

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

Page 1

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

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

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

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

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

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

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

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

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

<p style="text-align: right;">Page 34</p> <p>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</p>	<p style="text-align: right;">Page 36</p> <p>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</p>
<p style="text-align: right;">Page 35</p> <p>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.</p>	<p style="text-align: right;">Page 37</p> <p>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]    17       [REDACTED]    18       may have been in the house when Jeffrey was    19        in the house. I have no idea how old she    20        was.    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.</p>

Page 38

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]

Page 40

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 [REDACTED]  
 21 A. I do.  
 22 Q. How did you meet [REDACTED]  
 23 A. At some point she was a friend of  
 24 Jeffrey's and I recall meeting her at some  
 25 point.

Page 39

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]

Page 41

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?

<p style="text-align: right;">Page 42</p> <p>1        G Maxwell - Confidential  2        A. I don't recollect. I don't know if  3        I did.  4        Q. How many times have you flown on  5        Jeffrey Epstein's planes?  6        A. Too many times.  7        Q. More than 300?  8        A. I really couldn't tell you how  9        many.  10       Q. More than 400?  11       A. Again, I said I cannot tell you how  12       many, a lot.  13       Q. How many times with [REDACTED]  14       [REDACTED]  15       A. I already testified, I have no  16       idea.  17       Q. How old was [REDACTED] when  18       she first became involved with Jeffrey?  19       A. I have no idea.  20       Q. Was she 14?  21       MR. PAGLIUCA: Object to the form  22       and foundation.  23       A. I have no idea.  24       Q. Did she look like a child the first  25       time you met her?</p>	<p style="text-align: right;">Page 44</p> <p>1        G Maxwell - Confidential  2        evidence. The witness already testified  3        she doesn't remember.  4        Q. You can answer that question.  5        Did you ever ask her on the many  6        flights you were with her or the many times  7        you were with her at the house?  8        A. First of all, I don't know I was on  9        many flights with her, you are making stories  10       up again as usual. And secondly, if I was on  11       a flight with her, there would not be any  12       reason why I would ask her how old she was.  13       Q. You don't recollect having any  14       conversation with her about her age?  15       A. I already testified to that.  16       Q. Do you know what [REDACTED]  17       was hired to do for Jeffrey?  18       A. I already testified I didn't know  19       she was hired and I don't know that she did  20       anything. I don't know how to answer that  21       question.  22       Q. Was [REDACTED] at the house,  23       the Palm Beach house, when you were present  24       at that house?  25       MR. PAGLIUCA: Object to the</p>
<p style="text-align: right;">Page 43</p> <p>1        G Maxwell - Confidential  2        MR. PAGLIUCA: Object to the form  3        and foundation. Asked and answered.  4        Q. Did she look like a child the first  5        time you met [REDACTED]  6        A. I don't know what you mean if she  7        looked like a child.  8        Q. Did she look like she was under the  9        age of 18?  10       A. No.  11       Q. Did she look like she was under the  12        age of 16?  13       A. I just testified -- first of all, I  14        couldn't tell you how old she was, she didn't  15        like like a child, leave it at that.  16       Q. Did you know that she was a child?  17        MR. PAGLIUCA: Object to the form  18        and foundation.  19       A. I just answered I did not know how  20        old she was and she looked like an adult.  21       Q. In the times that you traveled with  22        her on Jeffrey Epstein's planes, did you ever  23        ask her how old she was?  24        MR. PAGLIUCA: Object to the form  25        and foundation. Assumes facts not in</p>	<p style="text-align: right;">Page 45</p> <p>1        G Maxwell - Confidential  2        foundation.  3        A. I have no recollection of her being  4        at the house at the same time as me.  5        Q. When did you first meet [REDACTED]  6        [REDACTED]  7        A. I already told you I don't recall.  8        Q. Do you recall anything about [REDACTED]  9        [REDACTED]  10       A. That she was tall and blond.  11       Q. Do you recall [REDACTED]  12       interacting with other females at the house?  13       A. No, I do not.  14       Q. Did you arrange to get a visa for  15        [REDACTED] to come into this country?  16        MR. PAGLIUCA: Object to the form  17        and foundation.  18       A. Absolutely not.  19       Q. Did Jeffrey arrange for a visa for  20        [REDACTED]  21        MR. PAGLIUCA: You need to give me  22        a break so I can interpose an objection.  23        Object to the form and foundation.  24        Q. You can answer.  25        A. What was the question?</p>

1 G Maxwell - Confidential  
 2 Q. Did Jeffrey arrange for a visa for  
 3 [REDACTED]  
 4 A. I don't know what Jeffrey did. I  
 5 cannot testify what Jeffrey did.  
 6 Q. Was [REDACTED] involved in sex with  
 7 Jeffrey and other girls?  
 8 MR. PAGLIUCA: Object to the form  
 9 and foundation.  
 10 Q. Girls under the age of 18?  
 11 MR. PAGLIUCA: Same objection.  
 12 A. I have no idea.  
 13 Q. Was [REDACTED] involved with sex with  
 14 Jeffrey and girls over the age of 18?  
 15 MR. PAGLIUCA: Same objection.  
 16 A. I have no idea.  
 17 Q. Did [REDACTED] recruit other girls for  
 18 sex with Jeffrey?  
 19 MR. PAGLIUCA: Object to the form  
 20 and foundation.  
 21 A. I have no idea.  
 22 Q. Do you still talk to [REDACTED]  
 23 A. No.  
 24 Q. [REDACTED]  
 25 A. I have no idea.

1 G Maxwell - Confidential  
 2 Jeffrey?  
 3 MR. PAGLIUCA: Object to the form  
 4 and foundation.  
 5 A. I don't know exactly the nature of  
 6 her relationship but she worked for him.  
 7 Q. What did she do?  
 8 MR. PAGLIUCA: Object to the form  
 9 and foundation.  
 10 A. At the time she when was with him I  
 11 believe she traveled with him and helped with  
 12 his travel arrangements.  
 13 Q. Did she bring girls to the house to  
 14 give massages to Jeffrey?  
 15 MR. PAGLIUCA: Object to the form  
 16 and foundation.  
 17 A. I don't know what [REDACTED] did.  
 18 Q. So you never observed [REDACTED]  
 19 bringing girls to the home to give massages  
 20 to Jeffrey?  
 21 MR. PAGLIUCA: Object to the form  
 22 and foundation.  
 23 A. I don't understand the question,  
 24 what did you mean bring?  
 25 Q. Did you ever observe [REDACTED]

1 G Maxwell - Confidential  
 2 [REDACTED]  
 3 [REDACTED]  
 4 A. I have no idea.  
 5 Q. Are you a pilot?  
 6 A. I am.  
 7 Q. Have you flown with [REDACTED]  
 8 A. I have.  
 9 Q. Have you flown with [REDACTED]  
 10 [REDACTED]  
 11 A. What do you mean by flown?  
 12 Q. Have you been on planes with her?  
 13 A. I already testified I don't recall  
 14 having her on a plane with me.  
 15 Q. Do you know [REDACTED]  
 16 A. I do.  
 17 Q. When did you first meet her?  
 18 A. I don't recall exact dates.  
 19 Q. Did you meet her with the purpose  
 20 of hiring her to work for Jeffrey or having  
 21 Jeffrey hire her?  
 22 MR. PAGLIUCA: Object to the form  
 23 and foundation.  
 24 A. No.  
 25 Q. What was her relationship with

1 G Maxwell - Confidential  
 2 inviting, bringing, walking anyone into the  
 3 home to give a massage for Jeffrey?  
 4 MR. PAGLIUCA: Object to the form  
 5 and foundation.  
 6 A. I don't recollect anything like  
 7 that.  
 8 Q. Are you aware that [REDACTED] was  
 9 a co-conspirator, named as a co-conspirator  
 10 in the case involving Jeffrey Epstein?  
 11 MR. PAGLIUCA: Object to the form  
 12 and foundation and also calls for a  
 13 legal conclusion.  
 14 MS. McCAWLEY I'm just asking if she  
 15 is aware of that.  
 16 A. I am aware.  
 17 Q. Who paid [REDACTED]  
 18 A. I have no idea.  
 19 Q. Did you ever arrange payment for  
 20 any of the employees at the home?  
 21 MR. PAGLIUCA: Object to the form.  
 22 A. What do you mean by arrange?  
 23 Q. Were you ever in charge or  
 24 responsible for paying individuals at the  
 25 home, that worked there?

<p style="text-align: right;">Page 50</p> <p>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</p>	<p style="text-align: right;">Page 52</p> <p>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</p>
<p style="text-align: right;">Page 51</p> <p>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</p>	<p style="text-align: right;">Page 53</p> <p>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.</p>

Page 54	Page 56
<p>1 G Maxwell - Confidential      2 A. I have.      3 Q. No, you haven't.      4 A. Yes, I have.      5 Q. You are refusing to answer the      6 question.      7 A. Let's move on.      8 Q. I'm in charge of the deposition. I      9 say when we move on and when we don't.      10 You are here to respond to my      11 questions. If you are refusing to answer the      12 court will bring you back for another      13 deposition to answer these questions.      14 Do you understand that?      15 MR. PAGLIUCA: You don't need to      16 threaten the witness.      17 MS. McCAWLEY: I'm not threatening      18 her. I'm making sure the record is      19 clear.      20 MR. PAGLIUCA: Certainly can you      21 apply to have someone come back and the      22 court may or may not have her come back      23 again.      24 Again, she is not answering      25 questions that relate to adult consent</p>	<p>1 G Maxwell - Confidential      2 sexual acts on her?      3 MR. PAGLIUCA: Object to the form      4 and foundation.      5 A. I have not heard that.      6 Q. How do you know [REDACTED]      7 [REDACTED]      8 Q. Was [REDACTED] under the age of      9 18?      10 MR. PAGLIUCA: Object to the form      11 and foundation.      12 A. I don't recall how old [REDACTED]      13 was.      14 Q. Did she tell police that Jeffrey      15 Epstein assaulted her sexually?      16 MR. PAGLIUCA: Object to the form      17 and foundation.      18 A. I never heard that.      19 Q. Did [REDACTED] recruit or bring      20 girls to the home that were under the age of      21 18?      22 MR. PAGLIUCA: Object to the form      23 and foundation and I think this has been      24 [REDACTED]</p>
Page 55	Page 57
<p>1 G Maxwell - Confidential      2 sex acts. Period. And that's the      3 instruction and we can take it up with      4 the court.      5 Q. Ms. Maxwell, are you aware of any      6 sexual acts with masseuses and Jeffrey      7 Epstein that were nonconsensual?      8 A. No.      9 Q. How do you know that?      10 A. All the time that I have been in      11 the house I have never seen, heard, nor      12 witnessed, nor have reported to me that any      13 activities took place, that people were in      14 distress, either reported to me by the staff      15 or anyone else. I base my answer based on      16 that.      17 Q. Are you familiar with a person by      18 the name of [REDACTED]      19 A. I am.      20 Q. Has [REDACTED] given a statement      21 to police about you performing sexual acts on      22 her?      23 A. I have not heard that.      24 Q. Has [REDACTED] given a statement      25 to police about Jeffrey Epstein performing</p>	<p>1 G Maxwell - Confidential      2 asked and answered already.      3 Q. You can answer the question.      4 A. I have no idea what [REDACTED]      5 did.      6 Q. You never observed [REDACTED]      7 with girls under the age of 18 at Jeffrey's      8 home?      9 MR. PAGLIUCA: Object to the form      10 and foundation.      11 A. The answer is no, I have no idea.      12 Q. Do you know [REDACTED]      13 A. I do.      14 Q. What is your relationship with      15 [REDACTED]      16 MR. PAGLIUCA: Object to the form.      17 A. What do you mean what is my      18 relationship.      19 Q. Are you friendly with him, how do      20 you know him?      21 A. He is the husband of [REDACTED]      22 Q. Is [REDACTED] one of your friends?      23 A. Yes.      24 Q. Did you ever send Virginia to      25 [REDACTED] to give him a</p>

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

<p style="text-align: right;">Page 62</p> <p>1 G Maxwell - Confidential  2 Anything that involves consensual  3 sex on your part, I'm instructing you  4 not to answer.  5 Q. Did you ever have sexual contact  6 with [REDACTED]  7 A. Again, she is an adult --  8 Q. I'm asking you, did you ever have  9 sexual contact with [REDACTED]  10 A. I've just been instructed not to  11 answer.  12 Q. On what basis?  13 A. You have to ask my lawyer.  14 Q. Did you ever have sexual contact  15 with [REDACTED] that was not consensual on  16 [REDACTED] part?  17 MR. PAGLIUCA: You can answer  18 nonconsensual.  19 A. I've never had nonconsensual sex  20 with anybody.  21 Q. Not [REDACTED]  22 MR. PAGLIUCA: Objection.  23 A. I just testified I never had  24 nonconsensual sex with anybody ever, at any  25 time, at anyplace, at any time, with anybody.</p>	<p style="text-align: right;">Page 64</p> <p>1 G Maxwell - Confidential  2 Q. Did you have sex with her?  3 MR. PAGLIUCA: This is the same  4 instruction about consensual or  5 nonconsensual.  6 Q. Was [REDACTED] under the age of 18 when  7 you hired her?  8 A. No. I didn't hire her, as I said,  9 Jeffrey did.  10 Q. Did [REDACTED] ever have sex with  11 Jeffrey?  12 MR. PAGLIUCA: Objection to the  13 form and foundation.  14 A. How would I know what somebody else  15 did.  16 Q. You weren't involved in the sex  17 between Jeffrey, [REDACTED] and yourself?  18 A. We already --  19 Q. Were you involved with sex between  20 Jeffrey, [REDACTED] and yourself?  21 MR. PAGLIUCA: Everyone is talking  22 over each other. You heard the  23 question.  24 Again, you know what the  25 instruction is. If there is any</p>
<p style="text-align: right;">Page 63</p> <p>1 G Maxwell - Confidential  2 Q. So if [REDACTED] were to testify that  3 she did not consent to a sexual act that you  4 participated in --  5 A. I just told you I have never ever  6 under any circumstances with anybody, at any  7 time, in anyplace, in any form had  8 nonconsensual relations with anybody.  9 Q. Did you introduce [REDACTED]  10 [REDACTED]  11 MR. PAGLIUCA: Objection to the  12 form and foundation.  13 A. I've, again, read that [REDACTED]  14 claimed that she met or that she said she met  15 [REDACTED]. I don't know if I was the one  16 who made the introduction or not.  17 Q. Do you know a female by the name of  18 [REDACTED]  19 A. I do.  20 Q. How do you know her?  21 A. [REDACTED].  22 Q. So she worked for you?  23 A. Yes.  24 Q. Did you hire her?  25 A. Again, Jeffrey hired people.</p>	<p style="text-align: right;">Page 65</p> <p>1 G Maxwell - Confidential  2 consensual issue involved, I instruct  3 you not to answer.  4 A. Moving on.  5 Q. So you are refusing to answer that  6 question?  7 A. I've been instructed by my lawyer.  8 Q. Did you ever have sex with Jeffrey,  9 [REDACTED], Virginia and yourself when Virginia was  10 underage?  11 A. Absolutely not.  12 MR. PAGLIUCA: We've been going for  13 about an hour. I would like to take a  14 five-minute break, please.  15 MS. McCAWLEY: I'm almost done.  16 MR. PAGLIUCA: You are not going to  17 allow a break.  18 MS. McCAWLEY: As soon as I get  19 through my line of questioning, which is  20 perfectly appropriate.  21 Q. Did [REDACTED] travel with you and  22 Jeffrey to Europe?  23 A. I'm sure she did.  24 Q. What is she doing today?  25 A. I have no idea.</p>

Page 66	Page 68
<p>1        G Maxwell - Confidential</p> <p>2        Q. Do you speak to her regularly now,</p> <p>3        do you speak to her?</p> <p>4        A. No.</p> <p>5        Q. Do you know where she lives?</p> <p>6        A. No.</p> <p>7        Q. Do you know what country she lives</p> <p>8        in?</p> <p>9        A. No.</p> <p>10       Q. Where is the last place you knew</p> <p>11       that she lived?</p> <p>12       A. Last place I knew for sure was in</p> <p>13       Los Angeles.</p> <p>14       Q. When did she stop working for you?</p> <p>15       A. 2001, 2002.</p> <p>16       Q. What tasks did she performance for</p> <p>17       you?</p> <p>18       A. She helped me with moving in and</p> <p>19       out of houses, construction, she was a</p> <p>20       general help, she helped with buying things</p> <p>21       that needed to be purchased, if I needed her</p> <p>22       to stand in for me during meetings, it was a</p> <p>23       very wide ranging job.</p> <p>24       Q. Did she ever bring females to</p> <p>25       perform massages for Jeffrey?</p>	<p>1        G Maxwell - Confidential</p> <p>2        We are back on the record and starting</p> <p>3        disk No. 2.</p> <p>4        Q. Ms. Maxwell, I asked you about</p> <p>5        Virginia Roberts earlier.</p> <p>6        Can you describe what Virginia</p> <p>7        Roberts' duties were when she was with Mr.</p> <p>8        Epstein?</p> <p>9        MR. PAGLIUCA: Objection to the</p> <p>10       form and foundation.</p> <p>11       A. I believe that Virginia was a</p> <p>12       masseuse.</p> <p>13       Q. Was Virginia required to dress up</p> <p>14       in any way for massages?</p> <p>15       MR. PAGLIUCA: Objection to the</p> <p>16       form and foundation.</p> <p>17       A. I have no idea.</p> <p>18       Q. Did you provide Virginia with</p> <p>19       outfits to wear for certain massages?</p> <p>20       A. I have no idea what you are talking</p> <p>21       about.</p> <p>22       Q. For example, did you ever provide</p> <p>23       Virginia with a school girl outfit to wear</p> <p>24       for a massage?</p> <p>25       A. I have no idea what you are talking</p>
Page 67	Page 69
<p>1        G Maxwell - Confidential</p> <p>2        MR. PAGLIUCA: Objection to the</p> <p>3        form and foundation.</p> <p>4        A. What are you asking me?</p> <p>5        Q. Did [REDACTED], was it ever [REDACTED]</p> <p>6        responsibility to bring females to the house</p> <p>7        for the purposes of massaging Jeffrey?</p> <p>8        A. [REDACTED] job was to help me with the</p> <p>9        houses and work in homes. It was not her job</p> <p>10       to whatever you just said, bring masseuses.</p> <p>11       Q. Did she do that?</p> <p>12       A. I have no recollection. I have no</p> <p>13       idea.</p> <p>14       Q. Did you pay [REDACTED] or did Jeffrey pay</p> <p>15       her?</p> <p>16       A. Jeffrey.</p> <p>17       Q. Do you recall how much she was</p> <p>18       paid?</p> <p>19       A. I do not.</p> <p>20       MS. McCAWLEY: I think we can take</p> <p>21       a break now.</p> <p>22       THE VIDEOGRAPHER: It's 10:02 and</p> <p>23       we are off the record.</p> <p>24       (Recess.)</p> <p>25       THE VIDEOGRAPHER: It's now 10:18.</p>	<p>1        G Maxwell - Confidential</p> <p>2        about.</p> <p>3        Q. So you didn't provide her with</p> <p>4        that?</p> <p>5        A. As I just testified, I have no idea</p> <p>6        what you are talking about.</p> <p>7        Q. I was trying to interpret whether</p> <p>8        you didn't understand what a school girl</p> <p>9        outfit was or you are saying that didn't</p> <p>10       happen?</p> <p>11       A. I clearly know what a school girl</p> <p>12       outfit is. I have no recollection of</p> <p>13       providing anybody with a school girl outfit.</p> <p>14       Q. Did you have a set of outfits used</p> <p>15       by the massage therapists that would include</p> <p>16       things like a school girl outfit or a black</p> <p>17       patent leather outfit or anything of that</p> <p>18       nature?</p> <p>19       MR. PAGLIUCA: Object to the form</p> <p>20       and foundation.</p> <p>21       A. That would be just another one of</p> <p>22       Virginia's lies.</p> <p>23       Q. You didn't have anything like that?</p> <p>24       A. I did not.</p> <p>25       Q. Did you have a basket of sex toys</p>

Page 70

1 G Maxwell - Confidential  
 2 that you kept in the Palm Beach house?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. First of all what do you mean.  
 6 Q. A laundry basket that contained sex  
 7 toys in it?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. Can you ask the question again?  
 11 Q. Did you have a laundry basket that  
 12 contained sex toys in it, in the Palm Beach  
 13 House?  
 14 MR. PAGLIUCA: Objection to the  
 15 form and foundation.  
 16 Q. Did you have a laundry basket of  
 17 sex toys in the Palm Beach house?  
 18 MR. PAGLIUCA: Same objection.  
 19 Q. You can answer.  
 20 A. I don't recollect anything about a  
 21 laundry basket of sex toys.  
 22 Q. Do you recollect having sex toys at  
 23 the Palm Beach house?  
 24 A. You have to define what are you  
 25 talking about.

