>15 deposition, you are not supposed to be</p> <p>16 covering old ground, and you should be</p> <p>17 asking questions related to the, what I</p> <p>18 characterize as the eight discreet areas</p> <p>19 related to a, quote, sexual activity</p> <p>20 which precedes all of the eight items in</p> <p>21 the court's order of July 10th.</p> <p>22 We spent a lot of time not talking</p> <p>23 about those issues, and I suggest we get</p> <p>24 to it or we get the court on the phone</p> <p>25 for some guidance about timing here.</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 is what I would term a casual interaction.</p> <p>3 It is not something that, from what are we</p> <p>4 talking, 17, 18 years ago, something that</p> <p>5 really sticks out in my mind.</p> <p>6 Q. Is it your testimony that your only</p> <p>7 relationship with Virginia was what you</p> <p>8 referred to as a casual relationship where</p> <p>9 you might say hello or offer a glass of water</p> <p>10 to be polite?</p> <p>11 MR. PAGLIUCA: Objection to form</p> <p>12 and foundation.</p> <p>13 A. Generally, yes, that's how I would</p> <p>14 characterize.</p> <p>15 MR. PAGLIUCA: We've been going for</p> <p>16 about an hour. I would like to take a</p> <p>17 break.</p> <p>18 MR. BOIES: Certainly.</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 10:01 a.m., and we are going off the</p> <p>21 record.</p> <p>22 (Recess.)</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 10:10 a.m., and we are back on the</p> <p>25 record. This also begins DVD No. 2.</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. BOIES: I'm happy to get the</p> <p>3 court on the phone any time you like. I</p> <p>4 think the questions clearly relate to</p> <p>5 sexual activity.</p> <p>6 MR. PAGLIUCA: How old Virginia</p> <p>7 Roberts was or not does not relate to</p> <p>8 sexual activity. Her memory of how old</p> <p>9 Virginia Roberts may or may not have</p> <p>10 been does not relate to sexual activity,</p> <p>11 and it was all asked and answered in the</p> <p>12 prior deposition.</p> <p>13 MR. BOIES: Your witness introduced</p> <p>14 the subject, asserting that all of these</p> <p>15 people were adults. I didn't ask</p> <p>16 whether they were adults at that time.</p> <p>17 I simply asked a general question that</p> <p>18 was expressly covered by the judge's</p> <p>19 order. Your client opened the door,</p> <p>20 volunteered this and made it necessary</p> <p>21 to do this.</p> <p>22 I am happy to go to the court any</p> <p>23 time you want, and I'm happy to go over</p> <p>24 with the court some of these questions</p> <p>25 and put it in context for the court with</p>



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 2 respect to what the documentary evidence  
 3 is. I'm happy to do that any time you  
 4 want.  
 5 MR. PAGLIUCA: Let's get on with it  
 6 and ask some questions that are relevant  
 7 to what the court ordered here.  
 8 MR. BOIES: I am asking questions  
 9 that I think are clearly relevant. If  
 10 you don't think so, I invite you to take  
 11 it to the court. If not, then let me  
 12 get on with my questions. Any time that  
 13 I get to a point where you think you  
 14 want to stop the deposition and go to  
 15 the court, I am more than prepared to do  
 16 that.  
 17 BY MR. BOIES:  
 18 Q. Ms. Maxwell, during the break, did  
 19 you have conversations with anyone?  
 20 A. My lawyers.  
 21 Q. What did your lawyers say to you?  
 22 MR. PAGLIUCA: Don't answer that  
 23 question.  
 24 Q. What did you say to your lawyer?  
 25 MR. PAGLIUCA: Don't answer that

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1 G. Maxwell - Confidential  
 2 question.  
 3 Q. Did you ask your lawyer for any  
 4 legal advice?  
 5 MR. PAGLIUCA: Don't answer that  
 6 question.  
 7 Q. Did your lawyer give you any legal  
 8 advice?  
 9 MR. PAGLIUCA: Don't answer that  
 10 question.  
 11 MR. BOIES: These are all yes or no  
 12 questions.  
 13 MR. PAGLIUCA: She is not answering  
 14 any of those questions, Mr. Boies.  
 15 Q. Did your lawyer give you advice as  
 16 to how to answer the questions I was asking?  
 17 MR. PAGLIUCA: Don't answer that  
 18 question.  
 19 Q. Did your lawyer tell you that you  
 20 were creating problems for yourself with some  
 21 of your answers?  
 22 MR. PAGLIUCA: Don't answer that  
 23 question.  
 24 Q. Did your lawyer suggest how you  
 25 might answer some of my questions?

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1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Don't answer that  
 3 question.  
 4 Q. Did you have conversations with  
 5 anyone other than your lawyer during the  
 6 break?  
 7 A. No.  
 8 Q. Did your lawyer tell you why he had  
 9 taken a break?  
 10 MR. PAGLIUCA: Don't answer that  
 11 question.  
 12 I don't think I did, by the way.  
 13 MR. BOIES: I'm happy to depose you  
 14 about it, if you want.  
 15 MR. PAGLIUCA: Sure.  
 16 MR. BOIES: I'm serious about that.  
 17 I'm happy to put you under oath right  
 18 now, and if you want to start talking  
 19 about what you did or did not do, I'm  
 20 happy to interrupt this deposition, put  
 21 you under oath and let you testify.  
 22 MR. PAGLIUCA: Ask a question.  
 23 MR. BOIES: I'm telling you.  
 24 Otherwise, I suggest you stop making  
 25 speeches.

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1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Why don't we both  
 3 stop making speeches.  
 4 BY MR. BOIES:  
 5 [REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]

[REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]

[REDACTED]

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1 G. Maxwell - Confidential  
2 Epstein's home in Palm Beach?  
3 MR. PAGLIUCA: Objection to form  
4 and foundation.  
5 [REDACTED]

[REDACTED]

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1 G. Maxwell - Confidential  
2 MR. PAGLIUCA: Objection to form  
3 and foundation.  
4 A. [REDACTED]

[REDACTED]

8 MR. PAGLIUCA: Objection to form  
9 and foundation.  
10 A. [REDACTED]

[REDACTED]

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1  
2

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[REDACTED]

21  
22  
23

MR. PAGLIUCA: Objection to form and foundation.

[REDACTED]

1  
2

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[REDACTED]

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[REDACTED]

1  
2

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[REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]

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1 G. Maxwell - Confidential  
2 Q. You were aware of how many people  
3 gave Mr. Epstein massages?  
4 MR. PAGLIUCA: Objection to form  
5 and foundation.  
6 A. I was not with him actually very  
7 often. I was frequently -- we were  
8 frequently not together, so I couldn't know  
9 what he would be doing when I wasn't with  
10 him.  
11 But when we were together, the  
12 behavior as described as alleged did not  
13 happen, so he would have one massage a day,  
14 that would be it.  
15 Q. So insofar as you were aware and  
16 when you were with Mr. Epstein, he only had  
17 one massage a day?  
18 A. Yeah.  
19 Q. Other than Virginia Roberts, as you  
20 understood it at the time, were any of the  
21 people that gave Mr. Epstein massages women  
22 who were under 21?  
23 MR. PAGLIUCA: Objection to form  
24 and foundation.  
25 A. I don't know what the ages were of

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1 G. Maxwell - Confidential  
2 [REDACTED]

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1 G. Maxwell - Confidential  
2 the people who were giving him massages, but  
3 I believe they were professional masseuses.  
4 Q. I think you testified that you  
5 believe that Virginia Roberts was a  
6 professional masseuse, is that correct?  
7 MR. PAGLIUCA: Objection to form  
8 and foundation.  
9 A. Based on how allegedly we met,  
10 which was at a spa, I believe that when you  
11 work at a spa, you are a professional. So  
12 I'm basing my statement based on her working  
13 as a professional massage person, at a  
14 professional spa.  
15 Q. When you met Ms. Roberts at the  
16 spa, what spa was it?  
17 MR. PAGLIUCA: Objection to form  
18 and foundation.  
19 A. I don't recall the actual meeting,  
20 but based on all the evidence and stories, it  
21 was at Mar-a-Lago.  
22 Q. You just testified that you met  
23 Virginia Roberts at a spa. Do you recall  
24 that?  
25 MR. PAGLIUCA: Objection to form

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1 G. Maxwell - Confidential  
 2 and foundation.  
 3 A. I said I don't recall the actual  
 4 meeting, but based on the evidence that we  
 5 have been produced, and I now believe it was  
 6 at Mar-a-Lago that that meeting may have  
 7 taken place.  
 8 Q. When you met Virginia Roberts, did  
 9 you understand that she was at that time a  
 10 professional masseuse?  
 11 MR. PAGLIUCA: Objection to form  
 12 and foundation.  
 13 A. I don't recall the actual first  
 14 meeting, I don't know.  
 15 Q. Whether or not you recall the  
 16 actual first meeting, was it your  
 17 understanding that Virginia Roberts was a  
 18 professional masseuse?  
 19 MR. PAGLIUCA: Objection to form  
 20 and foundation.  
 21 A. I had no idea at the time, but I  
 22 believe she was working at a spa, and based  
 23 on what I believe today, she was a masseuse  
 24 at Mar-a-Lago.  
 25 Q. When you say based on what you

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1 G. Maxwell - Confidential  
 2 believe today, you believe she was a masseuse  
 3 at Mar-a-Lago, what is it that you've learned  
 4 that leads you to believe she was a masseuse  
 5 at Mar-a-Lago?  
 6 A. She worked at the spa, and that's  
 7 all I know, that she was 17 and that she held  
 8 herself out to be a masseuse.  
 9 Q. She told you she was a masseuse?  
 10 A. I don't know if she told me at the  
 11 time she was a masseuse. I believe today she  
 12 was a masseuse working at Mar-a-Lago and she  
 13 was 17 years old.  
 14 Q. You said she held herself out as a  
 15 masseuse. Do you recall that?  
 16 A. I just said it. The problem is I  
 17 don't recall with specificity. I don't  
 18 recall the actual meeting, so events in my  
 19 mind are conflated with all of her stories,  
 20 all of the lies that have been told.  
 21 So, today, I believe that she was a  
 22 17-year-old masseuse at Mar-a-Lago.  
 23 Q. Did she ever tell you that she was  
 24 a masseuse at Mar-a-Lago?  
 25 A. I don't recall specific

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1 G. Maxwell - Confidential  
 2 conversations with Virginia. Like I said, I  
 3 would actually barely remember her at all  
 4 were it not for this case.  
 5 Q. Why, then, do you believe she was a  
 6 masseuse at Mar-a-Lago?  
 7 A. Based on having met her at  
 8 Mar-a-Lago. I don't know why else she would  
 9 be at the house.  
 10 Q. At what house?  
 11 A. Why would she come to Jeffrey's  
 12 house if she was not a masseuse at  
 13 Mar-a-Lago, why else would she come.  
 14 Q. Did you ask her to come to  
 15 Jeffrey's house?  
 16 A. I don't recall the first meeting or  
 17 how it went down that she came to give  
 18 Jeffrey a massage or whatever she came to do.  
 19 All I remember as I testified in my first  
 20 deposition is that her mother came and that  
 21 we sat outside and I talked to her mother,  
 22 and that she went in and met Jeffrey and then  
 23 she left. And then subsequent to that, I  
 24 understand she gave him massages.  
 25 Q. My question was a simple yes or no

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1 G. Maxwell - Confidential  
 2 question. Did you ask her to come to  
 3 Jeffrey's house?  
 4 A. I can't recall exactly the meeting.  
 5 Q. In response, I got a paragraph that  
 6 makes a number of assertions that I'm now  
 7 going to have to follow-up. I'm prepared to  
 8 do that, but in light of your counsel's  
 9 desire to move the deposition along, I won't  
 10 have to follow-up things that you volunteer  
 11 if you don't volunteer them.  
 12 So if you will focus on my  
 13 question, and if it is simply a yes or no  
 14 answer and you give a yes or no answer, that  
 15 will shorten the deposition. If you want to  
 16 say other things, I'm not going to try to  
 17 stop you, but I am going to follow-up on what  
 18 you say.  
 19 My question now is simply, do you  
 20 recall, one way or the other, as you sit here  
 21 now, whether you asked Virginia Roberts to  
 22 come to Mr. Epstein's house?  
 23 A. I do not.  
 24 Q. Do you recall, as you sit here now,  
 25 one way or another, whether Virginia Roberts

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<p>1 G. Maxwell - Confidential  2 was a masseuse, a towel girl, a maintenance  3 person or any other type employee at  4 Mar-a-Lago?  5 A. I do not.  6 Q. Did Mr. Epstein ever ask you to  7 attempt to obtain or secure people to give  8 him massages that were not professional  9 masseuses?  10 A. No.  11 Q. Do you remember somebody by the  12 name of Tony Figueroa?  13 A. I don't believe I ever met him.  14 Q. You don't believe you ever met him?  15 A. No.  16 Q. Do you remember anyone other than  17 yourself who secured or obtained people to  18 give Mr. Epstein massages?  19 MR. PAGLIUCA: Objection to form  20 and foundation.  21 A. Can you ask the question again,  22 please?  23 Q. Do you remember anyone other than  24 yourself who secured or obtained people to  25 give Mr. Epstein massages?</p>	<p>1 G. Maxwell - Confidential  2 covered extensively.  3 MR. BOIES: I understand what the  4 prior deposition --  5 A. Other than friends of my family and  6 friends of other people's people, and the  7 people that I've identified, I am aware that  8 Jeffrey had friends that came over that  9 brought their kids with them from time to  10 time.  11 Q. These kids that you refer to, they  12 didn't give Mr. Epstein massages, did they?  13 MR. PAGLIUCA: Mr. Boies, this has  14 been asked and answered already.  15 MR. BOIES: I don't think that  16 particular question was asked and  17 answered, but whether it was asked and  18 answered or not, you can instruct not to  19 answer and then we will move on. I  20 think we take much more time with your  21 interjections than we would if you  22 simply let the witness answer the  23 question.  24 MR. PAGLIUCA: Well, we do, but  25 then we go down this road where you keep</p>
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<p>1 G. Maxwell - Confidential  2 MR. PAGLIUCA: Objection to form  3 and foundation.  4 A. I believe Jeffrey did get massages  5 from other people who were recommendations  6 from other people for massages that had  7 nothing to do with me.  8 Q. Do you know who?  9 A. I only know what I read. Virginia  10 gave people.  11 Q. Other than what Virginia had said  12 in the last 10 years, were you aware of  13 anyone who was obtaining people to give  14 Mr. Epstein massages other than yourself?  15 A. I'm not -- I don't know what other  16 people do. I know that other people  17 recommended massages to him, but I can't  18 testify to what other people do for him or  19 did for him.  20 Q. Back in the 1990s and the 2000s,  21 did you see women under the age of 21 at  22 Mr. Epstein's houses?  23 MR. PAGLIUCA: This has been asked  24 and answered in her prior deposition.  25 Do you understand that? It's been</p>	<p>1 G. Maxwell - Confidential  2 asking these questions that have already  3 been asked and answered.  4 So the witness can answer the  5 question, but let's stick to the topic  6 here.  7 MR. BOIES: If you want to instruct  8 her not to answer, instruct her not to  9 answer. You are not going to convince  10 me with speeches.  11 A. What is the question, please?  12 Q. You referred to friends of  13 Mr. Epstein bringing their kids with them  14 when they came over?  15 A. Yes.  16 Q. Those kids, as you described, did  17 not give Mr. Epstein massages, correct?  18 A. I don't believe so.  19 Q. Limiting the people that we're  20 talking about just to people who gave  21 Mr. Epstein massages or who were brought to  22 the home to give Mr. Epstein massages, were  23 there people other than you who were  24 responsible for bringing those people to Mr.  25 Epstein's house?</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. I have no idea.</p> <p>5 Q. Do you know Joanna Sieberg,</p> <p>6 S-I-E-B-E-R-G?</p> <p>7 A. No.</p> <p>8 MR. PAGLIUCA: Showberg (sic)?</p> <p>9 MR. BOIES: Yes.</p> <p>10 MR. PAGLIUCA: You said Sieberg.</p> <p>11 A. I do know Johanna Sieberg.</p> <p>12 Q. Did Joanna ever give Mr. Epstein a</p> <p>13 massage?</p> <p>14 A. I believe she did.</p> <p>15 Q. Did she ever give you a massage?</p> <p>16 A. She did.</p> <p>17 Q. Was she what you referred to as a</p> <p>18 professional masseuse?</p> <p>19 A. I would.</p> <p>20 Q. Had she ever worked in a spa?</p> <p>21 A. I don't know if she worked in a</p> <p>22 spa.</p> <p>23 Q. Had she ever, prior to giving you</p> <p>24 and Mr. Epstein massages, had she ever given</p> <p>25 massages to other people?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. Where did she go to massage school?</p> <p>3 A. I don't know.</p> <p>4 Q. When did she go to massage school?</p> <p>5 A. I don't know.</p> <p>6 Q. Did she tell you she went to</p> <p>7 massage school?</p> <p>8 A. I don't recall.</p> <p>9 Q. Did someone else tell you she went</p> <p>10 to massage school?</p> <p>11 A. I don't recall. It's my belief she</p> <p>12 went to massage school and became a</p> <p>13 professional masseuse at some point.</p> <p>14 Q. What is your belief based on?</p> <p>15 A. I don't know why, it's just</p> <p>16 something, I must have had a conversation</p> <p>17 with her, I think, about it, but I don't</p> <p>18 recall specifically the conversation. Just</p> <p>19 in general terms, that's what I believe.</p> <p>20 Q. Is it your testimony that she told</p> <p>21 you in general terms in a conversation that</p> <p>22 she had gone to massage school?</p> <p>23 A. I don't recall a specific</p> <p>24 conversation, but that is my general</p> <p>25 impression.</p>
<p>Page 75</p> <p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. I have no idea, I don't know.</p> <p>5 Q. Prior to the time that Joanna gave</p> <p>6 you and Mr. Epstein massages, had she been a</p> <p>7 professional masseuse?</p> <p>8 MR. PAGLIUCA: Objection to form</p> <p>9 and foundation.</p> <p>10 A. I believe she went to massage</p> <p>11 school and became a professional masseuse.</p> <p>12 Q. Did she go to massage school before</p> <p>13 or after you met her?</p> <p>14 A. I believe after.</p> <p>15 Q. Who paid for her massage school?</p> <p>16 A. I have no idea.</p> <p>17 Q. Who arranged for her to go to</p> <p>18 massage school?</p> <p>19 A. I have no idea.</p> <p>20 Q. Did she ever give Mr. Epstein a</p> <p>21 massage before she went to massage school?</p> <p>22 A. I have no idea.</p> <p>23 Q. Did she ever give you a massage</p> <p>24 before she went to massage school?</p> <p>25 A. I have no idea.</p>	<p>Page 77</p> <p>1 G. Maxwell - Confidential</p> <p>2 Q. Do you know how long she was in</p> <p>3 massage school?</p> <p>4 A. I don't.</p> <p>5 Q. Did Mr. Epstein ask her to go to</p> <p>6 massage school?</p> <p>7 A. I don't know.</p> <p>8 Q. How old was Johanna when she gave</p> <p>9 you a massage?</p> <p>10 A. Mid 20s, I believe.</p> <p>11 Q. And was the timeframe in which she</p> <p>12 gave Mr. Epstein a massage the same timeframe</p> <p>13 she gave you a massage?</p> <p>14 A. I really don't recall. I can only</p> <p>15 recall her giving me massages. I know she</p> <p>16 gave Mr. Epstein massages, but I don't recall</p> <p>17 them. I know she gave me them, I know she</p> <p>18 gave me massages.</p> <p>19 Q. How old was she when she gave</p> <p>20 Mr. Epstein massages?</p> <p>21 A. I met her, I believe, when she was</p> <p>22 in her mid 20.s, it would have been in her</p> <p>23 mid 20s.</p> <p>24 Q. Did Mr. Epstein, insofar as you</p> <p>25 believe, engage in sexual activities with</p>

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<p>1 G. Maxwell - Confidential 2 Johanna? 3 A. I would not know. I would say no. 4 Q. Did you engage in sexual activities 5 with Johanna? 6 A. No. 7 Q. Do you know how Johanna came to 8 know Mr. Epstein? 9 A. I met her at her university and she 10 came to answer phones. 11 Q. When you say she came to answer 12 phones, where? 13 A. In Palm Beach. 14 Q. At Mr. Epstein's home in Palm 15 Beach? 16 A. Yes. 17 Q. So is it fair to say that Johanna 18 was initially hired to answer telephones, 19 according to your testimony? 20 MR. PAGLIUCA: This has already 21 been testified to Mr. Boies. We are 22 repeating testimony now. 23 MR. BOIES: I think in the context 24 of the witness' answers, these are fair 25 questions.</p>	<p>1 G. Maxwell - Confidential 2 instructed that the right way to do it 3 was to bring any issue to him after the 4 conclusion of the deposition. 5 The question that has been raised 6 is whether we should interrupt the 7 deposition now and seek guidance of the 8 court before continuing the deposition. 9 My view is that the deposition 10 needs to continue, and the counsel for 11 the defendant can instruct not to answer 12 and any questions that are instructed 13 not to answer can be brought to the 14 court, but I would not consent to 15 terminating the deposition at this 16 point. 17 MR. PAGLIUCA: I don't know if it's 18 a matter of consent or not. If I move 19 for a protective order, the deposition 20 is over and we can go litigate it in 21 front of Judge Sweet. We are here and 22 I'd like to complete this deposition 23 because this case needs to move along, 24 and quite frankly, I don't want to spend 25 money coming back here to do this again</p>
<p>Page 79</p> <p>1 G. Maxwell - Confidential 2 Now, I've asked you before, if you 3 want to instruct her not to answer, if 4 you want to go to the judge, we are 5 happy to do that, but I would suggest, 6 in the interest of moving it along, that 7 you stop these speeches. 8 MR. PAGLIUCA: You are not moving 9 it along is the problem, so maybe we 10 should call the court and get some 11 direction here, because I am not going 12 to sit here and rehash the testimony we 13 already gave. 14 MR. BOIES: That's fine. 15 THE VIDEOGRAPHER: The time is 16 10:51 a.m. and we are going off the 17 record. 18 (Whereupon, an off-the-record 19 discussion was held.) 20 THE VIDEOGRAPHER: The time is 21 10:56 a.m. and we are going back on the 22 record. This begins DVD No. 3. 23 MR. BOIES: We have just had a call 24 with Judge Sweet's chambers, Judge Sweet 25 is not available and his chambers</p>	<p>Page 81</p> <p>1 G. Maxwell - Confidential 2 or argue this in front of Judge Sweet. 3 But I will simply start referring 4 you back to the transcript and 5 instructing the witness not to answer 6 when I think we are getting into some 7 things that have been asked and answered 8 already. 9 MR. BOIES: Exactly the procedure 10 that I have proposed from the beginning. 11 If you think a question is out of 12 bounds, instruct not to answer and we 13 will then let the judge decide it. 14 BY MR. BOIES: 15 Q. How did it happen, Ms. Maxwell, 16 that Johanna, who had been hired to answer 17 the phones, ended up giving massages to you 18 and Mr. Epstein? 19 MR. PAGLIUCA: I'm going to 20 instruct you not to answer the question. 21 This has been previously, the subject of 22 your former deposition, it doesn't fall 23 into any of the categories ordered by 24 the court, and so you don't need to 25 answer that.</p>



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 2 Q. Was Johanna paid for the massages  
 3 that she gave you?  
 4 A. I didn't pay her, so I believe she  
 5 was paid.  
 6 Q. Who paid her?  
 7 A. I don't know who paid her.  
 8 MR. PAGLIUCA: Again, you've  
 9 already answered that there was no  
 10 sexual activity between yourself and  
 11 Mr. Epstein related to these massages.  
 12 That's record testimony today. That's  
 13 within the scope of the court's order.  
 14 The rest of this is outside the scope of  
 15 the court's order, and I instruct you  
 16 not to answer.  
 17 MR. BOIES: You are taking the  
 18 position that as long as she said says  
 19 that a massage did not involve sexual  
 20 activity, we cannot ask about massages.  
 21 That's your view?  
 22 MR. PAGLIUCA: On this particular  
 23 questioning, yes.  
 24 BY MR. BOIES:  
 25 Q. Did Mr. Epstein pay Johanna for the


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 2 massages that she gave Mr. Epstein?  
 3 MR. PAGLIUCA: You just asked this  
 4 question, and I told her not to answer.  
 5 I will tell her not to answer again for  
 6 the same reasons.  
 7 Q. Do you know how much Mr. Epstein  
 8 paid Johanna to give massages?  
 9 MR. PAGLIUCA: Same instruction to  
 10 the witness. Why do you believe this is  
 11 within the scope of the court's order?  
 12 MR. BOIES: Because of the court's  
 13 reference to massages, and because I  
 14 think how much a girl who was hired to  
 15 answer the phone was paid to give a  
 16 "massage" goes to whether there actually  
 17 was or was not sexual activity involved.  
 18 MR. PAGLIUCA: The witness has  
 19 testified there wasn't.  
 20 MR. BOIES: Perhaps it will  
 21 surprise you, I think it should not,  
 22 that I do not believe in my deposition I  
 23 need to simply accept her  
 24 characterization without  
 25 cross-examination. Now, that's

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 2 something the judge can decide, but a  
 3 question as to how much this young girl  
 4 was being paid for a "massage", I think  
 5 goes directly to the issue of sexual  
 6 activity.  
 7 MR. PAGLIUCA: Here is the problem,  
 8 Mr. Boies, at the first deposition,  
 9 there were very limited instructions not  
 10 to answer and the witness was not told  
 11 not to answer questions about how much  
 12 people were paid or not paid or any of  
 13 those subject matters. The witness was  
 14 only instructed not to answer about  
 15 sexual activity concerning adults in the  
 16 home.  
 17 None of this came up during the  
 18 deposition, and you just don't get a  
 19 chance to redo the deposition because  
 20 you feel like you want to.  
 21 So the judge's order is in the  
 22 context of the instructions to the  
 23 witness not to answer in the first  
 24 deposition, which is simply sexual  
 25 activity involving adults, which was the

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 2 only area that the witness was precluded  
 3 from talking about in the first  
 4 deposition. So that's where we're at.  
 5 MR. BOIES: I think that directly  
 6 misreads the judge's order, including  
 7 where it says: Defendant is ordered to  
 8 answer questions relating to defendant's  
 9 own sexual activity with or involving  
 10 Jeffrey Epstein, with or involving  
 11 plaintiff, with or involving underage  
 12 females, involving or including massage  
 13 with individuals defendant knew to be or  
 14 believed might become known to Epstein.  
 15 MR. PAGLIUCA: All of it is  
 16 preceded by the word sexual activity.  
 17 MR. BOIES: I think your point of  
 18 view is an interesting one, but we will  
 19 see what the judge rules on it.  
 20 BY MR. BOIES:  
 21 

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2 and foundation.  
3 A. [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 MR. PAGLIUCA: Objection to form  
9 and foundation.  
10 A. I don't know.  
11 Q. Did any of them give you massages?  
12 A. No.  
13 Q. [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 MR. PAGLIUCA: Objection to form  
18 and foundation. Asked and answered.  
19 A. No.  
20 Q. Were they ever in the Virgin  
21 Islands?  
22 MR. PAGLIUCA: Objection to form  
23 and foundation.  
24 A. No.  
25 [REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 MR. PAGLIUCA: Objection to form  
25 and foundation.

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1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

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1 G. Maxwell - Confidential  
 2 [REDACTED]

1 G. Maxwell - Confidential  
 2 [REDACTED]

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 2 it to something in the case.  
 3 MR. BOIES: I think it's tied, but  
 4 if you instruct her not to answer, it  
 5 goes into the --  
 6 MR. PAGLIUCA: Meat grinder.  
 7 BY MR. BOIES:  
 8 Q. [REDACTED]  
 14 A. Can you repeat the question?  
 15 Q. [REDACTED]  
 20 MR. PAGLIUCA: Same objection.  
 21 A. No.  
 22 Q. [REDACTED]

1 G. Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 25 Q. Do you know the reporter by the

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1 G. Maxwell - Confidential  
 2 name of Vicky Hart -- Vicky Ward?  
 3 A. I do.  
 4 MR. BOIES: Let me show you a  
 5 document that has been marked for  
 6 identification as Maxwell Deposition  
 7 Exhibit 27.  
 8 (Maxwell Exhibit 27, Article,  
 9 marked for identification, as of this  
 10 date.)  
 11 MR. PAGLIUCA: I'm going to need a  
 12 moment to review this, counsel.  
 13 MR. BOIES: Sure. Let me know when  
 14 you are finished.  
 15 MR. PAGLIUCA: I will.  
 16 Okay.  
 17 BY MR. BOIES:  
 18 Q. Did you see this article prior to  
 19 the time I'm showing it to you?  
 20 A. No.  
 21 Q. This is the first time you have  
 22 seen this article?  
 23 A. Yes.  
 24 Q. When did you first meet Vicky Ward?  
 25 MR. PAGLIUCA: You are not

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1 G. Maxwell - Confidential  
 2 answering those questions. That has  
 3 nothing to do with what we're here for  
 4 today. We will take that up with the  
 5 judge, if we need to.  
 6 Q. Let me direct your attention to a  
 7 portion of this article. Did Vicky Ward ever  
 8 talk to you about women that she believed  
 9 Mr. Epstein had had sex with?  
 10 MR. PAGLIUCA: Don't answer that  
 11 question. We will take that up with the  
 12 judge.  
 13 MR. BOIES: Okay.  
 14 Q. Did Ms. Ward ever mention to you a  
 15 Maria Farmer?  
 16 A. She did.  
 17 Q. Did Ms. Ward ever mention to you an  
 18 Annie Farmer?  
 19 A. She did.  
 20 Q. When did Ms. Ward mention Maria  
 21 Farmer to you?  
 22 A. She called me and asked me, I don't  
 23 know if she mentioned -- I want to take that  
 24 back. I don't know if she mentioned Maria  
 25 Farmer. I think she just mentioned Annie

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1 G. Maxwell - Confidential  
 2 Farmer.  
 3 Q. Who was Annie Farmer?  
 4 A. Annie Farmer was Maria Farmer's  
 5 sister.  
 6 Q. Annie Farmer was Maria Farmer's  
 7 sister?  
 8 A. Uh-huh.  
 9 Q. Who was Maria Farmer?  
 10 A. Maria Farmer was a girl that  
 11 Jeffrey, I believe, helped. She was an  
 12 artist, I believe.  
 13 Q. Did you know Maria Farmer?  
 14 A. I did.  
 15 Q. When did you first meet Maria  
 16 Farmer?  
 17 A. I don't recall.  
 18 Q. Did you see Maria Farmer at  
 19 Mr. Epstein's house in Palm Beach?  
 20 A. No, I don't think so.  
 21 Q. Where did you see Maria Farmer?  
 22 A. I believe I met her in New York at  
 23 some point.  
 24 Q. Did you see Maria Farmer at  
 25 Mr. Epstein's house in New York?

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1 G. Maxwell - Confidential  
 2 A. I don't recall meeting her there,  
 3 but -- I may have, but I don't recall.  
 4 Q. Did you ever meet Annie Farmer?  
 5 A. I did.  
 6 Q. Where did you meet Annie Farmer?  
 7 A. She was in New Mexico.  
 8 Q. At Mr. Epstein's property in New  
 9 Mexico?  
 10 A. Yes.  
 11 Q. And did Mr. Epstein ever have sex  
 12 with Annie Farmer?  
 13 A. I have no idea.  
 14 Q. Did Mr. Epstein ever engage in  
 15 sexual activities with Annie Farmer?  
 16 A. I have no idea.  
 17 Q. Did Mr. Epstein ever engage in  
 18 sexual activities with Maria Farmer?  
 19 A. I don't know, I don't think so.  
 20 Q. Did Maria Farmer ever work for  
 21 Mr. Epstein?  
 22 A. I don't know.  
 23 Q. Did Maria Farmer ever visit you at  
 24 your apartment?  
 25 A. I don't recall her ever coming.

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. Did you ever fly on Mr. Epstein's</p> <p>3 plane with Maria Farmer?</p> <p>4 A. I don't remember.</p> <p>5 Q. Did you ever fly on Mr. Epstein's</p> <p>6 plane with Annie Farmer?</p> <p>7 A. I don't think so.</p> <p>8 Q. Did Maria Farmer ever give</p> <p>9 Mr. Epstein a massage?</p> <p>10 A. I don't -- I have no idea.</p> <p>11 Q. Did Vicky Ward tell you that she</p> <p>12 had interviewed Maria Farmer?</p> <p>13 A. I don't recall.</p> <p>14 Q. What did Vicky Ward tell you about</p> <p>15 Maria Farmer when she talked to you?</p> <p>16 MR. PAGLIUCA: You don't have to</p> <p>17 answer that. That has nothing to do</p> <p>18 with the court's order and why we are</p> <p>19 here.</p> <p>20 Q. Did Vicky Ward tell you she</p> <p>21 interviewed with Maria Farmer, and Maria</p> <p>22 Farmer had said that Mr. Epstein had engaged</p> <p>23 in sexual activities with her?</p> <p>24 A. She never said that.</p> <p>25 Q. Excuse me?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 wrote about them is somebody who talked</p> <p>3 to this witness about it, and I think</p> <p>4 that this is more than easily understood</p> <p>5 cross-examination.</p> <p>6 MR. PAGLIUCA: Your question was,</p> <p>7 do you know whether or not Maria Farmer</p> <p>8 was ever at Mr. Wexner's property in</p> <p>9 Ohio.</p> <p>10 MR. BOIES: Yes. And if you let</p> <p>11 her answer, you will see where it leads.</p> <p>12 If you won't let her answer, the judge</p> <p>13 is going to determine it. And I just</p> <p>14 suggest to you that you stop these</p> <p>15 speeches and stop debating, because you</p> <p>16 are not going to convince me not to</p> <p>17 follow-up on these questions. If you</p> <p>18 can convince the court to truncate the</p> <p>19 deposition, that's your right, but all</p> <p>20 you're doing is dragging this deposition</p> <p>21 out.</p> <p>22 MR. PAGLIUCA: You have the</p> <p>23 opportunity to give me a good faith</p> <p>24 basis why you are asking these</p> <p>25 questions.</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 A. I don't recall ever hearing such a</p> <p>3 thing.</p> <p>4 Q. You know Mr. Les Wexner, correct?</p> <p>5 A. I do.</p> <p>6 Q. Do you know whether or not Maria</p> <p>7 Farmer was ever at Mr. Wexner's property in</p> <p>8 [REDACTED]</p> <p>9 MR. PAGLIUCA: Can you tell me how</p> <p>10 that relates to this order, counselor?</p> <p>11 MR. BOIES: Yes, I think it goes</p> <p>12 directly to the sexual activity related</p> <p>13 to Maria Farmer and what Mr. Epstein was</p> <p>14 doing with Maria Farmer.</p> <p>15 Again, you can instruct not to</p> <p>16 answer.</p> <p>17 MR. PAGLIUCA: I'm trying to</p> <p>18 understand why you are asking these</p> <p>19 questions before I --</p> <p>20 MR. BOIES: I'm asking these</p> <p>21 questions because these are people who</p> <p>22 not only have been publicly written</p> <p>23 about in terms of the sexual activity</p> <p>24 that they were put into in connection</p> <p>25 with Mr. Epstein, but the person who</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. BOIES: I have given you a good</p> <p>3 faith basis.</p> <p>4 MR. PAGLIUCA: You haven't.</p> <p>5 MR. BOIES: Then instruct not to</p> <p>6 answer.</p> <p>7 MR. PAGLIUCA: I am giving you the</p> <p>8 opportunity to say why you are asking</p> <p>9 the question, and why I'm telling her</p> <p>10 not to answer and I am entitled to know</p> <p>11 that.</p> <p>12 MR. BOIES: You are not entitled to</p> <p>13 know why I'm asking the question. You</p> <p>14 are only entitled to know that it</p> <p>15 relates to the subject matter that I am</p> <p>16 entitled to inquire about, and I don't</p> <p>17 think the judge is going to think that,</p> <p>18 you know, where Mr. Epstein shipped</p> <p>19 Maria Farmer off to is outside the scope</p> <p>20 of what I'm entitled to inquire about.</p> <p>21 THE WITNESS: Can we take a break?</p> <p>22 MR. BOIES: Only if you commit not</p> <p>23 to talk to your counsel during the</p> <p>24 break.</p> <p>25 THE WITNESS: That's ludicrous.</p>

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 2 MR. BOIES: You want a break to  
 3 talk to your counsel, right?  
 4 THE WITNESS: I want to use the  
 5 bathroom.  
 6 MR. BOIES: You want to talk to  
 7 your counsel, right?  
 8 THE WITNESS: I talk to my counsel  
 9 all the time.  
 10 MR. BOIES: I don't want you  
 11 talking to your counsel while I'm in the  
 12 middle of this examination.  
 13 MR. PAGLIUCA: I'm going to talk to  
 14 her, so are we going to sit here and go  
 15 for the rest of the day until we're  
 16 done?  
 17 MR. BOIES: No, but I'm going to go  
 18 through the rest of this line of  
 19 questioning, unless you take her and  
 20 walk out and then, I'm going to protest  
 21 that to the judge.  
 22 MR. PAGLIUCA: He is refusing a  
 23 bathroom break to you right now.  
 24 MR. BOIES: No, I'm not. I'm happy  
 25 to have her take a bathroom break as

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1 G. Maxwell - Confidential  
 2 long as she doesn't use it as an excuse  
 3 to get coached by her lawyer.  
 4 THE WITNESS: For the record, I  
 5 want to object strongly to that.  
 6 MR. PAGLIUCA: You don't talk now.  
 7 Do you want to go to the bathroom?  
 8 THE WITNESS: Yes.  
 9 MR. PAGLIUCA: How about if I stay  
 10 here, Mr. Boies, will that work for you?  
 11 MR. BOIES: Absolutely.  
 12 THE VIDEOGRAPHER: The time is  
 13 11:31, and we are going off the record.  
 14 (Recess.)  
 15 THE VIDEOGRAPHER: The time is  
 16 11:34 a.m. and we are back on the  
 17 record. This also begins DVD No. 4.  
 18 BY MR. BOIES:  
 19 Q. Let me approach it this way. If  
 20 you turn to page 5 of 7 of the exhibit that  
 21 is Vicky Ward's Daily Beast article. And if  
 22 you look at the third paragraph where Ms.  
 23 Ward writes: What I had "on the girls" were  
 24 some remarkably brave first-person accounts.  
 25 Three on-the-record stories from the family,

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 2 a mother and her daughters who came from  
 3 Phoenix. The oldest daughter, an artist,  
 4 whose character was vouchsafed to me by  
 5 several sources, including the artist, Eric  
 6 Fischl, had told me weeping as she sat in my  
 7 living room, of how Epstein had attempted to  
 8 seduce both her and separately and her  
 9 younger sister, then only 16."  
 10 Did Ms. Ward tell you that?  
 11 A. No.  
 12 Q. Did Ms. Ward tell you that her  
 13 information was that Mr. Epstein had  
 14 attempted to seduce both Maria and Annie  
 15 Farmer?  
 16 A. No.  
 17 Q. Did you and Mr. Epstein visit Maria  
 18 Farmer in Ohio?  
 19 A. I don't know I would characterize  
 20 the word visit with Mr. Epstein. We went for  
 21 business in Ohio because he worked with  
 22 Mr. Wexner, and I accompanied him on a few  
 23 visits.  
 24 Q. Did you and Mr. Epstein go to Ohio,  
 25 and while you were in Ohio, see Maria Farmer?

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1 G. Maxwell - Confidential  
 2 A. I believe actually that she was --  
 3 stayed at his house there, so I would have  
 4 seen her at the house. I believe I do recall  
 5 seeing her at the house, actually.  
 6 Q. When you say she stayed at the  
 7 house, you are referring to Maria Farmer?  
 8 A. Yeah, I think Maria Farmer was  
 9 painting or something in Ohio, and he let her  
 10 stay at a place that he had.  
 11 Q. When you say "he" let her stay, you  
 12 are talking about Les Wexner?  
 13 A. No, I'm talking about Jeffrey  
 14 Epstein.  
 15 Q. So when you saw Maria Farmer in  
 16 Ohio, it was your understanding that she was  
 17 staying at property that Mr. Epstein had in  
 18 Ohio, is that correct?  
 19 A. I don't know if it was his property  
 20 or he rented it, I don't know what the nature  
 21 was. It was a property that he had that she  
 22 stayed at.  
 23 Q. Maria Farmer was staying in Ohio at  
 24 some property, and you don't know whose  
 25 property it was, is that fair?

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1 G. Maxwell - Confidential  
 2 A. I don't know what -- I don't know  
 3 who owned -- I don't know anything about the  
 4 ownership of the property or how Jeffrey had  
 5 it or why he stayed there, I don't know.  
 6 Q. Was it clear to you that Jeffrey  
 7 had arranged for Maria Farmer to stay at  
 8 wherever she was staying in Ohio?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. I have no idea what the arrangement  
 12 was between Maria Farmer and Jeffrey.  
 13 Q. When you referred to the property  
 14 where Maria Farmer was staying, you said you  
 15 didn't know how Jeffrey had it?  
 16 A. What's your question?  
 17 Q. Was it your understanding that  
 18 Jeffrey did have that property that she was  
 19 staying at in some capacity or another,  
 20 either owning it or leasing it or having been  
 21 given it by a friend?  
 22 MR. PAGLIUCA: Objection to form  
 23 and foundation.  
 24 A. I have no idea.  
 25 Q. Where was this property that you

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1 G. Maxwell - Confidential  
 2 and Mr. Epstein visited Maria Farmer at in  
 3 Ohio?  
 4 MR. PAGLIUCA: Objection to form  
 5 and foundation.  
 6 A. It was in Columbus.  
 7 Q. Was it a house or an apartment?  
 8 A. It was a house.  
 9 Q. When you and Mr. Epstein visited  
 10 Maria Farmer at this house in Columbus, was  
 11 anyone else in the house?  
 12 A. I never visited Maria Farmer at the  
 13 house.  
 14 Q. Did you see Maria Farmer in Ohio?  
 15 A. I recall seeing her, but I didn't  
 16 visit. I didn't go to Ohio to see Maria  
 17 Farmer.  
 18 Q. When you went to Ohio, did you see  
 19 Maria Farmer?  
 20 A. I recall seeing Maria Farmer in  
 21 Ohio.  
 22 Q. Where did you see her?  
 23 A. I recall seeing her at this house  
 24 that Jeffrey stayed at.  
 25 Q. Maria Farmer was staying in the

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1 G. Maxwell - Confidential  
 2 house in Columbus, Ohio, correct?  
 3 A. I don't know the arrangement that  
 4 Maria Farmer had with Jeffrey. I believe she  
 5 was painting there, but I was never aware of  
 6 the arrangement. I know that I saw her in  
 7 Ohio at a house.  
 8 Q. When you were with Maria Farmer at  
 9 this house in Columbus, Ohio, Mr. Epstein was  
 10 with you, correct?  
 11 A. I went to Ohio with him on  
 12 business, and we were at a house that he  
 13 could stay at and I stayed at, and I recall  
 14 Maria Farmer being at this house. That is  
 15 what I recall.  
 16 Q. When you went to Ohio with  
 17 Mr. Epstein, did you see Maria Farmer on more  
 18 than one occasion?  
 19 A. I don't recall.  
 20 Q. You saw Maria Farmer in Ohio with  
 21 Mr. Epstein on at least one occasion,  
 22 correct?  
 23 MR. PAGLIUCA: Objection to form  
 24 and foundation.  
 25 A. I recall seeing her in Ohio, but I

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1 G. Maxwell - Confidential  
 2 couldn't tell you how many times I saw her.  
 3 For sure once, because I have a recollection  
 4 of seeing her once.  
 5 Q. And the house in which you and  
 6 Mr. Epstein and Maria Farmer were in  
 7 Columbus, Ohio, was that a house that you and  
 8 Mr. Epstein were staying in overnight?  
 9 A. I stayed overnight there.  
 10 Q. Was Maria Farmer staying there  
 11 overnight?  
 12 A. I don't recall.  
 13 Q. How many nights did you and  
 14 Mr. Epstein stay in this house in Columbus?  
 15 A. I don't recall.  
 16 Q. Was it more than one?  
 17 A. I don't recall.  
 18 Q. The night or nights that you and  
 19 Mr. Epstein stayed at this house in Columbus,  
 20 was Maria Farmer there?  
 21 A. I don't recall.  
 22 Q. When you saw Maria Farmer in Ohio,  
 23 did you talk to her?  
 24 A. I'm assuming I must have said  
 25 hello, so yes.

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. Other than assuming you may have</p> <p>3 said hello, did you have any conversations</p> <p>4 with her?</p> <p>5 A. Not that I recall.</p> <p>6 Q. Did Maria Farmer complain to you or</p> <p>7 Mr. Epstein about anything?</p> <p>8 MR. PAGLIUCA: Objection to form</p> <p>9 and foundation.</p> <p>10 A. I don't know what she would have</p> <p>11 done if she complained to Jeffrey about</p> <p>12 anything, but she didn't complain to me, as</p> <p>13 far as I recall.</p> <p>14 Q. As far as you know, she didn't</p> <p>15 complain to Mr. Epstein., is that correct?</p> <p>16 A. I have no knowledge of what she did</p> <p>17 or didn't do in that regard.</p> <p>18 Q. Did she call the police or threaten</p> <p>19 to call the police because of anything that</p> <p>20 either you or Mr. Epstein did?</p> <p>21 MR. PAGLIUCA: Objection to form</p> <p>22 and foundation.</p> <p>23 A. I never ever heard that.</p> <p>24 Q. Ms. Ward didn't tell you, is your</p> <p>25 testimony?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 ever see Annie Farmer?</p> <p>3 A. I don't recall ever seeing her.</p> <p>4 Q. Did Annie Farmer ever engage in any</p> <p>5 sexual activity with you?</p> <p>6 A. No.</p> <p>7 Q. Did Annie Farmer ever engage in any</p> <p>8 sexual activity with Mr. Epstein?</p> <p>9 A. I wouldn't know. I would assume</p> <p>10 not, but I don't know.</p> <p>11 Q. Do you have any reason to believe</p> <p>12 that Mr. Epstein engaged in any sexual</p> <p>13 activity with Annie Farmer?</p> <p>14 MR. PAGLIUCA: Objection to form</p> <p>15 and foundation.</p> <p>16 A. I wouldn't know.</p> <p>17 Q. Did you ever give a massage to</p> <p>18 anyone other than Mr. Epstein at any of Mr.</p> <p>19 Epstein's properties?</p> <p>20 A. First of all, I never said I gave</p> <p>21 Mr. Epstein a massage.</p> <p>22 Q. I will ask that question if you</p> <p>23 want, but I was focusing on people other than</p> <p>24 Mr. Epstein right now.</p> <p>25 A. I don't give massages.</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. My testimony is I never heard that,</p> <p>5 period.</p> <p>6 Q. That includes, I assume, that you</p> <p>7 never heard that from Ms. Ward, that's your</p> <p>8 testimony?</p> <p>9 MR. PAGLIUCA: Objection to form</p> <p>10 and foundation.</p> <p>11 A. I think you can safely say if</p> <p>12 you've never heard it at all, it would</p> <p>13 encompass anybody at all. It means you never</p> <p>14 heard it, period.</p> <p>15 Q. Did you ever see Annie Farmer in</p> <p>16 Ohio?</p> <p>17 A. Not that I recall.</p> <p>18 Q. Where did you last see Annie</p> <p>19 Farmer?</p> <p>20 A. I only recall seeing her at the</p> <p>21 ranch.</p> <p>22 Q. In New Mexico?</p> <p>23 A. Yeah.</p> <p>24 Q. Other than seeing Annie Farmer at</p> <p>25 Mr. Epstein's place in New Mexico, did you</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. Let's just tie that down. It is</p> <p>3 your testimony that you've never given</p> <p>4 anybody a massage?</p> <p>5 A. I have not given anyone a massage.</p> <p>6 Q. You never gave Mr. Epstein a</p> <p>7 massage, is that your testimony?</p> <p>8 A. That is my testimony.</p> <p>9 Q. You never gave Annie Farmer a</p> <p>10 massage is your testimony?</p> <p>11 A. I never gave Annie Farmer a</p> <p>12 massage.</p> <p>13 Q. Did you, or to your knowledge,</p> <p>14 Mr. Epstein pay for Annie Farmer to go to</p> <p>15 Thailand?</p> <p>16 MR. PAGLIUCA: Objection to form</p> <p>17 and foundation.</p> <p>18 A. I am not aware.</p> <p>19 Q. Do you know whether Annie Farmer</p> <p>20 went to Thailand?</p> <p>21 A. I have no knowledge of anything</p> <p>22 like that.</p> <p>23 Q. Did you ever give anyone</p> <p>24 instructions as to how to give a massage?</p> <p>25 MR. PAGLIUCA: Objection to form</p>



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1 G. Maxwell - Confidential  
 2 and foundation.  
 3 A. No. With a clarification, I do --  
 4 I have very -- how to massage feet, pressure  
 5 points on a foot and pressure points on a  
 6 hand.  
 7 Q. Is what you're saying is that you  
 8 gave people instructions as to how to massage  
 9 feet and hands?  
 10 A. I have never given any  
 11 instructions. I have shown where pressure  
 12 points are on a hand and on a foot, but I  
 13 have never given instructions on how to do  
 14 it. I have demonstrated where a pressure  
 15 point on a hand and a foot is.  
 16 Q. Did you do that demonstration with  
 17 people who were giving or were planning to  
 18 give Mr. Epstein massages?  
 19 MR. PAGLIUCA: Objection to form  
 20 and foundation.  
 21 A. No, just in general, something  
 22 that I know how to do, so it would be just as  
 23 a general thing I have done.  
 24 Q. When you talk about general thing  
 25 you have done, is to tell people where the

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1 G. Maxwell - Confidential  
 2 pressure points are on hands and feet?  
 3 A. Yes.  
 4 Q. Did you ever use that knowledge to  
 5 try to show someone who was giving or was  
 6 planning to give Mr. Epstein a massage how to  
 7 do it?  
 8 MR. PAGLIUCA: Objection to form  
 9 and foundation. Asked and answered.  
 10 A. I am not aware of ever having done  
 11 that, but I am aware of having shown people  
 12 that there is a pressure point on the hand  
 13 and foot. I have no specific knowledge of  
 14 who. Just in general, I have done it.  
 15 Q. Did you show people pressure points  
 16 on hands and feet in Mr. Epstein's house in  
 17 Palm Beach?  
 18 A. I don't recall with specificity  
 19 where. I just know I do it because it's just  
 20 something that I happen to know, it helps  
 21 people, something I know.  
 22 Q. What I'm trying to be sure that I  
 23 have your testimony on is whether at any of  
 24 Mr. Epstein's properties, whether you call it  
 25 instructions or not, told people or showed

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1 G. Maxwell - Confidential  
 2 people how to give massage. Did you do that?  
 3 A. I have not done that.  
 4 Q. Did you ever tell or show people  
 5 how to give Mr. Epstein a massage?  
 6 A. No.  
 7 Q. Did you ever tell or show people at  
 8 Mr. Epstein's properties how to give  
 9 massages?  
 10 A. No.  
 11 Q. Did you at any time, at any of  
 12 Mr. Epstein's properties, tell or show anyone  
 13 how to give massages or how Mr. Epstein liked  
 14 massages?  
 15 MR. PAGLIUCA: Objection to form  
 16 and foundation.  
 17 A. No. I think Mr. Epstein is  
 18 perfectly capable --  
 19 MR. PAGLIUCA: There is no question  
 20 pending.  
 21 Q. Did Mr. Epstein, in your presence,  
 22 ever tell or show anyone how he liked  
 23 massages?  
 24 A. I don't recall.  
 25 Q. Did Mr. Epstein ever tell you how

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1 G. Maxwell - Confidential  
 2 he liked or didn't like massages given by any  
 3 particular person?  
 4 A. I can't recall.  
 5 Q. In other words, did he ever praise  
 6 to you or compliment to you some massage that  
 7 he had gotten or some person who had given  
 8 him a massage?  
 9 A. I'm sure in the course of time he  
 10 did, but I can't recall.  
 11 Q. Did he ever complain to you or  
 12 criticize the massage that anyone gave him?  
 13 A. Again, I don't recall.  
 14 Q. You know Sarah Kellen or Sarah  
 15 Kellen Vickers, correct?  
 16 A. I do.  
 17 Q. Did Mr. Epstein, insofar as you  
 18 have any reason to believe, ever engage in  
 19 sexual activities with her?  
 20 A. I have no knowledge.  
 21 Q. Did you ever engage in sexual  
 22 activities with Sarah Kellen Vickers?  
 23 A. No.  
 24 Q. Have you had any conversations with  
 25 Sarah Kellen Vickers about Mr. Epstein's

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1 G. Maxwell - Confidential  
 2 massages or sexual activities?  
 3 MR. PAGLIUCA: Objection to form  
 4 and foundation.  
 5 A. No.  
 6 Q. When was the last time you had any  
 7 communications with Sarah Kellen Vickers?  
 8 A. A long time ago. So long, I don't  
 9 recall.  
 10 Q. Were you aware that Sarah Kellen  
 11 Vickers was noticed for a deposition in this  
 12 case?  
 13 A. I believe I did know that, yes.  
 14 Q. Did you have any conversations with  
 15 anyone as to whether or not Sarah Kellen  
 16 Vickers would or should show up for that  
 17 deposition?  
 18 MR. PAGLIUCA: Wait a minute, what  
 19 does that have to do with the court's  
 20 order. Don't answer that question.  
 21 Just don't answer it. This is silly.  
 22 MR. BOIES: I actually think it is  
 23 far from silly. I think it goes to an  
 24 obstruction of justice situation that I  
 25 think you would be well advised to allow

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1 G. Maxwell - Confidential  
 2 your client to answer the question on.  
 3 MR. PAGLIUCA: Do you have a good  
 4 faith basis to suggest that she  
 5 suggested that Ms. Kellen not show up at  
 6 her deposition yesterday?  
 7 MR. BOIES: I don't know whether it  
 8 was you, I don't know whether it was  
 9 her, I don't know who did it. What I do  
 10 know is that she didn't show up, and I  
 11 think the evidence will be quite clear  
 12 that your client's testimony about the  
 13 extent of her relationship with Sarah  
 14 Kellen Vickers is not accurate.  
 15 And in that context, I think the  
 16 circumstances under which it turns out  
 17 that she doesn't show up is entirely  
 18 appropriate for examination, but that is  
 19 something that I'm happy to talk to the  
 20 judge about.  
 21 MR. PAGLIUCA: Sure. And I hope  
 22 that you give him some good faith basis  
 23 for the assertions that you are making  
 24 here today, which are wholly improper.  
 25 MR. BOIES: I don't think they are

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1 G. Maxwell - Confidential  
 2 at all improper. I am not making any  
 3 assertions. I'm simply asking  
 4 questions. I'm trying to find out what  
 5 the facts are.  
 6 MR. PAGLIUCA: No, you are not.  
 7 MR. BOIES: Yes, I am. You are  
 8 trying to keep the facts from coming  
 9 out.  
 10 MR. PAGLIUCA: No, I'm not. I'm  
 11 trying to keep this orderly and not  
 12 abusive as to where it is going.  
 13 MR. BOIES: This is so far from  
 14 abusive.  
 15 MR. PAGLIUCA: I think we should  
 16 take a lunch break, given it is noon.  
 17 MR. BOIES: We will do it in a half  
 18 hour, I want to finish this line of  
 19 questioning. I will guarantee we are  
 20 out by 12:30.  
 21 BY MR. BOIES:  
 22 Q. Let me ask you about a few other  
 23 people.  
 24 Nadia Marcinkova, do you know her?  
 25 A. I do.

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1 G. Maxwell - Confidential  
 2 Q. Is she anyone with whom Mr. Epstein  
 3 had sex?  
 4 MR. PAGLIUCA: Objection to form  
 5 and foundation.  
 6 A. I have no idea.  
 7 Q. Is she anyone with whom Mr. Epstein  
 8 engaged in sexual activities?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. I have no personal knowledge.  
 12 Q. When you say you have no personal  
 13 knowledge, what do you mean by personal  
 14 knowledge?  
 15 A. I mean that I've read the police  
 16 reports, so that's the only knowledge I have  
 17 of what Nadia or anybody else has with  
 18 Jeffrey. I have no way of knowing whether  
 19 they did or not. Personal knowledge means  
 20 did I know myself.  
 21 Q. After you saw the police reports  
 22 about Mr. Epstein's relations with Nadia  
 23 Marcinkova, did you ever talk to Mr. Epstein  
 24 about whether or not that police report was  
 25 or was not accurate?

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1 G. Maxwell - Confidential  
 2 A. I have not.  
 3 Q. You did communicate with  
 4 Mr. Epstein after you saw that police report,  
 5 correct?  
 6 MR. PAGLIUCA: Objection to form  
 7 and foundation.  
 8 A. I don't know that's true.  
 9 Q. When did you see the police report?  
 10 MR. PAGLIUCA: If this involves  
 11 communications with me, I'm going to  
 12 instruct you not to answer the  
 13 questions.  
 14 Q. Is it your testimony that the only  
 15 time you saw the police reports was when it  
 16 was shown to you by your counsel?  
 17 A. That's the only time I recollect.  
 18 Q. What?  
 19 A. That's the only time I remember  
 20 seeing it.  
 21 Q. When did your counsel show you the  
 22 police report?  
 23 MR. PAGLIUCA: If you remember, you  
 24 can answer that question.  
 25 A. I don't know. I guess recently,

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1 G. Maxwell - Confidential  
 2 but I don't recall.  
 3 Q. In the last 30 days?  
 4 A. I really don't remember when I saw  
 5 it.  
 6 Q. Was the first time that you saw the  
 7 police report sometime this calendar year  
 8 2016?  
 9 A. I don't remember when I've seen  
 10 them. It's in the course of this latest  
 11 lies.  
 12 Q. What do you mean, in the course of  
 13 this latest lies?  
 14 A. In the course of this defamation  
 15 suit.  
 16 Q. And you may not be able to answer  
 17 this, but if you can, I just want to know.  
 18 When you saw the police report in the course  
 19 of this defamation suit, was it this calendar  
 20 year, that is 2016, sometime?  
 21 A. I don't know, I'm sorry, I have no  
 22 memory.  
 23 Q. When is the last time you had a  
 24 conversation or communication with  
 25 Mr. Epstein?

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1 G. Maxwell - Confidential  
 2 A. A very long time ago.  
 3 Q. How long?  
 4 A. I think two years ago, something  
 5 like that.  
 6 Q. Before this defamation lawsuit?  
 7 A. Excuse me?  
 8 Q. Before this defamation lawsuit?  
 9 A. You are asking if I communicated  
 10 with him before the defamation? What are you  
 11 asking me?  
 12 Q. Have you communicated with  
 13 Mr. Epstein since this defamation lawsuit was  
 14 filed?  
 15 A. I don't believe I have. I haven't  
 16 spoken to him -- no, I don't think so. I  
 17 don't remember when it was filed, no, I don't  
 18 think so.  
 19 Q. By communication, I don't mean just  
 20 speaking to him. I mean writing him a  
 21 letter, email, communicated in any way?  
 22 A. No.  
 23 Q. When you say no, does that mean you  
 24 have not communicated with Mr. Epstein in any  
 25 way since this lawsuit was filed?

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1 G. Maxwell - Confidential  
 2 A. I don't recall any communications  
 3 with him since this lawsuit has been filed.  
 4 Q. Did you ever discuss Sarah Kellen  
 5 Vickers with Mr. Epstein?  
 6 MR. PAGLIUCA: Objection to form  
 7 and foundation.  
 8 A. I would have had conversations with  
 9 him in general terms. Obviously I talked  
 10 about her with him but not in any context of  
 11 this situation. Just I will have talked to  
 12 him about her.  
 13 Q. When was the last time you talked  
 14 to Mr. Epstein about Sarah Kellen Vickers?  
 15 A. Probably in 2003, 2002.  
 16 Q. What was the subject matter of that  
 17 conversation?  
 18 A. I have no idea.  
 19 Q. Did it have anything to do with  
 20 Mr. Epstein's relationship with Sarah Kellen  
 21 Vickers?  
 22 A. No, I have no idea. It would have  
 23 nothing to do with anything other than a  
 24 work-related issue.  
 25 Q. Did Sarah Kellen Vickers work for

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1 G. Maxwell - Confidential  
 2 Mr. Epstein?  
 3 A. I believe she did.  
 4 Q. Was she working for Mr. Epstein in  
 5 2003?  
 6 A. I believe she was.  
 7 Q. What was her job?  
 8 A. I don't exactly know what her job,  
 9 her responsibilities were.  
 10 Q. Do you know any of job  
 11 responsibilities?  
 12 A. I believe she traveled with him and  
 13 help managed the houses and run the staff and  
 14 whatever else he asked her to do. She worked  
 15 for Mr. Epstein, so you would have to ask  
 16 him.  
 17 Q. Was it your understanding that  
 18 Sarah Kellen Vickers at some point had had a  
 19 sexual or romantic relationship with  
 20 Mr. Epstein?  
 21 A. I have no knowledge of that.  
 22 Q. Let me go back to Nadia Marcinkova.  
 23 Did you know, yourself, Nadia Marcinkova?  
 24 A. I met her.  
 25 Q. Where did you meet her?

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1 G. Maxwell - Confidential  
 2 A. I don't recall where I met her, I  
 3 just don't.  
 4 Q. Did you meet her at one of  
 5 Mr. Epstein's properties?  
 6 A. It's possible, but I don't recall  
 7 where I met her.  
 8 Q. Did you ever see Nadia at any of  
 9 Mr. Epstein's properties?  
 10 A. I believe that -- I believe on the  
 11 island, I recall, maybe.  
 12 Q. Virgin Islands?  
 13 A. Virgin Islands.  
 14 Q. Did Nadia work for Mr. Epstein?  
 15 A. I don't know.  
 16 Q. Did Nadia travel with Mr. Epstein?  
 17 A. I don't know. If she was on the  
 18 island, then presumably she did. I don't  
 19 recall.  
 20 Q. Did you ever see Nadia Marcinkova  
 21 at any of Mr. Epstein's properties other than  
 22 in the Virgin Islands?  
 23 A. Not that I recall.  
 24 Q. Leaving aside anything that you  
 25 have learned since this defamation suit

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1 G. Maxwell - Confidential  
 2 started, did you have any reason to believe  
 3 that Mr. Epstein had engaged in sexual  
 4 activities with Nadia Marcinkova?  
 5 MR. PAGLIUCA: Objection to form  
 6 and foundation.  
 7 A. I don't -- I have no idea. It  
 8 wouldn't be something I think about.  
 9 Q. I'm sorry, say that again?  
 10 A. I would have no idea.  
 11 Q. Did Nadia Marcinkova, insofar as  
 12 you were aware, ever give Mr. Epstein a  
 13 massage?  
 14 A. I have no idea.  
 15 Q. Did you ever see her go into the  
 16 massage room?  
 17 A. Not that I recall, no.  
 18 Q. Did you ever tell Nadia Marcinkova  
 19 that Mr. Epstein wanted her in the massage  
 20 room?  
 21 A. No.  
 22 Q. Did you ever have any discussions  
 23 with Mr. Epstein about Nadia Marcinkova?  
 24 A. None.  
 25 Q. Did you ever have any discussions

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1 G. Maxwell - Confidential  
 2 with Nadia Marcinkova about Mr. Epstein?  
 3 A. None.  
 4 Q. Do you know how much money, if any,  
 5 Mr. Epstein paid Nadia Marcinkova?  
 6 A. I have no idea, no, I have no idea.  
 7 Q. Do you know whether Mr. Epstein  
 8 paid Nadia Marcinkova, even if you don't know  
 9 the amount?  
 10 A. No, I would not know that.  
 11 Actually, I don't, I don't recall any  
 12 conversation --  
 13 MR. PAGLIUCA: There is no question  
 14 pending.  
 15 Q. Do you know who Alfredo Rodriguez  
 16 is?  
 17 A. Yes.  
 18 Q. Would you identify him for the  
 19 record?  
 20 A. He is dead.  
 21 Q. Before he died?  
 22 A. He was a butler.  
 23 Q. A butler for whom?  
 24 A. Mr. Epstein in Palm Beach.  
 25 Q. And was he a butler for Mr. Epstein

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1 G. Maxwell - Confidential  
 2 in Palm Beach in the 1990s and 2000s?  
 3 A. I don't believe so.  
 4 Q. When did he become a butler for  
 5 Mr. Epstein?  
 6 A. I believe late -- middle of 2000s.  
 7 2004, 2005, something like that.  
 8 Q. When he became a butler for  
 9 Mr. Epstein, did he work for Mr. Epstein in  
 10 Palm Beach?  
 11 A. I believe he did.  
 12 Q. And did you see Mr. Rodriguez at  
 13 Mr. Epstein's Palm Beach residence while Mr.  
 14 Rodriguez was working as a butler for  
 15 Mr. Epstein?  
 16 A. I was not in Palm Beach when he was  
 17 working for Mr. Epstein.  
 18 Q. I think you answered the question,  
 19 but I want to be absolutely certain. Is it  
 20 your testimony that you never saw  
 21 Mr. Rodriguez at Mr. Epstein's Palm Beach  
 22 residence?  
 23 A. That is not my testimony.  
 24 Q. Did you ever see Mr. Rodriguez at  
 25 Mr. Epstein's Palm Beach residence?

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1 G. Maxwell - Confidential  
 2 A. I'm sure I did because I would have  
 3 seen him. I'm sure I did see him but -- yes,  
 4 I would have seen him.  
 5 Q. When did you see Mr. Rodriguez at  
 6 Mr. Epstein's Palm Beach residence?  
 7 A. If I'm right and I could -- the  
 8 dates are a bit off, Mr. Epstein's mother  
 9 died, I think Mr. Rodriguez was working for  
 10 Mr. Epstein at that time, and I helped with  
 11 the funeral arrangements and I would have  
 12 seen him at that point.  
 13 Q. Other than the one occasion when  
 14 Mr. Epstein's mother died, we can figure out  
 15 what the date of that was --  
 16 A. I don't have all the dates in my  
 17 head.  
 18 Q. Other than the one occasion when  
 19 Mr. Epstein's mother died, did you ever see  
 20 Mr. Rodriguez?  
 21 A. In that period of time when I went  
 22 very infrequently to Palm Beach, I don't know  
 23 how many times, maybe once or twice and had  
 24 he been at the house, I would have seen him,  
 25 so there would have been very few times.

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1 G. Maxwell - Confidential  
 2 Q. Did you see Mr. Rodriguez at Mr.  
 3 Epstein's Palm Beach residence in 2005?  
 4 A. I don't recall going to the house  
 5 in 2005, but if I was there and he was  
 6 working, I would have seen him.  
 7 Q. Do you recall, as you sit here now,  
 8 one way or another, whether you were at Mr.  
 9 Epstein's Palm Beach residence in 2005?  
 10 A. I don't recall going to the house  
 11 in 2005, but if I did go, I would have seen  
 12 him. And if I did go, it would have been  
 13 once, maybe, I maybe went to the house in  
 14 2005, I don't recall.  
 15 Q. If you went to the house in 2005,  
 16 is it your testimony it would have only been  
 17 once?  
 18 A. Sounds about right, maybe twice. I  
 19 was not in Palm Beach in 2005.  
 20 Q. For you to have been at Mr.  
 21 Epstein's house in Palm Beach, you would have  
 22 had to have been in Palm Beach, right?  
 23 A. I would have had to have been in  
 24 Palm Beach to be at his house in Palm Beach,  
 25 of course.

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1 G. Maxwell - Confidential  
 2 Q. So when you say you were not in  
 3 Palm Beach in 2005, does that mean it is your  
 4 testimony you were not at Mr. Epstein's house  
 5 in Palm Beach in 2005?  
 6 A. I don't recall being at Mr.  
 7 Epstein's house in 2005, I don't really  
 8 recall being in Palm Beach in 2005, and if I  
 9 was in Palm Beach in 2005, I may not have  
 10 stayed at his house.  
 11 Q. Is it your testimony that the most  
 12 you would have been at Mr. Epstein's house in  
 13 Palm Beach in 2005 was once or twice, if  
 14 that?  
 15 A. To the best of my recollection,  
 16 that sounds about right. But I really don't  
 17 recall, 2005 is a long time ago, I just don't  
 18 recall.  
 19 Q. You were continuing to work for  
 20 Mr. Epstein in 2005?  
 21 A. I was helping out in just very  
 22 specific areas of staffing of the houses and  
 23 some architectural details and decorating.  
 24 Q. You were getting paid?  
 25 MR. PAGLIUCA: We've gone over

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1 G. Maxwell - Confidential  
 2 this. You don't need to testify about  
 3 this again. We will take it up with the  
 4 judge, if we need to. I let this go on  
 5 for 15 minutes about Palm Beach.  
 6 MR. BOIES: I ask the question, you  
 7 give the instruction, the judge decides.  
 8 Q. In 2005, were you assisting in the  
 9 arranging of massages for Mr. Epstein?  
 10 A. No.  
 11 Q. Not at all is your testimony?  
 12 A. Correct.  
 13 MR. BOIES: This is a good time to  
 14 take a lunch break.  
 15 MR. PAGLIUCA: Okay. I don't  
 16 intend on being here all day, so if you  
 17 have some important questions you want  
 18 to ask, you may want to get to those.  
 19 MR. BOIES: You can walk out any  
 20 time you want.  
 21 MR. PAGLIUCA: We are getting  
 22 close.  
 23 MR. BOIES: The judge will decide  
 24 whether that's appropriate or not.  
 25 MR. PAGLIUCA: We are getting

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1 G. Maxwell - Confidential  
 2 close.  
 3 THE VIDEOGRAPHER: It's 12:15 p.m.  
 4 and we are going off the record.  
 5 (Whereupon, a luncheon recess was  
 6 taken at 12:15 p.m.)  
 7  
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1 G. Maxwell - Confidential  
 2 AFTERNOON SESSION  
 3 (Time noted: 1:16 p.m.)  
 4  
 5 GHISLAINE MAXWELL,  
 6 resumed and testified as follows:  
 7  
 8 THE VIDEOGRAPHER: The time is 1:16  
 9 p.m., and we are back on the record.  
 10 This also begins DVD No. 5.  
 11 MR. PAGLIUCA: One housekeeping  
 12 matter before you get started. The  
 13 original deposition was as confidential  
 14 and we would designate this continued  
 15 deposition as confidential as well.  
 16 MR. BOIES: Okay.  
 17 Let me ask you to look at a  
 18 document that has been marked as Maxwell  
 19 Deposition Exhibit 28. This is another  
 20 list of names.  
 21 (Maxwell Exhibit 28, List of names,  
 22 marked for identification, as of this  
 23 date.)  
 24 Q. What I would ask you to do is to  
 25 identify the names that are here that you do

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1 G. Maxwell - Confidential  
 2 not recognize. That is, I think you will  
 3 recognize most of the names --  
 4 MR. POTTINGER: Excuse me one  
 5 second.  
 6 Q. What I was saying was that I would  
 7 like you to look at the names here and tell  
 8 me which names you do not recognize.  
 9 A. I pretty much recognize these  
 10 names. I don't know everybody very well, but  
 11 I recognize the names.  
 12 Q. You know who they are?  
 13 A. I don't know if I know who they  
 14 are. I recognize the names.  
 15 Q. Are most of the people on this list  
 16 people that you've met before?  
 17 MR. PAGLIUCA: Objection to form  
 18 and foundation.  
 19 A. I believe I've met pretty much  
 20 everybody on this list.  
 21 Q. Who on the list have you not met?  
 22 A. I think I met them all.  
 23 Q. Now, were all of these people  
 24 people that at one time or another you were  
 25 with with Mr. Epstein?

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1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to form  
 3 and foundation.  
 4 A. I believe so.  
 5 Q. Were any of these people on the  
 6 list, obviously leaving aside Mr. Epstein  
 7 himself, people who, to your knowledge,  
 8 received massages at one or more of Mr.  
 9 Epstein's properties?  
 10 MR. PAGLIUCA: Objection to form  
 11 and foundation.  
 12 A. I couldn't say.  
 13 Q. Are there any people on this list  
 14 who you have reason to believe received  
 15 massages at one or more of Mr. Epstein's  
 16 properties?  
 17 MR. PAGLIUCA: Objection to form  
 18 and foundation.  
 19 A. I couldn't say.  
 20 Q. Just to be clear, my most recent  
 21 question is whether any of the people on this  
 22 list are people who you have reason to  
 23 believe received massages at one of Mr.  
 24 Epstein's properties?  
 25 MR. PAGLIUCA: Same objection.

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1 G. Maxwell - Confidential  
 2 A. I couldn't say.  
 3 Q. Why can't you say?  
 4 A. Because I just don't know.  
 5 Q. Well, you know whether you have a  
 6 reason to believe, correct?  
 7 MR. PAGLIUCA: Objection to form  
 8 and foundation.  
 9 A. These are events that took place 17  
 10 years ago, and I really do not know. It is  
 11 possible that people on that list got a  
 12 massage, it's also possible they didn't. I  
 13 really don't know, leaving aside, of course,  
 14 Mr. Epstein himself.  
 15 Q. Yes.  
 16 MR. PAGLIUCA: One second, I'm  
 17 getting text messages.  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 Q. Are there any names on this list  
 23 that you have reason to believe Mr. Epstein  
 24 engaged in sexual activities with?  
 25 MR. PAGLIUCA: Objection to form

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1 G. Maxwell - Confidential  
 2 and foundation.  
 3 A. Eva Anderson was his girlfriend.  
 4 Q. I am sorry?  
 5 A. Eva Anderson was his girlfriend.  
 6 Q. When was Eva Anderson Mr. Epstein's  
 7 girlfriend?  
 8 A. I don't know the dates, but I  
 9 believe in the '80s.  
 10 Q. In the 1980s?  
 11 A. Yeah, and part of the 1990s, I  
 12 believe. So I don't know when they started  
 13 and when they ended. They were in a  
 14 long-term relationship.  
 15 Q. Was Mr. Epstein engaged in sexual  
 16 activities with Eva Anderson during the  
 17 period of time that you were involved with  
 18 Mr. Epstein?  
 19 A. I wouldn't know.  
 20 Q. How old was Eva Anderson when she  
 21 was first involved with Mr. Epstein?  
 22 A. I don't know.  
 23 Q. How old was Eva Anderson when you  
 24 first met her?  
 25 A. I don't recall.

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1 G. Maxwell - Confidential  
 2 Q. Did any of the people on this list,  
 3 other than Mr. Epstein himself, and the list  
 4 is Exhibit 28, ever ask you to arrange a  
 5 massage?  
 6 MR. PAGLIUCA: Objection to form  
 7 and foundation.  
 8 A. Not that I recall.  
 9 Q. Did you arrange a massage for any  
 10 of the people on this list other than  
 11 Mr. Epstein?  
 12 A. Not that I recall.  
 13 Q. Were any of the people on this  
 14 list, other than Mr. Epstein, given a massage  
 15 at any of Mr. Epstein's residences?  
 16 MR. PAGLIUCA: Objection to form  
 17 and foundation. Asked and answered.  
 18 A. I wouldn't know.  
 19 Q. Did any of the people on this list,  
 20 other than Mr. Epstein, engage in sexual  
 21 activities with anyone at Mr. Epstein's  
 22 properties?  
 23 MR. PAGLIUCA: Objection to form  
 24 and foundation.  
 25 A. I wouldn't know.

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1 G. Maxwell - Confidential  
 2 Q. When you say I wouldn't know, I  
 3 take it you mean to include that you  
 4 testified that you do not know, is that  
 5 correct?  
 6 MR. PAGLIUCA: Objection to form  
 7 and foundation.  
 8 A. I would have no knowledge. I have  
 9 no knowledge of what you are asking me.  
 10 Q. Did you ever have conversations  
 11 with anyone that were intended to convince  
 12 them to engage in sexual activities with  
 13 Mr. Epstein?  
 14 MR. PAGLIUCA: Objection to form  
 15 and foundation. This has been asked and  
 16 answered in her previous deposition, by  
 17 the way.  
 18 A. No.  
 19 Q. Did you ever tell anyone that  
 20 Mr. Epstein was a scout for Victoria's  
 21 Secret?  
 22 A. I don't recall saying that.  
 23 Q. Did you ever tell anyone that  
 24 Mr. Epstein could get them a job with  
 25 Victoria's Secret?

1 G. Maxwell - Confidential  
 2 [REDACTED]

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1 G. Maxwell - Confidential  
 2 A. I don't recall saying that.  
 3 Q. Do you deny saying that, or do you  
 4 simply say you don't recall, one way or  
 5 another, whether you said it?  
 6 MR. PAGLIUCA: This is outside the  
 7 court's order, so I will tell you not to  
 8 answer this, and we will take it up with  
 9 the judge.  
 10 [REDACTED]

1 G. Maxwell - Confidential  
 2 [REDACTED]



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[Redacted text block]

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G. Maxwell - Confidential

[Redacted text block]

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G. Maxwell - Confidential

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1  
2

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[Redacted text block]

15 Q. Was there anything that occurred  
16 that led you to conclude that you didn't want  
17 to be there anymore?

18 A. I ceased to be happy in the job and  
19 I ceased to be happy spending time with  
20 Mr. Epstein.

21 Q. Was there anything that happened  
22 that you can identify that caused you to  
23 cease to be happy spending time with  
24 Mr. Epstein?

25 A. He became more difficult to work

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1 G. Maxwell - Confidential  
 2 with.  
 3 Q. Was there any particular aspect of  
 4 that that you can identify now?  
 5 A. Just general. Just doesn't work.  
 6 Q. Let me focus on Mr. Brunel. Now,  
 7 you testified that you have no reason to  
 8 believe that Mr. Brunel engaged in sexual  
 9 activities with anyone at any of Mr.  
 10 Epstein's residences, is that correct?  
 11 A. I would have no knowledge of that.  
 12 Q. Did you ever see Mr. Brunel engage  
 13 in sexual activities with anyone?  
 14 A. I did not.  
 15 Q. Did you ever see Mr. Brunel taking  
 16 photographs of people engaged in sexual  
 17 activities?  
 18 A. I did not.  
 19 Q. I apologize for getting into  
 20 something that is kind of an intimate area,  
 21 but I need to establish this, in part because  
 22 it relates to patterns of conduct, and I need  
 23 to ask you some questions about your sexual  
 24 activities with Mr. Epstein.  
 25 A. Okay.

1 G. Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 Q. Did you ever have conversations  
 8 with anyone who was engaged in sexual  
 9 activities with Mr. Epstein about those  
 10 sexual activities?  
 11 MR. PAGLIUCA: Objection to form  
 12 and foundation.  
 13 A. I never had those conversations.  
 14 Q. So would it be your testimony that  
 15 you never had any conversations about Mr.  
 16 Epstein's sexual activities with Nadia  
 17 Marcinkova?  
 18 A. I have never talked about sex with  
 19 Nadia at any point. I have hardly ever  
 20 spoken to her.  
 21 Q. Would your testimony be the same  
 22 with respect to Sarah Kellen Vickers?  
 23 A. That would be true, correct, I have  
 24 not.  
 25 Q. And Virginia Roberts?

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1 G. Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 G. Maxwell - Confidential  
 2 A. Of course not.  
 3 Q. Were there any young men that, to  
 4 your knowledge, would bring women over to  
 5 Mr. Epstein's residences to perform services  
 6 for Mr. Epstein?  
 7 MR. PAGLIUCA: Objection to form  
 8 and foundation.  
 9 A. Can you repeat the question,  
 10 please?  
 11 Q. Were there any young men that, to  
 12 your knowledge, would bring women over to  
 13 Mr. Epstein's residences to perform services  
 14 for Mr. Epstein?  
 15 A. I have no idea what you are talking  
 16 about, I'm sorry.  
 17 Q. I'm talking about whether there  
 18 were any young men that brought women over to  
 19 Mr. Epstein's residence to perform services?  
 20 A. I can't think of a single man in  
 21 that context that I've ever met.  
 22 Q. You testified earlier that you did  
 23 not recall ever meeting Tony Figueroa, is  
 24 that correct?  
 25 A. I don't believe I ever have.

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1 G. Maxwell - Confidential  
 2 Q. Insofar as you were aware, did  
 3 Virginia Roberts ever have a male friend that  
 4 visited her at the Epstein residences?  
 5 A. I don't recall ever seeing a man  
 6 with Virginia. I believe she had a fiance  
 7 that I was aware of, I think, but that's all.  
 8 Q. When were you aware that Virginia  
 9 Roberts had a fiance?  
 10 A. I can't say I became aware from  
 11 reading all this stuff, or I was aware of it  
 12 at the time. I don't know.  
 13 Q. Did you ever meet Virginia Roberts'  
 14 fiance?  
 15 A. I don't think I ever did. I don't  
 16 recall meeting any men with Virginia.  
 17 Q. Do you know [REDACTED],  
 18 [REDACTED]  
 19 A. I never heard that name before.  
 20 Q. Have you ever heard the name of  
 21 Carolyn Andriamo, A-N-D-R-I-A-M-O?  
 22 A. I don't recollect that name at all.  
 23 MR. PAGLIUCA: Mr. Boies, those  
 24 names are on Exhibit 26, which we have  
 25 already gone over and she said she

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1 G. Maxwell - Confidential  
 2 didn't recognize those people, so now we  
 3 are just repeating things that we went  
 4 over.  
 5 MR. BOIES: I am in the context of  
 6 seeing if I can refresh her  
 7 recollection, because these are women  
 8 that Mr. Figueroa, who she also does not  
 9 recall, brought over to Mr. Epstein's  
 10 residences, and I also want to make a  
 11 very clear record of what her testimony  
 12 is and is not right now.  
 13 Again, you can instruct her not to  
 14 answer if you wish.  
 15 MR. PAGLIUCA: I'm trying to get to  
 16 nonrepetitive questions here. You  
 17 basically asked the same question three  
 18 times. Then we get a pile of notes that  
 19 get pushed up to you, you read those.  
 20 Then you ask those three times, and then  
 21 we go to another question. So it's  
 22 taking an inordinately long amount of  
 23 time and it shouldn't.  
 24 MR. BOIES: I think that is a  
 25 demonstrably inaccurate statement of

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1 G. Maxwell - Confidential  
 2 what has been going on, and I  
 3 attribute -- maybe I shouldn't attribute  
 4 it at all.  
 5 But if you want to instruct not to  
 6 answer, instruct not to answer. If you  
 7 don't, again, all I will do is request  
 8 that you cease your comments. I can't  
 9 do that. All I can do is seek sanctions  
 10 afterwards.  
 11 BY MR. BOIES:  
 12 Q. Ms. Maxwell.  
 13 A. Mr. Boies.  
 14 Q. What?  
 15 A. I'm replying. You said Ms.  
 16 Maxwell, I said Mr. Boies.  
 17 Q. Do you have a question?  
 18 A. No.  
 19 Q. I have a question.  
 20 A. I'm sure you do.  
 21 Q. During the time that you were in  
 22 the property or at the property that  
 23 Mr. Epstein has in the Virgin Islands, were  
 24 you aware of Mr. Epstein getting any  
 25 massages?

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1 G. Maxwell - Confidential  
 2 A. He did receive massages at the  
 3 Virgin Islands property.  
 4 Q. From whom did he receive massages  
 5 at the Virgin Islands?  
 6 A. There is a professional masseuse  
 7 and masseur that came from St. Thomas.  
 8 Q. This was somebody who came over  
 9 from St. Thomas for the day to give massages  
 10 and then left, or was that person a resident?  
 11 A. I believe, from memory, they came  
 12 over, gave a massage and left.  
 13 Q. And who arranged for this person to  
 14 come over from St. Thomas?  
 15 A. Probably the staff at the island.  
 16 Q. But you don't know?  
 17 A. The staff of the island would have  
 18 made those arrangements.  
 19 Q. Who at the staff?  
 20 A. Whoever would have been running the  
 21 island at that period of time.  
 22 Q. Do you know who that was?  
 23 A. I'm sorry, in this moment I can't  
 24 think of the names of the people who worked  
 25 on the island.

Confidential

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1 G. Maxwell - Confidential  
 2 Q. Did you ever arrange for anyone to  
 3 give Mr. Epstein a massage at his Virgin  
 4 Island property?  
 5 A. I don't recall if I ever made a  
 6 call to the massage people in St. Thomas. I  
 7 don't recall.  
 8 Q. Did Mr. Epstein ever receive  
 9 massages at his Virgin Island property from  
 10 people that he had brought with him on his  
 11 plane from the United States?  
 12 MR. PAGLIUCA: Objection to form  
 13 and foundation.  
 14 A. I don't know.  
 15 Q. Did you ever participate in  
 16 arranging for a massage for Mr. Epstein by  
 17 someone who had been brought to the island on  
 18 Mr. Epstein's plane?  
 19 A. My memory of the massages on the  
 20 island were from people who came from St.  
 21 Thomas.  
 22 Q. Does that mean that you never  
 23 participated in arranging for a massage for  
 24 Mr. Epstein at his Virgin Island property to  
 25 be given by someone who had been brought to

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1 G. Maxwell - Confidential  
 2 the island on Mr. Epstein's plane?  
 3 MR. PAGLIUCA: Objection to form  
 4 and foundation.  
 5 A. I don't recall, I have no idea.  
 6 Q. Mr. Epstein did bring women to his  
 7 Virgin Island property on his plane from time  
 8 to time, right?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. People came to the island who were  
 12 his guests.  
 13 Q. And some of those guests, as you  
 14 described it, were women, right?  
 15 A. Indeed.  
 16 Q. Did you ever participate in  
 17 arranging for any of the women that came to  
 18 Mr. Epstein's Virgin Island property to  
 19 provide Mr. Epstein with a massage?  
 20 A. No.  
 21 Q. Where on the Virgin Island property  
 22 did Mr. Epstein have his massages?  
 23 A. I believe from memory he had them  
 24 in the master cabana.  
 25 Q. In what?

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1 G. Maxwell - Confidential  
 2 A. It was a cabana, and also he had a  
 3 beach place, a place on the beach where from  
 4 time to time he would...  
 5 Q. Did you ever see Mr. Epstein being  
 6 given a massage in the beach area where he  
 7 from time to time had massages?  
 8 A. I don't have any recollection of a  
 9 specific memory, but it was just on the  
 10 beach, so there wouldn't be any privacy, he  
 11 would just be getting a massage.  
 12 Q. That would be visible to people who  
 13 are on the beach, correct?  
 14 A. It would be, yes.  
 15 Q. Did you, at any time when you were  
 16 there, see Mr. Epstein being given a massage  
 17 in this beach area other than by a  
 18 professional masseuse brought to the island  
 19 from St. Thomas?  
 20 A. I don't have any memory of -- I  
 21 don't have a specific memory of seeing him  
 22 get a massage on the beach. I just have an  
 23 image of a massage on the beach, so I don't  
 24 know who, I have no memory of it.  
 25 Q. Whether or not you have a specific

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1 G. Maxwell - Confidential  
 2 memory of it, do you have a general memory  
 3 that from time to time Mr. Epstein got  
 4 massages down in the beach area?  
 5 A. I have a general memory, I do.  
 6 Q. Do you have a general memory that  
 7 from time to time those massages were given  
 8 to Mr. Epstein by people other than a  
 9 professional masseuse brought to the island  
 10 from St. Thomas?  
 11 MR. PAGLIUCA: Objection to form  
 12 and foundation.  
 13 A. I have no idea who would be giving  
 14 him a massage in that general memory of mine,  
 15 so I can't say. The massages that I recall  
 16 were from people from St. Thomas, and that's  
 17 what I recall.  
 18 Q. Did anyone ever complain to you  
 19 that Mr. Epstein had demanded sex of them?  
 20 MR. PAGLIUCA: Objection to form  
 21 and foundation.  
 22 A. Is that a question?  
 23 Q. Yes.  
 24 A. Never.  
 25 Q. Do you know somebody named Reynaldo

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1 G. Maxwell - Confidential  
 2 Rizzo?  
 3 A. I do not.  
 4 Q. Who is he?  
 5 A. I don't know him -- I know who he  
 6 is now, but he worked, I believe, for Eva and  
 7 Glenn, but prior to --  
 8 Q. Eva and Glenn Dubin?  
 9 A. Yeah.  
 10 Q. It's your testimony you never met  
 11 Mr. Rizzo?  
 12 A. I don't recall ever meeting him.  
 13 Q. Do you remember being at the  
 14 Dubins' residence with Mr. Rizzo and with a  
 15 [REDACTED]  
 16 A. I do not.  
 17 Q. Do you ever remember a [REDACTED]  
 18 [REDACTED] during  
 19 the period of time that you were with  
 20 Mr. Epstein?  
 21 A. I do not.  
 22 Q. Was there ever a time when you were  
 23 at the Dubin residence with a girl under the  
 24 age of 21 who had been with Mr. Epstein?  
 25 MR. PAGLIUCA: Objection to form

1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to form  
 3 and foundation.  
 4 A. No, no.  
 5 Q. Let me see if I can possibly  
 6 refresh your recollection. Do you recall  
 7 being at the Dubin residence with [REDACTED]  
 8 [REDACTED] that was crying and very  
 9 distraught?  
 10 A. I have never seen that.  
 11 Q. Did you ever take the passport of  
 12 any person who had told you that Mr. Epstein  
 13 had demanded sex of them?  
 14 A. No.  
 15 Q. Were you ever at any residence of  
 16 Mr. Epstein's when Alan Dershowitz was  
 17 present?  
 18 A. I'm sure I was.  
 19 Q. Were you at Mr. Epstein's Palm  
 20 Beach residence when Mr. Dershowitz was  
 21 present?  
 22 A. I may have been. It's possible.  
 23 Q. Were you at Mr. Epstein's New  
 24 Mexico property when Mr. Dershowitz was  
 25 present?

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1 G. Maxwell - Confidential  
 2 and foundation.  
 3 A. Can you repeat the question,  
 4 please?  
 5 Q. Sure.  
 6 You remember from time to time  
 7 being at the Dubin residence, correct?  
 8 A. I do.  
 9 Q. And I think you testified that you  
 10 don't remember whether Mr. Rizzo was present  
 11 on any of those occasions, although he might  
 12 have been, correct?  
 13 A. If Mr. Rizzo was standing right  
 14 here in front of me, I wouldn't know who he  
 15 is.  
 16 Q. Does that mean you are saying that  
 17 you never met him or simply that you don't  
 18 remember him?  
 19 A. I don't know if I ever met him, but  
 20 if I saw him in a picture, maybe I would  
 21 recognize it, but I don't believe I'd  
 22 remember him.  
 23 Q. Did you ever go to the Dubin  
 24 residence with some woman who had previously  
 25 been with Mr. Epstein?

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 2 A. I don't have any memory of that,  
 3 but it's possible. I just don't recall it.  
 4 Q. Were you at Mr. Epstein's Virgin  
 5 Islands property when Mr. Dershowitz was  
 6 present?  
 7 A. That I do recall, yes.  
 8 Q. Were you at Mr. Epstein's New York  
 9 property when Mr. Dershowitz was present?  
 10 A. Again, it's possible, but I don't  
 11 have a memory of it.  
 12 Q. How many times do you recall being  
 13 at Mr. Epstein's Virgin Island property when  
 14 Mr. Dershowitz was also present?  
 15 A. I only recall once.  
 16 Q. When was that?  
 17 A. I don't recall the date.  
 18 Q. Who else was present on that time?  
 19 A. I believe his wife and his  
 20 daughter.  
 21 Q. Anyone else?  
 22 A. I don't recall anyone else.  
 23 Q. Anyone else on the whole island. I  
 24 don't just mean with him. I mean did  
 25 Mr. Epstein have other guests with him at

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<p>1 G. Maxwell - Confidential 2 that time? 3 A. I don't recall anybody else. 4 Q. How did you arrive there? 5 A. I don't know. 6 Q. Did you come with Mr. Epstein? 7 A. I don't know, I'm sorry. 8 Q. How did Mr. Dershowitz arrive 9 there? 10 A. Again, I don't know. 11 Q. Did he come with Mr. Epstein? 12 A. I don't know. 13 Q. Other than that one time that you 14 say you were at the Virgin Island property 15 with Mr. Dershowitz, had you ever met 16 Mr. Dershowitz in Mr. Epstein's presence? 17 MR. PAGLIUCA: This is outside of 18 the court's order. I will tell you not 19 to answer that question. 20 THE WITNESS: Okay. 21 Q. Did Mr. Dershowitz ever receive a 22 massage at any of Mr. Epstein's properties? 23 A. I don't recall. 24 Q. Did you ever have any conversations 25 with Mr. Dershowitz?</p>	<p>1 G. Maxwell - Confidential 2 Q. I'm not now asking you about a 3 conversation. 4 A. What are you asking me? Sorry. 5 Q. Do you recall ever seeing 6 Mr. Dershowitz at any of Mr. Epstein's 7 residences other than the Virgin Island 8 property? 9 A. I don't have any specific 10 recollection. 11 Q. Do you have a general recollection? 12 A. I have a general recollection that 13 I have seen him, but I just don't have any 14 other memory of it. I know I met him. I 15 just don't recall where or when, except for 16 that singular event on the island. 17 Q. When you say you have a general 18 recollection that you have seen him, do you 19 mean you have a general recollection that you 20 have seen him at Mr. Epstein's properties 21 other than the Virgin Islands? 22 A. It's just a general recollection, 23 but I have no specific memory of seeing him. 24 Q. All I'm trying to do is find out 25 whether your general recollection is a</p>
<p>Page 167</p> <p>1 G. Maxwell - Confidential 2 MR. PAGLIUCA: You don't have to 3 answer that question. About what, 4 anything? 5 Q. Did you ever have any conversations 6 with Mr. Dershowitz at Mr. Epstein's 7 properties? 8 A. I did, about metal detecting. 9 Q. Anything else? 10 A. I only recall metal detecting. 11 Q. Where did that conversation take 12 place? 13 A. As I was metal detecting. 14 Q. I said where? 15 A. On the island. 16 Q. That's the only conversation that 17 you recall, is that your testimony? 18 A. Yes, that is my testimony. 19 Q. Do you recall ever seeing 20 Mr. Dershowitz at any of Mr. Epstein's 21 residences other than the Virgin Island 22 property? 23 A. That's the only specific memory I 24 have of the conversation that I recall 25 because it was something special.</p>	<p>Page 169</p> <p>1 G. Maxwell - Confidential 2 general recollection of having seen him 3 someplace in the world or whether you have a 4 general recollection of having seen him at 5 Mr. Epstein's properties? 6 A. I'm sorry, I really can't answer. 7 I just don't know. The only memory I have of 8 him is on the island, and I don't have any 9 additional memory of him anywhere else. 10 Q. I mentioned a woman by the name of 11 Caroline before. Are you familiar with a 12 Caroline Casey? And I don't mean to imply 13 they are the same people. 14 A. Is this on any of these lists that 15 you gave me? 16 Q. It could have been on the first 17 list. I don't think so. 18 A. Is it on this list? 19 Q. It's not on the second list. 20 A. So what's your question? 21 Q. Are you familiar with a woman named 22 Caroline Casey? 23 A. I'm familiar with the name, yes. 24 Q. Who is that person? 25 A. I don't recall who she is.</p>

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 2 Q. What is Caroline Casey's connection  
 3 to Mr. Epstein?  
 4 A. I don't know.  
 5 Q. Did you ever speak to Caroline  
 6 Casey?  
 7 A. I don't recall. I know her name,  
 8 and that's all I can -- I don't recall a  
 9 conversation with her. I don't recall who  
 10 she is at this point.  
 11 Q. Was Caroline Casey someone who  
 12 provided massages for Mr. Epstein?  
 13 A. I don't believe so.  
 14 Q. Did Caroline Casey perform any  
 15 services for Mr. Epstein?  
 16 MR. PAGLIUCA: Objection to form  
 17 and foundation.  
 18 A. I have no idea, I'm sorry.  
 19 Q. When did you first become aware of  
 20 charges that Mr. Epstein was having sex with  
 21 a significant number of people at his  
 22 residences?  
 23 MR. PAGLIUCA: You don't have to  
 24 answer that question. It's outside of  
 25 the court's order.

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 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 A. Are you giving me a timeframe here,  
 9 because it's been a long time. I'm assuming  
 10 he is having sexual relations today. You  
 11 have to bind it to some time.  
 12 Q. You don't know who he is having  
 13 sexual relationships with today, do you?  
 14 A. No.  
 15 Q. So you can only tell me who  
 16 Mr. Epstein was having sexual relationships  
 17 with at a time when you knew about it,  
 18 correct?  
 19 A. I have no knowledge of him actually  
 20 having sex with anybody else outside of what  
 21 we have identified, [REDACTED].  
 22 [REDACTED].  
 23 Q. Now, there came a time when you  
 24 learned that people were asserting that he  
 25 had had sexual activities with a lot more

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 2 Q. You have testified that you were  
 3 only aware of a few people that Mr. Epstein  
 4 had sex with or engaged in sexual activities  
 5 with at his residences, correct?  
 6 MR. PAGLIUCA: Objection to form  
 7 and foundation.  
 8 A. I didn't say that.  
 9 Q. How many people are you aware of  
 10 that Mr. Epstein engaged in sexual activities  
 11 with at his residences?  
 12 A. I'm not aware.  
 13 Q. You are aware of some?  
 14 A. Well, the ones that we've  
 15 discussed, but that's all I'm aware of.  
 16 Q. That's my question.  
 17 A. Then I can concur, yes.  
 18 Q. Let's be clear. You have  
 19 identified three people.  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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 2 than those three people at his residences,  
 3 correct? During the period of time that you  
 4 were involved with Mr. Epstein, correct?  
 5 A. Like everybody else, like the rest  
 6 of the world, when it was announced in the  
 7 papers.  
 8 Q. Yes.  
 9 And that was during 2005?  
 10 A. Whenever it was.  
 11 Q. At that point, did you do anything  
 12 to try to find out whether those assertions  
 13 were or were not accurate?  
 14 MR. PAGLIUCA: You don't have to  
 15 answer that. That's outside the court's  
 16 order.  
 17 Q. When you heard that there were  
 18 assertions that Mr. Epstein had engaged in  
 19 sexual activities with people who you had met  
 20 at Mr. Epstein's residences, did you do  
 21 anything to determine whether those  
 22 assertions were or were not accurate?  
 23 MR. PAGLIUCA: Objection to form  
 24 and foundation, and you don't have to  
 25 answer that question. It's outside the

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 2 court's order.  
 3 Q. In terms of preparing for this  
 4 deposition, what documents did you review?  
 5 MR. PAGLIUCA: To the extent I  
 6 provided you with any documents to  
 7 review, I will tell you that's both --  
 8 it's privileged and I instruct you not  
 9 to answer.  
 10 Q. Did your lawyer provide you with  
 11 any documents to review in preparation for  
 12 this deposition that refreshed your  
 13 recollection about any of the events that  
 14 occurred?  
 15 MR. PAGLIUCA: You can answer that  
 16 question.  
 17 A. No.  
 18 Q. How many documents did your lawyer  
 19 provide you with?  
 20 MR. PAGLIUCA: You can answer.  
 21 A. One, I believe.  
 22 Q. One document. Was that a document  
 23 that had been prepared by your attorney, or  
 24 was it a document from the past?  
 25 MR. PAGLIUCA: I will tell you not

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1 G. Maxwell - Confidential  
 2 to answer that question.  
 3 Q. Was the document that your attorney  
 4 showed you a document that you had ever seen  
 5 before?  
 6 MR. PAGLIUCA: Again, don't answer  
 7 questions about what I showed you or  
 8 didn't show you.  
 9 She already testified that nothing  
 10 refreshed her recollection.  
 11 MR. BOIES: I don't have to accept  
 12 that answer. I can ask these questions,  
 13 and I think these are clearly not  
 14 privileged questions.  
 15 Q. Do you know a [REDACTED]  
 16 A. I do.  
 17 Q. Who is [REDACTED]  
 18 A. She was a friend of Jeffrey's.  
 19 Q. Was [REDACTED] someone with whom  
 20 Mr. Epstein engaged in sexual activities?  
 21 MR. PAGLIUCA: Objection to form  
 22 and foundation.  
 23 A. I don't know.  
 24 Q. Did you ever have any reason to  
 25 believe that Mr. Epstein was engaged in

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1 G. Maxwell - Confidential  
 2 sexual activities with [REDACTED]  
 3 MR. PAGLIUCA: Objection to form  
 4 and foundation.  
 5 A. I didn't have any reason -- I had  
 6 no idea whether they were or weren't.  
 7 Q. Were you with Mr. Epstein in 2005  
 8 when the Palm Beach police launched their  
 9 investigation?  
 10 MR. PAGLIUCA: You don't have to  
 11 answer the question. That's outside the  
 12 court's order.  
 13 Q. When the Palm Beach police launched  
 14 their investigation in 2005, did you make any  
 15 effort to retain records of the women who had  
 16 been present at Mr. Epstein's residences in  
 17 the prior period?  
 18 MR. PAGLIUCA: Don't answer that  
 19 question. It's outside the court's  
 20 order.  
 21 Q. When the Palm Beach police launched  
 22 their investigation in 2005, were you aware  
 23 of any effort to destroy records of women who  
 24 had been present at Mr. Epstein's residences  
 25 in the prior period?

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1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: Don't answer that  
 3 question. It's outside the court's  
 4 order.  
 5 Q. In 2005, were you aware of any  
 6 effort to destroy records of messages you had  
 7 taken of women who had called Mr. Epstein in  
 8 the prior period?  
 9 MR. PAGLIUCA: Don't answer that  
 10 question. It's outside the court's  
 11 order.  
 12 MR. BOIES: I said I would give you  
 13 a break every hour. It's been an hour.  
 14 MR. PAGLIUCA: Do you want a break  
 15 or do you want to keep going?  
 16 THE WITNESS: Keep going.  
 17 MR. BOIES: What I told you before,  
 18 you asked for a break every hour. I am  
 19 happy to give you a break at a fixed  
 20 time. What I'm not happy to do is  
 21 interrupt a chain of examination.  
 22 So if you want a break now, we will  
 23 take a break now. If you don't want a  
 24 break now, we will not break for another  
 25 hour.



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 2 MR. PAGLIUCA: Is there a rule that  
 3 you can point me to that mandates that  
 4 you get to control the time and place of  
 5 breaks?  
 6 MR. BOIES: No. We will take a  
 7 break now, because if what you are going  
 8 to do is say, you said at the very  
 9 beginning of this thing that you wanted  
 10 to have a rule that every hour we took a  
 11 break, and I said that was fine with me,  
 12 but I just didn't want you taking a  
 13 break, particularly since you reserve  
 14 the right to talk to your client during  
 15 breaks, in the middle of an examination.  
 16 Now you are saying let's continue  
 17 for a while but I am not agreeing to  
 18 continue for the next hour. We will  
 19 take a break, and we will come back and  
 20 we will go from there.  
 21 MR. PAGLIUCA: We will take a break  
 22 at your request now, and then if I want  
 23 to take a break, we will take another  
 24 break.  
 25 MR. BOIES: If you take a break to

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1 G. Maxwell - Confidential  
 2 talk to your witness, I guarantee you  
 3 there will be a motion for sanctions. I  
 4 think what you're doing with this  
 5 witness is inappropriate. I think your  
 6 instructions not to answer,  
 7 conversations that you had with her  
 8 while she is under oath and under  
 9 examination is inappropriate.  
 10 THE VIDEOGRAPHER: It's 2:18 p.m.,  
 11 and we are off the record.  
 12 (Recess.)  
 13 THE VIDEOGRAPHER: The time is 2:28  
 14 p.m. This also begins DVD No. 6.  
 15 BY MR. BOIES:  
 16 Q. Let me hand you a document that has  
 17 been previously marked as Maxwell Exhibit 13.  
 18 And I would like you to turn to page 91 of  
 19 that exhibit. And you see the heading that  
 20 says, "Massage-Florida"?  
 21 A. Actually, I don't -- yes, I do,  
 22 sorry.  
 23 Q. Then you see a list of telephone  
 24 numbers with names?  
 25 A. I do.

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1 G. Maxwell - Confidential  
 2 Q. I would like to go down those names  
 3 and see if any of those people are people  
 4 that you recognize. However you think is  
 5 best, we can go name by name, or you can tell  
 6 me which ones you recognize and which ones  
 7 you don't.  
 8 A. I recognize Sherrie. I recognize  
 9 Allison Chambers. Caroline Casey. These are  
 10 names that ring bells, nothing else.  
 11 Dara. I recognize the name.  
 12 Q. Where is Dara?  
 13 A. Dara Preece. I just recognize  
 14 these names. It doesn't mean anything else.  
 15 I'm just recognizing names.  
 16 Gwendolyn Beck.  
 17 Let me do it again and make sure I  
 18 didn't miss anyone. That's it.  
 19 Q. Now, with respect to the people  
 20 that you say you recognized the names of,  
 21 Sherrie Lynch, Allison chambers, Caroline  
 22 Casey, Dara Preece and Gwendolyn Beck, were  
 23 any of those people, people who provided  
 24 massages to Mr. Epstein?  
 25 MR. PAGLIUCA: Objection to form

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 2 and foundation.  
 3 A. Sorry, I guess. I believe Sherrie  
 4 did, and I believe -- I think that's it that  
 5 I know of, I think.  
 6 Q. Now, just going down the names of  
 7 people that you did not recognize, I take it  
 8 you are not aware or recognize the name [REDACTED]  
 9 first name?  
 10 A. It was just a first name. I can't  
 11 think of a [REDACTED] at this point.  
 12 Q. The same thing is true for [REDACTED]  
 13 A. I don't recognize [REDACTED]  
 14 Q. And [REDACTED]  
 15 A. I don't recognize [REDACTED]  
 16 Q. And Joanne?  
 17 A. Is that Johanna? Where is that?  
 18 That's Johanna, I'm sorry, I missed her.  
 19 That would probably be Johanna Sieberg.  
 20 I think [REDACTED] might have been a  
 21 masseuse as well. There is a [REDACTED] in the  
 22 back of my head.  
 23 Q. Amy Birse?  
 24 A. I don't know who that is.  
 25 Q. What about Melissa Hanes?

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1 G. Maxwell - Confidential  
 2 A. No.  
 3 Q. What about [REDACTED]  
 4 A. No.  
 5 Q. [REDACTED]  
 6 A. No.  
 7 Q. [REDACTED]  
 8 A. I didn't think I know a [REDACTED]  
 9 period.  
 10 Q. [REDACTED]  
 11 A. No.  
 12 Q. Is that Virginia?  
 13 A. I don't know what that is.  
 14 Q. Then there is a [REDACTED] or [REDACTED]  
 15 Do you see that?  
 16 A. I don't see that.  
 17 Q. It's right after Virginia, which is  
 18 right after [REDACTED]  
 19 A. I see it. I don't know who that  
 20 is.  
 21 Q. How about [REDACTED]  
 22 A. No idea.  
 23 Q. There is someone here [REDACTED] and  
 24 described as a redhead?  
 25 A. I don't know who that is.

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1 G. Maxwell - Confidential  
 2 Q. Melanie?  
 3 A. No.  
 4 Q. And there is a Melanie Haynes?  
 5 A. I don't know.  
 6 Q. [REDACTED]  
 7 A. No idea.  
 8 Q. Then there is Caroline Andriano?  
 9 A. That's a name that keeps coming up.  
 10 I recognize the name, but I don't know her in  
 11 particular.  
 12 Q. What about Dominique Kelly?  
 13 A. I have no idea who that is.  
 14 Q. Mary Southwell?  
 15 A. No idea.  
 16 Q. Somebody that's listed as  
 17 [REDACTED], Virginia's friend?  
 18 A. No.  
 19 Q. Diane Cahill, do you know who that  
 20 is?  
 21 A. No.  
 22 Q. How about [REDACTED] Tony's friend?  
 23 A. No.  
 24 Q. Do you know who Tony is?  
 25 A. No.

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1 G. Maxwell - Confidential  
 2 Q. Next one is [REDACTED] --  
 3 A. Tony is Virginia's guy that you  
 4 asked me about. I don't know Tony.  
 5 Q. I asked you about a Tony Figueroa.  
 6 A. Right, I don't know him, so I'm  
 7 guessing, I don't know him.  
 8 Q. [REDACTED]  
 9 A. No.  
 10 Q. [REDACTED]  
 11 A. No.  
 12 Q. [REDACTED]  
 13 A. I don't know who these people are.  
 14 Q. Was there a list that was kept of  
 15 women or girls who provided massages?  
 16 MR. PAGLIUCA: This has been  
 17 previously deposed on. This is not part  
 18 of the court's order, I will tell her  
 19 not to answer.  
 20 MR. BOIES: You are going to tell  
 21 her not to answer a question that says  
 22 was there a list of women or girls who  
 23 provided massages?  
 24 MR. PAGLIUCA: She has been  
 25 previously deposed on this subject.

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1 G. Maxwell - Confidential  
 2 MR. BOIES: I think this is  
 3 squarely in the court's order, but if  
 4 you instruct her not to answer, you  
 5 instruct her not to answer.  
 6 MR. PAGLIUCA: We'll find out.  
 7 BY MR. BOIES:  
 8 Q. I take it you don't know the ages  
 9 of any of these people?  
 10 A. The ones that I did recognize were  
 11 roughly my age. The ones I don't know, I  
 12 wouldn't have a clue.  
 13 Q. Did you, or insofar as you are  
 14 aware anyone, maintain a list of females that  
 15 provided massage services to Mr. Epstein at  
 16 his residences?  
 17 MR. PAGLIUCA: Objection to form  
 18 and foundation.  
 19 You can answer if you can.  
 20 A. I don't know anything about a list.  
 21 Q. Let me go back to Exhibit 28. I  
 22 want to go down this list, excluding  
 23 Mr. Epstein himself, and just ask you a  
 24 series of the same essential questions about  
 25 each one.

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1 G. Maxwell - Confidential  
 2 Tila Davies, which of Mr. Epstein's  
 3 residences did you see Tila Davis at?  
 4 A. I don't have a memory of Tila,  
 5 where I would have seen her.  
 6 Q. Did you see her at some residence  
 7 or property?  
 8 A. I did.  
 9 Q. Of Mr. Epstein?  
 10 A. I did.  
 11 Q. You just can't remember which ones,  
 12 is that fair?  
 13 A. Yes, that's fair.  
 14 Q. Tiffany Gramza, which residences of  
 15 Mr. Epstein did you see Tiffany at?  
 16 A. I don't actually recall meeting  
 17 Tiffany, so I can't recall.  
 18 Q. So Tiffany Gramza may be somebody  
 19 who you never met, is that your testimony?  
 20 A. No, I'm not saying that. I just  
 21 don't recall her really at all. I'm sorry, I  
 22 don't recall.  
 23 Q. Did you see Tiffany at some  
 24 residence or property of Mr. Epstein?  
 25 A. I don't recall.

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1 G. Maxwell - Confidential  
 2 Q. Clara Hazel, what properties of  
 3 Mr. Epstein did you see Clare Hazel at?  
 4 A. Palm Beach, and I believe New  
 5 Mexico and New York.  
 6 Q. And Melinda Luntz?  
 7 A. Palm Beach, I believe.  
 8 Q. And what was Melinda Luntz doing at  
 9 Palm Beach when you saw her?  
 10 A. If I remember correctly, she was a  
 11 real estate broker.  
 12 Q. Did you see Melinda Luntz at  
 13 Mr. Epstein's Virgin Island property?  
 14 A. I don't recall.  
 15 Q. When you saw Clare Hazel in Palm  
 16 Beach and New Mexico and New York, what was  
 17 she doing?  
 18 A. I don't know.  
 19 Q. Do you know why she was there?  
 20 A. I think she was just a friend.  
 21 Q. A friend of Mr. Epstein's?  
 22 A. Yeah.  
 23 Q. Alexia Wallaert, what Epstein  
 24 properties did you see her at?  
 25 MR. PAGLIUCA: I will now tell you

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1 G. Maxwell - Confidential  
 2 not to answer these questions anymore.  
 3 These do not appear -- I let this go on,  
 4 they don't appear to be tied to the  
 5 court's order as relating to sex or  
 6 massages or anything that's contained in  
 7 the order. This is just simply what was  
 8 somebody doing at some property at some  
 9 point in time. So don't answer these  
 10 questions.  
 11 Q. It is your assertion that, leaving  
 12 Mr. Epstein aside, none of the people on this  
 13 list engaged in sexual activities with either  
 14 you or Mr. Epstein, correct?  
 15 MR. PAGLIUCA: Objection to form  
 16 and foundation.  
 17 A. I can only testify to myself. I  
 18 cannot testify to Mr. Epstein.  
 19 Q. With respect to Mr. Epstein, do you  
 20 know, one way or another, whether any of  
 21 these people engaged in sexual activities?  
 22 A. With respect to Mr. Epstein, how  
 23 would I know that?  
 24 Q. The answer is lots of ways, but all  
 25 I can do is ask you whether you know it or

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1 G. Maxwell - Confidential  
 2 not.  
 3 A. I don't.  
 4 Q. Do you have any reason to believe  
 5 -- because I don't want to get stuck on your  
 6 concept of personal knowledge -- do you have  
 7 any reason to believe that any of the people  
 8 on this list had sexual activities with  
 9 Mr. Epstein?  
 10 A. I do not.  
 11 Q. Do you have any reason to believe  
 12 that any of these people had massages at any  
 13 Epstein property?  
 14 A. I have no idea. It's entirely  
 15 possible, but I have no idea.  
 16 Q. Do you have any reason to believe  
 17 that any of the people on this list, other  
 18 than Mr. Epstein himself, engaged in sexual  
 19 activities with anyone on Mr. Epstein's  
 20 properties?  
 21 A. I have no reason to believe that.  
 22 Q. Let me go to the Dubin residence.  
 23 I asked you some questions about the Dubin  
 24 residence earlier and about a possible visit  
 25 to that residence of a [REDACTED]. Do you

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1 G. Maxwell - Confidential  
 2 recall that subject generally?  
 3 A. I recall you asking me a question  
 4 about it, yes, I do.  
 5 Q. Let me ask about another time at  
 6 the Dubin residence. Were you ever at the  
 7 Dubin residence with people who worked at the  
 8 Epstein residence?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. No.  
 12 Q. Were you ever at the Dubin  
 13 residence when there were a number of females  
 14 under the age of 21 dancing?  
 15 A. Excuse me?  
 16 Q. Were you ever at the Dubin  
 17 residence when there were a number of females  
 18 under the age of 21 dancing?  
 19 A. The only people I have seen dancing  
 20 at any Dubin residence are [REDACTED]  
 21 Q. Just those [REDACTED], no other  
 22 [REDACTED]?  
 23 A. No other [REDACTED]  
 24 Q. Were you ever at the Dubin  
 25 residence when females who you had seen at

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1 G. Maxwell - Confidential  
 2 the residences of Mr. Epstein, leaving aside  
 3 [REDACTED] were present and dancing?  
 4 A. Can you ask me the question again?  
 5 Q. Sure. I'm focusing on the Dubin  
 6 residence, and I'm focusing on children other  
 7 than [REDACTED]  
 8 A. I'm there.  
 9 Q. I'm asking whether you were ever at  
 10 the Dubin residence where there were females  
 11 other than [REDACTED] who were  
 12 dancing.  
 13 A. I've never witnessed --  
 14 MR. PAGLIUCA: Objection to form  
 15 and foundation.  
 16 A. Other than [REDACTED], who I have  
 17 certainly seen dancing, I don't recall any  
 18 dancing at Eva and Glenn's residences by any  
 19 other people.  
 20 MR. BOIES: I think pending  
 21 resolution of the instructions not to  
 22 answer, I don't have any further  
 23 questions at this time. If you give me  
 24 a minute, just to check.  
 25 Thank you very much.

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1 G. Maxwell - Confidential  
 2 MR. PAGLIUCA: I want to make a  
 3 record here before we are done. I do  
 4 get a chance to speak. Are we going off  
 5 the record now?  
 6 MR. BOIES: You want to talk on the  
 7 record?  
 8 MR. PAGLIUCA: Yes, is that okay  
 9 with you?  
 10 MR. BOIES: You want to ask her  
 11 questions?  
 12 MR. PAGLIUCA: No. I want to make  
 13 a record of your closing of the  
 14 deposition.  
 15 MR. BOIES: I don't know how you  
 16 can make a record of my closing the  
 17 deposition, but if you want to take up  
 18 the time and the transcript space to  
 19 talk as opposed to writing a letter or  
 20 filing a motion, go for it.  
 21 MR. PAGLIUCA: To the extent you  
 22 have questions that are within the  
 23 court's order that you haven't asked,  
 24 that I haven't objected to, meaning no  
 25 other questions, this deposition is

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1 G. Maxwell - Confidential  
 2 closed.  
 3 If there are questions that I have  
 4 instructed the witness not to answer and  
 5 it later turns out the judge disagrees  
 6 with my characterization, we will be  
 7 back to revisit it, but we are done as  
 8 far as I'm concerned.  
 9 MR. BOIES: The deposition is not  
 10 closed. There are a number of  
 11 instructions not to answer. I think it  
 12 is a fair point that if the court were  
 13 to conclude that none of the questions  
 14 that have been instructed need to be  
 15 answered, we're not going to be  
 16 continuing the deposition, barring some  
 17 additional information coming to light.  
 18 MR. PAGLIUCA: I think we agree  
 19 then.  
 20 THE VIDEOGRAPHER: The time is 2:51  
 21 p.m., and we are going off the record.  
 22 (Time noted: 2:51 p.m.)  
 23  
 24  
 25

Confidential

<p style="text-align: right;">Page 194</p> <p>1 2 --- 3 INDEX 4 --- 5 6 GHISLAINE MAXWELL PAGE 7 By Mr. Boies 4 8 9 --- 10 EXHIBITS 11 --- 12 EXHIBIT PAGE 13 Exhibit 26 List of names 23 14 Exhibit 27 Article 94 15 Exhibit 28 List of names 135 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 196</p> <p>1 2 --- 3 Questions Marked 4 Page Line Page Line Page Line 5 None 6 --- 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 195</p> <p>1 2 --- 3 DEPOSITION SUPPORT INDEX 4 --- 5 Direction to Witness Not to Answer 6 Page Line Page Line Page Line 7 50 22 50 25 51 5 8 51 9 51 17 51 22 9 52 2 81 17 82 6 10 82 25 83 7 94 21 11 95 6 98 12 118 11 12 142 6 142 13 165 16 13 165 25 169 22 172 13 14 172 22 173 4 173 24 15 174 5 175 9 175 17 16 175 25 176 8 183 14 17 186 23 18 --- 19 Request for Production of Documents 20 Page Line Page Line Page Line 21 None 22 --- 23 Stipulations 24 Page Line Page Line Page Line 25 None</p>	<p style="text-align: right;">Page 197</p> <p>1 2 CERTIFICATE 3 4 5 I HEREBY CERTIFY that GHISLAINE 6 MAXWELL, was duly sworn by me and that the 7 deposition is a true record of the testimony 8 given by the witness. 9 10 11 _____ 12 Leslie Fagin, 13 Registered Professional Reporter 14 Dated: July 22, 2016 15 16 (The foregoing certification of 17 this transcript does not apply to any 18 reproduction of the same by any means, unless 19 under the direct control and/or supervision 20 of the certifying reporter.) 21 22 23 24 25</p>

Confidential

Page 198

1  
2 ACKNOWLEDGMENT OF DEPONENT  
3

4  
5 I, \_\_\_\_\_, do hereby  
6 certify that I have read the foregoing pages,  
7 and that the same is a correct transcription  
8 of the answers given by me to the questions  
9 therein propounded, except for the  
10 corrections or changes in form or substance,  
11 if any, noted in the attached Errata Sheet.  
12  
13  
14

15  
16 GHISLAINE MAXWELL DATE  
17

18  
19  
20 Subscribed and sworn  
21 to before me this  
22 day of \_\_\_\_\_, 2016.  
23 My commission expires:  
24

25 Notary Public

Page 199

1  
2 -----  
3 ERRATA  
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6 PAGE LINE CHANGE  
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[REDACTED]	[REDACTED]	[REDACTED]	<b>5</b> [REDACTED]	[REDACTED]
<b>Z</b> [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

# Exhibit G

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT  
2 IN AND FOR BROWARD COUNTY, FLORIDA  
3 CASE NO. 15-000072

3 BRADLEY J. EDWARDS and PAUL G.  
4 CASSELL,

5 Plaintiffs,

6 -vs-

**CONFIDENTIAL**

7 ALAN M. DERSHOWITZ,

8 Defendant.

9 ----- /

10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11

12 Saturday, January 16, 2016  
13 9:07 a.m. - 2:48 p.m.

14 401 East Las Olas Blvd., Suite 1200  
15 Fort Lauderdale, Florida 33301

16

17

18 Reported By:

19 Deborah A. Harris, Court Reporter  
20 Notary Public, State of Florida  
21 Phone - 305.651.0706

22

23 Job No. J0277789

24

25

1 APPEARANCES:

2 On behalf of the Plaintiffs:  
3 Jack Scarola, Esquire  
4 SEARCY, DENNEY, SCAROLA, BARNHART &  
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9 On behalf of the Deponent:  
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15 (954) 356-0011

16 On behalf of the Defendant:  
17 Mary Borja, Esquire  
18 WILEY REIN, LLP  
19 1776 K Street NW  
20 Washington, DC 20006  
21 (202) 719-7000

22 On behalf of the Defendant:  
23 Richard Simpson, Esquire  
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On behalf of the Defendant:  
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(617) 646-4466

25

1 ALSO PRESENT

2

Edward J. Pozzuoli, Special Master  
Robert Pacheco, Videographer  
Ryan Kick, Videographer  
Bradley J. Edwards  
Paul G. Cassell  
Alan M. Dershowitz  
Brittany N. Henderson, Esq.  
Meridith Schultz, Esquire

7

- - -

8

I N D E X

9

10 WITNESS DIRECT CROSS REDIRECT RECROSS

11 Virginia Roberts Giuffre

By Ms. Borja 5

12 By Mr. Scarola 201

By Ms. Borja 204

13

- - -

14

E X H I B I T S

15 DEFENDANT VR EXHIBITS

FOR ID

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21

REPORTER'S NOTE: Exhibit 5 marked confidential, sealed,  
22 and retained by the Special Master.

23

24

25

1                   Deposition taken before Deborah A. Harris,  
2 Florida Professional Court Reporter and Notary Public in  
3 and for the State of Florida at Large, in the above  
4 cause.

5   - - -

6                   THE VIDEOGRAPHER: We are now on video  
7 record. This is disk number one in the videotaped  
8 deposition of Virginia Roberts in the matter of  
9 Bradley J. Edwards and Paul G. Cassell, Plaintiff  
10 versus Alan M. Dershowitz, Defendant.

11                   The deposition is being held at the Law  
12 Office of Boies, Schiller & Flexner located at 401  
13 East Las Olas Boulevard, Suite 1200. Fort  
14 Lauderdale, Florida 33301. Today's date is  
15 January 16th, 2016. The time is 9:07 a.m.

16                   My name is Robert Pacheco, I am the  
17 videographer. The court reporter is Deborah  
18 Harris, both from Esquire Deposition Solutions.  
19 Would counsel please introduce yourselves and your  
20 affiliation and the witness will be sworn in.

21                   MS. MCCAWLEY: My name is Sigrid McCawley.  
22 I'm with the Law Firm of Boies, Schiller &  
23 Flexner. I'm here with my colleague, Meridith  
24 Schultz and we represent non-party Virginia  
25 Roberts Giuffre.



1 MR. SCAROLA: Jack Scarola, counsel on  
2 behalf of Bradley Edwards and Paul Cassell. Mr.  
3 Edwards and Mr. Cassell are also present.

4 MS. HENDERSON: Brittany Henderson also on  
5 behalf of the Plaintiff.

6 MS. BORJA: Mary Borja for Defendant, Alan  
7 Dershowitz.

8 MR. SCOTT: Thomas Scott for the Defendant.

9 MR. SIMPSON: Richard Simpson on behalf of  
10 Professor Dershowitz.

11 MR. SWEDER: Ken Sweder of Sweder and Ross  
12 on behalf of Professor Dershowitz.

13 SPECIAL MASTER: Ed Pozzuoli, Special  
14 Master.

15 - - -

16 Thereupon,

17 VIRGINIA ROBERTS GIUFFRE,  
18 having been first duly sworn or affirmed, was examined  
19 and testified as follows:

20 THE WITNESS: Yes, I do.

21 DIRECT EXAMINATION

22 BY MS. BORJA:

23 Q. We have noticed this examination for you as  
24 Virginia Roberts. I understand you have a different  
25 married last name?

1 A. Yes.

2 Q. Could you pronounce that for me?

3 A. Giuffre.

4 Q. Giuffre. If I from time to time call you  
5 Ms. Roberts, would that be okay with you today?

6 A. Absolutely.

7 (Thereupon, Defendant's VR Exhibit No. 1,  
8 was Marked for Identification.)

9 BY MS. BORJA:

10 Q. I'm going to hand you a document that's  
11 been marked as VR Exhibit Number 1, which is a notice of  
12 taking video duces tecum. Ms. Roberts, are you appearing  
13 here today pursuant to this notice of video deposition  
14 duces tecum?

15 A. Yes.

16 Q. And you've seen this document before today?

17 A. No.

18 Q. Did you bring any documents with you today  
19 pursuant to the duces tecum?

20 A. No.

21 Q. Were you asked to bring any documents with  
22 you today?

23 A. No.

24 Q. You understand that you're under oath today  
25 and that your testimony is being taken down by the court

1 reporter, correct?

2 A. Yes.

3 Q. And today's testimony is the same as if you  
4 were testifying before a judge and a jury. Do you  
5 understand that?

6 A. Yes.

7 Q. It's important that you allow me to finish  
8 my question and I'll allow you to finish your answer  
9 because the court reporter is very good, but she can only  
10 type one of us talking at a time. Is that okay?

11 A. Yes.

12 Q. It's also important that all of your  
13 answers be verbal since nodding your head or shaking your  
14 head if you mean yes or no, you should give it a verbal  
15 response. Is that agreeable?

16 A. Yes.

17 Q. What is your current home address?

18 MS. MCCAWLEY: We're going to object on the  
19 record. You're welcome to notice anything to my  
20 law office for Virginia. She's had some safety  
21 issues with respect to her location so we're not  
22 going to be putting that on the record.

23 MS. BORJA: That's fine. You're going to  
24 accept service for her for all purposes in this  
25 action?

1 MS. MCCAWLEY: Yes.

2 MS. BORJA: That's fine. Thank you.

3 MS. MCCAWLEY: Yes. If you need to serve  
4 her with anything.

5 BY MS. BORJA:

6 Q. Ms. Roberts, are you taking medication that  
7 would effect in any way your ability to testify?

8 A. No.

9 Q. Were you involved in collecting documents  
10 for production in this case?

11 A. I don't understand.

12 Q. I'll get back to that in a little bit. Are  
13 you aware of the action that your attorneys, Brad Edwards  
14 and Paul Cassell, filed against the government?

15 A. Yes.

16 Q. If I call that the Federal action or the  
17 CVRA action, will you understand the action that I'm  
18 referring to?

19 A. Yes.

20 Q. And you sought to join that action,  
21 correct?

22 A. Yes.

23 Q. And you understand that you were Jane Doe  
24 #3 named in the motion for joinder, right?

25 A. Yes.

1 Q. I'm going to show you, I'm not going to  
2 mark it as an exhibit, a copy of Jane Doe #3 and Jane Doe  
3 #4 corrected motion pursuant to Rule 21 for joinder and  
4 action. Do you have that in front of you right now?

5 A. Yes.

6 Q. And this was entered as Document 280 in the  
7 docket for purposes of identification in our record here  
8 today. Did you review this document before it was filed?

9 A. Not this specific document, no.

10 Q. Were you aware that this joinder motion was  
11 being filed in the CVRA action?

12 A. I knew there was an action for the CVRA for  
13 me to be joined, yes.

14 Q. And you're aware, are you not, that there  
15 are allegations that you were sexually trafficked being  
16 made in that action, correct?

17 A. I'm aware that there are allegations that I  
18 was trafficked.

19 Q. If you turn to page 4 of this document the  
20 numbers are on the bottom of the page. In that first  
21 full paragraph in the third line down it says, Epstein  
22 required Jane Doe #3 to have sexual relations with  
23 Dershowitz on numerous occasions when she was a minor?

24 MS. MCCAWLEY: Feel free to look at the  
25 entire page.

1 MR. SCAROLA: It is a minor discrepancy,  
2 but I think you read it as when she was a minor  
3 and it's while she was a minor.

4 BY MS. BORJA:

5 Q. While she was a minor. Do you see where  
6 I'm reading starting in the third line?

7 A. Yes.

8 Q. Is that allegation true?

9 A. Yes.

10 Q. If you go to page 6 of the document, do you  
11 see the paragraph that's starts, Epstein also trafficked?

12 A. Yes.

13 Q. Is says Epstein also trafficked Jane Doe #3  
14 for sexual purposes to many other powerful men including  
15 numerous prominent American politicians, powerful  
16 business executives, foreign presidents, a well-known  
17 prime minister and other world leaders. Do you see that?

18 A. Yes.

19 Q. Is that allegation true?

20 A. Yes.

21 Q. The reference there to foreign presidents,  
22 do you see that?

23 A. Yes.

24 Q. You were sexually trafficked to foreign  
25 presidents?

1 A. No.

2 Q. So that's not true, you were not sexually  
3 trafficked to foreign presidents?

4 A. I don't know what foreign president you're  
5 talking about.

6 Q. Have you ever been sexually trafficked to  
7 any foreign president?

8 MS. MCCAWLEY: I'm going to allow you to  
9 ask that question, but with respect to specific  
10 identification of an individual we're not going to  
11 do that. At this point she has.

12 MS. BORJA: Counsel, your objection has  
13 been made. No speaking objections, please. Let's  
14 move on.

15 MS. MCCAWLEY: I can make my record, and my  
16 record is she's not going to be speaking with  
17 respect to individuals' names that are named in  
18 generalities in this document.

19 SPECIAL MASTER: Objection overruled. You  
20 can answer.

21 A. I understand well-known prime ministers and  
22 other world leaders; as far as foreign presidents, I'm  
23 not too sure, I don't know.

24 Q. Have you ever met any foreign presidents?

25 A. Foreign presidents as in overseas?

1 Q. Sure, okay, overseas.

2 A. No.

3 Q. Have you ever met any foreign presidents  
4 from countries not overseas such as Canada or Mexico?

5 A. No.

6 Q. So you were not sexually trafficked to any  
7 foreign presidents; is that correct?

8 A. As far as I know right now, yes.

9 Q. It's correct that you were not sexually  
10 trafficked to them, right?

11 A. You've asked me this three times and I'm  
12 telling you.

13 Q. Okay. A well-known prime minister. Were  
14 you sexually trafficked to a well-known prime minister?

15 A. Yes.

16 Q. Who was that?

17 MS. MCCAWLEY: I'm going to object to this  
18 line of questioning. This has to do with safety  
19 concerns for her.

20 MS. BORJA: Counsel, this is under seal.  
21 You can answer.

22 MS. MCCAWLEY: No, she's not going to  
23 answer.

24 SPECIAL MASTER: Hang on one second.

25 MS. MCCAWLEY: Let me make my objection.



1           SPECIAL MASTER: Make your objection.

2           MS. MCCAWLEY: Regardless of it being under  
3 seal, we've seen that in this case the client that  
4 you represent has violated confidentiality orders  
5 regularly so we have no sense of security with a  
6 sense that this is a confidential record at this  
7 point. We are doing that under the Court's order.

8           With respect to naming individuals who can  
9 harm a victim of sexual trafficking, she's a  
10 non-party in this action, not a plaintiff. She is  
11 not going to be revealing any names today of an  
12 individual who is going to harm her physically,  
13 period. If we have to go to Judge Lynch on that  
14 we will, I'm happy to do that, but she's not going  
15 to be naming individuals where there's a threat to  
16 her safety.

17           SPECIAL MASTER: Response.

18           MS. BORJA: It is under seal. I'm shocked  
19 that counsel would suggest that a prime minister  
20 is threatening the physical safety of this  
21 witness. There's no foundation for that. The  
22 suggestion that a foreign minister is going to  
23 physically harm has no evidence in this case, and  
24 it's being to be under seal.

25           Let's get the evidence out while the

1 witness is here. As you pointed out, she's a  
2 non-party. Let's make our record and move on.

3 MS. MCCAWLEY: You may be shocked by that  
4 but --

5 SPECIAL MASTER: Hang on one second. The  
6 reason why I'm here is so we don't have the back  
7 and forth.

8 MS. MCCAWLEY: Sure.

9 SPECIAL MASTER: I'm going to rule on the  
10 objection. Your objection at this point is  
11 overruled. You can answer. And I want to  
12 admonish everybody here that this is confidential  
13 and the protection of this witness is of paramount  
14 importance under the Confidentiality Order. So  
15 Ms. Roberts, you can answer the question that's  
16 been asked.

17 MS. MCCAWLEY: At this point we're going to  
18 need to take a break because I'm not going to  
19 allow her to answer a question that's going to  
20 threaten her physical safety. So we can take a  
21 break on that.

22 THE WITNESS: If I can just say, I  
23 personally know that this is not a good person to  
24 talk about and I'm not going to, point blank, I'm  
25 not going to say his name.

1                   SPECIAL MASTER: Okay. I can't twist her  
2                   arm and force her so we'll deal with it.

3 BY MS. BORJA:

4                   Q. Okay. Other world leaders, what other  
5 world leaders were you sexually trafficked to?

6                   MS. MCCAWLEY: We have the same objection.

7                   SPECIAL MASTER: And I would have the same  
8 ruling based upon the arguments.

9                   MS. MCCAWLEY: Let me just make my record.  
10 To the extent that there's a name of an individual  
11 that you can reveal that you do not feel would  
12 harm your physical safety, you're welcome to  
13 reveal them. Anybody else, you don't have to  
14 reveal at this time and we'll take that to Judge  
15 Lynch.

16                  A. Okay. Prince Andrew for one.

17                  Q. Other than Prince Andrew?

18                  A. There is another individual that I honestly  
19 do not know his name.

20                  Q. What country is he from?

21                  A. I'm not too sure, he spoke in a foreign --  
22 he did speak foreign tongue, he spoke English as well,  
23 but I'm not too sure where he was from.

24                  Q. How do you know he is world leader?

25                  A. I was introduced to him as a prince.

1 Q. Okay. Did he have security with him?

2 A. I'm sure he did somewhere around, but not  
3 when I was with him.

4 Q. Did you see security?

5 A. No.

6 Q. Did you -- where were you when you met him?

7 A. On this occasion the South of France.

8 Q. Are there witnesses to you being sexually  
9 trafficked to this prince?

10 A. Yes.

11 Q. Name them.

12 A. Jeffrey Epstein, Ghislaine Maxwell.

13 Q. Anyone else?

14 A. There was a whole bunch of people in the  
15 room so of course.

16 Q. Was this an orgy?

17 A. No.

18 Q. Who else was in the room?

19 A. I can't name them all, there was a lot.

20 Q. Name as many as you can name?

21 A. I don't know their names. I can't name  
22 their names.

23 Q. They were present during sexual activity?

24 A. They were present before the sexual  
25 activity and then I went to have sexual activity with him

1 alone.

2 Q. So he's the only witness to your sexual  
3 activity, the prince?

4 A. On the instruction of Epstein and  
5 Ghislaine, yes.

6 Q. Where in the South of France were you?

7 A. I don't know.

8 Q. Were you on a boat, were you in a house?

9 A. We were at a like a cabana, not cabana,  
10 like a resort, but it was a big party.

11 Q. Who was throwing the party?

12 A. I don't know. I was just brought there.

13 Q. You also refer to powerful business  
14 executives. What powerful business executives were you  
15 sexually trafficked to?

16 MS. MCCAWLEY: Again, to the extent you can  
17 reveal somebody without a safety concern you're  
18 welcome to do that.

19 SPECIAL MASTER: Well, again --

20 MS. MCCAWLEY: Right. I understand.

21 SPECIAL MASTER: Same objection, same  
22 ruling.

23 A. George Mitchell.

24 Q. When were you sexually trafficked to George  
25 Mitchell?

1           A.     I am unable to give you times since we are  
2 going back a very long time ago.

3           Q.     Tell me the best that you can remember?

4           A.     Roughly when I was 17.

5           Q.     Where were you?

6           A.     New Mexico and New York.

7           Q.     Are there witnesses to this?

8           A.     Not to the actual event itself.

9           Q.     What other powerful business executives  
10 were you sexually trafficked to?

11          A.     Bill Richardson.

12          Q.     Are there witnesses?

13          A.     Besides Epstein instructing me to do so,  
14 no.

15          Q.     What other powerful business executives  
16 that you were sexually trafficked to?

17          A.     Yes, I know what you're saying.

18                 MS. MCCAWLEY: Take your time. Take a deep  
19 breath.

20          A.     Jean Luc Brunel.

21          Q.     Who else?

22                 MS. MCCAWLEY: To the extent you recall.

23          A.     I'm just trying to think. This is all very  
24 confronting for me. So at the same token I'm just trying  
25 to recollect everybody. The Dubins, Glen Dubin.

1 Q. You said the Dubins, were you sexually  
2 trafficked to more than one Dubin?

3 A. No.

4 Q. Just to Glen?

5 A. Just to Glen.

6 Q. Is he the powerful business executive who's  
7 pregnant wife was asleep in the next room.

8 A. Yes.

9 Q. What other powerful business executives  
10 were you sexually trafficked to?

11 A. None that I can remember off the top of my  
12 head.

13 Q. Was Les Wexner one of the powerful business  
14 executives that you were trafficked to?

15 A. Yes.

16 Q. So you can remember others. Who else is  
17 there?

18 MS. MCCAWLEY: I'm going to object to that.  
19 That's inappropriate. She gave you everyone she  
20 could remember at the time when you mentioned a  
21 name.

22 SPECIAL MASTER: Okay. Okay. Please move  
23 on without --

24 MS. BORJA: There's a question pending.

25 A. I said yes.

1 Q. What other powerful business executives?

2 A. Wasn't that just objected?

3 MS. MCCAWLEY: You can answer.

4 SPECIAL MASTER: You can answer.

5 A. I can't remember off the top of my head,  
6 I'm sorry.

7 Q. You also referred to prominent American  
8 politicians. What prominent American politicians other  
9 than the ones we've already named were you sexually  
10 trafficked to?

11 A. The ones I just told you about, Bill  
12 Richardson and [REDACTED].

13 Q. How many times were you trafficked to Bill  
14 Richardson?

15 A. I don't know, over two times.

16 Q. How old were you?

17 A. Approximately 17, 18.

18 Q. Are you sure you were underage during one  
19 of those incidents?

20 A. I can't be 100 percent sure of anything.  
21 It's not like I recorded the dates. I'm just giving you  
22 an approximation.

23 Q. How many times were you sexually trafficked  
24 to [REDACTED]?

25 A. Twice that I can recall.



1 Q. Were you underage during either of those?

2 A. I believe so.

3 Q. Both of them?

4 A. I can't be 100 percent sure.

5 Q. When you were sexually trafficked to the  
6 prince were you underage?

7 A. Not by England's standards.

8 Q. You weren't in England, were you, you were  
9 in the South of France?

10 MS. MCCAWLEY: Which prince? You need to  
11 clarify.

12 A. Foreign prince, sorry. I believe I would  
13 have been 17. I don't know what their age --

14 MS. MCCAWLEY: You don't have to know. You  
15 don't have to know anything legal. Just answer  
16 the question the best you can.

17 BY MS. BORJA:

18 Q. So how old were you when you were sexually  
19 trafficked to Mr. Dubin?

20 A. I don't know.

21 Q. What is your best guess?

22 A. I'm not going to speculate.

23 Q. How many times did you have sex with Mr.  
24 Dubin?

25 A. Once.

1 Q. How many times did you have sex with Les  
2 Wexner?

3 A. Multiple.

4 Q. What's the approximate range of number,  
5 more than three?

6 A. More than three.

7 Q. More than five?

8 A. Possibly.

9 Q. More than ten?

10 A. No.

11 Q. Did Mr. Wexner ask you to wear any  
12 particular clothing during your sexual trafficking?

13 MS. MCCAWLEY: Again, I'm going to object  
14 to this line of questioning. To the extent that  
15 you revealed something to me in work product  
16 circumstance or attorney-client privilege, I don't  
17 want you revealing that.

18 This case is about the defamation between  
19 Paul Cassell and Brad Edwards and Mr. Dershowitz.  
20 It's not about the individuals other than Mr.  
21 Dershowitz who is the individual here who the  
22 judge said we're here to talk about the issues in  
23 this case, not the litany of other individuals.

24 MS. BORJA: Counsel, we have limited time.

25 SPECIAL MASTER: Hang on one second. I'm

1 going to deny the objection. You can answer the  
2 question. I'm going to give some latitude on  
3 this, but counsel, please understand it's some  
4 latitude. So you can answer the question.

5 MS. BORJA: And Special Magistrate, I would  
6 also ask for an instruction, we have limited time  
7 here and speaking objections are inappropriate and  
8 unnecessary for your ruling.

9 MS. MCCAWLEY: I'm allowed to make my  
10 record.

11 SPECIAL MASTER: Counsel, she needs to make  
12 the record, however, the four hours in my mind is  
13 not a hard and fast four hours based upon how we  
14 proceed in this deposition. So I'll take that  
15 into consideration as we approach the four hours.

16 A. Yes, I wore lingerie for him.

17 Q. At his request?

18 A. It wasn't his request, it was Ghislaine who  
19 set it up for me.

20 Q. And did she specify baby doll lingerie to  
21 be worn?

22 A. All different types of lingerie.

23 Q. Was it specifically Victoria Secret  
24 lingerie?

25 A. I didn't write the brand.

1 Q. Have you alleged that you were required to  
2 wear Victoria Secret lingerie for Les Wexner?

3 A. No.

4 MS. MCCAWLEY: Alleged in what context?

5 BY MS. BORJA:

6 Q. She's already answered. Now, other than  
7 the people you've already named for me today, were you  
8 sexually trafficked to anyone else during your period  
9 between 1999 and 2002?

10 A. Yes.

11 Q. Who else?

12 MS. MCCAWLEY: To the extent you can  
13 recall.

14 SPECIAL MASTER: Counsel, let her think it  
15 through.

16 A. Alan Dershowitz, Jean Brunel, the obvious  
17 people that I've already stated. [REDACTED],  
18 Jeffrey Epstein obviously, Ghislaine Maxwell, you know,  
19 there's people that I just -- I honestly can't think of  
20 everybody right now. I do feel like I am under a lot of  
21 pressure to answer the questions and I'm doing the best  
22 that I can honestly.

23 Q. Were you sexually trafficked to Marvin  
24 Minsky?

25 A. Yes.

1 Q. Were you sexually trafficked to a man last  
2 name [REDACTED]?

3 A. Who?

4 Q. [REDACTED], if the name doesn't ring a bell,  
5 just tell me?

6 A. No.

7 Q. How many times were sexually trafficked to  
8 Marvin Minsky?

9 A. Once.

10 Q. How old were you?

11 A. I don't know.

12 Q. You're sure it was one time, correct?

13 A. I'm not sure of anything. There was a lot  
14 of people that Jeffrey sent me to and it was a long time  
15 ago. I can't be a thousand percent correct on that.

16 Q. Who is Marvin Minsky?

17 A. He is an older gentleman.

18 Q. Do you know what's does for a living?

19 A. I think he's a scientist, but I don't want  
20 to 100 percent say.

21 Q. Who is [REDACTED]?

22 A. I think he's a [REDACTED] r.

23 Q. Do you know where?

24 A. Possibly [REDACTED], I think, or maybe [REDACTED].

25 I'm not too sure. I'm just speculating.

1 Q. Where did you meet [REDACTED]?

2 A. [REDACTED], at the islands.

3 Q. And when you say the islands, do you mean  
4 Jeffrey Epstein's estate?

5 A. Yes.

6 Q. And where did you meet Marvin Minsky?

7 A. Marvin Minsky was at the islands as well.

8 Q. Did you ever meet him anywhere else?

9 A. Yes.

10 Q. Did you have sex with him in other  
11 locations?

12 A. No.

13 Q. Did you ever fly in a plane with him?

14 A. No.

15 Q. Did you ever have sex is Larry Summers?

16 A. No, not that I know of. The name does not  
17 ring a bell. You have to understand that there were a  
18 lot of gentlemen that I was lent out to by Jeffrey  
19 Epstein. So it is very hard for me to remember all of  
20 their names and who they were and what they did.

21 (Thereupon, Defendant's VR Exhibit No. 2,  
22 was Marked for Identification.)

23 BY MS. BORJA:

24 Q. Ms. Roberts, when you refer to [REDACTED]

25 [REDACTED], did you mean [REDACTED]?

1 A. No.

2 Q. Have you ever met a [REDACTED] ?

3 A. Possibly.

4 Q. Do you know one way or the other?

5 A. Do I know?

6 Q. You said possibly?

7 A. I was introduced lots of political  
8 scientific, academic, so there is a possibility I could  
9 have met him.

10 Q. Did you ever have sex with [REDACTED] ?

11 A. No.

12 Q. Were you ever sexually trafficked to Nathan  
13 Nerveit?

14 A. No, not that I know of.

15 Q. I'm handing you a document that's been  
16 marked as VR Exhibit 2, which is Plaintiff, Virginia L.  
17 Giuffre's, I apologize, disclosure pursuant to Federal  
18 Rule of Civil Procedure 26.

19 This is a document that was entered in your  
20 lawsuit against Ghislaine Maxwell in the Southern  
21 District of New York. Have you ever seen this document  
22 before?

23 A. No.

24 Q. If you take a look, there's a list of  
25 witnesses starting at page 1 and continues on?

1 A. Yes.

2 Q. I'm wondering whether this list might help  
3 you. Can you look at the names on this list and tell me  
4 who from these names you were sexually trafficked to?

5 A. Number 7, Gwendolyn Beck. I wasn't  
6 trafficked to her. She was just a part of some of the  
7 trafficking.

8 Q. Hold on. What part did she have in the  
9 trafficking?

10 A. She was involved in some of the orgies.

11 Q. So she was a sexual participant in the  
12 orgies?

13 A. Yes.

14 Q. That you were a participant in as well?

15 A. Yes.

16 Q. Were these orgies that Ms. Beck was  
17 involved in with any of the individuals that you have  
18 named so far today?

19 A. Not that I can remember right now.

20 Q. Do you know what gentlemen were involved in  
21 the orgies with you and Ms. Beck?

22 A. As far as I can recall Jeffrey Epstein.

23 Q. Okay.

24 A. Number 9, [REDACTED], Sophie Biddle does  
25 ring a bell, but I don't want to 100 percent say that.



1 Q. Ring a bell in terms of what?

2 A. The name rings a bell. I mean, you have to  
3 understand there was a lot, a lot, a lot of girls around  
4 to remember all of their names.

5 Q. My question is, was Sophie Biddle a  
6 participant in sexual activities with you?

7 A. I don't know and I'm not going to  
8 speculate.

9 Q. I'm not asking you to speculate. I'm  
10 asking you under oath today was she a participant, as far  
11 as you can recall today, in sexual activities --

12 MS. MCCAWLEY: Objection, asked and  
13 answered. Sorry, I didn't mean to interrupt.

14 BY MS. BORJA:

15 Q. -- with you?

16 A. I'm telling you under oath that I'm not  
17 sure about Sophie Biddle being in sexual orgies with me  
18 but the name does ring a bell.

19 Q. And [REDACTED]

20 A. Yes, she was involved, but I'm not going to  
21 speak about her. She has the right to her own privacy.  
22 She's been hurt, she's a victim, so I'm not going there.

23 Q. Did she participate in any of the sexual  
24 activities with others that you've named today?

25 A. Yes.

1 Q. With whom?

2 A. I'm not answering that.

3 MS. MCCAWLEY: We're going to object. To  
4 the extent that you're concerned about the safety  
5 of one of these individuals, we're not going to  
6 testify. We can go to the judge and we can come  
7 back if he says you have to testimony regarding  
8 that but --

9 MS. BORJA: We already have the names of  
10 the gentlemen.

11 SPECIAL MASTER: Hang on one second. For  
12 purposes of the record, have you made your record?

13 MS. MCCAWLEY: Well, let's make a record.  
14 So [REDACTED] was underage at the time this  
15 occurred so she, herself, is a victim. So to the  
16 extent that, you know, if you want to bring her  
17 counsel in and have them present during something  
18 like this, that's fine, but this witness who is a  
19 non-party to this litigation who's a victim  
20 herself doesn't have to speak about other  
21 under-aged victims.

22 SPECIAL MASTER: Counsel?

23 MS. BORJA: I'm entitled to know the names  
24 of witnesses who can either verify or discredit  
25 the allegations.

1 MS. MCCAWLEY: She's given you the name.

2 SPECIAL MASTER: Counsel, let her make her  
3 record.

4 MS. BORJA: As to specific individuals, and  
5 I do not want to bring up her name with  
6 individuals with whom she's not alleged to have  
7 had sexual activity, that would be unfair to this  
8 witness; but what would be fair to my client who  
9 is being sued in this case is to be able to check  
10 the allegations with a neutral third party, and if  
11 this is a witness --

12 MS. MCCAWLEY: Why don't you ask her if  
13 that's somebody who was involved with your client,  
14 which is what we're here on today, Alan  
15 Dershowitz, not all of these other individuals.

16 SPECIAL MASTER: Okay. All right. Have  
17 you made your record?

18 MS. BORJA: Yes.

19 SPECIAL MASTER: I'm going to overrule the  
20 objection. I understand that you're going to  
21 instruct the witness not to answer, right?

22 MS. MCCAWLEY: Yes.

23 SPECIAL MASTER: So that will have to be  
24 dealt with in front of Judge Lynch for a  
25 subsequent time because I do think that it's

1 incumbent upon, especially on this question, it's  
2 incumbent upon you to lay the predicate as to why  
3 you're instructing the witness not to answer.

4 MS. MCCAWLEY: And I believe I have.

5 SPECIAL MASTER: I understand. We're not  
6 here to do that. So I'm going to, for purposes of  
7 the record, I'm going to overrule your objection.  
8 And now make your instruction so we have a clean  
9 record to deal with.

10 MS. MCCAWLEY: Sure. With respect to [REDACTED]  
11 [REDACTED] because she was an underaged victim at the  
12 time, I'm instructing you not to answer questions  
13 with respect to her other than identifying her as  
14 being one of the victims involved.

15 BY MS. BORJA:

16 Q. Are you going to follow your counsel's  
17 instructions?

18 A. Absolutely.

19 Q. And you understand that we're going to  
20 reserve the right to bring you back for another  
21 deposition in the event that the judge overrules your  
22 counsel's objections. Do you still want to keep abiding  
23 by those?

24 A. Go for it.

25 Q. I'm sorry?

1 SPECIAL MASTER: Yes. Yes.

2 A. No problem.

3 Q. We were looking at the list of names and  
4 you were going through to see if they refresh your  
5 recollection as to the names of individuals to whom you  
6 were sexually trafficked?

7 A. On page 3, number 11, [REDACTED].

8 Q. Who is [REDACTED]?

9 A. I think she also goes underneath the name  
10 Kelly Spamm, if it's the same woman that I'm thinking of  
11 and she was one of Jeffrey's, I would like to say,  
12 co-conspirators. She had sex with underaged girls and  
13 myself.

14 Number 12, Jean Luc Brunel. He was not  
15 only a witness, but also another co-conspirator. Again,  
16 number 13, [REDACTED] sounds familiar, but I'm not going  
17 to attempt to put her out of place and I'm not too sure.

18 Q. Do you know who the names of the others  
19 are, Valdson Cotrin or Chauntae Davies, do you know who  
20 they are?

21 A. Chauntae Davies I think I have heard of as  
22 another victim, but I don't recall meeting her.

23 Q. Do you know who Valdson Cotrin is?

24 A. No.

25 Q. Okay.

1           A.       Number 19, Alan Dershowitz; number 22 Eva  
2 Anderson Dubin; number 23, Glen Dubin.

3           Q.       Before you move on, were you sexually  
4 trafficked to Eva Anderson Dubin?

5           MS. MCCAWLEY: This has been asked and  
6 answered.

7           SPECIAL MASTER: No, it has not.  
8 Overruled.

9           A.       No, I was not trafficked to Eva. Number  
10 24, number 25, I believe are [REDACTED].

11          Q.       Let me ask you this, were you sexually  
12 trafficked to [REDACTED]?

13          A.       No.

14          MS. MCCAWLEY: With a question pending, I  
15 think she's lost the question, Counsel. Ask the  
16 question.

17          MS. BORJA: Okay, counsel, I'll ask the  
18 question.

19          MS. MCCAWLEY: Thank you.

20 BY MS. BORJA:

21          Q.       The question is, when you look at this list  
22 of names does it refresh your recollection as to who you  
23 were sexually trafficked to?

24          A.       Some of the people that I mentioned, yes.

25          Q.       Okay. So, let's continue reviewing the

1 list. I'm looking for the names of the people that you  
2 allege you were sexually trafficked to?

3 A. Okay. Number 26, Prince Andrew; number 27,  
4 Jeffrey Epstein; number 43, Shelly Harrison, she was an  
5 older woman who participated.

6 Q. Participated in what?

7 A. In sexual acts.

8 Q. With whom?

9 A. With Jeffrey Epstein.

10 Q. How do you know that?

11 A. I was there with her.

12 Q. Okay, who else was there?

13 A. Ghislaine Maxwell, Emmy Tayler.

14 Q. Anyone else?

15 A. No. Did I say Sheridan, number 38?

16 Q. No.

17 A. Okay, Sheridan is another one.

18 Q. Is another what?

19 A. Another older woman that was a part of the  
20 sexual endeavors.

21 Q. With whom?

22 A. Ghislaine, Jeffrey and me.

23 Q. Anyone else?

24 A. Number 46.

25 Q. I'm sorry, I'm still talking about

1 Sheridan. When you said involved, you said involved with  
2 sexual activity with Ghislaine, Jeffrey and yourself.  
3 Was there anybody else involved?

4 A. Not that I can remember.

5 Q. Was this a single incident?

6 A. No.

7 Q. Okay.

8 A. Number 46, Sarah Kensington, formerly known  
9 as Sarah Kellen, she was involved with, very heavily  
10 involved with lots of incidents of sex.

11 Q. With yourself?

12 A. With myself.

13 Q. And who else?

14 MS. MCCAWLEY: To the extent you can  
15 answer. If it's multiple incidents you can take  
16 them one at a time.

17 A. It was multiple incidents so it's going to  
18 be nearly impossible for me to remember every one. But  
19 obviously Jeffrey Epstein, Ghislaine Maxwell, Les Wexner,  
20 Brunel, Jean Luc Brunel. I'm sure there's more, but I  
21 just can't remember off the top of my head.

22 Q. How do know that she had sex with Les  
23 Wexner?

24 A. I was there.

25 Q. How do you know she had sex with Jean Luc



1 Brunel?

2 A. I again was there.

3 Q. How many times did you and Les Wexner and  
4 Sarah Kellen have sex together?

5 A. Once that I can remember.

6 Q. Where were you?

7 A. New Mexico.

8 Q. Are there other witnesses?

9 A. Number 48, [REDACTED], I can't pronounce her last  
10 name.

11 Q. [REDACTED]?

12 A. [REDACTED], yes.

13 Q. Anyone else?

14 A. Number 50, [REDACTED]

15 MS. MCCAWLEY: I'm sorry, I think she's  
16 moving on with the list. Are you still talking  
17 about the incident?

18 BY MS. BORJA:

19 Q. I understand [REDACTED] was a witness  
20 to your sexual activities with Les Wexner in Mexico, is  
21 that not what you meant?

22 A. Yes.

23 Q. She was a witness?

24 A. Yes.

25 Q. Was [REDACTED] a witness?

1 A. No, I'm sorry. I was moving on with the  
2 list.

3 Q. What is the sexual incident involving

4

[REDACTED]

5 A. Palm Beach and the Caribbean with Jeffrey,  
6 myself, possibly Sarah Kellen if I remember correctly,  
7 there was another girl, I'm pretty sure it was Sarah.

8 Q. Were you sexually trafficked to anybody  
9 else on the list?

10 A. I'll continue with the list here. Nadia  
11 Marcinkova I was not sent to her, but she was a part of  
12 it with Jeff Epstein, Marvin Minsky, Tom Pritzker.

13 Q. Who is Tom Pritzker?

14 A. He, I don't know exactly what he does, but  
15 I think he's some kind of academic.

16 Q. Did you have sex with him?

17 A. Yes.

18 Q. How many times?

19 A. Off the top of my head, just once.

20 Q. Where were you?

21 A. I believe Tom was at Mexico.

22 Q. Approximately how old were you?

23 A. Again, I don't know.

24 Q. Are there any other witnesses?

25 A. Not that I can remember. I mean, besides

1 Jeffrey asking me to give him a massage which involved  
2 sexual acts, I don't remember. Joanna Sjoberg was  
3 another victim of Jeffrey Epstein who witnessed sexual  
4 acts.

5 Q. Witnessed sexual acts between you and  
6 somebody else?

7 A. She is another victim that I would like to  
8 say that I wouldn't like to mention the stuff that  
9 happened to her. She's very sensitive about this stuff.

10 Q. That's fine, but I'm wondering if she's a  
11 witness to sexual acts that you allege were between you  
12 and somebody else?

13 A. Other than Epstein, no. I mean, she did  
14 see the meeting with Prince Andrew, but she did not  
15 witness the act with him.

16 Q. Okay.

17 A. Kelly Spamm is, I believe that be [REDACTED]  
18 [REDACTED] which is number 81, and I've already explained  
19 that one. Number 85, Emmy Taylor, she witnessed many  
20 acts of sexual abuse by Ghislaine Maxwell, Jeffrey  
21 Epstein.

22 Number 92, Larry Visosky is the pilot. I  
23 don't believe he witnessed anything, but he was flying  
24 during some of the times that sexual abuse encountered.

25 Q. Do you know why Les Wexner is not on this

1 list?

2 A. I haven't seen this list before, so, no.

3 MS. MCCAWLEY: This is a good time to take  
4 a break.

5 MS. BORJA: The time is now 9:45.

6 THE VIDEOGRAPHER: Going off video record  
7 9:49 a.m.

8 (A recess was taken.)

9 THE VIDEOGRAPHER: We are now back on video  
10 record 10:01 a.m.

11 MS. MCCAWLEY: Did you mark this?

12 MR. SCAROLA: Yes.

13 MS. MCCAWLEY: That's 2.

14 BY MS. BORJA:

15 Q. Ms. Roberts, did you have an opportunity to  
16 talk to anybody other than Ms. McCawley during the break?

17 A. Yes, I spoke with my good friends over  
18 there.

19 Q. Who are?

20 A. Brittany Henderson and --

21 MS. MCCAWLEY: Meridith.

22 BY MS. BORJA:

23 Q. Anyone else?

24 A. Brad Edwards. I'm sorry, I forget he came  
25 in.

1 Q. Now, do you have knowledge of Professor  
2 Dershowitz having sex with any minor girls other than,  
3 you claim, yourself?

4 A. Yes, I don't know their names.

5 Q. How do you know that?

6 A. I witnessed it.

7 Q. Where were you?

8 A. On an airplane.

9 Q. How many girls?

10 A. One.

11 Q. Describe her?

12 A. Blond, young.

13 Q. Anything else?

14 A. No.

15 Q. Where were you going on this plane?

16 A. You know, it's hard for me to remember the  
17 exact destination. I was flying around a lot from the  
18 times I was with Jeffrey, but I believe it was to  
19 Massachusetts, if my memory is correct.

20 Q. Why were you flying to Massachusetts?

21 A. Again, I don't want to -- I don't know. I  
22 just flew wherever Jeffrey wanted fly to.

23 Q. Did you stay in a hotel in Massachusetts?

24 A. No, we flew in and flew out the same day.

25 Q. Who else was on the plane?

1 A. Epstein.

2 Q. Where were you coming from?

3 A. I believe it was New York, but again, I  
4 don't want to 100 percent say, like I said we were  
5 constantly flying.

6 Q. Was it winter time, was it summer time?  
7 What do you recall about when it was?

8 A. It wasn't snowing so I'm not too sure.  
9 This is going back a long time ago. I don't know the  
10 date.

11 Q. What's your best recollection of how you  
12 were dressed?

13 A. I don't know what I was wearing.

14 Q. Did you have a sweater?

15 A. I don't know what I was wearing.

16 Q. Were you over 18?

17 A. I don't know, I'm sorry.

18 Q. You might have been?

19 A. I could have been. I could have been under  
20 18, over 18.

21 Q. The other girl, she could have been over  
22 18?

23 A. She could have been, she could have not  
24 been. Jeffrey liked having a lot of young girls around  
25 him. I'm not too sure.

1 Q. You don't know one way or the other whether  
2 the girl was a minor?

3 A. I didn't ask her the age.

4 Q. Other than the girl you're not sure whether  
5 she was a minor, are there any girls you are sure were a  
6 minor who you think had sex with Professor Dershowitz?

7 A. Not that I know of.

8 Q. So would it be correct that you actually  
9 don't know one way or the other whether Professor  
10 Dershowitz had sex with any minors other than you claim  
11 yourself?

12 MS. MCCAWLEY: Objection. You can answer.

13 A. Yeah, I don't know. It would hard to say.  
14 Jeffrey, like I said, had lots of young girls around all  
15 the time and some of them were very young and some of  
16 them were on the cusp of 18, 19. So it's very hard to  
17 speculate how old exactly she was.

18 Q. So you don't know?

19 A. I don't know.

20 Q. Other than yourself, Jeffrey, Professor  
21 Dershowitz and this other woman of unknown age, was  
22 anybody else on the plane besides the pilot?

23 A. Pilot.

24 Q. That's it?

25 A. Yes.

1 Q. Putting aside ages, whether they were  
2 minors or not, other than this one girl you say had sex  
3 with Professor Dershowitz on a plane, are you aware of  
4 any other girls with whom you believe Professor  
5 Dershowitz had sex?

6 A. Professor Dershowitz was around a lot and  
7 there was always young girls around a lot and I  
8 physically did not see him with any other girls besides  
9 the ones that we're talking about right now and myself,  
10 but no, I'm not too sure.

11 Q. You don't know of any, correct?

12 A. Not that I physically witnessed.

13 Q. How tall is Professor Dershowitz?

14 A. I don't know.

15 Q. Is he closer to 5'5" or 6"?

16 A. Goodness, 5'5", 5'6", 5'7", he's not 6".

17 Q. Does he have any distinguishing  
18 characteristics?

19 A. Like are you asking me skin color?

20 Q. Any distinguishing physical  
21 characteristics, whatever that might mean to you?

22 A. He's older, he's -- I don't know what you  
23 mean. Like does he have a mole in a specific place, is  
24 that what you're asking me?

25 Q. Anything that might occur to you?



1 A. No, not that I know of.

2 Q. Did you know who he was before you met him  
3 the first time?

4 A. No.

5 Q. Now, one of the places that you say you had  
6 sex with Professor Dershowitz was in New Mexico, correct?

7 A. Yes.

8 Q. When was that?

9 A. Again, it's hard for me to place exact  
10 times and dates, but it wasn't snowing and it wasn't hot.  
11 So it could have been fall or spring. One thing that I  
12 do remember was Jeffrey was having his pool area painted  
13 and the massage room was just off the pool area.

