

ROSS NEIL SUTHERLAND GOW 11/18/2016

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1 single person we reached out to. 10:01:13

2 Q. Okay. So is it your testimony that you reached 10:01:19  
3 out to individuals who did not first contact you? 10:01:22

4 A. No. We were in response mode. 10:01:26

5 Q. Okay. 10:01:28

6 A. There was enough to do responding to incoming 10:01:29  
7 queries, I wouldn't have been making more work, to be 10:01:33  
8 honest. 10:01:38

9 Q. Alright. 10:01:38

10 MR. DYER: So journalists paid no attention to 10:01:42  
11 your "No further communication will be provided on the 10:01:44  
12 matter." 10:01:47

13 A. No -- that's quite correct, sir, and there 10:01:48  
14 probably was a -- it's regarded as tweaking their tales. 10:01:50

15 BY MS. SCHULTZ: 10:02:00

16 Q. Mr. Gow, I'm handing you what I've marked as 10:02:00  
17 Exhibit 14. The Bates number is RG(UK) 000004. I'll 10:02:04  
18 give you a moment to look at it. 10:02:17

19 (Exhibit 14 was marked for identification.) 10:02:19

20 BY MS. SCHULTZ: 10:02:43

21 Q. Thank you. Toward the top of the page there is 10:02:44  
22 a passage that reads: 10:02:47

23 "Apologies, should read 10:02:49

24 Virginia Roberts all the way 10:02:51

25 through." [As read] 10:02:53

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1 servicing ultra high net worth clients, individuals, 11:23:14  
2 corporates, governments and NGOs, managing their media 11:23:20  
3 relations and protecting their reputation. 11:23:25

4 Q. Approximately how long have you been providing 11:23:27  
5 such services? 11:23:30

6 A. Acuity was set up in 2010. 11:23:31

7 (Exhibit 26 was marked for identification.) 11:23:42

8 BY MS. SCHULTZ:

9 Q. I'm going to hand you what I've marked as 11:23:37  
10 Exhibit 26. 11:23:39

11 A. Thank you. 11:23:43

12 Q. Does this document fairly depict pages from 11:23:53  
13 your -- from Acuity Reputation's website? 11:23:55

14 A. It does. 11:23:59

15 Q. Do you see where it says "We manage reputation 11:24:02  
16 and forge opinion through public relations, strategic 11:24:06  
17 communications and high level networking"? 11:24:10

18 A. I do. 11:24:13

19 Q. Is that a true statement? 11:24:13

20 A. Say it again. Sorry. 11:24:15

21 Q. Is that a true statement? 11:24:17

22 A. It is, yes. I wrote that statement. 11:24:18

23 MR. DYER: Sorry, you read it or you wrote it? 11:24:20

24 THE WITNESS: I wrote it, so I do recognize it. 11:24:22

25 BY MS. SCHULTZ: 11:24:28

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1 Q. Is it correct that public relations and 11:24:29  
2 strategic communications are things that you personally 11:24:31  
3 do as part of your professional activities? 11:24:36

4 A. I personally -- I'm involved in public 11:24:40  
5 relations and strategic communications, yes. 11:24:44

6 Q. Is it correct that the media is the intended 11:24:48  
7 recipient of this strategic communications. 11:24:51

8 A. It's -- the -- it's a larger ground than just 11:24:55  
9 the media. There may be lobbyists, government think 11:24:59  
10 tanks, focus groups, government departments. 11:25:05

11 Q. Would it be fair to say that the media is often 11:25:09  
12 the intended recipient of strategic communications? 11:25:12

13 A. It is a frequent recipient. 11:25:16

14 Q. Referent recipient? 11:25:18

15 A. But not the sole recipient. 11:25:21

16 Q. Okay. Do you see where your website claims 11:25:23  
17 that your company has "excellent relationships with the 11:25:25  
18 media"? 11:25:28

19 A. I do. 11:25:30

20 Q. Is that a true statement? 11:25:31

21 A. That is true, yeah. 11:25:33

22 MR. DYER: Except Mr. Syson. 11:25:37

23 THE WITNESS: Except Mr. Syson, sir. 11:25:38

24 MS. SCHULTZ: Of course. 11:25:40

25 THE WITNESS: And representatives of the Daily 11:25:40

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1 Mirror. 11:25:41

2 BY MS. SCHULTZ: 11:25:42

3 Q. Is it correct that you advertise your 11:25:42

4 "excellent relationships with the media" because your 11:25:46

5 services often include giving communications to the media 11:25:49

6 on behalf of your clients? 11:25:52

7 A. Yes. 11:25:55

8 MS. SCHULTZ: That's all I have for right now. 11:25:59

9 MR. DYER: I just wanted to ask you one 11:26:01

10 question about Exhibit 25. This was the email from the 11:26:03

11 New York Daily News to you which you sent on to 11:26:13

12 Ms. Maxwell and Mr. Barden. 11:26:17

13 THE WITNESS: Yes. 11:26:20

14 MR. DYER: Do you recollect whether you were 11:26:29

15 asked to make any statement in response to this matter, 11:26:30

16 the issue of proceedings in September of last year? 11:26:35

17 THE WITNESS: I don't, sir. It's always been 11:26:40

18 the case that Mr. Barden and I were encouraging 11:26:45

19 Ms. Maxwell to make a statement, but she was very 11:26:50

20 reluctant to do so. 11:26:57

21 MR. DYER: Right. I think you've got him to 11:27:00

22 accept that up until some time March, April, May, he may 11:27:02

23 have spoken to Mr. Syson. And that was the last 11:27:06

24 statement that there's any evidence of him making about 11:27:10

25 this matter. But on the evidence, as I understand it, 11:27:14

ROSS NEIL SUTHERLAND GOW 11/18/2016

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## 1 CERTIFICATE OF COURT REPORTER

2

3 I, Lisa M. Barrett, an Accredited Real-time Reporter,  
 4 hereby certify that the testimony of the witness Ross  
 5 Neil Sutherland Gow in the foregoing transcript,  
 6 numbered pages 1 through 122, taken on this 18th day  
 7 of November, 2016 was recorded by me in machine  
 8 shorthand and was thereafter transcribed by me; and  
 9 that the foregoing transcript is a true and accurate  
 10 verbatim record of the said testimony.

11

12

13 I further certify that I am not a relative, employee,  
 14 counsel or financially involved with any of the  
 15 parties to the within cause, nor am I an employee or  
 16 relative of any counsel for the parties, nor am I, in  
 17 any way, interested in the outcome of the within  
 18 cause.

19

20

21 Signed: .....

22 Name: Lisa M. Barrett, RPR, CRR, CRC, CSR

23 Date: .....

24

25

# EXHIBIT 7

(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 20, 2016

9:12 a.m.

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

Deposition of [REDACTED] pursuant  
to notice, taken by Plaintiff, at the  
offices of Podhurst Orseck, 25 West  
Flagler Street, Suite 800, Miami, Florida,  
before Kelli Ann Willis, a Registered  
Professional Reporter, Certified Realtime  
Reporter and Notary Public within and  
for the State of Florida.

1 [REDACTED] - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. When you got to his house, you were  
4 requested to give a massage?

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

7 THE WITNESS: I don't exactly remember. I  
8 don't remember if I was asked in the kitchen.  
9 I don't remember if -- I don't remember.

10 BY MR. EDWARDS:

11 Q. Massage was part of the game, though?

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

14 THE WITNESS: I don't remember. I'm  
15 sorry.

16 BY MR. EDWARDS:

17 Q. But even during this deposition today, we  
18 have described at times you giving him a massage?

19 A. Yes. You're asking about my first  
20 encounter, though.

21 Q. Sorry, I'm just trying to sum up the whole  
22 thing.

23 A. Okay.

24 Q. Was massage part of the lure to get you  
25 specifically to his house?



1 [REDACTED] - CONFIDENTIAL

2 A. Yes.

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

5 BY MR. EDWARDS:

6 Q. And at the time, you are 15, 16 or 17  
7 years old?

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

10 THE WITNESS: Yes.

11 BY MR. EDWARDS:

12 Q. No massage experience?

13 A. No.

14 Q. You were told to bring other girls to his  
15 house?

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

18 THE WITNESS: After a while, yes.

19 BY MR. EDWARDS:

20 Q. These massages were turned sexual by  
21 Jeffrey, as opposed to by anyone else?

22 A. Jeffrey took my clothes off without my  
23 consent the first time I met him.

24 Q. The massages were scheduled by people  
25 working for Jeffrey?

1 [REDACTED] - CONFIDENTIAL

2 A. I don't recall.

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

5 BY MR. EDWARDS:

6 Q. Jeffrey Epstein, during these massages,  
7 would use sex toys or have sex toys used?

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

10 THE WITNESS: Well, at that point, it's no  
11 longer a massage. Something else is going on.  
12 But, yes, he would take out adult toys and  
13 different things.

14 BY MR. EDWARDS:

15 Q. While you were a teenager, Jeffrey Epstein  
16 asked you to live with him?

17 A. Yes. He wanted me to be emancipated.

18 Q. Jeffrey Epstein encouraged girl-on-girl  
19 sex?

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

22 THE WITNESS: Yes.

23 BY MR. EDWARDS:

24 Q. And after you cooperated with the police,  
25 you were intimidated by people working for Jeffrey

1 [REDACTED] - CONFIDENTIAL

2 Epstein?

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

5 THE WITNESS: Yes.

6 MR. EDWARDS: All right. I don't have  
7 anything further for you. I apologize that we  
8 even had to go through this, all right?

9 THE WITNESS: Okay.

10 E X A M I N A T I O N

11 BY MR. PAGLIUCA:

12 Q. Ms. [REDACTED], by name is Jeff Pagluica. I  
13 live in Denver, Colorado. And, like you, I don't  
14 want to be here today either, okay? I would rather  
15 be in Denver.

16 I just want to -- as I understand it, and  
17 I'm not trying to get into any of your treatment  
18 over the last, let's say, 10 years, because I don't  
19 know how long it's been, but as I understand what  
20 you and your lawyer have said here today, you have  
21 been involved in some number of years of therapy, in  
22 which the purpose -- part of the purpose of the  
23 therapy has been to forget all of these events that  
24 Mr. Edwards was asking you questions about; is that  
25 correct?

KELLI ANN WILLIS, RPR, CRR

# EXHIBIT 8

(Filed Under Seal)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,  
Plaintiff,

v.

CASE NO.:15-CV-07433-RWS

GHISLAINE MAXWELL,

Defendants.

---

January 25, 2017

9:05 a.m. - 12:44 p.m.

401 E. Las Olas Boulevard

Fort Lauderdale, Florida

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

VIDEOTAPE DEPOSITION OF SARAH KELLEN

Taken on behalf of the before  
Michael J. D'Amato, RMR, Notary Public in and for the  
State of Florida at Large, pursuant to Notice of Taking  
Deposition in the above cause.

Job # 293966

1 decline to answer.

2 Q. Who introduced you to Ghislaine Maxwell?

3 A. On advice of my counsel I must invoke my Fifth  
4 and Sixth Amendment privilege which I understand  
5 protect the innocent and therefore I must unfortunately  
6 decline to answer.

7 Q. When you met Ghislaine Maxwell was she working  
8 for Jeffrey Epstein?

9 A. On advice of my counsel I must invoke my Fifth  
10 and Sixth Amendment privilege which I understand  
11 protect the innocent and therefore I must unfortunately  
12 decline to answer.

13 Q. Did Ghislaine Maxwell work as a recruiter for  
14 young girls for Jeffrey Epstein when you met her?

15 A. On advice of my counsel I must invoke my Fifth  
16 and Sixth Amendment privilege which I understand  
17 protect the innocent and therefore I must unfortunately  
18 decline to answer.

19 Q. I'm defining young girls to mean females the  
20 ages 12 to 23. Do you understand that?

21 A. On advice of my counsel I must invoke my Fifth  
22 and Sixth Amendment privilege which I understand  
23 protect the innocent and therefore I must unfortunately  
24 decline to answer.

25 Q. Didn't Ghislaine Maxwell approach you to

1 girls for sex with Jeffrey Epstein?

2 A. On advice of my counsel I must invoke my Fifth  
3 and Sixth Amendment privilege which I understand  
4 protect the innocent and therefore I must unfortunately  
5 decline to answer.

6 Q. Did you assist Ghislaine Maxwell in procuring  
7 underage girls for sex with Jeffrey Epstein?

8 A. On advice of my counsel I must invoke my Fifth  
9 and Sixth Amendment privilege which I understand  
10 protect the innocent and therefore I must unfortunately  
11 decline to answer.

12 Q. Isn't it true that Ghislaine Maxwell would  
13 recruit underage girls for sex and sex acts with  
14 Jeffrey Epstein?

15 A. On advice of my counsel I must invoke my Fifth  
16 and Sixth Amendment privilege which I understand  
17 protect the innocent and therefore I must unfortunately  
18 decline to answer.

19 Q. Did Ghislaine Maxwell give you information on  
20 what underage girls she had contact information for?

21 A. On advice of my counsel I must invoke my Fifth  
22 and Sixth Amendment privilege which I understand  
23 protect the innocent and therefore I must unfortunately  
24 decline to answer.

25 Q. Did Ghislaine Maxwell teach you to offer these



1 CERTIFICATE OF COURT REPORTER

2 I, MICHAEL J. D'AMATO, a Registered Merit Reporter  
3 and Notary Public in and for the State of Florida at  
4 Large, do HEREBY CERTIFY that I was authorized to and  
5 did stenographically report the deposition of SARAH  
6 KELLEN; that a review of the transcript was requested;  
7 and that the foregoing transcript, pages from 1 to 197,  
8 is a true and accurate record of my stenographic notes.

9 I FURTHER CERTIFY that I am not a relative,  
10 employee, attorney, or counsel of any of the parties, nor  
11 am I a relative or employee of any of the parties'  
12 attorney or counsel connected with the action, nor am I  
13 financially interested in the action.

14 Dated this 27th day of January 2017.

15 \_\_\_\_\_  
16 MICHAEL J. D'AMATO,  
17 Registered Merit Reporter  
18  
19  
20  
21  
22  
23  
24  
25

# EXHIBIT 9

(Filed Under Seal)

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

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VIDEOTAPE DEPOSITION OF: PETER KENT  
November 29, 2016

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

---

PURSUANT TO SUBPOENA AND NOTICE, the videotape deposition of PETER KENT was taken on behalf of the Plaintiff at 150 East 10th Avenue, Denver, Colorado 80230, on November 29, 2016, at 9:00 a.m., before Sandra L. Bray, Registered Diplomate Reporter, Certified Realtime Reporter, and Notary Public within Colorado.

MAGNA LEGAL SERVICES  
(866) 624-6221



1 MS. McCAWLEY: I'm just asking about his  
2 retention, which I believe is discoverable under  
3 Rule 26.

4 Q. (BY MS. McCAWLEY) Do you recall whether  
5 you were retained to perform work for one expert or  
6 two experts?

7 THE DEPONENT: Am I allowed to answer  
8 this?

9 MR. PAGLIUCA: Yes.

10 A. I actually don't recall.

11 Q. (BY MS. McCAWLEY) Do you know whether  
12 you were provided with one report or two reports when  
13 you initially were retained?

14 A. I believe I was provided with both the  
15 reports at the same time.

16 Q. Let me turn to about halfway back. So  
17 it's going to be -- there's markings on the bottom.  
18 It says PK-005.

19 A. Yes.

20 Q. And it indicates an amount there, an  
21 invoice. Is this one of your invoices?

22 A. Yes.

23 Q. It indicates an amount of \$17,875?

24 A. Yes.

25 Q. Is that the total amount you've been

1 paid, with the exception of what we paid you for your  
2 testimony here today, in this matter?

3 A. I think so. What date was this?

4 Q. It looks like it's dated October 29th,  
5 2016.

6 A. Oh, yes. In that case, yes.

7 Q. Have you performed any work after that  
8 date that you've been paid for?

9 A. Only in preparation for this deposition.

10 Q. Have you been paid for that work?

11 A. No.

12 Q. No. Have you invoiced that work yet?

13 A. No.

14 Q. All right. And then I'm going to turn  
15 you to the next page -- please don't put it away  
16 yet -- which appear to be invoices.

17 A. Time sheets.

18 Q. Time sheets? You tell me.

19 A. It's a time sheet.

20 Q. Is this typically how you record your  
21 time when you're doing expert work?

22 A. Yes.

23 Q. And this indicates -- the first entry is  
24 on 9/28/2016. Is that when you commenced work on this  
25 matter?

## REPORTER'S CERTIFICATE

STATE OF COLORADO )  
 ) ss.  
CITY AND COUNTY OF DENVER )

I, SANDRA L. BRAY, Registered Diplomat  
Reporter, Certified Realtime Reporter, and Notary  
Public ID 20084001729, State of Colorado, do hereby  
certify that previous to the commencement of the  
examination, the said PETER KENT was duly sworn by me  
to testify to the truth in relations to the matters in  
controversy between the parties hereto; that the said  
deposition was taken in machine shorthand by me at the  
time and place aforesaid and was thereafter reduced to  
typewritten form; that the foregoing is a true  
transcript of the questions asked, testimony given,  
and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my  
signature this 8th of December, 2016.

My commission expires January 16, 2020.

X Reading and Signing was requested.

Reading and Signing was waived.

Reading and Signing is not required.

# EXHIBIT 10

(Filed Under Seal)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,  
Plaintiff,

Case No.: 15-cv-07433-RWS

-against-

GHISLAINE MAXWELL,  
Defendant.

- - - - - x

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

Videotaped oral deposition of NADIA  
MARCINKO, taken pursuant to notice, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, LLP, 575 Lexington  
Avenue, New York, New York commencing  
January 17, 2017, 1:04 p.m., 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



1 N. Marcinko - Confidential

2 reside, a dwelling that is paid for by either  
3 Jeffrey Epstein or Ghislaine Maxwell?

4 A. Same answer.

5 Q. Do you know Jeffrey Epstein?

6 A. Same answer.

7 Q. Do you know Ghislaine Maxwell?

8 A. Same answer.

9 Q. How old were you when you met  
10 either Jeffrey Epstein or Ghislaine Maxwell?

11 A. Same answer.

12 Q. Who introduced to you Ghislaine  
13 Maxwell?

14 A. Same answer.

15 Q. When you met Ghislaine Maxwell, was  
16 she working for Jeffrey Epstein?

17 A. Same answer.

18 Q. Did Ghislaine Maxwell work as a  
19 recruiter of young girls for Jeffrey Epstein  
20 when you met her?

21 A. Same answer.

22 Q. Did Ghislaine Maxwell instruct you  
23 to recruit young girls for Jeffrey Epstein?

24 A. Same answer.

25 Q. Did Ghislaine Maxwell encourage

1 N. Marcinko - Confidential

2 Ghislaine Maxwell?

3 A. Same answer.

4 Q. Have you observed Ghislaine Maxwell  
5 and Jeffrey Epstein offering these young  
6 girls money, education or other things of  
7 value during the massage to get that young  
8 girl to return to Jeffrey Epstein for sexual  
9 purposes?

