

1 G Maxwell - Confidential

2 A. No. I did not state that at all,
3 you are mischaracterizing my words and what I
4 said.

5 What I said was that we can all
6 agree and I think at this point there is not
7 one person in this room, however much you
8 would like her to be younger, to say she was
9 not 17 because that has been a very offensive
10 thing that you have all done. So she was 17.
11 At 17 you are allowed to be a professional
12 masseuse and as far as I'm concerned, she was
13 a professional masseuse. There is nothing
14 inappropriate or incorrect about her coming
15 at that time to give a massage. Her entire
16 characterization of her first time at the
17 house was to me an obvious lie, given it was
18 impossible for her entire story to take place
19 given I was speaking to her mother the entire
20 she was at the house.

21 Q. So it was impossible that day, that
22 first day she came and you were speaking to
23 the mother, for Virginia Roberts to have had
24 sex with Jeffrey Epstein during the time that
25 you were outside with her mother?

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2 absolutely 1000 percent that she did not have
3 any type of sexual relations as described by
4 you in your court papers that took place
5 because those allegedly according to her lies
6 involved some aspect of me.

7 As I was standing outside with her
8 mother the entire time, her entire story is a
9 lie. Therefore, to ask me what she did or
10 didn't do during that time, I can only
11 testify to what she said about me, which was
12 1000 percent false.

13 Q. So let's not take the first time,
14 let's take the next time she comes.

15 A. No no, how can do you that, when
16 the basis of this entire horrible story that
17 you have put out is based on this first
18 appalling story that was written, repeated,
19 multiply by the press that lied about her
20 age, lied about the first time she came, lied
21 about and characterized the entire first
22 time. I have been so absolutely appalled by
23 her story and appalled by the entire
24 characterization of it and I apologize
25 sincerely for my banging at the table

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2 earlier, I hope you accept my apology. It's
3 borne out of years of feeling the pressure of
4 this entire lie that she has perpetrated from
5 our first time and whilst I recognize that
6 was -- I hope you forgive me sincerely
7 because it was just the length of time that
8 that terrible story has been told and retold
9 and rehashed when I know it to be 100 percent
10 false.

11 Q. So not the first time she came, but
12 the second time she came or the third time or
13 any time she came, did you ever participate
14 in a massage with her in Jeffrey Epstein's
15 room?

16 A. I have never participated at any
17 time with Virginia in a massage with Jeffrey.

18 Q. Have you ever participated at any
19 time with Virginia in any kind of sexual
20 contact or sexual touching with Jeffrey and
21 Virginia?

22 A. I have not.

23 Q. So we were going through the list
24 of obvious lies and you were talking about
25 the first time which I believe we have

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2 of 18?

3 A. I think we can establish what adult
4 would be.

5 Q. You never interviewed or I know you
6 don't want to use the word hired, whatever
7 your role was, you brought in an exercise
8 instructor that was under the age of 18 to
9 work at the house?

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

12 A. I have already testified that what
13 I was responsible for was to find people who
14 had competencies in whatever area I was
15 looking for. The competencies I was looking
16 for were professional and adult.

17 Q. So there was no exercise instructor
18 that worked at the Palm Beach house or the
19 New York house or the New Mexico house or the
20 USVI under the age of 18?

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

23 A. I can only testify to when I was at
24 the house.

25 Q. Yes.

1 G Maxwell - Confidential

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

4 A. That's not how I would characterize
5 that.

6 Q. How would you characterize it?

7 A. I have testified that I'm
8 responsible for finding professional people
9 to work in the homes, age appropriate adult
10 people, so from pool attendants, to
11 gardeners, to chefs, to housekeepers, to
12 butlers, to chauffeurs and one of the
13 functions was to be able to answer the
14 telephones and in the context of finding
15 someone to answer the telephones, I did look
16 to try to find appropriate people to answer
17 the phones.

18 Q. So did you find Johanna for
19 purposes of that role?

20 A. So in the course of looking for
21 somebody to answer phones at the house,
22 Johanna was one of the people who said that
23 she was willing to answer phones.

24 Q. Did you approach her at her school
25 campus?

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2 Q. List all of the girls you met and
3 brought to Jeffrey Epstein's home for the
4 purposes of employment that were under the
5 age of 18?

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

8 A. I've already characterized my job
9 was to find people, adults, professional
10 people to do the jobs I listed before; pool
11 person, secretary, house person, chef, pilot,
12 architect.

