

## **EXHIBIT F**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x  
June 21, 2016  
9:17 a.m.

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

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

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. PAGLIUCA:

3 Q. Then there's a category, victim  
4 information, and then we have listed, I believe, a  
5 total of 17 individuals that the Palm Beach Police  
6 Department incident report lists as alleged victims  
7 in this case, correct?

8 A. Correct.

9 Q. And are you aware as to whether or not  
10 that list was supplemented after July 25th, 2006, in  
11 the investigative incident report?

12 A. I'm not sure if it was updated or not.

13 MR. PAGLIUCA: I don't know if we want to  
14 mark this or not. I can hand you what I  
15 believe to be a more recent, or I think you  
16 actually brought one with you --

17 THE WITNESS: I did.

18 MS. SCHULTZ: If you're talking about the  
19 document that he brought with him, I had it  
20 Bates labeled.

21 MR. PAGLIUCA: We can show him that. I  
22 think I have the same document here. And we  
23 can -- I guess we'll mark that as 11.

24

25

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2 (The referred-to document was marked by  
3 the court reporter for Identification as  
4 Deposition Exhibit 11.)

5 BY MR. PAGLIUCA:

6 Q. If you look at the -- is that what you're  
7 looking at?

8 MS. SCHULTZ: That's mine. I just wanted  
9 to make sure it's the same.

10 BY MR. PAGLIUCA:

11 Q. If you go into the third -- I think it's  
12 the third page of that document, we then end with VI  
13 17 Juno.

14 Do you see that?

15 A. Yes.

16 Q. So that would tell me that there were no  
17 individuals listed as additional victims as of the  
18 conclusion of your investigation in this case; is  
19 that correct?

20 MS. SCHULTZ: Object to form and  
21 foundation.

22 THE WITNESS: That's correct.

23 BY MR. PAGLIUCA:

24 Q. Okay. So let's stick with Exhibit 1, and  
25 let's go to Narrative No. 1, which is on page 11 of

1 JOSEPH RECAREY - CONFIDENTIAL

## 2 Exhibit 1. Are you with me?

3 A. Uh-huh.

4 Q. Okay. Again, this was information that  
5 was obtained by Detective Pagan, correct?

6                   A.     Correct.

7 Q. And it's true, is it not, that this  
8 alleged victim never claimed to have been recruited  
9 by Ghislaine Maxwell; true?

10 MS. SCHULTZ: Object to form and  
11 foundation.

12 THE WITNESS: Correct.

13 BY MR. PAGLIUCA:

14 Q. And this individual, alleged victim No. 1,  
15 never identified Ghislaine Maxwell as being at  
16 Mr. Epstein's house when she was there, correct?

17 MS. SCHULTZ: Object to form and  
18 foundation.

19 THE WITNESS: I don't believe so.

20 BY MR. PAGLIUCA:

21 Q. You don't believe so --

22 A. I don't believe so.

23 Q. That she ever identified Ghislaine Maxwell  
24 as being in the house?

25 A. Right.

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2 Q. Okay. She never -- this individual,  
3 victim No. 1, never claimed that Ghislaine Maxwell  
4 paid her any money, correct?

5 A. Correct.

6 Q. And this individual No. 1 never claimed  
7 that Ms. Maxwell instructed her what to wear,  
8 correct?

9 A. Right.

10 Q. This individual never claimed that  
11 Ghislaine Maxwell told her how to act, correct?

12 A. Correct.

13 Q. This individual never claimed to have met  
14 Ghislaine Maxwell ever, correct?

15 A. I don't believe so, no.

16 Q. This individual never claimed to even have  
17 spoken to Ghislaine Maxwell ever, correct?

18 A. I don't believe so, no.

19 Q. And when you say "I don't believe so, no,"  
20 that means my statement to you is correct; is that  
21 right?

22 MS. SCHULTZ: Object to form, foundation.

23 THE WITNESS: Well, you're saying "ever."  
24 I don't know if she's ever, ever spoken to --  
25

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2 BY MR. PAGLIUCA:

3 Q. To Detective Pagan.

4 A. Right. To my knowledge, I don't know,  
5 because Detective Pagan is the one who actually  
6 interviewed her. So I don't know to the answer of  
7 "ever." So not to my knowledge.

8 Q. Certainly, nothing in Exhibit 1, Narrative  
9 1 reflects that this individual ever met or talked  
10 to or spoke to Ghislaine Maxwell, right?

11 A. Right. Not to my knowledge.

12 Q. And, indeed, you would agree with me that  
13 if this individual claimed that Ms. Maxwell had  
14 something to do with the events listed in Narrative  
15 1, you would have folded up on it, as the  
16 investigating detective, right?

17 MS. SCHULTZ: Object to the form.

18 THE WITNESS: Either myself or Detective  
19 Pagan would have.

20 BY MR. PAGLIUCA:

21 Q. Sure. And when you got the case six  
22 months later, if there hadn't been follow-up, you  
23 would have followed up on it, right?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: Correct.

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2 A. Yes.

