

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

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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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 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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1 G. Maxwell - Confidential
2
31 G. Maxwell - Confidential
222 MR. PAGLIUCA: Object to the form
23 and foundation.
24 MR. BOIES: Excuse me, counsel.
25 MR. PAGLIUCA: I'm objecting to

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2
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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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36 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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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.

1 G. Maxwell - Confidential
 2

23 Q. Were you ever on a plane with
 24 Mr. Epstein when Mr. Epstein had sex with
 25 anyone?

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 2

1 G. Maxwell - Confidential
 2 MR. PAGLIUCA: Object to the form
 3 and foundation.
 4 A. How would I know?
 5 Q. Were you ever on a plane with
 6 Mr. Epstein when, to your knowledge,
 7 Mr. Epstein had sex with anyone?
 8 A. Can you repeat the question?
 9 Q. Were you ever on a plane with
 10 Mr. Epstein when, to your knowledge,
 11 Mr. Epstein had sex with anyone?
 12 A. Not that I can recall.
 13 Q. Were you ever on a plane with
 14 Mr. Epstein when you saw Mr. Epstein having
 15 sex with anyone?
 16 A. Never.
 17 Q. I want to be sure that the question
 18 and answer is meeting. When you refer to
 19 having sex with someone, what are you
 20 referring to?
 21 MR. PAGLIUCA: Object to the form
 22 and foundation.
 23 A. Intercourse.
 24 Q. And when you refer to intercourse,
 25 what do you refer to?

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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. [REDACTED]

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 2 [REDACTED]

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 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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2 had oral sex with anyone [REDACTED]

3 A. No.

4 [REDACTED]

[REDACTED]

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2 court case on this list, one other person.

3 Q. Which one is that?

4 A. Haley Robson, because she has been
5 on the court papers.

6 Q. Haley who?

7 A. Robson.

8 The only two I know is [REDACTED] and
9 Virginia, and one other name I recognize.10 Q. So just to be clear, the only two
11 people listed on Maxwell Deposition Exhibit
12 26 that you know are [REDACTED]

13 A. And Virginia Roberts, yes.

14 Q. And the only other person on --

15 A. I don't know her, I recognize her
16 name.17 Q. -- whose name you recognize is
18 Haley Robson, but you don't know her, never
19 met her?

20 A. I don't recall ever meeting her.

21 Q. Other than what you know from her
22 participation in this case, you don't know
23 anything about her, is that your testimony?24 A. I don't even know -- I don't even
25 recognize what her participation is in this

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2 [REDACTED]

3 [REDACTED].

4 MR. BOIES: I will show you a
5 document we have marked for
6 identification as Maxwell Deposition
7 Exhibit 26.8 (Maxwell Exhibit 26, List of names,
9 marked for identification, as of this
10 date.)11 Q. I would like you to go down this
12 list and tell me which names, if any, you
13 recognize on this list.14 A. Just in the way the list runs in
15 order, I recognize the names -- by recognize,
16 only stating that I know the name, I'm not
17 making any representations about these
18 people.19 Q. I understand that, and I will come
20 back and ask you, but if you don't recognize
21 the name...22 A. [REDACTED]. Virginia Roberts.
23 And that's it on this list. Let me just
24 double-check. I recognize the name, not
25 because I know her, but just because of the1 G. Maxwell - Confidential
2 case. I just know I recognize her name, and
3 I can't recall right now what her involvement
4 is, but I recognize the name.5 Q. Other than whatever her involvement
6 in this case may be or may not be?

7 A. Correct.

8 Q. Is it fair to say it is your
9 testimony that except for that, you have no
10 knowledge about her at all?

11 A. Correct.

12 Q. And other than [REDACTED],
13 Virginia Roberts and Haley Robson, you don't
14 know anything at all about any of the other
15 people listed here, is that your testimony?16 A. I don't even know who they are.
17 You could put any names in front of me, I
18 wouldn't recognize them, I don't know them, I
19 don't even recognize the names.20 Q. I think this is clear from your
21 last answer, but I want to be sure. It is
22 your testimony that other than [REDACTED]
23 and Virginia Roberts, you never met any of
24 these people at any homes of Mr. Epstein, is
25 that your testimony?

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1 G. Maxwell - Confidential
 2 MR. PAGLIUCA: Object to the form
 3 and foundation.
 4 A. I don't even know who they are, so
 5 I wouldn't -- I have no clue who they are, I
 6 don't know where they are, I don't know where
 7 they come from, I don't recognize -- I only
 8 pointed out Haley Robson because I recognize
 9 the name from various documents I read. I
 10 don't have any knowledge of any other person
 11 on this list. I don't believe I've ever even
 12 seen these names. I don't know who they are
 13 at all.

14 I would not be able to identify a
 15 single name on this list other than those
 16 three that I have indicated to you.

17 [REDACTED]

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 2 a massage at his home in New York, regardless
 3 of where in the home it was?
 4 A. No.
 5 Q. Have you ever seen anyone give
 6 Mr. Epstein a massage at his home in Palm
 7 Beach?
 8 A. I have.
 9 Q. Have you ever seen anyone give
 10 Mr. Epstein a massage in New Mexico?
 11 A. No, I can't recall.
 12 Q. Have you ever seen anyone give
 13 Mr. Epstein a massage in the Virgin Islands?
 14 A. I have.
 15 Q. Have you ever seen anyone give
 16 Mr. Epstein a massage in Paris?
 17 A. No, I don't recall seeing that.
 18 Q. Have you ever seen anyone give
 19 Mr. Epstein a massage on an airplane?
 20 A. No.
 21 Q. Have you ever seen anyone give
 22 Mr. Epstein a massage anywhere other than his
 23 home in Palm Beach or in the Virgin Islands?
 24 A. I'm sorry, can you just repeat the
 25 question?

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 2 [REDACTED]

5 Q. Did you provide massages to
 6 Mr. Epstein?

7 A. No.

8 Q. What?

9 A. No.

10 Q. Were you ever present when anyone
 11 provided a massage to Mr. Epstein?

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

14 A. I have seen people give Mr. Epstein
 15 massages. I have seen him on a massage
 16 table. I have seen that.

17 Q. Have you seen someone other than
 18 yourself give Mr. Epstein a massage at his
 19 home in New York?

20 A. I can't recall seeing him in the
 21 massage room in New York, no.

22 Q. I'm not asking whether you recall
 23 seeing him in the massage room in New York.
 24 I'm asking you whether you have ever seen
 25 someone other than yourself give Mr. Epstein

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1 G. Maxwell - Confidential
 2 Q. Have you ever seen anyone give
 3 Mr. Epstein a massage anywhere other than in
 4 his home in Palm Beach or in the Virgin
 5 Islands?
 6 A. No, I can't think of anyplace.
 7 Q. Have you ever seen anyone give
 8 Mr. Epstein a massage when Mr. Epstein was
 9 not clothed?
 10 A. Sorry, can you repeat the question?
 11 Q. Have you ever seen anyone give
 12 Mr. Epstein a massage when Mr. Epstein was
 13 not clothed?
 14 A. I think when Mr. Epstein received
 15 massages, he never had clothes on.
 16 Q. Who did you see give Mr. Epstein a
 17 massage?
 18 A. I can't recall the "whos" because I
 19 don't really remember, but I have seen him
 20 receive massages from professional adult
 21 masseuses that I have seen him receive
 22 massages.
 23 Q. When you say professional adult
 24 masseuses, what are you referring to?
 25 A. I just want to be sure that we

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<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>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>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>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 2 masseuse as far as I can recall today, so 3 that would have made her, I thought that 4 would have made her, to work in a spa, I 5 didn't think about, and I, I thought she 6 appeared to be a professional masseuse. 7 Q. Remember questions a while ago 8 where you made a big point about people being 9 adult masseuses? 10 A. Right, yeah. 11 Q. When you met Virginia for the first 12 time -- 13 A. Right. 14 Q. -- did you think she was an adult 15 masseuse, as you use that term? 16 A. I don't recall actually meeting 17 Virginia at the time, and in fact, were it 18 not for this case, I'm not sure I would 19 recall her at all. 20 Q. But you do recall knowing Virginia? 21 A. I do, yes. 22 Q. You do recall knowing that Virginia 23 was giving Mr. Epstein massages, correct? 24 MR. PAGLIUCA: Object to the form 25 and foundation.</p>	<p>1 G. Maxwell - Confidential 2 thought. I really don't recall her, so it's 3 hard for me to testify what I thought about 4 her age at the time. 5 Q. Was Virginia, in the period of 6 around 2000, the youngest person that, as you 7 understood it, was giving Mr. Epstein 8 massages? 9 MR. PAGLIUCA: Object to the form 10 and foundation. 11 A. Again, I can't testify to her age, 12 but everybody else that I can recall seemed 13 to be again, like I would say, adults. 14 Q. You didn't think Virginia was an 15 adult, did you? 16 MR. PAGLIUCA: Object to the form 17 and foundation. 18 A. Like I said, I don't recall her. I 19 don't recall thinking about -- my memory is 20 of adults giving Jeffrey massages, and as I 21 don't really remember Virginia around that 22 time, I don't know what I think. 23 Q. You do remember Virginia, about 24 that time back in the 2000s, giving 25 Mr. Epstein massages?</p>
<p>Page 43</p> <p>1 G. Maxwell - Confidential 2 A. I believe she was, but I can't say 3 for sure. 4 Q. Why do you believe Virginia was 5 giving Mr. Epstein massages? 6 A. Today, because -- but back then. 7 Q. Back then? 8 A. Because at some point she would 9 have been going to the massage room to give 10 massages. 11 Q. Back then, in the period around 12 2000? 13 A. Right. 14 Q. You believed that Virginia was 15 giving Mr. Epstein massages, correct? 16 A. I believe I did, yes. 17 Q. At the time back in the period 18 around 2000 that you believe that Virginia 19 was giving Mr. Epstein massages, how old did 20 you think Virginia was at the time? 21 MR. PAGLIUCA: Object to the form 22 and foundation. 23 A. I don't believe that I -- I don't 24 know what I thought at the time. It's a long 25 time ago and I just have no idea what I</p>	<p>Page 45</p> <p>1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Object to the form 3 and foundation. 4 A. I barely remember her at all. 5 Q. Whether you barely remember her or 6 not, you do remember that back in the period 7 around 2000, Virginia was giving Mr. Epstein 8 massages, right? 9 MR. PAGLIUCA: Objection to form 10 and foundation. 11 A. Only in the most general terms. It 12 would be somebody who would give him a 13 massage, and that's it. 14 Q. During the period of time back in 15 the period around 2000, when you knew that 16 Virginia was somebody who would give 17 Mr. Epstein a massage, was she somebody who 18 you considered an adult? 19 MR. PAGLIUCA: Objection to form 20 and foundation. 21 A. I didn't consider her at all 22 because she is not somebody that I really 23 interacted with. 24 Q. It is your testimony that Virginia 25 was not somebody that you interacted with, is</p>

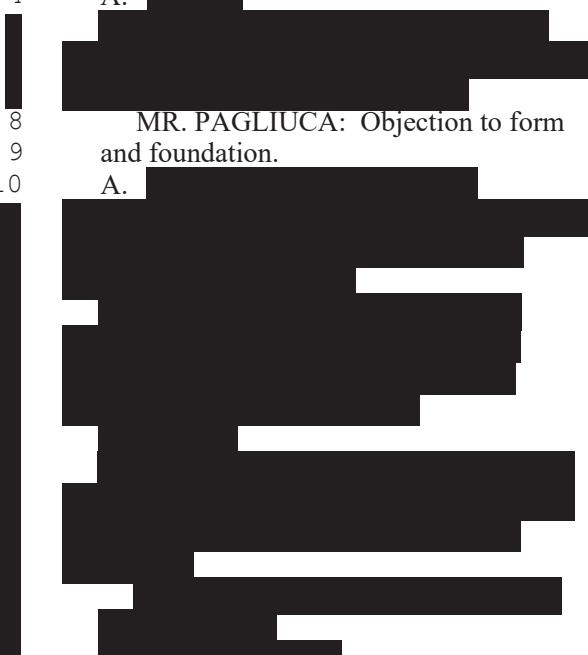
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<p>1 G. Maxwell - Confidential 2 that what you're saying? 3 A. I said I didn't really interact -- 4 it's not that I didn't interact with her at 5 all, but not enough for her to make a very 6 strong and lasting impression. 7 Q. Is it your testimony 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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<p style="text-align: right;">Page 50</p> <p>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</p>	<p style="text-align: right;">Page 52</p> <p>1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Don't answer that 3 question. 4 Q. Did you have conversations with 5 anyone other than your lawyer during the 6 break? 7 A. No. 8 Q. Did your lawyer tell you why he had 9 taken a break? 10 MR. PAGLIUCA: Don't answer that 11 question. 12 I don't think I did, by the way. 13 MR. BOIES: I'm happy to depose you 14 about it, if you want. 15 MR. PAGLIUCA: Sure. 16 MR. BOIES: I'm serious about that. 17 I'm happy to put you under oath right 18 now, and if you want to start talking 19 about what you did or did not do, I'm 20 happy to interrupt this deposition, put 21 you under oath and let you testify. 22 MR. PAGLIUCA: Ask a question. 23 MR. BOIES: I'm telling you. 24 Otherwise, I suggest you stop making 25 speeches.</p>
<p style="text-align: right;">Page 51</p> <p>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?</p>	<p style="text-align: right;">Page 53</p> <p>1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Why don't we both 3 stop making speeches. 4 BY MR. BOIES: 5 [REDACTED]</p>

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1 2	G. Maxwell - Confidential 	1 2 
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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 A. 

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2

21 MR. PAGLIUCA: Objection to form
22 and foundation.
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2 [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

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2 [REDACTED]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 Tony Figueroa? 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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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. I have no idea.</p> <p>5 Q. Do you know Joanna Sieberg,</p> <p>6 S-I-E-B-E-R-G?</p> <p>7 A. No.</p> <p>8 MR. PAGLIUCA: Showberg (sic)?</p> <p>9 MR. BOIES: Yes.</p> <p>10 MR. PAGLIUCA: You said Sieberg.</p> <p>11 A. I do know Johanna Sieberg.</p> <p>12 Q. Did Joanna ever give Mr. Epstein a</p> <p>13 massage?</p> <p>14 A. I believe she did.</p> <p>15 Q. Did she ever give you a massage?</p> <p>16 A. She did.</p> <p>17 Q. Was she what you referred to as a</p> <p>18 professional masseuse?</p> <p>19 A. I would.</p> <p>20 Q. Had she ever worked in a spa?</p> <p>21 A. I don't know if she worked in a</p> <p>22 spa.</p> <p>23 Q. Had she ever, prior to giving you</p> <p>24 and Mr. Epstein massages, had she ever given</p> <p>25 massages to other people?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. Where did she go to massage school?</p> <p>3 A. I don't know.</p> <p>4 Q. When did she go to massage school?</p> <p>5 A. I don't know.</p> <p>6 Q. Did she tell you she went to</p> <p>7 massage school?</p> <p>8 A. I don't recall.</p> <p>9 Q. Did someone else tell you she went</p> <p>10 to massage school?</p> <p>11 A. I don't recall. It's my belief she</p> <p>12 went to massage school and became a</p> <p>13 professional masseuse at some point.</p> <p>14 Q. What is your belief based on?</p> <p>15 A. I don't know why, it's just</p> <p>16 something, I must have had a conversation</p> <p>17 with her, I think, about it, but I don't</p> <p>18 recall specifically the conversation. Just</p> <p>19 in general terms, that's what I believe.</p> <p>20 Q. Is it your testimony that she told</p> <p>21 you in general terms in a conversation that</p> <p>22 she had gone to massage school?</p> <p>23 A. I don't recall a specific</p> <p>24 conversation, but that is my general</p> <p>25 impression.</p>
<p>Page 75</p> <p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. I have no idea, I don't know.</p> <p>5 Q. Prior to the time that Joanna gave</p> <p>6 you and Mr. Epstein massages, had she been a</p> <p>7 professional masseuse?</p> <p>8 MR. PAGLIUCA: Objection to form</p> <p>9 and foundation.</p> <p>10 A. I believe she went to massage</p> <p>11 school and became a professional masseuse.</p> <p>12 Q. Did she go to massage school before</p> <p>13 or after you met her?</p> <p>14 A. I believe after.</p> <p>15 Q. Who paid for her massage school?</p> <p>16 A. I have no idea.</p> <p>17 Q. Who arranged for her to go to</p> <p>18 massage school?</p> <p>19 A. I have no idea.</p> <p>20 Q. Did she ever give Mr. Epstein a</p> <p>21 massage before she went to massage school?</p> <p>22 A. I have no idea.</p> <p>23 Q. Did she ever give you a massage</p> <p>24 before she went to massage school?</p> <p>25 A. I have no idea.</p>	<p>Page 77</p> <p>1 G. Maxwell - Confidential</p> <p>2 Q. Do you know how long she was in</p> <p>3 massage school?</p> <p>4 A. I don't.</p> <p>5 Q. Did Mr. Epstein ask her to go to</p> <p>6 massage school?</p> <p>7 A. I don't know.</p> <p>8 Q. How old was Johanna when she gave</p> <p>9 you a massage?</p> <p>10 A. Mid 20s, I believe.</p> <p>11 Q. And was the timeframe in which she</p> <p>12 gave Mr. Epstein a massage the same timeframe</p> <p>13 she gave you a massage?</p> <p>14 A. I really don't recall. I can only</p> <p>15 recall her giving me massages. I know she</p> <p>16 gave Mr. Epstein massages, but I don't recall</p> <p>17 them. I know she gave me them, I know she</p> <p>18 gave me massages.</p> <p>19 Q. How old was she when she gave</p> <p>20 Mr. Epstein massages?</p> <p>21 A. I met her, I believe, when she was</p> <p>22 in her mid 20s, it would have been in her</p> <p>23 mid 20s.</p> <p>24 Q. Did Mr. Epstein, insofar as you</p> <p>25 believe, engage in sexual activities with</p>