13 Q. I'm asking about individuals under
14 the age of 18, not adult persons, people
15 under the age of 18.

16 A. I looked for people or tried to
17 find people to fill professional jobs in
18 professional situations.

19 Q. So Virginia Roberts was under the
20 age of 18, correct?

21 A. I think we've established that
22 Virginia was 17.

23 Q. Is she the -- sorry, go ahead.

24 Is she the only individual that you
25 met for purposes of hiring someone for

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

4 A. If you want to ask Jeffrey
5 questions about me, you would have to ask
6 him.

7 Q. Have you ever been involved in any
8 illegal activity in your lifetime?

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

11 A. I can't think of anything I have
12 done that is illegal.

13 Q. Have you ever been arrested?

14 A. I have a DUI in the U.K. a long
15 time ago.

16 Q. Is that the only arrest you have on
17 your record?

18 A. Yes.

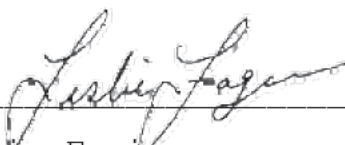
19 Q. I will mark as Maxwell 22 this
20 email?

21 (Maxwell Exhibit 22, email, marked
22 for identification.)

23 Q. This is dated January 21, 2015.
24 It's from Jeffrey Epstein to you, forwarding
25 the Guardian and I would like you to look at

CERTIFICATE

I HEREBY CERTIFY that the witness,
GHISLAINE MAXWELL, was duly sworn by me and
that the deposition is a true record of the
testimony given by the witness.



Leslie Fagin,

Registered Professional Reporter

Dated: April 22, 2016



(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
VIRGINIA L. GIUFFRE,

Plaintiff,

-against- Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

****CONFIDENTIAL****

Continued Videotaped Deposition of
GHISLAINE MAXWELL, the Defendant herein,
taken pursuant to subpoena, was held at
the law offices of Boies, Schiller &
Flexner, LLP, 575 Lexington Avenue, New
York, New York, commencing July 22,
2016, 9:04 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

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2 thought. I really don't recall her, so it's
3 hard for me to testify what I thought about
4 her age at the time.

5 Q. Was Virginia, in the period of
6 around 2000, the youngest person that, as you
7 understood it, was giving Mr. Epstein
8 massages?

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

11 A. Again, I can't testify to her age,
12 but everybody else that I can recall seemed
13 to be again, like I would say, adults.

14 Q. You didn't think Virginia was an
15 adult, did you?

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

18 A. Like I said, I don't recall her. I
19 don't recall thinking about -- my memory is
20 of adults giving Jeffrey massages, and as I
21 don't really remember Virginia around that
22 time, I don't know what I think.

23 Q. You do remember Virginia, about
24 that time back in the 2000s, giving
25 Mr. Epstein massages?

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

4 A. I barely remember her at all.

5 Q. Whether you barely remember her or
6 not, you do remember that back in the period
7 around 2000, Virginia was giving Mr. Epstein
8 massages, right?

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

11 A. Only in the most general terms. It
12 would be somebody who would give him a
13 massage, and that's it.

14 Q. During the period of time back in
15 the period around 2000, when you knew that
16 Virginia was somebody who would give
17 Mr. Epstein a massage, was she somebody who
18 you considered an adult?

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

21 A. I didn't consider her at all
22 because she is not somebody that I really
23 interacted with.

24 Q. It is your testimony that Virginia
25 was not somebody that you interacted with, is

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1 G. Maxwell - Confidential

2 Epstein's home in Palm Beach?

3 MR. PAGLIUCA: Objection to form

4 and foundation.

5 A. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

13 Q. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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2 Q. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

5 A. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

7 A. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

11 Q. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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2 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7

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20

[REDACTED]

21

MR. PAGLIUCA: Objection to form

22

and foundation.

23

[REDACTED]

[REDACTED]

24

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidential

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1 G. Maxwell - Confidential

2 and foundation.

3 A. No.

4 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. PAGLIUCA: Objection to form

9 and foundation.

10 A. I don't know.

11 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. PAGLIUCA: Objection to form

18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin

21 Islands?

22 MR. PAGLIUCA: Objection to form

23 and foundation.

24 A. No.

25 [REDACTED]

Confidential

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MR. PAGLIUCA: Objection to form
and foundation.

Confidential

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1 G. Maxwell - Confidential

2 it to something in the case.

