

## **EXHIBIT D**

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***VIRGINIA GIUFFRE***

*05/03/2016*

---

***Agren Blando Court Reporting & Video, Inc.***  
*216 16th Street, Suite 600*  
*Denver Colorado, 80202*  
*303-296-0017*

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

---

CONFIDENTIAL VIDEOTAPED DEPOSITION OF  
VIRGINIA GIUFFRE

May 3, 2016

---

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

---

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &  
LEHRMAN, P.L.

By Brad Edwards, Esq.  
425 N. Andrews Avenue  
Suite 2  
Fort Lauderdale, FL 33301  
Phone: 954.524.2820  
brad@pathtojustice.com  
Appearing on behalf of the  
Plaintiff

BOIES, SCHILLER & FLEXNER LLP

By Sigrid S. McCawley, Esq. (For Portion)  
401 East Las Olas Boulevard  
Suite 1200  
Fort Lauderdale, FL 33301-2211  
Phone: 954.356.0011  
smccawley@bsfllp.com  
Appearing on behalf of the  
Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.  
3 By Laura A. Menninger, Esq.  
Jeffrey S. Pagliuca, Esq.  
4 150 East 10th Avenue  
Denver, CO 80203  
Phone: 303.831.7364  
5 lmenninger@hmflaw.com  
jpagliuca@hmflaw.com  
6 Appearng on behalf of the  
Defendant

7 Also Present:

8 Brenda Rodriguez, Paralegal  
Nicholas F. Borgia, CLVS Videographer

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Pursuant to Notice and the Federal Rules  
of Civil Procedure, the VIDEOTAPED DEPOSITION OF  
VIRGINIA GIUFFRE, called by Defendant, was taken on  
Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150  
East 10th Avenue, Denver, Colorado, before Kelly A.  
Mackereth, Certified Shorthand Reporter, Registered  
Professional Reporter, Certified Realtime Reporter  
and Notary Public within Colorado.

\* \* \* \* \*

I N D E X

	EXAMINATION	PAGE
11		
12	MS. MENNINGER	8
13		
14	PRODUCTION REQUEST(S) :	
15	(None.)	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 wanted to know about the Prince Andrew incident.

2 Q So that's a different piece of paper?

3 A Yeah, that's just random paper.

4 Q So you had a green spiral notebook that  
5 you began sometime in 2011 or 2012 in which you wrote  
6 down your recollections about what had happened to  
7 you, and you burned that in a bonfire in 2013.

8 Did I get that right?

9 A You got that right.

10 Q And do you have no other names of people  
11 to whom you claim Ghislaine Maxwell directed you to  
12 have sex, correct?

13 A At this time, no.

14 Q Is there any document that would refresh  
15 your recollection that you could look at?

16 A If you have a document you'd like to show  
17 me, I would be glad to look at it and tell you the  
18 names I recognize off of that.

19 Q I'm just asking you if there's a document  
20 you know of that has this list of names in it?

21 A Not in front of me, no.

22 Q Where is the original of the photograph  
23 that has been widely circulated in the press of you  
24 with Prince Andrew?

25 A I probably still have it. It's not in my

1 possession right now.

2 Q Where is it?

3 A Probably in some storage boxes.

4 Q Where?

5 A In Sydney.

6 Q Where in Sydney?

7 A At some family's house. We got the boxes  
8 shipped to Australia, and they were picked up off the  
9 porch by my nephews and brought to their house.

10 Q Which is where?

11 A In Sydney.

12 Q Where in Sydney?

13 A Bass Hill.

14 Q And who lives in that house?

15 A Well, it's owned by my mother-in-law and  
16 father-in-law, but my nephews live in the house.

17 Q What are their names?

18 A I'm not giving you the names of my  
19 nephews.

20 Q What's the address of the house?

21 A Why would you want that?

22 Q I want to know where the photograph is.  
23 I'm asking you where the photograph is. And you've  
24 just told me it's somewhere in Bass Hill?

