

## **EXHIBIT D**

Confidential

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:  
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

\*\*CONFIDENTIAL\*\*

Continued Videotaped Deposition of  
GHISLAINE MAXWELL, the Defendant herein,  
taken pursuant to subpoena, was held at  
the law offices of Boies, Schiller &  
Flexner, LLP, 575 Lexington Avenue, New  
York, New York, commencing July 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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New York, New York 10026  
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 2 On Behalf of the Plaintiff:  
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 28 150 East 10th Avenue  
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 30 BY: JEFFREY S. PAGLIUCA, ESQUIRE  
 31 LAURA A. MENNIGER, ESQUIRE  
 32 Also Present:  
 33

1  
 2 MR. EDWARDS: Brad Edwards, also  
 3 representing the plaintiff, Virginia  
 4 Giuffre.  
 5 MR. POTTINGER: Stan Pottinger,  
 6 also representing the plaintiff.  
 7 MR. CASSELL: Paul Cassell, from  
 8 Salt Lake City, Utah, also representing  
 9 Ms. Giuffre.  
 10 MR. PAGLIUCA: Jeff Pagliuca and  
 11 Laura Menninger, on behalf of Ms.  
 12 Maxwell.  
 13 And Ms. McCawley has also entered  
 14 the room, and we have an assistant from  
 15 Boies Schiller from the Fort Lauderdale  
 16 office here today as well today.  
 17 THE VIDEOGRAPHER: Will the court  
 18 reporter please swear in the witness.  
 19 G H I S L A I N E M A X W E L L,  
 20 called as a witness, having been duly  
 21 sworn by a Notary Public, was  
 22 examined and testified as follows:  
 23 EXAMINATION BY  
 24 MR. BOIES:  
 25 Q. Good morning, Ms. Maxwell. [REDACTED]

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1  
 2 THE VIDEOGRAPHER: This is DVD No.  
 3 1, Volume II, of the continued video  
 4 recorded deposition of Ghislaine Maxwell  
 5 in the matter Virginia Giuffre against  
 6 Ghislaine Maxwell, in the United States  
 7 District Court, Southern District of New  
 8 York.  
 9 This deposition is being held at  
 10 575 Lexington Avenue, New York, New  
 11 York, on July 22, 2016 at approximately  
 12 9:04 a.m.  
 13 My name is Rodolfo Duran. I am the  
 14 legal video specialist. The court  
 15 reporter is Leslie Fagin, and we are  
 16 both in association with Magna Legal  
 17 Services.  
 18 Will counsel please introduce  
 19 themselves.  
 20 MR. BOIES: This is David Boies, of  
 21 Boies, Schiller & Flexner, counsel for  
 22 plaintiff.  
 23 MS. SCHULTZ: Meredith Schultz,  
 24 from Boies Schiller & Flexner, counsel  
 25 for plaintiff.

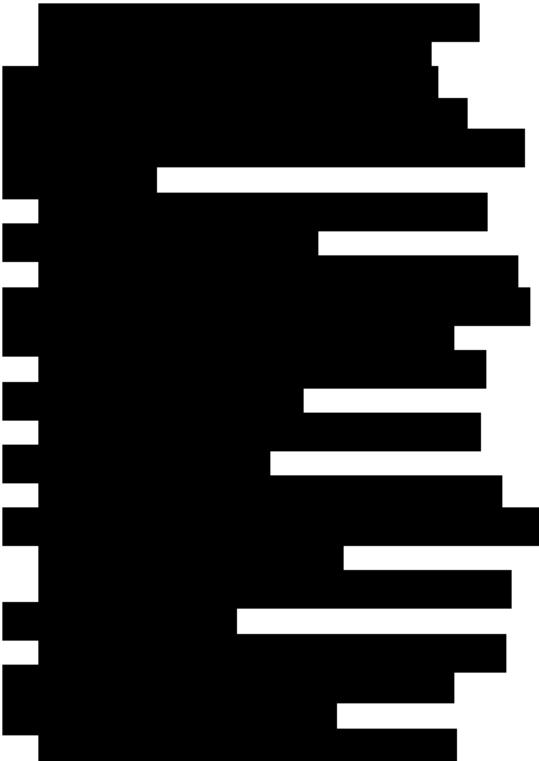
1 G. Maxwell - Confidential  
 2 [REDACTED]

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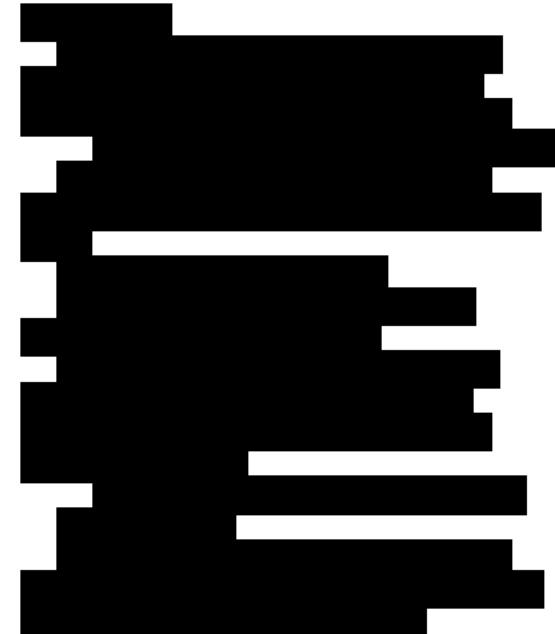
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1 G. Maxwell - Confidential  
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1 G. Maxwell - Confidential  
2



22  
23 MR. PAGLIUCA: Object to the form  
24 and foundation.  
25 MR. BOIES: Excuse me, counsel.  
MR. PAGLIUCA: I'm objecting to

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1 G. Maxwell - Confidential  
2  
3



1 G. Maxwell - Confidential  
2 form and foundation, and I have an  
3 opportunity to do that.  
4 MR. BOIES: Yes, you do, but you do  
5 not have an opportunity to disrupt the  
6 deposition.  
7 MR. PAGLIUCA: Which I'm not.  
8 MR. BOIES: The court will decide  
9 that, as the court has decided the  
10 issues before.  
11



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Page 12

1 G. Maxwell - Confidential  
2 [REDACTED]1 G. Maxwell - Confidential  
2 [REDACTED]

Page 11

Page 13

1 G. Maxwell - Confidential  
2 [REDACTED]1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]

6 Q. You understand that you are under  
7 oath, correct?  
8 A. I do.  
9 Q. And you understand that the oath  
10 requires you to tell the truth, the whole  
11 truth and nothing but the truth in response  
12 to questions?

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

15 Q. Do you?  
16 A. I do understand that.  
17 Q. Do you understand if you fail to do  
18 that, that you could be prosecuted for  
19 perjury?

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

22 A. I understood that is what happens  
23 at these events.

24 Q. And do you understand that if you  
25 say that you do not recall and in fact you do

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<p>1 G. Maxwell - Confidential  2 recall, that would violate your oath?  3 MR. PAGLIUCA: Object to the form  4 and foundation.  5 A. If I don't recall, I don't recall.  6 It's not a question of whether I'm violating  7 my oath or not. I don't know.</p>	<p>1 G. Maxwell - Confidential  2 [REDACTED]  23 Q. Were you ever on a plane with  24 Mr. Epstein when Mr. Epstein had sex with  25 anyone?</p>
<p>1 G. Maxwell - Confidential  2 [REDACTED]  23 Q. Were you ever on a plane with  24 Mr. Epstein when, to your knowledge,  25 Mr. Epstein had sex with anyone?  26 A. Can you repeat the question?  27 Q. Were you ever on a plane with  28 Mr. Epstein when, to your knowledge,  29 Mr. Epstein had sex with anyone?  30 A. Not that I can recall.  31 Q. Were you ever on a plane with  32 Mr. Epstein when you saw Mr. Epstein having  33 sex with anyone?  34 A. Never.  35 Q. I want to be sure that the question  36 and answer is meeting. When you refer to  37 having sex with someone, what are you  38 referring to?</p>	<p>1 G. Maxwell - Confidential  2 MR. PAGLIUCA: Object to the form  3 and foundation.  4 A. Intercourse.  5 Q. And when you refer to intercourse,  6 what do you refer to?</p>

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1 G. Maxwell - Confidential  
 2 A. I think everyone here can  
 3 understand what intercourse is, is when you  
 4 have sex. I don't know how to say  
 5 intercourse any other way, having sex with  
 6 somebody. Perhaps you would like to define  
 7 it for me.

8 Q. I'm trying to get your definition  
 9 right now because you are the witness. When  
 10 you use the term intercourse, what are you  
 11 referring to?

12 A. I'm referring to a penis entering  
 13 someone's vagina.

1 G. Maxwell - Confidential  
 2 [REDACTED]

11 MR. PAGLIUCA: I'm going to  
 12 instruct you not to answer, unless you  
 13 tie it to a specific individual related  
 14 to this case per the court's order.

15 MR. BOIES: I think the court's  
 16 order specifically permits this question  
 17 with respect to occasions related to  
 18 this case. If you instruct her not to  
 19 answer, all you're going to do is bring  
 20 her back. That's up to you.

21 MR. PAGLIUCA: It's up to you as  
 22 the questioner, Mr. Boies.

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Page 21

1 G. Maxwell - Confidential  
 2 [REDACTED]

1 G. Maxwell - Confidential  
 2 [REDACTED]

6 You haven't tied your question to  
 7 time or individual or specific location.  
 8 And so unless you do that, we have an  
 9 open-ended question that would span from  
 10 the early '90s to 2000 or so, which  
 11 would not be tied to the key events,  
 12 individuals or locations of this case.

13 BY MR. BOIES:

14 Q. Let me ask you a couple more  
 15 questions. Then I think we probably ought to  
 16 call the court and get some guidance on this.

24 Q. Were you ever on Mr. Epstein's  
 25 plane when, to your knowledge, Mr. Epstein

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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Object to the form</p> <p>3 and foundation.</p> <p>4 A. I don't even know who they are, so</p> <p>5 I wouldn't -- I have no clue who they are, I</p> <p>6 don't know where they are, I don't know where</p> <p>7 they come from, I don't recognize -- I only</p> <p>8 pointed out [REDACTED] because I recognize</p> <p>9 the name from various documents I read. I</p> <p>10 don't have any knowledge of any other person</p> <p>11 on this list. I don't believe I've ever even</p> <p>12 seen these names. I don't know who they are</p> <p>13 at all.</p> <p>14 I would not be able to identify a</p> <p>15 single name on this list other than those</p> <p>16 three that I have indicated to you.</p> <p>17 [REDACTED]</p>	<p>1 G. Maxwell - Confidential</p> <p>2 a massage at his home in New York, regardless</p> <p>3 of where in the home it was?</p> <p>4 A. No.</p> <p>5 Q. Have you ever seen anyone give</p> <p>6 Mr. Epstein a massage at his home in Palm</p> <p>7 Beach?</p> <p>8 A. I have.</p> <p>9 Q. Have you ever seen anyone give</p> <p>10 Mr. Epstein a massage in New Mexico?</p> <p>11 A. No, I can't recall.</p> <p>12 Q. Have you ever seen anyone give</p> <p>13 Mr. Epstein a massage in the Virgin Islands?</p> <p>14 A. I have.</p> <p>15 Q. Have you ever seen anyone give</p> <p>16 Mr. Epstein a massage in Paris?</p> <p>17 A. No, I don't recall seeing that.</p> <p>18 Q. Have you ever seen anyone give</p> <p>19 Mr. Epstein a massage on an airplane?</p> <p>20 A. No.</p> <p>21 Q. Have you ever seen anyone give</p> <p>22 Mr. Epstein a massage anywhere other than his</p> <p>23 home in Palm Beach or in the Virgin Islands?</p> <p>24 A. I'm sorry, can you just repeat the</p> <p>25 question?</p>
<p>1 G. Maxwell - Confidential</p> <p>2 [REDACTED]</p> <p>5 Q. Did you provide massages to</p> <p>6 Mr. Epstein?</p> <p>7 A. No.</p> <p>8 Q. What?</p> <p>9 A. No.</p> <p>10 Q. Were you ever present when anyone</p> <p>11 provided a massage to Mr. Epstein?</p> <p>12 MR. PAGLIUCA: Object to the form</p> <p>13 and foundation.</p> <p>14 A. I have seen people give Mr. Epstein</p> <p>15 massages. I have seen him on a massage</p> <p>16 table. I have seen that.</p> <p>17 Q. Have you seen someone other than</p> <p>18 yourself give Mr. Epstein a massage at his</p> <p>19 home in New York?</p> <p>20 A. I can't recall seeing him in the</p> <p>21 massage room in New York, no.</p> <p>22 Q. I'm not asking whether you recall</p> <p>23 seeing him in the massage room in New York.</p> <p>24 I'm asking you whether you have ever seen</p> <p>25 someone other than yourself give Mr. Epstein</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. Have you ever seen anyone give</p> <p>3 Mr. Epstein a massage anywhere other than in</p> <p>4 his home in Palm Beach or in the Virgin</p> <p>5 Islands?</p> <p>6 A. No, I can't think of anyplace.</p> <p>7 Q. Have you ever seen anyone give</p> <p>8 Mr. Epstein a massage when Mr. Epstein was</p> <p>9 not clothed?</p> <p>10 A. Sorry, can you repeat the question?</p> <p>11 Q. Have you ever seen anyone give</p> <p>12 Mr. Epstein a massage when Mr. Epstein was</p> <p>13 not clothed?</p> <p>14 A. I think when Mr. Epstein received</p> <p>15 massages, he never had clothes on.</p> <p>16 Q. Who did you see give Mr. Epstein a</p> <p>17 massage?</p> <p>18 A. I can't recall the "whos" because I</p> <p>19 don't really remember, but I have seen him</p> <p>20 receive massages from professional adult</p> <p>21 masseuses that I have seen him receive</p> <p>22 massages.</p> <p>23 Q. When you say professional adult</p> <p>24 masseuses, what are you referring to?</p> <p>25 A. I just want to be sure that we</p>

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<p>Page 30</p> <p>1 G. Maxwell - Confidential  2 understand that the times I have seen him  3 receive a massage it's been by somebody who  4 is an adult, clearly an older person. I  5 don't know if they're professional, but an  6 older person appearing to be a professional  7 masseuse.</p> <p>8 Q. What led you to believe that the  9 person giving the massage was a professional  10 masseuse?</p> <p>11 A. Because the massages that I  12 witnessed looked professional. I don't know  13 how to -- I'm defining it as opposed to the  14 ones from where people ask me inappropriate  15 questions, I couldn't answer, but these are  16 people who would be clothed giving a  17 professional massage, it appeared to be a  18 professional massage, as opposed to any other  19 type of massage.</p> <p>20 Q. Have you ever had what you refer to  21 as a professional massage?</p> <p>22 A. I have.</p> <p>23 Q. Have you ever had what you refer to  24 as a professional massage in any of Mr.  25 Epstein's homes?</p>	<p>Page 32</p> <p>1 G. Maxwell - Confidential  2 as professional massages, you were clothed or  3 unclothed?</p> <p>4 A. Unclothed.</p> <p>5 Q. Completely unclothed?</p> <p>6 A. Typically when you receive a  7 massage you are not clothed, so I was  8 unclothed, as is the norm in a massage  9 situation.</p> <p>10 Q. That is, you didn't have any  11 clothes on, is that the case?</p> <p>12 A. Generally, what happens is you are  13 not wearing any clothes and you have a towel  14 or sheet that covers you while you are  15 receiving the massage, so I would be covered  16 always, but underneath the sheet or towel, I  17 would not be wearing any clothing.</p> <p>18 Q. Are you saying that the massage was  19 through the sheet?</p> <p>20 A. Well, in some instances, yes.</p> <p>21 Q. It is your testimony that when you  22 received what you referred to as professional  23 massages, the masseuse didn't touch your  24 skin, only touched the sheet?</p> <p>25 MR. PAGLIUCA: Object to the form</p>
<p>Page 31</p> <p>1 G. Maxwell - Confidential  2 A. I have.</p> <p>3 Q. Did you ever have what you refer to  4 as a professional massage in Mr. Epstein's  5 home in New York?</p> <p>6 A. I don't recall, but I think I have,  7 but I don't recall. I must have, but I don't  8 recall.</p> <p>9 Q. Did you ever have what you refer to  10 as a professional massage in Mr. Epstein's  11 home in Palm Beach?</p> <p>12 A. I did.</p> <p>13 Q. Did you ever have what you refer to  14 as a professional massage in Mr. Epstein's  15 home in New Mexico?</p> <p>16 A. I did.</p> <p>17 Q. Did you ever have what you refer to  18 as a professional massage in Mr. Epstein's  19 home in Paris?</p> <p>20 A. I did.</p> <p>21 Q. Did you ever have what you refer to  22 as a professional massage in the Virgin  23 Islands?</p> <p>24 A. I did.</p> <p>25 Q. When you had what you referred to</p>	<p>Page 33</p> <p>1 G. Maxwell - Confidential  2 and foundation.</p> <p>3 A. I didn't say that. I said in some  4 instances, some massages are where you don't  5 touch the skin, so I have received massages  6 where I don't get touched, especially if it's  7 just pressure, so it's through a sheet, but I  8 have also received massages where you are  9 touched and the sheet is just there for  10 modesty.</p> <p>11 Q. Have you ever received what you  12 referred to as a professional massage when  13 anyone else was in the room other than the  14 person that you are referring to as a  15 professional masseuse?</p> <p>16 MR. PAGLIUCA: Object to the form  17 and foundation.</p> <p>18 A. Can you repeat the question,  19 please?</p> <p>20 Q. Have you ever received a massage  21 when anyone was in the room other than the  22 person that you refer to as a professional  23 masseuse?</p> <p>24 MR. PAGLIUCA: Same objection.  25 A. I am entirely possible that in the</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 course of receiving a massage someone would</p> <p>3 come in and sit and chat to me while I was</p> <p>4 getting a massage, a friend would come in.</p> <p>5 That has happened.</p> <p>6 Q. Do you recall that happening?</p> <p>7 A. Not with specificity, I can't think</p> <p>8 of it actually, but I know that I've had</p> <p>9 friends come in and we've talked and as I got</p> <p>10 a massage, that has happened.</p> <p>11 Q. Have you ever received a massage</p> <p>12 when Mr. Epstein was present?</p> <p>13 A. He has entered the room and gave me</p> <p>14 a message or asked me a question, that has</p> <p>15 happened.</p> <p>16 Q. Have you ever received a massage</p> <p>17 when Mr. Epstein was in the room other than</p> <p>18 just to come in to give you a message or ask</p> <p>19 you a question?</p> <p>20 MR. PAGLIUCA: Object to the form</p> <p>21 and foundation.</p> <p>22 A. Not that I recall.</p> <p>23 Q. Did you ever participate in</p> <p>24 arranging for anyone to give Mr. Epstein a</p> <p>25 massage?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 home to give him a massage, other than</p> <p>3 someone who had previously given you a</p> <p>4 massage?</p> <p>5 A. No, I don't think so. No, I don't</p> <p>6 think so.</p> <p>7 Q. Is it your testimony that everyone</p> <p>8 that you arranged to come to Mr. Epstein's</p> <p>9 home to give Mr. Epstein a massage was</p> <p>10 somebody you had already had a massage from?</p> <p>11 A. No, that is not my testimony. I</p> <p>12 don't recall -- there were definitely</p> <p>13 instances where I had a massage and -- so</p> <p>14 what you are asking me was if anyone came to</p> <p>15 the house to give him a massage that I had</p> <p>16 not had a massage from myself?</p> <p>17 Q. It's a little different than that.</p> <p>18 A. Okay.</p> <p>19 Q. You've testified that you arranged</p> <p>20 for some people to come to Mr. Epstein's home</p> <p>21 to give him a massage, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And at one point, I thought you had</p> <p>24 testified that before you arranged to have</p> <p>25 people come to give Mr. Epstein a massage,</p>
<p>1 G. Maxwell - Confidential</p> <p>2 A. Part of my duties and my job -- can</p> <p>3 you repeat the question so I understand, and</p> <p>4 I give you the right answer exactly.</p> <p>5 Q. Did you ever participate in</p> <p>6 arranging for anyone to give Mr. Epstein a</p> <p>7 massage?</p> <p>8 A. Part of my professional</p> <p>9 responsibilities, I did, and I've testified</p> <p>10 previously, go to spas and other professional</p> <p>11 areas and received massages from people in</p> <p>12 these places, and if I felt that person was</p> <p>13 good or I had had a good massage, I had asked</p> <p>14 if they do home visits.</p> <p>15 In that capacity, I had, people did</p> <p>16 come to the house in that capacity, that I</p> <p>17 thought were good.</p> <p>18 Q. Did you ever arrange for anyone to</p> <p>19 give Mr. Epstein a massage or to come to his</p> <p>20 home to give him a massage, other than</p> <p>21 someone who had previously given you a</p> <p>22 massage?</p> <p>23 A. Sorry, can you repeat the question?</p> <p>24 Q. Did you ever arrange for anyone to</p> <p>25 give Mr. Epstein a massage or to come to his</p>	<p>1 G. Maxwell - Confidential</p> <p>2 you had -- you didn't use the word tested</p> <p>3 them out, but that you had previously gotten</p> <p>4 them to give you a massage so that you could</p> <p>5 see how good they were, is that fair to say?</p> <p>6 A. If I thought they were -- if I</p> <p>7 thought it was a good massage, yes, that is</p> <p>8 my testimony.</p> <p>9 Q. What I had thought, and what I'm</p> <p>10 now asking you is that everyone who you</p> <p>11 arranged to come to Mr. Epstein's home to</p> <p>12 give him a massage was somebody who you had</p> <p>13 already had a massage from, is that fair?</p> <p>14 A. Typically, yes, but that wasn't</p> <p>15 exclusively. So I know that friends of mine,</p> <p>16 for instance, would have a masseuse or</p> <p>17 masseur that they thought was very good, and</p> <p>18 they said this is a very good person.</p> <p>19 So it is possible, and I'm pretty</p> <p>20 sure sometimes on recommendations of other</p> <p>21 people, that without me having a massage from</p> <p>22 them, that they may have come to the house.</p> <p>23 So I could not testify that every single</p> <p>24 person that came to the house I received a</p> <p>25 massage from, because that would not be true.</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. Was every person who you arranged</p> <p>3 to come to Mr. Epstein's house to give a</p> <p>4 massage someone who either you had already</p> <p>5 had a massage from or you had a friend who</p> <p>6 recommended them as a good professional</p> <p>7 masseuse?</p> <p>8 MR. PAGLIUCA: Object to the form</p> <p>9 and foundation.</p> <p>10 A. Typically, that is how that would</p> <p>11 work.</p> <p>12 Q. Was there ever anyone who you</p> <p>13 arranged to come to Mr. Epstein's house to</p> <p>14 give him a massage, someone who you had not</p> <p>15 previously gotten a massage from yourself or</p> <p>16 received a recommendation from one of your</p> <p>17 friends that it was a good professional</p> <p>18 masseuse?</p> <p>19 MR. PAGLIUCA: Object to the form</p> <p>20 and foundation.</p> <p>21 A. I cannot think of anyone that would</p> <p>22 fit that category.</p> <p>23 Q. You made a point in a previous</p> <p>24 answer of referring to people as adult</p> <p>25 masseuses. Do you recall that?</p>	<p>Page 38</p> <p>1 G. Maxwell - Confidential</p> <p>2 A. I know what the allegations are,</p> <p>3 and I am aware of those, but as to my actual</p> <p>4 knowledge of somebody under the age of 21, I</p> <p>5 can't say that I know, I can't think of</p> <p>6 anybody. I know Virginia has obviously made</p> <p>7 those claims and she was 17 when he met her,</p> <p>8 but other than her, I cannot think of</p> <p>9 anybody.</p> <p>10 Q. Insofar as you are aware, did</p> <p>11 Virginia ever give Mr. Epstein a massage?</p> <p>12 A. I know she said she did and I</p> <p>13 believe she may have, but I don't ever see</p> <p>14 her giving him a massage, so I can't say.</p> <p>15 Q. Leaving aside any information that</p> <p>16 you have that has come from Virginia in the</p> <p>17 last decade?</p> <p>18 A. Right.</p> <p>19 Q. Going back to the time when</p> <p>20 Virginia was less than 21, at that period of</p> <p>21 time, did you believe that Virginia was</p> <p>22 giving Mr. Epstein massages?</p> <p>23 A. I do think she was giving him</p> <p>24 massages.</p> <p>25 Q. Is it your testimony that the only</p>
<p>Page 39</p> <p>1 G. Maxwell - Confidential</p> <p>2 A. I do.</p> <p>3 Q. When you refer to someone as an</p> <p>4 adult masseuse, what are you referring to?</p> <p>5 A. I think everybody in this room is</p> <p>6 an adult.</p> <p>7 Q. I don't necessarily disagree with</p> <p>8 that, but what I'm asking you, since I can't</p> <p>9 carry all these people with me every time</p> <p>10 somebody reads this transcript, is what do</p> <p>11 you mean by an adult?</p> <p>12 A. Well, I think an adult is somebody</p> <p>13 who looks older and professional and is</p> <p>14 someone who has lived some life and looks</p> <p>15 like any one of us in this room do, some a</p> <p>16 little older and some a little younger.</p> <p>17 Q. You are aware that there are</p> <p>18 assertions that Mr. Epstein had massages from</p> <p>19 females under the age of 21?</p> <p>20 A. I am aware of that.</p> <p>21 Q. Insofar as you are aware, did</p> <p>22 Mr. Epstein ever have a massage from anyone</p> <p>23 under the age of 21?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation.</p>	<p>Page 41</p> <p>1 G. Maxwell - Confidential</p> <p>2 female that you had any reason to believe was</p> <p>3 under 21 who was giving Mr. Epstein massages</p> <p>4 was Virginia?</p> <p>5 MR. PAGLIUCA: Object to the form</p> <p>6 and foundation.</p> <p>7 A. First of all, I didn't know how old</p> <p>8 Virginia was, so other than Virginia, so I</p> <p>9 can't say, but other than -- I was not aware</p> <p>10 of anybody else, no.</p> <p>11 Q. You first met Virginia when?</p> <p>12 A. I don't know.</p> <p>13 Q. Approximately?</p> <p>14 A. I believe it was in 2000, but now</p> <p>15 I'm going off the knowledge that I have, not</p> <p>16 from memory, so I met her the end of 2000</p> <p>17 apparently.</p> <p>18 Q. And when you met Virginia in 2000,</p> <p>19 how old did you think she was?</p> <p>20 MR. PAGLIUCA: Object to the form</p> <p>21 and foundation.</p> <p>22 A. I didn't think about how old she</p> <p>23 was. I don't recall the actual meeting of</p> <p>24 Virginia, so I can't say, but I think she was</p> <p>25 at least, I thought she was a professional</p>

