

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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 BY: JEFFREY S. PAGLIUCA, ESQUIRE
 LAURA A. MENNIGER, ESQUIRE
 Also Present:

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 GHISLAINE MAXWELL,
 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 THE VIDEOGRAPHER: This is DVD No.
 2 1, Volume II, of the continued video
 3 recorded deposition of Ghislaine Maxwell
 4 in the matter Virginia Giuffre against
 5 Ghislaine Maxwell, in the United States
 6 District Court, Southern District of New
 7 York.

8 This deposition is being held at
 9 575 Lexington Avenue, New York, New
 10 York, on July 22, 2016 at approximately
 11 9:04 a.m.

12 My name is Rodolfo Duran. I am the
 13 legal video specialist. The court
 14 reporter is Leslie Fagin, and we are
 15 both in association with Magna Legal
 16 Services.

17 Will counsel please introduce
 18 themselves.

19 MR. BOIES: This is David Boies, of
 20 Boies, Schiller & Flexner, counsel for
 21 plaintiff.

22 MS. SCHULTZ: Meredith Schultz,
 23 from Boies Schiller & Flexner, counsel
 24 for plaintiff.
 25

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 2 [REDACTED]

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22 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 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.

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|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;">Page 10</p> <p>1 G. Maxwell - Confidential 2 [REDACTED]</p> | <p style="text-align: right;">Page 12</p> <p>1 G. Maxwell - Confidential 2 [REDACTED]</p> |
| <p style="text-align: right;">Page 11</p> <p>1 G. Maxwell - Confidential 2 [REDACTED]</p> | <p style="text-align: right;">Page 13</p> <p>1 G. Maxwell - Confidential 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 Q. You understand that you are under 7 oath, correct? 8 A. I do. 9 Q. And you understand that the oath 10 requires you to tell the truth, the whole 11 truth and nothing but the truth in response 12 to questions? 13 MR. PAGLIUCA: Object to the form 14 and foundation. 15 Q. Do you? 16 A. I do understand that. 17 Q. Do you understand if you fail to do 18 that, that you could be prosecuted for 19 perjury? 20 MR. PAGLIUCA: Object to the form 21 and foundation. 22 A. I understood that is what happens 23 at these events. 24 Q. And do you understand that if you 25 say that you do not recall and in fact you do</p> |

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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.

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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 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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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.
14

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

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

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

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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.
17

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

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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

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

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 course of receiving a massage someone would
 come in and sit and chat to me while I was
 getting a massage, a friend would come in.
 That has happened.

Q. Do you recall that happening?

A. Not with specificity, I can't think
 of it actually, but I know that I've had
 friends come in and we've talked and as I got
 a massage, that has happened.

Q. Have you ever received a massage
 when Mr. Epstein was present?

A. He has entered the room and gave me
 a message or asked me a question, that has
 happened.

Q. Have you ever received a massage
 when Mr. Epstein was in the room other than
 just to come in to give you a message or ask
 you a question?

MR. PAGLIUCA: Object to the form
 and foundation.

A. Not that I recall.

Q. Did you ever participate in
 arranging for anyone to give Mr. Epstein a
 massage?

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A. Part of my duties and my job -- can
 you repeat the question so I understand, and
 I give you the right answer exactly.

Q. Did you ever participate in
 arranging for anyone to give Mr. Epstein a
 massage?

A. Part of my professional
 responsibilities, I did, and I've testified
 previously, go to spas and other professional
 areas and received massages from people in
 these places, and if I felt that person was
 good or I had had a good massage, I had asked
 if they do home visits.

In that capacity, I had, people did
 come to the house in that capacity, that I
 thought were good.

Q. Did you ever arrange for anyone to
 give Mr. Epstein a massage or to come to his
 home to give him a massage, other than
 someone who had previously given you a
 massage?

A. Sorry, can you repeat the question?

Q. Did you ever arrange for anyone to
 give Mr. Epstein a massage or to come to his

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home to give him a massage, other than
 someone who had previously given you a
 massage?

A. No, I don't think so. No, I don't
 think so.

Q. Is it your testimony that everyone
 that you arranged to come to Mr. Epstein's
 home to give Mr. Epstein a massage was
 somebody you had already had a massage from?

A. No, that is not my testimony. I
 don't recall -- there were definitely
 instances where I had a massage and -- so
 what you are asking me was if anyone came to
 the house to give him a massage that I had
 not had a massage from myself?

Q. It's a little different than that.

A. Okay.

Q. You've testified that you arranged
 for some people to come to Mr. Epstein's home
 to give him a massage, correct?

A. Yes.

Q. And at one point, I thought you had
 testified that before you arranged to have
 people come to give Mr. Epstein a massage,

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you had -- you didn't use the word tested
 them out, but that you had previously gotten
 them to give you a massage so that you could
 see how good they were, is that fair to say?

A. If I thought they were -- if I
 thought it was a good massage, yes, that is
 my testimony.

Q. What I had thought, and what I'm
 now asking you is that everyone who you
 arranged to come to Mr. Epstein's home to
 give him a massage was somebody who you had
 already had a massage from, is that fair?

A. Typically, yes, but that wasn't
 exclusively. So I know that friends of mine,
 for instance, would have a masseuse or
 masseur that they thought was very good, and
 they said this is a very good person.

So it is possible, and I'm pretty
 sure sometimes on recommendations of other
 people, that without me having a massage from
 them, that they may have come to the house.
 So I could not testify that every single
 person that came to the house I received a
 massage from, because that would not be true.

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2 Q. Was every person who you arranged
3 to come to Mr. Epstein's house to give a
4 massage someone who either you had already
5 had a massage from or you had a friend who
6 recommended them as a good professional
7 masseuse?

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

10 A. Typically, that is how that would
11 work.

12 Q. Was there ever anyone who you
13 arranged to come to Mr. Epstein's house to
14 give him a massage, someone who you had not
15 previously gotten a massage from yourself or
16 received a recommendation from one of your
17 friends that it was a good professional
18 masseuse?

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

21 A. I cannot think of anyone that would
22 fit that category.

23 Q. You made a point in a previous
24 answer of referring to people as adult
25 masseuses. Do you recall that?

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2 A. I do.

3 Q. When you refer to someone as an
4 adult masseuse, what are you referring to?

5 A. I think everybody in this room is
6 an adult.

7 Q. I don't necessarily disagree with
8 that, but what I'm asking you, since I can't
9 carry all these people with me every time
10 somebody reads this transcript, is what do
11 you mean by an adult?

12 A. Well, I think an adult is somebody
13 who looks older and professional and is
14 someone who has lived some life and looks
15 like any one of us in this room do, some a
16 little older and some a little younger.

17 Q. You are aware that there are
18 assertions that Mr. Epstein had massages from
19 females under the age of 21?

20 A. I am aware of that.

21 Q. Insofar as you are aware, did
22 Mr. Epstein ever have a massage from anyone
23 under the age of 21?

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

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2 A. I know what the allegations are,
3 and I am aware of those, but as to my actual
4 knowledge of somebody under the age of 21, I
5 can't say that I know, I can't think of
6 anybody. I know Virginia has obviously made
7 those claims and she was 17 when he met her,
8 but other than her, I cannot think of
9 anybody.

10 Q. Insofar as you are aware, did
11 Virginia ever give Mr. Epstein a massage?

12 A. I know she said she did and I
13 believe she may have, but I don't ever see
14 her giving him a massage, so I can't say.

15 Q. Leaving aside any information that
16 you have that has come from Virginia in the
17 last decade?

18 A. Right.

19 Q. Going back to the time when
20 Virginia was less than 21, at that period of
21 time, did you believe that Virginia was
22 giving Mr. Epstein massages?

23 A. I do think she was giving him
24 massages.

25 Q. Is it your testimony that the only

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2 female that you had any reason to believe was
3 under 21 who was giving Mr. Epstein massages
4 was Virginia?

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

7 A. First of all, I didn't know how old
8 Virginia was, so other than Virginia, so I
9 can't say, but other than -- I was not aware
10 of anybody else, no.

11 Q. You first met Virginia when?

12 A. I don't know.

13 Q. Approximately?

14 A. I believe it was in 2000, but now
15 I'm going off the knowledge that I have, not
16 from memory, so I met her the end of 2000
17 apparently.

18 Q. And when you met Virginia in 2000,
19 how old did you think she was?

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

22 A. I didn't think about how old she
23 was. I don't recall the actual meeting of
24 Virginia, so I can't say, but I think she was
25 at least, I thought she was a professional

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 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.

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 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

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 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?

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 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

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

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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

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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?

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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.

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2 MR. PAGLIUCA: Why don't we both
3 stop making speeches.

4 BY MR. BOIES:

5 [REDACTED]

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[REDACTED]

[REDACTED]

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Epstein's home in Palm Beach?
MR. PAGLIUCA: Objection to form
and foundation.

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MR. PAGLIUCA: Objection to form
and foundation.

A. [REDACTED]

[REDACTED]

MR. PAGLIUCA: Objection to form
and foundation.

A. [REDACTED]

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MR. PAGLIUCA: Objection to form
and foundation.

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Q. You were aware of how many people gave Mr. Epstein massages?

MR. PAGLIUCA: Objection to form and foundation.

A. I was not with him actually very often. I was frequently -- we were frequently not together, so I couldn't know what he would be doing when I wasn't with him.

But when we were together, the behavior as described as alleged did not happen, so he would have one massage a day, that would be it.

Q. So insofar as you were aware and when you were with Mr. Epstein, he only had one massage a day?

A. Yeah.

Q. Other than Virginia Roberts, as you understood it at the time, were any of the people that gave Mr. Epstein massages women who were under 21?

MR. PAGLIUCA: Objection to form and foundation.

A. I don't know what the ages were of

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the people who were giving him massages, but I believe they were professional masseuses.

Q. I think you testified that you believe that Virginia Roberts was a professional masseuse, is that correct?

MR. PAGLIUCA: Objection to form and foundation.

A. Based on how allegedly we met, which was at a spa, I believe that when you work at a spa, you are a professional. So I'm basing my statement based on her working as a professional massage person, at a professional spa.

Q. When you met Ms. Roberts at the spa, what spa was it?

MR. PAGLIUCA: Objection to form and foundation.

A. I don't recall the actual meeting, but based on all the evidence and stories, it was at Mar-a-Lago.

Q. You just testified that you met Virginia Roberts at a spa. Do you recall that?

MR. PAGLIUCA: Objection to form

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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

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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

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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

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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

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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?

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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

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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

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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?

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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> |
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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, 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>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 20.s, 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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| <p>1 G. Maxwell - Confidential</p> <p>2 Johanna?</p> <p>3 A. I would not know. I would say no.</p> <p>4 Q. Did you engage in sexual activities</p> <p>5 with Johanna?</p> <p>6 A. No.</p> <p>7 Q. Do you know how Johanna came to</p> <p>8 know Mr. Epstein?</p> <p>9 A. I met her at her university and she</p> <p>10 came to answer phones.</p> <p>11 Q. When you say she came to answer</p> <p>12 phones, where?</p> <p>13 A. In Palm Beach.</p> <p>14 Q. At Mr. Epstein's home in Palm</p> <p>15 Beach?</p> <p>16 A. Yes.</p> <p>17 Q. So is it fair to say that Johanna</p> <p>18 was initially hired to answer telephones,</p> <p>19 according to your testimony?</p> <p>20 MR. PAGLIUCA: This has already</p> <p>21 been testified to Mr. Boies. We are</p> <p>22 repeating testimony now.</p> <p>23 MR. BOIES: I think in the context</p> <p>24 of the witness' answers, these are fair</p> <p>25 questions.</p> | <p>1 G. Maxwell - Confidential</p> <p>2 instructed that the right way to do it</p> <p>3 was to bring any issue to him after the</p> <p>4 conclusion of the deposition.</p> <p>5 The question that has been raised</p> <p>6 is whether we should interrupt the</p> <p>7 deposition now and seek guidance of the</p> <p>8 court before continuing the deposition.</p> <p>9 My view is that the deposition</p> <p>10 needs to continue, and the counsel for</p> <p>11 the defendant can instruct not to answer</p> <p>12 and any questions that are instructed</p> <p>13 not to answer can be brought to the</p> <p>14 court, but I would not consent to</p> <p>15 terminating the deposition at this</p> <p>16 point.</p> <p>17 MR. PAGLIUCA: I don't know if it's</p> <p>18 a matter of consent or not. If I move</p> <p>19 for a protective order, the deposition</p> <p>20 is over and we can go litigate it in</p> <p>21 front of Judge Sweet. We are here and</p> <p>22 I'd like to complete this deposition</p> <p>23 because this case needs to move along,</p> <p>24 and quite frankly, I don't want to spend</p> <p>25 money coming back here to do this again</p> |
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| <p>1 G. Maxwell - Confidential</p> <p>2 Now, I've asked you before, if you</p> <p>3 want to instruct her not to answer, if</p> <p>4 you want to go to the judge, we are</p> <p>5 happy to do that, but I would suggest,</p> <p>6 in the interest of moving it along, that</p> <p>7 you stop these speeches.</p> <p>8 MR. PAGLIUCA: You are not moving</p> <p>9 it along is the problem, so maybe we</p> <p>10 should call the court and get some</p> <p>11 direction here, because I am not going</p> <p>12 to sit here and rehash the testimony we</p> <p>13 already gave.</p> <p>14 MR. BOIES: That's fine.</p> <p>15 THE VIDEOGRAPHER: The time is</p> <p>16 10:51 a.m. and we are going off the</p> <p>17 record.</p> <p>18 (Whereupon, an off-the-record</p> <p>19 discussion was held.)</p> <p>20 THE VIDEOGRAPHER: The time is</p> <p>21 10:56 a.m. and we are going back on the</p> <p>22 record. This begins DVD No. 3.</p> <p>23 MR. BOIES: We have just had a call</p> <p>24 with Judge Sweet's chambers, Judge Sweet</p> <p>25 is not available and his chambers</p> | <p>1 G. Maxwell - Confidential</p> <p>2 or argue this in front of Judge Sweet.</p> <p>3 But I will simply start referring</p> <p>4 you back to the transcript and</p> <p>5 instructing the witness not to answer</p> <p>6 when I think we are getting into some</p> <p>7 things that have been asked and answered</p> <p>8 already.</p> <p>9 MR. BOIES: Exactly the procedure</p> <p>10 that I have proposed from the beginning.</p> <p>11 If you think a question is out of</p> <p>12 bounds, instruct not to answer and we</p> <p>13 will then let the judge decide it.</p> <p>14 BY MR. BOIES:</p> <p>15 Q. How did it happen, Ms. Maxwell,</p> <p>16 that Johanna, who had been hired to answer</p> <p>17 the phones, ended up giving massages to you</p> <p>18 and Mr. Epstein?</p> <p>19 MR. PAGLIUCA: I'm going to</p> <p>20 instruct you not to answer the question.</p> <p>21 This has been previously, the subject of</p> <p>22 your former deposition, it doesn't fall</p> <p>23 into any of the categories ordered by</p> <p>24 the court, and so you don't need to</p> <p>25 answer that.</p> |

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 2 Q. Was Johanna paid for the massages
 3 that she gave you?
 4 A. I didn't pay her, so I believe she
 5 was paid.
 6 Q. Who paid her?
 7 A. I don't know who paid her.
 8 MR. PAGLIUCA: Again, you've
 9 already answered that there was no
 10 sexual activity between yourself and
 11 Mr. Epstein related to these massages.
 12 That's record testimony today. That's
 13 within the scope of the court's order.
 14 The rest of this is outside the scope of
 15 the court's order, and I instruct you
 16 not to answer.
 17 MR. BOIES: You are taking the
 18 position that as long as she said says
 19 that a massage did not involve sexual
 20 activity, we cannot ask about massages.
 21 That's your view?
 22 MR. PAGLIUCA: On this particular
 23 questioning, yes.
 24 BY MR. BOIES:
 25 Q. Did Mr. Epstein pay Johanna for the

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 2 massages that she gave Mr. Epstein?
 3 MR. PAGLIUCA: You just asked this
 4 question, and I told her not to answer.
 5 I will tell her not to answer again for
 6 the same reasons.
 7 Q. Do you know how much Mr. Epstein
 8 paid Johanna to give massages?
 9 MR. PAGLIUCA: Same instruction to
 10 the witness. Why do you believe this is
 11 within the scope of the court's order?
 12 MR. BOIES: Because of the court's
 13 reference to massages, and because I
 14 think how much a girl who was hired to
 15 answer the phone was paid to give a
 16 "massage" goes to whether there actually
 17 was or was not sexual activity involved.
 18 MR. PAGLIUCA: The witness has
 19 testified there wasn't.
 20 MR. BOIES: Perhaps it will
 21 surprise you, I think it should not,
 22 that I do not believe in my deposition I
 23 need to simply accept her
 24 characterization without
 25 cross-examination. Now, that's

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 2 something the judge can decide, but a
 3 question as to how much this young girl
 4 was being paid for a "massage", I think
 5 goes directly to the issue of sexual
 6 activity.
 7 MR. PAGLIUCA: Here is the problem,
 8 Mr. Boies, at the first deposition,
 9 there were very limited instructions not
 10 to answer and the witness was not told
 11 not to answer questions about how much
 12 people were paid or not paid or any of
 13 those subject matters. The witness was
 14 only instructed not to answer about
 15 sexual activity concerning adults in the
 16 home.
 17 None of this came up during the
 18 deposition, and you just don't get a
 19 chance to redo the deposition because
 20 you feel like you want to.
 21 So the judge's order is in the
 22 context of the instructions to the
 23 witness not to answer in the first
 24 deposition, which is simply sexual
 25 activity involving adults, which was the

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 2 only area that the witness was precluded
 3 from talking about in the first
 4 deposition. So that's where we're at.
 5 MR. BOIES: I think that directly
 6 misreads the judge's order, including
 7 where it says: Defendant is ordered to
 8 answer questions relating to defendant's
 9 own sexual activity with or involving
 10 Jeffrey Epstein, with or involving
 11 plaintiff, with or involving underage
 12 females, involving or including massage
 13 with individuals defendant knew to be or
 14 believed might become known to Epstein.
 15 MR. PAGLIUCA: All of it is
 16 preceded by the word sexual activity.
 17 MR. BOIES: I think your point of
 18 view is an interesting one, but we will
 19 see what the judge rules on it.

BY MR. BOIES:

21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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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]

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2 [REDACTED]

1 G. Maxwell - Confidential
2 [REDACTED]

1 G. Maxwell - Confidential
2 [REDACTED]

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

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2 [REDACTED]

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2 [REDACTED]

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2 it to something in the case.

3 MR. BOIES: I think it's tied, but
4 if you instruct her not to answer, it
5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]

14 A. Can you repeat the question?

15 Q. [REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [REDACTED]

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25 Q. Do you know the reporter by the

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 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

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 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

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 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?

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 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.

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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> |
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| <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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2 MR. BOIES: You want a break to
3 talk to your counsel, right?

4 THE WITNESS: I want to use the
5 bathroom.

6 MR. BOIES: You want to talk to
7 your counsel, right?

8 THE WITNESS: I talk to my counsel
9 all the time.

10 MR. BOIES: I don't want you
11 talking to your counsel while I'm in the
12 middle of this examination.

13 MR. PAGLIUCA: I'm going to talk to
14 her, so are we going to sit here and go
15 for the rest of the day until we're
16 done?

17 MR. BOIES: No, but I'm going to go
18 through the rest of this line of
19 questioning, unless you take her and
20 walk out and then, I'm going to protest
21 that to the judge.

22 MR. PAGLIUCA: He is refusing a
23 bathroom break to you right now.

24 MR. BOIES: No, I'm not. I'm happy
25 to have her take a bathroom break as

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2 long as she doesn't use it as an excuse
3 to get coached by her lawyer.

4 THE WITNESS: For the record, I
5 want to object strongly to that.

6 MR. PAGLIUCA: You don't talk now.
7 Do you want to go to the bathroom?

8 THE WITNESS: Yes.

9 MR. PAGLIUCA: How about if I stay
10 here, Mr. Boies, will that work for you?

11 MR. BOIES: Absolutely.

12 THE VIDEOGRAPHER: The time is
13 11:31, and we are going off the record.

14 (Recess.)

15 THE VIDEOGRAPHER: The time is
16 11:34 a.m. and we are back on the
17 record. This also begins DVD No. 4.

18 BY MR. BOIES:

19 Q. Let me approach it this way. If
20 you turn to page 5 of 7 of the exhibit that
21 is Vicky Ward's Daily Beast article. And if
22 you look at the third paragraph where Ms.
23 Ward writes: What I had "on the girls" were
24 some remarkably brave first-person accounts.
25 Three on-the-record stories from the family,

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2 a mother and her daughters who came from
3 Phoenix. The oldest daughter, an artist,
4 whose character was vouchsafed to me by
5 several sources, including the artist, Eric
6 Fischl, had told me weeping as she sat in my
7 living room, of how Epstein had attempted to
8 seduce both her and separately and her
9 younger sister, then only 16."

10 Did Ms. Ward tell you that?

11 A. No.

12 Q. Did Ms. Ward tell you that her
13 information was that Mr. Epstein had
14 attempted to seduce both Maria and Annie
15 Farmer?

16 A. No.

17 Q. Did you and Mr. Epstein visit Maria
18 Farmer in Ohio?

19 A. I don't know I would characterize
20 the word visit with Mr. Epstein. We went for
21 business in Ohio because he worked with
22 Mr. Wexner, and I accompanied him on a few
23 visits.

24 Q. Did you and Mr. Epstein go to Ohio,
25 and while you were in Ohio, see Maria Farmer?

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2 A. I believe actually that she was --
3 stayed at his house there, so I would have
4 seen her at the house. I believe I do recall
5 seeing her at the house, actually.

6 Q. When you say she stayed at the
7 house, you are referring to Maria Farmer?

8 A. Yeah, I think Maria Farmer was
9 painting or something in Ohio, and he let her
10 stay at a place that he had.

11 Q. When you say "he" let her stay, you
12 are talking about Les Wexner?

13 A. No, I'm talking about Jeffrey
14 Epstein.

15 Q. So when you saw Maria Farmer in
16 Ohio, it was your understanding that she was
17 staying at property that Mr. Epstein had in
18 Ohio, is that correct?

19 A. I don't know if it was his property
20 or he rented it, I don't know what the nature
21 was. It was a property that he had that she
22 stayed at.

23 Q. Maria Farmer was staying in Ohio at
24 some property, and you don't know whose
25 property it was, is that fair?

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 A. I don't know what -- I don't know who owned -- I don't know anything about the ownership of the property or how Jeffrey had it or why he stayed there, I don't know.

Q. Was it clear to you that Jeffrey had arranged for Maria Farmer to stay at wherever she was staying in Ohio?

MR. PAGLIUCA: Objection to form and foundation.

A. I have no idea what the arrangement was between Maria Farmer and Jeffrey.

Q. When you referred to the property where Maria Farmer was staying, you said you didn't know how Jeffrey had it?

A. What's your question?

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

MR. PAGLIUCA: Objection to form and foundation.

A. I have no idea.

Q. Where was this property that you

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 house in Columbus, Ohio, correct?

A. I don't know the arrangement that Maria Farmer had with Jeffrey. I believe she was painting there, but I was never aware of the arrangement. I know that I saw her in Ohio at a house.

Q. When you were with Maria Farmer at this house in Columbus, Ohio, Mr. Epstein was with you, correct?

A. I went to Ohio with him on business, and we were at a house that he could stay at and I stayed at, and I recall Maria Farmer being at this house. That is what I recall.

Q. When you went to Ohio with Mr. Epstein, did you see Maria Farmer on more than one occasion?

A. I don't recall.

Q. You saw Maria Farmer in Ohio with Mr. Epstein on at least one occasion, correct?

MR. PAGLIUCA: Objection to form and foundation.

A. I recall seeing her in Ohio, but I

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 and Mr. Epstein visited Maria Farmer at in Ohio?

MR. PAGLIUCA: Objection to form and foundation.