14 Q. What else do you remember?

15 A. I remember the smell of paint. I remember  
16 later that evening there was a dinner party of a whole  
17 bunch of academic scientists, I guess, I'm not too sure.  
18 We weren't really allowed to have and make conversation  
19 with the people around us.

20 Q. How many people were at this dinner party?

21 A. I don't know the exact number, but over  
22 fifteen.

23 Q. Anybody that you recall, anybody famous?

24 A. No, nobody famous that I recall, I'm just  
25 showing that they are distinguished in their own way, but

1 besides Alan Dershowitz, Jeffrey Epstein, Ghislaine  
2 Maxwell, Emmy Tayler, the house staff.

3 Q. Now, you said there was a dinner party with  
4 scientists and academics?

5 A. Yes.

6 Q. Were any of the scientists and academics  
7 that we talked about early today at that party?

8 A. Not that I remember. They could have been,  
9 but I was not there for anyone else.

10 Q. How did you get there?

11 A. By airplane, Jeffrey.

12 Q. You flew privately for that event?

13 A. Yes.

14 Q. How did you leave?

15 A. Privately.

16 Q. How long were you there?

17 A. Maybe anywhere between three days and a  
18 week.

19 Q. So at least three days?

20 A. At least three days.

21 Q. Who else was on the plane with you?

22 A. Jeffrey Epstein, Emmy Tayler, Ghislaine,  
23 myself, the pilots, possibly, Adam Perrylang, I can't  
24 remember. He was on the plane sometimes and sometimes  
25 not, so.

1 Q. Can you spell Adam's last name?

2 MS. MCCAWLEY: If you know.

3 A. Off the top of my head, P-E-R-R-Y-L-A-N-G.

4 Q. Who is Adam Perrylang?

5 A. A chef.

6 Q. Was Professor Dershowitz on the plane?

7 A. No.

8 Q. How did you know -- well, was this the  
9 first time you had met Professor Dershowitz?

10 A. No.

11 Q. How many times had you met him before this  
12 event?

13 A. Dershowitz was around a lot. So I mean, I  
14 couldn't count how many times I've met him.

15 Q. What's your best recollection?

16 A. Are you asking me to guess?

17 Q. I'm asking for your best recollection?

18 A. I couldn't give you a number. I'm not too  
19 sure. He was around a lot.

20 Q. When you say he was around, what do you  
21 mean by that?

22 A. He obviously did a lot of work with  
23 Jeffrey. I'm not too sure what that work was.

24 Q. Did you ever talk to him?

25 A. I was introduced to him.

1 Q. When were you first introduced to him?

2 A. I believe the first time I was introduced  
3 to him would have been in New York.

4 Q. Putting aside that first introduction, did  
5 you ever have a conversation with Professor Dershowitz?

6 A. Besides formalities, no?

7 Q. Did Professor Dershowitz tell you why he  
8 was in New Mexico?

9 A. No. I'm assuming there for the conference  
10 or the get together, the politicians get together, not  
11 politicians, sorry, academic get together.

12 Q. How did you know this was an academic get  
13 together?

14 A. Because they were talking about, most of  
15 the things, I can't really understand, just scientific  
16 stuff.

17 Q. Were you there for that portion of the  
18 evening?

19 A. Yes. I ate dinner at the table.

20 Q. Was there anything other than the dinner  
21 that was going on during this three-day to one week stay  
22 in New Mexico?

23 A. Generally they're always was. I mean, I  
24 would do horseback riding, I would go for walks. If  
25 you're asking if there was another event, no, but that

1 was one of Jeffrey's places he liked to stay.

2 Q. Where did Professor Dershowitz stay?

3 A. Upstairs in the room.

4 Q. How long did he stay?

5 A. I'm not too sure.

6 Q. What's your best recollection?

7 A. I only remember seeing him there for a day?

8 Q. And you didn't see him -- was this dinner  
9 party at the end of the your trip there?

10 A. The first day.

11 Q. So then after the first day you didn't see  
12 Professor Dershowitz again?

13 A. I didn't see anyone else except for  
14 obviously Epstein, Maxwell, Tayler, the house staff.

15 Q. How many people other than Professor  
16 Dershowitz stayed at the ranch during this trip?

17 A. Nobody else stayed except for the people I  
18 just mentioned.

19 Q. I'm sorry, I thought that Professor  
20 Dershowitz spent the night?

21 A. He could have spent the night, but I'm  
22 saying I didn't see him the next day. I don't know if he  
23 left that day or I don't know if he stayed the night, but  
24 all the rooms were upstairs. If he would have stayed, he  
25 would have stayed upstairs.

1 Q. So you don't know one way or the other  
2 whether he did stay?

3 A. No, I don't know whether he did stay.

4 Q. What year was this?

5 A. I don't know. I was with Jeffrey from 1999  
6 until 2002. So it's a broad spectrum of trying to  
7 remember times and dates.

8 Q. You definitely remember this dinner party,  
9 right?

10 A. Yes.

11 Q. You remember that there were 15 or so  
12 academics and scientists, right?

13 A. Yes.

14 Q. And you remember that you had sex with  
15 Professor Dershowitz, right?

16 A. Yes.

17 Q. You remember everybody left after that  
18 dinner party, right?

19 A. Yes.

20 Q. So what would help you fix this in your  
21 mind, had you already met Prince Andrew before this  
22 dinner party?

23 A. You know, I don't think so, but I don't  
24 think so.

25 Q. Why do you say that?

1           A.       Because Prince Andrew happened when I was  
2 17, you know. I can't 100 percent say if it happened  
3 before or after and me trying to pin point that down just  
4 wouldn't work.

5           Q.       Did you tell anybody about having sex with  
6 Professor Dershowitz?

7           A.       Besides Epstein?

8           Q.       So you told Epstein?

9           A.       Yes, Epstein.

10          Q.       Did you tell anybody else?

11          A.       Maxwell.

12          Q.       Anyone else?

13          A.       I told my boyfriend at the time that I had  
14 met him.

15          Q.       Who was your boyfriend at the time?

16          A.       Tony Figueroa.

17          Q.       You didn't say anything else other than you  
18 had met Professor Dershowitz?

19          A.       I told him I was very upset from one of the  
20 things I had to do but he didn't fully comprehend what I  
21 was talking about.

22          Q.       Did you tell anybody else?

23                   MR. SCAROLA: Excuse me, can you set a time  
24 frame?

25 BY MS. BORJA:

1 Q. At any time in your entire life?

2 A. Oh, at any time?

3 MR. SCAROLA: Are we excluding  
4 attorney/client privileged communications?

5 BY MS. BORJA:

6 Q. Other than your attorneys, did you tell  
7 anybody else?

8 A. Yes, I told my best friend, Rebecca Boylan,  
9 my husband, Robert Giuffre, my mother, I think that's  
10 about it.

11 Q. When did you tell your mother?

12 A. Within the last couple of years.

13 Q. What did you tell her?

14 A. I didn't go into details with her. I just  
15 said that he's one of the people that abused me.

16 Q. Did you say anything else to your mother  
17 about Professor Dershowitz other than generally he abused  
18 you?

19 MS. MCCAWLEY: Objection, asked and  
20 answered.

21 SPECIAL MASTER: You can answer.

22 A. No, just I mean, obviously characterization  
23 about who he is and what he is, but I didn't go into  
24 details with her, if that's what you're asking.

25 Q. What did you tell Rebecca?



1 A. That he was one of my abusers.

2 Q. Did you say anything else?

3 A. About Dershowitz?

4 Q. Yes.

5 A. In regards to what?

6 Q. Did you say anything else about Professor  
7 Dershowitz to Rebecca?

8 A. I need a little more specifics. Did I tell  
9 her about the details?

10 Q. Anything else about Professor Dershowitz,  
11 anything? I'm not excluding or narrowing it in any way?

12 MS. MCCAWLEY: Objection. To the extent  
13 you can answer that.

14 A. I told her who he was, I told her -- I  
15 might have told her specifics I'm not too sure. I can't  
16 recall. We're going back make over a year ago.

17 Q. When did you have -- how many conversations  
18 did you have with Rebecca about Professor Dershowitz?

19 A. It wouldn't be like full blown  
20 conversations like long talks about it. It would be more  
21 from girlfriend to girlfriend, just, you know, this is  
22 what's happening in my life. You know, these are one of  
23 the people that abused me. These are one of the people  
24 that I'd like to get brought to justice for it. She  
25 would ask me questions like, what happened? I explained

1 to her what's going on. I don't know how many times I've  
2 had conversations with her.

3 Q. About Professor Dershowitz?

4 A. About Professor Dershowitz.

5 Q. Is Rebecca a truthful person?

6 A. I used to think she was.

7 Q. You don't think that now?

8 A. No.

9 Q. Have you had a falling out with Rebecca?

10 A. Yes.

11 Q. Have you called Rebecca and told her not to  
12 talk to Professor Dershowitz?

13 A. Not in that way. I told her, I can't  
14 believe that you are talking to somebody, in my own  
15 words, a pedophile.

16 Q. Did you tell her not to talk to anyone else  
17 about Professor Dershowitz?

18 A. Did I tell her not to talk to anybody else  
19 about Professor Dershowitz, like talking about her  
20 husband?

21 Q. Did you tell Rebecca not to talk to anybody  
22 about Professor Dershowitz?

23 A. Did I tell Rebecca not to talk --

24 MS. MCCAWLEY: Objection, to the extent you  
25 didn't understand the question you can ask for it

1 to be re-asked.

2 A. Can you -- I don't understand what you're  
3 asking.

4 Q. Why did you think that Rebecca was a  
5 truthful person in the past?

6 A. I've known her since I was a kid and I love  
7 her like a sister.

8 Q. In your experience in knowing her since you  
9 were a kid you found her to be truthful?

10 A. Yes, I have.

11 Q. When did you first tell Tony Figueroa about  
12 Professor Dershowitz?

13 A. I believe I was on the island, Jeffrey's  
14 island.

15 Q. What's your best estimate of when this was?

16 A. I don't know. It's always hot in the  
17 Caribbean so I can't pin point a season.

18 Q. Did you tell Rebecca that Professor  
19 Dershowitz, in your words, was a pedophile?

20 A. Yes, I did.

21 Q. Did you tell anybody else that?

22 MS. MCCAWLEY: Outside of the comments to  
23 the lawyer.

24 BY MS. BORJA:

25 Q. Other than your lawyers?

1           A.       The people that I've told you, my mom, my  
2 husband, as you said Rebecca, Michael, her husband might  
3 have been present on some of those conversations, but I'm  
4 not too sure if he was. Just my lawyers.

5           Q.       Did you ever tell the press that you had  
6 had sex with Professor Dershowitz?

7           MS. MCCAWLEY: Objection. Any questions  
8 regarding the press were already quashed by the  
9 judge and we have an order standing on that so  
10 there will be no questions regarding the press.

11          MS. BORJA: There is no such order from the  
12 Court.

13          MS. MCCAWLEY: There is and I'll be happy  
14 to pass it out.

15          SPECIAL MASTER: Can you please share?

16          MS. MCCAWLEY: They issued a subpoena duces  
17 tecum and he quashed certain discovery requests  
18 and that's included, any discovery relating to  
19 press. Here is a chart that has the request for  
20 the ones that should be quashed.

21          SPECIAL MASTER: I've read this. I've  
22 read --

23          MS. MCCAWLEY: Those that have the numbers  
24 he quashed. He quashed certain categories of  
25 discovery.

1 MS. BORJA: Can I be heard?

2 SPECIAL MASTER: Are you finished making  
3 your objection?

4 MS. MCCAWLEY: I just want to be clear that  
5 there are certain categories of discovery that he  
6 quashed in response to my motion to quash this  
7 deposition, and he narrowed out categories that  
8 were not subject to discovery in this case for  
9 this non-party witnesses.

10 SPECIAL MASTER: Okay. And I'm looking at  
11 both the order and a chart that was provided by  
12 MS. MCCAWLEY?

13 MS. BORJA: That's a duces tecum. The  
14 judge ruled on the production of documents. The  
15 judge did not narrow the scope of testimony of a  
16 fact witness in that way. She was not required to  
17 produce certain documents. We're certainly  
18 entitled to check the veracity of the witnesses'  
19 testimony.

20 SPECIAL MASTER: I'm going to overrule the  
21 objection. You can answer.

22 MS. MCCAWLEY: Can we take a break?

23 MS. BORJA: There's a question pending.  
24 You cannot take a break while there is a question  
25 pending.

1 MS. MCCAWLEY: We are going to take a break  
2 because this is a judge's order and we're going to  
3 determine whether we need to call Judge Lynch at  
4 this time to deal with this order. So we are  
5 going to take a break at this time.

6 MS. BORJA: I object to taking a break  
7 while there's a question pending.

8 SPECIAL MASTER: Well, I'm going to let her  
9 take a break so she can make her record. I need  
10 to allow her to protect it.

11 MS. BORJA: Can you put the time on the  
12 record?

13 THE VIDEOGRAPHER: Going off video record.  
14 10:23 a.m.

15 (A recess was taken.)

16 THE VIDEOGRAPHER: We are now back on video  
17 record 10:30 a.m.

18 SPECIAL MASTER: There was a question  
19 pending.

20 THE WITNESS: Would you like that to be  
21 answered now?

22 MS. MCCAWLEY: Really quickly I want to  
23 make my record in advance of her answering that.  
24 We believe that the questions, this line of  
25 questioning is in violation of Judge Lynch's order

1           where he struck certain requests relating to the  
2           subpoena, and we have a standing objection to that  
3           that we'll take up with Judge Lynch, but at this  
4           time we'll allow her to answer the question  
5           subject to our ability to strike that testimony as  
6           a result of it being non-applicable here because  
7           of his prior ruling.

8           SPECIAL MASTER: So you understand my  
9           ruling, I've reviewed, I've had an opportunity to  
10          review both the original objections made, the  
11          series of objections made to the duces tecum, the  
12          order, as well as the chart that was provided by  
13          Ms. McCawley with respect to what was stricken on  
14          the subpoena, and for the purposes of the record  
15          we'll go ahead and have this marked so we can  
16          preserve the record as to what I'm referring to,  
17          my ruling.

18          MS. BORJA: We can make them a compellation  
19          Exhibit VR 3.

20          (Thereupon, Defendant's VR Exhibit No. 3,  
21          was Marked for Identification.)

22          SPECIAL MASTER: My ruling stands, and I  
23          don't have an issue with you having a continuing  
24          objection, but the witness now can answer.

25          MS. MCCAWLEY: Do you want the question

1 read back to you?

2 THE WITNESS: No. Should I just go ahead  
3 and say it?

4 SPECIAL MASTER: Go ahead and read back the  
5 question?

6 (Last question read back by the court  
7 reporter.)

8 SPECIAL MASTER: Subject to the continuing  
9 objection, you can now answer.

10 A. I thought the question was if I ever called  
11 him a pedophile to the press. Wasn't that the question?

12 SPECIAL MASTER: No.

13 A. I did point him out to a journalist as one  
14 of my abusers.

15 Q. What journalist?

16 A. Sharon Churcher.

17 Q. When did you do that?

18 A. I believe it was 2011.

19 Q. What did you tell Ms. Churcher?

20 A. I just pointed him out.

21 Q. What do you mean?

22 A. I was given a picture to look at and he  
23 asked me which ones that I recognized as abusers and Alan  
24 Dershowitz was one of those.

25 Q. How many pictures did you look at?



1 A. I'm not too sure.

2 Q. What's your best recollection?

3 A. Over 40.

4 Q. Did you pick out anybody else as one of  
5 your abusers?

6 A. Yes.

7 Q. Who was that?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Jean  
9 Luc Brunel, Glen Dubin, Prince Andrew, I believe, that's  
10 all I can remember for now.

11 Q. Was one of the pictures of Les Wexner?

12 A. Possibly, yes.

13 Q. Was one of the pictures Richardson, Bill  
14 Richardson?

15 A. Again, possibly, yes. Probably, I'm not  
16 committing 100 percent to that, I can't remember exactly  
17 who she showed, but if they were there I would have  
18 pointed to them.

19 Q. Was one of the pictures of [REDACTED]?

20 A. Again, possibly yes. If they were there I  
21 would have pointed them out.

22 Q. Where did these pictures come from, do you  
23 know?

24 A. No.

25 Q. Were the people that were in photos that

1 you did not identify as individuals to whom you had been  
2 sexually trafficked?

3 MS. MCCAWLEY: Objection. You can answer.

4 A. Yes.

5 Q. Tell me everything you can recall telling  
6 Sharon Churcher about being sexual trafficked to Alan  
7 Dershowitz when you met with her in 2011?

8 MS. MCCAWLEY: Objection. I just want to  
9 be clear that I have a standing objection to this  
10 line of questioning.

11 SPECIAL MASTER: So noted. You can answer.

12 A. I just identified him. I don't think we  
13 actually got into any kind of details. It was going  
14 through a book of people kind of like the FBI does and  
15 pointing out. She was more interested in Prince Andrew.

16 Q. You met with Ms. Churcher for about a week;  
17 is that correct?

18 A. Yes.

19 Q. During the course of that week did you give  
20 Ms. Churcher any documents?

21 A. Yes, I had given her some pages out of a  
22 booklet that I had wrote concerning Prince Andrew.

23 Q. What is this booklet that you wrote?

24 A. She contacted me and asked me to recall the  
25 times that I was with Prince Andrew and I wrote them down

1 and I gave them to her.

2 Q. When did Ms. Churcher first contact you?

3 A. It would have been 2011.

4 Q. What did she say when she first contacted  
5 you?

6 A. She introduced herself. She asked me if I  
7 was a victim of Jeffrey Epstein. She was interested in  
8 how he got away with so many counts of abusing minors,  
9 and seeing that I was one of the minors she wanted to  
10 talk about that; and when she came over or before she  
11 came over she asked me about some of the people I had  
12 been with. I had said, well, I've got a picture of  
13 myself with Prince Andrew and she was very interested and  
14 she came over and wrote the article.

15 Q. Now, the picture that you had of Prince  
16 Andrew, that's an original photo that you developed,  
17 correct?

18 A. Yes.

19 Q. Do you still have the original?

20 A. It's been passed around a lot. I'm not too  
21 sure if mine is the original or not anymore.

22 Q. The photographs of you in New Mexico in the  
23 snow wearing your red jacket were those taken on your  
24 camera?

25 A. Yes, my camera.

1 Q. Do you have the originals?

2 A. Again, between the FBI and giving them to  
3 my lawyers and Sharon Churcher, the circulation, I'm not  
4 too sure if I have the originals. I know I have copies.  
5 So I'm not too sure if they're the originals.

6 Q. The booklet that you gave pages from to Ms.  
7 Churcher where is that booklet?

8 A. Burned.

9 Q. When did you burn it?

10 A. In, I think it was 2013. Me and my husband  
11 had a bonfire.

12 Q. What did you put in the bonfire?

13 A. Any kind of memories that I had written  
14 down about all the stuff going on.

15 Q. Had you written anything about Professor  
16 Dershowitz?

17 A. He could have been there, yes.

18 Q. And you burned that?

19 A. I wanted to burn my memories. I wanted to  
20 get rid of it. It was very painful stuff.

21 Q. Other than what you had written down did  
22 you burn anything else? I don't mean the wood, when you  
23 talk about burning your memories, what were you burning?

24 A. I was burning like memories, thoughts,  
25 dreams that I had, just everything that was kind of

1 affiliated with the abuse I endured, and there was a lot  
2 of it in there. My husband is pretty spiritual so he  
3 said the best thing to do would be burn them.

4 Q. Is there anything you decided to keep and  
5 not burn?

6 A. Just the photographs.

7 Q. Anything else that you can think of?

8 A. Photographs, that's it.

9 Q. Approximately when in 2013 was this  
10 bonfire?

11 A. I don't know what month it was.

12 Q. Did you do it outside?

13 A. Yeah, it was outside. I wasn't going to do  
14 it in my living room.

15 Q. Did it feel good to be close to the fire  
16 because it was cold out or was it a summertime bonfire?

17 A. I believe I had just bought my house in  
18 Titusville, Florida. I bought my house in, I think, I  
19 either got it October or November of 2013. It would have  
20 been around probably November.

21 Q. Why did you decide to keep the photos?

22 A. They're evidence.

23 Q. Do you have any photographs of yourselves  
24 with Professor Dershowitz?

25 A. No.

1 Q. Do you have any photographs of yourself at  
2 any of the locations at the times that you allege  
3 Professor Dershowitz was there?

4 A. Like there's not photographs of Dershowitz.

5 Q. Showing that you were at the locations at  
6 the time that you say Professor Dershowitz was there  
7 regardless of whether or not he was in the photograph?

8 A. I'm not too sure, I mean, it could have  
9 been the same week. I always carried around cameras so I  
10 took lots of pictures of everything. It could have been  
11 the same week, but he was definitely not in the  
12 photographs.

13 Q. After you gave Ms. Churcher the pages from  
14 that booklet did she give you a copy of those back?

15 A. I don't think so. Not that I remember.

16 Q. You gave her the original pages?

17 A. Yes.

18 Q. Are those the same pages that showed up in  
19 Radar Online?

20 A. Yes.

21 Q. How did they get them?

22 A. Not by me.

23 Q. Did you get paid for them?

24 A. No, not for those.

25 Q. You got paid for Ms. Churcher's interview?

1 MS. MCCAWLEY: Again, I just want to make  
2 sure that I have a standing objection to all of  
3 the testimony relating to the media.

4 A. Specifically I got paid for the picture.

5 Q. The picture of yourself with Prince Andrew?

6 A. Yes.

7 Q. Was there a contract?

8 A. I believe so.

9 Q. Who negotiated that?

10 A. Just Sharon and myself maybe the place that  
11 she works, I'm not too sure.

12 Q. You told the FBI that you got \$160,000 for  
13 that, is that right?

14 A. Yes.

15 Q. And is that a correct statement?

16 A. It was 140 and then for the articles  
17 \$10,000, and then \$10,000.

18 Q. So how does the picture fit into that?

19 A. What do you mean?

20 Q. You said it was 160 for the photo?

21 A. No, 140 for the --

22 Q. For the article?

23 A. Well, for the photograph and articles and  
24 then for the other articles, I don't think she just  
25 printed one article, I think she printed like three

1 articles if I recall correctly, but for the other one it  
2 was \$10,000 and then \$10,000.

3 Q. Were you paid for any other media  
4 interviews?

5 A. No.

6 SPECIAL MASTER: There is a standing  
7 objection to all this.

8 MS. MCCAWLEY: Yes.

9 BY MS. BORJA:

10 Q. Did Ms. Churcher give you any documents? I  
11 know she showed you pictures, did she give you anything?

12 A. No.

13 Q. Did Ms. Churcher tell you anything about  
14 Professor Dershowitz?

15 A. No.

16 Q. Other than you've named your mother, your  
17 boyfriend, Mr. Figueroa?

18 A. Yes.

19 Q. Your friend Rebecca and Sharon Churcher?

20 A. And my husband.

21 Q. Your husband, and putting aside your  
22 lawyers, did you tell anyone else that you were sexually  
23 trafficked to Professor Dershowitz?

24 A. The FBI.

25 Q. What did you tell the FBI?



1           A.     I just remember -- my memory recalls they  
2 did show me a photograph of everybody, if he was in those  
3 photographs I would have pointed him out. I'm just  
4 saying I could have possibly pointed him out in the  
5 pictures.

6           Q.     But do you recall doing that?

7           A.     I just know there was a lot of pictures and  
8 if he was in there I would have pointed him out to them.

9           Q.     Do you recall having any discussions with  
10 the FBI about Professor Dershowitz?

11          A.     I had discussions about a lot of people  
12 with him and I specifically don't remember if it was just  
13 -- if Alan was included in those, but if he was I would  
14 have told them what I know.

15          Q.     Did you talk to the FBI more than once  
16 about Professor Dershowitz?

17                 MS. MCCAWLEY: Objection, mischaracterizes  
18 the testimony.

19                 SPECIAL MASTER: You can answer.

20                 THE WITNESS: Does that mean go ahead?

21                 SPECIAL MASTER: Yes.

22          A.     I only met with the FBI one time, so no.

23          Q.     When you say that if you've been shown a  
24 picture you would have identified Professor Dershowitz  
25 you're talking about an in-person meeting in April 2011?

1           A.     I don't recall if it was April, but yes, I  
2 think it was 2011.

3           Q.     Shortly after the article in the Daily Mail  
4 came out?

5           A.     I think after about two weeks.

6           Q.     What else did you tell the FBI about being  
7 sexually trafficked?

8           A.     I've told them everything that I could  
9 remember at the time from the period of the years I was  
10 with Jeffrey Epstein.

11          Q.     Did you tell them about a prominent prime  
12 minister?

13          A.     Yes.

14          Q.     Did you tell them about heads of state?

15          A.     I'm not too sure what a head of a state is.

16          Q.     Did you tell them about prominent  
17 politicians?

18          A.     Yes.

19          Q.     Did you name them?

20          A.     Yes.

21          Q.     Did you tell the FBI about prominent  
22 business people?

23          A.     Yes.

24          Q.     Did you name them?

25          A.     Yes.

1 Q. What were the names of the politicians that  
2 you gave to the FBI?

3 A. The same names I've given to you.

4 Q. What were the names? You gave the FBI the  
5 name Bill Richardson?

6 A. Yes.

7 Q. And you gave the FBI the name [REDACTED]  
8 [REDACTED]?

9 A. Yes.

10 Q. Which prominent businessmen names did you  
11 give the FBI?

12 A. Glen Dubin, I mean, we're going back over a  
13 list that's very hard to continually go over, but Jean  
14 Luc Brunel, Glen Dubin. I'm trying to remember, but I'm  
15 having a blockage. I'm sorry.

16 Q. Did you name Les Wexner to the FBI?

17 A. Yes.

18 Q. Did you name any academicians specifically  
19 that you recall?

20 A. I named [REDACTED]. I mean, anyone  
21 that they would have pointed out to me and asked me I  
22 would have told them truthfully who I was with and what  
23 happened. I can't remember exactly who they showed me, I  
24 can't remember exactly who I told them about, but if they  
25 were there I would have told them.

1 Q. Did the FBI ask you about Bill Clinton or  
2 Al Gore?

3 A. I do believe they did ask me about Bill  
4 Clinton, but I cannot remember the exact conversation we  
5 had about him.

6 Q. I understand you were not sexual trafficked  
7 to Bill Clinton; is that correct?

8 A. Correct.

9 Q. Did Sharon Churcher ask you about Bill  
10 Clinton or Al Gore?

11 A. I believe they did.

12 Q. How many times did you meet Bill Clinton?

13 A. Twice.

14 Q. How many times did you meet Al Gore?

15 A. Once.

16 Q. You're meeting with Bill Clinton what was  
17 the first one?

18 A. I don't know the exact date. I know it was  
19 towards the end of my period with Jeffrey. I'm sorry, I  
20 can't give you a date.

21 Q. The end of your period with Jeffrey is  
22 September 2002, correct?

23 A. That was, yeah, when I left.

24 Q. That's the first time you meet Bill  
25 Clinton, towards the end of that period?

1           A.     No, it wasn't September. I'm not saying it  
2 was September. I'm saying it was around that period. If  
3 I was going to place times around something it would be  
4 towards the end of that.

5           Q.     Where were you the first time you met Bill  
6 Clinton?

7           A.     On Little Saint Jeff's, which is the  
8 island.

9           Q.     Little Saint James?

10          A.     He used to call it Little Saint Jeff's,  
11 sorry.

12          Q.     Meeting Bill Clinton?

13          A.     Generally or specifically about his  
14 personality?

15          Q.     Where were you on the island when you met  
16 him?

17          A.     We had a dinner together.

18          Q.     Who was at that dinner?

19          A.     Ghislaine, Emmy Tailer, Jeffrey Epstein,  
20 myself and two girls that I do not know who they are.

21          Q.     This is the meeting with Bill Clinton  
22 that's been described in press articles; is that correct?

23                 MS. MCCAWLEY: Objection. Go ahead. You  
24 can answer.

25                 SPECIAL MASTER: You can answer.

1           A.       Sorry. Confusing legal stuff. Yes, I  
2 believe it has been circulated.

3           Q.       You had a second meeting with Bill Clinton?

4           A.       Yes.

5           Q.       When was that?

6           A.       I believe very close together, within weeks  
7 if not months.

8           Q.       Where was it?

9           A.       Little Saint Jeff's.

10          Q.       What were the circumstances of your second  
11 meeting with Bill Clinton?

12          A.       Very similar, I mean, there was a dinner,  
13 lots of laughing, lots of joking, it was just a dinner  
14 and then I didn't have to do anything with Bill Clinton,  
15 he was never sexually involved with me. I've never  
16 witnessed him sexually involved with anybody else.  
17 Jeffrey asked me for a massage after dinner and I went  
18 off to Jeffrey's cabana.

19          Q.       Who was at that dinner?

20          A.       Ghislaine, Jeffrey Epstein, myself,  
21 Clinton, I believe there were -- there were some other  
22 guys, they were down by the beach. I'm not too sure who  
23 they were. I assume they were security of some sort.  
24 They weren't there at the dinner. There were two girls.

25          Q.       So each time you had dinner with Bill

1 Clinton there were two girls; is that correct?

2 A. From my recollection, yes, only two.

3 Q. And describe the two girls at the first  
4 dinner?

5 A. Young, beautiful like every girl that's  
6 generally around Jeffrey.

7 Q. Are you able to identify them?

8 A. Possibly if I was shown pictures, but I  
9 don't know their names. You need to understand, when I  
10 was with Jeffrey we were specifically told not to make  
11 friends, not to talk other than small talk. But we  
12 weren't like, hi, my name is Susan and I'm 15 or 19. We  
13 weren't like that.

14 Q. Was there any security at this first  
15 dinner?

16 A. Not at the table, but they always stayed  
17 around the beach.

18 Q. Who were the two girls at the second  
19 dinner?

20 A. It sounds funny, but I thought that they  
21 were sisters they looked so much alike. They had -- they  
22 were beautiful, they were youngish. I don't know exactly  
23 their age, but they were -- I don't know, it's hard to  
24 say, anywhere between 17 and 21, but I don't know their  
25 names.

1 Q. Was it the first dinner that Ghislaine  
2 Maxwell flew the helicopter with Bill Clinton to the  
3 island?

4 MS. MCCAWLEY: Objection.

5 SPECIAL MASTER: You can answer if you  
6 know.

7 A. I was only told that. I'm not too sure if  
8 she actually did or not. I never witnessed Ghislaine  
9 flying him, but she said she did.

10 Q. And did you hear Bill say that she was a  
11 good pilot?

12 A. I remember her saying he thought she was a  
13 good pilot but I never witnessed it myself.

14 Q. So it's possible she wasn't flying Bill  
15 Clinton in a black helicopter, that could be false?

16 MS. MCCAWLEY: Objection.

17 SPECIAL MASTER: You can answer.

18 A. To my knowledge Ghislaine and Jeffrey talk  
19 a lot, they say things that are sometimes hard to  
20 believe. Some are actually true, so I don't know.

21 Q. The second dinner, how did Bill Clinton get  
22 there?

23 A. Either by boat or by helicopter. There's  
24 only two ways to the island.

25 Q. So you don't know?



1 A. No.

2 Q. Tell me the circumstances of meeting Al  
3 Gore?

4 A. It's a little hazy at where that took  
5 place. I mean, we are going back a long time ago, but I  
6 do remember one thing about him, I thought he was a  
7 wonderful guy who loved his wife and they spent the  
8 entire time like there was nothing else around them, it  
9 was just those two. It was a dinner table, a long dinner  
10 table with people around, but they were just lovely, just  
11 watching them as a couple.

12 I remember thinking, you know, he's  
13 somebody that I would definitely vote for. He's just  
14 somebody that loves his wife that much.

15 Q. What was the purpose of this dinner?

16 A. As usual I'm not told these kind of things.  
17 I'm just kind of there to sit down and look pretty and  
18 keep my mouth shut.

19 Q. Who else was there?

20 A. I'm not too sure.

21 Q. This was on the island, right?

22 A. It could have been the island, but I could  
23 be mistaken if it was the island. It could have been New  
24 York. I'm not going to commit myself to saying it was  
25 definitely the island. My memory is still hazy when it

1 comes to locations or places. We were traveling  
2 everywhere a lot.

3 Q. And I understand that at some point you  
4 were using Xanax, correct?

5 A. Correct.

6 Q. At some point you were up to eight Xanax a  
7 day, correct?

8 MS. MCCAWLEY: Objection.

9 SPECIAL MASTER: You can answer.

10 A. I was suffering a lot mentally coping with  
11 what was happening and when I took Xanax it helped me  
12 forget a lot of things that I didn't want to think about  
13 for that day and it did help.

14 Q. At some point you were using eight Xanax a  
15 day as part of your --

16 A. To start with I was only taking one or two,  
17 but yes, it did get up to eight in the end.

18 Q. Did it affect your ability to recall  
19 certain events?

20 A. I would say any drug is going to do that to  
21 you. So, yes, you know, but I can tell you a thousand  
22 percent that just because I might not remember a location  
23 or a time doesn't mean I don't know a thousand percent  
24 the people that I was with or the people that abused me.

25 Q. You told the FBI that it affected your

1 ability to recall certain events, correct?

2 A. Yes.

3 MS. MCCAWLEY: Objection. Give me a chance  
4 to object.

5 BY MS. BORJA:

6 Q. Do you know approximately when you were up  
7 to eight Xanax a day?

8 A. Towards the end.

9 Q. What does that mean to you?

10 A. Probably from 19 onwards or no, sorry, 18  
11 onwards.

12 Q. Were you using any other medications or  
13 drugs in order to address your pain and suffering?

14 A. I did smoke marijuana and sometimes at  
15 parties I would use Ecstasy.

16 Q. Anything else?

17 A. No.

18 Q. How often were you smoking marijuana?

19 A. Considering I was with Jeffrey most of the  
20 time, not then, but whenever I went back to Palm Beach to  
21 see my boyfriend. Maybe once a week out of a month.

22 Q. How often were you using Ecstasy?

23 A. At parties. I don't know. I mean, it  
24 wasn't a regular basis, it was because if I was at a  
25 party with a whole bunch of kids. If it was there, I

1 would take it.

2 Q. Did you use it during times what you were  
3 being sexual trafficked?

4 A. No.

5 Q. How often were these parties when you were  
6 taking it?

7 A. How often were the parties? It varies, it  
8 could be -- like are we talking about yearly basis,  
9 because it wasn't every month.

10 Q. Okay. During the time frame 1999 to 2002?

11 A. Probably about fifteen parties. That's a  
12 rough estimate. No way is that a certain number.

13 Q. Other than the marijuana, the Ecstasy, and  
14 the Xanax were there any other medications, or alcohol  
15 that you were using?

16 A. Oh, alcohol, yes. I was drinking alcohol  
17 at the parties.

18 Q. Did you drink alcohol outside of parties?

19 A. Sometimes.

20 Q. At the dinners?

21 A. Sometimes.

22 Q. Anything else?

23 A. No.

24 Q. Did you -- you mentioned that you were  
25 about one week in your apartment with Mr. Figueroa. Was

1 that a consist arrangement through the period?

2 A. No, no, I'm just roughly saying that, you  
3 know, if I was home with Tony, at my apartment with Tony  
4 and it was for a week, that would be how long I smoked  
5 marijuana for. I wasn't saying specifically I was there  
6 for a week. It could have been three days, it could have  
7 been five days, it could have been seven days, I'm not  
8 too sure.

9 Q. Between 1999 and 2002 how many places did  
10 you live?

11 A. Like my own or like Jeffrey's residences?

12 Q. Putting aside when you were staying at a  
13 home, one of the mansions that Mr. Epstein owned, how  
14 many places did you live?

15 A. Just one.

16 Q. That was an apartment building?

17 A. Actually, let me correct that. At first I  
18 lived at my parents house and then I got an apartment.

19 Q. You lived at that apartment the entire  
20 period between 1999 and 2002?

21 MS. MCCAWLEY: Objection. Go ahead.

22 A. Besides my parent's house, yes, that's the  
23 only place I lived.

24 Q. During what period did Mr. Figueroa live  
25 with you?

1           A.       On and off, but from, I don't know when our  
2 relationship actually started. I think I was with  
3 Jeffrey before. Yes, I was with Jeffrey already.

4           Q.       So on and off between 1999 and 2002?

5           A.       Yes.

6           Q.       Is Mr. Figueroa a truthful person?

7           A.       I believe so.

8           Q.       Why did you say -- what's the basis for  
9 your statement earlier that you didn't think Mr. Figueroa  
10 understood what you were telling him about Professor  
11 Dershowitz?

12                   MS. MCCAWLEY: Objection.

13                   SPECIAL MASTER: You can answer.

14           A.       He was my boyfriend and I didn't really get  
15 into too much details with him.

16           Q.       But you specifically named Professor  
17 Dershowitz as one of your abusers?

18           A.       Yes.

19           Q.       Did you name other abusers to Mr. Figueroa?

20           A.       Yes.

21           Q.       Who did you tell him was sexually abusing  
22 you?

23                   MS. MCCAWLEY: Objection. Mischaracterized  
24 the testimony.

25                   SPECIAL MASTER: You can answer if you can.

1           A.       The same people that I've named to you. He  
2 wouldn't have understood some of the names, he wouldn't  
3 have known who they were, but anyone prominent such  
4 Prince Andrew, he would have recognized that. But  
5 generally I would call him every day when I was with  
6 Jeffrey and tell him what happened.

7           Q.       You would say the names of the people you  
8 had sex with?

9           A.       Sometimes, I mean, you know, sometimes I  
10 would just say I've had a really hard day, that is what  
11 I've had to do and we wouldn't get into names. Sometimes  
12 I would.

13          Q.       Tell me about the first time you met  
14 Professor Dershowitz?

15          A.       Are we talking sexually or just introduced.

16          Q.       The very first time you ever met Professor  
17 Dershowitz?

18          A.       I believe it was in New York in Jeffrey's  
19 office.

20          Q.       What were the circumstances of you being  
21 there?

22          A.       To please Jeffrey.

23          Q.       What were the circumstances of Professor  
24 Dershowitz being there?

25          A.       No idea, I never asked about the business.

1 Q. Who else was there?

2 A. House staff, Ghislaine, Emmy.

3 Q. In this office with yourself Professor  
4 Dershowitz and Jeffrey Epstein?

5 A. I don't know exactly who was in there. I'm  
6 just saying who was at the house. I'm not too sure who  
7 was in the office. I remember being introduced to him in  
8 Jeffrey's office, and no, I cannot recall anyone else  
9 being there.

10 Q. What office is there?

11 A. In his mansion in New York.

12 Q. Can you tell me where that office is?

13 A. Up a flight of stairs to your left.

14 Q. How long was this meeting?

15 A. Short, brief. I was already in there with  
16 Jeffrey when Dershowitz walked in and I was introduced.

17 Q. How long was this meeting?

18 MS. MCCAWLEY: Objection, asked and  
19 answered.

20 SPECIAL MASTER: You can answer if you can.

21 A. Ten, fifteen minutes.

22 Q. When was the next time that you met  
23 Professor Dershowitz?

24 A. This is very hard for me to remember. Like  
25 I said, he was around a lot so I've seen him in Palm



1 Beach, I've seen him in New York. So I mean, if we're  
2 going to pin point how many times I've seen him or the  
3 next time I saw him after that I don't know.

4 Q. Then tell me -- let's do it this way, what  
5 was the most recent time that you recall having sex with  
6 Professor Dershowitz?

7 MS. MCCAWLEY: Objection.

8 SPECIAL MASTER: You can answer.

9 A. The first time I recall having sex with  
10 Professor Dershowitz was in New York.

11 Q. My question was, the most recent time now.  
12 What's the most current, most recent memory of having sex  
13 with Professor Dershowitz?

14 MS. MCCAWLEY: Objection. Just so I'm  
15 clear, you're going backward?

16 MS. BORJA: Correct.

17 MS. MCCAWLEY: The last time.

18 A. The last time that I remember having sex  
19 with him? Okay. I believe it was on an airplane.

20 Q. Where were you going?

21 A. On, I believe it was Massachusetts. I  
22 don't know. It's very hard for me to remember exactly  
23 where we were going, what were the circumstances.

24 Q. So that's the time you testified about  
25 earlier?

1 A. Yes, ma'am.

2 Q. What was the time prior to that?

3 A. You know chronologically it's impossible  
4 for me to place these in order. I can tell you about  
5 events, but if we're going to say chronologically,  
6 correct, it would be impossible.

7 Q. Well, you say there was six times, right,  
8 you were very specific about that?

9 MS. MCCAWLEY: Objection.

10 SPECIAL MASTER: Let her get her question  
11 out. Go ahead.

12 BY MS. BORJA:

13 Q. You're very specific about that, right?

14 MS. MCCAWLEY: Objection.

15 SPECIAL MASTER: You can answer.

16 A. I am specific about the fact that I know I  
17 have been with Alan Dershowitz at least six times, if not  
18 more.

19 Q. So let's talk about what you know about  
20 those six times. Let's start with, you can pick any one  
21 other than the flight that we've talked about?

22 A. Okay. New York.

23 Q. Okay. Let's start with New York?

24 A. I was upstairs in Jeffrey's room with  
25 Jeffrey.

1 Q. When you say Jeffrey's room, do you mean  
2 his bedroom?

3 A. Yes.

4 Q. Okay.

5 A. There's a shower in the middle of that room  
6 and I had just finished having a shower with Jeffrey.  
7 Jeffrey got out of the shower, got dressed and left the  
8 room. He was wearing sweat pants if I recall and while  
9 I'm undressed and drying myself off and drying my hair  
10 Dershowitz entered the room and there was some red velvet  
11 chair that I remember -- I don't know, is there a certain  
12 language you want me to use to describe these events?

13 Q. No.

14 MS. MCCAWLEY: Just use whatever you're  
15 comfortable with, that's fine.

16 A. We had sexual intercourse on the chair  
17 while I was bent over.

18 Q. How long did that last?

19 A. Less than ten minutes.

20 Q. Did you speak to the Professor?

21 A. Just formalities, but at this time Jeffrey  
22 had before trained me to do what he wanted me to do.

23 Q. When you say just formalities, what do you  
24 mean?

25 A. Hi, nice to see you again, how are you? I

1 mean, that could have not been exactly what was said, but  
2 those are generalities of what was said.

3 Q. Who else was in the house at this time?

4 A. Epstein for a fact. I'm not too sure about  
5 Ghislaine and Emmy, they could have been. Definitely  
6 house staff.

7 Q. Who?

8 A. Joe Joe and there was another Philippine  
9 lady, I'm not too sure.

10 Q. How often were you sexual trafficked in  
11 Jeffrey Epstein's private bedroom?

12 MS. MCCAWLEY: Objection. Which bedroom  
13 are you talking about?

14 BY MS. BORJA:

15 Q. The same bedroom in New York that you were  
16 talking about?

17 A. That's actually the only time besides with  
18 Jeffrey. I mean, Jeffrey countless, but there was no  
19 other men brought to Jeffrey's room.

20 Q. Who brought Professor Dershowitz to this  
21 room?

22 A. I have no idea, I'm assuming Epstein.

23 Q. Help me figure this out. Epstein had just  
24 left the room?

25 A. Epstein exits the room, Dershowitz walks

1 in.

2 Q. Same door?

3 A. Same door.

4 Q. How long before Jeffrey exiting and  
5 Professor Dershowitz walking in?

6 A. Minutes, not even, approximately  
7 60 seconds.

8 Q. Ten minutes later once the sex encounter  
9 ends, what happens next?

10 A. He pulled up his pants and I put my towel  
11 back on. I went upstairs to my room -- my room was  
12 downstairs, had another shower, I got dressed. I don't  
13 remember the rest of the day from there.

14 Q. Did you see Professor Dershowitz in the  
15 house again that day?

16 A. On that day?

17 Q. Right.

18 A. Possibly, I mean, I don't remember. I just  
19 remember that event very clearly.

20 Q. So it was unusual that somebody other than  
21 Jeffrey to whom you would be sexual trafficked would walk  
22 into Jeffrey's bedroom, is that fair?

23 A. Yes.

24 Q. Did you ask anybody how that came to be?

25 A. No, it was expected of me.

1 Q. Did you talk to Jeffrey about it?

2 A. Yes.

3 Q. What did you tell Jeffrey?

4 A. Jeffrey asked me if he enjoyed it, I said  
5 yes.

6 Q. So the act was consummated?

7 MS. MCCAWLEY: Objection.

8 A. What does consummated mean?

9 MS. MCCAWLEY: If you don't know you don't  
10 answer.

11 SPECIAL MASTER: Rephrase that.

12 BY MS. BORJA:

13 Q. What do you mean by your testimony that  
14 Professor Dershowitz enjoyed it?

15 MS. MCCAWLEY: Objection. Mischaracterizes  
16 the testimony.

17 SPECIAL MASTER: You can answer if you can.

18 A. I don't even understand. What do you mean,  
19 did he enjoy it?

20 MS. MCCAWLEY: Take a deep breath. She can  
21 re-ask the question.

22 A. He enjoyed it, yes. From what it looked  
23 like, my God, yes, he enjoyed it.

24 Q. Why do you say that?

25 MS. MCCAWLEY: Take a deep breath.

1 A. He ejaculated. He was happy.

2 Q. Tell me about the next incident that you  
3 can recall of the sex?

4 MS. MCCAWLEY: Do you want to take a break?

5 THE WITNESS: Yes, absolutely.

6 SPECIAL MASTER: Let's take a break, five  
7 minutes.

8 THE VIDEOGRAPHER: Going off video record,  
9 11:11 a.m.

10 (A recess was taken.)

11 THE VIDEOGRAPHER: We are now back on video  
12 record 11:31 a.m., disk number 2.

13 BY MS. BORJA:

14 Q. Is there anything else that you can recall  
15 that would help you to place the time frame of this  
16 sexual encounter of Professor Dershowitz in New York?

17 A. No, not that I can remember.

18 Q. Do you recall whether it was before or  
19 after the first time you met Prince Andrew?

20 A. Before.

21 Q. About how long before do you think?

22 A. I don't know. It was fairly early on in my  
23 relationship with Jeffrey that I first met him, but it  
24 was after my training so I'm not too sure.

25 Q. And your training was about nine months, is

1 that fair?

2 MS. MCCAWLEY: Objection.

3 SPECIAL MASTER: You can answer.

4 A. No, my training wasn't about nine months.

5 MR. SIMPSON: Can you ask her to speak up  
6 just a little bit? I'm having a hard time  
7 hearing.

8 MS. MCCAWLEY: Okay. We'll do our best,  
9 but she got sick during the break. Let's just be  
10 happy that we're here and we're getting this.

11 SPECIAL MASTER: Let's move on. Let's move  
12 on, please.

13 (Thereupon, VR Defendant's Exhibit No. 4,  
14 was Marked for Identification.)

15 BY MS. BORJA:

16 Q. Ms. Roberts, I've handed you a document  
17 that's been marked as VR 4 which is dated April 7th, 2011  
18 and it reflects on the top, participant Jack Scarola,  
19 Brad Edwards, Virginia Roberts, and the document has a  
20 bates number non-party VR 178 through 200. Do you have  
21 that?

22 A. Yes, I do.

23 Q. Have you seen this document before?

24 A. Yes, I have.

25 Q. Did you see a draft of this document before



1 this version?

2 A. I'm sorry, I don't understand what you  
3 mean.

4 Q. Have you seen more than one version of this  
5 transcript of the telephone conference?

6 A. Not that I'm aware of.

7 Q. Do you recall receiving a draft and making  
8 any edits to it?

9 A. Not that I'm aware of. There's a lot of  
10 documents that I've gone through so it's a possibility.

11 Q. You say you've seen it before, correct?

12 A. Yes.

13 Q. When did you first see it?

14 A. I don't know the first time I saw it. I  
15 remember seeing it recently, but I don't remember the  
16 first time I saw it.

17 Q. Did you see it shortly after your telephone  
18 conversation with Jack Scarola and Brad Edwards?

19 MS. MCCAWLEY: Objection. Can we have a  
20 time frame on this document, please?

21 SPECIAL MASTER: Could you please recite a  
22 time frame?

23 BY MS. BORJA:

24 Q. You had a telephone conversation with Jack  
25 Scarola and Brad Edwards in April 2011, do you recall

1 that?

2 A. I recall the telephone conversation, yes.

3 Q. And after you had that telephone  
4 conversation did you see a transcript of the  
5 conversation?

6 A. I don't know. I don't remember.

7 Q. Have you actually read this document?

8 A. Yes, I have.

9 Q. Is the document accurate to the best of  
10 your knowledge?

11 A. Yes, I mean, there's a couple small things  
12 like my middle name is not Louise, I wasn't living in  
13 Australia for 19 years, but for the most part everything  
14 else is pretty correct.

15 Q. If you turn to page 10 of 23?

16 MS. MCCAWLEY: They're numbered at the top,  
17 at the very top in the corner. You see there?

18 A. Yes.

19 Q. Do you have that page?

20 A. Yes, I do.

21 Q. About halfway down the page Mr. Scarola  
22 asked you, okay, and how long after you first met Jeffrey  
23 did he first ask you to provide services for one of his  
24 friends? You answered, about nine months I think it was.  
25 It wasn't a full year, it wasn't six months, it was

1 between six months and a year which is why I'm saying  
2 nine months. Do you see where I am reading?

3 A. Yes, I do.

4 Q. Is that truthful and accurate?

5 MS. MCCAWLEY: Objection.

6 SPECIAL MASTER: You can answer.

7 A. It's as close to what I can remember, but I  
8 hadn't given it much thought at that time, but it's  
9 close.

10 Q. Well, within 60 days of this telephone call  
11 you had met with Ms. Churcher, right?

12 MS. MCCAWLEY: Objection.

13 SPECIAL MASTER: You can answer.

14 A. Within 60 days? We are talking about  
15 before the telephone call or after the telephone call?

16 Q. You met with Ms. Churcher before the  
17 publication of the Daily Mail article in March 2011,  
18 right?

19 A. Right.

20 MS. MCCAWLEY: Objection.

21 BY MS. BORJA:

22 Q. And you met with her for about a week,  
23 right?

24 MS. MCCAWLEY: Objection. I have an  
25 objection to all line of questioning relating to

1 the media.

2 SPECIAL MASTER: I understand. Proceed.

3 You can answer.

4 A. Yes, and that was her, must have been March  
5 if that's the date she called.

6 Q. And during the week that you met with Ms.  
7 Churcher she showed you photos of people, correct?

8 A. Yes.

9 Q. And you thought about whether they were  
10 abusers, correct?

11 MS. MCCAWLEY: Objection.

12 BY MS. BORJA:

13 Q. And she talked to you --

14 MS. MCCAWLEY: Sorry, let me have my  
15 objection. If you can pause for a moment. Go  
16 ahead.

17 SPECIAL MASTER: You can answer. You did  
18 answer. Move forward.

19 BY MS. BORJA:

20 Q. And she talked to you about your time with  
21 Jeffrey Epstein and being sexually trafficked; is that  
22 correct?

23 MS. MCCAWLEY: Objection.

24 SPECIAL MASTER: You can answer.

25 A. Yes.

1 Q. And then an article came out about it,  
2 right?

3 MS. MCCAWLEY: Objection.

4 A. Yes.

5 Q. And people called you about that article,  
6 correct?

7 MS. MCCAWLEY: Objection.

8 A. Yes.

9 Q. And so you had a meeting for a week, you  
10 looked at pictures, you talked to Ms. Churcher, an  
11 article came out, you talked to people, and this is  
12 happening right around February, March 2011, correct?

13 MS. MCCAWLEY: Objection.

14 SPECIAL MASTER: You can answer.

15 A. Yes.

16 Q. And now April 7th you have a telephone call  
17 with Mr. Scarola and Mr. Edwards, correct?

18 A. Yes.

19 Q. So you had had time with Ms. Churcher, with  
20 your friend calling, with the article to think about  
21 these activities, correct?

22 A. Yes.

23 MS. MCCAWLEY: Objection.

24 BY MS. BORJA:

25 Q. And your best recollection in April of 2011

1 was that about nine months, it wasn't a full year, it  
2 wasn't six months, but between six months and a year,  
3 which is why I'm saying nine months. That it was your  
4 best recollection as to the time frame at that point  
5 after you first met Jeffrey when he asked you to provide  
6 services for one of his friends. Is that fair?

7 MS. MCCAWLEY: Objection.

8 A. As you can see in that answer I'm not even  
9 sure. It wasn't six months, but between six months and a  
10 year which is why I'm saying nine months. It was an  
11 assumption.

12 Q. Was it your recollection at the time?

13 MS. MCCAWLEY: Objection.

14 A. It was my best assumption. It could have  
15 been three months for all I know, it could have been six  
16 months for all I know, but it's an assumption.

17 Q. It could have been a year for all you know,  
18 then, right?

19 MS. MCCAWLEY: Objection.

20 A. No.

21 Q. Why is three months fair and twelve months  
22 not fair?

23 A. Because it wasn't that long.

24 Q. But has your memory improved since 2011?

25 MS. MCCAWLEY: Objection, argumentative.

1           Go ahead.

2           A.     Going through everything that I have gone  
3 through over and over and over again, yes, it has.

4           Q.     So is your memory improving over time about  
5 the events?

6           A.     It's not improving.

7           MS. MCCAWLEY:  Objection, sorry, let me  
8 just -- objection, argumentative.

9           SPECIAL MASTER:  You can answer.

10          A.     It's not that it's improving over time, but  
11 the more that I talk about it, the more I am able to  
12 remember stuff.

13          Q.     Are there things that you remember now that  
14 you didn't tell Ms. Churcher in your interview?

15          A.     Definitely a possibility.

16          Q.     You don't know one way or the other?

17          A.     She didn't ask me everything and I didn't  
18 tell her everything.

19          Q.     Why did she call you, do you know?

20          A.     I think I've answered this previously,  
21 haven't I?

22          SPECIAL MASTER:  You can answer it again.

23          MS. MCCAWLEY:  You can answer it to the  
24 extent you can recall.

25          A.     She called me because she was interested in

1 the Jeffrey Epstein saga, so to speak.

2 Q. Did Ms. Churcher tell you she had talked to  
3 anybody else before she talked to you?

4 A. Like in order to get my number or?

5 Q. No, about the same subject matter that she  
6 was asking you about?

7 A. I'm not aware of her conversations with  
8 other people.

9 Q. I'm asking you what she told you. Did she  
10 tell you she had talked to other people?

11 MS. MCCAWLEY: Objection, asked and  
12 answered.

13 A. I'm thinking. I can't recall a specific  
14 person that she said, but I'm sure she did talk to other  
15 people about this. I know she talked to the Daily Mail  
16 to see if we could run the story.

17 Q. After you gave the telephone interview to  
18 Mr. Scarola did you call him and say anything that you  
19 told him was wrong, incorrect I should say, from your  
20 telephone conversation?

21 A. No, not that I can remember, no.

22 (Thereupon, VR Defendant's Exhibit No. 5  
23 was Marked for Identification.)

24 MS. MCCAWLEY: I'm going to object to this.  
25 This has pictures of Virginia's children on this



1 and we have safety concerns here. We're not going  
2 to be putting this in the record, and I think any  
3 line of questioning regarding her kids or  
4 identification with respect to them is absolutely  
5 inappropriate. She's a non-party witness, she's a  
6 sexual abuse victim, and injecting her children  
7 into this is inappropriate.

8 MS. BORJA: I'm still going to mark this as  
9 an exhibit. This is under seal and if you want to  
10 take other steps after this that's up to you.

11 THE WITNESS: What do my children --

12 MS. MCCAWLEY: Hang on, take a deep breath.  
13 It's okay. We'll handle it.

14 SPECIAL MASTER: So explain to me why?

15 MS. BORJA: I asked haven't any questions  
16 yet.

17 SPECIAL MASTER: Well, explain to me about  
18 the exhibit. You can mark it, but we're going to  
19 keep it. I'm going to tell you what, other than  
20 after the lawyers see that, let's put the copies  
21 here and we're going to hold those separately and  
22 apart from the rest of the exhibits because I tend  
23 to agree with Ms. McCawley's concern on this. So  
24 proceed with the question on that grounds.

25 BY MS. BORJA:

1 Q. Ms. Giuffre, the document that's been  
2 marked as VR Exhibit 5 is a compellation exhibit with two  
3 pages from a Facebook profile. Do you have that?

4 A. Yes, I do.

5 Q. Is this a Facebook profile that you  
6 created?

7 A. Yes, it is.

8 Q. Did you input pictures into it?

9 A. I sure did.

10 Q. Is page 1 an accurate depiction of your  
11 Facebook profile?

12 A. Yes.

13 Q. And the second page of this exhibit, it  
14 says Virginia Giuffre, November 11, 2013. Do you see  
15 that?

16 A. Where am I looking at?

17 Q. At the top under the name Virginia Giuffre,  
18 it says November 11, 2013. Do you see that?

19 A. Yes, I see that.

20 Q. And is this an entry that you made into  
21 your Facebook account?

22 A. Yes.

23 Q. You posted the picture?

24 A. Yes.

25 Q. Do you know below the first entry under the

1 photos says high buddies, we'd love to hear from our pen  
2 pals across the sea. Our new address is, and it states  
3 an address there and goes on. Do you see where I'm  
4 reading?

5 A. Yes.

6 Q. Did you make that entry into your Facebook  
7 profile?

8 A. Yes.

9 Q. And is this a true and accurate depiction  
10 of that entry that you made?

11 A. Yes.

12 SPECIAL MASTER: Is that it?

13 MS. MCCAWLEY: I'm going to ask to the  
14 extent that the exhibit gets used at all that  
15 every picture of her children is redacted. If you  
16 want to leave the date, that's fine.

17 THE WITNESS: Can I also ask why --

18 SPECIAL MASTER: Hold on one second.

19 MS. MCCAWLEY: It's okay.

20 SPECIAL MASTER: Do you have an objection  
21 to the redaction of the children?

22 MS. BORJA: I do in this regard, and I  
23 would like to make my objection on the record  
24 without the witness present.

25 SPECIAL MASTER: Without the witness

1 present?

2 MS. BORJA: Correct.

3 SPECIAL MASTER: All right. Let's hold  
4 that because I don't want to lose this. We'll go  
5 back to that on the next break. When the witness  
6 takes a break we'll go ahead and put that on the  
7 record, but in the meantime let's go ahead and put  
8 the exhibit -- you hold yours and we'll hold the  
9 rest of them there.

10 MS. BORJA: There's several copies here.

11 SPECIAL MASTER: Put them there. Ms.  
12 McCawley, as a officer of the Court will you take  
13 those exhibits and then on a break put them in an  
14 envelope and mark them and I'll seal them right  
15 away so this way you can take provisions on that.

16 MS. MCCAWLEY: Okay.

17 SPECIAL MASTER: Thank you. And then we  
18 can go ahead at the next break you can make your  
19 objection at that point. Go ahead, proceed.

20 BY MS. BORJA:

21 Q. Ms. Roberts, we've been talking about when  
22 you claimed you were sexually trafficked to Professor  
23 Dershowitz and you talk about three of the incidents that  
24 are reflected in the joinder motion. Let's go through  
25 the other three. Pick any of them?

1 A. Which ones have I told you about so far?

2 Q. You had mentioned on a plane, New York, and  
3 New Mexico?

4 A. Okay. Let's to go Palm Beach.

5 Q. When was this?

6 A. I don't have a significant date for you.

7 Q. Was it before or after you met Prince  
8 Andrew?

9 A. Before.

10 Q. How do you know that?

11 A. Because I hadn't met Prince Andrew at that  
12 time.

13 Q. What do you recall about -- that helps you  
14 place the time of this meeting in Palm Beach?

15 A. It's Florida, it's sunny, it's always hot.  
16 I have no idea.

17 Q. Do you have any idea when it was?

18 A. No idea.

19 Q. How do you know it's before you met Prince  
20 Andrew?

21 A. I hadn't met Prince Andrew by then. I  
22 don't know how else you want me to answer that.

23 Q. Well, if you have no idea when it is?

24 A. I'm telling you.

25 MS. MCCAWLEY: Objection, argumentative.

1                   SPECIAL MASTER: Let her get a question  
2                   out. Let her get a question out then you can  
3                   object.

4 BY MS. BORJA:

5                   Q.       What markers are you using to identify for  
6 yourself it was before -- let's say you met Prince Andrew  
7 in March 2001 how are you able to know that this event in  
8 Palm Beach was before March 2, 2011?

9                   MS. MCCAWLEY: Objection, assumes facts not  
10                  in evidence. You can answer.

11                  SPECIAL MASTER: You can answer.

12                  A.       I recall meeting Prince Andrew and it was a  
13 very significant event and I can tell you it was before I  
14 met Prince Andrew.

15                  Q.       How many times after you met Prince Andrew  
16 were you sexually trafficked to Professor Dershowitz?

17                  A.       I don't know.

18                  Q.       Were there any?

19                  A.       I cannot chronologically give you the  
20 answer to that, I'm sorry. There is no way for me to do  
21 that. You know, could there have been times after Prince  
22 Andrew that I was with Dershowitz absolutely, but do I  
23 know for a fact no, I don't.

24                  Q.       Is that true for all six?

25                  A.       Yes, that's true for all six, I don't know.

1 Q. Who else was there in Palm Beach?

2 A. Same people, Jeffrey, Ghislaine, Juan  
3 Alessi, he's the butler. I'm trying to remember if Emmy  
4 Tayler was there. I'm pretty sure she would have been.  
5 She was always with Ghislaine. No one else significant  
6 that I can remember.

7 Q. So that's four instances. What are the  
8 other two?

9 A. So I've given you Palm Beach, New Mexico,  
10 there's the U.S. Virgin Islands, Little Saint Jeff's.

11 Q. Who else was there?

12 A. Jeffrey Epstein, Ghislaine Maxwell, I  
13 possibly want to say Adam Perrylang was there as the  
14 chef, Miles Caffé, I think that's it. I mean there's a  
15 possibility that there could have been another girl  
16 there, but I can't remember.

17 Q. Who is Miles?

18 A. He's like a house staff.

19 Q. What's your best recollection as to the  
20 time of year this was?

21 A. Well, like Florida the Caribbean is very  
22 hot all year round so it's hard to depict what time of  
23 year it was.

24 Q. I understand it's hard. What's your best  
25 recollection as you sit here today under oath?

1           A.       That's what I'm trying to tell you is I  
2 don't know. I don't know because it doesn't get cold in  
3 the USVI so there's no way to really tell you it was  
4 winter or fall or spring or summer because it's always  
5 hot.

6           Q.       Where did you go next after that trip?

7           A.       I don't know.

8           Q.       How long was Professor Dershowitz down  
9 there?

10          A.       I think he was there from, just from any  
11 recollection two days.

12          Q.       Where did he stay?

13          A.       In one of the villas. He would have had  
14 to.

15          Q.       Where did you stay?

16          A.       In another one of the separate rooms.

17          Q.       When you were in Palm Beach, the time that  
18 you mentioned previously, how long was Professor  
19 Dershowitz there?

20          A.       I don't know. I had my own apartment in  
21 Palm Beach. I was called in for him.

22          Q.       How do you know you were called in for him?

23                   MS. MCCAWLEY: Objection.

24                   SPECIAL MASTER: You can answer.

25          A.       I normally got phone calls when I was in



1 Palm Beach when I was at my apartment to come in to give  
2 someone a massage.

3 Q. Did any guests get massages that were not  
4 sexual in nature?

5 A. Not that I was aware of. All the massages  
6 I gave were of a sexual nature except for Eva Anderson,  
7 sorry. I'm sorry, Eva Dubin, sorry.

8 Q. Did you ever see any male masseuses?

9 A. Once when I was at the island. He was  
10 there helping me train.

11 Q. Were that massages and that masseuse sexual  
12 in nature?

13 A. No, but it was a training. Not that kind  
14 of training, actual massage training.

15 Q. Were there ever any masseuses over the age  
16 of 25?

17 A. Yes, I think her name is Sheridan.

18 Q. Were there ever any over the age of 30?

19 A. The male one that we just talked about is  
20 over 30.

21 Q. Can you recall any others?

22 A. No.

23 Q. Do you know one way or the other whether  
24 there were any other masseuses over the age of 30?

25 A. Do I know of any other masseuses over the

1 age of 30?

2 Q. That were providing massages to Jeffrey  
3 Epstein?

4 A. Just the male that was teaching me on the  
5 USVI and Sheridan, but she was also involved in sexual  
6 acts. She wasn't over the age of -- she could have been  
7 around 30, but she would have been over 30.

8 Q. Did you keep a list of the masseuses who  
9 came to Epstein's properties?

10 A. No.

11 Q. Did some of them come only once?

12 A. Uh-huh.

13 Q. Are there some that came when you weren't  
14 there?

15 A. I wasn't there, how am I to know.

16 Q. You don't know if any came as a masseuse  
17 while you were not at Jeffrey Epstein's property?

18 MS. MCCAWLEY: Objection, asked and  
19 answered.

20 A. I wasn't there so I couldn't have.

21 Q. What's the sixth incident that you say  
22 happened where you were sexually trafficked to Professor  
23 Dershowitz?

24 A. We've talked about New York, we talked  
25 about Palm Beach, New Mexico, U.S. Virgin Islands, talked

1 about we took the airplane?

2 Q. Yes.

3 A. There was an instance in a car, but it was  
4 more -- it wasn't intercourse, it was more --

5 MS. MCCAWLEY: Use a term you're  
6 comfortable with.

7 A. More oral is the good term to use, oral  
8 sex.

9 Q. Where were you? Where was his car, what  
10 city, what state, what jurisdiction? Where were you?

11 A. This was in Massachusetts. It was a black  
12 limousine.

13 Q. Who else was in the car other than yourself  
14 and Professor Dershowitz?

15 A. Jeffrey Epstein and another young girl.

16 Q. How many people participated in the sexual  
17 activity in the car?

18 A. Including myself?

19 Q. Uh-huh.

20 A. Four.

21 Q. Where was everybody in the car?

22 A. Sitting down.

23 Q. Were people -- was this a town car, was  
24 this a limousine?

25 A. Like a long limousine.

1 Q. Where was the car going?

2 A. To Mr. Dershowitz' house.

3 Q. Where was it coming from?

4 A. An airport.

5 Q. When was this?

6 A. I don't know.

7 Q. What's your best recollection?

8 A. It wasn't snowing. It wasn't hot. So I  
9 would like to say -- I'm trying to think of the trees  
10 around, but I don't know, maybe spring.

11 Q. Why were you going to Professor Dershowitz'  
12 house?

13 A. Jeffrey and him were doing some business.  
14 They were doing something at his house. Nothing sexual  
15 happened at his house.

16 Q. Did you go in Professor Dershowitz' house?

17 A. Yes, I did.

18 Q. How long were you there?

19 A. Not even twenty minutes, half an hour.

20 Q. What did you do while you were in the  
21 house?

22 A. I sat in, I don't know, a foyer with  
23 another girl and Jeffrey and Dershowitz went to a  
24 different part of the house. There was a desk there and  
25 we just sat, not sat, stood in the foyer.

1 Q. Who was this other girl?

2 A. I don't know who she is.

3 Q. Had you ever met her before?

4 A. No.

5 Q. When you were coming from the airport had  
6 you flown in?

7 A. Yes, me and Jeffrey and the girl had flown  
8 in, Dershowitz had not.

9 Q. How did he get into the limousine?

10 MS. MCCAWLEY: Objection.

11 SPECIAL MASTER: You can answer.

12 BY MS. BORJA:

13 Q. Where did he get into the limousine?

14 A. At the airport.

15 Q. He was not on a flight with Mr. Epstein?

16 A. Not on this occasion.

17 Q. Did you tell anybody about this incident in  
18 the car?

19 A. Like anybody that I know personally?

20 Q. Anybody in the world?

21 MS. MCCAWLEY: Objection to the extent you  
22 relayed something to your lawyer. You can say  
23 that you told your lawyers but you can't discuss  
24 what you said.

25 SPECIAL MASTER: Other than --

1 A. No, I told my lawyers.

2 Q. Did you tell anybody about it closer in  
3 time to the event?

4 A. Like my boyfriend or something like that,  
5 no.

6 Q. After you left Professor Dershowitz's house  
7 where did you go?

8 A. Back to the airport.

9 Q. Where did you fly in from?

10 A. I believe it was New York.

11 Q. When you went back to the airport where did  
12 you go?

13 A. I believe, see, that's the hard thing. I  
14 want to say either New York or Palm Beach. I'm no 100  
15 percent sure.

16 Q. So I understand the time frame, did you fly  
17 in on a private jet or commercial?

18 A. Private.

19 Q. You flew out again on private?

20 A. Yes.

21 Q. So the time frame is that you and Jeffrey  
22 were on the plane?

23 MS. MCCAWLEY: Objection.

24 A. Yes.

25 MS. MCCAWLEY: Objection, mischaracterizes

1 the testimony. Go ahead.

2 A. Yes, me and Jeffrey were on the plane  
3 together.

4 Q. And the girl was on the plane?

5 A. Yes.

6 Q. Anybody else?

7 A. The pilots.

8 Q. So the three of you took the flight,  
9 correct?

10 A. Yes.

11 Q. And you flew into an airport in  
12 Massachusetts?

13 A. Yes.

14 Q. Then you took a limousine to the  
15 Professor's house and you were there for about ten  
16 minutes, is that right?

17 MS. MCCAWLEY: Objection. Go ahead.

18 A. About 20, 25 minutes. I didn't look at my  
19 watch.

20 Q. A very brief period of time?

21 A. Very brief.

22 Q. And then you went back to the airport and  
23 you flew out?

24 A. Yes.

25 Q. And you flew back either to New York or to

1 Palm Beach?

2 A. It could have yeah, it could have been  
3 either-or, I'm not too sure.

4 Q. But one or the other?

5 A. Yes.

6 Q. When you flew back out was anybody else on  
7 the plane other than yourself, Jeffrey, and this girl?

8 A. Actually the girl stayed behind, it was  
9 just Jeffrey and I that went back.

10 Q. Did the girl leave in the limousine with  
11 you and Jeffrey back to the airport?

12 A. No.

13 Q. She was left at Professor Dershowitz's  
14 house?

15 A. She stayed there.

16 Q. Do you know why she was staying there?

17 A. I don't ask questions.

18 Q. Did you talk to her when you were in the  
19 foyer with her?

20 A. Like I said, we basically just have not  
21 real conversations, not girlfriends sitting down talking  
22 to each other just, I don't know, brief conversation.

23 Q. Did Mr. Epstein arrange for the limousine  
24 or did somebody else?

25 A. Maybe one of his assistants. Jeffrey



1 rarely arranged everything himself, usually had somebody  
2 else do it for him.

3 Q. And was there anybody else in Professor  
4 Dershowitz' house other than the people that you've  
5 mentioned, Jeffrey, the girl, and yourself?

6 A. I didn't see anybody.

7 Q. Was this in the morning, at night, what  
8 time was this?

9 A. After noonish, like after the noon period.  
10 It wasn't dark.

11 Q. Did you have anything to eat for lunch?

12 A. Not that I remember. I mean, I'm sure we  
13 did. We didn't go out to lunch. We didn't stop at any  
14 restaurant or anything like that.

15 Q. Other than Professor Dershowitz' house did  
16 you stop anywhere during this trip?

17 A. No.

18 Q. Was this during a weekday or a weekend?

19 A. No idea.

20 Q. Were you able to see the driver while you  
21 were in the car?

22 A. No, there was a black, like a window.

23 Q. Was it closed the entire time?

24 A. That I can remember, yes.

25 Q. Did you ever fly commercially to any of the

1 locations when you claim you were sexually trafficked to  
2 Professor Dershowitz?

3 A. I did used to have to fly commercially to  
4 go service the men that Jeffrey sent me to, but I don't  
5 remember having to fly commercially for Alan Dershowitz.

6 Q. Now, other than your conversation with Ms.  
7 Churcher before the first Daily Mail article came out,  
8 did you talk to her again about where you mentioned Alan  
9 Dershowitz?

10 A. Before I spoke to her?

11 Q. No, since that article came out?

12 A. Have I talked to her again about Alan  
13 Dershowitz?

14 Q. Correct?

15 MS. MCCAWLEY: I object to this line of  
16 questioning. I think I have a standing objection,  
17 just to make that clear.

18 A. Yes, I think we actually have. I think she  
19 read the recent, well, not so recent, about a year ago  
20 the statements made in the press and she called me up and  
21 I told her that I was not allowed to discuss it.

22 Q. What did she say to you?

23 A. She was just asking me about the ongoing  
24 proceedings and I said I don't think I'm able to comment.  
25 I don't think it's a wise thing to do, especially her

1 being a journalist.

2 Q. Have you ever e-mailed with Sharon  
3 Churcher?

4 A. Yes, I have.

5 Q. How many times?

6 A. I don't know, a lot.

7 Q. What does a lot mean to you?

8 A. Over twenty.

9 Q. When was the last time you e-mailed with  
10 her?

11 A. Probably in 2015.

12 Q. Do you know approximately how many times  
13 you e-mailed with her in 2015?

14 A. Maybe about five.

15 Q. Before 2015 was there a long gap in your  
16 e-mail?

17 A. Yes, there was a long gap.

18 Q. Did you e-mail with her around the time  
19 leading up to the meeting that you had before the first  
20 Daily Mail article?

21 A. I think that was actually phone  
22 conversations, not e-mails.

23 Q. After you met with her the first time did  
24 you then e-mail with her?

25 A. Yes, then we e-mailed.

1 Q. About how many times, putting aside the  
2 five or so in 2015?

3 A. About anywhere between ten to fifteen. I'm  
4 not too sure of the exact number but --

5 Q. Were you e-mailing with her while you were  
6 living in Australia?

7 A. Uh-huh.

8 Q. And were you e-mailings with her while you  
9 were living back in the United States?

10 A. Uh-huh.

11 Q. Yes?

12 A. Yes, sorry.

13 Q. Have you e-mailed with any other press  
14 regarding Alan Dershowitz?

15 A. No.

16 Q. Actually did your e-mails with Ms. Churcher  
17 refer to Alan Dershowitz?

18 A. No.

19 Q. Did your e-mails with Ms. Churcher  
20 specifically identify any alleged sexual abuser other  
21 than Mr. Epstein?

22 A. Prince Andrew, that's it.

23 Q. Had you had any e-mails with anybody about  
24 Alan Dershowitz?

25 MS. MCCAWLEY: I'm going to object to the

1 extent that this reveals anything that you have  
2 e-mailed with your lawyer. You don't have to  
3 testify to that.

4 A. Besides with my lawyers, no.

5 Q. Did you ever e-mail Rebecca about Professor  
6 Dershowitz?

7 A. I am pretty sure we had phone conversation,  
8 actually no, face to face conversations about him and  
9 maybe some comments over the phone, but I do not recall  
10 sending her any e-mails regarding Alan Dershowitz except  
11 for the text messages I sent to her after I learned she  
12 was talking to him and I said, I don't believe you're  
13 talking to a pedophile. Other than that, no.

14 Q. How many text messages did you send to her?

15 A. What, from the time I've known her?

16 Q. No, regarding Professor Dershowitz?

17 A. Max, well, I mean the first one I sent to  
18 her was about him and then, you know, the other ones were  
19 quite simple like, you know, you've got two precious  
20 daughters, you know. I don't know if he was actually  
21 named in any of those to be honest. I think I referred  
22 to him as the pedophile or a pedophile, but I mean I  
23 would say max three.

24 Q. Have you left her voice mail messages about  
25 Professor Dershowitz?

1           A.     I have called her. Well, first she  
2 answered and then I said, please tell me it's not true  
3 that you're actually doing this and then she hung up and,  
4 yes, I have called her back and I have left her voice  
5 mails, nothing abusive just, Becky, what are you doing  
6 you know.

7           Q.     You know what?

8           A.     What are you doing, you know, like that's  
9 what I said to her. That's how I talk, our lingo. Not  
10 you know what, like anything, but what are you doing, you  
11 know.

12          Q.     Did you give her any context or is that the  
13 entire message that you would have left?

14          A.     I don't know the entire message I would  
15 have left, but like I said, it would not be abusive.

16          Q.     Now, I think that you mentioned in, was it  
17 Palm Beach, Juan Alessi?

18          A.     Yes.

19          Q.     He was on the house staff?

20          A.     Yes, he was a butler.

21          Q.     What was the name of the fellow?

22          A.     Joe Joe.

23          Q.     What's Joe Joe's last name?

24          A.     I have no idea.

25          Q.     Have you ever met Alfredo Rodriguez?

1           A.     I don't know. I mean, you have to  
2 understand there's lots of house staff at all of his  
3 residences. It's possible I did come across them, but  
4 I'm not too sure.

5           Q.     But you don't have any specific  
6 recollection ever meeting him, do you?

7           MS. MCCAWLEY: Objection.

8           A.     No.

9           SPECIAL MASTER: You can answer. You  
10 answered. Go ahead.

11          THE WITNESS: Sorry.

12          SPECIAL MASTER: It's all right.

13 BY MS. BORJA:

14          Q.     What did you do with the your e-mails with  
15 Ms. Churcher?

16          A.     What do you mean, what did I do with them?  
17 Did I print them out?

18          Q.     Did you keep them in your inbox, your sent  
19 box?

20          A.     Yes, they would be in my in box. I mean,  
21 after so long, I mean, I had to not just delete hers, but  
22 delete a lot of files from my inbox, it was getting too  
23 full. I still have e-mails of hers in my inbox.

24          Q.     Do you still have the text messages you  
25 sent to Rebecca?

1 A. No, I've gone through phones and that's not  
2 because of on purpose. My kids literally break every  
3 phone that I get.

4 Q. So when was the last time that you texted  
5 Rebecca?

6 A. When I found out that she was talking to  
7 Dershowitz.

8 Q. What's that time frame?

9 A. I have no idea. I think it was June of  
10 last year, June 2015, but that's not what I messaged her.  
11 I only messaged her recently when I found out, which I  
12 think was during Dershowitz' first deposition when he  
13 said that he had been talking about Rebecca.

14 Q. And then you've switched phones since then?

15 A. Yes, I have a new phone, but I have those  
16 messages that I sent to her on my new phone.

17 (Thereupon, VR Defendant's Exhibit No. 6,  
18 was Marked for Identification.)

19 BY MS. BORJA:

20 Q. Ms. Giuffre, I've handed you a document  
21 that's been marked VR Exhibit 6, which is a 13 page  
22 document copy of an article from Radar Online. Do you  
23 have that?

24 A. Yes, I do.

25 Q. Is this the Radar Online article that you



1 referred to earlier in your testimony today with the  
2 ripped out pages from your booklet?

3 A. Yes.

4 Q. Do you have any understanding of how Radar  
5 Online got these pages?

6 MS. MCCAWLEY: Objection.

7 A. No, not at all.

8 Q. After these were public on Radar Online did  
9 you contact that publication?

10 A. No. Maybe I should have, but I didn't  
11 think of it.

12 Q. Are the excerpts here things that you wrote  
13 in your handwriting?

14 A. Yes.

15 Q. These are the pages that you gave Ms.  
16 Churcher, correct?

17 A. Uh-huh, yes.

18 Q. Are there any pages that you gave Ms.  
19 Churcher that are not reflected in the article?

20 A. I mean, can you give me a minute to look at  
21 all of them?

22 Q. You don't have to read the comments. I'm  
23 not going to ask you about them.

24 A. It looks like there's a little bit of  
25 excerpts taken out of the pages I gave to her.

1 Q. Were there any additional pages that you  
2 gave to her that's not printed into this article?

3 A. Yes, that's what I'm saying. I mean, from  
4 what I can tell it's like they've taken excerpts out of  
5 the pages I gave to her and kind of pieced them together;  
6 but if you read them closely it doesn't look like every  
7 single one matches the next.

8 Q. What was your purpose in writing those  
9 pages?

10 MS. MCCAWLEY: Objection. You can answer.

11 A. You know, at that time I was very let down  
12 by the United States government for not prosecuting  
13 Jeffrey Epstein in what I think that he deserved and what  
14 all his victims deserved to get from what he's done to  
15 us. So to me this was my way of telling a small piece of  
16 my story to see, you know, what we could do to re-open  
17 the case to get more knowledge about Jeffrey Epstein and  
18 what he's made, not just me, but a lot of other victims  
19 have to go through.

20 Q. About how much time had elapsed between the  
21 time when you met Prince Andrew and the time that you  
22 wrote the booklet?

23 A. Oh, many years, many years. All three of  
24 my kids had been born by then so we're talking, sorry, I  
25 am horrible at math, roughly about ten years.

1 Q. In terms of your meeting with Prince Andrew  
2 when you went to Club Tramp, the excerpts in here said  
3 the two of you had grabbed a couple of alcoholic  
4 cocktails. Do you see that?

5 A. Is that in the first page?

6 Q. This is at page 3 of 13. The beginning of  
7 the text gets blocked out by the advertisement, but it  
8 refers generally to Club Tramp where you had grabbed them  
9 both an alcoholic cocktail, she wrote in the diary  
10 obtained by Radar?

11 A. I do read that.

12 Q. How long were you at the bar with Prince  
13 Andrew or at Club Tramp I should say?

14 A. I would say over an hour but not two.

15 Q. Did you have more than one drink?

16 A. I believe I had two drinks. I'm not too  
17 sure if -- I assumed that Andrew was drinking alcohol as  
18 well, but I'm not too sure if it was. He ordered the  
19 drinks, and he ordered alcohol for me. So I only assumed  
20 that he was drinking it as well, but yes.

21 Q. So he went up to the bar and ordered them  
22 and brought them back?

23 A. Yes.

24 Q. And you can't say what he ordered at the  
25 bar?

1           A.     I know they were both clear drinks. I  
2 don't know exactly what mine was, but it was clear and  
3 was alcohol. I didn't have a sip of his so I don't know  
4 what it was.

5           Q.     Did you take Ecstasy at this club?

6           A.     No.

7           Q.     And on two drinks -- did Prince Andrew have  
8 more than two drinks?

9           A.     I know I had two drinks. I don't know how  
10 many he had. I'm not too sure.

11          Q.     Okay. After these were public did you ever  
12 ask for these pages back?

13          A.     As far as I knew they were properties of  
14 Sharons. I think I had a rough conversation with her  
15 about it because I didn't know that these were going to  
16 get public at any time. These were more from between me  
17 and her. It really shocked me to see these in the  
18 public.

19                    So I honestly didn't think there was  
20 anything that you could do about it, it was already out  
21 there. Thinking about it today, you're right, I should  
22 have gone to Radar Online and found out why and who and  
23 how.

24          Q.     I don't mean to mislead you, Sharon's name  
25 is at the end of the article?

1           A.       Well, then -- I mean, that's obvious  
2 without even reading that. I mean, she's the only one  
3 who had it. So she's the only one who could have given  
4 it to them.

5           Q.       Why did you think it was her property?

6           A.       Because everything that I had given her was  
7 her property.

8           Q.       Why is that?

9                   MS. MCCAWLEY: Objection, asked and  
10 answered.

11          A.       I mean, well --

12                   SPECIAL MASTER: You can answer.

13                   MS. MCCAWLEY: It's fine, if you know. Say  
14 what you know.

15          A.       Because everything that -- she told me  
16 everything that I gave her. So the story was her  
17 property, the papers that I gave her were her property.  
18 The photographs that they took of me like on the beach  
19 and I think there was a pictures of me on the bridge.  
20 Maybe there's a couple of other pictures, those are her  
21 property as well.

22          Q.       Was that spelled out in the contract?

23          A.       I don't know. It probably was. It was a  
24 long contract. I didn't have lawyers read it over for me  
25 so I'm not too sure.

1 Q. Did you keep a copy of that?

2 A. No.

3 Q. What did you do with it?

4 A. When I moved from Australia I had a bunch  
5 of paperwork I just kind of threw out, I didn't bring  
6 everything with me.

7 Q. Why did you choose to move back to the  
8 United States at that time?

9 A. I mean, there's a couple good reasons why I  
10 moved back. You know, first and foremost I haven't seen  
11 my family in a long time; and secondly, I wanted to see  
12 something happen with the -- I was trying to join the  
13 CVRA case so I was hoping by moving back I would see that  
14 progress.

15 Q. What's the date that you moved back?

16 A. As far as the picture that you just showed  
17 me of the house that's November. I think it only took me  
18 about two weeks -- actually I can tell you the exact  
19 date, it was on my anniversary, October 16th, 2013.

20 MS. MCCAWLEY: Do you need a break or are  
21 you okay?

22 THE WITNESS: I'm okay.

23 BY MS. BORJA:

24 Q. Other than the meeting that you talked  
25 about with the FBI in 2011 shortly after the first Daily

1 Mail article came out, have you talked to any other law  
2 enforcement about Jeffrey Epstein?

3 MS. MCCAWLEY: I'm going to object to the  
4 extent that it's an investigational privilege. If  
5 there's an ongoing investigation to extent it was  
6 the FBI or something that happened previously you  
7 can discuss that.

8 SPECIAL MASTER: You can answer.

9 A. Okay. Honestly I'm trying to think, FBI --  
10 I'm trying to remember when I talked to Maria Vilafana.  
11 I'm just going to say I'm not to sure. I don't want to  
12 answer incorrectly.

13 Q. Have you ever given an affidavit to law  
14 enforcement?

15 A. An affidavit?

16 Q. Something that you signed?

17 A. Yes, I know what it is. I'm just trying to  
18 think. I'm not questioning you, but would the FBI have  
19 an affidavit? I don't know. I would have signed  
20 something for them.

21 MS. MCCAWLEY: Just answer what you know.

22 BY MS. BORJA:

23 Q. When was the first time that you told Brad  
24 Edwards that you had been sexually abused by Professor  
25 Dershowitz?

1 MS. MCCAWLEY: And again, no  
2 attorney/client privileged discussions, you can  
3 give the date.

4 A. I don't know the date.

5 MS. MCCAWLEY: Or time frame.

6 A. It would have been, I think, on -- this is  
7 not attorney/client privilege?

8 SPECIAL MASTER: Just the time frame.

9 MS. MCCAWLEY: As long as you don't  
10 describe it. Just the time frame.

11 SPECIAL MASTER: You can't describe the  
12 conversation but you can describe the time frame.

13 A. That's a difficult answer because there --

14 MS. MCCAWLEY: I don't want you to go into  
15 considerations. Think about it in your mind. So  
16 don't talk about what you were discussing, but if  
17 you can come up with a date in your mind or a time  
18 period then you can say that.

19 A. Let's just say the first time I mentioned  
20 Alan Dershowitz I think was in 2011.

21 Q. Did you say -- when was the first time, not  
22 that you mentioned Alan Dershowitz but that you  
23 identified him as a sexual abuser?

24 A. The first time I went into detail about it  
25 would have been I think in 2013, maybe early 2014.



1 Q. Were you living in the U.S.?

2 A. Yes. Don't quote me 100 percent, it could  
3 have been before then. I'm just trying to remember back.

4 Q. When was the first time, just the date,  
5 that you ever told Paul Cassell that you were sexually  
6 abused by Alan Dershowitz?

7 SPECIAL MASTER: Just the date.

8 A. It would have early 2013, 2014, same as  
9 Brad.

10 Q. Now, in the document that we previously  
11 marked, the transcript of your conversation with Mr.  
12 Scarola, I'm not going to ask you to read it, I'm just  
13 asking you generally, you had said that Brad Edwards had  
14 contacted you because he was being sued -- he was in a  
15 lawsuit with Mr. Epstein. Do you recall that?

16 MS. MCCAWLEY: Objection. You can answer.  
17 Sorry.

18 THE WITNESS: You're confusing me.

19 MS. MCCAWLEY: It's part of it. I'm sorry.

20 A. Yes, I do remember that.

21 Q. Do you know when that was?

22 A. Possibly April 7, 2011. I don't know if  
23 that's the same conversation or it was before that or  
24 after that, but I believe the first time me and Brad ever  
25 talked was around that date.

1 Q. He called you, right? You didn't call him  
2 out of the blue, he called you out of the blue?

3 A. No, I might have called him, I think. I  
4 might have. I can't honestly remember, but Sharon  
5 Churcher knew how much I wanted to see this case open up  
6 and get resolved which is why I talked to the FBI. So I  
7 can't remember if she introduced me to Brad. I think  
8 that's how that went.

9 Q. Did Sharon Churcher know about Mr. Edwards'  
10 litigation with Mr. Epstein?

11 MS. MCCAWLEY: Objection.

12 SPECIAL MASTER: You can answer if you  
13 know.

14 MS. MCCAWLEY: You can answer.

15 A. I don't know what she knew about him, but  
16 she told me he was a really good lawyer who was doing pro  
17 bono work for other victims of Epstein and that if I  
18 wanted talk to somebody, he would be a good person to  
19 talk to.

20 Q. That was in the --

21 A. Same time period.

22 Q. 2011?

23 A. Yes.

24 Q. Okay. So in 2011 he was going to help you?

25 A. At that stage we hadn't established

1 anything. It was just kind of like, hi, who are you,  
2 this is me, who are you, so on so forth.

3 Q. You wanted to identify yourself as a victim  
4 of Jeffrey Epstein?

5 A. Absolutely.

6 MS. MCCAWLEY: Do you need a break?

7 THE WITNESS: No.

8 BY MS. BORJA:

9 Q. Now, in your -- that transcript towards the  
10 end Mr. Scarola asks you certain names?

11 SPECIAL MASTER: What page are you  
12 referring to?

13 BY MS. BORJA:

14 Q. At page 22 of 23?

15 A. Yes.

16 Q. If you go down about halfway, two-thirds of  
17 the way down the page, it says -- so I'll just name a  
18 name and you tell me yes if they told the truth. I think  
19 they have relevant information, or no, I don't think they  
20 would or I don't know whether they would or not. Okay,  
21 you understand?

22 MS. MCCAWLEY: I don't see where you are.

23 MR. SCAROLA: Just below the middle of the  
24 page.

25 MS. MCCAWLEY: Here we go. I see it, I'm

1           sorry.

2 BY MS. BORJA:

3           Q.     You see where I am reading?

4           A.     Uh-huh.

5           Q.     And then you say yes, and then Mr. Scarola  
6 says, okay, Les Wexner, do you see that?

7           A.     Yes.

8           Q.     And you said I think he has relevant  
9 information, but I don't think he'll tell you the truth.  
10 Do you see that?

11          A.     Yes.

12          Q.     Why did you think he wouldn't tell the  
13 truth?

14          A.     Because he did things that were wrong.

15          Q.     What do you mean by that?

16          A.     He participated in sex with minors.

17          Q.     Did you tell Rebecca that Les Wexner had  
18 participated in sex with minors?

19          A.     Yes, I did.

20          Q.     Did you talk to Rebecca about efforts to  
21 obtain any sort of the remedy or relief or damages or  
22 other way to bring Mr. Wexner to justice?

23          A.     I did talk to her about the ongoing  
24 proceedings that I wanted to bring against Mr. Wexner.

25          Q.     What did you tell her?

1           A.     I told her the details about what happened  
2 between Wexner and I and, you know, I said I hope we can  
3 get him in some way. I mean, I've heard the statements  
4 about the 50 billion or whatever that was, completely  
5 incorrect and I honestly do not know where she pulled  
6 that rabbit out of, that's absurd. I don't know her to  
7 be an untruthful person, but what her statements were are  
8 a thousand percentage untrue.

9           MS. BORJA: Can you read back the answer?

10           I can read your notes.

11 BY MS. BORJA:

12           Q.     When you said I hope we can get him in some  
13 way, what did you mean by that?

14           A.     I hoped that my lawyers would prevail in  
15 fighting him in court, you know. I don't know what I'm  
16 allowed to talk about.

17           MS. MCCAWLEY: You're not allowed to  
18 discuss anything that we've talked about in a  
19 confidential nature.

20           A.     There was never any monetary value ever  
21 discussed.

22           Q.     So you wanted to go off Wexner?

23           SPECIAL MASTER: Outside of --

24           MS. MCCAWLEY: If you're talking about the  
25 conversation with Rebecca.

1                   SPECIAL MASTER: You're excluding  
2                   discussions with your lawyers.

3                   MS. MCCAWLEY: If you're talking about the  
4                   conversations with Rebecca that time but don't  
5                   talk about anything you talked to us about.

6                   A.        No, with Rebecca there was no monetary  
7                   value ever discussed.

8                   Q.        But you said you wanted to go after him in  
9                   court?

10                  A.        Yes.

11                  Q.        What did you want to have happen?

12                  A.        I wanted to see him come forward. I wanted  
13                  justice to happen.

14                  Q.        What does that mean?

15                  A.        I wanted him to own up for his wrongs.

16                  Q.        Did you go to the government and say  
17                  prosecute him?

18                  MS. MCCAWLEY: Objection. To the extent  
19                  that it reveals any current ongoing investigation  
20                  you can't discuss that.

21                  SPECIAL MASTER: Anything that you had  
22                  discussions with your lawyers and they provided on  
23                  your behalf, that's not to be discussed. Do you  
24                  understand that.

25                  A.        Did I tell Rebecca that I'm going to the

1 government?

2 SPECIAL MASTER: We're talking about  
3 Rebecca.

4 A. No, I never went to Rebecca and told her  
5 we're going to the government. What did the government  
6 have to do with this anyways?

7 Q. Did you want to have Mr. Wexner or anybody  
8 else pay amounts to your charity?

9 A. No.

10 Q. Why not? You didn't want any money for  
11 your charity?

12 A. Of course I want money for my charity. I'd  
13 love to see -- my charity is my vision, to be able to  
14 help other victims out there suffering through what I  
15 suffered through. Of course that would be a dream come  
16 true, but did I say that money is going to be put into  
17 that by some unimaginable source, no.

18 Q. Has the charity distributed any funds to  
19 victims?

20 A. Not as yet. We haven't been able to go out  
21 and publish, not publish, what's the word I'm looking  
22 for? We haven't been able to make it proactive the way I  
23 want to make it proactive like go on TV and talk about  
24 it. You know what I mean? It's there, it's set up, it's  
25 wonderful. It's got a list of numbers and names of

1 places you can to go to for help.

2 Right now it's just a map of every place in  
3 the United States that I've called personally to be able  
4 to get out of the situation that you're in if you're a  
5 victim of abuse or sexually trafficked. There's no money  
6 to give to victims.

7 Q. There's no funds currently in the charity?

8 A. No, besides what keeps it afloat in the  
9 bank, which is probably \$150 or something.

10 Q. Are the officers paid?

11 A. The who?

12 Q. The officers of the charity?

13 A. No, no one is paid.

14 Q. Has anybody applied to the charity or  
15 funds?

16 A. No, like has a victim called up and said,  
17 can we get some money? Is that what you're asking? No.

18 Q. That's one way?

19 A. No.

20 Q. Nobody has contacted the charity on line?

21 A. No, we have had nice people call up and  
22 tell us about their story and, you know, thank me for  
23 coming forward and being brave. We have had that, but we  
24 have had nobody ask for money, we've just had nice fan  
25 mail.



1                   SPECIAL MASTER: Now is good time to take a  
2 five-minute break.

3                   MS. MCCAWLEY: Sure, I was going to let you  
4 know, too, in the effort to conserve time I did  
5 get lunch brought in for everybody. I'm not sure  
6 how many things are open since this is a Saturday.  
7 I don't know when you're hungry. It's your  
8 deposition, unless you're ready to eat, but  
9 whenever that is, I think she set it up maybe in  
10 one of the rooms so we can sign them out.

11                   SPECIAL MASTER: Thank you.

12                   THE VIDEOGRAPHER: Going off --

13                   SPECIAL MASTER: The witness is excused.  
14 Go ahead and step out.

15                   MS. MCCAWLEY: Meridith, why don't you take  
16 her.

17                   (Witness leaves the conference room.)

18                   SPECIAL MASTER: Housekeeping. You wanted  
19 to put your objection on the record outside of the  
20 witness. Go ahead. Now would be the appropriate  
21 time.

22                   MS. BORJA: The witness has testified that  
23 she's afraid for her life. Her counsel has  
24 instructed her not to provide names because of  
25 fears of physical retribution. At the same time

1 the witness has posted on Facebook in a way that's  
2 publically available not only the photo of her  
3 house, the exact street address. She posted her  
4 children up on Facebook.

5 I didn't inject those children into this  
6 case, I don't plan to, but there's no basis when a  
7 witness has made a Facebook page profile available  
8 to the world to say that I'm supposed to collect  
9 copies of something that's on the Internet and  
10 seal them. That's not my obligation and I think  
11 that is inappropriate, and this is something that  
12 the witness has put out there that is inconsistent  
13 with the testimony.

14 MS. MCCAWLEY: I want to make clear, the  
15 date on that is November of 2013. She has  
16 received threats to her safety since that date.  
17 So it is inappropriate to put her address on the  
18 record or anything with respect to her children.

19 MS. BORJA: I did not read her address into  
20 the record.

21 MR. SCAROLA: May I make a suggestion? I  
22 understand the point that is attempted to be made  
23 with regard to the relevancy of these matters, and  
24 the relevancy is the suggestion that posting  
25 pictures of her children and her address would

1           tend to contradict assertions that she is in fear.

2           Well, to the extent that that is a relevant  
3           argument it is established by reference to the  
4           fact that pictures of her children and her address  
5           were posted on the Internet in a specific date,  
6           there's no reason for either the pictures  
7           themselves or the address to be part of any  
8           record.

9           So we would join in the objection that as a  
10          matter of privacy those things be excluded from  
11          the public record, although referenced to the fact  
12          of the posting is fair game from our perspective.

13          MS. BORJA: Then I'm going to go in, I'm  
14          going to need to re-examine the witness because I  
15          avoided any mention of her children based on her  
16          counsel's objections, and I will ask her on the  
17          record that she has posted pictures of her own  
18          children. I didn't ask her that.

19          MR. SCAROLA: We'll stipulate to the fact I  
20          think that she said those are her children. We'll  
21          stipulate to the fact that there are photographs  
22          of her children.

23          MS. BORJA: That she posted.

24          MR. SCAROLA: That she posted.

25          MS. MCCAWLEY: On that date.

1 MR. SCAROLA: On that date in 2013 and that  
2 her address appears on the document posted in  
3 2013.

4 SPECIAL MASTER: Does that stipulation  
5 satisfy you?

6 MR. SCOTT: We'll consider it over lunch.  
7 We'll talk.

8 MR. SCAROLA: Over lunch. When we take the  
9 break we'll talk to the client.

10 SPECIAL MASTER: I'm not excluding the  
11 documents, should be aware. What I want to do,  
12 though, is take extra precaution to protect the  
13 document from being disclosed in any form, which  
14 is why we've collected all of the copies. I will  
15 put you in charge of them, Sigrid, and what we'll  
16 do -- and with respect to your relevancy argument  
17 or any other argument that you wish to make on  
18 that it appears it's going to go in front of Judge  
19 Lynch. That document is going to be available to  
20 you. If he's going to treat it in the manner in  
21 which he treats it and gives it whatever weight.  
22 I'm not excluding that, but what I do want to do  
23 is take the extra precaution of protecting the  
24 witnesses' privacy.

25 MS. BORJA: That's fine, but to be clear my

1 objection is not relevance. My basis for arguing  
2 this is not relevancy. It goes to the credibility  
3 of the witness.

4 SPECIAL MASTER: I'm aware. I will share  
5 this, if you need to ask additional questions  
6 beyond the stipulation, then I think we can go  
7 down that road and let you ask the questions and  
8 we'll see if there's an objection with respect to  
9 those, but I'm going to give you that opportunity  
10 if you choose to take it. Fair enough?

11 MS. BORJA: Yes.

12 SPECIAL MASTER: Let's break for five  
13 minutes. Let's be back here, it is, by my watch  
14 it is now what, 20 to 1. Let's be back here at  
15 quarter to one.

16 MS. MCCAWLEY: Can we have a time check on  
17 how much time we've spent?

18 THE VIDEOGRAPHER: Two hours and 59 minutes  
19 exactly.

20 SPECIAL MASTER: It's 20 to 1. Let's be  
21 back ready to begin the deposition again at 1:00  
22 o'clock.

23 (Lunch recess was taken.)

24 THE VIDEOGRAPHER: We are now back on video  
25 record, 1:16 p.m. disk number 3.

1 BY MS. BORJA:

2 Q. Mr. Giuffre, we were talking earlier today  
3 about that joinder motion and I had given you a copy of  
4 this document, do you still have to in front of you, Jane  
5 Doe #3 and Jane Doe #4 corrected motion?

6 A. This one?

7 MS. MCCAWLEY: Yes.

8 A. Yes.

9 Q. Turn, please, to page 4 of that document.

10 MS. MCCAWLEY: Hang on one second. I don't  
11 think I have a copy here of this for some reason.  
12 I know you gave me one. I got it. I'm sorry.  
13 Thank you.

14 BY MS. BORJA:

15 Q. In the first full paragraph if you go six  
16 lines down. Let's start five lines down where it says,  
17 the sentence begins, in addition to. Do you see where  
18 I'm reading?

19 A. Yes.

20 Q. In addition to being a participate in the  
21 abuse of Jane Doe #3 and other minors Dershowitz was an  
22 eye witness to the sexual abuse of many other minors by  
23 Epstein and several of Epstein's co-conspirators. Do you  
24 see that?

25 A. Yes.

1 Q. Now, where it says participant in the abuse  
2 of Jane Doe #3, you talked about your abuse and other  
3 minors?

4 A. I'm sorry, I don't see -- yes, participant,  
5 yes.

6 Q. Participant in the abuse of other minors?

7 A. Yes.

8 Q. Can you identify any of those minors?

9 A. Specifically talking right now I'm speaking  
10 about the girl on the airplane and in the limousine.

11 Q. How do you know the age of the girl on the  
12 airplane?

13 A. Like I said before they looked young but  
14 it's hard to depict exactly what age they are.

15 Q. It's possible that neither one of them was  
16 a minor?

17 A. It's possible that they were, yes, not a  
18 minor, but from what they looked like to me they did look  
19 young. Like I said, I can't tell you their ages because  
20 I didn't talk to them and ask them their ages.

21 Q. Then it says Dershowitz was an eye witness  
22 to the sexual abuse of many other minors of Epstein and  
23 several of Epstein's co-conspirators, do you see that?

24 A. Yes.

25 Q. Is that something that you personally know?

1           A.       Yes.   Dershowitz was around a lot and  
2 Epstein constantly had minors around with him.  So to say  
3 that he personally knew about the abuse happening with  
4 the other minors, I mean, even before Dershowitz and I  
5 were personally together, he walked in on -- one occasion  
6 in New York he walked in on me providing oral sex to  
7 Jeffrey Epstein and, I mean, I thought that was a very  
8 awkward situation, somebody just knocking on the door  
9 walking in continuing to have a conversation while he's  
10 being serviced.  So and then as well, you know, there's  
11 -- I mean, charades of, tons of young girls constantly  
12 around for the only sole purpose of having sex with those  
13 minors.

14           Q.       How many times would anybody have to visit  
15 an Epstein property to be an eye witness to the sexual  
16 abuse of many of the minors in your opinion?

17           A.       I'm sorry, can you rephrase?  I just don't  
18 understand what you mean.

19           Q.       You say that Dershowitz was an eye witness?

20           A.       Yes.

21           Q.       But you never actually saw him as an eye  
22 witness to the sexual abuse of many of the minors; is  
23 that correct?

24                   MS. MCCAWLEY:  Objection.

25           A.       Yes, I did see him as an eye witness



1 obviously on the plane and in the limousine.

2 Q. But we don't know those were minors one way  
3 or the other, right?

4 A. Right.

5 Q. That's your assumption, correct?

6 A. Yes.

7 MS. MCCAWLEY: Objection.

8 Q. And you're speculating, right?

9 MS. MCCAWLEY: Objection.

10 SPECIAL MASTER: You can answer.

11 MS. MCCAWLEY: Sorry.

12 A. Yes. I mean I --

13 MR. SCAROLA: Excuse me, I don't believe  
14 the witness finished her response. You  
15 interrupted her as she was still speaking.

16 BY MS. BORJA:

17 Q. So let's leave those two instances aside?

18 MR. SCAROLA: May we ask her to please to  
19 finish her response.

20 MS. MCCAWLEY: You can finish your answer  
21 if you had anything else to say.

22 SPECIAL MASTER: I thought you had  
23 finished. Do you have anything else to add?

24 A. They were young girls and there was  
25 constantly young girls that I know were minors around, I

1 mean, only because they were too, way too young to even  
2 look like an 18 year old plus.

3 Q. Okay. I'm not asking about other girls  
4 being around. I'm asking about Professor Dershowitz  
5 being an eye witness to sexual abuse with other minors.  
6 I'm asking you from the basis of your testimony that you  
7 know that he saw sexual abuse of other minors. What's  
8 the basis for your testimony?

9 MS. MCCAWLEY: Objection.

10 SPECIAL MASTER: You can answer.

11 A. The only thing I can say to that is that  
12 there were minors around and did Dershowitz know that  
13 Jeffrey Epstein was using these minors for sexual  
14 purposes, yes, he did.

15 Q. How do you know that?

16 A. How do I know that Dershowitz knew that?

17 MS. MCCAWLEY: Objection.

18 BY MS. BORJA:

19 Q. Yes, how do you know what he knew?

20 A. How do I know what he knew, because he was  
21 around Jeffrey Epstein so many times that you would have  
22 to be blind to not know what Jeffrey Epstein was doing.

23 Q. So it's your guess as to what Professor  
24 Dershowitz knew or didn't know, right?

25 MS. MCCAWLEY: Objection, argumentative.

1 A. No, it's a fact.

2 Q. Did you see Professor Dershowitz as a  
3 witness to the sexual abuse of anybody you know to have  
4 been a minor? Did you personally witness that?

5 MS. MCCAWLEY: Objection.

6 A. With any other -- I'm sorry, with any other  
7 minors? Did I see him with any other minors, is that  
8 what you're asking me?

9 MS. MCCAWLEY: Objection, asked and  
10 answered.

11 SPECIAL MASTER: You can answer.

12 A. Besides the two girls that I considered to  
13 be very young, but I don't know their ages, no, I have  
14 not seen him personally witness sexual abuse in that  
15 circumstance. Just the sheer fact that the girls were  
16 around and he knew the purpose for the girls being  
17 around.

18 Q. What's the basis for your testimony that he  
19 knew the purpose for the girls being around?

20 MS. MCCAWLEY: Objection. You can answer.

21 SPECIAL MASTER: You can answer.

22 A. Because Jeffrey used these girls -- he  
23 didn't have friends that were 15, 16, 17, 18 just to hang  
24 around with as friends. And like I said, you would have  
25 to be a blind person to not know what he was doing with

1 these girls. I mean, he was arranging massages for other  
2 people that I did not witness myself, for these girls,  
3 and they were minors.

4 So for Dershowitz to be around on so many  
5 occasions and know that there's minors around, I mean,  
6 it's just common logical sense.

7 Q. So you're making an assumption, right?

8 MS. MCCAWLEY: Objection.

9 SPECIAL MASTER: You can answer.

10 A. You can call it an assumption, but like I  
11 said you'd have to be blind to not know what's going on.

12 Q. How many times did somebody to have to come  
13 to an Epstein property for you to have the same  
14 assumption about that person?

15 MS. MCCAWLEY: Objection.

16 SPECIAL MASTER: You can answer.

17 A. I would say the first time they came to  
18 that property there is nude pictures everywhere. These  
19 are salacious acts of girls, young girls doing things to  
20 each other that would be considered child pornography.  
21 If you walked foot into Jeffrey Epstein's house and you  
22 went in there and you continued to be an acquaintance of  
23 his then you would have to know what was going on there.

24 Q. So Donald Trump was in your mind you  
25 believe a witness to the sexual abuse of minors?

1 MS. MCCAWLEY: Let her finish. Objection.

2 That mischaracterizes testimony.

3 THE WITNESS: Thank you.

4 SPECIAL MASTER: You can answer.

5 MS. MCCAWLEY: You can answer.

6 A. I don't think Donald Trump participated in  
7 anything. That would have to be another assumption. I  
8 never saw or witnessed Donald Trump participate in those  
9 acts, but was he in the house of Jeffrey Epstein. I've  
10 heard he has been, but I haven't seen him myself so I  
11 don't know.

12 Q. You've seen Heidi Klum with Jeffrey  
13 Epstein, correct?

14 A. At parties.

15 MS. MCCAWLEY: Objection.

16 BY MS. BORJA:

17 Q. So is it your assumption that she's a  
18 witness to sexual abuse of minors?

19 MS. MCCAWLEY: Objection.

20 SPECIAL MASTER: You can answer.

21 A. I don't know if Heidi Klum was at the house  
22 of Jeffrey Epstein. I know she was at parties with  
23 Jeffrey Epstein. So, no, I can't say she's a witness.

24 Q. Is Bill Clinton a witness to the sexual  
25 abuse of minors?

1 MS. MCCAWLEY: Objection. You can answer.

2 SPECIAL MASTER: You can answer.

3 MS. MCCAWLEY: Just what you know.

4 A. Yes, he would be a witness because he knew  
5 what my purpose there was for Jeffrey and he visited  
6 Jeffrey's island.

7 MS. MCCAWLEY: Shhh please. Let her finish  
8 her answer.

9 A. There's pictures of nude girls all around  
10 the house at all of his houses and it's something that  
11 Jeffrey Epstein wasn't shy about admitting to people.

12 Q. Is Tipper Gore a witness to the sexual  
13 abuse of minors?

14 MS. MCCAWLEY: Objection.

15 SPECIAL MASTER: You can answer.

16 A. Not that I'm aware of. I mean, if you're  
17 going to say why was I there with an older man, then I  
18 guess yes, she would be, but do I believe that she took  
19 presence in anything like that, absolutely not. I can't  
20 say. I'm not on grounds to say that.

21 Q. Some people you'll assume and some people  
22 you won't?

23 MS. MCCAWLEY: Objection.

24 A. Some people I would say are closer to  
25 Jeffrey than others. Did I see Tipper hang around

1 Jeffrey as much as Alan Dershowitz, no, I didn't. But  
2 Alan Dershowitz was around all the time so I would  
3 definitely say he was a witness to it.

4 Q. Is Larry Summers a witness to the abuse of  
5 those minors?

6 A. You'd have to tell me who Larry Summers is.

7 Q. Is Al Gore a witness to the sexual abuse of  
8 minors?

9 A. Again, he wasn't around all the time. I  
10 only met him once so I can't say that he is.

11 (Thereupon, VR Defendant's Exhibit No. 7,  
12 was Marked for Identification.)

13 BY MS. BORJA:

14 Q. Ms. Giuffre, you have what's been marked as  
15 VR Exhibit 7 in front of you?

16 A. Yes.

17 Q. This is the Daily Mail article titled  
18 teenage girl recruited by pedophile, and it goes on. Do  
19 you see that?

20 A. Yes.

21 Q. Can you turn to page 3 of 31 of this  
22 printout. Do you have that?

23 A. Yes. I do.

24 Q. Right above the photograph there it says,  
25 Virginia disclosed that Mr. Clinton's Vice-President, Al

1 Gore and his wife Tipper were also guests of Epstein on  
2 the island. Do you see that?

3 A. Yes, I do.

4 Q. Is that true statement in the article?

5 A. It is a true statement that I did meet Al  
6 Gore and his wife, but I cannot 100 percent lock down  
7 that it was at the island, it could have been New York.

8 Q. Did you tell Ms. Churcher that it was on  
9 the island?

10 A. I did tell Ms. Churcher that I thought it  
11 was on the island and this is how it was printed out.

12 Q. Is Kevin Spacey a witness to the sexual  
13 abuse of minors?

14 A. I don't know Kevin Spacey so I can't say  
15 that he is or isn't.

16 Q. Do you know who he is?

17 A. I know who he is.

18 Q. Do you know how often, if ever, he was at  
19 any Epstein property?

20 A. I was never there as an eye witness to see  
21 that.

22 Q. Now, you refer to nude pictures a second  
23 ago. Do you recall that?

24 A. Yes.

25 Q. Where in the -- start with the Little Saint



1 James island, where in that property were there nude  
2 pictures?

3 A. So there was nude pictures in -- I don't  
4 know how to explain it, you've got a main house, I don't  
5 know, have you seen pictures of the island?

6 Q. You can just describe it as best you can?

7 A. Well, in the main house not attached to  
8 Jeffrey's room there's a, I don't know if you want to  
9 call it an entertaining room, it looks like a living room  
10 but it's bigger than that. It has TV, couches and  
11 everything like that in there. There is nude photographs  
12 all over that room.

13 There is nude photographs in -- adjacent to  
14 the right-hand side is Ghislaine Maxwell's office,  
15 there's nude photographs in there. Away from the main  
16 house in Jeffrey Epstein's private bedroom there are nude  
17 photographs in there.

18 Q. In these locations where there's nude  
19 photographs is that where Epstein guests go typically?

20 MS. MCCAWLEY: Objection. Are you  
21 referring this one house or all the houses?

22 BY MS. BORJA:

23 Q. That's what we're talking about?

24 A. The main house?

25 MS. MCCAWLEY: Right.

1           A.       Right outside the main house is the main  
2 dining table. So in order for you to get to the dining  
3 table, I mean, you could walk from outside, but  
4 considering if you're coming from inside to outside, yes,  
5 you would have to cross those.

6           Q.       So did guests of Jeffrey Epstein typically  
7 see those nude photographs to the best of your  
8 understanding?

9           A.       To the best of my understanding, yes.

10          Q.       Where were there nude photographs in the  
11 Palm Beach house?

12          A.       As soon as you walked into the front door  
13 there was a large hallway table and I would assume, my  
14 assumption is there is at least 50 photographs on that  
15 table, some with nude photographs, some with girls in  
16 raunchy, forgive me when I say raunchy, I mean lingerie  
17 photos mixed in with Jeffrey and some of the privileged  
18 people he's met, such as, you know, I don't know, like  
19 old girlfriends or models or Naomi Campbell or whatever  
20 the case is; but among all of those photographs would be  
21 nude photographs.

22          Q.       And this is, when you say, was it the front  
23 room or front table?

24          A.       Like as soon as you walked through the  
25 front door of the mansion the first thing that you see is

1 is that hallway table, on that hallway table is there.

2 Q. And that front door that you were referring  
3 to is the one that guests walk in?

4 A. Yes, and also upstairs in Jeffrey's massage  
5 room there is a hidden room where nude photographs from  
6 the floor to the ceiling all over, right, so there's not  
7 one piece of white showing.

8 Q. Let me ask you about that?

9 A. And then there's boxes and boxes and boxes  
10 of nude photographs.

11 Q. You say this is a hidden room, what do you  
12 mean by that?

13 A. It's not a room that you could just walk in  
14 and see. It's something that Jeffrey would show you. So  
15 in the massage room you've got the shower, the steam  
16 shower, the message table in the middle, and to your, I'm  
17 bad at left and right, if I was facing this way it would  
18 be my left. It's like a closet, top to bottom with nude  
19 photographs.

20 Q. Is this a place where guests typically  
21 when?

22 A. If you were having a massage, yes.

23 Q. Did all guests get massages in this hidden  
24 room?

25 A. I can't say that all guests did.

1 Q. Is that where Professor Dershowitz' massage  
2 was?

3 A. Yes.

4 Q. Where were there nude photographs in New  
5 York?

6 A. In New York, so you would have to go  
7 upstairs, make a left into Jeffrey's office, all over the  
8 table, sorry, can I go back to Palm Beach. I forget  
9 another place.

10 MS. MCCAWLEY: Yes, you're allowed to  
11 finish your answer.

12 A. Back to Palm Beach there was -- so you walk  
13 into the front door and I told you about that table and  
14 again, I'm bad at left and right, but if I'm facing the  
15 door this way you make a right and there's Jeffrey's desk  
16 and then Ghislaine's desk and all over their desks were  
17 nude photographs, all over the computer, like, you know  
18 the screen pages that you get pop up, nude photographs on  
19 that as well. So I just wanted to mention those, and  
20 outside the cabana, sounds horrible, outside by the  
21 cabana by the pool there's more nude photographs.

22 Q. And these are all locations where guests  
23 would be?

24 A. Yes.

25 Q. And it was frequent that guests would have

1 the opportunity to see these as they were going through  
2 the house?

3 A. Yes, if you walked through Jeffrey's house  
4 there is not a chance that you could not see nude  
5 photographs.

6 Q. Were the photographs ever changed or taken  
7 down when guests were there?

8 A. No. Like I said, he was not ashamed.

9 Q. Were there also nude photographs in New  
10 Mexico?

11 A. Yes, but more in his, like I guess you  
12 would call it an office. It's not like Florida where you  
13 just walk in and you see it right there, it was more  
14 you'd have to go to his office to see them. I'm just  
15 trying to recollect. There was some by his bedside  
16 table, and I honestly think that's all I can remember  
17 seeing them around the New Mexico house.

18 Q. Did guests go by Jeffrey's bedside table?

19 A. Sometimes if there was -- something was  
20 happening.

21 Q. If you were just a visitor for a dinner  
22 party for example?

23 A. No, if you were there for a dinner party  
24 you wouldn't go into his bedroom.

25 Q. If you were just a guest for a dinner party

1 in New Mexico would you see nude photographs in getting  
2 to the dining room?

3 A. No. I don't think we finished New York,  
4 did we?

5 Q. You tell me?

6 A. I don't think we did. I think I skipped  
7 from telling you about New York and went back to Palm  
8 Beach. So should I touch back to New York?

9 MS. MCCAWLEY: Finish your answer. Yes.

10 A. New York. So there was pictures on his  
11 desk in the office and around that room, and then there's  
12 this room that I refer to as the dungeon and that had a  
13 huge photograph of me and another girl, I mean huge as in  
14 bigger than that wall cabinet. There's a painting of  
15 both of us doing salacious acts together.

16 Q. Salacious acts?

17 A. Sexual acts, you know what I'm saying?

18 MR. SCAROLA: Could I request that the  
19 camera pan to above Virginia so as to show the  
20 wall cabinet and then come back down if you would,  
21 please? Thank you.

22 BY MS. BORJA:

23 Q. Now, the Dubins, they visited Jeffrey  
24 Epstein's property, correct?

25 A. Yes.

1 MS. MCCAWLEY: Objection.

2 BY MS. BORJA:

3 Q. [REDACTED]

4 [REDACTED]?

5 A. Yes, [REDACTED].

6 Q. And the children would see these nude  
7 photographs in the property?

8 A. Yes.

9 Q. And both the parents would?

10 A. Yes.

11 Q. Were there other children that saw these  
12 nude photographs?

13 A. I mean, if you're talking about minors,  
14 then yes.

15 Q. When you saw Alan Dershowitz visiting  
16 Jeffrey Epstein's properties did you ever see his wife  
17 [REDACTED]?

18 A. No.

19 Q. Did you ever see his grandchildren?

20 A. No.

21 Q. Do you know whether they were there or not?

22 A. I don't know if they were there, but I did  
23 not see them.

24 Q. Now [REDACTED] is somebody who was at  
25 Jeffrey Epstein's properties, correct, at least at one,

1 right?

2 A. Yes.

3 Q. Which property was that?

4 MS. MCCAWLEY: It's previously -- she's a  
5 childhood victim. We're objecting to a line of  
6 testimony regarding details about sexual  
7 encounters with [REDACTED]. If you know if she  
8 was in a location you can state that, but you  
9 don't have to give details.

10 SPECIAL MASTER: She's asking only the  
11 location at this point.

12 A. I'm just looking out for her. She was a  
13 victim. Yes, she was at all of his residences.

14 Q. Did her mother ever come to visit any of  
15 these residences?

16 A. I never met her mother.

17 Q. Do you know whether her mother did?

18 A. I don't know.

19 Q. You never met [REDACTED]

20 A. No.

21 Q. How much were you paid for messages?

22 MS. MCCAWLEY: I'm going to -- just give me  
23 a moment. This is one of the areas that Judge  
24 Lynch quashed discovery on. I know you've made a  
25 ruling on that, but I want to make my record. He



1           made a ruling that she did not have to go through  
2           a remuneration of funds as a result of the  
3           activities she was forced to participate in.  
4           That's the request.

5                   SPECIAL MASTER: Let me take a look at  
6           this.

7                   MS. MCCAWLEY: Sure. That was question 20  
8           and he quashed that.

9                   MS. BORJA: Can you tell me which duces  
10          tecum request you're saying this is?

11                   MS. MCCAWLEY: I believe it's request 20.  
12          All documents showing any payments or remuneration  
13          of any kind made by Epstein or his agents or  
14          associates to you from June 1999 to December 31,  
15          2002.

16 BY MS. BORJA:

17           Q.       I'll ask another question. You've made  
18          statements that you were paid \$200 a massage, correct?

19                   MS. MCCAWLEY: Objection. Same objection.  
20          He did not make her produce documents or have any  
21          testimony regarding the payments she received.

22                   SPECIAL MASTER: Do you have a statement  
23          particularly you're referring to?

24 BY MS. BORJA:

25           Q.       You were paid for sexual services by

1 Jeffrey Epstein, right?

2 A. Yes.

3 Q. Did you pay taxes on those?

4 A. No.

5 Q. Why not?

6 A. It was cash payment.

7 Q. You were a waitress at the Roadside Grill,  
8 right?

9 A. Yes, for a very short time.

10 Q. Did you pay taxes on that?

11 A. Not that I know of. No, I don't think I've  
12 ever paid taxes in the U.S.

13 Q. And you haven't paid taxes since you  
14 returned?

15 A. I haven't worked here since I returned.

16 Q. When you got the \$160,000 for the media  
17 deal you didn't pay taxes on that?

18 MS. MCCAWLEY: Objection. Go ahead.

19 A. I did pay taxes on that in Australia.

20 Q. But not in the U.S.?

21 A. It was given to me in Australian money so I  
22 paid for it in Australian taxes.

23 Q. When you worked at Mar-a-Lago did you pay  
24 taxes?

25 A. No, I was only there a very short period of

1 time. Max maybe pulled in two paychecks, so no. I think  
2 as a young age I think there's an exemption if you're 15  
3 or something like that you don't have to pay tax. That's  
4 what I heard. I'm not too sure if that's correct or not,  
5 but no, I didn't pay tax on it.

6 Q. What was the last grade that you completed  
7 in school?

8 A. I believe it was the ninth grade.

9 Q. Did you ever complete your GED?

10 A. I attempted to complete my GED, but I never  
11 did.

12 Q. And over what period of time did you  
13 receive payment for any sexual acts?

14 MS. MCCAWLEY: Same objection that I had  
15 before.

16 SPECIAL MASTER: You can answer.

17 A. From 1999 to 2002.

18 Q. Until when in 2002, until you left?

19 A. Yeah, even after I left Jeffrey sent me  
20 money in Thailand Western Union just to help pay for my  
21 school that I was being sent to and just living expenses.

22 Q. How long were you in Thailand?

23 A. I believe I was there from September, I  
24 can't remember the exact date in September, but let's  
25 just say early September and then after I married my

1 husband we went on a honeymoon. I think I came to  
2 Australia, I think it was November.

3 MS. BORJA: I don't want to take a lot of  
4 time, I don't know why I'm not putting my hands on  
5 this document right now. I'll just have it marked  
6 and give you the original.

7 (Thereupon, VR Defendant's Exhibit No. 8,  
8 was Marked for Identification.)

9 BY MS. BORJA:

10 Q. I'm going to read to you, I'll hand it to  
11 you in a second, read to you the document that is marked  
12 as VR Exhibit Number 8 and it says, at page 3 of 29,  
13 "Epstein, a Wall Street money manager who once counted  
14 Bill Clinton and Donald Trump amongst his friends, became  
15 the subject of an undercover investigation in 2005 after  
16 the stepmother of a 14-year old girl claims she was paid  
17 \$200, 125 pounds sterling to give an erotic massage." Do  
18 you see that?

19 A. What paragraph is that on?

20 Q. Top of the page.

21 A. However, he avoided trial. Yes. Yes, I  
22 do.

23 MS. MCCAWLEY: So I'm objecting as to any  
24 testimony regarding payments to you if it's a  
25 payment to someone else.

1                   SPECIAL MASTER: Right now the only  
2                   question pending is do you see that paragraph?

3 BY MS. BORJA:

4                   Q. Was that a standard payment for massages by  
5 Jeffrey Epstein?

6                   MS. MCCAWLEY: You can answer that.

7                   A. Yes, it is.

8                   Q. What's the basis for your testimony in that  
9 regard?

10                  A. It was the basis for my testimony?

11                  Q. How do you know that's a standard payment?

12                  A. That's -- are you trying to trick me into  
13 another question?

14                  MS. MCCAWLEY: I have an objection to this  
15 line of questioning, I mean I do. I have an  
16 objection based on a quash. If the article  
17 references a payment and you're familiar with that  
18 payment.

19                  MS. BORJA: Counsel, speaking objections  
20 are not appropriate.

21                  MS. MCCAWLEY: I'm making my objection for  
22 the record.

23                  SPECIAL MASTER: Hang on. Finish making  
24 your objection. Try not to instruct the witness  
25 during the objection. Okay. You can answer the

1 question.

2 A. So can you repeat that question for me?

3 SPECIAL MASTER: Go ahead and repeat it off  
4 the record so we get the exact wording.

5 (Last question read back by the court  
6 reporter.)

7 A. Yes, I do.

8 Q. What's the basis for that statement?

9 A. That's what we were given.

10 Q. Who is we?

11 A. Any of the girls that had to service  
12 Jeffrey. I'll speak for myself alone.

13 Q. That's per message?

14 A. Yes.

15 (Thereupon, VR Defendant's Exhibit No. 9,  
16 was Marked for Identification.)

17 BY MS. BORJA:

18 Q. Ms. Giuffre, I have handed you document a  
19 that's been marked as VR Exhibit 9, which is a  
20 declaration of Virginia Giuffre?

21 A. Yes.

22 Q. You've seen this document before?

23 A. I've seen a lot of documents, but yes I  
24 have seen this.

25 Q. On page 6, please.

1 MS. MCCAWLEY: Is there a copy for me?

2 MS. BORJA: Do you have one?

3 MR. SCAROLA: No. Thank you. Page 6 is  
4 that where we are?

5 BY MS. BORJA:

6 Q. Yes, paragraph 20. You say here in your  
7 affidavit, Dershowitz was so comfortable with the sex  
8 that was going on that on one occasion he observed me in  
9 sexual activity with Epstein. Do you see that?

10 A. Yes.

11 Q. And that's the same event that you  
12 testified earlier where you testified that Professor  
13 Dershowitz walked into Jeffrey Epstein's private bedroom?

14 A. Yes.

15 Q. And we talked about the six instances  
16 earlier today and I believe you've indicated that they  
17 were at six different locations, correct?

18 A. At least, yes.

19 Q. Are there any other instances that you  
20 recall?

21 A. Not off the top of my head.

22 Q. Think about it. I want your best testimony  
23 today before we leave?

24 A. All I can remember right now at this time  
25 is these approximately six times.

1 Q. Why didn't you mention the limousine in  
2 your affidavit?

3 MS. MCCAWLEY: Objection. To the extent  
4 that this pertains to a conversation you had with  
5 your lawyers she can't reveal that, anything else  
6 you can reveal.

7 SPECIAL MASTER: You can answer.

8 MS. MCCAWLEY: If you can answer without  
9 talking about what you discussed with your  
10 lawyers.

11 A. At that time I wasn't asked about it and it  
12 came to me while thinking about it later on.

13 Q. When did it first come to you?

14 A. I don't know the exact date or time. Like  
15 I said to you earlier it's, trust me, this is not stuff  
16 you want to remember, this is stuff you want to try to  
17 throw away in the back of the garbage can in your head,  
18 and it took me a long time to be able to do that and move  
19 on with my life. And when Jeffrey got away with  
20 everything that he had gotten away with it infuriated me  
21 so then I wanted to do something about it which is why I  
22 started thinking about the things more and more and more;  
23 and sometimes the more and more and more I thought about  
24 it, the more I would remember certain occasions.

25 Q. But you didn't remember the limousine as of



1 the time of this affidavit?

2 MS. MCCAWLEY: Objection.

3 SPECIAL MASTER: You can answer.

4 MS. MCCAWLEY: You can answer.

5 A. Apparently not.

6 Q. Have you ever told anybody about having sex  
7 in the limousine with Alan Dershowitz?

8 MS. MCCAWLEY: Outside of your lawyers.

9 A. Outside of my lawyers, no.

10 Q. Did you ever tell your lawyers?

11 MS. MCCAWLEY: Objection. I'm not going to  
12 have her testify as to what she told the lawyers.

13 SPECIAL MASTER: We're not going to allow  
14 that.

15 BY MS. BORJA:

16 Q. It's your privilege, the attorney/client  
17 privilege.

18 MS. MCCAWLEY: She's not waiving her  
19 privilege.

20 MS. BORJA: Counsel, can I make my record?

21 SPECIAL MASTER: You've said -- go ahead  
22 and make your record.

23 BY MS. BORJA:

24 Q. You hold the privilege, you're the decider.  
25 The attorney/client privilege belongs to you. If you

1 would like to waive it you have that opportunity to do  
2 it?

3 A. I decide not to waive my privilege at this  
4 time. Thank you.

5 MR. SCAROLA: She would really like to be  
6 able to give you the answer to that question.

7 MS. BORJA: Counsel, I would appreciate --

8 MR. SCAROLA: All right. I couldn't  
9 resist.

10 MS. BORJA: This is not a game, this is not  
11 a joke to the witness or to the attorneys who are  
12 here for the correct purposes. So please don't  
13 make this a joke today.

14 SPECIAL MASTER: Let's move on.

15 MR. SCAROLA: I absolutely agree with you.  
16 It is not a joke.

17 SPECIAL MASTER: Let's move on. I  
18 understand. Let's move on.

19 BY MS. BORJA:

20 Q. Did you ever tell anybody other than your  
21 lawyers ever about your allegation that you had sex in  
22 the limousine?

23 A. I've spoken with my husband about the times  
24 and experiences that I had with Dershowitz.

25 Q. Including the limousine?

1           A.       Including all of the times that I can  
2 remember that I've told him. I mean, he's my best friend  
3 so.

4           Q.       This affidavit was signed November 20th,  
5 2015. So around this past Thanksgiving. So you first  
6 remembered it since Thanksgiving?

7           A.       Yes.

8           Q.       So, since Thanksgiving have you had  
9 conversations with anybody about the allegation?

10          A.       Other than my lawyers, no. I mean, the  
11 only other person that would know anything about this  
12 would be my husband, but I mean, it's only because  
13 recently we've just been dealing with a lot of this.

14          Q.       How long did that sexual activity in the  
15 limousine take place?

16          A.       Not long.

17          Q.       What happened?

18          A.       You want a description?

19          Q.       I would like to know what happened in that  
20 limousine that is the abuse that you're alleging  
21 happened?

22          A.       Jeffrey instigated it, the men pulled out  
23 their, the wording for this is just anatomy. They pulled  
24 out their anatomy, their genitals and we were told to  
25 perform oral sex on them.

1 Q. There was no discussion between the  
2 gentlemen beforehand that you heard?

3 A. You know, I don't know the exact terms that  
4 they used during that time, but Jeffrey insinuated it and  
5 Alan agreed to it, so yes.

6 Q. The time on the plane where you allege that  
7 you and another female participated in sexual activity,  
8 was that at the same time?

9 MS. MCCAWLEY: Objection.

10 A. What, the girl and me and Jeffrey and  
11 Dershowitz, was that like all together?

12 Q. Tell me what happened on the plane?

13 A. It went from --

14 MS. MCCAWLEY: Just use the best terms you  
15 can. Take your time.

16 A. Sorry, it wasn't from giving foot massages,  
17 which is a normal thing that we would do on the plane to  
18 Jeffrey again insinuating, you know, we should -- him and  
19 Alan, we should kind of do this. I don't know their  
20 exact wording so I'm not going to put words in their  
21 mouth. But it went from foot massages to oral sex to  
22 intercourse.

23 Q. So who was involved, I mean, you were  
24 sexually involved with Professor Dershowitz, correct?

25 A. Yes. It was kind of -- to be honest it

1 was --

2 MS. MCCAWLEY: Use a term that you can use.

3 A. It was a little bit of mix and match, it  
4 sounds horrible. So at first I went down -- oh God, I  
5 can't believe I'm saying this. At first I gave oral sex  
6 to Epstein, and the other girl gave oral sex to  
7 Dershowitz, and then we swapped within, I would say  
8 seconds, like 60 seconds to a minute we were told, you  
9 know, they wanted us to get on top so we mounted them and  
10 we straddled them and we performed intercourse on a bed  
11 in the airplane.

12 Q. The foot messages, who gave who foot  
13 messages?

14 A. I believe I was giving Jeffrey a foot  
15 massage and the other young lady was giving Dershowitz a  
16 foot message?

17 Q. Anything else happen during that flight?

18 A. After the sexual experiences, which is what  
19 I had been trained to do anyway, which was not out of the  
20 ordinary, I went to the back of the plane, got washcloths  
21 and proceeded to clean Jeffrey and Dershowitz up with a  
22 warm washcloth.

23 Q. During this activity were condoms used?

24 A. No.

25 Q. Were condoms ever used with Professor

1 Dershowitz?

2 A. No, and they weren't used with any other  
3 people as well.

4 Q. Were the other people that you were sexual  
5 trafficked to?

6 A. No.

7 Q. Did you ever ask to use a condom?

8 A. No, I mean, Jeffrey had us tested quite  
9 regularly so we knew we were clean.

10 Q. You've never had a sexually transmitted  
11 disease?

12 A. No.

13 Q. Where would you get tested?

14 A. At a doctors. To be specific a  
15 gynecologist.

16 Q. Who was your doctor?

17 A. A gynecologist in Palm Beach.

18 Q. Who is that?

19 A. I have no idea.

20 Q. Were you ever hospitalized during 1999 to  
21 2002?

22 A. Yes.

23 Q. For what?

24 MS. MCCAWLEY: I object to the extent that  
25 this gets into private medical discussions. I

1 don't think she has to do that in this deposition.

2 SPECIAL MASTER: Please answer the  
3 question.

4 A. To this day I'm actually confused about the  
5 whole situation. If you want me to get into detail about  
6 it.

7 SPECIAL MASTER: Listen to her question.

8 Her question was --

9 A. Yes, I was medically brought to a hospital.

10 Q. For mental health or physical health?

11 A. Physical.

12 Q. It didn't have anything to do with a  
13 sexually transmitted disease; is that correct?

14 A. No, it wasn't a sexually transmitted  
15 disease.

16 Q. Do you know which hospital you were treated  
17 at?

18 A. No, but I know it was in New York.

19 Q. Were you admitted into the hospital to stay  
20 or was it you went to the emergency room and they let you  
21 out the same day?

22 A. I was admitted to the emergency room and I  
23 think I stayed two days. It could be more, it could be  
24 less. I know they heavily sedated me. I'm not too sure.

25 Q. Were you given any medication as a result

1 of --

2 A. Yes.

3 Q. What were you given?

4 A. I don't know. I mean, I'm a young kid, I  
5 didn't know the medications or the terminology or  
6 anything. I think it was some kind of antibiotic.

7 Q. You weren't given some sort of pain  
8 reliever?

9 A. Yes, I was given pain relief at the  
10 hospital. I think I left the hospital with the  
11 antibiotics.

12 Q. Do you have a book agent?

13 A. What's a book agent?

14 MS. MCCAWLEY: Objection.

15 BY MS. BORJA:

16 Q. Somebody to help you negotiate a book or  
17 media contract?

18 MS. MCCAWLEY: Objection. This is again  
19 one of the requests that Judge Lynch quashed  
20 relating to their inquiry and their subpoena as to  
21 communications with -- it's actually two of them.  
22 He quashed 9, communications with media; he  
23 quashed 17, communications relating to potential  
24 book deals, et cetera.

25 It's absolutely relevant as to whether or



1 not Professor Cassell and Mr. Edwards were defamed  
2 by Professor Dershowitz is what this case is  
3 about. It's not about any media inquiries or any  
4 book deals or anything of that nature.

5 SPECIAL MASTER: And your position?

6 MS. BORJA: This is a discovery deposition.  
7 This may lead to discovery of admissible evidence,  
8 and I understand that this witness doesn't want to  
9 provide this information but we can pursue it from  
10 third parties, and blocking us in this way is  
11 inappropriate. I simply asked for the name of an  
12 agent.

13 MS. MCCAWLEY: So they lost in front of  
14 Judge Lynch and now they're trying to win here, I  
15 mean, it's totally inappropriate. He ruled in our  
16 favor. I have a motion to quash, and she  
17 shouldn't have to be forced to testify as to those  
18 items.

19 SPECIAL MASTER: And your question is  
20 whether she has a book agent? That's the  
21 question?

22 MS. BORJA: Right.

23 SPECIAL MASTER: I think you can answer  
24 that question.

25 A. Well, I don't have a book deal, but I have

1 looked into getting a book agent.

2 SPECIAL MASTER: Do you have a book agent  
3 is the question?

4 A. Not at this time, no. I did at one time.

5 Q. When did you have one?

6 A. Book in 2012, maybe the end of 2011.

7 Q. Who was that?

8 MS. MCCAWLEY: Again, I object to all this  
9 testimony. We had a motion to quash on this. We  
10 won that motion to quash for the reasons we argued  
11 in court in front of Judge Lynch and the testimony  
12 is not appropriate.

13 SPECIAL MASTER: You can answer the  
14 question if you know the person's name.

15 A. His name is Gerad?

16 Q. Who does he work for?

17 A. I don't know the name of his company. He  
18 was just a small time guy. He worked with rappers  
19 before. That's about all I know about him. I don't know  
20 if we even actually signed anything saying he was my  
21 agent. He said he was interested, he read the stuff by  
22 Sharon Churcher. I think he was going to represent me if  
23 a book ever came out or if a book deal ever happened and  
24 nothing ever happened, so he's not representing me.

25 Q. Did you tell him about Professor

1 Dershowitz?

2 A. No.

3 Q. Why not?

4 A. Because we didn't even talk in lengthy  
5 discussion about that. We mostly talked about -- if I  
6 were going to have -- I can't say that. I mean, it's  
7 mostly about the sickening discussions, I mean, sickening  
8 ordeal that Epstein got away with so many counts of  
9 maliciously hurting minors and got away with it. That's  
10 more my idea if I was going to ever write a book.

11 Q. Do you have any agreement or understanding  
12 with Boise, Schiller regarding what would happen if you  
13 did receive any monetary amounts from Mr. Wexner?

14 MS. MCCAWLEY: I'm going to object to this.  
15 This gets into the relationship that she has with  
16 our firm and that's attorney/client privilege.  
17 You don't have to respond to any of that.

18 SPECIAL MASTER: I'm going to grant that  
19 motion.

20 BY MS. BORJA:

21 Q. Did you receive a payment of 10 or \$15,000  
22 after you claim that you had sex with Prince Andrew?

23 MS. MCCAWLEY: Objection, it gets into the  
24 remuneration of which has already been quashed in  
25 one of the questions.

1 MR. SCAROLA: I also don't understand the  
2 scope of the question. From whom, for what, did  
3 she ever get 10 or \$15,000 in the last years  
4 unrelated to this case? The objection is  
5 overbroad, vague, confusing.

6 SPECIAL MASTER: Put a time frame on it  
7 counsel and then I'll see. Put a time frame.

8 BY MS. BORJA:

9 Q. 2011 were you paid 10 to \$15,000 by or on  
10 behalf of Jeffrey Epstein for having sex with Prince  
11 Andrew?

12 A. 2011.

13 Q. I'm sorry 2001?

14 A. Is that granted?

15 SPECIAL MASTER: I didn't make a  
16 determination yet.

17 MS. MCCAWLEY: Same objection.

18 THE WITNESS: Sorry.

19 SPECIAL MASTER: I'm going to allow the  
20 question. I'm going to overrule the objection.  
21 You can answer if you know.

22 A. Yes, I did receive \$15,000. I don't know  
23 what equivalent that is to pounds. I received it in  
24 American dollars.

25 COURT REPORTER: Repeat that again.

1           A.     I did receive \$15,000. I do not know the  
2 equivalent to what that is in pounds.

3           Q.     And you didn't pay taxes on that?

4           A.     No.

5           Q.     When did you first retain Paul Cassell as  
6 your counsel?

7                   MS. MCCAWLEY: You can give the date but  
8 can't get into discussions you had with Mr.  
9 Cassell.

10                   SPECIAL MASTER: That's the question.

11          A.     I don't know the exact date, I'm sorry.

12          Q.     What's your best estimate?

13          A.     Well, I started talking to Brad in the fall  
14 in 2011, but I never met them personally until 2013 I  
15 think. So I don't know when I officially became their  
16 client.

17          Q.     When do you consider that you became their  
18 client, was it when you first met them?

19          A.     Personally, like face to face?

20          Q.     I'm asking you that question? I'm not  
21 suggesting that's the answer.

22          A.     No, that's why I'm asking you. When I  
23 talked to them on the phone or met them face to face?

24          Q.     Do you consider when you met them face to  
25 face as being the first time that you engaged them or

1 some other time?

2 A. I believe when we first met face to face is  
3 when I became their client, I think that's right.

4 Q. When did you first meet Brad Edwards face  
5 to face?

6 A. The same time I met Paul. I think it's  
7 2013.

8 Q. Whenever it was that's when you engaged him  
9 to be your lawyer in your mind?

10 A. Well, in my mind. It could have been 2011  
11 when we started talking. I don't officially know. I  
12 really just trying to answer you honestly if possible.

13 Q. But your understanding is when you met them  
14 you wanted them to represent you?

15 A. Oh yeah, I wanted them to represent me from  
16 2011. I just wanted to be a part of the CVRA case. I  
17 wanted my story to be heard and I wanted to help other  
18 victims out there, so yes.

19 MR. SCAROLA: I'm going to observe that I  
20 think there are about 15 minutes left on the four  
21 hour allocation and I would like some time for  
22 examination of the witness.

23 SPECIAL MASTER: There's actually how much?

24 THE VIDEOGRAPHER: Seven.

25 MR. SCAROLA: Seven minutes left.

1 MS. BORJA: You did not cross notice this  
2 so if counsel wants to give you time that would be  
3 up to counsel.

4 MR. SCAROLA: I don't know that it's  
5 necessary for me to cross-notice the depo.

6 SPECIAL MASTER: Hang on one second. We  
7 have seven minutes, let's spend it wisely.  
8 Counsel is not finished with her examination. So  
9 she is entitled to complete her examination before  
10 handing it off.

11 MS. MCCAWLEY: I'm comfortable allowing her  
12 four hours and then if you have questions we can  
13 deal with that.

14 (Thereupon, VR Defendant's Exhibit No. 10  
15 was Marked for Identification.)

16 BY MS. BORJA:

17 Q. Ms. Giuffre, I've handed you a document  
18 that's been marked as VR 10 which is a Federal Bureau of  
19 Investigation document consisting of 12 pages. Do you  
20 have that?

21 A. Yes, I do.

22 Q. Have you seen that before today?

23 A. Yes, I have.

24 Q. When did you first see this?

25 A. I'm not too sure if the FBI gave me a copy

1 of it. I think it's a possibility that they did,  
2 otherwise I would have seen it from my lawyers.

3 Q. If the FBI gave you a copy of it what would  
4 you have done with it?

5 A. Probably put it in a big file in the back  
6 of my closet.

7 Q. Do you keep a big file in the back of your  
8 closet with your personal papers?

9 A. You should see my filing system, it's quite  
10 horrible.

11 Q. Do you have -- actually let's turn to page  
12 10 of 12?

13 MS. MCCAWLEY: Numbered at the top, the  
14 very corner.

15 A. Okay.

16 Q. It says Giuffre recalled meeting, and then  
17 it's redacted. Giuffre was using Xanax, heavily at the  
18 time. Her recollection was not clear. She remembered  
19 that there were many models on the island that did not  
20 speak English along with a modeling person who had an  
21 unknown accent. Do you see that?

22 A. Yes.

23 Q. Do you know what incident this is referring  
24 to.

25 A. With all the blanks there, that's not a



1 unusual thing because there was lots of models there.

2 Q. Do you remember telling the FBI that you  
3 couldn't remember an incident because you were using  
4 Xanax heavily at the time and your recollection was not  
5 clear?

6 A. No, I remember telling them that I used  
7 Xanax so of course things are going to be foggy, but some  
8 things severely stick out, you just can't remember no  
9 matter how much Xanax or anything else you take.

10 MR. SCAROLA: Could you read that last  
11 response back again, please?

12 MS. BORJA: During your deposition you can  
13 read back.

14 MR. SCAROLA: No, I would like -- I'm not  
15 sure that I heard it correctly. If I could hear  
16 it back now please?

17 MS. BORJA: No, you can read it on cross  
18 examination. I'm moving on.

19 SPECIAL MASTER: Hold on a second. Read it  
20 back so we can move on.

21 MR. SCAROLA: Thank you.

22 (Last answer was read back by the court  
23 reporter.)

24 MR. SCAROLA: Thank you.

25 SPECIAL MASTER: Counsel?

1 BY MS. BORJA:

2 Q. When we started today I asked you about the  
3 subpoena duces tecum that's been marked in this case do  
4 you have that?

5 A. I don't know of the subpoena.

6 MS. MCCAWLEY: It's going to be one of the  
7 exhibits here.

8 SPECIAL MASTER: Are you talking about the  
9 actual notice?

10 MS. BORJA: I'm asking about the actual  
11 notice.

12 MS. MCCAWLEY: I don't think that was  
13 marked. I'm sorry, there is a schedule A attached  
14 to the notice you marked. If you flip this page  
15 on the notice.

16 SPECIAL MASTER: VR 1, there's a schedule  
17 attached to VR 1.

18 MS. MCCAWLEY: You can use mine.

19 A. Which page would you like me to look at?

20 Q. Let's start with schedule A, number 1.

21 Have you seen this document before?

22 A. No, other than maybe you showing it to me  
23 today. It's in my pile. It's not in my pile, is it? I  
24 don't know. I haven't seen it.

25 Q. Did you collect documents to give to

1 Professor Dershowitz as a part of this action?

2 A. Did I collect documents to give to  
3 Dershowitz?

4 Q. Correct?

5 A. Why would I do -- no.

6 Q. Do you have -- did you ever check to see if  
7 you have any original photographs in your possession?

8 A. Unfortunately, I don't have lots of  
9 photographs because I left a lot of things behind in  
10 America when I moved to Australia.

11 Q. Ms. Roberts, my questions is --

12 A. No, I don't have any in my hand or  
13 possession.

14 Q. Did you look for any?

15 A. I've seen the photos that I have and no, I  
16 don't see any of Alan Dershowitz in there.

17 Q. My question was, were you looking for any  
18 original photographs to produce to Professor Dershowitz  
19 in this case, did you look?

20 A. No.

21 MS. MCCAWLEY: Other than what your lawyers  
22 have done for you I think is what she's asking.  
23 You made a production in this case and I think she  
24 may have been asking you questions about that.

25 SPECIAL MASTER: Counsel, she's asking a

1 specific question of the witness.

2 A. I'm sorry, that's my fault, I didn't  
3 understand the question. But no, I was not looking for  
4 photographs for Dershowitz.

5 Q. Do you have any notes of any sort  
6 pertaining to Professor Dershowitz?

7 A. I've got lots of affidavits. I don't know  
8 what these things are called, documents. Yes, I do have  
9 lots of those.

10 Q. Do you have any drafts of those before  
11 they're final and you sign them?

12 A. No, I've got final -- I've got stuff like  
13 this, declarations signed on the back.

14 Q. You get a declaration at some point, right?

15 A. Yes.

16 Q. And it's not signed, correct?

17 A. I sign it and my lawyers print it out for  
18 me.

19 Q. Do you make any changes?

20 A. Not unless there needs to be changes, but  
21 my lawyers do a great job of recording everything that I  
22 say.

23 Q. But you've never made revisions, correct?

24 A. Not that I'm aware of.

25 Q. Have you made any notes, personal notes on

1 scraps of paper or notepads, the booklet pertaining to --  
2 other than the ones that you gave, the pages that you  
3 gave to Ms. Churcher?

4 A. I didn't give anything to Ms. Churcher  
5 about Alan Dershowitz, but when I'm going through, you  
6 know, my affidavits and stuff like that, if I do get a  
7 memory that sticks out, yes, I will write it down, you  
8 know, and think about it, but I don't have, you know,  
9 notes per se that have Dershowitz written all over it,  
10 no.

11 Q. But when you think of something you write  
12 it down to help you with your memory?

13 A. Yes.

14 Q. What do you do with those documents?

15 A. I'm a visual person so generally I just  
16 write them down and then I forget about it. It's not  
17 like -- I don't hold on to everything basically if that's  
18 what you're asking me.

19 Q. Does any of it go to the file in the back  
20 of the closet?

21 A. No, these do though. These are always back  
22 there, but, no.

23 Q. Did you ever look to see if you had any  
24 notes that related to any times that you met Professor  
25 Dershowitz?

1 A. Besides what's in these?

2 Q. Did you ever look to see if you had any  
3 personal notes in your writing that pertain to Professor  
4 Dershowitz?

5 A. Like from my old journal, the one that I  
6 burned?

7 Q. From anywhere. Did you ever make an effort  
8 to look?

9 A. Dershowitz could have been in my journal,  
10 he could have been. We're talking about an 85 page, if  
11 not more, you know, things that I had written to get my  
12 story out of my head and into pages; and yes, Dershowitz  
13 could have been in there, but that's up in the clouds  
14 now, bonfire.

15 Q. That's what you call your journals, what  
16 you burned, right?

17 A. Yes.

18 Q. And you wrote that journal in order to  
19 collect your thoughts?

20 A. To get everything out of here and on to  
21 paper.

22 Q. Have you made any other notes, though,  
23 since then to help you when you think of things?

24 A. Yes, sometimes like I said, sometimes when  
25 I read my affidavits and stuff like that, you know, and I

1 think of something else like a description of something  
2 that I forget about, you know what I mean, then yeah,  
3 I'll go back and I'll write it in the journal, you know,  
4 for instance, you know, what another girl would have  
5 looked like. Even though I can't identify her name or  
6 her age or anything like that, but I do remember like  
7 flashes of blonde, little things like that, but nothing  
8 -- I don't have any more journals.

9 Q. But those notes, they help your memory?

10 A. Sometimes. I'm a very visual person.

11 Q. And they help you with your affidavits?

12 A. No, they don't help me with my affidavits,  
13 my affidavits are already done, I just go back and it  
14 helps my memory. It helps me bring stuff out.

15 Q. What do you do with those notes?

16 A. Nothing, literally nothing. They're in a  
17 notebook that if I need to write it down. I have a dream  
18 notebook as well where I'll just write down my dreams and  
19 stuff. I do nothing, no one is seeing it.

20 Q. You read it? You keep it?

21 A. Yeah, I keep it.

22 Q. Okay. Have you gone back and read that  
23 recently?

24 A. No.

25 Q. Okay. You continue to make entries into

1 it?

2 A. Not so much about Dershowitz. It's mostly  
3 like feelings, dreams, you know, past things that I've  
4 gone through. Like I said, not so much pertaining to  
5 Dershowitz himself.

6 Q. And that's separate from your dream book?

7 A. No, it's all in one.

8 Q. Is it a spiral bound notebook?

9 A. Yes, it's just a cheap, like, actually it's  
10 in my kid's closet.

11 Q. At this point in time are you angry with  
12 Mr. Epstein?

13 A. Furious.

14 Q. Are you angry with Professor Dershowitz?

15 A. Absolutely.

16 Q. Are you angry with famous politicians?

17 A. I'm angry with anybody who has it in their  
18 mind that they can hurt and abuse a minor child and  
19 continue to lie about getting away with it and that what  
20 they've done is okay and they can continue to harass  
21 victims, yes, I'm furious.

22 Q. Are you angry with Professor Dershowitz for  
23 his role in representing Jeffrey Epstein in the criminal  
24 action?

25 A. Do I think he played a big part getting him



1 off, absolutely. So many other lawyers of his, I'm angry  
2 with them, too.

3 Q. Do you know what role Professor Dershowitz  
4 played in the criminal prosecution of Jeffrey Epstein?

5 A. No, by the time all the plea bargains and  
6 everything had happened I was just a notified victim. I  
7 didn't know, you know, hey, ex's said this and now this  
8 is going to be done. I was already way past that point  
9 and, hey, sorry, this is what you got to deal with.

10 Q. And you don't know personally what role he  
11 had in the non-prosecution agreements with Mr. Epstein,  
12 is that fair?

13 A. That's fair. I know he played a part in  
14 it, I know he was one of his lawyers.

15 Q. What part do you know he played in it?

16 MS. MCCAWLEY: Objection, asked and  
17 answered.

18 SPECIAL MASTER: You can answer.

19 MR. SCAROLA: Except to the extent that the  
20 information is derived from attorney/client  
21 privileged communications.

22 SPECIAL MASTER: Agreed.

23 THE WITNESS: What does that mean?

24 SPECIAL MASTER: Outside of what your  
25 lawyers discussed if you can answer that question.

1           A.     I knew he was his lawyer from what I've  
2 been told.

3           Q.     But you don't know anything specific  
4 regarding the non-prosecution agreements, correct?

5           A.     No.

6           MS. MCCAWLEY: Can we have a time check.

7           THE VIDEOGRAPHER: Four hours and  
8 seven minutes.

9           MS. MCCAWLEY: We're going to wrap this up.  
10 We've indulged --

11          SPECIAL MASTER: How much further do you  
12 have in this line?

13          MS. BORJA: In this line? Nothing, but I  
14 do have a lot more questions.

15          SPECIAL MASTER: I'm sure that you do.  
16 Okay. I think it's a good place for us to break  
17 because I think we've satisfied what I see as the  
18 Court's order, four minutes -- four hours and  
19 you've gone a little bit over, but that's actually  
20 the running time, correct?

21          THE VIDEOGRAPHER: Yes.

22          SPECIAL MASTER: Based upon the Court's  
23 order I think the deposition is concluded.

24          MS. MCCAWLEY: We're going to allow it be  
25 -- because I didn't interfere with her four hours,

1 so I allowed that to happen.

2 MR. SCOTT: We object to that. The Court's  
3 order said four hours. The Court's order provided  
4 for us to have the four hours and now all of a  
5 sudden by agreement of the plaintiff's attorney  
6 and the witnesses' lawyer without ever requesting  
7 it from the judge, we're now going to agree to  
8 extent the period?

9 SPECIAL MASTER: Mr. Scarola?

10 MR. SCAROLA: The Court's order provided  
11 for a four-hour deposition. I requested an  
12 opportunity to have some time within that four  
13 hours and we've allowed opposing counsel to use  
14 more than the four-hour time. I have probably  
15 five minutes worth of questioning and I would like  
16 an opportunity to be able to ask those questions.

17 MR. SCOTT: We oppose that and if he does  
18 then we want to re-direct.

19 SPECIAL MASTER: That was exactly the  
20 point. So just understand that if I do grant the  
21 extra time to Mr. Scarola of five minutes or not  
22 that they're going to get an opportunity to  
23 discuss the topics that he raises and we're going  
24 to sit here for however how long they're satisfied  
25 with those questions in the topic areas that he

1 raises. Do you understand that?

2 MS. MCCAWLEY: I do. So let's take a  
3 break. It's a moment to take a break and I'll  
4 discuss with these folks and we'll come back.

5 THE VIDEOGRAPHER: Going off video record  
6 2:25 p.m.

7 (A recess was taken.)

8 THE VIDEOGRAPHER: We're now back on video  
9 record 2:32 p.m.

10 SPECIAL MASTER: Just for the record, Mr.  
11 Dershowitz through counsel examined the witness  
12 for four hours and seven minutes and there was a  
13 request and it appears to be in agreement to  
14 allow.

15 MR. SCOTT: No agreement.

16 SPECIAL MASTER: Hang on one second. Hang  
17 on. Between Mr. Scarola and Ms. McCawley, to  
18 allow Mr. Scarola a couple questions on  
19 examination on cross and then my ruling is going  
20 to be as follows: You can go ahead and ask  
21 whatever questions you want, Mr. Scarola, at which  
22 time I will give opportunity for re-direct based  
23 upon the topics that you've raised.

24 MR. SCAROLA: With the understanding that  
25 re-direct is going to be limited to the area of

1 inquiry that I am about to conduct. I am about to  
2 conduct an inquiry.

3 SPECIAL MASTER: That is the understanding.  
4 My understanding of my ruling, I know that Mr.  
5 Dershowitz' team has objected to that. I also  
6 understand that there might be -- this is no  
7 impact or their right or anybody else's right to  
8 go back to Judge Lynch and ask for more time from  
9 this witness based upon my ruling or my reading of  
10 the original order.

11 MS. MCCAWLEY: And there's also the motion  
12 to strike the testimony that you allowed over the  
13 ruling.

14 SPECIAL MASTER: And there's a series of  
15 those things that might need to be cleaned up in a  
16 subsequent sitting.

17 MR. SCOTT: It's my understanding this is  
18 going to be limited to five minutes or less; is  
19 that correct?

20 MR. SCAROLA: That's what I anticipate.

21 MR. SCOTT: Over our objection, okay.

22 SPECIAL MASTER: Let's rock and roll.

23 CROSS-EXAMINATION

24 BY MR. SCAROLA:

25 Q. Virginia, has Brad Edwards ever pressured

1 you or encouraged you in any way whatsoever at any time  
2 and under any circumstances to provide false information  
3 about Alan Dershowitz?

4 A. Never.

5 Q. Has Brad Edwards ever pressured you or  
6 encouraged you in any way or under any circumstances at  
7 any time to provide false information about Jeffrey  
8 Epstein?

9 A. Never.

10 Q. Has he ever pressured you or encouraged you  
11 at any time or in any way, under any circumstances to  
12 provide false information about anyone or anything?

13 A. Never.

14 Q. Has Paul Cassell ever pressured you or  
15 encouraged you in any way, at any time, under any  
16 circumstances to provide false information about Alan  
17 Dershowitz?

18 A. Never.

19 Q. Has he ever pressured or encouraged you in  
20 any way at any time, under any circumstances to provide  
21 false information about Jeffrey Epstein?

22 A. Never.

23 MS. BORJA: Objection. I couldn't follow  
24 who he was.

25 BY MR. SCAROLA:

1 Q. Mr. Cassell, Professor Cassell? You  
2 understood that I was asking you that question about  
3 Professor Cassell, right?

4 A. And he's never pressured me or encouraged  
5 me in any way to talk --

6 MS. MCCAWLEY: I don't want you to go into  
7 discussions with them if you're saying something  
8 didn't happen --

9 SPECIAL MASTER: Just --

10 MS. MCCAWLEY: I'm preserving privilege. I  
11 just want to make sure if something didn't happen  
12 she can say that.

13 BY MR. SCAROLA:

14 Q. Has Professor Cassell ever pressured you or  
15 encouraged you in any way to provide false information  
16 about anyone or anything at any time?

17 A. Never.

18 Q. Apart from any efforts made by Jeffrey  
19 Epstein or agents on behalf of Jeffrey Epstein to silence  
20 you or to have you refrain from providing true and  
21 accurate information about the interactions that you had  
22 with Jeffrey Epstein and others to whom you were  
23 trafficked by Jeffrey Epstein, has anyone apart from that  
24 circumstance pressured you or encouraged you to provide  
25 false information about any of the topics that were

1 covered during the course of your examination?

2 MS. BORJA: Objection. Objection to the  
3 form. Leading, assumes facts not in evidence,  
4 compound, misleading.

5 SPECIAL MASTER: Your form objection will  
6 be reserved. You can answer.

7 A. No.

8 MR. SCAROLA: Thank you. I don't have any  
9 further questions.

10 MR. SCOTT: Judge, excuse me, none of this  
11 was covered on direct examination so we move to  
12 exclude and strike the entire testimony because  
13 none of this was covered on our direct. But we  
14 would like to request a two-minute recess because  
15 these are completely new areas.

16 SPECIAL MASTER: I'll grant your two-minute  
17 recess.

18 THE VIDEOGRAPHER: Going off video record  
19 2:37 p.m.

20 (A recess was taken.)

21 THE VIDEOGRAPHER: We are now back on video  
22 record 2:41 p.m.

23 MR. SCAROLA: Could we have a reading how  
24 much time is used in my examination.

25 SPECIAL MASTER: That's going to be



1           irrelevant at this point, but you can ask.

2           THE VIDEOGRAPHER: It's going to be about  
3 eight minutes, seven minutes of change.

4           MR. SCAROLA: Hard for me to believe that  
5 but if the counter says what the counter says.

6           SPECIAL MASTER: The overtime got three  
7 minutes, let's go.

8                                   REDIRECT EXAMINATION

9 BY MS. BORJA:

10           Q. Before you were scheduled here under oath  
11 today by Mr. Scarola, did you talk to him in the break  
12 before that?

13           MS. MCCAWLEY: Objection to the extent you  
14 discussed privileged information with your lawyers  
15 you don't have to reveal.

16 BY MS. BORJA:

17           Q. I'm asking what she talked about with Mr.  
18 Scott?

19           MS. MCCAWLEY: She's in a joint defense  
20 agreement with Mr. Scarola.

21 BY MS. BORJA:

22           Q. Are you in a joint defense agreement with  
23 Mr. Scarola?

24           MR. SCAROLA: I will tell you that there is  
25 a joint defense, a common interest privilege

1 agreement between the witness and my clients, yes.

2 SPECIAL MASTER: Are you asserting that  
3 privilege then?

4 MR. SCAROLA: Yes, we are asserting that  
5 privilege and instructing the witness not to  
6 answer on the basis of the privilege that exists  
7 for Bradley Edwards and Professor Cassell.

8 SPECIAL MASTER: So with that I'm going to  
9 grant the motion similar to what I did the other  
10 day when Mr. Dershowitz was testifying and under  
11 the reservation that that can be dealt with later  
12 in front of the judge or in front of me, whichever  
13 you choose.

14 BY MS. BORJA:

15 Q. Now, I understand from your testimony that  
16 Mr. Edwards did not pressure you to give false  
17 information about this matter, is that fair?

18 A. That's fair.

19 Q. Tell me everything that Mr. Edwards told  
20 you about this matter?

21 MS. MCCAWLEY: Objection, that's privileged  
22 and she has not waived any privilege. She's not  
23 here testifying as to what she discussed with her  
24 lawyers.

25 SPECIAL MASTER: You know, it's an

1 interesting point. I'm going to grant your motion  
2 for privilege, but I'm going to suggest to you  
3 that there might be a strong argument to be made  
4 that those questions opened some of the door. I'm  
5 going to let the judge decide that. But you can  
6 go ahead, ask the questions, we'll put it on the  
7 record for later determination, and it's going to  
8 force, to be blunt, this among other things may  
9 force the witness to come back and complete the  
10 deposition. Just let's be aware of that.

11 MS. BORJA: And I can't make a proffer to  
12 all of my questions because some of them will  
13 depend on this witness' answers.

14 SPECIAL MASTER: I'm aware of that.

15 MS. BORJA: I want the record to be clear  
16 that although I'm being asked for a proffer, I'm  
17 constrained based on my inability to follow up.

18 SPECIAL MASTER: I understand that, but I'm  
19 sure that you have a couple questions that you'd  
20 like to proffer to give the record an idea of  
21 where you might have gone without restraint to  
22 what the answer might be and then a subsequent  
23 question might lead from the answer, I understand  
24 that.

25 BY MS. BORJA:

1 Q. Did Mr. Edwards ever suggest to you  
2 anything regarding Professor Dershowitz?

3 MS. MCCAWLEY: Objection. Hang on, I'm  
4 objecting. She's making a proffer and I need to  
5 make my objection on the record. Do not answer.  
6 Objection, attorney/client privilege.

