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1 told me that she knew somebody who was looking for a  
2 traveling masseuse.

3 And I said, Well, I don't have any  
4 accreditations. This is the first book I've ever  
5 read. She goes, That's okay. I know somebody. We  
6 can train you. We can get you educated. You know,  
7 we can help you along the way if you pass the  
8 interview.

9 If the guy likes you, then, you know, it  
10 will work out for you. You'll travel. You'll make  
11 good money. You'll be educated, and you'll finally  
12 get accredited one day.

13 Q Okay.

14 A She finished off by, you know, giving me  
15 her number. And I told her I'd have to ask my dad.  
16 And I called my dad. I ran over, actually, to see my  
17 dad, talked to him. He said it would be okay. I  
18 used the phone from Mar-a-Lago to call her and tell  
19 her that I was allowed to come over.

20 And she said, Great. Meet me here at -- I  
21 don't remember the exact address, but it was  
22 El Brillo Way in Palm Beach -- after you get off.  
23 And my dad drove me.

24 Q Did you write down her add -- the address  
25 that she gave?

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1 A Yes.

2 Q Did you write down her phone number?

3 A Yes.

4 Q So did you go run and talk to your dad  
5 while she was still there?

6 A No, I believe she left. And she told me  
7 to ask my dad and then to give her a phone call.

8 Q Okay. Did she ask you your age when she  
9 had that conversation with you?

10 A No, she did not.

11 Q Did you tell her your age?

12 A No, I did not.

13 Q And so somewhere you wrote down a phone  
14 number to call her back at?

15 A Um-hum.

16 Q All right. And where did you write that  
17 down?

18 A Probably just a piece of paper lying  
19 around the desk.

20 Q Okay. But you don't remember?

21 A I mean, no, I don't have that piece of  
22 paper anymore, so no.

23 Q Okay. And did you write down an address?

24 A Yes.

25 Q And what number do you think you called?

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1 Q When did you get your first car?

2 A After my trip to London to meet Prince  
3 Andrew.

4 Q Okay. What kind of car did you get?

5 A A Dodge Dakota.

6 Q And did you purchase that yourself?

7 A Yes, I did.

8 Q And how much did it cost?

9 A I don't remember off the top of my head  
10 how much it cost.

11 Q Who did you buy it from?

12 A My dad helped me bargain with it. I don't  
13 remember where we bought it from.

14 Q And was the title put in your name or your  
15 dad's name?

16 A I think the title was put in my name. I  
17 think. I mean, my dad was with me. I've never  
18 registered a car or anything like that before. So --

19 Q So that was your first time?

20 A Yes.

21 Q Memorable, right?

22 A Yes.

23 Q When you got there, a butler or someone  
24 answered the door, is that what you said?

25 A No, Ghislaine answered the door.

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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

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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

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1           A       I believe Juan Alessi was pretty much  
2       within ear distance.

3           Q       Could you see him?

4           A       Yes.

5           Q       Okay.

6           A       Like I said, in ear distance, when I mean  
7       ear distance like hearing, in the hearing vicinity.  
8       And it was in the same time that she was asking him  
9       to drop me off at home.

10          Q       Okay. When you were driving home the  
11       first night with Juan Alessi, did you have any  
12       conversation with him?

13          A       No. I had told him my address. It was a  
14       very quiet ride.

15          Q       Did you ride in the front or the back?

16          A       The front.

17          Q       It is your contention that, Ghislaine  
18       Maxwell had sex with underage girls virtually every  
19       day when I was around her, correct?

20          A       Yes.

21          Q       All right. With whom did Ghislaine  
22       Maxwell have sex in your presence?

23          A       Well, there's a lot of girls that were  
24       involved. We weren't on a first name basis with each  
25       other. I wouldn't be able to give you lists of names

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1 of girls. It was continuous.

2 Q It was continuous. Name one girl that  
3 Ghislaine Maxwell had sex with in your presence.

4 A Emmy Taylor. I mean, that's a name that I  
5 know well because Emmy was always around.

6 I'm trying to think of her name, sorry.  
7 Sarah. Her name used to be Sarah Kellen. I think  
8 she's changed it now that she's married.

9 [REDACTED] (phonetic) -- I can't  
10 pronounce her last name properly, but it's around  
11 those lines.

12 There were a lot of other girls that I  
13 honestly can't remember their names. I'm sorry. I  
14 wish I could help out more because I really would  
15 like to provide more witnesses for this, but I can't  
16 remember a lot of girls' names.

17 Q So those are the three names of females  
18 that you observed Ghislaine Maxwell have sex with --

19 MR. EDWARDS: Object to the form.  
20 Mischaracterizes testimony.

21 Q (BY MS. MENNINGER) -- is that what I  
22 understand your answer to be?

23 MR. EDWARDS: Objection. Mischaracterizes  
24 her testimony.

25 A Those are -- those are some three of the

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1 Q More than 20?

2 A I would say more than 20.

3 Q More than 50?

4 A I don't think more than 50, but --

5 Q Did --

6 A I don't have an exact number. I mean,  
7 if -- I think if you look at the flight logs, you  
8 know, that helps, but then they're not fully  
9 complete. We only have flight logs to one plane and  
10 then there's a time I was flown commercially into the  
11 island.

12 Q Um-hum.

13 A So it's really hard for me to gauge a  
14 number.

15 Q Okay. Do you have any photographs of  
16 yourself on the island?

17 A I know I used to, but they would be left  
18 in that apartment.

19 Q What other locations did you participate  
20 in sexual contact with Ghislaine Maxwell, other than  
21 the island?

22 A Everywhere. New York, Palm Beach.

23 Q Where in New York?

24 A The mansion, Jeffrey's mansion.

25 Q Okay. Anywhere else in New York?

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1 think I met Prince Andrew in 2001. And Glenn Dubin  
2 and Stephen Kaufmann were, like I said, the first  
3 people I was sent out to after my training. So I  
4 don't know. I'm not going to give you an exact time  
5 if I don't know it.