A. It was in Columbus.

Q. Was it a house or an apartment?

A. It was a house.

Q. When you and Mr. Epstein visited Maria Farmer at this house in Columbus, was anyone else in the house?

A. I never visited Maria Farmer at the house.

Q. Did you see Maria Farmer in Ohio?

A. I recall seeing her, but I didn't visit. I didn't go to Ohio to see Maria Farmer.

Q. When you went to Ohio, did you see Maria Farmer?

A. I recall seeing Maria Farmer in Ohio.

Q. Where did you see her?

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

Q. Maria Farmer was staying in the

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 couldn't tell you how many times I saw her. For sure once, because I have a recollection of seeing her once.

Q. And the house in which you and Mr. Epstein and Maria Farmer were in Columbus, Ohio, was that a house that you and Mr. Epstein were staying in overnight?

A. I stayed overnight there.

Q. Was Maria Farmer staying there overnight?

A. I don't recall.

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

A. I don't recall.

Q. Was it more than one?

A. I don't recall.

Q. The night or nights that you and Mr. Epstein stayed at this house in Columbus, was Maria Farmer there?

A. I don't recall.

Q. When you saw Maria Farmer in Ohio, did you talk to her?

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

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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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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

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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

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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

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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

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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

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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

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

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1 G. Maxwell - Confidential
 2 Q. Is she anyone with whom Mr. Epstein
 3 had sex?
 4 MR. PAGLIUCA: Objection to form
 5 and foundation.
 6 A. I have no idea.
 7 Q. Is she anyone with whom Mr. Epstein
 8 engaged in sexual activities?
 9 MR. PAGLIUCA: Objection to form
 10 and foundation.
 11 A. I have no personal knowledge.
 12 Q. When you say you have no personal
 13 knowledge, what do you mean by personal
 14 knowledge?
 15 A. I mean that I've read the police
 16 reports, so that's the only knowledge I have
 17 of what 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?

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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,

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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?

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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?

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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

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1 G. Maxwell - Confidential
 2 Mr. Epstein?
 3 A. I believe she did.
 4 Q. Was she working for Mr. Epstein in
 5 2003?
 6 A. I believe she was.
 7 Q. What was her job?
 8 A. I don't exactly know what her job,
 9 her responsibilities were.
 10 Q. Do you know any of job
 11 responsibilities?
 12 A. I believe she traveled with him and
 13 help managed the houses and run the staff and
 14 whatever else he asked her to do. She worked
 15 for Mr. Epstein, so you would have to ask
 16 him.
 17 Q. Was it your understanding that
 18 Sarah Kellen Vickers at some point had had a
 19 sexual or romantic relationship with
 20 Mr. Epstein?
 21 A. I have no knowledge of that.
 22 Q. Let me go back to Nadia Marcinkova.
 23 Did you know, yourself, Nadia Marcinkova?
 24 A. I met her.
 25 Q. Where did you meet her?

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1 G. Maxwell - Confidential
 2 A. I don't recall where I met her, I
 3 just don't.
 4 Q. Did you meet her at one of
 5 Mr. Epstein's properties?
 6 A. It's possible, but I don't recall
 7 where I met her.
 8 Q. Did you ever see Nadia at any of
 9 Mr. Epstein's properties?
 10 A. I believe that -- I believe on the
 11 island, I recall, maybe.
 12 Q. Virgin Islands?
 13 A. Virgin Islands.
 14 Q. Did Nadia work for Mr. Epstein?
 15 A. I don't know.
 16 Q. Did Nadia travel with Mr. Epstein?
 17 A. I don't know. If she was on the
 18 island, then presumably she did. I don't
 19 recall.
 20 Q. Did you ever see Nadia Marcinkova
 21 at any of Mr. Epstein's properties other than
 22 in the Virgin Islands?
 23 A. Not that I recall.
 24 Q. Leaving aside anything that you
 25 have learned since this defamation suit

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1 G. Maxwell - Confidential
 2 started, did you have any reason to believe
 3 that Mr. Epstein had engaged in sexual
 4 activities with Nadia Marcinkova?
 5 MR. PAGLIUCA: Objection to form
 6 and foundation.
 7 A. I don't -- I have no idea. It
 8 wouldn't be something I think about.
 9 Q. I'm sorry, say that again?
 10 A. I would have no idea.
 11 Q. Did Nadia Marcinkova, insofar as
 12 you were aware, ever give Mr. Epstein a
 13 massage?
 14 A. I have no idea.
 15 Q. Did you ever see her go into the
 16 massage room?
 17 A. Not that I recall, no.
 18 Q. Did you ever tell Nadia Marcinkova
 19 that Mr. Epstein wanted her in the massage
 20 room?
 21 A. No.
 22 Q. Did you ever have any discussions
 23 with Mr. Epstein about Nadia Marcinkova?
 24 A. None.
 25 Q. Did you ever have any discussions

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1 G. Maxwell - Confidential
 2 with Nadia Marcinkova about Mr. Epstein?
 3 A. None.
 4 Q. Do you know how much money, if any,
 5 Mr. Epstein paid Nadia Marcinkova?
 6 A. I have no idea, no, I have no idea.
 7 Q. Do you know whether Mr. Epstein
 8 paid Nadia Marcinkova, even if you don't know
 9 the amount?
 10 A. No, I would not know that.
 11 Actually, I don't, I don't recall any
 12 conversation --
 13 MR. PAGLIUCA: There is no question
 14 pending.
 15 Q. Do you know who Alfredo Rodriguez
 16 is?
 17 A. Yes.
 18 Q. Would you identify him for the
 19 record?
 20 A. He is dead.
 21 Q. Before he died?
 22 A. He was a butler.
 23 Q. A butler for whom?
 24 A. Mr. Epstein in Palm Beach.
 25 Q. And was he a butler for Mr. Epstein

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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?

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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.

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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.