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<p>1        G. Maxwell - Confidential</p> <p>2        masseuse as far as I can recall today, so</p> <p>3        that would have made her, I thought that</p> <p>4        would have made her, to work in a spa, I</p> <p>5        didn't think about, and I, I thought she</p> <p>6        appeared to be a professional masseuse.</p> <p>7        Q. Remember questions a while ago</p> <p>8        where you made a big point about people being</p> <p>9        adult masseuses?</p> <p>10       A. Right, yeah.</p> <p>11       Q. When you met Virginia for the first</p> <p>12       time --</p> <p>13       A. Right.</p> <p>14       Q. -- did you think she was an adult</p> <p>15       masseuse, as you use that term?</p> <p>16       A. I don't recall actually meeting</p> <p>17       Virginia at the time, and in fact, were it</p> <p>18       not for this case, I'm not sure I would</p> <p>19       recall her at all.</p> <p>20       Q. But you do recall knowing Virginia?</p> <p>21       A. I do, yes.</p> <p>22       Q. You do recall knowing that Virginia</p> <p>23       was giving Mr. Epstein massages, correct?</p> <p>24       MR. PAGLIUCA: Object to the form</p> <p>25       and foundation.</p>	<p>1        G. Maxwell - Confidential</p> <p>2        thought. I really don't recall her, so it's</p> <p>3        hard for me to testify what I thought about</p> <p>4        her age at the time.</p> <p>5        Q. Was Virginia, in the period of</p> <p>6        around 2000, the youngest person that, as you</p> <p>7        understood it, was giving Mr. Epstein</p> <p>8        massages?</p> <p>9        MR. PAGLIUCA: Object to the form</p> <p>10       and foundation.</p> <p>11       A. Again, I can't testify to her age,</p> <p>12       but everybody else that I can recall seemed</p> <p>13       to be again, like I would say, adults.</p> <p>14       Q. You didn't think Virginia was an</p> <p>15       adult, did you?</p> <p>16       MR. PAGLIUCA: Object to the form</p> <p>17       and foundation.</p> <p>18       A. Like I said, I don't recall her. I</p> <p>19       don't recall thinking about -- my memory is</p> <p>20       of adults giving Jeffrey massages, and as I</p> <p>21       don't really remember Virginia around that</p> <p>22       time, I don't know what I think.</p> <p>23       Q. You do remember Virginia, about</p> <p>24       that time back in the 2000s, giving</p> <p>25       Mr. Epstein massages?</p>
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<p>1        G. Maxwell - Confidential</p> <p>2        A. I believe she was, but I can't say</p> <p>3        for sure.</p> <p>4        Q. Why do you believe Virginia was</p> <p>5        giving Mr. Epstein massages?</p> <p>6        A. Today, because -- but back then.</p> <p>7        Q. Back then?</p> <p>8        A. Because at some point she would</p> <p>9        have been going to the massage room to give</p> <p>10       massages.</p> <p>11       Q. Back then, in the period around</p> <p>12       2000?</p> <p>13       A. Right.</p> <p>14       Q. You believed that Virginia was</p> <p>15       giving Mr. Epstein massages, correct?</p> <p>16       A. I believe I did, yes.</p> <p>17       Q. At the time back in the period</p> <p>18       around 2000 that you believe that Virginia</p> <p>19       was giving Mr. Epstein massages, how old did</p> <p>20       you think Virginia was at the time?</p> <p>21       MR. PAGLIUCA: Object to the form</p> <p>22       and foundation.</p> <p>23       A. I don't believe that I -- I don't</p> <p>24       know what I thought at the time. It's a long</p> <p>25       time ago and I just have no idea what I</p>	<p>1        G. Maxwell - Confidential</p> <p>2        MR. PAGLIUCA: Object to the form</p> <p>3        and foundation.</p> <p>4        A. I barely remember her at all.</p> <p>5        Q. Whether you barely remember her or</p> <p>6        not, you do remember that back in the period</p> <p>7        around 2000, Virginia was giving Mr. Epstein</p> <p>8        massages, right?</p> <p>9        MR. PAGLIUCA: Objection to form</p> <p>10       and foundation.</p> <p>11       A. Only in the most general terms. It</p> <p>12       would be somebody who would give him a</p> <p>13       massage, and that's it.</p> <p>14       Q. During the period of time back in</p> <p>15       the period around 2000, when you knew that</p> <p>16       Virginia was somebody who would give</p> <p>17       Mr. Epstein a massage, was she somebody who</p> <p>18       you considered an adult?</p> <p>19       MR. PAGLIUCA: Objection to form</p> <p>20       and foundation.</p> <p>21       A. I didn't consider her at all</p> <p>22       because she is not somebody that I really</p> <p>23       interacted with.</p> <p>24       Q. It is your testimony that Virginia</p> <p>25       was not somebody that you interacted with, is</p>

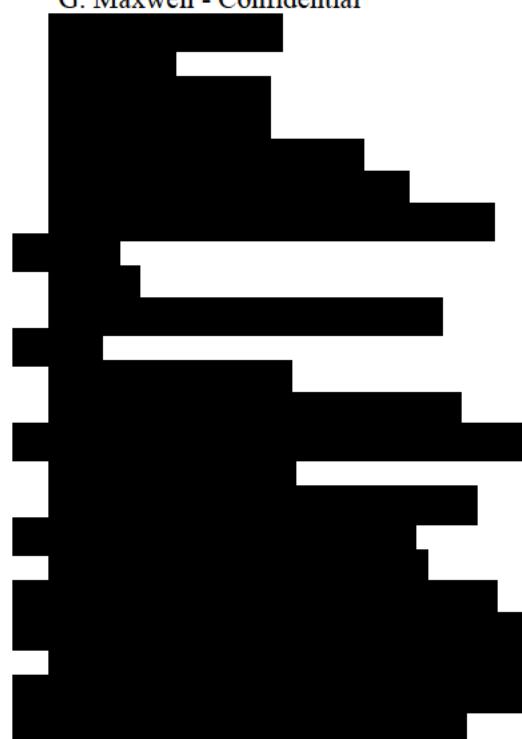
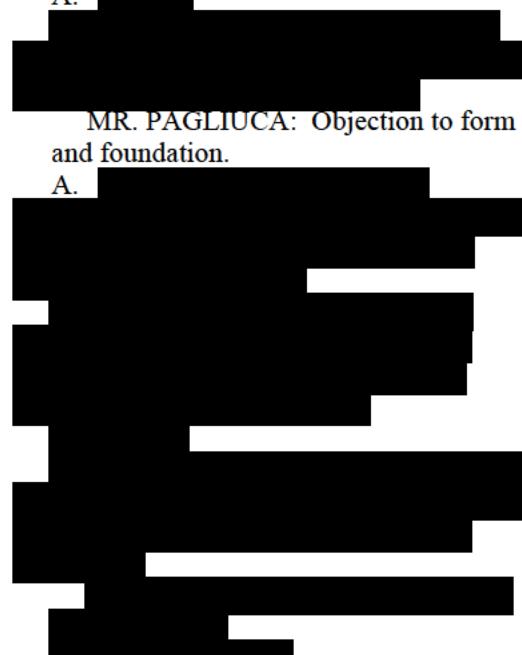
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<p>1 G. Maxwell - Confidential  2 that what you're saying?  3 A. I said I didn't really interact --  4 it's not that I didn't interact with her at  5 all, but not enough for her to make a very  6 strong and lasting impression.  7 Q. Is it your testimony that you  8 interacted with Virginia, but you didn't  9 really interact with Virginia?  10 MR. PAGLIUCA: Objection to form  11 and foundation.  12 A. I don't understand what that  13 actually even means.  14 Q. You said that you interacted with  15 Virginia. Do you recall that?  16 A. In the most general terms, I do  17 recall her.  18 Q. And then you testified that you  19 didn't really interact with Virginia. Do you  20 recall saying that?  21 A. I consider this a real interaction.  22 I will not be forgetting this any time soon.  23 But the most casual of relationships, where  24 you say hello or to be nice or polite, or  25 offer someone a glass of water or something</p>	<p>1 G. Maxwell - Confidential  2 MR. PAGLIUCA: We've been going for  3 about an hour this morning. I think  4 you're probably aware that Ms. Maxwell  5 was deposed for a full seven hours on a  6 prior occasion. In my view, the court's  7 order is limited and we shouldn't be  8 covering ground that we covered in the  9 prior deposition.  10 At some point, we are going to need  11 to call the court, if we go at this  12 pace, for instruction about length of  13 time here, because my view is that this  14 is not supposed to be a seven-hour  15 deposition, you are not supposed to be  16 covering old ground, and you should be  17 asking questions related to the, what I  18 characterize as the eight discreet areas  19 related to a, quote, sexual activity  20 which precedes all of the eight items in  21 the court's order of July 10th.  22 We spent a lot of time not talking  23 about those issues, and I suggest we get  24 to it or we get the court on the phone  25 for some guidance about timing here.</p>
<p>1 G. Maxwell - Confidential  2 is what I would term a casual interaction.  3 It is not something that, from what are we  4 talking, 17, 18 years ago, something that  5 really sticks out in my mind.  6 Q. Is it your testimony that your only  7 relationship with Virginia was what you  8 referred to as a casual relationship where  9 you might say hello or offer a glass of water  10 to be polite?  11 MR. PAGLIUCA: Objection to form  12 and foundation.  13 A. Generally, yes, that's how I would  14 characterize.  15 MR. PAGLIUCA: We've been going for  16 about an hour. I would like to take a  17 break.  18 MR. BOIES: Certainly.  19 THE VIDEOGRAPHER: The time is  20 10:01 a.m., and we are going off the  21 record.  22 (Recess.)  23 THE VIDEOGRAPHER: The time is  24 10:10 a.m., and we are back on the  25 record. This also begins DVD No. 2.</p>	<p>1 G. Maxwell - Confidential  2 MR. BOIES: I'm happy to get the  3 court on the phone any time you like. I  4 think the questions clearly relate to  5 sexual activity.  6 MR. PAGLIUCA: How old Virginia  7 Roberts was or not does not relate to  8 sexual activity. Her memory of how old  9 Virginia Roberts may or may not have  10 been does not relate to sexual activity,  11 and it was all asked and answered in the  12 prior deposition.  13 MR. BOIES: Your witness introduced  14 the subject, asserting that all of these  15 people were adults. I didn't ask  16 whether they were adults at that time.  17 I simply asked a general question that  18 was expressly covered by the judge's  19 order. Your client opened the door,  20 volunteered this and made it necessary  21 to do this.  22 I am happy to go to the court any  23 time you want, and I'm happy to go over  24 with the court some of these questions  25 and put it in context for the court with</p>

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1 G. Maxwell - Confidential 2 respect to what the documentary evidence 3 is. I'm happy to do that any time you 4 want. 5 MR. PAGLIUCA: Let's get on with it 6 and ask some questions that are relevant 7 to what the court ordered here. 8 MR. BOIES: I am asking questions 9 that I think are clearly relevant. If 10 you don't think so, I invite you to take 11 it to the court. If not, then let me 12 get on with my questions. Any time that 13 I get to a point where you think you 14 want to stop the deposition and go to 15 the court, I am more than prepared to do 16 that. 17 BY MR. BOIES: 18 Q. Ms. Maxwell, during the break, did 19 you have conversations with anyone? 20 A. My lawyers. 21 Q. What did your lawyers say to you? 22 MR. PAGLIUCA: Don't answer that 23 question. 24 Q. What did you say to your lawyer? 25 MR. PAGLIUCA: Don't answer that	1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Don't answer that 3 question. 4 Q. Did you have conversations with anyone other than your lawyer during the 5 break? 6 A. No. 7 Q. Did your lawyer tell you why he had 8 taken a break? 9 MR. PAGLIUCA: Don't answer that 10 question. 11 I don't think I did, by the way. 12 MR. BOIES: I'm happy to depose you 13 about it, if you want. 14 MR. PAGLIUCA: Sure. 15 MR. BOIES: I'm serious about that. 16 I'm happy to put you under oath right 17 now, and if you want to start talking 18 about what you did or did not do, I'm 19 happy to interrupt this deposition, put 20 you under oath and let you testify. 21 MR. PAGLIUCA: Ask a question. 22 MR. BOIES: I'm telling you. 23 Otherwise, I suggest you stop making 24 speeches. 25
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1 G. Maxwell - Confidential 2 question. 3 Q. Did you ask your lawyer for any 4 legal advice? 5 MR. PAGLIUCA: Don't answer that 6 question. 7 Q. Did your lawyer give you any legal 8 advice? 9 MR. PAGLIUCA: Don't answer that 10 question. 11 MR. BOIES: These are all yes or no 12 questions. 13 MR. PAGLIUCA: She is not answering 14 any of those questions, Mr. Boies. 15 Q. Did your lawyer give you advice as 16 to how to answer the questions I was asking? 17 MR. PAGLIUCA: Don't answer that 18 question. 19 Q. Did your lawyer tell you that you 20 were creating problems for yourself with some 21 of your answers? 22 MR. PAGLIUCA: Don't answer that 23 question. 24 Q. Did your lawyer suggest how you 25 might answer some of my questions?	1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Why don't we both 3 stop making speeches. 4 BY MR. BOIES: 5 

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1 2	G. Maxwell - Confidential 	G. Maxwell - Confidential 
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1 2 3 4 5	G. Maxwell - Confidential Epstein's home in Palm Beach? MR. PAGLIUCA: Objection to form and foundation. 	1 2 3 4 8 9 10 G. Maxwell - Confidential MR. PAGLIUCA: Objection to form and foundation. A. 

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1 2	G. Maxwell - Confidential  [REDACTED]	1 G. Maxwell - Confidential 2 Q. You were aware of how many people 3 gave Mr. Epstein massages? 4 MR. PAGLIUCA: Objection to form 5 and foundation. 6 A. I was not with him actually very 7 often. I was frequently -- we were 8 frequently not together, so I couldn't know 9 what he would be doing when I wasn't with 10 him. 11 But when we were together, the 12 behavior as described as alleged did not 13 happen, so he would have one massage a day, 14 that would be it. 15 Q. So insofar as you were aware and 16 when you were with Mr. Epstein, he only had 17 one massage a day? 18 A. Yeah. 19 Q. Other than Virginia Roberts, as you 20 understood it at the time, were any of the 21 people that gave Mr. Epstein massages women 22 who were under 21? 23 MR. PAGLIUCA: Objection to form 24 and foundation. 25 A. I don't know what the ages were of
1 2	G. Maxwell - Confidential  [REDACTED]	Page 63
1 2		Page 65
1 2		1 G. Maxwell - Confidential 2 the people who were giving him massages, but 3 I believe they were professional masseuses. 4 Q. I think you testified that you 5 believe that Virginia Roberts was a 6 professional masseuse, is that correct? 7 MR. PAGLIUCA: Objection to form 8 and foundation. 9 A. Based on how allegedly we met, 10 which was at a spa, I believe that when you 11 work at a spa, you are a professional. So 12 I'm basing my statement based on her working 13 as a professional massage person, at a 14 professional spa. 15 Q. When you met Ms. Roberts at the 16 spa, what spa was it? 17 MR. PAGLIUCA: Objection to form 18 and foundation. 19 A. I don't recall the actual meeting, 20 but based on all the evidence and stories, it 21 was at Mar-a-Lago. 22 Q. You just testified that you met 23 Virginia Roberts at a spa. Do you recall 24 that? 25 MR. PAGLIUCA: Objection to form