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1 G. Maxwell - Confidential 2 Johanna? 3 A. I would not know. I would say no. 4 Q. Did you engage in sexual activities 5 with Johanna? 6 A. No. 7 Q. Do you know how Johanna came to 8 know Mr. Epstein? 9 A. I met her at her university and she 10 came to answer phones. 11 Q. When you say she came to answer 12 phones, where? 13 A. In Palm Beach. 14 Q. At Mr. Epstein's home in Palm 15 Beach? 16 A. Yes. 17 Q. So is it fair to say that Johanna 18 was initially hired to answer telephones, 19 according to your testimony? 20 MR. PAGLIUCA: This has already 21 been testified to Mr. Boies. We are 22 repeating testimony now. 23 MR. BOIES: I think in the context 24 of the witness' answers, these are fair 25 questions.	Page 78	1 G. Maxwell - Confidential 2 instructed that the right way to do it 3 was to bring any issue to him after the 4 conclusion of the deposition. 5 The question that has been raised 6 is whether we should interrupt the 7 deposition now and seek guidance of the 8 court before continuing the deposition. 9 My view is that the deposition 10 needs to continue, and the counsel for 11 the defendant can instruct not to answer 12 and any questions that are instructed 13 not to answer can be brought to the 14 court, but I would not consent to 15 terminating the deposition at this 16 point. 17 MR. PAGLIUCA: I don't know if it's 18 a matter of consent or not. If I move 19 for a protective order, the deposition 20 is over and we can go litigate it in 21 front of Judge Sweet. We are here and 22 I'd like to complete this deposition 23 because this case needs to move along, 24 and quite frankly, I don't want to spend 25 money coming back here to do this again	Page 80
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	Page 79	1 G. Maxwell - Confidential 2 or argue this in front of Judge Sweet. 3 But I will simply start referring 4 you back to the transcript and 5 instructing the witness not to answer 6 when I think we are getting into some 7 things that have been asked and answered 8 already. 9 MR. BOIES: Exactly the procedure 10 that I have proposed from the beginning. 11 If you think a question is out of 12 bounds, instruct not to answer and we 13 will then let the judge decide it. 14 BY MR. BOIES: 15 Q. How did it happen, Ms. Maxwell, 16 that Johanna, who had been hired to answer 17 the phones, ended up giving massages to you 18 and Mr. Epstein? 19 MR. PAGLIUCA: I'm going to 20 instruct you not to answer the question. 21 This has been previously, the subject of 22 your former deposition, it doesn't fall 23 into any of the categories ordered by 24 the court, and so you don't need to 25 answer that.	Page 81

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. Was Johanna 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 Johanna 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>Page 83</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 who was hired to</p> <p>15 answer the phone 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>Page 85</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</p>

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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.

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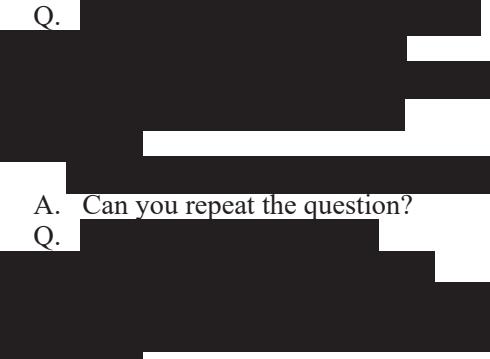
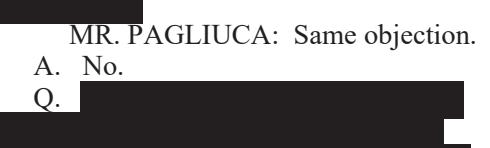
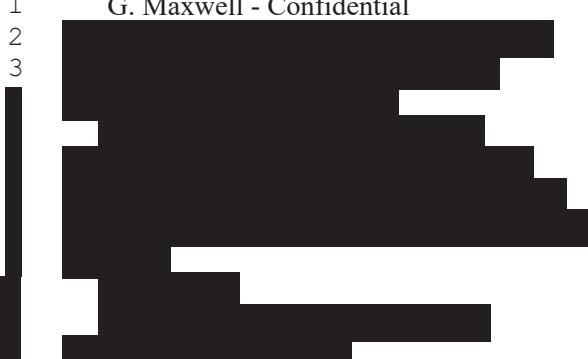
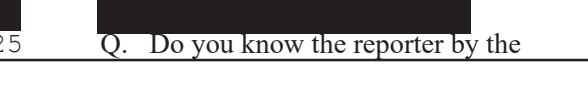
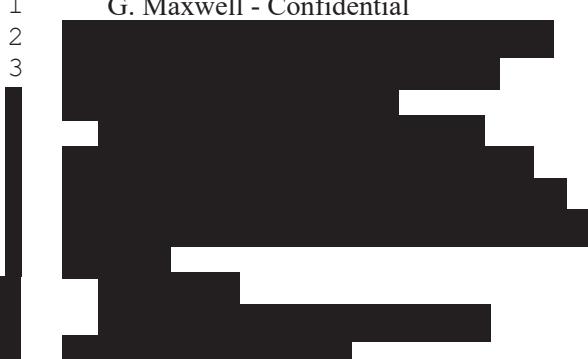
1 G. Maxwell - Confidential
2 [REDACTED]

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 	1 2	G. Maxwell - Confidential 
	Page 91		Page 93
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. 	1 2 3   	G. Maxwell - Confidential   Q. Do you know the reporter by the
25			

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

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

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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 Mr. Epstein had</p> <p>14 attempted to seduce both Maria and Annie</p> <p>15 Farmer?</p> <p>16 A. No.</p> <p>17 Q. Did you and Mr. Epstein visit Maria</p> <p>18 Farmer in Ohio?</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 Maria Farmer?</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 Maria Farmer?</p> <p>8 A. Yeah, I think Maria Farmer 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 Maria Farmer 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. Maria Farmer 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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<p>1 G. Maxwell - Confidential</p> <p>2 A. I don't know what -- I don't know</p> <p>3 who owned -- I don't know anything about the</p> <p>4 ownership of the property or how Jeffrey had</p> <p>5 it or why he stayed there, I don't know.</p> <p>6 Q. Was it clear to you that Jeffrey</p> <p>7 had arranged for Maria Farmer to stay at</p> <p>8 wherever she was staying in Ohio?</p> <p>9 MR. PAGLIUCA: Objection to form</p> <p>10 and foundation.</p> <p>11 A. I have no idea what the arrangement</p> <p>12 was between Maria Farmer and Jeffrey.</p> <p>13 Q. When you referred to the property</p> <p>14 where Maria Farmer was staying, you said you</p> <p>15 didn't know how Jeffrey had it?</p> <p>16 A. What's your question?</p> <p>17 Q. Was it your understanding that</p> <p>18 Jeffrey did have that property that she was</p> <p>19 staying at in some capacity or another,</p> <p>20 either owning it or leasing it or having been</p> <p>21 given it by a friend?</p> <p>22 MR. PAGLIUCA: Objection to form</p> <p>23 and foundation.</p> <p>24 A. I have no idea.</p> <p>25 Q. Where was this property that you</p>	<p>1 G. Maxwell - Confidential</p> <p>2 house in Columbus, Ohio, correct?</p> <p>3 A. I don't know the arrangement that</p> <p>4 Maria Farmer had with Jeffrey. I believe she</p> <p>5 was painting there, but I was never aware of</p> <p>6 the arrangement. I know that I saw her in</p> <p>7 Ohio at a house.</p> <p>8 Q. When you were with Maria Farmer at</p> <p>9 this house in Columbus, Ohio, Mr. Epstein was</p> <p>10 with you, correct?</p> <p>11 A. I went to Ohio with him on</p> <p>12 business, and we were at a house that he</p> <p>13 could stay at and I stayed at, and I recall</p> <p>14 Maria Farmer being at this house. That is</p> <p>15 what I recall.</p> <p>16 Q. When you went to Ohio with</p> <p>17 Mr. Epstein, did you see Maria Farmer on more</p> <p>18 than one occasion?</p> <p>19 A. I don't recall.</p> <p>20 Q. You saw Maria Farmer in Ohio with</p> <p>21 Mr. Epstein on at least one occasion,</p> <p>22 correct?</p> <p>23 MR. PAGLIUCA: Objection to form</p> <p>24 and foundation.</p> <p>25 A. I recall seeing her in Ohio, but I</p>
<p>1 G. Maxwell - Confidential</p> <p>2 and Mr. Epstein visited Maria Farmer at in</p> <p>3 Ohio?</p> <p>4 MR. PAGLIUCA: Objection to form</p> <p>5 and foundation.</p> <p>6 A. It was in Columbus.</p> <p>7 Q. Was it a house or an apartment?</p> <p>8 A. It was a house.</p> <p>9 Q. When you and Mr. Epstein visited</p> <p>10 Maria Farmer at this house in Columbus, was</p> <p>11 anyone else in the house?</p> <p>12 A. I never visited Maria Farmer at the</p> <p>13 house.</p> <p>14 Q. Did you see Maria Farmer in Ohio?</p> <p>15 A. I recall seeing her, but I didn't</p> <p>16 visit. I didn't go to Ohio to see Maria</p> <p>17 Farmer.</p> <p>18 Q. When you went to Ohio, did you see</p> <p>19 Maria Farmer?</p> <p>20 A. I recall seeing Maria Farmer in</p> <p>21 Ohio.</p> <p>22 Q. Where did you see her?</p> <p>23 A. I recall seeing her at this house</p> <p>24 that Jeffrey stayed at.</p> <p>25 Q. Maria Farmer was staying in the</p>	<p>1 G. Maxwell - Confidential</p> <p>2 couldn't tell you how many times I saw her.</p> <p>3 For sure once, because I have a recollection</p> <p>4 of seeing her once.</p> <p>5 Q. And the house in which you and</p> <p>6 Mr. Epstein and Maria Farmer were in</p> <p>7 Columbus, Ohio, was that a house that you and</p> <p>8 Mr. Epstein were staying in overnight?</p> <p>9 A. I stayed overnight there.</p> <p>10 Q. Was Maria Farmer staying there</p> <p>11 overnight?</p> <p>12 A. I don't recall.</p> <p>13 Q. How many nights did you and</p> <p>14 Mr. Epstein stay in this house in Columbus?</p> <p>15 A. I don't recall.</p> <p>16 Q. Was it more than one?</p> <p>17 A. I don't recall.</p> <p>18 Q. The night or nights that you and</p> <p>19 Mr. Epstein stayed at this house in Columbus,</p> <p>20 was Maria Farmer there?</p> <p>21 A. I don't recall.</p> <p>22 Q. When you saw Maria Farmer in Ohio,</p> <p>23 did you talk to her?</p> <p>24 A. I'm assuming I must have said</p> <p>25 hello, so yes.</p>

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

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<p>1 G. Maxwell - Confidential 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 Sarah Kellen Vickers? 8 A. A long time ago. So long, I don't 9 recall. 10 Q. Were you aware that Sarah Kellen 11 Vickers 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 Sarah Kellen 16 Vickers 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</p>	<p>Page 118</p> <p>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. 24 Nadia Marcinkova, do you know her? 25 A. I do.</p> <p>Page 120</p>
<p>1 G. Maxwell - Confidential 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 Ms. Kellen 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 Sarah 14 Kellen Vickers 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</p>	<p>Page 119</p> <p>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 Nadia 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 Nadia 23 Marcinkova, did you ever talk to Mr. Epstein 24 about whether or not that police report was 25 or was not accurate?</p> <p>Page 121</p>

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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 Sarah Kellen 5 Vickers 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 Sarah Kellen Vickers? 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 Sarah Kellen 21 Vickers? 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 Sarah Kellen Vickers 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 Sarah Kellen Vickers 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 Nadia Marcinkova.</p> <p>23 Did you know, yourself, Nadia Marcinkova?</p> <p>24 A. I met her.</p> <p>25 Q. Where did you meet her?</p>	<p>Page 126</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 Nadia Marcinkova?</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 Nadia Marcinkova, 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 Nadia Marcinkova</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 Nadia Marcinkova?</p> <p>24 A. None.</p> <p>25 Q. Did you ever have any discussions</p>	<p>Page 128</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 Nadia 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 Nadia work for Mr. Epstein?</p> <p>15 A. I don't know.</p> <p>16 Q. Did Nadia 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 Nadia Marcinkova</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>Page 127</p>	<p>1 G. Maxwell - Confidential</p> <p>2 with Nadia Marcinkova 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 Nadia Marcinkova?</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 Nadia Marcinkova, 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 Alfredo Rodriguez</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. He is dead.</p> <p>21 Q. Before he died?</p> <p>22 A. He was a butler.</p> <p>23 Q. A butler for whom?</p> <p>24 A. Mr. Epstein in Palm Beach.</p> <p>25 Q. And was he a butler for Mr. Epstein</p>	<p>Page 129</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. When did he become a butler for 5 Mr. Epstein? 6 A. I believe late -- middle of 2000s. 7 2004, 2005, something like that. 8 Q. When he became a butler for 9 Mr. Epstein, did he work for Mr. Epstein in 10 Palm Beach? 11 A. I believe he did. 12 Q. And did you see Mr. Rodriguez at 13 Mr. Epstein's Palm Beach residence while Mr. 14 Rodriguez was working as a butler for 15 Mr. Epstein? 16 A. I was not in Palm Beach when he was 17 working for Mr. Epstein. 18 Q. I think you answered the question, 19 but I want to be absolutely certain. Is it 20 your testimony that you never saw 21 Mr. Rodriguez at Mr. Epstein's Palm Beach 22 residence? 23 A. That is not my testimony. 24 Q. Did you ever see Mr. Rodriguez at 25 Mr. Epstein's Palm Beach residence?</p>	<p>1 G. Maxwell - Confidential 2 Q. Did you see Mr. Rodriguez 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>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 Mr. Rodriguez 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 Mr. Rodriguez 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 Mr. Rodriguez? 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>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>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>4</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>7</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>
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	<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>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</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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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. I believe so.</p> <p>5 Q. Were any of these people on the</p> <p>6 list, obviously leaving aside Mr. Epstein</p> <p>7 himself, people who, to your knowledge,</p> <p>8 received massages at one or more of Mr.</p> <p>9 Epstein's properties?</p> <p>10 MR. PAGLIUCA: Objection to form</p> <p>11 and foundation.</p> <p>12 A. I couldn't say.</p> <p>13 Q. Are there any people on this list</p> <p>14 who you have reason to believe received</p> <p>15 massages at one or more of Mr. Epstein's</p> <p>16 properties?</p> <p>17 MR. PAGLIUCA: Objection to form</p> <p>18 and foundation.</p> <p>19 A. I couldn't say.</p> <p>20 Q. Just to be clear, my most recent</p> <p>21 question is whether any of the people on this</p> <p>22 list are people who you have reason to</p> <p>23 believe received massages at one of Mr.</p> <p>24 Epstein's properties?</p> <p>25 MR. PAGLIUCA: Same objection.</p>	<p>1 G. Maxwell - Confidential</p> <p>2 and foundation.</p> <p>3 A. Eva Anderson was his girlfriend.</p> <p>4 Q. I am sorry?</p> <p>5 A. Eva Anderson was his girlfriend.</p> <p>6 Q. When was Eva Anderson Mr. Epstein's</p> <p>7 girlfriend?</p> <p>8 A. I don't know the dates, but I</p> <p>9 believe in the '80s.</p> <p>10 Q. In the 1980s?</p> <p>11 A. Yeah, and part of the 1990s, I</p> <p>12 believe. So I don't know when they started</p> <p>13 and when they ended. They were in a</p> <p>14 long-term relationship.</p> <p>15 Q. Was Mr. Epstein engaged in sexual</p> <p>16 activities with Eva Anderson during the</p> <p>17 period of time that you were involved with</p> <p>18 Mr. Epstein?</p> <p>19 A. I wouldn't know.</p> <p>20 Q. How old was Eva Anderson when she</p> <p>21 was first involved with Mr. Epstein?</p> <p>22 A. I don't know.</p> <p>23 Q. How old was Eva Anderson when you</p> <p>24 first met her?</p> <p>25 A. I don't recall.</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 A. I couldn't say.</p> <p>3 Q. Why can't you say?</p> <p>4 A. Because I just don't know.</p> <p>5 Q. Well, you know whether you have a</p> <p>6 reason to believe, correct?</p> <p>7 MR. PAGLIUCA: Objection to form</p> <p>8 and foundation.</p> <p>9 A. These are events that took place 17</p> <p>10 years ago, and I really do not know. It is</p> <p>11 possible that people on that list got a</p> <p>12 massage, it's also possible they didn't. I</p> <p>13 really don't know, leaving aside, of course,</p> <p>14 Mr. Epstein himself.</p> <p>15 Q. Yes.</p> <p>16 MR. PAGLIUCA: One second, I'm</p> <p>17 getting text messages.</p> <p>18 [REDACTED]</p> <p>22 Q. Are there any names on this list</p> <p>23 that you have reason to believe Mr. Epstein</p> <p>24 engaged in sexual activities with?</p> <p>25 MR. PAGLIUCA: Objection to form</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. Did any of the people on this list,</p> <p>3 other than Mr. Epstein himself, and the list</p> <p>4 is Exhibit 28, ever ask you to arrange a</p> <p>5 massage?</p> <p>6 MR. PAGLIUCA: Objection to form</p> <p>7 and foundation.</p> <p>8 A. Not that I recall.</p> <p>9 Q. Did you arrange a massage for any</p> <p>10 of the people on this list other than</p> <p>11 Mr. Epstein?</p> <p>12 A. Not that I recall.</p> <p>13 Q. Were any of the people on this</p> <p>14 list, other than Mr. Epstein, given a massage</p> <p>15 at any of Mr. Epstein's residences?</p> <p>16 MR. PAGLIUCA: Objection to form</p> <p>17 and foundation. Asked and answered.</p> <p>18 A. I wouldn't know.</p> <p>19 Q. Did any of the people on this list,</p> <p>20 other than Mr. Epstein, engage in sexual</p> <p>21 activities with anyone at Mr. Epstein's</p> <p>22 properties?</p> <p>23 MR. PAGLIUCA: Objection to form</p> <p>24 and foundation.</p> <p>25 A. I wouldn't know.</p>

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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 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.

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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 Mr. Brunel. Now,
 7 you testified that you have no reason to
 8 believe that Mr. Brunel 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 Mr. Brunel engage
 13 in sexual activities with anyone?

