

To: Sharon Churcher [Sharon.Churcher@mailonSunday.co.uk]
From: Virginia Giuffre
Sent: Wed 6/8/2011 11:19:55 PM
Importance: Normal
Subject: Re: Virginia Roberts
Received: Wed 6/8/2011 11:19:55 PM

Hi Buddy,

You are absolutely right...nail biting is an understatement of the century!!!

We didn't have any trouble with spiders or anything like that yesterday, it was more my daughter that gave everyone a spook! She wandered off when I turned my back to look at homemade jam and found her outside in the bush chasing the roo's!! My own miniature Tarzan!!!

My fingers and toes are crossed and I'm thinking positive!!!

Much Love,
Jenna

--- On Wed, 8/6/11, Sharon Churcher <Sharon.Churcher@mailonSunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>

Subject: Re: Virginia Roberts

TOC

Received: Wednesday, 8 June, 2011, 11:59 AM

Roots. You lucky things - but did you have to duck under spider webs? They were strung between trees when I went.

Re Jarred: it is a nailbiting wait but remember he is only one agent. He was keen to see it which is good. If he doesn't go for it, there are others. Different tastes. When did you send it?

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$$X(\mathbb{C})\}$$

From: Virginia Giuffre [REDACTED]
Sent: Wednesday, June 08, 2011 07:27 AM
To: Sharon Churcher
Subject: Re: Virginia Roberts

Dearest Shazza,

Once again you have really outdone yourself...MANY, MANY, THANKS!!!

I took the kids to the Australian Walkabout Park today and enjoyed the scenic walks and many kangaroos. Rob and I had good chuckle about our adventures at the Reptile Park with you and Mike ...good times!!! Have you heard from Mike? I hope he is well and if you ever speak, tell him I sent a BIG hello.

I really appreciate everything you have helped with, as a friend you have gone beyond the call of duty!!!

I hope we hear back from Jarred soon!!

xoxoxo Jenna

--- On Wed, 8/6/11, Sharon Churcher <Sharon.Churcher@mail.on.sunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mail.on.sunday.co.uk>

Subject: Virginia Roberts

To: "jarred halperin agent (jarred@objectivecent.com)" <jarred@objectivecent.com>

Cc: "Virginia Giuffre" <

Received: Wednesday, 8 June, 2011, 2:31 AM

Hi Jarred

Hopefully you have Virginia's book pitch by now.

She has some amazing names which she can share with you in confidence and I think she also has a human interest story that could appeal to the Oprah/female set as well as the Wall Streeters who follow Epstein – a hedge fund king.

Here are a few of our stories about Virginia, plus some examples of the massive US and other international media pickup. Vanity Fair are doing a piece I believe in their August issue. The FBI have reopened the Epstein case due to Virginia's revelations. I also am attaching a link to a NY Magazine profile of Epstein....written before his world combusted. The FBI believe he was essentially running a private – and mobile -- brothel for some of the world's richest and most influential men.

He got off the first time round after retaining Kenneth Starr (who witchhunted Bill Clinton) and Alan Dershowitz (von Bulow's appeal lawyer, who inspired the movie Reversal of Fortune). The US Justice Dept is investigating corruption allegations against at least one prosecutor involved in the case.

Best regards,

Sharon

<http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-17-sex-offender-friend-flew-Britain-meet-him.html>

<http://www.dailymail.co.uk/news/article-1363452/Bill-Clinton-16-year-old-masseuse-I-met-twice-claims-Epsteins-girl.html>

http://www.nypost.com/p/news/local/manhattan/pervy_magui_lent_me_out_BaIV1IrcQq9ADFOXewiy0J

http://blogs.villagevoice.com/runningsared/2011/02/virginia_robert.php

<http://billionsairas.forbes.com/article/03rxgt12/P9ny> (This one, in Forbes Magazine, seems to require subscribing but you get the gist)

<http://www.telegraph.co.uk/news/uknews/theroyalfamily/8362690/Prince-Andrew.html>

<http://www.dailymail.com.au/news/the-prince-a-paedophile-and-the-sex-slave-teen/story-edfreuy9-1226013733994>

http://nymag.com/nymetro/news/people/n_7912/

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EXHIBIT PP

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq.
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Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.
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5 lmenninger@hmflaw.com
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6 Appearng on behalf of the
Defendant

7 Also Present:

8 Ann Lundberg, Paralegal
Maryvonne Tompkins, Videographer

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Pursuant to Notice and the Federal Rules
of Civil Procedure, the continued video
deposition of VIRGINIA GIUFFRE, called by Defendant,
was taken on Monday, November 14, 2016, commencing at
8:04 a.m., at 150 East 10th Avenue, Denver, Colorado,
before Pamela J. Hansen, Registered Professional
Reporter, Certified Realtime Reporter and Notary
Public within Colorado.

