

EXHIBIT 11

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

June 21, 2016

9:17 a.m.

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

Deposition of JOSEPH RECAREY, pursuant
to notice, taken by Plaintiff, at the
offices of Boies Schiller & Flexner, 401
Las Olas Boulevard, Fort Lauderdale, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Ghislane Maxwell?

3 A. I wanted to speak with everyone related to
4 this home, including Ms. Maxwell. My contact was
5 through Gus, Attorney Gus Fronstin, at the time, who
6 initially had told me that he would make everyone
7 available for an interview. And subsequent
8 conversations later, no one was available for
9 interview and everybody had an attorney, and I was
10 not going to be able to speak with them.

11 Q. Okay. During your investigation, what did
12 you learn in terms of Ghislane Maxwell's
13 involvement, if any?

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

16 THE WITNESS: Ms. Maxwell, during her
17 research, was found to be Epstein's long-time
18 friend. During the interviews, Ms. Maxwell was
19 involved in seeking girls to perform massages
20 and work at Epstein's home.

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

23 BY MR. EDWARDS:

24 Q. Did you interview -- how many girls did
25 you interview that were sought to give or that

1 JOSEPH RECAREY - CONFIDENTIAL

2 house for the massages?

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

5 THE WITNESS: Correct.

6 BY MR. EDWARDS:

7 Q. And, as well, certain people that were
8 friends or girlfriends or assistants of Jeffrey
9 Epstein would recruit girls under the pretense of
10 giving a massage?

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

13 THE WITNESS: Correct.

14 BY MR. EDWARDS:

15 Q. Is that what your investigation revealed
16 in terms of the system of getting these girls over
17 to the house?

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

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. Okay. Talking about the massages, when --
23 when these -- the various girls that you interviewed
24 described the massages, was there a pattern of what
25 occurred during these massages?

1 JOSEPH RECAREY - CONFIDENTIAL

2 of the -- that the house appeared to be -- I don't
3 remember the word you used -- sanitized, for lack of
4 a better word?

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

7 BY MR. EDWARDS:

8 Q. How did you know that?

9 A. The computers had been removed from the
10 home.

11 Q. How did you know the computers were
12 removed?

13 A. Based on -- based on the dangling wires
14 left behind, the monitors left, but the actual CPU
15 of it was missing.

16 When you went into the bedroom of Jeffrey
17 Epstein, everything was removed from the -- the
18 shelves, from the armoire.

19 Q. Did you find nude photographs of girls?

20 A. Yes.

21 Q. All right.

22 And what did you do with that evidence?

23 A. That was collected and placed into our
24 crime scene unit.

25 Q. And where is that evidence today?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Any evidence that was not returned to its
3 rightful owner was turned over to the FBI.

4 Q. And evidence which would be nude
5 photographs of girls would be evidence not turned
6 back over to Epstein?

7 A. Correct.

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

10 THE WITNESS: Some of the items that were
11 collected were later found to be personal items
12 of the houseman, Janush. I recall reviewing
13 his personal photographs on -- on a micro SD
14 card for, like, photos of him and his wife or
15 girlfriend at the time.

16 BY MR. EDWARDS:

17 Q. And the underaged girls that you had
18 spoken with during your investigation, had they
19 described seeing photographs of naked girls in the
20 house?

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

23 THE WITNESS: Yes, they did.

24 BY MR. EDWARDS:

25 Q. That's something that ran consistent with

1 JOSEPH RE CAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. In these messages, did you see messages
4 that were taken by Ghislane Maxwell or left for
5 Ghislane Maxwell?

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

8 THE WITNESS: I do recall seeing messages
9 utilizing her pad, her stationery.

10 BY MR. EDWARDS:

11 Q. Okay. Do you remember messages
12 specifically that Ms. Maxwell, she is home, or calls
13 for Ms. Maxwell, or indicating that the person
14 taking the message is GM? Do you remember those?

15 A. Yes.

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

18 BY MR. EDWARDS:

19 Q. And did that give you further reason to
20 want to speak to Ghislane Maxwell?

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

23 THE WITNESS: Correct. I wanted to speak
24 with everyone in the home and everyone
25 associated with Jeffrey Epstein.

AFFIDAVIT

STATE OF FLORIDA)
COUNTY OF)

I, _____, being first
duly sworn, do hereby acknowledge that I did
read a true and certified copy of my deposition
which was taken in the case of GIUFFRE V.
MAXWELL, taken on the 24th day of September,
2016, and the corrections I desire to make are
as indicated on the attached Errata Sheet.

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF)

Before me personally appeared

_____,
to me well known / known to me to be the
person described in and who executed the
foregoing instrument and acknowledged to and
before me that he executed the said instrument
in the capacity and for the purpose therein
expressed.

Witness my hand and official seal, this
_____ day of _____, _____.

(Notary Public)

My Commission Expires: