

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

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,  
  
Plaintiff,

v.

GHISLAINE MAXWELL,  
  
Defendant.

\_\_\_\_\_ /

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.  
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company  
B. Paul Katz Professional Center  
(SunTrust Building)  
One Florida Park Drive South  
Suite 214  
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR  
Florida Professional Reporter  
Court Reporter and Notary Public

1           Q     I guess my question is: Did she ever tell  
2     you that she had started as a regular masseuse for  
3     him and then transitioned to something other than a  
4     masseuse?

5           A     No. She never said that it transitioned.  
6     But she ended up explaining to me what had happened  
7     before, so...

8           Q     What has -- what is that?

9           A     That her and Ms. Maxwell and Jeffrey would  
10    obviously be doing stuff, all three of them  
11    together. Like I said, that they would all go out  
12    to clubs to pick up girls and try and find them to  
13    bring back for Jeffrey. And then she told me about  
14    how, like I said, her and Ms. Maxwell and Jeffrey  
15    were all intimate together on multiple occasions.

16          Q     When did she tell you this?

17          A     I'm not exactly sure on the dates.

18          Q     Was it while you were still together?

19          A     Yes.

20          Q     Did you -- had you met Ms. Maxwell?

21          A     Yeah, I had met her a couple of times.

22          Q     When did you meet Ms. Maxwell?

23          A     Dates, I'm unsure of. But it was pretty  
24    much, like I said, at Jeffrey's house in the  
25    kitchen.

1           Q     Was it earlier in the time you were with  
2     her, or...

3           A     It was about -- I'd say about six months  
4     or so. I don't know. I'm not exactly positive.

5           Q     All right. So at the time you met  
6     Ms. Maxwell, had Ms. Roberts already told you that  
7     she had been intimate?

8           A     No. She had told me about that, I  
9     believe, after I had max- -- after I had already met  
10    her.

11          Q     Okay. And tell me everything that you  
12    remember about what Ms. Roberts said about being  
13    intimate with Ms. Maxwell and Mr. Epstein at the  
14    same time.

15          A     I remember her talking about, like,  
16    strap-ons and stuff like that. But, I mean, like I  
17    said, all the details are not really that clear.  
18    But I remember her talking about, like, how they  
19    would always be using and stuff like that.

20          Q     She and Ms. Maxwell and Mr Epstein would  
21    used strap-ons?

22          A     Uh-huh (affirmative).

23          Q     How did you feel about that?

24          A     I just -- obviously not happy about it.

25          Q     What did you say?

1           A     I did not.

2           Q     When the FBI interviewed you, did you  
3 mention this to them?

4           A     I mentioned -- anything they asked me, I  
5 did not hold anything back.

6           Q     Okay. Do you recall specifically talking  
7 about sex with the Prince?

8           A     I -- I don't recall talking to them about  
9 that, but, I mean, it's -- it could be possible.

10          Q     Other than sex with the Prince, is there  
11 anyone else that Jeffrey wanted Ms. Roberts to have  
12 sex with that she relayed to you?

13          A     Mainly, like I said, just Ms. Maxwell and  
14 all the other girls.

15          Q     Ms. Maxwell wanted -- Jeffrey wanted  
16 Virginia to have sex with Ms. Maxwell?

17          A     And him, yeah.

18          Q     And did she tell you whether she had ever  
19 done that?

20          A     Yeah. She said that she did.

21          Q     And when did she tell you that?

22          A     I'm not sure on the date.

23          Q     And what did she describe having happened?

24          A     I believe I already told you that. With  
25 the strap-ons and dildos and everything.

1 MS. MENNINGER: Objection. Form.

2 Foundation.

3 A For Jeffrey.

4 BY MR. EDWARDS:

5 Q All right. Let me fix this. Ghislaine --  
6 when Ghislaine Maxwell would call you during the  
7 time that you were living with Virginia, she would  
8 ask you what, specifically?

9 MS. MENNINGER: Objection. Form.

10 Foundation.

11 A Just if I had found any other girls just  
12 to bring to Jeffrey.

13 BY MR. EDWARDS:

14 Q Okay.

15 A Pretty much every time there was a  
16 conversation with any of them, it was either asking  
17 Virginia where she was at, or asking her to get  
18 girls, or asking me to get girls.

