

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

CONFIDENTIAL

Videotaped deposition of GHISLAINE
MAXWELL, taken pursuant to subpoena, was
held at the law offices of BOIES
SCHILLER & FLEXNER, 575 Lexington
Avenue, New York, New York, commencing
April 22, 2016, 9:04 a.m., on the above
date, before Leslie Fagin, a Court
Reporter and Notary Public in the State
of New York.

- - -

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

Page 2

1
2 APPEARANCES:
3
4 BOIES SCHILLER & FLEXNER, LLP
Attorneys for Plaintiff
401 East Las Olas Boulevard
5 Fort Lauderdale, Florida, 33301
6 BY: SIGRID McCAWLEY, ESQUIRE
MEREDITH SCHULTZ, ESQUIRE
EMMA ROSEN, PARALEGAL
7
8 FARMER JAFFE WEISSING EDWARDS FISTOS &
9 LEHRMAN, P.L.
Attorneys for Plaintiff
10 425 N. Andrews Avenue
Fort Lauderdale, Florida 33301
11 BY: BRAD EDWARDS, ESQUIRE
12
13 PAUL G. CASSELL, ESQUIRE
Attorneys for Plaintiff
14 383 South University Street
Salt Lake City, Utah 84112
15
16 HADDON MORGAN FOREMAN
Attorneys for Defendant
17 150 East 10th Avenue
Denver, Colorado 80203
18 BY: JEFFREY S. PAGLIUCA, ESQUIRE
LAURA A. MENNINGER, ESQUIRE
19
20 Also Present:
21 James Christe, videographer
22
23
24
25

Page 3

1
2 THE VIDEOGRAPHER: We are now on
3 the record and recording. This begins
4 disk No. 1 in the deposition of
5 Ghislaine Maxwell in the matter of
6 Virginia Giuffre versus Ghislaine
7 Maxwell in the U.S. District Court for
8 the Southern District of New York.
9 Today is April 22, 2016 the time is
10 9:04 a.m.. This deposition is being
11 taken at 575 Lexington Avenue in New
12 York at the request of Sigrid McCawley
13 of Boies Schiller & Flexner.
14 The videographer is James Christe
15 and the court reporter is Leslie Fagin.
16 Will counsel state their appearance and
17 whom they represent and then court
18 reporter swear in Ms. Maxwell.
19 MS. McCAWLEY: My name is Sigrid
20 McCawley with my colleague Meredith
21 Schultz. We are with Boies Schiller &
22 Flexner. We represent Ms. Giuffre.
23 MR. EDWARDS: Brad Edwards. I also
24 represent Ms. Giuffre.
25 MR. CASSELL: Paul Cassell, I also

Page 4

1 G Maxwell - Confidential
2 represent Ms. Giuffre.
3 MR. PAGLIUCA: Jeff Pagliuca and
4 Laura Menninger on behalf of Ms.
5 Maxwell.
6 GHISLAINE MAXWELL, called
7 as a witness, having been duly sworn by a
8 Notary Public, was examined and testified as
9 follows:
10 EXAMINATION BY
11 MS. McCAWLEY:
12 Q. Good morning. I'm going to explain
13 some of the rules that will happen with
14 respect to depositions.
15 Have you ever been deposed before?
16 A. I have not.
17 Q. What is going to happen here, we
18 have a court reporter and a videographer.
19 What they do is take down the words that we
20 say so when I ask you a question they will
21 record what you say in response to that. So
22 we have to be mindful that in order for them
23 to do their job we can't talk over each
24 other.
25 Another issue you have to be weary

Page 5

1 G Maxwell - Confidential
2 of is that in a response, you can't give a
3 nonverbal response, in other words, nodding a
4 yes or no, they need to hear verbal response
5 so they can record it on their transcript.
6 So that's important for you to remember as we
7 go through the day. If you forget, I will be
8 sure to remind you.
9 Is there anything that would
10 prevent you from giving truthful testimony
11 today?
12 A. There is not.
13 Q. You are not on any medications or
14 anything that would inhibit your ability to
15 remember or give truthful testimony?
16 A. I am not.
17 MR. PAGLIUCA: Could you identify
18 the assistant in the room.
19 MS. McCAWLEY: This is Emma Rosen
20 from our New York office. She is a
21 paralegal.
22 Q. Ms. Maxwell, can you please state
23 your address for the record?
24 A. Currently [REDACTED].
25 Q. What is your date of birth?

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

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

Page 14

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

Page 15

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.

Page 16

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?

Page 17

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

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

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

Page 26

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

Page 27

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.

Page 28

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

Page 29

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

<p style="text-align: right;">Page 34</p> <p>1 G Maxwell - Confidential</p> <p>2 for identification.)</p> <p>3 Q. So I'm showing you a document that</p> <p>4 we have marked as Maxwell Exhibit 2. It's a</p> <p>5 document you produced in this matter labeled</p> <p>6 confidential GM 00109. It's dated Sunday</p> <p>7 June 12, 2011. It's from Jeffrey Epstein to</p> <p>8 you. If you can turn to page 4 -- sorry, can</p> <p>9 you turn to the first page, the cover page</p> <p>10 initially which is 00109. If you look under</p> <p>11 the time stamp it says, June 12, 2011 at 4:12</p> <p>12 p.m., it says [REDACTED]</p> <p>13 Is that your email address?</p> <p>14 A. It is.</p> <p>15 Q. Under that it says, Thank you. I</p> <p>16 have it now and I'm working on a letter, a</p> <p>17 little, I will send the final version</p> <p>18 tomorrow and what ever it is will be</p> <p>19 factually accurate.</p> <p>20 Do you see that on page 1?</p> <p>21 A. I do.</p> <p>22 Q. Then I would like you to turn to</p> <p>23 page 4 please. The second paragraph down on</p> <p>24 page 4, it states, After some thought, I</p> <p>25 recall that I first met Ms. Roberts when she</p>	<p style="text-align: right;">Page 36</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Are you questioning that this</p> <p>3 document is incorrect, this document -- this</p> <p>4 email that you wrote?</p> <p>5 A. I wrote an email. I was trying to</p> <p>6 be accurate, so who knows, with all the</p> <p>7 rubbish that you guys have put out in the</p> <p>8 press that I read, maybe in the moment I</p> <p>9 wrote it a memory came to me that I don't</p> <p>10 know, but as I sit here today and the</p> <p>11 testimony I gave you today is I don't</p> <p>12 recollect it.</p> <p>13 Q. Does this refresh your recollection</p> <p>14 that you recalled meeting Ms. Roberts at</p> <p>15 Mar-a-Lago?</p> <p>16 A. It does not.</p> <p>17 Q. So your testimony today is that you</p> <p>18 don't remember meeting Ms. Roberts at</p> <p>19 Mar-a-Lago?</p> <p>20 A. I do not.</p> <p>21 I just want to clarify, when you</p> <p>22 read so much stuff and so much rubbish that</p> <p>23 comes out from Virginia Roberts, you don't</p> <p>24 know what's up and down, at the time I wrote</p> <p>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</p> <p>2 was working at a premier resort claiming to</p> <p>3 be 18 years old and a professional masseuse?</p> <p>4 MR. PAGLIUCA: What line are you</p> <p>5 on, counsel.</p> <p>6 MS. McCAWLEY: Second paragraph</p> <p>7 down.</p> <p>8 MR. PAGLIUCA: I got it.</p> <p>9 Q. Is that a statement that you wrote?</p> <p>10 A. It appears to be.</p> <p>11 Q. So does that correct your testimony</p> <p>12 that you did meet Ms. Roberts at Mar-a-Lago?</p> <p>13 A. Again, this was written in, when</p> <p>14 were you saying?</p> <p>15 Q. 2011.</p> <p>16 A. So by 2011, Ms. Roberts had already</p> <p>17 perpetrated so many lies and stories it's</p> <p>18 hard for me to accurately tell you today what</p> <p>19 I remember back then. As I sit here today,</p> <p>20 the testimony I give you today, I do not</p> <p>21 recollect it.</p> <p>22 Q. Do you have a reason to say that</p> <p>23 this document that you wrote is incorrect?</p> <p>24 A. It's in 2011, I can't possibly tell</p> <p>25 you what I remember in 2011.</p>	<p style="text-align: right;">Page 37</p> <p>1 G Maxwell - Confidential</p> <p>2 here today I do not.</p> <p>3 Q. Ms. Maxwell, when did you first</p> <p>4 meet [REDACTED]</p> <p>5 MR. PAGLIUCA: Object to the form</p> <p>6 and foundation.</p> <p>7 A. I have no idea when I met her.</p> <p>8 Q. Do you know how old she was when</p> <p>9 you met her?</p> <p>10 A. I have no idea how old she was when</p> <p>11 I met her.</p> <p>12 Q. Is it possible she was 13 years old</p> <p>13 when you first met her?</p> <p>14 MR. PAGLIUCA: Object to the form</p> <p>15 and foundation.</p> <p>16 A. [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 may have been in the house when Jeffrey was</p> <p>19 in the house. I have no idea how old she</p> <p>20 was.</p> <p>21 Q. I understand [REDACTED]</p> <p>22 [REDACTED].</p> <p>23 I'm asking if [REDACTED] was 13</p> <p>24 years old when you first met her?</p> <p>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 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 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 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?

Page 42

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?

Page 43

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

Page 44

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

Page 45

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?

Page 46

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.

Page 47

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

Page 48

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]

Page 49

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</p> <p>2 A. People had salaries and they were</p> <p>3 paid by the office.</p> <p>4 Q. Did you ever pay any individual,</p> <p>5 did you ever hand an individual cash for work</p> <p>6 they performed?</p> <p>7 MR. PAGLIUCA: Object to the form.</p> <p>8 A. Can you be more specific about what</p> <p>9 you are asking me.</p> <p>10 Q. Did you ever hand any individual</p> <p>11 who was working at the home cash as payment</p> <p>12 for something that they performed at the</p> <p>13 home?</p> <p>14 MR. PAGLIUCA: Object to the form.</p> <p>15 A. To the best of my recollection</p> <p>16 there were very few times where I would leave</p> <p>17 some cash for people for work performed.</p> <p>18 Q. And what type of work was being</p> <p>19 performed where you would be doing that?</p> <p>20 A. If I left cash for the pool guy, I</p> <p>21 would have left potentially some cash for the</p> <p>22 gardener, potentially for exercise</p> <p>23 instructors and sometimes for massage</p> <p>24 therapy.</p> <p>25 Q. How much were the massage</p>	<p style="text-align: right;">Page 52</p> <p>1 G Maxwell - Confidential</p> <p>2 for sexual acts.</p> <p>3 Q. I'm asking if they performed sexual</p> <p>4 acts?</p> <p>5 MR. PAGLIUCA: Object to the form</p> <p>6 and foundation.</p> <p>7 Q. Did any of the massage therapists</p> <p>8 who were at the home perform sexual acts for</p> <p>9 Jeffrey Epstein?</p> <p>10 A. I don't know what you mean by</p> <p>11 sexual acts.</p> <p>12 Q. Did any of the massage therapists</p> <p>13 who were working at the home perform sexual</p> <p>14 acts, including touching the breasts,</p> <p>15 touching the vaginal area, being touched</p> <p>16 while Jeffrey is masturbating, having</p> <p>17 intercourse, any of those things?</p> <p>18 MR. PAGLIUCA: Objection. Form and</p> <p>19 foundation.</p> <p>20 To the extent any of this is asking</p> <p>21 for to your knowledge any consensual sex</p> <p>22 act that may or may not have involved</p> <p>23 you, I'm instructing you not to answer</p> <p>24 the question.</p> <p>25 Q. I'm not asking about consensual sex</p>
<p style="text-align: right;">Page 51</p> <p>1 G Maxwell - Confidential</p> <p>2 therapists paid?</p> <p>3 MR. PAGLIUCA: Object to the form</p> <p>4 and foundation.</p> <p>5 A. They get paid between 100 and \$200.</p> <p>6 Q. Did it vary based on what sexual</p> <p>7 acts they performed?</p> <p>8 MR. PAGLIUCA: Object to the form</p> <p>9 and foundation.</p> <p>10 A. No. It varied depending how much</p> <p>11 time, some massage therapists charge more and</p> <p>12 some charge less.</p> <p>13 Q. Did the massage therapists that</p> <p>14 were hired to come to the home perform sexual</p> <p>15 acts for Jeffrey Epstein?</p> <p>16 MR. PAGLIUCA: Object to the form</p> <p>17 and foundation.</p> <p>18 A. What are you asking me?</p> <p>19 Q. I'm asking if the massage</p> <p>20 therapists --</p> <p>21 A. Are you asking me about underage</p> <p>22 girls?</p> <p>23 Q. I'm asking in general, did any of</p> <p>24 the massage therapists in the home --</p> <p>25 A. Are you asking if they were paid</p>	<p style="text-align: right;">Page 53</p> <p>1 G Maxwell - Confidential</p> <p>2 acts. I'm asking whether any of the massage</p> <p>3 therapists performed sexual acts for Mr.</p> <p>4 Epstein, as I have just described?</p> <p>5 A. I have never seen anybody have</p> <p>6 sexual intercourse with with Jeffrey, ever.</p> <p>7 Q. I'm not asking about sexual</p> <p>8 intercourse. I'm asking about any sexual</p> <p>9 act, touching of the breast -- did you ever</p> <p>10 see -- can you read back the question?</p> <p>11 (Record read.)</p> <p>12 A. I'm not addressing any questions</p> <p>13 about consensual adult sex. If you want to</p> <p>14 talk about what the subject matter, which is</p> <p>15 defamation and lying, Virginia Roberts, that</p> <p>16 you and Virginia Roberts are participating in</p> <p>17 perpetrating her lies, I'm happy to address</p> <p>18 those. I never saw any inappropriate</p> <p>19 underage activities with Jeffrey ever.</p> <p>20 Q. I'm not asking about underage. I'm</p> <p>21 asking about whether any of the masseuses</p> <p>22 that were at the home perform sexual acts for</p> <p>23 Jeffrey Epstein?</p> <p>24 A. I have just answered the question.</p> <p>25 Q. No, you haven't.</p>

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

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

Page 62

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.

Page 63

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.

Page 64

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 you know what the
25 instruction is. If there is any

Page 65

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.

Page 66

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

Page 67

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

Page 68

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

Page 69

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

<p style="text-align: right;">Page 70</p> <p>1 G Maxwell - Confidential</p> <p>2 that you kept in the Palm Beach house?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 A. First of all what do you mean.</p> <p>6 Q. A laundry basket that contained sex</p> <p>7 toys in it?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. Can you ask the question again?</p> <p>11 Q. Did you have a laundry basket that</p> <p>12 contained sex toys in it, in the Palm Beach</p> <p>13 House?</p> <p>14 MR. PAGLIUCA: Objection to the</p> <p>15 form and foundation.</p> <p>16 Q. Did you have a laundry basket of</p> <p>17 sex toys in the Palm Beach house?</p> <p>18 MR. PAGLIUCA: Same objection.</p> <p>19 Q. You can answer.</p> <p>20 A. I don't recollect anything about a</p> <p>21 laundry basket of sex toys.</p> <p>22 Q. Do you recollect having sex toys at</p> <p>23 the Palm Beach house?</p> <p>24 A. You have to define what are you</p> <p>25 talking about.</p>	<p style="text-align: right;">Page 72</p> <p>1 G Maxwell - Confidential</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p style="text-align: right;">Page 71</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. A sex toy meaning a vibrator of</p> <p>3 some kind, sometimes they are called dildos,</p> <p>4 of that nature, anything like that?</p> <p>5 A. I don't recollect anything that</p> <p>6 would formally be a dildo, anything like</p> <p>7 that.</p> <p>8 Q. How would you describe sex toys?</p> <p>9 A. I wouldn't describe sex toys.</p> <p>10 Q. Did you have anything that was of</p> <p>11 an electronic nature that would be used</p> <p>12 during sex?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. I have no idea what you are</p> <p>16 referring to.</p> <p>17 (Maxwell Exhibit 3, transcript,</p> <p>18 marked for identification.)</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 73</p> <p>1 G Maxwell - Confidential</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

Page 74

1 G Maxwell - Confidential

2

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.

Page 75

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

Page 76

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 is a cell phone as part
25 of her masseuse obligations?

Page 77

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

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

Page 86

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

Page 87

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 --

Page 88

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

Page 89

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

Page 94

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

Page 95

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

Page 96

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.

Page 97

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

Page 98

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.

Page 99

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 not 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

Page 100

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.

Page 101

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

Page 106

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?

Page 107

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 the 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

Page 108

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.

Page 109

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?

Page 110

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

Page 111

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]
[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]

Page 112

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]

Page 113

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

Page 114

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,

Page 115

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.

Page 116

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

Page 117

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.

Page 118

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

Page 119

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.

Page 120

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 [REDACTED]
 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

Page 121

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

Page 122

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?

Page 123

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

Page 124

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

Page 125

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

Page 126

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

Page 127

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

Page 128

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

Page 129

1 G Maxwell - Confidential
 2 form and foundation.
 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.
 8 Q. I would like you to turn to page,
 9 at the bottom, the Bates number is [REDACTED].
 10 And the month is [REDACTED].
 11 A. Okay.
 12 Q. If you go down to the number that
 13 is [REDACTED], that would be [REDACTED], you're
 14 going to see on that line an [REDACTED] which is a
 15 [REDACTED] and then you
 16 will see [REDACTED] which is going to be, I'm going
 17 to pronounce it incorrectly, [REDACTED],
 18 [REDACTED], I'm sure I'm not pronouncing that
 19 correctly. Then you will see in the list,
 20 you will see JE, GM, [REDACTED],
 21 [REDACTED], it looks like --
 22 A. I believe it says male.
 23 Q. Yes. Then [REDACTED] I
 24 believe. Is that GM on this page
 25 representative of you?

