

1 A Sorry.

2 Q You're still under oath, do you remember?

3 A Yes.

4 Q Okay. So you were referring a little bit to the
5 time that Ms. Roberts worked for Jeff?

6 A Yes.

7 Q You knew him as Jeff or Jeffrey?

8 A I remember Jeff. It could have been Jeffrey.

9 Q Okay. Tell me what you recall about Ms. Roberts
10 going to work for Jeff.

11 A I don't remember much of it, really. All I
12 remember is that she went to work for him. I know they
13 went to some island. I know they traveled around. And he
14 had a house in Palm Beach I think it was.

15 Q Did she tell you what she was doing for Jeff?

16 A At the beginning, it was massage. That's what I
17 was told.

18 Q By her?

19 A Yes.

20 Q Okay. Did she seem excited about that job?

21 A Yes.

22 Q Was she getting paid more money?

23 A Yes.

24 Q Do you know how much?

25 A No. A lot more.

1 Q So she hadn't come to you before that and said,
2 "Hey, I'm having to do something other than massages"?

3 A I don't remember.

4 Q She may have; she may not have?

5 A Yeah. I don't remember.

6 Q Well, why would you be fighting about it at the
7 end?

8 A Well, that's because she was messing with Tony,
9 the idiot.

10 Q So the fight --

11 A I mean, that's what he -- the fight's what
12 brought everything out.

13 Q Okay. So she was messing with Tony, the idiot,
14 and you guys got in a fight about her messing with Tony?

15 A I think that's what it originally it was.
16 Because she was supposed to come home, and I think she
17 went over there instead. That's when I found out --
18 that's when I found out about that, with the idiot. Then,
19 I believe the other stuff came to light. I don't really
20 remember.

21 Q As you sit here, you think that's when you were
22 finding out about all of this at the same time?

23 A I believe so, but I don't really remember.

24 Q Do you know where Tony lived?

25 A Somewhere around there, where our other

1 Q You had trouble figuring out what was the truth?

2 A Yeah. But I know for sure she was with the
3 idiot, so that's the main reason.

4 Q Well, you saw her with him, right?

5 A Well, I found out that she was in town, but not
6 here, and that's when I found out.

7 Q Okay. Not at home -- not at your home?

8 A Yeah.

9 Q When you believed yourself to be engaged?

10 A Yes.

11 Q Okay. She was not truthful with you about her
12 whereabouts?

13 MR. EDWARDS: Object to the form.

14 THE WITNESS: Yes.

15 BY MS. MENNINGER:

16 Q And you confirmed that in some fashion?

17 A Yes.

18 Q When another problem arose at the apartment, the
19 police were called, correct?

20 MR. EDWARDS: Form.

21 THE WITNESS: Other than that?

22 BY MS. MENNINGER:

23 Q With Mr. Perkins?

24 A I don't -- all I remember is that one time.

25 Q I just did a really bad question, so let me try

1 about being forced to do things --

2 A No. She might have told me some stuff, but
3 what, I don't remember really. Who knows if it was the
4 truth at the time anyway.

5 Q And you weren't doing drugs at that time?

6 A I wouldn't say no. I know at the end, I was
7 smoking a lot. And I might have been doing some other
8 stuff. I'm not sure.

9 Q Okay. Regardless, you would not have been
10 comfortable believing your fiancé was having sex with
11 other people?

12 A No.

13 Q Did she, Ms. Roberts ever tell you that she was
14 posing naked for photographs?

15 A No.

16 Q Would you have been okay with her posing naked
17 for photographs?

18 A No.

19 Q Did Ms. Roberts ever mention Ghislaine Maxwell,
20 my client?

21 A If she did, I don't remember the name. Like I
22 said, I only remember Jeff. That name is all I really
23 remember.

24 Q Because you don't remember Ms. Maxwell's name, I
25 assume you don't remember Ms. Roberts telling you that

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF MARION

I, Karla Layfield, RMR, Stenographic Court Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of James Michael Austrich; that said witness was duly sworn to testify truthfully; and that the foregoing pages, numbered 1 through 145, inclusive, constitute a true and correct record of the testimony given by said witness to the best of my ability.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor am I financially interested in the action.

WITNESS MY HAND this ___ day of June, 2016, at Ocala, Marion County, Florida.

Karla Layfield, RMR
Stenographic Court Reporter

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that James
5 Michael Austrich personally appeared before me and was
6 duly sworn on the 23rd day of June, 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this _____ day
8 of June, 2016.

9
10
11 _____
Karla Layfield, RMR
Notary Public
State of Florida at Large
My Commission No. FF942806
12 My Commission Expires 12/10/2019
13
14

15 _____ Personally Known
16 _____ Professionally Known
17 X Produced Identification of FDL
Exp. 07/9/80
18
19
20
21
22
23
24
25

EXHIBIT M

UNITED STATES DEPARTMENT OF STATE
APPLICATION FOR ☐ PASSPORT ☐ REGISTRATION
(Type or print all capital letters in blue or black ink in white areas only)

1. NAME (First and Middle)
NIRGINIA Lee

LAST
ROBERTS

2. MAIL PASSPORT TO: STREET / RD # OR P.O. BOX
[REDACTED] APT. #
[REDACTED] STATE
FL

ZIP CODE
33470

COUNTRY / IN CARE OF (if applicable)
USA

5. DATE OF BIRTH
JAN 12 2001

6. SOCIAL SECURITY NUMBER
[REDACTED] Personal Information

3. SEX
☐ M ☒ F

4. PLACE OF BIRTH (City & State or City & Country)
SACRAMENTO California

7. HEIGHT
5' 10"

8. HAIR COLOR
Blonde

9. EYE COLOR
Blue Green

11. BUSINESS OCCUPATION
[REDACTED]

12. PERMANENT ADDRESS (DO NOT LIST P.O. BOX)
[REDACTED] CITY
Lexington STATE
FL ZIP CODE
33470

14. FATHER'S FULL NAME (Last, First, Middle)
ROBERTS SKY BIRTHPLACE
California

15. MOTHER'S FULL MAIDEN NAME (Last, First, Middle)
Lyon BIRTHPLACE
California

16. HAVE YOU EVER BEEN MARRIED?
☐ Yes ☒ No

17. OTHER NAMES YOU HAVE USED
[REDACTED]

18. HAVE YOU EVER BEEN ISSUED A U.S. PASSPORT?
☐ Yes ☒ No

19. EMERGENCY CONTACT (If you wish, you may supply the name, address and telephone number of a person not traveling with you to be contacted in case of emergency.)
NAME
James Anselmi
[REDACTED]
TELEPHONE
[REDACTED] RELATIONSHIP
Father

20. TRAVEL PLANS (not mandatory)
Exp. Date
01/11/2011
Length of Trip
01/21/01
COUNTRIES TO BE VISITED
London
Khartoum

21. DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH.
I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" on the reverse of this application form. I solemnly swear or affirm that the statements made on this application are true and the photograph attached is a true likeness of me.

22. FOR ACCEPTANCE AGENT'S USE
Subscribed and sworn to (affirmed) before me
FOIA: (b)(6)
[Signature of person authorized to accept application]
23. APPLICANT'S IDENTIFYING DOCUMENTS
☒ DRIVER'S LICENSE
☐ PASSPORT
☐ OTHER (Specify)
ISSUE DATE
01/12/01
EXPIRATION DATE
01/12/05
PLACE OF ISSUE
FL
ISSUED IN THE NAME OF
Virginia Roberts

24. FOR ISSUING OFFICE USE ONLY (Applicant's evidence of citizenship)
☐ Birth Certificate
☐ Passport
☐ Report of Birth
☐ Naturalization/Citizenship Cert.
☐ Other
☐ Seen & Returned
☐ Attached
FOIA: (b)(6)

25. Fee
45 EXEC 25 ET 35 OTHER

EXHIBIT N

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE

May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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

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

BOIES, SCHILLER & FLEXNER LLP

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

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.

By Laura A. Menninger, Esq.

3 Jeffrey S. Pagliuca, Esq.

150 East 10th Avenue

4 Denver, CO 80203

Phone: 303.831.7364

5 lmenninger@hmflaw.com

jpagliuca@hmflaw.com

6 Appearing on behalf of the

Defendant

7
8 Also Present:

Brenda Rodriguez, Paralegal

9 Nicholas F. Borgia, CLVS Videographer

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

* * * * *
I N D E X

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PRODUCTION REQUEST(S):	
(None.)	

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1 January 19th, 2015?

2 A At the very top of the page it says
3 January 21st, 2015.

4 Q The date it was filed. Is there a date
5 just above the signature block?

6 A Oh, yes, sorry. Yes, there is.

7 Q And what date -- what date was that?

8 A The 19th day of January, 2015.

9 Q Okay. And this document is something that
10 you believe contains the truth, correct?

11 A To the best of my knowledge at the time,
12 yes.

13 Q All right. Did something change between
14 the time then and today that makes you believe that
15 it's not all accurate?

16 A Well, as you can see, in line 4 on page 1,
17 I wasn't aware of my dates. I was just doing the
18 best to guesstimate when I actually met them.

19 Since then I've been able to find out that
20 through my Mar-a-Lago records that it was actually
21 the summer of 2000, not the summer of 1999.

22 Q Oh, I'm sorry. Are you back on page 1?

23 A On the first page.

24 Q Okay.

25 A Yes.

1 Q And you're talking about line 4?

2 A Line 4.

3 Q Paragraph 4 or line 4?

4 A Oh, sorry. Number 4, the paragraph
5 number 4.

6 Q Okay. And what part of paragraph 4 do you
7 now believe to be untrue?

8 A In approximately --

9 MR. EDWARDS: Object to the form.

10 You can answer.

11 A In approximately 1999 when I was 15 years
12 old I met Ghislaine Maxwell.

13 Q (BY MS. MENNINGER) Okay.

14 A I now know that it was 2000, that I was 16
15 years old when I met Ghislaine Maxwell.

16 Q So when you signed this document under
17 penalty of perjury stating that it was true, you no
18 longer believe that to be true, correct?

19 A It was an honest mistake. We had no idea
20 how to pinpoint without any kind of records or dates
21 or anything like that. I was just going back
22 chronologically through time. And that's the best
23 time that I thought it was. And now I know the
24 facts, so it's good to know.

25 Q So you now believe that a document you

1 filed under oath is no longer true, correct?

2 MR. EDWARDS: Object to the form.

3 A I wouldn't say that it wasn't true. I was
4 just unaware of the times and the dates.

5 Q (BY MS. MENNINGER) Again, is there more
6 than one truth, Ms. Roberts?

7 A No, there's no more than one truth.

8 Q All right. So a document in which you
9 swore that you were 15 years old when you met
10 Ms. Ghislaine Maxwell is an untrue statement,
11 correct?

12 MR. EDWARDS: Object to the form.

13 A It's not that it's an untrue statement.
14 It was a mistake. So it wasn't intentionally trying
15 to say something that wasn't true. It was to my best
16 knowledge that I thought it was 1999. And when I got
17 my records from Mar-a-Lago I was able to find out
18 that it was 2000. And this was entered before I
19 found out the actual dates that I did work at
20 Mar-a-Lago.

21 Q (BY MS. MENNINGER) Okay. So a document
22 that you filed under oath --

23 A Um-hum.

24 Q -- is now, you believe to be untrue,
25 correct?

1 MR. EDWARDS: Objection. Asked and
2 answered.

3 Q (BY MS. MENNINGER) You may answer.

4 MR. EDWARDS: Answer again.

5 A Again, I wouldn't say it's untrue. Untrue
6 would mean that I would have lied. And I didn't lie.
7 This was my best knowledge at the time. And I did my
8 very best to try to pinpoint time periods going back
9 such a long time ago.

10 It wasn't until I found the facts that I
11 worked at Mar-a-Lago in 2000 that I was able to
12 figure that out.

13 Q (BY MS. MENNINGER) And approximately when
14 did you learn those facts about the dates you worked
15 at Mar-a-Lago?

16 A I would say it was mid-2015.

17 Q Mid-2015 is the first time you became
18 aware of the dates --

19 A I don't know the exact --

20 Q If you could just let me finish.

21 A I'm sorry.

22 Q That's all right. Approximately mid-2015
23 when you learned the true dates that you had worked
24 at Mar-a-Lago?

25 A That's correct. Sorry.

1 a lot of the circumstances that I had been subjected
2 to, I decided I wanted to get my GED.

3 Q Okay. So you were going to an actual
4 school to get your GED, that's what you're saying?

5 A Yes.

6 Q And that school, whatever it was, where
7 you were getting your GED was not Palm Beach High
8 School, right?

9 A No.

10 Q And it -- whatever the school was where
11 you were getting your GED took a summer break?

12 A I believe so, yes.

13 Q And that was in 2000?

14 A Now that we know the right dates, yes.

15 Q And that's when your dad helped you get a
16 quote-unquote summer job?

17 A Yes.

18 Q All right. And that summer job was
19 Mar-a-Lago?

20 A Yes.

21 Q Okay. Now tell me how you sort of came
22 into Mar-a-Lago for the first time? He asked you to
23 come? They called you? What happened?

24 A My dad was very liked there. So I think
25 he talked to the people who were in HR. And then

1 mic higher up on your jacket, please?

2 THE DEPONENT: Sure.

3 THE VIDEOGRAPHER: Thank you.

4 THE DEPONENT: Tell me if that's okay.

5 Better?

6 A Okay. Page 40?

7 Q (BY MS. MENNINGER) Right. Do you see the
8 first full paragraph on that page?

9 A I do.

10 Q The first line begins: I spent my sweet
11 16th birthday on his island in the Caribbean next to
12 Little (sic) St. James Isle. He liked to call it
13 Little St. Jeff's. His ego was enormous as his
14 appetite for fornicating.

15 Do you see that sentence?

16 A I do.

17 Q That is not true, correct? You were not
18 spending your sweet 16th birthday on Little St. James
19 Isle, correct?

20 A Based on my knowledge at the time that I
21 wrote this manuscript, I thought I did spend my 16th
22 birthday there. And so I put it down in there as
23 that. Now I know that it wasn't my 16th birthday.

24 Q Or your sweet 16th birthday?

25 A Well, we --

1 MR. EDWARDS: Object to the form.

2 Harassing.

3 Q (BY MS. MENNINGER) Was it your sweet 16th
4 birthday?

5 A Is it not custom to call your 16th
6 birthday sweet? Have you never heard that saying
7 before?

8 Q Was it your sweet 16th birthday,
9 Ms. Giuffre?

10 A As we --

11 MR. EDWARDS: She's answered the question.
12 It's been asked and answered.

13 MS. MENNINGER: She asked me a question,
14 actually. You're not testifying here.

15 Q (BY MS. MENNINGER) Was it your sweet 16th
16 birthday?

17 A As I thought, in the manuscript when I
18 wrote it, I thought it was my sweet 16th birthday.

19 Q Okay. Now that you know it wasn't, where
20 did you spend your sweet 16th birthday?

21 A Well, I don't know.

22 Q Well, just give us your best guess.

23 MR. EDWARDS: Objection. And she's not
24 going to guess today. She's going to tell you the
25 answers as she remembers them.

1 A Again, I don't know.

2 Q Do you recall any present you actually got
3 on your sweet 16th birthday?

4 A No, I don't. I don't know where I spent
5 it, who I spent it with or what I got. I'm sorry.

6 Q How long did you work at Mar-a-Lago?

7 A Best of my recollection, it was a summer
8 job. I believe I started in June. And I think I
9 only worked there approximately two weeks, two, three
10 weeks.

11 Q How many hours a week did you work?

12 A I want to say it was a -- I want to say
13 it's a full-time job.

14 Q Do you recall it being a full-time job?

15 A It was a summer job, but just thinking
16 back, my dad used to bring me in and bring me home.
17 So he worked full time, all day. So -- and I didn't
18 lounge around Mar-a-Lago so, yes, I think it would
19 have been a full-time job.

20 Q And how much did you make per hour?

21 A Approximately, I think I remember making
22 \$9 an hour.

23 Q The bracelet and earrings you got for your
24 birthday, some birthday, on Little -- or where was
25 that birthday party, at Little St. James?

1 Q Which brother?

2 A Sky.

3 Q What about your other brother?

4 A I think he had moved out by then.

5 Q What forms of communication did you have?

6 Just a home phone number, or what?

7 A Yeah, there was a home phone.

8 Q When do you recall ever getting a cell
9 phone?

10 A The first cell phone I ever got was the
11 one that Ghislaine gave to me.

12 Q So you never had -- your parents, did they
13 have ones when you were working at Mar-a-Lago?

14 A No, my dad used to -- like, we had phones
15 in the spa and maintenance area and so on, so forth.
16 And you could, so to speak, page people from around
17 the courts.

18 Q Okay. So tell me what you recall of the
19 first conversation that you had with Ghislaine
20 Maxwell.

21 A I'm sitting there reading my book about
22 massage therapy, as I'm working in the spa. And I'm
23 getting my GE -- well, I was in the process of
24 getting my GED before I went to my summer job. I
25 decided that I would like to become a massage

1 A Yes.

2 Q Who else was at home when you got home?

3 A My mom, my dad and my brother.

4 Q Which brother?

5 A Sky.

6 Q And anyone else who was there at the time?

7 A I believe Michael might have been living
8 with me at that time. So he might have been there.

9 Q Do you recall if he was there when you got
10 home?

11 A I don't really remember. I remember what
12 I did when I got home, that I basically made a
13 beeline for the bathroom.

14 Q Let me ask you a question. Michael was
15 living with you at that home, at your parents' home
16 at the time, is your best recollection today; is that
17 right?

18 A That's my best recollection, yes.

19 Q When you say living with you, were you
20 guys staying in the same room?

21 A Yes.

22 Q Were you engaged at that time to him?

23 A That was a really weird relationship. He
24 was a friend who looked after me, and he did propose
25 to me and I did say yes. But my heart was never in

1 it.

2 He was somebody that helped me off the
3 streets so I felt compelled to say yes to him.

4 Q Okay. So when he proposed to you and you
5 said yes, did that take place before you started
6 working at Mar-a-Lago or after you started working at
7 Mar-a-Lago?