19 Q All right. Let's go to that second  
20 category you just identified, which is asking  
21 Virginia to get girls. How many times were you in a  
22 room where specifically Ghislaine Maxwell would ask  
23 Virginia to bring girls?

24 A None that I can recall.

25 Q Okay. How many times -- when you say they

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

May 18, 2016

9:04 a.m.

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

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

1 Q. Okay. Great.

2 All right. Do you know a female by the  
3 name of Ghislaine Maxwell?

4 A. Yes.

5 Q. And when did you first meet Ms. Maxwell?

6 A. 2001. March probably. End of  
7 February/beginning of March.

8 Q. And how did you meet her?

9 A. She approached me while I was on campus at  
10 Palm Beach Atlantic College.

11 Q. And what happened when she approached you?

12 A. She asked me if I could tell her how to  
13 find someone that would come and work at her house.  
14 She wanted to know if there was, like, a bulletin  
15 board or something that she could post, that she was  
16 looking for someone to hire.

17 Q. And what did you discuss with her?

18 A. I told her where she could go to -- you  
19 know, to put up a listing. And then she asked me if  
20 I knew anyone that would be interested in working  
21 for her.

22 Q. Did she describe what that work was going  
23 to be?

24 A. She explained that she lived in Palm Beach  
25 and didn't want butlers because they're too stuffy.



1 And so she just liked to hire girls to work at the  
2 house, answer phones, get drinks, do the job a  
3 butler would do.

4 Q. And did she tell you what she would pay  
5 for that kind of a job?

6 A. At that moment, no, but later in the day,  
7 yes.

8 Q. And what did she say?

9 A. Twenty dollars an hour.

10 Q. Was there anybody else with Ms. Maxwell  
11 when you met her?

12 A. There was another woman with her. I don't  
13 recall her or what she looks like or how old she  
14 was.

15 Q. And what happened next?

16 A. And then she asked me if I would be  
17 interested in working for her. And she told me that  
18 she was -- I could trust her and that I could jump  
19 in her car and go check out the house at that moment  
20 if I wanted.

21 And so I said, Sure, let's do it, and went  
22 to her home with her.

23 Q. And where was that home?

24 A. In Palm Beach.

25 Q. And did she describe that home as being

1 Q. And how long did you work in that position  
2 answering phones and doing --

3 A. Just that one day.

4 Q. Just that one day.

5 And did your duties change?

6 A. Well, the next time she called me, she  
7 asked me if I wanted to come over and make \$100 an  
8 hour rubbing feet.

9 Q. And what did you think of that offer?

10 A. I thought it was fantastic.

11 Q. And did you come over to the house for  
12 that purpose?

13 A. Yes.

14 Q. And when you came over to the house, was  
15 Maxwell present?

16 A. I don't recall.

17 Q. And what happened that second time you  
18 came to the house?

19 A. At that point, I met Emmy Taylor, and she  
20 took me up to Jeffrey's bathroom and he was present.  
21 And her and I both massaged Jeffrey. She was  
22 showing me how to massage.

23 And then she -- he took -- he got off the  
24 table, she got on the table. She took off her  
25 clothes, got on the table, and then he was showing

1 MS. MENNINGER: Objection, leading.

2 BY MS. McCAWLEY:

3 Q. Do you believe that from your  
4 observations, Maxwell and Epstein were boyfriend and  
5 girlfriend?

6 A. Initially, yes.

7 Q. Did Maxwell ever share with you whether it  
8 bothered her that Jeffrey had so many girls around?

9 MS. MENNINGER: Objection, leading,  
10 hearsay.

11 THE WITNESS: No. Actually, the opposite.

12 BY MS. McCAWLEY:

13 Q. What did she say?

14 A. She let me know that she was -- she would  
15 not be able to please him as much as he needed and  
16 that is why there were other girls around.

17 Q. Did there ever come a time -- did you ever  
18 take a photography class in school?

19 A. Yes.

20 Q. And did there ever come a time when  
21 Maxwell offered to buy you a camera?

22 A. Yes.

23 MS. MENNINGER: Objection, leading.

24 BY MS. McCAWLEY:

25 Q. Did Maxwell ever offer to buy you a

1 camera?

2 MS. MENNINGER: Objection, leading.

3 THE WITNESS: Yes.

4 BY MS. McCAWLEY:

5 Q. Was there anything you were supposed to do  
6 in order to get the camera?

7 MS. MENNINGER: Objection, leading.

8 THE WITNESS: I did not know that there  
9 were expectations of me to get the camera until  
10 after. She had purchased the camera for me,  
11 and I was over there giving Jeffrey a massage.  
12 I did not know that she was in possession of  
13 the camera until later.

