

1           Q     When you got the apartment in Oakland Park, you  
2 got it with Virginia?

3           A     Well, yeah. She was living with us -- and  
4 Mario.

5           MS. MENNINGER: All right. I think that's  
6 all I have.

7           MR. EDWARDS: Okay.

8           THE VIDEOGRAPHER: We're going off the  
9 record. This concludes disc one, volume one of  
10 the video-deposition of James Michael Austrich.  
11 We're going off the record. The time is  
12 approximately 11:20 a.m.

13           (Break taken.)

14           THE VIDEOGRAPHER: We're back on the record  
15 with disc two, volume one, of the video-  
16 deposition of James Michael Austrich. And the  
17 time is approximately 11:23 a.m. Thank you.

18                       CROSS-EXAMINATION

19 BY MR. EDWARDS:

20           Q     Mr. Austrich, as you know, my name is Brad  
21 Edwards, and I represent Virginia.

22           A     Yes.

23           Q     I'm going to ask you some follow-up questions to  
24 the questions that you were asked previously.

25                       All right?

1 how long we lived there.

2 Q Okay. At some point in time, though, while  
3 you're living on her parent's property, it becomes 1999?

4 A Yeah, I believe.

5 Q Okay. And so when you started living at her  
6 parent's property, you're 18, she's 15, but at some point  
7 in time you turn 19 and she turned 16?

8 A Yes.

9 Q Okay. And at some other point in time, she  
10 leaves the job at the pet store?

11 A Pet store, yeah.

12 Q And goes to work at the Mar-a-Lago?

13 A Yes. At Donald Trump's country club, yeah.

14 Q Okay. Donald Trump's country club is called the  
15 Mar-a-Lago?

16 MS. MENNINGER: Objection.

17 THE WITNESS: Yeah, that's what I always  
18 remember it as. Yes.

19 BY MR. EDWARDS:

20 Q Is that right?

21 MS. MENNINGER: Objection, leading. I do get  
22 a chance to object. Leading.

23 BY MR. EDWARDS:

24 Q When you used the term "Mar-a-Lago" and used the  
25 term "Donald Trump's country club," are we talking about

1           A     But if she had to get clean for her job, she  
2 would have gotten clean for the job.

3           Q     Okay. Do you remember her being hired as a  
4 bathroom attendant there, a locker room attendant?

5           A     Now that you're saying that, some kind of  
6 attendant sounds familiar. But I don't really remember.  
7 All I remember is for the massage. As a -- I don't  
8 remember exactly what she got hired for at Donald Trump's  
9 place. But I just remember the masseuse thing.

10                  But as you're saying "the attendant," the  
11 attendant sounds familiar because I doubt her father would  
12 hire her as a massage therapist without knowing anything.

13           Q     So you had known her for some period of time  
14 before she gets this job at the Mar-a-Lago, right?

15           A     Right.

16           Q     Did she have any massage therapy training  
17 whatsoever?

18           A     No.

19           Q     Ever given a massage to anyone?

20           A     Not that I remember.

21           Q     Ever given a massage to you?

22           A     Not until she was already doing the massage  
23 stuff. But, no, I don't remember any kind of massage  
24 training or even like an inkling for it.

25           Q     Okay. Then when she goes to work for

1 Mar-a-Lago, you don't remember, I think is the words you  
2 used, whether she worked there for weeks or months?

3 A Yes.

4 Q You don't remember?

5 A No, not at all.

6 Q And at the time when she gets the job at the  
7 Mar-a-Lago, do you remember where you were working, if  
8 anywhere?

9 A No. I mean, I think at that time, I was working  
10 at one of the places. But I don't really remember where.

11 Q And then, and I believe that you used this word,  
12 correct me if I'm wrong, she's recruited to work for Jeff?

13 A Yes.

14 Q And do you remember her telling you that it was  
15 an assistant or somebody associated with Jeff that  
16 recruited her to work with Jeff?

17 MS. MENNINGER: Objection, leading.

18 THE WITNESS: I don't remember.

19 MS. MENNINGER: Misstates the testimony.

20 THE WITNESS: Sorry. I don't remember. All  
21 I remember was that somebody got her from there to  
22 Jeff.

23 MR. EDWARDS: Got it.

24 BY MR. EDWARDS:

25

1 Q Then there's months; November, December.

2 A So this is the year 2000, and these are the  
3 months?

4 MS. MENNINGER: Objection to this entire line  
5 of questioning. The witness has no foundation for  
6 talking about this particular document.

7 BY MR. EDWARDS:

8 Q Okay. So do you know how long that -- as you  
9 sit here today, do you remember how long Virginia had been  
10 going over to Jeff's house before she started traveling on  
11 an airplane with him?