* * * * *

T N D F X

11 VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II
12 EXAMINATION PAGE
13 By Ms. Menninger 354

1 INDEX OF EXHIBITS (continued)

2	3	4	INITIAL REFERENCE																	
5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
		DESCRIPTION																		
		Exhibit 1	Settlement Agreement and General Release	355																
		Exhibit 2	List of names	370																
		Exhibit 3	Photocopy of photograph	408																
		Exhibit 4	Photocopy of photograph, with attachments	411																
		Exhibit 5	Photocopy of photograph, with attachments	417																
		Exhibit 6	Photocopy of photograph, with attachments	423																
		Exhibit 7	Statements	437																
		Exhibit 8	History of education, with attachment	462																
		Exhibit 9	Application for Employment, with attachment	474																
		Exhibit 10	The Great Outdoors Community Services Association, Inc. Termination Form, with attachments	481																
		Exhibit 11	7/6/2016 letter to Schultz from Hayek, with attachments	484																
		Exhibit 12	Patient Registration Information, with attachments	490																
		Exhibit 13	CVS Prescription Records document, 7/29/2016, with attachment	502																
		Exhibit 14	Affidavit of Custodian of Records, Walgreen Company, with attachments	507																

	DESCRIPTION	INITIAL REFERENCE
1		
2		
3	Exhibit 15 Patient Health Summary, Clifton Beach Medical & Surgical, printed on 6/28/2016	512
4		
5	Exhibit 16 Portions of deposition transcript of Virginia Giuffre taken May 3, 2016	533
6		
7	Exhibit 17 Amendment/Errata Sheet signed May 31, 2016 by Virginia Giuffre	540
8		
9	Exhibit 18 Ad for Mar-a-Lago Club	548
10		
11	Exhibit 19 The Mar-a-Lago Club, L.C. Employment Policies, October 28, 1995	549
12		
13	Exhibit 20 Page from the Mar-a-Lago Club Employment Policies, Revised 10/2001	550
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 didn't see them take pictures of the backs of them.

2 I'm not too sure who.

3 Q You don't remember sending to them a
4 photograph that included this wood around another
5 photograph?

6 A No.

7 Q Okay. You have mentioned a journalist by
8 the name of Sharon Churcher.

9 A Yes.

10 Q You are aware that Sharon Churcher
11 published news stories about you?

12 A Yes.

13 MS. MCCAWLEY: Objection.

14 Go ahead.

15 Q (BY MS. MENNINGER) Is anything that you
16 have read in Sharon Churcher's news stories about you
17 untrue?

18 A I think Sharon did print some things that
19 I think she elaborated or maybe misheard. But, I
20 mean, if you have a specific document to show me, I'd
21 love to look at it and read it and tell you what I
22 think.

23 Q Is there anything, as you sit here today,
24 that you know of that Sharon Churcher printed about
25 you that is not true?

1 A Not off the top of my head. If you show
2 me, like, a news clipping article or something, I can
3 definitely read it for you.

4 Q Is there anything that you know of that
5 Sharon Churcher has printed about Ghislaine Maxwell
6 that is not true?

7 A No, not off -- no, not off the top of my
8 head.

9 Q Is there anything that you recall saying
10 to Sharon Churcher that she then printed something
11 different than what you had said to her?

12 A Yeah, I've read stuff. I mean, I just --
13 I can't remember what, but I read something that I
14 think was, Oh, she got that wrong. I can't remember
15 an exact example off the top of my head.

16 Q Did you ever complain to Sharon Churcher
17 about things that she got wrong?

18 A I didn't see a point. I might have, but
19 I -- I didn't see a point really because it's already
20 printed, you know.

21 Q You had a fairly voluminous set of
22 communications with Sharon Churcher by e-mail,
23 correct?

24 MS. MCCAWLEY: Objection.

25 A Voluminous, like a lot of them?

1 Q (BY MS. MENNINGER) Yes.

2 A Yes.

3 Q And during any of those communications, do
4 you know whether she printed things about you after
5 you had any of those communications?

6 MS. MCCAWLEY: Objection.

7 A I don't know. I know a lot of stuff was
8 printed, and I never really stopped to read who
9 printed the article, or wrote the article, I should
10 say. Sorry.

11 Q (BY MS. MENNINGER) Okay. I'll show you
12 Defendant's Exhibit 7.

13 (Exhibit 7 marked.)

14 THE DEPONENT: Thank you.

15 Q (BY MS. MENNINGER) I'll let you read
16 through the statements on the first page there, and
17 if there is anything that is not absolutely true,
18 just put a check by it and we'll come back to it.

19 A It's not very clear how she wrote it. "I
20 flew to the Caribbean with Jeffrey and then Ghislaine
21 Maxwell went to pick up Bill in a huge black
22 helicopter that Jeffrey had bought her."

23 That wasn't an eyewitness statement.
24 Like, I didn't see her do it. Ghislaine was the one
25 who told me about that; that she's the one who flew

1 Bill.

2 Q All right. If you just want to put a
3 check by it, then we'll just come back and talk about
4 each one.

5 A Okay.

6 Q Just to move things along.

7 A Okay. I have made three checkmarks.

8 Q All right.

9 MS. MCCAWLEY: And I just -- before you
10 continue, I just want to identify for the record,
11 since this doesn't have any identifiers on it, are
12 you representing that these are statements from
13 Sharon Churcher?