6 Q I asked you the relative order.

7 A And I'm trying to give you it.

8 Q And where does Alan Dershowitz fit into  
9 that group of people?

10 A Same. I can't tell you piece by piece by  
11 piece who -- I know Glenn Dubin was first.

12 Q Okay.

13 A And I know Stephen Kaufmann was one of the  
14 first I was sent to. Alan Dershowitz could have been  
15 between there. Between, sorry, between Glenn and  
16 Stephen. The first time I was with Alan Dershowitz  
17 was in New York, so I wasn't actually sent to him.  
18 It actually happened at one of Jeffrey's residences.

19 (Ms. McCawley left the deposition.)

20 A So it's very hard for me to  
21 chronologically give you each person individually.

22 Q (BY MS. MENNINGER) Okay. Name the other  
23 politically connected and financially powerful people  
24 that Ghislaine Maxwell told you to go have sex with?

25 A Again, I'm going to tell you "they"

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1 because that's how it went. They instructed me to go  
2 to George Mitchell, Jean Luc Brunel, Bill Richardson,  
3 another prince that I don't know his name. A guy  
4 that owns a hotel, a really large hotel chain, I  
5 can't remember which hotel it was. Marvin Minsky.

6 There was, you know, another foreign  
7 president, I can't remember his name. He was  
8 Spanish. There's a whole bunch of them that I  
9 just -- it's hard for me to remember all of them.  
10 You know, I was told to do something by these people  
11 constantly, told to -- my whole life revolved around  
12 just pleasing these men and keeping Ghislaine and  
13 Jeffrey happy. Their whole entire lives revolved  
14 around sex.

15 They call massages sex. They call  
16 modeling sex. They call --

17 Q I asked you the names for people. Are you  
18 going to tell me any other names or is that all of  
19 them?

20 A I'm trying to think. That's the answer  
21 I'm trying to give to you. It's that it's so hard to  
22 just keep naming and naming and naming.

23 Q All right.

24 A A lot of times I would be introduced to  
25 them. I didn't know --

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1 many times you want me to keep answering this  
2 question. Both told me to do this, okay? They both  
3 sent me to these people.

4 How many times do you want me to answer  
5 this?

6 Q (BY MS. MENNINGER) I think you're  
7 answering a different question so that's why I'm  
8 going to ask you again. I am not asking you anything  
9 about a time when Jeffrey and Ghislaine together told  
10 you to go do something. I'm asking you to name a  
11 single time during which Ghislaine Maxwell acting  
12 alone directed you to go have sex with another  
13 person?

14 MR. EDWARDS: Objection. Asked and  
15 answered. Harassing. Argumentative.

16 A I've given you the names of the people  
17 that Ghislaine instructed me to go have sexual  
18 relations with. I am not discluding (sic) the fact  
19 that Jeffrey also told me.

20 Ghislaine told me from her mouth to do  
21 these things. Jeffrey told me from his mouth to do  
22 these things with these people. Ghislaine instructed  
23 me to do the things that I did with Jeffrey Epstein  
24 on the very first meeting that I had with him. She  
25 brought me there under the preclusion (sic) that I

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1           was going to be trained as a masseuse and that she  
2           instructed me to take off my clothes and to give oral  
3           sex to Jeffrey Epstein.

4           Q       (BY MS. MENNINGER)   Excuse me. I've asked  
5           you for the names.

6           A       I've just given you a name. Jeffrey  
7           Epstein is a big name.

8           Q       All right.

9           A       She instructed me on that one.

10          Q       So you're saying --

11              MR. EDWARDS: The witness is finishing her  
12           answer right now. She's in the process of explaining  
13           one of the people Ghislaine told her to have sex  
14           with.

15          Q       (BY MS. MENNINGER)   So you're saying  
16           Ghislaine Maxwell directed you to have sex with  
17           Jeffrey Epstein?

18          A       Correct.

19          Q       Ghislaine Maxwell directed you to have sex  
20           with Glenn Dubin?

21          A       Correct.

22          Q       What words did Ghislaine Maxwell tell you  
23           to go have sex with Glenn Dubin?

24          A       It was the same all the time, all right?  
25              They want me to go provide these men with a massage.

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1 A When it happened?

2 Q When Ghislaine Maxwell used the words, Go  
3 give a massage to Bill Richardson, where were you?

4 MR. EDWARDS: Object to the form.

5 Mischaracterizes her testimony.

6 A I can't tell you where we were. I know  
7 where I was sent to. I don't know where we were when  
8 she told me to do that.

9 Q (BY MS. MENNINGER) Where were you sent  
10 to --

11 A New Mexico.

12 Q -- by Ghislaine Maxwell?

13 MR. EDWARDS: Object to the form.  
14 Mischaracterizes her testimony again.

15 A Are you smiling at me because --

16 Q (BY MS. MENNINGER) No, I'm asking you to  
17 answer the question.

18 A I have answered the question. I was sent  
19 to New Mexico.

20 Q Okay. Where were you sent from?

21 A I already answered that. I don't know  
22 where I was sent from.

23 Q Okay.

24 A I was flying everywhere with these people.

25 Q Where were you sent by Ghislaine Maxwell

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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,

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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

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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.

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1                   THE VIDEOGRAPHER: We're back on the  
2 record at 2:55.

3                   Q         (BY MS. MENNINGER) Do you have any  
4 photographs of yourself either nude or in a sexually  
5 compromising position that you claim were taken by  
6 Ghislaine Maxwell?

7                   A         I do not have any of those in my evidence.  
8 But if you ask Ghislaine Maxwell, she would have  
9 plenty.

10                  Q         Do you have any in your storage boxes in  
11 Sydney?

12                  A         No.

13                  Q         Do you know whether your attorneys have  
14 any such photographs that you claim were taken by  
15 Ghislaine Maxwell?

16                  A         No.

17                  Q         You don't know or they don't have them?

18                  A         I don't know. And I don't think they have  
19 them. If they had them, they would have told me.  
20 You should ask your client. She's got plenty of  
21 them.