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<p>1        G. Maxwell - Confidential  2        and foundation.  3        A. I said I don't recall the actual  4        meeting, but based on the evidence that we  5        have been produced, and I now believe it was  6        at Mar-a-Lago that that meeting may have  7        taken place.  8        Q. When you met Virginia Roberts, did  9        you understand that she was at that time a  10      professional masseuse?  11      MR. PAGLIUCA: Objection to form  12      and foundation.  13      A. I don't recall the actual first  14      meeting, I don't know.  15      Q. Whether or not you recall the  16      actual first meeting, was it your  17      understanding that Virginia Roberts was a  18      professional masseuse?  19      MR. PAGLIUCA: Objection to form  20      and foundation.  21      A. I had no idea at the time, but I  22      believe she was working at a spa, and based  23      on what I believe today, she was a masseuse  24      at Mar-a-Lago.  25      Q. When you say based on what you</p>	<p>1        G. Maxwell - Confidential  2        conversations with Virginia. Like I said, I  3        would actually barely remember her at all  4        were it not for this case.  5        Q. Why, then, do you believe she was a  6        masseuse at Mar-a-Lago?  7        A. Based on having met her at  8        Mar-a-Lago. I don't know why else she would  9        be at the house.  10      Q. At what house?  11      A. Why would she come to Jeffrey's  12      house if she was not a masseuse at  13      Mar-a-Lago, why else would she come.  14      Q. Did you ask her to come to  15      Jeffrey's house?  16      A. I don't recall the first meeting or  17      how it went down that she came to give  18      Jeffrey a massage or whatever she came to do.  19      All I remember as I testified in my first  20      deposition is that her mother came and that  21      we sat outside and I talked to her mother,  22      and that she went in and met Jeffrey and then  23      she left. And then subsequent to that, I  24      understand she gave him massages.  25      Q. My question was a simple yes or no</p>
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<p>1        G. Maxwell - Confidential  2        believe today, you believe she was a masseuse  3        at Mar-a-Lago, what is it that you've learned  4        that leads you to believe she was a masseuse  5        at Mar-a-Lago?  6        A. She worked at the spa, and that's  7        all I know, that she was 17 and that she held  8        herself out to be a masseuse.  9        Q. She told you she was a masseuse?  10      A. I don't know if she told me at the  11      time she was a masseuse. I believe today she  12      was a masseuse working at Mar-a-Lago and she  13      was 17 years old.  14      Q. You said she held herself out as a  15      masseuse. Do you recall that?  16      A. I just said it. The problem is I  17      don't recall with specificity. I don't  18      recall the actual meeting, so events in my  19      mind are conflated with all of her stories,  20      all of the lies that have been told.  21      So, today, I believe that she was a  22      17-year-old masseuse at Mar-a-Lago.  23      Q. Did she ever tell you that she was  24      a masseuse at Mar-a-Lago?  25      A. I don't recall specific</p>	<p>1        G. Maxwell - Confidential  2        question. Did you ask her to come to  3        Jeffrey's house?  4        A. I can't recall exactly the meeting.  5        Q. In response, I got a paragraph that  6        makes a number of assertions that I'm now  7        going to have to follow-up. I'm prepared to  8        do that, but in light of your counsel's  9        desire to move the deposition along, I won't  10      have to follow-up things that you volunteer  11      if you don't volunteer them.  12      So if you will focus on my  13      question, and if it is simply a yes or no  14      answer and you give a yes or no answer, that  15      will shorten the deposition. If you want to  16      say other things, I'm not going to try to  17      stop you, but I am going to follow-up on what  18      you say.  19      My question now is simply, do you  20      recall, one way or the other, as you sit here  21      now, whether you asked Virginia Roberts to  22      come to Mr. Epstein's house?  23      A. I do not.  24      Q. Do you recall, as you sit here now,  25      one way or another, whether Virginia Roberts</p>

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<p>1        G. Maxwell - Confidential  2        was a masseuse, a towel girl, a maintenance  3        person or any other type employee at  4        Mar-a-Lago?  5        A. I do not.  6        Q. Did Mr. Epstein ever ask you to  7        attempt to obtain or secure people to give  8        him massages that were not professional  9        masseuses?  10       A. No.  11       Q. Do you remember somebody by the  12       name of [REDACTED]  13       A. I don't believe I ever met him.  14       Q. You don't believe you ever met him?  15       A. No.  16       Q. Do you remember anyone other than  17       yourself who secured or obtained people to  18       give Mr. Epstein massages?  19       MR. PAGLIUCA: Objection to form  20       and foundation.  21       A. Can you ask the question again,  22       please?  23       Q. Do you remember anyone other than  24       yourself who secured or obtained people to  25       give Mr. Epstein massages?</p>	<p>1        G. Maxwell - Confidential  2        covered extensively.  3        MR. BOIES: I understand what the  4        prior deposition --  5        A. Other than friends of my family and  6        friends of other people's people, and the  7        people that I've identified, I am aware that  8        Jeffrey had friends that came over that  9        brought their kids with them from time to  10       time.  11       Q. These kids that you refer to, they  12       didn't give Mr. Epstein massages, did they?  13       MR. PAGLIUCA: Mr. Boies, this has  14       been asked and answered already.  15       MR. BOIES: I don't think that  16       particular question was asked and  17       answered, but whether it was asked and  18       answered or not, you can instruct not to  19       answer and then we will move on. I  20       think we take much more time with your  21       interjections than we would if you  22       simply let the witness answer the  23       question.  24       MR. PAGLIUCA: Well, we do, but  25       then we go down this road where you keep</p>
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<p>1        G. Maxwell - Confidential  2        MR. PAGLIUCA: Objection to form  3        and foundation.  4        A. I believe Jeffrey did get massages  5        from other people who were recommendations  6        from other people for massages that had  7        nothing to do with me.  8        Q. Do you know who?  9        A. I only know what I read. Virginia  10       gave people.  11       Q. Other than what Virginia had said  12       in the last 10 years, were you aware of  13       anyone who was obtaining people to give  14       Mr. Epstein massages other than yourself?  15       A. I'm not -- I don't know what other  16       people do. I know that other people  17       recommended massages to him, but I can't  18       testify to what other people do for him or  19       did for him.  20       Q. Back in the 1990s and the 2000s,  21       did you see women under the age of 21 at  22       Mr. Epstein's houses?  23       MR. PAGLIUCA: This has been asked  24       and answered in her prior deposition.  25       Do you understand that? It's been</p>	<p>1        G. Maxwell - Confidential  2        asking these questions that have already  3        been asked and answered.  4        So the witness can answer the  5        question, but let's stick to the topic  6        here.  7        MR. BOIES: If you want to instruct  8        her not to answer, instruct her not to  9        answer. You are not going to convince  10       me with speeches.  11       A. What is the question, please?  12       Q. You referred to friends of  13       Mr. Epstein bringing their kids with them  14       when they came over?  15       A. Yes.  16       Q. Those kids, as you described, did  17       not give Mr. Epstein massages, correct?  18       A. I don't believe so.  19       Q. Limiting the people that we're  20       talking about just to people who gave  21       Mr. Epstein massages or who were brought to  22       the home to give Mr. Epstein massages, were  23       there people other than you who were  24       responsible for bringing those people to Mr.  25       Epstein's house?</p>

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	Page 74	Page 76
1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	MR. PAGLIUCA: Objection to form	2 Q. Where did she go to massage school?
3	and foundation.	3 A. I don't know.
4	A. I have no idea.	4 Q. When did she go to massage school?
5	[REDACTED]	5 A. I don't know.
12	Q. Did [REDACTED] ever give Mr. Epstein a	6 Q. Did she tell you she went to
13	massage?	7 massage school?
14	A. I believe she did.	8 A. I don't recall.
15	Q. Did she ever give you a massage?	9 Q. Did someone else tell you she went
16	A. She did.	10 to massage school?
17	Q. Was she what you referred to as a	11 A. I don't recall. It's my belief she
18	professional masseuse?	12 went to massage school and became a
19	A. I would.	13 professional masseuse at some point.
20	Q. Had she ever worked in a spa?	14 Q. What is your belief based on?
21	A. I don't know if she worked in a	15 A. I don't know why, it's just
22	spa.	16 something, I must have had a conversation
23	Q. Had she ever, prior to giving you	17 with her, I think, about it, but I don't
24	and Mr. Epstein massages, had she ever given	18 recall specifically the conversation. Just
25	massages to other people?	19 in general terms, that's what I believe.
	Page 75	20 Q. Is it your testimony that she told
1	G. Maxwell - Confidential	21 you in general terms in a conversation that
2	MR. PAGLIUCA: Objection to form	22 she had gone to massage school?
3	and foundation.	23 A. I don't recall a specific
4	A. I have no idea, I don't know.	24 conversation, but that is my general
5	Q. Prior to the time that [REDACTED] gave	25 impression.
6	you and Mr. Epstein massages, had she been a	
7	professional masseuse?	
8	MR. PAGLIUCA: Objection to form	
9	and foundation.	
10	A. I believe she went to massage	
11	school and became a professional masseuse.	
12	Q. Did she go to massage school before	
13	or after you met her?	
14	A. I believe after.	
15	Q. Who paid for her massage school?	
16	A. I have no idea.	
17	Q. Who arranged for her to go to	
18	massage school?	
19	A. I have no idea.	
20	Q. Did she ever give Mr. Epstein a	
21	massage before she went to massage school?	
22	A. I have no idea.	
23	Q. Did she ever give you a massage	
24	before she went to massage school?	
25	A. I have no idea.	
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1	G. Maxwell - Confidential	
2	Q. Do you know how long she was in	
3	massage school?	
4	A. I don't.	
5	Q. Did Mr. Epstein ask her to go to	
6	massage school?	
7	A. I don't know.	
8	Q. How old was [REDACTED] when she gave	
9	you a massage?	
10	A. Mid 20s, I believe.	
11	Q. And was the timeframe in which she	
12	gave Mr. Epstein a massage the same timeframe	
13	she gave you a massage?	
14	A. I really don't recall. I can only	
15	recall her giving me massages. I know she	
16	gave Mr. Epstein massages, but I don't recall	
17	them. I know she gave me them, I know she	
18	gave me massages.	
19	Q. How old was she when she gave	
20	Mr. Epstein massages?	
21	A. I met her, I believe, when she was	
22	in her mid 20s, it would have been in her	
23	mid 20s.	
24	Q. Did Mr. Epstein, insofar as you	
25	believe, engage in sexual activities with	

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1	G. Maxwell - Confidential	
2	[REDACTED]	
3	A. I would not know. I would say no.	
4	Q. Did you engage in sexual activities	
5	with [REDACTED]	
6	A. No.	
7	Q. Do you know how [REDACTED] came to	
8	know Mr. Epstein?	
9	A. I met her at her university [REDACTED]	
10	[REDACTED]	
11	[REDACTED]	
12	A. In Palm Beach.	
13	Q. At Mr. Epstein's home in Palm	
14	Beach?	
15	A. Yes.	
16	Q. So is it fair to say tha [REDACTED]	
17	[REDACTED]	
18	MR. PAGLIUCA: This has already	
19	been testified to Mr. Boies. We are	
20	repeating testimony now.	
21	MR. BOIES: I think in the context	
22	of the witness' answers, these are fair	
23	questions.	
24		
25		
	Page 79	Page 81
1	G. Maxwell - Confidential	
2	Now, I've asked you before, if you	
3	want to instruct her not to answer, if	
4	you want to go to the judge, we are	
5	happy to do that, but I would suggest,	
6	in the interest of moving it along, that	
7	you stop these speeches.	
8	MR. PAGLIUCA: You are not moving	
9	it along is the problem, so maybe we	
10	should call the court and get some	
11	direction here, because I am not going	
12	to sit here and rehash the testimony we	
13	already gave.	
14	MR. BOIES: That's fine.	
15	THE VIDEOGRAPHER: The time is	
16	10:51 a.m. and we are going off the	
17	record.	
18	(Whereupon, an off-the-record	
19	discussion was held.)	
20	THE VIDEOGRAPHER: The time is	
21	10:56 a.m. and we are going back on the	
22	record. This begins DVD No. 3.	
23	MR. BOIES: We have just had a call	
24	with Judge Sweet's chambers, Judge Sweet	
25	is not available and his chambers	

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. Was [REDACTED] paid for the massages</p> <p>3 that she gave you?</p> <p>4 A. I didn't pay her, so I believe she</p> <p>5 was paid.</p> <p>6 Q. Who paid her?</p> <p>7 A. I don't know who paid her.</p> <p>8 MR. PAGLIUCA: Again, you've</p> <p>9 already answered that there was no</p> <p>10 sexual activity between yourself and</p> <p>11 Mr. Epstein related to these massages.</p> <p>12 That's record testimony today. That's</p> <p>13 within the scope of the court's order.</p> <p>14 The rest of this is outside the scope of</p> <p>15 the court's order, and I instruct you</p> <p>16 not to answer.</p> <p>17 MR. BOIES: You are taking the</p> <p>18 position that as long as she said says</p> <p>19 that a massage did not involve sexual</p> <p>20 activity, we cannot ask about massages.</p> <p>21 That's your view?</p> <p>22 MR. PAGLIUCA: On this particular</p> <p>23 questioning, yes.</p> <p>24 BY MR. BOIES:</p> <p>25 Q. Did Mr. Epstein pay [REDACTED] for the</p>	<p>1 G. Maxwell - Confidential</p> <p>2 something the judge can decide, but a</p> <p>3 question as to how much this young girl</p> <p>4 was being paid for a "massage", I think</p> <p>5 goes directly to the issue of sexual</p> <p>6 activity.</p> <p>7 MR. PAGLIUCA: Here is the problem,</p> <p>8 Mr. Boies, at the first deposition,</p> <p>9 there were very limited instructions not</p> <p>10 to answer and the witness was not told</p> <p>11 not to answer questions about how much</p> <p>12 people were paid or not paid or any of</p> <p>13 those subject matters. The witness was</p> <p>14 only instructed not to answer about</p> <p>15 sexual activity concerning adults in the</p> <p>16 home.</p> <p>17 None of this came up during the</p> <p>18 deposition, and you just don't get a</p> <p>19 chance to redo the deposition because</p> <p>20 you feel like you want to.</p> <p>21 So the judge's order is in the</p> <p>22 context of the instructions to the</p> <p>23 witness not to answer in the first</p> <p>24 deposition, which is simply sexual</p> <p>25 activity involving adults, which was the</p>
<p>1 G. Maxwell - Confidential</p> <p>2 massages that she gave Mr. Epstein?</p> <p>3 MR. PAGLIUCA: You just asked this</p> <p>4 question, and I told her not to answer.</p> <p>5 I will tell her not to answer again for</p> <p>6 the same reasons.</p> <p>7 Q. Do you know how much Mr. Epstein</p> <p>8 paid Johanna to give massages?</p> <p>9 MR. PAGLIUCA: Same instruction to</p> <p>10 the witness. Why do you believe this is</p> <p>11 within the scope of the court's order?</p> <p>12 MR. BOIES: Because of the court's</p> <p>13 reference to massages, and because I</p> <p>14 think how much a girl [REDACTED]</p> <p>15 [REDACTED] was paid to give a</p> <p>16 "massage" goes to whether there actually</p> <p>17 was or was not sexual activity involved.</p> <p>18 MR. PAGLIUCA: The witness has</p> <p>19 testified there wasn't.</p> <p>20 MR. BOIES: Perhaps it will</p> <p>21 surprise you, I think it should not,</p> <p>22 that I do not believe in my deposition I</p> <p>23 need to simply accept her</p> <p>24 characterization without</p> <p>25 cross-examination. Now, that's</p>	<p>1 G. Maxwell - Confidential</p> <p>2 only area that the witness was precluded</p> <p>3 from talking about in the first</p> <p>4 deposition. So that's where we're at.</p> <p>5 MR. BOIES: I think that directly</p> <p>6 misreads the judge's order, including</p> <p>7 where it says: Defendant is ordered to</p> <p>8 answer questions relating to defendant's</p> <p>9 own sexual activity with or involving</p> <p>10 Jeffrey Epstein, with or involving</p> <p>11 plaintiff, with or involving underage</p> <p>12 females, involving or including massage</p> <p>13 with individuals defendant knew to be or</p> <p>14 believed might become known to Epstein.</p> <p>15 MR. PAGLIUCA: All of it is</p> <p>16 preceded by the word sexual activity.</p> <p>17 MR. BOIES: I think your point of</p> <p>18 view is an interesting one, but we will</p> <p>19 see what the judge rules on it.</p> <p>20 BY MR. BOIES:</p> <p>21 [REDACTED]</p>

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1 G. Maxwell - Confidential  
2 and foundation.  
3 A. [REDACTED]

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

10 A. I don't know.

11 Q. Did any of them give you massages?

12 A. No.

13 Q. [REDACTED]

17 MR. PAGLIUCA: Objection to form  
18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin  
21 Islands?

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

24 A. No.

25 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

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

10 A. I don't know.

11 Q. Did any of them give you massages?

12 A. No.

13 Q. [REDACTED]

17 MR. PAGLIUCA: Objection to form  
18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin  
21 Islands?

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

24 A. No.

25 [REDACTED]

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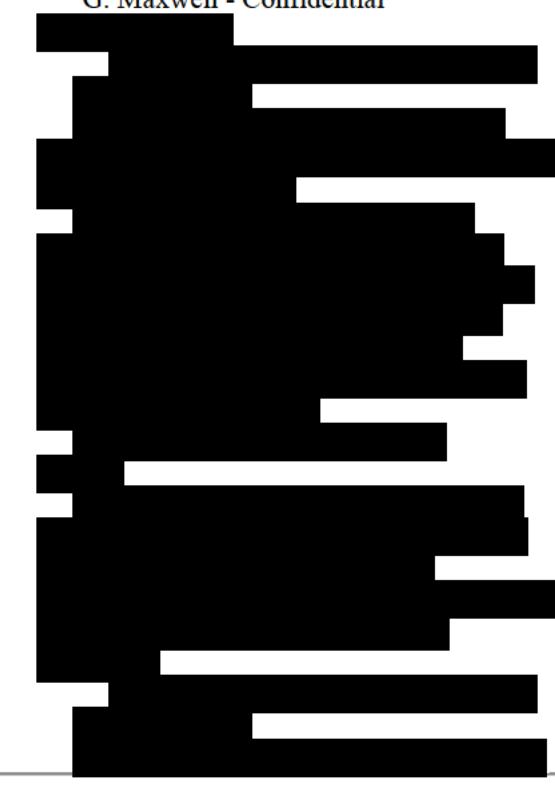
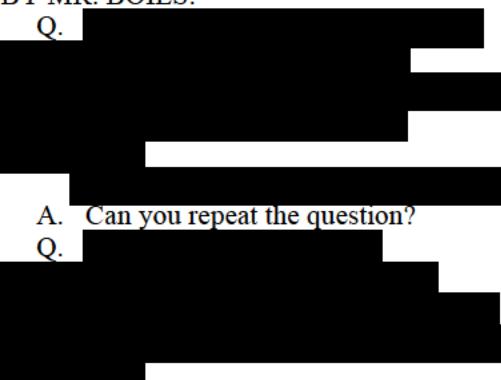
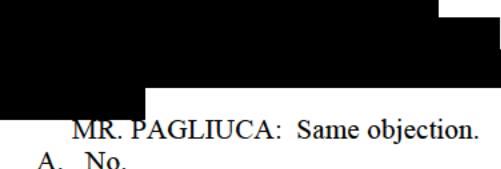
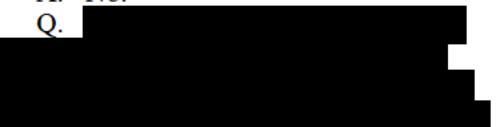
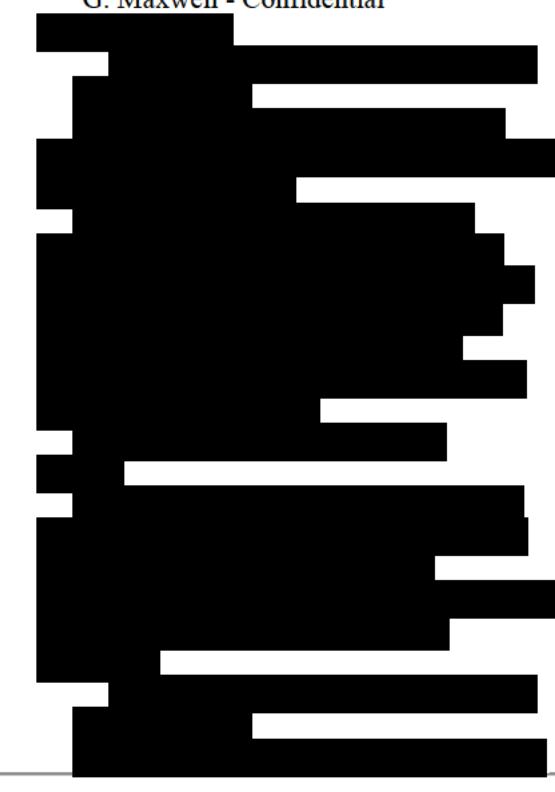
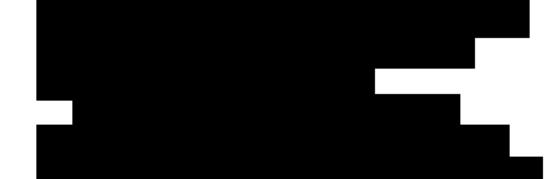
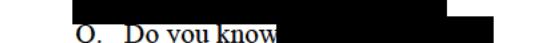
1 G. Maxwell - Confidential  
2 [REDACTED]

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

1 G. Maxwell - Confidential  
2 [REDACTED]

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

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1 2	G. Maxwell - Confidential 	G. Maxwell - Confidential 
	Page 91	Page 92
1 2 3 4 5 6 7 8 14 15 20 21 22	G. Maxwell - Confidential it to something in the case. MR. BOIES: I think it's tied, but if you instruct her not to answer, it goes into the -- MR. PAGLIUCA: Meat grinder. BY MR. BOIES: Q.  A. Can you repeat the question? Q.  MR. PAGLIUCA: Same objection. A. No. Q. 	G. Maxwell - Confidential     Q. Do you know 
25		Page 93

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<p>1 G. Maxwell - Confidential</p> <p>2 [REDACTED]</p> <p>3 A. I do.</p> <p>4 MR. BOIES: Let me show you a</p> <p>5 document that has been marked for</p> <p>6 identification as Maxwell Deposition</p> <p>7 Exhibit 27.</p> <p>8 (Maxwell Exhibit 27, Article,</p> <p>9 marked for identification, as of this</p> <p>10 date.)</p> <p>11 MR. PAGLIUCA: I'm going to need a</p> <p>12 moment to review this, counsel.</p> <p>13 MR. BOIES: Sure. Let me know when</p> <p>14 you are finished.</p> <p>15 MR. PAGLIUCA: I will.</p> <p>16 Okay.</p> <p>17 BY MR. BOIES:</p> <p>18 Q. Did you see this article prior to</p> <p>19 the time I'm showing it to you?</p> <p>20 A. No.</p> <p>21 Q. This is the first time you have</p> <p>22 seen this article?</p> <p>23 A. Yes.</p> <p>24 Q. When did you first meet [REDACTED]</p> <p>25 MR. PAGLIUCA: You are not</p>	<p>Page 94</p> <p>1 G. Maxwell - Confidential</p> <p>2 [REDACTED]</p> <p>3 Q. Who was [REDACTED]</p> <p>4 A. [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 Q. [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 A. Uh-huh.</p> <p>9 Q. Who was [REDACTED]</p> <p>10 A. [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 Q. Did you know [REDACTED]</p> <p>14 A. I did.</p> <p>15 Q. When did you first meet [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 A. I don't recall.</p> <p>18 Q. Did you see [REDACTED] at</p> <p>19 Mr. Epstein's house in Palm Beach?</p> <p>20 A. No, I don't think so.</p> <p>21 Q. Where did you see [REDACTED]</p> <p>22 A. I believe I met her in New York at</p> <p>23 some point.</p> <p>24 Q. Did you see [REDACTED] at</p> <p>25 Mr. Epstein's house in New York?</p>
<p>Page 95</p> <p>1 G. Maxwell - Confidential</p> <p>2 answering those questions. That has</p> <p>3 nothing to do with what we're here for</p> <p>4 today. We will take that up with the</p> <p>5 judge, if we need to.</p> <p>6 Q. Let me direct your attention to a</p> <p>7 portion of this article. Did [REDACTED] ever</p> <p>8 talk to you about women that she believed</p> <p>9 Mr. Epstein had had sex with?</p> <p>10 MR. PAGLIUCA: Don't answer that</p> <p>11 question. We will take that up with the</p> <p>12 judge.</p> <p>13 MR. BOIES: Okay.</p> <p>14 Q. Did [REDACTED] ever mention to you a</p> <p>15 [REDACTED]</p> <p>16 A. She did.</p> <p>17 Q. Did [REDACTED] ever mention to you an</p> <p>18 [REDACTED]</p> <p>19 A. She did.</p> <p>20 Q. When did [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 A. She called me and asked me, I don't</p> <p>23 know if she mentioned -- I want to take that</p> <p>24 back. I don't know if she mentioned [REDACTED]</p> <p>25 [REDACTED]. I think she just mentioned [REDACTED]</p>	<p>Page 97</p> <p>1 G. Maxwell - Confidential</p> <p>2 A. I don't recall meeting her there,</p> <p>3 but -- I may have, but I don't recall.</p> <p>4 Q. Did you ever meet [REDACTED]</p> <p>5 A. I did.</p> <p>6 Q. Where did you meet [REDACTED]</p> <p>7 A. She was in New Mexico.</p> <p>8 Q. At Mr. Epstein's property in New</p> <p>9 Mexico?</p> <p>10 A. Yes.</p> <p>11 Q. And did Mr. Epstein ever have sex</p> <p>12 with [REDACTED]</p> <p>13 A. I have no idea.</p> <p>14 Q. Did Mr. Epstein ever engage in</p> <p>15 sexual activities with [REDACTED]</p> <p>16 A. I have no idea.</p> <p>17 Q. Did Mr. Epstein ever engage in</p> <p>18 sexual activities with [REDACTED]</p> <p>19 A. I don't know, I don't think so.</p> <p>20 Q. Did [REDACTED] ever work for</p> <p>21 Mr. Epstein?</p> <p>22 A. I don't know.</p> <p>23 Q. Did [REDACTED] ever visit you at</p> <p>24 your apartment?</p> <p>25 A. I don't recall her ever coming.</p>

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1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	Q. Did you ever fly on Mr. Epstein's	2 wrote about them is somebody who talked
3	plane with [REDACTED]	3 to this witness about it, and I think
4	A. I don't remember.	4 that this is more than easily understood
5	Q. Did you ever fly on Mr. Epstein's	5 cross-examination.
6	plane with [REDACTED]	6 MR. PAGLIUCA: Your question was,
7	A. I don't think so.	7 do you know whether or not [REDACTED]
8	Q. Did [REDACTED] ever give	8 was ever at Mr. Wexner's property in
9	Mr. Epstein a massage?	9 Ohio.
10	A. I don't -- I have no idea.	10 MR. BOIES: Yes. And if you let
11	Q. Did [REDACTED]	11 her answer, you will see where it leads.
12	[REDACTED]	12 If you won't let her answer, the judge
13	A. I don't recall.	13 is going to determine it. And I just
14	Q. What did [REDACTED] tell you about	14 suggest to you that you stop these
15	[REDACTED] when she talked to you?	15 speeches and stop debating, because you
16	MR. PAGLIUCA: You don't have to	16 are not going to convince me not to
17	answer that. That has nothing to do	17 follow-up on these questions. If you
18	with the court's order and why we are	18 can convince the court to truncate the
19	here.	19 deposition, that's your right, but all
20	Q. Did [REDACTED]	20 you're doing is dragging this deposition
21	[REDACTED]	21 out.
22	had said that Mr. Epstein had engaged	22 MR. PAGLIUCA: You have the
23	in sexual activities with her?	23 opportunity to give me a good faith
24	A. She never said that.	24 basis why you are asking these
25	Q. Excuse me?	25 questions.
	Page 99	Page 101
1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	A. I don't recall ever hearing such a	2 MR. BOIES: I have given you a good
3	thing.	3 faith basis.
4	Q. You know Mr. Les Wexner, correct?	4 MR. PAGLIUCA: You haven't.
5	A. I do.	5 MR. BOIES: Then instruct not to
6	Q. Do you know whether or not [REDACTED]	6 answer.
7	[REDACTED] was ever at Mr. Wexner's property in	7 MR. PAGLIUCA: I am giving you the
8	Ohio?	8 opportunity to say why you are asking
9	MR. PAGLIUCA: Can you tell me how	9 the question, and why I'm telling her
10	that relates to this order, counselor?	10 not to answer and I am entitled to know
11	MR. BOIES: Yes, I think it goes	11 that.
12	directly to the sexual activity related	12 MR. BOIES: You are not entitled to
13	to [REDACTED] and what Mr. Epstein was	13 know why I'm asking the question. You
14	doing with [REDACTED]	14 are only entitled to know that it
15	Again, you can instruct not to	15 relates to the subject matter that I am
16	answer.	16 entitled to inquire about, and I don't
17	MR. PAGLIUCA: I'm trying to	17 think the judge is going to think that,
18	understand why you are asking these	18 you know, where Mr. Epstein shipped
19	questions before I --	19 [REDACTED] off to is outside the scope
20	MR. BOIES: I'm asking these	20 of what I'm entitled to inquire about.
21	questions because these are people who	21 THE WITNESS: Can we take a break?
22	not only have been publicly written	22 MR. BOIES: Only if you commit not
23	about in terms of the sexual activity	23 to talk to your counsel during the
24	that they were put into in connection	24 break.
25	with Mr. Epstein, but the person who	25 THE WITNESS: That's ludicrous.

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<p>1 G. Maxwell - Confidential</p> <p>2 MR. BOIES: You want a break to</p> <p>3 talk to your counsel, right?</p> <p>4 THE WITNESS: I want to use the</p> <p>5 bathroom.</p> <p>6 MR. BOIES: You want to talk to</p> <p>7 your counsel, right?</p> <p>8 THE WITNESS: I talk to my counsel</p> <p>9 all the time.</p> <p>10 MR. BOIES: I don't want you</p> <p>11 talking to your counsel while I'm in the</p> <p>12 middle of this examination.</p> <p>13 MR. PAGLIUCA: I'm going to talk to</p> <p>14 her, so are we going to sit here and go</p> <p>15 for the rest of the day until we're</p> <p>16 done?</p> <p>17 MR. BOIES: No, but I'm going to go</p> <p>18 through the rest of this line of</p> <p>19 questioning, unless you take her and</p> <p>20 walk out and then, I'm going to protest</p> <p>21 that to the judge.</p> <p>22 MR. PAGLIUCA: He is refusing a</p> <p>23 bathroom break to you right now.</p> <p>24 MR. BOIES: No, I'm not. I'm happy</p> <p>25 to have her take a bathroom break as</p>	<p>1 G. Maxwell - Confidential</p> <p>2 a mother and her daughters who came from</p> <p>3 Phoenix. The oldest daughter, an artist,</p> <p>4 whose character was vouchsafed to me by</p> <p>5 several sources, including the artist, Eric</p> <p>6 Fischl, had told me weeping as she sat in my</p> <p>7 living room, of how Epstein had attempted to</p> <p>8 seduce both her and separately and her</p> <p>9 younger sister, then only 16."</p> <p>10 Did Ms. Ward tell you that?</p> <p>11 A. No.</p> <p>12 Q. Did Ms. Ward tell you that her</p> <p>13 information was that [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 A. No.</p> <p>17 Q. Did you and Mr. Epstein visit [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 A. I don't know I would characterize</p> <p>20 the word visit with Mr. Epstein. We went for</p> <p>21 business in Ohio because he worked with</p> <p>22 Mr. Wexner, and I accompanied him on a few</p> <p>23 visits.</p> <p>24 Q. Did you and Mr. Epstein go to Ohio,</p> <p>25 and while you were in Ohio, see [REDACTED]</p>
<p>1 G. Maxwell - Confidential</p> <p>2 long as she doesn't use it as an excuse</p> <p>3 to get coached by her lawyer.</p> <p>4 THE WITNESS: For the record, I</p> <p>5 want to object strongly to that.</p> <p>6 MR. PAGLIUCA: You don't talk now.</p> <p>7 Do you want to go to the bathroom?</p> <p>8 THE WITNESS: Yes.</p> <p>9 MR. PAGLIUCA: How about if I stay</p> <p>10 here, Mr. Boies, will that work for you?</p> <p>11 MR. BOIES: Absolutely.</p> <p>12 THE VIDEOGRAPHER: The time is</p> <p>13 11:31, and we are going off the record.</p> <p>14 (Recess.)</p> <p>15 THE VIDEOGRAPHER: The time is</p> <p>16 11:34 a.m. and we are back on the</p> <p>17 record. This also begins DVD No. 4.</p> <p>18 BY MR. BOIES:</p> <p>19 Q. Let me approach it this way. If</p> <p>20 you turn to page 5 of 7 of the exhibit that</p> <p>21 is Vicky Ward's Daily Beast article. And if</p> <p>22 you look at the third paragraph where Ms.</p> <p>23 Ward writes: What I had "on the girls" were</p> <p>24 some remarkably brave first-person accounts.</p> <p>25 Three on-the-record stories from the family,</p>	<p>1 G. Maxwell - Confidential</p> <p>2 A. I believe actually that she was --</p> <p>3 stayed at his house there, so I would have</p> <p>4 seen her at the house. I believe I do recall</p> <p>5 seeing her at the house, actually.</p> <p>6 Q. When you say she stayed at the</p> <p>7 house, you are referring to [REDACTED]</p> <p>8 A. Yeah, I think [REDACTED] was</p> <p>9 painting or something in Ohio, and he let her</p> <p>10 stay at a place that he had.</p> <p>11 Q. When you say "he" let her stay, you</p> <p>12 are talking about Les Wexner?</p> <p>13 A. No, I'm talking about Jeffrey</p> <p>14 Epstein.</p> <p>15 Q. So when you saw [REDACTED] in</p> <p>16 Ohio, it was your understanding that she was</p> <p>17 staying at property that Mr. Epstein had in</p> <p>18 Ohio, is that correct?</p> <p>19 A. I don't know if it was his property</p> <p>20 or he rented it, I don't know what the nature</p> <p>21 was. It was a property that he had that she</p> <p>22 stayed at.</p> <p>23 Q. [REDACTED] was staying in Ohio at</p> <p>24 some property, and you don't know whose</p> <p>25 property it was, is that fair?</p>

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1 G. Maxwell - Confidential  
 2 A. I don't know what -- I don't know  
 3 who owned -- I don't know anything about the  
 4 ownership of the property or how Jeffrey had  
 5 it or why he stayed there, I don't know.

6 Q. Was it clear to you that Jeffrey  
 7 had arranged for [REDACTED] to stay at  
 8 wherever she was staying in Ohio?

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

11 A. I have no idea what the arrangement  
 12 was between [REDACTED] and Jeffrey.

13 Q. When you referred to the property  
 14 where [REDACTED] was staying, you said you  
 15 didn't know how Jeffrey had it?

16 A. What's your question?

17 Q. Was it your understanding that  
 18 Jeffrey did have that property that she was  
 19 staying at in some capacity or another,  
 20 either owning it or leasing it or having been  
 21 given it by a friend?

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

24 A. I have no idea.

25 Q. Where was this property that you

1 G. Maxwell - Confidential  
 2 house in Columbus, Ohio, correct?  
 3 A. I don't know the arrangement that  
 4 [REDACTED] had with Jeffrey. I believe she  
 5 was painting there, but I was never aware of  
 6 the arrangement. I know that I saw her in  
 7 Ohio at a house.

8 Q. When you were with [REDACTED] at  
 9 this house in Columbus, Ohio, Mr. Epstein was  
 10 with you, correct?

11 A. I went to Ohio with him on  
 12 business, and we were at a house that he  
 13 could stay at and I stayed at, and I recall  
 14 [REDACTED] being at this house. That is  
 15 what I recall.

16 Q. When you went to Ohio with  
 17 Mr. Epstein, did you see [REDACTED] on more  
 18 than one occasion?

19 A. I don't recall.

20 Q. You saw [REDACTED] in Ohio with  
 21 Mr. Epstein on at least one occasion,  
 22 correct?

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

25 A. I recall seeing her in Ohio, but I

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1 G. Maxwell - Confidential  
 2 and Mr. Epstein visited [REDACTED] at in  
 3 Ohio?

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

6 A. It was in Columbus.

7 Q. Was it a house or an apartment?

8 A. It was a house.

9 Q. When you and Mr. Epstein visited  
 10 [REDACTED] at this house in Columbus, was  
 11 anyone else in the house?

12 A. I never visited [REDACTED] at the  
 13 house.

14 Q. Did you see [REDACTED] in Ohio?

15 A. I recall seeing her, but I didn't  
 16 visit. I didn't go to Ohio to see [REDACTED]

17 [REDACTED].  
 18 Q. When you went to Ohio, did you see  
 19 [REDACTED]

20 A. I recall seeing [REDACTED] in  
 21 Ohio.

22 Q. Where did you see her?

23 A. I recall seeing her at this house  
 24 that Jeffrey stayed at.

25 Q. [REDACTED] was staying in the

1 G. Maxwell - Confidential  
 2 couldn't tell you how many times I saw her.  
 3 For sure once, because I have a recollection  
 4 of seeing her once.

5 Q. And the house in which you and  
 6 Mr. Epstein and [REDACTED] were in  
 7 Columbus, Ohio, was that a house that you and  
 8 Mr. Epstein were staying in overnight?

9 A. I stayed overnight there.

10 Q. Was [REDACTED] staying there  
 11 overnight?

12 A. I don't recall.

13 Q. How many nights did you and  
 14 Mr. Epstein stay in this house in Columbus?

15 A. I don't recall.

16 Q. Was it more than one?

17 A. I don't recall.

18 Q. The night or nights that you and  
 19 Mr. Epstein stayed at this house in Columbus,  
 20 was [REDACTED] there?

21 A. I don't recall.

22 Q. When you saw [REDACTED] in Ohio,  
 23 did you talk to her?

24 A. I'm assuming I must have said  
 25 hello, so yes.

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<p>Page 110</p> <p>1 G. Maxwell - Confidential  2 Q. Other than assuming you may have  3 said hello, did you have any conversations  4 with her?  5 A. Not that I recall.  6 Q. Did [REDACTED] complain to you or  7 Mr. Epstein about anything?  8 MR. PAGLIUCA: Objection to form  9 and foundation.  10 A. I don't know what she would have  11 done if she complained to Jeffrey about  12 anything, but she didn't complain to me, as  13 far as I recall.  14 Q. As far as you know, she didn't  15 complain to Mr. Epstein, is that correct?  16 A. I have no knowledge of what she did  17 or didn't do in that regard.  18 Q. Did she call the police or threaten  19 to call the police because of anything that  20 either you or Mr. Epstein did?  21 MR. PAGLIUCA: Objection to form  22 and foundation.  23 A. I never ever heard that.  24 Q. [REDACTED] didn't tell you, is your  25 testimony?</p>	<p>Page 112</p> <p>1 G. Maxwell - Confidential  2 ever see [REDACTED]  3 A. I don't recall ever seeing her.  4 Q. [REDACTED]  5 [REDACTED]  6 A. [REDACTED]  7 Q. Did [REDACTED] ever engage in any  8 sexual activity with Mr. Epstein?  9 A. I wouldn't know. I would assume  10 not, but I don't know.  11 Q. Do you have any reason to believe  12 that Mr. Epstein engaged in any sexual  13 activity with [REDACTED]  14 MR. PAGLIUCA: Objection to form  15 and foundation.  16 A. I wouldn't know.  17 Q. Did you ever give a massage to  18 anyone other than Mr. Epstein at any of Mr.  19 Epstein's properties?  20 A. First of all, I never said I gave  21 Mr. Epstein a massage.  22 Q. I will ask that question if you  23 want, but I was focusing on people other than  24 Mr. Epstein right now.  25 A. I don't give massages.</p>
<p>Page 111</p> <p>1 G. Maxwell - Confidential  2 MR. PAGLIUCA: Objection to form  3 and foundation.  4 A. My testimony is I never heard that,  5 period.  6 Q. That includes, I assume, that you  7 never heard that from [REDACTED] that's your  8 testimony?  9 MR. PAGLIUCA: Objection to form  10 and foundation.  11 A. I think you can safely say if  12 you've never heard it at all, it would  13 encompass anybody at all. It means you never  14 heard it, period.  15 Q. Did you ever see [REDACTED] in  16 Ohio?  17 A. Not that I recall.  18 Q. Where did you last see [REDACTED]  19 [REDACTED]  20 A. I only recall seeing her at the  21 ranch.  22 Q. In New Mexico?  23 A. Yeah.  24 Q. Other than seeing [REDACTED] at  25 Mr. Epstein's place in New Mexico, did you</p>	<p>Page 113</p> <p>1 G. Maxwell - Confidential  2 Q. Let's just tie that down. It is  3 your testimony that you've never given  4 anybody a massage?  5 A. I have not given anyone a massage.  6 Q. You never gave Mr. Epstein a  7 massage, is that your testimony?  8 A. That is my testimony.  9 Q. You never gave [REDACTED] a  10 massage is your testimony?  11 A. I never gave [REDACTED] a  12 massage.  13 Q. Did you, or to your knowledge,  14 Mr. Epstein pay for [REDACTED] to go to  15 Thailand?  16 MR. PAGLIUCA: Objection to form  17 and foundation.  18 A. I am not aware.  19 Q. Do you know whether [REDACTED]  20 went to Thailand?  21 A. I have no knowledge of anything  22 like that.  23 Q. Did you ever give anyone  24 instructions as to how to give a massage?  25 MR. PAGLIUCA: Objection to form</p>

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<p>Page 114</p> <p>1 G. Maxwell - Confidential 2 and foundation. 3 A. No. With a clarification, I do -- 4 I have very -- how to massage feet, pressure 5 points on a foot and pressure points on a 6 hand. 7 Q. Is what you're saying is that you 8 gave people instructions as to how to massage 9 feet and hands? 10 A. I have never given any 11 instructions. I have shown where pressure 12 points are on a hand and on a foot, but I 13 have never given instructions on how to do 14 it. I have demonstrated where a pressure 15 point on a hand and a foot is. 16 Q. Did you do that demonstration with 17 people who were giving or were planning to 18 give Mr. Epstein massages? 19 MR. PAGLIUCA: Objection to form 20 and foundation. 21 A. No, just in general, something 22 that I know how to do, so it would be just as 23 a general thing I have done. 24 Q. When you talk about general thing 25 you have done, is to tell people where the</p>	<p>Page 116</p> <p>1 G. Maxwell - Confidential 2 people how to give massage. Did you do that? 3 A. I have not done that. 4 Q. Did you ever tell or show people 5 how to give Mr. Epstein a massage? 6 A. No. 7 Q. Did you ever tell or show people at 8 Mr. Epstein's properties how to give 9 massages? 10 A. No. 11 Q. Did you at any time, at any of 12 Mr. Epstein's properties, tell or show anyone 13 how to give massages or how Mr. Epstein liked 14 massages? 15 MR. PAGLIUCA: Objection to form 16 and foundation. 17 A. No. I think Mr. Epstein is 18 perfectly capable -- 19 MR. PAGLIUCA: There is no question 20 pending. 21 Q. Did Mr. Epstein, in your presence, 22 ever tell or show anyone how he liked 23 massages? 24 A. I don't recall. 25 Q. Did Mr. Epstein ever tell you how</p>
<p>Page 115</p> <p>1 G. Maxwell - Confidential 2 pressure points are on hands and feet? 3 A. Yes. 4 Q. Did you ever use that knowledge to 5 try to show someone who was giving or was 6 planning to give Mr. Epstein a massage how to 7 do it? 8 MR. PAGLIUCA: Objection to form 9 and foundation. Asked and answered. 10 A. I am not aware of ever having done 11 that, but I am aware of having shown people 12 that there is a pressure point on the hand 13 and foot. I have no specific knowledge of 14 who. Just in general, I have done it. 15 Q. Did you show people pressure points 16 on hands and feet in Mr. Epstein's house in 17 Palm Beach? 18 A. I don't recall with specificity 19 where. I just know I do it because it's just 20 something that I happen to know, it helps 21 people, something I know. 22 Q. What I'm trying to be sure that I 23 have your testimony on is whether at any of 24 Mr. Epstein's properties, whether you call it 25 instructions or not, told people or showed</p>	<p>Page 117</p> <p>1 G. Maxwell - Confidential 2 he liked or didn't like massages given by any 3 particular person? 4 A. I can't recall. 5 Q. In other words, did he ever praise 6 to you or compliment to you some massage that 7 he had gotten or some person who had given 8 him a massage? 9 A. I'm sure in the course of time he 10 did, but I can't recall. 11 Q. Did he ever complain to you or 12 criticize the massage that anyone gave him? 13 A. Again, I don't recall. 14 Q. You know [REDACTED] 15 [REDACTED], correct? 16 A. I do. 17 Q. Did Mr. Epstein, insofar as you 18 have any reason to believe, ever engage in 19 sexual activities with her? 20 A. I have no knowledge. 21 Q. Did you ever engage in sexual 22 activities with [REDACTED] 23 A. No. 24 Q. Have you had any conversations with 25 [REDACTED] about Mr. Epstein's</p>

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 2 massages or sexual activities?  
 3 MR. PAGLIUCA: Objection to form  
 4 and foundation.  
 5 A. No.  
 6 Q. When was the last time you had any  
 7 communications with [REDACTED]  
 8 A. A long time ago. So long, I don't  
 9 recall.  
 10 Q. Were you aware that [REDACTED]  
 11 [REDACTED] was noticed for a deposition in this  
 12 case?  
 13 A. I believe I did know that, yes.  
 14 Q. Did you have any conversations with  
 15 anyone as to whether or not [REDACTED]  
 16 [REDACTED] would or should show up for that  
 17 deposition?  
 18 MR. PAGLIUCA: Wait a minute, what  
 19 does that have to do with the court's  
 20 order. Don't answer that question.  
 21 Just don't answer it. This is silly.  
 22 MR. BOIES: I actually think it is  
 23 far from silly. I think it goes to an  
 24 obstruction of justice situation that I  
 25 think you would be well advised to allow

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 2 your client to answer the question on.  
 3 MR. PAGLIUCA: Do you have a good  
 4 faith basis to suggest that she  
 5 suggested that [REDACTED] not show up at  
 6 her deposition yesterday?  
 7 MR. BOIES: I don't know whether it  
 8 was you, I don't know whether it was  
 9 her, I don't know who did it. What I do  
 10 know is that she didn't show up, and I  
 11 think the evidence will be quite clear  
 12 that your client's testimony about the  
 13 extent of her relationship with [REDACTED]  
 14 [REDACTED] is not accurate.  
 15 And in that context, I think the  
 16 circumstances under which it turns out  
 17 that she doesn't show up is entirely  
 18 appropriate for examination, but that is  
 19 something that I'm happy to talk to the  
 20 judge about.  
 21 MR. PAGLIUCA: Sure. And I hope  
 22 that you give him some good faith basis  
 23 for the assertions that you are making  
 24 here today, which are wholly improper.  
 25 MR. BOIES: I don't think they are

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1 G. Maxwell - Confidential  
 2 at all improper. I am not making any  
 3 assertions. I'm simply asking  
 4 questions. I'm trying to find out what  
 5 the facts are.  
 6 MR. PAGLIUCA: No, you are not.  
 7 MR. BOIES: Yes, I am. You are  
 8 trying to keep the facts from coming  
 9 out.  
 10 MR. PAGLIUCA: No, I'm not. I'm  
 11 trying to keep this orderly and not  
 12 abusive as to where it is going.  
 13 MR. BOIES: This is so far from  
 14 abusive.  
 15 MR. PAGLIUCA: I think we should  
 16 take a lunch break, given it is noon.  
 17 MR. BOIES: We will do it in a half  
 18 hour, I want to finish this line of  
 19 questioning. I will guarantee we are  
 20 out by 12:30.  
 21 BY MR. BOIES:  
 22 Q. Let me ask you about a few other  
 23 people. [REDACTED], do you know her?  
 24 A. I do.