12 MS. MENNINGER: Objection, foundation.

13 THE WITNESS: No.

14 BY MR. EDWARDS:

15 Q It could be months, it could be a year?

16 MS. MENNINGER: Objection, foundation.

17 THE WITNESS: I don't think it -- I don't  
18 think she was there for very long without doing  
19 traveling.

20 BY MR. EDWARDS:

21 Q But in your mind, you can't tell me how long  
22 "very long" is?

23 A No, I mean, I don't.

24 Q Okay. And is there anything that would tell you  
25 the year or the month in which you remember Virginia first

1 going over to Jeff's house?

2 A Not really.

3 Q There's nothing I could really show you in this  
4 world that would remind you right now?

5 A No.

6 Q Okay. Before going over to work with Jeff, did  
7 Virginia have any massage experience?

8 A No.

9 Q When -- I think you said with respect to  
10 "bringing other girls, that sounds familiar," what other  
11 girls do you remember her bringing? Do you remember their  
12 names?

13 A I don't remember names.

14 MS. MENNINGER: Objection, foundation.

15 BY MR. EDWARDS:

16 Q Did you ever drive any of the other girls over  
17 to Jeff's house?

18 A I don't think so.

19 Q Okay. How many times did you to to Jeff's  
20 house?

21 A A few times. Like, I think I went -- I think I  
22 dropped her off and somebody always brought her back. I  
23 don't really remember picking her up too much.

24 Q Okay. And in the beginning, she was telling you  
25 that she was performing massages?

1           A     Yeah, something like that.

2           Q     Do you know what time of year?

3           A     No.

4           Q     Do you know whether the spa at Mar-a-Lago closes  
5 during the summers?

6                     MR. EDWARDS:   Form.

7                     THE WITNESS:   No, I have no idea.

8   BY MS. MENNINGER:

9           Q     You don't know how she got the job with Jeff?

10          A     No. I know somebody -- somebody -- like,  
11 that's why I said "recruited" -- that's the only word I  
12 can think of -- that worked for Jeff.

13          Q     Why do you use the word "recruited"?

14          A     Because that's the only word -- I don't know,  
15 football or everything. That's the only word I can think  
16 of, you recruit somebody.

17          Q     Hired her?

18          A     Yeah, I guess. It was -- it was just a very  
19 fast thing.

20          Q     You don't know who that person was?

21          A     No.

22          Q     You don't know what she said to that person?

23          A     No.

24          Q     You don't know what that person said to her?

25          A     Nope.

1 Q Do you remember her coming home and saying "I  
2 got a job with Jeff"?

3 A I remember she said she got a job with Jeff.

4 Q Did she tell about that job?

5 A I think it was -- I think at the time it was for  
6 massage therapy, like, she was going to be a masseuse.

7 Q And she was excited about it?

8 A Yeah.

9 Q She wasn't sad about it?

10 A Not that I remember. But I really don't  
11 remember much from back then.

12 Q She wasn't crying when she came home and said "I  
13 just got a job with Jeff," right?

14 A No.

15 Q You're guessing that you -- she got the job with  
16 Jeff before you moved into the Bent Oak apartment, but you  
17 don't know. Correct?

18 MR. EDWARDS: Form

19 THE WITNESS: Yes. But I would think we  
20 would have had to have had the money by then. So  
21 that was the only time she was making real good  
22 money.

23 BY MS. MENNINGER:

24 Q And do you know how much that apartment cost?

25 A I know it was expensive.



## 1 C E R T I F I C A T E

2 STATE OF FLORIDA

3 COUNTY OF MARION

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

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

16 WITNESS MY HAND this \_\_\_\_ day of June, 2016, at  
17 Ocala, Marion County, Florida.

18

19

20

21

22

23

24

25

\_\_\_\_\_  
Karla Layfield, RMR  
Stenographic Court Reporter

# EXHIBIT 3

(Filed Under Seal)

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

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,  
Plaintiff,  
-against-  
GHISLAINE MAXWELL,  
Defendant.

\_\_\_\_\_/

250 N. Australian Avenue,  
Suite 1400  
West Palm Beach, Florida 33401  
Friday, September 9, 2016  
8:35 a.m. - 2:08 p.m.

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

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Taken before Darline M. West,  
Registered Professional Reporter, Notary Public  
in and for the State of Florida At Large,  
pursuant to Notice of Taking Deposition filed  
by the Plaintiff in the above cause.

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

(866) 624-6221

1 J. Epstein - Confidential

2 BY MR. CASSELL:

3 Q. Isn't it true that Maxwell led Virginia up  
4 to your Palm Beach mansion massage room the first  
5 time you met her?

