

**COMPOSITE  
EXHIBIT 1  
(Filed Under Seal)**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

\*\*CONFIDENTIAL\*\*

Videotaped deposition of GHISLAINE  
MAXWELL, taken pursuant to subpoena, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, 575 Lexington  
Avenue, New York, New York, commencing  
April 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.

- - -

MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026

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<p>1 2 APPEARANCES: 3 4 BOIES SCHILLER &amp; FLEXNER, LLP Attorneys for Plaintiff 401 East Las Olas Boulevard 5 Fort Lauderdale, Florida, 33301 6 BY: SIGRID McCAWLEY, ESQUIRE MEREDITH SCHULTZ, ESQUIRE EMMA ROSEN, PARALEGAL 7 8 FARMER JAFFE WEISSING EDWARDS FISTOS &amp; 9 LEHRMAN, P.L. Attorneys for Plaintiff 10 425 N. Andrews Avenue Fort Lauderdale, Florida 33301 11 BY: BRAD EDWARDS, ESQUIRE 12 13 PAUL G. CASSELL, ESQUIRE Attorneys for Plaintiff 14 383 South University Street Salt Lake City, Utah 84112 15 16 HADDON MORGAN FOREMAN Attorneys for Defendant 17 150 East 10th Avenue Denver, Colorado 80203 18 BY: JEFFREY S. PAGLIUCA, ESQUIRE LAURA A. MENNINGER, ESQUIRE 19 20 Also Present: 21 James Christe, videographer 22 23 24 25</p>	<p>1 G Maxwell - Confidential 2 represent Ms. Giuffre. 3 MR. PAGLIUCA: Jeff Pagliuca and 4 Laura Menninger on behalf of Ms. 5 Maxwell. 6 GHISLAINE MAXWELL, called 7 as a witness, having been duly sworn by a 8 Notary Public, was examined and testified as 9 follows: 10 EXAMINATION BY 11 MS. McCAWLEY: 12 Q. Good morning. I'm going to explain 13 some of the rules that will happen with 14 respect to depositions. 15 Have you ever been deposed before? 16 A. I have not. 17 Q. What is going to happen here, we 18 have a court reporter and a videographer. 19 What they do is take down the words that we 20 say so when I ask you a question they will 21 record what you say in response to that. So 22 we have to be mindful that in order for them 23 to do their job we can't talk over each 24 other. 25 Another issue you have to be weary</p>
Page 3	Page 5
<p>1 2 THE VIDEOGRAPHER: We are now on 3 the record and recording. This begins 4 disk No. 1 in the deposition of 5 Ghislaine Maxwell in the matter of 6 Virginia Giuffre versus Ghislaine 7 Maxwell in the U.S. District Court for 8 the Southern District of New York. 9 Today is April 22, 2016 the time is 10 9:04 a.m.. This deposition is being 11 taken at 575 Lexington Avenue in New 12 York at the request of Sigrid McCawley 13 of Boies Schiller &amp; Flexner. 14 The videographer is James Christe 15 and the court reporter is Leslie Fagin. 16 Will counsel state their appearance and 17 whom they represent and then court 18 reporter swear in Ms. Maxwell. 19 MS. McCAWLEY: My name is Sigrid 20 McCawley with my colleague Meredith 21 Schultz. We are with Boies Schiller &amp; 22 Flexner. We represent Ms. Giuffre. 23 MR. EDWARDS: Brad Edwards. I also 24 represent Ms. Giuffre. 25 MR. CASSELL: Paul Cassell, I also</p>	<p>1 G Maxwell - Confidential 2 of is that in a response, you can't give a 3 nonverbal response, in other words, nodding a 4 yes or no, they need to hear verbal response 5 so they can record it on their transcript. 6 So that's important for you to remember as we 7 go through the day. If you forget, I will be 8 sure to remind you. 9 Is there anything that would 10 prevent you from giving truthful testimony 11 today? 12 A. There is not. 13 Q. You are not on any medications or 14 anything that would inhibit your ability to 15 remember or give truthful testimony? 16 A. I am not. 17 MR. PAGLIUCA: Could you identify 18 the assistant in the room. 19 MS. McCAWLEY: This is Emma Rosen 20 from our New York office. She is a 21 paralegal. 22 Q. Ms. Maxwell, can you please state 23 your address for the record? 24 A. Currently [REDACTED] 25 Q. What is your date of birth?</p>

<p style="text-align: right;">Page 6</p> <p>1 G Maxwell - Confidential</p> <p>2 A. [REDACTED]</p> <p>3 Q. When did you first recruit a female</p> <p>4 to work for Mr. Epstein?</p> <p>5 MR. PAGLIUCA: I object to the form</p> <p>6 and foundation of the question. I</p> <p>7 believe this is confidential</p> <p>8 information. I ask anyone who is not</p> <p>9 admitted in this case be excused from</p> <p>10 the room, please.</p> <p>11 MS. McCAWLEY: So the response to</p> <p>12 that question would --</p> <p>13 MR. PAGLIUCA: The subject matter</p> <p>14 of this question is confidential and I'm</p> <p>15 designating it as confidential.</p> <p>16 MS. McCAWLEY: I just want to make</p> <p>17 that clear for the record.</p> <p>18 MR. EDWARDS: So we don't delay the</p> <p>19 deposition I will step out of the room</p> <p>20 but I think it's important to lay the</p> <p>21 record that --</p> <p>22 MR. PAGLIUCA: I'm sorry, you are</p> <p>23 not admitted in this proceeding so you</p> <p>24 are not entitled to make any record. If</p> <p>25 Ms. McCawley wants to make a record she</p>	<p style="text-align: right;">Page 8</p> <p>1 G Maxwell - Confidential</p> <p>2 It's in the process of being sold. It still</p> <p>3 requires some final paperwork to be done, so</p> <p>4 just for the purposes of clarity.</p> <p>5 Q. Do you have a new address where you</p> <p>6 will be living?</p> <p>7 A. I do not.</p> <p>8 Q. For the purpose of the record, if</p> <p>9 there is something I ask you that you later</p> <p>10 remember something else or need to correct</p> <p>11 your testimony in some way, you can do that,</p> <p>12 just let me know what it is and we will go</p> <p>13 back to that question and can you clarify.</p> <p>14 A. Of course. I just wanted to be</p> <p>15 clear, there is still some paperwork pending</p> <p>16 for final release, but it's in the process of</p> <p>17 sale. But I don't have another address</p> <p>18 currently, so whilst that should still be of</p> <p>19 record that the mail could be forwarded</p> <p>20 there, so for purposes of clarity I wanted to</p> <p>21 be clear.</p> <p>22 Q. I appreciate that.</p> <p>23 So Ms. Maxwell, when did you first</p> <p>24 recruit a female to work for Mr. Epstein?</p> <p>25 MR. PAGLIUCA: Again. I object to</p>
<p style="text-align: right;">Page 7</p> <p>1 G Maxwell - Confidential</p> <p>2 can.</p> <p>3 MR. EDWARDS: I can make a record</p> <p>4 right now.</p> <p>5 MR. PAGLIUCA: Maybe we should get</p> <p>6 the judge on the phone and talk about</p> <p>7 it.</p> <p>8 MR. EDWARDS: The record will be</p> <p>9 short. This is the precise reason why</p> <p>10 Ms. Giuffre wants me in this case and</p> <p>11 I'm unable to effectively represent her</p> <p>12 at this time because I am unable to have</p> <p>13 access to the confidential information</p> <p>14 which includes apparently the entire</p> <p>15 deposition of Ms. Maxwell. But for the</p> <p>16 sake of not further delaying this, I</p> <p>17 will be outside the room.</p> <p>18 MS. McCAWLEY: Thank you.</p> <p>19 A. I would like to just -- wait for</p> <p>20 him to leave.</p> <p>21 Q. That's fine.</p> <p>22 A. I would just like to clarify the</p> <p>23 address. I'm in the process of selling the</p> <p>24 house so while while I still receive mail</p> <p>25 there, it's not my actual physical address.</p>	<p style="text-align: right;">Page 9</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation of the question.</p> <p>3 Q. You can answer the question.</p> <p>4 A. First of all, can you please</p> <p>5 clarify the question. I don't understand</p> <p>6 what you mean by female, I don't understand</p> <p>7 what you mean by recruit. Please be more</p> <p>8 clear and specific about what you are</p> <p>9 suggesting.</p> <p>10 Q. Are you a female, is that the sex</p> <p>11 that you are?</p> <p>12 A. I am a female.</p> <p>13 Q. That's what I'm referring to a</p> <p>14 female and I'm asking you when you first, the</p> <p>15 very first time you recruited a female to</p> <p>16 work for Mr. Epstein?</p> <p>17 A. Again, I don't understand what</p> <p>18 female -- I am a 54 year old women.</p> <p>19 Q. I'm not making it age, any age of a</p> <p>20 female that you recruited to work for Mr.</p> <p>21 Epstein?</p> <p>22 A. Again, I was somebody who hired a</p> <p>23 number of people to work for Mr. Epstein and</p> <p>24 hiring is one of my functions.</p> <p>25 Q. And when is the first time you</p>

<p style="text-align: right;">Page 10</p> <p>1 G Maxwell - Confidential</p> <p>2 hired someone to work for Mr. Epstein, a</p> <p>3 female?</p> <p>4 A. As best as I can recollect, a woman</p> <p>5 the age probably of about 40 or 50 was in</p> <p>6 sometime in 1992.</p> <p>7 Q. How long did you work for Mr.</p> <p>8 Epstein?</p> <p>9 A. I started working for him at some</p> <p>10 point in 1992 and the nature of my work</p> <p>11 relationship with him changed over time so</p> <p>12 from around 2002, 2003, the work lessened</p> <p>13 considerably.</p> <p>14 Q. When did you --</p> <p>15 MR. PAGLIUCA: Can I interject for</p> <p>16 a moment. If we are talking about</p> <p>17 background --</p> <p>18 MS. McCAWLEY: I'm in the middle of</p> <p>19 a question. Let me finish it and then</p> <p>20 can you interject.</p> <p>21 Q. When you say 2002 to 2003 that the</p> <p>22 work lessened, when did you complete working</p> <p>23 for Mr. Epstein; when was the last time you</p> <p>24 were employed by him, the last date?</p> <p>25 A. I believe I still was doing --</p>	<p style="text-align: right;">Page 12</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Object to the form</p> <p>3 and foundation.</p> <p>4 A. My job entailed running the homes</p> <p>5 that he had but much more importantly, most</p> <p>6 of the houses had construction and so whilst</p> <p>7 in 1992 there was no construction project,</p> <p>8 there was construction projects that began</p> <p>9 after that time and I was in charge not only</p> <p>10 of hiring architects, I was also in charge of</p> <p>11 all the filings or overseeing that, like a</p> <p>12 general contractor would.</p> <p>13 I also helped with hiring the</p> <p>14 architects, hiring the builders, reviewing</p> <p>15 the contracts for the builders, coordinating</p> <p>16 the building projects, coordinating how the</p> <p>17 projects would layout, the timing of the</p> <p>18 projects and all the various materials that</p> <p>19 they would require to run a very substantial</p> <p>20 building project. That's the nature of the</p> <p>21 job I was dealing with.</p> <p>22 Q. How old was the youngest female you</p> <p>23 ever hired to work for Jeffrey?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation.</p>
<p style="text-align: right;">Page 11</p> <p>1 G Maxwell - Confidential</p> <p>2 helping him in a very nominal way, maybe an</p> <p>3 hour or two a year at sometime 2008 and 2009.</p> <p>4 MR. PAGLIUCA: So if you are going</p> <p>5 to be talking about general background,</p> <p>6 I don't need to designate that as</p> <p>7 confidential. So if you want to have</p> <p>8 them come back in, that's fine.</p> <p>9 I assumed by your first question</p> <p>10 you were going into more sensitive</p> <p>11 areas. I will leave it up to you, but</p> <p>12 if this is general background it will</p> <p>13 not be designated as confidential.</p> <p>14 MS. McCAWLEY: I appreciate that.</p> <p>15 I will jump back into my other</p> <p>16 questions.</p> <p>17 MR. PAGLIUCA: So we will keep it</p> <p>18 as confidential.</p> <p>19 Q. When you were first employed by him</p> <p>20 in 1992, what were you hired to do?</p> <p>21 A. First, I was consulting and what I</p> <p>22 did was I helped with decorating houses and</p> <p>23 in hiring staff to help run those houses.</p> <p>24 Q. Did your duties change over the</p> <p>25 course of 1992 to 2009?</p>	<p style="text-align: right;">Page 13</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. You can answer.</p> <p>3 A. I have not any idea exactly of the</p> <p>4 youngest adult employee that I hired for</p> <p>5 Jeffrey.</p> <p>6 Q. When you say adult employee, did</p> <p>7 you ever hire someone that was under the age</p> <p>8 of 18?</p> <p>9 A. Never.</p> <p>10 Q. Did you ever bring someone who was</p> <p>11 under -- invite someone under the age of 18</p> <p>12 to Jeffrey's home, any of his homes?</p> <p>13 MR. PAGLIUCA: Object to the form</p> <p>14 foundation.</p> <p>15 A. Can you repeat the question?</p> <p>16 Q. Did you ever invite anybody who was</p> <p>17 under the age of 18 to Jeffrey's homes?</p> <p>18 MR. PAGLIUCA: Same objections.</p> <p>19 A. I have a number of friends that</p> <p>20 have children and friends of mine that have</p> <p>21 kids and in the invitation of my friends and</p> <p>22 their kids, I'm sure I may have invited some</p> <p>23 of my friend's kids to come.</p> <p>24 Q. Anybody that is not a friend of</p> <p>25 yours.</p>

<p style="text-align: right;">Page 14</p> <p>1 G Maxwell - Confidential</p> <p>2 Any female under the age of 18, did</p> <p>3 you invite them to come to Jeffrey's home?</p> <p>4 MR. PAGLIUCA: Object to the form</p> <p>5 and foundation.</p> <p>6 A. Again, as I said, I am not aware of</p> <p>7 inviting anybody other than friends of mine</p> <p>8 who have children to the house.</p> <p>9 Q. Did you invite Virginia Giuffre to</p> <p>10 come to Jeffrey Epstein's home when she was</p> <p>11 under the age of 18?</p> <p>12 MR. PAGLIUCA: Object to the form</p> <p>13 and foundation.</p> <p>14 A. Virginia Roberts held herself out</p> <p>15 as a masseuse and invited herself to come and</p> <p>16 give a massage.</p> <p>17 Q. My question is, did you invite</p> <p>18 Virginia Roberts when she was under the age</p> <p>19 of 18 to come to Jeffrey Epstein's home?</p> <p>20 MR. PAGLIUCA: Object to the form</p> <p>21 and foundation.</p> <p>22 A. Again, Virginia Roberts was a</p> <p>23 masseuse --</p> <p>24 Q. I'm asking not asking if she was a</p> <p>25 masseuse. I'm asking if you invited her to</p>	<p style="text-align: right;">Page 16</p> <p>1 G Maxwell - Confidential</p> <p>2 A. Ms. Roberts held herself out --</p> <p>3 Q. I'm not asking how she held herself</p> <p>4 out. I'm asking how she arrived at the home.</p> <p>5 Did you meet her and invite her to come to</p> <p>6 the home or how did she arrive there?</p> <p>7 MR. PAGLIUCA: Object to the form</p> <p>8 and foundation.</p> <p>9 A. Ms. Roberts held her to be a</p> <p>10 masseuse and her mother drove her to the</p> <p>11 house.</p> <p>12 Q. When did you first meet Virginia</p> <p>13 Roberts?</p> <p>14 A. I don't have a recollection of the</p> <p>15 first meeting.</p> <p>16 Q. Do you recall meeting her at</p> <p>17 Mar-a-Lago?</p> <p>18 A. Like I said, I don't have a</p> <p>19 recollection of meeting Ms. Roberts.</p> <p>20 Q. So you recall Ms. Roberts being</p> <p>21 brought to the home by her mother, is that</p> <p>22 your testimony?</p> <p>23 A. That is my testimony.</p> <p>24 Q. And that is the first time you met</p> <p>25 her?</p>
<p style="text-align: right;">Page 15</p> <p>1 G Maxwell - Confidential</p> <p>2 come to Jeffrey Epstein's home?</p> <p>3 A. Again, there would be no course to</p> <p>4 have a conversation with Virginia unless she</p> <p>5 held herself out to be a masseuse.</p> <p>6 Q. I'm not asking that question. I'm</p> <p>7 asking if you invited her to come to Jeffrey</p> <p>8 Epstein's home when she was under the age of</p> <p>9 18?</p> <p>10 A. Again, I repeat, she was a masseuse</p> <p>11 and in the form and as my job, I was to have</p> <p>12 people who he wanted for various things</p> <p>13 including massage. She came as a masseuse.</p> <p>14 Q. So you invited her to his home to</p> <p>15 come to give a massage, is that correct?</p> <p>16 MR. PAGLIUCA: Object to the form</p> <p>17 and foundation. Misstates the witness'</p> <p>18 testimony.</p> <p>19 A. Again, I did not invite Virginia</p> <p>20 Roberts. She came as a masseuse.</p> <p>21 Q. She who invited her to come as a</p> <p>22 masseuse, she just showed up at the front</p> <p>23 door?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation.</p>	<p style="text-align: right;">Page 17</p> <p>1 G Maxwell - Confidential</p> <p>2 A. Like I said, I don't recall meeting</p> <p>3 her the first time. I do remember her mother</p> <p>4 bringing her to the house.</p> <p>5 Q. Are you a member at Mar-a-Lago?</p> <p>6 A. No.</p> <p>7 Q. Have you visited Mar-a-Lago?</p> <p>8 A. Yes.</p> <p>9 Q. Did you visit Mar-a-Lago in the</p> <p>10 year 2000?</p> <p>11 A. I'm pretty sure I did.</p> <p>12 Q. When Ms. Roberts arrived at the</p> <p>13 home with her mother, what happened?</p> <p>14 A. I spoke to her mother outside of</p> <p>15 the house and she -- what I don't recall is</p> <p>16 exactly what happened because I was talking</p> <p>17 to her mother the entire she was in the</p> <p>18 house.</p> <p>19 Q. Did you introduce Ms. Roberts to</p> <p>20 Jeffrey Epstein?</p> <p>21 A. I don't recall how she actually met</p> <p>22 Mr. Epstein. As I said, I spoke to her</p> <p>23 mother the entire time outside the house.</p> <p>24 Q. Did you walk Ms. Roberts up to the</p> <p>25 upstairs location at the Palm Beach house to</p>



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<p>1 G Maxwell - Confidential</p> <p>2 meet Mr. Epstein?</p> <p>3 MR. PAGLIUCA: Object to the form</p> <p>4 and foundation.</p> <p>5 Q. You can answer.</p> <p>6 A. I just explained.</p> <p>7 A. I spent the entire time talking to</p> <p>8 Virginia's mother outside the house so the</p> <p>9 answer to the question is no.</p> <p>10 Q. No, did you not walk her up and</p> <p>11 introduce her to Mr. Epstein?</p> <p>12 A. I just said no.</p> <p>13 Q. Did you participate in a massage</p> <p>14 this first time when she first came to the</p> <p>15 home and you were speaking with her mother,</p> <p>16 she was in the home, is that correct, you</p> <p>17 brought her into the home?</p> <p>18 MR. PAGLIUCA: Object to the form</p> <p>19 and foundation.</p> <p>20 A. I will repeat again, I was standing</p> <p>21 outside with her mother so very difficult for</p> <p>22 me to do anything else at that time so no, I</p> <p>23 did not take her upstairs.</p> <p>24 Q. Did you participate --</p> <p>25 A. Virginia lied 100 percent about</p>	<p>1 G Maxwell - Confidential</p> <p>2 you not to answer that question. I</p> <p>3 don't have any problem with you asking</p> <p>4 questions about what the subject matter</p> <p>5 of this lawsuit is, which would be, as</p> <p>6 you've termed it, sexual trafficking of</p> <p>7 Ms. Roberts.</p> <p>8 To the extent you are asking for</p> <p>9 information relating to any consensual</p> <p>10 adult interaction between my client and</p> <p>11 Mr. Epstein, I'm going to instruct her</p> <p>12 not to answer because it's not part of</p> <p>13 this litigation and it is her private</p> <p>14 confidential information, not subject to</p> <p>15 this deposition.</p> <p>16 MS. McCAWLEY: You can instruct her</p> <p>17 not to answer. That is your right. But</p> <p>18 I will bring her back for another</p> <p>19 deposition because it is part of the</p> <p>20 subject matter of this litigation so she</p> <p>21 should be answering these questions.</p> <p>22 This is civil litigation, deposition and</p> <p>23 she should be responsible for answering</p> <p>24 these questions.</p> <p>25 MR. PAGLIUCA: I disagree and you</p>
Page 19	Page 21
<p>1 G Maxwell - Confidential</p> <p>2 absolutely everything that took place in that</p> <p>3 first meeting. She has lied repeatedly,</p> <p>4 often and is just an awful fantasist. So</p> <p>5 very difficult for anything to take place</p> <p>6 that she repeated because I was with her</p> <p>7 mother the entire time.</p> <p>8 Q. So did you have -- did you give a</p> <p>9 massage with Virginia Roberts and Mr. Epstein</p> <p>10 during the first time Virginia Roberts was at</p> <p>11 the West Palm Beach house?</p> <p>12 MR. PAGLIUCA: Object to the form</p> <p>13 and foundation.</p> <p>14 Q. Yes or no?</p> <p>15 A. No.</p> <p>16 Q. Have you ever given a massage with</p> <p>17 Virginia Roberts in the room and Jeffrey</p> <p>18 Epstein?</p> <p>19 MR. PAGLIUCA: Object to the form</p> <p>20 and foundation.</p> <p>21 A. No.</p> <p>22 Q. Have you ever given Jeffrey Epstein</p> <p>23 a massage?</p> <p>24 MR. PAGLIUCA: Object to the form,</p> <p>25 foundation. And I'm going to instruct</p>	<p>1 G Maxwell - Confidential</p> <p>2 understand the bounds that I put on it.</p> <p>3 MS. McCAWLEY: No, I don't. I will</p> <p>4 continue to ask my questions and you can</p> <p>5 continue to make your objections.</p> <p>6 Q. Did you ever participate from the</p> <p>7 time period of 1992 to 2009, did you ever</p> <p>8 participate in a massage with Jeffrey Epstein</p> <p>9 and another female?</p> <p>10 MR. PAGLIUCA: Objection. Do not</p> <p>11 answer that question. Again, to the</p> <p>12 extent you are asking for some sort of</p> <p>13 illegal activity as you've construed in</p> <p>14 connection with this case I don't have</p> <p>15 any problem with you asking that</p> <p>16 question. To the extent these questions</p> <p>17 involve consensual acts between adults,</p> <p>18 frankly, they're none of your business</p> <p>19 and I will instruct the witness not to</p> <p>20 answer.</p> <p>21 MS. McCAWLEY: This case involves</p> <p>22 sexual trafficking, sexual abuse,</p> <p>23 questions about her having interactions</p> <p>24 with other females is relevant to this</p> <p>25 case. She needs to answer these</p>

<p style="text-align: right;">Page 22</p> <p>1 G Maxwell - Confidential</p> <p>2 questions.</p> <p>3 MR. PAGLIUCA: I'm instructing her</p> <p>4 not to answer.</p> <p>5 MS. McCAWLEY: Then we will be back</p> <p>6 here again.</p> <p>7 Q. Have you ever given a massage to</p> <p>8 Mr. Epstein with a female that was under the</p> <p>9 age of 18?</p> <p>10 A. Can you repeat the question?</p> <p>11 Q. Yes. Have you ever given a massage</p> <p>12 to Mr. Epstein with a female that was under</p> <p>13 the age of 18?</p> <p>14 A. No.</p> <p>15 Q. Have you ever observed Mr. Epstein</p> <p>16 having a massage given by an individual, a</p> <p>17 female, who was under the age of 18?</p> <p>18 A. No.</p> <p>19 Q. Have you ever observed females</p> <p>20 under the age of 18 in the presence of</p> <p>21 Jeffrey Epstein at his home?</p> <p>22 MR. PAGLIUCA: Object to the form</p> <p>23 and foundation.</p> <p>24 A. Again, I have friends that have</p> <p>25 children --</p>	<p style="text-align: right;">Page 24</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Object to the form</p> <p>3 and foundation.</p> <p>4 A. How would I possibly know how</p> <p>5 someone is when they are at his house. You</p> <p>6 are asking me to do that. I cannot possibly</p> <p>7 testify to that. As far as I'm concerned,</p> <p>8 everyone who came to his house was an adult</p> <p>9 professional person.</p> <p>10 Q. Are you familiar with the police</p> <p>11 report that was issued in respect to the</p> <p>12 investigation in this matter?</p> <p>13 MR. PAGLIUCA: Object to the form</p> <p>14 and foundation.</p> <p>15 Q. Are you familiar with the police</p> <p>16 report that was used in this matter, the</p> <p>17 investigation of Jeffrey Epstein, has been</p> <p>18 produced as a document in this matter?</p> <p>19 A. I have seen a police report.</p> <p>20 (Maxwell Exhibit 1, police report,</p> <p>21 marked for identification.)</p> <p>22 Q. The police report that you have in</p> <p>23 front of you, can you turn to page 28 of that</p> <p>24 report, the numbers are on the top right-hand</p> <p>25 corner.</p>
<p style="text-align: right;">Page 23</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. I'm not talking about friends. I'm</p> <p>3 talking about individuals --</p> <p>4 MR. PAGLIUCA: I'm going to object</p> <p>5 to you interrupting the witness who was</p> <p>6 answering your question. The question</p> <p>7 was, have you ever seen anyone, female</p> <p>8 under the age of 18 at the house and</p> <p>9 that's the question she was answering.</p> <p>10 If you want to strike that question and</p> <p>11 ask another question, feel free, but let</p> <p>12 the witness respond, please.</p> <p>13 MS. McCAWLEY: I will do that.</p> <p>14 Q. Have you ever observed a female</p> <p>15 under the age of 18 at Jeffrey Epstein's home</p> <p>16 that was not a friend, a child -- one of your</p> <p>17 friend's children?</p> <p>18 A. Again, I can't testify to that</p> <p>19 because I have no idea what you are talking</p> <p>20 about.</p> <p>21 Q. You have no idea what I'm talking</p> <p>22 about in the sense you never observed a</p> <p>23 female under the age of 18 at Jeffrey</p> <p>24 Epstein's home that was not one of your</p> <p>25 friend's children, is that correct?</p>	<p style="text-align: right;">Page 25</p> <p>1 G Maxwell - Confidential</p> <p>2 You will see some redactions in</p> <p>3 this report, Ms. Maxwell, the redacted</p> <p>4 information is redacted because it reveals</p> <p>5 the name of a minor, someone who is under the</p> <p>6 age of 18.</p> <p>7 On page 28, in the third paragraph,</p> <p>8 about halfway down, it says, Roberts stated</p> <p>9 she performed the massage naked. At the</p> <p>10 conclusion of this massage, Epstein paid</p> <p>11 RobSON \$200 for the massage. He explained, I</p> <p>12 know you are not comfortable put I will pay</p> <p>13 you if you bring some girls. He told her the</p> <p>14 younger the better. Robson stated once tried</p> <p>15 to bring a 23 year old to Epstein and he</p> <p>16 stated the female was too old.</p> <p>17 Have you heard Mr. Epstein use the</p> <p>18 phrase the younger the better?</p> <p>19 A. I have no recollection of hearing</p> <p>20 that.</p> <p>21 Q. Have you used the phrase in talking</p> <p>22 to Ms. Roberts and asking her to recruit</p> <p>23 females for Mr. Epstein, the younger the</p> <p>24 better?</p> <p>25 MR. PAGLIUCA: Object to the form</p>



<p style="text-align: right;">Page 26</p> <p>1 G Maxwell - Confidential</p> <p>2 and foundation of the question.</p> <p>3 A. First of all, can you break the</p> <p>4 question apart.</p> <p>5 Q. Have you used the phrase the</p> <p>6 younger the better in speaking to Ms. Roberts</p> <p>7 and asking her to recruit females for Jeffrey</p> <p>8 Epstein?</p> <p>9 MR. PAGLIUCA: Object to the form</p> <p>10 and foundation.</p> <p>11 Q. You can answer. It's yes or no.</p> <p>12 A. No, that's absolutely not true, on</p> <p>13 the second part of your question, I have not</p> <p>14 asked Virginia to recruit females and the</p> <p>15 first part of your question, if you can</p> <p>16 repeat that again, the question you asked.</p> <p>17 Q. Will you read back the question.</p> <p>18 (Record read.)</p> <p>19 A. I believe I answered the later part</p> <p>20 of the question. The first part of the</p> <p>21 question, it's impossible for me to recall</p> <p>22 events that took place 16 years ago but it</p> <p>23 doesn't sound like something I would say.</p> <p>24 Q. On page 28, that same paragraph,</p> <p>25 Roberts was asked how many girls in total she</p>	<p style="text-align: right;">Page 28</p> <p>1 G Maxwell - Confidential</p> <p>2 A. First of all, as I said when I was</p> <p>3 present --</p> <p>4 Q. It is a yes or no.</p> <p>5 A. No, it is not.</p> <p>6 Q. You can answer the question in full</p> <p>7 but please provide yes or no as an initial</p> <p>8 matter.</p> <p>9 A. I cannot answer yes or no, it's not</p> <p>10 bounded by time. It's entirely possible I</p> <p>11 could have been in a room or even in the</p> <p>12 vicinity of Palm beach when somebody came and</p> <p>13 I would not know. How would I know when</p> <p>14 somebody was in the house. There is no way I</p> <p>15 can know.</p> <p>16 Q. Did you stay at Jeffrey Epstein's</p> <p>17 home when you were in Palm Beach?</p> <p>18 A. Most of the time.</p> <p>19 Q. So how is it that you wouldn't know</p> <p>20 if there was a female in the home under the</p> <p>21 age of 18 if you were staying there?</p> <p>22 A. Well, first of all, when I was</p> <p>23 staying there, the house is actually quite</p> <p>24 large and I have a very busy job and I had an</p> <p>25 office with a door so the door would be shut</p>
<p style="text-align: right;">Page 27</p> <p>1 G Maxwell - Confidential</p> <p>2 brought to Epstein. Robson stated that she</p> <p>3 can remember, Robson stated that she brought</p> <p>4 and, it's redacted there, and the victim in</p> <p>5 this case.</p> <p>6 Let me ask my question, I have a</p> <p>7 question pending right now.</p> <p>8 Are you testifying that you are</p> <p>9 unaware of any underage, under the age of 18,</p> <p>10 females coming to Jeffrey Epstein's home to</p> <p>11 perform massages?</p> <p>12 MR. PAGLIUCA: Object to the form</p> <p>13 foundation.</p> <p>14 A. You need to straddle that question</p> <p>15 in a different time period. When I was</p> <p>16 there, at the time I was present, the people</p> <p>17 that gave Jeffrey, men and women who gave</p> <p>18 Jeffrey massages were adults over the age of</p> <p>19 18.</p> <p>20 Q. Never in your time at any of</p> <p>21 Jeffrey Epstein's homes were you present when</p> <p>22 a female under the age of 18 was there to</p> <p>23 give Jeffrey Epstein a massage?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation.</p>	<p style="text-align: right;">Page 29</p> <p>1 G Maxwell - Confidential</p> <p>2 and I would be working. I'm not responsible</p> <p>3 for what Jeffrey does and I don't always pay</p> <p>4 attention to what happens in the house. I'm</p> <p>5 very busy.</p> <p>6 Q. So you're testifying that you never</p> <p>7 observed a female under the age of 18 at</p> <p>8 Jeffrey Epstein's West Palm Beach home?</p> <p>9 MR. PAGLIUCA: Object to the form</p> <p>10 and foundation.</p> <p>11 A. I already answered that question, I</p> <p>12 believe.</p> <p>13 Q. You didn't answer my question.</p> <p>14 A. I did.</p> <p>15 Q. Did you observe a female under the</p> <p>16 age of 18 at Jeffrey Epstein's home in Palm</p> <p>17 Beach?</p> <p>18 A. Like I said, I work, I don't sit</p> <p>19 there and watch people coming in and out of</p> <p>20 the house. I cannot possibly tell you if I'm</p> <p>21 in the home that somebody was there that I</p> <p>22 did not see, I cannot comment on it, I have</p> <p>23 no idea.</p> <p>24 Q. Did you observe females at Jeffrey</p> <p>25 Epstein's home that were laying out topless</p>

<p style="text-align: right;">Page 30</p> <p>1 G Maxwell - Confidential</p> <p>2 in the back of the home, in other words</p> <p>3 without a shirt on?</p> <p>4 A. So that's just another of</p> <p>5 Virginia's lies. So let's be clear, at the</p> <p>6 time when I was there and present, frequently</p> <p>7 at the house, it was unusual to see people</p> <p>8 without their clothes on.</p> <p>9 Q. When you say unusual, did you</p> <p>10 observe people without their clothes at</p> <p>11 Jeffrey Epstein's home?</p> <p>12 A. Can I answer. Sometimes people in</p> <p>13 the privacy of a house and swimming pool, I</p> <p>14 have seen people from time to time take their</p> <p>15 top off. I have seen people from time to</p> <p>16 time do that. Very unusual. Naked people</p> <p>17 around the people at any frequent period of</p> <p>18 time, I have never seen.</p> <p>19 Q. Were they under the age of 18?</p> <p>20 A. As I was saying, people when I was</p> <p>21 in the house, were of adult age, if they were</p> <p>22 children, friends of my family or friends</p> <p>23 that were there, they may well have been</p> <p>24 because I have nieces and nephews under the</p> <p>25 age of 18, I cannot testify to anybody else</p>	<p style="text-align: right;">Page 32</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Did you ever hire a masseuse that</p> <p>3 was under the age of 18?</p> <p>4 MR. PAGLIUCA: Object to the form</p> <p>5 and foundation.</p> <p>6 Q. Did you?</p> <p>7 A. Again, I don't hire massage</p> <p>8 therapists, so that was not my job.</p> <p>9 Q. You just said you did, you just</p> <p>10 said you hired massage therapists for Jeffrey</p> <p>11 Epstein, I'm asking if you hired a massage</p> <p>12 therapist who was under the age of 18?</p> <p>13 A. Let me correct myself. When I</p> <p>14 meant hire, I didn't mean hire in the way you</p> <p>15 are doing it. What I say is that I went to</p> <p>16 spas and I met people and if they did home</p> <p>17 visits, Jeffrey would then, in fact, hire</p> <p>18 them. I'm not responsible for hiring</p> <p>19 someone. And they were not full-time, so</p> <p>20 it's not a correct characterization.</p> <p>21 Q. Did you ever, your term is meet,</p> <p>22 did you ever meet a person that was under the</p> <p>23 age of 18 that you -- that Jeffrey then hired</p> <p>24 as a masseuse?</p> <p>25 MR. PAGLIUCA: Object to the form</p>
<p style="text-align: right;">Page 31</p> <p>1 G Maxwell - Confidential</p> <p>2 -- just another one of Virginia's many</p> <p>3 fictitious lies and stories to make this a</p> <p>4 salacious event to get interest and press.</p> <p>5 It's absolute rubbish.</p> <p>6 Q. Were you in charge of hiring</p> <p>7 individuals to provide massages for Jeffrey</p> <p>8 Epstein?</p> <p>9 A. My job included hiring many people.</p> <p>10 There were six homes. As I sit here, I hired</p> <p>11 assistants, I hired architects, I hired</p> <p>12 decorators, I hired cooks, I hired cleaners,</p> <p>13 I hired gardeners, I hired pool people, I</p> <p>14 hired pilots, I hired all sorts of people.</p> <p>15 In the course and a very small part</p> <p>16 of my job was from from time to time to find</p> <p>17 adult professional massage therapists for</p> <p>18 Jeffrey.</p> <p>19 Q. When you say adult professional</p> <p>20 massage therapists, where did you find these</p> <p>21 massage therapists?</p> <p>22 A. From time to time I would visit</p> <p>23 professional spas, I would receive a massage</p> <p>24 and if the massage was good I would ask that</p> <p>25 man or woman if they did home visits.</p>	<p style="text-align: right;">Page 33</p> <p>1 G Maxwell - Confidential</p> <p>2 and foundation.</p> <p>3 A. First of all, Virginia Roberts who</p> <p>4 you are referring to was a masseuse aged 17,</p> <p>5 we all now know, so your story that you keep</p> <p>6 pushing out to the press that she was a 15</p> <p>7 year old -- you and I both know was a lie,</p> <p>8 correct.</p> <p>9 Q. You are not sentencing my question.</p> <p>10 A. You and I both know that was a lie,</p> <p>11 correct.</p> <p>12 Q. You are not answering my question.</p> <p>13 I'm asking you whether you ever met a female</p> <p>14 under the age of 18 that Jeffrey then hired</p> <p>15 as a masseuse?</p> <p>16 MR. PAGLIUCA: Object to the form</p> <p>17 and foundation.</p> <p>18 A. The only person I can talk about</p> <p>19 who clearly was a massage age 17, a masseuse,</p> <p>20 was Virginia.</p> <p>21 Q. Did you meet her and then introduce</p> <p>22 her to Jeffrey?</p> <p>23 A. I don't know. I already testified</p> <p>24 I don't recall meeting her.</p> <p>25 (Maxwell Exhibit 2, email, marked</p>

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1 G Maxwell - Confidential  
2 for identification.)  
3 Q. So I'm showing you a document that  
4 we have marked as Maxwell Exhibit 2. It's a  
5 document you produced in this matter labeled  
6 confidential GM 00109. It's dated Sunday  
7 June 12, 2011. It's from Jeffrey Epstein to  
8 you. If you can turn to page 4 -- sorry, can  
9 you turn to the first page, the cover page  
10 initially which is 00109. If you look under  
11 the time stamp it says, June 12, 2011 at 4:12  
12 p.m., it says [REDACTED]  
13 Is that your email address?  
14 A. It is.  
15 Q. Under that it says, Thank you. I  
16 have it now and I'm working on a letter, a  
17 little, I will send the final version  
18 tomorrow and what ever it is will be  
19 factually accurate.  
20 Do you see that on page 1?  
21 A. I do.  
22 Q. Then I would like you to turn to  
23 page 4 please. The second paragraph down on  
24 page 4, it states, After some thought, I  
25 recall that I first met Ms. Roberts when she

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1 G Maxwell - Confidential  
2 was working at a premier resort claiming to  
3 be 18 years old and a professional masseuse?  
4 MR. PAGLIUCA: What line are you  
5 on, counsel.  
6 MS. McCAWLEY: Second paragraph  
7 down.  
8 MR. PAGLIUCA: I got it.  
9 Q. Is that a statement that you wrote?  
10 A. It appears to be.  
11 Q. So does that correct your testimony  
12 that you did meet Ms. Roberts at Mar-a-Lago?  
13 A. Again, this was written in, when  
14 were you saying?  
15 Q. 2011.  
16 A. So by 2011, Ms. Roberts had already  
17 perpetrated so many lies and stories it's  
18 hard for me to accurately tell you today what  
19 I remember back then. As I sit here today,  
20 the testimony I give you today, I do not  
21 recollect it.  
22 Q. Do you have a reason to say that  
23 this document that you wrote is incorrect?  
24 A. It's in 2011, I can't possibly tell  
25 you what I remember in 2011.

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1 G Maxwell - Confidential  
2 Q. Are you questioning that this  
3 document is incorrect, this document -- this  
4 email that you wrote?  
5 A. I wrote an email. I was trying to  
6 be accurate, so who knows, with all the  
7 rubbish that you guys have put out in the  
8 press that I read, maybe in the moment I  
9 wrote it a memory came to me that I don't  
10 know, but as I sit here today and the  
11 testimony I gave you today is I don't  
12 recollect it.  
13 Q. Does this refresh your recollection  
14 that you recalled meeting Ms. Roberts at  
15 Mar-a-Lago?  
16 A. It does not.  
17 Q. So your testimony today is that you  
18 don't remember meeting Ms. Roberts at  
19 Mar-a-Lago?  
20 A. I do not.  
21 I just want to clarify, when you  
22 read so much stuff and so much rubbish that  
23 comes out from Virginia Roberts, you don't  
24 know what's up and down, at the time I wrote  
25 this I believe I had a memory but as I sit

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1 G Maxwell - Confidential  
2 here today I do not.  
3 Q. Ms. Maxwell, when did you first  
4 meet [REDACTED]  
5 MR. PAGLIUCA: Object to the form  
6 and foundation.  
7 A. I have no idea when I met her.  
8 Q. Do you know how old she was when  
9 you met her?  
10 A. I have no idea how old she was when  
11 I met her.  
12 Q. Is it possible she was 13 years old  
13 when you first met her?  
14 MR. PAGLIUCA: Object to the form  
15 and foundation.  
16 A. [REDACTED] was Jeffrey's friend  
17 and [REDACTED]  
21 Q. I understand [REDACTED]  
22 [REDACTED]  
23 I'm asking if [REDACTED] was 13  
24 years old when you first met her?  
25 A. I have no idea.

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1 G Maxwell - Confidential  
2 Q. Was she under 18 when you first met  
3 her?  
4 A. I have no idea how old she was when  
5 I first met her.  
6 Q. Did she look like a child when you  
7 first met her?  
8 A. I don't remember what she looked  
9 like at the time she was in the house.  
10 Q. How many years have you known her?  
11 A. I can only recall the last time I  
12 saw her.  
13 Q. When was the first time you met  
14 her?  
15 A. Again, I just told you, I don't  
16 recall the first time I met her.  
17 Q. Did [REDACTED] travel with you  
18 on Jeffrey's planes?  
19 A. I wouldn't remember if [REDACTED] was on  
20 the plane or not.  
21 Q. Did you ever have sex with [REDACTED]  
22 [REDACTED]  
23 A. No.  
24 Q. Did you ever observe Jeffrey having  
25 sex with [REDACTED] [REDACTED]

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1 G Maxwell - Confidential  
2 A. No.  
3 Q. Were you aware that Jeffrey was  
4 having sexual contact with [REDACTED] when  
5 she was 13 years old?  
6 MR. PAGLIUCA: Object to the form  
7 and foundation.  
8 A. I would be very shocked and  
9 surprised if that were true.  
10 Q. Were you in the house when [REDACTED]  
11 [REDACTED] was in the house in a private area  
12 with Jeffrey Epstein?  
13 MR. PAGLIUCA: Object to the form  
14 and foundation.  
15 A. Can you repeat the question.  
16 Q. Were you ever in the Palm Beach  
17 house when Jeffrey Epstein was in the house  
18 with [REDACTED]  
19 MR. PAGLIUCA: Object to the form  
20 and foundation.  
21 A. I've already testified that I have  
22 met her and that she was there [REDACTED]  
23 [REDACTED] I don't understand what your  
24 question is asking.  
25 Q. So you have never seen [REDACTED]

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1 G Maxwell - Confidential  
2 [REDACTED]  
3 MR. PAGLIUCA: Object to the form  
4 and foundation.  
5 Q. Is that your testimony?  
6 A. I already said I don't recall all  
7 the times I've seen her and I have no memory  
8 of that.  
9 Q. Have you ever seen [REDACTED] in  
10 the house with Jeffrey Epstein [REDACTED]  
11 [REDACTED]  
12 MR. PAGLIUCA: Object to the form  
13 and foundation.  
14 A. I just told you I don't recall  
15 seeing [REDACTED]  
16 Q. Were you ever involved in an orgy  
17 with [REDACTED]  
18 A. No, absolutely not.  
19 Q. Can you tell me, do you know an  
20 individual by the name of Nadia Marcinkova?  
21 A. I do.  
22 Q. How did you meet Nadia Marcinkova?  
23 A. At some point she was a friend of  
24 Jeffrey's and I recall meeting her at some  
25 point.

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1 G Maxwell - Confidential  
2 Q. Did you hire her?  
3 A. First of all, I don't hire girls  
4 like that, so let's be clear, I already  
5 testified to that, and I have no idea what  
6 you are referring to.  
7 Q. When you say girls like that, what  
8 do you mean?  
9 A. I hire people who are professional  
10 at the house. You are asking if I hired  
11 somebody to do what, I don't know what you  
12 are talking about. I hired people to work in  
13 the homes.  
14 Q. What was Nadia Marcinkova doing?  
15 MR. PAGLIUCA: Object to the form  
16 and foundation.  
17 A. I have no idea what Nadia  
18 Marcinkova was doing. I didn't hire her and  
19 I don't know what you are referring to.  
20 Q. You met Nadia Marcinkova?  
21 A. I testified I did.  
22 Q. Did she work for Jeffrey Epstein?  
23 A. I have no idea what she did.  
24 Q. Have you flown on planes with Nadia  
25 Marcinkova?



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<p>1 G Maxwell - Confidential</p> <p>2 A. I don't recollect. I don't know if</p> <p>3 I did.</p> <p>4 Q. How many times have you flown on</p> <p>5 Jeffrey Epstein's planes?</p> <p>6 A. Too many times.</p> <p>7 Q. More than 300?</p> <p>8 A. I really couldn't tell you how</p> <p>9 many.</p> <p>10 Q. More than 400?</p> <p>11 A. Again, I said I cannot tell you how</p> <p>12 many, a lot.</p> <p>13 Q. How many times with Nadia</p> <p>14 Marcinkova?</p> <p>15 A. I already testified, I have no</p> <p>16 idea.</p> <p>17 Q. How old was Nadia Marcinkova when</p> <p>18 she first became involved with Jeffrey?</p> <p>19 A. I have no idea.</p> <p>20 Q. Was she 14?</p> <p>21 MR. PAGLIUCA: Object to the form</p> <p>22 and foundation.</p> <p>23 A. I have no idea.</p> <p>24 Q. Did she look like a child the first</p> <p>25 time you met her?</p>	<p>1 G Maxwell - Confidential</p> <p>2 evidence. The witness already testified</p> <p>3 she doesn't remember.</p> <p>4 Q. You can answer that question.</p> <p>5 Did you ever ask her on the many</p> <p>6 flights you were with her or the many times</p> <p>7 you were with her at the house?</p> <p>8 A. First of all, I don't know I was on</p> <p>9 many flights with her, you are making stories</p> <p>10 up again as usual. And secondly, if I was on</p> <p>11 a flight with her, there would not be any</p> <p>12 reason why I would ask her how old she was.</p> <p>13 Q. You don't recollect having any</p> <p>14 conversation with her about her age?</p> <p>15 A. I already testified to that.</p> <p>16 Q. Do you know what Nadia Marcinkova</p> <p>17 was hired to do for Jeffrey?</p> <p>18 A. I already testified I didn't know</p> <p>19 she was hired and I don't know that she did</p> <p>20 anything. I don't know how to answer that</p> <p>21 question.</p> <p>22 Q. Was Nadia Marcinkova at the house,</p> <p>23 the Palm Beach house, when you were present</p> <p>24 at that house?</p> <p>25 MR. PAGLIUCA: Object to the</p>
Page 43	Page 45
<p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Object to the form</p> <p>3 and foundation. Asked and answered.</p> <p>4 Q. Did she look like a child the first</p> <p>5 time you met Nadia Marcinkova?</p> <p>6 A. I don't know what you mean if she</p> <p>7 looked like a child.</p> <p>8 Q. Did she look like she was under the</p> <p>9 age of 18?</p> <p>10 A. No.</p> <p>11 Q. Did she look like she was under the</p> <p>12 age of 16?</p> <p>13 A. I just testified -- first of all, I</p> <p>14 couldn't tell you how old she was, she didn't</p> <p>15 like like a child, leave it at that.</p> <p>16 Q. Did you know that she was a child?</p> <p>17 MR. PAGLIUCA: Object to the form</p> <p>18 and foundation.</p> <p>19 A. I just answered I did not know how</p> <p>20 old she was and she looked like an adult.</p> <p>21 Q. In the times that you traveled with</p> <p>22 her on Jeffrey Epstein's planes, did you ever</p> <p>23 ask her how old she was?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation. Assumes facts not in</p>	<p>1 G Maxwell - Confidential</p> <p>2 foundation.</p> <p>3 A. I have no recollection of her being</p> <p>4 at the house at the same time as me.</p> <p>5 Q. When did you first meet Nadia</p> <p>6 Marcinkova?</p> <p>7 A. I already told you I don't recall.</p> <p>8 Q. Do you recall anything about Nadia</p> <p>9 Marcinkova?</p> <p>10 A. That she was tall and blond.</p> <p>11 Q. Do you recall Nadia Marcinkova</p> <p>12 interacting with other females at the house?</p> <p>13 A. No, I do not.</p> <p>14 Q. Did you arrange to get a visa for</p> <p>15 Nadia Marcinkova to come into this country?</p> <p>16 MR. PAGLIUCA: Object to the form</p> <p>17 and foundation.</p> <p>18 A. Absolutely not.</p> <p>19 Q. Did Jeffrey arrange for a visa for</p> <p>20 Nadia Marcinkova?</p> <p>21 MR. PAGLIUCA: You need to give me</p> <p>22 a break so I can interpose an objection.</p> <p>23 Object to the form and foundation.</p> <p>24 Q. You can answer.</p> <p>25 A. What was the question?</p>



Page 46	Page 48
<p>1 G Maxwell - Confidential</p> <p>2 Q. Did Jeffrey arrange for a visa for</p> <p>3 Nadia Marcinkova?</p> <p>4 A. I don't know what Jeffrey did. I</p> <p>5 cannot testify what Jeffrey did.</p> <p>6 Q. Was Nadia involved in sex with</p> <p>7 Jeffrey and other girls?</p> <p>8 MR. PAGLIUCA: Object to the form</p> <p>9 and foundation.</p> <p>10 Q. Girls under the age of 18?</p> <p>11 MR. PAGLIUCA: Same objection.</p> <p>12 A. I have no idea.</p> <p>13 Q. Was Nadia involved with sex with</p> <p>14 Jeffrey and girls over the age of 18?</p> <p>15 MR. PAGLIUCA: Same objection.</p> <p>16 A. I have no idea.</p> <p>17 Q. Did Nadia recruit other girls for</p> <p>18 sex with Jeffrey?</p> <p>19 MR. PAGLIUCA: Object to the form</p> <p>20 and foundation.</p> <p>21 A. I have no idea.</p> <p>22 Q. Do you still talk to Nadia?</p> <p>23 A. No.</p> <p>24 Q. Is she a pilot?</p> <p>25 A. I have no idea.</p>	<p>1 G Maxwell - Confidential</p> <p>2 Jeffrey?</p> <p>3 MR. PAGLIUCA: Object to the form</p> <p>4 and foundation.</p> <p>5 A. I don't know exactly the nature of</p> <p>6 her relationship but she worked for him.</p> <p>7 Q. What did she do?</p> <p>8 MR. PAGLIUCA: Object to the form</p> <p>9 and foundation.</p> <p>10 A. At the time she when was with him I</p> <p>11 believe she traveled with him and helped with</p> <p>12 his travel arrangements.</p> <p>13 Q. Did she bring girls to the house to</p> <p>14 give massages to Jeffrey?</p> <p>15 MR. PAGLIUCA: Object to the form</p> <p>16 and foundation.</p> <p>17 A. I don't know what Sarah did.</p> <p>18 Q. So you never observed Sarah</p> <p>19 bringing girls to the home to give massages</p> <p>20 to Jeffrey?</p> <p>21 MR. PAGLIUCA: Object to the form</p> <p>22 and foundation.</p> <p>23 A. I don't understand the question,</p> <p>24 what did you mean bring?</p> <p>25 Q. Did you ever observe Sarah</p>
Page 47	Page 49
<p>1 G Maxwell - Confidential</p> <p>2 Q. Does she fly with Larry Veseski</p> <p>3 (phonetic), one of Jeffrey's pilots?</p> <p>4 A. I have no idea.</p> <p>5 Q. Are you a pilot?</p> <p>6 A. I am.</p> <p>7 Q. Have you flown with Jeffrey Veseki?</p> <p>8 A. I have.</p> <p>9 Q. Have you flown with Nadia</p> <p>10 Marcinkova?</p> <p>11 A. What do you mean by flown?</p> <p>12 Q. Have you been on planes with her?</p> <p>13 A. I already testified I don't recall</p> <p>14 having her on a plane with me.</p> <p>15 Q. Do you know Sarah Kellen?</p> <p>16 A. I do.</p> <p>17 Q. When did you first meet her?</p> <p>18 A. I don't recall exact dates.</p> <p>19 Q. Did you meet her with the purpose</p> <p>20 of hiring her to work for Jeffrey or having</p> <p>21 Jeffrey hire her?</p> <p>22 MR. PAGLIUCA: Object to the form</p> <p>23 and foundation.</p> <p>24 A. No.</p> <p>25 Q. What was her relationship with</p>	<p>1 G Maxwell - Confidential</p> <p>2 inviting, bringing, walking anyone into the</p> <p>3 home to give a massage for Jeffrey?</p> <p>4 MR. PAGLIUCA: Object to the form</p> <p>5 and foundation.</p> <p>6 A. I don't recollect anything like</p> <p>7 that.</p> <p>8 Q. Are you aware that Sarah Kellen was</p> <p>9 a co-conspirator, named as a co-conspirator</p> <p>10 in the case involving Jeffrey Epstein?</p> <p>11 MR. PAGLIUCA: Object to the form</p> <p>12 and foundation and also calls for a</p> <p>13 legal conclusion.</p> <p>14 MS. McCAWLEY I'm just asking if she</p> <p>15 is aware of that.</p> <p>16 A. I am aware.</p> <p>17 Q. Who paid Sarah Kellen?</p> <p>18 A. I have no idea.</p> <p>19 Q. Did you ever arrange payment for</p> <p>20 any of the employees at the home?</p> <p>21 MR. PAGLIUCA: Object to the form.</p> <p>22 A. What do you mean by arrange?</p> <p>23 Q. Were you ever in charge or</p> <p>24 responsible for paying individuals at the</p> <p>25 home, that worked there?</p>

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1 G Maxwell - Confidential  
 2 A. People had salaries and they were  
 3 paid by the office.  
 4 Q. Did you ever pay any individual,  
 5 did you ever hand an individual cash for work  
 6 they performed?  
 7 MR. PAGLIUCA: Object to the form.  
 8 A. Can you be more specific about what  
 9 you are asking me.  
 10 Q. Did you ever hand any individual  
 11 who was working at the home cash as payment  
 12 for something that they performed at the  
 13 home?  
 14 MR. PAGLIUCA: Object to the form.  
 15 A. To the best of my recollection  
 16 there were very few times where I would leave  
 17 some cash for people for work performed.  
 18 Q. And what type of work was being  
 19 performed where you would be doing that?  
 20 A. If I left cash for the pool guy, I  
 21 would have left potentially some cash for the  
 22 gardener, potentially for exercise  
 23 instructors and sometimes for massage  
 24 therapy.  
 25 Q. How much were the massage

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1 G Maxwell - Confidential  
 2 therapists paid?  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 A. They get paid between 100 and \$200.  
 6 Q. Did it vary based on what sexual  
 7 acts they performed?  
 8 MR. PAGLIUCA: Object to the form  
 9 and foundation.  
 10 A. No. It varied depending how much  
 11 time, some massage therapists charge more and  
 12 some charge less.  
 13 Q. Did the massage therapists that  
 14 were hired to come to the home perform sexual  
 15 acts for Jeffrey Epstein?  
 16 MR. PAGLIUCA: Object to the form  
 17 and foundation.  
 18 A. What are you asking me?  
 19 Q. I'm asking if the massage  
 20 therapists --  
 21 A. Are you asking me about underage  
 22 girls?  
 23 Q. I'm asking in general, did any of  
 24 the massage therapists in the home --  
 25 A. Are you asking if they were paid

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1 G Maxwell - Confidential  
 2 for sexual acts.  
 3 Q. I'm asking if they performed sexual  
 4 acts?  
 5 MR. PAGLIUCA: Object to the form  
 6 and foundation.  
 7 Q. Did any of the massage therapists  
 8 who were at the home perform sexual acts for  
 9 Jeffrey Epstein?  
 10 A. I don't know what you mean by  
 11 sexual acts.  
 12 Q. Did any of the massage therapists  
 13 who were working at the home perform sexual  
 14 acts, including touching the breasts,  
 15 touching the vaginal area, being touched  
 16 while Jeffrey is masturbating, having  
 17 intercourse, any of those things?  
 18 MR. PAGLIUCA: Objection. Form and  
 19 foundation.  
 20 To the extent any of this is asking  
 21 for to your knowledge any consensual sex  
 22 act that may or may not have involved  
 23 you, I'm instructing you not to answer  
 24 the question.  
 25 Q. I'm not asking about consensual sex

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1 G Maxwell - Confidential  
 2 acts. I'm asking whether any of the massage  
 3 therapists performed sexual acts for Mr.  
 4 Epstein, as I have just described?  
 5 A. I have never seen anybody have  
 6 sexual intercourse with with Jeffrey, ever.  
 7 Q. I'm not asking about sexual  
 8 intercourse. I'm asking about any sexual  
 9 act, touching of the breast -- did you ever  
 10 see -- can you read back the question?  
 11 (Record read.)  
 12 A. I'm not addressing any questions  
 13 about consensual adult sex. If you want to  
 14 talk about what the subject matter, which is  
 15 defamation and lying, Virginia Roberts, that  
 16 you and Virginia Roberts are participating in  
 17 perpetrating her lies, I'm happy to address  
 18 those. I never saw any inappropriate  
 19 underage activities with Jeffrey ever.  
 20 Q. I'm not asking about underage. I'm  
 21 asking about whether any of the masseuses  
 22 that were at the home perform sexual acts for  
 23 Jeffrey Epstein?  
 24 A. I have just answered the question.  
 25 Q. No, you haven't.

