

EXHIBIT F

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 20, 2016
9:12 a.m.

C O N F I D E N T I A L

Deposition of [REDACTED] pursuant
to notice, taken by Plaintiff, at the
offices of Podhurst Orseck, 25 West
Flagler Street, Suite 800, Miami, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

Page 2

2

3

4 A P P E A R A N C E S:

5 BOIES SCHILLER & FLEXNER, LLP

Attorneys for Plaintiff

6 401 East Las Olas Boulevard

Fort Lauderdale, Florida 33301

7 BY: BRADLEY EDWARDS, ESQ.

8

9 HADDON MORGAN & FOREMAN, P.C.

Attorneys for Defendant

10 150 East 10th Avenue

Denver, Colorado 80203

11 BY: JEFFREY PAGLIUCA, ESQ.

12

13 PODHURST ORSECK, P.A.

Attorneys for Deponent

14 25 West Flagler Street

Suite 800

15 Miami, Florida 33130

BY: ROBERT JOSEFSBURG, ESQ.

16

17

18

19

20

21

22

23

24

25

Page 3

2

3

I N D E X

4	Examination by Mr. Edwards	4
	Examination by Mr. Pagliuca	57
5	Further Examination by Mr. Edwards	68

6

7

8

E X H I B I T S

9	Deposition Exhibit 1	6
---	----------------------------	---

Police Interview

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 [REDACTED] - CONFIDENTIAL

2 A. No, sir, I do not.

3 Q. Do you remember that the police officers
4 tape-recorded the statement with you?

5 A. Vaguely, yes.

6 Q. Do you remember how old you were when you
7 met Jeffrey Epstein?

8 A. Sixteen or 17.

9 Q. Okay. And have you reviewed --

10 A. I may have been 15. I don't recall. I
11 apologize.

12 Q. If you told the police officer 16, you
13 were telling the truth?

14 A. At the time, they were fresh.

15 MR. PAGLIUCA: Object to form and
16 foundation.

17 THE WITNESS: The facts were fresh at the
18 time. But 12 years later, I don't recall.

19 MR. PAGLIUCA: If you can just do a little
20 pause in between his question and your answer.
21 I need an opportunity to object to any form or
22 foundation problem with his question.

23 THE WITNESS: Sure.

24 MR. PAGLIUCA: It helps the court reporter
25 if the three of us are not talking at the same

1 [REDACTED] - CONFIDENTIAL

2 THE WITNESS: I do remember having several
3 conversations about Bill Clinton and others.

4 BY MR. EDWARDS:

5 Q. What do you remember saying about Bill
6 Clinton?

7 A. They went on a trip to Africa with Kevin
8 Spacey and that it really -- there was nothing
9 specific about Bill Clinton other than I think it
10 was a trip where they -- it was very vague. It was
11 implied that they enjoyed themselves, however that
12 was.

13 There were specific things said about
14 Spacey, but I cannot recall anything about Clinton.

15 Q. Okay. After speaking to the police or
16 while speaking to the police, do you remember
17 telling them that you're not safe because you're
18 talking about this?

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

21 THE WITNESS: Yes.

22 BY MR. EDWARDS:

23 Q. And that you had heard Jeffrey Epstein
24 making threats to people on the telephone?

25 MR. PAGLIUCA: Object to form and

1 [REDACTED] - CONFIDENTIAL

2 foundation.

3 THE WITNESS: Yes. He wasn't always
4 friendly.

5 BY MR. EDWARDS:

6 Q. What type of threats do you remember
7 hearing Jeffrey Epstein make to anyone?

8 A. Nothing specific. I do remember hostile
9 conversations where he was upset with people, and I
10 assumed that it was business and none of my
11 business.

12 Q. Okay. You were asked by the detectives,
13 "Things like, You're going to die; you're going to
14 break your legs." And your response was: "All of
15 the above."

16 MR. PAGLIUCA: Objection.

17 BY MR. EDWARDS:

18 Q. Do you remember those type of things?

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

21 THE WITNESS: Not specifically, no.

22 BY MR. EDWARDS:

23 Q. Do you remember where you were when you
24 heard these conversations?

25 A. Most of the time he was on the phone when

