

January 3, 2024

VIA ECF

The Honorable Loretta A. Preska
District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **Giuffre v. Maxwell, Case No. 15-cv-7433-LAP**

Dear Judge Preska,

Pursuant to the Court's December 18, 2023, unsealing order, and following conferral with Defendant, Plaintiff files this set of documents ordered unsealed. The filing of these documents ordered unsealed will be done on a rolling basis until completed. This filing also excludes documents pertaining to Does 105 (*see* December 28, 2023, Email Correspondence with Chambers), 107, and 110 (*see* ECF No. 1319), while the Court's review of those documents is ongoing.

Respectfully,

/s/ Sigrid S. McCawley
Sigrid S. McCawley

cc: Counsel of Record (via ECF)

EXHIBIT 4

From: gmax1@ellmax.com
Sent: Saturday, January 10, 2015 9:00 AM
To: Philip Barden; Ross Gow

I am out of my depth to understanding defamation and other legal hazards and don't want to end up in a law suit aimed at me from anyone if I can help it. Apparently even saying Virginia is a liar has hazard! I have never been in a suit criminal or civil and want it to stay that way.

The US lawyers for the Jane Does are filling additional discovery motions and if I speak I open my self to being part of discovery apparently. I am trying to stay out of litigation and not have to employ lawyers for years as I get lost in US legal nightmare. I stand no legal risk currently on these old charges and civil suits against Jeffrey We need to consult with US lawyers on any statement I make and the complaints too

Perhaps we make a statement of the legal risk of saying anything for potential defamation or something that prevents a full and frank detailed rebuttal + the press not being the place for that? Regardless, Philip plse call jeffrey lawyer and see what you can understand from him and pehaps craft something in conjunction with him? Either way I think you need to speak to him to understand my risk so you can help me understand it - too may cooks in the kitchen and I can't make good decisions. Plse reach out to him today + I have already suffered such a terrible and painful loss over the last few days that I can't even see what life after press he'll even looks like - statements that don't address all just lead to more questions..what is my relationship to clinton ? Andrew on and on.

Let's rest till monday. I need head space

THE TERRAMAR PROJECT
FACEBOOK
TWITTER
G+
PINTEREST
INSTAGRAM
PLEDGE
THE DAILY CATCH

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S MOTION TO COMPEL DEFENDANT
TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL¹**

Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this Motion to Compel Defendant to Answer Deposition Questions. During her recent deposition, Defendant refused to answer numerous questions about allegedly “adult” sexual activity related to Jeffrey Epstein. Because this activity is highly relevant to this case, Defendant should be ordered to answer questions about it.

As the Court is aware, this defamation case involves Ms. Giuffre’s assertions that she and other females were recruited by Defendant to be sexually abused by Jeffrey Epstein under the guise of being “massage therapists.” See Complaint, (DE 1), at ¶ 27 (Giuffre “described Maxwell’s role as one of the main women who Epstein used to procure under-aged girls for sexual activities and a primary co-conspirator and participant in his sexual abuse and sex trafficking scheme”). In response to these assertions, Defendant has made the sweeping claim that Ms. Giuffre’s assertions are “entirely false” and “entirely untrue.” Complaint, DE 1, at ¶ 31.

¹ Defendant has labelled her entire deposition transcript as Confidential at this time. Counsel for the parties conferred at the deposition regarding answering questions.

Yet during her deposition, Defendant refused to answer any questions that she construed as having something to do with “consensual adult sex.” Defense counsel supported that position that “frankly, [that’s] none of your business and I instruct the witness not to answer.” See Declaration of Sigrid S. McCawley (“McCawley Decl.”) at Exhibit 1, Tr. of Maxwell Depo. (Apr. 22, 2016) at 21. The result was that at a number of points throughout her deposition, Defendant refused to answer questions about subjects integral to this lawsuit, including questions about what the alleged “massage therapists” were doing at Jeffrey Epstein’s house and the sexual nature of those massages.

For example, Defendant refused to answer questions about whether she had given Jeffrey Epstein a massage:

Q. Have you ever given Jeffrey Epstein a massage?

MR. PAGLIUCA: Object to the form, foundation. And I’m going to instruct you not to answer that question. I don’t have any problem with you asking questions about what the subject matter of this lawsuit is, which would be, as you’ve termed it, sexual trafficking of Ms. Roberts.

To the extent you are asking for information relating to any consensual adult interaction between my client and Mr. Epstein, *I’m going to instruct her not to answer* because it’s not part of this litigation and it is her private confidential information, not subject to this deposition.

MS. McCAWLEY: You can instruct her not to answer. That is your right. But I will bring her back for another deposition because it is part of the subject matter of this litigation so she should be answering these questions. This is civil litigation, deposition and she should be responsible for answering these questions.

MR. PAGLIUCA: I disagree and you understand the bounds that I put on it.

MS. McCAWLEY: No, I don’t. I will continue to ask my questions and you can continue to make your objections.

Q. Did you ever participate from the time period of 1992 to 2009, did you ever participate in a massage with Jeffrey Epstein and another female?

MR. PAGLIUCA: Objection. Do not answer that question. Again, to the extent you are asking for some sort of illegal activity as you’ve construed in

connection with this case I don't have any problem with you asking that question. To the extent these questions involve consensual acts between adults, frankly, they're none of your business and *I will instruct the witness not to answer*.

MS. McCAWLEY: This case involves sexual trafficking, sexual abuse, questions about her having interactions with other females is relevant to this case. She needs to answer these questions.

MR. PAGLIUCA: I'm instructing her not to answer.

MS. McCAWLEY: Then we will be back here again.

See McCawley Decl. at Exhibit 2, Tr. of Maxwell Depo. (Apr. 22, 2016) at 19-22 (emphasis added).

Defendant's participation in massages with Epstein is a central part of this case. Ms. Giuffre has explained that during her first sexual encounter with Jeffrey Epstein, it was Defendant who provided instruction on how to do it and how to turn the massage into a sexual event. Obviously, proof that Defendant had previously massaged Epstein – include massages with sexual component – would provide important corroboration for Ms. Giuffre's testimony at trial. And proof that Defendant was involved in massages will further help prove that statements to the press that Virginia's allegations were "obvious lies" was itself an obvious lie.

As another example, Defendant refused to answer questions about her knowledge that Johanna Sjoborg was hired to work for Epstein and provided massages. In the police report, Johanna admitted that Maxwell recruited her to work for Epstein. *See* McCawley Decl. at Exhibit 3, Giuffre000076-77 (police report indicating that Johanna was recruited by Maxwell). Yet during Defendant's deposition, she refused to answer questions regarding Johanna Sjoborg.

Q. Do you know what tasks Johanna was hired to performance?

A. She was tasked to answer telephones.

Q. Did you ever ask her to rub Jeffrey's feet? . . .

A. I believe that I have read that, but I don't have any memory of it.

Q. Did you ever tell Johanna that she would get extra money if she provided Jeffrey massages?

A. I was always happy to give career advice to people and I think that becoming somebody in the healthcare profession, either exercise instructor or nutritionist or professional massage therapist is an excellent job opportunity. Hourly wages are around 7, 8, \$9 and as a professional healthcare provider you can earn somewhere between as we have established 100 to \$200 and to be able to travel and have a job that pays that is a wonderful job opportunity. So in the context of advising people for opportunities for work, it is possible that I would have said that she should explore that as an option.

Q. Did you tell her she would get extra money if she massaged Jeffrey?

A. I'm just saying, I cannot recall the exact conversation. I give career advice and I have done that.

Q. Did you ever have Johanna massage you?

A. I did.

Q. How many times?

A. I don't recall how many times.

Q. Was there sex involved?

A. No. . . .

Q. Did you ever have sexual contact with Johanna?

MR. PAGLIUCA: Object to the form and foundation. You need to give me an opportunity to get in between the questions.
Anything that involves consensual sex on your part, I'm instructing you not to answer.

Q. Did you ever have sexual contact with Johanna?

A. [MR. PAGLIUCA?] Again, she is an adult --

Q. I'm asking you, did you ever have sexual contact with Johanna?

A. I've just been instructed not to answer.

Q. On what basis?

A. You have to ask my lawyer.

See McCawley Decl. at Exhibit 4, Tr. of Maxwell Depo. (Apr. 22, 2016) at 60-62 (emphasis added).

Here again, this information is critical to the case. Among other things, these questions are designed to show a *modus operani* (“M.O”) for Epstein and Maxwell – specifically, how they recruited for a non-sexual massage than converted the massage into sexual activities.

One last illustration comes from Defendant’s refusal to answer about her knowledge of Epstein’s sexual interests during massages:

Q. Does Jeffrey like to have his nipples pinched during sexual encounters?

MR. PAGLIUCA: Objection to form and foundation.

A. I’m not referring to any advice on my counsel. I’m not talking about any adult sexual things when I was with him.

Q. When Jeffrey would have a massage, would he request that the masseuse pinch his nipples while he was having a massage?

A. I’m not talking about anything with consensual adult situation.

See McCawley Decl. at Exhibit 5, Tr. of Maxwell Depo. (Apr. 22, 2016) at 82.

While Epstein himself might also provide answers to these questions, it appears likely that he will assert his Fifth Amendment privilege regarding his sexual activities. Accordingly, Ms. Giuffre must pursue questioning of Maxwell to obtain information on this subject. Here again, information about Epstein’s sexual idiosyncrasies will provide important corroboration to Ms. Giuffre’s testimony that she had sexual interactions of an identical nature with Epstein.

These refusals are not an isolated instance. Instead, similar refusals to answer questions occurred repeatedly throughout the deposition. See, e.g., McCawley Decl. at Composite Exhibit 6. 52-55; 64-65; 82; 92-93; 137-38; 307-09.

The Court should compel Defendant to answer all these questions. In addition to the specific points made above, the “big picture” here reveals how vital such discovery is. At the core of Ms. Giuffre’s allegations is the allegation that Defendant lured her into a sexual situation with the offer of a job making money as a massage therapist; that Epstein always habitually tried

to turn massages into sex (that was his modus operandi and plan all along); and that Maxwell recruited other females for an ostensibly proper position, such as therapeutic masseuse, with knowledge that the intent was for that person would be pressured to provide sexual gratification to Epstein. As a result, Epstein's use of massages for sexual purposes is a central part of this case.

And Defendant's role in those massages – and knowledge of the purposes of those massages – is a critical piece of evidence showing her state of mind when she attacked Ms. Giuffre's assertions as "entirely untrue." Ms. Giuffre intends to prove at trial that Defendant knew full well the sexual purpose for which she was recruiting females – including underage females like Ms. Giuffre. Ms. Giuffre is entitled to explore Defendant's knowledge of the sexual activities that took place under the guise of "massages." Otherwise Defendant will be able to portray to the jury an inaccurate picture of that what was happening at Epstein's house what nothing more than run-of-the-mill massage therapy. *See, e.g.,* McCawley Decl. at Exhibit 7, Tr. of Maxwell Depo. (Apr. 22, 2016) at 51 ("Q: Did [the pay for massage therapists] vary on what sexual acts they performed? . . . A: No, it varied depending on how much time, some massage therapists charge more and some charge less.").

Defendant's refusal to answer questions about alleged "adult" consensual sex also blocks Ms. Giuffre from seeking legitimate discovery in this case. By refusing to answer questions about her and Epstein's sexual activities with alleged "adults," Defendant is essentially given the ability to refuse to answer any sexual question she does not wish to answer. Defendant simply has to deem the question as involving "consensual adult sex" and no need be given. The result is to leave Ms. Giuffre with no way of exploring the identity of these alleged adults, the ages of these alleged adults, and indeed whether they were adults at all. This allows Defendant to claim

that she is unaware of any sexual activity involving underage females, because (she claims) the only sexual activity she was aware involved adults.

The Court should compel Ms. Maxwell to answer all questions about her knowledge relating to sexual activities with Epstein and other females while at Epstein's various homes. *See* Fed. R. Crim. P. 37(a)(3)(B)(i); *see, e.g., Kelly v. AI Tech.*, No. 09 CIV. 962 LAK MHD, 2010 WL 1541585, at *20 (S.D.N.Y. Apr. 12, 2010) ("Under the Federal Rules, when a party refuses to answer a question during a deposition, the questioning party may subsequently move to compel disclosure of the testimony that it sought. The court must determine the propriety of the deponent's objection to answering the questions, and can order the deponent to provide improperly withheld answers during a continued deposition" (internal citations omitted)). Of course, the party objecting to discovery must carry the burden of proving the validity of its objections, particularly in light of "the broad and liberal construction afforded the federal discovery rules" *John Wiley & Sons, Inc. v. Book Dog Books, LLC*, 298 F.R.D. 184, 186 (S.D.N.Y. 2014). For purposes of a deposition, the information sought "need not be admissible at the trial if the discovery appears reasonably calculated to lead to the discovery of admissible evidence." *Chen-Oster v. Goldman, Sachs & Co.*, 293 F.R.D. 557, 561 (S.D.N.Y. 2013) (*citing* Fed.R.Civ.P. 26(b)(1)).

Defendant cannot carry her burden of showing that the questions asked are not reasonably calculated to lead to the discovery of admissible evidence. This is a case in which sexual activities lie at the heart of the issues in dispute. As a result, it is hardly surprising to find that discovery pertains to alleged "adult" sexual activities – and questions about such subjects are entirely proper. *See, e.g., Condit v. Dunne*, 225 F.R.D. 100, 113 (S.D.N.Y. 2004) (in defamation case, "Plaintiff is hereby ordered to answer questions regarding his sexual relationships in so far

as they are relevant to a defense of substantial truth, mitigation of damages, or impeachment of plaintiff.”); *Weber v. Multimedia Entm't, Inc.*, No. 97 CIV. 0682 PKL THK, 1997 WL 729039, at *3 (S.D.N.Y. Nov. 24, 1997) (“While discovery is not unlimited and may not unnecessarily intrude into private matters, in the instant case inquiry into private matters is clearly relevant to the subject matter of the suit. Accordingly, plaintiff Misty Weber shall respond to defendants’ interrogatories concerning her sexual partners . . .”).

Generally speaking, instructions from attorneys to their clients not to answer questions at a deposition should be “limited to [issues regarding] privilege.” *Morales v. Zondo, Inc.*, 204 F.R.D. 50, 54 (S.D.N.Y. 2001). In this case, defense counsel ranged far beyond the normal parameters of objections and sought to decide for himself what issues were relevant. That was improper and the Court should order a resumption of the Defendant’s deposition so that she can answer questions about her knowledge of sexual activity relating to Jeffrey Epstein.

CONCLUSION

Defendant should be ordered to sit for a follow-up deposition and directed to answer questions regarding her knowledge of alleged “adult” sexual activity.

Dated: May 5, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: 

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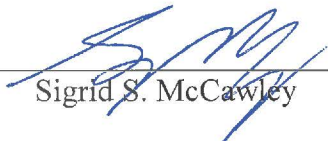
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of May, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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Sigrid S. McCawley

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - X

****CONFIDENTIAL****

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

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21 Also Present:
22 James Christe, videographer
23
24
25

1 G Maxwell - Confidential

2 A. She was tasked to answer
3 telephones.

4 Q. Did you ever ask her to rub
5 Jeffrey's feet?

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

8 A. I believe that I have read that,
9 but I don't have any memory of it.

10 Q. Did you ever tell Johanna that she
11 would get extra money if she provided Jeffrey
12 massages?

13 A. I was always happy to give career
14 advice to people and I think that becoming
15 somebody in the healthcare profession, either
16 exercise instructor or nutritionist or
17 professional massage therapist is an
18 excellent job opportunity. Hourly wages are
19 around 7, 8, \$9 and as a professional
20 healthcare provider you can earn somewhere
21 between as we have established 100 to \$200
22 and to be able to travel and have a job that
23 pays that is a wonderful job opportunity. So
24 in the context of advising people for
25 opportunities for work, it is possible that I

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2 would have said that she should explore that
3 as an option.

4 Q. Did you tell her she would get
5 extra money if she massaged Jeffrey?

6 A. I'm just saying, I cannot recall
7 the exact conversation. I give career advice
8 and I have done that.

9 Q. Did you ever have Johanna massage
10 you?

11 A. I did.

12 Q. How many times?

13 A. I don't recall how many times.

14 Q. Was there sex involved?

15 A. No.

16 Q. Did you ever instruct Johanna to
17 massage Glenn Dubin?

18 A. I don't believe -- I have no
19 recollection of it.

20 Q. Did you ever have sexual contact
21 with Johanna?

22 MR. PAGLIUCA: Object to the form
23 and foundation. You need to give me an
24 opportunity to get in between the
25 questions.

1 G Maxwell - Confidential

2 Anything that involves consensual
3 sex on your part, I'm instructing you
4 not to answer.

5 Q. Did you ever have sexual contact
6 with Johanna?

7 A. Again, she is an adult --

8 Q. I'm asking you, did you ever have
9 sexual contact with Johanna?

10 A. I've just been instructed not to
11 answer.

12 Q. On what basis?

13 A. You have to ask my lawyer.

14 Q. Did you ever have sexual contact
15 with Johanna that was not consensual on
16 Johanna's part?

17 MR. PAGLIUCA: You can answer
18 nonconsensual.

19 A. I've never had nonconsensual sex
20 with anybody.

21 Q. Not Annie Farmer?

22 MR. PAGLIUCA: Objection.

23 A. I just testified I never had
24 nonconsensual sex with anybody ever, at any
25 time, at anyplace, at any time, with anybody.

EXHIBIT 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - X

CONFIDENTIAL

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

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BY: JEFFREY S. PAGLIUCA, ESQUIRE
LAURA A. MENNINGER, ESQUIRE

Also Present:
James Christe, videographer

1 G Maxwell - Confidential

2 for sexual acts.

3 Q. I'm asking if they performed sexual
4 acts?

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

7 Q. Did any of the massage therapists
8 who were at the home perform sexual acts for
9 Jeffrey Epstein?

10 A. I don't know what you mean by
11 sexual acts.

12 Q. Did any of the massage therapists
13 who were working at the home perform sexual
14 acts, including touching the breasts,
15 touching the vaginal area, being touched
16 while Jeffrey is masturbating, having
17 intercourse, any of those things?

18 MR. PAGLIUCA: Objection. Form and
19 foundation.

20 To the extent any of this is asking
21 for to your knowledge any consensual sex
22 act that may or may not have involved
23 you, I'm instructing you not to answer
24 the question.

25 Q. I'm not asking about consensual sex

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2 acts. I'm asking whether any of the massage
3 therapists performed sexual acts for Mr.
4 Epstein, as I have just described?

5 A. I have never seen anybody have
6 sexual intercourse with with Jeffrey, ever.

7 Q. I'm not asking about sexual
8 intercourse. I'm asking about any sexual
9 act, touching of the breast -- did you ever
10 see -- can you read back the question?

11 (Record read.)

12 A. I'm not addressing any questions
13 about consensual adult sex. If you want to
14 talk about what the subject matter, which is
15 defamation and lying, Virginia Roberts, that
16 you and Virginia Roberts are participating in
17 perpetrating her lies, I'm happy to address
18 those. I never saw any inappropriate
19 underage activities with Jeffrey ever.

20 Q. I'm not asking about underage. I'm
21 asking about whether any of the masseuses
22 that were at the home perform sexual acts for
23 Jeffrey Epstein?

24 A. I have just answered the question.

25 Q. No, you haven't.

1 G Maxwell - Confidential

2 A. I have.

3 Q. No, you haven't.

4 A. Yes, I have.

5 Q. You are refusing to answer the
6 question.

7 A. Let's move on.

8 Q. I'm in charge of the deposition. I
9 say when we move on and when we don't.

10 You are here to respond to my
11 questions. If you are refusing to answer the
12 court will bring you back for another
13 deposition to answer these questions.

14 Do you understand that?

15 MR. PAGLIUCA: You don't need to
16 threaten the witness.

17 MS. McCAWLEY: I'm not threatening
18 her. I'm making sure the record is
19 clear.

20 MR. PAGLIUCA: Certainly can you
21 apply to have someone come back and the
22 court may or may not have her come back
23 again.

24 Again, she is not answering
25 questions that relate to adult consent

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2 sex acts. Period. And that's the
3 instruction and we can take it up with
4 the court.

5 Q. Ms. Maxwell, are you aware of any
6 sexual acts with masseuses and Jeffrey
7 Epstein that were nonconsensual?

8 A. No.

9 Q. How do you know that?

10 A. All the time that I have been in
11 the house I have never seen, heard, nor
12 witnessed, nor have reported to me that any
13 activities took place, that people were in
14 distress, either reported to me by the staff
15 or anyone else. I base my answer based on
16 that.

17 Q. Are you familiar with a person by
18 the name of Annie Farmer?

19 A. I am.

20 Q. Has Annie Farmer given a statement
21 to police about you performing sexual acts on
22 her?

23 A. I have not heard that.

24 Q. Has Annie Farmer given a statement
25 to police about Jeffrey Epstein performing

1 G Maxwell - Confidential

2 Q. Did you have sex with her?

3 MR. PAGLIUCA: This is the same
4 instruction about consensual or
5 nonconsensual.

6 Q. Was Emmy under the age of 18 when
7 you hired her?

8 A. No. I didn't hire her, as I said,
9 Jeffrey did.

10 Q. Did Emmy ever have sex with
11 Jeffrey?

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

14 A. How would I know what somebody else
15 did.

16 Q. You weren't involved in the sex
17 between Jeffrey, Emmy and yourself?

18 A. We already --

19 Q. Were you involved with sex between
20 Jeffrey, Emmy and yourself?

21 MR. PAGLIUCA: Everyone is talking
22 over each other. You heard the
23 question.

24 Again, you you know what the
25 instruction is. If there is any

1 G Maxwell - Confidential

2 consensual issue involved, I instruct
3 you not to answer.

4 A. Moving on.

5 Q. So you are refusing to answer that
6 question?

7 A. I've been instructed by my lawyer.

8 Q. Did you ever have sex with Jeffrey,
9 Emmy, Virginia and yourself when Virginia was
10 underage?

11 A. Absolutely not.

12 MR. PAGLIUCA: We've been going for
13 about an hour. I would like to take a
14 five-minute break, please.

15 MS. McCAWLEY: I'm almost done.

16 MR. PAGLIUCA: You are not going to
17 allow a break.

18 MS. McCAWLEY: As soon as I get
19 through my line of questioning, which is
20 perfectly appropriate.

21 Q. Did Emmy Taylor travel with you and
22 Jeffrey to Europe?

23 A. I'm sure she did.

24 Q. What is she doing today?

25 A. I have no idea.

1 G Maxwell - Confidential

2 Q. Did you train Virginia on how to
3 recruit other girls to perform sexual
4 massages?

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

7 A. No. And it's absurd and her entire
8 story is one giant tissue of lies and
9 furthermore, she herself has -- if she says
10 that, you have to ask her about what she did.

11 Q. Does Jeffrey like to have his
12 nipples pinched during sexual encounters?

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

15 A. I'm not referring to any advice on
16 my counsel. I'm not talking about any adult
17 sexual things when I was with him.

18 Q. When Jeffrey would have a massage,
19 would he request that the masseuse pinch his
20 nipples while he was having a massage?

21 A. I'm not talking about anything with
22 consensual adult situation.

23 Q. What about with underage --

24 A. I am not aware of anything.

25 Q. You are not aware of Jeffrey

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2 Q. In your responsibilities in working
3 for Jeffrey, would you book massages for him
4 on any given day so that he would have a
5 massage scheduled? Would you take a call for
6 example and book a massage for him?

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

9 Q. You can answer.

10 A. Typically, that was not my
11 responsibility. He would either book the
12 massage himself or one of his other
13 assistants would do that.

14 Q. From time to time you had to do
15 that?

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

18 A. Like I said, typically it was
19 somebody else's responsibility.

20 Q. If you were unable to book a girl
21 for a massage on a given day, would that mean
22 that you were responsible for giving him a
23 sexual massage?

24 MR. PAGLIUCA: Objection to the
25 form and foundation and I instruct you

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2 not to answer any questions about any of
3 your consensual adult sexual activity.

4 Q. So you are not going to answer that
5 question?

6 A. You just heard my counsel.

7 Q. Have you ever said to anybody that
8 recruiting other girls to perform sexual
9 massages for Jeffrey Epstein takes the
10 pressure off you?

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

13 A. Repeat the question and break it
14 out.

15 Q. Have you ever said to anybody that
16 you recruit girls --

17 A. Stop right there. I never
18 recruited girls, let's stop there. Now
19 breakdown the question.

20 Q. Have you ever said to anybody --

21 A. By girls, we are talking about
22 underage people -- you said girls, are you
23 talking about underage -- we are not talking
24 about consensual acts -- this is a defamation
25 suit.

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2 the flights?

3 A. I can't recollect having a meal
4 with them, but just so we are clear, the
5 allegations that Clinton had a meal on
6 Jeffrey's island is 100 percent false.

7 Q. But he may have had a meal on
8 Jeffrey's plane?

9 A. I'm sure he had a meal on Jeffrey's
10 plane.

11 Q. You do know how many times he flew
12 on Jeffrey's plane?

13 A. I don't.

14 Q. Do you know who Doug Band is?

15 A. I do.

16 Q. How do you know him?

17 A. He used to work or still works for
18 Bill Clinton.

19 Q. Did you ever have a relationship
20 with him?

21 A. We are talking about adult
22 consensual relationships, it's off the
23 record.

24 Q. I'm not asking what you did with
25 him, I'm asking if you ever had a

1 G Maxwell - Confidential

2 relationship with him?

3 MR. PAGLIUCA: If you understand
4 the term relationship, certainly you can
5 answer that.

6 A. Define relationship.

7 Q. Somebody that you would have spent
8 time together, either seeing them in a
9 romantic relationship or --

10 A. You need to be, what do you mean by
11 romantic. I was friends with Doug but you
12 are suggesting something more so I want to be
13 clear what you are actually asking me.

14 Q. You defined it. You said you were
15 friends with him. If that's what you were
16 that's all I need to know.

17 While you were on the trip with
18 President Clinton, do you recall where you
19 stayed at these locations, in other words,
20 would you leave the jet and stay overnight at
21 a hotel, do you have a recollection of this
22 trip?

23 A. I recollect the trip but if you're
24 asking me where we stayed, you can see it's a
25 very fast paced trip. It was very tiring and

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2 form and foundation.

3 A. I don't know why the name is -- I'm
4 sorry -- I can't -- I have no idea. I
5 recognize the name but that's it.

6 Q. Was Johanna Sjoberg a masseuse?

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

9 A. What are you asking me, I'm sorry?

10 Q. When Johanna Sjoberg worked for
11 Jeffrey Epstein, did she perform massages?

12 A. I've testified that when Johanna
13 came originally, she came to answer
14 telephones. I believe at some point she
15 became a masseuse. I don't recollect when
16 and I personally had massages from Johanna.

17 Q. What did Johanna do for Jeffrey
18 Epstein, did she perform massages, anything
19 else?

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

22 A. When she came she answered phones
23 and at some point, I believe, I don't have
24 any firm recollection, but I believe she went
25 to school and became a masseuse and I had

1 G Maxwell - Confidential

2 messages from her.