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<p>1 G Maxwell - Confidential</p> <p>2 A. I have.</p> <p>3 Q. No, you haven't.</p> <p>4 A. Yes, I have.</p> <p>5 Q. You are refusing to answer the</p> <p>6 question.</p> <p>7 A. Let's move on.</p> <p>8 Q. I'm in charge of the deposition. I</p> <p>9 say when we move on and when we don't.</p> <p>10 You are here to respond to my</p> <p>11 questions. If you are refusing to answer the</p> <p>12 court will bring you back for another</p> <p>13 deposition to answer these questions.</p> <p>14 Do you understand that?</p> <p>15 MR. PAGLIUCA: You don't need to</p> <p>16 threaten the witness.</p> <p>17 MS. McCRAWLEY: I'm not threatening</p> <p>18 her. I'm making sure the record is</p> <p>19 clear.</p> <p>20 MR. PAGLIUCA: Certainly can you</p> <p>21 apply to have someone come back and the</p> <p>22 court may or may not have her come back</p> <p>23 again.</p> <p>24 Again, she is not answering</p> <p>25 questions that relate to adult consent</p>	<p>1 G Maxwell - Confidential</p> <p>2 sexual acts on her?</p> <p>3 MR. PAGLIUCA: Object to the form</p> <p>4 and foundation.</p> <p>5 A. I have not heard that.</p> <p>6 Q. How do you know Annie Farmer?</p> <p>7 A. Annie Farmer had a sister and her</p> <p>8 sister introduced Annie Farmer, I believe, to</p> <p>9 Jeffrey.</p> <p>10 Q. Was Annie Farmer under the age of</p> <p>11 18?</p> <p>12 MR. PAGLIUCA: Object to the form</p> <p>13 and foundation.</p> <p>14 A. I don't recall how old Annie Farmer</p> <p>15 was.</p> <p>16 Q. Did she tell police that Jeffrey</p> <p>17 Epstein assaulted her sexually?</p> <p>18 MR. PAGLIUCA: Object to the form</p> <p>19 and foundation.</p> <p>20 A. I never heard that.</p> <p>21 Q. Did Sarah Kellen recruit or bring</p> <p>22 girls to the home that were under the age of</p> <p>23 18?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation and I think this has been</p>
Page 55	Page 57
<p>1 G Maxwell - Confidential</p> <p>2 sex acts. Period. And that's the</p> <p>3 instruction and we can take it up with</p> <p>4 the court.</p> <p>5 Q. Ms. Maxwell, are you aware of any</p> <p>6 sexual acts with masseuses and Jeffrey</p> <p>7 Epstein that were nonconsensual?</p> <p>8 A. No.</p> <p>9 Q. How do you know that?</p> <p>10 A. All the time that I have been in</p> <p>11 the house I have never seen, heard, nor</p> <p>12 witnessed, nor have reported to me that any</p> <p>13 activities took place, that people were in</p> <p>14 distress, either reported to me by the staff</p> <p>15 or anyone else. I base my answer based on</p> <p>16 that.</p> <p>17 Q. Are you familiar with a person by</p> <p>18 the name of Annie Farmer?</p> <p>19 A. I am.</p> <p>20 Q. Has Annie Farmer given a statement</p> <p>21 to police about you performing sexual acts on</p> <p>22 her?</p> <p>23 A. I have not heard that.</p> <p>24 Q. Has Annie Farmer given a statement</p> <p>25 to police about Jeffrey Epstein performing</p>	<p>1 G Maxwell - Confidential</p> <p>2 asked and answered already.</p> <p>3 Q. You can answer the question.</p> <p>4 A. I have no idea what Sarah Kellen</p> <p>5 did.</p> <p>6 Q. You never observed Sarah Kellen</p> <p>7 with girls under the age of 18 at Jeffrey's</p> <p>8 home?</p> <p>9 MR. PAGLIUCA: Object to the form</p> <p>10 and foundation.</p> <p>11 A. The answer is no, I have no idea.</p> <p>12 Q. Do you know Glenn Dubin?</p> <p>13 A. I do.</p> <p>14 Q. What is your relationship with</p> <p>15 Glenn Dubin?</p> <p>16 MR. PAGLIUCA: Object to the form.</p> <p>17 A. What do you mean what is my</p> <p>18 relationship.</p> <p>19 Q. Are you friendly with him, how do</p> <p>20 you know him?</p> <p>21 A. He is the husband of Eva Dubin.</p> <p>22 Q. Is Eva Dubin one of your friends?</p> <p>23 A. Yes.</p> <p>24 Q. Did you ever send Virginia to</p> <p>25 Glenn's condo at the Breakers to give him a</p>

<p style="text-align: right;">Page 58</p> <p>1 G Maxwell - Confidential</p> <p>2 massage?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. No.</p> <p>6 Q. Did you ever instruct Virginia</p> <p>7 Roberts to have sex with Glenn?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. I have never instructed Virginia to</p> <p>11 have sex with anybody ever.</p> <p>12 Q. How old was Eva Anderson when she</p> <p>13 met Jeffrey?</p> <p>14 MR. PAGLIUCA: Objection to the</p> <p>15 form and foundation.</p> <p>16 A. I have no idea.</p> <p>17 Q. What's she under the age of 18?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 A. I just testified I have idea how</p> <p>21 old she was.</p> <p>22 Q. You testified she was your friend.</p> <p>23 You don't know how old she was when she met</p> <p>24 Jeffrey?</p> <p>25 A. That happened sometime in the '70s,</p>	<p style="text-align: right;">Page 60</p> <p>1 G Maxwell - Confidential</p> <p>2 A. She was tasked to answer</p> <p>3 telephones.</p> <p>4 Q. Did you ever ask her to rub</p> <p>5 Jeffrey's feet?</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation.</p> <p>8 A. I believe that I have read that,</p> <p>9 but I don't have any memory of it.</p> <p>10 Q. Did you ever tell Johanna that she</p> <p>11 would get extra money if she provided Jeffrey</p> <p>12 massages?</p> <p>13 A. I was always happy to give career</p> <p>14 advice to people and I think that becoming</p> <p>15 somebody in the healthcare profession, either</p> <p>16 exercise instructor or nutritionist or</p> <p>17 professional massage therapist is an</p> <p>18 excellent job opportunity. Hourly wages are</p> <p>19 around 7, 8, \$9 and as a professional</p> <p>20 healthcare provider you can earn somewhere</p> <p>21 between as we have established 100 to \$200</p> <p>22 and to be able to travel and have a job that</p> <p>23 pays that is a wonderful job opportunity. So</p> <p>24 in the context of advising people for</p> <p>25 opportunities for work, it is possible that I</p>
<p style="text-align: right;">Page 59</p> <p>1 G Maxwell - Confidential</p> <p>2 how would I know, or '80s. I have no idea.</p> <p>3 Can you testify to what your friends did 30</p> <p>4 years ago?</p> <p>5 Q. You don't ask the questions here,</p> <p>6 Ms. Maxwell.</p> <p>7 What about Johanna Sjoberg, when</p> <p>8 did you first meet Johanna?</p> <p>9 A. I don't recall the exact date.</p> <p>10 Q. Did you hire Johanna?</p> <p>11 A. I don't hire people, she came to</p> <p>12 work at the house to answer phones.</p> <p>13 Q. Where did you meet her?</p> <p>14 A. I just testified, I don't recall</p> <p>15 exactly when I met her.</p> <p>16 Q. Was one of your job</p> <p>17 responsibilities to interview people that</p> <p>18 would be then hired by Jeffrey?</p> <p>19 A. That was one of my</p> <p>20 responsibilities.</p> <p>21 Q. Do you recall interviewing Johanna?</p> <p>22 A. I don't recall the exact interview,</p> <p>23 no.</p> <p>24 Q. Do you know what tasks Johanna was</p> <p>25 hired to performance?</p>	<p style="text-align: right;">Page 61</p> <p>1 G Maxwell - Confidential</p> <p>2 would have said that she should explore that</p> <p>3 as an option.</p> <p>4 Q. Did you tell her she would get</p> <p>5 extra money if she massaged Jeffrey?</p> <p>6 A. I'm just saying, I cannot recall</p> <p>7 the exact conversation. I give career advice</p> <p>8 and I have done that.</p> <p>9 Q. Did you ever have Johanna massage</p> <p>10 you?</p> <p>11 A. I did.</p> <p>12 Q. How many times?</p> <p>13 A. I don't recall how many times.</p> <p>14 Q. Was there sex involved?</p> <p>15 A. No.</p> <p>16 Q. Did you ever instruct Johanna to</p> <p>17 massage Glenn Dubin?</p> <p>18 A. I don't believe -- I have no</p> <p>19 recollection of it.</p> <p>20 Q. Did you ever have sexual contact</p> <p>21 with Johanna?</p> <p>22 MR. PAGLIUCA: Object to the form</p> <p>23 and foundation. You need to give me an</p> <p>24 opportunity to get in between the</p> <p>25 questions.</p>



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<p>1 G Maxwell - Confidential</p> <p>2 Anything that involves consensual</p> <p>3 sex on your part, I'm instructing you</p> <p>4 not to answer.</p> <p>5 Q. Did you ever have sexual contact</p> <p>6 with Johanna?</p> <p>7 A. Again, she is an adult --</p> <p>8 Q. I'm asking you, did you ever have</p> <p>9 sexual contact with Johanna?</p> <p>10 A. I've just been instructed not to</p> <p>11 answer.</p> <p>12 Q. On what basis?</p> <p>13 A. You have to ask my lawyer.</p> <p>14 Q. Did you ever have sexual contact</p> <p>15 with Johanna that was not consensual on</p> <p>16 Johanna's part?</p> <p>17 MR. PAGLIUCA: You can answer</p> <p>18 nonconsensual.</p> <p>19 A. I've never had nonconsensual sex</p> <p>20 with anybody.</p> <p>21 Q. Not Annie Farmer?</p> <p>22 MR. PAGLIUCA: Objection.</p> <p>23 A. I just testified I never had</p> <p>24 nonconsensual sex with anybody ever, at any</p> <p>25 time, at anyplace, at any time, with anybody.</p>	<p>1 G Maxwell - Confidential</p> <p>2 Q. Did you have sex with her?</p> <p>3 MR. PAGLIUCA: This is the same</p> <p>4 instruction about consensual or</p> <p>5 nonconsensual.</p> <p>6 Q. Was Emmy under the age of 18 when</p> <p>7 you hired her?</p> <p>8 A. No. I didn't hire her, as I said,</p> <p>9 Jeffrey did.</p> <p>10 Q. Did Emmy ever have sex with</p> <p>11 Jeffrey?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. How would I know what somebody else</p> <p>15 did.</p> <p>16 Q. You weren't involved in the sex</p> <p>17 between Jeffrey, Emmy and yourself?</p> <p>18 A. We already --</p> <p>19 Q. Were you involved with sex between</p> <p>20 Jeffrey, Emmy and yourself?</p> <p>21 MR. PAGLIUCA: Everyone is talking</p> <p>22 over each other. You heard the</p> <p>23 question.</p> <p>24 Again, you you know what the</p> <p>25 instruction is. If there is any</p>
Page 63	Page 65
<p>1 G Maxwell - Confidential</p> <p>2 Q. So if Johanna were to testify that</p> <p>3 she did not consent to a sexual act that you</p> <p>4 participated in --</p> <p>5 A. I just told you I have never ever</p> <p>6 under any circumstances with anybody, at any</p> <p>7 time, in anyplace, in any form had</p> <p>8 nonconsensual relations with anybody.</p> <p>9 Q. Did you introduce Johanna to Prince</p> <p>10 Andrew?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. I've, again, read that Johanna</p> <p>14 claimed that she met or that she said she met</p> <p>15 Prince Andrew. I don't know if I was the one</p> <p>16 who made the introduction or not.</p> <p>17 Q. Do you know a female by the name of</p> <p>18 Emmy Taylor?</p> <p>19 A. I do.</p> <p>20 Q. How do you know her?</p> <p>21 A. Emmy was my assistant.</p> <p>22 Q. So she worked for you?</p> <p>23 A. Yes.</p> <p>24 Q. Did you hire her?</p> <p>25 A. Again, Jeffrey hired people.</p>	<p>1 G Maxwell - Confidential</p> <p>2 consensual issue involved, I instruct</p> <p>3 you not to answer.</p> <p>4 A. Moving on.</p> <p>5 Q. So you are refusing to answer that</p> <p>6 question?</p> <p>7 A. I've been instructed by my lawyer.</p> <p>8 Q. Did you ever have sex with Jeffrey,</p> <p>9 Emmy, Virginia and yourself when Virginia was</p> <p>10 underage?</p> <p>11 A. Absolutely not.</p> <p>12 MR. PAGLIUCA: We've been going for</p> <p>13 about an hour. I would like to take a</p> <p>14 five-minute break, please.</p> <p>15 MS. McCAWLEY: I'm almost done.</p> <p>16 MR. PAGLIUCA: You are not going to</p> <p>17 allow a break.</p> <p>18 MS. McCAWLEY: As soon as I get</p> <p>19 through my line of questioning, which is</p> <p>20 perfectly appropriate.</p> <p>21 Q. Did Emmy Taylor travel with you and</p> <p>22 Jeffrey to Europe?</p> <p>23 A. I'm sure she did.</p> <p>24 Q. What is she doing today?</p> <p>25 A. I have no idea.</p>



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1 G Maxwell - Confidential  
 2 Q. Do you speak to her regularly now,  
 3 do you speak to her?  
 4 A. No.  
 5 Q. Do you know where she lives?  
 6 A. No.  
 7 Q. Do you know what country she lives  
 8 in?  
 9 A. No.  
 10 Q. Where is the last place you knew  
 11 that she lived?  
 12 A. Last place I knew for sure was in  
 13 Los Angeles.  
 14 Q. When did she stop working for you?  
 15 A. 2001, 2002.  
 16 Q. What tasks did she performance for  
 17 you?  
 18 A. She helped me with moving in and  
 19 out of houses, construction, she was a  
 20 general help, she helped with buying things  
 21 that needed to be purchased, if I needed her  
 22 to stand in for me during meetings, it was a  
 23 very wide ranging job.  
 24 Q. Did she ever bring females to  
 25 perform massages for Jeffrey?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. What are you asking me?  
 5 Q. Did Emmy, was it ever Emmy's  
 6 responsibility to bring females to the house  
 7 for the purposes of massaging Jeffrey?  
 8 A. Emmy's job was to help me with the  
 9 houses and work in homes. It was not her job  
 10 to whatever you just said, bring masseuses.  
 11 Q. Did she do that?  
 12 A. I have no recollection. I have no  
 13 idea.  
 14 Q. Did you pay Emmy or did Jeffrey pay  
 15 her?  
 16 A. Jeffrey.  
 17 Q. Do you recall how much she was  
 18 paid?  
 19 A. I do not.  
 20 MS. McCAWLEY: I think we can take  
 21 a break now.  
 22 THE VIDEOGRAPHER: It's 10:02 and  
 23 we are off the record.  
 24 (Recess.)  
 25 THE VIDEOGRAPHER: It's now 10:18.

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1 G Maxwell - Confidential  
 2 We are back on the record and starting  
 3 disk No. 2.  
 4 Q. Ms. Maxwell, I asked you about  
 5 Virginia Roberts earlier.  
 6 Can you describe what Virginia  
 7 Roberts' duties were when she was with Mr.  
 8 Epstein?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I believe that Virginia was a  
 12 masseuse.  
 13 Q. Was Virginia required to dress up  
 14 in any way for massages?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I have no idea.  
 18 Q. Did you provide Virginia with  
 19 outfits to wear for certain massages?  
 20 A. I have no idea what you are talking  
 21 about.  
 22 Q. For example, did you ever provide  
 23 Virginia with a school girl outfit to wear  
 24 for a massage?  
 25 A. I have no idea what you are talking

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1 G Maxwell - Confidential  
 2 about.  
 3 Q. So you didn't provide her with  
 4 that?  
 5 A. As I just testified, I have no idea  
 6 what you are talking about.  
 7 Q. I was trying to interpret whether  
 8 you didn't understand what a school girl  
 9 outfit was or you are saying that didn't  
 10 happen?  
 11 A. I clearly know what a school girl  
 12 outfit is. I have no recollection of  
 13 providing anybody with a school girl outfit.  
 14 Q. Did you have a set of outfits used  
 15 by the massage therapists that would include  
 16 things like a school girl outfit or a black  
 17 patent leather outfit or anything of that  
 18 nature?  
 19 MR. PAGLIUCA: Object to the form  
 20 and foundation.  
 21 A. That would be just another one of  
 22 Virginia's lies.  
 23 Q. You didn't have anything like that?  
 24 A. I did not.  
 25 Q. Did you have a basket of sex toys

Page 70	Page 72
<p>1 G Maxwell - Confidential</p> <p>2 that you kept in the Palm Beach house?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. First of all what do you mean.</p> <p>6 Q. A laundry basket that contained sex</p> <p>7 toys in it?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. Can you ask the question again?</p> <p>11 Q. Did you have a laundry basket that</p> <p>12 contained sex toys in it, in the Palm Beach</p> <p>13 House?</p> <p>14 MR. PAGLIUCA: Objection to the</p> <p>15 form and foundation.</p> <p>16 Q. Did you have a laundry basket of</p> <p>17 sex toys in the Palm Beach house?</p> <p>18 MR. PAGLIUCA: Same objection.</p> <p>19 Q. You can answer.</p> <p>20 A. I don't recollect anything about a</p> <p>21 laundry basket of sex toys.</p> <p>22 Q. Do you recollect having sex toys at</p> <p>23 the Palm Beach house?</p> <p>24 A. You have to define what are you</p> <p>25 talking about.</p>	<p>1 G Maxwell - Confidential</p> <p>2 A. He was somebody who Jeffrey hired</p> <p>3 who worked at the house in Palm Beach.</p> <p>4 Q. I would like to have you turn to</p> <p>5 page, it should be page 76 of the actual</p> <p>6 transcript?</p> <p>7 MR. PAGLIUCA: We have two</p> <p>8 transcripts.</p> <p>9 Q. The mini version I think it is</p> <p>10 there.</p> <p>11 A. I don't have page 76.</p> <p>12 Q. So in the miniscript portion here,</p> <p>13 the beginning, there should be a page that</p> <p>14 looks like this, it's got a 76 at the top in</p> <p>15 the small square. Are you finding that, it's</p> <p>16 not too far back, I don't believe, it says</p> <p>17 page 19 the the bottom.</p> <p>18 A. Okay.</p> <p>19 Q. It's a miniscript like this. It</p> <p>20 has four squares?</p> <p>21 MS. MENNINGER: 109 or 19.</p> <p>22 MS. McCAWLEY: 19.</p> <p>23 MR. PAGLIUCA: The Bates label is</p> <p>24 000109.</p> <p>25 MS. McCAWLEY: Exactly.</p>
Page 71	Page 73
<p>1 G Maxwell - Confidential</p> <p>2 Q. A sex toy meaning a vibrator of</p> <p>3 some kind, sometimes they are called dildos,</p> <p>4 of that nature, anything like that?</p> <p>5 A. I don't recollect anything that</p> <p>6 would formally be a dildo, anything like</p> <p>7 that.</p> <p>8 Q. How would you describe sex toys?</p> <p>9 A. I wouldn't describe sex toys.</p> <p>10 Q. Did you have anything that was of</p> <p>11 an electronic nature that would be used</p> <p>12 during sex?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. I have no idea what you are</p> <p>16 referring to.</p> <p>17 (Maxwell Exhibit 3, transcript,</p> <p>18 marked for identification.)</p> <p>19 Q. Ms. Maxwell, I will show you what</p> <p>20 we are marking as Maxwell Exhibit 3.</p> <p>21 If you look at the cover you will</p> <p>22 see it's a deposition transcript of Juan</p> <p>23 Alessi, do you know who Juan Alessi is?</p> <p>24 A. I do.</p> <p>25 Q. Who is he?</p>	<p>1 G Maxwell - Confidential</p> <p>2 Q. I will direct your attention to</p> <p>3 page 76 in the deposition of Juan Alessi and</p> <p>4 it says, Would you describe for me what kinds</p> <p>5 of vibrators you found, question mark. The</p> <p>6 answer is, I'm not familiar, not too familiar</p> <p>7 with the names. They were big dildos, what</p> <p>8 they call big rubber things like that,</p> <p>9 indicating.</p> <p>10 A. I can't find where you are looking.</p> <p>11 Q. Page 76, right here.</p> <p>12 A. I need to be able to read this. I</p> <p>13 will not be answering anything I have not</p> <p>14 read. You can read it out and then I will</p> <p>15 read it.</p> <p>16 Q. Where was I. And I used to go and</p> <p>17 put on my gloves and pick them up and put</p> <p>18 them in the sink, rinse it off and put it in</p> <p>19 Ms. Maxwell's -- Ms. Maxwell had in her</p> <p>20 closet -- she had like a laundry basket, one</p> <p>21 of those laundry baskets that you put laundry</p> <p>22 in, she had full of these toys and that was</p> <p>23 -- that was me professionally leaving the</p> <p>24 room ready for the bed when they come back to</p> <p>25 the room again.</p>

Page 74	Page 76
<p>1 G Maxwell - Confidential</p> <p>2 Does that refresh your recollection</p> <p>3 that you had a laundry basket full of sex</p> <p>4 toys?</p> <p>5 MR. PAGLIUCA: Objection to the</p> <p>6 form and foundation.</p> <p>7 A. First I have to read this.</p> <p>8 Q. Sure.</p> <p>9 MS. McCAWLEY: I will stop the</p> <p>10 clock while the witness is reading.</p> <p>11 MR. PAGLIUCA: No.</p> <p>12 MS. McCAWLEY: Yes, if she is going</p> <p>13 to read the whole document, I will stop</p> <p>14 the clock.</p> <p>15 MR. PAGLIUCA: If you give her</p> <p>16 documents to refresh her recollection,</p> <p>17 we are on the clock here.</p> <p>18 MS. McCAWLEY: Then we will take it</p> <p>19 up with the judge.</p> <p>20 MR. PAGLIUCA: Read whatever you</p> <p>21 need to answer the question.</p> <p>22 MS. McCAWLEY: I'm going to set the</p> <p>23 document aside and I'm just go to ask</p> <p>24 you a question, independent of the</p> <p>25 document.</p>	<p>1 G Maxwell - Confidential</p> <p>2 situation.</p> <p>3 Q. Did you ever participate in sex</p> <p>4 with Virginia Roberts and Jeffrey Epstein?</p> <p>5 A. I never ever at any single time at</p> <p>6 any point ever at all participated in</p> <p>7 anything with Virginia and Jeffrey. And for</p> <p>8 the record, she is an absolute total liar and</p> <p>9 you all know she lied on multiple things and</p> <p>10 that is just one other disgusting thing she</p> <p>11 added.</p> <p>12 Q. Did you help her obtain an</p> <p>13 apartment in Palm Beach to live in?</p> <p>14 MR. PAGLIUCA: Objection to the</p> <p>15 form and foundation.</p> <p>16 Q. Was that part of your</p> <p>17 responsibilities for Jeffrey?</p> <p>18 A. First of all, I didn't know she had</p> <p>19 an apartment in Palm Beach. I only learned</p> <p>20 that from the many times you guys have gone</p> <p>21 to the press to sell stories, so no.</p> <p>22 Q. Did you help her get a cell phone,</p> <p>23 was that one of your responsibilities for</p> <p>24 Jeffrey, to get her is a cell phone as part</p> <p>25 of her masseuse obligations?</p>
Page 75	Page 77
<p>1 G Maxwell - Confidential</p> <p>2 Q. Do you recall having a basket full</p> <p>3 of sex toys?</p> <p>4 A. I already told you I did not.</p> <p>5 Q. We were talking a moment ago about</p> <p>6 Ms. Roberts and her position as a masseuse,</p> <p>7 do you know what she was paid for working as</p> <p>8 a masseuse for Jeffrey Epstein?</p> <p>9 A. I do not.</p> <p>10 Q. Did you ever pay her?</p> <p>11 A. I don't ever recall paying her.</p> <p>12 Q. Do you know what happened during</p> <p>13 the massage appointments with Jeffrey Epstein</p> <p>14 and Virginia Roberts?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. No.</p> <p>18 Q. Were you ever present to view a</p> <p>19 massage between Jeffrey Epstein and Virginia</p> <p>20 Roberts?</p> <p>21 A. I don't recollect ever seeing</p> <p>22 Virginia and Jeffrey in a massage situation.</p> <p>23 Q. Do you ever recollect seeing them</p> <p>24 in a sexual situation?</p> <p>25 A. I never saw them in a sexual</p>	<p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to the</p> <p>3 form and foundation.</p> <p>4 A. I don't know what that means,</p> <p>5 masseuse obligation, I don't know what you</p> <p>6 are referring to. Would you like to ask the</p> <p>7 question properly?</p> <p>8 Q. I think it was proper. I will ask</p> <p>9 it again.</p> <p>10 Did you ever assist in getting</p> <p>11 Virginia Roberts a cell phone to use during</p> <p>12 the time that she worked for Jeffrey Epstein?</p> <p>13 A. I have no recollection of doing</p> <p>14 anything of that nature.</p> <p>15 Q. Did you ever tell Virginia that you</p> <p>16 wanted her to have a cell phone so that she</p> <p>17 could be on call regularly?</p> <p>18 A. I have no recollection of that</p> <p>19 conversation.</p> <p>20 Q. How often would Virginia come over</p> <p>21 to the house in Palm Beach to give massages?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. Ask the question again, please.</p> <p>25 Q. How often did Virginia Roberts come</p>

<p style="text-align: right;">Page 78</p> <p>1 G Maxwell - Confidential</p> <p>2 over to the house in Palm Beach to give</p> <p>3 massages?</p> <p>4 A. It's important to understand that I</p> <p>5 wasn't with Jeffrey all the time. In fact, I</p> <p>6 was only in the house less than half the</p> <p>7 time, so I cannot testify to when I wasn't in</p> <p>8 the house how often she came when I wasn't</p> <p>9 there.</p> <p>10 What I can say is that I barely</p> <p>11 would remember her, if not for all of this</p> <p>12 rubbish, I probably wouldn't remember her at</p> <p>13 all, except she did come from time to time</p> <p>14 but I don't recollect her coming as often as</p> <p>15 she portrayed herself.</p> <p>16 Q. How many times a day on an average</p> <p>17 day would Jeffrey Epstein get a massage?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 A. When I was at the house and when I</p> <p>21 was there with him, he received a massage, on</p> <p>22 average, about once a day.</p> <p>23 Q. Just once?</p> <p>24 A. Yes.</p> <p>25 Q. Were there days when he received</p>	<p style="text-align: right;">Page 80</p> <p>1 G Maxwell - Confidential</p> <p>2 all, except for this story.</p> <p>3 Q. Do you recall Virginia Roberts</p> <p>4 calling you because she was having a medical</p> <p>5 crisis and you and Jeffrey taking her to the</p> <p>6 hospital?</p> <p>7 A. I have heard this absurd story and</p> <p>8 if any part of it were true I would remember</p> <p>9 that. I do not.</p> <p>10 Q. You don't remember taking her to</p> <p>11 the hospital?</p> <p>12 A. It's not that I don't remember it,</p> <p>13 it didn't happen.</p> <p>14 Q. How do you know it didn't happen?</p> <p>15 A. That's the sort of memory you would</p> <p>16 recall.</p> <p>17 Q. Do you recall, you said you don't</p> <p>18 remember her being at the New York mansion.</p> <p>19 When you were in New York would you stay at</p> <p>20 the New York mansion with Jeffrey?</p> <p>21 A. I stayed from time to time.</p> <p>22 Q. Do you recall Virginia being at the</p> <p>23 New York mansion when Prince Andrew came to</p> <p>24 visit?</p> <p>25 MR. PAGLIUCA: Objection to the</p>
<p style="text-align: right;">Page 79</p> <p>1 G Maxwell - Confidential</p> <p>2 four or five?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. When I was present at the house, I</p> <p>6 never saw something like that.</p> <p>7 Q. Do you know if Virginia was</p> <p>8 required to be on call at all times to come</p> <p>9 to the house if Jeffrey wanted her there?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation.</p> <p>12 A. I have no idea of the arrangements</p> <p>13 that Virginia made with Jeffrey.</p> <p>14 Q. When Virginia was in New York,</p> <p>15 would Virginia sleep at Jeffrey's mansion in</p> <p>16 New York?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I don't recollect her being in New</p> <p>20 York and I have no idea where she slept.</p> <p>21 Q. You don't ever remember seeing</p> <p>22 Virginia Roberts in New York?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. I would barely recollect her at</p>	<p style="text-align: right;">Page 81</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 A. Like I told you, I don't recall her</p> <p>4 being at the house at all.</p> <p>5 Q. How many homes does Jeffrey have?</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation.</p> <p>8 A. When I was working for him, I think</p> <p>9 he had six maybe.</p> <p>10 Q. Would Virginia stay with him in</p> <p>11 those homes?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. I can only testify for when I was</p> <p>15 present with him and I cannot say what she</p> <p>16 did when I wasn't present with him.</p> <p>17 Q. When you were present, would</p> <p>18 Virginia stay in the homes with him?</p> <p>19 A. I don't recall her staying in the</p> <p>20 houses.</p> <p>21 Q. Did you train Virginia on how to</p> <p>22 recruit other girls for massages?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. No.</p>



<p style="text-align: right;">Page 82</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Did you train Virginia on how to</p> <p>3 recruit other girls to perform sexual</p> <p>4 massages?</p> <p>5 MR. PAGLIUCA: Objection to the</p> <p>6 form and foundation.</p> <p>7 A. No. And it's absurd and her entire</p> <p>8 story is one giant tissue of lies and</p> <p>9 furthermore, she herself has -- if she says</p> <p>10 that, you have to ask her about what she did.</p> <p>11 Q. Does Jeffrey like to have his</p> <p>12 nipples pinched during sexual encounters?</p> <p>13 MR. PAGLIUCA: Objection to form</p> <p>14 and foundation.</p> <p>15 A. I'm not referring to any advice on</p> <p>16 my counsel. I'm not talking about any adult</p> <p>17 sexual things when I was with him.</p> <p>18 Q. When Jeffrey would have a massage,</p> <p>19 would he request that the masseuse pinch his</p> <p>20 nipples while he was having a massage?</p> <p>21 A. I'm not talking about anything with</p> <p>22 consensual adult situation.</p> <p>23 Q. What about with underage --</p> <p>24 A. I am not aware of anything.</p> <p>25 Q. You are not aware of Jeffrey</p>	<p style="text-align: right;">Page 84</p> <p>1 G Maxwell - Confidential</p> <p>2 30 girls --</p> <p>3 A. I did not count the number of girls</p> <p>4 and I did read the police report. I can only</p> <p>5 testify to what I read.</p> <p>6 Q. So you are aware that the police</p> <p>7 report contains reports from 30 underage</p> <p>8 girls?</p> <p>9 A. I can't testify to what the girls</p> <p>10 said. I can only testify to the fact that I</p> <p>11 read a police report that stated that.</p> <p>12 Q. Were you working for Jeffrey -- you</p> <p>13 said you worked for him off an on until 2009,</p> <p>14 is that correct?</p> <p>15 A. I helped out from time to time.</p> <p>16 Q. So you were working with him during</p> <p>17 the time period when these underage girls</p> <p>18 were visiting Jeffrey's home?</p> <p>19 MR. PAGLIUCA: Objection to the</p> <p>20 form and foundation.</p> <p>21 A. I was not -- what year, I need</p> <p>22 years.</p> <p>23 Q. How about let's say 2005?</p> <p>24 A. I'm not sure I was at the house at</p> <p>25 all in 2005, maybe one day, maybe.</p>
<p style="text-align: right;">Page 83</p> <p>1 G Maxwell - Confidential</p> <p>2 Epstein ever having sex with an underage</p> <p>3 minor and asking them to pinch his nipples?</p> <p>4 A. I am not.</p> <p>5 Q. So I'm going to direct you to, I</p> <p>6 believe it's Maxwell Exhibit 1, the police</p> <p>7 report.</p> <p>8 Are you aware that over 30 under</p> <p>9 age minors gave testimony to police that they</p> <p>10 were engaged in sexual acts during,</p> <p>11 quote-unquote, massages.</p> <p>12 MR. PAGLIUCA: The witness needs to</p> <p>13 find Exhibit 1. Exhibit 1 -- if you can</p> <p>14 hand me that please.</p> <p>15 Q. So now with respect to the police</p> <p>16 report, are you aware that over 30 underage</p> <p>17 girls, meaning under the age of 18 gave</p> <p>18 reports to police that they were assaulted</p> <p>19 sexually by Jeffrey Epstein during massages?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I read the police report. That's</p> <p>23 all I can testify to.</p> <p>24 Q. Are you aware of what is in the</p> <p>25 police report? Are you aware that there were</p>	<p style="text-align: right;">Page 85</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. How about 2004?</p> <p>3 A. I was present for his mother's --</p> <p>4 his mother died in 2004 so I was there for</p> <p>5 his mother's death and the funeral and I was</p> <p>6 at the house maybe a handful of days, again.</p> <p>7 Q. I would like to direct you to, you</p> <p>8 have it pulled together now, it's page 39,</p> <p>9 Bates stamped Giuffre 00040?</p> <p>10 A. Can you repeat that, please.</p> <p>11 Q. Sure. 00040.</p> <p>12 A. Yes.</p> <p>13 Q. At the top of that document, about</p> <p>14 three lines down, you see the redacted</p> <p>15 portions where there is black so it blacks</p> <p>16 out the name.</p> <p>17 A. I see black redacted portions.</p> <p>18 Q. That's a black redaction of the</p> <p>19 name of the minor and there is -- I will</p> <p>20 represent for the record that's what it is.</p> <p>21 You can contest that but I'm not asking about</p> <p>22 the name of the minor.</p> <p>23 Five lines down, it says, She was</p> <p>24 just 16 years of age.</p> <p>25 Do you see that?</p>



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1 G Maxwell - Confidential  
 2 A. I have to read that, if you want me  
 3 to testify to some things.  
 4 Q. I'm asking if you see where it  
 5 says, She was just 16 years old.  
 6 A. No, I have to read it.  
 7 Q. It's five line downs on the first  
 8 paragraph.  
 9 A. I do see that.  
 10 Q. Then the next paragraph down, it  
 11 says, this is the next full paragraph, it  
 12 says, Epstein entered the room, introduced  
 13 himself, Epstein lay on the table and told  
 14 her to get comfortable, blank could not  
 15 remember if he was naked or if he entered the  
 16 room with a towel. Blank stated she provided  
 17 the massage wearing her panties. She  
 18 continued rubbing his thighs and feet. Blank  
 19 advised he turned over on his back and  
 20 continued to rub his legs with oil. Epstein  
 21 touched her breast and began to masturbate.  
 22 I asked if she knew what circumcised and  
 23 uncircumcised meant. She stated circumcised  
 24 is when the penis had no foreskin.  
 25 Then jumping down to the next

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1 G Maxwell - Confidential  
 2 paragraph, it says, Blank became upset,  
 3 crying hysterically and stated she was paid  
 4 and also instructed to have sex with Epstein  
 5 and Nadia Marcinkova by Epstein.  
 6 Do you see that there?  
 7 A. I do.  
 8 Q. Are you aware that there were  
 9 underage minors in the Palm Beach house that  
 10 were required to give sexual massages to  
 11 Jeffrey Epstein?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation. This has been  
 14 asked and answered already. Now you are  
 15 just reading a document.  
 16 MS. McCAWLEY: I am allowed to take  
 17 this deposition.  
 18 A. I already testified --  
 19 Q. Are you aware there were underage  
 20 girls, 30 of them, in this police report that  
 21 were assaulted by Jeffrey Epstein in the Palm  
 22 Beach house during the time you are working  
 23 there?  
 24 A. I am aware that Virginia has  
 25 lied repeatedly --

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1 G Maxwell - Confidential  
 2 Q. I'm not asking about Virginia. I'm  
 3 asking if you are aware that there were over  
 4 30 underage girls who gave reports to police  
 5 officers during the time you worked for  
 6 Jeffrey Epstein. Are you aware of that?  
 7 MR. PAGLIUCA: Counsel, what is  
 8 your factual basis for asserting there  
 9 are 30 underaged people who gave  
 10 reports?  
 11 MS. McCAWLEY: I don't have to  
 12 answer that.  
 13 MR. PAGLIUCA: Are you representing  
 14 as an officer of the court that you have  
 15 personal knowledge that there are 30  
 16 people referenced in these police  
 17 reports?  
 18 MS. McCAWLEY: That's my  
 19 understanding, that there are 30 girls.  
 20 MR. PAGLIUCA: How is that your  
 21 understanding if these are redacted  
 22 reports?  
 23 MS. McCAWLEY: By reading through  
 24 the reports.  
 25 MR. PAGLIUCA: So you have personal

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1 G Maxwell - Confidential  
 2 knowledge there are 30 people --  
 3 MS. McCAWLEY: Just like can you if  
 4 you read through -- I will not argue  
 5 with you counsel.. she can answer yes or  
 6 no.  
 7 Q. Are you aware there were over 30  
 8 individuals who were minors who gave reports  
 9 to police just like the one we just read that  
 10 they were sexually assaulted by Jeffrey  
 11 Epstein in the Palm Beach home during the  
 12 years that you were working with him?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation. You can answer if  
 15 you have knowledge.  
 16 A. I already testified I was limited  
 17 in the house, a couple of days, there is no  
 18 way I knew. I have read these reports. I  
 19 cannot testify to 30. Given the experience  
 20 I've had with Virginia's lies, it's very hard  
 21 for me to testify about what I see. I can  
 22 tell from you my personal knowledge I did not  
 23 know what you are referring to.  
 24 Q. You did not know there were  
 25 underage girls in the home that were being

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<p>1 G Maxwell - Confidential</p> <p>2 assaulted by Jeffrey Epstein during the time</p> <p>3 you were working there?</p> <p>4 A. Based on the lies that I have</p> <p>5 already been told, I cannot comment on any --</p> <p>6 Q. Are you saying these 30 girls are</p> <p>7 lying when they gave these reports to police</p> <p>8 officers?</p> <p>9 A. I'm not testifying to their lies.</p> <p>10 I'm testifying to Virginia's lies.</p> <p>11 Q. I am not asking about Virginia's</p> <p>12 lies.</p> <p>13 A. I can only testify to Virginia's</p> <p>14 lies. I can testify to having read these</p> <p>15 reports. I cannot testify to anything else</p> <p>16 about them.</p> <p>17 Q. So your testimony is that during</p> <p>18 the time you were working there, you did not</p> <p>19 know that these minor children were being</p> <p>20 abused in the home while you were there?</p> <p>21 A. What I have already told you and I</p> <p>22 will repeat, I was in the house very limited</p> <p>23 times, very few times. I do not know what</p> <p>24 you are referring to. I've read these</p> <p>25 reports but based on the lies that Virginia</p>	<p>1 G Maxwell - Confidential</p> <p>2 Q. In your responsibilities in working</p> <p>3 for Jeffrey, would you book massages for him</p> <p>4 on any given day so that he would have a</p> <p>5 massage scheduled? Would you take a call for</p> <p>6 example and book a massage for him?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 Q. You can answer.</p> <p>10 A. Typically, that was not my</p> <p>11 responsibility. He would either book the</p> <p>12 massage himself or one of his other</p> <p>13 assistants would do that.</p> <p>14 Q. From time to time you had to do</p> <p>15 that?</p> <p>16 MR. PAGLIUCA: Objection to the</p> <p>17 form and foundation.</p> <p>18 A. Like I said, typically it was</p> <p>19 somebody else's responsibility.</p> <p>20 Q. If you were unable to book a girl</p> <p>21 for a massage on a given day, would that mean</p> <p>22 that you were responsible for giving him a</p> <p>23 sexual massage?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation and I instruct you</p>
Page 91	Page 93
<p>1 G Maxwell - Confidential</p> <p>2 has perpetrated, cannot tell you what is true</p> <p>3 or factual or not.</p> <p>4 Q. You said you were in the home a</p> <p>5 very limited time, so average in the year for</p> <p>6 example, 2004, how many times would you have</p> <p>7 been in his Palm Beach home?</p> <p>8 A. Very hard for me to state but very</p> <p>9 little.</p> <p>10 Q. How about his New York home?</p> <p>11 A. Same.</p> <p>12 Q. Were you his girlfriend in that</p> <p>13 year, in 2004?</p> <p>14 A. Define what you mean by girlfriend.</p> <p>15 Q. Were you in a relationship with him</p> <p>16 where you would consider yourself his</p> <p>17 girlfriend?</p> <p>18 A. No.</p> <p>19 Q. Did you ever consider yourself his</p> <p>20 girlfriend?</p> <p>21 A. That's a tricky question. There</p> <p>22 were times when I would have liked to think</p> <p>23 of myself as his girlfriend.</p> <p>24 Q. When would that have been?</p> <p>25 A. Probably in the early '90s.</p>	<p>1 G Maxwell - Confidential</p> <p>2 not to answer any questions about any of</p> <p>3 your consensual adult sexual activity.</p> <p>4 Q. So you are not going to answer that</p> <p>5 question?</p> <p>6 A. You just heard my counsel.</p> <p>7 Q. Have you ever said to anybody that</p> <p>8 recruiting other girls to perform sexual</p> <p>9 massages for Jeffrey Epstein takes the</p> <p>10 pressure off you?</p> <p>11 MR. PAGLIUCA: Object to the form</p> <p>12 and foundation.</p> <p>13 A. Repeat the question and break it</p> <p>14 out.</p> <p>15 Q. Have you ever said to anybody that</p> <p>16 you recruit girls --</p> <p>17 A. Stop right there. I never</p> <p>18 recruited girls, let's stop there. Now</p> <p>19 breakdown the question.</p> <p>20 Q. Have you ever said to anybody --</p> <p>21 A. By girls, we are talking about</p> <p>22 underage people -- you said girls, are you</p> <p>23 talking about underage -- we are not talking</p> <p>24 about consensual acts -- this is a defamation</p> <p>25 suit.</p>

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1 G Maxwell - Confidential  
2 Q. I'm asking the questions. I know  
3 what this case is about. I'm trying to -- I  
4 will ask you questions if you don't  
5 understand the question I can break it down  
6 for you. I'm happy to do that.  
7 A. Break it down a lot please.  
8 Q. I will do that.  
9 The question is, have you ever said  
10 to anybody that you recruit other girls --  
11 A. Why don't you stop there.  
12 Q. Let me finish my question.  
13 Have you ever said to anybody that  
14 you recruit girls to take the pressure off  
15 you, so you won't have to have sex with  
16 Jeffrey, have you said that?  
17 That's the question?  
18 A. You don't ask me questions like  
19 that. First of all, you are trying to trap  
20 me, I will not be trapped. You are asking me  
21 if I recruit, I told you no. Girls meaning  
22 underage, I already said I don't do that with  
23 underage people and as to ask me about a  
24 specific conversation I had with language, we  
25 talking about almost 17 years ago when this

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1 G Maxwell - Confidential  
2 took place. I cannot testify to an actual  
3 conversation or language that I used with  
4 anybody at any time.  
5 Q. Have you ever said to anybody that  
6 you recruit other females over the age of 18  
7 to take the pressure off you to having to  
8 have sex with Jeffrey?  
9 A. I totally resent and find it  
10 disgusting that you use the word recruit. I  
11 already told you I don't know what you are  
12 saying about that and your implication is  
13 repulsive.  
14 Q. Answer my question.  
15 A. I just did.  
16 Q. Have you ever said to anybody that  
17 you recruit females --  
18 A. I don't recruit anybody.  
19 Q. That's an answer. So you never  
20 said that?  
21 A. I'm testifying that I cannot  
22 testify to an actual language --  
23 Q. It's a yes or no.  
24 A. I will not testify to an actual  
25 statement made 17 years ago, so I cannot

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1 G Maxwell - Confidential  
2 testify to actual language.  
3 Q. So you won't testify to anything  
4 I'm asking you 17 years ago about a statement  
5 you made. How do you know it's 17 years ago?  
6 A. We are talking about a time in  
7 2000, right?  
8 Q. Have you ever said that to anybody?  
9 A. I'm 54 years old so you are asking  
10 me in my entire life, what words are you  
11 asking me in my entire life?  
12 Q. Your entire life is limited by the  
13 time you were with Jeffrey, this is the  
14 question.  
15 A. Let's time limit the question you  
16 are asking me.  
17 Q. So from, let's say, I think you  
18 said you started with him in 1992, is that  
19 correct, and finished with him in 2009.  
20 So from 1992 to 2009 have you ever  
21 said to anybody that you recruit other and we  
22 will start with girls to take the pressure  
23 off you to have sex with Jeffrey?  
24 MR. PAGLIUCA: Objection to the  
25 form and foundation.