22                  Q         What type of camera did Ghislaine Maxwell  
23 use?

24                  A         It was a black camera. And it had a, I  
25 don't know the types and names of them, but the lens

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1 that goes out.

2 Q Was it digital or single reflex?

3 A Again, I don't know types of cameras. I  
4 mean, I use my phone for using a camera. So it's a  
5 black camera and it had a lens that you could put out  
6 further or bring back.

7 Q Did you ask her to take any photographs of  
8 you?

9 A No. She asked to take photographs of me.

10 Q Was it a film or a digital camera?

11 A I never saw how she printed them out.

12 Q What's the first time you told anybody  
13 that you had been sexually trafficked?

14 MR. EDWARDS: Form.

15 A Tony Figueroa, my ex-boyfriend, knew some  
16 of the stuff that was happening, though I did not go  
17 in great detail to him, being that he's my boyfriend.  
18 And then the first person I really opened up to about  
19 everything was my husband.

20 Q (BY MS. MENNINGER) Did you tell Tony  
21 Figueroa that you were forced to have sex with  
22 Jeffrey Epstein?

23 A Yes.

24 Q Did you tell Tony Figueroa you were forced  
25 to have sex with Ghislaine Maxwell?

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1 any interactions with law enforcement?

2 A Yes.

3 Q When?

4 A When I tried to break away from Jeffrey  
5 and Ghislaine, I started making myself unavailable.  
6 And I got a job at Road House Grill. And Tony used  
7 to come pick me up in the afternoons, at nighttime,  
8 and he'd sit at the bar. And there's this big cup  
9 that's got tips in it.

10 I was in the back room. And I had to --  
11 first you have to sign out and you have to take off  
12 your aprons, put your aprons away. And there's a  
13 whole bunch of cleaning up stuff you have to do.

14 In that time period, Tony grabbed money  
15 from a cup that had money in it. That was for the  
16 bartenders for their tips. My boss called me the  
17 next day. He told me that I had stolen the money,  
18 which I hadn't. And I came back and I returned the  
19 money after I confronted Tony about it. Gave the  
20 money back to him and he said, I'm sorry, but it's  
21 just law that I have to call the police. So he  
22 called the police.

23 And knowing that Jeffrey has got the Palm  
24 Beach Police Department in his pocket, I went to  
25 Jeffrey Epstein and I told him what had happened.

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1           And Jeffrey said, Don't worry about it. Let me take  
2 care of it for you.

3           Q        Okay. I'm sorry. When did you have  
4 interaction with law enforcement, then?

5           A        What year?

6           Q        Did you speak with a law enforcement  
7 officer?

8           A        I don't believe I spoke to them. Jeffrey  
9 handled everything.

10          Q        Okay. And you said that you had finished  
11 your shift at -- this is at the Road House Grill,  
12 correct?

13          A        Correct.

14          Q        You had finished your shift?

15          A        Yeah, it was the end of the shift.

16          Q        Okay. And you had cleaned up and were  
17 checking out, correct?

18          A        Yeah, it's a completely separate part of  
19 the -- it's like back of the house. Do you know what  
20 that means, like in waitering terms?

21          Q        (Indicating.)

22          A        Yeah, back of the house.

23          Q        And what was -- who was this boss that you  
24 spoke to?

25          A        I can't remember his name.

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1 exclusivity?

2 A Yes.

3 Q What was that period?

4 A I believe it was like a three-month period  
5 or something.

6 Q Okay. And what other terms of the  
7 contract, do you recall?

8 A I couldn't talk to any other news  
9 publication about the story.

10 Q Anything else?

11 A Not that I know of.

12 Q Were you happy when the period was up?

13 A Well, I mean, at that time I wanted to  
14 write about my story. So I guess, yes, I was happy  
15 when that period was up.

16 Q And you were actively writing a book at  
17 that time, correct?

18 A My manuscript. I've never published it.

19 Q You were writing the manuscript at the  
20 time of your period of exclusivity with Sharon  
21 Churcher, correct?

22 A Those three months were just craziness. I  
23 think I started after that.

24 Q You think you started writing the book  
25 after the 90 days were up?

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1 A Yeah.

2 Q And then you attempted to sell that  
3 manuscript, correct?

4 A I didn't attempt to sell it. I went to  
5 other publications, like, what do you call them?  
6 People -- I'm trying to think of the name of the  
7 word. People who publish books, not like a newspaper  
8 or anything. And I inquired about what they thought  
9 of my manuscript and if they thought it was, you  
10 know, a good story. And, yeah.

11 Q So you sent the manuscript to these people  
12 for the purposes of trying to publish the book,  
13 correct?

14 A Some people, yes.

15 Q And you were trying to get money from the  
16 book publication, correct?

17 A Well, I wasn't going to sell it to them  
18 for free.

19 Q But you were unsuccessful in finding  
20 someone to publish it, correct?

21 A Well, I was always on the fence with it.  
22 I wasn't too sure if I wanted to or didn't want to.  
23 I was more seeking judgment based upon these people  
24 who have done this plenty and plenty of times.

25 Still to this day, I mean, I've had people

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1 who have been interested in it and I still don't know  
2 if I want to do it yet. I mean, I think there's a  
3 lot more that can go into it, you know.

4 Q You were actively sending the manuscript  
5 to people for purposes of having them reach a deal  
6 with you and publish it, correct?

7 A No deal was ever talked about. What we  
8 talked about was the possibility of publishing it, is  
9 it publishing-worthy, would I need to get a  
10 ghostwriter. You know, this is the first time I've  
11 ever written a manuscript so I didn't know what I was  
12 doing.

13 Q Okay. You contacted Jarred Weisfeld,  
14 correct?

15 A Correct.

16 Q I'm going to mark a document as  
17 Defendant's Exhibit 16. It is a composite exhibit.

18 (Exhibit 16 marked.)

19 MR. EDWARDS: Thank you.

20 Q (BY MS. MENNINGER) I'm not going to ask  
21 you to read every single page of this, but if you  
22 look at the first page.