3 Q. Did you ever have any sexual
4 interaction with her?

5 MR. PAGLIUCA: Object to the form
6 and foundation and I'm going to instruct
7 you if we're talking about any
8 consensual adult contact, you are not
9 allowed to answer the question.

10 Q. Did you have any sexual contact
11 with her in the presence of Jeffrey Epstein?

12 MR. PAGLIUCA: Same instruction.

13 Q. Did you have any sexual contact
14 with her in the presence of anybody other
15 than Jeffrey Epstein?

16 MR. PAGLIUCA: Same instruction.

17 Q. How many messages did you receive
18 from Johanna?

19 A. I really don't recall but a fair
20 amount.

21 Q. Did the messages involve sex?

22 MR. PAGLIUCA: I'm going to
23 instruct you not to answer.

24 Q. Have you ever engaged in sex with
25 any female?

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2 MR. PAGLIUCA: I'm going to
3 instruct you not to answer.

4 MS. McCAWLEY: I want the record to
5 reflect that Ms. Maxwell's attorney is
6 directing her not to answer this series
7 of questions.

8 MR. PAGLIUCA: It definitely does.

9 Q. Were you responsible for
10 introducing Anuska to Jeffrey Epstein?

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

13 A. I already testified that I don't
14 really recall Anuska.

15 Q. Were you responsible for
16 introducing Johanna to Jeffrey Epstein?

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

19 A. Again, I don't like the
20 characterization of introduction. Johanna
21 came to answer telephones.

22 Q. When did you -- were you the person
23 who brought or introduced or met Johanna for
24 purposes of bringing her to Jeffrey Epstein's
25 home?

COMPOSITE EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

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

- - -

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

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Also Present:
James Christe, videographer

Questions About People Under the Age of 18 at Epstein's Home

1 G Maxwell - Confidential

2 Q. You can answer.

3 A. I have not any idea exactly of the
4 youngest adult employee that I hired for
5 Jeffrey.

6 Q. When you say adult employee, did
7 you ever hire someone that was under the age
8 of 18?

9 A. Never.

10 Q. Did you ever bring someone who was
11 under -- invite someone under the age of 18
12 to Jeffrey's home, any of his homes?

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

15 A. Can you repeat the question?

16 Q. Did you ever invite anybody who was
17 under the age of 18 to Jeffrey's homes?

18 MR. PAGLIUCA: Same objections.

19 A. I have a number of friends that
20 have children and friends of mine that have
21 kids and in the invitation of my friends and
22 their kids, I'm sure I may have invited some
23 of my friend's kids to come.

24 Q. Anybody that is not a friend of
25 yours.

Questions About Meeting the Plaintiff and Massages with Plaintiff

1 G Maxwell - Confidential

2 A. Ms. Roberts held herself out --

3 Q. I'm not asking how she held herself
4 out. I'm asking how she arrived at the home.
5 Did you meet her and invite her to come to
6 the home or how did she arrive there?

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

9 A. Ms. Roberts held her to be a
10 masseuse and her mother drove her to the
11 house.

12 Q. When did you first meet Virginia
13 Roberts?

14 A. I don't have a recollection of the
15 first meeting.

16 Q. Do you recall meeting her at
17 Mar-a-Lago?

18 A. Like I said, I don't have a
19 recollection of meeting Ms. Roberts.

20 Q. So you recall Ms. Roberts being
21 brought to the home by her mother, is that
22 your testimony?

23 A. That is my testimony.

24 Q. And that is the first time you met
25 her?

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2 A. Like I said, I don't recall meeting
3 her the first time. I do remember her mother
4 bringing her to the house.

5 Q. Are you a member at Mar-a-Lago?

6 A. No.

7 Q. Have you visited Mar-a-Lago?

8 A. Yes.

9 Q. Did you visit Mar-a-Lago in the
10 year 2000?

11 A. I'm pretty sure I did.

12 Q. When Ms. Roberts arrived at the
13 home with her mother, what happened?

14 A. I spoke to her mother outside of
15 the house and she -- what I don't recall is
16 exactly what happened because I was talking
17 to her mother the entire she was in the
18 house.

19 Q. Did you introduce Ms. Roberts to
20 Jeffrey Epstein?

21 A. I don't recall how she actually met
22 Mr. Epstein. As I said, I spoke to her
23 mother the entire time outside the house.

24 Q. Did you walk Ms. Roberts up to the
25 upstairs location at the Palm Beach house to

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2 absolutely everything that took place in that
3 first meeting. She has lied repeatedly,
4 often and is just an awful fantasist. So
5 very difficult for anything to take place
6 that she repeated because I was with her
7 mother the entire time.

8 Q. So did you have -- did you give a
9 massage with Virginia Roberts and Mr. Epstein
10 during the first time Virginia Roberts was at
11 the West Palm Beach house?

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

14 Q. Yes or no?

15 A. No.

16 Q. Have you ever given a massage with
17 Virginia Roberts in the room and Jeffrey
18 Epstein?

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

21 A. No.

22 Q. Have you ever given Jeffrey Epstein
23 a massage?

24 MR. PAGLIUCA: Object to the form,
25 foundation. And I'm going to instruct

Questions About Messages with Minors

1 G Maxwell - Confidential

2 questions.

3 MR. PAGLIUCA: I'm instructing her
4 not to answer.

5 MS. McCAWLEY: Then we will be back
6 here again.

7 Q. Have you ever given a massage to
8 Mr. Epstein with a female that was under the
9 age of 18?

10 A. Can you repeat the question?

11 Q. Yes. Have you ever given a massage
12 to Mr. Epstein with a female that was under
13 the age of 18?

14 A. No.

15 Q. Have you ever observed Mr. Epstein
16 having a massage given by an individual, a
17 female, who was under the age of 18?

18 A. No.

19 Q. Have you ever observed females
20 under the age of 18 in the presence of
21 Jeffrey Epstein at his home?

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

24 A. Again, I have friends that have
25 children --

Questions About Hiring Massage Therapists

1 G Maxwell - Confidential

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

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

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

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

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

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

Questions About [REDACTED] and Nadia Marcinkova

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2 here today I do not.

3 Q. Ms. Maxwell, when did you first
4 meet [REDACTED]

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

7 A. I have no idea when I met her.

8 Q. Do you know how old she was when
9 you met her?

10 A. I have no idea how old she was when
11 I met her.

12 Q. Is it possible she was 13 years old
13 when you first met her?

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

16 A. [REDACTED]

17 [REDACTED]
18 may have been in the house when Jeffrey was
19 in the house. I have no idea how old she
20 was.

21 Q. I understand she was with [REDACTED]

22 [REDACTED]

23 I'm asking if [REDACTED] was 13
24 years old when you first met her?

25 A. I have no idea.

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2 Q. Was she under 18 when you first met
3 her?

4 A. I have no idea how old she was when
5 I first met her.

6 Q. Did she look like a child when you
7 first met her?

8 A. I don't remember what she looked
9 like at the time she was in the house.

10 Q. How many years have you known her?

11 A. I can only recall the last time I
12 saw her.

13 Q. When was the first time you met
14 her?

15 A. Again, I just told you, I don't
16 recall the first time I met her.

17 Q. Did [REDACTED] travel with you
18 on Jeffrey's planes?

19 A. I wouldn't remember if [REDACTED] was on
20 the plane or not.

21 Q. Did you ever have sex with [REDACTED]
22 [REDACTED]

23 A. No.

24 Q. Did you ever observe Jeffrey having
25 sex with [REDACTED]

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2 A. No.

3 Q. Were you aware that Jeffrey was
4 having sexual contact with [REDACTED] when
5 she was 13 years old?

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

8 A. I would be very shocked and
9 surprised if that were true.

10 Q. Were you in the house when [REDACTED]
11 [REDACTED] was in the house in a private area
12 with Jeffrey Epstein?

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

15 A. Can you repeat the question.

16 Q. Were you ever in the Palm Beach
17 house when Jeffrey Epstein was in the house
18 with [REDACTED]?

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

21 A. I've already testified that I have
22 met her and that she was there [REDACTED]

23 [REDACTED] I don't understand what your
24 question is asking.

25 Q. So you have never seen [REDACTED]

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2 [REDACTED]

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

5 Q. Is that your testimony?

6 A. I already said I don't recall all
7 the times I've seen her and I have no memory
8 of that.

9 Q. Have you ever seen [REDACTED] in
10 the house with Jeffrey Epstein [REDACTED]
11 [REDACTED]

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

14 A. I just told you I don't recall
15 seeing [REDACTED]

16 Q. Were you ever involved in an orgy
17 with [REDACTED]

18 A. No, absolutely not.

19 Q. Can you tell me, do you know an
20 individual by the name of Nadia Marcinkova?

21 A. I do.

22 Q. How did you meet Nadia Marcinkova?

23 A. At some point she was a friend of
24 Jeffrey's and I recall meeting her at some
25 point.

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2 Q. Did Jeffrey arrange for a visa for
3 Nadia Marcinkova?