3 MR. BOIES: I think it's tied, but
4 if you instruct her not to answer, it
5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] .

14 A. Can you repeat the question?

15 Q. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [REDACTED]
[REDACTED]
24 . [REDACTED]
[REDACTED]

Confidential

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CERTIFICATE

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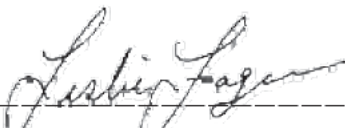
8

I HEREBY CERTIFY that GHISLAINE
MAXWELL, was duly sworn by me and that the
deposition is a true record of the testimony
given by the witness.

9

10

11



Leslie Fagin,

Registered Professional Reporter

12

Dated: July 22, 2016

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(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)



EXHIBIT 12

(Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

LYNN TRUDE MILLER

05/24/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

Agren Blando Court Reporting & Video, Inc.

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
LYNN TRUDE MILLER May 24, 2016

VIRGINIA L. GIUFFRE,
Plaintiff,

v.

GHISLAINE MAXWELL,
Defendant.

APPEARANCES:

S.J. QUINNEY COLLEGE OF LAW, UNIVERSITY OF UTAH
By Paul G. Cassell, Esq.
383 S. University Street
Salt Lake City, UT 84112
Phone: 801.585.5202
Cassellp@law.utah.edu
Appearing on behalf of the
Plaintiff

HUTCHINSON BLACK AND COOK, LLC
By John Clune, Esq.
921 Walnut Street
Suite 200
Boulder, CO 80302
Phone: 303.442.6514
clune@hbcboulder.com
Appearing on behalf of the
Deponent

Agren Blando Court Reporting & Video, Inc.

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.

3 By Laura A. Menninger, Esq.

4 Jeffrey S. Pagliuca, Esq.

5 150 East 10th Avenue

6 Denver, CO 80203

7 Phone: 303.831.7364

8 lmenninger@hmflaw.com

9 jpagliuca@hmflaw.com

10 Appearing on behalf of the

11 Defendant

12 Also Present:

13 Maryvonne Tompkins, Videographer

Agren Blando Court Reporting & Video, Inc.

1 A Because I wasn't told any different.

2 Q Do you know where any -- any source of
3 that information came from? Was it Sky?

4 A It came from Sky.

5 Q Okay. And what do you recall him telling
6 you about when Virginia stopped working at
7 Mar-a-Lago?

8 A She was in a discussion with Mrs. Maxwell
9 to educate her and take her under her wing and be her
10 new momma. That's what I heard.

11 Q Okay. And who told you that?

12 A Sky.

13 Q Okay. And do you remember when Sky told
14 you that?

15 A I don't remember.

16 Q Okay. Did you learn anything else about
17 that, other than what you just said?

18 A No.

19 Q Okay. Do you know where she went to work
20 after Mar-a-Lago?

21 A I think she went with Mrs. Maxwell.

22 Q But do you know where, physically?

23 A Physically, Sky and I dropped her off one
24 day at Mrs. Maxwell's. I did not speak with
25 Mrs. Maxwell. I didn't have anything to say to her.

Agren Blando Court Reporting & Video, Inc.

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 31st day of May, 2016.

20 My commission expires April 21, 2019.

21
22 Kelly A. Mackereth, CRR, RPR, CSR
23 216 - 16th Street, Suite 600
24 Denver, Colorado 80202
25

EXHIBIT 13

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

June 21, 2016

9:17 a.m.

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

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

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. All right.

4 Was SG a licensed massage therapist?

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

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q. And at 14 years old, are you permitted to
10 be a licensed massage therapist?

11 A. Not to my knowledge.

12 Q. After speaking with SG and understanding
13 her account of what took place at Jeffrey Epstein's
14 home, what -- what happened next in the
15 investigation?

16 A. At some point the investigation was turned
17 over to me for follow-up. I know there was trash
18 pulled that was done prior to -- and surveillance
19 that was done prior to the case being turned over to
20 me; and trash pulls being an investigative technique
21 to acquire intelligence, information and evidence.

22 Q. Okay. If we go to page 17, at the top,
23 and, first of all, I will ask you from memory, do
24 you remember if [REDACTED] identified Jeffrey
25 Epstein in a photo lineup?

1 JOSEPH RECAREY - CONFIDENTIAL

2 "a cross-reference"?