14 She told me -- called me after I had left  
15 and said, I have the camera for you, but you  
16 cannot receive it yet because you came here and  
17 didn't finish your job and I had to finish it  
18 for you.

19 BY MS. McCAWLEY:

20 Q. And did you -- what did you understand her  
21 to mean?

22 A. She was implying that I did not get  
23 Jeffrey off, and so she had to do it.

24 Q. And when you say "get Jeffrey off," do you  
25 mean bring him to orgasm?

1 A. Yes.

2 Q. Did Ghislaine ever describe to you what  
3 types of girls Jeffrey liked?

4 A. Model types.

5 Q. Did Ghislaine ever talk to you about how  
6 you should act around Jeffrey?

7 A. She just had a conversation with me that I  
8 should always act grateful.

9 Q. Did Jeffrey ever tell you that he took a  
10 girl's virginity?

11 A. He did not tell me. He told a friend of  
12 mine.

13 Q. And what do you recall about that?

14 MS. MENNINGER: Objection, hearsay,  
15 foundation.

16 THE WITNESS: He wanted to have a friend  
17 of mine come out who was cardio-kickboxer  
18 instructor. She was a physical trainer.

19 And so I brought her over to the house,  
20 and he told my friend Rachel that -- he said,  
21 You see that girl over there laying by the  
22 pool? She was 19. And he said, I just took  
23 her virginity. And my friend Rachel was  
24 mortified.

25

1 exposed her bra, and she grabbed it and pulled it  
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told  
5 her that he had taken this girl's virginity, the  
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it  
8 takes the pressure off of her to have other girls  
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if  
14 Maxwell ever asked you to perform any sexual acts,  
15 and I believe your testimony was no, but then you  
16 also previously stated that during the camera  
17 incident that Maxwell had talked to you about not  
18 finishing the job.

19 Did you understand "not finishing the job"  
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that  
24 question.

25 What did you understand Maxwell to mean

1 when she said you hadn't finished the job, with  
2 respect to the camera?

3 MS. MENNINGER: Objection, leading, form.

4 THE WITNESS: She implied that I had not  
5 brought him to orgasm.

6 BY MS. McCAWLEY:

7 Q. So is it fair to say that Maxwell expected  
8 you to perform sexual acts when you were massaging  
9 Jeffrey?

10 MS. MENNINGER: Objection, leading, form,  
11 foundation.

12 THE WITNESS: I can answer?

13 Yes, I took that conversation to mean that  
14 is what was expected of me.

15 BY MS. McCAWLEY:

16 Q. And then you mentioned, I believe, when  
17 you were testifying earlier that Jeffrey told you a  
18 story about sex on the plane. What was that about?

19 MS. MENNINGER: Objection, hearsay.

20 THE WITNESS: He told me one time Emmy was  
21 sleeping on the plane, and they were getting  
22 ready to land. And he went and woke her up,  
23 and she thought that meant he wanted a blow  
24 job, so she started to unzip his pants, and he  
25 said, No, no, no, you just have to be awake for

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:  
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

\*\*CONFIDENTIAL\*\*

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

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MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026  
(866) 624-6221



1 R. Rizzo - Confidential

2 Q. Did you learn whether your  
3 perception was correct?

4 MR. PAGLIUCA: Same objection.

5 A. It was younger. Yes, I did.

6 Q. How old was this girl?

7 A. 15 years old.

8 Q. What happens next when Ghislaine  
9 Maxwell and Jeffrey Epstein and a 15-year-old  
10 girl walk into Eva Anderson's home?

11 MR. PAGLIUCA: Object to the form.  
12 Foundation.

13 A. They proceed into the dining room  
14 area, which is across from the living room  
15 area. I go into the kitchen and I hear a  
16 conversation start. Very muffled, I could  
17 not hear any particulars about the  
18 conversation whatsoever.

19 My wife and I are in the kitchen  
20 preparing the evening meal. Eva brings the  
21 young girl into the kitchen. In the kitchen,  
22 there is an island with three barstools. Eva  
23 instructs the young girl to sit to the  
24 furthest barstool on the right.