4 A. I don't know what Jeffrey did. I
5 cannot testify what Jeffrey did.

6 Q. Was Nadia involved in sex with
7 Jeffrey and other girls?

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

10 Q. Girls under the age of 18?

11 MR. PAGLIUCA: Same objection.

12 A. I have no idea.

13 Q. Was Nadia involved with sex with
14 Jeffrey and girls over the age of 18?

15 MR. PAGLIUCA: Same objection.

16 A. I have no idea.

17 Q. Did Nadia recruit other girls for
18 sex with Jeffrey?

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

21 A. I have no idea.

22 Q. Do you still talk to Nadia?

23 A. No.

24 Q. Is she a pilot?

25 A. I have no idea.

Questions About Mr. Epstein and Sex

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2 acts. I'm asking whether any of the massage
3 therapists performed sexual acts for Mr.
4 Epstein, as I have just described?

5 A. I have never seen anybody have
6 sexual intercourse with with Jeffrey, ever.

7 Q. I'm not asking about sexual
8 intercourse. I'm asking about any sexual
9 act, touching of the breast -- did you ever
10 see -- can you read back the question?

11 (Record read.)

12 A. I'm not addressing any questions
13 about consensual adult sex. If you want to
14 talk about what the subject matter, which is
15 defamation and lying, Virginia Roberts, that
16 you and Virginia Roberts are participating in
17 perpetrating her lies, I'm happy to address
18 those. I never saw any inappropriate
19 underage activities with Jeffrey ever.

20 Q. I'm not asking about underage. I'm
21 asking about whether any of the masseuses
22 that were at the home perform sexual acts for
23 Jeffrey Epstein?

24 A. I have just answered the question.

25 Q. No, you haven't.

Questions About Sarah Kellen, Glen Dubin, Plaintiff, Johanna
Sjoberg, Annie Farmer and Sex

1 G Maxwell - Confidential

2 A. I have.

3 Q. No, you haven't.

4 A. Yes, I have.

5 Q. You are refusing to answer the
6 question.

7 A. Let's move on.

8 Q. I'm in charge of the deposition. I
9 say when we move on and when we don't.

10 You are here to respond to my
11 questions. If you are refusing to answer the
12 court will bring you back for another
13 deposition to answer these questions.

14 Do you understand that?

15 MR. PAGLIUCA: You don't need to
16 threaten the witness.

17 MS. McCAWLEY: I'm not threatening
18 her. I'm making sure the record is
19 clear.

20 MR. PAGLIUCA: Certainly can you
21 apply to have someone come back and the
22 court may or may not have her come back
23 again.

24 Again, she is not answering
25 questions that relate to adult consent

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2 sex acts. Period. And that's the
3 instruction and we can take it up with
4 the court.

5 Q. Ms. Maxwell, are you aware of any
6 sexual acts with masseuses and Jeffrey
7 Epstein that were nonconsensual?

8 A. No.

9 Q. How do you know that?

10 A. All the time that I have been in
11 the house I have never seen, heard, nor
12 witnessed, nor have reported to me that any
13 activities took place, that people were in
14 distress, either reported to me by the staff
15 or anyone else. I base my answer based on
16 that.

17 Q. Are you familiar with a person by
18 the name of Annie Farmer?

19 A. I am.

20 Q. Has Annie Farmer given a statement
21 to police about you performing sexual acts on
22 her?

23 A. I have not heard that.

24 Q. Has Annie Farmer given a statement
25 to police about Jeffrey Epstein performing

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2 asked and answered already.

3 Q. You can answer the question.

4 A. I have no idea what Sarah Kellen
5 did.

6 Q. You never observed Sarah Kellen
7 with girls under the age of 18 at Jeffrey's
8 home?

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

11 A. The answer is no, I have no idea.

12 Q. Do you know Glenn Dubin?

13 A. I do.

14 Q. What is your relationship with
15 Glenn Dubin?

16 MR. PAGLIUCA: Object to the form.

17 A. What do you mean what is my
18 relationship.

19 Q. Are you friendly with him, how do
20 you know him?

21 A. He is the husband of Eva Dubin.

22 Q. Is Eva Dubin one of your friends?

23 A. Yes.

24 Q. Did you ever send Virginia to
25 Glenn's condo at the Breakers to give him a

1 G Maxwell - Confidential

2 message?

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

5 A. No.

6 Q. Did you ever instruct Virginia
7 Roberts to have sex with Glenn?

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

10 A. I have never instructed Virginia to
11 have sex with anybody ever.

12 Q. How old was Eva Anderson when she
13 met Jeffrey?

14 MR. PAGLIUCA: Objection to the
15 form and foundation.

16 A. I have no idea.

17 Q. What's she under the age of 18?

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

20 A. I just testified I have idea how
21 old she was.

22 Q. You testified she was your friend.
23 You don't know how old she was when she met
24 Jeffrey?

25 A. That happened sometime in the '70s,

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2 how would I know, or '80s. I have no idea.

3 Can you testify to what your friends did 30

4 years ago?

5 Q. You don't ask the questions here,

6 Ms. Maxwell.

7 What about Johanna Sjoberg, when

8 did you first meet Johanna?

9 A. I don't recall the exact date.

10 Q. Did you hire Johanna?

11 A. I don't hire people, she came to

12 work at the house to answer phones.

13 Q. Where did you meet her?

14 A. I just testified, I don't recall

15 exactly when I met her.

16 Q. Was one of your job

17 responsibilities to interview people that

18 would be then hired by Jeffrey?

19 A. That was one of my

20 responsibilities.

21 Q. Do you recall interviewing Johanna?

22 A. I don't recall the exact interview,

23 no.

24 Q. Do you know what tasks Johanna was

25 hired to performance?

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2 A. She was tasked to answer
3 telephones.

4 Q. Did you ever ask her to rub
5 Jeffrey's feet?

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

8 A. I believe that I have read that,
9 but I don't have any memory of it.

10 Q. Did you ever tell Johanna that she
11 would get extra money if she provided Jeffrey
12 massages?

13 A. I was always happy to give career
14 advice to people and I think that becoming
15 somebody in the healthcare profession, either
16 exercise instructor or nutritionist or
17 professional massage therapist is an
18 excellent job opportunity. Hourly wages are
19 around 7, 8, \$9 and as a professional
20 healthcare provider you can earn somewhere
21 between as we have established 100 to \$200
22 and to be able to travel and have a job that
23 pays that is a wonderful job opportunity. So
24 in the context of advising people for
25 opportunities for work, it is possible that I

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2 would have said that she should explore that
3 as an option.

4 Q. Did you tell her she would get
5 extra money if she massaged Jeffrey?

6 A. I'm just saying, I cannot recall
7 the exact conversation. I give career advice
8 and I have done that.

9 Q. Did you ever have Johanna massage
10 you?

11 A. I did.

12 Q. How many times?

13 A. I don't recall how many times.

14 Q. Was there sex involved?

15 A. No.

16 Q. Did you ever instruct Johanna to
17 massage Glenn Dubin?

18 A. I don't believe -- I have no
19 recollection of it.

20 Q. Did you ever have sexual contact
21 with Johanna?

22 MR. PAGLIUCA: Object to the form
23 and foundation. You need to give me an
24 opportunity to get in between the
25 questions.

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2 Anything that involves consensual
3 sex on your part, I'm instructing you
4 not to answer.

5 Q. Did you ever have sexual contact
6 with Johanna?

7 A. Again, she is an adult --

8 Q. I'm asking you, did you ever have
9 sexual contact with Johanna?

10 A. I've just been instructed not to
11 answer.

12 Q. On what basis?

13 A. You have to ask my lawyer.

14 Q. Did you ever have sexual contact
15 with Johanna that was not consensual on
16 Johanna's part?

17 MR. PAGLIUCA: You can answer
18 nonconsensual.

19 A. I've never had nonconsensual sex
20 with anybody.

21 Q. Not Annie Farmer?

22 MR. PAGLIUCA: Objection.

23 A. I just testified I never had
24 nonconsensual sex with anybody ever, at any
25 time, at anyplace, at any time, with anybody.

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2 Q. So if Johanna were to testify that
3 she did not consent to a sexual act that you
4 participated in --

5 A. I just told you I have never ever
6 under any circumstances with anybody, at any
7 time, in anyplace, in any form had
8 nonconsensual relations with anybody.

9 Q. Did you introduce Johanna to Prince
10 Andrew?

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

13 A. I've, again, read that Johanna
14 claimed that she met or that she said she met
15 Prince Andrew. I don't know if I was the one
16 who made the introduction or not.

17 Q. Do you know a female by the name of
18 Emmy Taylor?

19 A. I do.

20 Q. How do you know her?

21 A. Emmy was my assistant.

22 Q. So she worked for you?

23 A. Yes.

24 Q. Did you hire her?

25 A. Again, Jeffrey hired people.

Questions About Emmy, Virginia, and Ms. Maxwell Regarding Sex

1 G Maxwell - Confidential

2 consensual issue involved, I instruct
3 you not to answer.