8 A Before.

9 Q And so if he were living with your parents
10 at that time, you were living in the same room; is
11 that correct?

12 A I believe so.

13 Q And your parents understood him to be your
14 fiance?

15 A I don't think they agreed with it, but I
16 think they understood it as that. I mean --

17 Q I mean, you communicated to them that he
18 had proposed and you had accepted?

19 A Yeah, in not such a pretty way. I mean,
20 they obviously weren't very happy about it. And it
21 wasn't my true intentions to ever marry him.

22 Q Okay.

23 A But I did it to make him feel okay. I
24 didn't want to be mean.

25 Q What did your mom say about your

1 know where it was when she said to go do this.

2 Q (BY MS. MENNINGER) Okay. Where were you
3 sent to have sex with the owner of a large hotel
4 chain by Ghislaine Maxwell?

5 MR. EDWARDS: Object to the form.

6 A I believe that was one time in France.

7 Q (BY MS. MENNINGER) Which time in France?

8 A I believe it was around the same time that
9 Naomi Campbell had a birthday party.

10 Q Where did you have sex with the owner of a
11 large hotel chain in France around the time of Naomi
12 Campbell's birthday party?

13 A In his own cabana townhouse thing. It was
14 part of a hotel, but I wouldn't call it a hotel.

15 Jeffrey was staying there. Ghislaine was
16 staying there. Emmy was staying there. I was
17 staying there. This other guy was staying there. I
18 don't know his name.

19 I was instructed by Ghislaine to go and
20 give him an erotic massage.

21 Q She used the words erotic massage?

22 A No, that's my word. The word massage is
23 what they would use. That's their code word.

24 Q Was she in the room when you gave this
25 erotic massage to the owner of a large hotel chain?

1 A No, she was not in the room. She was in
2 another cabana.

3 Q And other than telling you to go give the
4 owner of this large hotel chain a massage, do you
5 remember any other words she used to you to direct
6 you in what you should do?

7 A Not at the time, no.

8 Q Where did -- where were you and where was
9 Ms. Maxwell when she directed you to go have sex with
10 Marvin Minsky?

11 MR. EDWARDS: Object to the form.

12 A I don't know.

13 Q (BY MS. MENNINGER) Where did you go to
14 have sex with Marvin Minsky?

15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.

18 Q And when was that?

19 A I don't know.

20 Q Do you have any time of year?

21 A No.

22 Q Do you know how old you were?

23 A No.

24 Q Other than Glenn Dubin, Stephen Kaufmann,
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

1 another prince, the large hotel chain owner and
2 Marvin Minsky, is there anyone else that Ghislaine
3 Maxwell directed you to go have sex with?

4 A I am definitely sure there is. But can I
5 remember everybody's name? No.

6 Q Okay. Can you remember anything else
7 about them?

8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.

13 Q Do you have any notes of all these people
14 that you were sent to?

15 A No, I don't.

16 Q Where are your notes?

17 A I burned them.

18 Q When did you burn them?

19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.

21 Q Did you have lawyers who were representing
22 you at the time you built a bonfire and burned these
23 notes?

24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.

4 Q So you burned notes of the men with whom
5 you had sex while you were represented by counsel in
6 litigation, correct?

7 MR. EDWARDS: Object to the form.

8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.

11 Q (BY MS. MENNINGER) When did you write
12 that journal?

13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.

16 Q So you did not write this journal at the
17 time it happened?

18 A No.

19 Q You started writing this journal
20 approximately a decade after you claim you finished
21 being sexually trafficked, correct?

22 A Yes.

23 Q And you started writing a journal after
24 you had a lawyer, correct?

25 A Correct.

1 Q Including Mr. Edwards, who is sitting
2 right here, correct?

3 A Correct.

4 Q What did that journal look like?

5 A It was green.

6 Q And what else?

7 A It was just a spiral notebook.

8 Q Okay. And what did you put into that
9 green spiral notebook?

10 A Bad memories. Things that I've gone
11 through, lots of things, you know. I can't tell you.
12 There was a lot of pages. It was over 300 pages in
13 that book.

14 Q Did you ever show that book to your
15 lawyers?

16 A No.

17 Q Did you show that book to anyone?

18 A My husband.

19 Q Did you show it to anyone else besides
20 your husband?

21 A No.

22 Q Did you tear out pages and give them to
23 Sharon Churcher?

24 A No, I wrote -- those pages that you're
25 talking about, I wrote for her specifically. She

1 wanted to know about the Prince Andrew incident.

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

3 A Yeah, that's just random paper.

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

8 Did I get that right?

9 A You got that right.

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

13 A At this time, no.

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

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

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

21 A Not in front of me, no.

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

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

1 other terms of his probationary period?

2 A No. He went to everything that he was
3 supposed to go to.

4 Q Has he paid his fines?

5 A Yes, as far as I know.

6 Q Describe for me the contract that you had
7 with the Mail On Sunday?

8 A Could you be a little bit more specific?
9 Like --

10 Q Have you had more than one contract with
11 the Mail On Sunday?

12 A Well, there was one contract for the
13 picture. And that was to pay me 140,000 for the
14 picture. And then two stories were printed after
15 that for the amount of 10,000 each.

16 Q Is that the only money that you received
17 from the Mail On Sunday?

18 A Correct.

19 Q Did you receive any money for syndication
20 of the photograph?

21 A Isn't that what the 140 was for?

22 Q I'm asking you.

23 A Well, I don't really know what syndication
24 means.

25 Q Did you have a written contract with the

1 Mail on Sunday?

2 A Yes.

3 Q Where is that contract right now?

4 A I don't know. I've moved that many times.

5 I -- I lose paperwork wherever I go.

6 Q Is it possible it's in the boxes in
7 Sydney?

8 A I don't think I kept it, to be honest.

9 Q Did you ever refer back to it after you
10 signed it?

11 A I know I kept it for a short while, but I
12 mean, like I said, I've moved countries twice in the
13 last two years and three different houses. So the
14 paper trail is lost. I don't know where it would be.