25 Q. Describe for me what the girl

1 R. Rizzo - Confidential

2 looked like, including her demeanor and  
3 anything else you remember about her when she  
4 walks into the kitchen.

5 A. Very attractive, beautiful young  
6 girl. Makeup, very put together, casual  
7 dress. But she seemed to be upset, maybe  
8 distraught, and she was shaking, and as she  
9 sat down, she sat down and sat in the stool  
10 exactly the way the girls that I mentioned to  
11 you sat at Jeffrey's house, with no  
12 expression and with their head down. But we  
13 could tell that she was very nervous.

14 Q. What do you mean by distraught and  
15 shaking, what do you mean by that?

16 A. Shaking, I mean literally  
17 quivering.

18 Q. What happens next?

19 A. We were, again, the absurdity,  
20 never introduced. Like you would walk into a  
21 room and say this is -- so my wife and I are  
22 in the kitchen and this young girl is sitting  
23 there. It was a very uncomfortable moment.  
24 I look at my wife. And so I want to ease the  
25 moment, and so I introduced myself and I

1 R. Rizzo - Confidential

2 introduced my wife, and she doesn't really  
3 respond.

4 And I asked her, are you okay? And  
5 she doesn't really respond. Nothing verbal,  
6 no cues, her head is still down. I ask her  
7 if she would like some water, tissue,  
8 anything, and she basically doesn't respond.

9 Q. You ask her for a tissue?

10 A. If she would like a tissue or some  
11 water at the time.

12 Q. Was she crying at the time?

13 A. My perception, she was on the verge  
14 of crying. And I'm trying to loosen the  
15 situation every way I know how, so the only  
16 way I knew how, and I thought maybe this will  
17 comfort her, I said oh, by the way, do you  
18 work for Jeffrey.

19 And she says that, I guess kind of  
20 made her feel comfortable, because maybe it  
21 was that comment or my persistence, and she  
22 said yes. So I said, what do you do? And  
23 she says I'm Jeffrey's executive assistant,  
24 personal assistant. Which, from looking at  
25 her, just didn't seem to suit.

1 R. Rizzo - Confidential

2 And I blurted out: You're his  
3 executive personal assistant? What do you  
4 do? And she says I was hired as his  
5 executive personal assistant. I schedule his  
6 appointments.

7 And I'm shocked, and I blurt out:  
8 You seem quite young, how did you get a job?  
9 How old are you? And she says to me, point  
10 blank: I'm 15 years old.

11 And I said to her: You're 15 years  
12 old and you have a position like that? At  
13 that point she just breaks down hysterically,  
14 so I feel like I just said something wrong,  
15 and she will not stop crying. My wife and I  
16 were at a loss for words, and I keep on  
17 trying to console her, and nothing I was  
18 saying, are you all right, do you need a  
19 tissue, do you need water, consoles her.

20 And then in a state of shock, she  
21 just lets it rip, and what she told me was  
22 just unbelievable.

23 Q. What did she say?

24 MR. PAGLIUCA: Object to the form  
25 and foundation.

1 R. Rizzo - Confidential

2 A. She proceeds to tell my wife and I  
3 that, and this is not -- this is blurting  
4 out, not a conversation like I'm having a  
5 casual conversation. That quickly, I was on  
6 an island, I was on the island and there was  
7 Ghislaine, there was Sarah, she said they  
8 asked me for sex, I said no.

9 And she is just rambling, and I'm  
10 like what, and she said -- I asked her, I  
11 said what? And she says yes, I was on the  
12 island, I don't know how I got from the  
13 island to here. Last afternoon or in the  
14 afternoon I was on the island and now I'm  
15 here. And I said do you have a -- this is  
16 not making any sense to me, and I said this  
17 is nuts, do you have a passport, do you have  
18 a phone?

19 And she says no, and she says  
20 Ghislaine took my passport. And I said what,  
21 and she says Sarah took her passport and her  
22 phone and gave it to Ghislaine Maxwell, and  
23 at that point she said that she was  
24 threatened. And I said threatened, she says  
25 yes, I was threatened by Ghislaine not to

1 R. Rizzo - Confidential

2 discuss this.

3 And I'm just shocked. So the  
4 conversation, and she is just rambling on and  
5 on, again, like I said, how she got here, she  
6 doesn't know how she got here. Again, I  
7 asked her, did you contact your parents and  
8 she says no.