Page 72

1 G Maxwell - Confidential  
 2 [REDACTED]

Page 71

1 G Maxwell - Confidential  
 2 Q. A sex toy meaning a vibrator of  
 3 some kind, sometimes they are called dildos,  
 4 of that nature, anything like that?  
 5 A. I don't recollect anything that  
 6 would formally be a dildo, anything like  
 7 that.  
 8 Q. How would you describe sex toys?  
 9 A. I wouldn't describe sex toys.  
 10 Q. Did you have anything that was of  
 11 an electronic nature that would be used  
 12 during sex?  
 13 MR. PAGLIUCA: Objection to the  
 14 form and foundation.  
 15 A. I have no idea what you are  
 16 referring to.  
 17 (Maxwell Exhibit 3, transcript,  
 18 marked for identification.)  
 19 [REDACTED]

Page 73

1 G Maxwell - Confidential  
 2 [REDACTED]

1 G Maxwell - Confidential  
2 [REDACTED]

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

7 A. First I have to read this.

8 Q. Sure.

9 MS. McCAWLEY: I will stop the  
10 clock while the witness is reading.

11 MR. PAGLIUCA: No.

12 MS. McCAWLEY: Yes, if she is going  
13 to read the whole document, I will stop  
14 the clock.

15 MR. PAGLIUCA: If you give her  
16 documents to refresh her recollection,  
17 we are on the clock here.

18 MS. McCAWLEY: Then we will take it  
19 up with the judge.

20 MR. PAGLIUCA: Read whatever you  
21 need to answer the question.

22 MS. McCAWLEY: I'm going to set the  
23 document aside and I'm just go to ask  
24 you a question, independent of the  
25 document.

1 G Maxwell - Confidential

2 Q. Do you recall having a basket full  
3 of sex toys?

4 A. I already told you I did not.

5 Q. We were talking a moment ago about  
6 Ms. Roberts and her position as a masseuse,  
7 do you know what she was paid for working as  
8 a masseuse for Jeffrey Epstein?

9 A. I do not.

10 Q. Did you ever pay her?

11 A. I don't ever recall paying her.

12 Q. Do you know what happened during  
13 the massage appointments with Jeffrey Epstein  
14 and Virginia Roberts?

15 MR. PAGLIUCA: Objection to the  
16 form and foundation.

17 A. No.

18 Q. Were you ever present to view a  
19 massage between Jeffrey Epstein and Virginia  
20 Roberts?

21 A. I don't recollect ever seeing  
22 Virginia and Jeffrey in a massage situation.

23 Q. Do you ever recollect seeing them  
24 in a sexual situation?

25 A. I never saw them in a sexual

1 G Maxwell - Confidential  
2 situation.

3 Q. Did you ever participate in sex  
4 with Virginia Roberts and Jeffrey Epstein?

5 A. I never ever at any single time at  
6 any point ever at all participated in  
7 anything with Virginia and Jeffrey. And for  
8 the record, she is an absolute total liar and  
9 you all know she lied on multiple things and  
10 that is just one other disgusting thing she  
11 added.

12 Q. Did you help her obtain an  
13 apartment in Palm Beach to live in?

14 MR. PAGLIUCA: Objection to the  
15 form and foundation.

16 Q. Was that part of your  
17 responsibilities for Jeffrey?

18 A. First of all, I didn't know she had  
19 an apartment in Palm Beach. I only learned  
20 that from the many times you guys have gone  
21 to the press to sell stories, so no.

22 Q. Did you help her get a cell phone,  
23 was that one of your responsibilities for  
24 Jeffrey, to get her a cell phone as part  
25 of her masseuse obligations?

1 G Maxwell - Confidential

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

4 A. I don't know what that means,  
5 masseuse obligation, I don't know what you  
6 are referring to. Would you like to ask the  
7 question properly?

8 Q. I think it was proper. I will ask  
9 it again.

10 Did you ever assist in getting  
11 Virginia Roberts a cell phone to use during  
12 the time that she worked for Jeffrey Epstein?

13 A. I have no recollection of doing  
14 anything of that nature.

15 Q. Did you ever tell Virginia that you  
16 wanted her to have a cell phone so that she  
17 could be on call regularly?

18 A. I have no recollection of that  
19 conversation.

20 Q. How often would Virginia come over  
21 to the house in Palm Beach to give massages?

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

24 A. Ask the question again, please.

25 Q. How often did Virginia Roberts come

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

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

<p style="text-align: right;">Page 86</p> <p>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 down 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</p>	<p style="text-align: right;">Page 88</p> <p>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</p>
<p style="text-align: right;">Page 87</p> <p>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 [REDACTED] 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 --</p>	<p style="text-align: right;">Page 89</p> <p>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</p>

<p style="text-align: right;">Page 90</p> <p>1        G Maxwell - Confidential    2        assaulted by Jeffrey Epstein during the time    3        you were working there?    4        A. Based on the lies that I have    5        already been told, I cannot comment on any --    6        Q. Are you saying these 30 girls are    7        lying when they gave these reports to police    8        officers?    9        A. I'm not testifying to their lies.    10      I'm testifying to Virginia's lies.    11      Q. I am not asking about Virginia's    12      lies.    13      A. I can only testify to Virginia's    14      lies. I can testify to having read these    15      reports. I cannot testify to anything else    16      about them.    17      Q. So your testimony is that during    18      the time you were working there, you did not    19      know that these minor children were being    20      abused in the home while you were there?    21      A. What I have already told you and I    22      will repeat, I was in the house very limited    23      times, very few times. I do not know what    24      you are referring to. I've read these    25      reports but based on the lies that Virginia</p>	<p style="text-align: right;">Page 92</p> <p>1        G Maxwell - Confidential    2        Q. In your responsibilities in working    3        for Jeffrey, would you book massages for him    4        on any given day so that he would have a    5        massage scheduled? Would you take a call for    6        example and book a massage for him?    7        MR. PAGLIUCA: Objection to the    8        form and foundation.    9        Q. You can answer.    10      A. Typically, that was not my    11      responsibility. He would either book the    12      massage himself or one of his other    13      assistants would do that.    14      Q. From time to time you had to do    15      that?    16      MR. PAGLIUCA: Objection to the    17      form and foundation.    18      A. Like I said, typically it was    19      somebody else's responsibility.    20      Q. If you were unable to book a girl    21      for a massage on a given day, would that mean    22      that you were responsible for giving him a    23      sexual massage?    24      MR. PAGLIUCA: Objection to the    25      form and foundation and I instruct you</p>
<p style="text-align: right;">Page 91</p> <p>1        G Maxwell - Confidential    2        has perpetrated, cannot tell you what is true    3        or factual or not.    4        Q. You said you were in the home a    5        very limited time, so average in the year for    6        example, 2004, how many times would you have    7        been in his Palm Beach home?    8        A. Very hard for me to state but very    9        little.    10      Q. How about his New York home?    11      A. Same.    12      Q. Were you his girlfriend in that    13      year, in 2004?    14      A. Define what you mean by girlfriend.    15      Q. Were you in a relationship with him    16      where you would consider yourself his    17      girlfriend?    18      A. No.    19      Q. Did you ever consider yourself his    20      girlfriend?    21      A. That's a tricky question. There    22      were times when I would have liked to think    23      of myself as his girlfriend.    24      Q. When would that have been?    25      A. Probably in the early '90s.</p>	<p style="text-align: right;">Page 93</p> <p>1        G Maxwell - Confidential    2        not to answer any questions about any of    3        your consensual adult sexual activity.    4        Q. So you are not going to answer that    5        question?    6        A. You just heard my counsel.    7        Q. Have you ever said to anybody that    8        recruiting other girls to perform sexual    9        massages for Jeffrey Epstein takes the    10       pressure off you?    11       MR. PAGLIUCA: Object to the form    12       and foundation.    13       A. Repeat the question and break it    14       out.    15       Q. Have you ever said to anybody that    16        you recruit girls --    17       A. Stop right there. I never    18        recruited girls, let's stop there. Now    19        breakdown the question.    20       Q. Have you ever said to anybody --    21       A. By girls, we are talking about    22        underage people -- you said girls, are you    23        talking about underage -- we are not talking    24        about consensual acts -- this is a defamation    25        suit.</p>

<p style="text-align: right;">Page 94</p> <p>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</p>	<p style="text-align: right;">Page 96</p> <p>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.</p>
<p style="text-align: right;">Page 95</p> <p>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</p>	<p style="text-align: right;">Page 97</p> <p>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>

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

<p style="text-align: right;">Page 102</p> <p>1        G Maxwell - Confidential  2        A. I don't recall.  3        Q. Did it change over the years or did  4        the payment remain the same?  5        A. I believe over the course of time  6        it increased a little bit.  7        Q. Was that the -- was that payment  8        the payment that -- was the payment made with  9        respect to the jobs, the work you were  10      performing for Jeffrey, was that your sole  11      income at that time?  12      MR. PAGLIUCA: I object to the  13      form. I'm also going to instruct you  14      not to answer about sources of -- your  15      personal sources of income outside of  16      Mr. Epstein at all.  17      MS. McCAWLEY: What's the basis for  18      that?  19      MR. PAGLIUCA: It's confidential,  20      it's not part of this lawsuit.  21      MS. McCAWLEY: We have a protective  22      order and it is part of this lawsuit  23      with respect to our damage claims.  24      MR. PAGLIUCA: It's not and, in  25      fact, you are not entitled to ask</p>	<p style="text-align: right;">Page 104</p> <p>1        G Maxwell - Confidential  2        worked for it and I had a loan, we did loans.  3        Q. So a loan through Jeffrey?  4        A. I don't recall the exact  5        transaction.  6        Q. Did he purchase for you a  7        helicopter during the time you were working  8        for him?  9        A. It was his helicopter.  10      Q. When did you obtain your pilot  11      license?  12      A. I believe it was '98 or '99.  13      Q. Was that for both airplanes and  14      helicopters or just helicopters?  15      A. Just helicopters.  16      Q. Have you ever flown [REDACTED]  17      [REDACTED] on your helicopter?  18      A. That is another one of Virginia's  19      lies.  20      Q. The question is have you ever done  21      that?  22      A. I have never flown [REDACTED]  23      [REDACTED] at any time ever, in any helicopter,  24      in any place, any time, in any state, in any  25      country, at any time anywhere.</p>
<p style="text-align: right;">Page 103</p> <p>1        G Maxwell - Confidential  2        financial information of a defendant in  3        this kind of case, in a defamation case  4        unless and until there is a finding that  5        you are entitled to punitive damages.  6        That is clear in New York case law, both  7        state and Federal.  8        MS. McCAWLEY: We disagree on that  9        point and we will come back to that.  10      Q. From the source of payment from the  11      source of Jeffrey, from your work, can you  12      give me a range on that, do you know was it  13      over \$100,000?  14      A. I just testified I don't recall.  15      Q. You don't know if it was  16      \$500,000?  17      A. It was less than that.  18      Q. Somewhere between 100 and 500,  19      would that be fair to say?  20      A. I believe it was between 100 and  21      \$200,000.  22      Q. Did Jeffrey during the time that  23      you were working for him purchase a town home  24      for you?  25      A. The subject of the townhouse is, I</p>	<p style="text-align: right;">Page 105</p> <p>1        G Maxwell - Confidential  2        Q. Have you ever had dinner with  3        [REDACTED] at Jeffrey's home, at any  4        of Jeffrey's homes?  5        A. No, I don't believe so.  6        Q. Have you traveled on Jeffrey's  7        planes with [REDACTED]  8        A. Yes, I have.  9        Q. Would that have been in 2002?  10      A. It's very hard for me to recollect  11      exact dates but that sounds about right.  12      Q. Was that during the time that  13      Virginia was working for Jeffrey?  14      A. I don't know that Virginia ever did  15      work for Jeffrey. I don't exactly know if  16      she testified to her so-called duties, we  17      know she is a serial liar so I can't testify  18      to what she did or didn't do. So I object to  19      that characterization of her. So repeat the  20      question, please.  21      Q. Can you read the question back?  22      (Record read.)  23      Q. You can answer the question.  24      A. What was the question again?  25      Q. When you were traveling on the</p>

1 G Maxwell - Confidential  
 2 plane with [REDACTED], was that during  
 3 the time, it was 2002, that you were on a  
 4 flight with [REDACTED], was that during the time  
 5 Virginia was working for Jeffrey?

6 MR. PAGLIUCA: Object to the form.  
 7 Misstates the witness' answer and if you  
 8 can answer the question, you can answer  
 9 it.

10 A. Well, like I said, I don't recall  
 11 exactly when I flew with him. I don't recall  
 12 when Virginia, we know what Virginia claims  
 13 when she left, so I can't answer the  
 14 question. I have no idea.

15 Q. Do you know [REDACTED]

16 A. I do.

17 Q. How long have you known him?

18 A. A very long time.

19 Q. Since you were a child?

20 A. I really -- it's so long, it's  
 21 really a long time ago. I just don't recall.

22 Q. Do you remember how you first met  
 23 him?

24 A. No, I do not.

25 Q. Did you introduce him to Jeffrey?

1 G Maxwell - Confidential  
 2 that he may have met socially through me.  
 3 Q. Did you ever introduce [REDACTED]  
 4 [REDACTED] to Virginia in London?

5 A. I understand her story about [REDACTED]  
 6 but again, her tissue of lies is extremely  
 7 hard to pick apart what is true and what  
 8 isn't. Actually I wouldn't recollect her at  
 9 all but for her tissue stories about this  
 10 situation.

11 Q. So did you ever introduce [REDACTED]  
 12 [REDACTED] to Virginia in London?

13 A. I have no recollection.

14 Q. Did Virginia ever stay at your home  
 15 in London, your town home?

16 A. I know she claims she did but if  
 17 you are asking me here today to remember  
 18 specifically, I cannot.

19 Q. Do you remember taking a trip with  
 20 Virginia to travel over to Europe, including  
 21 London?

22 A. So I have seen her reports and I  
 23 have seen the plane reports. I see she says  
 24 she was on that but again, I really have no  
 25 recollection of her.

1 G Maxwell - Confidential  
 2 A. That would be another of Virginia's  
 3 lies and the lies you perpetrate. I never  
 4 introduced [REDACTED] to Jeffrey Epstein  
 5 at any time ever, so just add that to  
 6 long list of lies.

7 Q. Did Jeffrey know [REDACTED]  
 8 A. Clearly he knew him. I think we  
 9 have that answer but how -- yeah.

10 Q. Do you know how Jeffery met [REDACTED]

11 [REDACTED]  
 12 A. I do not know Jeffrey met [REDACTED]  
 13 [REDACTED]. What I do know is that I did not  
 14 introduce them. That is one of the many  
 15 lies. Are we tallying all the lies?

16 Q. Do you know when Jeffrey met [REDACTED]

17 [REDACTED]  
 18 A. I do not know when Jeffrey met  
 19 [REDACTED].

20 Q. Did you ever introduce [REDACTED]  
 21 [REDACTED] to any girls under the age of 18 who  
 22 were not friends of yours children?

23 A. I have not introduced [REDACTED]  
 24 to anyone that I am aware of other than  
 25 friends of mine who have kids under that age

1 G Maxwell - Confidential

2 Q. Did you know that she was 17 at the  
 3 time of that trip?

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

6 A. I have --

7 Q. Did you know she was 17 at the time  
 8 of that trip?

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

11 A. I didn't even know she was on the  
 12 trip.

13 Q. Did you hold her passport for her  
 14 when she was traveling?

15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.

17 A. I have no recollection whatsoever  
 18 of her even being on the trip nor holding her  
 19 passport.

20 (Maxwell Exhibit 4, picture, marked  
 21 for identification.)

22 Q. I'm showing you what we marked as  
 23 Maxwell Exhibit 4.

24 Can you take a look at that picture  
 25 for me?

1 G Maxwell - Confidential  
 2 A. I've looked at it.  
 3 Q. Are you in that picture?  
 4 A. I am.  
 5 Q. [REDACTED]  
 6 [REDACTED]  
 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

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 [REDACTED], 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 [REDACTED], Jeffrey  
 13 Epstein and yourself and Virginia Roberts?  
 14 A. I would just like to state for the  
 15 record [REDACTED]  
 [REDACTED]  
 [REDACTED]. 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 [REDACTED]

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 [REDACTED] 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 [REDACTED] being  
 25 present in New York for a party where [REDACTED]

1 G Maxwell - Confidential  
 2 [REDACTED] was also present?  
 3 A. I don't recollect.  
 4 Q. Do you recall ever giving [REDACTED]  
 5 [REDACTED] 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 [REDACTED] --  
 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

1 G Maxwell - Confidential  
 2 your London town home?  
 3 A. I have no idea what this picture  
 4 was taken. I know what she purports it to be  
 5 but I'm not going to say that I do.  
 6 Q. Do the surroundings look like your  
 7 London town home?  
 8 A. They are familiar.  
 9 Q. Do you know who took this picture?  
 10 A. I do not.  
 11 Q. Did Jeffrey Epstein take the  
 12 picture?  
 13 A. I just testified I don't know who  
 14 took the picture.  
 15 Q. So you don't know if Jeffery  
 16 Epstein took the picture?  
 17 A. When I tell you I don't know who  
 18 took the picture, it doesn't mean him -- I  
 19 don't know who took the picture. You can  
 20 come up with 50 names, I still do not know  
 21 who took the picture.  
 22 Q. Did you observe [REDACTED] go  
 23 into a room with Virginia alone in your town  
 24 home?  
 25 A. I cannot recall. As I have said,

1 G Maxwell - Confidential  
 2 no.  
 3 Q. Did [REDACTED] ever tell you  
 4 that he had sex with Virginia Roberts?  
 5 A. He did not.  
 6 Q. Did Jeffrey Epstein ever tell you  
 7 that [REDACTED] had sex with Virginia  
 8 Roberts?  
 9 A. He did not.  
 10 Q. Did [REDACTED] ever visit -- let  
 11 me back up for a moment. We talked about  
 12 Jeffrey's homes, did Jeffrey have a home in  
 13 the U.S. Virgin islands called Little St.  
 14 James?  
 15 A. Yes.  
 16 Q. Did [REDACTED] ever visit that  
 17 island -- are you aware of [REDACTED] ever  
 18 visiting Jeffrey's island?  
 19 A. I am aware of that, yes.  
 20 Q. Do you know how many times he  
 21 visited?  
 22 A. I do not.  
 23 Q. Do you know if he visited when  
 24 Virginia was on the island?  
 25 A. I do not.

1 G Maxwell - Confidential  
 2 Q. Were you present on the island when  
 3 [REDACTED] visited?  
 4 A. Yes.  
 5 Q. How many times?  
 6 A. I can only remember once.  
 7 Q. Were there any girls under the age  
 8 of 18 on the island during that one visit  
 9 that you remember that were not family or  
 10 friends of or daughters of your friends?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. There were no girls on the island  
 14 at all. No girls, no women, other than the  
 15 staff who work at the house. Girls meaning,  
 16 I assume you are asking underage, but there  
 17 was nobody female outside of the cooks and  
 18 the cleaners.  
 19 Q. Did you, as part of your duties in  
 20 working for Jeffrey, ever arrange for  
 21 Virginia to have sex with [REDACTED]  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. Just for the record, I have never  
 25 at any time, at anyplace, in any moment ever

1 G Maxwell - Confidential  
 2 asked Virginia Roberts or whatever she is  
 3 called now to have sex with anybody.  
 4 Q. Did you ever provide Virginia  
 5 Roberts with an outfit, an outfit of a sexual  
 6 nature to wear for [REDACTED]  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I think we addressed the outfit  
 10 issue.  
 11 Q. I am asking you if you ever  
 12 provided her with an outfit of a sexual  
 13 nature to wear for [REDACTED]  
 14 A. Categorically no. You did get  
 15 that, I said categorically no  
 16 Q. Don't worry I'm paying attention.  
 17 A. You seemed very distracted in that  
 18 moment.  
 19 (Maxwell Exhibit 6, flight logs,  
 20 marked for identification.)  
 21 A. Do you mind if I take a break for  
 22 the bathroom.  
 23 Q. It's 11:08 and we are going to go  
 24 off the record now.  
 25 THE VIDEOGRAPHER: It's now 11:09.

<p style="text-align: right;">Page 118</p> <p>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</p>	<p style="text-align: right;">Page 120</p> <p>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,    18 for [REDACTED] 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</p>
<p style="text-align: right;">Page 119</p> <p>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.</p>	<p style="text-align: right;">Page 121</p> <p>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 [REDACTED] 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>

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

<p>Page 126</p> <p>1 G Maxwell - Confidential  2 Jeffrey, yourself, [REDACTED] and Virginia  3 Roberts?</p> <p>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.</p> <p>11 MS. McCAWLEY: I understand.</p> <p>12 Q. Do you recall flying with those  13 individuals from Palm Beach to the U.S.  14 Virgin Islands?</p> <p>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?</p> <p>19 Q. I'm asking the questions.</p> <p>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.</p> <p>23 Q. So your testimony is you don't  24 recall flying on that flight with Virginia  25 Roberts?</p>	<p>Page 128</p> <p>1 G Maxwell - Confidential  2 your recollection.</p> <p>3 MR. PAGLIUCA: You are talking  4 about [REDACTED]</p> <p>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.</p> <p>9 MR. PAGLIUCA: So pick any pages  10 you want.</p> <p>11 Q. Does that refresh your recollection  12 at all as to whether GM represents you or  13 some other individual?</p> <p>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.</p> <p>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?</p> <p>25 MR. PAGLIUCA: Objection to the</p>
<p>Page 127</p> <p>1 G Maxwell - Confidential  2 A. I cannot testify to that flight.</p> <p>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, [REDACTED], Virginia Roberts, the  7 same individuals on the above flight.</p> <p>8 A. It doesn't say my name, it has some  9 initials.</p> <p>10 Q. I understand, the initials GM.</p> <p>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?</p> <p>14 A. I do not.</p> <p>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?</p> <p>19 MR. PAGLIUCA: Objection to the  20 form and foundation.</p> <p>21 A. I would have to look at all the  22 flight logs, I have no idea, I flew  23 frequently.</p> <p>24 Q. Why don't you take a look at the  25 next three pages and see if that refreshes</p>	<p>Page 129</p> <p>1 G Maxwell - Confidential  2 form and foundation.</p> <p>3 A. I can't testify to what -- these  4 are records that were produced by [REDACTED]  5 is on here, so these aren't federally  6 mandated records, so I can't testify to what  7 he produced.</p> <p>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].</p> <p>11 A. Okay.</p> <p>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, [REDACTED],  21 [REDACTED], it looks like --</p> <p>22 A. I believe it says male.</p> <p>23 Q. Yes. Then [REDACTED] I  24 believe. Is that GM on this page  25 representative of you?</p>

1 G Maxwell - Confidential  
 2 A. Well, this would be a flight that I  
 3 would potentially remember with [REDACTED]  
 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 [REDACTED], 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 [REDACTED] from [REDACTED] to  
 15 [REDACTED]  
 16 A. I don't recall the [REDACTED] to [REDACTED]  
 17 flight. I have definitely flown with  
 18 [REDACTED].  
 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.

1 G Maxwell - Confidential  
 2 A. Uh-huh.  
 3 Q. Do you recall flying with [REDACTED]  
 4 [REDACTED] from [REDACTED] to [REDACTED]  
 5  
 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 [REDACTED]  
 10 [REDACTED] 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]

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]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [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, [REDACTED],  
 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]  
 20 [REDACTED] Do you recall a trip that went from  
 21 the United States to [REDACTED] 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.

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

1 G Maxwell - Confidential  
 2 you said you visited Jeffrey's island, I  
 3 think they called it St. Jeffrey or St.  
 4 James, the U.S. Virgin Island home.  
 5 A. St. James.  
 6 Q. Do you recall whether [REDACTED]  
 7 [REDACTED] was ever on that island?  
 8 A. Categorically, definitively,  
 9 absolutely, without a shadow of a doubt, when  
 10 I was present or any other time that I am  
 11 aware of, was [REDACTED] ever on that  
 12 island, I do not believe he went to that  
 13 island ever ever, that is an absolute  
 14 fabrication and an absolute flat out lie.  
 15 Q. Was [REDACTED]  
 16 [REDACTED] ever at any of Jeffrey  
 17 Epstein's homes when you present, other than  
 18 the island I know you said that did not  
 19 happen, the home in either New York or Palm  
 20 Beach or New Mexico?  
 21 A. I do not believe at any time  
 22 [REDACTED] was at any of Jeffrey's  
 23 homes, I have absolutely no knowledge or  
 24 otherwise that he was ever there.  
 25 Q. You don't recall having dinner with

1 G Maxwell - Confidential  
 2 him at any of those homes?  
 3 A. Again, Virginia is absolutely  
 4 totally lying. This is a subject of  
 5 defamation about Virginia and the lies she  
 6 has told and one of lies she told was that  
 7 President Clinton was on the island where I  
 8 was present. Absolutely 1000 percent that is  
 9 a flat out total fabrication and lie.  
 10 Q. You did fly on planes, Jeffrey  
 11 Epstein's planes with President Clinton, is  
 12 that correct?  
 13 A. I have flown, yes.  
 14 Q. Would it be fair to say that  
 15 President Clinton and Jeffrey are friends?  
 16 A. I wouldn't be able to characterize  
 17 it like that, no.  
 18 Q. Are they acquaintances?  
 19 A. I wouldn't categorize it.  
 20 Q. He just allowed him to use his  
 21 plane?  
 22 A. I couldn't categorize Jeffrey's  
 23 relationship.  
 24 Q. When you were on the plane with  
 25 Jeffrey and President Clinton, did you

1 G Maxwell - Confidential  
 2 observe Jeffrey and [REDACTED]  
 3 talking?  
 4 A. I'm sure they did.  
 5 Q. Did they seem friendly?  
 6 A. I don't recollect.  
 7 Q. Was Epstein one of the original  
 8 people that conceived the [REDACTED]  
 9 [REDACTED]  
 10 MR. PAGLIUCA: Objection to the  
 11 form and foundation.  
 12 Q. Do you know?  
 13 A. I don't have -- I don't know what  
 14 you are talking about.  
 15 Q. You don't know what I'm talking  
 16 about.  
 17 Did you ever, not at one of houses,  
 18 but did you ever eat dinner with [REDACTED]  
 19 [REDACTED] and Jeffrey Epstein?  
 20 A. Are you just talking in general  
 21 anywhere.  
 22 Q. In general?  
 23 A. I believe on a plane of this nature  
 24 we would have had a meal.  
 25 Q. But not outside of the travel on

1 G Maxwell - Confidential  
 2 the flights?  
 3 A. I can't recollect having a meal  
 4 with them, but just so we are clear, the  
 5 allegations that [REDACTED] had a meal on  
 6 Jeffrey's island is 100 percent false.  
 7 Q. But he may have had a meal on  
 8 Jeffrey's plane?  
 9 A. I'm sure he had a meal on Jeffrey's  
 10 plane.  
 11 Q. You do know how many times he flew  
 12 on Jeffrey's plane?  
 13 A. I don't.  
 14 Q. Do you know who [REDACTED] is?  
 15 A. I do.  
 16 Q. How do you know him?  
 17 A. He used to work or still works for  
 18 [REDACTED].  
 19 Q. Did you ever have a relationship  
 20 with him?  
 21 A. We are talking about adult  
 22 consensual relationships, it's off the  
 23 record.  
 24 Q. I'm not asking what you did with  
 25 him, I'm asking if you ever had a

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 [REDACTED] 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 [REDACTED], 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

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 [REDACTED] 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 [REDACTED] 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

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 [REDACTED]  
9 [REDACTED].

10 Do you remember being in Thailand  
11 with [REDACTED]

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 [REDACTED]?

23 A. She I believe was a stewardess on  
24 this flight.

25 Q. Did she perform any massages on the

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]

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 [REDACTED]. 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 [REDACTED]  
 25 at all.

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

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 with [REDACTED]  
 [REDACTED]

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

<p style="text-align: right;">Page 150</p> <p>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 [REDACTED] and then I see under the  15      M line it looks like [REDACTED] 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 [REDACTED] taking down a message for you  21      from [REDACTED], 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.</p>	<p style="text-align: right;">Page 152</p> <p>1        G Maxwell - Confidential  2        for JE, date [REDACTED], message [REDACTED]  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?</p>
<p style="text-align: right;">Page 151</p> <p>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 [REDACTED] 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</p>	<p style="text-align: right;">Page 153</p> <p>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 [REDACTED] is?  13       A. No, I don't.  14       Q. Do you know whether [REDACTED]  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]</p>

<p style="text-align: right;">Page 154</p> <p>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</p>	<p style="text-align: right;">Page 156</p> <p>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.</p>
<p style="text-align: right;">Page 155</p> <p>1        G Maxwell - Confidential  2 messages, very, very, very, very  3 infrequently.  4        Q. Do you know if [REDACTED] 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 [REDACTED] 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.</p>	<p style="text-align: right;">Page 157</p> <p>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 [REDACTED]</p>

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 [REDACTED] 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 [REDACTED] 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 [REDACTED] is

1 G Maxwell - Confidential  
 2 referring to.  
 3 Q. Do you know if [REDACTED] 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 [REDACTED]  
 10 ever tell you that [REDACTED] 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

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.

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

<p style="text-align: right;">Page 162</p> <p>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.</p>	<p style="text-align: right;">Page 164</p> <p>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</p>
<p style="text-align: right;">Page 163</p> <p>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: Objection 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</p>	<p style="text-align: right;">Page 165</p> <p>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.</p>

<p style="text-align: right;">Page 166</p> <p>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 [REDACTED] with a phone</p>	<p style="text-align: right;">Page 168</p> <p>1        G Maxwell - Confidential  2        off the record.  3        (Recess.)  4        A F T E R N O O N   S E S S I O N  5        (Time noted: 1:21 p.m.)  6        G H I S L A I N E   M A X W E L L ,  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</p>
<p style="text-align: right;">Page 167</p> <p>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 [REDACTED]  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</p>	<p style="text-align: right;">Page 169</p> <p>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</p>

<p style="text-align: right;">Page 170</p> <p>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?</p> <p>7        MR. PAGLIUCA: Objection to the  8 form and foundation.</p> <p>9        A. What do you mean I talked to  10 Jeffrey, you need to break the question down  11 further.</p> <p>12       Q. So you have the police report.</p> <p>13       A. I do.</p> <p>14       Q. And you are aware of the criminal  15 investigation?</p> <p>16       A. I am.</p> <p>17       Q. Let's take those two things. After  18 knowing those two things, do you believe that  19 Jeffrey Epstein abused minor children?</p> <p>20       MR. PAGLIUCA: Objection to the  21 form and foundation.</p> <p>22       A. Can you explain what you mean by  23 the question actually.</p> <p>24       Q. I think the question speaks for  25 itself. I will try again. I will say it one</p>	<p style="text-align: right;">Page 172</p> <p>1        G Maxwell - Confidential  2 sentenced for sexual abuse, are you aware of  3 that?</p> <p>4        MR. PAGLIUCA: Objection to the  5 form and foundation.</p> <p>6        Q. Are you aware that Jeffrey Epstein  7 served time for sexual abuse of a minor?</p> <p>8        MR. PAGLIUCA: Objection to the  9 form and foundation.</p> <p>10       A. I don't believe that's what he was  11 sentenced for, actually.</p> <p>12       Q. So you don't know that Jeffrey  13 Epstein served time for sexually abusing a  14 minor?</p> <p>15       MR. PAGLIUCA: Objection to the  16 form and foundation.</p> <p>17       A. I don't believe that's what he was  18 sentenced for.</p> <p>19       Q. Do you know that Jeffrey Epstein  20 was convicted for procuring a minor for  21 prostitution?</p> <p>22       MR. PAGLIUCA: Objection to the  23 form and foundation.</p> <p>24       A. I don't know exactly what he was  25 convicted of. I don't know that he was</p>
<p style="text-align: right;">Page 171</p> <p>1        G Maxwell - Confidential  2 more time because I want you to be able to  3 understand it.</p> <p>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?</p> <p>8        MR. PAGLIUCA: Same objection.</p> <p>9        A. I know what you put in front of me  10 and I know what I read.</p> <p>11       Q. I'm asking what you believe, do you  12 believe Jeffrey Epstein sexually abused  13 minors?</p> <p>14       A. I can only tell you what I read and  15 what you showed me.</p> <p>16       Q. I'm asking what you believe, from  17 your own belief, do you believe that Jeffrey  18 Epstein abused minors?</p> <p>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.</p> <p>25       Q. You are aware Jeffrey Epstein was</p>	<p style="text-align: right;">Page 173</p> <p>1        G Maxwell - Confidential  2 convicted. I know he spent time in jail.</p> <p>3        Q. Do you know that he spent time in  4 jail related to an issue with a minor child?</p> <p>5        MR. PAGLIUCA: Objection to the  6 form and foundation.</p> <p>7        A. I did not know that.</p> <p>8        Q. What did you think he was spending  9 time in jail for?</p> <p>10       A. I only know he went to jail for --  11 it was alleged that he hired -- had an  12 underage prostitute.</p> <p>13       Q. So knowing that, do you believe  14 that Jeffrey Epstein sexually abused minors?</p> <p>15       MR. PAGLIUCA: Objection to the  16 form and foundation.</p> <p>17       A. I can only tell you what he went to  18 jail for.</p> <p>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.</p> <p>22       A. I cannot testify to what I believe.</p> <p>23       I can only say what I have seen in the  24 reports and I know he went to jail.</p> <p>25       Q. You can testify to what you</p>

<p style="text-align: right;">Page 174</p> <p>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.</p>	<p style="text-align: right;">Page 176</p> <p>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</p>
<p style="text-align: right;">Page 175</p> <p>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.</p>	<p style="text-align: right;">Page 177</p> <p>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.</p>

<p style="text-align: right;">Page 178</p> <p>1        G Maxwell - Confidential    2        What I'm asking you is whether you    3        believe Jeffrey Epstein abused minors?    4        MR. PAGLIUCA: I object to the form    5        and you made your record, she answered    6        the question. A fair reading of her    7        answer is she doesn't have a belief    8        because she doesn't have any personal    9        knowledge.    10        MS. McCAWLEY: Now you are    11        testifying for the witness. Let her    12        answer the question.    13        MR. PAGLIUCA: It's a fair answer    14        to the question.    15        A. Again, I testified my only personal    16        knowledge concerns Virginia and everything    17        Virginia has said is an absolute lie, which    18        is why we are here in this room. If you are    19        asking me to testify about things I have no    20        knowledge of other than the police report    21        that you showed me, I am not in a position to    22        make a statement based on that because you    23        are asking me to speculate and I cannot    24        speculate.    25        Q. I'm asking you about your belief.</p>	<p style="text-align: right;">Page 180</p> <p>1        G Maxwell - Confidential    2        said is a lie. Therefore, based on those    3        lies I cannot speculate on what anybody else    4        did or didn't do because if Virginia is the    5        example of what that story is and everything    6        she said is false, so everything that leads    7        from that is false.    8        Q. So the 30 other minor children in    9        the police report are also telling lies about    10        being sexually abused during massages with    11        Mr. Epstein?    12        MR. PAGLIUCA: Objection to the    13        form and foundation. Counsel, can you    14        show me in these police reports who the    15        30 minors are?    16        MS. McCAWLEY: I'm asking my    17        question.    18        MR. PAGLIUCA: You are making a    19        representation about numbers, you are    20        making a representation on the record    21        about what people said or didn't say.    22        We have no knowledge about that. These    23        are all redacted records so these are    24        bad questions. They don't lead to any    25        admissible evidence. It is only being</p>
<p style="text-align: right;">Page 179</p> <p>1        G Maxwell - Confidential    2        I'm not asking you to speculate at all. I'm    3        asking what you believe.    4        A. You are asking me to speculate and    5        I won't speculate.    6        Q. I'm not asking you to speculate.    7        I'm asking what you believe.    8        MR. PAGLIUCA: She answered the    9        question and we can move on.    10        MS. McCAWLEY: She hasn't answered    11        the question.    12        MR. PAGLIUCA: We are not going to    13        engage in this debate. She answered the    14        question. If you want to mark it and    15        move to compel an answer to the    16        question, have at it. Okay.    17        Q. Ms. Maxwell, is it your belief that    18        Jeffrey Epstein interacted sexually with    19        minors?    20        A. Again, you are asking me the same    21        type of question exactly but with different    22        language. Again, my only knowledge of    23        somebody who claims these things that I have    24        personal knowledge of is Virginia. Virginia    25        is an absolute liar and everything she has</p>	<p style="text-align: right;">Page 181</p> <p>1        G Maxwell - Confidential    2        propounded to the witness to harass her.    3        So we are done with these questions.    4        MS. McCAWLEY: Are you done?    5        MR. PAGLIUCA: Yes.    6        Q. My question is, are you aware that    7        Jeffrey Epstein was convicted of having    8        relations with a minor child?    9        MR. PAGLIUCA: She answered that    10        question already.    11        MS. McCAWLEY: I'm getting to my    12        next question.    13        MR. PAGLIUCA: Ask your next    14        question. Don't keep asking the same    15        question.    16        MS. McCAWLEY: You are now    17        shouting, I want the record to reflect    18        that you are interrupting the    19        deposition. I ask you to calm down,    20        take a deep breath and please let me ask    21        my questions.    22        MR. PAGLIUCA: Your behavior is    23        inappropriate.    24        Q. I will ask you again.    25        Do you believe that Jeffrey Epstein</p>

<p style="text-align: right;">Page 182</p> <p>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</p>	<p style="text-align: right;">Page 184</p> <p>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</p>
<p style="text-align: right;">Page 183</p> <p>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</p>	<p style="text-align: right;">Page 185</p> <p>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>

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

<p style="text-align: right;">Page 190</p> <p>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</p>	<p style="text-align: right;">Page 192</p> <p>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</p>
<p style="text-align: right;">Page 191</p> <p>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.</p>	<p style="text-align: right;">Page 193</p> <p>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</p>

<p style="text-align: right;">Page 194</p> <p>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</p>	<p style="text-align: right;">Page 196</p> <p>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</p>
<p style="text-align: right;">Page 195</p> <p>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</p>	<p style="text-align: right;">Page 197</p> <p>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</p>

<p style="text-align: right;">Page 198</p> <p>1        G Maxwell - Confidential    2 that was true.    3        Q. Nothing she said that you are aware    4 of is true?    5        A. I think she is correct when she    6 talks about what her name is.    7        Q. Anything else?    8        A. I'm sure there must be one or two    9 other details but they are so far and few    10 between, I would have to look in detail at    11 all of her allegations to pinpoint what    12 possibly could be true.    13        Q. Did you ever ask Jeffrey if he had    14 sex with minors?    15        A. I have never been asked that    16 question.    17        Q. You never asked him that question.    18        What analysis did Jeffrey do to    19 determine that the statements Virginia    20 Roberts were making were lies?    21        MR. PAGLIUCA: Objection to the    22 form and foundation.    23        A. Ask me again, please.    24        Q. What analysis did Jeffrey do to    25 determine that the statements that Virginia</p>	<p style="text-align: right;">Page 200</p> <p>1        G Maxwell - Confidential    2 communications subject to a joint    3 defense agreement or common interest    4 agreement, I'm telling her not to    5 answer. To the extent she has    6 information outside of those things, she    7 is permitted to answer.    8        Q. Do you understand?    9        So if it was a conversation with a    10 lawyer which I'm not asking about, I don't    11 want you to tell me about your conversations    12 with lawyers.    13        I want you to tell me whether    14 Jeffrey Epstein ever told you what he    15 analyzed in order to determine which of -- of    16 what Virginia were saying were lies?    17        A. I do not know what he did, no.    18        So you agree she is lying, Singrid.    19        Q. I do not agree with that and I'm    20 asking the questions.    21        A. You just said her lies.    22        Q. I'm repeating a statement you made.    23        Q. Are you saying it's an obvious lie    24 that Jeffrey Epstein engaged in sexual    25 conduct with Virginia while Virginia was</p>
<p style="text-align: right;">Page 199</p> <p>1        G Maxwell - Confidential    2 Roberts were making were lies?    3        MR. PAGLIUCA: Objection to the    4 form and foundation. And to the extent    5 that any of this answer calls for any    6 privileged communication, I'm    7 instructing, with myself or another    8 lawyer representing you or in any common    9 interest agreement, I'm instructing you    10 not to answer.    11        MS. McCAWLEY: The court ruled she    12 is entitled and you had to produce    13 documents about communications with    14 Jeffrey, that's what I'm asking about.    15 I'm not asking about communications with    16 lawyers.    17        Q. I'm asking what analysis did    18 Jeffrey do to determine that the statements    19 that Virginia Roberts was making were lies,    20 if you know?    21        MR. PAGLIUCA: My objection is to    22 the extent she learned any of that    23 information as a result of either a    24 privileged communication from a lawyer,    25 one of her lawyers or a privileged</p>	<p style="text-align: right;">Page 201</p> <p>1        G Maxwell - Confidential    2 underage?    3        A. I can only testify to what I saw    4 and what I was present for, so if you are    5 asking me what I saw then I am happy to    6 testify. I cannot testify to what somebody    7 else did or didn't do.    8        Q. Did you issue a statement [REDACTED]    9 [REDACTED] in 2015, stating that    10 Virginia Roberts' claims were, quote, obvious    11 lies?    12        MR. PAGLIUCA: Objection to the    13 form and foundation.    14        Q. You can answer.    15        A. You need to reask me the question.    16        Q. Sure.    17        Did you issue a press statement    18 [REDACTED], in    19 January of 2015, stating that Virginia    20 Roberts' claims were, quote, obvious lies?    21        MR. PAGLIUCA: Objection to the    22 form and foundation.    23        A. Can you ask it a different way,    24 please?    25        Q. I will ask it again and you can</p>

1 G Maxwell - Confidential  
 2 listen carefully.  
 3 Did you issue a press statement  
 4 [REDACTED], in  
 5 January of 2015, where you stated that  
 6 Virginia Roberts' claims were, quote, obvious  
 7 lies?

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

10 A. So my lawyer, [REDACTED]  
 11 instructed [REDACTED] to issue a statement.

12 Q. Today, did you say that Virginia  
 13 lied about, quote, absolutely everything?

14 A. I said that there are some things  
 15 she may not have lied about.

16 Q. So are you saying it's an obvious  
 17 lie that Jeffrey Epstein engaged in sexual  
 18 contact with Virginia while Virginia was  
 19 underage?

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

22 A. Can you ask the question again,  
 23 please?

24 Q. Are you saying it's an obvious lie  
 25 that Jeffrey Epstein engaged in sexual

1 G Maxwell - Confidential  
 2 conduct with Virginia while Virginia was  
 3 underage?

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

6 Q. You can answer.

7 A. Try again, please.

8 Q. Are you saying that it's an obvious  
 9 lie that Jeffrey Epstein engaged in sexual  
 10 conduct with Virginia while Virginia was  
 11 underage?

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

14 A. Again, I'm telling you, first of  
 15 all, it was a statement that was issued by my  
 16 lawyer and -- through my lawyer [REDACTED].

17 Q. I understand that. I'm asking you,  
 18 are you saying that it's an obvious lie that  
 19 Jeffrey Epstein engaged in sexual conduct  
 20 with Virginia while Virginia was underage.

21 Is that a lie?

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

24 Q. You can answer.

25 A. So I cannot testify to what [REDACTED]

1 G Maxwell - Confidential  
 2 [REDACTED] and [REDACTED] decided to put -- I can  
 3 testify to what Virginia's obvious lies are  
 4 as regards to me. I cannot make  
 5 representations about all the many lies she  
 6 may or may not have told about Jeffrey.

7 Q. So is Virginia lying when she says,  
 8 is it an obvious lie when she says that she  
 9 had sex with Jeffrey Epstein while she was  
 10 underage?

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

13 A. Again, I'm testifying to what I  
 14 know to be true. I can only testify to all  
 15 the many lies she told about me. I cannot  
 16 testify to what lies she told about somebody  
 17 else. Given she told so many about me, one  
 18 can probably infer she is lying about  
 19 everything.

20 Q. So you think she is lying when she  
 21 said she had sex with Jeffrey Epstein when  
 22 she was underage?

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

25 A. Again, I can only talk about what I

1 G Maxwell - Confidential  
 2 can positively say myself, not what somebody  
 3 else is going to represent.

4 Q. When you were saying that she was,  
 5 her claims of having sex with Jeffrey Epstein  
 6 were obvious lies, are you saying she is  
 7 lying about engaging in sexual conduct with  
 8 Jeffrey Epstein when she was underage?

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

11 Q. You can answer.

12 A. Again, this was a statement that  
 13 was put out from my lawyer [REDACTED]  
 14 [REDACTED]. And I can only testify to  
 15 the obvious lies that she says about me. I  
 16 cannot make representations about lies she  
 17 says about someone else, but she lies so many  
 18 times about me, one can probably infer she is  
 19 lying about everything.

20 Q. So is she not lying when -- is she  
 21 telling the truth when she says she had sex  
 22 with Jeffrey Epstein when she was underage?

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

25 A. Again, I don't know how else to

<p style="text-align: right;">Page 206</p> <p>1        G Maxwell - Confidential  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</p>	<p style="text-align: right;">Page 208</p> <p>1        G Maxwell - Confidential  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</p>
<p style="text-align: right;">Page 207</p> <p>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</p>	<p style="text-align: right;">Page 209</p> <p>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 [REDACTED]  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>

Page 210

1 G Maxwell - Confidential  
 2 of it. There is an opening email that says,  
 3 please find an attached quotable statement on  
 4 behalf of Ms. Maxwell and there is more  
 5 language there and it's from [REDACTED] and  
 6 then it says in the body of it, Jane Doe No.  
 7 3 or Jane Doe 3 is Virginia Roberts so not a  
 8 new individual. The allegations made by, and  
 9 it says Victoria but I believe that means  
 10 Virginia Roberts, against Ghislaine Maxwell  
 11 are not true. The original allegations are  
 12 not new and have been fully responded to and  
 13 shown to be untrue. And the next paragraph  
 14 says, Each time the story is retold, it  
 15 changes with new salacious details about  
 16 public figures and world leaders and now it  
 17 is alleged by Ms. Roberts that [REDACTED]  
 18 is involved in having sexual relations with  
 19 her which he denies. Ms. Roberts claims are  
 20 obvious lies and should be treated as such  
 21 and not publicized as news as they are  
 22 defamatory.  
 23 The last paragraph states,  
 24 Ghislaine Maxwell's original response to the  
 25 lies and defamatory claims remains the same.

Page 211

1 G Maxwell - Confidential  
 2 Maxwell strongly denies allegations of the --  
 3 strongly denies allegations of an unsavory  
 4 nature which have appeared in the British  
 5 press and elsewhere and reserves her right to  
 6 seek redress at the repetition of such old  
 7 defamatory claims.  
 8 Are you saying that it's an obvious  
 9 lie that Virginia Roberts traveled on Jeffrey  
 10 Epstein's planes?

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

13 A. I'm saying what's an obvious lie  
 14 and I think we can all agree, you just had  
 15 the case tossed out by [REDACTED]. He  
 16 just got removed from the case because you  
 17 put him in a case that he wasn't supposed to  
 18 be in so what was said about him is not true.

19 Q. Are you saying that it's an obvious  
 20 lie that Virginia Roberts traveled on Jeffrey  
 21 Epstein's plane?

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

24 A. You have given me plane records  
 25 that has her name on it but as I already

Page 212

1 G Maxwell - Confidential  
 2 testified those aren't federally mandated  
 3 things and I can see her name on it but  
 4 that's what I -- I told you I don't recall  
 5 her on any planes.  
 6 Q. Is is that one of Virginia's  
 7 obvious lies?  
 8 A. There are more obvious ones.  
 9 Q. Is that one of them?  
 10 A. I can't testify to her being on a  
 11 plane or not.  
 12 Q. So is that an obvious lie?  
 13 A. There are more obvious lies, like  
 14 [REDACTED].  
 15 Q. I understand there are more obvious  
 16 ones. I'm asking you, is the fact that she  
 17 said she traveled on Epstein's planes an  
 18 obvious lie?  
 19 A. I think we can probably say because  
 20 you see her name on a plane record and she  
 21 went from A to B, that would not be the  
 22 obvious lie that I would pick.  
 23 Q. What obvious lie were you picking  
 24 when you made this statement?  
 25 A. There are so many that I would be

Page 213

1 G Maxwell - Confidential  
 2 thrilled to go through all of them.  
 3 Q. Let's go through them.  
 4 What's the first one?  
 5 A. Her characterization of the first  
 6 meeting at Mar-a-Lago.  
 7 Q. What part of that was an obvious  
 8 lie?  
 9 A. The characterization that she said  
 10 that she said she was accosted. She looked  
 11 like, as best as I can recall, if I met her  
 12 in Mar-a-Lago as she claims, she worked at  
 13 Mar-a-Lago, she claims, and her statement she  
 14 worked at Mar-a-Lago, she would have been  
 15 dressed as all the spa people in Mar-a-Lago  
 16 would have been. It would have been  
 17 impossible to identify her as someone other  
 18 than someone who worked at a spa. She made  
 19 many claims, she has been a bathroom  
 20 attendant, front of house attendant, we don't  
 21 know what she was, so her obvious lies are  
 22 her contradictory of her own personal  
 23 statements within that.  
 24 Q. So what part of her statement  
 25 relating to Mar-a-Lago --

<p style="text-align: right;">Page 214</p> <p>1        G Maxwell - Confidential  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</p>	<p style="text-align: right;">Page 216</p> <p>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.</p>
<p style="text-align: right;">Page 215</p> <p>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?</p>	<p style="text-align: right;">Page 217</p> <p>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?</p>

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. [REDACTED].  
 10 A. Would [REDACTED] 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, [REDACTED] probably took her to meet  
 25 Jeffrey Epstein [REDACTED]

1 G Maxwell - Confidential  
 2 [REDACTED].  
 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

1 G Maxwell - Confidential  
 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

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

<p style="text-align: right;">Page 226</p> <p>1        G Maxwell - Confidential    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?</p>	<p style="text-align: right;">Page 228</p> <p>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</p>
<p style="text-align: right;">Page 227</p> <p>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,</p>	<p style="text-align: right;">Page 229</p> <p>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</p>

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 [REDACTED] story, the  
 9 story that I flew him with [REDACTED] 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 [REDACTED]  
 14 [REDACTED], 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 [REDACTED], she  
 20 is referring to a bunch of people. I don't  
 21 believe [REDACTED] ever came to the island at  
 22 any time ever. I don't even know [REDACTED]  
 23 actually.

24 Q. Just one moment, I want to hear all  
 25 of them, but when you say you don't believe

1 G Maxwell - Confidential  
 2 [REDACTED] ever came to the island, do you know  
 3 whether [REDACTED] ever came to the island?

4 A. [REDACTED] 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 [REDACTED] -- I don't  
 8 think -- had [REDACTED] 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 [REDACTED]  
 19 [REDACTED]

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

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 [REDACTED]  
 7 [REDACTED] 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 [REDACTED] 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 [REDACTED] ever come to your  
 23 London town home?

24 A. Yes. Ever being the entire time I  
 25 owned my house, yes.

1 G Maxwell - Confidential  
 2 [REDACTED] 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 by her a \$5,000 handbag.

15 Q. Did Jeffrey by 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?

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.