14 MS. MENNINGER: I'm not representing
15 anything. I'm asking the witness questions about
16 these statements. I asked her is anything on here
17 not true. That's all I asked her.

18 Q (BY MS. MENNINGER) So which ones did you
19 put checkmarks by, Ms. Giuffre?

20 A I'd have been -- I'm sorry. "I'd have
21 been about 17 at the time. I flew to the Caribbean
22 with Jeffrey and then Ghislaine Maxwell went to pick
23 up Bill in a huge black helicopter that Jeffrey had
24 bought her."

25 Q Okay. And what else did you put a check

1 by?

2 A "I used to get frightened flying with her
3 but Bill had the Secret Service with him and I
4 remember him talking about what a good job" --
5 sorry -- "job she did."

6 Q Okay. And what else did you put a check
7 by?

8 A "Donald Trump was also a good friend of
9 Jeffrey's. He didn't partake in any sex with any of
10 us but he flirted with me. He'd laugh and tell
11 Jeffrey, 'you've got the life.' "

12 Q Other than the three you've just
13 mentioned --

14 A Yeah.

15 Q -- everything else on here is absolutely
16 accurate?

17 MS. MCCAWLEY: Objection.

18 A Yes. Well, to the best of my
19 recollection, yes.

20 Q (BY MS. MENNINGER) All right. What is
21 inaccurate about, "I'd have been about 17 at the
22 time. I flew to the Caribbean with Jeffrey and then
23 Ghislaine Maxwell went to pick up Bill in a huge
24 black helicopter that Jeffrey had bought her"?

25 A Because it makes it kind of sound like an

1 eyewitness thing.

2 Q Okay. Did you say that statement to
3 Sharon Churcher?

4 A I said to Sharon that Ghislaine told me
5 that she flew Bill in the heli- -- the black
6 helicopter that Jeffrey bought her, and I just wanted
7 to clarify that I didn't actually see her do that. I
8 heard from Ghislaine that she did that.

9 Q You heard that from Ghislaine, and then
10 you reported to Sharon Churcher that you had heard
11 that from Ghislaine.

12 A Correct.

13 MS. MCCAWLEY: Objection.

14 A I heard a lot of things from Ghislaine
15 that sounded too true -- too outrageous to be true,
16 but you never knew what to believe, so...

17 Q (BY MS. MENNINGER) Okay. And after
18 Sharon Churcher printed what she said you said, did
19 you complain to her that it was inaccurate?

20 A I might have verbally with her, but again,
21 I didn't see a point in making a hissy over it
22 because what was done was done. She had already
23 printed.

24 Q What was inaccurate about, "I used to get
25 frightened flying with her but Bill" said -- "had the

1 Secret Service with him and I remember him talking
2 about what a good job she did"?

3 A I just don't remember saying that to her.
4 I don't remember saying I remember him talking about
5 what a good job she did.

6 Q All right.

7 A I just don't remember that at all.

8 Q Okay. And I guess, just to be clear, my
9 questions wasn't do you remember saying this to
10 Sharon Churcher; my question is, is that statement
11 accurate?

12 MS. MCCAWLEY: Well, objection.

13 Q (BY MS. MENNINGER) Did you used to get
14 frightened flying with her?

15 A Yes.

16 Q Okay. Did Bill have the Secret Service
17 with him?

18 A They were there, but not like on the --
19 not where we were eating.

20 Q Do you remember Bill talking about what a
21 good job she did?

22 A I don't remember that.

23 Q So what is inaccurate about that
24 statement?

25 A I just -- it's inaccurate because I don't

1 remember him talking about what a good job she did.

2 I don't remember that.

3 Q Does it inaccurately suggest that Bill had
4 the Secret Service with him on a helicopter?

5 MS. MCCAWLEY: Objection.

6 A Well, not being an eyewitness to it, I
7 wouldn't be able to tell you. I can't tell you what
8 I don't know.

9 Q (BY MS. MENNINGER) And do you believe you
10 said that statement to Sharon Churcher?

11 A I mean, Sharon and I talked a lot, and if
12 she misheard me or just wrote it in the way that she
13 thought she should, I have no control over that. So
14 I'm not too sure.

15 Q Did she record your interviews?

16 A Some of them. Some of them she didn't. I
17 mean, we, like -- we, like, met for like a week, and
18 we spent a lot of time together, and then even after
19 that we just continued, like, kind of a friendship.

20 Q All right. What's inaccurate about the
21 last statement on that page?

22 A "Donald Trump was also a good friend of
23 Jeffrey's." That part is true.

24 "He didn't partake in any" of -- "any sex
25 with any of us but he flirted with me." It's true

1 that he didn't partake in any sex with us, and but
2 it's not true that he flirted with me. Donald Trump
3 never flirted with me.

4 Then the next sentence is, "He'd laugh and
5 tell Jeffrey, 'you've got the life.'" I never said
6 that to her.

7 Q When you say, "he didn't partake in any
8 sex with any of us," who is "us"?

9 A Girls. Just --

10 Q How do you know who Donald Trump -- Trump
11 had sex with?

12 A Oh, I didn't physically see him have sex
13 with any of the girls, so I can't say who he had sex
14 with in his whole life or not, but I just know it
15 wasn't with me when I was with other girls.