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1 G. Maxwell - Confidential  
 2 Q. Is she anyone with whom Mr. Epstein  
 3 had sex?  
 4 MR. PAGLIUCA: Objection to form  
 5 and foundation.  
 6 A. I have no idea.  
 7 Q. Is she anyone with whom Mr. Epstein  
 8 engaged in sexual activities?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. I have no personal knowledge.  
 12 Q. When you say you have no personal  
 13 knowledge, what do you mean by personal  
 14 knowledge?  
 15 A. I mean that I've read the police  
 16 reports, so that's the only knowledge I have  
 17 of what [REDACTED] or anybody else has with  
 18 Jeffrey. I have no way of knowing whether  
 19 they did or not. Personal knowledge means  
 20 did I know myself.  
 21 Q. After you saw the police reports  
 22 about Mr. Epstein's relations with [REDACTED]  
 23 [REDACTED], did you ever talk to Mr. Epstein  
 24 about whether or not that police report was  
 25 or was not accurate?

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<p>1 G. Maxwell - Confidential  2 A. I have not.  3 Q. You did communicate with  4 Mr. Epstein after you saw that police report,  5 correct?  6 MR. PAGLIUCA: Objection to form  7 and foundation.  8 A. I don't know that's true.  9 Q. When did you see the police report?  10 MR. PAGLIUCA: If this involves  11 communications with me, I'm going to  12 instruct you not to answer the  13 questions.  14 Q. Is it your testimony that the only  15 time you saw the police reports was when it  16 was shown to you by your counsel?  17 A. That's the only time I recollect.  18 Q. What?  19 A. That's the only time I remember  20 seeing it.  21 Q. When did your counsel show you the  22 police report?  23 MR. PAGLIUCA: If you remember, you  24 can answer that question.  25 A. I don't know. I guess recently,</p>	<p>1 G. Maxwell - Confidential  2 A. A very long time ago.  3 Q. How long?  4 A. I think two years ago, something  5 like that.  6 Q. Before this defamation lawsuit?  7 A. Excuse me?  8 Q. Before this defamation lawsuit?  9 A. You are asking if I communicated  10 with him before the defamation? What are you  11 asking me?  12 Q. Have you communicated with  13 Mr. Epstein since this defamation lawsuit was  14 filed?  15 A. I don't believe I have. I haven't  16 spoken to him -- no, I don't think so. I  17 don't remember when it was filed, no, I don't  18 think so.  19 Q. By communication, I don't mean just  20 speaking to him. I mean writing him a  21 letter, email, communicated in any way?  22 A. No.  23 Q. When you say no, does that mean you  24 have not communicated with Mr. Epstein in any  25 way since this lawsuit was filed?</p>
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<p>1 G. Maxwell - Confidential  2 but I don't recall.  3 Q. In the last 30 days?  4 A. I really don't remember when I saw  5 it.  6 Q. Was the first time that you saw the  7 police report sometime this calendar year  8 2016?  9 A. I don't remember when I've seen  10 them. It's in the course of this latest  11 lies.  12 Q. What do you mean, in the course of  13 this latest lies?  14 A. In the course of this defamation  15 suit.  16 Q. And you may not be able to answer  17 this, but if you can, I just want to know.  18 When you saw the police report in the course  19 of this defamation suit, was it this calendar  20 year, that is 2016, sometime?  21 A. I don't know, I'm sorry, I have no  22 memory.  23 Q. When is the last time you had a  24 conversation or communication with  25 Mr. Epstein?</p>	<p>1 G. Maxwell - Confidential  2 A. I don't recall any communications  3 with him since this lawsuit has been filed.  4 Q. Did you ever discuss [REDACTED]  5 [REDACTED] with Mr. Epstein?  6 MR. PAGLIUCA: Objection to form  7 and foundation.  8 A. I would have had conversations with  9 him in general terms. Obviously I talked  10 about her with him but not in any context of  11 this situation. Just I will have talked to  12 him about her.  13 Q. When was the last time you talked  14 to Mr. Epstein about [REDACTED]  15 A. Probably in 2003, 2002.  16 Q. What was the subject matter of that  17 conversation?  18 A. I have no idea.  19 Q. Did it have anything to do with  20 Mr. Epstein's relationship with [REDACTED]  21 [REDACTED]  22 A. No, I have no idea. It would have  23 nothing to do with anything other than a  24 work-related issue.  25 Q. Did [REDACTED] work for</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 Mr. Epstein?</p> <p>3 A. I believe she did.</p> <p>4 Q. Was she working for Mr. Epstein in</p> <p>5 2003?</p> <p>6 A. I believe she was.</p> <p>7 Q. What was her job?</p> <p>8 A. I don't exactly know what her job,</p> <p>9 her responsibilities were.</p> <p>10 Q. Do you know any of job</p> <p>11 responsibilities?</p> <p>12 A. I believe she traveled with him and</p> <p>13 help managed the houses and run the staff and</p> <p>14 whatever else he asked her to do. She worked</p> <p>15 for Mr. Epstein, so you would have to ask</p> <p>16 him.</p> <p>17 Q. Was it your understanding that</p> <p>18 [REDACTED] at some point had had a</p> <p>19 sexual or romantic relationship with</p> <p>20 Mr. Epstein?</p> <p>21 A. I have no knowledge of that.</p> <p>22 Q. Let me go back to [REDACTED].</p> <p>23 Did you know, yourself, [REDACTED].</p> <p>24 A. I met her.</p> <p>25 Q. Where did you meet her?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 started, did you have any reason to believe</p> <p>3 that Mr. Epstein had engaged in sexual</p> <p>4 activities with [REDACTED]</p> <p>5 MR. PAGLIUCA: Objection to form</p> <p>6 and foundation.</p> <p>7 A. I don't -- I have no idea. It</p> <p>8 wouldn't be something I think about.</p> <p>9 Q. I'm sorry, say that again?</p> <p>10 A. I would have no idea.</p> <p>11 Q. Did [REDACTED], insofar as</p> <p>12 you were aware, ever give Mr. Epstein a</p> <p>13 massage?</p> <p>14 A. I have no idea.</p> <p>15 Q. Did you ever see her go into the</p> <p>16 massage room?</p> <p>17 A. Not that I recall, no.</p> <p>18 Q. Did you ever tell [REDACTED]</p> <p>19 that Mr. Epstein wanted her in the massage</p> <p>20 room?</p> <p>21 A. No.</p> <p>22 Q. Did you ever have any discussions</p> <p>23 with Mr. Epstein about [REDACTED]</p> <p>24 A. None.</p> <p>25 Q. Did you ever have any discussions</p>
<p>1 G. Maxwell - Confidential</p> <p>2 A. I don't recall where I met her, I</p> <p>3 just don't.</p> <p>4 Q. Did you meet her at one of</p> <p>5 Mr. Epstein's properties?</p> <p>6 A. It's possible, but I don't recall</p> <p>7 where I met her.</p> <p>8 Q. Did you ever see [REDACTED] at any of</p> <p>9 Mr. Epstein's properties?</p> <p>10 A. I believe that -- I believe on the</p> <p>11 island, I recall, maybe.</p> <p>12 Q. Virgin Islands?</p> <p>13 A. Virgin Islands.</p> <p>14 Q. Did [REDACTED] work for Mr. Epstein?</p> <p>15 A. I don't know.</p> <p>16 Q. Did [REDACTED] travel with Mr. Epstein?</p> <p>17 A. I don't know. If she was on the</p> <p>18 island, then presumably she did. I don't</p> <p>19 recall.</p> <p>20 Q. Did you ever see [REDACTED]</p> <p>21 at any of Mr. Epstein's properties other than</p> <p>22 in the Virgin Islands?</p> <p>23 A. Not that I recall.</p> <p>24 Q. Leaving aside anything that you</p> <p>25 have learned since this defamation suit</p>	<p>1 G. Maxwell - Confidential</p> <p>2 with [REDACTED] about Mr. Epstein?</p> <p>3 A. None.</p> <p>4 Q. Do you know how much money, if any,</p> <p>5 Mr. Epstein paid [REDACTED]</p> <p>6 A. I have no idea, no, I have no idea.</p> <p>7 Q. Do you know whether Mr. Epstein</p> <p>8 paid [REDACTED], even if you don't know</p> <p>9 the amount?</p> <p>10 A. No, I would not know that.</p> <p>11 Actually, I don't, I don't recall any</p> <p>12 conversation --</p> <p>13 MR. PAGLIUCA: There is no question</p> <p>14 pending.</p> <p>15 Q. Do you know who [REDACTED]</p> <p>16 is?</p> <p>17 A. Yes.</p> <p>18 Q. Would you identify him for the</p> <p>19 record?</p> <p>20 A. [REDACTED]</p>

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<p>1 G. Maxwell - Confidential  2 in Palm Beach in the 1990s and 2000s?  3 A. I don't believe so.  4 Q. [REDACTED] for  5 Mr. Epstein?  6 A. I believe late -- middle of 2000s.  7 2004, 2005, something like that.  8 Q. When he became [REDACTED]  9 [REDACTED], did he work for Mr. Epstein in  10 Palm Beach?  11 A. I believe he did.  12 Q. And did you see [REDACTED] at  13 Mr. Epstein's Palm Beach residence while [REDACTED]  14 [REDACTED]  15 A. I was not in Palm Beach when he was  16 working for Mr. Epstein.  17 Q. I think you answered the question,  18 but I want to be absolutely certain. Is it  19 your testimony that you never saw  20 [REDACTED] at Mr. Epstein's Palm Beach  21 residence?  22 A. That is not my testimony.  23 Q. Did you ever see [REDACTED] at  24 Mr. Epstein's Palm Beach residence?</p>	<p>1 G. Maxwell - Confidential  2 Q. Did you see [REDACTED] at Mr.  3 Epstein's Palm Beach residence in 2005?  4 A. I don't recall going to the house  5 in 2005, but if I was there and he was  6 working, I would have seen him.  7 Q. Do you recall, as you sit here now,  8 one way or another, whether you were at Mr.  9 Epstein's Palm Beach residence in 2005?  10 A. I don't recall going to the house  11 in 2005, but if I did go, I would have seen  12 him. And if I did go, it would have been  13 once, maybe, I maybe went to the house in  14 2005, I don't recall.  15 Q. If you went to the house in 2005,  16 is it your testimony it would have only been  17 once?  18 A. Sounds about right, maybe twice. I  19 was not in Palm Beach in 2005.  20 Q. For you to have been at Mr.  21 Epstein's house in Palm Beach, you would have  22 had to have been in Palm Beach, right?  23 A. I would have had to have been in  24 Palm Beach to be at his house in Palm Beach,  25 of course.</p>
<p>Page 131</p> <p>1 G. Maxwell - Confidential  2 A. I'm sure I did because I would have  3 seen him. I'm sure I did see him but -- yes,  4 I would have seen him.  5 Q. When did you see [REDACTED] at  6 Mr. Epstein's Palm Beach residence?  7 A. If I'm right and I could -- the  8 dates are a bit off, Mr. Epstein's mother  9 died, I think [REDACTED] was working for  10 Mr. Epstein at that time, and I helped with  11 the funeral arrangements and I would have  12 seen him at that point.  13 Q. Other than the one occasion when  14 Mr. Epstein's mother died, we can figure out  15 what the date of that was --  16 A. I don't have all the dates in my  17 head.  18 Q. Other than the one occasion when  19 Mr. Epstein's mother died, did you ever see  20 [REDACTED]  21 A. In that period of time when I went  22 very infrequently to Palm Beach, I don't know  23 how many times, maybe once or twice and had  24 he been at the house, I would have seen him,  25 so there would have been very few times.</p>	<p>Page 133</p> <p>1 G. Maxwell - Confidential  2 Q. So when you say you were not in  3 Palm Beach in 2005, does that mean it is your  4 testimony you were not at Mr. Epstein's house  5 in Palm Beach in 2005?  6 A. I don't recall being at Mr.  7 Epstein's house in 2005, I don't really  8 recall being in Palm Beach in 2005, and if I  9 was in Palm Beach in 2005, I may not have  10 stayed at his house.  11 Q. Is it your testimony that the most  12 you would have been at Mr. Epstein's house in  13 Palm Beach in 2005 was once or twice, if  14 that?  15 A. To the best of my recollection,  16 that sounds about right. But I really don't  17 recall, 2005 is a long time ago, I just don't  18 recall.  19 Q. You were continuing to work for  20 Mr. Epstein in 2005?  21 A. I was helping out in just very  22 specific areas of staffing of the houses and  23 some architectural details and decorating.  24 Q. You were getting paid?  25 MR. PAGLIUCA: We've gone over</p>

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<p>1 G. Maxwell - Confidential  2 this. You don't need to testify about  3 this again. We will take it up with the  4 judge, if we need to. I let this go on  5 for 15 minutes about Palm Beach.</p> <p>6 MR. BOIES: I ask the question, you  7 give the instruction, the judge decides.</p> <p>8 Q. In 2005, were you assisting in the  9 arranging of massages for Mr. Epstein?</p> <p>10 A. No.</p> <p>11 Q. Not at all is your testimony?</p> <p>12 A. Correct.</p> <p>13 MR. BOIES: This is a good time to  14 take a lunch break.</p> <p>15 MR. PAGLIUCA: Okay. I don't  16 intend on being here all day, so if you  17 have some important questions you want  18 to ask, you may want to get to those.</p> <p>19 MR. BOIES: You can walk out any  20 time you want.</p> <p>21 MR. PAGLIUCA: We are getting  22 close.</p> <p>23 MR. BOIES: The judge will decide  24 whether that's appropriate or not.</p> <p>25 MR. PAGLIUCA: We are getting</p>	<p>Page 134</p> <p>1 G. Maxwell - Confidential  2 A F T E R N O O N S E S S I O N  3 (Time noted: 1:16 p.m.)</p> <p>5 G H I S L A I N E M A X W E L L ,  6 resumed and testified as follows:</p> <p>8 THE VIDEOGRAPHER: The time is 1:16  9 p.m., and we are back on the record.</p> <p>10 This also begins DVD No. 5.</p> <p>11 MR. PAGLIUCA: One housekeeping  12 matter before you get started. The  13 original deposition was as confidential  14 and we would designate this continued  15 deposition as confidential as well.</p> <p>16 MR. BOIES: Okay.</p> <p>17 Let me ask you to look at a  18 document that has been marked as Maxwell  19 Deposition Exhibit 28. This is another  20 list of names.</p> <p>21 (Maxwell Exhibit 28, List of names,  22 marked for identification, as of this  23 date.)</p> <p>24 Q. What I would ask you to do is to  25 identify the names that are here that you do</p>
<p>Page 135</p> <p>1 G. Maxwell - Confidential  2 close.</p> <p>3 THE VIDEOGRAPHER: It's 12:15 p.m.  4 and we are going off the record.</p> <p>5 (Whereupon, a luncheon recess was  6 taken at 12:15 p.m.)</p> <p>7 * * *</p>	<p>Page 137</p> <p>1 G. Maxwell - Confidential  2 not recognize. That is, I think you will  3 recognize most of the names --</p> <p>4 MR. POTTINGER: Excuse me one  5 second.</p> <p>6 Q. What I was saying was that I would  7 like you to look at the names here and tell  8 me which names you do not recognize.</p> <p>9 A. I pretty much recognize these  10 names. I don't know everybody very well, but  11 I recognize the names.</p> <p>12 Q. You know who they are?</p> <p>13 A. I don't know if I know who they  14 are. I recognize the names.</p> <p>15 Q. Are most of the people on this list  16 people that you've met before?</p> <p>17 MR. PAGLIUCA: Objection to form  18 and foundation.</p> <p>19 A. I believe I've met pretty much  20 everybody on this list.</p> <p>21 Q. Who on the list have you not met?</p> <p>22 A. I think I met them all.</p> <p>23 Q. Now, were all of these people  24 people that at one time or another you were  25 with with Mr. Epstein?</p>

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1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	MR. PAGLIUCA: Objection to form	2 and foundation.
3	and foundation.	3 A. Eva Anderson was his girlfriend.
4	A. I believe so.	4 Q. I am sorry?
5	Q. Were any of these people on the	5 A. Eva Anderson was his girlfriend.
6	list, obviously leaving aside Mr. Epstein	6 Q. When was Eva Anderson Mr. Epstein's
7	himself, people who, to your knowledge,	7 girlfriend?
8	received massages at one or more of Mr.	8 A. I don't know the dates, but I
9	Epstein's properties?	9 believe in the '80s.
10	MR. PAGLIUCA: Objection to form	10 Q. In the 1980s?
11	and foundation.	11 A. Yeah, and part of the 1990s, I
12	A. I couldn't say.	12 believe. So I don't know when they started
13	Q. Are there any people on this list	13 and when they ended. They were in a
14	who you have reason to believe received	14 long-term relationship.
15	massages at one or more of Mr. Epstein's	15 Q. Was Mr. Epstein engaged in sexual
16	properties?	16 activities with Eva Anderson during the
17	MR. PAGLIUCA: Objection to form	17 period of time that you were involved with
18	and foundation.	18 Mr. Epstein?
19	A. I couldn't say.	19 A. I wouldn't know.
20	Q. Just to be clear, my most recent	20 Q. How old was Eva Anderson when she
21	question is whether any of the people on this	21 was first involved with Mr. Epstein?
22	list are people who you have reason to	22 A. I don't know.
23	believe received massages at one of Mr.	23 Q. How old was Eva Anderson when you
24	Epstein's properties?	24 first met her?
25	MR. PAGLIUCA: Same objection.	25 A. I don't recall.
	Page 139	Page 141
1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	A. I couldn't say.	2 Q. Did any of the people on this list,
3	Q. Why can't you say?	3 other than Mr. Epstein himself, and the list
4	A. Because I just don't know.	4 is Exhibit 28, ever ask you to arrange a
5	Q. Well, you know whether you have a	5 massage?
6	reason to believe, correct?	6 MR. PAGLIUCA: Objection to form
7	MR. PAGLIUCA: Objection to form	7 and foundation.
8	and foundation.	8 A. Not that I recall.
9	A. These are events that took place 17	9 Q. Did you arrange a massage for any
10	years ago, and I really do not know. It is	10 of the people on this list other than
11	possible that people on that list got a	11 Mr. Epstein?
12	massage, it's also possible they didn't. I	12 A. Not that I recall.
13	really don't know, leaving aside, of course,	13 Q. Were any of the people on this
14	Mr. Epstein himself.	14 list, other than Mr. Epstein, given a massage
15	Q. Yes.	15 at any of Mr. Epstein's residences?
16	MR. PAGLIUCA: One second, I'm	16 MR. PAGLIUCA: Objection to form
17	getting text messages.	17 and foundation. Asked and answered.
18	[REDACTED]	18 A. I wouldn't know.
22	Q. Are there any names on this list	19 Q. Did any of the people on this list,
23	that you have reason to believe Mr. Epstein	20 other than Mr. Epstein, engage in sexual
24	engaged in sexual activities with?	21 activities with anyone at Mr. Epstein's
25	MR. PAGLIUCA: Objection to form	22 properties?
		23 MR. PAGLIUCA: Objection to form
		24 and foundation.
		25 A. I wouldn't know.

