

EXHIBIT D

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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LEHRMAN, P.L.

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Pursuant to Notice and the Federal Rules
of Civil Procedure, the VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE, called by Defendant, was taken on
Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150
East 10th Avenue, Denver, Colorado, before Kelly A.
Mackereth, Certified Shorthand Reporter, Registered
Professional Reporter, Certified Realtime Reporter
and Notary Public within Colorado.

* * * * *

I N D E X

EXAMINATION	PAGE
MS. MENNINGER	8

PRODUCTION REQUEST(S):
(None.)

APPEARANCES: (Continued)

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Brenda Rodriguez, Paralegal
Nicholas F. Borgia, CLVS Videographer

INDEX OF EXHIBITS

DESCRIPTION	INITIAL REFERENCE
Exhibit 1 Complaint and Demand for Jury Trial re Jane Doe No. 102 v. Jeffrey Epstein	17
Exhibit 2 Jane Doe #3 and Jane Doe #4's Motion Pursuant to Rule 21 for Joinder in Action	21
Exhibit 3 Declaration of Virginia L. Giuffre re Jane Doe #1 and Jane Doe #2 vs. United States of America	23
Exhibit 4 Declaration of Jane Doe 3 re Jane Doe #1 and Jane Doe #2 vs. United States of America	31
Exhibit 5 Declaration of Virginia Giuffre re Bradley J. Edwards and Paul G. Cassell vs. Alan M. Dershowitz	33
Exhibit 6 FBI documentation, date of entry 7/5/13	36
Exhibit 7 Document titled Telecon, Participants Jack Scarola, Brad Edwards, Virginia Roberts. Re Edwards adv. Epstein, 4/7/11, (23 pages of transcription)	39
Exhibit 8 The Billionaire's Playboy Club, By Virginia Roberts	41
Exhibit 9 Plaintiff's Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff re Giuffre v. Maxwell	44

1		INITIAL	
2	DESCRIPTION	REFERENCE	
3	Exhibit 10 Plaintiff's Supplemental	46	
4	Response and Objections to		
5	Defendant's First Set of		
6	Discovery Requests to Plaintiff		
7	Exhibit 11 Undated Declaration of Virginia	46	
8	Giuffre re Plaintiff's		
9	Supplemental Response and		
10	Objections to Defendant's First		
11	Set of Discovery Requests served		
12	on March 22, 2016		
13	Exhibit 12 Plaintiff's Second Amended	47	
14	Supplemental Response and		
15	Objections to Defendant's First		
16	Set of Discovery Requests to		
17	Plaintiff		
18	Exhibit 13 Mrs. Virginia Giuffre resume	67	
19	Exhibit 14 Compilation of e-mails re Open	68	
20	Position - Virginia Giuffre		
21	Exhibit 15 Virginia Lee Roberts passport	180	
22	application		
23	Exhibit 16 Composite of e-mail strings	251	
24	Exhibit 17 Compilation of e-mails between	259	
25	Giuffre and Silva and others		
	Exhibit 18 Compilation of e-mails between	265	
	Virginia Giuffre and Sandra		
	White		
	Exhibit 19 Compilation of e-mails between	269	
	Marianne Strong and Virginia		
	Giuffre		
	Exhibit 20 Compilation of e-mails between	276	
	Virginia Roberts and Jason		
	Richards		

1		INITIAL	
2	DESCRIPTION	REFERENCE	
3	Exhibit 21 Compilation of e-mails between	284	
4	Sharon Churcher and Virginia		
5	Giuffre		
6	Exhibit 22 Compilation of e-mails among	287	
7	Sharon Churcher, Michael Thomas,		
8	Virginia Giuffre and others		
9	Exhibit 23 Compilation of May 2011 e-mails	288	
10	among Sharon Churcher, Virginia		
11	Giuffre, Paulo Silva and others		
12	Exhibit 24 Compilation of June 2011 e-mails	289	
13	between Virginia Giuffre and		
14	Sharon Churcher		
15	Exhibit 26 PR Hub Statement on Behalf of	300	
16	Ghislaina Maxwell article		
17	Exhibit 27 1/2/15 e-mail from Ross Gow to	309	
18	To Whom It May Concern		

1 * * * * *

2 P R O C E E D I N G S

3 THE VIDEOGRAPHER: We're on the record at

4 9 a.m. Today is May 3rd, 2016. This begins the

5 videotaped deposition of Virginia Giuffre in the

6 matter of Virginia L. Giuffre versus Ghislaine

7 Maxwell.

8 We're located at 150 East 10th Street --

9 excuse me, 10th Ave., in Denver, Colorado.

10 Our court reporter is Kelly Mackereth.

11 The videographer is Nicholas F. Borgia, CLVS.

12 Will counsel please introduce yourselves

13 for the record.

14 MR. EDWARDS: Sure. Brad Edwards and

15 Sigrid McCawley on behalf of the plaintiff,

16 Ms. Giuffre.

17 MS. MENNINGER: Laura Menninger and

18 Jeffrey Pagliuca on behalf of the defendant,

19 Ghislaine Maxwell.

20 THE VIDEOGRAPHER: And will our court

21 reporter please swear in the deponent.

22 VIRGINIA GIUFFRE,

23 being first duly sworn in the above cause, was

24 examined and testified as follows:

25 MR. EDWARDS: Just before we get started,

1 I just wanted to make sure that we're clear, and I

2 think that we are, that this deposition in total will

3 be treated as confidential until such time as we are

4 able to review and de-designate.

5 MS. MENNINGER: Yes.

6 MR. EDWARDS: Okay.

7 EXAMINATION

8 BY MS. MENNINGER:

9 **Q Good morning, Ms. Giuffre.**

10 A Good morning, Laura.

11 **Q Can you please state your full name?**

12 A Virginia Lee Giuffre.

13 **Q And where do you live right now,**

14 **Ms. Giuffre?**

15 A [REDACTED]

16 [REDACTED].

17 **Q All right. And who lives with you there?**

18 A My son, my other son, my daughter, my

19 husband and my in-laws.

20 **Q And when did you return to the U.S. for**

21 **this visit?**

22 A I believe it was around Thursday, the

23 29th, I think.

24 **Q Okay. And who traveled with you?**

25 A Myself.

Page 9	Page 11
1 Q Yourself? 2 A Yes. 3 Q Are you able to travel freely between the 4 U.S. and Australia? 5 A Yes. 6 Q Are you married? 7 A Yes. 8 Q To whom? 9 A Robert Giuffre. 10 Q All right. And did Mr. Giuffre travel 11 with you back to the U.S.? 12 A No. 13 Q All right. Have you taken any medications 14 in the last 24 hours? 15 A I have taken -- I have a cold, but I have 16 taken non-drowsy cold tablets and some DayQuil. 17 Q All right. Anything else? 18 A No. 19 Q All right. And what is your current 20 profession, Ms. Giuffre? 21 A I'm a housewife. 22 Q All right. And how long have you been a 23 housewife? 24 A For the last ten years, since I've had 25 kids.	1 under oath? 2 A Yes. 3 Q What does it mean to you? 4 A To tell the truth, the whole truth and 5 nothing but the truth. 6 Q All right. And what does the word truth 7 mean to you? 8 A To be honest. 9 Q Is there more than one truth? 10 A Is there more than -- no, there's no more 11 than one truth. 12 Q If you are confused by a question, you 13 need to let me know that so I can clarify the 14 question, okay? 15 A Okay. 16 Q For example, if I asked you the question 17 were you sexually trafficked to foreign presidents, 18 do you understand what that question means? 19 A Yes. 20 Q What does it mean? 21 A Was I lent out for the purposes of sex to 22 a foreign person -- president. 23 Q All right. And what is the answer to that 24 question? 25 A Yes.
Page 10	Page 12
1 Q All right. And what was your profession 2 in 2014? 3 A A housewife. 4 Q All right. Any other profession? 5 A No. 6 Q All right. You understand that you're 7 under oath today? 8 A Yes. 9 Q And you understand that if you don't 10 understand a question, you need to let me know that. 11 A Okay. 12 Q And ask for clarification. 13 A Um-hum. 14 Q Do you understand? 15 A Yes. 16 Q You also understand, I'm assuming, that 17 you have to say yes or no in answer to a question, or 18 you have to make a verbal response and not just shake 19 your head or something -- 20 A Yes. 21 Q -- so the court reporter can get it. 22 You have -- you have been deposed before, 23 correct? 24 A Yes. 25 Q Do you understand what it means to be	1 Q And if I ask you have you met any foreign 2 presidents, do you understand what that question 3 means? 4 A Yes. 5 Q And what is the answer to that question? 6 A Yes. 7 Q All right. And if I asked you which 8 foreign presidents have you met, do you understand 9 what that question means? 10 A Yes. 11 Q What is the answer to that question? 12 A What is the name of the person? 13 Q Yes. Who are the foreign presidents that 14 you have met? 15 A I honestly can't remember his name at this 16 time. I'm a very visual person so -- 17 Q All right. Can you describe him, then? 18 A Yes. He's Spanish. 19 Q Okay. 20 A Tall, dark hair. 21 Q All right. Anything else? 22 A And he's got a foreign tongue, accent. 23 Q And what age, approximately? 24 A Was I or was he? 25 Q Was he.

Page 13

1 A I'd say in his 40s.

2 **Q Okay. And where did you meet him?**

3 A I believe it was New Mexico.

4 **Q New Mexico?**

5 A Possibly New Mexico. I'm sorry. It's

6 really hard to go back and remember lots of different

7 events with lots of different people.

8 **Q Okay. And is that the only foreign**

9 **president that you have met?**

10 A I've met a lot of very high, powerful

11 people and I wasn't just introduced to them as who

12 they were. It's only going back through photos in

13 time to be able to realize who they are and what they

14 are now. So it's hard for me to distinguish who I've

15 actually met and when and where I've met them.

16 **Q So to your knowledge, you have only met**

17 **one foreign president?**

18 A To my knowledge at this time, yes.

19 **Q And is there anything that might change**

20 **your knowledge at a different time?**

21 A If I were to see more photos of other

22 people. I mean, I've been able to distinguish the

23 majority of the people I've been lent out to, but

24 who's to say there's not more.

25 **Q All right. If I were to ask you the**

Page 14

1 **question how many times have you had sex with Tom**

2 **Pritzker, do you know what that question means?**

3 A I believe so.

4 **Q All right. And what is the answer to that**

5 **question?**

6 A I believe I was with Tom once.

7 **Q Okay. I would like to ask you about your**

8 **prior sworn statement.**

9 **You understand you're under oath today,**

10 **correct?**

11 A Yes.

12 **Q All right. You've previously made**

13 **statements under oath, correct?**

14 A Yes.

15 **Q And you've previously authorized pleadings**

16 **to be filed on your behalf, correct?**

17 A Yes.

18 **Q By various attorneys, right?**

19 A Yes.

20 **Q All right. You have included in your**

21 **sworn statement allegations about my client,**

22 **Ghislaine Maxwell, correct?**

23 A Yes.

24 **Q And did you review any of those prior**

25 **sworn statements before appearing here today?**

Page 15

1 A Yes.

2 **Q And which ones did you review?**

3 A I'd have to see which ones you're

4 specifically talking about. There's quite a lot of

5 statements I've made.

6 **Q Right. And which ones do you recall**

7 **having reviewed before you attended this deposition**

8 **today?**

9 A I've reviewed my affidavit. I'm not a

10 lawyer so I really don't know legal terms to half of

11 the, you know, legal jargon of statements, which they

12 are. If you showed me, I'd be able to tell you if

13 I've seen it or not.

14 **Q Okay. So to your knowledge, can you**

15 **identify any sworn statement you reviewed before**

16 **attending the deposition today?**

17 A Could I name what the statement is?

18 **Q Right.**

19 A The actual piece of paper that has the

20 title at the top?

21 **Q Right.**

22 A No, I don't.

23 **Q Can you describe it in any other fashion?**

24 A I don't understand. I'm sorry.

25 **Q That's all right. You have to tell me if**

Page 16

1 **you don't.**

2 **Do you have any reason to believe that any**

3 **of your previous sworn statements that you have made**

4 **are not true?**

5 A No.

6 MR. EDWARDS: I just object and ask that

7 if we're going to ask the witness questions about any

8 of her statements in whole or in part that the

9 witness be allowed to see the statement, review the

10 statement and then answer your questions.

11 **Q (BY MS. MENNINGER) You may answer the**

12 **question.**

13 A Can you reask the question? I'm sorry.

14 **Q Do you have any reason to believe that any**

15 **of your prior sworn statements are untrue?**

16 A I have no reason to believe that my prior

17 statements are untrue.

18 **Q Has anyone told you to say something that**

19 **was not true in connection with this case?**

20 A No, ma'am.

21 **Q All right. I'd like to start with a**

22 **lawsuit that you filed under the caption Jane Doe**

23 **versus Jeffrey Epstein.**

24 **Do you recall that lawsuit?**

25 A I believe so.

Page 17	Page 19
1 (Exhibit 1 marked.) 2 Q (BY MS. MENNINGER) I'm going to show you 3 an exhibit that we are marking as Defendant's 4 Exhibit 1. 5 MR. EDWARDS: Can I see that for a second? 6 I'd just like to make an objection on the 7 record for the misidentification of this document. 8 While there was a lawsuit filed under the 9 style of Jane Doe versus Jeffrey Epstein, Jane Doe 10 was not Virginia Giuffre. And the lawsuit that's now 11 being handed to this witness is Jane Doe 102 versus 12 Jeffrey Epstein. 13 Is that the document we're talking about? 14 MS. MENNINGER: Counsel, if you have an 15 objection, you should state the basis for your 16 objection in a non-leading, non-suggestive manner. 17 If you have any other record to make, you 18 can do so in a pleading filed with the Court. 19 MR. EDWARDS: Sure. My objection is 20 you've misrepresented what you've handed the witness. 21 I want to make sure that the witness is holding what 22 you actually want her to be holding as opposed to the 23 lawsuit you said that you were going to hand her. 24 That's it. 25 MS. MENNINGER: Counsel, I will ask the	1 Q No. I'm just -- did you find it? 2 A I can see paragraph 23. 3 Q Okay. And do you see that there are 4 allegations about a Ms. Maxwell contained in that 5 complaint? 6 A Yes, I do. 7 Q All right. And do you understand that to 8 be Ghislaine Maxwell, my client? 9 A Yes. 10 Q All right. And Ms. Maxwell was not sued 11 as a part of this case, correct? 12 MR. EDWARDS: Object to the form. 13 THE DEPONENT: Does that mean I can 14 answer? 15 MR. EDWARDS: Sure, you can answer. 16 MS. MENNINGER: Right. 17 MR. EDWARDS: If you understand the 18 question, answer it. 19 A Yes, Ms. Maxwell -- sorry, repeat the 20 question. 21 Q (BY MS. MENNINGER) Was Ms. Maxwell sued 22 in this -- 23 A No, she wasn't. 24 Q -- in the case that's represented by 25 Defendant's Exhibit 1?
Page 18	Page 20
1 witness questions about the document. I did not ask 2 you any questions about the document. 3 Q (BY MS. MENNINGER) Ms. Giuffre, could you 4 please take a look at what we have marked as 5 Defendant's Exhibit 1. 6 Do you recognize that document, 7 Ms. Giuffre? 8 A I believe so. Yes. Yes, I do. 9 Q And do you see that the counsel on the 10 last page -- I'm sorry, not the last page, but the 11 third from the last page are Mr. Josefsberg and 12 Ms. Ezell from Podhurst Orseck? 13 A Yes. 14 Q Were those your lawyers? 15 A Yes, they were. 16 Q And did you authorize them to file Jane 17 Doe 102 versus Epstein on your behalf? 18 A Yes, I did. 19 Q And is that this complaint that's been 20 marked as Defendant's Exhibit 1? 21 A I believe so. 22 Q In that document, if I could ask you to 23 turn to page -- well, I'll turn to page 9 and 24 paragraph 23. 25 A Would you like me to read it?	1 A No, she wasn't. I'm sorry for 2 interrupting you. But no, she was not sued at this 3 time, no. 4 Q And why not? 5 MR. EDWARDS: I'd object and ask the 6 witness not answer that question because that would 7 be privileged, attorney-client privileged, 8 information that was between Ms. Giuffre and the 9 Podhurst Orseck firm at that time. 10 So I'm instructing you not to answer. 11 Q (BY MS. MENNINGER) All right. 12 Ms. Giuffre, did you make a decision yourself whether 13 or not to sue Ms. Maxwell as a part of this lawsuit 14 against -- Jane Doe 102 versus Jeffrey Epstein? 15 A I think I've been advised not to answer 16 that question. 17 Q This is a different question. 18 A Oh, okay. 19 Q So your counsel can assert a privilege, 20 but that question did not call for privileged 21 information. 22 MR. EDWARDS: I -- 23 Q (BY MS. MENNINGER) I'm asking about what 24 -- what you decided to do. Whether you decided to 25 sue Ms. Maxwell or not at the time Jane Doe 102

Page 21

1 **versus Epstein was filed?**

2 MR. EDWARDS: And I disagree. And I
3 object to this invading the attorney-client
4 privilege.

5 And I'm instructing you not to answer.

6 **Q (BY MS. MENNINGER) Can you answer that**
7 **question without revealing any attorney-client**
8 **communications, whether you made a decision to file a**
9 **lawsuit or not?**

10 A I'm going to have to listen to my attorney
11 and not answer the question.

12 **Q All right. I would like to show you some**
13 **documents that were filed in what we'll call the CVRA**
14 **case, the Crime Victims' Rights Act case.**

15 **Do you know what I mean by that reference?**

16 A I am familiar with that.

17 **Q Okay. I'm going to start with one on or**
18 **about December 30th, 2014. We will mark it as**
19 **Defendant's Exhibit 2.**

20 **(Exhibit 2 marked.)**

21 MR. EDWARDS: Thank you.

22 **Q (BY MS. MENNINGER) All right.**
23 **Ms. Giuffre, do you recognize Defendant's Exhibit 2?**

24 A Yes.

25 **Q And what do you understand it to be?**

Page 22

1 A I believe this is when I was hoping to
2 join the CVRA case.

3 **Q All right. And do you know when this**
4 **document was filed?**

5 **And actually, just to be clear, about**
6 **halfway there's actually a second document that was**
7 **filed. So this is a composite exhibit. Let me be**
8 **very clear.**

9 **So after page 14 -- I'm sorry, 13, there's**
10 **a second document that is styled Jane Doe #3 and Jane**
11 **Doe #4's Corrected Motion Pursuant to Rule 21 for**
12 **Joinder In Action.**

13 **Do you see that?**

14 A Did you say page 14?

15 **Q It is on the 14th page of this document.**

16 **Do you see that?**

17 A I do.

18 **Q And so this composite Exhibit 2 has both a**
19 **motion and a corrected motion.**

20 **Do you see that?**

21 A Yes.

22 **Q And were both of those pleadings**
23 **authorized by you to be filed?**

24 A Yes.

25 **Q In other words, you wanted to join the**

Page 23

1 **CVRA action in or about December 30th, 2014, correct?**

2 A I -- I'm not aware of the exact dates.
3 There's no dates on this. But I did try to join the
4 motion, yes.

5 **Q All right. If you can look at the top**
6 **line of the document.**

7 A Yes.

8 **Q Does it say, Entered on FLSD --**

9 A Oh, it does, too, I'm sorry, yes.

10 **Q That's all right. So does that refresh**
11 **your memory as to about when you first sought to join**
12 **the CVRA action?**

13 A Yes.

14 **Q December 30th, 2014, correct?**

15 A Yes.

16 **Q And the corrected motion was filed a few**
17 **days later, correct?**

18 A Yes, correct.

19 **Q If I could turn to Defendant's Exhibit 3,**
20 **which was January 21st.**

21 **(Exhibit 3 marked.)**

22 MR. EDWARDS: Thank you.

23 **Q (BY MS. MENNINGER) Do you recognize this**
24 **document?**

25 A Yes, I do.

Page 24

1 **Q What do you understand this document to**
2 **be?**

3 A It's a rough background of the years that
4 I was abused by Ghislaine and Jeffrey.

5 **Q All right. And this is something I**
6 **believe that you on page 15 signed; is that true?**

7 A Just let me have a look.

8 **Q Sure.**

9 A I think I'm actually missing page 15. Oh,
10 here we go.

11 **Q Sorry. I'm looking at the numbers on the**
12 **top right. I apologize. I believe there was some**
13 **cover page or something that was excluded.**

14 MR. EDWARDS: And just for the record, I'm
15 going to object to the relevance of this document.
16 I'm going to allow the witness to answer the
17 question, but I want my objection on the record.

18 MS. MENNINGER: Okay. Simple objection,
19 relevance.

20 A Are we talking about this page?

21 **Q (BY MS. MENNINGER) Yes, the one with the**
22 **black box, yes. Do you believe that to have**
23 **contained your signature?**

24 A Yes.

25 **Q All right. And you executed that on**

1 **January 19th, 2015?**
 2 A At the very top of the page it says
 3 January 21st, 2015.
 4 **Q The date it was filed. Is there a date**
 5 **just above the signature block?**
 6 A Oh, yes, sorry. Yes, there is.
 7 **Q And what date -- what date was that?**
 8 A The 19th day of January, 2015.
 9 **Q Okay. And this document is something that**
 10 **you believe contains the truth, correct?**
 11 A To the best of my knowledge at the time,
 12 yes.
 13 **Q All right. Did something change between**
 14 **the time then and today that makes you believe that**
 15 **it's not all accurate?**
 16 A Well, as you can see, in line 4 on page 1,
 17 I wasn't aware of my dates. I was just doing the
 18 best to guesstimate when I actually met them.
 19 Since then I've been able to find out that
 20 through my Mar-a-Lago records that it was actually
 21 the summer of 2000, not the summer of 1999.
 22 **Q Oh, I'm sorry. Are you back on page 1?**
 23 A On the first page.
 24 **Q Okay.**
 25 A Yes.

1 **Q And you're talking about line 4?**
 2 A Line 4.
 3 **Q Paragraph 4 or line 4?**
 4 A Oh, sorry. Number 4, the paragraph
 5 number 4.
 6 **Q Okay. And what part of paragraph 4 do you**
 7 **now believe to be untrue?**
 8 A In approximately --
 9 MR. EDWARDS: Object to the form.
 10 You can answer.
 11 A In approximately 1999 when I was 15 years
 12 old I met Ghislaine Maxwell.
 13 **Q (BY MS. MENNINGER) Okay.**
 14 A I now know that it was 2000, that I was 16
 15 years old when I met Ghislaine Maxwell.
 16 **Q So when you signed this document under**
 17 **penalty of perjury stating that it was true, you no**
 18 **longer believe that to be true, correct?**
 19 A It was an honest mistake. We had no idea
 20 how to pinpoint without any kind of records or dates
 21 or anything like that. I was just going back
 22 chronologically through time. And that's the best
 23 time that I thought it was. And now I know the
 24 facts, so it's good to know.
 25 **Q So you now believe that a document you**

1 **filed under oath is no longer true, correct?**
 2 MR. EDWARDS: Object to the form.
 3 A I wouldn't say that it wasn't true. I was
 4 just unaware of the times and the dates.
 5 **Q (BY MS. MENNINGER) Again, is there more**
 6 **than one truth, Ms. Roberts?**
 7 A No, there's no more than one truth.
 8 **Q All right. So a document in which you**
 9 **swore that you were 15 years old when you met**
 10 **Ms. Ghislaine Maxwell is an untrue statement,**
 11 **correct?**
 12 MR. EDWARDS: Object to the form.
 13 A It's not that it's an untrue statement.
 14 It was a mistake. So it wasn't intentionally trying
 15 to say something that wasn't true. It was to my best
 16 knowledge that I thought it was 1999. And when I got
 17 my records from Mar-a-Lago I was able to find out
 18 that it was 2000. And this was entered before I
 19 found out the actual dates that I did work at
 20 Mar-a-Lago.
 21 **Q (BY MS. MENNINGER) Okay. So a document**
 22 **that you filed under oath --**
 23 A Um-hum.
 24 **Q -- is now, you believe to be untrue,**
 25 **correct?**

1 MR. EDWARDS: Objection. Asked and
 2 answered.
 3 **Q (BY MS. MENNINGER) You may answer.**
 4 MR. EDWARDS: Answer again.
 5 A Again, I wouldn't say it's untrue. Untrue
 6 would mean that I would have lied. And I didn't lie.
 7 This was my best knowledge at the time. And I did my
 8 very best to try to pinpoint time periods going back
 9 such a long time ago.
 10 It wasn't until I found the facts that I
 11 worked at Mar-a-Lago in 2000 that I was able to
 12 figure that out.
 13 **Q (BY MS. MENNINGER) And approximately when**
 14 **did you learn those facts about the dates you worked**
 15 **at Mar-a-Lago?**
 16 A I would say it was mid-2015.
 17 **Q Mid-2015 is the first time you became**
 18 **aware of the dates --**
 19 A I don't know the exact --
 20 **Q If you could just let me finish.**
 21 A I'm sorry.
 22 **Q That's all right. Approximately mid-2015**
 23 **when you learned the true dates that you had worked**
 24 **at Mar-a-Lago?**
 25 A That's correct. Sorry.

Page 29	Page 31
1 Q And based on the fact that you learned the 2 fact you had worked at Mar-a-Lago in 2000 -- you 3 became aware in mid-2015 -- 4 A Um-hum. 5 Q -- that you had met Ms. Maxwell in 2000, 6 correct? 7 A That's -- 8 MR. EDWARDS: Object to the form. 9 A That's correct. 10 Q (BY MS. MENNINGER) All right. And you 11 became aware in mid-2015 that you were not 15 years 12 old when you met Ghislaine Maxwell, correct? 13 MR. EDWARDS: Object to the form. 14 A That's correct. 15 Q (BY MS. MENNINGER) Okay. And who 16 provided you those Mar-a-Lago records in 17 approximately mid-2015? 18 MR. EDWARDS: I'm going to object. 19 And to the extent that this invades the 20 attorney-client privilege, if it was your attorneys 21 that you spoke to and learned this information or 22 received this information from, then you're 23 instructed not to answer. 24 A I cannot answer that question. 25 Q (BY MS. MENNINGER) Did you yourself look	1 Q (BY MS. MENNINGER) I'm going to show you 2 an exhibit filed on, I believe on or about 3 February 6th of 2015. Defendant's Exhibit 4. 4 (Exhibit 4 marked.) 5 MR. EDWARDS: Thank you. 6 Q (BY MS. MENNINGER) And drawing your 7 attention to the heading line that says, Entered on 8 the docket February 6th, 2015. 9 Do you see that? 10 A Yes. 11 Q All right. And Declaration of Jane Doe 3, 12 do you see that on the first page? 13 A Yes. 14 Q And it's in the CVRA case, correct, Jane 15 Doe 1 and Jane Doe 2 versus United States of America? 16 A Yes. 17 Q All right. And do you recognize this 18 document? 19 A Yes. 20 Q And what do you understand this document 21 to be? 22 A I believe it's more reason to why I should 23 have been added to the CVRA case. 24 MR. EDWARDS: Objection to the relevance, 25 Counsel.
Page 30	Page 32
1 at records in the middle of 2015 regardless of who 2 showed them to you? 3 MR. EDWARDS: Objection. And to the 4 extent that they were showed to you or shared by any 5 of your lawyers, you're instructed not to answer the 6 question. It invades the attorney-client privilege. 7 Q (BY MS. MENNINGER) Did you look at 8 Mar-a-Lago records in the middle of 2015 yourself? 9 MR. EDWARDS: She's not answering the 10 question. 11 MS. MENNINGER: On what grounds is she not 12 answering the question? 13 MR. EDWARDS: I just told you it invades 14 the attorney-client privilege. If she learned -- 15 I will instruct her if she learned by some 16 other way than her attorneys sharing the information 17 with her, then she can answer the question. 18 Q (BY MS. MENNINGER) I'm asking you not to 19 tell me whether your attorneys showed you the record. 20 I'm asking you not to tell me the source of the 21 record. 22 I'm asking you if you personally in the 23 middle of 2015 looked at Mar-a-Lago records? 24 MR. EDWARDS: Same objection. 25 Same instruction.	1 Q (BY MS. MENNINGER) Okay. And again, if 2 you look to the last page of the document, 3 paragraph 67 -- 4 A The last page? 5 Q Yes, the very last. 6 A 67, yes. 7 Q All right. It says in paragraph 67: I 8 declare under penalty of perjury that the foregoing 9 is true and correct, right? 10 A Yes. 11 Q And it was executed on or about the 12 5th day of February, 2015, correct? 13 A It's a bit smudged, but it kind of looks 14 like a 5. 15 Q All right. And then there's a signature 16 block that's redacted that says Jane Doe 3, correct? 17 A Correct. 18 Q Do you believe that you signed this 19 document and it was later covered up by that block? 20 A Yes. 21 Q All right. And again, is there anything 22 in this document that you believe today to not be 23 true? 24 MR. EDWARDS: I just ask that you read 25 through the entire document and answer the question.

Page 33 1 Q (BY MS. MENNINGER) Have you seen this 2 document before, Ms. Giuffre? 3 A I'm sure I have, but it's always good to 4 refresh your memory just looking over something. 5 Q All right. 6 (Pause.) 7 A Thank you for giving me time to read that 8 over. 9 Q Certainly. So have you had a chance to 10 read it now? 11 A Yes. 12 Q All right. And what parts of this 13 document sworn by you under penalty of perjury are 14 not true? 15 A Again, the only thing that I see is the 16 mistake that I made, I first met Epstein when I was 17 15 years old. 18 Q Okay. And that's in paragraph 5? 19 A That's in paragraph 5 on the first page. 20 Q All right. And everything else you 21 believe to be true? 22 A Yes. 23 Q Okay. If I could now turn to what I'll 24 mark as Defendant's Exhibit 5. 25 (Exhibit 5 marked.)	Page 35 1 against Mr. Dershowitz; is that your understanding? 2 It's your understanding. You don't have 3 to look at your lawyer if you don't understand. You 4 don't have to -- 5 A No, I just don't know if I'm allowed -- 6 Q That's all right. 7 A -- to say certain things about that. But, 8 yes, I believe they were in a lawsuit. 9 Q Okay. And that's against Mr. Dershowitz, 10 right? 11 A Correct. 12 MR. EDWARDS: Object to the form. I 13 object to the relevance of the document. 14 Q (BY MS. MENNINGER) All right. 15 Ms. Giuffre, again, if you could turn to the last 16 page of this document. And do you see a signature on 17 that page? 18 A I do. 19 Q Whose signature is that? 20 A That is mine. 21 Q And approximately when did you sign that 22 document? 23 A Executed this 20th day of November, 2015. 24 Q All right. So you signed that on 25 November 20th, 2015, correct?
Page 34 1 THE DEPONENT: Thank you. 2 MR. EDWARDS: Thank you. 3 MS. MENNINGER: I think I have one more. 4 MS. McCAWLEY: It's okay if you don't. 5 MS. MENNINGER: I don't think I have all 6 of them. 7 Q (BY MS. MENNINGER) All right. Do you 8 recognize Defendant's Exhibit 5? 9 A Yes. 10 Q What is the title of that document? 11 A Declaration of Virginia Giuffre. 12 Q And that's you, correct? 13 A Yes. 14 Q And do you recognize which case this 15 declaration was filed in? 16 A Yes. Bradley Edwards and Paul Cassell, 17 Plaintiff versus Alan Dershowitz, Defendant. 18 Q All right. And who do you understand 19 Mr. Edwards and Mr. Cassell to be? 20 A Mr. Edwards is my lawyer sitting next to 21 me. 22 Q All right. 23 A And Mr. Cassell is another one of my 24 lawyers. 25 Q All right. And they are in a lawsuit	Page 36 1 A Correct. 2 Q All right. And that was under penalty of 3 perjury, correct? 4 A Correct. 5 Q All right. If I could now turn to what 6 we'll mark as Defendant's Exhibit 6. 7 (Exhibit 6 marked.) 8 MR. EDWARDS: Thank you. 9 MS. McCAWLEY: Thanks. 10 Q (BY MS. MENNINGER) Do you recognize this 11 document, Ms. Giuffre? 12 A I do. 13 Q All right. What do you believe this 14 document to be? 15 A I believe this is when I spoke to the FBI. 16 Q Okay. And do you remember about when you 17 spoke to the FBI? 18 A It says, Date of entry July 5th, 2013. 19 Q Do you believe that you spoke to the FBI 20 in 2013? 21 A I thought it was 2011 when I talked to 22 them. 23 Q Okay. I'm going to direct your attention 24 to the bottom of that page. 25 A Yes.

Page 37

1 **Q The first page. Do you see that?**
 2 A Yes.
 3 **Q The last few lines there have another**
 4 **date.**
 5 A Oh, yes, investigation of, yes.
 6 **Q All right.**
 7 A So that makes sense, okay.
 8 **Q Okay. What do you understand that to be?**
 9 **And if it refreshes your recollection about when you**
 10 **spoke to the FBI, just let us know.**
 11 A Yeah, March 17th, 2011 sounds more right
 12 than 2013.
 13 **Q Okay. And where did you speak to them?**
 14 A I believe this was in the office of the
 15 consulate, American Consulate, in Sydney.
 16 **Q Sydney, Australia?**
 17 A Sydney, Australia.
 18 **Q Okay. And you were there in person with**
 19 **these FBI agents?**
 20 A Correct.
 21 **Q And were they taking notes when they spoke**
 22 **to you?**
 23 A Yes.
 24 **Q Were they recording the interview, to your**
 25 **knowledge?**

Page 38

1 A I believe they were.
 2 **Q Okay. Have you had a chance to review**
 3 **this report?**
 4 **And I will make note for the record that**
 5 **there are obviously many places that are blacked**
 6 **out --**
 7 A Yeah.
 8 **Q -- or whited out. Is that fair?**
 9 A Yes.
 10 **Q All right. Have you had a chance to**
 11 **review this one with whited-out portions of it before**
 12 **today?**
 13 A Yes.
 14 **Q All right. And you understood when you**
 15 **were speaking to the FBI that they were federal**
 16 **agents, correct?**
 17 A Yes.
 18 **Q And that you were supposed to tell them**
 19 **the truth, correct?**
 20 A Absolutely.
 21 **Q And do you believe that you did, in fact,**
 22 **tell them the truth?**
 23 A To the best of my knowledge. Again, when
 24 it comes to dates and times, I was obviously off.
 25 But everything else is absolutely 100 percent true.

Page 39

1 **Q Okay. And have you reviewed any -- have**
 2 **you at any time reviewed this document without those**
 3 **portions whited out?**
 4 A I don't believe I've seen this document
 5 without the portions.
 6 **Q Okay. So you don't know, for example,**
 7 **what's behind those, other than what you recall --**
 8 A No.
 9 **Q -- having told the FBI at the time,**
 10 **correct?**
 11 A That's correct.
 12 **Q Okay. I'm going to show you a new**
 13 **document.**
 14 A Okay.
 15 **Q You can just put that to the side.**
 16 **Defendant's Exhibit 7.**
 17 **(Exhibit 7 marked.)**
 18 **Q (BY MS. MENNINGER) All right.**
 19 **MR. EDWARDS: Thanks.**
 20 **Q (BY MS. MENNINGER) And do you recognize**
 21 **this document?**
 22 A Yes.
 23 **Q And what do you understand it to be?**
 24 A This was a phone conversation that I had
 25 between Jack Scarola and Brad Edwards.

Page 40

1 **Q Okay. And do you see a date reflected on**
 2 **the front page?**
 3 A April 7, 2011.
 4 **Q Is that when you had that phone**
 5 **conversation with them?**
 6 A If it's dated like that, it must be, yes.
 7 **Q Well, I just need you to say from your**
 8 **memory, does that sound about right in terms of what**
 9 **you recall having been the phone conversation?**
 10 A I'm sure it's correct.
 11 **Q Okay.**
 12 A I don't have a good calendar in my brain.
 13 So, yes, I'm sure that that's the correct date.
 14 **Q Did you understand it was being recorded,**
 15 **correct?**
 16 A Yes.
 17 **Q Okay. Have you listened to the recording**
 18 **of that phone call?**
 19 A I don't believe I listened to the
 20 recording, but I have seen the document.
 21 **Q All right. And again, you were speaking**
 22 **the truth at the time you were speaking to them as**
 23 **lawyers and officers of the court, correct?**
 24 A Yes. And again, to the best of my
 25 knowledge when it comes to dates.

Q Okay. And then the last -- the last document, I hope, is --

MS. MENNINGER: The big one.
(Exhibit 8 marked.)

Q (BY MS. MENNINGER) All right. Do you recognize -- I'm going to -- I'm sorry, if I didn't say it already. This is Defendant's Exhibit 8. Do you recognize this document?

A Yes, I do.

Q And what is this document?

A This is a manuscript that I was writing, I believe, back in 2011 regarding some of my life story. And just to make it known, this is a based on true events. But I wouldn't say fictional, but just based on true events.

Not everything in it is -- not everything is in there and not everything is, you know, correct. So there's a few mistakes in there.

Q Okay. Off the top of your head, do you recall any mistakes that are in there now without reading the 140-page document?

MR. EDWARDS: We're going to be here a long time.

A Yeah, we could be here a very long time. I mean, I'd like to say a majority of it is correct.

Some names have been changed in order to protect other people.

Q (BY MS. MENNINGER) Protect their privacy?

A Protect their privacy, yeah, I would say, just not getting them involved in, if this were to ever go public.

Q Well, again, without rereading the whole manuscript --

A Reading it, yeah. I'm trying to see if I can -- see something in here.

Q Let me narrow my question and maybe that will help.

A Yes.

Q Is there anything -- well, first of all, did you author that entire manuscript?

A Yes, I did.

Q Did anyone else author part of that manuscript?

A Do you mean did anyone else write this with me?

Q Right.

A No.

Q That's all your writing?

A This is my writing.

Q Okay. To the best of your recollection,

as you sit here right now, is there anything in that manuscript about Ghislaine Maxwell that is untrue?

A I don't believe so. Like I said, there is a lot of stuff that I actually have left out of here.

Q Um-hum.

A So there is a lot more information I could put in there. But as far as Ghislaine Maxwell goes, I would like to say that there is 99.9 percent of it would be to the correct knowledge.

Q All right. Is there anything that you -- and I understand you're doing this from memory. Is there anything that you recall, as you're sitting here today, about Ghislaine Maxwell that is contained in that manuscript, that is not true?

A You know, I haven't read this in a very long time. I don't believe that there's anything in here about Ghislaine Maxwell that is not true.

MR. EDWARDS: I'd just ask, Counsel, if you have anything specific to show her about Ghislaine Maxwell --

MS. MENNINGER: I'll ask questions.

MR. EDWARDS: -- I'll have her look at it.

MS. MENNINGER: I'll ask questions.

MR. EDWARDS: I know, but I want the record clear that if she hasn't read it in a long

time, she --

MS. MENNINGER: She made the record very clear. Thank you. She doesn't need you to make a record.

MR. EDWARDS: I'm not making records, but you're making this last longer. There's no need for this. This doesn't have to be an unpleasant process. I want her to help you.

MS. MENNINGER: I don't find it unpleasant. I'm sorry if you do.

MR. EDWARDS: Okay. Well, then, I object to that last series of questions to the extent that she was unable to look at what you wanted her to look at.

Q (BY MS. MENNINGER) I would like to next turn to a document filed on March 16th of this year. Or actually, let me rephrase that. A document dated March 16th of this year, which we will mark as Defendant's Exhibit 9.

(Exhibit 9 marked.)

Q (BY MS. MENNINGER) Do you recognize this document, Ms. Giuffre?

A Yes, I do.

Q All right. And what is your understanding of what this document represents?

1 A Based upon the title, it is Plaintiff's
2 Response and Objections to Defendant's First Set of
3 Discovery Requests to Plaintiff.
4 **Q And are you the plaintiff?**
5 A I am the plaintiff, yes.
6 **Q All right. So it's your response to**
7 **Ms. Maxwell's discovery request, correct?**
8 A Correct.
9 **Q All right. And if you look at the last**
10 **page -- or, I'm sorry, it would be the second to last**
11 **page -- you might see signatures of your attorney,**
12 **correct?**
13 A I see printed names.
14 **Q Printed. Electronic signature --**
15 A Okay.
16 **Q -- will have a little S in front of it.**
17 A All right.
18 **Q Do you see that?**
19 A I can see the, yeah the printed names. So
20 if it's electronic signature, then yes.
21 **Q All right. And the date on that is**
22 **March 16th of 2016?**
23 A Correct.
24 **Q All right. And so without revealing the**
25 **content of your conversations, you assisted in**

1 **preparing responses to discovery requests, correct?**
2 A Yes.
3 **Q All right. I'm going to show you a**
4 **subsequent one marked Defendant's Exhibit 10 and**
5 **dated March 22nd.**
6 **(Exhibit 10 marked.)**
7 **Q (BY MS. MENNINGER) If you can take a look**
8 **at that.**
9 A Thank you.
10 **Q And while we're at it, I'm going to give**
11 **you Defendant's Exhibit 11 so you can look at them**
12 **together.**
13 **(Exhibit 11 marked.)**
14 **Q (BY MS. MENNINGER) All right.**
15 A Thank you.
16 **Q All right. So looking at Defendant's**
17 **Exhibit 10, do you recognize that document?**
18 A Plaintiff's Supplemental Response and
19 Objections to Defendant's First Set of Discovery
20 Requests to Plaintiff.
21 I've seen a lot of documents, and they all
22 look the same. But I'm sure I've seen it.
23 **Q All right. And looking, again, at the**
24 **last page -- or I'm sorry, this time it will be the**
25 **third to last page.**

1 **Do you see your attorney's signature and**
2 **the date, March 22nd, 2016, correct?**
3 A I do.
4 **Q All right. And then looking at**
5 **Defendant's Exhibit 11, that's your declaration,**
6 **correct?**
7 A Yes, it is.
8 **Q And declaring under penalty of perjury as**
9 **of March 22nd, 2016 that the supplemental response**
10 **and objections are true and correct, right?**
11 A Correct.
12 **Q And you -- that's your signature?**
13 A That is mine.
14 **Q And you are swearing under penalty of**
15 **perjury that Defendant's Exhibit 10 is true and**
16 **correct?**
17 A Yes.
18 **Q As of March 22nd, 2016, right?**
19 A Yes.
20 **Q All right. And then one more on that.**
21 **Defendant's Exhibit 12.**
22 **(Exhibit 12 marked.)**
23 **Q (BY MS. MENNINGER) And do you recognize**
24 **this document?**
25 A Yes.

1 **Q Okay. And what is this document?**
2 A Plaintiff's Second Amended Supplemental
3 Response and Objections to Defendant's First Set of
4 Discovery Requests to Plaintiff.
5 **Q All right. And again, turning to the very**
6 **rear section, I think you'll see your attorney's**
7 **signatures again and the date of April 29th, 2016?**
8 A I do see that.
9 **Q All right. And again, you authorized this**
10 **document to be filed, correct?**
11 A Correct.
12 **Q And the statements contained therein are**
13 **true, to the best of your knowledge, correct?**
14 A Correct.
15 **Q And that's -- April 29th is just a few**
16 **days ago, correct?**
17 A Yes.
18 **Q All right. Did you review this April 29th**
19 **document before it was filed or served?**
20 A Like I said, I've seen a lot of documents
21 and they all look alike, but I'm sure I've seen this
22 one.
23 **Q Okay. And if it's something that was**
24 **served last Friday, does that refresh your**
25 **recollection that you reviewed it before it was**

1 **served on April 29th, 2016?**
2 A I believe I have seen this.
3 **Q And you were here in the U.S. last Friday?**
4 A Yes.
5 **Q So you saw it in person, correct?**
6 A Yes, I was looking at a lot of documents
7 on Friday.
8 **Q Okay.**
9 A I believe this could definitely be one I
10 looked at.
11 **Q All right. If I could direct your**
12 **attention to -- let me see, in that document --**
13 MR. EDWARDS: Exhibit 12?
14 MS. MENNINGER: Um-hum, Defendant's
15 Exhibit 12.
16 **Q (BY MS. MENNINGER) -- to page -- sorry.**
17 **You're not the only one who's seen a lot of**
18 **documents.**
19 **Well, without asking you to look at a**
20 **page, can you tell me what your -- between 1996**
21 **and -- well, in 1996 to 2002, what was the first job**
22 **that you held?**
23 A I believe the first job that I held was in
24 the year 2000, and that was at Mar-a-Lago.
25 **Q Okay. And is that the first job you held**

1 **as a teenager or at any point in time, that you**
2 **recall?**
3 A Yes, that I recall.
4 **Q All right. Did you ever work at Taco**
5 **Bell?**
6 A My ex-boyfriend used to work there and I
7 would help him out. I was never really -- I don't
8 think I was employed there. He was my boyfriend so I
9 stayed there with him all the time.
10 **Q What was his name?**
11 A I called him Michael, but I think his real
12 name was James.
13 **Q Okay. And so he was employed there, but**
14 **you were not employed there?**
15 A I used to go there and help him out.
16 **Q Did you have a uniform?**
17 A I would have to wear a shirt when I was
18 there, yes. He was the manager, so --
19 **Q Oh, a Taco Bell shirt?**
20 A Yes.
21 **Q Okay. And did you get a paycheck from**
22 **them?**
23 A I believe Michael paid me.
24 **Q How did he pay you?**
25 A With a check.

1 **Q Written from Taco Bell?**
2 A You know, I don't know, sorry. I just --
3 I remember he asked me to come in and help him out,
4 and that's -- I didn't really consider myself an
5 employee there, but --
6 **Q Just wearing the shirt and getting a**
7 **paycheck didn't cause you to think you were an**
8 **employee?**
9 A Well --
10 MR. EDWARDS: Object to the form.
11 Mischaracterizes her testimony.
12 A Yeah, I know. I mean, it was my
13 boyfriend. I was helping him out. So that's the way
14 I looked at it.
15 **Q (BY MS. MENNINGER) Is there any other**
16 **place that you wore a uniform and got a check from in**
17 **the years from '96 to 2000?**
18 A I did work at Publix as a bag girl, but
19 that was only for a couple weeks, I think.
20 **Q Which Publix was that?**
21 A I believe it was in Loxahatchee.
22 **Q Okay. Do you remember the street?**
23 A No.
24 **Q All right. Anywhere else you wore a**
25 **uniform and got a paycheck?**

1 A I volunteered at a bird aviary.
2 **Q What was the name of that?**
3 A I don't know the name of it. But it
4 was -- I'm an animal lover. So --
5 **Q Okay.**
6 A -- it's something I enjoyed doing.
7 **Q Okay. Did you get a check from them?**
8 A I volunteered. I think they eventually
9 put me on some kind of payroll. I don't think it was
10 much, though.
11 **Q Okay. So what year were you in helping**
12 **out in a Taco Bell wearing the uniform and getting a**
13 **check?**
14 A I have no idea when it comes to years.
15 **Q Was it before or after Mar-a-Lago?**
16 A Before Mar-a-Lago.
17 **Q Okay. And how --**
18 A Mar-a-Lago was my first real job so --
19 **Q What's that?**
20 A Mar-a-Lago was like my first real job.
21 **Q What do you mean by real job?**
22 A Like, you know, fully employed, sit down
23 for an interview and, you know.
24 **Q Okay. So Taco Bell, was Taco Bell the**
25 **first place you got a paycheck from?**

1 MR. EDWARDS: Object to the form.
 2 A Uhm, I don't know, to be honest.
 3 **Q (BY MS. MENNINGER) And in what order did**
 4 **Taco Bell, Publix and Mar-a-Lago go, and the aviary,**
 5 **sorry?**
 6 A Oh, I would have to guess. Do you want me
 7 to guess?
 8 **Q Sure.**
 9 A Um, I would say Publix. And then, I think
 10 that's when I helped my boyfriend out at Taco Bell
 11 and then I think the aviary.
 12 **Q And where was the Taco Bell?**
 13 A I was living in Fort Lauder -- I think it
 14 was Fort Lauderdale. Don't quote me on that, but
 15 somewhere in Florida, Broward County, something like
 16 that.
 17 **Q And who were you living with at that time?**
 18 A Michael. His name is James, but Michael.
 19 **Q So you were living with Michael when you**
 20 **worked at the Taco Bell, right?**
 21 A Yes, I was living with him.
 22 **Q And you worked with Michael when you**
 23 **worked at the Publix, correct?**
 24 A No.
 25 **Q Okay. So Publix came after Taco Bell or**

1 **before?**
 2 A I think it came -- like I said, don't
 3 quote me on it, but I think Publix came before it.
 4 **Q And who were you living with when you**
 5 **worked at Publix?**
 6 A My mom and my dad.
 7 **Q And who were you living with when you**
 8 **worked at the aviary?**
 9 A My mom and my dad.
 10 **Q Anywhere else that you got a paycheck from**
 11 **before 2000?**
 12 A No, not that I can think of.
 13 **Q Okay. Anywhere else you wore a uniform?**
 14 A Besides Mar-a-Lago and -- yeah, that's it.
 15 **Q Okay. And so how long was it between**
 16 **working at any of those three places and the time**
 17 **that you worked at Mar-a-Lago?**
 18 A I have no idea. I'm sorry. Um --
 19 **Q Years? Months?**
 20 A Oh, we're going to go back
 21 chronologically. I was trying to get my GED and I --
 22 there was a summer break. And that's when I started
 23 working for Mar-a-Lago. So that Mar-a-Lago we know
 24 now is in the year 2000. So I would have to say a
 25 month.

1 **Q Months. And what was the job you believe**
 2 **you had immediately prior to Mar-a-Lago?**
 3 A If I were correct, it would be the aviary
 4 that I volunteered at.
 5 **Q Okay. And you believe you were living**
 6 **with your parents at the time you worked at the**
 7 **aviary?**
 8 A Yes.
 9 **Q Okay. And not living with Michael?**
 10 A Michael might have been living with me and
 11 my parents.
 12 **Q Okay. So you recall Michael was living**
 13 **with you and your parents at the time you worked at**
 14 **the aviary?**
 15 A Yes.
 16 MS. McCAWLEY: Objection.
 17 Mischaracterizes testimony.
 18 **Q (BY MS. MENNINGER) And was Michael living**
 19 **with you and your parents at the time you started at**
 20 **Mar-a-Lago?**
 21 A Yes.
 22 **Q And what address was Michael living with**
 23 **you and your parents at the time you started at**
 24 **Mar-a-Lago?**
 25 A My parents' address?

1 **Q Whatever address you were living at, at**
 2 **the time you started at Mar-a-Lago.**
 3 A [REDACTED], Loxahatchee, Florida
 4 33470.
 5 **Q How is it that you came to work at**
 6 **Mar-a-Lago?**
 7 A My dad is a maintenance manager or
 8 supervisor, I don't know what you call it. But he
 9 worked in the maintenance department, mostly on
 10 tennis courts, working on the air conditioning,
 11 helping set up for functions. And he got me a summer
 12 job there.
 13 **Q Okay. And you said you were on a break?**
 14 A Yes.
 15 **Q What were you on a break from?**
 16 A I think like -- this is going back so long
 17 now, but I was attempting to get my GED. And it,
 18 summer came, so school stops during the summertime
 19 here in America, and I got a summer job.
 20 **Q All right. And where were you in school?**
 21 A I don't actually know the name of the
 22 place. It's -- yeah, I know.
 23 **Q A GED place?**
 24 A Yeah, it was, like, I was previously in
 25 Royal Palm Beach High School, but, I mean, because of

1 a lot of the circumstances that I had been subjected
 2 to, I decided I wanted to get my GED.
 3 **Q Okay. So you were going to an actual**
 4 **school to get your GED, that's what you're saying?**
 5 A Yes.
 6 **Q And that school, whatever it was, where**
 7 **you were getting your GED was not Palm Beach High**
 8 **School, right?**
 9 A No.
 10 **Q And it -- whatever the school was where**
 11 **you were getting your GED took a summer break?**
 12 A I believe so, yes.
 13 **Q And that was in 2000?**
 14 A Now that we know the right dates, yes.
 15 **Q And that's when your dad helped you get a**
 16 **quote-unquote summer job?**
 17 A Yes.
 18 **Q All right. And that summer job was**
 19 **Mar-a-Lago?**
 20 A Yes.
 21 **Q Okay. Now tell me how you sort of came**
 22 **into Mar-a-Lago for the first time? He asked you to**
 23 **come? They called you? What happened?**
 24 A My dad was very liked there. So I think
 25 he talked to the people who were in HR. And then

1 they said for me to come in for an interview.
 2 **Q Um-hum.**
 3 A To be interviewed for a locker room
 4 assistant.
 5 **Q Um-hum.**
 6 A They liked me. I had to go through a
 7 series of drug tests, polygraph tests. I mean, it
 8 was a very extensive regime to get a job there.
 9 **Q Yeah.**
 10 A And when all those came back good, I
 11 started the job.
 12 **Q So how long do you think it took for you**
 13 **to go through that extensive series of drug tests and**
 14 **polygraph tests and --**
 15 A I did them both in the same day.
 16 **Q Okay. When was the interview? Was it on**
 17 **the same day or a different day?**
 18 A I believe it was like a few days
 19 beforehand.
 20 **Q Okay. And do you remember who you**
 21 **interviewed with?**
 22 A No.
 23 **Q Do you remember the title of the job for**
 24 **which you were interviewing?**
 25 A Locker room attendant.

1 **Q Locker room attendant was the name?**
 2 A Of the position?
 3 **Q Yes.**
 4 A Yes.
 5 **Q And did they give you any training?**
 6 A No.
 7 **Q Did they show you how to work the lockers?**
 8 A Well, I mean, there was a girl who already
 9 worked there at the front desk. I think she helped
 10 make appointments and greeted people, and then she
 11 just told me my duties in the locker room were to,
 12 you know, make tea. I had never made tea before, so
 13 that was -- that was fun. Learn how to make tea.
 14 Clean up after the ladies who had been in the locker
 15 room. Make sure the bathrooms were kept nice and
 16 tidy. You fold the toilet paper into a little
 17 triangle every time anyone went to the toilet. Clean
 18 up the sink area. It was a very crazy job.
 19 **Q Do you remember the names of any of your**
 20 **coworkers who you worked with at Mar-a-Lago?**
 21 A I believe the head of the spa area was
 22 Adriana or Adrienne. I can't remember exactly.
 23 **Q Okay.**
 24 A And the girl who trained me, I have a very
 25 clear picture of her face, but I can't remember her

1 name.
 2 **Q All right. What did she look like?**
 3 A She had blonde hair, probably to her
 4 shoulders, and it was curly.
 5 **Q And how old was she?**
 6 A I'd say in her 20s.
 7 **Q All right. Did they check your**
 8 **identification when you went in for your job**
 9 **interview or your --**
 10 A It was very extensive. I'm sure they
 11 would have had to check and make sure I was who I
 12 was.
 13 **Q And so you had a driver's license, right?**
 14 A I believe so.
 15 **Q All right. And, let's see. Did you move**
 16 **to a different position while you were there or did**
 17 **you always stay as a locker room --**
 18 A I wasn't there very long. So I just --
 19 **Q Just one second. Did you always stay as a**
 20 **locker room attendant?**
 21 A Yes.
 22 **Q Okay. I just need to finish my question**
 23 **for the court reporter.**
 24 A I know, I'm sorry. I have a tendency of
 25 jumping in.

Page 61

Q Okay. If I can direct your attention back to Defendant's Exhibit 12 at page 15. And under the heading Response to Interrogatory Number 9, do you see that where it says --

A Yes.

Q -- Ms. Joffrey (pronouncing) -- Giuffre, excuse me, responds as follows?

A Yes.

Q Okay. It says you worked as a locker room attendant for the spa area, correct?

A Yes.

Q And it says records produced in this case identify the date of employment as 2000, correct?

A Yes.

Q What records that were produced in this case cause you to believe that the employment began in 2000?

A Uhm, is this going back to another question that I'm not allowed to answer?

Q No.

A I have seen the documents, and I know that my employment now was in 2000.

Q What documents did you see that caused you to make that answer?

A The Mar-a-Lago employment documents.

Page 62

Q Are they your Mar-a-Lago employment documents?

A Um --

MR. EDWARDS: Object to the form.

A My name is on there.

Q (BY MS. MENNINGER) Okay. Do you believe them to be your Mar-a-Lago employment documents?

A As far as I can tell.

Q Okay. So you were able to review your Mar-a-Lago employment documents --

MR. EDWARDS: Object to the form.

Q (BY MS. MENNINGER) -- and respond to the question, as it says right there that you respond, correct?

A Yes.

Q When did you review the documents that you reviewed to cause you to respond to that answer that way?

A I don't think I found out till sometime mid -- mid last year, I believe.

Q Okay.