25 A Yes.

1 Q So where in Bass Hill is the photograph  
2 located?

3 A If I can't 100 percent say that the  
4 photograph is there, it could be at my house that I  
5 presently live in. I'm not going to give you the  
6 address of my nephews' residence.

7 Q When is the last time you saw the  
8 photograph in person?

9 A When I packed and left America.

10 Q Colorado?

11 A Yes.

12 Q All right. So you had that photograph  
13 here with you in Colorado?

14 A Yes.

15 Q What's on the back of the photograph?

16 A I'm sorry?

17 Q Is there anything on the back of the  
18 photograph?

19 A There's like the date it was printed, but  
20 no writing or anything.

21 Q Okay. Does it say where it was printed?

22 A I don't believe so. I think it just -- I  
23 don't remember. I just remember there's a date on  
24 it.

25 Q Whose camera was it taken with?

1 A My little yellow Kodak camera.

2 Q Who took the picture?

3 A Jeffrey Epstein.

4 Q And where did you have it developed?

5 A I believe when I got back to America.

6 Q So where?

7 A I don't know.

8 Q Palm Beach?

9 A I don't know.

10 Q What is the date the photograph was  
11 printed?

12 A I believe it's in March 2001.

13 Q Okay.

14 A But that's just off of my photographic  
15 memory. I don't -- it could be different, but I  
16 think it's March 2001.

17 Q You have a photographic memory?

18 A I'm not saying I have a photographic  
19 memory. But if I'd look at the back of the photo and  
20 I remember what it says, I believe it was March 2001.

21 Q Did the photograph ever leave your  
22 possession for a while?

23 A I gave it to the FBI.

24 Q Okay. And when did you get it back?

25 A When they took copies of it.

1 Q When was that?

2 A 2011.

3 Q When they came to interview you?

4 A Yes.

5 Q So from 2011 until you left Colorado it  
6 was in your personal possession?

7 A Yes.

8 Q What other documents related to this case  
9 are in that, storage boxes in Australia?

10 MR. EDWARDS: Object to the form.

11 A Documents related to this case -- there --  
12 I don't know. I really can't tell you. I mean,  
13 there's seven boxes full of Nerf guns, my kids' toys,  
14 photos. I don't know what other documents would be  
15 in there.

16 Q (BY MS. MENNINGER) Did anyone search  
17 those documents after you received discovery requests  
18 from us in this case?

19 A I haven't been able to obtain those boxes.  
20 I can't get them sent back up to me. It's going to  
21 cost me a large amount of money. And right now I'm  
22 trying to look after my family, so I'm not able to  
23 afford to get them up.

24 Q You live in Australia, correct?

25 A I do.

1 Q Okay. How far away are the boxes from  
2 where you live in Australia?

3 A Sydney is down here at the bottom. Cairns  
4 is up here at the top.

5 Q Okay.

6 A It's probably a six-day drive.

7 Q Did you fly here through Sydney?

8 A No.

9 Q Have you been to Sydney since you've moved  
10 back to Australia?

11 A I flew into Sydney with my three kids, but  
12 it was a connecting flight to Brisbane.

13 Q Did you ask your nephews or anyone else to  
14 search those boxes in response to discovery requests  
15 that we issued in this case?

16 A They are my nephews. I would never let  
17 them look at those.

18 Q Other than your green spiral notebook,  
19 what else did you burn in this bonfire in 2013?

20 A That was it.

21 Q That's the only thing?

22 A Yes.

23 Q Did you use wood?

24 A Yes.

25 Q Charcoal?

1 A My husband built the bonfire out of wood  
2 and I don't know what else he put in it. He's the  
3 one who always makes the fires, not me.