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1 G. Maxwell - Confidential

2 Q. When you say I wouldn't know, I  
3 take it you mean to include that you  
4 testified that you do not know, is that  
5 correct?6 MR. PAGLIUCA: Objection to form  
7 and foundation.8 A. I would have no knowledge. I have  
9 no knowledge of what you are asking me.10 Q. Did you ever have conversations  
11 with anyone that were intended to convince  
12 them to engage in sexual activities with  
13 Mr. Epstein?14 MR. PAGLIUCA: Objection to form  
15 and foundation. This has been asked and  
16 answered in her previous deposition, by  
17 the way.

18 A. No.

19 Q. Did you ever tell anyone that  
20 Mr. Epstein was a scout for Victoria's  
21 Secret?

22 A. I don't recall saying that.

23 Q. Did you ever tell anyone that  
24 Mr. Epstein could get them a job with  
25 Victoria's Secret?

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2

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2 A. I don't recall saying that.

3 Q. Do you deny saying that, or do you  
4 simply say you don't recall, one way or  
5 another, whether you said it?6 MR. PAGLIUCA: This is outside the  
7 court's order, so I will tell you not to  
8 answer this, and we will take it up with  
9 the judge.

10

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2

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1 G. Maxwell - Confidential  
21 G. Maxwell - Confidential  
2

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1 G. Maxwell - Confidential  
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2

15 Q. Was there anything that occurred  
16 that led you to conclude that you didn't want  
17 to be there anymore?

18 A. I ceased to be happy in the job and  
19 I ceased to be happy spending time with  
20 Mr. Epstein.

21 Q. Was there anything that happened  
22 that you can identify that caused you to  
23 cease to be happy spending time with  
24 Mr. Epstein?

25 A. He became more difficult to work

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2 with.

3 Q. Was there any particular aspect of  
4 that that you can identify now?

5 A. Just general. Just doesn't work.

6 Q. Let me focus on [REDACTED]. Now,  
7 you testified that you have no reason to  
8 believe that [REDACTED] engaged in sexual  
9 activities with anyone at any of Mr.  
10 Epstein's residences, is that correct?

11 A. I would have no knowledge of that.

12 Q. Did you ever see [REDACTED] engage  
13 in sexual activities with anyone?

14 A. I did not.

15 Q. Did you ever see [REDACTED] taking  
16 photographs of people engaged in sexual  
17 activities?

18 A. I did not.

19 Q. I apologize for getting into  
20 something that is kind of an intimate area,  
21 but I need to establish this, in part because  
22 it relates to patterns of conduct, and I need  
23 to ask you some questions about your sexual  
24 activities with Mr. Epstein.

25 A. Okay.

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2 [REDACTED]

7 Q. Did you ever have conversations  
8 with anyone who was engaged in sexual  
9 activities with Mr. Epstein about those  
10 sexual activities?11 MR. PAGLIUCA: Objection to form  
12 and foundation.

13 A. I never had those conversations.

14 Q. So would it be your testimony that  
15 you never had any conversations about Mr.  
16 Epstein's sexual activities with [REDACTED]

17 [REDACTED]

18 A. I have never talked about sex with  
19 [REDACTED] at any point. I have hardly ever  
20 spoken to her.21 Q. Would your testimony be the same  
22 with respect to [REDACTED]23 A. That would be true, correct, I have  
24 not.

25 Q. And Virginia Roberts?

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1 G. Maxwell - Confidential

2 [REDACTED]

1 G. Maxwell - Confidential

2 A. Of course not.

3 Q. Were there any young men that, to  
4 your knowledge, would bring women over to  
5 Mr. Epstein's residences to perform services  
6 for Mr. Epstein?7 MR. PAGLIUCA: Objection to form  
8 and foundation.9 A. Can you repeat the question,  
10 please?11 Q. Were there any young men that, to  
12 your knowledge, would bring women over to  
13 Mr. Epstein's residences to perform services  
14 for Mr. Epstein?15 A. I have no idea what you are talking  
16 about, I'm sorry.17 Q. I'm talking about whether there  
18 were any young men that brought women over to  
19 Mr. Epstein's residence to perform services?20 A. I can't think of a single man in  
21 that context that I've ever met.22 Q. You testified earlier that you did  
23 not recall ever meeting [REDACTED], is  
24 that correct?

25 A. I don't believe I ever have.

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<p>Page 154</p> <p>1 G. Maxwell - Confidential  2 Q. Insofar as you were aware, did  3 Virginia Roberts ever have a male friend that  4 visited her at the Epstein residences?  5 A. I don't recall ever seeing a man  6 with Virginia. I believe she had a fiance  7 that I was aware of, I think, but that's all.  8 Q. When were you aware that Virginia  9 Roberts had a fiance?  10 A. I can't say I became aware from  11 reading all this stuff, or I was aware of it  12 at the time. I don't know.  13 Q. Did you ever meet Virginia Roberts'  14 fiance?  15 A. I don't think I ever did. I don't  16 recall meeting any men with Virginia.  17 Q. Do you know [REDACTED],  18 [REDACTED]  19 A. I never heard that name before.  20 Q. Have you ever heard the name of  21 [REDACTED]  22 A. I don't recollect that name at all.  23 MR. PAGLIUCA: Mr. Boies, those  24 names are on Exhibit 26, which we have  25 already gone over and she said she</p>	<p>Page 156</p> <p>1 G. Maxwell - Confidential  2 what has been going on, and I  3 attribute -- maybe I shouldn't attribute  4 it at all.  5 But if you want to instruct not to  6 answer, instruct not to answer. If you  7 don't, again, all I will do is request  8 that you cease your comments. I can't  9 do that. All I can do is seek sanctions  10 afterwards.  11 BY MR. BOIES:  12 Q. Ms. Maxwell.  13 A. Mr. Boies.  14 Q. What?  15 A. I'm replying. You said Ms.  16 Maxwell, I said Mr. Boies.  17 Q. Do you have a question?  18 A. No.  19 Q. I have a question.  20 A. I'm sure you do.  21 Q. During the time that you were in  22 the property or at the property that  23 Mr. Epstein has in the Virgin Islands, were  24 you aware of Mr. Epstein getting any  25 massages?</p>
<p>Page 155</p> <p>1 G. Maxwell - Confidential  2 didn't recognize those people, so now we  3 are just repeating things that we went  4 over.  5 MR. BOIES: I am in the context of  6 seeing if I can refresh her  7 recollection, because these are women  8 that [REDACTED], who she also does not  9 recall, brought over to Mr. Epstein's  10 residences, and I also want to make a  11 very clear record of what her testimony  12 is and is not right now.  13 Again, you can instruct her not to  14 answer if you wish.  15 MR. PAGLIUCA: I'm trying to get to  16 nonrepetitive questions here. You  17 basically asked the same question three  18 times. Then we get a pile of notes that  19 get pushed up to you, you read those.  20 Then you ask those three times, and then  21 we go to another question. So it's  22 taking an inordinately long amount of  23 time and it shouldn't.  24 MR. BOIES: I think that is a  25 demonstrably inaccurate statement of</p>	<p>Page 157</p> <p>1 G. Maxwell - Confidential  2 A. He did receive massages at the  3 Virgin Islands property.  4 Q. From whom did he receive massages  5 at the Virgin Islands?  6 A. There is a professional masseuse  7 and masseur that came from St. Thomas.  8 Q. This was somebody who came over  9 from St. Thomas for the day to give massages  10 and then left, or was that person a resident?  11 A. I believe, from memory, they came  12 over, gave a massage and left.  13 Q. And who arranged for this person to  14 come over from St. Thomas?  15 A. Probably the staff at the island.  16 Q. But you don't know?  17 A. The staff of the island would have  18 made those arrangements.  19 Q. Who at the staff?  20 A. Whoever would have been running the  21 island at that period of time.  22 Q. Do you know who that was?  23 A. I'm sorry, in this moment I can't  24 think of the names of the people who worked  25 on the island.</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. Did you ever arrange for anyone to</p> <p>3 give Mr. Epstein a massage at his Virgin</p> <p>4 Island property?</p> <p>5 A. I don't recall if I ever made a</p> <p>6 call to the massage people in St. Thomas. I</p> <p>7 don't recall.</p> <p>8 Q. Did Mr. Epstein ever receive</p> <p>9 massages at his Virgin Island property from</p> <p>10 people that he had brought with him on his</p> <p>11 plane from the United States?</p> <p>12 MR. PAGLIUCA: Objection to form</p> <p>13 and foundation.</p> <p>14 A. I don't know.</p> <p>15 Q. Did you ever participate in</p> <p>16 arranging for a massage for Mr. Epstein by</p> <p>17 someone who had been brought to the island on</p> <p>18 Mr. Epstein's plane?</p> <p>19 A. My memory of the massages on the</p> <p>20 island were from people who came from St.</p> <p>21 Thomas.</p> <p>22 Q. Does that mean that you never</p> <p>23 participated in arranging for a massage for</p> <p>24 Mr. Epstein at his Virgin Island property to</p> <p>25 be given by someone who had been brought to</p>	<p>1 G. Maxwell - Confidential</p> <p>2 A. It was a cabana, and also he had a</p> <p>3 beach place, a place on the beach where from</p> <p>4 time to time he would...</p> <p>5 Q. Did you ever see Mr. Epstein being</p> <p>6 given a massage in the beach area where he</p> <p>7 from time to time had massages?</p> <p>8 A. I don't have any recollection of a</p> <p>9 specific memory, but it was just on the</p> <p>10 beach, so there wouldn't be any privacy, he</p> <p>11 would just be getting a massage.</p> <p>12 Q. That would be visible to people who</p> <p>13 are on the beach, correct?</p> <p>14 A. It would be, yes.</p> <p>15 Q. Did you, at any time when you were</p> <p>16 there, see Mr. Epstein being given a massage</p> <p>17 in this beach area other than by a</p> <p>18 professional masseuse brought to the island</p> <p>19 from St. Thomas?</p> <p>20 A. I don't have any memory of -- I</p> <p>21 don't have a specific memory of seeing him</p> <p>22 get a massage on the beach. I just have an</p> <p>23 image of a massage on the beach, so I don't</p> <p>24 know who, I have no memory of it.</p> <p>25 Q. Whether or not you have a specific</p>
<p>1 G. Maxwell - Confidential</p> <p>2 the island on Mr. Epstein's plane?</p> <p>3 MR. PAGLIUCA: Objection to form</p> <p>4 and foundation.</p> <p>5 A. I don't recall, I have no idea.</p> <p>6 Q. Mr. Epstein did bring women to his</p> <p>7 Virgin Island property on his plane from time</p> <p>8 to time, right?</p> <p>9 MR. PAGLIUCA: Objection to form</p> <p>10 and foundation.</p> <p>11 A. People came to the island who were</p> <p>12 his guests.</p> <p>13 Q. And some of those guests, as you</p> <p>14 described it, were women, right?</p> <p>15 A. Indeed.</p> <p>16 Q. Did you ever participate in</p> <p>17 arranging for any of the women that came to</p> <p>18 Mr. Epstein's Virgin Island property to</p> <p>19 provide Mr. Epstein with a massage?</p> <p>20 A. No.</p> <p>21 Q. Where on the Virgin Island property</p> <p>22 did Mr. Epstein have his massages?</p> <p>23 A. I believe from memory he had them</p> <p>24 in the master cabana.</p> <p>25 Q. In what?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 memory of it, do you have a general memory</p> <p>3 that from time to time Mr. Epstein got</p> <p>4 massages down in the beach area?</p> <p>5 A. I have a general memory, I do.</p> <p>6 Q. Do you have a general memory that</p> <p>7 from time to time those massages were given</p> <p>8 to Mr. Epstein by people other than a</p> <p>9 professional masseuse brought to the island</p> <p>10 from St. Thomas?</p> <p>11 MR. PAGLIUCA: Objection to form</p> <p>12 and foundation.</p> <p>13 A. I have no idea who would be giving</p> <p>14 him a massage in that general memory of mine,</p> <p>15 so I can't say. The massages that I recall</p> <p>16 were from people from St. Thomas, and that's</p> <p>17 what I recall.</p> <p>18 Q. Did anyone ever complain to you</p> <p>19 that Mr. Epstein had demanded sex of them?</p> <p>20 MR. PAGLIUCA: Objection to form</p> <p>21 and foundation.</p> <p>22 A. Is that a question?</p> <p>23 Q. Yes.</p> <p>24 A. Never.</p> <p>25 Q. Do you know somebody named Reynaldo</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 Rizzo?</p> <p>3 A. I do not.</p> <p>4 Q. Who is he?</p> <p>5 A. I don't know him -- I know who he</p> <p>6 is now, but he worked, I believe, for Eva and</p> <p>7 Glenn, but prior to --</p> <p>8 Q. Eva and Glenn Dubin?</p> <p>9 A. Yeah.</p> <p>10 Q. It's your testimony you never met</p> <p>11 Mr. Rizzo?</p> <p>12 A. I don't recall ever meeting him.</p> <p>13 Q. Do you remember being at the</p> <p>14 Dubins' residence with Mr. Rizzo and with a</p> <p>15 [REDACTED]</p> <p>16 A. I do not.</p> <p>17 Q. Do you ever remember a [REDACTED] during</p> <p>18 the period of time that you were with</p> <p>19 Mr. Epstein?</p> <p>20 A. I do not.</p> <p>21 Q. Was there ever a time when you were</p> <p>22 at the Dubin residence with a girl under the</p> <p>23 age of 21 who had been with Mr. Epstein?</p> <p>24 MR. PAGLIUCA: Objection to form</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. No, no.</p> <p>5 Q. Let me see if I can possibly</p> <p>6 refresh your recollection. Do you recall</p> <p>7 being at the Dubin residence with [REDACTED]</p> <p>8 [REDACTED] that was crying and very</p> <p>9 distraught?</p> <p>10 A. I have never seen that.</p> <p>11 Q. Did you ever take the passport of</p> <p>12 any person who had told you that Mr. Epstein</p> <p>13 had demanded sex of them?</p> <p>14 A. No.</p> <p>15 Q. Were you ever at any residence of</p> <p>16 Mr. Epstein's when Alan Dershowitz was</p> <p>17 present?</p> <p>18 A. I'm sure I was.</p> <p>19 Q. Were you at Mr. Epstein's Palm</p> <p>20 Beach residence when Mr. Dershowitz was</p> <p>21 present?</p> <p>22 A. I may have been. It's possible.</p> <p>23 Q. Were you at Mr. Epstein's New</p> <p>24 Mexico property when Mr. Dershowitz was</p> <p>25 present?</p>
<p>1 G. Maxwell - Confidential</p> <p>2 and foundation.</p> <p>3 A. Can you repeat the question,</p> <p>4 please?</p> <p>5 Q. Sure.</p> <p>6 You remember from time to time</p> <p>7 being at the Dubin residence, correct?</p> <p>8 A. I do.</p> <p>9 Q. And I think you testified that you</p> <p>10 don't remember whether Mr. Rizzo was present</p> <p>11 on any of those occasions, although he might</p> <p>12 have been, correct?</p> <p>13 A. If Mr. Rizzo was standing right</p> <p>14 here in front of me, I wouldn't know who he</p> <p>15 is.</p> <p>16 Q. Does that mean you are saying that</p> <p>17 you never met him or simply that you don't</p> <p>18 remember him?</p> <p>19 A. I don't know if I ever met him, but</p> <p>20 if I saw him in a picture, maybe I would</p> <p>21 recognize it, but I don't believe I'd</p> <p>22 remember him.</p> <p>23 Q. Did you ever go to the Dubin</p> <p>24 residence with some woman who had previously</p> <p>25 been with Mr. Epstein?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 A. I don't have any memory of that,</p> <p>3 but it's possible. I just don't recall it.</p> <p>4 Q. Were you at Mr. Epstein's Virgin</p> <p>5 Islands property when Mr. Dershowitz was</p> <p>6 present?</p> <p>7 A. That I do recall, yes.</p> <p>8 Q. Were you at Mr. Epstein's New York</p> <p>9 property when Mr. Dershowitz was present?</p> <p>10 A. Again, it's possible, but I don't</p> <p>11 have a memory of it.</p> <p>12 Q. How many times do you recall being</p> <p>13 at Mr. Epstein's Virgin Island property when</p> <p>14 Mr. Dershowitz was also present?</p> <p>15 A. I only recall once.</p> <p>16 Q. When was that?</p> <p>17 A. I don't recall the date.</p> <p>18 Q. Who else was present on that time?</p> <p>19 A. I believe his wife and his</p> <p>20 daughter.</p> <p>21 Q. Anyone else?</p> <p>22 A. I don't recall anyone else.</p> <p>23 Q. Anyone else on the whole island. I</p> <p>24 don't just mean with him. I mean did</p> <p>25 Mr. Epstein have other guests with him at</p>

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1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	that time?	2 Q. I'm not now asking you about a
3	A. I don't recall anybody else.	3 conversation.
4	Q. How did you arrive there?	4 A. What are you asking me? Sorry.
5	A. I don't know.	5 Q. Do you recall ever seeing
6	Q. Did you come with Mr. Epstein?	6 Mr. Dershowitz at any of Mr. Epstein's
7	A. I don't know, I'm sorry.	7 residences other than the Virgin Island
8	Q. How did Mr. Dershowitz arrive	8 property?
9	there?	9 A. I don't have any specific
10	A. Again, I don't know.	10 recollection.
11	Q. Did he come with Mr. Epstein?	11 Q. Do you have a general recollection?
12	A. I don't know.	12 A. I have a general recollection that
13	Q. Other than that one time that you	13 I have seen him, but I just don't have any
14	say you were at the Virgin Island property	14 other memory of it. I know I met him. I
15	with Mr. Dershowitz, had you ever met	15 just don't recall where or when, except for
16	Mr. Dershowitz in Mr. Epstein's presence?	16 that singular event on the island.
17	MR. PAGLIUCA: This is outside of	17 Q. When you say you have a general
18	the court's order. I will tell you not	18 recollection that you have seen him, do you
19	to answer that question.	19 mean you have a general recollection that you
20	THE WITNESS: Okay.	20 have seen him at Mr. Epstein's properties
21	Q. Did Mr. Dershowitz ever receive a	21 other than the Virgin Islands?
22	massage at any of Mr. Epstein's properties?	22 A. It's just a general recollection,
23	A. I don't recall.	23 but I have no specific memory of seeing him.
24	Q. Did you ever have any conversations	24 Q. All I'm trying to do is find out
25	with Mr. Dershowitz?	25 whether your general recollection is a
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2	MR. PAGLIUCA: You don't have to	2 general recollection of having seen him
3	answer that question. About what,	3 someplace in the world or whether you have a
4	anything?	4 general recollection of having seen him at
5	Q. Did you ever have any conversations	5 Mr. Epstein's properties?
6	with Mr. Dershowitz at Mr. Epstein's	6 A. I'm sorry, I really can't answer.
7	properties?	7 I just don't know. The only memory I have of
8	A. I did, about metal detecting.	8 him is on the island, and I don't have any
9	Q. Anything else?	9 additional memory of him anywhere else.
10	A. I only recall metal detecting.	10 Q. I mentioned a woman by the name of
11	Q. Where did that conversation take	11 [REDACTED] before. Are you familiar with a
12	place?	12 [REDACTED] And I don't mean to imply
13	A. As I was metal detecting.	13 they are the same people.
14	Q. I said where?	14 A. Is this on any of these lists that
15	A. On the island.	15 you gave me?
16	Q. That's the only conversation that	16 Q. It could have been on the first
17	you recall, is that your testimony?	17 list. I don't think so.
18	A. Yes, that is my testimony.	18 A. Is it on this list?
19	Q. Do you recall ever seeing	19 Q. It's not on the second list.
20	Mr. Dershowitz at any of Mr. Epstein's	20 A. So what's your question?
21	residences other than the Virgin Island	21 Q. Are you familiar with a woman named
22	property?	22 [REDACTED]
23	A. That's the only specific memory I	23 A. I'm familiar with the name, yes.
24	have of the conversation that I recall	24 Q. Who is that person?
25	because it was something special.	25 A. I don't recall who she is.