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

8 THE WITNESS: Fifth.

9 BY MR. CASSELL:

10 Q. You saw Maxwell bringing Virginia up to  
11 your room, true, sir?

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

14 THE WITNESS: Fifth.

15 BY MR. CASSELL:

16 Q. Isn't it true that it was standard  
17 operating procedure for Maxwell to bring underage  
18 girls up to your room?

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

21 THE WITNESS: Fifth.

22 BY MR. CASSELL:

23 Q. Isn't it true that it was standard  
24 operating procedure for Maxwell to bring underage  
25 girls up to your room for you to sexually abuse?

1 J. Epstein - Confidential

2 THE WITNESS: Fifth.

3 BY MR. CASSELL:

4 Q. In 2000, Virginia was approached by  
5 Maxwell, true?

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

8 THE WITNESS: Fifth.

9 BY MR. CASSELL:

10 Q. Maxwell was one of the main women whom you  
11 used to procure underage girls for sexual activities,  
12 true?

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

15 THE WITNESS: Fifth.

16 BY MR. CASSELL:

17 Q. It was your understanding that Maxwell met  
18 Virginia at the Mar-a-Lago Club in Palm Beach in  
19 2000, true?

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

22 THE WITNESS: Fifth.

23 BY MR. CASSELL:

24 Q. In 2000, you were a member of the  
25 Mar-a-Lago Club, true?

1 J. Epstein - Confidential

2 MR. PAGLIUCA: Object to form.

3 THE WITNESS: Fifth.

4 BY MR. CASSELL:

5 Q. In 2000, Ms. Maxwell had access to the  
6 Mar-a-Lago Club, true?

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

9 THE WITNESS: Fifth.

10 BY MR. CASSELL:

11 Q. The reason Maxwell had access to the  
12 Mar-a-Lago Club in 2000 was because of your  
13 connections to the club, true?

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

16 THE WITNESS: Fifth.

17 BY MR. CASSELL:

18 Q. Maxwell was a primary co-conspirator in  
19 your sexual abuse scheme, true?

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

22 THE WITNESS: Fifth.

23 BY MR. CASSELL:

24 Q. Maxwell was a primary co-conspirator in  
25 your sex trafficking scheme, true?

1 J. Epstein - Confidential

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

4 THE WITNESS: Fifth.

5 BY MR. CASSELL:

6 Q. Maxwell herself regularly participated in  
7 your sexual exploitation of minors, true?

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

10 THE WITNESS: Fifth.

11 BY MR. CASSELL:

12 Q. In 2000, Maxwell herself regularly  
13 participated in your sexual exploitation of minors,  
14 true?

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

17 THE WITNESS: Fifth.

18 BY MR. CASSELL:

19 Q. Maxwell herself regularly participated in  
20 your sexual exploitation of Virginia, true?

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

23 THE WITNESS: Fifth.

24 BY MR. CASSELL:

25 Q. Did Maxwell participate in your sexual

1 REPORTER'S CERTIFICATE

2

STATE OF FLORIDA

3 COUNTY OF PALM BEACH

4

5 I, DARLINE MARIE WEST, RPR, certify that I was  
6 authorized to and did stenographically report the  
7 foregoing deposition; and that the transcript is a  
8 true record thereof.

9

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

16

17 Dated this 13th day of September 2016.

18

19

20

21

22

\_\_\_\_\_  
DARLINE MARIE WEST, RPR

23

24

25



# EXHIBIT 4

(Filed Under Seal)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,  
Plaintiff,

v.

GHISLAINE MAXWELL,  
Defendant.

\_\_\_\_\_/

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

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

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

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

1 Q Right?

2 A Yeah.

3 Q And she travelled the world?

4 A Uh-huh (affirmative). Yes.

5 Q Did JJ say there was anything weird about  
6 her job?

7 A No.

8 MR. EDWARDS: Object to the form.

9 BY MS. MENNINGER:

10 Q Did you know whether she had any massage  
11 training?

12 A I did not. Like I said, the past three --  
13 three or four years before then, I had no contact  
14 with her whatsoever. So I had no clue what she was  
15 certified in or had done with her life.

16 Q Okay. I would like to take about a five-  
17 or ten-minute break, if that's okay with you.

18 A That's fine.

19 THE VIDEOGRAPHER: The time is 10:13. We  
20 are off the record.

21 The time is 10:27. We are back on the  
22 record.

23 MS. MENNINGER: All right. I would like  
24 to mark as an exhibit now Defendant's  
25 Exhibit 4.

1       certain times and stuff. And it would just -- you  
2       know, it just did not make sense to me that it it  
3       was just a masseuse, you know. Like I said, he's a  
4       billionaire. You can afford another masseuse. Why  
5       do you need her, you know.

6           Q     Do you know whether he --

7           (Brief interruption.)

8           A     Let me turn this down.

9           Q     Sorry.

10          A     I'm sorry.

11          (Briefly off the record.)

12          Q     Do you know whether he had other masseuses  
13       at the time?

14          A     I -- I really don't know. All I know is  
15       he would have Virginia, obviously, go out and look  
16       for other girls, also, to bring back, as well.

17          Q     And how do you know that?

18          A     Because she had explained to me that  
19       sometimes when she would go out on trips that her  
20       and Ms. Maxwell and stuff would go out to, like,  
21       clubs and stuff and just try and pick up girls to  
22       bring back, so...

23          Q     That's what Virginia told you?

24          A     Yes.

25          Q     All right. Did any of your information --

1 (Brief interruption.)

2 A I thought I muted it.

3 Q Did any of your information come from  
4 anywhere other than Virginia?

5 A No.

6 MR. EDWARDS: Object to the form.

7 A Like I said, I did not talk -- I did not  
8 really speak to any of them other than, you know,  
9 hi, how's it going and stuff like that, until I had  
10 actually met Jeffrey. And then he was the only one  
11 I ever really spoke with. I had met Ms. Maxwell a  
12 couple of times, but it was never, like, you know,  
13 actual conversations, so...

14 BY MS. MENNINGER:

15 Q All right. Well, let me -- when did you  
16 meet Jeffrey?

17 A I'd probably say -- probably a few months  
18 after I had moved in with her.

19 Q Okay. And how did you come to meet  
20 Jeffrey?

21 A Dropping her off over at his mansion.

22 Q And did you drop her off using her car?

23 A Yes.

24 Q And so she just asked you: Can you take  
25 me over there?

1           A     Yeah.

2           Q     And did she tell you where to go?

3           A     Yeah. She told where he lived and  
4 everything. And then obviously I got to take the  
5 car, because she was going somewhere else in the  
6 world and did not need it, so...

7           Q     You were dropping her off for a multi-day  
8 trip?

9           A     Yeah. She would normally go about two  
10 weeks out of every month, so...

11          Q     Two weeks straight?

12          A     Yeah. It was two weeks home and two weeks  
13 gone, basically.

14          Q     Did you always take her to his house,  
15 or...

16          A     Yeah. Pretty much every time I took her  
17 there, it was always to his mansion. I picked her  
18 up one time -- maybe it was a couple of times --  
19 from the jet stream place. But pretty much every  
20 single time it was at the hou- -- at the mansion.

21               (Brief interruption.)

22          Q     Okay. So you're -- is that your phone?  
23 I'm --

24          A     No, it is. I thought I muted it.

25          Q     That's okay.

1        talking like that, so...

2            Q        Okay. Where did your first conversation  
3        with Jeffrey take place?

4            A        I'm pretty sure it was in the kitchen or  
5        the living room.

6            Q        Inside the house?

7            A        Yeah, it was inside the house. I've never  
8        seen him anywhere else other than in the mansion or  
9        getting off the jet.

10          Q        So you were allowed to go inside the  
11        house --

12          A        Yeah.

13          Q        -- with Ms. Roberts?

14          A        Yeah. But I never went upstairs. I've  
15        only been in the kitchen, the living room, and by  
16        the pool.

17          Q        How many times would you estimate that you  
18        had been over to the house?

19          A        I mean, at least once every two weeks to  
20        drop her off, you know.

21          Q        Was there a period of time between 2001  
22        and when she left in 2002 where she was not working  
23        for Jeffrey?

24          A        Yes.

25          Q        What period of time was that?

1           A     It was pretty much, like, when she was  
2           actually working as a server. Like, basically  
3           because we were trying to not have her go back  
4           there. Like, she did not want to go back there.  
5           And we were trying to just work without needing his  
6           money, you know.

7           Q     All right. And if I can re-call up that  
8           Exhibit 2, can you see from here when about she was  
9           working as a server?

10          A     March 4th, '02.

11          Q     Do you know about how long she worked  
12          there?

13          A     I do not. I'm not sure.

14          Q     Days? Weeks? Months? Anything?

15          A     I really have no clue.

16          Q     Okay. How old was Ms. Roberts in 2002, if  
17          you know?

18          A     I'd probably say, like, 18 or so, maybe.

19          Q     If her birthday is in '83 --

20          A     Oh, if it's in '83, then I'd say --  
21          because I was born in '82, so a year younger than me  
22          would be...

23          Q     18, 19?

24          A     Yeah, somewhere around there.

25               MR. EDWARDS: Object to the form.



1           Q     I guess my question is: Did she ever tell  
2     you that she had started as a regular masseuse for  
3     him and then transitioned to something other than a  
4     masseuse?

5           A     No. She never said that it transitioned.  
6     But she ended up explaining to me what had happened  
7     before, so...

