

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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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.

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21 Also Present:
22 James Christe, videographer
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THE VIDEOGRAPHER: We are now on the record and recording. This begins disk No. 1 in the deposition of Ghislaine Maxwell in the matter of Virginia Giuffre versus Ghislaine Maxwell in the U.S. District Court for the Southern District of New York.

Today is April 22, 2016 the time is 9:04 a.m.. This deposition is being taken at 575 Lexington Avenue in New York at the request of Sigrid McCawley of Boies Schiller & Flexner.

The videographer is James Christe and the court reporter is Leslie Fagin. Will counsel state their appearance and whom they represent and then court reporter swear in Ms. Maxwell.

MS. MCCAWLEY: My name is Sigrid McCawley with my colleague Meredith Schultz. We are with Boies Schiller & Flexner. We represent Ms. Giuffre.

MR. EDWARDS: Brad Edwards. I also represent Ms. Giuffre.

MR. CASSELL: Paul Cassell, I also

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2 represent Ms. Giuffre.

3 MR. PAGLIUCA: Jeff Pagliuca and

4 Laura Menninger on behalf of Ms.

5 Maxwell.

6 G H I S L A I N E M A X W E L L, called

7 as a witness, having been duly sworn by a

8 Notary Public, was examined and testified as

9 follows:

10 EXAMINATION BY

11 MS. McCAWLEY:

12 Q. Good morning. I'm going to explain

13 some of the rules that will happen with

14 respect to depositions.

15 Have you ever been deposed before?

16 A. I have not.

17 Q. What is going to happen here, we

18 have a court reporter and a videographer.

19 What they do is take down the words that we

20 say so when I ask you a question they will

21 record what you say in response to that. So

22 we have to be mindful that in order for them

23 to do their job we can't talk over each

24 other.

25 Another issue you have to be weary

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2 It's in the process of being sold. It still
3 requires some final paperwork to be done, so
4 just for the purposes of clarity.

5 Q. Do you have a new address where you
6 will be living?

7 A. I do not.

8 Q. For the purpose of the record, if
9 there is something I ask you that you later
10 remember something else or need to correct
11 your testimony in some way, you can do that,
12 just let me know what it is and we will go
13 back to that question and can you clarify.

14 A. Of course. I just wanted to be
15 clear, there is still some paperwork pending
16 for final release, but it's in the process of
17 sale. But I don't have another address
18 currently, so whilst that should still be of
19 record that the mail could be forwarded
20 there, so for purposes of clarity I wanted to
21 be clear.

22 Q. I appreciate that.

23 So Ms. Maxwell, when did you first
24 recruit a female to work for Mr. Epstein?

25 MR. PAGLIUCA: Again. I object to

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2 form and foundation of the question.

3 Q. You can answer the question.

4 A. First of all, can you please
5 clarify the question. I don't understand
6 what you mean by female, I don't understand
7 what you mean by recruit. Please be more
8 clear and specific about what you are
9 suggesting.

10 Q. Are you a female, is that the sex
11 that you are?

12 A. I am a female.

13 Q. That's what I'm referring to a
14 female and I'm asking you when you first, the
15 very first time you recruited a female to
16 work for Mr. Epstein?

17 A. Again, I don't understand what
18 female -- I am a 54 year old women.

19 Q. I'm not making it age, any age of a
20 female that you recruited to work for Mr.
21 Epstein?

22 A. Again, I was somebody who hired a
23 number of people to work for Mr. Epstein and
24 hiring is one of my functions.

25 Q. And when is the first time you

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2 Any female under the age of 18, did
3 you invite them to come to Jeffrey's home?

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

6 A. Again, as I said, I am not aware of
7 inviting anybody other than friends of mine
8 who have children to the house.

9 Q. Did you invite Virginia Giuffre to
10 come to Jeffrey Epstein's home when she was
11 under the age of 18?

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

14 A. Virginia Roberts held herself out
15 as a masseuse and invited herself to come and
16 give a massage.

17 Q. My question is, did you invite
18 Virginia Roberts when she was under the age
19 of 18 to come to Jeffrey Epstein's home?

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

22 A. Again, Virginia Roberts was a
23 masseuse --

24 Q. I'm asking not asking if she was a
25 masseuse. I'm asking if you invited her to

1 G Maxwell - Confidential

2 come to Jeffrey Epstein's home?

3 A. Again, there would be no course to
4 have a conversation with Virginia unless she
5 held herself out to be a masseuse.

6 Q. I'm not asking that question. I'm
7 asking if you invited her to come to Jeffrey
8 Epstein's home when she was under the age of
9 18?

10 A. Again, I repeat, she was a masseuse
11 and in the form and as my job, I was to have
12 people who he wanted for various things
13 including massage. She came as a masseuse.

14 Q. So you invited her to his home to
15 come to give a massage, is that correct?

16 MR. PAGLIUCA: Object to the form
17 and foundation. Misstates the witness'
18 testimony.

19 A. Again, I did not invite Virginia
20 Roberts. She came as a masseuse.

21 Q. She who invited her to come as a
22 masseuse, she just showed up at the front
23 door?

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

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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 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 therapists paid?

3 MR. PAGLIUCA: Object to the form

4 and foundation.

5 A. They get paid between 100 and \$200.

6 Q. Did it vary based on what sexual

7 acts they performed?

8 MR. PAGLIUCA: Object to the form

9 and foundation.

10 A. No. It varied depending how much
11 time, some massage therapists charge more and
12 some charge less.

13 Q. Did the massage therapists that
14 were hired to come to the home perform sexual
15 acts for Jeffrey Epstein?

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

18 A. What are you asking me?

19 Q. I'm asking if the massage
20 therapists --

21 A. Are you asking me about underage
22 girls?

23 Q. I'm asking in general, did any of
24 the massage therapists in the home --

25 A. Are you asking if they were paid

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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.

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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 [REDACTED]?

19 A. I am.

20 Q. Has [REDACTED] given a statement
21 to police about you performing sexual acts on
22 her?

23 A. I have not heard that.

24 Q. Has [REDACTED] given a statement
25 to police about Jeffrey Epstein performing

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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 Q. I'm asking the questions. I know
3 what this case is about. I'm trying to -- I
4 will ask you questions if you don't
5 understand the question I can break it down
6 for you. I'm happy to do that.

7 A. Break it down a lot please.

8 Q. I will do that.

9 The question is, have you ever said
10 to anybody that you recruit other girls --

11 A. Why don't you stop there.

12 Q. Let me finish my question.

13 Have you ever said to anybody that
14 you recruit girls to take the pressure off
15 you, so you won't have to have sex with
16 Jeffrey, have you said that?

17 That's the question?

18 A. You don't ask me questions like
19 that. First of all, you are trying to trap
20 me, I will not be trapped. You are asking me
21 if I recruit, I told you no. Girls meaning
22 underage, I already said I don't do that with
23 underage people and as to ask me about a
24 specific conversation I had with language, we
25 talking about almost 17 years ago when this

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2 took place. I cannot testify to an actual
3 conversation or language that I used with
4 anybody at any time.

5 Q. Have you ever said to anybody that
6 you recruit other females over the age of 18
7 to take the pressure off you to having to
8 have sex with Jeffrey?

9 A. I totally resent and find it
10 disgusting that you use the word recruit. I
11 already told you I don't know what you are
12 saying about that and your implication is
13 repulsive.

14 Q. Answer my question.

15 A. I just did.

16 Q. Have you ever said to anybody that
17 you recruit females --

18 A. I don't recruit anybody.

19 Q. That's an answer. So you never
20 said that?

21 A. I'm testifying that I cannot
22 testify to an actual language --

23 Q. It's a yes or no.

24 A. I will not testify to an actual
25 statement made 17 years ago, so I cannot

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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 [REDACTED] 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 [REDACTED] is?

15 A. I do.

16 Q. How do you know him?

17 A. He used to work or still works for

18 [REDACTED]

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

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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 [REDACTED] 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 [REDACTED], 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 more time because I want you to be able to
3 understand it.

4 Knowing that you have the police
5 report here and knowing about the criminal
6 investigation, do you believe that Jeffrey
7 Epstein sexually abused minors?

8 MR. PAGLIUCA: Same objection.

9 A. I know what you put in front of me
10 and I know what I read.

11 Q. I'm asking what you believe, do you
12 believe Jeffrey Epstein sexually abused
13 minors?

14 A. I can only tell you what I read and
15 what you showed me.

16 Q. I'm asking what you believe, from
17 your own belief, do you believe that Jeffrey
18 Epstein abused minors?

19 A. I can only go from what I know
20 personally and what I know personally about
21 what Virginia's lies talked about. She is
22 the only person I know that actually claimed
23 that. And I can say with certitude that
24 everything Virginia said was a lie.

25 Q. You are aware Jeffrey Epstein was

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2 sentenced for sexual abuse, are you aware of
3 that?

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

6 Q. Are you aware that Jeffrey Epstein
7 served time for sexual abuse of a minor?

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

10 A. I don't believe that's what he was
11 sentenced for, actually.

12 Q. So you don't know that Jeffrey
13 Epstein served time for sexually abusing a
14 minor?

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

17 A. I don't believe that's what he was
18 sentenced for.

19 Q. Do you know that Jeffrey Epstein
20 was convicted for procuring a minor for
21 prostitution?

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

24 A. I don't know exactly what he was
25 convicted of. I don't know that he was

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2 convicted. I know he spent time in jail.

3 Q. Do you know that he spent time in
4 jail related to an issue with a minor child?

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

7 A. I did not know that.

8 Q. What did you think he was spending
9 time in jail for?

10 A. I only know he went to jail for --
11 it was alleged that he hired -- had an
12 underage prostitute.

13 Q. So knowing that, do you believe
14 that Jeffrey Epstein sexually abused minors?

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

17 A. I can only tell you what he went to
18 jail for.

19 Q. I'm asking what you believe. I'm
20 not asking what he went to jail for. I'm
21 asking for your belief.

22 A. I cannot testify to what I believe.
23 I can only say what I have seen in the
24 reports and I know he went to jail.

25 Q. You can testify to what you

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2 sexually abused any minor children?

3 A. Again, I only know 1000 percent
4 that Virginia is a liar. I can only talk to
5 Virginia, her lies and your inappropriate,
6 unethical, really unattractive, terrible use
7 of her and the way that you have abused the
8 system, used the press for purposes that are
9 unethical, inappropriate and appalling.

10 Q. Do you believe that Jeffrey Epstein
11 used massages to lure minors to have sex with
12 him?

13 A. Again, that is Virginia's
14 testimony, which is a lie.

15 Q. But do you believe that?

16 A. Again, I refer back to Virginia.

17 Q. I'm asking whether you believe it
18 or not?

19 A. I can only go with what I know and
20 I know Virginia is a liar and therefore
21 that's a lie.

22 Q. So you don't believe that?

23 A. I said, I only know that Virginia
24 is lying.

25 Q. Are you aware that Jeffrey Epstein

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2 is a registered sex offender?

3 A. I am.

4 Q. Are you aware that Jeffrey Epstein
5 paid considerable amounts of money to settle
6 lawsuits with the minor children that he had
7 sexual contact with?

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

10 A. I have no knowledge of those
11 issues.

12 Q. Why did you continue to maintain
13 contact with Jeffrey Epstein after he pled
14 guilty?

15 A. I'm a very loyal person and Jeffrey
16 was very good to me when my father passed
17 away and I believe that you need to be a good
18 friend in people's hour of need and I felt
19 that it was a very thoughtful, nice thing for
20 me to do to help in very limited fashion
21 which was helping if he had any issue with
22 his homes, in terms of the staffing issues.
23 It was very, very minor but I felt it was
24 thoughtful in somebody's hour of need.

25 Q. Did he continue to pay you during

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2 that time period?

3 A. I was paid a little.

4 Q. You were paid?

5 A. Yes.

6 Q. When you say a little, what you did
7 mean by that?

8 A. I don't recall exactly the amount.

9 Q. So in 2009 when you left him, what
10 were you being paid?

11 A. I just told you, I don't recall.

12 Q. Were you being paid \$100,000?

13 A. I just don't you I don't recall.

14 Q. Were you paid over a million
15 dollars?

16 A. I think I would remember over a
17 million dollars.

18 Q. So it was under a million dollars?

19 A. It was under a million dollars.

20 Q. Was it over \$500,000?

21 A. I just told you, it was under 500,
22 it was an amount of money less than \$500,000,
23 less than a million dollars and I did it out
24 of thoughtfulness and consideration for
25 somebody who was in trouble.

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2 Q. Did you have an attorney to consult
3 with during the criminal investigation of
4 Jeffrey Epstein?

5 A. I don't believe I did.

6 Q. When did you learn that a search
7 warrant was executed for the Palm Beach
8 house?

9 A. I don't recall exactly.

10 Q. Were you present at the house in
11 advance of the search warrant being executed?

12 MR. PAGLIUCA: Object to the form
13 of the question.

14 A. I don't remember when the search
15 warrant was executed and I don't remember the
16 year that the search warrant was executed and
17 whenever that was, I already testified, I was
18 very, very infrequently at the house. So
19 highly unlikely but I was there a couple of
20 days, I just don't know which days it was in
21 relation to the police situation.

22 Q. Did you have a computer at the Palm
23 Beach home that was a computer that you would
24 use?

25 A. No.

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2 I took of people would only have been
3 mainstream type magazine type photos and any
4 photos I took could have been very happily
5 and expected to be displayed on your parents'
6 mantel piece or grandparents' mantel piece.

7 Q. Is it a lie that you approached
8 females to bring them to Jeffrey Epstein?

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

11 A. Please ask the question, again.

12 Q. Sure. Is it a lie that you
13 approached females to bring them to Jeffrey
14 Epstein?

15 A. I don't know what you are asking
16 me.

17 Q. I'm asking you, if it's a lie that
18 you approached females to bring them to
19 Jeffrey Epstein?

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

22 A. You are not asking me a good
23 question, sorry.

24 Q. You don't get to choose the
25 questions.

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2 A. I would like to answer your
3 questions but you are not asking me a
4 question that I can answer.

5 Q. What about that is causing you
6 pause where you can't answer the question?

7 A. You are trying to trap me and
8 that's not fair, so I already testified that
9 I hire people across the board, so I would
10 hire architects, decorators, pool people,
11 exercise instructors, gardeners, cooks,
12 chefs, cleaning people. So I, in the course
13 of a very long time when I would hire people
14 I hired people to work for Jeffrey. So I'm
15 happy to testify to hiring people for every
16 possible conceivable proper job that you
17 could conceive of within the context of
18 Jeffrey's life and homes.

19 Q. Is it a lie that you approached
20 females to bring them to Jeffrey Epstein for
21 the purpose of performing massages?

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

24 A. Again, I have already testified
25 that part of the job that I had was to hire

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2 lots of different types of people. In terms
3 of whatever -- very small part of my job,
4 Jeffrey enjoyed getting massages. I think
5 that is something we can all agree in this
6 room and within the context of that, very
7 infrequently I would go to spas and myself
8 happily receive a professional nonsexual
9 massage from a man and/or from a woman and if
10 that massage was something that I thought was
11 something that was good, I would ask if that
12 man or woman would come back and does home
13 visits. If that person said that they did,
14 they would sometimes come, from time to time,
15 not always, come back to the house to perform
16 a nonsexual professional male or female
17 massage.

18 Q. Were any of the exercise
19 instructors you hired under the age of 18?

20 A. Again, I don't hire, we've already
21 established that I don't hire people. I
22 interview people to see if they are competent
23 in the job that they do and/or whether they
24 are someone who seemed that they can do home
25 visits.

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2 At the point where I think that
3 there is somebody that has, can be either
4 whatever the job may be, pool, gardener, chef
5 and/or exercise instructor and I think they
6 could be good at whatever it is at whatever
7 skill that they had and they did a home visit
8 which would obviously be mandatory and Mr.
9 Epstein would meet with them and decide if he
10 wanted to have whatever skill it was that he
11 would do it and then he would then either
12 have them come back or hire them.

13 Q. Were there any exercise instructors
14 that worked at the home that were under the
15 age of 18?

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

18 A. Again, I keep coming back to this,
19 that the people that I employed or -- not the
20 right word, the people I would meet to come
21 and work at the house, under any guise
22 whatsoever, again, from any of the many
23 positions that I filled, were all over --
24 were adults.

25 Q. When you say adults, over the age

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2 of 18?

3 A. I think we can establish what adult
4 would be.

5 Q. You never interviewed or I know you
6 don't want to use the word hired, whatever
7 your role was, you brought in an exercise
8 instructor that was under the age of 18 to
9 work at the house?

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

12 A. I have already testified that what
13 I was responsible for was to find people who
14 had competencies in whatever area I was
15 looking for. The competencies I was looking
16 for were professional and adult.

17 Q. So there was no exercise instructor
18 that worked at the Palm Beach house or the
19 New York house or the New Mexico house or the
20 USVI under the age of 18?

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

23 A. I can only testify to when I was at
24 the house.

25 Q. Yes.

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2 A. I can only testify to the years
3 when I was present.

4 Q. Right.

5 A. And I can also only testify to
6 people I personally either met and/or worked
7 with and/or invited, to find the correct
8 word, I don't know what the correct word is,
9 to come to do exercise or whatever it was at
10 the house.

11 Of the people that I, male and/or
12 female that I brought were all appropriate
13 and age appropriate adults.

14 Q. Over the age of 18?

15 A. We've established them as an adult.

16 Q. You are saying appropriate adults,
17 so we are clear, you didn't hire or bring in
18 or know of any exercise instructors that were
19 under the age of 18 at any of those homes?

20 A. I am also testifying that when I
21 was present at the house and with the people
22 that I brought in, were all age appropriate
23 adults.

24 Q. How do you define age appropriate
25 adults, is that over the age of 18, can we

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2 agree to that?

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

5 Q. Are they under the age of 18?

6 A. We already established that you can
7 be a masseuse in Florida at age 17. That
8 does not make it inappropriate.

9 A. I'm not saying appropriate or
10 inappropriate. I'm just asking if there were
11 any exercise instructors that were under the
12 age of 18.

13 A. I am not aware if anybody was but I
14 don't want to full out and say you oh she
15 said, we already established you can be a 17
16 year old masseuse and have it not be
17 something that is not appropriate. So when
18 you say that and then you go, well, you come
19 back and say something, now we can establish
20 that Virginia was 17 but you can be a 17 year
21 old legal masseuse, but I am not aware to
22 your point.

23 Q. Who were the other 17 year old
24 masseuses that you were aware of?

25 A. I am not aware of any.

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2 Q. Were there any 16 year year old
3 masseuse that you are aware of?

4 A. I am not aware.

5 Q. Any 15?

6 A. I just want to be clear. The only
7 person that I am aware of who claims to have
8 been a -- we have to -- we established
9 Virginia now is 17, given she has changed her
10 age so many times. The only person that I am
11 aware of that was a masseuse at the time when
12 I was present in the house was Virginia.

13 Q. Is it an obvious lie that Jeffrey
14 Epstein had a sexual preference for underage
15 minors?

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

18 A. Can you ask the question again?

19 Q. It is it an obvious lie that
20 Jeffrey Epstein had a sexual preference for
21 underage minors?

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

24 A. Can you ask the question again?

25 Q. Is it an obvious lie that Jeffrey

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2 Epstein had a sexual preference for underage
3 minors?

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

6 A. I cannot testify to what
7 Jeffrey's --

8 Q. You don't know his preference?

9 A. You handed me a stack of papers
10 from the police reports and that's what I've
11 read but I have no knowledge, direct
12 knowledge, of what you are referencing.

13 Q. So you don't know, you don't know
14 in your own mind that Jeffrey Epstein had a
15 sexual preference for underage minors, is
16 that correct?

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

19 Q. Is that correct?

20 A. Please ask the question again.

21 Q. You don't know in your own mind
22 that Jeffrey Epstein had a sexual preference
23 for underage minors?

24 MR. PAGLIUCA: Objection to the
25 form and foundation. You have to pause,

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2 let me object, answer the question.