14 A. I did not.

15 Q. Did you ever see Mr. Brunel 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 Nadia
 17 Marcinkova?

18 A. I have never talked about sex with
 19 Nadia at any point. I have hardly ever
 20 spoken to her.

21 Q. Would your testimony be the same
 22 with respect to Sarah Kellen Vickers?

23 A. That would be true, correct, I have
 24 not.

25 Q. And Virginia Roberts?

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 2 [REDACTED]

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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 Tony Figueroa, 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 Carolyn Andriamo, A-N-D-R-I-A-M-O? 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 Mr. Figueroa, 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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1 G. Maxwell - Confidential
 2 Rizzo?
 3 A. I do not.
 4 Q. Who is he?
 5 A. I don't know him -- I know who he
 6 is now, but he worked, I believe, for Eva and
 7 Glenn, but prior to --
 8 Q. Eva and Glenn Dubin?
 9 A. Yeah.
 10 Q. It's your testimony you never met
 11 Mr. Rizzo?
 12 A. I don't recall ever meeting him.
 13 Q. Do you remember being at the
 14 Dubins' residence with Mr. Rizzo and with a
 15 [REDACTED]
 16 A. I do not.
 17 Q. Do you ever remember a [REDACTED]
 18 [REDACTED] during
 19 the period of time that you were with
 20 Mr. Epstein?
 21 A. I do not.
 22 Q. Was there ever a time when you were
 23 at the Dubin residence with a girl under the
 24 age of 21 who had been with Mr. Epstein?
 25 MR. PAGLIUCA: Objection to form

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1 G. Maxwell - Confidential
 2 and foundation.
 3 A. Can you repeat the question,
 4 please?
 5 Q. Sure.
 6 You remember from time to time
 7 being at the Dubin residence, correct?
 8 A. I do.
 9 Q. And I think you testified that you
 10 don't remember whether Mr. Rizzo was present
 11 on any of those occasions, although he might
 12 have been, correct?
 13 A. If Mr. Rizzo was standing right
 14 here in front of me, I wouldn't know who he
 15 is.
 16 Q. Does that mean you are saying that
 17 you never met him or simply that you don't
 18 remember him?
 19 A. I don't know if I ever met him, but
 20 if I saw him in a picture, maybe I would
 21 recognize it, but I don't believe I'd
 22 remember him.
 23 Q. Did you ever go to the Dubin
 24 residence with some woman who had previously
 25 been with Mr. Epstein?

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1 G. Maxwell - Confidential
 2 MR. PAGLIUCA: Objection to form
 3 and foundation.
 4 A. No, no.
 5 Q. Let me see if I can possibly
 6 refresh your recollection. Do you recall
 7 being at the Dubin residence with [REDACTED]
 8 [REDACTED] that was crying and very
 9 distraught?
 10 A. I have never seen that.
 11 Q. Did you ever take the passport of
 12 any person who had told you that Mr. Epstein
 13 had demanded sex of them?
 14 A. No.
 15 Q. Were you ever at any residence of
 16 Mr. Epstein's when Alan Dershowitz was
 17 present?
 18 A. I'm sure I was.
 19 Q. Were you at Mr. Epstein's Palm
 20 Beach residence when Mr. Dershowitz was
 21 present?
 22 A. I may have been. It's possible.
 23 Q. Were you at Mr. Epstein's New
 24 Mexico property when Mr. Dershowitz was
 25 present?

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1 G. Maxwell - Confidential
 2 A. I don't have any memory of that,
 3 but it's possible. I just don't recall it.
 4 Q. Were you at Mr. Epstein's Virgin
 5 Islands property when Mr. Dershowitz was
 6 present?
 7 A. That I do recall, yes.
 8 Q. Were you at Mr. Epstein's New York
 9 property when Mr. Dershowitz was present?
 10 A. Again, it's possible, but I don't
 11 have a memory of it.
 12 Q. How many times do you recall being
 13 at Mr. Epstein's Virgin Island property when
 14 Mr. Dershowitz was also present?
 15 A. I only recall once.
 16 Q. When was that?
 17 A. I don't recall the date.
 18 Q. Who else was present on that time?
 19 A. I believe his wife and his
 20 daughter.
 21 Q. Anyone else?
 22 A. I don't recall anyone else.
 23 Q. Anyone else on the whole island. I
 24 don't just mean with him. I mean did
 25 Mr. Epstein have other guests with him at

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

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1 G. Maxwell - Confidential
 2 Q. What is Caroline Casey's connection
 3 to Mr. Epstein?
 4 A. I don't know.
 5 Q. Did you ever speak to Caroline
 6 Casey?
 7 A. I don't recall. I know her name,
 8 and that's all I can -- I don't recall a
 9 conversation with her. I don't recall who
 10 she is at this point.
 11 Q. Was Caroline Casey someone who
 12 provided massages for Mr. Epstein?
 13 A. I don't believe so.
 14 Q. Did Caroline Casey perform any
 15 services for Mr. Epstein?
 16 MR. PAGLIUCA: Objection to form
 17 and foundation.
 18 A. I have no idea, I'm sorry.
 19 Q. When did you first become aware of
 20 charges that Mr. Epstein was having sex with
 21 a significant number of people at his
 22 residences?
 23 MR. PAGLIUCA: You don't have to
 24 answer that question. It's outside of
 25 the court's order.

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1 G. Maxwell - Confidential
 2 Q. You have testified that you were
 3 only aware of a few people that Mr. Epstein
 4 had sex with or engaged in sexual activities
 5 with at his residences, correct?
 6 MR. PAGLIUCA: Objection to form
 7 and foundation.
 8 A. I didn't say that.
 9 Q. How many people are you aware of
 10 that Mr. Epstein engaged in sexual activities
 11 with at his residences?
 12 A. I'm not aware.
 13 Q. You are aware of some?
 14 A. Well, the ones that we've
 15 discussed, but that's all I'm aware of.
 16 Q. That's my question.
 17 A. Then I can concur, yes.
 18 Q. Let's be clear. You have
 19 identified three people.
 20 [REDACTED]

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1 G. Maxwell - Confidential
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 A. Are you giving me a timeframe here,
 9 because it's been a long time. I'm assuming
 10 he is having sexual relations today. You
 11 have to bind it to some time.
 12 Q. You don't know who he is having
 13 sexual relationships with today, do you?
 14 A. No.
 15 Q. So you can only tell me who
 16 Mr. Epstein was having sexual relationships
 17 with at a time when you knew about it,
 18 correct?
 19 A. I have no knowledge of him actually
 20 having sex with anybody else outside of what
 21 we have identified.
 22 [REDACTED]
 23 Q. Now, there came a time when you
 24 learned that people were asserting that he
 25 had had sexual activities with a lot more

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1 G. Maxwell - Confidential
 2 than those three people at his residences,
 3 correct? During the period of time that you
 4 were involved with Mr. Epstein, correct?
 5 A. Like everybody else, like the rest
 6 of the world, when it was announced in the
 7 papers.
 8 Q. Yes.
 9 And that was during 2005?
 10 A. Whenever it was.
 11 Q. At that point, did you do anything
 12 to try to find out whether those assertions
 13 were or were not accurate?
 14 MR. PAGLIUCA: You don't have to
 15 answer that. That's outside the court's
 16 order.
 17 Q. When you heard that there were
 18 assertions that Mr. Epstein had engaged in
 19 sexual activities with people who you had met
 20 at Mr. Epstein's residences, did you do
 21 anything to determine whether those
 22 assertions were or were not accurate?
 23 MR. PAGLIUCA: Objection to form
 24 and foundation, and you don't have to
 25 answer that question. It's outside the

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 2 court's order.

3 Q. In terms of preparing for this
 4 deposition, what documents did you review?

5 MR. PAGLIUCA: To the extent I
 6 provided you with any documents to
 7 review, I will tell you that's both --
 8 it's privileged and I instruct you not
 9 to answer.

10 Q. Did your lawyer provide you with
 11 any documents to review in preparation for
 12 this deposition that refreshed your
 13 recollection about any of the events that
 14 occurred?

15 MR. PAGLIUCA: You can answer that
 16 question.

17 A. No.

18 Q. How many documents did your lawyer
 19 provide you with?

20 MR. PAGLIUCA: You can answer.

21 A. One, I believe.

22 Q. One document. Was that a document
 23 that had been prepared by your attorney, or
 24 was it a document from the past?

25 MR. PAGLIUCA: I will tell you not

1 G. Maxwell - Confidential
 2 sexual activities with [REDACTED]

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

5 A. I didn't have any reason -- I had
 6 no idea whether they were or weren't.

7 Q. Were you with Mr. Epstein in 2005
 8 when the Palm Beach police launched their
 9 investigation?

10 MR. PAGLIUCA: You don't have to
 11 answer the question. That's outside the
 12 court's order.

13 Q. When the Palm Beach police launched
 14 their investigation in 2005, did you make any
 15 effort to retain records of the women who had
 16 been present at Mr. Epstein's residences in
 17 the prior period?

18 MR. PAGLIUCA: Don't answer that
 19 question. It's outside the court's
 20 order.

21 Q. When the Palm Beach police launched
 22 their investigation in 2005, were you aware
 23 of any effort to destroy records of women who
 24 had been present at Mr. Epstein's residences
 25 in the prior period?

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1 G. Maxwell - Confidential
 2 to answer that question.

3 Q. Was the document that your attorney
 4 showed you a document that you had ever seen
 5 before?

6 MR. PAGLIUCA: Again, don't answer
 7 questions about what I showed you or
 8 didn't show you.

9 She already testified that nothing
 10 refreshed her recollection.

11 MR. BOIES: I don't have to accept
 12 that answer. I can ask these questions,
 13 and I think these are clearly not
 14 privileged questions.