A I'm really not too sure. You know, I'm sorry, dates and documents, there's too many to remember. But --

Q Okay. You do admit that you filed in many

Page 63

documents that you met Ghislaine Maxwell in '98 or '99, correct?

A Yes.

Q And you do admit that you told members of the media that you met Ghislaine Maxwell in '98 or '99, correct?

MR. EDWARDS: Form.

A That was my closest approximation to what I could actually remember, so --

Q (BY MS. MENNINGER) You told the media that you met her in '98 or '99?

MR. EDWARDS: Form.

A Again, yes, as close as I can remember.

Q (BY MS. MENNINGER) And the media published in the newspapers that you met Ghislaine Maxwell in '98 or '99, correct?

MR. EDWARDS: Form.

A Yes, they did.

Q (BY MS. MENNINGER) And the news media published in the newspapers what you told them, which is that you were 15 when you met Ghislaine Maxwell, correct?

MR. EDWARDS: Form.

A Which is what I truly thought at the time, yes.

Page 64

Q (BY MS. MENNINGER) Okay. And it is not true that you were 15 when you met Ghislaine Maxwell, correct?

A It was a mistake that I made, yes.

Q So that the printing in the newspaper that you met Ghislaine Maxwell when she was -- when you were 15 is not a true statement of fact, correct?

A It is an incorrect statement as I have now found out, that my employment started in 2000.

Q All right. And to the best of your recollection, you found that out in the middle of 2015, correct?

MS. McCAWLEY: Objection.

A To the best of my recollection. I mean, I can't pinpoint an exact date I found out. But, yes.

Q (BY MS. MENNINGER) About a year ago?

MR. PAGLIUCA: Are we all participating in this deposition or just --

MS. McCAWLEY: Same way you guys did.

MR. PAGLIUCA: We did not.

MS. MENNINGER: I did not.

MS. McCAWLEY: You both objected.

MS. MENNINGER: No.

MR. PAGLIUCA: No, we didn't.

MS. McCAWLEY: We can go back through the

1 record.
 2 MR. PAGLIUCA: We sure can.
 3 So if we're all participating, maybe I'll
 4 have a few questions at the end of this. I think we
 5 should limit this to one lawyer. And your statement
 6 about two lawyers participating in the last
 7 deposition is wrong.
 8 MS. McCAWLEY: Well, I recall that she got
 9 a microphone because she said she was going to be
 10 objecting. So --
 11 MR. PAGLIUCA: I know. She put on a
 12 microphone and didn't speak through the whole thing.
 13 MS. McCAWLEY: Well, we can take a look
 14 back at the record. You know, it's not a problem.
 15 Brad can make the objections.
 16 MR. PAGLIUCA: Okay. Let's take care of
 17 it that way, then.
 18 MR. EDWARDS: Can you tell me when you're
 19 at a good stopping point?
 20 MS. MENNINGER: I was about to say it's
 21 been an hour.
 22 MR. EDWARDS: Yeah.
 23 MS. MENNINGER: So this would be a good
 24 time to take a break.
 25 MR. EDWARDS: Okay. Thanks.

1 THE VIDEOGRAPHER: We're off the record at
 2 10:12.
 3 (Recess taken from 10:12 a.m. to
 4 10:27 a.m.)
 5 THE VIDEOGRAPHER: We're back on the
 6 record at 10:27.
 7 **Q (BY MS. MENNINGER) All right.**
 8 **Ms. Giuffre, you testified that you first became**
 9 **aware that you -- your employment at Mar-a-Lago began**
 10 **in 2000, in mid-2015, correct?**
 11 MR. EDWARDS: Object to the form.
 12 Mischaracterizes her testimony.
 13 A I don't know exactly when. It could be
 14 towards the end of 2015. It could be towards the
 15 beginning of 2016. I just know that I've learned
 16 about it recently. I'm not too sure exactly what
 17 date I did learn about it.
 18 **Q (BY MS. MENNINGER) Okay. But to your**
 19 **mind, it's been within the last 6 to 12 months; is**
 20 **that fair?**
 21 A I wouldn't say 12 months, no. I would
 22 just say up until -- I don't know when I was shown
 23 that, when I actually first saw it, but it wasn't a
 24 year ago.
 25 **Q Saw your employment records from**

1 **Mar-a-Lago?**
 2 A Correct.
 3 **Q Okay. I'm going to show you an exhibit**
 4 **marked as Defendant's Exhibit 13.**
 5 **(Exhibit 13 marked.)**
 6 **Q (BY MS. MENNINGER) Okay. All right,**
 7 **Ms. Giuffre, do you recognize this document?**
 8 A Yes, I do.
 9 **Q What is this document?**
 10 A This is a resume that I created myself.
 11 **Q All right. And what address did you put**
 12 **at the top of your resume?**
 13 A [REDACTED]
 14 [REDACTED]
 15 **Q And when did you live at that address?**
 16 A I believe from 2013 to 2014.
 17 **Q Okay. And you said you created this**
 18 **document, correct?**
 19 A Yes.
 20 **Q And did you send it out to any employers?**
 21 A Do you have any attachments that this goes
 22 with to say that I have? Because I'm not too sure.
 23 I've created a lot of resumes.
 24 **Q Okay. And hold on, I'll see if we do.**
 25 MS. MENNINGER: All right. I'll mark this

1 next as Defendant's Exhibit 14.
 2 (Exhibit 14 marked.)
 3 A Thank you.
 4 **Q (BY MS. MENNINGER) All right. Do you**
 5 **recognize this document?**
 6 A Yes.
 7 **Q What is this document?**
 8 A This is me replying to ads for jobs.
 9 **Q Okay. And you were communicating with --**
 10 **by your e-mail, correct?**
 11 A Yes.
 12 **Q All right. And I apologize. This one**
 13 **actually has the resume attached to an e-mail.**
 14 A Um-hum.
 15 **Q Do you see that, towards the back of the**
 16 **document?**
 17 A Yes, I do.
 18 **Q Okay. So --**
 19 A Sorry.
 20 **Q To whom -- to whom -- with whom were you**
 21 **communicating about a job at this time?**
 22 A Well, on the very top, Phil or Gary, and
 23 that was for a bartending position.
 24 **Q Okay.**
 25 A Um --

Q Was that something your brother had recommended or your father? I don't know who.

A You know, I just looked at that, that's kind of why I giggled. I don't know why my brother -- that's my brother. That's the way we talk to each other: Hi, stupid head. Good luck, smelly, XOXOXO, sissie.

He's my little brother so you have to understand we kind of play around. But subject to my resume for hospitality, I'm not too sure why he would have gotten it, but apparently he did.

Q Okay. And you see that your resume was attached to an e-mail communication you had with your brother?

A Yes, I do.

Q Right. And that's also your brother was part of the e-mail chain with respect to an ad placed on craigslist for a position, correct?

A He was on -- let me just check the dates, then.

Q Sure.

A 1/20/2014, 1/21, so just within a day of each other, yes.

Q All right. And then the resume that's attached is the address you were living at in

January --

A Yes.

Q -- of 2014, correct?

A Correct.

Q All right. So you believe you created the resume that's attached to Defendant's Exhibit 14, correct?

A Correct.

Q And you sent it out with respect to this employment you saw on craigslist, correct?

A Correct.

Q And you are the one who put into this document the contents of the resume, right?

A Yes.

Q All right.

MR. EDWARDS: We're talking about the resume that's attached to Exhibit 14, right?

MS. MENNINGER: We are.

MR. EDWARDS: Okay. Got it.

MS. MENNINGER: Thank you for clarifying.

MR. EDWARDS: Got it.

MS. MENNINGER: Although, I don't know there are any differences with Defendant's Exhibit 13.

Q (BY MS. MENNINGER) But just to be safe,

you believe the one attached to Defendant's Exhibit 14 is the one that you sent?

A There are differences, isn't there? Yes, there is.

Q Okay. What are the differences that you know?

A It starts -- I mean, let me see. The very top introduction is the same.

Q Um-hum.

A After the experience.

Q Um-hum.

A That changes. The dates change. And then underneath Employment Training Recruitment is Indigo Bar & Grill on Exhibit 14. On Exhibit 13 it's Mannway Logistics underneath Employment Training Recruitment.

And then underneath Mannway Logistics on Exhibit 13 is Mar-a-Lago Resort and Spa. And on Exhibit 14 is Gemma Catering/Wedding Receptions. So there is quite a few differences.

Q Okay. Great. Do you have any idea when you sent out Defendant's Exhibit 13, or if you did, to an employer?

A Unless you have something that's attached to it, I can't be sure that I did.

Q Okay. Is the content in Defendant's Exhibit 14, that you believe you sent out to an employer, correct?

A Unfortunately, I have to tell you that they are not correct. Through my experience I was in the mind-set that I was unemployable. I had been abused for many years and I was told by a job agency that I need to show that I've consistently worked at various places and given experience. So it's not something that I'm proud of, but I have had to plump up my resumes to make it look as though I could be employed.

Q What do you mean by plump up your resume?

A Well, I couldn't -- I didn't feel that I could go to an employer and tell them that I had held, you know, one job in the last 10 to 12 years and before that I was trafficked for the purpose of sex. And that's definitely something you don't want to put down on your resume, which makes you quite highly unemployable.

So I did add places in, such as Indigo Bar & Grill, Calmao Flamenco Bar & Restaurant.

Q Wait, wait. Which one?

A On Exhibit 14.

Q Um-hum.

1 A Underneath Experience, the dates are all
2 incorrect, as well. It's just to show that I was
3 consistently working, which I was not. And I needed
4 a job to help my family. I've got a family of five.
5 So like I said, it's not something proud that I had
6 to do, but I felt it was the only way that I could
7 actually get employed.

8 **Q You lied on your resume?**

9 A I made it look as though I had
10 continuously worked throughout the years so that way
11 an employer would see me as a potential candidate.

12 **Q Okay. Well, let's start with Employment**
13 **Training and Recruitment, ET Australia.**

14 **Did you work at that place of employment?**

15 A I did work there.

16 **Q What dates did you actually work there?**

17 A I know I finished working for -- we call
18 it ET Australia, so if you don't mind me abbreviating
19 it.

20 **Q However you want.**

21 A I know I finished there in January of 2006
22 right before my son was born, my first son was born.
23 And I believe I worked there for a year, I believe
24 so. It might have been a little bit over a year, but
25 just around a year.

1 **Q All right. So you worked at a place for**
2 **about a year. And on your resume you typed that you**
3 **worked there for nine years, correct?**

4 A Correct.

5 **Q And you did that, correct?**

6 A I did.

7 **Q Nobody else typed that for you?**

8 A No, I did it myself.

9 **Q All right. And the next employment you**
10 **list here -- well, is your job description accurate?**

11 A Yes, that is actually accurate.

12 **Q Okay. And everything in there is what you**
13 **actually did?**

14 A Yes, for ET Australia.

15 **Q Okay. Indigo Bar & Grill, did you type**
16 **that in?**

17 A I did type that in.

18 **Q And did you actually work at Indigo Bar &**
19 **Grill?**

20 A No, I did not.

21 **Q All right. So the dates that you put on**
22 **your resume are not true, correct?**

23 A That's correct.

24 **Q The title of your job at that place was**
25 **not correct; you didn't work there, right?**

1 A I never worked there.

2 **Q The description that you typed out about**
3 **the things that you did at that Indigo Bar & Grill is**
4 **made up, correct?**

5 A Well, it's -- it's generally what you
6 would do if you were a server or a waitress. But,
7 like I said, I did not work at Indigo Bar & Grill.

8 **Q So when you represented to an employer**
9 **that you were applying for a job that you had done**
10 **these things, you had not actually done these things**
11 **at Indigo Bar & Grill, correct?**

12 A Not at Indigo Bar & Grill, no.

13 **Q All right. Can you read the first**
14 **sentence of your job description?**

15 A For Indigo Bar & Grill?

16 **Q Right.**

17 A At this restaurant located inside of an
18 RSL, we were never slow.

19 **Q Okay. So when you said, "We were never**
20 **slow," you just made that up, correct?**

21 MR. EDWARDS: Form.

22 A I tried to give as much information to my
23 potential employer to show that I could handle a
24 large amount of pressure and guests. So, yes, I put
25 that in there.

1 **Q (BY MS. MENNINGER) But you represented**
2 **you were there working as a server or waitress and**
3 **that we were never slow. That is not true, correct?**

4 A Well, I never worked there, so it's --
5 again, I was very highly unemployable, given my past.
6 So I did whatever I could to make it look as though
7 my potential employer could hire me.

8 **Q Okay. You described your duties that were**
9 **not -- those were fictional duties, correct?**

10 A They were duties that a waitress and a
11 server would do.

12 **Q But you did not do at Indigo Bar --**

13 A But I did not do them at Indigo Bar &
14 Grill.

15 **Q Okay. You described your energetic**
16 **service and your service with a smile to the guests.**
17 **That was not true, correct?**

18 A Everything in Indigo Bar & Grill is not
19 correct.

20 **Q And you created that entire description,**
21 **correct?**

22 A For the sole purpose of being able to
23 obtain employment, yes.

24 **Q To get money?**

25 MR. EDWARDS: Form.

1 A To make a wage for my family.

2 **Q (BY MS. MENNINGER) All right. The next**

3 **job, Gemma Catering and Wedding Receptions, did it --**

4 **is that a job that you actually held?**

5 A I did actually work there. I don't know

6 the dates, but I was a server, waitress and

7 bartender.

8 **Q March of 2003 to April 2004, is that about**

9 **when you worked there?**

10 A It could be very close to it. I'm not too

11 sure.

12 **Q You're not sure?**

13 A No, I'm not sure.

14 **Q Did you have children -- had you already**

15 **had children at the time you worked there?**

16 A No, I do not believe I did. I became a

17 stay-at-home mom when I had my first child.

18 **Q And what year was that?**

19 A 2006.

20 **Q Okay. So you believe you worked at Gemma**

21 **Catering and Wedding Receptions before 2006?**

22 A I believe so.

23 **Q And other than that, you can't recall what**

24 **dates you worked there?**

25 A I'm sorry, I couldn't help, no.

1 **Q All right. And then what were your**

2 **actual -- is that your actual job that you had there?**

3 A The description of it?

4 **Q The title, server, waitress, bartender?**

5 A Yes.

6 **Q All right. Is the description accurate?**

7 A To a T.

8 **Q What's that?**

9 A To a T.

10 **Q Okay. The next job you list is Mannway**

11 **Logistics, Logistics Receptionist.**

12 **Is that a job you actually held?**

13 A It is a job I held.

14 **Q And when did you hold it?**

15 A Again, I'm very bad at dates. I'm not too

16 sure.

17 **Q All right. Approximately when did you**

18 **have it?**

19 A I don't want to speculate and give you the

20 wrong answer, so I'm not too sure.

21 **Q Did you have children at the time you**

22 **worked there?**

23 A No.

24 **Q So before 2006?**

25 A Yes.

1 **Q And after you moved to Australia, which**

2 **was what year?**

3 A I moved to Australia at the end of 2002, I

4 believe.

5 **Q All right. Do you recall going to work**

6 **shortly after you got to Australia?**

7 A Yes.

8 **Q How --**

9 A I had to obtain my -- my ability to work

10 there. So I think that took a couple months. You

11 can get a temporary visa that allows you to work

12 while you're waiting for your permanent resident

13 status, and that's what we did.

14 **Q All right. Were you able to apply for**

15 **that temporary job permission before you actually got**

16 **married in Australia?**

17 A I got married in Aus -- we were married in

18 Thailand, really, but we made it official in January

19 of 2003. And within a couple of weeks, I was granted

20 the permission to work in Australia legally.

21 **Q Okay. So to the best of your**

22 **recollection, you got permission to work in Australia**

23 **sometime in the spring of 2003?**

24 MR. EDWARDS: Form.

25 A That's actually summer over there.

1 **Q (BY MS. MENNINGER) Fair enough. The**

2 **first quarter of the year, calendar year --**

3 A Yes.

4 **Q -- 2003?**

5 A If we're going to be politically correct,

6 yes.

7 **Q That's what you recall?**

8 A (Indicating.)

9 I'm sorry, yes.

10 **Q And is your description of Mannway**

11 **Logistics correct?**

12 A Yes.

13 **Q All right. And how long did you work**

14 **there?**

15 A I think that was less than a year that I

16 worked there. I would approximate about six, seven

17 months.

18 **Q Can you name one coworker you had or boss**

19 **or anybody else that worked there?**

20 A I know her name started with an M, but I

21 can't remember. I remember what she looks like. I

22 just don't remember her name.

23 **Q Okay. And how much did you make there?**

24 A I don't remember the exact amount.

25 Approximately about \$20 an hour, I think.

1 **Q And how many hours per week were you**
2 **working for that six months to a year?**
3 A I believe that was full time.
4 **Q And is full time the same in Australia?**
5 A Yeah it's a 40-hour week.
6 **Q Okay.**
7 A Well, 38 because you get two hours of
8 lunch, so, yes.
9 **Q All right. Have you been in touch with**
10 **anyone from that employment in a while?**
11 A No.
12 **Q All right. The next job listed there is**
13 **what?**
14 A Calmao Flamenco Bar & Restaurant.
15 **Q Is that someplace you actually worked?**
16 A No, it's not.
17 **Q Is that a place that actually exists?**
18 A I don't really know.
19 **Q All right.**
20 A I mean, I think I looked on the Internet
21 and found something similar to what the description I
22 was needing to fill, and that was it.
23 **Q Okay. So when you were creating this**
24 **document in 2013/2014, right, that's when you had the**
25 **Titusville address?**

1 A Yes.
2 **Q All right. You went on the Internet and**
3 **you searched for a place that would be like the job**
4 **you were looking for?**
5 A Correct.
6 **Q And you found the name of an actual place,**
7 **Calmao Flamenco Bar & Restaurant.**
8 **Did I get that right?**
9 A I'm not 100 percent on that, but I think
10 so.
11 **Q Okay. And you did that in order to**
12 **impress the employer you were applying for here in**
13 **the e-mail, correct?**
14 A Correct.
15 **Q All right. And you did that in order to**
16 **get money from a job that you hoped to get from this**
17 **employer in the e-mail, correct?**
18 A I was hoping to gain employment. And not
19 having much experience, I put in there that I had
20 experience.
21 **Q Okay. And you said that you had been**
22 **advised to plump up your resume by a job agency; is**
23 **that right?**
24 A Yes.
25 **Q What was the name of that job agency?**

1 A Before I worked at ET Australia, I was
2 actually a job seeker there. And a job seeker, I
3 don't know if you're familiar with the term.
4 Somebody who is looking for work and you
5 go to a job agency, and you go look on the computer.
6 And you actually have somebody who helps you find
7 employment. And they are the ones who recommend that
8 you show that you've continuously worked throughout
9 your years. They ended up really liking me, so
10 that's how I got the job there.
11 **Q Okay. Was it a particular person there**
12 **that gave you the advice to plump up your resume?**
13 A It would have been one of the counselors.
14 **Q Which one?**
15 A I don't know.
16 **Q Okay. Do you remember the names of any of**
17 **the counselors?**
18 A I only remember the name of one of the
19 girls I worked with, but I don't remember -- I don't
20 remember anyone else's name.
21 **Q When did you first become a job seeker at**
22 **ET Australia?**
23 A Well, if I finished there in 2006 and I
24 worked there for approximately a year, it would have
25 been 2005 -- late 2004, 2005. I'm not too sure.

1 **Q Okay. So you were a job seeker there**
2 **first and then got employment there, right?**
3 A Yes.
4 **Q Okay. So the advice to plump up your**
5 **resume was while you were seeking a job or while you**
6 **were employed there?**
7 A While I was seeking a job.
8 **Q All right. And you were assigned a**
9 **counselor?**
10 A Yes.
11 **Q One or more than one?**
12 A It changes on a daily basis. There's
13 somebody who comes into the office and they sit with
14 you and they help you with your resume. And then
15 they help you go on the computer and look for open
16 vacancies.
17 **Q So someone in approximately 2005 gave you**
18 **the advice to plump up your resume. That's what**
19 **you're saying?**
20 A To make it look like I've continuously
21 worked, yes.
22 **Q Okay. So back to Calmao Flamenco Bar &**
23 **Restaurant, which is a place you found on the**
24 **Internet but did not actually work. Is that, the**
25 **dates for your employment there, December 2001 to**

February 2003, not true, correct?

A Obviously, yes. At that time I was -- during 2001 I was with Jeffrey and Ghislaine being trafficked.

Q Um-hum. So you were not working at Calmao Flamenco Bar --

A Obviously not, yes.

Q And you said you got to Australia in late '02 and did not work there between late '02 and February of '03, correct?

A I've never worked at Calmao Flamenco Bar & Grill, period.

Q All right. And the job description that you crafted there is also fictional, correct?

A Yes.

Q All right. And Mar-a-Lago Resort and Spa you put down as a place you had worked, correct?

A Correct.

Q And you typed in August 2000 to September 2001, correct?

A Correct.

Q And you created your job description there, correct?

A Correct.

Q All right. And then turning to the last

page you have your education, correct?

A Can I just make a statement to say that, again, with the Mar-a-Lago Resort and Spa, I did have to add dates to make it look as though I had continuously worked. So those, again, are incorrect dates.

Q But it is a date that you typed into a resume in 2013 or 2014 --

A That is the date that --

Q If you could just let me finish my question.

A Sure.

Q That is a date that you typed into your resume in 2013 or 2014, correct?

A That is the date that I did type in, but those are incorrect dates.

Q All right.

A And, as well as the -- the position, organizing, making and canceling appointments for massage therapists.

Q All right.

A I mean, I was their locker room attendant. I just wanted it to sound like I had more receptionist experience than I did.

Q You wanted it to look like you had more

experience than you had had, correct; that's what you just said?

A Correct, I mean given that my past had not enabled me to be able to look for work or I wasn't able to put down what I actually had -- had to do in my past. So I made it look as though I was able to be employed.

Q You did not have the past that you thought the employer was looking for, right?

A I couldn't put down on there that I was sex trafficked for a couple years and did not have the experience to be able to apply for jobs and provide for my family.

So this is something that I said. Again, I am not proud of, but I felt was necessary to do to be able to gain employment.

Q All right. So you were applying for a job at a restaurant, right?

A At this -- according to the front e-mail, yes.

Q All right. And you did not put down Taco Bell on this resume, correct?

A No. The only jobs on here are the ones that we have mentioned.

Q Right. And so why did you choose August

of 2000 as your start date for Mar-a-Lago?

A It just looks as though I've given them a longstanding history of employment.

Q You chose a month. Why did you choose that month?

A I chose months and dates for every single position on that resume. There is no specific reason why I chose that month. It was just purely to show that I was continuously employed.

Q On the last page it has some education. Which part of that is untrue?

MR. EDWARDS: Object to the form.

A I have received my business admin cert 3 from ET Australia. I've never held responsible service of alcohol and gambling.

Q (BY MS. MENNINGER) Do you understand that to be a licensing of some sort or a class? Or what do you understand that --

A In Australia you have to have something called an RSA and RCG to be able to work as a waitress or bartender or anything. And I didn't know if it was the same out here in America. So I put down that I had.

I had taken a CPR and first aid. I don't remember when, but it's not current.

1 And I did go to Royal Palm Beach High
2 School and I didn't put down a degree there or
3 anything.

4 **Q So is it fair to say you never worked as a**
5 **waitress in Australia. Is that what you just said?**

6 A I did work as a waitress at Gemma
7 Catering.

8 **Q Oh, okay.**

9 A I don't believe I needed my RSA to work
10 there. I'm not too sure.

11 **Q All right. And if I could just ask you**
12 **one other question about Gemma Catering. In the last**
13 **line of the job description it says: This job was a**
14 **second job. I would work in the evenings and**
15 **weekends for saving extra cash.**

16 **What was it a second job to?**

17 A If my time period is right, it would be my
18 second job to Mannway Logistics because they were
19 both -- Gemma Catering and Mannway Logistics were
20 both in Sydney, whereas ET Australia was on the
21 central coast.

22 **Q All right. ET Australia is on the central**
23 **coast?**

24 A Correct.

25 **Q And Gemma and Mannway are in Sydney?**

1 A In Sydney, yeah.

2 **Q All right. Got it.**

3 **Do you know if those two organizations**
4 **still exist?**

5 A Mannway, I would definitely say, it's a --
6 it's a large logistic company. I would say it still
7 does exist.

8 Gemma Catering, I'm not too sure if that
9 exists anymore or not.

10 **Q Okay. All right. So did you spend your**
11 **16th birthday with Ghislaine Maxwell and Jeffrey**
12 **Epstein?**

13 A No. I was 16 when I met them, now that I
14 know the correct dates. So I would have spent my
15 17th birthday with them.

16 **Q So when you represented that you spent**
17 **your 16th birthday with Ghislaine Maxwell and Jeffrey**
18 **Epstein, that was not true, correct?**

19 A At my ability at the time, that's what I
20 believed to be true. It wasn't until I found the
21 Mar-a-Lago records stating the year 2000. Me being
22 born in 1983 would make me turning 17 that year.

23 **Q So please describe for me your 17th**
24 **birthday that you claim you spent with Ghislaine**
25 **Maxwell and Jeffrey Epstein.**

1 A I remember spending a birthday with them
2 on Jeffrey Epstein's island called Little Saint
3 Jeff's. I wouldn't say it was a party. It was just
4 Ghislaine, me, Jeffrey. I believe Emery Taylor was
5 there. I got some presents from them.

6 **Q What presents did you get?**

7 A Ghislaine gave me a whole bunch of makeup,
8 like boxes of different kinds of eye shadows and
9 lipsticks and just makeup altogether.

10 Jeffrey gave me a bracelet and, I think
11 earrings.

12 **Q What kind of earrings?**

13 A They were what I believed to be diamonds.
14 I don't know what they exactly were. I think Jeffrey
15 was talking about, they could have been passed off as
16 good knock-offs. But they appeared to be diamonds.

17 **Q Any other presents?**

18 A I remember the makeup and the jewelry. I
19 don't remember much else.

20 **Q And that was your 17th birthday, you said?**

21 MR. EDWARDS: Form.

22 A It's hard for me to really pinpoint
23 exactly which birthday it was.

24 **Q (BY MS. MENNINGER) So it could have been**
25 **your 18th or your 19th?**

1 A I don't want to lock down on which exact
2 birthday it could have been without knowing.

3 **Q You don't know which birthday it was; is**
4 **that what you're saying?**

5 A The one that I'm specifically telling you
6 about?

7 **Q Right. You don't know which one?**

8 A No.

9 **Q All right. Do you remember spending more**
10 **than one birthday with Jeffrey Epstein and Ghislaine**
11 **Maxwell?**

12 A Yes.

13 **Q Okay. Tell me about the other ones that**
14 **you remember.**

15 A Well, I know my 19th birthday. I can't
16 remember, really, my 18th birthday. But my 19th
17 birthday we celebrated it early, earlier than my
18 actual date of birth. And that's when he surprised
19 me with tickets to Thailand.

20 **Q What do you mean he surprised you with**
21 **tickets to Thailand?**

22 A He told me that the tickets for Thailand
23 were for my birthday.

24 **Q Did he hand you something that looked like**
25 **a ticket to Thailand? What do you mean?**

1 A He didn't hand me the tickets at that
2 time, but he told me that he had booked me in for
3 massage training at an institute in Chiang Mai.

4 **Q And he told you he had booked you tickets**
5 **to a massage training in Chiang Mai, Thailand**
6 **sometime before your actual 19th birthday?**

7 MR. EDWARDS: Form.

8 **Q (BY MS. MENNINGER) Did I get that right?**

9 A Yes.

10 **Q Okay. Did he hand you --**

11 A Excuse me.

12 **Q -- hand you anything at that time?**

13 A No, I don't think so.

14 **Q And where were you located when he told**
15 **you this about the Thailand massage training?**

16 A Jeffrey, Ghislaine and I had just gone
17 scuba -- not scuba diving, not with the big tanks,
18 but snorkeling with just the mask and the two-piece,
19 and on Jeffrey's island, by the way.

20 And we had gone out for a while. And we
21 had come back. And he's got a pier where it's got a
22 ladder and you climb up. And we were wearing wet
23 suits. So we were taking off our flippers and our
24 wet suits and all of our gear.