4 Q Who else was present?

5 A Just him and I.

6 Q Were your kids there?

7 A No. They were inside sleeping.

8 Q And what beach was this?

9 A It wasn't a beach. It was in my backyard.

10 Q What's your address?

11 A At that time?

12 Q Um-hum.

13 A [REDACTED]

14 Q [REDACTED]

15 A Yes.

16 Q Who were your neighbors?

17 A Sweet people. Ray and -- I could look on  
18 my phone if you want.

19 Q No, thank you. Do they still live there?

20 A Yes.

21 Q Do you keep in touch with them?

22 A Last time I talked to them was a few  
23 months ago.

24 Q Did they see the fire?

25 A They've seen many fires that we've had.

1 We've had lots of bonfires there.

2 Q Did you ever ride in a helicopter with  
3 Ghislaine Maxwell acting as pilot of the helicopter?

4 A Yes.

5 Q Who else was on the flight?

6 A I've been on the helicopter with her  
7 plenty of times. I can't mention how many people  
8 were on the -- on the helicopter at the same time.

9 Q How many times?

10 A I don't know. Do you have helicopter  
11 records that you could show me?

12 Q I'm asking you how many times you were on  
13 the helicopter with Ghislaine Maxwell acting as the  
14 pilot --

15 A It's impossible for me to answer the  
16 question without having the actual physical records  
17 in front of me.

18 Q I'm asking you to look into your memory  
19 and tell me how many times you recall being on a  
20 helicopter with Ghislaine Maxwell at the pilot seat?

21 A There is no number I can give you.  
22 There's plenty of times I've been on her helicopter.

23 Q Where did you go from and to on a  
24 helicopter?

25 A I believe it was -- don't quote me on this

1 because I get confused on the islands there. I want  
2 to say it was St. John's. It could have been  
3 St. Barts. St. John or St. Barts, and then we would  
4 fly straight to Jeffrey's island.

5 Q Okay. Did you ever go anywhere else on  
6 the helicopter?

7 A No.

8 Q Were you ever on the helicopter with Bill  
9 Clinton and Ghislaine Maxwell as the pilot of the  
10 helicopter?

11 A No.

12 Q Were you ever on the helicopter with Bill  
13 Clinton's Secret Service and Ghislaine Maxwell as the  
14 pilot?

15 A No.

16 Q Do you recall telling Sharon Churcher that  
17 you were?

18 A No.

19 Q Did you see the press article in which  
20 Sharon Churcher reported that you were?

21 MR. EDWARDS: Objection. I'd just ask  
22 that if you're going to ask this witness about a  
23 specific article I'd like for her to see the article.  
24 Otherwise she's not going to testify about it.

25 If you have something to show her, then,

1 please.

2 Q (BY MS. MENNINGER) Do you recall seeing a  
3 press article in which Sharon Churcher reported that  
4 you were on a helicopter with Bill Clinton and  
5 Ghislaine Maxwell as the pilot?

6 MR. EDWARDS: Again, I'll let you answer  
7 the question once she's looking at the document that  
8 you're being asked about.

9 MS. MENNINGER: You're not letting her  
10 answer a question about whether she recalls a  
11 particular press statement?

12 MR. EDWARDS: I will let her answer every  
13 question about the press statement as long as she  
14 sees the press statement. I'm okay with that. She  
15 can answer all of them.

16 MS. MENNINGER: No, there is a rule of  
17 civil procedure that allows you to direct a witness  
18 not to answer a question when there's a claim of  
19 privilege.

20 What privilege are you claiming to direct  
21 her not to answer this question?

22 MR. EDWARDS: I thought that you wanted  
23 accurate answers from this witness. If the --

24 MS. MENNINGER: I asked her if she  
25 recalled something --

1                   MR. EDWARDS: If the sole purpose is to  
2 just to harass her --

3                   MS. MENNINGER: I asked her if she  
4 recalled something --

5                   MR. EDWARDS: Then that's just not going  
6 to be what's happening today.

7                   Q         (BY MS. MENNINGER) All right. So you're  
8 refusing to answer a question about whether you  
9 recall a particular press statement --

10                  MR. EDWARDS: She's --

11                  Q         (BY MS. MENNINGER) -- is that true?

12                  MR. EDWARDS: She is not refusing to  
13 answer any questions. She --

14                  A         I'm not refusing to answer. I just want  
15 to see the article you're talking about so I can be  
16 clear in my statement.