16 Q And who were the other girls that you were
17 with in Donald Trump's presence?

18 A None. There -- I worked for Donald Trump,
19 and I've met him probably a few times.

20 Q When have you met him?

21 A At Mar-a-Lago. My dad and him, I wouldn't
22 say they were friends, but my dad knew him and they
23 would talk all the time -- well, not all the time but
24 when they saw each other.

25 Q Have you ever been in Donald Trump and

1 Jeffrey Epstein's presence with one another?

2 A No.

3 Q What is the basis for your statement that
4 Donald Trump is a good friend of Jeffrey's?

5 A Jeffrey told me that Donald Trump is a
6 good friend of his.

7 Q But you never observed them together?

8 A No, not that I can actually remember. I
9 mean, not off the top of my head, no.

10 Q When did Donald Trump flirt with you?

11 A He didn't. That's what's inaccurate.

12 Q Did you ever see Donald Trump at Jeffrey's
13 home?

14 A Not that I can remember.

15 Q On his island?

16 A No, not that I can remember.

17 Q In New Mexico?

18 A No, not that I can remember.

19 Q In New York?

20 A Not that I can remember.

21 Q All right. If you could turn to the
22 second page and read through those. Let me know if
23 any of those are inaccurate. Just put a check by
24 them and then we'll come back.

25 A Okay.

1 MS. MCCAWLEY: Before you go, Virginia,
2 I'm going to object to the use of the second page of
3 this document. There's no time frame on it. There's
4 no source reference to it, so it's entirely unclear
5 where this has come from.

6 Q (BY MS. MENNINGER) Okay. Are you done?

7 A Yes.

8 Q Okay. What's the first one you've put a
9 check by?

10 A "The hammock photo was all over the
11 houses," in parentheses. And Bill Clinton and -- I'm
12 sorry, "Bill Clinton and Andrew," in parentheses,
13 "had to have seen it."

14 "All over the houses" is not my statement
15 and an exaggeration. They did have that picture in
16 the houses. And I believe, if I remember the
17 conversation correctly, she asked, Could have Bill
18 Clinton and Andrew seen the picture? And I said,
19 Yes, it's possible that they could have seen it.

20 So, I mean, it's just that -- it's not
21 that it's totally inaccurate. I just think it's like
22 journalist writing, had to have seen it. It doesn't
23 mean they saw it. I just think that if it was in
24 front of them, they would have seen it.

25 Q So she told you that -- you told her that

1 the photograph was in the houses -- houses?

2 A Yes. I know he had it in New York on his
3 desk. I know he had it in Palm Beach. I know he had
4 it in the Caribbean. And I don't know if he had it
5 in New Mexico. I can't remember New Mexico. Maybe.

6 Q Where in Palm Beach was the photograph?

7 A The massage room.

8 Q Was that -- you did not say that they --
9 it was all over the houses?

10 A Correct. All over the houses would imply
11 that it's everywhere in the house, so....

12 Q You did not say that Andrew and Clinton
13 had to have seen the photograph?

14 A Correct. I -- it was more of a, if they
15 were in front of it, they would have seen it, kind of
16 a thing. I'm not saying it right. But it wasn't,
17 like, had to have seen it.

18 Q All right. What's the next statement that
19 you put a check by?

20 A I'm sorry, excuse me. My kids shared a
21 beautiful cough with me again.

22 "I spent four years as a millionaire's
23 personal masseuse."

24 Q What is inaccurate about that statement?

25 A We now know, according to the timelines

1 that Mar-a-Lago was able to provide for us, that it
2 was not four years.

3 Q How many years was it?

4 A More like 2-1/2, I think, if I'm right, or
5 two. I'm sorry, I'm really bad at math. But yes,
6 the two period.

7 Q What's the next statement that you have
8 put a check by?

9 A "I was a pedophile's dream." I think she
10 took that out of context and made that her own little
11 headline.

12 Q Did you say that to her?

13 A I said something along the line like, I --
14 the -- the pedos loved me because I would do
15 everything that they wanted for them. But do I think
16 that -- yeah, I -- I know she made that line up
17 herself, the pedos -- pedophile's dream.

18 Q What's the next one you put a check by?

19 A I put a question mark next to the next
20 one. It says, "Three years later she was reunited
21 with her family." I don't know what that pertains
22 to. I don't know what timeline that means.

23 Q Was there a period of three years where
24 you were not with your family?

25 A There's been longer periods than that

1 that -- when I wasn't with my family. That's what I
2 mean, I don't understand where that comes from.

3 "Three years later she was reunited with her family."

4 Q Prior to 2002, was there a period of three
5 years where you were not with your family?

6 A No.

7 Q Okay. Did you say to Sharon Churcher,
8 three years later, she was reunited with her family?

9 A That's what I don't understand. I don't
10 even know what that time periods pertains to.

11 Q Do you recall saying that to Sharon
12 Churcher?

13 A No.

14 Q What's the next one you put a check by?

15 A "After about two years he started to ask
16 me to entertain his friends."

17 Q What's wrong with that statement?

18 A It wasn't two years. I don't know where
19 she got that from.

20 Q Okay. How long was it?

21 A Like, I can't give you an exact time
22 period, but it wasn't right in the beginning. It was
23 after my training, or so to speak training. So, I
24 mean, my best guesstimate would be anywhere between
25 four to six months.