25 And they said they wanted to sit down and

1 talk to me, just the three of us. And he -- first,
2 he told me about the --

3 **Q If I could just stop you. I think I asked**
4 **where were you --**

5 A Oh, I'm sorry.

6 **Q -- when you had this conversation about**
7 **the --**

8 A Just the island. I'm just trying to
9 describe the instance that he gave it to me.

10 **Q Oh, okay.**

11 A It was on the island, on the pier in the
12 Caribbean.

13 **Q Okay. And it was sometime before your**
14 **19th birthday?**

15 A Correct.

16 **Q How much time before?**

17 A I don't know. A couple -- six weeks, a
18 couple of months. I don't know. Close to my
19 birthday. It was my birthday present, that's what he
20 told me.

21 **Q Okay. So you don't know when you had this**
22 **conversation?**

23 MR. EDWARDS: Form.

24 A I mean, I -- no, I didn't record the time
25 and the date, so I can only speculate. It was

1 shortly before my birthday, but not my birthday.

2 **Q (BY MS. MENNINGER) Okay. And he told you**
3 **he had booked you tickets to go to Thailand, right?**

4 A Correct.

5 **Q All right. So you remember one birthday**
6 **at which you received makeup, bracelet and earrings**
7 **and one birthday at which you received tickets to**
8 **Thailand.**

9 **Do you remember any other birthdays that**
10 **you spent with Jeffrey Epstein and/or Ghislaine**
11 **Maxwell?**

12 A I'm sure there is, but I honestly can't
13 remember what I did for my 18th birthday.

14 **Q Okay. Well, I'm sorry, did you know for**
15 **sure that the bracelet, earrings and makeup were from**
16 **your 17th birthday, or do you know?**

17 A I don't know.

18 **Q But you know they were not for your**
19 **16th birthday, right?**

20 A Correct.

21 **Q All right. If I could have you go back to**
22 **Defendant's Exhibit 1, I think.**

23 A Defendant's, sorry, Exhibit 1?

24 **Q Um-hum. Page 9, either at the bottom or**
25 **in the upper right-hand corner.**

1 **Do you see that page?**

2 A Page 9 of 27, yes.

3 **Q All right. And paragraph 23, do you see**
4 **that paragraph?**

5 A I see the paragraph.

6 **Q All right.**

7 A I was just going to read it over quickly.

8 **Q By all means.**

9 A I've read it.

10 **Q And the sentence, Defendant and**
11 **Ms. Maxwell acknowledged and celebrated plaintiff's**
12 **16th birthday, is not a true statement, correct?**

13 A Only upon learning about the fact that I
14 just found out my records. I assumed at the time it
15 was my 16th birthday. But now we know different.

16 **Q You admit, as you sit here today, that**
17 **defendant and Ms. Maxwell did not celebrate your 16th**
18 **birthday with you, correct?**

19 A Correct, based upon the records.

20 **Q Which you don't know when you saw?**

21 A I know it was, you know, it wasn't -- it
22 wasn't a year ago, but it wasn't that long ago
23 either. So I'm not too sure. I can't tell you the
24 date that I actually saw them.

25 **Q All right. Last year you lived in**

Colorado for part of the year, correct?

A For part of the year, yes.

Q And then you moved to Australia, correct?

A Yes.

Q You did not live in Florida at any point in time during 2015, correct?

A I believe I left Titusville at the end of 2014.

Q Okay. So you did not live in Florida during 2015, correct?

A I believe so.

Q All right. So when you reviewed these records sometime in 2015 that caused you to know the real date of when you worked at Mar-a-Lago, where were you physically located?

MR. EDWARDS: Object to the form and mischaracterized her testimony.

A I don't remember where I saw these records, when I saw these records. I know it wasn't a year ago. I know it was more recent. I can't pinpoint the date that I actually saw them, but I recently, I believe -- I don't know. I don't want to sit here and speculate and then give you the wrong answer. It's just new knowledge for me.

Q (BY MS. MENNINGER) All right. Did you

receive the records by e-mail?

A I believe so.

Q Okay. Did you use any e-mail address other than [REDACTED]

A No.

Q That's the only e-mail address that you've used?

A That's correct.

Q And the Mar-a-Lago records that you reviewed you received by e-mail at that e-mail address?

A Possibly. I mean, I can't say 100 percent. I could have been told about them. I could have seen them on a piece of paper. I really don't know. This is a very hazy subject. All I know is that I found out and that was able to clarify a lot of dates for us.

Q Okay. What other dates were clarified?

MR. EDWARDS: I object and instruct the witness not to answer if any of your knowledge is based on any privileged communication that you had between yourself and any of your lawyers.

Q (BY MS. MENNINGER) Okay. You just said you reviewed records yourself, correct?

MR. EDWARDS: Object. That

mischaracterized her testimony. She actually just testified that she may have heard that.

MS. MENNINGER: No, you're not testifying.

I've asked her --

MR. EDWARDS: I'm clearing the record up right now, though.

MS. MENNINGER: You can object based on form. That's a valid objection. You've made your record.

Q (BY MS. MENNINGER) Did you review records that clarified dates for you?

A I've either reviewed them or I've been told about -- I can't remember. I'm sorry. I know -- I know now that the dates are what they are, but I don't remember.

Q You don't know when you learned that the dates are what they are?

A No, I don't.

Q And your best guess is what?

MR. EDWARDS: Objection.

If any of your answer is based on attorney-client privilege, I'm instructing you not to answer.

A I can't answer, then.

Q (BY MS. MENNINGER) Okay. So have your

attorneys told you to change your dates?

MR. EDWARDS: Objection.

Do not answer that question. This is a question intentionally devised to invade the attorney-client privilege.

She's not going to answer those questions.

Q (BY MS. MENNINGER) You can answer a question about whether your attorneys had told you to lie. Because that would be a crime, and I'm sure --

A I will --

Q -- I'm sure you want to tell me that your attorneys did not tell you to lie, correct?

A I can tell you for a fact my attorneys have never told me to lie.

Q All right. And did your attorneys tell you to change a date?

MR. EDWARDS: Objection. She's not answering any questions about communications between her lawyers and herself, period.

Q (BY MS. MENNINGER) So if I could also direct your attention to Defendant's Exhibit 8. It's the manuscript. If you could turn to page 40.

THE VIDEOGRAPHER: I just have a quick request, Counsel.

Ms. Giuffre, would you mind bringing the

1 mic higher up on your jacket, please?
 2 THE DEPONENT: Sure.
 3 THE VIDEOGRAPHER: Thank you.
 4 THE DEPONENT: Tell me if that's okay.
 5 Better?
 6 A Okay. Page 40?
 7 **Q (BY MS. MENNINGER) Right. Do you see the**
 8 **first full paragraph on that page?**
 9 A I do.
 10 **Q The first line begins: I spent my sweet**
 11 **16th birthday on his island in the Caribbean next to**
 12 **Little (sic) St. James Isle. He liked to call it**
 13 **Little St. Jeff's. His ego was enormous as his**
 14 **appetite for fornicating.**
 15 **Do you see that sentence?**
 16 A I do.
 17 **Q That is not true, correct? You were not**
 18 **spending your sweet 16th birthday on Little St. James**
 19 **Isle, correct?**
 20 A Based on my knowledge at the time that I
 21 wrote this manuscript, I thought I did spend my 16th
 22 birthday there. And so I put it down in there as
 23 that. Now I know that it wasn't my 16th birthday.
 24 **Q Or your sweet 16th birthday?**
 25 A Well, we --

1 MR. EDWARDS: Object to the form.
 2 Harassing.
 3 **Q (BY MS. MENNINGER) Was it your sweet 16th**
 4 **birthday?**
 5 A Is it not custom to call your 16th
 6 birthday sweet? Have you never heard that saying
 7 before?
 8 **Q Was it your sweet 16th birthday,**
 9 **Ms. Giuffre?**
 10 A As we --
 11 MR. EDWARDS: She's answered the question.
 12 It's been asked and answered.
 13 MS. MENNINGER: She asked me a question,
 14 actually. You're not testifying here.
 15 **Q (BY MS. MENNINGER) Was it your sweet 16th**
 16 **birthday?**
 17 A As I thought, in the manuscript when I
 18 wrote it, I thought it was my sweet 16th birthday.
 19 **Q Okay. Now that you know it wasn't, where**
 20 **did you spend your sweet 16th birthday?**
 21 A Well, I don't know.
 22 **Q Well, just give us your best guess.**
 23 MR. EDWARDS: Objection. And she's not
 24 going to guess today. She's going to tell you the
 25 answers as she remembers them.

1 If you remember the answer, please tell
 2 her the answer.
 3 A I don't know the answer, where I spent my
 4 sweet 16th birthday.
 5 **Q (BY MS. MENNINGER) Do you know who you**
 6 **were with on your sweet 16th birthday?**
 7 A No, I don't.
 8 **Q Do you know where you lived on your sweet**
 9 **16th birthday?**
 10 A No, I don't.
 11 **Q Were you living with your parents on your**
 12 **sweet 16th birthday?**
 13 A I don't know.
 14 **Q Were you living with Michael on your sweet**
 15 **16th birthday?**
 16 A I don't know. I was a runaway a lot. I
 17 don't know where I lived at the time.
 18 **Q Okay. Were you working at Taco Bell on**
 19 **your sweet 16th birthday?**
 20 A I don't think so. I don't know.
 21 **Q Were you working at Publix on your sweet**
 22 **16th birthday?**
 23 A I don't know.
 24 **Q Were you working at an aviary on your**
 25 **sweet 16th birthday?**

1 A Again, I don't know.
 2 **Q Do you recall any present you actually got**
 3 **on your sweet 16th birthday?**
 4 A No, I don't. I don't know where I spent
 5 it, who I spent it with or what I got. I'm sorry.
 6 **Q How long did you work at Mar-a-Lago?**
 7 A Best of my recollection, it was a summer
 8 job. I believe I started in June. And I think I
 9 only worked there approximately two weeks, two, three
 10 weeks.
 11 **Q How many hours a week did you work?**
 12 A I want to say it was a -- I want to say
 13 it's a full-time job.
 14 **Q Do you recall it being a full-time job?**
 15 A It was a summer job, but just thinking
 16 back, my dad used to bring me in and bring me home.
 17 So he worked full time, all day. So -- and I didn't
 18 lounge around Mar-a-Lago so, yes, I think it would
 19 have been a full-time job.
 20 **Q And how much did you make per hour?**
 21 A Approximately, I think I remember making
 22 \$9 an hour.
 23 **Q The bracelet and earrings you got for your**
 24 **birthday, some birthday, on Little -- or where was**
 25 **that birthday party, at Little St. James?**

Page 105	Page 107
1 MR. EDWARDS: Object to the form. 2 Q (BY MS. MENNINGER) Where was it? 3 A At Little Saint Jeff's. 4 Q Okay. Where are those bracelet and 5 earrings now? 6 A I left everything behind me when I went to 7 Thailand. 8 Q Where did you leave them, exactly? 9 A I had a storage facility and my apartment 10 that I lived in. 11 Q So where were they, in the storage 12 facility or in the apartment? 13 A Most likely in the apartment. 14 Q Okay. What apartment was that? 15 A Royal Palm Beach. I don't know the 16 address, I'm sorry. 17 Q You don't know the address at all? 18 A Not at all. 19 Q Okay. Where was it roughly located in 20 Royal Palm Beach? 21 A I don't know. It's been a long time since 22 I've been back to Royal Palm. I don't remember 23 street names or anything. 24 Q Did it have one or two bedrooms? 25 A It was two bedrooms.	1 Q Well, all right. We'll come back to that 2 in a minute. But the apartment that you left in 2002 3 was the one in Royal Palm Beach that you lived at 4 originally with Michael and then after breaking up 5 with Michael, Tony lived there? That's the one we're 6 talking about? 7 A Correct. 8 Q That's the apartment we're talking about? 9 A That's not the one that -- 10 Q Okay. 11 A Sorry. I'm confused. Could you please 12 reask the question? 13 Q All right. I asked you where you left 14 your bracelet or earrings. You think you -- 15 A Okay, yes. 16 Q -- left them in an apartment, correct? 17 A Okay. Yes. Yeah, not the one -- not the 18 first one. The one where Tony eventually moved into. 19 Q That's the apartment you left the bracelet 20 and earrings at? 21 A I believe so, yes. 22 Q So when you were working at Mar-a-Lago, 23 you rode with your father every day? 24 A Yes. 25 Q What car did he drive at the time?
Page 106	Page 108
1 Q Was it on the first or second floor? 2 A The second floor. 3 Q Who lived there with you? 4 A Michael first lived there with me. 5 Michael and I broke up shortly after living there. 6 And Tony lived there with me. 7 Q Okay. And that's the apartment that you 8 left when you went to Thailand? 9 A Yes. 10 Q Did you live at more than one apartment 11 with Michael? 12 A When I was a runaway, he let me stay at 13 his apartment. 14 Q Was that a different apartment? 15 A Yes. 16 Q All right. So you lived at Michael's 17 apartment when you were a runaway? 18 A Correct. 19 Q And did you live anywhere else other than 20 those two apartments with Michael? 21 A We stayed at Michael's parents' house, I 22 think for a few weeks before the apartment. 23 Q Okay. The apartment that you rented? 24 A The apartment that Michael rented. I 25 think I was too young to go on a lease.	1 A I don't know. 2 Q Okay. Did you have a vehicle of your own 3 at the time? 4 A No. 5 Q Did you have a driver's license at the 6 time? 7 A Yes. I got my permit when I was 15 and my 8 driver's license when I was 16. 9 Q Okay. And how were you paid, by cash or 10 check or some other method? 11 A I don't remember. 12 Q Did you have a bank account at that time? 13 A I don't think I've ever had a bank 14 account -- well, up until recently, living here. I 15 don't remember having a bank account. 16 Q So you believe you got paid by unknown 17 means and you did not deposit it into a bank? 18 A Correct. 19 Q What was your uniform when you worked 20 there? 21 A At Mar-a-Lago? 22 Q Right. 23 A It was a white miniskirt with a little 24 white polo top with the emblem of Mar-a-Lago on it. 25 Q Did they give you more than one?

1 A I don't know, maybe.
 2 **Q Did you wear it to and from work every**
 3 **day?**
 4 A Yes.
 5 **Q Did you get new ones when you arrived that**
 6 **were clean or did you launder them at home?**
 7 A I would have had to wash them when I got
 8 home, I suppose.
 9 **Q And you think you had more than one or you**
 10 **don't recall?**
 11 A I don't recall.
 12 **Q All right. Was that something you**
 13 **purchased or did they give it to you?**
 14 A They gave it to me.
 15 **Q And who else was wearing that uniform?**
 16 A The other locker -- the lady that did the
 17 front desk next to the locker rooms.
 18 **Q She had the same one?**
 19 A Yes.
 20 **Q Was that Adriana?**
 21 A I don't think Adriana wore a uniform. I
 22 think she just dressed professional.
 23 **Q Okay. And what other employees did you**
 24 **see there at the spa at the time when you worked**
 25 **there?**

1 A There were -- well, this is in the massage
 2 area and there's also like a fitness area. So
 3 there's spa and fitness. So there would be the
 4 masseuses and then there would be the trainers. And
 5 that was just located in that one area away from the
 6 main house and stuff.
 7 **Q And is that the area in which you worked?**
 8 A Yes.
 9 **Q In the spa area or the fitness area?**
 10 A The spa and the fitness area were in the
 11 same complex.
 12 **Q Okay. What did the other people who**
 13 **worked in the spa area wear?**
 14 A I don't remember what they wore.
 15 **Q All right. And what did the people in the**
 16 **fitness area wear?**
 17 A I don't remember. I know it was -- we had
 18 our own uniforms. Everyone else had their own.
 19 **Q Who is we?**
 20 A Well, the girls that worked in the meet
 21 and greet area. Me and the other girl with the curly
 22 hair I told you about --
 23 **Q Um-hum.**
 24 A -- had our own uniforms. And then the
 25 fitness people had their own uniforms. And the

1 masseuses had their own uniforms.
 2 **Q What did the masseuses' uniform look like?**
 3 A I don't remember.
 4 **Q No recollection at all?**
 5 A None whatsoever.
 6 **Q Color?**
 7 A No, sorry. I remember mine.
 8 **Q Okay. How did it come to pass that you**
 9 **were no longer working at Mar-a-Lago in two to three**
 10 **weeks?**
 11 A I was approached by Ghislaine Maxwell.
 12 **Q Okay. And how long had you been working**
 13 **at Mar-a-Lago when you were approached by Ghislaine**
 14 **Maxwell?**
 15 A Roughly two to three weeks.
 16 **Q Okay. Where in the spa were you when you**
 17 **were approached by Ghislaine Maxwell?**
 18 A Just outside the locker room, sitting
 19 where the other girl that works there usually sits.
 20 She was away from the desk. I was reading a book on
 21 massage therapy.
 22 **Q Was that indoors or outdoors?**
 23 A Outdoors.
 24 **Q Okay. And what -- were you in the sun or**
 25 **in the shade?**

1 A In the shade underneath a -- I don't know
 2 what you'd like to call it, but, you know, underneath
 3 the complex, the building.
 4 **Q All right. And what was Ghislaine Maxwell**
 5 **wearing when she approached you?**
 6 A I don't remember what she was wearing.
 7 **Q Any recollection, color of clothing or**
 8 **anything?**
 9 A No.
 10 **Q Okay. Any details about her? Was she**
 11 **carrying a purse or anything?**
 12 A No. She looked like, from my memory, she
 13 looked like she was either there for a massage or
 14 fitness. I remember she had a British accent. She
 15 was very interested in the book that I was reading.
 16 I mean, we can get into some more details
 17 later if you'd like, but I don't remember any more
 18 about what she was wearing that day.
 19 **Q Did you have a cell phone at that time?**
 20 A No.
 21 **Q Where were you living at that time?**
 22 A At my parents'.
 23 **Q And who else was living there with you at**
 24 **the time?**
 25 A My mother and my dad and my brother.

1 **Q Which brother?**
 2 A Sky.
 3 **Q What about your other brother?**
 4 A I think he had moved out by then.
 5 **Q What forms of communication did you have?**
 6 **Just a home phone number, or what?**
 7 A Yeah, there was a home phone.
 8 **Q When do you recall ever getting a cell**
 9 **phone?**
 10 A The first cell phone I ever got was the
 11 one that Ghislaine gave to me.
 12 **Q So you never had -- your parents, did they**
 13 **have ones when you were working at Mar-a-Lago?**
 14 A No, my dad used to -- like, we had phones
 15 in the spa and maintenance area and so on, so forth.
 16 And you could, so to speak, page people from around
 17 the courts.
 18 **Q Okay. So tell me what you recall of the**
 19 **first conversation that you had with Ghislaine**
 20 **Maxwell.**
 21 A I'm sitting there reading my book about
 22 massage therapy, as I'm working in the spa. And I'm
 23 getting my GE -- well, I was in the process of
 24 getting my GED before I went to my summer job. I
 25 decided that I would like to become a massage

1 therapist one day. And the body really intrigued me,
 2 you know, reading this massage was a lot about
 3 anatomy, blood flow. Everything to do with, you
 4 know, touching somebody somewhere and then triggering
 5 a result somewhere else. I just was very intrigued
 6 by the whole anatomy thing.
 7 She came up, Ghislaine, sorry. Ghislaine
 8 came up and approached me at the desk that I was
 9 sitting at. And my book was like this (indicating)
 10 and she said, Oh, you're reading a book about
 11 massage. You want to do massage? And I told her,
 12 Yes, you know, I'm very interested in it. One day I
 13 would like to become a masseuse.
 14 **Q All right. Where did you get the book on**
 15 **massage?**
 16 A Maybe the library.
 17 **Q Maybe or do you recall?**
 18 A I don't think I purchased it. So I'd have
 19 to say the library.
 20 **Q Okay. What library was that?**
 21 A Whichever library was close to my house.
 22 **Q Do you remember a library being close to**
 23 **your house?**
 24 A There's one in Wellington that I used to
 25 go to. Oh, no, there's one in Royal Palm. Yeah,

1 there's one in Royal Palm and Wellington, and I used
 2 to go to both.
 3 **Q Did you have a card for both?**
 4 A Did I have a card?
 5 **Q A library card?**
 6 A Yeah.
 7 **Q For both places?**
 8 A To be able to rent out a book, yeah.
 9 **Q Okay. So the best of your recollection is**
 10 **you used one of your library cards at one of those**
 11 **two libraries to check out a book on massage and**
 12 **anatomy?**
 13 A Correct.
 14 **Q And when did you do that relative to**
 15 **starting at Mar-a-Lago?**
 16 A Probably within the first week. I mean, I
 17 saw what the massage therapists got to do. I mean,
 18 their jobs were so relaxing. The music, like the
 19 atmosphere, they always had happy clients. It just
 20 seems like an ideal job.
 21 **Q And so you were spurred to go to the**
 22 **library and check out a book?**
 23 A Well, I had been talking with the other
 24 massage therapists and they're the ones who first
 25 intrigued me about what they do. And, you know, I

1 wanted to aim for something higher than being a
 2 locker room attendant one day. And. Yeah.
 3 **Q What was the name of the massage therapist**
 4 **that you were speaking with?**
 5 A Oh, I have no idea.
 6 **Q Can you give me any physical description**
 7 **of any of them?**
 8 A Um, there was one who had blonde short
 9 hair. There was -- I would say there's probably
 10 about four massage therapists that work in there.
 11 So, I mean, I don't remember all of them.
 12 **Q Okay. What time of day was it?**
 13 MR. EDWARDS: Object to the form.
 14 A Afternoon.
 15 **Q (BY MS. MENNINGER) How late?**
 16 A Anywhere between 2 to 4.
 17 **Q And what time did you get off of work?**
 18 A I believe I got off at 5.
 19 **Q And what was the rest of your conversation**
 20 **with Ms. Maxwell?**
 21 **I'm sorry, I don't think you finished.**
 22 A Thank you. Well, she noticed I was
 23 reading the massage book. And I started to have
 24 chitchat with her just about, you know, the body and
 25 the anatomy and how I was interested in it. And she

1 told me that she knew somebody who was looking for a
2 traveling masseuse.

3 And I said, Well, I don't have any
4 accreditations. This is the first book I've ever
5 read. She goes, That's okay. I know somebody. We
6 can train you. We can get you educated. You know,
7 we can help you along the way if you pass the
8 interview.

9 If the guy likes you, then, you know, it
10 will work out for you. You'll travel. You'll make
11 good money. You'll be educated, and you'll finally
12 get accredited one day.

13 **Q Okay.**

14 A She finished off by, you know, giving me
15 her number. And I told her I'd have to ask my dad.
16 And I called my dad. I ran over, actually, to see my
17 dad, talked to him. He said it would be okay. I
18 used the phone from Mar-a-Lago to call her and tell
19 her that I was allowed to come over.

20 And she said, Great. Meet me here at -- I
21 don't remember the exact address, but it was
22 El Brillo Way in Palm Beach -- after you get off.
23 And my dad drove me.

24 **Q Did you write down her add -- the address**
25 **that she gave?**

1 A Yes.

2 **Q Did you write down her phone number?**

3 A Yes.

4 **Q So did you go run and talk to your dad**
5 **while she was still there?**

6 A No, I believe she left. And she told me
7 to ask my dad and then to give her a phone call.

8 **Q Okay. Did she ask you your age when she**
9 **had that conversation with you?**

10 A No, she did not.

11 **Q Did you tell her your age?**

12 A No, I did not.

13 **Q And so somewhere you wrote down a phone**
14 **number to call her back at?**

15 A Um-hum.

16 **Q All right. And where did you write that**
17 **down?**

18 A Probably just a piece of paper lying
19 around the desk.

20 **Q Okay. But you don't remember?**

21 A I mean, no, I don't have that piece of
22 paper anymore, so no.

23 **Q Okay. And did you write down an address?**

24 A Yes.

25 **Q And what number do you think you called?**

1 **A cell phone or a home phone, or do you have any**
2 **idea?**

3 A I have no idea. Ghislaine answered. So
4 if it was a home phone, the butlers probably would
5 have answered. So most likely it was her cell phone.

6 **Q All right. And what happened when you got**
7 **off of work?**

8 A My dad drove me to El Brillo Way.

9 **Q Um-hum.**

10 A We arrived at a very large pink mansion.
11 And we knocked on the door. My dad got out of the
12 car and we knocked on the door.

13 **Q Do you recall which car this was?**

14 A I don't know what he was driving at the
15 time. My dad always drives trucks. So it would have
16 been some kind of truck.

17 **Q But you don't know which kind?**

18 A I don't know if it was a Ford or a Dodge
19 or --

20 **Q What kind of car does your mom drive?**

21 A Right now?

22 **Q No, in 2000.**

23 A Oh, I have no idea. I don't remember.
24 They change cars quite often. They like getting
25 different cars.

1 **Q When did you get your first car?**

2 A After my trip to London to meet Prince
3 Andrew.

4 **Q Okay. What kind of car did you get?**

5 A A Dodge Dakota.

6 **Q And did you purchase that yourself?**

7 A Yes, I did.

8 **Q And how much did it cost?**

9 A I don't remember off the top of my head
10 how much it cost.

11 **Q Who did you buy it from?**

12 A My dad helped me bargain with it. I don't
13 remember where we bought it from.

14 **Q And was the title put in your name or your**
15 **dad's name?**

16 A I think the title was put in my name. I
17 think. I mean, my dad was with me. I've never
18 registered a car or anything like that before. So --

19 **Q So that was your first time?**

20 A Yes.

21 **Q Memorable, right?**

22 A Yes.

23 **Q When you got there, a butler or someone**
24 **answered the door, is that what you said?**

25 A No, Ghislaine answered the door.

Q Okay. And then what happened?

A She shook hands with my dad. Like, she briefly opened the door. She stepped out, shook hands with my dad. Told her (sic) she'd look after me and she'd make sure I get a ride home. And just very briefly, that was it. And my dad left, and I went inside with Ghislaine.

Q Did Ghislaine and your dad have any discussion about what it was you were doing there, in your presence?

A You know, I can't recall exactly what was said. But I had already told my dad what was -- what the interview was for. So --

Q What did you tell your dad?

A That a very nice lady approached me and told me that she would offer me an education to become a massage therapist. And it was a great -- it would be great experience for me to be able to get educated and trained and eventually be accredited. So he was very happy for me as well.

Q You told him that outside of the presence of Ghislaine?

A Yes, when I first ran to the tennis courts where he was at.

Q And then, in your presence at the home,

did your dad and Ms. Maxwell have any conversation -- further conversation about what you were doing there?

A I don't recall. I think they probably would have chatted for approximately -- maybe 30 seconds. It really wasn't a long chat.

The things that stick out in my mind were, We will take good care of her and we'll be bringing -- we will make sure she gets a ride home.

Q And how far away did you live?

A Approximately 30 minutes.

Q And that's with your parents' house, right?

A That was my parents' house.

Q Did you see any other employees or any other people inside the house on that day?

A Yes.

Q Who else did you see?

A Juan Alessi.

Q Um-hum.

A And Maria. But Jeffrey and Ghislaine like to call them John and Mary.

Q Okay. Where did you see John?

A Downstairs after the whole ordeal.

Q Um-hum. Which room?

A The kitchen.

Q All right. Where did you see Mary?

A The same place, kitchen.

Q Were they talking to one another?

A No. Mary was doing something with the dishes. They were always either cleaning up or doing stuff, so --

Q And you saw them in the kitchen?

A In the kitchen area. I mean, you have to understand there's like three parts to that kitchen. So it's very large.

Q All right. What part did you see John in?

A In the corner, left hand. And Mary was in the same vicinity but not right next to him. They weren't chatting.

Q What is also contained in the corner, left hand of the room?

A There's like a -- like shelves with -- I don't know. Just shelves that I remember, you know, open door pantry stuff.

Q What was Ms. Maxwell wearing when you arrived at the home?

A I don't remember what she was wearing.

Q The book that you were reading at the spa that day, do you recall the name of it?

A No. I just know it was -- it said the

word massage on the front of it. I don't know the title or the author.

Q Do you know the color of the book?

A It was -- it was dark. It was a, like plastic covering.

Q All right. And how big was it, if you can just demonstrate for the video?

A Smaller than that. Maybe -- I don't -- maybe a little bit less than that.

Q Can you hold it sideways for the video?

A (Complied.)

Q So you're saying the book size was a little bit less than half of --

A Right. I mean, the book was a little bit bigger. The pages were -- you know, this is very small print. This is printed A4 longways, whereas, I think. It wasn't A4 that way. I don't know. It was just a book. And I don't know how many pages it had either. I mean, approximately, maybe 100 pages.

Q Okay. So maybe my question wasn't a very good question.

How big was the outside of the book, not the thickness, but the length and the width?

A Maybe like here (indicating).

Q So a little bit bigger?

