

COMPOSITE
EXHIBIT 3
(File Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----X
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

June 21, 2016

9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RECAREY, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Ghislane Maxwell?

3 A. I wanted to speak with everyone related to
4 this home, including Ms. Maxwell. My contact was
5 through Gus, Attorney Gus Fronstin, at the time, who
6 initially had told me that he would make everyone
7 available for an interview. And subsequent
8 conversations later, no one was available for
9 interview and everybody had an attorney, and I was
10 not going to be able to speak with them.

11 Q. Okay. During your investigation, what did
12 you learn in terms of Ghislane Maxwell's
13 involvement, if any?

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

16 THE WITNESS: Ms. Maxwell, during her
17 research, was found to be Epstein's long-time
18 friend. During the interviews, Ms. Maxwell was
19 involved in seeking girls to perform massages
20 and work at Epstein's home.

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

23 BY MR. EDWARDS:

24 Q. Did you interview -- how many girls did
25 you interview that were sought to give or that

1 JOSEPH RECAREY - CONFIDENTIAL

2 I guess I'll start with where it says on 4/4/2005, I
3 just want to ask you, was a voice mail message taken
4 into evidence from HR to SG?

5 A. Yes.

6 Q. Okay. And the purpose of that evidence is
7 to corroborate what?

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

10 THE WITNESS: It was actually a phone call
11 from HR to SG confirming an appointment to go
12 work at Epstein's residence.

13 BY MR. EDWARDS:

14 Q. The next line down is what I wanted to
15 focus on, April 5th, 2005.

16 This trash pull, what evidence is yielded
17 from this particular trash pull?

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

20 THE WITNESS: The trash pull indicated
21 that there were several messages with written
22 items on it. There was a message from HR
23 indicating that there would be an 11:00
24 appointment. There were other individuals that
25 had called during that day.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. And when you would -- when you would see
4 females' names and telephone numbers, would you take
5 those telephone numbers and match it to -- to a
6 person?

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

9 THE WITNESS: We would do our best to
10 identify who that person was.

11 BY MR. EDWARDS:

12 Q. And is that one way in which you
13 discovered the identities of some of the other what
14 soon came to be known as victims?

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

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

19 Q. Okay. There's the second paragraph from
20 the bottom, it starts, "Detective Leigh provided
21 trash from 4/06, 4/07/2005."

22 Do you see that?

23 A. Yes.

24 Q. And what is the purpose of the indication
25 that "the following information was retrieved: Jet

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. Okay. Also reflected are the property
4 receipts?

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

7 THE WITNESS: Correct.

8 BY MR. EDWARDS:

9 Q. All right.

10 And where were those taken from, in terms
11 of whose property is that?

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

14 THE WITNESS: This would have been taken
15 from the home of Jeffrey Epstein.

16 BY MR. EDWARDS:

17 Q. And in reviewing that evidence, were you
18 able to substantiate or corroborate certain victims'
19 accounts of their allegations of having been at the
20 house?

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

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. Did you find names of other witnesses and

1 JOSEPH RECAREY - CONFIDENTIAL

2 people that you knew to have been associated with
3 the house in those message pads?

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

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. And so what was the evidentiary value to
9 you of the message pads collected from Jeffrey
10 Epstein's home in the search warrant?

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

13 THE WITNESS: It was very important to
14 corroborate what the victims had already told
15 me as to calling in and for work.

16 BY MR. EDWARDS:

17 Q. Okay. And did you learn the identities of
18 some of the other individuals associated with
19 Jeffrey Epstein through the review of that
20 particular evidence?

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

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. Okay. And what did you do with that

AFFIDAVIT

STATE OF FLORIDA)
COUNTY OF)

I, _____, being first
duly sworn, do hereby acknowledge that I did
read a true and certified copy of my deposition
which was taken in the case of GIUFFRE V.
MAXWELL, taken on the 24th day of September,
2016, and the corrections I desire to make are
as indicated on the attached Errata Sheet.

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF)

Before me personally appeared

_____,
to me well known / known to me to be the
person described in and who executed the
foregoing instrument and acknowledged to and
before me that he executed the said instrument
in the capacity and for the purpose therein
expressed.

Witness my hand and official seal, this
_____ day of _____, _____.

(Notary Public)

My Commission Expires: