EXHIBIT A

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- x

CONFIDENTIAL

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 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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228 East 48th Street
New York, New York 10017
BY: ROBERT LEWIS, ESQ.

Also Present:

RODOLFO DURAN, Videographer

THE VIDEOGRAPHER: This is DVD No. 1 in the video-recorded deposition of Rinaldo Rizzo, in the matter of Virginia Giuffre versus Ghislaine Maxwell, in the United States District Court, Southern District of New York. This deposition is being held at 333 Main Street in Armonk, New York, June 10, 2016, at approximately 10:06 a.m.

My name is Rodolfo Duran. I am the legal video specialist. The court reporter is Leslie Fagin, and we're both in association with Magna Legal Services.

Will counsel please introduce themselves.

MR. EDWARDS: Brad Edwards. I represent the plaintiff, Virginia Giuffre.

MR. PAGLIUCA: Jeff Pagliuca, appearing on behalf of Ms. Maxwell.

MR. LEWIS: Robert Lewis, with the firm of Freeman Lewis, LLP, representing the deponent, Rinaldo Rizzo.

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THE VIDEOGRAPHER: Will the court reporter please swear in the witness.

RINALDO RIZZO,
called as a witness, having been duly sworn by a Notary Public, was examined and testified as follows:

EXAMINATION BY
MR. EDWARDS:

Q. Mr. Rizzo, can you tell us your full name for the record?
A. Rinaldo A. Rizzo.
Q. And what is your date of birth?
A. [redacted]
Q. What is your address?
A. [redacted].
Q. What is your educational background?
A. I have a management degree with a minor in business law from Texas A&M University, and I have a degree in applied science in hospitality and culinary arts from the Culinary Institute of America.

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Q. Are you married?
A. Yes.
Q. Who are you married to?
A. [redacted]
Q. How long have you been married?
A. We've been together 27 years, so 22.
Q. And do you have children?
A. Yes.
Q. How many?
A. One.
Q. Since graduating, what has been your profession?
A. It is called private service or domestic service.
Q. What does that mean?
A. My role is to work within a family as a desired position that's offered to me, and most of it's been in management or support of household staff.
Q. Was there a time when you worked in the household of Glenn Dubin and Eva Anderson Dubin?
A. Yes.

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fired abruptly at this point, right?
A. Correct.
Q. You went and retained counsel to sue the Dubins, their entity and [redacted], all of them, right?
A. Correct.
Q. I take it you were deposed in connection with that litigation, correct?
A. Correct.
Q. Now, during that litigation, that litigation meaning the reference in Exhibit 3, 13-cv-8864, did you ever tell anyone about the interactions with Mr. Epstein that you described here today?
A. No, I did not.
Q. That was not a part of your lawsuit, correct?
A. Could you restate the question? I don't understand what --
Q. You didn't raise that as an issue as to why you were suing the Dubins in 2013, right?
A. No, I did not.
THE VIDEOGRAPHER: The time is

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12:41. We are going off the record.
(Recess.)
THE VIDEOGRAPHER: The time is 12:47 p.m. We are back on the record. This begins DVD No. 3.
BY MR. PAGLIUCA:
Q. I just have a few more questions. I'm going to finish off with your employment.
So after this lawsuit was concluded, referenced in Exhibit 3, have you worked since then?
A. No, I have not.
Q. Has your wife worked since then?
A. On and off, yes.
Q. How is it that you are currently supporting yourself?
A. I'm on disability.
Q. That's as a result of your back injury?
A. Yes, and my hip injury.
Q. I didn't realize you had a hip injury, I'm sorry. Is that Social Security disability?
A. Yes, it is.

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Q. The lawsuit with the Dubins referenced in Exhibit 3 was settled, I take it?
A. Correct.
Q. That was pursuant to a confidential settlement agreement?
A. Correct.
Q. And I am assuming that you received a sum of money to settle that litigation, is that correct?
A. Correct.
Q. And I'm not going to ask you the details about that, but in case I need to do something, let me put it this way. If I choose to subpoena that settlement agreement from the Dubins, are you going to have any objection to that, or is it all right if we do that as far as you are concerned?
A. I would have to discuss it with my lawyer.
MR. PAGLIUCA: I can talk to you about that, if we decide to do it.
Q. I just want to turn now, and this is the last series of questions I have, what

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you did in advance of coming here today.
Have you talked to Mr. Edwards before?
A. Yes.
Q. And when have you talked to Mr. Edwards?
A. I don't recall the exact date and time.
Q. Did Mr. Edwards call you or did you call Mr. Edwards first?
A. I called him.
Q. When did you call Mr. Edwards?
A. I don't recall the exact date and time.
Q. Years ago, days ago, months ago?
A. It's been at least over a year.
Q. Why did you call Mr. Edwards?
A. At the time I was having a very hard time with my attorney. My wife and I had discussed the issue. As my wife put it, we needed an attorney with balls and she had been keeping track of the Jeffrey Epstein issue, and basically in our conversation --
MR. LEWIS: Let me stop you there.

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There is a privilege of spousal privilege, so please don't disclose conversations you had with your wife.
THE WITNESS: Sorry.
MR. LEWIS: You can answer the question why you called, but you don't need to disclose anything about conversations with your wife.
A. I was looking for an attorney that basically could handle this kind of situation, and I felt like, from what I had read, that Mr. Edwards was probably someone I needed to attain, if I could.
Q. And so the, you referenced dissatisfaction with an attorney. I'm assuming that was the attorney that filed this 13-cv-8664 action, is that correct?
A. Correct.
Q. So you weren't happy with that lawyer and you were looking for a more aggressive lawyer?
A. Correct, or someone that could work with my lawyer.
Q. The point being you were looking to

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recover some form of compensation, I take it, from the Dubins or Mr. Epstein?
A. I was hoping -- how does Mr. Epstein --
Q. I don't know. I'm asking the question.
A. That's incorrect.
Q. You were seeking to get compensation from the Dubins, though?
A. Correct.
Q. And that was the point of you calling Mr. Edwards is that, however you learned it, you learned about the Epstein litigation and you knew Mr. Edwards was involved in the Epstein litigation?
A. Correct.
Q. The point of you contacting Mr. Edwards was to see if he could represent you in some litigation involving the Dubins in which you would collect money, is that right?
A. Correct.
Q. And so when you called Mr. Edwards, what do you recall telling him?
MR. LEWIS: At this point, I object

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on attorney/client privilege grounds. The conversation is privileged for the purpose of seeking legal advice.
MR. PAGLIUCA: I don't understand. Mr. Edwards is the lawyer for the witness.
MR. LEWIS: I am the lawyer for the witness.
MR. PAGLIUCA: I know, I'm not asking about you.
MR. LEWIS: He called Mr. Edwards for the purpose to determine whether Mr. Edwards could represent him in some capacity in that other lawsuit, so the conversations is privileged.
MR. PAGLIUCA: I'm going to disagree, and you know we may need to revisit that issue respectfully.
MR. LEWIS: Fair enough.
MR. PAGLIUCA: Let me put some parameters on this that don't ask for communications.
MR. LEWIS: Ask a question and I will object or not.

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Q. I think you said you called Mr. Edwards about a year ago?
A. More or less, correct.
Q. I didn't print out the docket sheet, but do you recall when you settled the 13-cv-8664 case?
A. To the best of my recollection, I think it was in December.
Q. Of?
A. I don't recall. I mean, it's last year.
Q. Without telling me what you told Mr. Edwards, what was the purpose of your calling -- I think you already told me this, so I won't reask it. Never mind.
Did you just speak with Mr. Edwards over the phone?
A. Correct, yes.
Q. And I take it Mr. Edwards did not become your lawyer in connection with any litigation against the Dubins, correct?
MR. LEWIS: You may answer that.
A. Correct.
Q. And Mr. Edwards in some fashion

indicated to you that he wasn't going to be your lawyer in connection with litigation, correct?

MR. LEWIS: Objection. Do not answer that on privilege grounds.

Q. Mr. Edwards never became your lawyer, is that right?

A. Correct.

Q. After that conversation, did you have any -- after you understood that Mr. Edwards was not your lawyer, did you have further conversations with Mr. Edwards?

A. No, I did not.

Q. You may object to this, but I need to ask this question. In the first conversation that you had with Mr. Edwards, did you tell Mr. Edwards the things that you've told us here today?

MR. LEWIS: Objection. Do not answer.

MR. PAGLIUCA: Privilege?

MR. LEWIS: Yes.

MR. PAGLIUCA: So just so the record is clear, it seems to me this

would be a subject matter waiver of everything that he has talked about. I don't know why it makes a difference if he is talking about it now and he told Mr. Edwards, I think he can talk about what he said to Mr. Edwards. It seems to me there is a waiver here.

MR. LEWIS: You are presuming what he said to Mr. Edwards. And secondly, just because, even if that were the case, I'm not saying it is, just because you testify to incidents which you tell your attorney about doesn't mean the disclosures to your attorney are not privileged.

MR. PAGLIUCA: Fair enough. We can argue about this later if we need to.

BY MR. PAGLIUCA:

Q. Other than Mr. Edwards and your wife and your current attorney, have you talked to anyone else about the things that you've talked about here today?

A. No, I have not.

Q. I think you answered this question,

but I want to make sure.

After that first conversation with Mr. Edwards, did you speak with Mr. Edwards again in advance of this deposition today?

MR. LEWIS: You may answer that.

A. No, I have not.

Q. Do you know, did Mr. Edwards provide a list of questions to your lawyer, who is here today, for you to provide those answers to your lawyer to give to Mr. Edwards?

MR. LEWIS: I advise the witness to only answer that question to the extent he knows it outside of any conversations that he might have had with me, which are privileged.

A. No.

Q. So let me explain that question, and here is my issue with that, and I don't know if this happened or didn't happen, but if there are questions that are given proposed to you by Mr. Edwards and you give them to the client with the expectation he is going to give that information to you to give

to Mr. Edwards, it's not privileged.

MR. LEWIS: I can represent that didn't happen.

MR. PAGLIUCA: That solves the problem.

Q. I'm just closing the loop on this and then we are done.

Have you spoken to anyone who is affiliated with Mr. Edwards, either another lawyer in his office, paralegal, an investigator, about the things that you've talked about here today?

A. No, I have not.

MR. PAGLIUCA: That's all I have.

MR. EDWARDS: I don't have any questions. I appreciate you taking the time. Sorry about your injury.

THE VIDEOGRAPHER: The time is 12:58 p.m. and we are going off the record.

(Recess.)

THE VIDEOGRAPHER: Back on the record.

MR. PAGLIUCA: The parties have