7 SPECIAL MASTER: So I'm going to grant  
8 within the reservation it be brought back later.

9 BY MS. BORJA:

10 Q. Did Paul Cassell ever tell you anything  
11 about the topics that were covered in today's deposition?

12 MS. MCCAWLEY: Objection, attorney/client  
13 privilege.

14 SPECIAL MASTER: Same ruling.

15 BY MS. BORJA:

16 Q. Did anyone from Boise, Schiller ever tell  
17 you anything about the topics that were covered in  
18 today's deposition?

19 MS. MCCAWLEY: Objection, privileged work  
20 product.

21 SPECIAL MASTER: Same ruling.

22 BY MS. BORJA:

23 Q. Did Mr. Scarola ever tell you anything  
24 about the topics that were covered in today's deposition?

25 MS. MCCAWLEY: Objection, attorney/client

1 privilege.

2 SPECIAL MASTER: Same ruling.

3 BY MS. BORJA:

4 Q. Did the group that is Mr. Edwards, Mr.  
5 Cassell, Boise, Schiller, whether it's Ms. McCawley, or  
6 others or Jack Scarola ever tell you anything about  
7 Professor Dershowitz at all?

8 MS. MCCAWLEY: Objection, privileged  
9 information.

10 SPECIAL MASTER: To the extent it's  
11 privileged I'll grant the motion.

12 MS. MCCAWLEY: If you can answer that.

13 SPECIAL MASTER: To the extent it's  
14 privileged I'll grant the motion under the same  
15 reservation.

16 MS. MCCAWLEY: The question is, do you have  
17 any non-privileged information? You want to  
18 re-ask question.

19 A. I don't have any non-privileged  
20 information.

21 Q. Did they ever tell you anything before you  
22 retained them as counsel?

23 A. No.

24 Q. Did Mr. Edwards, Mr. Cassell, Boise,  
25 Schiller firm or Mr. SCAROLA ever tell you anything about

1 the circumstances of your sexual traffic, alleged sexual  
2 trafficking to other individuals such as foreign  
3 presidents?

4 MS. MCCAWLEY: Objection. That would be  
5 privileged.

6 SPECIAL MASTER: Same ruling.

7 BY MS. BORJA:

8 Q. Did the group that includes Mr. Edwards,  
9 Mr. Cassell, Boise Schiller, Mr. Scarola ever tell you  
10 anything with regard to any allegations of sexual abuse  
11 by Professor Dershowitz of other minors?

12 MS. MCCAWLEY: Objection. It would be  
13 privileged.

14 SPECIAL MASTER: I'm going to grand the  
15 same thing. Let me share with you in order to --  
16 I do think it's unfair to have them proffer  
17 virtually every question possible because it would  
18 depend upon the potential answer.

19 MS. MCCAWLEY: I understand.

20 SPECIAL MASTER: If the ruling comes down  
21 that this area of inquiry for whatever reason,  
22 waive of privilege or for whatever reason is  
23 allowed to be pursued then I'm going to provide  
24 Mr. Dershowitz and his team wide latitude to  
25 follow up on the questions should we re-set and

1 re-visit this.

2 MS. MCCAWLEY: I understand.

3 MR. SCAROLA: And we'll agree that the  
4 questions that have been asked adequately --

5 MR. SCOTT: That's what I wanted --

6 MR. SCAROLA: Yes, adequately establish a  
7 record for presentation to the Court.

8 MR. SCOTT: As long as Mr. Scarola and you  
9 agree, also, counsel?

10 MS. MCCAWLEY: Do I agree that they  
11 adequately established a record as to what you  
12 ruled that can be presented here, yes.

13 MR. SCOTT: Okay. So with that I think  
14 we're done.

15 MS. BORJA: We just need to confirm that  
16 the witness is going to following the instructions  
17 of her counsel; is that correct?

18 THE WITNESS: Yes.

19 MR. SCOTT: Thank you, Mr. Scarola.

20 SPECIAL MASTER: That short circuits it, I  
21 appreciate it. We're concluded.

22 MS. BORJA: Unless I'm allowed to conduct a  
23 cross examination about the pressure that her  
24 lawyers gave her and the circumstances of that  
25 pressure and what they told her.

1           SPECIAL MASTER: Well, obviously that would  
2           be subject to the area we just --

3           MS. BORJA: Then if that's --

4           SPECIAL MASTER: Anything else?

5           MS. BORJA: No. I just want the record to  
6           be clear that we've been precluded about cross  
7           examination about the exact scope of the  
8           examination from Mr. Scarola regarding pressure.

9           SPECIAL MASTER: Based upon what Mr.  
10          Scarola just agreed to and counsel just agreed to,  
11          I think that we have, and I think my rulings are  
12          also clear on the issue.

13          MR. SCOTT: I think we're done.

14          COURT REPORTER: Do you need this ordered?

15          MS. BORJA: Yes.

16          COURT REPORTER: Mr. Scarola, do you need a  
17          copy of this?

18          MR. SCAROLA: Yes.

19          THE VIDEOGRAPHER: That concludes the  
20          videotaped deposition. The time is 2:48 p.m.

21          (Thereupon, the deposition was concluded at  
22          2:48 p.m.)

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C E R T I F I C A T E O F O A T H

STATE OF FLORIDA,  
COUNTY OF DADE,

I, Deborah A. Harris, the undersigned  
authority and Notary Public certify that VIRGINIA ROBERTS  
GIUFFRE personally appeared before me and was duly sworn  
on the 16th day of January, 2016.

Sworn to before me this 20th day of  
January, 2016.

\_\_\_\_\_  
Deborah A. Harris, Court Reporter  
Notary Public - State of Florida  
My Commission No. FF 246867  
My Commission Expires: October 31, 2019  
Job No. J0277789

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REPORTER'S CERTIFICATE

I, Deborah A. Harris, Florida Professional Court Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages 1 through 216 are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not an attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

DATED this 20th day of January, 2016.

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Deborah A. Harris, Court Reporter  
Job No. J0277789

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DEPOSITION ERRATA SHEET

Assignment no: J0277789  
Bradley J. Edwards and Paul G. Cassell  
vs.  
Alan M. Dershowitz

\*\*

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my videotaped deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_.

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VIRGINIA ROBERTS GIUFFRE

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DEPOSITION ERRATA SHEET

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VIRGINIA ROBERTS GIUFFRE

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VIRGINIA ROBERTS GIUFFRE

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

**CONFIDENTIAL/SEALED DEPOSITION  
SPECIAL TREATMENT REQUIRED**

Sigrid S. McCawley, Esq.  
E-mail: [smccawley@bsfllp.com](mailto:smccawley@bsfllp.com)

February 10, 2016

**VIA E-MAIL & FEDERAL EXPRESS**

Esquire Solutions  
PRODUCTION DEPARTMENT  
101 Marietta Street  
Atlanta, Georgia 30303  
[errata@esquiresolutions.com](mailto:errata@esquiresolutions.com)

**Re: Confidential/Sealed Deposition Transcript, Job No. J02777789  
(Errata changes to be treated in same manner).**

To Whom It May Concern:

Attached please find the errata changes for the Videotaped Deposition of Virginia Roberts Giuffre taken January 16, 2016. This transcript has been designated as Confidential and has been sealed by the Court. Please ensure that all materials including transcript, errata changes and video tape are treated accordingly.

If you have any questions regarding the errata changes or treatment of confidential/sealed materials, please do not hesitate to contact me at (954) 356-0011.

Sincerely,



Sigrid S. McCawley

SSM:sp  
Enclosures

Confidential/Sealed Transcript Pursuant to Court Order  
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)  
Job No. J0277789

215

1 DEPOSITION ERRATA SHEET

2

3 Assignment no: J0277789

4 Bradley J. Edwards and Paul G. Cassell

5 vs.

6 Alan M. Dershowitz

7

\*\*

8 DECLARATION UNDER PENALTY OF PERJURY

9

10 I declare under penalty of perjury that I  
11 have read the entire transcript of my videotaped  
12 deposition taken in the captioned matter or the same has  
13 been read to me, and the same is true and accurate, save  
14 and except, for changes and/or corrections, if any, as  
15 indicated by me on the DEPOSITION ERRATA SHEET hereof,  
16 with the understanding that I offer these changes as if  
17 still under oath.

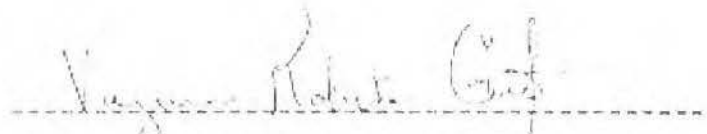
18

19 signed on the 11 day of February  
20 2016.

21

22

23



24

VIRGINIA ROBERTS GIUFFRE

25

Confidential/Sealed Transcript Pursuant to Court Order  
Vidiotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)  
Job No. J0277789

DEPOSITION ERRATA SHEET

Page No. 6 Line No. 17

Change to: "Yes. I signed the subpoena duces tecum."

Reason for change: Did not initially recognize the document

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Page No. 6 Line No. 20

Change to: "No. My lawyers worked with me to collect documents and my understanding is that we turned those documents over to Dershowitz's counsel prior to the deposition."

Reason for change: Clarification of answer

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Page No. 9 Line No. 9

Change to: "Yes."

Reason for change: Did not initially recognize the document

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Page No. 11 Line No. 1

Change to: "Yes."

Reason for change: Misunderstood the question

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Page 11 Line Nos. 4-5

Change to: "I'm confused. I don't know what foreign president you're talking about."

Reason for change: Misunderstood the question

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Page No. 11 Line No. 23

Change to: "I understand well-known prime ministers and other world leaders; as far as foreign presidents, I believe so."

Reason for change: Misunderstood the question

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Page No. 12 Line No. 2

Change to: "Yes, assuming South America is considered overseas."

Reason for change: Misunderstood the question

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Page No. 12 Line No. 8

Change to: "As far as I know right now, yes, I was."



Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)

Job No. J0277789

Reason for change: Misunderstood the question

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Page No. 38            Line No. 11

Change to: "I'll continue with the list here. Nadia Marcinkova I was not sent to her, but she was part of it with Jeff Epstein. Others on the list include Marvin Minsky and Tom Pritzker."

Reason for change: Clarification of answer

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Page 38            Line 19

Change to: "Off the top of my head, once, but it could have been more."

Reason for change: Clarification of answer

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Page No. 38            Line No. 21

Change to: "I believe Tom was at Mexico. I may have also been with him in other places."

Reason for change: Clarification of answer

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Page No. 41            Line No. 8

Change to: "On an airplane and in a limo."

Reason for change: Clarification of answer

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Page No. 41            Line No. 10

Change to: "One, each time."

Reason for change: Clarification of answer

-----  
Page No. 41            Line No. 12

Change to: "On airplane, blond, young."

Reason for change: Clarification of answer

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Page No. 98            Line No. 16

Change to: "As you can see in that answer I'm not even sure. It wasn't six months, but between six months and a year which is why I'm saying nine months. It was an assumption. It could have been six weeks."

Reason for change: Clarification of answer

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Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)

Job No. J0277789

Page No. 190

Line No. 22

Change to: "No, other than maybe you showing it to me today. It's in my pile. It's not in my pile, is it? I don't know. I haven't seen it. I was served with the subpoena, and I signed for it, and I reviewed it at that time."

Reason for change: Clarification of answer

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Page 191

Line 5

Change to: "Why would I do – no. I did collect documents and gave them to my lawyers in response to this subpoena. And my understanding is those documents were produced."

Reason for change: Misunderstood the question

---

Page 191

Line 20

Change to: "Yes, but I did not have any pictures of myself with Professor Dershowitz."

Reason for change: Misunderstood the question

**COMPOSITE  
EXHIBIT 1  
(Filed Under Seal)**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

\*\*CONFIDENTIAL\*\*

Videotaped deposition of GHISLAINE  
MAXWELL, taken pursuant to subpoena, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, 575 Lexington  
Avenue, New York, New York, commencing  
April 22, 2016, 9:04 a.m., on the above  
date, before Leslie Fagin, a Court  
Reporter and Notary Public in the State  
of New York.

- - -

MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026



Page 2

1  
2 APPEARANCES:  
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5 Fort Lauderdale, Florida, 33301  
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19 BY: JEFFREY S. PAGLIUCA, ESQUIRE  
LAURA A. MENNINGER, ESQUIRE  
20  
21 Also Present:  
22 James Christe, videographer  
23  
24  
25

Page 3

1  
2 THE VIDEOGRAPHER: We are now on  
3 the record and recording. This begins  
4 disk No. 1 in the deposition of  
5 Ghislaine Maxwell in the matter of  
6 Virginia Giuffre versus Ghislaine  
7 Maxwell in the U.S. District Court for  
8 the Southern District of New York.  
9 Today is April 22, 2016 the time is  
10 9:04 a.m.. This deposition is being  
11 taken at 575 Lexington Avenue in New  
12 York at the request of Sigrid McCawley  
13 of Boies Schiller & Flexner.  
14 The videographer is James Christe  
15 and the court reporter is Leslie Fagin.  
16 Will counsel state their appearance and  
17 whom they represent and then court  
18 reporter swear in Ms. Maxwell.  
19 MS. McCAWLEY: My name is Sigrid  
20 McCawley with my colleague Meredith  
21 Schultz. We are with Boies Schiller &  
22 Flexner. We represent Ms. Giuffre.  
23 MR. EDWARDS: Brad Edwards. I also  
24 represent Ms. Giuffre.  
25 MR. CASSELL: Paul Cassell, I also

Page 4

1 G Maxwell - Confidential  
2 represent Ms. Giuffre.  
3 MR. PAGLIUCA: Jeff Pagliuca and  
4 Laura Menninger on behalf of Ms.  
5 Maxwell.  
6 GHISLAINE MAXWELL, called  
7 as a witness, having been duly sworn by a  
8 Notary Public, was examined and testified as  
9 follows:  
10 EXAMINATION BY  
11 MS. McCAWLEY:  
12 Q. Good morning. I'm going to explain  
13 some of the rules that will happen with  
14 respect to depositions.  
15 Have you ever been deposed before?  
16 A. I have not.  
17 Q. What is going to happen here, we  
18 have a court reporter and a videographer.  
19 What they do is take down the words that we  
20 say so when I ask you a question they will  
21 record what you say in response to that. So  
22 we have to be mindful that in order for them  
23 to do their job we can't talk over each  
24 other.  
25 Another issue you have to be weary

Page 5

1 G Maxwell - Confidential  
2 of is that in a response, you can't give a  
3 nonverbal response, in other words, nodding a  
4 yes or no, they need to hear verbal response  
5 so they can record it on their transcript.  
6 So that's important for you to remember as we  
7 go through the day. If you forget, I will be  
8 sure to remind you.  
9 Is there anything that would  
10 prevent you from giving truthful testimony  
11 today?  
12 A. There is not.  
13 Q. You are not on any medications or  
14 anything that would inhibit your ability to  
15 remember or give truthful testimony?  
16 A. I am not.  
17 MR. PAGLIUCA: Could you identify  
18 the assistant in the room.  
19 MS. McCAWLEY: This is Emma Rosen  
20 from our New York office. She is a  
21 paralegal.  
22 Q. Ms. Maxwell, can you please state  
23 your address for the record?  
24 A. Currently [REDACTED]  
25 Q. What is your date of birth?

Page 6

1 G Maxwell - Confidential  
 2 A. [REDACTED]  
 3 Q. When did you first recruit a female  
 4 to work for Mr. Epstein?  
 5 MR. PAGLIUCA: I object to the form  
 6 and foundation of the question. I  
 7 believe this is confidential  
 8 information. I ask anyone who is not  
 9 admitted in this case be excused from  
 10 the room, please.  
 11 MS. McCAWLEY: So the response to  
 12 that question would --  
 13 MR. PAGLIUCA: The subject matter  
 14 of this question is confidential and I'm  
 15 designating it as confidential.  
 16 MS. McCAWLEY: I just want to make  
 17 that clear for the record.  
 18 MR. EDWARDS: So we don't delay the  
 19 deposition I will step out of the room  
 20 but I think it's important to lay the  
 21 record that --  
 22 MR. PAGLIUCA: I'm sorry, you are  
 23 not admitted in this proceeding so you  
 24 are not entitled to make any record. If  
 25 Ms. McCawley wants to make a record she

Page 7

1 G Maxwell - Confidential  
 2 can.  
 3 MR. EDWARDS: I can make a record  
 4 right now.  
 5 MR. PAGLIUCA: Maybe we should get  
 6 the judge on the phone and talk about  
 7 it.  
 8 MR. EDWARDS: The record will be  
 9 short. This is the precise reason why  
 10 Ms. Giuffre wants me in this case and  
 11 I'm unable to effectively represent her  
 12 at this time because I am unable to have  
 13 access to the confidential information  
 14 which includes apparently the entire  
 15 deposition of Ms. Maxwell. But for the  
 16 sake of not further delaying this, I  
 17 will be outside the room.  
 18 MS. McCAWLEY: Thank you.  
 19 A. I would like to just -- wait for  
 20 him to leave.  
 21 Q. That's fine.  
 22 A. I would just like to clarify the  
 23 address. I'm in the process of selling the  
 24 house so while while I still receive mail  
 25 there, it's not my actual physical address.

Page 8

1 G Maxwell - Confidential  
 2 It's in the process of being sold. It still  
 3 requires some final paperwork to be done, so  
 4 just for the purposes of clarity.  
 5 Q. Do you have a new address where you  
 6 will be living?  
 7 A. I do not.  
 8 Q. For the purpose of the record, if  
 9 there is something I ask you that you later  
 10 remember something else or need to correct  
 11 your testimony in some way, you can do that,  
 12 just let me know what it is and we will go  
 13 back to that question and can you clarify.  
 14 A. Of course. I just wanted to be  
 15 clear, there is still some paperwork pending  
 16 for final release, but it's in the process of  
 17 sale. But I don't have another address  
 18 currently, so whilst that should still be of  
 19 record that the mail could be forwarded  
 20 there, so for purposes of clarity I wanted to  
 21 be clear.  
 22 Q. I appreciate that.  
 23 So Ms. Maxwell, when did you first  
 24 recruit a female to work for Mr. Epstein?  
 25 MR. PAGLIUCA: Again. I object to

Page 9

1 G Maxwell - Confidential  
 2 form and foundation of the question.  
 3 Q. You can answer the question.  
 4 A. First of all, can you please  
 5 clarify the question. I don't understand  
 6 what you mean by female, I don't understand  
 7 what you mean by recruit. Please be more  
 8 clear and specific about what you are  
 9 suggesting.  
 10 Q. Are you a female, is that the sex  
 11 that you are?  
 12 A. I am a female.  
 13 Q. That's what I'm referring to a  
 14 female and I'm asking you when you first, the  
 15 very first time you recruited a female to  
 16 work for Mr. Epstein?  
 17 A. Again, I don't understand what  
 18 female -- I am a 54 year old women.  
 19 Q. I'm not making it age, any age of a  
 20 female that you recruited to work for Mr.  
 21 Epstein?  
 22 A. Again, I was somebody who hired a  
 23 number of people to work for Mr. Epstein and  
 24 hiring is one of my functions.  
 25 Q. And when is the first time you

Page 10

1 G Maxwell - Confidential  
 2 hired someone to work for Mr. Epstein, a  
 3 female?  
 4 A. As best as I can recollect, a woman  
 5 the age probably of about 40 or 50 was in  
 6 sometime in 1992.  
 7 Q. How long did you work for Mr.  
 8 Epstein?  
 9 A. I started working for him at some  
 10 point in 1992 and the nature of my work  
 11 relationship with him changed over time so  
 12 from around 2002, 2003, the work lessened  
 13 considerably.  
 14 Q. When did you --  
 15 MR. PAGLIUCA: Can I interject for  
 16 a moment. If we are talking about  
 17 background --  
 18 MS. McCAWLEY: I'm in the middle of  
 19 a question. Let me finish it and then  
 20 can you interject.  
 21 Q. When you say 2002 to 2003 that the  
 22 work lessened, when did you complete working  
 23 for Mr. Epstein; when was the last time you  
 24 were employed by him, the last date?  
 25 A. I believe I still was doing --

Page 11

1 G Maxwell - Confidential  
 2 helping him in a very nominal way, maybe an  
 3 hour or two a year at sometime 2008 and 2009.  
 4 MR. PAGLIUCA: So if you are going  
 5 to be talking about general background,  
 6 I don't need to designate that as  
 7 confidential. So if you want to have  
 8 them come back in, that's fine.  
 9 I assumed by your first question  
 10 you were going into more sensitive  
 11 areas. I will leave it up to you, but  
 12 if this is general background it will  
 13 not be designated as confidential.  
 14 MS. McCAWLEY: I appreciate that.  
 15 I will jump back into my other  
 16 questions.  
 17 MR. PAGLIUCA: So we will keep it  
 18 as confidential.  
 19 Q. When you were first employed by him  
 20 in 1992, what were you hired to do?  
 21 A. First, I was consulting and what I  
 22 did was I helped with decorating houses and  
 23 in hiring staff to help run those houses.  
 24 Q. Did your duties change over the  
 25 course of 1992 to 2009?

Page 12

1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation.  
 4 A. My job entailed running the homes  
 5 that he had but much more importantly, most  
 6 of the houses had construction and so whilst  
 7 in 1992 there was no construction project,  
 8 there was construction projects that began  
 9 after that time and I was in charge not only  
 10 of hiring architects, I was also in charge of  
 11 all the filings or overseeing that, like a  
 12 general contractor would.  
 13 I also helped with hiring the  
 14 architects, hiring the builders, reviewing  
 15 the contracts for the builders, coordinating  
 16 the building projects, coordinating how the  
 17 projects would layout, the timing of the  
 18 projects and all the various materials that  
 19 they would require to run a very substantial  
 20 building project. That's the nature of the  
 21 job I was dealing with.  
 22 Q. How old was the youngest female you  
 23 ever hired to work for Jeffrey?  
 24 MR. PAGLIUCA: Object to the form  
 25 and foundation.

Page 13

1 G Maxwell - Confidential  
 2 Q. You can answer.  
 3 A. I have not any idea exactly of the  
 4 youngest adult employee that I hired for  
 5 Jeffrey.  
 6 Q. When you say adult employee, did  
 7 you ever hire someone that was under the age  
 8 of 18?  
 9 A. Never.  
 10 Q. Did you ever bring someone who was  
 11 under -- invite someone under the age of 18  
 12 to Jeffrey's home, any of his homes?  
 13 MR. PAGLIUCA: Object to the form  
 14 foundation.  
 15 A. Can you repeat the question?  
 16 Q. Did you ever invite anybody who was  
 17 under the age of 18 to Jeffrey's homes?  
 18 MR. PAGLIUCA: Same objections.  
 19 A. I have a number of friends that  
 20 have children and friends of mine that have  
 21 kids and in the invitation of my friends and  
 22 their kids, I'm sure I may have invited some  
 23 of my friend's kids to come.  
 24 Q. Anybody that is not a friend of  
 25 yours.

Page 14

1 G Maxwell - Confidential  
 2 Any female under the age of 18, did  
 3 you invite them to come to Jeffrey's home?  
 4 MR. PAGLIUCA: Object to the form  
 5 and foundation.  
 6 A. Again, as I said, I am not aware of  
 7 inviting anybody other than friends of mine  
 8 who have children to the house.  
 9 Q. Did you invite Virginia Giuffre to  
 10 come to Jeffrey Epstein's home when she was  
 11 under the age of 18?  
 12 MR. PAGLIUCA: Object to the form  
 13 and foundation.  
 14 A. Virginia Roberts held herself out  
 15 as a masseuse and invited herself to come and  
 16 give a massage.  
 17 Q. My question is, did you invite  
 18 Virginia Roberts when she was under the age  
 19 of 18 to come to Jeffrey Epstein's home?  
 20 MR. PAGLIUCA: Object to the form  
 21 and foundation.  
 22 A. Again, Virginia Roberts was a  
 23 masseuse --  
 24 Q. I'm asking not asking if she was a  
 25 masseuse. I'm asking if you invited her to

Page 15

1 G Maxwell - Confidential  
 2 come to Jeffrey Epstein's home?  
 3 A. Again, there would be no course to  
 4 have a conversation with Virginia unless she  
 5 held herself out to be a masseuse.  
 6 Q. I'm not asking that question. I'm  
 7 asking if you invited her to come to Jeffrey  
 8 Epstein's home when she was under the age of  
 9 18?  
 10 A. Again, I repeat, she was a masseuse  
 11 and in the form and as my job, I was to have  
 12 people who he wanted for various things  
 13 including massage. She came as a masseuse.  
 14 Q. So you invited her to his home to  
 15 come to give a massage, is that correct?  
 16 MR. PAGLIUCA: Object to the form  
 17 and foundation. Misstates the witness'  
 18 testimony.  
 19 A. Again, I did not invite Virginia  
 20 Roberts. She came as a masseuse.  
 21 Q. She who invited her to come as a  
 22 masseuse, she just showed up at the front  
 23 door?  
 24 MR. PAGLIUCA: Object to the form  
 25 and foundation.

Page 16

1 G Maxwell - Confidential  
 2 A. Ms. Roberts held herself out --  
 3 Q. I'm not asking how she held herself  
 4 out. I'm asking how she arrived at the home.  
 5 Did you meet her and invite her to come to  
 6 the home or how did she arrive there?  
 7 MR. PAGLIUCA: Object to the form  
 8 and foundation.  
 9 A. Ms. Roberts held her to be a  
 10 masseuse and her mother drove her to the  
 11 house.  
 12 Q. When did you first meet Virginia  
 13 Roberts?  
 14 A. I don't have a recollection of the  
 15 first meeting.  
 16 Q. Do you recall meeting her at  
 17 Mar-a-Lago?  
 18 A. Like I said, I don't have a  
 19 recollection of meeting Ms. Roberts.  
 20 Q. So you recall Ms. Roberts being  
 21 brought to the home by her mother, is that  
 22 your testimony?  
 23 A. That is my testimony.  
 24 Q. And that is the first time you met  
 25 her?

Page 17

1 G Maxwell - Confidential  
 2 A. Like I said, I don't recall meeting  
 3 her the first time. I do remember her mother  
 4 bringing her to the house.  
 5 Q. Are you a member at Mar-a-Lago?  
 6 A. No.  
 7 Q. Have you visited Mar-a-Lago?  
 8 A. Yes.  
 9 Q. Did you visit Mar-a-Lago in the  
 10 year 2000?  
 11 A. I'm pretty sure I did.  
 12 Q. When Ms. Roberts arrived at the  
 13 home with her mother, what happened?  
 14 A. I spoke to her mother outside of  
 15 the house and she -- what I don't recall is  
 16 exactly what happened because I was talking  
 17 to her mother the entire she was in the  
 18 house.  
 19 Q. Did you introduce Ms. Roberts to  
 20 Jeffrey Epstein?  
 21 A. I don't recall how she actually met  
 22 Mr. Epstein. As I said, I spoke to her  
 23 mother the entire time outside the house.  
 24 Q. Did you walk Ms. Roberts up to the  
 25 upstairs location at the Palm Beach house to



Page 18

1 G Maxwell - Confidential  
 2 meet Mr. Epstein?  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 Q. You can answer.  
 6 A. I just explained.  
 7 A. I spent the entire time talking to  
 8 Virginia's mother outside the house so the  
 9 answer to the question is no.  
 10 Q. No, did you not walk her up and  
 11 introduce her to Mr. Epstein?  
 12 A. I just said no.  
 13 Q. Did you participate in a massage  
 14 this first time when she first came to the  
 15 home and you were speaking with her mother,  
 16 she was in the home, is that correct, you  
 17 brought her into the home?  
 18 MR. PAGLIUCA: Object to the form  
 19 and foundation.  
 20 A. I will repeat again, I was standing  
 21 outside with her mother so very difficult for  
 22 me to do anything else at that time so no, I  
 23 did not take her upstairs.  
 24 Q. Did you participate --  
 25 A. Virginia lied 100 percent about

Page 19

1 G Maxwell - Confidential  
 2 absolutely everything that took place in that  
 3 first meeting. She has lied repeatedly,  
 4 often and is just an awful fantasist. So  
 5 very difficult for anything to take place  
 6 that she repeated because I was with her  
 7 mother the entire time.  
 8 Q. So did you have -- did you give a  
 9 massage with Virginia Roberts and Mr. Epstein  
 10 during the first time Virginia Roberts was at  
 11 the West Palm Beach house?  
 12 MR. PAGLIUCA: Object to the form  
 13 and foundation.  
 14 Q. Yes or no?  
 15 A. No.  
 16 Q. Have you ever given a massage with  
 17 Virginia Roberts in the room and Jeffrey  
 18 Epstein?  
 19 MR. PAGLIUCA: Object to the form  
 20 and foundation.  
 21 A. No.  
 22 Q. Have you ever given Jeffrey Epstein  
 23 a massage?  
 24 MR. PAGLIUCA: Object to the form,  
 25 foundation. And I'm going to instruct

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1 G Maxwell - Confidential  
 2 you not to answer that question. I  
 3 don't have any problem with you asking  
 4 questions about what the subject matter  
 5 of this lawsuit is, which would be, as  
 6 you've termed it, sexual trafficking of  
 7 Ms. Roberts.  
 8 To the extent you are asking for  
 9 information relating to any consensual  
 10 adult interaction between my client and  
 11 Mr. Epstein, I'm going to instruct her  
 12 not to answer because it's not part of  
 13 this litigation and it is her private  
 14 confidential information, not subject to  
 15 this deposition.  
 16 MS. McCAWLEY: You can instruct her  
 17 not to answer. That is your right. But  
 18 I will bring her back for another  
 19 deposition because it is part of the  
 20 subject matter of this litigation so she  
 21 should be answering these questions.  
 22 This is civil litigation, deposition and  
 23 she should be responsible for answering  
 24 these questions.  
 25 MR. PAGLIUCA: I disagree and you

Page 21

1 G Maxwell - Confidential  
 2 understand the bounds that I put on it.  
 3 MS. McCAWLEY: No, I don't. I will  
 4 continue to ask my questions and you can  
 5 continue to make your objections.  
 6 Q. Did you ever participate from the  
 7 time period of 1992 to 2009, did you ever  
 8 participate in a massage with Jeffrey Epstein  
 9 and another female?  
 10 MR. PAGLIUCA: Objection. Do not  
 11 answer that question. Again, to the  
 12 extent you are asking for some sort of  
 13 illegal activity as you've construed in  
 14 connection with this case I don't have  
 15 any problem with you asking that  
 16 question. To the extent these questions  
 17 involve consensual acts between adults,  
 18 frankly, they're none of your business  
 19 and I will instruct the witness not to  
 20 answer.  
 21 MS. McCAWLEY: This case involves  
 22 sexual trafficking, sexual abuse,  
 23 questions about her having interactions  
 24 with other females is relevant to this  
 25 case. She needs to answer these

Page 22

1 G Maxwell - Confidential  
 2 questions.  
 3 MR. PAGLIUCA: I'm instructing her  
 4 not to answer.  
 5 MS. McCAWLEY: Then we will be back  
 6 here again.  
 7 Q. Have you ever given a massage to  
 8 Mr. Epstein with a female that was under the  
 9 age of 18?  
 10 A. Can you repeat the question?  
 11 Q. Yes. Have you ever given a massage  
 12 to Mr. Epstein with a female that was under  
 13 the age of 18?  
 14 A. No.  
 15 Q. Have you ever observed Mr. Epstein  
 16 having a massage given by an individual, a  
 17 female, who was under the age of 18?  
 18 A. No.  
 19 Q. Have you ever observed females  
 20 under the age of 18 in the presence of  
 21 Jeffrey Epstein at his home?  
 22 MR. PAGLIUCA: Object to the form  
 23 and foundation.  
 24 A. Again, I have friends that have  
 25 children --

Page 23

1 G Maxwell - Confidential  
 2 Q. I'm not talking about friends. I'm  
 3 talking about individuals --  
 4 MR. PAGLIUCA: I'm going to object  
 5 to you interrupting the witness who was  
 6 answering your question. The question  
 7 was, have you ever seen anyone, female  
 8 under the age of 18 at the house and  
 9 that's the question she was answering.  
 10 If you want to strike that question and  
 11 ask another question, feel free, but let  
 12 the witness respond, please.  
 13 MS. McCAWLEY: I will do that.  
 14 Q. Have you ever observed a female  
 15 under the age of 18 at Jeffrey Epstein's home  
 16 that was not a friend, a child -- one of your  
 17 friend's children?  
 18 A. Again, I can't testify to that  
 19 because I have no idea what you are talking  
 20 about.  
 21 Q. You have no idea what I'm talking  
 22 about in the sense you never observed a  
 23 female under the age of 18 at Jeffrey  
 24 Epstein's home that was not one of your  
 25 friend's children, is that correct?

Page 24

1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation.  
 4 A. How would I possibly know how  
 5 someone is when they are at his house. You  
 6 are asking me to do that. I cannot possibly  
 7 testify to that. As far as I'm concerned,  
 8 everyone who came to his house was an adult  
 9 professional person.  
 10 Q. Are you familiar with the police  
 11 report that was issued in respect to the  
 12 investigation in this matter?  
 13 MR. PAGLIUCA: Object to the form  
 14 and foundation.  
 15 Q. Are you familiar with the police  
 16 report that was used in this matter, the  
 17 investigation of Jeffrey Epstein, has been  
 18 produced as a document in this matter?  
 19 A. I have seen a police report.  
 20 (Maxwell Exhibit 1, police report,  
 21 marked for identification.)  
 22 Q. The police report that you have in  
 23 front of you, can you turn to page 28 of that  
 24 report, the numbers are on the top right-hand  
 25 corner.

Page 25

1 G Maxwell - Confidential  
 2 You will see some redactions in  
 3 this report, Ms. Maxwell, the redacted  
 4 information is redacted because it reveals  
 5 the name of a minor, someone who is under the  
 6 age of 18.  
 7 On page 28, in the third paragraph,  
 8 about halfway down, it says, Roberts stated  
 9 she performed the massage naked. At the  
 10 conclusion of this massage, Epstein paid  
 11 RobSON \$200 for the massage. He explained, I  
 12 know you are not comfortable put I will pay  
 13 you if you bring some girls. He told her the  
 14 younger the better. Robson stated once tried  
 15 to bring a 23 year old to Epstein and he  
 16 stated the female was too old.  
 17 Have you heard Mr. Epstein use the  
 18 phrase the younger the better?  
 19 A. I have no recollection of hearing  
 20 that.  
 21 Q. Have you used the phrase in talking  
 22 to Ms. Roberts and asking her to recruit  
 23 females for Mr. Epstein, the younger the  
 24 better?  
 25 MR. PAGLIUCA: Object to the form

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1 G Maxwell - Confidential  
 2 and foundation of the question.  
 3 A. First of all, can you break the  
 4 question apart.  
 5 Q. Have you used the phrase the  
 6 younger the better in speaking to Ms. Roberts  
 7 and asking her to recruit females for Jeffrey  
 8 Epstein?  
 9 MR. PAGLIUCA: Object to the form  
 10 and foundation.  
 11 Q. You can answer. It's yes or no.  
 12 A. No, that's absolutely not true, on  
 13 the second part of your question, I have not  
 14 asked Virginia to recruit females and the  
 15 first part of your question, if you can  
 16 repeat that again, the question you asked.  
 17 Q. Will you read back the question.  
 18 (Record read.)  
 19 A. I believe I answered the later part  
 20 of the question. The first part of the  
 21 question, it's impossible for me to recall  
 22 events that took place 16 years ago but it  
 23 doesn't sound like something I would say.  
 24 Q. On page 28, that same paragraph,  
 25 Roberts was asked how many girls in total she

Page 27

1 G Maxwell - Confidential  
 2 brought to Epstein. Robson stated that she  
 3 can remember, Robson stated that she brought  
 4 and, it's redacted there, and the victim in  
 5 this case.  
 6 Let me ask my question, I have a  
 7 question pending right now.  
 8 Are you testifying that you are  
 9 unaware of any underage, under the age of 18,  
 10 females coming to Jeffrey Epstein's home to  
 11 perform massages?  
 12 MR. PAGLIUCA: Object to the form  
 13 foundation.  
 14 A. You need to straddle that question  
 15 in a different time period. When I was  
 16 there, at the time I was present, the people  
 17 that gave Jeffrey, men and women who gave  
 18 Jeffrey massages were adults over the age of  
 19 18.  
 20 Q. Never in your time at any of  
 21 Jeffrey Epstein's homes were you present when  
 22 a female under the age of 18 was there to  
 23 give Jeffrey Epstein a massage?  
 24 MR. PAGLIUCA: Object to the form  
 25 and foundation.

Page 28

1 G Maxwell - Confidential  
 2 A. First of all, as I said when I was  
 3 present --  
 4 Q. It is a yes or no.  
 5 A. No, it is not.  
 6 Q. You can answer the question in full  
 7 but please provide yes or no as an initial  
 8 matter.  
 9 A. I cannot answer yes or no, it's not  
 10 bounded by time. It's entirely possible I  
 11 could have been in a room or even in the  
 12 vicinity of Palm beach when somebody came and  
 13 I would not know. How would I know when  
 14 somebody was in the house. There is no way I  
 15 can know.  
 16 Q. Did you stay at Jeffrey Epstein's  
 17 home when you were in Palm Beach?  
 18 A. Most of the time.  
 19 Q. So how is it that you wouldn't know  
 20 if there was a female in the home under the  
 21 age of 18 if you were staying there?  
 22 A. Well, first of all, when I was  
 23 staying there, the house is actually quite  
 24 large and I have a very busy job and I had an  
 25 office with a door so the door would be shut

Page 29

1 G Maxwell - Confidential  
 2 and I would be working. I'm not responsible  
 3 for what Jeffrey does and I don't always pay  
 4 attention to what happens in the house. I'm  
 5 very busy.  
 6 Q. So you're testifying that you never  
 7 observed a female under the age of 18 at  
 8 Jeffrey Epstein's West Palm Beach home?  
 9 MR. PAGLIUCA: Object to the form  
 10 and foundation.  
 11 A. I already answered that question, I  
 12 believe.  
 13 Q. You didn't answer my question.  
 14 A. I did.  
 15 Q. Did you observe a female under the  
 16 age of 18 at Jeffrey Epstein's home in Palm  
 17 Beach?  
 18 A. Like I said, I work, I don't sit  
 19 there and watch people coming in and out of  
 20 the house. I cannot possibly tell you if I'm  
 21 in the home that somebody was there that I  
 22 did not see, I cannot comment on it, I have  
 23 no idea.  
 24 Q. Did you observe females at Jeffrey  
 25 Epstein's home that were laying out topless

Page 30

1 G Maxwell - Confidential  
 2 in the back of the home, in other words  
 3 without a shirt on?  
 4 A. So that's just another of  
 5 Virginia's lies. So let's be clear, at the  
 6 time when I was there and present, frequently  
 7 at the house, it was unusual to see people  
 8 without their clothes on.  
 9 Q. When you say unusual, did you  
 10 observe people without their clothes at  
 11 Jeffrey Epstein's home?  
 12 A. Can I answer. Sometimes people in  
 13 the privacy of a house and swimming pool, I  
 14 have seen people from time to time take their  
 15 top off. I have seen people from time to  
 16 time do that. Very unusual. Naked people  
 17 around the people at any frequent period of  
 18 time, I have never seen.  
 19 Q. Were they under the age of 18?  
 20 A. As I was saying, people when I was  
 21 in the house, were of adult age, if they were  
 22 children, friends of my family or friends  
 23 that were there, they may well have been  
 24 because I have nieces and nephews under the  
 25 age of 18, I cannot testify to anybody else

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1 G Maxwell - Confidential  
 2 -- just another one of Virginia's many  
 3 fictitious lies and stories to make this a  
 4 salacious event to get interest and press.  
 5 It's absolute rubbish.  
 6 Q. Were you in charge of hiring  
 7 individuals to provide massages for Jeffrey  
 8 Epstein?  
 9 A. My job included hiring many people.  
 10 There were six homes. As I sit here, I hired  
 11 assistants, I hired architects, I hired  
 12 decorators, I hired cooks, I hired cleaners,  
 13 I hired gardeners, I hired pool people, I  
 14 hired pilots, I hired all sorts of people.  
 15 In the course and a very small part  
 16 of my job was from from time to time to find  
 17 adult professional massage therapists for  
 18 Jeffrey.  
 19 Q. When you say adult professional  
 20 massage therapists, where did you find these  
 21 massage therapists?  
 22 A. From time to time I would visit  
 23 professional spas, I would receive a massage  
 24 and if the massage was good I would ask that  
 25 man or woman if they did home visits.

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1 G Maxwell - Confidential  
 2 Q. Did you ever hire a masseuse that  
 3 was under the age of 18?  
 4 MR. PAGLIUCA: Object to the form  
 5 and foundation.  
 6 Q. Did you?  
 7 A. Again, I don't hire massage  
 8 therapists, so that was not my job.  
 9 Q. You just said you did, you just  
 10 said you hired massage therapists for Jeffrey  
 11 Epstein, I'm asking if you hired a massage  
 12 therapist who was under the age of 18?  
 13 A. Let me correct myself. When I  
 14 meant hire, I didn't mean hire in the way you  
 15 are doing it. What I say is that I went to  
 16 spas and I met people and if they did home  
 17 visits, Jeffrey would then, in fact, hire  
 18 them. I'm not responsible for hiring  
 19 someone. And they were not full-time, so  
 20 it's not a correct characterization.  
 21 Q. Did you ever, your term is meet,  
 22 did you ever meet a person that was under the  
 23 age of 18 that you -- that Jeffrey then hired  
 24 as a masseuse?  
 25 MR. PAGLIUCA: Object to the form

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1 G Maxwell - Confidential  
 2 and foundation.  
 3 A. First of all, Virginia Roberts who  
 4 you are referring to was a masseuse aged 17,  
 5 we all now know, so your story that you keep  
 6 pushing out to the press that she was a 15  
 7 year old -- you and I both know was a lie,  
 8 correct.  
 9 Q. You are not sentencing my question.  
 10 A. You and I both know that was a lie,  
 11 correct.  
 12 Q. You are not answering my question.  
 13 I'm asking you whether you ever met a female  
 14 under the age of 18 that Jeffrey then hired  
 15 as a masseuse?  
 16 MR. PAGLIUCA: Object to the form  
 17 and foundation.  
 18 A. The only person I can talk about  
 19 who clearly was a massage age 17, a masseuse,  
 20 was Virginia.  
 21 Q. Did you meet her and then introduce  
 22 her to Jeffrey?  
 23 A. I don't know. I already testified  
 24 I don't recall meeting her.  
 25 (Maxwell Exhibit 2, email, marked

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1 G Maxwell - Confidential  
 2 for identification.)  
 3 Q. So I'm showing you a document that  
 4 we have marked as Maxwell Exhibit 2. It's a  
 5 document you produced in this matter labeled  
 6 confidential GM 00109. It's dated Sunday  
 7 June 12, 2011. It's from Jeffrey Epstein to  
 8 you. If you can turn to page 4 -- sorry, can  
 9 you turn to the first page, the cover page  
 10 initially which is 00109. If you look under  
 11 the time stamp it says, June 12, 2011 at 4:12  
 12 p.m., it says [REDACTED]  
 13 Is that your email address?  
 14 A. It is.  
 15 Q. Under that it says, Thank you. I  
 16 have it now and I'm working on a letter, a  
 17 little, I will send the final version  
 18 tomorrow and what ever it is will be  
 19 factually accurate.  
 20 Do you see that on page 1?  
 21 A. I do.  
 22 Q. Then I would like you to turn to  
 23 page 4 please. The second paragraph down on  
 24 page 4, it states, After some thought, I  
 25 recall that I first met Ms. Roberts when she

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1 G Maxwell - Confidential  
 2 was working at a premier resort claiming to  
 3 be 18 years old and a professional masseuse?  
 4 MR. PAGLIUCA: What line are you  
 5 on, counsel.  
 6 MS. McCAWLEY: Second paragraph  
 7 down.  
 8 MR. PAGLIUCA: I got it.  
 9 Q. Is that a statement that you wrote?  
 10 A. It appears to be.  
 11 Q. So does that correct your testimony  
 12 that you did meet Ms. Roberts at Mar-a-Lago?  
 13 A. Again, this was written in, when  
 14 were you saying?  
 15 Q. 2011.  
 16 A. So by 2011, Ms. Roberts had already  
 17 perpetrated so many lies and stories it's  
 18 hard for me to accurately tell you today what  
 19 I remember back then. As I sit here today,  
 20 the testimony I give you today, I do not  
 21 recollect it.  
 22 Q. Do you have a reason to say that  
 23 this document that you wrote is incorrect?  
 24 A. It's in 2011, I can't possibly tell  
 25 you what I remember in 2011.

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1 G Maxwell - Confidential  
 2 Q. Are you questioning that this  
 3 document is incorrect, this document -- this  
 4 email that you wrote?  
 5 A. I wrote an email. I was trying to  
 6 be accurate, so who knows, with all the  
 7 rubbish that you guys have put out in the  
 8 press that I read, maybe in the moment I  
 9 wrote it a memory came to me that I don't  
 10 know, but as I sit here today and the  
 11 testimony I gave you today is I don't  
 12 recollect it.  
 13 Q. Does this refresh your recollection  
 14 that you recalled meeting Ms. Roberts at  
 15 Mar-a-Lago?  
 16 A. It does not.  
 17 Q. So your testimony today is that you  
 18 don't remember meeting Ms. Roberts at  
 19 Mar-a-Lago?  
 20 A. I do not.  
 21 I just want to clarify, when you  
 22 read so much stuff and so much rubbish that  
 23 comes out from Virginia Roberts, you don't  
 24 know what's up and down, at the time I wrote  
 25 this I believe I had a memory but as I sit

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1 G Maxwell - Confidential  
 2 here today I do not.  
 3 Q. Ms. Maxwell, when did you first  
 4 meet [REDACTED]  
 5 MR. PAGLIUCA: Object to the form  
 6 and foundation.  
 7 A. I have no idea when I met her.  
 8 Q. Do you know how old she was when  
 9 you met her?  
 10 A. I have no idea how old she was when  
 11 I met her.  
 12 Q. Is it possible she was 13 years old  
 13 when you first met her?  
 14 MR. PAGLIUCA: Object to the form  
 15 and foundation.  
 16 A. [REDACTED] was Jeffrey's friend  
 17 and [REDACTED]  
 21 Q. I understand [REDACTED]  
 22 [REDACTED]  
 23 I'm asking if [REDACTED] was 13  
 24 years old when you first met her?  
 25 A. I have no idea.

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1 G Maxwell - Confidential  
 2 Q. Was she under 18 when you first met  
 3 her?  
 4 A. I have no idea how old she was when  
 5 I first met her.  
 6 Q. Did she look like a child when you  
 7 first met her?  
 8 A. I don't remember what she looked  
 9 like at the time she was in the house.  
 10 Q. How many years have you known her?  
 11 A. I can only recall the last time I  
 12 saw her.  
 13 Q. When was the first time you met  
 14 her?  
 15 A. Again, I just told you, I don't  
 16 recall the first time I met her.  
 17 Q. Did [REDACTED] travel with you  
 18 on Jeffrey's planes?  
 19 A. I wouldn't remember if [REDACTED] was on  
 20 the plane or not.  
 21 Q. Did you ever have sex with [REDACTED]  
 22 [REDACTED]  
 23 A. No.  
 24 Q. Did you ever observe Jeffrey having  
 25 sex with [REDACTED] [REDACTED]

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1 G Maxwell - Confidential  
 2 A. No.  
 3 Q. Were you aware that Jeffrey was  
 4 having sexual contact with [REDACTED] when  
 5 she was 13 years old?  
 6 MR. PAGLIUCA: Object to the form  
 7 and foundation.  
 8 A. I would be very shocked and  
 9 surprised if that were true.  
 10 Q. Were you in the house when [REDACTED]  
 11 [REDACTED] was in the house in a private area  
 12 with Jeffrey Epstein?  
 13 MR. PAGLIUCA: Object to the form  
 14 and foundation.  
 15 A. Can you repeat the question.  
 16 Q. Were you ever in the Palm Beach  
 17 house when Jeffrey Epstein was in the house  
 18 with [REDACTED]  
 19 MR. PAGLIUCA: Object to the form  
 20 and foundation.  
 21 A. I've already testified that I have  
 22 met her and that she was there [REDACTED]  
 23 [REDACTED] I don't understand what your  
 24 question is asking.  
 25 Q. So you have never seen [REDACTED]

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1 G Maxwell - Confidential  
 2 [REDACTED]  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 Q. Is that your testimony?  
 6 A. I already said I don't recall all  
 7 the times I've seen her and I have no memory  
 8 of that.  
 9 Q. Have you ever seen [REDACTED] in  
 10 the house with Jeffrey Epstein [REDACTED]  
 11 [REDACTED]  
 12 MR. PAGLIUCA: Object to the form  
 13 and foundation.  
 14 A. I just told you I don't recall  
 15 seeing [REDACTED]  
 16 Q. Were you ever involved in an orgy  
 17 with [REDACTED]  
 18 A. No, absolutely not.  
 19 Q. Can you tell me, do you know an  
 20 individual by the name of Nadia Marcinkova?  
 21 A. I do.  
 22 Q. How did you meet Nadia Marcinkova?  
 23 A. At some point she was a friend of  
 24 Jeffrey's and I recall meeting her at some  
 25 point.

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1 G Maxwell - Confidential  
 2 Q. Did you hire her?  
 3 A. First of all, I don't hire girls  
 4 like that, so let's be clear, I already  
 5 testified to that, and I have no idea what  
 6 you are referring to.  
 7 Q. When you say girls like that, what  
 8 do you mean?  
 9 A. I hire people who are professional  
 10 at the house. You are asking if I hired  
 11 somebody to do what, I don't know what you  
 12 are talking about. I hired people to work in  
 13 the homes.  
 14 Q. What was Nadia Marcinkova doing?  
 15 MR. PAGLIUCA: Object to the form  
 16 and foundation.  
 17 A. I have no idea what Nadia  
 18 Marcinkova was doing. I didn't hire her and  
 19 I don't know what you are referring to.  
 20 Q. You met Nadia Marcinkova?  
 21 A. I testified I did.  
 22 Q. Did she work for Jeffrey Epstein?  
 23 A. I have no idea what she did.  
 24 Q. Have you flown on planes with Nadia  
 25 Marcinkova?

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1 G Maxwell - Confidential  
 2 A. I don't recollect. I don't know if  
 3 I did.  
 4 Q. How many times have you flown on  
 5 Jeffrey Epstein's planes?  
 6 A. Too many times.  
 7 Q. More than 300?  
 8 A. I really couldn't tell you how  
 9 many.  
 10 Q. More than 400?  
 11 A. Again, I said I cannot tell you how  
 12 many, a lot.  
 13 Q. How many times with Nadia  
 14 Marcinkova?  
 15 A. I already testified, I have no  
 16 idea.  
 17 Q. How old was Nadia Marcinkova when  
 18 she first became involved with Jeffrey?  
 19 A. I have no idea.  
 20 Q. Was she 14?  
 21 MR. PAGLIUCA: Object to the form  
 22 and foundation.  
 23 A. I have no idea.  
 24 Q. Did she look like a child the first  
 25 time you met her?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation. Asked and answered.  
 4 Q. Did she look like a child the first  
 5 time you met Nadia Marcinkova?  
 6 A. I don't know what you mean if she  
 7 looked like a child.  
 8 Q. Did she look like she was under the  
 9 age of 18?  
 10 A. No.  
 11 Q. Did she look like she was under the  
 12 age of 16?  
 13 A. I just testified -- first of all, I  
 14 couldn't tell you how old she was, she didn't  
 15 like like a child, leave it at that.  
 16 Q. Did you know that she was a child?  
 17 MR. PAGLIUCA: Object to the form  
 18 and foundation.  
 19 A. I just answered I did not know how  
 20 old she was and she looked like an adult.  
 21 Q. In the times that you traveled with  
 22 her on Jeffrey Epstein's planes, did you ever  
 23 ask her how old she was?  
 24 MR. PAGLIUCA: Object to the form  
 25 and foundation. Assumes facts not in

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1 G Maxwell - Confidential  
 2 evidence. The witness already testified  
 3 she doesn't remember.  
 4 Q. You can answer that question.  
 5 Did you ever ask her on the many  
 6 flights you were with her or the many times  
 7 you were with her at the house?  
 8 A. First of all, I don't know I was on  
 9 many flights with her, you are making stories  
 10 up again as usual. And secondly, if I was on  
 11 a flight with her, there would not be any  
 12 reason why I would ask her how old she was.  
 13 Q. You don't recollect having any  
 14 conversation with her about her age?  
 15 A. I already testified to that.  
 16 Q. Do you know what Nadia Marcinkova  
 17 was hired to do for Jeffrey?  
 18 A. I already testified I didn't know  
 19 she was hired and I don't know that she did  
 20 anything. I don't know how to answer that  
 21 question.  
 22 Q. Was Nadia Marcinkova at the house,  
 23 the Palm Beach house, when you were present  
 24 at that house?  
 25 MR. PAGLIUCA: Object to the

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1 G Maxwell - Confidential  
 2 foundation.  
 3 A. I have no recollection of her being  
 4 at the house at the same time as me.  
 5 Q. When did you first meet Nadia  
 6 Marcinkova?  
 7 A. I already told you I don't recall.  
 8 Q. Do you recall anything about Nadia  
 9 Marcinkova?  
 10 A. That she was tall and blond.  
 11 Q. Do you recall Nadia Marcinkova  
 12 interacting with other females at the house?  
 13 A. No, I do not.  
 14 Q. Did you arrange to get a visa for  
 15 Nadia Marcinkova to come into this country?  
 16 MR. PAGLIUCA: Object to the form  
 17 and foundation.  
 18 A. Absolutely not.  
 19 Q. Did Jeffrey arrange for a visa for  
 20 Nadia Marcinkova?  
 21 MR. PAGLIUCA: You need to give me  
 22 a break so I can interpose an objection.  
 23 Object to the form and foundation.  
 24 Q. You can answer.  
 25 A. What was the question?

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1 G Maxwell - Confidential  
 2 Q. Did Jeffrey arrange for a visa for  
 3 Nadia Marcinkova?  
 4 A. I don't know what Jeffrey did. I  
 5 cannot testify what Jeffrey did.  
 6 Q. Was Nadia involved in sex with  
 7 Jeffrey and other girls?  
 8 MR. PAGLIUCA: Object to the form  
 9 and foundation.  
 10 Q. Girls under the age of 18?  
 11 MR. PAGLIUCA: Same objection.  
 12 A. I have no idea.  
 13 Q. Was Nadia involved with sex with  
 14 Jeffrey and girls over the age of 18?  
 15 MR. PAGLIUCA: Same objection.  
 16 A. I have no idea.  
 17 Q. Did Nadia recruit other girls for  
 18 sex with Jeffrey?  
 19 MR. PAGLIUCA: Object to the form  
 20 and foundation.  
 21 A. I have no idea.  
 22 Q. Do you still talk to Nadia?  
 23 A. No.  
 24 Q. Is she a pilot?  
 25 A. I have no idea.

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1 G Maxwell - Confidential  
 2 Q. Does she fly with Larry Veseski  
 3 (phonetic), one of Jeffrey's pilots?  
 4 A. I have no idea.  
 5 Q. Are you a pilot?  
 6 A. I am.  
 7 Q. Have you flown with Jeffrey Veseki?  
 8 A. I have.  
 9 Q. Have you flown with Nadia  
 10 Marcinkova?  
 11 A. What do you mean by flown?  
 12 Q. Have you been on planes with her?  
 13 A. I already testified I don't recall  
 14 having her on a plane with me.  
 15 Q. Do you know Sarah Kellen?  
 16 A. I do.  
 17 Q. When did you first meet her?  
 18 A. I don't recall exact dates.  
 19 Q. Did you meet her with the purpose  
 20 of hiring her to work for Jeffrey or having  
 21 Jeffrey hire her?  
 22 MR. PAGLIUCA: Object to the form  
 23 and foundation.  
 24 A. No.  
 25 Q. What was her relationship with

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1 G Maxwell - Confidential  
 2 Jeffrey?  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 A. I don't know exactly the nature of  
 6 her relationship but she worked for him.  
 7 Q. What did she do?  
 8 MR. PAGLIUCA: Object to the form  
 9 and foundation.  
 10 A. At the time she when was with him I  
 11 believe she traveled with him and helped with  
 12 his travel arrangements.  
 13 Q. Did she bring girls to the house to  
 14 give massages to Jeffrey?  
 15 MR. PAGLIUCA: Object to the form  
 16 and foundation.  
 17 A. I don't know what Sarah did.  
 18 Q. So you never observed Sarah  
 19 bringing girls to the home to give massages  
 20 to Jeffrey?  
 21 MR. PAGLIUCA: Object to the form  
 22 and foundation.  
 23 A. I don't understand the question,  
 24 what did you mean bring?  
 25 Q. Did you ever observe Sarah

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1 G Maxwell - Confidential  
 2 inviting, bringing, walking anyone into the  
 3 home to give a massage for Jeffrey?  
 4 MR. PAGLIUCA: Object to the form  
 5 and foundation.  
 6 A. I don't recollect anything like  
 7 that.  
 8 Q. Are you aware that Sarah Kellen was  
 9 a co-conspirator, named as a co-conspirator  
 10 in the case involving Jeffrey Epstein?  
 11 MR. PAGLIUCA: Object to the form  
 12 and foundation and also calls for a  
 13 legal conclusion.  
 14 MS. McCAWLEY I'm just asking if she  
 15 is aware of that.  
 16 A. I am aware.  
 17 Q. Who paid Sarah Kellen?  
 18 A. I have no idea.  
 19 Q. Did you ever arrange payment for  
 20 any of the employees at the home?  
 21 MR. PAGLIUCA: Object to the form.  
 22 A. What do you mean by arrange?  
 23 Q. Were you ever in charge or  
 24 responsible for paying individuals at the  
 25 home, that worked there?



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1 G Maxwell - Confidential  
 2 A. People had salaries and they were  
 3 paid by the office.  
 4 Q. Did you ever pay any individual,  
 5 did you ever hand an individual cash for work  
 6 they performed?  
 7 MR. PAGLIUCA: Object to the form.  
 8 A. Can you be more specific about what  
 9 you are asking me.  
 10 Q. Did you ever hand any individual  
 11 who was working at the home cash as payment  
 12 for something that they performed at the  
 13 home?  
 14 MR. PAGLIUCA: Object to the form.  
 15 A. To the best of my recollection  
 16 there were very few times where I would leave  
 17 some cash for people for work performed.  
 18 Q. And what type of work was being  
 19 performed where you would be doing that?  
 20 A. If I left cash for the pool guy, I  
 21 would have left potentially some cash for the  
 22 gardener, potentially for exercise  
 23 instructors and sometimes for massage  
 24 therapy.  
 25 Q. How much were the massage

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1 G Maxwell - Confidential  
 2 therapists paid?  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 A. They get paid between 100 and \$200.  
 6 Q. Did it vary based on what sexual  
 7 acts they performed?  
 8 MR. PAGLIUCA: Object to the form  
 9 and foundation.  
 10 A. No. It varied depending how much  
 11 time, some massage therapists charge more and  
 12 some charge less.  
 13 Q. Did the massage therapists that  
 14 were hired to come to the home perform sexual  
 15 acts for Jeffrey Epstein?  
 16 MR. PAGLIUCA: Object to the form  
 17 and foundation.  
 18 A. What are you asking me?  
 19 Q. I'm asking if the massage  
 20 therapists --  
 21 A. Are you asking me about underage  
 22 girls?  
 23 Q. I'm asking in general, did any of  
 24 the massage therapists in the home --  
 25 A. Are you asking if they were paid

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1 G Maxwell - Confidential  
 2 for sexual acts.  
 3 Q. I'm asking if they performed sexual  
 4 acts?  
 5 MR. PAGLIUCA: Object to the form  
 6 and foundation.  
 7 Q. Did any of the massage therapists  
 8 who were at the home perform sexual acts for  
 9 Jeffrey Epstein?  
 10 A. I don't know what you mean by  
 11 sexual acts.  
 12 Q. Did any of the massage therapists  
 13 who were working at the home perform sexual  
 14 acts, including touching the breasts,  
 15 touching the vaginal area, being touched  
 16 while Jeffrey is masturbating, having  
 17 intercourse, any of those things?  
 18 MR. PAGLIUCA: Objection. Form and  
 19 foundation.  
 20 To the extent any of this is asking  
 21 for to your knowledge any consensual sex  
 22 act that may or may not have involved  
 23 you, I'm instructing you not to answer  
 24 the question.  
 25 Q. I'm not asking about consensual sex

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1 G Maxwell - Confidential  
 2 acts. I'm asking whether any of the massage  
 3 therapists performed sexual acts for Mr.  
 4 Epstein, as I have just described?  
 5 A. I have never seen anybody have  
 6 sexual intercourse with with Jeffrey, ever.  
 7 Q. I'm not asking about sexual  
 8 intercourse. I'm asking about any sexual  
 9 act, touching of the breast -- did you ever  
 10 see -- can you read back the question?  
 11 (Record read.)  
 12 A. I'm not addressing any questions  
 13 about consensual adult sex. If you want to  
 14 talk about what the subject matter, which is  
 15 defamation and lying, Virginia Roberts, that  
 16 you and Virginia Roberts are participating in  
 17 perpetrating her lies, I'm happy to address  
 18 those. I never saw any inappropriate  
 19 underage activities with Jeffrey ever.  
 20 Q. I'm not asking about underage. I'm  
 21 asking about whether any of the masseuses  
 22 that were at the home perform sexual acts for  
 23 Jeffrey Epstein?  
 24 A. I have just answered the question.  
 25 Q. No, you haven't.

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1 G Maxwell - Confidential  
 2 A. I have.  
 3 Q. No, you haven't.  
 4 A. Yes, I have.  
 5 Q. You are refusing to answer the  
 6 question.  
 7 A. Let's move on.  
 8 Q. I'm in charge of the deposition. I  
 9 say when we move on and when we don't.  
 10 You are here to respond to my  
 11 questions. If you are refusing to answer the  
 12 court will bring you back for another  
 13 deposition to answer these questions.  
 14 Do you understand that?  
 15 MR. PAGLIUCA: You don't need to  
 16 threaten the witness.  
 17 MS. McCAWLEY: I'm not threatening  
 18 her. I'm making sure the record is  
 19 clear.  
 20 MR. PAGLIUCA: Certainly can you  
 21 apply to have someone come back and the  
 22 court may or may not have her come back  
 23 again.  
 24 Again, she is not answering  
 25 questions that relate to adult consent

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1 G Maxwell - Confidential  
 2 sex acts. Period. And that's the  
 3 instruction and we can take it up with  
 4 the court.  
 5 Q. Ms. Maxwell, are you aware of any  
 6 sexual acts with masseuses and Jeffrey  
 7 Epstein that were nonconsensual?  
 8 A. No.  
 9 Q. How do you know that?  
 10 A. All the time that I have been in  
 11 the house I have never seen, heard, nor  
 12 witnessed, nor have reported to me that any  
 13 activities took place, that people were in  
 14 distress, either reported to me by the staff  
 15 or anyone else. I base my answer based on  
 16 that.  
 17 Q. Are you familiar with a person by  
 18 the name of Annie Farmer?  
 19 A. I am.  
 20 Q. Has Annie Farmer given a statement  
 21 to police about you performing sexual acts on  
 22 her?  
 23 A. I have not heard that.  
 24 Q. Has Annie Farmer given a statement  
 25 to police about Jeffrey Epstein performing

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1 G Maxwell - Confidential  
 2 sexual acts on her?  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 A. I have not heard that.  
 6 Q. How do you know Annie Farmer?  
 7 A. Annie Farmer had a sister and her  
 8 sister introduced Annie Farmer, I believe, to  
 9 Jeffrey.  
 10 Q. Was Annie Farmer under the age of  
 11 18?  
 12 MR. PAGLIUCA: Object to the form  
 13 and foundation.  
 14 A. I don't recall how old Annie Farmer  
 15 was.  
 16 Q. Did she tell police that Jeffrey  
 17 Epstein assaulted her sexually?  
 18 MR. PAGLIUCA: Object to the form  
 19 and foundation.  
 20 A. I never heard that.  
 21 Q. Did Sarah Kellen recruit or bring  
 22 girls to the home that were under the age of  
 23 18?  
 24 MR. PAGLIUCA: Object to the form  
 25 and foundation and I think this has been

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1 G Maxwell - Confidential  
 2 asked and answered already.  
 3 Q. You can answer the question.  
 4 A. I have no idea what Sarah Kellen  
 5 did.  
 6 Q. You never observed Sarah Kellen  
 7 with girls under the age of 18 at Jeffrey's  
 8 home?  
 9 MR. PAGLIUCA: Object to the form  
 10 and foundation.  
 11 A. The answer is no, I have no idea.  
 12 Q. Do you know Glenn Dubin?  
 13 A. I do.  
 14 Q. What is your relationship with  
 15 Glenn Dubin?  
 16 MR. PAGLIUCA: Object to the form.  
 17 A. What do you mean what is my  
 18 relationship.  
 19 Q. Are you friendly with him, how do  
 20 you know him?  
 21 A. He is the husband of Eva Dubin.  
 22 Q. Is Eva Dubin one of your friends?  
 23 A. Yes.  
 24 Q. Did you ever send Virginia to  
 25 Glenn's condo at the Breakers to give him a

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1 G Maxwell - Confidential  
 2 massage?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. No.  
 6 Q. Did you ever instruct Virginia  
 7 Roberts to have sex with Glenn?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I have never instructed Virginia to  
 11 have sex with anybody ever.  
 12 Q. How old was Eva Anderson when she  
 13 met Jeffrey?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 A. I have no idea.  
 17 Q. What's she under the age of 18?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I just testified I have idea how  
 21 old she was.  
 22 Q. You testified she was your friend.  
 23 You don't know how old she was when she met  
 24 Jeffrey?  
 25 A. That happened sometime in the '70s,

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1 G Maxwell - Confidential  
 2 how would I know, or '80s. I have no idea.  
 3 Can you testify to what your friends did 30  
 4 years ago?  
 5 Q. You don't ask the questions here,  
 6 Ms. Maxwell.  
 7 What about Johanna Sjoberg, when  
 8 did you first meet Johanna?  
 9 A. I don't recall the exact date.  
 10 Q. Did you hire Johanna?  
 11 A. I don't hire people, she came to  
 12 work at the house to answer phones.  
 13 Q. Where did you meet her?  
 14 A. I just testified, I don't recall  
 15 exactly when I met her.  
 16 Q. Was one of your job  
 17 responsibilities to interview people that  
 18 would be then hired by Jeffrey?  
 19 A. That was one of my  
 20 responsibilities.  
 21 Q. Do you recall interviewing Johanna?  
 22 A. I don't recall the exact interview,  
 23 no.  
 24 Q. Do you know what tasks Johanna was  
 25 hired to performance?

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1 G Maxwell - Confidential  
 2 A. She was tasked to answer  
 3 telephones.  
 4 Q. Did you ever ask her to rub  
 5 Jeffrey's feet?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I believe that I have read that,  
 9 but I don't have any memory of it.  
 10 Q. Did you ever tell Johanna that she  
 11 would get extra money if she provided Jeffrey  
 12 massages?  
 13 A. I was always happy to give career  
 14 advice to people and I think that becoming  
 15 somebody in the healthcare profession, either  
 16 exercise instructor or nutritionist or  
 17 professional massage therapist is an  
 18 excellent job opportunity. Hourly wages are  
 19 around 7, 8, \$9 and as a professional  
 20 healthcare provider you can earn somewhere  
 21 between as we have established 100 to \$200  
 22 and to be able to travel and have a job that  
 23 pays that is a wonderful job opportunity. So  
 24 in the context of advising people for  
 25 opportunities for work, it is possible that I

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1 G Maxwell - Confidential  
 2 would have said that she should explore that  
 3 as an option.  
 4 Q. Did you tell her she would get  
 5 extra money if she massaged Jeffrey?  
 6 A. I'm just saying, I cannot recall  
 7 the exact conversation. I give career advice  
 8 and I have done that.  
 9 Q. Did you ever have Johanna massage  
 10 you?  
 11 A. I did.  
 12 Q. How many times?  
 13 A. I don't recall how many times.  
 14 Q. Was there sex involved?  
 15 A. No.  
 16 Q. Did you ever instruct Johanna to  
 17 massage Glenn Dubin?  
 18 A. I don't believe -- I have no  
 19 recollection of it.  
 20 Q. Did you ever have sexual contact  
 21 with Johanna?  
 22 MR. PAGLIUCA: Object to the form  
 23 and foundation. You need to give me an  
 24 opportunity to get in between the  
 25 questions.

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1 G Maxwell - Confidential  
 2 Anything that involves consensual  
 3 sex on your part, I'm instructing you  
 4 not to answer.  
 5 Q. Did you ever have sexual contact  
 6 with Johanna?  
 7 A. Again, she is an adult --  
 8 Q. I'm asking you, did you ever have  
 9 sexual contact with Johanna?  
 10 A. I've just been instructed not to  
 11 answer.  
 12 Q. On what basis?  
 13 A. You have to ask my lawyer.  
 14 Q. Did you ever have sexual contact  
 15 with Johanna that was not consensual on  
 16 Johanna's part?  
 17 MR. PAGLIUCA: You can answer  
 18 nonconsensual.  
 19 A. I've never had nonconsensual sex  
 20 with anybody.  
 21 Q. Not Annie Farmer?  
 22 MR. PAGLIUCA: Objection.  
 23 A. I just testified I never had  
 24 nonconsensual sex with anybody ever, at any  
 25 time, at anyplace, at any time, with anybody.

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1 G Maxwell - Confidential  
 2 Q. So if Johanna were to testify that  
 3 she did not consent to a sexual act that you  
 4 participated in --  
 5 A. I just told you I have never ever  
 6 under any circumstances with anybody, at any  
 7 time, in anyplace, in any form had  
 8 nonconsensual relations with anybody.  
 9 Q. Did you introduce Johanna to Prince  
 10 Andrew?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I've, again, read that Johanna  
 14 claimed that she met or that she said she met  
 15 Prince Andrew. I don't know if I was the one  
 16 who made the introduction or not.  
 17 Q. Do you know a female by the name of  
 18 Emmy Taylor?  
 19 A. I do.  
 20 Q. How do you know her?  
 21 A. Emmy was my assistant.  
 22 Q. So she worked for you?  
 23 A. Yes.  
 24 Q. Did you hire her?  
 25 A. Again, Jeffrey hired people.

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1 G Maxwell - Confidential  
 2 Q. Did you have sex with her?  
 3 MR. PAGLIUCA: This is the same  
 4 instruction about consensual or  
 5 nonconsensual.  
 6 Q. Was Emmy under the age of 18 when  
 7 you hired her?  
 8 A. No. I didn't hire her, as I said,  
 9 Jeffrey did.  
 10 Q. Did Emmy ever have sex with  
 11 Jeffrey?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. How would I know what somebody else  
 15 did.  
 16 Q. You weren't involved in the sex  
 17 between Jeffrey, Emmy and yourself?  
 18 A. We already --  
 19 Q. Were you involved with sex between  
 20 Jeffrey, Emmy and yourself?  
 21 MR. PAGLIUCA: Everyone is talking  
 22 over each other. You heard the  
 23 question.  
 24 Again, you you know what the  
 25 instruction is. If there is any

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1 G Maxwell - Confidential  
 2 consensual issue involved, I instruct  
 3 you not to answer.  
 4 A. Moving on.  
 5 Q. So you are refusing to answer that  
 6 question?  
 7 A. I've been instructed by my lawyer.  
 8 Q. Did you ever have sex with Jeffrey,  
 9 Emmy, Virginia and yourself when Virginia was  
 10 underage?  
 11 A. Absolutely not.  
 12 MR. PAGLIUCA: We've been going for  
 13 about an hour. I would like to take a  
 14 five-minute break, please.  
 15 MS. McCAWLEY: I'm almost done.  
 16 MR. PAGLIUCA: You are not going to  
 17 allow a break.  
 18 MS. McCAWLEY: As soon as I get  
 19 through my line of questioning, which is  
 20 perfectly appropriate.  
 21 Q. Did Emmy Taylor travel with you and  
 22 Jeffrey to Europe?  
 23 A. I'm sure she did.  
 24 Q. What is she doing today?  
 25 A. I have no idea.

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1 G Maxwell - Confidential  
 2 Q. Do you speak to her regularly now,  
 3 do you speak to her?  
 4 A. No.  
 5 Q. Do you know where she lives?  
 6 A. No.  
 7 Q. Do you know what country she lives  
 8 in?  
 9 A. No.  
 10 Q. Where is the last place you knew  
 11 that she lived?  
 12 A. Last place I knew for sure was in  
 13 Los Angeles.  
 14 Q. When did she stop working for you?  
 15 A. 2001, 2002.  
 16 Q. What tasks did she performance for  
 17 you?  
 18 A. She helped me with moving in and  
 19 out of houses, construction, she was a  
 20 general help, she helped with buying things  
 21 that needed to be purchased, if I needed her  
 22 to stand in for me during meetings, it was a  
 23 very wide ranging job.  
 24 Q. Did she ever bring females to  
 25 perform massages for Jeffrey?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. What are you asking me?  
 5 Q. Did Emmy, was it ever Emmy's  
 6 responsibility to bring females to the house  
 7 for the purposes of massaging Jeffrey?  
 8 A. Emmy's job was to help me with the  
 9 houses and work in homes. It was not her job  
 10 to whatever you just said, bring masseuses.  
 11 Q. Did she do that?  
 12 A. I have no recollection. I have no  
 13 idea.  
 14 Q. Did you pay Emmy or did Jeffrey pay  
 15 her?  
 16 A. Jeffrey.  
 17 Q. Do you recall how much she was  
 18 paid?  
 19 A. I do not.  
 20 MS. McCAWLEY: I think we can take  
 21 a break now.  
 22 THE VIDEOGRAPHER: It's 10:02 and  
 23 we are off the record.  
 24 (Recess.)  
 25 THE VIDEOGRAPHER: It's now 10:18.

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1 G Maxwell - Confidential  
 2 We are back on the record and starting  
 3 disk No. 2.  
 4 Q. Ms. Maxwell, I asked you about  
 5 Virginia Roberts earlier.  
 6 Can you describe what Virginia  
 7 Roberts' duties were when she was with Mr.  
 8 Epstein?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I believe that Virginia was a  
 12 masseuse.  
 13 Q. Was Virginia required to dress up  
 14 in any way for massages?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I have no idea.  
 18 Q. Did you provide Virginia with  
 19 outfits to wear for certain massages?  
 20 A. I have no idea what you are talking  
 21 about.  
 22 Q. For example, did you ever provide  
 23 Virginia with a school girl outfit to wear  
 24 for a massage?  
 25 A. I have no idea what you are talking

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1 G Maxwell - Confidential  
 2 about.  
 3 Q. So you didn't provide her with  
 4 that?  
 5 A. As I just testified, I have no idea  
 6 what you are talking about.  
 7 Q. I was trying to interpret whether  
 8 you didn't understand what a school girl  
 9 outfit was or you are saying that didn't  
 10 happen?  
 11 A. I clearly know what a school girl  
 12 outfit is. I have no recollection of  
 13 providing anybody with a school girl outfit.  
 14 Q. Did you have a set of outfits used  
 15 by the massage therapists that would include  
 16 things like a school girl outfit or a black  
 17 patent leather outfit or anything of that  
 18 nature?  
 19 MR. PAGLIUCA: Object to the form  
 20 and foundation.  
 21 A. That would be just another one of  
 22 Virginia's lies.  
 23 Q. You didn't have anything like that?  
 24 A. I did not.  
 25 Q. Did you have a basket of sex toys

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1 G Maxwell - Confidential  
 2 that you kept in the Palm Beach house?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. First of all what do you mean.  
 6 Q. A laundry basket that contained sex  
 7 toys in it?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. Can you ask the question again?  
 11 Q. Did you have a laundry basket that  
 12 contained sex toys in it, in the Palm Beach  
 13 House?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 Q. Did you have a laundry basket of  
 17 sex toys in the Palm Beach house?  
 18 MR. PAGLIUCA: Same objection.  
 19 Q. You can answer.  
 20 A. I don't recollect anything about a  
 21 laundry basket of sex toys.  
 22 Q. Do you recollect having sex toys at  
 23 the Palm Beach house?  
 24 A. You have to define what are you  
 25 talking about.

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1 G Maxwell - Confidential  
 2 Q. A sex toy meaning a vibrator of  
 3 some kind, sometimes they are called dildos,  
 4 of that nature, anything like that?  
 5 A. I don't recollect anything that  
 6 would formally be a dildo, anything like  
 7 that.  
 8 Q. How would you describe sex toys?  
 9 A. I wouldn't describe sex toys.  
 10 Q. Did you have anything that was of  
 11 an electronic nature that would be used  
 12 during sex?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I have no idea what you are  
 16 referring to.  
 17 (Maxwell Exhibit 3, transcript,  
 18 marked for identification.)  
 19 Q. Ms. Maxwell, I will show you what  
 20 we are marking as Maxwell Exhibit 3.  
 21 If you look at the cover you will  
 22 see it's a deposition transcript of Juan  
 23 Alessi, do you know who Juan Alessi is?  
 24 A. I do.  
 25 Q. Who is he?

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1 G Maxwell - Confidential  
 2 A. He was somebody who Jeffrey hired  
 3 who worked at the house in Palm Beach.  
 4 Q. I would like to have you turn to  
 5 page, it should be page 76 of the actual  
 6 transcript?  
 7 MR. PAGLIUCA: We have two  
 8 transcripts.  
 9 Q. The mini version I think it is  
 10 there.  
 11 A. I don't have page 76.  
 12 Q. So in the miniscript portion here,  
 13 the beginning, there should be a page that  
 14 looks like this, it's got a 76 at the top in  
 15 the small square. Are you finding that, it's  
 16 not too far back, I don't believe, it says  
 17 page 19 the the bottom.  
 18 A. Okay.  
 19 Q. It's a miniscript like this. It  
 20 has four squares?  
 21 MS. MENNINGER: 109 or 19.  
 22 MS. McCAWLEY: 19.  
 23 MR. PAGLIUCA: The Bates label is  
 24 000109.  
 25 MS. McCAWLEY: Exactly.

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1 G Maxwell - Confidential  
 2 Q. I will direct your attention to  
 3 page 76 in the deposition of Juan Alessi and  
 4 it says, Would you describe for me what kinds  
 5 of vibrators you found, question mark. The  
 6 answer is, I'm not familiar, not too familiar  
 7 with the names. They were big dildos, what  
 8 they call big rubber things like that,  
 9 indicating.  
 10 A. I can't find where you are looking.  
 11 Q. Page 76, right here.  
 12 A. I need to be able to read this. I  
 13 will not be answering anything I have not  
 14 read. You can read it out and then I will  
 15 read it.  
 16 Q. Where was I. And I used to go and  
 17 put on my gloves and pick them up and put  
 18 them in the sink, rinse it off and put it in  
 19 Ms. Maxwell's -- Ms. Maxwell had in her  
 20 closet -- she had like a laundry basket, one  
 21 of those laundry baskets that you put laundry  
 22 in, she had full of these toys and that was  
 23 -- that was me professionally leaving the  
 24 room ready for the bed when they come back to  
 25 the room again.

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1 G Maxwell - Confidential  
 2 Does that refresh your recollection  
 3 that you had a laundry basket full of sex  
 4 toys?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. First I have to read this.  
 8 Q. Sure.  
 9 MS. McCAWLEY: I will stop the  
 10 clock while the witness is reading.  
 11 MR. PAGLIUCA: No.  
 12 MS. McCAWLEY: Yes, if she is going  
 13 to read the whole document, I will stop  
 14 the clock.  
 15 MR. PAGLIUCA: If you give her  
 16 documents to refresh her recollection,  
 17 we are on the clock here.  
 18 MS. McCAWLEY: Then we will take it  
 19 up with the judge.  
 20 MR. PAGLIUCA: Read whatever you  
 21 need to answer the question.  
 22 MS. McCAWLEY: I'm going to set the  
 23 document aside and I'm just go to ask  
 24 you a question, independent of the  
 25 document.

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1 G Maxwell - Confidential  
 2 Q. Do you recall having a basket full  
 3 of sex toys?  
 4 A. I already told you I did not.  
 5 Q. We were talking a moment ago about  
 6 Ms. Roberts and her position as a masseuse,  
 7 do you know what she was paid for working as  
 8 a masseuse for Jeffrey Epstein?  
 9 A. I do not.  
 10 Q. Did you ever pay her?  
 11 A. I don't ever recall paying her.  
 12 Q. Do you know what happened during  
 13 the massage appointments with Jeffrey Epstein  
 14 and Virginia Roberts?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. No.  
 18 Q. Were you ever present to view a  
 19 massage between Jeffrey Epstein and Virginia  
 20 Roberts?  
 21 A. I don't recollect ever seeing  
 22 Virginia and Jeffrey in a massage situation.  
 23 Q. Do you ever recollect seeing them  
 24 in a sexual situation?  
 25 A. I never saw them in a sexual

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1 G Maxwell - Confidential  
 2 situation.  
 3 Q. Did you ever participate in sex  
 4 with Virginia Roberts and Jeffrey Epstein?  
 5 A. I never ever at any single time at  
 6 any point ever at all participated in  
 7 anything with Virginia and Jeffrey. And for  
 8 the record, she is an absolute total liar and  
 9 you all know she lied on multiple things and  
 10 that is just one other disgusting thing she  
 11 added.  
 12 Q. Did you help her obtain an  
 13 apartment in Palm Beach to live in?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 Q. Was that part of your  
 17 responsibilities for Jeffrey?  
 18 A. First of all, I didn't know she had  
 19 an apartment in Palm Beach. I only learned  
 20 that from the many times you guys have gone  
 21 to the press to sell stories, so no.  
 22 Q. Did you help her get a cell phone,  
 23 was that one of your responsibilities for  
 24 Jeffrey, to get her is a cell phone as part  
 25 of her masseuse obligations?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I don't know what that means,  
 5 masseuse obligation, I don't know what you  
 6 are referring to. Would you like to ask the  
 7 question properly?  
 8 Q. I think it was proper. I will ask  
 9 it again.  
 10 Did you ever assist in getting  
 11 Virginia Roberts a cell phone to use during  
 12 the time that she worked for Jeffrey Epstein?  
 13 A. I have no recollection of doing  
 14 anything of that nature.  
 15 Q. Did you ever tell Virginia that you  
 16 wanted her to have a cell phone so that she  
 17 could be on call regularly?  
 18 A. I have no recollection of that  
 19 conversation.  
 20 Q. How often would Virginia come over  
 21 to the house in Palm Beach to give massages?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Ask the question again, please.  
 25 Q. How often did Virginia Roberts come

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1 G Maxwell - Confidential  
 2 over to the house in Palm Beach to give  
 3 massages?  
 4 A. It's important to understand that I  
 5 wasn't with Jeffrey all the time. In fact, I  
 6 was only in the house less than half the  
 7 time, so I cannot testify to when I wasn't in  
 8 the house how often she came when I wasn't  
 9 there.  
 10 What I can say is that I barely  
 11 would remember her, if not for all of this  
 12 rubbish, I probably wouldn't remember her at  
 13 all, except she did come from time to time  
 14 but I don't recollect her coming as often as  
 15 she portrayed herself.  
 16 Q. How many times a day on an average  
 17 day would Jeffrey Epstein get a massage?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. When I was at the house and when I  
 21 was there with him, he received a massage, on  
 22 average, about once a day.  
 23 Q. Just once?  
 24 A. Yes.  
 25 Q. Were there days when he received

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1 G Maxwell - Confidential  
 2 four or five?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. When I was present at the house, I  
 6 never saw something like that.  
 7 Q. Do you know if Virginia was  
 8 required to be on call at all times to come  
 9 to the house if Jeffrey wanted her there?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I have no idea of the arrangements  
 13 that Virginia made with Jeffrey.  
 14 Q. When Virginia was in New York,  
 15 would Virginia sleep at Jeffrey's mansion in  
 16 New York?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I don't recollect her being in New  
 20 York and I have no idea where she slept.  
 21 Q. You don't ever remember seeing  
 22 Virginia Roberts in New York?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. I would barely recollect her at

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1 G Maxwell - Confidential  
 2 all, except for this story.  
 3 Q. Do you recall Virginia Roberts  
 4 calling you because she was having a medical  
 5 crisis and you and Jeffrey taking her to the  
 6 hospital?  
 7 A. I have heard this absurd story and  
 8 if any part of it were true I would remember  
 9 that. I do not.  
 10 Q. You don't remember taking her to  
 11 the hospital?  
 12 A. It's not that I don't remember it,  
 13 it didn't happen.  
 14 Q. How do you know it didn't happen?  
 15 A. That's the sort of memory you would  
 16 recall.  
 17 Q. Do you recall, you said you don't  
 18 remember her being at the New York mansion.  
 19 When you were in New York would you stay at  
 20 the New York mansion with Jeffrey?  
 21 A. I stayed from time to time.  
 22 Q. Do you recall Virginia being at the  
 23 New York mansion when Prince Andrew came to  
 24 visit?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. Like I told you, I don't recall her  
 4 being at the house at all.  
 5 Q. How many homes does Jeffrey have?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. When I was working for him, I think  
 9 he had six maybe.  
 10 Q. Would Virginia stay with him in  
 11 those homes?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I can only testify for when I was  
 15 present with him and I cannot say what she  
 16 did when I wasn't present with him.  
 17 Q. When you were present, would  
 18 Virginia stay in the homes with him?  
 19 A. I don't recall her staying in the  
 20 houses.  
 21 Q. Did you train Virginia on how to  
 22 recruit other girls for massages?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. No.



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1 G Maxwell - Confidential  
 2 Q. Did you train Virginia on how to  
 3 recruit other girls to perform sexual  
 4 massages?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. No. And it's absurd and her entire  
 8 story is one giant tissue of lies and  
 9 furthermore, she herself has -- if she says  
 10 that, you have to ask her about what she did.  
 11 Q. Does Jeffrey like to have his  
 12 nipples pinched during sexual encounters?  
 13 MR. PAGLIUCA: Objection to form  
 14 and foundation.  
 15 A. I'm not referring to any advice on  
 16 my counsel. I'm not talking about any adult  
 17 sexual things when I was with him.  
 18 Q. When Jeffrey would have a massage,  
 19 would he request that the masseuse pinch his  
 20 nipples while he was having a massage?  
 21 A. I'm not talking about anything with  
 22 consensual adult situation.  
 23 Q. What about with underage --  
 24 A. I am not aware of anything.  
 25 Q. You are not aware of Jeffrey

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1 G Maxwell - Confidential  
 2 Epstein ever having sex with an underage  
 3 minor and asking them to pinch his nipples?  
 4 A. I am not.  
 5 Q. So I'm going to direct you to, I  
 6 believe it's Maxwell Exhibit 1, the police  
 7 report.  
 8 Are you aware that over 30 under  
 9 age minors gave testimony to police that they  
 10 were engaged in sexual acts during,  
 11 quote-unquote, massages.  
 12 MR. PAGLIUCA: The witness needs to  
 13 find Exhibit 1. Exhibit 1 -- if you can  
 14 hand me that please.  
 15 Q. So now with respect to the police  
 16 report, are you aware that over 30 underage  
 17 girls, meaning under the age of 18 gave  
 18 reports to police that they were assaulted  
 19 sexually by Jeffrey Epstein during massages?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I read the police report. That's  
 23 all I can testify to.  
 24 Q. Are you aware of what is in the  
 25 police report? Are you aware that there were

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1 G Maxwell - Confidential  
 2 30 girls --  
 3 A. I did not count the number of girls  
 4 and I did read the police report. I can only  
 5 testify to what I read.  
 6 Q. So you are aware that the police  
 7 report contains reports from 30 underage  
 8 girls?  
 9 A. I can't testify to what the girls  
 10 said. I can only testify to the fact that I  
 11 read a police report that stated that.  
 12 Q. Were you working for Jeffrey -- you  
 13 said you worked for him off an on until 2009,  
 14 is that correct?  
 15 A. I helped out from time to time.  
 16 Q. So you were working with him during  
 17 the time period when these underage girls  
 18 were visiting Jeffrey's home?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I was not -- what year, I need  
 22 years.  
 23 Q. How about let's say 2005?  
 24 A. I'm not sure I was at the house at  
 25 all in 2005, maybe one day, maybe.

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1 G Maxwell - Confidential  
 2 Q. How about 2004?  
 3 A. I was present for his mother's --  
 4 his mother died in 2004 so I was there for  
 5 his mother's death and the funeral and I was  
 6 at the house maybe a handful of days, again.  
 7 Q. I would like to direct you to, you  
 8 have it pulled together now, it's page 39,  
 9 Bates stamped Giuffre 00040?  
 10 A. Can you repeat that, please.  
 11 Q. Sure. 00040.  
 12 A. Yes.  
 13 Q. At the top of that document, about  
 14 three lines down, you see the redacted  
 15 portions where there is black so it blacks  
 16 out the name.  
 17 A. I see black redacted portions.  
 18 Q. That's a black redaction of the  
 19 name of the minor and there is -- I will  
 20 represent for the record that's what it is.  
 21 You can contest that but I'm not asking about  
 22 the name of the minor.  
 23 Five lines down, it says, She was  
 24 just 16 years of age.  
 25 Do you see that?

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1 G Maxwell - Confidential  
 2 A. I have to read that, if you want me  
 3 to testify to some things.  
 4 Q. I'm asking if you see where it  
 5 says, She was just 16 years old.  
 6 A. No, I have to read it.  
 7 Q. It's five line downs on the first  
 8 paragraph.  
 9 A. I do see that.  
 10 Q. Then the next paragraph down, it  
 11 says, this is the next full paragraph, it  
 12 says, Epstein entered the room, introduced  
 13 himself, Epstein lay on the table and told  
 14 her to get comfortable, blank could not  
 15 remember if he was naked or if he entered the  
 16 room with a towel. Blank stated she provided  
 17 the massage wearing her panties. She  
 18 continued rubbing his thighs and feet. Blank  
 19 advised he turned over on his back and  
 20 continued to rub his legs with oil. Epstein  
 21 touched her breast and began to masturbate.  
 22 I asked if she knew what circumcised and  
 23 uncircumcised meant. She stated circumcised  
 24 is when the penis had no foreskin.  
 25 Then jumping down to the next

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1 G Maxwell - Confidential  
 2 paragraph, it says, Blank became upset,  
 3 crying hysterically and stated she was paid  
 4 and also instructed to have sex with Epstein  
 5 and Nadia Marcinkova by Epstein.  
 6 Do you see that there?  
 7 A. I do.  
 8 Q. Are you aware that there were  
 9 underage minors in the Palm Beach house that  
 10 were required to give sexual massages to  
 11 Jeffrey Epstein?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation. This has been  
 14 asked and answered already. Now you are  
 15 just reading a document.  
 16 MS. McCAWLEY: I am allowed to take  
 17 this deposition.  
 18 A. I already testified --  
 19 Q. Are you aware there were underage  
 20 girls, 30 of them, in this police report that  
 21 were assaulted by Jeffrey Epstein in the Palm  
 22 Beach house during the time you are working  
 23 there?  
 24 A. I am aware that Virginia has  
 25 lied repeatedly --

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1 G Maxwell - Confidential  
 2 Q. I'm not asking about Virginia. I'm  
 3 asking if you are aware that there were over  
 4 30 underage girls who gave reports to police  
 5 officers during the time you worked for  
 6 Jeffrey Epstein. Are you aware of that?  
 7 MR. PAGLIUCA: Counsel, what is  
 8 your factual basis for asserting there  
 9 are 30 underaged people who gave  
 10 reports?  
 11 MS. McCAWLEY: I don't have to  
 12 answer that.  
 13 MR. PAGLIUCA: Are you representing  
 14 as an officer of the court that you have  
 15 personal knowledge that there are 30  
 16 people referenced in these police  
 17 reports?  
 18 MS. McCAWLEY: That's my  
 19 understanding, that there are 30 girls.  
 20 MR. PAGLIUCA: How is that your  
 21 understanding if these are redacted  
 22 reports?  
 23 MS. McCAWLEY: By reading through  
 24 the reports.  
 25 MR. PAGLIUCA: So you have personal

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1 G Maxwell - Confidential  
 2 knowledge there are 30 people --  
 3 MS. McCAWLEY: Just like can you if  
 4 you read through -- I will not argue  
 5 with you counsel.. she can answer yes or  
 6 no.  
 7 Q. Are you aware there were over 30  
 8 individuals who were minors who gave reports  
 9 to police just like the one we just read that  
 10 they were sexually assaulted by Jeffrey  
 11 Epstein in the Palm Beach home during the  
 12 years that you were working with him?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation. You can answer if  
 15 you have knowledge.  
 16 A. I already testified I was limited  
 17 in the house, a couple of days, there is no  
 18 way I knew. I have read these reports. I  
 19 cannot testify to 30. Given the experience  
 20 I've had with Virginia's lies, it's very hard  
 21 for me to testify about what I see. I can  
 22 tell from you my personal knowledge I did not  
 23 know what you are referring to.  
 24 Q. You did not know there were  
 25 underage girls in the home that were being

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1 G Maxwell - Confidential  
 2 assaulted by Jeffrey Epstein during the time  
 3 you were working there?  
 4 A. Based on the lies that I have  
 5 already been told, I cannot comment on any --  
 6 Q. Are you saying these 30 girls are  
 7 lying when they gave these reports to police  
 8 officers?  
 9 A. I'm not testifying to their lies.  
 10 I'm testifying to Virginia's lies.  
 11 Q. I am not asking about Virginia's  
 12 lies.  
 13 A. I can only testify to Virginia's  
 14 lies. I can testify to having read these  
 15 reports. I cannot testify to anything else  
 16 about them.  
 17 Q. So your testimony is that during  
 18 the time you were working there, you did not  
 19 know that these minor children were being  
 20 abused in the home while you were there?  
 21 A. What I have already told you and I  
 22 will repeat, I was in the house very limited  
 23 times, very few times. I do not know what  
 24 you are referring to. I've read these  
 25 reports but based on the lies that Virginia

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1 G Maxwell - Confidential  
 2 has perpetrated, cannot tell you what is true  
 3 or factual or not.  
 4 Q. You said you were in the home a  
 5 very limited time, so average in the year for  
 6 example, 2004, how many times would you have  
 7 been in his Palm Beach home?  
 8 A. Very hard for me to state but very  
 9 little.  
 10 Q. How about his New York home?  
 11 A. Same.  
 12 Q. Were you his girlfriend in that  
 13 year, in 2004?  
 14 A. Define what you mean by girlfriend.  
 15 Q. Were you in a relationship with him  
 16 where you would consider yourself his  
 17 girlfriend?  
 18 A. No.  
 19 Q. Did you ever consider yourself his  
 20 girlfriend?  
 21 A. That's a tricky question. There  
 22 were times when I would have liked to think  
 23 of myself as his girlfriend.  
 24 Q. When would that have been?  
 25 A. Probably in the early '90s.

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1 G Maxwell - Confidential  
 2 Q. In your responsibilities in working  
 3 for Jeffrey, would you book massages for him  
 4 on any given day so that he would have a  
 5 massage scheduled? Would you take a call for  
 6 example and book a massage for him?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 Q. You can answer.  
 10 A. Typically, that was not my  
 11 responsibility. He would either book the  
 12 massage himself or one of his other  
 13 assistants would do that.  
 14 Q. From time to time you had to do  
 15 that?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. Like I said, typically it was  
 19 somebody else's responsibility.  
 20 Q. If you were unable to book a girl  
 21 for a massage on a given day, would that mean  
 22 that you were responsible for giving him a  
 23 sexual massage?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation and I instruct you

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1 G Maxwell - Confidential  
 2 not to answer any questions about any of  
 3 your consensual adult sexual activity.  
 4 Q. So you are not going to answer that  
 5 question?  
 6 A. You just heard my counsel.  
 7 Q. Have you ever said to anybody that  
 8 recruiting other girls to perform sexual  
 9 massages for Jeffrey Epstein takes the  
 10 pressure off you?  
 11 MR. PAGLIUCA: Object to the form  
 12 and foundation.  
 13 A. Repeat the question and break it  
 14 out.  
 15 Q. Have you ever said to anybody that  
 16 you recruit girls --  
 17 A. Stop right there. I never  
 18 recruited girls, let's stop there. Now  
 19 breakdown the question.  
 20 Q. Have you ever said to anybody --  
 21 A. By girls, we are talking about  
 22 underage people -- you said girls, are you  
 23 talking about underage -- we are not talking  
 24 about consensual acts -- this is a defamation  
 25 suit.

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1 G Maxwell - Confidential  
 2 Q. I'm asking the questions. I know  
 3 what this case is about. I'm trying to -- I  
 4 will ask you questions if you don't  
 5 understand the question I can break it down  
 6 for you. I'm happy to do that.  
 7 A. Break it down a lot please.  
 8 Q. I will do that.  
 9 The question is, have you ever said  
 10 to anybody that you recruit other girls --  
 11 A. Why don't you stop there.  
 12 Q. Let me finish my question.  
 13 Have you ever said to anybody that  
 14 you recruit girls to take the pressure off  
 15 you, so you won't have to have sex with  
 16 Jeffrey, have you said that?  
 17 That's the question?  
 18 A. You don't ask me questions like  
 19 that. First of all, you are trying to trap  
 20 me, I will not be trapped. You are asking me  
 21 if I recruit, I told you no. Girls meaning  
 22 underage, I already said I don't do that with  
 23 underage people and as to ask me about a  
 24 specific conversation I had with language, we  
 25 talking about almost 17 years ago when this

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1 G Maxwell - Confidential  
 2 took place. I cannot testify to an actual  
 3 conversation or language that I used with  
 4 anybody at any time.  
 5 Q. Have you ever said to anybody that  
 6 you recruit other females over the age of 18  
 7 to take the pressure off you to having to  
 8 have sex with Jeffrey?  
 9 A. I totally resent and find it  
 10 disgusting that you use the word recruit. I  
 11 already told you I don't know what you are  
 12 saying about that and your implication is  
 13 repulsive.  
 14 Q. Answer my question.  
 15 A. I just did.  
 16 Q. Have you ever said to anybody that  
 17 you recruit females --  
 18 A. I don't recruit anybody.  
 19 Q. That's an answer. So you never  
 20 said that?  
 21 A. I'm testifying that I cannot  
 22 testify to an actual language --  
 23 Q. It's a yes or no.  
 24 A. I will not testify to an actual  
 25 statement made 17 years ago, so I cannot

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1 G Maxwell - Confidential  
 2 testify to actual language.  
 3 Q. So you won't testify to anything  
 4 I'm asking you 17 years ago about a statement  
 5 you made. How do you know it's 17 years ago?  
 6 A. We are talking about a time in  
 7 2000, right?  
 8 Q. Have you ever said that to anybody?  
 9 A. I'm 54 years old so you are asking  
 10 me in my entire life, what words are you  
 11 asking me in my entire life?  
 12 Q. Your entire life is limited by the  
 13 time you were with Jeffrey, this is the  
 14 question.  
 15 A. Let's time limit the question you  
 16 are asking me.  
 17 Q. So from, let's say, I think you  
 18 said you started with him in 1992, is that  
 19 correct, and finished with him in 2009.  
 20 So from 1992 to 2009 have you ever  
 21 said to anybody that you recruit other and we  
 22 will start with girls to take the pressure  
 23 off you to have sex with Jeffrey?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. First of all I resent and despise  
 3 the world recruit. Would you like to define  
 4 what you mean by recruit and by girls, you  
 5 mean underage people. I never had to do  
 6 anything with underage people. So why don't  
 7 you reask the question in a way that I am  
 8 able to answer it.  
 9 Q. I'm asking if you ever said that to  
 10 anybody. So if you don't understand the word  
 11 recruit and you never used that word then the  
 12 answer to that question would be no.  
 13 A. I have no memory as I sit here  
 14 today having used that word.  
 15 Q. Did you ever meet an underage girl  
 16 in London to introduce her to Jeffrey to  
 17 provide him with a massage?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. Run that past me one more time.  
 21 Q. Did you ever meet an underage girl  
 22 in London to introduce her to Jeffrey to  
 23 perform a massage?  
 24 MR. PAGLIUCA: Same objection.  
 25 A. Are you asking me if I met anybody

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1 G Maxwell - Confidential  
 2 that was underage in London specifically to  
 3 provide a massage to Jeffrey, is that your  
 4 question?  
 5 Q. Yes.  
 6 A. No.  
 7 Q. Do you know who Alexander Dixon is?  
 8 A. I don't recall her right now.  
 9 Q. Do you know if -- strike that.  
 10 During the time that you were  
 11 working for Jeffrey, did you ever observe any  
 12 foreign females, so in other words, not from  
 13 the United States, that were brought to  
 14 Jeffrey's home to perform massages?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. Females, what age are we talking?  
 18 Q. Any age.  
 19 A. Can you repeat the question?  
 20 Q. During the time you were working  
 21 for Jeffrey, did you ever observe any foreign  
 22 females of any age that were at Jeffrey's  
 23 home to perform a massage?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. Are you asking me if any foreigner,  
 3 not an American person, gave Jeffrey a  
 4 massage?  
 5 Q. Yes.  
 6 A. Well, as I sit here today, I can't  
 7 think of anyone who is foreign. Certainly --  
 8 I just can't think of anybody right this  
 9 second.  
 10 Q. How about any foreign girls who  
 11 were under the age of 18?  
 12 A. I already testified to not knowing  
 13 anything about underage girls.  
 14 Q. Were there foreign girls who were  
 15 brought to Jeffrey's home by Jean Luc Brunel  
 16 for the purposes of providing massages?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I am not aware of Jean Luc bringing  
 20 girls. I have not no idea what you are  
 21 talking about.  
 22 Q. You have never been around foreign  
 23 girls who are under the age of 18 at  
 24 Jeffrey's homes?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I already testified about not  
 4 knowing about underage girls.  
 5 Q. Did you provide any assistance with  
 6 obtaining visas for foreign girls that were  
 7 under the age of 18?  
 8 A. I've never participated in helping  
 9 people of any age to get visas.  
 10 Q. Did Jeffrey, was it Jeffrey's  
 11 preference to start a massage with sex?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I think you should ask that  
 15 question of Jeffrey.  
 16 Q. Do you know?  
 17 A. I don't believe that was his  
 18 preference. I think -- you have to  
 19 understand, a massage -- perhaps you are not  
 20 really familiar with what massage is.  
 21 Q. I am, I don't need a lecture on  
 22 massage.  
 23 A. I think you do.  
 24 MR. PAGLIUCA: No question pending.  
 25 She will ask you another question now.

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1 G Maxwell - Confidential  
 2 A. Massage is for health benefits.  
 3 Q. When did you first meet Jeffrey?  
 4 A. Some point in 1991.  
 5 Q. And did Jeffrey know your father?  
 6 A. No.  
 7 Q. How were you introduced to Jeffrey?  
 8 A. Some friend introduced us.  
 9 Q. Can you describe your relationship  
 10 back in 1991, was it friendship or was it  
 11 girlfriend relationship or was it a work  
 12 relationship, what was your relationship in  
 13 1991?  
 14 A. It was just friendly.  
 15 Q. Then I believe you testified you  
 16 began working for him in 1992, is that  
 17 correct?  
 18 A. Yes.  
 19 Q. In 1992 I know you gave me the  
 20 description of the work that you were  
 21 performing for him, how much was he paying  
 22 you, do you remember?  
 23 A. I don't recall.  
 24 Q. Do you know for example in 2001 how  
 25 much he was paying you?

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1 G Maxwell - Confidential  
 2 A. I don't recall.  
 3 Q. Did it change over the years or did  
 4 the payment remain the same?  
 5 A. I believe over the course of time  
 6 it increased a little bit.  
 7 Q. Was that the -- was that payment  
 8 the payment that -- was the payment made with  
 9 respect to the jobs, the work you were  
 10 performing for Jeffrey, was that your sole  
 11 income at that time?  
 12 MR. PAGLIUCA: I object to the  
 13 form. I'm also going to instruct you  
 14 not to answer about sources of -- your  
 15 personal sources of income outside of  
 16 Mr. Epstein at all.  
 17 MS. McCAWLEY: What's the basis for  
 18 that?  
 19 MR. PAGLIUCA: It's confidential,  
 20 it's not part of this lawsuit.  
 21 MS. McCAWLEY: We have a protective  
 22 order and it is part of this lawsuit  
 23 with respect to our damage claims.  
 24 MR. PAGLIUCA: It's not and, in  
 25 fact, you are not entitled to ask

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1 G Maxwell - Confidential  
 2 financial information of a defendant in  
 3 this kind of case, in a defamation case  
 4 unless and until there is a finding that  
 5 you are entitled to punitive damages.  
 6 That is clear in New York case law, both  
 7 state and Federal.  
 8 MS. McCAWLEY: We disagree on that  
 9 point and we will come back to that.  
 10 Q. From the source of payment from the  
 11 source of Jeffrey, from your work, can you  
 12 give me a range on that, do you know was it  
 13 over \$100,000?  
 14 A. I just testified I don't recall.  
 15 Q. You don't don't know if it was  
 16 \$500,000?  
 17 A. It was less than that.  
 18 Q. Somewhere between 100 and 500,  
 19 would that be fair to say?  
 20 A. I believe it was between 100 and  
 21 \$200,000.  
 22 Q. Did Jeffrey during the time that  
 23 you were working for him purchase a town home  
 24 for you?  
 25 A. The subject of the townhouse is, I

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1 G Maxwell - Confidential  
 2 worked for it and I had a loan, we did loans.  
 3 Q. So a loan through Jeffrey?  
 4 A. I don't recall the exact  
 5 transaction.  
 6 Q. Did he purchase for you a  
 7 helicopter during the time you were working  
 8 for him?  
 9 A. It was his helicopter.  
 10 Q. When did you obtain your pilot  
 11 license?  
 12 A. I believe it was '98 or '99.  
 13 Q. Was that for both airplanes and  
 14 helicopters or just helicopters?  
 15 A. Just helicopters.  
 16 Q. Have you ever flown President  
 17 Clinton on your helicopter?  
 18 A. That is another one of Virginia's  
 19 lies.  
 20 Q. The question is have you ever done  
 21 that?  
 22 A. I have never flown President  
 23 Clinton at any time ever, in any helicopter,  
 24 in any place, any time, in any state, in any  
 25 country, at any time anywhere.

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1 G Maxwell - Confidential  
 2 Q. Have you ever had dinner with  
 3 President Clinton at Jeffrey's home, at any  
 4 of Jeffrey's homes?  
 5 A. No, I don't believe so.  
 6 Q. Have you traveled on Jeffrey's  
 7 planes with President Clinton?  
 8 A. Yes, I have.  
 9 Q. Would that have been in 2002?  
 10 A. It's very hard for me to recollect  
 11 exact dates but that sounds about right.  
 12 Q. Was that during the time that  
 13 Virginia was working for Jeffrey?  
 14 A. I don't know that Virginia ever did  
 15 work for Jeffrey. I don't exactly know if  
 16 she testified to her so-called duties, we  
 17 know she is a serial liar so I can't testify  
 18 to what she did or didn't do. So I object to  
 19 that characterization of her. So repeat the  
 20 question, please.  
 21 Q. Can you read the question back?  
 22 (Record read.)  
 23 Q. You can answer the question.  
 24 A. What was the question again?  
 25 Q. When you were traveling on the

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1 G Maxwell - Confidential  
 2 plane with President Clinton, was that during  
 3 the time, it was 2002, that you were on a  
 4 flight with Clinton, was that during the time  
 5 Virginia was working for Jeffrey?  
 6 MR. PAGLIUCA: Object to the form.  
 7 Misstates the witness' answer and if you  
 8 can answer the question, you can answer  
 9 it.  
 10 A. Well, like I said, I don't recall  
 11 exactly when I flew with him. I don't recall  
 12 when Virginia, we know what Virginia claims  
 13 when she left, so I can't answer the  
 14 question. I have no idea.  
 15 Q. Do you know Prince Andrew?  
 16 A. I do.  
 17 Q. How long have you known him?  
 18 A. A very long time.  
 19 Q. Since you were a child?  
 20 A. I really -- it's so long, it's  
 21 really a long time ago. I just don't recall.  
 22 Q. Do you remember how you first met  
 23 him?  
 24 A. No, I do not.  
 25 Q. Did you introduce him to Jeffrey?

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1 G Maxwell - Confidential  
 2 A. That would be another of Virginia's  
 3 lies and the lies you perpetrate. I never  
 4 introduced Prince Andrew to Jeffrey Epstein  
 5 at any time ever, so just add that the to  
 6 long list of lies.  
 7 Q. Did Jeffrey know Prince Andrew?  
 8 A. Clearly he knew him. I think we  
 9 have that answer but how -- yeah.  
 10 Q. Do you know how Jeffrey met Prince  
 11 Andrew?  
 12 A. I do not know Jeffrey met Prince  
 13 Andrew. What I do know is that I did not  
 14 introduce them. That is one of the many  
 15 lies. Are we tallying all the lies?  
 16 Q. Do you know when Jeffrey met Prince  
 17 Andrew?  
 18 A. I do not know when Jeffrey met  
 19 Prince Andrew.  
 20 Q. Did you ever introduce Prince  
 21 Andrew to any girls under the age of 18 who  
 22 were not friends of yours children?  
 23 A. I have not introduced Prince Andrew  
 24 to anyone that I am aware of other than  
 25 friends of mine who have kids under that age

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1 G Maxwell - Confidential  
 2 that he may have met socially through me.  
 3 Q. Did you ever introduce Prince  
 4 Andrew to Virginia in London?  
 5 A. I understand her story about London  
 6 but again, her tissue of lies is extremely  
 7 hard to pick apart what is true and what  
 8 isn't. Actually I wouldn't recollect her at  
 9 all but for her tissue stories about this  
 10 situation.  
 11 Q. So did you ever introduce Prince  
 12 Andrew to Virginia in London?  
 13 A. I have no recollection.  
 14 Q. Did Virginia ever stay at your home  
 15 in London, your town home?  
 16 A. I know she claims she did but if  
 17 you are asking me here today to remember  
 18 specifically, I cannot.  
 19 Q. Do you remember taking a trip with  
 20 Virginia to travel over to Europe, including  
 21 London?  
 22 A. So I have seen her reports and I  
 23 have seen the plane reports. I see she says  
 24 she was on that but again, I really have no  
 25 recollection of her.

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1 G Maxwell - Confidential  
 2 Q. Did you know that she was 17 at the  
 3 time of that trip?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I have --  
 7 Q. Did you know she was 17 at the time  
 8 of that trip?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I didn't even know she was on the  
 12 trip.  
 13 Q. Did you hold her passport for her  
 14 when she was traveling?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I have no recollection whatsoever  
 18 of her even being on the trip nor holding her  
 19 passport.  
 20 (Maxwell Exhibit 4, picture, marked  
 21 for identification.)  
 22 Q. I'm showing you what we marked as  
 23 Maxwell Exhibit 4.  
 24 Can you take a look at that picture  
 25 for me?

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1 G Maxwell - Confidential  
 2 A. I've looked at it.  
 3 Q. Are you in that picture?  
 4 A. I am.  
 5 Q. Is that Prince Andrew in the  
 6 picture as well?  
 7 A. It is.  
 8 MR. PAGLIUCA: I don't believe this  
 9 has been produced to us in discovery by  
 10 you.  
 11 MS. McCAWLEY: The picture?  
 12 MR. PAGLIUCA: Yes.  
 13 MS. McCAWLEY: It has.  
 14 MS. MENNINGER: Is it the same  
 15 exact photograph.  
 16 MS. McCAWLEY: I believe so. We  
 17 will find one. The picture has been  
 18 produced a number of times.  
 19 MR. PAGLIUCA: I've seen different  
 20 iterations of this, I don't believe I  
 21 have ever seen this.  
 22 MS. McCAWLEY: We had them blow it  
 23 up on a page so she could see it. We  
 24 could use an article.  
 25 While you are looking for that, I

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1 G Maxwell - Confidential  
 2 will skip ahead. Hold that until we can  
 3 find one that has the Bates range on it.  
 4 Q. Do you recall Virginia being at  
 5 your London town home?  
 6 A. I do not.  
 7 Q. Do you recall going to dinner with  
 8 Prince Andrew, Jeffrey Epstein and Virginia  
 9 Roberts in London, at any time?  
 10 A. I do not.  
 11 Q. Do you recall going to a place  
 12 called Club Tramp with Prince Andrew, Jeffrey  
 13 Epstein and yourself and Virginia Roberts?  
 14 A. I would just like to state for the  
 15 record that Prince Andrew is a very famous  
 16 person, I know you are aware because you like  
 17 to use him so often in your press stories --  
 18 please let me finish. Were he at Tramp, at  
 19 any time, that would be reported by the  
 20 press. I do not have any recollection of it  
 21 and I doubt it actually happened.  
 22 Q. You don't recall that.  
 23 Do you recall taking Virginia  
 24 shopping when you were in London to buy an  
 25 outfit to meet Prince Andrew?

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1 G Maxwell - Confidential  
 2 A. No, I don't.  
 3 Q. Where in your town home -- we will  
 4 come back to that.  
 5 Do you have guest bedrooms in your  
 6 town home in London?  
 7 A. I do.  
 8 Q. How many?  
 9 A. Two.  
 10 Q. Did Prince Andrew ever visit  
 11 Jeffrey and you in New York?  
 12 A. Yes.  
 13 Q. Do you remember him visiting you  
 14 and Jeffrey in New York in the spring of  
 15 2001?  
 16 A. Again, I can't testify to any  
 17 specific dates.  
 18 Q. So you don't have a recollection of  
 19 that?  
 20 A. I have a recollection -- you've  
 21 asked me if I have a recollection of being in  
 22 New York but if you are asking for a date, I  
 23 cannot confirm that date.  
 24 Q. Do you remember Prince Andrew being  
 25 present in New York for a party where Johanna

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1 G Maxwell - Confidential  
 2 Sjoberg was also present?  
 3 A. I don't recollect.  
 4 Q. Do you recall ever giving Prince  
 5 Andrew a gift of a puppet that was in the  
 6 same -- that looked like him?  
 7 A. I never gave him a gift of a  
 8 puppet.  
 9 Q. Did Jeffrey ever give him a gift of  
 10 a puppet?  
 11 A. No, not that I am aware of.  
 12 Q. Have you ever given him any gifts?  
 13 MR. PAGLIUCA: Objection,  
 14 foundation.  
 15 A. I know Andrew --  
 16 Q. Have you ever given him any gifts  
 17 that you remember when he came to Jeffrey's  
 18 home in New York?  
 19 A. I don't recall giving him any gifts  
 20 in New York.  
 21 (Maxwell Exhibit 5, picture, marked  
 22 for identification.)  
 23 Q. I think I directed you to page  
 24 0034.  
 25 Is that a picture that was taken at



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1 G Maxwell - Confidential  
 2 your London town home?  
 3 A. I have no idea what this picture  
 4 was taken. I know what she purports it to be  
 5 but I'm not going to say that I do.  
 6 Q. Do the surroundings look like your  
 7 London town home?  
 8 A. They are familiar.  
 9 Q. Do you know who took this picture?  
 10 A. I do not.  
 11 Q. Did Jeffrey Epstein take the  
 12 picture?  
 13 A. I just testified I don't know who  
 14 took the picture.  
 15 Q. So you don't know if Jeffery  
 16 Epstein took the picture?  
 17 A. When I tell you I don't know who  
 18 took the picture, it doesn't mean him -- I  
 19 don't know who took the picture. You can  
 20 come up with 50 names, I still do not know  
 21 who took the picture.  
 22 Q. Did you observe Prince Andrew go  
 23 into a room with Virginia alone in your town  
 24 home?  
 25 A. I cannot recall. As I have said,

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1 G Maxwell - Confidential  
 2 no.  
 3 Q. Did Prince Andrew ever tell you  
 4 that he had sex with Virginia Roberts?  
 5 A. He did not.  
 6 Q. Did Jeffrey Epstein ever tell you  
 7 that Prince Andrew had sex with Virginia  
 8 Roberts?  
 9 A. He did not.  
 10 Q. Did Prince Andrew ever visit -- let  
 11 me back up for a moment. We talked about  
 12 Jeffrey's homes, did Jeffrey have a home in  
 13 the U.S. Virgin islands called Little St.  
 14 James?  
 15 A. Yes.  
 16 Q. Did Prince Andrew ever visit that  
 17 island -- are you aware of Prince Andrew ever  
 18 visiting Jeffrey's island?  
 19 A. I am aware of that, yes.  
 20 Q. Do you know how many times he  
 21 visited?  
 22 A. I do not.  
 23 Q. Do you know if he visited when  
 24 Virginia was on the island?  
 25 A. I do not.

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1 G Maxwell - Confidential  
 2 Q. Were you present on the island when  
 3 Prince Andrew visited?  
 4 A. Yes.  
 5 Q. How many times?  
 6 A. I can only remember once.  
 7 Q. Were there any girls under the age  
 8 of 18 on the island during that one visit  
 9 that you remember that were not family or  
 10 friends of or daughters of your friends?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. There were no girls on the island  
 14 at all. No girls, no women, other than the  
 15 staff who work at the house. Girls meaning,  
 16 I assume you are asking underage, but there  
 17 was nobody female outside of the cooks and  
 18 the cleaners.  
 19 Q. Did you, as part of your duties in  
 20 working for Jeffrey, ever arrange for  
 21 Virginia to have sex with John Luc Brunel?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Just for the record, I have never  
 25 at any time, at anyplace, in any moment ever

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1 G Maxwell - Confidential  
 2 asked Virginia Roberts or whatever she is  
 3 called now to have sex with anybody.  
 4 Q. Did you ever provide Virginia  
 5 Roberts with an outfit, an outfit of a sexual  
 6 nature to wear for Les Wexner?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I think we addressed the outfit  
 10 issue.  
 11 Q. I am asking you if you ever  
 12 provided her with an outfit of a sexual  
 13 nature to wear for Les Wexner?  
 14 A. Categorically no. You did get  
 15 that, I said categorically no  
 16 Q. Don't worry I'm paying attention.  
 17 A. You seemed very distracted in that  
 18 moment.  
 19 (Maxwell Exhibit 6, flight logs,  
 20 marked for identification.)  
 21 A. Do you mind if I take a break for  
 22 the bathroom.  
 23 Q. It's 11:08 and we are going to go  
 24 off the record now.  
 25 THE VIDEOGRAPHER: It's now 11:09.

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1 G Maxwell - Confidential  
 2 We are off the record.  
 3 (Recess.)  
 4 THE VIDEOGRAPHER: It's now 11:26,  
 5 we are back on the record and starting  
 6 disk No. 3.  
 7 Q. Ms. Maxwell, I think I handed you  
 8 right before the break, did I hand you the  
 9 flight logs, they look like this. Did I mark  
 10 those yet, I thought I did.  
 11 A. I don't believe I have it.  
 12 Q. These admittedly are a little  
 13 difficult to read so what I'm going to  
 14 provide you with to assist is I have a chart  
 15 that has the airport codes, because it will  
 16 have, for example, just for the record  
 17 reflects that the first page of document  
 18 [REDACTED] it will have a code in the from line  
 19 that says PBI, for example, to TEB so I a  
 20 chart that matches up, just in case you don't  
 21 understand what those letters mean, PBI  
 22 meaning Palm Beach, TEB meaning Teterboro,  
 23 which is New Jersey, but others are more  
 24 difficult but just for you to be able to  
 25 understand the logs, I will provide you with

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1 G Maxwell - Confidential  
 2 that.  
 3 MR. PAGLIUCA: So we are clear, if  
 4 the witness has personal knowledge of  
 5 what these are that's fine but I don't  
 6 know what these are and I don't expect  
 7 the witness to accept the representation  
 8 that they are what they are.  
 9 MS. McCAWLEY: If she can testify  
 10 to what city it is, she can state that  
 11 on the record.  
 12 MR. PAGLIUCA: If she knows what it  
 13 is, she knows what it is, we are not  
 14 putting any affirmatively on the record  
 15 until you ask your questions.  
 16 Q. So I'm going to ask you and I think  
 17 we flagged a few of the pages which may  
 18 direct us a little bit easier but I will do  
 19 it by Bates number which is at the bottom of  
 20 the document kind of at the side.  
 21 The first I will direct your  
 22 attention to is [REDACTED]  
 23 A. Does it have a tab?  
 24 Q. It should. Let me make sure.  
 25 A. Yes it does.

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1 G Maxwell - Confidential  
 2 Q. So I'm directing your attention to  
 3 the bottom, two lines up from the bottom,  
 4 there is a flight --  
 5 MR. PAGLIUCA: Are you on [REDACTED]  
 6 MS. McCAWLEY: [REDACTED]  
 7 Q. So this flight is from, the one I'm  
 8 looking at, I think it's highlighted on your  
 9 copy. On the far corner on the date, it says  
 10 [REDACTED] at the top and this would be the [REDACTED]  
 11 and then the [REDACTED] are the two I'm going to  
 12 direct your attention to.  
 13 Q. On that first one on the [REDACTED] you  
 14 will see the column reading PBI in the from  
 15 column to TEB in the to column and you will  
 16 see some initials, you will see JE for  
 17 Jeffrey Epstein, GM for Ghislaine Maxwell, ET  
 18 for Emmy Taylor and then Virginia?  
 19 A. I have to object.  
 20 MR. PAGLIUCA: You don't get to  
 21 object.  
 22 Q. She is turning into a lawyer  
 23 already?  
 24 A. I would like to.  
 25 Q. Let me ask the question and if you

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1 G Maxwell - Confidential  
 2 have an issue -- so with respect to this  
 3 flight, do you recall being on a flight in  
 4 the -- [REDACTED] going from Palm Beach to  
 5 Teterboro?  
 6 A. No, I don't recall any specific  
 7 flight.  
 8 Q. Do you recall flying with Virginia  
 9 on a flight with Emmy Taylor and Jeffrey  
 10 Epstein at any time?  
 11 A. I don't.  
 12 Q. How often did you fly on a plane  
 13 with a 17 year old?  
 14 MR. PAGLIUCA: Objection to form  
 15 and foundation.  
 16 A. I have no idea what you are talking  
 17 about, other than friends of mine that had  
 18 kids.  
 19 Q. Did you regularly fly on Jeffrey's  
 20 plane with individuals who were under the age  
 21 of 18?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Can you repeat the question?  
 25 Q. Did you regularly fly on Jeffrey

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1 G Maxwell - Confidential  
 2 Epstein's planes with individuals who were  
 3 under the age of 18?  
 4 A. I regularly flew on Jeffrey  
 5 Epstein's airplane but I cannot testify as to  
 6 flying with people under the age. I don't  
 7 believe that I did.  
 8 Q. Why wouldn't you remember flying  
 9 with a 17 year old?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. How would I know, one, that she is  
 13 17, how would you know that, how do you know  
 14 I'm on the plane.  
 15 Q. Are you saying you are not on this  
 16 flight, so this is a Palm Beach to Teterboro.  
 17 This says the JE, GM ET and Virginia. The GM  
 18 you are saying is not you?  
 19 MR. PAGLIUCA: I object to the  
 20 form. You can answer the question if  
 21 you know.  
 22 A. How do you know the GM is me.  
 23 Q. Is it your testimony that on the  
 24 flight logs when it represents GM that it is  
 25 not you flying on the plane?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. GM can stand for any level, it  
 5 could be Georgina, George.  
 6 Q. Are there any people that flew with  
 7 Jeffrey Epstein that had the initials GM?  
 8 A. I don't know.  
 9 Q. Do you recall flying with Jeffrey  
 10 Epstein on his plane over 300 times during  
 11 the period of 1999 to 2005?  
 12 A. I cannot testify to how many times  
 13 I was on his plane because that would just be  
 14 impossible.  
 15 Q. You were on his plane regularly,  
 16 would you say?  
 17 A. I already testified I was on his  
 18 plane regularly.  
 19 Q. Is it your testimony and I'm  
 20 referring now to the line that we were just  
 21 talking about that you were not on the flight  
 22 from Palm Beach to Teterboro that lists JE,  
 23 GM, ET and Virginia?  
 24 A. I am not testifying to that. I am  
 25 just saying that you cannot be sure that is

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1 G Maxwell - Confidential  
 2 me.  
 3 Q. So as you sit here today, you don't  
 4 believe you flew on that plane?  
 5 A. I'm not saying that. I'm just  
 6 saying you cannot be sure that's me.  
 7 Q. Do you have reason to doubt that  
 8 when it says GM on these flight logs that  
 9 that represents you?  
 10 A. I cannot testify to that. I'm just  
 11 saying it may not be me.  
 12 Q. In looking at the flight logs and  
 13 look up, let's move up a couple of lines. If  
 14 you start at the top, you are going to see  
 15 JE, [REDACTED], then JE, AP, [REDACTED],  
 16 JE, AP [REDACTED] JE, GM, JE, GM, JE, GM,  
 17 Ricardo Loretta, reposition, JE, GM, JE, GM  
 18 ET Kelly Spamm, JE, GM, Kelly Spamm, Tom  
 19 Pritzer, female, Marham Air Force  
 20 repositioning. JE, GM, ET, Kelly Spamm, JE,  
 21 GM, ET, Kelly Spamm, JE, GM, ET, Virginia,  
 22 JE, GM, AP, Virginia, repositioning and then  
 23 a certification.  
 24 So is it your testimony in looking  
 25 at that that you do not believe that the GM

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1 G Maxwell - Confidential  
 2 represents you?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. I'm not saying that. I'm just  
 6 saying that you cannot -- I can't sit here  
 7 and tell you for sure GM is me and I cannot  
 8 testify remembering being on a flight at that  
 9 time.  
 10 Q. You don't remember being on any of  
 11 these flights with the initial GM?  
 12 A. I remember being on many flights.  
 13 I cannot testify that is a flight I am on.  
 14 Q. Let's go to the next page which is  
 15 going to be [REDACTED] I want you to look at  
 16 line -- so the date is at the top, so it's  
 17 [REDACTED] and if you go down, you will see  
 18 a line that says the [REDACTED] and if you scroll  
 19 over you will see PBI to TIST, if you look at  
 20 the airport codes, TIST is going to be  
 21 representative for the U.S. Virgin Islands  
 22 and then you will see the list on the plane  
 23 JE, GM, ET and Virginia Roberts.  
 24 Do you recall flying from Palm  
 25 Beach to the U.S. Virgin Islands with

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1 G Maxwell - Confidential  
 2 Jeffrey, yourself, Emmy Taylor and Virginia  
 3 Roberts?  
 4 MR. PAGLIUCA: I object to the form  
 5 and just so the record is clear, we  
 6 don't agree with whatever your  
 7 characterizations are. The document  
 8 speaks for itself and she can answer  
 9 based on whatever her personal knowledge  
 10 is.  
 11 MS. McCAWLEY: I understand.  
 12 Q. Do you recall flying with those  
 13 individuals from Palm Beach to the U.S.  
 14 Virgin Islands?  
 15 A. I have no recollection of any  
 16 individual flight you are pointing out here.  
 17 You are talking about 2001, how many years  
 18 ago is that?  
 19 Q. I'm asking the questions.  
 20 A. I'm not being difficult. I'm just  
 21 asking, it's like 14, 15 years ago, it's  
 22 impossible, I'm sorry.  
 23 Q. So your testimony is you don't  
 24 recall flying on that flight with Virginia  
 25 Roberts?

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1 G Maxwell - Confidential  
 2 A. I cannot testify to that flight.  
 3 Q. Let's look at the next flight which  
 4 is on the [REDACTED] from the Virgin Islands back  
 5 to Palm Beach, JE, Jeffrey Epstein, Ghislaine  
 6 Maxwell, Emmy Taylor, Virginia Roberts, the  
 7 same individuals on the above flight.  
 8 A. It doesn't say my name, it has some  
 9 initials.  
 10 Q. I understand, the initials GM.  
 11 Do you recall flying on a plane, on  
 12 one of Jeffrey's planes from the Virgin  
 13 Islands to Palm Beach with Virginia Roberts?  
 14 A. I do not.  
 15 Q. Was there any other person that  
 16 flew with Jeffrey Epstein with frequency  
 17 during that time period in these logs that  
 18 have the initials GM?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I would have to look at all the  
 22 flight logs, I have no idea, I flew  
 23 frequently.  
 24 Q. Why don't you take a look at the  
 25 next three pages and see if that refreshes

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1 G Maxwell - Confidential  
 2 your recollection.  
 3 MR. PAGLIUCA: You are talking  
 4 about [REDACTED]  
 5 MS. McCAWLEY: She can pick any  
 6 couple of pages, those have a lot of the  
 7 individuals on them so that is a good  
 8 sampling.  
 9 MR. PAGLIUCA: So pick any pages  
 10 you want.  
 11 Q. Does that refresh your recollection  
 12 at all as to whether GM represents you or  
 13 some other individual?  
 14 A. Again, I can't testify whether that  
 15 represents me or not, I don't see any other  
 16 GMs but you have to understand that even if  
 17 my name is on that record doesn't mean I was  
 18 on the flight.  
 19 Q. So are you contesting the accuracy  
 20 of the flight logs? In other words, you said  
 21 it doesn't represent you are on the flight so  
 22 is it your testimony just because a name is  
 23 listed doesn't mean they were actually on the  
 24 flight?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I can't testify to what -- these  
 4 are records that were produced by Dave Rogers  
 5 is on here, so these aren't federally  
 6 mandated records, so I can't testify to what  
 7 he produced.  
 8 Q. I would like you to turn to page,  
 9 at the bottom, the Bates number is [REDACTED]  
 10 And the month is [REDACTED]  
 11 A. Okay.  
 12 Q. If you go down to the number that  
 13 is [REDACTED] that would be [REDACTED], you're  
 14 going to see on that line an [REDACTED] which is a  
 15 [REDACTED] and then you  
 16 will see [REDACTED] which is going to be, I'm going  
 17 to pronounce it incorrectly, [REDACTED]  
 18 [REDACTED] I'm sure I'm not pronouncing that  
 19 correctly. Then you will see in the list,  
 20 you will see JE, GM, SK, President Clinton,  
 21 Doug Band, it looks like --  
 22 A. I believe it says male.  
 23 Q. Yes. Then [REDACTED] I  
 24 believe. Is that GM on this page  
 25 representative of you?

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1 G Maxwell - Confidential  
 2 A. Well, this would be a flight that I  
 3 would potentially remember with Bill Clinton  
 4 on it but I don't actually recall going to  
 5 Russia.  
 6 Q. Are those your initials, do you  
 7 recall being on the flight?  
 8 A. Those are my initials with  
 9 President Clinton, I don't recall this flight  
 10 either, but I would be more likely to if I  
 11 had a bit more time to study the timing of  
 12 this.  
 13 Q. Your testimony is you don't recall  
 14 flying with President Clinton from [REDACTED] to  
 15 [REDACTED].  
 16 A. I don't recall the [REDACTED] to [REDACTED]  
 17 flight. I have definitely flown with  
 18 President Clinton.  
 19 Q. On that same page you will see  
 20 beneath there, beneath 22 you will see the  
 21 indication, same as above, same as above,  
 22 same as above in the column that originally  
 23 had the initials.  
 24 A. Uh-huh.  
 25 Q. And the names.

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1 G Maxwell - Confidential  
 2 A. Uh-huh.  
 3 Q. Do you recall flying with President  
 4 Clinton from [REDACTED] to [REDACTED]  
 5 [REDACTED].  
 6 A. I do.  
 7 Q. So the GM that would be represented  
 8 in that column would be you?  
 9 A. I recall going to [REDACTED] with the  
 10 president so that is likely to be me.  
 11 Q. You were on Jeffrey's plane for  
 12 that trip?  
 13 A. I believe I was.  
 14 Q. Do you know who [REDACTED]  
 15 is?  
 16 A. I do not.  
 17 Q. I'm going back towards the front  
 18 which is going to be [REDACTED] please. And  
 19 you're going to see --  
 20 A. Hang on I'm not --  
 21 Q. Take your time.  
 22 A. Okay.  
 23 Q. You are going to see in the date  
 24 column, you will see [REDACTED] and then about  
 25 halfway down you will see [REDACTED] and

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1 G Maxwell - Confidential  
 2 then you will see the [REDACTED] which  
 3 is the column which is where I want you to  
 4 start looking at the log and there you're  
 5 going to see [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 A. Okay.  
 12 Q. If you look at the column, if you  
 13 go back up to the top on the [REDACTED] if you look  
 14 at the column you will see JE, GM, ET,  
 15 Virginia Roberts and I believe it says [REDACTED]  
 16 [REDACTED] sorry I'm not reading that very  
 17 well.  
 18 Do you recall flying from, if you  
 19 see the dates, the [REDACTED] and  
 20 [REDACTED] Do you recall a trip that went from  
 21 the United States to Canada and to the places  
 22 I just mentioned where Virginia Roberts was  
 23 on the plane with you?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. I already testified that I don't  
 3 recall Virginia on any of these flights.  
 4 Q. I would like to mark, as Maxwell 7,  
 5 I will put it at the top?  
 6 (Maxwell Exhibit 7, photo, marked  
 7 for identification.)  
 8 MR. PAGLIUCA: Has this document  
 9 been produced in discovery?  
 10 MS. McCAWLEY: Yes.  
 11 MR. PAGLIUCA: Do you have a Bates  
 12 number?  
 13 MS. McCAWLEY: This one doesn't.  
 14 Q. I'm going to ask you --  
 15 MR. PAGLIUCA: I don't recall  
 16 seeing this document so I would like to  
 17 see a Bates number document before we  
 18 ask questions about it.  
 19 MS. McCAWLEY: Can you go look for  
 20 it and I will continue. We will set  
 21 that aside until we get a Bates number.  
 22 You may want to leave that log up and  
 23 set it to the side and we will bounce  
 24 back to that.  
 25 Q. Do you recall -- I think earlier

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1 G Maxwell - Confidential  
 2 you said you visited Jeffrey's island, I  
 3 think they called it St. Jeffrey or St.  
 4 James, the U.S. Virgin Island home.  
 5 A. St. James.  
 6 Q. Do you recall whether President  
 7 Clinton was ever on that island?  
 8 A. Categorically, definitively,  
 9 absolutely, without a shadow of a doubt, when  
 10 I was present or any other time that I am  
 11 aware of, was President Clinton ever on that  
 12 island, I do not believe he went to that  
 13 island ever ever, that is an absolute  
 14 fabrication and an absolute flat out lie.  
 15 Q. Was President Clinton or former  
 16 President Clinton ever at any of Jeffrey  
 17 Epstein's homes when you present, other than  
 18 the island I know you said that did not  
 19 happen, the home in either New York or Palm  
 20 Beach or New Mexico?  
 21 A. I do not believe at any time  
 22 President Clinton was at any of Jeffrey's  
 23 homes, I have absolutely no knowledge or  
 24 otherwise that he was ever there.  
 25 Q. You don't recall having dinner with

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1 G Maxwell - Confidential  
 2 him at any of those homes?  
 3 A. Again, Virginia is absolutely  
 4 totally lying. This is a subject of  
 5 defamation about Virginia and the lies she  
 6 has told and one of lies she told was that  
 7 President Clinton was on the island where I  
 8 was present. Absolutely 1000 percent that is  
 9 a flat out total fabrication and lie.  
 10 Q. You did fly on planes, Jeffrey  
 11 Epstein's planes with President Clinton, is  
 12 that correct?  
 13 A. I have flown, yes.  
 14 Q. Would it be fair to say that  
 15 President Clinton and Jeffrey are friends?  
 16 A. I wouldn't be able to characterize  
 17 it like that, no.  
 18 Q. Are they acquaintances?  
 19 A. I wouldn't categorize it.  
 20 Q. He just allowed him to use his  
 21 plane?  
 22 A. I couldn't categorize Jeffrey's  
 23 relationship.  
 24 Q. When you were on the plane with  
 25 Jeffrey and President Clinton, did you

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1 G Maxwell - Confidential  
 2 observe Jeffrey and President Clinton  
 3 talking?  
 4 A. I'm sure they did.  
 5 Q. Did they seem friendly?  
 6 A. I don't recollect.  
 7 Q. Was Epstein one of the original  
 8 people that conceived the Clinton global  
 9 initiative?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 Q. Do you know?  
 13 A. I don't have -- I don't know what  
 14 you are talking about.  
 15 Q. You don't know what I'm talking  
 16 about.  
 17 Did you ever, not at one of houses,  
 18 but did you ever eat dinner with President  
 19 Clinton and Jeffrey Epstein?  
 20 A. Are you just talking in general  
 21 anywhere.  
 22 Q. In general?  
 23 A. I believe on a plane of this nature  
 24 we would have had a meal.  
 25 Q. But not outside of the travel on

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1 G Maxwell - Confidential  
 2 the flights?  
 3 A. I can't recollect having a meal  
 4 with them, but just so we are clear, the  
 5 allegations that Clinton had a meal on  
 6 Jeffrey's island is 100 percent false.  
 7 Q. But he may have had a meal on  
 8 Jeffrey's plane?  
 9 A. I'm sure he had a meal on Jeffrey's  
 10 plane.  
 11 Q. You do know how many times he flew  
 12 on Jeffrey's plane?  
 13 A. I don't.  
 14 Q. Do you know who Doug Band is?  
 15 A. I do.  
 16 Q. How do you know him?  
 17 A. He used to work or still works for  
 18 Bill Clinton.  
 19 Q. Did you ever have a relationship  
 20 with him?  
 21 A. We are talking about adult  
 22 consensual relationships, it's off the  
 23 record.  
 24 Q. I'm not asking what you did with  
 25 him, I'm asking if you ever had a

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1 G Maxwell - Confidential  
 2 relationship with him?  
 3 MR. PAGLIUCA: If you understand  
 4 the term relationship, certainly you can  
 5 answer that.  
 6 A. Define relationship.  
 7 Q. Somebody that you would have spent  
 8 time together, either seeing them in a  
 9 romantic relationship or --  
 10 A. You need to be, what do you mean by  
 11 romantic. I was friends with Doug but you  
 12 are suggesting something more so I want to be  
 13 clear what you are actually asking me.  
 14 Q. You defined it. You said you were  
 15 friends with him. If that's what you were  
 16 that's all I need to know.  
 17 While you were on the trip with  
 18 President Clinton, do you recall where you  
 19 stayed at these locations, in other words,  
 20 would you leave the jet and stay overnight at  
 21 a hotel, do you have a recollection of this  
 22 trip?  
 23 A. I recollect the trip but if you're  
 24 asking me where we stayed, you can see it's a  
 25 very fast paced trip. It was very tiring and

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1 G Maxwell - Confidential  
 2 I don't recollect where we stayed.  
 3 Q. Do you recollect if you stayed at  
 4 the same place President Clinton stayed? In  
 5 other words, if you left the plane to go a  
 6 hotel did you all go together is your  
 7 recollection?  
 8 A. I honestly don't recollect, no.  
 9 Q. Part of this trip we were just  
 10 talking about, there is a flight that goes to  
 11 Thailand, do you remember being in Thailand?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. Are you asking me --  
 15 Q. On the President Clinton trip.  
 16 A. Are you referencing something?  
 17 Q. The part that, let me make sure  
 18 I've got it here. The entry that would be  
 19 the Thailand, would be the one -- let me make  
 20 sure I'm correct. I have you on the wrong  
 21 page, it's actually the page before. It's  
 22 going to be [REDACTED] And it's going to be the  
 23 entry on [REDACTED] starting on [REDACTED] and then  
 24 it goes down to where it has the same as  
 25 above, to [REDACTED] -- I'm saying

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1 G Maxwell - Confidential  
 2 [REDACTED]  
 3 MR. PAGLIUCA: That's what the  
 4 document says.  
 5 Q. I'm not representing the date but  
 6 there it is. So the last leg of that where  
 7 it says same as above has, the second to  
 8 last, I'm sorry on the 2 [REDACTED]  
 9 [REDACTED]  
 10 Do you remember being in Thailand  
 11 with President Clinton?  
 12 A. I do.  
 13 Q. Do you remember what the purpose of  
 14 that trip was?  
 15 A. I don't.  
 16 Q. Do you know whether -- do you  
 17 recall, did you stay the night in Thailand?  
 18 A. I don't recall.  
 19 Q. Do you recall why you went to  
 20 Thailand?  
 21 A. I don't recall.  
 22 Q. Who is Andrea Mitrovich?  
 23 A. She I believe was a stewardess on  
 24 this flight.  
 25 Q. Did she perform any massages on the

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1 G Maxwell - Confidential  
 2 flight?  
 3 A. I don't recollect any massages on  
 4 the flight.  
 5 Q. Do you know who [REDACTED] is?  
 6 A. It doesn't -- no I don't know who  
 7 that is, I can't recall.  
 8 Q. This is not in color, it's a black  
 9 and white but it has the Bates label on it.  
 10 Should I take the sticker off the one that  
 11 has -- I don't know if you want to swap it.  
 12 MR. PAGLIUCA: Let the record  
 13 reflect I am replacing this on the black  
 14 and white copy of this exhibit with  
 15 [REDACTED]  
 16 Q. So, we were talking earlier, we  
 17 were looking at the flight logs and we were  
 18 talking about a trip and let me just get you  
 19 back to the page. [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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1 G Maxwell - Confidential  
 2 Q. Can I direct your attention to the  
 3 picture, please.  
 4 A. Of course.  
 5 Q. Can you tell me who is in this  
 6 picture, who is pictured here, and for the  
 7 court reporter's benefit, can you go from the  
 8 left of the picture to the right of the  
 9 picture, to the extent you can identify the  
 10 individuals?  
 11 A. Sure. I cannot identify the person  
 12 on the left, I cannot identify the person  
 13 next left. I can identify Jeffrey Epstein.  
 14 I cannot identify the next person to his  
 15 right and the next person in the picture is  
 16 myself.  
 17 Q. Is the individual all the way to  
 18 the left at the beginning of the picture,  
 19 does that resemble Emmy Taylor. You might  
 20 want to look at the color version if that  
 21 helps you at all, I know it's not the marked  
 22 one. I don't if that's easier to see, they  
 23 are both dark.  
 24 A. That does not look like Emmy Taylor  
 25 at all.

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1 G Maxwell - Confidential  
 2 Q. Do you recall --  
 3 MR. PAGLIUCA: Let's mark this then  
 4 as deposition Exhibit 8 since we are  
 5 referring to it and then you can give us  
 6 copies as well.  
 7 MS. MENNINGER: It's different  
 8 because it has other people in this  
 9 color photo.  
 10 (Maxwell Exhibit 8, photo, marked  
 11 for identification.)  
 12 Q. Do you recall who took this  
 13 photograph?  
 14 A. I do not.  
 15 Q. Do you recall this photograph being  
 16 taken by Virginia?  
 17 A. First of all, I don't know where we  
 18 are.  
 19 Q. So you don't recognize the  
 20 building?  
 21 A. I don't recognize the building and  
 22 I don't recognize -- the only two people I  
 23 recognize in the picture are Jeffrey and  
 24 myself.  
 25 Q. Does this like look a picture of a

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1 G Maxwell - Confidential  
 2 building that you would have seen when you  
 3 were on the trip in Europe?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I can't possibly answer that.  
 7 Q. Do you recall Virginia ever taking  
 8 pictures?  
 9 A. I barely recall Virginia, period.  
 10 Q. Do you recall her ever taking  
 11 pictures?  
 12 A. No, I don't.  
 13 Q. I'm going to direct your attention,  
 14 still within the flight logs to -- starting  
 15 on the next page from where you just were  
 16 which is going to be [REDACTED] And the date at  
 17 the top says [REDACTED] you will see [REDACTED] and I'm  
 18 directing your attention down towards the  
 19 middle to the bottom where you will see the  
 20 numbers [REDACTED]  
 21 A. Uh-huh.  
 22 Q. And we've got actually I'm going to  
 23 direct your attention to the one that starts  
 24 [REDACTED]  
 25 [REDACTED]

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1 G Maxwell - Confidential  
 2 and in the line, the remarks line you will  
 3 see JE, GM, AP, VR, BK, Marvin Minski and  
 4 [REDACTED]  
 5 MR. PAGLIUCA: Are you reading the  
 6 29th, is that what you're reading?  
 7 MS. McCRAWLEY: I'm reading the  
 8 29th, yes.  
 9 Q. Below that you will see JE, GM, AP,  
 10 VR, [REDACTED] and Marvin  
 11 Minski.  
 12 Do you see that?  
 13 A. I do.  
 14 Q. Do you recall a trip from Teterboro  
 15 to Santa Fe and Santa Fe back to Palm Beach  
 16 with these individuals?  
 17 A. I don't.  
 18 Q. Do you recall being on a plane with  
 19 [REDACTED] and Virginia Roberts?  
 20 A. I don't.  
 21 Q. Do you recall ever witnessing any  
 22 sexual interaction on one of Jeffrey's planes  
 23 with any of these individuals?  
 24 A. I do not, absolutely not.  
 25 Q. Did Jeffrey have a fold out bed on



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1 G Maxwell - Confidential  
 2 one of his planes?  
 3 A. There was a bed on one of his  
 4 planes that folded out, yes.  
 5 Q. Do you recall whether with respect  
 6 to this being in Santa Fe, do you recall  
 7 whether you were there for some form of a  
 8 party?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I don't recall the trip at all and  
 12 this looks like a total work trip, not a  
 13 party trip.  
 14 Q. What would be the difference  
 15 between a work trip and a party trip?  
 16 A. Just that I would be on trips for  
 17 work and I believe that this looks like, AP  
 18 looks like it's one of the -- probably one of  
 19 the designers and the time would meet with a  
 20 trip to decorate the house, just the timing  
 21 of it.  
 22 Q. So would Virginia be brought on  
 23 trips that were for the purpose of work and  
 24 decorating the house?  
 25 A. Like I said, I never worked with

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1 G Maxwell - Confidential  
 2 her but you would have to ask Jeffrey what he  
 3 brought her on the trip for.  
 4 Q. But she would travel with him when  
 5 there was a work trip like this?  
 6 A. I can't -- I'm seeing that she is  
 7 on this flight but I have no idea what she is  
 8 doing, he invited her, it would not be my  
 9 job.  
 10 Q. What about [REDACTED] would she  
 11 regularly travel with Jeffrey on flights?  
 12 A. I have no idea, you would have to  
 13 look through the flight logs. I have no  
 14 idea.  
 15 Q. Your recollection is -- what is  
 16 your recollection, do you recollect [REDACTED]  
 17 traveling often on flights with Jeffrey?  
 18 A. Absolutely not. No, not at all. I  
 19 don't recollect her actually on the flight at  
 20 all.  
 21 Q. I think you can set that aside for  
 22 the moment.  
 23 (Maxwell Exhibit 9, message pad  
 24 pages, marked for identification.)  
 25 Q. We will mark as Exhibit 9 these

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1 G Maxwell - Confidential  
 2 excerpts from -- we will identify what they  
 3 are but from the message pads.  
 4 Did you want to correct anything?  
 5 A. I want to make an addendum.  
 6 Would you mind rereading the last  
 7 question back to me?  
 8 (Record read.)  
 9 A. I also just want to say that at  
 10 this point I cannot recollect flying to  
 11 parties. Jeffrey went for work so -- was  
 12 this in Santa Fe, this flight as well.  
 13 Q. The flight we were looking at, yes  
 14 but it was to Santa Fe --  
 15 A. I don't recall going to any parties  
 16 in Santa Fe at any time but certainly flying  
 17 to Santa Fe for a party seems highly  
 18 improbable.  
 19 Q. So I'm going to direct your  
 20 attention to the document that I set before  
 21 you which is Bates number [REDACTED] and it  
 22 has different Bates numbers because it's a  
 23 smaller version of the larger production.  
 24 These are the pages I will be asking about.  
 25 In the time that you were working

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1 G Maxwell - Confidential  
 2 with Jeffrey in Palm Beach, do you recall a  
 3 process for taking, anybody at the house  
 4 taking messages when incoming phone calls  
 5 came in?  
 6 A. You are supposed to take a message  
 7 and receive the message and write the message  
 8 down. Who was the message was for, what time  
 9 it was taken and who took it and what the  
 10 message was, obviously.  
 11 Q. Does what's in front of you look  
 12 familiar with respect to the message pads  
 13 that you would have used at the house?  
 14 A. It is familiar.  
 15 Q. I'm going to direct your attention  
 16 to the second page of it?  
 17 MR. PAGLIUCA: These all have SAO  
 18 numbers on them or Bates ranges and I  
 19 don't see any of your Bates ranges on  
 20 these. I know you have produced message  
 21 pads but those have your Bates range  
 22 numbers on them and I'm wondering if  
 23 these are different documents.  
 24 MS. McCRAWLEY: It's the same, just  
 25 ours have the Bates underneath them.

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1 G Maxwell - Confidential  
 2 These were produced as part of the rule  
 3 26 discovery. We can get the additional  
 4 Bates if you want.  
 5 Q. The one I'm asking about first is  
 6 the [REDACTED] You can look at that and then  
 7 I will identify the Bates number referenced  
 8 in this case.  
 9 I want to direct your attention to  
 10 the top right-hand corner just so I have an  
 11 understanding of how these messages were  
 12 taken. So I see that it says at the top it  
 13 says in the for line it says Ms. Maxwell and  
 14 the date of 4/25/04 and then I see under the  
 15 M line it looks like Necole Hesse or  
 16 something like that, a phone number and a  
 17 message saying returning your call and on the  
 18 bottom it looks like [REDACTED]  
 19 Explain to me, is this -- does this  
 20 represent Rushi taking down a message for you  
 21 from Ms. Hesse, is that how these work?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation. Go ahead.  
 24 Q. My question is, I'm trying to  
 25 understand how the messages were taken.

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1 G Maxwell - Confidential  
 2 Looking at this message pad, where it says  
 3 signed [REDACTED] can you tell me who [REDACTED] was?  
 4 A. I cannot.  
 5 Q. You do not know.  
 6 Typically when these messages were  
 7 taken in your practice when you were there,  
 8 would the individual who took the message  
 9 write their name on the message?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I don't recollect, you can ask who  
 13 wrote it so you can find out who it was.  
 14 Q. Do you know who Necole Hesse is?  
 15 A. I don't.  
 16 Q. I'm going to direct your  
 17 attention -- do we have a Bates number for  
 18 that?  
 19 MR. EDWARDS: [REDACTED]  
 20 Q. Giuffre [REDACTED] for that one.  
 21 I will direct your attention to the  
 22 first page which has the [REDACTED] on it.  
 23 A. Okay.  
 24 Q. Now at the top of that document, on  
 25 the right-hand side, the message that reads

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1 G Maxwell - Confidential  
 2 for JE, date 1/02/03, message Caroline Casey  
 3 and then it's signed GM.  
 4 Is that your signature?  
 5 A. That's not my handwriting.  
 6 Q. Would other people take a message,  
 7 how did this process work, is there someone  
 8 else in the house with the initials GM?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I cannot answer that. It's not my  
 12 handwriting.  
 13 Q. I'm trying to understand how this  
 14 gets there. If you took a message and didn't  
 15 write it down, would someone else record that  
 16 message for you?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. All I can tell you, this is not my  
 20 handwriting so I cannot -- I have no idea  
 21 what that is.  
 22 Q. Was the practice that, what was the  
 23 practice when someone answered the phone with  
 24 these message pads, what were they supposed  
 25 to do?

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1 G Maxwell - Confidential  
 2 A. They were supposed to take a  
 3 message and the time and date and give the  
 4 message.  
 5 Q. Were they supposed to indicate who  
 6 took the message?  
 7 A. They were but it wasn't -- I don't  
 8 really recall the actual process. I can see  
 9 from here it looks like you were supposed to  
 10 but that's not my handwriting so I can't say  
 11 what that was.  
 12 Q. Do you know who Caroline Casey is?  
 13 A. No, I don't.  
 14 Q. Do you know whether Caroline Casey  
 15 was under the age of 18?  
 16 A. I just testified I couldn't  
 17 remember who she was so it would be difficult  
 18 to know how old she was.  
 19 Q. Do you know if she was coming to  
 20 the house to provide massages?  
 21 A. I don't remember who she is at all,  
 22 so no.  
 23 Q. And then I would like to direct  
 24 your attention to the message right  
 25 underneath it. Which says JE, [REDACTED] Amanda

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1 G Maxwell - Confidential  
 2 and has a phone number and the message says,  
 3 wants to know if she should bring her friend  
 4 [REDACTED] tonight.  
 5 What is that message referring to?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I can't possibly know.  
 9 Q. Did individuals at the house take  
 10 messages for underage girls to come over and  
 11 bring friends for the purpose of providing  
 12 massages?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. How would I possibly know what you  
 16 are talking about.  
 17 Q. Did you record messages at the  
 18 house?  
 19 A. It's not my job.  
 20 Q. You did from time to time record  
 21 messages?  
 22 A. Hardly ever.  
 23 Q. But you did from time to time do  
 24 it?  
 25 A. I'm just saying I hardly ever took

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1 G Maxwell - Confidential  
 2 messages, very, very, very, very  
 3 infrequently.  
 4 Q. Do you know if Amanda brought her  
 5 friend [REDACTED] over on that night?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. One, I don't know what this message  
 9 is, I don't know if I was in Palm Beach, I  
 10 don't know who Amanda is, I don't know who  
 11 [REDACTED] is and I don't know what this message  
 12 is referring to.  
 13 Q. So on January 2nd of 2003, were you  
 14 in Palm Beach?  
 15 A. I don't know.  
 16 Q. Where would you have been other  
 17 than Palm Beach at the time?  
 18 A. I could have been anywhere.  
 19 Q. Where did you typically live?  
 20 A. What are you asking me?  
 21 Q. So for example, in 2003, where was  
 22 your primary residence, was it wherever  
 23 Jeffrey was living and staying or was it  
 24 independent of that?  
 25 A. What was the date again.

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1 G Maxwell - Confidential  
 2 Q. In 2003?  
 3 A. The end of 2003?  
 4 Q. January, the beginning.  
 5 A. I don't know, I could have been  
 6 anywhere, Jeffrey and I were leading almost  
 7 separate lives by then.  
 8 Q. If you were at the house that day,  
 9 did you recall seeing anybody by the name of  
 10 [REDACTED]  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I don't know if I was at the house,  
 14 so I can't testify to that.  
 15 Q. Let's flip back to the next page,  
 16 the one we were on before the [REDACTED] the  
 17 message towards the bottom that says, for  
 18 Jeffrey, message of Ghislaine. And it says,  
 19 Would it be helpful to have and then redacted  
 20 come to Palm Beach today to stay here and  
 21 help train new staff with Ghislaine. Who  
 22 were you referring to in that message; do you  
 23 remember?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 Q. The question is, do you recall this  
 3 message?  
 4 A. I do not recall this message.  
 5 Q. Do you recall training a female  
 6 under the age of 18 at Jeffrey's home?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I never trained a female under the  
 10 age of 18 at Jeffrey's home.  
 11 Q. Did you ever say it would be  
 12 helpful to have a female under the age of 18  
 13 come to Palm Beach today to stay here and  
 14 help train new staff with Ghislaine?  
 15 A. I never asked anyone under the age  
 16 of 18 come to help train new staff.  
 17 Q. I'm going to flip to the next page  
 18 which is [REDACTED].  
 19 A. By the way, that is not my  
 20 handwriting and it's not dated and I couldn't  
 21 possibly tell you who that is.  
 22 Did you hear that?  
 23 Q. You got your testimony on the  
 24 record.  
 25 2832.

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1 G Maxwell - Confidential  
 2 A. Yes.  
 3 MR. EDWARDS: Giuffre [REDACTED]  
 4 Q. I'm going to direct your attention  
 5 to the top right-hand corner, for Mr.  
 6 Epstein, [REDACTED] message [REDACTED] a phone  
 7 number and called.  
 8 Do you know who [REDACTED] is?  
 9 A. I don't.  
 10 Q. Do you know that [REDACTED] was 15 at  
 11 the time she left this message?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I don't know who [REDACTED] is.  
 15 Q. And then I'm going to direct your  
 16 attention to the bottom left which is a  
 17 message JE message of Jean Luc and the  
 18 message says, He just did a good one, 18  
 19 years, she spoke to me and said I love  
 20 Jeffrey.  
 21 Was Jean Luc referring to sex with  
 22 an 18 year old in that message?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. How could I know what Jean Luc is

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1 G Maxwell - Confidential  
 2 referring to.  
 3 Q. Do you know if Jean Luc had sex  
 4 with an 18 year old that he referenced to  
 5 Jeffrey Epstein?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. How could I possibly know.  
 9 Q. Did Jeffrey Epstein or Jean Luc  
 10 ever tell you that Jean Luc had sex with an  
 11 18 year old?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I have no idea what you are talking  
 15 about.  
 16 Q. Did they ever tell you that?  
 17 A. I have no recollection of ever  
 18 hearing such a ridiculous thing.  
 19 Q. I will turn to the next page which  
 20 is SAO 2841?  
 21 MS. MENNINGER: Do you have the  
 22 Bates number?  
 23 Q. The bottom right-hand corner, Mr.  
 24 Epstein, the date [REDACTED] Ms. Maxwell, it  
 25 says, [REDACTED] it says, quote, [REDACTED] is

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1 G Maxwell - Confidential  
 2 available on Tuesday, no one for tomorrow.  
 3 Is this a message you took?  
 4 A. It's not my handwriting and I don't  
 5 know who R is.  
 6 Q. So when it says Ms. Maxwell in the  
 7 line there, is that you calling for Mr.  
 8 Epstein?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I didn't write it, I don't know  
 12 when this message was taken. I don't even  
 13 know what it's referring to and I don't know  
 14 what my name is doing on that message pad.  
 15 Q. I know you said you only took them  
 16 a few times. Do you have a recollection of  
 17 taking messages of females who would call the  
 18 house to indicate whether or not they were  
 19 coming over?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Give me a date range.  
 23 Q. On 7/9/04.  
 24 A. How would I know if I'm in Palm  
 25 Beach, most likely not.

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1 G Maxwell - Confidential  
 2 Q. I'm asking if you have a  
 3 recollection of taking messages for girls who  
 4 would call the house --  
 5 A. Girls.  
 6 Q. Females, who would call the  
 7 house --  
 8 A. Over the age of 18.  
 9 Q. [REDACTED] is 15.  
 10 A. I don't know who [REDACTED] is, so I  
 11 can't testify anything to [REDACTED]  
 12 Q. Your name is on the message.  
 13 A. I didn't put it there and I don't  
 14 know what it's doing there.  
 15 Q. So your testimony is you didn't  
 16 take this message?  
 17 A. I obviously didn't take the  
 18 message, it's signed by somebody R, it's not  
 19 my handwriting. We don't know if I'm in Palm  
 20 Beach.  
 21 Q. Did you arrange for [REDACTED] to have  
 22 his friend [REDACTED] come over on Tuesday of  
 23 this week?  
 24 A. I don't know who [REDACTED] is so it  
 25 would be hard for me to arrange anything with

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1 G Maxwell - Confidential  
 2 someone I don't know.  
 3 Q. Why is your name reflected on this  
 4 message pad?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I have no idea. You would have to  
 8 ask whoever took the message.  
 9 Q. Did you, in the course of your  
 10 work, regularly take messages for Jeffrey  
 11 Epstein?  
 12 A. I already testified I hardly ever  
 13 did.  
 14 Q. Would you, in the course of your  
 15 work, regularly set up appointments for  
 16 females to come over and give massages for  
 17 Jeffrey Epstein?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. Can you specify, females, you mean  
 21 adults over the age of 18.  
 22 Q. Did you regularly set up for  
 23 Jeffery adults over the age of 18 to come for  
 24 massages?  
 25 A. I didn't regularly do that, no.