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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

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1 G. Maxwell - Confidential</p> <p>2 this. You don't need to testify about</p> <p>3 this again. We will take it up with the</p> <p>4 judge, if we need to. I let this go on</p> <p>5 for 15 minutes about Palm Beach.</p> <p>6 MR. BOIES: I ask the question, you</p> <p>7 give the instruction, the judge decides.</p> <p>8 Q. In 2005, were you assisting in the</p> <p>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</p> <p>14 take a lunch break.</p> <p>15 MR. PAGLIUCA: Okay. I don't</p> <p>16 intend on being here all day, so if you</p> <p>17 have some important questions you want</p> <p>18 to ask, you may want to get to those.</p> <p>19 MR. BOIES: You can walk out any</p> <p>20 time you want.</p> <p>21 MR. PAGLIUCA: We are getting</p> <p>22 close.</p> <p>23 MR. BOIES: The judge will decide</p> <p>24 whether that's appropriate or not.</p> <p>25 MR. PAGLIUCA: We are getting</p> | <p>1 G. Maxwell - Confidential</p> <p>2 AFTERNOON SESSION</p> <p>3 (Time noted: 1:16 p.m.)</p> <p>4</p> <p>5 GHISLAINE MAXWELL,</p> <p>6 resumed and testified as follows:</p> <p>7</p> <p>8 THE VIDEOGRAPHER: The time is 1:16</p> <p>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</p> <p>12 matter before you get started. The</p> <p>13 original deposition was as confidential</p> <p>14 and we would designate this continued</p> <p>15 deposition as confidential as well.</p> <p>16 MR. BOIES: Okay.</p> <p>17 Let me ask you to look at a</p> <p>18 document that has been marked as Maxwell</p> <p>19 Deposition Exhibit 28. This is another</p> <p>20 list of names.</p> <p>21 (Maxwell Exhibit 28, List of names,</p> <p>22 marked for identification, as of this</p> <p>23 date.)</p> <p>24 Q. What I would ask you to do is to</p> <p>25 identify the names that are here that you do</p> |
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| <p>1 G. Maxwell - Confidential</p> <p>2 close.</p> <p>3 THE VIDEOGRAPHER: It's 12:15 p.m.</p> <p>4 and we are going off the record.</p> <p>5 (Whereupon, a luncheon recess was</p> <p>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</p> <p>2 not recognize. That is, I think you will</p> <p>3 recognize most of the names --</p> <p>4 MR. POTTINGER: Excuse me one</p> <p>5 second.</p> <p>6 Q. What I was saying was that I would</p> <p>7 like you to look at the names here and tell</p> <p>8 me which names you do not recognize.</p> <p>9 A. I pretty much recognize these</p> <p>10 names. I don't know everybody very well, but</p> <p>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</p> <p>14 are. I recognize the names.</p> <p>15 Q. Are most of the people on this list</p> <p>16 people that you've met before?</p> <p>17 MR. PAGLIUCA: Objection to form</p> <p>18 and foundation.</p> <p>19 A. I believe I've met pretty much</p> <p>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</p> <p>24 people that at one time or another you were</p> <p>25 with with Mr. Epstein?</p> |

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

4 A. I believe so.

5 Q. Were any of these people on the
6 list, obviously leaving aside Mr. Epstein
7 himself, people who, to your knowledge,
8 received massages at one or more of Mr.
9 Epstein's properties?

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

12 A. I couldn't say.

13 Q. Are there any people on this list
14 who you have reason to believe received
15 massages at one or more of Mr. Epstein's
16 properties?

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

19 A. I couldn't say.

20 Q. Just to be clear, my most recent
21 question is whether any of the people on this
22 list are people who you have reason to
23 believe received massages at one of Mr.
24 Epstein's properties?

25 MR. PAGLIUCA: Same objection.

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2 A. I couldn't say.

3 Q. Why can't you say?

4 A. Because I just don't know.

5 Q. Well, you know whether you have a
6 reason to believe, correct?

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

9 A. These are events that took place 17
10 years ago, and I really do not know. It is
11 possible that people on that list got a
12 massage, it's also possible they didn't. I
13 really don't know, leaving aside, of course,
14 Mr. Epstein himself.

15 Q. Yes.

16 MR. PAGLIUCA: One second, I'm
17 getting text messages.

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 Q. Are there any names on this list
23 that you have reason to believe Mr. Epstein
24 engaged in sexual activities with?

25 MR. PAGLIUCA: Objection to form

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2 and foundation.

3 A. Eva Anderson was his girlfriend.

4 Q. I am sorry?

5 A. Eva Anderson was his girlfriend.

6 Q. When was Eva Anderson Mr. Epstein's
7 girlfriend?

8 A. I don't know the dates, but I
9 believe in the '80s.

10 Q. In the 1980s?

11 A. Yeah, and part of the 1990s, I
12 believe. So I don't know when they started
13 and when they ended. They were in a
14 long-term relationship.

15 Q. Was Mr. Epstein engaged in sexual
16 activities with Eva Anderson during the
17 period of time that you were involved with
18 Mr. Epstein?

19 A. I wouldn't know.

20 Q. How old was Eva Anderson when she
21 was first involved with Mr. Epstein?

22 A. I don't know.

23 Q. How old was Eva Anderson when you
24 first met her?

25 A. I don't recall.

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2 Q. Did any of the people on this list,
3 other than Mr. Epstein himself, and the list
4 is Exhibit 28, ever ask you to arrange a
5 massage?

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

8 A. Not that I recall.

9 Q. Did you arrange a massage for any
10 of the people on this list other than
11 Mr. Epstein?

12 A. Not that I recall.

13 Q. Were any of the people on this
14 list, other than Mr. Epstein, given a massage
15 at any of Mr. Epstein's residences?

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

18 A. I wouldn't know.

19 Q. Did any of the people on this list,
20 other than Mr. Epstein, engage in sexual
21 activities with anyone at Mr. Epstein's
22 properties?

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

25 A. I wouldn't know.

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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 [REDACTED]

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2 A. I don't recall saying that.

3 Q. Do you deny saying that, or do you
 4 simply say you don't recall, one way or
 5 another, whether you said it?

6 MR. PAGLIUCA: This is outside the
 7 court's order, so I will tell you not to
 8 answer this, and we will take it up with
 9 the judge.

10 [REDACTED]

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 2 [REDACTED]

[REDACTED]

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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]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [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]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [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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 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

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 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

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 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?

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 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.

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2 Q. Did you ever arrange for anyone to
3 give Mr. Epstein a massage at his Virgin
4 Island property?

5 A. I don't recall if I ever made a
6 call to the massage people in St. Thomas. I
7 don't recall.

8 Q. Did Mr. Epstein ever receive
9 massages at his Virgin Island property from
10 people that he had brought with him on his
11 plane from the United States?