1 Q So you did not say to Sharon Churcher,
2 "After about two years he asked me to entertain his
3 friends"?

4 A Correct.

5 Q What's the next one you put a check by?

6 A That's it. That's all I put a checkmark
7 next to.

8 Q So the rest of these are absolutely
9 accurate?

10 A Nothing a journalist writes is absolutely
11 accurate, but it's -- it sounds accurate, yes.

12 Q Do you recall Jeffrey Epstein saying to
13 you, "I've got a good friend and I need you to fly to
14 the island to entertain him, massage him and make him
15 feel how you make me feel"?

16 MS. MCCAWLEY: Objection.

17 Go ahead.

18 A I do remember him saying that, and I think
19 that's more of a general- -- generalization for all
20 the times that I was sent to the -- where is this --
21 the island to entertain people. And that would be a
22 quote that she made but from my words saying that's
23 what he said to me when I had to go be with these
24 people that he sent me to.

25 Q (BY MS. MENNINGER) Did you say that

1 sentence to her?

2 MS. MCCAWLEY: Objection.

3 A I -- I can't remember. Like I said, I
4 think it's more of a generalization.

5 Q (BY MS. MENNINGER) Did you meet Al Gore?

6 A Yes.

7 Q Did you meet Heidi Klum?

8 A Yes.

9 Q Did you meet Naomi Campbell?

10 A Yes.

11 Q Did you go on a six-week trip with Epstein
12 in 2001?

13 A Yeah. Yes. Sorry.

14 Q When in 2001 did you go on a six-week trip
15 with him?

16 A I don't remember exactly when it was, but
17 it's that -- it's the one where we went to Tangier,
18 Morocco, England. I can't remember where else we
19 went. France.

20 Q Did the FBI tell you that Epstein had
21 hidden cameras watching you the entire time, even
22 when you were in the bathroom?

23 A Yes.

24 Q Did the FBI tell you "Everything he did
25 was illegal because I was under age"?

1 A Yes.

2 Q Who in the FBI told you that?

3 A Whichever agent I was talking to.

4 Q Which agent were you talking to?

5 A I can't remember. I know I was talking to
6 Jason Richards, and there was a girl, I think -- I
7 want -- I want to say her name was Christina Pryor,
8 just off the top of my head. And then I think there
9 was two other agents actually at the consulate
10 building. I don't remember their names. Very hazy.

11 Q When was this conversation with the FBI?

12 A After Sharon printed the articles, the
13 first articles that came out. I don't know how many
14 she printed, but when the first articles came out,
15 after that the FBI contacted me.

16 Q And was the statement that the FBI told
17 you "Everything he did was illegal because I was
18 under age," in response to you telling them that you
19 were age 15 when you met Jeffrey?

20 MS. MCCAWLEY: Objection.

21 A Well, that was the closest proximity I had
22 to go off of.

23 Q (BY MS. MENNINGER) Okay.

24 A So, yes. Although I still was under age,
25 I mean, even if I was 16 and 17.

1 Q Okay. And then if you could do the last
2 page, same way; a check by anything that's not
3 absolutely accurate.

4 MS. MCCAWLEY: Okay. I'm going to object
5 to this as the last page has no identifier of time or
6 source on it.

7 A Okay. I'm ready.

8 Q (BY MS. MENNINGER) All right. Which ones
9 are inaccurate?

10 A The first one is, "Virginia got a
11 part-time job as a changing room assistant." I was a
12 full-time person there. Sorry.

13 Q Okay. So did you say that to Sharon?

14 A Again, I don't remember that exact
15 conversation, but I know it was a full-time job,
16 and -- I mean, full-time as in the, you know, the 9
17 to 5 or whatever hours it was, so it wasn't
18 part-time. I don't remember the exact conversation
19 that we had.

20 Q Okay. What's the next thing you put a
21 check by?

22 A I put a question mark next to, "Another
23 lady led me into Jeffrey's bedroom. The lady walked
24 me straight through into the massage room."

25 I have no idea what circumstance that

1 pertains to. Again, I don't know what that means. I
2 don't even know what other lady she's talking about.
3 So...

4 Q So you don't recall saying that to Sharon
5 Churcher?

6 A Correct. I don't even know what it means.

7 Q Okay. What's the next one you have a
8 check by?

9 A "Afterwards, she was given two \$100 bills
10 and told to return the next day. That was the
11 beginning of the four years she spent with Epstein."

12 Q All right. What's wrong about that
13 statement?

14 A Well, again, I just want to say that the
15 four years was inaccurate based upon memory and not
16 an actual timeline that we were able to get.

17 Q Did you say that to Sharon Churcher, that
18 it was four years?

19 A I don't know if I said that to her or --
20 oh, yeah, did I tell her it was four years? Yes, I
21 did. I'm sorry.

22 Q Okay. What else did you put a check by?

23 A Well, this one is a question mark again.

24 "Radar online has obtained exclusive diary entries of
25 a Teen Sex Slave."