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1 G Maxwell - Confidential  
 2 Q. Would you take messages with  
 3 respect to females over the age of 18 to come  
 4 over for a massage?  
 5 A. I already testified I hardly ever  
 6 did take messages.  
 7 Q. But would you?  
 8 A. I already testified, I hardly  
 9 ever --  
 10 Q. I know hardly ever, but did you?  
 11 A. Over the course of time it is  
 12 possible I may have taken a couple, I have no  
 13 recollection. I hardly ever did and I did so  
 14 irregularly that it would hard for me to  
 15 pinpoint.  
 16 Q. Did you ever take a message for a  
 17 female under the age of 18 to come over for a  
 18 massage or for any other reason to be with  
 19 Jeffrey Epstein?  
 20 MR. PAGLIUCA: Object to the form  
 21 and foundation.  
 22 A. I hardly ever took a message. I  
 23 have absolutely no way of knowing, maybe one  
 24 of my friends' daughters called to say they  
 25 were coming to visit me. I have never taken

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1 G Maxwell - Confidential  
 2 messages, I don't know about how I would  
 3 possibly know if somebody I spoke to, one or  
 4 two times I took a message is, how old they  
 5 would be but I have never taken a message  
 6 where I was aware of anything being under the  
 7 age of 18 and I probably took it so  
 8 infrequently, it would be impossible.  
 9 Q. Can you turn to [REDACTED] it  
 10 should be the next page.  
 11 A. Uh-huh.  
 12 Q. Do you see at the top, it says, for  
 13 Mr. J. 11/8/04 and then the name is  
 14 redacted. It says, I have a female for him.  
 15 Why would a minor be calling  
 16 Jeffrey to say they have a female for him?  
 17 Do you know?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. First of all, I don't know that's a  
 21 minor, I don't know who took the message.  
 22 Q. I will represent to you these are  
 23 police reports and minor's names have to be  
 24 redacted for privacy purposes?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 Q. Do you know why a minor child would  
 4 be calling Jeffrey and leaving a message to  
 5 say, quote, I have a female for him?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I can't testify anything about this  
 9 message, I don't know anything about it.  
 10 Q. I'm going to direct your attention  
 11 to the next page [REDACTED] If you look at  
 12 the bottom left, you are going to see a  
 13 message for Jeffrey, from [REDACTED] it  
 14 says she doesn't have a number and left a  
 15 message that she called.  
 16 Do you know who [REDACTED] is?  
 17 A. I do not.  
 18 Q. Do you know that [REDACTED] was  
 19 13 at the time she placed this call to  
 20 Jeffrey?  
 21 A. I don't know who [REDACTED] is.  
 22 Q. Would Jeffrey regularly have 13  
 23 year olds call and leave messages?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. How would I possibly, these were  
 3 messages taken when I was not at the house  
 4 and I have no idea who they are nor how old  
 5 they are nor anything.  
 6 Q. How do you know you weren't at the  
 7 house on this day?  
 8 A. I was hardly at the house in 2005.  
 9 Q. So you could have been there, you  
 10 just don't know?  
 11 A. In the five days I might have been  
 12 there in 2005, I suppose it's possible but  
 13 it's unlikely.  
 14 MR. PAGLIUCA: Do you know why this  
 15 isn't redacted if you are representing  
 16 all the names of people who are underage  
 17 have been redacted from these records.  
 18 MS. McCAWLEY: I think it was -- my  
 19 assumption is it was a miss by the  
 20 police department.  
 21 Q. I will direct your attention to [REDACTED]  
 22 [REDACTED] so you will skip a page and go back,  
 23 it's the final page in the message pads and  
 24 you will see on the top left for Jeffrey, on  
 25 6/1/2005 from Jean Luc Brunel with a phone

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1 G Maxwell - Confidential  
 2 number. It says, quote, He has a teacher for  
 3 you to teach you how to speak Russian. She  
 4 is two times eight years old. Not blond.  
 5 Lessons are free and you can have your first  
 6 today if you call.  
 7 Do you know whether Jean Luc Brunel  
 8 sent a Russian girl that was 16 years old  
 9 over to Jeffrey Epstein's home?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I do not know.  
 13 Q. Did you ever observe a Russian girl  
 14 that was 16 years old come to Jeffrey  
 15 Epstein's home?  
 16 A. I am not aware of any 16 year old  
 17 Russian girl that I can recall in Jeffrey  
 18 Epstein's home.  
 19 Q. Do you know whether Jeffrey Epstein  
 20 had sex with a 16 year old Russian girl?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I do not know.  
 24 THE VIDEOGRAPHER: It's 12:25.  
 25 This will be the end of disk 3, we are

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1 G Maxwell - Confidential  
 2 off the record.  
 3 (Recess.)  
 4 AFTERNOON SESSION  
 5 (Time noted: 1:21 p.m.)  
 6 GHISLAINE MAXWELL,  
 7 resumed and testified as follows:  
 8 EXAMINATION BY (Cont'd.)  
 9 MS. McCAWLEY:  
 10 THE VIDEOGRAPHER: It's now 1:21,  
 11 we're starting disk No. 4. We are back  
 12 on the record.  
 13 Q. Ms. Maxwell, before the break, we  
 14 were talking about and I think it's one of  
 15 the exhibits that's marked in front of you,  
 16 I'm not sure of the number, but the police  
 17 report that I showed you earlier today.  
 18 Now that you have knowledge of the  
 19 police report and the criminal investigation  
 20 with respect to Jeffrey Epstein, do you  
 21 believe that Jeffrey Epstein abused any minor  
 22 children?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Can you repeat the question please

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1 G Maxwell - Confidential  
 2 and break it down so it's more  
 3 understandable.  
 4 Q. Now that you have the police report  
 5 that I showed you this morning that you had  
 6 an opportunity to look at.  
 7 A. You gave it to me, I did not look  
 8 at it.  
 9 Q. The questions that I asked you  
 10 about the police report -- you are aware  
 11 there is a police report?  
 12 A. I am aware there is a police  
 13 report.  
 14 Q. You are aware there was a criminal  
 15 investigation of Jeffrey Epstein?  
 16 A. I am aware that there was that.  
 17 Q. Now that you are aware of those two  
 18 things and having talked to Jeffrey Epstein,  
 19 do you believe Jeffrey Epstein sexually  
 20 abused minors?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. Can you reask the second part of  
 24 that question please.  
 25 Q. Sure. The two documents we were

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1 G Maxwell - Confidential  
 2 talking about, the document and the  
 3 investigation, you said you are aware of and  
 4 after having talked to Jeffrey Epstein, do  
 5 you believe Jeffrey Epstein sexually abused  
 6 minors?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. What do you mean I talked to  
 10 Jeffrey, you need to break the question down  
 11 further.  
 12 Q. So you have the police report.  
 13 A. I do.  
 14 Q. And you are aware of the criminal  
 15 investigation?  
 16 A. I am.  
 17 Q. Let's take those two things. After  
 18 knowing those two things, do you believe that  
 19 Jeffrey Epstein abused minor children?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Can you explain what you mean by  
 23 the question actually.  
 24 Q. I think the question speaks for  
 25 itself. I will try again. I will say it one

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1 G Maxwell - Confidential  
 2 more time because I want you to be able to  
 3 understand it.  
 4 Knowing that you have the police  
 5 report here and knowing about the criminal  
 6 investigation, do you believe that Jeffrey  
 7 Epstein sexually abused minors?  
 8 MR. PAGLIUCA: Same objection.  
 9 A. I know what you put in front of me  
 10 and I know what I read.  
 11 Q. I'm asking what you believe, do you  
 12 believe Jeffrey Epstein sexually abused  
 13 minors?  
 14 A. I can only tell you what I read and  
 15 what you showed me.  
 16 Q. I'm asking what you believe, from  
 17 your own belief, do you believe that Jeffrey  
 18 Epstein abused minors?  
 19 A. I can only go from what I know  
 20 personally and what I know personally about  
 21 what Virginia's lies talked about. She is  
 22 the only person I know that actually claimed  
 23 that. And I can say with certitude that  
 24 everything Virginia said was a lie.  
 25 Q. You are aware Jeffrey Epstein was

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1 G Maxwell - Confidential  
 2 sentenced for sexual abuse, are you aware of  
 3 that?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 Q. Are you aware that Jeffrey Epstein  
 7 served time for sexual abuse of a minor?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I don't believe that's what he was  
 11 sentenced for, actually.  
 12 Q. So you don't know that Jeffrey  
 13 Epstein served time for sexually abusing a  
 14 minor?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I don't believe that's what he was  
 18 sentenced for.  
 19 Q. Do you know that Jeffrey Epstein  
 20 was convicted for procuring a minor for  
 21 prostitution?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. I don't know exactly what he was  
 25 convicted of. I don't know that he was

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1 G Maxwell - Confidential  
 2 convicted. I know he spent time in jail.  
 3 Q. Do you know that he spent time in  
 4 jail related to an issue with a minor child?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I did not know that.  
 8 Q. What did you think he was spending  
 9 time in jail for?  
 10 A. I only know he went to jail for --  
 11 it was alleged that he hired -- had an  
 12 underage prostitute.  
 13 Q. So knowing that, do you believe  
 14 that Jeffrey Epstein sexually abused minors?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I can only tell you what he went to  
 18 jail for.  
 19 Q. I'm asking what you believe. I'm  
 20 not asking what he went to jail for. I'm  
 21 asking for your belief.  
 22 A. I cannot testify to what I believe.  
 23 I can only say what I have seen in the  
 24 reports and I know he went to jail.  
 25 Q. You can testify to what you

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1 G Maxwell - Confidential  
 2 believe. Do you believe --  
 3 A. I can only testify --  
 4 Q. Let me finish the question so the  
 5 record is clear.  
 6 Do you believe Jeffrey Epstein  
 7 sexually abused minors?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 Q. You can answer.  
 11 A. I can only testify to what I know.  
 12 I know that Virginia is a liar and I know  
 13 what she testified is a lie. So I can only  
 14 testify to what I know to be a falsehood and  
 15 half those falsehoods are enormous and so I  
 16 can only categorically deny everything she  
 17 has said and that is the only thing I can  
 18 talk about because I have no knowledge of  
 19 anything else.  
 20 Q. I'm not asking about Virginia. I'm  
 21 asking whether you believe that Jeffrey  
 22 Epstein sexually abused minors?  
 23 A. Again, I repeat, I can only go on  
 24 what I know and what I know is a falsehood  
 25 based on what Virginia said.

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1 G Maxwell - Confidential  
 2 Q. Do you believe Jeffrey Epstein  
 3 sexually abused minors?  
 4 A. Again, I repeat, Virginia is a liar  
 5 and based on Virginia's stories, that is  
 6 what -- she lied and I can only then talk  
 7 about what you've showed me in the police  
 8 reports and I know he went to jail.  
 9 Q. Do you believe that Jeffrey Epstein  
 10 sexually abused minors? I'm asking about  
 11 your belief.  
 12 A. Again, I just repeat, I can only  
 13 go -- my belief is Virginia is a liar.  
 14 Q. What is that belief?  
 15 A. She is an absolute liar and  
 16 everything she said is a lie and therefore,  
 17 everything that stems from that is a lie.  
 18 Q. So do you believe that Jeffrey  
 19 Epstein sexually abused minors?  
 20 A. Again -- can we move on from here?  
 21 Q. No. You are going to answer the  
 22 question.  
 23 A. I have already.  
 24 Q. No, you haven't.  
 25 A. I have.

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1 G Maxwell - Confidential  
 2 Q. Do you believe Jeffrey Epstein  
 3 sexually abused minors?  
 4 A. Again, I repeat, the only person I  
 5 know who has talked about these things that I  
 6 have personal -- was personally present, was  
 7 Virginia and I can only talk to Virginia and  
 8 she is a liar.  
 9 Q. Setting aside Virginia. Take her  
 10 out of the picture. It's my question.  
 11 A. We are here today because of  
 12 Virginia and her lies because this is a  
 13 defamation suit.  
 14 Q. Setting aside Virginia, do you  
 15 believe Jeffrey Epstein sexually abused  
 16 minors?  
 17 A. I cannot set aside Virginia because  
 18 that's why we are here and this is the only  
 19 reason I am sitting here in this room and I  
 20 will not set her aside and I cannot comment  
 21 about anything else except her because she is  
 22 the only person I actually know about.  
 23 Q. Are you refusing to answer that  
 24 question?  
 25 A. I am not refusing the question. I

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1 G Maxwell - Confidential  
 2 can only testify about Virginia who is an  
 3 absolute total liar and you all know she is.  
 4 She lied about her age, you know she lied  
 5 about absolutely everything. So I can only  
 6 go on what I know as a liar and she is a  
 7 liar, an exaggerator, a fantasist and  
 8 absolutely true terrible person.  
 9 Q. I want you to listen very  
 10 carefully. I am asking you to set aside  
 11 Virginia.  
 12 A. I can't set aside Virginia.  
 13 Q. I am asking you to do that for  
 14 purposes of this question.  
 15 MR. PAGLIUCA: She doesn't have to.  
 16 MS. McCAWLEY: She can refuse to  
 17 answer the question.  
 18 A. I'm not refusing to answer the  
 19 question.  
 20 Q. You are refusing.  
 21 My question has nothing to do with  
 22 Virginia. Let me make the record here. My  
 23 question has nothing to do with Virginia. I  
 24 want it to be clear for the court. My  
 25 question has nothing to do with Virginia.



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1 G Maxwell - Confidential  
 2 What I'm asking you is whether you  
 3 believe Jeffrey Epstein abused minors?  
 4 MR. PAGLIUCA: I object to the form  
 5 and you made your record, she answered  
 6 the question. A fair reading of her  
 7 answer is she doesn't have a belief  
 8 because she doesn't have any personal  
 9 knowledge.  
 10 MS. McCAWLEY: Now you are  
 11 testifying for the witness. Let her  
 12 answer the question.  
 13 MR. PAGLIUCA: It's a fair answer  
 14 to the question.  
 15 A. Again, I testified my only personal  
 16 knowledge concerns Virginia and everything  
 17 Virginia has said is an absolute lie, which  
 18 is why we are here in this room. If you are  
 19 asking me to testify about things I have no  
 20 knowledge of other than the police report  
 21 that you showed me, I am not in a position to  
 22 make a statement based on that because you  
 23 are asking me to speculate and I cannot  
 24 speculate.  
 25 Q. I'm asking you about your belief.

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1 G Maxwell - Confidential  
 2 I'm not asking you to speculate at all. I'm  
 3 asking what you believe.  
 4 A. You are asking me to speculate and  
 5 I won't speculate.  
 6 Q. I'm not asking you to speculate.  
 7 I'm asking what you believe.  
 8 MR. PAGLIUCA: She answered the  
 9 question and we can move on.  
 10 MS. McCAWLEY: She hasn't answered  
 11 the question.  
 12 MR. PAGLIUCA: We are not going to  
 13 engage in this debate. She answered the  
 14 question. If you want to mark it and  
 15 move to compel an answer to the  
 16 question, have at it. Okay.  
 17 Q. Ms. Maxwell, is it your belief that  
 18 Jeffrey Epstein interacted sexually with  
 19 minors?  
 20 A. Again, you are asking me the same  
 21 type of question exactly but with different  
 22 language. Again, my only knowledge of  
 23 somebody who claims these things that I have  
 24 personal knowledge of is Virginia. Virginia  
 25 is an absolute liar and everything she has

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1 G Maxwell - Confidential  
 2 said is a lie. Therefore, based on those  
 3 lies I cannot speculate on what anybody else  
 4 did or didn't do because if Virginia is the  
 5 example of what that story is and everything  
 6 she said is false, so everything that leads  
 7 from that is false.  
 8 Q. So the 30 other minor children in  
 9 the police report are also telling lies about  
 10 being sexually abused during massages with  
 11 Mr. Epstein?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation. Counsel, can you  
 14 show me in these police reports who the  
 15 30 minors are?  
 16 MS. McCAWLEY: I'm asking my  
 17 question.  
 18 MR. PAGLIUCA: You are making a  
 19 representation about numbers, you are  
 20 making a representation on the record  
 21 about what people said or didn't say.  
 22 We have no knowledge about that. These  
 23 are all redacted records so these are  
 24 bad questions. They don't lead to any  
 25 admissible evidence. It is only being

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1 G Maxwell - Confidential  
 2 propounded to the witness to harass her.  
 3 So we are done with these questions.  
 4 MS. McCAWLEY: Are you done?  
 5 MR. PAGLIUCA: Yes.  
 6 Q. My question is, are you aware that  
 7 Jeffrey Epstein was convicted of having  
 8 relations with a minor child?  
 9 MR. PAGLIUCA: She answered that  
 10 question already.  
 11 MS. McCAWLEY: I'm getting to my  
 12 next question.  
 13 MR. PAGLIUCA: Ask your next  
 14 question. Don't keep asking the same  
 15 question.  
 16 MS. McCAWLEY: You are now  
 17 shouting, I want the record to reflect  
 18 that you are interrupting the  
 19 deposition. I ask you to calm down,  
 20 take a deep breath and please let me ask  
 21 my questions.  
 22 MR. PAGLIUCA: Your behavior is  
 23 inappropriate.  
 24 Q. I will ask you again.  
 25 Do you believe that Jeffrey Epstein

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1 G Maxwell - Confidential  
 2 interacted sexually with minors?  
 3 A. Again, I go back to this, my only  
 4 actual knowledge is with Virginia and  
 5 Virginia is a liar, so I can only talk to  
 6 what Virginia's story and as I said before  
 7 and there are so many examples, I mean  
 8 thousands of examples of her lies, that that  
 9 is the only thing I can talk to.  
 10 Q. Based on that you do not believe  
 11 that Jeffrey Epstein sexually abused minors?  
 12 A. Again, as I said, I'm only talking  
 13 to what I know, I can only talk to Virginia.  
 14 Q. So is it your belief that Jeffrey  
 15 Epstein did not sexually abuse minors?  
 16 A. Again, I can only talk to what I  
 17 know and I know that Virginia is a liar and  
 18 that what she said is a lie. So I can only  
 19 testify to what she accused and you guys put  
 20 in the press for salacious purposes and  
 21 whatever terrible, inappropriate, unethical  
 22 and terrible reasons you chose to do that  
 23 about me and I can testify those are all  
 24 lies.  
 25 Q. Do you know whether Jeffrey Epstein

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 2 sexually abused any minor children?  
 3 A. Again, I only know 1000 percent  
 4 that Virginia is a liar. I can only talk to  
 5 Virginia, her lies and your inappropriate,  
 6 unethical, really unattractive, terrible use  
 7 of her and the way that you have abused the  
 8 system, used the press for purposes that are  
 9 unethical, inappropriate and appalling.  
 10 Q. Do you believe that Jeffrey Epstein  
 11 used massages to lure minors to have sex with  
 12 him?  
 13 A. Again, that is Virginia's  
 14 testimony, which is a lie.  
 15 Q. But do you believe that?  
 16 A. Again, I refer back to Virginia.  
 17 Q. I'm asking whether you believe it  
 18 or not?  
 19 A. I can only go with what I know and  
 20 I know Virginia is a liar and therefore  
 21 that's a lie.  
 22 Q. So you don't believe that?  
 23 A. I said, I only know that Virginia  
 24 is lying.  
 25 Q. Are you aware that Jeffrey Epstein

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 2 is a registered sex offender?  
 3 A. I am.  
 4 Q. Are you aware that Jeffrey Epstein  
 5 paid considerable amounts of money to settle  
 6 lawsuits with the minor children that he had  
 7 sexual contact with?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I have no knowledge of those  
 11 issues.  
 12 Q. Why did you continue to maintain  
 13 contact with Jeffrey Epstein after he pled  
 14 guilty?  
 15 A. I'm a very loyal person and Jeffrey  
 16 was very good to me when my father passed  
 17 away and I believe that you need to be a good  
 18 friend in people's hour of need and I felt  
 19 that it was a very thoughtful, nice thing for  
 20 me to do to help in very limited fashion  
 21 which was helping if he had any issue with  
 22 his homes, in terms of the staffing issues.  
 23 It was very, very minor but I felt it was  
 24 thoughtful in somebody's hour of need.  
 25 Q. Did he continue to pay you during

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 2 that time period?  
 3 A. I was paid a little.  
 4 Q. You were paid?  
 5 A. Yes.  
 6 Q. When you say a little, what you did  
 7 mean by that?  
 8 A. I don't recall exactly the amount.  
 9 Q. So in 2009 when you left him, what  
 10 were you being paid?  
 11 A. I just told you, I don't recall.  
 12 Q. Were you being paid \$100,000?  
 13 A. I just don't you I don't recall.  
 14 Q. Were you paid over a million  
 15 dollars?  
 16 A. I think I would remember over a  
 17 million dollars.  
 18 Q. So it was under a million dollars?  
 19 A. It was under a million dollars.  
 20 Q. Was it over \$500,000?  
 21 A. I just told you, it was under 500,  
 22 it was an amount of money less than \$500,000,  
 23 less than a million dollars and I did it out  
 24 of thoughtfulness and consideration for  
 25 somebody who was in trouble.

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 2 Q. Did you have an attorney to consult  
 3 with during the criminal investigation of  
 4 Jeffrey Epstein?  
 5 A. I don't believe I did.  
 6 Q. When did you learn that a search  
 7 warrant was executed for the Palm Beach  
 8 house?  
 9 A. I don't recall exactly.  
 10 Q. Were you present at the house in  
 11 advance of the search warrant being executed?  
 12 MR. PAGLIUCA: Object to the form  
 13 of the question.  
 14 A. I don't remember when the search  
 15 warrant was executed and I don't remember the  
 16 year that the search warrant was executed and  
 17 whenever that was, I already testified, I was  
 18 very, very infrequently at the house. So  
 19 highly unlikely but I was there a couple of  
 20 days, I just don't know which days it was in  
 21 relation to the police situation.  
 22 Q. Did you have a computer at the Palm  
 23 Beach home that was a computer that you would  
 24 use?  
 25 A. No.

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 2 Q. Was there a computer available for  
 3 use in the Palm Beach house?  
 4 A. Can you be more specific.  
 5 Q. Was there anywhere in the Palm  
 6 Beach house where there was a computer where  
 7 you said you worked for him and there were  
 8 other staff in the house, was there ever a  
 9 computer in the Palm Beach mansion that was  
 10 accessible by you or other staff?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I stopped being regularly at the  
 14 house sometime in 2003 so from 2003 to when  
 15 the police search was executed, I have no  
 16 memory of what there was or what there was  
 17 not. I can only testify for what was there  
 18 when I was present largely.  
 19 Q. So in 2003 when you were still  
 20 there, was there a computer that was  
 21 accessible to you or other staff at the  
 22 house?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. There was a desktop computer that

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 2 people could use -- just like you would use  
 3 if you needed to go online to get something,  
 4 that people could use.  
 5 Q. Was that on a desk that you would  
 6 use in your work capacity when you were at  
 7 the house?  
 8 A. It was a desk, it was a room I was,  
 9 I didn't really use that computer.  
 10 Q. Were there images of naked girls  
 11 whether they be under the age of 18 or over  
 12 the age of 18 on that computer?  
 13 A. I have no recollection of any naked  
 14 people on that computer when I was there in  
 15 2003, we are talking.  
 16 Q. What about from say '99 to 2003?  
 17 A. No, I can't recollect any naked  
 18 pictures.  
 19 Q. Why were the computers removed from  
 20 the house before the search warrant was  
 21 executed?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. I have no knowledge of anything  
 25 like that.

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 2 Q. Do you know where the computers are  
 3 now?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I don't know what computers you are  
 7 talking of and I have no idea what you are  
 8 referencing.  
 9 Q. In 2003 you said there was a  
 10 computer in a room on a desk?  
 11 A. Right.  
 12 Q. Do you know where that computer is  
 13 now?  
 14 A. I do not.  
 15 Q. Did you take pictures of nude  
 16 females in any of Epstein's homes or in and  
 17 around the homes, out by the pool or anywhere  
 18 like, in the Palm Beach home, the New York  
 19 home, USVI home or the New Mexico home?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Can you repeat the question.  
 23 Q. Did you take pictures of nude woman  
 24 over 18 or under 18, females, in any of  
 25 Jeffrey Epstein's homes, inside or outside in

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 2 or around the home?  
 3 A. I think we need to distinguish  
 4 between anyone under the age of 18 and over  
 5 the age of 18.  
 6 Q. We will start with, did you take  
 7 pictures of nude females in or around any of  
 8 Jeffrey's homes of women or females that were  
 9 under the age of 18?  
 10 A. No.  
 11 Q. Did you take pictures of nude  
 12 females --  
 13 A. Nude you mean with no clothing on.  
 14 Q. Or half nude, with no top on, any  
 15 sort of nakedness to an individual.  
 16 In any of Jeffrey's homes, either  
 17 Palm Beach, New Mexico, USVI or New York  
 18 either outside by the pool, anywhere in or  
 19 around those homes of females over the age of  
 20 18?  
 21 A. So it is possible that I took  
 22 pictures of people that were somehow semi or  
 23 had some clothing on or no clothes on but at  
 24 no time were any of these pictures remotely  
 25 inappropriate. They were, you could see them

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 2 in a mainstream magazine today, there would  
 3 be no inappropriateness, they would be  
 4 covered, concealed, you wouldn't see anything  
 5 at all.  
 6 The types of -- first, I took very  
 7 few and they were always by request, this was  
 8 a picture you could put on your -- gift to  
 9 your parent or to your grandparents to put on  
 10 their mantel piece . It would be a very  
 11 benign sort of attractive picture where you  
 12 wouldn't see anything.  
 13 Q. Who would request those pictures?  
 14 A. From time to time, people, men and  
 15 women would ask to have nice photographs of  
 16 them taken.  
 17 Q. And did Jeffrey Epstein request  
 18 those pictures?  
 19 A. I don't ever recall him asking me  
 20 to take pictures.  
 21 Q. Did you give him pictures of naked  
 22 females as a present?  
 23 A. I don't recall ever giving a  
 24 present of -- I don't know why a photograph  
 25 would constitute a gift.

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 2 Q. Not as a gift.  
 3 Do you recall ever giving Jeffrey  
 4 Epstein pictures that you've taken of these  
 5 individuals in a naked state?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. First of all, we've already  
 9 established that they are not naked state  
 10 photographs.  
 11 Q. A piece of them being naked as you  
 12 described.  
 13 A. I said they would be attractive as  
 14 you would see in mainstream magazines and  
 15 those pictures could be a picture of a hand  
 16 or a foot, they didn't necessarily  
 17 constitute -- I know where you are headed  
 18 with this and it's nowhere appropriate and  
 19 it's really unattractive.  
 20 Q. I'm not headed anywhere. I'm just  
 21 asking the questions. Did you give Jeffrey  
 22 Epstein any of these pictures that you took  
 23 of females in the state that you described?  
 24 A. I can't recall ever giving him  
 25 pictures but it is possible that I took

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 2 pictures of people that would end up -- or a  
 3 friend of his that he would have -- not naked  
 4 or not inappropriate in any way, that he  
 5 might have somewhere in his house.  
 6 Q. Name for me all the individuals who  
 7 you took these pictures of?  
 8 A. It's entirely impossible for me to  
 9 name people. First of all, it was just -- it  
 10 would not be possible, I took thousands of  
 11 photos, not of people, I mostly take pictures  
 12 of landscapes and things. I have no  
 13 recollection specifically of people that I  
 14 took pictures of.  
 15 Q. So you can't remember, is it your  
 16 testimony you can't remember one person that  
 17 you took a picture of in either a naked or  
 18 semi naked state?  
 19 A. I seriously cannot recall. I just  
 20 don't recall.  
 21 Q. Did you take a picture of Virginia  
 22 Roberts either alone or with another  
 23 individual in a naked state?  
 24 A. I have never taken, I believe, any  
 25 pictures of two people in any type of

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 2 situation, naked as you describe.  
 3 Q. Did you take a picture of Virginia  
 4 Roberts on her own without another individual  
 5 in it in a naked state?  
 6 A. I don't recall ever taking a  
 7 picture of Virginia -- naked, we are not  
 8 referring to someone with no clothing on at  
 9 all, we are referring to someone that could  
 10 be semi clad or could have a towel or we are  
 11 not referring to anything inappropriate.  
 12 Q. Was this a hobby of yours to take  
 13 pictures of the type that you are describing?  
 14 MR. PAGLIUCA: Object to the form.  
 15 A. I just testified, I didn't take  
 16 pictures of many people. My preference is  
 17 pictures for landscapes and for architectural  
 18 pieces.  
 19 Q. Where are those pictures today?  
 20 A. I have no idea.  
 21 Q. Do you have them in your home?  
 22 A. I do not.  
 23 Q. Do you have them on your computer?  
 24 A. I do not.  
 25 Q. What has Jeffrey Epstein told you

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 2 about the allegations related to the criminal  
 3 investigation that he was involved in?  
 4 A. I really can't say, not because I  
 5 don't want to say but I just think of what he  
 6 has said to me over the course of this time.  
 7 Q. Did he explain it to you and  
 8 explain what the charges were against him?  
 9 A. I never had a detailed conversation  
 10 with him, as I recall.  
 11 Q. Not detailed, just did he explain  
 12 anything that was happening to him?  
 13 A. I haven't spoken to him for so  
 14 long. I can't possibly testify to what  
 15 conversations I had with him over the course  
 16 of time.  
 17 Q. Did he talk to you about any of the  
 18 girls that were making allegations against  
 19 him other than Virginia?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. You are talking about the police  
 23 records again, all of that?  
 24 Q. Yes.  
 25 A. I have never had a conversation

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 2 about those things.  
 3 Q. What has Jeffrey Epstein told you  
 4 about Virginia Roberts?  
 5 A. That she is a liar.  
 6 Q. What does he base that on?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. You would have to check with him.  
 10 I can tell you why I think she is a liar, I'm  
 11 happy to do that.  
 12 Q. Did he tell you he did not have  
 13 sexual relations with Virginia Roberts?  
 14 A. I can only testify what I know.  
 15 Q. I'm asking, has he told you that he  
 16 did not have sexual relations with Virginia  
 17 Roberts?  
 18 A. I can only tell you what I know  
 19 about Virginia Roberts, I cannot tell you  
 20 what he knows about Virginia Roberts.  
 21 Q. I'm asking, did he tell you that he  
 22 did not have sexual relations with Virginia  
 23 Roberts?  
 24 A. All he told me is she is a liar.  
 25 Q. That's all he said about Virginia

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 2 Roberts?  
 3 A. We went through all the lies that  
 4 you have sold to the papers and sold in  
 5 general and we have analyzed her lies and  
 6 your lies and your inappropriate behavior in  
 7 detail.  
 8 Q. Did he ever say that he did not  
 9 have sexual relations with Virginia Roberts?  
 10 A. I just testified that we went  
 11 through all of her lies.  
 12 Q. I understand what you said. I'm  
 13 asking you a question.  
 14 Did he ever tell you that he never  
 15 had sex with Virginia Roberts?  
 16 A. I don't recall whether he ever -- I  
 17 don't know I ever had that question. We  
 18 focused on the lies she did say she had with  
 19 him as relates to me. I don't remember  
 20 asking him about his problems with her. I'm  
 21 interested in what she says about myself.  
 22 Q. Did you also talk about what things  
 23 that Virginia Roberts was saying that were  
 24 true?  
 25 A. There isn't anything that she said

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 2 that was true.  
 3 Q. Nothing she said that you are aware  
 4 of is true?  
 5 A. I think she is correct when she  
 6 talks about what her name is.  
 7 Q. Anything else?  
 8 A. I'm sure there must be one or two  
 9 other details but they are so far and few  
 10 between, I would have to look in detail at  
 11 all of her allegations to pinpoint what  
 12 possibly could be true.  
 13 Q. Did you ever ask Jeffrey if he had  
 14 sex with minors?  
 15 A. I have never been asked that  
 16 question.  
 17 Q. You never asked him that question.  
 18 What analysis did Jeffrey do to  
 19 determine that the statements Virginia  
 20 Roberts were making were lies?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. Ask me again, please.  
 24 Q. What analysis did Jeffrey do to  
 25 determine that the statements that Virginia

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 2 Roberts were making were lies?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation. And to the extent  
 5 that any of this answer calls for any  
 6 privileged communication, I'm  
 7 instructing, with myself or another  
 8 lawyer representing you or in any common  
 9 interest agreement, I'm instructing you  
 10 not to answer.  
 11 MS. McCAWLEY: The court ruled she  
 12 is entitled and you had to produce  
 13 documents about communications with  
 14 Jeffrey, that's what I'm asking about.  
 15 I'm not asking about communications with  
 16 lawyers.  
 17 Q. I'm asking what analysis did  
 18 Jeffrey do to determine that the statements  
 19 that Virginia Roberts was making were lies,  
 20 if you know?  
 21 MR. PAGLIUCA: My objection is to  
 22 the extent she learned any of that  
 23 information as a result of either a  
 24 privileged communication from a lawyer,  
 25 one of her lawyers or a privileged

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 2 communications subject to a joint  
 3 defense agreement or common interest  
 4 agreement, I'm telling her not to  
 5 answer. To the extent she has  
 6 information outside of those things, she  
 7 is permitted to answer.  
 8 Q. Do you understand?  
 9 So if it was a conversation with a  
 10 lawyer which I'm not asking about, I don't  
 11 want you to tell me about your conversations  
 12 with lawyers.  
 13 I want you to tell me whether  
 14 Jeffrey Epstein ever told you what he  
 15 analyzed in order to determine which of -- of  
 16 what Virginia were saying were lies?  
 17 A. I do not know what he did, no.  
 18 So you agree she is lying, Singrid.  
 19 Q. I do not agree with that and I'm  
 20 asking the questions.  
 21 A. You just said her lies.  
 22 Q. I'm repeating a statement you made.  
 23 Q. Are you saying it's an obvious lie  
 24 that Jeffrey Epstein engaged in sexual  
 25 conduct with Virginia while Virginia was

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 2 underage?  
 3 A. I can only testify to what I saw  
 4 and what I was present for, so if you are  
 5 asking me what I saw then I am happy to  
 6 testify. I cannot testify to what somebody  
 7 else did or didn't do.  
 8 Q. Did you issue a statement to your  
 9 press agent, Ross Gow in 2015, stating that  
 10 Virginia Roberts' claims were, quote, obvious  
 11 lies?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 Q. You can answer.  
 15 A. You need to reask me the question.  
 16 Q. Sure.  
 17 Did you issue a press statement  
 18 through your press agent, Ross Gow, in  
 19 January of 2015, stating that Virginia  
 20 Roberts' claims were, quote, obvious lies?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. Can you ask it a different way,  
 24 please?  
 25 Q. I will ask it again and you can

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 2 listen carefully.  
 3 Did you issue a press statement  
 4 through your press agent, Ross Gow, in  
 5 January of 2015, where you stated that  
 6 Virginia Roberts' claims were, quote, obvious  
 7 lies?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. So my lawyer, Philip Barden  
 11 instructed Ross Gow to issue a statement.  
 12 Q. Today, did you say that Virginia  
 13 lied about, quote, absolutely everything?  
 14 A. I said that there are some things  
 15 she may not have lied about.  
 16 Q. So are you saying it's an obvious  
 17 lie that Jeffrey Epstein engaged in sexual  
 18 contact with Virginia while Virginia was  
 19 underage?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Can you ask the question again,  
 23 please?  
 24 Q. Are you saying it's an obvious lie  
 25 that Jeffrey Epstein engaged in sexual

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 2 conduct with Virginia while Virginia was  
 3 underage?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 Q. You can answer.  
 7 A. Try again, please.  
 8 Q. Are you saying that it's an obvious  
 9 lie that Jeffrey Epstein engaged in sexual  
 10 conduct with Virginia while Virginia was  
 11 underage?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. Again, I'm telling you, first of  
 15 all, it was a statement that was issued by my  
 16 lawyer and -- through my lawyer to Ross Gow.  
 17 Q. I understand that. I'm asking you,  
 18 are you saying that it's an obvious lie that  
 19 Jeffrey Epstein engaged in sexual conduct  
 20 with Virginia while Virginia was underage.  
 21 Is that a lie?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 Q. You can answer.  
 25 A. So I cannot testify to what Ross

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 2 Gow and Philip Barden decided to put -- I can  
 3 testify to what Virginia's obvious lies are  
 4 as regards to me. I cannot make  
 5 representations about all the many lies she  
 6 may or may not have told about Jeffrey.  
 7 Q. So is Virginia lying when she says,  
 8 is it an obvious lie when she says that she  
 9 had sex with Jeffrey Epstein while she was  
 10 underage?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. Again, I'm testifying to what I  
 14 know to be true. I can only testify to all  
 15 the many lies she told about me. I cannot  
 16 testify to what lies she told about somebody  
 17 else. Given she told so many about me, one  
 18 can probably infer she is lying about  
 19 everything.  
 20 Q. So you think she is lying when she  
 21 said she had sex with Jeffrey Epstein when  
 22 she was underage?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Again, I can only talk about what I

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 2 can positively say myself, not what somebody  
 3 else is going to represent.  
 4 Q. When you were saying that she was,  
 5 her claims of having sex with Jeffrey Epstein  
 6 were obvious lies, are you saying she is  
 7 lying about engaging in sexual conduct with  
 8 Jeffrey Epstein when she was underage?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 Q. You can answer.  
 12 A. Again, this was a statement that  
 13 was put out from my lawyer through my press  
 14 person in London. And I can only testify to  
 15 the obvious lies that she says about me. I  
 16 cannot make representations about lies she  
 17 says about someone else, but she lies so many  
 18 times about me, one can probably infer she is  
 19 lying about everything.  
 20 Q. So is she not lying when -- is she  
 21 telling the truth when she says she had sex  
 22 with Jeffrey Epstein when she was underage?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Again, I don't know how else to

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 2 tell you, I can only talk about what I know  
 3 to be true. What I know is her story about  
 4 how she claims that initial situation  
 5 happened is so egregiously false and such a  
 6 giant fat enormous, repulsive, disgusting,  
 7 inappropriate, vile lie, that that I can  
 8 testify to.  
 9 Q. Was she lying when she said she met  
 10 you at Mar-a-Lago?  
 11 A. Again I already testified I don't  
 12 recall meeting her at Mar-a-Lago.  
 13 Q. We showed you a document where you  
 14 said you met her at Mar-a-Lago when she was  
 15 17, is that correct?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. I think I already testified to  
 19 that. What I remembered based on all the  
 20 rubbish she has written and all the many  
 21 articles I have read, maybe in the moment  
 22 when I wrote that, have caused me to have  
 23 that but on reflection I don't recall it as I  
 24 sit here today.  
 25 Q. Are you saying that it was an

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 2 obvious lie that you approached Virginia  
 3 while she was under age at Mar-a-Lago?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. First of all, we can all agree  
 7 here, all of you sitting here that the lies  
 8 that you perpetrated in the press that she  
 9 was 15 and we should all agree now that that  
 10 is fake, a lie that was perpetrated between  
 11 all of you to make the story more exciting,  
 12 can we agree on that?  
 13 Q. That is not my question.  
 14 A. Can we agree she was not the age  
 15 she said and you put that in the press, that  
 16 is obviously, manifestly, absolutely, totally  
 17 a lie.  
 18 MS. McCAWLEY: I am going to put on  
 19 the record, Ms. Maxwell very  
 20 inappropriately and very harshly pounded  
 21 our law firm table in an inappropriate  
 22 manner. I ask she take a deep breath,  
 23 and calm down. I know this is a  
 24 difficult position but physical assault  
 25 or threats is not appropriate, so no

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 2 pounding, no stomping, no, that's not  
 3 appropriate.  
 4 A. Can we be clear, I didn't threaten  
 5 anybody.  
 6 MR. PAGLIUCA: Stop, you made your  
 7 record, there is no dent in the table.  
 8 I don't see any chips. Can we take a  
 9 break now.  
 10 MS. McCAWLEY: I think it's  
 11 appropriate to take a break.  
 12 THE VIDEOGRAPHER: It's 1:56 and we  
 13 are off the record.  
 14 (Recess.)  
 15 THE VIDEOGRAPHER: It's now 2:13,  
 16 we're starting disk No. 5 and we are  
 17 back on the record.  
 18 Q. Ms. Maxwell, how old was Virginia  
 19 Roberts when you met her in Mar-a-Lago?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I know today that she was 17 years  
 23 old.  
 24 Q. Are you saying that it's an obvious  
 25 lie that Virginia traveled on Jeffrey

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 2 Epstein's airplanes?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 Q. You can answer.  
 6 A. Are you referring to my statement  
 7 where that says that?  
 8 Q. I'm referring to the language you  
 9 use in your statement that says, obvious  
 10 lies?  
 11 A. Can you read my entire statement?  
 12 Q. Sure, let me pass it out.  
 13 (Maxwell Exhibit 10, email, marked  
 14 for identification.)  
 15 Q. This is Bates GM 00068 and we will  
 16 mark it as -- what you have in front of you  
 17 is a statement at the top. This was produced  
 18 by your counsel, it is indicated Bates No.  
 19 GM 00068. At the top the date reflects  
 20 January 2, 2015 from, appears to be a Ross  
 21 [REDACTED] subject line, is you and  
 22 then there is a number of individuals you can  
 23 see at the top that are copied on this that  
 24 is sent to and bcc'd on this statement.  
 25 The statement, there are two parts



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 2 of it. There is an opening email that says,  
 3 please find an attached quotable statement on  
 4 behalf of Ms. Maxwell and there is more  
 5 language there and it's from Ross Gow and  
 6 then it says in the body of it, Jane Doe No.  
 7 3 or Jane Doe 3 is Virginia Roberts so not a  
 8 new individual. The allegations made by, and  
 9 it says Victoria but I believe that means  
 10 Virginia Roberts, against Ghislaine Maxwell  
 11 are not true. The original allegations are  
 12 not new and have been fully responded to and  
 13 shown to be untrue. And the next paragraph  
 14 says, Each time the story is retold, it  
 15 changes with new salacious details about  
 16 public figures and world leaders and now it  
 17 is alleged by Ms. Roberts that Al Dershowitz  
 18 is involved in having sexual relations with  
 19 her which he denies. Ms. Roberts claims are  
 20 obvious lies and should be treated as such  
 21 and not publicized as news as they are  
 22 defamatory.  
 23 The last paragraph states,  
 24 Ghislaine Maxwell's original response to the  
 25 lies and defamatory claims remains the same.

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 2 Maxwell strongly denies allegations of the --  
 3 strongly denies allegations of an unsavory  
 4 nature which have appeared in the British  
 5 press and elsewhere and reserves her right to  
 6 seek redress at the repetition of such old  
 7 defamatory claims.  
 8 Are you saying that it's an obvious  
 9 lie that Virginia Roberts traveled on Jeffrey  
 10 Epstein's planes?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I'm saying what's an obvious lie  
 14 and I think we can all agree, you just had  
 15 the case tossed out by Alan Dershowitz. He  
 16 just got removed from the case because you  
 17 put him in a case that he wasn't supposed to  
 18 be in so what was said about him is not true.  
 19 Q. Are you saying that it's an obvious  
 20 lie that Virginia Roberts traveled on Jeffrey  
 21 Epstein's plane?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. You have given me plane records  
 25 that has her name on it but as I already

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1 G Maxwell - Confidential  
 2 testified those aren't federally mandated  
 3 things and I can see her name on it but  
 4 that's what I -- I told you I don't recall  
 5 her on any planes.  
 6 Q. Is is that one of Virginia's  
 7 obvious lies?  
 8 A. There are more obvious ones.  
 9 Q. Is that one of them?  
 10 A. I can't testify to her being on a  
 11 plane or not.  
 12 Q. So is that an obvious lie?  
 13 A. There are more obvious lies, like  
 14 Clinton.  
 15 Q. I understand there are more obvious  
 16 ones. I'm asking you, is the fact that she  
 17 said she traveled on Epstein's planes an  
 18 obvious lie?  
 19 A. I think we can probably say because  
 20 you see her name on a plane record and she  
 21 went from A to B, that would not be the  
 22 obvious lie that I would pick.  
 23 Q. What obvious lie were you picking  
 24 when you made this statement?  
 25 A. There are so many that I would be

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1 G Maxwell - Confidential  
 2 thrilled to go through all of them.  
 3 Q. Let's go through them.  
 4 What's the first one?  
 5 A. Her characterization of the first  
 6 meeting at Mar-a-Lago.  
 7 Q. What part of that was an obvious  
 8 lie?  
 9 A. The characterization that she said  
 10 that she said she was accosted. She looked  
 11 like, as best as I can recall, if I met her  
 12 in Mar-a-Lago as she claims, she worked at  
 13 Mar-a-Lago, she claims, and her statement she  
 14 worked at Mar-a-Lago, she would have been  
 15 dressed as all the spa people in Mar-a-Lago  
 16 would have been. It would have been  
 17 impossible to identify her as someone other  
 18 than someone who worked at a spa. She made  
 19 many claims, she has been a bathroom  
 20 attendant, front of house attendant, we don't  
 21 know what she was, so her obvious lies are  
 22 her contradictory of her own personal  
 23 statements within that.  
 24 Q. So what part of her statement  
 25 relating to Mar-a-Lago --

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1 G Maxwell - Confidential  
 2 A. I'm carrying on.  
 3 Q. I'm sorry. I thought you were  
 4 done.  
 5 A. Please. Her statement also that  
 6 she was driven by her father to Palm Beach.  
 7 She was driven by her mother, as a matter of  
 8 fact. Her whole entire characterization of  
 9 the first meeting with Jeffrey, as I was  
 10 outside speaking to her mother.  
 11 Q. Let me stop you there, so we don't  
 12 get too far ahead. Let me make sure I  
 13 understand your testimony.  
 14 The first, in the first piece when  
 15 you were talking, I believe you said and  
 16 correct me if I'm wrong, that her  
 17 characterization of the first meeting at  
 18 Mar-a-Lago was an obvious lie.  
 19 What part of that meeting was an  
 20 obvious lie?  
 21 A. By her own testimony, all her  
 22 various many different descriptions of what  
 23 she was or wasn't or where she was or wasn't,  
 24 they have all changed. She was either front  
 25 of house or bathroom attendant. I don't know

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1 G Maxwell - Confidential  
 2 what she was, so just by her own words, one  
 3 doesn't know what's true and what isn't true.  
 4 Q. Are you saying what position she  
 5 said she was working in, is that what you are  
 6 considering the obvious lie?  
 7 A. I said inconsistency within her own  
 8 statement from everything, so in the  
 9 beginning it starts off with different  
 10 statements.  
 11 Q. Then I believe you said the second  
 12 piece was that she was driven by her father?  
 13 A. I said she was driven by her  
 14 mother.  
 15 Q. That's the obvious lie?  
 16 A. It's an obvious lie to me.  
 17 Q. You said why don't you state it in  
 18 your own words but the characterization of  
 19 how she was with Jeffrey, what about that is  
 20 an obvious lie?  
 21 A. I was standing outside talking to  
 22 her mother so the entire story is a  
 23 fabrication.  
 24 Q. Did she not have sex with Jeffrey  
 25 Epstein during that first massage?

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 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I was talking to her mother so...  
 5 Q. Do you know whether that's an  
 6 obvious lie, whether she had sex in that room  
 7 or not?  
 8 A. Her story about what happened --  
 9 let's also be -- the story as first hit the  
 10 press was that somebody else led her to  
 11 Jeffrey's room, it was not me and then it  
 12 turned to being me so we have an obviously  
 13 important inconsistency, lie in my -- that's  
 14 how I would characterize a lie. It cannot be  
 15 me or somebody else, it can only be one or  
 16 the other.  
 17 Q. Who is the other person she said  
 18 took her to the room?  
 19 A. Why don't you ask her.  
 20 Q. I'm asking you.  
 21 A. How would I possibly know.  
 22 Q. You are saying that's a lie.  
 23 A. It was a lie in the papers, she  
 24 said it in the newspaper, it was in the  
 25 newspaper.

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1 G Maxwell - Confidential  
 2 Q. How do you know she wasn't  
 3 identifying you?  
 4 A. She said somebody.  
 5 Q. How do you know that somebody  
 6 wasn't you?  
 7 A. Why did it suddenly become me, why  
 8 not say it was me and be done with it.  
 9 Q. So it's a lie because she  
 10 originally may not have named you and then  
 11 named you later?  
 12 A. It's obviously inconsistent to  
 13 somebody who wasn't me.  
 14 Q. How do you know it wasn't you?  
 15 A. I know it wasn't me because I was  
 16 talking to her mother.  
 17 Q. But she then named you, is what you  
 18 are saying?  
 19 A. That's an obvious lie.  
 20 Q. She named you?  
 21 A. It's an obvious lie because I  
 22 wasn't even in the house.  
 23 Q. Is it an obvious -- who did lead  
 24 her up to Jeffrey's room while you were  
 25 talking to her mother?

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1 G Maxwell - Confidential  
 2 A. You would have to ask Virginia, I  
 3 don't know if she was led up to his room.  
 4 Q. You were standing with the mother,  
 5 is that correct?  
 6 A. That's correct.  
 7 Q. Who was working at the house that  
 8 day?  
 9 A. I believe John Alessi was.  
 10 A. Would John Alessi typically lead  
 11 someone up to the room where Jeffrey was  
 12 having a massage?  
 13 A. I don't know she was led up to the  
 14 room to have a massage.  
 15 Q. She would have found her way on her  
 16 own?  
 17 A. I would suggest that that entire  
 18 story never happened at all in any of its  
 19 form.  
 20 Q. If you stood outside with the  
 21 mother, what did you think happened inside  
 22 then?  
 23 A. I believe that somebody, it wasn't  
 24 me, John Alessi probably took her to meet  
 25 Jeffrey Epstein while he was working at his

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1 G Maxwell - Confidential  
 2 desk and they had a conversation.  
 3 Q. Did Jeffrey tell you that?  
 4 A. No but that would have been a  
 5 normal interaction. I don't believe for a  
 6 second -- I know her entire characterization  
 7 didn't happen because I was outside talking  
 8 to her mother the entire time.  
 9 Q. Why would she have come for a  
 10 massage and not given a massage?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. We are talking about her  
 14 characterization of the first time that she  
 15 came to the house.  
 16 Q. If I'm following you correctly,  
 17 you're saying she walked in and would have  
 18 gone to -- it's your assumption she would  
 19 have gone and talked to Jeffrey and left?  
 20 A. When I was working for Jeffrey,  
 21 typically he would meet someone before  
 22 getting a massage from them to see if he  
 23 wanted to have a massage from them,  
 24 typically.  
 25 Q. So he would not have someone come

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1 G Maxwell - Confidential  
 2 up to the room and start a massage?  
 3 A. He would not.  
 4 Q. So the young girls in the police  
 5 report who say they came over and were led up  
 6 to the room on the first day, would they be  
 7 wrong about that?  
 8 MR. PAGLIUCA: Objection to form  
 9 and foundation.  
 10 A. I can't comment what happened when  
 11 I was not at the house. I can only comment  
 12 when I was at the house.  
 13 Q. Was there ever a time where a woman  
 14 came to the house for the first time to give  
 15 a massage and Jeffrey had the massage that  
 16 day?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. Can we talk about adult  
 20 professional masseuses, please?  
 21 Q. I'm asking, whether adult or  
 22 underage?  
 23 A. I'm not interested in talking about  
 24 underage. I can only testify to what I know,  
 25 professional masseuses, adult, I cannot

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1 G Maxwell - Confidential  
 2 testify to anything else.  
 3 Q. Why can't you testify to an  
 4 underage girl that came over and was led up  
 5 to the room for a massage?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. The police records you are  
 9 referring to?  
 10 Q. You are saying that didn't happen.  
 11 You're saying I can only testify to adults  
 12 that came for an interview and were led up to  
 13 the room. Why can't you testify to whether  
 14 an underage girl was brought in for an  
 15 interview and led up --  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 Q. Go ahead.  
 19 A. Can you reask the question.  
 20 Q. Why can't you testify as to an  
 21 underage girl who came over for an interview  
 22 and then was then led up to the room for the  
 23 massage?  
 24 A. You've mangled your entire  
 25 question. Can you please reask that in a way

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1 G Maxwell - Confidential  
 2 that I can answer it correctly?  
 3 Q. Why can you not testify as to  
 4 whether an underage girl, you said you can  
 5 testify as to females that were over the age  
 6 of 18, why can't you testify as to whether an  
 7 underage girl came over for an interview and  
 8 on the same day --  
 9 A. I don't know what you mean by  
 10 interview.  
 11 Q. You just said that Jeffrey Epstein  
 12 interviewed, it was your word, interviewed  
 13 the masseuses before they gave massages, is  
 14 that correct?  
 15 A. The word interview is making me --  
 16 I'm English, so you could have some  
 17 difficulty understanding the way I  
 18 communicate.  
 19 Q. I'm using your word.  
 20 A. Then I will reuse it a different  
 21 word. He would meet them because receiving a  
 22 massage is something you want to make sure  
 23 you are comfortable with the person and so  
 24 interview is not the correct word but you  
 25 would meet them to have a conversation with

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1 G Maxwell - Confidential  
 2 them to see if you want to have a massage  
 3 with that person.  
 4 Q. Did Jeffrey Epstein ever meet an  
 5 underaged girl and on the same day receive a  
 6 massage from that girl?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I can't possibly testify to what  
 10 happened after I was not at the house.  
 11 Q. If you are aware, at any time you  
 12 were at the house, did you ever see that?  
 13 MS. MENNINGER: Let her finish the  
 14 question.  
 15 A. I can only testify to people who  
 16 were adult professional masseuses who came to  
 17 the house. I cannot testify to something I'm  
 18 not party to and don't know about. I can  
 19 only testify to what I saw. So when  
 20 professional adult masseuse, male and/or  
 21 females would come to the house, typically  
 22 when I was there, typically he would meet  
 23 with them prior, to have a conversation with  
 24 them about their experience, whatever, to  
 25 decide whether it would then A, if he had

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1 G Maxwell - Confidential  
 2 time for a massage at that time or B, whether  
 3 he could have a massage at that moment.  
 4 Q. Was Virginia an adult when she came  
 5 over, was she over 18?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I think we established, as of  
 9 today, we are all aware, everyone in this  
 10 room that she was 17.  
 11 Q. So you have been present when a  
 12 minor was brought over for a massage for  
 13 Jeffrey?  
 14 A. Can I say, as you are able to have  
 15 a massage at 17, so she came as a masseuse.  
 16 Q. I'm not saying whether or not you  
 17 are able to. I'm saying you've been present  
 18 at Jeffrey's home when an underage minor has  
 19 come over to give him a massage?  
 20 A. That's just not how that works.  
 21 You are able to be a masseuse at 17 so she  
 22 came to give -- for a massage, at 17 you are  
 23 able to come and give a massage.  
 24 Q. I'm not asking whether she is able  
 25 to do it. I'm asking whether you were

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1 G Maxwell - Confidential  
 2 present at the home when a girl under the age  
 3 of 18 came over for the purposes of giving a  
 4 massage?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 Q. You can answer.  
 8 A. You can be a professional masseuse  
 9 at 17 in Florida, so as far as I am aware, a  
 10 professional masseuse showed up for a  
 11 massage. There is nothing inappropriate or  
 12 incorrect about that and your  
 13 mischaracterization of it, I think is  
 14 unfortunate.  
 15 Q. How many teenagers did he have that  
 16 were professional masseuses that worked in  
 17 his home?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 Q. How many?  
 21 A. First of all, I am not aware of  
 22 teenagers who worked in his home.  
 23 Q. You are aware of Virginia Roberts  
 24 and you've stated she was 17 and she worked  
 25 for him, correct?

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1 G Maxwell - Confidential  
 2 A. No. I did not state that at all,  
 3 you are mischaracterizing my words and what I  
 4 said.  
 5 What I said was that we can all  
 6 agree and I think at this point there is not  
 7 one person in this room, however much you  
 8 would like her to be younger, to say she was  
 9 not 17 because that has been a very offensive  
 10 thing that you have all done. So she was 17.  
 11 At 17 you are allowed to be a professional  
 12 masseuse and as far as I'm concerned, she was  
 13 a professional masseuse. There is nothing  
 14 inappropriate or incorrect about her coming  
 15 at that time to give a massage. Her entire  
 16 characterization of her first time at the  
 17 house was to me an obvious lie, given it was  
 18 impossible for her entire story to take place  
 19 given I was speaking to her mother the entire  
 20 she was at the house.  
 21 Q. So it was impossible that day, that  
 22 first day she came and you were speaking to  
 23 the mother, for Virginia Roberts to have had  
 24 sex with Jeffrey Epstein during the time that  
 25 you were outside with her mother?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. You, again, are completely  
 5 mischaracterizing. I can only testify to  
 6 what I heard obvious lies about me and her  
 7 obvious lies about me are that she, as you  
 8 put out to the papers and every other which  
 9 way, went upstairs with her, didn't happen.  
 10 So that to me is an absolute, obvious lie. I  
 11 also don't believe that her -- her  
 12 mischaracterization of the length of time she  
 13 was there because as I recall, she just met  
 14 with Jeffrey and then left with her mother.  
 15 That's my recollection.  
 16 Q. So you were standing outside the  
 17 entire time that Virginia was in the house,  
 18 is that correct?  
 19 A. That is correct.  
 20 Q. So can you testify as to whether or  
 21 not, do you know either from Jeffrey or any  
 22 other source whether or not Virginia Roberts  
 23 had sex with Jeffrey on that first day that  
 24 she was at the house?  
 25 A. We can categorically state,

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1 G Maxwell - Confidential  
 2 absolutely 1000 percent that she did not have  
 3 any type of sexual relations as described by  
 4 you in your court papers that took place  
 5 because those allegedly according to her lies  
 6 involved some aspect of me.  
 7 As I was standing outside with her  
 8 mother the entire time, her entire story is a  
 9 lie. Therefore, to ask me what she did or  
 10 didn't do during that time, I can only  
 11 testify to what she said about me, which was  
 12 1000 percent false.  
 13 Q. So let's not take the first time,  
 14 let's take the next time she comes.  
 15 A. No no, how can do you that, when  
 16 the basis of this entire horrible story that  
 17 you have put out is based on this first  
 18 appalling story that was written, repeated,  
 19 multiply by the press that lied about her  
 20 age, lied about the first time she came, lied  
 21 about and characterized the entire first  
 22 time. I have been so absolutely appalled by  
 23 her story and appalled by the entire  
 24 characterization of it and I apologize  
 25 sincerely for my banging at the table

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1 G Maxwell - Confidential  
 2 earlier, I hope you accept my apology. It's  
 3 borne out of years of feeling the pressure of  
 4 this entire lie that she has perpetrated from  
 5 our first time and whilst I recognize that  
 6 was -- I hope you forgive me sincerely  
 7 because it was just the length of time that  
 8 that terrible story has been told and retold  
 9 and rehashed when I know it to be 100 percent  
 10 false.  
 11 Q. So not the first time she came, but  
 12 the second time she came or the third time or  
 13 any time she came, did you ever participate  
 14 in a massage with her in Jeffrey Epstein's  
 15 room?  
 16 A. I have never participated at any  
 17 time with Virginia in a massage with Jeffrey.  
 18 Q. Have you ever participated at any  
 19 time with Virginia in any kind of sexual  
 20 contact or sexual touching with Jeffrey and  
 21 Virginia?  
 22 A. I have not.  
 23 Q. So we were going through the list  
 24 of obvious lies and you were talking about  
 25 the first time which I believe we have

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1 G Maxwell - Confidential  
 2 completed but you can add to that if you need  
 3 to.  
 4 What other obvious lies did  
 5 Virginia Roberts tell that you were referring  
 6 to in your statement?  
 7 A. Oh my goodness. Well, I think we  
 8 can totally cover the Clinton story, the  
 9 story that I flew him with Secret Service and  
 10 there was a dinner with other people and that  
 11 entire thing is 100 percent fictitious. I  
 12 have testified for the record and I'm happy  
 13 to do it again, that I have never flown Bill  
 14 Clinton, myself as a pilot in a helicopter at  
 15 any time, anyplace, at any time, to any part  
 16 of the world.  
 17 Q. What other obvious lies were you  
 18 referring to?  
 19 A. She was referring to Al Gore, she  
 20 is referring to a bunch of people. I don't  
 21 believe Al Gore ever came to the island at  
 22 any time ever. I don't even know Al Gore  
 23 actually.  
 24 Q. Just one moment, I want to hear all  
 25 of them, but when you say you don't believe

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1 G Maxwell - Confidential  
 2 Al Gore ever came to the island, do you know  
 3 whether Al Gore ever came to the island?  
 4 A. Al Gore never came to the island.  
 5 Q. How do you know that?  
 6 A. Jeffrey doesn't know him, I don't  
 7 know him and I think had Al Gore -- I don't  
 8 think -- had Al Gore gone to the island  
 9 during the period when I would have been  
 10 involved in organizing a trip, I would have  
 11 been aware of it.  
 12 Q. So go ahead, you had another one.  
 13 A. It would be easier if I could see,  
 14 do you mind if I take a reference at some of  
 15 these newspaper articles or you just want me  
 16 to go from memory.  
 17 Her entire characterization of what  
 18 took place in London at my house with Prince  
 19 Andrew.  
 20 Q. Was it an obvious lie that she was  
 21 at your house in London?  
 22 A. We can't really establish the  
 23 photograph and all that. I don't know if  
 24 that's true, if that's a real picture or not.  
 25 Q. So you dispute that you were

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1 G Maxwell - Confidential  
 2 actually photographed in your town home in  
 3 London --  
 4 A. I don't recognize that picture.  
 5 I'm not sure if that's a real picture or not.  
 6 Q. And have you talked to Prince  
 7 Andrew about that picture?  
 8 A. We discussed Virginia's entire tail  
 9 and he asked me if he even knew her.  
 10 Q. So did Prince Andrew tell you that  
 11 he did not have sex with Virginia Roberts?  
 12 A. He doesn't even know who Virginia  
 13 Roberts is.  
 14 Q. Did he tell you that he didn't have  
 15 sex with her?  
 16 A. It would be difficult to have sex  
 17 with someone you don't know.  
 18 Q. He may not remember her?  
 19 A. I think the inference is he didn't  
 20 know who she was, he didn't have any  
 21 recollection of her whatsoever.  
 22 Q. Has Prince Andrew ever come to your  
 23 London town home?  
 24 A. Yes. Ever being the entire time I  
 25 owned my house, yes.

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1 G Maxwell - Confidential  
 2 Can I go on on her obvious lies?  
 3 Q. If you have more.  
 4 A. I have -- her entire  
 5 characterization -- I took her shopping into  
 6 Burberry and bought her a very expensive  
 7 dress and if this photo were real and if this  
 8 is -- I would never -- the outfit doesn't  
 9 work at all so --  
 10 Q. Do you not remember taking her  
 11 shopping or are you saying it's an obvious  
 12 lie, you know you did not take her shopping?  
 13 A. I did not take her shopping. I did  
 14 not buy her a \$5,000 handbag.  
 15 Q. Did Jeffrey buy her a \$5,000  
 16 handbag?  
 17 A. Her accusation was that I did.  
 18 Q. Do you know if Jeffrey bought her a  
 19 handbag during that trip to London?  
 20 A. I don't know what he did. She  
 21 accused me, I can't physically remember  
 22 buying a \$5,000 not for her, not for anyone,  
 23 not for me.  
 24 Q. Did you ever go shopping with  
 25 Virginia?

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1 G Maxwell - Confidential  
 2 A. I don't recall ever shopping with  
 3 Virginia.  
 4 Q. Did you have more to go over or did  
 5 you want me to ask my questions?  
 6 A. The entire characterization of what  
 7 took place in my house in London would have  
 8 been impossible.  
 9 Q. Can I ask, do you still have it,  
 10 the picture of the London town home with you  
 11 in it, Giuffre 00407.  
 12 As you are looking at this picture,  
 13 Ms. Maxwell, as I'm looking at it it's on the  
 14 right-hand side, there appears to be a  
 15 picture hanging on the wall, do you recall  
 16 that in your London town home?  
 17 A. It's a little difficult to see.  
 18 Q. Do you recall having a picture on  
 19 the wall there by the room where you're  
 20 standing?  
 21 A. I do have a picture.  
 22 Q. Do you recall on the left-hand side  
 23 having a railing that looks like that with  
 24 sort of a bubble wood top?  
 25 A. I do.

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1 G Maxwell - Confidential  
 2 Q. So are you saying that it's an  
 3 obvious lie that Virginia's statement that  
 4 she had sex with Prince Andrew is an obvious  
 5 lie?  
 6 A. What I'm representing is that her  
 7 entire ludicrous and absurd story of what  
 8 took place in my house is an obvious lie.  
 9 Q. Including she had sex with Prince  
 10 Andrew?  
 11 A. She claimed things took place in my  
 12 bathroom in London. Her characterizations is  
 13 just not possible.  
 14 Q. So you're saying it's an obvious  
 15 lie -- that she was telling an obvious lie  
 16 when she said she had sex with Prince Andrew?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation. The witness  
 19 answered the question.  
 20 A. I'm saying within the context of  
 21 all the stories she told, this particular  
 22 story -- back up, she claimed we went out at  
 23 night. I've already testified if -- Prince  
 24 Andrew is such a famous person, if he went to  
 25 a nightclub, it would have been reported by

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1 G Maxwell - Confidential  
 2 the press at that time. She characterized  
 3 that Prince Andrew drank alcohol. Prince  
 4 Andrew tea total.  
 5 She then characterized things took  
 6 place in my bathroom in the bathtub itself.  
 7 The tub is too small for any type of activity  
 8 whatsoever.  
 9 Q. Is Club Tramp the name of a London  
 10 club, is that a club you heard of?  
 11 A. It's not called Club Tramp, it's  
 12 called Tramp.  
 13 Q. That would be a club located in  
 14 London?  
 15 A. Yes.  
 16 Q. Are you saying that it was an  
 17 obvious lie when Virginia said that you made  
 18 her dress up in a school girl outfit?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I already testified that, first of  
 22 all, I don't know what you are taking about,  
 23 I already testified I didn't get her outfits  
 24 and all of that.  
 25 Q. Is it an obvious lie that Virginia

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 2 was paid to go to give a massage to Glenn  
 3 Dubin at the Breakers?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I cannot testify to what Virginia  
 7 did outside of -- I can't testify to what she  
 8 did, who she gave massages to.  
 9 Q. So you don't know on that one?  
 10 A. Of course I don't know.  
 11 Q. Do you agree that it's  
 12 psychologically harmful to have sex with a  
 13 minor?  
 14 MR. PAGLIUCA: Objection to form  
 15 and foundation.  
 16 A. What are you asking me?  
 17 Q. I'm asking if it is psychologically  
 18 harmful for an adult to have sex with a  
 19 minor?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I don't know what you are asking.  
 23 This has nothing to do with Virginia Roberts.  
 24 Q. It does.  
 25 A. How does it?

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 2 Q. I ask the questions, you answer.  
 3 If you can't answer, you can say I don't  
 4 know.  
 5 But my question is, do you agree  
 6 that it's psychologically harmful to have sex  
 7 with a minor?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. Are you giving me a random question  
 11 and as not relates to this case and not  
 12 relates to anything. It's obviously not  
 13 something that you want to have happen.  
 14 Q. Do you agree that Jeffrey Epstein  
 15 has harmed many minors by having sex with  
 16 them?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I can't testify to what Jeffrey did  
 20 or didn't do. I have no knowledge of what  
 21 you are asking me.  
 22 Q. If Jeffrey had sex with minors,  
 23 would you agree that that could harm a minor?  
 24 MR. PAGLIUCA: Objection to the form  
 25 and foundation.

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 2 A. Again, I am not testifying to what  
 3 Jeffrey did or did not do because I cannot.  
 4 Q. You don't know whether Jeffrey  
 5 Epstein ever had sex with a minor?  
 6 A. Again, I cannot testify to what  
 7 Jeffrey did or didn't do. I cannot.  
 8 Q. You never observed him having sex  
 9 with a minor?  
 10 A. I never observed Jeffrey having sex  
 11 with a minor.  
 12 Q. Do you agree that calling a sex  
 13 abuse victim a liar when she speaks about her  
 14 abuse can cause psychological harm?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. Can you repeat the question.  
 18 Q. Do you agree calling a sex abuse  
 19 victim when she speaks about her abuse can  
 20 cause psychological harm?  
 21 MR. PAGLIUCA: Objection to form  
 22 and foundation.  
 23 A. Say it again.  
 24 Q. Do you agree that calling a sexual  
 25 abuse victim a liar can cause psychological

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 2 harm.  
 3 MR. PAGLIUCA: Object to the form  
 4 form and foundation.  
 5 A. I would like to say all the  
 6 terrible things Virginia Roberts said about  
 7 me is extremely harmful and you should turn  
 8 that around. All the lies she has said and  
 9 you have backed her on have been extremely  
 10 damaging to me.  
 11 So what I can testify to is that  
 12 somebody who has made these outrageous  
 13 allegations and who is a serious liar and  
 14 that I know for a fact is a liar, that I can  
 15 testify is damaging to me.  
 16 Q. Do you agree that calling a sexual  
 17 abuse victim a liar when she speaks out about  
 18 her abuse can cause psychological harm?  
 19 MR. PAGLIUCA: Are you asking a  
 20 hypothetical question?  
 21 MS. McCAWLEY: Yes.  
 22 A. You are asking me to speculate?  
 23 Q. I'm not asking you to speculate .  
 24 If somebody is a sexual abuse victim --  
 25 A. I can't testify to what some random

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 2 hypothetical person that you are asking me to  
 3 speculate on their mental state or health  
 4 versus speculative statement. I can't do  
 5 that, that's just not right.  
 6 Q. Do you agree that by calling  
 7 Virginia Roberts a liar when she was subject  
 8 to sexual abuse by Jeffrey Epstein can cause  
 9 psychological harm?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation. Assumes facts not  
 12 in evidence.  
 13 A. I can only tell you about what I  
 14 know of Virginia's lies. She lied  
 15 repeatedly, often and I know for a fact she  
 16 is a liar so I can only testify to what I  
 17 know and the fact that she has lied about me  
 18 from the beginning to the end and repeatedly  
 19 causes me to question anything that she may  
 20 feel.  
 21 Q. Is it an obvious lie you had sex  
 22 toys in Jeffrey Epstein's Palm Beach house?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Can you repeat the question,



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 2 please?  
 3 Q. Is it an obvious lie that you had  
 4 sex toys in Jeffrey Epstein's Palm Beach  
 5 house?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. Did Virginia say that?  
 9 Q. I'm asking you a question.  
 10 Is it an obvious lie that you had  
 11 sex toys in Jeffrey Epstein's house?  
 12 A. I don't recall any sex toys.  
 13 Q. If someone said had you sex toys,  
 14 would that be an obvious lie?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. Like I said -- can you be more  
 18 specific about the house or whatever, what  
 19 exactly you are referring to, what's a sex  
 20 toy?  
 21 Q. Yes. How would you define a sex  
 22 toy?  
 23 A. No. I need you to define a sex  
 24 toy, I don't have enough knowledge of sex  
 25 toys.

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 2 Q. I will define it based on the  
 3 dictionary's definition, which is an object  
 4 or device used to sexually stimulate or  
 5 enhance sexual pleasure.  
 6 A. What's your question, please?  
 7 Q. The question is, is it an obvious  
 8 lie that you had sex toys in Jeffrey  
 9 Epstein's Palm Beach house?  
 10 MR. PAGLIUCA: Same objection.  
 11 Q. You can answer.  
 12 A. Like I said, I do not have any  
 13 recollection of sex toys in Jeffrey's house.  
 14 Q. Is it a lie, is it an obvious lie  
 15 that you took pictures of nude girls?  
 16 MR. PAGLIUCA: Object to the form  
 17 and foundation.  
 18 A. We already covered this. Girls we  
 19 are not referring to -- I can only testify to  
 20 taking pictures of adult people and I already  
 21 testified they are not nude, per se. That  
 22 every picture that I ever took and which they  
 23 were very limited, always by request, the  
 24 people would be covered or it would be a hand  
 25 or a foot. There was never any pictures that

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 2 I took of people would only have been  
 3 mainstream type magazine type photos and any  
 4 photos I took could have been very happily  
 5 and expected to be displayed on your parents'  
 6 mantel piece or grandparents' mantel piece.  
 7 Q. Is it a lie that you approached  
 8 females to bring them to Jeffrey Epstein?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. Please ask the question, again.  
 12 Q. Sure. Is it a lie that you  
 13 approached females to bring them to Jeffrey  
 14 Epstein?  
 15 A. I don't know what you are asking  
 16 me.  
 17 Q. I'm asking you, if it's a lie that  
 18 you approached females to bring them to  
 19 Jeffrey Epstein?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. You are not asking me a good  
 23 question, sorry.  
 24 Q. You don't get to choose the  
 25 questions.

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 2 A. I would like to answer your  
 3 questions but you are not asking me a  
 4 question that I can answer.  
 5 Q. What about that is causing you  
 6 pause where you can't answer the question?  
 7 A. You are trying to trap me and  
 8 that's not fair, so I already testified that  
 9 I hire people across the board, so I would  
 10 hire architects, decorators, pool people,  
 11 exercise instructors, gardeners, cooks,  
 12 chefs, cleaning people. So I, in the course  
 13 of a very long time when I would hire people  
 14 I hired people to work for Jeffrey. So I'm  
 15 happy to testify to hiring people for every  
 16 possible conceivable proper job that you  
 17 could conceive of within the context of  
 18 Jeffrey's life and homes.  
 19 Q. Is it a lie that you approached  
 20 females to bring them to Jeffrey Epstein for  
 21 the purpose of performing massages?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Again, I have already testified  
 25 that part of the job that I had was to hire

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 2 lots of different types of people. In terms  
 3 of whatever -- very small part of my job,  
 4 Jeffrey enjoyed getting massages. I think  
 5 that is something we can all agree in this  
 6 room and within the context of that, very  
 7 infrequently I would go to spas and myself  
 8 happily receive a professional nonsexual  
 9 massage from a man and/or from a woman and if  
 10 that massage was something that I thought was  
 11 something that was good, I would ask if that  
 12 man or woman would come back and does home  
 13 visits. If that person said that they did,  
 14 they would sometimes come, from time to time,  
 15 not always, come back to the house to perform  
 16 a nonsexual professional male or female  
 17 massage.  
 18 Q. Were any of the exercise  
 19 instructors you hired under the age of 18?  
 20 A. Again, I don't hire, we've already  
 21 established that I don't hire people. I  
 22 interview people to see if they are competent  
 23 in the job that they do and/or whether they  
 24 are someone who seemed that they can do home  
 25 visits.

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 2 At the point where I think that  
 3 there is somebody that has, can be either  
 4 whatever the job may be, pool, gardener, chef  
 5 and/or exercise instructor and I think they  
 6 could be good at whatever it is at whatever  
 7 skill that they had and they did a home visit  
 8 which would obviously be mandatory and Mr.  
 9 Epstein would meet with them and decide if he  
 10 wanted to have whatever skill it was that he  
 11 would do it and then he would then either  
 12 have them come back or hire them.  
 13 Q. Were there any exercise instructors  
 14 that worked at the home that were under the  
 15 age of 18?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. Again, I keep coming back to this,  
 19 that the people that I employed or -- not the  
 20 right word, the people I would meet to come  
 21 and work at the house, under any guise  
 22 whatsoever, again, from any of the many  
 23 positions that I filled, were all over --  
 24 were adults.  
 25 Q. When you say adults, over the age

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 2 of 18?  
 3 A. I think we can establish what adult  
 4 would be.  
 5 Q. You never interviewed or I know you  
 6 don't want to use the word hired, whatever  
 7 your role was, you brought in an exercise  
 8 instructor that was under the age of 18 to  
 9 work at the house?  
 10 MR. PAGLIUCA: Object to the form  
 11 and foundation.  
 12 A. I have already testified that what  
 13 I was responsible for was to find people who  
 14 had competencies in whatever area I was  
 15 looking for. The competencies I was looking  
 16 for were professional and adult.  
 17 Q. So there was no exercise instructor  
 18 that worked at the Palm Beach house or the  
 19 New York house or the New Mexico house or the  
 20 USVI under the age of 18?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I can only testify to when I was at  
 24 the house.  
 25 Q. Yes.

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 2 A. I can only testify to the years  
 3 when I was present.  
 4 Q. Right.  
 5 A. And I can also only testify to  
 6 people I personally either met and/or worked  
 7 with and/or invited, to find the correct  
 8 word, I don't know what the correct word is,  
 9 to come to do exercise or whatever it was at  
 10 the house.  
 11 Of the people that I, male and/or  
 12 female that I brought were all appropriate  
 13 and age appropriate adults.  
 14 Q. Over the age of 18?  
 15 A. We've established them as an adult.  
 16 Q. You are saying appropriate adults,  
 17 so we are clear, you didn't hire or bring in  
 18 or know of any exercise instructors that were  
 19 under the age of 18 at any of those homes?  
 20 A. I am also testifying that when I  
 21 was present at the house and with the people  
 22 that I brought in, were all age appropriate  
 23 adults.  
 24 Q. How do you define age appropriate  
 25 adults, is that over the age of 18, can we

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 2 agree to that?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 Q. Are they under the age of 18?  
 6 A. We already established that you can  
 7 be a masseuse in Florida at age 17. That  
 8 does not make it inappropriate.  
 9 A. I'm not saying appropriate or  
 10 inappropriate. I'm just asking if there were  
 11 any exercise instructors that were under the  
 12 age of 18.  
 13 A. I am not aware if anybody was but I  
 14 don't want to full out and say you oh she  
 15 said, we already established you can be a 17  
 16 year old masseuse and have it not be  
 17 something that is not appropriate. So when  
 18 you say that and then you go, well, you come  
 19 back and say something, now we can establish  
 20 that Virginia was 17 but you can be a 17 year  
 21 old legal masseuse, but I am not aware to  
 22 your point.  
 23 Q. Who were the other 17 year old  
 24 masseuses that you were aware of?  
 25 A. I am not aware of any.

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 2 Q. Were there any 16 year year old  
 3 masseuse that you are aware of?  
 4 A. I am not aware.  
 5 Q. Any 15?  
 6 A. I just want to be clear. The only  
 7 person that I am aware of who claims to have  
 8 been a -- we have to -- we established  
 9 Virginia now is 17, given she has changed her  
 10 age so many times. The only person that I am  
 11 aware of that was a masseuse at the time when  
 12 I was present in the house was Virginia.  
 13 Q. Is it an obvious lie that Jeffrey  
 14 Epstein had a sexual preference for underage  
 15 miners?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. Can you ask the question again?  
 19 Q. It is it an obvious lie that  
 20 Jeffrey Epstein had a sexual preference for  
 21 underage minors?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Can you ask the question again?  
 25 Q. Is it an obvious lie that Jeffrey

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 2 Epstein had a sexual preference for underage  
 3 minors?  
 4 MR. PAGLIUCA: Object to the form  
 5 and foundation.  
 6 A. I cannot testify to what  
 7 Jeffrey's --  
 8 Q. You don't know his preference?  
 9 A. You handed me a stack of papers  
 10 from the police reports and that's what I've  
 11 read but I have no knowledge, direct  
 12 knowledge, of what you are referencing.  
 13 Q. So you don't know, you don't know  
 14 in your own mind that Jeffrey Epstein had a  
 15 sexual preference for underage minors, is  
 16 that correct?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 Q. Is that correct?  
 20 A. Please ask the question again.  
 21 Q. You don't know in your own mind  
 22 that Jeffrey Epstein had a sexual preference  
 23 for underage minors?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation. You have to pause,

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 2 let me object, answer the question.  
 3 Listen to her question, pause, I object,  
 4 you answer.  
 5 Q. So you don't know in your own mind  
 6 that Jeffrey Epstein had a sexual preference  
 7 for underage minors?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 Q. You can answer.  
 11 A. I cannot tell you what Jeffrey's  
 12 story is. I'm not able to.  
 13 Q. Did Jeffrey Epstein have a scheme  
 14 to recruit underage girls to use them for  
 15 purposes of sexual massages?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. Can you ask me again, please?  
 19 Q. Did Jeffrey Epstein have a scheme  
 20 to recruit underage girls to recruit them for  
 21 sexual massages?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Can you ask it a different way?  
 25 Q. Did Jeffrey Epstein have a scheme

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1 G Maxwell - Confidential  
 2 to recruit underage girls for sexual  
 3 massages?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 Q. If you know.  
 7 A. I don't know what you are talking  
 8 about.  
 9 Q. Is it an obvious lie that Virginia  
 10 Giuffre was a minor the first time she was  
 11 taken to Jeffrey Epstein's house?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. So we've already established that  
 15 Virginia was 17 and we have established that  
 16 her mother brought her to the house and that  
 17 she came as a masseuse, age 17, which is  
 18 legal in Florida.  
 19 Q. Would Jeffrey Epstein's assistants  
 20 arrange times for underage girls to come to  
 21 the house for sexual massages?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. What are you talking about?  
 25 Q. Sure. Would Jeffrey Epstein's

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 2 assistants, I think earlier you mentioned, we  
 3 talked about Sarah Kellen who worked in the  
 4 role as an assistant or Nadia Marcinkova.  
 5 Would Jeffrey Epstein's assistants arrange  
 6 times for underage girls to come over the  
 7 house for sexual massages?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. Again, I read the police reports so  
 11 this is all happening according to the police  
 12 reports when I am no longer at the house so I  
 13 can't testify to what Jeffrey's assistants  
 14 did when this kind of activity as alleged in  
 15 the reports.  
 16 Q. So you don't know?  
 17 A. No.  
 18 Q. Would Jeffrey Epstein's assistants,  
 19 meaning Sarah Kellen, Nadia Marcinkova or any  
 20 other assistant that you are aware of from  
 21 the time you worked there take nude  
 22 photographs of underage girls?  
 23 MR. PAGLIUCA: Object to the form  
 24 and foundation.  
 25 A. During what period of time?

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 2 Q. During any period of time you  
 3 worked, did you observe that?  
 4 A. I did not observe any such  
 5 photographs.  
 6 Q. Are you aware if they took those  
 7 kinds of photos?  
 8 A. I am not aware.  
 9 MR. PAGLIUCA: Can we take a  
 10 five-minute break.  
 11 THE VIDEOGRAPHER: It's 2:58 and we  
 12 are off the record.  
 13 (Recess.)  
 14 THE VIDEOGRAPHER: It's now 3:10.  
 15 We're starting disk No. 6 and we are  
 16 back on the record.  
 17 Q. Ms. Maxwell, was it an obvious lie  
 18 when Virginia said she was sent to Thailand  
 19 by Epstein in September of 2002?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I have no knowledge of Virginia  
 23 being sent to Thailand.  
 24 But may I say something?  
 25 Q. There is not a question pending

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 2 unless you want to clarify something.  
 3 Did you want to clarify that?  
 4 A. No, I just wanted to say something.  
 5 Q. Is it an obvious lie when Virginia  
 6 said she was given instructions to maintain  
 7 telephone contact with you while she was in  
 8 Thailand?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. Can you repeat the question?  
 12 Q. Is it an obvious lie when Virginia  
 13 said she was given instructions to maintain  
 14 telephone contact with you when she was in  
 15 Thailand?  
 16 MR. PAGLIUCA: Same objection.  
 17 A. I have no idea what instructions  
 18 Virginia was given, if any, when she went to  
 19 Thailand.  
 20 Q. So you know she went to Thailand?  
 21 A. I know she claimed she went to  
 22 Thailand from having read it but given that  
 23 she lied about everything it's hard to know  
 24 what is true and not true.  
 25 Q. Would it make any sense for her to

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 2 be in contact with you, would there be any  
 3 reason why she needed to be in contact with  
 4 you?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. When are we talking about?  
 8 Q. When she went to Thailand.  
 9 MR. PAGLIUCA: Same objection.  
 10 Q. In 2002, would there be any reason  
 11 for her to remain in contact with you?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. Can you ask the question again,  
 15 please?  
 16 Q. Would there be any reason for  
 17 Virginia to maintain contact with you in 2002  
 18 when she went to Thailand?  
 19 MR. PAGLIUCA: Same objection.  
 20 A. First of all, I didn't know that  
 21 she went to Thailand. I had had nothing to  
 22 do with her trip to go to Thailand and there  
 23 would absolutely no reason for her to be in  
 24 touch with me, whatsoever.  
 25 Q. Did you ever have a phone number

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 2 that was [REDACTED] ?  
 3 A. I did.  
 4 Q. Was that a cell phone number?  
 5 A. Yes.  
 6 Q. Is that your current cell phone  
 7 number?  
 8 A. Yes.  
 9 Q. I'm going to mark a couple of  
 10 things here?  
 11 (Maxwell Exhibit 11, photos, marked  
 12 for identification.)  
 13 THE WITNESS: Can I say something  
 14 now?  
 15 MR. PAGLIUCA: No.  
 16 THE WITNESS: Will you let me know  
 17 when I can?  
 18 MR. PAGLIUCA: When she asks you a  
 19 question:  
 20 Q. So we've marked this as Exhibit 11.  
 21 I'm showing you what's been marked as Exhibit  
 22 11 which is Giuffre 003191 and 003192.  
 23 Can you take a look at that  
 24 document for me. Is that number that you  
 25 just identified the [REDACTED] as being

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 2 your cell phone number, is that number on  
 3 this document?  
 4 A. It is.  
 5 Q. And do you know who authored this  
 6 document?  
 7 A. I do not.  
 8 Q. Who is JoJo?  
 9 A. I don't know who JoJo is on this  
 10 document because I don't know what this  
 11 document is.  
 12 Q. Do you know someone by the name of  
 13 JoJo?  
 14 A. I do know someone by the name of  
 15 JoJo.  
 16 Q. Would he know your phone number?  
 17 MR. PAGLIUCA: Object to the form.  
 18 A. I have to idea.  
 19 Q. Why would Virginia be instructed to  
 20 call Ms. Maxwell at your number on this form?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I don't know what this document is.  
 24 I don't know when it was done, I don't know  
 25 anything about it other than I can see it has

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 2 my name and my number on it.  
 3 Q. So JoJo -- you said JoJo -- is he  
 4 employed by Mr. Epstein?  
 5 A. Again, it is not the only one JoJo  
 6 on the planet.  
 7 Q. I understand.  
 8 Do you know a JoJo that is employed  
 9 by Mr. Epstein?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. Can you ask me the question again?  
 13 Q. Do you know someone by the name of  
 14 JoJo that was employed by Mr. Epstein back in  
 15 2002?  
 16 A. I do know somebody who was employed  
 17 by Mr. Epstein known as JoJo.  
 18 Q. Do you recognize the other numbers  
 19 listed at the top of this document?  
 20 A. I do not.  
 21 Q. Would you have known JoJo's cell  
 22 number at that time in 2002?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. I have no idea.

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 2 Q. Can I ask you to turn to the next  
 3 page, please.  
 4 Do you know who Nantimda Tharanese  
 5 is who is mentioned on this document?  
 6 A. I do not.  
 7 Q. If you look on the bottom lines of  
 8 the document, it says, Still in Thailand  
 9 during your stay, if she is, she will be  
 10 staying at the same hotel.  
 11 Do you recall ever giving Virginia  
 12 instructions to meet a girl in Thailand?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I have already testified that I  
 16 didn't even know that Virginia was going to  
 17 Thailand.  
 18 Q. So you didn't give her instructions  
 19 to meet a girl in Thailand?  
 20 A. Like I said, I didn't even know she  
 21 was going to Thailand.  
 22 Q. Do you know whether Jeffrey Epstein  
 23 would have given her instructions to meet a  
 24 girl in Thailand?  
 25 MR. PAGLIUCA: Objection to the

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 2 form and foundation.  
 3 A. I cannot possibly tell you what  
 4 Jeffrey did or didn't do. I wouldn't know.  
 5 Q. Do you know whether Jeffrey Epstein  
 6 paid for Virginia to go to Thailand?  
 7 A. Again, I wouldn't know if he did.  
 8 (Maxwell Exhibit 12, documents,  
 9 marked for identification)  
 10 Q. I'm going to direct -- you can take  
 11 a look at it and then I'm going to direct  
 12 your attention to a couple of pages.  
 13 MR. PAGLIUCA: So the record should  
 14 be clear, this exhibit which is 12 is  
 15 375, 6, 7, 8, 9, 80, 1, and then skips  
 16 to 919, 920, 921, 922, 923, 924, 925 and  
 17 926.  
 18 Q. So I'm going to direct your  
 19 attention to the first page, have you ever  
 20 traveled with Jeffrey Epstein where you've  
 21 received a document like this from Shoppers  
 22 Travel in your own independent travel.  
 23 Do you recognize this?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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 2 Q. The front form, the front page, do  
 3 you recognize this Shopper Travel form, have  
 4 you ever used them as a travel agent with  
 5 Jeffrey Epstein?  
 6 MR. PAGLIUCA: Same objection.  
 7 Q. You can answer.  
 8 A. I don't recognize this.  
 9 Q. Turning to the second page which is  
 10 the 00376, do you see at the top of that  
 11 document where it says Jeffrey Epstein, J.  
 12 Epstein 457 Madison Avenue 4th floor New York  
 13 New York.  
 14 Is that an address you are familiar  
 15 with that is Jeffrey Epstein's?  
 16 A. I am.  
 17 Q. Do you see below that, travel on  
 18 Singapore Airlines, and you are going to have  
 19 to go from New York JFK to Singapore Bangkok.  
 20 Do you see that?  
 21 MR. PAGLIUCA: What?  
 22 Q. The first entry is going to be on  
 23 September 27, New York.  
 24 MR. PAGLIUCA: I see it.  
 25 MS. McCAWLEY: I'm not talking to

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1 G Maxwell - Confidential  
 2 you. I'm talking to the witness.  
 3 A. I see it.  
 4 Q. To Singapore Bangkok?  
 5 A. Singapore Bangkok I'm afraid are  
 6 not the same place.  
 7 Q. Singapore, then Bangkok:  
 8 Q. I'm going to turn you to page  
 9 Giuffre, it's a little further back 000919.  
 10 And do you see at the top where it says J.  
 11 Epstein, underneath, Royal Princess, change  
 12 mine?  
 13 A. I do.  
 14 Q. Does this refresh your recollection  
 15 that Virginia Roberts' trip to Thailand was  
 16 paid for by Jeffrey Epstein?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I can only testify to the piece of  
 20 paper you showed me that has that  
 21 information. I cannot testify from direct  
 22 memory.  
 23 Q. When Virginia was traveling to  
 24 Thailand, which the dates, again, I'm going  
 25 to refer you back to the first page so you

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1 G Maxwell - Confidential  
 2 can see the dates.  
 3 MR. PAGLIUCA: Can you identify a  
 4 Bates number, please.  
 5 Q. [REDACTED] which was at the top says,  
 6 [REDACTED] I'm going to refer you,  
 7 at the same time, to the flight logs which  
 8 were marked, the thicker document that looks  
 9 like this with all the log entries on it.  
 10 I'm going to refer you to page --  
 11 MR. PAGLIUCA: That's Exhibit No.  
 12 6, correct? I'm trying to keep the  
 13 record straight.  
 14 MS. McCAWLEY: I don't have Exhibit  
 15 numbers on mine. That's Giuffre [REDACTED]  
 16 MR. PAGLIUCA: Hang on one second.  
 17 A. Can you repeat the number please.  
 18 Q. [REDACTED] And if you will look on  
 19 that page at the entry, under [REDACTED]  
 20 [REDACTED] starting with the [REDACTED] and then it runs  
 21 down to the, looks like the [REDACTED] that first  
 22 entry has President Clinton, Kevin Spacey,  
 23 Chris Tucker, Jeffrey Epstein and the  
 24 initials GM.  
 25 Do you remember taking a trip with

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1 G Maxwell - Confidential  
 2 President Clinton during [REDACTED]  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. Can you repeat the question,  
 6 please?  
 7 Q. Do you remember taking a trip with  
 8 President Clinton during [REDACTED]  
 9 that's the [REDACTED] it looks like, through the  
 10 [REDACTED]  
 11 A. I don't remember the dates. I  
 12 couldn't testify to when we actually did it  
 13 but I do remember the trip itself.  
 14 Q. So you were traveling with Jeffrey  
 15 Epstein and President Clinton at the same  
 16 time Virginia was headed to Thailand, is that  
 17 correct?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I don't know, is that right?  
 21 Q. If you look at [REDACTED] on the  
 22 document that I gave you, the first document  
 23 and then you referred to, if you look in the  
 24 same as above lines, you will see the travel  
 25 group with President Clinton?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Are you asking her  
 3 to compare the documents or are you  
 4 asking her what her personal knowledge  
 5 is.  
 6 MS. McCAWLEY: I'm asking if she can  
 7 look at the doubts and tell me if she  
 8 recalls that she traveling with  
 9 President Clinton at the same time this  
 10 document reflects Virginia was in  
 11 Thailand.  
 12 A. I can't testify to any dates. I  
 13 couldn't tell you. I can see a date and I  
 14 can see a date but I can't tell you that I  
 15 have a memory of the dates. I have a memory  
 16 of the trip, I don't have a memory of the  
 17 time.  
 18 Q. Who is [REDACTED]?  
 19 A. [REDACTED]  
 20 Q. What is her address?  
 21 A. I don't know.  
 22 Q. Does she live in the United States?  
 23 A. She does.  
 24 Q. In what state?  
 25 A. I believe in New Jersey somewhere.

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1 G Maxwell - Confidential  
 2 Q. Do you have her phone number?  
 3 A. Not memorized.  
 4 Q. Do you have the ability to get her  
 5 phone number?  
 6 A. Of course.  
 7 Q. Has she ever asked -- has [REDACTED]  
 8 [REDACTED] ever asked other girls to come over to  
 9 see Jeffrey Epstein for the purpose of a  
 10 sexual massage?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. Can you ask the question again  
 14 please.  
 15 Q. Has [REDACTED] ever asked girls to  
 16 come over to see Jeffrey Epstein for the  
 17 purpose of a sexual massage?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 A. Can you ask again, please?  
 21 Q. Has [REDACTED] ever asked girls to  
 22 come over to see Jeffrey Epstein for the  
 23 purpose of sexual massage?  
 24 A. I have no personal knowledge.  
 25 Q. What does [REDACTED] do for you?

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1 G Maxwell - Confidential  
 2 A. She helps with my not-for-profit  
 3 ocean foundation and any other related  
 4 activities that I may have.  
 5 Q. Is she paid for by Jeffrey Epstein?  
 6 A. No.  
 7 Q. She is paid for by you?  
 8 A. Yes.  
 9 Q. When did you first meet [REDACTED]  
 10 [REDACTED]  
 11 A. I don't recollect exactly, sometime  
 12 maybe 2002, 2003.  
 13 Q. How did you meet her?  
 14 A. I don't recollect exactly how we  
 15 met.  
 16 Q. Did Jeffrey introduce you to her?  
 17 A. I don't recollect how we met.  
 18 Q. Does she know Jeffrey Epstein?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. Can you ask again, please?  
 22 Q. Does [REDACTED] know Jeffrey  
 23 Epstein?  
 24 A. What do you mean by know?  
 25 Q. Has she met her him before?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I can't recollect a time when  
 5 [REDACTED] -- I've seen [REDACTED] with Jeffrey but --  
 6 Q. You are not sure --  
 7 A. I know they know either other. I  
 8 can't testify to a meeting between them.  
 9 Q. Do you know where in New Jersey she  
 10 lives?  
 11 A. No  
 12 Q. You don't know a city?  
 13 A. No.  
 14 Q. How long has she worked for you?  
 15 A. Sometime 2002, 2003.  
 16 Q. To the present?  
 17 A. Yeah.  
 18 Q. Why do you think that [REDACTED]  
 19 might know Jeffrey?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Because you know, I know Jeffrey.  
 23 Q. Have you seen them together?  
 24 A. I already testified I have not seen  
 25 them together, to my recollection.

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1 G Maxwell - Confidential  
 2 Q. Is it your testimony that [REDACTED]  
 3 [REDACTED] knows Jeffrey Epstein through the work  
 4 that she does for you?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I don't recollect, and I don't  
 8 recollect how I met [REDACTED] and I can't testify  
 9 to what [REDACTED] relationship is or is not with  
 10 Jeffrey.  
 11 Q. Have you ever talked to Jeffrey  
 12 about [REDACTED]  
 13 A. I don't know what you mean.  
 14 Q. In any way, have you ever had a  
 15 conversation with Jeffrey about [REDACTED]  
 16 A. In what context.  
 17 Q. In any context. Have you ever  
 18 talked to Jeffrey Epstein about [REDACTED]?  
 19 A. [REDACTED] works for me so it's entirely  
 20 possible that in the course of conversations  
 21 since 2002, 2003 that a conversation in which  
 22 [REDACTED] name would have come up is entirely  
 23 possible.  
 24 Q. I provided you with and I'm sorry,  
 25 I don't know all the numbers, but the

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 2 statement that was issued by Ross Gow that  
 3 should be a single page still in your stack  
 4 of exhibits there.  
 5 MR. PAGLIUCA: Exhibit 10.  
 6 Q. Did you authorize Ross Gow to issue  
 7 that statement on your behalf in January of  
 8 2015?  
 9 A. I already testified that that was  
 10 done by my lawyers.  
 11 Q. So did you authorize your lawyers  
 12 to issue a statement on your behalf through  
 13 Ross Gow in January of 2015?  
 14 A. It was determined that I had to  
 15 make a statement in the United Kingdom  
 16 because of the appalling lies and I just  
 17 thought of some new ones.  
 18 Virginia's statement that I  
 19 celebrated her 16 birthday with her. We can  
 20 all agree that that's entirely impossible. I  
 21 didn't meet her until she was 17 and other  
 22 lies she perpetrated that she had a diary and  
 23 we all know is a complete fake. That's not a  
 24 diary. It was just a book she was writing  
 25 that you helped sell to the press, as if it



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1 G Maxwell - Confidential  
 2 was a diary, when it was just a story that  
 3 she is writing of fiction, fictional story  
 4 for money.  
 5 Q. How did you arrive at the words  
 6 that were put in that statement?  
 7 MR. PAGLIUCA: I'm going to object  
 8 and instruct you to the extent this  
 9 calls for any privileged communications  
 10 between yourself and Mr. Barden or  
 11 another lawyer representing you, we're  
 12 asserting privilege. If you can answer  
 13 that without that, feel free to answer.  
 14 Q. So what your counsel is saying, and  
 15 I will exclude any privileged communications  
 16 you had with your lawyers.  
 17 The question is, how did you arrive  
 18 at the words that were put in that statement,  
 19 if you can tell me without disclosing  
 20 privileged communications?  
 21 A. I'm not sure that I can.  
 22 Q. Is the statement that you issued  
 23 true?  
 24 A. What do you mean by that?  
 25 Q. Is the statement that you issued,

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1 G Maxwell - Confidential  
 2 the statement that's in front of you, is it a  
 3 true statement?  
 4 A. As in that Virginia is a liar?  
 5 Q. The words you put in there, is that  
 6 true?  
 7 A. Of course they're true.  
 8 Q. When did you become aware that the  
 9 statement was being released?  
 10 A. I don't recollect exactly.  
 11 Q. What day it was?  
 12 A. No.  
 13 Q. I'm sorry. Did you identify, I  
 14 might not have caught it, did you identify  
 15 the name of the lawyer that you said you  
 16 retained for purposes of this statement?  
 17 A. I think Philip Barden.  
 18 Q. Did you pay that lawyer Philip  
 19 Barden?  
 20 A. Yes.  
 21 Q. Are you aware of any interstate or  
 22 international transportation of a woman aged  
 23 18 to 28 for the purposes of prostitution?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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 2 A. I'm not sure I even understand your  
 3 question.  
 4 Q. I will go slower.  
 5 Are you aware of any interstate,  
 6 meaning between states, or international,  
 7 meaning oversees transportation, of women  
 8 aged 18 to 28, for the purposes of  
 9 prostitution?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. Are you asking -- I'm still not  
 13 sure I understand the question.  
 14 Q. I will try to make it clearer.  
 15 I'm asking you if you are aware of  
 16 any interstate, meaning between states, or  
 17 international transportation, meaning by  
 18 flight or by car or by train, of women aged  
 19 18 to 28, their ages are between the ages of  
 20 18 and 28, for the purposes of prostitution?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. In the world I'm sure that that  
 24 happens, I read about it all the time.  
 25 Q. Not in the world. Are you aware of

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1 G Maxwell - Confidential  
 2 it, in your experience with Jeffrey Epstein,  
 3 of any interstate or international  
 4 transportation of women aged 18 to 28, for  
 5 the purposes of prostitution?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. So whilst I appreciate this might  
 9 not seem like a smart question, what do you  
 10 mean by prostitution, what are you asking me  
 11 exactly?  
 12 Q. That would be sex for hire, any  
 13 kind of sexual act that's paid for.  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 A. Who's paying, what are you asking  
 17 me.  
 18 Q. It can be paid for by anybody.  
 19 It's a sexual act that's paid for.  
 20 I'm asking if you are aware of any  
 21 interstate or international transportation of  
 22 women aged 18 to 28, for the purposes of  
 23 prostitution?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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 2 A. I have no idea what you are talking  
 3 about.  
 4 Q. So you are not aware of that?  
 5 A. No.  
 6 Q. Are you aware of any interstate or  
 7 international transportation of women, aged  
 8 18 to 28, for the purposes of having sex with  
 9 Epstein where they would receive compensation  
 10 of any type?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I don't know what you are referring  
 14 to.  
 15 Q. Do you want me to repeat the  
 16 question?  
 17 A. Sure, go ahead.  
 18 Q. Are you aware of any interstate or  
 19 international transportation of woman, aged  
 20 18 to 28, for the purpose of having sex with  
 21 Jeffrey Epstein where they would receive  
 22 compensation of any type?  
 23 MR. PAGLIUCA: Objection to form  
 24 and foundation.  
 25 A. I am not aware of what you are

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 2 talking about.  
 3 Q. Are you aware of any interstate or  
 4 international transportation of women, aged  
 5 18 to 28, for the purposes of providing a  
 6 massage for Jeffrey Epstein?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. So I you need to repeat that  
 10 question for me.  
 11 Q. Sure.  
 12 Are you aware of any interstate,  
 13 meaning between states, or international,  
 14 oversees, transportation of women, aged 18 to  
 15 28, for the purposes of providing massage for  
 16 Jeffrey Epstein?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I think we can agree he did travel  
 20 from time to time with a professional adult  
 21 masseuse.  
 22 Q. Are you aware of any interstate or  
 23 international transportation of women, aged  
 24 18 to 28, for the purposes of providing a  
 25 massage to any person other than Jeffrey

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 2 Epstein?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. Again, I'm not aware of anybody  
 6 that, if you are asking for specifics to  
 7 someone else, I have no knowledge of that.  
 8 Q. So you are not aware of any  
 9 interstate or international transportation of  
 10 a woman aged 18 to 28 for the purposes of  
 11 providing a massage to any person other than  
 12 Jeffrey Epstein?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I don't recall what any single  
 16 person being on a plane for a massage with  
 17 someone else other than Jeffrey, for the sole  
 18 purpose, if that's the question, I don't have  
 19 any recollection of that.  
 20 Q. Earlier in your testimony, you  
 21 stated that Virginia Roberts was 17 at the  
 22 time you met her.  
 23 How do you know she was 17?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation. And to the extent

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1 G Maxwell - Confidential  
 2 that calls for a privileged response,  
 3 I'm instructing you not to answer.  
 4 Q. How do you know Virginia Roberts  
 5 was 17 at the time you met her?  
 6 MR. PAGLIUCA: Again, if you  
 7 learned that information from your  
 8 lawyer, I'm instructing you not to  
 9 answer.  
 10 A. I will follow my counsel's advice.  
 11 Q. Are you able to answer that  
 12 question without telling me information you  
 13 learned from a lawyer?  
 14 A. I'm not.  
 15 Q. So you don't have independent  
 16 knowledge that Virginia, according to your  
 17 statement, was 17 at the time you met her?  
 18 A. Again, my lawyer has instructed me  
 19 not to answer.  
 20 Q. I'm asking you a different  
 21 question. Whether you have any independent  
 22 knowledge, outside your lawyers, that  
 23 Virginia was 17 at the time you met her?  
 24 A. Following the instructions of my  
 25 lawyers, I can only remember or testify to

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1 G Maxwell - Confidential  
 2 what she --  
 3 MR. PAGLIUCA: She is asking you a  
 4 different question. She is asking other  
 5 than what your lawyers have told you, do  
 6 you have any knowledge about her being  
 7 17, that's what she is asking.  
 8 A. I can't recollect where I got all  
 9 the information that I have that definitively  
 10 shows that.  
 11 Q. Earlier in your testimony, I  
 12 believe you said all of us would know that  
 13 Virginia was 17 at the time you met her.  
 14 How would we know that?  
 15 A. I think you know that by her own  
 16 dates, now that it was in 2000, so her entire  
 17 tail of me celebrating her 16th birthday is  
 18 clearly another giant falsehood.  
 19 Q. But she was 16 and 17 that year,  
 20 wasn't she?  
 21 A. Which year?  
 22 Q. You said it was 2000.  
 23 A. I think the information that I have  
 24 that indicates that definitively was  
 25 something that is privileged, so I can't

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1 G Maxwell - Confidential  
 2 share with you.  
 3 Q. So you have privileged information  
 4 that definitively tells you that she was 17  
 5 at the time you met her?  
 6 A. I believe I do.  
 7 Q. How would we know that?  
 8 A. What are you asking me?  
 9 Q. Earlier today you testified that we  
 10 would know that she was 17 at the time that  
 11 you met her.  
 12 How would we know that?  
 13 A. I imagine you have access to  
 14 exactly the same information that I do.  
 15 Q. What is that information?  
 16 A. Again, it's privileged, I can't  
 17 share it with you but you have been on this  
 18 case for, I don't know, much much longer than  
 19 I have and I imagine you have all the  
 20 information that I do.  
 21 Q. Do you know whether your lawyers  
 22 have produced documents from you that would  
 23 show the age that Virginia was at the time  
 24 that you met her?  
 25 MR. PAGLIUCA: To the extent that

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1 G Maxwell - Confidential  
 2 calls for a communication that you had  
 3 with one of your lawyers, I'm  
 4 instructing you not to answer that  
 5 question.  
 6 Q. I assume you, as part of the  
 7 discovery process, had to collect documents  
 8 that were relevant to this action, is that  
 9 correct?  
 10 A. I did.  
 11 Q. Did you collect documents that  
 12 would show that Virginia was 17 at the time  
 13 that you met her?  
 14 A. I think you have everything that  
 15 relates, that I had, contemporaneously per  
 16 what you asked for that I have that relates  
 17 to that.  
 18 Q. Did you have a document that  
 19 identified that Virginia was 17 at the time  
 20 that you met her?  
 21 A. You have all of the documents that  
 22 I had.  
 23 Q. I'm not asking what documents. I'm  
 24 asking, do you have a document that  
 25 identifies Virginia being 17 at the time you

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1 G Maxwell - Confidential  
 2 met her?  
 3 A. You have every document that I  
 4 have. You have seen every document that I  
 5 have.  
 6 Q. That's not what I'm asking.  
 7 A. I don't recall every document that  
 8 I gave you, so I don't know. I would have to  
 9 look at every single document I gave you and  
 10 then review it but as I recall you have every  
 11 document that I have.  
 12 Q. What are you planning to show the  
 13 jury that will prove that Virginia was 17  
 14 when you met her?  
 15 A. Again that's privileged so I can't  
 16 share that with you.  
 17 Q. If you're showing the jury, it  
 18 wouldn't be privileged, so is there a  
 19 document you have produced in this matter  
 20 that shows that Virginia was 17 at the time  
 21 you met her?  
 22 MR. PAGLIUCA: She answered that  
 23 question already. She said she doesn't  
 24 know, she has given you everything. If  
 25 there is a decision -- assuming for the

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 2 moment there is such a document, just  
 3 hypothetically, and assuming for the  
 4 moment that it is going to get produced  
 5 somewhere, if it hasn't already been  
 6 produced, obviously that would involve a  
 7 waiver, a future waiver of the  
 8 privilege. I think that's the answer to  
 9 the question.  
 10 Q. Has the document been produced, do  
 11 you know?  
 12 A. You have everything that I have  
 13 given you, so if you can't -- if it's not in  
 14 those documents, I don't know what to tell  
 15 you.  
 16 Q. Your lawyers haven't withheld any  
 17 documents?  
 18 A. They are right here. You can ask  
 19 them.  
 20 Q. I'm asking you.  
 21 A. I don't know what -- they're  
 22 lawyers.  
 23 Q. When we were talking earlier about  
 24 Prince Andrew, I asked you whether you had  
 25 ever given him a gift of a puppet.

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1 G Maxwell - Confidential  
 2 Did you ever, not as a gift, did  
 3 you ever see in the presence of Prince Andrew  
 4 a puppet?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. Can you be more direct, please?  
 8 Q. Sure. Were you ever in a room with  
 9 Prince Andrew where there was a puppet?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. Can you be more specific please and  
 13 can you bound it by time and be more  
 14 specific, whatever you are actually asking  
 15 me?  
 16 Q. Were you ever in a room with Prince  
 17 Andrew in New York in Jeffrey Epstein's home  
 18 where there was a puppet?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. What sort of puppet are you asking  
 22 me?  
 23 Q. Any kind of puppet?  
 24 A. You need to be more descriptive. I  
 25 don't know what you mean by puppet, there is

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1 G Maxwell - Confidential  
 2 hand puppets, all sorts of puppets.  
 3 Q. Is there any puppet you've ever  
 4 seen in Jeffrey Epstein's home in the  
 5 presence of Prince Andrew?  
 6 A. Again, puppet, you know, there is  
 7 lots of types of puppets.  
 8 Q. Any type of puppet.  
 9 A. If you want to give me a  
 10 description of the puppet, I would be perhaps  
 11 be able to say.  
 12 Q. Any type of puppet?  
 13 A. Can you be more detailed?  
 14 Q. Have you ever seen a puppet in  
 15 Jeffrey Epstein's home in the presence of  
 16 Prince Andrew?  
 17 A. My understanding of a puppet is a  
 18 small handheld item you have in a circus. I  
 19 have never seen that.  
 20 Q. Have you ever seen a puppet which  
 21 is defined as a movable model of a person or  
 22 animal that is used in entertainment and  
 23 typically moved either by strings or  
 24 controlled from above or by a hand inside it?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I have not seen a puppet that fits  
 4 exactly that description.  
 5 Q. Have you seen any puppet that fits  
 6 any description?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. Can you reask the question, please?  
 10 Q. Yes.  
 11 Have you seen any puppet that fits  
 12 any description in the presence of Prince  
 13 Andrew in Jeffrey Epstein's home?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 A. I am not aware of any small  
 17 handheld puppet that was there. There was a  
 18 puppet -- not a puppet -- there was a -- I  
 19 don't know how would you describe it really,  
 20 I don't know how would you describe it. Not  
 21 a puppet, I don't know how you would describe  
 22 it. A caricature of Prince Andrew that was  
 23 in Jeffrey's home.  
 24 Q. Did you use that caricature to put  
 25 the hand of the caricature on Johanna

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1 G Maxwell - Confidential  
 2 Sjoberg's breast?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. I don't recollect. I recollect the  
 6 puppet but I don't recollect anything around  
 7 the puppet. You characterized puppet, I  
 8 characterize it as, I don't know, as a  
 9 characterization of Andrew.  
 10 Q. Do you recollect asking Virginia  
 11 Roberts to sit on Prince Andrew's lap with  
 12 the caricature of Prince Andrew?  
 13 A. I do not recollect that.  
 14 Q. What do you remember about the  
 15 caricature of the Prince Andrew caricature  
 16 when you were in the presence of Prince  
 17 Andrew, Virginia Roberts and Johanna Sjoberg?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I don't recollect the story as told  
 21 by Johanna or Virginia. I don't even know  
 22 who -- I remember the caricature of Prince  
 23 Andrew and I remember Prince Andrew but I  
 24 don't recall anything else around the  
 25 caricature.

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1 G Maxwell - Confidential  
 2 Q. Did you give it to him?  
 3 A. I did not.  
 4 Q. Who gave it to him?  
 5 A. I don't think it was given to him  
 6 at all.  
 7 Q. Did he bring it?  
 8 A. No.  
 9 Q. Was it something that was at the  
 10 house?  
 11 A. As best I recollect.  
 12 Q. Was it something that you saw at  
 13 the house in advance of Prince Andrew's  
 14 arrival?  
 15 A. Again, I don't real -- I recollect  
 16 the caricature, I recollect Prince Andrew, I  
 17 don't recollect much else around the  
 18 caricature.  
 19 Q. Was there a party going on in the  
 20 house at the time you recollect the  
 21 caricature?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. You have to be way more specific?  
 25 Q. Do you remember, you said you

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1 G Maxwell - Confidential  
 2 recollect this caricature, you recollect  
 3 Prince Andrew being there. Do you recollect  
 4 a party going on at the time of that  
 5 interaction with Prince Andrew and the  
 6 caricature?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I don't recollect a party -- first  
 10 of all, they weren't really parties -- I  
 11 don't recollect a party -- I don't know what  
 12 you mean by party in the context of that  
 13 scenario.  
 14 Q. Who do you recollect being at the  
 15 home during the time Prince Andrew was there  
 16 with this caricature?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I only recollect myself with Prince  
 20 Andrew, I don't recollect anybody else.  
 21 Q. You don't recollect Jeffrey Epstein  
 22 being there?  
 23 A. Actually, no.  
 24 Q. You don't recollect Johanna Sjoberg  
 25 being there?

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1 G Maxwell - Confidential  
 2 A. No.  
 3 Q. You don't recollect Virginia  
 4 Roberts being there?  
 5 A. No.  
 6 Q. It was just you and Prince Andrew?  
 7 A. I am not saying it was just me and  
 8 Prince Andrew, you are asking me do you  
 9 remember. I only remember Prince Andrew, I  
 10 remember Prince Andrew and the caricature but  
 11 I can't place the caricature and everybody  
 12 else in the same context, the same timeframe  
 13 you are asking me.  
 14 Q. Would Prince Andrew typically  
 15 travel with Secret Service or some sort of  
 16 security when he would come to visit you and  
 17 Jeffrey in New York?  
 18 A. Typically he would have somebody.  
 19 Q. Would they be in the house or  
 20 outside of the house? Would they usually  
 21 stay in the house or outside of the house, in  
 22 other words guarding the doors or would they  
 23 come inside?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. Typically, there is no typical  
 3 because there is no standard procedure, so I  
 4 can't comment or testify to what secret  
 5 service would or wouldn't do.  
 6 Q. Do you remember them being in the  
 7 house?  
 8 A. Not specifically.  
 9 Do you mind if I take a bathroom  
 10 break.  
 11 THE VIDEOGRAPHER: It's now 3:51  
 12 and we are off the record.  
 13 (Recess.)  
 14 THE VIDEOGRAPHER: It's now 4:04.  
 15 We are back on the record and we're  
 16 starting disk No. 7.  
 17 Q. Ms. Maxwell, during what time  
 18 period, I know you said, I believe you said  
 19 you met Jeffrey in 1991, if I'm correct there  
 20 and you've known him through the present.  
 21 During what time period within  
 22 those years would you say your relationship  
 23 was the closest with Jeffrey?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. What do you mean by close, sorry.  
 3 Q. I think earlier today you testified  
 4 that at some point in time you considered  
 5 yourself to be his girlfriend, is that the  
 6 closest you would say that your relationship  
 7 was with him and if so, what time period was  
 8 that?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I don't think I said I was his  
 12 girlfriend, I would like to think of myself  
 13 as maybe, I don't think I -- sometime in the  
 14 mid '90s.  
 15 Q. How close was your relationship?  
 16 A. We were very friendly.  
 17 Q. Without going into details, was  
 18 your relationship with him intimate?  
 19 A. Yes.  
 20 Q. When was the last time you had  
 21 contact with Jeffrey Epstein?  
 22 A. What do you mean by contact.  
 23 Q. Either a phone call or email or  
 24 anything of that nature?  
 25 A. As best as I can recollect when

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1 G Maxwell - Confidential  
 2 all -- sometime last year.  
 3 Q. So you haven't talked to him like,  
 4 for example, last week you didn't talk to  
 5 him?  
 6 A. I did not.  
 7 Q. How many times have you had either  
 8 direct or indirect, meaning, in the presence  
 9 of him or calling or emailing, contact with  
 10 Jeffrey Epstein from December 30, 2014 until  
 11 now?  
 12 A. I'm sorry, can you just --  
 13 Q. Either in person or by phone or by  
 14 email, from December 30, 2014 until present.  
 15 A. I can't really characterize that  
 16 but not very much. There was a period when  
 17 in January when you filed your, whatever you  
 18 filed, where we spoke and then, since then  
 19 not much at all.  
 20 Q. Can you estimate how many emails  
 21 you would have sent Jeffrey from the period  
 22 of December 30, 2014 to the present?  
 23 A. Not very many at all.  
 24 Q. More than 20?  
 25 A. I really wouldn't be able to

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1 G Maxwell - Confidential  
 2 characterize it because it wouldn't be that  
 3 many. I wouldn't know.  
 4 Q. More than 50?  
 5 A. It would be on the lesser side, not  
 6 on the more side.  
 7 Q. Can you give me a number?  
 8 A. I honestly couldn't. I would be  
 9 guessing.  
 10 Q. How many emails has Jeffrey sent  
 11 you from the period December 30, 2014 to the  
 12 present?  
 13 A. I would say less emails, even less  
 14 emails than I sent him.  
 15 Q. More than 20?  
 16 A. I would say on the lesser side.  
 17 Q. Less meaning 10?  
 18 A. I really can't recall, very little.  
 19 Q. When you spoke with Jeffrey in  
 20 January of 2015, what did he say to you?  
 21 A. I really couldn't remember exactly  
 22 what he said to me.  
 23 Q. Did you talk about Virginia  
 24 Roberts?  
 25 A. I'm sure we did but I couldn't

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1 G Maxwell - Confidential  
 2 recall the exact conversation.  
 3 Q. Does Jeffrey Epstein send you text  
 4 messages?  
 5 A. No.  
 6 Q. Do you send him text messages?  
 7 A. No.  
 8 Q. How many phone calls have you had  
 9 with Jeffrey Epstein since December 30, 2014?  
 10 A. Again, very few.  
 11 Q. More than five?  
 12 A. Probably as many as the few emails  
 13 that I would characterize, so just very few.  
 14 I mean a small number.  
 15 Q. Are you aware of any disagreement  
 16 between your views about Virginia Roberts and  
 17 Jeffrey's views about Virginia Roberts?  
 18 MR. PAGLIUCA: Object to the form  
 19 and foundation  
 20 A. I cannot speculate to his views. I  
 21 can only testify on my views.  
 22 Q. Earlier you went through the series  
 23 of lies. Have you talked to Jeffrey about  
 24 the lies and does he agree with you?  
 25 A. I have discussed some of the issues

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1 G Maxwell - Confidential  
 2 with him, I can't remember specifically which  
 3 ones. I just don't recall. I'm sorry.  
 4 Q. Do you recall him telling you that  
 5 he didn't agree with you on any of those?  
 6 A. I don't recall him saying that.  
 7 Q. Do you have a joint defense  
 8 agreement with Jeffrey Epstein?  
 9 A. I believe I do.  
 10 Q. Do you have a joint defense  
 11 agreement with Alan Dershowitz?  
 12 A. I don't believe I do.  
 13 Q. Earlier today in your testimony,  
 14 when I was asking you some questions, you  
 15 said that you couldn't answer but that  
 16 Jeffrey Epstein could answer that question.  
 17 Would Jeffrey Epstein be in a  
 18 position to confirm or deny some of the  
 19 obvious lies that we've discussed today?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I can't possibly testify to what  
 23 Jeffrey could or would say. I can't speak  
 24 for him.  
 25 Q. Would Jeffrey be able to confirm or

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1 G Maxwell - Confidential  
 2 deny whether he had sex with Virginia  
 3 Roberts?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I can't say what Jeffrey would say.  
 7 Q. Has he discussed that with you?  
 8 A. He has not.  
 9 Q. Would Jeffrey be able to confirm or  
 10 deny whether he had a sexual massage from  
 11 Virginia that first time she came to his  
 12 mansion in Palm Beach?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I cannot speak for what he would  
 16 say. I can only speak for what I would say.  
 17 So as I testified everything that she said  
 18 about that first meeting didn't happen so...  
 19 Q. Has he told that you everything  
 20 about that first meeting didn't happen?  
 21 A. I know it didn't happen because she  
 22 put me in that room.  
 23 Q. I understand you know. But has  
 24 Jeffrey said when you are talking about the  
 25 obvious lies, oh yeah, that never happened?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I can't specifically recall that.  
 5 I don't know, but he has to agree with me  
 6 because it didn't happen.  
 7 Q. Can Jeffrey Epstein, would he be  
 8 able to confirm or deny whether he had sex  
 9 with underage girls?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I can't testify to what Jeffrey  
 13 would say.  
 14 Q. Can Jeffrey confirm or deny whether  
 15 Bill Clinton was on Jeffrey's island?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. I can't say what Jeffrey would say.  
 19 I can only say what I know to be true.  
 20 Q. Has Jeffrey talked to you about the  
 21 fact whether Bill Clinton was on his island?  
 22 A. As best as I can recollect, he said  
 23 he was not on the island. As best as I can  
 24 recollect.  
 25 Q. Can Jeffrey Epstein confirm whether

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1 G Maxwell - Confidential  
 2 he and Virginia Roberts were together in the  
 3 presence of Prince Andrew?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I can't speak to what Jeffrey would  
 7 say.  
 8 Q. Has he talked to about Virginia  
 9 Roberts' statement that she was in the  
 10 presence of Prince Andrew?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I have not discussed individual  
 14 presences with Virginia. That's not -- I'm  
 15 only concerned with what I know to be the  
 16 stuff about me. So my focus has always been  
 17 the lies and the obvious lies as something I  
 18 can personally attest to. I cannot possibly  
 19 talk for anything else.  
 20 Q. Has Jeffrey Epstein said to you  
 21 anything along the lines of Virginia is lying  
 22 when she says she met Prince Andrew?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Again, I'm not talking about what

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1 G Maxwell - Confidential  
 2 she says as regards to other people. I can  
 3 talk to things as regards to me.  
 4 Q. I'm asking if Jeffrey ever said  
 5 that to you?  
 6 A. I don't recollect specific  
 7 conversations along those things.  
 8 Q. You don't recollect him saying that  
 9 to you?  
 10 A. I don't recollect him saying to me  
 11 that Virginia didn't meet Prince Andrew. I'm  
 12 sure that wouldn't be a conversation that we  
 13 would have. It doesn't effect me whether --  
 14 so I'm really only concerned about the lies  
 15 that were told as regards to me.  
 16 Q. Can Jeffrey Epstein confirm or deny  
 17 whether you sent Virginia to give Glenn Dubin  
 18 a massage?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I can't say what Jeffrey would say,  
 22 I can tell you I didn't. I can't tell you  
 23 what anybody else.  
 24 Q. Have you discussed with him  
 25 Virginia's allegation that she gave Glenn

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1 G Maxwell - Confidential  
 2 Dubin a massage?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. I didn't know that she did say  
 6 that.  
 7 Q. Do you know whether Jeffrey Epstein  
 8 has ever sent anybody to Glenn Dubin to  
 9 perform a massage for him?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I couldn't possibly recollect  
 13 whether he did anything like that.  
 14 Q. Did you ever send anybody, not  
 15 Virginia, anybody else over to Glenn Dubin's  
 16 home for a massage?  
 17 A. Not to the best of my knowledge.  
 18 Q. Do you know one of Alexander  
 19 Dixon's friend by the name of Anuska  
 20 DiGeorgio?  
 21 A. I do recollect a person of that  
 22 name.  
 23 Q. How do you know her?  
 24 A. I don't recollect.  
 25 Q. Did you meet her through Jeffrey?

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1 G Maxwell - Confidential  
 2 A. I don't recollect.  
 3 Q. Do you recall when you met her?  
 4 A. I do not recollect.  
 5 Q. How many times have you seen Anuska  
 6 DiGeorgio in your life?  
 7 A. The only reason I remember is  
 8 because it's an unusual name but I couldn't  
 9 tell you anything else.  
 10 Q. You didn't see her on a regular  
 11 basis, she wasn't one of your friends?  
 12 A. No.  
 13 Q. Was Anuska DiGeorgio a masseuse?  
 14 A. Not to my knowledge.  
 15 Q. Do you have knowledge of whether  
 16 she had a sexual relationship with Jeffrey  
 17 Epstein?  
 18 A. I have no knowledge of that.  
 19 Q. When was the last time you spoke  
 20 with her?  
 21 A. A very long -- I have no idea.  
 22 Q. Would it be years?  
 23 A. Yes.  
 24 Q. What do you remember about Anuska  
 25 DiGeorgio?



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1 G Maxwell - Confidential  
 2 A. Nothing really.  
 3 Q. Do you remember what she looks  
 4 like?  
 5 A. I would just be speculating on how  
 6 I remember. I couldn't describe her.  
 7 Q. Do you recall traveling with her?  
 8 A. I don't.  
 9 Q. Did you ever go to her home?  
 10 A. I don't believe I did.  
 11 Q. Do you know where she lives?  
 12 A. I don't.  
 13 Q. Would you have met her through  
 14 Jeffrey Epstein?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I already testified I don't  
 18 recollect how I met her and I remember her  
 19 because her name is very unusual.  
 20 Q. So what's your -- what recollection  
 21 do you have of her, do you have a specific  
 22 recollection of meeting her somewhere, you  
 23 just don't know when that was or how do you  
 24 know that name Anuska DiGeorgio?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I don't know why the name is -- I'm  
 4 sorry -- I can't -- I have no idea. I  
 5 recognize the name but that's it.  
 6 Q. Was Johanna Sjoberg a masseuse?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. What are you asking me, I'm sorry?  
 10 Q. When Johanna Sjoberg worked for  
 11 Jeffrey Epstein, did she perform massages?  
 12 A. I've testified that when Johanna  
 13 came originally, she came to answer  
 14 telephones. I believe at some point she  
 15 became a masseuse. I don't recollect when  
 16 and I personally had massages from Johanna.  
 17 Q. What did Johanna do for Jeffrey  
 18 Epstein, did she perform massages, anything  
 19 else?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. When she came she answered phones  
 23 and at some point, I believe, I don't have  
 24 any firm recollection, but I believe she went  
 25 to school and became a masseuse and I had

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1 G Maxwell - Confidential  
 2 massages from her.  
 3 Q. Did you ever have any sexual  
 4 interaction with her?  
 5 MR. PAGLIUCA: Object to the form  
 6 and foundation and I'm going to instruct  
 7 you if we're talking about any  
 8 consensual adult contact, you are not  
 9 allowed to answer the question.  
 10 Q. Did you have any sexual contact  
 11 with her in the presence of Jeffrey Epstein?  
 12 MR. PAGLIUCA: Same instruction.  
 13 Q. Did you have any sexual contact  
 14 with her in the presence of anybody other  
 15 than Jeffrey Epstein?  
 16 MR. PAGLIUCA: Same instruction.  
 17 Q. How many massages did you receive  
 18 from Johanna?  
 19 A. I really don't recall but a fair  
 20 amount.  
 21 Q. Did the massages involve sex?  
 22 MR. PAGLIUCA: I'm going to  
 23 instruct you not to answer.  
 24 Q. Have you ever engaged in sex with  
 25 any female?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: I'm going to  
 3 instruct you not to answer.  
 4 MS. McCRAWLEY: I want the record to  
 5 reflect that Ms. Maxwell's attorney is  
 6 directing her not to answer this series  
 7 of questions.  
 8 MR. PAGLIUCA: It definitely does.  
 9 Q. Were you responsible for  
 10 introducing Anuska to Jeffrey Epstein?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I already testified that I don't  
 14 really recall Anuska.  
 15 Q. Were you responsible for  
 16 introducing Johanna to Jeffrey Epstein?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. Again, I don't like the  
 20 characterization of introduction. Johanna  
 21 came to answer telephones.  
 22 Q. When did you -- were you the person  
 23 who brought or introduced or met Johanna for  
 24 purposes of bringing her to Jeffrey Epstein's  
 25 home?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. That's not how I would characterize  
 5 that.  
 6 Q. How would you characterize it?  
 7 A. I have testified that I'm  
 8 responsible for finding professional people  
 9 to work in the homes, age appropriate adult  
 10 people, so from pool attendants, to  
 11 gardeners, to chefs, to housekeepers, to  
 12 butlers, to chauffeurs and one of the  
 13 functions was to be able to answer the  
 14 telephones and in the context of finding  
 15 someone to answer the telephones, I did look  
 16 to try to find appropriate people to answer  
 17 the phones.  
 18 Q. So did you find Johanna for  
 19 purposes of that role?  
 20 A. So in the course of looking for  
 21 somebody to answer phones at the house,  
 22 Johanna was one of the people who said that  
 23 she was willing to answer phones.  
 24 Q. Did you approach her at her school  
 25 campus?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to form  
 3 and foundation.  
 4 A. I honestly don't recall how, in  
 5 that moment, how I met Johanna and how she  
 6 came to get the job but...  
 7 Q. Did you typically, in your work for  
 8 Jeffrey Epstein, would you typically go to  
 9 school campuses to try to find individuals to  
 10 work for Jeffrey Epstein?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I never -- what do you mean by  
 14 school? Let's characterize school.  
 15 Q. Any kind of school.  
 16 A. Obviously not. I never went to any  
 17 school with young people. Johanna, I believe  
 18 came from an adult university, as I would  
 19 know in England, so university, I went there  
 20 but I never went, as I best recollect,  
 21 anywhere else.  
 22 Q. Did you -- what university was it  
 23 that you went to?  
 24 A. I don't recall the university that  
 25 she went to right now.

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1 G Maxwell - Confidential  
 2 Q. Would you visit more than one  
 3 university to try to find individuals to work  
 4 for Jeffrey Epstein?  
 5 A. As I recollect, I think that's, in  
 6 fact, the only university I went to.  
 7 Q. Did you go there more than once?  
 8 A. I think I went twice.  
 9 Q. Who else did you find from that  
 10 university, was there anybody other than  
 11 Johanna?  
 12 A. I don't recollect, I'm sorry.  
 13 Q. We are going to mark this as  
 14 Maxwell 13?  
 15 (Maxwell Exhibit 13, documents,  
 16 marked for identification.)  
 17 Q. Can you take a look at the document  
 18 I put in front of you, please.  
 19 Are you familiar with this  
 20 document?  
 21 A. I'm familiar with this actual  
 22 document.  
 23 Q. How was this document created?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. I don't know how this document was  
 3 created.  
 4 Q. You were involved in the creation  
 5 of this document?  
 6 A. I think you can see from the date  
 7 that it's 2004, 2005, so no.  
 8 Q. You weren't involved in the  
 9 creation of this document.  
 10 Did you -- we talked earlier about  
 11 Mr. Epstein's house, I'm talking about the  
 12 Palm Beach house where you said there was a  
 13 computer on the desk, that employees had  
 14 access to -- people who worked for Jeffrey  
 15 Epstein may have had access to?  
 16 A. I think anybody could have had  
 17 access to that.  
 18 Q. Was that computer used, if you know  
 19 to keep a log of addresses and phone contact  
 20 information for Jeffrey Epstein?  
 21 A. Are we talking about when this  
 22 document was created.  
 23 Q. In general, was there, on that  
 24 computer during the time that you were  
 25 present with Jeffrey Epstein, was there a

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1 G Maxwell - Confidential  
 2 mechanism by which you kept electronic  
 3 information of names and addresses of  
 4 individuals that he knew?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I can't testify to what was on that  
 8 computer or not after I was gone.  
 9 Q. Not when you were gone, when you  
 10 were there. If Jeffrey wanted to call, for  
 11 example, say Les Wexner, would someone be  
 12 able to go to that computer to pull up the  
 13 address information and phone contact  
 14 information for that individual?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I couldn't possibly say.  
 18 Q. Did you ever have to keep track of  
 19 address or phone contact information for  
 20 Jeffrey Epstein?  
 21 A. That was not my job.  
 22 Q. Did you ever do it?  
 23 A. I am not responsible for keeping  
 24 his numbers so that wasn't my job at all.  
 25 Q. But did you ever do it? I know

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1 G Maxwell - Confidential  
 2 it's not your job but did you ever do it, did  
 3 you ever keep phone contact information for  
 4 him?  
 5 A. During the course of the time we  
 6 were together, if he gave me a telephone  
 7 number, I would give it to an assistant to  
 8 put in the computer, I could do that.  
 9 Q. Would he ask you for contact  
 10 information for different individuals, if he  
 11 wanted to contact someone?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. In the course of the long period of  
 15 time when I was there, it certainly would be  
 16 possible for him to ask me for a telephone  
 17 number and if I had the -- I wouldn't always  
 18 have it -- I'm sure it happened.  
 19 Q. Was there a hardcopy book in  
 20 addition to the computer, a hardcopy book  
 21 that you could look for numbers that were  
 22 relevant to Jeffrey Epstein's life and  
 23 something on the computer or was it just an  
 24 electronic version?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 Q. Was there a hard copy book as well  
 4 as something on the computer or was there  
 5 only electronic information on the phone  
 6 numbers?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I can only testify to what I know  
 10 obviously, and I believe that this is a copy  
 11 of a stolen document. I would love to know  
 12 how you guys got it.  
 13 Q. I'm asking during the time you  
 14 worked for Jeffrey Epstein, was there a  
 15 hardcopy document of any kind that kept phone  
 16 numbers for Jeffrey Epstein, if he needed to  
 17 contact someone?  
 18 A. The stolen document I have in front  
 19 of me that you have is what you are referring  
 20 to.  
 21 Q. So there was, during your time when  
 22 you were there, there was no other, you  
 23 mentioned there was information on a  
 24 computer. Was there any hardcopy document  
 25 that you could refer to to find someone's

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1 G Maxwell - Confidential  
 2 number?  
 3 A. You have the stolen document in  
 4 front of you.  
 5 Q. You had access to this when you  
 6 worked for Jeffrey Epstein?  
 7 A. This is, I believe, the book that  
 8 was stolen, that was the hardcopy of whatever  
 9 was there.  
 10 Q. So when you were working for  
 11 Jeffrey Epstein, you were able to access this  
 12 book?  
 13 A. This book -- if this is what this  
 14 is, I believe it was, this is the stolen  
 15 document from his house.  
 16 Q. And you were able to access it when  
 17 you worked for him?  
 18 A. It was a document that was printed  
 19 that you could, if you needed to, look for a  
 20 number.  
 21 Q. Do you know how this book was  
 22 created?  
 23 A. No.  
 24 Q. When you referred to it a moment  
 25 ago, to a stolen document, when Alfredo

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1 G Maxwell - Confidential  
 2 Rodriguez turned this document over to the  
 3 FBI, are you aware he described it as a  
 4 document that came from your computer?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I have no idea what he said or  
 8 didn't say, so if you want me to reference  
 9 something he said, you need to show it to me.  
 10 Q. Did you keep this document, an  
 11 electronic copy of it, on your personal  
 12 computer?  
 13 A. I don't recollect.  
 14 Q. If you had to update something, for  
 15 example, if there was a new number, a new  
 16 individual that Jeffrey had hired that you  
 17 were going to track, would you input that  
 18 information into this document on your  
 19 computer?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I've already testified that I'm not  
 23 responsible for updating and keeping these  
 24 records.  
 25 Q. Did you have this document on your

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 2 computer, your personal computer?  
 3 A. I told you, I don't recollect  
 4 having this document on my computer.  
 5 Q. Do you know what computers this  
 6 document was on, if more than one?  
 7 A. I'm sorry, this is a long time ago  
 8 and I don't recall exactly how this was all  
 9 managed.  
 10 Q. If you didn't create this document,  
 11 do you know who did?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I don't.  
 15 Q. I'm going to direct your attention  
 16 to part of this document. It's towards the  
 17 back, it's going to be page 91 and it has  
 18 bates label Giuffre 001663. I'm going to  
 19 direct your attention to the section that  
 20 says, Massage Florida.  
 21 Did you input any of the names or  
 22 numbers under that section?  
 23 MR. PAGLIUCA: Objection to form  
 24 and foundation.  
 25 A. So this document is produced in

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 2 2004, 2005, so, no.  
 3 Q. But I'm sorry, correct me if I'm  
 4 misunderstanding your testimony, I thought  
 5 you said when you were working with Jeffrey,  
 6 that this document existed and it was  
 7 something you utilized?  
 8 A. I can't possibly tell you what  
 9 numbers were added or not added subsequent to  
 10 my departure.  
 11 Q. So you can't recall if you added  
 12 any of these numbers?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation, mischaracterizes  
 15 the witness' testimony.  
 16 Q. Are there any numbers on here or  
 17 names that you recognize that you would have  
 18 entered into this section?  
 19 A. I already testified that I'm not  
 20 responsible for inputting numbers and names  
 21 into this so I would not be able to tell you.  
 22 Q. Are there any names or numbers  
 23 under this section, Massage Florida, that you  
 24 would have provided to an assistant to input  
 25 into this document?

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 2 A. I can't possibly say.  
 3 Q. Do you see under Massage Florida,  
 4 about halfway down the first column, do you  
 5 see a number that says Johanna's cell?  
 6 MR. PAGLIUCA: What page?  
 7 Q. It's 91, Bates number 001663.  
 8 About halfway down, it says in the first  
 9 column, it says Johanna's cell.  
 10 Do you see that?  
 11 A. I do.  
 12 Q. Would you have provided after, I  
 13 know you didn't hire her, Jeffrey hired her  
 14 but after you brought her to Jeffrey, would  
 15 you have given her cell phone number to an  
 16 assistant to input into this document?  
 17 MR. PAGLIUCA: Objection to form  
 18 and foundation.  
 19 A. I didn't bring her to Jeffrey, the  
 20 way you characterize and I would have no  
 21 knowledge of how this number ended up in this  
 22 book.  
 23 Q. I believe you, and I will try to  
 24 use your words so we are clear, you met  
 25 Johanna, is that correct?

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 2 A. Yes.  
 3 Q. And then she began working for  
 4 Jeffrey?  
 5 A. Yes.  
 6 Q. Would you have provided whomever  
 7 was in charge of keeping this updated with  
 8 Johanna's cell number so you would be able to  
 9 contact her if needed?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I don't know. It could have been a  
 13 number of different ways, it it could have  
 14 been Jeffrey who gave it to somebody.  
 15 Q. You just don't remember doing that?  
 16 A. I do not.  
 17 Q. Now, as you look -- I want you to  
 18 take a look at the Florida massage list, it's  
 19 three columns there.  
 20 Do you, as you look at those names  
 21 on the various columns, do you know the ages  
 22 of any of the girls in this list?  
 23 A. I don't know. One, I don't know  
 24 who all the people are on this list and I  
 25 certainly don't know the ages.

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 2 Q. Do you know what their  
 3 qualifications are?  
 4 A. I don't know who the people are in  
 5 general so of course I don't know what their  
 6 qualifications are.  
 7 Q. Do you know why Jeffrey has so many  
 8 masseuses listed in Florida in his book here?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. Again, this book was created post  
 12 my departure, so I couldn't explain why all  
 13 these people were here.  
 14 Q. When you were there, you said this  
 15 book existed?  
 16 A. Yes.  
 17 Q. So when you were there, were there  
 18 a number of masseuses listed under the  
 19 Florida massage?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation and  
 22 mischaracterization of the witness'  
 23 testimony.  
 24 Q. I'm asking you a question.  
 25 When you were there, were there a

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 2 number of masseuses listed under the Florida  
 3 massage section?  
 4 A. When I was there, I would have, of  
 5 course there would have been some masseuses  
 6 listed but I could not tell you who or how  
 7 many and this -- I could not possibly because  
 8 I wouldn't remember.  
 9 Q. Do you know why Jeffrey would have  
 10 had so many names listed under his massage  
 11 Florida?  
 12 MR. PAGLIUCA: Objection to form  
 13 and foundation.  
 14 A. I can't testify to why Jeffrey has  
 15 so many.  
 16 Q. Did he use a different masseuse  
 17 every day?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 Q. You can answer.  
 21 A. When I was there he had a massage  
 22 roughly every day, one masseuse, and mostly  
 23 he would have them at random times, so it  
 24 would be difficult if you just only had one  
 25 person, man, woman, for an adult massage, to

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 2 come and be available for whatever time it  
 3 was. So he would have more than one person  
 4 that he could call for a massage because at  
 5 any given time the one that he called first  
 6 may not have been available.  
 7 Q. So would it typically be a  
 8 different person each day that would give him  
 9 a massage?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. It would be, when I was there,  
 13 based on availability.  
 14 Q. Would it surprise you to learn that  
 15 the Federal Government found that some of the  
 16 girls on this list under massage Florida were  
 17 under the age of 18?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I can't testify to what the  
 21 government found or did not find because I  
 22 would have no knowledge of it.  
 23 Q. I'm asking if you would be  
 24 surprised by that?  
 25 MR. PAGLIUCA: Form and foundation.

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 2 A. I have knowledge of it. I can't  
 3 speculate.  
 4 Q. On the second column, towards the  
 5 bottom, there is the name, it's one up from  
 6 the bottom, there is the name Gwendolyn Beck,  
 7 do you know Gwendolyn Beck?  
 8 A. I do.  
 9 Q. Who is she?  
 10 A. She was a friend of Jeffrey's.  
 11 Q. Is she a masseuse?  
 12 A. She, I don't think she was a  
 13 masseuse, no.  
 14 Q. Why would be she listed under  
 15 Florida massages?  
 16 A. An input error.  
 17 Q. Is this list any individual that  
 18 would have sex with Jeffrey?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I wouldn't have any knowledge of  
 22 that.  
 23 Q. Do you know if Jeffrey had sex with  
 24 Gwendolyn Beck?  
 25 MR. PAGLIUCA: Object to the form

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 2 and foundation.  
 3 A. First of all, I wouldn't have any  
 4 knowledge of that.  
 5 MS. McCAWLEY: We are going to take  
 6 a quick break.  
 7 THE VIDEOGRAPHER: It's now 4:39  
 8 and we are off the record.  
 9 (Recess.)  
 10 THE VIDEOGRAPHER: It's now 4:54  
 11 and we are as back on the record  
 12 starting disk number 8.  
 13 Q. Ms. Maxwell, we were talking  
 14 earlier about the journal and I believe you  
 15 said in 2004, 2005, you were no longer  
 16 working and responsible for that journal, is  
 17 that correct?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. What are we referring to, this  
 21 document right here?  
 22 Q. Yes.  
 23 A. I don't know who is the author of  
 24 this or I can't tell you what is in here  
 25 versus what would have been here when I was

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 2 around. I can't testify to that.  
 3 Q. Were you around in 2004, 2005?  
 4 A. I already testified that I was  
 5 there when Jeffrey's mother passed away and  
 6 so you know, I did visit for her passing and  
 7 I believe I was there for a couple of days in  
 8 2005.  
 9 Q. So if an employee of Mr. Epstein in  
 10 2004 said that you were the employee's direct  
 11 supervisor, would that be incorrect?  
 12 MR. PAGLIUCA: Objection to form  
 13 and foundation.  
 14 A. What employee, what's the  
 15 circumstances and what is the story, I don't  
 16 know what you are asking me.  
 17 Q. If Alfredo Rodriguez said in 2004  
 18 when he was hired, you were his direct  
 19 supervisor, would that be true?  
 20 A. No.  
 21 Q. Were you in 2004 supervising Sarah  
 22 Kellen?  
 23 MR. PAGLIUCA: Objection to form  
 24 and foundation.  
 25 A. I never supervised Sarah Kellen.

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 2 Q. Did Sarah Kellen take orders from  
 3 you?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. She worked for Jeffrey.  
 7 Q. If Alfredo Rodriguez said you had  
 8 knowledge of underage girls coming to  
 9 Jeffrey's home for the purpose of sex, would  
 10 you contend that that is truthful?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation of the question.  
 13 A. I have no idea what you are talking  
 14 about, I'm sorry.  
 15 Q. If Alfredo Rodriguez said that you  
 16 have knowledge of underage girls coming to  
 17 Jeffrey's home for the purpose of having  
 18 massages involving sex, would you say that  
 19 that statement is truthful?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I can't testify to what Alfredo  
 23 said or didn't say.  
 24 Q. I'm saying if Alfredo said that you  
 25 had knowledge that there were girls coming

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 2 over to the house that were underage for the  
 3 purposes of sex, would that statement be  
 4 true?  
 5 MR. PAGLIUCA: Objection to form  
 6 and foundation.  
 7 A. I can't testify to what Alfredo  
 8 said or didn't say or what he thought.  
 9 Q. Did you have knowledge of underage  
 10 girls coming to Jeffrey Epstein's house for  
 11 the purpose of sex?  
 12 A. No.  
 13 Q. Earlier I believe you testified,  
 14 correct me if I'm wrong, that the document  
 15 that is in front of you, the thicker document  
 16 was a stolen document.  
 17 Do you know who stole that  
 18 document?  
 19 A. I have read that Alfredo stole the  
 20 document.  
 21 Q. And where have you read that?  
 22 A. I believe it was reported in the  
 23 press.  
 24 Q. Earlier we were talking about the  
 25 computers at Jeffrey Epstein's home. Did you

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 2 have a computer that was your computer  
 3 located in Jeffrey Epstein's home?  
 4 MR. PAGLIUCA: Objection to form  
 5 and foundation.  
 6 A. I've testified to the computer  
 7 already. Even when I was around, there was a  
 8 computer that people had access to.  
 9 Q. So is Alfredo Rodriguez telling the  
 10 truth when he says that he downloaded that  
 11 book from your computer?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I couldn't possibly tell you what  
 15 Alfredo did or didn't do or said or didn't  
 16 say.  
 17 Q. Was it on your computer?  
 18 A. I already testified I have no idea  
 19 where this document came from.  
 20 Q. Did you have a list of names of  
 21 individuals with contact information for  
 22 Jeffrey Epstein on your personal computer?  
 23 A. Again, that wasn't my computer. I  
 24 already said that was a computer that lots of  
 25 people would have, so I have no recollection

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 2 of this document being on it, so I don't know  
 3 where this came from.  
 4 Q. I understand the computer at the  
 5 house that you're referencing. On a personal  
 6 computer of yours, did you have that  
 7 document?  
 8 A. I don't know where this document  
 9 came from, so I can't possibly say this  
 10 document was on any computer that I may have  
 11 had access to.  
 12 Q. On a personal computer of your own,  
 13 did you have lists of the phone numbers and  
 14 contact information relating to Jeffrey  
 15 Epstein?  
 16 A. Like everybody, I have an address  
 17 book but I can't possibly testify to where  
 18 this thing came from.  
 19 Q. Was it your address book or was it  
 20 addresses that related to Jeffrey Epstein?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I don't know what you're asking me.  
 24 Q. On your personal computer, the  
 25 address book you are referencing, was it your

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 2 address book with individuals you knew or was  
 3 it an address book for your employer, Jeffrey  
 4 Epstein?  
 5 A. Jeffrey has his situation and I  
 6 have no -- this is Jeffrey's, it came from  
 7 his home, so I can't testify to anything  
 8 about this in that period of time.  
 9 Q. So you didn't have on your computer  
 10 a list of contact information for individuals  
 11 that was related to Jeffrey Epstein?  
 12 A. I don't recall exactly what I had  
 13 back in 2004 and 2005, so I can't say what I  
 14 had back then that relates to his addresses,  
 15 I can't recall.  
 16 Q. So is it possible that someone  
 17 could have downloaded from your personal  
 18 computer a list of names and address that  
 19 were affiliated with Jeffrey Epstein?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. This didn't come from any computer  
 23 of mine.  
 24 Q. But is it possible that someone  
 25 could have downloaded a list of names and

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1 G Maxwell - Confidential  
 2 addresses affiliated with Jeffrey Epstein  
 3 from your computer?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I already said, I didn't have a  
 7 computer there, so I don't know where this  
 8 came from, I have no idea.  
 9 Q. I'm going to read to you some  
 10 testimony from Alfredo Rodriguez's deposition  
 11 and it's on page 370 and I want to ask you a  
 12 question about it, if it's true or false?  
 13 MR. PAGLIUCA: I'm going to object  
 14 unless you show the witness the  
 15 document.  
 16 MS. McCAWLEY: I will pass it. We  
 17 are not going to mark it. We will skip  
 18 it.  
 19 Q. Did you ever tell Alfredo Rodriguez  
 20 that he better watch out and better keep his  
 21 mouth shut with respect to what occurred at  
 22 Mr. Epstein's home?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. It doesn't sound like anything I

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 2 would say.  
 3 Q. Did you ever threaten Alfredo  
 4 Rodriguez in any way if he were to disclose  
 5 information he learned from his employment  
 6 with Jeffrey Epstein?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I'm happy to answer. No, I never  
 10 threatened him in any way.  
 11 Q. Were you concerned that he was  
 12 going to disclose that Jeffrey Epstein was  
 13 trafficking underage girls?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 A. First of all, there are so many  
 17 things wrong with that question, but I have  
 18 no knowledge of what you are talking about.  
 19 Q. Have you ever contacted or  
 20 instructed anyone to contact any witness in  
 21 this case for the purposes of threatening  
 22 them not to testify in this case?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. I have never called anybody with

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 2 reference to this case with any, anything you  
 3 just mentioned, I never threatened anyone.  
 4 Q. Have you ever directed anyone to  
 5 call any witnesses relevant to this case and  
 6 threaten them not to testify?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I never done such a thing.  
 10 Q. Did Jeffrey Epstein or you ever ask  
 11 any female, regardless of age, to carry  
 12 Jeffrey's baby for him?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 Q. Or anything along those lines?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. Can you repeat the question,  
 19 please?  
 20 Q. Did you or Jeffrey Epstein ever ask  
 21 any female, regardless of age, to carry  
 22 Jeffrey Epstein's baby for him?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Are you asking --

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 2 Q. To become pregnant, did you or  
 3 Jeffrey Epstein ever ask any female to become  
 4 pregnant and carry Jeffrey Epstein's baby for  
 5 you or for Jeffrey?  
 6 MR. PAGLIUCA: Objection to form  
 7 and foundation.  
 8 A. You need to be very specific. I  
 9 have no idea what you are talking about.  
 10 That's completely rubbish.  
 11 Q. Did you or Jeffrey Epstein ask any  
 12 female to become pregnant and carry his baby  
 13 for either him or you?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation. Go ahead.  
 16 A. I can't testify to anything Jeffrey  
 17 did or didn't do when I am not present, but I  
 18 have never asked anybody to carry a baby for  
 19 me.  
 20 Q. Or anything along those lines?  
 21 MR. PAGLIUCA: Object to the form  
 22 and foundation.  
 23 Q. I want to make sure we are talking  
 24 about the same thing, not physically carry a  
 25 baby, I mean become pregnant with a baby?



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 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 Q. I want to make sure we are clear.  
 5 A. I don't know what you are asking.  
 6 Q. That's why I want to make sure we  
 7 are clear.  
 8 A. We are clear. I never asked  
 9 anybody to carry a baby for me.  
 10 Q. Do you know if Jeffrey ever asked  
 11 anybody to carry a baby for him?  
 12 A. I'm not going to characterize any  
 13 conversation Jeffrey had with somebody else.  
 14 Q. You are not aware of that, is that  
 15 your testimony?  
 16 A. I am testifying I never have and I  
 17 will not testify for anything for Jeffrey.  
 18 Q. Did you ever hear Jeffrey ask  
 19 anybody to carry a baby for him?  
 20 A. I don't recollect conversation  
 21 about Jeffrey and babies in any form.  
 22 Q. Did Jeffrey ever tell he wanted to  
 23 have a baby?  
 24 A. I don't recollect baby  
 25 conversations with Jeffrey.

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 2 Q. So he never told you he wanted to  
 3 have a baby?  
 4 A. I don't recollect any baby  
 5 conversations with him saying he wanted to  
 6 have a baby.  
 7 Q. Did you ever bring any females to  
 8 the Dubin's house that were not your friends'  
 9 children that were under the age of 18?  
 10 MR. PAGLIUCA: Objection to form  
 11 and foundation.  
 12 A. I have never, to my knowledge,  
 13 brought anybody under the age of 18 that's  
 14 not a friend of my family or my nieces or  
 15 nephews to the Dubin household.  
 16 Q. Earlier today you testified, I  
 17 believe, that with respect to your town home  
 18 Jeffrey paid for some of that and then gave  
 19 you a loan, is that correct?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I said, actually I think it was a  
 23 loan, I believe it was a loan.  
 24 Q. The whole thing?  
 25 A. As best as I can recollect.

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 2 Q. Did you pay that loan back?  
 3 A. I don't have any outstanding loans  
 4 with him.  
 5 Q. So you paid it back?  
 6 A. I don't have any outstanding loans  
 7 with him.  
 8 Q. That's not an answer to my  
 9 question.  
 10 Did you pay back Jeffrey for the  
 11 loans?  
 12 A. I have paid back any loans I had  
 13 with him.  
 14 Q. You have or haven't?  
 15 A. Have.  
 16 Q. Were there any other gifts that  
 17 Jeffrey gave you during the time period of  
 18 say 1999 to the present that were in excess  
 19 of \$50,000?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. What's the question again?  
 23 Q. Did Jeffrey give you any gifts in  
 24 excess of amounts of \$50,000, I'm not talking  
 25 about a scarf here or something

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1 G Maxwell - Confidential  
 2 insignificant, from 1999 to the present?  
 3 A. I can't recollect any gifts.  
 4 Q. Did he ever buy you a car?  
 5 A. I really don't recall, I can't  
 6 recall, it's a long time ago.  
 7 Q. You can't recall if Jeffrey Epstein  
 8 ever bought you a car?  
 9 A. I believe he did buy me a car, I  
 10 don't recall how much it cost. I don't  
 11 recall any of the financial details of that.  
 12 Q. Do you still have that car?  
 13 A. I don't.  
 14 Q. How long ago did you get rid of  
 15 that car?  
 16 A. I don't recall all the cars. There  
 17 was a car back -- there was -- I don't  
 18 recall, I'm sorry.  
 19 Q. He supplied you with several cars?  
 20 MR. PAGLIUCA: Object to the form  
 21 and the mischaracterization of the  
 22 testimony.  
 23 A. I don't recall details of the cars.  
 24 Q. Did he supply with you more than  
 25 one car?

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 2 A. Over the course of time, I've  
 3 driven many cars.  
 4 Q. That Jeffrey provided to you?  
 5 A. They were cars that could be driven  
 6 and I just don't recall them.  
 7 Q. Were they in your name?  
 8 A. I don't recall.  
 9 Q. You don't recall if Jeffrey Epstein  
 10 ever put a car in your name?  
 11 A. We are talking a long time ago, I  
 12 really don't recall.  
 13 Q. When is the last time you had a car  
 14 from Jeffrey Epstein that you used?  
 15 A. 2000, 2001, 2002.  
 16 Q. Do you recall what kind of a car  
 17 that was?  
 18 A. I don't recall, I'm sorry.  
 19 Q. Did Jeffrey Epstein purchase  
 20 anything else for you besides the townhouse  
 21 and cars that would be over the amount of  
 22 \$50,000?  
 23 A. I didn't say that he did, I said I  
 24 had a loan.  
 25 Q. Besides the loan, I'm sorry, you

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 2 are right, you did say you had a loan and you  
 3 said you paid that back, correct?  
 4 A. That's my testimony.  
 5 Q. Anything else in excess of \$50,000  
 6 that he would have purchased for you?  
 7 A. We are talking 2002, 2001, I don't  
 8 recall any gifts really.  
 9 Q. When is the last time Jeffrey  
 10 Epstein gave you a gift in excess of \$50,000?  
 11 MR. PAGLIUCA: Assumes facts not in  
 12 evidence. Form and foundation.  
 13 Q. You're saying you don't remember  
 14 from 2001 and 2002. I'm asking when is the  
 15 last time you remember Jeffrey Epstein  
 16 purchasing a gift for you?  
 17 A. I don't recall gifts in excess of  
 18 \$50,000, I barely recall gifts, I barely  
 19 recall a lot of this -- I'm sorry, I don't  
 20 recall.  
 21 Q. Is Jeffrey Epstein paying for your  
 22 legal fees in this case?  
 23 A. No.  
 24 Q. Is he paying for anything related  
 25 to this case?

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 2 A. No.  
 3 Q. Are you aware of any grand theft  
 4 police report relating to Virginia Roberts?  
 5 A. I believe I've read a report in the  
 6 press on that.  
 7 Q. Did you provide the press with a  
 8 report on a grand theft by Virginia Roberts?  
 9 A. I don't know how the press got that  
 10 story.  
 11 Q. Do you know if Virginia Roberts  
 12 committed a grand theft?  
 13 A. I only know what I read in the  
 14 press.  
 15 Q. Did you ever state to the press  
 16 that Virginia Roberts committed a grand  
 17 theft?  
 18 A. I've never had any conversation  
 19 directly with press.  
 20 Q. Did any of your representatives  
 21 ever inform the press that Virginia Roberts  
 22 committed a grand theft?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. I have no way of knowing what my

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 2 representatives said to press or didn't.  
 3 Q. Did they ever discuss with you the  
 4 fact that they were going to report that  
 5 Virginia Roberts participated in a grand  
 6 theft?  
 7 A. I don't know how, first of all, I  
 8 don't know how I know that. I believe I read  
 9 it in a press report so...  
 10 Q. I'm going to mark this as composite  
 11 exhibit, Maxwell 14 please?  
 12 (Maxwell Exhibit 14, email, marked  
 13 for identification.)  
 14 Q. I'm going to direct you to page GM  
 15 00109. At the top of that page you are going  
 16 to see an email address from Jeffrey Epstein  
 17 on Sunday June 12, 2011 to [REDACTED]  
 18 [REDACTED]  
 19 A. Yes.  
 20 Q. The re line says, This is the  
 21 actual version they wanted me to send which I  
 22 changed but this is back from my U.K.  
 23 lawyers.  
 24 Do you see that?  
 25 A. Yes.

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1 G Maxwell - Confidential  
 2 Q. If you go down further, you're  
 3 going to see halfway through the page, you  
 4 will see your email address the [REDACTED]  
 5 and you will see a statement that says, Thank  
 6 you. I have it now. I'm working on the  
 7 letter a little. I will send final version  
 8 tomorrow and whatever is in it will be  
 9 factually accurate.  
 10 Beneath that you will see Philip  
 11 Barden who I believe you identified earlier  
 12 as one of your attorneys?  
 13 A. Uh-huh.  
 14 Q. And you will see a letter, starting  
 15 the text of a letter starting, I want you to  
 16 turn to the second page which is GM 00110.  
 17 About halfway through the page, it says you  
 18 will also presumably draw attention to the  
 19 fact that prior to filing her suit against  
 20 Mr. Epstein, Ms. Roberts fled the U.S. to  
 21 avoid being arrested for grand theft. Police  
 22 report available.  
 23 What grand theft were you referring  
 24 to there that Virginia Roberts committed?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I don't know. However, I believe  
 4 she stole money from somewhere where she  
 5 worked.  
 6 Q. How do you know that was grand  
 7 theft?  
 8 A. I don't know how I know that.  
 9 Q. So you authorized a statement that  
 10 characterized that as grand theft without  
 11 knowing whether it was grand theft?  
 12 A. What month, what is the date of  
 13 this?  
 14 Q. The date of this is June 12, 2011?  
 15 A. So I'm afraid such a long time ago,  
 16 I'm not sure how, I really couldn't testify  
 17 as to how that language ended up in here.  
 18 Q. Do you have the police report? It  
 19 says police report available. Do you have  
 20 that document?  
 21 A. I don't have that document.  
 22 Q. Who does?  
 23 A. I have no idea.  
 24 Q. Would your lawyer Philip Barden  
 25 have that document?

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1 G Maxwell - Confidential  
 2 A. I don't know who has this document.  
 3 Q. What's your basis in that statement  
 4 for saying Ms. Roberts fled the U.S.?  
 5 A. Again, you are asking me for a  
 6 statement that I made in 2011 and I can't say  
 7 what in 2011 exactly the basis of that  
 8 statement was.  
 9 Q. So you don't know whether or not  
 10 that statement is true?  
 11 A. This is in 2011 and it never went  
 12 out, so I'm not sure exactly.  
 13 Q. But you said in your email that you  
 14 were working to make it factually accurate,  
 15 is that correct?  
 16 A. That's what it says.  
 17 Q. I'm going to mark as Maxwell 15 a  
 18 document dated February 24, 2015?  
 19 (Maxwell Exhibit 15, email, marked  
 20 for identification.)  
 21 Q. This is an email from Ross Gow who  
 22 you've identified as your press agent on  
 23 February 24, 2015 to [REDACTED] which I understand  
 24 to be your email address and Philip Barden.  
 25 The subject line says, VR cried rape. Prior

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1 G Maxwell - Confidential  
 2 case dismissed as prosecutors found her not  
 3 credible. The message says, Ghislaine, some  
 4 helpful leakage, dot dot dot. What is it you  
 5 were leaking to the press?  
 6 MR. PAGLIUCA: Objection, there is  
 7 no foundation that she leaked anything  
 8 and you know that.  
 9 Q. What was it that you were leaking  
 10 to the press in that statement?  
 11 A. Again, I don't think that's  
 12 referring to that, that's just referring to  
 13 the press getting hold of whatever story it  
 14 is.  
 15 Q. What was Ross Gow leaking to the  
 16 press?  
 17 MR. PAGLIUCA: Objection to form  
 18 and foundation.  
 19 A. It doesn't say Ross was leaking  
 20 anything. It doesn't say that.  
 21 Q. The statement says, helpful  
 22 leakage, is that correct?  
 23 A. It says helpful leakage. That  
 24 doesn't mean he leaked anything.  
 25 Q. Did you leak to the press

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1 G Maxwell - Confidential  
 2 information to the press information about  
 3 the subject line, VR cried rape, prior case  
 4 dismissed as prosecutors found her not  
 5 credible?  
 6 A. I don't no idea what Ross is  
 7 referring to. I think he is referring to the  
 8 press held the story. I couldn't testify to  
 9 that.  
 10 Q. Did you leak to the press  
 11 information regarding the statement, VR cried  
 12 rape prior case dismissed as prosecutors  
 13 found her not credible, either through you or  
 14 through your press agents?  
 15 A. I think this is coming from the  
 16 daily mail.  
 17 Q. That is not my question, I'm asking  
 18 whether you or your press agent leaked that?  
 19 A. I have no knowledge, I have no  
 20 idea, I'm sorry. I can't -- I have no  
 21 recollection. I have no idea what she is  
 22 talking about.  
 23 Q. I'm going to mark this as 16?  
 24 (Maxwell Exhibit 16 email marked  
 25 for identification.)

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1 G Maxwell - Confidential  
 2 Q. This is an email addressed at the  
 3 top from Jeffrey Epstein on Monday, January  
 4 12, 2015 to [REDACTED] which I understand to be  
 5 your email address. The email reads, You can  
 6 issue a reward to any of Virginia's friends,  
 7 acquaints, family, that come forward to help  
 8 prove her allegations are false. The  
 9 strongest is the Clinton dinner and the new  
 10 version of the Virgin Islands that Stven  
 11 Hawking practiced in an underage orgy.  
 12 Did you offer any rewards to  
 13 Virginia's family or friends to contradict  
 14 Virginia's story?  
 15 A. Absolutely not.  
 16 Q. Did Jeffrey Epstein offer any  
 17 rewards to any of Virginia's, as he suggests  
 18 here, friends, family or acquaintances to  
 19 contradict Virginia's story?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I have no idea what he did.  
 23 Q. Did he tell he was going to offer  
 24 rewards to Virginia's acquaintances, friends  
 25 and family to prove her allegations were

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1 G Maxwell - Confidential  
 2 false?  
 3 A. He did not.  
 4 Q. Do you know whether Jeffrey Epstein  
 5 paid Rebecca Boylen to give testimony about  
 6 Virginia Roberts?  
 7 A. I don't know who Rebecca Boylen is.  
 8 Q. So you don't know whether Jeffrey  
 9 Epstein paid her?  
 10 A. I don't know who Rebecca Boylen is.  
 11 Q. Have you ever contacted any of  
 12 Virginia's friends, acquaintances or family  
 13 regarding this case?  
 14 A. I don't know who Virginia's friends  
 15 or family are and I have not contacted  
 16 anybody related to her in any way, shape or  
 17 form.  
 18 Q. I will turn you, I believe it's the  
 19 thicker document which is Maxwell, I believe  
 20 it was 14, right there, the compilation  
 21 document to GM, at the bottom, GM 00071. You  
 22 actually may want to turn to the prior page  
 23 70 so you can see the email chain. At the  
 24 top of the page --  
 25 MR. PAGLIUCA: I don't have a 00071

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1 G Maxwell - Confidential  
 2 on mine.  
 3 MS. McCAWLEY: It's the second page  
 4 in that document.  
 5 MR. PAGLIUCA: Okay.  
 6 Q. It's dated Friday March 11, 2011  
 7 from Maxwell to Jeffrey with the title, Daily  
 8 Mail and there is a forward from Ross Gow to  
 9 you and a number of other individuals, that's  
 10 on the cover page and as you scroll to the  
 11 second page, you are going to see that part  
 12 of the chain that I'm asking about and that  
 13 is the chain at the bottom which is dated  
 14 3/10/2011 from Brian Basham and it says we  
 15 think -- we should think about the letter to  
 16 the editor. School can be university. Age  
 17 of consent in Florida is complex. See below,  
 18 if you are 16 years old, a sexual  
 19 relationship with someone between 18 and 24  
 20 is legal in Florida. Two persons between 16  
 21 and 24, Florida statute 794.05. A person 24  
 22 years or of age or older who engages in  
 23 sexual activity with a person 16 or 17 years  
 24 of age commits a felony in the second degree.  
 25 So as soon as you turn 16 you are able to

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1 G Maxwell - Confidential  
 2 have sexual relations and you can have sexual  
 3 relations with a minor under the age of 18  
 4 until your 24th birthday.  
 5 Why were you concerned with the age  
 6 of consent in Florida?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation of the question.  
 9 A. I wasn't concerned. I think this  
 10 was somebody sending me the statute for  
 11 informational purposes.  
 12 Q. Who is Brian Basham?  
 13 A. He is the person who, Ross Gow's  
 14 boss I believe, I don't know what the  
 15 relationship is.  
 16 Q. I didn't hear you?  
 17 A. I think he owns the agency, I'm not  
 18 sure exactly.  
 19 Q. Why would he be sending you  
 20 information addressing concerns about the age  
 21 of consent in Florida?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. I think he was just trying to be --  
 25 telling me details that would happen,

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1 G Maxwell - Confidential  
 2 Virginia in '11 was claiming she was 15 and  
 3 we thought she was 17. I didn't know what  
 4 the statutes were in Florida and I think he  
 5 was just trying to be helpful so I would  
 6 know.  
 7 Q. Did you have a concern that you had  
 8 violated this statute in Florida?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. No.  
 12 Q. Did you have a concern that Jeffrey  
 13 Epstein had violated this statute in Florida?  
 14 A. I'm not concerned what happened  
 15 with Jeffrey. I'm only concerned what  
 16 happens with me.  
 17 Q. Why did you communicate with your  
 18 press agent about the sexual consent age in  
 19 Florida?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation. It misstates her  
 22 testimony.  
 23 A. I wasn't concerned. I think he was  
 24 being helpful and stating what the statute  
 25 was.