23 A Um-hum.

24 Q Can you tell what this is in terms of what  
25 type of document?

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1 calm the anxiety and everything down.

2 Q Before you met Jeffrey Epstein, had you  
3 used any drugs?

4 A Sure, yes.

5 Q Which drugs had you used prior to meeting  
6 Jeffrey Epstein?

7 A I smoked pot. I've taken Ecstasy.

8 Q Cocaine?

9 A Yeah, I would have snorted cocaine,  
10 um-hum.

11 Q Did you ever abuse alcohol before meeting  
12 Jeffrey Epstein?

13 A No, I was -- I wasn't even of age to be  
14 able to buy it. I mean, if there was alcohol at  
15 parties I would have drank it, but I wouldn't say I  
16 abused it.

17 Q Okay. Were there ever occasions upon  
18 which you were observed to be drunk by other people,  
19 prior to meeting Jeffrey Epstein?

20 A If you're drinking, the possibility of  
21 getting drunk is always there. I don't -- I can't  
22 recall exact situation where that was the case,  
23 but --

24 Q Were you diagnosed as a drug addict prior  
25 to meeting Jeffrey Epstein?

***Agren Blando Court Reporting & Video, Inc.***

1           AGREN BLANDO COURT REPORTING & VIDEO, INC.  
2           216 - 16th Street, Suite 600  
3           Denver, Colorado 80202  
4           4450 Arapahoe Avenue, Suite 100  
5           Boulder, Colorado 80303

6           May 11, 2016

7           Sigrid S. McCawley, Esq.  
8           BOIES, SCHILLER & FLEXNER LLP  
9           401 East Las Olas Boulevard  
10          Suite 1200  
11          Fort Lauderdale, FL 33301-2211

12          Re: Videotaped Deposition of VIRGINIA GIUFFRE  
13          Giuffre v. Maxwell  
14          Case No. 15-cv-07433-RWS

15          The aforementioned deposition is ready for reading  
16          and signing. Please attend to this matter by  
17          following BOTH of the items indicated below:

18           Call 303-296-0017 and arrange with us to read  
19          and sign the deposition in our office.

20           XXX Have the deponent read your copy and sign  
21          the signature page and amendment sheets, if  
22          applicable; the signature page is attached.

23           Read the enclosed copy of the deposition and  
24          sign the signature page and amendment  
25          sheets, if applicable; the signature page is  
              attached.

26           XXX WITHIN 30 DAYS OF THE DATE OF THIS LETTER

27           By           due to a trial date of

28          Please be sure the original signature page and  
29          amendment sheets, if any, are SIGNED BEFORE A NOTARY  
30          PUBLIC and returned to Agren Blando for filing with  
31          the original deposition. A copy of these changes  
32          should also be forwarded to counsel of record.  
33          Thank you.

34           AGREN BLANDO COURT REPORTING & VIDEO, INC.

35           cc: All Counsel

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***VIRGINIA GIUFFRE VOLUME II***

*11/14/2016*

---

***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 VIDEO DEPOSITION OF  
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP  
By Sigrid S. McCawley, Esq.  
401 East Las Olas Boulevard  
Suite 1200  
Fort Lauderdale, FL 33301  
Phone: 954.356.0011  
[smccawley@bsfllp.com](mailto:smccawley@bsfllp.com)  
Appearing on behalf of the Plaintiff

***Agren Blando Court Reporting & Video, Inc.***

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.  
3 By Laura 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 Ann Lundberg, Paralegal  
14 Maryvonne Tompkins, Videographer

15

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***Agren Blando Court Reporting & Video, Inc.***

1 A Yes.

2 Q And you believe the Neiman Marcus was  
3 located in which city?

4 A Well, it's around Fort Lauderdale. I  
5 can't tell you exactly. Fort Lauderdale is so big,  
6 like Broward County? Is that the word for it?

7 Q And what did you do at Neiman Marcus?

8 A I worked in the changing rooms.

9 Q And what did you do in the changing room?

10 A I think I just like -- if I remember  
11 right, I just put clothes away that people left in  
12 there. Probably went out to get sizes, different  
13 sizes for women who wanted different sizes of the  
14 same product.

15 Q And where did you work after Neiman  
16 Marcus?

17 A Taco Bell.

18 Q Did you work at Southeast Employee  
19 Management Company?

20 A I don't recognize that. I don't know if  
21 that's a payroll company or what it is. I don't know  
22 what Southeast -- what is it called?

23 Q Southeast Employee Management Company.

24 A No, I don't remember that.

25 Q Did you ever work as a temp?

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1 A Not that I remember.

2 Q Going to different offices and filling in?

3 A No.

4 Q Did you work for Oasis Outsourcing?

5 A I don't -- I don't know if that's a  
6 payroll company or if that's an actual place, but  
7 that doesn't ring a bell.

8 Q Did you -- do you know how much you got  
9 paid when you were working at places like Oasis  
10 Outsourcing?

11 A Well, considering I don't know if I worked  
12 at Oasis Outsourcing, I wouldn't even know how much I  
13 got paid.

14 Q Did you review your Social Security  
15 records?

16 A Yes.

17 Q You saw Oasis Outsourcing listed there?

18 A Right, but like I said, it doesn't even  
19 ding a bell at all.

20 Q Do you know how much money they said you  
21 made from them?

22 MS. MCCAWLEY: Objection. If you want to  
23 show her the documents, she can see what amount is  
24 listed and answer your questions, but if you're not  
25 going to show her the document, that's the best she

***Agren Blando Court Reporting & Video, Inc.***

1 can do.

2 A Yeah, if you could. I'm happy to answer  
3 your questions. I want to be helpful, so...

4 Q (BY MS. MENNINGER) Great. Well, do you  
5 remember how much money you made from Oasis  
6 Outsourcing?

7 A Like I said, I don't even remember working  
8 for Oasis Outsourcing, or what it is, so I couldn't  
9 tell you.

10 Q Do you remember how much money you were  
11 making per hour at Neiman Marcus?

12 A No, not off the top of my head.

13 Q Do you know how many months you worked  
14 there?

15 A Not long. I'd probably say -- I mean, I  
16 don't know. I'm not going to guess. But around the  
17 three-month mark would be my -- I don't know the  
18 exact answer.