10 A. Same answer.

11 Q. Have you observed Ghislaine Maxwell  
12 and Jeffrey Epstein convert what started as a  
13 massage with these young girls into something  
14 sexual?

15 A. Same answer.

16 Q. Have you understood when I talk  
17 about young girls, I'm talking about girls  
18 between the age range of 13 and 23 years old?

19 A. Same answer.

20 Q. Have you observed that when  
21 Ghislaine Maxwell and Jeffrey Epstein used  
22 the term, massage, it always includes sex?

23 A. Same answer.

24 Q. Was massage a word used by  
25 Ghislaine Maxwell to lure girls into sex with

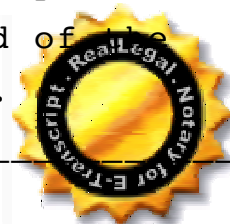
CERTIFICATE

I HEREBY CERTIFY that the witness,  
NADIA MARCINKO, 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: January 17, 2017



(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 11

## (Filed Under Seal)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

**\*\*CONFIDENTIAL\*\***

Videotaped deposition of GHISLAINE  
MAXWELL, taken pursuant to subpoena, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, 575 Lexington  
Avenue, New York, New York, commencing  
April 22, 2016, 9:04 a.m., on the above  
date, before Leslie Fagin, a Court  
Reporter and Notary Public in the State  
of New York.

- - -

MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026

1 G Maxwell - Confidential

2 Q. I'm not talking about friends. I'm  
3 talking about individuals --

4 MR. PAGLIUCA: I'm going to object  
5 to you interrupting the witness who was  
6 answering your question. The question  
7 was, have you ever seen anyone, female  
8 under the age of 18 at the house and  
9 that's the question she was answering.  
10 If you want to strike that question and  
11 ask another question, feel free, but let  
12 the witness respond, please.

13 MS. MCCAWLEY: I will do that.

14 Q. Have you ever observed a female  
15 under the age of 18 at Jeffrey Epstein's home  
16 that was not a friend, a child -- one of your  
17 friend's children?

18 A. Again, I can't testify to that  
19 because I have no idea what you are talking  
20 about.

21 Q. You have no idea what I'm talking  
22 about in the sense you never observed a  
23 female under the age of 18 at Jeffrey  
24 Epstein's home that was not one of your  
25 friend's children, is that correct?

1 G Maxwell - Confidential

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

4 A. How would I possibly know how  
5 someone is when they are at his house. You  
6 are asking me to do that. I cannot possibly  
7 testify to that. As far as I'm concerned,  
8 everyone who came to his house was an adult  
9 professional person.

10 Q. Are you familiar with the police  
11 report that was issued in respect to the  
12 investigation in this matter?

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

15 Q. Are you familiar with the police  
16 report that was used in this matter, the  
17 investigation of Jeffrey Epstein, has been  
18 produced as a document in this matter?

19 A. I have seen a police report.

20 (Maxwell Exhibit 1, police report,  
21 marked for identification.)

22 Q. The police report that you have in  
23 front of you, can you turn to page 28 of that  
24 report, the numbers are on the top right-hand  
25 corner.

1           G Maxwell - Confidential

2       -- just another one of Virginia's many  
3       fictitious lies and stories to make this a  
4       salacious event to get interest and press.  
5       It's absolute rubbish.

6           Q.    Were you in charge of hiring  
7       individuals to provide massages for Jeffrey  
8       Epstein?

9           A.    My job included hiring many people.  
10      There were six homes.  As I sit here, I hired  
11      assistants, I hired architects, I hired  
12      decorators, I hired cooks, I hired cleaners,  
13      I hired gardeners, I hired pool people, I  
14      hired pilots, I hired all sorts of people.

15                In the course and a very small part  
16      of my job was from from time to time to find  
17      adult professional massage therapists for  
18      Jeffrey.

19           Q.    When you say adult professional  
20      massage therapists, where did you find these  
21      massage therapists?

22           A.    From time to time I would visit  
23      professional spas, I would receive a massage  
24      and if the massage was good I would ask that  
25      man or woman if they did home visits.



1 G Maxwell - Confidential

2 Q. Did you hire her?

3 A. First of all, I don't hire girls  
4 like that, so let's be clear, I already  
5 testified to that, and I have no idea what  
6 you are referring to.

7 Q. When you say girls like that, what  
8 do you mean?

9 A. I hire people who are professional  
10 at the house. You are asking if I hired  
11 somebody to do what, I don't know what you  
12 are talking about. I hired people to work in  
13 the homes.

14 Q. What was Nadia Marcinkova doing?

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

17 A. I have no idea what Nadia  
18 Marcinkova was doing. I didn't hire her and  
19 I don't know what you are referring to.

20 Q. You met Nadia Marcinkova?

21 A. I testified I did.

22 Q. Did she work for Jeffrey Epstein?

23 A. I have no idea what she did.

24 Q. Have you flown on planes with Nadia  
25 Marcinkova?

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

4 A. I don't know what that means,  
5 masseuse obligation, I don't know what you  
6 are referring to. Would you like to ask the  
7 question properly?

8 Q. I think it was proper. I will ask  
9 it again.

10 Did you ever assist in getting  
11 Virginia Roberts a cell phone to use during  
12 the time that she worked for Jeffrey Epstein?

13 A. I have no recollection of doing  
14 anything of that nature.

15 Q. Did you ever tell Virginia that you  
16 wanted her to have a cell phone so that she  
17 could be on call regularly?

18 A. I have no recollection of that  
19 conversation.

20 Q. How often would Virginia come over  
21 to the house in Palm Beach to give massages?

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

24 A. Ask the question again, please.

25 Q. How often did Virginia Roberts come

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2 over to the house in Palm Beach to give  
3 massages?

4 A. It's important to understand that I  
5 wasn't with Jeffrey all the time. In fact, I  
6 was only in the house less than half the  
7 time, so I cannot testify to when I wasn't in  
8 the house how often she came when I wasn't  
9 there.

10 What I can say is that I barely  
11 would remember her, if not for all of this  
12 rubbish, I probably wouldn't remember her at  
13 all, except she did come from time to time  
14 but I don't recollect her coming as often as  
15 she portrayed herself.

16 Q. How many times a day on an average  
17 day would Jeffrey Epstein get a massage?

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

20 A. When I was at the house and when I  
21 was there with him, he received a massage, on  
22 average, about once a day.

23 Q. Just once?

24 A. Yes.

25 Q. Were there days when he received

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2 four or five?

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

5 A. When I was present at the house, I  
6 never saw something like that.

7 Q. Do you know if Virginia was  
8 required to be on call at all times to come  
9 to the house if Jeffrey wanted her there?

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

12 A. I have no idea of the arrangements  
13 that Virginia made with Jeffrey.

14 Q. When Virginia was in New York,  
15 would Virginia sleep at Jeffrey's mansion in  
16 New York?

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

19 A. I don't recollect her being in New  
20 York and I have no idea where she slept.

21 Q. You don't ever remember seeing  
22 Virginia Roberts in New York?

23 MR. PAGLIUCA: Objection to the  
24 form and foundation.

25 A. I would barely recollect her at

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2 him at any of those homes?

3 A. Again, Virginia is absolutely  
4 totally lying. This is a subject of  
5 defamation about Virginia and the lies she  
6 has told and one of lies she told was that  
7 President Clinton was on the island where I  
8 was present. Absolutely 1000 percent that is  
9 a flat out total fabrication and lie.

10 Q. You did fly on planes, Jeffrey  
11 Epstein's planes with President Clinton, is  
12 that correct?

13 A. I have flown, yes.

14 Q. Would it be fair to say that  
15 President Clinton and Jeffrey are friends?

16 A. I wouldn't be able to characterize  
17 it like that, no.

18 Q. Are they acquaintances?

19 A. I wouldn't categorize it.

20 Q. He just allowed him to use his  
21 plane?

22 A. I couldn't categorize Jeffrey's  
23 relationship.

24 Q. When you were on the plane with  
25 Jeffrey and President Clinton, did you

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2 building that you would have seen when you  
3 were on the trip in Europe?

4 MR. PAGLIUCA: Objection to the  
5 form and foundation.

6 A. I can't possibly answer that.

7 Q. Do you recall Virginia ever taking  
8 pictures?

9 A. I barely recall Virginia, period.

10 Q. Do you recall her ever taking  
11 pictures?

12 A. No, I don't.

13 Q. I'm going to direct your attention,  
14 still within the flight logs to -- starting  
15 on the next page from where you just were  
16 which is going to be 000747. And the date at  
17 the top says 2001, you will see March and I'm  
18 directing your attention down towards the  
19 middle to the bottom where you will see the  
20 numbers 27, 29 and 31.

21 A. Uh-huh.

22 Q. And we've got actually I'm going to  
23 direct your attention to the one that starts  
24 with TEB for Teterboro to SAF for Santa Fe  
25 and the one below it Santa Fe to Palm Beach

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2 her but you would have to ask Jeffrey what he  
3 brought her on the trip for.

4 Q. But she would travel with him when  
5 there was a work trip like this?

6 A. I can't -- I'm seeing that she is  
7 on this flight but I have no idea what she is  
8 doing, he invited her, it would not be my  
9 job.

10 Q. What about Nadia Bjorlin, would she  
11 regularly travel with Jeffrey on flights?

12 A. I have no idea, you would have to  
13 look through the flight logs. I have no  
14 idea.

15 Q. Your recollection is -- what is  
16 your recollection, do you recollect Nadia  
17 traveling often on flights with Jeffrey?

18 A. Absolutely not. No, not at all. I  
19 don't recollect her actually on the flight at  
20 all.

21 Q. I think you can set that aside for  
22 the moment.

23 (Maxwell Exhibit 9, message pad  
24 pages, marked for identification.)

25 Q. We will mark as Exhibit 9 these

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2 excerpts from -- we will identify what they  
3 are but from the message pads.

4 Did you want to correct anything?

5 A. I want to make an addendum.

6 Would you mind rereading the last  
7 question back to me?

8 (Record read.)

9 A. I also just want to say that at  
10 this point I cannot recollect flying to  
11 parties. Jeffrey went for work so -- was  
12 this in Santa Fe, this flight as well.

13 Q. The flight we were looking at, yes  
14 but it was to Santa Fe --

15 A. I don't recall going to any parties  
16 in Santa Fe at any time but certainly flying  
17 to Santa Fe for a party seems highly  
18 improbable.

19 Q. So I'm going to direct your  
20 attention to the document that I set before  
21 you which is Bates number SAO 01456 and it  
22 has different Bates numbers because it's a  
23 smaller version of the larger production.  
24 These are the pages I will be asking about.

25 In the time that you were working



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2 with Jeffrey in Palm Beach, do you recall a  
3 process for taking, anybody at the house  
4 taking messages when incoming phone calls  
5 came in?

6 A. You are supposed to take a message  
7 and receive the message and write the message  
8 down. Who was the message was for, what time  
9 it was taken and who took it and what the  
10 message was, obviously.

11 Q. Does what's in front of you look  
12 familiar with respect to the message pads  
13 that you would have used at the house?

14 A. It is familiar.

15 Q. I'm going to direct your attention  
16 to the second page of it?

17 MR. PAGLIUCA: These all have SAO  
18 numbers on them or Bates ranges and I  
19 don't see any of your Bates ranges on  
20 these. I know you have produced message  
21 pads but those have your Bates range  
22 numbers on them and I'm wondering if  
23 these are different documents.

24 MS. McCAWLEY: It's the same, just  
25 ours have the Bates underneath them.

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2 believe. Do you believe --

3 A. I can only testify --

4 Q. Let me finish the question so the  
5 record is clear.

6 Do you believe Jeffrey Epstein  
7 sexually abused minors?

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

10 Q. You can answer.

11 A. I can only testify to what I know.  
12 I know that Virginia is a liar and I know  
13 what she testified is a lie. So I can only  
14 testify to what I know to be a falsehood and  
15 half those falsehoods are enormous and so I  
16 can only categorically deny everything she  
17 has said and that is the only thing I can  
18 talk about because I have no knowledge of  
19 anything else.

20 Q. I'm not asking about Virginia. I'm  
21 asking whether you believe that Jeffrey  
22 Epstein sexually abused minors?

23 A. Again, I repeat, I can only go on  
24 what I know and what I know is a falsehood  
25 based on what Virginia said.

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2 What I'm asking you is whether you  
3 believe Jeffrey Epstein abused minors?

4 MR. PAGLIUCA: I object to the form  
5 and you made your record, she answered  
6 the question. A fair reading of her  
7 answer is she doesn't have a belief  
8 because she doesn't have any personal  
9 knowledge.

10 MS. McCAWLEY: Now you are  
11 testifying for the witness. Let her  
12 answer the question.

13 MR. PAGLIUCA: It's a fair answer  
14 to the question.

15 A. Again, I testified my only personal  
16 knowledge concerns Virginia and everything  
17 Virginia has said is an absolute lie, which  
18 is why we are here in this room. If you are  
19 asking me to testify about things I have no  
20 knowledge of other than the police report  
21 that you showed me, I am not in a position to  
22 make a statement based on that because you  
23 are asking me to speculate and I cannot  
24 speculate.

25 Q. I'm asking you about your belief.

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2 I'm not asking you to speculate at all. I'm  
3 asking what you believe.

4 A. You are asking me to speculate and  
5 I won't speculate.

6 Q. I'm not asking you to speculate.  
7 I'm asking what you believe.

8 MR. PAGLIUCA: She answered the  
9 question and we can move on.

10 MS. McCAWLEY: She hasn't answered  
11 the question.

12 MR. PAGLIUCA: We are not going to  
13 engage in this debate. She answered the  
14 question. If you want to mark it and  
15 move to compel an answer to the  
16 question, have at it. Okay.

17 Q. Ms. Maxwell, is it your belief that  
18 Jeffrey Epstein interacted sexually with  
19 minors?

20 A. Again, you are asking me the same  
21 type of question exactly but with different  
22 language. Again, my only knowledge of  
23 somebody who claims these things that I have  
24 personal knowledge of is Virginia. Virginia  
25 is an absolute liar and everything she has

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2 said is a lie. Therefore, based on those  
3 lies I cannot speculate on what anybody else  
4 did or didn't do because if Virginia is the  
5 example of what that story is and everything  
6 she said is false, so everything that leads  
7 from that is false.

8 Q. So the 30 other minor children in  
9 the police report are also telling lies about  
10 being sexually abused during massages with  
11 Mr. Epstein?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation. Counsel, can you  
14 show me in these police reports who the  
15 30 minors are?

16 MS. MCCAWLEY: I'm asking my  
17 question.

18 MR. PAGLIUCA: You are making a  
19 representation about numbers, you are  
20 making a representation on the record  
21 about what people said or didn't say.  
22 We have no knowledge about that. These  
23 are all redacted records so these are  
24 bad questions. They don't lead to any  
25 admissible evidence. It is only being

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2 A. I'm carrying on.

3 Q. I'm sorry. I thought you were  
4 done.

5 A. Please. Her statement also that  
6 she was driven by her father to Palm Beach.  
7 She was driven by her mother, as a matter of  
8 fact. Her whole entire characterization of  
9 the first meeting with Jeffrey, as I was  
10 outside speaking to her mother.

11 Q. Let me stop you there, so we don't  
12 get too far ahead. Let me make sure I  
13 understand your testimony.

14 The first, in the first piece when  
15 you were talking, I believe you said and  
16 correct me if I'm wrong, that her  
17 characterization of the first meeting at  
18 Mar-a-Lago was an obvious lie.

19 What part of that meeting was an  
20 obvious lie?

21 A. By her own testimony, all her  
22 various many different descriptions of what  
23 she was or wasn't or where she was or wasn't,  
24 they have all changed. She was either front  
25 of house or bathroom attendant. I don't know

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2 what she was, so just by her own words, one  
3 doesn't know what's true and what isn't true.

4 Q. Are you saying what position she  
5 said she was working in, is that what you are  
6 considering the obvious lie?

7 A. I said inconsistency within her own  
8 statement from everything, so in the  
9 beginning it starts off with different  
10 statements.

11 Q. Then I believe you said the second  
12 piece was that she was driven by her father?

13 A. I said she was driven by her  
14 mother.

15 Q. That's the obvious lie?

16 A. It's an obvious lie to me.

17 Q. You said why don't you state it in  
18 your own words but the characterization of  
19 how she was with Jeffrey, what about that is  
20 an obvious lie?

21 A. I was standing outside talking to  
22 her mother so the entire story is a  
23 fabrication.

24 Q. Did she not have sex with Jeffrey  
25 Epstein during that first massage?

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2 up to the room and start a massage?

3 A. He would not.

4 Q. So the young girls in the police  
5 report who say they came over and were led up  
6 to the room on the first day, would they be  
7 wrong about that?

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

10 A. I can't comment what happened when  
11 I was not at the house. I can only comment  
12 when I was at the house.

13 Q. Was there ever a time where a woman  
14 came to the house for the first time to give  
15 a massage and Jeffrey had the massage that  
16 day?

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

19 A. Can we talk about adult  
20 professional masseuses, please?

21 Q. I'm asking, whether adult or  
22 underage?

23 A. I'm not interested in talking about  
24 underage. I can only testify to what I know,  
25 professional masseuses, adult, I cannot



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2 testify to anything else.

3 Q. Why can't you testify to an  
4 underage girl that came over and was led up  
5 to the room for a massage?

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

8 A. The police records you are  
9 referring to?

10 Q. You are saying that didn't happen.  
11 You're saying I can only testify to adults  
12 that came for an interview and were led up to  
13 the room. Why can't you testify to whether  
14 an underage girl was brought in for an  
15 interview and led up --

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

18 Q. Go ahead.

19 A. Can you reask the question.

20 Q. Why can't you testify as to an  
21 underage girl who came over for an interview  
22 and then was then led up to the room for the  
23 massage?

24 A. You've mangled your entire  
25 question. Can you please reask that in a way

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2   present at the home when a girl under the age  
3   of 18 came over for the purposes of giving a  
4   massage?

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

7                   Q.    You can answer.

8                   A.    You can be a professional masseuse  
9   at 17 in Florida, so as far as I am aware, a  
10   professional masseuse showed up for a  
11   massage.  There is nothing inappropriate or  
12   incorrect about that and your  
13   mischaracterization of it, I think is  
14   unfortunate.

15                  Q.    How many teenagers did he have that  
16   were professional masseuses that worked in  
17   his home?

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

20                  Q.    How many?

21                  A.    First of all, I am not aware of  
22   teenagers who worked in his home.

23                  Q.    You are aware of Virginia Roberts  
24   and you've stated she was 17 and she worked  
25   for him, correct?