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1 G Maxwell - Confidential  
 2 Q. I'm going to turn you now in that  
 3 same stack the Bates number GM 00088. At the  
 4 top of the email you are going to see Jeffrey  
 5 Epstein, dated June 8, 2011, to you and it's  
 6 got a re line, Vanity Fair. If you go down  
 7 the chain you will see where it says under  
 8 your email, Do you have a problem with  
 9 anything I said.  
 10 Were you communicating with Jeffrey  
 11 to confirm what statements you could put in  
 12 any press releases you were given?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. Any interest I have is in accuracy.  
 16 Q. Were you confirming with Jeffrey  
 17 Epstein what information you could put in  
 18 press releases?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. Again, I'm only looking for  
 22 accuracy.  
 23 Q. Why would you ask him if he had a  
 24 problem with anything you were saying?  
 25 A. If there is anything I

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1 G Maxwell - Confidential  
 2 characterized that was not correct.  
 3 Q. That's not what you said. You  
 4 said, do you have a problem with anything I  
 5 said.  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation. There is no  
 8 question pending.  
 9 MS. McCAWLEY: There is.  
 10 MR. PAGLIUCA: That's not a  
 11 question, it's a statement.  
 12 MS. McCAWLEY: Don't interrupt me.  
 13 Q. Di you say, do you have a problem  
 14 with anything I said?  
 15 A. That was asking in my parlance that  
 16 I wanted him to check it for accuracy.  
 17 Q. Did he tell you there was anything  
 18 inaccurate about the statement?  
 19 A. Again, I have to read the whole  
 20 thing to figure that out.  
 21 Q. Were you coordinating with Jeffrey  
 22 Epstein during this time period in 2011  
 23 regarding statements that you were issuing to  
 24 the press?  
 25 MR. PAGLIUCA: Did you withdraw the

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1 G Maxwell - Confidential  
 2 last question.  
 3 MS. McCAWLEY: I'm not withdrawing  
 4 anything. I'm asking a question.  
 5 MR. PAGLIUCA: There was a question  
 6 pending. You didn't let the witness  
 7 answer the question, then you moved on  
 8 to another question so I'm asking for  
 9 clarification for the record now which  
 10 question are we answering.  
 11 MS. McCAWLEY: There is an answer.  
 12 The question was did he tell you  
 13 anything, there was anything in the  
 14 statement inaccurate about the statement  
 15 and she said again, I read the whole  
 16 thing --  
 17 THE WITNESS: I would have to.  
 18 MS. McCAWLEY: -- I would have to  
 19 read the whole thing to figure that out.  
 20 MR. PAGLIUCA: Then she started  
 21 reading it and you asked another  
 22 question.  
 23 MS. McCAWLEY: That's the question.  
 24 MR. PAGLIUCA: I'm wondering if its  
 25 still pending.

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1 G Maxwell - Confidential  
 2 MS. McCAWLEY: It was answered.  
 3 Q. Were you coordinating with Jeffrey  
 4 Epstein during the time period in 2011  
 5 regarding the statements you were issuing to  
 6 the press?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I only wanted to be accurate in any  
 10 factual statements that I made.  
 11 Q. You knew at that time that Jeffrey  
 12 Epstein had been convicted for sexual abuse  
 13 of a minor, is that correct?  
 14 MR. PAGLIUCA: Objection to form  
 15 and foundation.  
 16 A. He was sentenced I believe for  
 17 underage -- soliciting an underaged  
 18 prostitute.  
 19 Q. You knew that he was a registered  
 20 sex offender?  
 21 A. Yes.  
 22 Q. You were coordinating with him the  
 23 statement that you were going to be making to  
 24 the press to confirm whether they were  
 25 accurate in your words?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I was not coordinating with  
 5 Jeffrey. He had details that I did not have.  
 6 I was not party to his case. I needed to  
 7 have information in order to be able to  
 8 respond so I was not coordinating with him.  
 9 I was merely asking for details that I could  
 10 have.  
 11 Q. Did Jeffrey write any of your press  
 12 statements for you?  
 13 A. No.  
 14 Q. He didn't draft any of them?  
 15 A. I have a lawyer who was working on  
 16 this and that was -- I asked, I believe as I  
 17 recollect asked him for information to make  
 18 sure I was being accurate in the  
 19 representations for whatever I was  
 20 discussing.  
 21 Q. Did Jeffrey provide you with any  
 22 drafts of statements to provide to the press?  
 23 A. I only recall drafts from my  
 24 lawyer.  
 25 Q. I will mark this as Maxwell 17.

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1 G Maxwell - Confidential  
 2 (Maxwell Exhibit 17, email, marked  
 3 for identification.)  
 4 Q. This is an email from you on  
 5 January 10, 2015 to Philip Barden and Ross  
 6 Gow. The statement you had before you  
 7 earlier, that, if you can pull that in front  
 8 of you, the one page press release that you  
 9 gave. You might know from memory.  
 10 Was the press release that you  
 11 issued with the statement about Virginia  
 12 issued in or around January 2, 2015?  
 13 A. As best as I can recollect.  
 14 Q. I want to turn your attention to  
 15 the document I just handed you which is Bates  
 16 No. 001044, from you to Philip Barden and  
 17 Ross Gow. It says in the first sentence, I'm  
 18 out of my depth to understand defamation,  
 19 other legal hazards and I don't want to end  
 20 up in a lawsuit aimed at me from anyone, if I  
 21 can help it. Apparently, even saying  
 22 Virginia is a liar has hazards.  
 23 You knew at the time you called  
 24 Virginia a liar in early January of 2015 that  
 25 that was something that would result in a

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1 G Maxwell - Confidential  
 2 lawsuit, is that correct?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. I have legal advice that I took.  
 6 Q. But you knew in early January by  
 7 making a statement calling Virginia a liar  
 8 that you were subjecting yourself to a legal  
 9 dispute with her?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I took legal advice as to what  
 13 should be said and not be said and the legal  
 14 advice that came from the United Kingdom  
 15 was --  
 16 MR. PAGLIUCA: You are not allowed  
 17 to talk about any legal advice that you  
 18 got from anybody that's a lawyer.  
 19 A. Sorry.  
 20 Q. So is it correct without telling me  
 21 what you talked to your lawyers about that  
 22 you knew because this is dated January 10  
 23 that when you made this statement in early  
 24 January, January 2 of 2015 you knew that  
 25 calling Virginia a liar would subject you to

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1 G Maxwell - Confidential  
 2 a legal action, isn't that correct?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation. As to what you  
 5 knew -- whatever she knows would be  
 6 privileged.  
 7 MS. McCRAWLEY: I'm asking if she  
 8 knows. I'm not asking her to tell me  
 9 about her privileged communications.  
 10 A. All I can say is I asked a question  
 11 and received legal advice.  
 12 (Maxwell Exhibit 18, email, marked  
 13 for identification.)  
 14 Q. This is an email dated January 15,  
 15 2015 from Jeffrey Epstein to you?  
 16 A. Uh-huh.  
 17 Q. It states in the first line, do you  
 18 want [REDACTED] to come out and say she was the  
 19 girlfriend during the time?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation of the question and  
 22 actually the word is [REDACTED], there  
 23 is no vowel in there.  
 24 MS. McCRAWLEY: I was just trying to  
 25 pronounce it.

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1 G Maxwell - Confidential  
 2 Q. This email reads do you want  
 3 [REDACTED] without a vowel, to come out and say  
 4 she was the girlfriend during the time.  
 5 Who was Jeffrey Epstein referring  
 6 to?  
 7 A. I believe he was referring to  
 8 [REDACTED]  
 9 Q. Why was he asking you if you wanted  
 10 [REDACTED] to come out and say she was the  
 11 girlfriend?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. The way the press and you were  
 15 characterizing me is I was with Jeffrey  
 16 throughout this entire period of time and I  
 17 was not.  
 18 Q. Was [REDACTED] with Jeffrey during this  
 19 period of time?  
 20 A. I believe she was.  
 21 Q. Did Jeffrey come out and tell the  
 22 press it was [REDACTED] and not you that was with  
 23 him as he is proposing here?  
 24 A. I don't believe he did.  
 25 Q. Did you want him to do that?

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1 G Maxwell - Confidential  
 2 A. No, I didn't ask him to do  
 3 anything. No.  
 4 Q. So do you know in January of 2015,  
 5 was [REDACTED] his girlfriend?  
 6 A. 2015, I have no idea who was his  
 7 girlfriend in 2015.  
 8 Q. I'm sorry, you are correct.  
 9 In the period of 1999 to 2002, was  
 10 [REDACTED] his girlfriend?  
 11 A. They spent a lot of time together.  
 12 Q. Did you talk to [REDACTED] about going  
 13 to the press and saying that she was the  
 14 girlfriend and not you?  
 15 A. I have never spoken to [REDACTED]  
 16 Q. Was [REDACTED] offered any money to  
 17 make a statement that she was the girlfriend?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I have no idea. I have never  
 21 spoken to [REDACTED] and I don't know anything --  
 22 I have no idea.  
 23 (Maxwell Exhibit 19, email, marked  
 24 for identification.)  
 25 Q. That's an email from Jeffrey to

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1 G Maxwell - Confidential  
 2 Maxwell dated January 25, 2015.  
 3 A. Uh-huh.  
 4 Q. I will direct your attention to the  
 5 bottom email which is from you on Saturday  
 6 January 24, 2015. It says, I would  
 7 appreciate it if [REDACTED] would come out and  
 8 say she was your girlfriend. I think she was  
 9 from the end of '99 to 2002.  
 10 Does that refresh your recollection  
 11 that you asked Jeffrey to have [REDACTED] come  
 12 out and say she was his girlfriend?  
 13 A. I'm sure I would loved anybody to  
 14 come out and say they were with Jeffrey  
 15 rather than me.  
 16 Q. Was that an accurate statement you  
 17 were asking to be made to the press?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. When is this?  
 21 Q. 2015. The statement is whether she  
 22 was the girlfriend from '99 to 2002. As the  
 23 email reads.  
 24 A. What is your question?  
 25 Q. My question is, was that an

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1 G Maxwell - Confidential  
 2 accurate statement you were going to be  
 3 giving to the press?  
 4 A. I didn't make the statement and  
 5 [REDACTED] never came out, so it's completely  
 6 moot.  
 7 Q. My question is, was it an accurate  
 8 statement that [REDACTED] was the girlfriend from  
 9 '99 to 2002 or were you just making that up  
 10 for purposes of deflecting press from you?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. As I said they spent a lot of time  
 14 together and...  
 15 Q. Were you also his girlfriend from  
 16 '99 to 2002?  
 17 A. I don't if I would have ever  
 18 characterized myself as his girlfriend, but  
 19 [REDACTED] at that time, was with him as much if  
 20 not more than I was.  
 21 Q. I will mark this as Maxwell 20?  
 22 (Maxwell Exhibit 20, email, marked  
 23 for identification.)  
 24 Q. This is an email at the top, it's  
 25 Bates labled 001060. At the top is a chain

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1 G Maxwell - Confidential  
 2 from Jeffrey to you on January 11, 2015 and  
 3 if you look below, I'm going to start at the  
 4 bottom of that chain which is January 11 at  
 5 9:15 from Jeffrey and he wrote, Alan, do you  
 6 have an article coming out in Monday's paper.  
 7 If so, could you please forward us a copy.  
 8 Do you know what Alan Jeffrey was  
 9 referring to there?  
 10 A. I don't know.  
 11 Q. If you look up in the email chain  
 12 do you see an email address from Alan  
 13 Dershowitz responding to that letter?  
 14 A. I do.  
 15 Q. So that would be Alan Dershowitz  
 16 that Jeffrey was emailing at that time  
 17 according to this chain, correct?  
 18 A. It certainly looks like it.  
 19 Q. The email from Alan to Jeffrey is,  
 20 Nothing on Monday. I'm working on several  
 21 possible articles about unfairness in the  
 22 legal process that allows false charges to be  
 23 inserted into legal documents with no  
 24 opportunity to respond.  
 25 And do you see above that Jeffrey's

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1 G Maxwell - Confidential  
 2 email to you says, quote, Careful.  
 3 A. Is that to me or to Alan?  
 4 Q. Jeffrey to [REDACTED] at the top. Why  
 5 was Jeffrey telling you to be careful?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I have no idea.  
 9 Q. What was he concerned about with  
 10 Alan Dershowitz's suggestion in the email  
 11 below?  
 12 MR. PAGLIUCA: Objection to form  
 13 and foundation.  
 14 A. I can't possibly know.  
 15 Q. Did you discuss with him why he  
 16 told you to be careful?  
 17 A. I had limited contact with him. I  
 18 don't recall where this goes in the chain,  
 19 why he was telling me to be careful, I have  
 20 no idea.  
 21 Q. Did you respond to this email?  
 22 A. If you don't have it, I didn't  
 23 respond.  
 24 Q. Did you ever delete emails during  
 25 the period of January of 2015?



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1 G Maxwell - Confidential  
 2 A. I have every email that you asked  
 3 for in discovery, that I have I gave you.  
 4 Q. That's not my question.  
 5 Did you ever delete emails in  
 6 January of 2015?  
 7 A. I have not deleted anything that  
 8 you have asked me for in discovery. I have  
 9 given you everything that I have.  
 10 Q. That is not my question, my  
 11 question is, did you ever delete emails in  
 12 January of 2015?  
 13 A. In the normal course of my work,  
 14 there are emails from spam that I delete.  
 15 That is the type of email I've deleted.  
 16 Anything that is material to what you want, I  
 17 have not deleted.  
 18 Q. How do you know that?  
 19 A. Well, anybody that's to do with  
 20 Jeffrey or Alan or women or anything of which  
 21 I know you were interested in, of which I  
 22 have anything I would not have done because I  
 23 don't want to subject myself to...  
 24 Q. Have you had your computer  
 25 forensically copied for purposes of this

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1 G Maxwell - Confidential  
 2 litigation?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. Has someone made a copy of your  
 6 computer for purposes of this litigation.  
 7 A. No.  
 8 Q. Are you a citizen of the United  
 9 States?  
 10 A. I am.  
 11 Q. Are you also a citizen of England?  
 12 A. I am.  
 13 Q. Are you a citizen of any other  
 14 land?  
 15 A. TerraMar.  
 16 Q. That's the name of your charity  
 17 project that deals with oceans, is that  
 18 correct?  
 19 A. Yeah. I'm French as well.  
 20 Q. Has Jeffrey Epstein funded TerraMar  
 21 for you?  
 22 A. He did give some money to TerraMar,  
 23 yes.  
 24 Q. How much?  
 25 A. I believe it was \$50,000.

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1 G Maxwell - Confidential  
 2 Q. Earlier today, you said you were in  
 3 the process of resolving the sale of your  
 4 town home. Where do you intend to live once  
 5 your town home is sold?  
 6 A. That's a good question. I don't  
 7 have an answer for you yet.  
 8 Q. You don't have a present plan. Do  
 9 you intend to live in the United States?  
 10 A. I don't have a present plan.  
 11 Q. Are you living outside of your town  
 12 home right now or are you still there?  
 13 A. I'm just couch surfing.  
 14 Q. Has Jeffrey Epstein ever purchased  
 15 a company for you or put a company in your  
 16 name?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I have no recollection.  
 20 Q. Is there a Ghislaine Maxwell  
 21 corporation, for example?  
 22 A. No, not that I am aware of that has  
 23 anything to do with me. There may be with  
 24 one that someone else owns or started but not  
 25 one that is related to me.

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1 G Maxwell - Confidential  
 2 MS. McCAWLEY: I'm going to take a  
 3 short break and make sure to keep it  
 4 short because I know you wanted to -- I  
 5 just want to wrap up what we have left.  
 6 THE VIDEOGRAPHER: It's now 5:49 we  
 7 are off the record.  
 8 (Recess.)  
 9 THE VIDEOGRAPHER: It's now 6:00  
 10 p.m. and we are back on the record.  
 11 Q. Ms. Maxwell, do you recall being  
 12 subpoenaed for a deposition back in 2009?  
 13 A. I do.  
 14 Q. Why did you avoid giving your  
 15 deposition in that case when you were  
 16 subpoenaed and had the opportunity to tell  
 17 your side of the story?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. That's not what happened.  
 21 Q. What happened?  
 22 A. As I best recall, I was subpoenaed  
 23 and a date was set for the subpoena and  
 24 everything was set and I believe it was with  
 25 Brad Edwards, correct me if I'm wrong, and

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1 G Maxwell - Confidential  
 2 Brad Edwards failed to show up for the  
 3 subpoena.  
 4 Q. So your testimony is Brad Edwards  
 5 did not show up for the deposition that had  
 6 been set?  
 7 A. Correct.  
 8 Q. Did you give any statement that  
 9 your mother was ill and, therefore, you  
 10 couldn't take your deposition and had to  
 11 leave the country indefinitely?  
 12 A. That's an entirely separate  
 13 situation. Brad Edwards was involved in the  
 14 Rothstein scandal which was a RICO, I  
 15 believe, you know, is when fake suits were  
 16 created in Jeffrey's case and Rothstein went  
 17 to jail for 50 years and Brad Edwards worked  
 18 for that firm.  
 19 Q. And Mr. Edwards worked for that  
 20 firm?  
 21 A. So when the subpoena came, Brad  
 22 Edwards was involved with Rothstein in the  
 23 case so when I was called for subpoena, then  
 24 and I had a subpoena, date and time set, Brad  
 25 Edwards went AWAL, meaning he failed to

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1 G Maxwell - Confidential  
 2 respond to calls and failed to get in touch  
 3 with my attorneys, even though a date and  
 4 time was set for the subpoena and so that's  
 5 what happened to that subpoena. It just  
 6 didn't happen.  
 7 Q. We may be talking about two  
 8 different cases so I will ask the question  
 9 again.  
 10 Was there ever a time where you  
 11 were subpoenaed to sit for a deposition that  
 12 you could not make it because you said that  
 13 your mother was ill?  
 14 A. So that is the same subpoena that  
 15 Brad Edwards failed to turn up for and then I  
 16 think five or six months passed between -- a  
 17 period of time, I can't characterize it  
 18 exactly, a period of time passed where then  
 19 he resurfaced and asked for a new subpoena to  
 20 be -- a new time to be set and because he had  
 21 contacted the press and done all sorts of  
 22 things that you guys are familiar with, I  
 23 believe, it was my lawyer suggested that I  
 24 should have some sort of protective order and  
 25 I believe between the time for when Brad

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1 G Maxwell - Confidential  
 2 Edwards resurfaced after the Rothstein story,  
 3 when the guy went to jail for 50 years for  
 4 creating fake cases in Jeffrey's and other  
 5 people's cases, in between the time when  
 6 there were -- trying to figure out the  
 7 protective situation for me, my mother was  
 8 sick, she is 89, she was 89 at that time so I  
 9 -- they -- we can all -- we all have parents,  
 10 so anyone, I don't know how old your parents  
 11 are but any parent or godparent, any  
 12 individual who is in the late 80s 90s, we can  
 13 understand has health issues so my mother's  
 14 health was deteriorating very rapidly at that  
 15 time and we had issues at home with who she  
 16 would talk to and how to manage her, her  
 17 healthcare situation and so I went home.  
 18 They were still arguing about the protective  
 19 order --  
 20 Q. Is it your testimony that there was  
 21 not a date set for your deposition at the  
 22 time you left to go see your mother?  
 23 A. I don't believe so.  
 24 Q. Are you friends with the Clintons?  
 25 A. I am.

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1 G Maxwell - Confidential  
 2 Q. Did you attend a wedding of Chelsea  
 3 Clinton a few weeks after the date was set,  
 4 let's say a few weeks after you left to go  
 5 see your mother who was ill?  
 6 A. I don't recall exactly when I left  
 7 but it was before, a few weeks before -- I  
 8 don't remember the exact timing of that, so  
 9 I'm sorry, can you repeat the question?  
 10 Q. Did you come back to the United  
 11 States to attend Chelsea Clinton's wedding?  
 12 A. I attended Chelsea Clinton's  
 13 wedding but I don't know if I came back  
 14 specifically for that or not.  
 15 Q. When we were looking at the flight  
 16 logs earlier, there was a flight where you  
 17 ended up in the naval base, I believe it was  
 18 in China, do you know how you got clearance  
 19 to land at that naval base?  
 20 A. I need to have a look at whatever  
 21 document.  
 22 Q. It's one of the flight logs, it was  
 23 on the flight with Clinton when we were  
 24 talking about you landed at a naval base. I  
 25 know you are a pilot, do you know what you

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1 G Maxwell - Confidential  
 2 had to do to get clearance to land at that  
 3 naval base.  
 4 MR. PAGLIUCA: If you need to look  
 5 at something to answer the question, you  
 6 can. If you can't answer the question  
 7 without looking at something just  
 8 indicate such.  
 9 A. Regardless, I wouldn't have any  
 10 knowledge of that.  
 11 Q. Was Sarah Kellen traveling with you  
 12 on the flights you were on with Clinton?  
 13 A. I would have to look at a document.  
 14 I wouldn't know if she was on all of them or  
 15 not. I don't know.  
 16 Q. Do you recall her being on any of  
 17 them?  
 18 A. To the best of my recollection, I  
 19 think she was. I don't recollect exactly  
 20 what flight she was on or not.  
 21 Q. Sarah Kellen was one of the  
 22 co-conspirators, physically, in the  
 23 nonconstitution agreement, is that correct?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. I have never seen the document but  
 3 my understanding, I believe, is that she was.  
 4 Q. Did you ever stay the night ever at  
 5 Les Wexner's house in Ohio, have you ever  
 6 stayed the night there?  
 7 A. In his home in Ohio?  
 8 Q. Yes.  
 9 A. I don't believe I did.  
 10 Q. Are you aware of anybody providing  
 11 Jeffrey with two 12 year old girls as a  
 12 birthday present?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. No.  
 16 Q. Are you aware of anybody ever  
 17 providing Jeffrey with French girls under the  
 18 age of 18 as a birthday present?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. No.  
 22 Q. Do you know whether Jean Luc Brunel  
 23 provided girls under the age of 18 to Jeffrey  
 24 for the purposes of sex?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I am un -- the answer is no, I  
 4 don't know anything about that.  
 5 Q. Did you ever witness Jean Luc  
 6 Brunel bringing girls under the age of 18 to  
 7 any of Jeffrey residences?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I don't recollect Jean Luc coming  
 11 to the house with girls, period.  
 12 Q. Do you, when I say house, I'm  
 13 including the U.S. Virgin Island home.  
 14 Do you recollect Jean Luc Brunel  
 15 bringing foreign girls under the age of 18 to  
 16 the U.S. Virgin Island house?  
 17 A. I don't recollect anything like  
 18 that.  
 19 Q. Do you know how Jeffrey Epstein  
 20 made his money?  
 21 A. No.  
 22 Q. Was Les Wexner or is Les Wexner one  
 23 of his clients?  
 24 A. I have no idea.  
 25 Q. What do you know about the

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1 G Maxwell - Confidential  
 2 relationship between Jeffrey Epstein and Les  
 3 Wexner?  
 4 A. Are you talking today?  
 5 Q. Yes, today.  
 6 A. I have no idea.  
 7 Q. Do they have a business  
 8 relationship?  
 9 A. I have no idea.  
 10 Q. Did they have a business  
 11 relationship during the time that you were  
 12 working for Jeffrey Epstein?  
 13 A. I believe in the '90s when I was  
 14 there they had a business relationship.  
 15 Q. Did they have any other kind of  
 16 relationship?  
 17 MR. PAGLIUCA: Objection to form  
 18 and foundation.  
 19 A. The only relationship I am aware of  
 20 is the business relationship.  
 21 Q. Do you know why Les Wexner sold the  
 22 New York house or gave the New York house to  
 23 Jeffrey, if you know?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. I know nothing about that  
 3 transaction.  
 4 Q. Can you list for me all the girls  
 5 that you have met and brought to Jeffrey  
 6 Epstein's house that were under the age of  
 7 18?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I could only recall my family  
 11 members that were there and I could not make  
 12 a list of anyone else because that list -- it  
 13 never happened that I can think of.  
 14 Q. I'm talking about the time you were  
 15 working for Jeffrey Epstein, can you list all  
 16 girls that you found for Jeffrey Epstein that  
 17 were under the age of 18 to come work for him  
 18 in any capacity?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I didn't find the girls.  
 22 Q. You choose the word.  
 23 MR. PAGLIUCA: If you have a  
 24 question ask it, you don't choose the  
 25 word.

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1 G Maxwell - Confidential  
 2 Q. List all of the girls you met and  
 3 brought to Jeffrey Epstein's home for the  
 4 purposes of employment that were under the  
 5 age of 18?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I've already characterized my job  
 9 was to find people, adults, professional  
 10 people to do the jobs I listed before; pool  
 11 person, secretary, house person, chef, pilot,  
 12 architect.  
 13 Q. I'm asking about individuals under  
 14 the age of 18, not adult persons, people  
 15 under the age of 18.  
 16 A. I looked for people or tried to  
 17 find people to fill professional jobs in  
 18 professional situations.  
 19 Q. So Virginia Roberts was under the  
 20 age of 18, correct?  
 21 A. I think we've established that  
 22 Virginia was 17.  
 23 Q. Is she the -- sorry, go ahead.  
 24 Is she the only individual that you  
 25 met for purposes of hiring someone for

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1 G Maxwell - Confidential  
 2 Jeffrey that was under the age of 18?  
 3 MR. PAGLIUCA: Objection to form  
 4 and foundation. Mischaracterizes her  
 5 testimony.  
 6 A. I didn't hire people.  
 7 Q. I said met.  
 8 A. I interviewed people for jobs for  
 9 professional things and I am not aware of  
 10 anyone aside from now Virginia who clearly  
 11 was a masseuse aged 17 but that's, at least  
 12 that's how far we know that I can think of  
 13 that fulfilled any professional capacity for  
 14 Jeffrey.  
 15 Q. List all the people under the age  
 16 of 18 that you interacted with at any of  
 17 Jeffrey's properties?  
 18 A. I'm not aware of anybody that I  
 19 interacted with, other than obviously  
 20 Virginia who was 17 at this point?  
 21 (Maxwell Exhibit 21, email, marked  
 22 for identification.)  
 23 Q. I'm showing you what's been marked  
 24 as Maxwell 21, it's an email dated January  
 25 21, 2015 from Jeffrey to you. Is that, you

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1 G Maxwell - Confidential  
 2 can take a moment to take a look at it, is  
 3 that a statement that Jeffrey Epstein wrote  
 4 for you to be issued to the press?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. The question was?  
 8 Q. Is this a statement that Jeffrey  
 9 Epstein wrote for you to be issued to the  
 10 press?  
 11 MR. PAGLIUCA: Same objection.  
 12 A. Is there any other emails that you  
 13 have that surround this that would allow me  
 14 to know what -- does this have a context?  
 15 Q. These were produced by your counsel  
 16 so the to extent there are emails that  
 17 surround this, this is what we were given.  
 18 A. Okay. I don't know whether he  
 19 wrote this -- obviously he wrote this and  
 20 sent this to me. I don't know if this is  
 21 post a phone call we had, I can't recollect  
 22 exactly.  
 23 Q. Do you know if this was issued to  
 24 the press, this statement?  
 25 A. The only press statement that was

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1 G Maxwell - Confidential  
 2 issued is the one that you have.  
 3 Q. When the paragraph refers to you  
 4 being in a very long term committed  
 5 relationship with another man, who was that  
 6 other man?  
 7 MR. PAGLIUCA: You don't have to  
 8 answer the question.  
 9 MS. McCAWLEY: I'm asking the  
 10 identity of a witness in a statement she  
 11 is giving.  
 12 MR. PAGLIUCA: She didn't give the  
 13 statement.  
 14 MS. McCAWLEY: Jeffrey is writing  
 15 to her, I'm asking who is he is  
 16 referencing to a long term relationship.  
 17 You are going to refuse to let her  
 18 answer that question.  
 19 MR. PAGLIUCA: Yes.  
 20 MS. McCAWLEY: I would like to  
 21 state for the record he is refusing to  
 22 allow her to identify a potential  
 23 witness in this litigation. So we will  
 24 be back to get the answer to that  
 25 question.

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1 G Maxwell - Confidential  
 2 Q. Do you recall when you were  
 3 traveling with Virginia Roberts that you  
 4 would be responsible for holding her  
 5 passport?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I already testified I don't recall  
 9 traveling with Virginia.  
 10 Q. Do you recall whether Jeffrey  
 11 Epstein when he was traveling with a minor,  
 12 someone under the age of 18, someone would  
 13 hold their passport?  
 14 MR. PAGLIUCA: Object to the form.  
 15 A. I couldn't testify to what Jeffrey  
 16 did or didn't do.  
 17 Q. You never observed him gathering a  
 18 minor's passport and holding it during one of  
 19 the trips you were on?  
 20 A. I don't have a recollection of  
 21 that.  
 22 Q. Are you familiar with a company  
 23 called Hyperion Air Inc.?  
 24 A. I am.  
 25 Q. Is that a company you are

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1 G Maxwell - Confidential  
 2 affiliated with?  
 3 A. No.  
 4 Q. Is that a company that Jeffrey  
 5 owns?  
 6 A. I knew it back in 2001, back when I  
 7 was working. I have no idea what that is  
 8 today.  
 9 Q. What about JEJE, are you familiar  
 10 with that company, JEJE Inc.?  
 11 A. I don't recall it.  
 12 Q. You don't recall?  
 13 A. It vaguely rings a bell. I don't  
 14 remember what it relates to.  
 15 Q. What about J Epstein Virgin Islands  
 16 Foundation, Inc.  
 17 Are you familiar with that company?  
 18 A. No.  
 19 Q. How did J Epstein & Company, Inc.?  
 20 A. Again, I don't recall his business  
 21 names and affiliations.  
 22 Q. How about NES LLC, are you familiar  
 23 with that name?  
 24 A. Again, I think that was one of his  
 25 businesses, but I don't recall.

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1 G Maxwell - Confidential  
 2 Q. Do you know what that business did?  
 3 A. I don't.  
 4 Q. How about New York Strategy Group  
 5 Inc.?  
 6 A. I don't know.  
 7 Q. What about Ghislaine Maxwell  
 8 Company, are you familiar with that company?  
 9 A. I never heard of that.  
 10 Q. Is that a company you are on record  
 11 as being either a board member of or having a  
 12 position of authority in?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I've never heard of the business.  
 16 Q. What negative, unflattering,  
 17 private or potentially embarrassing  
 18 information does Jeffrey Epstein know about  
 19 you?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I imagine none.  
 23 Q. Does he know, does he have any  
 24 knowledge of any illegal activity that you've  
 25 conducted?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation.  
 4 A. If you want to ask Jeffrey  
 5 questions about me, you would have to ask  
 6 him.  
 7 Q. Have you ever been involved in any  
 8 illegal activity in your lifetime?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I can't think of anything I have  
 12 done that is illegal.  
 13 Q. Have you ever been arrested?  
 14 A. I have a DUI in the U.K. a long  
 15 time ago.  
 16 Q. Is that the only arrest you have on  
 17 your record?  
 18 A. Yes.  
 19 Q. I will mark as Maxwell 22 this  
 20 email?  
 21 (Maxwell Exhibit 22, email, marked  
 22 for identification.)  
 23 Q. This is dated January 21, 2015.  
 24 It's from Jeffrey Epstein to you, forwarding  
 25 the Guardian and I would like you to look at

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1 G Maxwell - Confidential  
 2 the chain of emails so you understand the --  
 3 have an appreciation for who is on this.  
 4 It's a three-page document. The bottom of  
 5 the email appears to be a message from, there  
 6 is a -- at the very bottom there is the  
 7 signature block for Ross Gow, who I  
 8 understand is your press agent and above that  
 9 there is a message from a John Swaine to Ross  
 10 Gow.  
 11 Do you see that?  
 12 A. Uh-huh.  
 13 Q. Do you know who John Swaine is?  
 14 A. I do not.  
 15 Q. Above that there is a message from  
 16 Ross Gow to Philip Barden and you and it  
 17 says, so this isn't getting better, latest  
 18 from our chums at the Guardian and above that  
 19 you will see on January 21 an email from you  
 20 where you wrote, See below.  
 21 And right above that chain you will  
 22 see Jeffrey Epstein to you on January 21 and  
 23 his statement to you is, This will now end  
 24 but I think a dismissive statement is okay.  
 25 What did he mean by his statement,

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1 G Maxwell - Confidential  
 2 This will now end?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. I have no idea.  
 6 Q. Did you discuss with him what he  
 7 meant by the statement, This will now end?  
 8 A. I don't recall.  
 9 Q. Was he taking any action to ensure  
 10 that, quote, this will now end?  
 11 A. I have no idea.  
 12 (Maxwell Exhibit 23, email, marked  
 13 for identification.)  
 14 Q. This is an email from, if you look  
 15 at the chain at the top, you will see it's  
 16 from you to Jeffrey on January 27 and the  
 17 email at the bottom of the chain is from  
 18 Jeffrey to you on January 27.  
 19 He states, What happened to you and  
 20 your statement, question mark, question mark.  
 21 And you put at the top, I have not decided  
 22 what to do.  
 23 A. Uh-huh.  
 24 Q. Why was Jeffrey interested in you  
 25 making a statement to the press?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I don't know that he was  
 5 interested. We made a statement and then I  
 6 was being advised to make an additional  
 7 statement and I never did.  
 8 Q. Was Jeffrey communicating with you  
 9 regularly on what additional statement you  
 10 might make?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. No, I've communicated with him very  
 14 little, as little as possible.  
 15 Q. Why did you feel you had to keep  
 16 him informed of statements you were making to  
 17 the press?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I didn't feel I had to.  
 21 Q. Then why you were communicating  
 22 with him about statements you were making to  
 23 the press?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. Insofar as this is the case, it's  
 3 really all about Jeffrey, it's not a case  
 4 about me.  
 5 Q. In 2009, did you direct your  
 6 lawyer, either directly or indirectly, to  
 7 tell Brad Edwards that you were unavailable  
 8 to attend a deposition?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation. And this is a  
 11 privileged communication as I understand  
 12 the question, what someone said or  
 13 didn't say to their lawyer. So don't  
 14 answer the question.  
 15 Q. Can you answer that question  
 16 without revealing a privileged communication?  
 17 A. Can you ask the question again?  
 18 Q. In 2009, did you direct your lawyer  
 19 to tell Brad Edwards that you were  
 20 unavailable to attend a deposition?  
 21 MR. PAGLIUCA: Same instruction.  
 22 Q. Did you make any statement in 2009  
 23 to anybody that you were unavailable to  
 24 attend a deposition?  
 25 A. My mother was sick and I don't

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1 G Maxwell - Confidential  
 2 recall exactly the sequence of events but  
 3 what sequence of events do exist are -- was  
 4 handled by my lawyers.  
 5 Q. What is your understanding of  
 6 Jeffrey Epstein's nonprosecution agreement?  
 7 A. I have no idea.  
 8 Q. Do you have an understanding of the  
 9 co-conspirators listed in the nonprosecution  
 10 agreement?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I have no knowledge of his  
 14 agreement, whatever that is.  
 15 Q. Do you know, you mentioned earlier  
 16 today that Sarah Kellen was one of the listed  
 17 co-conspirators.  
 18 Do you know who the other  
 19 co-conspirators are in the nonprosecution  
 20 agreement?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I do not know.  
 24 Q. What did Jeffrey Epstein tell you  
 25 about the nonprosecution agreement?

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1 G Maxwell - Confidential  
 2 A. I don't think I've ever discussed  
 3 it with him.  
 4 Q. How did you come to learn that  
 5 Sarah Kellen was covered by the  
 6 nonprosecution agreement?  
 7 A. I believe I read it in the press.  
 8 Q. Did you have any discussions with  
 9 Sarah Kellen with about the nonprosecution  
 10 agreement?  
 11 A. I have not had any discussions with  
 12 Sarah.  
 13 Q. When is the last time you spoke to  
 14 Sarah Kellen?  
 15 A. Maybe 2005, 2006 maybe.  
 16 Q. And same with Nadia Marcinkova,  
 17 when is the last time you recall speaking  
 18 with Nadia Marcinkova?  
 19 A. Probably even more time before  
 20 that, maybe -- I've never had communications  
 21 really with Nadia.  
 22 Q. I'm sorry, I didn't hear that.  
 23 A. I never had communications with  
 24 her.  
 25 Q. You were working for Jeffrey at the

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1 G Maxwell - Confidential  
 2 same time Nadia was also working for Jeffrey,  
 3 isn't that correct?  
 4 A. I didn't know what Nadia did for  
 5 Jeffrey so I didn't characterize what her  
 6 relationship or work or not was and I was  
 7 still helping him with his construction  
 8 projects and the like but I never crossed  
 9 paths with Nadia.  
 10 Q. What did you think Nadia was doing  
 11 for Jeffrey?  
 12 A. I have no idea what Nadia was doing  
 13 for Jeffrey.  
 14 Q. Did you observe Nadia at any of  
 15 Jeffrey's houses while you were there?  
 16 A. She was at the house on occasion.  
 17 Q. What would she be doing there?  
 18 A. I have no idea.  
 19 Q. Did you know if she lived at his  
 20 houses?  
 21 A. I have no idea.  
 22 Q. Did you ever go into a bedroom and  
 23 see her belongings at one of the houses?  
 24 A. Not that I recall, no.  
 25 Q. I'm going to mark this as Maxwell

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1 G Maxwell - Confidential  
 2 Exhibit 24?  
 3 (Maxwell Exhibit 24, email, marked  
 4 for identification.)  
 5 Q. You can see at the top of the first  
 6 page which is GM 0001, it's dated January 3,  
 7 2015 from you to the Duke of York.  
 8 Is that Prince Andrew who we  
 9 referred to today?  
 10 A. Yes.  
 11 Q. And can you tell me, it says, Have  
 12 some info. Call me when you have a moment.  
 13 What is redacted there?  
 14 A. I don't recall, I'm sorry.  
 15 Q. Do you know why there is a  
 16 redaction on this document?  
 17 A. You would have to confer with my  
 18 lawyers.  
 19 Q. What did you discuss on that call?  
 20 A. I don't have any specific knowledge  
 21 of that call.  
 22 Q. So the call is being made on  
 23 Saturday, January 3, 2015?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 Q. The document states, it's Saturday  
 3 January 3, 2015. You issued your press  
 4 release on January 2, 2015.  
 5 Were you discussing with Prince  
 6 Andrew the subject of Virginia Roberts during  
 7 these calls?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I don't know if I spoke to him.  
 11 Q. I would like you to turn to GM 0002  
 12 and the bottom chain says Duke of York,  
 13 Saturday January 3, to [REDACTED] re, and he says  
 14 let me know when we can talk. Got some  
 15 specific questions to ask you about Virginia  
 16 Roberts.  
 17 Do you recall having a conversation  
 18 with Prince Andrew about Virginia Roberts in  
 19 or around early January of 2015?  
 20 A. I don't know if we actually spoke.  
 21 Q. Did you ever speak to Prince Andrew  
 22 about Virginia Roberts after you issued your  
 23 statement on January 2, 2015?  
 24 A. I know that we did speak at some  
 25 point but I don't recollect when we spoke.

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1 G Maxwell - Confidential  
 2 Q. What did you talk about?  
 3 A. Just what a liar she is.  
 4 Q. What did he say to you?  
 5 A. What a liar she is.  
 6 Q. Did he tell you why he thought she  
 7 was a liar?  
 8 A. I don't think he told me why she  
 9 was a liar. The substance of everything that  
 10 she said was a lie with regard to him.  
 11 Q. What did you say to him?  
 12 A. She is a liar.  
 13 Q. That was the whole conversation, it  
 14 was you said to him, she is a liar and he  
 15 said to you she say liar and did you discuss  
 16 any of the details about what those lies  
 17 were?  
 18 A. I don't recollect.  
 19 Q. Was that only one conversation you  
 20 had?  
 21 A. I don't recollect. I don't  
 22 recollect actually the conversation but other  
 23 than -- in detail other than we both said she  
 24 was a liar.  
 25 Q. Do you regularly communicate with

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1 G Maxwell - Confidential  
 2 Prince Andrew?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. What do you mean by regularly.  
 6 Q. Do you email with him once a month,  
 7 once every two months or text him or call  
 8 him?  
 9 A. No, we are not in that type of  
 10 regular touch.  
 11 Q. Do you travel with him regularly?  
 12 A. I don't know, I have traveled with  
 13 him. We have traveled together but regularly  
 14 is not a correct characterization.  
 15 Q. Do you travel with him more than  
 16 once a year?  
 17 A. There is no standard. There is no  
 18 set pattern. The answer to that was no.  
 19 Q. Have you ever observed him with any  
 20 underage, any women, female under the age of  
 21 18, interacting, that's not a child or a  
 22 family friend, interacting for the purposes  
 23 of a sexual relationship with that  
 24 individual?  
 25 MR. PAGLIUCA: Objection to the



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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I've never seen Andrew interact in  
 4 any way of that nature.  
 5 Q. Have you ever gone to dinner with  
 6 him with any individual under the age of 18  
 7 that's not a family member or friend of yours  
 8 that is under the age of 18?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. We've been to dinner all the time,  
 12 I am not not sure who is at dinner with us, I  
 13 can't testify to that.  
 14 Q. Has he ever brought a female under  
 15 the age 18 that's not a relative of his --  
 16 A. He has children.  
 17 Q. I said not relatives.  
 18 A. I can't possibly testify to who he  
 19 comes to dinner with, I wouldn't recall.  
 20 Q. To your knowledge, has he ever had  
 21 a relationship with any female under the age  
 22 of 18 for purposes of a romantic relationship  
 23 to your knowledge?  
 24 A. I can't testify to Andrew's  
 25 relationship.

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1 G Maxwell - Confidential  
 2 Q. You haven't observed that?  
 3 A. No.  
 4 Q. Have you talked to Prince Andrew  
 5 about coming to testify at trial in this  
 6 case?  
 7 A. No.  
 8 Q. When was the last time you  
 9 communicated with Leslie Wexner?  
 10 A. 1994, 1995.  
 11 Q. I believe earlier, did you say that  
 12 you -- when is the last time you've been to  
 13 his home in Ohio?  
 14 A. I said -- you asked me if I stayed  
 15 the night.  
 16 Q. I'm asking you a different  
 17 question. When is the last time you have  
 18 been to his home in Ohio?  
 19 A. Roughly the same time, in the  
 20 middle of the '90s sometime, mid '90s.  
 21 Q. Not in the years 2000 to 2002?  
 22 A. Mid '90s.  
 23 Q. Have you ever communicated with any  
 24 representative of Leslie Wexner?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I mean I've been to his -- in the  
 4 mid '90s, I would have communicated with  
 5 people who worked for him.  
 6 Q. Have you communicated with Leslie  
 7 Wexner about this case?  
 8 A. No.  
 9 Q. Have you ever seen a topless female  
 10 at any one of Jeffrey Epstein's properties?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation. You've asked this  
 13 question, by the way, earlier on today.  
 14 A. Again, I testified that there are  
 15 people who from time to time in the privacy  
 16 of a swimming pool have maybe taken a bikini  
 17 top off or something but it's not common and  
 18 certainly when I was at the house I don't  
 19 really recollect seeing that kind of  
 20 activity.  
 21 Q. Have you ever smoked cigarettes?  
 22 A. Yes.  
 23 Q. Have you ever smoked cigarettes  
 24 with Virginia Roberts?  
 25 A. I don't recall smoking cigarettes

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1 G Maxwell - Confidential  
 2 with Virginia Roberts.  
 3 Q. I'm marking this as Maxwell 25.  
 4 (Maxwell Exhibit 25, email, marked  
 5 for identification.)  
 6 Q. I'm showing you what has been  
 7 marked as Maxwell 25.  
 8 This is an email dated January 11,  
 9 2015 at the top?  
 10 Do you see that that from Jeffrey  
 11 to you?  
 12 A. Uh-huh.  
 13 Q. And then below there is an email  
 14 from Philip Barden to you and cc'ing Ross Gow  
 15 on January 11, 2015.  
 16 Do you see that?  
 17 A. Uh-huh.  
 18 Q. It says, Dear Ghislaine, as you  
 19 know I have been working behind the scenes  
 20 and this article comes from that. It helps  
 21 but doesn't answer the VR claims. I will get  
 22 the criminal allegations out. This shows the  
 23 MOS will print truth, not just a VR voice  
 24 piece. We can only make the truth by making  
 25 a statement.

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1 G Maxwell - Confidential  
 2 What did he mean when he said, I  
 3 will get the criminal allegations out, what  
 4 was he referring to?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I have no idea.  
 8 Q. Were there criminal allegations  
 9 about Virginia that either your lawyer or  
 10 press agent were leaking to the press?  
 11 MR. PAGLIUCA: Objection to form  
 12 and foundation.  
 13 A. I have no idea.  
 14 Q. Did you ask him what he meant when  
 15 he said, I will get the criminal allegations  
 16 out?  
 17 A. I don't recollect the conversation.  
 18 Q. Did you direct him to leak to the  
 19 press criminal allegations about Virginia  
 20 Roberts?  
 21 A. I already testified that I have no  
 22 knowledge of what you are asking me.  
 23 Q. Were you copied on this email,  
 24 correct?  
 25 A. I was.

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1 G Maxwell - Confidential  
 2 Q. Did Jeffrey Epstein assist in  
 3 obtaining information about criminal  
 4 allegations relating to Virginia Roberts?  
 5 MR. PAGLIUCA: Objection to form  
 6 and foundation.  
 7 A. I have no recollection.  
 8 Q. Did Alan Dershowitz assist in  
 9 obtaining information regarding criminal  
 10 allegations of Virginia Roberts?  
 11 MR. PAGLIUCA: Objection to form  
 12 and foundation.  
 13 A. I have no knowledge of that.  
 14 Q. Did you ever discuss that with Alan  
 15 Dershowitz?  
 16 A. Discuss what?  
 17 Q. Criminal allegations about Virginia  
 18 Roberts.  
 19 A. I don't believe I have.  
 20 Q. Have you ever discussed allegations  
 21 relating to --  
 22 Q. Do you know if Jeffrey Epstein had  
 23 any relationship with the U.S. government  
 24 either working for the CIA or the FBI in his  
 25 lifetime?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I have no knowledge of that.  
 5 Q. Do you know if Jeffrey Epstein has  
 6 any friends that are in the CIA or FBI?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I have no idea.  
 10 Q. Are you aware of an investigation  
 11 of Jeffrey Epstein in the early '80s relating  
 12 to the SEC?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I have no knowledge of that.  
 16 Q. Are you aware that Jeffrey Epstein  
 17 has told people that he worked for the  
 18 government to recover stolen funds?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I don't recall conversations about  
 22 that.  
 23 Q. Has he ever told that you he worked  
 24 for the U.S. government?  
 25 A. I don't recollect that.

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1 G Maxwell - Confidential  
 2 Q. You don't recollect or has he never  
 3 told you that?  
 4 A. I have no knowledge, I don't  
 5 recollect him telling me he worked for the  
 6 government.  
 7 Q. Does Jeffrey Epstein have any  
 8 affiliation with the Israeli government?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I have no knowledge of that.  
 12 Q. Do you know if he ever performed  
 13 any work for the Israeli government?  
 14 A. I have no knowledge of that.  
 15 Q. Have you ever visited Israel with  
 16 Jeffrey Epstein?  
 17 A. I'm sorry, I don't recollect.  
 18 Q. You've seen the flight logs that I  
 19 provided you today. Are there, during the  
 20 time you worked for Jeffrey Epstein, were  
 21 there times that you flew on commercial  
 22 flights rather than Jeffrey Epstein's planes?  
 23 A. Yes.  
 24 Q. How often did that occur?  
 25 A. Decently.

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1 G Maxwell - Confidential  
 2 Q. Were there other flights that you  
 3 recall flying on with Jeffrey Epstein that  
 4 were on flights that -- where Dave Rogers was  
 5 not the pilot?  
 6 A. Dave Rogers was not always the  
 7 pilot.  
 8 Q. How many planes did Jeffrey Epstein  
 9 have during the time you were with him?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. So you need to give me a date  
 13 range.  
 14 Q. During the time period of 1992  
 15 through when you left your employment which I  
 16 think you said was in 2009?  
 17 A. So in the '90s he had one plane and  
 18 at some point in the 2000s he had two planes  
 19 but I can't testify to anything past 2002,  
 20 2003, what happened to his planes after that.  
 21 Q. Do you know what travel agency, if  
 22 any, Jeffrey would use when he would send  
 23 someone, for example, you or one of his other  
 24 employees on a flight somewhere? Did he use  
 25 a particular travel agency to make those

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1 G Maxwell - Confidential  
 2 arrangements?  
 3 A. I don't recall.  
 4 Q. Were you ever responsible for  
 5 making those arrangements for other  
 6 individuals?  
 7 A. I don't recall making flight  
 8 arrangements.  
 9 Q. Was it a New York travel agent that  
 10 you would use for those arrangements?  
 11 A. Again, we are talking 16, 17, 18  
 12 years. I just don't recall anything to do  
 13 with travel agents.  
 14 Q. Would Jeffrey Epstein ever fly, for  
 15 example, Sarah Kellen on a commercial flight  
 16 to meet you in New Mexico?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I can't testify to that.  
 20 Q. Do you recall a trip where you met  
 21 Sarah Kellen in New Mexico?  
 22 A. No, I don't recall any specific  
 23 trip, no.  
 24 Q. Why would you be sent to New  
 25 Mexico, is there a reason why you would go

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1 G Maxwell - Confidential  
 2 there in the course of the work you were  
 3 doing for Jeffrey?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I was never sent. I had a job to  
 7 do and I would have to go to New Mexico for  
 8 work.  
 9 Q. Would Sarah Kellen assist in that  
 10 project?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. No. The project was largely  
 14 complete, largely complete by the end -- I  
 15 don't remember the dates exactly but it was  
 16 largely complete by the 1990s, 2000s.  
 17 Q. Do you know why Sarah Kellen would  
 18 be going to New Mexico to meet you?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I don't know. She worked for  
 22 Jeffrey.  
 23 MR. PAGLIUCA: I think we are out  
 24 of time, counsel.  
 25 THE VIDEOGRAPHER: It's true.

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1 G Maxwell - Confidential  
 2 MS. McCAWLEY: I will state for the  
 3 record there were questions today that  
 4 remain unanswered because the witness  
 5 has been instructed not to answer those  
 6 questions and we will be raising our  
 7 objections with the court to be able to  
 8 have those questions answered in the  
 9 near future.  
 10 MR. PAGLIUCA: So we are clear, we  
 11 are designating this entire deposition  
 12 as confidential under the protective  
 13 order. That would cover the paralegal  
 14 whose been present as well as the court  
 15 reporter and the videographer and all  
 16 the lawyers in the room.  
 17 THE VIDEOGRAPHER: This concludes  
 18 today's proceedings. We are off the  
 19 record at 6:43 p.m.  
 20 (Time noted: 6:43 p.m.)  
 21  
 22  
 23  
 24  
 25

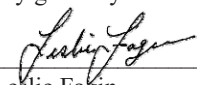

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1  
2 CERTIFICATE  
3  
4  
5 I HEREBY CERTIFY that the witness,  
6 GHISLAINE MAXWELL, was duly sworn by me and  
7 that the deposition is a true record of the  
8 testimony given by the witness.  
9  
10    
11 Leslie Fagin,  
12 Registered Professional Reporter  
13 Dated: April 22, 2016  
14  
15 (The foregoing certification of  
16 this transcript does not apply to any  
17 reproduction of the same by any means, unless  
18 under the direct control and/or supervision  
19 of the certifying reporter.)  
20  
21  
22  
23  
24  
25

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1  
2 ACKNOWLEDGMENT OF DEPONENT  
3  
4 I, \_\_\_\_\_, do hereby  
5 certify that I have read the foregoing pages,  
6 and that the same is a correct transcription  
7 of the answers given by me to the questions  
8 therein propounded, except for the  
9 corrections or changes in form or substance,  
10 if any, noted in the attached Errata Sheet.  
11  
12 GHISLAINE MAXWELL DATE  
13 Subscribed and sworn  
14 to before me this \_\_\_\_\_  
15 day of \_\_\_\_\_, 2016.  
16 My commission expires:  
17  
18 Notary Public  
19  
20  
21  
22  
23  
24  
25

**United States District Court  
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR PROTECTIVE ORDER AND  
TO DIRECT THE DEFENDANT TO DISCLOSE ALL INDIVIDUALS TO WHOM  
DEFENDANT HAS DISSIMINATED CONFIDENTIAL INFORMATION (DE 335)**

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Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this Reply in Support of her Motion for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information (DE 335).

## I. INTRODUCTION

*“The nature of this case concerns highly personal and sensitive information from both parties. In this action, both parties have sought and will seek confidential information in the course of discovery from the other party and from non-party witnesses. Release of such confidential information outside of the litigation could expose the parties to ‘annoyance, embarrassment, [and] oppression and result in significant injury to one or more of the parties’ business or privacy interests.”*

- Defendant, Ghislaine Maxwell, March 2, 2016<sup>1</sup>

Less than six months after representing to this Court that this case involves “highly personal and sensitive information” warranting a broad protective order, Defendant now wants to publicize police reports concerning Ms. Giuffre - most of them from when she was a child, some of them concerning her being raped when only 14 years. Defendant’s challenge to Ms. Giuffre’s confidentiality designation is without merit, and it is for improper purposes. Therefore, it should be denied.

Ms. Giuffre moved to maintain her confidentiality of highly sensitive documents. They are police reports involving Ms. Giuffre, including two police reports describing Ms. Giuffre as *fourteen-year-old victim of rape*. Other police reports show her to be the victim of other crimes, including domestic violence. Defendant should not be allowed to make these police reports public, nor disseminate them to third parties. Defendant’s Response brief is devoid of any argument to allow her to make these documents public, and completely devoid of any case law.

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<sup>1</sup> DE 38 at 1.

Instead, Defendant mischaracterizes the police reports at issue. For example, in her “Factual Background,” what Defendant characterizes as a “simulated sex act” for which Ms. Giuffre “cried rape,” actually is a police report as follows:

“I then had [REDACTED] get off of [REDACTED]. I observed that [REDACTED] was very intoxicated, and she was unable to stand on her legs. She was unable to crawl . . . .Based on [REDACTED] intoxicated condition, a [sic] ambulance was called to transport her to [REDACTED] to check on her condition. I then met with [REDACTED] and his mother. I advised [REDACTED] of his Miranda rights . . . . Upon arrival, at the E.R., I met with [REDACTED] who stated that while enroute to the E.R. she was conducting a head to toe evaluation when the patient stated that she had to urinate. [REDACTED] was assisting [REDACTED] remove her panties when she noticed grass and twig particles in the crotch area of [REDACTED] panties as well as a small amount of blood, an unknown clear substance, and a substance which appeared to be semen. She also saw abrasions on [REDACTED] buttocks. ”

*See* GM 00790-801.

To be clear, Defendant will be able to use this report in these proceedings – if she can prove it relevant and otherwise admissible. Indeed, under the protective order, she is permitted to share it with witnesses. Thus, the confidentiality designation made by Ms. Giuffre merely prevent Defendant from running to the press with these reports, which is, of course, what she seeks to do.<sup>2</sup>

As is in some of her other briefs, Defendant fails to cite a single case supporting her position. Nor does she respond in any way to the case law advanced by Ms. Giuffre in the instant motion. Instead, Defendant says that the police report documenting Ms. Giuffre’s rape while a minor has her name redacted. Of course, such a redaction does Ms. Giuffre little good when Defendant and her cohorts distribute it to the press - the identity of the victim in the police report will presumably be supplied by Defendant. Indeed, Defendant and/or her joint defense partners have already made it known to the media that this very police report concerns Ms. Giuffre, *see*

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<sup>2</sup> This plan was admitted by her joint defense partner, Alan Dershowitz, in his baseless Motion to Intervene (DE 362).

Defendant's brief at p. 5, which is why Ms. Giuffre's counsel had to respond to the media inquiry about it in the first place. A redacted name does nothing to protect Ms. Giuffre's identity when Defendant is the one leaking the report to the press.

Since Ms. Giuffre filed her motion for a Protective Order, Defendant's joint defense partner, Alan Dershowitz, has also made distorted representations to the Court and asks, without standing, for this Court to strip away designations made under its order so that he, too, can take confidential litigation materials to the press.<sup>3</sup> As the adverse testimonial evidence piles up against Defendant,<sup>4</sup> it appears she and Dershowitz are planning another media blitz in an attempt to discredit and defame Ms. Giuffre.

The Court is aware that a mountain of testimonial evidence, from multiple witnesses, firmly establishes Defendant operated as convicted pedophile Jeffrey Epstein's procurer of underage girls. The Court is also aware that, as things stand today, all of this testimony is under

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<sup>3</sup> *Id.* Ms. Giuffre will be filing an opposition to Dershowitz's motion to intervene shortly.

<sup>4</sup> *See* McCawley Decl. at Composite Exhibit 1, Figueroa June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103 (Figueroa testified that Plaintiff told him about threesomes with Defendant and Epstein which included the use of strap-ons); and Vol. 2 at 200 (Figueroa testified that Defendant called him inquiring if he had found any other girls for Epstein); Johanna Sjoberg's May 18, 2016 Dep. Tr. at 8-9, 13, 33-35, 142-143 (testifying that Defendant recruited her for sex with Epstein under the guise of answering phones, a job that lasted one day, because her second day Defendant asked her to start giving massages, and it soon made it clear that Sjoberg's purpose was to bring Epstein to orgasm so Defendant didn't have to all of the time); Rinaldo Rizzo's June 10, 2016 Dep. Tr. at 52-60 (Defendant's friend's house manager, through tears, described how Defendant tried to force a 15 year old Swedish girl to have sex with Epstein through threats and stealing her passport); Juan Alessi's June 1, 2016 Dep. Tr. at 28, 52-54 (Epstein's house manager, testified that Defendant was one of the people who procured the over 100 girls he witnessed visit Epstein, and that he had to clean Defendant's sex toys); Lynn Miller's May 24, 2016 Dep. Tr. at 115 (testified that Defendant became Ms. Giuffre's "new momma"); Detective Joseph Recarey's June 21, 2016 Dep. Tr. at 29-30 (the detective who led the investigation of Epstein, testified that Defendant procured underage girls for Epstein); David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36; *see also* Exhibit 2 Excerpted Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570 and 1589 (Epstein's pilot testified that the passenger listed on his flight log bearing the initials – GM – was in fact Ghislaine Maxwell and Rodgers was the pilot on at least 23 of the flights in which Defendant flew with Plaintiff), etc.



this Court's Protective Order, and cannot be disclosed to the public. For instance, Ms. Sjoberg's testimony of how Defendant lured her from her school to have sex with Epstein under the guise of answering phones cannot be given to the media<sup>5</sup>. Similarly, Mr. Rizzo's testimony about how Defendant took the passport of a 15-year-old Swedish girl and threatened her when she refused to have sex with Epstein cannot be given to the media.<sup>6</sup> Likewise Mr. Alessi's testimony about how Defendant brought girls over for Epstein is also under a confidentiality order.<sup>7</sup> So too with Mr. Figueroa's testimony about how Defendant would call him to bring over underage girls and how Defendant and Epstein would have threesomes with Ms. Giuffre.<sup>8</sup> Defendant's own admission of how she and Epstein had threesomes with multiple different girls whose names she can't even remember<sup>9</sup> also has been designated as confidential.<sup>10</sup>

Ms. Giuffre has never sought to challenge Defendant's sweeping confidentiality designations, which Defendant has freely employed to hide the voluminous incriminating evidence in this case. Defendant, on the other hand, appears to be operating from different premises. Knowing that the documentary and testimonial evidence in this case are fatal to all her purported defenses, Defendant appears to be planning a preemptive and one-sided media strike to try to discredit Ms. Giuffre.<sup>11</sup> Indeed, a recent brief before this Court makes clear that Defendant

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<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> See McCawley Dec. at Exhibit 3, Maxwell Dep. Tr. at 59:3-17 (July 22, 2016).

<sup>10</sup> Interestingly despite that admission, Defendant has the gall to publically call Ms. Giuffre, a longtime-married, mother of three, a "sexually permissive woman."

<sup>11</sup> Tellingly, nowhere in her brief does Defendant mention to the court why she wants to make these documents public.

is not acting alone in this effort, but is teaming up with Alan Dershowitz<sup>12</sup> to ask this Court to release additional documents (but, naturally, none of the condemning documents Defendant has marked confidential).

Part of Defendant's frantic attempt to discredit Ms. Giuffre is to publicly reveal that she was sexually assaulted as a 14 year old, yet announce to the world that she "cried rape,"<sup>13</sup> and to humiliate her family (including three minor children) by publicizing she was the victim of domestic abuse in 2015. As the Court saw during its *in camera* review, Defendant and Mr. Gow previously exchanged emails about how to leak information to the press to discredit Ms. Giuffre by saying that she "cried rape" when she was 14 (GM\_00577):

---

**From:** Ross Gow [REDACTED]  
**Sent:** Tuesday, February 24, 2015 3:36 AM  
**To:** G Max; Philip Barden  
**Subject:** VR cried rape - prior case dismissed as prosecutors found her 'not credible'

Ghislaine

Some helpful leakage...

Defendant has been liberal with her own confidentiality designations. In fact, Defendant has even requested that significant parts of this Court's Orders be treated as "confidential." For example, when this Court issued its June 20, 2016, Order directing Defendant to turn over documents that she improperly claimed as "privileged," Defendant redacted the public version of the Order to erase all reference to her extensive communications with her boyfriend, convicted pedophile Jeffrey Epstein. While seeking to publicize confidential information about Ms. Giuffre, Defendant apparently does not want the world not know that she continues to maintain

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<sup>12</sup> Defendant has even filed an Affidavit from Dershowitz's attorney which states that there is a common interest between them. Curiously, the name of Dershowitz's attorney, as is the name of Dershowitz himself, is redacted in the public version of these briefs. *See* (DE 387).

<sup>13</sup> As the Court saw during its *in camera* review, Defendant and Mr. Gow exchanged emails about how to discredit her by saying that she "cried rape" when she was 14.

her close relationship with Jeffrey Epstein and plotted with him to defame Ms. Giuffre.

Defendant has also chosen to designate as confidential the fact that she has a DUI conviction,<sup>14</sup>

so that her own criminal activity for which she has been convicted is not in the media.

## II. DISCUSSION

Ms. Giuffre has not challenged any of Defendant's self-serving confidentiality designations - designations that do not protect legitimate interests (such as trademark or copyright information) but rather conceal shameful aspects of Defendant's life, including all the testimony regarding the specifics on just how she recruited underage girls for sex with convicted pedophile Jeffrey Epstein. But now Defendant challenges Ms. Giuffre's designation of a police report involving rape as confidential. The Court should not countenance the one-sided attempt at gamesmanship by Defendant (and Dershowitz), who use confidentiality designations as a shield to block release of information about Epstein's sex trafficking while attempting to strike down Ms. Giuffre designations about such things as being sexually assaulted while a child.

Given the extremity of the position she is staking out, it is unsurprising that Defendant's entire brief cites no case law, and presents no argument to refute Ms. Giuffre's case law. The material Defendant seeks to send to the press is exactly the type of information that Protective Orders are meant to protect, and this Court should deem these documents as confidential.

### **A. The Court can Order that these Documents be Made Confidential Either Under the Existing Protective Order or Independent of the Protective Order**

Ms. Giuffre explained in detail why her application to the Court is timely filed under the Protective Order [DE 62], and will not burden the Court with a recitation of such details and arguments. The simple fact remains that these materials should remain confidential, and

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<sup>14</sup> See McCawley Dec. at Exhibit 4, Maxwell Dep. Tr. at 390:13-15 (April 22, 2016).

Defendant cannot articulate one legitimate purpose for making them public. Accordingly, they should remain confidential under the existing protective order.

In addition, even if the Court were to find, for some reason, that the motion is untimely under the Protective Order, or that these documents do not come within the ambit of the existing protective Order, this Court still clearly has the inherent power to determine that these documents are confidential and should be kept under seal. Rule 26(c) of the Federal Rules of Civil Procedure permits a district court to “make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense” upon a showing of good cause. In her moving brief, Ms. Giuffre has established “good cause” for these documents to remain and/or be deemed confidential by the Court. Therefore, the Court should grant the instant motion independent of the language of the Protective Order (drafted by Defendant).

As this Court will remember, the Court twice allowed the parties to make suggested redactions to the public versions of its Orders (*see, e.g.*, DE 135). While the redactions were agreed upon by the parties, they were solely at Defendant’s request. This is a case concerning sex abuse of minors, brought by a minor victim of sex abuse. If any civil case cries out for protective treatment, it is this one.

As the Defendant explained to this Court back in March of 2016, the materials in this case, and the materials at issue in the instant motion, are sensitive in nature, and therefore fall squarely into the categories of material over which courts routinely grant protection. *C.F. Strategic Growth Intern., Inc. v. Remote MDX, Inc.*, 2007 WL 3341522, at \*3 (S.D.N.Y., Nov. 9, 2007) (Sweet, J.) (“To the extent that RMDX is concerned about the sensitive nature of the

redacted information, those concerns should be allayed by the September 13, 2007 Stipulated Protective Order”).

In this case, unlike Maxwell who has refused to produce documents, Ms. Giuffre has produced a number of documents including turning over personal, embarrassing documents that bear no relation to the claim at issue in this case. Indeed, Defendant has procured other documents with the same issues, including those documenting her being raped as a 14 year old and being beaten by her husband, the father of her three minor children. These are the types of documents for which confidentiality treatment during pre-trial proceedings is appropriate.

**B. Defendant’s Challenge of these Materials (and her Joint Defense Partner’s Challenge of Other Materials) Frustrate this Court’s Ability to Resolve the Claim at Issue, and is a Waste of Judicial Economy**

Defendant and her joint defense partner, Dershowitz, for no apparent reason than their media smear campaign, are now tying-up this Court’s docket, asking the Court to engage in a document-by-document determination of confidentiality of the discovery in this case. This is a waste of judicial resources, as it in no way furthers the resolution of the claim before this court. *Cf. In re Terrorist Attacks on September 11, 2001*, 454 F.Supp.2d 220, 223 (S.D.N.Y.2006) (“document-by-document confidentiality determinations . . . would impose an enormous burden upon the Court and severely hinder its progress toward resolution of pretrial matters”).

Moreover, should Defendant and her joint defense partner prevail in these baseless efforts, Ms. Giuffre would be forced to apply to the Court to lift the confidentiality designations from parallel discovery materials in this case that refute what Defendant and her proxies say in the media (materials that are present in abundance in this case). None of this motion practice aids in the resolution of the claim before this Court, but would merely frustrate that resolution. Accordingly, the Court should grant Ms. Giuffre’s motion.

**C. Details Concerning Ms. Giuffre’s Rape as a 14 Year Old Are Only in The Public Realm Because, Upon Information and Belief, Defendant and/or Her Joint Defense Partners Previously Fed Them to The Media**

Defendant incorporated into her Response brief the media inquiry about Ms. Giuffre’s sexual assault and Sigrid McCawley’s response made on Ms. Giuffre’s behalf. This exchange illustrates exactly why Ms. Giuffre’s motion should be granted. The Court has seen the email from Ross Gow, Defendant’s public relations agent, informing her of the strategy of leaking the information to the press for the purpose of discrediting Ms. Giuffre by falsely claiming that she “cried rape” as a 14 year old.<sup>15</sup> Unsurprisingly, the media was then tipped off to Defendant’s false and twisted version of the events, to which Ms. McCawley made a response. The Court has seen Defendant’s play book in action. Significantly, there is not a single word in Defendant’s brief refuting the fact that she challenges this confidentiality designation for improper purposes.

**III. CONCLUSION**

Ms. Giuffre was a child victim of sexual abuse, which is undisputed. Upon Defendant’s own motion, this Court entered a Protective Order in this matter. Ms. Giuffre has shown good cause for confidentiality of the materials at issue. Therefore, the Court should hold that these materials are confidential. This Court should also direct Defendant to disclose all the individuals to whom she has already disseminated the material at issue, and direct the Defendant to recall such material forthwith.

DATED: August 23, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz  
Sigrid McCawley (Pro Hac Vice)

---

<sup>15</sup> See GM\_00577, above.

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---

<sup>16</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on August 23, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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**EXHIBIT A**

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

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

GHISLAINE MAXWELL,

Defendant.

\_\_\_\_\_ /

250 N. Australian Avenue,  
Suite 1400  
West Palm Beach, Florida 33401  
Friday, September 9, 2016  
8:35 a.m. - 2:08 p.m.

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Taken before Darline M. West,  
Registered Professional Reporter, Notary Public  
in and for the State of Florida At Large,  
pursuant to Notice of Taking Deposition filed  
by the Plaintiff in the above cause.

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 (Appearances continued on the next page)

Page 3

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 9  
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 11 RYAN KICK - Video Technician  
 12 DARLINE MARIE WEST - Court Stenographer  
 13  
 14 - - -  
 15  
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 2 Ms. Maxwell on about  
 3 July 18th, 2009  
 4 Plaintiff's Exhibit JE6 E-mail string between 185  
 5 Jeffrey Epstein and  
 6 Ms. Maxwell on about  
 7 March 25th, 2011  
 8 Plaintiff's Exhibit JE7 Transcription of a 189  
 9 string of e-mails  
 10 between Jeffrey  
 11 Epstein and Ms.  
 12 Maxwell in about May  
 13 of 2011  
 14 Plaintiff's Exhibit JE8 E-mail that Jeffrey 191  
 15 Epstein sent to  
 16 Maxwell on  
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 23 Southern District of  
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 deposition  
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<p>1 QUESTIONS MARKED BY THE REQUEST OF COUNSEL:</p> <p>2 PAGE/LINES</p> <p>3 Page 69, lines 24 through 25</p> <p>4 Page 70, lines 2 through 16</p> <p>5 (At the request of Mr. Pagliuca)</p> <p>6 Page 280, lines 4 through 6</p> <p>7 (At the request of Mr. Cassell)</p> <p>8 - - -</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 J. Epstein - Confidential</p> <p>2 MR. GOLDBERGER: And Jack Goldberger on</p> <p>3 behalf of the witness, Jeffrey Epstein.</p> <p>4 And on the phone is?</p> <p>5 MR. WEINBERG: Martin Weinberg by</p> <p>6 telephone on behalf of the witness,</p> <p>7 Jeffrey Epstein.</p> <p>8 VIDEO TECHNICIAN: Will the court</p> <p>9 reporter please swear the witness.</p> <p>10 THE COURT REPORTER: Okay. Sir, could</p> <p>11 you raise your right hand.</p> <p>12 Do you swear to tell the truth, the</p> <p>13 whole truth, and nothing but the truth?</p> <p>14 THE WITNESS: Yes, ma'am.</p> <p>15 THEREUPON,</p> <p>16 JEFFREY EDWARD EPSTEIN,</p> <p>17 called as a witness on behalf of the Plaintiff</p> <p>18 herein, having been first duly sworn, was examined</p> <p>19 and testified as follows:</p> <p>20 DIRECT EXAMINATION</p> <p>21 BY MR. CASSELL:</p> <p>22 Q. All right. Sir, you understand that my</p> <p>23 client is Ms. Virginia Roberts Giuffre?</p> <p>24 MR. GOLDBERGER: I'm sorry,</p> <p>25 Mr. Cassell. Before we start, let -- let me</p>
Page 7	Page 9
<p>1 J. Epstein - Confidential</p> <p>2 P R O C E E D I N G S</p> <p>3 - - -</p> <p>4 VIDEO TECHNICIAN: We are now on the</p> <p>5 record. This begins videotape No. 1 in the</p> <p>6 deposition of Jeffrey Epstein in the matter</p> <p>7 of Giuffre versus Maxwell.</p> <p>8 Today is September 9th, 2016. The time</p> <p>9 is 8:35 a.m. This deposition is being taken</p> <p>10 at 250 North Australian Avenue, West Palm</p> <p>11 Beach, Florida. The videographer is</p> <p>12 Ryan Kick. The court reporter is</p> <p>13 Darline West. We both represent Magna Legal</p> <p>14 Services.</p> <p>15 Will counsel and all parties present</p> <p>16 state their appearance and whom they</p> <p>17 represent.</p> <p>18 MR. CASSELL: I can begin. My name's</p> <p>19 Paul Cassell, and I represent Miss Virginia</p> <p>20 Giuffre.</p> <p>21 MS. MCCAWLEY: Sigrid McCawley with</p> <p>22 Boies, Schiller &amp; Flexner on behalf of</p> <p>23 Virginia Giuffre.</p> <p>24 MR. PAGLIUCA: Jeff Pagliuca appearing</p> <p>25 on behalf Gwen Maxwell.</p>	<p>1 J. Epstein - Confidential</p> <p>2 just discuss something on the record.</p> <p>3 I understand there's a protective order</p> <p>4 in place on this case concerning</p> <p>5 confidentiality in this depositions. And as</p> <p>6 I understand the protective order, either</p> <p>7 party can designate the -- the proceeding as</p> <p>8 confidential, and I understand counsel for</p> <p>9 Miss Maxwell is going to do that in this</p> <p>10 case.</p> <p>11 MR. PAGLIUCA: That's correct. I'm</p> <p>12 designating this deposition as confidential.</p> <p>13 Any other stips?</p> <p>14 MR. GOLDBERGER: Huh?</p> <p>15 MR. PAGLIUCA: Any other stips?</p> <p>16 MR. GOLDBERGER: No. We're good for</p> <p>17 now.</p> <p>18 MR. PAGLIUCA: Okay.</p> <p>19 BY MR. CASSELL:</p> <p>20 Q. All right. Sir, you understand I'm an</p> <p>21 attorney representing Miss Roberts -- Virginia</p> <p>22 Roberts Giuffre?</p> <p>23 A. I've been advised by my counsel to assert</p> <p>24 my rights under the Fifth Amendment of the United</p> <p>25 States Constitution as to any and all questions that</p>

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1 J. Epstein - Confidential  
 2 could result in a waiver of my Constitutional  
 3 privileges. I understand that one of the basic  
 4 functions of the Fifth Amendment, according to the  
 5 United States Supreme Court, is to protect all  
 6 citizens, including even innocent persons who  
 7 otherwise might be ensnared by ambiguous  
 8 circumstances. On the advice of counsel, I assert my  
 9 rights under the Fifth Amendment and respectfully  
 10 decline to answer your question.  
 11 MR. CASSELL: Mr. Goldberger, it's your  
 12 position that having him acknowledge who my  
 13 client is creates a realistic risk of  
 14 incrimination?  
 15 MR. GOLDBERGER: We're not going to  
 16 debate at this deposition whether the  
 17 implication of the Fifth Amendment privilege  
 18 is proper or not proper. We are simply  
 19 asserting the privilege. And if that needs  
 20 to be discussed or litigated somewhere else,  
 21 we'll be happy to do so, so...  
 22 BY MR. CASSELL:  
 23 Q. If I refer to Virginia today, I want you to  
 24 understand that I'll be referring to my client,  
 25 Miss Virginia Roberts Giuffre.

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1 J. Epstein - Confidential  
 2 Is that an acceptable way to proceed today,  
 3 sir?  
 4 A. As I stated before in response to my -- to  
 5 your earlier question, I am asserting my  
 6 constitutional right not to respond to that question.  
 7 MR. GOLDBERGER: This would be a good  
 8 opportunity, I think, to kind of discuss  
 9 ground rules for the implication of the  
 10 Fifth Amendment --  
 11 MR. CASSELL: All right.  
 12 MR. GOLDBERGER: -- as we proceed in  
 13 this deposition. We've advised you off the  
 14 record and it's not any surprise to anyone  
 15 that Mr. Epstein fully intends to invoke  
 16 Fifth Amendment privileges to all of your  
 17 questions.  
 18 We can -- as we answer your questions,  
 19 and we'll be happy to answer all your  
 20 questions, we can use the full invocation  
 21 that we did in response to your first  
 22 question, we can use the invocation that we  
 23 just did in response to your second  
 24 question, or we simply can say, Fifth  
 25 Amendment, with the understanding that the

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1 J. Epstein - Confidential  
 2 answer would be edited and -- and would be  
 3 the full answer that Mr. Epstein gave to the  
 4 first question. Really, your choice on that  
 5 as to how you would like to proceed.  
 6 MR. CASSELL: Yeah. Whatever you think  
 7 would be the fastest. I want to get through  
 8 this.  
 9 MR. GOLDBERGER: Okay.  
 10 MR. CASSELL: And so, obviously, we'll  
 11 be objecting to many of these invocations  
 12 already.  
 13 MR. GOLDBERGER: Sure.  
 14 MR. CASSELL: I think that these are  
 15 improper invocations, but if we're going to  
 16 litigate that elsewhere, that certainly is  
 17 one way to proceed.  
 18 MR. GOLDBERGER: Okay. So is it fair  
 19 to say we've reached an agreement that if  
 20 Mr. Epstein simply says, the Fifth, the  
 21 answer that would be part of the record for  
 22 any time these proceedings are used anywhere  
 23 would be the full invocation Mr. Epstein  
 24 used in answer to the first question?  
 25 MR. CASSELL: Yes. And I would at the

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1 J. Epstein - Confidential  
 2 -- I would then raise an objection to the  
 3 nonresponsive portion of the invocation,  
 4 such as, for example, a reference to  
 5 "innocent persons." It seems to me that's  
 6 not necessary for him to take the Fifth.  
 7 MR. GOLDBERGER: Okay.  
 8 MR. CASSELL: As long as we have your  
 9 position and our position both stated all  
 10 the time, that -- that seems like the most  
 11 expeditious way to proceed.  
 12 MR. WEINBERG: One other matter, a  
 13 preliminary matter, which is that we would  
 14 reserve our right to particularize a full  
 15 basis based on the record of this case, the  
 16 record of the CVARC -- CVRA case,  
 17 representations that have been made by you  
 18 and Mr. Edwards regarding Mr. Epstein and  
 19 his potential criminal liability and your  
 20 intention to seek to rescind his  
 21 non-prosecution agreement, the admissions  
 22 taken on the absence of the meaningful  
 23 Statute of Limitations, in terms of our  
 24 spelling out, if the Fifth Amendment is  
 25 challenged in regards to any response by

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1 J. Epstein - Confidential  
 2 Mr. Epstein, for instance, a response to  
 3 whether he even recognizes the name of your  
 4 client, in the event you choose to challenge  
 5 the essential applicability of the  
 6 long-standing Fifth Amendment privilege.  
 7 MR. CASSELL: I'm going to object to  
 8 Mr. Weinberg defending the deposition in  
 9 addition to Mr. Goldberg. My  
 10 understanding of the rules --  
 11 MR. GOLDBERGER: Goldberger. It's  
 12 Goldberger.  
 13 MR. CASSELL: I'm sorry. I apologize.  
 14 Mr. Goldberger.  
 15 It seems to me, the standard is one  
 16 lawyer for one witness. And Mr. Goldberger  
 17 is a very capable lawyer, so it seems to me  
 18 Mr. Weinberg should not be allowed to  
 19 participate by making objections.  
 20 MR. PAGLIUCA: And for the record, I  
 21 have no objection to Mr. Epstein simply  
 22 saying, Fifth Amendment in response to any  
 23 questions and understand that that answer  
 24 would incorporate all of the first answer  
 25 that Mr. Epstein gave in this deposition.

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1 J. Epstein - Confidential  
 2 MR. GOLDBERGER: Thank you.  
 3 BY MR. CASSELL:  
 4 Q. Sir, you've been deposed many times before,  
 5 true?  
 6 A. Fifth.  
 7 Q. You understand the rules regarding the  
 8 deposition today, true?  
 9 A. Fifth.  
 10 Q. You have legal counsel here today to  
 11 provide advice to you, should it be necessary at any  
 12 point, true?  
 13 A. True.  
 14 Q. Is there anything, including any physical  
 15 conditions or ailments, that would prevent you from  
 16 giving truthful testimony today?  
 17 A. Fifth.  
 18 Q. Please state your full name.  
 19 A. Jeffrey Edward Epstein.  
 20 Q. Without disclosing where you may have lived  
 21 in the past, where do you currently reside?  
 22 A. Fifth.  
 23 Q. What state are you a citizen of?  
 24 A. Can you clarify the question?  
 25 Q. Yeah. What state do you consider yourself

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 2 to be a citizen of?  
 3 A. Fifth.  
 4 Q. You understand that the case caption on the  
 5 subpoena you received is Virginia Giuffre versus  
 6 Ghislaine Maxwell?  
 7 A. Fifth.  
 8 Q. You know the Defendant in this case,  
 9 Ghislaine Maxwell, true?  
 10 A. Fifth.  
 11 Q. You first met Maxwell in the early 1990s;  
 12 isn't that true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 MR. CASSELL: Let me make sure I  
 17 understand.  
 18 What's the objection to form?  
 19 MR. PAGLIUCA: The question is vague.  
 20 BY MR. CASSELL:  
 21 Q. When did you first meet Ms. Maxwell?  
 22 A. Fifth.  
 23 Q. Where did you first meet Ms. Maxwell?  
 24 A. Fifth.  
 25 Q. What were the circumstances surrounding

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1 J. Epstein - Confidential  
 2 your first meeting of Maxwell?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Could you repeat the  
 6 question?  
 7 BY MR. CASSELL:  
 8 Q. What were the circumstances surrounding  
 9 your first meeting of Maxwell?  
 10 MR. PAGLIUCA: Same objection.  
 11 THE WITNESS: Fifth.  
 12 MR. CASSELL: And when you say "form," you  
 13 believe that the question that I just asked is  
 14 vague?  
 15 MR. PAGLIUCA: It is vague. I don't  
 16 understand what "circumstances" means. It  
 17 lacks foundation, in that there hasn't been  
 18 an establishment of any time or place of  
 19 meeting of Ms. Maxwell or even that he knows  
 20 Ms. Maxwell under the circumstances of this  
 21 deposition.  
 22 MR. CASSELL: Right. But you  
 23 understand there is evidence in the record  
 24 from which I would have a good faith basis  
 25 for believing that he has, in fact, met

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1 J. Epstein - Confidential  
 2 Ms. Maxwell?  
 3 MR. PAGLIUCA: I'm not going to debate  
 4 what you have a good faith for believing or  
 5 not. My -- my objection stands.  
 6 MR. CASSELL: I'm just confused about  
 7 how there could be a lack of foundation for  
 8 whether they have met, when your client  
 9 testified under oath that she had interacted  
 10 with Epstein repeatedly.  
 11 MR. PAGLIUCA: That's my objection.  
 12 MR. CASSELL: All right.  
 13 BY MR. CASSELL:  
 14 Q. Just so we're clear, the -- the question --  
 15 let me just -- I may have asked this before, but I  
 16 want to make sure we haven't messed -- messed --  
 17 missed anything.  
 18 What were the circumstances surrounding  
 19 your first meeting with Maxwell?  
 20 MR. PAGLIUCA: Same objection. Form  
 21 and foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. And whenever I use the term "Maxwell"  
 25 today, I wanted it to be clear that I'm referring to

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1 J. Epstein - Confidential  
 2 the Defendant in this action, Ghislaine Maxwell.  
 3 Would you consider yourself currently to be  
 4 the boyfriend of Ms. Maxwell?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Have you ever been a boyfriend of  
 10 Ms. Maxwell?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. It's true that at some point you had an  
 16 intimate relationship with Miss Maxwell?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. You were in a long-term relationship with  
 22 Maxwell from the early '90s through -- through at  
 23 least 2005, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. How long did your long-term relationship  
 5 with Maxwell continue?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. You are currently in a relationship with  
 11 Maxwell, true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. You currently have a joint defense  
 17 agreement with Maxwell, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. You currently have a common interest  
 23 agreement with Maxwell, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. You understand that your interests and  
 5 Maxwell's interests are aligned in this case?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. What is your understanding of Maxwell's  
 11 interest in this case?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. What is your understanding of your interest  
 17 in this case?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Since the start of 2015, you have  
 23 communicated with Maxwell about how she can best  
 24 respond to allegations made by Virginia?  
 25 MR. PAGLIUCA: Object to form and

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 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Without going into the substance of any  
 6 communications you have had, you've communicated with  
 7 Maxwell since December 30th, 2014, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 MR. CASSELL: Can I understand what the  
 12 objection is to form on that particular  
 13 question?  
 14 MR. PAGLIUCA: Do you want to have the  
 15 reporter read it back?  
 16 MR. CASSELL: I can just give it to  
 17 you.  
 18 MR. PAGLIUCA: Sure.  
 19 MR. CASSELL: "Without going into any  
 20 substance of any communications that you  
 21 have had, you have communicated with Maxwell  
 22 since December 30th, 2014, true?"  
 23 MR. PAGLIUCA: It's a leading question.  
 24 That's a form objection.  
 25 MR. CASSELL: All right. So can we

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 2 just --  
 3 MR. WEINBERG: And I would add a  
 4 further objection, which is to the extent  
 5 that any conversations which were pursuant  
 6 to a common interest agreement, you would  
 7 assert the attorney-client privilege as well  
 8 as the Fifth Amendment.  
 9 MR. GOLDBERGER: Right. So that  
 10 objection we're making as to attorney-client  
 11 privilege in no way waives the Fifth  
 12 Amendment privilege that has been raised to  
 13 the question.  
 14 MR. CASSELL: Mr. Weinberg, since  
 15 you're participating over my objection, can  
 16 you confirm that there is a joint defense  
 17 agreement between your client and  
 18 Ms. Maxwell?  
 19 MR. PAGLIUCA: I'm going to object to  
 20 any interrogation of Mr. Weinberg. He's not  
 21 been noticed for a deposition, he's not  
 22 under oath, and he's not present here.  
 23 MR. CASSELL: I'm just trying to  
 24 understand the objection so that I can avoid  
 25 it in any future questions.

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1 J. Epstein - Confidential  
 2 What was the nature of your objection  
 3 regarding common interest and joint defense  
 4 agreement, Mr. Weinberg?  
 5 MR. WEINBERG: It was direct status  
 6 asserting the attorney-client privilege as  
 7 well as the Fifth Amendment. I'm making no  
 8 representations regarding the existence of  
 9 any agreement.  
 10 MR. CASSELL: All right. You also  
 11 objected to my last question based on  
 12 foundation. What was the foundation  
 13 objection?  
 14 MR. PAGLIUCA: There's multiple  
 15 foundational issues. We don't know the  
 16 source of any information that would be  
 17 responsive to the question. It could  
 18 contain hearsay and speculation. You know,  
 19 all of these questions, frankly, lack  
 20 foundation under the circumstances here.  
 21 Frankly, I don't believe that there -- it  
 22 will be a good faith basis for most of the  
 23 questions. I don't believe that most of  
 24 these questions will be supported by any  
 25 independent evidence.

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1 J. Epstein - Confidential  
 2 This is simply an exercise for you,  
 3 Mr. Cassell, to use leading questions to try  
 4 to obtain some adverse inference and  
 5 advantage in this litigation, when you know  
 6 that this witness is going to blanketly  
 7 assert a Fifth Amendment privilege.  
 8 Frankly, I see no point in actually  
 9 having this deposition since all of these  
 10 issues are going to need to be litigated  
 11 before the court before we can actually have  
 12 a determination of what Mr. Epstein may or  
 13 may not testify about, so...  
 14 MR. CASSELL: My specific question,  
 15 though, is -- the question I asked Epstein  
 16 was, "Without going into the substance of  
 17 any communications that you have had, you  
 18 have communicated with Maxwell since  
 19 December 30th, 2014?"  
 20 Since your client has testified under  
 21 oath that she did indeed have communications  
 22 with Epstein since December 30th, 2014, I  
 23 can't understand why that question would  
 24 lack a foundation.  
 25 MR. PAGLIUCA: Well, I -- I've made my



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1 J. Epstein - Confidential  
 2 record. It -- it is lacking in foundation.  
 3 MR. CASSELL: All right.  
 4 BY MR. CASSELL:  
 5 Q. Without going into the substance of any  
 6 communications that you have had, you have  
 7 communicated with Maxwell since September 21st, 2015,  
 8 true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. How many communications have you had with  
 14 Ms. Maxwell since December 30th, 2014?  
 15 A. Fifth.  
 16 Q. What methods of communications have you  
 17 used when talking to Maxwell in the last two years?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. What e-mail accounts have you used in your  
 23 communications with Maxwell?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. What e-mail accounts has Maxwell used in  
 5 her communications with you?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. What is your cell phone number, sir?  
 11 A. Fifth.  
 12 Q. How many cell phones do you have?  
 13 A. Fifth.  
 14 Q. Please provide all of the cell phone  
 15 numbers that you currently have access to?  
 16 A. Fifth.  
 17 Q. Please provide all the cell phone numbers  
 18 that you had access to in 2000 and 2001?  
 19 A. Fifth.  
 20 Q. Please provide all of the e-mail accounts  
 21 that you had access to in 2000 and 2001.  
 22 A. Fifth.  
 23 Q. Please provide all of the e-mail accounts  
 24 that, to your knowledge, Ms. Maxwell had access to in  
 25 2000 and 2001.

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. You are a registered sex offender, correct?  
 7 A. Fifth.  
 8 Q. In previous depositions, you have stated  
 9 that you are a registered sex offender, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. In June 2008, in open court, you pled  
 15 guilty to two Florida State felonies, correct?  
 16 A. Fifth.  
 17 Q. You were sworn to tell the truth in those  
 18 public proceedings, true?  
 19 A. Fifth.  
 20 Q. In open court, what did you testify that  
 21 you had done?  
 22 A. Fifth.  
 23 Q. And in my previous question, I'm referring  
 24 to the plea proceeding that was in about June  
 25 of 2008. Did you understand my question?

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1 J. Epstein - Confidential  
 2 A. Yes.  
 3 Q. In open court, what things did you say in  
 4 that hearing?  
 5 A. Fifth.  
 6 Q. Did you tell the truth in that hearing?  
 7 A. Fifth.  
 8 Q. Did you tell the court that you accepted  
 9 responsibility for those crimes?  
 10 A. Fifth.  
 11 Q. Were you accepting responsibility for those  
 12 crimes?  
 13 A. Fifth.  
 14 Q. Why were you accepting responsibility for  
 15 those crimes?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Did you apologize to the victim of your  
 21 crimes?  
 22 A. Fifth.  
 23 Q. One of the crimes to which you pled guilty  
 24 in open court was soliciting a minor for  
 25 prostitution, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Please describe how the solicitation to  
 7 which you pled guilty was accomplished.  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 MR. CASSELL: Can you tell me what the form  
 12 objection was to that?  
 13 MR. PAGLIUCA: Please tell me how the  
 14 solicitation was accomplished?  
 15 MR. CASSELL: Yes.  
 16 MR. PAGLIUCA: Okay. Well, you're  
 17 asking for a legal definition from this lay  
 18 witness as to solicitation, how it was  
 19 accomplished. I don't know what that means.  
 20 Your question is vague, it's ambiguous, it  
 21 calls for a legal conclusion. It's also  
 22 lacking in foundation.  
 23 MR. CASSELL: Because?  
 24 MR. PAGLIUCA: Well, as I understand  
 25 it, your position is that he pled guilty to

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 2 made-up crimes that didn't have a factual  
 3 basis and this was a conspiracy between  
 4 Mr. Epstein and the U.S. Attorney's Office  
 5 to avoid prosecution for federal criminal  
 6 charges, which is the basis for your  
 7 challenge to -- in the CVRA litigation, as I  
 8 understand your pleadings. So I'm not  
 9 exactly sure how you can actually have a  
 10 good faith basis for asking that question,  
 11 given your position in writing.  
 12 MR. CASSELL: All right. You've  
 13 mischaracterized our position. And I  
 14 imagine we'll have to discuss that later.  
 15 MR. PAGLIUCA: Sure.  
 16 MR. CASSELL: Since there were  
 17 objections to form, let me just try to ask a  
 18 series of questions, then, to avoid the form  
 19 objection.  
 20 BY MR. CASSELL:  
 21 Q. How did you accomplish the crime that you  
 22 pled guilty to?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. What did you do that led you to plead  
 4 guilty?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. What was your understanding of the legal  
 10 crime to which you were pleading guilty?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. What was your understanding of what you  
 16 were admitting in open court that day?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Now, with regard to the two crimes that you  
 22 pled guilty, where did those two crimes take place?  
 23 A. Fifth.  
 24 Q. And I suppose there could be a form  
 25 objection to that question being compound. So to

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1 J. Epstein - Confidential  
 2 obviate any issue, I'm going to ask you, was one of  
 3 the victims in that case a girl who was 14 years old  
 4 who we could identify by initials S.G.?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 MR. CASSELL: And Mr. Goldberger, is -- if  
 9 we refer to the victim in -- I believe it was  
 10 Count 1 or at least one of the accounts by S.G.  
 11 Is that an acceptable way to proceed rather  
 12 than putting her name into the record, or could  
 13 I write her name out and provide that to you and  
 14 your client? What would you -- I want to avoid  
 15 putting the names of 14-year-old sex victims  
 16 into the transcript here.  
 17 MR. GOLDBERGER: It's your deposition.  
 18 MR. CASSELL: All right. So what I'm  
 19 going --  
 20 BY MR. CASSELL:  
 21 Q. Sir, you understand when I use the term  
 22 "S.G." who I'm referring to, true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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 2 MR. CASSELL: And what I'm going to do is  
 3 write the name of the victim and provide that to  
 4 Mr. Goldberger and to Mr. Pagliuca now, so that  
 5 when I use the term "S.G.," both Mr. Goldberger  
 6 and Mr. Pagliuca will have that.  
 7 MR. GOLDBERGER: Thank you.  
 8 MR. CASSELL: And if you -- and then we  
 9 should also provide that, of course, now to  
 10 Mr. Epstein, so that he'll --  
 11 MR. GOLDBERGER: He's -- he's seen it.  
 12 MR. CASSELL: Okay.  
 13 And then I'm going to do the same thing with  
 14 the second witness. I'm going to refer to her  
 15 by the initials [REDACTED]  
 16 And I'm providing -- Let the record will  
 17 reflect I'm providing the -- the full name  
 18 of [REDACTED] to Mr. Goldberger, Mr. Pagliuca, and  
 19 Mr. Epstein has seen it as well.  
 20 BY MR. CASSELL:  
 21 Q. Please describe how you accomplished the  
 22 solicitation of S.G.  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Isn't it true, sir, that the solicitation  
 4 of S.G. occurred in your Florida -- or I should say,  
 5 Palm Beach mansion?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Who was regularly in your Palm Beach  
 11 mansion at the time of the solicitation of [REDACTED]?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 MR. CASSELL: Could I understand the  
 16 form objection to that question?  
 17 MR. PAGLIUCA: "Who was regularly  
 18 in..."  
 19 Again, these are vague questions with  
 20 no time frame, which is the form problem of  
 21 your questions.  
 22 BY MR. CASSELL:  
 23 Q. Sir, with regard to my questions, I want  
 24 you to understand that the time frame is the same  
 25 time frame for the crime to which you pled guilty.

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Please describe how you accomplished the  
 4 solicitation of [REDACTED]  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Where was the solicitation of S.G.  
 10 accomplished?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Where was the solicitation of [REDACTED]  
 16 accomplished?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Isn't it true, sir, that the solicitation  
 22 of [REDACTED] occurred in your Palm Beach mansion?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 With regard to that time frame, who was  
 3 regularly in your house?  
 4 MR. PAGLIUCA: Form and foundation  
 5 objection.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Sir, isn't it true that when you solicited  
 9 [REDACTED] for sex, Maxwell was regularly in your Palm  
 10 Beach mansion?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Sir, isn't it true that when you solicited  
 16 S.G. for sex, Maxwell was regularly in your Palm  
 17 Beach mansion?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 And here, Mr. Cassell, there is no  
 21 evidence that Ms. Maxwell was quote,  
 22 unquote, regularly in the Palm Beach mansion  
 23 during the time frame that you're talking  
 24 about. And so there is no good faith basis  
 25 to ask that question.

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 2 MR. CASSELL: I disagree with your  
 3 understanding of the record, but we'll take  
 4 that up at a later time.  
 5 BY MR. CASSELL:  
 6 Q. How old was S.G. when you solicited her for  
 7 sex?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. How old was [REDACTED] when you solicited her for  
 13 sex?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Isn't it true, sir, that S.G. was under the  
 19 age of 18 when you solicited her for sex?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Indeed, sir, isn't it true that S.G. was  
 25 under the age of 16 when you solicited her for sex?

1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. How old was [REDACTED] when you solicited her for  
 7 sex?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Isn't it true, sir, that [REDACTED] was under the  
 13 age of 18 when you solicited her for sex?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Sir, isn't it true you arranged for [REDACTED] to  
 19 come to your Palm Beach mansion for sexual purposes?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Sir, isn't it true that you arranged for  
 25 S.G. to come to your Palm Beach mansion for sexual

1 J. Epstein - Confidential  
 2 purposes?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Sir, isn't it true that you had sex with  
 8 S.G. at your Palm Beach mansion?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Sir, isn't it true that you had sex with  
 14 [REDACTED] at your Palm Beach mansion?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Sir, it required logistical arrangements  
 20 for A.H. to come to your Palm Beach mansion, true?  
 21 MR. PAGLIUCA: Object to the form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Sir, it required logistical arrangements

1 J. Epstein - Confidential  
 2 for S.G. to come to your Palm Beach mansion, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Who helped make the logistical arrangements  
 8 for S.G. to come to your Palm Beach mansion?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Who arranged -- who made -- I'm sorry. Let  
 14 me strike that. Let me start over.  
 15 Who made the logistical arrangements for  
 16 S.G. to come to your Palm Beach mansion?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Sir, isn't it true that Maxwell made the  
 22 logistical arrangements or assisted with the  
 23 logistical arrangements for S.G. to come to your Palm  
 24 Beach mansion?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 And, again, there is no good faith  
 4 basis to ask this question. There are no  
 5 facts supporting any inference from that  
 6 question, Mr. Cassell.  
 7 MR. CASSELL: I disagree with your  
 8 reading of the record on that.  
 9 BY MR. CASSELL:  
 10 Q. You can answer.  
 11 A. Fifth.  
 12 Q. Isn't it true that Maxwell helped to make  
 13 the arrangements for ██████ to come to your Palm Beach  
 14 mansion either directly or indirectly?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 And, again, there is no evidence  
 18 suggesting that that occurred with  
 19 Ms. Maxwell on being involved, and there is  
 20 no good faith basis to ask that question.  
 21 BY MR. CASSELL:  
 22 Q. Mr. Epstein, Mr. Pagliuca just said there  
 23 was no good faith basis for me to ask that last  
 24 question.  
 25 It's true, sir, that you could give us a

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1 J. Epstein - Confidential  
 2 very significant good faith basis for me asking that  
 3 question, isn't it?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. In fact, at that time, Maxwell was  
 9 regularly at your Palm Beach mansion, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation, and asked and answered. Same  
 12 objections.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Who was running your Palm Beach mansion in  
 16 2005?  
 17 MR. PAGLIUCA: Object to form.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Who was running your Palm Beach mansion in  
 21 2006?  
 22 MR. PAGLIUCA: Object to form.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Who was running your Palm Beach mansion in

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1 J. Epstein - Confidential  
 2 2000?  
 3 MR. PAGLIUCA: Object to form.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Who was running your Palm Beach mansion in  
 7 2001?  
 8 MR. PAGLIUCA: Object to form.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Sir, isn't it true that Ms. Maxwell was  
 12 running your Palm Beach mansion in 2000?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 Again, there's no evidence to suggest  
 16 Ms. Maxwell was running anything.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Mr. Epstein, there is lots of evidence to  
 20 suggest that Ms. Maxwell was running your home from  
 21 1999 through about 2006, true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation. Argumentative.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Sir, Miss Maxwell was running your Palm  
 4 Beach mansion in 2001, true?  
 5 MR. PAGLIUCA: Object -- same  
 6 objections that I've raised before. This is  
 7 asked and answered.  
 8 MR. CASSELL: With regard to 2001 asked  
 9 and answered?  
 10 MR. PAGLIUCA: I think so.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Sir, Ms. Maxwell was running your Palm  
 14 Beach mansion in 2002, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Sir, Ms. Maxwell was running your Palm  
 20 Beach mansion in 2003, true?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Sir, Miss Maxwell was running your Palm

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1 J. Epstein - Confidential  
 2 Beach mansion in 2004, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Sir, Ms. Maxwell was running your Palm  
 8 Beach mansion in 2005, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Sir, Ms. Maxwell was running your Palm  
 14 Beach mansion in 2006, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Who had access to the financial accounts  
 20 for your Palm Beach mansion in 2005?  
 21 A. Fifth.  
 22 Q. Sir, isn't it true that Ms. Maxwell had  
 23 access to the financial accounts for your Palm Beach  
 24 mansion in 2005?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 And, again, there's no evidence to  
 4 suggest that Ms. Maxwell had access to  
 5 financial accounts of Mr. Epstein in 2005.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Ms. Maxwell did indeed have access to some  
 9 of your financial accounts in 2005, true, sir?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 MR. GOLDBERGER: Mr. Cassell, can we  
 14 just take a 30-second break? I think I have  
 15 a logistical problem when I -- when I  
 16 connected Mr. Weinberg. I used a line that  
 17 was on service. So, I mean, give me two  
 18 seconds.  
 19 MR. CASSELL: All right. And we're  
 20 just going to confer for a moment, if that's  
 21 all right.  
 22 MR. GOLDBERGER: Thank you.  
 23 VIDEO TECHNICIAN: Off the record at  
 24 9:04 a.m.  
 25 (A recess was taken.)

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1 J. Epstein - Confidential  
 2 VIDEO TECHNICIAN: On the record at  
 3 9:10 a.m.  
 4 MR. GOLDBERGER: Thank you for the  
 5 break.  
 6 BY MR. CASSELL:  
 7 Q. Sir, who did you talk to during the break?  
 8 A. Fifth.  
 9 MR. GOLDBERGER: And attorney-client.  
 10 MR. CASSELL: But you believe there's a  
 11 good faith basis for him to say what was just  
 12 discussed would be incriminating?  
 13 MR. GOLDBERGER: Objection's been  
 14 raised. Privileged has been invoked.  
 15 MR. CASSELL: All right.  
 16 BY MR. CASSELL:  
 17 Q. Without going into the substance of any  
 18 communications, who did you speak to during the  
 19 break?  
 20 A. Fifth.  
 21 MR. GOLDBERGER: Attorney-client.  
 22 Again, we're raising attorney-client  
 23 privilege without waiving any Fifth  
 24 Amendment privileges.  
 25 MR. CASSELL: Understood.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. You know who Alfredo Rodriguez is, sir,  
 4 true?  
 5 A. Fifth.  
 6 Q. Who is Alfredo Rodriguez?  
 7 A. Fifth.  
 8 Q. Alfredo Rodriguez was involved in some  
 9 household management issues in your Palm Beach  
 10 mansion in 2005, true?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. What did Alfredo Rodriguez do for you in  
 16 2005?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Who did Alfredo Rodriguez report to in  
 22 2005?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Sir, isn't it true that Alfredo Rodriguez  
 4 reported to Maxwell in 2005?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 There's no evidence to suggest that he  
 8 reported to Ms. Maxwell.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Who is Sarah Kellen?  
 12 A. Fifth.  
 13 Q. You know Sarah Kellen, don't you?  
 14 A. Fifth.  
 15 Q. What did Sarah Kellen do for you at your  
 16 Palm Beach mansion?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Did Alfredo Rodriguez work for you in 2005?  
 22 A. Fifth.  
 23 Q. How many years did Alfredo Rodriguez work  
 24 for you?  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. Sarah Kellen reported to Maxwell, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 There's no evidence to suggest that  
 6 Miss Kellen reported to Miss Maxwell.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Mr. Epstein, you could give us lots of  
 10 evidence that Sarah Kellen reported to Maxwell, true?  
 11 MR. PAGLIUCA: Object to form.  
 12 Foundation. Argumentative.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Sarah Kellen and Ghislaine Maxwell both  
 16 assisted you in the solicitation of S.G., true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 And, again, there's no evidence to show  
 20 that Miss Maxwell participated in the  
 21 solicitation of anybody.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Please give us all the evidence that  
 25 Maxwell participated in the solicitation of minors.

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Sarah Kellen and Ghislaine Maxwell both  
 7 assisted in the solicitation of [REDACTED] true?  
 8 MR. PAGLIUCA: Obj c to form and  
 9 foundation.  
 10 Again, there is no evidence to suggest  
 11 that that's true.  
 12 And, Mr. Cassell, if you have some good  
 13 faith basis and you want to put it on the  
 14 record, that's fine. I have the Palm Beach  
 15 Police Department reports here. We deposed  
 16 Detective Racari. You know, as well as I  
 17 do, that there's no evidence to suggest that  
 18 Ms. Maxwell was involved with [REDACTED] at all.  
 19 MR. CASSELL: I move to strike the  
 20 speaking objections. They're improper in  
 21 this deposition. And there's a time and a  
 22 place to put on both your point of views on  
 23 these issues and, of course, our point of  
 24 view as well.  
 25 MR. PAGLIUCA: Well, that's fine. You

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 2 know, if we can understand that my form and  
 3 foundation objection encompasses what you're  
 4 deeming as speaking objections, I can  
 5 certainly truncate this and just make my  
 6 form and foundation objections.  
 7 MR. CASSELL: My understanding of the  
 8 proper procedure is, you should object on  
 9 form and foundation unless I ask for further  
 10 clarification. That's all you need to make  
 11 the record.  
 12 MR. PAGLIUCA: Okay. And that form and  
 13 foundation objection, then, would include my  
 14 position that there's no good faith basis to  
 15 be asking these questions; is that correct?  
 16 MR. CASSELL: That's correct. That  
 17 would be your position. And of course, our  
 18 position would be to the contrary.  
 19 MR. PAGLIUCA: I understand. I'm just  
 20 trying to make sure that we're not waiving  
 21 anything, and I'm happy just to --  
 22 MR. CASSELL: Sure.  
 23 MR. PAGLIUCA: -- simply to object to  
 24 form and foundation, preserving any  
 25 objections I have to the questioning and the

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 2 process of the proceeding. Fair?  
 3 MR. CASSELL: You would be preserving,  
 4 obviously, a form objection and a foundation  
 5 objection.  
 6 MR. PAGLIUCA: Sure. I guess the  
 7 questions then becomes what does that mean.  
 8 MR. CASSELL: Right.  
 9 MR. PAGLIUCA: So I can keep objecting,  
 10 as I am, or we can have some agreement. But  
 11 why don't we keep going and we'll see what  
 12 happens.  
 13 MR. CASSELL: Right. And I -- it would  
 14 be my position that anything beyond form and  
 15 foundation should be stricken.  
 16 MR. PAGLIUCA: Okay.  
 17 MR. CASSELL: Unless you can -- and  
 18 that's -- that's the way to proceed.  
 19 (Plaintiff's Exhibit JE1, Transcript of the  
 20 deposition of Ms. Maxwell taken on April 22nd, 2016  
 21 was marked for identification.)  
 22 BY MR. CASSELL:  
 23 Q. All right. Sir, I want to hand you a  
 24 document, which I'm document I'm going to mark as JE1  
 25 for Jeffrey Epstein 1. And I'll represent and

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 2 provided a copy to both Mr. Goldberger and  
 3 Mr. Pagliuca. I represent that this is a transcript  
 4 of the deposition of Ms. Maxwell taken on April 22nd,  
 5 2016.  
 6 You have that document in front of you,  
 7 sir?  
 8 A. Yes.  
 9 Q. If I could ask you to flip to page 100.  
 10 And since there are two sets of numbers, this would  
 11 be the smaller set of numbers up on the, for example,  
 12 the top of the page. These -- these are four pages  
 13 per page. And page 100. I'd like to direct your  
 14 attention to page 100, line 8. Actually, I'm sorry,  
 15 page 100, line 10.  
 16 Do you see where I am, sir?  
 17 A. Yes.  
 18 Q. On line 10 there is a question: "Did  
 19 Jeffrey -- was it Jeffrey's preference to start a  
 20 massage with sex?"  
 21 Do you see that question, sir?  
 22 A. Yes.  
 23 Q. And then if we skip over two lines where  
 24 there's a form and foundation objection, we go to  
 25 line 14 where there is an answer given by

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 2 Ms. Maxwell.  
 3 Do you see that answer?  
 4 A. Yes.  
 5 Q. The answer is, "I think you should ask that  
 6 question of Jeffrey."  
 7 Do you see that answer?  
 8 A. Yes.  
 9 Q. So following up on Ms. Maxwell's  
 10 suggestion, I'm going to ask you the same question.  
 11 Was it your preference to start a massage  
 12 with sex?  
 13 A. Fifth.  
 14 Q. It is true that your preference was to  
 15 start a massage with sex?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. I don't know that I completely finished the  
 21 question. So let me just re-ask it.  
 22 It is true that your preference was to  
 23 start a massage with sex, correct?  
 24 MR. PAGLIUCA: Objection to form and  
 25 foundation.

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 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. To your knowledge, when she was deposed on  
 5 April 22nd, 2016, Maxwell knew that your preference  
 6 was to start a massage with sex, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. It is true that you directed Maxwell to  
 12 recruit girls under the age of 18 who would have sex  
 13 with you all under the guise of providing a massage,  
 14 correct?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. One of the girls under the age of 18 with  
 20 whom you had massages starting with sex was Virginia,  
 21 true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25



1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Maxwell has been present many times when  
 4 you have had massages starting with sex, true?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. All right. Now, I want to go in the same  
 10 exhibit, a little further in at page 146.  
 11 All right. On page 146, line 22, do you  
 12 see line 22 on page 146?  
 13 A. Yes.  
 14 Q. And do you see a question there that reads,  
 15 "So would Virginia be brought on trips that were for  
 16 the purpose of work and decorating the house?"  
 17 Do you see that question?  
 18 A. Yes.  
 19 Q. And then do you see following on  
 20 immediately the answer from Ms. Maxwell: "Like I  
 21 said, I never worked with her, but you would have to  
 22 ask Jeffrey what he brought her on the trip for."  
 23 Do you see that answer?  
 24 A. Yes.  
 25 Q. And so I represent to you that that's an

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 2 Virginia there for sexual purposes?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Maxwell was fully aware that Virginia was  
 8 in New Mexico for sexual purposes, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Can you think of any other purpose which an  
 14 attractive 17-year-old girl would be on your property  
 15 at that time, sir?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Maxwell knew there was no other purpose for  
 21 Virginia being there at that time other than sex,  
 22 true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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 2 answer from Ms. Maxwell, and will you understand that  
 3 as I ask further questions with regard to this  
 4 transcript?  
 5 A. Yes.  
 6 Q. So following up on Ms. Maxwell's direction,  
 7 I would like to ask you, why did you bring -- bring  
 8 Virginia on the trip to New Mexico?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. You did bring Virginia on a trip to New  
 14 Mexico, true, sir?  
 15 MR. PAGLIUCA: Object to foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Why did you bring Virginia on your trips  
 19 with you?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. With regard to the New Mexico trip that  
 25 we're discussing here, isn't it true that you brought

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 2 BY MR. CASSELL:  
 3 Q. Is there anyone else I can talk to besides  
 4 you, Virginia, and Maxwell to give information about  
 5 why Virginia was at your ranch in New Mexico?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. There is no one else I can talk to you  
 11 besides you, Virginia, and Maxwell to get exact  
 12 information about why Virginia was at your ranch in  
 13 New Mexico, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Let's go now to page -- actually, let me  
 19 ask one quick question while I'm thinking about it,  
 20 or I'll come back to that in a moment.  
 21 Let's go to page 196. You see on line 3 of  
 22 196 you see a question: "What has Jeffrey told you  
 23 about Virginia Roberts?"  
 24 Do you see that, sir?  
 25 A. Yes.

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2 Q. And then there's an answer in line 5. Do  
3 you see that?  
4 A. Yes.  
5 Q. The answer is that "She is a liar."  
6 Do you see -- is -- I represent to you that  
7 that is Ms. Maxwell stating that you said Virginia  
8 Roberts is a liar.  
9 Is that accurate testimony from  
10 Ms. Maxwell?  
11 A. Fifth.  
12 Q. On line 6, that's not accurate testimony  
13 from Ms. Maxwell, is it?  
14 MR. PAGLIUCA: Object to form and  
15 foundation.  
16 THE WITNESS: Sorry. Repeat the  
17 question.  
18 BY MR. CASSELL:  
19 Q. It is not accurate testimony what we see on  
20 line 5 there, is it?  
21 A. You said, "line 6," I believe, sir.  
22 Q. I'm sorry. Let me --  
23 A. Sorry.  
24 Q. Yeah. Let's --  
25 So you see a question on line 3, correct,

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1 J. Epstein - Confidential  
2 sir?  
3 A. Yes.  
4 Q. And the question on line 3 is, "What has  
5 Jeffrey Epstein told you about Virginia Roberts?"  
6 That's the question there?  
7 A. Yes.  
8 Q. And on line 5 there's an answer from  
9 Ms. Maxwell that "She is a liar."  
10 Do you see that answer?  
11 A. Yes.  
12 Q. That answer is not accurate testimony, is  
13 it, sir?  
14 MR. PAGLIUCA: Object to form and  
15 foundation.  
16 THE WITNESS: Fifth.  
17 BY MR. CASSELL:  
18 Q. When Ms. Maxwell gave that testimony, she  
19 well knew that Virginia was not a liar, true?  
20 MR. PAGLIUCA: Object to form and  
21 foundation.  
22 THE WITNESS: Fifth.  
23 BY MR. CASSELL:  
24 Q. Going now to line 6 there is a question,  
25 "What does he base that on?"

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2 Do you see that question?  
3 A. Yes.  
4 Q. And then skipping over a form and  
5 foundation objection, on line 9 we see an answer from  
6 Maxwell, "You would have to check with him."  
7 Do you see that?  
8 A. That's incomplete, but, yes.  
9 Q. And then the sentence carries on, "I can  
10 tell you why I think she is a liar. I'm happy to do  
11 that."  
12 Do you see the rest of that?  
13 A. Yes.  
14 Q. But I want to focus in on the first part of  
15 that sentence, "You would have to check with him."  
16 Do you see that answer?  
17 A. Yes.  
18 Q. And that answer, you understand in context  
19 to be a request from Maxwell that we check with you?  
20 Do you understand that?  
21 MR. PAGLIUCA: Object to form and  
22 foundation.  
23 THE WITNESS: Fifth.  
24 BY MR. CASSELL:  
25 Q. So I would like to check with you now.

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1 J. Epstein - Confidential  
2 What do you base your assessment of  
3 Ms. Roberts' credibility on?  
4 A. Fifth.  
5 Q. It's true, sir, that Virginia is highly  
6 credible, isn't it?  
7 MR. PAGLIUCA: Object to form and  
8 foundation.  
9 THE WITNESS: Fifth.  
10 BY MR. CASSELL:  
11 Q. When Virginia has said you were a sex  
12 trafficker, that's a true statement, right, sir?  
13 MR. PAGLIUCA: Object to form and  
14 foundation.  
15 THE WITNESS: Fifth.  
16 BY MR. CASSELL:  
17 Q. When Virginia has said that you had  
18 sexually abused her, that's a true statement, isn't  
19 it, sir?  
20 MR. PAGLIUCA: Object to form and  
21 foundation.  
22 THE WITNESS: Fifth.  
23 BY MR. CASSELL:  
24 Q. And when Virginia said Maxwell sexually  
25 abused her, you know that to be a true statement as

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1 J. Epstein - Confidential  
 2 well, don't you?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Virginia has told the truth about you using  
 8 Maxwell to recruit girls for you to sexually abuse,  
 9 true, sir?  
 10 MR. PAGLIUCA: Objection to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Please give us all the information that you  
 15 have regarding how credible Virginia is.  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Please give us all information you have  
 21 about Virginia's credibility on issues relating to  
 22 sex abuse.  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Please give us all information you have  
 4 showing that Virginia is credible about allegations  
 5 she's made against you.  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Please give us all the information you have  
 11 about how Virginia is credible with regard to her  
 12 allegations against Maxwell.  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Is there anybody else that I could check  
 18 with besides you to follow up on Ms. Maxwell's  
 19 suggestion of obtaining information about Virginia's  
 20 credibility with regard to sexual abuse by you?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Sir, it's true that the only one who knows

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1 J. Epstein - Confidential  
 2 about threesomes between you, Maxwell, and her would  
 3 be the three of you, correct?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. And when I refer -- refer to "a threesome"  
 9 in today's deposition, will you understand that I'm  
 10 referring to sexual activity among three people  
 11 occurring essentially simultaneously?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. What is your understanding of the term  
 17 "threesome"?  
 18 A. Fifth.  
 19 Q. Without regard to any conduct that you may  
 20 or not have undertaken in the past, what do you  
 21 understand the word "threesome" to mean?  
 22 A. Fifth.  
 23 Q. Let's now go to page 197 of the transcript.  
 24 Oh, I'm sorry. Actually, let's go to the very bottom  
 25 of page 196.

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 2 Do you see line 25 on page 196?  
 3 A. Yes.  
 4 Q. And the question is: "That's all he said  
 5 about Virginia?"  
 6 Do you see that question?  
 7 A. I don't see a question mark, do you?  
 8 Q. On line 2 of page 197?  
 9 A. Yes.  
 10 Q. And so this is a reference back to line 24  
 11 on page 196. Do you see line 24 on page 196?  
 12 A. Yes.  
 13 Q. And the answer there from Maxwell is, "All  
 14 he" -- that is Epstein in context -- "told me that  
 15 she is a liar."  
 16 Do you see that answer? Do you see the  
 17 answer there on line 24?  
 18 A. Yes.  
 19 Q. That is not accurate testimony, is it, sir?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. In fact, you told Ms. Maxwell that you were  
 25 very concerned that people would learn the truth

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1 J. Epstein - Confidential  
 2 about your activities with Virginia, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. In fact, both you and Ms. Maxwell were very  
 8 concerned that people would learn the truth about  
 9 Virginia's allegations, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. And you and Ms. Maxwell undertook a plan at  
 15 that point to try and undercut Virginia's  
 16 credibility, true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 Can you mark those for me, Reporter,  
 20 those last three questions? Thank you.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. I'm sorry. On page 197, line 3, there's an  
 24 answer, "We went through all the lies that you have  
 25 sold to the papers and sold in general, and we have

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 2 analyzed her lies and your lies and your  
 3 inappropriate behavior in detail."  
 4 Do you see that answer?  
 5 A. Yes.  
 6 Q. That is not a fair and accurate recounting  
 7 of your conversation with Maxwell, is it?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. In fact, the two of you were not worried  
 13 about the lies that Virginia was telling, but the  
 14 truthful statements -- let me strike that.  
 15 In fact, you were not concerned in any way  
 16 about any lies Virginia was telling because she was  
 17 not lying, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. You were concerned that Virginia was  
 23 telling the truth, weren't you?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. You never denied to Maxwell that you had  
 5 sexual relations with Virginia, did you?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. And in fact, Maxwell well knew that you had  
 11 sexual relations with Virginia because she had been  
 12 with you when you were having sexual relations with  
 13 Virginia?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Let's go now to page 217 of the transcript.  
 19 If you look at line 23 on page 217, do you  
 20 see a question, "Is it an obvious -- who did lead her  
 21 up to Jeffrey's room while you were talking to her  
 22 mother?"  
 23 Do you see that question?  
 24 A. Yes.  
 25 Q. And I'll represent to you that the "her" in

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1 J. Epstein - Confidential  
 2 that question is a reference to Virginia.  
 3 Do you understand that to be the question?  
 4 A. Yes.  
 5 Q. And if we go over onto the next page, then,  
 6 we see, "Answer: You would have to ask Virginia. I  
 7 don't know if she was led up to his room."  
 8 Do you see that answer?  
 9 A. Yes.  
 10 Q. There's actually another person that we  
 11 could ask, apart from Virginia, who would know who  
 12 led her up to your room; isn't that true, sir?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. The first time you met Virginia, where did  
 18 you meet her?  
 19 A. Fifth.  
 20 Q. Isn't it true that the first time you met  
 21 virgin what was in your massage room in your Palm  
 22 Beach mansion?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Isn't it true that Maxwell led Virginia up  
 4 to your Palm Beach mansion massage room the first  
 5 time you met her?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. You saw Maxwell bringing Virginia up to  
 11 your room, true, sir?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. Isn't it true that it was standard  
 17 operating procedure for Maxwell to bring underage  
 18 girls up to your room?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Isn't it true that it was standard  
 24 operating procedure for Maxwell to bring underage  
 25 girls up to your room for you to sexually abuse?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Isn't it true that Maxwell's sworn  
 7 testimony is inaccurate when she says she didn't  
 8 bring Virginia up to your room?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Isn't it true that Maxwell was perjuring  
 14 herself when she said she didn't know who brought  
 15 Virginia up to your room?  
 16 MR. PAGLIUCA: Object to form  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Let's go now to page 229 of the transcript,  
 21 line 11.  
 22 Do you see the question there, "So not the  
 23 first time she came but the second time she came or  
 24 the third time or any time she came, did you ever  
 25 participate in a massage with her in

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1 J. Epstein - Confidential  
 2 Jeffrey Epstein's room?"  
 3 Do you see that question?  
 4 A. Yes.  
 5 Q. And then you see an answer there, "I have  
 6 never participated at any time with Virginia in a  
 7 massage with Jeffrey."  
 8 Do you see that answer?  
 9 A. Yes.  
 10 Q. And I represent to you the answer is being  
 11 given by Ms. Maxwell during a sworn deposition. Will  
 12 you understand that with regard to my questions here?  
 13 A. Yes.  
 14 Q. Miss Maxwell's testimony is not truthful,  
 15 is it, sir?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. In fact, you, Maxwell, and Virginia all had  
 21 sexual contact together at the same time on multiple  
 22 occasions, true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. How many times have you, Maxwell, and  
 4 Virginia had sexual contact together?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. On multiple occasions you and Maxwell  
 10 jointly participated in sexual abuse of Virginia,  
 11 true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. Have you and Maxwell ever jointly  
 17 participated in the sexual abuse of Virginia?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. How many times have you and Maxwell jointly  
 23 participated in the sexual abuse of Virginia?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Your understanding of all the facts in this  
 5 case is that Maxwell was lying when she denied sexual  
 6 abuse of Virginia, true?  
 7 MR. PAGLIUCA: Objection to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. If Maxwell had told the truth in her  
 12 deposition, she would have admitted to sexually  
 13 abusing Virginia, true?  
 14 MR. PAGLIUCA: Objection to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. When you and Maxwell were jointly sexually  
 19 abusing Virginia, who were the witnesses to that  
 20 activity?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. It's true, sir, that when you and Maxwell

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1 J. Epstein - Confidential  
 2 were jointly sexually abusing Virginia, you two were  
 3 the only two witnesses who could see what was going  
 4 on?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Are there any other witnesses I should call  
 10 to try to depose and talk to to see whether you and  
 11 Maxwell were jointly sexually abusing Virginia?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. How many times did you and Maxwell have sex  
 17 with Virginia?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21  
 22 BY MR. CASSELL:  
 23 Q. How many times did you have sex with  
 24 Virginia?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. How many times, to your knowledge, did  
 6 Maxwell have sex with Virginia?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Sir, it's true that you had sex with  
 12 Virginia dozens if not hundreds of times; isn't that  
 13 true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. And to your knowledge, Maxwell had sex with  
 19 Virginia dozens and dozens of times, true?  
 20 MR. PAGLIUCA: Objection to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. What years did you and Maxwell have sex  
 25 with Virginia?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. It's true that you and Maxwell had sex with  
 7 Virginia in the year 2000, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. It's true that you and Maxwell had sex with  
 13 Virginia in the year 2001, true?  
 14 MR. PAGLIUCA: Object to forma and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. You had sex with Virginia repeatedly when  
 19 she was under the age of 18, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You also had sex with Virginia when she was  
 25 under the age of 17, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. You had sex with Virginia when she was  
 7 16 years old, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Maxwell had sex with Virginia when she was  
 13 16, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Maxwell had sex with Virginia when she was  
 19 17, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 MR. CASSELL: If I could just confer  
 24 with counsel for a moment.  
 25 (A discussion was held off the record.)

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. You have a sexual preference for having sex  
 4 with girls between the ages of 12 to 17, true?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Between 2000 and 2005, you sexually abused  
 10 more than 100 girls under the age of 18 in Florida,  
 11 true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. Between 2000 and 2005, you also sexually  
 17 abused dozens of girls in other locations as well,  
 18 true?  
 19 MR. PAGLIUCA: Objection to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. In about 2002, you and Maxwell asked  
 24 Virginia to carry a baby for the two of you, true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. When you asked Virginia to carry a baby for  
 6 you, part of your proposal was for her to turn the  
 7 baby over to the two of youth -- to the two of you at  
 8 the end of the pregnancy, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. In about June or July of 2001, you and  
 14 Maxwell took Virginia to a hospital in New York City  
 15 because of a problem she was having with vaginal  
 16 bleeding, true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. When you and Maxwell took Virginia to the  
 22 hospital, the two of you lied to the hospital to make  
 23 her age 18 rather than 17, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. You and Maxwell have had so-called  
 5 threesomes, i.e., sexual activity with three people  
 6 at the same time, with multiple girls who were under  
 7 the age of 18, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Many of these threesomes occurred in  
 13 Florida, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. You and Maxwell have also participated in  
 19 sex orgies with Virginia, true?  
 20 MR. PAGLIUCA: Objection to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You and Maxwell participated in sex orgies  
 25 with Virginia while she was under the age of 18,

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1 J. Epstein - Confidential  
 2 true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. You and Maxwell participated in sex orgies  
 8 with many other girls, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 THE COURT REPORTER: Excuse me. Can we  
 13 go off the record? I'm sorry.  
 14 VIDEO TECHNICIAN: Off the record at  
 15 9:39 a.m.  
 16 (A discussion was held off the record.)  
 17 VIDEO TECHNICIAN: On the record at  
 18 9:41.  
 19 BY MR. CASSELL:  
 20 Q. Sir, without regard to any conduct that you  
 21 may or may not have committed, what do you understand  
 22 the word "orgy" to mean?  
 23 A. Fifth.  
 24 Q. Sir, in the summer of 2000, you first met  
 25 Miss Virginia Giuffre in your Palm Beach mansion,

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1 J. Epstein - Confidential  
 2 true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Ms. Maxwell was the person who first  
 8 introduced you to Virginia, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. At the time, Virginia was just 16 years  
 14 old, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. When you first met Miss Giuffre -- and I  
 20 guess I'll refer to as Virginia for the rest of these  
 21 questions -- her physical appearance to you was that  
 22 she was only 16 years old, true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. The reason Maxwell introduced Virginia to  
 4 you was so that you could have sex with Virginia,  
 5 true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. In fact, on a number of occasions in 2000  
 11 and 2001, both you and Maxwell simultaneously had sex  
 12 with Virginia, true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Without going into detail, please describe  
 18 the nature of the sex acts that you performed on  
 19 Virginia in 2000 and 2001?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Without going into detail, please describe  
 25 the nature of the sex acts that you observed Maxwell

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1 J. Epstein - Confidential  
 2 perform on Virginia in 2000 and 2001.  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. In the fall of 2000, you and Maxwell  
 8 trained Virginia on how to cater to the sexual  
 9 desires of your male friends, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. And from 2000 through 2002, you forced  
 15 Virginia to interact sexually with many of your male  
 16 friends, true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. From 2000 through 2001, you forced Virginia  
 22 to sexually interact with Harvard Law Professor,  
 23 Alan Dershowitz?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.



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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. It would be a fair statement to describe  
 5 Virginia's situation from the fall of 2000 through  
 6 July 2001 as your sex slave, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. You understand the term "sex slave," don't  
 12 you, sir?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Without to regard to any conduct that you  
 18 may or may not have committed, what does the term  
 19 "sex slave" mean to you?  
 20 A. Fifth.  
 21 (Plaintiff's Exhibit JE2, Document with  
 22 titles of books was marked for identification.)  
 23 BY MR. CASSELL:  
 24 Q. I'm going to show you what I'll mark as  
 25 JE2.

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1 J. Epstein - Confidential  
 2 A. Are you finished with this?  
 3 Q. Yeah. We're through with that now.  
 4 You recognize the books listed on this  
 5 document, don't you, sir?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. The first book listed here as being sold by  
 11 Amazon is "Slave Craft: Road Maps For Erotic  
 12 Servitude, Principles, Skills, and Tools."  
 13 Do you see that, sir?  
 14 A. Yes.  
 15 Q. That was a book you ordered, sir, true?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. The second book listed here is "Training  
 21 With Ms. Abernathy. A Workbook For Erotic Slaves and  
 22 Their Owners."  
 23 Do you see that there, sir?  
 24 A. Yes.  
 25 Q. That was another book that you ordered,

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1 J. Epstein - Confidential  
 2 true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. You relied on the Defendant in this case,  
 8 Ghislaine Maxwell, to keep Virginia available for to  
 9 you sexually abuse, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Are we finished with  
 13 this?  
 14 BY MR. CASSELL:  
 15 Q. Yes.  
 16 MR. CASSELL: Did we get an answer to  
 17 -- to that?  
 18 MR. PAGLIUCA: Yes, you did. We did  
 19 not?  
 20 MR. GOLDBERGER: Yes. I thought he  
 21 said the Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Let me just re-ask the question, because  
 24 it's an important one.  
 25 Sir, you relayed on the Defendant in this

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1 J. Epstein - Confidential  
 2 case, Ms. Maxwell, to keep Virginia available --  
 3 available for you to sexually abuse, true?  
 4 MR. PAGLIUCA: Objection to the form  
 5 and foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. What did Miss Maxwell do for you in the  
 9 years 2001 and 2001?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Please briefly describe the nature of the  
 15 interactions you observed between the Defendant in  
 16 this case, Ms. Maxwell, and the Plaintiff in this  
 17 case, Ms. Virginia Roberts, from -- Miss Virginia  
 18 Roberts Giuffre, from the fall of 2000 through the  
 19 summer of 2001.  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. The reason you're taking the Fifth, with  
 25 regard to Maxwell's interactions, is that she was

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1 J. Epstein - Confidential  
 2 involved in the sexual abuse of Virginia, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Please describe the massage room upstairs  
 8 in your Palm Beach mansion.  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. It's true, sir, that you do have a massage  
 14 room upstairs in your Palm Beach mansion, right?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. What kinds of rooms do you have upstairs in  
 20 your Palm Beach mansion?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. In that massage room, Maxwell kept a basket

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1 J. Epstein - Confidential  
 2 of sex toys, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. And if we narrow the time frame down to the  
 8 years 2000 and 2001, Maxwell had a basket of sex toys  
 9 there, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Maxwell used sex toys on Virginia in your  
 15 presence, true?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. What is your understanding of the term "sex  
 21 toy" without regard to any conduct that you may or  
 22 may not have committed in the past?  
 23 A. Fifth.  
 24 Q. Before August 2001, Maxwell forcibly  
 25 penetrated Virginia with an artificial penis or dildo

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1 J. Epstein - Confidential  
 2 in your presence, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. You and Maxwell flew together with Virginia  
 8 over 20 times when Virginia was under the age of 18,  
 9 true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. How many times did you and Maxwell fly  
 15 together with Virginia before August of 2001?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You and Maxwell trafficked Virginia while  
 21 she was under the age of 17 to other men for sexual  
 22 purposes, true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. During the period of time 2000 to 2001, you  
 4 were having sex as many as three times a day, true?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. And during that time period, Maxwell was  
 10 bringing girls to you to take the pressure off her to  
 11 have that much sex, true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. You and Maxwell asked girls under the age  
 17 of 18 to bring other girls under the age of 18 to you  
 18 for sexual purposes, true?  
 19 MR. PAGLIUCA: Objection to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 Can I have some water?  
 23 MR. CASSELL: Uh-huh.  
 24 BY MR. CASSELL:  
 25 Q. Maxwell was in charge of coordinating the

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1 J. Epstein - Confidential  
 2 girls who came to your house for sexual purposes,  
 3 true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Maxwell and your house staff used message  
 9 pads to coordinate the schedule for the girls coming  
 10 over to your houses, true?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Maxwell often paid the girls who came over  
 16 to your house for sexual purposes, true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Who paid the girls who came over to your  
 22 house for sexual purposes?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Maxwell used the prospect that girls could  
 4 become models for Victoria's Secret to lure them over  
 5 to your house, true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. How did you lure girls over to your house  
 11 for sexual purposes?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. What techniques did you see Maxwell using  
 17 to lure girls over to your house for sexual purposes?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. On or about March 9th, 2001, you, the  
 23 Defendant in this case, Ms. Maxwell, Emmie Taylor,  
 24 and Virginia flew on your private jet from Tangiers  
 25 to Luton International Airport in the London, England

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1 J. Epstein - Confidential  
 2 metropolitan area?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. On that trip you stayed in London at  
 8 Maxwell's flat, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. At that time, it would be a fair assessment  
 14 to say that Maxwell was your girlfriend, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. In March of 2001, who was your girlfriend?  
 20 A. Fifth.  
 21 Q. During that trip, in March of 2001,  
 22 Maxwell, Virginia, and Prince Andrew, that is, the  
 23 Duke of York, all met at night inside Maxwell's flat,  
 24 true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Did you meet Prince Andrew, the Duke of  
 6 York, in about March of 2001 in London?  
 7 A. Fifth.  
 8 MR. CASSELL: I guess we'll mark this  
 9 as JE3.  
 10 (Plaintiff's Exhibit JE3, Photograph  
 11 depicting Prince Andrew, Maxwell, and Virginia was  
 12 marked for identification.)  
 13 MR. CASSELL: I've got copies for  
 14 opposing counsel here.  
 15 MR. GOLDBERGER: Thank you.  
 16 BY MR. CASSELL:  
 17 Q. Showing you what's been marked as JE3. Do  
 18 you have that in front of you, sir?  
 19 A. Yes.  
 20 Q. Do you recognize that photograph?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Sir, this is a photograph depicting

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1 J. Epstein - Confidential  
 2 Prince Andrew, Maxwell, and Virginia all together,  
 3 true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. You took this photograph, right, sir?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Who took this photograph?  
 14 A. Fifth.  
 15 Q. If you look at the person on the left, the  
 16 male figure in the photograph, do you see that person  
 17 there?  
 18 A. Yes.  
 19 Q. That person has his arm around the bare  
 20 midriff of a young girl, true?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Yes.  
 24 BY MR. PAGLIUCA:  
 25 Q. That's Prince Andrew's arm around the waist

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1 J. Epstein - Confidential  
 2 of Virginia touching her bare midriff, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. The only persons inside of Maxwell's flat  
 8 at this time, in addition to you and Maxwell, were  
 9 Virginia and Prince Andrew, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Where was this photograph taken?  
 15 MR. PAGLIUCA: Object to foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. This photograph was taken in Maxwell's flat  
 19 in London, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You immediately recognized where this  
 25 picture was taken, didn't you, sir?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. And based on your understanding of the  
 7 circumstances surround the taking -- surrounding the  
 8 taking of this photograph, Ms. Maxwell would have  
 9 immediately identified who was in this photograph and  
 10 where it was taken, true?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Could you repeat that  
 14 question? I'm sorry. Could you repeat that  
 15 question?  
 16 BY MR. CASSELL:  
 17 Q. And based on your understanding of the  
 18 circumstances surrounding the taking of this  
 19 photograph, Ms. Maxwell would have immediately  
 20 identified who was in this photograph, true?  
 21 MR. PAGLIUCA: Same objection.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. And based on your understanding of the  
 25 circumstances surrounding the taking of this

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1 J. Epstein - Confidential  
 2 photograph, Ms. Maxwell would have immediately  
 3 identified where this photograph was taken, true?  
 4 MR. PAGLIUCA: Same objection.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. The only persons -- I think we may have  
 8 already asked this. Let's see. Let me just ask this  
 9 to make sure.  
 10 The only persons inside of Maxwell's flat  
 11 at that time, in addition to you and Maxwell, were  
 12 Virginia and Prince Andrew, true?  
 13 MR. PAGLIUCA: Form -- form and  
 14 foundation. Asked and answered.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Prince Andrew's security detail remained  
 18 outside of Maxwell's flat when this photograph was  
 19 taken, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Shortly after this photograph was taken,  
 25 you and Maxwell both observed Prince Andrew and

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 2 Virginia go into the room depicted in the back of the  
 3 photograph, true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. And in this photograph, you do see a room  
 9 depicted in the back?  
 10 A. Fifth.  
 11 Q. You're taking the Fifth about what is shown  
 12 in this photograph?  
 13 A. I -- I can't see anything. I'm sorry.  
 14 MR. GOLDBERGER: Okay. So it's -- so  
 15 we're not -- we're not raising Fifth  
 16 Amendment privilege.  
 17 You cannot -- your answer is, you  
 18 cannot see what Mr. Cassell is referring to?  
 19 THE WITNESS: Correct.  
 20 MR. GOLDBERGER: Okay.  
 21 BY MR. CASSELL:  
 22 Q. Do you see a window depicted in this  
 23 photograph?  
 24 A. I don't know what it is. I'm sorry.  
 25 Q. Do you see a white light reflecting off of

1 J. Epstein - Confidential  
 2 all the circumstances surrounding this situation to  
 3 say that you forced Virginia to have sex with  
 4 Prince Andrew?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. What would have happened to Virginia if she  
 10 had refused to have sex with Prince Andrew?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. At the time Virginia retired to the bedroom  
 16 with Prince Andrew, Maxwell was in possession and  
 17 control of Virginia's U.S. pass -- passport, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Who had Virginia's passport when she  
 23 entered England?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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 2 a blue surface in this photograph?  
 3 A. Yes.  
 4 Q. Does that appear to you to be a window?  
 5 A. Not necessarily, no.  
 6 MR. GOLDBERGER: Why don't you just  
 7 assume arguendo that -- that that -- what --  
 8 what you're trying to have Mr. Epstein  
 9 identify is a room, and then we can go on  
 10 from there.  
 11 MR. CASSELL: All right.  
 12 BY MR. CASSELL:  
 13 Q. That room is a bedroom in Ms. Maxwell's  
 14 flat, true?  
 15 MR. PAGLIUCA: Object to the form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. You and Maxwell instructed Virginia to have  
 20 sex with Prince Andrew, true?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. In fact, it would be a fair assessment of

1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. After she was inside of English territory,  
 5 who main con- -- remained in control of her passport?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Virginia was 17 years old at this time,  
 11 true?  
 12 A. Fifth.  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Sorry. Fifth.  
 16 BY MR. CASSELL:  
 17 Q. It was your understanding that  
 18 Prince Andrew and Virginia was retiring to this  
 19 bedroom to have sex, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. What did you understand Virginia and  
 25 Prince Andrew to be doing that evening?

1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Shortly after Prince Andrew and Virginia  
 6 had sex, Virginia gave you a full report about the  
 7 details of the sex, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Did Virginia tell you anything after this  
 13 photograph was taken about Prince Andrew?  
 14 MR. PAGLIUCA: Object to foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Did Prince Andrew tell you anything about  
 18 what he had done with Virginia in the room?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Isn't it true, sir, that Prince Andrew  
 24 thanked you for making Virginia available to him for  
 25 sexual purposes?

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 2 BY MR. CASSELL:  
 3 Q. What, if anything, did you do with the  
 4 information that Virginia gave you after you had  
 5 sex -- after she had sex with men?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Approximately the next day after this  
 11 photograph was taken, you made Virginia report to you  
 12 in detail about Prince Andrew's sexual preferences,  
 13 true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. What, if anything, do you know about  
 19 Prince Andrew's sexual preferences?  
 20 MR. PAGLIUCA: Object to foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. We can go into the details if this would  
 24 help refresh your memory, but isn't it true that  
 25 Virginia recounted specific behavior that

1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. You had previously instructed Virginia that  
 7 she had to give you a full report on the details of  
 8 what men like Prince Andrew did to her so that you  
 9 would have blackmail material you could use, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. What instructions, if any, had you given to  
 15 Virginia about what she should say after she had sex  
 16 with men?  
 17 MR. PAGLIUCA: Object to foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. What did you do with the information that  
 21 Virginia gave you after she had sex with men?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

1 J. Epstein - Confidential  
 2 Prince Andrew requested before sexual intercourse?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. The reason you asked for a detailed review  
 8 of Prince Andrew's sexual activities was so that you  
 9 would have blackmail information about him, true?  
 10 MR. PAGLIUCA: Object to form. Asked  
 11 and answered.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Why did you ask for a detailed review of  
 15 Prince Andrew's sexual activities?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You had previously told Virginia it was  
 21 part of her job to give you detailed information  
 22 about the men that you and Maxwell forced her to have  
 23 sex with, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. When Virginia had sex with men that you  
 5 forced upon her, what was her job?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. What would have happened to Virginia if she  
 11 had refused your request to have sex with men?  
 12 MR. PAGLIUCA: Objection to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. Isn't it true, sir, that you would have  
 17 threatened Virginia and, in fact, potentially harmed  
 18 her if she refused to have sex with the men you  
 19 provided to her?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. What kind of threats did you make against  
 25 Virginia when she was with you?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Please describe all the threats you have  
 7 ever made against Virginia.  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Have you every made threats against  
 13 Virginia?  
 14 A. Fifth.  
 15 Q. At one point you told Virginia that you  
 16 needed detailed sexual information from the men she  
 17 had sex with so those men would owe you favors, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation?  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. When you provided Virginia to men to have  
 23 sex, they then did owe you favors, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. In 2000, Virginia was approached by  
 5 Maxwell, true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Maxwell was one of the main women whom you  
 11 used to procure underage girls for sexual activities,  
 12 true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. It was your understanding that Maxwell met  
 18 Virginia at the Mar-a-Lago Club in Palm Beach in  
 19 2000, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. In 2000, you were a member of the  
 25 Mar-a-Lago Club, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. In 2000, Ms. Maxwell had access to the  
 6 Mar-a-Lago Club, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. The reason Maxwell had access to the  
 12 Mar-a-Lago Club in 2000 was because of your  
 13 connections to the club, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Maxwell was a primary co-conspirator in  
 19 your sexual abuse scheme, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Maxwell was a primary co-conspirator in  
 25 your sex trafficking scheme, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Maxwell herself regularly participated in  
 7 your sexual exploitation of minors, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 found.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. In 2000, Maxwell herself regularly  
 13 participated in your sexual exploitation of minors,  
 14 true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Maxwell herself regularly participated in  
 20 your sexual exploitation of Virginia, true?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Did Maxwell participate in your sexual

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1 J. Epstein - Confidential  
 2 exploitation of Virginia?  
 3 MR. PAGLIUCA: Object to foundation.  
 4 THE WITNESS: Fifth.  
 5 Can we take a break so I can stand up?  
 6 MR. CASSELL: Sure.  
 7 VIDEO TECHNICIAN: Off the record at  
 8 10:01.  
 9 (A recess was taken.)  
 10 VIDEO TECHNICIAN: This is the  
 11 beginning of disc two. On the record at  
 12 10:08.  
 13 BY MR. CASSELL:  
 14 Q. Has Maxwell ever made any threats against  
 15 Virginia?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. It's true, sir, that Maxwell has threatened  
 21 Virginia, right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Has Maxwell ever made any threats against  
 4 other girls that you interacted with?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. It's true, sir, that Maxwell has made  
 10 threats against other girls with whom you've  
 11 interacted?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. Has Maxwell ever told girls that they  
 17 should keep quiet about the sexual activities you  
 18 have had with them?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. It's true, sir, Maxwell has made threats  
 24 against girls to tell them or force -- sorry. Let me  
 25 to start over.

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1 J. Epstein - Confidential  
 2 It's true, sir, that Maxwell has told girls  
 3 they should keep quiet about the sexual activities  
 4 you had with them, right?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Has Maxwell ever told girls they should  
 10 keep quiet about the sexual activities she had with  
 11 them?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. It's true, sir, that Maxwell had told girls  
 17 they should keep quiet about the sexual activity she  
 18 had with them, right?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. What, if anything, did Maxwell tell  
 24 Virginia would happen to her if she refused your  
 25 demands to have sex?



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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Isn't it true, sir, that Maxwell threatened  
 7 Virginia if she refused to have sex with you?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Maxwell regularly participated in your  
 13 sexual exploitation of Virginia, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Maxwell persuaded Virginia to come to your  
 19 mansion in 2000, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Virginia was 16 years old when Maxwell  
 25 persuaded her to come to your mansion, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. The fashion in which Maxwell persuaded  
 7 Virginia to come to your mansion was similar to the  
 8 manner in which you coerced dozens of other children  
 9 to come to your mansion, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. When Virginia be- -- sorry.  
 15 When Virginia began giving you a massage,  
 16 you and Maxwell turned it into a sexual encounter,  
 17 true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. You had done the same thing with many other  
 23 victims, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. After you first sexually abused Virginia,  
 5 you became enamored with her, true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. How did you feel about Virginia after you  
 11 first met her?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. With the assistance of Maxwell, you  
 17 converted Virginia into what is commonly referred to  
 18 as a sex slave, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. When you interacted with Virginia in 2000  
 24 and 2001, what were you doing with her?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. You sexually exploited Virginia from the  
 6 summer of 2000 through about September 2002, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. In 2002, Virginia managed to escape to a  
 12 foreign country and hide from you, true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. In 2002, when Virginia escaped, she was  
 18 also hiding from Maxwell, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Why would Virginia have wanted to hide from  
 24 you in 2002?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Virginia was hiding from you because she  
 6 was afraid of you, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Virginia was hiding from Maxwell because  
 12 she was afraid of Maxwell, true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. From 2000 through 2002, you and Maxwell  
 18 sexually abused Virginia in Palm Beach, Florida,  
 19 true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. From 2000 through 2002, you and Maxwell  
 25 sexually abused Virginia in New York City, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. From 2000 through 2002, you and Maxwell --  
 7 Maxwell sexually abused Virginia in New Mexico, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. From 2000 through 2002, you and Maxwell  
 13 sexually abused Virginia in the U.S. Virgin Islands?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. From 2000 through 2002, you and Maxwell  
 19 sexually abused Virginia on your private jet?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You abused Virginia other places than the  
 25 ones I've just mentioned, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Maxwell sexually abused Virginia in places  
 7 other than the ones I just mentioned, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Please list all the places that you had sex  
 13 with Virginia.  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Please list all the places where, to your  
 19 knowledge, Maxwell had sex with Virginia.  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You and Maxwell sexually trafficked  
 25 Virginia by forcing her to have sex with politically

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1 J. Epstein - Confidential  
 2 connected and financially powerful people, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Your purpose in sending Virginia to such  
 8 powerful people was to ingratiate yourself with them,  
 9 true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Maxwell's purpose in sending Virginia to  
 15 such powerful people was to ingratiate herself with  
 16 them, true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. The reason you and Maxwell were sending  
 22 Virginia to these powerful people was for business,  
 23 personal, political, and financial gain, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Another reason was to gain potential  
 5 blackmail information, true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Maxwell was fully involved in sending  
 11 Virginia to various powerful people for sexual  
 12 purposes, true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. And Maxwell was hoping to obtain blackmail  
 18 information as well, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. You observed Maxwell sexually abuse  
 24 Virginia in 2000, true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. You observed Maxwell sexually abuse  
 6 Virginia in 2001?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. How many times have you observed Maxwell  
 12 sexually abuse Virginia?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. How many times have you observed Maxwell  
 18 have any form of sexual interaction with Virginia?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. One powerful individual that you and  
 24 Maxwell forced Virginia to have sexual relations with  
 25

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1 J. Epstein - Confidential  
 2 was former -- former Harvard Law Professor,  
 3 Alan Dershowitz, true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. You and Maxwell required Virginia to have  
 9 sexual relations with Dershowitz on numerous  
 10 occasions while she was a minor, true?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. You and Maxwell forced Virginia to have  
 16 sexual relations with Dershowitz in Florida,  
 17 New York, New Mexico, and the U.S. Virgin Islands,  
 18 among other places, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Please list all the places where you forced  
 24 Virginia to have sexual relations with Dershowitz.  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. In addition to being a participant in the  
 6 abuse of Virginia and other minors, Dershowitz was an  
 7 eyewitness to the sexual abuse of many other minor  
 8 girls by you and Maxwell, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Dershowitz was an eyewitness to the sexual  
 14 abuse of many other minors by you, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. One way to describe Maxwell's role for you  
 20 was as a madam, true?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. You've heard the term "madam" used in

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1 J. Epstein - Confidential  
 2 reference to someone who is a procurer of women or  
 3 other girls for sex, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. What was Maxwell's role for you in 2000 and  
 9 2001?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. What was Maxwell's role with you in 2005?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Using the term "madam" as I had previously  
 20 defined it, wouldn't it be fair to say Maxwell was a  
 21 madam for you in 2000?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Wouldn't it fair to say that she was an  
 4 madam for you in 2001?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Wouldn't it be fair to say that she was a  
 10 madam for you in 2006?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. It would be fair to say that Maxwell  
 16 assumed -- assumed a position of trust for the girls  
 17 whom you sexually abused, including Virginia, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. You know that Maxwell had sex with dozens  
 23 of underage girls, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Maxwell had sex with Virginia in the U.S.  
 5 Virgin Islands, New Mexico, New York, France, and  
 6 many other locations, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. From 2000 through 2005, what kinds of  
 12 pictures did you have in your Florida mansion?  
 13 A. Fifth.  
 14 Q. From 2000 through 2005, what kind of  
 15 pictures did you have in your New York City mansion?  
 16 A. Fifth.  
 17 Q. From 2000 to 2005, what kinds of pictures  
 18 did you have in the U.S. Virgin Islands' residence?  
 19 A. Fifth.  
 20 Q. Maxwell took sexually explicit pictures of  
 21 many underage girls, true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. What kinds of pictures have you seen  
 4 Maxwell take?  
 5 MR. PAGLIUCA: Object to foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Have you ever seen Maxwell take pictures of  
 9 girls under the age of 18?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. It's true, sir, that you've seen Maxwell  
 15 take many picture of girls under the age of 18, true?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. In fact, you displayed pictures of naked  
 21 girls throughout your home in Florida, true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. In fact, you displayed pictures of naked  
 4 girls throughout your home in New York, true?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. In fact, you displayed pictures of naked  
 10 girls throughout your home in the U.S. Virgin  
 11 Islands, true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. In fact, you displayed pictures of naked  
 17 girls throughout your home in New Mexico, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Tell me about all the circumstances in  
 23 which you've seen Maxwell providing cameras to  
 24 people.  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. You had Maxwell provide cameras to underage  
 6 girls, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Your purpose in having Maxwell provide  
 12 cameras to underage girls was to have them take  
 13 sexually explicit pictures of themselves, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Have you ever seen Maxwell take a sexually  
 19 explicit picture of an underage girl?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You and Maxwell viewed together sexually  
 25 explicit pictures of girls under the age of 18, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Please describe all the pictures of girls  
 7 that you've seen Maxwell take.  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Now, you have interacted with Maxwell in  
 13 England many times, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. I want you to understand that the next  
 19 series of questions we'll be dealing just with your  
 20 actions in England, not with any of your actions in  
 21 the United States.  
 22 Will you understand that with regard to my  
 23 next questions?  
 24 A. Yes.  
 25 Q. While you were in England, you directed

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1 J. Epstein - Confidential  
 2 Maxwell to bring English females under the age of 18  
 3 to you for sexual purposes, true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. While in England, in Miss Maxwell's private  
 9 residence, you observed Maxwell in the presence of  
 10 English females under the age of 18, true?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. While in England, Ms. Maxwell brought you  
 16 English females to satisfy your sexual purposes,  
 17 true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. How young were the English girls that  
 23 Maxwell brought to you?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Please describe how many times you have  
 5 seen Maxwell in private locations with girls under  
 6 the age of 18 in England.  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. You recognize the name Alexandra Dickson,  
 12 don't you, sir?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Alexandra Dickson was an English girl  
 18 recruited by Maxwell for your sexual purposes, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Tell me how you came to meet Alexandra  
 24 Dickson in England.  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. When you met Alexandra Dickson, she was  
 3 under the age of 18, true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. How old was Alexandra Dickson when you  
 9 first met her?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Based on your understanding of English  
 15 criminal law, you have observed Maxwell commit  
 16 English criminal offenses of a sexual nature in  
 17 England, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Have you ever observed Maxwell commit a  
 23 crime in England?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Please describe for me all the crimes you  
 5 have seen Maxwell commit in England.  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. While in England, you instructed Maxwell to  
 11 go to public places to solicit English girls to have  
 12 sex with you in England in exchange for compensation,  
 13 true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. What instructions did you give to Maxwell  
 19 in England about what she should do for you?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Please describe Maxwell's interactions in  
 25 England with females under the age of 18.

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Please describe Maxwell's interactions in  
 7 England with e-mails under the age of 18 with whom  
 8 you had sex.  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. You have yourself solicited in public  
 14 places English girls under the age of 18 to have sex  
 15 with you in exchange for compensation, true?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. And just so I'm clear, you have, in  
 21 England, yourself, solicited in public places English  
 22 girls under the age of 18 to have sex with you in  
 23 exchange for compensation, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Please describe your interaction with  
 5 females under the age of 18 in England.  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Please describe your interactions with  
 11 females under the age of 18 with whom you have had  
 12 sex in England.  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. You have had sex with females under the age  
 18 of 18 in England in exchange for compensation, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Based on your understanding of English  
 24 criminal law, you have committed domestic English sex  
 25 offenses in England, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Without going into any acts you have com-  
 7 -- may have committed, what is your understanding of  
 8 English criminal law regarding soliciting sex?  
 9 MR. PAGLIUCA: Object to foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. During the time period 2000 to 2002,  
 13 Maxwell and you lived together for significant parts  
 14 of those years, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. During the time period 2000 to 2002,  
 20 Maxwell was responsible for much of the day-to-day  
 21 operation of your Florida mansion, true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Who is the person you interacted with most  
 4 in the year 2000?  
 5 A. Fifth.  
 6 Q. Who was the person you interacted most in  
 7 the year -- let me rephrase.  
 8 Who is the person that you interacted with  
 9 the most in 2001?  
 10 A. Fifth.  
 11 Q. Who is the person that you interacted the  
 12 most with in 2002?  
 13 A. Fifth.  
 14 Q. Isn't it true, sir, that the person you  
 15 interacted with most in the year 2000 was Maxwell?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Isn't it true the person you interacted  
 21 with most in the year 2001 was Maxwell?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Who did you interact the most with in the  
 4 year 2005?  
 5 A. Fifth.  
 6 Q. Isn't it true, sir, that you interacted the  
 7 most with Maxwell in the year 2005?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Who was responsible for the day-to-day  
 13 operation of your Florida mansion in 2000 to 2002?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation. Asked and answered.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Isn't it true Maxwell was responsible for  
 19 much of the day-to-day operation of your Florida  
 20 mansion in 2000 to 2002?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation. Asked and answered.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. During the time period 2000 to 2002, you

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1 J. Epstein - Confidential  
 2 were sexually -- sexually intimate with Maxwell,  
 3 true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. You have remained on friendly terms with  
 9 Maxwell even through today, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. How would you describe your relationship  
 15 today with Maxwell?  
 16 A. Fifth.  
 17 Q. In the period 2000 to 2002, you directed  
 18 Maxwell to recruit girls under the age of 18 for you  
 19 to use for sexual purposes, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. How did you get the girls that you sexually  
 25 abused in 2001 to 2002?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. The directions you gave Maxwell for  
 7 recruiting girls for you was something to the effect  
 8 of the younger the better, true?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Have you ever used the phrase "The younger  
 14 the better" in the presence of Maxwell?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. It's true, sir, that you've used the phrase  
 20 "The younger the better" in the presence of Maxwell,  
 21 right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. You instructed Maxwell, then -- when she  
 4 was recruiting girls for you, she could bring you  
 5 girls of any race except for African Americans, true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Have you ever discussed the age of underage  
 11 -- I'm sorry.  
 12 Have you ever discussed the race of  
 13 underage girls with Maxwell?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Why is it that you instructed Maxwell not  
 19 to bring you African American girls?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. I'm now going to ask you a question --  
 25 series of questions about overseas locations, and I

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1 J. Epstein - Confidential  
 2 want you to understand that each of these questions  
 3 is asking solely about your activities in these  
 4 overseas locations, and it's not in any way asking  
 5 for any information about actions that you may or may  
 6 not have committed in the United States.  
 7 Will you understand that with regard to  
 8 these next questions?  
 9 A. Yes.  
 10 Q. You have an apartment in Paris, France,  
 11 true?  
 12 A. Fifth.  
 13 Q. Maxwell has frequently been to your  
 14 apartment in Paris, France, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Please list all the places in the world  
 20 where you have an apartment.  
 21 A. Fifth.  
 22 Q. While Maxwell has been at your apartment in  
 23 Paris, France, you have had numerous girls under the  
 24 age of 18 in your presence, true?  
 25 MR. PAGLIUCA: Object to form and



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1 J. Epstein - Confidential  
2 foundation.  
3 THE WITNESS: Fifth.  
4 BY MR. CASSELL:  
5 Q. While she was with you in Paris, Maxwell  
6 recruited French girls under the age of 18 for to you  
7 sex with, true?  
8 MR. PAGLIUCA: Object to form and  
9 foundation.  
10 THE WITNESS: Fifth.  
11 BY MR. CASSELL:  
12 Q. Please describe all of your interactions  
13 with underage girls -- I'm sorry.  
14 Please describe all of your interactions  
15 with girls under the age of 18 in France.  
16 A. Fifth.  
17 Q. My next series of questions, again, are  
18 only asking for your activities in the foreign  
19 country in question, and that will be Thailand.  
20 Will you understand that with regard to my  
21 next questions?  
22 A. Yes.  
23 Q. You have been to Thailand, true?  
24 A. Fifth.  
25 Q. Have you ever been to Thailand?

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1 J. Epstein - Confidential  
2 A. Fifth.  
3 Q. When you went to Thailand, Maxwell  
4 accompanied you, true?  
5 MR. PAGLIUCA: Object to form and  
6 foundation.  
7 THE WITNESS: Fifth.  
8 BY MR. CASSELL:  
9 Q. When you went to Thailand, who went with  
10 you?  
11 A. Fifth.  
12 Q. You saw Maxwell in the presence of Thai  
13 females under the age of 18 in Thailand, true?  
14 MR. PAGLIUCA: Object to form and  
15 foundation.  
16 THE WITNESS: Fifth.  
17 BY MR. CASSELL:  
18 Q. Describe what you did with Maxwell in  
19 Thailand.  
20 MR. PAGLIUCA: Object to foundation.  
21 THE WITNESS: Fifth.  
22 BY MR. CASSELL:  
23 Q. While in Thailand, you directed Maxwell to  
24 recruit Thai females under the age of 18 for your  
25 sexual purposes solely in Thailand, true?

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1 J. Epstein - Confidential  
2 MR. PAGLIUCA: Object to form and  
3 foundation.  
4 THE WITNESS: Fifth.  
5 BY MR. CASSELL:  
6 Q. While in Thailand, Maxwell brought you  
7 females under the age of 18, true?  
8 MR. PAGLIUCA: Object to form and  
9 foundation.  
10 THE WITNESS: Fifth.  
11 BY MR. CASSELL:  
12 Q. Without going into any acts that you may or  
13 may not have committed, what is your understanding of  
14 Thai criminal law regarding sex with girls under the  
15 age of 18?  
16 MR. PAGLIUCA: Object to form and  
17 foundation.  
18 THE WITNESS: Fifth.  
19 BY MR. CASSELL:  
20 Q. Have you ever had sex with a Thai female  
21 under the age of 18 in Thailand?  
22 MR. PAGLIUCA: Object to form and  
23 foundation.  
24 THE WITNESS: Fifth.  
25

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1 J. Epstein - Confidential  
2 BY MR. CASSELL:  
3 Q. Have you ever had sex with anyone in  
4 Thailand?  
5 MR. PAGLIUCA: Object to form and  
6 foundation.  
7 THE WITNESS: Fifth.  
8 BY MR. CASSELL:  
9 Q. Please describe all the sexual activities  
10 you had in Thailand.  
11 A. Fifth.  
12 Q. My next series of questions are with regard  
13 to the country of Brunei, and I want you to  
14 understand that these questions deal solely with your  
15 activities in Brunei. All right?  
16 A. Yes.  
17 Q. In 2002, you flew to Brunei with Maxwell on  
18 your private jet, true?  
19 MR. PAGLIUCA: Object to form and  
20 foundation.  
21 THE WITNESS: Fifth.  
22 BY MR. CASSELL:  
23 Q. Have you ever been to Brunei?  
24 A. Fifth.  
25 Q. Have you ever been to Brunei with Maxwell?

1 J. Epstein - Confidential  
2 MR. PAGLIUCA: Object to form and  
3 foundation.  
4 THE WITNESS: Fifth.  
5 BY MR. CASSELL:  
6 Q. You have had sex with girls from Brunei  
7 under the age of 18 in Brunei?  
8 MR. PAGLIUCA: Object to form and  
9 foundation.  
10 THE WITNESS: Fifth.  
11 BY MR. CASSELL:  
12 Q. Please describe all the sex that you've  
13 that in Brunei.  
14 MR. PAGLIUCA: Object to form and  
15 foundation.  
16 THE WITNESS: Fifth.  
17 BY MR. CASSELL:  
18 Q. Maxwell helped you find girls from Brunei  
19 for you to have sex with in Brunei, true?  
20 MR. PAGLIUCA: Object to form and  
21 foundation.  
22 THE WITNESS: Fifth.  
23 BY MR. CASSELL:  
24 Q. What did Maxwell do in Brunei with you?  
25 MR. PAGLIUCA: Object to form and

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2 MR. PAGLIUCA: Object to form and  
3 foundation.  
4 THE WITNESS: Fifth.  
5 BY MR. CASSELL:  
6 Q. Please tell me about your sexual abuse in  
7 the Czech Republic of Czech's -- Czech girls under  
8 the age of 18.  
9 MR. PAGLIUCA: Object to form and  
10 foundation.  
11 THE WITNESS: Fifth.  
12 BY MR. CASSELL:  
13 Q. Have you ever had sex in the Czech  
14 Republic?  
15 MR. PAGLIUCA: Object to form and  
16 foundation.  
17 THE WITNESS: Fifth.  
18 BY MR. CASSELL:  
19 Q. Please tell me who you've had sex with in  
20 the Czech Republic.  
21 MR. PAGLIUCA: Object to form and  
22 foundation.  
23 THE WITNESS: Fifth.  
24 BY MR. CASSELL:  
25 Q. Please tell me about Maxwell's involvement

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2 foundation.  
3 THE WITNESS: Fifth.  
4 BY MR. CASSELL:  
5 Q. Are you aware of inter- -- interaction by  
6 Maxwell with women in Brunei?  
7 MR. PAGLIUCA: Object to form and  
8 foundation.  
9 THE WITNESS: Fifth.  
10 BY MR. CASSELL:  
11 Q. Are you aware of any interaction by Maxwell  
12 with girls under the age of 18 in Brunei?  
13 MR. PAGLIUCA: Object to form and  
14 foundation.  
15 THE WITNESS: Fifth.  
16 BY MR. CASSELL:  
17 Q. Please describe all the interactions you  
18 saw between Maxwell and girls from Brunei in Brunei.  
19 A. Fifth.  
20 Q. My next questions deal solely with your  
21 activities in the Czech Republic.  
22 Have you ever been to the Czech Republic?  
23 A. Fifth.  
24 Q. Have you ever been to the Czech Republic  
25 with Maxwell?