19 Q Do you remember any of your coworkers?

20 A No.

21 Q Did you work at Mannino's?

22 A Briefly, yes.

23 Q What is Mannino's?

24 A A cute little Italian restaurant in  
25 Wellington.

**Agren Blando Court Reporting & Video, Inc.**

1 Q And what did you do at Mannino's?

2 A I did waitressing.

3 Q And how much did you make?

4 A Oh, I don't know. I don't remember.

5 Q Did you work at TGI Fridays?

6 A Again, very shortly. Short time period,  
7 and I was a waitress again.

8 Q And how much did you make there?

9 A I have no idea.

10 Q Did you get fired?

11 A No.

12 Q Why did you leave?

13 A I was -- that's around the time period  
14 that I was approached by -- I can't remember his  
15 name, but he owned a veterinary clinic or he was a  
16 vet, one of the two, and he offered me to come work  
17 for him.

18 Q When you were working at TG -- TGI  
19 Fridays, were you also working at the Roadhouse  
20 Grill?

21 A No.

22 Q Those were not at the same time?

23 A I don't know. I don't think so. Maybe  
24 consecutively like after each other.

25 Q Do you recall working at the Roadhouse

***Agren Blando Court Reporting & Video, Inc.***

1 Grill?

2 A Yes.

3 Q And why did you leave there?

4 A We all know that the thing that went down  
5 there. Tony picked me up and took some money out of  
6 a jar, and then I went to go give it back to the guy,  
7 thinking that it would be all right, and it wasn't.  
8 So I got fired, I think.

9 Q Sure. Okay. I show you some -- are we on  
10 9?

11 MR. PAGLIUCA: Yes, 9.

12 Q (BY MS. MENNINGER) I'd like to show you  
13 Defendant's Exhibit 9.

14 (Exhibit 9 marked.)

15 THE DEPONENT: Thank you.

16 Q (BY MS. MENNINGER) Do you recognize your  
17 handwriting on this document?

18 A Yes.

19 Q Did you fill out an application for  
20 employment --

21 A Yes.

22 Q -- on March 26th of 2002?

23 A Yes.

24 Q And where were you living at that time?

25 A I've put down my parents' address, but I

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1 and seasonal employee, correct?

2 A Correct.

3 Q And your dad was a full-time year-round  
4 employee, right?

5 A Yes.

6 Q He worked there all the time.

7 A Yes.

8 Q And your job was a seasonal employment.

9 A Well, as far as I know --

10 MS. MCCAWLEY: Objection.

11 A -- I was hired for the summer, so....

12 Q (BY MS. MENNINGER) Right. Okay. So the  
13 work hours, in the next paragraph, what -- what is  
14 that -- can you just read that bottom paragraph for  
15 us?

16 A "The Club never shuts down from  
17 November 1st to Mother's Day; for 24 hours a day, 7  
18 days a week, it serves the diverse needs of our  
19 members. Therefore to ensure the adequate coverage  
20 at all times, departments have arranged different  
21 schedules for their employees."

22 Q Okay. I'm going to show you Defendant's  
23 Exhibit 20.

24 A Close this one?

25 Q Yeah.

***Agren Blando Court Reporting & Video, Inc.***

1 STATE OF COLORADO)

2 ) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER )

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

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

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

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

20 My commission expires September 3, 2018.

21  
22  
23 Pamela J. Hansen, CRR, RPR, RMR  
24 216 - 16th Street, Suite 600  
25 Denver, Colorado 80202

# EXHIBIT 6

(Filed Under Seal)

ROSS NEIL SUTHERLAND GOW 11/18/2016

1 IN THE HIGH COURT OF JUSTICE  
2 QUEEN'S BENCH DIVISION

3 Claim No. CR 2016 624

4 BETWEEN:

5 VIRGINIA L. GIUFFRE Applicant,  
6 and  
7 ROSS GOW,  
8 Respondent.

9 AND:

10 UNITED STATES DISTRICT COURT  
11 SOUTHERN DISTRICT OF NEW YORK

12 Virginia L. Giuffre, )  
13 Plaintiff, )  
14 )  
15 v. ) Case No. 15 cv 07433 RWS  
16 )  
17 Ghislaine Maxwell, )  
18 Defendant. )

19

20 Friday, November 18, 2016

21 AT: 8:27 a.m.

22 Taken at:

23

24 Essex Chambers 29,  
25 81 Chancery Lane,  
London, UK, WC2A 1DD

26 Court Reporter: Lisa Barrett, Accredited Real time  
27 Reporter

28

ROSS NEIL SUTHERLAND GOW 11/18/2016

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1	A. No, I have not.	08:31:58
2	Q. When you met her last night, did she assist you	08:32:01
3	in preparation for this deposition?	08:32:04
4	A. No.	08:32:07
5	Q. Did she tell you anything about this case?	08:32:10
6	A. No.	08:32:13
7	Q. Do you know Ghislaine Maxwell?	08:32:20
8	A. I do know Ms. Maxwell, yes.	08:32:24
9	Q. How did you meet her?	08:32:26
10	A. I met her in the offices of Devonshires law	08:32:27
11	firm on or around March 2011.	08:32:31
12	Q. So your first meeting was in person?	08:32:37
13	A. First meeting was in person, yes.	08:32:41
14	Q. Had you spoken to her prior to that?	08:32:42
15	A. I believe that the very first engagement was --	08:32:45
16	I was introduced to her by my chairman Brian Basham but	08:32:50
17	I believe the first words we had were in the Devonshire	08:32:54
18	law office.	08:32:58
19	Q. Did Ms. Maxwell retain the services of you or	08:33:00
20	your firm?	08:33:03
21	A. Yes, she did.	08:33:04
22	Q. And was that in March of 2011?	08:33:06
23	A. It was.	08:33:09
24	Q. Do you have a written agreement?	08:33:11
25	A. We did have a written agreement but I can no	08:33:14