1 A Longer than this, yeah. We're going to
2 fold it in half again, and then like that
3 (indicating).
4 **Q So larger than an 8 and a half and**
5 **11 piece of paper?**
6 MR. EDWARDS: Form.
7 A I don't know what 8 and a half and
8 11 inches is. If this is 8 and a half and 11 inches,
9 then yes. It's (indicating).
10 **Q (BY MS. MENNINGER) So when you fold it in**
11 **half, is that a little bit smaller, folded in half,**
12 **than the book --**
13 A Yeah, if I were going to hold the book
14 like this, if I were going to sit there and read the
15 book like this, in my mind it would be a little bit
16 bigger than what I'm holding right here.
17 **Q All right. So you're demonstrating the**
18 **book as it's opened that way?**
19 A Yeah, let's just say I'm reading it like
20 this.
21 **Q Okay. Got it.**
22 MS. MENNINGER: I'm going to suggest we
23 take a short break. We can --
24 MR. EDWARDS: Order --
25 MS. MENNINGER: -- order lunch for you

1 guys and then do a little bit more before the lunch
2 gets here --
3 MR. EDWARDS: Okay.
4 MS. MENNINGER: -- if that works for
5 everybody.
6 MR. EDWARDS: Yeah, that's great.
7 MS. MENNINGER: All right. Let's do that.
8 THE VIDEOGRAPHER: We're off the record at
9 11:38.
10 (Recess taken from 11:38 a.m. to
11 11:57 a.m.)
12 THE VIDEOGRAPHER: We're back on the
13 record at 11:57.
14 **Q (BY MS. MENNINGER) How long were you at**
15 **the El Brillo home on that first day you went?**
16 A Over two hours.
17 **Q Okay. And who took you home?**
18 A Juan Alessi.
19 **Q And what car was he driving?**
20 A I believe it was a black Suburban.
21 **Q Did anyone else ride in the car with you?**
22 A Just Juan.
23 **Q What time approximately did you get home?**
24 A 8:30, approximately.
25 **Q Was it dark?**

1 A Yes.
2 **Q Who else was at home when you got home?**
3 A My mom, my dad and my brother.
4 **Q Which brother?**
5 A Sky.
6 **Q And anyone else who was there at the time?**
7 A I believe Michael might have been living
8 with me at that time. So he might have been there.
9 **Q Do you recall if he was there when you got**
10 **home?**
11 A I don't really remember. I remember what
12 I did when I got home, that I basically made a
13 beeline for the bathroom.
14 **Q Let me ask you a question. Michael was**
15 **living with you at that home, at your parents' home**
16 **at the time, is your best recollection today; is that**
17 **right?**
18 A That's my best recollection, yes.
19 **Q When you say living with you, were you**
20 **guys staying in the same room?**
21 A Yes.
22 **Q Were you engaged at that time to him?**
23 A That was a really weird relationship. He
24 was a friend who looked after me, and he did propose
25 to me and I did say yes. But my heart was never in

1 it.
2 He was somebody that helped me off the
3 streets so I felt compelled to say yes to him.
4 **Q Okay. So when he proposed to you and you**
5 **said yes, did that take place before you started**
6 **working at Mar-a-Lago or after you started working at**
7 **Mar-a-Lago?**
8 A Before.
9 **Q And so if he were living with your parents**
10 **at that time, you were living in the same room; is**
11 **that correct?**
12 A I believe so.
13 **Q And your parents understood him to be your**
14 **fiance?**
15 A I don't think they agreed with it, but I
16 think they understood it as that. I mean --
17 **Q I mean, you communicated to them that he**
18 **had proposed and you had accepted?**
19 A Yeah, in not such a pretty way. I mean,
20 they obviously weren't very happy about it. And it
21 wasn't my true intentions to ever marry him.
22 **Q Okay.**
23 A But I did it to make him feel okay. I
24 didn't want to be mean.
25 **Q What did your mom say about your**

1 **engagement to Michael?**
2 A Oh, they never thought it was going to go
3 forward either.
4 **Q When you got home, you said you made a**
5 **beeline for the bathroom?**
6 A Correct.
7 **Q And what did you do in the bathroom?**
8 A I showered.
9 **Q Okay. Did you have a conversation with**
10 **anyone prior to going to the bathroom?**
11 A My mom came into the bathroom and -- and
12 she, you know, she asked me how it went. And I told
13 her I'd rather not talk about it. And she didn't
14 push me any further for any more conversation.
15 **Q Okay. And then she left the bathroom?**
16 A She left the bathroom.
17 **Q Did anyone overhear that conversation?**
18 A No, the door was closed.
19 **Q Was your dad at home?**
20 A Yes.
21 **Q Did you have a conversation with your dad**
22 **that night?**
23 A Not that I remember, no.
24 **Q And did you have any other conversation**
25 **with your mother that night?**

1 A No.
2 **Q Did you have any conversation with your**
3 **brother that night?**
4 A No. He's -- he's five years younger than
5 me. It's not something I'd talk to him about.
6 **Q And did you have any conversation with**
7 **Michael that night?**
8 A I could have. I don't remember having
9 one, but I could have.
10 **Q Did you call any of your friends that**
11 **night?**
12 A No.
13 **Q Who were your good friends at that time?**
14 A Rebecca Boylan (phonetic). That was
15 really it. I didn't really have many friends. I
16 kept to myself a lot.
17 **Q Did you call Tony Figueroa that night?**
18 A I don't think Tony and I were -- we were
19 on and off friends from middle school. And no reason
20 on and off like we had an argument or something. We
21 just got out of touch.
22 **Q Um-hum.**
23 A So, no, at that time I don't think I was
24 talking to him.
25 **Q Are you aware of any distinguishing**

1 **physical features of Ghislaine Maxwell?**
2 A I can tell you that she had very large
3 natural breasts. I can tell you that her pubic hair
4 was dark brown, nearly black. I don't remember any
5 specific birthmarks or moles that I could point out
6 that would be relevant.
7 **Q Any scar?**
8 A I don't remember any scars.
9 **Q Any tattoos?**
10 A No tattoos.
11 **Q When did you next go to the El Brillo**
12 **house?**
13 A I believe it would have been the next day.
14 **Q You believe it would have been or was it?**
15 MR. EDWARDS: Form.
16 A I know that it was consecutive, that I
17 continued to go there after my first -- the first
18 time that the abuse took place there. It was
19 consecutive that I was there, I believe, over the
20 next course of weeks.
21 **Q (BY MS. MENNINGER) What day of the week**
22 **was the first time you went?**
23 A I don't know.
24 **Q Do you know whether you went the very next**
25 **day or not?**

1 A I believe I did.
2 **Q All right. How did you get there the very**
3 **next day?**
4 MR. EDWARDS: Form.
5 A I believe my dad dropped me off again.
6 **Q (BY MS. MENNINGER) When you say you**
7 **believe, do you recall him doing that or are you**
8 **guessing?**
9 A I don't -- well, this is how I figure
10 this. I don't remember Ghislaine picking me up from
11 Mar-a-Lago. I didn't have my own car. So the only
12 way I could have really gotten there would have been
13 my dad picking me up -- I mean, sorry, dropping me
14 off.
15 **Q Do you have a distinct recollection of**
16 **your father dropping you off there more than one day**
17 **in a row?**
18 A Yes.
19 **Q You do not recall the car he was driving?**
20 A Like I said, he always drove trucks.
21 That's as good as I can get.
22 **Q And so -- and you worked on weekends as**
23 **well at Mar-a-Lago or no?**
24 A No.
25 **Q So the second day would have had to be**

1 **another weekday or was it on a weekend?**
 2 MR. EDWARDS: Form.
 3 A I don't know.
 4 **Q (BY MS. MENNINGER) Do you know if you**
 5 **went after work at Mar-a-Lago?**
 6 A Yes.
 7 **Q So you went to work the very next day at**
 8 **Mar-a-Lago?**
 9 A Yes.
 10 **Q Did you have a conversation with anyone at**
 11 **Mar-a-Lago about the day before at El Brillo?**
 12 A No.
 13 **Q You didn't talk to any of your coworkers**
 14 **about it?**
 15 A No.
 16 **Q Who was your boss at the time?**
 17 A No.
 18 **Q Did you have a boss at the time?**
 19 A I think Adriana or Adrienne. I don't
 20 remember the exact pronunciation of her name, but
 21 it's along those lines. I believe she was my boss.
 22 **Q And you did not talk to her about it?**
 23 A No.
 24 **Q You surmise that your father dropped you**
 25 **off because you can't think of another way you would**

1 **have gotten there, correct?**
 2 A Correct.
 3 **Q And when you came the second day, did your**
 4 **father come to the door?**
 5 A I don't think he came to the door that
 6 time. I think I was just dropped off.
 7 **Q All right. And what did you do when you**
 8 **got there?**
 9 A Knocked on the door and --
 10 **Q Who answered the door?**
 11 A Juan Alessi.
 12 **Q Okay. Was anyone else there besides Juan**
 13 **Alessi?**
 14 A Jeffrey, Ghislaine and Emmy Taylor.
 15 **Q Okay. And where did you see Emmy Taylor?**
 16 A She was downstairs.
 17 **Q Did you speak to her?**
 18 A Just introductions.
 19 **Q Tell me what you mean by introductions.**
 20 A My name is Virginia. Nice to meet you.
 21 Her name, she introduced herself as Emmy. And she
 22 told me she was Ghislaine's personal assistant.
 23 **Q Did you call yourself Virginia at the**
 24 **time?**
 25 A No, I think I've gone by Jenna for a long

1 time.
 2 **Q So did you introduce yourself as Virginia**
 3 **or as Jenna?**
 4 A Most likely Jenna.
 5 **Q Do you recall this or is this something**
 6 **that you're guessing about?**
 7 A Well, considering that everybody knew me
 8 as Jenna, I think I would have introduced myself as
 9 Jenna.
 10 **Q You don't recall it?**
 11 MR. EDWARDS: Form.
 12 A I don't recall the exact answer to that,
 13 no, but just knowing I had everybody pretty much call
 14 me Jenna.
 15 **Q (BY MS. MENNINGER) I'm just trying to**
 16 **make a clear record about what you do remember and**
 17 **what you're guessing about. So when you say I think**
 18 **I would have, it leads me to believe you don't recall**
 19 **it.**
 20 **If you mean something different by that --**
 21 A I --
 22 **Q -- please feel free to clarify. I'm just**
 23 **trying to explain to you what I'm asking.**
 24 A Yes. And I'm doing the very best that I
 25 can tell you exactly what it is. But it's just hard

1 for me to remember so long ago. And knowing that I
 2 introduced myself as Jenna to everybody leads me to
 3 assume that I would have introduced myself to them as
 4 Jenna as well.
 5 **Q All right. But if we were to speak to**
 6 **Emmy Taylor, she might have a different recollection,**
 7 **fair to say?**
 8 MR. EDWARDS: Form.
 9 A She could.
 10 **Q (BY MS. MENNINGER) How is it that you**
 11 **knew to come there on this second day?**
 12 A I was asked to come back.
 13 **Q When were you asked to come back?**
 14 A The day before, after the encounter they
 15 told me to come back at the same time after work.
 16 **Q Who is they?**
 17 A Jeffrey and Ghislaine.
 18 **Q Okay. Did they both simultaneously say**
 19 **that or did one of them say it?**
 20 A It was like a conversation that they both
 21 had with me separately. Jeffrey told me upstairs
 22 after the whole entire abuse had happened that he
 23 really liked me and he'd like me to come back.
 24 When I went downstairs --
 25 **Q Let me just stop you there. Did he say, I**

1 **want you to come back tomorrow?**
 2 A Yes.
 3 **Q Okay. Did he tell you what time tomorrow**
 4 **he wanted you to come back?**
 5 A No, he just said he wants me to come back
 6 tomorrow.
 7 **Q Okay. And then you went downstairs and**
 8 **what happened?**
 9 A Ghislaine told me I did a really good job
 10 and she wants me to come back tomorrow after work.
 11 **Q That's what she said, I want you to come**
 12 **back tomorrow after work?**
 13 A Yes.
 14 **Q You recall those words being used by her?**
 15 A Yes.
 16 **Q Did you ask them for a ride to get there**
 17 **the next day?**
 18 A No.
 19 **Q You just said, I'll come back tomorrow.**
 20 A Yeah. I agreed to come back the next day.
 21 **Q How did you agree?**
 22 A Verbally.
 23 **Q Okay. Was anyone else present when**
 24 **Ghislaine said that to you and you responded, I'll**
 25 **come back tomorrow?**

1 A I believe Juan Alessi was pretty much
 2 within ear distance.
 3 **Q Could you see him?**
 4 A Yes.
 5 **Q Okay.**
 6 A Like I said, in ear distance, when I mean
 7 ear distance like hearing, in the hearing vicinity.
 8 And it was in the same time that she was asking him
 9 to drop me off at home.
 10 **Q Okay. When you were driving home the**
 11 **first night with Juan Alessi, did you have any**
 12 **conversation with him?**
 13 A No. I had told him my address. It was a
 14 very quiet ride.
 15 **Q Did you ride in the front or the back?**
 16 A The front.
 17 **Q It is your contention that, Ghislaine**
 18 **Maxwell had sex with underage girls virtually every**
 19 **day when I was around her, correct?**
 20 A Yes.
 21 **Q All right. With whom did Ghislaine**
 22 **Maxwell have sex in your presence?**
 23 A Well, there's a lot of girls that were
 24 involved. We weren't on a first name basis with each
 25 other. I wouldn't be able to give you lists of names

1 of girls. It was continuous.
 2 **Q It was continuous. Name one girl that**
 3 **Ghislaine Maxwell had sex with in your presence.**
 4 A Emmy Taylor. I mean, that's a name that I
 5 know well because Emmy was always around.
 6 I'm trying to think of her name, sorry.
 7 Sarah. Her name used to be Sarah Kellen. I think
 8 she's changed it now that she's married.
 9 [REDACTED] (phonetic) -- I can't
 10 pronounce her last name properly, but it's around
 11 those lines.
 12 There were a lot of other girls that I
 13 honestly can't remember their names. I'm sorry. I
 14 wish I could help out more because I really would
 15 like to provide more witnesses for this, but I can't
 16 remember a lot of girls' names.
 17 **Q So those are the three names of females**
 18 **that you observed Ghislaine Maxwell have sex with --**
 19 **MR. EDWARDS: Object to the form.**
 20 **Mischaracterizes testimony.**
 21 **Q (BY MS. MENNINGER) -- is that what I**
 22 **understand your answer to be?**
 23 **MR. EDWARDS: Objection. Mischaracterizes**
 24 **her testimony.**
 25 A Those are -- those are some three of the

1 names that I know very well. Like I said, there was
 2 a lot more.
 3 **Q (BY MS. MENNINGER) Okay. Do you know the**
 4 **names of any other girl that you personally observed**
 5 **Ghislaine Maxwell have sex with?**
 6 A Do you mind me taking a minute to just try
 7 to reflect?
 8 **Q No.**
 9 A Um, her name is on the tip of my tongue.
 10 Her last name is [REDACTED]. I don't remember her
 11 first name off the top of my head. I normally could
 12 remember it.
 13 **Q Okay.**
 14 A There's just a blur of so many girls.
 15 It's really hard for me to remember. And you have to
 16 understand we weren't introduced to each other on a
 17 first name basis half the time. A lot of these girls
 18 would come and go and you'd never see them again.
 19 So, no, it's very difficult for me to
 20 pinpoint exactly who they were. But those four that
 21 I've given you are 100 percent.
 22 **Q Okay. Did you observe Ghislaine Maxwell**
 23 **forcing any of those four girls to have sexual**
 24 **contact with her?**
 25 **MR. EDWARDS: Form.**

1 A I don't believe that any of the girls
2 involved were truly willing participants doing it out
3 of their own wanting. I believe we were all there
4 for one purpose, and that was to keep Jeffrey and
5 Ghislaine happy and to do our jobs, which was giving
6 them erotic massages and keeping them pleased
7 sexually.

8 **Q (BY MS. MENNINGER) Okay. Do you know**
9 **what the word force means, physical force?**

10 A If you mean like held down or a gun put to
11 the head, then no.

12 **Q Okay.**

13 A But force in a word -- like a way of
14 coercion. There was definitely indirect threats that
15 you knew these people were powerful. They had a lot
16 of contacts. They were very wealthy. They were
17 people you did not want to cross lines with on a bad
18 way.

19 **Q Okay. What threats did you hear Ghislaine**
20 **Maxwell state to you?**

21 A Just the reminders of the prominent people
22 that she knows personally.

23 **Q When did Ghislaine Maxwell remind you**
24 **about the prominent people that she knows personally?**

25 A It was on a constant basis. I mean, there

1 was no just one time that she said it. It was like a
2 reminder, you know. And Jeffrey did a lot more of
3 that than she did. But she definitely made it aware
4 that we shouldn't cross boundaries with them.

5 **Q Or what would happen?**

6 A Like I said, it was more of an indirect
7 threat. And it doesn't take an intellect to figure
8 out what they mean when they say that they're
9 powerful people and they're very wealthy and they
10 know a lot of people.

11 **Q I need you to be very clear. You just**
12 **used the word "they." I've asked you about Ghislaine**
13 **Maxwell.**

14 A Okay.

15 **Q So I just want to make sure you understand**
16 **the question.**

17 A Correct.

18 **Q Because I don't want to have you, you**
19 **know, misunderstand the question.**

20 A Correct.

21 **Q So I'm asking you, what did Ghislaine**
22 **Maxwell say would happen in regards to crossing a**
23 **line with respect to her knowledge of famous people?**

24 A In a --

25 MR. EDWARDS: Object to the form.

1 Mischaracterizes her testimony.

2 You can answer.

3 A You wouldn't want to piss us off. You
4 wouldn't want to piss me and Jeffrey off. I mean
5 that's one way of saying it. Other than --

6 **Q (BY MS. MENNINGER) Did she say, I don't**
7 **want -- you would not want to piss me off?**

8 A Piss me off is probably my word, using
9 piss, but it was along those lines. I don't remember
10 the exact word that she used.

11 **Q And do you remember a specific occasion on**
12 **which she said that to you?**

13 A I remember very early on.

14 **Q Where were you?**

15 A I believe it was during my, what I call
16 the training period with Jeffrey and Ghislaine.

17 **Q Okay. And where were you?**

18 A For a specific -- and like I said, it
19 happened a lot. But for one specific, I remember
20 being out on the balcony in the house at El Brillo,
21 sitting outside with her. This is when I thought
22 that -- I didn't know that I worked for Jeffrey
23 immediately. I thought I worked for Ghislaine
24 because she was the one who brought me in. And she
25 was the one offering the majority of the training to

1 me.

2 So, yeah, it was on the balcony, outside,
3 I believe the yellow room.

4 **Q She said, You would not want to piss me**
5 **off because I know powerful people, or words to that**
6 **effect?**

7 A Words to that effect, yes.

8 **Q And did she say what would happen if you**
9 **pissed her off because she knows powerful people?**

10 A That statement alone was enough to let me
11 know. I was scared and I didn't want to -- I didn't
12 want to push any further into that question. I
13 seemed like I would obey.

14 **Q Up until that point in your life, had you**
15 **met any powerful people?**

16 MR. EDWARDS: Form.

17 A I do believe that I've been put in very
18 dangerous situations, being a runaway and having a
19 lot of bad things happen to me. Understanding the
20 word powerful people and things that could happen,
21 I've put two and two together and knew what she
22 meant.

23 **Q (BY MS. MENNINGER) Okay. So you had met**
24 **powerful people before the day that Ghislaine Maxwell**
25 **said this to you; is that your testimony?**

1 A Nowhere near as powerful as Jeffrey and
2 Ghislaine, nowhere near. But people that did scare
3 me, yes.

4 **Q Okay. And you had met those people at**
5 **what age?**

6 A I don't know what age I was. I'm sorry.
7 I was young. I was -- before I met Jeffrey and
8 Ghislaine.

9 **Q Is there any girl who you personally**
10 **observed to have sexual contact with Ghislaine**
11 **Maxwell when she was under the age of 18?**

12 A It's very hard to tell how many girls were
13 under the age of 18. My instruction from them was
14 the younger the better.

15 **Q And, again, them, who told you that?**

16 A Them, both of them. They both --
17 Ghislaine did the majority of my training in the
18 beginning. Jeffrey also insinuated and told me lots
19 of things as well.

20 **Q Okay. So you don't know the age of any**
21 **other female that you saw have sexual contact with**
22 **Ghislaine Maxwell --**

23 MR. EDWARDS: Object --

24 **Q (BY MS. MENNINGER) -- is that true?**

25 MR. EDWARDS: Object to the form of the

1 question. Mischaracterized her testimony. She
2 wasn't finished with her answer.

3 MS. MENNINGER: I wasn't finished with my
4 question when you objected. And at the end of my
5 question I said, "Is that true?" She can now restate
6 it without you suggesting to her the answer.

7 MR. EDWARDS: I have no idea what the
8 question is to even object to at this point.

9 Do you know the question?

10 A Do I know any underage girls that
11 Ghislaine slept with.

12 MS. MENNINGER: Can you please read back
13 the question?

14 (Record read as requested.)

15 MR. EDWARDS: Hold on. She wasn't
16 finished with her question, she told me. So that's
17 not the finished question.

18 MS. MENNINGER: You interrupted it. I
19 finished my question. She just read it to her.

20 **Q (BY MS. MENNINGER) Can you please answer**
21 **the question?**

22 MR. EDWARDS: Then I object to that
23 question as a mischaracterization of her testimony.
24 And she wasn't finished with her answer.

25 A It is impossible for me to know the ages

1 of all the girls that were sent to Jeffrey and
2 Ghislaine. That is my answer.

3 **Q (BY MS. MENNINGER) I did not ask you**
4 **about the girls who were sent to Jeffrey and**
5 **Ghislaine. I asked you about any girl that you**
6 **personally saw have sexual contact with Ghislaine**
7 **Maxwell.**

8 **Do you understand that question?**

9 A Do I know the ages of them?

10 **Q Do you know the age of any girl that you**
11 **saw have sexual contact with Ghislaine Maxwell?**

12 A Well, for instance, I mean, Sarah Kellen
13 was, I think, a year older than me. That's one way
14 of putting it. Emmy, I think was like a few years
15 older than me. [REDACTED] again, a few years older
16 than me. I mean, those are the girls that I can
17 actually name.

18 Without, not knowing the other girls'
19 names, there's no way for me to identify what age
20 they actually were.

21 **Q Okay. Describe for me any other girl**
22 **other than the ones that you've named who you say you**
23 **saw have sexual contact with Ghislaine Maxwell with**
24 **your own two eyes.**

25 A There's so many I don't know where you

1 want me to start. I find it impossible to answer
2 that question with the amount of girls that I have
3 witnessed. And without being able to give you
4 specific names, I don't think I'm able to answer that
5 question.

6 **Q Okay. I asked you to describe them, so**
7 **you could give me a height, a hair color, anything**
8 **else that comes to mind?**

9 A There were blondes, there were brunettes,
10 there were redheads. They were all beautiful girls.
11 I would say the ages ranged between 15 and 21.

12 **Q And why do you believe the ages ranged**
13 **from 15 to 21?**

14 A Some of them looked really young. Some of
15 them, I wouldn't say 21 looks old or anything like
16 that, but it's hard to gauge another person's age
17 without really asking them. But some of them looked
18 younger than me and some of them looked older than
19 me.

20 **Q And in what physical locations did you see**
21 **Ghislaine Maxwell have sexual contact with any girl?**

22 A 100 percent, the U.S. V.I.

23 **Q Where?**

24 A Jeffrey's island.

25 **Q Where?**

1 A In cabanas. Do you know what I mean by
2 cabana?

3 **Q I do, thank you.**

4 A In cabanas, in Jeffrey's room.

5 **Q Describe Jeffrey's room on U.S. V.I. for**
6 **me.**

7 A So can I use this as an idea? Like if
8 this is the island -- can I do that?

9 **Q I'm asking you to describe the inside of a**
10 **room.**

11 A Oh, the inside of a room. I thought you
12 meant located.

13 **Q Um-hum.**

14 A Okay. Large, stony. He had a king size
15 bed with posts on it. There was a large door, I
16 think it's called a door, where you put your clothes.
17 There was an adjacent bathroom with a more stony
18 look, giant tub.

19 **Q What color was the paint on the wall?**

20 A It was stone.

21 **Q What color was the bedspread?**

22 A White.

23 **Q What color were the sheets?**

24 A White.

25 **Q And you saw Ghislaine Maxwell have sexual**

1 **contact with an unknown, unnamed female in that room,**
2 **correct?**

3 A Absolutely.

4 **Q All right. When were you there that you**
5 **saw this happen?**

6 A This happened on so many occasions. The
7 island was a place where orgies were a constant thing
8 that took place. And again, it's impossible to know
9 how many. And, like I said, it wasn't just Jeffrey's
10 room. It was outside and, you know. It was --

11 **Q When you were outside did you see**
12 **Ghislaine Maxwell have sexual contact with a female?**

13 A When you say sexual contact does that mean
14 fornicating or down to taking explicit photos or
15 what -- can you define what you mean by sexual
16 contact?

17 **Q Sure. It generally, in my mind, means**
18 **placing either mouth or intimate parts or hands on**
19 **the breasts, buttocks, or pubic area of another**
20 **person for sexual gratification.**

21 A Sure.

22 **Q Did you see Ghislaine Maxwell have sexual**
23 **contact with a woman outside on the U.S. Virgin**
24 **Islands?**

25 A I would say a female. I wouldn't define

1 them as a woman. A woman is someone who is older.
2 But, yes, outside by the pool, down by the beach
3 there's these -- they're little -- I wouldn't call it
4 a hut. Little tiny wooden room that only could fit a
5 bed in it.

6 **Q I'm talking about outside.**

7 A That's outside.

8 **Q So let's start with by the pool.**

9 A Yes.

10 **Q Is that a different occasion than the hut?**

11 A I'm talking about many occasions.

12 **Q Okay.**

13 A Over time.

14 **Q Let's just talk about the ones that you**
15 **saw happen outside, out of doors.**

16 A Okay.

17 **Q Okay?**

18 A Yeah.

19 **Q Do you recall any such specific occasion**
20 **or is it just a big blur in your mind?**

21 A No, I mean, one occasion stands out.
22 Models were -- I think they were models -- were flown
23 in. There were orgies held outside by the pool.
24 That's one occasion.

25 **Q All right. Let's stick with that**

1 **occasion.**

2 A Okay.

3 **Q What sexual contact did you observe**
4 **Ghislaine Maxwell have with a female by the pool at**
5 **an orgy on the U.S. Virgin Islands?**

6 A Well, there was quite a few girls and it
7 was -- excuse me, if I'm saying this in an inexplicit
8 way, but I don't know how else to say it. So if you
9 don't understand, please let me know -- girl-on-girl
10 action. So there was a lot of -- what's the word for
11 it? Licking, licking vaginas, breasts.

12 **Q Okay. Which --**

13 A Fingers being used. She was involved with
14 that. I remember specifically I had to go down -- do
15 you know what I mean by go down?

16 **Q It's your testimony. Go ahead.**

17 A I had to go down on Ghislaine. Jeffrey
18 was there as well.

19 **Q And this is -- we're still by the pool?**

20 A We're still by the pool with lots of
21 girls.

22 **Q Can you name any of those girls that were**
23 **there?**

24 A They didn't even speak English. But this
25 was --

1 **Q Can you describe them physically?**
2 A Beautiful, tall, some were blonde, some
3 were sandy brown. They had a foreign tongue.
4 **Q What -- what language were they speaking?**
5 A I'm not too sure. It could have been
6 Russian. It could have been Czechoslovakian. It
7 could have been -- I think it's between those two, to
8 be honest. It could have been something else but, I
9 mean, I don't speak any other language other than
10 English, so I don't really know.
11 **Q All right. Any other time you saw**
12 **Ghislaine Maxwell have sexual contact with another**
13 **female outdoors in the U.S. Virgin Islands other than**
14 **this, models with the unknown language?**
15 A Are we talking about besides with me as
16 well?
17 **Q I don't know if you participated. I'm**
18 **asking if you observed her have sexual contact with**
19 **another female?**
20 A Another female other than myself?
21 **Q You can answer it however you want.**
22 A Well, and the list keeps going on.
23 Ghislaine and I and Jeffrey and Emmy Taylor
24 participated in, I guess what you would call a
25 foursome in the living room in the main house.