Page 130

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.

Page 131

1 G Maxwell - Confidential
 2 A. Uh-huh.
 3 Q. Do you recall flying with [REDACTED]
 4 from [REDACTED] to [REDACTED]
 5 [REDACTED].
 6 A. I do.
 7 Q. So the GM that would be represented
 8 in that column would be you?
 9 A. I recall going to [REDACTED] with [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]

Page 132

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.

Page 133

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

Page 134

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

Page 135

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

Page 136

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

Page 137

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

Page 138

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

Page 139

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

Page 140

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

Page 141

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]

Page 142

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.

Page 143

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

Page 144

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]

Page 145

1 G Maxwell - Confidential
2 and in the line, the remarks line you will
3 see JE, GM, [REDACTED]
[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]
[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

Page 146

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

Page 147

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

Page 148

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

Page 149

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.

Page 150

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.

Page 151

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

Page 152

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?

Page 153

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]

Page 154

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

Page 155

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.

Page 156

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.

Page 157

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]

Page 158

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

Page 159

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

Page 160

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.

Page 161

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

Page 162

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.

Page 163

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

Page 164

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

Page 165

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.

Page 166

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

Page 167

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

Page 168

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

Page 169

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 style="text-align: right;">Page 170</p> <p>1 G Maxwell - Confidential</p> <p>2 talking about, the document and the</p> <p>3 investigation, you said you are aware of and</p> <p>4 after having talked to Jeffrey Epstein, do</p> <p>5 you believe Jeffrey Epstein sexually abused</p> <p>6 minors?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. What do you mean I talked to</p> <p>10 Jeffrey, you need to break the question down</p> <p>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</p> <p>15 investigation?</p> <p>16 A. I am.</p> <p>17 Q. Let's take those two things. After</p> <p>18 knowing those two things, do you believe that</p> <p>19 Jeffrey Epstein abused minor children?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. Can you explain what you mean by</p> <p>23 the question actually.</p> <p>24 Q. I think the question speaks for</p> <p>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</p> <p>2 sentenced for sexual abuse, are you aware of</p> <p>3 that?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 Q. Are you aware that Jeffrey Epstein</p> <p>7 served time for sexual abuse of a minor?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 A. I don't believe that's what he was</p> <p>11 sentenced for, actually.</p> <p>12 Q. So you don't know that Jeffrey</p> <p>13 Epstein served time for sexually abusing a</p> <p>14 minor?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. I don't believe that's what he was</p> <p>18 sentenced for.</p> <p>19 Q. Do you know that Jeffrey Epstein</p> <p>20 was convicted for procuring a minor for</p> <p>21 prostitution?</p> <p>22 MR. PAGLIUCA: Objection to the</p> <p>23 form and foundation.</p> <p>24 A. I don't know exactly what he was</p> <p>25 convicted of. I don't know that he was</p>
<p style="text-align: right;">Page 171</p> <p>1 G Maxwell - Confidential</p> <p>2 more time because I want you to be able to</p> <p>3 understand it.</p> <p>4 Knowing that you have the police</p> <p>5 report here and knowing about the criminal</p> <p>6 investigation, do you believe that Jeffrey</p> <p>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</p> <p>10 and I know what I read.</p> <p>11 Q. I'm asking what you believe, do you</p> <p>12 believe Jeffrey Epstein sexually abused</p> <p>13 minors?</p> <p>14 A. I can only tell you what I read and</p> <p>15 what you showed me.</p> <p>16 Q. I'm asking what you believe, from</p> <p>17 your own belief, do you believe that Jeffrey</p> <p>18 Epstein abused minors?</p> <p>19 A. I can only go from what I know</p> <p>20 personally and what I know personally about</p> <p>21 what Virginia's lies talked about. She is</p> <p>22 the only person I know that actually claimed</p> <p>23 that. And I can say with certitude that</p> <p>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</p> <p>2 convicted. I know he spent time in jail.</p> <p>3 Q. Do you know that he spent time in</p> <p>4 jail related to an issue with a minor child?</p> <p>5 MR. PAGLIUCA: Objection to the</p> <p>6 form and foundation.</p> <p>7 A. I did not know that.</p> <p>8 Q. What did you think he was spending</p> <p>9 time in jail for?</p> <p>10 A. I only know he went to jail for --</p> <p>11 it was alleged that he hired -- had an</p> <p>12 underage prostitute.</p> <p>13 Q. So knowing that, do you believe</p> <p>14 that Jeffrey Epstein sexually abused minors?</p> <p>15 MR. PAGLIUCA: Objection to the</p> <p>16 form and foundation.</p> <p>17 A. I can only tell you what he went to</p> <p>18 jail for.</p> <p>19 Q. I'm asking what you believe. I'm</p> <p>20 not asking what he went to jail for. I'm</p> <p>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</p> <p>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</p> <p>2 believe. Do you believe --</p> <p>3 A. I can only testify --</p> <p>4 Q. Let me finish the question so the</p> <p>5 record is clear.</p> <p>6 Do you believe Jeffrey Epstein</p> <p>7 sexually abused minors?</p> <p>8 MR. PAGLIUCA: Objection to the</p> <p>9 form and foundation.</p> <p>10 Q. You can answer.</p> <p>11 A. I can only testify to what I know.</p> <p>12 I know that Virginia is a liar and I know</p> <p>13 what she testified is a lie. So I can only</p> <p>14 testify to what I know to be a falsehood and</p> <p>15 half those falsehoods are enormous and so I</p> <p>16 can only categorically deny everything she</p> <p>17 has said and that is the only thing I can</p> <p>18 talk about because I have no knowledge of</p> <p>19 anything else.</p> <p>20 Q. I'm not asking about Virginia. I'm</p> <p>21 asking whether you believe that Jeffrey</p> <p>22 Epstein sexually abused minors?</p> <p>23 A. Again, I repeat, I can only go on</p> <p>24 what I know and what I know is a falsehood</p> <p>25 based on what Virginia said.</p>	<p style="text-align: right;">Page 176</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Do you believe Jeffrey Epstein</p> <p>3 sexually abused minors?</p> <p>4 A. Again, I repeat, the only person I</p> <p>5 know who has talked about these things that I</p> <p>6 have personal -- was personally present, was</p> <p>7 Virginia and I can only talk to Virginia and</p> <p>8 she is a liar.</p> <p>9 Q. Setting aside Virginia. Take her</p> <p>10 out of the picture. It's my question.</p> <p>11 A. We are here today because of</p> <p>12 Virginia and her lies because this is a</p> <p>13 defamation suit.</p> <p>14 Q. Setting aside Virginia, do you</p> <p>15 believe Jeffrey Epstein sexually abused</p> <p>16 minors?</p> <p>17 A. I cannot set aside Virginia because</p> <p>18 that's why we are here and this is the only</p> <p>19 reason I am sitting here in this room and I</p> <p>20 will not set her aside and I cannot comment</p> <p>21 about anything else except her because she is</p> <p>22 the only person I actually know about.</p> <p>23 Q. Are you refusing to answer that</p> <p>24 question?</p> <p>25 A. I am not refusing the question. I</p>
<p style="text-align: right;">Page 175</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Do you believe Jeffrey Epstein</p> <p>3 sexually abused minors?</p> <p>4 A. Again, I repeat, Virginia is a liar</p> <p>5 and based on Virginia's stories, that is</p> <p>6 what -- she lied and I can only then talk</p> <p>7 about what you've showed me in the police</p> <p>8 reports and I know he went to jail.</p> <p>9 Q. Do you believe that Jeffrey Epstein</p> <p>10 sexually abused minors? I'm asking about</p> <p>11 your belief.</p> <p>12 A. Again, I just repeat, I can only</p> <p>13 go -- my belief is Virginia is a liar.</p> <p>14 Q. What is that belief?</p> <p>15 A. She is an absolute liar and</p> <p>16 everything she said is a lie and therefore,</p> <p>17 everything that stems from that is a lie.</p> <p>18 Q. So do you believe that Jeffrey</p> <p>19 Epstein sexually abused minors?</p> <p>20 A. Again -- can we move on from here?</p> <p>21 Q. No. You are going to answer the</p> <p>22 question.</p> <p>23 A. I have already.</p> <p>24 Q. No, you haven't.</p> <p>25 A. I have.</p>	<p style="text-align: right;">Page 177</p> <p>1 G Maxwell - Confidential</p> <p>2 can only testify about Virginia who is an</p> <p>3 absolute total liar and you all know she is.</p> <p>4 She lied about her age, you know she lied</p> <p>5 about absolutely everything. So I can only</p> <p>6 go on what I know as a liar and she is a</p> <p>7 liar, an exaggerator, a fantasist and</p> <p>8 absolutely true terrible person.</p> <p>9 Q. I want you to listen very</p> <p>10 carefully. I am asking you to set aside</p> <p>11 Virginia.</p> <p>12 A. I can't set aside Virginia.</p> <p>13 Q. I am asking you to do that for</p> <p>14 purposes of this question.</p> <p>15 MR. PAGLIUCA: She doesn't have to.</p> <p>16 MS. McCAWLEY: She can refuse to</p> <p>17 answer the question.</p> <p>18 A. I'm not refusing to answer the</p> <p>19 question.</p> <p>20 Q. You are refusing.</p> <p>21 My question has nothing to do with</p> <p>22 Virginia. Let me make the record here. My</p> <p>23 question has nothing to do with Virginia. I</p> <p>24 want it to be clear for the court. My</p> <p>25 question has nothing to do with Virginia.</p>