15 Q Did you receive it via e-mail?

16 A No. I received it -- Sharon Churcher
17 handed it to me by paper.

18 Q And you signed it?

19 A I signed it.

20 Q And then did you make a copy of it?

21 A No.

22 Q You never had a copy of it?

23 A Well, I had my own copy. I'm sure she has
24 hers.

25 Q Do you recall there being a period of

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
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202

EXHIBIT O

Page: 1 Document Name: untitled

PANEL: _____ A07. ASSIGNMENT HISTORY YEAR: 16
 T234 Monday May 23, 2016 9:04 am
 STDT: 12870606 ROBERTS, VIRGINIA L SCHL: 3390 GR: 10 ST: I

A	ENTRY	WITHDRAWAL P														E	
C	CD	DATE	OD	CD	DATE	R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	Y
—	R02	101201	—	W26	030702	N	—	02	01	—	3390	SURVIVORS	10	56	31	—	Y
—	R02	092001	—	W02	101101	N	—	02	01	—	2331	ROYAL PALM HIG	10	13	1	—	—
—	EA1	081401	—	W32	092001	Z	—	02	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	—
—	EA1	081600	—	W47	081301	Z	—	01	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y
—	EA1	062100	—	W47	081500	Z	—	00	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y
—	E01	081699	—	W03	081699	N	—	00	01	—	2331	ROYAL PALM HIG	10	—	—	—	—
—	E01	081998	—	W02	060999	P	—	99	01	—	0581	FOREST HILL HI	09	155	25	—	Y
—	E01	082097	—	W01	061098	R	—	98	01	—	2331	ROYAL PALM HIG	09	147	33	—	Y
—	E01	082097	—	W22	082097	N	—	98	01	—	2191	WELLINGTON HIG	09	—	—	—	—
—	R03	040797	—	W02	061197	P	—	97	01	—	1691	CRESTWOOD MID	08	40	5	—	Y
—	E01	082294	—	DNE	082294	N	—	95	01	—	1703	ROYAL PINES SC	06	—	—	—	—
—	E01	082393	—	W02	061094	P	—	94	01	—	1901	LOXAHATCHEE EL	05	167	13	—	Y
—	E01	082592	—	W01	061193	P	—	93	01	—	1901	LOXAHATCHEE EL	04	176	4	—	Y

PF1=HELP 3=EXIT 5=REFRESH 7=BKWD 8=FWD 9=NEXT PAGE 12=ESCAPE
 PAGE FULL...CONTINUE.

TERML: I1B5

TO - DISTRICT: 000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
SCHOOL: 3390 DEMOGRAPHIC INFORMATION FILE: SRTS121S
CURRENT DISTRICT: 50 PALM BEACH
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L.
MAILING ADDRESS: 12959 RACKLEY RD
DISTRICT: LOXAHATCHEE
DISTRICT STUDENT ID: 12870606 FL STUDENT ID-ALIAS: WEST PALM BEACH FL 33409
PARENT/GUARDIAN (NAME/CODE): SKY ROBERTS
PARENT: LYNNE ROBERTS
RACIAL/ETHNIC CATEGORY: W SEX: F
BIRTH VERIFICATION: 1
BIRTHPLACE: SACRAMENTO CA

IMMUNIZATION STATUS: PERMANENT IMMUNIZATION CERTIFICATE
VACCINE STATUS, DATE- DOSE DATE DOSE DATE DOSE DATE DOSE DATE
TYPE DOSE DATE DOSE DATE DOSE DATE DOSE DATE DOSE DATE DOSE DATE
DTP 1 11/02/1983 2 02/03/1984 3 04/27/1984 4 04/24/1987 5 09/27/1988
TD 1 06/24/1997
POLIO 1 11/02/1983 2 02/03/1984 3 04/24/1987 4 09/27/1988
HIB 1 04/24/1987
MMR 1 04/24/1987 2 04/18/1997
MEASLES 1 04/24/1987
HEP B 3DOSE 1 04/18/1997 2 06/24/1997 3 09/08/1999

COURSE INFORMATION
DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1989-1990 GRADE LEVEL: NA
DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
YEAR: 1991-1992 GRADE LEVEL: 03
T COURSE# COURSE TITLE SUBJECT CRSE CREDIT
3 5100090 THIRD GRADE AREA FLAG GRD ATT./EARN
CREDIT, TERM: 0.00 0.00
1991-1992 ANNUAL DAYS-PRESENT: 180 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1990-1991 GRADE LEVEL: NA
GPA QTY PTS
DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00
1990-1991 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED
DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
YEAR: 1992-1993 GRADE LEVEL: 04
T COURSE# COURSE TITLE SUBJECT CRSE CREDIT
3 5100100 FOURTH GRADE AREA FLAG GRD ATT./EARN
CREDIT, TERM: 0.00 0.00
1992-1993 ANNUAL DAYS-PRESENT: 176 ABSENT: 4
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA
APR 1 2008
E. Hatchett
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/11/2008
 SCHOOL: 3390 COURSE INFORMATION FILE: SRTS121S
 CURRENT DISTRICT: 50 PALM BEACH PAGE 2
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

DISTRICT: 50 SCHOOL: 1901 LOXNATCHEE GROVES ELEM. DISTRICT: 50 SCHOOL: 2331 ROYAL PALM BEACH COMM HIG
 YEAR: 1993-1994 GRADE LEVEL: 05 YEAR: 1997-1998 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	AREA FLAG	GRD	ATT./EARN	CREDIT	SUBJECT	CRSE	AREA FLAG	GRD	ATT./EARN	CREDIT
3	5100110	FIFTH GRADE	P	0.00	0.00	0.00	EL	RJ	P	0.50	0.00	0.50
3	5100110	FIFTH GRADE	P	0.00	0.00	0.00	EN	RJ	D	0.50	0.50	0.50
CREDIT, TERM: 0.00 0.00												

1993-1994 ANNUAL DAYS-PRESENT: 167 ABSENT: 13
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
 YEAR: 1994-1995 GRADE LEVEL: NA

DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00	GPA QTY PTS
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00	