1 It wasn't really a diary. It was, like, I
2 don't know how many pages of something that I wrote,
3 and Sharon used it, so...

4 Q Did you tell Sharon it was your diary
5 entry?

6 A She knew it wasn't a diary entry. No.

7 Q Okay. Were you a teen sex slave?

8 A Yes.

9 Q What's the next one you have a checkmark
10 by?

11 A "I also saw Prince Andrew at a Ranch in
12 New Mexico."

13 Q Did you tell that to Sharon Churcher?

14 A No. And I think it's a mistake. Maybe
15 she meant somewhere else, but because we had been
16 talking about so much, maybe she just put New Mexico.
17 I don't think Sharon intentionally lied on any of
18 these. I just -- I think we talked so much over a
19 period of a week, and then after that we had phone
20 conversations, and so on and so forth, that some of
21 the information just got misheard or mishandled, or
22 whatever.

23 Q And what was printed was inaccurate?

24 A Was that printed? I don't -- I don't
25 remember reading that in the papers, but if it was

1 printed it's inaccurate.

2 Q Do you recall reading any of the ones that
3 you put a checkmark by in the papers?

4 A There's been so much printed, it's hard
5 for me to remember. I mean, yes, it does sound like
6 stuff I read before.

7 Q When you spoke with Sharon Churcher, you
8 agreed to waive your anonymity, right?

9 A I did.

10 Q Why did you agree to do that?

11 A I felt it was time for me to tell my
12 story. I felt it was a good time for me to come
13 forward. I had done so much healing, and I thought
14 that it would be good for other people to hear what's
15 going on, how it's happening, how vulnerable other
16 girls can be and not even know the damage that it
17 causes later in life. And I just thought it would be
18 the right thing to do to come forward.

19 Q You authorized her to publish your name?

20 A I did.

21 Q And your photograph?

22 A Yes.

23 Q In 2011?

24 A I think that was the year, yes.

25 Q You posed for photographs with her,

1 I, VIRGINIA GIUFFRE, do hereby certify that
2 I have read the foregoing transcript and that the
3 same and accompanying amendment sheets, if any,
4 constitute a true and complete record of my
5 testimony.

6 _____
7 Signature of Deponent
8

- () No amendments
9 () Amendments attached

10 Acknowledged before me this _____ day
11 of _____, 20____.

12
13 Notary Public: _____
14

15 My Commission Expires: _____
16

Seal:

17 PJH
18
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20
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25

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Pamela J. Hansen, do hereby certify that
5 I am a Registered Professional Reporter and Notary
6 Public within the State of Colorado; that previous to
7 the commencement of the examination, the deponent was
8 duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 23rd day of November, 2016.

20 My commission expires September 3, 2018.

21

22 _____
23 Pamela J. Hansen, CRR, RPR, RMR
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202

Epstein did invite two young brunettes to a dinner which he gave on his Caribbean island for Mr. Clinton shortly after he left office.

I'd have been about 17 at the time. I flew to the Caribbean with Jeffrey and then Ghislaine Maxwell went to pick up Bill in a huge black helicopter that Jeffrey had bought her.

I remember she was very excited because she got her license around the first year we met.

I used to get frightened flying with her but Bill had the secret service with him and I remember him talking about what a good job she did.

I don't remember seeing Bill again on the trip but I assume Ghislaine flew him back.

Virginia disclosed that Mr. Clinton's vice-president Al Gore and his wife, Tipper, were also guests of Epstein on his island.

Virginia said that yet another American liberal icon, Senator George Mitchell, frequently visited Epstein's New York residence. Mr. Mitchell, aged 77, was very close to Jeffrey, Virginia recalled.

I also met Naomi Campbell at a birthday party of hers on a yacht in the South of France. She is a friend of Ghislaine's but she was a real bitch to me.

Donald Trump was also a good friend of Jeffrey's. He didn't partake in any sex with any of us but he flirted with me. He'd laugh and tell Jeffrey, 'you've got the life.'

EXHIBIT

Guttre
AGREN BLANDO REPORTING
11-14-16

Ghislaine took nude picture of me lying naked in a hammock, posed with my legs open, a bit provocatively that I gave to Jeffrey for his birthday.

✓ The hammock photo was "all over the houses" and Bill Clinton and Andrew "had to have seen" it.

✓ I spent four years as millionaire's personal masseuse.

I was living on the streets, beaten up and slept with at least two older men in return for food.

While on the streets, I slept with men for money.

✓ I was a paedophile's dream.

✗ Three years later she was reunited with her family.

✓ After about two years, he started to ask me to 'entertain' his friends.

She recalls he said "I've got a good friend and I need you to fly to the island to entertain him, massage him and make him feel how you make me feel."

The way it usually worked was I'd been sent to meet a man on the private island Jeffrey owned in the Caribbean, or at his ranch in New Mexico, which was really isolated.

I met famous friends of his such as Al Gore and Heidi Klum and Naomi Campbell.

She was, she says, delighted when Epstein invited her to accompany him on a six-week trip in 2001.