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

Page 182

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

Page 183

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

Page 184

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

Page 185

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

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

<p style="text-align: right;">Page 190</p> <p>1 G Maxwell - Confidential</p> <p>2 or around the home?</p> <p>3 A. I think we need to distinguish</p> <p>4 between anyone under the age of 18 and over</p> <p>5 the age of 18.</p> <p>6 Q. We will start with, did you take</p> <p>7 pictures of nude females in or around any of</p> <p>8 Jeffrey's homes of women or females that were</p> <p>9 under the age of 18?</p> <p>10 A. No.</p> <p>11 Q. Did you take pictures of nude</p> <p>12 females --</p> <p>13 A. Nude you mean with no clothing on.</p> <p>14 Q. Or half nude, with no top on, any</p> <p>15 sort of nakedness to an individual.</p> <p>16 In any of Jeffrey's homes, either</p> <p>17 Palm Beach, New Mexico, USVI or New York</p> <p>18 either outside by the pool, anywhere in or</p> <p>19 around those homes of females over the age of</p> <p>20 18?</p> <p>21 A. So it is possible that I took</p> <p>22 pictures of people that were somehow semi or</p> <p>23 had some clothing on or no clothes on but at</p> <p>24 no time were any of these pictures remotely</p> <p>25 inappropriate. They were, you could see them</p>	<p style="text-align: right;">Page 192</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Not as a gift.</p> <p>3 Do you recall ever giving Jeffrey</p> <p>4 Epstein pictures that you've taken of these</p> <p>5 individuals in a naked state?</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation.</p> <p>8 A. First of all, we've already</p> <p>9 established that they are not naked state</p> <p>10 photographs.</p> <p>11 Q. A piece of them being naked as you</p> <p>12 described.</p> <p>13 A. I said they would be attractive as</p> <p>14 you would see in mainstream magazines and</p> <p>15 those pictures could be a picture of a hand</p> <p>16 or a foot, they didn't necessarily</p> <p>17 constitute -- I know where you are headed</p> <p>18 with this and it's nowhere appropriate and</p> <p>19 it's really unattractive.</p> <p>20 Q. I'm not headed anywhere. I'm just</p> <p>21 asking the questions. Did you give Jeffrey</p> <p>22 Epstein any of these pictures that you took</p> <p>23 of females in the state that you described?</p> <p>24 A. I can't recall ever giving him</p> <p>25 pictures but it is possible that I took</p>
<p style="text-align: right;">Page 191</p> <p>1 G Maxwell - Confidential</p> <p>2 in a mainstream magazine today, there would</p> <p>3 be no inappropriateness, they would be</p> <p>4 covered, concealed, you wouldn't see anything</p> <p>5 at all.</p> <p>6 The types of -- first, I took very</p> <p>7 few and they were always by request, this was</p> <p>8 a picture you could put on your -- gift to</p> <p>9 your parent or to your grandparents to put on</p> <p>10 their mantel piece . It would be a very</p> <p>11 benign sort of attractive picture where you</p> <p>12 wouldn't see anything.</p> <p>13 Q. Who would request those pictures?</p> <p>14 A. From time to time, people, men and</p> <p>15 women would ask to have nice photographs of</p> <p>16 them taken.</p> <p>17 Q. And did Jeffrey Epstein request</p> <p>18 those pictures?</p> <p>19 A. I don't ever recall him asking me</p> <p>20 to take pictures.</p> <p>21 Q. Did you give him pictures of naked</p> <p>22 females as a present?</p> <p>23 A. I don't recall ever giving a</p> <p>24 present of -- I don't know why a photograph</p> <p>25 would constitute a gift.</p>	<p style="text-align: right;">Page 193</p> <p>1 G Maxwell - Confidential</p> <p>2 pictures of people that would end up -- or a</p> <p>3 friend of his that he would have -- not naked</p> <p>4 or not inappropriate in any way, that he</p> <p>5 might have somewhere in his house.</p> <p>6 Q. Name for me all the individuals who</p> <p>7 you took these pictures of?</p> <p>8 A. It's entirely impossible for me to</p> <p>9 name people. First of all, it was just -- it</p> <p>10 would not be possible, I took thousands of</p> <p>11 photos, not of people, I mostly take pictures</p> <p>12 of landscapes and things. I have no</p> <p>13 recollection specifically of people that I</p> <p>14 took pictures of.</p> <p>15 Q. So you can't remember, is it your</p> <p>16 testimony you can't remember one person that</p> <p>17 you took a picture of in either a naked or</p> <p>18 semi naked state?</p> <p>19 A. I seriously cannot recall. I just</p> <p>20 don't recall.</p> <p>21 Q. Did you take a picture of Virginia</p> <p>22 Roberts either alone or with another</p> <p>23 individual in a naked state?</p> <p>24 A. I have never taken, I believe, any</p> <p>25 pictures of two people in any type of</p>

<p style="text-align: right;">Page 194</p> <p>1 G Maxwell - Confidential</p> <p>2 situation, naked as you describe.</p> <p>3 Q. Did you take a picture of Virginia</p> <p>4 Roberts on her own without another individual</p> <p>5 in it in a naked state?</p> <p>6 A. I don't recall ever taking a</p> <p>7 picture of Virginia -- naked, we are not</p> <p>8 referring to someone with no clothing on at</p> <p>9 all, we are referring to someone that could</p> <p>10 be semi clad or could have a towel or we are</p> <p>11 not referring to anything inappropriate.</p> <p>12 Q. Was this a hobby of yours to take</p> <p>13 pictures of the type that you are describing?</p> <p>14 MR. PAGLIUCA: Object to the form.</p> <p>15 A. I just testified, I didn't take</p> <p>16 pictures of many people. My preference is</p> <p>17 pictures for landscapes and for architectural</p> <p>18 pieces.</p> <p>19 Q. Where are those pictures today?</p> <p>20 A. I have no idea.</p> <p>21 Q. Do you have them in your home?</p> <p>22 A. I do not.</p> <p>23 Q. Do you have them on your computer?</p> <p>24 A. I do not.</p> <p>25 Q. What has Jeffrey Epstein told you</p>	<p style="text-align: right;">Page 196</p> <p>1 G Maxwell - Confidential</p> <p>2 about those things.</p> <p>3 Q. What has Jeffrey Epstein told you</p> <p>4 about Virginia Roberts?</p> <p>5 A. That she is a liar.</p> <p>6 Q. What does he base that on?</p> <p>7 MR. PAGLIUCA: Objection to the</p> <p>8 form and foundation.</p> <p>9 A. You would have to check with him.</p> <p>10 I can tell you why I think she is a liar, I'm</p> <p>11 happy to do that.</p> <p>12 Q. Did he tell you he did not have</p> <p>13 sexual relations with Virginia Roberts?</p> <p>14 A. I can only testify what I know.</p> <p>15 Q. I'm asking, has he told you that he</p> <p>16 did not have sexual relations with Virginia</p> <p>17 Roberts?</p> <p>18 A. I can only tell you what I know</p> <p>19 about Virginia Roberts, I cannot tell you</p> <p>20 what he knows about Virginia Roberts.</p> <p>21 Q. I'm asking, did he tell you that he</p> <p>22 did not have sexual relations with Virginia</p> <p>23 Roberts?</p> <p>24 A. All he told me is she is a liar.</p> <p>25 Q. That's all he said about Virginia</p>
<p style="text-align: right;">Page 195</p> <p>1 G Maxwell - Confidential</p> <p>2 about the allegations related to the criminal</p> <p>3 investigation that he was involved in?</p> <p>4 A. I really can't say, not because I</p> <p>5 don't want to say but I just think of what he</p> <p>6 has said to me over the course of this time.</p> <p>7 Q. Did he explain it to you and</p> <p>8 explain what the charges were against him?</p> <p>9 A. I never had a detailed conversation</p> <p>10 with him, as I recall.</p> <p>11 Q. Not detailed, just did he explain</p> <p>12 anything that was happening to him?</p> <p>13 A. I haven't spoken to him for so</p> <p>14 long. I can't possibly testify to what</p> <p>15 conversations I had with him over the course</p> <p>16 of time.</p> <p>17 Q. Did he talk to you about any of the</p> <p>18 girls that were making allegations against</p> <p>19 him other than Virginia?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. You are talking about the police</p> <p>23 records again, all of that?</p> <p>24 Q. Yes.</p> <p>25 A. I have never had a conversation</p>	<p style="text-align: right;">Page 197</p> <p>1 G Maxwell - Confidential</p> <p>2 Roberts?</p> <p>3 A. We went through all the lies that</p> <p>4 you have sold to the papers and sold in</p> <p>5 general and we have analyzed her lies and</p> <p>6 your lies and your inappropriate behavior in</p> <p>7 detail.</p> <p>8 Q. Did he ever say that he did not</p> <p>9 have sexual relations with Virginia Roberts?</p> <p>10 A. I just testified that we went</p> <p>11 through all of her lies.</p> <p>12 Q. I understand what you said. I'm</p> <p>13 asking you a question.</p> <p>14 Did he ever tell you that he never</p> <p>15 had sex with Virginia Roberts?</p> <p>16 A. I don't recall whether he ever -- I</p> <p>17 don't know I ever had that question. We</p> <p>18 focused on the lies she did say she had with</p> <p>19 him as relates to me. I don't remember</p> <p>20 asking him about his problems with her. I'm</p> <p>21 interested in what she says about myself.</p> <p>22 Q. Did you also talk about what things</p> <p>23 that Virginia Roberts was saying that were</p> <p>24 true?</p> <p>25 A. There isn't anything that she said</p>