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1 G Maxwell - Confidential  
2 A. First of all I resent and despise  
3 the world recruit. Would you like to define  
4 what you mean by recruit and by girls, you  
5 mean underage people. I never had to do  
6 anything with underage people. So why don't  
7 you reask the question in a way that I am  
8 able to answer it.  
9 Q. I'm asking if you ever said that to  
10 anybody. So if you don't understand the word  
11 recruit and you never used that word then the  
12 answer to that question would be no.  
13 A. I have no memory as I sit here  
14 today having used that word.  
15 Q. Did you ever meet an underage girl  
16 in London to introduce her to Jeffrey to  
17 provide him with a massage?  
18 MR. PAGLIUCA: Objection to the  
19 form and foundation.  
20 A. Run that past me one more time.  
21 Q. Did you ever meet an underage girl  
22 in London to introduce her to Jeffrey to  
23 perform a massage?  
24 MR. PAGLIUCA: Same objection.  
25 A. Are you asking me if I met anybody

<p style="text-align: right;">Page 98</p> <p>1 G Maxwell - Confidential</p> <p>2 that was underage in London specifically to</p> <p>3 provide a massage to Jeffrey, is that your</p> <p>4 question?</p> <p>5 Q. Yes.</p> <p>6 A. No.</p> <p>7 Q. Do you know who Alexander Dixon is?</p> <p>8 A. I don't recall her right now.</p> <p>9 Q. Do you know if -- strike that.</p> <p>10 During the time that you were</p> <p>11 working for Jeffrey, did you ever observe any</p> <p>12 foreign females, so in other words, not from</p> <p>13 the United States, that were brought to</p> <p>14 Jeffrey's home to perform massages?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. Females, what age are we talking?</p> <p>18 Q. Any age.</p> <p>19 A. Can you repeat the question?</p> <p>20 Q. During the time you were working</p> <p>21 for Jeffrey, did you ever observe any foreign</p> <p>22 females of any age that were at Jeffrey's</p> <p>23 home to perform a massage?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>	<p style="text-align: right;">Page 100</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 A. I already testified about not</p> <p>4 knowing about underage girls.</p> <p>5 Q. Did you provide any assistance with</p> <p>6 obtaining visas for foreign girls that were</p> <p>7 under the age of 18?</p> <p>8 A. I've never participated in helping</p> <p>9 people of any age to get visas.</p> <p>10 Q. Did Jeffrey, was it Jeffrey's</p> <p>11 preference to start a massage with sex?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. I think you should ask that</p> <p>15 question of Jeffrey.</p> <p>16 Q. Do you know?</p> <p>17 A. I don't believe that was his</p> <p>18 preference. I think -- you have to</p> <p>19 understand, a massage -- perhaps you are not</p> <p>20 really familiar with what massage is.</p> <p>21 Q. I am, I don't need a lecture on</p> <p>22 massage.</p> <p>23 A. I think you do.</p> <p>24 MR. PAGLIUCA: No question pending.</p> <p>25 She will ask you another question now.</p>
<p style="text-align: right;">Page 99</p> <p>1 G Maxwell - Confidential</p> <p>2 A. Are you asking me if any foreigner,</p> <p>3 not an American person, gave Jeffrey a</p> <p>4 massage?</p> <p>5 Q. Yes.</p> <p>6 A. Well, as I sit here today, I can't</p> <p>7 think of anyone who is foreign. Certainly --</p> <p>8 I just can't think of anybody right this</p> <p>9 second.</p> <p>10 Q. How about any foreign girls who</p> <p>11 were under the age of 18?</p> <p>12 A. I already testified to not knowing</p> <p>13 anything about underage girls.</p> <p>14 Q. Were there foreign girls who were</p> <p>15 brought to Jeffrey's home by Jean Luc Brunel</p> <p>16 for the purposes of providing massages?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I am not aware of Jean Luc bringing</p> <p>20 girls. I have not no idea what you are</p> <p>21 talking about.</p> <p>22 Q. You have never been around foreign</p> <p>23 girls who are under the age of 18 at</p> <p>24 Jeffrey's homes?</p> <p>25 MR. PAGLIUCA: Objection to the</p>	<p style="text-align: right;">Page 101</p> <p>1 G Maxwell - Confidential</p> <p>2 A. Massage is for health benefits.</p> <p>3 Q. When did you first meet Jeffrey?</p> <p>4 A. Some point in 1991.</p> <p>5 Q. And did Jeffrey know your father?</p> <p>6 A. No.</p> <p>7 Q. How were you introduced to Jeffrey?</p> <p>8 A. Some friend introduced us.</p> <p>9 Q. Can you describe your relationship</p> <p>10 back in 1991, was it friendship or was it</p> <p>11 girlfriend relationship or was it a work</p> <p>12 relationship, what was your relationship in</p> <p>13 1991?</p> <p>14 A. It was just friendly.</p> <p>15 Q. Then I believe you testified you</p> <p>16 began working for him in 1992, is that</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. In 1992 I know you gave me the</p> <p>20 description of the work that you were</p> <p>21 performing for him, how much was he paying</p> <p>22 you, do you remember?</p> <p>23 A. I don't recall.</p> <p>24 Q. Do you know for example in 2001 how</p> <p>25 much he was paying you?</p>



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<p>1 G Maxwell - Confidential</p> <p>2 A. I don't recall.</p> <p>3 Q. Did it change over the years or did</p> <p>4 the payment remain the same?</p> <p>5 A. I believe over the course of time</p> <p>6 it increased a little bit.</p> <p>7 Q. Was that the -- was that payment</p> <p>8 the payment that -- was the payment made with</p> <p>9 respect to the jobs, the work you were</p> <p>10 performing for Jeffrey, was that your sole</p> <p>11 income at that time?</p> <p>12 MR. PAGLIUCA: I object to the</p> <p>13 form. I'm also going to instruct you</p> <p>14 not to answer about sources of -- your</p> <p>15 personal sources of income outside of</p> <p>16 Mr. Epstein at all.</p> <p>17 MS. McCAWLEY: What's the basis for</p> <p>18 that?</p> <p>19 MR. PAGLIUCA: It's confidential,</p> <p>20 it's not part of this lawsuit.</p> <p>21 MS. McCAWLEY: We have a protective</p> <p>22 order and it is part of this lawsuit</p> <p>23 with respect to our damage claims.</p> <p>24 MR. PAGLIUCA: It's not and, in</p> <p>25 fact, you are not entitled to ask</p>	<p>1 G Maxwell - Confidential</p> <p>2 worked for it and I had a loan, we did loans.</p> <p>3 Q. So a loan through Jeffrey?</p> <p>4 A. I don't recall the exact</p> <p>5 transaction.</p> <p>6 Q. Did he purchase for you a</p> <p>7 helicopter during the time you were working</p> <p>8 for him?</p> <p>9 A. It was his helicopter.</p> <p>10 Q. When did you obtain your pilot</p> <p>11 license?</p> <p>12 A. I believe it was '98 or '99.</p> <p>13 Q. Was that for both airplanes and</p> <p>14 helicopters or just helicopters?</p> <p>15 A. Just helicopters.</p> <p>16 Q. Have you ever flown President</p> <p>17 Clinton on your helicopter?</p> <p>18 A. That is another one of Virginia's</p> <p>19 lies.</p> <p>20 Q. The question is have you ever done</p> <p>21 that?</p> <p>22 A. I have never flown President</p> <p>23 Clinton at any time ever, in any helicopter,</p> <p>24 in any place, any time, in any state, in any</p> <p>25 country, at any time anywhere.</p>
Page 103	Page 105
<p>1 G Maxwell - Confidential</p> <p>2 financial information of a defendant in</p> <p>3 this kind of case, in a defamation case</p> <p>4 unless and until there is a finding that</p> <p>5 you are entitled to punitive damages.</p> <p>6 That is clear in New York case law, both</p> <p>7 state and Federal.</p> <p>8 MS. McCAWLEY: We disagree on that</p> <p>9 point and we will come back to that.</p> <p>10 Q. From the source of payment from the</p> <p>11 source of Jeffrey, from your work, can you</p> <p>12 give me a range on that, do you know was it</p> <p>13 over \$100,000?</p> <p>14 A. I just testified I don't recall.</p> <p>15 Q. You don't don't know if it was</p> <p>16 \$500,000?</p> <p>17 A. It was less than that.</p> <p>18 Q. Somewhere between 100 and 500,</p> <p>19 would that be fair to say?</p> <p>20 A. I believe it was between 100 and</p> <p>21 \$200,000.</p> <p>22 Q. Did Jeffrey during the time that</p> <p>23 you were working for him purchase a town home</p> <p>24 for you?</p> <p>25 A. The subject of the townhouse is, I</p>	<p>1 G Maxwell - Confidential</p> <p>2 Q. Have you ever had dinner with</p> <p>3 President Clinton at Jeffrey's home, at any</p> <p>4 of Jeffrey's homes?</p> <p>5 A. No, I don't believe so.</p> <p>6 Q. Have you traveled on Jeffrey's</p> <p>7 planes with President Clinton?</p> <p>8 A. Yes, I have.</p> <p>9 Q. Would that have been in 2002?</p> <p>10 A. It's very hard for me to recollect</p> <p>11 exact dates but that sounds about right.</p> <p>12 Q. Was that during the time that</p> <p>13 Virginia was working for Jeffrey?</p> <p>14 A. I don't know that Virginia ever did</p> <p>15 work for Jeffrey. I don't exactly know if</p> <p>16 she testified to her so-called duties, we</p> <p>17 know she is a serial liar so I can't testify</p> <p>18 to what she did or didn't do. So I object to</p> <p>19 that characterization of her. So repeat the</p> <p>20 question, please.</p> <p>21 Q. Can you read the question back?</p> <p>22 (Record read.)</p> <p>23 Q. You can answer the question.</p> <p>24 A. What was the question again?</p> <p>25 Q. When you were traveling on the</p>



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<p>1 G Maxwell - Confidential</p> <p>2 plane with President Clinton, was that during</p> <p>3 the time, it was 2002, that you were on a</p> <p>4 flight with Clinton, was that during the time</p> <p>5 Virginia was working for Jeffrey?</p> <p>6 MR. PAGLIUCA: Object to the form.</p> <p>7 Misstates the witness' answer and if you</p> <p>8 can answer the question, you can answer</p> <p>9 it.</p> <p>10 A. Well, like I said, I don't recall</p> <p>11 exactly when I flew with him. I don't recall</p> <p>12 when Virginia, we know what Virginia claims</p> <p>13 when she left, so I can't answer the</p> <p>14 question. I have no idea.</p> <p>15 Q. Do you know Prince Andrew?</p> <p>16 A. I do.</p> <p>17 Q. How long have you known him?</p> <p>18 A. A very long time.</p> <p>19 Q. Since you were a child?</p> <p>20 A. I really -- it's so long, it's</p> <p>21 really a long time ago. I just don't recall.</p> <p>22 Q. Do you remember how you first met</p> <p>23 him?</p> <p>24 A. No, I do not.</p> <p>25 Q. Did you introduce him to Jeffrey?</p>	<p>1 G Maxwell - Confidential</p> <p>2 that he may have met socially through me.</p> <p>3 Q. Did you ever introduce Prince</p> <p>4 Andrew to Virginia in London?</p> <p>5 A. I understand her story about London</p> <p>6 but again, her tissue of lies is extremely</p> <p>7 hard to pick apart what is true and what</p> <p>8 isn't. Actually I wouldn't recollect her at</p> <p>9 all but for her tissue stories about this</p> <p>10 situation.</p> <p>11 Q. So did you ever introduce Prince</p> <p>12 Andrew to Virginia in London?</p> <p>13 A. I have no recollection.</p> <p>14 Q. Did Virginia ever stay at your home</p> <p>15 in London, your town home?</p> <p>16 A. I know she claims she did but if</p> <p>17 you are asking me here today to remember</p> <p>18 specifically, I cannot.</p> <p>19 Q. Do you remember taking a trip with</p> <p>20 Virginia to travel over to Europe, including</p> <p>21 London?</p> <p>22 A. So I have seen her reports and I</p> <p>23 have seen the plane reports. I see she says</p> <p>24 she was on that but again, I really have no</p> <p>25 recollection of her.</p>
Page 107	Page 109
<p>1 G Maxwell - Confidential</p> <p>2 A. That would be another of Virginia's</p> <p>3 lies and the lies you perpetrate. I never</p> <p>4 introduced Prince Andrew to Jeffrey Epstein</p> <p>5 at any time ever, so just add that the to</p> <p>6 long list of lies.</p> <p>7 Q. Did Jeffrey know Prince Andrew?</p> <p>8 A. Clearly he knew him. I think we</p> <p>9 have that answer but how -- yeah.</p> <p>10 Q. Do you know how Jeffrey met Prince</p> <p>11 Andrew?</p> <p>12 A. I do not know Jeffrey met Prince</p> <p>13 Andrew. What I do know is that I did not</p> <p>14 introduce them. That is one of the many</p> <p>15 lies. Are we tallying all the lies?</p> <p>16 Q. Do you know when Jeffrey met Prince</p> <p>17 Andrew?</p> <p>18 A. I do not know when Jeffrey met</p> <p>19 Prince Andrew.</p> <p>20 Q. Did you ever introduce Prince</p> <p>21 Andrew to any girls under the age of 18 who</p> <p>22 were not friends of yours children?</p> <p>23 A. I have not introduced Prince Andrew</p> <p>24 to anyone that I am aware of other than</p> <p>25 friends of mine who have kids under that age</p>	<p>1 G Maxwell - Confidential</p> <p>2 Q. Did you know that she was 17 at the</p> <p>3 time of that trip?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 A. I have --</p> <p>7 Q. Did you know she was 17 at the time</p> <p>8 of that trip?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 A. I didn't even know she was on the</p> <p>12 trip.</p> <p>13 Q. Did you hold her passport for her</p> <p>14 when she was traveling?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. I have no recollection whatsoever</p> <p>18 of her even being on the trip nor holding her</p> <p>19 passport.</p> <p>20 (Maxwell Exhibit 4, picture, marked</p> <p>21 for identification.)</p> <p>22 Q. I'm showing you what we marked as</p> <p>23 Maxwell Exhibit 4.</p> <p>24 Can you take a look at that picture</p> <p>25 for me?</p>

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1 G Maxwell - Confidential  
 2 A. I've looked at it.  
 3 Q. Are you in that picture?  
 4 A. I am.  
 5 Q. Is that Prince Andrew in the  
 6 picture as well?  
 7 A. It is.  
 8 MR. PAGLIUCA: I don't believe this  
 9 has been produced to us in discovery by  
 10 you.  
 11 MS. McCAWLEY: The picture?  
 12 MR. PAGLIUCA: Yes.  
 13 MS. McCAWLEY: It has.  
 14 MS. MENNINGER: Is it the same  
 15 exact photograph.  
 16 MS. McCAWLEY: I believe so. We  
 17 will find one. The picture has been  
 18 produced a number of times.  
 19 MR. PAGLIUCA: I've seen different  
 20 iterations of this, I don't believe I  
 21 have ever seen this.  
 22 MS. McCAWLEY: We had them blow it  
 23 up on a page so she could see it. We  
 24 could use an article.  
 25 While you are looking for that, I

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1 G Maxwell - Confidential  
 2 will skip ahead. Hold that until we can  
 3 find one that has the Bates range on it.  
 4 Q. Do you recall Virginia being at  
 5 your London town home?  
 6 A. I do not.  
 7 Q. Do you recall going to dinner with  
 8 Prince Andrew, Jeffrey Epstein and Virginia  
 9 Roberts in London, at any time?  
 10 A. I do not.  
 11 Q. Do you recall going to a place  
 12 called Club Tramp with Prince Andrew, Jeffrey  
 13 Epstein and yourself and Virginia Roberts?  
 14 A. I would just like to state for the  
 15 record that Prince Andrew is a very famous  
 16 person, I know you are aware because you like  
 17 to use him so often in your press stories --  
 18 please let me finish. Were he at Tramp, at  
 19 any time, that would be reported by the  
 20 press. I do not have any recollection of it  
 21 and I doubt it actually happened.  
 22 Q. You don't recall that.  
 23 Do you recall taking Virginia  
 24 shopping when you were in London to buy an  
 25 outfit to meet Prince Andrew?

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1 G Maxwell - Confidential  
 2 A. No, I don't.  
 3 Q. Where in your town home -- we will  
 4 come back to that.  
 5 Do you have guest bedrooms in your  
 6 town home in London?  
 7 A. I do.  
 8 Q. How many?  
 9 A. Two.  
 10 Q. Did Prince Andrew ever visit  
 11 Jeffrey and you in New York?  
 12 A. Yes.  
 13 Q. Do you remember him visiting you  
 14 and Jeffrey in New York in the spring of  
 15 2001?  
 16 A. Again, I can't testify to any  
 17 specific dates.  
 18 Q. So you don't have a recollection of  
 19 that?  
 20 A. I have a recollection -- you've  
 21 asked me if I have a recollection of being in  
 22 New York but if you are asking for a date, I  
 23 cannot confirm that date.  
 24 Q. Do you remember Prince Andrew being  
 25 present in New York for a party where Johanna

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1 G Maxwell - Confidential  
 2 Sjoberg was also present?  
 3 A. I don't recollect.  
 4 Q. Do you recall ever giving Prince  
 5 Andrew a gift of a puppet that was in the  
 6 same -- that looked like him?  
 7 A. I never gave him a gift of a  
 8 puppet.  
 9 Q. Did Jeffrey ever give him a gift of  
 10 a puppet?  
 11 A. No, not that I am aware of.  
 12 Q. Have you ever given him any gifts?  
 13 MR. PAGLIUCA: Objection,  
 14 foundation.  
 15 A. I know Andrew --  
 16 Q. Have you ever given him any gifts  
 17 that you remember when he came to Jeffrey's  
 18 home in New York?  
 19 A. I don't recall giving him any gifts  
 20 in New York.  
 21 (Maxwell Exhibit 5, picture, marked  
 22 for identification.)  
 23 Q. I think I directed you to page  
 24 0034.  
 25 Is that a picture that was taken at

<p style="text-align: right;">Page 114</p> <p>1 G Maxwell - Confidential</p> <p>2 your London town home?</p> <p>3 A. I have no idea what this picture</p> <p>4 was taken. I know what she purports it to be</p> <p>5 but I'm not going to say that I do.</p> <p>6 Q. Do the surroundings look like your</p> <p>7 London town home?</p> <p>8 A. They are familiar.</p> <p>9 Q. Do you know who took this picture?</p> <p>10 A. I do not.</p> <p>11 Q. Did Jeffrey Epstein take the</p> <p>12 picture?</p> <p>13 A. I just testified I don't know who</p> <p>14 took the picture.</p> <p>15 Q. So you don't know if Jeffery</p> <p>16 Epstein took the picture?</p> <p>17 A. When I tell you I don't know who</p> <p>18 took the picture, it doesn't mean him -- I</p> <p>19 don't know who took the picture. You can</p> <p>20 come up with 50 names, I still do not know</p> <p>21 who took the picture.</p> <p>22 Q. Did you observe Prince Andrew go</p> <p>23 into a room with Virginia alone in your town</p> <p>24 home?</p> <p>25 A. I cannot recall. As I have said,</p>	<p style="text-align: right;">Page 116</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Were you present on the island when</p> <p>3 Prince Andrew visited?</p> <p>4 A. Yes.</p> <p>5 Q. How many times?</p> <p>6 A. I can only remember once.</p> <p>7 Q. Were there any girls under the age</p> <p>8 of 18 on the island during that one visit</p> <p>9 that you remember that were not family or</p> <p>10 friends of or daughters of your friends?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. There were no girls on the island</p> <p>14 at all. No girls, no women, other than the</p> <p>15 staff who work at the house. Girls meaning,</p> <p>16 I assume you are asking underage, but there</p> <p>17 was nobody female outside of the cooks and</p> <p>18 the cleaners.</p> <p>19 Q. Did you, as part of your duties in</p> <p>20 working for Jeffrey, ever arrange for</p> <p>21 Virginia to have sex with John Luc Brunel?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. Just for the record, I have never</p> <p>25 at any time, at anyplace, in any moment ever</p>
<p style="text-align: right;">Page 115</p> <p>1 G Maxwell - Confidential</p> <p>2 no.</p> <p>3 Q. Did Prince Andrew ever tell you</p> <p>4 that he had sex with Virginia Roberts?</p> <p>5 A. He did not.</p> <p>6 Q. Did Jeffrey Epstein ever tell you</p> <p>7 that Prince Andrew had sex with Virginia</p> <p>8 Roberts?</p> <p>9 A. He did not.</p> <p>10 Q. Did Prince Andrew ever visit -- let</p> <p>11 me back up for a moment. We talked about</p> <p>12 Jeffrey's homes, did Jeffrey have a home in</p> <p>13 the U.S. Virgin islands called Little St.</p> <p>14 James?</p> <p>15 A. Yes.</p> <p>16 Q. Did Prince Andrew ever visit that</p> <p>17 island -- are you aware of Prince Andrew ever</p> <p>18 visiting Jeffrey's island?</p> <p>19 A. I am aware of that, yes.</p> <p>20 Q. Do you know how many times he</p> <p>21 visited?</p> <p>22 A. I do not.</p> <p>23 Q. Do you know if he visited when</p> <p>24 Virginia was on the island?</p> <p>25 A. I do not.</p>	<p style="text-align: right;">Page 117</p> <p>1 G Maxwell - Confidential</p> <p>2 asked Virginia Roberts or whatever she is</p> <p>3 called now to have sex with anybody.</p> <p>4 Q. Did you ever provide Virginia</p> <p>5 Roberts with an outfit, an outfit of a sexual</p> <p>6 nature to wear for Les Wexner?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. I think we addressed the outfit</p> <p>10 issue.</p> <p>11 Q. I am asking you if you ever</p> <p>12 provided her with an outfit of a sexual</p> <p>13 nature to wear for Les Wexner?</p> <p>14 A. Categorically no. You did get</p> <p>15 that, I said categorically no</p> <p>16 Q. Don't worry I'm paying attention.</p> <p>17 A. You seemed very distracted in that</p> <p>18 moment.</p> <p>19 (Maxwell Exhibit 6, flight logs,</p> <p>20 marked for identification.)</p> <p>21 A. Do you mind if I take a break for</p> <p>22 the bathroom.</p> <p>23 Q. It's 11:08 and we are going to go</p> <p>24 off the record now.</p> <p>25 THE VIDEOGRAPHER: It's now 11:09.</p>

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1 G Maxwell - Confidential  
 2 We are off the record.  
 3 (Recess.)  
 4 THE VIDEOGRAPHER: It's now 11:26,  
 5 we are back on the record and starting  
 6 disk No. 3.  
 7 Q. Ms. Maxwell, I think I handed you  
 8 right before the break, did I hand you the  
 9 flight logs, they look like this. Did I mark  
 10 those yet, I thought I did.  
 11 A. I don't believe I have it.  
 12 Q. These admittedly are a little  
 13 difficult to read so what I'm going to  
 14 provide you with to assist is I have a chart  
 15 that has the airport codes, because it will  
 16 have, for example, just for the record  
 17 reflects that the first page of document  
 18 [REDACTED] it will have a code in the from line  
 19 that says PBI, for example, to TEB so I a  
 20 chart that matches up, just in case you don't  
 21 understand what those letters mean, PBI  
 22 meaning Palm Beach, TEB meaning Teterboro,  
 23 which is New Jersey, but others are more  
 24 difficult but just for you to be able to  
 25 understand the logs, I will provide you with

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1 G Maxwell - Confidential  
 2 that.  
 3 MR. PAGLIUCA: So we are clear, if  
 4 the witness has personal knowledge of  
 5 what these are that's fine but I don't  
 6 know what these are and I don't expect  
 7 the witness to accept the representation  
 8 that they are what they are.  
 9 MS. McCAWLEY: If she can testify  
 10 to what city it is, she can state that  
 11 on the record.  
 12 MR. PAGLIUCA: If she knows what it  
 13 is, she knows what it is, we are not  
 14 putting any affirmatively on the record  
 15 until you ask your questions.  
 16 Q. So I'm going to ask you and I think  
 17 we flagged a few of the pages which may  
 18 direct us a little bit easier but I will do  
 19 it by Bates number which is at the bottom of  
 20 the document kind of at the side.  
 21 The first I will direct your  
 22 attention to is [REDACTED]  
 23 A. Does it have a tab?  
 24 Q. It should. Let me make sure.  
 25 A. Yes it does.

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1 G Maxwell - Confidential  
 2 Q. So I'm directing your attention to  
 3 the bottom, two lines up from the bottom,  
 4 there is a flight --  
 5 MR. PAGLIUCA: Are you on [REDACTED]  
 6 MS. McCAWLEY: [REDACTED]  
 7 Q. So this flight is from, the one I'm  
 8 looking at, I think it's highlighted on your  
 9 copy. On the far corner on the date, it says  
 10 [REDACTED] at the top and this would be the [REDACTED]  
 11 and then the [REDACTED] are the two I'm going to  
 12 direct your attention to.  
 13 Q. On that first one on the [REDACTED] you  
 14 will see the column reading PBI in the from  
 15 column to TEB in the to column and you will  
 16 see some initials, you will see JE for  
 17 Jeffrey Epstein, GM for Ghislaine Maxwell, ET  
 18 for Emmy Taylor and then Virginia?  
 19 A. I have to object.  
 20 MR. PAGLIUCA: You don't get to  
 21 object.  
 22 Q. She is turning into a lawyer  
 23 already?  
 24 A. I would like to.  
 25 Q. Let me ask the question and if you

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1 G Maxwell - Confidential  
 2 have an issue -- so with respect to this  
 3 flight, do you recall being on a flight in  
 4 the -- [REDACTED] going from Palm Beach to  
 5 Teterboro?  
 6 A. No, I don't recall any specific  
 7 flight.  
 8 Q. Do you recall flying with Virginia  
 9 on a flight with Emmy Taylor and Jeffrey  
 10 Epstein at any time?  
 11 A. I don't.  
 12 Q. How often did you fly on a plane  
 13 with a 17 year old?  
 14 MR. PAGLIUCA: Objection to form  
 15 and foundation.  
 16 A. I have no idea what you are talking  
 17 about, other than friends of mine that had  
 18 kids.  
 19 Q. Did you regularly fly on Jeffrey's  
 20 plane with individuals who were under the age  
 21 of 18?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Can you repeat the question?  
 25 Q. Did you regularly fly on Jeffrey



<p style="text-align: right;">Page 122</p> <p>1 G Maxwell - Confidential</p> <p>2 Epstein's planes with individuals who were</p> <p>3 under the age of 18?</p> <p>4 A. I regularly flew on Jeffrey</p> <p>5 Epstein's airplane but I cannot testify as to</p> <p>6 flying with people under the age. I don't</p> <p>7 believe that I did.</p> <p>8 Q. Why wouldn't you remember flying</p> <p>9 with a 17 year old?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation.</p> <p>12 A. How would I know, one, that she is</p> <p>13 17, how would you know that, how do you know</p> <p>14 I'm on the plane.</p> <p>15 Q. Are you saying you are not on this</p> <p>16 flight, so this is a Palm Beach to Teterboro.</p> <p>17 This says the JE, GM ET and Virginia. The GM</p> <p>18 you are saying is not you?</p> <p>19 MR. PAGLIUCA: I object to the</p> <p>20 form. You can answer the question if</p> <p>21 you know.</p> <p>22 A. How do you know the GM is me.</p> <p>23 Q. Is it your testimony that on the</p> <p>24 flight logs when it represents GM that it is</p> <p>25 not you flying on the plane?</p>	<p style="text-align: right;">Page 124</p> <p>1 G Maxwell - Confidential</p> <p>2 me.</p> <p>3 Q. So as you sit here today, you don't</p> <p>4 believe you flew on that plane?</p> <p>5 A. I'm not saying that. I'm just</p> <p>6 saying you cannot be sure that's me.</p> <p>7 Q. Do you have reason to doubt that</p> <p>8 when it says GM on these flight logs that</p> <p>9 that represents you?</p> <p>10 A. I cannot testify to that. I'm just</p> <p>11 saying it may not be me.</p> <p>12 Q. In looking at the flight logs and</p> <p>13 look up, let's move up a couple of lines. If</p> <p>14 you start at the top, you are going to see</p> <p>15 JE, [REDACTED], then JE, AP, [REDACTED],</p> <p>16 JE, AP [REDACTED] JE, GM, JE, GM, JE, GM,</p> <p>17 Ricardo Loretta, reposition, JE, GM, JE, GM</p> <p>18 ET Kelly Spamm, JE, GM, Kelly Spamm, Tom</p> <p>19 Pritzer, female, Marham Air Force</p> <p>20 repositioning. JE, GM, ET, Kelly Spamm, JE,</p> <p>21 GM, ET, Kelly Spamm, JE, GM, ET, Virginia,</p> <p>22 JE, GM, AP, Virginia, repositioning and then</p> <p>23 a certification.</p> <p>24 So is it your testimony in looking</p> <p>25 at that that you do not believe that the GM</p>
<p style="text-align: right;">Page 123</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to the</p> <p>3 form and foundation.</p> <p>4 A. GM can stand for any level, it</p> <p>5 could be Georgina, George.</p> <p>6 Q. Are there any people that flew with</p> <p>7 Jeffrey Epstein that had the initials GM?</p> <p>8 A. I don't know.</p> <p>9 Q. Do you recall flying with Jeffrey</p> <p>10 Epstein on his plane over 300 times during</p> <p>11 the period of 1999 to 2005?</p> <p>12 A. I cannot testify to how many times</p> <p>13 I was on his plane because that would just be</p> <p>14 impossible.</p> <p>15 Q. You were on his plane regularly,</p> <p>16 would you say?</p> <p>17 A. I already testified I was on his</p> <p>18 plane regularly.</p> <p>19 Q. Is it your testimony and I'm</p> <p>20 referring now to the line that we were just</p> <p>21 talking about that you were not on the flight</p> <p>22 from Palm Beach to Teterboro that lists JE,</p> <p>23 GM, ET and Virginia?</p> <p>24 A. I am not testifying to that. I am</p> <p>25 just saying that you cannot be sure that is</p>	<p style="text-align: right;">Page 125</p> <p>1 G Maxwell - Confidential</p> <p>2 represents you?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. I'm not saying that. I'm just</p> <p>6 saying that you cannot -- I can't sit here</p> <p>7 and tell you for sure GM is me and I cannot</p> <p>8 testify remembering being on a flight at that</p> <p>9 time.</p> <p>10 Q. You don't remember being on any of</p> <p>11 these flights with the initial GM?</p> <p>12 A. I remember being on many flights.</p> <p>13 I cannot testify that is a flight I am on.</p> <p>14 Q. Let's go to the next page which is</p> <p>15 going to be [REDACTED] I want you to look at</p> <p>16 line -- so the date is at the top, so it's</p> <p>17 [REDACTED] and if you go down, you will see</p> <p>18 a line that says the [REDACTED] and if you scroll</p> <p>19 over you will see PBI to TIST, if you look at</p> <p>20 the airport codes, TIST is going to be</p> <p>21 representative for the U.S. Virgin Islands</p> <p>22 and then you will see the list on the plane</p> <p>23 JE, GM, ET and Virginia Roberts.</p> <p>24 Do you recall flying from Palm</p> <p>25 Beach to the U.S. Virgin Islands with</p>



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1 G Maxwell - Confidential  
2 Jeffrey, yourself, Emmy Taylor and Virginia  
3 Roberts?  
4 MR. PAGLIUCA: I object to the form  
5 and just so the record is clear, we  
6 don't agree with whatever your  
7 characterizations are. The document  
8 speaks for itself and she can answer  
9 based on whatever her personal knowledge  
10 is.  
11 MS. McCAWLEY: I understand.  
12 Q. Do you recall flying with those  
13 individuals from Palm Beach to the U.S.  
14 Virgin Islands?  
15 A. I have no recollection of any  
16 individual flight you are pointing out here.  
17 You are talking about 2001, how many years  
18 ago is that?  
19 Q. I'm asking the questions.  
20 A. I'm not being difficult. I'm just  
21 asking, it's like 14, 15 years ago, it's  
22 impossible, I'm sorry.  
23 Q. So your testimony is you don't  
24 recall flying on that flight with Virginia  
25 Roberts?

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1 G Maxwell - Confidential  
2 A. I cannot testify to that flight.  
3 Q. Let's look at the next flight which  
4 is on the [REDACTED] from the Virgin Islands back  
5 to Palm Beach, JE, Jeffrey Epstein, Ghislaine  
6 Maxwell, Emmy Taylor, Virginia Roberts, the  
7 same individuals on the above flight.  
8 A. It doesn't say my name, it has some  
9 initials.  
10 Q. I understand, the initials GM.  
11 Do you recall flying on a plane, on  
12 one of Jeffrey's planes from the Virgin  
13 Islands to Palm Beach with Virginia Roberts?  
14 A. I do not.  
15 Q. Was there any other person that  
16 flew with Jeffrey Epstein with frequency  
17 during that time period in these logs that  
18 have the initials GM?  
19 MR. PAGLIUCA: Objection to the  
20 form and foundation.  
21 A. I would have to look at all the  
22 flight logs, I have no idea, I flew  
23 frequently.  
24 Q. Why don't you take a look at the  
25 next three pages and see if that refreshes

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1 G Maxwell - Confidential  
2 your recollection.  
3 MR. PAGLIUCA: You are talking  
4 about [REDACTED]  
5 MS. McCAWLEY: She can pick any  
6 couple of pages, those have a lot of the  
7 individuals on them so that is a good  
8 sampling.  
9 MR. PAGLIUCA: So pick any pages  
10 you want.  
11 Q. Does that refresh your recollection  
12 at all as to whether GM represents you or  
13 some other individual?  
14 A. Again, I can't testify whether that  
15 represents me or not, I don't see any other  
16 GMs but you have to understand that even if  
17 my name is on that record doesn't mean I was  
18 on the flight.  
19 Q. So are you contesting the accuracy  
20 of the flight logs? In other words, you said  
21 it doesn't represent you are on the flight so  
22 is it your testimony just because a name is  
23 listed doesn't mean they were actually on the  
24 flight?  
25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
2 form and foundation.  
3 A. I can't testify to what -- these  
4 are records that were produced by Dave Rogers  
5 is on here, so these aren't federally  
6 mandated records, so I can't testify to what  
7 he produced.  
8 Q. I would like you to turn to page,  
9 at the bottom, the Bates number is [REDACTED]  
10 And the month is [REDACTED]  
11 A. Okay.  
12 Q. If you go down to the number that  
13 is [REDACTED] that would be [REDACTED], you're  
14 going to see on that line an [REDACTED] which is a  
15 [REDACTED] and then you  
16 will see [REDACTED] which is going to be, I'm going  
17 to pronounce it incorrectly, [REDACTED]  
18 [REDACTED] I'm sure I'm not pronouncing that  
19 correctly. Then you will see in the list,  
20 you will see JE, GM, SK, President Clinton,  
21 Doug Band, it looks like --  
22 A. I believe it says male.  
23 Q. Yes. Then [REDACTED] I  
24 believe. Is that GM on this page  
25 representative of you?

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1 G Maxwell - Confidential  
 2 A. Well, this would be a flight that I  
 3 would potentially remember with Bill Clinton  
 4 on it but I don't actually recall going to  
 5 Russia.  
 6 Q. Are those your initials, do you  
 7 recall being on the flight?  
 8 A. Those are my initials with  
 9 President Clinton, I don't recall this flight  
 10 either, but I would be more likely to if I  
 11 had a bit more time to study the timing of  
 12 this.  
 13 Q. Your testimony is you don't recall  
 14 flying with President Clinton from [REDACTED] to  
 15 [REDACTED]  
 16 A. I don't recall the [REDACTED] to [REDACTED]  
 17 flight. I have definitely flown with  
 18 President Clinton.  
 19 Q. On that same page you will see  
 20 beneath there, beneath 22 you will see the  
 21 indication, same as above, same as above,  
 22 same as above in the column that originally  
 23 had the initials.  
 24 A. Uh-huh.  
 25 Q. And the names.

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1 G Maxwell - Confidential  
 2 A. Uh-huh.  
 3 Q. Do you recall flying with President  
 4 Clinton from [REDACTED] to [REDACTED]  
 5 [REDACTED]  
 6 A. I do.  
 7 Q. So the GM that would be represented  
 8 in that column would be you?  
 9 A. I recall going to [REDACTED] with the  
 10 president so that is likely to be me.  
 11 Q. You were on Jeffrey's plane for  
 12 that trip?  
 13 A. I believe I was.  
 14 Q. Do you know who [REDACTED]  
 15 is?  
 16 A. I do not.  
 17 Q. I'm going back towards the front  
 18 which is going to be [REDACTED] please. And  
 19 you're going to see --  
 20 A. Hang on I'm not --  
 21 Q. Take your time.  
 22 A. Okay.  
 23 Q. You are going to see in the date  
 24 column, you will see [REDACTED] and then about  
 25 halfway down you will see [REDACTED] and

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1 G Maxwell - Confidential  
 2 then you will see the [REDACTED] which  
 3 is the column which is where I want you to  
 4 start looking at the log and there you're  
 5 going to see [REDACTED]  
 11 A. Okay.  
 12 Q. If you look at the column, if you  
 13 go back up to the top on the [REDACTED] if you look  
 14 at the column you will see JE, GM, ET,  
 15 Virginia Roberts and I believe it says [REDACTED]  
 16 [REDACTED] sorry I'm not reading that very  
 17 well.  
 18 Do you recall flying from, if you  
 19 see the dates, the [REDACTED] and  
 20 [REDACTED] Do you recall a trip that went from  
 21 the United States to Canada and to the places  
 22 I just mentioned where Virginia Roberts was  
 23 on the plane with you?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. I already testified that I don't  
 3 recall Virginia on any of these flights.  
 4 Q. I would like to mark, as Maxwell 7,  
 5 I will put it at the top?  
 6 (Maxwell Exhibit 7, photo, marked  
 7 for identification.)  
 8 MR. PAGLIUCA: Has this document  
 9 been produced in discovery?  
 10 MS. McCAWLEY: Yes.  
 11 MR. PAGLIUCA: Do you have a Bates  
 12 number?  
 13 MS. McCAWLEY: This one doesn't.  
 14 Q. I'm going to ask you --  
 15 MR. PAGLIUCA: I don't recall  
 16 seeing this document so I would like to  
 17 see a Bates number document before we  
 18 ask questions about it.  
 19 MS. McCAWLEY: Can you go look for  
 20 it and I will continue. We will set  
 21 that aside until we get a Bates number.  
 22 You may want to leave that log up and  
 23 set it to the side and we will bounce  
 24 back to that.  
 25 Q. Do you recall -- I think earlier

<p style="text-align: right;">Page 134</p> <p>1 G Maxwell - Confidential</p> <p>2 you said you visited Jeffrey's island, I</p> <p>3 think they called it St. Jeffrey or St.</p> <p>4 James, the U.S. Virgin Island home.</p> <p>5 A. St. James.</p> <p>6 Q. Do you recall whether President</p> <p>7 Clinton was ever on that island?</p> <p>8 A. Categorically, definitively,</p> <p>9 absolutely, without a shadow of a doubt, when</p> <p>10 I was present or any other time that I am</p> <p>11 aware of, was President Clinton ever on that</p> <p>12 island, I do not believe he went to that</p> <p>13 island ever ever, that is an absolute</p> <p>14 fabrication and an absolute flat out lie.</p> <p>15 Q. Was President Clinton or former</p> <p>16 President Clinton ever at any of Jeffrey</p> <p>17 Epstein's homes when you present, other than</p> <p>18 the island I know you said that did not</p> <p>19 happen, the home in either New York or Palm</p> <p>20 Beach or New Mexico?</p> <p>21 A. I do not believe at any time</p> <p>22 President Clinton was at any of Jeffrey's</p> <p>23 homes, I have absolutely no knowledge or</p> <p>24 otherwise that he was ever there.</p> <p>25 Q. You don't recall having dinner with</p>	<p style="text-align: right;">Page 136</p> <p>1 G Maxwell - Confidential</p> <p>2 observe Jeffrey and President Clinton</p> <p>3 talking?</p> <p>4 A. I'm sure they did.</p> <p>5 Q. Did they seem friendly?</p> <p>6 A. I don't recollect.</p> <p>7 Q. Was Epstein one of the original</p> <p>8 people that conceived the Clinton global</p> <p>9 initiative?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation.</p> <p>12 Q. Do you know?</p> <p>13 A. I don't have -- I don't know what</p> <p>14 you are talking about.</p> <p>15 Q. You don't know what I'm talking</p> <p>16 about.</p> <p>17 Did you ever, not at one of houses,</p> <p>18 but did you ever eat dinner with President</p> <p>19 Clinton and Jeffrey Epstein?</p> <p>20 A. Are you just talking in general</p> <p>21 anywhere.</p> <p>22 Q. In general?</p> <p>23 A. I believe on a plane of this nature</p> <p>24 we would have had a meal.</p> <p>25 Q. But not outside of the travel on</p>
<p style="text-align: right;">Page 135</p> <p>1 G Maxwell - Confidential</p> <p>2 him at any of those homes?</p> <p>3 A. Again, Virginia is absolutely</p> <p>4 totally lying. This is a subject of</p> <p>5 defamation about Virginia and the lies she</p> <p>6 has told and one of lies she told was that</p> <p>7 President Clinton was on the island where I</p> <p>8 was present. Absolutely 1000 percent that is</p> <p>9 a flat out total fabrication and lie.</p> <p>10 Q. You did fly on planes, Jeffrey</p> <p>11 Epstein's planes with President Clinton, is</p> <p>12 that correct?</p> <p>13 A. I have flown, yes.</p> <p>14 Q. Would it be fair to say that</p> <p>15 President Clinton and Jeffrey are friends?</p> <p>16 A. I wouldn't be able to characterize</p> <p>17 it like that, no.</p> <p>18 Q. Are they acquaintances?</p> <p>19 A. I wouldn't categorize it.</p> <p>20 Q. He just allowed him to use his</p> <p>21 plane?</p> <p>22 A. I couldn't categorize Jeffrey's</p> <p>23 relationship.</p> <p>24 Q. When you were on the plane with</p> <p>25 Jeffrey and President Clinton, did you</p>	<p style="text-align: right;">Page 137</p> <p>1 G Maxwell - Confidential</p> <p>2 the flights?</p> <p>3 A. I can't recollect having a meal</p> <p>4 with them, but just so we are clear, the</p> <p>5 allegations that Clinton had a meal on</p> <p>6 Jeffrey's island is 100 percent false.</p> <p>7 Q. But he may have had a meal on</p> <p>8 Jeffrey's plane?</p> <p>9 A. I'm sure he had a meal on Jeffrey's</p> <p>10 plane.</p> <p>11 Q. You do know how many times he flew</p> <p>12 on Jeffrey's plane?</p> <p>13 A. I don't.</p> <p>14 Q. Do you know who Doug Band is?</p> <p>15 A. I do.</p> <p>16 Q. How do you know him?</p> <p>17 A. He used to work or still works for</p> <p>18 Bill Clinton.</p> <p>19 Q. Did you ever have a relationship</p> <p>20 with him?</p> <p>21 A. We are talking about adult</p> <p>22 consensual relationships, it's off the</p> <p>23 record.</p> <p>24 Q. I'm not asking what you did with</p> <p>25 him, I'm asking if you ever had a</p>

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1 G Maxwell - Confidential  
2 relationship with him?  
3 MR. PAGLIUCA: If you understand  
4 the term relationship, certainly you can  
5 answer that.  
6 A. Define relationship.  
7 Q. Somebody that you would have spent  
8 time together, either seeing them in a  
9 romantic relationship or --  
10 A. You need to be, what do you mean by  
11 romantic. I was friends with Doug but you  
12 are suggesting something more so I want to be  
13 clear what you are actually asking me.  
14 Q. You defined it. You said you were  
15 friends with him. If that's what you were  
16 that's all I need to know.  
17 While you were on the trip with  
18 President Clinton, do you recall where you  
19 stayed at these locations, in other words,  
20 would you leave the jet and stay overnight at  
21 a hotel, do you have a recollection of this  
22 trip?  
23 A. I recollect the trip but if you're  
24 asking me where we stayed, you can see it's a  
25 very fast paced trip. It was very tiring and

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1 G Maxwell - Confidential  
2 I don't recollect where we stayed.  
3 Q. Do you recollect if you stayed at  
4 the same place President Clinton stayed? In  
5 other words, if you left the plane to go a  
6 hotel did you all go together is your  
7 recollection?  
8 A. I honestly don't recollect, no.  
9 Q. Part of this trip we were just  
10 talking about, there is a flight that goes to  
11 Thailand, do you remember being in Thailand?  
12 MR. PAGLIUCA: Objection to the  
13 form and foundation.  
14 A. Are you asking me --  
15 Q. On the President Clinton trip.  
16 A. Are you referencing something?  
17 Q. The part that, let me make sure  
18 I've got it here. The entry that would be  
19 the Thailand, would be the one -- let me make  
20 sure I'm correct. I have you on the wrong  
21 page, it's actually the page before. It's  
22 going to be [REDACTED] And it's going to be the  
23 entry on [REDACTED] starting on [REDACTED] and then  
24 it goes down to where it has the same as  
25 above, to [REDACTED] -- I'm saying

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1 G Maxwell - Confidential  
2 [REDACTED]  
3 MR. PAGLIUCA: That's what the  
4 document says.  
5 Q. I'm not representing the date but  
6 there it is. So the last leg of that where  
7 it says same as above has, the second to  
8 last, I'm sorry on the 2 [REDACTED]  
9 [REDACTED]  
10 Do you remember being in Thailand  
11 with President Clinton?  
12 A. I do.  
13 Q. Do you remember what the purpose of  
14 that trip was?  
15 A. I don't.  
16 Q. Do you know whether -- do you  
17 recall, did you stay the night in Thailand?  
18 A. I don't recall.  
19 Q. Do you recall why you went to  
20 Thailand?  
21 A. I don't recall.  
22 Q. Who is Andrea Mitrovich?  
23 A. She I believe was a stewardess on  
24 this flight.  
25 Q. Did she perform any massages on the

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1 G Maxwell - Confidential  
2 flight?  
3 A. I don't recollect any massages on  
4 the flight.  
5 Q. Do you know who [REDACTED] is?  
6 A. It doesn't -- no I don't know who  
7 that is, I can't recall.  
8 Q. This is not in color, it's a black  
9 and white but it has the Bates label on it.  
10 Should I take the sticker off the one that  
11 has -- I don't know if you want to swap it.  
12 MR. PAGLIUCA: Let the record  
13 reflect I am replacing this on the black  
14 and white copy of this exhibit with  
15 [REDACTED]  
16 Q. So, we were talking earlier, we  
17 were looking at the flight logs and we were  
18 talking about a trip and let me just get you  
19 back to the page. [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]



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1 G Maxwell - Confidential  
2 Q. Can I direct your attention to the  
3 picture, please.  
4 A. Of course.  
5 Q. Can you tell me who is in this  
6 picture, who is pictured here, and for the  
7 court reporter's benefit, can you go from the  
8 left of the picture to the right of the  
9 picture, to the extent you can identify the  
10 individuals?  
11 A. Sure. I cannot identify the person  
12 on the left, I cannot identify the person  
13 next left. I can identify Jeffrey Epstein.  
14 I cannot identify the next person to his  
15 right and the next person in the picture is  
16 myself.  
17 Q. Is the individual all the way to  
18 the left at the beginning of the picture,  
19 does that resemble Emmy Taylor. You might  
20 want to look at the color version if that  
21 helps you at all, I know it's not the marked  
22 one. I don't if that's easier to see, they  
23 are both dark.  
24 A. That does not look like Emmy Taylor  
25 at all.

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1 G Maxwell - Confidential  
2 Q. Do you recall --  
3 MR. PAGLIUCA: Let's mark this then  
4 as deposition Exhibit 8 since we are  
5 referring to it and then you can give us  
6 copies as well.  
7 MS. MENNINGER: It's different  
8 because it has other people in this  
9 color photo.  
10 (Maxwell Exhibit 8, photo, marked  
11 for identification.)  
12 Q. Do you recall who took this  
13 photograph?  
14 A. I do not.  
15 Q. Do you recall this photograph being  
16 taken by Virginia?  
17 A. First of all, I don't know where we  
18 are.  
19 Q. So you don't recognize the  
20 building?  
21 A. I don't recognize the building and  
22 I don't recognize -- the only two people I  
23 recognize in the picture are Jeffrey and  
24 myself.  
25 Q. Does this like look a picture of a

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1 G Maxwell - Confidential  
2 building that you would have seen when you  
3 were on the trip in Europe?  
4 MR. PAGLIUCA: Objection to the  
5 form and foundation.  
6 A. I can't possibly answer that.  
7 Q. Do you recall Virginia ever taking  
8 pictures?  
9 A. I barely recall Virginia, period.  
10 Q. Do you recall her ever taking  
11 pictures?  
12 A. No, I don't.  
13 Q. I'm going to direct your attention,  
14 still within the flight logs to -- starting  
15 on the next page from where you just were  
16 which is going to be [REDACTED] And the date at  
17 the top says [REDACTED] you will see [REDACTED] and I'm  
18 directing your attention down towards the  
19 middle to the bottom where you will see the  
20 numbers [REDACTED]  
21 A. Uh-huh.  
22 Q. And we've got actually I'm going to  
23 direct your attention to the one that starts  
24 [REDACTED]  
25 [REDACTED]

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1 G Maxwell - Confidential  
2 and in the line, the remarks line you will  
3 see JE, GM, AP, VR, BK, Marvin Minski and  
4 [REDACTED]  
5 MR. PAGLIUCA: Are you reading the  
6 29th, is that what you're reading?  
7 MS. McCAWLEY: I'm reading the  
8 29th, yes.  
9 Q. Below that you will see JE, GM, AP,  
10 VR, [REDACTED] and Marvin  
11 Minski.  
12 Do you see that?  
13 A. I do.  
14 Q. Do you recall a trip from Teterboro  
15 to Santa Fe and Santa Fe back to Palm Beach  
16 with these individuals?  
17 A. I don't.  
18 Q. Do you recall being on a plane with  
19 [REDACTED] and Virginia Roberts?  
20 A. I don't.  
21 Q. Do you recall ever witnessing any  
22 sexual interaction on one of Jeffrey's planes  
23 with any of these individuals?  
24 A. I do not, absolutely not.  
25 Q. Did Jeffrey have a fold out bed on



<p style="text-align: right;">Page 146</p> <p>1 G Maxwell - Confidential</p> <p>2 one of his planes?</p> <p>3 A. There was a bed on one of his</p> <p>4 planes that folded out, yes.</p> <p>5 Q. Do you recall whether with respect</p> <p>6 to this being in Santa Fe, do you recall</p> <p>7 whether you were there for some form of a</p> <p>8 party?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 A. I don't recall the trip at all and</p> <p>12 this looks like a total work trip, not a</p> <p>13 party trip.</p> <p>14 Q. What would be the difference</p> <p>15 between a work trip and a party trip?</p> <p>16 A. Just that I would be on trips for</p> <p>17 work and I believe that this looks like, AP</p> <p>18 looks like it's one of the -- probably one of</p> <p>19 the designers and the time would meet with a</p> <p>20 trip to decorate the house, just the timing</p> <p>21 of it.</p> <p>22 Q. So would Virginia be brought on</p> <p>23 trips that were for the purpose of work and</p> <p>24 decorating the house?</p> <p>25 A. Like I said, I never worked with</p>	<p style="text-align: right;">Page 148</p> <p>1 G Maxwell - Confidential</p> <p>2 excerpts from -- we will identify what they</p> <p>3 are but from the message pads.</p> <p>4 Did you want to correct anything?</p> <p>5 A. I want to make an addendum.</p> <p>6 Would you mind rereading the last</p> <p>7 question back to me?</p> <p>8 (Record read.)</p> <p>9 A. I also just want to say that at</p> <p>10 this point I cannot recollect flying to</p> <p>11 parties. Jeffrey went for work so -- was</p> <p>12 this in Santa Fe, this flight as well.</p> <p>13 Q. The flight we were looking at, yes</p> <p>14 but it was to Santa Fe --</p> <p>15 A. I don't recall going to any parties</p> <p>16 in Santa Fe at any time but certainly flying</p> <p>17 to Santa Fe for a party seems highly</p> <p>18 improbable.</p> <p>19 Q. So I'm going to direct your</p> <p>20 attention to the document that I set before</p> <p>21 you which is Bates number [REDACTED] and it</p> <p>22 has different Bates numbers because it's a</p> <p>23 smaller version of the larger production.</p> <p>24 These are the pages I will be asking about.</p> <p>25 In the time that you were working</p>
<p style="text-align: right;">Page 147</p> <p>1 G Maxwell - Confidential</p> <p>2 her but you would have to ask Jeffrey what he</p> <p>3 brought her on the trip for.</p> <p>4 Q. But she would travel with him when</p> <p>5 there was a work trip like this?</p> <p>6 A. I can't -- I'm seeing that she is</p> <p>7 on this flight but I have no idea what she is</p> <p>8 doing, he invited her, it would not be my</p> <p>9 job.</p> <p>10 Q. What about [REDACTED] would she</p> <p>11 regularly travel with Jeffrey on flights?</p> <p>12 A. I have no idea, you would have to</p> <p>13 look through the flight logs. I have no</p> <p>14 idea.</p> <p>15 Q. Your recollection is -- what is</p> <p>16 your recollection, do you recollect [REDACTED]</p> <p>17 traveling often on flights with Jeffrey?</p> <p>18 A. Absolutely not. No, not at all. I</p> <p>19 don't recollect her actually on the flight at</p> <p>20 all.</p> <p>21 Q. I think you can set that aside for</p> <p>22 the moment.</p> <p>23 (Maxwell Exhibit 9, message pad</p> <p>24 pages, marked for identification.)</p> <p>25 Q. We will mark as Exhibit 9 these</p>	<p style="text-align: right;">Page 149</p> <p>1 G Maxwell - Confidential</p> <p>2 with Jeffrey in Palm Beach, do you recall a</p> <p>3 process for taking, anybody at the house</p> <p>4 taking messages when incoming phone calls</p> <p>5 came in?</p> <p>6 A. You are supposed to take a message</p> <p>7 and receive the message and write the message</p> <p>8 down. Who was the message was for, what time</p> <p>9 it was taken and who took it and what the</p> <p>10 message was, obviously.</p> <p>11 Q. Does what's in front of you look</p> <p>12 familiar with respect to the message pads</p> <p>13 that you would have used at the house?</p> <p>14 A. It is familiar.</p> <p>15 Q. I'm going to direct your attention</p> <p>16 to the second page of it?</p> <p>17 MR. PAGLIUCA: These all have SAO</p> <p>18 numbers on them or Bates ranges and I</p> <p>19 don't see any of your Bates ranges on</p> <p>20 these. I know you have produced message</p> <p>21 pads but those have your Bates range</p> <p>22 numbers on them and I'm wondering if</p> <p>23 these are different documents.</p> <p>24 MS. McCAWLEY: It's the same, just</p> <p>25 ours have the Bates underneath them.</p>

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1 G Maxwell - Confidential  
 2 These were produced as part of the rule  
 3 26 discovery. We can get the additional  
 4 Bates if you want.

5 Q. The one I'm asking about first is  
 6 the [REDACTED] You can look at that and then  
 7 I will identify the Bates number referenced  
 8 in this case.