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

14 A. I don't know.

15 Q. Did you ever participate in
16 arranging for a massage for Mr. Epstein by
17 someone who had been brought to the island on
18 Mr. Epstein's plane?

19 A. My memory of the massages on the
20 island were from people who came from St.
21 Thomas.

22 Q. Does that mean that you never
23 participated in arranging for a massage for
24 Mr. Epstein at his Virgin Island property to
25 be given by someone who had been brought to

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2 A. It was a cabana, and also he had a
3 beach place, a place on the beach where from
4 time to time he would...

5 Q. Did you ever see Mr. Epstein being
6 given a massage in the beach area where he
7 from time to time had massages?

8 A. I don't have any recollection of a
9 specific memory, but it was just on the
10 beach, so there wouldn't be any privacy, he
11 would just be getting a massage.

12 Q. That would be visible to people who
13 are on the beach, correct?

14 A. It would be, yes.

15 Q. Did you, at any time when you were
16 there, see Mr. Epstein being given a massage
17 in this beach area other than by a
18 professional masseuse brought to the island
19 from St. Thomas?

20 A. I don't have any memory of -- I
21 don't have a specific memory of seeing him
22 get a massage on the beach. I just have an
23 image of a massage on the beach, so I don't
24 know who, I have no memory of it.

25 Q. Whether or not you have a specific

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2 the island on Mr. Epstein's plane?

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

5 A. I don't recall, I have no idea.

6 Q. Mr. Epstein did bring women to his
7 Virgin Island property on his plane from time
8 to time, right?

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

11 A. People came to the island who were
12 his guests.

13 Q. And some of those guests, as you
14 described it, were women, right?

15 A. Indeed.

16 Q. Did you ever participate in
17 arranging for any of the women that came to
18 Mr. Epstein's Virgin Island property to
19 provide Mr. Epstein with a massage?

20 A. No.

21 Q. Where on the Virgin Island property
22 did Mr. Epstein have his massages?

23 A. I believe from memory he had them
24 in the master cabana.

25 Q. In what?

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2 memory of it, do you have a general memory
3 that from time to time Mr. Epstein got
4 massages down in the beach area?

5 A. I have a general memory, I do.

6 Q. Do you have a general memory that
7 from time to time those massages were given
8 to Mr. Epstein by people other than a
9 professional masseuse brought to the island
10 from St. Thomas?

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

13 A. I have no idea who would be giving
14 him a massage in that general memory of mine,
15 so I can't say. The massages that I recall
16 were from people from St. Thomas, and that's
17 what I recall.

18 Q. Did anyone ever complain to you
19 that Mr. Epstein had demanded sex of them?

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

22 A. Is that a question?

23 Q. Yes.

24 A. Never.

25 Q. Do you know somebody named Reynaldo

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 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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 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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 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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 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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 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?

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 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.

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 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

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 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.

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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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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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2 [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, [REDACTED].
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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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

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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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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

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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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2 MR. PAGLIUCA: Is there a rule that
3 you can point me to that mandates that
4 you get to control the time and place of
5 breaks?

6 MR. BOIES: No. We will take a
7 break now, because if what you are going
8 to do is say, you said at the very
9 beginning of this thing that you wanted
10 to have a rule that every hour we took a
11 break, and I said that was fine with me,
12 but I just didn't want you taking a
13 break, particularly since you reserve
14 the right to talk to your client during
15 breaks, in the middle of an examination.

16 Now you are saying let's continue
17 for a while but I am not agreeing to
18 continue for the next hour. We will
19 take a break, and we will come back and
20 we will go from there.

21 MR. PAGLIUCA: We will take a break
22 at your request now, and then if I want
23 to take a break, we will take another
24 break.

25 MR. BOIES: If you take a break to

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2 Q. I would like to go down those names
3 and see if any of those people are people
4 that you recognize. However you think is
5 best, we can go name by name, or you can tell
6 me which ones you recognize and which ones
7 you don't.

8 A. I recognize Sherrie. I recognize
9 Allison Chambers. Caroline Casey. These are
10 names that ring bells, nothing else.

11 Dara. I recognize the name.

12 Q. Where is Dara?

13 A. Dara Preece. I just recognize
14 these names. It doesn't mean anything else.
15 I'm just recognizing names.

16 Gwendolyn Beck.

17 Let me do it again and make sure I
18 didn't miss anyone. That's it.

19 Q. Now, with respect to the people
20 that you say you recognized the names of,
21 Sherrie Lynch, Allison chambers, Caroline
22 Casey, Dara Preece and Gwendolyn Beck, were
23 any of those people, people who provided
24 massages to Mr. Epstein?

25 MR. PAGLIUCA: Objection to form

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2 talk to your witness, I guarantee you
3 there will be a motion for sanctions. I
4 think what you're doing with this
5 witness is inappropriate. I think your
6 instructions not to answer,
7 conversations that you had with her
8 while she is under oath and under
9 examination is inappropriate.

10 THE VIDEOGRAPHER: It's 2:18 p.m.,
11 and we are off the record.

12 (Recess.)

13 THE VIDEOGRAPHER: The time is 2:28
14 p.m. This also begins DVD No. 6.

15 BY MR. BOIES:

16 Q. Let me hand you a document that has
17 been previously marked as Maxwell Exhibit 13.
18 And I would like you to turn to page 91 of
19 that exhibit. And you see the heading that
20 says, "Massage-Florida"?

21 A. Actually, I don't -- yes, I do,
22 sorry.

23 Q. Then you see a list of telephone
24 numbers with names?

25 A. I do.

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2 and foundation.

3 A. Sorry, I guess. I believe Sherrie
4 did, and I believe -- I think that's it that
5 I know of, I think.

6 Q. Now, just going down the names of
7 people that you did not recognize, I take it
8 you are not aware or recognize the name [REDACTED]
9 first name?

10 A. It was just a first name. I can't
11 think of a [REDACTED] at this point.

12 Q. The same thing is true for [REDACTED]

13 A. I don't recognize [REDACTED]

14 Q. And [REDACTED]

15 A. I don't recognize [REDACTED]

16 Q. And Joanne?

17 A. Is that Johanna? Where is that?
18 That's Johanna, I'm sorry, I missed her.
19 That would probably be Johanna Sieberg.