15 Q. Do you know a [REDACTED]

16 A. I do.

17 Q. Who is [REDACTED]

18 A. She was a friend of Jeffrey's.

19 Q. Was [REDACTED] someone with whom
 20 Mr. Epstein engaged in sexual activities?

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

23 A. I don't know.

24 Q. Did you ever have any reason to
 25 believe that Mr. Epstein was engaged in

1 G. Maxwell - Confidential
 2 MR. PAGLIUCA: Don't answer that
 3 question. It's outside the court's
 4 order.

5 Q. In 2005, were you aware of any
 6 effort to destroy records of messages you had
 7 taken of women who had called Mr. Epstein in
 8 the prior period?

9 MR. PAGLIUCA: Don't answer that
 10 question. It's outside the court's
 11 order.

12 MR. BOIES: I said I would give you
 13 a break every hour. It's been an hour.

14 MR. PAGLIUCA: Do you want a break
 15 or do you want to keep going?

16 THE WITNESS: Keep going.

17 MR. BOIES: What I told you before,
 18 you asked for a break every hour. I am
 19 happy to give you a break at a fixed
 20 time. What I'm not happy to do is
 21 interrupt a chain of examination.

22 So if you want a break now, we will
 23 take a break now. If you don't want a
 24 break now, we will not break for another
 25 hour.

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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 Sherrie. I recognize</p> <p>9 Allison Chambers. Caroline Casey. These are</p> <p>10 names that ring bells, nothing else.</p> <p>11 Dara. I recognize the name.</p> <p>12 Q. Where is Dara?</p> <p>13 A. Dara Preece. 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 Gwendolyn Beck.</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 Sherrie Lynch, Allison chambers, Caroline</p> <p>22 Casey, Dara Preece and Gwendolyn Beck, were</p> <p>23 any of those people, people who provided</p> <p>24 massages to Mr. Epstein?</p> <p>25 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 Sherrie</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 Joanne?</p> <p>17 A. Is that Johanna? Where is that?</p> <p>18 That's Johanna, I'm sorry, I missed her.</p> <p>19 That would probably be Johanna Sieberg.</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. Amy Birse?</p> <p>24 A. I don't know who that is.</p> <p>25 Q. What about Melissa Hanes?</p>

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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.

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1 G. Maxwell - Confidential
 2 Q. Next one is [REDACTED] --
 3 A. Tony is Virginia's guy that you
 4 asked me about. I don't know Tony.
 5 Q. I asked you about a Tony Figueroa.
 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.

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1 G. Maxwell - Confidential
 2 Q. Melanie?
 3 A. No.
 4 Q. And there is a Melanie Haynes?
 5 A. I don't know.
 6 Q. [REDACTED]
 7 A. No idea.
 8 Q. Then there is Caroline Andriano?
 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 Dominique Kelly?
 13 A. I have no idea who that is.
 14 Q. Mary Southwell?
 15 A. No idea.
 16 Q. Somebody that's listed as
 17 [REDACTED], Virginia's friend?
 18 A. No.
 19 Q. Diane Cahill, do you know who that
 20 is?
 21 A. No.
 22 Q. How about [REDACTED] Tony's friend?
 23 A. No.
 24 Q. Do you know who Tony is?
 25 A. No.

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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.

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<p>1 G. Maxwell - Confidential</p> <p>2 Tila Davies, which of Mr. Epstein's</p> <p>3 residences did you see Tila Davis at?</p> <p>4 A. I don't have a memory of Tila,</p> <p>5 where I would have seen her.</p> <p>6 Q. Did you see her at some residence</p> <p>7 or property?</p> <p>8 A. I did.</p> <p>9 Q. Of Mr. Epstein?</p> <p>10 A. I did.</p> <p>11 Q. You just can't remember which ones,</p> <p>12 is that fair?</p> <p>13 A. Yes, that's fair.</p> <p>14 Q. Tiffany Gramza, which residences of</p> <p>15 Mr. Epstein did you see Tiffany at?</p> <p>16 A. I don't actually recall meeting</p> <p>17 Tiffany, so I can't recall.</p> <p>18 Q. So Tiffany Gramza may be somebody</p> <p>19 who you never met, is that your testimony?</p> <p>20 A. No, I'm not saying that. I just</p> <p>21 don't recall her really at all. I'm sorry, I</p> <p>22 don't recall.</p> <p>23 Q. Did you see Tiffany at some</p> <p>24 residence or property of Mr. Epstein?</p> <p>25 A. I don't recall.</p>	<p>1 G. Maxwell - Confidential</p> <p>2 not to answer these questions anymore.</p> <p>3 These do not appear -- I let this go on,</p> <p>4 they don't appear to be tied to the</p> <p>5 court's order as relating to sex or</p> <p>6 massages or anything that's contained in</p> <p>7 the order. This is just simply what was</p> <p>8 somebody doing at some property at some</p> <p>9 point in time. So don't answer these</p> <p>10 questions.</p> <p>11 Q. It is your assertion that, leaving</p> <p>12 Mr. Epstein aside, none of the people on this</p> <p>13 list engaged in sexual activities with either</p> <p>14 you or Mr. Epstein, correct?</p> <p>15 MR. PAGLIUCA: Objection to form</p> <p>16 and foundation.</p> <p>17 A. I can only testify to myself. I</p> <p>18 cannot testify to Mr. Epstein.</p> <p>19 Q. With respect to Mr. Epstein, do you</p> <p>20 know, one way or another, whether any of</p> <p>21 these people engaged in sexual activities?</p> <p>22 A. With respect to Mr. Epstein, how</p> <p>23 would I know that?</p> <p>24 Q. The answer is lots of ways, but all</p> <p>25 I can do is ask you whether you know it or</p>
<p>Page 187</p> <p>1 G. Maxwell - Confidential</p> <p>2 Q. Clara Hazel, what properties of</p> <p>3 Mr. Epstein did you see Clare Hazel at?</p> <p>4 A. Palm Beach, and I believe New</p> <p>5 Mexico and New York.</p> <p>6 Q. And Melinda Luntz?</p> <p>7 A. Palm Beach, I believe.</p> <p>8 Q. And what was Melinda Luntz doing at</p> <p>9 Palm Beach when you saw her?</p> <p>10 A. If I remember correctly, she was a</p> <p>11 real estate broker.</p> <p>12 Q. Did you see Melinda Luntz at</p> <p>13 Mr. Epstein's Virgin Island property?</p> <p>14 A. I don't recall.</p> <p>15 Q. When you saw Clare Hazel in Palm</p> <p>16 Beach and New Mexico and New York, what was</p> <p>17 she doing?</p> <p>18 A. I don't know.</p> <p>19 Q. Do you know why she was there?</p> <p>20 A. I think she was just a friend.</p> <p>21 Q. A friend of Mr. Epstein's?</p> <p>22 A. Yeah.</p> <p>23 Q. Alexia Wallaert, what Epstein</p> <p>24 properties did you see her at?</p> <p>25 MR. PAGLIUCA: I will now tell you</p>	<p>Page 189</p> <p>1 G. Maxwell - Confidential</p> <p>2 not.</p> <p>3 A. I don't.</p> <p>4 Q. Do you have any reason to believe</p> <p>5 -- because I don't want to get stuck on your</p> <p>6 concept of personal knowledge -- do you have</p> <p>7 any reason to believe that any of the people</p> <p>8 on this list had sexual activities with</p> <p>9 Mr. Epstein?</p> <p>10 A. I do not.</p> <p>11 Q. Do you have any reason to believe</p> <p>12 that any of these people had massages at any</p> <p>13 Epstein property?</p> <p>14 A. I have no idea. It's entirely</p> <p>15 possible, but I have no idea.</p> <p>16 Q. Do you have any reason to believe</p> <p>17 that any of the people on this list, other</p> <p>18 than Mr. Epstein himself, engaged in sexual</p> <p>19 activities with anyone on Mr. Epstein's</p> <p>20 properties?</p> <p>21 A. I have no reason to believe that.</p> <p>22 Q. Let me go to the Dubin residence.</p> <p>23 I asked you some questions about the Dubin</p> <p>24 residence earlier and about a possible visit</p> <p>25 to that residence of a [REDACTED]. Do you</p>

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

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			Page 194	Page 196
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	
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13	Exhibit 26 List of names	23	13	
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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
15
16 GHISLAINE MAXWELL DATE
17
18
19
20 Subscribed and sworn
to before me this
21 day of , 2016.
22 My commission expires:
23
24 Notary Public
25

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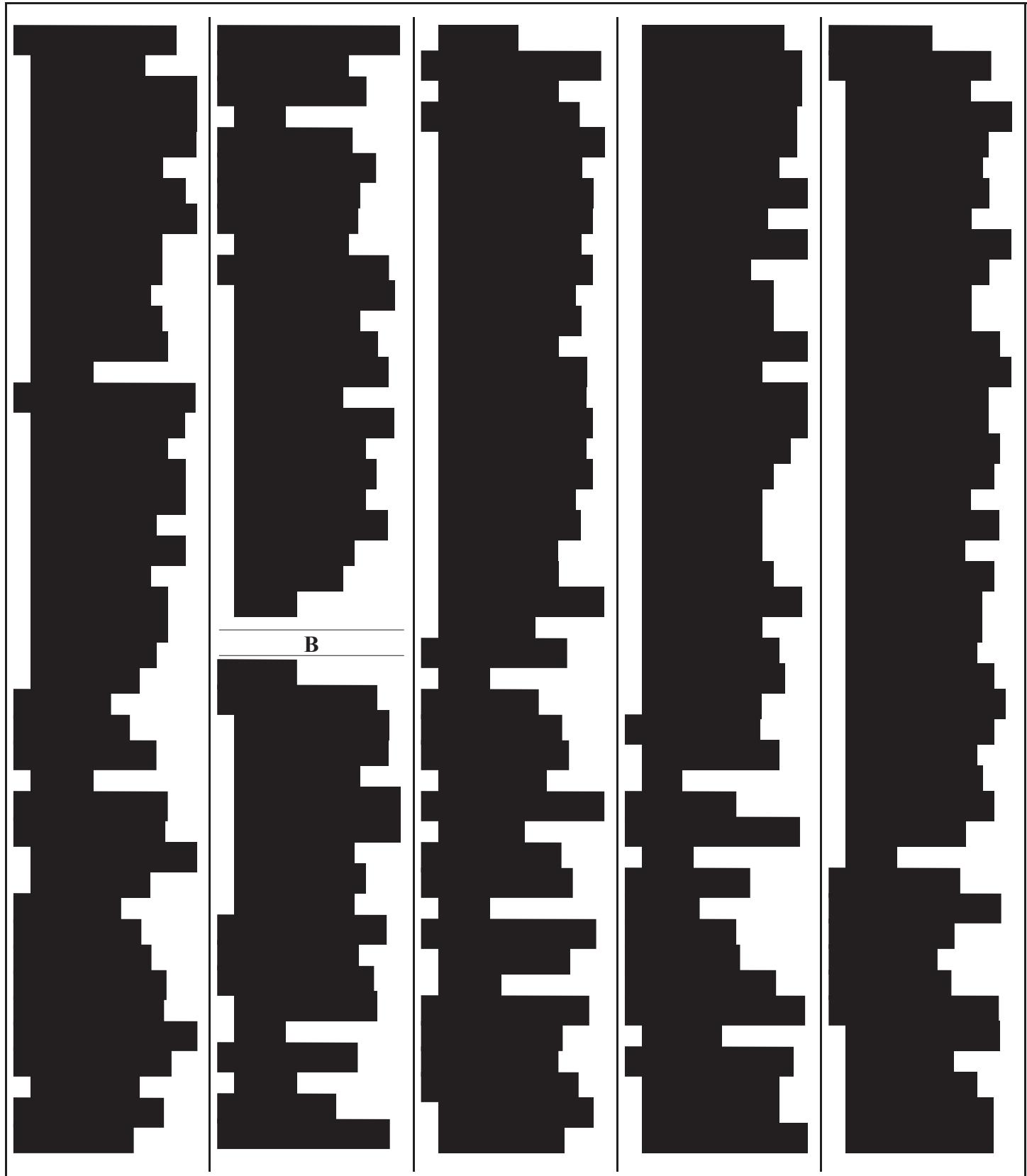
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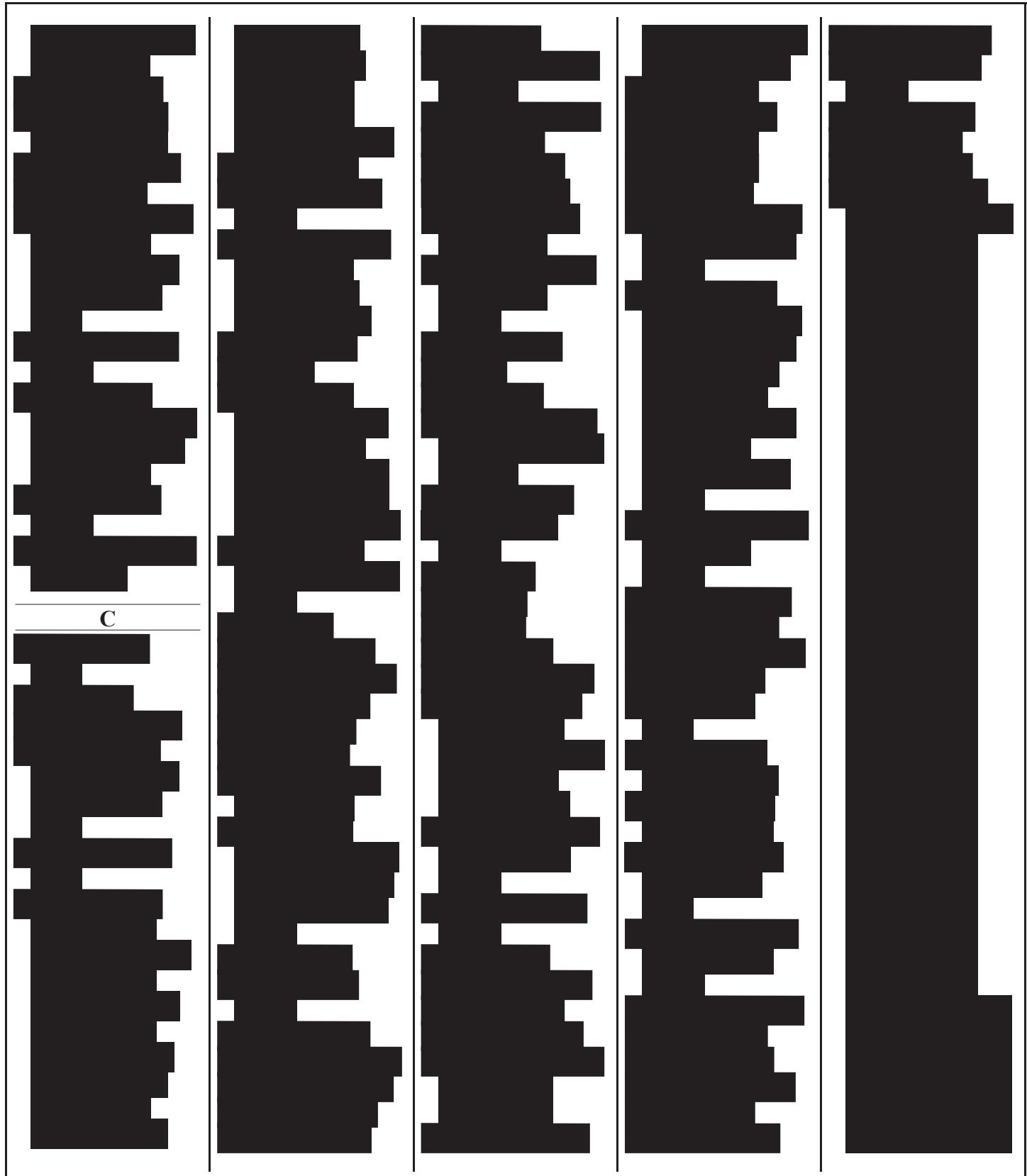
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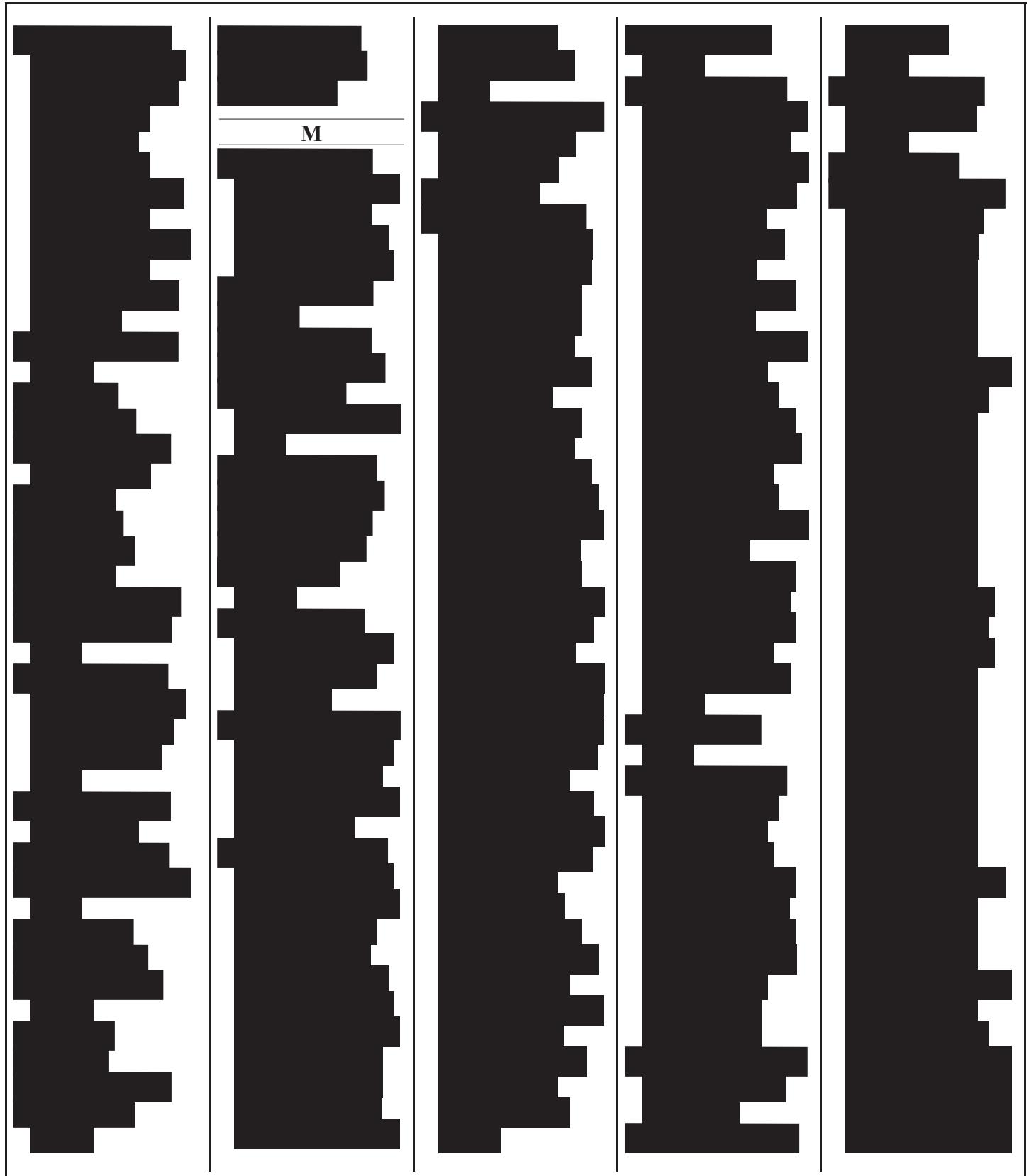