3 Q. And then you asked various individuals who  
4 was there when you went to Mr. Epstein's house,  
5 right?

6 A. Correct.

7 Q. And you then, to the best of your ability,  
8 recorded those answers, I take it, as to who was  
9 there, right?

10 A. Yes.

11 Q. And with regard to [REDACTED] she never said  
12 anything about Ghislaine Maxwell being at  
13 Mr. Epstein's house, did she?

14 MS. SCHULTZ: Object to form and  
15 foundation.

16 BY MR. PAGLIUCA:

17 Q. To you?

18 A. I don't believe she did.

19 Q. Okay. And if she did, it's likely that  
20 you would have recorded it, correct?

21 A. Correct, and it would be on the -- it  
22 would be on the tape.

23 Q. Right.

24 She never claimed, [REDACTED] that Ms. Maxwell  
25 paid her, right?

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2 MS. SCHULTZ: Object to form and  
3 foundation.

4 THE WITNESS: Correct.

5 BY MR. PAGLIUCA:

6 Q. She never claimed that -- █ never claimed  
7 that Ms. Maxwell instructed her about what to wear,  
8 correct?

9 MS. SCHULTZ: Object to the form.

10 THE WITNESS: Correct.

11 BY MR. PAGLIUCA:

12 Q. █ never claimed that Ms. Maxwell told her  
13 how to act at Mr. Epstein's house, correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: Correct.

16 BY MR. PAGLIUCA:

17 Q. █ never claimed to have met Ghislaine  
18 Maxwell anywhere, correct?

19 MS. SCHULTZ: Object to form.

20 THE WITNESS: I don't believe so, no.

21 BY MR. PAGLIUCA:

22 Q. Okay. If we go on to individual alleged  
23 victim No. 3, AY, the same question: AY never  
24 identified Ms. Maxwell as someone she knew or  
25 interacted with in any fashion, correct?

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2 MS. SCHULTZ: Object to form.

3 THE WITNESS: No.

4 BY MR. PAGLIUCA:

5 Q. No, she did not?

6 A. No, she did not.

7 Q. Okay. The same with individual No. 4,  
8 alleged victim FP: Again, FP never claimed to have  
9 met with Ms. Maxwell, correct?

10 MS. SCHULTZ: Object to form and  
11 foundation.

12 THE WITNESS: I don't believe so, no.

13 BY MR. PAGLIUCA:

14 Q. Okay. And FP never identified Ms. Maxwell  
15 as someone being at Mr. Epstein's house, correct?

16 MS. SCHULTZ: Object to form and  
17 foundation.

18 BY MR. PAGLIUCA:

19 Q. And if you need to look at your report --

20 A. No, I don't -- I don't believe so. The  
21 only people that recalled Ghislaine at the house  
22 was --

23 Q. Sjoberg?

24 A. Johanna Sjoberg.

25 Q. Who was over the age of 18, correct?

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2 MS. SCHULTZ: Object to form and  
3 foundation.

4 THE WITNESS: And Venero, Christina  
5 Venero.

6 BY MR. PAGLIUCA:

7 Q. Who is an adult as well?

8 MS. O'CONNOR: Object to form.

9 THE WITNESS: Yes.

10 BY MR. PAGLIUCA:

11 Q. So out of your entire report, the only two  
12 people who ever said anything about Ms. Maxwell were  
13 Ms. Sjoberg, who I believe was 23 when you  
14 interviewed her?

15 A. Right, but she was --

16 MS. SCHULTZ: Object to form and  
17 foundation.

18 THE WITNESS: She was -- she had worked  
19 there for quite some time, so you would have to  
20 back up, I think, a year or two.

21 BY MR. PAGLIUCA:

22 Q. She was an adult when she worked there?

23 A. Right. She was over the age of 18, right,  
24 let's put it that way.

25 Q. And she was not listed by you as a victim

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2 as part of this case, right?

3           A.    Correct, because it was between two  
4 consenting adults.

5 Q. Exactly.

6                           And so that's Ms. Sjoberg, and then the  
7 other individual, I think you said Bolero; is that  
8 right?

9                   A.     Venero, Christina Venero. She's a --

10 Q. Adult masseuse, correct?

11 A. Yes. I remember she had lots of tattoos.

12 Q. Tatts, right.

17 MS. SCHULTZ: Object to form and  
18 foundation.

19 THE WITNESS: I don't believe so. It  
20 would be on the tapes if they did.

21 BY MR. PAGLIUCA:

22 Q. Well, or it would be in your report,  
23 right?

24 MS. SCHULTZ: Object to form and  
25 foundation.

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2 A. Correct.

3 Q. And then Mr. Epstein is arrested and ends  
4 up pleading guilty and all of that, right?

5 MS. SCHULTZ: Object to form.

6 THE WITNESS: I think there was a  
7 non-prosecution agreement prepared between the  
8 Feds and some kind of agreement was made. But,  
9 yes, he did end up pleading guilty.