FBI told me that Epstein had hidden cameras watching me the entire time even when I was in the bathroom. I was so embarrassed.

The FBI told me everything he did was illegal because I was under age.

✓ Virginia got a part-time job as a changing room assistant.

I told Ghislaine I wanted to become a masseuse and she said she worked for a very wealthy gentleman who was looking for a traveling masseuse. I'd get training and be paid well.

✓ Another lady led me into Jeffrey's bedroom. The lady walked me straight through into the massage room.

✓ Afterwards, she was given two \$100 bills and told to return the next day. That was the beginning of the four years she spent with Epstein.

✓ Radar Online has obtained exclusive "Diary entries" of "Teen Sex Slave".

I led Prince Andrew into the upstairs bathroom next to the room I was staying in.

I was doing my best trying to put on a good show for him by slowly undressing and started to pour a bath.

He was caressing every part of my naked body and filling my head with endless compliments about my blossoming figure.

He paid careful attention to my toes and was licking them.

✓ I also saw Prince Andrew at the Ranch in New Mexico.

EXHIBIT QQ

To: sharon churcher[sharon.churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Fri 5/20/2011 2:20:09 AM
Importance: Normal
Subject: How ya doing??
Received: Fri 5/20/2011 2:20:09 AM

Hi Buddy,

I hope you are stopping to smell the daffodils once in a while and having a good day!! I am so excited today because I can go sign with an agent as my contract is finished with "Mail On Sunday"...YEAH!! Sandra and I have been working really hard to get me ready for my trip to the U.S in a few weeks and I was wondering if I could use your advice again. She has got an INTL agent who is interested in speaking with me and I don't want to say "Yes" to the first bite because I'm not sure what to look for in an agent. What could you recommend that I do? I will send Jarred and Irene (your recommended agents) a copy of the synopsis and sample chapters but how do I choose the right one for "The Story"? Do you know anyone else that might be interested in this as well? If so, i am keen on speaking with anyone who might be. I am soooooooo excited about this and will keep you updated with the progressing events. When I am in New York we have to meet up for some city shopping and take the kids to Central Park to see the Zoo, given there will be no masturbating kangaroo's for you to make friends with, but who know's? I am looking forward to showing Robbie around and he's got some family out there as well we have to catch up with. Such busy times, but I'm loving it!! Anyways I hope your taking care and catch me up on all your fun times!!

Take care,
Jenna

EXHIBIT RR

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)
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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.
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4 Denver, CO 80203
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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
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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.

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T N D E X

EXAMINATION **PAGE**

MS. MENNINGER

PRODUCTION REQUEST(S):

PAGE

(None.)

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(None.)

(None.)

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1 INDEX OF EXHIBITS
23 INITIAL
4 DESCRIPTION REFERENCE
5

6	Exhibit 1	Complaint and Demand for Jury	17
7		Trial re Jane Doe No. 102 v.	
8		Jeffrey Epstein	
9	Exhibit 2	Jane Doe #3 and Jane Doe #4's	21
10		Motion Pursuant to Rule 21 for	
11		Joinder in Action	
12	Exhibit 3	Declaration of Virginia L.	23
13		Giuffre re Jane Doe #1 and Jane	
14		Doe #2 vs. United States of	
15		America	
16	Exhibit 4	Declaration of Jane Doe 3 re	31
17		Jane Doe #1 and Jane Doe #2 vs.	
18		United States of America	
19	Exhibit 5	Declaration of Virginia Giuffre	33
20		re Bradley J. Edwards and	
21		Paul G. Cassell vs. Alan M.	
22		Dershowitz	
23	Exhibit 6	FBI documentation, date of entry	36
24		7/5/13	
25	Exhibit 7	Document titled Telecon,	39
		Participants Jack Scarola, Brad	
		Edwards, Virginia Roberts. Re	
		Edwards adv. Epstein, 4/7/11,	
		(23 pages of transcription)	
	Exhibit 8	The Billionaire's Playboy Club,	41
		By Virginia Roberts	
	Exhibit 9	Plaintiff's Response and	44
		Objections to Defendant's First	
		Set of Discovery Requests to	
		Plaintiff re Giuffre v. Maxwell	

	DESCRIPTION	INITIAL REFERENCE
3	Exhibit 10 Plaintiff's Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff	46
4		
5		
6	Exhibit 11 Undated Declaration of Virginia Giuffre re Plaintiff's Supplemental Response and Objections to Defendant's First Set of Discovery Requests served on March 22, 2016	46
7		
8		
9		
10	Exhibit 12 Plaintiff's Second Amended Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff	47
11		
12		
13	Exhibit 13 Mrs. Virginia Giuffre resume	67
14	Exhibit 14 Compilation of e-mails re Open Position - Virginia Giuffre	68
15	Exhibit 15 Virginia Lee Roberts passport application	180
16		
17	Exhibit 16 Composite of e-mail strings	251
18	Exhibit 17 Compilation of e-mails between Giuffre and Silva and others	259
19	Exhibit 18 Compilation of e-mails between Virginia Giuffre and Sandra White	265
20		
21	Exhibit 19 Compilation of e-mails between Marianne Strong and Virginia Giuffre	269
22		
23	Exhibit 20 Compilation of e-mails between Virginia Roberts and Jason Richards	276
24		
25		