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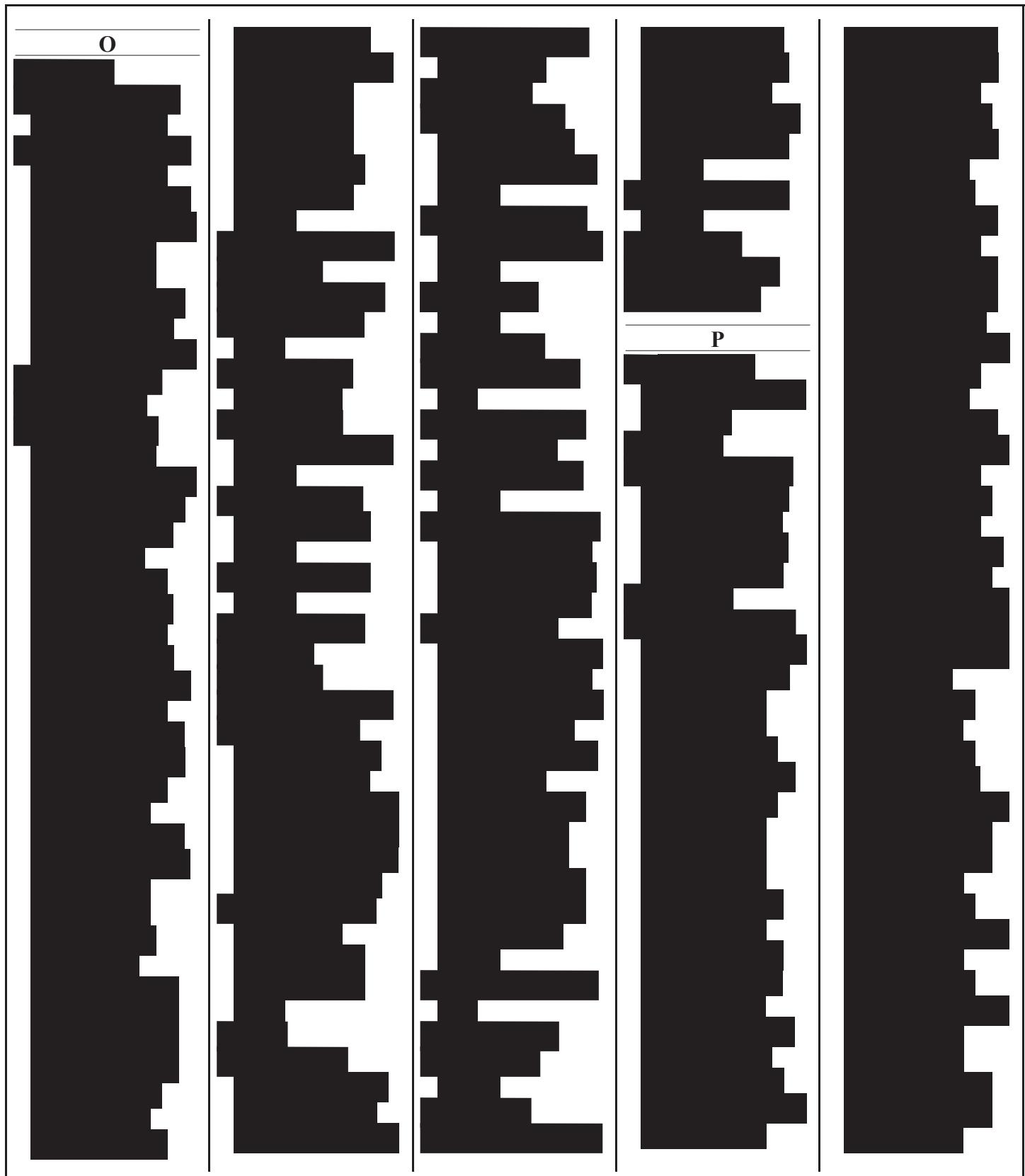
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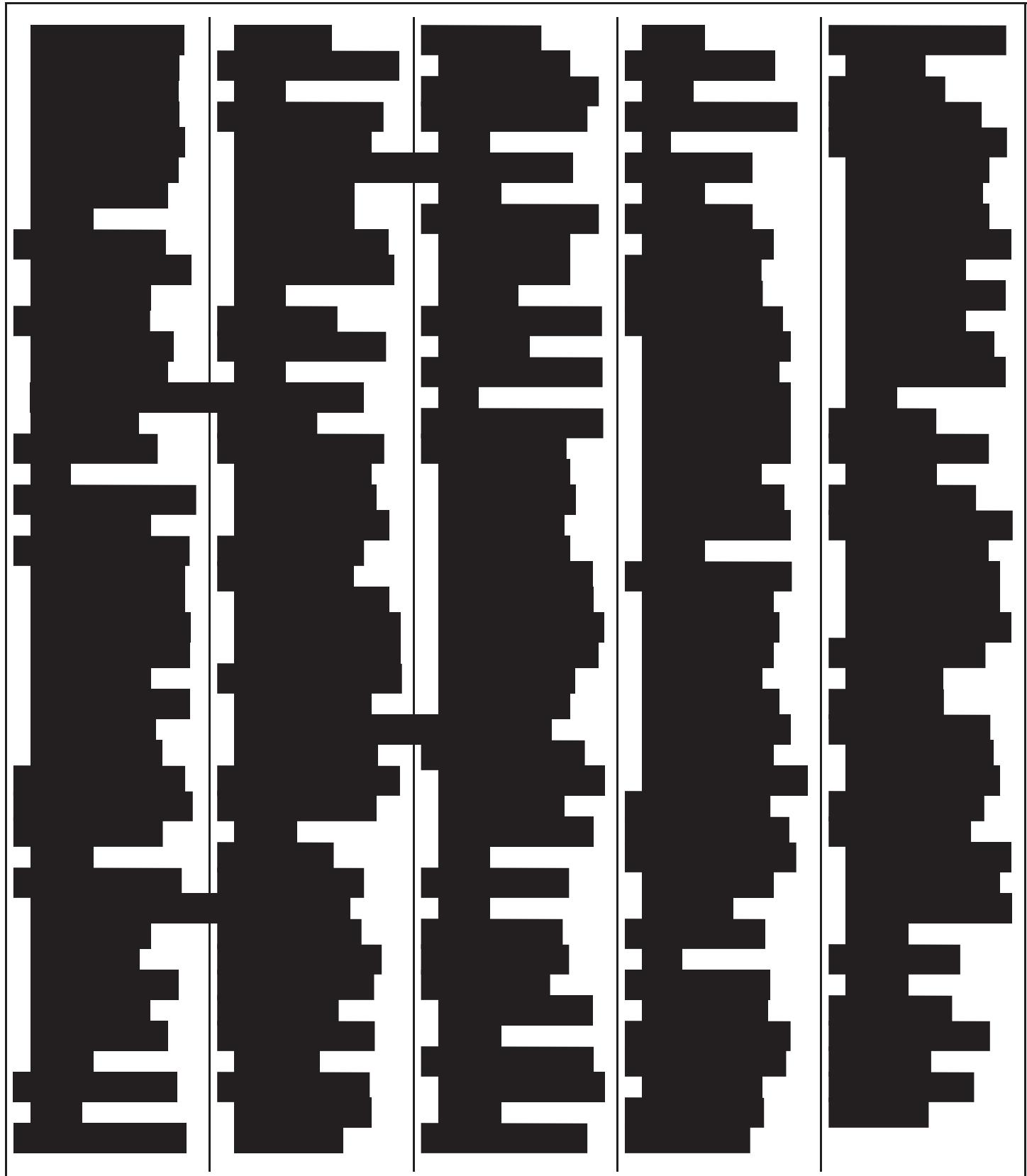
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