9 At that point, she says I'm not  
10 supposed to talk about this. I said, but I  
11 said: How did you get here. I don't  
12 understand. We were totally lost for words.

13 And she said that before she got  
14 there, she was threatened again by Jeffrey  
15 and Ghislaine not to talk about what I had  
16 mentioned earlier, about -- again, the word  
17 she used was sex.

18 Q. And during this time that you're  
19 saying she is rambling, is her demeanor  
20 continues to be what you described it?

21 A. Yes.

22 Q. Was she in fear?

23 A. Yes.

24 MR. PAGLIUCA: Object to the form  
25 and foundation.

1 R. Rizzo - Confidential

2 Q. You could tell?

3 A. Yes.

4 MR. PAGLIUCA: Same objection.

5 A. She was shaking uncontrollably.

6 Q. What happens with this 15-year-old  
7 girl next?

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

10 A. As she is trying to explain, and  
11 I'm asking questions because I'm as feared as  
12 she is at this point. We hear people  
13 approach and she just shuts up.

14 Q. What happens next?

15 A. Eva comes in and tells her that she  
16 will be working for Eva in the city.

17 Q. As what?

18 A. As a nanny.

19 Q. Did you see this girl again?

20 A. Yes.

21 Q. And when?

22 A. On a flight maybe a month or so to  
23 Sweden.

24 Q. What was the purpose of the flight?

25 A. We were going to Sweden for the

1 R. Rizzo - Confidential

2 summer.

3 Q. Who was on the flight?

4 A. The Dubin family.

5 Q. As well as this girl?

6 A. Yes.

7 Q. What happens?

8 A. One thing that I forgot to mention  
9 is during our initial conversation, I asked  
10 her what her name was [REDACTED] she said her name  
11 was [REDACTED].

12 Q. What happened with [REDACTED]?

13 A. We flew to Sweden, we stopped at an  
14 airport that we didn't usually stop at and  
15 she got off the plane.

16 Q. Just so that I make sure I  
17 understand, who it was that she says asked  
18 her for sex on the island, who was that?

19 MR. PAGLIUCA: Object to the form.  
20 Foundation.

21 A. She didn't specify who asked for  
22 sex. She said that they asked for sex.  
23 Immediately after that she put Ghislaine and  
24 Sarah into the conversation.

25 Q. Taking her passport?



1 R. Rizzo - Confidential

2 A. Yes.

3 Q. From -- are there any other  
4 incidents or occurrences that you observed  
5 personally with Jeffrey Epstein and Ghislaine  
6 Maxwell?

7 MR. PAGLIUCA: Object to the form  
8 and foundation.

9 A. Not that I can recall.

10 Q. This last event that you described,  
11 what's the timeframe when that occurred?

12 A. Late 2004, 2005.

13 Q. When did you resign your employment  
14 from the Dubin family?

15 A. I think roughly October.

16 Q. Of what year?

17 A. 2005.

18 Q. Why?

19 A. My wife and I had discussed these  
20 incidents, and this last one was just, we  
21 couldn't deal with it.

22 Q. When you left your employment with  
23 the Dubin family, did you have a job?

24 A. When we finally left, I stayed on  
25 three months after my resignation, I had a

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

June 1, 2016

9:12 a.m.

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

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

1 JOHN ALESSI

2 Q. And where did the massage therapists --  
3 where did they come from?

4 A. Most, they came from Palm Beach. Palm  
5 Beach County.

6 Q. And over the course of that 10-year period  
7 of time while Ms. Maxwell was at the house, do you  
8 have an approximation as to the number of different  
9 females -- females that you were told were massage  
10 therapists that came to the house?

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

13 THE WITNESS: I cannot give you a number,  
14 but I would say probably over 100 in my stay  
15 there.

16 BY MR. EDWARDS:

17 Q. And many of the times would the females  
18 come only one time and not return?

19 MR. PAGLIUSCA: Object to form and  
20 foundation.

21 BY MR. EDWARDS:

22 Q. Let me ask that a different way.

23 Were there times when some of these  
24 females that would come to the house, and you were  
25 told that they were massage therapists, would come

1 JOHN ALESSI

2 MR. PAGLIUSCA: Object to form and  
3 foundation.

4 THE WITNESS: Himself. Himself.

5 BY MR. EDWARDS:

6 Q. And you do not know the ages of the  
7 various massagists, right?

8 A. No.

9 Q. Did you have occasion to clean up after  
10 the massages?

11 A. Yes.

12 Q. Okay. And that is after both a massage  
13 for Jeffrey Epstein, as well as clean up after a  
14 massage that Ghislaine Maxwell may have received?