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. What is [REDACTED] connection</p> <p>3 to Mr. Epstein?</p> <p>4 A. I don't know.</p> <p>5 Q. Did you ever speak to [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 A. I don't recall. I know her name,</p> <p>8 and that's all I can -- I don't recall a</p> <p>9 conversation with her. I don't recall who</p> <p>10 she is at this point.</p> <p>11 Q. Was [REDACTED] someone who</p> <p>12 provided massages for Mr. Epstein?</p> <p>13 A. I don't believe so.</p> <p>14 Q. Did [REDACTED] perform any</p> <p>15 services for Mr. Epstein?</p> <p>16 MR. PAGLIUCA: Objection to form</p> <p>17 and foundation.</p> <p>18 A. I have no idea, I'm sorry.</p> <p>19 Q. When did you first become aware of</p> <p>20 charges that Mr. Epstein was having sex with</p> <p>21 a significant number of people at his</p> <p>22 residences?</p> <p>23 MR. PAGLIUCA: You don't have to</p> <p>24 answer that question. It's outside of</p> <p>25 the court's order.</p>	<p>Page 170</p> <p>1 G. Maxwell - Confidential</p> <p>2 [REDACTED]</p> <p>8 A. Are you giving me a timeframe here,</p> <p>9 because it's been a long time. I'm assuming</p> <p>10 he is having sexual relations today. You</p> <p>11 have to bind it to some time.</p> <p>12 Q. You don't know who he is having</p> <p>13 sexual relationships with today, do you?</p> <p>14 A. No.</p> <p>15 Q. So you can only tell me who</p> <p>16 Mr. Epstein was having sexual relationships</p> <p>17 with at a time when you knew about it,</p> <p>18 correct?</p> <p>19 A. I have no knowledge of him actually</p> <p>20 having sex with anybody else outside of what</p> <p>21 we have identified.</p> <p>22 [REDACTED]</p> <p>23 Q. Now, there came a time when you</p> <p>24 learned that people were asserting that he</p> <p>25 had had sexual activities with a lot more</p>
<p>Page 171</p> <p>1 G. Maxwell - Confidential</p> <p>2 Q. You have testified that you were</p> <p>3 only aware of a few people that Mr. Epstein</p> <p>4 had sex with or engaged in sexual activities</p> <p>5 with at his residences, correct?</p> <p>6 MR. PAGLIUCA: Objection to form</p> <p>7 and foundation.</p> <p>8 A. I didn't say that.</p> <p>9 Q. How many people are you aware of</p> <p>10 that Mr. Epstein engaged in sexual activities</p> <p>11 with at his residences?</p> <p>12 A. I'm not aware.</p> <p>13 Q. You are aware of some?</p> <p>14 A. Well, the ones that we've</p> <p>15 discussed, but that's all I'm aware of.</p> <p>16 Q. That's my question.</p> <p>17 A. Then I can concur, yes.</p> <p>18 Q. Let's be clear. You have</p> <p>19 identified three people.</p> <p>20 [REDACTED]</p> <p>[REDACTED]</p>	<p>Page 173</p> <p>1 G. Maxwell - Confidential</p> <p>2 than those three people at his residences,</p> <p>3 correct? During the period of time that you</p> <p>4 were involved with Mr. Epstein, correct?</p> <p>5 A. Like everybody else, like the rest</p> <p>6 of the world, when it was announced in the</p> <p>7 papers.</p> <p>8 Q. Yes.</p> <p>9 And that was during 2005?</p> <p>10 A. Whenever it was.</p> <p>11 Q. At that point, did you do anything</p> <p>12 to try to find out whether those assertions</p> <p>13 were or were not accurate?</p> <p>14 MR. PAGLIUCA: You don't have to</p> <p>15 answer that. That's outside the court's</p> <p>16 order.</p> <p>17 Q. When you heard that there were</p> <p>18 assertions that Mr. Epstein had engaged in</p> <p>19 sexual activities with people who you had met</p> <p>20 at Mr. Epstein's residences, did you do</p> <p>21 anything to determine whether those</p> <p>22 assertions were or were not accurate?</p> <p>23 MR. PAGLIUCA: Objection to form</p> <p>24 and foundation, and you don't have to</p> <p>25 answer that question. It's outside the</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 court's order.</p> <p>3 Q. In terms of preparing for this</p> <p>4 deposition, what documents did you review?</p> <p>5 MR. PAGLIUCA: To the extent I</p> <p>6 provided you with any documents to</p> <p>7 review, I will tell you that's both --</p> <p>8 it's privileged and I instruct you not</p> <p>9 to answer.</p> <p>10 Q. Did your lawyer provide you with</p> <p>11 any documents to review in preparation for</p> <p>12 this deposition that refreshed your</p> <p>13 recollection about any of the events that</p> <p>14 occurred?</p> <p>15 MR. PAGLIUCA: You can answer that</p> <p>16 question.</p> <p>17 A. No.</p> <p>18 Q. How many documents did your lawyer</p> <p>19 provide you with?</p> <p>20 MR. PAGLIUCA: You can answer.</p> <p>21 A. One, I believe.</p> <p>22 Q. One document. Was that a document</p> <p>23 that had been prepared by your attorney, or</p> <p>24 was it a document from the past?</p> <p>25 MR. PAGLIUCA: I will tell you not</p>	<p>1 G. Maxwell - Confidential</p> <p>2 sexual activities with [REDACTED]</p> <p>3 MR. PAGLIUCA: Objection to form</p> <p>4 and foundation.</p> <p>5 A. I didn't have any reason -- I had</p> <p>6 no idea whether they were or weren't.</p> <p>7 Q. Were you with Mr. Epstein in 2005</p> <p>8 when the Palm Beach police launched their</p> <p>9 investigation?</p> <p>10 MR. PAGLIUCA: You don't have to</p> <p>11 answer the question. That's outside the</p> <p>12 court's order.</p> <p>13 Q. When the Palm Beach police launched</p> <p>14 their investigation in 2005, did you make any</p> <p>15 effort to retain records of the women who had</p> <p>16 been present at Mr. Epstein's residences in</p> <p>17 the prior period?</p> <p>18 MR. PAGLIUCA: Don't answer that</p> <p>19 question. It's outside the court's</p> <p>20 order.</p> <p>21 Q. When the Palm Beach police launched</p> <p>22 their investigation in 2005, were you aware</p> <p>23 of any effort to destroy records of women who</p> <p>24 had been present at Mr. Epstein's residences</p> <p>25 in the prior period?</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 to answer that question.</p> <p>3 Q. Was the document that your attorney</p> <p>4 showed you a document that you had ever seen</p> <p>5 before?</p> <p>6 MR. PAGLIUCA: Again, don't answer</p> <p>7 questions about what I showed you or</p> <p>8 didn't show you.</p> <p>9 She already testified that nothing</p> <p>10 refreshed her recollection.</p> <p>11 MR. BOIES: I don't have to accept</p> <p>12 that answer. I can ask these questions,</p> <p>13 and I think these are clearly not</p> <p>14 privileged questions.</p> <p>15 Q. Do you know a [REDACTED]</p> <p>16 A. I do.</p> <p>17 Q. Who is [REDACTED]</p> <p>18 A. She was a friend of Jeffrey's.</p> <p>19 Q. Was [REDACTED] someone with whom</p> <p>20 Mr. Epstein engaged in sexual activities?</p> <p>21 MR. PAGLIUCA: Objection to form</p> <p>22 and foundation.</p> <p>23 A. I don't know.</p> <p>24 Q. Did you ever have any reason to</p> <p>25 believe that Mr. Epstein was engaged in</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Don't answer that</p> <p>3 question. It's outside the court's</p> <p>4 order.</p> <p>5 Q. In 2005, were you aware of any</p> <p>6 effort to destroy records of messages you had</p> <p>7 taken of women who had called Mr. Epstein in</p> <p>8 the prior period?</p> <p>9 MR. PAGLIUCA: Don't answer that</p> <p>10 question. It's outside the court's</p> <p>11 order.</p> <p>12 MR. BOIES: I said I would give you</p> <p>13 a break every hour. It's been an hour.</p> <p>14 MR. PAGLIUCA: Do you want a break</p> <p>15 or do you want to keep going?</p> <p>16 THE WITNESS: Keep going.</p> <p>17 MR. BOIES: What I told you before,</p> <p>18 you asked for a break every hour. I am</p> <p>19 happy to give you a break at a fixed</p> <p>20 time. What I'm not happy to do is</p> <p>21 interrupt a chain of examination.</p> <p>22 So if you want a break now, we will</p> <p>23 take a break now. If you don't want a</p> <p>24 break now, we will not break for another</p> <p>25 hour.</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Is there a rule that</p> <p>3 you can point me to that mandates that</p> <p>4 you get to control the time and place of</p> <p>5 breaks?</p> <p>6 MR. BOIES: No. We will take a</p> <p>7 break now, because if what you are going</p> <p>8 to do is say, you said at the very</p> <p>9 beginning of this thing that you wanted</p> <p>10 to have a rule that every hour we took a</p> <p>11 break, and I said that was fine with me,</p> <p>12 but I just didn't want you taking a</p> <p>13 break, particularly since you reserve</p> <p>14 the right to talk to your client during</p> <p>15 breaks, in the middle of an examination.</p> <p>16 Now you are saying let's continue</p> <p>17 for a while but I am not agreeing to</p> <p>18 continue for the next hour. We will</p> <p>19 take a break, and we will come back and</p> <p>20 we will go from there.</p> <p>21 MR. PAGLIUCA: We will take a break</p> <p>22 at your request now, and then if I want</p> <p>23 to take a break, we will take another</p> <p>24 break.</p> <p>25 MR. BOIES: If you take a break to</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. I would like to go down those names</p> <p>3 and see if any of those people are people</p> <p>4 that you recognize. However you think is</p> <p>5 best, we can go name by name, or you can tell</p> <p>6 me which ones you recognize and which ones</p> <p>7 you don't.</p> <p>8 A. I recognize [REDACTED]. I recognize</p> <p>9 [REDACTED]. These are</p> <p>10 names that ring bells, nothing else.</p> <p>11 [REDACTED] I recognize the name.</p> <p>12 Q. Where is [REDACTED]</p> <p>13 A. [REDACTED]. I just recognize</p> <p>14 these names. It doesn't mean anything else.</p> <p>15 I'm just recognizing names.</p> <p>16 [REDACTED].</p> <p>17 Let me do it again and make sure I</p> <p>18 didn't miss anyone. That's it.</p> <p>19 Q. Now, with respect to the people</p> <p>20 that you say you recognized the names of,</p> <p>21 [REDACTED], were</p> <p>22 any of those people, people who provided</p> <p>23 massages to Mr. Epstein?</p> <p>24 MR. PAGLIUCA: Objection to form</p>
<p>1 G. Maxwell - Confidential</p> <p>2 talk to your witness, I guarantee you</p> <p>3 there will be a motion for sanctions. I</p> <p>4 think what you're doing with this</p> <p>5 witness is inappropriate. I think your</p> <p>6 instructions not to answer,</p> <p>7 conversations that you had with her</p> <p>8 while she is under oath and under</p> <p>9 examination is inappropriate.</p> <p>10 THE VIDEOGRAPHER: It's 2:18 p.m.,</p> <p>11 and we are off the record.</p> <p>12 (Recess.)</p> <p>13 THE VIDEOGRAPHER: The time is 2:28</p> <p>14 p.m. This also begins DVD No. 6.</p> <p>15 BY MR. BOIES:</p> <p>16 Q. Let me hand you a document that has</p> <p>17 been previously marked as Maxwell Exhibit 13.</p> <p>18 And I would like you to turn to page 91 of</p> <p>19 that exhibit. And you see the heading that</p> <p>20 says, "Massage-Florida"?</p> <p>21 A. Actually, I don't -- yes, I do,</p> <p>22 sorry.</p> <p>23 Q. Then you see a list of telephone</p> <p>24 numbers with names?</p> <p>25 A. I do.</p>	<p>1 G. Maxwell - Confidential</p> <p>2 and foundation.</p> <p>3 A. Sorry, I guess. I believe [REDACTED]</p> <p>4 did, and I believe -- I think that's it that</p> <p>5 I know of, I think.</p> <p>6 Q. Now, just going down the names of</p> <p>7 people that you did not recognize, I take it</p> <p>8 you are not aware or recognize the name [REDACTED]</p> <p>9 first name?</p> <p>10 A. It was just a first name. I can't</p> <p>11 think of a [REDACTED] at this point.</p> <p>12 Q. The same thing is true for [REDACTED]</p> <p>13 A. I don't recognize [REDACTED].</p> <p>14 Q. And [REDACTED]</p> <p>15 A. I don't recognize [REDACTED].</p> <p>16 Q. And [REDACTED]</p> <p>17 A. Is that [REDACTED] Where is that?</p> <p>18 That's [REDACTED], I'm sorry, I missed her.</p> <p>19 That would probably be [REDACTED].</p> <p>20 I think [REDACTED] might have been a</p> <p>21 masseuse as well. There is a [REDACTED] in the</p> <p>22 back of my head.</p> <p>23 Q. [REDACTED]</p> <p>24 A. I don't know who that is.</p> <p>25 Q. What about [REDACTED]</p>

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<p>1 G. Maxwell - Confidential  2 A. No.  3 Q. What about [REDACTED]  4 A. No.  5 Q. [REDACTED]  6 A. No.  7 Q. [REDACTED]  8 A. I didn't think I know a [REDACTED]  9 period.  10 Q. [REDACTED]  11 A. No.  12 Q. Is that Virginie?  13 A. I don't know what that is.  14 Q. Then there is a [REDACTED] or [REDACTED]  15 Do you see that?  16 A. I don't see that.  17 Q. It's right after Virginia, which is  18 right after [REDACTED]  19 A. I see it. I don't know who that  20 is.  21 Q. How about [REDACTED]  22 A. No idea.  23 Q. There is someone here [REDACTED], and  24 described as a redhead?  25 A. I don't know who that is.</p>	<p>Page 182</p> <p>1 G. Maxwell - Confidential  2 Q. Next one is [REDACTED] --  3 A. [REDACTED] is Virginia's guy that you  4 asked me about. I don't know [REDACTED].  5 Q. I asked you about a [REDACTED].  6 A. Right, I don't know him, so I'm  7 guessing, I don't know him.  8 Q. [REDACTED]  9 A. No.  10 Q. [REDACTED]  11 A. No.  12 Q. [REDACTED]  13 A. I don't know who these people are.  14 Q. Was there a list that was kept of  15 women or girls who provided massages?  16 MR. PAGLIUCA: This has been  17 previously deposed on. This is not part  18 of the court's order, I will tell her  19 not to answer.  20 MR. BOIES: You are going to tell  21 her not to answer a question that says  22 was there a list of women or girls who  23 provided massages?  24 MR. PAGLIUCA: She has been  25 previously deposed on this subject.</p>
<p>Page 183</p> <p>1 G. Maxwell - Confidential  2 Q. [REDACTED]  3 A. No.  4 Q. And there is a [REDACTED]  5 A. I don't know.  6 Q. [REDACTED]  7 A. No idea.  8 Q. Then there is [REDACTED]  9 A. That's a name that keeps coming up.  10 I recognize the name, but I don't know her in  11 particular.  12 Q. What about [REDACTED]  13 A. I have no idea who that is.  14 Q. [REDACTED]  15 A. No idea.  16 Q. Somebody that's listed as  17 [REDACTED], Virginia's friend?  18 A. No.  19 Q. [REDACTED], do you know who that  20 is?  21 A. No.  22 Q. How about [REDACTED] friend?  23 A. No.  24 Q. Do you know who [REDACTED] is?  25 A. No.</p>	<p>Page 185</p> <p>1 G. Maxwell - Confidential  2 MR. BOIES: I think this is  3 squarely in the court's order, but if  4 you instruct her not to answer, you  5 instruct her not to answer.  6 MR. PAGLIUCA: We'll find out.  7 BY MR. BOIES:  8 Q. I take it you don't know the ages  9 of any of these people?  10 A. The ones that I did recognize were  11 roughly my age. The ones I don't know, I  12 wouldn't have a clue.  13 Q. Did you, or insofar as you are  14 aware anyone, maintain a list of females that  15 provided massage services to Mr. Epstein at  16 his residences?  17 MR. PAGLIUCA: Objection to form  18 and foundation.  19 You can answer if you can.  20 A. I don't know anything about a list.  21 Q. Let me go back to Exhibit 28. I  22 want to go down this list, excluding  23 Mr. Epstein himself, and just ask you a  24 series of the same essential questions about  25 each one.</p>

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1 G. Maxwell - Confidential  
 2 [REDACTED], which of Mr. Epstein's  
 3 residences did you see [REDACTED] at?  
 4 A. I don't have a memory of [REDACTED]  
 5 where I would have seen her.  
 6 Q. Did you see her at some residence  
 7 or property?  
 8 A. I did.  
 9 Q. Of Mr. Epstein?  
 10 A. I did.  
 11 Q. You just can't remember which ones,  
 12 is that fair?  
 13 A. Yes, that's fair.  
 14 Q. [REDACTED], which residences of  
 15 Mr. Epstein did you see [REDACTED] at?  
 16 A. I don't actually recall meeting  
 17 [REDACTED], so I can't recall.  
 18 Q. So [REDACTED] may be somebody  
 19 who you never met, is that your testimony?  
 20 A. No, I'm not saying that. I just  
 21 don't recall her really at all. I'm sorry, I  
 22 don't recall.  
 23 Q. Did you see [REDACTED] at some  
 24 residence or property of Mr. Epstein?  
 25 A. I don't recall.

1 G. Maxwell - Confidential  
 2 not to answer these questions anymore.  
 3 These do not appear -- I let this go on,  
 4 they don't appear to be tied to the  
 5 court's order as relating to sex or  
 6 massages or anything that's contained in  
 7 the order. This is just simply what was  
 8 somebody doing at some property at some  
 9 point in time. So don't answer these  
 10 questions.  
 11 Q. It is your assertion that, leaving  
 12 Mr. Epstein aside, none of the people on this  
 13 list engaged in sexual activities with either  
 14 you or Mr. Epstein, correct?  
 15 MR. PAGLIUCA: Objection to form  
 16 and foundation.  
 17 A. I can only testify to myself. I  
 18 cannot testify to Mr. Epstein.  
 19 Q. With respect to Mr. Epstein, do you  
 20 know, one way or another, whether any of  
 21 these people engaged in sexual activities?  
 22 A. With respect to Mr. Epstein, how  
 23 would I know that?  
 24 Q. The answer is lots of ways, but all  
 25 I can do is ask you whether you know it or

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1 G. Maxwell - Confidential  
 2 Q. [REDACTED], what properties of  
 3 Mr. Epstein did you see [REDACTED] at?  
 4 A. Palm Beach, and I believe New  
 5 Mexico and New York.  
 6 Q. And [REDACTED]  
 7 A. Palm Beach, I believe.  
 8 Q. And what was [REDACTED] doing at  
 9 Palm Beach when you saw her?  
 10 A. If I remember correctly, she was a  
 11 real estate broker.  
 12 Q. Did you see [REDACTED] at  
 13 Mr. Epstein's Virgin Island property?  
 14 A. I don't recall.  
 15 Q. When you saw [REDACTED] in Palm  
 16 Beach and New Mexico and New York, what was  
 17 she doing?  
 18 A. I don't know.  
 19 Q. Do you know why she was there?  
 20 A. I think she was just a friend.  
 21 Q. A friend of Mr. Epstein's?  
 22 A. Yeah.  
 23 Q. [REDACTED], what Epstein  
 24 properties did you see her at?  
 25 MR. PAGLIUCA: I will now tell you

1 G. Maxwell - Confidential  
 2 not.  
 3 A. I don't.  
 4 Q. Do you have any reason to believe  
 5 -- because I don't want to get stuck on your  
 6 concept of personal knowledge -- do you have  
 7 any reason to believe that any of the people  
 8 on this list had sexual activities with  
 9 Mr. Epstein?  
 10 A. I do not.  
 11 Q. Do you have any reason to believe  
 12 that any of these people had massages at any  
 13 Epstein property?  
 14 A. I have no idea. It's entirely  
 15 possible, but I have no idea.  
 16 Q. Do you have any reason to believe  
 17 that any of the people on this list, other  
 18 than Mr. Epstein himself, engaged in sexual  
 19 activities with anyone on Mr. Epstein's  
 20 properties?  
 21 A. I have no reason to believe that.  
 22 Q. Let me go to the Dubin residence.  
 23 I asked you some questions about the Dubin  
 24 residence earlier and about a possible visit  
 25 to that residence of a [REDACTED]. Do you

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<p>1 G. Maxwell - Confidential</p> <p>2 recall that subject generally?</p> <p>3 A. I recall you asking me a question</p> <p>4 about it, yes, I do.</p> <p>5 Q. Let me ask about another time at</p> <p>6 the Dubin residence. Were you ever at the</p> <p>7 Dubin residence with people who worked at the</p> <p>8 Epstein residence?</p> <p>9 MR. PAGLIUCA: Objection to form</p> <p>10 and foundation.</p> <p>11 A. No.</p> <p>12 Q. Were you ever at the Dubin</p> <p>13 residence when there were a number of females</p> <p>14 under the age of 21 dancing?</p> <p>15 A. Excuse me?</p> <p>16 Q. Were you ever at the Dubin</p> <p>17 residence when there were a number of females</p> <p>18 under the age of 21 dancing?</p> <p>19 A. The only people I have seen dancing</p> <p>20 at any Dubin residence are [REDACTED]</p> <p>21 Q. Just those [REDACTED], no other</p> <p>22 [REDACTED]?</p> <p>23 A. No other [REDACTED]</p> <p>24 Q. Were you ever at the Dubin</p> <p>25 residence when females who you had seen at</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: I want to make a</p> <p>3 record here before we are done. I do</p> <p>4 get a chance to speak. Are we going off</p> <p>5 the record now?</p> <p>6 MR. BOIES: You want to talk on the</p> <p>7 record?</p> <p>8 MR. PAGLIUCA: Yes, is that okay</p> <p>9 with you?</p> <p>10 MR. BOIES: You want to ask her</p> <p>11 questions?</p> <p>12 MR. PAGLIUCA: No. I want to make</p> <p>13 a record of your closing of the</p> <p>14 deposition.</p> <p>15 MR. BOIES: I don't know how you</p> <p>16 can make a record of my closing the</p> <p>17 deposition, but if you want to take up</p> <p>18 the time and the transcript space to</p> <p>19 talk as opposed to writing a letter or</p> <p>20 filing a motion, go for it.</p> <p>21 MR. PAGLIUCA: To the extent you</p> <p>22 have questions that are within the</p> <p>23 court's order that you haven't asked,</p> <p>24 that I haven't objected to, meaning no</p> <p>25 other questions, this deposition is</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 the residences of Mr. Epstein, leaving aside</p> <p>3 [REDACTED] were present and dancing?</p> <p>4 A. Can you ask me the question again?</p> <p>5 Q. Sure. I'm focusing on the Dubin</p> <p>6 residence, and I'm focusing on children other</p> <p>7 than [REDACTED]</p> <p>8 A. I'm there.</p> <p>9 Q. I'm asking whether you were ever at</p> <p>10 the Dubin residence where there were females</p> <p>11 other than [REDACTED] who were</p> <p>12 dancing.</p> <p>13 A. I've never witnessed --</p> <p>14 MR. PAGLIUCA: Objection to form</p> <p>15 and foundation.</p> <p>16 A. Other than [REDACTED], who I have</p> <p>17 certainly seen dancing, I don't recall any</p> <p>18 dancing at Eva and Glenn's residences by any</p> <p>19 other people.</p> <p>20 MR. BOIES: I think pending</p> <p>21 resolution of the instructions not to</p> <p>22 answer, I don't have any further</p> <p>23 questions at this time. If you give me</p> <p>24 a minute, just to check.</p> <p>25 Thank you very much.</p>	<p>1 G. Maxwell - Confidential</p> <p>2 closed.</p> <p>3 If there are questions that I have</p> <p>4 instructed the witness not to answer and</p> <p>5 it later turns out the judge disagrees</p> <p>6 with my characterization, we will be</p> <p>7 back to revisit it, but we are done as</p> <p>8 far as I'm concerned.</p> <p>9 MR. BOIES: The deposition is not</p> <p>10 closed. There are a number of</p> <p>11 instructions not to answer. I think it</p> <p>12 is a fair point that if the court were</p> <p>13 to conclude that none of the questions</p> <p>14 that have been instructed need to be</p> <p>15 answered, we're not going to be</p> <p>16 continuing the deposition, barring some</p> <p>17 additional information coming to light.</p> <p>18 MR. PAGLIUCA: I think we agree</p> <p>19 then.</p> <p>20 THE VIDEOGRAPHER: The time is 2:51</p> <p>21 p.m., and we are going off the record.</p> <p>22 (Time noted: 2:51 p.m.)</p>

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1			1	
2	---		2	---
3	INDEX		3	Questions Marked
4	---		4	Page Line Page Line Page Line
5			5	None
6	GHISLAINE MAXWELL	PAGE	6	---
7	By Mr. Boies	4	7	
8			8	
9	---		9	
10	EXHIBITS		10	
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12	EXHIBIT	PAGE	12	
13	Exhibit 26 List of names	23	13	
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16			16	
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1			1	
2	---		2	
3	DEPOSITION SUPPORT INDEX		3	
4	---		4	
5	Direction to Witness Not to Answer		5	I HEREBY CERTIFY that GHISLAINE
6	Page Line Page Line Page Line		6	MAXWELL, was duly sworn by me and that the
7	50 22 50 25 51 5		7	deposition is a true record of the testimony
8	51 9 51 17 51 22		8	given by the witness.
9	52 2 81 17 82 6		9	
10	82 25 83 7 94 21		10	
11	95 6 98 12 118 11		11	Leslie Fagin,
12	142 6 142 13 165 16		12	Registered Professional Reporter
13	165 25 169 22 172 13		13	Dated: July 22, 2016
14	172 22 173 4 173 24		14	
15	174 5 175 9 175 17		15	(The foregoing certification of
16	175 25 176 8 183 14		16	this transcript does not apply to any
17	186 23		17	reproduction of the same by any means, unless
18	---		18	under the direct control and/or supervision
19	Request for Production of Documents		19	of the certifying reporter.)
20	Page Line Page Line Page Line		20	
21	None		21	
22	---		22	
23	Stipulations		23	
24	Page Line Page Line Page Line		24	
25	None		25	

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1  
2       ACKNOWLEDGMENT OF DEPONENT  
3  
45       I,                   , do hereby  
6 certify that I have read the foregoing pages,  
7 and that the same is a correct transcription  
8 of the answers given by me to the questions  
9 therein propounded, except for the  
10 corrections or changes in form or substance,  
11 if any, noted in the attached Errata Sheet.  
12  
13  
14  
1516      GHISLAINE MAXWELL           DATE  
17  
18  
1920      Subscribed and sworn  
21      to before me this  
22      day of                   , 2016.