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

Page 202

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

Page 203

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]

Page 204

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

Page 205

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</p> <p>2 tell you, I can only talk about what I know</p> <p>3 to be true. What I know is her story about</p> <p>4 how she claims that initial situation</p> <p>5 happened is so egregiously false and such a</p> <p>6 giant fat enormous, repulsive, disgusting,</p> <p>7 inappropriate, vile lie, that that I can</p> <p>8 testify to.</p> <p>9 Q. Was she lying when she said she met</p> <p>10 you at Mar-a-Lago?</p> <p>11 A. Again I already testified I don't</p> <p>12 recall meeting her at Mar-a-Lago.</p> <p>13 Q. We showed you a document where you</p> <p>14 said you met her at Mar-a-Lago when she was</p> <p>15 17, is that correct?</p> <p>16 MR. PAGLIUCA: Objection to the</p> <p>17 form and foundation.</p> <p>18 A. I think I already testified to</p> <p>19 that. What I remembered based on all the</p> <p>20 rubbish she has written and all the many</p> <p>21 articles I have read, maybe in the moment</p> <p>22 when I wrote that, have caused me to have</p> <p>23 that but on reflection I don't recall it as I</p> <p>24 sit here today.</p> <p>25 Q. Are you saying that it was an</p>	<p style="text-align: right;">Page 208</p> <p>1 G Maxwell - Confidential</p> <p>2 pounding, no stomping, no, that's not</p> <p>3 appropriate,.</p> <p>4 A. Can we be clear, I didn't threaten</p> <p>5 anybody.</p> <p>6 MR. PAGLIUCA: Stop, you made your</p> <p>7 record, there is no dent in the table.</p> <p>8 I don't see any chips. Can we take a</p> <p>9 break now.</p> <p>10 MS. McCAWLEY: I think it's</p> <p>11 appropriate to take a break.</p> <p>12 THE VIDEOGRAPHER: It's 1:56 and we</p> <p>13 are off the record.</p> <p>14 (Recess.)</p> <p>15 THE VIDEOGRAPHER: It's now 2:13,</p> <p>16 we're starting disk No. 5 and we are</p> <p>17 back on the record.</p> <p>18 Q. Ms. Maxwell, how old was Virginia</p> <p>19 Roberts when you met her in Mar-a-Lago?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I know today that she was 17 years</p> <p>23 old.</p> <p>24 Q. Are you saying that it's an obvious</p> <p>25 lie that Virginia traveled on Jeffrey</p>
<p style="text-align: right;">Page 207</p> <p>1 G Maxwell - Confidential</p> <p>2 obvious lie that you approached Virginia</p> <p>3 while she was under age at Mar-a-Lago?</p> <p>4 MR. PAGLIUCA: Objection to the</p> <p>5 form and foundation.</p> <p>6 A. First of all, we can all agree</p> <p>7 here, all of you sitting here that the lies</p> <p>8 that you perpetrated in the press that she</p> <p>9 was 15 and we should all agree now that that</p> <p>10 is fake, a lie that was perpetrated between</p> <p>11 all of you to make the story more exciting,</p> <p>12 can we agree on that?</p> <p>13 Q. That is not my question.</p> <p>14 A. Can we agree she was not the age</p> <p>15 she said and you put that in the press, that</p> <p>16 is obviously, manifestly, absolutely, totally</p> <p>17 a lie.</p> <p>18 MS. McCAWLEY: I am going to put on</p> <p>19 the record, Ms. Maxwell very</p> <p>20 inappropriately and very harshly pounded</p> <p>21 our law firm table in an inappropriate</p> <p>22 manner. I ask she take a deep breath,</p> <p>23 and calm down. I know this is a</p> <p>24 difficult position but physical assault</p> <p>25 or threats is not appropriate, so no</p>	<p style="text-align: right;">Page 209</p> <p>1 G Maxwell - Confidential</p> <p>2 Epstein's airplanes?</p> <p>3 MR. PAGLIUCA: Objection to the</p> <p>4 form and foundation.</p> <p>5 Q. You can answer.</p> <p>6 A. Are you referring to my statement</p> <p>7 where that says that?</p> <p>8 Q. I'm referring to the language you</p> <p>9 use in your statement that says, obvious</p> <p>10 lies?</p> <p>11 A. Can you read my entire statement?</p> <p>12 Q. Sure, let me pass it out.</p> <p>13 (Maxwell Exhibit 10, email, marked</p> <p>14 for identification.)</p> <p>15 Q. This is Bates GM 00068 and we will</p> <p>16 mark it as -- what you have in front of you</p> <p>17 is a statement at the top. This was produced</p> <p>18 by your counsel, it is indicated Bates No.</p> <p>19 GM 00068. At the top the date reflects</p> <p>20 January 2, 2015 from, appears to be a [REDACTED]</p> <p>21 [REDACTED], subject line, is you and</p> <p>22 then there is a number of individuals you can</p> <p>23 see at the top that are copied on this that</p> <p>24 is sent to and bcc'd on this statement.</p> <p>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</p> <p>2 A. I'm carrying on.</p> <p>3 Q. I'm sorry. I thought you were</p> <p>4 done.</p> <p>5 A. Please. Her statement also that</p> <p>6 she was driven by her father to Palm Beach.</p> <p>7 She was driven by her mother, as a matter of</p> <p>8 fact. Her whole entire characterization of</p> <p>9 the first meeting with Jeffrey, as I was</p> <p>10 outside speaking to her mother.</p> <p>11 Q. Let me stop you there, so we don't</p> <p>12 get too far ahead. Let me make sure I</p> <p>13 understand your testimony.</p> <p>14 The first, in the first piece when</p> <p>15 you were talking, I believe you said and</p> <p>16 correct me if I'm wrong, that her</p> <p>17 characterization of the first meeting at</p> <p>18 Mar-a-Lago was an obvious lie.</p> <p>19 What part of that meeting was an</p> <p>20 obvious lie?</p> <p>21 A. By her own testimony, all her</p> <p>22 various many different descriptions of what</p> <p>23 she was or wasn't or where she was or wasn't,</p> <p>24 they have all changed. She was either front</p> <p>25 of house or bathroom attendant. I don't know</p>	<p style="text-align: right;">Page 216</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to the</p> <p>3 form and foundation.</p> <p>4 A. I was talking to her mother so...</p> <p>5 Q. Do you know whether that's an</p> <p>6 obvious lie, whether she had sex in that room</p> <p>7 or not?</p> <p>8 A. Her story about what happened --</p> <p>9 let's also be -- the story as first hit the</p> <p>10 press was that somebody else led her to</p> <p>11 Jeffrey's room, it was not me and then it</p> <p>12 turned to being me so we have an obviously</p> <p>13 important inconsistency, lie in my -- that's</p> <p>14 how I would characterize a lie. It cannot be</p> <p>15 me or somebody else, it can only be one or</p> <p>16 the other.</p> <p>17 Q. Who is the other person she said</p> <p>18 took her to the room?</p> <p>19 A. Why don't you ask her.</p> <p>20 Q. I'm asking you.</p> <p>21 A. How would I possibly know.</p> <p>22 Q. You are saying that's a lie.</p> <p>23 A. It was a lie in the papers, she</p> <p>24 said it in the newspaper, it was in the</p> <p>25 newspaper.</p>
<p style="text-align: right;">Page 215</p> <p>1 G Maxwell - Confidential</p> <p>2 what she was, so just by her own words, one</p> <p>3 doesn't know what's true and what isn't true.</p> <p>4 Q. Are you saying what position she</p> <p>5 said she was working in, is that what you are</p> <p>6 considering the obvious lie?</p> <p>7 A. I said inconsistency within her own</p> <p>8 statement from everything, so in the</p> <p>9 beginning it starts off with different</p> <p>10 statements.</p> <p>11 Q. Then I believe you said the second</p> <p>12 piece was that she was driven by her father?</p> <p>13 A. I said she was driven by her</p> <p>14 mother.</p> <p>15 Q. That's the obvious lie?</p> <p>16 A. It's an obvious lie to me.</p> <p>17 Q. You said why don't you state it in</p> <p>18 your own words but the characterization of</p> <p>19 how she was with Jeffrey, what about that is</p> <p>20 an obvious lie?</p> <p>21 A. I was standing outside talking to</p> <p>22 her mother so the entire story is a</p> <p>23 fabrication.</p> <p>24 Q. Did she not have sex with Jeffrey</p> <p>25 Epstein during that first massage?</p>	<p style="text-align: right;">Page 217</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. How do you know she wasn't</p> <p>3 identifying you?</p> <p>4 A. She said somebody.</p> <p>5 Q. How do you know that somebody</p> <p>6 wasn't you?</p> <p>7 A. Why did it suddenly become me, why</p> <p>8 not say it was me and be done with it.</p> <p>9 Q. So it's a lie because she</p> <p>10 originally may not have named you and then</p> <p>11 named you later?</p> <p>12 A. It's obviously inconsistent to</p> <p>13 somebody who wasn't me.</p> <p>14 Q. How do you know it wasn't you?</p> <p>15 A. I know it wasn't me because I was</p> <p>16 talking to her mother.</p> <p>17 Q. But she then named you, is what you</p> <p>18 are saying?</p> <p>19 A. That's an obvious lie.</p> <p>20 Q. She named you?</p> <p>21 A. It's an obvious lie because I</p> <p>22 wasn't even in the house.</p> <p>23 Q. Is it an obvious -- who did lead</p> <p>24 her up to Jeffrey's room while you were</p> <p>25 talking to her mother?</p>