1994-1995 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

DISTRICT: 50 SCHOOL: 1691 CRESTWOOD MIDDLE
 YEAR: 1996-1997 GRADE LEVEL: 08

T	COURSE#	COURSE TITLE	AREA FLAG	GRD	ATT./EARN	CREDIT	SUBJECT	CRSE	AREA FLAG	GRD	ATT./EARN	CREDIT
2	0400010	M/J DRAMA 2	A	0.00	0.00	0.00	MA	JR	B	0.50	0.50	0.50
2	8500240	TEEN CHALLENGES	C	0.00	0.00	0.00	SC	J	A	0.50	0.50	0.50
3	1001070	M/J LANG ARTS 3	C	0.00	0.00	0.00	EN	RJ	A	0.50	0.50	0.50
3	1205070	M/J MATH 3	D	0.00	0.00	0.00	PE	RJ	A	0.50	0.50	0.50
3	2002100	M/J COMPER SCI 3	C	0.00	0.00	0.00	SC	J	A	0.50	0.50	0.50
3	2103050	M/J FLOR:CHA AND CHO	C	0.00	0.00	0.00	EL	J	B	0.50	0.50	0.50
CREDIT, TERM: 0.00 0.00												

1996-1997 ANNUAL DAYS-PRESENT: 40 ABSENT: 5
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

OFFICIAL TRANSCRIPT
 THE SCHOOL DISTRICT OF
 PALM BEACH COUNTY, FLORIDA

APR 1 2008

E. Hatcher
 RECORDS CUSTODIAN

TO : DISTRICT: 000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 COURSE INFORMATION FILE: SETS121S
CURRENT DISTRICT: 50 PALM BEACH PAGE 3
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

DISTRICT: 50 SCHOOL: 0581 FOREST HILL HIGH
YEAR: 1998-1999 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	SUBJECT	AREA	FLAG	GRD	ATT./EARN	CREDIT
1	0500500	PERS, CAR, SCH DEV 1	EL				0.50 0.50	
1	0701320	FRENCH 1	FL	RJ			0.50 0.50	
1	1001340	ENG 2	EN	RJ			0.50 0.50	
1	1200380	ALGEBRA IB	MA	JR			0.50 0.00	
1	1900300	DRIVER ED CLASS	EL				0.50 0.50	
1	2000310	BIOLOGY 1	SC	RJ			0.50 0.50	
1	2109310	WORLD HIST	WH	RJ			0.50 0.00	
2	0500500	PERS, CAR, SCH DEV 1	EL				0.50 0.00	
2	0701320	FRENCH 1	FL	RJ			0.50 0.00	
2	0800300	HEALTH- LIF MGMT SKL	LM	RJ			0.50 0.00	
2	1001340	ENG 2	EN	RJ			0.50 0.00	
2	1200380	ALGEBRA IB	MA	JR			0.50 0.00	
2	2000310	BIOLOGY 1	SC	RJ			0.50 0.00	
2	2109310	WORLD HIST	WH	RJ			0.50 0.00	

CREDIT, TERM: 7.00 3.00

GPA QTY PTS
DISTRICT-TERM: 1.2857 9.00 CUM: 1.5714 22.00
STATE-TERM: 1.2857 9.00 CUM: 1.5714 22.00

1998-1999 ANNUAL DAYS-PRESENT: 155 ABSENT: 25
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1999-2000 GRADE LEVEL: NA

GPA QTY PTS
DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00

1999-2000 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 2000-2001 GRADE LEVEL: NA

GPA QTY PTS
DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00
2000-2001 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
YEAR: 2001-2002 GRADE LEVEL: 10

T	COURSE#	COURSE TITLE	SUBJECT	AREA	FLAG	GRD	ATT./EARN	CREDIT
1	0500530	PERS, CAR, SCH DEV 4	EL				0.50 0.50	
1	1001440	BUSINESS ENG 1	EN	J			0.50 0.50	
1	1205370	CONSUMER MATH	MA	C			0.50 0.50	
1	8300310	WORKPLACE ESSENTIALS VO	B				0.50 0.50	
1	8301610	WORK EXP 1	VO				0.50 0.00	
1	8301650	WORK EXP-OJT	VO				1.00 0.00	

CREDIT, TERM: 3.50 2.00

GPA QTY PTS
DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00

2001-2002 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA

APR 1 2008

L. Hatchett
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
SCHOOL: 3390 GRADUATION SUMMARY FILE: SRPS1218
CURRENT DISTRICT: 50 PALM BEACH PAGE 4
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L.
(561) 712-1800

***** C U M U L A T I V E S U M M A R Y *****
AS OF: 03/31/2008

* GRADUATION OPTION: 4-YR STANDARD *
* SUBJECT TOTAL CREDITS *
* AREA TO DATE NEEDED REMAINING *
* ENGLISH (EN) 2.00 4.00 2.00 *
* MATHEMATICS (MA) 1.50 3.00 1.50 *
* SCIENCE (SC) 1.50 3.00 1.50 *
* AMER HISTORY (AH) 0.00 1.00 1.00 *
* WORLD HISTORY (WH) 0.50 1.00 0.50 *
* ECONOMICS (EC) 0.00 0.50 0.50 *
* AMER GOVERNMENT (AG) 0.00 0.50 0.50 *
* VOCATIONAL/ (VO) 0.50 1.00* 0.50* *
* PERFORM FINE ART (PF) 0.00 0.50 0.50 *
* LIFE MGMT SKILLS (LM) 0.00 0.50 0.50 *
* PHYSICAL ED (PE) 0.50 0.50 0.00 *
* FOREIGN LANGUAGE (FL) 0.50 0.00 0.00 *
* LANGUAGE ARTS (LA) 0.00 0.00 0.00 *
* SOCIAL STUDIES (SS) 0.00 0.00 0.00 *
* ELECTIVE (EL) 2.00 9.00 6.50 *
* ESE (EX) 0.00 *
* COMPUTER ED (CE) 0.00 *
* CREDITS, CUMULATIVE: 9.00 24.00 15.00 *
* * TOTALS INCLUDE VOCATIONAL & PERFORM FINE ARTS *
* GPA QTY PTS GPA QTY PTS *
* DISTRICT: 1.5429 27.00 STATE: 1.5429 27.00 *