17                  Q         (BY MS. MENNINGER) Do you recall seeing a  
18 press article written by Sharon Churcher reporting  
19 that you flew on a helicopter with Bill Clinton and  
20 Ghislaine Maxwell as the pilot?

21                  A         No, I do not recall reading a press  
22 article saying that I was on a helicopter with Bill  
23 Clinton as Ghislaine is the pilot.

24                  Q         Do you recall telling Sharon Churcher that  
25 you had conversations with Bill Clinton regarding him

1 flying on a helicopter with Ghislaine Maxwell?

2 A I believe that it was taken out of  
3 context. Ghislaine told me that she flew Bill  
4 Clinton in. And Ghislaine likes to talk a lot of  
5 stuff that sounds fantastical. And whether it's true  
6 or not, that is what I do recall telling Sharon  
7 Churcher.

8 Q So you told Sharon Churcher that Ghislaine  
9 Maxwell is the one who told you that she flew Bill  
10 Clinton in the helicopter?

11 A I told Sharon Churcher that Ghislaine flew  
12 Bill Clinton onto the island, based upon what  
13 Ghislaine had told me.

14 Q Not based upon what Bill Clinton had told  
15 you, correct?

16 A Correct.

17 Q Did you ever ask Sharon Churcher to  
18 correct anything that was printed under her name,  
19 concerning your stories to Sharon Churcher?

20 A I wasn't given those stories to read  
21 before they were printed.

22 Q After they were printed did you read them?

23 A I tried to stay away from them. They were  
24 very hard. You have to understand it was a very hard  
25 time for me and my husband to have to have this

1           public -- we didn't think it was going to be this  
2           publicly announced and that big. So we turned off  
3           the news and we stopped reading so many things.

4           Q        You didn't read the articles about your  
5           stories to Sharon Churcher --

6           A        I've read some articles --

7           Q        Let me just finish. You did not read the  
8           articles published by Sharon Churcher about your  
9           stories to Sharon Churcher?

10          A        I have read some articles about what  
11           Sharon Churcher wrote. And a lot of the stuff that  
12           she writes she takes things from my own mouth and  
13           changes them into her own words as journalists do.

14                   And I never came back to her and told her  
15           to correct anything. What was done was done. There  
16           was nothing else I can do.

17          Q        So even if she printed something that were  
18           untrue you didn't ask her to correct it, correct?

19          A        There was things that she printed that  
20           really pissed me off, but there was nothing I could  
21           do about it. It's already out there.

22          Q        She printed things that were untrue,  
23           correct?

24                   MR. EDWARDS: Objection to the form.  
25                   Mischaracterization.

1           A       I wouldn't say that they were untrue. I  
2       would just say that she printed them as journalists  
3       take your words and turn them into something else.

4           Q       (BY MS. MENNINGER) She got it wrong?

5                   MR. EDWARDS: Object to the form.  
6       Mischaracterization.

7           A       In some ways, yes.

8           Q       (BY MS. MENNINGER) Did she print things  
9       in her articles that you did not say to her?

10                  MR. EDWARDS: I object and ask that the  
11       witness be given the opportunity to see the document  
12       so that she can review it and answer that question  
13       accurately. Otherwise she's unable to answer the  
14       question. I'm not going to allow her to answer.

15                  MS. MENNINGER: You know the civil rules  
16       tell you not to suggest answers to your client.

17           Q       (BY MS. MENNINGER) And you understand  
18       your lawyer is now directing you to not all of a  
19       sudden remember what your answer is. That's what  
20       he's suggesting that you say. So you're not supposed  
21       to listen to him suggest that to you. You're  
22       supposed to tell me from your memory.