Page 218

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]

Page 219

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

Page 220

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

Page 221

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

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

<p style="text-align: right;">Page 226</p> <p>1 G Maxwell - Confidential</p> <p>2 A. No. I did not state that at all,</p> <p>3 you are mischaracterizing my words and what I</p> <p>4 said.</p> <p>5 What I said was that we can all</p> <p>6 agree and I think at this point there is not</p> <p>7 one person in this room, however much you</p> <p>8 would like her to be younger, to say she was</p> <p>9 not 17 because that has been a very offensive</p> <p>10 thing that you have all done. So she was 17.</p> <p>11 At 17 you are allowed to be a professional</p> <p>12 masseuse and as far as I'm concerned, she was</p> <p>13 a professional masseuse. There is nothing</p> <p>14 inappropriate or incorrect about her coming</p> <p>15 at that time to give a massage. Her entire</p> <p>16 characterization of her first time at the</p> <p>17 house was to me an obvious lie, given it was</p> <p>18 impossible for her entire story to take place</p> <p>19 given I was speaking to her mother the entire</p> <p>20 she was at the house.</p> <p>21 Q. So it was impossible that day, that</p> <p>22 first day she came and you were speaking to</p> <p>23 the mother, for Virginia Roberts to have had</p> <p>24 sex with Jeffrey Epstein during the time that</p> <p>25 you were outside with her mother?</p>	<p style="text-align: right;">Page 228</p> <p>1 G Maxwell - Confidential</p> <p>2 absolutely 1000 percent that she did not have</p> <p>3 any type of sexual relations as described by</p> <p>4 you in your court papers that took place</p> <p>5 because those allegedly according to her lies</p> <p>6 involved some aspect of me.</p> <p>7 As I was standing outside with her</p> <p>8 mother the entire time, her entire story is a</p> <p>9 lie. Therefore, to ask me what she did or</p> <p>10 didn't do during that time, I can only</p> <p>11 testify to what she said about me, which was</p> <p>12 1000 percent false.</p> <p>13 Q. So let's not take the first time,</p> <p>14 let's take the next time she comes.</p> <p>15 A. No no, how can do you that, when</p> <p>16 the basis of this entire horrible story that</p> <p>17 you have put out is based on this first</p> <p>18 appalling story that was written, repeated,</p> <p>19 multiply by the press that lied about her</p> <p>20 age, lied about the first time she came, lied</p> <p>21 about and characterized the entire first</p> <p>22 time. I have been so absolutely appalled by</p> <p>23 her story and appalled by the entire</p> <p>24 characterization of it and I apologize</p> <p>25 sincerely for my banging at the table</p>
<p style="text-align: right;">Page 227</p> <p>1 G Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Objection to the</p> <p>3 form and foundation.</p> <p>4 A. You, again, are completely</p> <p>5 mischaracterizing. I can only testify to</p> <p>6 what I heard obvious lies about me and her</p> <p>7 obvious lies about me are that she, as you</p> <p>8 put out to the papers and every other which</p> <p>9 way, went upstairs with her, didn't happen.</p> <p>10 So that to me is an absolute, obvious lie. I</p> <p>11 also don't believe that her -- her</p> <p>12 mischaracterization of the length of time she</p> <p>13 was there because as I recall, she just met</p> <p>14 with Jeffrey and then left with her mother.</p> <p>15 That's my recollection.</p> <p>16 Q. So you were standing outside the</p> <p>17 entire time that Virginia was in the house,</p> <p>18 is that correct?</p> <p>19 A. That is correct.</p> <p>20 Q. So can you testify as to whether or</p> <p>21 not, do you know either from Jeffrey or any</p> <p>22 other source whether or not Virginia Roberts</p> <p>23 had sex with Jeffrey on that first day that</p> <p>24 she was at the house?</p> <p>25 A. We can categorically state,</p>	<p style="text-align: right;">Page 229</p> <p>1 G Maxwell - Confidential</p> <p>2 earlier, I hope you accept my apology. It's</p> <p>3 borne out of years of feeling the pressure of</p> <p>4 this entire lie that she has perpetrated from</p> <p>5 our first time and whilst I recognize that</p> <p>6 was -- I hope you forgive me sincerely</p> <p>7 because it was just the length of time that</p> <p>8 that terrible story has been told and retold</p> <p>9 and rehashed when I know it to be 100 percent</p> <p>10 false.</p> <p>11 Q. So not the first time she came, but</p> <p>12 the second time she came or the third time or</p> <p>13 any time she came, did you ever participate</p> <p>14 in a massage with her in Jeffrey Epstein's</p> <p>15 room?</p> <p>16 A. I have never participated at any</p> <p>17 time with Virginia in a massage with Jeffrey.</p> <p>18 Q. Have you ever participated at any</p> <p>19 time with Virginia in any kind of sexual</p> <p>20 contact or sexual touching with Jeffrey and</p> <p>21 Virginia?</p> <p>22 A. I have not.</p> <p>23 Q. So we were going through the list</p> <p>24 of obvious lies and you were talking about</p> <p>25 the first time which I believe we have</p>

Page 230

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

Page 231

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

Page 232

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.

Page 233

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

Page 234

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.

Page 235

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]
 [REDACTED]

Page 236

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

Page 237

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

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

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

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

Page 254

1 G Maxwell - Confidential
 2 to recruit underage girls for sexual
 3 massages?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 Q. If you know.
 7 A. I don't know what you are talking
 8 about.
 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?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 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.
 19 Q. Would Jeffrey Epstein's assistants
 20 arrange times for underage girls to come to
 21 the house for sexual massages?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. What are you talking about?
 25 Q. Sure. Would Jeffrey Epstein's

Page 255

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 of [REDACTED].
 5 Would Jeffrey Epstein's assistants arrange
 6 times for underage girls to come over the
 7 house for sexual massages?
 8 MR. PAGLIUCA: Objection to the
 9 form and foundation.
 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.
 16 Q. So you don't know?
 17 A. No.
 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?
 23 MR. PAGLIUCA: Object to the form
 24 and foundation.
 25 A. During what period of time?