* CERTIFIED BY: *****
* SIGNATURE: *****
* DATE: *****

COMMUNITY SERVICE HOURS: 0 REQUIREMENT MET: N

DISTRICT CLASS RANK- EFFECTIVE DATE: 03/06/2002
CLASS RANK, NUMERICAL POSITION: 65
CLASS RANK, PERCENTILE: 70
CLASS RANK, TOTAL NUMBER IN CLASS: 214

DATE PASSED ASSESSMENT TEST FOR GRADUATION PURPOSES
COMMUNICATIONS: 10/2001
MATHEMATICS: 01/2002

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA
APR 1 2008
E. Hatchett
RECORDS CUSTODIAN

TC - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
 SCHOOL: 3390 COMMENTS FILE: SETSL21S
 CURRENT DISTRICT: 50 PALM BEACH PAGE 5
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
 LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

DEFINITION OF TERM CODES			
CODE DEFINITION	CODE DEFINITION	CODE DEFINITION	CODE DEFINITION
1 SEMESTER 1	S COMBINED SUMMER	E QUINTESTER 1	J SIX WEEKS 1
2 SEMESTER 2	SESSION	F QUINTESTER 2	K SIX WEEKS 2
3 ANNUAL	T INTERSESSION 1*	G QUINTESTER 3	L SIX WEEKS 3
4 SUMMER SESSION 1	U INTERSESSION 2*	H QUINTESTER 4	M SIX WEEKS 4
5 SUMMER SESSION 2	V INTERSESSION 3*	I QUINTESTER 5	N SIX WEEKS 5
K SHORT COURSE**	W INTERSESSION 4*	Y YEAR OF	O SIX WEEKS 6
	X INTERSESSION 5*	9 QUARTER 4	NONENROLLMENT***

* USED (INSTEAD OF SUMMER SCHOOL SESSIONS) WITH YEAR-ROUND SCHOOL RECORDKEEPING
 ** USED ONLY FOR WORKFORCE DEVELOPMENT EDUCATION (ADULT GENERAL AND POSTSECONDARY VOCATIONAL EDUCATION)
 *** USED ONLY FOR REPORTING STUDENTS WHO HAVE WITHDRAWN BETWEEN SCHOOL YEARS

STATE GRADING SCALE FOR HIGH SCHOOL STUDENTS (REGARDLESS OF ENTRY DATE) EFFECTIVE SCHOOL YEAR 1997-1998

GRADING SCALE, EFFECTIVE 07/01/2001			
GRADE EQUIVALENT	GRADE QUALITY	GRADE EQUIVALENT	GRADE QUALITY
A = 90 - 100	4.00	B = 80 - 89	3.00
D = 60 - 69	1.00	F = 0 - 59	0.00

GRADING SCALE, PRIOR TO 07/01/2001			
GRADE EQUIVALENT	GRADE QUALITY	GRADE EQUIVALENT	GRADE QUALITY
A = 94 - 100	4.00	B = 85 - 93	3.00
D = 70 - 76	1.00	F = 0 - 69	0.00

NOTE: FROM THE 1987-1988 THROUGH THE 1996-1997 SCHOOL YEARS, FOR STUDENTS ENTERING HIGH SCHOOL DURING THESE YEARS, THE GRADE EQUIVALENTS FOR C, D, AND F WERE:
 C = 75-84, D = 65-74, AND F = 0-64; QUALITY POINTS AND ALL OTHER GRADES WERE THE SAME AS THOSE SHOWN IN THE IMMEDIATELY PRECEDING STATE GRADING SCALE.

TO - DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
SCHOOL: 3390 COMMENTS FILE: SKT3121S
CURRENT DISTRICT: 50 PALM BEACH PAGE 6
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

----- STATE DEFINED COURSE FLAGS -----
R=ACADEMIC SCHOLAR-ELECTIVE 9=NINTH GRADER
G=GIPTED H=HONORS N=NO CREDIT
I=INCLUDE IN GPA X=EXCLUDE FROM GPA W=EXCLUDE FROM STATE GPA
P=COURSE IS IN PROGRESS S=CREDIT AWARDED BY SLEP EXAM T=TRANSFERRED COURSE

VOCATIONAL SUBSTITUTION COURSES-
\$=JOURNALISM SUB FOR PEAC ARTS 0=JROTC SUB FOR PRACTICAL ARTS
2=SUB FOR BUS EN I 1001440 3=SUB FOR BUS EN I 1001440/II 1001450 1=COMP ED SUB FOR PRACTICAL ARTS
5=SUB FOR MA I 1205380/II 1205390 6=SUB FOR GEN SCI 2002310 4=SUB FOR MA I 1205540
8=SUB FOR PRE ALGEBRA 1200300 A=JROTC CST GD SUB FOR SCIENCE 7=SUB FOR ANAT PHYSIO 2000350
K=JROTC NAVY SUB FOR SCIENCE O=JROTC ARMY SUB FOR LIFE MGMT F=JROTC AIR FC SUB FOR SCIENCE
@=SUB FOR BIO TECH 2000430 #=SUB FOR ENV SCI 2001340 Q=JROTC MARINE SUB FOR LIFE MGMT
*=SUBSTITUTE FOR COURSE SPECIFIED ON FOLLOWING LINE ON COURSE LIST %=SUB FOR PHY SCI 2001310

ELL INSTRUCTION-
M=HOME LANGUAGE INSTRUCTION B=HOME LANGUAGE &/OR ESOL INSTRUCTION (ELEMENTARY SELF-CONTAINED)
D=ESOL INSTRUCTION

----- FY 1991-1992 COMMENTS -----
THE PALM BEACH COUNTY SCHOOL DISTRICT AWARDS THE HIGH SCHOOL VALIDICTORIAN
AND SALUTATORIAN USING A WEIGHTED GPA AVERAGE THAT IS BASED ON COURSES TAKEN
IN GRADES 9 - 12. HOWEVER, THE DISTRICT GPA INCLUDES ALL CREDIT COURSES.

TO - DISTRICT: 0000050 PALM BEACH
 GRADE: 10
 SCHOOL: 3390 CATEGORY B INFORMATION FILE: SKTS121S
 CURRENT DISTRICT: 50 PALM BEACH PAGE 7
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

WITHDRAWAL-DATE: 03/07/2002 CODE: W26

HOME LANGUAGE SURVEY DATE: 06/15/2000

NATIVE LANGUAGE: EN ENGLISH

COUNTRY OF BIRTH: US UNITED STATES
 PRIMARY HOME LANGUAGE: EN ENGLISH

HEALTH EXAMINATION, SCHOOL ENTRY: Y SCHOOL ENTRY HEALTH EXAMINATION CERTIFIED.