9 I want to direct your attention to  
 10 the top right-hand corner just so I have an  
 11 understanding of how these messages were  
 12 taken. So I see that it says at the top it  
 13 says in the for line it says Ms. Maxwell and  
 14 the date of 4/25/04 and then I see under the  
 15 M line it looks like Necole Hesse or  
 16 something like that, a phone number and a  
 17 message saying returning your call and on the  
 18 bottom it looks like [REDACTED]

19 Explain to me, is this -- does this  
 20 represent Rushi taking down a message for you  
 21 from Ms. Hesse, is that how these work?

22 MR. PAGLIUCA: Objection to the  
 23 form and foundation. Go ahead.

24 Q. My question is, I'm trying to  
 25 understand how the messages were taken.

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1 G Maxwell - Confidential  
 2 Looking at this message pad, where it says  
 3 signed [REDACTED] can you tell me who [REDACTED] was?

4 A. I cannot.

5 Q. You do not know.

6 Typically when these messages were  
 7 taken in your practice when you were there,  
 8 would the individual who took the message  
 9 write their name on the message?

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

12 A. I don't recollect, you can ask who  
 13 wrote it so you can find out who it was.

14 Q. Do you know who Necole Hesse is?

15 A. I don't.

16 Q. I'm going to direct your  
 17 attention -- do we have a Bates number for  
 18 that?

19 MR. EDWARDS: [REDACTED]

20 Q. Giuffre [REDACTED] for that one.

21 I will direct your attention to the  
 22 first page which has the [REDACTED] on it.

23 A. Okay.

24 Q. Now at the top of that document, on  
 25 the right-hand side, the message that reads

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1 G Maxwell - Confidential  
 2 for JE, date 1/02/03, message Caroline Casey  
 3 and then it's signed GM.

4 Is that your signature?

5 A. That's not my handwriting.

6 Q. Would other people take a message,  
 7 how did this process work, is there someone  
 8 else in the house with the initials GM?

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

11 A. I cannot answer that. It's not my  
 12 handwriting.

13 Q. I'm trying to understand how this  
 14 gets there. If you took a message and didn't  
 15 write it down, would someone else record that  
 16 message for you?

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

19 A. All I can tell you, this is not my  
 20 handwriting so I cannot -- I have no idea  
 21 what that is.

22 Q. Was the practice that, what was the  
 23 practice when someone answered the phone with  
 24 these message pads, what were they supposed  
 25 to do?

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1 G Maxwell - Confidential

2 A. They were supposed to take a  
 3 message and the time and date and give the  
 4 message.

5 Q. Were they supposed to indicate who  
 6 took the message?

7 A. They were but it wasn't -- I don't  
 8 really recall the actual process. I can see  
 9 from here it looks like you were supposed to  
 10 but that's not my handwriting so I can't say  
 11 what that was.

12 Q. Do you know who Caroline Casey is?

13 A. No, I don't.

14 Q. Do you know whether Caroline Casey  
 15 was under the age of 18?

16 A. I just testified I couldn't  
 17 remember who she was so it would be difficult  
 18 to know how old she was.

19 Q. Do you know if she was coming to  
 20 the house to provide massages?

21 A. I don't remember who she is at all,  
 22 so no.

23 Q. And then I would like to direct  
 24 your attention to the message right

25 underneath it. Which says JE, [REDACTED] Amanda

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1 G Maxwell - Confidential  
 2 and has a phone number and the message says,  
 3 wants to know if she should bring her friend  
 4 [REDACTED] tonight.  
 5 What is that message referring to?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I can't possibly know.  
 9 Q. Did individuals at the house take  
 10 messages for underage girls to come over and  
 11 bring friends for the purpose of providing  
 12 massages?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. How would I possibly know what you  
 16 are talking about.  
 17 Q. Did you record messages at the  
 18 house?  
 19 A. It's not my job.  
 20 Q. You did from time to time record  
 21 messages?  
 22 A. Hardly ever.  
 23 Q. But you did from time to time do  
 24 it?  
 25 A. I'm just saying I hardly ever took

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1 G Maxwell - Confidential  
 2 messages, very, very, very, very  
 3 infrequently.  
 4 Q. Do you know if Amanda brought her  
 5 friend [REDACTED] over on that night?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. One, I don't know what this message  
 9 is, I don't know if I was in Palm Beach, I  
 10 don't know who Amanda is, I don't know who  
 11 [REDACTED] is and I don't know what this message  
 12 is referring to.  
 13 Q. So on January 2nd of 2003, were you  
 14 in Palm Beach?  
 15 A. I don't know.  
 16 Q. Where would you have been other  
 17 than Palm Beach at the time?  
 18 A. I could have been anywhere.  
 19 Q. Where did you typically live?  
 20 A. What are you asking me?  
 21 Q. So for example, in 2003, where was  
 22 your primary residence, was it wherever  
 23 Jeffrey was living and staying or was it  
 24 independent of that?  
 25 A. What was the date again.

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1 G Maxwell - Confidential  
 2 Q. In 2003?  
 3 A. The end of 2003?  
 4 Q. January, the beginning.  
 5 A. I don't know, I could have been  
 6 anywhere, Jeffrey and I were leading almost  
 7 separate lives by then.  
 8 Q. If you were at the house that day,  
 9 did you recall seeing anybody by the name of  
 10 [REDACTED]  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I don't know if I was at the house,  
 14 so I can't testify to that.  
 15 Q. Let's flip back to the next page,  
 16 the one we were on before the [REDACTED] the  
 17 message towards the bottom that says, for  
 18 Jeffrey, message of Ghislaine. And it says,  
 19 Would it be helpful to have and then redacted  
 20 come to Palm Beach today to stay here and  
 21 help train new staff with Ghislaine. Who  
 22 were you referring to in that message; do you  
 23 remember?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 Q. The question is, do you recall this  
 3 message?  
 4 A. I do not recall this message.  
 5 Q. Do you recall training a female  
 6 under the age of 18 at Jeffrey's home?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I never trained a female under the  
 10 age of 18 at Jeffrey's home.  
 11 Q. Did you ever say it would be  
 12 helpful to have a female under the age of 18  
 13 come to Palm Beach today to stay here and  
 14 help train new staff with Ghislaine?  
 15 A. I never asked anyone under the age  
 16 of 18 come to help train new staff.  
 17 Q. I'm going to flip to the next page  
 18 which is [REDACTED].  
 19 A. By the way, that is not my  
 20 handwriting and it's not dated and I couldn't  
 21 possibly tell you who that is.  
 22 Did you hear that?  
 23 Q. You got your testimony on the  
 24 record.  
 25 2832.

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1 G Maxwell - Confidential  
 2 A. Yes.  
 3 MR. EDWARDS: Giuffre [REDACTED]  
 4 Q. I'm going to direct your attention  
 5 to the top right-hand corner, for Mr.  
 6 Epstein, [REDACTED] message [REDACTED] a phone  
 7 number and called.  
 8 Do you know who [REDACTED] is?  
 9 A. I don't.  
 10 Q. Do you know that [REDACTED] was 15 at  
 11 the time she left this message?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I don't know who [REDACTED] is.  
 15 Q. And then I'm going to direct your  
 16 attention to the bottom left which is a  
 17 message JE message of Jean Luc and the  
 18 message says, He just did a good one, 18  
 19 years, she spoke to me and said I love  
 20 Jeffrey.  
 21 Was Jean Luc referring to sex with  
 22 an 18 year old in that message?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. How could I know what Jean Luc is

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1 G Maxwell - Confidential  
 2 referring to.  
 3 Q. Do you know if Jean Luc had sex  
 4 with an 18 year old that he referenced to  
 5 Jeffrey Epstein?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. How could I possibly know.  
 9 Q. Did Jeffrey Epstein or Jean Luc  
 10 ever tell you that Jean Luc had sex with an  
 11 18 year old?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. I have no idea what you are talking  
 15 about.  
 16 Q. Did they ever tell you that?  
 17 A. I have no recollection of ever  
 18 hearing such a ridiculous thing.  
 19 Q. I will turn to the next page which  
 20 is SAO 2841?  
 21 MS. MENNINGER: Do you have the  
 22 Bates number?  
 23 Q. The bottom right-hand corner, Mr.  
 24 Epstein, the date [REDACTED] Ms. Maxwell, it  
 25 says, [REDACTED] it says, quote, [REDACTED] is

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1 G Maxwell - Confidential  
 2 available on Tuesday, no one for tomorrow.  
 3 Is this a message you took?  
 4 A. It's not my handwriting and I don't  
 5 know who R is.  
 6 Q. So when it says Ms. Maxwell in the  
 7 line there, is that you calling for Mr.  
 8 Epstein?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I didn't write it, I don't know  
 12 when this message was taken. I don't even  
 13 know what it's referring to and I don't know  
 14 what my name is doing on that message pad.  
 15 Q. I know you said you only took them  
 16 a few times. Do you have a recollection of  
 17 taking messages of females who would call the  
 18 house to indicate whether or not they were  
 19 coming over?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Give me a date range.  
 23 Q. On 7/9/04.  
 24 A. How would I know if I'm in Palm  
 25 Beach, most likely not.

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1 G Maxwell - Confidential  
 2 Q. I'm asking if you have a  
 3 recollection of taking messages for girls who  
 4 would call the house --  
 5 A. Girls.  
 6 Q. Females, who would call the  
 7 house --  
 8 A. Over the age of 18.  
 9 Q. [REDACTED] is 15.  
 10 A. I don't know who [REDACTED] is, so I  
 11 can't testify anything to [REDACTED]  
 12 Q. Your name is on the message.  
 13 A. I didn't put it there and I don't  
 14 know what it's doing there.  
 15 Q. So your testimony is you didn't  
 16 take this message?  
 17 A. I obviously didn't take the  
 18 message, it's signed by somebody R, it's not  
 19 my handwriting. We don't know if I'm in Palm  
 20 Beach.  
 21 Q. Did you arrange for [REDACTED] to have  
 22 his friend [REDACTED] come over on Tuesday of  
 23 this week?  
 24 A. I don't know who [REDACTED] is so it  
 25 would be hard for me to arrange anything with



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1 G Maxwell - Confidential  
 2 someone I don't know.  
 3 Q. Why is your name reflected on this  
 4 message pad?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I have no idea. You would have to  
 8 ask whoever took the message.  
 9 Q. Did you, in the course of your  
 10 work, regularly take messages for Jeffrey  
 11 Epstein?  
 12 A. I already testified I hardly ever  
 13 did.  
 14 Q. Would you, in the course of your  
 15 work, regularly set up appointments for  
 16 females to come over and give massages for  
 17 Jeffrey Epstein?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. Can you specify, females, you mean  
 21 adults over the age of 18.  
 22 Q. Did you regularly set up for  
 23 Jeffery adults over the age of 18 to come for  
 24 massages?  
 25 A. I didn't regularly do that, no.

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1 G Maxwell - Confidential  
 2 Q. Would you take messages with  
 3 respect to females over the age of 18 to come  
 4 over for a massage?  
 5 A. I already testified I hardly ever  
 6 did take messages.  
 7 Q. But would you?  
 8 A. I already testified, I hardly  
 9 ever --  
 10 Q. I know hardly ever, but did you?  
 11 A. Over the course of time it is  
 12 possible I may have taken a couple, I have no  
 13 recollection. I hardly ever did and I did so  
 14 irregularly that it would hard for me to  
 15 pinpoint.  
 16 Q. Did you ever take a message for a  
 17 female under the age of 18 to come over for a  
 18 massage or for any other reason to be with  
 19 Jeffrey Epstein?  
 20 MR. PAGLIUCA: Object to the form  
 21 and foundation.  
 22 A. I hardly ever took a message. I  
 23 have absolutely no way of knowing, maybe one  
 24 of my friends' daughters called to say they  
 25 were coming to visit me. I have never taken

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1 G Maxwell - Confidential  
 2 messages, I don't know about how I would  
 3 possibly know if somebody I spoke to, one or  
 4 two times I took a message is, how old they  
 5 would be but I have never taken a message  
 6 where I was aware of anything being under the  
 7 age of 18 and I probably took it so  
 8 infrequently, it would be impossible.  
 9 Q. Can you turn to [REDACTED] it  
 10 should be the next page.  
 11 A. Uh-huh.  
 12 Q. Do you see at the top, it says, for  
 13 Mr. J. 11/8/04 and then the name is  
 14 redacted. It says, I have a female for him.  
 15 Why would a minor be calling  
 16 Jeffrey to say they have a female for him?  
 17 Do you know?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. First of all, I don't know that's a  
 21 minor, I don't know who took the message.  
 22 Q. I will represent to you these are  
 23 police reports and minor's names have to be  
 24 redacted for privacy purposes?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 Q. Do you know why a minor child would  
 4 be calling Jeffrey and leaving a message to  
 5 say, quote, I have a female for him?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I can't testify anything about this  
 9 message, I don't know anything about it.  
 10 Q. I'm going to direct your attention  
 11 to the next page [REDACTED] If you look at  
 12 the bottom left, you are going to see a  
 13 message for Jeffrey, from [REDACTED] it  
 14 says she doesn't have a number and left a  
 15 message that she called.  
 16 Do you know who [REDACTED] is?  
 17 A. I do not.  
 18 Q. Do you know that [REDACTED] was  
 19 13 at the time she placed this call to  
 20 Jeffrey?  
 21 A. I don't know who [REDACTED] is.  
 22 Q. Would Jeffrey regularly have 13  
 23 year olds call and leave messages?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. How would I possibly, these were  
 3 messages taken when I was not at the house  
 4 and I have no idea who they are nor how old  
 5 they are nor anything.  
 6 Q. How do you know you weren't at the  
 7 house on this day?  
 8 A. I was hardly at the house in 2005.  
 9 Q. So you could have been there, you  
 10 just don't know?  
 11 A. In the five days I might have been  
 12 there in 2005, I suppose it's possible but  
 13 it's unlikely.  
 14 MR. PAGLIUCA: Do you know why this  
 15 isn't redacted if you are representing  
 16 all the names of people who are underage  
 17 have been redacted from these records.  
 18 MS. McCAWLEY: I think it was -- my  
 19 assumption is it was a miss by the  
 20 police department.  
 21 Q. I will direct your attention to [REDACTED]  
 22 [REDACTED] so you will skip a page and go back,  
 23 it's the final page in the message pads and  
 24 you will see on the top left for Jeffrey, on  
 25 6/1/2005 from Jean Luc Brunel with a phone

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1 G Maxwell - Confidential  
 2 number. It says, quote, He has a teacher for  
 3 you to teach you how to speak Russian. She  
 4 is two times eight years old. Not blond.  
 5 Lessons are free and you can have your first  
 6 today if you call.  
 7 Do you know whether Jean Luc Brunel  
 8 sent a Russian girl that was 16 years old  
 9 over to Jeffrey Epstein's home?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. I do not know.  
 13 Q. Did you ever observe a Russian girl  
 14 that was 16 years old come to Jeffrey  
 15 Epstein's home?  
 16 A. I am not aware of any 16 year old  
 17 Russian girl that I can recall in Jeffrey  
 18 Epstein's home.  
 19 Q. Do you know whether Jeffrey Epstein  
 20 had sex with a 16 year old Russian girl?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I do not know.  
 24 THE VIDEOGRAPHER: It's 12:25.  
 25 This will be the end of disk 3, we are

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1 G Maxwell - Confidential  
 2 off the record.  
 3 (Recess.)  
 4 AFTERNOON SESSION  
 5 (Time noted: 1:21 p.m.)  
 6 GHISLAINE MAXWELL,  
 7 resumed and testified as follows:  
 8 EXAMINATION BY (Cont'd.)  
 9 MS. McCAWLEY:  
 10 THE VIDEOGRAPHER: It's now 1:21,  
 11 we're starting disk No. 4. We are back  
 12 on the record.  
 13 Q. Ms. Maxwell, before the break, we  
 14 were talking about and I think it's one of  
 15 the exhibits that's marked in front of you,  
 16 I'm not sure of the number, but the police  
 17 report that I showed you earlier today.  
 18 Now that you have knowledge of the  
 19 police report and the criminal investigation  
 20 with respect to Jeffrey Epstein, do you  
 21 believe that Jeffrey Epstein abused any minor  
 22 children?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Can you repeat the question please

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1 G Maxwell - Confidential  
 2 and break it down so it's more  
 3 understandable.  
 4 Q. Now that you have the police report  
 5 that I showed you this morning that you had  
 6 an opportunity to look at.  
 7 A. You gave it to me, I did not look  
 8 at it.  
 9 Q. The questions that I asked you  
 10 about the police report -- you are aware  
 11 there is a police report?  
 12 A. I am aware there is a police  
 13 report.  
 14 Q. You are aware there was a criminal  
 15 investigation of Jeffrey Epstein?  
 16 A. I am aware that there was that.  
 17 Q. Now that you are aware of those two  
 18 things and having talked to Jeffrey Epstein,  
 19 do you believe Jeffrey Epstein sexually  
 20 abused minors?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. Can you reask the second part of  
 24 that question please.  
 25 Q. Sure. The two documents we were

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1 G Maxwell - Confidential  
 2 talking about, the document and the  
 3 investigation, you said you are aware of and  
 4 after having talked to Jeffrey Epstein, do  
 5 you believe Jeffrey Epstein sexually abused  
 6 minors?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. What do you mean I talked to  
 10 Jeffrey, you need to break the question down  
 11 further.  
 12 Q. So you have the police report.  
 13 A. I do.  
 14 Q. And you are aware of the criminal  
 15 investigation?  
 16 A. I am.  
 17 Q. Let's take those two things. After  
 18 knowing those two things, do you believe that  
 19 Jeffrey Epstein abused minor children?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Can you explain what you mean by  
 23 the question actually.  
 24 Q. I think the question speaks for  
 25 itself. I will try again. I will say it one

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1 G Maxwell - Confidential  
 2 more time because I want you to be able to  
 3 understand it.  
 4 Knowing that you have the police  
 5 report here and knowing about the criminal  
 6 investigation, do you believe that Jeffrey  
 7 Epstein sexually abused minors?  
 8 MR. PAGLIUCA: Same objection.  
 9 A. I know what you put in front of me  
 10 and I know what I read.  
 11 Q. I'm asking what you believe, do you  
 12 believe Jeffrey Epstein sexually abused  
 13 minors?  
 14 A. I can only tell you what I read and  
 15 what you showed me.  
 16 Q. I'm asking what you believe, from  
 17 your own belief, do you believe that Jeffrey  
 18 Epstein abused minors?  
 19 A. I can only go from what I know  
 20 personally and what I know personally about  
 21 what Virginia's lies talked about. She is  
 22 the only person I know that actually claimed  
 23 that. And I can say with certitude that  
 24 everything Virginia said was a lie.  
 25 Q. You are aware Jeffrey Epstein was

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1 G Maxwell - Confidential  
 2 sentenced for sexual abuse, are you aware of  
 3 that?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 Q. Are you aware that Jeffrey Epstein  
 7 served time for sexual abuse of a minor?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I don't believe that's what he was  
 11 sentenced for, actually.  
 12 Q. So you don't know that Jeffrey  
 13 Epstein served time for sexually abusing a  
 14 minor?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I don't believe that's what he was  
 18 sentenced for.  
 19 Q. Do you know that Jeffrey Epstein  
 20 was convicted for procuring a minor for  
 21 prostitution?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. I don't know exactly what he was  
 25 convicted of. I don't know that he was

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1 G Maxwell - Confidential  
 2 convicted. I know he spent time in jail.  
 3 Q. Do you know that he spent time in  
 4 jail related to an issue with a minor child?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I did not know that.  
 8 Q. What did you think he was spending  
 9 time in jail for?  
 10 A. I only know he went to jail for --  
 11 it was alleged that he hired -- had an  
 12 underage prostitute.  
 13 Q. So knowing that, do you believe  
 14 that Jeffrey Epstein sexually abused minors?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I can only tell you what he went to  
 18 jail for.  
 19 Q. I'm asking what you believe. I'm  
 20 not asking what he went to jail for. I'm  
 21 asking for your belief.  
 22 A. I cannot testify to what I believe.  
 23 I can only say what I have seen in the  
 24 reports and I know he went to jail.  
 25 Q. You can testify to what you

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1 G Maxwell - Confidential  
 2 believe. Do you believe --  
 3 A. I can only testify --  
 4 Q. Let me finish the question so the  
 5 record is clear.  
 6 Do you believe Jeffrey Epstein  
 7 sexually abused minors?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 Q. You can answer.  
 11 A. I can only testify to what I know.  
 12 I know that Virginia is a liar and I know  
 13 what she testified is a lie. So I can only  
 14 testify to what I know to be a falsehood and  
 15 half those falsehoods are enormous and so I  
 16 can only categorically deny everything she  
 17 has said and that is the only thing I can  
 18 talk about because I have no knowledge of  
 19 anything else.  
 20 Q. I'm not asking about Virginia. I'm  
 21 asking whether you believe that Jeffrey  
 22 Epstein sexually abused minors?  
 23 A. Again, I repeat, I can only go on  
 24 what I know and what I know is a falsehood  
 25 based on what Virginia said.

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1 G Maxwell - Confidential  
 2 Q. Do you believe Jeffrey Epstein  
 3 sexually abused minors?  
 4 A. Again, I repeat, Virginia is a liar  
 5 and based on Virginia's stories, that is  
 6 what -- she lied and I can only then talk  
 7 about what you've showed me in the police  
 8 reports and I know he went to jail.  
 9 Q. Do you believe that Jeffrey Epstein  
 10 sexually abused minors? I'm asking about  
 11 your belief.  
 12 A. Again, I just repeat, I can only  
 13 go -- my belief is Virginia is a liar.  
 14 Q. What is that belief?  
 15 A. She is an absolute liar and  
 16 everything she said is a lie and therefore,  
 17 everything that stems from that is a lie.  
 18 Q. So do you believe that Jeffrey  
 19 Epstein sexually abused minors?  
 20 A. Again -- can we move on from here?  
 21 Q. No. You are going to answer the  
 22 question.  
 23 A. I have already.  
 24 Q. No, you haven't.  
 25 A. I have.

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1 G Maxwell - Confidential  
 2 Q. Do you believe Jeffrey Epstein  
 3 sexually abused minors?  
 4 A. Again, I repeat, the only person I  
 5 know who has talked about these things that I  
 6 have personal -- was personally present, was  
 7 Virginia and I can only talk to Virginia and  
 8 she is a liar.  
 9 Q. Setting aside Virginia. Take her  
 10 out of the picture. It's my question.  
 11 A. We are here today because of  
 12 Virginia and her lies because this is a  
 13 defamation suit.  
 14 Q. Setting aside Virginia, do you  
 15 believe Jeffrey Epstein sexually abused  
 16 minors?  
 17 A. I cannot set aside Virginia because  
 18 that's why we are here and this is the only  
 19 reason I am sitting here in this room and I  
 20 will not set her aside and I cannot comment  
 21 about anything else except her because she is  
 22 the only person I actually know about.  
 23 Q. Are you refusing to answer that  
 24 question?  
 25 A. I am not refusing the question. I

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1 G Maxwell - Confidential  
 2 can only testify about Virginia who is an  
 3 absolute total liar and you all know she is.  
 4 She lied about her age, you know she lied  
 5 about absolutely everything. So I can only  
 6 go on what I know as a liar and she is a  
 7 liar, an exaggerator, a fantasist and  
 8 absolutely true terrible person.  
 9 Q. I want you to listen very  
 10 carefully. I am asking you to set aside  
 11 Virginia.  
 12 A. I can't set aside Virginia.  
 13 Q. I am asking you to do that for  
 14 purposes of this question.  
 15 MR. PAGLIUCA: She doesn't have to.  
 16 MS. McCAWLEY: She can refuse to  
 17 answer the question.  
 18 A. I'm not refusing to answer the  
 19 question.  
 20 Q. You are refusing.  
 21 My question has nothing to do with  
 22 Virginia. Let me make the record here. My  
 23 question has nothing to do with Virginia. I  
 24 want it to be clear for the court. My  
 25 question has nothing to do with Virginia.



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<p>1 G Maxwell - Confidential</p> <p>2 What I'm asking you is whether you</p> <p>3 believe Jeffrey Epstein abused minors?</p> <p>4 MR. PAGLIUCA: I object to the form</p> <p>5 and you made your record, she answered</p> <p>6 the question. A fair reading of her</p> <p>7 answer is she doesn't have a belief</p> <p>8 because she doesn't have any personal</p> <p>9 knowledge.</p> <p>10 MS. McCAWLEY: Now you are</p> <p>11 testifying for the witness. Let her</p> <p>12 answer the question.</p> <p>13 MR. PAGLIUCA: It's a fair answer</p> <p>14 to the question.</p> <p>15 A. Again, I testified my only personal</p> <p>16 knowledge concerns Virginia and everything</p> <p>17 Virginia has said is an absolute lie, which</p> <p>18 is why we are here in this room. If you are</p> <p>19 asking me to testify about things I have no</p> <p>20 knowledge of other than the police report</p> <p>21 that you showed me, I am not in a position to</p> <p>22 make a statement based on that because you</p> <p>23 are asking me to speculate and I cannot</p> <p>24 speculate.</p> <p>25 Q. I'm asking you about your belief.</p>	<p>1 G Maxwell - Confidential</p> <p>2 said is a lie. Therefore, based on those</p> <p>3 lies I cannot speculate on what anybody else</p> <p>4 did or didn't do because if Virginia is the</p> <p>5 example of what that story is and everything</p> <p>6 she said is false, so everything that leads</p> <p>7 from that is false.</p> <p>8 Q. So the 30 other minor children in</p> <p>9 the police report are also telling lies about</p> <p>10 being sexually abused during massages with</p> <p>11 Mr. Epstein?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation. Counsel, can you</p> <p>14 show me in these police reports who the</p> <p>15 30 minors are?</p> <p>16 MS. McCAWLEY: I'm asking my</p> <p>17 question.</p> <p>18 MR. PAGLIUCA: You are making a</p> <p>19 representation about numbers, you are</p> <p>20 making a representation on the record</p> <p>21 about what people said or didn't say.</p> <p>22 We have no knowledge about that. These</p> <p>23 are all redacted records so these are</p> <p>24 bad questions. They don't lead to any</p> <p>25 admissible evidence. It is only being</p>
Page 179	Page 181
<p>1 G Maxwell - Confidential</p> <p>2 I'm not asking you to speculate at all. I'm</p> <p>3 asking what you believe.</p> <p>4 A. You are asking me to speculate and</p> <p>5 I won't speculate.</p> <p>6 Q. I'm not asking you to speculate.</p> <p>7 I'm asking what you believe.</p> <p>8 MR. PAGLIUCA: She answered the</p> <p>9 question and we can move on.</p> <p>10 MS. McCAWLEY: She hasn't answered</p> <p>11 the question.</p> <p>12 MR. PAGLIUCA: We are not going to</p> <p>13 engage in this debate. She answered the</p> <p>14 question. If you want to mark it and</p> <p>15 move to compel an answer to the</p> <p>16 question, have at it. Okay.</p> <p>17 Q. Ms. Maxwell, is it your belief that</p> <p>18 Jeffrey Epstein interacted sexually with</p> <p>19 minors?</p> <p>20 A. Again, you are asking me the same</p> <p>21 type of question exactly but with different</p> <p>22 language. Again, my only knowledge of</p> <p>23 somebody who claims these things that I have</p> <p>24 personal knowledge of is Virginia. Virginia</p> <p>25 is an absolute liar and everything she has</p>	<p>1 G Maxwell - Confidential</p> <p>2 propounded to the witness to harass her.</p> <p>3 So we are done with these questions.</p> <p>4 MS. McCAWLEY: Are you done?</p> <p>5 MR. PAGLIUCA: Yes.</p> <p>6 Q. My question is, are you aware that</p> <p>7 Jeffrey Epstein was convicted of having</p> <p>8 relations with a minor child?</p> <p>9 MR. PAGLIUCA: She answered that</p> <p>10 question already.</p> <p>11 MS. McCAWLEY: I'm getting to my</p> <p>12 next question.</p> <p>13 MR. PAGLIUCA: Ask your next</p> <p>14 question. Don't keep asking the same</p> <p>15 question.</p> <p>16 MS. McCAWLEY: You are now</p> <p>17 shouting, I want the record to reflect</p> <p>18 that you are interrupting the</p> <p>19 deposition. I ask you to calm down,</p> <p>20 take a deep breath and please let me ask</p> <p>21 my questions.</p> <p>22 MR. PAGLIUCA: Your behavior is</p> <p>23 inappropriate.</p> <p>24 Q. I will ask you again.</p> <p>25 Do you believe that Jeffrey Epstein</p>

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1 G Maxwell - Confidential  
 2 interacted sexually with minors?  
 3 A. Again, I go back to this, my only  
 4 actual knowledge is with Virginia and  
 5 Virginia is a liar, so I can only talk to  
 6 what Virginia's story and as I said before  
 7 and there are so many examples, I mean  
 8 thousands of examples of her lies, that that  
 9 is the only thing I can talk to.  
 10 Q. Based on that you do not believe  
 11 that Jeffrey Epstein sexually abused minors?  
 12 A. Again, as I said, I'm only talking  
 13 to what I know, I can only talk to Virginia.  
 14 Q. So is it your belief that Jeffrey  
 15 Epstein did not sexually abuse minors?  
 16 A. Again, I can only talk to what I  
 17 know and I know that Virginia is a liar and  
 18 that what she said is a lie. So I can only  
 19 testify to what she accused and you guys put  
 20 in the press for salacious purposes and  
 21 whatever terrible, inappropriate, unethical  
 22 and terrible reasons you chose to do that  
 23 about me and I can testify those are all  
 24 lies.  
 25 Q. Do you know whether Jeffrey Epstein

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1 G Maxwell - Confidential  
 2 sexually abused any minor children?  
 3 A. Again, I only know 1000 percent  
 4 that Virginia is a liar. I can only talk to  
 5 Virginia, her lies and your inappropriate,  
 6 unethical, really unattractive, terrible use  
 7 of her and the way that you have abused the  
 8 system, used the press for purposes that are  
 9 unethical, inappropriate and appalling.  
 10 Q. Do you believe that Jeffrey Epstein  
 11 used massages to lure minors to have sex with  
 12 him?  
 13 A. Again, that is Virginia's  
 14 testimony, which is a lie.  
 15 Q. But do you believe that?  
 16 A. Again, I refer back to Virginia.  
 17 Q. I'm asking whether you believe it  
 18 or not?  
 19 A. I can only go with what I know and  
 20 I know Virginia is a liar and therefore  
 21 that's a lie.  
 22 Q. So you don't believe that?  
 23 A. I said, I only know that Virginia  
 24 is lying.  
 25 Q. Are you aware that Jeffrey Epstein

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1 G Maxwell - Confidential  
 2 is a registered sex offender?  
 3 A. I am.  
 4 Q. Are you aware that Jeffrey Epstein  
 5 paid considerable amounts of money to settle  
 6 lawsuits with the minor children that he had  
 7 sexual contact with?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I have no knowledge of those  
 11 issues.  
 12 Q. Why did you continue to maintain  
 13 contact with Jeffrey Epstein after he pled  
 14 guilty?  
 15 A. I'm a very loyal person and Jeffrey  
 16 was very good to me when my father passed  
 17 away and I believe that you need to be a good  
 18 friend in people's hour of need and I felt  
 19 that it was a very thoughtful, nice thing for  
 20 me to do to help in very limited fashion  
 21 which was helping if he had any issue with  
 22 his homes, in terms of the staffing issues.  
 23 It was very, very minor but I felt it was  
 24 thoughtful in somebody's hour of need.  
 25 Q. Did he continue to pay you during

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1 G Maxwell - Confidential  
 2 that time period?  
 3 A. I was paid a little.  
 4 Q. You were paid?  
 5 A. Yes.  
 6 Q. When you say a little, what you did  
 7 mean by that?  
 8 A. I don't recall exactly the amount.  
 9 Q. So in 2009 when you left him, what  
 10 were you being paid?  
 11 A. I just told you, I don't recall.  
 12 Q. Were you being paid \$100,000?  
 13 A. I just don't you I don't recall.  
 14 Q. Were you paid over a million  
 15 dollars?  
 16 A. I think I would remember over a  
 17 million dollars.  
 18 Q. So it was under a million dollars?  
 19 A. It was under a million dollars.  
 20 Q. Was it over \$500,000?  
 21 A. I just told you, it was under 500,  
 22 it was an amount of money less than \$500,000,  
 23 less than a million dollars and I did it out  
 24 of thoughtfulness and consideration for  
 25 somebody who was in trouble.

<p style="text-align: right;">Page 186</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Did you have an attorney to consult</p> <p>3 with during the criminal investigation of</p> <p>4 Jeffrey Epstein?</p> <p>5 A. I don't believe I did.</p> <p>6 Q. When did you learn that a search</p> <p>7 warrant was executed for the Palm Beach</p> <p>8 house?</p> <p>9 A. I don't recall exactly.</p> <p>10 Q. Were you present at the house in</p> <p>11 advance of the search warrant being executed?</p> <p>12 MR. PAGLIUCA: Object to the form</p> <p>13 of the question.</p> <p>14 A. I don't remember when the search</p> <p>15 warrant was executed and I don't remember the</p> <p>16 year that the search warrant was executed and</p> <p>17 whenever that was, I already testified, I was</p> <p>18 very, very infrequently at the house. So</p> <p>19 highly unlikely but I was there a couple of</p> <p>20 days, I just don't know which days it was in</p> <p>21 relation to the police situation.</p> <p>22 Q. Did you have a computer at the Palm</p> <p>23 Beach home that was a computer that you would</p> <p>24 use?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 188</p> <p>1 G Maxwell - Confidential</p> <p>2 people could use -- just like you would use</p> <p>3 if you needed to go online to get something,</p> <p>4 that people could use.</p> <p>5 Q. Was that on a desk that you would</p> <p>6 use in your work capacity when you were at</p> <p>7 the house?</p> <p>8 A. It was a desk, it was a room I was,</p> <p>9 I didn't really use that computer.</p> <p>10 Q. Were there images of naked girls</p> <p>11 whether they be under the age of 18 or over</p> <p>12 the age of 18 on that computer?</p> <p>13 A. I have no recollection of any naked</p> <p>14 people on that computer when I was there in</p> <p>15 2003, we are talking.</p> <p>16 Q. What about from say '99 to 2003?</p> <p>17 A. No, I can't recollect any naked</p> <p>18 pictures.</p> <p>19 Q. Why were the computers removed from</p> <p>20 the house before the search warrant was</p> <p>21 executed?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. I have no knowledge of anything</p> <p>25 like that.</p>
<p style="text-align: right;">Page 187</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Was there a computer available for</p> <p>3 use in the Palm Beach house?</p> <p>4 A. Can you be more specific.</p> <p>5 Q. Was there anywhere in the Palm</p> <p>6 Beach house where there was a computer where</p> <p>7 you said you worked for him and there were</p> <p>8 other staff in the house, was there ever a</p> <p>9 computer in the Palm Beach mansion that was</p> <p>10 accessible by you or other staff?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. I stopped being regularly at the</p> <p>14 house sometime in 2003 so from 2003 to when</p> <p>15 the police search was executed, I have no</p> <p>16 memory of what there was or what there was</p> <p>17 not. I can only testify for what was there</p> <p>18 when I was present largely.</p> <p>19 Q. So in 2003 when you were still</p> <p>20 there, was there a computer that was</p> <p>21 accessible to you or other staff at the</p> <p>22 house?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. There was a desktop computer that</p>	<p style="text-align: right;">Page 189</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Do you know where the computers are</p> <p>3 now?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 A. I don't know what computers you are</p> <p>7 talking of and I have no idea what you are</p> <p>8 referencing.</p> <p>9 Q. In 2003 you said there was a</p> <p>10 computer in a room on a desk?</p> <p>11 A. Right.</p> <p>12 Q. Do you know where that computer is</p> <p>13 now?</p> <p>14 A. I do not.</p> <p>15 Q. Did you take pictures of nude</p> <p>16 females in any of Epstein's homes or in and</p> <p>17 around the homes, out by the pool or anywhere</p> <p>18 like, in the Palm Beach home, the New York</p> <p>19 home, USVI home or the New Mexico home?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. Can you repeat the question.</p> <p>23 Q. Did you take pictures of nude woman</p> <p>24 over 18 or under 18, females, in any of</p> <p>25 Jeffrey Epstein's homes, inside or outside in</p>

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1 G Maxwell - Confidential  
 2 or around the home?  
 3 A. I think we need to distinguish  
 4 between anyone under the age of 18 and over  
 5 the age of 18.  
 6 Q. We will start with, did you take  
 7 pictures of nude females in or around any of  
 8 Jeffrey's homes of women or females that were  
 9 under the age of 18?  
 10 A. No.  
 11 Q. Did you take pictures of nude  
 12 females --  
 13 A. Nude you mean with no clothing on.  
 14 Q. Or half nude, with no top on, any  
 15 sort of nakedness to an individual.  
 16 In any of Jeffrey's homes, either  
 17 Palm Beach, New Mexico, USVI or New York  
 18 either outside by the pool, anywhere in or  
 19 around those homes of females over the age of  
 20 18?  
 21 A. So it is possible that I took  
 22 pictures of people that were somehow semi or  
 23 had some clothing on or no clothes on but at  
 24 no time were any of these pictures remotely  
 25 inappropriate. They were, you could see them

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1 G Maxwell - Confidential  
 2 in a mainstream magazine today, there would  
 3 be no inappropriateness, they would be  
 4 covered, concealed, you wouldn't see anything  
 5 at all.  
 6 The types of -- first, I took very  
 7 few and they were always by request, this was  
 8 a picture you could put on your -- gift to  
 9 your parent or to your grandparents to put on  
 10 their mantel piece . It would be a very  
 11 benign sort of attractive picture where you  
 12 wouldn't see anything.  
 13 Q. Who would request those pictures?  
 14 A. From time to time, people, men and  
 15 women would ask to have nice photographs of  
 16 them taken.  
 17 Q. And did Jeffrey Epstein request  
 18 those pictures?  
 19 A. I don't ever recall him asking me  
 20 to take pictures.  
 21 Q. Did you give him pictures of naked  
 22 females as a present?  
 23 A. I don't recall ever giving a  
 24 present of -- I don't know why a photograph  
 25 would constitute a gift.

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1 G Maxwell - Confidential  
 2 Q. Not as a gift.  
 3 Do you recall ever giving Jeffrey  
 4 Epstein pictures that you've taken of these  
 5 individuals in a naked state?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. First of all, we've already  
 9 established that they are not naked state  
 10 photographs.  
 11 Q. A piece of them being naked as you  
 12 described.  
 13 A. I said they would be attractive as  
 14 you would see in mainstream magazines and  
 15 those pictures could be a picture of a hand  
 16 or a foot, they didn't necessarily  
 17 constitute -- I know where you are headed  
 18 with this and it's nowhere appropriate and  
 19 it's really unattractive.  
 20 Q. I'm not headed anywhere. I'm just  
 21 asking the questions. Did you give Jeffrey  
 22 Epstein any of these pictures that you took  
 23 of females in the state that you described?  
 24 A. I can't recall ever giving him  
 25 pictures but it is possible that I took

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1 G Maxwell - Confidential  
 2 pictures of people that would end up -- or a  
 3 friend of his that he would have -- not naked  
 4 or not inappropriate in any way, that he  
 5 might have somewhere in his house.  
 6 Q. Name for me all the individuals who  
 7 you took these pictures of?  
 8 A. It's entirely impossible for me to  
 9 name people. First of all, it was just -- it  
 10 would not be possible, I took thousands of  
 11 photos, not of people, I mostly take pictures  
 12 of landscapes and things. I have no  
 13 recollection specifically of people that I  
 14 took pictures of.  
 15 Q. So you can't remember, is it your  
 16 testimony you can't remember one person that  
 17 you took a picture of in either a naked or  
 18 semi naked state?  
 19 A. I seriously cannot recall. I just  
 20 don't recall.  
 21 Q. Did you take a picture of Virginia  
 22 Roberts either alone or with another  
 23 individual in a naked state?  
 24 A. I have never taken, I believe, any  
 25 pictures of two people in any type of



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1 G Maxwell - Confidential  
 2 situation, naked as you describe.  
 3 Q. Did you take a picture of Virginia  
 4 Roberts on her own without another individual  
 5 in it in a naked state?  
 6 A. I don't recall ever taking a  
 7 picture of Virginia -- naked, we are not  
 8 referring to someone with no clothing on at  
 9 all, we are referring to someone that could  
 10 be semi clad or could have a towel or we are  
 11 not referring to anything inappropriate.  
 12 Q. Was this a hobby of yours to take  
 13 pictures of the type that you are describing?  
 14 MR. PAGLIUCA: Object to the form.  
 15 A. I just testified, I didn't take  
 16 pictures of many people. My preference is  
 17 pictures for landscapes and for architectural  
 18 pieces.  
 19 Q. Where are those pictures today?  
 20 A. I have no idea.  
 21 Q. Do you have them in your home?  
 22 A. I do not.  
 23 Q. Do you have them on your computer?  
 24 A. I do not.  
 25 Q. What has Jeffrey Epstein told you

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1 G Maxwell - Confidential  
 2 about the allegations related to the criminal  
 3 investigation that he was involved in?  
 4 A. I really can't say, not because I  
 5 don't want to say but I just think of what he  
 6 has said to me over the course of this time.  
 7 Q. Did he explain it to you and  
 8 explain what the charges were against him?  
 9 A. I never had a detailed conversation  
 10 with him, as I recall.  
 11 Q. Not detailed, just did he explain  
 12 anything that was happening to him?  
 13 A. I haven't spoken to him for so  
 14 long. I can't possibly testify to what  
 15 conversations I had with him over the course  
 16 of time.  
 17 Q. Did he talk to you about any of the  
 18 girls that were making allegations against  
 19 him other than Virginia?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. You are talking about the police  
 23 records again, all of that?  
 24 Q. Yes.  
 25 A. I have never had a conversation

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1 G Maxwell - Confidential  
 2 about those things.  
 3 Q. What has Jeffrey Epstein told you  
 4 about Virginia Roberts?  
 5 A. That she is a liar.  
 6 Q. What does he base that on?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. You would have to check with him.  
 10 I can tell you why I think she is a liar, I'm  
 11 happy to do that.  
 12 Q. Did he tell you he did not have  
 13 sexual relations with Virginia Roberts?  
 14 A. I can only testify what I know.  
 15 Q. I'm asking, has he told you that he  
 16 did not have sexual relations with Virginia  
 17 Roberts?  
 18 A. I can only tell you what I know  
 19 about Virginia Roberts, I cannot tell you  
 20 what he knows about Virginia Roberts.  
 21 Q. I'm asking, did he tell you that he  
 22 did not have sexual relations with Virginia  
 23 Roberts?  
 24 A. All he told me is she is a liar.  
 25 Q. That's all he said about Virginia

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1 G Maxwell - Confidential  
 2 Roberts?  
 3 A. We went through all the lies that  
 4 you have sold to the papers and sold in  
 5 general and we have analyzed her lies and  
 6 your lies and your inappropriate behavior in  
 7 detail.  
 8 Q. Did he ever say that he did not  
 9 have sexual relations with Virginia Roberts?  
 10 A. I just testified that we went  
 11 through all of her lies.  
 12 Q. I understand what you said. I'm  
 13 asking you a question.  
 14 Did he ever tell you that he never  
 15 had sex with Virginia Roberts?  
 16 A. I don't recall whether he ever -- I  
 17 don't know I ever had that question. We  
 18 focused on the lies she did say she had with  
 19 him as relates to me. I don't remember  
 20 asking him about his problems with her. I'm  
 21 interested in what she says about myself.  
 22 Q. Did you also talk about what things  
 23 that Virginia Roberts was saying that were  
 24 true?  
 25 A. There isn't anything that she said

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<p>1 G Maxwell - Confidential</p> <p>2 that was true.</p> <p>3 Q. Nothing she said that you are aware</p> <p>4 of is true?</p> <p>5 A. I think she is correct when she</p> <p>6 talks about what her name is.</p> <p>7 Q. Anything else?</p> <p>8 A. I'm sure there must be one or two</p> <p>9 other details but they are so far and few</p> <p>10 between, I would have to look in detail at</p> <p>11 all of her allegations to pinpoint what</p> <p>12 possibly could be true.</p> <p>13 Q. Did you ever ask Jeffrey if he had</p> <p>14 sex with minors?</p> <p>15 A. I have never been asked that</p> <p>16 question.</p> <p>17 Q. You never asked him that question.</p> <p>18 What analysis did Jeffrey do to</p> <p>19 determine that the statements Virginia</p> <p>20 Roberts were making were lies?</p> <p>21 MR. PAGLIUCA: Objection to the</p> <p>22 form and foundation.</p> <p>23 A. Ask me again, please.</p> <p>24 Q. What analysis did Jeffrey do to</p> <p>25 determine that the statements that Virginia</p>	<p>1 G Maxwell - Confidential</p> <p>2 communications subject to a joint</p> <p>3 defense agreement or common interest</p> <p>4 agreement, I'm telling her not to</p> <p>5 answer. To the extent she has</p> <p>6 information outside of those things, she</p> <p>7 is permitted to answer.</p> <p>8 Q. Do you understand?</p> <p>9 So if it was a conversation with a</p> <p>10 lawyer which I'm not asking about, I don't</p> <p>11 want you to tell me about your conversations</p> <p>12 with lawyers.</p> <p>13 I want you to tell me whether</p> <p>14 Jeffrey Epstein ever told you what he</p> <p>15 analyzed in order to determine which of -- of</p> <p>16 what Virginia were saying were lies?</p> <p>17 A. I do not know what he did, no.</p> <p>18 So you agree she is lying, Singrid.</p> <p>19 Q. I do not agree with that and I'm</p> <p>20 asking the questions.</p> <p>21 A. You just said her lies.</p> <p>22 Q. I'm repeating a statement you made.</p> <p>23 Q. Are you saying it's an obvious lie</p> <p>24 that Jeffrey Epstein engaged in sexual</p> <p>25 conduct with Virginia while Virginia was</p>
Page 199	Page 201
<p>1 G Maxwell - Confidential</p> <p>2 Roberts were making were lies?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation. And to the extent</p> <p>5 that any of this answer calls for any</p> <p>6 privileged communication, I'm</p> <p>7 instructing, with myself or another</p> <p>8 lawyer representing you or in any common</p> <p>9 interest agreement, I'm instructing you</p> <p>10 not to answer.</p> <p>11 MS. McCAWLEY: The court ruled she</p> <p>12 is entitled and you had to produce</p> <p>13 documents about communications with</p> <p>14 Jeffrey, that's what I'm asking about.</p> <p>15 I'm not asking about communications with</p> <p>16 lawyers.</p> <p>17 Q. I'm asking what analysis did</p> <p>18 Jeffrey do to determine that the statements</p> <p>19 that Virginia Roberts was making were lies,</p> <p>20 if you know?</p> <p>21 MR. PAGLIUCA: My objection is to</p> <p>22 the extent she learned any of that</p> <p>23 information as a result of either a</p> <p>24 privileged communication from a lawyer,</p> <p>25 one of her lawyers or a privileged</p>	<p>1 G Maxwell - Confidential</p> <p>2 underage?</p> <p>3 A. I can only testify to what I saw</p> <p>4 and what I was present for, so if you are</p> <p>5 asking me what I saw then I am happy to</p> <p>6 testify. I cannot testify to what somebody</p> <p>7 else did or didn't do.</p> <p>8 Q. Did you issue a statement to your</p> <p>9 press agent, Ross Gow in 2015, stating that</p> <p>10 Virginia Roberts' claims were, quote, obvious</p> <p>11 lies?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 Q. You can answer.</p> <p>15 A. You need to reask me the question.</p> <p>16 Q. Sure.</p> <p>17 Did you issue a press statement</p> <p>18 through your press agent, Ross Gow, in</p> <p>19 January of 2015, stating that Virginia</p> <p>20 Roberts' claims were, quote, obvious lies?</p> <p>21 MR. PAGLIUCA: Objection to the</p> <p>22 form and foundation.</p> <p>23 A. Can you ask it a different way,</p> <p>24 please?</p> <p>25 Q. I will ask it again and you can</p>

<p style="text-align: right;">Page 202</p> <p>1 G Maxwell - Confidential</p> <p>2 listen carefully.</p> <p>3 Did you issue a press statement</p> <p>4 through your press agent, Ross Gow, in</p> <p>5 January of 2015, where you stated that</p> <p>6 Virginia Roberts' claims were, quote, obvious</p> <p>7 lies?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. So my lawyer, Philip Barden</p> <p>11 instructed Ross Gow to issue a statement.</p> <p>12 Q. Today, did you say that Virginia</p> <p>13 lied about, quote, absolutely everything?</p> <p>14 A. I said that there are some things</p> <p>15 she may not have lied about.</p> <p>16 Q. So are you saying it's an obvious</p> <p>17 lie that Jeffrey Epstein engaged in sexual</p> <p>18 contact with Virginia while Virginia was</p> <p>19 underage?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. Can you ask the question again,</p> <p>23 please?</p> <p>24 Q. Are you saying it's an obvious lie</p> <p>25 that Jeffrey Epstein engaged in sexual</p>	<p style="text-align: right;">Page 204</p> <p>1 G Maxwell - Confidential</p> <p>2 Gow and Philip Barden decided to put -- I can</p> <p>3 testify to what Virginia's obvious lies are</p> <p>4 as regards to me. I cannot make</p> <p>5 representations about all the many lies she</p> <p>6 may or may not have told about Jeffrey.</p> <p>7 Q. So is Virginia lying when she says,</p> <p>8 is it an obvious lie when she says that she</p> <p>9 had sex with Jeffrey Epstein while she was</p> <p>10 underage?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. Again, I'm testifying to what I</p> <p>14 know to be true. I can only testify to all</p> <p>15 the many lies she told about me. I cannot</p> <p>16 testify to what lies she told about somebody</p> <p>17 else. Given she told so many about me, one</p> <p>18 can probably infer she is lying about</p> <p>19 everything.</p> <p>20 Q. So you think she is lying when she</p> <p>21 said she had sex with Jeffrey Epstein when</p> <p>22 she was underage?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. Again, I can only talk about what I</p>
<p style="text-align: right;">Page 203</p> <p>1 G Maxwell - Confidential</p> <p>2 conduct with Virginia while Virginia was</p> <p>3 underage?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 Q. You can answer.</p> <p>7 A. Try again, please.</p> <p>8 Q. Are you saying that it's an obvious</p> <p>9 lie that Jeffrey Epstein engaged in sexual</p> <p>10 conduct with Virginia while Virginia was</p> <p>11 underage?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. Again, I'm telling you, first of</p> <p>15 all, it was a statement that was issued by my</p> <p>16 lawyer and -- through my lawyer to Ross Gow.</p> <p>17 Q. I understand that. I'm asking you,</p> <p>18 are you saying that it's an obvious lie that</p> <p>19 Jeffrey Epstein engaged in sexual conduct</p> <p>20 with Virginia while Virginia was underage.</p> <p>21 Is that a lie?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 Q. You can answer.</p> <p>25 A. So I cannot testify to what Ross</p>	<p style="text-align: right;">Page 205</p> <p>1 G Maxwell - Confidential</p> <p>2 can positively say myself, not what somebody</p> <p>3 else is going to represent.</p> <p>4 Q. When you were saying that she was,</p> <p>5 her claims of having sex with Jeffrey Epstein</p> <p>6 were obvious lies, are you saying she is</p> <p>7 lying about engaging in sexual conduct with</p> <p>8 Jeffrey Epstein when she was underage?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 Q. You can answer.</p> <p>12 A. Again, this was a statement that</p> <p>13 was put out from my lawyer through my press</p> <p>14 person in London. And I can only testify to</p> <p>15 the obvious lies that she says about me. I</p> <p>16 cannot make representations about lies she</p> <p>17 says about someone else, but she lies so many</p> <p>18 times about me, one can probably infer she is</p> <p>19 lying about everything.</p> <p>20 Q. So is she not lying when -- is she</p> <p>21 telling the truth when she says she had sex</p> <p>22 with Jeffrey Epstein when she was underage?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. Again, I don't know how else to</p>

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 2 tell you, I can only talk about what I know  
 3 to be true. What I know is her story about  
 4 how she claims that initial situation  
 5 happened is so egregiously false and such a  
 6 giant fat enormous, repulsive, disgusting,  
 7 inappropriate, vile lie, that that I can  
 8 testify to.  
 9 Q. Was she lying when she said she met  
 10 you at Mar-a-Lago?  
 11 A. Again I already testified I don't  
 12 recall meeting her at Mar-a-Lago.  
 13 Q. We showed you a document where you  
 14 said you met her at Mar-a-Lago when she was  
 15 17, is that correct?  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 A. I think I already testified to  
 19 that. What I remembered based on all the  
 20 rubbish she has written and all the many  
 21 articles I have read, maybe in the moment  
 22 when I wrote that, have caused me to have  
 23 that but on reflection I don't recall it as I  
 24 sit here today.  
 25 Q. Are you saying that it was an