8           Q     What has -- what is that?

9           A     That her and Ms. Maxwell and Jeffrey would  
10    obviously be doing stuff, all three of them  
11    together. Like I said, that they would all go out  
12    to clubs to pick up girls and try and find them to  
13    bring back for Jeffrey. And then she told me about  
14    how, like I said, her and Ms. Maxwell and Jeffrey  
15    were all intimate together on multiple occasions.

16          Q     When did she tell you this?

17          A     I'm not exactly sure on the dates.

18          Q     Was it while you were still together?

19          A     Yes.

20          Q     Did you -- had you met Ms. Maxwell?

21          A     Yeah, I had met her a couple of times.

22          Q     When did you meet Ms. Maxwell?

23          A     Dates, I'm unsure of. But it was pretty  
24    much, like I said, at Jeffrey's house in the  
25    kitchen.

1           Q     Was it earlier in the time you were with  
2     her, or...

3           A     It was about -- I'd say about six months  
4     or so. I don't know. I'm not exactly positive.

5           Q     All right. So at the time you met  
6     Ms. Maxwell, had Ms. Roberts already told you that  
7     she had been intimate?

8           A     No. She had told me about that, I  
9     believe, after I had max- -- after I had already met  
10    her.

11          Q     Okay. And tell me everything that you  
12    remember about what Ms. Roberts said about being  
13    intimate with Ms. Maxwell and Mr. Epstein at the  
14    same time.

15          A     I remember her talking about, like,  
16    strap-ons and stuff like that. But, I mean, like I  
17    said, all the details are not really that clear.  
18    But I remember her talking about, like, how they  
19    would always be using and stuff like that.

20          Q     She and Ms. Maxwell and Mr Epstein would  
21    used strap-ons?

22          A     Uh-huh (affirmative).

23          Q     How did you feel about that?

24          A     I just -- obviously not happy about it.

25          Q     What did you say?

1           A     I did not.

2           Q     When the FBI interviewed you, did you  
3 mention this to them?

4           A     I mentioned -- anything they asked me, I  
5 did not hold anything back.

6           Q     Okay. Do you recall specifically talking  
7 about sex with the Prince?

8           A     I -- I don't recall talking to them about  
9 that, but, I mean, it's -- it could be possible.

10          Q     Other than sex with the Prince, is there  
11 anyone else that Jeffrey wanted Ms. Roberts to have  
12 sex with that she relayed to you?

13          A     Mainly, like I said, just Ms. Maxwell and  
14 all the other girls.

15          Q     Ms. Maxwell wanted -- Jeffrey wanted  
16 Virginia to have sex with Ms. Maxwell?

17          A     And him, yeah.

18          Q     And did she tell you whether she had ever  
19 done that?

20          A     Yeah. She said that she did.

21          Q     And when did she tell you that?

22          A     I'm not sure on the date.

23          Q     And what did she describe having happened?

24          A     I believe I already told you that. With  
25 the strap-ons and dildos and everything.

CERTIFICATE OF REPORTER

STATE OF FLORIDA       )  
                                  )  
COUNTY OF VOLUSIA     )

I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 5th day of July, 2016.

---

Leanne W. Fitzgerald, FPR  
Florida Professional Reporter

Digital Certificate Authenticated  
By Symantec

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,  
Plaintiff,

v.

GHISLAINE MAXWELL,  
Defendant.

\_\_\_\_\_/

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 2 of 2

Pages 158 - 258

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

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

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

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

1           A     Yes.

2           Q     All right. And that belief was based on  
3     Virginia telling you that?

4           A     And JJ and Michael.

5           Q     Okay. So you had heard from some other  
6     people, and then later --

7           A     Yeah. Before she had come back to the  
8     apartment, they said that she was a masseuse for  
9     this guy. And then when she came back, she told me.

10          Q     All right. Once you started dating her  
11     again -- I'm sorry.

12                 Prior to dating her. Go back to the first  
13     time you were dating her. Did she have money?

14          A     No.

15          Q     All right. Was she able to afford her own  
16     place?

17          A     No.

18          Q     Was she doing massages, at all?

19          A     No.

20          Q     All right. Fast forward to the second  
21     time when you get back together with her sometime in  
22     2001.

23          A     Uh-huh (affirmative).

24          Q     Did she appear to you to have any massage  
25     training?

1 A No.

2 Q As a seventeen-year-old at that time, was  
3 she able to afford things?

4 MS. MENNINGER: Objection. Form.  
5 Foundation.

6 BY MR. EDWARDS:

7 Q Did she have money --

8 A She had money.

9 Q -- while working with Jeff?

10 And was the money in the form of cash?

11 A Yes.

12 Q And did she always have cash?

13 A Yes.

14 Q And how was the apartment paid for?

15 MS. MENNINGER: Objection. Form.  
16 Foundation.

17 A Cash.

18 BY MR. EDWARDS:

19 Q And did you see how she was paying for the  
20 apartment?

21 A I did not watch her pay the bill, but...

22 Q Okay. When you would go to dinner, who  
23 would pay?

24 A Just whoever.

25 MS. MENNINGER: Objection. Form.

1 MS. MENNINGER: Objection. Form.

2 Foundation.

3 A For Jeffrey.

4 BY MR. EDWARDS:

5 Q All right. Let me fix this. Ghislaine --  
6 when Ghislaine Maxwell would call you during the  
7 time that you were living with Virginia, she would  
8 ask you what, specifically?

9 MS. MENNINGER: Objection. Form.  
10 Foundation.

11 A Just if I had found any other girls just  
12 to bring to Jeffrey.

13 BY MR. EDWARDS:

14 Q Okay.

15 A Pretty much every time there was a  
16 conversation with any of them, it was either asking  
17 Virginia where she was at, or asking her to get  
18 girls, or asking me to get girls.

19 Q All right. Let's go to that second  
20 category you just identified, which is asking  
21 Virginia to get girls. How many times were you in a  
22 room where specifically Ghislaine Maxwell would ask  
23 Virginia to bring girls?

24 A None that I can recall.

25 Q Okay. How many times -- when you say they



1       went with Virginia, and you dropped her off; and  
2       some occasions you went inside?

3             A       Yeah.

4             Q       And some of the occasions you went inside,  
5       you hung out by the pool?

6             A       Yes.

7             Q       Or in the kitchen with the chef?

8             A       Yeah.

9             Q       All right. And in the total of all the  
10       times that you went inside the house, you saw  
11       Ms. Maxwell -- I think you got up to six times?

12            A       Yeah, about five or six times.

13            Q       All right. Total?

14            A       Total.

15            Q       That's not five or six times where --

16            A       That was period, all together.

17            Q       -- you brought girls?

18            A       No. All together, period.

19            Q       All right. I thought you said when I was  
20       asking you questions that Ms. Maxwell never asked  
21       you to bring girls.

22            A       I don't remember saying that.

23            Q       Okay. Well, tell me. When did  
24       Ms. Maxwell ask you to bring a girl?

25            A       Never in person. It was, like, literally,

1       like, on the phone maybe, like, once or twice.

2               Q     All right. Did Ms. Maxwell call you  
3 frequently?

4               A     No.

5               Q     All right. How many times do you think  
6 Ms. Maxwell called you, at all?

7               A     I'd just say that probably a just a few, a  
8 couple of times. Maybe once or twice.

9               Q     One or two --

10              A     The majority of the time it was pretty  
11 much his assistant.

12              Q     How do you know Ms. Maxwell's voice?

13              A     Because she sounds British.

14              Q     So someone with a British accent called  
15 you once or twice and asked for --

16              A     Well, she told me who she was.

17              Q     Okay. And what did she say when she  
18 called you and asked you to bring girls?

19              A     She just said, "Hi. This is Ghislaine.  
20 Jeffrey was wondering if you had anybody that could  
21 come over."

22              Q     Okay. When did that happen?

23              A     I'm not exactly sure on the time frame.

24              Q     Was it after the Roadhouse Grill or  
25 before?

1           Q     So the thing that Virginia was tired of --  
2     just so that the record is clear -- well, I'll let  
3     you answer in your words. Just be clear.

4                     What was it that Virginia was trying to  
5     get away from and stop with respect to working at  
6     Jeffrey Epstein's house?

7           MS. MENNINGER: Objection. Form,  
8             foundation -- as to Virginia's thought  
9             processes.

10          A     To stop being used and abused.

11   BY MS. MENNINGER:

12          Q     How do you know that?

13                     MS. MENNINGER: Objection. Form.  
14             Foundation.

15          A     Due to all the things that I have come  
16     to -- that have been brought to light, and in the  
17     experiences that I've had, and the conversations  
18     that I have had with her. Like, it just all adds up  
19     to that, so...

20   BY MS. MENNINGER:

21          Q     When Virginia was wanting to get out, did  
22     she ever express that it was the times of work that  
23     she was trying to get away from?

24          A     No.

25          Q     Okay. What was she specifically

1           Q     Was she getting paid as much as she was  
2     getting paid to work for Jeff Epstein?

3           A     Definitely not.

4           Q     She no longer had cash all around?

5           A     Nope.

6           Q     You mentioned that there was -- you had  
7     several conversations with Virginia when she was  
8     discussing them wanting -- or I think the word you  
9     used was force, but later we tried to clarify that,  
10    but them forcing her to have sex with Prince Andrew.  
11    Do you remember that?