	DESCRIPTION	INITIAL REFERENCE
3	Exhibit 21	Compilation of e-mails between Sharon Churcher and Virginia Giuffre 284
4	Exhibit 22	Compilation of e-mails among Sharon Churcher, Michael Thomas, Virginia Giuffre and others 287
5	Exhibit 23	Compilation of May 2011 e-mails among Sharon Churcher, Virginia Giuffre, Paulo Silva and others 288
6	Exhibit 24	Compilation of June 2011 e-mails between Virginia Giuffre and Sharon Churcher 289
7	Exhibit 26	PR Hub Statement on Behalf of Ghislaine Maxwell article 300
8	Exhibit 27	1/2/15 e-mail from Ross Gow to To Whom It May Concern 309
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
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1 Some names have been changed in order to protect
2 other people.

3 Q (BY MS. MENNINGER) Protect their privacy?

4 A Protect their privacy, yeah, I would say,
5 just not getting them involved in, if this were to
6 ever go public.

7 Q Well, again, without rereading the whole
8 manuscript --

9 A Reading it, yeah. I'm trying to see if I
10 can -- see something in here.

11 Q Let me narrow my question and maybe that
12 will help.

13 A Yes.

14 Q Is there anything -- well, first of all,
15 did you author that entire manuscript?

16 A Yes, I did.

17 Q Did anyone else author part of that
18 manuscript?

19 A Do you mean did anyone else write this
20 with me?

21 Q Right.

22 A No.

23 Q That's all your writing?

24 A This is my writing.

25 Q Okay. To the best of your recollection,

1 as you sit here right now, is there anything in that
2 manuscript about Ghislaine Maxwell that is untrue?

3 A I don't believe so. Like I said, there is
4 a lot of stuff that I actually have left out of here.

5 Q Um-hum.

6 A So there is a lot more information I could
7 put in there. But as far as Ghislaine Maxwell goes,
8 I would like to say that there is 99.9 percent of it
9 would be to the correct knowledge.

10 Q All right. Is there anything that you --
11 and I understand you're doing this from memory. Is
12 there anything that you recall, as you're sitting
13 here today, about Ghislaine Maxwell that is contained
14 in that manuscript, that is not true?

15 A You know, I haven't read this in a very
16 long time. I don't believe that there's anything in
17 here about Ghislaine Maxwell that is not true.

18 MR. EDWARDS: I'd just ask, Counsel, if
19 you have anything specific to show her about
20 Ghislaine Maxwell --

21 MS. MENNINGER: I'll ask questions.

22 MR. EDWARDS: -- I'll have her look at it.

23 MS. MENNINGER: I'll ask questions.

24 MR. EDWARDS: I know, but I want the
25 record clear that if she hasn't read it in a long

1 I, VIRGINIA GIUFFRE, do hereby certify that
2 I have read the foregoing transcript and that the
3 same and accompanying amendment sheets, if any,
4 constitute a true and complete record of my
5 testimony.

6

7

8

9 Signature of Deponent

10 () No Amendments

() Amendments Attached

11 Acknowledged before me this

12 _____ day of _____, 2016.

13

14 Notary Public: _____

15 Address: _____

16 _____

17 My commission expires _____

18 Seal:

19

20

21 KAM

22

23

24

25

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Kelly A. Mackereth, do hereby certify
5 that I am a Registered Professional Reporter and
6 Notary Public within the State of Colorado; that
7 previous to the commencement of the examination, the
8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 11th day of May, 2016.

20 My commission expires April 21, 2019.

21

22

23 Kelly A. Mackereth, CRR, RPR, CSR
216 - 16th Street, Suite 600
Denver, Colorado 80202

24

25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

VIRGINIA GIUFFRE,

Giuffre,

15 Civ. 7433

-against-

SEALED
OPINION

GHISLAINE MAXWELL,

Maxwell.

-----X

A P P E A R A N C E S:

Counsel for Giuffre

BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
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Meredith L. Schultz, Esq.

Counsel for Maxwell

HADDON, MORGAN AND FOREMAN, P.C.
150 East Tenth Avenue
Denver, CO 80203
By: Laura A. Menninger, Esq.
Jeffrey S. Pagliuca, Esq.

Sweet, D.J.

The defendant Ghislaine Maxwell ("Maxwell" or the "Maxwell") has moved pursuant to Rule 56, Fed. R. Civ. P., for summary judgment dismissing the complaint of plaintiff Virginia L. Giuffre ("Giuffre" or the "Giuffre") alleging defamation. Upon the facts and conclusions set forth below, the motion is denied.

I. Prior Proceedings

Since the filing of the complaint on September 21, 2015, setting forth Giuffre's claim of defamation by Maxwell, this action has been vigorously litigated, as demonstrated by the 704 docket entries as of March 8, 2017. At issue is the truth or falsity of a January 2015 statement issued by Maxwell. Discovery has proceeded, a joint pretrial order has been filed, and the action is set for trial on May 15, 2017.

The instant motion was heard and marked fully submitted on February 16, 2017.