1 J. Epstein - Confidential  
2 in your sexual abuse of Czech girls in the Czech  
3 Republic.  
4 MR. PAGLIUCA: Object to form and  
5 foundation.  
6 THE WITNESS: Fifth.  
7 BY MR. CASSELL:  
8 Q. Maxwell has been to the Czech Republic with  
9 you?  
10 MR. PAGLIUCA: Object to form and  
11 foundation.  
12 THE WITNESS: Fifth.  
13 BY MR. CASSELL:  
14 Q. When you went to the Czech Republic, who  
15 did you meet?  
16 MR. PAGLIUCA: Object to form and  
17 foundation.  
18 THE WITNESS: Fifth.  
19 BY MR. CASSELL:  
20 Q. Was Maxwell ever with you when you were in  
21 the presence of girls under the age of 18 in the  
22 Czech Republic?  
23 MR. PAGLIUCA: Object to form and  
24 foundation.  
25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. It's true, sir, that Maxwell was with you  
 4 when you were in the presence of girls under the age  
 5 of 18 in the Czech Republic, right?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Please name all of the countries, not  
 11 including the United States, where you have seen  
 12 Maxwell in the presence of females who lived in those  
 13 countries under the age of 18.  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Please describe for me Maxwell's sexual  
 19 interactions with females under the age of 18 in  
 20 foreign countries with citizens of those countries.  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Has Maxwell ever interacted with females

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1 J. Epstein - Confidential  
 2 under the age of 18 in foreign countries?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Has Maxwell ever interacted with minor  
 8 girls from the former country known as  
 9 Czechoslovakia?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Based on your understanding of the criminal  
 15 laws of other foreign countries, have you ever  
 16 committed a crime of a sexual nature in another  
 17 foreign country?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Please describe all the crimes of a sexual  
 23 nature that you have committed in foreign countries.  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Based on your understanding of the criminal  
 5 laws of other countries, has Maxwell ever committed a  
 6 crime of a sexual nature in another country?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Please describe all the crimes of a sexual  
 12 nature that you understand Maxwell has committed  
 13 foreign countries.  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. You are a multimillionaire, true, sir?  
 19 A. Fifth.  
 20 Q. How much are you worth today?  
 21 A. Fifth.  
 22 Q. It would not be financially burdensome for  
 23 you to hire someone to help collect any documents  
 24 that might be needed in this case, would it?  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. You have millions and millions of dollars  
 3 available to your disposal to satisfy any need for  
 4 assistance in responding to discovery in this case,  
 5 true?  
 6 A. Fifth.  
 7 Q. You have legions -- well, let me strike  
 8 that.  
 9 How many lawyers do you have working on  
 10 this case for you?  
 11 A. Fifth.  
 12 Q. It's true that you have multiple lawyers  
 13 assisting you on this case, true?  
 14 A. Fifth.  
 15 Q. How much are you paying your lawyers to  
 16 assist you on this case?  
 17 A. Fifth.  
 18 MR. GOLDBERGER: And attorney-client  
 19 privilege.  
 20 BY MR. CASSELL:  
 21 Q. You and Maxwell became what could be  
 22 reasonably described as boyfriend and girlfriend in  
 23 about the mid 1990s, true?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation. Asked and answered.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Since you became boyfriend and girlfriend,  
 5 you have given Maxwell significant amount --  
 6 significant amounts of money, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth. Let's take a  
 10 break.  
 11 VIDEO TECHNICIAN: Off the record at  
 12 10:34.  
 13 (A recess was taken.)  
 14 VIDEO TECHNICIAN: On the record at  
 15 10:44.  
 16 BY MR. CASSELL:  
 17 Q. How much money have you given Maxwell since  
 18 1996?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Since 1996, you have given Maxwell  
 24 significant -- significant amounts of money, true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. For long periods of time since 1996, you  
 6 have paid Maxwell's living expenses, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. What do you know about the payment of  
 12 Maxwell's living expenses since 1996?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Please describe all the gifts you provided  
 18 for Maxwell.  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Since 1996, you have purchased expensive  
 24 gifts for Maxwell, true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Please describe any funding you provided  
 6 for Maxwell's charities.  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Since 1996, you've provided significant  
 12 funding for Maxwell's charities, true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Have you ever given Maxwell access to any  
 18 of your credit cards or bank accounts?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Since 1996, you've given Maxwell access to  
 24 some of your credit card and bank accounts, true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4  
 5 BY MR. CASSELL:  
 6 Q. How did Maxwell buy her town home in  
 7 New York?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. You bought Maxwell a town home in New York,  
 13 true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. What reason were you -- what reason did you  
 19 have for giving Maxwell gifts?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. One of the reasons you gave Maxwell gifts  
 25 was so -- so that she would continue recruiting girls

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1 J. Epstein - Confidential  
 2 for you for sex, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Directly or indirectly, you gave Maxwell  
 8 money to hire a paid image consultant named Ross Gow,  
 9 true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. What do you know about an image consultant  
 15 in England named Ross Gow?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You gave Maxwell money to hire a lawyer  
 21 named Phil Bard in England, true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25 BY MR. CASSELL:

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1 J. Epstein - Confidential  
 2 Q. Please tell me everything you know about a  
 3 lawyer named Phil Bard in England.  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Have you ever transferred a significant  
 9 amount of money to Maxwell in the last several years?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Within the last several years, you  
 15 transferred \$500,000 to Maxwell, true?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Tell me what you know about who is paying  
 21 for Maxwell's attorneys now.  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Directly or indirectly you're paying for  
 4 Maxwell's attorneys now, true?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Since January 1st, 2015, what things of  
 10 value or money have you transferred to Maxwell?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. You have told various people that you own  
 16 the Palm Beach Police Department, true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. In the period 1999 to 2005, what kind of  
 22 donations did you make to the Palm Beach Police  
 23 Department or to any organization associated with the  
 24 Palm Beach Police Department?  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. Have you ever made donations to any  
 3 organizations associated with the Palm Beach Police  
 4 Department?  
 5 A. Fifth.  
 6 Q. Have you ever used money to influence the  
 7 testimony of a witness in a legal proceeding?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 (Plaintiff's Exhibit JE4, E-mail that  
 12 Jeffrey Epstein sent to Maxwell on January 12th, 2015  
 13 was marked for identification.)  
 14 BY MR. CASSELL:  
 15 Q. Let me show you what's been marked as JE4,  
 16 I think, we're up to, and copies for opposing  
 17 counsel.  
 18 Do you have that document in front of you,  
 19 sir?  
 20 A. Yes.  
 21 Q. Do you recognize this document?  
 22 A. Fifth.  
 23 Q. This is, in fact, an e-mail that you sent  
 24 to Maxwell on January 12th, 2015, true?  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. What is this document?  
 3 A. Fifth.  
 4 Q. The first few words in this e-mail are,  
 5 "You can issue a reward to any of Virginia's  
 6 friends" -- and it appears to be acquaintances,  
 7 although there's a spelling issue.  
 8 Do you see that -- those first few words?  
 9 A. Yes.  
 10 Q. When you referred to "a reward" in this  
 11 e-mail, you were referring to cash payments, true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. What did you mean by the term "reward" in  
 17 this e-mail?  
 18 A. Fifth.  
 19 Q. In the e-mail you said that "The strongest  
 20 is the Clinton dinner."  
 21 Do you see that reference in this e-mail?  
 22 It's on the second line.  
 23 A. Yes.  
 24 Q. What did you mean by the term "strongest"  
 25 in this?

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1 J. Epstein - Confidential  
 2 MR. GOLDBERGER: Let me go back and  
 3 clarify.  
 4 The question was, do -- do you -- not  
 5 that he said it, but do you see this?  
 6 MR. CASSELL: That's right. No, I'm  
 7 not trying to pull a fast one here. Yeah.  
 8 MR. GOLDBERGER: Okay.  
 9 MR. CASSELL: I just want to circle in on  
 10 that word "strongest." And now I want to  
 11 ask you a question that does call for his  
 12 knowledge.  
 13 BY MR. CASSELL:  
 14 Q. What did you mean by the term "strongest"  
 15 in this e-mail?  
 16 A. Fifth.  
 17 Q. Isn't it true, sir, that by the term  
 18 "strongest," you meant that you had taken steps to  
 19 conceal the presence of Bill Clinton on your island?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Isn't it true, sir, that part of what you  
 25 meant by the term "strongest" is that you knew it

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1 J. Epstein - Confidential  
 2 would be difficult for Virginia to find support for  
 3 her testimony?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Please describe all dinners you've ever had  
 9 with Bill Clinton.  
 10 A. Fifth.  
 11 Q. Please describe all dinners you and Maxwell  
 12 have ever had with Bill Clinton.  
 13 A. Fifth.  
 14 Q. Please describe all dinners you, Maxwell,  
 15 and Virginia have had together with Bill Clinton.  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You have helped Maxwell feed information to  
 21 the media to try to undercut Virginia's credibility,  
 22 true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Please describe all steps you've taken to  
 4 assist Maxwell in getting information to the media  
 5 about the circumstances surrounding this case.  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. You helped Maxwell obtain information about  
 11 a Florida police report that Virginia made of a rape,  
 12 true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. How did you obtain a copy of a police  
 18 report involving sexual assault on a minor,  
 19 specifically Virginia?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. It's true, sir, that you did obtain a copy  
 25 of a police report involving a sexual assault on

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1 J. Epstein - Confidential  
 2 Virginia, true?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Have you ever helped Maxwell leak any  
 8 reports to the media?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. You helped Maxwell leak a report about a  
 14 sexual assault committed against Virginia when she  
 15 was a minor to the media, true?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You have been evading service of process  
 21 the last few months, true, sir?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. If we wanted to serve you with legal  
 4 process in the future, what would be the simplest way  
 5 to do that?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Are you willing to have your attorney  
 11 accept service of process on your behalf for future  
 12 proceedings in this case?  
 13 A. Fifth.  
 14 Q. If Miss Giuffre required your testimony at  
 15 trial in this case, would you be willing to appear  
 16 voluntarily?  
 17 A. Fifth.  
 18 Q. If you are not willing to appear  
 19 voluntarily at the upcoming trial, how can we serve  
 20 you with process to appear?  
 21 A. Fifth.  
 22 Q. When was the last time you traveled  
 23 overseas?  
 24 A. Fifth.  
 25 Q. Please describe all your overseas travel in

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1 J. Epstein - Confidential  
 2 the last two years.  
 3 A. Fifth.  
 4 Q. How do you travel overseas?  
 5 A. Fifth.  
 6 Do you want this?  
 7 (Plaintiff's Composite Exhibit JE5, E-mail  
 8 Jeffrey Epstein received from Ms. Maxwell on about  
 9 July 18th, 2009 was marked for identification.)  
 10 BY MR. CASSELL:  
 11 Q. Thanks. Thank you.  
 12 I'm going to direct your attention now to  
 13 an exhibit, which I'll mark JE5. It's a composite  
 14 exhibit. I'm just looking at the first page of this  
 15 composite exhibit right now.  
 16 Do you see JE5, also known as Maxwell 14,  
 17 in front of you, sir?  
 18 A. Yes.  
 19 Q. This is an e-mail you received from  
 20 Ms. Maxwell on about July 18th, 2009, true?  
 21 A. Fifth.  
 22 Q. There's an e-mail address [REDACTED]  
 23 Do you see that e-mail on this document?  
 24 A. Yes.  
 25 Q. You understand that to be an e-mail that

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1 J. Epstein - Confidential  
 2 belonged to Ms. Maxwell, true?  
 3 A. Fifth.  
 4 Q. You see on this document an e-mail address  
 5 known as jeevacation@Gmail.com? Do you see that  
 6 notation?  
 7 A. Yes.  
 8 Q. That's your e-mail address, true?  
 9 A. Fifth.  
 10 Q. Ms. Maxwell wrote to you, "How old was  
 11 Virginia in 1998 when she claims she started working  
 12 for you?"  
 13 Isn't that true?  
 14 A. I'm sorry. What's the question?  
 15 MR. PAGLIUCA: Did you see that or --  
 16 THE WITNESS: Do I see that or which --  
 17 I see it.  
 18 BY MR. CASSELL:  
 19 Q. Yeah. You see it.  
 20 Isn't that true that's a sentence that  
 21 Ms. Maxwell wrote to you, at least that's your  
 22 understanding?  
 23 A. Fifth.  
 24 Q. When you received that e-mail from  
 25 Ms. Maxwell, it's your understanding that Ms. Maxwell

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1 J. Epstein - Confidential  
 2 was using the term "Virginia" to refer to Virginia  
 3 Roberts Giuffre, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. You see the term "Virginia" on this  
 9 document?  
 10 A. Yes.  
 11 Q. Who do you understand that term to refer  
 12 to?  
 13 A. Fifth.  
 14 Q. Who do you understand this e-mail to have  
 15 come from?  
 16 A. Fifth.  
 17 Q. Who do you understand received this e-mail?  
 18 A. Fifth.  
 19 Q. You and Ms. Maxwell were working together  
 20 to try defend the civil lawsuit that Virginia had  
 21 filed against you, true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Sorry. Say it gain.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. You and Miss Maxwell were working together  
 4 to try to defend the civil lawsuit that Virginia  
 5 filed against you at this time, true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 MR. GOLDBERGER: Against Mr. Epstein,  
 9 not against Ms. Maxwell?  
 10 MR. CASSELL: Correct.  
 11 MR. GOLDBERGER: Thank you.  
 12 THE WITNESS: Sorry. Okay.  
 13 MR. CASSELL: Let me just ask --  
 14 MR. GOLDBERGER: Okay.  
 15 BY MR. CASSELL:  
 16 Q. It's true, sir, that in July of 2009,  
 17 Virginia had a lawsuit pending against you, right?  
 18 A. Fifth.  
 19 MR. CASSELL: And you're taking the  
 20 Fifth with regard to a publicly-filed  
 21 lawsuit, I understand it; is that right?  
 22 MR. GOLDBERGER: That's correct.  
 23 BY MR. CASSELL:  
 24 Q. Did you respond to this e-mail?  
 25 MR. WEINBERG: I will also assert the

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1 J. Epstein - Confidential  
 2 attorney-client privilege to the extent  
 3 Mr. Epstein's knowledge of the lawsuit or  
 4 the date of the lawsuit emanates from the  
 5 attorney-client communication.  
 6 MR. GOLDBERGER: Did you not get that?  
 7 THE COURT REPORTER: No.  
 8 MR. GOLDBERGER: I'll -- I'll rephrase  
 9 it.  
 10 In addition to the Fifth Amendment  
 11 privilege, we are invoking attorney-client  
 12 privilege to the extent that any knowledge  
 13 that Mr. Epstein has about a lawsuit filed  
 14 against him by someone by the name of  
 15 Virginia Roberts came to him from attorneys.  
 16 BY MR. CASSELL:  
 17 Q. Did you respond to this e-mail, sir?  
 18 A. Fifth.  
 19 Q. It's true, sir, that you responded to this  
 20 e-mail, right?  
 21 A. Fifth.  
 22 Q. And your response was along the lines of  
 23 coordinating with Maxwell as to how best to defend  
 24 the lawsuit against you?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 (Plaintiff's Exhibit JE6, E-mail string  
 5 between Jeffrey Epstein and Ms. Maxwell on  
 6 about March 25th, 2011 was marked for  
 7 identification.)  
 8 BY MR. CASSELL:  
 9 Q. All right. Let's go to another document,  
 10 which I'll mark as JE6.  
 11 Do you see JE6 in front of you?  
 12 A. Yes.  
 13 Q. This is an e-mail string between you and  
 14 Ms. Maxwell on about March 25th, 2011, right?  
 15 MR. GOLDBERGER: There appears to be  
 16 one e-mail only.  
 17 Do you have the right exhibit?  
 18 MR. CASSELL: Oh, I'm sorry. No -- are  
 19 we looking at the same thing? I see one  
 20 e-mail and then a second one.  
 21 MR. GOLDBERGER: I'm sorry.  
 22 BY MR. CASSELL:  
 23 Q. This appears to be a -- an e-mail from  
 24 Maxwell to you, followed by an e-mail from you to  
 25 Maxwell, correct?



1 J. Epstein - Confidential  
 2 A. Fifth.  
 3 Q. This is an e-mail -- well, let me see.  
 4 Maxwell sent you an e-mail to the effect of  
 5 "Any news on V work story? Am I right not allowed  
 6 full-time employment at 15?"  
 7 That's what she sent to you, right?  
 8 A. I'm sorry. Do you -- is that -- are you  
 9 asking me that's what it says on this document?  
 10 Q. No. I'm asking you, was it your  
 11 understanding that Maxwell was sending you that  
 12 question, right?  
 13 A. Fifth.  
 14 Q. And you responded by saying, "Are you  
 15 getting what you need?"  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: I'm sorry. Are you  
 19 asking me if that's what it says?  
 20 BY MR. CASSELL:  
 21 Q. No. I'm asking, is that what you  
 22 responded?  
 23 A. Fifth.  
 24 Q. It's true, sir, that you responded to an  
 25 e-mail from Maxwell on about March 25th, 2011, right?

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 2 A. Fifth.  
 3 Q. What did you say in response to Maxwell's  
 4 question?  
 5 A. Fifth.  
 6 MR. CASSELL: Just so the record is  
 7 clear, this is also identified as  
 8 confidential GM-00649. Hang on one second.  
 9 BY MR. CASSELL:  
 10 Q. By the phrase "V work story," you  
 11 understood Ms. Maxwell to be referring to Virginia's  
 12 age at the time Maxwell first met Virginia, true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. What did you understand the phrase "V work  
 18 story" to mean?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. And by the phrase "getting what you need,"  
 24 you meant getting materials to try to cover up your  
 25 sexual abuse of Virginia, right?

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 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. In this e-mail and other communications,  
 7 you and Maxwell were trying to cover up sexual abuse  
 8 of Virginia, right?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. By the phrase "getting what you need," what  
 14 did you mean?  
 15 A. Fifth.  
 16 Q. All right. One more --  
 17 A. Here you go.  
 18 Q. Oh, did you instruct Maxwell to delete any  
 19 e-mails at the time?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Did you instruct Maxwell to delete her  
 25 e-mails in 2015?

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 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 (Plaintiff's Exhibit JE7, Transcription of  
 6 a string of e-mails between Jeffrey Epstein and Ms.  
 7 Maxwell in about May of 2011 was marked for  
 8 identification.)  
 9 BY MR. CASSELL:  
 10 Q. Mark this as JE6 --  
 11 MR. PAGLIUCA: Seven.  
 12 MR. CASSELL: Oh, seven? Thank you.  
 13 Thanks, Jeff.  
 14 THE WITNESS: Thank you.  
 15 BY MR. CASSELL:  
 16 Q. Do you have JE7 in front of you?  
 17 A. Yes.  
 18 Q. This is, in fact, an accurate transcription  
 19 of a string of e-mails between you and Ms. Maxwell in  
 20 about May of 2011?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. What is this document?

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 2 A. Fifth.  
 3 Q. As reflected in this document, you sent an  
 4 e-mail on May 3rd, 2011, to Maxwell that read, "Where  
 5 are you? The pictures of you look good. Don't  
 6 fret."  
 7 That's what you sent to her, right?  
 8 A. Again, you're asking me, is that what it  
 9 says on the paper?  
 10 Q. No. I'm asking a substantive question.  
 11 Is this what you sent to her?  
 12 A. Fifth.  
 13 Q. You sent that e-mail to her, didn't you?  
 14 A. Fifth.  
 15 Q. Who sent that e-mail to her?  
 16 A. Fifth.  
 17 Q. When you wrote -- wrote the words, "Don't  
 18 fret," you meant that you were taking steps to avoid  
 19 further distribution to press stories about your  
 20 sexual abuse of Virginia, right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. What did you mean by the words "Don't fret"

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 2 Q. What did you mean when you wrote those  
 3 words?  
 4 A. Fifth.  
 5 Q. In fact, sir, those words mean that you  
 6 wanted a person named -- strike that.  
 7 In fact, what that e-mail means is that you  
 8 were offering to Maxwell that a woman named [REDACTED]  
 9 would pretend to be your girlfriend during the time,  
 10 right?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. The reason you and Maxwell were  
 16 communicating at this time was to try to work  
 17 together to attack Virginia's credibility, true?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Why were you and Maxwell communicating at  
 23 this time?  
 24 A. Fifth.  
 25 Q. You and Maxwell were communicating to try

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 2 in the e-mail?  
 3 A. Fifth.  
 4 We done?  
 5 Q. Yeah.  
 6 (Plaintiff's Exhibit JE8, E-mail that  
 7 Jeffrey Epstein sent to Maxwell on January 15th, 2015  
 8 was marked for identification.)  
 9 BY MR. CASSELL:  
 10 Q. I'm going to mark an exhibit here as JE8.  
 11 Do you have JE8 in front of you?  
 12 A. Yes.  
 13 MR. CASSELL: It's also Maxwell 18 and  
 14 also GM001081, for the record.  
 15 BY MR. CASSELL:  
 16 Q. This is an e-mail that you sent to Maxwell  
 17 on January 15th, 2015, isn't it?  
 18 A. Fifth.  
 19 Q. Who sent this e-mail on January 15, 2015?  
 20 A. Fifth.  
 21 Q. This e-mail says, do you want [REDACTED]  
 22 to come out and say she was the girlfriend, during  
 23 the time period?  
 24 Do you see that there?  
 25 A. Yes.

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 2 an invent a story to conceal the fact that the two of  
 3 you had sexually abused Virginia, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. When you used the phrase "to come out and  
 9 say," what did you mean?  
 10 A. Fifth.  
 11 Q. In fact, you were trying to get someone to  
 12 come out to falsely claim to be your girlfriend at  
 13 that time, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. And the reason you needed someone to say  
 19 that they were your girlfriend at the time was to  
 20 cover up the fact that Maxwell was your girlfriend at  
 21 the time, right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. With regard to the time period referred to  
 4 in this e-mail, who was your girlfriend?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. In fact, during the time when Virginia was  
 10 with you, Maxwell was your girlfriend, right?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Who was your girlfriend when Virginia was  
 16 with you?  
 17 MR. PAGLIUCA: Object to form.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Did Maxwell respond to this e-mail?  
 21 A. Fifth.  
 22 Q. In fact, Maxwell did respond to this  
 23 e-mail, true?  
 24 A. Fifth.  
 25 Q. You and Maxwell decided together that

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1 J. Epstein - Confidential  
 2 trying to pass off Shelly as your girlfriend who be  
 3 too easily exposed as a lie, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Please describe the plan that you and  
 9 Maxwell came up with to respond to Virginia's  
 10 allegations that she had been sexually abused by the  
 11 two of you.  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. In fact, you two came up with a plan to try  
 17 to attack Virginia's credibility, right?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Now, if we go to 2009 -- we're done with  
 23 that document.  
 24 A. Okay.  
 25 Q. In 2009, Ms. Giuffre, proceeding under the

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 2 pseudonym Jane Doe 102, filed a public lawsuit  
 3 against you for sexual abuse, right?  
 4 A. Fifth and attorney-client.  
 5 MR. GOLDBERGER: I'll assert the  
 6 attorney-client privilege for you.  
 7 BY MR. CASSELL:  
 8 Q. It's a matter of public record that you  
 9 later settled that lawsuit, right?  
 10 A. Fifth.  
 11 MR. GOLDBERGER: And attorney-client  
 12 privilege. And confidentiality of any  
 13 agreement that may have existed.  
 14 BY MR. CASSELL:  
 15 Q. How much money, if any, did you pay to  
 16 settle that lawsuit?  
 17 A. Fifth.  
 18 MR. GOLDBERGER: Attorney-client  
 19 privilege and confidentiality of any  
 20 agreement that may or may not have existed.  
 21 BY MR. CASSELL:  
 22 Q. That lawsuit involved two parties, you and  
 23 Ms. Giuffre, right?  
 24 A. Fifth.  
 25 Q. It is you who is insisting on

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1 J. Epstein - Confidential  
 2 confidentiality of the settlement of that lawsuit,  
 3 right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 MR. GOLDBERGER: Attorney-client  
 8 privilege.  
 9 BY MR. CASSELL:  
 10 Q. If Virginia were to provide to Maxwell the  
 11 confidential settlement agreement, that would be, to  
 12 your personal understanding, a violation of the terms  
 13 of the settlement agreement?  
 14 A. Fifth.  
 15 MR. GOLDBERGER: And attorney-client  
 16 privilege.  
 17 BY MR. CASSELL:  
 18 Q. You could sue Virginia if she gave Maxwell  
 19 the confidential settlement agreement, right?  
 20 A. Fifth.  
 21 MR. GOLDBERGER: Attorney-client  
 22 privilege.  
 23 Do you want to give me a standing  
 24 objection to attorney-client privilege on --  
 25 on any of the questions concerning the

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1 J. Epstein - Confidential  
 2 settlement agreement?  
 3 MR. CASSELL: Yes.  
 4 MR. GOLDBERGER: Okay.  
 5 MR. WEINBERG: And a standing -- and a  
 6 standing objection to these questions are  
 7 based, if there is a confidentiality  
 8 agreement, on the agreement, which is  
 9 subject to confidentiality.  
 10 MR. PAGLIUCA: Which I have asked for  
 11 and don't have.  
 12 MR. CASSELL: Right. Which is why --  
 13 well, in any event.  
 14 BY MR. CASSELL:  
 15 Q. Sir, you are willing to sign an  
 16 unconditional waiver allowing Virginia to turn over  
 17 the settlement agreement to Maxwell, right?  
 18 A. Fifth.  
 19 Q. Now, if we talk about the 2009 litigation  
 20 between you and Maxwell, during that litigation you  
 21 conveyed threats to Virginia?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Indirectly you threatened Virginia with  
 4 harm if she did not agree to your proposed settlement  
 5 terms, true?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Without disclosing any amount that you  
 11 ultimately paid, if any, it was your intent that your  
 12 threats would reduce the amount that you would have  
 13 to pay to Virginia, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Please describe all the threats you've ever  
 19 made to Virginia.  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Sir, you know Harvard Law Professor, now  
 25 former law professor, Alan Dershowitz?

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1 J. Epstein - Confidential  
 2 A. Fifth.  
 3 Q. When did you first meet Alan Dershowitz?  
 4 A. Fifth.  
 5 Q. It would be fair to describe  
 6 Alan Dershowitz as a good friend of yours, true?  
 7 A. Fifth.  
 8 Q. Please describe your relationship with  
 9 Alan Dershowitz.  
 10 A. Fifth.  
 11 Q. Alan Dershowitz has sent drafts of books he  
 12 was writing for you to review, right?  
 13 A. Fifth.  
 14 Q. What books of Alan Dershowitz' have you  
 15 read?  
 16 A. Fifth.  
 17 Q. What drafts of Alan Dershowitz' have you  
 18 read?  
 19 A. Fifth.  
 20 Q. Dershowitz was your lawyer as well as your  
 21 friend, right?  
 22 A. Fifth.  
 23 Q. Without discussing any particular  
 24 attorney-client communications, what was the general  
 25 type of legal work he did for you?

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 2 A. Fifth.  
 3 MR. WEINBERG: Attorney-client  
 4 privilege.  
 5 MR. CASSELL: Attorney-client  
 6 privilege? Oh, okay.  
 7 BY MR. CASSELL:  
 8 Q. When did Dershowitz first become your  
 9 lawyer?  
 10 MR. WEINBERG: Attorney-client  
 11 privilege.  
 12 MR. CASSELL: The date is  
 13 attorney-client privilege?  
 14 MR. WEINBERG: Yes.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. It is true, sir, that Dershowitz first  
 18 became your lawyer in about 1999, right?  
 19 MR. WEINBERG: Attorney-client  
 20 privilege.  
 21 BY MR. CASSELL:  
 22 Q. Has Dershowitz ever provided business  
 23 advice for you?  
 24 A. Fifth.  
 25 Q. Has Dershowitz ever provided you business

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 2 advice of a nonlegal nature?  
 3 A. Fifth.  
 4 Q. Have you had any business relationships of  
 5 any kind with Dershowitz?  
 6 A. Fifth.  
 7 Q. It's true, sir, that you have had business  
 8 relationships with Dershowitz, right?  
 9 A. Fifth.  
 10 Q. In 1999, you had business relationships  
 11 with Dershowitz, true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. When was the last time you spoke to  
 17 Alan Dershowitz?  
 18 A. Fifth.  
 19 Q. I want to focus your attention to the time  
 20 frame immediately after December 30th, 2014, when  
 21 Virginia's allegations were first made in a court  
 22 filing.  
 23 If we talk about that time frame, did you  
 24 discuss Virginia's allegations with Dershowitz?  
 25 MR. GOLDBERGER: You got it, Marty, or

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 2 THE WITNESS: Fifth.  
 3 MR. GOLDBERGER: Attorney-client  
 4 privilege to the extent I understand what  
 5 "agent" means.  
 6 BY MR. CASSELL:  
 7 Q. Did you authorize Dershowitz to make any  
 8 public statements on your behalf?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 MR. GOLDBERGER: Attorney-client  
 12 privilege.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. If Dershowitz made any public statements  
 16 about your views on Virginia, were those authorized?  
 17 MR. GOLDBERGER: Attorney-client  
 18 privilege?  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Did you ever tell Dershowitz that you were  
 22 outraged by Virginia's statements?  
 23 A. Fifth.  
 24 MR. GOLDBERGER: Attorney-client  
 25 privilege.

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 2 I'll -- I'm on -- why don't I just do it,  
 3 because they're having a hard time hearing  
 4 you.  
 5 MR. WEINBERG: Okay.  
 6 MR. GOLDBERGER: Thank you. And  
 7 attorney-client privilege.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. You did discuss Virginia's allegations with  
 11 Dershowitz, didn't you?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 MR. GOLDBERGER: And attorney-client  
 16 privilege.  
 17 BY MR. CASSELL:  
 18 Q. Was he your lawyer at that time, sir?  
 19 A. Fifth.  
 20 MR. GOLDBERGER: Attorney-client  
 21 privilege.  
 22 BY MR. CASSELL:  
 23 Q. Was he your agent at that time?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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 2 BY MR. CASSELL:  
 3 Q. In fact, sir, you've never told Dershowitz  
 4 that you were outraged by Virginia's statements, did  
 5 you?  
 6 A. Fifth.  
 7 MR. GOLDBERGER: And attorney-client  
 8 privilege.  
 9 BY MR. CASSELL:  
 10 Q. The reason you never told Dershowitz that  
 11 is that you knew that Virginia's statements were  
 12 true, didn't you?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. When Alan Dershowitz said, "He's as  
 18 outraged as I am," referring to you, that was not a  
 19 true statement, was it?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 MR. GOLDBERGER: And attorney-client  
 24 privilege.  
 25

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Was that an authorized statement on your  
 4 behalf by Alan Dershowitz?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 MR. GOLDBERGER: Attorney-client  
 9 privilege.  
 10 BY MR. CASSELL:  
 11 Q. In 2000 and 2001, Dershowitz came to visit  
 12 you at your Florida mansion in Palm Beach, true?  
 13 A. Fifth.  
 14 MR. GOLDBERGER: Attorney-client  
 15 privilege.  
 16 BY MR. CASSELL:  
 17 Q. In 2000 and 2001, Dershowitz came to visit  
 18 you in your New York mansion, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 MR. GOLDBERGER: Attorney-client  
 23 privilege.  
 24 BY MR. CASSELL:  
 25 Q. In 2001 and 2001, Dershowitz visited your

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 2 BY MR. CASSELL:  
 3 Q. Has Dershowitz ever walked into a room  
 4 where you and Virginia were interacting sexually?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. It's true, sir, that Dershowitz did walk  
 10 into a room and when you Virginia were interacting  
 11 sexually, right?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. Please describe the circumstances  
 17 surrounding Dershowitz walking into a room with you  
 18 and Virginia interacting sexually.  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Your sexual preference is for minor girls,  
 24 right?  
 25 MR. PAGLIUCA: Object to form and

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 2 ranch named Zorro in the Greater Santa Fe, New Mexico  
 3 area several times, true?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 MR. GOLDBERGER: Attorney-client  
 8 privilege.  
 9 BY MR. CASSELL:  
 10 Q. In 2000 and 2001 Dershowitz visited your  
 11 island in the U.S. Virgin Islands as well, true?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 MR. GOLDBERGER: Attorney-client.  
 16 BY MR. CASSELL:  
 17 Q. If we focus in on the years 2000 and 2001,  
 18 how many times did Dershowitz visit you in your  
 19 various homes?  
 20 A. Fifth.  
 21 Q. Please describe all your interactions with  
 22 Dershowitz in 2000 and 2001.  
 23 A. Fifth.  
 24 MR. GOLDBERGER: Attorney-client  
 25 privilege.

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 2 foundation. Asked and answered.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. If we focus in on the period just 2005 to  
 6 2006, at that time, you were targeting minor girls  
 7 for sexual abuse, true?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. If we focus in just on the year 2005, in  
 13 that year you were targeting minor girls for sexual  
 14 abuse, right?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Your sexual abuse came to the attention of  
 20 law enforcement authorities in 2005, right?  
 21 A. Fifth.  
 22 Q. And thereafter your defense attorneys  
 23 negotiated a non-prosecution agreement for you with  
 24 the U.S. Attorney's Office, true?  
 25 A. Fifth.

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 2 MR. GOLDBERGER: And attorney-client  
 3 privilege.  
 4 BY MR. CASSELL:  
 5 Q. One of the attorneys negotiating on your  
 6 behalf was Alan Dershowitz, true?  
 7 A. Fifth.  
 8 MR. GOLDBERGER: Attorney-client.  
 9 (Plaintiff's Exhibit JE9, Document 361-46  
 10 on the public record in the case Jane Doe versus  
 11 United States 908CD80736 in the Southern District of  
 12 Florida, a document signed by Gerald Lefcourt and  
 13 Alan Dershowitz was marked for identification.)  
 14 BY MR. CASSELL:  
 15 Q. I want to show you now an exhibit which  
 16 we'll mark as JE9, which I'll note, for the record,  
 17 is Document 361-46 on the public record in the case  
 18 Jane Doe versus United States 908CD80736 in the  
 19 Southern District of Florida.  
 20 This is a document signed by  
 21 Gerald Lefcourt and Alan Dershowitz, as you can see  
 22 on the last page.  
 23 A. I see the last page.  
 24 Q. All right. This was a statement sent on  
 25 your behalf to prosecutors in that -- in the criminal

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 2 investigation and case in the Southern District of  
 3 Florida, right?  
 4 A. I'm sorry. Say again.  
 5 Q. This is a document or a statement sent on  
 6 your behalf to prosecutors in the criminal  
 7 investigation and case in the Southern District of  
 8 Florida?  
 9 A. That's what it says.  
 10 Q. If Alan Dershowitz were to write in this  
 11 letter that "Epstein never targeted minors," that  
 12 would be a false statement, wouldn't it?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. In fact, you had told Alan Dershowitz that  
 18 you had targeted minors?  
 19 MR. WEINBERG: Attorney-client privilege.  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. And without regard to any communications  
 25 that you may or may not have had with Mr. Dershowitz,

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1 J. Epstein - Confidential  
 2 Mr. Dershowitz had observed you having sexual  
 3 interactions with at least one minor --  
 4 MR. PAGLIUCA: Object to form --  
 5 BY MR. CASSELL:  
 6 Q. -- at the time you wrote this letter,  
 7 right?  
 8 MR. PAGLIUCA: I'm sorry. I don't know  
 9 if I spoke over you the last --  
 10 Did you get the question?  
 11 THE COURT REPORTER: No -- yes, but...  
 12 Objection --  
 13 MR. PAGLIUCA: Okay. Yeah.  
 14 Object to form and foundation.  
 15 THE COURT REPORTER: Thank you.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Two of the attorneys in the U.S. Attorney's  
 19 Office at that time were Matthew Menchel and  
 20 Andrew Lurie, true?  
 21 A. That's what it says on the document.  
 22 Q. And you also -- you knew that there were  
 23 two U.S. Attorneys in the office at that time by the  
 24 name of Matthew Menchel and Andrew Lurie, right?  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 MR. GOLDBERGER: And attorney-client  
 3 privilege.  
 4 MR. CASSELL: Attorney-privilege of  
 5 prosecutors?  
 6 MR. GOLDBERGER: Of what he knew.  
 7 MR. CASSELL: Okay. I got you.  
 8 BY MR. CASSELL:  
 9 Q. While you were negotiating with the U.S.  
 10 Attorney's Office, you were also working with Menchel  
 11 and Lurie to help them secure lucrative employment  
 12 when they left the office, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. What do you know about the current  
 18 employment of Matthew Menchel?  
 19 A. Fifth.  
 20 Q. What do you know about the current  
 21 employment of Andrew Lurie?  
 22 A. Fifth.  
 23 Q. Please describe all of the circumstances  
 24 you are aware of concerning Matthew Menchel's  
 25 departure from the U.S. Attorney's Office.

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1 J. Epstein - Confidential  
 2 A. Fifth.  
 3 Q. Please describe all the circumstances you  
 4 are aware of involving the departure of Andrew Lurie  
 5 from the U.S. Attorney's Office.  
 6 A. Fifth.  
 7 Q. One person you sexually trafficked Virginia  
 8 to was then Harvard Law Professor Allan Dershowitz,  
 9 right?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. You arranged for Dershowitz to sexually  
 15 abuse Virginia in your Florida mansion, right?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. All right. You arranged for Dershowitz to  
 21 sexually abuse Virginia in your New York mansion,  
 22 right?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. You arranged for Dershowitz to sexually  
 4 abuse Virginia at your New -- New Mexico ranch,  
 5 right?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. You arranged for Dershowitz to sexually  
 11 abuse Virginia Tryland (phonetic) in the U.S. Virgin  
 12 Islands, true?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. You arranged for Dershowitz to sexually  
 18 abuse Virginia on the jet airplane you own, right?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. By the way, without any regard to sexual  
 24 conduct that you may or may not have had on your jet,  
 25 is your jet equipped with a bed?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Please describe the bed on your jet.  
 7 A. Fifth.  
 8 Q. Please describe every time Dershowitz was  
 9 inside your -- one of your homes in the presence of  
 10 girls under the age of 18.  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Maxwell was well aware of Dershowitz's  
 16 sexual abuse of Virginia, right?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Please describe all the interactions  
 22 between Dershowitz and Maxwell in your homes in the  
 23 time frame 2000 to 2001.  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Please describe all the interactions  
 5 between Maxwell and Dershowitz in any of your homes  
 6 in the time frame 2004 to 2006.  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. You have sexually trafficked Virginia to a  
 12 number of your other friends, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation. Asked and answered.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. You and Maxwell sent Virginia to have sex  
 18 with Glenn Dubin, true?  
 19 A. Yes.  
 20 Q. You and Maxwell sent Virginia to have sex  
 21 with Bill Richardson, true?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25



1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. You and Maxwell sent Virginia to have sex  
 4 with [REDACTED] true?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. You and Maxwell sent Virginia to have sex  
 10 with Marvin Minsky, true?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. You and Maxwell sent Virginia to have sex  
 16 with [REDACTED], true?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. You and Maxwell sent Virginia to have sex  
 22 with [REDACTED], true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. How did Bill Clinton get to your island  
 4 when he came to visit you?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Sir, isn't it true, Bill Clinton got to the  
 10 island by having Maxwell fly him there on a  
 11 helicopter?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. Do you own a helicopter, sir?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. In fact, sir, you own a helicopter in the  
 22 U.S. Virgin Islands for purposes of flying guests to  
 23 your private island there, right?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Please give me the names of the other men  
 4 you and Maxwell sent Virginia to have sex with.  
 5 MR. PAGLIUCA: Object to the form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Isn't it true that in the time period 2000  
 10 to 2001, you were close friends with Bill Clinton?  
 11 A. Fifth.  
 12 Q. And even into 2002 you remained close  
 13 friends with Bill Clinton, right?  
 14 A. Fifth.  
 15 Q. Bill Clinton flew on your jet a number of  
 16 times in 2002, right?  
 17 A. Fifth.  
 18 Q. For example, in May of 2002, Bill Clinton  
 19 was on your jet several times, right?  
 20 A. Fifth.  
 21 Q. Bill Clinton visited your island in the  
 22 U.S. Virgin Islands in about 2002, true?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Please describe all the ways people can get  
 5 to your private island in the U.S. Virgin Islands.  
 6 MR. PAGLIUCA: Object to form.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Maxwell frequently flew a helicopter in the  
 10 U.S. Virgin Islands, right?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Maxwell was trained to fly your helicopter  
 16 in the U.S. Virgin Islands, right?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Maxwell frequently flew a helicopter in the  
 22 U.S. Virgin Islands, right?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation. Asked and answered.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. When Bill Clinton visited your private  
 4 island in the U.S. Virgin Islands, please describe  
 5 all the steps that you took to conceal his presence  
 6 there.  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. When Bill Clinton came to your private  
 12 island in the U.S. Virgin Islands, please describe  
 13 anyone who he was accompanied by.  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. When Bill Clinton came to your island, he  
 19 was accompanied by two young women who were  
 20 approximately 18 years old, true?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Please list every place you and

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1 J. Epstein - Confidential  
 2 Bill Clinton have ever been together.  
 3 MR. PAGLIUCA: Object to form.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Please list everyplace you, Maxwell, and  
 7 Bill Clinton have been together simultaneously.  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. On May 22nd, 2002, you and Maxwell flew  
 13 with Bill Clinton on your private jet, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. On May 22nd, 2002 you and Maxwell and  
 19 Bill Clinton flew from the Atsugi Naval Air facility  
 20 in Japan to Khabarovsk, Russia, true?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. On that same trip you, Maxwell, and

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1 J. Epstein - Confidential  
 2 Bill Clinton flew to China, right?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. And you also flew to Singapore, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. And you also flew together to Bangkok?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Just so we're clear on that, in May  
 18 of 2002, you, Bill Clinton, and Defendant Maxwell all  
 19 flew to Bangkok together, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. And later, on that same trip, you, Maxwell,  
 25 and Bill Clinton all flew to Brunei together, true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. You've heard of the Clinton Foundation,  
 7 right?  
 8 A. Fifth.  
 9 Q. Please describe all of your interactions  
 10 with the Clinton Foundation.  
 11 A. Fifth.  
 12 Q. Is it true you that you helped Bill Clinton  
 13 organize the Clinton Foundation?  
 14 A. Fifth.  
 15 Q. Did you discuss with Bill Clinton the idea  
 16 of creating a foundation?  
 17 A. Fifth.  
 18 (Plaintiff's Exhibit JE10, Subpoena in this  
 19 case for Jeffrey Epstein to appear at deposition was  
 20 marked for identification.)  
 21 MR. CASSELL: I'm going to hand you one  
 22 more -- here we are. This will become JE10 in  
 23 this case. And I represent this is the subpoena  
 24 in this case to appear for the deposition. I  
 25 only got one of those.

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: I can share. That's  
 3 fine.  
 4 BY MR. CASSELL:  
 5 Q. Have you seen this document before today,  
 6 sir?  
 7 A. Fifth.  
 8 Q. I want to direct your attention to page 8  
 9 of this document regarding -- you see page 8?  
 10 A. Yes, sir.  
 11 Q. And you see there's the heading "Documents  
 12 to Be Produced Pursuant to This Subpoena"?  
 13 A. Yes.  
 14 Q. Did you bring any documents with you today  
 15 pursuant to this subpoena?  
 16 A. Fifth.  
 17 MR. WEINBERG: Mr. Epstein would assert  
 18 the Fifth Amendment as well as the act of  
 19 production for the protections against  
 20 responding to that question or producing any  
 21 documents, relying on the Supreme Court  
 22 decision in Hubble, the Second Circuit's  
 23 August 1 decision in Greenfield.  
 24 MR. CASSELL: Understood. And I'll assume  
 25 you have a standing objection based on the

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1 J. Epstein - Confidential  
 2 grounds that you just described to all my  
 3 questions with regard to this subpoena.  
 4 MR. GOLDBERGER: Just so we're clear,  
 5 the Fifth Amendment objection as to act of  
 6 production is going to apply to  
 7 everything that --  
 8 MR. CASSELL: Yeah. We disagree. But  
 9 I understand you have a Fifth Amendment and  
 10 act of production.  
 11 MR. GOLDBERGER: Yes.  
 12 MR. CASSELL: Let's just hang onto that  
 13 a second.  
 14 MR. GOLDBERGER: Sure.  
 15 BY MR. CASSELL:  
 16 Q. Sir, you've made no effort to collect any  
 17 of the documents requested here, right?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth Amendment.  
 21 BY MR. CASSELL:  
 22 Q. In the last three weeks, you've made no  
 23 search at all for the 22 categories of documents  
 24 requested here, right?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Where are the documents covered by these 22  
 6 requested categories?  
 7 A. Fifth.  
 8 Q. You have not produced any privilege log for  
 9 these items, have you?  
 10 A. Fifth.  
 11 Q. It would not be burdensome for you to  
 12 search for any of these documents, would it?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. It would be quite simple for you to run  
 18 search terms, such as Virginia, through your e-mail  
 19 accounts, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. And you have plenty of money to fund any of  
 25 the searches that would be required to produce these

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1 J. Epstein - Confidential  
 2 documents, right?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. I want to direct your attention to the  
 8 item 13, which requests all --  
 9 A. Sorry --  
 10 MR. GOLDBERGER: Page 9 of the -- of  
 11 the subpoena.  
 12 THE WITNESS: Okay.  
 13 BY MR. CASSELL:  
 14 Q. -- which request all telephone records  
 15 associated with you, including cell phone records,  
 16 from 1999 to present that shown communications with  
 17 Maxwell, Ghislaine Maxwell.  
 18 You've taken no steps to secure those  
 19 documents, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You have, in fact, received electronic and  
 25 paper records from a cellular telephone provider

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1 J. Epstein - Confidential  
 2 reflecting such calls on your cell phone, right?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. And on those records over the last  
 8 20 months would be telephone calls between you and  
 9 Maxwell, right?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. I'm going to direct your attention now to  
 15 item seven.  
 16 You have documents relating to  
 17 communications with Ghislaine Maxwell, true, sir?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. You maintain various e-mail accounts,  
 23 right?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. You have undertaken no steps to search your  
 5 e-mail accounts for communications with Ms. Maxwell,  
 6 right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. It would be a simple task for you to search  
 12 your e-mail accounts for documents associated with  
 13 communications with Maxwell, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. You have seen Ms. Maxwell commit crimes,  
 19 right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Miss Maxwell has discussed with you crimes  
 25 she has committed, right?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Please describe all the communications  
 7 you've had with Maxwell about crimes she has  
 8 committed.  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Ms. Maxwell has admitted to you that she  
 14 has sexually abused minors, right?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. You know a Renaldo Rizzo, right?  
 20 A. Fifth.  
 21 Q. You know that Renaldo Rizzo is an estate  
 22 manager for Glenn Dubin, right?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Who is Renaldo Rizzo?  
 4 A. Fifth.  
 5 Q. In about 2005, it's true, sir, that Rizzo  
 6 observed you and Maxwell in the presence of a --  
 7 presence of a 15-year-old Swedish girl named  
 8 Caroline, right?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Please describe everything you know about a  
 14 15-year-old Swedish girl named Caroline that you  
 15 interacted with in 2005?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You and Maxwell brought Caroline over to  
 21 the United States under false pretenses, right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. How did you and Maxwell convince Caroline  
 4 to come over from Sweden?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. The reason you and Maxwell brought Caroline  
 10 over from Sweden was to have sex with you, right?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Did Caroline want to have sex with you?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. What did you do to Caroline when she  
 21 refused to have sex with you?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. What did Maxwell do to Caroline when you  
 4 refused -- when she refused to have sex with you?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. Isn't it true, sir, that you tried to force  
 10 Caroline to have sex with you?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. And isn't it true you coordinated with  
 16 Maxwell to try to force Caroline to have sex with  
 17 you?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Who held Caroline's passport when she came  
 23 over from Sweden?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. Isn't it true, sir, that Maxwell held  
 5 Caroline's passport?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Isn't it true, sir, that Maxwell was  
 11 denying Caroline access to her passport in order to  
 12 try to force her to have sex with you?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Why was Maxwell holding onto Caroline's  
 18 passport?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. What devices did you use -- try to use --  
 24 strike that.  
 25 How did you try to force this 15-year-old

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1 J. Epstein - Confidential  
 2 girl to have sex with you?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Was Rizzo present at a time when you were  
 8 petting like a cat a girl who was a pre-teenage girl?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Please describe all the times in which you  
 14 have petted like a cat pre-teenage girls.  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Was Rizzo present when you had a young girl  
 20 on your lap?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Rizzo was telling the truth when he says

1 J. Epstein - Confidential  
 2 you were petting a girl like a cat, wasn't he?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. You and Ms. Maxwell have had sex with a  
 8 woman named Johanna Sjorberg, right?  
 9 MR. PAGLIUCA: Object to the form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Please describe all of your interactions  
 14 with Johanna Sjorberg.  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Please describe all of Miss Maxwell's inter  
 20 actions with Johanna Sjorberg.  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Sir, it's true that Ms. Maxwell lured

1 J. Epstein - Confidential  
 2 for sexual purposes, right?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Ms. Maxwell helped to coordinate the  
 8 arrival of girls that Figueroa brought over to your  
 9 house, right?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Please describe all interactions that you  
 15 are aware of between Ms. Maxwell and Tony Figueroa.  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You've had sex with a girl named  
 21 [REDACTED] right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

1 J. Epstein - Confidential  
 2 Sjorberg from her school under the guise of needing  
 3 someone to answer phones, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. When Miss Maxwell first interacted with  
 9 Sjorberg, Maxwell's real purpose was to try to get  
 10 Sjorberg to have sex with you, right?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. In 2005, Maxwell was around your Florida  
 16 mansion frequently, right?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. Tell me everything you know about a man  
 22 name Tony Figueroa.  
 23 A. Fifth.  
 24 Q. You asked a man named Tony Figueroa to  
 25 arrange for underage girls to come over to your home

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Who is [REDACTED]  
 4 A. Fifth.  
 5 Q. You had sex with [REDACTED] when she was  
 6 under the age of 18, right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Ms. Maxwell arranged for you to have sex  
 12 with [REDACTED] when she was under the age of 18,  
 13 right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Please describe the circumstances that led  
 19 you to have sex with [REDACTED].  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Please describe all interactions between  
 25 [REDACTED] and Ghislaine Maxwell.

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 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. You've had sex with a female named  
 7 [REDACTED] when she was under the age of 18, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Please describe all of your interactions  
 13 with [REDACTED]  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Please describe all of Maxwell's  
 19 interactions with [REDACTED].  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. It would be a fair description to say that  
 25 you and Maxwell were grooming [REDACTED] to be a sex

1 J. Epstein - Confidential  
 2 testify, she would have to testify that she is aware  
 3 of sexual abuse by you of minor girls, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Does [REDACTED] have any knowledge of your  
 9 sexual abuse of underage girls?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. It's true, sir, that [REDACTED] does have  
 15 knowledge that you sexually abused underage girls,  
 16 right?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. It's true, sir, that [REDACTED] has  
 22 knowledge that Maxwell was involved in the sexual  
 23 abuse of underage girls?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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 2 slave for you, right?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Why were you and Maxwell interacting with  
 8 [REDACTED]  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Both you and Maxwell have had sex with  
 14 [REDACTED] right?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. You remain on friendly terms with  
 20 [REDACTED] right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. If [REDACTED] were to appear at trial and

1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. To your knowledge, what does Maxwell -- I'm  
 5 sorry.  
 6 To your knowledge, what does [REDACTED]  
 7 know about Maxwell's sexual abuse of underage girls?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Sir, you are aware that in about January  
 13 of 2015, Maxwell told the media that Virginia's  
 14 allegations about sexual abuse were obvious lies,  
 15 right?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. In fact, you are not aware of any  
 21 significant thing that Virginia has said, which is an  
 22 obvious lie, right?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Please list any lies that, sitting here  
 4 today, you're aware of that Virginia has ever told.  
 5 A. Fifth.  
 6 Q. You're unwilling to identify any lies that  
 7 Virginia has ever told, right?  
 8 A. Fifth.  
 9 Q. In fact, you are unable to list any  
 10 significant lies that Virginia has ever told?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Without regard to any sexual abuse that you  
 16 may or may not have committed in the past, do you  
 17 agree that it is psychologically harmful for an adult  
 18 male to have sex with a minor female?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. What sort of psychological impact do you  
 24 think it would have for a 40-year-old man to have sex  
 25 with a 17-year-old girl?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. What kind of psychological impact do you  
 7 think it would have for a 40-year-old -- a man in his  
 8 40s to have sex with a 16-year-old girl?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. You would agree that calling someone a liar  
 14 when they're telling the truth can cause  
 15 psychological harm, right?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. What kind of impact would calling someone a  
 21 liar when they are actually telling the truth?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. You know Virginia Roberts, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Based on your interactions with  
 9 Virginia Roberts, what sort of psychological impact  
 10 do you think it had when she was called a liar by  
 11 Maxwell?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. It would have a significant psychological  
 17 harm on Virginia Roberts for Maxwell to call her a  
 18 liar about true statements, right?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Please tell me everything you know about  
 24 Nadia Marcinkova.  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. Please tell me everything you know about  
 3 Sarah Kellen.  
 4 A. Fifth.  
 5 Q. Both you and Maxwell have had sex with  
 6 Nadia Marcinkova, right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10  
 11 BY MR. CASSELL:  
 12 Q. Both you and Maxwell have had sex with  
 13 Sarah Kellen?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Please describe the role that Sarah Kellen  
 19 played in your sex trafficking organization.  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. What did Sarah Kellen do for you in 2005?  
 25 MR. PAGLIUCA: Object to form and



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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. In the years 2000 and 2001, what did  
 6 Sarah Kellen do for you?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. It's true, sir, that in 2000 and 2001  
 12 Sarah Kellen assisted you in recruiting girls for  
 13 sexual purposes, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. In 2000 and 2001, Nadia Marcinkova assisted  
 19 you in obtaining girls for sexual purposes, true?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Who did Nadia Marcinkova report to when she  
 25 worked for you?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Nadia Marcinkova reported to  
 7 Ghislaine Maxwell when she worked for you, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Who did Sarah Kellen report to when she  
 13 worked for you?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Sarah Kellen reported to Ghislaine Maxwell  
 19 when she worked for you, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. Sarah Kellen and Nadia Marcinkova sexually  
 25 abused under age girls in your presence, right?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Sarah Kellen and Nadia Marcinkova are aware  
 7 of your sexual abuse of underage girls, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Have you ever discussed the lawful age of  
 13 consent with Ghislaine Maxwell?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. What is your understanding of the age of  
 19 consent in Florida?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. You've discussed the age of consent in  
 25 Florida with Maxwell, right?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. What are the circumstances surrounding your  
 7 discussions with Maxwell of the age of consent in  
 8 Florida?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. In fact, you and Maxwell were discussing  
 14 the age of consent in Florida to try to make it  
 15 appear as though you were having sex with girls who  
 16 are above the age of consent other than below the age  
 17 of consent?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. Have you ever threatened  
 23 Alfredo Rodriguez?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. In fact, you arranged for Alfredo Rodriguez  
 5 to be threatened by Maxwell, right?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. In 2009, your attorneys attended a  
 11 deposition of Alfredo Rodriguez, right?  
 12 A. Fifth.  
 13 Q. At that time, it was in your interest to  
 14 limit the ways in which Rodriguez could expose the  
 15 sex abuse of both you and Maxwell, right?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. When Rodriguez was describing Maxwell's  
 21 involvement with underage girls, your attorneys had  
 22 an interest in attacking that testimony, right?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 MR. WEINBERG: Attorney-client

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1 J. Epstein - Confidential  
 2 privilege.  
 3 THE WITNESS: Fifth.  
 4 MR. WEINBERG: If the information came  
 5 from attorneys.  
 6 MR. CASSELL: Could we take a short  
 7 break at this time?  
 8 VIDEO TECHNICIAN: Off the record at  
 9 11:35.  
 10 (A recess was taken.)  
 11 VIDEO TECHNICIAN: Beginning of disc  
 12 three. On the record at 11:50.  
 13 BY MR. CASSELL:  
 14 Q. Sir, I want to represent to you that on  
 15 about January 2nd, 2015, Defendant Maxwell released a  
 16 statement that said, "The allegations made by  
 17 Virginia Roberts against Ghislaine Maxwell are  
 18 untrue."  
 19 That was a false statement, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. In fact, the allegations made by  
 25 Virginia Roberts against Ghislaine Maxwell were true?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Allegations Virginia made had never been  
 7 shown to be untrue, had they?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. I'll represent to you that Ms. Maxwell  
 13 released a statement that said, "Each time the story  
 14 is retold it changes with new salacious details about  
 15 public figures and world leaders." And then there's  
 16 some additional language.  
 17 You had, in fact, sexually trafficked  
 18 Virginia to public figures?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. In fact, you had trafficked Virginia to  
 24 world leaders, right?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. And Maxwell had assisted you in trafficking  
 6 Virginia to public figures and world leaders?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Please describe the public figures you and  
 12 Maxwell and Virginia interacted with.  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Please describe the world leaders you and  
 18 Virginia and Maxwell interacted with.  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. I represent to you that around January 2nd,  
 24 2015, Ms. Maxwell released this statement that  
 25 "Ms. Roberts' claims are obvious lies and should be

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 2 treated as such." Then there's some additional  
 3 language.  
 4 That statement by Ms. Maxwell was, in fact,  
 5 itself an obvious lie, right?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Miss Maxwell's reference to "obvious lies"  
 11 was inaccurate, right?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. CASSELL:  
 16 Q. In fact, given your detailed knowledge of  
 17 all the circumstances of the case, you know that that  
 18 was an obvious lie by Maxwell, right?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Is it true that Ms. Roberts' claims are  
 24 obvious lies?  
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. In fact, it is not true that Ms. Roberts'  
 6 claims are obvious lies?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 BY MR. CASSELL:  
 10 Q. Answer?  
 11 A. You didn't ask me a question.  
 12 Q. In fact, it is not true that Ms. Roberts'  
 13 claims are obvious lies, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Prince Andrew visited your New York  
 19 mansion, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. That visit occurred shortly after the  
 25 events depicted in the photograph we looked at

1 J. Epstein - Confidential  
 2 earlier?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. So that would have been in about March or  
 8 April of 2001 that Prince Andrew visited you in your  
 9 New York mansion?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Has Prince Andrew ever visited you in your  
 15 New York mansion?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. When Prince Andrew visited you in your New  
 21 York Mansion, Maxwell was there, right?  
 22 A. Fifth.  
 23 Q. Who was in your New York mansion when  
 24 Maxwell -- I'm sorry, when Prince Andrew visited?  
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Prince Andrew interacted with Virginia in  
 6 your New York mansion, right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Maxwell was present when Prince Andrew  
 12 interacted with Virginia in your New York mansion,  
 13 right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. There was a puppet in the room when Maxwell  
 19 and Virginia and Prince Andrew were all together in  
 20 your New York mansion?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. A puppet was used to fondle the breasts of

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 2 girls under the age of 18, right?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Who fondled the breasts of underage girls  
 8 in your New York mansion with a puppet?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. To your knowledge, Prince Andrew had sex  
 14 with Virginia several times, right?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. Nadia Marcinkova was controlled by  
 20 Ghislaine Maxwell, right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. We talked about the timeframe 2000 to 2001.

1 J. Epstein - Confidential  
 2 between Sarah Kellen and Ghislaine Maxwell.  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. In 2000 to 2001, Sarah Kellen was  
 8 controlled by Ghislaine Maxwell, right?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Please describe all of the relationships  
 14 Ghislaine Maxwell has with your companies and  
 15 businesses.  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. In fact, Maxwell has been a partner with  
 21 you in several of your business enterprises, right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

1 J. Epstein - Confidential  
 2 Who controlled Nadia Marcinkova?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. In 2000 to 2001, Maxwell controlled  
 8 Nadia Marcinkova, right?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. In fact, Nadia Marcinkova remains indebted  
 14 to Maxwell even today, right?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. In fact, Sarah Kellen remains indebted to  
 20 Maxwell even today, right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Describe -- describe the relationship

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 2 BY MR. CASSELL:  
 3 Q. You continue to have a very close working  
 4 relationship with Maxwell today, right?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. You and Maxwell have been coordinating  
 10 together on this litigation, right?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. You hope that Maxwell prevails in this  
 16 litigation, right?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. You and Ghislaine Maxwell regularly  
 22 transported girls across state lines for sexual  
 23 purposes, right?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
2 THE WITNESS: Fifth.  
3 BY MR. CASSELL:  
4 Q. Please describe all the situations in which  
5 you and Maxwell have been involved in the interstate  
6 transportation of girls under the age of 18.  
7 MR. PAGLIUCA: Object to form and  
8 foundation.  
9 THE WITNESS: Fifth.  
10 BY MR. CASSELL:  
11 Q. You have used cell phones and land line  
12 cell phone -- land line telephones to instruct  
13 Virginia Roberts to have sex, right?  
14 MR. PAGLIUCA: Object to form and  
15 foundation.  
16 THE WITNESS: Fifth.  
17 BY MR. CASSELL:  
18 Q. You've given instructions by telephone to  
19 Virginia Roberts to have sex with people while she is  
20 under the age of -- while she was under the age of  
21 18, right?  
22 MR. PAGLIUCA: Object to form and  
23 foundation.  
24 THE WITNESS: Fifth.  
25

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1 J. Epstein - Confidential  
2 BY MR. CASSELL:  
3 Q. You have instructed girls under the age of  
4 18 via telephone and cell phone to have sex with men,  
5 right?  
6 MR. PAGLIUCA: Object to form and  
7 foundation.  
8 THE WITNESS: Fifth.  
9 BY MR. CASSELL:  
10 Q. You've instructed girls under the age of 18  
11 by telephone to have sex with various of your  
12 friends, right?  
13 MR. PAGLIUCA: Object to form and  
14 foundation.  
15 THE WITNESS: Fifth.  
16 BY MR. CASSELL:  
17 Q. Have you ever threatened a witness not to  
18 talk?  
19 MR. PAGLIUCA: Object to form and  
20 foundation.  
21 THE WITNESS: Fifth.  
22 BY MR. CASSELL:  
23 Q. Has Ghislaine Maxwell ever threatened a  
24 witness not to talk?  
25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
2 foundation.  
3 THE WITNESS: Fifth.  
4 BY MR. CASSELL:  
5 Q. In fact, you have threatened witnesses not  
6 to talk, right?  
7 MR. PAGLIUCA: Object to form and  
8 foundation.  
9 THE WITNESS: Fifth.  
10 BY MR. CASSELL:  
11 Q. In fact, Ghislaine Maxwell has threatened  
12 witnesses not to talk, right?  
13 MR. PAGLIUCA: Object to form and  
14 foundation.  
15 THE WITNESS: Fifth.  
16 BY MR. CASSELL:  
17 Q. In about 2007, you arranged to have someone  
18 hunt down and find Virginia, right?  
19 MR. PAGLIUCA: Object to form and  
20 foundation.  
21 THE WITNESS: Fifth.  
22 BY MR. CASSELL:  
23 Q. How did you find Virginia in 2007?  
24 MR. PAGLIUCA: Object to form and  
25 foundation.

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1 J. Epstein - Confidential  
2 THE WITNESS: Fifth.  
3 BY MR. CASSELL:  
4 Q. The reason you needed to find Virginia in  
5 2007 was because the FBI had opened an investigation  
6 on you, right?  
7 MR. PAGLIUCA: Object to form and  
8 foundation.  
9 THE WITNESS: Fifth.  
10 BY MR. CASSELL:  
11 Q. When was the last time you spoke to  
12 Ms. Giuffre?  
13 MR. PAGLIUCA: Object to form and  
14 foundation.  
15 THE WITNESS: Who?  
16 BY MR. CASSELL:  
17 Q. Miss Virginia Roberts --  
18 A. Sorry. Sorry.  
19 Q. -- Giuffre. Yeah. Virginia, I should say.  
20 Yeah.  
21 A. Fifth.  
22 Q. When was the last time you spoke to  
23 Virginia?  
24 A. Fifth.  
25 Q. In fact, you and your attorney actually got

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1 J. Epstein - Confidential  
 2 together on the phone with Virginia in about 2007,  
 3 right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Which of your attorneys was on the phone  
 9 with Virginia in about 2007?  
 10 A. Fifth.  
 11 Q. Was it Mr. Goldberger?  
 12 MR. WEINBERG: Attorney-client.  
 13 MR. GOLDBERGER: And attorney-client.  
 14 I apologize. I'm sorry.  
 15 BY MR. CASSELL:  
 16 Q. This is -- I'm talking about a telephone  
 17 call where there was a third party, Virginia Roberts  
 18 Giuffre, on the phone.  
 19 That was Mr. Goldberger on the phone?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 MR. GOLDBERGER: And attorney-client  
 24 privilege.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. During the call, Mr. Epstein, you asked  
 4 Virginia if she was going to say anything to the FBI,  
 5 right?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. The clear implication of your question what  
 11 to Virginia was that she should not say anything to  
 12 the FBI, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. You told Virginia directly or indirectly  
 18 was the best thing for her and her family was to keep  
 19 quiet, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. What did you tell Virginia in 2007 when you  
 25 were on the phone with an attorney?

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1 J. Epstein - Confidential  
 2 A. Fifth.  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 BY MR. CASSELL:  
 6 Q. You suggested that those who talked to the  
 7 FBI would be harmed, all those who did not, would be  
 8 helped, right?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. And those communications you had with  
 14 Virginia in 2007 influenced the settlement of  
 15 Virginia's civil case against you in 2009?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. The first time you met Virginia  
 21 Ghislaine Maxwell came up to the room with you as  
 22 well, right?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Please describe who was in the room, your  
 4 massage room, the first time you met  
 5 Virginia Roberts.  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Ghislaine Maxwell participated in the  
 11 sexual abuse of Virginia the first time she came over  
 12 to your house, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. What kind of instructions did Maxwell give  
 18 Virginia when you first met Virginia?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. In fact, Maxwell instructed Virginia how to  
 24 sexually please you the first time she met you,  
 25 right?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 MR. CASSELL: Those are my questions at  
 6 this point. I understand Mr. Pagliuca may  
 7 have some questions, and I'll have some  
 8 follow-up based on that.  
 9 MR. GOLDBERGER: Okay. So why don't we  
 10 take ten or 15. You guys can eat your  
 11 lunch, and we'll go into my office. And  
 12 about ten, 15-minutes we'll come in.  
 13 THE WITNESS: It's 12 now. 12:15 come  
 14 back?  
 15 MR. CASSELL: That's fine.  
 16 VIDEO TECHNICIAN: Off the record at  
 17 12:00 o'clock.  
 18 (A lunch recess was taken.)  
 19 A F T E R N O O N S E S S I O N  
 20 - - -  
 21 VIDEO TECHNICIAN: On the record at  
 22 12:21.  
 23 MR. GOLDBERGER: Jeffrey, before you  
 24 ask your question, did -- did we reach the  
 25 same agreement with you that we did with

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1 J. Epstein - Confidential  
 2 Mr. Cassell concerning the more -- the  
 3 longer Fifth Amendment invocation?  
 4 MR. PAGLIUCA: Yes. In the beginning  
 5 of the deposition I indicated that that was  
 6 perfectly acceptable with me.  
 7 MR. GOLDBERGER: Okay.  
 8 MR. PAGLIUCA: And I'm also happy,  
 9 Mr. Cassell, if you want to make form and  
 10 foundation objections, I will understand  
 11 that that encompasses the totality of the  
 12 objections.  
 13 MR. CASSELL: All right.  
 14 CROSS-EXAMINATION  
 15 BY MR. PAGLIUCA:  
 16 Q. Good afternoon, Mr. Epstein. My name is  
 17 Jeff Pagliuca.  
 18 We have never met before, correct?  
 19 A. Correct.  
 20 Q. Mr. Epstein, you were asked a number of  
 21 leading questions by Mr. Cassell this morning and  
 22 into this afternoon.  
 23 You understand what a leading question is,  
 24 correct?  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. In fact, the question I just asked you was  
 3 a leading question, as an example, correct?  
 4 A. Fifth.  
 5 Q. You would agree with me that Mr. Cassell's  
 6 questions about Ms. Maxwell had no basis in fact,  
 7 correct?  
 8 MR. CASSELL: Objection to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. PAGLIUCA:  
 12 Q. You would agree with me that the purported  
 13 factual basis underlying Mr. Cassell's questions did  
 14 not occur, correct?  
 15 MR. CASSELL: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. PAGLIUCA:  
 19 Q. And you would agree with me that had you  
 20 been able to answer Mr. Cassell's questions, your  
 21 answers would have supported Ms. Maxwell in this  
 22 litigation and not supported the Plaintiff, correct?  
 23 MR. CASSELL: Object to form and  
 24 foundation, and calls for a legal  
 25 conclusion.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. PAGLIUCA:  
 4 Q. In fact, had you been able to answer, you  
 5 would have denied any sexual impropriety with the  
 6 Plaintiff in this case, formerly Ms. Roberts, now  
 7 Ms. Giuffre, correct?  
 8 MR. CASSELL: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. PAGLIUCA:  
 12 Q. And you would have denied any sexual  
 13 impropriety with any other individuals in answer to  
 14 Mr. Cassell's questions had you been able to answer,  
 15 correct?  
 16 MR. CASSELL: Form and foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. PAGLIUCA:  
 19 Q. Mr. Cassell asked you some questions about  
 20 your financial status. I'm going to repeat a couple  
 21 of those briefly.  
 22 You would agree with me that you are a very  
 23 wealthy man, correct, Mr. Epstein?  
 24 A. Fifth.  
 25 MR. CASSELL: Object to form and

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 2 foundation.  
 3 THE WITNESS: Sorry.  
 4 BY MR. PAGLIUCA:  
 5 Q. You would agree with me that you do not  
 6 depend on Ghislaine Maxwell for any financial  
 7 support, correct?  
 8 MR. CASSELL: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. PAGLIUCA:  
 12 Q. You do not have any business relationship  
 13 with Ghislaine Maxwell, correct?  
 14 MR. CASSELL: Object to form and  
 15 foundation and vague.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. You do not have any social relationship  
 19 with Ghislaine Maxwell, correct?  
 20 MR. CASSELL: Object to form and  
 21 foundation and vague.  
 22 THE WITNESS: Fifth.  
 23 BY MR. PAGLIUCA:  
 24 Q. All right. You have not spoken to  
 25 Ghislaine Maxwell in many years, correct?

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 2 MR. CASSELL: Object to form and  
 3 foundation, and vague as to what the term  
 4 "spoken" means.  
 5 THE WITNESS: Fifth.  
 6 BY MR. PAGLIUCA:  
 7 Q. You've not had any verbal communication,  
 8 meaning oral, with Ms. Maxwell for many years,  
 9 correct?  
 10 MR. CASSELL: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. PAGLIUCA:  
 14 Q. You have not physically seen Ms. Maxwell in  
 15 many years, correct?  
 16 A. Fifth.  
 17 Q. You have not --  
 18 MR. CASSELL: I'm sorry. I missed the  
 19 -- form and foundation objection.  
 20 BY MR. PAGLIUCA:  
 21 Q. You have not been in any location  
 22 contemporaneously with Ms. Maxwell in many years,  
 23 correct?  
 24 MR. CASSELL: Object to form and  
 25 foundation.

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 2 THE WITNESS: Fifth.  
 3 BY MR. PAGLIUCA:  
 4 Q. Any relationship you had, whether personal  
 5 or business, ended with Ms. Maxwell more than  
 6 15 years ago, correct?  
 7 MR. CASSELL: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. PAGLIUCA:  
 11 Q. Ms. Maxwell is not --  
 12 MR. CASSELL: I'm sorry. Could you  
 13 mark that question for me as well? The last  
 14 one.  
 15 BY MR. PAGLIUCA:  
 16 Q. Ms. Maxwell is not an employee of yours,  
 17 correct?  
 18 MR. CASSELL: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. PAGLIUCA:  
 22 Q. Ms. Maxwell is not an agent of yours,  
 23 correct?  
 24 MR. CASSELL: Object to form and  
 25 foundation. Calls for a legal conclusion.

1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. PAGLIUCA:  
 4 Q. Ms. -- Ms. Maxwell -- you are not an agent  
 5 of Ms. Maxwell's, correct?  
 6 MR. CASSELL: Object to form and  
 7 foundation. Calls for a legal conclusion.  
 8 THE WITNESS: Fifth.  
 9 BY MR. PAGLIUCA:  
 10 Q. Ms. Maxwell has never authorized you to act  
 11 on her behalf, correct?  
 12 MR. CASSELL: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 BY MR. PAGLIUCA:  
 16 Q. Ms. Maxwell does not control any of your  
 17 decisions in any way --  
 18 MR. CASSELL: Object to form --  
 19 BY MR. PAGLIUCA:  
 20 Q. -- correct?  
 21 MR. CASSELL: Sorry. Object to form  
 22 and foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. Do you understand that Ms. Maxwell opposes



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 2 you asserting any Fifth Amendment privilege in this  
 3 matter?  
 4 MR. CASSELL: Objects to form -- object  
 5 and foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. PAGLIUCA:  
 8 Q. Do you understand that Ms. Maxwell believes  
 9 that your truthful testimony in this case would be  
 10 helpful to her?  
 11 MR. CASSELL: Object to form and  
 12 foundation. Calls for speculation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. You indicated earlier that you and I have  
 16 never met.  
 17 You and I have never spoken prior to today,  
 18 correct?  
 19 MR. CASSELL: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. PAGLIUCA:  
 23 Q. You have never spoken to any member of my  
 24 law firm prior to today, correct?  
 25 MR. CASSELL: Object to form and

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 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. PAGLIUCA:  
 5 Q. In 2009, you entered into a settlement  
 6 agreement with Ms. Giuffre, formerly known as  
 7 Ms. Roberts, the Plaintiff in this case, correct?  
 8 MR. CASSELL: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 MR. GOLDBERGER: And attorney-client  
 12 privilege. And to the extent that there's  
 13 an agreement that exists that's  
 14 confidential, we will not waive the  
 15 confidentiality agreement.  
 16 MR. PAGLIUCA: And we can have -- you  
 17 can have a standing objection to that on  
 18 those grounds related to any question I ask  
 19 about the settlement agreement with  
 20 Ms. Giuffre, if that makes it easier.  
 21 MR. GOLDBERGER: Yeah. That makes it  
 22 easier. Thank you.  
 23 BY MR. PAGLIUCA:  
 24 Q. I've not seen the settlement agreement.  
 25 But let me ask you if you can tell me what the terms

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1 J. Epstein - Confidential  
 2 of that agreement are, Mr. Epstein.  
 3 MR. CASSELL: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. PAGLIUCA:  
 7 Q. Does the settlement agreement contain a  
 8 release of any claims that Ms. Giuffre had or would  
 9 have against you?  
 10 MR. CASSELL: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. PAGLIUCA:  
 14 Q. Did the settlement agreement provide for a  
 15 release by you of any claims against Giuffre?  
 16 MR. CASSELL: Form and foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. PAGLIUCA:  
 19 Q. It's true, is it not, Mr. Epstein, you have  
 20 no economic interest in this litigation?  
 21 MR. CASSELL: Form and foundation.  
 22 Calls for a legal conclusion.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. And by "this litigation," I mean the

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 2 litigation we are here on today, the Plaintiff being  
 3 Ms. Giuffre, the Defendant being Ms. Maxwell.  
 4 So, to be clear, you are not named as a  
 5 Defendant in that litigation, correct?  
 6 MR. CASSELL: Form and foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. PAGLIUCA:  
 9 Q. The outcome of this litigation, the Giuffre  
 10 versus Maxwell litigation, will have no impact on you  
 11 financially, correct?  
 12 MR. CASSELL: Form and foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. And the outcome of -- of this litigation  
 16 will not affect you in any way, correct?  
 17 MR. CASSELL: Form and foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. PAGLIUCA:  
 20 Q. In 2007 you entered into what's been  
 21 referred to here today as a non-prosecution agreement  
 22 with the United States Government; is that correct?  
 23 A. Fifth.  
 24 Q. And as part of that non-prosecution  
 25 agreement, the United States of America agreed to not

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 2 institute criminal charges against alleged potential  
 3 co-conspirators in that matter, including  
 4 Sarah Kellen, Adriana Ross, Leslie Goth (phonetic),  
 5 or Nadia Marcinkova; is that correct?  
 6 MR. CASSELL: Form and foundation.  
 7 Calls for a legal conclusion.  
 8 MR. WEINBERG: To the extent your  
 9 knowledge is based on communications with  
 10 attorneys, attorney-client privilege.  
 11 THE WITNESS: Fifth.  
 12 BY MR. PAGLIUCA:  
 13 Q. You were provided, Mr. Epstein, with a copy  
 14 of the non-prosecution agreement that you entered  
 15 into with the United States Government in 2007,  
 16 correct?  
 17 A. Fifth.  
 18 MR. WEINBERG: Attorney-client  
 19 privilege.  
 20 BY MR. PAGLIUCA:  
 21 Q. And you've read a non-prosecution agreement  
 22 that you entered into with the United States  
 23 Government in 2007 before you signed it, correct?  
 24 A. Fifth.  
 25 Q. Ms. Maxwell was not identified by name in

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 2 the non-prosecution agreement, correct?  
 3 A. Fifth.  
 4 Q. And Ms. Maxwell was not identified in the  
 5 non-prosecution agreement because she was not a  
 6 conspirator in any crime, correct?  
 7 MR. CASSELL: Form and foundation.  
 8 Calls for a legal conclusion.  
 9 THE WITNESS: Fifth.  
 10 BY MR. PAGLIUCA:  
 11 Q. You are aware, from sources other than your  
 12 lawyers, that Mr. Edwards, who is one of the  
 13 Plaintiff's lawyers in this case, and Mr. Cassell,  
 14 who has taken your deposition here today, are  
 15 attempting to have your non-prosecution agreement  
 16 with the United States Government voided, correct?  
 17 A. Fifth.  
 18 MR. CASSELL: Object to form and  
 19 foundation.  
 20 MR. GOLDBERGER: And attorney-client  
 21 privilege.  
 22 BY MR. PAGLIUCA:  
 23 Q. Absent the attempts by Mr. Cassell and  
 24 Edwards on behalf of their clients to void your  
 25 non-prosecution agreement, you would be available as

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 2 a witness to testify in this case, correct?  
 3 A. Fifth.  
 4 MR. CASSELL: Object to form and  
 5 foundation. Calls for a legal conclusion.  
 6 MR. WEINBERG: The answer would be  
 7 based on the attorney-client privilege  
 8 communication.  
 9 MR. GOLDBERGER: I think he said, the  
 10 Fifth.  
 11 THE COURT REPORTER: Okay.  
 12 THE WITNESS: Fifth.  
 13 BY MR. PAGLIUCA:  
 14 Q. And setting aside any communications that  
 15 you may have had with any lawyers representing you,  
 16 absent the efforts by Mr. Cassell and Edwards to have  
 17 your non-prosecution agreement voided, you would be  
 18 able to testify as a witness in this matter, correct?  
 19 MR. CASSELL: Form and foundation.  
 20 Calls for a legal conclusion.  
 21 THE WITNESS: Fifth.  
 22 BY MR. PAGLIUCA:  
 23 Q. Absent the efforts by Mr. Cassell and  
 24 Mr. Edwards to void your non-prosecution agreement,  
 25 you would be willing to testify as a witness in this

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 2 case, correct?  
 3 MR. CASSELL: Form and foundation.  
 4 Speculation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. PAGLIUCA:  
 7 Q. And absent the efforts by Mr. Cassell and  
 8 Mr. Edwards to void your non-prosecution agreement,  
 9 your willing, truthful testimony in this case would  
 10 be helpful to Ms. Maxwell, correct?  
 11 MR. CASSELL: Form. Foundation. Calls  
 12 for a legal conclusion. Speculation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. You were asked some questions by  
 16 Mr. Cassell about the lawsuit by Ms. Roberts against  
 17 you.  
 18 It's true, is it not, that the allegations  
 19 contained in that complaint against you by Ms. --  
 20 then Roberts or Giuffre were false, correct?  
 21 MR. CASSELL: Form. Foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. PAGLIUCA:  
 24 Q. And any allegations in that complaint by  
 25 Ms. Giuffre/Roberts against you relating to

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 2 Ms. Maxwell were false, correct?  
 3 MR. CASSELL: Form. Foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. PAGLIUCA:  
 6 Q. Can you tell me, Mr. Epstein, given that  
 7 the allegations against you in the complaint by  
 8 Ms. Roberts/Giuffre were false, why did you settle  
 9 the lawsuit?  
 10 MR. CASSELL: Form. Foundation.  
 11 MR. GOLDBERGER: And attorney-client  
 12 privilege.  
 13 MR. WEINBERG: Attorney-client  
 14 privilege. Sorry, Jack.  
 15 MR. GOLDBERGER: That's okay, Marty.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. And without regard -- so I'm not asking you  
 19 for any communication between you and any lawyer.  
 20 Given the fact that the allegations given  
 21 by Miss Giuffre/Roberts against you were false,  
 22 without discussing any information communicated to  
 23 you by any lawyer, what were your personal reasons  
 24 for settling the lawsuit?  
 25 MR. CASSELL: Form. Foundation.

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 2 THE WITNESS: Fifth.  
 3 MR. WEINBERG: And his -- and his state  
 4 of mind is inseparable from attorney-client  
 5 communications.  
 6 MR. PAGLIUCA: Right. I'm not asking  
 7 for any attorney-client communications, so  
 8 we are clear.  
 9 BY MR. PAGLIUCA:  
 10 Q. I don't recall if I asked you or not, but I  
 11 will ask you now: What were the terms of the  
 12 settlement agreement between yourself and  
 13 Ms. Giuffre/Roberts?  
 14 A. Fifth.  
 15 MR. GOLDBERGER: And the standing  
 16 objection on confidentiality.  
 17 MR. PAGLIUCA: Understood.  
 18 BY MR. PAGLIUCA:  
 19 Q. Mr. Epstein, you read Ms. Roberts' --  
 20 Ms. Virginia Roberts/Giuffre's statements published  
 21 in the media about Ghislaine Maxwell, correct?  
 22 MR. CASSELL: Form. Foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. When you read those statements, you

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 2 understood that the statements made about Ms. Maxwell  
 3 were false, correct?  
 4 MR. CASSELL: Form. Foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. PAGLIUCA:  
 7 Q. You understood that those statements were  
 8 false because Ms. Maxwell did not recruit  
 9 Virginia Roberts to have sex with you, correct?  
 10 MR. CASSELL: Form. Foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. PAGLIUCA:  
 13 Q. You understood that the statements were  
 14 false because Ms. Maxwell did not assist anyone,  
 15 including yourself, in sexually trafficking  
 16 Virginia Roberts to any person, correct?  
 17 MR. CASSELL: Object to form and  
 18 foundation. And just so the record is  
 19 clear, if I just use the words "form,  
 20 foundation" --  
 21 MR. PAGLIUCA: That is fine with me.  
 22 MR. CASSELL: Form. Foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. You understand that Virginia Roberts was

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 2 not 15 when she claims to have met you, true?  
 3 MR. CASSELL: Form. Foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. PAGLIUCA:  
 6 Q. You understand that Virginia Roberts was  
 7 not 16 at the time that she claims to have met you,  
 8 correct?  
 9 MR. CASSELL: Form, foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. PAGLIUCA:  
 12 Q. You understand -- well, isn't it true that  
 13 Ms. Roberts represented to you, at the time that she  
 14 met you, that she was 18 years old?  
 15 MR. CASSELL: Form. Foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. Isn't it true that Ms. Roberts represented  
 19 to others in your presence that she was over the age  
 20 of 18?  
 21 MR. CASSELL: Form. Foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. PAGLIUCA:  
 24 Q. Isn't it true that Ms. Roberts represented  
 25 to Ms. Maxwell that she was over the age of 18?

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 2 MR. CASSELL: Form. Foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. PAGLIUCA:  
 5 Q. Mr. Cassell asked you some questions about  
 6 a purported hospital visit involving you and  
 7 Ms. Roberts/Giuffre in New York.  
 8 Do you recall that, if you know, that  
 9 Ms. Roberts represented to the hospital folks that  
 10 she was over the age of 18?  
 11 MR. CASSELL: Form. Foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. PAGLIUCA:  
 14 Q. Now, when you met Ms. Giuffre/Roberts, in  
 15 addition to telling you that she was over the age of  
 16 18, she represented to you that she worked as a  
 17 masseuse at Mar-a-Lago, correct?  
 18 MR. CASSELL: Form. Foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. PAGLIUCA:  
 21 Q. And you would have met her sometime in the  
 22 late fall because Mar-a-Lago is closed, at least the  
 23 spa part of Mar-a-Lago is closed, during the summer,  
 24 correct?  
 25 MR. CASSELL: Form. Foundation.

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 2 THE WITNESS: Fifth.  
 3 BY MR. PAGLIUCA:  
 4 Q. And in 2000, 2001, the spa would have been  
 5 closed during the summer, correct?  
 6 MR. CASSELL: Form. Foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. PAGLIUCA:  
 9 Q. It was your decision to hire Ms. Giuffre as  
 10 a masseuse, understanding that she was over the age  
 11 of 18, correct?  
 12 MR. CASSELL: Form, foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. And she was not recruited by you or anyone  
 16 else to have sex with you, correct?  
 17 MR. CASSELL: Form. Foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. PAGLIUCA:  
 20 Q. Now, at the time that Ms. Giuffre met you  
 21 and represented that she was a masseuse and over the  
 22 age of 18, she was driving her own car, correct?  
 23 MR. CASSELL: Form, foundation.  
 24 THE WITNESS: Fifth.  
 25

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 2 BY MR. PAGLIUCA:  
 3 Q. At the time that Ms. Giuffre/Roberts met  
 4 you and told you that she was over the age of 18 and  
 5 a masseuse, she was living with someone that she  
 6 identified as her fiance, correct?  
 7 MR. CASSELL: Form. Foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. PAGLIUCA:  
 10 Q. At the time that Ms. Giuffre met you --  
 11 represented to you that she was a masseuse over the  
 12 age of 18, driving her own car, and living with her  
 13 fiance in an apartment, she had the ability to come  
 14 and go from your residence as she pleased, correct?  
 15 MR. CASSELL: Form. Foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. You never forced Ms. Roberts ever to stay  
 19 over your house at night, correct?  
 20 MR. CASSELL: Form. Foundation.  
 21 Vague.  
 22 THE WITNESS: Fifth.  
 23 BY MR. PAGLIUCA:  
 24 Q. Ms. Roberts was never forced to do anything  
 25 by you, correct?

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1 J. Epstein - Confidential  
 2 MR. CASSELL: Form. Foundation.  
 3 Vague.  
 4 THE WITNESS: Fifth.  
 5 BY MR. PAGLIUCA:  
 6 Q. Ms. Roberts was not a "sex slave," correct?  
 7 MR. CASSELL: Form. Foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. PAGLIUCA:  
 10 Q. And you never sexually trafficked  
 11 Ms. Roberts to anyone, correct?  
 12 MR. CASSELL: Form. Foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. At the time Ms. Roberts made statements to  
 16 the media about you and Ms. Maxwell, you told  
 17 Ms. Maxwell on January 25th, 2015, that "You have  
 18 done nothing wrong, and I would urge you to start  
 19 acting like it. Go outside, head high, not as an  
 20 escaping convict. Go to parties. Deal with it."  
 21 Do you remem- -- recall making that written  
 22 statement to Ms. Maxwell in an e-mail produced in  
 23 this case, GM01098, on January 25th, 2015?  
 24 MR. CASSELL: Form. Foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 BY MR. PAGLIUCA:  
 3 Q. And at the time that you made that e-mail  
 4 statement to Ms. Maxwell, you made it because it was  
 5 true, correct?  
 6 MR. CASSELL: Form. Foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. PAGLIUCA:  
 9 Q. When you said to Ms. Maxwell in your  
 10 written communication on January 25th, 2015, "You  
 11 have done nothing wrong," you were referring to  
 12 Ms. Giuffre/Roberts' false claims that somehow  
 13 Ms. Maxwell had participated in sexual misconduct  
 14 with Ms. Giuffre/Roberts, correct?  
 15 MR. CASSELL: Form. Foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. When you said to Ms. Maxwell, "You have  
 19 done nothing wrong," you were telling her that you  
 20 knew that she had not been involved in any illegal  
 21 activity associated with you, correct?  
 22 MR. CASSELL: Form. Foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. You urged Ms. Maxwell to start acting like

1 J. Epstein - Confidential  
 2 BY MR. PAGLIUCA:  
 3 Q. You responded, "Okay, with me," because, in  
 4 fact, [REDACTED] was your girlfriend from at least the  
 5 end of 1999 through 2002, correct?  
 6 MR. CASSELL: Form. Foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. PAGLIUCA:  
 9 Q. It is true that neither you nor Ms. Maxwell  
 10 trained Virginia Roberts to have sex with anyone,  
 11 correct?  
 12 MR. CASSELL: Form. Foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. And it is true that you never pimped  
 16 Virginia Roberts/Giuffre out to any other person,  
 17 correct?  
 18 MR. CASSELL: Form. Foundation.  
 19 Vague.  
 20 THE WITNESS: Fifth.  
 21 BY MR. PAGLIUCA:  
 22 Q. To your knowledge, Virginia Roberts/Giuffre  
 23 did not have sex with Alan Dershowitz?  
 24 MR. CASSELL: Form. Foundation.  
 25 BY MR. PAGLIUCA:

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 2 she had done nothing wrong, because you knew that she  
 3 had, in fact, done nothing wrong, correct?  
 4 MR. CASSELL: Form. Foundation. Calls  
 5 for speculation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. PAGLIUCA:  
 8 Q. When you told Ms. Maxwell, "Go outside,  
 9 head high, not as an escaping convict," you were  
 10 encouraging her to act like she had done nothing  
 11 wrong because, in fact, she had done nothing wrong,  
 12 correct?  
 13 MR. CASSELL: Form. Foundation.  
 14 Vague.  
 15 THE WITNESS: Fifth.  
 16 BY MR. PAGLIUCA:  
 17 Q. You were responding to an e-mail sent to  
 18 you by Ms. Maxwell on January 24th, 2015, in which  
 19 she indicated, "I would appreciate it if [REDACTED] would  
 20 come out and say that she was your girlfriend. I  
 21 think she was from end '99 to 2002."  
 22 Do you recall receiving that communication  
 23 from Ms. Maxwell and responding to it?  
 24 MR. CASSELL: Form. Foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 Q. Correct?  
 3 A. Fifth.  
 4 Q. Any other world leaders, correct?  
 5 MR. CASSELL: Form. Foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. PAGLIUCA:  
 8 Q. Any other political figures in the  
 9 United States?  
 10 MR. CASSELL: Form. Foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. PAGLIUCA:  
 13 Q. Any other entertainers?  
 14 A. Fifth.  
 15 MR. CASSELL: Form. Foundation.  
 16 THE WITNESS: Sorry.  
 17 BY MR. PAGLIUCA:  
 18 Q. In particular, David Copperfield?  
 19 MR. CASSELL: Form. Foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. PAGLIUCA:  
 22 Q. You understood that Ms. Roberts/Giuffre  
 23 left the United States in, roughly, 2002 to go to  
 24 Thailand, correct?  
 25 A. Fifth.

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1 J. Epstein - Confidential  
 2 Q. And the last time that you spoke or saw her  
 3 was prior to her leaving for Thailand, correct?  
 4 MR. CASSELL: Form. Foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. PAGLIUCA:  
 7 Q. You understood that Ms. Roberts/Giuffre  
 8 went to Thailand because she had a warrant out for  
 9 her arrest for theft from the Roadhouse Grill,  
 10 correct?  
 11 MR. CASSELL: Form. Foundation. Calls  
 12 for a legal conclusion.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. You were asked some questions by  
 16 Mr. Cassell regarding the -- I can't recall what he  
 17 referred to it as. I think it was the Palm Beach  
 18 investigation.  
 19 Are you aware that in approximately March  
 20 of 2005 -- I'm just going to wait for that noise to  
 21 die down here, whatever that is.  
 22 You're aware that in approximately March  
 23 of 2005, the Palm Beach Police Department began an  
 24 investigation concerning you based on a report from a  
 25 woman named Erica Gonzalez?

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1 J. Epstein - Confidential  
 2 MR. CASSELL: Form. Foundation.  
 3 MR. GOLDBERGER: And attorney-client  
 4 privilege.  
 5 THE WITNESS: Fifth.  
 6 BY MR. PAGLIUCA:  
 7 Q. I'm not asking you for any information  
 8 based on attorney-client privilege, Mr. Epstein, for  
 9 any of these questions.  
 10 I'm assuming that you were provided and  
 11 read police reports related to the Palm Beach  
 12 investigation. Based on your reading of those  
 13 reports and not based on any conversations with any  
 14 lawyers that you may have had at the time, you are  
 15 aware that in approximately March of 2005, the Palm  
 16 Beach Police Department began an investigation  
 17 concerning you based on a report from a woman named  
 18 Erica Gonzalez?  
 19 A. Fifth.  
 20 Q. You were provided with a copy of the police  
 21 reports related to that investigation, correct?  
 22 A. Fifth.  
 23 MR. GOLDBERGER: And attorney-client  
 24 privilege.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. PAGLIUCA:  
 3 Q. The police reports generally indicated that  
 4 allegations that you had sexual contact with females  
 5 under the age of 18 in the Palm Beach area, correct?  
 6 A. Fifth.  
 7 Q. Virginia Roberts/Giuffre was not one of the  
 8 alleged victims discussed or contacted in connection  
 9 with that investigation, correct?  
 10 MR. CASSELL: Form. Foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. PAGLIUCA:  
 13 Q. And to your knowledge,  
 14 Virginia Roberts/Giuffre was never contacted by the  
 15 Palm Beach Police Department?  
 16 MR. CASSELL: Form. Foundation.  
 17 Vague.  
 18 THE WITNESS: Fifth.  
 19 BY MR. PAGLIUCA:  
 20 Q. None of the alleged victims in the Palm  
 21 Beach investigation identified Ghislaine Maxwell as a  
 22 part of any alleged sexual contact scheme, correct?  
 23 MR. CASSELL: Form. Foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. PAGLIUCA:  
 3 Q. You're aware that no one connected with  
 4 that investigation accused Ms. Maxwell of any  
 5 wrongdoing?  
 6 MR. CASSELL: Form. Foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. PAGLIUCA:  
 9 Q. None of the alleged victims in the Palm  
 10 Beach investigation claimed that they traveled with  
 11 you in any airplane, correct?  
 12 A. Fifth.  
 13 Q. None of the alleged victims in the Palm  
 14 Beach investigation claimed that they traveled with  
 15 you outside of the State of Florida, correct?  
 16 MR. CASSELL: Form. Foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. PAGLIUCA:  
 19 Q. None of the alleged victims in the Palm  
 20 Beach investigation claimed that you have been  
 21 introduced to them by Ghislaine Maxwell, correct?  
 22 MR. CASSELL: Form. Foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. In fact, the majority of the alleged

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1 J. Epstein - Confidential  
 2 victims in the Palm Beach investigation claimed to  
 3 have been recruited by someone named Haley Robson,  
 4 correct?  
 5 MR. CASSELL: Form. Foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. PAGLIUCA:  
 8 Q. You're aware, Mr. Epstein, that these  
 9 police reports are available as a public record by  
 10 request to the Palm Beach Police Department?  
 11 A. Fifth.  
 12 Q. And you're aware, Mr. Epstein, that  
 13 unredacted versions of these police reports can be  
 14 obtained from the State's Attorney's Office hereby a  
 15 letter request, correct?  
 16 MR. CASSELL: Form -- form.  
 17 Foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. PAGLIUCA:  
 20 Q. Mr. Cassell asked you some questions  
 21 earlier about some police reports related to  
 22 Ms. Roberts/Giuffre related to her claims that she  
 23 had been sexually assaulted here in Florida by men  
 24 other than you. Do you recall those questions?  
 25 A. Yes.

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1 J. Epstein - Confidential  
 2 Q. Okay. Are you aware that those police  
 3 reports are also available by simply requesting them  
 4 from the Palm Beach Police Department?  
 5 MR. CASSELL: Form. Foundation. Calls  
 6 for a legal conclusion.  
 7 THE WITNESS: Fifth.  
 8 MR. CASSELL: Can we hold on one  
 9 second?  
 10 MR. PAGLIUCA: Sure. Having a problem  
 11 there?  
 12 MR. CASSELL: Take 30 seconds to see if  
 13 we can get these going.  
 14 All right. You're on, Jeff.  
 15 MR. PAGLIUCA: Okay.  
 16 BY MR. PAGLIUCA:  
 17 Q. With regard to the Palm Beach Police  
 18 Department investigation, you're aware that none of  
 19 the alleged victims in that matter claimed to have  
 20 lived with you?  
 21 MR. CASSELL: Form. Foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. PAGLIUCA:  
 24 Q. You're aware that none of the alleged  
 25 victims in that matter claimed to have stayed with

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1 J. Epstein - Confidential  
 2 you overnight in any residence?  
 3 MR. CASSELL: Form. Foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. PAGLIUCA:  
 6 Q. You're aware that none of those alleged  
 7 victims claimed to have ever met or talked to  
 8 Ms. Maxwell?  
 9 MR. CASSELL: Form. Foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. PAGLIUCA:  
 12 Q. And you're aware that none of those alleged  
 13 victims ever claimed to have been paid by  
 14 Ms. Maxwell?  
 15 MR. CASSELL: Form. Foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. It is true, Mr. Epstein, that you, at least  
 19 during timeframe that we are talking about here, so I  
 20 will say from, let's say, 1999 through 2005, enjoyed  
 21 getting a massage; is that correct?  
 22 A. Fifth.  
 23 Q. And you had many masseuses that you hired  
 24 to come to your house to give you a massage, correct?  
 25 MR. CASSELL: Object to form.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. PAGLIUCA:  
 4 Q. Many of those masseuses were contacted as  
 5 part of the Palm Beach Police Department  
 6 investigation; do you recall that?  
 7 A. Fifth.  
 8 Q. And many of those masseuses that were  
 9 contacted indicated that all of their massages were  
 10 professional and paid for by you; do you recall that?  
 11 MR. CASSELL: Form. Foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. PAGLIUCA:  
 14 Q. Now, you -- after Ms. Roberts left the  
 15 country as a result of the warrant out for her arrest  
 16 for theft, you later learned that she was bringing  
 17 civil claims against you, purporting that you had  
 18 sexually assaulted her, correct?  
 19 MR. CASSELL: Form. Foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. PAGLIUCA:  
 22 Q. And those claims were raised up by her  
 23 after a lot of publicity had occurred related to the  
 24 Palm Beach investigation about you with the  
 25 allegations of sexual misconduct, correct?

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1 J. Epstein - Confidential  
 2 MR. CASSELL: Form. Foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. PAGLIUCA:  
 5 Q. There were widespread media reports  
 6 detailing the allegations about you in the press here  
 7 in the South Florida area at the time, correct?  
 8 MR. CASSELL: Form. Foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. PAGLIUCA:  
 11 Q. Would you agree with me, Mr. Epstein, that  
 12 the police -- the leaking of the police reports and  
 13 the leaking of the information to the press, the  
 14 reporting of the allegations by the press made you an  
 15 easy target for anyone who wanted to make a claim of  
 16 sexual misconduct against you?  
 17 MR. CASSELL: Form. Foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. PAGLIUCA:  
 20 Q. And, indeed, there were many people who  
 21 began falsely claiming that you had engaged in some  
 22 form of sexual misconduct with them?  
 23 MR. CASSELL: Form. Foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. PAGLIUCA:  
 3 Q. You were also an easy target for  
 4 unscrupulous lawyers to make those claims and promote  
 5 those claims against you, correct?  
 6 MR. CASSELL: Form. Foundation.  
 7 Vague.  
 8 THE WITNESS: Fifth.  
 9 BY MR. PAGLIUCA:  
 10 Q. For example, there was a lawyer, now  
 11 disbarred and in prison, named Mr. Rothstein, who was  
 12 promoting lawsuits against you as part of a Ponzi  
 13 scheme here, correct?  
 14 MR. CASSELL: Form. Foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. PAGLIUCA:  
 17 Q. And Mr. Rothstein was trying to convince  
 18 people to buy shares in litigation against you and  
 19 the outcome of litigation against you, correct?  
 20 MR. CASSELL: Form. Foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. PAGLIUCA:  
 23 Q. Mr. Rothstein worked with an individual  
 24 named Bradley Edwards prior to Mr. Rothstein being  
 25 prosecuted and imprisoned, correct?

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1 J. Epstein - Confidential  
 2 MR. CASSELL: Form. Foundation. Lack  
 3 of personal knowledge.  
 4 THE WITNESS: Fifth.  
 5 BY MR. PAGLIUCA:  
 6 Q. And you knew personally that Mr. Rothstein  
 7 worked with Mr. Edwards because you sued both  
 8 Mr. Rothstein and Mr. Edwards in case captioned  
 9 Jeffrey Epstein, Plaintiff, versus Scott Rothstein,  
 10 individually, Bradley J. Edwards, individually, and  
 11 L.M., individually in 2009, correct?  
 12 MR. CASSELL: Form. Foundation. Lack  
 13 of personal knowledge.  
 14 THE WITNESS: Fifth.  
 15 BY MR. PAGLIUCA:  
 16 Q. That would be in 2008. So let me amend  
 17 that. The question would be in 2008.  
 18 MR. CASSELL: Form. Foundation. Lack  
 19 of personal knowledge.  
 20 BY MR. PAGLIUCA:  
 21 Q. Your lawyer at the time was somebody named  
 22 Robert D. Critton, correct?  
 23 MR. CASSELL: Form. foundation. Lack  
 24 of proper pronunciation. It's Critton, I  
 25 think.

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1 J. Epstein - Confidential  
 2 BY MR. PAGLIUCA:  
 3 Q. Critton. Okay. C-R-I-T-T-O-N.  
 4 A. Fifth.  
 5 Q. You say, Critton. I say, Critton. I don't  
 6 know how to --  
 7 MR. CASSELL: Jack might know.  
 8 MR. GOLDBERGER: I hate to weigh in on  
 9 it, but Mr. Cassell's -- Professor Cassell  
 10 is correct.  
 11 BY MR. PAGLIUCA:  
 12 Q. In that lawsuit you claimed that  
 13 Mr. Rothstein and Mr. Edwards manufactured claims  
 14 against you, correct?  
 15 MR. CASSELL: Form. Foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. In that lawsuit, you alleged that  
 19 Mr. Rothstein and Mr. Edwards were guilty of criminal  
 20 conduct, including running a Ponzi scheme, securities  
 21 fraud, perjury, and other crimes, correct?  
 22 MR. CASSELL: Form. Foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. You indicated -- well, isn't it true that



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1 J. Epstein - Confidential  
 2 Mr. Rothstein and Mr. Edwards were able to have women  
 3 change their stories about you and make false  
 4 allegations against you for money?  
 5 MR. CASSELL: Form. Foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. PAGLIUCA:  
 8 Q. In this case, you are aware that  
 9 Mr. Edwards represents Ms. Giuffre/Roberts?  
 10 A. Fifth.  
 11 Q. And you are aware that Mr. Edwards and a  
 12 lawyer named Jack Scarola contacted Ms. Giuffre prior  
 13 to the filing of any -- of this lawsuit to discuss  
 14 with her allegations against you and Ms. Maxwell,  
 15 correct?  
 16 A. Fifth.  
 17 Q. Is it -- it is true that Mr. Edwards  
 18 provided Ms. Giuffre/Roberts with substantial  
 19 information from both the Palm Beach investigation  
 20 about you and other information that they had  
 21 obtained so that they could promote their allegations  
 22 against you in this litigation, correct?  
 23 MR. CASSELL: Form. Foundation. Calls  
 24 for speculation. Lack of personal  
 25 knowledge.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. PAGLIUCA:  
 4 Q. It is true, Mr. Epstein, that you did not  
 5 sexually traffic Ms. Roberts/Giuffre, correct?  
 6 MR. CASSELL: Form. Foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. PAGLIUCA:  
 9 Q. And it's true, Mr. Epstein, that  
 10 Ms. Maxwell did nothing to assist you in sexually  
 11 trafficking Ms. Giuffre/Roberts, correct?  
 12 MR. CASSELL: Form. Foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. The reason you are asserting a Fifth  
 16 Amendment privilege here today has nothing do with  
 17 Ghislaine Maxwell, correct?  
 18 MR. CASSELL: Form. Foundation. Calls  
 19 for speculation.  
 20 THE WITNESS: Fifth.  
 21 MR. GOLDBERGER: And attorney-client  
 22 privilege.  
 23 BY MR. PAGLIUCA:  
 24 Q. The reason you are asserting the Fifth  
 25 Amendment privilege here today is to protect yourself

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1 J. Epstein - Confidential  
 2 from possible prosecution from others, correct?  
 3 MR. CASSELL: Form. Foundation.  
 4 THE WITNESS: Fifth.  
 5 MR. GOLDBERGER: And attorney-client.  
 6 MR. WEINBERG: Attorney-client  
 7 privilege.  
 8 MR. GOLDBERGER: Yeah. We got it.  
 9 Thanks.  
 10 MR. WEINBERG: Sorry, Jack.  
 11 MR. GOLDBERGER: That's all right.  
 12 BY MR. PAGLIUCA:  
 13 Q. It is true, Mr. Epstein, you have no  
 14 loyalty to Ms. Maxwell, as you sit here today,  
 15 correct?  
 16 MR. CASSELL: Form. Foundation.  
 17 THE WITNESS: Fifth.  
 18 MR. PAGLIUCA: I think I am done. So  
 19 if you'll give me a minute, I'll go over my  
 20 notes. We can take a five-minute break.  
 21 VIDEO TECHNICIAN: Off the record at  
 22 1:03.  
 23 (A recess was taken.)  
 24 VIDEO TECHNICIAN: On the record at  
 25 1:18.

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1 J. Epstein - Confidential  
 2 BY MR. PAGLIUCA:  
 3 Q. I just have a few more questions,  
 4 Mr. Epstein.  
 5 This [REDACTED] person that you've identified  
 6 as being your girlfriend, this was, roughly, from the  
 7 end of 1999 that [REDACTED] was your girlfriend, correct?  
 8 A. Fifth.  
 9 Q. What's [REDACTED] last name?  
 10 A. Fifth.  
 11 Q. And is it true that you had not --  
 12 MR. CASSELL: I'm sorry. Can we go --  
 13 the question before the "last name," I  
 14 should have objected to form and foundation  
 15 on that one.  
 16 MR. PAGLIUCA: What was [REDACTED] last  
 17 name?  
 18 MR. CASSELL: The one that [REDACTED] was,  
 19 in fact, your girlfriend. I'm sorry. I  
 20 apologize. I should have -- form and  
 21 foundation on that one.  
 22 MR. PAGLIUCA: I'll give it to you.  
 23 MR. CASSELL: Thanks.  
 24 MR. PAGLIUCA: In face, here, I'll ask  
 25 it again so you can object.

1 J. Epstein - Confidential  
 2 MR. CASSELL: Thank you.  
 3 BY MR. PAGLIUCA:  
 4 Q. It is true that [REDACTED] was your girlfriend  
 5 from approximately the end of 1999, correct?  
 6 MR. CASSELL: Form and foundation.  
 7 Thank you.  
 8 THE WITNESS: Fifth.  
 9 BY MR. PAGLIUCA:  
 10 Q. Ms. Maxwell had not been your girlfriend  
 11 for some time prior to 1999, correct?  
 12 MR. CASSELL: Form. Foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. PAGLIUCA:  
 15 Q. In fact, beginning prior to 1999, you spent  
 16 less and less time with Ms. Maxwell, correct?  
 17 MR. CASSELL: Form. Foundation. And  
 18 -- and chronology.  
 19 Are you saying -- are you going  
 20 backwards in time?  
 21 MR. PAGLIUCA: Yes, I am.  
 22 MR. CASSELL: Okay. Vague.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. After 1999, when [REDACTED] was your

1 J. Epstein - Confidential  
 2 correct?  
 3 MR. CASSELL: Form. Foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. PAGLIUCA:  
 6 Q. And after 1999, moving forward, Ms. Maxwell  
 7 spent less and less time, so increasingly less time  
 8 visiting your house in Palm Beach, correct?  
 9 MR. CASSELL: Form. Foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. PAGLIUCA:  
 12 Q. You were the person responsible for hiring  
 13 or firing any of your domestic employees from 1998  
 14 moving forward in time, correct?  
 15 MR. CASSELL: Form. Foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. PAGLIUCA:  
 18 Q. From 1998 moving forward in time, you made  
 19 all of the decisions with regard to the hiring and  
 20 firing of any employee, correct?  
 21 MR. CASSELL: Form. Foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. PAGLIUCA:  
 24 Q. From 1998 moving forward, you made all the  
 25 decisions with regard to the job functions of any of

1 J. Epstein - Confidential  
 2 girlfriend, Ms. Maxwell spent less and less time in  
 3 your presence, correct?  
 4 MR. CASSELL: Form. Foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. PAGLIUCA:  
 7 Q. After 1999, when [REDACTED] was your  
 8 girlfriend, Ms. Maxwell spent less time at any of  
 9 your residences, correct?  
 10 MR. CASSELL: Form. Foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. PAGLIUCA:  
 13 Q. After 1999, Ms. Maxwell increasingly  
 14 decreased her visits to the -- your Palm Beach  
 15 residence, correct?  
 16 MR. CASSELL: Form. Foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. PAGLIUCA:  
 19 Q. After 1999, Ms. Maxwell decreased the  
 20 frequency of her travels with you, correct?  
 21 MR. CASSELL: Form. Foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. PAGLIUCA:  
 24 Q. And over time, from 1999 moving forward,  
 25 Miss Maxwell spent less and less time with you,

1 J. Epstein - Confidential  
 2 your domestic employees, correct?  
 3 MR. CASSELL: Form. Foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. PAGLIUCA:  
 6 Q. Is it true that you had a falling out with  
 7 Virginia Roberts/Giuffre because she was increasingly  
 8 using drugs and abusing drugs from 19 -- 2000 through  
 9 2002?  
 10 MR. CASSELL: Form. Foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. PAGLIUCA:  
 13 Q. And you had a falling out with Ms. Giuffre  
 14 as a result of what you observed to be erratic  
 15 behavior, including criminal activity?  
 16 MR. CASSELL: Form. Foundation. Lack  
 17 of personal knowledge.  
 18 THE WITNESS: Fifth.  
 19 BY MR. PAGLIUCA:  
 20 Q. Do you ever recall meeting anyone named  
 21 Renaldo Rizzo?  
 22 MR. CASSELL: Form. Foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. PAGLIUCA:  
 25 Q. Ms. Rizzo -- Mr. Rizzo has claimed that he

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2 was at a birthday party at your Palm Beach residence  
3 outside by your pool in which the only other  
4 attendees were children.

5 Is that a true statement or not?

6 MR. CASSELL: Foundation. Misstates  
7 the record.

8 THE WITNESS: Fifth.

9 BY MR. PAGLIUCA:

10 Q. It is, in fact, not true that you had any  
11 birthday party with minor children in attendance at  
12 your pool in Palm Beach, correct?

13 MR. CASSELL: Foundation.

14 THE WITNESS: Fifth.

15 BY MR. PAGLIUCA:

16 Q. Mr. Rizzo has also made some claims that  
17 you had a number of younger-aged females in a  
18 limousine and you went to the Dubin residence in --  
19 outside of New York City. Is Mr. Rizzo's statement  
20 about that false?

21 A. Fifth.

22 Q. And it is true that Mr. Rizzo has made up  
23 that story about you and the Dubins in an attempt to  
24 get money, correct?

25 MR. CASSELL: Form. Foundation.

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2 THE WITNESS: Fifth.

3 BY MR. PAGLIUCA:

4 Q. Mr. Cassell asked you some questions about  
5 some -- someone from Sweden who Mr. Rizzo claimed  
6 that you somehow lured into the United States for  
7 purposes of sexual trafficking.

8 That story by Mr. Rizzo is also false,  
9 correct?

10 MR. CASSELL: Form. Foundation.

11 THE WITNESS: Fifth.

12 BY MR. PAGLIUCA:

13 Q. Do you believe that Eva Dubin, a medical  
14 doctor, would participate in some scheme to sexually  
15 traffic anyone?

16 MR. CASSELL: Form. Foundation. Calls  
17 for speculation. Lack of personal  
18 knowledge.

19 THE WITNESS: Fifth.

20 MR. PAGLIUCA: That's all the questions  
21 I have.

22 MR. CASSELL: I may want to consult  
23 with Ms. McCawley at some point, but maybe  
24 it will make sense for me to try and kind of  
25 see --

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2 MS. MCCAWLEY: That's fine.

3 MR. CASSELL: -- and she'll backstop me  
4 in case I miss a trick along the way, so...

5 REDIRECT EXAMINATION

6 BY MR. CASSELL:

7 Q. We have the advantage by a very skilled  
8 court reporter who's given us a -- essentially a  
9 real-time transcript here.

10 But I noticed that on this real-time  
11 transcript, at page 245, line 12, the question was  
12 asked to you by Mr. Pagliuca, "Any relationship you  
13 had, whether personal or business, ended with  
14 Ms. Maxwell more than 15 years ago, correct?"

15 Do you recall being asked that question?

16 A. Fifth.

17 MR. GOLDBERGER: Well, I think you can  
18 answer that -- you recall being asked this  
19 question just --

20 MR. CASSELL: That's all I'm asking.

21 I'm not trying to trip him up here.

22 BY MR. CASSELL:

23 Q. Let me just restate that again.

24 Do you recall being asked the following  
25 question: "Any relationship you had, whether

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2 personal or business, ended with Ms. Maxwell more  
3 than 15 years ago, correct?"

4 A. What's the question? I'm sorry. Do I  
5 remember the question?

6 Q. Any relationship you had --

7 A. No. Are you asking me do I remember --

8 Q. Do you remember being asked that particular  
9 question?

10 A. Sitting here at the moment, I don't.

11 Q. Okay. I want to represent to you that you  
12 were asked the question: "Any relationship you had,  
13 whether personal or business, ended with Ms. Maxwell  
14 more than 15 years ago, correct?"

15 A. I took the Fifth to that question, if  
16 you're re-asking the question.

17 MR. GOLDBERGER: No. I think he's just  
18 representing that that question was asked.

19 Don't -- and we can establish for purposes  
20 of the record that question was asked.

21 THE WITNESS: Okay.

22 MR. GOLDBERGER: Okay.

23 BY MR. CASSELL:

24 Q. In fact, you had a number of continuing  
25 personal interactions with Ms. Maxwell within the

1 J. Epstein - Confidential  
 2 last 15 years?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. I want to talk to you about some of the  
 8 personal and other relationships you had with  
 9 Ms. Maxwell.  
 10 For example, sir, isn't it true that on  
 11 December 11th, 2000, you, Ms. Maxwell, Ms. Taylor,  
 12 and Virginia Roberts flew from the West Palm Beach  
 13 Airport to the Teterboro, New Jersey Airport?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. And isn't it true that on December 14th,  
 19 2000, you, and Ms. Maxwell and Miss Roberts flew from  
 20 the Teterboro to the U.S. Virgin Islands on your  
 21 private jet?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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 2 I'm sorry, Mr. Pagliuca whether there was any basis  
 3 in fact for some of the questions I was asking you.  
 4 Would it be fair to say that one of the  
 5 bases in fact for asking you questions about  
 6 Virginia's interactions with Prince Andrew would be a  
 7 photograph depicting Ms. Roberts and Prince Andrew?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. You were asked some questions about a  
 13 lawsuit that was styled Edwards versus -- I'm sorry,  
 14 Epstein versus Rothstein, et al. When I ask you a  
 15 question about the piece of that case, that would be  
 16 described as your claim against Brad Edwards.  
 17 Do you understand the setup for the  
 18 question?  
 19 A. Yes.  
 20 Q. You voluntarily dismissed your legal claims  
 21 against Brad Edwards, right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25 MR. GOLDBERGER: And attorney-client

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 2 BY MR. CASSELL:  
 3 Q. Isn't it true, sir, that on January 26th,  
 4 2001, you, Ms. Maxwell, Ms. Taylor, and Ms. Roberts  
 5 flew from Teterboro to West Palm Beach?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Isn't it true that on March 9th, 2001, you,  
 11 Ms. Maxwell, Ms. Taylor, and Virginia flew from  
 12 Tangier, Morocco, to London, England on your private  
 13 jet?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. And that was the trip where you,  
 19 Ms. Maxwell, and Ms. Roberts met Prince Andrew, the  
 20 Duke of York, right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. Previously you were asked by Ms. Pag--

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 2 privilege.  
 3 BY MR. CASSELL:  
 4 Q. To your knowledge, there is no lawsuit  
 5 pending today by you against Mr. Edwards, right?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 MR. GOLDBERGER: And attorney-client.  
 10 BY MR. CASSELL:  
 11 Q. When you traveled to England with Virginia  
 12 and Ms. Maxwell, Ms. Maxwell held Virginia's  
 13 passport, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation. It has been asked and answered  
 16 as well. I didn't go into this, and so I'm  
 17 not sure why we're going over it again.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. You had a relationship with Ms. Maxwell  
 21 when you traveled to -- with her to England, right?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Mr. Pagliuca was suggesting there was no  
 4 basis in fact for some of the questions that I asked.  
 5 One of the bases in fact would have been  
 6 Ms. Maxwell's possession of a passport reflecting  
 7 Virginia's age to be 17 at the time she flew into  
 8 England with you?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Can you ask the question?  
 12 BY MR. CASSELL:  
 13 Q. Isn't that true?  
 14 MR. PAGLIUCA: Same objection.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. You were asked questions about an e-mail in  
 18 which you used the phrase "Hold your head high."  
 19 Do you recall just being asked -- just  
 20 being asked those questions?  
 21 A. Yes.  
 22 Q. I want to talk about the phrase -- now, I  
 23 want to go into the substantive issues.  
 24 With regard to the phrase "Hold your head  
 25 high," the reason you used that phrase is, you didn't

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1 J. Epstein - Confidential  
 2 think there was anything wrong with having sex with  
 3 underage girls, do you?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. In fact, you have used words along the  
 9 lines of having sex with a minor girl is like  
 10 stealing a bagel, true?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. And that, in fact, is your view today about  
 16 the status of having an adult man, decades older than  
 17 an underage girl, having sex with that underage girl,  
 18 right?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. What is your view of men who are decades  
 24 older having sex with 16-year-old girls?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. What is your view of men who are decades  
 6 older having sex with 17-year-old girls?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. You believe that a man can hold his head  
 12 high after having sex with a 16-year-old girl even if  
 13 he's decades older than that girl, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation and foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. You were asked various questions by  
 19 Mr. Pagliuca --  
 20 MR. CASSELL: Am I pronouncing that --  
 21 MR. PAGLIUCA: No.  
 22 MR. CASSELL: I'm sorry.  
 23 MR. PAGLIUCA: The "G" is silent.  
 24 Think lasagna.  
 25 MR. CASSELL: Okay.

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 2 MR. PAGLIUCA: Pal. He's your pal.  
 3 BY MR. CASSELL:  
 4 Q. You were asked some questions by  
 5 Mr. Pagliuca -- got it, okay -- by Mr. Pagliuca about  
 6 whether this litigation would affect you.  
 7 You just recall being asked those  
 8 questions?  
 9 A. Yes.  
 10 Q. With regard to those questions, it's true,  
 11 sir, that this litigation will affect your  
 12 reputation, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Please describe all the ways in which you  
 18 foresee this litigation affecting your reputation.  
 19 MR. PAGLIUCA: Object to the form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. This litigation will affect the reputation  
 24 of associates of yours, won't it?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. This litigation has the potential to  
 6 affect the reputation of Bill Clinton, right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. This litigation has the potential to affect  
 12 the reputation of Prince Andrew, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. This litigation has the potential to affect  
 18 the reputation of Alan Dershowitz, right?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22  
 23 BY MR. CASSELL:  
 24 Q. You could have been a Defendant in this  
 25 action, right?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. In fact, as a pragmatic matter, you are  
 7 essentially a Defendant in this action, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. You realize that many of the allegations in  
 13 this litigation involve your interactions with  
 14 Maxwell, working together against Virginia?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 BY MR. CASSELL:  
 19 Q. You understand that if you turned over all  
 20 the e-mails that we requested of you, that would  
 21 provide a basis for you -- us -- let me rephrase  
 22 that.  
 23 You understand that if you turned over all  
 24 the documents we've requested in the subpoena, that  
 25 that would provide basis for a defamation action by

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 2 Ms. Giuffre against you, right?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. You understand that if you turned over all  
 8 the documents that we have requested in this case,  
 9 that would provide a basis for joining you into this  
 10 case as a co-Defendant of Ms. Maxwell, right?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. What do all the documents that we have  
 16 requested of you show with regard to your involvement  
 17 in Ms. Maxwell's statements against Virginia?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. All the documents that we've requested from  
 23 you would show that you have coordinated closely with  
 24 Ms. Maxwell to attack and defame Virginia, right?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Ms. Maxwell continues to provide emotional  
 6 support for you, right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. Because of the sexual abuse you've  
 12 committed against girls, you lack very many friends  
 13 at this point in time, true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Name anyone who's -- well, strike that.  
 19 Maxwell has been in a business relationship  
 20 with you recently, right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. You and Maxwell need to continue to be in

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2 touch with each other because of interactions that  
3 you've had of a business nature, right?  
4 MR. PAGLIUCA: Object to form and  
5 foundation.  
6 THE WITNESS: Fifth.  
7 BY MR. CASSELL:  
8 Q. Please describe the ways in which you and  
9 Maxwell's affairs are intertwined currently.  
10 MR. PAGLIUCA: Object to form and  
11 foundation.  
12 THE WITNESS: Fifth.  
13 BY MR. CASSELL:  
14 Q. Please describe the way yours and Maxwell's  
15 business affairs are intertwined currently.  
16 MR. PAGLIUCA: Object to form and  
17 foundation.  
18 THE WITNESS: Fifth.  
19 BY MR. CASSELL:  
20 Q. You were asked -- and this is kind of a  
21 setup question again.  
22 You were asked some questions about a  
23 lawsuit filed by Jane Doe 1 and Jane Doe 2 against  
24 the United States seeking to enforce rights under the  
25 Crime Victim Rights Act. Do you recall those general

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2 non-prosecution agreement until it was concluded,  
3 right?  
4 MR. PAGLIUCA: Object to form and  
5 foundation.  
6 THE WITNESS: Fifth.  
7 BY MR. CASSELL:  
8 Q. The non-prosecution agreement binds the  
9 U.S. Attorney's Office for the Southern District of  
10 Florida, correct?  
11 MR. PAGLIUCA: Object to form and  
12 foundation.  
13 BY MR. CASSELL:  
14 Q. I'm sorry. Let me rephrase that.  
15 The non-prosecution agreement binds only  
16 the U.S. Attorney's Office for the Southern District  
17 of Florida, correct?  
18 MR. PAGLIUCA: Object to form and  
19 foundation.  
20 THE WITNESS: Fifth.  
21 MR. GOLDBERGER: And attorney-client  
22 privilege.  
23 BY MR. CASSELL:  
24 Q. Your non-prosecution agreement does not  
25 cover sex offenses in -- you have committed in the

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2 questions?  
3 A. Yes.  
4 Q. I want you to assume for a moment that that  
5 lawsuit is dismissed tomorrow.  
6 If the lawsuit were to be dismissed  
7 tomorrow and I were to ask you all of the same  
8 questions the day after tomorrow, you would give the  
9 same answers, wouldn't you?  
10 MR. PAGLIUCA: Object to form and  
11 foundation.  
12 MR. GOLDBERGER: Why don't you do that  
13 and we'll find out.  
14 THE WITNESS: Fifth.  
15 BY MR. CASSELL:  
16 Q. That case isn't going to be thrown out,  
17 though, because it's meritorious, right?  
18 MR. PAGLIUCA: Object to form and  
19 foundation.  
20 THE WITNESS: Fifth.  
21 MR. GOLDBERGER: And attorney-client  
22 privilege.  
23 BY MR. CASSELL:  
24 Q. In fact, you conspired with the U.S.  
25 Attorney's Office to conceal the existence of your

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2 State of New York, does it?  
3 MR. PAGLIUCA: Object to form and  
4 foundation.  
5 THE WITNESS: Fifth.  
6 MR. GOLDBERGER: Attorney-client.  
7 BY MR. CASSELL:  
8 Q. The non-prosecution agreement does not  
9 cover sex crimes committed in, for example, the U.S.  
10 Virgin Islands or New Mexico, does it?  
11 MR. PAGLIUCA: Object to form and  
12 foundation.  
13 THE WITNESS: Fifth.  
14 MR. GOLDBERGER: Attorney-client.  
15 BY MR. CASSELL:  
16 Q. You would still be unavailable to testify  
17 in the sense that you would have invoked your Fifth  
18 Amendment even without that lawsuit, right?  
19 MR. PAGLIUCA: Object to form and  
20 foundation.  
21 THE WITNESS: Fifth.  
22 MR. GOLDBERGER: Attorney-client.  
23 BY MR. CASSELL:  
24 Q. Which prosecution -- I'm sorry.  
25 Which jurisdictions are you fearful might

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1 J. Epstein - Confidential  
 2 prosecute you for sex offenses?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 MR. GOLDBERGER: Attorney-client.  
 7 BY MR. CASSELL:  
 8 Q. You are fearful of organizations -- I'm  
 9 sorry.  
 10 You are fearful of prosecuting entities  
 11 outside the Southern District of Florida prosecuting  
 12 you for sex offenses, correct?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 MR. GOLDBERGER: Attorney-client.  
 17 BY MR. CASSELL:  
 18 Q. You are fearful of law enforcement  
 19 organizations outside the United States prosecuting  
 20 you for foreign sex offenses, correct?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 MR. GOLDBERGER: Attorney-client.  
 25

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 2 BY MR. CASSELL:  
 3 Q. Part of the basis for you asserting your  
 4 Fifth Amendment privilege today was that you are  
 5 fearful of incriminating yourself in foreign criminal  
 6 prosecutions, correct?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 MR. GOLDBERGER: Attorney-client.  
 11 BY MR. CASSELL:  
 12 Q. In fact, you lack any basis for asserting  
 13 the Fifth Amendment privilege with respect to foreign  
 14 criminal prosecutions, right?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 MR. GOLDBERGER: Attorney-client.  
 19 BY MR. CASSELL:  
 20 Q. Please tell me everything you know about  
 21 your girlfriend [REDACTED].  
 22 A. Fifth.  
 23 Q. In fact, during the period 1999 to 2002,  
 24 Maxwell was your girlfriend, not [REDACTED]?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Between 1999 and 2002, you had threesomes,  
 6 right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. And when you had threesomes, one of the  
 12 participants in the threesome was your girlfriend,  
 13 true?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. The threesomes you had almost invariably  
 19 involved Ghislaine Maxwell, right?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. And when I say they almost invariably  
 25 involved Ghislaine Maxwell, sometimes you were in

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1 J. Epstein - Confidential  
 2 threesomes with other young girls that were not your  
 3 girlfriend or not --  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. When I look at the flights that  
 9 Virginia Roberts was on between March 8th, 2001, and  
 10 March -- no, let's see. What do I have? No. I'm  
 11 sorry. Strike that.  
 12 If I look at the flights that  
 13 Virginia Roberts is on, according to Dave Roger's  
 14 flight logs, between December 11th, 2000, and  
 15 August 21st, 2002, on initial review, I do not see a  
 16 single entry reflecting a [REDACTED] on those flights.  
 17 Is that a correct understanding of those --  
 18 the passengers on those flights?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation. Speculation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Is there some reason [REDACTED] is not found  
 24 frequently or even at all in the flight logs during  
 25 this period of time?



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 2 MR. PAGLIUCA: Object to form and  
 3 foundation.  
 4 THE WITNESS: Fifth.  
 5 BY MR. CASSELL:  
 6 Q. Isn't it true that the reason [REDACTED] is not  
 7 found on these flight logs is, she was not your  
 8 girlfriend during that period of time?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. And isn't the reason that Ghislaine Maxwell  
 14 is found, I believe, invariably or certainly almost  
 15 invariably on these flights -- I guess I should say  
 16 almost invariably on these flights, is that she was  
 17 your girlfriend at the time?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. In early 2000, you were having threesomes  
 23 with Ms. Maxwell, right?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. I believe we already marked as an  
 5 exhibit --  
 6 MS. MCCAWLEY: July.  
 7 MR. CASSELL: Oh, this is the July. Maybe  
 8 we should mark this as an exhibit. Let me mark  
 9 this as a new exhibit. I think this is JE14 --  
 10 MS. MCCAWLEY: I think this is going to  
 11 be 11.  
 12 MR. CASSELL: Okay. Strike that. This  
 13 will become JE11, which I represent is a  
 14 transcript of Ms. Maxwell taken on  
 15 July 22nd, 2016. You can take a look. I'm  
 16 sorry I don't have an extra one.  
 17 (Plaintiff's Exhibit JE11, Transcript of  
 18 Ms. Maxwell, taken on July 22, 2016 was marked for  
 19 identification.)  
 20 BY MR. CASSELL:  
 21 Q. I'm looking at page 55. If we look at  
 22 page 55 -- I'm sorry. If we start at page 54, we  
 23 see, "Did you engage in sexual activities with anyone  
 24 other than Mr. Epstein at Mr. Epstein's home in Palm  
 25 Beach?"

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 2 Do you see that question? I'm just asking  
 3 you whether you see that question.  
 4 A. Yes, sir.  
 5 Q. After the inevitable form and foundation  
 6 question, Mr. Pagliuca, we see an answer, "I did."  
 7 Do you see that there?  
 8 A. Yes.  
 9 Q. And if we continue on down, we see, "Was  
 10 there more than one person with whom you engaged in  
 11 sexual activities other than Mr. Epstein at  
 12 Mr. Epstein's home?" The answer is, "Yes."  
 13 Do you see that there as well?  
 14 A. Yes.  
 15 Q. And you see the questions here: "I don't  
 16 actually have a name." That's testimony by  
 17 Ms. Maxwell, right?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Yes.  
 21 BY MR. CASSELL:  
 22 Q. This is -- so Ms. Maxwell indicates that  
 23 she knew the name of the person at that time.  
 24 You see that on lines 8 and 9 on page 55?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: I'm sorry. Can you  
 4 repeat the question?  
 5 BY MR. CASSELL:  
 6 Q. Yeah. Lines 8 and 9 there's a question:  
 7 "Did you know the name at that time?" And then line  
 8 9, "At that time I did."  
 9 A. I see.  
 10 Q. Do you see that -- that question there?  
 11 A. Yes.  
 12 Q. This is a long way of saying that  
 13 Ms. Maxwell is indicating that sometime in the late  
 14 '90s and early 2000s she was having threesomes with  
 15 you, herself, and another person?  
 16 A. Is that what it says? I'm sorry.  
 17 MS. MCCAWLEY: Line 9.  
 18 BY MR. CASSELL:  
 19 Q. Line 9 through 10.  
 20 Maybe I should ask it, if Ms. Maxwell  
 21 testified that she had threesomes, who would the  
 22 threesomes have been with?  
 23 MR. PAGLIUCA: Object to form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. She had threesomes with you and another  
 4 women, correct?  
 5 MR. PAGLIUCA: Object to form and  
 6 foundation.  
 7 THE WITNESS: Fifth.  
 8 BY MR. CASSELL:  
 9 Q. And the other woman was not [REDACTED], was  
 10 she?  
 11 MR. PAGLIUCA: Object to form and  
 12 foundation.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Who was the other woman in the threesomes  
 16 that you had in this period of time with Ms. Maxwell?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. The only reason Ms. Maxwell consented to  
 22 have threesomes with you was that she was your  
 23 girlfriend at the time, right?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

1 J. Epstein - Confidential  
 2 Q. Haley Robson reported to Ghislaine Maxwell,  
 3 right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Ghislaine Maxwell controlled Haley Robson,  
 9 right?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. Ghislaine Maxwell used Haley Robson to help  
 15 bring girls to you for sex, right?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. What was Haley Robson's role in your  
 21 household affairs?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 BY MR. CASSELL:  
 4 Q. She was, in fact, your girlfriend from the  
 5 late -- I'm sorry, from around 1996 to around 2005,  
 6 right?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: Fifth.  
 10 BY MR. CASSELL:  
 11 Q. In fact, she actually continued to be your  
 12 girlfriend into -- into 2006, 2007?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. When did you stop considering Ms. Maxwell  
 18 to be your girlfriend?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Mr. Pagliuca asked you some questions about  
 24 Haley Robson. Do you recall those questions?  
 25 A. Yes.

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Mr. Pagliuca asked you some questions about  
 4 whether you are an easy target for lawsuits. Do you  
 5 recall those questions?  
 6 A. Yes.  
 7 Q. One of the reasons you were an easy target  
 8 for lawsuits, sir, was that you sexually abused  
 9 dozens and dozens of underage girls, right?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. One of the reasons you were an easy target  
 15 for Virginia Roberts for sexual assault is because  
 16 you had, in fact, committed sexual assault against  
 17 Virginia Roberts?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 THE WITNESS: Fifth.  
 21 BY MR. CASSELL:  
 22 Q. You settled dozens of lawsuits filed  
 23 against you by underage girls in 2008 and 2009,  
 24 didn't you?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. The reason you settled those lawsuits is  
 6 that you had sexually abused the girls who filed  
 7 lawsuits you against you, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. Every one of the girls who filed a lawsuit  
 13 against you had been sexually abused by you, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. Is there a single girl who has filed a  
 19 lawsuit against you that lacked merit?  
 20 MR. PAGLIUCA: Object to form and  
 21 foundation.  
 22 THE WITNESS: Fifth.  
 23 BY MR. CASSELL:  
 24 Q. When Virginia Roberts, then known as  
 25 Jane Doe 102, filed a lawsuit against you, everything

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1 J. Epstein - Confidential  
 2 in her lawsuit -- I'm sorry, everything in her  
 3 complaint against you was true, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. If I were to give you an unconditional  
 9 waiver of the confidentiality form for the lawsuit  
 10 that Virginia filed against you -- for the settlement  
 11 that Virginia had of the lawsuit she filed against  
 12 you, you would refuse to sign that today, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 MR. GOLDBERGER: And attorney-client  
 17 privilege.  
 18 BY MR. CASSELL:  
 19 Q. Would you sign an unconditional waiver of  
 20 confidentiality with regard to the settlement of that  
 21 lawsuit?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25 MR. GOLDBERGER: Attorney-client

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1 J. Epstein - Confidential  
 2 privilege.  
 3 BY MR. CASSELL:  
 4 Q. As you sit here today, you continue to  
 5 maintain loyalty to Ghislaine Maxwell, today, right?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. You were asserting the Fifth Amendment  
 11 privilege today not only to protect yourself but also  
 12 to protect Ms. Maxwell, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. If you had answered all my questions today,  
 18 it would have become clear that you were involved  
 19 with Ms. Maxwell in sex trafficking of underage girls  
 20 over a multiyear period, right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. If you had answered all my questions today,

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1 J. Epstein - Confidential  
 2 it would have become clear that Ms. Roberts has been  
 3 telling the truth about Ms. Maxwell, right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. Mr. Pagliuca asked about whether you had  
 9 terminated relationships with Ms. Maxwell more than  
 10 15 years ago.  
 11 You would agree with me, sir, that the time  
 12 period 2005 -- time period of 2005 would be inside  
 13 the last 15 years, mathematically?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. You would agree that 2005 is less than  
 19 15 years ago, as we sit here today, right?  
 20 A. Yes.  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 BY MR. CASSELL:  
 24 Q. In 2005, Maxwell had access to certain of  
 25 your bank accounts, right?

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: Object to form.  
 3 Foundation.  
 4 You already asked these questions, by  
 5 the way.  
 6 THE WITNESS: Fifth.  
 7 BY MR. CASSELL:  
 8 Q. In 2005, Maxwell had control on certain of  
 9 your bank accounts, true?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation. Again, you already asked these  
 12 questions.  
 13 THE WITNESS: Fifth.  
 14 BY MR. CASSELL:  
 15 Q. Previously I never had an opportunity to  
 16 ask about who was the signatory on your accounts in  
 17 2005. So I'd like to go over the signatories on your  
 18 accounts in 2005.  
 19 Were there any bank accounts in which  
 20 Maxwell was a signator in 2005, any of your bank  
 21 accounts?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Please describe for me all the signators on  
 4 your bank accounts in 2005.  
 5 A. Fifth.  
 6 Q. I want to talk about the bank accounts that  
 7 were used to take care of the day-to-day management  
 8 of your Palm Beach mansion in 2005. Which bank was  
 9 that account with?  
 10 A. Fifth.  
 11 Q. Who was a signatory on that particular  
 12 account?  
 13 A. Fifth.  
 14 Q. If there are bank records that are produced  
 15 in this case showing Ms. Maxwell as a signator on  
 16 that account, would those bank records be accurate?  
 17 MR. PAGLIUCA: Object to form and  
 18 foundation.  
 19 THE WITNESS: Fifth.  
 20 BY MR. CASSELL:  
 21 Q. It's fair to say that Ms. Maxwell was a  
 22 signator on the bank account that was involved most  
 23 heavily in the day-to-day operations of your West  
 24 Palm Beach mansion, true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 I have a question. I've not seen any  
 4 such bank records. So do you have them and  
 5 have they been produced?  
 6 MR. CASSELL: We'll deal with that  
 7 concern later.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Was Eva Dubin ever your girlfriend?  
 11 A. Fifth.  
 12 Q. Please tell me everything you know about  
 13 Eva Dubin.  
 14 A. Fifth.  
 15 Q. Have you ever had sex with Eva Dubin?  
 16 A. Fifth.  
 17 Q. You, in fact, have had sex with Eva Dubin,  
 18 right?  
 19 A. Fifth.  
 20 Q. You paid for Eva Dubin to attend medical  
 21 school, right?  
 22 A. Fifth.  
 23 Q. One of the reasons you paid for Eva Dubin  
 24 to attend medical school was to keep her quiet about  
 25 her knowledge of your sexual abuse of minors,

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1 J. Epstein - Confidential  
 2 correct?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. Why did you pay to send Eva Dubin to  
 8 medical school?  
 9 MR. PAGLIUCA: Object to form and  
 10 foundation.  
 11 THE WITNESS: Fifth.  
 12 BY MR. CASSELL:  
 13 Q. Eva Dubin continues to be loyal to you  
 14 today, true?  
 15 MR. PAGLIUCA: Object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 MR. CASSELL: I'm getting close to the  
 19 end. I think this might be a good time for  
 20 me to confer with counsel for a few minutes.  
 21 VIDEO TECHNICIAN: Off the record at  
 22 1:56.  
 23 (A recess was taken.)  
 24 VIDEO TECHNICIAN: On the record at  
 25 2:01.

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. I want to ask you some questions about a  
 4 visit to a New York hospital.  
 5 MR. CASSELL: Oh, great. Thank you.  
 6 BY MR. CASSELL:  
 7 Q. You and Ms. Maxwell took Virginia to a  
 8 New York hospital when she was under the age of 18,  
 9 correct?  
 10 MR. PAGLIUCA: Object to form and  
 11 foundation.  
 12 THE WITNESS: Fifth.  
 13 BY MR. CASSELL:  
 14 Q. And at the time, Ms. Roberts was in great  
 15 pain, true?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Because of the pain Ms. Roberts was in, you  
 21 and Ms. Maxwell handled the admission with the  
 22 hospital, correct?  
 23 MR. PAGLIUCA: Object to the form and  
 24 foundation.  
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential  
 2 hospital that Virginia Roberts was?  
 3 MR. PAGLIUCA: Object to form and  
 4 foundation.  
 5 THE WITNESS: Fifth.  
 6 BY MR. CASSELL:  
 7 Q. I'm going to ask you some questions about  
 8 David Copperfield. You know David Copperfield,  
 9 right?  
 10 A. Fifth.  
 11 Q. David Copperfield has been in your  
 12 presence -- has been in your presence -- strike that.  
 13 David Copperfield and you have been  
 14 together in the presence of minor girls under the age  
 15 of 18, right?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 THE WITNESS: Fifth.  
 19 BY MR. CASSELL:  
 20 Q. Have you ever provided girls under the age  
 21 of 18 to David Copperfield for sexual purposes?  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 THE WITNESS: Fifth.  
 25

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. And because you knew it would create  
 4 complications if Ms. Maxwell was a minor under the  
 5 age of 18, you and Ms. Maxwell represented that  
 6 Virginia was 18, true?  
 7 MR. PAGLIUCA: Object to form and  
 8 foundation.  
 9 THE WITNESS: State your -- you want to  
 10 repeat your question?  
 11 MR. CASSELL: Sure.  
 12 THE WITNESS: I think you said  
 13 Miss Maxwell was under the age of 18.  
 14 MR. CASSELL: Let me strike the last  
 15 question and re-ask it. Thank you.  
 16 BY MR. CASSELL:  
 17 Q. Because you knew it would create  
 18 complications if Ms. Roberts was a minor under the  
 19 age of 18, you and Ms. Maxwell represented that  
 20 Miss Roberts was 18 years old, true?  
 21 A. Fifth.  
 22 MR. PAGLIUCA: Object to form and  
 23 foundation.  
 24 BY MR. CASSELL:  
 25 Q. How old did you tell the New York City

1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. Based on everything I know in this case, it  
 4 would seem logical that you provided girls under the  
 5 age of 18 to David Copperfield for sexual purposes.  
 6 Am I missing something if I reach that  
 7 conclusion?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. With regard to the Palm Beach Police  
 13 Department investigation, the Palm Beach Police  
 14 Department identified many persons under the control  
 15 of Ms. Maxwell, who had paid girls for underage sex?  
 16 MR. PAGLIUCA: Object to form and  
 17 foundation.  
 18 BY MR. CASSELL:  
 19 Q. True?  
 20 A. There's no question.  
 21 Q. True?  
 22 MR. PAGLIUCA: Same objection.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. With regard to the girls that the Palm

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1 J. Epstein - Confidential  
2 Beach Police Department investigated, how were the  
3 payments made to those girls?  
4 MR. PAGLIUCA: Object to form and  
5 foundation.  
6 THE WITNESS: Fifth.  
7 BY MR. CASSELL:  
8 Q. Miss Maxwell was aware of all the payments  
9 that were going to the girls in the Palm Beach Police  
10 investigation, right?  
11 MR. PAGLIUCA: Object to form and  
12 foundation.  
13 THE WITNESS: Fifth.  
14 BY MR. CASSELL:  
15 Q. In fact, Miss Maxwell had control of  
16 payments that were made to the girls in the Palm  
17 Beach Police Department investigation?  
18 MR. PAGLIUCA: Object to form and  
19 foundation.  
20 THE WITNESS: Fifth.  
21 BY MR. CASSELL:  
22 Q. Ms. Maxwell is one of your closest friends,  
23 true?  
24 MR. PAGLIUCA: Object to form and  
25 foundation.

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1 J. Epstein - Confidential  
2 THE WITNESS: Fifth.  
3 BY MR. CASSELL:  
4 Q. How close is your relationship with  
5 Ms. Maxwell?  
6 MR. PAGLIUCA: Object to form and  
7 foundation.  
8 THE WITNESS: Fifth.  
9 BY MR. CASSELL:  
10 Q. Can you name anyone who's a closer friend  
11 than yours over the last ten years than Miss Maxwell?  
12 MR. PAGLIUCA: Object to the form and  
13 foundation.  
14 THE WITNESS: Fifth.  
15 BY MR. CASSELL:  
16 Q. You can't name anyone who's been a closer  
17 friend of yours over the last ten years than  
18 Ms. Maxwell, right?  
19 MR. PAGLIUCA: Object to form and  
20 foundation.  
21 THE WITNESS: Fifth.  
22 BY MR. CASSELL:  
23 Q. The person that you have had the most  
24 sexual activity with over the last 20 years is  
25 Ms. Maxwell, true?

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1 J. Epstein - Confidential  
2 MR. PAGLIUCA: Object to form and  
3 foundation.  
4 THE WITNESS: Fifth.  
5 BY MR. CASSELL:  
6 Q. Is there anyone over the last 20 years that  
7 you've had more sexual activity with than  
8 Ms. Maxwell?  
9 MR. PAGLIUCA: Object to form and  
10 foundation.  
11 THE WITNESS: Fifth.  
12 BY MR. CASSELL:  
13 Q. Ms. Maxwell is the longest -- let me see.  
14 Strike that.  
15 You haven't had an intimate relationship  
16 with anyone for a longer period of time than  
17 Ms. Maxwell over the last two decades, have you?  
18 MR. PAGLIUCA: Object to form and  
19 foundation.  
20 THE WITNESS: Fifth.  
21 BY MR. CASSELL:  
22 Q. Through legal counsel and other means, you  
23 have been coordinating with Ms. Maxwell with regard  
24 to this litigation, right?  
25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
2 foundation.  
3 THE WITNESS: Fifth.  
4 MR. GOLDBERGER: Attorney-client  
5 privilege.  
6 BY MR. CASSELL:  
7 Q. You purchased a town home in New York for  
8 Miss Maxwell for millions of dollars, true?  
9 MR. PAGLIUCA: Object to form and  
10 foundation.  
11 You've already asked this question.  
12 It's already been answered.  
13 THE WITNESS: Fifth.  
14 BY MR. CASSELL:  
15 Q. How are you coordinating with Ms. Maxwell  
16 on this litigation?  
17 MR. PAGLIUCA: Object to form and  
18 foundation.  
19 THE WITNESS: Fifth.  
20 BY MR. CASSELL:  
21 Q. You're hoping Ms. Maxwell prevails in this  
22 litigation, true?  
23 MR. PAGLIUCA: Object to form and  
24 foundation.  
25 THE WITNESS: Fifth.

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1 J. Epstein - Confidential  
 2 BY MR. CASSELL:  
 3 Q. What is your arrangement with Ms. Maxwell  
 4 with regard to paying any settle -- any judgment that  
 5 might be reached against her in this case?  
 6 MR. PAGLIUCA: Object to form and  
 7 foundation.  
 8 THE WITNESS: Fifth.  
 9 BY MR. CASSELL:  
 10 Q. Ms. Maxwell has had discussions with you  
 11 about whether you would pay a judgment in this action  
 12 against her, right?  
 13 MR. PAGLIUCA: Object to form and  
 14 foundation.  
 15 THE WITNESS: Fifth.  
 16 BY MR. CASSELL:  
 17 Q. Your interests in Ms. Maxwell are  
 18 compatible in this case, true?  
 19 MR. PAGLIUCA: Object to form and  
 20 foundation.  
 21 THE WITNESS: Fifth.  
 22 BY MR. CASSELL:  
 23 Q. Both you and Ms. Maxwell are hoping that  
 24 the case would be dismissed, true?  
 25 MR. PAGLIUCA: Object to form and

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1 J. Epstein - Confidential  
 2 foundation.  
 3 THE WITNESS: Fifth.  
 4 BY MR. CASSELL:  
 5 Q. Previously you sent e-mails to Ms. Maxwell  
 6 indicating your desire to have the publicity in this  
 7 case die down, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. If the case were to settle, that would help  
 13 the publicity in this case die down, right?  
 14 MR. PAGLIUCA: Object to form and  
 15 foundation.  
 16 THE WITNESS: Fifth.  
 17 BY MR. CASSELL:  
 18 Q. If this case were to resolve, that would be  
 19 useful for your purposes and Maxwell's purposes,  
 20 right?  
 21 MR. PAGLIUCA: Object to form and  
 22 foundation.  
 23 THE WITNESS: Fifth.  
 24 BY MR. CASSELL:  
 25 Q. You have also been coordinating with

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1 J. Epstein - Confidential  
 2 Alan Dershowitz with regard to this litigation,  
 3 right?  
 4 MR. PAGLIUCA: Object to form and  
 5 foundation.  
 6 THE WITNESS: Fifth.  
 7 MR. GOLDBERGER: And attorney-client  
 8 privilege.  
 9 BY MR. CASSELL:  
 10 Q. You are in a joint defense arrangement with  
 11 Alan Dershowitz at this time?  
 12 MR. PAGLIUCA: Object to form and  
 13 foundation.  
 14 THE WITNESS: Fifth.  
 15 MR. GOLDBERGER: Attorney-client  
 16 privilege -- I'm sorry. Attorney-client  
 17 privilege, and to the extent there is a  
 18 confidentiality agreement in place or -- or  
 19 a joint defense agreement, I would object on  
 20 that basis.  
 21 BY MR. CASSELL:  
 22 Q. You have a common interest agreement with  
 23 Alan Dershowitz, right?  
 24 MR. PAGLIUCA: Object to form and  
 25 foundation.

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1 J. Epstein - Confidential  
 2 THE WITNESS: Fifth.  
 3 MR. GOLDBERGER: Attorney-client  
 4 privilege.  
 5 BY MR. CASSELL:  
 6 Q. You have a common interest with  
 7 Alan Dershowitz in this litigation, right?  
 8 MR. PAGLIUCA: Object to form and  
 9 foundation.  
 10 THE WITNESS: Fifth.  
 11 BY MR. CASSELL:  
 12 Q. You have a common interest with  
 13 Ghislaine Maxwell in this litigation, right?  
 14 MR. PAGLIUCA: Asked and answered, this  
 15 question. I'm going to object to form and  
 16 foundation.  
 17 THE WITNESS: Fifth.  
 18 MR. CASSELL: I have no further  
 19 questions.  
 20 MR. PAGLIUCA: I have no additional  
 21 questions.  
 22 MR. GOLDBERGER: Excellent.  
 23 MR. CASSELL: Thank you.  
 24 VIDEO TECHNICIAN: The time is 2:08.  
 25 This concludes the deposition.

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1 J. Epstein - Confidential  
 2 MR. PAGLIUCA: I do want a transcript.  
 3 THE COURT REPORTER: Do you have a  
 4 standing order?  
 5 MR. PAGLIUCA: Yeah. They should have  
 6 whatever we want. I think it's E-Tran.  
 7 THE COURT REPORTER: A rough  
 8 transcript?  
 9 MR. PAGLIUCA: I don't need a rough, I  
 10 don't think.  
 11 (Signature was not waived. The  
 12 deposition concluded at 2:08 p.m.)  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

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1 REPORTER'S CERTIFICATE  
 2  
 3 STATE OF FLORIDA  
 4 COUNTY OF PALM BEACH  
 5  
 6 I, DARLINE MARIE WEST, RPR, certify that I was  
 7 authorized to and did stenographically report the  
 8 foregoing deposition; and that the transcript is a  
 9 true record thereof.  
 10  
 11 I further certify that I am not a relative,  
 12 employee, attorney, or counsel of any of the parties,  
 13 nor am I a relative or employee of any of the  
 14 parties' attorney or counsel connected with the  
 15 action, nor am I financially interested in the  
 16 action.  
 17  
 18 Dated this 13th day of September 2016.  
 19  
 20  
 21  
 22 \_\_\_\_\_  
 23 DARLINE MARIE WEST, RPR  
 24  
 25

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1 CERTIFICATE OF OATH  
 2  
 3 STATE OF FLORIDA  
 4 COUNTY OF PALM BEACH  
 5  
 6  
 7 I, the undersigned authority, certify that  
 8 JEFFREY EPSTEIN personally appeared before me and was  
 9 duly sworn on September 9, 2016.  
 10  
 11 WITNESS my hand and official seal this 13th day  
 12 of September 2016.  
 13  
 14  
 15  
 16 \_\_\_\_\_  
 17 DARLINE MARIE WEST  
 18 Notary Public  
 19  
 20 My Commission Expires:  
 21 October 26, 2017  
 22 #FF 060662  
 23  
 24  
 25

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1 CERTIFICATE  
 2  
 3 STATE OF FLORIDA  
 4 COUNTY OF PALM BEACH  
 5  
 6 I, JEFFREY EPSTEIN, hereby certify that I  
 7 have read the foregoing transcript of my deposition  
 8 and that the statements contained therein, together  
 9 with any additions or corrections made on the  
 10 attached Errata Sheet, are true and correct.  
 11  
 12 Dated this \_\_\_\_ day of \_\_\_\_\_, 2016.  
 13  
 14  
 15  
 16 \_\_\_\_\_  
 17 JEFFREY EPSTEIN  
 18  
 19 The foregoing certificate was subscribed to  
 20 before me this \_\_\_\_ day of \_\_\_\_\_, 2016,  
 21 by the witness who has produced a  
 22 \_\_\_\_\_ as identification and who did  
 23 not take an additional oath.  
 24  
 25 \_\_\_\_\_  
 Notary Public  
 my commission expires:





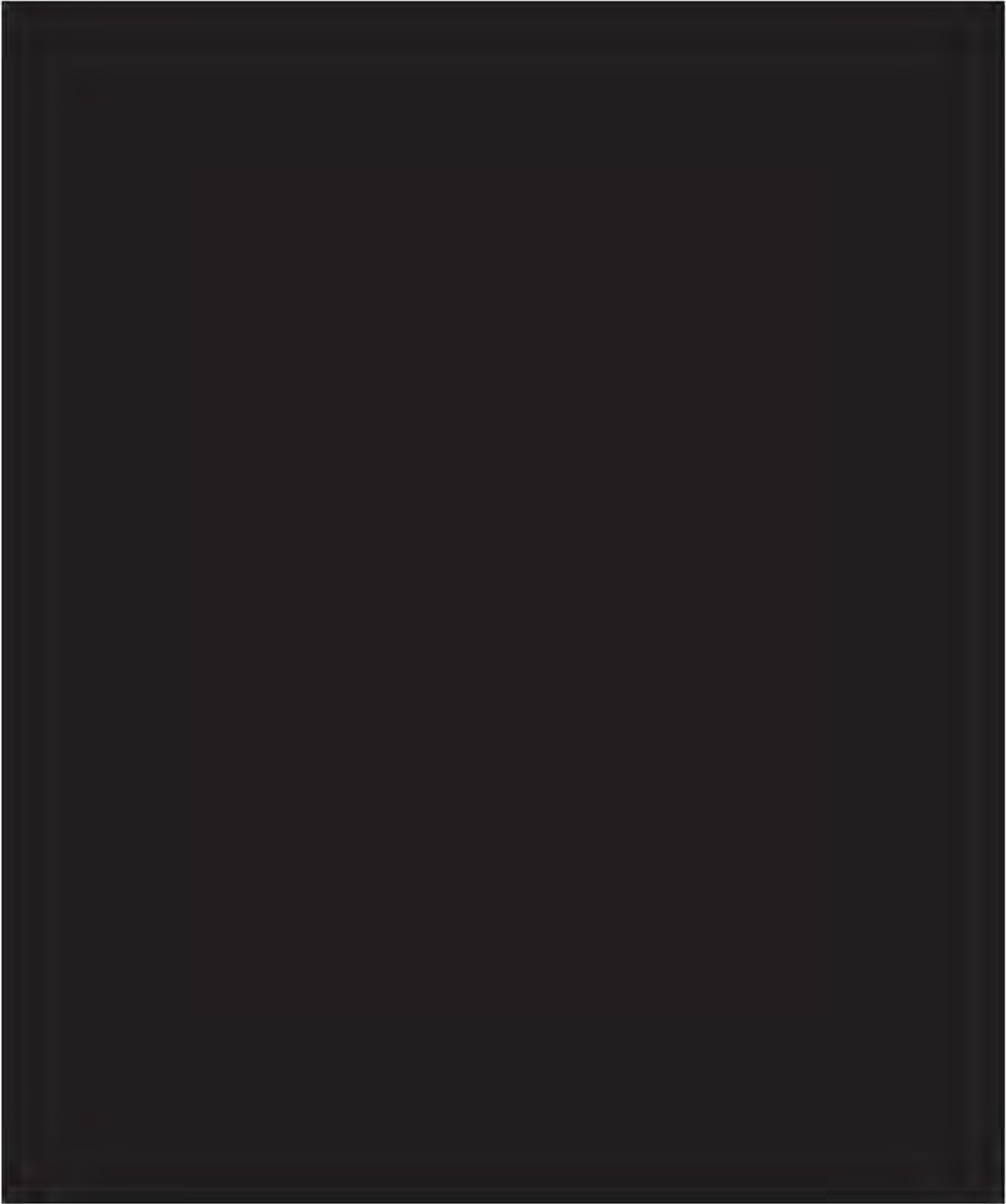


















































































EXHIBIT 1  
(FILE UNDER SEAL)

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Page 1

HIGHLY CONFIDENTIAL AEO  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

Case No:

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----x

HIGHLY CONFIDENTIAL  
DEPOSITION OF SARAH RANSOME  
NEW YORK, NEW YORK  
Friday, February 17, 2017

Reported by:

JEREMY RICHMAN

JOB NO: 300491

MAGNA LEGAL SERVICES  
320 West 37th Street, 12th Floor  
New York, New York 10018  
(866) 624-6221



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HIGHLY CONFIDENTIAL AEO

February 17, 2017

9:00 a.m.

DEPOSITION of SARAH RANSOME, held  
at the offices of Boies, Schiller & Flexner,  
575 Lexington Avenue, New York, New York,  
before JEREMY RICHMAN, a Shorthand Reporter and  
Notary Public of the State of New York.

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1 HIGHLY CONFIDENTIAL AEO

2 APPEARANCES:

3

4 BOIES, SCHILLER & FLEXNER, LLP

5 Attorneys for plaintiff

6 401 East Las Olas Boulevard, Suite 1200

7 Fort Lauderdale, FL 33301-2211

8 BY: SIGRID STONE MCCAWLEY, ESQ.

9 (smccawley@bsfllp.com)

10

11

12 HADDON, MORGAN AND FOREMAN, P.C

13 Attorneys for Defendant

14 150 East 10th Avenue

15 Denver, CO 80230

16 BY: LAURA A. MENNINGER, ESQ.

17 JEFFREY S. PAGLIUCA, ESQ.

18 (lmenninger@hmflaw.com)

19 (jpagliuca@hmflaw.com)

20

21

22

23

24

25

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1 HIGHLY CONFIDENTIAL AEO

2 APPEARANCES (Continued):

3

4 J. STANLEY POTTINGER, PLLC

5 Attorneys for the witness

6 49 Twin Lakes Road, Suite 100

7 South Salem, NY 10590

8 BY: J. STANLEY POTTINGER, ESQ.

9 (stanpottinger@aol.com)

10

11

12 MINTZ & GOLD, LLP

13 Attorneys for the witness

14 600 Third Avenue

15 New York, NY 10016

16 BY: PETER GUIRGUIS, ESQ.

17 (guirguis@mintzandgold.com)

18

19

20 ALSO PRESENT:

21 GHISLAINE MAXWELL, via teleconference

22

23

24

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1 HIGHLY CONFIDENTIAL AEO

2 IT IS HEREBY STIPULATED AND AGREED  
3 by and between the attorneys for the respective  
4 parties herein, that filing and sealing be and  
5 the same are hereby waived.

6 IT IS FURTHER STIPULATED AND AGREED  
7 that all objections, except as to form of the  
8 question, shall be reserved to the time of the  
9 trial.

10 IT IS FURTHER STIPULATED AND AGREED  
11 that the within deposition may be sworn to and  
12 signed before any officer authorized to  
13 administer an oath, with the same force and  
14 effect as if signed and sworn to before the  
15 Court.

16

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20 - oOo -

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MENNINGER: If we could  
3 have counsel enter their  
4 appearances for the record,  
5 please.

6 MR. GUIRGUIS: Sure. My  
7 name is Peter Guirguis. I'm  
8 appearing on behalf of the  
9 witness today.

10 MS. MCCAWLEY: Sigrid  
11 McCawley on behalf of Virginia  
12 Giuffre, the plaintiff in the  
13 action.

14 MR. POTTINGER: Stan  
15 Pottinger on behalf of the  
16 witness.

17 MS. MENNINGER: Laura  
18 Menninger and Jeffrey Pagliuca on  
19 behalf of Ms. Maxwell, who is  
20 appearing by telephone.

21 SARAH RANSOME, having been  
22 called as a witness, having first  
23 been duly sworn by a Notary  
24 Public (Jeremy Richman) of the  
25 State of New York, was examined

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1 HIGHLY CONFIDENTIAL AEO

2 and testified as follows:

3 EXAMINATION BY

4 MS. MENNINGER:

5 Q. Good morning, Ms. Ransome.

6 A. Good morning.

7 Q. Can you please give us your  
8 full name.

9 A. Sarah Emma Ashley Ransome.

10 Q. And what is your birth date?

11 A. 13th of the 8th, 1984.

12 Q. And what is your current  
13 address?

14 MR. GUIRGUIS: I'm going to  
15 object to current address.

16 Q. You can answer.

17 MR. GUIRGUIS: You can give  
18 your last permanent address.

19 A. It was Carrer de Canuda.

20 (An off-the-record  
21 discussion was held.)

22 A. That's Barcelona, and I  
23 can't remember the post code.

24 Q. And what does that mean,  
25 that's your last permanent address?

Highly Confidential

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1 HIGHLY CONFIDENTIAL AEO

2 A. I reside there.

3 Q. Do you rent an apartment?

4 A. My partner does.

5 Q. Who is your partner?

6 MR. GUIRGUIS: Objection.

7 Q. Who is your partner?

8 THE WITNESS: Do I have to  
9 answer that?

10 MR. GUIRGUIS: Yes.

11 A. Peter Coulthard.

12 Q. I'm sorry?

13 A. Peter Coulthard.

14 Q. How do you spell that last  
15 name?

16 A. C-O-U-L-T-H-A-R-D.

17 Q. And how long has Peter been  
18 your partner?

19 MR. GUIRGUIS: I'm going to  
20 object. I'm not sure what the  
21 relevance of this is or where  
22 you're going with this.

23 Q. How long has Peter been your  
24 partner?

25 THE WITNESS: Sorry, can I

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1           HIGHLY CONFIDENTIAL AEO  
2           just ask a question? I would  
3           like to just clarify. When you  
4           say objection, does that mean I  
5           actually have to answer the  
6           question? Because that's  
7           irrelevant.

8           MR. GUIRGUIS: Right.  
9           Unless I'm telling you not to  
10          answer, you need to answer.

11          THE WITNESS: So I don't  
12          need to answer?

13          MR. GUIRGUIS: No, you do  
14          need to answer this.

15          A.        Okay. We've been together  
16          almost a year.

17          Q.        And what is your current  
18          occupation?

19          A.        I'm a writer.

20          Q.        And what do you write?

21          A.        Just stuff, you know? Just  
22          about factual stuff. You know, just a  
23          bit of this, bit of that.

24          Q.        Have you been paid for any  
25          of your writing?



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1 HIGHLY CONFIDENTIAL AEO

2 A. No. It's more of a hobby,  
3 really.

4 Q. Are you employed?

5 A. Nope.

6 Q. Do you have any source of  
7 income?

8 A. My partner --

9 MR. GUIRGUIS: I'm going to  
10 object to that. Income is out.

11 You don't have to answer  
12 that.

13 Q. Do you have any source of  
14 income?

15 MR. GUIRGUIS: I just  
16 objected to that. You don't have  
17 to answer.

18 MS. MENNINGER: Is there a  
19 privilege you're asserting?

20 MR. GUIRGUIS: I'm not sure  
21 what the relevance is, and I'm  
22 not going to allow --

23 MS. MENNINGER: Do you  
24 believe that relevance is a  
25 proper objection during a

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1 HIGHLY CONFIDENTIAL AEO

2 deposition?