15 A. Yes.

16 Q. And on occasion, after -- in cleaning up  
17 after a massage of Jeffrey Epstein or Ghislaine  
18 Maxwell, did you have occasion to find vibrators or  
19 sex toys that would be left out?

20 MR. PAGLIUSCA: Object to form and  
21 foundation.

22 THE WITNESS: Yes, I did.

23 BY MR. EDWARDS:

24 Q. Can you describe the types of vibrators or  
25 sex toys that you found left out after a massage

1 JOHN ALESSI

2 that Jeffrey Epstein had just received or Ghislaine  
3 Maxwell had just received?

4 MR. PAGLIUSCA: Object to form and  
5 foundation.

6 THE WITNESS: It was probably two to three  
7 times, I would say. It was not all the time.  
8 I would find things like a dildo, it's called a  
9 double. I hate to say it because these ladies.  
10 But I find these things, put my gloves on, took  
11 it out and rinse it, and put it in  
12 Ms. Maxwell's closet.

13 BY MR. EDWARDS:

14 Q. Why would you put the dildo or sex toy in  
15 Ms. Maxwell's closet?

16 A. Because I knew that's where they were  
17 kept.

18 Q. How did you know that the sex toys were  
19 kept in Ms. Maxwell's closet?

20 A. Because I know where everything was in  
21 that house. Every single room, every single thing,  
22 it was a place, it was placed by me, by the cleaning  
23 lady or my wife. Every -- everything that happened  
24 in that house, I knew it.

25 Q. Who showed you where the dildo or sex toys

1 JOHN ALESSI

2 were kept in the house the first time?

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

5 THE WITNESS: Nobody. Nobody show me.

6 BY MR. EDWARDS:

7 Q. You just saw it?

8 A. I saw it.

9 Q. So you knew where to put it back?

10 A. Yeah. We had to open the closet, clean  
11 the closet, put the clothes in place, put the shoes  
12 in place, put everything in place. So it was a  
13 matter of tidying things up.

14 Q. Did you ever find any costumes?

15 A. I saw one shiny black costume, but I  
16 didn't even know --

17 Q. Where did you see it?

18 A. The same place.

19 Q. In Ms. Maxwell's closet?

20 A. Yes.

21 Q. And where was Ms. Maxwell's closet in the  
22 house?

23 A. In the house? It was in the opposite side  
24 of his bathroom. It was her bathroom in the master  
25 bedroom. It was in the middle. So it was on the

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***LYNN TRUDE MILLER***

*05/24/2016*

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***Agren Blando Court Reporting & Video, Inc.***

*216 16th Street, Suite 600*

*Denver Colorado, 80202*

*303-296-0017*

1           A       Because I wasn't told any different.

2           Q       Do you know where any -- any source of  
3       that information came from? Was it Sky?

4           A       It came from Sky.

5           Q       Okay. And what do you recall him telling  
6       you about when Virginia stopped working at  
7       Mar-a-Lago?

8           A       She was in a discussion with Mrs. Maxwell  
9       to educate her and take her under her wing and be her  
10      new momma. That's what I heard.

11          Q       Okay. And who told you that?

12          A       Sky.

13          Q       Okay. And do you remember when Sky told  
14      you that?

15          A       I don't remember.

16          Q       Okay. Did you learn anything else about  
17      that, other than what you just said?

18          A       No.

19          Q       Okay. Do you know where she went to work  
20      after Mar-a-Lago?

21          A       I think she went with Mrs. Maxwell.

22          Q       But do you know where, physically?

23          A       Physically, Sky and I dropped her off one  
24      day at Mrs. Maxwell's. I did not speak with  
25      Mrs. Maxwell. I didn't have anything to say to her.



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

June 21, 2016

9:17 a.m.

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

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

1 JOSEPH RECAREY - CONFIDENTIAL

2 Ghislane Maxwell?

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

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

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

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

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

23 BY MR. EDWARDS:

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

1 JOSEPH RECAREY - CONFIDENTIAL

2 actually gave massages at Epstein's home?