12          A     Yeah.

13          Q     And that you expressed that you were  
14    worried for her safety if she were to decline that?

15          A     Yes.

16          Q     What about your conversation with Virginia  
17    on that particular occasion made you worried for  
18    Virginia's safety?

19          A     Just the way she was talking to me. Like,  
20    she just sounded scared.

21          Q     And what -- what -- try to dig back and  
22    remember what exactly she was saying and how she was  
23    saying it, if you could just describe that for us.

24          A     She said that she went to go in -- I  
25    remember at one time she was talking to me about how

## 1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA )  
3 )  
4 COUNTY OF VOLUSIA )

5  
6  
7 I, Leanne W. Fitzgerald, Court Reporter, do  
8 hereby certify that I was authorized to and did  
9 stenographically report the deposition of TONY  
FIGUEROA; and that the foregoing transcript is a  
true record of my stenographic notes.

10 I further certify that I am not a relative,  
11 employee, attorney, or counsel of any of the  
12 parties, nor am I a relative or employee of any of  
the parties' attorneys or counsel connected with the  
action, nor am I financially interested in the  
action.

13 Dated this 5th day of July, 2016.  
14  
15  
16  
17  
18  
19

20 \_\_\_\_\_  
Leanne W. Fitzgerald, FPR  
Florida Professional Reporter

21 Digital Certificate Authenticated  
22 By Symantec  
23  
24  
25

# EXHIBIT 5

(Filed Under Seal)

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***VIRGINIA GIUFFRE***

*05/03/2016*

---

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

*216 16th Street, Suite 600*

*Denver Colorado, 80202*

*303-296-0017*

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

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF  
VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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

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

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6 Appearing on behalf of the  
Defendant

7 Also Present:

8 Brenda Rodriguez, Paralegal

Nicholas F. Borgia, CLVS Videographer

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1       you don't.

2                   Do you have any reason to believe that any  
3       of your previous sworn statements that you have made  
4       are not true?

5           A       No.

6                   MR. EDWARDS: I just object and ask that  
7       if we're going to ask the witness questions about any  
8       of her statements in whole or in part that the  
9       witness be allowed to see the statement, review the  
10      statement and then answer your questions.

11          Q       (BY MS. MENNINGER) You may answer the  
12      question.

13          A       Can you reask the question? I'm sorry.

14          Q       Do you have any reason to believe that any  
15      of your prior sworn statements are untrue?

16          A       I have no reason to believe that my prior  
17      statements are untrue.

18          Q       Has anyone told you to say something that  
19      was not true in connection with this case?

20          A       No, ma'am.

21          Q       All right. I'd like to start with a  
22      lawsuit that you filed under the caption Jane Doe  
23      versus Jeffrey Epstein.

24                   Do you recall that lawsuit?

25          A       I believe so.

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1 (Exhibit 1 marked.)

2 Q (BY MS. MENNINGER) I'm going to show you  
3 an exhibit that we are marking as Defendant's  
4 Exhibit 1.

5 MR. EDWARDS: Can I see that for a second?

6 I'd just like to make an objection on the  
7 record for the misidentification of this document.

8 While there was a lawsuit filed under the  
9 style of Jane Doe versus Jeffrey Epstein, Jane Doe  
10 was not Virginia Giuffre. And the lawsuit that's now  
11 being handed to this witness is Jane Doe 102 versus  
12 Jeffrey Epstein.

13 Is that the document we're talking about?

14 MS. MENNINGER: Counsel, if you have an  
15 objection, you should state the basis for your  
16 objection in a non-leading, non-suggestive manner.

17 If you have any other record to make, you  
18 can do so in a pleading filed with the Court.

19 MR. EDWARDS: Sure. My objection is  
20 you've misrepresented what you've handed the witness.  
21 I want to make sure that the witness is holding what  
22 you actually want her to be holding as opposed to the  
23 lawsuit you said that you were going to hand her.

24 That's it.

25 MS. MENNINGER: Counsel, I will ask the

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1 January 19th, 2015?

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

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

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

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

8 A The 19th day of January, 2015.

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

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

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

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

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

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

23 A On the first page.

24 Q Okay.

25 A Yes.

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

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

4 MR. EDWARDS: Answer again.

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

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

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

16 A I would say it was mid-2015.

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

19 A I don't know the exact --

20 Q If you could just let me finish.

21 A I'm sorry.

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

25 A That's correct. Sorry.

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1 MR. EDWARDS: Object to the form.

2 A Uhm, I don't know, to be honest.

3 Q (BY MS. MENNINGER) And in what order did  
4 Taco Bell, Publix and Mar-a-Lago go, and the aviary,  
5 sorry?

6 A Oh, I would have to guess. Do you want me  
7 to guess?

8 Q Sure.

9 A Um, I would say Publix. And then, I think  
10 that's when I helped my boyfriend out at Taco Bell  
11 and then I think the aviary.