Page 256

1 G Maxwell - Confidential
 2 Q. During any period of time you
 3 worked, did you observe that?
 4 A. I did not observe any such
 5 photographs.
 6 Q. Are you aware if they took those
 7 kinds of photos?
 8 A. I am not aware.
 9 MR. PAGLIUCA: Can we take a
 10 five-minute break.
 11 THE VIDEOGRAPHER: It's 2:58 and we
 12 are off the record.
 13 (Recess.)
 14 THE VIDEOGRAPHER: It's now 3:10.
 15 We're starting disk No. 6 and we are
 16 back on the record.
 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?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I have no knowledge of Virginia
 23 being sent to Thailand.
 24 But may I say something?
 25 Q. There is not a question pending

Page 257

1 G Maxwell - Confidential
 2 unless you want to clarify something.
 3 Did you want to clarify that?
 4 A. No, I just wanted to say something.
 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?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. Can you repeat the question?
 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?
 16 MR. PAGLIUCA: Same objection.
 17 A. I have no idea what instructions
 18 Virginia was given, if any, when she went to
 19 Thailand.
 20 Q. So you know she went to Thailand?
 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.
 25 Q. Would it make any sense for her to

Page 258

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

Page 259

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

Page 260

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: Object to the form.
 18 A. I have to idea.
 19 Q. Why would Virginia be instructed to
 20 call Ms. Maxwell at your number on this form?
 21 MR. PAGLIUCA: Objection to the
 22 form and foundation.
 23 A. I don't know what this document is.
 24 I don't know when it was done, I don't know
 25 anything about it other than I can see it has

Page 261

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.

Page 262

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

Page 263

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.

Page 264

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

Page 265

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

Page 266

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

Page 267

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]

Page 268

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.

Page 269

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?

Page 270

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?

Page 271

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.

Page 272

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

Page 273

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

Page 274

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,

Page 275

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.

Page 276

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

Page 277

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

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

<p style="text-align: right;">Page 282</p> <p>1 G Maxwell - Confidential</p> <p>2 what she --</p> <p>3 MR. PAGLIUCA: She is asking you a</p> <p>4 different question. She is asking other</p> <p>5 than what your lawyers have told you, do</p> <p>6 you have any knowledge about her being</p> <p>7 17, that's what she is asking.</p> <p>8 A. I can't recollect where I got all</p> <p>9 the information that I have that definitively</p> <p>10 shows that.</p> <p>11 Q. Earlier in your testimony, I</p> <p>12 believe you said all of us would know that</p> <p>13 Virginia was 17 at the time you met her.</p> <p>14 How would we know that?</p> <p>15 A. I think you know that by her own</p> <p>16 dates, now that it was in 2000, so her entire</p> <p>17 tail of me celebrating her 16th birthday is</p> <p>18 clearly another giant falsehood.</p> <p>19 Q. But she was 16 and 17 that year,</p> <p>20 wasn't she?</p> <p>21 A. Which year?</p> <p>22 Q. You said it was 2000.</p> <p>23 A. I think the information that I have</p> <p>24 that indicates that definitively was</p> <p>25 something that is privileged, so I can't</p>	<p style="text-align: right;">Page 284</p> <p>1 G Maxwell - Confidential</p> <p>2 calls for a communication that you had</p> <p>3 with one of your lawyers, I'm</p> <p>4 instructing you not to answer that</p> <p>5 question.</p> <p>6 Q. I assume you, as part of the</p> <p>7 discovery process, had to collect documents</p> <p>8 that were relevant to this action, is that</p> <p>9 correct?</p> <p>10 A. I did.</p> <p>11 Q. Did you collect documents that</p> <p>12 would show that Virginia was 17 at the time</p> <p>13 that you met her?</p> <p>14 A. I think you have everything that</p> <p>15 relates, that I had, contemporaneously per</p> <p>16 what you asked for that I have that relates</p> <p>17 to that.</p> <p>18 Q. Did you have a document that</p> <p>19 identified that Virginia was 17 at the time</p> <p>20 that you met her?</p> <p>21 A. You have all of the documents that</p> <p>22 I had.</p> <p>23 Q. I'm not asking what documents. I'm</p> <p>24 asking, do you have a document that</p> <p>25 identifies Virginia being 17 at the time you</p>
<p style="text-align: right;">Page 283</p> <p>1 G Maxwell - Confidential</p> <p>2 share with you.</p> <p>3 Q. So you have privileged information</p> <p>4 that definitively tells you that she was 17</p> <p>5 at the time you met her?</p> <p>6 A. I believe I do.</p> <p>7 Q. How would we know that?</p> <p>8 A. What are you asking me?</p> <p>9 Q. Earlier today you testified that we</p> <p>10 would know that she was 17 at the time that</p> <p>11 you met her.</p> <p>12 How would we know that?</p> <p>13 A. I imagine you have access to</p> <p>14 exactly the same information that I do.</p> <p>15 Q. What is that information?</p> <p>16 A. Again, it's privileged, I can't</p> <p>17 share it with you but you have been on this</p> <p>18 case for, I don't know, much much longer than</p> <p>19 I have and I imagine you have all the</p> <p>20 information that I do.</p> <p>21 Q. Do you know whether your lawyers</p> <p>22 have produced documents from you that would</p> <p>23 show the age that Virginia was at the time</p> <p>24 that you met her?</p> <p>25 MR. PAGLIUCA: To the extent that</p>	<p style="text-align: right;">Page 285</p> <p>1 G Maxwell - Confidential</p> <p>2 met her?</p> <p>3 A. You have every document that I</p> <p>4 have. You have seen every document that I</p> <p>5 have.</p> <p>6 Q. That's not what I'm asking.</p> <p>7 A. I don't recall every document that</p> <p>8 I gave you, so I don't know. I would have to</p> <p>9 look at every single document I gave you and</p> <p>10 then review it but as I recall you have every</p> <p>11 document that I have.</p> <p>12 Q. What are you planning to show the</p> <p>13 jury that will prove that Virginia was 17</p> <p>14 when you met her?</p> <p>15 A. Again that's privileged so I can't</p> <p>16 share that with you.</p> <p>17 Q. If you're showing the jury, it</p> <p>18 wouldn't be privileged, so is there a</p> <p>19 document you have produced in this matter</p> <p>20 that shows that Virginia was 17 at the time</p> <p>21 you met her?</p> <p>22 MR. PAGLIUCA: She answered that</p> <p>23 question already. She said she doesn't</p> <p>24 know, she has given you everything. If</p> <p>25 there is a decision -- assuming for the</p>

Page 286

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.

Page 287

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

Page 288

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

Page 289

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]

Page 290

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.

Page 291

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

Page 292

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?

Page 293

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]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

Page 294

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.

Page 295

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

Page 296

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

Page 297

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

Page 302

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

Page 303

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]

Page 304

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 [REDACTED]
 21 A. I do recollect a person of that
 22 name.
 23 Q. How do you know her?
 24 A. I don't recollect.
 25 Q. Did you meet her through Jeffrey?

Page 305

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]

Page 306

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

Page 307

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

Page 308

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?

Page 309

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

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

Page 318

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

Page 319

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

Page 320

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?

Page 321

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?

Page 322

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.

Page 323

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

Page 324

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

Page 325

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.

Page 326

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

Page 327

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

Page 328

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]

Page 329

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

Page 330

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

Page 331

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

Page 332

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

Page 333

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

Page 334

1 G Maxwell - Confidential
 2 addresses affiliated with Jeffrey Epstein
 3 from your computer?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 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.
 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?
 13 MR. PAGLIUCA: I'm going to object
 14 unless you show the witness the
 15 document.
 16 MS. McCAWLEY: I will pass it. We
 17 are not going to mark it. We will skip
 18 it.
 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?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. It doesn't sound like anything I

Page 335

1 G Maxwell - Confidential
 2 would say.
 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?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I'm happy to answer. No, I never
 10 threatened him in any way.
 11 Q. Were you concerned that he was
 12 going to disclose that Jeffrey Epstein was
 13 trafficking underage girls?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation.
 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.
 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?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. I have never called anybody with

Page 336

1 G Maxwell - Confidential
 2 reference to this case with any, anything you
 3 just mentioned, I never threatened anyone.
 4 Q. Have you ever directed anyone to
 5 call any witnesses relevant to this case and
 6 threaten them not to testify?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I never done such a thing.
 10 Q. Did Jeffrey Epstein or you ever ask
 11 any female, regardless of age, to carry
 12 Jeffrey's baby for him?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation.
 15 Q. Or anything along those lines?
 16 MR. PAGLIUCA: Objection to the
 17 form and foundation.
 18 A. Can you repeat the question,
 19 please?
 20 Q. Did you or Jeffrey Epstein ever ask
 21 any female, regardless of age, to carry
 22 Jeffrey Epstein's baby for him?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. Are you asking --

Page 337

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?
 6 MR. PAGLIUCA: Objection to form
 7 and foundation.
 8 A. You need to be very specific. I
 9 have no idea what you are talking about.
 10 That's completely rubbish.
 11 Q. Did you or Jeffrey Epstein ask any
 12 female to become pregnant and carry his baby
 13 for either him or you?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation. Go ahead.
 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.
 20 Q. Or anything along those lines?
 21 MR. PAGLIUCA: Object to the form
 22 and foundation.
 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?

Page 338

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.

Page 339

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.

Page 340

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

Page 341

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

Page 342

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

Page 343

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?

Page 344

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

Page 345

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.

Page 346

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

Page 347

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?

Page 348

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

Page 349

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

Page 350

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.)

Page 351

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 acquaints, 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

Page 352

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

Page 353

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

Page 354

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.
 5 Why were you concerned with the age
 6 of consent in Florida?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation of the question.
 9 A. I wasn't concerned. I think this
 10 was somebody sending me the statute for
 11 informational purposes.
 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.
 16 Q. I didn't hear you?
 17 A. I [REDACTED], I'm not
 18 sure exactly.
 19 Q. Why would he be sending you
 20 information addressing concerns about the age
 21 of consent in Florida?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. I think he was just trying to be --
 25 telling me details that would happen,

Page 355

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.
 7 Q. Did you have a concern that you had
 8 violated this statute in Florida?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. No.
 12 Q. Did you have a concern that Jeffrey
 13 Epstein had violated this statute in Florida?
 14 A. I'm not concerned what happened
 15 with Jeffrey. I'm only concerned what
 16 happens with me.
 17 Q. Why did you communicate with [REDACTED]
 18 [REDACTED] about the sexual consent age in
 19 Florida?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation. It misstates her
 22 testimony.
 23 A. I wasn't concerned. I think he was
 24 being helpful and stating what the statute
 25 was.

Page 356

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.
 10 Were you communicating with Jeffrey
 11 to confirm what statements you could put in
 12 any press releases you were given?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation.
 15 A. Any interest I have is in accuracy.
 16 Q. Were you confirming with Jeffrey
 17 Epstein what information you could put in
 18 press releases?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. Again, I'm only looking for
 22 accuracy.
 23 Q. Why would you ask him if he had a
 24 problem with anything you were saying?
 25 A. If there is anything I

Page 357

1 G Maxwell - Confidential
 2 characterized that was not correct.
 3 Q. That's not what you said. You
 4 said, do you have a problem with anything I
 5 said.
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation. There is no
 8 question pending.
 9 MS. McCAWLEY: There is.
 10 MR. PAGLIUCA: That's not a
 11 question, it's a statement.
 12 MS. McCAWLEY: Don't interrupt me.
 13 Q. Di you say, do you have a problem
 14 with anything I said?
 15 A. That was asking in my parlance that
 16 I wanted him to check it for accuracy.
 17 Q. Did he tell you there was anything
 18 inaccurate about the statement?
 19 A. Again, I have to read the whole
 20 thing to figure that out.
 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?
 25 MR. PAGLIUCA: Did you withdraw the

Page 358

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.

Page 359

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?

Page 360

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.

Page 361

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

Page 362

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

Page 363

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.

Page 364

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?

Page 365

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

Page 366

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 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

Page 367

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 labled 001060. At the top is a chain

Page 368

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

Page 369

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?

Page 370

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

Page 371

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.

Page 372

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.

Page 373

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

Page 374

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

Page 375

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

Page 376

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.

Page 377

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

Page 378

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.

Page 379

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

Page 380

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

Page 381

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

<p style="text-align: right;">Page 386</p> <p>1 G Maxwell - Confidential</p> <p>2 issued is the one that you have.</p> <p>3 Q. When the paragraph refers to you</p> <p>4 being in a very long term committed</p> <p>5 relationship with another man, who was that</p> <p>6 other man?</p> <p>7 MR. PAGLIUCA: You don't have to</p> <p>8 answer the question.</p> <p>9 MS. McCAWLEY: I'm asking the</p> <p>10 identity of a witness in a statement she</p> <p>11 is giving.</p> <p>12 MR. PAGLIUCA: She didn't give the</p> <p>13 statement.</p> <p>14 MS. McCAWLEY: Jeffrey is writing</p> <p>15 to her, I'm asking who is he is</p> <p>16 referencing to a long term relationship.</p> <p>17 You are going to refuse to let her</p> <p>18 answer that question.</p> <p>19 MR. PAGLIUCA: Yes.</p> <p>20 MS. McCAWLEY: I would like to</p> <p>21 state for the record he is refusing to</p> <p>22 allow her to identify a potential</p> <p>23 witness in this litigation. So we will</p> <p>24 be back to get the answer to that</p> <p>25 question.</p>	<p style="text-align: right;">Page 388</p> <p>1 G Maxwell - Confidential</p> <p>2 affiliated with?</p> <p>3 A. No.</p> <p>4 Q. Is that a company that Jeffrey</p> <p>5 owns?</p> <p>6 A. I knew it back in 2001, back when I</p> <p>7 was working. I have no idea what that is</p> <p>8 today.</p> <p>9 Q. What about JEJE, are you familiar</p> <p>10 with that company, JEJE Inc.?</p> <p>11 A. I don't recall it.</p> <p>12 Q. You don't recall?</p> <p>13 A. It vaguely rings a bell. I don't</p> <p>14 remember what it relates to.</p> <p>15 Q. What about J Epstein Virgin Islands</p> <p>16 Foundation, Inc.</p> <p>17 Are you familiar with that company?</p> <p>18 A. No.</p> <p>19 Q. How did J Epstein & Company, Inc.?</p> <p>20 A. Again, I don't recall his business</p> <p>21 names and affiliations.</p> <p>22 Q. How about NES LLC, are you familiar</p> <p>23 with that name?</p> <p>24 A. Again, I think that was one of his</p> <p>25 businesses, but I don't recall.</p>
<p style="text-align: right;">Page 387</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Do you recall when you were</p> <p>3 traveling with Virginia Roberts that you</p> <p>4 would be responsible for holding her</p> <p>5 passport?</p> <p>6 MR. PAGLIUCA: Objection to the</p> <p>7 form and foundation.</p> <p>8 A. I already testified I don't recall</p> <p>9 traveling with Virginia.</p> <p>10 Q. Do you recall whether Jeffrey</p> <p>11 Epstein when he was traveling with a minor,</p> <p>12 someone under the age of 18, someone would</p> <p>13 hold their passport?</p> <p>14 MR. PAGLIUCA: Object to the form.</p> <p>15 A. I couldn't testify to what Jeffrey</p> <p>16 did or didn't do.</p> <p>17 Q. You never observed him gathering a</p> <p>18 minor's passport and holding it during one of</p> <p>19 the trips you were on?</p> <p>20 A. I don't have a recollection of</p> <p>21 that.</p> <p>22 Q. Are you familiar with a company</p> <p>23 called Hyperion Air Inc.?</p> <p>24 A. I am.</p> <p>25 Q. Is that a company you are</p>	<p style="text-align: right;">Page 389</p> <p>1 G Maxwell - Confidential</p> <p>2 Q. Do you know what that business did?</p> <p>3 A. I don't.</p> <p>4 Q. How about New York Strategy Group</p> <p>5 Inc.?</p> <p>6 A. I don't know.</p> <p>7 Q. What about Ghislaine Maxwell</p> <p>8 Company, are you familiar with that company?</p> <p>9 A. I never heard of that.</p> <p>10 Q. Is that a company you are on record</p> <p>11 as being either a board member of or having a</p> <p>12 position of authority in?</p> <p>13 MR. PAGLIUCA: Objection to the</p> <p>14 form and foundation.</p> <p>15 A. I've never heard of the business.</p> <p>16 Q. What negative, unflattering,</p> <p>17 private or potentially embarrassing</p> <p>18 information does Jeffrey Epstein know about</p> <p>19 you?</p> <p>20 MR. PAGLIUCA: Objection to the</p> <p>21 form and foundation.</p> <p>22 A. I imagine none.</p> <p>23 Q. Does he know, does he have any</p> <p>24 knowledge of any illegal activity that you've</p> <p>25 conducted?</p>

Page 390

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

Page 391

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,

Page 392

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?

Page 393

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.

Page 394

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

Page 395

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?

Page 396

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

Page 397

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

Page 398

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.

Page 399

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.

Page 400

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

Page 401

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

Page 402

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.

Page 403

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

Page 404

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

Page 405

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.

Page 406

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.

Page 407

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?

Page 408

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.

Page 409

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.

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 411

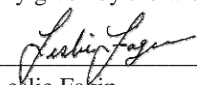

1 G Maxwell - Confidential
2 arrangements?
3 A. I don't recall.
4 Q. Were you ever responsible for
5 making those arrangements for other
6 individuals?
7 A. I don't recall making flight
8 arrangements.
9 Q. Was it a New York travel agent that
10 you would use for those arrangements?
11 A. Again, we are 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

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 413

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.)
21
22
23
24
25

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