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

5 BY MR. EDWARDS:

6 Q. Approximately.

7 MR. PAGLIUCA: Same objection.

8 THE WITNESS: I would say approximately  
9 30; 30, 33.

10 BY MR. EDWARDS:

11 Q. And of the 30, 33 or so girls, how many  
12 had massage experience?

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

15 THE WITNESS: I believe two of them may  
16 have been -- two of them.

17 BY MR. EDWARDS:

18 Q. Okay. And as we go through this report,  
19 you may remember the names?

20 A. Correct. Let me correct myself. I  
21 believe only one had.

22 Q. And was that -- was that one of similar  
23 age to the other girls?

24 MR. PAGLIUCA: Object to form and  
25 foundation.

Confidential

Page 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 3, 2016  
9:07 a.m.

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

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

Confidential

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1 DAVID RODGERS

2 flyer person, then you would reduce it to an  
3 initial?

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

6 MR. REINHART: You can answer the  
7 question.

8 You can answer the question, if you can  
9 answer the question. You are allowed to answer  
10 the question, if you understand the question.

11 BY MR. EDWARDS:

12 Q. I'm trying to understand your testimony.

13 Is it, if you came to know that person --

14 A. Uh-huh.

15 Q. -- as a frequent flyer passenger, you  
16 would begin to reduce that person's name to an  
17 initial at some point?

18 MR. PAGLIUCA: Same objection.

19 THE WITNESS: Well, we don't really have a  
20 frequent flyer program that we do, so to speak.  
21 A lot of times I would do it because if you  
22 would write out everybody's name there is not  
23 enough space, you know, to get everybody's name  
24 in that little square there.

25

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1 DAVID RODGERS

2 Q. -- is that right?

3 And is that -- is Ghislaine Maxwell  
4 somebody that through the years 1995 through 2013  
5 was somebody who flew very frequently?

6 A. What were the years again?

7 Q. The years of this book, 1995 --

8 A. I wouldn't say through 2013. But, yes,  
9 '95 through 2000 sometime. Probably, I would have  
10 to go back and -- well, you can see in there.

11 Q. We will get to it.

12 A. There will be a point where you don't see  
13 her much. But to say it went through 2013 would not  
14 be accurate.

15 Q. Let's do it this way: The person that you  
16 have reflected on numerous notations --

17 A. Yes.

18 Q. -- through here as GM --

19 A. Yes.

20 Q. -- just by the initials, are we able to  
21 safely know that that is Ghislaine Maxwell?

22 A. Yes.

23 MR. PAGLIUCA: Object to form and  
24 foundation.

25 MR. EDWARDS: Court reporter, did you get

Confidential

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1 DAVID RODGERS

2 the answer?

3 THE REPORTER: Yes. The answer came  
4 before the objection.

5 BY MR. EDWARDS:

6 Q. So on the next flight, the next day, from  
7 Palm Beach to SAF. Is SAF Santa Fe?

8 A. Yes.

9 Q. And it indicates JE and GM.

10 Are we able to then know that those  
11 passengers on that flight were Jeffrey Epstein and  
12 Ghislaine Maxwell?

13 A. Yes.

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

16 BY MR. EDWARDS:

17 Q. And where would you land at SAF? Is that  
18 an airport?

19 A. It is an airport.

20 Q. Is it a private airport?

21 A. No. It's -- airlines go in there.

22 Q. Did Jeffrey Epstein also have a landing  
23 strip at his property in New Mexico?

24 A. He did at one time.

25 Q. What would that -- do you remember what

Confidential

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1 DAVID RODGERS

2 that code would be?

3 A. I don't believe there was a code.

4 Q. All right. Were there times that you  
5 landed either the Gulfstream or the Boeing --

6 A. No.

7 Q. No.

8 MR. REINHART: Let him finish the question  
9 before you answer.

10 THE WITNESS: Oh, I'm sorry.

11 BY MR. EDWARDS:

12 Q. Sure. We are doing fine so far. But the  
13 court reporter is taking down all of our questions  
14 and all of our answers. We are communicating well.

15 A. Okay.

16 Q. But when I go to read this back, we may  
17 not get that.

18 A. Okay. Go ahead.

19 Q. So were there times where you landed one  
20 of Jeffrey Epstein's planes on his private landing  
21 strip at the New Mexico property?

22 A. Yes. But not the Gulfstream and not the  
23 Boeing.

24 Q. What plane did you land on his property?

25 A. The Cessna 421. And probably a