3 A. Uh-huh.

4 Q. How is a cross-reference performed? What
5 does that mean?

6 A. When -- when something is
7 cross-referenced, they -- they jot down license
8 plate numbers. They conduct their background into
9 the individuals; photographs, computer research.

10 Q. A cross-reference of Jeffrey Epstein's
11 residence revealed which affiliated names?

12 A. It revealed Nadia Marcinkova, Ghislane
13 Maxwell, Mark Epstein. Also, the cross-reference,
14 any previous reports from the residence as well.

15 Q. During your investigation, did you learn
16 of any involvement that Nadia Marcinkova had with
17 any of the activities you were investigating?

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

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. And what involvement did you learn of
23 Nadia Marcinkova?

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

1 JOSEPH RE CAREY - CONFIDENTIAL

2 THE WITNESS: Nadia was involved sexually
3 with one of the victims at Epstein's request.

4 BY MR. EDWARDS:

5 Q. Okay. Do you remember which victim you're
6 remembering right now?

7 A. AH.

8 Q. Okay. If it indicates in the report that
9 she was also sexually involved with other victims,
10 is that possible as well?

11 A. Yes.

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

14 BY MR. EDWARDS:

15 Q. Okay. The one that you remember in your
16 mind is AH?

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

19 THE WITNESS: Correct.

20 BY MR. EDWARDS:

21 Q. The other name that is on here as a
22 cross-reference is Ghislane Maxwell.

23 Did you speak with Ghislane Maxwell?

24 A. I did not.

25 Q. Did you ever attempt to speak with

1 JOSEPH RECAREY - CONFIDENTIAL

2 Ghislane Maxwell?

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

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

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

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

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

23 BY MR. EDWARDS:

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

1 JOSEPH RECAREY - CONFIDENTIAL

2 actually gave massages at Epstein's home?

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

5 BY MR. EDWARDS:

6 Q. Approximately.

7 MR. PAGLIUCA: Same objection.

8 THE WITNESS: I would say approximately
9 30; 30, 33.

10 BY MR. EDWARDS:

11 Q. And of the 30, 33 or so girls, how many
12 had massage experience?

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

15 THE WITNESS: I believe two of them may
16 have been -- two of them.

17 BY MR. EDWARDS:

18 Q. Okay. And as we go through this report,
19 you may remember the names?

20 A. Correct. Let me correct myself. I
21 believe only one had.

22 Q. And was that -- was that one of similar
23 age to the other girls?

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

1 JOSEPH RE CAREY - CONFIDENTIAL

2 foundation.

3 THE WITNESS: Yes, I did.

4 BY MR. EDWARDS:

5 Q. And were trash pulls done at the property
6 of Jeffrey Epstein?

7 A. Yes.

8 Q. What is the purpose of a trash pull, and
9 what is a trash pull?

10 A. A trash pull is when property is
11 discarded, such as trash, we coordinate with the
12 sanitation department to collect the trash, once it
13 leaves the property, and it's put into an empty well
14 of the trash truck. We acquire the bags, and we
15 sift through the contents of the trash.

16 Q. Did you or another detective from the unit
17 observe each step of the trash pull to make sure
18 that you had a good chain of custody of the
19 evidence?

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

22 THE WITNESS: Yes. The members of
23 the OCTAN unit at that time did.

24 BY MR. EDWARDS:

25 Q. Okay. And what is that process?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. The process --

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

5 THE WITNESS: The process is when the --
6 once you coordinate a trash pull with the
7 sanitation supervisor, you meet with the
8 sanitation worker and ensure that either the
9 can that he's going to place in the well is
10 completely empty and you physically observe him
11 collect the trash and place it into the empty
12 container. And then you follow him to a
13 disclosed area, and we retrieve the bags and
14 you sift through the trash.

15 BY MR. EDWARDS:

16 Q. Okay. What were you looking for in terms
17 of evidentiary value from these trash pulls?

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

20 THE WITNESS: We were looking for any --
21 any form of identification. You were looking
22 for -- to gather any kind of intelligence
23 and/or evidence.

24 BY MR. EDWARDS:

25 Q. Okay. If we go to page 20 of the report,

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

5 A. Yes.

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

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

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

13 BY MR. EDWARDS:

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

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

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

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

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2 BY MR. EDWARDS:

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

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

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

11 BY MR. EDWARDS:

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

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

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

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

22 Do you see that?

23 A. Yes.

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

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2 BY MR. EDWARDS:

3 Q. And then some of the remaining messages,
4 "Johanna, work Sunday at 4 p.m.; A, Monday after
5 school; left message for Courtney W and NT," are
6 these individuals that you later learned were
7 underaged girls that had been to Jeffrey Epstein's
8 home?