23      My commission expires:

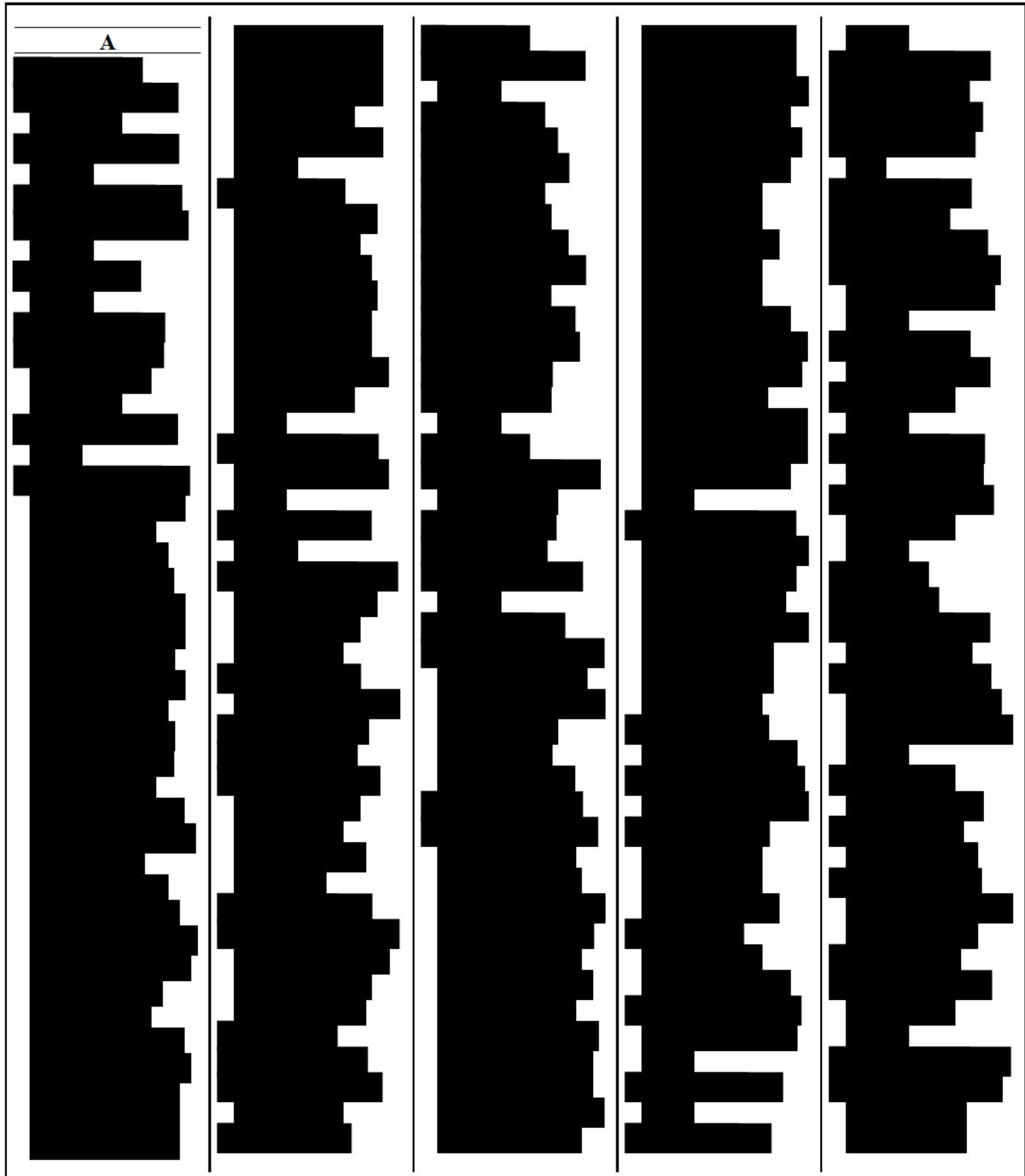
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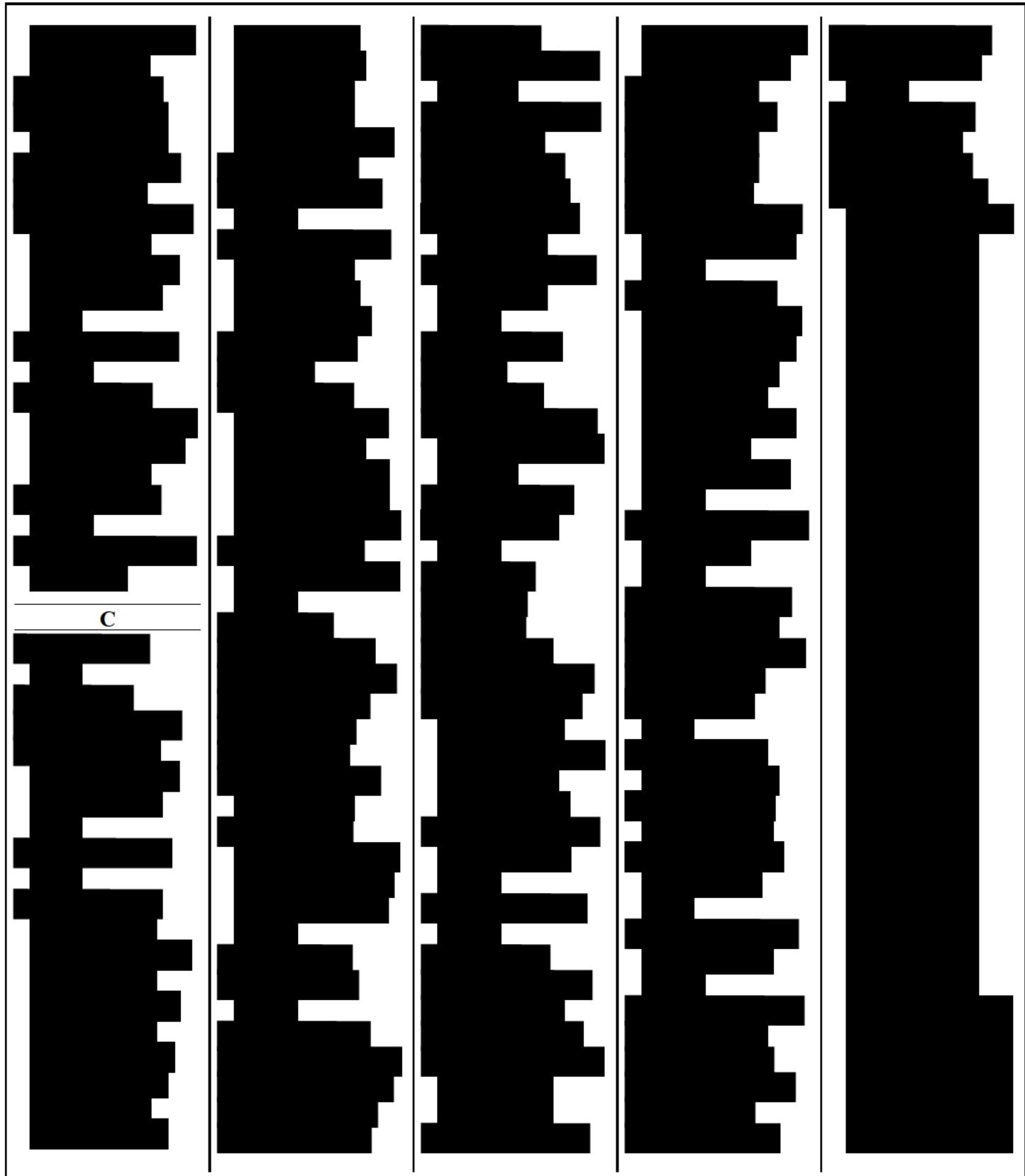
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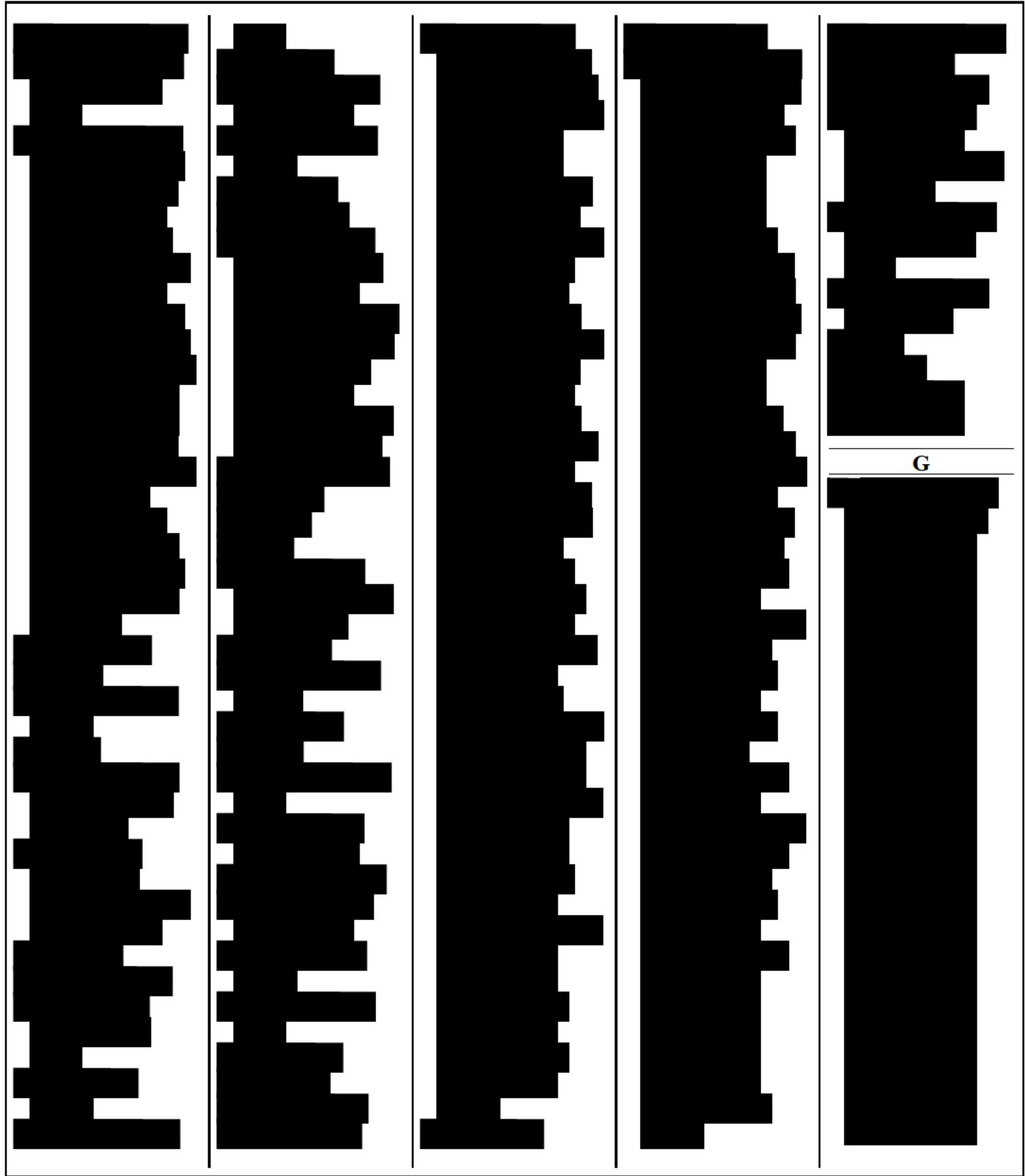
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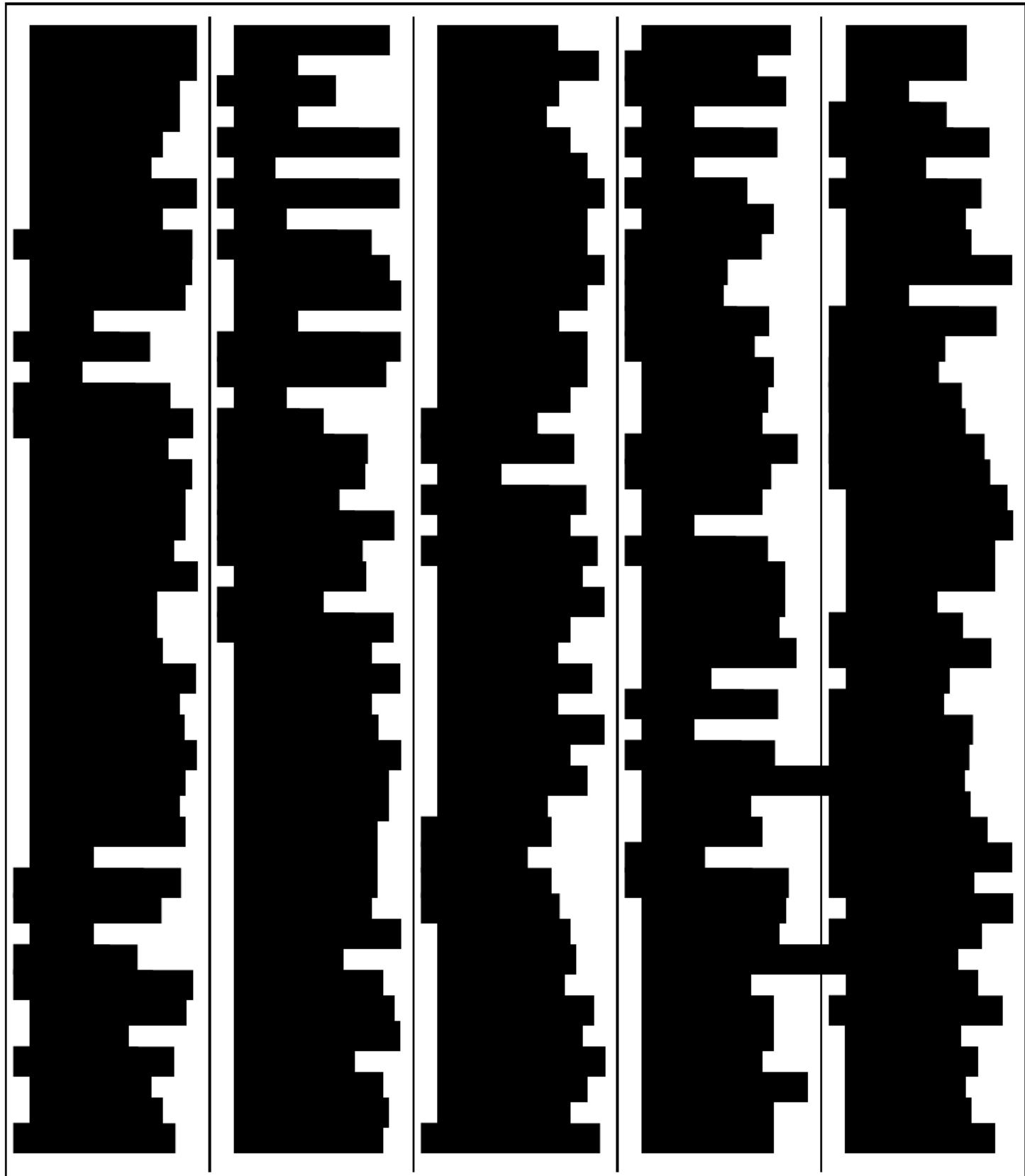
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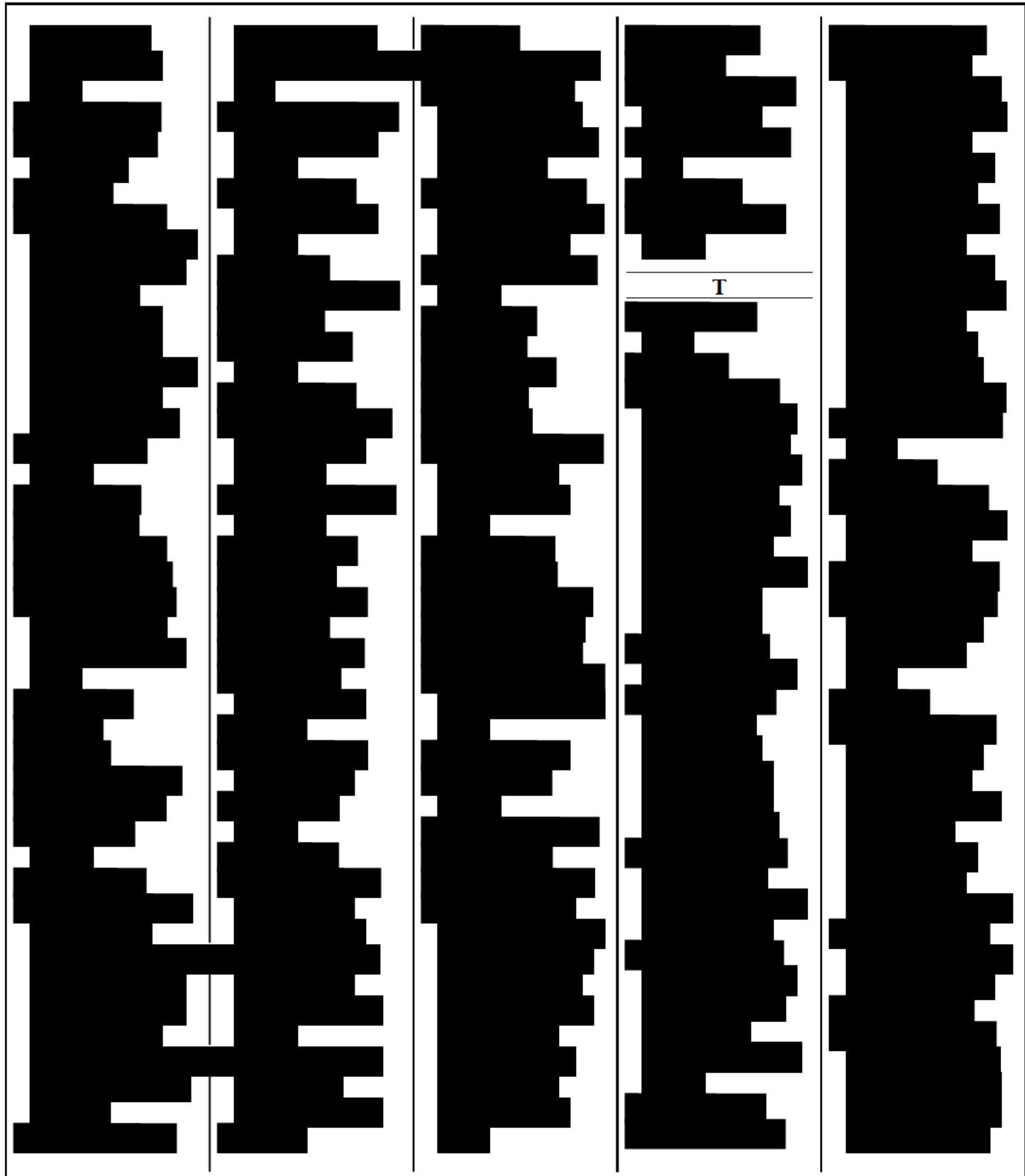
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