4 A. Moving on.

5 Q. So you are refusing to answer that
6 question?

7 A. I've been instructed by my lawyer.

8 Q. Did you ever have sex with Jeffrey,
9 Emmy, Virginia and yourself when Virginia was
10 underage?

11 A. Absolutely not.

12 MR. PAGLIUCA: We've been going for
13 about an hour. I would like to take a
14 five-minute break, please.

15 MS. McCAWLEY: I'm almost done.

16 MR. PAGLIUCA: You are not going to
17 allow a break.

18 MS. McCAWLEY: As soon as I get
19 through my line of questioning, which is
20 perfectly appropriate.

21 Q. Did Emmy Taylor travel with you and
22 Jeffrey to Europe?

23 A. I'm sure she did.

24 Q. What is she doing today?

25 A. I have no idea.

Questions About Outfits and Sex Toys

1 G Maxwell - Confidential

2 about.

3 Q. So you didn't provide her with
4 that?

5 A. As I just testified, I have no idea
6 what you are talking about.

7 Q. I was trying to interpret whether
8 you didn't understand what a school girl
9 outfit was or you are saying that didn't
10 happen?

11 A. I clearly know what a school girl
12 outfit is. I have no recollection of
13 providing anybody with a school girl outfit.

14 Q. Did you have a set of outfits used
15 by the massage therapists that would include
16 things like a school girl outfit or a black
17 patent leather outfit or anything of that
18 nature?

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

21 A. That would be just another one of
22 Virginia's lies.

23 Q. You didn't have anything like that?

24 A. I did not.

25 Q. Did you have a basket of sex toys

1 G Maxwell - Confidential

2 that you kept in the Palm Beach house?

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

5 A. First of all what do you mean.

6 Q. A laundry basket that contained sex
7 toys in it?

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

10 A. Can you ask the question again?

11 Q. Did you have a laundry basket that
12 contained sex toys in it, in the Palm Beach
13 House?

14 MR. PAGLIUCA: Objection to the
15 form and foundation.

16 Q. Did you have a laundry basket of
17 sex toys in the Palm Beach house?

18 MR. PAGLIUCA: Same objection.

19 Q. You can answer.

20 A. I don't recollect anything about a
21 laundry basket of sex toys.

22 Q. Do you recollect having sex toys at
23 the Palm Beach house?

24 A. You have to define what are you
25 talking about.

Questions About Plaintiff and Epstein and Sex

1 G Maxwell - Confidential

2 Q. Do you recall having a basket full
3 of sex toys?

4 A. I already told you I did not.

5 Q. We were talking a moment ago about
6 Ms. Roberts and her position as a masseuse,
7 do you know what she was paid for working as
8 a masseuse for Jeffrey Epstein?

9 A. I do not.

10 Q. Did you ever pay her?

11 A. I don't ever recall paying her.

12 Q. Do you know what happened during
13 the massage appointments with Jeffrey Epstein
14 and Virginia Roberts?

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

17 A. No.

18 Q. Were you ever present to view a
19 massage between Jeffrey Epstein and Virginia
20 Roberts?

21 A. I don't recollect ever seeing
22 Virginia and Jeffrey in a massage situation.

23 Q. Do you ever recollect seeing them
24 in a sexual situation?

25 A. I never saw them in a sexual

1 G Maxwell - Confidential

2 situation.

3 Q. Did you ever participate in sex
4 with Virginia Roberts and Jeffrey Epstein?

5 A. I never ever at any single time at
6 any point ever at all participated in
7 anything with Virginia and Jeffrey. And for
8 the record, she is an absolute total liar and
9 you all know she lied on multiple things and
10 that is just one other disgusting thing she
11 added.

12 Q. Did you help her obtain an
13 apartment in Palm Beach to live in?

14 MR. PAGLIUCA: Objection to the
15 form and foundation.

16 Q. Was that part of your
17 responsibilities for Jeffrey?

18 A. First of all, I didn't know she had
19 an apartment in Palm Beach. I only learned
20 that from the many times you guys have gone
21 to the press to sell stories, so no.

22 Q. Did you help her get a cell phone,
23 was that one of your responsibilities for
24 Jeffrey, to get her is a cell phone as part
25 of her masseuse obligations?

Questions About Training Plaintiff to Recruit Girls for Massages

1 G Maxwell - Confidential

2 form and foundation.

3 A. Like I told you, I don't recall her
4 being at the house at all.

5 Q. How many homes does Jeffrey have?

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

8 A. When I was working for him, I think
9 he had six maybe.

10 Q. Would Virginia stay with him in
11 those homes?

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

14 A. I can only testify for when I was
15 present with him and I cannot say what she
16 did when I wasn't present with him.

17 Q. When you were present, would
18 Virginia stay in the homes with him?

19 A. I don't recall her staying in the
20 houses.

21 Q. Did you train Virginia on how to
22 recruit other girls for massages?

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

25 A. No.

1 G Maxwell - Confidential

2 Q. Did you train Virginia on how to
3 recruit other girls to perform sexual
4 massages?

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

7 A. No. And it's absurd and her entire
8 story is one giant tissue of lies and
9 furthermore, she herself has -- if she says
10 that, you have to ask her about what she did.

11 Q. Does Jeffrey like to have his
12 nipples pinched during sexual encounters?

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

15 A. I'm not referring to any advice on
16 my counsel. I'm not talking about any adult
17 sexual things when I was with him.

18 Q. When Jeffrey would have a massage,
19 would he request that the masseuse pinch his
20 nipples while he was having a massage?

21 A. I'm not talking about anything with
22 consensual adult situation.

23 Q. What about with underage --

24 A. I am not aware of anything.

25 Q. You are not aware of Jeffrey

Questions About Ms. Maxwell's Relationship with Mr. Epstein

1 G Maxwell - Confidential

2 has perpetrated, cannot tell you what is true
3 or factual or not.

4 Q. You said you were in the home a
5 very limited time, so average in the year for
6 example, 2004, how many times would you have
7 been in his Palm Beach home?

8 A. Very hard for me to state but very
9 little.

10 Q. How about his New York home?

11 A. Same.

12 Q. Were you his girlfriend in that
13 year, in 2004?

14 A. Define what you mean by girlfriend.

15 Q. Were you in a relationship with him
16 where you would consider yourself his
17 girlfriend?

18 A. No.

19 Q. Did you ever consider yourself his
20 girlfriend?

21 A. That's a tricky question. There
22 were times when I would have liked to think
23 of myself as his girlfriend.

24 Q. When would that have been?

25 A. Probably in the early '90s.

Questions About Recruiting Girls, an Underage Girl in London,
and Foreign Girls

1 G Maxwell - Confidential

2 A. First of all I resent and despise
3 the world recruit. Would you like to define
4 what you mean by recruit and by girls, you
5 mean underage people. I never had to do
6 anything with underage people. So why don't
7 you reask the question in a way that I am
8 able to answer it.

9 Q. I'm asking if you ever said that to
10 anybody. So if you don't understand the word
11 recruit and you never used that word then the
12 answer to that question would be no.

13 A. I have no memory as I sit here
14 today having used that word.

15 Q. Did you ever meet an underage girl
16 in London to introduce her to Jeffrey to
17 provide him with a massage?

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

20 A. Run that past me one more time.

21 Q. Did you ever meet an underage girl
22 in London to introduce her to Jeffrey to
23 perform a massage?

24 MR. PAGLIUCA: Same objection.

25 A. Are you asking me if I met anybody

1 G Maxwell - Confidential

2 that was underage in London specifically to
3 provide a massage to Jeffrey, is that your
4 question?

5 Q. Yes.

6 A. No.

7 Q. Do you know who Alexander Dixon is?

8 A. I don't recall her right now.

9 Q. Do you know if -- strike that.

10 During the time that you were
11 working for Jeffrey, did you ever observe any
12 foreign females, so in other words, not from
13 the United States, that were brought to
14 Jeffrey's home to perform massages?

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

17 A. Females, what age are we talking?

18 Q. Any age.

19 A. Can you repeat the question?

20 Q. During the time you were working
21 for Jeffrey, did you ever observe any foreign
22 females of any age that were at Jeffrey's
23 home to perform a massage?

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

1 G Maxwell - Confidential

2 A. Are you asking me if any foreigner,
3 not an American person, gave Jeffrey a
4 massage?

5 Q. Yes.

6 A. Well, as I sit here today, I can't
7 think of anyone who is foreign. Certainly --
8 I just can't think of anybody right this
9 second.

10 Q. How about any foreign girls who
11 were under the age of 18?

12 A. I already testified to not knowing
13 anything about underage girls.

14 Q. Were there foreign girls who were
15 brought to Jeffrey's home by Jean Luc Brunel
16 for the purposes of providing massages?

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

19 A. I am not aware of Jean Luc bringing
20 girls. I have not no idea what you are
21 talking about.

22 Q. You have never been around foreign
23 girls who are under the age of 18 at
24 Jeffrey's homes?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I already testified about not
4 knowing about underage girls.

5 Q. Did you provide any assistance with
6 obtaining visas for foreign girls that were
7 under the age of 18?

8 A. I've never participated in helping
9 people of any age to get visas.

10 Q. Did Jeffrey, was it Jeffrey's
11 preference to start a massage with sex?

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

14 A. I think you should ask that
15 question of Jeffrey.

16 Q. Do you know?

17 A. I don't believe that was his
18 preference. I think -- you have to
19 understand, a massage -- perhaps you are not
20 really familiar with what massage is.