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

11 THE WITNESS: That's correct.

12 BY MR. EDWARDS:

13 Q. What types of documents do you remember
14 retrieving from the trash pulls from Jeffrey
15 Epstein's home?

16 A. There was numerous items. It was a lot of
17 handwritten notes on different -- different pads of
18 paper. Some of the pads had names on it, whether it
19 was Epstein, whether it was Ghislane Maxwell,
20 whether it was -- there were phone messages.

21 When I say "phone messages," I mean, you
22 know, the kind that come in a book. They are carbon
23 copied, so the yellow copy always stays with the
24 book, but the white copy is torn off. So there was
25 always a carbon copy of the actual phone message.

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2 THE WITNESS: Correct.

3 BY MR. EDWARDS:

4 Q. And let me go back to the beginning six
5 pages of that exhibit, No. 4.

6 MR. PAGLIUCA: Why don't we just make a
7 copy of it now if we're going to ask questions
8 about it? I'm not trying to --

9 MR. EDWARDS: Yes, I know. It's just the
10 first six pages.

11 (A discussion was held off the record,
12 after which the following proceedings were
13 held:)

14 THE VIDEOGRAPHER: On the record at 10:32.

15 BY MR. EDWARDS:

16 Q. And what were some of the items that were
17 found in -- well, are the documents that you're
18 holding, 1 through 6, an accurate reflection of the
19 items that were found in Jeffrey Epstein's home
20 during the search warrant execution?

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

23 THE WITNESS: Yes.

24 BY MR. EDWARDS:

25 Q. And I believe that you described that some

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2 of the -- that the house appeared to be -- I don't
3 remember the word you used -- sanitized, for lack of
4 a better word?

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

7 BY MR. EDWARDS:

8 Q. How did you know that?

9 A. The computers had been removed from the
10 home.

11 Q. How did you know the computers were
12 removed?

13 A. Based on -- based on the dangling wires
14 left behind, the monitors left, but the actual CPU
15 of it was missing.

16 When you went into the bedroom of Jeffrey
17 Epstein, everything was removed from the -- the
18 shelves, from the armoire.

19 Q. Did you find nude photographs of girls?

20 A. Yes.

21 Q. All right.

22 And what did you do with that evidence?

23 A. That was collected and placed into our
24 crime scene unit.

25 Q. And where is that evidence today?

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2 A. Any evidence that was not returned to its
3 rightful owner was turned over to the FBI.

4 Q. And evidence which would be nude
5 photographs of girls would be evidence not turned
6 back over to Epstein?

7 A. Correct.

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

10 THE WITNESS: Some of the items that were
11 collected were later found to be personal items
12 of the houseman, Janush. I recall reviewing
13 his personal photographs on -- on a micro SD
14 card for, like, photos of him and his wife or
15 girlfriend at the time.

16 BY MR. EDWARDS:

17 Q. And the underaged girls that you had
18 spoken with during your investigation, had they
19 described seeing photographs of naked girls in the
20 house?

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

23 THE WITNESS: Yes, they did.

24 BY MR. EDWARDS:

25 Q. That's something that ran consistent with

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2 BY MR. EDWARDS:

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

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

7 THE WITNESS: Correct.

8 BY MR. EDWARDS:

9 Q. All right.

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

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

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

16 BY MR. EDWARDS:

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

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

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. Did you find names of other witnesses and

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

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

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

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

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

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

16 BY MR. EDWARDS:

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

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

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

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

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2 BY MR. EDWARDS:

3 Q. In these messages, did you see messages
4 that were taken by Ghislane Maxwell or left for
5 Ghislane Maxwell?

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

8 THE WITNESS: I do recall seeing messages
9 utilizing her pad, her stationery.

10 BY MR. EDWARDS:

11 Q. Okay. Do you remember messages
12 specifically that Ms. Maxwell, she is home, or calls
13 for Ms. Maxwell, or indicating that the person
14 taking the message is GM? Do you remember those?