STUDENT PLAN DATE: 05/11/1999 CURRENT EVALUATION/RE-EVALUATION DATE: 05/11/2002
 PRIMARY EXCEPTIONALITY: Z
 FEPP PROGRAM:

----- EXCEPTIONAL STUDENT PROGRAM INFORMATION -----
 EVALUATION COMPLETE DATE 05/11/99 05/11/99 05/11/99 05/11/99 05/11/99
 REFERRAL DATE 05/10/99 05/11/99 05/11/99 05/11/99 05/11/99
 PLACEMENT STATUS ELIGIBLE AND PLACED ELIGIBLE AND PLACED
 EXCEPTIONALITY HOSPITAL/HOMEBOUND HOSPITAL/HOMEBOUND

----- DROPOUT PREVENTION PROGRAM INFORMATION -----
 PLACEMENT REASONS OUTCOMES
 EDUCATIONAL ALTERNATIVE PROGRAMS ACADEMICALLY UNSUCCESSFUL DOCUMENTD IMPROV ACADMC PERFORMANCE
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----- TEST INFORMATION -----
 TEST NAME LEVEL SUBJECT SCORE SCORE SUBJECT SCORE SCORE
 GRD DATE TEST NAME FORM CONTENT TYPE TYPE CONTENT TYPE TYPE
 30 06/16/2000 TAB 7 A TOTBAT GE 0000 MATH(T) GE 0000 READ(T) GE 0000
 LANGUAGE GE 0110
 30 06/15/2000 TAB 7 A TOTBAT GE 0000 MATH(T) GE 0000 READ(T) GE 0126
 LANGUAGE GE 0000
 30 06/15/2000 TAB 7 M TOTBAT GE 0000 MATH(T) GE 0073 READ(T) GE 0000
 LANGUAGE GE 0000
 09 04/20/1998 CTB A 19 COMPREHE SS 0801 COMPREHE NP 0065 PROB/SLV SS 0759
 SS/ENVIR NP 0034 SCIENCE SS 0000 SCIENCE NP 0000
 SS/ENVIR SS 0000

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
 SCHOOL: 3390 TEST INFORMATION
 CURRENT DISTRICT: 50 PALM BEACH
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

FILE: SPTS121S
 PAGE 8 OF 8

LEGAL NAME: ROBERTS, VIRGINIA L
 (561) 712-1800

TEST GRD DATE	TEST NAME	LEVEL FORM	SUBJECT CONTENT	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE
08 04/15/1997	CTB	B 17	READ(T)	SS 0000	READ(T)	NP 0000	COMPREH SS 0780	NP 0000	MATH(T)	SS 0000
			MATH(T)	NP 0000	COMPREH SS 0780	NP 0000	COMPREH NP 0077	SS 0000	VOCAB	SS 0000
			COMPUTAT	SS 0000	COMPUTAT NP 0000					
08 04/15/1997	CTB	B 17	VOCAB	NP 0000	PROB/SLV SS 0788		PROB/SLV NP 0070			
05 04/22/1994	CTB	B 15	COMPREH	SS 0708	COMPREH NP 0032		PROB/SLV SS 0667			
			PROB/SLV	NP 0010	LANGUAGE SS 0694		LANGUAGE NP 0026			
			CAP/MECH	SS 0646	CAP/MECH NP 0008		USAGE/EX SS 0742			
05 04/22/1994	CTB	B 15	USAGE/EX	NP 0061						
04 03/29/1993	CTB	A 14	READ(T)	SS 0711	READ(T)	NP 0059	MATH(T)	SS 0668		
			MATH(T)	NP 0022	COMPREH SS 0735		COMPREH NP 0074			
			COMPUTAT	SS 0667	COMPUTAT NP 0021		VOCAB	SS 0685		
04 03/29/1993	CTB	A 14	VOCAB	NP 0043	PROB/SLV SS 0669		PROB/SLV NP 0024			
			SCIENCE	SS 0707	SCIENCE NP 0049		SS/ENVIR SS 0692			
			SS/ENVIR	NP 0034						
04 02/10/1993	WAP	04	WR NARRA	SS 0000	WR EXPOS SS 0000		WRITING	SS 0000		
03 04/08/1992	CTB	A 13	COMPREH	SS 0733	COMPREH NP 0085		PROB/SLV SS 0649			
			PROB/SLV	NP 0026	LANGUAGE SS 0696		LANGUAGE NP 0050			
			CAP/MECH	SS 0679	CAP/MECH NP 0044		USAGE/EX SS 0712			
03 04/08/1992	CTB	A 13	USAGE/EX	NP 0056						
02 04/16/1991	CTB	A 12	READ(T)	SS 0663	READ(T)	NP 0060	MATH(T)	SS 0467		
			MATH(T)	NP 0001	COMPREH SS 0659		COMPREH NP 0051			
			COMPUTAT	SS 0337	COMPUTAT NP 0001		VOCAB	SS 0667		
02 04/16/1991	CTB	A 12	VOCAB	NP 0070	PROB/SLV SS 0597		PROB/SLV NP 0025			

***** END OF TRANSCRIPT *****

EXHIBIT P

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,
Plaintiff,

v.

GHISLAINE MAXWELL,
Defendant.

_____/

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company
B. Paul Katz Professional Center
(SunTrust Building)
One Florida Park Drive South
Suite 214
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR
Florida Professional Reporter
Court Reporter and Notary Public

APPEARANCE OF COUNSEL

ON BEHALF OF THE PLAINTIFF:

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ON BEHALF OF THE DEFENDANT:

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Also appearing: Jenny Martin, Videographer from Abel
Virginia Giuffre, Plaintiff

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STIPULATION

It is hereby stipulated and agreed by and
between counsel present at this deposition and by
the deponent that the witness review of this
deposition would be waived.

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- - -

(MARKED BY THE PLAINTIFF:)

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