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1 G Maxwell - Confidential  
 2 obvious lie that you approached Virginia  
 3 while she was under age at Mar-a-Lago?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. First of all, we can all agree  
 7 here, all of you sitting here that the lies  
 8 that you perpetrated in the press that she  
 9 was 15 and we should all agree now that that  
 10 is fake, a lie that was perpetrated between  
 11 all of you to make the story more exciting,  
 12 can we agree on that?  
 13 Q. That is not my question.  
 14 A. Can we agree she was not the age  
 15 she said and you put that in the press, that  
 16 is obviously, manifestly, absolutely, totally  
 17 a lie.  
 18 MS. McCAWLEY: I am going to put on  
 19 the record, Ms. Maxwell very  
 20 inappropriately and very harshly pounded  
 21 our law firm table in an inappropriate  
 22 manner. I ask she take a deep breath,  
 23 and calm down. I know this is a  
 24 difficult position but physical assault  
 25 or threats is not appropriate, so no

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 2 pounding, no stomping, no, that's not  
 3 appropriate.  
 4 A. Can we be clear, I didn't threaten  
 5 anybody.  
 6 MR. PAGLIUCA: Stop, you made your  
 7 record, there is no dent in the table.  
 8 I don't see any chips. Can we take a  
 9 break now.  
 10 MS. McCAWLEY: I think it's  
 11 appropriate to take a break.  
 12 THE VIDEOGRAPHER: It's 1:56 and we  
 13 are off the record.  
 14 (Recess.)  
 15 THE VIDEOGRAPHER: It's now 2:13,  
 16 we're starting disk No. 5 and we are  
 17 back on the record.  
 18 Q. Ms. Maxwell, how old was Virginia  
 19 Roberts when you met her in Mar-a-Lago?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I know today that she was 17 years  
 23 old.  
 24 Q. Are you saying that it's an obvious  
 25 lie that Virginia traveled on Jeffrey

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1 G Maxwell - Confidential  
 2 Epstein's airplanes?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 Q. You can answer.  
 6 A. Are you referring to my statement  
 7 where that says that?  
 8 Q. I'm referring to the language you  
 9 use in your statement that says, obvious  
 10 lies?  
 11 A. Can you read my entire statement?  
 12 Q. Sure, let me pass it out.  
 13 (Maxwell Exhibit 10, email, marked  
 14 for identification.)  
 15 Q. This is Bates GM 00068 and we will  
 16 mark it as -- what you have in front of you  
 17 is a statement at the top. This was produced  
 18 by your counsel, it is indicated Bates No.  
 19 GM 00068. At the top the date reflects  
 20 January 2, 2015 from, appears to be a Ross  
 21 [REDACTED] subject line, is you and  
 22 then there is a number of individuals you can  
 23 see at the top that are copied on this that  
 24 is sent to and bcc'd on this statement.  
 25 The statement, there are two parts



<p style="text-align: right;">Page 210</p> <p>1 G Maxwell - Confidential</p> <p>2 of it. There is an opening email that says,</p> <p>3 please find an attached quotable statement on</p> <p>4 behalf of Ms. Maxwell and there is more</p> <p>5 language there and it's from Ross Gow and</p> <p>6 then it says in the body of it, Jane Doe No.</p> <p>7 3 or Jane Doe 3 is Virginia Roberts so not a</p> <p>8 new individual. The allegations made by, and</p> <p>9 it says Victoria but I believe that means</p> <p>10 Virginia Roberts, against Ghislaine Maxwell</p> <p>11 are not true. The original allegations are</p> <p>12 not new and have been fully responded to and</p> <p>13 shown to be untrue. And the next paragraph</p> <p>14 says, Each time the story is retold, it</p> <p>15 changes with new salacious details about</p> <p>16 public figures and world leaders and now it</p> <p>17 is alleged by Ms. Roberts that Al Dershowitz</p> <p>18 is involved in having sexual relations with</p> <p>19 her which he denies. Ms. Roberts claims are</p> <p>20 obvious lies and should be treated as such</p> <p>21 and not publicized as news as they are</p> <p>22 defamatory.</p> <p>23 The last paragraph states,</p> <p>24 Ghislaine Maxwell's original response to the</p> <p>25 lies and defamatory claims remains the same.</p>	<p style="text-align: right;">Page 212</p> <p>1 G Maxwell - Confidential</p> <p>2 testified those aren't federally mandated</p> <p>3 things and I can see her name on it but</p> <p>4 that's what I -- I told you I don't recall</p> <p>5 her on any planes.</p> <p>6 Q. Is is that one of Virginia's</p> <p>7 obvious lies?</p> <p>8 A. There are more obvious ones.</p> <p>9 Q. Is that one of them?</p> <p>10 A. I can't testify to her being on a</p> <p>11 plane or not.</p> <p>12 Q. So is that an obvious lie?</p> <p>13 A. There are more obvious lies, like</p> <p>14 Clinton.</p> <p>15 Q. I understand there are more obvious</p> <p>16 ones. I'm asking you, is the fact that she</p> <p>17 said she traveled on Epstein's planes an</p> <p>18 obvious lie?</p> <p>19 A. I think we can probably say because</p> <p>20 you see her name on a plane record and she</p> <p>21 went from A to B, that would not be the</p> <p>22 obvious lie that I would pick.</p> <p>23 Q. What obvious lie were you picking</p> <p>24 when you made this statement?</p> <p>25 A. There are so many that I would be</p>
<p style="text-align: right;">Page 211</p> <p>1 G Maxwell - Confidential</p> <p>2 Maxwell strongly denies allegations of the --</p> <p>3 strongly denies allegations of an unsavory</p> <p>4 nature which have appeared in the British</p> <p>5 press and elsewhere and reserves her right to</p> <p>6 seek redress at the repetition of such old</p> <p>7 defamatory claims.</p> <p>8 Are you saying that it's an obvious</p> <p>9 lie that Virginia Roberts traveled on Jeffrey</p> <p>10 Epstein's planes?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. I'm saying what's an obvious lie</p> <p>14 and I think we can all agree, you just had</p> <p>15 the case tossed out by Alan Dershowitz. He</p> <p>16 just got removed from the case because you</p> <p>17 put him in a case that he wasn't supposed to</p> <p>18 be in so what was said about him is not true.</p> <p>19 Q. Are you saying that it's an obvious</p> <p>20 lie that Virginia Roberts traveled on Jeffrey</p> <p>21 Epstein's plane?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. You have given me plane records</p> <p>25 that has her name on it but as I already</p>	<p style="text-align: right;">Page 213</p> <p>1 G Maxwell - Confidential</p> <p>2 thrilled to go through all of them.</p> <p>3 Q. Let's go through them.</p> <p>4 What's the first one?</p> <p>5 A. Her characterization of the first</p> <p>6 meeting at Mar-a-Lago.</p> <p>7 Q. What part of that was an obvious</p> <p>8 lie?</p> <p>9 A. The characterization that she said</p> <p>10 that she said she was accosted. She looked</p> <p>11 like, as best as I can recall, if I met her</p> <p>12 in Mar-a-Lago as she claims, she worked at</p> <p>13 Mar-a-Lago, she claims, and her statement she</p> <p>14 worked at Mar-a-Lago, she would have been</p> <p>15 dressed as all the spa people in Mar-a-Lago</p> <p>16 would have been. It would have been</p> <p>17 impossible to identify her as someone other</p> <p>18 than someone who worked at a spa. She made</p> <p>19 many claims, she has been a bathroom</p> <p>20 attendant, front of house attendant, we don't</p> <p>21 know what she was, so her obvious lies are</p> <p>22 her contradictory of her own personal</p> <p>23 statements within that.</p> <p>24 Q. So what part of her statement</p> <p>25 relating to Mar-a-Lago --</p>

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 2 A. I'm carrying on.  
 3 Q. I'm sorry. I thought you were  
 4 done.  
 5 A. Please. Her statement also that  
 6 she was driven by her father to Palm Beach.  
 7 She was driven by her mother, as a matter of  
 8 fact. Her whole entire characterization of  
 9 the first meeting with Jeffrey, as I was  
 10 outside speaking to her mother.  
 11 Q. Let me stop you there, so we don't  
 12 get too far ahead. Let me make sure I  
 13 understand your testimony.  
 14 The first, in the first piece when  
 15 you were talking, I believe you said and  
 16 correct me if I'm wrong, that her  
 17 characterization of the first meeting at  
 18 Mar-a-Lago was an obvious lie.  
 19 What part of that meeting was an  
 20 obvious lie?  
 21 A. By her own testimony, all her  
 22 various many different descriptions of what  
 23 she was or wasn't or where she was or wasn't,  
 24 they have all changed. She was either front  
 25 of house or bathroom attendant. I don't know

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1 G Maxwell - Confidential  
 2 what she was, so just by her own words, one  
 3 doesn't know what's true and what isn't true.  
 4 Q. Are you saying what position she  
 5 said she was working in, is that what you are  
 6 considering the obvious lie?  
 7 A. I said inconsistency within her own  
 8 statement from everything, so in the  
 9 beginning it starts off with different  
 10 statements.  
 11 Q. Then I believe you said the second  
 12 piece was that she was driven by her father?  
 13 A. I said she was driven by her  
 14 mother.  
 15 Q. That's the obvious lie?  
 16 A. It's an obvious lie to me.  
 17 Q. You said why don't you state it in  
 18 your own words but the characterization of  
 19 how she was with Jeffrey, what about that is  
 20 an obvious lie?  
 21 A. I was standing outside talking to  
 22 her mother so the entire story is a  
 23 fabrication.  
 24 Q. Did she not have sex with Jeffrey  
 25 Epstein during that first massage?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I was talking to her mother so...  
 5 Q. Do you know whether that's an  
 6 obvious lie, whether she had sex in that room  
 7 or not?  
 8 A. Her story about what happened --  
 9 let's also be -- the story as first hit the  
 10 press was that somebody else led her to  
 11 Jeffrey's room, it was not me and then it  
 12 turned to being me so we have an obviously  
 13 important inconsistency, lie in my -- that's  
 14 how I would characterize a lie. It cannot be  
 15 me or somebody else, it can only be one or  
 16 the other.  
 17 Q. Who is the other person she said  
 18 took her to the room?  
 19 A. Why don't you ask her.  
 20 Q. I'm asking you.  
 21 A. How would I possibly know.  
 22 Q. You are saying that's a lie.  
 23 A. It was a lie in the papers, she  
 24 said it in the newspaper, it was in the  
 25 newspaper.

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1 G Maxwell - Confidential  
 2 Q. How do you know she wasn't  
 3 identifying you?  
 4 A. She said somebody.  
 5 Q. How do you know that somebody  
 6 wasn't you?  
 7 A. Why did it suddenly become me, why  
 8 not say it was me and be done with it.  
 9 Q. So it's a lie because she  
 10 originally may not have named you and then  
 11 named you later?  
 12 A. It's obviously inconsistent to  
 13 somebody who wasn't me.  
 14 Q. How do you know it wasn't you?  
 15 A. I know it wasn't me because I was  
 16 talking to her mother.  
 17 Q. But she then named you, is what you  
 18 are saying?  
 19 A. That's an obvious lie.  
 20 Q. She named you?  
 21 A. It's an obvious lie because I  
 22 wasn't even in the house.  
 23 Q. Is it an obvious -- who did lead  
 24 her up to Jeffrey's room while you were  
 25 talking to her mother?

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1 G Maxwell - Confidential  
 2 A. You would have to ask Virginia, I  
 3 don't know if she was led up to his room.  
 4 Q. You were standing with the mother,  
 5 is that correct?  
 6 A. That's correct.  
 7 Q. Who was working at the house that  
 8 day?  
 9 A. I believe John Alessi was.  
 10 A. Would John Alessi typically lead  
 11 someone up to the room where Jeffrey was  
 12 having a massage?  
 13 A. I don't know she was led up to the  
 14 room to have a massage.  
 15 Q. She would have found her way on her  
 16 own?  
 17 A. I would suggest that that entire  
 18 story never happened at all in any of its  
 19 form.  
 20 Q. If you stood outside with the  
 21 mother, what did you think happened inside  
 22 then?  
 23 A. I believe that somebody, it wasn't  
 24 me, John Alessi probably took her to meet  
 25 Jeffrey Epstein while he was working at his

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 2 desk and they had a conversation.  
 3 Q. Did Jeffrey tell you that?  
 4 A. No but that would have been a  
 5 normal interaction. I don't believe for a  
 6 second -- I know her entire characterization  
 7 didn't happen because I was outside talking  
 8 to her mother the entire time.  
 9 Q. Why would she have come for a  
 10 massage and not given a massage?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. We are talking about her  
 14 characterization of the first time that she  
 15 came to the house.  
 16 Q. If I'm following you correctly,  
 17 you're saying she walked in and would have  
 18 gone to -- it's your assumption she would  
 19 have gone and talked to Jeffrey and left?  
 20 A. When I was working for Jeffrey,  
 21 typically he would meet someone before  
 22 getting a massage from them to see if he  
 23 wanted to have a massage from them,  
 24 typically.  
 25 Q. So he would not have someone come

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 2 up to the room and start a massage?  
 3 A. He would not.  
 4 Q. So the young girls in the police  
 5 report who say they came over and were led up  
 6 to the room on the first day, would they be  
 7 wrong about that?  
 8 MR. PAGLIUCA: Objection to form  
 9 and foundation.  
 10 A. I can't comment what happened when  
 11 I was not at the house. I can only comment  
 12 when I was at the house.  
 13 Q. Was there ever a time where a woman  
 14 came to the house for the first time to give  
 15 a massage and Jeffrey had the massage that  
 16 day?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. Can we talk about adult  
 20 professional masseuses, please?  
 21 Q. I'm asking, whether adult or  
 22 underage?  
 23 A. I'm not interested in talking about  
 24 underage. I can only testify to what I know,  
 25 professional masseuses, adult, I cannot

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1 G Maxwell - Confidential  
 2 testify to anything else.  
 3 Q. Why can't you testify to an  
 4 underage girl that came over and was led up  
 5 to the room for a massage?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. The police records you are  
 9 referring to?  
 10 Q. You are saying that didn't happen.  
 11 You're saying I can only testify to adults  
 12 that came for an interview and were led up to  
 13 the room. Why can't you testify to whether  
 14 an underage girl was brought in for an  
 15 interview and led up --  
 16 MR. PAGLIUCA: Objection to the  
 17 form and foundation.  
 18 Q. Go ahead.  
 19 A. Can you reask the question.  
 20 Q. Why can't you testify as to an  
 21 underage girl who came over for an interview  
 22 and then was then led up to the room for the  
 23 massage?  
 24 A. You've mangled your entire  
 25 question. Can you please reask that in a way

<p style="text-align: right;">Page 222</p> <p>1 G Maxwell - Confidential</p> <p>2 that I can answer it correctly?</p> <p>3 Q. Why can you not testify as to</p> <p>4 whether an underage girl, you said you can</p> <p>5 testify as to females that were over the age</p> <p>6 of 18, why can't you testify as to whether an</p> <p>7 underage girl came over for an interview and</p> <p>8 on the same day --</p> <p>9 A. I don't know what you mean by</p> <p>10 interview.</p> <p>11 Q. You just said that Jeffrey Epstein</p> <p>12 interviewed, it was your word, interviewed</p> <p>13 the masseuses before they gave massages, is</p> <p>14 that correct?</p> <p>15 A. The word interview is making me --</p> <p>16 I'm English, so you could have some</p> <p>17 difficulty understanding the way I</p> <p>18 communicate.</p> <p>19 Q. I'm using your word.</p> <p>20 A. Then I will reuse it a different</p> <p>21 word. He would meet them because receiving a</p> <p>22 massage is something you want to make sure</p> <p>23 you are comfortable with the person and so</p> <p>24 interview is not the correct word but you</p> <p>25 would meet them to have a conversation with</p>	<p style="text-align: right;">Page 224</p> <p>1 G Maxwell - Confidential</p> <p>2 time for a massage at that time or B, whether</p> <p>3 he could have a massage at that moment.</p> <p>4 Q. Was Virginia an adult when she came</p> <p>5 over, was she over 18?</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation.</p> <p>8 A. I think we established, as of</p> <p>9 today, we are all aware, everyone in this</p> <p>10 room that she was 17.</p> <p>11 Q. So you have been present when a</p> <p>12 minor was brought over for a massage for</p> <p>13 Jeffrey?</p> <p>14 A. Can I say, as you are able to have</p> <p>15 a massage at 17, so she came as a masseuse.</p> <p>16 Q. I'm not saying whether or not you</p> <p>17 are able to. I'm saying you've been present</p> <p>18 at Jeffrey's home when an underage minor has</p> <p>19 come over to give him a massage?</p> <p>20 A. That's just not how that works.</p> <p>21 You are able to be a masseuse at 17 so she</p> <p>22 came to give -- for a massage, at 17 you are</p> <p>23 able to come and give a massage.</p> <p>24 Q. I'm not asking whether she is able</p> <p>25 to do it. I'm asking whether you were</p>
<p style="text-align: right;">Page 223</p> <p>1 G Maxwell - Confidential</p> <p>2 them to see if you want to have a massage</p> <p>3 with that person.</p> <p>4 Q. Did Jeffrey Epstein ever meet an</p> <p>5 underaged girl and on the same day receive a</p> <p>6 massage from that girl?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. I can't possibly testify to what</p> <p>10 happened after I was not at the house.</p> <p>11 Q. If you are aware, at any time you</p> <p>12 were at the house, did you ever see that?</p> <p>13 MS. MENNINGER: Let her finish the</p> <p>14 question.</p> <p>15 A. I can only testify to people who</p> <p>16 were adult professional masseuses who came to</p> <p>17 the house. I cannot testify to something I'm</p> <p>18 not party to and don't know about. I can</p> <p>19 only testify to what I saw. So when</p> <p>20 professional adult masseuse, male and/or</p> <p>21 females would come to the house, typically</p> <p>22 when I was there, typically he would meet</p> <p>23 with them prior, to have a conversation with</p> <p>24 them about their experience, whatever, to</p> <p>25 decide whether it would then A, if he had</p>	<p style="text-align: right;">Page 225</p> <p>1 G Maxwell - Confidential</p> <p>2 present at the home when a girl under the age</p> <p>3 of 18 came over for the purposes of giving a</p> <p>4 massage?</p> <p>5 MR. PAGLIUCA: Objection to the</p> <p>6 form and foundation.</p> <p>7 Q. You can answer.</p> <p>8 A. You can be a professional masseuse</p> <p>9 at 17 in Florida, so as far as I am aware, a</p> <p>10 professional masseuse showed up for a</p> <p>11 massage. There is nothing inappropriate or</p> <p>12 incorrect about that and your</p> <p>13 mischaracterization of it, I think is</p> <p>14 unfortunate.</p> <p>15 Q. How many teenagers did he have that</p> <p>16 were professional masseuses that worked in</p> <p>17 his home?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 Q. How many?</p> <p>21 A. First of all, I am not aware of</p> <p>22 teenagers who worked in his home.</p> <p>23 Q. You are aware of Virginia Roberts</p> <p>24 and you've stated she was 17 and she worked</p> <p>25 for him, correct?</p>



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2 A. No. I did not state that at all,  
3 you are mischaracterizing my words and what I  
4 said.

5 What I said was that we can all  
6 agree and I think at this point there is not  
7 one person in this room, however much you  
8 would like her to be younger, to say she was  
9 not 17 because that has been a very offensive  
10 thing that you have all done. So she was 17.  
11 At 17 you are allowed to be a professional  
12 masseuse and as far as I'm concerned, she was  
13 a professional masseuse. There is nothing  
14 inappropriate or incorrect about her coming  
15 at that time to give a massage. Her entire  
16 characterization of her first time at the  
17 house was to me an obvious lie, given it was  
18 impossible for her entire story to take place  
19 given I was speaking to her mother the entire  
20 she was at the house.

21 Q. So it was impossible that day, that  
22 first day she came and you were speaking to  
23 the mother, for Virginia Roberts to have had  
24 sex with Jeffrey Epstein during the time that  
25 you were outside with her mother?

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1 G Maxwell - Confidential  
2 MR. PAGLIUCA: Objection to the  
3 form and foundation.  
4 A. You, again, are completely  
5 mischaracterizing. I can only testify to  
6 what I heard obvious lies about me and her  
7 obvious lies about me are that she, as you  
8 put out to the papers and every other which  
9 way, went upstairs with her, didn't happen.  
10 So that to me is an absolute, obvious lie. I  
11 also don't believe that her -- her  
12 mischaracterization of the length of time she  
13 was there because as I recall, she just met  
14 with Jeffrey and then left with her mother.  
15 That's my recollection.

16 Q. So you were standing outside the  
17 entire time that Virginia was in the house,  
18 is that correct?

19 A. That is correct.

20 Q. So can you testify as to whether or  
21 not, do you know either from Jeffrey or any  
22 other source whether or not Virginia Roberts  
23 had sex with Jeffrey on that first day that  
24 she was at the house?

25 A. We can categorically state,

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1 G Maxwell - Confidential  
2 absolutely 1000 percent that she did not have  
3 any type of sexual relations as described by  
4 you in your court papers that took place  
5 because those allegedly according to her lies  
6 involved some aspect of me.

7 As I was standing outside with her  
8 mother the entire time, her entire story is a  
9 lie. Therefore, to ask me what she did or  
10 didn't do during that time, I can only  
11 testify to what she said about me, which was  
12 1000 percent false.

13 Q. So let's not take the first time,  
14 let's take the next time she comes.

15 A. No no, how can do you that, when  
16 the basis of this entire horrible story that  
17 you have put out is based on this first  
18 appalling story that was written, repeated,  
19 multiply by the press that lied about her  
20 age, lied about the first time she came, lied  
21 about and characterized the entire first  
22 time. I have been so absolutely appalled by  
23 her story and appalled by the entire  
24 characterization of it and I apologize  
25 sincerely for my banging at the table

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1 G Maxwell - Confidential  
2 earlier, I hope you accept my apology. It's  
3 borne out of years of feeling the pressure of  
4 this entire lie that she has perpetrated from  
5 our first time and whilst I recognize that  
6 was -- I hope you forgive me sincerely  
7 because it was just the length of time that  
8 that terrible story has been told and retold  
9 and rehashed when I know it to be 100 percent  
10 false.

11 Q. So not the first time she came, but  
12 the second time she came or the third time or  
13 any time she came, did you ever participate  
14 in a massage with her in Jeffrey Epstein's  
15 room?

16 A. I have never participated at any  
17 time with Virginia in a massage with Jeffrey.

18 Q. Have you ever participated at any  
19 time with Virginia in any kind of sexual  
20 contact or sexual touching with Jeffrey and  
21 Virginia?

22 A. I have not.

23 Q. So we were going through the list  
24 of obvious lies and you were talking about  
25 the first time which I believe we have

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1 G Maxwell - Confidential  
 2 completed but you can add to that if you need  
 3 to.  
 4 What other obvious lies did  
 5 Virginia Roberts tell that you were referring  
 6 to in your statement?  
 7 A. Oh my goodness. Well, I think we  
 8 can totally cover the Clinton story, the  
 9 story that I flew him with Secret Service and  
 10 there was a dinner with other people and that  
 11 entire thing is 100 percent fictitious. I  
 12 have testified for the record and I'm happy  
 13 to do it again, that I have never flown Bill  
 14 Clinton, myself as a pilot in a helicopter at  
 15 any time, anyplace, at any time, to any part  
 16 of the world.  
 17 Q. What other obvious lies were you  
 18 referring to?  
 19 A. She was referring to Al Gore, she  
 20 is referring to a bunch of people. I don't  
 21 believe Al Gore ever came to the island at  
 22 any time ever. I don't even know Al Gore  
 23 actually.  
 24 Q. Just one moment, I want to hear all  
 25 of them, but when you say you don't believe

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1 G Maxwell - Confidential  
 2 Al Gore ever came to the island, do you know  
 3 whether Al Gore ever came to the island?  
 4 A. Al Gore never came to the island.  
 5 Q. How do you know that?  
 6 A. Jeffrey doesn't know him, I don't  
 7 know him and I think had Al Gore -- I don't  
 8 think -- had Al Gore gone to the island  
 9 during the period when I would have been  
 10 involved in organizing a trip, I would have  
 11 been aware of it.  
 12 Q. So go ahead, you had another one.  
 13 A. It would be easier if I could see,  
 14 do you mind if I take a reference at some of  
 15 these newspaper articles or you just want me  
 16 to go from memory.  
 17 Her entire characterization of what  
 18 took place in London at my house with Prince  
 19 Andrew.  
 20 Q. Was it an obvious lie that she was  
 21 at your house in London?  
 22 A. We can't really establish the  
 23 photograph and all that. I don't know if  
 24 that's true, if that's a real picture or not.  
 25 Q. So you dispute that you were

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1 G Maxwell - Confidential  
 2 actually photographed in your town home in  
 3 London --  
 4 A. I don't recognize that picture.  
 5 I'm not sure if that's a real picture or not.  
 6 Q. And have you talked to Prince  
 7 Andrew about that picture?  
 8 A. We discussed Virginia's entire tail  
 9 and he asked me if he even knew her.  
 10 Q. So did Prince Andrew tell you that  
 11 he did not have sex with Virginia Roberts?  
 12 A. He doesn't even know who Virginia  
 13 Roberts is.  
 14 Q. Did he tell you that he didn't have  
 15 sex with her?  
 16 A. It would be difficult to have sex  
 17 with someone you don't know.  
 18 Q. He may not remember her?  
 19 A. I think the inference is he didn't  
 20 know who she was, he didn't have any  
 21 recollection of her whatsoever.  
 22 Q. Has Prince Andrew ever come to your  
 23 London town home?  
 24 A. Yes. Ever being the entire time I  
 25 owned my house, yes.

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1 G Maxwell - Confidential  
 2 Can I go on on her obvious lies?  
 3 Q. If you have more.  
 4 A. I have -- her entire  
 5 characterization -- I took her shopping into  
 6 Burberry and bought her a very expensive  
 7 dress and if this photo were real and if this  
 8 is -- I would never -- the outfit doesn't  
 9 work at all so --  
 10 Q. Do you not remember taking her  
 11 shopping or are you saying it's an obvious  
 12 lie, you know you did not take her shopping?  
 13 A. I did not take her shopping. I did  
 14 not buy her a \$5,000 handbag.  
 15 Q. Did Jeffrey buy her a \$5,000  
 16 handbag?  
 17 A. Her accusation was that I did.  
 18 Q. Do you know if Jeffrey bought her a  
 19 handbag during that trip to London?  
 20 A. I don't know what he did. She  
 21 accused me, I can't physically remember  
 22 buying a \$5,000 not for her, not for anyone,  
 23 not for me.  
 24 Q. Did you ever go shopping with  
 25 Virginia?

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1 G Maxwell - Confidential  
 2 A. I don't recall ever shopping with  
 3 Virginia.  
 4 Q. Did you have more to go over or did  
 5 you want me to ask my questions?  
 6 A. The entire characterization of what  
 7 took place in my house in London would have  
 8 been impossible.  
 9 Q. Can I ask, do you still have it,  
 10 the picture of the London town home with you  
 11 in it, Giuffre 00407.  
 12 As you are looking at this picture,  
 13 Ms. Maxwell, as I'm looking at it it's on the  
 14 right-hand side, there appears to be a  
 15 picture hanging on the wall, do you recall  
 16 that in your London town home?  
 17 A. It's a little difficult to see.  
 18 Q. Do you recall having a picture on  
 19 the wall there by the room where you're  
 20 standing?  
 21 A. I do have a picture.  
 22 Q. Do you recall on the left-hand side  
 23 having a railing that looks like that with  
 24 sort of a bubble wood top?  
 25 A. I do.

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1 G Maxwell - Confidential  
 2 Q. So are you saying that it's an  
 3 obvious lie that Virginia's statement that  
 4 she had sex with Prince Andrew is an obvious  
 5 lie?  
 6 A. What I'm representing is that her  
 7 entire ludicrous and absurd story of what  
 8 took place in my house is an obvious lie.  
 9 Q. Including she had sex with Prince  
 10 Andrew?  
 11 A. She claimed things took place in my  
 12 bathroom in London. Her characterizations is  
 13 just not possible.  
 14 Q. So you're saying it's an obvious  
 15 lie -- that she was telling an obvious lie  
 16 when she said she had sex with Prince Andrew?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation. The witness  
 19 answered the question.  
 20 A. I'm saying within the context of  
 21 all the stories she told, this particular  
 22 story -- back up, she claimed we went out at  
 23 night. I've already testified if -- Prince  
 24 Andrew is such a famous person, if he went to  
 25 a nightclub, it would have been reported by

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1 G Maxwell - Confidential  
 2 the press at that time. She characterized  
 3 that Prince Andrew drank alcohol. Prince  
 4 Andrew tea total.  
 5 She then characterized things took  
 6 place in my bathroom in the bathtub itself.  
 7 The tub is too small for any type of activity  
 8 whatsoever.  
 9 Q. Is Club Tramp the name of a London  
 10 club, is that a club you heard of?  
 11 A. It's not called Club Tramp, it's  
 12 called Tramp.  
 13 Q. That would be a club located in  
 14 London?  
 15 A. Yes.  
 16 Q. Are you saying that it was an  
 17 obvious lie when Virginia said that you made  
 18 her dress up in a school girl outfit?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I already testified that, first of  
 22 all, I don't know what you are taking about,  
 23 I already testified I didn't get her outfits  
 24 and all of that.  
 25 Q. Is it an obvious lie that Virginia

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1 G Maxwell - Confidential  
 2 was paid to go to give a massage to Glenn  
 3 Dubin at the Breakers?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. I cannot testify to what Virginia  
 7 did outside of -- I can't testify to what she  
 8 did, who she gave massages to.  
 9 Q. So you don't know on that one?  
 10 A. Of course I don't know.  
 11 Q. Do you agree that it's  
 12 psychologically harmful to have sex with a  
 13 minor?  
 14 MR. PAGLIUCA: Objection to form  
 15 and foundation.  
 16 A. What are you asking me?  
 17 Q. I'm asking if it is psychologically  
 18 harmful for an adult to have sex with a  
 19 minor?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I don't know what you are asking.  
 23 This has nothing to do with Virginia Roberts.  
 24 Q. It does.  
 25 A. How does it?

<p style="text-align: right;">Page 238</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. I ask the questions, you answer.</p> <p>3 If you can't answer, you can say I don't</p> <p>4 know.</p> <p>5 But my question is, do you agree</p> <p>6 that it's psychologically harmful to have sex</p> <p>7 with a minor?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. Are you giving me a random question</p> <p>11 and as not relates to this case and not</p> <p>12 relates to anything. It's obviously not</p> <p>13 something that you want to have happen.</p> <p>14 Q. Do you agree that Jeffrey Epstein</p> <p>15 has harmed many minors by having sex with</p> <p>16 them?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I can't testify to what Jeffrey did</p> <p>20 or didn't do. I have no knowledge of what</p> <p>21 you are asking me.</p> <p>22 Q. If Jeffrey had sex with minors,</p> <p>23 would you agree that that could harm a minor?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation.</p>	<p style="text-align: right;">Page 240</p> <p>1 G Maxwell - Confidential</p> <p>2 harm.</p> <p>3 MR. PAGLIUCA: Object to the form</p> <p>4 form and foundation.</p> <p>5 A. I would like to say all the</p> <p>6 terrible things Virginia Roberts said about</p> <p>7 me is extremely harmful and you should turn</p> <p>8 that around. All the lies she has said and</p> <p>9 you have backed her on have been extremely</p> <p>10 damaging to me.</p> <p>11 So what I can testify to is that</p> <p>12 somebody who has made these outrageous</p> <p>13 allegations and who is a serious liar and</p> <p>14 that I know for a fact is a liar, that I can</p> <p>15 testify is damaging to me.</p> <p>16 Q. Do you agree that calling a sexual</p> <p>17 abuse victim a liar when she speaks out about</p> <p>18 her abuse can cause psychological harm?</p> <p>19 MR. PAGLIUCA: Are you asking a</p> <p>20 hypothetical question?</p> <p>21 MS. McCAWLEY: Yes.</p> <p>22 A. You are asking me to speculate?</p> <p>23 Q. I'm not asking you to speculate .</p> <p>24 If somebody is a sexual abuse victim --</p> <p>25 A. I can't testify to what some random</p>
<p style="text-align: right;">Page 239</p> <p>1 G Maxwell - Confidential</p> <p>2 A. Again, I am not testifying to what</p> <p>3 Jeffrey did or did not do because I cannot.</p> <p>4 Q. You don't know whether Jeffrey</p> <p>5 Epstein ever had sex with a minor?</p> <p>6 A. Again, I cannot testify to what</p> <p>7 Jeffrey did or didn't do. I cannot.</p> <p>8 Q. You never observed him having sex</p> <p>9 with a minor?</p> <p>10 A. I never observed Jeffrey having sex</p> <p>11 with a minor.</p> <p>12 Q. Do you agree that calling a sex</p> <p>13 abuse victim a liar when she speaks about her</p> <p>14 abuse can cause psychological harm?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. Can you repeat the question.</p> <p>18 Q. Do you agree calling a sex abuse</p> <p>19 victim when she speaks about her abuse can</p> <p>20 cause psychological harm?</p> <p>21 MR. PAGLIUCA: Objection to form</p> <p>22 and foundation.</p> <p>23 A. Say it again.</p> <p>24 Q. Do you agree that calling a sexual</p> <p>25 abuse victim a liar can cause psychological</p>	<p style="text-align: right;">Page 241</p> <p>1 G Maxwell - Confidential</p> <p>2 hypothetical person that you are asking me to</p> <p>3 speculate on their mental state or health</p> <p>4 versus speculative statement. I can't do</p> <p>5 that, that's just not right.</p> <p>6 Q. Do you agree that by calling</p> <p>7 Virginia Roberts a liar when she was subject</p> <p>8 to sexual abuse by Jeffrey Epstein can cause</p> <p>9 psychological harm?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation. Assumes facts not</p> <p>12 in evidence.</p> <p>13 A. I can only tell you about what I</p> <p>14 know of Virginia's lies. She lied</p> <p>15 repeatedly, often and I know for a fact she</p> <p>16 is a liar so I can only testify to what I</p> <p>17 know and the fact that she has lied about me</p> <p>18 from the beginning to the end and repeatedly</p> <p>19 causes me to question anything that she may</p> <p>20 feel.</p> <p>21 Q. Is it an obvious lie you had sex</p> <p>22 toys in Jeffrey Epstein's Palm Beach house?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. Can you repeat the question,</p>



<p style="text-align: right;">Page 242</p> <p>1 G Maxwell - Confidential</p> <p>2 please?</p> <p>3 Q. Is it an obvious lie that you had</p> <p>4 sex toys in Jeffrey Epstein's Palm Beach</p> <p>5 house?</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation.</p> <p>8 A. Did Virginia say that?</p> <p>9 Q. I'm asking you a question.</p> <p>10 Is it an obvious lie that you had</p> <p>11 sex toys in Jeffrey Epstein's house?</p> <p>12 A. I don't recall any sex toys.</p> <p>13 Q. If someone said had you sex toys,</p> <p>14 would that be an obvious lie?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. Like I said -- can you be more</p> <p>18 specific about the house or whatever, what</p> <p>19 exactly you are referring to, what's a sex</p> <p>20 toy?</p> <p>21 Q. Yes. How would you define a sex</p> <p>22 toy?</p> <p>23 A. No. I need you to define a sex</p> <p>24 toy, I don't have enough knowledge of sex</p> <p>25 toys.</p>	<p style="text-align: right;">Page 244</p> <p>1 G Maxwell - Confidential</p> <p>2 I took of people would only have been</p> <p>3 mainstream type magazine type photos and any</p> <p>4 photos I took could have been very happily</p> <p>5 and expected to be displayed on your parents'</p> <p>6 mantel piece or grandparents' mantel piece.</p> <p>7 Q. Is it a lie that you approached</p> <p>8 females to bring them to Jeffrey Epstein?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 A. Please ask the question, again.</p> <p>12 Q. Sure. Is it a lie that you</p> <p>13 approached females to bring them to Jeffrey</p> <p>14 Epstein?</p> <p>15 A. I don't know what you are asking</p> <p>16 me.</p> <p>17 Q. I'm asking you, if it's a lie that</p> <p>18 you approached females to bring them to</p> <p>19 Jeffrey Epstein?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. You are not asking me a good</p> <p>23 question, sorry.</p> <p>24 Q. You don't get to choose the</p> <p>25 questions.</p>
<p style="text-align: right;">Page 243</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. I will define it based on the</p> <p>3 dictionary's definition, which is an object</p> <p>4 or device used to sexually stimulate or</p> <p>5 enhance sexual pleasure.</p> <p>6 A. What's your question, please?</p> <p>7 Q. The question is, is it an obvious</p> <p>8 lie that you had sex toys in Jeffrey</p> <p>9 Epstein's Palm Beach house?</p> <p>10 MR. PAGLIUCA: Same objection.</p> <p>11 Q. You can answer.</p> <p>12 A. Like I said, I do not have any</p> <p>13 recollection of sex toys in Jeffrey's house.</p> <p>14 Q. Is it a lie, is it an obvious lie</p> <p>15 that you took pictures of nude girls?</p> <p>16 MR. PAGLIUCA: Object to the form</p> <p>17 and foundation.</p> <p>18 A. We already covered this. Girls we</p> <p>19 are not referring to -- I can only testify to</p> <p>20 taking pictures of adult people and I already</p> <p>21 testified they are not nude, per se. That</p> <p>22 every picture that I ever took and which they</p> <p>23 were very limited, always by request, the</p> <p>24 people would be covered or it would be a hand</p> <p>25 or a foot. There was never any pictures that</p>	<p style="text-align: right;">Page 245</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I would like to answer your</p> <p>3 questions but you are not asking me a</p> <p>4 question that I can answer.</p> <p>5 Q. What about that is causing you</p> <p>6 pause where you can't answer the question?</p> <p>7 A. You are trying to trap me and</p> <p>8 that's not fair, so I already testified that</p> <p>9 I hire people across the board, so I would</p> <p>10 hire architects, decorators, pool people,</p> <p>11 exercise instructors, gardeners, cooks,</p> <p>12 chefs, cleaning people. So I, in the course</p> <p>13 of a very long time when I would hire people</p> <p>14 I hired people to work for Jeffrey. So I'm</p> <p>15 happy to testify to hiring people for every</p> <p>16 possible conceivable proper job that you</p> <p>17 could conceive of within the context of</p> <p>18 Jeffrey's life and homes.</p> <p>19 Q. Is it a lie that you approached</p> <p>20 females to bring them to Jeffrey Epstein for</p> <p>21 the purpose of performing massages?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. Again, I have already testified</p> <p>25 that part of the job that I had was to hire</p>

<p style="text-align: right;">Page 246</p> <p>1 G Maxwell - Confidential</p> <p>2 lots of different types of people. In terms</p> <p>3 of whatever -- very small part of my job,</p> <p>4 Jeffrey enjoyed getting massages. I think</p> <p>5 that is something we can all agree in this</p> <p>6 room and within the context of that, very</p> <p>7 infrequently I would go to spas and myself</p> <p>8 happily receive a professional nonsexual</p> <p>9 massage from a man and/or from a woman and if</p> <p>10 that massage was something that I thought was</p> <p>11 something that was good, I would ask if that</p> <p>12 man or woman would come back and does home</p> <p>13 visits. If that person said that they did,</p> <p>14 they would sometimes come, from time to time,</p> <p>15 not always, come back to the house to perform</p> <p>16 a nonsexual professional male or female</p> <p>17 massage.</p> <p>18 Q. Were any of the exercise</p> <p>19 instructors you hired under the age of 18?</p> <p>20 A. Again, I don't hire, we've already</p> <p>21 established that I don't hire people. I</p> <p>22 interview people to see if they are competent</p> <p>23 in the job that they do and/or whether they</p> <p>24 are someone who seemed that they can do home</p> <p>25 visits.</p>	<p style="text-align: right;">Page 248</p> <p>1 G Maxwell - Confidential</p> <p>2 of 18?</p> <p>3 A. I think we can establish what adult</p> <p>4 would be.</p> <p>5 Q. You never interviewed or I know you</p> <p>6 don't want to use the word hired, whatever</p> <p>7 your role was, you brought in an exercise</p> <p>8 instructor that was under the age of 18 to</p> <p>9 work at the house?</p> <p>10 MR. PAGLIUCA: Object to the form</p> <p>11 and foundation.</p> <p>12 A. I have already testified that what</p> <p>13 I was responsible for was to find people who</p> <p>14 had competencies in whatever area I was</p> <p>15 looking for. The competencies I was looking</p> <p>16 for were professional and adult.</p> <p>17 Q. So there was no exercise instructor</p> <p>18 that worked at the Palm Beach house or the</p> <p>19 New York house or the New Mexico house or the</p> <p>20 USVI under the age of 18?</p> <p>21 MR. PAGLIUCA: Objection to the</p> <p>22 form and foundation.</p> <p>23 A. I can only testify to when I was at</p> <p>24 the house.</p> <p>25 Q. Yes.</p>
<p style="text-align: right;">Page 247</p> <p>1 G Maxwell - Confidential</p> <p>2 At the point where I think that</p> <p>3 there is somebody that has, can be either</p> <p>4 whatever the job may be, pool, gardener, chef</p> <p>5 and/or exercise instructor and I think they</p> <p>6 could be good at whatever it is at whatever</p> <p>7 skill that they had and they did a home visit</p> <p>8 which would obviously be mandatory and Mr.</p> <p>9 Epstein would meet with them and decide if he</p> <p>10 wanted to have whatever skill it was that he</p> <p>11 would do it and then he would then either</p> <p>12 have them come back or hire them.</p> <p>13 Q. Were there any exercise instructors</p> <p>14 that worked at the home that were under the</p> <p>15 age of 18?</p> <p>16 MR. PAGLIUCA: Objection to the</p> <p>17 form and foundation.</p> <p>18 A. Again, I keep coming back to this,</p> <p>19 that the people that I employed or -- not the</p> <p>20 right word, the people I would meet to come</p> <p>21 and work at the house, under any guise</p> <p>22 whatsoever, again, from any of the many</p> <p>23 positions that I filled, were all over --</p> <p>24 were adults.</p> <p>25 Q. When you say adults, over the age</p>	<p style="text-align: right;">Page 249</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I can only testify to the years</p> <p>3 when I was present.</p> <p>4 Q. Right.</p> <p>5 A. And I can also only testify to</p> <p>6 people I personally either met and/or worked</p> <p>7 with and/or invited, to find the correct</p> <p>8 word, I don't know what the correct word is,</p> <p>9 to come to do exercise or whatever it was at</p> <p>10 the house.</p> <p>11 Of the people that I, male and/or</p> <p>12 female that I brought were all appropriate</p> <p>13 and age appropriate adults.</p> <p>14 Q. Over the age of 18?</p> <p>15 A. We've established them as an adult.</p> <p>16 Q. You are saying appropriate adults,</p> <p>17 so we are clear, you didn't hire or bring in</p> <p>18 or know of any exercise instructors that were</p> <p>19 under the age of 18 at any of those homes?</p> <p>20 A. I am also testifying that when I</p> <p>21 was present at the house and with the people</p> <p>22 that I brought in, were all age appropriate</p> <p>23 adults.</p> <p>24 Q. How do you define age appropriate</p> <p>25 adults, is that over the age of 18, can we</p>

<p style="text-align: right;">Page 250</p> <p>1 G Maxwell - Confidential</p> <p>2 agree to that?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 Q. Are they under the age of 18?</p> <p>6 A. We already established that you can</p> <p>7 be a masseuse in Florida at age 17. That</p> <p>8 does not make it inappropriate.</p> <p>9 A. I'm not saying appropriate or</p> <p>10 inappropriate. I'm just asking if there were</p> <p>11 any exercise instructors that were under the</p> <p>12 age of 18.</p> <p>13 A. I am not aware if anybody was but I</p> <p>14 don't want to full out and say you oh she</p> <p>15 said, we already established you can be a 17</p> <p>16 year old masseuse and have it not be</p> <p>17 something that is not appropriate. So when</p> <p>18 you say that and then you go, well, you come</p> <p>19 back and say something, now we can establish</p> <p>20 that Virginia was 17 but you can be a 17 year</p> <p>21 old legal masseuse, but I am not aware to</p> <p>22 your point.</p> <p>23 Q. Who were the other 17 year old</p> <p>24 masseuses that you were aware of?</p> <p>25 A. I am not aware of any.</p>	<p style="text-align: right;">Page 252</p> <p>1 G Maxwell - Confidential</p> <p>2 Epstein had a sexual preference for underage</p> <p>3 minors?</p> <p>4 MR. PAGLIUCA: Object to the form</p> <p>5 and foundation.</p> <p>6 A. I cannot testify to what</p> <p>7 Jeffrey's --</p> <p>8 Q. You don't know his preference?</p> <p>9 A. You handed me a stack of papers</p> <p>10 from the police reports and that's what I've</p> <p>11 read but I have no knowledge, direct</p> <p>12 knowledge, of what you are referencing.</p> <p>13 Q. So you don't know, you don't know</p> <p>14 in your own mind that Jeffrey Epstein had a</p> <p>15 sexual preference for underage minors, is</p> <p>16 that correct?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 Q. Is that correct?</p> <p>20 A. Please ask the question again.</p> <p>21 Q. You don't know in your own mind</p> <p>22 that Jeffrey Epstein had a sexual preference</p> <p>23 for underage minors?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation. You have to pause,</p>
<p style="text-align: right;">Page 251</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Were there any 16 year year old</p> <p>3 masseuse that you are aware of?</p> <p>4 A. I am not aware.</p> <p>5 Q. Any 15?</p> <p>6 A. I just want to be clear. The only</p> <p>7 person that I am aware of who claims to have</p> <p>8 been a -- we have to -- we established</p> <p>9 Virginia now is 17, given she has changed her</p> <p>10 age so many times. The only person that I am</p> <p>11 aware of that was a masseuse at the time when</p> <p>12 I was present in the house was Virginia.</p> <p>13 Q. Is it an obvious lie that Jeffrey</p> <p>14 Epstein had a sexual preference for underage</p> <p>15 miners?</p> <p>16 MR. PAGLIUCA: Objection to the</p> <p>17 form and foundation.</p> <p>18 A. Can you ask the question again?</p> <p>19 Q. It is it an obvious lie that</p> <p>20 Jeffrey Epstein had a sexual preference for</p> <p>21 underage minors?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. Can you ask the question again?</p> <p>25 Q. Is it an obvious lie that Jeffrey</p>	<p style="text-align: right;">Page 253</p> <p>1 G Maxwell - Confidential</p> <p>2 let me object, answer the question.</p> <p>3 Listen to her question, pause, I object,</p> <p>4 you answer.</p> <p>5 Q. So you don't know in your own mind</p> <p>6 that Jeffrey Epstein had a sexual preference</p> <p>7 for underage minors?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 Q. You can answer.</p> <p>11 A. I cannot tell you what Jeffrey's</p> <p>12 story is. I'm not able to.</p> <p>13 Q. Did Jeffrey Epstein have a scheme</p> <p>14 to recruit underage girls to use them for</p> <p>15 purposes of sexual massages?</p> <p>16 MR. PAGLIUCA: Objection to the</p> <p>17 form and foundation.</p> <p>18 A. Can you ask me again, please?</p> <p>19 Q. Did Jeffrey Epstein have a scheme</p> <p>20 to recruit underage girls to recruit them for</p> <p>21 sexual massages?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. Can you ask it a different way?</p> <p>25 Q. Did Jeffrey Epstein have a scheme</p>

<p style="text-align: right;">Page 254</p> <p>1 G Maxwell - Confidential</p> <p>2 to recruit underage girls for sexual</p> <p>3 massages?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 Q. If you know.</p> <p>7 A. I don't know what you are talking</p> <p>8 about.</p> <p>9 Q. Is it an obvious lie that Virginia</p> <p>10 Giuffre was a minor the first time she was</p> <p>11 taken to Jeffrey Epstein's house?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. So we've already established that</p> <p>15 Virginia was 17 and we have established that</p> <p>16 her mother brought her to the house and that</p> <p>17 she came as a masseuse, age 17, which is</p> <p>18 legal in Florida.</p> <p>19 Q. Would Jeffrey Epstein's assistants</p> <p>20 arrange times for underage girls to come to</p> <p>21 the house for sexual massages?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. What are you talking about?</p> <p>25 Q. Sure. Would Jeffrey Epstein's</p>	<p style="text-align: right;">Page 256</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. During any period of time you</p> <p>3 worked, did you observe that?</p> <p>4 A. I did not observe any such</p> <p>5 photographs.</p> <p>6 Q. Are you aware if they took those</p> <p>7 kinds of photos?</p> <p>8 A. I am not aware.</p> <p>9 MR. PAGLIUCA: Can we take a</p> <p>10 five-minute break.</p> <p>11 THE VIDEOGRAPHER: It's 2:58 and we</p> <p>12 are off the record.</p> <p>13 (Recess.)</p> <p>14 THE VIDEOGRAPHER: It's now 3:10.</p> <p>15 We're starting disk No. 6 and we are</p> <p>16 back on the record.</p> <p>17 Q. Ms. Maxwell, was it an obvious lie</p> <p>18 when Virginia said she was sent to Thailand</p> <p>19 by Epstein in September of 2002?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I have no knowledge of Virginia</p> <p>23 being sent to Thailand.</p> <p>24 But may I say something?</p> <p>25 Q. There is not a question pending</p>
<p style="text-align: right;">Page 255</p> <p>1 G Maxwell - Confidential</p> <p>2 assistants, I think earlier you mentioned, we</p> <p>3 talked about Sarah Kellen who worked in the</p> <p>4 role as an assistant or Nadia Marcinkova.</p> <p>5 Would Jeffrey Epstein's assistants arrange</p> <p>6 times for underage girls to come over the</p> <p>7 house for sexual massages?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. Again, I read the police reports so</p> <p>11 this is all happening according to the police</p> <p>12 reports when I am no longer at the house so I</p> <p>13 can't testify to what Jeffrey's assistants</p> <p>14 did when this kind of activity as alleged in</p> <p>15 the reports.</p> <p>16 Q. So you don't know?</p> <p>17 A. No.</p> <p>18 Q. Would Jeffrey Epstein's assistants,</p> <p>19 meaning Sarah Kellen, Nadia Marcinkova or any</p> <p>20 other assistant that you are aware of from</p> <p>21 the time you worked there take nude</p> <p>22 photographs of underage girls?</p> <p>23 MR. PAGLIUCA: Object to the form</p> <p>24 and foundation.</p> <p>25 A. During what period of time?</p>	<p style="text-align: right;">Page 257</p> <p>1 G Maxwell - Confidential</p> <p>2 unless you want to clarify something.</p> <p>3 Did you want to clarify that?</p> <p>4 A. No, I just wanted to say something.</p> <p>5 Q. Is it an obvious lie when Virginia</p> <p>6 said she was given instructions to maintain</p> <p>7 telephone contact with you while she was in</p> <p>8 Thailand?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 A. Can you repeat the question?</p> <p>12 Q. Is it an obvious lie when Virginia</p> <p>13 said she was given instructions to maintain</p> <p>14 telephone contact with you when she was in</p> <p>15 Thailand?</p> <p>16 MR. PAGLIUCA: Same objection.</p> <p>17 A. I have no idea what instructions</p> <p>18 Virginia was given, if any, when she went to</p> <p>19 Thailand.</p> <p>20 Q. So you know she went to Thailand?</p> <p>21 A. I know she claimed she went to</p> <p>22 Thailand from having read it but given that</p> <p>23 she lied about everything it's hard to know</p> <p>24 what is true and not true.</p> <p>25 Q. Would it make any sense for her to</p>



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 2 be in contact with you, would there be any  
 3 reason why she needed to be in contact with  
 4 you?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. When are we talking about?  
 8 Q. When she went to Thailand.  
 9 MR. PAGLIUCA: Same objection.  
 10 Q. In 2002, would there be any reason  
 11 for her to remain in contact with you?  
 12 MR. PAGLIUCA: Objection to the  
 13 form and foundation.  
 14 A. Can you ask the question again,  
 15 please?  
 16 Q. Would there be any reason for  
 17 Virginia to maintain contact with you in 2002  
 18 when she went to Thailand?  
 19 MR. PAGLIUCA: Same objection.  
 20 A. First of all, I didn't know that  
 21 she went to Thailand. I had had nothing to  
 22 do with her trip to go to Thailand and there  
 23 would absolutely no reason for her to be in  
 24 touch with me, whatsoever.  
 25 Q. Did you ever have a phone number

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 2 that was [REDACTED] ?  
 3 A. I did.  
 4 Q. Was that a cell phone number?  
 5 A. Yes.  
 6 Q. Is that your current cell phone  
 7 number?  
 8 A. Yes.  
 9 Q. I'm going to mark a couple of  
 10 things here?  
 11 (Maxwell Exhibit 11, photos, marked  
 12 for identification.)  
 13 THE WITNESS: Can I say something  
 14 now?  
 15 MR. PAGLIUCA: No.  
 16 THE WITNESS: Will you let me know  
 17 when I can?  
 18 MR. PAGLIUCA: When she asks you a  
 19 question:  
 20 Q. So we've marked this as Exhibit 11.  
 21 I'm showing you what's been marked as Exhibit  
 22 11 which is Giuffre 003191 and 003192.  
 23 Can you take a look at that  
 24 document for me. Is that number that you  
 25 just identified the [REDACTED] as being

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1 G Maxwell - Confidential  
 2 your cell phone number, is that number on  
 3 this document?  
 4 A. It is.  
 5 Q. And do you know who authored this  
 6 document?  
 7 A. I do not.  
 8 Q. Who is JoJo?  
 9 A. I don't know who JoJo is on this  
 10 document because I don't know what this  
 11 document is.  
 12 Q. Do you know someone by the name of  
 13 JoJo?  
 14 A. I do know someone by the name of  
 15 JoJo.  
 16 Q. Would he know your phone number?  
 17 MR. PAGLIUCA: Object to the form.  
 18 A. I have to idea.  
 19 Q. Why would Virginia be instructed to  
 20 call Ms. Maxwell at your number on this form?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I don't know what this document is.  
 24 I don't know when it was done, I don't know  
 25 anything about it other than I can see it has

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 2 my name and my number on it.  
 3 Q. So JoJo -- you said JoJo -- is he  
 4 employed by Mr. Epstein?  
 5 A. Again, it is not the only one JoJo  
 6 on the planet.  
 7 Q. I understand.  
 8 Do you know a JoJo that is employed  
 9 by Mr. Epstein?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. Can you ask me the question again?  
 13 Q. Do you know someone by the name of  
 14 JoJo that was employed by Mr. Epstein back in  
 15 2002?  
 16 A. I do know somebody who was employed  
 17 by Mr. Epstein known as JoJo.  
 18 Q. Do you recognize the other numbers  
 19 listed at the top of this document?  
 20 A. I do not.  
 21 Q. Would you have known JoJo's cell  
 22 number at that time in 2002?  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. I have no idea.

<p style="text-align: right;">Page 262</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Can I ask you to turn to the next</p> <p>3 page, please.</p> <p>4 Do you know who Nantimda Tharanese</p> <p>5 is who is mentioned on this document?</p> <p>6 A. I do not.</p> <p>7 Q. If you look on the bottom lines of</p> <p>8 the document, it says, Still in Thailand</p> <p>9 during your stay, if she is, she will be</p> <p>10 staying at the same hotel.</p> <p>11 Do you recall ever giving Virginia</p> <p>12 instructions to meet a girl in Thailand?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. I have already testified that I</p> <p>16 didn't even know that Virginia was going to</p> <p>17 Thailand.</p> <p>18 Q. So you didn't give her instructions</p> <p>19 to meet a girl in Thailand?</p> <p>20 A. Like I said, I didn't even know she</p> <p>21 was going to Thailand.</p> <p>22 Q. Do you know whether Jeffrey Epstein</p> <p>23 would have given her instructions to meet a</p> <p>24 girl in Thailand?</p> <p>25 MR. PAGLIUCA: Objection to the</p>	<p style="text-align: right;">Page 264</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. The front form, the front page, do</p> <p>3 you recognize this Shopper Travel form, have</p> <p>4 you ever used them as a travel agent with</p> <p>5 Jeffrey Epstein?</p> <p>6 MR. PAGLIUCA: Same objection.</p> <p>7 Q. You can answer.</p> <p>8 A. I don't recognize this.</p> <p>9 Q. Turning to the second page which is</p> <p>10 the 00376, do you see at the top of that</p> <p>11 document where it says Jeffrey Epstein, J.</p> <p>12 Epstein 457 Madison Avenue 4th floor New York</p> <p>13 New York.</p> <p>14 Is that an address you are familiar</p> <p>15 with that is Jeffrey Epstein's?</p> <p>16 A. I am.</p> <p>17 Q. Do you see below that, travel on</p> <p>18 Singapore Airlines, and you are going to have</p> <p>19 to go from New York JFK to Singapore Bangkok.</p> <p>20 Do you see that?</p> <p>21 MR. PAGLIUCA: What?</p> <p>22 Q. The first entry is going to be on</p> <p>23 September 27, New York.</p> <p>24 MR. PAGLIUCA: I see it.</p> <p>25 MS. McCAWLEY: I'm not talking to</p>
<p style="text-align: right;">Page 263</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 A. I cannot possibly tell you what</p> <p>4 Jeffrey did or didn't do. I wouldn't know.</p> <p>5 Q. Do you know whether Jeffrey Epstein</p> <p>6 paid for Virginia to go to Thailand?</p> <p>7 A. Again, I wouldn't know if he did.</p> <p>8 (Maxwell Exhibit 12, documents,</p> <p>9 marked for identification)</p> <p>10 Q. I'm going to direct -- you can take</p> <p>11 a look at it and then I'm going to direct</p> <p>12 your attention to a couple of pages.</p> <p>13 MR. PAGLIUCA: So the record should</p> <p>14 be clear, this exhibit which is 12 is</p> <p>15 375, 6, 7, 8, 9, 80, 1, and then skips</p> <p>16 to 919, 920, 921, 922, 923, 924, 925 and</p> <p>17 926.</p> <p>18 Q. So I'm going to direct your</p> <p>19 attention to the first page, have you ever</p> <p>20 traveled with Jeffrey Epstein where you've</p> <p>21 received a document like this from Shoppers</p> <p>22 Travel in your own independent travel.</p> <p>23 Do you recognize this?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>	<p style="text-align: right;">Page 265</p> <p>1 G Maxwell - Confidential</p> <p>2 you. I'm talking to the witness.</p> <p>3 A. I see it.</p> <p>4 Q. To Singapore Bangkok?</p> <p>5 A. Singapore Bangkok I'm afraid are</p> <p>6 not the same place.</p> <p>7 Q. Singapore, then Bangkok:</p> <p>8 Q. I'm going to turn you to page</p> <p>9 Giuffre, it's a little further back 000919.</p> <p>10 And do you see at the top where it says J.</p> <p>11 Epstein, underneath, Royal Princess, change</p> <p>12 mine?</p> <p>13 A. I do.</p> <p>14 Q. Does this refresh your recollection</p> <p>15 that Virginia Roberts' trip to Thailand was</p> <p>16 paid for by Jeffrey Epstein?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I can only testify to the piece of</p> <p>20 paper you showed me that has that</p> <p>21 information. I cannot testify from direct</p> <p>22 memory.</p> <p>23 Q. When Virginia was traveling to</p> <p>24 Thailand, which the dates, again, I'm going</p> <p>25 to refer you back to the first page so you</p>

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1 G Maxwell - Confidential  
 2 can see the dates.  
 3 MR. PAGLIUCA: Can you identify a  
 4 Bates number, please.  
 5 Q. [REDACTED] which was at the top says,  
 6 [REDACTED] I'm going to refer you,  
 7 at the same time, to the flight logs which  
 8 were marked, the thicker document that looks  
 9 like this with all the log entries on it.  
 10 I'm going to refer you to page --  
 11 MR. PAGLIUCA: That's Exhibit No.  
 12 6, correct? I'm trying to keep the  
 13 record straight.  
 14 MS. McCAWLEY: I don't have Exhibit  
 15 numbers on mine. That's Giuffre [REDACTED]  
 16 MR. PAGLIUCA: Hang on one second.  
 17 A. Can you repeat the number please.  
 18 Q. [REDACTED] And if you will look on  
 19 that page at the entry, under [REDACTED]  
 20 [REDACTED] starting with the [REDACTED] and then it runs  
 21 down to the, looks like the [REDACTED] that first  
 22 entry has President Clinton, Kevin Spacey,  
 23 Chris Tucker, Jeffrey Epstein and the  
 24 initials GM.  
 25 Do you remember taking a trip with

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1 G Maxwell - Confidential  
 2 President Clinton during [REDACTED]  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. Can you repeat the question,  
 6 please?  
 7 Q. Do you remember taking a trip with  
 8 President Clinton during [REDACTED]  
 9 that's the [REDACTED] it looks like, through the  
 10 [REDACTED]  
 11 A. I don't remember the dates. I  
 12 couldn't testify to when we actually did it  
 13 but I do remember the trip itself.  
 14 Q. So you were traveling with Jeffrey  
 15 Epstein and President Clinton at the same  
 16 time Virginia was headed to Thailand, is that  
 17 correct?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I don't know, is that right?  
 21 Q. If you look at [REDACTED] on the  
 22 document that I gave you, the first document  
 23 and then you referred to, if you look in the  
 24 same as above lines, you will see the travel  
 25 group with President Clinton?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Are you asking her  
 3 to compare the documents or are you  
 4 asking her what her personal knowledge  
 5 is.  
 6 MS. McCAWLEY: I'm asking if she can  
 7 look at the doubts and tell me if she  
 8 recalls that she traveling with  
 9 President Clinton at the same time this  
 10 document reflects Virginia was in  
 11 Thailand.  
 12 A. I can't testify to any dates. I  
 13 couldn't tell you. I can see a date and I  
 14 can see a date but I can't tell you that I  
 15 have a memory of the dates. I have a memory  
 16 of the trip, I don't have a memory of the  
 17 time.  
 18 Q. Who is [REDACTED]?  
 19 A. [REDACTED]  
 20 Q. What is her address?  
 21 A. I don't know.  
 22 Q. Does she live in the United States?  
 23 A. She does.  
 24 Q. In what state?  
 25 A. I believe in New Jersey somewhere.

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1 G Maxwell - Confidential  
 2 Q. Do you have her phone number?  
 3 A. Not memorized.  
 4 Q. Do you have the ability to get her  
 5 phone number?  
 6 A. Of course.  
 7 Q. Has she ever asked -- has [REDACTED]  
 8 [REDACTED] ever asked other girls to come over to  
 9 see Jeffrey Epstein for the purpose of a  
 10 sexual massage?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. Can you ask the question again  
 14 please.  
 15 Q. Has [REDACTED] ever asked girls to  
 16 come over to see Jeffrey Epstein for the  
 17 purpose of a sexual massage?  
 18 MR. PAGLIUCA: Object to form and  
 19 foundation.  
 20 A. Can you ask again, please?  
 21 Q. Has [REDACTED] ever asked girls to  
 22 come over to see Jeffrey Epstein for the  
 23 purpose of sexual massage?  
 24 A. I have no personal knowledge.  
 25 Q. What does [REDACTED] do for you?

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1 G Maxwell - Confidential  
 2 A. She helps with my not-for-profit  
 3 ocean foundation and any other related  
 4 activities that I may have.  
 5 Q. Is she paid for by Jeffrey Epstein?  
 6 A. No.  
 7 Q. She is paid for by you?  
 8 A. Yes.  
 9 Q. When did you first meet [REDACTED]  
 10 [REDACTED]  
 11 A. I don't recollect exactly, sometime  
 12 maybe 2002, 2003.  
 13 Q. How did you meet her?  
 14 A. I don't recollect exactly how we  
 15 met.  
 16 Q. Did Jeffrey introduce you to her?  
 17 A. I don't recollect how we met.  
 18 Q. Does she know Jeffrey Epstein?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. Can you ask again, please?  
 22 Q. Does [REDACTED] know Jeffrey  
 23 Epstein?  
 24 A. What do you mean by know?  
 25 Q. Has she met her him before?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I can't recollect a time when  
 5 [REDACTED] -- I've seen [REDACTED] with Jeffrey but --  
 6 Q. You are not sure --  
 7 A. I know they know either other. I  
 8 can't testify to a meeting between them.  
 9 Q. Do you know where in New Jersey she  
 10 lives?  
 11 A. No  
 12 Q. You don't know a city?  
 13 A. No.  
 14 Q. How long has she worked for you?  
 15 A. Sometime 2002, 2003.  
 16 Q. To the present?  
 17 A. Yeah.  
 18 Q. Why do you think that [REDACTED]  
 19 might know Jeffrey?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. Because you know, I know Jeffrey.  
 23 Q. Have you seen them together?  
 24 A. I already testified I have not seen  
 25 them together, to my recollection.

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1 G Maxwell - Confidential  
 2 Q. Is it your testimony that [REDACTED]  
 3 [REDACTED] knows Jeffrey Epstein through the work  
 4 that she does for you?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I don't recollect, and I don't  
 8 recollect how I met [REDACTED] and I can't testify  
 9 to what [REDACTED] relationship is or is not with  
 10 Jeffrey.  
 11 Q. Have you ever talked to Jeffrey  
 12 about [REDACTED]  
 13 A. I don't know what you mean.  
 14 Q. In any way, have you ever had a  
 15 conversation with Jeffrey about [REDACTED]  
 16 A. In what context.  
 17 Q. In any context. Have you ever  
 18 talked to Jeffrey Epstein about [REDACTED]?  
 19 A. [REDACTED] works for me so it's entirely  
 20 possible that in the course of conversations  
 21 since 2002, 2003 that a conversation in which  
 22 [REDACTED] name would have come up is entirely  
 23 possible.  
 24 Q. I provided you with and I'm sorry,  
 25 I don't know all the numbers, but the

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1 G Maxwell - Confidential  
 2 statement that was issued by Ross Gow that  
 3 should be a single page still in your stack  
 4 of exhibits there.  
 5 MR. PAGLIUCA: Exhibit 10.  
 6 Q. Did you authorize Ross Gow to issue  
 7 that statement on your behalf in January of  
 8 2015?  
 9 A. I already testified that that was  
 10 done by my lawyers.  
 11 Q. So did you authorize your lawyers  
 12 to issue a statement on your behalf through  
 13 Ross Gow in January of 2015?  
 14 A. It was determined that I had to  
 15 make a statement in the United Kingdom  
 16 because of the appalling lies and I just  
 17 thought of some new ones.  
 18 Virginia's statement that I  
 19 celebrated her 16 birthday with her. We can  
 20 all agree that that's entirely impossible. I  
 21 didn't meet her until she was 17 and other  
 22 lies she perpetrated that she had a diary and  
 23 we all know is a complete fake. That's not a  
 24 diary. It was just a book she was writing  
 25 that you helped sell to the press, as if it



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1 G Maxwell - Confidential  
 2 was a diary, when it was just a story that  
 3 she is writing of fiction, fictional story  
 4 for money.  
 5 Q. How did you arrive at the words  
 6 that were put in that statement?  
 7 MR. PAGLIUCA: I'm going to object  
 8 and instruct you to the extent this  
 9 calls for any privileged communications  
 10 between yourself and Mr. Barden or  
 11 another lawyer representing you, we're  
 12 asserting privilege. If you can answer  
 13 that without that, feel free to answer.  
 14 Q. So what your counsel is saying, and  
 15 I will exclude any privileged communications  
 16 you had with your lawyers.  
 17 The question is, how did you arrive  
 18 at the words that were put in that statement,  
 19 if you can tell me without disclosing  
 20 privileged communications?  
 21 A. I'm not sure that I can.  
 22 Q. Is the statement that you issued  
 23 true?  
 24 A. What do you mean by that?  
 25 Q. Is the statement that you issued,

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1 G Maxwell - Confidential  
 2 the statement that's in front of you, is it a  
 3 true statement?  
 4 A. As in that Virginia is a liar?  
 5 Q. The words you put in there, is that  
 6 true?  
 7 A. Of course they're true.  
 8 Q. When did you become aware that the  
 9 statement was being released?  
 10 A. I don't recollect exactly.  
 11 Q. What day it was?  
 12 A. No.  
 13 Q. I'm sorry. Did you identify, I  
 14 might not have caught it, did you identify  
 15 the name of the lawyer that you said you  
 16 retained for purposes of this statement?  
 17 A. I think Philip Barden.  
 18 Q. Did you pay that lawyer Philip  
 19 Barden?  
 20 A. Yes.  
 21 Q. Are you aware of any interstate or  
 22 international transportation of a woman aged  
 23 18 to 28 for the purposes of prostitution?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

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1 G Maxwell - Confidential  
 2 A. I'm not sure I even understand your  
 3 question.  
 4 Q. I will go slower.  
 5 Are you aware of any interstate,  
 6 meaning between states, or international,  
 7 meaning oversees transportation, of women  
 8 aged 18 to 28, for the purposes of  
 9 prostitution?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. Are you asking -- I'm still not  
 13 sure I understand the question.  
 14 Q. I will try to make it clearer.  
 15 I'm asking you if you are aware of  
 16 any interstate, meaning between states, or  
 17 international transportation, meaning by  
 18 flight or by car or by train, of women aged  
 19 18 to 28, their ages are between the ages of  
 20 18 and 28, for the purposes of prostitution?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. In the world I'm sure that that  
 24 happens, I read about it all the time.  
 25 Q. Not in the world. Are you aware of

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1 G Maxwell - Confidential  
 2 it, in your experience with Jeffrey Epstein,  
 3 of any interstate or international  
 4 transportation of women aged 18 to 28, for  
 5 the purposes of prostitution?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. So whilst I appreciate this might  
 9 not seem like a smart question, what do you  
 10 mean by prostitution, what are you asking me  
 11 exactly?  
 12 Q. That would be sex for hire, any  
 13 kind of sexual act that's paid for.  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 A. Who's paying, what are you asking  
 17 me.  
 18 Q. It can be paid for by anybody.  
 19 It's a sexual act that's paid for.  
 20 I'm asking if you are aware of any  
 21 interstate or international transportation of  
 22 women aged 18 to 28, for the purposes of  
 23 prostitution?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

<p style="text-align: right;">Page 278</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I have no idea what you are talking</p> <p>3 about.</p> <p>4 Q. So you are not aware of that?</p> <p>5 A. No.</p> <p>6 Q. Are you aware of any interstate or</p> <p>7 international transportation of women, aged</p> <p>8 18 to 28, for the purposes of having sex with</p> <p>9 Epstein where they would receive compensation</p> <p>10 of any type?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. I don't know what you are referring</p> <p>14 to.</p> <p>15 Q. Do you want me to repeat the</p> <p>16 question?</p> <p>17 A. Sure, go ahead.</p> <p>18 Q. Are you aware of any interstate or</p> <p>19 international transportation of woman, aged</p> <p>20 18 to 28, for the purpose of having sex with</p> <p>21 Jeffrey Epstein where they would receive</p> <p>22 compensation of any type?</p> <p>23 MR. PAGLIUCA: Objection to form</p> <p>24 and foundation.</p> <p>25 A. I am not aware of what you are</p>	<p style="text-align: right;">Page 280</p> <p>1 G Maxwell - Confidential</p> <p>2 Epstein?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. Again, I'm not aware of anybody</p> <p>6 that, if you are asking for specifics to</p> <p>7 someone else, I have no knowledge of that.</p> <p>8 Q. So you are not aware of any</p> <p>9 interstate or international transportation of</p> <p>10 a woman aged 18 to 28 for the purposes of</p> <p>11 providing a massage to any person other than</p> <p>12 Jeffrey Epstein?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. I don't recall what any single</p> <p>16 person being on a plane for a massage with</p> <p>17 someone else other than Jeffrey, for the sole</p> <p>18 purpose, if that's the question, I don't have</p> <p>19 any recollection of that.</p> <p>20 Q. Earlier in your testimony, you</p> <p>21 stated that Virginia Roberts was 17 at the</p> <p>22 time you met her.</p> <p>23 How do you know she was 17?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation. And to the extent</p>
<p style="text-align: right;">Page 279</p> <p>1 G Maxwell - Confidential</p> <p>2 talking about.</p> <p>3 Q. Are you aware of any interstate or</p> <p>4 international transportation of women, aged</p> <p>5 18 to 28, for the purposes of providing a</p> <p>6 massage for Jeffrey Epstein?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. So I you need to repeat that</p> <p>10 question for me.</p> <p>11 Q. Sure.</p> <p>12 Are you aware of any interstate,</p> <p>13 meaning between states, or international,</p> <p>14 oversees, transportation of women, aged 18 to</p> <p>15 28, for the purposes of providing massage for</p> <p>16 Jeffrey Epstein?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I think we can agree he did travel</p> <p>20 from time to time with a professional adult</p> <p>21 masseuse.</p> <p>22 Q. Are you aware of any interstate or</p> <p>23 international transportation of women, aged</p> <p>24 18 to 28, for the purposes of providing a</p> <p>25 massage to any person other than Jeffrey</p>	<p style="text-align: right;">Page 281</p> <p>1 G Maxwell - Confidential</p> <p>2 that calls for a privileged response,</p> <p>3 I'm instructing you not to answer.</p> <p>4 Q. How do you know Virginia Roberts</p> <p>5 was 17 at the time you met her?</p> <p>6 MR. PAGLIUCA: Again, if you</p> <p>7 learned that information from your</p> <p>8 lawyer, I'm instructing you not to</p> <p>9 answer.</p> <p>10 A. I will follow my counsel's advice.</p> <p>11 Q. Are you able to answer that</p> <p>12 question without telling me information you</p> <p>13 learned from a lawyer?</p> <p>14 A. I'm not.</p> <p>15 Q. So you don't have independent</p> <p>16 knowledge that Virginia, according to your</p> <p>17 statement, was 17 at the time you met her?</p> <p>18 A. Again, my lawyer has instructed me</p> <p>19 not to answer.</p> <p>20 Q. I'm asking you a different</p> <p>21 question. Whether you have any independent</p> <p>22 knowledge, outside your lawyers, that</p> <p>23 Virginia was 17 at the time you met her?</p> <p>24 A. Following the instructions of my</p> <p>25 lawyers, I can only remember or testify to</p>

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1 G Maxwell - Confidential  
2 what she --  
3 MR. PAGLIUCA: She is asking you a  
4 different question. She is asking other  
5 than what your lawyers have told you, do  
6 you have any knowledge about her being  
7 17, that's what she is asking.  
8 A. I can't recollect where I got all  
9 the information that I have that definitively  
10 shows that.  
11 Q. Earlier in your testimony, I  
12 believe you said all of us would know that  
13 Virginia was 17 at the time you met her.  
14 How would we know that?  
15 A. I think you know that by her own  
16 dates, now that it was in 2000, so her entire  
17 tail of me celebrating her 16th birthday is  
18 clearly another giant falsehood.  
19 Q. But she was 16 and 17 that year,  
20 wasn't she?  
21 A. Which year?  
22 Q. You said it was 2000.  
23 A. I think the information that I have  
24 that indicates that definitively was  
25 something that is privileged, so I can't

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1 G Maxwell - Confidential  
2 share with you.  
3 Q. So you have privileged information  
4 that definitively tells you that she was 17  
5 at the time you met her?  
6 A. I believe I do.  
7 Q. How would we know that?  
8 A. What are you asking me?  
9 Q. Earlier today you testified that we  
10 would know that she was 17 at the time that  
11 you met her.  
12 How would we know that?  
13 A. I imagine you have access to  
14 exactly the same information that I do.  
15 Q. What is that information?  
16 A. Again, it's privileged, I can't  
17 share it with you but you have been on this  
18 case for, I don't know, much much longer than  
19 I have and I imagine you have all the  
20 information that I do.  
21 Q. Do you know whether your lawyers  
22 have produced documents from you that would  
23 show the age that Virginia was at the time  
24 that you met her?  
25 MR. PAGLIUCA: To the extent that

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1 G Maxwell - Confidential  
2 calls for a communication that you had  
3 with one of your lawyers, I'm  
4 instructing you not to answer that  
5 question.  
6 Q. I assume you, as part of the  
7 discovery process, had to collect documents  
8 that were relevant to this action, is that  
9 correct?  
10 A. I did.  
11 Q. Did you collect documents that  
12 would show that Virginia was 17 at the time  
13 that you met her?  
14 A. I think you have everything that  
15 relates, that I had, contemporaneously per  
16 what you asked for that I have that relates  
17 to that.  
18 Q. Did you have a document that  
19 identified that Virginia was 17 at the time  
20 that you met her?  
21 A. You have all of the documents that  
22 I had.  
23 Q. I'm not asking what documents. I'm  
24 asking, do you have a document that  
25 identifies Virginia being 17 at the time you

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1 G Maxwell - Confidential  
2 met her?  
3 A. You have every document that I  
4 have. You have seen every document that I  
5 have.  
6 Q. That's not what I'm asking.  
7 A. I don't recall every document that  
8 I gave you, so I don't know. I would have to  
9 look at every single document I gave you and  
10 then review it but as I recall you have every  
11 document that I have.  
12 Q. What are you planning to show the  
13 jury that will prove that Virginia was 17  
14 when you met her?  
15 A. Again that's privileged so I can't  
16 share that with you.  
17 Q. If you're showing the jury, it  
18 wouldn't be privileged, so is there a  
19 document you have produced in this matter  
20 that shows that Virginia was 17 at the time  
21 you met her?  
22 MR. PAGLIUCA: She answered that  
23 question already. She said she doesn't  
24 know, she has given you everything. If  
25 there is a decision -- assuming for the

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1 G Maxwell - Confidential  
 2 moment there is such a document, just  
 3 hypothetically, and assuming for the  
 4 moment that it is going to get produced  
 5 somewhere, if it hasn't already been  
 6 produced, obviously that would involve a  
 7 waiver, a future waiver of the  
 8 privilege. I think that's the answer to  
 9 the question.  
 10 Q. Has the document been produced, do  
 11 you know?  
 12 A. You have everything that I have  
 13 given you, so if you can't -- if it's not in  
 14 those documents, I don't know what to tell  
 15 you.  
 16 Q. Your lawyers haven't withheld any  
 17 documents?  
 18 A. They are right here. You can ask  
 19 them.  
 20 Q. I'm asking you.  
 21 A. I don't know what -- they're  
 22 lawyers.  
 23 Q. When we were talking earlier about  
 24 Prince Andrew, I asked you whether you had  
 25 ever given him a gift of a puppet.

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1 G Maxwell - Confidential  
 2 Did you ever, not as a gift, did  
 3 you ever see in the presence of Prince Andrew  
 4 a puppet?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. Can you be more direct, please?  
 8 Q. Sure. Were you ever in a room with  
 9 Prince Andrew where there was a puppet?  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 A. Can you be more specific please and  
 13 can you bound it by time and be more  
 14 specific, whatever you are actually asking  
 15 me?  
 16 Q. Were you ever in a room with Prince  
 17 Andrew in New York in Jeffrey Epstein's home  
 18 where there was a puppet?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. What sort of puppet are you asking  
 22 me?  
 23 Q. Any kind of puppet?  
 24 A. You need to be more descriptive. I  
 25 don't know what you mean by puppet, there is

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1 G Maxwell - Confidential  
 2 hand puppets, all sorts of puppets.  
 3 Q. Is there any puppet you've ever  
 4 seen in Jeffrey Epstein's home in the  
 5 presence of Prince Andrew?  
 6 A. Again, puppet, you know, there is  
 7 lots of types of puppets.  
 8 Q. Any type of puppet.  
 9 A. If you want to give me a  
 10 description of the puppet, I would be perhaps  
 11 be able to say.  
 12 Q. Any type of puppet?  
 13 A. Can you be more detailed?  
 14 Q. Have you ever seen a puppet in  
 15 Jeffrey Epstein's home in the presence of  
 16 Prince Andrew?  
 17 A. My understanding of a puppet is a  
 18 small handheld item you have in a circus. I  
 19 have never seen that.  
 20 Q. Have you ever seen a puppet which  
 21 is defined as a movable model of a person or  
 22 animal that is used in entertainment and  
 23 typically moved either by strings or  
 24 controlled from above or by a hand inside it?  
 25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I have not seen a puppet that fits  
 4 exactly that description.  
 5 Q. Have you seen any puppet that fits  
 6 any description?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. Can you reask the question, please?  
 10 Q. Yes.  
 11 Have you seen any puppet that fits  
 12 any description in the presence of Prince  
 13 Andrew in Jeffrey Epstein's home?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 A. I am not aware of any small  
 17 handheld puppet that was there. There was a  
 18 puppet -- not a puppet -- there was a -- I  
 19 don't know how would you describe it really,  
 20 I don't know how would you describe it. Not  
 21 a puppet, I don't know how you would describe  
 22 it. A caricature of Prince Andrew that was  
 23 in Jeffrey's home.  
 24 Q. Did you use that caricature to put  
 25 the hand of the caricature on Johanna



<p style="text-align: right;">Page 290</p> <p>1 G Maxwell - Confidential</p> <p>2 Sjoberg's breast?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. I don't recollect. I recollect the</p> <p>6 puppet but I don't recollect anything around</p> <p>7 the puppet. You characterized puppet, I</p> <p>8 characterize it as, I don't know, as a</p> <p>9 characterization of Andrew.</p> <p>10 Q. Do you recollect asking Virginia</p> <p>11 Roberts to sit on Prince Andrew's lap with</p> <p>12 the caricature of Prince Andrew?</p> <p>13 A. I do not recollect that.</p> <p>14 Q. What do you remember about the</p> <p>15 caricature of the Prince Andrew caricature</p> <p>16 when you were in the presence of Prince</p> <p>17 Andrew, Virginia Roberts and Johanna Sjoberg?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 A. I don't recollect the story as told</p> <p>21 by Johanna or Virginia. I don't even know</p> <p>22 who -- I remember the caricature of Prince</p> <p>23 Andrew and I remember Prince Andrew but I</p> <p>24 don't recall anything else around the</p> <p>25 caricature.</p>	<p style="text-align: right;">Page 292</p> <p>1 G Maxwell - Confidential</p> <p>2 recollect this caricature, you recollect</p> <p>3 Prince Andrew being there. Do you recollect</p> <p>4 a party going on at the time of that</p> <p>5 interaction with Prince Andrew and the</p> <p>6 caricature?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. I don't recollect a party -- first</p> <p>10 of all, they weren't really parties -- I</p> <p>11 don't recollect a party -- I don't know what</p> <p>12 you mean by party in the context of that</p> <p>13 scenario.</p> <p>14 Q. Who do you recollect being at the</p> <p>15 home during the time Prince Andrew was there</p> <p>16 with this caricature?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I only recollect myself with Prince</p> <p>20 Andrew, I don't recollect anybody else.</p> <p>21 Q. You don't recollect Jeffrey Epstein</p> <p>22 being there?</p> <p>23 A. Actually, no.</p> <p>24 Q. You don't recollect Johanna Sjoberg</p> <p>25 being there?</p>
<p style="text-align: right;">Page 291</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Did you give it to him?</p> <p>3 A. I did not.</p> <p>4 Q. Who gave it to him?</p> <p>5 A. I don't think it was given to him</p> <p>6 at all.</p> <p>7 Q. Did he bring it?</p> <p>8 A. No.</p> <p>9 Q. Was it something that was at the</p> <p>10 house?</p> <p>11 A. As best I recollect.</p> <p>12 Q. Was it something that you saw at</p> <p>13 the house in advance of Prince Andrew's</p> <p>14 arrival?</p> <p>15 A. Again, I don't real -- I recollect</p> <p>16 the caricature, I recollect Prince Andrew, I</p> <p>17 don't recollect much else around the</p> <p>18 caricature.</p> <p>19 Q. Was there a party going on in the</p> <p>20 house at the time you recollect the</p> <p>21 caricature?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. You have to be way more specific?</p> <p>25 Q. Do you remember, you said you</p>	<p style="text-align: right;">Page 293</p> <p>1 G Maxwell - Confidential</p> <p>2 A. No.</p> <p>3 Q. You don't recollect Virginia</p> <p>4 Roberts being there?</p> <p>5 A. No.</p> <p>6 Q. It was just you and Prince Andrew?</p> <p>7 A. I am not saying it was just me and</p> <p>8 Prince Andrew, you are asking me do you</p> <p>9 remember. I only remember Prince Andrew, I</p> <p>10 remember Prince Andrew and the caricature but</p> <p>11 I can't place the caricature and everybody</p> <p>12 else in the same context, the same timeframe</p> <p>13 you are asking me.</p> <p>14 Q. Would Prince Andrew typically</p> <p>15 travel with Secret Service or some sort of</p> <p>16 security when he would come to visit you and</p> <p>17 Jeffrey in New York?</p> <p>18 A. Typically he would have somebody.</p> <p>19 Q. Would they be in the house or</p> <p>20 outside of the house? Would they usually</p> <p>21 stay in the house or outside of the house, in</p> <p>22 other words guarding the doors or would they</p> <p>23 come inside?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>

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<p>1 G Maxwell - Confidential</p> <p>2 A. Typically, there is no typical</p> <p>3 because there is no standard procedure, so I</p> <p>4 can't comment or testify to what secret</p> <p>5 service would or wouldn't do.</p> <p>6 Q. Do you remember them being in the</p> <p>7 house?</p> <p>8 A. Not specifically.</p> <p>9 Do you mind if I take a bathroom</p> <p>10 break.</p> <p>11 THE VIDEOGRAPHER: It's now 3:51</p> <p>12 and we are off the record.</p> <p>13 (Recess.)</p> <p>14 THE VIDEOGRAPHER: It's now 4:04.</p> <p>15 We are back on the record and we're</p> <p>16 starting disk No. 7.</p> <p>17 Q. Ms. Maxwell, during what time</p> <p>18 period, I know you said, I believe you said</p> <p>19 you met Jeffrey in 1991, if I'm correct there</p> <p>20 and you've known him through the present.</p> <p>21 During what time period within</p> <p>22 those years would you say your relationship</p> <p>23 was the closest with Jeffrey?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>	<p>1 G Maxwell - Confidential</p> <p>2 all -- sometime last year.</p> <p>3 Q. So you haven't talked to him like,</p> <p>4 for example, last week you didn't talk to</p> <p>5 him?</p> <p>6 A. I did not.</p> <p>7 Q. How many times have you had either</p> <p>8 direct or indirect, meaning, in the presence</p> <p>9 of him or calling or emailing, contact with</p> <p>10 Jeffrey Epstein from December 30, 2014 until</p> <p>11 now?</p> <p>12 A. I'm sorry, can you just --</p> <p>13 Q. Either in person or by phone or by</p> <p>14 email, from December 30, 2014 until present.</p> <p>15 A. I can't really characterize that</p> <p>16 but not very much. There was a period when</p> <p>17 in January when you filed your, whatever you</p> <p>18 filed, where we spoke and then, since then</p> <p>19 not much at all.</p> <p>20 Q. Can you estimate how many emails</p> <p>21 you would have sent Jeffrey from the period</p> <p>22 of December 30, 2014 to the present?</p> <p>23 A. Not very many at all.</p> <p>24 Q. More than 20?</p> <p>25 A. I really wouldn't be able to</p>
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<p>1 G Maxwell - Confidential</p> <p>2 A. What do you mean by close, sorry.</p> <p>3 Q. I think earlier today you testified</p> <p>4 that at some point in time you considered</p> <p>5 yourself to be his girlfriend, is that the</p> <p>6 closest you would say that your relationship</p> <p>7 was with him and if so, what time period was</p> <p>8 that?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 A. I don't think I said I was his</p> <p>12 girlfriend, I would like to think of myself</p> <p>13 as maybe, I don't think I -- sometime in the</p> <p>14 mid '90s.</p> <p>15 Q. How close was your relationship?</p> <p>16 A. We were very friendly.</p> <p>17 Q. Without going into details, was</p> <p>18 your relationship with him intimate?</p> <p>19 A. Yes.</p> <p>20 Q. When was the last time you had</p> <p>21 contact with Jeffrey Epstein?</p> <p>22 A. What do you mean by contact.</p> <p>23 Q. Either a phone call or email or</p> <p>24 anything of that nature?</p> <p>25 A. As best as I can recollect when</p>	<p>1 G Maxwell - Confidential</p> <p>2 characterize it because it wouldn't be that</p> <p>3 many. I wouldn't know.</p> <p>4 Q. More than 50?</p> <p>5 A. It would be on the lesser side, not</p> <p>6 on the more side.</p> <p>7 Q. Can you give me a number?</p> <p>8 A. I honestly couldn't. I would be</p> <p>9 guessing.</p> <p>10 Q. How many emails has Jeffrey sent</p> <p>11 you from the period December 30, 2014 to the</p> <p>12 present?</p> <p>13 A. I would say less emails, even less</p> <p>14 emails than I sent him.</p> <p>15 Q. More than 20?</p> <p>16 A. I would say on the lesser side.</p> <p>17 Q. Less meaning 10?</p> <p>18 A. I really can't recall, very little.</p> <p>19 Q. When you spoke with Jeffrey in</p> <p>20 January of 2015, what did he say to you?</p> <p>21 A. I really couldn't remember exactly</p> <p>22 what he said to me.</p> <p>23 Q. Did you talk about Virginia</p> <p>24 Roberts?</p> <p>25 A. I'm sure we did but I couldn't</p>

<p style="text-align: right;">Page 298</p> <p>1 G Maxwell - Confidential</p> <p>2 recall the exact conversation.</p> <p>3 Q. Does Jeffrey Epstein send you text</p> <p>4 messages?</p> <p>5 A. No.</p> <p>6 Q. Do you send him text messages?</p> <p>7 A. No.</p> <p>8 Q. How many phone calls have you had</p> <p>9 with Jeffrey Epstein since December 30, 2014?</p> <p>10 A. Again, very few.</p> <p>11 Q. More than five?</p> <p>12 A. Probably as many as the few emails</p> <p>13 that I would characterize, so just very few.</p> <p>14 I mean a small number.</p> <p>15 Q. Are you aware of any disagreement</p> <p>16 between your views about Virginia Roberts and</p> <p>17 Jeffrey's views about Virginia Roberts?</p> <p>18 MR. PAGLIUCA: Object to the form</p> <p>19 and foundation</p> <p>20 A. I cannot speculate to his views. I</p> <p>21 can only testify on my views.</p> <p>22 Q. Earlier you went through the series</p> <p>23 of lies. Have you talked to Jeffrey about</p> <p>24 the lies and does he agree with you?</p> <p>25 A. I have discussed some of the issues</p>	<p style="text-align: right;">Page 300</p> <p>1 G Maxwell - Confidential</p> <p>2 deny whether he had sex with Virginia</p> <p>3 Roberts?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 A. I can't say what Jeffrey would say.</p> <p>7 Q. Has he discussed that with you?</p> <p>8 A. He has not.</p> <p>9 Q. Would Jeffrey be able to confirm or</p> <p>10 deny whether he had a sexual massage from</p> <p>11 Virginia that first time she came to his</p> <p>12 mansion in Palm Beach?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. I cannot speak for what he would</p> <p>16 say. I can only speak for what I would say.</p> <p>17 So as I testified everything that she said</p> <p>18 about that first meeting didn't happen so...</p> <p>19 Q. Has he told that you everything</p> <p>20 about that first meeting didn't happen?</p> <p>21 A. I know it didn't happen because she</p> <p>22 put me in that room.</p> <p>23 Q. I understand you know. But has</p> <p>24 Jeffrey said when you are talking about the</p> <p>25 obvious lies, oh yeah, that never happened?</p>
<p style="text-align: right;">Page 299</p> <p>1 G Maxwell - Confidential</p> <p>2 with him, I can't remember specifically which</p> <p>3 ones. I just don't recall. I'm sorry.</p> <p>4 Q. Do you recall him telling you that</p> <p>5 he didn't agree with you on any of those?</p> <p>6 A. I don't recall him saying that.</p> <p>7 Q. Do you have a joint defense</p> <p>8 agreement with Jeffrey Epstein?</p> <p>9 A. I believe I do.</p> <p>10 Q. Do you have a joint defense</p> <p>11 agreement with Alan Dershowitz?</p> <p>12 A. I don't believe I do.</p> <p>13 Q. Earlier today in your testimony,</p> <p>14 when I was asking you some questions, you</p> <p>15 said that you couldn't answer but that</p> <p>16 Jeffrey Epstein could answer that question.</p> <p>17 Would Jeffrey Epstein be in a</p> <p>18 position to confirm or deny some of the</p> <p>19 obvious lies that we've discussed today?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I can't possibly testify to what</p> <p>23 Jeffrey could or would say. I can't speak</p> <p>24 for him.</p> <p>25 Q. Would Jeffrey be able to confirm or</p>	<p style="text-align: right;">Page 301</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to the</p> <p>3 form and foundation.</p> <p>4 A. I can't specifically recall that.</p> <p>5 I don't know, but he has to agree with me</p> <p>6 because it didn't happen.</p> <p>7 Q. Can Jeffrey Epstein, would he be</p> <p>8 able to confirm or deny whether he had sex</p> <p>9 with underage girls?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation.</p> <p>12 A. I can't testify to what Jeffrey</p> <p>13 would say.</p> <p>14 Q. Can Jeffrey confirm or deny whether</p> <p>15 Bill Clinton was on Jeffrey's island?</p> <p>16 MR. PAGLIUCA: Objection to the</p> <p>17 form and foundation.</p> <p>18 A. I can't say what Jeffrey would say.</p> <p>19 I can only say what I know to be true.</p> <p>20 Q. Has Jeffrey talked to you about the</p> <p>21 fact whether Bill Clinton was on his island?</p> <p>22 A. As best as I can recollect, he said</p> <p>23 he was not on the island. As best as I can</p> <p>24 recollect.</p> <p>25 Q. Can Jeffrey Epstein confirm whether</p>

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1 G Maxwell - Confidential  
2 he and Virginia Roberts were together in the  
3 presence of Prince Andrew?

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

6 A. I can't speak to what Jeffrey would  
7 say.

8 Q. Has he talked to about Virginia  
9 Roberts' statement that she was in the  
10 presence of Prince Andrew?

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

13 A. I have not discussed individual  
14 presences with Virginia. That's not -- I'm  
15 only concerned with what I know to be the  
16 stuff about me. So my focus has always been  
17 the lies and the obvious lies as something I  
18 can personally attest to. I cannot possibly  
19 talk for anything else.

20 Q. Has Jeffrey Epstein said to you  
21 anything along the lines of Virginia is lying  
22 when she says she met Prince Andrew?

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

25 A. Again, I'm not talking about what

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1 G Maxwell - Confidential  
2 she says as regards to other people. I can  
3 talk to things as regards to me.

4 Q. I'm asking if Jeffrey ever said  
5 that to you?

6 A. I don't recollect specific  
7 conversations along those things.

8 Q. You don't recollect him saying that  
9 to you?

10 A. I don't recollect him saying to me  
11 that Virginia didn't meet Prince Andrew. I'm  
12 sure that wouldn't be a conversation that we  
13 would have. It doesn't effect me whether --  
14 so I'm really only concerned about the lies  
15 that were told as regards to me.

16 Q. Can Jeffrey Epstein confirm or deny  
17 whether you sent Virginia to give Glenn Dubin  
18 a massage?

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

21 A. I can't say what Jeffrey would say,  
22 I can tell you I didn't. I can't tell you  
23 what anybody else.

24 Q. Have you discussed with him  
25 Virginia's allegation that she gave Glenn

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1 G Maxwell - Confidential  
2 Dubin a massage?

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

5 A. I didn't know that she did say  
6 that.

7 Q. Do you know whether Jeffrey Epstein  
8 has ever sent anybody to Glenn Dubin to  
9 perform a massage for him?

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

12 A. I couldn't possibly recollect  
13 whether he did anything like that.

14 Q. Did you ever send anybody, not  
15 Virginia, anybody else over to Glenn Dubin's  
16 home for a massage?

17 A. Not to the best of my knowledge.

18 Q. Do you know one of Alexander  
19 Dixon's friend by the name of Anuska  
20 DiGeorgio?

21 A. I do recollect a person of that  
22 name.

23 Q. How do you know her?

24 A. I don't recollect.

25 Q. Did you meet her through Jeffrey?

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1 G Maxwell - Confidential

2 A. I don't recollect.

3 Q. Do you recall when you met her?

4 A. I do not recollect.

5 Q. How many times have you seen Anuska  
6 DiGeorgio in your life?

7 A. The only reason I remember is  
8 because it's an unusual name but I couldn't  
9 tell you anything else.

10 Q. You didn't see her on a regular  
11 basis, she wasn't one of your friends?

12 A. No.

13 Q. Was Anuska DiGeorgio a masseuse?

14 A. Not to my knowledge.

15 Q. Do you have knowledge of whether  
16 she had a sexual relationship with Jeffrey  
17 Epstein?

18 A. I have no knowledge of that.

19 Q. When was the last time you spoke  
20 with her?

21 A. A very long -- I have no idea.

22 Q. Would it be years?

23 A. Yes.

24 Q. What do you remember about Anuska  
25 DiGeorgio?



<p style="text-align: right;">Page 306</p> <p>1 G Maxwell - Confidential</p> <p>2 A. Nothing really.</p> <p>3 Q. Do you remember what she looks</p> <p>4 like?</p> <p>5 A. I would just be speculating on how</p> <p>6 I remember. I couldn't describe her.</p> <p>7 Q. Do you recall traveling with her?</p> <p>8 A. I don't.</p> <p>9 Q. Did you ever go to her home?</p> <p>10 A. I don't believe I did.</p> <p>11 Q. Do you know where she lives?</p> <p>12 A. I don't.</p> <p>13 Q. Would you have met her through</p> <p>14 Jeffrey Epstein?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. I already testified I don't</p> <p>18 recollect how I met her and I remember her</p> <p>19 because her name is very unusual.</p> <p>20 Q. So what's your -- what recollection</p> <p>21 do you have of her, do you have a specific</p> <p>22 recollection of meeting her somewhere, you</p> <p>23 just don't know when that was or how do you</p> <p>24 know that name Anuska DiGeorgio?</p> <p>25 MR. PAGLIUCA: Objection to the</p>	<p style="text-align: right;">Page 308</p> <p>1 G Maxwell - Confidential</p> <p>2 massages from her.</p> <p>3 Q. Did you ever have any sexual</p> <p>4 interaction with her?</p> <p>5 MR. PAGLIUCA: Object to the form</p> <p>6 and foundation and I'm going to instruct</p> <p>7 you if we're talking about any</p> <p>8 consensual adult contact, you are not</p> <p>9 allowed to answer the question.</p> <p>10 Q. Did you have any sexual contact</p> <p>11 with her in the presence of Jeffrey Epstein?</p> <p>12 MR. PAGLIUCA: Same instruction.</p> <p>13 Q. Did you have any sexual contact</p> <p>14 with her in the presence of anybody other</p> <p>15 than Jeffrey Epstein?</p> <p>16 MR. PAGLIUCA: Same instruction.</p> <p>17 Q. How many massages did you receive</p> <p>18 from Johanna?</p> <p>19 A. I really don't recall but a fair</p> <p>20 amount.</p> <p>21 Q. Did the massages involve sex?</p> <p>22 MR. PAGLIUCA: I'm going to</p> <p>23 instruct you not to answer.</p> <p>24 Q. Have you ever engaged in sex with</p> <p>25 any female?</p>
<p style="text-align: right;">Page 307</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 A. I don't know why the name is -- I'm</p> <p>4 sorry -- I can't -- I have no idea. I</p> <p>5 recognize the name but that's it.</p> <p>6 Q. Was Johanna Sjoberg a masseuse?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. What are you asking me, I'm sorry?</p> <p>10 Q. When Johanna Sjoberg worked for</p> <p>11 Jeffrey Epstein, did she perform massages?</p> <p>12 A. I've testified that when Johanna</p> <p>13 came originally, she came to answer</p> <p>14 telephones. I believe at some point she</p> <p>15 became a masseuse. I don't recollect when</p> <p>16 and I personally had massages from Johanna.</p> <p>17 Q. What did Johanna do for Jeffrey</p> <p>18 Epstein, did she perform massages, anything</p> <p>19 else?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. When she came she answered phones</p> <p>23 and at some point, I believe, I don't have</p> <p>24 any firm recollection, but I believe she went</p> <p>25 to school and became a masseuse and I had</p>	<p style="text-align: right;">Page 309</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: I'm going to</p> <p>3 instruct you not to answer.</p> <p>4 MS. McCAWLEY: I want the record to</p> <p>5 reflect that Ms. Maxwell's attorney is</p> <p>6 directing her not to answer this series</p> <p>7 of questions.</p> <p>8 MR. PAGLIUCA: It definitely does.</p> <p>9 Q. Were you responsible for</p> <p>10 introducing Anuska to Jeffrey Epstein?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. I already testified that I don't</p> <p>14 really recall Anuska.</p> <p>15 Q. Were you responsible for</p> <p>16 introducing Johanna to Jeffrey Epstein?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. Again, I don't like the</p> <p>20 characterization of introduction. Johanna</p> <p>21 came to answer telephones.</p> <p>22 Q. When did you -- were you the person</p> <p>23 who brought or introduced or met Johanna for</p> <p>24 purposes of bringing her to Jeffrey Epstein's</p> <p>25 home?</p>

<p style="text-align: right;">Page 310</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to the</p> <p>3 form and foundation.</p> <p>4 A. That's not how I would characterize</p> <p>5 that.</p> <p>6 Q. How would you characterize it?</p> <p>7 A. I have testified that I'm</p> <p>8 responsible for finding professional people</p> <p>9 to work in the homes, age appropriate adult</p> <p>10 people, so from pool attendants, to</p> <p>11 gardeners, to chefs, to housekeepers, to</p> <p>12 butlers, to chauffeurs and one of the</p> <p>13 functions was to be able to answer the</p> <p>14 telephones and in the context of finding</p> <p>15 someone to answer the telephones, I did look</p> <p>16 to try to find appropriate people to answer</p> <p>17 the phones.</p> <p>18 Q. So did you find Johanna for</p> <p>19 purposes of that role?</p> <p>20 A. So in the course of looking for</p> <p>21 somebody to answer phones at the house,</p> <p>22 Johanna was one of the people who said that</p> <p>23 she was willing to answer phones.</p> <p>24 Q. Did you approach her at her school</p> <p>25 campus?</p>	<p style="text-align: right;">Page 312</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Would you visit more than one</p> <p>3 university to try to find individuals to work</p> <p>4 for Jeffrey Epstein?</p> <p>5 A. As I recollect, I think that's, in</p> <p>6 fact, the only university I went to.</p> <p>7 Q. Did you go there more than once?</p> <p>8 A. I think I went twice.</p> <p>9 Q. Who else did you find from that</p> <p>10 university, was there anybody other than</p> <p>11 Johanna?</p> <p>12 A. I don't recollect, I'm sorry.</p> <p>13 Q. We are going to mark this as</p> <p>14 Maxwell 13?</p> <p>15 (Maxwell Exhibit 13, documents,</p> <p>16 marked for identification.)</p> <p>17 Q. Can you take a look at the document</p> <p>18 I put in front of you, please.</p> <p>19 Are you familiar with this</p> <p>20 document?</p> <p>21 A. I'm familiar with this actual</p> <p>22 document.</p> <p>23 Q. How was this document created?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>
<p style="text-align: right;">Page 311</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to form</p> <p>3 and foundation.</p> <p>4 A. I honestly don't recall how, in</p> <p>5 that moment, how I met Johanna and how she</p> <p>6 came to get the job but...</p> <p>7 Q. Did you typically, in your work for</p> <p>8 Jeffrey Epstein, would you typically go to</p> <p>9 school campuses to try to find individuals to</p> <p>10 work for Jeffrey Epstein?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. I never -- what do you mean by</p> <p>14 school? Let's characterize school.</p> <p>15 Q. Any kind of school.</p> <p>16 A. Obviously not. I never went to any</p> <p>17 school with young people. Johanna, I believe</p> <p>18 came from an adult university, as I would</p> <p>19 know in England, so university, I went there</p> <p>20 but I never went, as I best recollect,</p> <p>21 anywhere else.</p> <p>22 Q. Did you -- what university was it</p> <p>23 that you went to?</p> <p>24 A. I don't recall the university that</p> <p>25 she went to right now.</p>	<p style="text-align: right;">Page 313</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I don't know how this document was</p> <p>3 created.</p> <p>4 Q. You were involved in the creation</p> <p>5 of this document?</p> <p>6 A. I think you can see from the date</p> <p>7 that it's 2004, 2005, so no.</p> <p>8 Q. You weren't involved in the</p> <p>9 creation of this document.</p> <p>10 Did you -- we talked earlier about</p> <p>11 Mr. Epstein's house, I'm talking about the</p> <p>12 Palm Beach house where you said there was a</p> <p>13 computer on the desk, that employees had</p> <p>14 access to -- people who worked for Jeffrey</p> <p>15 Epstein may have had access to?</p> <p>16 A. I think anybody could have had</p> <p>17 access to that.</p> <p>18 Q. Was that computer used, if you know</p> <p>19 to keep a log of addresses and phone contact</p> <p>20 information for Jeffrey Epstein?</p> <p>21 A. Are we talking about when this</p> <p>22 document was created.</p> <p>23 Q. In general, was there, on that</p> <p>24 computer during the time that you were</p> <p>25 present with Jeffrey Epstein, was there a</p>