10 BY MR. PAGLIUCA:

11 Q. All right.

12 Now, based on the questions that were  
13 asked of you in the grand jury, it's fair to say  
14 that Ms. Maxwell was not a target of the grand  
15 jury's investigation, correct?

16 MS. SCHULTZ: Object to form and  
17 foundation.

18 THE WITNESS: Not based on the questions  
19 that the state was asking me, no, the state  
20 wasn't...

21 BY MR. PAGLIUCA:

22 Q. In fact, it's fair to say that you never  
23 said Ms. Maxwell's name in the grand jury, right?

24 MS. SCHULTZ: Object to form and  
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: No. Based on the questions  
3 that the state was asking, no.

4 BY MR. PAGLIUCA:

5 Q. Were you aware of who was being issued  
6 subpoenas by the grand jury?

7 A. No. But it wasn't the actual subpoena  
8 from the grand jury; it came from the State  
9 Attorney's Office.

10 Q. At the direction of the grand jury,  
11 though, right?

12 MS. SCHULTZ: Object to form and  
13 foundation.

14 THE WITNESS: I don't know. Again, I  
15 don't know.

16 BY MR. PAGLIUCA:

17 Q. I would like to talk a little bit about  
18 the surveillance that you initiated at Mr. Epstein's  
19 house, okay?

20 Can you tell me when the surveillance  
21 began?

22 A. It would have started under Detective  
23 Pagan and gone through --

24 Q. The entire investigation?

25 A. Pretty much trash pulls. We stopped the

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2 Q. And so these were video cameras?

3 A. Correct.

4 Q. And so whoever was coming and going,  
5 whenever -- an officer saw somebody coming or going,  
6 they would videotape that person; is that correct?

7 A. Or they would just leave the video  
8 rolling, time lapse.

9 Q. And did you have the opportunity to  
10 observe any of that video?

11 A. I did observe a couple, but the person who  
12 actually set it up would review it and then submit a  
13 supplement to the report.

14 Q. Okay. It's true that none of the video of  
15 the surveillance led to the identification of  
16 Ghislaine Maxwell as coming or leaving the house  
17 during the time of surveillance, correct?

18 MS. SCHULTZ: Object to form and  
19 foundation.

20 THE WITNESS: I don't know. I didn't see  
21 all of the video, so I can't -- I can't attest  
22 to that.

23 BY MR. PAGLIUCA:

24 Q. Okay. Did anybody report to you that  
25 Ms. Maxwell was seen coming or going?

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2 MS. SCHULTZ: Object to form, foundation.

3 THE WITNESS: I don't recall.

4 BY MR. PAGLIUCA:

5 Q. If someone had reported to you that  
6 Ms. Maxwell was seen coming or going, you would have  
7 recorded it in your Palm Beach Police Department  
8 incident report, Exhibit No. 1, correct?

9 MS. SCHULTZ: Object to form and  
10 foundation.

11 THE WITNESS: I would have told the  
12 officer who was conducting the surveillance or  
13 reviewing the video to document it in the  
14 supplements.

15 BY MR. PAGLIUCA:

16 Q. And there is no documentation in the  
17 supplement of Ms. Maxwell either coming or going  
18 from Mr. Epstein's house during this time frame,  
19 correct?

20 MS. SCHULTZ: Object to the form.

21 THE WITNESS: I don't believe so. I  
22 don't -- I don't -- I don't believe so.

23 BY MR. PAGLIUCA:

24 Q. And, again, so we're on the same page,  
25 when you say "I don't believe so," I interpret that

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2 as her name is not in here as someone who was  
3 incoming or going; am I correct in my  
4 interpretation?

5 MS. SCHULTZ: Object to form and  
6 foundation.

9 BY MR. PAGLIUCA:

10 Q. I'm just trying to understand what "I  
11 don't believe so" means, okay?

12                   A.     I don't -- I don't believe it's in the  
13 report, no.

14           Q.    Okay.  "I don't believe it's in the  
15  report" that she was ever seen coming or going,  
16  right?

17 A. Right, that's what I'm saying.

18 Q. All right. We're on the same page.

21 A. There were numerous trash pulls done.

22 There was trash pulls down under Detective Pagan and  
23 under my request.

24 Q. As I understand the trash pull protocol,  
25 you or someone at your direction or Detective

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. I don't believe clothing was seized.

3 Q. To your knowledge, did you seize any  
4 property belonging to Ghislaine Maxwell from the  
5 home?

6 MS. SCHULTZ: Object to form and  
7 foundation.

8 THE WITNESS: I'm not sure. Not to my  
9 knowledge.

10 BY MS. SCHULTZ:

11 Q. Okay. No one ever came to you and said,  
12 Could you please return these items to Ms. Maxwell,  
13 correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: No.

16 BY MS. SCHULTZ:

17 Q. All right.

18 You did that with Janush?

19 A. Yes, he had photos and --

20 Q. But nothing like that ever happened with  
21 Ms. Maxwell, correct?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: No.

24 BY MS. SCHULTZ:

25 Q. Ms. Maxwell was not present when you