23                  MR. EDWARDS: That is not what I'm --

24           Q       (BY MS. MENNINGER) Did you --

25                  MR. EDWARDS: That's not what I'm doing.

1                    You don't get to just talk over me and  
2 tell my client when not to listen to me. All you  
3 have to do to get answers is show her the document  
4 you're talking about, and I'll let her answer every  
5 question. I don't know why we're so scared of the  
6 actual documents.

7                    MS. MENNINGER: I don't know why you're  
8 scared of your client's recollection, Mr. Edwards.  
9 But anyway --

10                  MR. EDWARDS: Why would you do this to  
11 her?

12                  Q         (BY MS. MENNINGER) Did Sharon Churcher  
13 print things that you did not say?

14                  MR. EDWARDS: I'm going to instruct my  
15 client not to answer unless you give her what it is  
16 that you're talking about that was printed. And she  
17 will tell you the answer, the accurate answer to your  
18 question. Just without the document to refresh her  
19 recollection and see it, she's not going to answer  
20 the question.

21                  Q         (BY MS. MENNINGER) Did Sharon Churcher  
22 print things that you did not say?

23                  MR. EDWARDS: Same objection. Same  
24 instruction not to answer.

25                  I think I've made a very clear record as

1 to why I want my client to answer all of these  
2 questions, but I want her to have the fair  
3 opportunity to see this document.

4 Q (BY MS. MENNINGER) Did Sharon Churcher  
5 print things that you felt were inaccurate?

6 MR. EDWARDS: Same objection. Same  
7 instruction. If she sees the document, she's going  
8 to answer every one of these questions.

9 Q (BY MS. MENNINGER) Did any other reporter  
10 print statements that you believe are inaccurate?

11 MR. EDWARDS: Same objection. Same  
12 instruction.

13 Q (BY MS. MENNINGER) Did any reporter print  
14 statements about Ghislaine Maxwell that were  
15 inaccurate?

16 MR. EDWARDS: Same objection. Same  
17 instruction.

18 This is harassing. This is harassing a  
19 sexual abuse victim. And all I'm asking is for  
20 fairness, that we just let her see the document so  
21 she can answer this.

22 MS. MENNINGER: Mr. Edwards, please stop  
23 saying anything other than an objection, what the  
24 basis is, or instructing your client not to answer.

25 MR. EDWARDS: I will do that.

1 MS. MENNINGER: That's what the Federal  
2 Rules of Civil Procedure provide.

3 MR. EDWARDS: I hear you. They also  
4 provide for fairness and civility. And all I'm  
5 asking, very calmly, is for her to see this.

6 MS. MENNINGER: Mr. Edwards, this is not  
7 your deposition. I'm asking your client what she  
8 remembers. If she doesn't want to talk about what  
9 she remembers, then let her not answer. But you  
10 cannot instruct her not to answer unless there's a  
11 privilege.

12 What privilege --

13 MR. EDWARDS: I am instructing her not to  
14 answer.

15 Q (BY MS. MENNINGER) All right. You are  
16 refusing to answer questions about whether statements  
17 to the press about Ghislaine Maxwell attributed to  
18 you were inaccurate?

19 MR. EDWARDS: She's not refusing not to  
20 answer.

21 A You are refusing to show me these  
22 documents so I could answer properly. I would give  
23 you an answer if you were to show me some documents.

24 Q (BY MS. MENNINGER) You can't say without  
25 looking at a document whether the press attributed to

1 you is accurate or inaccurate?

2 A Please show me the document.

3 Q You can't say from the top of your head  
4 whether any inaccurate statement has been attributed  
5 to you in the press?

6 A Please show me a document and I will tell  
7 you.

8 Q Are you refusing to answer my questions  
9 about your knowledge of whether inaccurate statements  
10 have been attributed to you in the press?

11 A Are you refusing to give me the documents  
12 to look at?

13 Q Are you refusing to answer the question?  
14 A I am refusing to answer the question based  
15 upon the fact that you are not being fair enough to  
16 let me see the document in order to give you an  
17 honest answer.