ROSS NEIL SUTHERLAND GOW 11/18/2016

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1	longer locate that agreement.	08:33:16
2	Q. Was that agreement ever renewed?	08:33:19
3	A. It was renewed, I believe on or around the	08:33:21
4	beginning of January 2015, potentially the 2nd of January	08:33:26
5	via email.	08:33:32
6	Q. Was the agreement revised when it was renewed?	08:33:34
7	A. It wasn't revised. It was a straightforward	08:33:38
8	re-establishment of the original agreement.	08:33:42
9	Q. Is it your belief that that agreement was in	08:33:45
10	effect on January 2nd, 2015?	08:33:49
11	A. Yes.	08:33:53
12	Q. Do you recall the terms of that agreement?	08:33:59
13	A. Well, it was a re-establishment of an existing	08:34:03
14	agreement so if we go back to the original agreement, it	08:34:06
15	was to provide public relations services to Ms. Maxwell	08:34:08
16	in the matter of Guiffre and her activities.	08:34:13
17	MS. SCHULTZ: I'm marking as Exhibit 2, a	08:34:29
18	document labeled GM 00068.	08:34:31
19	(Exhibit 2 was marked for identification)	08:30:48
20	MR. DYER: Why don't you start making a pile of	08:34:38
21	them, Mr. Gow, because it may be that later on you'll be	08:34:40
22	asked to go back to them.	08:34:43
23	THE WITNESS: Yes, sir.	08:34:44
24	MR. DYER: You don't have copies for me of	08:34:55
25	these documents?	08:34:57

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 14

1	MS. SCHULTZ: I do not have any more copies on	08:34:58
2	that.	08:34:59
3	MR. DYER: No, no, no, it's much more important	08:35:00
4	that ... just for the purpose of following things, it's	08:35:00
5	easier.	08:35:03
6	BY MS. SCHULTZ:	08:35:12
7	Q. Is ross@acuityreputation.com your email	08:35:12
8	address?	08:35:15
9	A. It is, my business email, yes.	08:35:16
10	Q. Did you send the email depicted in this	08:35:18
11	document?	08:35:21
12	A. Yes, I did.	08:35:26
13	Q. Did you send it on January 2nd, 2015?	08:35:27
14	A. I believe I did.	08:35:31
15	Q. When you sent that email were you acting	08:35:34
16	pursuant to Ms. Maxwell's retention of your services?	08:35:36
17	A. Yes, I was.	08:35:41
18	Q. Could you please tell me everything you know	08:35:58
19	about Virginia Roberts Guiffre.	08:36:00
20	MS. MENNINGER: Objection, foundation and form.	08:36:09
21	MR. DYER: You may answer.	08:36:11
22	BY MS. SCHULTZ:	08:36:11
23	Q. You testified earlier that you were retained --	08:36:12
24	MR. DYER: Are you withdrawing that question?	08:36:15
25	BY MS. SCHULTZ:	08:36:17

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 15

1	Q. No, I'm not, I'm not. Please -- I am	08:36:17
2	withdrawning that question.	08:36:20
3	MR. DYER: Alright.	08:36:20
4	MS. SCHULTZ: I am withdrawning that question.	08:36:20
5	BY MS. SCHULTZ:	08:36:22
6	Q. You testified previously that you were retained	08:36:22
7	to handle matters relating to Virginia Roberts Guiffre;	08:36:24
8	is that correct?	08:36:29
9	A. Correct.	08:36:30
10	Q. Okay. So you are aware of who Ms. Roberts	08:36:31
11	Guiffre is?	08:36:35
12	A. I am.	08:36:36
13	Q. Okay. Please tell me everything you know about	08:36:37
14	Virginia Roberts Guiffre, please.	08:36:39
15	MS. MENNINGER: Objection, foundation, form,	08:36:42
16	and may call for privileged materials.	08:36:43
17	BY MS. SCHULTZ:	08:36:45
18	Q. You can answer -- to the extent that anything	08:36:46
19	you testify to is not protected by a privilege.	08:36:48
20	A. Ms. Roberts first came to my attention on or	08:36:58
21	around March 2011 when I was called into a meeting with	08:37:03
22	Philip Barden and Ms. Maxwell at Devonshires law office,	08:37:08
23	that she had made -- Ms. Guiffre had made extremely	08:37:14
24	unpleasant allegations about Ms. Maxwell's private life.	08:37:20
25	We were -- Acuity Reputation, my firm	08:37:26

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 16

1	was called in to protect Ms. Maxwell's reputation, and	08:37:29
2	to set the record straight. That was -- and that work	08:37:33
3	commenced on or around March of 2011.	08:37:42
4	Q. What do you mean by "set the record straight"?	08:37:46
5	A. Ms. Guiffre's allegations about Ms. Maxwell	08:37:51
6	were, we believe, and to this day continue to believe,	08:37:55
7	untrue, defamatory, and fantastical. And with	08:37:58
8	Devonshires' lawyers, we set about putting out --	08:38:09
9	crafting a statement which would put Ms. Maxwell's point	08:38:15
10	of view across that Ms. Guiffre's allegations were untrue	08:38:19
11	and, frankly, abhorrent.	08:38:25
12	Q. What advice did you give Miss Maxwell as part	08:38:28
13	of your retention?	08:38:31
14	A. It is standard procedure in cases where it's	08:38:32
15	understood that a party may be defaming one's client that	08:38:36
16	one puts out a statement correcting those allegations and	08:38:42
17	providing a clearer picture of where the truth lies. So	08:38:46
18	it was very much our counsel that Ms. Maxwell put out a	08:38:49
19	statement, vehemently denying the allegations.	08:38:55
20	Q. When you testified that Ms. Guiffre, I'm going	08:38:59
21	to refer to her by just her married name, came to your	08:39:03
22	attention at that March 2011 meeting at Devonshires with	08:39:06
23	Mr. Barden and Ms. Maxwell, correct, and you learned	08:39:12
24	about her at that meeting; is that correct?	08:39:16
25	A. Correct.	08:39:18