20 I think [REDACTED] might have been a
21 masseuse as well. There is a [REDACTED] in the
22 back of my head.

23 Q. Amy Birse?

24 A. I don't know who that is.

25 Q. What about Melissa Hanes?

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

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

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

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

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 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

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 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.

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 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

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 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.)
 23
 24
 25

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|----------|--|-------------------------------------|---------------|---------------|-----------|----------|--|-----------------------------------------------|-----------|-----------|--|
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| 3 | | I N D E X | | | | 3 | | Questions Marked | | | |
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| 5 | | | | | | 5 | | None | | | |
| 6 | | GHISLAINE MAXWELL | | PAGE | | 6 | | --- | | | |
| 7 | | By Mr. Boies | | 4 | | 7 | | | | | |
| 8 | | | | | | 8 | | | | | |
| 9 | | --- | | | | 9 | | | | | |
| 10 | | E X H I B I T S | | | | 10 | | | | | |
| 11 | | --- | | | | 11 | | | | | |
| 12 | | EXHIBIT | | PAGE | | 12 | | | | | |
| 13 | | Exhibit 26 | List of names | 23 | | 13 | | | | | |
| 14 | | Exhibit 27 | Article | 94 | | 14 | | | | | |
| 15 | | Exhibit 28 | List of names | 135 | | 15 | | | | | |
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| 1 | | | | | | 1 | | | | | |
| 2 | | --- | | | | 2 | | CERTIFICATE | | | |
| 3 | | D E P O S I T I O N | | S U P P O R T | I N D E X | 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 | 7 | | deposition is a true record of the testimony | | | |
| 8 | | 51 | 9 | 51 | 17 | 8 | | given by the witness. | | | |
| 9 | | 52 | 2 | 81 | 17 | 9 | | | | | |
| 10 | | 82 | 25 | 83 | 7 | 10 | | | | | |
| 11 | | 95 | 6 | 98 | 12 | 11 | | | | | |
| 12 | | 142 | 6 | 142 | 13 | 12 | | Leslie Fagin, | | | |
| 13 | | 165 | 25 | 169 | 22 | 13 | | Registered Professional Reporter | | | |
| 14 | | 172 | 22 | 173 | 4 | 14 | | Dated: July 22, 2016 | | | |
| 15 | | 174 | 5 | 175 | 9 | 15 | | | | | |
| 16 | | 175 | 25 | 176 | 8 | 16 | | (The foregoing certification of | | | |
| 17 | | 186 | 23 | | | 17 | | this transcript does not apply to any | | | |
| 18 | | --- | | | | 18 | | reproduction of the same by any means, unless | | | |
| 19 | | Request for Production of Documents | | | | 19 | | under the direct control and/or supervision | | | |
| 20 | | Page Line | Page Line | Page Line | | 20 | | of the certifying reporter.) | | | |
| 21 | | None | | | | 21 | | | | | |
| 22 | | --- | | | | 22 | | | | | |
| 23 | | Stipulations | | | | 23 | | | | | |
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| 25 | | None | | | | 25 | | | | | |

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ACKNOWLEDGMENT OF DEPONENT

I, , do hereby
certify that I have read the foregoing pages,
and that the same is a correct transcription
of the answers given by me to the questions
therein propounded, except for the
corrections or changes in form or substance,
if any, noted in the attached Errata Sheet.

GHISLAINE MAXWELL DATE

Subscribed and sworn
to before me this
day of , 2016.
My commission expires:

Notary Public

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| Case | Age | Sex | Occupation | Duration of symptoms (months) | Initial symptoms | Current symptoms | Response to treatment | Follow-up (months) |
|------|-----|--------|------------|-------------------------------|--------------------------|-----------------------------------------|-----------------------|--------------------|
| 1 | 45 | Male | Teacher | 12 | Headache, dizziness | Headache, dizziness, nausea | Partial | 18 |
| 2 | 38 | Female | Homemaker | 6 | Headache, fatigue | Headache, fatigue, weight loss | No | 12 |
| 3 | 52 | Male | Engineer | 24 | Headache, blurred vision | Headache, blurred vision, double vision | Partial | 30 |
| 4 | 41 | Female | Nurse | 18 | Headache, irritability | Headache, irritability, anxiety | Partial | 24 |
| 5 | 35 | Male | Student | 3 | Headache, stress | Headache, stress, insomnia | Partial | 6 |

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| <p> 1. Introduction The purpose of this study is to investigate the effects of various factors on the performance of a specific task. The study is organized as follows: Section 2 discusses the background and motivation for the research. Section 3 describes the methodology used in the study. Section 4 presents the results of the experiments. Section 5 discusses the implications of the findings. Section 6 concludes the study and outlines future work. </p> | <p> 2. Background The background of this study is rooted in the understanding of the factors that influence human performance. Previous research has shown that factors such as motivation, fatigue, and skill level can significantly impact performance. This study aims to explore these factors in more detail and to identify ways to optimize performance. </p> | <p> 3. Methodology The methodology of this study involves a series of experiments designed to measure performance under different conditions. The participants were selected based on specific criteria and were trained in the task before the experiments began. The data collected from the experiments was analyzed using statistical methods to determine the significance of the findings. </p> | <p> 4. Results The results of the experiments show that there are significant differences in performance across the different conditions. The data indicates that certain factors, such as motivation and skill level, have a positive impact on performance, while others, such as fatigue, have a negative impact. These findings are discussed in more detail in the following sections. </p> | <p> 5. Discussion The implications of the findings of this study are far-reaching. The results suggest that there are ways to optimize performance by addressing the factors that influence it. This has important implications for fields such as sports, education, and industry, where performance is a key factor. The study also highlights the need for further research in this area. </p> |
| <p> 6. Conclusion In conclusion, this study has provided valuable insights into the factors that influence performance. The findings suggest that there are ways to optimize performance by addressing these factors. This study also highlights the need for further research in this area. </p> | <p> 7. Future Work Future work in this area should focus on identifying the specific mechanisms by which the factors identified in this study influence performance. This will involve further experiments and analysis of the data collected. </p> | <p> 8. Acknowledgments The author would like to thank the following individuals for their contributions to this study: [Names of individuals]. </p> | <p> 9. References [List of references] </p> | <p> 10. Appendix [Appendix content] </p> |

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