3 MR. GUIRGUIS: I believe  
4 that if you go far afield with  
5 this witness, that the judge is  
6 not going to appreciate it, and  
7 that I'm not going to just sit  
8 here and be a potted plant and  
9 allow her to answer any questions  
10 on any subject that you see fit.

11 MS. MENNINGER: On  
12 relevance? You're instructing  
13 her not to answer on a relevance  
14 objection? Is that what you're  
15 saying?

16 MR. GUIRGUIS: I just  
17 objected.

18 MS. MCCAWLEY: I'm going to  
19 object on behalf of the  
20 plaintiff, Virginia Giuffre, to  
21 the extent that you're requesting  
22 from a nonparty financial  
23 information, which is not allowed  
24 under New York law.

25 MS. MENNINGER: I have asked

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1           HIGHLY CONFIDENTIAL AEO  
2           her whether she has any source of  
3           income, and you're going to  
4           object --

5           MS. MCCAWLEY:    Yes.

6           MS. MENNINGER:   -- and  
7           instruct her not to answer as  
8           well?

9           MS. MCCAWLEY:    I'm not  
10          instructing her not to answer.  
11          I'm just making a record.

12          MR. GUIRGUIS:   It's  
13          financial information --

14          MS. MENNINGER:   And whether  
15          she has a financial motive is  
16          relevant.

17          Q.        So I'm going to ask you a  
18          last time:   Do you have any source of  
19          income?

20          MR. GUIRGUIS:    I'm going to  
21          instruct you again not to answer.

22          Q.        Has any of your writing been  
23          published by anyone?

24          A.        No.

25          Q.        Have you sought to have your

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1 HIGHLY CONFIDENTIAL AEO

2 writing published by anyone?

3 A. No.

4 Q. What is your partner's  
5 occupation?

6 MR. GUIRGUIS: Objection.

7 MS. MCCAWLEY: Objection.

8 MR. GUIRGUIS: I'm going to  
9 object, yeah. Same objection.

10 MS. MENNINGER: If you are  
11 going to instruct the witness not  
12 to answer, please say that  
13 contemporaneous with your  
14 objection, because there are two  
15 different things: There are  
16 objections and instructions not  
17 to answer.

18 So are you instructing her  
19 not to answer what her partner's  
20 occupation is?

21 MR. GUIRGUIS: Right. Same  
22 objection. I'm instructing the  
23 witness not to answer on the  
24 basis of both relevance and  
25 because she is a third-party non-

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1 HIGHLY CONFIDENTIAL AEO

2 -- I'm sorry -- nonparty witness  
3 who you are asking for financial  
4 information about --

5 MS. MENNINGER: No, I asked  
6 for an occupation.

7 MS. MCCAWLEY: I'm going to  
8 object. That relates directly to  
9 financial information, so it's  
10 covered by New York law with  
11 respect to nonparty witnesses.

12 Q. What are the names of your  
13 parents?

14 A. Elizabeth Shaw and Mark  
15 Ransome.

16 Q. How do you spell Shaw?

17 A. S-H-A-W.

18 Q. And where do your parents  
19 live?

20 A. I'm not comfortable giving  
21 my mother's and my father's address to  
22 you.

23 MS. MENNINGER: Are you  
24 instructing her not to answer?

25 MS. MCCAWLEY: Do you want

Highly Confidential

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1 HIGHLY CONFIDENTIAL AEO

2 to confer?

3 MR. GUIRGUIS: Give me a  
4 moment on this.

5 THE WITNESS: We're really  
6 well organized.

7 (Time noted: 9:21 a.m.)

8 (Recess.)

9 (Time noted: 9:23 a.m.)

10 Q. Ms. Ransome, there was a  
11 question pending when you took a break  
12 with your lawyers. Can you please  
13 answer the question.

14 MR. GUIRGUIS: I'm  
15 instructing the witness not to  
16 answer questions regarding  
17 current information about her own  
18 location, her family's location,  
19 things of that nature.

20 The witness has expressed to  
21 me fears of harassment and the  
22 belief that she's being followed,  
23 and my understanding is that  
24 there are other witnesses that  
25 have had similar fears and

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1 HIGHLY CONFIDENTIAL AEO

2 concerns.

3 And unless you make some  
4 sort of proffer of the actual  
5 relevance of her parents'  
6 addresses, wherever those are,  
7 I'm not going to have her answer.

8 MS. MENNINGER: Okay. Where  
9 does that understanding come  
10 from, please, Mr. Guirguis?

11 Mr. Guirguis, where does  
12 your understanding come from?  
13 You just made a factual  
14 representation. I would like to  
15 know where your understanding  
16 comes from.

17 MR. GUIRGUIS: Yeah, I'm not  
18 being deposed. I'm not going to  
19 answer your questions.

20 MS. MENNINGER: All right.

21 Q. Ms. Ransome, did you agree  
22 to be a witness in the case of Giuffre  
23 versus Maxwell?

24 A. Yes.

25 Q. Did you voluntarily agree to

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1 HIGHLY CONFIDENTIAL AEO

2 do that?

3 A. Yes.

4 Q. Were you promised anything  
5 in exchange for your testimony in the  
6 Giuffre versus Maxwell case?

7 A. No.

8 Q. Were you provided legal  
9 counsel?

10 A. Sorry, does that mean --

11 MS. MCCAWLEY: You have a  
12 lawyer, yes?

13 MR. GUIRGUIS: Yes.

14 A. Yes.

15 Q. Okay. How many lawyers do  
16 you have now?

17 A. Three.

18 MS. MENNINGER: I would like  
19 the record to reflect that  
20 witness is checking with the  
21 lawyers to get answers to these  
22 questions.

23 MR. POTTINGER: Wait, wait,  
24 wait. Objection.

25 MR. GUIRGUIS: There is



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1                   HIGHLY CONFIDENTIAL AEO  
2                   absolutely no exchange. No words  
3                   were spoken by --

4                   MS. MENNINGER:  
5                   Mr. Pottinger, did you put up a  
6                   number of fingers?

7                   Did you put up a number of  
8                   fingers, Mr. Pottinger?

9                   MR. POTTINGER: You said,  
10                  I'm going to object because the  
11                  witness is answering these  
12                  questions, in the plural.

13                  MS. MENNINGER: Mm-hmm.

14                  MR. POTTINGER: That is  
15                  inaccurate. When she looked at  
16                  me to ask how many lawyers she  
17                  had, I said three with three  
18                  fingers. That is a single  
19                  request on her part and a single  
20                  answer, not multiple.

21                  MS. MENNINGER: No. She has  
22                  looked to her lawyers for  
23                  previous answers.

24                  We'll just make a record as  
25                  we go along. Thank you.

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MCCAWLEY: You could  
3 have had a videotape here so that  
4 we would have a record of that,  
5 because I think your verbal  
6 record is inaccurate, so...

7 MR. POTTINGER: And, in  
8 fact, she -- this is Mr.  
9 Pottinger speaking.

10 And, in fact, she has not  
11 looked at me during this  
12 deposition except one time, which  
13 was for what I took to be a  
14 request to know how many lawyers  
15 she has.

16 MS. MENNINGER: So are you  
17 being deposed, Mr. Pottinger?

18 MR. POTTINGER: I am not.

19 Q. Ms. Ransome, how many  
20 lawyers do you think you have?

21 A. Three.

22 Q. Can you please name them?

23 A. Peter, Sigrid and Stan.

24 Q. Is Mr. Bradley Edwards  
25 representing you?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Yes.

3 Q. Is Mr. Paul Cassell  
4 representing you?

5 A. No.

6 Q. Is Mr. David Boies  
7 representing you?

8 A. Yes.

9 MS. MCCAWLEY: I just want  
10 to be clear for the record if  
11 you're talking about representing  
12 generally or you're talking about  
13 a particular matter. Because we  
14 have a couple matters.

15 MS. MENNINGER: I'm asking  
16 questions here.

17 MS. MCCAWLEY: No, I  
18 understand that you have to make  
19 the record clear --

20 MS. MENNINGER: Ms.  
21 McCawley, if you want to ask her  
22 questions later, you are more  
23 than welcome to do so. I am  
24 going to ask questions of the  
25 witness I am deposing.

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MCCAWLEY: Well, we want  
3 the record to be clear that there  
4 are more than one action --

5 MS. MENNINGER: You can ask  
6 questions when you're doing your  
7 questioning. I'm doing my  
8 questioning now, and so I will  
9 ask the questions.

10 MS. MCCAWLEY: I'm going to  
11 object. The record should be  
12 clear there is more than one  
13 action pending here. She is  
14 represented here as a nonparty  
15 witness, and she also has her own  
16 action pending.

17 MR. PAGLIUCA: Thank you for  
18 that speaking objection, Ms.  
19 McCawley, and communicating that  
20 information to the witness, which  
21 you know is totally improper.

22 MS. MCCAWLEY: Now, that's  
23 two people objecting right now.  
24 Is it going to be Laura taking  
25 this deposition or you, Jeff?

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1                   HIGHLY CONFIDENTIAL AEO  
2                   You guys have done this to me  
3                   before, and it's not a position  
4                   where you're allowed to object  
5                   and she's allowed to object. You  
6                   guys pulled that at the last  
7                   deposition, so please do not do  
8                   this here.

9                   MR. PAGLIUCA: I was just  
10                  thanking you.

11                 Q.         All right. So the number of  
12                 lawyers we're up to so far is  
13                 Mr. Guirguis, Ms. McCawley,  
14                 Mr. Pottinger, Mr. Edwards, Mr. Boies.

15                         That's five, correct?

16                 A.         Can I just ask you a  
17                 question?

18                 Q.         No, you cannot.

19                 A.         Okay.

20                 Q.         Are those five lawyers that  
21                 are representing you?

22                         MR. GUIRGUIS: Objection.

23                 Q.         Yes or no?

24                 A.         Yes.

25                 Q.         All right. Anyone else

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Page 23

1 HIGHLY CONFIDENTIAL AEO

2 representing you?

3 A. No.

4 Q. Ms. Schultz? Is

5 Ms. Meredith Schultz representing you?

6 A. No.

7 Q. How much are you paying for  
8 any of those lawyers?

9 A. It's on a pro-bono basis.

10 Q. Do you know what each of  
11 those lawyers' normal hourly rates  
12 are?

13 A. No.

14 Q. Do you know how many hours  
15 you have spent with your attorneys?

16 A. No.

17 MR. GUIRGUIS: Objection.

18 Q. How many hours have you  
19 spent with Mr. Guirguis?

20 MR. GUIRGUIS: Objection.

21 Q. Without communicating to me  
22 any information you and he have  
23 shared.

24 A. A few, maybe.

25 Q. How many?

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1 HIGHLY CONFIDENTIAL AEO

2 A. About 11 hours in total.

3 Q. When is the first time that  
4 you met Mr. Guirguis?

5 MR. GUIRGUIS: Objection.

6 MS. MCCAWLEY: You can  
7 answer.

8 MR. GUIRGUIS: You can  
9 answer.

10 A. Yesterday.

11 Q. You met Mr. Guirguis  
12 yesterday? Was that your answer?

13 A. Yes.

14 Q. And who is paying for  
15 Mr. Guirguis's fees, if you know?

16 A. I have a pro-bono  
17 arrangement.

18 Q. Do you know if he's  
19 receiving money from anyone else in  
20 exchange for representing you?

21 A. No.

22 Q. No, you don't know, or no,  
23 he is not?

24 A. I don't know.

25 Q. How many hours have you

Highly Confidential

Page 25

1 HIGHLY CONFIDENTIAL AEO

2 spent with Ms. McCawley?

3 A. Can I just clarify that  
4 question? Does that mean on the  
5 phone? Like what are you referring  
6 to, in person or --

7 Q. Either one. How many hours,  
8 how much time have you spent with  
9 Ms. McCawley in person?

10 A. I met with Ms. McCawley for  
11 the first time in person yesterday,  
12 but I've spent -- yeah, we've been --  
13 Ms. McCawley was the first person I  
14 actually spoke to.

15 Q. And how many hours have you  
16 spent with her on the phone?

17 A. Many, many hours.

18 Q. Approximately how many?

19 A. I don't know.

20 Q. Five?

21 MR. GUIRGUIS: Objection.

22 A. More than five.

23 Q. Ten?

24 MR. GUIRGUIS: Objection.

25 Q. Ten?



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1 HIGHLY CONFIDENTIAL AEO

2 A. Well, 10, 15. She's been  
3 with me the whole way since when I  
4 came forward, so she's been a very  
5 prominent person.

6 Q. And when did you first speak  
7 with her on the phone?

8 A. I think it was --

9 Q. Without telling me what you  
10 said.

11 A. I think it was November.

12 Q. November what?

13 A. I can't remember the date.

14 Q. Early November? Late  
15 November?

16 MR. GUIRGUIS: Objection.

17 A. I can't remember.

18 Q. Was she speaking to you on  
19 your cell phone or a landline?

20 A. Cell phone.

21 Q. A mobile number or a  
22 landline?

23 A. A cell phone.

24 Q. Okay. And what's that cell  
25 phone number?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I don't have it anymore.

3 Q. That's okay. What's the  
4 cell phone number?

5 A. I actually don't know. I  
6 can't remember my cell phone number.  
7 I don't have anything with me, so I  
8 can't remember that number offhand.

9 Q. How long did you have that  
10 cell phone?

11 A. About eight months.

12 Q. What happened to it?

13 A. I got rid of it.

14 Q. Why?

15 A. Because I fear for my life  
16 because of Jeffrey Epstein and  
17 Ghislaine Maxwell.

18 Q. What did you do with it?

19 A. I sold it.

20 Q. When?

21 A. November.

22 Q. Before or after you first  
23 spoke with Ms. McCawley?

24 A. Before.

25 Q. So then how did you speak

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1 HIGHLY CONFIDENTIAL AEO

2 with Ms. McCawley over the phone?

3 A. On my partner's cell phone.

4 Q. What's his cell phone  
5 number?

6 MS. MCCAWLEY: Objection.

7 What's the relevance of her  
8 partner's cell phone?

9 Again, this is irrelevant.  
10 It's harassing. It's -- you're  
11 seeking information to be able  
12 to -- the witness has already  
13 expressed fear about her --  
14 people currently going after her.  
15 So we would object to that  
16 intimidation of a nonparty  
17 witness.

18 Q. What is your partner's cell  
19 phone number?

20 MR. GUIRGUIS: I'm directing  
21 the witness not to answer.

22 Q. How many hours have you  
23 spent speaking with Mr. Pottinger?

24 A. I've been speaking to  
25 Mr. Pottinger from November.

Highly Confidential

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       When in November?

3           A.       I can't remember.

4           Q.       On your same cell phone that  
5 you got rid of?

6           A.       No, on my partner's cell  
7 phone.

8           Q.       And when did you first meet  
9 Mr. Pottinger in person?

10          A.       It was in the beginning of  
11 January.

12          Q.       And where was that meeting?

13          A.       Barcelona.

14          Q.       Where in Barcelona?

15          A.       Barcelona. It's Barcelona.  
16 We meet -- I can't remember the area.

17          Q.       In a restaurant? In a  
18 hotel? In an office?

19          A.       In a hotel.

20          Q.       And how long did you spend  
21 with Mr. Pottinger on that occasion?

22          A.       Two days.

23          Q.       How many hours over the two  
24 days?

25          A.       Gosh, about 16.

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2 Q. How many hours did you spend  
3 with Mr. Edwards?

4 MS. MCCAWLEY: Objection.

5 A. The same amount.

6 Q. He was with Mr. Pottinger?

7 A. Yeah, yes.

8 Q. And Mr. Boies, how much time  
9 have you spent with Mr. Boies?

10 A. I haven't spent any time  
11 with him yet.

12 Q. Have you met him?

13 A. No.

14 Q. Have you spoken to him on  
15 the phone?

16 A. No.

17 Q. And you have not paid any  
18 money for any of those lawyers' time,  
19 correct?

20 A. Yes.

21 Q. In addition to your free  
22 legal counsel, were you given anything  
23 else in exchange for your agreement to  
24 be a witness in this case?

25 MR. GUIRGUIS: Objection.

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2 A. No.

3 Q. Did you fly over here?

4 A. Yes.

5 Q. From Barcelona?

6 A. Yes.

7 Q. Did you pay for the plane  
8 ticket?

9 A. Yes.

10 Q. How much was the plane  
11 ticket?

12 A. It was -- I think it was  
13 1,000 -- it was 1,000 -- I can't  
14 remember the exact total.

15 Q. Has anyone agreed to  
16 reimburse you for that?

17 A. No.

18 Q. And you're staying where  
19 while you're here?

20 MR. GUIRGUIS: Objection.

21 And direct you not to answer  
22 that.

23 Q. Are you staying in a hotel  
24 while you're here?

25 MR. GUIRGUIS: You can

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2 answer that.

3 A. Yeah.

4 Q. Are you paying for that?

5 MR. GUIRGUIS: Objection.

6 I'm directing you not to  
7 answer.

8 MS. MCCAWLEY: You can  
9 answer.

10 MR. GUIRGUIS: I think you  
11 can answer.

12 MS. MCCAWLEY: Yeah, I think  
13 you can answer.

14 MR. GUIRGUIS: That's fine.  
15 I agree.

16 MS. MCCAWLEY: You're a  
17 nonparty witness. You can answer  
18 that question.

19 MS. MENNINGER: Who is --

20 MS. MCCAWLEY: I am  
21 representing Virginia. He is  
22 representing the witness.

23 MS. MENNINGER: Well, you're  
24 representing the witness as well,  
25 right?

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2 MS. MCCAWLEY: I'm not.

3 MS. MENNINGER: Well, did  
4 you just tell her she can answer  
5 a question?

6 MS. MCCAWLEY: I did.

7 Q. Are you paying for the  
8 hotel?

9 A. No.

10 Q. Who's paying for the hotel?

11 A. It's on expenses, I think,  
12 of a witness. It's expenses from --  
13 yeah, I don't know, actually.

14 Q. You don't know who is paying  
15 for your hotel?

16 A. No.

17 Q. It's not you?

18 A. No.

19 Q. And how much per night is  
20 your hotel?

21 A. I have no idea.

22 Q. How long are you staying  
23 here on this trip?

24 A. Just for the deposition.

25 Q. Okay. When did you arrive?



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2 A. It was Tuesday, late Tuesday  
3 night.

4 Q. And when are you leaving?

5 A. Tomorrow evening.

6 Q. In addition to your legal  
7 counsel and your hotel, is there  
8 anything else you've been given in  
9 exchange for your --

10 A. No.

11 Q. -- to be a witness in this  
12 case?

13 You have to wait for me to  
14 finish my question before you answer.

15 A. Sorry.

16 Q. Have you been given anything  
17 else?

18 A. No.

19 Q. Have you been promised  
20 anything else?

21 A. No.

22 Q. Have you been promised that  
23 you would have counsel to help you  
24 bring a lawsuit against a number of  
25 people?

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2 MS. MCCAWLEY: Objection.

3 To the extent this gets into  
4 attorney/client privileged  
5 information, you're not allowed  
6 to answer.

7 Q. Have your lawyers agreed to  
8 bring a lawsuit on your behalf against  
9 a number of people?

10 A. Yes.

11 Q. And are you paying for that  
12 counsel?

13 A. No.

14 Q. Have you reached any  
15 agreement about a contingency fee for  
16 that case?

17 A. Can you explain what  
18 contingency means? Sorry.

19 Q. Do you expect to receive  
20 money as a result of that lawsuit?

21 A. Oh, no. No.

22 Q. You're not asking to receive  
23 any money as a result of that lawsuit?

24 A. No. No.

25 Q. All right. So have you had

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1 HIGHLY CONFIDENTIAL AEO

2 any agreements regarding writing a  
3 book --

4 A. No.

5 Q. -- about your experience?

6 You have to wait for me to  
7 finish my question.

8 Have you had any agreements  
9 with your lawyers about media rights  
10 in any form?

11 MR. GUIRGUIS: Objection to  
12 the extent that you're asking  
13 about communications with the  
14 attorneys.

15 MS. MENNINGER: I'm asking  
16 about her arrangement with her  
17 attorneys, which is not  
18 privileged.

19 A. Can you please repeat the  
20 question.

21 Q. Have you reached any  
22 agreement with your attorneys  
23 regarding media rights for your story?

24 A. No.

25 Q. Have you talked to anyone

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1 HIGHLY CONFIDENTIAL AEO

2 about publishing anything relating to  
3 your story?

4 A. Can you repeat the question,  
5 please.

6 MS. MENNINGER: Can you read  
7 it back.

8 (Requested portion of the  
9 record was read back.)

10 A. Yes, I have.

11 Q. Who have spoken to?

12 A. The New York Post.

13 Q. Who at the New York Post?

14 A. Maureen Callahan.

15 Q. And when did you speak with  
16 her?

17 A. I think it was later  
18 October.

19 Q. Have you spoken with her  
20 since?

21 A. No.

22 Q. And how long did you speak  
23 to her?

24 A. I spoke to her for, gosh,  
25 about 30 minutes on the phone once.

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2           Q.       And what was -- what did you  
3 tell her in your phone call?

4           A.       I told her what Jeffrey  
5 Epstein and Ghislaine Maxwell did to  
6 me and the other girls.

7           Q.       Did she give you any money  
8 in exchange for that interview?

9           A.       No.

10          Q.       Did she publish anything  
11 related to that interview?

12          A.       No.

13          Q.       How did you get in touch  
14 with Ms. Callahan?

15          A.       I emailed after I read an  
16 article that she had written about  
17 Jeffrey Epstein, and the last sentence  
18 was -- it was on the 16th of October,  
19 and one of the last sentences I  
20 remember was, will we ever know the  
21 true extent of Jeffrey Epstein's  
22 victims. And I wrote her after that  
23 because, well, it still continues,  
24 doesn't it.

25          Q.       Where is the email that you

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2 wrote her?

3 A. It's on a -- it's on my  
4 computer.

5 Q. Okay. In your Yahoo  
6 account?

7 A. Yes.

8 Q. Did you have any agreement  
9 with her to have any additional  
10 conversation?

11 A. Yes.

12 Q. And what was that agreement?

13 A. It wasn't an agreement per  
14 such. What actually happened was I  
15 came forward. As soon as I came  
16 forward, there was -- where I live in  
17 Barcelona, there's quite a lot -- it's  
18 quite busy traffic with people.

19 I came forward to Maureen  
20 Callahan. I wanted to tell my story,  
21 and I want to run a campaign in which  
22 all the girls that have been abused by  
23 Ghislaine and Jeffrey can come  
24 forward. And I wanted to run a  
25 campaign with the New York Post to get

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1                   HIGHLY CONFIDENTIAL AEO  
2       these girls to have the courage to  
3       come forward, because I know a lot of  
4       them are frightened like myself.

5                   The email correspondence I  
6       had with Maureen Callahan, she was  
7       going away or something and she was  
8       going to write a piece in the New York  
9       Post about my story. During that time  
10      it was the elections, so there was a  
11      lot more other things going on.

12                  There were two people  
13      following me after I came forward to  
14      Maureen Callahan. I went to -- I  
15      walked downstairs. I walked around --  
16      I have a usual routine that I do. In  
17      the morning I went out, I saw the same  
18      two people. Later on that afternoon,  
19      I saw the same two people again. I  
20      was frightened. I'm frightened for my  
21      life, absolutely frightened. So there  
22      you go.

23                  So that's what I was --  
24      communication stopped between Maureen  
25      Callahan and I. I got really angry

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1                   HIGHLY CONFIDENTIAL AEO  
2       with Maureen because she had obviously  
3       told someone.   Being the New York  
4       Post, so, you know.

5           Q.       So you had an email to  
6       Ms. Callahan and an email back from  
7       her?

8           A.       Yes.

9           Q.       More than one?

10          A.       Yes.

11          Q.       How many?

12          A.       I can't remember.

13          Q.       More than ten or less than  
14       ten?

15          A.       Less than ten.

16          Q.       And you had one phone call  
17       with her or more than one?

18          A.       Just one.

19          Q.       And it lasted about 30  
20       minutes?

21          A.       About that.

22          Q.       And was that also on the  
23       cell phone that you got rid of?

24          A.       That was on my partner's  
25       cell phone.



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2 Q. And what had you read in the  
3 press that caused you to get in touch  
4 with Ms. Callahan?

5 MS. MCCAWLEY: Objection to  
6 form. Go ahead.

7 A. You can read the article  
8 yourself. It's on the 16th of  
9 October, there's an article in the New  
10 York Post written by Maureen Callahan.  
11 You can read it. And that's what  
12 inspired me to come forward.

13 Q. What do you recall about  
14 that article?

15 A. Oh, I can't remember. The  
16 one thing I do remember is the last  
17 sentence of the article, which has  
18 stuck with me and quite prominent, and  
19 that is, will we ever know the true  
20 extent of Jeffrey Epstein's victims.

21 Q. Do you recall anything else  
22 about the article?

23 A. It's just the same. When I  
24 read the article, the stuff that I had  
25 experienced myself with Jeffrey, it's

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1                   HIGHLY CONFIDENTIAL AEO  
2       just same old stuff, just continuing.  
3       I thought he had stopped abusing  
4       girls.

5           Q.       What do you recall reading a  
6       article that Jeffrey Epstein was  
7       doing?

8           A.       I can't remember.

9           Q.       Anything at all?

10          A.       You can read the article. I  
11       can't remember.

12          Q.       The question is what you  
13       remember.

14          A.       I can't remember.

15          Q.       You remember nothing else  
16       about the article --

17                   MS. MCCAWLEY: Asked and  
18       answered objection.

19          Q.       -- except it was related to  
20       Jeffrey Epstein and it ended with the  
21       sentence that you've described?

22                   MS. MCCAWLEY: Objection,  
23       asked and answered.

24          A.       Yes.

25          Q.       What do you know about other

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2 girls being frightened?

3 A. I know that the girls on the  
4 island and in New York during my time  
5 with Jeffrey and Ghislaine, that they  
6 were frightened.

7 Q. Okay. What are the names of  
8 those girls?

9 A. Natalya Malyshev. [REDACTED]  
10 -- I don't know her surname. I can't  
11 remember her surname.

12 Q. How do you spell the first  
13 name?

14 A. [REDACTED] -- I'm just taking a  
15 guess, [REDACTED], I'm guessing, I  
16 think.

17 MR. GUIRGUIS: I'm going to  
18 remind the witness I told her not  
19 to speculate, but that's okay.

20 Q. In addition to Natalya  
21 Malyshev and [REDACTED], what are the  
22 names of the other girls who you  
23 believe are frightened?

24 A. Jennifer. There were a  
25 couple other girls I met during my

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2 time with Ghislaine and Jeffrey that  
3 were frightened.

4 Q. What were the names of the  
5 girls that you met that were  
6 frightened?

7 A. There was Jennifer, [REDACTED],  
8 Natalya Malyshev. And there were two  
9 other girls, I can't remember their  
10 names.

11 Q. Okay. Please describe them.

12 A. The -- describe all the  
13 girls or --

14 Q. No. We're talking about the  
15 girls that you met on the island that  
16 you described as frightened.

17 A. Okay. On the island --

18 MR. GUIRGUIS: Objection.

19 You seem to be suggesting that  
20 all those girls are from the  
21 island. I'm not sure that's the  
22 testimony.

23 Q. All right. You said girls  
24 on the island and in New York who are  
25 frightened. I asked you for their

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2       names.

3                   You gave me three, correct?

4       A.       Yes.

5       Q.       You said there were two  
6       others, correct?

7       A.       Mm-hmm.

8       Q.       What did those two other  
9       girls look like?

10      A.       I can't really remember.  
11     One had blonde hair; long, blonde  
12     hair.

13      Q.       Anything else about that?

14      A.       I can't remember.

15      Q.       The other girl, can you  
16     remember her hair color?

17      A.       No, I can't remember.

18      Q.       Do you know the height of  
19     either one of them?

20      A.       No, I can't remember.

21      Q.       Do you have a photograph of  
22     either one of them?

23      A.       No.

24      Q.       And where did you meet these  
25     two other girls?

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1 HIGHLY CONFIDENTIAL AEO

2 A. In New York.

3 Q. Where in New York?

4 A. I can't remember.

5 Q. You don't know the location  
6 at all?

7 A. No. It was ten years ago.

8 Q. Was it in a home or in a  
9 commercial setting?

10 A. I met girls commercially and  
11 in home settings.

12 Q. Where did you meet these two  
13 other girls you described as being  
14 frightened?

15 A. I can't remember.

16 Q. What is Jennifer's last  
17 name?

18 A. I don't know.

19 Q. What does Jennifer look  
20 like?

21 A. She's got long, blonde hair.

22 Q. How long?

23 A. Long, long hair.

24 Q. Longer than your hair now?

25 A. I think so. I think it was

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2 longer.

3 Q. So middle of her back?

4 A. I can't -- I can't remember  
5 on how long her hair is.

6 Q. Where did you meet Jennifer?

7 A. I met Jennifer first in New  
8 York.

9 Q. Where in New York?

10 A. I can't remember.

11 Q. Anywhere in New York? You  
12 can't remember at all?

13 A. I can't remember the  
14 location.

15 Q. Was it at Mr. Epstein's  
16 home?

17 MR. GUIRGUIS: Objection.

18 You have asked her now almost 20  
19 questions about where she met  
20 these girls, and she has  
21 consistently said that she does  
22 not remember.

23 Q. Was it in Mr. Epstein's  
24 home?

25 A. No.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Was it at a club?

3 MR. GUIRGUIS: Are we going  
4 to spend seven hours with her  
5 saying I can't remember where she  
6 met these two girls?

7 Q. Was it at a club?

8 A. One was at a club.

9 Q. Which one?

10 A. Natalya Malyshev.

11 Q. Where did you meet [REDACTED] ?

12 A. I first met [REDACTED] on the  
13 island.

14 Q. Did you meet her a second  
15 time?

16 A. Yes.

17 Q. Where did you meet her the  
18 second time?

19 A. I can't remember.

20 Q. State?

21 A. Can't remember.

22 Q. Country?

23 A. Well, U.S.

24 THE WITNESS: Sorry, can I  
25 have a break? I actually need to



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2 go to the bathroom. Sorry.

3 MS. MENNINGER: Yes, I don't  
4 think I have a question pending.

5 We'll go off the record now.

6 (Time noted: 9:52 a.m.)

7 (Recess.)

8 (Time noted: 10:07 a.m.)

9 Q. So I want to return to your  
10 conversations with Ms. Callahan,  
11 conversation with Ms. Callahan.

12 Did you have any further  
13 communications with her after the  
14 phone call you described?

15 A. There were, I think, a few  
16 emails exchanged, but nothing ever  
17 came about it.

18 Q. And, again, those are emails  
19 from your Yahoo account?

20 A. Yes.

21 Q. Did you ask Ms. Callahan for  
22 compensation in exchange for your  
23 story?

24 MS. MCCAWLEY: Objection,  
25 asked and answered.

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2 A. No.

3 Q. Had you seen any other  
4 stories in the press about Jeffrey  
5 Epstein?

6 A. Through the last ten years,  
7 I've seen a few articles written about  
8 Jeffrey Epstein.

9 Q. What do you recall about  
10 those articles?

11 A. The way he used to abuse  
12 girls. Basically articles written  
13 very similar to my own story -- well,  
14 identical, so...

15 Q. And have you written down  
16 your story?

17 A. No.

18 Q. Nowhere?

19 A. No.

20 Q. Did you see any articles  
21 about Virginia Roberts?

22 A. Yes.

23 Q. Which articles did you see  
24 about Virginia Roberts?

25 A. I can't remember. It was

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2 quite some time ago.

3 Q. What do you recall about it?

4 A. She came forward and I  
5 was -- it was a few years ago that she  
6 came forward, and her story was  
7 exactly the same as mine.

8 I can't remember  
9 specifically what article I read, but  
10 every single article I did read during  
11 the duration of that time, she  
12 experienced the same thing I did.

13 So it was more or less the  
14 same context and it's the same story  
15 in all articles, really.

16 Q. So you were reading these  
17 articles over the course of a period  
18 of ten years, you think?

19 A. Yeah. I didn't pay much  
20 attention to it because I've spent the  
21 last ten years trying to get over that  
22 experience, and I've been frightened  
23 to come forward.

24 Q. And when you read the  
25 articles, you noticed that there were

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1                   HIGHLY CONFIDENTIAL AEO  
2       details that you thought were similar  
3       to your experience?

4                   MS. MCCAWLEY: Objection.

5           A.       They were details that were  
6       exactly the same as what I had  
7       experienced.

8           Q.       Do you know whether anyone  
9       else had brought lawsuits against  
10      Mr. Epstein?

11          A.       No.

12          Q.       Did you save any of these  
13      articles that you read?

14          A.       Sorry, can you repeat that.

15          Q.       Did you save any of the  
16      articles that you read?

17          A.       No.

18          Q.       Where did you grow up?

19          A.       I grew up in South Africa.  
20      I then finished school in Scotland.

21          Q.       When did you move to  
22      Scotland? How old were you?

23          A.       I was 14.

24          Q.       Did your family move to  
25      Scotland or just you?

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2 A. Just myself.

3 Q. Are you a South African  
4 citizen?

5 A. Yes.

6 Q. Do you have a South African  
7 passport?

8 A. Well, yeah. It was stolen.  
9 I'm reapplying for a new one. I have  
10 to renew my South African passport.  
11 It was stolen. South Africa for you.

12 Q. So when did you get that  
13 South African passport?

14 A. I can't remember. I've had  
15 a South African passport my whole  
16 life, so...

17 Q. And when was it stolen?

18 A. I think it was 2014, 2015.

19 Q. So you were born in South  
20 Africa, you're a South African  
21 citizen, and you had a South African  
22 passport your whole life.

23 Have I got that right?

24 A. Mm-hmm.

25 Q. Yes or no?

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2 MR. GUIRGUIS: Objection to  
3 form.

4 You can answer.

5 A. Yes.

6 Q. Did you also have a British  
7 passport?

8 A. Yes.

9 Q. How did that come about?

10 A. My mom's side of the family  
11 is British.

12 Q. And when did you get a  
13 British passport?

14 A. I think when I was about  
15 five.

16 Q. Do you have a dual  
17 citizenship?

18 A. Yes.

19 Q. And do you travel using both  
20 passports?

21 A. It's really complicated. I  
22 only use my South African passport  
23 when I enter into South Africa. So  
24 that's the only time I use my South  
25 African passport, then.

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2 Other than that, I use my  
3 British passport for all other  
4 transportation. Because South Africa  
5 you need, like, a visa; it's really  
6 complicated. So I'm lucky I've got a  
7 British passport.

8 Q. It's easier to travel on a  
9 British passport than a South African  
10 passport?

11 A. Yeah, a lot easier. A lot  
12 easier.

13 Q. All right. Did you have any  
14 siblings growing up?

15 A. Yes.

16 Q. How many?

17 A. I've got one real older  
18 brother and then I've got a half  
19 younger brother and a half younger  
20 sister.

21 Q. Did you all grow up in the  
22 same home?

23 A. No.

24 Q. Who did you grow up in the  
25 same home with? I don't need their

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1                   HIGHLY CONFIDENTIAL AEO  
2       names, but just the people you just  
3       described.

4                   MR. GUIRGUIS: Objection.  
5                   You can answer.

6           A.       I grew up with my mom and my  
7       stepdad, and my brother was just  
8       entering boarding school.

9                   And then I lived with my  
10      auntie and uncle in Scotland.

11      Q.       And cousins?

12      A.       Yeah, and cousins. One  
13      cousin.

14      Q.       And how long did you attend  
15      school in Scotland?

16      A.       About three years.

17      Q.       Did you graduate?

18      A.       Yep, yes.

19      Q.       Is that the equivalent of  
20      our high school?

21      A.       Yeah, it is.

22      Q.       Did you go to college?

23      A.       I went to university to  
24      study psychology and sociology.

25      Q.       Where did you go?



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2 A. Queen Margaret University in  
3 Edinburgh.

4 Q. Did you graduate?

5 A. No, I didn't.

6 Q. Did you go to that college  
7 immediately after graduating from high  
8 school?

9 A. No.

10 Q. When did you go to that  
11 college?

12 A. 2004.

13 Q. And how long did you stay at  
14 Queen Margaret college?

15 A. A year and a half.

16 Q. Why did you leave college?

17 A. I chose the wrong course. I  
18 didn't -- I didn't really agree with  
19 what I was being taught in sociology,  
20 so I quit.

21 Q. During the time you were in  
22 college, did you work?

23 A. Yes.

24 Q. Where did you work?

25 A. I was a waitress at a bar.

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2 Q. Anything else?

3 A. No.

4 Q. Have you ever been married?

5 A. No.

6 Q. Have you ever been engaged?

7 A. Yes.

8 Q. To whom?

9 A. Peter Coulthard.

10 Q. Your current partner?

11 A. Yes.

12 Q. Anyone else?

13 A. Yes, I have.

14 Q. Who else have you been  
15 engaged to?

16 MS. MCCAWLEY: Objection.

17 MR. GUIRGUIS: Objection.

18 A. I don't really see the  
19 relevance in that.

20 Q. Who else have you been  
21 engaged to?

22 A. Andrew Ralph.

23 Q. Was he listed in your  
24 passport?

25 A. Yes.

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2 Q. Anyone else?

3 A. Listed on my passport?

4 Sorry.

5 Q. Have you been engaged to  
6 anyone else?

7 A. Oh, sorry. I've got a  
8 really bad train... No.

9 Q. During what period of time  
10 were you engaged to Andrew Rolph?

11 A. I can't remember.

12 Q. Was it before 2006 or after?

13 A. After.

14 Q. How long after?

15 A. Three years.

16 Q. Did you know Mr. Rolph  
17 during 2006?

18 A. It's Ralph, sorry.

19 R-A-L-P-H.

20 Vaguely, vaguely. We lost  
21 contact.

22 Q. When did you lose contact?

23 A. In 2006.

24 Q. And when did you reestablish  
25 contact?

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2 A. 2008.

3 Q. Do you go by any other  
4 names?

5 A. No.

6 Q. Do you go by SarahEmmaAshley  
7 online?

8 A. I don't think so. I don't  
9 know.

10 Q. On Twitter?

11 A. I don't have any social  
12 media platforms, so I can't remember.

13 Q. Have you ever gone by  
14 SarahEmmaAshley, all one word, on  
15 Twitter?

16 A. I can't remember.

17 Q. Do you have any tattoos?

18 A. Yes.

19 Q. Where?

20 A. One here.

21 Q. Indicating on your arm?

22 A. Indicating on my arm, sorry.  
23 No camera.

24 Yes, I have one, two, three  
25 four.

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2 Q. Where is the second one?

3 A. I've got four.

4 Q. All right. Just tell me  
5 where they are.

6 A. One is on my arm, one is on  
7 my right hip, one's on my upper bikini  
8 line on my right inner thigh, and I've  
9 got one on my left side on my rib  
10 cage.

11 Q. Okay. Have you had them for  
12 a long time?

13 A. I've had -- hang on. Two I  
14 have had for a long time.

15 Q. Which ones are they?

16 A. The scorpion on my right hip  
17 and my Leo symbol on my bikini line.

18 Q. Have you ever obtained a  
19 college degree?

20 A. No.

21 Q. Have you ever gone back to  
22 college?

23 A. I have tried to. I wanted  
24 to.

25 Q. When did you do that?

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2 A. When I moved to New York.

3 Q. In 2006?

4 A. Correct.

5 Q. Any other time?

6 A. Well, recent. I mean, I'm  
7 going back to university next year, so  
8 I'm currently relooking at colleges.  
9 I'm going back to do my psychology  
10 degree.

11 Q. Where?

12 A. I haven't decided yet  
13 because I'm looking for an open degree  
14 -- well, sorry, home learning, so I  
15 haven't found somewhere yet. But I'm  
16 currently going -- well, my aim is to  
17 go back to university and get  
18 qualified.

19 Q. Between 2006 and today, have  
20 you applied to any other colleges?

21 A. No.

22 Oh, yes. Sorry, can you  
23 repeat the question? Sorry.

24 MS. MENNINGER: He can read  
25 it back.

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2 A. Yes. Yes.

3 Q. Okay. When did you apply to  
4 colleges between 2006 and today?

5 A. It was 2006.

6 Q. Is that FIT?

7 A. That's correct.

8 Q. Anywhere else?

9 A. No.

10 Q. Other than working as a  
11 waitress at a bar during college in  
12 2004-2005, what other employment have  
13 you had?

14 A. I have worked in  
15 hospitality. I've worked in  
16 superyachting, those wealthy people  
17 that have superyachts. I used to work  
18 for them. I have done modeling. And  
19 I can't remember any...

20 Q. Did you have a modeling  
21 agent?

22 A. I did in Scotland.

23 Q. In college?

24 A. Mm-hmm, that's correct.

25 Q. Any other time?

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2 A. No.

3 Q. And what type of modeling  
4 was that?

5 A. Just commercial.

6 Q. Print?

7 A. Yep.

8 Q. Runway?

9 A. Yep.

10 Q. TV or ads?

11 A. No.

12 Q. And all in Scotland?

13 A. No.

14 Q. Where else did you model?

15 A. New York.

16 Q. Anywhere else?

17 A. No.

18 Q. London?

19 A. Oh, yeah, I did, sorry. I  
20 did do modeling, a bit of modeling in  
21 London.

22 Q. All right. When did you do  
23 modeling in New York?

24 A. During -- when I first  
25 arrived in New York in 2006.



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2 Q. How much money did you make  
3 as a model?

4 MR. GUIRGUIS: Objection.

5 A. I can't remember.

6 Q. When did you work in  
7 superyachting?

8 A. I can't remember. About  
9 2011. About 2011.

10 Q. And when did you work in  
11 hospitality?

12 A. I've worked in hospitality  
13 my whole life. I've worked in -- I  
14 mean, hospitality, I've either done  
15 bar work, waitressing, superyachting,  
16 yeah.

17 Q. So on and off?

18 A. Yeah, on and off.

19 Q. And since you were an adult?

20 A. And since I was an adult, I  
21 worked in corporate jobs as well.

22 Q. Where did you work in  
23 corporate jobs?

24 A. In South Africa.

25 Q. And just so I understand,

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2 you lived in Scotland from the ages of  
3 14 to 22?

4 A. That's correct.

5 Q. And then where did you move?

6 A. To New York.

7 Q. And how long did you live in  
8 New York?

9 A. About seven, eight months.

10 Q. And where did you move?

11 A. Back in London.

12 Q. And how long did you live in  
13 London?

14 A. Well, I lived in the UK.  
15 Because I moved around a few times, so  
16 I didn't just specifically live in  
17 London. But I was in the UK about  
18 2012.

19 Q. And then where did you move?

20 A. I then went into the  
21 superyachting industry, so I didn't --  
22 I lived on a boat in Italy and south  
23 of France.

24 Q. Did you work for a company?

25 A. I worked for a private

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2 owner.

3 Q. On one yacht?

4 A. On multiple yachts.

5 Q. And what was your job?

6 A. Stewardess -- stewardess,  
7 and then I was a deckhand.

8 Q. With wine?

9 A. Sorry?

10 Q. What's a decant?

11 A. A deckhand.

12 MS. MCCAWLEY: D-E-C-K.

13 THE WITNESS: Sorry.

14 MS. MENNINGER: Oh,  
15 deckhand. I thought you were  
16 decanting wine. It's a pretty  
17 good job.

18 Q. Who is the owner of the  
19 ship?

20 A. I'm not allowed to specify.

21 Q. Do you have a  
22 confidentiality agreement?

23 A. I did sign a confidentiality  
24 agreement when I started employment.

25 Q. And how long were you

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2 employed in superyachting?

3 A. Two and a half years.

4 Q. Okay. And what did you do  
5 after that?

6 A. I moved back to Cape Town.

7 Q. So that was in 2014?

8 A. I can't remember the  
9 specific dates or year.

10 Q. Between 2014 and 2016?

11 A. I've moved 47 times, so I  
12 can't remember.

13 Q. You can't remember what year  
14 you moved back to Cape Town?

15 A. No.

16 Q. Okay. And who did you live  
17 with when you moved back to Cape Town?

18 A. Myself.

19 Q. And how long did you live  
20 there?

21 A. Four years.

22 Q. And you, when did you move  
23 after that?

24 A. December. Yeah, it was  
25 December 2015. Sorry. It was

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2 December 2015.

3 Q. Where did you move?

4 A. I moved from Cape Town to  
5 London.

6 Q. And how long did you live  
7 there?

8 A. Three months.

9 Q. And then where did you move?

10 A. Barcelona.

11 Q. So in March 2016?

12 A. Sorry, no, just hang on.

13 Sorry. I moved to Barcelona around  
14 June, June last year.

15 Q. 2016 June?

16 A. Yeah.

17 Q. You moved to Barcelona?

18 A. Yeah.

19 Q. When you came to the U.S.,  
20 you said that was in 2006?

21 A. Correct.

22 Q. And who did you come with?

23 A. Myself.

24 Q. And who paid for your plane  
25 ticket?

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2 A. Myself.

3 Q. Why did you come?

4 A. I wanted to advance my  
5 career.

6 Q. What year?

7 A. I wanted to go to FIT  
8 university.

9 Q. Did you have a student visa  
10 when you came in 2006?

11 A. No.

12 Q. Had you applied to FIT when  
13 you came to New York in 2006?

14 A. No.

15 Q. Did you have a job when you  
16 came here in 2006?

17 A. No.

18 Q. Where did you stay when you  
19 got here in 2006?

20 A. The Upper East Side.

21 Q. With whom?

22 A. It was just a housemate,  
23 house.

24 Q. What was that person's name?

25 A. Chris.

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2 Q. How do you spell Chris?

3 A. C-H-R-I-S.

4 Q. And what's the last name of  
5 Chris?

6 A. I can't remember.

7 Q. Male or female?

8 A. Male.

9 Q. How old?

10 A. I think he was in his 40s.

11 Q. And how did you meet Chris?

12 A. I met Chris just via -- I  
13 met him when -- why can't I remember?  
14 I think, yeah, I was looking for an  
15 apartment when I got here so it was  
16 just a -- like, we just kind of met on  
17 the Upper East Side and, yeah, I said  
18 I was looking for somewhere to stay.

19 Q. Did you pay rent?

20 A. Yes.

21 Q. How much did you pay?

22 A. I can't remember.

23 Q. A thousand dollars?

24 MR. GUIRGUIS: Objection.

25 A. I think it was less than

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2 that.

3 Q. Did you have your own  
4 bedroom?

5 A. No.

6 Q. Was Chris the only other  
7 occupant?

8 A. There was another guy.

9 Q. Did you share a bed with  
10 anyone at that house?

11 A. With Chris.

12 Q. Were you in a relationship  
13 with Chris?

14 A. No.

15 Q. You slept in a bed with  
16 Chris in the apartment on the Upper  
17 East Side?

18 A. That's correct.

19 Q. What was the address of that  
20 apartment?

21 A. I can't remember.

22 Q. Do you have any way of  
23 reaching Chris now?

24 A. No, no, I don't.

25 Q. Do you know approximately



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2 where in New York it was besides the  
3 Upper East Side?

4 A. I just remember it being in  
5 the Upper East Side. I can't remember  
6 the exact location.

7 Q. Any of the cross-streets?

8 A. I went there the other day,  
9 and it looks -- it looks familiar. I  
10 can't -- I can't remember  
11 specifically.

12 Q. You went to the apartment  
13 the other day?

14 A. No, I didn't go to the  
15 apartment the other day. I went to  
16 the Upper East Side yesterday -- the  
17 other day, sorry. But I can't  
18 remember where the apartment was, no.

19 Q. Was it a walkup or a doorman  
20 or elevator kind of building?

21 A. It was an elevator building.

22 Q. Was there a doorman?

23 A. No.

24 Q. What floor were you on?

25 A. I can't remember.

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2 Q. And you don't remember how  
3 you met Chris?

4 MR. GUIRGUIS: Objection.

5 A. I met loads of people during  
6 that time. I can't specifically  
7 remember how I met every individual.

8 Q. And in the same house, there  
9 was Chris and another guy?

10 A. That's correct.

11 MS. MCCAWLEY: Objection,  
12 misstates --

13 Q. Do you remember the other  
14 guy's name?

15 A. I can't remember.

16 Q. How long did you live with  
17 Chris and the other guy?

18 A. For a -- I think it was a  
19 couple months until I moved.

20 Q. And where did you move?

21 A. To Jeffrey Epstein's  
22 apartment.

23 Q. What was the address to  
24 that?

25 A. I think it was 2000 -

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2 sorry -- 205 East. It was Midtown  
3 somewhere.

4 Q. I'm sorry, what?

5 A. It was sort of Midtown. I'm  
6 not familiar with New York because I  
7 haven't been here and I don't live  
8 here. It was kind of Midtown, his  
9 apartment.

10 Q. Okay.

11 A. If I recall, yeah.

12 Q. So it's 205 East something?

13 A. It's East -- it's East  
14 something. It was the same -- it was  
15 the same apartment building that Nadia  
16 lived in, because we lived in the same  
17 building.

18 Q. Did you live in the same  
19 apartment?

20 A. No.

21 Q. Did you have your own  
22 apartment?

23 A. Yes.

24 Q. How big was the apartment?

25 A. It was massive.

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2 Q. How many bedrooms did it  
3 have?

4 A. I can't remember. I can't  
5 remember. I can't --

6 Q. Two or seven?

7 A. I just -- I remember just  
8 the -- like, the living room, and it  
9 was very spacious.

10 Q. Can you draw a picture of  
11 the layout of it?

12 A. I wouldn't remember the  
13 layout. There was -- I remember like  
14 a pale blue decor.

15 Q. And no one else lived there  
16 with you?

17 A. No.

18 Q. And you don't know how many  
19 bedrooms?

20 A. I can't remember how many  
21 bedrooms there were.

22 Q. Was there a doorman?

23 A. Oh, I can't remember.

24 Q. Was it a walkup or elevator?

25 A. Elevator.

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2 Q. What floor were you on?

3 A. I can't remember.

4 Q. Approximately when did you  
5 move into this apartment?

6 A. It was not long after I  
7 moved in with Chris. About two  
8 months, I think. About two months, I  
9 think, roughly.

10 Q. So you lived with Chris for  
11 about two months and then you moved  
12 into this other apartment?

13 A. That's correct.

14 Q. And how much were you paying  
15 for this new apartment?

16 A. Oh, it was Jeffrey's. I  
17 didn't pay a single thing.

18 Q. And who else lived in the  
19 apartment building?

20 A. Quite a -- gosh. A few,  
21 actually. I recall Nadia.

22 Q. Do you know Nadia's last  
23 name?

24 A. I can't remember her last  
25 name, Nadia's last name.

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2 Q. Okay. Who else?

3 A. There were a few other  
4 girls. I can't remember their names.

5 Q. None of them?

6 A. No. It was a long time ago.

7 Q. What did they look like,  
8 these other names you can't remember?

9 A. I can't remember. There  
10 were so many. There were so many  
11 girls, a constant influx of girls.

12 Q. How many?

13 MS. MCCAWLEY: Objection.

14 A. I can't remember.

15 Q. 50?

16 MR. GUIRGUIS: Objection.

17 A. I can't remember.

18 Q. A hundred?

19 MR. GUIRGUIS: Objection.

20 A. I can't remember.

21 Q. Can you say if it was more  
22 than a thousand or less?

23 MR. GUIRGUIS: Objection.

24 A. I can't remember.

25 Q. You can't remember if it was

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2 more than a thousand?

3 A. I can't remember.

4 MR. GUIRGUIS: Objection.

5 MS. MCCAWLEY: Objection.

6 This is harassing.

7 MR. GUIRGUIS: Objection.

8 We're crossing a line here.

9 MS. MENNINGER: Okay. I'm  
10 asking if she can remember if it  
11 was more than a thousand or less.

12 MS. MCCAWLEY: But you  
13 haven't defined it. You're not  
14 saying where. In the apartment?  
15 In general when she met with  
16 Jeffrey? I mean --

17 MS. MENNINGER: I'm asking  
18 her -- she said there were so  
19 many women that were influx in  
20 the apartment, and I'm asking how  
21 many.

22 MS. MCCAWLEY: She didn't  
23 say in the apartment. Go back  
24 and look at the testimony.

25 THE WITNESS: In the

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2 building.

3 Q. Right. In the building.

4 How many females did you meet in the  
5 building?

6 MR. GUIRGUIS: Objection.

7 A. I can't remember.

8 Q. And can you say it was more  
9 or less than one thousand?

10 MR. GUIRGUIS: Objection.

11 A. It was less than a thousand  
12 girls.

13 Q. Was it less than a hundred?

14 A. Yes, it was less than a  
15 hundred.

16 Q. Was it less than 50?

17 A. I can't remember.

18 Q. Apart from Nadia, can you  
19 name any other one of the females that  
20 you met in the apartment building?

21 MR. GUIRGUIS: Objection.

22 A. I can't remember.

23 Q. Can you describe any of  
24 them?

25 MR. GUIRGUIS: Objection.



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2 A. I can't remember.

3 Q. Did you do any employment  
4 while you were here in the U.S. in the  
5 fall of 2006?

6 MR. GUIRGUIS: Objection.

7 A. I did freelance modeling.

8 Q. Who did you do that for?

9 A. Various photographers.

10 Q. Do you have those  
11 photographs still?

12 A. No.

13 Q. Do you have a portfolio?

14 A. I used to have one.

15 Q. Do you currently have a  
16 modeling portfolio?

17 A. No.

18 Q. Do you have any of your  
19 modeling photos?

20 MS. MCCAWLEY: Objection,  
21 asked and answered.

22 A. Yeah, I got a couple.

23 Q. Where are they?

24 A. At home.

25 Q. In Barcelona?

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2 A. That's correct.

3 Q. Are they on a computer?

4 A. No.

5 Q. When you came to the U.S. in  
6 the fall of 2006, was there a limit on  
7 how long you could stay here?

8 MR. GUIRGUIS: Objection.

9 A. Yes, there was.

10 Q. What was that?

11 A. It was a three-month tourist  
12 visa.

13 Q. Were you permitted to be  
14 employed while you were here on a  
15 tourist visa?

16 MR. GUIRGUIS: Objection.

17 Hold on a second.

18 MS. MENNINGER: I don't know  
19 what kind of visa she was on.  
20 I'm just asking the question.

21 MR. GUIRGUIS: I don't -- I  
22 don't know why her visa status is  
23 relevant or why we're going to  
24 get into things that Mr. Trump  
25 might be interested in, so I'm

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2           not going to have her sit here  
3           and testify about whether she was  
4           complying with immigration law or  
5           not.

6           MS. MENNINGER: Is she  
7           taking the Fifth Amendment?

8           MR. GUIRGUIS: I'm just not  
9           sure that you need to ask the  
10          question.

11          MS. MENNINGER: Well, I did  
12          ask the question. I want to know  
13          if she was permitted, on the type  
14          of visa she came in on the fall  
15          of 2006, to engage in paid  
16          employment.

17          MR. GUIRGUIS: Okay. Now  
18          that I hear the question, you can  
19          answer it if you know the answer.

20          A.       No.

21          Q.       No, you were not permitted  
22          to do paid employment, correct?

23          A.       That's correct.

24          Q.       You did paid employment  
25          while you were here on the tourist

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2 visa, correct?

3 A. I wouldn't quite say -- I  
4 kind of -- I wasn't that great at it,  
5 so I didn't make a lot of money doing  
6 modeling. I was too fat, apparently.  
7 So I wouldn't say I milked the bank  
8 there.

9 (An off-the-record  
10 discussion was held.)

11 A. Milked the bank with my  
12 modeling -- amazing modeling career.

13 Q. So you came over in order to  
14 further your education, I think you  
15 testified to earlier, correct?

16 A. That's correct.

17 Q. So while you were here  
18 during those three months -- was it  
19 three months you said, at first, on  
20 the tourist visa? Correct?

21 A. Yes, yeah.

22 Q. When you were here those  
23 first three months, what did you do to  
24 further your education?

25 A. I started looking at

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2 universities or colleges, researching  
3 what was the right one for me to go  
4 to.

5 By that stage, I -- I've  
6 always been interested in the fashion  
7 industry, designing, clothes  
8 designing. And New York was -- well,  
9 this is the place to be for it.

10 So, yeah, I did quite a lot  
11 of research on which university, what  
12 kind of people were there and  
13 etcetera, so...

14 Q. How were you supporting  
15 yourself while you were living in New  
16 York during the three-month period  
17 after you initially arrived?

18 A. I had some savings.

19 Q. Was your family providing  
20 you any money?

21 A. No.

22 Q. Apart from your savings, was  
23 there any other source of income  
24 during October or so of 2006?

25 A. I did the occasional, I

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2 guess, job where I was called to  
3 entertain or spend time with people,  
4 but that was about it.

5 Q. What does that mean?

6 A. Well, I don't really like to  
7 use the word per se, because you guys  
8 kind of, in your legal minds, have it  
9 in a box of what you think it is.

10 But, like, once or twice, I  
11 was paid to spend dinner with a  
12 gentleman during that time.

13 Q. And how did you meet the  
14 gentleman?

15 A. It was through an agency.

16 Q. What was the name of the  
17 agency?

18 A. I can't remember.

19 Q. Do you know where it was  
20 located?

21 A. No.

22 Q. Do you know how much you  
23 were paid to spend dinner time with a  
24 gentleman?

25 A. It depended how long the

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1 HIGHLY CONFIDENTIAL AEO

2 dinner was for.

3 Q. And what was the most that  
4 you recall making for spending dinner  
5 with a gentleman?

6 A. \$1,500.

7 Q. Did you engage in any sexual  
8 relations with the gentleman?

9 A. One, yeah, once or twice,  
10 but it was on my own accord. It was  
11 after that time period had finished.

12 Q. What time period?

13 A. My appointment, my dinner  
14 with them.

15 Q. Okay.

16 A. He just happened to be  
17 really good looking.

18 MR. GUIRGUIS: It's been  
19 about an hour. Maybe we can take  
20 five minutes, stretch.

21 MS. MENNINGER: Sure.

22 (Time noted: 10:47 a.m.)

23 (Recess.)

24 (Time noted: 11:05 a.m.)

25 Q. Approximately how many times

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1                   HIGHLY CONFIDENTIAL AEO  
2       do you recall being paid to spend  
3       dinner with a gentleman in New York  
4       when you were living here in late  
5       2006?

6           A.       I can't remember.

7           Q.       Ten times?

8                   MR. GUIRGUIS:  Objection.

9           A.       It could be, it wasn't --  
10       yeah, it could be that.  It wasn't  
11       really...

12          Q.       Apart from that income, did  
13       you have any other sources of income?

14                   MR. GUIRGUIS:  I'm sorry.  
15       Off the record for a second.

16                   (An off-the-record  
17       discussion was held.)

18                   MS. MENNINGER:  I think  
19       there's a question pending.

20                   (Requested portion of the  
21       record was read back.)

22          A.       Yes, I did, yes.

23          Q.       What were the other sources?

24          A.       Jeffrey Epstein.

25          Q.       Any other source?



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1 HIGHLY CONFIDENTIAL AEO

2 A. No.

3 Q. Who introduced you to  
4 Jeffrey Epstein?

5 A. Natalya Malyshev.

6 Q. And how did you meet Natalya  
7 Malyshev?

8 A. I met her in a nightclub.

9 Q. Do you know which nightclub?

10 A. I can't remember the exact  
11 name. It was a rock club. The owner  
12 of the club, his name is [REDACTED]. Yeah,  
13 his name -- it's quite a well-known  
14 club. If you Google the name [REDACTED],  
15 you'll find the name. [REDACTED] the  
16 nightclub owner; he's quite famous in  
17 New York.

18 Q. Do you know where in New  
19 York the club is located?

20 A. I can't remember. I don't  
21 know the exact location.

22 Q. Were you there socially or  
23 were you working?

24 A. Socially.

25 Q. And were you with anyone?

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Objection.

3 A. I can't remember. I would  
4 have been with an acquaintance or  
5 something, but I can't remember who I  
6 was with.

7 Q. Were you able to make some  
8 friends with people here in New York  
9 when you moved here?

10 A. Yes. Natalya, Jennifer,  
11 [REDACTED], a girl named Pam. Pam.  
12 There were a few other -- I can't  
13 remember their -- they weren't close  
14 friends, they were just acquaintances.  
15 You don't really make friends in New  
16 York.

17 Q. Tell me about your meeting  
18 of Natalya.

19 A. She was a very attractive  
20 girl, Russian. I think Russian. Very  
21 friendly, very beautiful girl, very --  
22 we clicked immediately.

23 Yeah. She approached me. I  
24 wasn't -- yeah, I didn't go out of my  
25 way to meet any friends in a

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1 HIGHLY CONFIDENTIAL AEO

2 nightclub, so -- especially girls.

3 Q. What do you mean, she  
4 approached you?

5 A. So when I go to a club, I  
6 don't really speak to girls. I speak  
7 to guys. So Natalya approached me and  
8 came on to me.

9 Q. Where were you?

10 A. In the nightclub.

11 Q. Where in the nightclub?

12 A. I can't -- I can't remember  
13 the exact location.

14 Q. Were you at the bar area?  
15 On the dance floor? In the bathroom?

16 A. I would say she pretty much  
17 hit on me everywhere in the club.

18 Q. Was there a dance floor?

19 A. Yes, there was.

20 Q. Was it a one floor club or  
21 two floors?

22 A. I can't remember how many  
23 floors.

24 Q. And what did she do to hit  
25 on you?

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1 HIGHLY CONFIDENTIAL AEO

2 A. She befriended me, she --  
3 yeah, she kissed me.

4 Q. Where did she kiss you?

5 A. On the mouth.

6 Q. Anywhere else?

7 A. Can -- is that in general or  
8 at that --

9 Q. I'm just talking about the  
10 first time you met.

11 A. The first time we met?

12 Q. Right.

13 A. I can't remember if we had  
14 sex the first night we met, but we  
15 definitely were intimate the first  
16 time we met. But I can't remember if  
17 we had had sex on that first night.

18 Q. Okay. Was that consensual  
19 sex?

20 A. Yes, it was with Nataly,  
21 Natalya.

22 Q. And where did you have  
23 consensual sex with Natalya?

24 A. In the club the first time.

25 Q. Where in the club?

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1 HIGHLY CONFIDENTIAL AEO

2 A. In the owner's office.

3 Q. Was the owner present?

4 A. Yes, the owner was present.

5 Q. [REDACTED] [REDACTED] ?

6 A. Is that -- I don't know his  
7 surname, so -- is it -- [REDACTED] -- I can  
8 give you a description of [REDACTED] if you  
9 want.

10 Q. Sure.

11 A. Grayish hair, dark eyes.  
12 Looks a bit like the devil, got a  
13 little goatee. Got kind of like oliv  
14 skin. I've got a photo of myself and  
15 [REDACTED], so...

16 Q. Okay. So you and Natalya  
17 and [REDACTED] had consensual sex in [REDACTED]'s  
18 office?

19 MR. GUIRGUIS: Objection.

20 MS. MCCAWLEY: Objection.

21 Q. Is that right?

22 A. That's correct.

23 Q. Did I get that wrong in any  
24 way?

25 MR. GUIRGUIS: Here's the

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1 HIGHLY CONFIDENTIAL AEO

2 question.

3 A. Yeah, that's correct.

4 Q. Was anyone else present?

5 A. No.

6 Q. Did you have any alcohol  
7 that night?

8 A. I did.

9 Q. How much?

10 A. Not enough to forget or  
11 black out, so not much. I was able to  
12 make decisions.

13 Q. Do you recall what you were  
14 wearing?

15 A. No, I don't.

16 Q. Did you have any cocaine  
17 that night?

18 A. I don't remember.

19 Q. Did you use cocaine during  
20 the fall of 2006?

21 A. Yes, I did.

22 Q. And where did you get that  
23 cocaine?

24 A. From [REDACTED] and Natalya.

25 Q. Anywhere else?

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1 HIGHLY CONFIDENTIAL AEO

2 A. From [REDACTED]'s best friend, a  
3 guy named Peter Lambrakis. I don't  
4 know how to spell that.

5 Q. Anywhere else?

6 A. No.

7 Q. Did you pay for any of the  
8 cocaine?

9 A. No.

10 Q. Did you use any other  
11 controlled substances in the fall of  
12 2006?

13 A. No.

14 Q. Did you take any  
15 prescriptions in the fall of 2006?

16 A. I did.

17 Q. What did you take?

18 A. Jeffrey's psychiatrist  
19 prescribed me lithium, Ritalin, and  
20 there was a bipolar description drug  
21 that was also prescribed to me by  
22 Jeffrey Epstein's psychiatrist. I  
23 can't remember the exact name of that  
24 bipolar drug. But I was started off  
25 with lithium and Ritalin.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.        Okay.  What was the name of  
3 the psychiatrist?

4           A.        I can't remember her name.

5           Q.        It was a woman?

6           A.        It was a woman.

7           Q.        And where was she located?

8           A.        I can't -- I can't remember  
9 the exact location of her office.

10          Q.        Can you describe the office  
11 in any way?

12          A.        I can't remember.

13          Q.        Did anyone go with you?

14          A.        No, I went on my own.

15          Q.        Where did you go to get your  
16 prescriptions filled?

17          A.        A pharmacy near Jeffrey  
18 Epstein's apartment that I was living  
19 in at the time.  I think it was a  
20 Duane Reade.

21          Q.        Were they in your name?

22          A.        Yes, they were.

23          Q.        Were you taking these in the  
24 fall of 2006 or in 2007 or both?

25          A.        Jeffrey first put me in



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1 HIGHLY CONFIDENTIAL AEO

2 touch with his psychiatrist, it was  
3 before -- it was -- yeah, it was well  
4 before December, so it was the fall  
5 of -- fall/winter, going into winter  
6 2006.

7 Q. Do you recall what month you  
8 came to the U.S.?

9 A. It was September 2006.

10 Q. Did you leave and come back  
11 in October?

12 A. I think I may have. I may  
13 have made a trip to London or like a  
14 quick, brief trip.

15 Q. Who paid for that?

16 A. I can't remember.

17 Q. Why did you go back?

18 A. I actually can't even  
19 remember why I went back.

20 Q. So you think you came in  
21 September?

22 A. I know I came in September.

23 Q. And you said you could stay  
24 for three months?

25 A. And then I left the country

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1                   HIGHLY CONFIDENTIAL AEO  
2       briefly for a day and then I came back  
3       in again.

4           Q.       When did you do that?

5           A.       So if you look at my  
6       passport when I entered -- you've got  
7       my passport. So I arrived on the 1st,  
8       I think, of September, and then it was  
9       just before the three months were up,  
10      and then I left.

11                   I think that was the trip  
12      that I made to London in -- October,  
13      November -- October, November -- yeah,  
14      so I was -- I left before the due time  
15      that my tourist visa was up, and I  
16      spent a summer and came back.

17          Q.       Where did you go?

18          A.       I think it was London. I  
19      went to -- I went to London. And then  
20      Jeffrey paid for a flight for me to  
21      visit my family in South Africa in  
22      February.

23          Q.       Okay. So there's two trips  
24      to London we're talking about?  
25      There's one you went and you came

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1 HIGHLY CONFIDENTIAL AEO

2 right back?

3 A. I only recall one trip to  
4 London. I didn't really kind of  
5 catalog every trip I made. I did a  
6 lot of traveling during my time in the  
7 U.S., so...

8 Q. Had you traveled a lot  
9 before you came to the U.S.?

10 A. Yeah. I spent my whole life  
11 traveling.

12 Q. How were you able do that?

13 A. Through savings, through  
14 waitressing jobs, that kind of thing.

15 Q. Did your family ever pay for  
16 you to go on trips?

17 A. No.

18 Q. Never?

19 A. No.

20 Q. Does your family travel?

21 A. Yeah, they travel. They go  
22 on holidays overseas. They go on  
23 holidays.

24 Q. So you said you got a  
25 passport your whole life, I think you

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1 HIGHLY CONFIDENTIAL AEO

2 said, right?

3 A. Well, I can't remember the  
4 specific date when -- I was like from  
5 3 to 5 when I got my passport. I  
6 didn't arrange my passport at 3 years  
7 old; my mom kind of did that.

8 So I've always grown up with  
9 a British and South African passport.  
10 I had dual nationality right from the  
11 get-go.

12 Q. Right. So when you were a  
13 child, did you travel internationally?

14 A. Yeah, I did, to visit my  
15 family in Scotland.

16 Q. And apart from the UK and  
17 South Africa, did you go anywhere as a  
18 child?

19 A. We went on holidays and  
20 Africa. Maybe I went to Scotland to  
21 visit my family, yeah, possibly. I  
22 don't remember.

23 Q. Okay.

24 A. They weren't photo-happy in  
25 my family.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. They were what?

3 A. They weren't photo-happy,  
4 so...

5 Q. So back in the fall 2006,  
6 you were here for three months and  
7 then you left --

8 A. Yeah. I didn't want to go  
9 over my visa and get in trouble, and I  
10 wasn't making much money anyway. And  
11 Jeffrey was with FIT, so he was going  
12 to organize me a visa so I could stay.

13 So I didn't do anything  
14 wrong or illegal with my visa, just to  
15 clarify.

16 Q. I understand. I'm just  
17 trying to get the timing of when you  
18 were here and then you left and then  
19 you came back; is that right?

20 A. So the duration that I was  
21 here, I arrived in September and I  
22 left -- I think it was the 1st of May.

23 So during that time, there  
24 was a trip that I made to South Africa  
25 to visit my family and there was a

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1                   HIGHLY CONFIDENTIAL AEO  
2       trip to London. I don't recall -- I  
3       don't remember any other trips that I  
4       made during that duration of time,  
5       away from Jeffrey and Ghislaine, if  
6       you understand, on my independent own.

7           Q.       Right. So if you came in  
8       September and you could stay for three  
9       months --

10          A.       Mm-hmm.

11          Q.       So you left in December?

12                   MS. MCCAWLEY: Objection,  
13       asked and answered.

14          A.       September, October,  
15       November. Yeah, I did -- I did make a  
16       trip to -- I don't recall the specific  
17       dates, but I did make a trip to London  
18       and I did make a trip to South Africa  
19       in February. So I don't...

20          Q.       Did you go from London to  
21       South Africa?

22          A.       I don't remember the exact  
23       trip itinerary. But, yeah, I flew to  
24       South Africa on a plane.

25          Q.       From London?

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1 HIGHLY CONFIDENTIAL AEO

2 A. From New York.

3 Q. Okay. So you recall having  
4 been on two trips independently  
5 between September 2006 and May 2007,  
6 right? One to London and one to South  
7 Africa?

8 A. Yeah, that's correct.

9 Q. And the one to London, you  
10 recall being a brief trip to then  
11 allow you to stay in the country  
12 longer?

13 A. I don't remember why I went.  
14 I don't even remember the trip, okay?  
15 I really don't recall. I probably  
16 visited my mom or -- or whatever. I  
17 just know that I made two trips during  
18 that duration and I know that I did  
19 not over go the three-month thing. So  
20 I made those for those specific  
21 reasons.

22 Q. Okay.

23 A. But those -- I just wanted  
24 to make clear that those were the only  
25 two trips I made independently without

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1                   HIGHLY CONFIDENTIAL AEO  
2       Jeffrey aiding, and I would like to  
3       make that clear. I made multiple  
4       trips with Jeffrey, so independently I  
5       did those two.

6           Q.       Were any of your trips with  
7       Jeffrey international?

8           A.       No.

9           Q.       Can you tell me when in your  
10       stay in the U.S. you initially met  
11       Natalya?

12          A.       It was pretty soon after I  
13       arrived. I can't remember the exact  
14       time frame. I think it was about  
15       maybe two, three weeks after I  
16       arrived.

17          Q.       Were you living at Chris's?

18          A.       Yes.

19          Q.       Did you consider yourself in  
20       a relationship with Natalya?

21          A.       No, we were just having fun.  
22       And she was -- she was really  
23       friendly, and I didn't know anyone in  
24       New York, so -- and, you know, I  
25       wanted to make friends. She was a



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1 HIGHLY CONFIDENTIAL AEO

2 girl and was just very friendly,  
3 pretty.

4 Q. Was she also involved in the  
5 fashion industry at all?

6 A. I don't recall. I just  
7 recall her working for Jeffrey.

8 Q. What did you observe her  
9 doing for Jeffrey?

10 A. The exact same thing she did  
11 with me. She recruited me and was  
12 paid for it.

13 Q. Okay. Did you see her get  
14 paid?

15 A. No.

16 Q. How do you know she got  
17 paid?

18 A. The girls told me.

19 Q. Who were the girls?

20 A. I can't remember their  
21 names.

22 Q. Okay. So the girls told  
23 you're that Natalya got paid by  
24 Jeffrey?

25 A. That's correct.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. So what did you see Natalya  
3 do for Jeffrey?

4 A. Well, she recruited me. I  
5 think she recruited other girls for  
6 Jeffrey.

7 Q. Did you see her do that?

8 A. No, but I met some of the  
9 other girls that had been introduced  
10 to Jeffrey and Ghislaine via Natalya.

11 Q. Got it.

12 So you were recruited by  
13 Natalya, correct? Yes or no.

14 A. Yes.

15 Q. And you met other girls who  
16 knew Natalya and Jeffrey, correct?

17 A. Well, all the girls knew  
18 each other, really. All the girls  
19 kind of...

20 Q. Are these the same girls  
21 that are in the apartment building or  
22 a different set of girls?

23 A. Different set of girls.

24 Q. Okay.

25 A. You know, there was a

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1                   HIGHLY CONFIDENTIAL AEO

2       constant flow of women, girls.

3           Q.       So where did you see these  
4       other girls?

5           A.       In Manhattan, with Jeffrey,  
6       a few social occasions that we went  
7       on, the island. On the plane, Jeffrey  
8       Epstein's plane. I met girls  
9       everywhere -- every time I went with  
10      Jeffrey. Well, not every time, but he  
11      was always surrounded by new girls. I  
12      couldn't keep up with the names, to be  
13      honest. That's why I can't remember  
14      any of them.

15          Q.       Getting back to Natalya, you  
16      met her at the nightclub?

17          A.       Mm-hmm.

18          Q.       Did she work as a model at  
19      all?

20          A.       I wasn't quite clear what  
21      she actually did, to be honest. I  
22      have absolutely no idea.

23          Q.       Do you know where she lived?

24          A.       No, I didn't. I don't know  
25      where she lives.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did you ever go to her  
3 apartment?

4           A.       No.

5           Q.       When is the last time you  
6 talked to her?

7           A.       I haven't -- I think before  
8 I left New York.

9           Q.       Did you have a cell phone  
10 when you were in New York?

11          A.       Yes, I did.

12          Q.       Do you recall who your cell  
13 phone provider was?

14          A.       I don't remember.

15          Q.       Do you know your cell phone  
16 number?

17          A.       No, I have no idea.

18          Q.       When you were living in New  
19 York, were your parents living in  
20 South Africa?

21          A.       My dad was living in South  
22 Africa, my mom was in the UK.

23          Q.       Can you tell me about your  
24 first conversation with Natalya?

25          A.       I can't remember my first

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1 HIGHLY CONFIDENTIAL AEO

2 conversation with her.

3 Q. Can you remember any  
4 conversation with her?

5 A. Yeah, I can. I can remember  
6 chatting. She was my friend. I mean,  
7 we spoke about everything. We spoke  
8 about life with Jeffrey, we spoke  
9 about Ghislaine, we spoke about the  
10 other girls, we spoke about Jen. Jen  
11 was a really nice girl as well. Like,  
12 we often got coffee with each other,  
13 lunches, dinners.

14 Q. Okay. Do you remember any  
15 specifics of your conversations?

16 MS. MCCAWLEY: Objection,  
17 asked and answered.

18 A. We spoke very frequently  
19 about the faces Jeffrey used to pull  
20 when he used to masturbate over the  
21 girls, which was quite funny.

22 We spoke about Ghislaine  
23 quite a lot and what a monster she  
24 was. She's really not a nice person,  
25 so -- yeah, I mean, we spoke about

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1 HIGHLY CONFIDENTIAL AEO

2 them a lot, actually.

3 Q. Okay. So you spoke about  
4 the faces Jeffrey made when he  
5 masturbates over the girls?

6 A. And the way he spits on his  
7 hand when he masturbates. It's really  
8 gross. It's quite funny.

9 Q. Any other conversations with  
10 Natalya that you remember?

11 A. I remember I didn't really  
12 get on with Ghislaine. As I said,  
13 she's -- in my opinion, she's not a  
14 nice person. I didn't really get her.

15 And Jeffrey Epstein promised  
16 me a -- going to FIT. So we  
17 frequently spoke about just everyday  
18 things, you know.

19 Natalya and I -- Natalya  
20 really -- Jeffrey Epstein and I once  
21 had a fight and Natalya patched things  
22 up between us, because I didn't want  
23 to speak to Jeffrey anymore.

24 I often spoke to Natalya  
25 about why Ghislaine didn't like me and

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1                   HIGHLY CONFIDENTIAL AEO  
2       why the other girls didn't like me:  
3       Nadia didn't like me, Ghislaine didn't  
4       like me, Sarah Kellen definitely  
5       didn't like me. Yeah, that kind of  
6       stuff.

7           Q.       How is it that you came to  
8       meet Jeffrey Epstein?

9           A.       Through Natalya.

10          Q.       Tell me about that.

11          A.       I first met Jeffrey --  
12       Natalya introduced me to Jeffrey. She  
13       kind of described him to me. She knew  
14       I wanted to go back to school to get a  
15       degree, and I was really battling  
16       financially because at that time I  
17       wasn't really modeling material.

18                   So, yeah, she told me about  
19       this guy who was really wealthy, a  
20       philanthropist, you know, really  
21       enjoyed -- you know, he really cares  
22       about people and he really wants to  
23       help them, and he was a really good,  
24       decent guy.

25                   Then we -- he was helping

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1 HIGHLY CONFIDENTIAL AEO

2 her at that time, as well as Jen and  
3 other girls.

4 Q. That's what she told you?

5 A. Yes.

6 Q. Where were you when Natalya  
7 was describing Jeffrey?

8 A. I can't remember the  
9 location, but -- I mean, she first  
10 described Jeffrey -- I think it was  
11 the second time we met, because I had  
12 discussed with her that I was  
13 struggling financially because my  
14 modeling career hadn't really taken  
15 off as I had hoped, so I was -- yeah,  
16 she wanted to help.

17 Q. And you don't remember where  
18 you had this conversation?

19 A. No, not specifically the  
20 exact location.

21 Q. Was it in person or over the  
22 phone?

23 A. It was in person.

24 Q. Was anybody else there?

25 A. I think [REDACTED] could have been



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1                   HIGHLY CONFIDENTIAL AEO  
2           there, Peter Lambrakis could have been  
3           there, a few other people could have  
4           been there. Various people. She was  
5           quite open about it.

6           Q.       And do you know when this  
7           was in the fall of 2006?

8           A.       It was very close to after I  
9           had first arrived, so it was quite  
10          soon after I arrived. I don't know  
11          specifically if it was three weeks or  
12          two weeks, but it was quite soon after  
13          I first got to...

14          Q.       Okay. So did you meet  
15          Jeffrey? Did you agree to meet  
16          Jeffrey? What happened next?

17                   MR. GUIRGUIS: Objection to  
18          form.

19          Q.       What happened next?

20                   MR. GUIRGUIS: Objection to  
21          that one too.

22          A.       I agreed to -- yeah, I met  
23          Jeffrey.

24          Q.       How?

25          A.       We went to -- the first

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1                   HIGHLY CONFIDENTIAL AEO

2       meeting I had with Jeffrey was at the  
3       cinema. There were about ten other  
4       girls with him.

5           Q.       How did that meeting get  
6       arranged?

7           A.       Natalya arranged it, and  
8       said she had spoken to Jeffrey and  
9       Jeffrey wanted to meet me.

10          Q.       And what movie did you see?

11          A.       I can't remember what movie  
12       it was.

13          Q.       Did you sit with him?

14          A.       Yes, I did.

15          Q.       Next to him?

16          A.       I can't remember if it was  
17       next to him, but I was close by him.

18          Q.       You, Natalya, ten other  
19       girls and Jeffrey?

20          A.       I don't know if it was  
21       exactly ten, but there were -- there  
22       were many other girls there. There  
23       was like a big group of us.

24          Q.       And where was the theater?

25          A.       I can't remember the exact

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1                   HIGHLY CONFIDENTIAL AEO  
2       location, but it was quite a  
3       prominent -- it was a big cinema. It  
4       was like a huge -- like one of your  
5       main cinemas. Somewhere -- is there a  
6       cinema on Lexington, maybe?

7                   I don't know. Sorry.  
8       Navigation isn't in my strong points.  
9       I'm going to stop speculating. I'm  
10      sorry, okay? I said it for you. I  
11      don't know.

12            Q.       It was somewhere in New  
13      York?

14            A.       It was in New York.

15            Q.       And you went with Natalya?

16            A.       Yes.

17            Q.       How did you go?

18            A.       By cab.

19            Q.       From your apartment with  
20      Chris?

21            A.       Yes.

22            Q.       And tell me about your  
23      experience at the cinema?

24            A.       I bought popcorn and sweets  
25      and juice, and I had an awesome time

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1                   HIGHLY CONFIDENTIAL AEO  
2       watching the movie with a bunch of new  
3       people.

4           Q.       And you do not remember the  
5       name of the movie?

6           MR. GUIRGUIS:   Objection.

7           A.       No.

8           Q.       And what happened after the  
9       movie was over?

10          MR. GUIRGUIS:   Objection.

11          A.       I got in a taxi.

12          Q.       And?

13          MR. GUIRGUIS:   Objection.

14          MS. MENNINGER:   What's the  
15       objection?

16          MR. GUIRGUIS:   The question  
17       and, objection to form.   That's a  
18       good objection.

19          A.       I went home.

20          Q.       When was the next time you  
21       met Jeffrey?

22          A.       I can't remember specific --  
23       I can't remember -- I think I met  
24       him -- again, I'm not trying to  
25       speculate.   I think I met him in New

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1 HIGHLY CONFIDENTIAL AEO

2 York again. I can't remember that  
3 meeting. I then met him again on his  
4 private plane.

5 Q. So you believe the third  
6 time you met him was on the private  
7 plane?

8 A. That's correct.

9 Q. And do you remember anything  
10 about the second time you met him?

11 A. No, I can't remember.

12 Q. And do you know how long  
13 after the first time you met him the  
14 second time was?

15 A. Pretty soon after.

16 Q. What does that mean to you?

17 A. Couple days.

18 Q. Where did you meet him that  
19 second time?

20 A. In New York.

21 Q. Where?

22 A. I can't remember.

23 Q. At his house?

24 A. No, it wasn't at his house.

25 Q. Was anyone else there the

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1 HIGHLY CONFIDENTIAL AEO

2 second time you met him?

3 A. Natalya.

4 Q. Anyone else?

5 A. No, not that I recall.

6 Q. Anything memorable about  
7 that event?

8 A. Nothing, nothing memorable.

9 Q. Anything sexual happen at  
10 the second meeting?

11 A. No.

12 Q. At the first meeting?

13 A. No.

14 Q. How did the flight meeting  
15 become arranged, if you know?

16 A. So it was pretty a  
17 last-minute thing. Natalya phoned me  
18 up and said that Jeffrey Epstein would  
19 very much like to have me go to his  
20 island. It was going to be so much  
21 fun, it was going to be a girls' week,  
22 there were lots of other girls going,  
23 we were going to have so much fun,  
24 etcetera, etcetera, etcetera.

25 Q. And what did you do?

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Objection.

3 A. I went on the -- I went with  
4 them to the island.

5 Q. Where was the plane located?

6 A. I can't remember the exact  
7 airport. I think it was either Newark  
8 or JFK.

9 Q. Did you fly commercially or  
10 private?

11 A. Private.

12 Q. Was it Jeffrey's plane?

13 A. Yes.

14 Q. Who else was on the plane?

15 A. Nadia, Natalya -- I would  
16 like to say Jen, but I can't remember  
17 her specifically being there on the  
18 first trip, so... Natalya and Nadia  
19 were definitely there.

20 Q. Had you met Nadia before?

21 A. No.

22 Q. And you don't remember  
23 anyone else?

24 A. No, it was -- I mean, there  
25 were always new people around Jeffrey

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1 HIGHLY CONFIDENTIAL AEO

2 and Ghislaine, so I don't really --

3 Q. Well, you just said and  
4 Ghislaine. Was Ghislaine there?

5 A. No, not the first time.

6 Q. And do you recall what month  
7 this was?

8 A. I can't remember what month  
9 it was.

10 Q. It was sometime during your  
11 first three-month period?

12 A. Yeah, it was within that  
13 first three months.

14 Q. So sometime between  
15 September and December?

16 A. That's correct.

17 Q. And did you have a camera  
18 with you when you went?

19 A. I did.

20 Q. Did you take pictures?

21 A. I took a couple.

22 Q. Describe for me what  
23 happened on the plane ride?

24 A. Nadia walked in, sat down in  
25 front of me, Nataly. We all buckled



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1                   HIGHLY CONFIDENTIAL AEO

2       up, we took off.

3                   The rest of the passengers  
4       in the -- I think it's towards the  
5       front of the plane where all the seats  
6       are -- we all -- all the guests  
7       were -- fell asleep. I pretended to  
8       be asleep.

9                   Jeffrey then went -- Jeffrey  
10       went to his -- was in his bed on the  
11       plane, having open sex with Nadia for  
12       everyone to see, on display.

13            Q.       Did you participate in that  
14       sex at all?

15            A.       No, I didn't.

16            Q.       Did anyone ask you to?

17            A.       No.

18            Q.       Did you and Natalya have any  
19       sexual relationship on that plane, the  
20       first plane ride?

21            A.       No.

22            Q.       Were you still having an  
23       occasional sexual relationship with  
24       Natalya at that time?

25                   MS. MCCAWLEY: Objection.

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1 HIGHLY CONFIDENTIAL AEO

2 A. I can't remember.

3 Q. What types of sexual  
4 relationship did Jeffrey and Nadia  
5 have on the plane in your presence?

6 A. Well, Nadia was straddling  
7 Jeffrey for quite some time. I  
8 watched them both ejaculate with each  
9 other. They were having quite a good  
10 time together.

11 Q. How long was the plane ride?

12 A. Gosh, a few hours. Few  
13 hours.

14 Q. Did you say anything?

15 A. No. I was a guest. I  
16 thought it would be quite  
17 inappropriate.

18 Q. All right. Can if I ask you  
19 if you could just draw a layout of the  
20 plane?

21 I'm going to reach over?

22 Just kind of describe where  
23 everyone was sitting and the bed area.

24 A. I don't remember if it was  
25 the back or front. The front of the

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1                   HIGHLY CONFIDENTIAL AEO

2       plane, I think there was a round --  
3       there was, like, a round bed at the  
4       back of the plane.

5                   There was seating. Pilots  
6       are there. Nadia walked in with her  
7       Louis Vuitton handbag. She sat there  
8       in front of me at the side of the  
9       plane. So there was seating here.

10       Q.       Can you just write Nadia  
11       next to that --

12       A.       Okay.

13       Q.       -- so I will remember later.

14       A.       Nadia sat there when she  
15       first walked in. And I remember her  
16       specifically with a Louis Vuitton  
17       handbag that she had, a black one.

18       Q.       Okay. And where were you  
19       sitting?

20       A.       I was sitting opposite her.  
21       And then I think we changed positions  
22       or there was -- I just remember at the  
23       front, there was seating here, okay.

24       Q.       Well, where was Natalya  
25       sitting?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I don't remember where she  
3 was sitting.

4 Q. Can you just put where the  
5 other seats were, if you don't  
6 remember who was in them?

7 A. I remember there was seating  
8 here. I think there was -- I'm  
9 speculating here, but I can't remember  
10 if they were sitting on the -- on the  
11 other side of the plane. I can't -- I  
12 just remember that I sat on a seat in  
13 the front of the plane and there were  
14 people opposite me.

15 Q. When you say opposite, do  
16 you mean in front and back of you or  
17 are you saying to your sides?

18 A. In front of me.

19 Q. Okay.

20 A. So it's like a seating --

21 Q. Is it one seat in a row?

22 A. I can't remember the  
23 specific layout of the seating on the  
24 aircraft, but I know that there's a  
25 big, fat, round open -- there's a bed

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1 HIGHLY CONFIDENTIAL AEO

2 on the back of the plane --

3 Q. Okay.

4 A. -- which there's no door, so  
5 you can quite easily have sex and show  
6 the whole plane. Which is how it's  
7 designed, I'm guessing.

8 Q. Okay.

9 A. Because there's no privacy  
10 around the bed.

11 Q. I understand.

12 Can you just draw where the  
13 other seats are, though?

14 MS. MCCAWLEY: Objection,  
15 asked and answered.

16 A. I don't remember where the  
17 other seats are. I remember me  
18 sitting in a specific airplane seat at  
19 the beginning, you know, at the front  
20 of the plane. I don't remember the  
21 decor of the plane. I remember there  
22 was a bed. It was open, it was open  
23 plan.

24 Q. Were there bathrooms on the  
25 plane?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Yes.

3 Q. Where were they?

4 A. I can't remember where the  
5 bathrooms were located on the  
6 aircraft.

7 Q. Do you know what kind of  
8 plane it was?

9 A. It was a nice, big plane.  
10 Yeah, it was a plane. A plane.

11 Q. Had you been on a private  
12 plane before?

13 A. No.

14 Q. Do you know how many people  
15 it carried?

16 A. I just know it's a plane.

17 MS. MENNINGER: Can we mark  
18 that. Can you mark that as  
19 Defendant's Exhibit 1.

20 MR. GUIRGUIS: Have you seen  
21 it before you want to mark it?

22 THE WITNESS: It's really  
23 bad. Do you want me to redraw  
24 that? It's really embarrassing.  
25 I'm not an artist or anything.

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1 HIGHLY CONFIDENTIAL AEO

2 It's really bad.

3 MR. GUIRGUIS: Just hand it  
4 over.

5 (Defendant's Exhibit 1,  
6 hand-drawn picture marked for  
7 identification.)

8 Q. Was there a kitchen on the  
9 plane that you recall?

10 A. I can't remember any, no.

11 Q. Was there an office area?

12 A. I can't remember the layout  
13 of the plane. I remember the bed.  
14 The only thing I remember is the  
15 open-plan bed where I watched Nadia  
16 and Jeffrey have sex.

17 Q. Apart from the Louis Vuitton  
18 bag, do you remember what Nadia was  
19 wearing?

20 A. I just remember she had a  
21 black Louis Vuitton handbag. And I  
22 don't remember what she was wearing,  
23 no. But I remember the black handbag  
24 because I liked it so much, I bought  
25 the red-colored version a few years

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1                   HIGHLY CONFIDENTIAL AEO

2       later.    It was really nice.

3           Q.       How long did you stay on the  
4       island during this first trip?

5           A.       A few days.

6           Q.       Was it a week or two days?

7           A.       I can't remember.

8           Q.       Apart from Nadia, Natalya,  
9       Jeffrey and yourself, is there anyone  
10       else you recall being on that first  
11       trip?

12                   MR. GUIRGUIS:  Objection.

13           A.       On that particular first  
14       trip, I can't remember.  I just  
15       remember Nadia, Natalya, Jeffrey,  
16       myself on the first trip.

17           Q.       When you got to the island,  
18       was there anyone there?

19           A.       Yes.  There was a lovely  
20       couple from Zimbabwe, somewhere in  
21       Africa.  I think they were either  
22       South African or from Zimbabwe, but  
23       they was a lovely middle-age couple.  
24       Chef, like staff, really nice staff on  
25       the island.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. Any other guests?

3 A. No, not that first trip.

4 Q. Did you engage in any sexual  
5 acts with Jeffrey Epstein on your  
6 first trip?

7 A. Yes.

8 Q. What happened?

9 MR. GUIRGUIS: Objection.

10 A. It was -- I had to give him  
11 a massage in his bedroom.

12 Q. And how did that come about?

13 A. So the entire basics were  
14 explained to me, there's this wealthy  
15 dude, this philanthropist, loves  
16 women, loves getting massages. And  
17 this was a nice way to make extra  
18 cash, which is great.

19 I got to the island -- oh, I  
20 was made to massage Jeffrey on the  
21 plane. Sorry. That's where I gave my  
22 first massage to Jeffrey.

23 So my first massage started  
24 with him on the plane, with his feet  
25 and his hands. And on that trip I

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1                   HIGHLY CONFIDENTIAL AEO  
2           was -- I had to give him other  
3           massages, like legs, arms, feet,  
4           hands, head, shoulders. And it wasn't  
5           straight away, but they got more  
6           sexual. Then I was called to his  
7           bedroom.

8           Q.        Okay. I just want to make  
9           sure we're talking about the same time  
10          frame.

11                    There was a massage you gave  
12          on the plane on the way down there?

13          A.        Yes.

14          Q.        That was not sexual?

15          A.        That was not sexual, no.

16          Q.        Was that before or after he  
17          was having sex with Nadia in the open  
18          bed in the plane area?

19          A.        It was before. It was  
20          before they had sex, because we all  
21          fell asleep.

22          Q.        Okay. And then how did the  
23          massage come about?

24          A.        On the island or --

25          Q.        No, on the plane. Just on

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1 HIGHLY CONFIDENTIAL AEO

2 the plane.

3 A. Jeffrey asked me to massage  
4 him.

5 Q. So you were asleep and  
6 Jeffrey woke you up?

7 MS. MCCAWLEY: Objection.

8 A. When we first got on the  
9 plane, we sat down. You know, like  
10 when you first get on an airplane, you  
11 settle in and chat, chat, chat. And I  
12 massaged him, and then it was after  
13 that we find of all fell asleep. And  
14 then I woke up and I saw Jeffrey and  
15 Nadia.

16 Q. Okay.

17 A. So in that effect, I was  
18 probably sitting -- I was facing the  
19 bed.

20 Q. You were rear-facing?

21 A. Yeah.

22 Q. Can I just hand you back  
23 Defendant's Exhibit 1. Is it still,  
24 in your recollection, the same place?

25 A. Yeah. We switched seats a

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1 HIGHLY CONFIDENTIAL AEO

2 few times.

3 Q. So where was Jeffrey when  
4 you gave him the massage on the  
5 airplane?

6 A. He was -- he was seated at  
7 the front.

8 Q. In front of where you were?

9 A. We weren't really all seated  
10 throughout the entire duration of the  
11 flight. So as soon as the flight took  
12 up, we took our seat belts off and  
13 kind of moved around freely, because  
14 it's not a commercial flight. You can  
15 do that on private planes. So we  
16 weren't in our seats the whole time.  
17 There was a lot of moving around.

18 Q. Okay. Can you just draw on  
19 Defendant's Exhibit 1 where he was  
20 when you gave him the massage?

21 A. I can't remember where  
22 specifically on what seat or where I  
23 was facing that I gave Jeffrey his  
24 massage, so I'm not comfortable  
25 putting something because that's

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1                   HIGHLY CONFIDENTIAL AEO

2       speculating.

3           Q.       Do you have a general area  
4       at all?   Was it in the front area?

5           A.       The general area -- the  
6       general area here is at the front of  
7       the plane, and then the bed at the  
8       back of the plane.

9           Q.       So which of those two  
10       general areas was the massage?

11          A.       So the massage was at the  
12       front, because I didn't give him it on  
13       the bed; it was in the front of the  
14       plane. I don't remember what specific  
15       seat plan I gave him a massage.

16          Q.       Was he wearing clothes?

17          A.       Yes.

18          Q.       During the whole massage?

19          A.       During the whole massage,  
20       yes.

21          Q.       What was he wearing?

22          A.       I don't remember.

23          Q.       Did he have on shoes?

24          A.       Yes, he had on shoes when he  
25       walked onto the plane. But then he

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1                   HIGHLY CONFIDENTIAL AEO

2       took his shoes off to have the  
3       massage.

4           Q.       And do you recall what he  
5       said when he asked you to give him a  
6       massage?

7           A.       Yes.   He asked me to massage  
8       his feet and massage him.

9           Q.       Were you surprised by that  
10       request?

11          A.       No.

12          Q.       Why not?

13          A.       Because Natalya told me that  
14       he liked getting massages from girls  
15       and that he paid for them.

16          Q.       Did he pay you for that  
17       massage on the plane?

18          A.       No.

19          Q.       Did you expect him to?

20          A.       Well it was a -- it was the  
21       beginning of the trip, so I'm hardly  
22       going to go, I don't really know you.  
23       Can you please pay me.   It's not  
24       something you really discuss, I don't  
25       think.   It's not really appropriate.

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1                   HIGHLY CONFIDENTIAL AEO

2       It's not very businesslike.

3           Q.       And you were clothed during  
4       the massage on the plane?

5           A.       Yes.

6           Q.       Where was the second  
7       massage?

8           A.       On his island.

9           Q.       Where on the island?

10          A.       So the second time I  
11       massaged him was probably on -- it  
12       was -- I was then asked to massage him  
13       again later that day, to massage him  
14       again in the open-planned seating area  
15       on the island.

16          Q.       Who asked you to do that?

17          A.       Sarah Kellen.

18          Q.       So Sarah Kellen was on the  
19       island?

20          A.       Yes.

21          Q.       Did she travel with you?

22          A.       Not all -- I can't remember  
23       specifically who traveling -- I can't  
24       say that I a hundred percent remember  
25       her there on that first flight. I

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1                   HIGHLY CONFIDENTIAL AEO  
2       don't -- I can't visually see her  
3       there. But I know that she traveled  
4       with us pretty much every time with  
5       Jeffrey. She traveled everywhere with  
6       Jeffrey.

7           Q.       How many times did you go to  
8       the island?

9           A.       Several.

10          Q.       How many?

11          A.       Several. Several times.

12       There were multiple occasions that I  
13       went to the island.

14          Q.       Three times?

15          A.       Several. Several. I can't  
16       remember how many times specifically.

17          Q.       I understand you don't have  
18       a specific answer.

19          A.       Yeah.

20          Q.       Do you believe it was more  
21       than ten times?

22          A.       I don't think it was as much  
23       as ten times, no. Maybe a little bit  
24       less, but not that many.

25          Q.       Do you know how many times



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1                   HIGHLY CONFIDENTIAL AEO  
2       you went on the private plane versus a  
3       commercial plane?

4           A.       I flew both, so I can't  
5       remember how many times I did  
6       commercial, how many times I did  
7       private. I mean, it was -- I know  
8       that I did fly commercially at some  
9       times when the plane wasn't available.

10          Q.       And the total number of  
11       trips to the island you think was less  
12       than ten times?

13                   MR. GUIRGUIS: Objection.

14          A.       There was several times.  
15       I'm not sure if it was more than ten.  
16       I don't know the accurate number. It  
17       was several times.

18          Q.       Did you go through any type  
19       of passport control when you went to  
20       the island at all?

21          A.       No, they didn't check  
22       passports.

23          Q.       How did you get from where  
24       the plane landed to the island?

25          A.       Jeffrey's speedboat.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Was that the only method?

3 A. Also a helicopter.

4 Q. Who flew the helicopter?

5 A. I don't -- a guy.

6 Q. Was he cute?

7 MR. GUIRGUIS: Objection.

8 A. I don't remember.

9 MR. GUIRGUIS: Objection,  
10 and I direct the witness not to  
11 answer.

12 MS. MENNINGER: I'm learning  
13 about superyachting. I thought I  
14 would find out about the  
15 helicopter.

16 MR. GUIRGUIS: I thought you  
17 were going to ask if he was  
18 taller than 6 feet or less than 6  
19 feet. I thought that was the  
20 next series of questions.

21 Q. So you said the second  
22 message you gave Jeffrey was on the  
23 island the same day you flew down  
24 there the first time?

25 A. Yes.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And it was in the open-plan  
3 area?

4           A.       Yes.

5           Q.       And you recall Sarah Kellen  
6 being the one to ask you to give the  
7 message?

8           A.       We were all sitting there  
9 socially. Jeffrey asked me. And that  
10 wasn't a sexual massage in the seating  
11 area on the island, the second  
12 massage. He was still training me to  
13 massage, so my standards weren't quite  
14 high enough.

15          Q.       How did he train you to  
16 massage him?

17          A.       He let the girls massage me  
18 in front of him. He showed me how  
19 to -- because his body's full of  
20 knots, so -- and he likes his massage  
21 really hard. So when you really push  
22 on those knots that he has, you have  
23 to be quite firm with him.

24          Q.       So he told you what he  
25 liked?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Yes, yeah. And some of the  
3 other girls -- sorry. Natalya showed  
4 me how he like his massages.

5 Q. Was he clothed during the  
6 second massage?

7 A. Yes.

8 Q. Were you clothed?

9 A. Yes.

10 Q. Did any sexual contact occur  
11 on the second massage?

12 A. No.

13 Q. When do you recall there  
14 being a third massage?

15 A. The next day.

16 Q. And what happened that gave  
17 rise to the third massage?

18 A. I was called to Jeffrey's  
19 bedroom to massage him.

20 Q. Who called you?

21 A. I'm -- I don't want to  
22 speculate, so I can't remember  
23 specifically who called me.

24 Q. Okay. So some third person  
25 you don't recall --

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1 HIGHLY CONFIDENTIAL AEO

2 A. It was a female. It was  
3 either Sarah Kellen or Natalya, so I  
4 can't remember which of the two that  
5 called me, because they called me many  
6 times during the duration of my trip.

7 Q. So when you say called me,  
8 what does that mean?

9 A. They come up to me and say,  
10 please go to Jeffrey's bedroom and  
11 massage Jeffrey. He is waiting for  
12 you.

13 Q. What time of day was it?

14 A. I think it was -- I can't  
15 remember what specific time of day it  
16 was.

17 Q. Can you kind of describe the  
18 island for me. Were there more than  
19 one building on it?

20 A. Yeah, there were multiple  
21 buildings. You had the main house.  
22 You had certain accommodation areas  
23 where the girls sit.

24 There were various buildings  
25 around the island where he used to

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1                   HIGHLY CONFIDENTIAL AEO  
2       have all -- him and his other guests,  
3       like beds and beds, like little  
4       shelter things where him and his  
5       guests used to have sex with the  
6       girls, like beds set up for instant  
7       sexual entertainment. So --

8           Q.       On a beach area?

9           A.       All over the island. All  
10       over the island. So if you go on one  
11       of his quad bikes and do a tour of his  
12       island, which I'm sure you guys have  
13       done, you will see multiple buildings  
14       around the island.

15          Q.       And where were you staying  
16       during this first trip?

17          A.       I was staying in one of the  
18       guest houses that Natalya -- the main  
19       guest house that all the girls shared.

20          Q.       Were you staying in your own  
21       room?

22          A.       No.

23          Q.       Who were you sharing a room  
24       with?

25          A.       Natalya. I think Nadia

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1                   HIGHLY CONFIDENTIAL AEO  
2       slept in the bungalow; she didn't stay  
3       there per se. She was explained to be  
4       Jeffrey Epstein's girlfriend at the  
5       time.

6           Q.       When you were asked to give  
7       Jeffrey a massage on the third  
8       occasion by a female, do you recall  
9       what words were used?

10          A.       I can't remember the exact  
11       words, no. But I was -- it was  
12       generally -- it was, can you please go  
13       and give Jeffrey -- it's kind of like  
14       your turn type of thing.

15          Q.       Did you know where his  
16       bedroom was?

17          A.       I was shown to his bedroom.

18          Q.       Who showed you to his  
19       bedroom?

20          A.       I can't remember who showed  
21       me to his bedroom.

22          Q.       All right. Tell me what  
23       happened during the third massage?

24          A.       So I went into Jeffrey  
25       Epstein's bedroom. His bedroom is

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1                   HIGHLY CONFIDENTIAL AEO  
2     ice-cold; it's always ice-cold. He  
3     likes his bedrooms very well air  
4     conditioned.

5                   There was a massage table  
6     laid out in his bedroom. He asked me  
7     to undress and that he wanted to give  
8     me a massage, and he asked me to lay  
9     on the table. He then started  
10    touching my body.

11                  I was -- I was -- it didn't  
12    start off as a sexual massage; it was  
13    just -- you know, it was just doing a  
14    normal massage, and then he started to  
15    touch me. He touched my vaginal  
16    region and he touched me all over.

17           Q.       Were you draped with a  
18    towel?

19           A.       No.

20           Q.       For no part of the massage?

21           A.       For the -- I can't remember.

22           Q.       Was anyone else present in  
23    the room?

24           A.       No.

25           Q.       And after he started



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1                   HIGHLY CONFIDENTIAL AEO  
2           touching you while you were on the  
3           table, did you give him a massage?

4           A.        I can't remember the  
5           specific sequence of events, but I  
6           remember the third massage, it wasn't  
7           for Jeffrey; it was for me. He  
8           performed the massage on me.

9           Q.        Did you tell him to stop?

10          A.        No, I didn't.

11          Q.        Did you have any sexual  
12          contact with him?

13          A.        No, he just touched me. And  
14          he was touching himself too, so...

15          Q.        Did you have an orgasm?

16          A.        I did have an orgasm. He  
17          used a specific vibrator on me, which  
18          it was quite hard not to.

19          Q.        Can you describe it?

20          A.        Yeah. It's quite big. It's  
21          not an actual vibrator. It's really  
22          good; you should get one if you don't.

23                    THE WITNESS: Sorry. I'm  
24                    allowed to talk. Okay. Sorry.

25          A.        It's -- I'll -- can I draw

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1                   HIGHLY CONFIDENTIAL AEO  
2       it? Can I draw it? I'll draw you the  
3       exact -- I can actually get you -- I  
4       actually own one, so I can get you a  
5       photo of it, you know. It's also in  
6       the pictures in the dentist chair, in  
7       one of the photos, so...

8                   It's like this.

9                   THE WITNESS: I'm sorry.

10                  MR. GUIRGUIS: You're fine.

11                  MS. MCCAWLEY: You're fine.

12                  A.       So it's actually a massager  
13       for shoulders. It's got a long base.  
14       It's got quite a -- it's got like a  
15       rubber white head.

16                  And, yeah, it was really --  
17       it's not -- it's not used for sexual  
18       purposes.

19                  Q.       It's not?

20                  A.       No, that's what I'm saying.  
21       It's not a vibrator.

22                  Q.       Okay.

23                  A.       It was actually quite  
24       painful for me --

25                  Q.       Okay.

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1 HIGHLY CONFIDENTIAL AEO

2 A. -- actually.

3 Q. Okay. Did you tell him to  
4 stop?

5 A. I told him to stop when  
6 he -- because he pressed the vibrator  
7 head on my clitoris and it was  
8 incredibly painful. It hurt me.  
9 That's a very sensitive area, and the  
10 strength of this specific device he  
11 used is -- it's not really meant for  
12 that.

13 Q. Right. Did he stop when you  
14 said stop?

15 A. No.

16 Q. And how long did this  
17 message --

18 A. Until -- until I orgasmed.

19 Q. And then what happened?

20 A. He just stopped. And I got  
21 dressed and I left.

22 Q. Was there any discussion?

23 A. No.

24 Q. Did he give you any money?

25 A. No.

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Can we stop  
3 for a moment? The witness is  
4 crying. I think maybe we should  
5 take a moment, have a moment.

6 MS. MENNINGER: Okay. Mark  
7 that as Defendant's Exhibit 2,  
8 and then we'll take a break for  
9 ten minutes.

10 (Defendant's Exhibit 2,  
11 hand-drawn picture, was marked  
12 for identification.)

13 (Time noted: 12:07 p.m.)

14 (Recess.)

15 (Time noted: 12:19 p.m.)

16 Q. So you just described for  
17 us, I think, what you recall being the  
18 third message with Jeffrey?

19 A. Yeah.

20 Q. Do you recall the next one  
21 after that?

22 A. It was -- it was basically  
23 the same. I was called to give  
24 Jeffrey messages.

25 Q. During that first trip to

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1 HIGHLY CONFIDENTIAL AEO

2 the island?

3 A. During the first trip, yeah.

4 Q. Can you approximate how many  
5 massages you gave to him during that  
6 first trip?

7 A. I would give him up to maybe  
8 two a day. The other girls, they had  
9 to also give him massages during that  
10 trip.

11 Q. And you don't remember how  
12 many days that trip was?

13 A. No, not specifically how  
14 many. It was a few days. It was a  
15 few days.

16 Q. At some point did the  
17 massages become different than the one  
18 you just described as the third  
19 message?

20 A. It was either Jeffrey lying  
21 on the massage -- me massaging him and  
22 it turning sexual or vice versa.  
23 Pretty much from the third sexual  
24 message I had with Jeffrey, all other  
25 massages were sexual.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Do you recall who was on the  
3 flight home from the first trip?

4 A. I don't recall who was on  
5 the flight home. I think it was all  
6 the people that were on the first  
7 flight there.

8 Q. Did you receive any  
9 compensation from Jeffrey during that  
10 first trip?

11 A. I received like \$300 or  
12 something. Not a lot.

13 Q. When did you get that?

14 A. At the end of the trip.

15 Q. How was it given to you?

16 A. In cash.

17 Q. By whom?

18 A. That specific time it was  
19 Jeffrey.

20 Q. Where were you when he gave  
21 that you money?

22 A. I can't recall where I was  
23 when he gave me the cash.

24 Q. Did -- were you still with  
25 the other females that had been on the

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1 HIGHLY CONFIDENTIAL AEO

2 plane?

3 A. When he gave me the cash?

4 Q. Yes.

5 A. I can't recall. I don't  
6 remember if someone was with me. But  
7 we all knew that we were going to get  
8 cash.

9 Q. Did you see him give cash to  
10 anyone else?

11 A. I saw him give cash to  
12 Natalya.

13 Q. How much did he give her, if  
14 you know?

15 A. I don't know.

16 Q. Did you see Natalya having  
17 any type of sexual relations with  
18 Jeffrey during the trip?

19 A. Yes, I did.

20 Q. When did you see that?

21 A. I didn't see it in the  
22 bedroom, but we were called on, like,  
23 a rotation visit for Jeffrey  
24 throughout the day and evening.

25 Q. When did you see Natalya

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1 HIGHLY CONFIDENTIAL AEO

2 having some type of sexual  
3 relationship with Jeffrey on the  
4 island during the first trip?

5 A. I didn't see her perform  
6 sexual acts on Jeffrey.

7 Q. Did anyone see you  
8 performing sexual acts on Jeffrey  
9 during the first trip to the island?

10 A. No.

11 Q. Did you tell any of these  
12 other women about what was going on  
13 during your massages with Jeffrey?

14 A. Yes.

15 Q. Who did you tell?

16 A. All the girls that were  
17 there.

18 Q. And, again, that is Natalya,  
19 Nadia and Jen?

20 MR. GUIRGUIS: Objection.

21 Q. Do you remember?

22 A. I can't say specifically if  
23 Jen was there. I can't remember Jen  
24 being there, so I don't like to bring  
25 Jen into the first trip.



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1 HIGHLY CONFIDENTIAL AEO

2 I saw her multiple times on  
3 the island, but I can't specifically  
4 place her there on the first trip. I  
5 just remember the key people that were  
6 there because they were the most vivid  
7 in my memory.

8 Q. Do you know if you took any  
9 pictures during that first trip?

10 A. I don't think during that  
11 first trip, no. We weren't actually  
12 allowed to bring any electronic  
13 devices with us.

14 Q. How did you learn that rule?

15 A. Natalya told me and the  
16 other girls told me.

17 Q. Who are the other girls?

18 A. Jen.

19 Q. Did you take a camera to the  
20 island?

21 A. Not the first time, no.

22 Q. Did you have a digital  
23 camera at the time?

24 A. Yes, I did.

25 Q. What kind?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I can't remember.

3 Q. Did you have a phone with a  
4 camera on it?

5 A. I had a BlackBerry, yes,  
6 which you could take photos on.

7 Q. All right. Do you recall  
8 there being any sexual acts performed  
9 on the plane on the ride home during  
10 the first trip?

11 A. No.

12 Q. Okay. Do you recall going  
13 down a second time?

14 A. To the island?

15 Q. Yes.

16 A. Yes.

17 Q. When did that happen?

18 A. Shortly. I can't remember  
19 specifically when it was, but it  
20 wasn't on -- I don't know the time  
21 length. I saw Jeffrey and Ghislaine  
22 and the crowd quite a lot in New York  
23 as well, so it's not clear to me when  
24 the second trip was.

25 Q. When was the first time you

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1 HIGHLY CONFIDENTIAL AEO

2 met Ghislaine?

3 A. I'd been to the island a  
4 couple times before, and then I met  
5 Ghislaine on the island.

6 Q. Tell me about your meeting  
7 with her?

8 A. I remember being told by  
9 everyone before she arrived who she  
10 was. And I was pretty much told the  
11 type of person she was and that I had  
12 to do everything she told me to do.

13 Q. Who told that you?

14 A. Nadia, Sarah Kellen,  
15 Natalya, Jen. Every single girl that  
16 I came in communication with told me  
17 that.

18 Q. And what type of person did  
19 they tell you that she was?

20 A. She's incredibly  
21 intimidating. She's not someone you  
22 want to be stuck in an alley at night,  
23 put it that way. She's a very  
24 dangerous character and has  
25 connections.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. And that was communicated to  
3 you by this group of females: Nadia,  
4 Sarah, Natalya and Jen?

5 A. Yes.

6 Q. Anyone else?

7 A. I mean, it was a general  
8 conversation amongst the girls about  
9 Ghislaine, so there were other girls  
10 all the time. So during the duration  
11 of my stay -- so pretty much from  
12 my -- when I first arrived in New  
13 York, my entire time was spent with  
14 Jeffrey and Ghislaine and that crowd.

15 So, yeah, it was -- that's  
16 about everything.

17 Q. Okay. So you met --

18 A. I met a lot of girls who we  
19 all had the same opinion of Ghislaine;  
20 we were all frightened of her. She  
21 had a very odd relationship with  
22 Jeffrey and -- yeah, she's not a  
23 nice -- I'm sorry, I know she's your  
24 client, but she's not -- she's not a  
25 friendly, warm person.

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1 HIGHLY CONFIDENTIAL AEO

2 I liked her dog, though, her  
3 Yorkshire Terrier. Her dog was nice.

4 Q. You recall meeting her for  
5 the first time on the island?

6 A. Yeah. She flew in by  
7 helicopter.

8 Q. And that was after you were  
9 on the island a couple of times?

10 A. Yeah.

11 Q. Did she fly the helicopter?

12 A. I can't remember if she flew  
13 it or not. I just remember her  
14 getting out -- like getting out of  
15 a -- and going Ghislaine, and I was  
16 like -- I was quite frightened when  
17 she arrived, so...

18 Q. Was she alone or with  
19 someone?

20 A. I can't remember if she was  
21 with someone. I just remember the  
22 first time I saw her, I was like, is  
23 that it? She didn't look that scary  
24 when I first met her. Looks are  
25 deceiving.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       So the first time you saw  
3 her, she was getting off of a  
4 helicopter?

5           A.       Yeah.

6           Q.       And you don't recall if she  
7 flew the helicopter?

8           A.       I don't recall if she flew  
9 it herself or if there was a pilot  
10 there. I just remember she arrived on  
11 a helicopter.

12          Q.       What's the next thing you  
13 remember about your interactions with  
14 her personally?

15          A.       She stayed on the island a  
16 few days, and I didn't have a lot of  
17 interaction with her. I avoided her,  
18 to be honest.

19          Q.       Did you take pictures of  
20 her?

21          A.       No. We weren't allowed any  
22 digital cameras on the island.

23          Q.       Have you ever taken a  
24 picture of her?

25          A.       No. I didn't really feel

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1                   HIGHLY CONFIDENTIAL AEO  
2       the need to take pictures of Ghislaine  
3       for my photo album.

4           Q.       Apart from staying away from  
5       her and not having a lot of  
6       interactions, do you recall anything  
7       else about your first interaction with  
8       her on the island?

9           A.       Yeah. She was incredibly  
10       unpleasant to me. She wasn't friendly  
11       or warm.

12          Q.       What did she say or do?

13          A.       She was very dismissive.  
14       Just another girl, really.

15          Q.       Did you ever give her a  
16       massage?

17          A.       No.

18          Q.       Did she ever give you a  
19       massage?

20          A.       She massaged me once or  
21       twice, but it was to -- it was to  
22       refine my technique for Jeffrey.

23          Q.       This was on the first time  
24       you met her?

25          A.       Yeah, during that trip

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1                   HIGHLY CONFIDENTIAL AEO  
2       she -- because Jeffrey, again, he's  
3       quite specific on how he likes his  
4       massages and, yeah, I'm not -- that's  
5       not my forte, massages.

6           Q.       How did it come about that  
7       she was helping you to refine your  
8       massage techniques?

9           A.       We were just sitting in the  
10      main area by the big house. That's  
11      where we chilled out. There's a table  
12      there as well.

13                   And, yeah, we were just  
14      sitting on the sofas, and I think -- I  
15      can't remember if I was giving Jeffrey  
16      a massage, but we were all sitting  
17      together, and I think he was getting  
18      massaged by one girl and we were kind  
19      of taking it in turns.

20          Q.       Was it sexual?

21          A.       No, it wasn't sexual. But  
22      Ghislaine was there, and I wasn't  
23      doing it properly and she showed me  
24      how to massage him and how he liked  
25      it.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. What part of his body did  
3 she show you how to massage?

4 A. His feet, his hands.

5 Q. Did she say anything to you?

6 A. I can't remember  
7 specifically what she said to me. She  
8 said a lot of things to me.

9 Q. Okay. Well, tell me what  
10 you remember she said to you.

11 MR. GUIRGUIS: Objection.

12 When? Where? What? What are we  
13 talking about?

14 A. I can't remember  
15 specifically what she said to me. All  
16 I know is that she wasn't -- she  
17 wasn't a particularly nice person, to  
18 me or anybody. So very dictorial  
19 [sic].

20 Q. Unlimited by time or  
21 anything, do you recall anything  
22 Ghislaine said to you?

23 MR. GUIRGUIS: Objection.

24 You're asking her --

25 A. It was how to massage

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1 HIGHLY CONFIDENTIAL AEO

2 Jeffrey.

3 I remember speaking to her  
4 quite a lot about my FIT application.

5 I remember speaking to  
6 Ghislaine about my psychiatrist, about  
7 my weight. My weight was a big issue.  
8 And, in fact, everything was an issue  
9 with Ghislaine.

10 Q. During this first time you  
11 met her, other than discussing  
12 massages, did those other topics come  
13 up?

14 A. I can't remember the first  
15 encounter with Ghislaine, but it was  
16 pretty soon after. Everything  
17 snowballed quite quickly.

18 Q. Well, you saw her getting  
19 off the helicopter, correct?

20 A. Yeah.

21 Q. And you saw her on the  
22 island for a couple days that time,  
23 you said, correct?

24 A. Yeah.

25 Q. So during that time you saw

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1                   HIGHLY CONFIDENTIAL AEO  
2       her over a couple days, do you  
3       remember any other discussions you had  
4       with her apart from this message?

5           A.       We spoke about why I was  
6       there, New York. I mean, we -- you  
7       know, she got to know me. She asked  
8       me a lot of questions about my family  
9       life, my -- I mean, she questioned me  
10      a lot on my personal life.

11          Q.       Was anyone else present when  
12      you were having these discussions with  
13      Ghislaine?

14          A.       Yes, everyone. Everyone  
15      that was -- Sarah Kellen, Jeffrey,  
16      Natalya.

17          Q.       Was there anyone different  
18      on this trip?

19          A.       Nadia as well. Nadia was  
20      there.

21          Q.       Anyone else on this trip?

22          A.       I can't remember.

23          Q.       Was Jean Luc Brunel there?

24          A.       Not the first time I met  
25      Ghislaine.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Was anyone else there?

3 A. I can't remember.

4 Q. Anything that would refresh  
5 your memory?

6 A. If you could give me the  
7 plane logs or something, or names or  
8 photos. Ten years, as I said, is an  
9 incredibly long time. I don't  
10 remember who -- I mean, it was such a  
11 long time for me.

12 I came to New York, my  
13 intention was to meet many people,  
14 make new friends, make a new life for  
15 myself. So I didn't really -- I don't  
16 remember names specifically.

17 Q. Do you remember any  
18 descriptions of other people who were  
19 on the island the first time you met  
20 Ghislaine?

21 A. They were all beautiful  
22 people. I just remember being  
23 surrounded by beautiful young people.  
24 They were always girls. There were  
25 always girls. You know, girls didn't

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1                   HIGHLY CONFIDENTIAL AEO  
2       even have time to kind of remember  
3       girls' names because there was always  
4       people leaving the island, popping in,  
5       flying in. So there was a constant  
6       flux of people coming in, popping in  
7       visiting Jeffrey and Ghislaine.

8           Q.       So the first time you met  
9       Ghislaine, you saw her get off a  
10      helicopter. She was on the island for  
11      a couple days.

12                   Any other females you  
13      remember being there on that occasion?

14                   MS. MCCAWLEY: Objection,  
15      asked and answered.

16           A.       Sarah Kellen, Nadia,  
17      Natalya, and I can't remember any  
18      others.

19           Q.       Can you remember any  
20      descriptions of other people who were  
21      there on that occasion?

22                   MR. GUIRGUIS: Objection,  
23      asked and answered.

24           A.       They were just pretty. They  
25      were just beautiful.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Hair color?

3 MR. GUIRGUIS: Objection.

4 A. Normal.

5 Q. Height?

6 A. I don't recall height.

7 Q. Any other physical  
8 characteristics at all?

9 MR. GUIRGUIS: Objection.

10 A. Just that they were  
11 extremely beautiful. I've never seen  
12 girls like this.

13 Q. Well, you had been a model  
14 in London, right?

15 A. Yeah, I have, but, you know,  
16 Jeffrey Epstein, he acquired the  
17 elite, didn't he, you know, him and  
18 Ghislaine. So they were pretty much  
19 the crème de la crème of the crop, I  
20 would say, the girls that were around  
21 him.

22 Q. On this first occasion when  
23 you met Ghislaine and there were  
24 beautiful girls, who you don't recall  
25 what they look like; you recall they

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1 HIGHLY CONFIDENTIAL AEO

2 were beautiful?

3 A. Yeah, there were beautiful  
4 people constantly surrounded by  
5 Jeffrey Epstein and Ghislaine. They  
6 were only surrounded by beautiful  
7 people, beautiful girls.

8 Q. But apart from that, you  
9 don't have any other specifics?

10 A. I don't recall the  
11 appearance of the other girls. I  
12 don't -- as I will say again, there  
13 was a constant stream of people coming  
14 in, going off the island, popping in,  
15 popping out, girls flying in, girls  
16 flying out. There were girls on the  
17 island that were there shorter time  
18 frames than me and flew out.

19 I didn't really -- I hung  
20 out with my crew: Natalya, Jen. They  
21 were -- they were my friends. I  
22 thought they were my friends. So I  
23 didn't really cozy up to any of the  
24 other girls.

25 It's like high school, you

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1                   HIGHLY CONFIDENTIAL AEO  
2       know, you're not friends with  
3       everybody. You ask me who -- everyone  
4       I went to school with, I don't  
5       remember. I don't have a clue. I  
6       don't know who they are.

7           Q.       Do you have a best friend  
8       from school?

9           MR. GUIRGUIS: Objection.

10       A.       Several. Several. I mean,  
11       who has any best friend at school?  
12       School's school. We don't make best  
13       friends at school.

14       Q.       Who is Pumla?

15       A.       She was an acquaintance that  
16       I met in New York.

17       Q.       Where did you meet her?

18       A.       I think I met her at a bar  
19       or something.

20       Q.       Was she a friend of yours  
21       during this time period?

22       A.       She was an acquaintance. I  
23       would say friend is -- yeah, I  
24       wouldn't say friend. I'd say  
25       acquaintance.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. So on this occasion where  
3 you met Ghislaine on the island and  
4 you spoke to her about massage, did  
5 you ever have any other sexual-type  
6 interactions with her?

7 MS. MCCAWLEY: I didn't hear  
8 the end of that. Did you say  
9 "him"?

10 Q. Sexual-type interactions  
11 with her?

12 A. With her?

13 Q. Ghislaine?

14 A. No.

15 Q. And do you recall if she  
16 flew with you back on the plane?

17 A. I can't remember.

18 Q. What's the next time you  
19 went to the island?

20 A. Again, I don't remember  
21 specifically. I went various several  
22 times during the duration. So I  
23 remember there was a -- it was several  
24 times. I can't remember the next time  
25 I went to the island. I mean, it's...

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Was it before you went back  
3 to South Africa to visit?

4 A. Yes.

5 Q. All the visits to the island  
6 were before that?

7 MS. MCCAWLEY: Objection.

8 A. Yeah.

9 Q. What's the next time you  
10 remember meeting Ghislaine?

11 A. I met her at the office in  
12 New York.

13 Q. What's the office?

14 A. Jeffrey's office, main  
15 office.

16 Q. Where is that?

17 A. I don't remember the  
18 location. It's central. It's got a  
19 courtyard. Like when you walk in,  
20 there's like a courtyard.

21 Q. What were you doing at  
22 Jeffrey's office in New York?

23 A. We were preparing for my  
24 college application. Jeffrey often  
25 wanted to see just how I was doing, so

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1 HIGHLY CONFIDENTIAL AEO

2 I had to regularly pop in to see him  
3 and Ghislaine. And Ghislaine would  
4 often check how I was doing and blah,  
5 blah, blah, etcetera.

6 Q. What were you doing to  
7 prepare for your college application?

8 A. I had to write an essay.

9 Q. When did you --

10 A. Also, I had to do -- like,  
11 you know how you apply for college  
12 applications; you've got your  
13 application forms and such. So it was  
14 more admin.

15 Q. And you were going to  
16 Jeffrey's office to work on your  
17 forms?

18 A. Yes. And to just say hi. I  
19 was -- well, I never went on my own  
20 accord. I was either invited or told  
21 to be there by either Ghislaine or  
22 Jeffrey. I also went to the offices  
23 on a number of occasions for private  
24 legal matter.

25 Q. What's the private legal

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1 HIGHLY CONFIDENTIAL AEO

2 matter?

3 MR. GUIRGUIS: Objection.

4 I'm going to direct you not to  
5 answer if it's unrelated to this  
6 case.

7 Q. Was there an attorney  
8 present?

9 A. Yes.

10 Q. What was the name of the  
11 attorney who was present?

12 A. Alan Dershowitz.

13 Q. So I was asking about the  
14 second time you met Ghislaine. It was  
15 at Jeffrey's office in New York?

16 A. Yes.

17 Q. How did you come to be in  
18 Jeffrey's office in New York where you  
19 met Ghislaine the second time?

20 A. I was told to be there.

21 Q. Who told you to be there?

22 A. I think it was Ghislaine.

23 Q. How did Ghislaine tell you  
24 to be there?

25 A. I can't remember if it was

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1                   HIGHLY CONFIDENTIAL AEO  
2           via telephone call. I can't remember  
3           the exact communication that she used.  
4           But I was told to regularly be there  
5           when they wanted me there, and just  
6           grabbed a taxi and arrived at the  
7           office.

8           Q.       Well, I'm asking you about  
9           the second time.

10                   So you met her on the  
11           island, and the next thing you know,  
12           you have a communication from her in  
13           New York?

14           A.       Well, she was always with  
15           Jeffrey in his office, so it's like --  
16           okay, so let me explain it.

17                   So you go to an office and  
18           you see Jeffrey's office there and  
19           Ghislaine -- Ghislaine was always at  
20           Jeffrey's office, so I think she had  
21           her own office there.

22                   So when you walk in and  
23           you've met people before, you kind of  
24           say hi to everyone. You know, you  
25           have a little chitchat.

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1 HIGHLY CONFIDENTIAL AEO

2 Do you understand? You  
3 don't -- you don't -- you know, I  
4 chatted with Ghislaine, I chatted with  
5 Jeffrey. It was a busy office. I  
6 can't remember specifically what was  
7 said. It was just a check-in, kind  
8 of.

9 Q. So you were going there to  
10 work on your college application, and  
11 you happened to see Ghislaine in the  
12 offices?

13 MS. MCCAWLEY: Objection.

14 A. She -- you know, she  
15 participated in the -- you know, a  
16 lot. She was interested in me. I  
17 was -- you know, she interacted with  
18 me.

19 Q. I know. I'm trying to  
20 understand when you did this. When  
21 was it?

22 A. It was the second time, the  
23 first time I went to the office.

24 Q. The first time you went to  
25 the office, the second time you met

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1 HIGHLY CONFIDENTIAL AEO

2 Ghislaine?

3 A. Yes.

4 Q. And when was it relative to  
5 the first time you met Ghislaine?

6 A. I can't remember if it was a  
7 couple of weeks later. I don't  
8 remember the exact time frame of how  
9 many days or weeks there was between  
10 the first trip and the -- when I went  
11 in to the office.

12 Q. But you do recall going into  
13 the office to work on your college  
14 application?

15 MS. MCCAWLEY: Objection.

16 A. Yes. Well, I went in a  
17 number of times to the office. So,  
18 like, we regularly had to report to  
19 Jeffrey in the office. It was a -- we  
20 were called all the time there.

21 Q. What do you mean, you had to  
22 report there?

23 A. Well, Jeffrey liked to check  
24 in with all of us.

25 Q. How was it communicated to

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1 HIGHLY CONFIDENTIAL AEO

2 you that you needed to report to the  
3 office?

4 A. Jeffrey. I was just told to  
5 be there; I had to be there.

6 Q. Who told that you?

7 A. Jeffrey and Ghislaine.

8 Q. Anyone else?

9 A. Sarah Kellen and Lesley  
10 Groff.

11 Q. How did they communicate it  
12 to you?

13 A. By telephonic call.

14 Q. To your cell phone?

15 A. And BlackBerry, which they  
16 provided me.

17 Q. So you did not have a  
18 BlackBerry before you met Jeffrey?

19 A. No.

20 Q. Then you got a BlackBerry  
21 when you were --

22 A. That's correct.

23 Q. -- acquainted with him.

24 And what happened with the  
25 phone you had before?



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1 HIGHLY CONFIDENTIAL AEO

2 A. It's got lost through  
3 translation. I have moved several  
4 times through the years, so...

5 Q. So you got messages or phone  
6 calls?

7 A. BBMs, phone calls, text  
8 messages.

9 All the emails that they  
10 sent me, I think you guys have. There  
11 wasn't a lot of email correspondence.  
12 The majority of it was done by phone  
13 call.

14 Q. Did you have any emails with  
15 Ghislaine?

16 A. No, no email correspondence  
17 with Ghislaine.

18 Q. Did you have her phone  
19 number?

20 A. I did at the time, yeah.

21 Q. Do you remember what it was?

22 A. No.

23 Q. Do you remember what your  
24 number was?

25 A. No.

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Objection,  
3 asked and answered.

4 Q. Tell me about any  
5 conversations you had with Ghislaine  
6 that involved FIT.

7 MR. GUIRGUIS: Objection,  
8 form.

9 A. I can't remember the  
10 specific conversation. There were  
11 many conversations. I was just  
12 applying -- doing an application form.  
13 And they were trying to get me in.  
14 They -- yeah, I can't remember the  
15 exact -- I think Ghislaine also knew  
16 people there, so they were basically  
17 trying to get me into FIT.

18 Q. Well, tell me what you  
19 recall Ghislaine saying versus they?

20 A. I can't remember  
21 specifically the conversation, so I  
22 would not like to speculate. But I  
23 will give you the overall conversation  
24 was regarding my FIT application, but  
25 I cannot remember the specific content

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1                   HIGHLY CONFIDENTIAL AEO

2       or the specific words used.

3                   But it was surrounding my  
4       FIT application and an essay I had to  
5       write, and they both proofread my FIT  
6       application as well.

7           Q.       And did they both read your  
8       essay?

9           A.       Yes, they did.

10          Q.       When did you write that  
11       essay?

12          A.       I can't remember.

13          Q.       Before you went to South  
14       Africa?

15          A.       Yes.

16          Q.       Do you know what the  
17       application deadline was?

18          A.       I don't know. I don't know.  
19       I can't remember.

20          Q.       When did you meet Alan  
21       Dershowitz?

22          A.       I don't remember the  
23       specific date. It was a few months  
24       after I had been here in New York.

25          Q.       Was it after you had gone to

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1                   HIGHLY CONFIDENTIAL AEO

2       the island?

3           A.       Yes.

4           Q.       Do you know what time of  
5       year?

6           A.       I mean, I think it was  
7       before winter.

8           Q.       Well, you were here in the  
9       fall.

10          A.       Yeah.

11          Q.       And you left in the winter?

12          A.       Yeah. I left in May.

13          Q.       So did you meet him before  
14       you went to South Africa?

15          A.       Yes.

16          Q.       Well, let's be clear. You  
17       were here until you went to South  
18       Africa, and you left for a while and  
19       then you came back, right?

20          A.       Mm-hmm.

21          Q.       How long were you gone?

22          A.       I think about three -- about  
23       three weeks.

24          Q.       So you met him before you  
25       went to South Africa?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Yes.

3 Q. And tell me about when you  
4 met Alan.

5 A. I first met Alan at the  
6 offices.

7 Q. And tell me what happened.

8 A. I can't really tell you what  
9 happened, because it's about a legal  
10 matter.

11 Q. Was he your lawyer?

12 A. He was going to be assigned  
13 to be my lawyer.

14 Q. Assigned to be your lawyer?

15 A. Through Jeffrey's  
16 instruction.

17 Q. Okay. Was he your lawyer?

18 MS. MCCAWLEY: Objection,  
19 asked and answered.

20 MS. MENNINGER: I don't know  
21 if there's a privilege.

22 MR. GUIRGUIS: There's a  
23 privilege whether he was retained  
24 or not, right? I mean, if you're  
25 at a cocktail party and you speak

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1           HIGHLY CONFIDENTIAL AEO  
2           to a lawyer, you know that  
3           conversation is privileged.  
4           So...

5           MS. MENNINGER: Well, I  
6           don't, actually.

7           MR. GUIRGUIS: You're free  
8           to research it.

9           MS. MENNINGER: I will ask  
10          questions, then, to try to  
11          establish whether or not there's  
12          a good-faith basis.

13          Q.       Did you approach Alan  
14          Dershowitz for the purpose of seeking  
15          legal advice?

16          A.       I was introduced to Alan.

17          Q.       By whom?

18          A.       Jeffrey Epstein.

19          Q.       On what day?

20          A.       I don't recall what day.

21          Q.       Was it related to some event  
22          that had occurred just before that?

23          A.       Yes, that's correct.

24          Q.       Were you in touch with any  
25          law enforcement authorities?

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1 HIGHLY CONFIDENTIAL AEO

2 A. No.

3 Q. Hmm?

4 A. No.

5 Q. Was Jeffrey Epstein in the  
6 room when you were speaking with Alan  
7 Dershowitz?

8 A. Yes.

9 Q. Did Jeffrey Epstein overhear  
10 your conversation with Alan  
11 Dershowitz?

12 A. Yes.

13 Q. What did you talk about with  
14 Alan Dershowitz?

15 MR. GUIRGUIS: Objection.

16 A. It --

17 MR. GUIRGUIS: Objection. I  
18 direct the witness not to answer.

19 MS. MENNINGER: A third  
20 party was in the room; you've  
21 heard that, Counsel. And you  
22 know that means that's a waiver.

23 MS. MCCAWLEY: No. I mean,  
24 they would have been involved --  
25 we don't know what the situation

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1           HIGHLY CONFIDENTIAL AEO  
2           is. They could have been  
3           involved together. There could  
4           be a number of reasons why  
5           Jeffrey had some sort of common  
6           interest with her with that.

7           Q. Did you sign a common  
8           interest agreement with Jeffrey?

9           MR. GUIRGUIS: Objection.  
10          Do not answer.

11          MS. MENNINGER: Whether she  
12          had a common interest agreement  
13          with Jeffrey, you're instructing  
14          her not to answer; is that right,  
15          Counsel?

16          MR. GUIRGUIS: Do you have  
17          realtime in front of you,  
18          Counsel?

19          MS. MENNINGER: I don't.

20          MR. GUIRGUIS: You don't?  
21          You can borrow mine.

22          MS. MENNINGER: I don't want  
23          it. Thank you.

24          MR. GUIRGUIS: Okay.

25          Q. Anyone else in the room when



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1 HIGHLY CONFIDENTIAL AEO

2 you spoke with Mr. Dershowitz?

3 A. No.

4 Q. Describe Mr. Dershowitz for  
5 me.

6 A. He -- old age; white, pasty  
7 skin; not very attractive. Wears  
8 glasses. Bit of an ugly man, really.

9 Q. Did he have any facial hair?

10 A. I can't recall at that time,  
11 no.

12 Q. Mustache?

13 A. I can't remember.

14 Q. Beard?

15 A. I can't remember.

16 Q. You can't remember if he had  
17 a mustache or a beard?

18 MR. GUIRGUIS: Objection,  
19 asked and answered.

20 MS. MCCAWLEY: Objection.

21 A. I don't recall seeing a  
22 massage -- sorry, a mustache on Alan  
23 Dershowitz. I don't recall a massive  
24 amount of facial hair. I recall Alan  
25 Dershowitz. Whether he had stubble or

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1 HIGHLY CONFIDENTIAL AEO

2 not, I'm -- yeah, it's -- he didn't  
3 have a beard, I don't think.

4 Q. All right. Did you sign an  
5 affidavit that you submitted in this  
6 case?

7 A. Yes.

8 Q. Did you make the allegation  
9 in your declaration that you had a  
10 sexual relationship with Alan  
11 Dershowitz?

12 A. Yes, I absolutely did.

13 Q. When did you have sex with  
14 Alan Dershowitz?

15 A. I can't remember the exact  
16 time, but it was in Jeffrey's New York  
17 apartment.

18 Q. Where in the apartment?

19 A. It was in a bathroom. I  
20 can't remember.

21 Q. Was it before or after you  
22 had this conversation that you won't  
23 describe?

24 A. It was after.

25 Q. So do you recall what month

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1 HIGHLY CONFIDENTIAL AEO

2 that was? Before you went to South  
3 Africa or after you went to South  
4 Africa?

5 A. I can't remember.

6 Q. How long did you speak to  
7 Alan Dershowitz during your first  
8 meeting with him?

9 A. Until I was finished  
10 explaining what my legal matter was.

11 Q. Did he believe you to be --  
12 did he believe that he was your lawyer  
13 during that conversation?

14 MR. GUIRGUIS: Objection.

15 MS. MCCAWLEY: Objection.

16 MR. POTTINGER: Please.

17 MR. PAGLIUCA: All right,  
18 guys. You know, let's just do  
19 the deposition here without the  
20 chorus over there.

21 MR. GUIRGUIS: And without  
22 the speeches as well.

23 We agree, let's carry on  
24 without asking ridiculous  
25 questions about what other

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1 HIGHLY CONFIDENTIAL AEO

2 people's mental state was. I  
3 think that's a good idea. Let's  
4 carry on.

5 Counsel?

6 Q. Did you ever sign a fee  
7 agreement with Alan Dershowitz?

8 A. No.

9 Q. Did you ever appear in court  
10 with Alan Dershowitz?

11 A. No.

12 Q. Did you ever appear in court  
13 yourself?

14 A. No.

15 Q. Did you ever have any  
16 contact with any law enforcement  
17 officers while you were in New York?

18 A. No.

19 Q. Any police?

20 A. No.

21 Q. After you left that meeting  
22 with Alan Dershowitz, when did you see  
23 him next?

24 A. I can't remember. I think  
25 it was at dinner. There was a dinner,

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1 HIGHLY CONFIDENTIAL AEO

2 yeah.

3 Q. And do you know whether the  
4 dinner was before or after you went to  
5 South Africa?

6 A. I can't remember the  
7 specific time period, so I don't  
8 remember if it was before or after.  
9 But it was --

10 Q. Where was the dinner?

11 A. It was in a restaurant in  
12 New York.

13 Q. What restaurant?

14 A. I can't remember.

15 Q. Who else was there?

16 A. I remember Alan, Jeffrey,  
17 myself. And I can't remember if  
18 others -- if there were other people  
19 there.

20 Q. What type of restaurant was  
21 it?

22 A. It was a nice restaurant.

23 Q. Do you remember the type of  
24 cuisine?

25 A. No.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       When was the next time --  
3 what do you remember discussing that  
4 dinner?

5           A.       The legal matter I had.

6           Q.       Did you consider him to be  
7 your lawyer at that dinner?

8           A.       Yes, I did.

9           Q.       What's the next time that  
10 you saw Alan Dershowitz?

11          A.       At Jeffrey's New York  
12 mansion.

13          Q.       When was that?

14          A.       It was after the second time  
15 I had met Alan.

16          Q.       Had you been to South  
17 Africa?

18          A.       I can't remember.

19          Q.       Tell me what happened during  
20 that encounter.

21          A.       I walked in the room -- I  
22 walked in the house. Jeffrey and  
23 Nadia and Alan were there.

24          Q.       What happened after you  
25 walked in the house?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I -- it was really strange,  
3 because Nadia didn't like me. And so  
4 when I arrived, we had -- I think -- I  
5 can't remember if I had, like, water  
6 or whatever.

7 Nadia took me upstairs. I  
8 remember there was a room. I didn't  
9 quite understand what was going on at  
10 the time. I knew obviously something  
11 was going on, because I never met  
12 Nadia socially.

13 So Nadia started undressing  
14 me in the room. She started  
15 undressing me by the bed. We got on  
16 the bed. I kind of knew what was  
17 going on from that. The girls were  
18 often forced to have sex with each  
19 other for Jeffrey's pleasure, so it  
20 was just another occasion, I guess.

21 Jeffrey then walked in the  
22 room. He started masturbating under  
23 his clothes. He put his hand in his  
24 trousers. A few minutes later Alan  
25 walked in the room. He started

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1                   HIGHLY CONFIDENTIAL AEO  
2       undressing, he got on the bed with  
3       Nadia and myself, and we basically had  
4       a three-way sexual interaction.

5           Q.       Was Alan fully unclothed?

6           A.       During -- when? At what  
7       specific -- he walked in with clothes.

8           Q.       And he got fully undressed?

9           A.       Yes.

10          Q.       So you saw his entire naked  
11       body?

12          A.       Yes.

13          Q.       Did you notice anything  
14       specific about his body?

15          A.       Not that I recall. I mean  
16       -- yeah, not that I -- I can't really  
17       remember. It was quite a -- it was  
18       a -- it wasn't a pleasant experience.

19          Q.       What did you do with Alan?

20          A.       I gave him oral sex,  
21       masturbated him.

22          Q.       Anything else?

23          A.       He did the same with Nadia.  
24       He performed the same on me.

25          Q.       Did he ejaculate?



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1 HIGHLY CONFIDENTIAL AEO

2 A. He did, yeah.

3 Q. In your mouth?

4 A. No.

5 Q. Did you have intercourse  
6 with him?

7 A. No, not penetration, no.

8 Q. Did you see him ejaculate  
9 more than once?

10 A. No, I didn't see him  
11 ejaculate more than once.

12 Q. You didn't notice any scars?

13 MS. MCCAWLEY: Objection.

14 A. I don't recall specific  
15 markings on every man I've been with  
16 body. So it's not something -- I  
17 wasn't ravishing Alan's body. I was  
18 trying to close my eyes and just get  
19 it done so I could go home and watch  
20 TV, really. So I wasn't really aware.

21 I didn't really like kind of  
22 go, woo, his body. I don't -- I don't  
23 recall his body at all. Like, I don't  
24 make a mental note of every man's body  
25 I've slept with.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Other than Jeffrey, is that  
3 the first time you had sex with  
4 another man in his home or on his  
5 property?

6 A. Sorry, can you just repeat  
7 the question.

8 MR. GUIRGUIS: Or rephrase  
9 it.

10 THE WITNESS: I'll just read  
11 it.

12 MR. GUIRGUIS: If you  
13 understand it.

14 A. Yeah, he was the only  
15 person, Alan Dershowitz.

16 Q. Did you have sex with him  
17 more than once?

18 A. No.

19 Q. At the occasion you just  
20 described, did he have an erection?

21 A. It was -- it was -- it  
22 wasn't particularly hard. It was  
23 pretty disappointing.

24 Q. And where did he ejaculate?

25 A. I had given him oral sex

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1                   HIGHLY CONFIDENTIAL AEO  
2           and, well, he ejaculated -- he  
3           ejaculated. I mean, there's only so  
4           many places a man can ejaculate. He  
5           didn't ejaculate on me.

6                   He didn't ejaculate in my  
7           mouth. I gave him oral and I  
8           masturbated him and finished him off.  
9           He ejaculated over himself, me.  
10          Just -- there wasn't a lot of  
11          ejaculation. I don't remember a lot  
12          of sperm. I didn't see massive  
13          amounts of semen. But I just remember  
14          him ejaculating, but it wasn't in my  
15          mouth.

16                Q.       And in terms of time frame,  
17          the best you can say is this is after  
18          you had been to the island a few  
19          times?

20                A.       That's correct.

21                Q.       And you don't remember if it  
22          was before or after you went to South  
23          Africa?

24                A.       I can't remember  
25          specifically, no.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did you see Alan Dershowitz  
3 again after that one occasion?

4 A. No.

5 Q. So you saw him at the  
6 office, you say saw him at dinner, and  
7 you saw him that one time in the  
8 bedroom at Jeffrey's house?

9 A. That's correct.

10 MS. MENNINGER: It's 1:00.

11 I think we should take a small  
12 lunch break.

13 (Time noted: 1:01 p.m.)

14 (Luncheon recess.)

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1                   HIGHLY CONFIDENTIAL AEO  
2                   A F T E R N O O N   S E S S I O N  
3                   ( Time noted:   1:54 p.m.)

4                   MR. GUIRGUIS:   Counsel,  
5                   before you commence with your  
6                   questioning, I think there's one  
7                   issue from this morning that the  
8                   witness wants to correct herself  
9                   on, so just let her do that now.

10                  THE WITNESS:   I said earlier  
11                  that I would just like to correct  
12                  that my lawyers are paying for --  
13                  they are covering my hotel  
14                  expense.

15                  MS. MENNINGER:   Thank you  
16                  for that clarification.

17                  THE WITNESS:   And --

18                  MR. GUIRGUIS:   Go ahead.

19                  THE WITNESS:   And my flight.

20                  MS. MENNINGER:   Thank you.

21                  SARAH RANSOME, RESUMED,  
22                  having been previously and duly  
23                  sworn, was examined and testified  
24                  further, as follows:

25                  CONTINUED EXAMINATION

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1 HIGHLY CONFIDENTIAL AEO

2 BY MS. MENNINGER:

3 Q. Going back to your first  
4 conversation with Alan Dershowitz, at  
5 any point in that conversation, had  
6 Mr. Dershowitz agreed to act as your  
7 lawyer?

8 A. Yes.

9 Q. Did he do anything in terms  
10 of contacting anyone on your behalf?

11 MR. GUIRGUIS: Objection.

12 Do not answer.

13 Q. What was the specific legal  
14 matter that you were seeking  
15 representation for?

16 MS. MCCAWLEY: Objection.

17 MR. GUIRGUIS: Objection.

18 Do not answer.

19 Q. What did you understand the  
20 purpose of Jeffrey Epstein being in  
21 the room for during that conversation?

22 A. Jeffrey was there to support  
23 me and Jeffrey was looking after me.

24 Q. When you engaged in sexual  
25 conduct with Alan Dershowitz, did you

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1                   HIGHLY CONFIDENTIAL AEO

2       see any evidence on his body of his  
3       surgical procedure?

4           A.       I don't recall seeing  
5       anything. I can't remember.

6           Q.       Did you see any bandages?

7           A.       I can't remember.

8           Q.       Did you see him bleed  
9       through his penis?

10          A.       Not that I recall.

11          Q.       Do you recall seeing  
12       Mr. Dershowitz bleed through his  
13       penis?

14                   MS. MCCAWLEY: Objection,  
15       asked and answered.

16          A.       Not that I recall.

17          Q.       When you were on the island,  
18       sometime less than ten times, you  
19       think, did you ever use any drugs?

20          A.       No.

21          Q.       Did you use cocaine?

22          A.       No.

23          Q.       Did you ever get thrown off  
24       the island for using cocaine?

25          A.       No.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did you drink alcohol?

3 A. No.

4 Q. None?

5 A. During on the island,  
6 whenever I was around Jeffrey,  
7 absolutely not.

8 Q. Other than going to the  
9 island, did you travel with Jeffrey  
10 anywhere else?

11 A. No.

12 Q. Did you ever travel anywhere  
13 with Ghislaine Maxwell?

14 A. No.

15 Q. Did you ever fly on an  
16 airplane with Ghislaine Maxwell?

17 A. I don't -- I don't remember.

18 Q. You don't remember any time  
19 you flew on a plane with Ghislaine  
20 Maxwell?

21 A. No, I don't remember. There  
22 were always many people on the plane.

23 Q. When you refer to the plane,  
24 you're referring to a private plane?

25 A. Jeffrey's plane, yes.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did you travel on more than  
3 one plane of Jeffrey's?

4 A. Not that I -- no, I don't  
5 remember. I don't remember.

6 Q. Can you visualize in your  
7 head any other layout of a different  
8 type of plane than the one you drew in  
9 Defendant's Exhibit 1?

10 A. No.

11 Q. Why did you go to South  
12 Africa in early 2007?

13 A. To visit my family.

14 Q. And which family members did  
15 you visit?

16 A. My father and my stepmother.

17 Q. Anyone else?

18 A. No.

19 Q. Any siblings?

20 A. My younger brother and  
21 sister lived with my parents; my dad  
22 and my stepmom and their two younger  
23 children.

24 Q. Did you see any school  
25 friends there?

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1 HIGHLY CONFIDENTIAL AEO

2 A. No.

3 Q. Who paid for your plane  
4 ticket to go to South Africa?

5 A. Jeffrey did.

6 Q. How did that come about?

7 A. I wanted to see my family,  
8 and he funded the plane ticket because  
9 he was funding everything else at that  
10 time.

11 Q. What else was he funding at  
12 that time?

13 A. Accommodation, travel,  
14 taxis, food, my prescription that I  
15 had to pay for, for the prescription  
16 that -- prescription drugs.

17 Q. Had you taken any  
18 prescriptions for mental health  
19 disorders before October 2006?

20 A. No.

21 Q. Have you taken any since May  
22 of 2007?

23 A. Yes, I have.

24 Q. Which ones?

25 A. Paroxetine.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Anything else?

3 MS. MCCAWLEY: I'm going to  
4 object. There's no time frame on  
5 this. You're talking about one  
6 year? All the years from 2007 to  
7 2015? Which I would say is  
8 inappropriate for a nonparty  
9 witness to talk about her -- if  
10 you're talking generally about  
11 prescriptions.

12 Q. Are you on any medications  
13 right now?

14 A. Yes, I am.

15 MS. MCCAWLEY: Objection.

16 Q. What are you on right now?

17 A. Paroxetine.

18 Q. What's that for?

19 A. It's for posttraumatic  
20 stress and anxiety. Paroxetine, about  
21 a year, a year now.

22 Q. Was it prescribed to you  
23 before you moved to Barcelona?

24 A. Yes, it was.

25 Q. Who prescribed it to you?

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Objection.

3 You don't have to answer  
4 that.

5 MS. MENNINGER: On what  
6 grounds, Counsel?

7 MR. GUIRGUIS: I don't know  
8 what period you're talking about.  
9 I don't know what doctor you're  
10 talking about. I don't know why  
11 any of this is relevant. That's  
12 why I'm objecting.

13 MS. MENNINGER: So you're  
14 objecting on relevance grounds?

15 MR. GUIRGUIS: I'm objecting  
16 for relevance, and also for the  
17 same reasons that were just  
18 explained by counsel for  
19 plaintiff, which is that this is  
20 a nonparty witness and you're not  
21 even proffering a reason why  
22 you're asking the question.

23 So, yes, I'm not going to  
24 let this go totally far afield  
25 without objection. If you'd like

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1                   HIGHLY CONFIDENTIAL AEO

2                   to proffer a reason, we can talk  
3                   about it.

4                   Q.            You've been taking  
5                   paroxetine for approximately a year?

6                   A.            Mm-hmm.

7                   Q.            Did you take any medications  
8                   between 2007 and 2016 for any mental  
9                   health disorders?

10                  A.            Yes, I did.

11                  Q.            What were they?

12                  A.            When I moved back to the UK,  
13                  it was the same prescription drugs  
14                  that Jeffrey's psychiatrist had  
15                  prescribed me. I continued on with my  
16                  medication even though I was wrongly  
17                  diagnosed. I didn't know I had been  
18                  wrongly diagnosed.

19                  Q.            When did you learn you had  
20                  been wrongfully diagnosed?

21                  A.            When I went to a real  
22                  doctor.

23                  Q.            When was that?

24                  A.            I saw a psychologist after  
25                  2008, and they told me that the drugs

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1 HIGHLY CONFIDENTIAL AEO

2 I had been prescribed were incorrect.

3 Q. Those are the ones you  
4 mentioned earlier in your testimony?

5 A. Yeah. I had to stop and  
6 change medication, because I was first  
7 started on lithium. The lithium made  
8 me put on weight at quite a rapid  
9 rate, so I was put on so many  
10 different types of medication because  
11 I didn't -- not every one agrees with  
12 you. Weight was a massive issue for  
13 Ghislaine and Jeffrey, so the lithium  
14 just didn't work for me. I mean, I  
15 put on weight quite quickly.

16 Q. What did Ghislaine Maxwell  
17 say to you about weight?

18 A. Well, what did she not say?  
19 She bullied me massively about my  
20 weight.

21 Q. What did see say?

22 A. I was told that I would lose  
23 Jeffrey's financing if I didn't lose  
24 weight, and I would not -- they would  
25 not help me get into FIT.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Who were you told that by?

3 A. Ghislaine and Jeffrey.

4 Q. In the same conversation?

5 A. Various conversations.

6 Q. Tell me your conversations  
7 with Ghislaine. When did she say that  
8 to you?

9 A. On the island.

10 Q. Before you went to South  
11 Africa?

12 A. Yes.

13 Q. And was that in person?

14 A. Yes.

15 Q. Who else was present?

16 A. Sarah Kellen, Nadia, a girl  
17 named [REDACTED] and a girl named [REDACTED].  
18 Sorry, I just remembered a name. A  
19 girl named [REDACTED] and a girl named  
20 [REDACTED].

21 Q. So they were all present  
22 when you had a discussion with  
23 Ghislaine about your weight on the  
24 island?

25 A. Yes.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. And what did Ghislaine say  
3 to you about your weight when you were  
4 on the island in front of all these  
5 people?

6 A. I can't remember the  
7 specific conversation, how it went.  
8 We got into an argument about my  
9 weight, quite a heated argument.

10 Q. What do you recall about the  
11 argument?

12 A. I recall it got so heated  
13 that I ran off and tried to swim off  
14 the island. I wanted to get as far  
15 away from Jeffrey and Ghislaine as  
16 possible.

17 Q. Okay. And then what  
18 happened?

19 A. I left the main house. I  
20 took -- there's like a buggy thing.  
21 It was evening. I drove to a  
22 particular spot on the island. It was  
23 -- so Jeffrey's island is quite rocky  
24 around the edges, so -- and it's not  
25 really -- you can't just go into the



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1                   HIGHLY CONFIDENTIAL AEO  
2       water. It was quite steep. And,  
3       well, I didn't really know how to swim  
4       away. I didn't know how to escape.  
5       But I wanted to, at that precise  
6       moment, get as far as away from him as  
7       possible.

8           Q.       So you had a heated argument  
9       about your weight with Ghislaine?

10       A.       Ghislaine and Jeffrey.

11       Q.       They were both there?

12       A.       Yes.

13       Q.       And do you remember anything  
14       that was said during that argument?

15       A.       It was basically an  
16       ultimatum that I either lose weight  
17       or -- or that's it.

18                   THE WITNESS: Sorry, can I  
19       -- sorry. I need to get a  
20       headache tablet, if you don't  
21       mind.

22                   MS. MENNINGER: Go off the  
23       record for a second.

24                   (An off-the-record  
25       discussion was held.)

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MENNINGER: Go back on.

3 Q. You were given an ultimatum  
4 to lose weight or what?

5 A. They wouldn't help me to get  
6 into FIT, and that my time with  
7 Jeffrey would be -- would end.

8 Q. Who said what?

9 A. Well, they both -- they both  
10 said it in so many words. I can't  
11 remember the exact conversation. I  
12 remember it being heated. I remember  
13 them giving me the ultimatum. I think  
14 a few curse words were shared. I  
15 can't -- it was a very heated  
16 conversation. I can't remember the  
17 exact words.

18 Q. Was Natalya there?

19 A. No, I don't recall her being  
20 there.

21 Q. Were you taking the  
22 medications that you talked about  
23 earlier during this time period?

24 A. Yes.

25 Q. Had you put on weight since

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1 HIGHLY CONFIDENTIAL AEO

2 taking those medications?

3 A. Yes, I had. And I had also  
4 put on weight because I wasn't allowed  
5 to smoke any cigarettes at all, with  
6 Jeffrey on the island or anywhere near  
7 Jeffrey. Jeffrey wasn't allowed to  
8 know that we smoked.

9 So I put on also a lot of  
10 weight as well, in conjunction with  
11 the lithium. So yeah.

12 Q. How did the topic of your  
13 weight come up?

14 A. Well, I wasn't as skinny as  
15 the other girls, and Jeffrey liked his  
16 girls very thin.

17 Q. Were you interested in  
18 modeling at that point in time?

19 A. I was doing freelance  
20 modeling at the time, but I mean, I  
21 wasn't exactly going to be a Kate  
22 Moss. And the modeling agency thought  
23 I wasn't petite enough for them  
24 either.

25 I would like to clarify I

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1           HIGHLY CONFIDENTIAL AEO  
2       wasn't actually fat; I was normal  
3       weight, by the way, just to make that  
4       clear. I am 64, 65 kilograms at that  
5       time.

6           Q.       Why did you understand that  
7       Jeffrey and Ghislaine wanted you to  
8       lose weight?

9           A.       I was one of the girls that  
10       Jeffrey had sexual encounters with  
11       regularly. He liked his girls thin.

12          Q.       Did you ask Jeffrey to help  
13       you become a model?

14          A.       No. I wanted to get a  
15       degree and an education.

16          Q.       So you were not attempting  
17       to become a model at that point in  
18       time?

19          A.       No. I wanted to get an  
20       education as opposed to being a model.

21          Q.       Did you talk to Jean Luc  
22       Brunel about becoming a model?

23          A.       I -- as I was freelancing  
24       during that time, or trying to get  
25       freelancing work, Jeffrey kept us on a

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1                   HIGHLY CONFIDENTIAL AEO  
2       little string with his massage  
3       payments, so I wanted to earn a  
4       separate income while I was doing my  
5       education to fund my living expenses.  
6       So, you know, I wanted to potentially  
7       increase my jobs.

8                   But no, my job was not to be  
9       a high-fashion model. I wanted to get  
10      my degree, get my education and work  
11      in the fashion industry.

12           Q.       You had worked as a model  
13      during college earlier, correct?

14           A.       Yes.

15           Q.       And you saved up money from  
16      that job, correct?

17           A.       Yes.

18           Q.       And you had used that money  
19      to fly to New York at some point,  
20      correct?

21           A.       Yes.

22           Q.       And what you're saying now  
23      is you would also potentially do  
24      modeling while you were studying in  
25      the future?

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Objection.

3 That's not at all what she's  
4 saying.

5 A. As in future, as in would I  
6 do modeling now?

7 Q. No. I'll rephrase the  
8 question.

9 A. Please.

10 MS. MENNINGER: Let's take a  
11 break, go off the record. And  
12 when you finish the salad, we'll  
13 proceed.

14 (Time noted: 2:14 p.m.)

15 (Recess.)

16 (Time noted: 2:15 p.m.)

17 MS. MENNINGER: Go back on  
18 the record.

19 Q. At the time you were having  
20 a discussion with Jeffrey and  
21 Ghislaine about your weight when you  
22 were on the island, did you have any  
23 intention of being a model at that  
24 time?

25 A. I was a freelance model. I

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1           HIGHLY CONFIDENTIAL AEO  
2           wanted to increase my workload to help  
3           fund my living expenses. So it was  
4           not my intention to be a full-time  
5           model, because I quite clearly applied  
6           to a college to get an education that  
7           I was promised by Jeffrey Epstein.

8           Q.       Between January of 2007 and  
9           today, have you worked as a model?

10          A.       No.

11          Q.       When you left for South  
12          Africa, did you have a ticket to  
13          return to the U.S.?

14          A.       At that time, a return  
15          ticket hadn't been booked by Jeffrey  
16          yet.

17          Q.       You traveled to South Africa  
18          to visit your family without a return  
19          ticket?

20          A.       Yes.

21          Q.       Did anyone travel with you  
22          to South Africa?

23          A.       No.

24          Q.       Your mother was not in South  
25          Africa when you went to South Africa

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1                   HIGHLY CONFIDENTIAL AEO

2           on that occasion in 2007, correct?

3           A.        Correct.

4           Q.        What did you do while you  
5           were in South Africa in February of  
6           2007?

7           A.        Spend time with my family.

8           Q.        Anything else?

9           A.        I spent time with my family,  
10          that's -- that's it.

11          Q.        Did you visit any modeling  
12          agencies?

13          A.        Yes, I did visit some  
14          modeling agencies.

15          Q.        Which modeling agencies did  
16          you visit?

17          A.        I can't remember the exact  
18          names. The modeling agencies were on  
19          Long Street in Cape Town. I visited  
20          several modeling agencies on Long  
21          Street, and Bree Street as well. Bree  
22          Street and Long Street and a few  
23          others in central Cape Town. So I  
24          visited a few, actually.

25          Q.        Had you worked with any of



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1                   HIGHLY CONFIDENTIAL AEO

2       those modeling agencies in the past?

3           A.       No.

4           Q.       Did you have any connections  
5       with any of those modeling agencies?

6           A.       No.

7           Q.       Did you have an agent at  
8       that time?

9           A.       No.

10          Q.       What did you do when you  
11       visited the modeling agencies in Cape  
12       Town in February of 2007?

13          A.       I was requested to look for  
14       a PA for Mr. Epstein.

15          Q.       What does that mean?

16          A.       It means that he told me he  
17       would pay me a certain amount of money  
18       to find him a PA in South Africa.

19          Q.       What do you understand the  
20       initials PA to stand for?

21          A.       Personal assistant.

22          Q.       What are the job  
23       responsibilities of a personal  
24       assistant?

25          A.       To book flights, type, do

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1                   HIGHLY CONFIDENTIAL AEO  
2           faxes.   Basically a PA is your -- a  
3           CEO's right-hand man of, you know,  
4           company's -- anything business-wise.  
5           They do everything, really, for that  
6           person.

7           Q.        When did Jeffrey ask you to  
8           find him a PA while in South Africa?

9           A.        Before I went.

10          Q.        Did you agree to do that?

11          A.        Yes.

12          Q.        And you did go to the  
13          modeling agencies?

14          A.        I told Jeffrey I did, but I  
15          actually -- I went to a couple and  
16          then I just -- it wasn't right. My  
17          gut instinct was -- yeah.

18          Q.        What happened when you went  
19          inside the modeling agencies in Cape  
20          Town?

21          A.        I was humiliated. I was  
22          completely embarrassed. I couldn't  
23          even ask them what Jeffrey was  
24          wanting. I mean, it was so absolutely  
25          ridiculous, his request of me finding

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1                   HIGHLY CONFIDENTIAL AEO

2       him a PA.