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 [REDACTED] 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 [REDACTED]  
 10 [REDACTED]  
 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 [REDACTED]?  
 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. [REDACTED]

1 G Maxwell - Confidential  
 2 [REDACTED]. She characterized  
 3 that [REDACTED].  
 4 [REDACTED].  
 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. [REDACTED]  
 10 [REDACTED].  
 11 Q. That would be [REDACTED]  
 12 [REDACTED].  
 13 A. Yes.  
 14 Q. Are you saying that it was an  
 15 obvious lie when Virginia said that you made  
 16 her dress up in a school girl outfit?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I already testified that, first of  
 20 all, I don't know what you are taking about,  
 21 I already testified I didn't get her outfits  
 22 and all of that.  
 23 Q. Is it an obvious lie that Virginia  
 24

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

<p style="text-align: right;">Page 242</p> <p>1        G Maxwell - Confidential    2        please?    3        Q. Is it an obvious lie that you had    4        sex toys in Jeffrey Epstein's Palm Beach    5        house?    6        MR. PAGLIUCA: Objection to the    7        form and foundation.    8        A. Did Virginia say that?    9        Q. I'm asking you a question.    10       Is it an obvious lie that you had    11       sex toys in Jeffrey Epstein's house?    12       A. I don't recall any sex toys.    13       Q. If someone said had you sex toys,    14       would that be an obvious lie?    15       MR. PAGLIUCA: Objection to the    16       form and foundation.    17       A. Like I said -- can you be more    18       specific about the house or whatever, what    19       exactly you are referring to, what's a sex    20       toy?    21       Q. Yes. How would you define a sex    22       toy?    23       A. No. I need you to define a sex    24       toy, I don't have enough knowledge of sex    25       toys.</p>	<p style="text-align: right;">Page 244</p> <p>1        G Maxwell - Confidential    2        I took of people would only have been    3        mainstream type magazine type photos and any    4        photos I took could have been very happily    5        and expected to be displayed on your parents'    6        mantel piece or grandparents' mantel piece.    7        Q. Is it a lie that you approached    8        females to bring them to Jeffrey Epstein?    9        MR. PAGLIUCA: Objection to the    10       form and foundation.    11       A. Please ask the question, again.    12       Q. Sure. Is it a lie that you    13       approached females to bring them to Jeffrey    14       Epstein?    15       A. I don't know what you are asking    16       me.    17       Q. I'm asking you, if it's a lie that    18       you approached females to bring them to    19       Jeffrey Epstein?    20       MR. PAGLIUCA: Objection to the    21       form and foundation.    22       A. You are not asking me a good    23       question, sorry.    24       Q. You don't get to choose the    25       questions.</p>
<p style="text-align: right;">Page 243</p> <p>1        G Maxwell - Confidential    2        Q. I will define it based on the    3        dictionary's definition, which is an object    4        or device used to sexually stimulate or    5        enhance sexual pleasure.    6        A. What's your question, please?    7        Q. The question is, is it an obvious    8        lie that you had sex toys in Jeffrey    9        Epstein's Palm Beach house?    10       MR. PAGLIUCA: Same objection.    11       Q. You can answer.    12       A. Like I said, I do not have any    13       recollection of sex toys in Jeffrey's house.    14       Q. Is it a lie, is it an obvious lie    15       that you took pictures of nude girls?    16       MR. PAGLIUCA: Object to the form    17       and foundation.    18       A. We already covered this. Girls we    19       are not referring to -- I can only testify to    20       taking pictures of adult people and I already    21       testified they are not nude, per se. That    22       every picture that I ever took and which they    23       were very limited, always by request, the    24       people would be covered or it would be a hand    25       or a foot. There was never any pictures that</p>	<p style="text-align: right;">Page 245</p> <p>1        G Maxwell - Confidential    2        A. I would like to answer your    3        questions but you are not asking me a    4        question that I can answer.    5        Q. What about that is causing you    6        pause where you can't answer the question?    7        A. You are trying to trap me and    8        that's not fair, so I already testified that    9        I hire people across the board, so I would    10       hire architects, decorators, pool people,    11       exercise instructors, gardeners, cooks,    12       chefs, cleaning people. So I, in the course    13       of a very long time when I would hire people    14       I hired people to work for Jeffrey. So I'm    15       happy to testify to hiring people for every    16       possible conceivable proper job that you    17       could conceive of within the context of    18       Jeffrey's life and homes.    19       Q. Is it a lie that you approached    20       females to bring them to Jeffrey Epstein for    21       the purpose of performing massages?    22       MR. PAGLIUCA: Objection to the    23       form and foundation.    24       A. Again, I have already testified    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  2        lots of different types of people. In terms  3        of whatever -- very small part of my job,  4        Jeffrey enjoyed getting massages. I think  5        that is something we can all agree in this  6        room and within the context of that, very  7        infrequently I would go to spas and myself  8        happily receive a professional nonsexual  9        massage from a man and/or from a woman and if  10       that massage was something that I thought was  11       something that was good, I would ask if that  12       man or woman would come back and does home  13       visits. If that person said that they did,  14       they would sometimes come, from time to time,  15       not always, come back to the house to perform  16       a nonsexual professional male or female  17       massage.</p> <p>18       Q. Were any of the exercise  19       instructors you hired under the age of 18?</p> <p>20       A. Again, I don't hire, we've already  21       established that I don't hire people. I  22       interview people to see if they are competent  23       in the job that they do and/or whether they  24       are someone who seemed that they can do home  25       visits.</p>	<p style="text-align: right;">Page 248</p> <p>1        G Maxwell - Confidential  2        of 18?</p> <p>3        A. I think we can establish what adult  4        would be.</p> <p>5        Q. You never interviewed or I know you  6        don't want to use the word hired, whatever  7        your role was, you brought in an exercise  8        instructor that was under the age of 18 to  9        work at the house?</p> <p>10       MR. PAGLIUCA: Object to the form  11       and foundation.</p> <p>12       A. I have already testified that what  13       I was responsible for was to find people who  14       had competencies in whatever area I was  15       looking for. The competencies I was looking  16       for were professional and adult.</p> <p>17       Q. So there was no exercise instructor  18       that worked at the Palm Beach house or the  19       New York house or the New Mexico house or the  20       USVI under the age of 18?</p> <p>21       MR. PAGLIUCA: Objection to the  22       form and foundation.</p> <p>23       A. I can only testify to when I was at  24       the house.</p> <p>25       Q. Yes.</p>
<p style="text-align: right;">Page 247</p> <p>1        G Maxwell - Confidential  2        At the point where I think that  3        there is somebody that has, can be either  4        whatever the job may be, pool, gardener, chef  5        and/or exercise instructor and I think they  6        could be good at whatever it is at whatever  7        skill that they had and they did a home visit  8        which would obviously be mandatory and Mr.  9        Epstein would meet with them and decide if he  10       wanted to have whatever skill it was that he  11       wanted to have and then he would then either  12       have them come back or hire them.</p> <p>13       Q. Were there any exercise instructors  14       that worked at the home that were under the  15       age of 18?</p> <p>16       MR. PAGLIUCA: Objection to the  17       form and foundation.</p> <p>18       A. Again, I keep coming back to this,  19       that the people that I employed or -- not the  20       right word, the people I would meet to come  21       and work at the house, under any guise  22       whatsoever, again, from any of the many  23       positions that I filled, were all over --  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  2        A. I can only testify to the years  3        when I was present.</p> <p>4        Q. Right.</p> <p>5        A. And I can also only testify to  6        people I personally either met and/or worked  7        with and/or invited, to find the correct  8        word, I don't know what the correct word is,  9        to come to do exercise or whatever it was at  10       the house.</p> <p>11       Of the people that I, male and/or  12       female that I brought were all appropriate  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,  17       so we are clear, you didn't hire or bring in  18       or know of any exercise instructors that were  19       under the age of 18 at any of those homes?</p> <p>20       A. I am also testifying that when I  21       was present at the house and with the people  22       that I brought in, were all age appropriate  23       adults.</p> <p>24       Q. How do you define age appropriate  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    2 agree to that?    3        MR. PAGLIUCA: Objection to the    4 form and foundation.    5        Q. Are they under the age of 18?    6        A. We already established that you can    7 be a masseuse in Florida at age 17. That    8 does not make it inappropriate.    9        A. I'm not saying appropriate or    10 inappropriate. I'm just asking if there were    11 any exercise instructors that were under the    12 age of 18.    13       A. I am not aware if anybody was but I    14 don't want to full out and say you oh she    15 said, we already established you can be a 17    16 year old masseuse and have it not be    17 something that is not appropriate. So when    18 you say that and then you go, well, you come    19 back and say something, now we can establish    20 that Virginia was 17 but you can be a 17 year    21 old legal masseuse, but I am not aware to    22 your point.    23       Q. Who were the other 17 year old    24 masseuses that you were aware of?    25       A. I am not aware of any.</p>	<p style="text-align: right;">Page 252</p> <p>1        G Maxwell - Confidential    2 Epstein had a sexual preference for underage    3 minors?    4        MR. PAGLIUCA: Object to the form    5 and foundation.    6        A. I cannot testify to what    7 Jeffrey's --    8        Q. You don't know his preference?    9        A. You handed me a stack of papers    10 from the police reports and that's what I've    11 read but I have no knowledge, direct    12 knowledge, of what you are referencing.    13       Q. So you don't know, you don't know    14 in your own mind that Jeffrey Epstein had a    15 sexual preference for underage minors, is    16 that correct?    17       MR. PAGLIUCA: Objection to the    18 form and foundation.    19       Q. Is that correct?    20       A. Please ask the question again.    21       Q. You don't know in your own mind    22 that Jeffrey Epstein had a sexual preference    23 for underage minors?    24       MR. PAGLIUCA: Objection to the    25 form and foundation. You have to pause,</p>
<p style="text-align: right;">Page 251</p> <p>1        G Maxwell - Confidential    2        Q. Were there any 16 year year old    3 masseuse that you are aware of?    4        A. I am not aware.    5        Q. Any 15?    6        A. I just want to be clear. The only    7 person that I am aware of who claims to have    8 been a -- we have to -- we established    9 Virginia now is 17, given she has changed her    10 age so many times. The only person that I am    11 aware of that was a masseuse at the time when    12 I was present in the house was Virginia.    13       Q. Is it an obvious lie that Jeffrey    14 Epstein had a sexual preference for underage    15 minors?    16       MR. PAGLIUCA: Objection to the    17 form and foundation.    18       A. Can you ask the question again?    19       Q. It is it an obvious lie that    20 Jeffrey Epstein had a sexual preference for    21 underage minors?    22       MR. PAGLIUCA: Objection to the    23 form and foundation.    24       A. Can you ask the question again?    25       Q. Is it an obvious lie that Jeffrey</p>	<p style="text-align: right;">Page 253</p> <p>1        G Maxwell - Confidential    2 let me object, answer the question.    3 Listen to her question, pause, I object,    4 you answer.    5       Q. So you don't know in your own mind    6 that Jeffrey Epstein had a sexual preference    7 for underage minors?    8       MR. PAGLIUCA: Objection to the    9 form and foundation.    10       Q. You can answer.    11       A. I cannot tell you what Jeffrey's    12 story is. I'm not able to.    13       Q. Did Jeffrey Epstein have a scheme    14 to recruit underage girls to use them for    15 purposes of sexual massages?    16       MR. PAGLIUCA: Objection to the    17 form and foundation.    18       A. Can you ask me again, please?    19       Q. Did Jeffrey Epstein have a scheme    20 to recruit underage girls to recruit them for    21 sexual massages?    22       MR. PAGLIUCA: Objection to the    23 form and foundation.    24       A. Can you ask it a different way?    25       Q. Did Jeffrey Epstein have a scheme</p>

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

<p style="text-align: right;">Page 258</p> <p>1        G Maxwell - Confidential    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</p>	<p style="text-align: right;">Page 260</p> <p>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 [REDACTED]    9        A. I don't know who [REDACTED] 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 [REDACTED]    14      A. I do know someone by the name of    15 [REDACTED].    16      Q. Would he know your phone number?    17      MR. PAGLIUCA: Objection 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</p>
<p style="text-align: right;">Page 259</p> <p>1        G Maxwell - Confidential    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</p>	<p style="text-align: right;">Page 261</p> <p>1        G Maxwell - Confidential    2 my name and my number on it.    3        Q. So [REDACTED] -- you said [REDACTED] -- is he    4 employed by Mr. Epstein?    5        A. Again, it is not the only one [REDACTED]    6 on the planet.    7        Q. I understand.    8        Do you know a [REDACTED] 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 [REDACTED] 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 [REDACTED]    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 [REDACTED] 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>

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

<p style="text-align: right;">Page 266</p> <p>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 [REDACTED], 23 [REDACTED], Jeffrey Epstein and the 24 initials GM. 25 Do you remember taking a trip with</p>	<p style="text-align: right;">Page 268</p> <p>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 [REDACTED] 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.</p>
<p style="text-align: right;">Page 267</p> <p>1 G Maxwell - Confidential 2 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED]</p>	<p style="text-align: right;">Page 269</p> <p>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?</p>

<p>Page 270</p> <p>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?</p>	<p>Page 272</p> <p>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</p>
<p>Page 271</p> <p>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.</p>	<p>Page 273</p> <p>1 G Maxwell - Confidential  2 statement that was issued by [REDACTED] 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 [REDACTED] 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 [REDACTED] 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</p>

<p style="text-align: right;">Page 274</p> <p>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 [REDACTED] 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,</p>	<p style="text-align: right;">Page 276</p> <p>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 overseas 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</p>
<p style="text-align: right;">Page 275</p> <p>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 [REDACTED].  18       Q. Did you pay that lawyer [REDACTED]  19       [REDACTED]  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.</p>	<p style="text-align: right;">Page 277</p> <p>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>

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

<p style="text-align: right;">Page 282</p> <p>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</p>	<p style="text-align: right;">Page 284</p> <p>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</p>
<p style="text-align: right;">Page 283</p> <p>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</p>	<p style="text-align: right;">Page 285</p> <p>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</p>

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 [REDACTED], I asked you whether you had  
 25 ever given him a gift of a puppet.

1 G Maxwell - Confidential  
 2 Did you ever, not as a gift, did  
 3 you ever see in the presence of [REDACTED]  
 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 [REDACTED] 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 [REDACTED]  
 17 [REDACTED] 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

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 [REDACTED]  
 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 [REDACTED]  
 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

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 [REDACTED]  
 13 [REDACTED] 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 [REDACTED] that was  
 23 in Jeffrey's home.  
 24 Q. Did you use that caricature to put  
 25 the hand of the caricature on [REDACTED]

1 G Maxwell - Confidential  
 2 [REDACTED] breast?  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. I don't recollect. I recollect the  
 6 puppet but I don't recollect anything around  
 7 the puppet. You characterized puppet, I  
 8 characterize it as, I don't know, as a  
 9 characterization of [REDACTED].  
 10 Q. Do you recollect asking Virginia  
 11 Roberts to sit on [REDACTED] lap with  
 12 the caricature of [REDACTED].  
 13 A. I do not recollect that.  
 14 Q. What do you remember about the  
 15 caricature of the [REDACTED] caricature  
 16 when you were in the presence of [REDACTED]  
 17 [REDACTED], Virginia Roberts and [REDACTED].  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. I don't recollect the story as told  
 21 by [REDACTED] or Virginia. I don't even know  
 22 who -- I remember the caricature of [REDACTED]  
 23 [REDACTED] and I remember [REDACTED] but I  
 24 don't recall anything else around the  
 25 caricature.

1 G Maxwell - Confidential  
 2 Q. Did you give it to him?  
 3 A. I did not.  
 4 Q. Who gave it to him?  
 5 A. I don't think it was given to him  
 6 at all.  
 7 Q. Did he bring it?  
 8 A. No.  
 9 Q. Was it something that was at the  
 10 house?  
 11 A. As best I recollect.  
 12 Q. Was it something that you saw at  
 13 the house in advance of [REDACTED]  
 14 arrival?  
 15 A. Again, I don't real -- I recollect  
 16 the caricature, I recollect [REDACTED], I  
 17 don't recollect much else around the  
 18 caricature.  
 19 Q. Was there a party going on in the  
 20 house at the time you recollect the  
 21 caricature?  
 22 MR. PAGLIUCA: Objection to the  
 23 form and foundation.  
 24 A. You have to be way more specific?  
 25 Q. Do you remember, you said you

1 G Maxwell - Confidential  
 2 recollect this caricature, you recollect  
 3 [REDACTED] being there. Do you recollect  
 4 a party going on at the time of that  
 5 interaction with [REDACTED] and the  
 6 caricature?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. I don't recollect a party -- first  
 10 of all, they weren't really parties -- I  
 11 don't recollect a party -- I don't know what  
 12 you mean by party in the context of that  
 13 scenario.  
 14 Q. Who do you recollect being at the  
 15 home during the time [REDACTED] was there  
 16 with this caricature?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. I only recollect myself with [REDACTED]  
 20 [REDACTED], I don't recollect anybody else.  
 21 Q. You don't recollect Jeffrey Epstein  
 22 being there?  
 23 A. Actually, no.  
 24 Q. You don't recollect [REDACTED]  
 25 being there?

1 G Maxwell - Confidential  
 2 A. No.  
 3 Q. You don't recollect Virginia  
 4 Roberts being there?  
 5 A. No.  
 6 Q. It was just you and [REDACTED]  
 7 A. I am not saying it was just me and  
 8 [REDACTED], you are asking me do you  
 9 remember. I only remember [REDACTED], I  
 10 remember [REDACTED] and the caricature but  
 11 I can't place the caricature and everybody  
 12 else in the same context, the same timeframe  
 13 you are asking me.  
 14 Q. [REDACTED]  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

