

# COMPOSITE EXHIBIT A

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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23  
24  
25

## Questions About People Under the Age of 18 at Epstein's Home

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.

Questions About Meeting the Plaintiff and  
Massages with Plaintiff

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?

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



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

## Questions About Messages with Minors

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 --

## Questions About Hiring Massage Therapists

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.

Questions About



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]

[REDACTED]  
[REDACTED] [REDACTED]  
18 may have been in the house when Jeffrey was  
19 in the house. I have no idea how old she  
20 was.

21 Q. I understand she was with [REDACTED]

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

25 A. I have no idea.

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]



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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]

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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 [REDACTED]

21 A. I do.

22 Q. How did you meet [REDACTED]

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 Jeffrey arrange for a visa for  
3 [REDACTED]?

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

6 Q. Was [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED]

23 A. No.

24 Q. [REDACTED]

25 A. I have no idea.

## Questions About Mr. Epstein and Sex

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.

Questions About [REDACTED], Plaintiff, [REDACTED]  
[REDACTED] and Sex

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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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 [REDACTED]

19 A. I am.

20 Q. Has [REDACTED] given a statement  
21 to police about you performing sexual acts on  
22 her?

23 A. I have not heard that.

24 Q. Has [REDACTED] given a statement  
25 to police about Jeffrey Epstein performing



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2 asked and answered already.

3 Q. You can answer the question.

4 A. I have no idea what [REDACTED]

5 did.

6 Q. You never observed [REDACTED]  
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 [REDACTED]

13 A. I do.

14 Q. What is your relationship with

15 [REDACTED]

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 [REDACTED]

22 Q. Is [REDACTED] one of your friends?

23 A. Yes.

24 Q. Did you ever send Virginia to

25 [REDACTED] to give him a

1 G Maxwell - Confidential

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 [REDACTED]

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 [REDACTED] 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,

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 [REDACTED], when  
8 did you first meet [REDACTED]

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

10 Q. Did you hire [REDACTED]

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 [REDACTED]

22 A. I don't recall the exact interview,  
23 no.

24 Q. Do you know what tasks [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] to  
17 massage [REDACTED]

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

20 Q. Did you ever have sexual contact  
21 with [REDACTED]

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.

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 [REDACTED]

7 A. Again, she is an adult --

8 Q. I'm asking you, did you ever have  
9 sexual contact with [REDACTED]

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 [REDACTED] that was not consensual on  
16 [REDACTED] part?

17 MR. PAGLIUCA: You can answer  
18 nonconsensual.

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

21 Q. Not [REDACTED]

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.

1 G Maxwell - Confidential

2 Q. So if [REDACTED] 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 [REDACTED]  
10 [REDACTED]

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

13 A. I've, again, read that [REDACTED]  
14 claimed that she met or that she said she met  
15 [REDACTED] 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 [REDACTED]

19 A. I do.

20 Q. How do you know her?

21 A. [REDACTED]

22 Q. So she worked for you?

23 A. Yes.

24 Q. Did you hire her?

25 A. Again, Jeffrey hired people.

Questions About [REDACTED] Virginia, and Ms. Maxwell Regarding  
Sex



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 [REDACTED] 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 [REDACTED] 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.

## Questions About Outfits and Sex Toys

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

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.

## Questions About Plaintiff and Epstein and Sex

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

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?

## Questions About Training Plaintiff to Recruit Girls for Massages



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.

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

## Questions About Ms. Maxwell's Relationship with Mr. Epstein

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.

Questions About Recruiting Girls, an Underage Girl in London,  
and Foreign Girls

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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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 [REDACTED] 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.

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 [REDACTED]  
16 for the purposes of providing massages?

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

19 A. I am not aware of [REDACTED] 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.

Questions About Underage Girls, Sex with [REDACTED], and  
Outfits

1 G Maxwell - Confidential

2 Q. Were you present on the island when  
3 [REDACTED] 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 [REDACTED]

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 [REDACTED]

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 [REDACTED]

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.

## Questions About Pictures of Naked Girls

1 G Maxwell - Confidential

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.

## Questions About Topless Females

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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 [REDACTED]  
7 [REDACTED] 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