3           Q.       So what happened?

4           A.       So I -- I asked if they had  
5       any girls that would want to travel;  
6       they would be put up in accommodation  
7       and they would be a PA.

8                   And when I actually spoke to  
9       the modeling agencies, they actually  
10      laughed at me, because it was quite  
11      ridiculous that a young 22-year-old  
12      was asking a modeling agencies for a  
13      18-year-old PA for a multi-billionaire  
14      who had several already.

15          Q.       So you recall a conversation  
16      where the person you were speaking to  
17      started laughing?

18          A.       Yes.

19          Q.       What type of person were you  
20      describing that you were looking for?

21          A.       The same specifications that  
22      Jeffrey told me: She had to be 18,  
23      thin, very young looking, pretty.

24          Q.       Anything else?

25          A.       Well, bright and able to

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1 HIGHLY CONFIDENTIAL AEO

2 type.

3 Q. Did you go on a diet while  
4 you were in South Africa?

5 A. I was forced to go on a  
6 diet.

7 Q. Tell me what you mean by  
8 forced to go on a diet.

9 A. After that incident on the  
10 island in -- it was December, when  
11 Ghislaine brought me back to the main  
12 house after she -- she sent a search  
13 party. She led a search party to find  
14 me on the island and bring me back.

15 Q. Ghislaine led a search  
16 party?

17 A. Yeah, yeah, yeah. She got  
18 everyone together and they all went  
19 looking for me when I disappeared.

20 Q. Who went looking for you?

21 A. Jean Luc, Jeffrey, the  
22 girls, Ghislaine.

23 Q. Which girls?

24 A. [REDACTED] and [REDACTED] the girl  
25 named [REDACTED]

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did Jeffrey go searching for  
3 you?

4 A. Yes.

5 Q. How do you know that?

6 A. I was told.

7 Q. About whom?

8 A. By [REDACTED] and the other  
9 girl.

10 Q. Where were you located?

11 A. On the island.

12 Q. Where on the island?

13 A. A corner of the island.

14 Q. On the water?

15 A. No. It was quite a long  
16 drop off the -- it was like a  
17 cliff-type -- I wasn't able to jump or  
18 get in the water.

19 Q. Your intent was to swim off  
20 the island, but you didn't make it  
21 into the water?

22 A. No, because I would have  
23 killed myself, so it wasn't safe.

24 Q. So who located you on this  
25 corner of the island?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I can't remember who got to  
3 me first. I remember the -- I can't  
4 remember who found me first.

5 Q. Do you remember anyone who  
6 found you?

7 A. Yes, I was definitely found  
8 because I didn't have enough time to  
9 find a different location on the  
10 island so I could get off and swim  
11 away from Jeffrey and Ghislaine.

12 Q. Once they found you, what  
13 happened?

14 A. I was brought back to the  
15 main house.

16 Q. How were you brought back?

17 A. The same way that I got  
18 there, on the, like, beach buggy,  
19 black 4-by-4, not -- what are they.  
20 Quad things.

21 MS. MCCAWLEY: Quad bikes?

22 A. Quad bikes, yeah.

23 Q. Did you bike back?

24 A. Yes.

25 Q. Accompanied by some people?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I was accompanied back, yes.

3 Q. By whom?

4 A. I can't remember  
5 specifically who it was.

6 Q. Okay. And once you got  
7 back, what happened?

8 A. They tried to calm me down.

9 Q. And then what happened?

10 A. From that evening onwards, I  
11 was -- Jeffrey put me on the Atkins  
12 Diet.

13 Q. Did you calm down?

14 A. Yes, I did.

15 Q. Did you take some more  
16 medications?

17 A. No. When you're on  
18 prescription drugs, you only take them  
19 at a specific required time.  
20 Generally you don't take more than  
21 your prescription when you're on  
22 prescription drugs, so you don't kind  
23 of just throw tablets in your mouth.  
24 You kind of just take them in the  
25 morning or --

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       I asked a bad question.

3           A.       Yeah.

4           Q.       You said earlier that the  
5   prescriptions were causing you to gain  
6   weight, I thought you said.

7           A.       Yes.

8           Q.       And then you just said you  
9   were put on a diet after this event,  
10   correct?

11          A.       Yes.

12          Q.       And what do you mean by you  
13   were put on a diet?

14          A.       Jeffrey said, you either go  
15   on the Atkins Diet, or I can go.

16          Q.       Go meaning off the island?

17          A.       As in, don't call me back,  
18   Sarah.

19          Q.       Here's the question: Did  
20   you discontinue the medications at the  
21   same time you went on the Atkins Diet?

22          A.       No.

23          Q.       And how long were you on the  
24   Atkins Diet?

25          A.       Long enough for my kidneys



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1                   HIGHLY CONFIDENTIAL AEO  
2           to be incredibly painful and for me to  
3           no longer continue on the diet because  
4           it was unsafe to do so.

5           Q.       Did you seek medical help  
6           for that pain?

7           A.       I just took painkillers.

8           Q.       What painkillers did you  
9           take?

10          A.       I can't remember what  
11          painkillers.

12          Q.       Prescription or  
13          over-the-counter?

14          A.       Over-the-counter.

15          Q.       Were you on the diet for  
16          more than a week?

17          A.       Yes, I was.

18          Q.       More than a month?

19          A.       Yes.

20          Q.       More than two months?

21          A.       I can't remember.

22          Q.       Were you on the diet the  
23          whole time you were in South Africa?

24          A.       Yes.

25          Q.       Did you continue on the diet

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1 HIGHLY CONFIDENTIAL AEO

2 after you returned?

3 A. Yes.

4 Q. What was the lowest weight  
5 that you reached during that period of  
6 time on the diet?

7 A. 56 kilograms.

8 Q. Had you ever weighed  
9 56 kilograms in your adult life --

10 A. No.

11 Q. -- previously?

12 A. No.

13 Q. Have you since?

14 A. No.

15 Q. Did you speak to Jeffrey  
16 again about that diet?

17 A. Multiple times.

18 Q. What did you say?

19 A. I complained frequently  
20 about the diet that he had put me on,  
21 because it was seriously affecting my  
22 physical health as well as my mental  
23 health. Yeah, it's a pretty hectic  
24 diet.

25 Q. The time you were on this

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1 HIGHLY CONFIDENTIAL AEO

2 diet, did you have a boyfriend?

3 A. Oh, yeah. Yes.

4 Q. Who was your boyfriend at  
5 the time?

6 A. Adam.

7 Q. Ralph?

8 A. That's Andy Ralph. This is  
9 Adam.

10 Q. What's Adam's last name?

11 A. I think it's Castellani.

12 Q. Where did he live?

13 A. In the Upper East Side.

14 Q. Did you talk to Adam about  
15 your diet?

16 A. Yes.

17 Q. Were you living with Adam?

18 A. Not at -- not when I was in  
19 South Africa.

20 Q. When you returned from South  
21 Africa, did you move in with Adam?

22 A. Yes, I did, to get away from  
23 Jeffrey.

24 Q. And where on the Upper East  
25 Side did Adam live?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I can't remember.

3 Q. Walkup or elevator building?

4 A. Elevator.

5 Q. How big was that apartment?

6 A. It's relatively small.

7 Q. More than one bedroom?

8 A. No, it was just one bedroom.

9 It was a small, tiny apartment.

10 Q. And what did Adam do for a  
11 living?

12 A. He was a banker.

13 Q. Where did he work?

14 A. He worked at -- I can't  
15 remember where he worked.

16 Q. How did you meet Adam?

17 A. At a delicatessen, when I  
18 was buying food.

19 Q. Had you started dating him  
20 before you went to South Africa?

21 A. I think we had gone on a  
22 couple dates or something.

23 Q. Where had you gone on your  
24 dates?

25 A. I can't remember.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. When you were in South  
3 Africa, did you have contact with  
4 Adam?

5 A. Once or twice, like three  
6 times. Well, we were sort of seeing  
7 each other, so I don't know how many  
8 phone times I spoke to him in a month.  
9 Yeah, a few times I spoke to Adam.

10 Q. When you spoke to him, did  
11 he ask you to move in with him when  
12 you returned?

13 A. I wouldn't really say that.  
14 I wouldn't really say he asked me to  
15 move in.

16 Q. Okay. What would you say?

17 A. I asked him for me to move  
18 in with him.

19 Q. Okay. While you were in  
20 South Africa, did you receive any  
21 phone calls from Jeffrey?

22 A. Yes.

23 Q. Did you want Jeffrey to call  
24 you there?

25 A. Yes. He was helping me get

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1 HIGHLY CONFIDENTIAL AEO

2 into FIT.

3 Q. Any other reason for you to  
4 have communications while you were in  
5 South Africa?

6 A. I was living in his  
7 apartment.

8 Q. In South Africa?

9 A. In New York.

10 Q. So you wanted to have  
11 communications with Jeffrey while you  
12 were in South Africa because you were  
13 living in his apartment in New York?

14 MS. MCCAWLEY: Objection.

15 A. And he was going to -- he  
16 promised that he would pay for my  
17 education. And I was staying in his  
18 apartment and he was funding my life,  
19 so of course I would want him to  
20 contact me.

21 And, also, he was still --  
22 he told me he would pay for my return  
23 ticket. So, yeah, of course I wanted  
24 him to contact me.

25 (An off-the-record

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1 HIGHLY CONFIDENTIAL AEO

2 discussion was held.)

3 Q. Did you have an intention  
4 while you were in South Africa to go  
5 to Miami upon your return?

6 A. I think there was a vague  
7 conversation about it, but I had no  
8 real intention of going to Miami. I  
9 had a conversation with Natalya about  
10 it.

11 Q. What, if anything, were you  
12 going to do in Miami?

13 A. I can't remember.

14 Q. Did you have a job lined up  
15 in Miami?

16 A. I can't remember.

17 Q. An internship?

18 A. It was something to do with  
19 Jeffrey, that Jeffrey, Natalya and --  
20 it would have -- it would have -- it  
21 was through Jeffrey, something with  
22 Miami. I can't remember what it was  
23 for or -- I don't remember. It  
24 didn't -- it was just a conversation  
25 about Miami.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. So not a real firm plan to  
3 go to Miami?

4 A. No, no.

5 Q. Were you disappointed when  
6 you didn't go to Miami?

7 A. No, no, not at all.

8 Q. And you weren't planning to  
9 be a model in Miami, for example?

10 A. No.

11 Q. You said that Jeffrey had  
12 agreed to pay for your education?

13 A. Yes.

14 Q. Did you apply to any other  
15 school besides FIT?

16 A. No.

17 Q. Do you know whether you met  
18 the qualifications to get into FIT?

19 MR. GUIRGUIS: Objection,  
20 form.

21 A. Yes.

22 MR. GUIRGUIS:  
23 Comprehensibility.

24 MS. MENNINGER: She seemed  
25 to understand it just fine.



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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: I don't know  
3 if she did, but fine.

4 Q. Do you know how much FIT was  
5 supposed to cost per year?

6 A. No.

7 Q. Did you believe it to be  
8 expensive?

9 A. All schools are expensive.

10 Q. You had previously attended  
11 Queen Margaret College; is that right?

12 A. Queen Margaret University.

13 Q. My apologies.

14 How much did Queen Margaret  
15 University cost?

16 A. I can't remember.

17 Q. Did you apply for any  
18 financial aid for FIT?

19 A. No. Jeffrey was covering  
20 FIT.

21 Q. That's what Jeffrey told  
22 you?

23 A. Multiple, multiple times.

24 Q. Did Ghislaine Maxwell say  
25 anything to you with regards to FIT?

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1 HIGHLY CONFIDENTIAL AEO

2 A. It was various  
3 conversations. It was known among  
4 everyone that I was going to FIT, and  
5 Jeffrey -- everyone knew he was  
6 helping me to get into FIT. It was  
7 common knowledge.

8 Q. You described earlier that  
9 Ghislaine was helping review your  
10 application and your essay.

11 Was there something else  
12 that she was doing to help you?

13 A. Well, she said she would,  
14 but whether she did, I have no idea.  
15 She said she would. Whether she made  
16 calls, I doubt, because I didn't end  
17 up at FIT. So...

18 Q. Did you get accepted there?

19 A. I never heard from anyone at  
20 FIT.

21 Q. You never got a response?

22 A. No.

23 Q. Did you have an email  
24 address at that time?

25 A. Yes, I did.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you have a copy of your  
3 FIT application?

4           A.       I think it's somewhere. I  
5 think it's in the email.

6           Q.       There's an essay and then  
7 there's an application, correct?

8           A.       Yes, that's correct. I can  
9 find the essay if you want.

10                   MR. GUIRGUIS: I think we've  
11 already produced that essay.

12           Q.       While you were in South  
13 Africa, did you have any phone  
14 conversation with Ghislaine?

15           A.       Yes.

16           Q.       When was that?

17           A.       Through various times  
18 throughout my stay in South Africa.

19           Q.       What phone were you using  
20 while you were in South Africa?

21           A.       I had the BlackBerry that  
22 they had given me, and they also  
23 phoned my parents' landline as well.

24           Q.       Who is they?

25           A.       Jeffrey, Ghislaine and

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1 HIGHLY CONFIDENTIAL AEO

2 Lesley Groff.

3 Q. Did Ghislaine speak to your  
4 parents?

5 A. Yes.

6 Q. Who did she speak to?

7 A. I can't remember if she  
8 spoke -- I can't remember, actually.  
9 I can't remember who she spoke to.

10 Q. How do you know that she  
11 spoke to your parents?

12 A. Because I remember it being  
13 a huge thing, and my family -- because  
14 they couldn't quite understand what  
15 Jeffrey and Ghislaine were doing  
16 paying for their daughter's education,  
17 and they obviously thought --  
18 suspected something was going on.

19 Q. So how do you know that  
20 someone spoke to your parents?

21 A. Because my parents and I  
22 fought about it.

23 Q. Did your parents tell you  
24 that they spoke to Ghislaine?

25 A. I -- I can't remember. I

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1                   HIGHLY CONFIDENTIAL AEO  
2       remember having a huge row with my  
3       family because they had spoken to --  
4       so there were multiple phone calls  
5       during the duration of that month,  
6       okay. There's not a specific call.  
7       There were multiple calls.

8                   There were multiple emails.  
9       I produced emails during that time  
10      frame, back-and-forth emails between  
11      Lesley Groff and myself. So they  
12      were -- they contacted me regularly.  
13      Ghislaine, Lesley Groff and Jeffrey  
14      Epstein phoned me a few times.

15           Q.       Did your parents tell you  
16      that they spoke to Ghislaine?

17           A.       I knew with my own -- that  
18      they had spoken to Ghislaine.

19           Q.       How did you know that?

20           A.       Because I know that they had  
21      spoken. They told me that they had  
22      spoken. I know she made communication  
23      with my family.

24           Q.       Your family told you that  
25      they had spoken to Ghislaine?

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2                   MR. GUIRGUIS: Objection,  
3                   asked and answered.

4                   A.           Yes.

5                   Q.           Who in your family told that  
6                   you they had spoken to Ghislaine?

7                   A.           I can't remember whether it  
8                   was my stepmother or my father. I  
9                   cannot remember which one it was.

10                  Q.           What did your stepmother or  
11                  father tell you they had discussed  
12                  with Ghislaine?

13                  A.           That she had reassured them  
14                  that my education would be paid for  
15                  and -- basically that. You know, they  
16                  spent a lot of time and effort  
17                  reassuring my family they weren't  
18                  abusing me, which they were, and that  
19                  they weren't going to traffic me,  
20                  which they were.

21                                So there you go. I had to  
22                                lie to my family.

23                  Q.           What is your stepmother's  
24                  name?

25                  A.           Linda Ransome.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. And do you have an email  
3 address or phone number for her?

4 A. No, I don't.

5 MR. GUIRGUIS: Objection.  
6 No current information. Same  
7 objection as at the outset of  
8 deposition.

9 MS. MENNINGER: Are you  
10 instructing her not to answer?

11 MR. GUIRGUIS: I am  
12 instructing her not to answer.

13 Q. Where does Linda --

14 MR. GUIRGUIS: And I'm again  
15 offering you to the opportunity  
16 to proffer a reason for these  
17 questions. And I --

18 MS. MENNINGER: I'll tell  
19 you. Your client has signed an  
20 affidavit and a complaint  
21 discussing this conversation, and  
22 I'm asking for contact  
23 information for a witness to the  
24 conversation, the person who  
25 actually supposedly had a phone

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1                   HIGHLY CONFIDENTIAL AEO  
2           conversation with my client. And  
3           you're telling me I can't follow  
4           up with those witnesses.

5           Q.       So please tell me how to  
6           reach your stepmother, Linda Ransome.

7           A.       I'm not going to offer you  
8           my family's address details.

9                   MR. GUIRGUIS: You don't  
10          have to answer.

11                   Go on.

12                   MS. MENNINGER: You may come  
13          back and answer it another day,  
14          but...

15          Q.       Where does Linda Ransome  
16          live?

17          A.       She lives in Cape Town.

18          Q.       Where in Cape Town?

19          A.       I don't know.

20          Q.       Have you been in touch with  
21          her?

22          A.       Not recently, no.

23          Q.       When is the last time you  
24          communicated with her?

25          A.       A while back.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. More than a year?

3 A. Less than a year.

4 Q. Is she still married to your  
5 father?

6 A. I presume so.

7 Q. Have you talked to him in  
8 the same period of time?

9 A. No.

10 Q. Why haven't you talked to  
11 your family in more than a year?

12 MS. MCCAWLEY: Objection.  
13 This is getting into her current  
14 relationships, which is not  
15 relevant to the case and also can  
16 be used for harassment.

17 Q. Why haven't you talked to  
18 your family in a year?

19 A. Because I came forward.

20 Q. When did you come forward?

21 A. October, around October.

22 Q. Have you spoken to your  
23 family since October?

24 A. No.

25 Q. When was the last time you

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1                   HIGHLY CONFIDENTIAL AEO  
2 spoke to your father or stepmother  
3 before October?

4           A.       September.

5           Q.       And did you tell them not to  
6 contact you or did they tell you not  
7 to contact them?

8           A.       Well, I didn't -- I  
9 basically said to them, either accept  
10 me for who I am or we need to stop  
11 this relationship.

12          Q.       What did you mean by accept  
13 you as you are?

14          A.       I've made a lot of poor  
15 choices, particularly Jeffrey, being  
16 involved with Jeffrey Epstein. And  
17 they feel I've come a long way from  
18 that time, and they thought that they  
19 didn't want me going back to a time  
20 that was very traumatic for me.

21          Q.       Did they tell you they would  
22 not be in touch with you going  
23 forward?

24          A.       I didn't give them that  
25 option for them to tell me that.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. So your not having a  
3 conversation with your father and  
4 stepmother in a year is because of  
5 your choice to come forward?

6 A. That's correct.

7 Q. What about your mother?

8 MR. GUIRGUIS: Objection to  
9 form.

10 A. What about my mother?

11 Q. Have you had contact with  
12 her in a year?

13 A. Yes.

14 Q. When was the last time you  
15 had contact with your mother?

16 A. Last week.

17 Q. When you returned to New  
18 York and moved in with Adam, did you  
19 talk to Adam about Jeffrey Epstein?

20 A. Yes.

21 Q. What did you tell Adam?

22 A. I told him that I was  
23 frightened.

24 He was incredibly concerned  
25 about my weight loss and about the

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1                   HIGHLY CONFIDENTIAL AEO  
2           weight goal that Jeffrey and Ghislaine  
3           set for me, which was 52 kilograms.  
4           He was scared for me, actually.

5           Q.        To your knowledge, did he  
6           contact anyone about it?

7           A.        Not to my knowledge.

8           Q.        What did he do about his  
9           concern, to your knowledge?

10          A.        I begged him if I could live  
11          with him, and he agreed.

12          Q.        How long did you live with  
13          him?

14          A.        It wasn't really long,  
15          because I moved in with him after  
16          South Africa. So about a month or  
17          something.

18          Q.        From the time you returned  
19          from South Africa to when you returned  
20          to South Africa?

21          A.        Oh. Yeah, no, we only kind  
22          of went -- we only dated for briefly.  
23          It wasn't a serious relationship.  
24          Yeah. So when I moved to New York --  
25          sorry, back to London, kind of our

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1                   HIGHLY CONFIDENTIAL AEO  
2           relationship couldn't really go  
3           anywhere, I guess.

4           Q.        The long distance?

5           A.        Yeah, long distance doesn't  
6           really work, so...

7           Q.        So about the time you moved  
8           back to London is when you and he  
9           broke up?

10          A.        That's correct.

11          Q.        Have you had contact with  
12          him since then?

13          A.        I had contact with him again  
14          in 2008.

15          Q.        Did you come back to the  
16          U.S. then?

17          A.        No.

18          Q.        You did not come back to the  
19          U.S. in 2008?

20          A.        Oh, I did, sorry, for a  
21          business trip. I went -- I did a  
22          tour, yeah, from -- I think it was  
23          Atlantic to Atlanta to San Francisco.

24          Q.        With which business?

25          A.        Belfairs International.

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1 HIGHLY CONFIDENTIAL AEO

2 It's a private company at that time  
3 that did private planes, the interiors  
4 of private planes.

5 (An off-the-record  
6 discussion was held.)

7 Q. One more time. Can you  
8 spell that?

9 A. Sorry. B-A-R- -- sorry, B-  
10 -- sorry. It's getting so bad. I'm,  
11 like, really bad at spelling. It's  
12 B-E-L-F-A-I-R-S, Belfairs  
13 International.

14 Q. You were working with them  
15 in 2008?

16 A. Briefly.

17 Q. And you came for a business  
18 trip?

19 A. Yes.

20 Q. And how long were you in the  
21 U.S. on that occasion?

22 A. Gosh, I can't remember. It  
23 was like a week.

24 Q. And who did you come with?

25 A. My manager of business.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. What was that person's name?

3 A. David.

4 Q. What's the last name?

5 A. I can't remember the last  
6 name.

7 Q. So you came back to the U.S.  
8 in 2008, but you did not have contact  
9 with Adam on that trip?

10 A. No.

11 Q. When did you have contact  
12 with Adam in 2008?

13 A. He moved to London in 2008.

14 Q. Did you see him in London?

15 A. Yes, I did.

16 Q. Where did you see him?

17 A. He came to stay with me in  
18 London.

19 Q. Did you resume your  
20 relationship?

21 A. Briefly.

22 Q. Is that the last time you've  
23 had contact with him?

24 A. Yes.

25 Q. Was that about the time you

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1                   HIGHLY CONFIDENTIAL AEO

2       became engaged to --

3           A.       Andy.

4           Q.       -- Andy?

5           A.       Andy and I got together at  
6       the end of 2008. We didn't meet and  
7       then get engaged immediately. It was  
8       like we dated and then got engaged.

9           Q.       Understood.

10           In addition to discussing  
11       Jeffrey with Adam, is there someone  
12       else you discussed Jeffrey with in  
13       your life in 2006 or 2007?

14           A.       Well, I discussed it with  
15       everyone I knew. It's quite an amaz-  
16       -- he's an amazing man. Yeah,  
17       everyone I knew knew that I was  
18       involved with Jeffrey Epstein.  
19       Everyone that I met in New York knew  
20       that I was affiliated with Jeffrey  
21       Epstein and Ghislaine Maxwell.

22           Q.       More specifically, who did  
23       you tell that you had concerns about  
24       your relationship with Jeffrey?

25           A.       My friend Pam. And there



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1                   HIGHLY CONFIDENTIAL AEO  
2           were a few other friends I had at the  
3           time, but I don't remember their  
4           names.

5           Q.       Did you discuss it with  
6           Pumla?

7           A.       Yes.

8           Q.       What did you tell Pumla?

9           A.       Everything that Jeffrey did  
10          to me. I told her every single detail  
11          on how he abused me.

12          Q.       How did Jeffrey abuse you?

13          A.       There were times that I was  
14          -- I mean, look, I was intimidated. I  
15          was frightened of Jeffrey, okay. I  
16          wanted to go to FIT, get an education.  
17          But if I didn't comply with Jeffrey's  
18          requests, I was scared. Okay?

19                   So how did he abuse me?  
20          When he had me on, like, the massage  
21          table, I had no option. So how did he  
22          abuse me? By putting a vibrator and  
23          pushing it down on my clitoris for ten  
24          minutes, that's abuse. That was not  
25          pleasurable; that was exceptionally

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1 HIGHLY CONFIDENTIAL AEO

2 painful. He hurt me physically and he  
3 abused me mentally, both.

4 Q. How did he abuse you  
5 mentally?

6 A. Jeez. Well, I think the  
7 fact that -- A, physical abuse always  
8 leads to mental abuse. It's a fact.  
9 So you can't physically abuse someone  
10 and they can't be mentally, because  
11 they will -- without a doubt, I'm sure  
12 myself and all the other girls will  
13 have suffered some form of  
14 posttraumatic stress.

15 So in terms of how did he  
16 mentally abuse me? He bullied me. He  
17 went on about my weight. He  
18 intimidated me. He promised me things  
19 he didn't deliver. I mean, I could go  
20 on. So...

21 Q. What things did he promise  
22 you that he didn't deliver?

23 A. An education.

24 Q. And what do you know about  
25 what he did or didn't do to get you an

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1 HIGHLY CONFIDENTIAL AEO

2 education?

3 A. Well, I didn't go to FIT, so  
4 I presume not very much.

5 Q. Do you know why you didn't  
6 get into FIT?

7 A. No, no. It just didn't ever  
8 materialize.

9 Q. Did you ever contact FIT to  
10 find out?

11 A. During that time, Jeffrey  
12 had it in hand. I didn't think I  
13 needed to contact anybody at FIT. I  
14 mean, Jeffrey -- it was Jeffrey's  
15 contact in the first place that he was  
16 contacting. So I didn't contact  
17 anyone at FIT.

18 Q. You didn't contact them at  
19 all?

20 A. Well, no, because Jeffrey  
21 said that he was going to do that for  
22 me to get me into FIT.

23 Q. And how did you ever confirm  
24 or deny that you weren't admitted to  
25 FIT?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I was never told. I was  
3 never given a letter. I didn't have  
4 anyone phone me. I didn't have the  
5 contact that Jeffrey had been speaking  
6 to about getting me in. She didn't  
7 contact me. So I'm presuming as an  
8 educated woman it was all hearsay,  
9 because nothing ever materialized from  
10 that.

11 Q. Did FIT have your address at  
12 Adam's?

13 A. Not that I recall.

14 Q. Did you give Jeffrey your  
15 address at Adam's?

16 A. Yes, Jeffrey knew where I  
17 lived.

18 Q. I understood you were going  
19 to live with Adam in order to get away  
20 from Jeffrey.

21 A. So when -- so basically when  
22 you live in someone's apartment, it's  
23 a form of control. So when you don't  
24 comply with their instructions all the  
25 time, hundred percent, it's like

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1 HIGHLY CONFIDENTIAL AEO  
2 leverage for them to control you.

3 I don't like being  
4 controlled by people, especially by  
5 someone like Jeffrey Epstein and  
6 Ghislaine Maxwell.

7 So Jeffrey Epstein, he knew  
8 where I was all the time, so...

9 Q. Did Jeffrey come to Adam's  
10 apartment?

11 A. He came around the Upper  
12 East Side near the apartment, yes, he  
13 did. There was an occasion that  
14 Jeffrey Epstein picked me up when I  
15 didn't go to the mansion.

16 Q. Picked you up where?

17 A. I can't remember the  
18 location.

19 Q. Jeffrey lived on the Upper  
20 East Side?

21 A. I can't remember where  
22 Jeffrey -- his exact location is. I  
23 mean, it's a nice -- I think it's near  
24 5th. It's near 5th Avenue.

25 Q. Was it on the Upper East

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1 HIGHLY CONFIDENTIAL AEO

2 Side?

3 A. I think. I don't think it  
4 was on the West Side. So hang on. So  
5 5th Avenue is there. Is the West Side  
6 that side?

7 I don't know -- sorry. I'm  
8 really -- I'm a tourist, so I don't  
9 know. I don't know where Jeffrey -- I  
10 know that he's got -- it was near 5th  
11 Avenue. That's where I know his  
12 apartment was.

13 I'm not a New Yorker, so...

14 Q. Do you recall an occasion  
15 while you were living with Adam that  
16 Jeffrey came and picked you up?

17 A. Yes.

18 Q. Somewhere on the Upper East  
19 Side?

20 A. Yes.

21 Q. You don't know where?

22 A. No, I don't know the  
23 specific street, name or pavement that  
24 I was standing on, no, I don't.

25 Q. Where did you go with

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1                   HIGHLY CONFIDENTIAL AEO

2       Jeffrey when he picked you up on the  
3       Upper East Side?

4           A.       I got in his car and went  
5       back to his mansion.

6           Q.       What kind of car was it?

7           A.       It was a -- I can't remember  
8       what car it was.

9           Q.       Who was driving the car?

10          A.       He wasn't driving. I can't  
11       remember who was driving.

12          Q.       Was anyone else in the car?

13          A.       Someone was driving the car.

14          Q.       Anyone else?

15          A.       I can't remember anyone  
16       else.

17          Q.       What was the purpose of your  
18       going back to the mansion on that  
19       occasion?

20          A.       I don't know. You're going  
21       to have to ask Jeffrey.

22          Q.       Why did you get in the car?

23          A.       Because I was frightened.

24          Q.       What were you frightened of?

25          A.       The fact that he had found

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1                   HIGHLY CONFIDENTIAL AEO  
2           me and wasn't supposed to know where I  
3           was. So I was incredibly intimidated  
4           that he drove up beside me and knew  
5           where I was.

6           Q.        You were somewhere out on  
7           the street visible and he found you?

8           A.        No. I was supposed to meet  
9           Jeffrey. I was instructed to meet  
10          Jeffrey. I failed to turn up to meet  
11          Jeffrey and Jeffrey found me.

12          Q.        Who instructed you to meet  
13          Jeffrey?

14          A.        It was one of the girls. It  
15          was either Sarah Kellen or Lesley  
16          Groff.

17          Q.        How did they instruct you to  
18          meet Jeffrey?

19          A.        Via the BlackBerry they gave  
20          me.

21          Q.        You kept the BlackBerry  
22          after you returned from South Africa?

23          A.        Yes, I did.

24          Q.        While you were living with  
25          Adam?



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1 HIGHLY CONFIDENTIAL AEO

2 A. Yes.

3 Q. Why did you keep the  
4 BlackBerry after you were living with  
5 Adam?

6 A. Because Jeffrey and I were  
7 still in contact.

8 Q. What were you in contact  
9 about? The FIT application?

10 A. He was trying to get me a  
11 visa, and he -- he devised a way of me  
12 getting -- I don't know what you call  
13 it, sorry -- an apprenticeship, an  
14 internship with a cosmetic company.  
15 Yeah, a cosmetic agency, doctor's  
16 medical facility.

17 Q. When you came back from  
18 South Africa in February of 2007, did  
19 you have a tourist visa?

20 A. Yeah, yes.

21 Q. So Jeffrey was trying to  
22 help you get a job so you could get a  
23 different kind of visa?

24 A. Yeah. Well, you can't live  
25 in New York on a tourist visa. It's

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1                   HIGHLY CONFIDENTIAL AEO  
2       three months, so -- so I don't know  
3       what it's like anymore, the laws. But  
4       back then, if you wanted to tour  
5       America, you would go and fill -- I  
6       think it was 90 days, but then you  
7       would have to leave. You couldn't  
8       stay.

9                   And Jeffrey was trying to  
10       get me a -- it's difficult, not  
11       being -- it's difficult actually going  
12       to university here if you don't have a  
13       British -- I don't know the system. I  
14       just didn't have a visa I could go to  
15       FIT.

16                  And this friend of his that  
17       owned a cosmetic surgery, he had  
18       organized that I would go in and do an  
19       internship, and that way would be a  
20       legitimate way to -- for me to get a  
21       visa, for me to stay and continue in  
22       FIT. If that makes sense.

23           Q.       What was the name of that  
24       friend?

25                  MR. GUIRGUIS: Do you need a

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1 HIGHLY CONFIDENTIAL AEO

2 break?

3 THE WITNESS: I do, sorry.

4 Do you mind?

5 MS. MENNINGER: There was a  
6 question pending.

7 MR. GUIRGUIS: She has a  
8 question pending. You can answer  
9 that, then. Go ahead.

10 What was the name of that  
11 friend?

12 THE WITNESS: I don't know.  
13 It was a man.

14 Q. Did you end up working in  
15 that internship?

16 A. No.

17 Q. Did you ever meet with that  
18 man?

19 A. Yes.

20 Q. Why didn't you end up  
21 working in that internship with that  
22 man?

23 A. I wanted to return home.

24 MR. GUIRGUIS: Can we take  
25 that break?

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MENNINGER: Yes.

3 (Time noted: 3:04 p.m.)

4 (Recess.)

5 (Time noted: 3:20 p.m.)

6 MS. MENNINGER: Going back  
7 on the record.

8 MR. GUIRGUIS: Before you  
9 proceed with your questions,  
10 Counsel, I raised an objection to  
11 providing Linda Ransome's email  
12 address before. Then you  
13 proffered a reason for it.

14 I accept your proffer and I  
15 will provide you that email  
16 address now, or have the witness  
17 do it.

18 MS. MENNINGER: Okay.

19 THE WITNESS: It's

20

21 (An off-the-record  
22 discussion was held.)

23 MR. GUIRGUIS: And let the  
24 record reflect she's taking it  
25 down from a Google search on the

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1 HIGHLY CONFIDENTIAL AEO

2 web. She believes that's right.

3 Q. What is your father's email  
4 address?

5 A. I don't remember it offhand.

6 MS. MENNINGER: Can you mark  
7 this.

8 (Defendant's Exhibit 3,  
9 affidavit, was marked for  
10 identification.)

11 Q. Do you recognize the  
12 document we marked as Defendant's  
13 Exhibit 3?

14 A. Yes.

15 Q. What is it?

16 A. My affidavit.

17 Q. Who wrote this affidavit?

18 A. Well, I -- I -- I didn't  
19 type it up, but I gave the affidavit.

20 Q. So you spoke words to  
21 someone else and they typed it?

22 A. Yes.

23 Q. Who was that person?

24 A. I don't know.

25 Q. Who was the person you gave

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1 HIGHLY CONFIDENTIAL AEO

2 words to?

3 MR. GUIRGUIS: Was it an  
4 attorney?

5 THE WITNESS: Yes.

6 MR. GUIRGUIS: Okay.

7 Q. Which attorney?

8 MR. GUIRGUIS: I think I'm  
9 going to object to that. I don't  
10 know that it matters which  
11 attorney or which attorney  
12 provided the work or did specific  
13 tasks. I think that's  
14 privileged.

15 Q. Did you communicate these  
16 words to a attorney with the intent  
17 that they would put it into an  
18 affidavit that you would share  
19 publicly?

20 A. I don't know that the  
21 affidavit is public, but to share  
22 with -- with you guys.

23 Q. With a third party?

24 A. Yeah, with a third party.

25 Q. And you knew that at the

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1 HIGHLY CONFIDENTIAL AEO

2 time you were giving the words to the  
3 person to type up?

4 A. Yeah, to give to you guys.

5 Q. So who was the person that  
6 you were speaking to that took down  
7 the words for your affidavit?

8 A. Sorry. It was Stan and  
9 Brad.

10 Q. And when did you have that  
11 conversation with them?

12 A. I think it was either -- I  
13 think it was in January.

14 Q. Last month?

15 A. Oh, God. Last month. Yeah,  
16 last month.

17 Q. In person?

18 A. In person.

19 Q. Did they give you multiple  
20 drafts of this document?

21 A. I wouldn't say multiple, but  
22 I made sure that it was accurate.

23 Q. Did you make any changes to  
24 the document you were originally  
25 presented with?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       The first document that you  
4 were presented with, is that the one  
5 that you signed?

6           A.       Yes.

7           Q.       And nothing was changed  
8 after you reviewed it?

9           A.       No.

10          Q.       Is that your signature on  
11 the second page?

12          A.       Yes, that is my signature.

13          Q.       And the last page, is that  
14 the official in Spain who witnessed  
15 your signature?

16          A.       Yes.

17          Q.       Did you sign page 2 in front  
18 of the person indicated on page 3?

19          A.       Yes.

20          Q.       Did you present that person  
21 with some form of identification?

22          A.       Yes.

23          Q.       What form of identification  
24 did you present?

25          A.       My passport.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. Which passport?

3 A. My British passport.

4 Q. Is that a current British  
5 passport?

6 A. Yes.

7 Q. Did you have a British  
8 passport that expired in 2014?

9 A. Yeah, I can't remember when  
10 it expired, but I think you guys have  
11 a copy as well of my passport. I  
12 don't remember the exact date that it  
13 expired.

14 Q. Not the South African  
15 passport that was stolen?

16 A. The South African passport  
17 is completely irrelevant. You can't  
18 travel on a South African passport.  
19 It's -- you can't go into any other  
20 country bar South Africa, other than  
21 South Africa, on a passport. So I've  
22 hardly used my South African passport  
23 at all.

24 Q. I'm just asking which  
25 passport you showed to the person on

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1 HIGHLY CONFIDENTIAL AEO

2 page 3.

3 A. Sorry. My British passport.

4 Q. And it's a British passport  
5 that's current?

6 A. Yes.

7 MR. GUIRGUIS: Asked and  
8 answered.

9 MS. MENNINGER: Just a bit  
10 of a detour.

11 Q. Can I have you take a look  
12 at paragraph 1?

13 A. Yep.

14 Q. Is paragraph 1 true?

15 A. "I am currently over the age  
16 of 18," paragraph 1, yes.

17 Q. And you presently reside in  
18 Spain?

19 A. Yes.

20 Q. Paragraph 2, you state, "In  
21 the summer of 2006, when I was  
22 22 years old and living in New York, I  
23 was introduced to Jeffrey Epstein by a  
24 girl I had met named Natalya  
25 Malyshev."

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1                   HIGHLY CONFIDENTIAL AEO

2                   Is that true?

3           A.        Yes.

4           Q.        Was it the summer of 2006  
5 when you met Natalya?

6           A.        Okay, well, it was summer.  
7 End of summer going into fall.

8           Q.        So when was it, do you  
9 think?

10          A.        It was fall of 2006. It was  
11 just after the summer.

12          Q.        So it was the fall of 2006  
13 when you met Natalya?

14          A.        Well, it was the end of the  
15 summer, so I don't know -- fall or in  
16 the summer or -- it was end of summer,  
17 fall.

18          Q.        Sometime after you came into  
19 the U.S.?

20          A.        Yes, yeah.

21          Q.        And do you know when in the  
22 fall of 2006 you met Natalya?

23          A.        What, you mean the end of  
24 summer/fall slash -- if you really  
25 want to go -- can you define, like,

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1 HIGHLY CONFIDENTIAL AEO

2 geography lessons? Should we do

3 geography lessons?

4 MS. MCCAWLEY: All right.

5 Hang on a second.

6 A. Maybe summer? Fall?

7 Winter? What are your dates here in

8 New York?

9 MR. POTTINGER: Can we get

10 this clear?

11 MR. PAGLIUCA: Would you

12 just stop it?

13 MR. POTTINGER: Do you mind?

14 Do you mind?

15 MR. PAGLIUCA: I mind you

16 talking.

17 MR. POTTINGER: Do you mind?

18 MS. MENNINGER: If you want

19 to enter an objection, please do

20 so.

21 MR. POTTINGER: I object.

22 MS. MENNINGER: What is the

23 basis of your objection, Mr.

24 Pottinger?

25 MR. POTTINGER: Define

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1 HIGHLY CONFIDENTIAL AEO

2 summer or fall.

3 MS. MENNINGER: I will do  
4 whatever I want during my  
5 deposition.

6 MR. POTTINGER: Define --  
7 define summer or fall.

8 MS. MENNINGER: I don't have  
9 to define anything.

10 MR. POTTINGER: Define  
11 summer or fall for the client --

12 MS. MENNINGER: All right.

13 MR. POTTINGER: -- and then  
14 we will answer the -- she will be  
15 able to answer the question.

16 MS. MENNINGER: I'm going  
17 off the record until you calm  
18 down.

19 Let's go off the record.

20 (Time noted: 3:28 p.m. )

21 (Recess.)

22 (Time noted: 3:30 p.m.)

23 MS. MENNINGER: Go back on  
24 the record.

25 Q. Approximately what month and

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1 HIGHLY CONFIDENTIAL AEO

2 day did you meet Natalya Malyshev?

3 A. As I said earlier, I can't  
4 remember what day, but it was end of  
5 summer/fall in the United States. I  
6 can't remember what specific date or  
7 time that was.

8 Q. What month? Any idea?

9 A. It was September.

10 Q. When did you meet Jeffrey  
11 Epstein?

12 A. Shortly after I met Natalya.

13 Q. Was that also in September?

14 A. I guess so. I don't know  
15 the exact date I arrived, so if  
16 someone can provide me with my  
17 passport so I can see my entry date,  
18 maybe that would help.

19 So I met Natalya -- if you  
20 look at the date that I arrived in New  
21 York on my passport, I think it's very  
22 clear when I arrived. You've got the  
23 evidence, I'm sure.

24 So two weeks after the date  
25 that is on my passport that I arrived

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1                   HIGHLY CONFIDENTIAL AEO  
2       in, I met Natalya. Very soon after I  
3       met Natalya, I was introduced to  
4       Jeffrey Epstein. It was in and around  
5       September. I can't specifically  
6       remember the date, time, season,  
7       whatever.

8           Q.       Did you show your passport  
9       to Mr. Pottinger and Mr. Edwards when  
10      you were standing there at the  
11      consulate having the affidavit  
12      notarized?

13          A.       I showed my current passport  
14      when I had this signed.

15          Q.       Not the passport that  
16      contained dates from 2006?

17          A.       My current valid passport.  
18      You can only show a valid passport.

19          Q.       Fair enough.

20                   So you believe that your  
21      lawyers have produced your current  
22      valid passport to me?

23          A.       No --

24                   MS. MCCAWLEY: Objection.

25          A.       -- they have not produced my

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1                   HIGHLY CONFIDENTIAL AEO  
2           current passport. They produced have  
3           my passport during that time frame,  
4           which clearly shows that -- when I  
5           entered the United States.

6           Q.        So when your lawyers wrote,  
7           "A copy of nonparty Sarah Ransome's  
8           current passport is attached hereto as  
9           RANSOME 157 to 168, which should be  
10          treated as confidential pursuant to  
11          the party's protective order," do you  
12          believe that to be an accurate  
13          statement?

14                   MS. MCCAWLEY: Objection.  
15           You're asking her legal  
16           information that she's not privy  
17           to.

18                   MS. MENNINGER: There was  
19           nothing legal about that comment.

20           A.        Sorry. That makes no sense  
21           to me, please. Can you repeat the  
22           question.

23           Q.        I'll do it this way.

24                   MS. MENNINGER: Defendant's  
25           Exhibit 4.



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1 HIGHLY CONFIDENTIAL AEO

2 (Defendant's Exhibit 4,  
3 RANSOME\_000168, was marked for  
4 identification.)

5 Q. Take a look at Defendant's  
6 Exhibit 4.

7 A. Okay.

8 Q. Just take a look at it. Do  
9 you recognize it?

10 A. Yeah, this is my passport.

11 Q. Do you know which passport  
12 this is?

13 A. This is my old passport.

14 Q. So it's not your current  
15 passport, correct?

16 A. No, it's not my current  
17 passport, because it expired on --  
18 let's have a look here --

19 Q. Can you turn to the  
20 second-to-last page. Sorry.

21 A. Yes, here we go.

22 Q. Does that have a Bates  
23 number? In other words, your name,  
24 RANSOME, with an underscore and then  
25 page numbers after that, that were

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1                   HIGHLY CONFIDENTIAL AEO

2       placed there by your attorneys.

3           A.        Hmm, sorry. I don't  
4       understand.

5           Q.        Do you see at the bottom of  
6       that page, your name, RANSOME\_000158?

7           A.        Yes.

8           Q.        All right. And that's on a  
9       document that is an expired passport?

10          A.        Yes.

11          Q.        This is not your current  
12       passport?

13                   MR. GUIRGUIS: Objection,  
14       asked and answered.

15          A.        No.

16          Q.        You have another passport  
17       that's not this passport that's  
18       currently in effect?

19                   MR. GUIRGUIS: Objection,  
20       asked and answered.

21          Q.        Correct?

22          A.        Yes.

23          Q.        If I could also have you  
24       take a look at -- and I'll have to  
25       show, if you can see, there are the

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1 HIGHLY CONFIDENTIAL AEO

2 passport page numbers --

3 A. Mm-hmm.

4 Q. -- that show up on a  
5 passport.

6 A. Yeah.

7 Q. And these have been put in  
8 some order.

9 A. Mm-hmm, the order of my  
10 passport, yes.

11 Q. Right. That's not how they  
12 were produced, but that's the order  
13 they're in now.

14 A. Okay.

15 Q. If we could have you turn to  
16 RANSOME 162, which is page 16 of your  
17 passport.

18 MR. GUIRGUIS: Is that the  
19 front -- sorry, 162.

20 MS. MENNINGER: They're not  
21 in Bates order. They're put in  
22 the order of the passport.

23 THE WITNESS: Oh, yeah.

24 Mm-hmm.

25 MS. MENNINGER: It's page

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1 HIGHLY CONFIDENTIAL AEO

2 16.

3 Q. Do you see on that page a  
4 stamp from the Department of Homeland  
5 Security of the U.S., dated  
6 October 19, 2006?

7 A. Mm-hmm.

8 Q. Does that indicate to you  
9 that you were admitted to visit the  
10 U.S. on October 19th of 2006?

11 A. Yes, it does.

12 Q. Do you believe October 19th  
13 is during the summer in the U.S.?

14 A. No. I don't see the  
15 relevance.

16 Q. What season do you think  
17 October 19th is in the U.S.?

18 A. Okay. Well, considering I  
19 arrived in September, October's in  
20 winter. But I arrived in September.

21 Q. Okay. Well, do you believe  
22 that you did not enter the U.S. on  
23 October 19th, 2006?

24 A. Well, it's stamped.

25 Q. Does it say "admitted"?

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1 HIGHLY CONFIDENTIAL AEO

2 A. "Admitted," yes.

3 Q. Does it say "October 19,  
4 2006"?

5 A. Yes.

6 Q. Does it say "Department of  
7 Homeland Security, U.S. Customs and  
8 Border Patrol"?

9 A. Yes.

10 Q. So you do or do not believe  
11 you were admitted to the United States  
12 on October 19, 2006?

13 A. I flew in and had my  
14 passport stamped after I went on my  
15 trip to London in the UK.

16 Every time you go into a --  
17 as you all know, using your passport,  
18 every time you go into a new country,  
19 if you don't have their passport, you  
20 get a stamp. So if you go in several  
21 times, every time you go into that new  
22 country, it gets stamped.

23 Q. So you think you went on a  
24 trip in October and came back to the  
25 U.S. on October 19th?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I obviously went -- I  
3 arrived in New York a day on the 19th  
4 of October.

5 Q. Where were you coming from  
6 on October 19th?

7 A. I can't remember.

8 Q. You have no idea?

9 A. I think it was London. I  
10 made a trip to London.

11 Q. And how long were you in  
12 London in October?

13 A. I can't remember.

14 Q. A week?

15 A. I can't remember.

16 Q. Who paid for that ticket?

17 A. Myself.

18 Q. Did you go with anyone?

19 A. No.

20 Q. Did you have a new 90 days  
21 that began on October 19th?

22 A. Yes. It automatically  
23 starts every time you enter.

24 Q. So in order to be compliant  
25 with that visa, you needed to leave

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1                   HIGHLY CONFIDENTIAL AEO

2       within 90 days of October 19th?

3           A.       That's correct.

4           Q.       Do you know which airline  
5       you flew to London in 2006?

6           A.       I can't remember.

7           Q.       Do you know which class of  
8       service you flew?

9           A.       I can't remember.

10          Q.       Where is your current  
11       passport right now?

12          A.       It is in my hotel room.  
13       Here, in -- it's in my hotel room.

14          Q.       Got it.

15                   Did Natalya fly with you to  
16       London?

17          A.       No.

18          Q.       Did Jeffrey pay for you to  
19       go to London?

20          A.       I can't remember.

21          Q.       Do you know whether you had  
22       met Jeffrey before you went to London  
23       in October of 2006?

24          A.       I had met Jeffrey by then.

25          Q.       Do you have any emails or

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1                   HIGHLY CONFIDENTIAL AEO  
2           anything reflecting your travel plans  
3           on that trip?

4           A.        Oh, I think there was a  
5           plane, I think there was a plane  
6           booking or something.

7           Q.        For that trip to London in  
8           October of 2006?

9           A.        I think so. I would have to  
10          double check.

11          Q.        Where would you check?

12          A.        Well, I'm trying to go and  
13          find it in my email, my old email  
14          account, where all of my other emails  
15          exchanged between Sarah Kellen and  
16          Lesley Groff are.

17          Q.        Do you have any frequent  
18          flyer accounts?

19          A.        No.

20          Q.        Did your first trip to the  
21          private island in the U.S. Virgin  
22          Islands before or after you went to  
23          London and returned?

24          A.        What was the date in October  
25          again? 19th. I can't remember. I



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1                   HIGHLY CONFIDENTIAL AEO  
2       mean, I said earlier I can't remember  
3       the first time.

4           Q.       In the next sentence you  
5       say, "After that first trip, I  
6       traveled to the island several more  
7       times, usually on one of Jeffrey's  
8       private airplanes, and always at his  
9       direction."

10                   What do you mean by "always  
11       at his direction"?

12           A.       Well, I wasn't going to go  
13       there on my own, so I would have to be  
14       invited first. I didn't want to just  
15       go chill on my own. It was Jeffrey's  
16       house, so he had to phone me and  
17       invite me before I decided I wanted to  
18       go to his island.

19           Q.       So he phoned you, he invited  
20       you, and you decided you wanted to go  
21       to his island.

22           A.       No, I had to go to his  
23       island.

24           Q.       Why did you have to go to  
25       his island?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.        Because I was frightened of  
3 him.

4           Q.        Did Jeffrey ever hit you?

5           A.        No, he didn't.

6           Q.        Did you ever see Jeffrey  
7 with a weapon?

8           A.        No.

9           Q.        Have you reviewed any flight  
10 logs?

11          A.        No, not that I recall.

12          Q.        You've never seen a flight  
13 log?

14          A.        I've seen one which showed  
15 my name.

16          Q.        When did you first become  
17 frightened of Jeffrey Epstein?

18          A.        During my time with him in  
19 New York.

20          Q.        What period of time?

21          A.        Pretty much soon after I met  
22 him, actually, and he forced the  
23 vibrator on my vagina for an extended  
24 period of time, which considerably  
25 hurt my lady region, actually.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. That's when you became  
3 frightened of him?

4 A. Yes, absolutely.

5 Q. You've seen a flight log  
6 with your name on one flight?

7 A. Yes, I have.

8 Q. When did you see that?

9 A. I saw it in January, and it  
10 was to confirm that --

11 MR. GUIRGUIS: I'm going to  
12 object. Hold on.

13 Is this -- if this is a  
14 communication with counsel, you  
15 should understand, any time she  
16 asks you a question, if the  
17 answer is it was with counsel,  
18 then you don't answer.

19 Was this with counsel?

20 THE WITNESS: Yes.

21 MR. GUIRGUIS: Don't answer.

22 MS. MENNINGER: Seeing a  
23 document when you're with counsel  
24 is privileged?

25 MR. GUIRGUIS: I don't know

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1 HIGHLY CONFIDENTIAL AEO

2 what your next question is going  
3 to be, so...

4 MS. MENNINGER: I asked her  
5 when she saw the flight logs.  
6 And she said in January, correct?

7 MR. GUIRGUIS: Right. And  
8 then she was about to continue  
9 the answer. I'm fine with the I  
10 saw it in January. That's why I  
11 didn't object when you asked the  
12 question.

13 I'm objecting to her  
14 continuing and caution the  
15 witness not to waive her  
16 attorney/client privilege.

17 Q. Don't tell me anything that  
18 your lawyer said to you.

19 You reviewed the flight log  
20 in January?

21 A. I reviewed one flight log,  
22 which confirmed that I was there.

23 Q. What other documents did you  
24 review?

25 A. No other documents.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. In addition to Jeffrey and  
3 Nadia, what other girls did you have  
4 sexual relations with on the island?

5 A. I can't remember their  
6 names.

7 Q. Can you remember any of  
8 their names?

9 A. There were a few.

10 Q. Can you remember any of  
11 their names?

12 A. [REDACTED], Jen -- sorry, I  
13 misunderstood your question. I didn't  
14 have sexual relations with [REDACTED].  
15 Sorry, I misunderstood you.

16 It was Jen, Natalya and  
17 Nadia. And there were a couple  
18 others, I don't remember their names.

19 Q. What are other guests did  
20 you have sexual relations with on the  
21 island?

22 A. It was only those ones.

23 Q. Do you know the ages of any  
24 of the individuals you had sexual  
25 relations with on the island?

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1 HIGHLY CONFIDENTIAL AEO

2 A. They were 18, I assumed.  
3 Natalya was around my age, was my age.

4 Q. In the next paragraph, you  
5 refer to meeting Ghislaine Maxwell on  
6 one of your visits to the island,  
7 correct?

8 A. Correct.

9 Q. You said, "Watching her  
10 interact with the other girls on the  
11 island, it became clear to me that she  
12 recruited all or many of them to the  
13 island."

14 What do you mean that?

15 A. That she recruited a lot of  
16 the girls.

17 Q. What did you see?

18 A. I saw how she interacted  
19 with all the girls. You know, if you  
20 walk into any -- I mean, common  
21 sensewise, if you walk into a firm,  
22 you kind of know who the boss is.

23 You know, all the girls kind  
24 of reported to Ghislaine. Ghislaine  
25 was like the mama bear, if you know

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1                   HIGHLY CONFIDENTIAL AEO  
2           what I mean. She called the shots; we  
3           had to listen to Ghislaine.

4                   And Ghislaine was Jeffrey's  
5           right-hand woman, so, you know,  
6           whatever Jeffrey wanted went through  
7           Ghislaine and then filtered through.

8           Q.       What did any girl report to  
9           Ghislaine in your presence?

10                   MR. GUIRGUIS: Objection.

11                   I'm not sure that's -- just  
12                   objection to form.

13           Q.       You said that the girls  
14           reported to Ghislaine. What did you  
15           see or hear that caused you to say  
16           that?

17           A.       Well, it's pretty obvious.  
18           I mean, Ghislaine called the shots.

19                   So, for example, when -- I  
20           can't remember specifics, but Natalya,  
21           I think, had an issue. And she had to  
22           speak to Ghislaine if there was ever  
23           an issue.

24           Q.       What issue?

25           A.       I can't remember

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1                   HIGHLY CONFIDENTIAL AEO  
2           specifically. We always have issues.  
3           Girls have issues. We have period  
4           pains, we've got headaches.

5                   You know, we had to look a  
6           certain way for Jeffrey. So if we put  
7           on a little bit of weight or, for  
8           example, if my hairstyle was wrong --  
9           Jeffrey liked girls to look a certain  
10          way.

11                   So, for example, there was  
12          one occasion where Jeffrey didn't like  
13          my hair and Ghislaine told me to  
14          change it.

15                   So there was -- everyone was  
16          afraid of Ghislaine. All the girls  
17          were afraid of her, so everyone --  
18          Sarah Kellen reported to her. Lesley  
19          Groff reported to her. I don't know  
20          how to tell you.

21                   So when I say reporting, I  
22          witnessed with my own two eyes Sarah  
23          Kellen reporting to Ghislaine in front  
24          of me, but I can't remember specifics.  
25          They were talking about girls. I



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1                   HIGHLY CONFIDENTIAL AEO  
2           can't remember the specific  
3           conversation. But every single person  
4           100 percent, 200 percent reported to  
5           Ghislaine. 100 percent.

6           Q.        Okay. Great. I appreciate  
7           your certainty.

8           A.        Absolutely.

9           Q.        So we have Sarah Kellen  
10          having a discussion with Ghislaine  
11          about girls. What other discussions  
12          did you overhear?

13          A.        There were various  
14          discussions. We were always talking  
15          about girls. There was a constant  
16          influx of girls. There were so many  
17          girls. There were girls in Miami.  
18          There were guests coming. There  
19          were --

20                    It's like, I'm sure if you  
21          go into a hooker's brothel and see how  
22          they run their business, I mean, it's  
23          just general conversation about who's  
24          going to have sex with who and, you  
25          know -- what do you talk about when

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2 all do you is have sex every day on  
3 rotation? I mean, what is there to  
4 talk about?

5 Q. You were in Miami? When did  
6 you go to Miami?

7 MR. GUIRGUIS: Objection.

8 MS. MCCAWLEY: Objection.

9 A. No, I didn't go to Miami. I  
10 didn't say that.

11 Q. Apart from general  
12 conversation, do you recall any  
13 specifics of any female reporting to  
14 Ghislaine?

15 A. Yes, I saw. And with my own  
16 eyes, I saw how Ghislaine and Lesley  
17 Groff and the other girls reported to  
18 them.

19 If you would like me to  
20 report specific conversations, I  
21 can't. But in my being an adult and  
22 having common sense and a sensible  
23 head on my shoulders, you can quite  
24 quickly work out who is the management  
25 there.

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2 And we were told by Jeffrey  
3 Epstein to listen to Ghislaine. So  
4 Ghislaine was the main right-hand  
5 woman of Jeffrey Epstein. We were  
6 told by Jeffrey Epstein to listen to  
7 Ghislaine.

8 Q. When did Jeffrey Epstein  
9 tell you that?

10 A. I can't remember the exact  
11 time, date or where I was standing, on  
12 which pavement or crack. But it was  
13 around the time that I met Ghislaine.

14 Q. Which was on the island?

15 A. I can't remember what date,  
16 time, pavement, where I was standing.  
17 But I was told during around the time  
18 I met Ghislaine that I had to listen  
19 to Ghislaine.

20 Q. By Jeffrey?

21 A. By Jeffrey. And every  
22 single other girl that I've ever met  
23 with Jeffrey.

24 Q. And we know three names, but  
25 that's it?

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2           A.       Those are three names that I  
3 remember, but I met -- I met lots of  
4 girls. Lots.

5           Q.       Okay.

6           A.       Yeah.

7           Q.       What activities was  
8 Ghislaine Maxwell in charge of?

9           A.       In terms of -- can you  
10 explain activities, please?

11          Q.       I'm actually just looking at  
12 your affidavit on paragraph 3, so why  
13 don't you take a look at that.

14          A.       Activities. Activities. So  
15 when we had to go to the island, when  
16 we had to go see Jeffrey in New York,  
17 when we had to go to his mansion.

18                   You know, we saw Jeffrey  
19 pretty regularly. I was on rotation  
20 pretty much every day, so -- amongst  
21 other girls.

22                   So Ghislaine also called  
23 me -- she also called the other  
24 girls -- when Jeffrey wanted his  
25 massage. So there was an occasion

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2           that I didn't want to go, and she got  
3           angry with me because I didn't want to  
4           give Jeffrey a massage.

5           Q.        When was that?

6           A.        It was on one of my -- one  
7           of my stays on the island. I can't  
8           remember what specific date or what  
9           specific time.

10          Q.        How many times were you on  
11          the island with Ghislaine?

12          A.        I can't remember  
13          specifically.

14          Q.        More than once?

15          A.        Yeah.

16          Q.        More than twice?

17          A.        I can't remember. I also  
18          saw her in New York quite a lot, so --  
19          I mean, this isn't just based on the  
20          island. I spent just as much time  
21          with Jeffrey and Ghislaine in New  
22          York, so we can't just concentrate on  
23          the island, please.

24          Q.        Did you believe Ghislaine  
25          was living in New York in January of

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2 2007?

3 A. I don't know where the hell  
4 Ghislaine lived, to be honest.

5 Q. But you saw her regularly in  
6 January of 2007?

7 MR. GUIRGUIS: Objection.

8 MS. MCCAWLEY: Objection.

9 A. Regularly, what's regularly?  
10 I saw her a few times. I don't know  
11 where she was living. I tried to  
12 actually not spend -- well, I tried to  
13 spend as little time with her as  
14 possible because every time I saw her  
15 on the island, she would call me to  
16 give Jeffrey a massage, so...

17 Q. You saw her more than once  
18 on the island and you saw her a few  
19 times in New York. Did you see her  
20 anywhere else?

21 MR. GUIRGUIS: Objection.

22 MS. MCCAWLEY: Objection,  
23 mischaracterizes testimony.

24 A. No.

25 Q. In New York, you saw her at

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2 Jeffrey's office. Did you see her  
3 anywhere else in New York?

4 A. I can't remember. I saw  
5 them, I spent a lot of time with them,  
6 so...

7 Q. How much time did you spend  
8 with Ghislaine?

9 A. Enough.

10 MR. GUIRGUIS: Objection.

11 That's vague.

12 A. Enough time. I mean, how  
13 long is a piece of string? I was here  
14 for a certain amount of time, and in  
15 that time, the majority of the time I  
16 spent with Jeffrey Epstein being  
17 involved with his pedophiling -- I  
18 mean, how much time have you spent  
19 with him? I don't know. It wasn't a  
20 lot of time, because I couldn't stand  
21 the woman and she was a bully and no  
22 one liked her, so no one really went  
23 out of their way to spend time with  
24 her.

25 So I didn't spend a lot of

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2           time with her because she's a  
3           particularly unpleasant person. And  
4           when I did spend time with her, it was  
5           either directing me to massage Jeffrey  
6           or her showing me how to massage  
7           Jeffrey, or I spent a lot of time with  
8           her on the island.

9                    Yeah, so how much time did I  
10           spend with Ghislaine in total of  
11           hours? I can't recall because it was  
12           ten years ago. I mean, how many hours  
13           did I spend with Jeffrey? I mean,  
14           what a silly question.

15           Q.       How many days did you see  
16           Ghislaine?

17           A.       Don't know.

18           Q.       Less than ten or more than  
19           ten?

20           A.       I can't remember.

21           Q.       Less than five or more than  
22           five?

23           A.       Can't remember.

24           Q.       You indicate that many girls  
25           you saw appeared to be young



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2 teenagers. Where did you see young  
3 teenagers?

4 A. It says they appeared to be  
5 teenagers. All the girls I saw looked  
6 young.

7 Q. Okay. Where did you see  
8 girls who appeared to be young  
9 teenagers?

10 A. On the island and in New  
11 York.

12 Q. Describe for me a young  
13 teenager that you saw.

14 MR. GUIRGUIS: Objection,  
15 mischaracterizes testimony.

16 A. So I never said I saw a  
17 teenager. They appeared to look like  
18 teenagers, okay? [REDACTED] was -- I try  
19 to look at [REDACTED]. I don't know how  
20 old [REDACTED] is, but she looked young.  
21 And I'm sure you can agree, as a mom,  
22 in the photos, that she looks pretty  
23 young for an old man to be bonking.  
24 So she looks really young. She looks  
25 younger than me.

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2 Q. Did you see her bonk  
3 someone?

4 A. No, but she told me. She  
5 told me and Nadia that they abused her  
6 on the island.

7 Q. Nadia said they abused who  
8 on the island?

9 MR. GUIRGUIS: Objection,  
10 mischaracterizes testimony.  
11 That's not what she said.

12 A. [REDACTED] said that Jeffrey  
13 and Nadia had abused her.

14 Q. Okay. And do you have any  
15 way to reach [REDACTED]?

16 A. I haven't spoken to her. I  
17 don't -- I just know her first name.

18 Q. You said you recall seeing  
19 "a particularly young, thin girl who  
20 looked well under 18," and you recall  
21 asking her her age.

22 When did you see this  
23 particularly young, thin girl who  
24 looked well under 18 and you recall  
25 asking her age?

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2 A. It was on the trips. I  
3 think you've got the photos. [REDACTED]  
4 is in the photos. So it was that trip  
5 in December.

6 Q. Did you take a photo of the  
7 young, thin girl who looked well under  
8 18?

9 A. I think I did take a photo  
10 of her. I don't have any more photos  
11 of her of my own.

12 Well, I have photos of her.  
13 You've got the photos.

14 Q. So the person --

15 A. I've given you all the  
16 photos that I have.

17 Q. The person that you wrote  
18 here was "a particularly young, thin  
19 girl who looked well under 18" is  
20 reflected in photographs you've  
21 produced in this case?

22 A. That's correct.

23 Q. And do you know her name?

24 A. Sorry, can you just repeat  
25 that? Didn't I just answer this

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2 question?

3 Yeah, that's [REDACTED] who I  
4 was particularly concerned about,  
5 about her age, in the photos that I  
6 have supplied with -- you with, with  
7 me in them with [REDACTED].

8 Q. So in your affidavit in  
9 paragraph 3 where you talk about "a  
10 particularly young, thin girl who  
11 looked well under 18," you are  
12 referring to [REDACTED]?

13 A. Yes.

14 Q. And you said you later  
15 learned she was a [REDACTED]

16 A. That's correct.

17 Q. How did you learn she was a  
18 [REDACTED]

19 A. Because she told me. And  
20 she told me Jeffrey Epstein was  
21 funding her [REDACTED] [REDACTED]

22 Q. And where was her [REDACTED]

23 [REDACTED]

24 A. I don't know.

25 Q. When did she tell you this?

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2 A. During that December trip.

3 Q. Was that the only trip you  
4 took with her?

5 A. I can't -- I can't remember.  
6 I think there was another trip, but I  
7 can't remember.

8 Q. Did you ever see her name on  
9 a flight log?

10 A. No.

11 Q. Was she on the plane with  
12 you?

13 A. I can't -- I can't remember.  
14 I can't remember. Yeah, I just  
15 remember [REDACTED] on the island.

16 Q. Other than her telling you  
17 she was a [REDACTED] did she tell you  
18 anything else about herself?

19 A. Yeah, you know, I think she  
20 came from quite a tough background.

21 Q. What did she say?

22 A. Well, I can't remember the  
23 specifics, but I remember that -- I  
24 don't know if she had issues with her  
25 parents -- I don't know. She was a

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2 bit of a -- you know, she was a -- I  
3 was worried about her.

4 Q. What did she say to cause  
5 you to be worried about her?

6 A. Well, I first met her -- she  
7 was new to Jeffrey Epstein's list of  
8 girls in December. And when I first  
9 met her, she was a really bubbly girl  
10 and -- I mean, she was young. She was  
11 inexperienced. She -- she was frail.  
12 And she changed quite quickly after  
13 that first trip.

14 Q. How many trips did you take  
15 with her?

16 A. I think it was more than  
17 one. I can't remember. I saw her a  
18 lot.

19 Q. Where did you see her?

20 A. Oh, it was either New York  
21 or the island. I mean, I can't  
22 remember.

23 Q. In New York, where did you  
24 see her?

25 A. I think we met -- like we

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2 all met a couple times in New York.

3 We all kind of knew each other.

4 Q. Did you ever see her [REDACTED]

5 A. No.

6 Q. Did she live in an apartment  
7 that you went to?

8 A. I can't remember about her  
9 living arrangements.

10 Q. Do you know where her [REDACTED]  
11 [REDACTED] was?

12 A. No.

13 Q. When did you ask to see her  
14 passport?

15 A. When we shortly arrived to  
16 the Virgin Islands, she looked  
17 particularly young. And you know what  
18 girls are like with passport -- with  
19 passport pictures. They don't -- they  
20 get embarrassed about their passport  
21 pictures.

22 And she was quite cagey  
23 about her passport, so she didn't show  
24 me. I don't know whether that -- I  
25 don't know. She just didn't show me.

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2 Q. Did she say why she wasn't  
3 showing it to you?

4 A. She said it was because she  
5 was embarrassed about the picture.

6 Q. Were you living in the same  
7 room with her on the island?

8 A. Yeah, we stayed in the same  
9 room.

10 Q. Did you ever attempt to look  
11 at her passport when she wasn't there?

12 A. No.

13 Q. Did you ever call any  
14 authorities about having seen this  
15 young, thin girl who looked well under  
16 18?

17 A. No.

18 Q. In the fourth paragraph, you  
19 described being lent out to Jeffrey's  
20 friends in New York.

21 Which friends of Jeffrey's  
22 were you lent out to to have sex?

23 A. Alan Dershowitz.

24 Q. Who else?

25 A. Nadia. All the girls that



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2           were involved, really. I had to have  
3           sex with them, so...

4           Q.       Well, what do you mean by  
5           lent out?

6           A.       Lent out as in -- so I was  
7           one of the girls that regularly --  
8           that Jeffrey regularly asked to see  
9           sexually.

10                   And what my description was  
11           of being lent out is when -- it's  
12           almost like Jeffrey's quite possessive  
13           of his girls. He's -- you know, he  
14           lends them out.

15                   He samples the girls, he has  
16           friends come over to New York or the  
17           island and they -- they get to see who  
18           all the girls are around Jeffrey, and  
19           they get to pick one which they want  
20           to be with.

21           Q.       So you were with Jeffrey and  
22           a number of other females in New York  
23           when a person, a friend would come in,  
24           Alan Dershowitz would come in and look  
25           at all of the girls and choose one?

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2 MS. MCCAWLEY: Objection.

3 MR. GUIRGUIS: Objection,  
4 mischaracterizes testimony.

5 MS. MENNINGER: I'm asking a  
6 question.

7 MR. GUIRGUIS: I'm objecting  
8 to your question.

9 A. So let me give you a  
10 specific example of that. So, for  
11 example, there was an occasion where I  
12 and some of the other girls were on  
13 the island. So a specific occasion  
14 was when Sergey -- I don't know his  
15 surname, but he owns Google or  
16 whatever, and he came with his  
17 fiancée.

18 So, you know, you got a  
19 table with Jeffrey Epstein of lots of  
20 women -- girls, women, whatever --  
21 beautiful girls, and you've got  
22 friends joining him. And friends  
23 popped over all the time.

24 So I had other -- there were  
25 other males that visited Jeffrey on

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2       the island. I don't know who they  
3       are. I can't remember their names.

4                   But, yeah. I mean, he  
5       didn't -- he didn't line them up and  
6       go, hey, boys, pick which vagina you  
7       want. He didn't do it that blatantly.

8                   But they had spent time with  
9       the girls during a lunch on the  
10      island -- yeah, I mean, they -- his  
11      friends would spend time with us.

12                  Q.       Okay. In paragraph 4, where  
13      you say, "At his townhouse, I was also  
14      lent out by him to his friends and  
15      associates to have sex."

16                         What do you mean by that  
17      sentence?

18                  A.       Well, I mean, it's quite  
19      obvious with the incidents -- well,  
20      the incident that happened with Alan.  
21      So I would classify that as being lent  
22      out. I didn't willingly go, hey,  
23      Alan, let's have some fun, because no  
24      one on the planet would say that to  
25      Alan.

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2 Q. So you say "lent out by him  
3 to his friends and associates."

4 Who are the friends and  
5 associates that you were lent out to?

6 MR. GUIRGUIS: Objection,  
7 asked and answered.

8 A. Alan Dershowitz and Nadia.  
9 The girls that I mentioned. There  
10 were other girls that I had sexual  
11 intercourse with, but I can't remember  
12 their names.

13 Q. Were there any other men?

14 A. No, there weren't any other  
15 men.

16 Q. Prince Andrew?

17 A. No.

18 Q. [REDACTED] [REDACTED] [REDACTED] ?

19 A. No, no, I don't know that.

20 Q. Bill Richardson? Yes? No?

21 A. No. That I would be lent  
22 out to have sex with?

23 Q. Yes.

24 A. No, no.

25 Q. Tom Pritzker?

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2 A. No.

3 Q. Marvin Minsky?

4 A. No.

5 Q. Were you paid money after  
6 you had sex with Alan Dershowitz?

7 A. No.

8 Q. Were you paid money after  
9 you had sex with Nadia?

10 A. No.

11 Q. Were you paid money after  
12 you had sex with Natalya?

13 A. No.

14 Q. Were you paid money after  
15 you had sex with any of the other  
16 girls --

17 A. No.

18 Q. -- of names you can't  
19 remember?

20 A. I was only ever paid to --  
21 when I had sex with Jeffrey himself.

22 Q. In the course of massage?

23 A. Yes.

24 Q. Did you ever have sex with  
25 Jeffrey not in a massage context?

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2 A. Yeah, we -- yeah. He was  
3 really intimate all the time. We  
4 had -- multiple times. I can't tell  
5 you how many times I've slept with  
6 Jeffrey. I mean, we were on rotation.  
7 Every single day, it was -- sometimes  
8 twice a day I was called.

9 You know, Ghislaine, Sarah  
10 Kellen -- you know, it was -- yeah. I  
11 mean, how -- we were on rotation  
12 pretty much the whole time I was here.

13 Q. And when you say you were on  
14 rotation, you mean you were having sex  
15 with Jeffrey multiple times per day?

16 A. No. As in when I was  
17 finished, another girl was called by  
18 Ghislaine. And when they had  
19 finished, another girl was called.

20 Q. How do you know that another  
21 girl was called by Ghislaine?

22 A. Because I was there, and I  
23 saw it and heard it with all my  
24 senses. I saw Ghislaine call another  
25 girl, and she called me herself, to go

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2 give Jeffrey Epstein a sexual massage.

3 Q. What do you mean by call? I  
4 guess I'm thinking like telephone.

5 That may be my --

6 A. No. As in going up to the  
7 person and going, Jeffrey wants to see  
8 you in his bedroom, which meant it's  
9 your turn to be abused. That kind of  
10 thing.

11 Q. And this is on the island?

12 A. This is on the island.

13 Q. You heard -- as soon as you  
14 were done with Jeffrey, you heard  
15 Ghislaine go up to another girl and  
16 say, it's your turn with Jeffrey?

17 A. So every single day, I  
18 mean -- so I don't know how quickly  
19 Jeffrey's sperm bank fills up. I  
20 mean, I know guys can normally cum  
21 once or twice a day, but Jeffrey's not  
22 a normal person.

23 So, I mean, our rotation  
24 changed every day that specific trip  
25 we had in December.

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2 So, for example, I would be  
3 called. Maybe a couple hours when  
4 Jeffrey had a little, you know, break,  
5 another girl was called, [REDACTED].

6 Then another girl was called. Every  
7 single day.

8 We tried to hide on  
9 different -- like, so we wouldn't have  
10 to get called. We'd generally have to  
11 sit in the main area. There was like  
12 a big pool, the main seating area.  
13 There was a big table. We'd sit there  
14 and do kind of art on the table, and  
15 we always had to be around. We  
16 weren't allowed to go very far on the  
17 island.

18 We always had to report to  
19 Ghislaine and Jeffrey and tell them if  
20 we were going down to the beach to  
21 swim because they had an inflatable  
22 trampoline. So they -- I mean, we  
23 always had to tell Ghislaine and  
24 Jeffrey where we were at all times.

25 Q. On the island?



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2 A. On the island, yeah.

3 Q. In New York -- strike that.

4 How many times a day, to  
5 your knowledge, did Jeffrey Epstein  
6 have sex?

7 A. To my knowledge, from what I  
8 saw and what I've witnessed -- I don't  
9 know what he did when I wasn't  
10 there -- up to about three, four times  
11 a day.

12 Q. So you had sex with him  
13 three or four times a day?

14 MS. MCCAWLEY: Objection.

15 A. No.

16 Q. I'm sorry. You said to your  
17 knowledge, what you witnessed. I'm  
18 trying to understand what you mean.

19 A. So as soon as I slept with  
20 Jeffrey, a certain time would go by.  
21 He maybe had a coffee. And then there  
22 was a specific occasion where then  
23 [REDACTED] was called to go and do that  
24 for Jeffrey.

25 Q. And you were not in the room

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2 when [REDACTED] was with Jeffrey?

3 A. No, but I was certainly  
4 there afterwards, because she was  
5 forced to have sex with Nadia and  
6 Jeffrey Epstein.

7 Q. That happened?

8 A. Yes. And she had never had  
9 a female experience before and she was  
10 very upset, very upset.

11 Q. So you didn't personally see  
12 it, but you talked to [REDACTED] and saw  
13 her afterwards?

14 A. Well, I don't think the  
15 girls, when they were called, were  
16 making cups of tea with Jeffrey in his  
17 room. So -- and when a girl comes out  
18 crying and I know that I've been  
19 sexually abused, it's quite safe to  
20 assume.

21 And when that girl tells you  
22 she's being forced to have sex with  
23 Jeffrey Epstein and Nadia, you know,  
24 it's there, isn't it.

25 Q. So she told you?

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2 A. Yes, she told me. And with  
3 my own intelligence, in my -- you  
4 know, I can see with my own senses. I  
5 can hear things, see things. It's  
6 quite obvious what was going on.

7 MS. MENNINGER: I need a  
8 small break.

9 (Time noted: 4:17 p.m.)

10 (Recess.)

11 (Time noted: 4:28 p.m.)

12 Q. On Defendant's Exhibit 3 in  
13 the last paragraph, you describe  
14 having had sex with Alan Dershowitz,  
15 correct?

16 A. Correct.

17 Q. You say in the last sentence  
18 that you recall "specific key details  
19 of his person."

20 What specific key details of  
21 his person do you recall?

22 A. You know, I recall his  
23 appearance. You know, I'd met him,  
24 you know, twice beforehand. So in  
25 terms of specific key details, I can

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2 describe how he looked.

3 Q. How did he look?

4 A. He was, as I've explained --  
5 described earlier, quite -- quite an  
6 elderly man, wore glasses, quite  
7 pasty, pasty-skinned. Not well, I  
8 assumed, not at all well. He wasn't  
9 well, W-E-L-L. Like, he wasn't a --  
10 he wasn't -- he wasn't a healthy  
11 person.

12 Q. And do you recall whether he  
13 had a mustache?

14 A. I can't -- I can't recall if  
15 he had a mustache, no.

16 Q. Which of those that you just  
17 described are the key details you are  
18 referring to in paragraph 4?

19 MS. MCCAWLEY: Objection,  
20 asked and answered.

21 A. As I've described. I  
22 mean...

23 Q. Pasty skin?

24 A. Pasty skin, wrinkly. I  
25 didn't -- I tried to pay as little

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1                   HIGHLY CONFIDENTIAL AEO  
2           attention to him as possible. During  
3           that session, I was completely  
4           overwhelmed. I -- it completely took  
5           me by surprise, that incident, and I  
6           was exceptionally upset by what was  
7           going on because I felt that I had  
8           been coerced beforehand, that it had  
9           been prior arranged to me arriving  
10          there.

11           Q.        Can you describe any other  
12           specific key detail of his person that  
13           you haven't already mentioned?

14           A.        I can't remember specific  
15           ones. It was -- I just tried to just  
16           get it done as soon as possible to get  
17           out of there. I couldn't wait to get  
18           out of there quick enough, to be  
19           honest.

20           Q.        Did you tell your attorneys,  
21           I recall specific key details of this  
22           person?

23           A.        I think I've just described  
24           that key details of this person.

25           Q.        Did you say those words to

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1 HIGHLY CONFIDENTIAL AEO

2 your attorneys when you drafted this?

3 MR. GUIRGUIS: Objection,  
4 asked and answered.

5 MS. MCCAWLEY: Objection.

6 A. I do recall specific  
7 details, which I've given.

8 Q. And they're the ones you've  
9 already given?

10 A. I don't -- as I specified,  
11 this was a coerced event that took  
12 place. I was extremely upset. I did  
13 not want to have sexual intercourse  
14 with Alan.

15 I did not -- I don't -- I  
16 don't remember specific -- I don't  
17 remember specific things. I remember  
18 Nadia -- me paying particular  
19 attention to Nadia because I didn't  
20 want Alan touching me, so it was -- as  
21 I said, it was a traumatic experience.

22 I don't remember the finer  
23 details of Alan Dershowitz's private  
24 parts or any other thing. I tried to  
25 spend as little time as possible

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1                   HIGHLY CONFIDENTIAL AEO  
2           touching Alan, as I'm sure you can  
3           imagine.

4           Q.           How was it coerced?

5           A.           It was coerced in the sense  
6           that when I arrived there, Alan  
7           Dershowitz was there and Nadia was  
8           there. It was quite clear to me what  
9           their intention was after me arriving  
10          there.

11          Q.           There being where?

12          A.           Jeffrey's New York  
13          apartment.

14          Q.           When you arrived at  
15          Jeffrey's New York apartment, Alan was  
16          already there?

17          A.           Yes.

18          Q.           And Nadia was already there?

19          A.           Yes.

20          Q.           What were the specific key  
21          details of the sex acts that you can  
22          remember that you have not already  
23          described?

24          A.           There was cunnilingus  
25          involved, masturbation.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Who performed cunnilingus on  
3 who?

4 A. We all performed cunnilingus  
5 on each other.

6 Q. So did anyone perform  
7 cunnilingus on Mr. Dershowitz?

8 A. Is that the same as girls  
9 and boys? Yeah, same definition.

10 Q. Did you perform cunnilingus  
11 on Nadia?

12 A. Yes.

13 Q. Did she perform it on you?

14 A. Yes.

15 Q. Did Mr. Dershowitz perform  
16 it on you?

17 A. Yes.

18 Q. Did he perform it on Nadia?

19 A. Yes.

20 Q. And any other specific key  
21 details of the sex acts you can  
22 describe?

23 A. There was a lot of touching,  
24 fondling, yeah.

25 Q. When you say Professor



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1                   HIGHLY CONFIDENTIAL AEO  
2       Dershowitz's name, you say Dershovitz  
3       with a V, phonetically, correct?

4           A.       I'm slightly dyslexic and  
5       I'm terrible with names. So it's  
6       known that I've always struggled with  
7       pronunciations, especially because of  
8       my accent as well.

9           Q.       Do you believe you were  
10       introduced to him as Dershovitz with a  
11       V?

12          A.       I was introduced to him as  
13       Alan.

14          Q.       Did you ever hear anyone say  
15       his last name?

16          A.       Yes.

17          Q.       Did you hear those people  
18       say it with a V?

19          A.       I can't recall the exact  
20       pronunciation of the tongue, but the  
21       way my ears hear words -- perhaps you  
22       can contact my university. I don't --  
23       I have difficulty with names and I'm  
24       slightly dyslexic, so...

25                   MS. MENNINGER:   Okay.   Can

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1 HIGHLY CONFIDENTIAL AEO

2 you mark this as Defendant's  
3 Exhibit 5.

4 (Defendant's Exhibit 5, jury  
5 trial demand, was marked for  
6 identification.)

7 MS. MCCAWLEY: Because I  
8 forget earlier, just for the  
9 record, the plaintiff in the case  
10 is going to mark the deposition  
11 as confidential.

12 MS. MENNINGER: Yes. I  
13 discussed it with the court  
14 reporter, and I think he already  
15 has, but if not, he will do it.

16 MS. MCCAWLEY: Okay.

17 Q. Can you take a look at  
18 Defendant's Exhibit 5.

19 A. Yes.

20 Q. Have you seen this document  
21 before?

22 A. Yes.

23 Q. Did you review it before it  
24 was filed?

25 A. Yes.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. What do you understand this  
3 document to be?

4 A. This is a complaint against  
5 Jeffrey Epstein.

6 Q. Anyone else?

7 A. Ghislaine Maxwell, Sarah  
8 Kellen, Lesley Groff, Natalya  
9 Malyshev.

10 Q. And this is a complaint that  
11 you authorized be filed on your  
12 behalf?

13 A. That's correct.

14 Q. And at the end of this  
15 complaint, you ask for money to be  
16 awarded to you, correct?

17 A. Can you refer me to the  
18 specific page, please?

19 Q. Well, do you understand that  
20 you are asking for money to be awarded  
21 to you?

22 A. Can you tell me which page  
23 that's on, please.

24 Q. I'm just asking your  
25 understanding.

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1 HIGHLY CONFIDENTIAL AEO

2 A. Nothing's been promised to  
3 me about money.

4 Q. Were you seeking money when  
5 you authorized this complaint to be  
6 filed on your behalf?

7 A. No. I just wanted a  
8 pedophile behind bars, really, and for  
9 him to stop abusing young girls.

10 Seeing as I'm going to be a  
11 parent myself, I can't really live  
12 with myself, knowing that there's a  
13 pedophile with my kids on the planet.  
14 So as a responsible human being, I  
15 thought that I would come forward.

16 Q. So your hope in filing this  
17 lawsuit was not to recover any money?

18 A. No. I want Jeffery and  
19 Ghislaine and all of these people  
20 behind bars so I can then visit them  
21 in jail.

22 Q. In paragraph 36 of this,  
23 which is on page 11, can I have you  
24 review that paragraph.

25 A. Yep.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you know what that  
3 paragraph refers to?

4           A.       Yes, I do.

5           Q.       What is the basis for your  
6 statement that "Defendant Malyshev  
7 reported to Defendants Kellen, Groff  
8 and Maxwell, and was paid for her  
9 recruitment of young females,  
10 including the recruitment of  
11 plaintiff"?

12          A.       She told me face to face, in  
13 person, that she was paid by Jeffrey.

14                   And Jeffrey also offered to  
15 pay me \$5,000 to find him a new  
16 18-year-old model PA to help him with  
17 his multi-billionaire corporation,  
18 because she's that qualified.

19          Q.       So when you say recruitment  
20 of young females, you're referring to  
21 people who are 18?

22          A.       Yes.

23          Q.       And at the time you were in  
24 touch with Ms. Malyshev, you were 22,  
25 correct?

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1 HIGHLY CONFIDENTIAL AEO

2 A. That's correct.

3 Q. Apart from what Ms. Malyshev  
4 told you, do you have any other basis  
5 for knowing that Malyshev reported to  
6 Kellen, Groff and Maxwell and was paid  
7 for her recruitment of young females,  
8 including you?

9 A. What she told me.

10 Q. Apart from what she told  
11 you, do you have any other basis for  
12 that?

13 A. Well, I saw it with my own  
14 eyes. I was a witness.

15 Q. What did you witness?

16 A. I witnessed the same thing  
17 all the other girls did, the same  
18 thing I had to do, was go and report  
19 to Sarah Kellen, Lesley Groff and  
20 Ghislaine.

21 Ghislaine was the main lady.  
22 Sarah Kellen and Lesley Groff did all  
23 the admin, like booking flights, like  
24 what a normal PA does.

25 Do you understand?

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Well, did you get paid for  
3 recruitment of young females?

4           A.       Jeffrey Epstein told me that  
5 he would give me money to find him a  
6 PA for him in South Africa.

7           Q.       You did not find a PA,  
8 correct?

9           A.       Absolutely not.

10          Q.       And you did not get paid for  
11 recruitment of young females, correct?

12          A.       Absolutely not.

13          Q.       You say in paragraph 37 that  
14 you were introduced to Epstein by  
15 Malyshev, correct?

16          A.       Correct.

17          Q.       And Epstein confirmed to you  
18 that he would use his wealth and  
19 influence to have you admitted into  
20 FIT, correct?

21          A.       That's correct.

22          Q.       What did Epstein say to you  
23 to confirm that? He said, I will use  
24 my wealth and influence to have you  
25 admitted, or some other words?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I can't remember the exact  
3 conversation, but from the very  
4 beginning Jeffrey and Ghislaine knew  
5 what my intentions were and why I  
6 wanted to stay in New York, which was  
7 to get a degree.

8 Q. Did Epstein say something to  
9 you about a similar institute of  
10 higher learning offering a curriculum  
11 of fashion industry training?

12 A. No. I was pretty adamant  
13 that I wanted to go to FIT. It's one  
14 of the best fashion schools, so...

15 Q. In paragraph 38, you say  
16 Maxwell told you that you would "need  
17 to provide Epstein with body massages  
18 in order to reap the benefits of his  
19 and her connections."

20 What did Ms. Maxwell say to  
21 you in regards to giving body massages  
22 in order to reap benefits of her  
23 connections?

24 A. Well, the fact that she told  
25 me I had to weigh 52 kilograms in



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1                   HIGHLY CONFIDENTIAL AEO  
2       order for them to pay for my  
3       education, that was pretty -- that was  
4       one of the conversations that she had  
5       with me.

6           Q.       Does that have something to  
7       do with body massages?

8           A.       Can you repeat -- let me  
9       read the question again.

10                   So I would just like to  
11       clarify, body massages meant sex,  
12       okay? That's like a key word for sex.  
13       So as soon as you stop having sex with  
14       Jeffrey and his friends and his girls,  
15       you're out, because otherwise there's  
16       no reason for you to be associated  
17       with Jeffrey, because you're just  
18       there to have sex with him, so...

19           Q.       Can I direct your attention  
20       to the first sentence in paragraph 38,  
21       and can you just explain to me when  
22       that conversation took place.

23                   MR. GUIRGUIS: Objection,  
24       form.

25           A.       First time I met Ghislaine,

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1                   HIGHLY CONFIDENTIAL AEO

2       from the very first beginning.

3           Q.       What did Ghislaine say to  
4       you?

5           A.       I can't remember the  
6       specific conversation. But the fact  
7       that she helped me refine my massage  
8       skills to satisfy Jeffrey, I think  
9       it's pretty self-explanatory.

10          Q.       The one you described  
11       earlier?

12          A.       The one I described earlier.

13          Q.       Okay. In the second  
14       sentence, where it says, "Maxwell and  
15       Epstein also threatened plaintiff that  
16       while they had the ability to advance  
17       her education and career, they also  
18       had the ability to make sure that she  
19       would obtain no formal education or  
20       modeling agency contracts if she  
21       failed to provide the sexual favors  
22       desired by defendant Epstein or abide  
23       by the instructions given her by  
24       defendants Epstein and Maxwell."

25          A.       Mm-hmm.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. What did Ms. Maxwell say to  
3 you that gave rise to this particular  
4 statement?

5 A. Well, the fact that she used  
6 to personally call me herself to give  
7 Jeffrey sexual massages. Not body  
8 massages; sexual massages. It should  
9 be rephrased.

10 I mean, it was pretty  
11 obvious. I mean, the whole weight  
12 thing. I tried to swim off the  
13 island. I tried to escape from an  
14 island during the evening to try and  
15 escape from her because if I didn't  
16 lose weight, they would cut me out of  
17 their -- financially off. I would  
18 lose the place that I was staying at.  
19 I would lose my education. You name  
20 it.

21 They bullied me with  
22 everything, just like they did with  
23 the other girls.

24 Q. In paragraph 38, you say,  
25 "Maxwell and Epstein also threatened

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1 HIGHLY CONFIDENTIAL AEO

2 plaintiff."

3 What was the threat that was  
4 made to you by Maxwell?

5 MS. MCCAWLEY: Objection,  
6 asked and answered.

7 A. The fact that I would lose  
8 everything that they promised me.  
9 They -- they were really naughty. You  
10 know, they took girls from very  
11 underprivileged families. They gave  
12 them accommodation, they gave them  
13 food, gave them money for  
14 transportation, you know, private  
15 planes, etcetera, etcetera.

16 So if I didn't have sex with  
17 Jeffrey, I would be homeless and  
18 starving in New York, so -- and my  
19 dream of getting a full-time education  
20 at one of the top fashion institutes  
21 in the world would be diminished.

22 And that's what he held over  
23 my head, exactly like he did with  
24 [REDACTED] and the other girls. He was  
25 paying for all of their educations.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       How do you know that?

3           A.       Because they were telling  
4 me. It was common knowledge amongst  
5 all the girls. No other girl would be  
6 there willingly just to have sex with  
7 Jeffrey.

8           Q.       In paragraph 40, you say,  
9 "Maxwell instructed plaintiff how to  
10 massage Epstein using the techniques  
11 that he preferred."

12          A.       Correct.

13          Q.       Is that the accident you  
14 described earlier on the island?

15          A.       There were many times that  
16 she gave me massage techniques to help  
17 refine my techniques. Jeffrey Epstein  
18 was all about massages and the  
19 techniques. He liked as many girls  
20 touching him as possible all the time.

21                   So there was more than one  
22 occasion that Ghislaine showed me how  
23 to massage him. It could have been on  
24 that specific trip or the other one.

25                   I'm not quite sure day,

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1                   HIGHLY CONFIDENTIAL AEO  
2           time, what seat I was sitting in, what  
3           color the seat it is, but she on more  
4           than one occasion showed me how to  
5           massage Jeffrey and how to get out the  
6           extreme knots in his body. Because  
7           everyone knows about his knots and how  
8           he likes them to pop and, yeah, the  
9           specific techniques that he likes.

10           Q.       The next sentence reads,  
11           "During plaintiff's first massage,  
12           defendant Epstein converted it into a  
13           sexual act..." and it goes on.

14                    Your first massage that  
15           defendant Epstein converted into a  
16           sexual act was prior to you meeting  
17           Ms. Maxwell, correct?

18           A.       Yes.

19                    MS. MENNINGER: I'm going to  
20           show you Defendant's Exhibit 6,  
21           which are some photographs.

22                    (Defendant's Exhibit 6,  
23           Bates stamped Ransome\_000017, was  
24           marked for identification.)

25           Q.       Do you recognize the

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1 HIGHLY CONFIDENTIAL AEO

2 photographs contained in Defendant's  
3 Exhibit 6?

4 A. Yes, I do.

5 Q. What are they?

6 A. They are photos of Jeffrey's  
7 island and the trip in December.

8 Q. Who took those photos?

9 A. Jean Luc took these specific  
10 photos.

11 Q. And when you were asked to  
12 provide these to us, where did you  
13 locate them?

14 A. I had a disk that Jean Luc  
15 had given me as a present and memento  
16 of that holiday.

17 Q. Where is that disk now?

18 A. In Spain.

19 Q. Do you see in the corner  
20 there are some little numbers with  
21 your last name and then some --

22 A. Oh, yeah, okay.

23 Q. I'm only showing you that so  
24 we can together go through to some.

25 A. Okay.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. So if I could ask you to  
3 turn to -- well, the first ones  
4 show --

5 A. Sergey, the guy who owns  
6 Google, is kitesurfing.

7 Q. Got it.

8 A. Yeah, that's Sergey.

9 Q. How do you know that that's  
10 Sergey?

11 A. Because he came for lunch  
12 that day and Sergey -- Sergey, hi, I'm  
13 Sergey.

14 Hi, Sergey.

15 Q. Did you have any sexual  
16 relations with Sergey?

17 A. No.

18 Q. If you could turn to the one  
19 that says RANSOME 22 in the corner.  
20 It's about five or six pages back.

21 A. Yes.

22 Q. Who is that in the  
23 photograph?

24 A. Jean Luc.

25 Q. And who is the other person?



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1 HIGHLY CONFIDENTIAL AEO

2 A. That's me.

3 Q. And when was this photograph  
4 taken?

5 A. This was taken during the  
6 December trip.

7 Q. Was there only one trip in  
8 December?

9 A. From what I recall, yeah.

10 Q. Was that the first trip that  
11 you had taken?

12 A. No.

13 Q. When was the first trip you  
14 had taken?

15 A. I answered that previously,  
16 which was not so long after I met  
17 Jeffrey Epstein for the first time.  
18 So I had been there various times  
19 before these were taken.

20 Q. Do you know how many?

21 A. Like I said earlier,  
22 several. I mean, I...

23 Q. And can you turn to RANSOME  
24 24?

25 A. Mm-hmm.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Who is that?

3 A. That's the wonderful Sarah  
4 Kellen.

5 Q. Did you take these  
6 photographs?

7 A. Jean Luc took these ones.

8 Q. All of them?

9 A. There were -- I had other  
10 photos as well.

11 Q. That came later, a separate  
12 batch?

13 A. Yeah, those are the hard  
14 copies.

15 MS. MENNINGER: I will mark  
16 it now, the second batch,  
17 Defendant's Exhibit 7.

18 (Defendant's Exhibit 7,  
19 Bates stamped Ransome\_000204, was  
20 marked for identification.)

21 MS. MENNINGER: I apologize,  
22 Counsel. We just got these last  
23 night, so I only have one copy  
24 for the witness.

25 MR. GUIRGUIS: That's fine.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. So is Defendant's Exhibit 7  
3 the second batch that you were  
4 referring to?

5 A. Yes.

6 Q. Okay. So I'm just trying to  
7 help be clear.

8 Defendant's Exhibit 6, you  
9 believe were all given to you by Jean  
10 Luc on a disk?

11 A. Well, there's a lot of  
12 photos here. So I took some, I had  
13 some hard copies, and they're all  
14 actually all together, so...

15 Q. Okay, that's fine.

16 A. Yeah. I don't want to be  
17 unclear on which exhibit is which.  
18 There's hundreds here.

19 Q. So the photographs of Sarah  
20 Kellen, you're saying were taken by  
21 Jean Luc, that we were looking at in  
22 RANSOME 24?

23 A. Well, I can recheck the disk  
24 and then I can actually tell you  
25 exactly which ones he took, but I

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1 HIGHLY CONFIDENTIAL AEO

2 can't recall every single photo on  
3 Jean Luc's disk. But there were  
4 multiple photos that were produced  
5 from myself as well.

6 Q. Okay. I will just ask you  
7 about a few.

8 A. Okay.

9 Q. RANSOME 24 is one that you  
10 said was -- of Sarah Kellen, was one  
11 you said you thought Jean Luc had  
12 taken?

13 A. Yes.

14 Q. If you could turn to RANSOME  
15 40. And these are in order, so  
16 hopefully that will be easy.

17 A. Okay. Mm-hmm.

18 Q. Who is represented in this  
19 photograph?

20 A. That's [REDACTED]

21 Q. And where is [REDACTED] in this  
22 photograph, if you know?

23 A. This is by the beach.

24 There's like -- there's like a small  
25 beach, like there's a beach house on

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1                   HIGHLY CONFIDENTIAL AEO

2       the beachfront.

3           Q.       Do you know who took this  
4       photograph?

5           A.       I can't remember.

6           Q.       Okay.   Turning a couple more  
7       pages to RANSOME 42, who is that?

8           A.       That's me.

9           Q.       Are you smoking?

10          A.       I am.   And that was after  
11       the argument that I had with Jeffrey  
12       about me being on lithium and me not  
13       being able to smoke.   And that was the  
14       reason I was really upset, that I  
15       couldn't smoke and that I was being  
16       put on a stupid diet.

17                   So Jeffrey -- yeah, Jeffrey  
18       said it was okay for me to smoke.   I  
19       wasn't allowed to smoke in front of  
20       him.   That was the rule.

21          Q.       Do you know who took this  
22       photograph?

23          A.       I don't remember who took  
24       that photograph.

25          Q.       Is it on the same trip in

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2 December?

3 A. Yes.

4 Q. Turning the next page, is  
5 that also you and Jean Luc?

6 A. That's correct.

7 Q. Do you know who took this  
8 photograph?

9 A. I can't remember.

10 Q. Was it also in the same time  
11 frame when you were upset?

12 A. It was that same December  
13 trip, yes.

14 MS. MENNINGER: We can go  
15 off the record for just a minute.  
16 I think we're swapping out  
17 counsel.

18 (Ms. McCawley left the  
19 hearing and Ms. Syed entered.)

20 (Time noted: 4:56 p.m.)

21 (Recess.)

22 (Time noted: 4:56 p.m.)

23 Q. Looking at RANSOME 44,  
24 you're saying it's in the same time  
25 period?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Yeah.

3 Q. And also true of 45?

4 A. Yes.

5 Q. And 47?

6 A. Yes. It was the same  
7 holiday, the same trip.

8 Q. And do you know who took  
9 these photographs?

10 A. I don't remember.

11 Q. Is that also true for 48,  
12 49, 50, 51, 52?

13 A. I don't remember who took  
14 those photos.

15 Q. Okay. Can you tell from 52  
16 where you were situated on the island?

17 A. It was on the beach.

18 Q. 53, can you tell me who that  
19 is?

20 A. That's [REDACTED]

21 Q. 54 and 55, also [REDACTED]

22 A. That's correct.

23 Q. 69, who is that?

24 A. That's Jeffrey Epstein.

25 Q. Do you know who took this

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1                   HIGHLY CONFIDENTIAL AEO

2    photograph?

3           A.       I can't remember who took  
4    this photograph.

5           Q.       71, is that you?

6           A.       That's correct.

7           Q.       Were you posing for the  
8    photograph?

9           A.       Most people pose for  
10   photographs, every photograph. So I  
11   presume I was posing.

12          Q.       Do you know what Jean Luc's  
13   line of work is?

14          A.       I think he's with modeling  
15   or something, like a modeling agent.

16          Q.       Do you know where he's  
17   based?

18          A.       I have no idea where he's  
19   based.

20          Q.       Did you meet him more than  
21   once?

22          A.       I can't remember if I met  
23   him more than once.

24          Q.       Did you have sexual contact  
25   with him?



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1 HIGHLY CONFIDENTIAL AEO

2 A. No.

3 Q. Did you give him a massage?

4 A. No.

5 Q. Sorry. Going back a little  
6 bit further to RANSOME 121.

7 A. Mm-hmm.

8 Q. Who is in that photograph?

9 A. That's Nadia and [REDACTED]

10 Q. Okay. So Nadia's on the  
11 left?

12 A. That's correct.

13 Q. And [REDACTED] on the right?

14 A. That's correct.

15 Q. Do you know what they're  
16 doing?

17 A. I would love to know what  
18 they're doing myself, personally.

19 Q. Did you take this  
20 photograph?

21 A. I can't remember.

22 Q. Turning to 123, do you know  
23 what is happening in that photograph?

24 A. I think we were just playing  
25 around. I don't think it was serious,

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1 HIGHLY CONFIDENTIAL AEO

2 you know.

3 Q. Okay.

4 A. Just to make that clear.

5 Q. Can I have you look at 126.

6 A. Yeah.

7 Q. Who is in that photograph?

8 A. That's [REDACTED] and [REDACTED]

9 Q. And [REDACTED] is in the  
10 background?

11 A. That's correct.

12 Q. On 127 --

13 A. Mm-hmm.

14 Q. -- who is in that  
15 photograph?

16 A. To the right -- sorry, to  
17 the left it's myself, [REDACTED], Nadia  
18 and then [REDACTED].

19 Q. Is this on the same December  
20 trip?

21 A. That's correct.

22 Q. When did Jean Luc give you  
23 the disk?

24 A. I can't remember when he  
25 gave me the disk.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Do you know if these  
3 photographs are ones that he took?

4 A. They were photos that were  
5 taken during our holiday together, and  
6 they were given to me as a memento, as  
7 a present from John Luc.

8 Q. In person?

9 A. I can't remember.

10 Q. Do you recall the tortoise?

11 A. I can't remember the  
12 tortoise.

13 Q. Apart from [REDACTED], [REDACTED]  
14 Nadia and yourself and Jean Luc, do  
15 you remember anyone else being on this  
16 particular trip?

17 A. There were -- there were  
18 quite a few people that visited the  
19 island. I don't remember their names.

20 Q. Can I have you look at 138.

21 A. Mm-hmm, yeah.

22 Q. Do you know who took that  
23 photograph?

24 A. I don't know who took that  
25 photograph.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Do you know when it was  
3 taken?

4 A. It was taken that December  
5 trip that I took with Ghislaine and  
6 Jeffrey.

7 Q. How do you know that?

8 A. Because I remember what she  
9 was wearing. And I was there. I was  
10 there in person. Like, I was there.

11 Q. So you saw her on the island  
12 wearing those clothes?

13 A. I saw her on the island  
14 wearing those clothes.

15 Q. Did you see her sitting in  
16 this position while on the island?

17 A. I saw her with my own eyes  
18 sitting in this position. I was  
19 probably sitting next to her.

20 Q. But you don't know if you  
21 took the photograph or someone else?

22 A. You know what? Photos are  
23 photos. I don't remember if I took  
24 the photo or if someone else took the  
25 photo.

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1                   HIGHLY CONFIDENTIAL AEO

2                   All I remember is I was with  
3 Ghislaine on this trip. I was  
4 probably sitting next to her in this  
5 photo. I don't know who -- which  
6 specific girl took the photo.

7           Q.       Do you know if it was a girl  
8 who took the photo?

9           A.       I have no idea who took the  
10 photo. I just remember sitting there  
11 and remember being next to Ghislaine  
12 while she was wearing that outfit. I  
13 was there during that time frame.

14          Q.       RANSOME 139, who is that, if  
15 you know?

16          A.       That is Sarah Kellen after  
17 she had a shower, and she's in  
18 Victoria's Secret pajamas that were  
19 supplied to us.

20          Q.       They were supplied to you?

21          A.       Yes. All of the outfits --  
22 there were clothes that were provided  
23 on the island by Jeffrey Epstein,  
24 which were all Victoria's Secret  
25 clothing: bikinis, nightwear.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. You're talking about the  
3 flannel pajamas?

4 A. Yes.

5 Q. Page 140, do you know who  
6 took this photograph?

7 A. I don't remember taking this  
8 photo, but I remember that very well  
9 because we are doing mosaic on that  
10 table. We were busy doing a fish. So  
11 that's what all these apparatus  
12 are. We were doing mosaics.

13 So I don't remember if I  
14 took that photo, but I remember I was  
15 there, because we were all doing  
16 mosaics.

17 Q. 142?

18 A. Mm-hmm.

19 Q. Do you remember who took  
20 that photograph?

21 A. I can't remember -- oh, the  
22 BlackBerry. I can't remember who took  
23 all the photos when I was there. You  
24 can see the mosaics that we were doing  
25 together.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Do you still have that  
3 mosaic?

4 A. No. It was on the big table  
5 that she's sitting at, the large  
6 table. So we actually stuck the  
7 mosaic on the table.

8 Q. 143, do you know who took  
9 that?

10 A. No. We were all there  
11 together.

12 Q. Going through the rest, do  
13 you see any that you know who took the  
14 photo?

15 A. No.

16 MR. GUIRGUIS: Take your  
17 time and look at each onem.  
18 Don't just -- take your time.

19 Can we take a break for just  
20 a minute.

21 (Time noted: 5:06 p.m.)

22 (Recess.)

23 (Time noted: 5:15 p.m.)

24 Q. Did you have a chance to  
25 look through the rest of the

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1 HIGHLY CONFIDENTIAL AEO

2 photographs in Defendant's Exhibit 6?

3 A. No, because I took a break,  
4 so I will continue now.

5 Q. Sure.

6 A. I can't remember who took  
7 these photos. It was during all the  
8 same trip.

9 Q. It was what?

10 A. It was during that same  
11 trip.

12 Q. Can I have you take a look  
13 at RANSOME 154. It's one of the last  
14 few of that exhibit.

15 A. Yes.

16 Q. Do you know where that  
17 photograph was taken?

18 A. I can't remember.

19 Q. Do you know if you were  
20 there?

21 A. I can't remember.

22 Q. Does it appear to be inside  
23 of a shop?

24 A. It appears that way.

25 Q. Do you recall going to any



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1 HIGHLY CONFIDENTIAL AEO

2 shops on that trip?

3 A. I went everywhere with  
4 Jeffrey, so...

5 Q. Did that include shops?

6 A. Yes.

7 Q. Do you recall this shop?

8 A. There were many shops that I  
9 visited. I can't recall this specific  
10 shop.

11 Q. Do you know who the  
12 gentleman is?

13 A. I can't remember his name.

14 Q. And by gentleman, I mean the  
15 person on the left.

16 A. Thank you for clarifying  
17 that.

18 No, I don't recall. I don't  
19 know who this Jeffrey -- Jeffrey's on  
20 the right. I don't know the name, I  
21 can't remember the name of this guy.

22 Q. Wearing a belt?

23 A. Trying on a belt, yeah.

24 Q. Okay. Turning to  
25 Defendant's Exhibit 7.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.        Yes.

3           Q.        Do you recognize these  
4 photographs?

5           A.        I remember this photograph,  
6 the first one, very well.

7           Q.        What is it?

8           A.        It's a box -- it's a box of  
9 condoms that were placed around the  
10 island for the guests to use at their  
11 leisure.

12          Q.        Where on the island was this  
13 one?

14          A.        I can't remember.

15          Q.        Did you take the photograph?

16          A.        I can't remember.

17          Q.        Do you have this photograph  
18 at your house now?

19          A.        I'll have to recheck. I  
20 can't remember where this photo came  
21 from, if it was either on the disk or  
22 by myself. But it was -- I recognize  
23 the box. There were boxes like this  
24 put everywhere.

25          Q.        Did you have any photographs

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1                   HIGHLY CONFIDENTIAL AEO

2           contained on your computer?

3           A.        No.

4           Q.        Where were photographs that  
5           you gathered together to produce?

6           A.        You've got them all there.  
7           I just need to -- all the photos that  
8           I have, you guys have. So I don't  
9           know.

10          Q.        Where were they? Where did  
11          you find them?

12          A.        My photos?

13          Q.        Yes.

14          A.        In my storage.

15          Q.        Where is that?

16          A.        It was in England. It was  
17          in my private box where I keep all my  
18          photos from, you know, when I was a  
19          baby to now, so...

20          Q.        Is that with your mother?

21          A.        No, that wasn't with my  
22          mother.

23          Q.        Where is the storage in  
24          London?

25          A.        The storage was in Ramsgate.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. And where did it go?

3 A. It's now in my current  
4 residency in Spain.

5 Q. When you gathered the photos  
6 together and gave them to your lawyer  
7 to give to us, did you gather them in  
8 Spain or in London?

9 A. My stuff was in London and I  
10 moved to Barcelona. I was currently  
11 staying in Barcelona with Peter, and  
12 we were just going to commute between  
13 St. Albans and Barcelona.

14 When I came forward, I knew  
15 that I had photos that I had taken and  
16 I knew that I had materials.

17 At that same time is --  
18 during that same time, I contacted  
19 Maureen Callahan. When I contacted  
20 Maureen Callahan, there were people  
21 that were following me in Barcelona,  
22 and I got scared.

23 I then contacted my estate  
24 agent. I got my entire flat packed up  
25 in St. Albans and moved to Spain. I

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1                   HIGHLY CONFIDENTIAL AEO  
2       was too frightened to actually fly  
3       back myself and pack, so I stayed in  
4       Barcelona and a company packed my  
5       things for me and brought them to me.

6           Q.       Okay. So they were in St.  
7       Albans. You had them all packed up  
8       and sent to you in Barcelona, where  
9       you relocated?

10          A.       That's correct.

11          Q.       When you were interacting  
12       with Ms. Callahan, did you send her  
13       any photographs?

14          A.       Sorry, sorry. Who is  
15       Ms. Callahan? Sorry. I'm just really  
16       tired. I'm really bad with names.  
17       Callahan first name, please.

18          Q.       Do you know who Ms. Callahan  
19       is?

20          A.       It's really late, I've had a  
21       really long day, and I've said  
22       numerous times throughout the day that  
23       I am slightly dyslexic and I have  
24       difficulty with names.

25                   Can you just tell me

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1 HIGHLY CONFIDENTIAL AEO

2 Ms. Callahan's first name so I can  
3 answer the question, please.

4 Q. Is Ms. Callahan the name of  
5 the individual that you said worked  
6 for the New York Post?

7 A. Oh, sorry. Maureen  
8 Callahan, yes.

9 Q. Did you send Ms. Callahan  
10 any photographs?

11 A. Not of this, no. Not of  
12 this.

13 Q. Did you send her photographs  
14 of something else?

15 A. I did. I sent her a photo  
16 of my ex-boyfriend and myself.

17 Q. Who was your ex-boyfriend?

18 A. [REDACTED]

19 Q. Who is that?

20 A. [REDACTED]

21 [REDACTED].

22 [REDACTED]

23 [REDACTED]

24 Q. And when was he your  
25 boyfriend?

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1 HIGHLY CONFIDENTIAL AEO

2 A. In Edinburgh, before I moved  
3 to New York.

4 Q. Why did you send  
5 Ms. Callahan a photograph of yourself  
6 and your boyfriend?

7 A. Because I wanted to show her  
8 I was telling the truth about  
9 everything. I didn't want to send a  
10 journalist anything regarding Jeffrey  
11 Epstein because I -- I -- well, I sent  
12 her a picture of [REDACTED] and I  
13 to show that I was telling my story,  
14 that my story was straight from the  
15 beginning, that I know the people I  
16 mentioned, etcetera. So...

17 Q. So [REDACTED] figured into the  
18 story that you had relayed to  
19 Ms. Callahan?

20 A. Yes, because [REDACTED] and I  
21 had a breakup, and that was one of the  
22 reasons I moved to New York.

23 Q. Have you had contact with  
24 [REDACTED] since then?

25 A. Throughout the years on and

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1 HIGHLY CONFIDENTIAL AEO

2 off, but, no, I don't have any contact  
3 with him now.

4 Q. Apart from the photograph  
5 with yourself and [REDACTED] did you send  
6 Ms. Callahan any other documents or  
7 photographs?

8 A. I can't remember.

9 Q. Did you have contact with  
10 any other media person?

11 A. I can't remember.

12 Q. Did you meet with anyone  
13 from the Daily Mail?

14 A. No.

15 Q. From the Mirror?

16 A. No.

17 Q. Did you speak to anyone from  
18 the Daily Mail?

19 A. No.

20 Q. Anyone from the Mirror?

21 A. No.

22 Q. The Independent?

23 A. No.

24 Q. The Guardian?

25 A. No.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. When you got these boxes of  
3 items from St. Albans and you looked  
4 at them while you were in Barcelona;  
5 is that right?

6 A. I --

7 MR. GUIRGUIS: Objection.

8 A. I looked at them -- I  
9 vaguely went through the photos in St.  
10 Albans. I knew what was there. Yeah,  
11 I -- they were there, so I saw them.  
12 I went through my photos, like all my  
13 memorabilia that had been in storage.  
14 But that's about it.

15 Q. And you selected photographs  
16 to send to your lawyers to give to us,  
17 correct?

18 A. I was asked to -- well I  
19 just provided every -- all the  
20 evidence that I had.

21 Q. When did do you that?

22 MR. GUIRGUIS: I'm going to  
23 object. If you're talking about  
24 a communication between client  
25 and counsel -- is that what

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1 HIGHLY CONFIDENTIAL AEO

2 you're asking for?

3 MS. MENNINGER: No. I'm  
4 asking when did you provide all  
5 of your evidence, which is what  
6 she said that she had.

7 MR. GUIRGUIS: The photos --  
8 you mean when she provided them  
9 to her counsel?

10 MS. MENNINGER: Yes.

11 Q. When did you provide them to  
12 your counsel?

13 MR. GUIRGUIS: Objection.

14 Do not answer.

15 Q. Did you receive a subpoena  
16 in this case?

17 A. I don't know what a subpoena  
18 is.

19 MS. MENNINGER: Let's mark  
20 Defendant's Exhibit 8.

21 (Defendant's Exhibit 8,  
22 Notice of Service of Rule 45  
23 Subpoena and Notice of Deposition  
24 of Sarah Ransome, was marked for  
25 identification.)

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Have you seen this document  
3 before?

4 A. Let me just have a look,  
5 okay. I don't remember.

6 Q. Have you ever seen this  
7 document before?

8 MR. GUIRGUIS: Objection,  
9 asked and answered.

10 MS. MENNINGER: I'm sorry.  
11 I didn't hear an answer.

12 A. I've seen various papers. I  
13 remember specifically seeing the  
14 depositions. There's been millions of  
15 documents. I can't remember which  
16 specific documents I've seen.

17 Q. Okay. If I could have you  
18 turn to the last three pages, where it  
19 says "Documents to be Produced."

20 A. Mm-hmm.

21 Q. Have you seen that list  
22 before?

23 A. Yes, I have.

24 Q. Did you conduct a search of  
25 your records to produce documents?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Yes, I believe that I  
3 produced every single document I can.

4 Q. After looking at this list,  
5 did you go back and look through your  
6 photographs in Barcelona?

7 A. As I said, I looked at  
8 everything I had during that time  
9 frame and I produced everything I can  
10 during that time frame that I was with  
11 Jeffrey.

12 Q. Just tell me what you did in  
13 order to make sure you had produced  
14 everything that was called for in this  
15 list.

16 A. Okay. So I went through a  
17 box of about over 5,000 photos that I  
18 had, and I went through every single  
19 photo, every single disk, everything  
20 that I had.

21 I went through all my  
22 emails.

23 I tried to look for the  
24 BlackBerry sim card, which I had hoped  
25 that I had kept, which had all

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1                   HIGHLY CONFIDENTIAL AEO  
2           Ghislaine's messages on and Jeffrey's  
3           and Lesley's, and stupidly I misplaced  
4           that, which is really annoying.

5                   But I myself, you know,  
6           considering my objective is to get  
7           these people and get justice for the  
8           abuse that Ghislaine caused me -- and  
9           Jeffrey -- I have given as sufficient  
10          evidence that I have.

11           Q.       Did you look for all  
12          photographs taken by you or containing  
13          any image of you at or near any home,  
14          business, private vehicle or any other  
15          property owned or controlled by  
16          Jeffrey Epstein, as indicated in  
17          paragraph 7?

18           A.       Yes.

19           Q.       Likewise in paragraph 8, did  
20          you look for any photographs that  
21          depict any home, business, private  
22          vehicle or any other property owned or  
23          controlled by Jeffrey Epstein?

24           A.       Yes.

25           Q.       And you did that after

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1 HIGHLY CONFIDENTIAL AEO

2 reviewing this list of documents?

3 A. Yeah, I mean, I received the  
4 list and I've complied with  
5 everything. I have given absolutely  
6 everything that I can to you guys.

7 Q. Have you given all of your  
8 passports, travel visas or permissions  
9 to live, work or study in other  
10 country?

11 A. I haven't given my current  
12 passports, but I've given everything  
13 that I have; documents, passports that  
14 I had during, commercial plane  
15 tickets.

16 Q. Do you have any visas?

17 A. I have a visa coming here,  
18 but that's the only visa that I have.

19 Q. Do you have any visa  
20 applications?

21 A. No.

22 Q. Do you have any other plane  
23 tickets or boarding passes for the  
24 period 2006 to 2007?

25 A. No.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Turning back to Defendant's  
3 Exhibit 7, these photographs, do you  
4 know what the second photograph  
5 represents?

6 A. Yes, that's me playing with  
7 Ghislaine's dog, a Yorkshire Terrier.

8 Q. Where are you in this  
9 picture?

10 A. I was in the girls' bedroom  
11 where we all slept, and I was on my  
12 bed playing with Ghislaine's dog.

13 Q. When was this photograph  
14 taken?

15 A. I can't remember.

16 Q. Was it the same trip as  
17 Defendant's Exhibit 6?

18 A. I can't remember.

19 Q. Okay. Do you know who took  
20 the photograph in 205?

21 A. I can't remember.

22 Q. 206?

23 MR. GUIRGUIS: Objection to  
24 form.

25 A. I can't remember.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. 207?

3 MR. GUIRGUIS: Objection to  
4 form.

5 A. Can't remember.

6 Q. Who is depicted in 208?

7 A. [REDACTED]

8 Q. And?

9 A. Oh, and me. That's me.

10 Q. And 209?

11 A. Sorry. That's me, [REDACTED]  
12 Jean Luc, and one of Jeffrey's staff  
13 members in the background.

14 Q. Turning to 213, is that you?

15 A. Yes, that's me.

16 Q. And where are you located?

17 A. I'm trying to remember  
18 specifically where that is on the  
19 island. I think it's near the main  
20 house, there was a -- yeah, there was  
21 a fountain near the main house.

22 Q. Do you know whether you took  
23 this?

24 A. I don't remember.

25 Q. Do you know whether you had



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1 HIGHLY CONFIDENTIAL AEO

2 this photograph on the disk?

3 A. I think these were one of my  
4 photos.

5 Q. Was it in hard copy, like an  
6 actual print?

7 A. I can't remember. I have to  
8 double check if there are more copies.  
9 But I think -- yeah, I'm pretty sure  
10 this is a hard copy.

11 Q. Does it have a back, like  
12 when it was developed or printed?

13 A. I can check.

14 Q. Is it back in Barcelona?

15 A. No.

16 Q. Where are these photographs?

17 A. I have given all the  
18 photographs to my lawyers.

19 Q. Okay. How did you do that?  
20 By handing them over in person?  
21 Sending them by mail?

22 A. Handing them over in person.

23 Q. Was this some type of photo  
24 shoot represented in RANSOME 214, 215,  
25 216?

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2 A. Sorry. 214, this is not a  
3 photo shoot. We were just messing  
4 around on the island.

5 Q. Do you know who you were  
6 messing around with?

7 A. We were all having fun  
8 together.

9 Q. Were there photographs of  
10 other people taken around the same  
11 time that you have?

12 A. I have given all the photos  
13 that I have.

14 Q. In other words, if you were  
15 messing around with [REDACTED] at this  
16 time and there's a photo of [REDACTED]  
17 that you have, did you provide that?

18 A. I provided every single  
19 photograph that I have.

20 Q. And 218, was that a photo  
21 shoot?

22 A. That was me when I was  
23 naked, actually, and I had a towel  
24 around me. So I think I just had a  
25 massage by Jeffrey, because I was

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2 naked underneath the towel.

3 Q. Also 219 and 220?

4 A. Yep.

5 Q. Those were just after a  
6 massage?

7 A. Yeah. You can tell I look  
8 really, really happy to be out of  
9 there, so...

10 Q. Do you know which trip that  
11 was on?

12 A. I can't remember which trip.

13 Q. And page RANSOME 221, who is  
14 in that photograph?

15 A. Myself, [REDACTED] and Jean Luc,  
16 and a staff member in the background.

17 Q. Do you know what's happening  
18 in 223?

19 A. Oh, no. Yes. So Jeffrey  
20 provided cosmetics for all the girls.  
21 We had to look our best. So that was  
22 a Crème de la Mer facial mask that he  
23 regularly gave to the girls so their  
24 skin was nice. We had top-line  
25 cosmetics in our bathroom to use at

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2 our disposal.

3 Q. So in 223 and 224 you're  
4 doing a facial mask?

5 A. I'm attempting to do a  
6 facial. It's not going that well.

7 Q. And going to 229, do you  
8 know where that was taken?

9 A. That was on Jeffrey's  
10 speedboat to -- going to the island.

11 Q. Do you know when?

12 A. I don't recall which date  
13 that was.

14 Q. Did you have any contact  
15 with the mail on Sunday?

16 MR. GUIRGUIS: Objection.

17 Huh?

18 Q. Did you ever have any  
19 contact with the mail on Sunday?

20 A. No.

21 MR. GUIRGUIS: You mean the  
22 mail as in postage? I'm sorry.

23 MR. PAGLIUCA: The  
24 newspaper.

25 A. No, no, I haven't had

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2 correspondence with them, no.

3 Q. Apart from Ms. Callahan,  
4 have you had contact with any member  
5 of the press?

6 A. Oh, I contacted Bianca  
7 Jagger because she runs a foundation  
8 that helps abused girls.

9 Q. Okay. Did you have any  
10 contact with any other member of the  
11 press?

12 A. No.

13 Q. When was the last time that  
14 you saw Ghislaine Maxwell?

15 A. In New York, before I left  
16 in 2007.

17 Q. How long before you left?

18 A. I can't remember.

19 Q. What time of year was it?

20 A. When I left?

21 Q. Yes.

22 A. It was the end of April.

23 Q. How do you know that?

24 A. Because I am -- on some of  
25 the emails, I wanted to go home.

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2 Actually, back to my mom.

3 Q. When's the last time you  
4 spoke to Ghislaine Maxwell?

5 A. Before I left New York.

6 Q. Okay. Do you know how long  
7 before you left?

8 A. I can't remember.

9 Q. Tell me what you recall  
10 about the last time you saw Ghislaine  
11 Maxwell.

12 A. I can't remember.

13 Q. Where it was?

14 A. I can't remember my last  
15 interaction with Ghislaine.

16 Q. Or the last time you spoke  
17 with her?

18 MR. GUIRGUIS: Objection,  
19 asked and answered.

20 A. I can't remember the last  
21 time I spoke to her. Yeah, I don't  
22 remember the specifics.

23 Q. Were you living with Adam at  
24 the time you last spoke to Ghislaine?

25 A. Yes.

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2 Q. What did she say to you when  
3 you last spoke to her --

4 MR. GUIRGUIS: Objection,  
5 asked and answered.

6 Q. -- when you were living with  
7 Adam?

8 MR. GUIRGUIS: Objection,  
9 asked and answered.

10 A. I can't remember.

11 Q. Did you speak to her about  
12 FIT?

13 MR. GUIRGUIS: Objection,  
14 asked and answered.

15 A. I had spoken to her numerous  
16 times about FIT.

17 MS. MENNINGER: Counsel,  
18 when did I already ask her, did  
19 you speak to her about FIT.

20 MR. GUIRGUIS: You've asked  
21 her --

22 THE WITNESS: Several times.

23 MS. MENNINGER: I'm not  
24 talking to you.

25 MR. GUIRGUIS: Okay.

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2 THE WITNESS: That was rude.

3 MR. GUIRGUIS: It was, and  
4 I'm not going to answer her  
5 question now.

6 You can proceed, Counsel.

7 MS. MENNINGER: When did I  
8 last ask her about --

9 MR. GUIRGUIS: I'm not going  
10 to answer your question. I'm not  
11 being deposed. I'm not arguing  
12 objections with you. You have  
13 asked her about it before; that's  
14 why I made my objection.

15 You can proceed with your  
16 questioning whenever you like,  
17 Counsel.

18 MS. MENNINGER: Thank you.

19 MR. GUIRGUIS: Feel free to  
20 search the transcript later.

21 MS. MENNINGER: I would like  
22 to mark as Defendant's Exhibit 8.

23 (Defendant's Exhibit 8,  
24 Bates stamped RANSOME\_000004, was  
25 marked for identification.)



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2 Q. Do you recognize Defendant's  
3 Exhibit 8?

4 A. Yes, I do.

5 Q. What is it?

6 A. They're emails.

7 Q. Did you find these emails  
8 and produce them?

9 A. That's correct.

10 Q. Where did you find them?

11 A. On my old email account that  
12 I had during that time.

13 Q. What was your old email  
14 account?

15 A. [REDACTED]

16 Q. When did you stop using that  
17 email account?

18 A. A guess a year or a few  
19 months after. I can't recall when I  
20 stopped using it.

21 Q. Do you see on the first page  
22 where it says RANSOME 004, there are  
23 two emails in the chain which are  
24 visible?

25 A. That's correct.

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2 Q. And did you produce the  
3 other emails between those two that  
4 are not visible?

5 A. Yes.

6 Q. When did you do that?

7 A. The same time I provided all  
8 the emails originally.

9 Q. Okay. So you believed that  
10 you produced six emails of  
11 conversation between yourself and  
12 Natalya Malyshev?

13 MR. GUIRGUIS: I'm going to  
14 object and just ask for  
15 clarification.

16 I'm not trying to give you a  
17 hard time on this one. When you  
18 say produced, you're asking the  
19 witness if she provided it to her  
20 attorneys, right? Because  
21 obviously the attorneys produced  
22 the documents in this case.

23 MS. MENNINGER: Correct.

24 MR. GUIRGUIS: So just --  
25 she didn't produce anything,

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2 obviously.

3 So she's asking you did you  
4 collect this email and give it to  
5 the lawyers, I guess is the  
6 question.

7 A. Yeah, I collected all --  
8 all -- everything I had, I gave to my  
9 lawyers.

10 Q. Okay. So you believe you  
11 gave six emails between yourself and  
12 Natalya Malyshev to your attorneys?

13 A. Yes, I gave all my evidence.

14 Q. Okay. And --

15 MR. GUIRGUIS: I'm going to  
16 object to that last question also  
17 as misrepresenting the testimony.

18 MS. MENNINGER: What was  
19 misrepresenting what testimony?

20 MR. GUIRGUIS: You're saying  
21 that she gave six emails.

22 MS. MENNINGER: Well, let's  
23 go back, then, and get the  
24 testimony right.

25 Q. On RANSOME 004, how many

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2 emails between yourself and Natalya  
3 Malyshev do you see total?

4 There's one at 1:04 a.m.,  
5 correct?

6 MR. GUIRGUIS: Counsel,  
7 you're doing the exact thing that  
8 I just tried to avoid confusion  
9 on, right?

10 There's a difference between  
11 what was produced to you -- and  
12 apparently and you're saying that  
13 six emails were produced to  
14 you --

15 MS. MENNINGER: No, I was  
16 not saying that.

17 MR. GUIRGUIS: -- which  
18 she's providing to her counsel.

19 MS. MENNINGER: No, I'm not  
20 saying that. So I'm trying to  
21 get it straight now.

22 Q. There's an email indicated  
23 on the first page from Nataly to you  
24 at 1:04 a.m. on February 3rd, 2007,  
25 correct?

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2 A. Mm-hmm. Yes.

3 Q. And you can read the text of  
4 that email, correct?

5 A. Yes, I can.

6 Q. And the next email down says  
7 "Sarah Ransome" at 4:07 -- at 4:01  
8 p.m.

9 A. Mm-hmm.

10 Q. Can you read that email?

11 A. No, because it's on Yahoo.  
12 It's a technological thing. You can't  
13 read all emails.

14 Q. So did you produce the  
15 February '04, '07, 4:01 p.m. email  
16 from yourself to Nataly Malyshev to  
17 your attorneys?

18 MR. GUIRGUIS: Objection to  
19 the use of the word produce.

20 A. I've given all my email  
21 correspondence to my lawyers.

22 Q. Did you give that email to  
23 your lawyer?

24 A. I've given all my emails to  
25 my lawyers.

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2 Q. Okay. The next email down  
3 says "Sarah Ransome, February 5, 2007,  
4 at 10:09 p.m."

5 Can you read the text of  
6 that email on this document?

7 A. Mm-hmm.

8 Q. What does the 10:09 p.m.  
9 email say?

10 A. As I've specified before,  
11 this is a screenshot, okay, of the  
12 actual Yahoo email. This is a  
13 screenshot. So technically I can't  
14 read that anyways, seeing as it's a  
15 screen shot.

16 Q. Okay.

17 A. This isn't a computer. I  
18 can't tap into that email on a page  
19 because it's a screen shot.

20 Q. Did you give a February 6th,  
21 '07, 2:00 a.m. email between yourself  
22 and Nataly Malyshev to your attorneys?

23 A. I have handed all over my  
24 evidence to my attorneys.

25 Q. Did you give a February 8,

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2           2007, 9:12 p.m. email from yourself to  
3           Nataly Malyshev to your attorneys?

4           A.       I have given all my evidence  
5           to my attorneys.

6                   MS. MENNINGER: I'm going to  
7           show you Defendant's Exhibit 10.

8                   (Defendant's Exhibit 10,  
9           Bates stamped RANSOME\_000006, was  
10          marked for identification.)

11          Q.       Do you recognize Defendant's  
12          Exhibit 10?

13          A.       Yes.

14          Q.       What is it?

15          A.       It's an email correspondence  
16          between Lesley Groff and myself.

17          Q.       On the second page, RANSOME  
18          0008, do you see other emails with  
19          headings but no text visible in the  
20          screenshot?

21          A.       Mm-hmm.

22          Q.       Did you give each one of  
23          those emails to your attorneys?

24          A.       I have given all my  
25          correspondence to my attorneys.

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2 Q. Do you see in the "Smart  
3 View" column on the left side a folder  
4 named "Pumla Griszell"?

5 A. Yes, I do.

6 Q. Does that folder contain  
7 your correspondence with Pumla  
8 Griszell?

9 A. I didn't even know that  
10 folder was there, but I presume so,  
11 which is why I would have created it  
12 in the first place.

13 Q. And it also shows a  
14 substantial number of documents in  
15 your Inbox.

16 A. Yes.

17 Q. Did you search your Inbox  
18 for documents responsive to the  
19 subpoena that I showed you a little  
20 while ago?

21 A. I did. I wanted to be  
22 thorough with my research, so I,  
23 during that time frame, went through  
24 every single email.

25 Q. You went through each one?



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2 A. I went through all of my  
3 emails to make sure I gave all my  
4 evidence to my lawyers.

5 Q. Did you search for keywords  
6 or did you just read each email?

7 A. I read each email.

8 Q. And did you print out each  
9 email?

10 A. I didn't print out. I saved  
11 them to a USB stick.

12 Q. All of them or just the ones  
13 that you thought were needed?

14 A. Just the ones that were  
15 for -- just anything related to  
16 Jeffrey, I sent over.

17 Q. And I think you testified  
18 earlier you believe you still have  
19 your FIT application in an email?

20 A. I haven't read it. I'm  
21 assuming I have it.

22 MS. MENNINGER: I want to  
23 show you Defendant's Exhibit 11.

24 (Defendant's Exhibit 11,  
25 Maureen Callahan article, was

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2 marked for identification.)

3 A. Oh, it's 9th of October,  
4 sorry.

5 Q. Do you recognize this  
6 document?

7 A. Let me go to the last  
8 sentence. That catchphrase that I  
9 mentioned earlier, as I said earlier,  
10 I couldn't remember the contents of  
11 the article earlier. I do apologize,  
12 I got the date wrong from the 16th.  
13 It was actually the 9th of October. I  
14 couldn't remember the specific date.

15 I remember the specific  
16 statement that really struck a chord  
17 with me, which was, "The true number  
18 of Epstein's victims will never be  
19 known."

20 Q. So you believe this is the  
21 document by Maureen Callahan that you  
22 read last October that caused you to  
23 come forward?

24 A. I'm presuming so, because  
25 I've gone straight to the bank, and

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2 the sentence that I told you that I  
3 remembered is this. So I'm assuming,  
4 yes, that it's the same.

5 Q. And this article had a big  
6 impact on you because it caused you to  
7 come forward, I think you testified  
8 earlier; is that correct?

9 A. That's correct.

10 Q. All right. Do you also see  
11 on that last page, just right where  
12 you were, there's a little box on the  
13 left hand side. Can you read that out  
14 loud, beginning "Today Jeffrey  
15 Epstein..."

16 Do you see that in bold  
17 letters on that last page?

18 A. Oh.

19 Q. Can you just read that  
20 sentence to us?

21 A. "Today Jeffrey Epstein is a  
22 free man, albeit one who routinely has  
23 civil lawsuits brought against him by  
24 young women out of court."

25 MS. MENNINGER: Okay.

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2 Defendant's Exhibit 12.

3 (Defendant's Exhibit 12,  
4 website printout titled How to  
5 Apply, was marked for  
6 identification.)

7 Q. Do you recognize this  
8 document?

9 A. I've seen it before, yes.

10 Q. And what do you recognize it  
11 be?

12 A. It's the application how you  
13 apply to FIT.

14 Q. It talks about students  
15 applying to different parts of the  
16 school, including arts and design or  
17 business and technology.

18 Do you recall if you were  
19 applying to a particular area at FIT  
20 or a general admission?

21 A. I wanted to specialize in  
22 fashion designing.

23 Q. Do you know if that was a  
24 special area?

25 A. Yes, it was. FIT's the

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2       financial -- fashion school, so yeah.

3           Q.       Did you visit the building  
4       where FIT is located?

5           A.       Yes, I did.

6           Q.       Did you attend classes  
7       there?

8           A.       No.

9           Q.       I mean did you visit a  
10       class. I know you didn't enroll, but  
11       did you visit a class?

12          A.       No, I didn't. But I went to  
13       the university, had a look around.

14          Q.       Did you take a tour?

15          A.       Not per se. I mean, I went  
16       around, I looked at the university. I  
17       didn't go on a big personalized tour  
18       with a specific person, no.

19          Q.       Did you talk to any of the  
20       teachers there?

21          A.       No, I didn't.

22          Q.       Do you recall there being  
23       multiple steps for applications to  
24       FIT?

25          A.       There's multiple steps on

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2           any college application form.

3           Q.        Do you remember what those  
4           steps were when you were applying?

5           A.        No.

6           Q.        Do you remember an original  
7           application which had details?

8           A.        I can't remember the  
9           original application form, no.

10          Q.        Do you remember there being  
11          a separate essay portion?

12          A.        Yes, I do remember that.

13          Q.        Do you remember a separate  
14          portion that relates to students who  
15          are applying who are not U.S.  
16          citizens?

17          A.        I can't remember that. I  
18          can't remember the specific form.

19          Q.        Do you remember filling out  
20          any special paperwork for someone who  
21          was applying who was not a U.S.  
22          citizen?

23          A.        No, there was no paperwork  
24          as such for that. Jeffrey Epstein was  
25          sorting that out for me with his

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2 connections at FIT.

3 Q. So you don't believe you  
4 filled that part out?

5 MR. GUIRGUIS: Objection.

6 A. I said I can't remember  
7 filling that part out.

8 Q. Do you remember getting a  
9 copy of your transcript from Queen  
10 Margaret University?

11 A. I haven't got my transcripts  
12 yet, but I can get them.

13 Q. Do you remember submitting  
14 them to FIT?

15 A. I can't remember.

16 Q. Did you get a degree from a  
17 school in Edinburgh, high school?

18 A. So I finished all my high  
19 school qualification, which, you know,  
20 my grades were good enough to get into  
21 psychology and sociology in Edinburgh.

22 Q. What was the name of your  
23 high school?

24 A. Grantown Grammar School.

25 Q. Did you get a transcript

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2 from that school to provide to FIT?

3 A. I think I was in the process  
4 of getting my transcripts from Queen  
5 Margaret. I did have a copy of my  
6 high school grades as well. When you  
7 fill out an application, you submit  
8 all your grades, high school.

9 Q. And that's the one in  
10 Scotland?

11 A. Yes, that's correct.

12 MS. MENNINGER: I think I've  
13 only got a couple more questions,  
14 but I got my piles messed up.  
15 Can we take a two-minute break  
16 and I can get organized and  
17 finished.

18 (Time noted: 5:54 p.m.)

19 (Recess.)

20 (Time noted: 6:07 p.m.)

21 MS. MENNINGER: I'm going to  
22 mark a new exhibit Defendant's  
23 Exhibit 13.

24 (Defendant's Exhibit 13,  
25 Bates stamped RANSOME\_000007 was



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2                   marked for identification.)

3           Q.       Do you recognize this  
4 document?

5           A.       Yes, I do.

6           Q.       What is it?

7           A.       It was an email sent to my  
8 friend Pam.

9           Q.       Is that different than Pam  
10 that you were with on the island?

11          A.       I was never with Pam on the  
12 island. It was [REDACTED].

13          Q.       Do you remember testifying  
14 about someone named Pam?

15          A.       Pam was my friend in New  
16 York.

17          Q.       Is that the same person you  
18 were writing here, or is that a  
19 different person?

20          A.       It's the same person; it's  
21 just I called her Pam. It's a South  
22 African name. She's South African.

23          Q.       How did you know Pam?

24          A.       I met her in New York.

25          Q.       Do you know whether you paid

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2       for your plane ticket to come back to  
3       New York from South Africa in February  
4       of '07?

5           A.       I didn't pay for my ticket.

6           Q.       You did not?

7           A.       No.

8           Q.       Do you see in your email  
9       exchange in Defendant's Exhibit 13  
10       that you wrote to Pam on February 8th  
11       of '07, "Not going to Miami anymore,  
12       clearly, and have to pay for me flight  
13       back."

14                   It's in the second paragraph  
15       towards the bottom.

16          A.       Mm-hmm.

17          Q.       Did you write that?

18          A.       Yes.

19          Q.       But you did not, in fact,  
20       pay for your flight back?

21          A.       No.

22          Q.       Do you know what you meant  
23       by "Not going to Miami anymore,  
24       clearly..."?  
25

25          A.       I can't remember what that

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2       whole Miami thing was about. It never  
3       came about, so I can't remember the  
4       specific details on Miami. But it was  
5       via Jeffrey Epstein.

6           Q.       Okay. How did it happen  
7       that you were writing, "I'm going to  
8       have to pay for me flight back," but  
9       you did not, in fact, pay for your  
10      flight back?

11          A.       Because Jeffrey Epstein and  
12      I had a fight about my weight. So  
13      that was probably during the argument,  
14      the time frame that I had the argument  
15      with Jeffrey. He said that he refused  
16      to pay for my flight back if I didn't  
17      get down to 52 kilograms.

18          Q.       And how did it come about  
19      that you did not pay for your flight  
20      back?

21          A.       I carried on losing weight  
22      to try and get to the goal that  
23      Jeffrey and Ghislaine had set for me,  
24      which is 52 kilograms.

25          Q.       How does that relate to

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2 payment for a flight?

3 MR. GUIRGUIS: Objection.

4 A. Well, I didn't pay for that  
5 flight because Jeffrey was financing  
6 me, so I wouldn't have had the money  
7 to pay for my own flight back.

8 Q. But you said you were "going  
9 to have to pay for my flight back,"  
10 right?

11 A. That's correct.

12 Q. And then what changed?

13 MR. GUIRGUIS: Objection,  
14 asked and answered.

15 A. I made up with Jeffrey. I  
16 tried to meet my target weight of  
17 52 kilograms.

18 Q. And how did you make up with  
19 him?

20 A. I can't remember if it was  
21 telephone call or email or message,  
22 but there were various phone calls  
23 that were made to my family home from  
24 Ghislaine and Jeffrey during that time  
25 frame.

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1                   HIGHLY CONFIDENTIAL AEO

2                   It was a very delicate time  
3 because my family were up in arms the  
4 fact I was told to be 52 kilograms,  
5 which is not -- it can't be achievable  
6 with my body frame, and they saw me  
7 getting very ill.

8                   And I didn't have the funds  
9 to buy a flight back, so I had to do  
10 what Ghislaine and Jeffrey told me do.

11           Q.       What did you do?

12           A.       Continue to lose weight.

13           Q.       Did you see any medical  
14 professionals while you were in South  
15 Africa?

16           A.       No.

17           Q.       How did you communicate to  
18 Jeffrey that you had decided to  
19 continue losing weight?

20           A.       So Jeffrey, Ghislaine,  
21 again, we all corresponded by  
22 telephonic call, BBM, message, my  
23 house phone. I decided to lose  
24 weight. I was given an ultimatum that  
25 either I do it or I'm finished. At

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2 that point I had no option.

3 Q. If you wanted the flight  
4 back.

5 A. If I wanted the flight back.  
6 I had all my stuff in New York, I had  
7 my life in New York, I was going to  
8 FIT.

9 I didn't have any finances;  
10 Jeffrey was funding me. So I was  
11 stuck. I either had to do what  
12 Ghislaine and Jeffrey told me do or I  
13 was stuck, really.

14 Q. You were stuck at your  
15 father and stepmother's house in South  
16 Africa, where you grew up?

17 A. I didn't grow up with my  
18 father and my stepmother.

19 Q. You grew up in South Africa?

20 A. I grew up in Johannesburg.

21 Q. When you say you were stuck,  
22 you're describing a time you were in  
23 South Africa?

24 A. I'm describing a time I was  
25 on holiday visiting my family, that

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1 HIGHLY CONFIDENTIAL AEO

2 Jeffrey paid for.

3 Q. Okay. Did you finish your  
4 answer?

5 A. Sorry, I just read here.  
6 I'm describing a time that I was on  
7 holiday visiting my family, that was  
8 paid for by Jeffrey and Ghislaine.  
9 They financed my ticket. They  
10 financed every ticket. They financed  
11 my whole lifestyle.

12 Q. Ghislaine financed your  
13 ticket?

14 A. Well, they were one entity.  
15 Ghislaine is Jeffrey's right-hand  
16 woman. They --

17 Q. When did Ghislaine finance  
18 this ticket?

19 A. It was through Jeffrey's  
20 company that she worked with.

21 Q. Did you correspond by email  
22 with Ghislaine about financing this  
23 ticket?

24 A. No.

25 Q. You searched for emails with

Highly Confidential

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1 HIGHLY CONFIDENTIAL AEO

2 yourself and Ghislaine, correct?

3 A. That's correct.

4 Q. And you found none, correct?

5 A. That's correct.

6 Q. You found emails between  
7 yourself and Lesley Groff about the  
8 plane ticket back, correct?

9 A. That's correct.

10 Q. But none with Ghislaine?

11 A. I never said once today that  
12 I had email communication with  
13 Ghislaine.

14 Q. But you just said that  
15 Ghislaine financed your holiday in  
16 South Africa. And what is your basis  
17 for saying that?

18 MR. GUIRGUIS: Objection.

19 She did not say that Ghislaine  
20 financed it.

21 Q. What is your basis for  
22 referring to Ghislaine financing your  
23 holiday in South Africa?

24 MR. GUIRGUIS: Objection.

25 A. So Ghislaine is Jeffrey's



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1                   HIGHLY CONFIDENTIAL AEO  
2       right-hand man, so she -- so we report  
3       to her. I told them I wanted to go  
4       and see my family. They paid for my  
5       flight.

6           Q.       You told them when they were  
7       together in the same place?

8           A.       I can't remember the  
9       specific location. I just wanted to  
10      go on holiday to see my family, which  
11      Ghislaine and Jeffrey paid for.

12          Q.       How did Ghislaine pay for  
13      it?

14          A.       I don't know. You should  
15      ask Ghislaine.

16          Q.       Did she write a check?

17          A.       You should ask Ghislaine.

18          Q.       Did she put it on a credit  
19      card?

20                   MR. GUIRGUIS: Objection.

21          A.       You should ask Ghislaine.

22          Q.       Do you have any idea how  
23      Ghislaine Maxwell paid for your trip  
24      to South Africa?

25                   MR. GUIRGUIS: Objection.

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2 A. You should ask Ghislaine.

3 Q. Is that an answer?

4 MR. GUIRGUIS: Objection.

5 Q. Do you have an answer?

6 MR. GUIRGUIS: Objection.

7 A. You should ask Ghislaine how  
8 she funded my ticket.

9 Q. I appreciate the tip.

10 Do you have any information  
11 inside of your head about how  
12 Ghislaine financed your trip to South  
13 Africa?

14 MR. GUIRGUIS: Counsel, she  
15 has repeatedly stated that she  
16 does not know. You keep asking  
17 her the same question.

18 MS. MENNINGER: No, she has  
19 repeated to he me that she  
20 needed -- I needed to ask my  
21 client.

22 MR. GUIRGUIS: Hold on.

23 "QUESTION: Ghislaine funded  
24 your ticket?

25 "ANSWER: Well, she was his

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1 HIGHLY CONFIDENTIAL AEO

2 right-hand...

3 "QUESTION: When did  
4 Ghislaine finance this ticket?

5 "ANSWER: Well, it was  
6 through Jeffrey's company that  
7 she worked with."

8 Are you asking a different  
9 question, Counsel? Am I  
10 misunderstanding?

11 MS. MENNINGER: Yeah, you  
12 are.

13 MR. GUIRGUIS: Please.

14 MS. MENNINGER: Can you read  
15 the question that I asked.

16 (Requested portion of the  
17 record was read back.)

18 A. In my head, I can't remember  
19 how she financed, how she and Jeffrey  
20 financed.

21 Q. Did you see any invoice paid  
22 by Ghislaine for your ticket?

23 A. No. But a ticket was  
24 produced which enabled me to fly back  
25 to my family, so a ticket was produced

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1 HIGHLY CONFIDENTIAL AEO

2 by Ghislaine and Jeffrey in order for  
3 me to fly home to see my family.

4 Q. How did Ghislaine produce a  
5 ticket to you?

6 A. I can't remember.

7 Q. Did it come by email?

8 MR. GUIRGUIS: Objection.

9 A. I've provided all the emails  
10 that I have.

11 Q. That's not the question.

12 Did the ticket get produced  
13 to you by Ghislaine by email?

14 MR. GUIRGUIS: Objection.

15 A. No.

16 Q. Did it get sent by a courier  
17 to you from Ghislaine?

18 MR. GUIRGUIS: Objection.

19 A. I can't remember how I  
20 received the ticket specifically.

21 Q. Your final line to Pam is,  
22 "You must save some partying energy  
23 for me when I come back. Lots of  
24 love, Sarah."

25 Correct?

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2 A. Mm-hmm.

3 Q. Is that right?

4 A. Mm-hmm.

5 Q. In the first paragraph, do  
6 you advise Sarah, "Still very loved  
7 up, so much so that he asked me to  
8 move in with him and I accepted. All  
9 good," exclamation point, exclamation  
10 point, exclamation point -- well,  
11 about eight of them, or ten.

12 A. Mm-hmm.

13 Q. Is that what you wrote?

14 A. Yes, that's what you wrote.

15 Q. Is that true?

16 A. Yes.

17 Q. Looking back at Defendant's  
18 Exhibit 8, which you testified earlier  
19 were your communications with Nataly  
20 Malyshev, or some of them --

21 A. That's Exhibit 9.

22 MR. GUIRGUIS: We seem to be  
23 missing Exhibit 8 from the stack.

24 MS. MENNINGER: I checked it  
25 during the break.

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2 MR. GUIRGUIS: It's just out  
3 of order.

4 THE WITNESS: Is this  
5 Defendant's Exhibit 8?

6 MS. MENNINGER: Eight.

7 THE WITNESS: Is this  
8 Exhibit 8?

9 MR. GUIRGUIS: Yes, it is.

10 Q. So the emails with Malyshev.  
11 Maybe I wrote it down wrong. I  
12 apologize.

13 MR. GUIRGUIS: With who?  
14 I'm sorry?

15 MS. MENNINGER: Nataly --

16 THE WITNESS: That was  
17 Exhibit -- oh, gosh. This is  
18 Exhibit 9 between Natalya and  
19 myself.

20 Q. Okay. And it's got RANSOME  
21 0004 and 0005; is that right? Just  
22 making sure we're looking at the same  
23 thing. On the lower right-hand  
24 corner.

25 A. Yes, 000004.

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2 Q. All right. Those are emails  
3 that you and Nataly exchanged in  
4 February of 2007, correct?

5 A. That's correct.

6 Q. And can you read to us the  
7 email at the bottom from you to Nataly  
8 on February 8, 2007.

9 A. "Hey sweetie, how are you?  
10 I'm busy writing my essay for FIT.  
11 What fun. I had a bit of a fight with  
12 Jeffrey. Oh, well, what can you do.  
13 I meant to ask in my last email can  
14 you please email me your address. It  
15 looks like I'm not going to Miami  
16 either. Well, at least I will be back  
17 in NY. Hope you are well and look  
18 forward to seeing you soon. Please  
19 tell Jennifer I say hi. Lots of hugs  
20 and kisses, Sarah."

21 Q. Were you writing your FIT  
22 essay in February 2007 while you were  
23 in South Africa?

24 A. Yeah. It took me quite some  
25 time writing my essay, so it was over

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1 HIGHLY CONFIDENTIAL AEO

2 a duration of...

3 Q. Did you email your essay  
4 from South Africa to Ghislaine  
5 Maxwell?

6 A. I don't recall emailing her.

7 Q. Defendant's Exhibit 10, I  
8 think it is, with Lesley Groff?

9 A. Yes.

10 MR. GUIRGUIS: Hold on a  
11 second. Let me just find my  
12 copy.

13 Q. And I show RANSOME 006 is  
14 the first one in the lower right-hand  
15 corner.

16 A. Yes.

17 Q. So did you correspond with  
18 Lesley about faxing your FIT  
19 application in to her on or about  
20 February 8, 2007?

21 A. Yes.

22 Q. Did you also ask her to look  
23 into booking a flight for you back to  
24 New York?

25 A. That's correct.



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2 Q. Did you give her the date  
3 you wanted to fly back?

4 A. That's correct.

5 Q. And the next email down, did  
6 you say, "Hi, can you please phone  
7 back?"

8 A. Mm-hmm.

9 Q. Was that to Lesley or to  
10 Jeffrey?

11 A. I can't remember who it was  
12 to. Jeffrey never corresponded  
13 directly; he either did it through  
14 Lesley Groff or -- so I can't remember  
15 who phoned me back.

16 Q. Can you turn two pages back  
17 to where it says RANSOME\_0009.

18 Do you see those emails?

19 A. Mm-hmm.

20 MR. GUIRGUIS: Read the  
21 emails, don't just...

22 Q. Did Lesley ask what type of  
23 visa you were coming on, student or  
24 tourist?

25 MR. GUIRGUIS: Hold on,

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2 Counsel.

3 Are you through with it?

4 THE WITNESS: Sorry, I  
5 haven't finished reading yet.

6 Q. Did Lesley ask what type of  
7 visa you were coming on, student or  
8 tourist?

9 A. That's correct.

10 Q. And what was your response?

11 A. I can't remember what my  
12 response was.

13 Q. Is it visible in this  
14 exhibit?

15 A. No.

16 Q. All right. You said you  
17 left New York in late April --

18 A. That's correct.

19 Q. -- 2007?

20 Did you find any records  
21 reflecting that departure when you  
22 were going through all of your emails  
23 and your other documents?

24 A. No.

25 Q. When was the last time you

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2 saw Jeffrey Epstein?

3 A. April 2007.

4 Q. Where did you see him last?

5 A. In New York.

6 Q. Where in New York?

7 A. I can't remember where I  
8 last saw him.

9 Q. Do you remember what  
10 happened the last time you saw him?

11 A. No, I can't remember what  
12 happened.

13 Q. Do you know whether he gave  
14 you any money the last time you saw  
15 him?

16 A. No, he didn't give me money.

17 Q. Do you know if you talked  
18 about FIT the last time you saw him?

19 A. I didn't really want  
20 anything do with Jeffrey and Ghislaine  
21 at that stage. So at that point I did  
22 not talk about FIT anymore with them.  
23 I just wanted to go back home to my  
24 mom.

25 Q. And this is when you were

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1                   HIGHLY CONFIDENTIAL AEO

2       living with Adam?

3           A.       Yes.

4           Q.       When did you decide you  
5       didn't want to have anything to do  
6       with Jeffrey Epstein?

7           A.       After my trip to South  
8       Africa, my relationship deteriorated  
9       with Jeffrey and Ghislaine. So I  
10       didn't really want to be here anymore.

11          Q.       When did you make that  
12       decision?

13          A.       I was kind of toying with  
14       the idea of going back. I was in a  
15       bit of a mess after what I had been  
16       through with Ghislaine and Jeffrey,  
17       so -- yeah.

18          Q.       And who purchased your plane  
19       ticket to London?

20          A.       I think it was my mom. I  
21       can't remember.

22          Q.       Were you still taking the  
23       medications at the time you went back?

24          A.       Yes.

25          Q.       And you returned from South

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2 Africa in February 2007, correct?

3 A. That's correct.

4 Q. And that's when you made the  
5 decision to break with Jeffrey by  
6 moving in with Adam, correct?

7 A. I wanted to distance myself  
8 from Jeffrey. Things weren't great.  
9 What he was doing was wrong and what  
10 he was doing to me was wrong, and I  
11 got pretty depressed about it. I was  
12 in -- I was stuck in a dark hallway.  
13 I was basically being abused by a man,  
14 and I -- I didn't -- I didn't know  
15 what to do, where to go.

16 Q. Did you have a bank account  
17 in New York?

18 A. Yes, I did.

19 Q. With which bank?

20 MR. GUIRGUIS: Objection.

21 Same objection I gave at the  
22 beginning, financial information  
23 for a nonparty witness.

24 MS. MENNINGER: The name of  
25 the bank. The name of the bank.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Let me ask you this: What  
3 did you do with the cash you received  
4 from Jeffrey Epstein? Did you put it  
5 in the bank?

6           A.       No. I spent it on food,  
7 cabs. General expenses.

8           Q.       Where did you get the money  
9 that you put into the bank?

10          A.       From the occasional modeling  
11 job that I got, freelance modeling.

12          Q.       Were you still modeling in  
13 the spring of 2007?

14          A.       No.

15                   MR. GUIRGUIS: Off the  
16 record.

17                   (An off-the-record  
18 discussion was held.)

19                   MR. GUIRGUIS: Back on the  
20 record.

21                   MS. MENNINGER: I think if  
22 you can just give my co-counsel  
23 and I a minute off the record.

24                   (Time noted: 6:28 p.m.)

25                   (Recess.)

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2 (Time noted: 6:29 p.m.)

3 Q. In February of 2007, you  
4 decided to make a break with Jeffrey  
5 Epstein, correct?

6 A. No, I didn't decide to make  
7 a break with Jeffrey Epstein. He let  
8 me down with my FIT application and he  
9 wasn't taking me seriously, and he  
10 wasn't following through his end of  
11 the deal, basically.

12 Q. How did he let you down with  
13 your FIT application?

14 A. Because I didn't go to FIT.

15 Q. And why didn't you go to  
16 FIT?

17 A. Because I wanted to go home  
18 back to my mom.

19 Q. When did you decide that he  
20 let you down with the FIT application?

21 A. Well, I think it was pretty  
22 much after that incident with Alan and  
23 the fact that I had been sexually  
24 abused for months on end by Jeffrey, I  
25 kind of wanted to call it time with

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2 him.

3 I saw how he was acting with  
4 the other girls. I saw how they got  
5 pretty mentally messed up as well; for  
6 example, [REDACTED]. So...

7 Q. And you saw that before you  
8 went to South Africa?

9 A. Yes.

10 Q. And while you were in South  
11 Africa, you got in a fight with  
12 Jeffrey.

13 A. That's correct.

14 Q. And you didn't want to lose  
15 this weight, correct?

16 A. I didn't want to lose this  
17 weight because I would be dead if I  
18 weighed 52 kilograms.

19 Q. You didn't want to lose the  
20 weight in South Africa, correct?

21 A. I wanted to -- I was  
22 desperate to go to FIT. I tried to  
23 lose as much weight as I could for  
24 Jeffrey and Ghislaine.

25 Q. While you were in South



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1 HIGHLY CONFIDENTIAL AEO

2 Africa, you did some reevaluating of  
3 your life?

4 MR. GUIRGUIS: Objection.

5 A. Reevaluating of my life? I  
6 wouldn't say I spent the holiday  
7 reevaluating my life, no.

8 Q. Were you happy when you were  
9 in South Africa?

10 A. I was concerned because I  
11 was being asked and being hounded to  
12 find a 18-year-old PA for Jeffrey, and  
13 I knew that was wrong because he would  
14 do exactly the same thing to that girl  
15 that he did to me, and I would not let  
16 him do that to another girl.

17 Q. So when you were in South  
18 Africa, you decided to make a break  
19 from Jeffrey.

20 MR. GUIRGUIS: Objection.

21 A. I didn't decide to make a  
22 break; I decided to distance myself  
23 from Jeffrey. Not make a break, but  
24 to distance myself.

25 Q. When you came back, you

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2 moved in with Adam?

3 A. That's correct.

4 Q. You can't remember the last  
5 time that you saw Jeffrey?

6 MR. GUIRGUIS: Objection.

7 That's not the testimony.

8 A. No.

9 MS. MENNINGER: No further  
10 questions. Thank you.

11 THE WITNESS: Thank you.

12 MS. MENNINGER: Do you have  
13 any?

14 MR. GUIRGUIS: Give me one  
15 second to confer.

16 We have no questions.

17 MS. MENNINGER: Counsel,  
18 we're going to, unfortunately,  
19 before we go off the record, need  
20 to leave the deposition open,  
21 just because there are some email  
22 documents that were referenced  
23 but not produced. And we can  
24 follow up and have a discussion  
25 with counsel about that.

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2 MR. GUIRGUIS: Okay. So on  
3 the record -- we can carry on the  
4 conversation, certainly, off the  
5 record.

6 But while we're on the  
7 record, I will say that my  
8 understanding is that those  
9 documents were all produced to  
10 you, including all the emails  
11 that you asked her about, and  
12 where are the missing emails, and  
13 she kept saying they'd been  
14 produced to her attorneys. My  
15 understanding is that the  
16 attorneys did provide them to  
17 defense counsel.

18 MS. MENNINGER: Well,  
19 there's a current passport that  
20 we know was not produced, there  
21 is an FIT application that we  
22 know was not produced, and I  
23 believe there are emails that  
24 were not produced.

25 And I'm happy to have the

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1                   HIGHLY CONFIDENTIAL AEO  
2                   conversation continue off the  
3                   record, but I'm telling you those  
4                   are some of my recollections.

5                   MR. GUIRGUIS: Okay. And to  
6                   be clear so that I'm not  
7                   misrepresenting, I see that I  
8                   said there were documents and the  
9                   emails. I meant to clarify, as  
10                  in the emails I know were  
11                  produced.

12                  I can't speak to any other  
13                  documents that you might want to  
14                  raise a dispute about. But with  
15                  respect to the emails that you  
16                  said, my understanding, at least  
17                  as I sit here, is that they were  
18                  produced.

19                  That said, I think we can go  
20                  off the record and resolve any  
21                  other issues between counsel and  
22                  I.

23                  (Time noted: 6:34 p.m.)

24  
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HIGHLY CONFIDENTIAL AEO

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SARAH RANSOME

Signed and subscribed to  
before me, this \_\_\_\_\_ day  
of \_\_\_\_\_ 2017.

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Notary Public

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C E R T I F I C A T E

STATE OF NEW YORK )  
:  
COUNTY OF NEW YORK)

I, Jeremy Richman, a Notary Public within and for the State of New York, do hereby certify:

THAT SARAH RANSOME, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of February 2017.



  
-----  
Jeremy Richman

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2	INDEX	
3	EXAMINATION BY	
4	MS. MENNINGER	7
5	P.M. Session	199
6		
7	EXHIBITS MARKED	
8	(Defendant's Exhibit 1, hand-drawn	128
9	picture marked for identification.)	
10	(Defendant's Exhibit 2, hand-drawn	149
11	picture, was marked for	
12	identification.)	
13	(Defendant's Exhibit 3, affidavit,	262
14	was marked for identification.)	
15	(Defendant's Exhibit 4,	274
16	RANSOME_000168, was marked for	
17	identification.)	
18	(Defendant's Exhibit 5, jury trial	323
19	demand, was marked for	
20	identification.)	
21	(Defendant's Exhibit 6, Bates	335
22	stamped Ransome_000017, was marked	
23	for identification.)	
24	(Defendant's Exhibit 7, Bates	339
25	stamped Ransome_000204, was marked	

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1	for identification.)	
2	(Defendant's Exhibit 8, Notice of	363
3	Service of Rule 45 Subpoena and	
4	Notice of Deposition of Sarah	
5	Ransome, was marked for	
6	identification.)	
7	(Defendant's Exhibit 8, Bates	377
8	stamped RANSOME_000004, was marked	
9	for identification.)	
10	(Defendant's Exhibit 10, Bates	384
11	stamped RANSOME_000006, was marked	
12	for identification.)	
13	(Defendant's Exhibit 11, Maureen	386
14	Callahan article, was marked for	
15	identification.)	
16	(Defendant's Exhibit 12, website	389
17	printout titled How to Apply, was	
18	marked for identification.)	
19	(Defendant's Exhibit 13, Bates	393
20	stamped RANSOME_000007 was marked	
21	for identification.)	
22		
23	QUESTIONS INSTRUCTED NOT TO ANSWER	
24	do you have any source of income?	10
25	so I'm going to ask you a last	12



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1	time: Do you have any source of	
2	income?	
3	what is your partner's occupation?	13
4	and where do your parents live?	14
5	Ms. Ransome, there was a question	15
6	pending when you took a break with	
7	your lawyers. Can you please	
8	answer the question.	
9	what is your partner's cell phone	28
10	number?	
11	and you're staying where while	31
12	you're here?	
13	have you been promised that you	34
14	would have counsel to help you	
15	bring a lawsuit against a number of	
16	people?	
17	what's the private legal matter?	172
18	what did you talk about with Alan	184
19	Dershowitz?	
20	did you sign a common interest	185
21	agreement with Jeffrey?	
22	did he do anything in terms of	199
23	contacting anyone on your behalf?	
24	what was the specific legal matter	199
25	that you were seeking	

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1 representation for?

2 who prescribed it to you? 204

3 so please tell me how to reach your 241

4 stepmother, Linda Ransome.

5 when did you see that? 284

6 when did you provide them to your 363

7 counsel?

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