18 Q Ms. Giuffre --

19 A Yes.

20 Q -- we are talking about press that has  
21 been published on the Internet, correct?

22 A Yes.

23 Q Do you have access to the Internet?

24 A Yes.

25 Q Have you looked on the Internet and read

1           articles that attribute statements to you about  
2           Ghislaine Maxwell?

3           A       Yes.

4           Q       Do you know any statement that has been  
5           attributed to you in a press article on the Internet  
6           about Ghislaine Maxwell that is untrue?

7                   MR. EDWARDS: Same objection. Same  
8                   instruction.

9           A       Please show me a specific document.

10          Q       (BY MS. MENNINGER) Do you know of any  
11           such statement about Ghislaine Maxwell attributed to  
12           you by the press that is inaccurate?

13          A       If you could please show me a specific  
14           document.

15          Q       Tell me what Sharon Churcher asked you to  
16           write for her.

17          A       Any knowledge that I had about my time  
18           with Prince Andrew.

19          Q       And did you write it?

20          A       Um-hum.

21          Q       What did you write it in or on?

22          A       Paper.

23          Q       What kind of paper?

24          A       Lined paper.

25          Q       Was it in a book or single sheets?

1 A Single sheets.

2 Q And did you write a long document or a  
3 short document? What was it?

4 A I can't recall how long the document was,  
5 but I would say it would be a few pages.

6 Q And other than asking you to write  
7 whatever you remember about Prince Andrew, did she  
8 give you any other directions about what you should  
9 write?

10 A She was interested in two things, really.  
11 How Epstein got away with so many counts of child  
12 trafficking for sex and how Prince Andrew was  
13 involved in it. Those were her two main inquiries.

14 Q What did she ask you to write?

15 A She asked me to write about Prince Andrew.

16 Q Did she tell you to put it in your own  
17 handwriting?

18 A No, she just asked me to write down what I  
19 can remember.

20 Q Did you give her everything that you  
21 wrote?

22 A Did I give her the whole entire pages that  
23 I wrote?

24 Q Yes.

25 A Yeah, I wrote pages for her specifically.

1 Q In your own handwriting?

2 A In my own handwriting.

3 Q And what you wrote, was that true?

4 A Yes.

5 Q And did you get paid for those pieces of  
6 paper?

7 A Not for the papers, I don't believe.

8 Q Okay. Have you gotten paid when they've  
9 been reprinted?

10 A No.

11 Q Have you negotiated any deal with Radar  
12 Online?

13 A No.

14 Q Have you negotiated any deal with Sharon  
15 Churcher for the purpose of publishing those pieces  
16 of paper?

17 A Not those pieces of paper.

18 Q When did you write those pieces of paper?

19 MR. EDWARDS: Object to the form.

20 A A week before she came out.

21 Q (BY MS. MENNINGER) And when did you give  
22 them to her?

23 A When she came out.

24 Q When was that?

25 A Sometime, I believe, in early 2011.

1 Q What did you get paid for, if not for  
2 those pieces of paper?

3 MR. EDWARDS: Object to the form.

4 A I was paid for the picture with Prince  
5 Andrew with his arm around me, Ghislaine in the  
6 background. And I was paid for the, I guess, the  
7 print of the stories.

8 Q (BY MS. MENNINGER) Anything else?

9 A No.

10 Q You were not paid for those pieces of  
11 paper?

12 A No.

13 Q All right. And how many pieces of paper  
14 did you write?

15 A Like I said, I'm rounding it around three.

16 Q Three pieces of paper?

17 A That's what I -- I don't remember to be  
18 exact on a number. I'm sorry. But over three pages.

19 Q And you wrote those sometime in 2011?

20 A The week that she was coming out to see  
21 me.

22 Q And you gave them to her, right?

23 A I gave them to her.

24 Q Did you keep a copy of that?

25 A No.