<p style="text-align: right;">Page 294</p> <p>1        G Maxwell - Confidential    2        A. Typically, there is no typical    3        because there is no standard procedure, so I    4        can't comment or testify to [REDACTED]    5        [REDACTED].    6        Q. Do you remember them being in the    7        house?    8        A. Not specifically.    9        Do you mind if I take a bathroom    10      break.    11      THE VIDEOGRAPHER: It's now 3:51    12      and we are off the record.    13      (Recess.)    14      THE VIDEOGRAPHER: It's now 4:04.    15      We are back on the record and we're    16      starting disk No. 7.    17      Q. Ms. Maxwell, during what time    18      period, I know you said, I believe you said    19      you met Jeffrey in 1991, if I'm correct there    20      and you've known him through the present.    21      During what time period within    22      those years would you say your relationship    23      was the closest with Jeffrey?    24      MR. PAGLIUCA: Objection to the    25      form and foundation.</p>	<p style="text-align: right;">Page 296</p> <p>1        G Maxwell - Confidential    2        all -- sometime last year.    3        Q. So you haven't talked to him like,    4        for example, last week you didn't talk to    5        him?    6        A. I did not.    7        Q. How many times have you had either    8        direct or indirect, meaning, in the presence    9        of him or calling or emailing, contact with    10      Jeffrey Epstein from December 30, 2014 until    11      now?    12      A. I'm sorry, can you just --    13      Q. Either in person or by phone or by    14      email, from December 30, 2014 until present.    15      A. I can't really characterize that    16      but not very much. There was a period when    17      in January when you filed your, whatever you    18      filed, where we spoke and then, since then    19      not much at all.    20      Q. Can you estimate how many emails    21      you would have sent Jeffrey from the period    22      of December 30, 2014 to the present?    23      A. Not very many at all.    24      Q. More than 20?    25      A. I really wouldn't be able to</p>
<p style="text-align: right;">Page 295</p> <p>1        G Maxwell - Confidential    2        A. What do you mean by close, sorry.    3        Q. I think earlier today you testified    4        that at some point in time you considered    5        yourself to be his girlfriend, is that the    6        closest you would say that your relationship    7        was with him and if so, what time period was    8        that?    9        MR. PAGLIUCA: Objection to the    10      form and foundation.    11      A. I don't think I said I was his    12      girlfriend, I would like to think of myself    13      as maybe, I don't think I -- sometime in the    14      mid '90s.    15      Q. How close was your relationship?    16      A. We were very friendly.    17      Q. Without going into details, was    18      your relationship with him intimate?    19      A. Yes.    20      Q. When was the last time you had    21      contact with Jeffrey Epstein?    22      A. What do you mean by contact.    23      Q. Either a phone call or email or    24      anything of that nature?    25      A. As best as I can recollect when</p>	<p style="text-align: right;">Page 297</p> <p>1        G Maxwell - Confidential    2        characterize it because it wouldn't be that    3        many. I wouldn't know.    4        Q. More than 50?    5        A. It would be on the lesser side, not    6        on the more side.    7        Q. Can you give me a number?    8        A. I honestly couldn't. I would be    9        guessing.    10      Q. How many emails has Jeffrey sent    11      you from the period December 30, 2014 to the    12      present?    13      A. I would say less emails, even less    14      emails than I sent him.    15      Q. More than 20?    16      A. I would say on the lesser side.    17      Q. Less meaning 10?    18      A. I really can't recall, very little.    19      Q. When you spoke with Jeffrey in    20      January of 2015, what did he say to you?    21      A. I really couldn't remember exactly    22      what he said to me.    23      Q. Did you talk about Virginia    24      Roberts?    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    2        recall the exact conversation.    3        Q. Does Jeffrey Epstein send you text    4        messages?    5        A. No.    6        Q. Do you send him text messages?    7        A. No.    8        Q. How many phone calls have you had    9        with Jeffrey Epstein since December 30, 2014?    10       A. Again, very few.    11       Q. More than five?    12       A. Probably as many as the few emails    13       that I would characterize, so just very few.    14       I mean a small number.    15       Q. Are you aware of any disagreement    16       between your views about Virginia Roberts and    17       Jeffrey's views about Virginia Roberts?    18       MR. PAGLIUCA: Object to the form    19       and foundation    20       A. I cannot speculate to his views. I    21       can only testify on my views.    22       Q. Earlier you went through the series    23       of lies. Have you talked to Jeffrey about    24       the lies and does he agree with you?    25       A. I have discussed some of the issues</p>	<p style="text-align: right;">Page 300</p> <p>1        G Maxwell - Confidential    2        deny whether he had sex with Virginia    3        Roberts?    4        MR. PAGLIUCA: Objection to the    5        form and foundation.    6        A. I can't say what Jeffrey would say.    7        Q. Has he discussed that with you?    8        A. He has not.    9        Q. Would Jeffrey be able to confirm or    10       deny whether he had a sexual massage from    11       Virginia that first time she came to his    12       mansion in Palm Beach?    13       MR. PAGLIUCA: Objection to the    14       form and foundation.    15       A. I cannot speak for what he would    16       say. I can only speak for what I would say.    17       So as I testified everything that she said    18       about that first meeting didn't happen so...    19       Q. Has he told that you everything    20       about that first meeting didn't happen?    21       A. I know it didn't happen because she    22       put me in that room.    23       Q. I understand you know. But has    24       Jeffrey said when you are talking about the    25       obvious lies, oh yeah, that never happened?</p>
<p style="text-align: right;">Page 299</p> <p>1        G Maxwell - Confidential    2        with him, I can't remember specifically which    3        ones. I just don't recall. I'm sorry.    4        Q. Do you recall him telling you that    5        he didn't agree with you on any of those?    6        A. I don't recall him saying that.    7        Q. Do you have a joint defense    8        agreement with [REDACTED]    9        A. I believe I do.    10       Q. Do you have a joint defense    11        agreement with Alan Dershowitz?    12       A. I don't believe I do.    13       Q. Earlier today in your testimony,    14        when I was asking you some questions, you    15        said that you couldn't answer but that    16        Jeffrey Epstein could answer that question.    17        Would Jeffrey Epstein be in a    18        position to confirm or deny some of the    19        obvious lies that we've discussed today?    20        MR. PAGLIUCA: Objection to the    21        form and foundation.    22        A. I can't possibly testify to what    23        Jeffrey could or would say. I can't speak    24        for him.    25        Q. Would Jeffrey be able to confirm or</p>	<p style="text-align: right;">Page 301</p> <p>1        G Maxwell - Confidential    2        MR. PAGLIUCA: Objection to the    3        form and foundation.    4        A. I can't specifically recall that.    5        I don't know, but he has to agree with me    6        because it didn't happen.    7        Q. Can Jeffrey Epstein, would he be    8        able to confirm or deny whether he had sex    9        with underage girls?    10       MR. PAGLIUCA: Objection to the    11        form and foundation.    12        A. I can't testify to what Jeffrey    13        would say.    14        Q. Can Jeffrey confirm or deny whether    15        [REDACTED] was on Jeffrey's island?    16        MR. PAGLIUCA: Objection to the    17        form and foundation.    18        A. I can't say what Jeffrey would say.    19        I can only say what I know to be true.    20        Q. Has Jeffrey talked to you about the    21        fact whether [REDACTED] was on his island?    22        A. As best as I can recollect, he said    23        he was not on the island. As best as I can    24        recollect.    25        Q. Can Jeffrey Epstein confirm whether</p>

1 G Maxwell - Confidential  
 2 he and Virginia Roberts were together in the  
 3 presence of [REDACTED]  
 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 [REDACTED]  
 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 [REDACTED]  
 23 MR. PAGLIUCA: Objection to the  
 24 form and foundation.  
 25 A. Again, I'm not talking about what

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 [REDACTED]. 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 [REDACTED]  
 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 [REDACTED]

1 G Maxwell - Confidential  
 2 [REDACTED] 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 [REDACTED] 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 [REDACTED]  
 16 home for a massage?  
 17 A. Not to the best of my knowledge.  
 18 Q. Do you know one of [REDACTED]  
 19 [REDACTED] friend by the name of [REDACTED]  
 20 A. I do recollect a person of that  
 21 name.  
 22 Q. How do you know her?  
 23 A. I don't recollect.  
 24 Q. Did you meet her through Jeffrey?

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 [REDACTED]  
 6 [REDACTED] 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 [REDACTED] 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 [REDACTED]  
 25 [REDACTED]

1 G Maxwell - Confidential  
 2 A. Nothing really.  
 3 Q. Do you remember what she looks  
 4 like?  
 5 A. I would just be speculating on how  
 6 I remember. I couldn't describe her.  
 7 Q. Do you recall traveling with her?  
 8 A. I don't.  
 9 Q. Did you ever go to her home?  
 10 A. I don't believe I did.  
 11 Q. Do you know where she lives?  
 12 A. I don't.  
 13 Q. Would you have met her through  
 14 Jeffrey Epstein?  
 15 MR. PAGLIUCA: Objection to the  
 16 form and foundation.  
 17 A. I already testified I don't  
 18 recollect how I met her and I remember her  
 19 because her name is very unusual.  
 20 Q. So what's your -- what recollection  
 21 do you have of her, do you have a specific  
 22 recollection of meeting her somewhere, you  
 23 just don't know when that was or how do you  
 24 know that name. [REDACTED]  
 25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential  
 2 massages from her.  
 3 Q. Did you ever have any sexual  
 4 interaction with her?  
 5 MR. PAGLIUCA: Object to the form  
 6 and foundation and I'm going to instruct  
 7 you if we're talking about any  
 8 consensual adult contact, you are not  
 9 allowed to answer the question.  
 10 Q. Did you have any sexual contact  
 11 with her in the presence of Jeffrey Epstein?  
 12 MR. PAGLIUCA: Same instruction.  
 13 Q. Did you have any sexual contact  
 14 with her in the presence of anybody other  
 15 than Jeffrey Epstein?  
 16 MR. PAGLIUCA: Same instruction.  
 17 Q. How many massages did you receive  
 18 from [REDACTED]  
 19 A. I really don't recall but a fair  
 20 amount.  
 21 Q. Did the massages involve sex?  
 22 MR. PAGLIUCA: I'm going to  
 23 instruct you not to answer.  
 24 Q. Have you ever engaged in sex with  
 25 any female?

1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I don't know why the name is -- I'm  
 4 sorry -- I can't -- I have no idea. I  
 5 recognize the name but that's it.  
 6 Q. Was [REDACTED] a masseuse?  
 7 MR. PAGLIUCA: Objection to the  
 8 form and foundation.  
 9 A. What are you asking me, I'm sorry?  
 10 Q. When [REDACTED] worked for  
 11 Jeffrey Epstein, did she perform massages?  
 12 A. I've testified that when [REDACTED]  
 13 came originally, she came to answer  
 14 telephones. I believe at some point she  
 15 became a masseuse. I don't recollect when  
 16 and I personally had massages from [REDACTED]  
 17 Q. What did [REDACTED] do for Jeffrey  
 18 Epstein, did she perform massages, anything  
 19 else?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. When she came she answered phones  
 23 and at some point, I believe, I don't have  
 24 any firm recollection, but I believe she went  
 25 to school and became a masseuse and I had

1 G Maxwell - Confidential  
 2 MR. PAGLIUCA: I'm going to  
 3 instruct you not to answer.  
 4 MS. McCAWLEY: I want the record to  
 5 reflect that Ms. Maxwell's attorney is  
 6 directing her not to answer this series  
 7 of questions.  
 8 MR. PAGLIUCA: It definitely does.  
 9 Q. Were you responsible for  
 10 introducing [REDACTED] to Jeffrey Epstein?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I already testified that I don't  
 14 really recall [REDACTED].  
 15 Q. Were you responsible for  
 16 introducing [REDACTED] to Jeffrey Epstein?  
 17 MR. PAGLIUCA: Objection to the  
 18 form and foundation.  
 19 A. Again, I don't like the  
 20 characterization of introduction. [REDACTED]  
 21 came to answer telephones.  
 22 Q. When did you -- were you the person  
 23 who brought or introduced or met [REDACTED] for  
 24 purposes of bringing her to Jeffrey Epstein's  
 25 home?

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

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

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

<p style="text-align: right;">Page 322</p> <p>1        G Maxwell - Confidential  2        A. Yes.  3        Q. And then she began working for  4        Jeffrey?  5        A. Yes.  6        Q. Would you have provided whomever  7        was in charge of keeping this updated with  8        [REDACTED] cell number so you would be able to  9        contact her if needed?  10        MR. PAGLIUCA: Objection to the  11        form and foundation.  12        A. I don't know. It could have been a  13        number of different ways, it it could have  14        been Jeffrey who gave it to somebody.  15        Q. You just don't remember doing that?  16        A. I do not.  17        Q. Now, as you look -- I want you to  18        take a look at the Florida massage list, it's  19        three columns there.  20        Do you, as you look at those names  21        on the various columns, do you know the ages  22        of any of the girls in this list?  23        A. I don't know. One, I don't know  24        who all the people are on this list and I  25        certainly don't know the ages.</p>	<p style="text-align: right;">Page 324</p> <p>1        G Maxwell - Confidential  2        number of masseuses listed under the Florida  3        massage section?  4        A. When I was there, I would have, of  5        course there would have been some masseuses  6        listed but I could not tell you who or how  7        many and this -- I could not possibly because  8        I wouldn't remember.  9        Q. Do you know why Jeffrey would have  10        had so many names listed under his massage  11        Florida?  12        MR. PAGLIUCA: Objection to form  13        and foundation.  14        A. I can't testify to why Jeffrey has  15        so many.  16        Q. Did he use a different masseuse  17        every day?  18        MR. PAGLIUCA: Objection to the  19        form and foundation.  20        Q. You can answer.  21        A. When I was there he had a massage  22        roughly every day, one masseuse, and mostly  23        he would have them at random times, so it  24        would be difficult if you just only had one  25        person, man, woman, for an adult massage, to</p>
<p style="text-align: right;">Page 323</p> <p>1        G Maxwell - Confidential  2        Q. Do you know what their  3        qualifications are?  4        A. I don't know who the people are in  5        general so of course I don't know what their  6        qualifications are.  7        Q. Do you know why Jeffrey has so many  8        masseuses listed in Florida in his book here?  9        MR. PAGLIUCA: Objection to the  10        form and foundation.  11        A. Again, this book was created post  12        my departure, so I couldn't explain why all  13        these people were here.  14        Q. When you were there, you said this  15        book existed?  16        A. Yes.  17        Q. So when you were there, were there  18        a number of masseuses listed under the  19        Florida massage?  20        MR. PAGLIUCA: Objection to the  21        form and foundation and  22        mischaracterization of the witness'  23        testimony.  24        Q. I'm asking you a question.  25        When you were there, were there a</p>	<p style="text-align: right;">Page 325</p> <p>1        G Maxwell - Confidential  2        come and be available for whatever time it  3        was. So he would have more than one person  4        that he could call for a massage because at  5        any given time the one that he called first  6        may not have been available.  7        Q. So would it typically be a  8        different person each day that would give him  9        a massage?  10        MR. PAGLIUCA: Objection to the  11        form and foundation.  12        A. It would be, when I was there,  13        based on availability.  14        Q. Would it surprise you to learn that  15        the Federal Government found that some of the  16        girls on this list under massage Florida were  17        under the age of 18?  18        MR. PAGLIUCA: Objection to the  19        form and foundation.  20        A. I can't testify to what the  21        government found or did not find because I  22        would have no knowledge of it.  23        Q. I'm asking if you would be  24        surprised by that?  25        MR. PAGLIUCA: Form and foundation.</p>

1 G Maxwell - Confidential  
 2 A. I have knowledge of it. I can't  
 3 speculate.  
 4 Q. On the second column, towards the  
 5 bottom, there is the name, it's one up from  
 6 the bottom, there is the name [REDACTED]  
 7 do you know [REDACTED]  
 8 A. I do.  
 9 Q. Who is she?  
 10 A. She was a friend of Jeffrey's.  
 11 Q. Is she a masseuse?  
 12 A. She, I don't think she was a  
 13 masseuse, no.  
 14 Q. Why would be she listed under  
 15 Florida massages?  
 16 A. An input error.  
 17 Q. Is this list any individual that  
 18 would have sex with Jeffrey?  
 19 MR. PAGLIUCA: Objection to the  
 20 form and foundation.  
 21 A. I wouldn't have any knowledge of  
 22 that.  
 23 Q. Do you know if Jeffrey had sex with  
 24 [REDACTED]  
 25 MR. PAGLIUCA: Object to the form

1 G Maxwell - Confidential  
 2 and foundation.  
 3 A. First of all, I wouldn't have any  
 4 knowledge of that.  
 5 MS. McCAWLEY: We are going to take  
 6 a quick break.  
 7 THE VIDEOGRAPHER: It's now 4:39  
 8 and we are off the record.  
 9 (Recess.)  
 10 THE VIDEOGRAPHER: It's now 4:54  
 11 and we are as back on the record  
 12 starting disk number 8.  
 13 Q. Ms. Maxwell, we were talking  
 14 earlier about the journal and I believe you  
 15 said in 2004, 2005, you were no longer  
 16 working and responsible for that journal, is  
 17 that correct?  
 18 MR. PAGLIUCA: Objection to the  
 19 form and foundation.  
 20 A. What are we referring to, this  
 21 document right here?  
 22 Q. Yes.  
 23 A. I don't know who is the author of  
 24 this or I can't tell you what is in here  
 25 versus what would have been here when I was

1 G Maxwell - Confidential  
 2 around. I can't testify to that.  
 3 Q. Were you around in 2004, 2005?  
 4 A. I already testified that I was  
 5 there when Jeffrey's mother passed away and  
 6 so you know, I did visit for her passing and  
 7 I believe I was there for a couple of days in  
 8 2005.  
 9 Q. So if an employee of Mr. Epstein in  
 10 2004 said that you were the employee's direct  
 11 supervisor, would that be incorrect?  
 12 MR. PAGLIUCA: Objection to form  
 13 and foundation.  
 14 A. What employee, what's the  
 15 circumstances and what is the story, I don't  
 16 know what you are asking me.  
 17 Q. If [REDACTED] said in 2004  
 18 when he was hired, you were his direct  
 19 supervisor, would that be true?  
 20 A. No.  
 21 Q. Were you in 2004 supervising [REDACTED]  
 22 [REDACTED]  
 23 MR. PAGLIUCA: Objection to form  
 24 and foundation.  
 25 A. I never supervised [REDACTED]

1 G Maxwell - Confidential  
 2 Q. Did [REDACTED] take orders from  
 3 you?  
 4 MR. PAGLIUCA: Objection to the  
 5 form and foundation.  
 6 A. She worked for Jeffrey.  
 7 Q. If [REDACTED] said you had  
 8 knowledge of underage girls coming to  
 9 Jeffrey's home for the purpose of sex, would  
 10 you contend that that is truthful?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation of the question.  
 13 A. I have no idea what you are talking  
 14 about, I'm sorry.  
 15 Q. If [REDACTED] said that you  
 16 have knowledge of underage girls coming to  
 17 Jeffrey's home for the purpose of having  
 18 massages involving sex, would you say that  
 19 that statement is truthful?  
 20 MR. PAGLIUCA: Objection to the  
 21 form and foundation.  
 22 A. I can't testify to what [REDACTED]  
 23 said or didn't say.  
 24 Q. I'm saying if [REDACTED] said that you  
 25 had knowledge that there were girls coming

<p style="text-align: right;">Page 330</p> <p>1        G Maxwell - Confidential    2 over to the house that were underage for the    3 purposes of sex, would that statement be    4 true?    5        MR. PAGLIUCA: Objection to form    6 and foundation.    7        A. I can't testify to what [REDACTED]    8 said or didn't say or what he thought.    9        Q. Did you have knowledge of underage    10 girls coming to Jeffrey Epstein's house for    11 the purpose of sex?    12        A. No.    13        Q. Earlier I believe you testified,    14 correct me if I'm wrong, that the document    15 that is in front of you, the thicker document    16 was a stolen document.    17        Do you know who stole that    18 document?    19        A. I have read that [REDACTED] stole the    20 document.    21        Q. And where have you read that?    22        A. I believe it was reported in the    23 press.    24        Q. Earlier we were talking about the    25 computers at Jeffrey Epstein's home. Did you</p>	<p style="text-align: right;">Page 332</p> <p>1        G Maxwell - Confidential    2 of this document being on it, so I don't know    3 where this came from.    4        Q. I understand the computer at the    5 house that you're referencing. On a personal    6 computer of yours, did you have that    7 document?    8        A. I don't know where this document    9 came from, so I can't possibly say this    10 document was on any computer that I may have    11 had access to.    12        Q. On a personal computer of your own,    13 did you have lists of the phone numbers and    14 contact information relating to Jeffrey    15 Epstein?    16        A. Like everybody, I have an address    17 book but I can't possibly testify to where    18 this thing came from.    19        Q. Was it your address book or was it    20 addresses that related to Jeffrey Epstein?    21        MR. PAGLIUCA: Objection to the    22 form and foundation.    23        A. I don't know what you're asking me.    24        Q. On your personal computer, the    25 address book you are referencing, was it your</p>
<p style="text-align: right;">Page 331</p> <p>1        G Maxwell - Confidential    2 have a computer that was your computer    3 located in Jeffrey Epstein's home?    4        MR. PAGLIUCA: Objection to form    5 and foundation.    6        A. I've testified to the computer    7 already. Even when I was around, there was a    8 computer that people had access to.    9        Q. So is [REDACTED] telling the    10 truth when he says that he downloaded that    11 book from your computer?    12        MR. PAGLIUCA: Objection to the    13 form and foundation.    14        A. I couldn't possibly tell you what    15 [REDACTED] did or didn't do or said or didn't    16 say.    17        Q. Was it on your computer?    18        A. I already testified I have no idea    19 where this document came from.    20        Q. Did you have a list of names of    21 individuals with contact information for    22 Jeffrey Epstein on your personal computer?    23        A. Again, that wasn't my computer. I    24 already said that was a computer that lots of    25 people would have, so I have no recollection</p>	<p style="text-align: right;">Page 333</p> <p>1        G Maxwell - Confidential    2 address book with individuals you knew or was    3 it an address book for your employer, Jeffrey    4 Epstein?    5        A. Jeffrey has his situation and I    6 have no -- this is Jeffrey's, it came from    7 his home, so I can't testify to anything    8 about this in that period of time.    9        Q. So you didn't have on your computer    10 a list of contact information for individuals    11 that was related to Jeffrey Epstein?    12        A. I don't recall exactly what I had    13 back in 2004 and 2005, so I can't say what I    14 had back then that relates to his addresses,    15 I can't recall.    16        Q. So is it possible that someone    17 could have downloaded from your personal    18 computer a list of names and address that    19 were affiliated with Jeffrey Epstein?    20        MR. PAGLIUCA: Objection to the    21 form and foundation.    22        A. This didn't come from any computer    23 of mine.    24        Q. But is it possible that someone    25 could have downloaded a list of names and</p>

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

<p style="text-align: right;">Page 338</p> <p>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.</p>	<p style="text-align: right;">Page 340</p> <p>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</p>
<p style="text-align: right;">Page 339</p> <p>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 [REDACTED] 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 [REDACTED] 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.</p>	<p style="text-align: right;">Page 341</p> <p>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: Objection 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 you with more than    25 one car?</p>

<p style="text-align: right;">Page 342</p> <p>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</p>	<p style="text-align: right;">Page 344</p> <p>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</p>
<p style="text-align: right;">Page 343</p> <p>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?</p>	<p style="text-align: right;">Page 345</p> <p>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.</p>

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 [REDACTED]  
 11 [REDACTED] 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

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 [REDACTED]  
 25 have that document?