21 Q. I am, I don't need a lecture on
22 massage.

23 A. I think you do.

24 MR. PAGLIUCA: No question pending.

25 She will ask you another question now.

Questions About Underage Girls, Sex with Jon Luc Brunel, and Outfits

1 G Maxwell - Confidential

2 Q. Were you present on the island when
3 Prince Andrew visited?

4 A. Yes.

5 Q. How many times?

6 A. I can only remember once.

7 Q. Were there any girls under the age
8 of 18 on the island during that one visit
9 that you remember that were not family or
10 friends of or daughters of your friends?

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

13 A. There were no girls on the island
14 at all. No girls, no women, other than the
15 staff who work at the house. Girls meaning,
16 I assume you are asking underage, but there
17 was nobody female outside of the cooks and
18 the cleaners.

19 Q. Did you, as part of your duties in
20 working for Jeffrey, ever arrange for
21 Virginia to have sex with John Luc Brunel?

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

24 A. Just for the record, I have never
25 at any time, at anyplace, in any moment ever

1 G Maxwell - Confidential

2 asked Virginia Roberts or whatever she is
3 called now to have sex with anybody.

4 Q. Did you ever provide Virginia
5 Roberts with an outfit, an outfit of a sexual
6 nature to wear for Les Wexner?

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

9 A. I think we addressed the outfit
10 issue.

11 Q. I am asking you if you ever
12 provided her with an outfit of a sexual
13 nature to wear for Les Wexner?

14 A. Categorically no. You did get
15 that, I said categorically no

16 Q. Don't worry I'm paying attention.

17 A. You seemed very distracted in that
18 moment.

19 (Maxwell Exhibit 6, flight logs,
20 marked for identification.)

21 A. Do you mind if I take a break for
22 the bathroom.

23 Q. It's 11:08 and we are going to go
24 off the record now.

25 THE VIDEOGRAPHER: It's now 11:09.

Questions About Pictures of Naked Girls

1 G Maxwell - Confidential

2 people could use -- just like you would use
3 if you needed to go online to get something,
4 that people could use.

5 Q. Was that on a desk that you would
6 use in your work capacity when you were at
7 the house?

8 A. It was a desk, it was a room I was,
9 I didn't really use that computer.

10 Q. Were there images of naked girls
11 whether they be under the age of 18 or over
12 the age of 18 on that computer?

13 A. I have no recollection of any naked
14 people on that computer when I was there in
15 2003, we are talking.

16 Q. What about from say '99 to 2003?

17 A. No, I can't recollect any naked
18 pictures.

19 Q. Why were the computers removed from
20 the house before the search warrant was
21 executed?

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

24 A. I have no knowledge of anything
25 like that.

Questions About Topless Females

1 G Maxwell - Confidential

2 form and foundation.

3 A. I mean I've been to his -- in the
4 mid '90s, I would have communicated with
5 people who worked for him.

6 Q. Have you communicated with Leslie
7 Wexner about this case?

8 A. No.

9 Q. Have you ever seen a topless female
10 at any one of Jeffrey Epstein's properties?

11 MR. PAGLIUCA: Objection to the
12 form and foundation. You've asked this
13 question, by the way, earlier on today.

14 A. Again, I testified that there are
15 people who from time to time in the privacy
16 of a swimming pool have maybe taken a bikini
17 top off or something but it's not common and
18 certainly when I was at the house I don't
19 really recollect seeing that kind of
20 activity.

21 Q. Have you ever smoked cigarettes?

22 A. Yes.

23 Q. Have you ever smoked cigarettes
24 with Virginia Roberts?

25 A. I don't recall smoking cigarettes

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S UNREDACTED REPLY IN SUPPORT OF MOTION TO COMPEL
DEFENDANT TO ANSWER DEPOSITION QUESTIONS**

Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this Reply in Support of her Motion to Compel Defendant to Answer Deposition Questions. Instead of allowing Ms. Giuffre to take a full and complete deposition, Defendant flatly refused to answer questions critical to the key issues in this case. Contrary to Defendant's assertions, Ms. Giuffre is not engaged in a "fishing expedition" but rather seeks to ask highly-focused questions specifically relevant to this case. In particular, Ms. Giuffre seeks to ask the Defendant questions regarding her participation in or knowledge of sexual activities connected with Jeffrey Epstein's sexual abuse of females. Such questions are entirely appropriate in the discovery phase of this case, particularly where any answers will be maintained as confidential under the Protective Order entered in this case.

As the Court is aware from previous pleadings, at the heart of this case lies the issue of Defendant's knowledge that Ms. Giuffre was sexually abused by Jeffrey Epstein. Indeed, as the Defendant boldly acknowledges in her response (at p. 2), she intends to argue at trial that (among other things) she "never arranged for or asked [Ms. Giuffre] to have sex with anyone." At trial,

Ms. Giuffre intends to strongly disprove Defendant's false assertions and to demonstrate that Defendant recruited Ms. Giuffre to be involved in massages of a sexual nature with Epstein.

To develop evidence to support her position, Ms. Giuffre recently deposed Defendant about the central subjects in her case. Defendant flatly refused to answer a number of questions, and for the majority of the others, gave varying versions of "I don't recall." For example, when faced with the police report which contains statements from approximately thirty (30) different victims during a time frame which the Defendant acknowledges she was actively working for Epstein at his various homes, Defendant challenged the veracity of the victims' reports:

"Q. Are you saying these 30 girls are lying when they gave these reports to police officers?

A. I'm not testifying to their lies. I'm testifying to Virginia's lies."

See Declaration of Sigrid McCawley ("McCawley Decl.") at Exhibit 1, April 22, 2016

Deposition of Defendant at p. 89-90; 83-84. While Defendant was working with Epstein during the time period when these underage girls were visiting Jeffrey's home, Defendant claimed to be at the house maybe once in 2005. *Id.* at p. 84. Yet, according to flight manifests, in that same general time period, Defendant was listed as a passenger at least eleven times either landing in or departing from West Palm Beach, Florida on Jeffrey Epstein's private plane. *See* McCawley Decl. at Exhibit 1, April 22, 2016 Depo Tr. at p. 84; *see also* McCawley Decl. at Composite Exhibit 2, Flight Logs from Jeffrey Epstein's private planes.

Moreover, again according to flight logs, Defendant was on Epstein's planes over 300 times – including 23 times with Ms. Giuffre when Ms. Giuffre was underage. Yet, quite remarkably, Defendant claimed she "couldn't recall" even one of those flights. *See* McCawley Decl. at Exhibit 1, April 22, 2016 Deposition of Defendant at p. 120-122.

Defendant even testified that she did not recall having Ms. Giuffre at her London townhome with Prince Andrew. Defendant stuck to this incredible story despite flight logs establishing her traveling to London with Ms. Giuffre and despite a photograph the three – Ms. Giuffre, Prince Andrew and Defendant – all standing together in Defendant’s home. *See* McCawley Decl. at Exhibit 1, April 22, 2016 Deposition of Defendant at p. 108-111. Defendant’s deposition consisted almost entirely of “I don’t recall” or “I refuse to answer that question”¹ and also included a physical outburst that knocked the court reporter’s computer off the conference room table. *See* McCawley Decl. at Exhibit 1, April 22, 2016 Deposition of Defendant at 207-208.

Among the many questions that Defendant refused to answer at her deposition were a number of questions designed to show that Defendant was well aware that, for Epstein, a “massage” was actually a code word sexual activity – i.e., not a therapeutic massage but rather activity that involved sexual gratification for Epstein. Defendant refused to answer all such questions, asserting that they involved “private adult sexual relationships” which did not “relate in any way” to Ms. Giuffre’s claims. *Id.* at p. 4. But Defendant’s involvement in such “relationships” with Epstein would show that she knew full well the fate that was in store for Ms. Giuffre when she accepted Defendant’s invitation to come and provide “massages” to Epstein. Defendant admitted that she worked for Epstein from 1992 to 2009. *See* McCawley Decl. at

¹ For example, when asked:

“Q. Have you ever said to anybody that you recruit girls to take the pressure off you, so you won’t have to have sex with Jeffrey, have you said that?”

A. ***You don’t ask me questions like that.*** First of all, you are trying to trap me, I will not be trapped. You are asking me if I recruit. I told you no. Girls meaning underage, I already said I don’t do that with underage people and as to ask me about a specific conversation I had with language, we talking about almost 17 years ago when this took place. ***I cannot testify to an actual conversation or language that I used with anybody at any time.***”

See McCawley Decl. at Exhibit 1, April 22, 2016 Depo Tr. at p. 94-95.

Exhibit 1, April 22, 2016 Deposition of Defendant at p. 10-11, 410. As the Court knows, the Palm Beach Police Report demonstrates multiple incidents of “massages” being given by untrained minor children that involved sexual acts. *See* McCawley Decl. at Exhibit 3, Palm Beach Police Report. Defendant is also identified in that Palm Beach Police Report. *See* McCawley Decl. at Exhibit 3, Palm Beach Police Report at p. 75-76. And the details of Epstein’s sexual activities with Defendant (for example) are highly relevant to this case, because they will help corroborate Ms. Giuffre’s testimony that, while she was underage, she also engaged in sexual activity of an identical nature with Epstein.