ROSS NEIL SUTHERLAND GOW

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1	remaining, so...	08:58:14
2	I've marked as Exhibit 3 RG(UK) 00002. Do you	08:58:15
3	recognize this email?	08:58:47
4	A. I do.	08:58:48
5	Q. Did you receive this email?	08:58:49
6	A. I did, on the -- on New Year's Day 2015.	08:58:50
7	Q. Did you contact Ms. Maxwell after receiving	08:58:57
8	this email?	08:58:58
9	A. I did.	08:58:59
10	Q. Did you make any response to Mr. Ball in any	08:59:19
11	form?	08:59:22
12	A. I did.	08:59:22
13	Q. Can you tell me what you -- what response you	08:59:25
14	made?	08:59:26
15	A. Well, the response to Mr. Ball was part of a	08:59:27
16	series of responses having spoken to my client within 24	08:59:33
17	hours or so, we got back to Mr. Ball with an agreed	08:59:41
18	statement which went out to a number of media.	08:59:44
19	Q. When you say "agreed statement" can you tell me	08:59:50
20	more about what you mean? Who agreed to the statement?	08:59:52
21	A. I need to give you some context, if I may,	08:59:58
22	about that statement.	09:00:01
23	So, this is on New Year's Day. I was	09:00:02
24	in France so the email time here of 21:46, in French	09:00:04
25	time was 22:46, and I was getting up early the next	09:00:10

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 32

1	morning to drive my family back from the south of	09:00:14
2	France to England, which is a 14-hour journey, door to	09:00:17
3	door. So on the morning of the 2nd of January,	09:00:22
4	bearing in mind that Ms. Maxwell, I think was in New	09:00:26
5	York then, she was five hours behind, so there was	09:00:28
6	quite a lot of, sort of time difference between the	09:00:30
7	various countries here, I sent her an email, I	09:00:35
8	believe, saying -- parsing this -- forwarding this	09:00:38
9	email to her saying "How do you wish to proceed?" And	09:00:41
10	then I was on the telephone -- I had two telephones in	09:00:45
11	the car, I received in excess of 30 phone calls from	09:00:50
12	various media outlets on the 2nd of January, all	09:00:54
13	asking for information about how Ms. Maxwell was	09:01:00
14	looking to respond to the latest court filings, which	09:01:04
15	were filed on the 30th of December as I understand.	09:01:10
16	And by close -- towards close of play	09:01:13
17	on the 2nd, I received an email forwarded by	09:01:16
18	Ms. Maxwell, containing a draft statement which my	09:01:33
19	understanding was the majority of which had been	09:01:36
20	drafted by Mr. Barden with a header along the lines of	09:01:39
21	"This is the agreed statement." At close of play on	09:01:44
22	the 2nd.	09:01:48
23	So I -- I was -- I had gone under the	09:01:50
24	Channel Tunnel and I was sitting on the other side and	09:01:54
25	that email, which my understanding was that it had	09:01:57

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 33

1	been signed off by the client, effectively, was then	09:02:01
2	sent out to a number of media, including Mr. Ball and	09:02:05
3	various other UK newspapers.	09:02:09
4	Q. Mr. Gow, when you say "end of play" and "close	09:02:12
5	of play," are you referring to sending the email that's	09:02:15
6	Exhibit 2?	09:02:18
7	A. Yes, I am.	09:02:24
8	MR. DYER: My understanding is that it went to	09:02:29
9	people other than those listed?	09:02:30
10	THE WITNESS: Yes, that is --	09:02:32
11	MR. DYER: Just a sample.	09:02:34
12	THE WITNESS: That is a sample. Everyone who	09:02:35
13	effectively -- well, the detail on this, I was driving,	09:02:37
14	so my eldest son in the back had my BlackBerry and was	09:02:40
15	trying to capture -- it was a pretty chaotic day.	09:02:43
16	Most people in the UK were on holiday. In fact,	09:02:48
17	it was a holiday weekend, our office was closed, my PA was	09:02:50
18	on holiday, so my son was basically doing an internship in	09:02:54
19	the back of the car, downloading the names of the callers	09:02:58
20	from various media outlets and -- so we had a list of	09:03:02
21	those so when I got to the car park, at the end of the	09:03:05
22	Eurotunnel thing in the UK, I had numerous names, so the	09:03:09
23	email went out to a wide range of people.	09:03:14
24	But the 30 or so calls I had is an aggregate	09:03:17
25	number, so there might have been five calls from the BBC	09:03:20

ROSS NEIL SUTHERLAND GOW 11/18/2016

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1	10 more seconds.	09:19:50
2	MS. SCHULTZ: Understood, and I apologize.	09:19:52
3	MR. SPEARMAN: This is what, Exhibit 9?	09:19:54
4	MR. DYER: Yes.	09:19:56
5	MS. SCHULTZ: Yes.	09:19:56
6	(Exhibit 9 was marked for identification.)	09:19:56
7	BY MS. SCHULTZ:	09:20:01
8	Q. This also appears to be an email chain with you	09:20:02
9	and Ms. Maxwell; is that correct?	09:20:05
10	A. It does appear to be so.	09:20:07
11	Q. Did you send the top email of the chain that	09:20:08
12	says "Okay, G, going with this"?	09:20:10
13	A. I did.	09:20:13
14	Q. And did you receive from Ms. Maxwell, the	09:20:14
15	bottom email of that chain?	09:20:16
16	A. I believe so. Well, I believe -- yes, yeah, it	09:20:17
17	was forwarded from Ms. Maxwell, yes.	09:20:21
18	MR. DYER: Sorry, I don't quite understand that	09:20:29
19	answer.	09:20:31
20	THE WITNESS: I misspoke that. I did receive	09:20:33
21	it from Ms. Maxwell.	09:20:34
22	MR. DYER: Okay.	09:20:38
23	BY MS. SCHULTZ:	09:20:38
24	Q. The subject line does have "FW" which to me	09:20:39
25	indicates it's a forward. Do you know where the rest of	09:20:42