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 [REDACTED] who  
 22 you've identified as your [REDACTED] on  
 23 February 24, 2015 to [REDACTED] which I understand  
 24 to be your email address and [REDACTED].  
 25 The subject line says, VR cried rape. Prior

1 G Maxwell - Confidential  
 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 [REDACTED] leaking to the  
 16 press?

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

19 A. It doesn't say [REDACTED] 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  2        information to the press information about  3        the subject line, VR cried rape, prior case  4        dismissed as prosecutors found her not  5        credible?  6        A. I don't no idea what [REDACTED] is  7        referring to. I think he is referring to the  8        press held the story. I couldn't testify to  9        that.  10       Q. Did you leak to the press  11       information regarding the statement, VR cried  12       rape prior case dismissed as prosecutors  13       found her not credible, either through you or  14       through [REDACTED]  15       A. I think this is coming from the  16       daily mail.  17       Q. That is not my question, I'm asking  18       whether you or [REDACTED] leaked that?  19       A. I have no knowledge, I have no  20       idea, I'm sorry. I can't -- I have no  21       recollection. I have no idea what she is  22       talking about.  23       Q. I'm going to mark this as 16?  24       (Maxwell Exhibit 16 email marked  25       for identification.)</p>	<p style="text-align: right;">Page 352</p> <p>1        G Maxwell - Confidential  2        false?  3        A. He did not.  4        Q. Do you know whether Jeffrey Epstein  5        paid [REDACTED] to give testimony about  6        Virginia Roberts?  7        A. I don't know who [REDACTED] is.  8        Q. So you don't know whether Jeffrey  9        Epstein paid her?  10       A. I don't know who [REDACTED] is.  11       Q. Have you ever contacted any of  12       Virginia's friends, acquaintances or family  13       regarding this case?  14       A. I don't know who Virginia's friends  15       or family are and I have not contacted  16       anybody related to her in any way, shape or  17       form.  18       Q. I will turn you, I believe it's the  19       thicker document which is Maxwell, I believe  20       it was 14, right there, the compilation  21       document to GM, at the bottom, GM 00071. You  22       actually may want to turn to the prior page  23       70 so you can see the email chain. At the  24       top of the page --  25       MR. PAGLIUCA: I don't have a 00071</p>
<p style="text-align: right;">Page 351</p> <p>1        G Maxwell - Confidential  2        Q. This is an email addressed at the  3        top from Jeffrey Epstein on Monday, January  4        12, 2015 to [REDACTED] which I understand to be  5        your email address. The email reads, You can  6        issue a reward to any of Virginia's friends,  7        aquaints, family, that come forward to help  8        prove her allegations are false. The  9        strongest is the [REDACTED] dinner and the new  10       version of the Virgin Islands that [REDACTED]  11       [REDACTED] practiced in an underage orgy.  12       Did you offer any rewards to  13       Virginia's family or friends to contradict  14       Virginia's story?  15       A. Absolutely not.  16       Q. Did Jeffrey Epstein offer any  17       rewards to any of Virginia's, as he suggests  18       here, friends, family or acquaintances to  19       contradict Virginia's story?  20       MR. PAGLIUCA: Objection to the  21       form and foundation.  22       A. I have no idea what he did.  23       Q. Did he tell he was going to offer  24       rewards to Virginia's acquaintances, friends  25       and family to prove her allegations were</p>	<p style="text-align: right;">Page 353</p> <p>1        G Maxwell - Confidential  2        on mine.  3        MS. McCAWLEY: It's the second page  4        in that document.  5        MR. PAGLIUCA: Okay.  6        Q. It's dated Friday March 11, 2011  7        from Maxwell to Jeffrey with the title, Daily  8        Mail and there is a forward from [REDACTED] to  9        you and a number of other individuals, that's  10       on the cover page and as you scroll to the  11       second page, you are going to see that part  12       of the chain that I'm asking about and that  13       is the chain at the bottom which is dated  14       3/10/2011 from [REDACTED] and it says we  15       think -- we should think about the letter to  16       the editor. School can be university. Age  17       of consent in Florida is complex. See below,  18       if you are 16 years old, a sexual  19       relationship with someone between 18 and 24  20       is legal in Florida. Two persons between 16  21       and 24, Florida statute 794.05. A person 24  22       years or of age or older who engages in  23       sexual activity with a person 16 or 17 years  24       of age commits a felony in the second degree.  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    2 have sexual relations and you can have sexual    3 relations with a minor under the age of 18    4 until your 24th birthday.</p> <p>5        Why were you concerned with the age    6 of consent in Florida?</p> <p>7        MR. PAGLIUCA: Objection to the    8 form and foundation of the question.</p> <p>9        A. I wasn't concerned. I think this    10 was somebody sending me the statute for    11 informational purposes.</p> <p>12       Q. Who is [REDACTED]    13       A. He is the person who, [REDACTED]    14 boss I believe, I don't know what the    15 relationship is.</p> <p>16       Q. I didn't hear you?    17       A. I [REDACTED], I'm not    18 sure exactly.</p> <p>19       Q. Why would he be sending you    20 information addressing concerns about the age    21 of consent in Florida?</p> <p>22       MR. PAGLIUCA: Objection to the    23 form and foundation.</p> <p>24       A. I think he was just trying to be --    25 telling me details that would happen,</p>	<p style="text-align: right;">Page 356</p> <p>1        G Maxwell - Confidential    2 Q. I'm going to turn you now in that    3 same stack the Bates number GM 00088. At the    4 top of the email you are going to see Jeffrey    5 Epstein, dated June 8, 2011, to you and it's    6 got a re line, Vanity Fair. If you go down    7 the chain you will see where it says under    8 your email, Do you have a problem with    9 anything I said.</p> <p>10       Were you communicating with Jeffrey    11 to confirm what statements you could put in    12 any press releases you were given?</p> <p>13       MR. PAGLIUCA: Objection to the    14 form and foundation.</p> <p>15       A. Any interest I have is in accuracy.</p> <p>16       Q. Were you confirming with Jeffrey    17 Epstein what information you could put in    18 press releases?</p> <p>19       MR. PAGLIUCA: Objection to the    20 form and foundation.</p> <p>21       A. Again, I'm only looking for    22 accuracy.</p> <p>23       Q. Why would you ask him if he had a    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    2 Virginia in '11 was claiming she was 15 and    3 we thought she was 17. I didn't know what    4 the statutes were in Florida and I think he    5 was just trying to be helpful so I would    6 know.</p> <p>7       Q. Did you have a concern that you had    8 violated this statute in Florida?</p> <p>9       MR. PAGLIUCA: Objection to the    10 form and foundation.</p> <p>11       A. No.</p> <p>12       Q. Did you have a concern that Jeffrey    13 Epstein had violated this statute in Florida?</p> <p>14       A. I'm not concerned what happened    15 with Jeffrey. I'm only concerned what    16 happens with me.</p> <p>17       Q. Why did you communicate with [REDACTED]    18 [REDACTED] about the sexual consent age in    19 Florida?</p> <p>20       MR. PAGLIUCA: Objection to the    21 form and foundation. It misstates her    22 testimony.</p> <p>23       A. I wasn't concerned. I think he was    24 being helpful and stating what the statute    25 was.</p>	<p style="text-align: right;">Page 357</p> <p>1        G Maxwell - Confidential    2 characterized that was not correct.</p> <p>3       Q. That's not what you said. You    4 said, do you have a problem with anything I    5 said.</p> <p>6       MR. PAGLIUCA: Objection to the    7 form and foundation. There is no    8 question pending.</p> <p>9       MS. McCAWLEY: There is.</p> <p>10       MR. PAGLIUCA: That's not a    11 question, it's a statement.</p> <p>12       MS. McCAWLEY: Don't interrupt me.</p> <p>13       Q. Do you say, do you have a problem    14 with anything I said?</p> <p>15       A. That was asking in my parlance that    16 I wanted him to check it for accuracy.</p> <p>17       Q. Did he tell you there was anything    18 inaccurate about the statement?</p> <p>19       A. Again, I have to read the whole    20 thing to figure that out.</p> <p>21       Q. Were you coordinating with Jeffrey    22 Epstein during this time period in 2011    23 regarding statements that you were issuing to    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  2        last question.  3        MS. McCAWLEY: I'm not withdrawing  4        anything. I'm asking a question.  5        MR. PAGLIUCA: There was a question  6        pending. You didn't let the witness  7        answer the question, then you moved on  8        to another question so I'm asking for  9        clarification for the record now which  10       question are we answering.  11       MS. McCAWLEY: There is an answer.  12       The question was did he tell you  13       anything, there was anything in the  14       statement inaccurate about the statement  15       and she said again, I read the whole  16       thing --  17       THE WITNESS: I would have to.  18       MS. McCAWLEY: -- I would have to  19       read the whole thing to figure that out.  20       MR. PAGLIUCA: Then she started  21       reading it and you asked another  22       question.  23       MS. McCAWLEY: That's the question.  24       MR. PAGLIUCA: I'm wondering if its  25       still pending.</p>	<p style="text-align: right;">Page 360</p> <p>1        G Maxwell - Confidential  2        MR. PAGLIUCA: Objection to the  3        form and foundation.  4        A. I was not coordinating with  5        Jeffrey. He had details that I did not have.  6        I was not party to his case. I needed to  7        have information in order to be able to  8        respond so I was not coordinating with him.  9        I was merely asking for details that I could  10       have.  11       Q. Did Jeffrey write any of your press  12       statements for you?  13       A. No.  14       Q. He didn't draft any of them?  15       A. I have a lawyer who was working on  16       this and that was -- I asked, I believe as I  17       recollect asked him for information to make  18       sure I was being accurate in the  19       representations for whatever I was  20       discussing.  21       Q. Did Jeffrey provide you with any  22       drafts of statements to provide to the press?  23       A. I only recall drafts from my  24       lawyer.  25       Q. I will mark this as Maxwell 17.</p>
<p style="text-align: right;">Page 359</p> <p>1        G Maxwell - Confidential  2        MS. McCAWLEY: It was answered.  3        Q. Were you coordinating with Jeffrey  4        Epstein during the time period in 2011  5        regarding the statements you were issuing to  6        the press?  7        MR. PAGLIUCA: Objection to the  8        form and foundation.  9        A. I only wanted to be accurate in any  10        factual statements that I made.  11        Q. You knew at that time that Jeffrey  12        Epstein had been convicted for sexual abuse  13        of a minor, is that correct?  14        MR. PAGLIUCA: Objection to form  15        and foundation.  16        A. He was sentenced I believe for  17        underage -- soliciting an underaged  18        prostitute.  19        Q. You knew that he was a registered  20        sex offender?  21        A. Yes.  22        Q. You were coordinating with him the  23        statement that you were going to be making to  24        the press to confirm whether they were  25        accurate in your words?</p>	<p style="text-align: right;">Page 361</p> <p>1        G Maxwell - Confidential  2        (Maxwell Exhibit 17, email, marked  3        for identification.)  4        Q. This is an email from you on  5        January 10, 2015 to [REDACTED]  6        [REDACTED]. The statement you had before you  7        earlier, that, if you can pull that in front  8        of you, the one page press release that you  9        gave. You might know from memory.  10       Was the press release that you  11       issued with the statement about Virginia  12       issued in or around January 2, 2015?  13       A. As best as I can recollect.  14       Q. I want to turn your attention to  15       the document I just handed you which is Bates  16       No. 001044, from you to [REDACTED] and  17       [REDACTED]. It says in the first sentence, I'm  18       out of my depth to understand defamation,  19       other legal hazards and I don't want to end  20       up in a lawsuit aimed at me from anyone, if I  21       can help it. Apparently, even saying  22       Virginia is a liar has hazards.  23       You knew at the time you called  24       Virginia a liar in early January of 2015 that  25       that was something that would result in a</p>

1 G Maxwell - Confidential  
 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

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?

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.

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

1 G Maxwell - Confidential  
 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 have 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

1 G Maxwell - Confidential  
 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 labeled 001060. At the top is a chain

1 G Maxwell - Confidential  
 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 [REDACTED], 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 [REDACTED] 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 [REDACTED]  
 13 [REDACTED] responding to that letter?  
 14 A. I do.  
 15 Q. So that would be [REDACTED]  
 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 [REDACTED] 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

1 G Maxwell - Confidential  
 2 email to you says, quote, Careful.  
 3 A. Is that to me or to [REDACTED]  
 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 [REDACTED] 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?

<p style="text-align: right;">Page 370</p> <p>1 G Maxwell - Confidential    2 A. I have every email that you asked    3 for in discovery, that I have I gave you.    4 Q. That's not my question.    5 Did you ever delete emails in    6 January of 2015?    7 A. I have not deleted anything that    8 you have asked me for in discovery. I have    9 given you everything that I have.    10 Q. That is not my question, my    11 question is, did you ever delete emails in    12 January of 2015?    13 A. In the normal course of my work,    14 there are emails from spam that I delete.    15 That is the type of email I've deleted.    16 Anything that is material to what you want, I    17 have not deleted.    18 Q. How do you know that?    19 A. Well, anybody that's to do with    20 Jeffrey or [REDACTED] or women or anything of which    21 I know you were interested in, of which I    22 have anything I would not have done because I    23 don't want to subject myself to...    24 Q. Have you had your computer    25 forensically copied for purposes of this</p>	<p style="text-align: right;">Page 372</p> <p>1 G Maxwell - Confidential    2 Q. Earlier today, you said you were in    3 the process of resolving the sale of your    4 town home. Where do you intend to live once    5 your town home is sold?    6 A. That's a good question. I don't    7 have an answer for you yet.    8 Q. You don't have a present plan. Do    9 you intend to live in the United States?    10 A. I don't have a present plan.    11 Q. Are you living outside of your town    12 home right now or are you still there?    13 A. I'm just couch surfing.    14 Q. Has Jeffrey Epstein ever purchased    15 a company for you or put a company in your    16 name?    17 MR. PAGLIUCA: Objection to the    18 form and foundation.    19 A. I have no recollection.    20 Q. Is there a Ghislaine Maxwell    21 corporation, for example?    22 A. No, not that I am aware of that has    23 anything to do with me. There may be with    24 one that someone else owns or started but not    25 one that is related to me.</p>
<p style="text-align: right;">Page 371</p> <p>1 G Maxwell - Confidential    2 litigation?    3 MR. PAGLIUCA: Objection to the    4 form and foundation.    5 A. Has someone made a copy of your    6 computer for purposes of this litigation.    7 A. No.    8 Q. Are you a citizen of the United    9 States?    10 A. I am.    11 Q. Are you also a citizen of England?    12 A. I am.    13 Q. Are you a citizen of any other    14 land?    15 A. TerraMar.    16 Q. That's the name of your charity    17 project that deals with oceans, is that    18 correct?    19 A. Yeah. I'm French as well.    20 Q. Has Jeffrey Epstein funded TerraMar    21 for you?    22 A. He did give some money to TerraMar,    23 yes.    24 Q. How much?    25 A. I believe it was \$50,000.</p>	<p style="text-align: right;">Page 373</p> <p>1 G Maxwell - Confidential    2 MS. McCAWLEY: I'm going to take a    3 short break and make sure to keep it    4 short because I know you wanted to -- I    5 just want to wrap up what we have left.    6 THE VIDEOGRAPHER: It's now 5:49 we    7 are off the record.    8 (Recess.)    9 THE VIDEOGRAPHER: It's now 6:00    10 p.m. and we are back on the record.    11 Q. Ms. Maxwell, do you recall being    12 subpoenaed for a deposition back in 2009?    13 A. I do.    14 Q. Why did you avoid giving your    15 deposition in that case when you were    16 subpoenaed and had the opportunity to tell    17 your side of the story?    18 MR. PAGLIUCA: Objection to the    19 form and foundation.    20 A. That's not what happened.    21 Q. What happened?    22 A. As I best recall, I was subpoenaed    23 and a date was set for the subpoena and    24 everything was set and I believe it was with    25 Brad Edwards, correct me if I'm wrong, and</p>

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 [REDACTED], I  
 15 believe, you know, is when fake suits were  
 16 created in Jeffrey's case and [REDACTED]  
 17 [REDACTED] 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 [REDACTED] 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

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

1 G Maxwell - Confidential  
 2 Edwards resurfaced after the [REDACTED],  
 3 [REDACTED] 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 [REDACTED]  
 25 A. I am.