<p style="text-align: right;">Page 314</p> <p>1 G Maxwell - Confidential</p> <p>2 mechanism by which you kept electronic</p> <p>3 information of names and addresses of</p> <p>4 individuals that he knew?</p> <p>5 MR. PAGLIUCA: Objection to the</p> <p>6 form and foundation.</p> <p>7 A. I can't testify to what was on that</p> <p>8 computer or not after I was gone.</p> <p>9 Q. Not when you were gone, when you</p> <p>10 were there. If Jeffrey wanted to call, for</p> <p>11 example, say Les Wexner, would someone be</p> <p>12 able to go to that computer to pull up the</p> <p>13 address information and phone contact</p> <p>14 information for that individual?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. I couldn't possibly say.</p> <p>18 Q. Did you ever have to keep track of</p> <p>19 address or phone contact information for</p> <p>20 Jeffrey Epstein?</p> <p>21 A. That was not my job.</p> <p>22 Q. Did you ever do it?</p> <p>23 A. I am not responsible for keeping</p> <p>24 his numbers so that wasn't my job at all.</p> <p>25 Q. But did you ever do it? I know</p>	<p style="text-align: right;">Page 316</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 Q. Was there a hard copy book as well</p> <p>4 as something on the computer or was there</p> <p>5 only electronic information on the phone</p> <p>6 numbers?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. I can only testify to what I know</p> <p>10 obviously, and I believe that this is a copy</p> <p>11 of a stolen document. I would love to know</p> <p>12 how you guys got it.</p> <p>13 Q. I'm asking during the time you</p> <p>14 worked for Jeffrey Epstein, was there a</p> <p>15 hardcopy document of any kind that kept phone</p> <p>16 numbers for Jeffrey Epstein, if he needed to</p> <p>17 contact someone?</p> <p>18 A. The stolen document I have in front</p> <p>19 of me that you have is what you are referring</p> <p>20 to.</p> <p>21 Q. So there was, during your time when</p> <p>22 you were there, there was no other, you</p> <p>23 mentioned there was information on a</p> <p>24 computer. Was there any hardcopy document</p> <p>25 that you could refer to to find someone's</p>
<p style="text-align: right;">Page 315</p> <p>1 G Maxwell - Confidential</p> <p>2 it's not your job but did you ever do it, did</p> <p>3 you ever keep phone contact information for</p> <p>4 him?</p> <p>5 A. During the course of the time we</p> <p>6 were together, if he gave me a telephone</p> <p>7 number, I would give it to an assistant to</p> <p>8 put in the computer, I could do that.</p> <p>9 Q. Would he ask you for contact</p> <p>10 information for different individuals, if he</p> <p>11 wanted to contact someone?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. In the course of the long period of</p> <p>15 time when I was there, it certainly would be</p> <p>16 possible for him to ask me for a telephone</p> <p>17 number and if I had the -- I wouldn't always</p> <p>18 have it -- I'm sure it happened.</p> <p>19 Q. Was there a hardcopy book in</p> <p>20 addition to the computer, a hardcopy book</p> <p>21 that you could look for numbers that were</p> <p>22 relevant to Jeffrey Epstein's life and</p> <p>23 something on the computer or was it just an</p> <p>24 electronic version?</p> <p>25 MR. PAGLIUCA: Objection to the</p>	<p style="text-align: right;">Page 317</p> <p>1 G Maxwell - Confidential</p> <p>2 number?</p> <p>3 A. You have the stolen document in</p> <p>4 front of you.</p> <p>5 Q. You had access to this when you</p> <p>6 worked for Jeffrey Epstein?</p> <p>7 A. This is, I believe, the book that</p> <p>8 was stolen, that was the hardcopy of whatever</p> <p>9 was there.</p> <p>10 Q. So when you were working for</p> <p>11 Jeffrey Epstein, you were able to access this</p> <p>12 book?</p> <p>13 A. This book -- if this is what this</p> <p>14 is, I believe it was, this is the stolen</p> <p>15 document from his house.</p> <p>16 Q. And you were able to access it when</p> <p>17 you worked for him?</p> <p>18 A. It was a document that was printed</p> <p>19 that you could, if you needed to, look for a</p> <p>20 number.</p> <p>21 Q. Do you know how this book was</p> <p>22 created?</p> <p>23 A. No.</p> <p>24 Q. When you referred to it a moment</p> <p>25 ago, to a stolen document, when Alfredo</p>

<p style="text-align: right;">Page 318</p> <p>1 G Maxwell - Confidential</p> <p>2 Rodriguez turned this document over to the</p> <p>3 FBI, are you aware he described it as a</p> <p>4 document that came from your computer?</p> <p>5 MR. PAGLIUCA: Objection to the</p> <p>6 form and foundation.</p> <p>7 A. I have no idea what he said or</p> <p>8 didn't say, so if you want me to reference</p> <p>9 something he said, you need to show it to me.</p> <p>10 Q. Did you keep this document, an</p> <p>11 electronic copy of it, on your personal</p> <p>12 computer?</p> <p>13 A. I don't recollect.</p> <p>14 Q. If you had to update something, for</p> <p>15 example, if there was a new number, a new</p> <p>16 individual that Jeffrey had hired that you</p> <p>17 were going to track, would you input that</p> <p>18 information into this document on your</p> <p>19 computer?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I've already testified that I'm not</p> <p>23 responsible for updating and keeping these</p> <p>24 records.</p> <p>25 Q. Did you have this document on your</p>	<p style="text-align: right;">Page 320</p> <p>1 G Maxwell - Confidential</p> <p>2 2004, 2005, so, no.</p> <p>3 Q. But I'm sorry, correct me if I'm</p> <p>4 misunderstanding your testimony, I thought</p> <p>5 you said when you were working with Jeffrey,</p> <p>6 that this document existed and it was</p> <p>7 something you utilized?</p> <p>8 A. I can't possibly tell you what</p> <p>9 numbers were added or not added subsequent to</p> <p>10 my departure.</p> <p>11 Q. So you can't recall if you added</p> <p>12 any of these numbers?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation, mischaracterizes</p> <p>15 the witness' testimony.</p> <p>16 Q. Are there any numbers on here or</p> <p>17 names that you recognize that you would have</p> <p>18 entered into this section?</p> <p>19 A. I already testified that I'm not</p> <p>20 responsible for inputting numbers and names</p> <p>21 into this so I would not be able to tell you.</p> <p>22 Q. Are there any names or numbers</p> <p>23 under this section, Massage Florida, that you</p> <p>24 would have provided to an assistant to input</p> <p>25 into this document?</p>
<p style="text-align: right;">Page 319</p> <p>1 G Maxwell - Confidential</p> <p>2 computer, your personal computer?</p> <p>3 A. I told you, I don't recollect</p> <p>4 having this document on my computer.</p> <p>5 Q. Do you know what computers this</p> <p>6 document was on, if more than one?</p> <p>7 A. I'm sorry, this is a long time ago</p> <p>8 and I don't recall exactly how this was all</p> <p>9 managed.</p> <p>10 Q. If you didn't create this document,</p> <p>11 do you know who did?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. I don't.</p> <p>15 Q. I'm going to direct your attention</p> <p>16 to part of this document. It's towards the</p> <p>17 back, it's going to be page 91 and it has</p> <p>18 bates label Giuffre 001663. I'm going to</p> <p>19 direct your attention to the section that</p> <p>20 says, Massage Florida.</p> <p>21 Did you input any of the names or</p> <p>22 numbers under that section?</p> <p>23 MR. PAGLIUCA: Objection to form</p> <p>24 and foundation.</p> <p>25 A. So this document is produced in</p>	<p style="text-align: right;">Page 321</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I can't possibly say.</p> <p>3 Q. Do you see under Massage Florida,</p> <p>4 about halfway down the first column, do you</p> <p>5 see a number that says Johanna's cell?</p> <p>6 MR. PAGLIUCA: What page?</p> <p>7 Q. It's 91, Bates number 001663.</p> <p>8 About halfway down, it says in the first</p> <p>9 column, it says Johanna's cell.</p> <p>10 Do you see that?</p> <p>11 A. I do.</p> <p>12 Q. Would you have provided after, I</p> <p>13 know you didn't hire her, Jeffrey hired her</p> <p>14 but after you brought her to Jeffrey, would</p> <p>15 you have given her cell phone number to an</p> <p>16 assistant to input into this document?</p> <p>17 MR. PAGLIUCA: Objection to form</p> <p>18 and foundation.</p> <p>19 A. I didn't bring her to Jeffrey, the</p> <p>20 way you characterize and I would have no</p> <p>21 knowledge of how this number ended up in this</p> <p>22 book.</p> <p>23 Q. I believe you, and I will try to</p> <p>24 use your words so we are clear, you met</p> <p>25 Johanna, is that correct?</p>



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<p>1 G Maxwell - Confidential</p> <p>2 A. Yes.</p> <p>3 Q. And then she began working for</p> <p>4 Jeffrey?</p> <p>5 A. Yes.</p> <p>6 Q. Would you have provided whomever</p> <p>7 was in charge of keeping this updated with</p> <p>8 Johanna's cell number so you would be able to</p> <p>9 contact her if needed?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation.</p> <p>12 A. I don't know. It could have been a</p> <p>13 number of different ways, it it could have</p> <p>14 been Jeffrey who gave it to somebody.</p> <p>15 Q. You just don't remember doing that?</p> <p>16 A. I do not.</p> <p>17 Q. Now, as you look -- I want you to</p> <p>18 take a look at the Florida massage list, it's</p> <p>19 three columns there.</p> <p>20 Do you, as you look at those names</p> <p>21 on the various columns, do you know the ages</p> <p>22 of any of the girls in this list?</p> <p>23 A. I don't know. One, I don't know</p> <p>24 who all the people are on this list and I</p> <p>25 certainly don't know the ages.</p>	<p>1 G Maxwell - Confidential</p> <p>2 number of masseuses listed under the Florida</p> <p>3 massage section?</p> <p>4 A. When I was there, I would have, of</p> <p>5 course there would have been some masseuses</p> <p>6 listed but I could not tell you who or how</p> <p>7 many and this -- I could not possibly because</p> <p>8 I wouldn't remember.</p> <p>9 Q. Do you know why Jeffrey would have</p> <p>10 had so many names listed under his massage</p> <p>11 Florida?</p> <p>12 MR. PAGLIUCA: Objection to form</p> <p>13 and foundation.</p> <p>14 A. I can't testify to why Jeffrey has</p> <p>15 so many.</p> <p>16 Q. Did he use a different masseuse</p> <p>17 every day?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 Q. You can answer.</p> <p>21 A. When I was there he had a massage</p> <p>22 roughly every day, one masseuse, and mostly</p> <p>23 he would have them at random times, so it</p> <p>24 would be difficult if you just only had one</p> <p>25 person, man, woman, for an adult massage, to</p>
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<p>1 G Maxwell - Confidential</p> <p>2 Q. Do you know what their</p> <p>3 qualifications are?</p> <p>4 A. I don't know who the people are in</p> <p>5 general so of course I don't know what their</p> <p>6 qualifications are.</p> <p>7 Q. Do you know why Jeffrey has so many</p> <p>8 masseuses listed in Florida in his book here?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 A. Again, this book was created post</p> <p>12 my departure, so I couldn't explain why all</p> <p>13 these people were here.</p> <p>14 Q. When you were there, you said this</p> <p>15 book existed?</p> <p>16 A. Yes.</p> <p>17 Q. So when you were there, were there</p> <p>18 a number of masseuses listed under the</p> <p>19 Florida massage?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation and</p> <p>22 mischaracterization of the witness'</p> <p>23 testimony.</p> <p>24 Q. I'm asking you a question.</p> <p>25 When you were there, were there a</p>	<p>1 G Maxwell - Confidential</p> <p>2 come and be available for whatever time it</p> <p>3 was. So he would have more than one person</p> <p>4 that he could call for a massage because at</p> <p>5 any given time the one that he called first</p> <p>6 may not have been available.</p> <p>7 Q. So would it typically be a</p> <p>8 different person each day that would give him</p> <p>9 a massage?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation.</p> <p>12 A. It would be, when I was there,</p> <p>13 based on availability.</p> <p>14 Q. Would it surprise you to learn that</p> <p>15 the Federal Government found that some of the</p> <p>16 girls on this list under massage Florida were</p> <p>17 under the age of 18?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 A. I can't testify to what the</p> <p>21 government found or did not find because I</p> <p>22 would have no knowledge of it.</p> <p>23 Q. I'm asking if you would be</p> <p>24 surprised by that?</p> <p>25 MR. PAGLIUCA: Form and foundation.</p>

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<p>1 G Maxwell - Confidential</p> <p>2 A. I have knowledge of it. I can't</p> <p>3 speculate.</p> <p>4 Q. On the second column, towards the</p> <p>5 bottom, there is the name, it's one up from</p> <p>6 the bottom, there is the name Gwendolyn Beck,</p> <p>7 do you know Gwendolyn Beck?</p> <p>8 A. I do.</p> <p>9 Q. Who is she?</p> <p>10 A. She was a friend of Jeffrey's.</p> <p>11 Q. Is she a masseuse?</p> <p>12 A. She, I don't think she was a</p> <p>13 masseuse, no.</p> <p>14 Q. Why would be she listed under</p> <p>15 Florida massages?</p> <p>16 A. An input error.</p> <p>17 Q. Is this list any individual that</p> <p>18 would have sex with Jeffrey?</p> <p>19 MR. PAGLIUCA: Objection to the</p> <p>20 form and foundation.</p> <p>21 A. I wouldn't have any knowledge of</p> <p>22 that.</p> <p>23 Q. Do you know if Jeffrey had sex with</p> <p>24 Gwendolyn Beck?</p> <p>25 MR. PAGLIUCA: Object to the form</p>	<p>1 G Maxwell - Confidential</p> <p>2 around. I can't testify to that.</p> <p>3 Q. Were you around in 2004, 2005?</p> <p>4 A. I already testified that I was</p> <p>5 there when Jeffrey's mother passed away and</p> <p>6 so you know, I did visit for her passing and</p> <p>7 I believe I was there for a couple of days in</p> <p>8 2005.</p> <p>9 Q. So if an employee of Mr. Epstein in</p> <p>10 2004 said that you were the employee's direct</p> <p>11 supervisor, would that be incorrect?</p> <p>12 MR. PAGLIUCA: Objection to form</p> <p>13 and foundation.</p> <p>14 A. What employee, what's the</p> <p>15 circumstances and what is the story, I don't</p> <p>16 know what you are asking me.</p> <p>17 Q. If Alfredo Rodriguez said in 2004</p> <p>18 when he was hired, you were his direct</p> <p>19 supervisor, would that be true?</p> <p>20 A. No.</p> <p>21 Q. Were you in 2004 supervising Sarah</p> <p>22 Kellen?</p> <p>23 MR. PAGLIUCA: Objection to form</p> <p>24 and foundation.</p> <p>25 A. I never supervised Sarah Kellen.</p>
Page 327	Page 329
<p>1 G Maxwell - Confidential</p> <p>2 and foundation.</p> <p>3 A. First of all, I wouldn't have any</p> <p>4 knowledge of that.</p> <p>5 MS. McCAWLEY: We are going to take</p> <p>6 a quick break.</p> <p>7 THE VIDEOGRAPHER: It's now 4:39</p> <p>8 and we are off the record.</p> <p>9 (Recess.)</p> <p>10 THE VIDEOGRAPHER: It's now 4:54</p> <p>11 and we are as back on the record</p> <p>12 starting disk number 8.</p> <p>13 Q. Ms. Maxwell, we were talking</p> <p>14 earlier about the journal and I believe you</p> <p>15 said in 2004, 2005, you were no longer</p> <p>16 working and responsible for that journal, is</p> <p>17 that correct?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 A. What are we referring to, this</p> <p>21 document right here?</p> <p>22 Q. Yes.</p> <p>23 A. I don't know who is the author of</p> <p>24 this or I can't tell you what is in here</p> <p>25 versus what would have been here when I was</p>	<p>1 G Maxwell - Confidential</p> <p>2 Q. Did Sarah Kellen take orders from</p> <p>3 you?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 A. She worked for Jeffrey.</p> <p>7 Q. If Alfredo Rodriguez said you had</p> <p>8 knowledge of underage girls coming to</p> <p>9 Jeffrey's home for the purpose of sex, would</p> <p>10 you contend that that is truthful?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation of the question.</p> <p>13 A. I have no idea what you are talking</p> <p>14 about, I'm sorry.</p> <p>15 Q. If Alfredo Rodriguez said that you</p> <p>16 have knowledge of underage girls coming to</p> <p>17 Jeffrey's home for the purpose of having</p> <p>18 massages involving sex, would you say that</p> <p>19 that statement is truthful?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I can't testify to what Alfredo</p> <p>23 said or didn't say.</p> <p>24 Q. I'm saying if Alfredo said that you</p> <p>25 had knowledge that there were girls coming</p>

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<p>1 G Maxwell - Confidential</p> <p>2 over to the house that were underage for the</p> <p>3 purposes of sex, would that statement be</p> <p>4 true?</p> <p>5 MR. PAGLIUCA: Objection to form</p> <p>6 and foundation.</p> <p>7 A. I can't testify to what Alfredo</p> <p>8 said or didn't say or what he thought.</p> <p>9 Q. Did you have knowledge of underage</p> <p>10 girls coming to Jeffrey Epstein's house for</p> <p>11 the purpose of sex?</p> <p>12 A. No.</p> <p>13 Q. Earlier I believe you testified,</p> <p>14 correct me if I'm wrong, that the document</p> <p>15 that is in front of you, the thicker document</p> <p>16 was a stolen document.</p> <p>17 Do you know who stole that</p> <p>18 document?</p> <p>19 A. I have read that Alfredo stole the</p> <p>20 document.</p> <p>21 Q. And where have you read that?</p> <p>22 A. I believe it was reported in the</p> <p>23 press.</p> <p>24 Q. Earlier we were talking about the</p> <p>25 computers at Jeffrey Epstein's home. Did you</p>	<p>1 G Maxwell - Confidential</p> <p>2 of this document being on it, so I don't know</p> <p>3 where this came from.</p> <p>4 Q. I understand the computer at the</p> <p>5 house that you're referencing. On a personal</p> <p>6 computer of yours, did you have that</p> <p>7 document?</p> <p>8 A. I don't know where this document</p> <p>9 came from, so I can't possibly say this</p> <p>10 document was on any computer that I may have</p> <p>11 had access to.</p> <p>12 Q. On a personal computer of your own,</p> <p>13 did you have lists of the phone numbers and</p> <p>14 contact information relating to Jeffrey</p> <p>15 Epstein?</p> <p>16 A. Like everybody, I have an address</p> <p>17 book but I can't possibly testify to where</p> <p>18 this thing came from.</p> <p>19 Q. Was it your address book or was it</p> <p>20 addresses that related to Jeffrey Epstein?</p> <p>21 MR. PAGLIUCA: Objection to the</p> <p>22 form and foundation.</p> <p>23 A. I don't know what you're asking me.</p> <p>24 Q. On your personal computer, the</p> <p>25 address book you are referencing, was it your</p>
Page 331	Page 333
<p>1 G Maxwell - Confidential</p> <p>2 have a computer that was your computer</p> <p>3 located in Jeffrey Epstein's home?</p> <p>4 MR. PAGLIUCA: Objection to form</p> <p>5 and foundation.</p> <p>6 A. I've testified to the computer</p> <p>7 already. Even when I was around, there was a</p> <p>8 computer that people had access to.</p> <p>9 Q. So is Alfredo Rodriguez telling the</p> <p>10 truth when he says that he downloaded that</p> <p>11 book from your computer?</p> <p>12 MR. PAGLIUCA: Objection to the</p> <p>13 form and foundation.</p> <p>14 A. I couldn't possibly tell you what</p> <p>15 Alfredo did or didn't do or said or didn't</p> <p>16 say.</p> <p>17 Q. Was it on your computer?</p> <p>18 A. I already testified I have no idea</p> <p>19 where this document came from.</p> <p>20 Q. Did you have a list of names of</p> <p>21 individuals with contact information for</p> <p>22 Jeffrey Epstein on your personal computer?</p> <p>23 A. Again, that wasn't my computer. I</p> <p>24 already said that was a computer that lots of</p> <p>25 people would have, so I have no recollection</p>	<p>1 G Maxwell - Confidential</p> <p>2 address book with individuals you knew or was</p> <p>3 it an address book for your employer, Jeffrey</p> <p>4 Epstein?</p> <p>5 A. Jeffrey has his situation and I</p> <p>6 have no -- this is Jeffrey's, it came from</p> <p>7 his home, so I can't testify to anything</p> <p>8 about this in that period of time.</p> <p>9 Q. So you didn't have on your computer</p> <p>10 a list of contact information for individuals</p> <p>11 that was related to Jeffrey Epstein?</p> <p>12 A. I don't recall exactly what I had</p> <p>13 back in 2004 and 2005, so I can't say what I</p> <p>14 had back then that relates to his addresses,</p> <p>15 I can't recall.</p> <p>16 Q. So is it possible that someone</p> <p>17 could have downloaded from your personal</p> <p>18 computer a list of names and address that</p> <p>19 were affiliated with Jeffrey Epstein?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. This didn't come from any computer</p> <p>23 of mine.</p> <p>24 Q. But is it possible that someone</p> <p>25 could have downloaded a list of names and</p>

<p style="text-align: right;">Page 334</p> <p>1 G Maxwell - Confidential</p> <p>2 addresses affiliated with Jeffrey Epstein</p> <p>3 from your computer?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 A. I already said, I didn't have a</p> <p>7 computer there, so I don't know where this</p> <p>8 came from, I have no idea.</p> <p>9 Q. I'm going to read to you some</p> <p>10 testimony from Alfredo Rodriguez's deposition</p> <p>11 and it's on page 370 and I want to ask you a</p> <p>12 question about it, if it's true or false?</p> <p>13 MR. PAGLIUCA: I'm going to object</p> <p>14 unless you show the witness the</p> <p>15 document.</p> <p>16 MS. McCAWLEY: I will pass it. We</p> <p>17 are not going to mark it. We will skip</p> <p>18 it.</p> <p>19 Q. Did you ever tell Alfredo Rodriguez</p> <p>20 that he better watch out and better keep his</p> <p>21 mouth shut with respect to what occurred at</p> <p>22 Mr. Epstein's home?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. It doesn't sound like anything I</p>	<p style="text-align: right;">Page 336</p> <p>1 G Maxwell - Confidential</p> <p>2 reference to this case with any, anything you</p> <p>3 just mentioned, I never threatened anyone.</p> <p>4 Q. Have you ever directed anyone to</p> <p>5 call any witnesses relevant to this case and</p> <p>6 threaten them not to testify?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. I never done such a thing.</p> <p>10 Q. Did Jeffrey Epstein or you ever ask</p> <p>11 any female, regardless of age, to carry</p> <p>12 Jeffrey's baby for him?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 Q. Or anything along those lines?</p> <p>16 MR. PAGLIUCA: Objection to the</p> <p>17 form and foundation.</p> <p>18 A. Can you repeat the question,</p> <p>19 please?</p> <p>20 Q. Did you or Jeffrey Epstein ever ask</p> <p>21 any female, regardless of age, to carry</p> <p>22 Jeffrey Epstein's baby for him?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. Are you asking --</p>
<p style="text-align: right;">Page 335</p> <p>1 G Maxwell - Confidential</p> <p>2 would say.</p> <p>3 Q. Did you ever threaten Alfredo</p> <p>4 Rodriguez in any way if he were to disclose</p> <p>5 information he learned from his employment</p> <p>6 with Jeffrey Epstein?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. I'm happy to answer. No, I never</p> <p>10 threatened him in any way.</p> <p>11 Q. Were you concerned that he was</p> <p>12 going to disclose that Jeffrey Epstein was</p> <p>13 trafficking underage girls?</p> <p>14 MR. PAGLIUCA: Objection to the</p> <p>15 form and foundation.</p> <p>16 A. First of all, there are so many</p> <p>17 things wrong with that question, but I have</p> <p>18 no knowledge of what you are talking about.</p> <p>19 Q. Have you ever contacted or</p> <p>20 instructed anyone to contact any witness in</p> <p>21 this case for the purposes of threatening</p> <p>22 them not to testify in this case?</p> <p>23 MR. PAGLIUCA: Objection to the</p> <p>24 form and foundation.</p> <p>25 A. I have never called anybody with</p>	<p style="text-align: right;">Page 337</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. To become pregnant, did you or</p> <p>3 Jeffrey Epstein ever ask any female to become</p> <p>4 pregnant and carry Jeffrey Epstein's baby for</p> <p>5 you or for Jeffrey?</p> <p>6 MR. PAGLIUCA: Objection to form</p> <p>7 and foundation.</p> <p>8 A. You need to be very specific. I</p> <p>9 have no idea what you are talking about.</p> <p>10 That's completely rubbish.</p> <p>11 Q. Did you or Jeffrey Epstein ask any</p> <p>12 female to become pregnant and carry his baby</p> <p>13 for either him or you?</p> <p>14 MR. PAGLIUCA: Objection to the</p> <p>15 form and foundation. Go ahead.</p> <p>16 A. I can't testify to anything Jeffrey</p> <p>17 did or didn't do when I am not present, but I</p> <p>18 have never asked anybody to carry a baby for</p> <p>19 me.</p> <p>20 Q. Or anything along those lines?</p> <p>21 MR. PAGLIUCA: Object to the form</p> <p>22 and foundation.</p> <p>23 Q. I want to make sure we are talking</p> <p>24 about the same thing, not physically carry a</p> <p>25 baby, I mean become pregnant with a baby?</p>



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1 G Maxwell - Confidential  
2 MR. PAGLIUCA: Objection to the  
3 form and foundation.  
4 Q. I want to make sure we are clear.  
5 A. I don't know what you are asking.  
6 Q. That's why I want to make sure we  
7 are clear.  
8 A. We are clear. I never asked  
9 anybody to carry a baby for me.  
10 Q. Do you know if Jeffrey ever asked  
11 anybody to carry a baby for him?  
12 A. I'm not going to characterize any  
13 conversation Jeffrey had with somebody else.  
14 Q. You are not aware of that, is that  
15 your testimony?  
16 A. I am testifying I never have and I  
17 will not testify for anything for Jeffrey.  
18 Q. Did you ever hear Jeffrey ask  
19 anybody to carry a baby for him?  
20 A. I don't recollect conversation  
21 about Jeffrey and babies in any form.  
22 Q. Did Jeffrey ever tell he wanted to  
23 have a baby?  
24 A. I don't recollect baby  
25 conversations with Jeffrey.

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1 G Maxwell - Confidential  
2 Q. So he never told you he wanted to  
3 have a baby?  
4 A. I don't recollect any baby  
5 conversations with him saying he wanted to  
6 have a baby.  
7 Q. Did you ever bring any females to  
8 the Dubin's house that were not your friends'  
9 children that were under the age of 18?  
10 MR. PAGLIUCA: Objection to form  
11 and foundation.  
12 A. I have never, to my knowledge,  
13 brought anybody under the age of 18 that's  
14 not a friend of my family or my nieces or  
15 nephews to the Dubin household.  
16 Q. Earlier today you testified, I  
17 believe, that with respect to your town home  
18 Jeffrey paid for some of that and then gave  
19 you a loan, is that correct?  
20 MR. PAGLIUCA: Objection to the  
21 form and foundation.  
22 A. I said, actually I think it was a  
23 loan, I believe it was a loan.  
24 Q. The whole thing?  
25 A. As best as I can recollect.

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1 G Maxwell - Confidential  
2 Q. Did you pay that loan back?  
3 A. I don't have any outstanding loans  
4 with him.  
5 Q. So you paid it back?  
6 A. I don't have any outstanding loans  
7 with him.  
8 Q. That's not an answer to my  
9 question.  
10 Did you pay back Jeffrey for the  
11 loans?  
12 A. I have paid back any loans I had  
13 with him.  
14 Q. You have or haven't?  
15 A. Have.  
16 Q. Were there any other gifts that  
17 Jeffrey gave you during the time period of  
18 say 1999 to the present that were in excess  
19 of \$50,000?  
20 MR. PAGLIUCA: Objection to the  
21 form and foundation.  
22 A. What's the question again?  
23 Q. Did Jeffrey give you any gifts in  
24 excess of amounts of \$50,000, I'm not talking  
25 about a scarf here or something

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1 G Maxwell - Confidential  
2 insignificant, from 1999 to the present?  
3 A. I can't recollect any gifts.  
4 Q. Did he ever buy you a car?  
5 A. I really don't recall, I can't  
6 recall, it's a long time ago.  
7 Q. You can't recall if Jeffrey Epstein  
8 ever bought you a car?  
9 A. I believe he did buy me a car, I  
10 don't recall how much it cost. I don't  
11 recall any of the financial details of that.  
12 Q. Do you still have that car?  
13 A. I don't.  
14 Q. How long ago did you get rid of  
15 that car?  
16 A. I don't recall all the cars. There  
17 was a car back -- there was -- I don't  
18 recall, I'm sorry.  
19 Q. He supplied you with several cars?  
20 MR. PAGLIUCA: Object to the form  
21 and the mischaracterization of the  
22 testimony.  
23 A. I don't recall details of the cars.  
24 Q. Did he supply with you more than  
25 one car?

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1 G Maxwell - Confidential  
2 A. Over the course of time, I've  
3 driven many cars.  
4 Q. That Jeffrey provided to you?  
5 A. They were cars that could be driven  
6 and I just don't recall them.  
7 Q. Were they in your name?  
8 A. I don't recall.  
9 Q. You don't recall if Jeffrey Epstein  
10 ever put a car in your name?  
11 A. We are talking a long time ago, I  
12 really don't recall.  
13 Q. When is the last time you had a car  
14 from Jeffrey Epstein that you used?  
15 A. 2000, 2001, 2002.  
16 Q. Do you recall what kind of a car  
17 that was?  
18 A. I don't recall, I'm sorry.  
19 Q. Did Jeffrey Epstein purchase  
20 anything else for you besides the townhouse  
21 and cars that would be over the amount of  
22 \$50,000?  
23 A. I didn't say that he did, I said I  
24 had a loan.  
25 Q. Besides the loan, I'm sorry, you

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1 G Maxwell - Confidential  
2 are right, you did say you had a loan and you  
3 said you paid that back, correct?  
4 A. That's my testimony.  
5 Q. Anything else in excess of \$50,000  
6 that he would have purchased for you?  
7 A. We are talking 2002, 2001, I don't  
8 recall any gifts really.  
9 Q. When is the last time Jeffrey  
10 Epstein gave you a gift in excess of \$50,000?  
11 MR. PAGLIUCA: Assumes facts not in  
12 evidence. Form and foundation.  
13 Q. You're saying you don't remember  
14 from 2001 and 2002. I'm asking when is the  
15 last time you remember Jeffrey Epstein  
16 purchasing a gift for you?  
17 A. I don't recall gifts in excess of  
18 \$50,000, I barely recall gifts, I barely  
19 recall a lot of this -- I'm sorry, I don't  
20 recall.  
21 Q. Is Jeffrey Epstein paying for your  
22 legal fees in this case?  
23 A. No.  
24 Q. Is he paying for anything related  
25 to this case?

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1 G Maxwell - Confidential  
2 A. No.  
3 Q. Are you aware of any grand theft  
4 police report relating to Virginia Roberts?  
5 A. I believe I've read a report in the  
6 press on that.  
7 Q. Did you provide the press with a  
8 report on a grand theft by Virginia Roberts?  
9 A. I don't know how the press got that  
10 story.  
11 Q. Do you know if Virginia Roberts  
12 committed a grand theft?  
13 A. I only know what I read in the  
14 press.  
15 Q. Did you ever state to the press  
16 that Virginia Roberts committed a grand  
17 theft?  
18 A. I've never had any conversation  
19 directly with press.  
20 Q. Did any of your representatives  
21 ever inform the press that Virginia Roberts  
22 committed a grand theft?  
23 MR. PAGLIUCA: Objection to the  
24 form and foundation.  
25 A. I have no way of knowing what my

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1 G Maxwell - Confidential  
2 representatives said to press or didn't.  
3 Q. Did they ever discuss with you the  
4 fact that they were going to report that  
5 Virginia Roberts participated in a grand  
6 theft?  
7 A. I don't know how, first of all, I  
8 don't know how I know that. I believe I read  
9 it in a press report so...  
10 Q. I'm going to mark this as composite  
11 exhibit, Maxwell 14 please?  
12 (Maxwell Exhibit 14, email, marked  
13 for identification.)  
14 Q. I'm going to direct you to page GM  
15 00109. At the top of that page you are going  
16 to see an email address from Jeffrey Epstein  
17 on Sunday June 12, 2011 to [REDACTED]  
18 [REDACTED]  
19 A. Yes.  
20 Q. The re line says, This is the  
21 actual version they wanted me to send which I  
22 changed but this is back from my U.K.  
23 lawyers.  
24 Do you see that?  
25 A. Yes.

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1 G Maxwell - Confidential  
 2 Q. If you go down further, you're  
 3 going to see halfway through the page, you  
 4 will see your email address the [REDACTED]  
 5 and you will see a statement that says, Thank  
 6 you. I have it now. I'm working on the  
 7 letter a little. I will send final version  
 8 tomorrow and whatever is in it will be  
 9 factually accurate.

10 Beneath that you will see Philip  
 11 Barden who I believe you identified earlier  
 12 as one of your attorneys?

13 A. Uh-huh.

14 Q. And you will see a letter, starting  
 15 the text of a letter starting, I want you to  
 16 turn to the second page which is GM 00110.  
 17 About halfway through the page, it says you  
 18 will also presumably draw attention to the  
 19 fact that prior to filing her suit against  
 20 Mr. Epstein, Ms. Roberts fled the U.S. to  
 21 avoid being arrested for grand theft. Police  
 22 report available.

23 What grand theft were you referring  
 24 to there that Virginia Roberts committed?

25 MR. PAGLIUCA: Objection to the

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1 G Maxwell - Confidential  
 2 form and foundation.

3 A. I don't know. However, I believe  
 4 she stole money from somewhere where she  
 5 worked.

6 Q. How do you know that was grand  
 7 theft?

8 A. I don't know how I know that.

9 Q. So you authorized a statement that  
 10 characterized that as grand theft without  
 11 knowing whether it was grand theft?

12 A. What month, what is the date of  
 13 this?

14 Q. The date of this is June 12, 2011?

15 A. So I'm afraid such a long time ago,  
 16 I'm not sure how, I really couldn't testify  
 17 as to how that language ended up in here.

18 Q. Do you have the police report? It  
 19 says police report available. Do you have  
 20 that document?

21 A. I don't have that document.

22 Q. Who does?

23 A. I have no idea.

24 Q. Would your lawyer Philip Barden  
 25 have that document?

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1 G Maxwell - Confidential

2 A. I don't know who has this document.

3 Q. What's your basis in that statement  
 4 for saying Ms. Roberts fled the U.S.?

5 A. Again, you are asking me for a  
 6 statement that I made in 2011 and I can't say  
 7 what in 2011 exactly the basis of that  
 8 statement was.

9 Q. So you don't know whether or not  
 10 that statement is true?

11 A. This is in 2011 and it never went  
 12 out, so I'm not sure exactly.

13 Q. But you said in your email that you  
 14 were working to make it factually accurate,  
 15 is that correct?

16 A. That's what it says.

17 Q. I'm going to mark as Maxwell 15 a  
 18 document dated February 24, 2015?

19 (Maxwell Exhibit 15, email, marked  
 20 for identification.)

21 Q. This is an email from Ross Gow who  
 22 you've identified as your press agent on  
 23 February 24, 2015 to [REDACTED] which I understand  
 24 to be your email address and Philip Barden.  
 25 The subject line says, VR cried rape. Prior

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2 case dismissed as prosecutors found her not  
 3 credible. The message says, Ghislaine, some  
 4 helpful leakage, dot dot dot. What is it you  
 5 were leaking to the press?

6 MR. PAGLIUCA: Objection, there is  
 7 no foundation that she leaked anything  
 8 and you know that.

9 Q. What was it that you were leaking  
 10 to the press in that statement?

11 A. Again, I don't think that's  
 12 referring to that, that's just referring to  
 13 the press getting hold of whatever story it  
 14 is.

15 Q. What was Ross Gow leaking to the  
 16 press?

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

19 A. It doesn't say Ross was leaking  
 20 anything. It doesn't say that.

21 Q. The statement says, helpful  
 22 leakage, is that correct?

23 A. It says helpful leakage. That  
 24 doesn't mean he leaked anything.

25 Q. Did you leak to the press

<p style="text-align: right;">Page 350</p> <p>1 G Maxwell - Confidential</p> <p>2 information to the press information about</p> <p>3 the subject line, VR cried rape, prior case</p> <p>4 dismissed as prosecutors found her not</p> <p>5 credible?</p> <p>6 A. I don't no idea what Ross is</p> <p>7 referring to. I think he is referring to the</p> <p>8 press held the story. I couldn't testify to</p> <p>9 that.</p> <p>10 Q. Did you leak to the press</p> <p>11 information regarding the statement, VR cried</p> <p>12 rape prior case dismissed as prosecutors</p> <p>13 found her not credible, either through you or</p> <p>14 through your press agents?</p> <p>15 A. I think this is coming from the</p> <p>16 daily mail.</p> <p>17 Q. That is not my question, I'm asking</p> <p>18 whether you or your press agent leaked that?</p> <p>19 A. I have no knowledge, I have no</p> <p>20 idea, I'm sorry. I can't -- I have no</p> <p>21 recollection. I have no idea what she is</p> <p>22 talking about.</p> <p>23 Q. I'm going to mark this as 16?</p> <p>24 (Maxwell Exhibit 16 email marked</p> <p>25 for identification.)</p>	<p style="text-align: right;">Page 352</p> <p>1 G Maxwell - Confidential</p> <p>2 false?</p> <p>3 A. He did not.</p> <p>4 Q. Do you know whether Jeffrey Epstein</p> <p>5 paid Rebecca Boylen to give testimony about</p> <p>6 Virginia Roberts?</p> <p>7 A. I don't know who Rebecca Boylen is.</p> <p>8 Q. So you don't know whether Jeffrey</p> <p>9 Epstein paid her?</p> <p>10 A. I don't know who Rebecca Boylen is.</p> <p>11 Q. Have you ever contacted any of</p> <p>12 Virginia's friends, acquaintances or family</p> <p>13 regarding this case?</p> <p>14 A. I don't know who Virginia's friends</p> <p>15 or family are and I have not contacted</p> <p>16 anybody related to her in any way, shape or</p> <p>17 form.</p> <p>18 Q. I will turn you, I believe it's the</p> <p>19 thicker document which is Maxwell, I believe</p> <p>20 it was 14, right there, the compilation</p> <p>21 document to GM, at the bottom, GM 00071. You</p> <p>22 actually may want to turn to the prior page</p> <p>23 70 so you can see the email chain. At the</p> <p>24 top of the page --</p> <p>25 MR. PAGLIUCA: I don't have a 00071</p>
<p style="text-align: right;">Page 351</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. This is an email addressed at the</p> <p>3 top from Jeffrey Epstein on Monday, January</p> <p>4 12, 2015 to [REDACTED] which I understand to be</p> <p>5 your email address. The email reads, You can</p> <p>6 issue a reward to any of Virginia's friends,</p> <p>7 aquaints, family, that come forward to help</p> <p>8 prove her allegations are false. The</p> <p>9 strongest is the Clinton dinner and the new</p> <p>10 version of the Virgin Islands that Stven</p> <p>11 Hawking practiced in an underage orgy.</p> <p>12 Did you offer any rewards to</p> <p>13 Virginia's family or friends to contradict</p> <p>14 Virginia's story?</p> <p>15 A. Absolutely not.</p> <p>16 Q. Did Jeffrey Epstein offer any</p> <p>17 rewards to any of Virginia's, as he suggests</p> <p>18 here, friends, family or acquaintances to</p> <p>19 contradict Virginia's story?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I have no idea what he did.</p> <p>23 Q. Did he tell he was going to offer</p> <p>24 rewards to Virginia's acquaintances, friends</p> <p>25 and family to prove her allegations were</p>	<p style="text-align: right;">Page 353</p> <p>1 G Maxwell - Confidential</p> <p>2 on mine.</p> <p>3 MS. McCAWLEY: It's the second page</p> <p>4 in that document.</p> <p>5 MR. PAGLIUCA: Okay.</p> <p>6 Q. It's dated Friday March 11, 2011</p> <p>7 from Maxwell to Jeffrey with the title, Daily</p> <p>8 Mail and there is a forward from Ross Gow to</p> <p>9 you and a number of other individuals, that's</p> <p>10 on the cover page and as you scroll to the</p> <p>11 second page, you are going to see that part</p> <p>12 of the chain that I'm asking about and that</p> <p>13 is the chain at the bottom which is dated</p> <p>14 3/10/2011 from Brian Basham and it says we</p> <p>15 think -- we should think about the letter to</p> <p>16 the editor. School can be university. Age</p> <p>17 of consent in Florida is complex. See below,</p> <p>18 if you are 16 years old, a sexual</p> <p>19 relationship with someone between 18 and 24</p> <p>20 is legal in Florida. Two persons between 16</p> <p>21 and 24, Florida statute 794.05. A person 24</p> <p>22 years or of age or older who engages in</p> <p>23 sexual activity with a person 16 or 17 years</p> <p>24 of age commits a felony in the second degree.</p> <p>25 So as soon as you turn 16 you are able to</p>



<p style="text-align: right;">Page 354</p> <p>1 G Maxwell - Confidential</p> <p>2 have sexual relations and you can have sexual</p> <p>3 relations with a minor under the age of 18</p> <p>4 until your 24th birthday.</p> <p>5 Why were you concerned with the age</p> <p>6 of consent in Florida?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation of the question.</p> <p>9 A. I wasn't concerned. I think this</p> <p>10 was somebody sending me the statute for</p> <p>11 informational purposes.</p> <p>12 Q. Who is Brian Basham?</p> <p>13 A. He is the person who, Ross Gow's</p> <p>14 boss I believe, I don't know what the</p> <p>15 relationship is.</p> <p>16 Q. I didn't hear you?</p> <p>17 A. I think he owns the agency, I'm not</p> <p>18 sure exactly.</p> <p>19 Q. Why would he be sending you</p> <p>20 information addressing concerns about the age</p> <p>21 of consent in Florida?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. I think he was just trying to be --</p> <p>25 telling me details that would happen,</p>	<p style="text-align: right;">Page 356</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. I'm going to turn you now in that</p> <p>3 same stack the Bates number GM 00088. At the</p> <p>4 top of the email you are going to see Jeffrey</p> <p>5 Epstein, dated June 8, 2011, to you and it's</p> <p>6 got a re line, Vanity Fair. If you go down</p> <p>7 the chain you will see where it says under</p> <p>8 your email, Do you have a problem with</p> <p>9 anything I said.</p> <p>10 Were you communicating with Jeffrey</p> <p>11 to confirm what statements you could put in</p> <p>12 any press releases you were given?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. Any interest I have is in accuracy.</p> <p>16 Q. Were you confirming with Jeffrey</p> <p>17 Epstein what information you could put in</p> <p>18 press releases?</p> <p>19 MR. PAGLIUCA: Objection to the</p> <p>20 form and foundation.</p> <p>21 A. Again, I'm only looking for</p> <p>22 accuracy.</p> <p>23 Q. Why would you ask him if he had a</p> <p>24 problem with anything you were saying?</p> <p>25 A. If there is anything I</p>
<p style="text-align: right;">Page 355</p> <p>1 G Maxwell - Confidential</p> <p>2 Virginia in '11 was claiming she was 15 and</p> <p>3 we thought she was 17. I didn't know what</p> <p>4 the statutes were in Florida and I think he</p> <p>5 was just trying to be helpful so I would</p> <p>6 know.</p> <p>7 Q. Did you have a concern that you had</p> <p>8 violated this statute in Florida?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation.</p> <p>11 A. No.</p> <p>12 Q. Did you have a concern that Jeffrey</p> <p>13 Epstein had violated this statute in Florida?</p> <p>14 A. I'm not concerned what happened</p> <p>15 with Jeffrey. I'm only concerned what</p> <p>16 happens with me.</p> <p>17 Q. Why did you communicate with your</p> <p>18 press agent about the sexual consent age in</p> <p>19 Florida?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation. It misstates her</p> <p>22 testimony.</p> <p>23 A. I wasn't concerned. I think he was</p> <p>24 being helpful and stating what the statute</p> <p>25 was.</p>	<p style="text-align: right;">Page 357</p> <p>1 G Maxwell - Confidential</p> <p>2 characterized that was not correct.</p> <p>3 Q. That's not what you said. You</p> <p>4 said, do you have a problem with anything I</p> <p>5 said.</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation. There is no</p> <p>8 question pending.</p> <p>9 MS. McCAWLEY: There is.</p> <p>10 MR. PAGLIUCA: That's not a</p> <p>11 question, it's a statement.</p> <p>12 MS. McCAWLEY: Don't interrupt me.</p> <p>13 Q. Di you say, do you have a problem</p> <p>14 with anything I said?</p> <p>15 A. That was asking in my parlance that</p> <p>16 I wanted him to check it for accuracy.</p> <p>17 Q. Did he tell you there was anything</p> <p>18 inaccurate about the statement?</p> <p>19 A. Again, I have to read the whole</p> <p>20 thing to figure that out.</p> <p>21 Q. Were you coordinating with Jeffrey</p> <p>22 Epstein during this time period in 2011</p> <p>23 regarding statements that you were issuing to</p> <p>24 the press?</p> <p>25 MR. PAGLIUCA: Did you withdraw the</p>

<p style="text-align: right;">Page 358</p> <p>1 G Maxwell - Confidential</p> <p>2 last question.</p> <p>3 MS. McCAWLEY: I'm not withdrawing</p> <p>4 anything. I'm asking a question.</p> <p>5 MR. PAGLIUCA: There was a question</p> <p>6 pending. You didn't let the witness</p> <p>7 answer the question, then you moved on</p> <p>8 to another question so I'm asking for</p> <p>9 clarification for the record now which</p> <p>10 question are we answering.</p> <p>11 MS. McCAWLEY: There is an answer.</p> <p>12 The question was did he tell you</p> <p>13 anything, there was anything in the</p> <p>14 statement inaccurate about the statement</p> <p>15 and she said again, I read the whole</p> <p>16 thing --</p> <p>17 THE WITNESS: I would have to.</p> <p>18 MS. McCAWLEY: -- I would have to</p> <p>19 read the whole thing to figure that out.</p> <p>20 MR. PAGLIUCA: Then she started</p> <p>21 reading it and you asked another</p> <p>22 question.</p> <p>23 MS. McCAWLEY: That's the question.</p> <p>24 MR. PAGLIUCA: I'm wondering if its</p> <p>25 still pending.</p>	<p style="text-align: right;">Page 360</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to the</p> <p>3 form and foundation.</p> <p>4 A. I was not coordinating with</p> <p>5 Jeffrey. He had details that I did not have.</p> <p>6 I was not party to his case. I needed to</p> <p>7 have information in order to be able to</p> <p>8 respond so I was not coordinating with him.</p> <p>9 I was merely asking for details that I could</p> <p>10 have.</p> <p>11 Q. Did Jeffrey write any of your press</p> <p>12 statements for you?</p> <p>13 A. No.</p> <p>14 Q. He didn't draft any of them?</p> <p>15 A. I have a lawyer who was working on</p> <p>16 this and that was -- I asked, I believe as I</p> <p>17 recollect asked him for information to make</p> <p>18 sure I was being accurate in the</p> <p>19 representations for whatever I was</p> <p>20 discussing.</p> <p>21 Q. Did Jeffrey provide you with any</p> <p>22 drafts of statements to provide to the press?</p> <p>23 A. I only recall drafts from my</p> <p>24 lawyer.</p> <p>25 Q. I will mark this as Maxwell 17.</p>
<p style="text-align: right;">Page 359</p> <p>1 G Maxwell - Confidential</p> <p>2 MS. McCAWLEY: It was answered.</p> <p>3 Q. Were you coordinating with Jeffrey</p> <p>4 Epstein during the time period in 2011</p> <p>5 regarding the statements you were issuing to</p> <p>6 the press?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. I only wanted to be accurate in any</p> <p>10 factual statements that I made.</p> <p>11 Q. You knew at that time that Jeffrey</p> <p>12 Epstein had been convicted for sexual abuse</p> <p>13 of a minor, is that correct?</p> <p>14 MR. PAGLIUCA: Objection to form</p> <p>15 and foundation.</p> <p>16 A. He was sentenced I believe for</p> <p>17 underage -- soliciting an underaged</p> <p>18 prostitute.</p> <p>19 Q. You knew that he was a registered</p> <p>20 sex offender?</p> <p>21 A. Yes.</p> <p>22 Q. You were coordinating with him the</p> <p>23 statement that you were going to be making to</p> <p>24 the press to confirm whether they were</p> <p>25 accurate in your words?</p>	<p style="text-align: right;">Page 361</p> <p>1 G Maxwell - Confidential</p> <p>2 (Maxwell Exhibit 17, email, marked</p> <p>3 for identification.)</p> <p>4 Q. This is an email from you on</p> <p>5 January 10, 2015 to Philip Barden and Ross</p> <p>6 Gow. The statement you had before you</p> <p>7 earlier, that, if you can pull that in front</p> <p>8 of you, the one page press release that you</p> <p>9 gave. You might know from memory.</p> <p>10 Was the press release that you</p> <p>11 issued with the statement about Virginia</p> <p>12 issued in or around January 2, 2015?</p> <p>13 A. As best as I can recollect.</p> <p>14 Q. I want to turn your attention to</p> <p>15 the document I just handed you which is Bates</p> <p>16 No. 001044, from you to Philip Barden and</p> <p>17 Ross Gow. It says in the first sentence, I'm</p> <p>18 out of my depth to understand defamation,</p> <p>19 other legal hazards and I don't want to end</p> <p>20 up in a lawsuit aimed at me from anyone, if I</p> <p>21 can help it. Apparently, even saying</p> <p>22 Virginia is a liar has hazards.</p> <p>23 You knew at the time you called</p> <p>24 Virginia a liar in early January of 2015 that</p> <p>25 that was something that would result in a</p>

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2 lawsuit, is that correct?  
3 MR. PAGLIUCA: Objection to the  
4 form and foundation.  
5 A. I have legal advice that I took.  
6 Q. But you knew in early January by  
7 making a statement calling Virginia a liar  
8 that you were subjecting yourself to a legal  
9 dispute with her?  
10 MR. PAGLIUCA: Objection to the  
11 form and foundation.  
12 A. I took legal advice as to what  
13 should be said and not be said and the legal  
14 advice that came from the United Kingdom  
15 was --  
16 MR. PAGLIUCA: You are not allowed  
17 to talk about any legal advice that you  
18 got from anybody that's a lawyer.  
19 A. Sorry.  
20 Q. So is it correct without telling me  
21 what you talked to your lawyers about that  
22 you knew because this is dated January 10  
23 that when you made this statement in early  
24 January, January 2 of 2015 you knew that  
25 calling Virginia a liar would subject you to

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1 G Maxwell - Confidential  
2 a legal action, isn't that correct?  
3 MR. PAGLIUCA: Objection to the  
4 form and foundation. As to what you  
5 knew -- whatever she knows would be  
6 privileged.  
7 MS. McCAWLEY: I'm asking if she  
8 knows. I'm not asking her to tell me  
9 about her privileged communications.  
10 A. All I can say is I asked a question  
11 and received legal advice.  
12 (Maxwell Exhibit 18, email, marked  
13 for identification.)  
14 Q. This is an email dated January 15,  
15 2015 from Jeffrey Epstein to you?  
16 A. Uh-huh.  
17 Q. It states in the first line, do you  
18 want [REDACTED] to come out and say she was the  
19 girlfriend during the time?  
20 MR. PAGLIUCA: Objection to the  
21 form and foundation of the question and  
22 actually the word is [REDACTED], there  
23 is no vowel in there.  
24 MS. McCAWLEY: I was just trying to  
25 pronounce it.