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1	this email chain is?	09:20:45
2	A. My understanding of this is: It was a holiday	09:20:49
3	in the UK, but Mr. Barden was not necessarily accessible,	09:20:54
4	at some point in time, so this had been sent to him	09:20:59
5	originally by Ms. Maxwell, and because he was	09:21:03
6	unavailable, she forwarded it to me for immediate action.	09:21:07
7	I therefore respond, "Okay, Ghislaine, I'll go with	09:21:14
8	this."	09:21:19
9	It is my understanding that this is	09:21:20
10	the agreed statement because the subject of the second	09:21:22
11	one is "Urgent, this is the statement" so I take that	09:21:24
12	as an instruction to send it out, as a positive	09:21:27
13	command: "This is the statement."	09:21:30
14	Q. Okay.	09:21:33
15	A. And I say, "Thanks, Philip" because I'm aware	09:21:33
16	of the fact that he had a hand, a considerable hand in	09:21:37
17	the drafting.	09:21:40
18	Q. Okay. Could I ask you to please refer back to	09:21:41
19	Exhibit 2. Looking also at Exhibit 9, Exhibit 9 appears	09:21:47
20	to have five sentences in it. Do you agree that those	09:22:03
21	same five sentences are part of the communication that is	09:22:10
22	borne in Exhibit 2?	09:22:13
23	A. Sorry, could you say that again. I'm just	09:22:18
24	following what your --	09:22:20
25	Q. It was a bad question. Let me try that again.	09:22:21

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1	Q. Okay. Have you ever communicated anything	09:54:42
2	regarding Ms. Guiffre's criminal allegations to the press	09:54:52
3	or the media?	09:54:56
4	A. As part of a wider conversation about her	09:54:58
5	unsavory allegations about Ms. Maxwell, it's possible	09:55:04
6	that I might have done, but I can't recall the detail,	09:55:08
7	I'm afraid.	09:55:11
8	Q. Do you -- do you remember discussing that with	09:55:12
9	The Guardian?	09:55:20
10	A. No, I don't. I'm not saying I didn't but I	09:55:26
11	can't recall. You have to bear in mind, if you'd be so	09:55:29
12	kind, that I've been speaking to over 30 journalists and	09:55:34
13	media outlets about this, and I can't recall every single	09:55:39
14	-- the detail of every single conversation.	09:55:41
15	Q. Earlier you testified with regard to Exhibit 2	09:55:44
16	that in the days following sending that email, you also	09:55:47
17	communicated with other press and media outlets. Do you	09:55:53
18	recall today any of the other press and media outlets you	09:55:58
19	communicated with, in addition to those listed at the top	09:56:02
20	of that email?	09:56:07
21	A. The Guardian, The Sun, from the top of my	09:56:07
22	memory, but in addition to -- in addition to emails there	09:56:14
23	would have been telephone calls and I'm -- there may not	09:56:21
24	be a transcript of those calls, these are emails inter	09:56:25
25	alia, others, and I can't recall every single email that	09:56:33

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1	from John Swain?	09:58:42
2	A. I believe I did.	09:58:44
3	Q. That's all the questions I have about that	09:58:49
4	document.	09:58:51
5	A. Thank you.	09:58:52
6	Q. Regarding communications you made after sending	09:59:05
7	the email in Exhibit 2, I believe, and please correct me	09:59:08
8	if I'm wrong, you testified that you received 30 or more	09:59:14
9	calls that were -- that you would classify as press	09:59:17
10	inquiries regarding Ms. Guiffre; is that correct?	09:59:20
11	A. Yes.	09:59:23
12	Q. Do you recall emailing the statement to other	09:59:24
13	entities beyond what is on the list on Exhibit 2?	09:59:29
14	A. Yes, I think I answered that previously. Yes,	09:59:33
15	I mean there is a far -- I said inter alia, so there is a	09:59:36
16	wider range of people that I would have emailed it to in	09:59:40
17	response to incoming queries --	09:59:43
18	Q. Do you --	09:59:46
19	A. But I --	09:59:46
20	Q. Sorry.	09:59:47
21	A. I can't remember every single one.	09:59:48
22	Q. Do you recall ever reading the statement to the	09:59:50
23	press or the media over the phone?	09:59:52
24	A. It's very possible that I would have done so,	09:59:56
25	yes.	09:59:57

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1	MR. DYER: Do you mean Exhibit 2?	09:59:58
2	MS. SCHULTZ: Yes. Exhibit 2.	10:00:00
3	THE WITNESS: To be clear, Exhibit 2 was the	10:00:02
4	base document.	10:00:03
5	MS. SCHULTZ: Uh-hmm.	10:00:05
6	THE WITNESS: In addition to the 2011 March	10:00:05
7	statement. Those were the two working documents that	10:00:10
8	were always referred to, both of which -- well, the first	10:00:15
9	one was in a public domain and was on record on the	10:00:17
10	Devonshires -- on -- with Devonshires name at the top on	10:00:21
11	PR Newswire which is a global delivery service. So that	10:00:24
12	was easily accessible by people. And the second one was	10:00:28
13	the -- further to the 2nd of January 2015.	10:00:31
14	BY MS. SCHULTZ:	10:00:38
15	Q. To the extent you can recall or could estimate,	10:00:37
16	how many other emails do you believe you sent bearing	10:00:40
17	that statement that's in Exhibit 2?	10:00:43
18	A. I really can't remember but certainly more than	10:00:47
19	six and probably less than 30, somewhere in between.	10:00:48
20	Any time there was an incoming query	10:00:52
21	it was either dealt with on the telephone by referring	10:00:54
22	them back to the two statements of March 2011 and	10:00:57
23	January 2015 or someone would email them the	10:01:00
24	statement. So no one was left unanswered, broadly, is	10:01:06
25	the -- is where we were. But I can't remember every	10:01:09