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

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

<p style="text-align: right;">Page 386</p> <p>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.</p>	<p style="text-align: right;">Page 388</p> <p>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 &amp; 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.</p>
<p style="text-align: right;">Page 387</p> <p>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: Objection 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</p>	<p style="text-align: right;">Page 389</p> <p>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?</p>

<p style="text-align: right;">Page 390</p> <p>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</p>	<p style="text-align: right;">Page 392</p> <p>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?</p>
<p style="text-align: right;">Page 391</p> <p>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 [REDACTED], [REDACTED]  8 [REDACTED] and above that  9 there is a message from a [REDACTED]  10 [REDACTED].  11 Do you see that?  12 A. Uh-huh.  13 Q. Do you know who [REDACTED] is?  14 A. I do not.  15 Q. Above that there is a message from  16 [REDACTED] 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,</p>	<p style="text-align: right;">Page 393</p> <p>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>

1 G Maxwell - Confidential  
 2 A. Insofar as this is the case, it's  
 3 really all about Jeffrey, it's not a case  
 4 about me.  
 5 Q. In 2009, did you direct your  
 6 lawyer, either directly or indirectly, to  
 7 tell Brad Edwards that you were unavailable  
 8 to attend a deposition?  
 9 MR. PAGLIUCA: Objection to the  
 10 form and foundation. And this is a  
 11 privileged communication as I understand  
 12 the question, what someone said or  
 13 didn't say to their lawyer. So don't  
 14 answer the question.  
 15 Q. Can you answer that question  
 16 without revealing a privileged communication?  
 17 A. Can you ask the question again?  
 18 Q. In 2009, did you direct your lawyer  
 19 to tell Brad Edwards that you were  
 20 unavailable to attend a deposition?  
 21 MR. PAGLIUCA: Same instruction.  
 22 Q. Did you make any statement in 2009  
 23 to anybody that you were unavailable to  
 24 attend a deposition?  
 25 A. My mother was sick and I don't

1 G Maxwell - Confidential  
 2 recall exactly the sequence of events but  
 3 what sequence of events do exist are -- was  
 4 handled by my lawyers.  
 5 Q. What is your understanding of  
 6 Jeffrey Epstein's nonprosecution agreement?  
 7 A. I have no idea.  
 8 Q. Do you have an understanding of the  
 9 co-conspirators listed in the nonprosecution  
 10 agreement?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation.  
 13 A. I have no knowledge of his  
 14 agreement, whatever that is.  
 15 Q. Do you know, you mentioned earlier  
 16 today that [REDACTED] was one of the listed  
 17 co-conspirators.  
 18 Do you know who the other  
 19 co-conspirators are in the nonprosecution  
 20 agreement?  
 21 MR. PAGLIUCA: Objection to the  
 22 form and foundation.  
 23 A. I do not know.  
 24 Q. What did Jeffrey Epstein tell you  
 25 about the nonprosecution agreement?

1 G Maxwell - Confidential  
 2 A. I don't think I've ever discussed  
 3 it with him.  
 4 Q. How did you come to learn that  
 5 [REDACTED] was covered by the  
 6 nonprosecution agreement?  
 7 A. I believe I read it in the press.  
 8 Q. Did you have any discussions with  
 9 [REDACTED] with about the nonprosecution  
 10 agreement?  
 11 A. I have not had any discussions with  
 12 [REDACTED].  
 13 Q. When is the last time you spoke to  
 14 [REDACTED]  
 15 A. Maybe 2005, 2006 maybe.  
 16 Q. And same with [REDACTED],  
 17 when is the last time you recall speaking  
 18 with [REDACTED]  
 19 A. Probably even more time before  
 20 that, maybe -- I've never had communications  
 21 really with [REDACTED].  
 22 Q. I'm sorry, I didn't hear that.  
 23 A. I never had communications with  
 24 her.  
 25 Q. You were working for Jeffrey at the

1 G Maxwell - Confidential  
 2 same time [REDACTED] was also working for Jeffrey,  
 3 isn't that correct?  
 4 A. I didn't know what [REDACTED] did for  
 5 Jeffrey so I didn't characterize what her  
 6 relationship or work or not was and I was  
 7 still helping him with his construction  
 8 projects and the like but I never crossed  
 9 paths with [REDACTED].  
 10 Q. What did you think [REDACTED] was doing  
 11 for Jeffrey?  
 12 A. I have no idea what [REDACTED] was doing  
 13 for Jeffrey.  
 14 Q. Did you observe [REDACTED] at any of  
 15 Jeffrey's houses while you were there?  
 16 A. She was at the house on occasion.  
 17 Q. What would she be doing there?  
 18 A. I have no idea.  
 19 Q. Did you know if she lived at his  
 20 houses?  
 21 A. I have no idea.  
 22 Q. Did you ever go into a bedroom and  
 23 see her belongings at one of the houses?  
 24 A. Not that I recall, no.  
 25 Q. I'm going to mark this as Maxwell

1 G Maxwell - Confidential  
 2 Exhibit 24?  
 3 (Maxwell Exhibit 24, email, marked  
 4 for identification.)  
 5 Q. You can see at the top of the first  
 6 page which is GM 0001, it's dated January 3,  
 7 2015 from you to the [REDACTED].  
 8 Is that [REDACTED] who we  
 9 referred to today?  
 10 A. Yes.  
 11 Q. And can you tell me, it says, Have  
 12 some info. Call me when you have a moment.  
 13 What is redacted there?  
 14 A. I don't recall, I'm sorry.  
 15 Q. Do you know why there is a  
 16 redaction on this document?  
 17 A. You would have to confer with my  
 18 lawyers.  
 19 Q. What did you discuss on that call?  
 20 A. I don't have any specific knowledge  
 21 of that call.  
 22 Q. So the call is being made on  
 23 Saturday, January 3, 2015?  
 24 MR. PAGLIUCA: Objection to the  
 25 form and foundation.

1 G Maxwell - Confidential  
 2 Q. The document states, it's Saturday  
 3 January 3, 2015. You issued your press  
 4 release on January 2, 2015.  
 5 Were you discussing with [REDACTED]  
 6 [REDACTED] the subject of Virginia Roberts during  
 7 these calls?  
 8 MR. PAGLIUCA: Objection to the  
 9 form and foundation.  
 10 A. I don't know if I spoke to him.  
 11 Q. I would like you to turn to GM 0002  
 12 and the bottom chain says [REDACTED],  
 13 Saturday January 3, to [REDACTED], re, and he says  
 14 let me know when we can talk. Got some  
 15 specific questions to ask you about Virginia  
 16 Roberts.  
 17 Do you recall having a conversation  
 18 with [REDACTED] about Virginia Roberts in  
 19 or around early January of 2015?  
 20 A. I don't know if we actually spoke.  
 21 Q. Did you ever speak to [REDACTED]  
 22 about Virginia Roberts after you issued your  
 23 statement on January 2, 2015?  
 24 A. I know that we did speak at some  
 25 point but I don't recollect when we spoke.

1 G Maxwell - Confidential  
 2 Q. What did you talk about?  
 3 A. Just what a liar she is.  
 4 Q. What did he say to you?  
 5 A. What a liar she is.  
 6 Q. Did he tell you why he thought she  
 7 was a liar?  
 8 A. I don't think he told me why she  
 9 was a liar. The substance of everything that  
 10 she said was a lie with regard to him.  
 11 Q. What did you say to him?  
 12 A. She is a liar.  
 13 Q. That was the whole conversation, it  
 14 was you said to him, she is a liar and he  
 15 said to you she say liar and did you discuss  
 16 any of the details about what those lies  
 17 were?  
 18 A. I don't recollect.  
 19 Q. Was that only one conversation you  
 20 had?  
 21 A. I don't recollect. I don't  
 22 recollect actually the conversation but other  
 23 than -- in detail other than we both said she  
 24 was a liar.  
 25 Q. Do you regularly communicate with

1 G Maxwell - Confidential  
 2 [REDACTED]  
 3 MR. PAGLIUCA: Objection to the  
 4 form and foundation.  
 5 A. What do you mean by regularly.  
 6 Q. Do you email with him once a month,  
 7 once every two months or text him or call  
 8 him?  
 9 A. No, we are not in that type of  
 10 regular touch.  
 11 Q. Do you travel with him regularly?  
 12 A. I don't know, I have traveled with  
 13 him. We have traveled together but regularly  
 14 is not a correct characterization.  
 15 Q. Do you travel with him more than  
 16 once a year?  
 17 A. There is no standard. There is no  
 18 set pattern. The answer to that was no.  
 19 Q. Have you ever observed him with any  
 20 underage, any women, female under the age of  
 21 18, interacting, that's not a child or a  
 22 family friend, interacting for the purposes  
 23 of a sexual relationship with that  
 24 individual?  
 25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I've never seen [REDACTED] interact in  
 4 any way of that nature.  
 5 Q. Have you ever gone to dinner with  
 6 him with any individual under the age of 18  
 7 that's not a family member or friend of yours  
 8 that is under the age of 18?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. We've been to dinner all the time,  
 12 I am not not sure who is at dinner with us, I  
 13 can't testify to that.  
 14 Q. Has he ever brought a female under  
 15 the age 18 that's not a relative of his --  
 16 A. He has children.  
 17 Q. I said not relatives.  
 18 A. I can't possibly testify to who he  
 19 comes to dinner with, I wouldn't recall.  
 20 Q. To your knowledge, has he ever had  
 21 a relationship with any female under the age  
 22 of 18 for purposes of a romantic relationship  
 23 to your knowledge?  
 24 A. I can't testify to [REDACTED]  
 25 relationship.

1 G Maxwell - Confidential  
 2 Q. You haven't observed that?  
 3 A. No.  
 4 Q. Have you talked to [REDACTED]  
 5 about coming to testify at trial in this  
 6 case?  
 7 A. No.  
 8 Q. When was the last time you  
 9 communicated with [REDACTED]  
 10 A. 1994, 1995.  
 11 Q. I believe earlier, did you say that  
 12 you -- when is the last time you've been to  
 13 his home in [REDACTED]  
 14 A. I said -- you asked me if I stayed  
 15 the night.  
 16 Q. I'm asking you a different  
 17 question. When is the last time you have  
 18 been to his home in [REDACTED]  
 19 A. Roughly the same time, in the  
 20 middle of the '90s sometime, mid '90s.  
 21 Q. Not in the years 2000 to 2002?  
 22 A. Mid '90s.  
 23 Q. Have you ever communicated with any  
 24 representative of [REDACTED]  
 25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential  
 2 form and foundation.  
 3 A. I mean I've been to his -- in the  
 4 mid '90s, I would have communicated with  
 5 people who worked for him.  
 6 Q. Have you communicated with [REDACTED]  
 7 [REDACTED] about this case?  
 8 A. No.  
 9 Q. Have you ever seen a topless female  
 10 at any one of Jeffrey Epstein's properties?  
 11 MR. PAGLIUCA: Objection to the  
 12 form and foundation. You've asked this  
 13 question, by the way, earlier on today.  
 14 A. Again, I testified that there are  
 15 people who from time to time in the privacy  
 16 of a swimming pool have maybe taken a bikini  
 17 top off or something but it's not common and  
 18 certainly when I was at the house I don't  
 19 really recollect seeing that kind of  
 20 activity.  
 21 Q. Have you ever smoked cigarettes?  
 22 A. Yes.  
 23 Q. Have you ever smoked cigarettes  
 24 with Virginia Roberts?  
 25 A. I don't recall smoking cigarettes

1 G Maxwell - Confidential  
 2 with Virginia Roberts.  
 3 Q. I'm marking this as Maxwell 25.  
 4 (Maxwell Exhibit 25, email, marked  
 5 for identification.)  
 6 Q. I'm showing you what has been  
 7 marked as Maxwell 25.  
 8 This is an email dated January 11,  
 9 2015 at the top?  
 10 Do you see that that from Jeffrey  
 11 to you?  
 12 A. Uh-huh.  
 13 Q. And then below there is an email  
 14 from [REDACTED] to you and cc'ing [REDACTED]  
 15 on January 11, 2015.  
 16 Do you see that?  
 17 A. Uh-huh.  
 18 Q. It says, Dear Ghislaine, as you  
 19 know I have been working behind the scenes  
 20 and this article comes from that. It helps  
 21 but doesn't answer the VR claims. I will get  
 22 the criminal allegations out. This shows the  
 23 MOS will print truth, not just a VR voice  
 24 piece. We can only make the truth by making  
 25 a statement.

<p style="text-align: right;">Page 406</p> <p>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           [REDACTED] 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.</p>	<p style="text-align: right;">Page 408</p> <p>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.</p>
<p style="text-align: right;">Page 407</p> <p>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 [REDACTED] 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 [REDACTED]  15           [REDACTED]  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?</p>	<p style="text-align: right;">Page 409</p> <p>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>

Page 410

1 G Maxwell - Confidential  
 2 Q. Were there other flights that you  
 3 recall flying on with Jeffrey Epstein that  
 4 were on flights that -- where [REDACTED] was  
 5 not the pilot?

6 A. [REDACTED] was not always the  
 7 pilot.

8 Q. How many planes did Jeffrey Epstein  
 9 have during the time you were with him?

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

12 A. So you need to give me a date  
 13 range.

14 Q. During the time period of 1992  
 15 through when you left your employment which I  
 16 think you said was in 2009?

17 A. So in the '90s he had one plane and  
 18 at some point in the 2000s he had two planes  
 19 but I can't testify to anything past 2002,  
 20 2003, what happened to his planes after that.

21 Q. Do you know what travel agency, if  
 22 any, Jeffrey would use when he would send  
 23 someone, for example, you or one of his other  
 24 employees on a flight somewhere? Did he use  
 25 a particular travel agency to make those

Page 412

1 G Maxwell - Confidential  
 2 there in the course of the work you were  
 3 doing for Jeffrey?

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

6 A. I was never sent. I had a job to  
 7 do and I would have to go to New Mexico for  
 8 work.

9 Q. Would [REDACTED] assist in that  
 10 project?

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

13 A. No. The project was largely  
 14 complete, largely complete by the end -- I  
 15 don't remember the dates exactly but it was  
 16 largely complete by the 1990s, 2000s.

17 Q. Do you know why [REDACTED] would  
 18 be going to New Mexico to meet you?

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

21 A. I don't know. She worked for  
 22 Jeffrey.

23 MR. PAGLIUCA: I think we are out  
 24 of time, counsel.

25 THE VIDEOGRAPHER: It's true.

Page 411

Page 413

1 G Maxwell - Confidential  
 2 arrangements?

3 A. I don't recall.

4 Q. Were you ever responsible for  
 5 making those arrangements for other  
 6 individuals?

7 A. I don't recall making flight  
 8 arrangements.

9 Q. Was it a New York travel agent that  
 10 you would use for those arrangements?

11 A. Again, we are talking 16, 17, 18  
 12 years. I just don't recall anything to do  
 13 with travel agents.

14 Q. Would Jeffrey Epstein ever fly, for  
 15 example, [REDACTED] on a commercial flight  
 16 to meet you in New Mexico?

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

19 A. I can't testify to that.

20 Q. Do you recall a trip where you met  
 21 [REDACTED] in New Mexico?

22 A. No, I don't recall any specific  
 23 trip, no.

24 Q. Why would you be sent to New  
 25 Mexico, is there a reason why you would go

1 G Maxwell - Confidential

2 MS. McCAWLEY: I will state for the  
 3 record there were questions today that  
 4 remain unanswered because the witness  
 5 has been instructed not to answer those  
 6 questions and we will be raising our  
 7 objections with the court to be able to  
 8 have those questions answered in the  
 9 near future.

10 MR. PAGLIUCA: So we are clear, we  
 11 are designating this entire deposition  
 12 as confidential under the protective  
 13 order. That would cover the paralegal  
 14 whose been present as well as the court  
 15 reporter and the videographer and all  
 16 the lawyers in the room.

17 THE VIDEOGRAPHER: This concludes  
 18 today's proceedings. We are off the  
 19 record at 6:43 p.m.

20 (Time noted: 6:43 p.m.)

		Page 414		Page 416
1			1	
2	---		2	CERTIFICATE
3	I N D E X		3	
4	---		4	
5			5	I HEREBY CERTIFY that the witness,
6	GHISLAINE MAXWELL	PAGE	6	GHISLAINE MAXWELL, was duly sworn by me and
7	By Ms. McCawley	4	7	that the deposition is a true record of the
8			8	testimony given by the witness.
9	---		9	
10	E X H I B I T S		10	<i>Leslie Fagin</i>
11	---		11	Leslie Fagin, Registered Professional Reporter
12	MAXWELL EXHIBIT	PAGE	12	Dated: April 22, 2016
13	Exhibit 1 police report	24	13	
14	Exhibit 2 email	33	14	
15	Exhibit 3 transcript	71	15	(The foregoing certification of
16	Exhibit 4 photo	109	16	this transcript does not apply to any
17	Exhibit 5 photo	113	17	reproduction of the same by any means, unless
18	Exhibit 6 flight logs	117	18	under the direct control and/or supervision
19	Exhibit 7 photo	133	19	of the certifying reporter.)
20	Exhibit 8 photo	143	20	
21	Exhibit 9 message pad pages	147	21	
22	Exhibit 10 email	209	22	
23	Exhibit 11 photo	259	23	
24	Exhibit 12 documents	263	24	
25	Exhibit 13 documents	312	25	
		Page 415		Page 417
1			1	
2	MAXWELL EXHIBIT	PAGE	2	ACKNOWLEDGMENT OF DEPONENT
3	Exhibit 14 email	345	3	
4	Exhibit 15 email	348	4	I, , do hereby
5	Exhibit 16 email	348	5	certify that I have read the foregoing pages,
6	Exhibit 17 email	361	6	and that the same is a correct transcription
7	Exhibit 18 email	363	7	of the answers given by me to the questions
8	Exhibit 19 email	365	8	therein propounded, except for the
9	Exhibit 20 email	367	9	corrections or changes in form or substance,
10	Exhibit 21 email	384	10	if any, noted in the attached Errata Sheet.
11	Exhibit 22 email	390	11	
12	Exhibit 23 email	392	12	GHISLAINE MAXWELL DATE
13	Exhibit 24 email	398	13	
14	Exhibit 25 email	405	14	Subscribed and sworn
15			15	to before me this
16			16	day of , 2016.
17			17	My commission expires:
18			18	
19			19	
20			20	
21			21	
22			22	
23			23	
24			24	
25			25	