To allow Defendant to avoid answering these questions would preclude Ms. Giuffre from getting critical evidence in this case. Consider, for example, Defendant recruiting an eighteen year-old girl to be an “assistant,” bringing that girl to Epstein’s home, telling her she could make more money if she would give Epstein a massage, and then instructing her to give a massage that involved sexual acts. Under Defendant’s theory of discovery, Ms. Giuffre would be precluded from deposing her on that topic because the actions would culminate in “consensual adult sex.” Yet, that scenario would fully validate the pattern of events that occurred with Ms. Giuffre when she was under the age of eighteen. It would obviously show a “modus operandi” by Jeffrey Epstein and Defendant, which is clearly admissible under Fed. R. Evid. 404(b).

Moreover, such inquiries are crucial to impeaching the Defendant at trial. During her deposition, Defendant attempted to characterize her work for Epstein as nothing more than a normal job handling hiring for the various mansions. *See* McCawley Decl. at Exhibit 1, April 22, 2016 Deposition Tr. of Defendant at p. 9-12. Ms. Giuffre should be able to contest that assertion by having Defendant fully answer questions about whether that alleged “job” involved

sexual activities, including orchestrating the hiring of females and converting massages into sexual encounters.

Defendant attempts to paint the picture that Ms. Giuffre somehow is interested in all sexual relationships that the Defendant may have been involved with. That is not true. Ms. Giuffre has no intention of asking unbridled questions. To be clear, Ms. Giuffre intends to ask Defendant only questions that involve the following very narrow and crucial subject areas: (1) Defendant's sexual relationship with Epstein from 1992 to 2009 – the time period in which she worked for Jeffrey Epstein and which Epstein (with the assistance of Defendant) was engaging in sexual acts with females under the cover of "massage"; (2) Defendant's sexual interactions with any person in Epstein's presence during that time period; (3) Defendant's sexual activities at Epstein's residences, including his private island "Little St. Jeff's," or his aircraft during that time period; (4) Defendant's sexual activities with identified participants in Epstein's sexual abuse during that time period; and (5) Defendant's sexual interactions that occurred during or through what began as a "massage"; and (6) Defendant's interactions with females to introduce to Jeffrey Epstein for the purpose of performing work, including sexual massages.

Defendant claims that such questions are a mere "fishing expedition" without acknowledging the fact that these questions go to critical issues in this case. Other witnesses have testified regarding Defendant's involvement in recruiting females for sex under the cover of a "massage." During the investigation of Jeffrey Epstein, certain household staff was deposed. Alfredo Rodriguez, who was Jeffrey Epstein's household manager, testified that the Defendant frequently stayed in Jeffrey Epstein's home and assisted with bringing in young girls to act as "masseuses" for Jeffrey Epstein.

Q. "Okay. Going back to where we started here was, does Ghislaine Maxwell have knowledge of the girls that would come over to Jeffrey Epstein's house that are in

roughly the same age group as C. and T. (minor children) and to have a good time as you put it?

A. Yes.

Q. And what was her involvement and/or knowledge about that?

A. She knew what was going on.”

See McCawley Decl. at Exhibit 4, Alfredo Rodriguez July 29, 2009 Dep. Tr. at 176-177. *See*

also McCawley Decl. at Exhibit 4, Alfredo Rodriguez July 29, 2009 Depo Tr. at 96-101 (noting

that high school age girls come to the home where Jeffrey Epstein and Ms. Maxwell reside).

Juan Alessi, another household employee, also testified that young girls were regularly present at

Jeffrey Epstein’s home where Ghislaine Maxwell resides. *See* McCawley Decl. at Exhibit 5,

Juan Alessi November 21, 2005 Sworn Statement at p. 15-16, 21. Specifically, Juan Alessi

informed the Palm Beach Police Detective as follows: “Alessi stated that towards the end of his

employment, the masseuses were younger and younger. When asked how young, Mr. Alessi

stated they appeared to be sixteen or seventeen years of age *at most*.” (emphasis added.) *See*

McCawley Decl. at Exhibit 3, Palm Beach Police Report at p. 57.

During Juan Alessi’s November 21, 2005 Sworn Statement taken by the Palm Beach

Police Department, Mr. Alessi revealed that girls would come over to give “massages” and he

observed Ms. Maxwell going upstairs in the direction of the bedroom quarters. *See* McCawley

Decl. at Exhibit 5, Juan Alessi November 21, 2005 Sworn Statement at 10. He also testified that

after the massages, he would clean up sex toys that were kept in “Ms. Maxwell’s closet.” *Id.* at

11-13. *See also* McCawley Decl. at Exhibit 6, Juan Alessi September 8, 2009 Depo Tr. at p. 76-

77. He added that he and his wife were concerned with what was going on at the house (*Id.* at

14) and that he observed girls at the house, including one named “Virginia.” *Id.* at 21.

Mr. Rodriguez also testified that Defendant also had naked pictures of girls performing

sexual acts on her computer. *See* McCawley Decl. at Exhibit 7, Alfredo Rodriguez August 7,

2009 Dep. Tr. at 311-312; *See also* McCawley Decl. at Exhibit 6, Juan Alessi September 8, 2009

Depo Tr. at p. 40-41 (“I know she [Maxwell] went out and took pictures in the pool because later on I would see them at the desk or at the house. And nude - 99.9 percent of the time they were topless. They were European girls.”).

Q. “Did they appear to be doing any sexual?

A. Yes, ma’am.

Q. And in these instances were there girls doing sexual things with other girls?

A. Yes, ma’am.

Q. And I’m still talking about the pictures on Ms. Maxwell’s computer.

A. Yes, ma’am.”

Upon leaving his employment, Rodriguez testified that Defendant threatened him that he should not tell anyone about what happened at the house:

A. “I have to say something. Mrs. Maxwell called me and told me not to ever discuss or contact her again in a threaten(ing) way.

Q. When was this?

A. Right after I left because I call one of the friends for a job and she told me this, but, you know, I feel intimidated and so I want to keep her out...

Q. She made a telephone call to you and what precisely did she say?

A. She said I forbid you that you’re going to be – that I will be sorry if I contact any of her friends again...She said something like don’t open your mouth or something like that. I’m a civil humble, I came as an immigrant to service people, and right now you feel a little –I’m 55 and I’m afraid. First of all, I don’t have a job, but I’m glad this is on tape because I don’t want nothing to happen to me. This is the way they treat you, better do this and you shut up and don’t talk to nobody and—

Q. When you say this is the way they treat, who specifically are you talking about when you say that word they?

A. Maxwell. ”

See McCawley Decl. at Exhibit 4, Alfredo Rodriguez July 29, 2009 Dep. Tr. at 169 – 172.

In sum, at the core of this case are statements made by Ms. Giuffre that she was recruited, by Defendant, to be paid as a masseuse, yet was enticed or coerced into engaging in sexual acts with Epstein and Defendant for money. She has further explained that the recruitment of females through the offer of some legitimate position was the typical way in which Defendant and Epstein lured unsuspecting females to the house before converting the relationship into a sexual

one. Ms. Giuffre has described the frequency of these “massages”, the sexual tendencies of the participants, the manner in which the massages became sexual in nature, and Defendant’s role at each stage.

In response, Defendant has called Ms. Giuffre’s entire account “untrue” and “obvious lies.” Defendant has instead tried to portray her role as nothing more than an Epstein employee performing typical household management duties. Any personal knowledge Defendant has of Epstein’s sexual tendencies, habits, and use of massage for sex is entirely relevant to either corroborate Ms. Giuffre’s account. Likewise, Defendant’s participation in any sexual acts with Epstein, in his presence, on his properties, using his mode of converting massages into sex, or with females will directly corroborate Ms. Giuffre’s account. On the other hand, without access to the answers to these inquiries, Ms. Giuffre will be unable to expose the bias of Defendant, unable to thoroughly cross-examine Defendant’s position that she was just a lowly employee, and most importantly unable to demonstrate through the Defendant’s own admissions that Ms. Giuffre’s statements about Epstein and Defendant were absolutely true – and not “obvious lies.”

Finally, Defendant fails to recognize that, for the discovery purposes at issue here, relevance “is an extremely broad concept.” *Am. Fed’n of Musicians of the United States & Canada v. Sony Music Entm’t, Inc.*, No. 15CV05249GBDBCM, 2016 WL 2609307, at *3 (S.D.N.Y. Apr. 29, 2016). And once relevance is shown, “the party resisting discovery bears the burden of demonstrating that, despite the broad and liberal construction afforded the federal discovery rules, the requests are irrelevant, or are overly broad, burdensome, or oppressive.” *Id.* Here, the requests are not “overly broad” as Ms. Giuffre’s specific explanations of the targets of her questions make clear. Moreover, answering the questions is not “oppressive,” particularly given the fact that Defendant has placed *all* substantive aspects of the Deposition under seal. Of

course, once Defendant answers the question – and her answers are placed under seal – the parties can file any further motions that may be required to determine whether the answers may be introduced at trial.

CONCLUSION

Defendant should be ordered to answer questions regarding sexual activity connected with Epstein's sexual abuse and sexual trafficking organization as specifically identified above

Dated: May 11, 2016

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of May, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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