3 Listen to her question, pause, I object,
4 you answer.

5 Q. So you don't know in your own mind
6 that Jeffrey Epstein had a sexual preference
7 for underage minors?

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

10 Q. You can answer.

11 A. I cannot tell you what Jeffrey's
12 story is. I'm not able to.

13 Q. Did Jeffrey Epstein have a scheme
14 to recruit underage girls to use them for
15 purposes of sexual massages?

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

18 A. Can you ask me again, please?

19 Q. Did Jeffrey Epstein have a scheme
20 to recruit underage girls to recruit them for
21 sexual massages?

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

24 A. Can you ask it a different way?

25 Q. Did Jeffrey Epstein have a scheme

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2 to recruit underage girls for sexual
3 messages?

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

6 Q. If you know.

7 A. I don't know what you are talking
8 about.

9 Q. Is it an obvious lie that Virginia
10 Giuffre was a minor the first time she was
11 taken to Jeffrey Epstein's house?

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

14 A. So we've already established that
15 Virginia was 17 and we have established that
16 her mother brought her to the house and that
17 she came as a masseuse, age 17, which is
18 legal in Florida.

19 Q. Would Jeffrey Epstein's assistants
20 arrange times for underage girls to come to
21 the house for sexual massages?

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

24 A. What are you talking about?

25 Q. Sure. Would Jeffrey Epstein's

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2 A. I know nothing about that
3 transaction.

4 Q. Can you list for me all the girls
5 that you have met and brought to Jeffrey
6 Epstein's house that were under the age of
7 18?

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

10 A. I could only recall my family
11 members that were there and I could not make
12 a list of anyone else because that list -- it
13 never happened that I can think of.

14 Q. I'm talking about the time you were
15 working for Jeffrey Epstein, can you list all
16 girls that you found for Jeffrey Epstein that
17 were under the age of 18 to come work for him
18 in any capacity?

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

21 A. I didn't find the girls.

22 Q. You choose the word.

23 MR. PAGLIUCA: If you have a
24 question ask it, you don't choose the
25 word.

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2 Q. List all of the girls you met and
3 brought to Jeffrey Epstein's home for the
4 purposes of employment that were under the
5 age of 18?

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

8 A. I've already characterized my job
9 was to find people, adults, professional
10 people to do the jobs I listed before; pool
11 person, secretary, house person, chef, pilot,
12 architect.

13 Q. I'm asking about individuals under
14 the age of 18, not adult persons, people
15 under the age of 18.

16 A. I looked for people or tried to
17 find people to fill professional jobs in
18 professional situations.

19 Q. So Virginia Roberts was under the
20 age of 18, correct?

21 A. I think we've established that
22 Virginia was 17.

23 Q. Is she the -- sorry, go ahead.

24 Is she the only individual that you
25 met for purposes of hiring someone for

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2 Jeffrey that was under the age of 18?

3 MR. PAGLIUCA: Objection to form
4 and foundation. Mischaracterizes her
5 testimony.

6 A. I didn't hire people.

7 Q. I said met.

8 A. I interviewed people for jobs for
9 professional things and I am not aware of
10 anyone aside from now Virginia who clearly
11 was a masseuse aged 17 but that's, at least
12 that's how far we know that I can think of
13 that fulfilled any professional capacity for
14 Jeffrey.

15 Q. List all the people under the age
16 of 18 that you interacted with at any of
17 Jeffrey's properties?

18 A. I'm not aware of anybody that I
19 interacted with, other than obviously
20 Virginia who was 17 at this point?

21 (Maxwell Exhibit 21, email, marked
22 for identification.)

23 Q. I'm showing you what's been marked
24 as Maxwell 21, it's an email dated January
25 21, 2015 from Jeffrey to you. Is that, you

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2 MS. McCAWLEY: I will state for the
3 record there were questions today that
4 remain unanswered because the witness
5 has been instructed not to answer those
6 questions and we will be raising our
7 objections with the court to be able to
8 have those questions answered in the
9 near future.

10 MR. PAGLIUCA: So we are clear, we
11 are designating this entire deposition
12 as confidential under the protective
13 order. That would cover the paralegal
14 whose been present as well as the court
15 reporter and the videographer and all
16 the lawyers in the room.

17 THE VIDEOGRAPHER: This concludes
18 today's proceedings. We are off the
19 record at 6:43 p.m.

20 (Time noted: 6:43 p.m.)

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