12 Q And where was the Taco Bell?

13 A I was living in Fort Lauder -- I think it  
14 was Fort Lauderdale. Don't quote me on that, but  
15 somewhere in Florida, Broward County, something like  
16 that.

17 Q And who were you living with at that time?

18 A Michael. His name is James, but Michael.

19 Q So you were living with Michael when you  
20 worked at the Taco Bell, right?

21 A Yes, I was living with him.

22 Q And you worked with Michael when you  
23 worked at the Publix, correct?

24 A No.

25 Q Okay. So Publix came after Taco Bell or

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1 Q Whatever address you were living at, at  
2 the time you started at Mar-a-Lago.

3 A [REDACTED] Loxahatchee, Florida  
4 33470.

5 Q How is it that you came to work at  
6 Mar-a-Lago?

7 A My dad is a maintenance manager or  
8 supervisor, I don't know what you call it. But he  
9 worked in the maintenance department, mostly on  
10 tennis courts, working on the air conditioning,  
11 helping set up for functions. And he got me a summer  
12 job there.

13 Q Okay. And you said you were on a break?

14 A Yes.

15 Q What were you on a break from?

16 A I think like -- this is going back so long  
17 now, but I was attempting to get my GED. And it,  
18 summer came, so school stops during the summertime  
19 here in America, and I got a summer job.

20 Q All right. And where were you in school?

21 A I don't actually know the name of the  
22 place. It's -- yeah, I know.

23 Q A GED place?

24 A Yeah, it was, like, I was previously in  
25 Royal Palm Beach High School, but, I mean, because of

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1           Q       Okay. If I can direct your attention back  
2       to Defendant's Exhibit 12 at page 15. And under the  
3       heading Response to Interrogatory Number 9, do you  
4       see that where it says --

5           A       Yes.

6           Q       -- Ms. Joffrey (pronouncing) -- Giuffre,  
7       excuse me, responds as follows?

8           A       Yes.

9           Q       Okay. It says you worked as a locker room  
10      attendant for the spa area, correct?

11          A       Yes.

12          Q       And it says records produced in this case  
13      identify the date of employment as 2000, correct?

14          A       Yes.

15          Q       What records that were produced in this  
16      case cause you to believe that the employment began  
17      in 2000?

18          A       Uhm, is this going back to another  
19      question that I'm not allowed to answer?

20          Q       No.

21          A       I have seen the documents, and I know that  
22      my employment now was in 2000.

23          Q       What documents did you see that caused you  
24      to make that answer?

25          A       The Mar-a-Lago employment documents.



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1 masseuses had their own uniforms.

2 Q What did the masseuses' uniform look like?

3 A I don't remember.

4 Q No recollection at all?

5 A None whatsoever.

6 Q Color?

7 A No, sorry. I remember mine.

8 Q Okay. How did it come to pass that you  
9 were no longer working at Mar-a-Lago in two to three  
10 weeks?

11 A I was approached by Ghislaine Maxwell.

12 Q Okay. And how long had you been working  
13 at Mar-a-Lago when you were approached by Ghislaine  
14 Maxwell?

15 A Roughly two to three weeks.

16 Q Okay. Where in the spa were you when you  
17 were approached by Ghislaine Maxwell?

18 A Just outside the locker room, sitting  
19 where the other girl that works there usually sits.  
20 She was away from the desk. I was reading a book on  
21 massage therapy.

22 Q Was that indoors or outdoors?

23 A Outdoors.

24 Q Okay. And what -- were you in the sun or  
25 in the shade?

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1 wanted to aim for something higher than being a  
2 locker room attendant one day. And. Yeah.

3 Q What was the name of the massage therapist  
4 that you were speaking with?

5 A Oh, I have no idea.

6 Q Can you give me any physical description  
7 of any of them?

8 A Um, there was one who had blonde short  
9 hair. There was -- I would say there's probably  
10 about four massage therapists that work in there.  
11 So, I mean, I don't remember all of them.

12 Q Okay. What time of day was it?

13 MR. EDWARDS: Object to the form.

14 A Afternoon.

15 Q (BY MS. MENNINGER) How late?

16 A Anywhere between 2 to 4.

17 Q And what time did you get off of work?

18 A I believe I got off at 5.

19 Q And what was the rest of your conversation  
20 with Ms. Maxwell?

21 I'm sorry, I don't think you finished.

22 A Thank you. Well, she noticed I was  
23 reading the massage book. And I started to have  
24 chitchat with her just about, you know, the body and  
25 the anatomy and how I was interested in it. And she