15 A. Yes.

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

18 BY MR. EDWARDS:

19 Q. And did that give you further reason to
20 want to speak to Ghislane Maxwell?

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

23 THE WITNESS: Correct. I wanted to speak
24 with everyone in the home and everyone
25 associated with Jeffrey Epstein.

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2 anything that's found that has any kind of
3 identifiers, any kind of names, phone numbers,
4 anything that could be used to identify further
5 victims and/or to corroborate what the information
6 we already obtained, that information would be kept.

7 Q. Okay.

8 A. Be followed up on.

9 Q. You testified earlier about certain pieces
10 of paper that had Ghislane Maxwell's name on it that
11 were obtained.

12 Are the documents that are listed, the
13 first one, two, three, four pages of Exhibit 8, some
14 of the documents that you're referring to?

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

17 THE WITNESS: That is correct.

18 BY MR. EDWARDS:

19 Q. And if we go through this stack of
20 documents, if you could just review them and tell me
21 if these are some of the items obtained through the
22 trash pulls at Jeffrey Epstein's home?

23 MR. PAGLIUCA: Object to form and
24 foundation.

25 THE WITNESS: That is correct. This is --

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2 these items were collected in the trash pull.

3 BY MR. EDWARDS:

4 Q. Okay. And these are items that you felt
5 had some evidentiary value?

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

8 THE WITNESS: Yes.

9 BY MR. EDWARDS:

10 Q. Were there other items within the trash
11 that were discarded as not having any apparent
12 evidentiary value?

13 A. Correct. There was stuff like food trash
14 we're not going to keep. You know, an apple core.
15 None of that's going to be kept.

16 Q. Okay. And when you took this stuff into
17 evidence, how was it maintained?

18 A. It was placed in a -- in a sealed
19 container, a sealed Ziploc, and placed into
20 evidence.

21 Q. And then was that file later transferred
22 to the State Attorney's Office or the FBI?

23 MR. PAGLIUCA: Object to form and
24 foundation.

25 THE WITNESS: It was collected by the FBI.

2

3

C E R T I F I C A T E

4

STATE OF FLORIDA)

: ss

5

COUNTY OF MIAMI-DADE)

6

7

8

9

I, KELLI ANN WILLIS, a Registered
Professional, Certified Realtime Reporter and
Notary Public within and for The State of
Florida, do hereby certify:

10

11

12

13

That JOSEPH RECAREY, the witness whose
deposition is hereinbefore set forth was duly
sworn by me and that such Deposition is a true
record of the testimony given by the witness.

14

15

16

17

I further certify that I am not related
to any of the parties to this action by blood
or marriage, and that I am in no way interested
in the outcome of this matter.

18

19

20

21

IN WITNESS WHEREOF, I have hereunto set
my hand this 24th day of June, 2016.

KELLI ANN WILLIS, RPR, CRR

22

23

24

25

EXHIBIT 14

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - X

****CONFIDENTIAL****

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

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2 even Nadia. And what I found very repulsive,
3 out of the ordinary, was Nadia was wearing a
4 swimsuit that was very revealing and
5 basically, her bottom basically went up her
6 butt, revealing all of her buttocks. So
7 again, in the context not very appropriate
8 for the situation.

9 Q. Could you tell the relationship of
10 age between the three girls that you have
11 described and Nadia, for instance?

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

14 A. Nadia seemed to be a bit older, I
15 would say.

16 Q. How does this end, or is there,
17 what do you do next? How does this meeting
18 that you've just described break up?

19 A. I asked to excuse myself and asked
20 where the bathroom was, so I'm pointed inside
21 the house, to go inside the house to the
22 bathroom.

23 I walk in there, and I walk, as I'm
24 walking to the bathroom, what caught my eye,
25 and I had to take a double lock, there were

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2 pictures of naked women, half-dressed girls.

3 So I went to the bathroom, again, from
4 someone, myself working in private service, I
5 always know in houses there are cameras, so
6 again, I was very reluctant to stare, because
7 you never know when you are on camera.

8 So I used the bathroom, and I came
9 out, and you know, curiosity got the best of
10 me, and I leaned over and started looking at
11 these pictures for a brief minute, and it was
12 just so coincidental that as I did that, Ms.
13 Maxwell enters, and she immediately says to
14 me that Jeffrey would like for me to rejoin
15 the party immediately.

16 Q. How many pictures of nude females
17 did you see in Jeffrey Epstein's home?

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

20 A. I can't recall the exact number.

21 Q. Can you describe the pictures that
22 you saw in terms of what the people, what the
23 people or person within the picture was
24 wearing, what the age range would be of the
25 person that's in the photograph, any poses,