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1 G Maxwell - Confidential  
2 Q. This email reads do you want  
3 [REDACTED] without a vowel, to come out and say  
4 she was the girlfriend during the time.  
5 Who was Jeffrey Epstein referring  
6 to?  
7 A. I believe he was referring to  
8 [REDACTED]  
9 Q. Why was he asking you if you wanted  
10 [REDACTED] to come out and say she was the  
11 girlfriend?  
12 MR. PAGLIUCA: Objection to the  
13 form and foundation.  
14 A. The way the press and you were  
15 characterizing me is I was with Jeffrey  
16 throughout this entire period of time and I  
17 was not.  
18 Q. Was [REDACTED] with Jeffrey during this  
19 period of time?  
20 A. I believe she was.  
21 Q. Did Jeffrey come out and tell the  
22 press it was [REDACTED] and not you that was with  
23 him as he is proposing here?  
24 A. I don't believe he did.  
25 Q. Did you want him to do that?

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1 G Maxwell - Confidential  
2 A. No, I didn't ask him to do  
3 anything. No.  
4 Q. So do you know in January of 2015,  
5 was [REDACTED] his girlfriend?  
6 A. 2015, I have no idea who was his  
7 girlfriend in 2015.  
8 Q. I'm sorry, you are correct.  
9 In the period of 1999 to 2002, was  
10 [REDACTED] his girlfriend?  
11 A. They spent a lot of time together.  
12 Q. Did you talk to [REDACTED] about going  
13 to the press and saying that she was the  
14 girlfriend and not you?  
15 A. I have never spoken to [REDACTED]  
16 Q. Was [REDACTED] offered any money to  
17 make a statement that she was the girlfriend?  
18 MR. PAGLIUCA: Objection to the  
19 form and foundation.  
20 A. I have no idea. I have never  
21 spoken to [REDACTED] and I don't know anything --  
22 I have no idea.  
23 (Maxwell Exhibit 19, email, marked  
24 for identification.)  
25 Q. That's an email from Jeffrey to

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2 Maxwell dated January 25, 2015.  
3 A. Uh-huh.  
4 Q. I will direct your attention to the  
5 bottom email which is from you on Saturday  
6 January 24, 2015. It says, I would  
7 appreciate it if [REDACTED] would come out and  
8 say she was your girlfriend. I think she was  
9 from the end of '99 to 2002.  
10 Does that refresh your recollection  
11 that you asked Jeffrey to have [REDACTED] come  
12 out and say she was his girlfriend?  
13 A. I'm sure I would loved anybody to  
14 come out and say they were with Jeffrey  
15 rather than me.  
16 Q. Was that an accurate statement you  
17 were asking to be made to the press?  
18 MR. PAGLIUCA: Objection to the  
19 form and foundation.  
20 A. When is this?  
21 Q. 2015. The statement is whether she  
22 was the girlfriend from '99 to 2002. As the  
23 email reads.  
24 A. What is your question?  
25 Q. My question is, was that an

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2 accurate statement you were going to be  
3 giving to the press?  
4 A. I didn't make the statement and  
5 [REDACTED] never came out, so it's completely  
6 moot.  
7 Q. My question is, was it an accurate  
8 statement that [REDACTED] was the girlfriend from  
9 '99 to 2002 or were you just making that up  
10 for purposes of deflecting press from you?  
11 MR. PAGLIUCA: Objection to the  
12 form and foundation.  
13 A. As I said they spent a lot of time  
14 together and...  
15 Q. Were you also his girlfriend from  
16 '99 to 2002?  
17 A. I don't if I would have ever  
18 characterized myself as his girlfriend, but  
19 [REDACTED] at that time, was with him as much if  
20 not more than I was.  
21 Q. I will mark this as Maxwell 20?  
22 (Maxwell Exhibit 20, email, marked  
23 for identification.)  
24 Q. This is an email at the top, it's  
25 Bates labled 001060. At the top is a chain

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2 from Jeffrey to you on January 11, 2015 and  
3 if you look below, I'm going to start at the  
4 bottom of that chain which is January 11 at  
5 9:15 from Jeffrey and he wrote, Alan, do you  
6 have an article coming out in Monday's paper.  
7 If so, could you please forward us a copy.  
8 Do you know what Alan Jeffrey was  
9 referring to there?  
10 A. I don't know.  
11 Q. If you look up in the email chain  
12 do you see an email address from Alan  
13 Dershowitz responding to that letter?  
14 A. I do.  
15 Q. So that would be Alan Dershowitz  
16 that Jeffrey was emailing at that time  
17 according to this chain, correct?  
18 A. It certainly looks like it.  
19 Q. The email from Alan to Jeffrey is,  
20 Nothing on Monday. I'm working on several  
21 possible articles about unfairness in the  
22 legal process that allows false charges to be  
23 inserted into legal documents with no  
24 opportunity to respond.  
25 And do you see above that Jeffrey's

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2 email to you says, quote, Careful.  
3 A. Is that to me or to Alan?  
4 Q. Jeffrey to [REDACTED] at the top. Why  
5 was Jeffrey telling you to be careful?  
6 MR. PAGLIUCA: Objection to the  
7 form and foundation.  
8 A. I have no idea.  
9 Q. What was he concerned about with  
10 Alan Dershowitz's suggestion in the email  
11 below?  
12 MR. PAGLIUCA: Objection to form  
13 and foundation.  
14 A. I can't possibly know.  
15 Q. Did you discuss with him why he  
16 told you to be careful?  
17 A. I had limited contact with him. I  
18 don't recall where this goes in the chain,  
19 why he was telling me to be careful, I have  
20 no idea.  
21 Q. Did you respond to this email?  
22 A. If you don't have it, I didn't  
23 respond.  
24 Q. Did you ever delete emails during  
25 the period of January of 2015?



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<p>1 G Maxwell - Confidential</p> <p>2 A. I have every email that you asked</p> <p>3 for in discovery, that I have I gave you.</p> <p>4 Q. That's not my question.</p> <p>5 Did you ever delete emails in</p> <p>6 January of 2015?</p> <p>7 A. I have not deleted anything that</p> <p>8 you have asked me for in discovery. I have</p> <p>9 given you everything that I have.</p> <p>10 Q. That is not my question, my</p> <p>11 question is, did you ever delete emails in</p> <p>12 January of 2015?</p> <p>13 A. In the normal course of my work,</p> <p>14 there are emails from spam that I delete.</p> <p>15 That is the type of email I've deleted.</p> <p>16 Anything that is material to what you want, I</p> <p>17 have not deleted.</p> <p>18 Q. How do you know that?</p> <p>19 A. Well, anybody that's to do with</p> <p>20 Jeffrey or Alan or women or anything of which</p> <p>21 I know you were interested in, of which I</p> <p>22 have anything I would not have done because I</p> <p>23 don't want to subject myself to...</p> <p>24 Q. Have you had your computer</p> <p>25 forensically copied for purposes of this</p>	<p>1 G Maxwell - Confidential</p> <p>2 Q. Earlier today, you said you were in</p> <p>3 the process of resolving the sale of your</p> <p>4 town home. Where do you intend to live once</p> <p>5 your town home is sold?</p> <p>6 A. That's a good question. I don't</p> <p>7 have an answer for you yet.</p> <p>8 Q. You don't have a present plan. Do</p> <p>9 you intend to live in the United States?</p> <p>10 A. I don't have a present plan.</p> <p>11 Q. Are you living outside of your town</p> <p>12 home right now or are you still there?</p> <p>13 A. I'm just couch surfing.</p> <p>14 Q. Has Jeffrey Epstein ever purchased</p> <p>15 a company for you or put a company in your</p> <p>16 name?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I have no recollection.</p> <p>20 Q. Is there a Ghislaine Maxwell</p> <p>21 corporation, for example?</p> <p>22 A. No, not that I am aware of that has</p> <p>23 anything to do with me. There may be with</p> <p>24 one that someone else owns or started but not</p> <p>25 one that is related to me.</p>
Page 371	Page 373
<p>1 G Maxwell - Confidential</p> <p>2 litigation?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. Has someone made a copy of your</p> <p>6 computer for purposes of this litigation.</p> <p>7 A. No.</p> <p>8 Q. Are you a citizen of the United</p> <p>9 States?</p> <p>10 A. I am.</p> <p>11 Q. Are you also a citizen of England?</p> <p>12 A. I am.</p> <p>13 Q. Are you a citizen of any other</p> <p>14 land?</p> <p>15 A. TerraMar.</p> <p>16 Q. That's the name of your charity</p> <p>17 project that deals with oceans, is that</p> <p>18 correct?</p> <p>19 A. Yeah. I'm French as well.</p> <p>20 Q. Has Jeffrey Epstein funded TerraMar</p> <p>21 for you?</p> <p>22 A. He did give some money to TerraMar,</p> <p>23 yes.</p> <p>24 Q. How much?</p> <p>25 A. I believe it was \$50,000.</p>	<p>1 G Maxwell - Confidential</p> <p>2 MS. McCRAWLEY: I'm going to take a</p> <p>3 short break and make sure to keep it</p> <p>4 short because I know you wanted to -- I</p> <p>5 just want to wrap up what we have left.</p> <p>6 THE VIDEOGRAPHER: It's now 5:49 we</p> <p>7 are off the record.</p> <p>8 (Recess.)</p> <p>9 THE VIDEOGRAPHER: It's now 6:00</p> <p>10 p.m. and we are back on the record.</p> <p>11 Q. Ms. Maxwell, do you recall being</p> <p>12 subpoenaed for a deposition back in 2009?</p> <p>13 A. I do.</p> <p>14 Q. Why did you avoid giving your</p> <p>15 deposition in that case when you were</p> <p>16 subpoenaed and had the opportunity to tell</p> <p>17 your side of the story?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 A. That's not what happened.</p> <p>21 Q. What happened?</p> <p>22 A. As I best recall, I was subpoenaed</p> <p>23 and a date was set for the subpoena and</p> <p>24 everything was set and I believe it was with</p> <p>25 Brad Edwards, correct me if I'm wrong, and</p>

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1 G Maxwell - Confidential  
2 Brad Edwards failed to show up for the  
3 subpoena.

4 Q. So your testimony is Brad Edwards  
5 did not show up for the deposition that had  
6 been set?

7 A. Correct.

8 Q. Did you give any statement that  
9 your mother was ill and, therefore, you  
10 couldn't take your deposition and had to  
11 leave the country indefinitely?

12 A. That's an entirely separate  
13 situation. Brad Edwards was involved in the  
14 Rothstein scandal which was a RICO, I  
15 believe, you know, is when fake suits were  
16 created in Jeffrey's case and Rothstein went  
17 to jail for 50 years and Brad Edwards worked  
18 for that firm.

19 Q. And Mr. Edwards worked for that  
20 firm?

21 A. So when the subpoena came, Brad  
22 Edwards was involved with Rothstein in the  
23 case so when I was called for subpoena, then  
24 and I had a subpoena, date and time set, Brad  
25 Edwards went AWAL, meaning he failed to

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1 G Maxwell - Confidential  
2 respond to calls and failed to get in touch  
3 with my attorneys, even though a date and  
4 time was set for the subpoena and so that's  
5 what happened to that subpoena. It just  
6 didn't happen.

7 Q. We may be talking about two  
8 different cases so I will ask the question  
9 again.

10 Was there ever a time where you  
11 were subpoenaed to sit for a deposition that  
12 you could not make it because you said that  
13 your mother was ill?

14 A. So that is the same subpoena that  
15 Brad Edwards failed to turn up for and then I  
16 think five or six months passed between -- a  
17 period of time, I can't characterize it  
18 exactly, a period of time passed where then  
19 he resurfaced and asked for a new subpoena to  
20 be -- a new time to be set and because he had  
21 contacted the press and done all sorts of  
22 things that you guys are familiar with, I  
23 believe, it was my lawyer suggested that I  
24 should have some sort of protective order and  
25 I believe between the time for when Brad

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1 G Maxwell - Confidential  
2 Edwards resurfaced after the Rothstein story,  
3 when the guy went to jail for 50 years for  
4 creating fake cases in Jeffrey's and other  
5 people's cases, in between the time when  
6 there were -- trying to figure out the  
7 protective situation for me, my mother was  
8 sick, she is 89, she was 89 at that time so I  
9 -- they -- we can all -- we all have parents,  
10 so anyone, I don't know how old your parents  
11 are but any parent or godparent, any  
12 individual who is in the late 80s 90s, we can  
13 understand has health issues so my mother's  
14 health was deteriorating very rapidly at that  
15 time and we had issues at home with who she  
16 would talk to and how to manage her, her  
17 healthcare situation and so I went home.  
18 They were still arguing about the protective  
19 order --

20 Q. Is it your testimony that there was  
21 not a date set for your deposition at the  
22 time you left to go see your mother?

23 A. I don't believe so.

24 Q. Are you friends with the Clintons?

25 A. I am.

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1 G Maxwell - Confidential  
2 Q. Did you attend a wedding of Chelsea  
3 Clinton a few weeks after the date was set,  
4 let's say a few weeks after you left to go  
5 see your mother who was ill?

6 A. I don't recall exactly when I left  
7 but it was before, a few weeks before -- I  
8 don't remember the exact timing of that, so  
9 I'm sorry, can you repeat the question?

10 Q. Did you come back to the United  
11 States to attend Chelsea Clinton's wedding?

12 A. I attended Chelsea Clinton's  
13 wedding but I don't know if I came back  
14 specifically for that or not.

15 Q. When we were looking at the flight  
16 logs earlier, there was a flight where you  
17 ended up in the naval base, I believe it was  
18 in China, do you know how you got clearance  
19 to land at that naval base?

20 A. I need to have a look at whatever  
21 document.

22 Q. It's one of the flight logs, it was  
23 on the flight with Clinton when we were  
24 talking about you landed at a naval base. I  
25 know you are a pilot, do you know what you

<p style="text-align: right;">Page 378</p> <p>1 G Maxwell - Confidential</p> <p>2 had to do to get clearance to land at that</p> <p>3 naval base.</p> <p>4 MR. PAGLIUCA: If you need to look</p> <p>5 at something to answer the question, you</p> <p>6 can. If you can't answer the question</p> <p>7 without looking at something just</p> <p>8 indicate such.</p> <p>9 A. Regardless, I wouldn't have any</p> <p>10 knowledge of that.</p> <p>11 Q. Was Sarah Kellen traveling with you</p> <p>12 on the flights you were on with Clinton?</p> <p>13 A. I would have to look at a document.</p> <p>14 I wouldn't know if she was on all of them or</p> <p>15 not. I don't know.</p> <p>16 Q. Do you recall her being on any of</p> <p>17 them?</p> <p>18 A. To the best of my recollection, I</p> <p>19 think she was. I don't recollect exactly</p> <p>20 what flight she was on or not.</p> <p>21 Q. Sarah Kellen was one of the</p> <p>22 co-conspirators, physically, in the</p> <p>23 nonconstitution agreement, is that correct?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>	<p style="text-align: right;">Page 380</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 A. I am un -- the answer is no, I</p> <p>4 don't know anything about that.</p> <p>5 Q. Did you ever witness Jean Luc</p> <p>6 Brunel bringing girls under the age of 18 to</p> <p>7 any of Jeffrey residences?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. I don't recollect Jean Luc coming</p> <p>11 to the house with girls, period.</p> <p>12 Q. Do you, when I say house, I'm</p> <p>13 including the U.S. Virgin Island home.</p> <p>14 Do you recollect Jean Luc Brunel</p> <p>15 bringing foreign girls under the age of 18 to</p> <p>16 the U.S. Virgin Island house?</p> <p>17 A. I don't recollect anything like</p> <p>18 that.</p> <p>19 Q. Do you know how Jeffrey Epstein</p> <p>20 made his money?</p> <p>21 A. No.</p> <p>22 Q. Was Les Wexner or is Les Wexner one</p> <p>23 of his clients?</p> <p>24 A. I have no idea.</p> <p>25 Q. What do you know about the</p>
<p style="text-align: right;">Page 379</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I have never seen the document but</p> <p>3 my understanding, I believe, is that she was.</p> <p>4 Q. Did you ever stay the night ever at</p> <p>5 Les Wexner's house in Ohio, have you ever</p> <p>6 stayed the night there?</p> <p>7 A. In his home in Ohio?</p> <p>8 Q. Yes.</p> <p>9 A. I don't believe I did.</p> <p>10 Q. Are you aware of anybody providing</p> <p>11 Jeffrey with two 12 year old girls as a</p> <p>12 birthday present?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. No.</p> <p>16 Q. Are you aware of anybody ever</p> <p>17 providing Jeffrey with French girls under the</p> <p>18 age of 18 as a birthday present?</p> <p>19 MR. PAGLIUCA: Objection to the</p> <p>20 form and foundation.</p> <p>21 A. No.</p> <p>22 Q. Do you know whether Jean Luc Brunel</p> <p>23 provided girls under the age of 18 to Jeffrey</p> <p>24 for the purposes of sex?</p> <p>25 MR. PAGLIUCA: Objection to the</p>	<p style="text-align: right;">Page 381</p> <p>1 G Maxwell - Confidential</p> <p>2 relationship between Jeffrey Epstein and Les</p> <p>3 Wexner?</p> <p>4 A. Are you talking today?</p> <p>5 Q. Yes, today.</p> <p>6 A. I have no idea.</p> <p>7 Q. Do they have a business</p> <p>8 relationship?</p> <p>9 A. I have no idea.</p> <p>10 Q. Did they have a business</p> <p>11 relationship during the time that you were</p> <p>12 working for Jeffrey Epstein?</p> <p>13 A. I believe in the '90s when I was</p> <p>14 there they had a business relationship.</p> <p>15 Q. Did they have any other kind of</p> <p>16 relationship?</p> <p>17 MR. PAGLIUCA: Objection to form</p> <p>18 and foundation.</p> <p>19 A. The only relationship I am aware of</p> <p>20 is the business relationship.</p> <p>21 Q. Do you know why Les Wexner sold the</p> <p>22 New York house or gave the New York house to</p> <p>23 Jeffrey, if you know?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>

<p style="text-align: right;">Page 382</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I know nothing about that</p> <p>3 transaction.</p> <p>4 Q. Can you list for me all the girls</p> <p>5 that you have met and brought to Jeffrey</p> <p>6 Epstein's house that were under the age of</p> <p>7 18?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. I could only recall my family</p> <p>11 members that were there and I could not make</p> <p>12 a list of anyone else because that list -- it</p> <p>13 never happened that I can think of.</p> <p>14 Q. I'm talking about the time you were</p> <p>15 working for Jeffrey Epstein, can you list all</p> <p>16 girls that you found for Jeffrey Epstein that</p> <p>17 were under the age of 18 to come work for him</p> <p>18 in any capacity?</p> <p>19 MR. PAGLIUCA: Objection to the</p> <p>20 form and foundation.</p> <p>21 A. I didn't find the girls.</p> <p>22 Q. You choose the word.</p> <p>23 MR. PAGLIUCA: If you have a</p> <p>24 question ask it, you don't choose the</p> <p>25 word.</p>	<p style="text-align: right;">Page 384</p> <p>1 G Maxwell - Confidential</p> <p>2 Jeffrey that was under the age of 18?</p> <p>3 MR. PAGLIUCA: Objection to form</p> <p>4 and foundation. Mischaracterizes her</p> <p>5 testimony.</p> <p>6 A. I didn't hire people.</p> <p>7 Q. I said met.</p> <p>8 A. I interviewed people for jobs for</p> <p>9 professional things and I am not aware of</p> <p>10 anyone aside from now Virginia who clearly</p> <p>11 was a masseuse aged 17 but that's, at least</p> <p>12 that's how far we know that I can think of</p> <p>13 that fulfilled any professional capacity for</p> <p>14 Jeffrey.</p> <p>15 Q. List all the people under the age</p> <p>16 of 18 that you interacted with at any of</p> <p>17 Jeffrey's properties?</p> <p>18 A. I'm not aware of anybody that I</p> <p>19 interacted with, other than obviously</p> <p>20 Virginia who was 17 at this point?</p> <p>21 (Maxwell Exhibit 21, email, marked</p> <p>22 for identification.)</p> <p>23 Q. I'm showing you what's been marked</p> <p>24 as Maxwell 21, it's an email dated January</p> <p>25 21, 2015 from Jeffrey to you. Is that, you</p>
<p style="text-align: right;">Page 383</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. List all of the girls you met and</p> <p>3 brought to Jeffrey Epstein's home for the</p> <p>4 purposes of employment that were under the</p> <p>5 age of 18?</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation.</p> <p>8 A. I've already characterized my job</p> <p>9 was to find people, adults, professional</p> <p>10 people to do the jobs I listed before; pool</p> <p>11 person, secretary, house person, chef, pilot,</p> <p>12 architect.</p> <p>13 Q. I'm asking about individuals under</p> <p>14 the age of 18, not adult persons, people</p> <p>15 under the age of 18.</p> <p>16 A. I looked for people or tried to</p> <p>17 find people to fill professional jobs in</p> <p>18 professional situations.</p> <p>19 Q. So Virginia Roberts was under the</p> <p>20 age of 18, correct?</p> <p>21 A. I think we've established that</p> <p>22 Virginia was 17.</p> <p>23 Q. Is she the -- sorry, go ahead.</p> <p>24 Is she the only individual that you</p> <p>25 met for purposes of hiring someone for</p>	<p style="text-align: right;">Page 385</p> <p>1 G Maxwell - Confidential</p> <p>2 can take a moment to take a look at it, is</p> <p>3 that a statement that Jeffrey Epstein wrote</p> <p>4 for you to be issued to the press?</p> <p>5 MR. PAGLIUCA: Objection to the</p> <p>6 form and foundation.</p> <p>7 A. The question was?</p> <p>8 Q. Is this a statement that Jeffrey</p> <p>9 Epstein wrote for you to be issued to the</p> <p>10 press?</p> <p>11 MR. PAGLIUCA: Same objection.</p> <p>12 A. Is there any other emails that you</p> <p>13 have that surround this that would allow me</p> <p>14 to know what -- does this have a context?</p> <p>15 Q. These were produced by your counsel</p> <p>16 so the to extent there are emails that</p> <p>17 surround this, this is what we were given.</p> <p>18 A. Okay. I don't know whether he</p> <p>19 wrote this -- obviously he wrote this and</p> <p>20 sent this to me. I don't know if this is</p> <p>21 post a phone call we had, I can't recollect</p> <p>22 exactly.</p> <p>23 Q. Do you know if this was issued to</p> <p>24 the press, this statement?</p> <p>25 A. The only press statement that was</p>



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1 G Maxwell - Confidential  
 2 issued is the one that you have.  
 3 Q. When the paragraph refers to you  
 4 being in a very long term committed  
 5 relationship with another man, who was that  
 6 other man?  
 7 MR. PAGLIUCA: You don't have to  
 8 answer the question.  
 9 MS. McCAWLEY: I'm asking the  
 10 identity of a witness in a statement she  
 11 is giving.  
 12 MR. PAGLIUCA: She didn't give the  
 13 statement.  
 14 MS. McCAWLEY: Jeffrey is writing  
 15 to her, I'm asking who is he is  
 16 referencing to a long term relationship.  
 17 You are going to refuse to let her  
 18 answer that question.  
 19 MR. PAGLIUCA: Yes.  
 20 MS. McCAWLEY: I would like to  
 21 state for the record he is refusing to  
 22 allow her to identify a potential  
 23 witness in this litigation. So we will  
 24 be back to get the answer to that  
 25 question.

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1 G Maxwell - Confidential  
 2 Q. Do you recall when you were  
 3 traveling with Virginia Roberts that you  
 4 would be responsible for holding her  
 5 passport?  
 6 MR. PAGLIUCA: Objection to the  
 7 form and foundation.  
 8 A. I already testified I don't recall  
 9 traveling with Virginia.  
 10 Q. Do you recall whether Jeffrey  
 11 Epstein when he was traveling with a minor,  
 12 someone under the age of 18, someone would  
 13 hold their passport?  
 14 MR. PAGLIUCA: Object to the form.  
 15 A. I couldn't testify to what Jeffrey  
 16 did or didn't do.  
 17 Q. You never observed him gathering a  
 18 minor's passport and holding it during one of  
 19 the trips you were on?  
 20 A. I don't have a recollection of  
 21 that.  
 22 Q. Are you familiar with a company  
 23 called Hyperion Air Inc.?  
 24 A. I am.  
 25 Q. Is that a company you are

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1 G Maxwell - Confidential  
 2 affiliated with?  
 3 A. No.  
 4 Q. Is that a company that Jeffrey  
 5 owns?  
 6 A. I knew it back in 2001, back when I  
 7 was working. I have no idea what that is  
 8 today.  
 9 Q. What about JEJE, are you familiar  
 10 with that company, JEJE Inc.?  
 11 A. I don't recall it.  
 12 Q. You don't recall?  
 13 A. It vaguely rings a bell. I don't  
 14 remember what it relates to.  
 15 Q. What about J Epstein Virgin Islands  
 16 Foundation, Inc.  
 17 Are you familiar with that company?  
 18 A. No.  
 19 Q. How did J Epstein & Company, Inc.?  
 20 A. Again, I don't recall his business  
 21 names and affiliations.  
 22 Q. How about NES LLC, are you familiar  
 23 with that name?  
 24 A. Again, I think that was one of his  
 25 businesses, but I don't recall.

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1 G Maxwell - Confidential  
 2 Q. Do you know what that business did?  
 3 A. I don't.  
 4 Q. How about New York Strategy Group  
 5 Inc.?  
 6 A. I don't know.  
 7 Q. What about Ghislaine Maxwell  
 8 Company, are you familiar with that company?  
 9 A. I never heard of that.  
 10 Q. Is that a company you are on record  
 11 as being either a board member of or having a  
 12 position of authority in?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I've never heard of the business.  
 16 Q. What negative, unflattering,  
 17 private or potentially embarrassing  
 18 information does Jeffrey Epstein know about  
 19 you?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I imagine none.  
 23 Q. Does he know, does he have any  
 24 knowledge of any illegal activity that you've  
 25 conducted?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Object to the form  
 3 and foundation.  
 4 A. If you want to ask Jeffrey  
 5 questions about me, you would have to ask  
 6 him.  
 7 Q. Have you ever been involved in any  
 8 illegal activity in your lifetime?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I can't think of anything I have  
 12 done that is illegal.  
 13 Q. Have you ever been arrested?  
 14 A. I have a DUI in the U.K. a long  
 15 time ago.  
 16 Q. Is that the only arrest you have on  
 17 your record?  
 18 A. Yes.  
 19 Q. I will mark as Maxwell 22 this  
 20 email?  
 21 (Maxwell Exhibit 22, email, marked  
 22 for identification.)  
 23 Q. This is dated January 21, 2015.  
 24 It's from Jeffrey Epstein to you, forwarding  
 25 the Guardian and I would like you to look at

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1 G Maxwell - Confidential  
 2 the chain of emails so you understand the --  
 3 have an appreciation for who is on this.  
 4 It's a three-page document. The bottom of  
 5 the email appears to be a message from, there  
 6 is a -- at the very bottom there is the  
 7 signature block for Ross Gow, who I  
 8 understand is your press agent and above that  
 9 there is a message from a John Swaine to Ross  
 10 Gow.  
 11 Do you see that?  
 12 A. Uh-huh.  
 13 Q. Do you know who John Swaine is?  
 14 A. I do not.  
 15 Q. Above that there is a message from  
 16 Ross Gow to Philip Barden and you and it  
 17 says, so this isn't getting better, latest  
 18 from our chums at the Guardian and above that  
 19 you will see on January 21 an email from you  
 20 where you wrote, See below.  
 21 And right above that chain you will  
 22 see Jeffrey Epstein to you on January 21 and  
 23 his statement to you is, This will now end  
 24 but I think a dismissive statement is okay.  
 25 What did he mean by his statement,

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1 G Maxwell - Confidential  
 2 This will now end?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. I have no idea.  
 6 Q. Did you discuss with him what he  
 7 meant by the statement, This will now end?  
 8 A. I don't recall.  
 9 Q. Was he taking any action to ensure  
 10 that, quote, this will now end?  
 11 A. I have no idea.  
 12 (Maxwell Exhibit 23, email, marked  
 13 for identification.)  
 14 Q. This is an email from, if you look  
 15 at the chain at the top, you will see it's  
 16 from you to Jeffrey on January 27 and the  
 17 email at the bottom of the chain is from  
 18 Jeffrey to you on January 27.  
 19 He states, What happened to you and  
 20 your statement, question mark, question mark.  
 21 And you put at the top, I have not decided  
 22 what to do.  
 23 A. Uh-huh.  
 24 Q. Why was Jeffrey interested in you  
 25 making a statement to the press?

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I don't know that he was  
 5 interested. We made a statement and then I  
 6 was being advised to make an additional  
 7 statement and I never did.  
 8 Q. Was Jeffrey communicating with you  
 9 regularly on what additional statement you  
 10 might make?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. No, I've communicated with him very  
 14 little, as little as possible.  
 15 Q. Why did you feel you had to keep  
 16 him informed of statements you were making to  
 17 the press?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I didn't feel I had to.  
 21 Q. Then why you were communicating  
 22 with him about statements you were making to  
 23 the press?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

<p style="text-align: right;">Page 394</p> <p>1 G Maxwell - Confidential</p> <p>2 A. Insofar as this is the case, it's</p> <p>3 really all about Jeffrey, it's not a case</p> <p>4 about me.</p> <p>5 Q. In 2009, did you direct your</p> <p>6 lawyer, either directly or indirectly, to</p> <p>7 tell Brad Edwards that you were unavailable</p> <p>8 to attend a deposition?</p> <p>9 MR. PAGLIUCA: Objection to the</p> <p>10 form and foundation. And this is a</p> <p>11 privileged communication as I understand</p> <p>12 the question, what someone said or</p> <p>13 didn't say to their lawyer. So don't</p> <p>14 answer the question.</p> <p>15 Q. Can you answer that question</p> <p>16 without revealing a privileged communication?</p> <p>17 A. Can you ask the question again?</p> <p>18 Q. In 2009, did you direct your lawyer</p> <p>19 to tell Brad Edwards that you were</p> <p>20 unavailable to attend a deposition?</p> <p>21 MR. PAGLIUCA: Same instruction.</p> <p>22 Q. Did you make any statement in 2009</p> <p>23 to anybody that you were unavailable to</p> <p>24 attend a deposition?</p> <p>25 A. My mother was sick and I don't</p>	<p style="text-align: right;">Page 396</p> <p>1 G Maxwell - Confidential</p> <p>2 A. I don't think I've ever discussed</p> <p>3 it with him.</p> <p>4 Q. How did you come to learn that</p> <p>5 Sarah Kellen was covered by the</p> <p>6 nonprosecution agreement?</p> <p>7 A. I believe I read it in the press.</p> <p>8 Q. Did you have any discussions with</p> <p>9 Sarah Kellen with about the nonprosecution</p> <p>10 agreement?</p> <p>11 A. I have not had any discussions with</p> <p>12 Sarah.</p> <p>13 Q. When is the last time you spoke to</p> <p>14 Sarah Kellen?</p> <p>15 A. Maybe 2005, 2006 maybe.</p> <p>16 Q. And same with Nadia Marcinkova,</p> <p>17 when is the last time you recall speaking</p> <p>18 with Nadia Marcinkova?</p> <p>19 A. Probably even more time before</p> <p>20 that, maybe -- I've never had communications</p> <p>21 really with Nadia.</p> <p>22 Q. I'm sorry, I didn't hear that.</p> <p>23 A. I never had communications with</p> <p>24 her.</p> <p>25 Q. You were working for Jeffrey at the</p>
<p style="text-align: right;">Page 395</p> <p>1 G Maxwell - Confidential</p> <p>2 recall exactly the sequence of events but</p> <p>3 what sequence of events do exist are -- was</p> <p>4 handled by my lawyers.</p> <p>5 Q. What is your understanding of</p> <p>6 Jeffrey Epstein's nonprosecution agreement?</p> <p>7 A. I have no idea.</p> <p>8 Q. Do you have an understanding of the</p> <p>9 co-conspirators listed in the nonprosecution</p> <p>10 agreement?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. I have no knowledge of his</p> <p>14 agreement, whatever that is.</p> <p>15 Q. Do you know, you mentioned earlier</p> <p>16 today that Sarah Kellen was one of the listed</p> <p>17 co-conspirators.</p> <p>18 Do you know who the other</p> <p>19 co-conspirators are in the nonprosecution</p> <p>20 agreement?</p> <p>21 MR. PAGLIUCA: Objection to the</p> <p>22 form and foundation.</p> <p>23 A. I do not know.</p> <p>24 Q. What did Jeffrey Epstein tell you</p> <p>25 about the nonprosecution agreement?</p>	<p style="text-align: right;">Page 397</p> <p>1 G Maxwell - Confidential</p> <p>2 same time Nadia was also working for Jeffrey,</p> <p>3 isn't that correct?</p> <p>4 A. I didn't know what Nadia did for</p> <p>5 Jeffrey so I didn't characterize what her</p> <p>6 relationship or work or not was and I was</p> <p>7 still helping him with his construction</p> <p>8 projects and the like but I never crossed</p> <p>9 paths with Nadia.</p> <p>10 Q. What did you think Nadia was doing</p> <p>11 for Jeffrey?</p> <p>12 A. I have no idea what Nadia was doing</p> <p>13 for Jeffrey.</p> <p>14 Q. Did you observe Nadia at any of</p> <p>15 Jeffrey's houses while you were there?</p> <p>16 A. She was at the house on occasion.</p> <p>17 Q. What would she be doing there?</p> <p>18 A. I have no idea.</p> <p>19 Q. Did you know if she lived at his</p> <p>20 houses?</p> <p>21 A. I have no idea.</p> <p>22 Q. Did you ever go into a bedroom and</p> <p>23 see her belongings at one of the houses?</p> <p>24 A. Not that I recall, no.</p> <p>25 Q. I'm going to mark this as Maxwell</p>

<p style="text-align: right;">Page 398</p> <p>1 G Maxwell - Confidential</p> <p>2 Exhibit 24?</p> <p>3 (Maxwell Exhibit 24, email, marked</p> <p>4 for identification.)</p> <p>5 Q. You can see at the top of the first</p> <p>6 page which is GM 0001, it's dated January 3,</p> <p>7 2015 from you to the Duke of York.</p> <p>8 Is that Prince Andrew who we</p> <p>9 referred to today?</p> <p>10 A. Yes.</p> <p>11 Q. And can you tell me, it says, Have</p> <p>12 some info. Call me when you have a moment.</p> <p>13 What is redacted there?</p> <p>14 A. I don't recall, I'm sorry.</p> <p>15 Q. Do you know why there is a</p> <p>16 redaction on this document?</p> <p>17 A. You would have to confer with my</p> <p>18 lawyers.</p> <p>19 Q. What did you discuss on that call?</p> <p>20 A. I don't have any specific knowledge</p> <p>21 of that call.</p> <p>22 Q. So the call is being made on</p> <p>23 Saturday, January 3, 2015?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p>	<p style="text-align: right;">Page 400</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. What did you talk about?</p> <p>3 A. Just what a liar she is.</p> <p>4 Q. What did he say to you?</p> <p>5 A. What a liar she is.</p> <p>6 Q. Did he tell you why he thought she</p> <p>7 was a liar?</p> <p>8 A. I don't think he told me why she</p> <p>9 was a liar. The substance of everything that</p> <p>10 she said was a lie with regard to him.</p> <p>11 Q. What did you say to him?</p> <p>12 A. She is a liar.</p> <p>13 Q. That was the whole conversation, it</p> <p>14 was you said to him, she is a liar and he</p> <p>15 said to you she say liar and did you discuss</p> <p>16 any of the details about what those lies</p> <p>17 were?</p> <p>18 A. I don't recollect.</p> <p>19 Q. Was that only one conversation you</p> <p>20 had?</p> <p>21 A. I don't recollect. I don't</p> <p>22 recollect actually the conversation but other</p> <p>23 than -- in detail other than we both said she</p> <p>24 was a liar.</p> <p>25 Q. Do you regularly communicate with</p>
<p style="text-align: right;">Page 399</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. The document states, it's Saturday</p> <p>3 January 3, 2015. You issued your press</p> <p>4 release on January 2, 2015.</p> <p>5 Were you discussing with Prince</p> <p>6 Andrew the subject of Virginia Roberts during</p> <p>7 these calls?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. I don't know if I spoke to him.</p> <p>11 Q. I would like you to turn to GM 0002</p> <p>12 and the bottom chain says Duke of York,</p> <p>13 Saturday January 3, to [REDACTED] re, and he says</p> <p>14 let me know when we can talk. Got some</p> <p>15 specific questions to ask you about Virginia</p> <p>16 Roberts.</p> <p>17 Do you recall having a conversation</p> <p>18 with Prince Andrew about Virginia Roberts in</p> <p>19 or around early January of 2015?</p> <p>20 A. I don't know if we actually spoke.</p> <p>21 Q. Did you ever speak to Prince Andrew</p> <p>22 about Virginia Roberts after you issued your</p> <p>23 statement on January 2, 2015?</p> <p>24 A. I know that we did speak at some</p> <p>25 point but I don't recollect when we spoke.</p>	<p style="text-align: right;">Page 401</p> <p>1 G Maxwell - Confidential</p> <p>2 Prince Andrew?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. What do you mean by regularly.</p> <p>6 Q. Do you email with him once a month,</p> <p>7 once every two months or text him or call</p> <p>8 him?</p> <p>9 A. No, we are not in that type of</p> <p>10 regular touch.</p> <p>11 Q. Do you travel with him regularly?</p> <p>12 A. I don't know, I have traveled with</p> <p>13 him. We have traveled together but regularly</p> <p>14 is not a correct characterization.</p> <p>15 Q. Do you travel with him more than</p> <p>16 once a year?</p> <p>17 A. There is no standard. There is no</p> <p>18 set pattern. The answer to that was no.</p> <p>19 Q. Have you ever observed him with any</p> <p>20 underage, any women, female under the age of</p> <p>21 18, interacting, that's not a child or a</p> <p>22 family friend, interacting for the purposes</p> <p>23 of a sexual relationship with that</p> <p>24 individual?</p> <p>25 MR. PAGLIUCA: Objection to the</p>



<p style="text-align: right;">Page 402</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 A. I've never seen Andrew interact in</p> <p>4 any way of that nature.</p> <p>5 Q. Have you ever gone to dinner with</p> <p>6 him with any individual under the age of 18</p> <p>7 that's not a family member or friend of yours</p> <p>8 that is under the age of 18?</p> <p>9 MR. PAGLIUCA: Objection to form</p> <p>10 and foundation.</p> <p>11 A. We've been to dinner all the time,</p> <p>12 I am not not sure who is at dinner with us, I</p> <p>13 can't testify to that.</p> <p>14 Q. Has he ever brought a female under</p> <p>15 the age 18 that's not a relative of his --</p> <p>16 A. He has children.</p> <p>17 Q. I said not relatives.</p> <p>18 A. I can't possibly testify to who he</p> <p>19 comes to dinner with, I wouldn't recall.</p> <p>20 Q. To your knowledge, has he ever had</p> <p>21 a relationship with any female under the age</p> <p>22 of 18 for purposes of a romantic relationship</p> <p>23 to your knowledge?</p> <p>24 A. I can't testify to Andrew's</p> <p>25 relationship.</p>	<p style="text-align: right;">Page 404</p> <p>1 G Maxwell - Confidential</p> <p>2 form and foundation.</p> <p>3 A. I mean I've been to his -- in the</p> <p>4 mid '90s, I would have communicated with</p> <p>5 people who worked for him.</p> <p>6 Q. Have you communicated with Leslie</p> <p>7 Wexner about this case?</p> <p>8 A. No.</p> <p>9 Q. Have you ever seen a topless female</p> <p>10 at any one of Jeffrey Epstein's properties?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation. You've asked this</p> <p>13 question, by the way, earlier on today.</p> <p>14 A. Again, I testified that there are</p> <p>15 people who from time to time in the privacy</p> <p>16 of a swimming pool have maybe taken a bikini</p> <p>17 top off or something but it's not common and</p> <p>18 certainly when I was at the house I don't</p> <p>19 really recollect seeing that kind of</p> <p>20 activity.</p> <p>21 Q. Have you ever smoked cigarettes?</p> <p>22 A. Yes.</p> <p>23 Q. Have you ever smoked cigarettes</p> <p>24 with Virginia Roberts?</p> <p>25 A. I don't recall smoking cigarettes</p>
<p style="text-align: right;">Page 403</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. You haven't observed that?</p> <p>3 A. No.</p> <p>4 Q. Have you talked to Prince Andrew</p> <p>5 about coming to testify at trial in this</p> <p>6 case?</p> <p>7 A. No.</p> <p>8 Q. When was the last time you</p> <p>9 communicated with Leslie Wexner?</p> <p>10 A. 1994, 1995.</p> <p>11 Q. I believe earlier, did you say that</p> <p>12 you -- when is the last time you've been to</p> <p>13 his home in Ohio?</p> <p>14 A. I said -- you asked me if I stayed</p> <p>15 the night.</p> <p>16 Q. I'm asking you a different</p> <p>17 question. When is the last time you have</p> <p>18 been to his home in Ohio?</p> <p>19 A. Roughly the same time, in the</p> <p>20 middle of the '90s sometime, mid '90s.</p> <p>21 Q. Not in the years 2000 to 2002?</p> <p>22 A. Mid '90s.</p> <p>23 Q. Have you ever communicated with any</p> <p>24 representative of Leslie Wexner?</p> <p>25 MR. PAGLIUCA: Objection to the</p>	<p style="text-align: right;">Page 405</p> <p>1 G Maxwell - Confidential</p> <p>2 with Virginia Roberts.</p> <p>3 Q. I'm marking this as Maxwell 25.</p> <p>4 (Maxwell Exhibit 25, email, marked</p> <p>5 for identification.)</p> <p>6 Q. I'm showing you what has been</p> <p>7 marked as Maxwell 25.</p> <p>8 This is an email dated January 11,</p> <p>9 2015 at the top?</p> <p>10 Do you see that that from Jeffrey</p> <p>11 to you?</p> <p>12 A. Uh-huh.</p> <p>13 Q. And then below there is an email</p> <p>14 from Philip Barden to you and cc'ing Ross Gow</p> <p>15 on January 11, 2015.</p> <p>16 Do you see that?</p> <p>17 A. Uh-huh.</p> <p>18 Q. It says, Dear Ghislaine, as you</p> <p>19 know I have been working behind the scenes</p> <p>20 and this article comes from that. It helps</p> <p>21 but doesn't answer the VR claims. I will get</p> <p>22 the criminal allegations out. This shows the</p> <p>23 MOS will print truth, not just a VR voice</p> <p>24 piece. We can only make the truth by making</p> <p>25 a statement.</p>

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1 G Maxwell - Confidential  
 2 What did he mean when he said, I  
 3 will get the criminal allegations out, what  
 4 was he referring to?  
 5 MR. PAGLIUCA: Objection to the  
 6 form and foundation.  
 7 A. I have no idea.  
 8 Q. Were there criminal allegations  
 9 about Virginia that either your lawyer or  
 10 press agent were leaking to the press?  
 11 MR. PAGLIUCA: Objection to form  
 12 and foundation.  
 13 A. I have no idea.  
 14 Q. Did you ask him what he meant when  
 15 he said, I will get the criminal allegations  
 16 out?  
 17 A. I don't recollect the conversation.  
 18 Q. Did you direct him to leak to the  
 19 press criminal allegations about Virginia  
 20 Roberts?  
 21 A. I already testified that I have no  
 22 knowledge of what you are asking me.  
 23 Q. Were you copied on this email,  
 24 correct?  
 25 A. I was.

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1 G Maxwell - Confidential  
 2 Q. Did Jeffrey Epstein assist in  
 3 obtaining information about criminal  
 4 allegations relating to Virginia Roberts?  
 5 MR. PAGLIUCA: Objection to form  
 6 and foundation.  
 7 A. I have no recollection.  
 8 Q. Did Alan Dershowitz assist in  
 9 obtaining information regarding criminal  
 10 allegations of Virginia Roberts?  
 11 MR. PAGLIUCA: Objection to form  
 12 and foundation.  
 13 A. I have no knowledge of that.  
 14 Q. Did you ever discuss that with Alan  
 15 Dershowitz?  
 16 A. Discuss what?  
 17 Q. Criminal allegations about Virginia  
 18 Roberts.  
 19 A. I don't believe I have.  
 20 Q. Have you ever discussed allegations  
 21 relating to --  
 22 Q. Do you know if Jeffrey Epstein had  
 23 any relationship with the U.S. government  
 24 either working for the CIA or the FBI in his  
 25 lifetime?

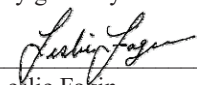

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1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: Objection to the  
 3 form and foundation.  
 4 A. I have no knowledge of that.  
 5 Q. Do you know if Jeffrey Epstein has  
 6 any friends that are in the CIA or FBI?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I have no idea.  
 10 Q. Are you aware of an investigation  
 11 of Jeffrey Epstein in the early '80s relating  
 12 to the SEC?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I have no knowledge of that.  
 16 Q. Are you aware that Jeffrey Epstein  
 17 has told people that he worked for the  
 18 government to recover stolen funds?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I don't recall conversations about  
 22 that.  
 23 Q. Has he ever told that you he worked  
 24 for the U.S. government?  
 25 A. I don't recollect that.

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1 G Maxwell - Confidential  
 2 Q. You don't recollect or has he never  
 3 told you that?  
 4 A. I have no knowledge, I don't  
 5 recollect him telling me he worked for the  
 6 government.  
 7 Q. Does Jeffrey Epstein have any  
 8 affiliation with the Israeli government?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation.  
 11 A. I have no knowledge of that.  
 12 Q. Do you know if he ever performed  
 13 any work for the Israeli government?  
 14 A. I have no knowledge of that.  
 15 Q. Have you ever visited Israel with  
 16 Jeffrey Epstein?  
 17 A. I'm sorry, I don't recollect.  
 18 Q. You've seen the flight logs that I  
 19 provided you today. Are there, during the  
 20 time you worked for Jeffrey Epstein, were  
 21 there times that you flew on commercial  
 22 flights rather than Jeffrey Epstein's planes?  
 23 A. Yes.  
 24 Q. How often did that occur?  
 25 A. Decently.

<p style="text-align: right;">Page 410</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Were there other flights that you</p> <p>3 recall flying on with Jeffrey Epstein that</p> <p>4 were on flights that -- where Dave Rogers was</p> <p>5 not the pilot?</p> <p>6 A. Dave Rogers was not always the</p> <p>7 pilot.</p> <p>8 Q. How many planes did Jeffrey Epstein</p> <p>9 have during the time you were with him?</p> <p>10 MR. PAGLIUCA: Objection to the</p> <p>11 form and foundation.</p> <p>12 A. So you need to give me a date</p> <p>13 range.</p> <p>14 Q. During the time period of 1992</p> <p>15 through when you left your employment which I</p> <p>16 think you said was in 2009?</p> <p>17 A. So in the '90s he had one plane and</p> <p>18 at some point in the 2000s he had two planes</p> <p>19 but I can't testify to anything past 2002,</p> <p>20 2003, what happened to his planes after that.</p> <p>21 Q. Do you know what travel agency, if</p> <p>22 any, Jeffrey would use when he would send</p> <p>23 someone, for example, you or one of his other</p> <p>24 employees on a flight somewhere? Did he use</p> <p>25 a particular travel agency to make those</p>	<p style="text-align: right;">Page 412</p> <p>1 G Maxwell - Confidential</p> <p>2 there in the course of the work you were</p> <p>3 doing for Jeffrey?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 A. I was never sent. I had a job to</p> <p>7 do and I would have to go to New Mexico for</p> <p>8 work.</p> <p>9 Q. Would Sarah Kellen assist in that</p> <p>10 project?</p> <p>11 MR. PAGLIUCA: Objection to the</p> <p>12 form and foundation.</p> <p>13 A. No. The project was largely</p> <p>14 complete, largely complete by the end -- I</p> <p>15 don't remember the dates exactly but it was</p> <p>16 largely complete by the 1990s, 2000s.</p> <p>17 Q. Do you know why Sarah Kellen would</p> <p>18 be going to New Mexico to meet you?</p> <p>19 MR. PAGLIUCA: Objection to the</p> <p>20 form and foundation.</p> <p>21 A. I don't know. She worked for</p> <p>22 Jeffrey.</p> <p>23 MR. PAGLIUCA: I think we are out</p> <p>24 of time, counsel.</p> <p>25 THE VIDEOGRAPHER: It's true.</p>
<p style="text-align: right;">Page 411</p> <p>1 G Maxwell - Confidential</p> <p>2 arrangements?</p> <p>3 A. I don't recall.</p> <p>4 Q. Were you ever responsible for</p> <p>5 making those arrangements for other</p> <p>6 individuals?</p> <p>7 A. I don't recall making flight</p> <p>8 arrangements.</p> <p>9 Q. Was it a New York travel agent that</p> <p>10 you would use for those arrangements?</p> <p>11 A. Again, we are talking 16, 17, 18</p> <p>12 years. I just don't recall anything to do</p> <p>13 with travel agents.</p> <p>14 Q. Would Jeffrey Epstein ever fly, for</p> <p>15 example, Sarah Kellen on a commercial flight</p> <p>16 to meet you in New Mexico?</p> <p>17 MR. PAGLIUCA: Objection to the</p> <p>18 form and foundation.</p> <p>19 A. I can't testify to that.</p> <p>20 Q. Do you recall a trip where you met</p> <p>21 Sarah Kellen in New Mexico?</p> <p>22 A. No, I don't recall any specific</p> <p>23 trip, no.</p> <p>24 Q. Why would you be sent to New</p> <p>25 Mexico, is there a reason why you would go</p>	<p style="text-align: right;">Page 413</p> <p>1 G Maxwell - Confidential</p> <p>2 MS. McCAWLEY: I will state for the</p> <p>3 record there were questions today that</p> <p>4 remain unanswered because the witness</p> <p>5 has been instructed not to answer those</p> <p>6 questions and we will be raising our</p> <p>7 objections with the court to be able to</p> <p>8 have those questions answered in the</p> <p>9 near future.</p> <p>10 MR. PAGLIUCA: So we are clear, we</p> <p>11 are designating this entire deposition</p> <p>12 as confidential under the protective</p> <p>13 order. That would cover the paralegal</p> <p>14 whose been present as well as the court</p> <p>15 reporter and the videographer and all</p> <p>16 the lawyers in the room.</p> <p>17 THE VIDEOGRAPHER: This concludes</p> <p>18 today's proceedings. We are off the</p> <p>19 record at 6:43 p.m.</p> <p>20 (Time noted: 6:43 p.m.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 414</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">--- INDEX ---</p> <p>GHISLAINE MAXWELL By Ms. McCawley</p> <p style="text-align: right;">PAGE 4</p> <p style="text-align: center;">--- EXHIBITS ---</p> <p>MAXWELL EXHIBIT</p> <p>Exhibit 1 police report 24 Exhibit 2 email 33 Exhibit 3 transcript 71 Exhibit 4 photo 109 Exhibit 5 photo 113 Exhibit 6 flight logs 117 Exhibit 7 photo 133 Exhibit 8 photo 143 Exhibit 9 message pad pages 147 Exhibit 10 email 209 Exhibit 11 photo 259 Exhibit 12 documents 263 Exhibit 13 documents 312</p>	<p style="text-align: right;">Page 416</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">CERTIFICATE</p> <p>I HEREBY CERTIFY that the witness, GHISLAINE MAXWELL, was duly sworn by me and that the deposition is a true record of the testimony given by the witness.</p> <p> Leslie Fagin, Registered Professional Reporter Dated: April 22, 2016</p> <p></p> <p>(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)</p>
<p style="text-align: right;">Page 415</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>MAXWELL EXHIBIT</p> <p>Exhibit 14 email 345 Exhibit 15 email 348 Exhibit 16 email 348 Exhibit 17 email 361 Exhibit 18 email 363 Exhibit 19 email 365 Exhibit 20 email 367 Exhibit 21 email 384 Exhibit 22 email 390 Exhibit 23 email 392 Exhibit 24 email 398 Exhibit 25 email 405</p>	<p style="text-align: right;">Page 417</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">ACKNOWLEDGMENT OF DEPONENT</p> <p>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.</p> <p>GHISLAINE MAXWELL                      DATE</p> <p>Subscribed and sworn to before me this _____ day of _____, 2016. My commission expires: _____</p> <p>Notary Public</p>