1 **Q Okay. I was asking about outdoors.**
2 **Sorry.**
3 A Oh. Well, I don't know if you'd consider
4 this outdoors, but on the beach where those -- it's
5 basically an outdoor setting. It's like a little
6 wooden house. It's not a house, only a bed can fit
7 in there. It's right on the beach. It's open.
8 **Q Um-hum.**
9 A Would you consider that outdoors?
10 **Q I have never been there. So I don't know**
11 **whether it's outdoors or not.**
12 A I would consider it outdoors. And --
13 **Q How old were you at that time?**
14 A I don't know.
15 **Q Okay.**
16 A I have no idea. Again, Ghislaine, myself,
17 Jeffrey, another girl in this blue, outdoor -- I
18 don't know what you want to call it. Cabana, that a
19 house -- just a bed could fit in.
20 **Q How many times did you visit the island?**
21 A I wouldn't be able to say. Lots of times.
22 **Q More than five?**
23 A Definitely more than five.
24 **Q More than ten?**
25 A More than ten.

1 **Q More than 20?**
2 A I would say more than 20.
3 **Q More than 50?**
4 A I don't think more than 50, but --
5 **Q Did --**
6 A I don't have an exact number. I mean,
7 if -- I think if you look at the flight logs, you
8 know, that helps, but then they're not fully
9 complete. We only have flight logs to one plane and
10 then there's a time I was flown commercially into the
11 island.
12 **Q Um-hum.**
13 A So it's really hard for me to gauge a
14 number.
15 **Q Okay. Do you have any photographs of**
16 **yourself on the island?**
17 A I know I used to, but they would be left
18 in that apartment.
19 **Q What other locations did you participate**
20 **in sexual contact with Ghislaine Maxwell, other than**
21 **the island?**
22 A Everywhere. New York, Palm Beach.
23 **Q Where in New York?**
24 A The mansion, Jeffrey's mansion.
25 **Q Okay. Anywhere else in New York?**

1 A Not at her townhouse.
2 **Q Anywhere else in New York?**
3 A No.
4 **Q In Palm Beach?**
5 A At the house in Palm Beach.
6 **Q Anywhere else in Palm Beach?**
7 A No.
8 **Q In New Mexico?**
9 A The house in New Mexico.
10 **Q Anywhere else in New Mexico?**
11 A No.
12 **Q What other countries?**
13 A France, uhm, England. Um -- we also -- I
14 mean, if we're going to talk about other countries
15 we've got to talk about international travel space or
16 plane space or whatever you want to call it because
17 it happened all the time on the planes.
18 **Q Okay.**
19 A Going from different country to country.
20 **Q Where in France did you have sexual**
21 **contact with Ghislaine Maxwell?**
22 A There's a couple places in France that we
23 used to go to.
24 **Q When you say you used to go to, how many**
25 **times did you go to France?**

Page 157

1 A I think I've been to France three times.

2 **Q All right. How old were you when you went**

3 **to France?**

4 A I don't know.

5 **Q Did you have a passport when you went to**

6 **France?**

7 A I would have had to, yes.

8 **Q You did have a passport when you went to**

9 **France?**

10 A Yes.

11 **Q And you went to France three times, you**

12 **believe?**

13 A Yes.

14 **Q And when you were in France those three**

15 **times, how many of those three times did you have**

16 **sexual contact with Ghislaine Maxwell?**

17 A Every time.

18 **Q And in what locations in France did you**

19 **have sexual contact with Ghislaine Maxwell?**

20 A The first time that I remember, we stayed

21 at a really fancy hotel.

22 **Q In what city?**

23 A Paris.

24 **Q Okay.**

25 A And it was within the view of the Champs-

Page 158

1 Elysees.

2 **Q Did you have your own room or a separate**

3 **room?**

4 A We all stayed in the same room, but that

5 room had adjoining rooms to it. So, you know, one

6 hotel room but with different rooms in it.

7 **Q Okay. And anywhere else on that one trip**

8 **that you went?**

9 A She brought in a redheaded French girl.

10 She walked up to her in Paris and, you know --

11 **Q In your presence?**

12 A In my presence.

13 **Q Um-hum.**

14 A And she walked up to this French girl to

15 show me how easy it was for her to procure girls. I

16 wasn't very good at it. And, you know, it was part

17 of my training was to bring in other girls. So she

18 walked up to her. Within five minutes she had her

19 number and that girl came over later that night to

20 the hotel and serviced Jeffrey. I didn't see

21 Ghislaine with her. I just know she told me what

22 happened and Jeffrey told me what happened.

23 **Q So you were not there?**

24 A I did not see it.

25 **Q Okay. When did you have sexual contact**

Page 159

1 **with Ghislaine Maxwell at this hotel room overlooking**

2 **the Champs-Elysees?**

3 A Before she picked up the redhead.

4 **Q And was that just you and Ghislaine or was**

5 **anyone else a participant in that?**

6 A Jeffrey and Emmy.

7 **Q And where else in France did you have**

8 **sexual contact with Ghislaine Maxwell?**

9 A The south of France.

10 **Q Where?**

11 A I wouldn't call it so much a hotel. I

12 don't know what you'd call it. It had like big

13 townhouse kind of things that you could rent out.

14 **Q Was this on the same trip or a different**

15 **trip?**

16 A Different trip.

17 **Q Okay. Who else was present for that?**

18 A Well, we were going to Naomi Campbell's

19 birthday party. It wasn't at the birthday party.

20 **Q Right.**

21 A It was before the birthday party.

22 **Q Oh, you had sexual contact with Ghislaine**

23 **Maxwell before you went to Naomi Campbell's birthday**

24 **party?**

25 MR. EDWARDS: Form.

Page 160

1 A That's correct.

2 **Q (BY MS. MENNINGER) And who else was**

3 **present during your supposed sexual contact with**

4 **Ghislaine Maxwell on this occasion?**

5 MR. EDWARDS: Object to the form of the

6 question.

7 A It wasn't supposed. It actually happened.

8 And Ghislaine was present, Jeffrey was present. I

9 believe Emily Taylor was present as well.

10 **Q (BY MS. MENNINGER) Anyone else?**

11 A There was someone else on that trip with

12 us, but they weren't involved with the sexual

13 activity at that time.

14 **Q Okay. And what was the other location in**

15 **France?**

16 A I believe the same exact place. I mean,

17 we stayed there for a few days.

18 **Q Okay. So the three locations are hotel in**

19 **Paris, same place, same place?**

20 A Correct.

21 **Q And the second and third same places were**

22 **on the same trip?**

23 A Same trip.

24 **Q Okay. And then you had a third trip to**

25 **France where you did not have sexual contact with**

Ghislaine Maxwell?

MR. EDWARDS: Form.

A I believe -- it's hard for me to remember. I remember going to quite a few different countries on that trip. I don't know if it was -- I don't know if we did it in Paris or not, to be honest. We did it in other places. But I've been to Paris three times -- or not Paris, sorry, France.

Q (BY MS. MENNINGER) Okay. All right. When did you first tell your parents that you would be traveling with Jeffrey Epstein?

A I'm not too sure when I actually told them.

Q How long after you were working with Jeffrey Epstein did you travel with him?

A Well, I know my first trip was to New York. I would say anywhere between six weeks -- I would say after six weeks.

Q You were -- you had known Jeffrey Epstein for six weeks before you started traveling with him --

A I believe.

Q -- am I understanding that correct?

A I believe so. I mean, that's an approximate answer.

Q And your first trip was to New York?

A Yes.

Q And did you just go to New York and come back or did you go somewhere else?

A I think I just went to New York, but I can't remember if we went somewhere else.

Q Okay. And did you tell your parents you were going to New York?

A Yes.

Q And do you recall any part of your conversation with your parents about going to New York?

A I didn't get into details about what I was having to do with Ghislaine and Jeffrey. I didn't tell them that, but I told them I was going to New York.

Q And you don't recall telling them anything else about it?

A I don't know. I mean, I might have called them from New York and told them it was cold and, you know, just simple stuff. But I can't really recall what I spoke to them about.

MS. MENNINGER: As I understand it, the food is here. So I'm going to suggest that now is a good time to take a break.

MR. EDWARDS: Sounds good.

MS. MENNINGER: All right.

THE VIDEOGRAPHER: We're off the record at 12:42.

(Recess taken from 12:42 p.m. to 1:21 p.m.)

THE VIDEOGRAPHER: We're back on the record at 1:21.

Q (BY MS. MENNINGER) All right.

Ms. Giuffre, I want to talk to you about where you were living in the late '90s. Do you recall -- you testified earlier, I believe, that you were living at your parents' house and you gave us an address at the time you started at Mar-a-Lago.

A Yes.

Q Do you remember where you lived previous to living at your parents' house at that time?

A Like I said, I was a runaway, so there was a lot of different places I lived. One of the places I lived was, like I told you earlier, with Michael's parents. That was somewhere around Fort Lauderdale, I believe, maybe a little bit outside of it.

Q Okay.

A Michael got an apartment and I lived in Michael's apartment for a short period.

Q And where do you recall that being?

A Somewhere in Fort Lauderdale, again.

Q Okay. And then you were living with your parents or was there another place in between?

A Then I lived with my parents.

Q Okay. And then where is the next place that you moved?

A An apartment that Jeffrey got for me in Royal Palm Beach.

Q Okay. And you don't know the address of that?

A No, I wish I could give it to you. I don't know it.

Q And you stayed in that apartment until you left for Thailand in the fall, later in the year in 2002, correct?

A Yes.

Q Right?

A Yes.

Q All right. And when did you first stop living with your parents? How old were you when you first stopped living with your parents?

MR. EDWARDS: Object to the form.

A The very first time?

Q (BY MS. MENNINGER) Um-hum.

1 A I believe I was 11.

2 **Q Okay. What caused you to stop living with**
3 **your parents when you were 11?**

4 A I just had some trouble and my parents
5 thought it would be better if they sent me to
6 California.

7 **Q Okay. What trouble did you have?**

8 A It's very hard for me to talk about.
9 There was stuff that went on in my life that, you
10 know, made me so I -- I couldn't live with my parents
11 anymore.

12 **Q What went on in your life that caused you**
13 **to not be able to live with your parents at the age**
14 **of 11?**

15 A Do I have to answer this?

16 **Q Well, did you talk to Sharon Churcher**
17 **about being molested as a child?**

18 A I did.

19 **Q And you authorized Sharon Churcher to**
20 **publish that in a newspaper, correct?**

21 A I don't think I authorized her to do it.
22 I think she -- I wouldn't say she did it on her own
23 accord. But I talked to her about it and I wasn't
24 aware of exactly what she was going to publish and
25 what she wasn't.

1 **Q So you were able to talk to a reporter for**
2 **the Mail On Sunday about this, correct?**

3 A I did tell her a little bit about my past
4 and where I came from.

5 **Q All right. So what caused you to be sent**
6 **away from your parents' home at the age of 11 to**
7 **California?**

8 A Some of the prior abuse which led me to be
9 a very troubled young teenager. I mean, I guess you
10 wouldn't call 11 a teenager yet, but led me to
11 running away a lot and -- and my family just thought
12 it was best that I get out of the area and move
13 somewhere else.

14 **Q Okay. You had run away prior to being the**
15 **age of 11?**

16 A Yes.

17 **Q All right. Was that reported to the**
18 **authorities?**

19 A That I ran away?

20 **Q Yes.**

21 A Yes.

22 **Q And where were your parents living at the**
23 **age of 11?**

24 A The same address I gave you earlier.

25 **Q Okay. So the authorities associated with**

1 **Loxahatchee, Florida were made aware that you had run**
2 **away from home at the age of 11?**

3 A Yes.

4 **Q And what abuse had you suffered prior to**
5 **the age of 11?**

6 A There was a very close family friend who
7 was a very sick man. And he took advantage.

8 **Q What's his name?**

9 A Forest.

10 **Q Forest what?**

11 A Jones.

12 **Q And where is Forest Jones today?**

13 A I don't know where he is.

14 **Q Does anyone in your family keep in contact**
15 **with him?**

16 A No.

17 **Q What did he do to you?**

18 A Um, he touched me places I shouldn't be
19 touched. He sexually abused me.

20 **Q For how long?**

21 A I don't know how long.

22 **Q Did you tell that to your parents?**

23 A They know.

24 **Q How do they know?**

25 A I told them.

1 **Q Did you tell them when you were under the**
2 **age of 11 or at the age of 11?**

3 A I told them later.

4 **Q When did you tell them?**

5 A It took me a long time to forgive my
6 parents for sending me away. I didn't feel like
7 anybody understood me. So not until later in my life
8 did I feel like I was able to talk to anyone about
9 it.

10 **Q Okay. Was it reported to the authorities?**

11 A No. I went too late to talk to anybody
12 about it.

13 **Q Did the event of you being molested cause**
14 **your parents to split up?**

15 A I think Sharon reported that, but I don't
16 think that's the case, no. My parents split up
17 because they were really messed up.

18 **Q Your parents split up because they were**
19 **really messed up?**

20 A Oh, they just didn't get along. There
21 were a lot of marital problems.

22 **Q When did they split up?**

23 A I don't really remember what year it was.

24 **Q How old were you?**

25 A I believe I was living with Jeffrey at the

Page 169

1 time.

2 **Q With whom did you live in California?**

3 A My Aunt Carol.

4 **Q And who else?**

5 A Uncle Mike.

6 **Q And with who else?**

7 A That's it.

8 **Q And for how long did you live with them?**

9 A I don't really know how long, maybe over a

10 year, maybe two years.

11 **Q And then what caused you to not live with**

12 **them anymore?**

13 A I kept running away from them, too.

14 **Q And where did you live in California?**

15 A I'm sorry?

16 **Q Where in California did you live?**

17 A Where did they live?

18 **Q Where did you live with them?**

19 A Salinas.

20 **Q And do you know the address?**

21 A No.

22 **Q Do they still live there?**

23 A No.

24 **Q When did they stop living there?**

25 A I don't know. I haven't kept in contact

Page 170

1 with them.

2 **Q And you believe you lived with them for a**

3 **little more than a year?**

4 A Maybe a year, maybe two years. I'm not

5 too sure.

6 **Q Did you go to school there?**

7 A Yes.

8 **Q Where did you go to school?**

9 A Somewhere near Salinas, I'm assuming.

10 **Q What grade were you in?**

11 A Middle school.

12 **Q Sixth grade, seventh grade?**

13 A I think sixth grade.

14 **Q And did you go there for more than one**

15 **year or just one year?**

16 A Maybe -- I don't know. I'm sorry, I don't

17 know.

18 **Q Were the authorities in Salinas alerted to**

19 **the fact that you ran away from home there?**

20 A Yes.

21 **Q How long was the longest you were away**

22 **from home in Salinas, California?**

23 A Two weeks.

24 **Q And you were in middle school?**

25 A (Indicating.)

Page 171

1 THE REPORTER: I'm sorry, your --

2 **Q (BY MS. MENNINGER) Yes? Yes or no?**

3 A Oh. Yes.

4 **Q And then when did you go back to Florida?**

5 A I don't know.

6 **Q Was your younger brother living with your**

7 **parents in Florida while you were in California?**

8 A Um-hum, yes.

9 **Q And was your older brother living with**

10 **your parents in Florida while you were in California?**

11 A I don't think so.

12 **Q How much older than you is he?**

13 A Five years.

14 **Q And when you went back to Florida, where**

15 **did you go to school, when you got back?**

16 A I believe I went to Crestwood Middle

17 School.

18 **Q And did you complete your studies at**

19 **Crestwood Middle School?**

20 A Did I get out of middle school there, yes.

21 **Q Okay. What grades were middle school?**

22 A Six, seven and eight.

23 **Q Okay. And when you went back to live with**

24 **your parents again, that was at the same address in**

25 **Loxahatchee?**

Page 172

1 A Yes.

2 **Q And you don't believe your older brother**

3 **was in the home at the time?**

4 A No, he was sent to boarding school.

5 **Q Where did he go to boarding school?**

6 A Washington.

7 **Q State or city?**

8 A Washington above California.

9 **Q When was the next time you stopped living**

10 **with your parents?**

11 A They sent me to a group home called

12 Growing Together.

13 **Q Why?**

14 A Because I kept running away.

15 **Q Were the authorities alerted when you ran**

16 **away?**

17 A Yes.

18 **Q And how old were you when you went to live**

19 **at Growing Together?**

20 A I don't know. It's hard for me to piece

21 back dates. Off the top of my head -- I don't want

22 to guess. I don't think I should guess. I don't

23 know.

24 **Q But you moved directly from living with**

25 **your parents to living at Growing Together?**

1 A I wouldn't say directly.
 2 **Q How --**
 3 A I'd say I stayed with my parents for --
 4 like, I think I finished school at Crestwood. So I
 5 would have been in, I don't know, I guess eighth
 6 grade, finished eighth grade. And then -- I don't
 7 know. I really don't know. Around eighth grade.
 8 **Q You went to Growing Together?**
 9 A I think -- I think it was then.
 10 **Q And how many years did you live at Growing**
 11 **Together?**
 12 A Over a year.
 13 **Q Were you ever in foster care?**
 14 A What Growing Together was, was like a
 15 group home that sent you away to foster parents every
 16 night.
 17 **Q So you lived in other people's homes**
 18 **during the period of time you were assigned to**
 19 **Growing Together?**
 20 A Well, you stayed at Growing Together
 21 during the day and then at night you get sent home
 22 with parents.
 23 **Q Did you go to school while you were at**
 24 **Growing Together?**
 25 A Yeah, they offer education there.

1 **Q So the education was at Growing Together?**
 2 A Yeah.
 3 **Q You did not attend a Palm Beach County --**
 4 A I did, but you had to earn your levels up
 5 to be able to go outside. So I don't remember what
 6 level you have to get up to, to go out to another
 7 school. I think there was like seven levels or
 8 something. And you had to make it to, like, level 4
 9 to be able to go to outside school.
 10 **Q So for some period of time you were**
 11 **assigned to Growing Together and you were going to**
 12 **school at Growing Together. And for some period of**
 13 **time you were going to other schools and coming back**
 14 **to Growing Together?**
 15 A Correct.
 16 **Q And then when you came back to Growing**
 17 **Together, you were sent to spend the night at a**
 18 **family's home?**
 19 A Yes.
 20 **Q So you never slept at Growing Together?**
 21 A No.
 22 **Q Did you live -- other than living at or**
 23 **staying at Growing Together during the day and**
 24 **sleeping at these other homes at night, is there**
 25 **anywhere else that you recall living in the period**

1 **between the ages of eighth grade and when you started**
 2 **working at Mar-a-Lago?**
 3 A Besides the ones I've told you about, you
 4 know, I did run away from Growing Together quite
 5 often. And I did end up being -- being abused by
 6 another older guy who I stayed with for I don't know
 7 how long.
 8 **Q How old were you then?**
 9 A I don't know. I'm sorry. I really wish I
 10 could pinpoint dates. I don't know dates.
 11 **Q Okay. What was that man's name?**
 12 A Ronald Effinger.
 13 **Q And how long were you living -- were you**
 14 **living with Ronald Effinger?**
 15 A Yes.
 16 **Q And for how long were you living with him?**
 17 A I don't know.
 18 **Q Days? Weeks? Months?**
 19 A I don't know. I mean, it wasn't days. I
 20 don't think it was weeks. It would have been close
 21 to maybe a few months.
 22 **Q Okay. And was Ronald Effinger prosecuted**
 23 **by federal authorities in South Florida?**
 24 A Yes.
 25 **Q And you were located by the FBI, I**

1 **believe?**
 2 A Yes.
 3 **Q And you gave an interview to the FBI**
 4 **concerning your time with Ronald Effinger, correct?**
 5 A Yes.
 6 **Q Did you ever get a victim's notification**
 7 **letter regarding your status as a victim in Ronald**
 8 **Effinger's federal criminal prosecution?**
 9 A I don't know. My parents handled
 10 everything.
 11 **Q Do you know if your parents received such**
 12 **a letter?**
 13 A I don't know.
 14 **Q Have you ever asked them?**
 15 A No, I've never really brought it up with
 16 them. It really pissed them off a lot, so I never
 17 brought it up with them.
 18 **Q It pissed them off that you were living**
 19 **with Ronald Effinger?**
 20 A Yes.
 21 **Q Why did it piss them off, if you know?**
 22 A Well, I think they were just disgusted,
 23 you know, that this happened to me again. And they
 24 didn't want to talk about it. They didn't want to
 25 talk about it.

1 **Q But they were aware of it?**
2 A Yes.
3 **Q Your dad came and picked you up from the**
4 **police station?**
5 A Yes.
6 **Q And your dad would not let you come home?**
7 A Well, I think it was more my mom didn't
8 want me to come home.
9 **Q Did she say why?**
10 A She just probably thought I was just going
11 to keep running away again. And --
12 **Q Did she say that to you?**
13 A Well, I asked my dad at the police station
14 if I could come home instead of going back to Growing
15 Together. And he said my mom didn't want me to come
16 home. And I told him if he didn't get me out within
17 a week, I'd run away again and he'd never hear from
18 me again.
19 **Q And how is it that you came back to be**
20 **living at their house, then?**
21 A I ran away again and I called him up and I
22 said, This is your final chance. And they came and
23 picked me up and they let me live there.
24 **Q And when did you go live with Michael?**
25 A Not long after that.

1 **Q And when did you live with Michael's**
2 **parents?**
3 A Well, I lived with Michael's parents
4 before I lived with Michael in his apartment.
5 **Q And that was an apartment that Michael**
6 **rented?**
7 A Michael and his friend. I can't remember
8 his friend's name. Mario, I think his friend's name
9 was.
10 **Q When did you live with Tony and Crystal**
11 **Figueroa as parents?**
12 A That was just a brief stint. I didn't
13 really stay there very long, but it was -- I was a
14 runaway. That's in between times of -- I don't know.
15 **Q How old were you?**
16 A I don't know.
17 **Q I just want to be clear. Michael rented**
18 **an apartment that you moved into that he had rented,**
19 **correct?**
20 A Correct.
21 **Q And that was after you had lived with**
22 **Michael and his parents, correct?**
23 A Yes.
24 **Q And that was prior to you and Michael**
25 **living with your parents when you started working at**

1 **Mar-a-Lago, correct?**
2 A Yes.
3 **Q Do I have that sequence right?**
4 A So far, yes.
5 **Q And when did you stop living at your**
6 **parents' at the time you started working at**
7 **Mar-a-Lago? How long after you started at Mar-a-Lago**
8 **do you stop living with your parents?**
9 A I don't know exact dates. I was traveling
10 with Jeffrey a lot, and I was making -- he was giving
11 me lots of money for the sex that I had with him and
12 Ghislaine.
13 And after, I would say, a short time --
14 I'm not too sure, darling, I don't know.
15 **Q All right. Can you --**
16 MS. MENNINGER: I have no recollection of
17 which number we're on in terms of exhibit.
18 MS. RODRIGUEZ: 15.
19 **Q (MS. MENNINGER) Okay. I'd like to mark**
20 **as Defendant's Exhibit 15 a document and see if you**
21 **can identify it.**
22 **Actually, before I do that, when do you**
23 **recall ever getting a passport?**
24 A I got my passport in New York. I don't
25 know what age I was.

1 **Q Okay. And did you -- how did you get it?**
2 **Did you go somewhere or what happened?**
3 A Jeffrey had me fill out paperwork and go
4 to a Kodak shop or something similar of a Kodak shop
5 and get my picture taken. I gave him my picture and
6 my paperwork. He sent it away. And I think a week
7 later he said he got it expedited.
8 **Q Did you physically go to an office in New**
9 **York?**
10 A Jeffrey's office.
11 **Q An office associated with Immigration or**
12 **Homeland Security or whatever it was called back**
13 **then?**
14 A Not that I recall.
15 **Q And do you know how old you were?**
16 A No. I don't know how old you have to be
17 to get a passport, so I'm not too sure.
18 (Exhibit 15 marked.)
19 **Q (BY MS. MENNINGER) Okay. I'm going to**
20 **show you Defendant's Exhibit 15.**
21 **Do you recognize this document?**
22 A Yes.
23 **Q Is this document the passport application**
24 **that you filled out?**
25 A Yes.

1 **Q Is it in your handwriting?**
2 A Yes.
3 **Q All right. What did you put down as your**
4 **address at this time to mail the passport to? It's**
5 **about the second line -- third line.**
6 A Number 13?
7 **Q Well, the third line says, Mail passport**
8 **to. What address did you put down?**
9 A Are we talking about number 13, Permanent
10 address, do not list P.O. box, street?
11 **Q No, I'm talking about the third line in**
12 **the entire thing that says, Mail passport to.**
13 A Oh, I'm sorry, up here, the [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 **Q All right. So you asked to have the**
17 **passport mailed to you at your parents' address,**
18 **right?**
19 A I don't know if it was mailed to my
20 parents' house, but that's the address I sent -- put
21 down, yes.
22 **Q Okay. And if you look a little bit**
23 **further to the right, roughly equal with that line,**
24 **do you see a date that's stamped on there?**
25 A Yeah, January 12th, 2001.

1 **Q Okay. And then if you go down a little**
2 **bit further, as you pointed out, line number 13, you**
3 **gave your permanent address as your parents' address,**
4 **again, correct?**
5 A Correct.
6 **Q If you look at box number 12 where it asks**
7 **for occupation, what did you write down?**
8 A Masseuse.
9 **Q Okay. If you look at line number 18, Have**
10 **you ever been issued a U.S. passport before, what did**
11 **you put down?**
12 A No.
13 **Q All right. And if you go down a little**
14 **bit further than that, emergency contact, who did you**
15 **put down?**
16 A James Austrich, who is Michael.
17 **Q Okay. So is that the fiancé you were**
18 **talking about earlier?**
19 A Yes.
20 **Q In January of 2001 were you still his**
21 **affianced?**
22 A Looks like it, yes.
23 **Q And what address did you put down for**
24 **James Austrich?**
25 A It's kind of hard to read. I think that's

1 a 3. I think it's [REDACTED]
2 [REDACTED]. I really can't make out
3 the telephone number.
4 **Q Okay. Do you see Relationship? Can you**
5 **read that?**
6 A Friend.
7 **Q Okay. Do you see just below that there's**
8 **a line that says number 21?**
9 A Do not stop -- sorry, Do not sign
10 application until requested to do so by
11 administrating an oath.
12 **Q Okay.**
13 A Applicant's signature age 13 or older.
14 **Q Oh, it's by the signature line?**
15 A Yeah.
16 **Q And that's your signature?**
17 A Yes.
18 **Q All right. And this is the document that**
19 **you recall filling out for your first passport?**
20 A I don't recall doing it, but yes, it's in
21 my handwriting and it's got all of my information on
22 it.
23 **Q Okay. And on line -- box 23 it's got your**
24 **driver's license checked off, right?**
25 A July 23. Yeah, I really can't make out

1 numbers and stuff, though.
2 **Q But the box, Driver's License is checked**
3 **off?**
4 A Yes.
5 **Q Okay. And then if you look in the lower**
6 **right-hand corner of the page, do you see what we**
7 **call a Bates stamp number? I don't know if you know**
8 **what that means.**
9 A No.
10 **Q Just the lower right-hand corner of the**
11 **document.**
12 A Giuffre 004721?
13 **Q Okay. Thank you.**
14 **So at January 2001 was James Austrich**
15 **living at Bent, I think you said, Cak Circle?**
16 A Well, he would have had to have been if I
17 put it down there.
18 **Q Okay. Was that the apartment that he had**
19 **rented?**
20 A No, it's in Royal Palm Beach. The
21 apartment he rented was in Fort Lauderdale. So this
22 could be my apartment that he lived at with me.
23 **Q Okay. So his apartment where he lived**
24 **with you was in Royal Palm Beach?**
25 A Yes.

Q And he rented that apartment?

MR. EDWARDS: Object to the form.
Mischaracterization.

A He lived there with me for a short period.
I don't -- I don't know how long he lived there with
me for.

Q (BY MS. MENNINGER) And who rented the apartment?

A Well, Jeffrey paid for the apartment. I
was the occupant, and he was an occupant.

Q Did you ever see the lease?

A Yes, I believe I had to sign the paperwork
saying that I was living there.

Q So you were living at -- is it [REDACTED]

A I can't honestly read it. It looks like a
C-a-c (sic), but that doesn't make sense.

Q So January of 2001 you signed a document under oath putting James Austrich's address at Bent something Circle, right?

A Yes.

Q And you put your permanent address and your mail your passport to at your parents' address --

A Yes.

Q -- is that right?

And it's your position that that is the apartment that Jeffrey paid for and you signed a lease?

A Yes, Jeffrey paid for it and I think I had
to sign something that said I was going to occupy it.
I don't know if James ever did.

Q Okay. And you stayed at that apartment from at least January 2001 until you left in the fall of 2002, right?

A I would say before then, yes. Like I
said, I can't really tell you the exact date that I
moved there, but --

Q Why did you have your passport sent to your parent's house if you weren't living at your parents' house?

A Um, I don't know. I guess a fail-safe.
I'm not too sure.

Q When was the next passport that you got?

A I think I had to reapply for one in --
well, this one expired in 2002. So I would have had
to apply for another one.

Q I'm asking do you remember when you got another passport?

A This expired January 10th, 2002.

Q Let me have you put the paper down.

A Yes.

Q Do you recall applying for another passport?

A No.

Q Okay. Do you recall ever applying for another passport, ever?

A Well, yeah, when I got to Australia I had
to -- I don't have it on me right now, but I could
tell you it's -- I had to apply for another one
because the other one ran out as expiree.

Q So whenever one expired, you applied for another one from the U.S.?

A (Indicating.)

Q Have you ever gotten -- Is that right?

A Yeah.

Q Have you ever gotten a passport from Australia?

A An Australian passport?

Q Right.

A No.

Q Have you ever lost a passport and had to get one replaced?

A I don't think so.

Q When was the first time that you came back to the U.S. from Australia?

A October 16th, 2013.

Q And did you come back before that?

A No.

Q Did you ever tell Sharon Churcher or Sharon White or Marianne Strong that you were going on a trip to New York in 2011?

A No.

Q Is it your contention that Ghislaine Maxwell sexually trafficked you to famous people?

A If you have a document in front of you
that you could show me so I could see what you're
talking about, yes.

Q I'm asking you, is it your contention that Ghislaine Maxwell sexually trafficked you to famous people?

A Could you be more specific, like are we
talking about rock stars or royalty or --

Q Politically connected and financially powerful people.

A Yes.

Q Okay. To whom did Ghislaine Maxwell sexually traffic you?

A You have to understand that Jeffrey and

1 Ghislaine are joined hip by hip, okay? So they both
2 trafficked me. Ghislaine brought me in for the
3 purpose of being trafficked. Jeffrey was just as a
4 part of it as she was. She was just as a part of it
5 as he was. They trafficked me to many people. And
6 to be honest, there is people I could name and then
7 there's people that are just a blur. There was so
8 much happening.

9 **Q Okay. Please name a person that Ghislaine**
10 **Maxwell directed you to go have sex with?**

11 A Prince Andrew.

12 **Q Okay. Who else?**

13 A As a whole, they both trafficked me to
14 people. It was under both of their direction. So
15 it's not easy just to say Ghislaine. When I say
16 they, I mean both of them.

17 **Q Okay. Well, I need you to say a time when**
18 **Ghislaine Maxwell directed you to go have sex with**
19 **another person. So can you please tell me to whom**
20 **Ghislaine Maxwell asked you to go have sex with**
21 **another person?**

22 MR. EDWARDS: Object to the form.

23 A Glenn Dubin.

24 **Q (BY MS. MENNINGER) Who else?**

25 A I'm going to continue to tell you that

1 they both directed me to do it. It was part of my
2 training. They both told me, you've got tickets to
3 go here. This is who you're meeting, and this is
4 what you're doing.

5 So [REDACTED] is another one.

6 **Q Ghislaine Maxwell directed you to go have**
7 **sex with [REDACTED]?**

8 MR. EDWARDS: Object to the form to the
9 extent it mischaracterized her testimony.

10 A I'm trying to tell you that they both did,
11 Ghislaine and Jeffrey both directed me. They both
12 paid me and they both directed me.

13 **Q (BY MS. MENNINGER) All right. When did**
14 **Ghislaine Maxwell direct you to go have sex with**
15 **[REDACTED]?**

16 MR. EDWARDS: Object to the form. Same
17 objection.

18 A I don't know the time. I don't -- you
19 know, I could tell you the place. I don't know the
20 time.

21 **Q (BY MS. MENNINGER) What words did**
22 **Ghislaine Maxwell use in talking to you and asking**
23 **you to go have sex with [REDACTED]?**

24 A We're sending you to a gentleman. We want
25 you to show him a good time. We want you to do

1 exactly what you would do for Jeffrey to him. Keep
2 him happy. I can't remember her exact words, and I'm
3 not going to put words in my mouth to make it sound
4 like what she said. But it was all along those
5 lines.

6 **Q Those are words that Ghislaine Maxwell**
7 **used to you in directing you to go have sex with**
8 **[REDACTED]**

9 MR. EDWARDS: Object to the form.
10 Mischaracterized her testimony.

11 A Along those lines, yes.

12 **Q (BY MS. MENNINGER) Okay. Where were you**
13 **located when she used those words with you?**

14 A It could have been Palm Beach. It could
15 have been New York.

16 **Q You don't recall?**

17 A I don't recall.

18 **Q Okay. How old were you when she used**
19 **those words to you?**

20 MR. EDWARDS: Object to the form.

21 Mischaracterizes her testimony.

22 A I don't know. I would think I was 17.

23 **Q (BY MS. MENNINGER) But you're not sure?**

24 A Well, it was in the beginning, like after
25 my training. Glenn Dubin and [REDACTED] were

1 the two first people I was sent out to.

2 **Q Okay. Well, I was asking about [REDACTED]**
3 **[REDACTED] okay?**

4 A Right. That's what I'm saying. If you
5 want me to categorically tell you when it happened
6 and why I think I was 17, because those were the two
7 first people I was sent to.

8 **Q So you don't actually recall the**
9 **conversation regarding [REDACTED]? You don't**
10 **recall where you were, right?**

11 A I can't picture if it was New -- I know it
12 was either New York or Palm Beach. I don't remember
13 exactly which one.

14 **Q You don't recall exactly what words were**
15 **used by Ghislaine Maxwell in speaking to you,**
16 **correct?**

17 A I remember the tone that she used, the
18 type of words that she used. I can't word for word
19 replay what she said.

20 **Q All right. And so when in time was**
21 **[REDACTED] relative to Prince Andrew?**

22 A [REDACTED] was months, six months,
23 I'm not too sure.

24 **Q Six months what?**

25 A Before Prince Andrew. I don't know, I

1 think I met Prince Andrew in 2001. And Glenn Dubin
2 and Stephen Kaufmann were, like I said, the first
3 people I was sent out to after my training. So I
4 don't know. I'm not going to give you an exact time
5 if I don't know it.

6 **Q I asked you the relative order.**

7 A And I'm trying to give you it.

8 **Q And where does Alan Dershowitz fit into**
9 **that group of people?**

10 A Same. I can't tell you piece by piece by
11 piece who -- I know Glenn Dubin was first.

12 **Q Okay.**

13 A And I know Stephen Kaufmann was one of the
14 first I was sent to. Alan Dershowitz could have been
15 between there. Between, sorry, between Glenn and
16 Stephen. The first time I was with Alan Dershowitz
17 was in New York, so I wasn't actually sent to him.
18 It actually happened at one of Jeffrey's residences.

19 (Ms. McCawley left the deposition.)

20 A So it's very hard for me to
21 chronologically give you each person individually.

22 **Q (BY MS. MENNINGER) Okay. Name the other**
23 **politically connected and financially powerful people**
24 **that Ghislaine Maxwell told you to go have sex with?**

25 A Again, I'm going to tell you "they"

1 because that's how it went. They instructed me to go
2 to George Mitchell, Jean Luc Brunel, Bill Richardson,
3 another prince that I don't know his name. A guy
4 that owns a hotel, a really large hotel chain, I
5 can't remember which hotel it was. Marvin Minsky.

6 There was, you know, another foreign
7 president, I can't remember his name. He was
8 Spanish. There's a whole bunch of them that I
9 just -- it's hard for me to remember all of them.
10 You know, I was told to do something by these people
11 constantly, told to -- my whole life revolved around
12 just pleasing these men and keeping Ghislaine and
13 Jeffrey happy. Their whole entire lives revolved
14 around sex.

15 They call massages sex. They call
16 modeling sex. They call --

17 **Q I asked you the names for people. Are you**
18 **going to tell me any other names or is that all of**
19 **them?**

20 A I'm trying to think. That's the answer
21 I'm trying to give to you. It's that it's so hard to
22 just keep naming and naming and naming.

23 **Q All right.**

24 A A lot of times I would be introduced to
25 them. I didn't know --

1 **Q If you're going to tell me more names,**
2 **please continue your answer.**

3 A I'm trying to think.

4 **Q If you're just going to talk --**

5 A I'm sorry. I'm trying to think.

6 **Q Okay. Let's take a break and then you can**
7 **think over the break.**

8 THE VIDEOGRAPHER: We're off the record at
9 2:01.

10 (Recess taken from 2:01 p.m. to 2:09 p.m.)

11 THE VIDEOGRAPHER: We're back on the
12 record at 2:09.

13 **Q (BY MS. MENNINGER) Ms. Giuffre, you have**
14 **filed a lawsuit against Ghislaine Maxwell, correct?**

15 A Yes.

16 **Q You understand her to be my client,**
17 **correct?**

18 A Yes.

19 **Q I'm here today to talk to you about your**
20 **allegations against Ghislaine Maxwell.**

21 **Do you understand that?**

22 A Yes.

23 **Q I want you to tell me a single time that**
24 **you recall Ghislaine Maxwell using words to you and**
25 **directing you to go have sex with another person --**

1 MR. EDWARDS: Object.

2 **Q (BY MS. MENNINGER) -- not anybody else,**
3 **Ghislaine Maxwell?**

4 MR. EDWARDS: Objection. Asked and
5 answered.

6 To the extent that she can answer the
7 question, I'd ask that she answer the question.

8 A I have answered the question. The
9 question that you're asking me is Ghislaine. And
10 Ghislaine and Jeffrey worked together. They were one
11 and the same of persons. They both directed me to do
12 this. They both directed me to report back to them.
13 They were both the same.

14 **Q (BY MS. MENNINGER) You cannot recall a**
15 **single instance in which Ghislaine --**

16 A I have to --

17 **Q Excuse me.**
18 **-- in which Ghislaine Maxwell alone**
19 **directed you to have sex with another person --**

20 A I have to --

21 **Q -- correct?**

22 A -- believe --

23 MR. EDWARDS: Object.

24 MS. MENNINGER: I am going to finish my
25 question.

Q (BY MS. MENNINGER) Correct?

MR. EDWARDS: Are you finished with your question?

MS. MENNINGER: Now you may make your objection. And then she may answer.

MR. EDWARDS: Okay. Objection. Argumentative. Harassing for absolutely no reason. Mischaracterizing the witness's testimony.

Answer, if you can.

A I have given you the names of the people that Ghislaine herself has told me to go be sex trafficked to, along with Jeffrey Epstein, okay?

She's the one who brought me to Jeffrey Epstein to be trafficked in the fucking first place.

So I have given you as much information as I possibly can to let you know what she was about, who she told me to go with, what she wanted me to do. That is what I am stating and that's what I previously stated to you.

Q (BY MS. MENNINGER) And these names that you have just given are people to whom Ghislaine Maxwell alone told you to go have sex?

MR. EDWARDS: Objection. Mischaracterization.

A Ghislaine and Jeffrey, I don't know how

many times you want me to keep answering this question. Both told me to do this, okay? They both sent me to these people.

How many times do you want me to answer this?

Q (BY MS. MENNINGER) I think you're answering a different question so that's why I'm going to ask you again. I am not asking you anything about a time when Jeffrey and Ghislaine together told you to go do something. I'm asking you to name a single time during which Ghislaine Maxwell acting alone directed you to go have sex with another person?

MR. EDWARDS: Objection. Asked and answered. Harassing. Argumentative.

A I've given you the names of the people that Ghislaine instructed me to go have sexual relations with. I am not discluding (sic) the fact that Jeffrey also told me.

Ghislaine told me from her mouth to do these things. Jeffrey told me from his mouth to do these things with these people. Ghislaine instructed me to do the things that I did with Jeffrey Epstein on the very first meeting that I had with him. She brought me there under the preclusion (sic) that I

was going to be trained as a masseuse and that she instructed me to take off my clothes and to give oral sex to Jeffrey Epstein.

Q (BY MS. MENNINGER) Excuse me. I've asked you for the names.

A I've just given you a name. Jeffrey Epstein is a big name.

Q All right.

A She instructed me on that one.

Q So you're saying --

MR. EDWARDS: The witness is finishing her answer right now. She's in the process of explaining one of the people Ghislaine told her to have sex with.

Q (BY MS. MENNINGER) So you're saying Ghislaine Maxwell directed you to have sex with Jeffrey Epstein?

A Correct.

Q Ghislaine Maxwell directed you to have sex with Glenn Dubin?

A Correct.

Q What words did Ghislaine Maxwell tell you to go have sex with Glenn Dubin?

A It was the same all the time, all right?

They want me to go provide these men with a massage.

And when they say massage, that means erotic, okay? That's their term for it. I think there are plenty of other witnesses that can attest to what massage actually means.

And I'm telling you that Ghislaine told me to go to Glenn Dubin and give him a massage, which means sex.

Q Okay. So Glenn -- Ghislaine Maxwell told you to go give a massage to Glenn Dubin?

A Correct.

Q That's your testimony?

A That is my testimony.

Q All right. Ghislaine Maxwell told you to go give a massage to [REDACTED], correct?

A Correct.

Q Ghislaine Maxwell told you to give a massage to Prince Andrew, correct?

A Correct.

Q Ghislaine Maxwell told you to give a massage to Bill Richardson, correct?

A Correct.

Q When did Ghislaine Maxwell tell you to give a massage to Bill Richardson?

A I don't know dates.

Q Where were you?

1 A When it happened?

2 **Q When Ghislaine Maxwell used the words, Go**
3 **give a massage to Bill Richardson, where were you?**

4 MR. EDWARDS: Object to the form.

5 Mischaracterizes her testimony.

6 A I can't tell you where we were. I know
7 where I was sent to. I don't know where we were when
8 she told me to do that.

9 **Q (BY MS. MENNINGER) Where were you sent**
10 **to --**

11 A New Mexico.

12 **Q -- by Ghislaine Maxwell?**

13 MR. EDWARDS: Object to the form.

14 Mischaracterizes her testimony again.

15 A Are you smiling at me because --

16 **Q (BY MS. MENNINGER) No, I'm asking you to**
17 **answer the question.**

18 A I have answered the question. I was sent
19 to New Mexico.

20 **Q Okay. Where were you sent from?**

21 A I already answered that. I don't know
22 where I was sent from.

23 **Q Okay.**

24 A I was flying everywhere with these people.

25 **Q Where were you sent by Ghislaine Maxwell**

1 **to have sex with Jean Luc Brunel?**

2 MR. EDWARDS: Object to the form.

3 Mischaracterized her testimony.

4 A Many places.

5 **Q (BY MS. MENNINGER) Ghislaine Maxwell sent**
6 **you to many places to have sex with Jean Luc Brunel?**

7 MR. EDWARDS: Object to the form.

8 A It happened at many places, yes.

9 **Q (BY MS. MENNINGER) You had sex with Jean**
10 **Luc Brunel at many places is what you're saying,**
11 **correct?**

12 A I was sent to Jean Luc Brunel at many
13 places to have sex with him.

14 **Q When did Ghislaine Maxwell send you to a**
15 **place to have sex with Jean Luc Brunel?**

16 A You are asking --

17 MR. EDWARDS: Form.

18 A -- me to answer the impossible.

19 **Q (BY MS. MENNINGER) All right. When did**
20 **Ghislaine Maxwell send you to have sex with the owner**
21 **of a large hotel chain?**

22 MR. EDWARDS: Object to the form.

23 Mischaracterization.

24 A I'm going to keep answering the questions
25 the same way that I keep answering them. I don't

1 know where it was when she said to go do this.

2 **Q (BY MS. MENNINGER) Okay. Where were you**
3 **sent to have sex with the owner of a large hotel**
4 **chain by Ghislaine Maxwell?**

5 MR. EDWARDS: Object to the form.

6 A I believe that was one time in France.

7 **Q (BY MS. MENNINGER) Which time in France?**

8 A I believe it was around the same time that
9 Naomi Campbell had a birthday party.

10 **Q Where did you have sex with the owner of a**
11 **large hotel chain in France around the time of Naomi**
12 **Campbell's birthday party?**

13 A In his own cabana townhouse thing. It was
14 part of a hotel, but I wouldn't call it a hotel.

15 Jeffrey was staying there. Ghislaine was
16 staying there. Emmy was staying there. I was
17 staying there. This other guy was staying there. I
18 don't know his name.

19 I was instructed by Ghislaine to go and
20 give him an erotic massage.

21 **Q She used the words erotic massage?**

22 A No, that's my word. The word massage is
23 what they would use. That's their code word.

24 **Q Was she in the room when you gave this**
25 **erotic massage to the owner of a large hotel chain?**

1 A No, she was not in the room. She was in
2 another cabana.

3 **Q And other than telling you to go give the**
4 **owner of this large hotel chain a massage, do you**
5 **remember any other words she used to you to direct**
6 **you in what you should do?**

7 A Not at the time, no.

8 **Q Where did -- where were you and where was**
9 **Ms. Maxwell when she directed you to go have sex with**
10 **Marvin Minsky?**

11 MR. EDWARDS: Object to the form.

12 A I don't know.

13 **Q (BY MS. MENNINGER) Where did you go to**
14 **have sex with Marvin Minsky?**

15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.

18 **Q And when was that?**

19 A I don't know.

20 **Q Do you have any time of year?**

21 A No.

22 **Q Do you know how old you were?**

23 A No.

24 **Q Other than Glenn Dubin, Stephen Kaufmann,**
25 **Prince Andrew, Jean Luc Brunel, Bill Richardson,**

1 **another prince, the large hotel chain owner and**
 2 **Marvin Minsky, is there anyone else that Ghislaine**
 3 **Maxwell directed you to go have sex with?**

4 A I am definitely sure there is. But can I
 5 remember everybody's name? No.

6 **Q Okay. Can you remember anything else**
 7 **about them?**

8 A Look, I've given you what I know right
 9 now. I'm sorry. This is very hard for me and very
 10 frustrating to have to go over this. I don't -- I
 11 don't recall all of the people. There was a large
 12 amount of people that I was sent to.

13 **Q Do you have any notes of all these people**
 14 **that you were sent to?**

15 A No, I don't.

16 **Q Where are your notes?**

17 A I burned them.

18 **Q When did you burn them?**

19 A In a bonfire when I lived at Titusville
 20 because I was sick of going through this shit.

21 **Q Did you have lawyers who were representing**
 22 **you at the time you built a bonfire and burned these**
 23 **notes?**

24 A I've been represented for a long time, but
 25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
 2 and we believed that these memories were worth
 3 burning.

4 **Q So you burned notes of the men with whom**
 5 **you had sex while you were represented by counsel in**
 6 **litigation, correct?**

7 MR. EDWARDS: Object to the form.

8 A This wasn't anything that was a public
 9 document. This was my own private journal, and I
 10 didn't want it anymore. So we burned it.

11 **Q (BY MS. MENNINGER) When did you write**
 12 **that journal?**

13 A Just over time. I started writing it
 14 probably in, I don't know, I can't speculate, 2012,
 15 2011.

16 **Q So you did not write this journal at the**
 17 **time it happened?**

18 A No.

19 **Q You started writing this journal**
 20 **approximately a decade after you claim you finished**
 21 **being sexually trafficked, correct?**

22 A Yes.

23 **Q And you started writing a journal after**
 24 **you had a lawyer, correct?**

25 A Correct.

1 **Q Including Mr. Edwards, who is sitting**
 2 **right here, correct?**

3 A Correct.

4 **Q What did that journal look like?**

5 A It was green.

6 **Q And what else?**

7 A It was just a spiral notebook.

8 **Q Okay. And what did you put into that**
 9 **green spiral notebook?**

10 A Bad memories. Things that I've gone
 11 through, lots of things, you know. I can't tell you.
 12 There was a lot of pages. It was over 300 pages in
 13 that book.

14 **Q Did you ever show that book to your**
 15 **lawyers?**

16 A No.

17 **Q Did you show that book to anyone?**

18 A My husband.

19 **Q Did you show it to anyone else besides**
 20 **your husband?**

21 A No.

22 **Q Did you tear out pages and give them to**
 23 **Sharon Churcher?**

24 A No, I wrote -- those pages that you're
 25 talking about, I wrote for her specifically. She

1 wanted to know about the Prince Andrew incident.

2 **Q So that's a different piece of paper?**

3 A Yeah, that's just random paper.

4 **Q So you had a green spiral notebook that**
 5 **you began sometime in 2011 or 2012 in which you wrote**
 6 **down your recollections about what had happened to**
 7 **you, and you burned that in a bonfire in 2013.**

8 **Did I get that right?**

9 A You got that right.

10 **Q And do you have no other names of people**
 11 **to whom you claim Ghislaine Maxwell directed you to**
 12 **have sex, correct?**

13 A At this time, no.

14 **Q Is there any document that would refresh**
 15 **your recollection that you could look at?**

16 A If you have a document you'd like to show
 17 me, I would be glad to look at it and tell you the
 18 names I recognize off of that.

19 **Q I'm just asking you if there's a document**
 20 **you know of that has this list of names in it?**

21 A Not in front of me, no.

22 **Q Where is the original of the photograph**
 23 **that has been widely circulated in the press of you**
 24 **with Prince Andrew?**

25 A I probably still have it. It's not in my

1 possession right now.

2 **Q Where is it?**

3 A Probably in some storage boxes.

4 **Q Where?**

5 A In Sydney.

6 **Q Where in Sydney?**

7 A At some family's house. We got the boxes

8 shipped to Australia, and they were picked up off the

9 porch by my nephews and brought to their house.

10 **Q Which is where?**

11 A In Sydney.

12 **Q Where in Sydney?**

13 A [REDACTED]

14 **Q And who lives in that house?**

15 A Well, it's owned by my mother-in-law and

16 father-in-law, but my nephews live in the house.

17 **Q What are their names?**

18 A I'm not giving you the names of my

19 nephews.

20 **Q What's the address of the house?**

21 A Why would you want that?

22 **Q I want to know where the photograph is.**

23 **I'm asking you where the photograph is. And you've**

24 **just told me it's somewhere in [REDACTED]?**

25 A Yes.

1 **Q So where in [REDACTED] is the photograph**

2 **located?**

3 A If I can't 100 percent say that the

4 photograph is there, it could be at my house that I

5 presently live in. I'm not going to give you the

6 address of my nephews' residence.

7 **Q When is the last time you saw the**

8 **photograph in person?**

9 A When I packed and left America.

10 **Q Colorado?**

11 A Yes.

12 **Q All right. So you had that photograph**

13 **here with you in Colorado?**

14 A Yes.

15 **Q What's on the back of the photograph?**

16 A I'm sorry?

17 **Q Is there anything on the back of the**

18 **photograph?**

19 A There's like the date it was printed, but

20 no writing or anything.

21 **Q Okay. Does it say where it was printed?**

22 A I don't believe so. I think it just -- I

23 don't remember. I just remember there's a date on

24 it.

25 **Q Whose camera was it taken with?**

1 A My little yellow Kodak camera.

2 **Q Who took the picture?**

3 A Jeffrey Epstein.

4 **Q And where did you have it developed?**

5 A I believe when I got back to America.

6 **Q So where?**

7 A I don't know.

8 **Q Palm Beach?**

9 A I don't know.

10 **Q What is the date the photograph was**

11 **printed?**

12 A I believe it's in March 2001.

13 **Q Okay.**

14 A But that's just off of my photographic

15 memory. I don't -- it could be different, but I

16 think it's March 2001.

17 **Q You have a photographic memory?**

18 A I'm not saying I have a photographic

19 memory. But if I'd look at the back of the photo and

20 I remember what it says, I believe it was March 2001.

21 **Q Did the photograph ever leave your**

22 **possession for a while?**

23 A I gave it to the FBI.

24 **Q Okay. And when did you get it back?**

25 A When they took copies of it.

1 **Q When was that?**

2 A 2011.

3 **Q When they came to interview you?**

4 A Yes.

5 **Q So from 2011 until you left Colorado it**

6 **was in your personal possession?**

7 A Yes.

8 **Q What other documents related to this case**

9 **are in that, storage boxes in Australia?**

10 MR. EDWARDS: Object to the form.

11 A Documents related to this case -- there --

12 I don't know. I really can't tell you. I mean,

13 there's seven boxes full of Nerf guns, my kids' toys,

14 photos. I don't know what other documents would be

15 in there.

16 **Q (BY MS. MENNINGER) Did anyone search**

17 **those documents after you received discovery requests**

18 **from us in this case?**

19 A I haven't been able to obtain those boxes.

20 I can't get them sent back up to me. It's going to

21 cost me a large amount of money. And right now I'm

22 trying to look after my family, so I'm not able to

23 afford to get them up.

24 **Q You live in Australia, correct?**

25 A I do.

1 **Q Okay. How far away are the boxes from**
2 **where you live in Australia?**
3 A Sydney is down here at the bottom. Cairns
4 is up here at the top.
5 **Q Okay.**
6 A It's probably a six-day drive.
7 **Q Did you fly here through Sydney?**
8 A No.
9 **Q Have you been to Sydney since you've moved**
10 **back to Australia?**
11 A I flew into Sydney with my three kids, but
12 it was a connecting flight to Brisbane.
13 **Q Did you ask your nephews or anyone else to**
14 **search those boxes in response to discovery requests**
15 **that we issued in this case?**
16 A They are my nephews. I would never let
17 them look at those.
18 **Q Other than your green spiral notebook,**
19 **what else did you burn in this bonfire in 2013?**
20 A That was it.
21 **Q That's the only thing?**
22 A Yes.
23 **Q Did you use wood?**
24 A Yes.
25 **Q Charcoal?**

1 A My husband built the bonfire out of wood
2 and I don't know what else he put in it. He's the
3 one who always makes the fires, not me.
4 **Q Who else was present?**
5 A Just him and I.
6 **Q Were your kids there?**
7 A No. They were inside sleeping.
8 **Q And what beach was this?**
9 A It wasn't a beach. It was in my backyard.
10 **Q What's your address?**
11 A At that time?
12 **Q Um-hum.**
13 A [REDACTED].
14 **Q [REDACTED]**
15 A Yes.
16 **Q Who were your neighbors?**
17 A Sweet people. Ray and -- I could look on
18 my phone if you want.
19 **Q No, thank you. Do they still live there?**
20 A Yes.
21 **Q Do you keep in touch with them?**
22 A Last time I talked to them was a few
23 months ago.
24 **Q Did they see the fire?**
25 A They've seen many fires that we've had.

1 We've had lots of bonfires there.
2 **Q Did you ever ride in a helicopter with**
3 **Ghislaine Maxwell acting as pilot of the helicopter?**
4 A Yes.
5 **Q Who else was on the flight?**
6 A I've been on the helicopter with her
7 plenty of times. I can't mention how many people
8 were on the -- on the helicopter at the same time.
9 **Q How many times?**
10 A I don't know. Do you have helicopter
11 records that you could show me?
12 **Q I'm asking you how many times you were on**
13 **the helicopter with Ghislaine Maxwell acting as the**
14 **pilot --**
15 A It's impossible for me to answer the
16 question without having the actual physical records
17 in front of me.
18 **Q I'm asking you to look into your memory**
19 **and tell me how many times you recall being on a**
20 **helicopter with Ghislaine Maxwell at the pilot seat?**
21 A There is no number I can give you.
22 There's plenty of times I've been on her helicopter.
23 **Q Where did you go from and to on a**
24 **helicopter?**
25 A I believe it was -- don't quote me on this

1 because I get confused on the islands there. I want
2 to say it was St. John's. It could have been
3 St. Barts. St. John or St. Barts, and then we would
4 fly straight to Jeffrey's island.
5 **Q Okay. Did you ever go anywhere else on**
6 **the helicopter?**
7 A No.
8 **Q Were you ever on the helicopter with Bill**
9 **Clinton and Ghislaine Maxwell as the pilot of the**
10 **helicopter?**
11 A No.
12 **Q Were you ever on the helicopter with Bill**
13 **Clinton's Secret Service and Ghislaine Maxwell as the**
14 **pilot?**
15 A No.
16 **Q Do you recall telling Sharon Churcher that**
17 **you were?**
18 A No.
19 **Q Did you see the press article in which**
20 **Sharon Churcher reported that you were?**
21 MR. EDWARDS: Objection. I'd just ask
22 that if you're going to ask this witness about a
23 specific article I'd like for her to see the article.
24 Otherwise she's not going to testify about it.
25 If you have something to show her, then,

1 please.

2 **Q (BY MS. MENNINGER) Do you recall seeing a**
3 **press article in which Sharon Churcher reported that**
4 **you were on a helicopter with Bill Clinton and**
5 **Ghislaine Maxwell as the pilot?**

6 MR. EDWARDS: Again, I'll let you answer
7 the question once she's looking at the document that
8 you're being asked about.

9 MS. MENNINGER: You're not letting her
10 answer a question about whether she recalls a
11 particular press statement?

12 MR. EDWARDS: I will let her answer every
13 question about the press statement as long as she
14 sees the press statement. I'm okay with that. She
15 can answer all of them.

16 MS. MENNINGER: No, there is a rule of
17 civil procedure that allows you to direct a witness
18 not to answer a question when there's a claim of
19 privilege.

20 What privilege are you claiming to direct
21 her not to answer this question?

22 MR. EDWARDS: I thought that you wanted
23 accurate answers from this witness. If the --

24 MS. MENNINGER: I asked her if she
25 recalled something --

1 MR. EDWARDS: If the sole purpose is to
2 just to harass her --

3 MS. MENNINGER: I asked her if she
4 recalled something --

5 MR. EDWARDS: Then that's just not going
6 to be what's happening today.

7 **Q (BY MS. MENNINGER) All right. So you're**
8 **refusing to answer a question about whether you**
9 **recall a particular press statement --**

10 MR. EDWARDS: She's --

11 **Q (BY MS. MENNINGER) -- is that true?**

12 MR. EDWARDS: She is not refusing to
13 answer any questions. She --

14 A I'm not refusing to answer. I just want
15 to see the article you're talking about so I can be
16 clear in my statement.

17 **Q (BY MS. MENNINGER) Do you recall seeing a**
18 **press article written by Sharon Churcher reporting**
19 **that you flew on a helicopter with Bill Clinton and**
20 **Ghislaine Maxwell as the pilot?**

21 A No, I do not recall reading a press
22 article saying that I was on a helicopter with Bill
23 Clinton as Ghislaine is the pilot.

24 **Q Do you recall telling Sharon Churcher that**
25 **you had conversations with Bill Clinton regarding him**

1 **flying on a helicopter with Ghislaine Maxwell?**

2 A I believe that it was taken out of
3 context. Ghislaine told me that she flew Bill
4 Clinton in. And Ghislaine likes to talk a lot of
5 stuff that sounds fantastical. And whether it's true
6 or not, that is what I do recall telling Sharon
7 Churcher.

8 **Q So you told Sharon Churcher that Ghislaine**
9 **Maxwell is the one who told you that she flew Bill**
10 **Clinton in the helicopter?**

11 A I told Sharon Churcher that Ghislaine flew
12 Bill Clinton onto the island, based upon what
13 Ghislaine had told me.

14 **Q Not based upon what Bill Clinton had told**
15 **you, correct?**

16 A Correct.

17 **Q Did you ever ask Sharon Churcher to**
18 **correct anything that was printed under her name,**
19 **concerning your stories to Sharon Churcher?**

20 A I wasn't given those stories to read
21 before they were printed.

22 **Q After they were printed did you read them?**

23 A I tried to stay away from them. They were
24 very hard. You have to understand it was a very hard
25 time for me and my husband to have to have this

1 public -- we didn't think it was going to be this
2 publicly announced and that big. So we turned off
3 the news and we stopped reading so many things.

4 **Q You didn't read the articles about your**
5 **stories to Sharon Churcher --**

6 A I've read some articles --

7 **Q Let me just finish. You did not read the**
8 **articles published by Sharon Churcher about your**
9 **stories to Sharon Churcher?**

10 A I have read some articles about what
11 Sharon Churcher wrote. And a lot of the stuff that
12 she writes she takes things from my own mouth and
13 changes them into her own words as journalists do.

14 And I never came back to her and told her
15 to correct anything. What was done was done. There
16 was nothing else I can do.

17 **Q So even if she printed something that were**
18 **untrue you didn't ask her to correct it, correct?**

19 A There was things that she printed that
20 really pissed me off, but there was nothing I could
21 do about it. It's already out there.

22 **Q She printed things that were untrue,**
23 **correct?**

24 MR. EDWARDS: Objection to the form.
25 Mischaracterization.

1 A I wouldn't say that they were untrue. I
2 would just say that she printed them as journalists
3 take your words and turn them into something else.

4 **Q (BY MS. MENNINGER) She got it wrong?**

5 MR. EDWARDS: Object to the form.

6 Mischaracterization.

7 A In some ways, yes.

8 **Q (BY MS. MENNINGER) Did she print things**
9 **in her articles that you did not say to her?**

10 MR. EDWARDS: I object and ask that the
11 witness be given the opportunity to see the document
12 so that she can review it and answer that question
13 accurately. Otherwise she's unable to answer the
14 question. I'm not going to allow her to answer.

15 MS. MENNINGER: You know the civil rules
16 tell you not to suggest answers to your client.

17 **Q (BY MS. MENNINGER) And you understand**
18 **your lawyer is now directing you to not all of a**
19 **sudden remember what your answer is. That's what**
20 **he's suggesting that you say. So you're not supposed**
21 **to listen to him suggest that to you. You're**
22 **supposed to tell me from your memory.**

23 MR. EDWARDS: That is not what I'm --

24 **Q (BY MS. MENNINGER) Did you --**

25 MR. EDWARDS: That's not what I'm doing.

1 You don't get to just talk over me and
2 tell my client when not to listen to me. All you
3 have to do to get answers is show her the document
4 you're talking about, and I'll let her answer every
5 question. I don't know why we're so scared of the
6 actual documents.

7 MS. MENNINGER: I don't know why you're
8 scared of your client's recollection, Mr. Edwards.
9 But anyway --

10 MR. EDWARDS: Why would you do this to
11 her?

12 **Q (BY MS. MENNINGER) Did Sharon Churcher**
13 **print things that you did not say?**

14 MR. EDWARDS: I'm going to instruct my
15 client not to answer unless you give her what it is
16 that you're talking about that was printed. And she
17 will tell you the answer, the accurate answer to your
18 question. Just without the document to refresh her
19 recollection and see it, she's not going to answer
20 the question.

21 **Q (BY MS. MENNINGER) Did Sharon Churcher**
22 **print things that you did not say?**

23 MR. EDWARDS: Same objection. Same
24 instruction not to answer.

25 I think I've made a very clear record as

1 to why I want my client to answer all of these
2 questions, but I want her to have the fair
3 opportunity to see this document.

4 **Q (BY MS. MENNINGER) Did Sharon Churcher**
5 **print things that you felt were inaccurate?**

6 MR. EDWARDS: Same objection. Same
7 instruction. If she sees the document, she's going
8 to answer every one of these questions.

9 **Q (BY MS. MENNINGER) Did any other reporter**
10 **print statements that you believe are inaccurate?**

11 MR. EDWARDS: Same objection. Same
12 instruction.

13 **Q (BY MS. MENNINGER) Did any reporter print**
14 **statements about Ghislaine Maxwell that were**
15 **inaccurate?**

16 MR. EDWARDS: Same objection. Same
17 instruction.

18 This is harassing. This is harassing a
19 sexual abuse victim. And all I'm asking is for
20 fairness, that we just let her see the document so
21 she can answer this.

22 MS. MENNINGER: Mr. Edwards, please stop
23 saying anything other than an objection, what the
24 basis is, or instructing your client not to answer.

25 MR. EDWARDS: I will do that.

1 MS. MENNINGER: That's what the Federal
2 Rules of Civil Procedure provide.

3 MR. EDWARDS: I hear you. They also
4 provide for fairness and civility. And all I'm
5 asking, very calmly, is for her to see this.

6 MS. MENNINGER: Mr. Edwards, this is not
7 your deposition. I'm asking your client what she
8 remembers. If she doesn't want to talk about what
9 she remembers, then let her not answer. But you
10 cannot instruct her not to answer unless there's a
11 privilege.

12 What privilege --

13 MR. EDWARDS: I am instructing her not to
14 answer.

15 **Q (BY MS. MENNINGER) All right. You are**
16 **refusing to answer questions about whether statements**
17 **to the press about Ghislaine Maxwell attributed to**
18 **you were inaccurate?**

19 MR. EDWARDS: She's not refusing not to
20 answer.

21 A You are refusing to show me these
22 documents so I could answer properly. I would give
23 you an answer if you were to show me some documents.

24 **Q (BY MS. MENNINGER) You can't say without**
25 **looking at a document whether the press attributed to**

1 **you is accurate or inaccurate?**
2 A Please show me the document.
3 **Q You can't say from the top of your head**
4 **whether any inaccurate statement has been attributed**
5 **to you in the press?**
6 A Please show me a document and I will tell
7 you.
8 **Q Are you refusing to answer my questions**
9 **about your knowledge of whether inaccurate statements**
10 **have been attributed to you in the press?**
11 A Are you refusing to give me the documents
12 to look at?
13 **Q Are you refusing to answer the question?**
14 A I am refusing to answer the question based
15 upon the fact that you are not being fair enough to
16 let me see the document in order to give you an
17 honest answer.
18 **Q Ms. Giuffre --**
19 A Yes.
20 **Q -- we are talking about press that has**
21 **been published on the Internet, correct?**
22 A Yes.
23 **Q Do you have access to the Internet?**
24 A Yes.
25 **Q Have you looked on the Internet and read**

1 **articles that attribute statements to you about**
2 **Ghislaine Maxwell?**
3 A Yes.
4 **Q Do you know any statement that has been**
5 **attributed to you in a press article on the Internet**
6 **about Ghislaine Maxwell that is untrue?**
7 MR. EDWARDS: Same objection. Same
8 instruction.
9 A Please show me a specific document.
10 **Q (BY MS. MENNINGER) Do you know of any**
11 **such statement about Ghislaine Maxwell attributed to**
12 **you by the press that is inaccurate?**
13 A If you could please show me a specific
14 document.
15 **Q Tell me what Sharon Churcher asked you to**
16 **write for her.**
17 A Any knowledge that I had about my time
18 with Prince Andrew.
19 **Q And did you write it?**
20 A Um-hum.
21 **Q What did you write it in or on?**
22 A Paper.
23 **Q What kind of paper?**
24 A Lined paper.
25 **Q Was it in a book or single sheets?**

1 A Single sheets.
2 **Q And did you write a long document or a**
3 **short document? What was it?**
4 A I can't recall how long the document was,
5 but I would say it would be a few pages.
6 **Q And other than asking you to write**
7 **whatever you remember about Prince Andrew, did she**
8 **give you any other directions about what you should**
9 **write?**
10 A She was interested in two things, really.
11 How Epstein got away with so many counts of child
12 trafficking for sex and how Prince Andrew was
13 involved in it. Those were her two main inquiries.
14 **Q What did she ask you to write?**
15 A She asked me to write about Prince Andrew.
16 **Q Did she tell you to put it in your own**
17 **handwriting?**
18 A No, she just asked me to write down what I
19 can remember.
20 **Q Did you give her everything that you**
21 **wrote?**
22 A Did I give her the whole entire pages that
23 I wrote?
24 **Q Yes.**
25 A Yeah, I wrote pages for her specifically.

1 **Q In your own handwriting?**
2 A In my own handwriting.
3 **Q And what you wrote, was that true?**
4 A Yes.
5 **Q And did you get paid for those pieces of**
6 **paper?**
7 A Not for the papers, I don't believe.
8 **Q Okay. Have you gotten paid when they've**
9 **been reprinted?**
10 A No.
11 **Q Have you negotiated any deal with Radar**
12 **Online?**
13 A No.
14 **Q Have you negotiated any deal with Sharon**
15 **Churcher for the purpose of publishing those pieces**
16 **of paper?**
17 A Not those pieces of paper.
18 **Q When did you write those pieces of paper?**
19 MR. EDWARDS: Object to the form.
20 A A week before she came out.
21 **Q (BY MS. MENNINGER) And when did you give**
22 **them to her?**
23 A When she came out.
24 **Q When was that?**
25 A Sometime, I believe, in early 2011.

Q What did you get paid for, if not for those pieces of paper?

MR. EDWARDS: Object to the form.

A I was paid for the picture with Prince Andrew with his arm around me, Ghislaine in the background. And I was paid for the, I guess, the print of the stories.

Q (BY MS. MENNINGER) Anything else?

A No.

Q You were not paid for those pieces of paper?

A No.

Q All right. And how many pieces of paper did you write?

A Like I said, I'm rounding it around three.

Q Three pieces of paper?

A That's what I -- I don't remember to be exact on a number. I'm sorry. But over three pages.

Q And you wrote those sometime in 2011?

A The week that she was coming out to see me.

Q And you gave them to her, right?

A I gave them to her.

Q Did you keep a copy of that?

A No.

Q Did you rip them out to make them look like they came out of a journal?

A No.

Q Were you directed to make them look like they came out of a journal?

A No.

Q Do you know why your lawyer would have told the federal judge in New York that that's what you did?

MR. EDWARDS: Object to the form.

A My lawyer in New York?

Q (BY MS. MENNINGER) Um-hum.

A Ripped them out of a journal?

Q Said that you had. Do you know why she would have said that?

A Maybe she thought that I did.

Q But you didn't?

A They were just pieces of paper written for Sharon Churcher's purpose.

Q And not directed to look like they came from a journal?

A Nobody told me to make them look like they came from a journal. They were just pieces of paper that I wrote down for Sharon Churcher.

Q Did Ghislaine Maxwell tell Prince Andrew

that you were 16 years old?

A No. I think -- I think they had played the guessing game and I was 17.

Q And so Ghislaine Maxwell did not tell Prince Andrew that you were only 16?

MR. EDWARDS: Object to the form.

Speculation.

Q (BY MS. MENNINGER) In your presence?

A I don't remember the exact conversation.

I just remember they liked to play the guessing game a lot.

Q And so you don't recall Ghislaine Maxwell telling Prince Andrew in your presence that you were quote, only, really only 16, right?

A Correct, I don't remember that.

Q And if that were in the paper, that would be untrue, correct?

A Correct.

MS. MENNINGER: I think now might be a good time for a break.

THE DEPONENT: Thank you.

MR. EDWARDS: Okay. Sounds good.

THE VIDEOGRAPHER: We're off the record at 2:45.

(Recess taken from 2:45 p.m. to 2:55 p.m.)

THE VIDEOGRAPHER: We're back on the record at 2:55.

Q (BY MS. MENNINGER) Do you have any photographs of yourself either nude or in a sexually compromising position that you claim were taken by Ghislaine Maxwell?

A I do not have any of those in my evidence. But if you ask Ghislaine Maxwell, she would have plenty.

Q Do you have any in your storage boxes in Sydney?

A No.

Q Do you know whether your attorneys have any such photographs that you claim were taken by Ghislaine Maxwell?

A No.

Q You don't know or they don't have them?

A I don't know. And I don't think they have them. If they had them, they would have told me. You should ask your client. She's got plenty of them.

Q What type of camera did Ghislaine Maxwell use?

A It was a black camera. And it had a, I don't know the types and names of them, but the lens

1 that goes out.

2 **Q Was it digital or single reflex?**

3 A Again, I don't know types of cameras. I

4 mean, I use my phone for using a camera. So it's a

5 black camera and it had a lens that you could put out

6 further or bring back.

7 **Q Did you ask her to take any photographs of**

8 **you?**

9 A No. She asked to take photographs of me.

10 **Q Was it a film or a digital camera?**

11 A I never saw how she printed them out.

12 **Q What's the first time you told anybody**

13 **that you had been sexually trafficked?**

14 MR. EDWARDS: Form.

15 A Tony Figueroa, my ex-boyfriend, knew some

16 of the stuff that was happening, though I did not go

17 in great detail to him, being that he's my boyfriend.

18 And then the first person I really opened up to about

19 everything was my husband.

20 **Q (BY MS. MENNINGER) Did you tell Tony**

21 **Figueroa that you were forced to have sex with**

22 **Jeffrey Epstein?**

23 A Yes.

24 **Q Did you tell Tony Figueroa you were forced**

25 **to have sex with Ghislaine Maxwell?**

1 A Yes.

2 **Q Did you tell Tony Figueroa that Ghislaine**

3 **Maxwell sent you to have sex with famous people?**

4 A Yes.

5 **Q When did you tell Tony Figueroa that?**

6 A During conversations. Like, I'd call him

7 from places that I was at and just talk to him. And

8 like I said, I wouldn't get into great detail about

9 things. But, you know, I had to be with this person

10 or that person today and --

11 **Q Did you tell Tony Figueroa not to call the**

12 **police?**

13 A No. Tony enjoyed his lifestyle with me.

14 So he wouldn't have gone to the police.

15 **Q Did you tell James Michael Austrich that**

16 **you were sexually trafficked?**

17 A You know, I don't know what I told Michael

18 at the time. I know he asked me and I think I told

19 him, but I didn't get into detail with him.

20 **Q What do you think you told him?**

21 A That I wasn't just massaging these people.

22 **Q Did you tell him what you were doing with**

23 **Jeffrey Epstein?**

24 A Yes.

25 **Q Did you tell James Michael Austrich what**

1 **you were doing with Ghislaine Maxwell?**

2 A Yes.

3 **Q Did you tell him what you were doing to**

4 **other people?**

5 A I don't think I told him about many other

6 people, no.

7 **Q What people did you tell him about?**

8 A Mainly Ghislaine and Jeffrey.

9 **Q When did you tell him that?**

10 A From the start.

11 **Q When was the start that you told him?**

12 A From, I wouldn't say the first meeting,

13 but I told him around that time.

14 **Q And what did Michael Austrich tell you to**

15 **do?**

16 A He didn't mind what I had to do. Again,

17 he was another guy that used me because I made lots

18 of money, and he didn't tell me to do anything.

19 **Q Did he tell you not to tell the police?**

20 A No, he didn't tell me not to do anything.

21 **Q Did he tell you to tell the police?**

22 A Again, he told me not -- he didn't tell me

23 to do anything.

24 **Q When did you tell your parents that you**

25 **were sexually trafficked by Jeffrey Epstein?**

1 A After I had my kids.

2 **Q When did you tell your parents that you**

3 **were sexually trafficked by Ghislaine Maxwell?**

4 A I told them the same time about Jeffrey

5 and Ghislaine. So sometime after I had my children.

6 **Q After you had had all three children or**

7 **after you had your first child?**

8 A I think after I had all three of my

9 children.

10 **Q What was the last year in which you had a**

11 **child?**

12 A 2010.

13 **Q So you believe you told your parents**

14 **sometime after 2010 that you had been sexually**

15 **trafficked?**

16 A Yes.

17 **Q You didn't tell your parents that you had**

18 **a lawsuit entitled Jane Doe 102 versus Jeffrey**

19 **Epstein in 2009?**

20 A I wasn't very close with my parents.

21 **Q Why not?**

22 A We just had a hard relationship.

23 **Q Why?**

24 A Because we did. I don't know why. Some

25 people just don't get along.

1 **Q Do you get along with your parents now?**
2 A I get along with my parents now, yes.
3 **Q Okay. Have you ever told anyone that you**
4 **were a sex slave for four years?**
5 A Under the assumption that I got my dates
6 wrong, yes, I probably have.
7 **Q And that's not true, correct?**
8 A Not because I didn't mean it to be true.
9 Just because I didn't know my dates.
10 **Q So four years is not two years, correct?**
11 MR. EDWARDS: Object to the form.
12 A Four years is not two years.
13 **Q (BY MS. MENNINGER) What did your parents**
14 **say when you told them that you had been sexually**
15 **trafficked by Jeffrey Epstein and Ghislaine Maxwell?**
16 A I believe they were disgusted.
17 **Q What did they tell you to do or to not do?**
18 A I don't remember the exact conversations
19 that we had, but they weren't happy.
20 **Q Were they both on the phone at the same**
21 **time?**
22 A No.
23 **Q Who was on the phone first?**
24 MR. EDWARDS: Object to the form.
25 A I don't know.

1 **Q (BY MS. MENNINGER) You were in Australia**
2 **at the time, correct?**
3 A Yes.
4 **Q They were not?**
5 A Yes.
6 **Q Have they ever been to see you in**
7 **Australia?**
8 A My dad has.
9 **Q Has your mom ever been to see you in**
10 **Australia?**
11 A No, my mom is afraid of flying.
12 **Q When did your dad come to see you in**
13 **Australia?**
14 A The birth of my son, my first one in 2006.
15 And then, I believe in 2010 when my daughter was
16 born.
17 **Q And did you have this conversation with**
18 **your dad about this in person or on the phone?**
19 A I've had conversations with him about it
20 since.
21 **Q I'm talking about the first time you had a**
22 **conversation with your dad.**
23 A On the phone.
24 **Q What caused you to tell him in 2010?**
25 A I was just starting to accept what I had

1 been through. I think for ten, however long many
2 years, I mean, over ten years, I had tried to start a
3 new life, become a new person. And I wanted to put
4 all that stuff behind me and not think about it. But
5 after you have children, something changes in you and
6 you just want to stand up and do the right thing and
7 protect any other children from having to go through
8 this.
9 **Q Did you tell your parents how much money**
10 **you received from your settlement with Jeffrey**
11 **Epstein?**
12 A No. That is a -- I think there's like a
13 non-disclosure statement. I don't know exactly what
14 the legal term is, but --
15 **Q Did you send any money to your parents?**
16 A No, I don't -- no. No, I've never sent
17 money to my parents.
18 **Q Who is Anthony Valladares?**
19 A One of Tony's shady friends.
20 **Q Did you talk to Anthony Valladares about**
21 **your involvement with Jeffrey Epstein?**
22 A No.
23 **Q Did you ever live with Anthony Valladares?**
24 A No, he used to come over to my house.
25 **Q Between 2000 and 2002 did you ever have**

1 **any interactions with law enforcement?**
2 A Yes.
3 **Q When?**
4 A When I tried to break away from Jeffrey
5 and Ghislaine, I started making myself unavailable.
6 And I got a job at Road House Grill. And Tony used
7 to come pick me up in the afternoons, at nighttime,
8 and he'd sit at the bar. And there's this big cup
9 that's got tips in it.
10 I was in the back room. And I had to --
11 first you have to sign out and you have to take off
12 your aprons, put your aprons away. And there's a
13 whole bunch of cleaning up stuff you have to do.
14 In that time period, Tony grabbed money
15 from a cup that had money in it. That was for the
16 bartenders for their tips. My boss called me the
17 next day. He told me that I had stolen the money,
18 which I hadn't. And I came back and I returned the
19 money after I confronted Tony about it. Gave the
20 money back to him and he said, I'm sorry, but it's
21 just law that I have to call the police. So he
22 called the police.
23 And knowing that Jeffrey has got the Palm
24 Beach Police Department in his pocket, I went to
25 Jeffrey Epstein and I told him what had happened.

1 And Jeffrey said, Don't worry about it. Let me take
 2 care of it for you.
 3 **Q Okay. I'm sorry. When did you have**
 4 **interaction with law enforcement, then?**
 5 A What year?
 6 **Q Did you speak with a law enforcement**
 7 **officer?**
 8 A I don't believe I spoke to them. Jeffrey
 9 handled everything.
 10 **Q Okay. And you said that you had finished**
 11 **your shift at -- this is at the Road House Grill,**
 12 **correct?**
 13 A Correct.
 14 **Q You had finished your shift?**
 15 A Yeah, it was the end of the shift.
 16 **Q Okay. And you had cleaned up and were**
 17 **checking out, correct?**
 18 A Yeah, it's a completely separate part of
 19 the -- it's like back of the house. Do you know what
 20 that means, like in waitering terms?
 21 **Q (Indicating.)**
 22 A Yeah, back of the house.
 23 **Q And what was -- who was this boss that you**
 24 **spoke to?**
 25 A I can't remember his name.

1 **Q Okay.**
 2 A But, I mean, he was very nice. He didn't
 3 want to but he just had to because it's just the law.
 4 You know, the money was returned to him, but he still
 5 had to do what he had to do.
 6 **Q You paid him back the money the next day?**
 7 A Very next day.
 8 **Q And did you ever speak with the Palm Beach**
 9 **County Sheriff's Office about it?**
 10 A You know, I don't know if they called me
 11 or not, but I know that since my boss told me he had
 12 to call the police, I went to Jeffrey. And Jeffrey
 13 said he'd handle it.
 14 **Q How old were you at the time?**
 15 A I don't know, 18, maybe 19.
 16 **Q You weren't a juvenile, were you?**
 17 A Well, juvenile being under 18, no.
 18 **Q Is that the only interaction with law**
 19 **enforcement that you had between 2000 and 2002?**
 20 A Correct.
 21 **Q Were you, in fact, charged with theft**
 22 **based on that case?**
 23 A No charges were ever brought to me.
 24 **Q Do you know if they were filed?**
 25 A No. Jeffrey told me he'd handle it, and I

1 never heard anything about it ever again.
 2 **Q Did you ever check to see if you had a**
 3 **warrant out?**
 4 A No. Jeffrey told me that he took care of
 5 it.
 6 **Q Do you think it's a problem to leave the**
 7 **country when you have an outstanding warrant?**
 8 MR. EDWARDS: Object to the form.
 9 Foundation. Lack of predicate.
 10 A I don't think I have an outstanding
 11 warrant. Why would I -- do you have a document that
 12 says I have an outstanding warrant?
 13 **Q (BY MS. MENNINGER) I'm just asking you if**
 14 **you believe it's a bad thing to leave the country**
 15 **when you have an outstanding warrant?**
 16 A Absolutely.
 17 **Q And you would never assist someone in**
 18 **doing that, correct?**
 19 A Correct.
 20 **Q During the year 2015, have you spoken to**
 21 **law enforcement about any topic other than Ghislaine**
 22 **Maxwell?**
 23 A In 2015?
 24 **Q Um-hum.**
 25 A Did I talk to any law enforcement about

1 Ghislaine Maxwell?
 2 **Q About anything other than Ghislaine**
 3 **Maxwell?**
 4 MR. EDWARDS: And I would just object at
 5 this point in time and instruct the witness not to
 6 convey any answers as to who she has or who she has
 7 not disclosed until such time as the Court rules on
 8 the current outstanding motion.
 9 I know that we have some obligations to
 10 fulfill by the 4th. We intend to do that. And I
 11 also recognize we may be back to answer some of these
 12 questions. But for today, she's not going to answer
 13 those questions.
 14 MS. MENNINGER: Well, I'm just going to
 15 ask them and --
 16 MR. EDWARDS: I understand.
 17 **Q (BY MS. MENNINGER) Have you spoken to any**
 18 **law enforcement in Colorado since the beginning of**
 19 **January 2015?**
 20 A I can't answer that question right now.
 21 MR. EDWARDS: Hold on one second. I may
 22 be able to get you an answer to that question. Can I
 23 take -- can I just take a quick break, and I think I
 24 can answer that particular question for you?
 25 MS. MENNINGER: I'm not asking you to

1 answer any questions --
 2 MR. EDWARDS: Fine.
 3 MS. MENNINGER: -- Mr. Edwards.
 4 MR. EDWARDS: Fine.
 5 MS. MENNINGER: I appreciate it, but I'm
 6 asking the witness to answer these questions.
 7 MR. EDWARDS: I know, I'm just trying to
 8 help you today.
 9 For today, don't answer the questions.
 10 THE DEPONENT: I don't mind explaining.
 11 MR. EDWARDS: I know, but you --
 12 THE DEPONENT: Okay.
 13 MR. EDWARDS: I wanted to help.
 14 THE DEPONENT: Okay.
 15 **Q (BY MS. MENNINGER) So have you spoken to**
 16 **any law enforcement officers in Colorado since**
 17 **January of 2015 until today?**
 18 A I am not answering that question.
 19 **Q Have your attorneys spoken to any law**
 20 **enforcement officers in Colorado since the beginning**
 21 **of 2015 until today?**
 22 A I'm not answering that question.
 23 **Q Have you been living with your husband in**
 24 **Australia since October of 2015?**
 25 A Yes.

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
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 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 **other terms of his probationary period?**
 2 A No. He went to everything that he was
 3 supposed to go to.
 4 **Q Has he paid his fines?**
 5 A Yes, as far as I know.
 6 **Q Describe for me the contract that you had**
 7 **with the Mail On Sunday?**
 8 A Could you be a little bit more specific?
 9 Like --
 10 **Q Have you had more than one contract with**
 11 **the Mail On Sunday?**
 12 A Well, there was one contract for the
 13 picture. And that was to pay me 140,000 for the
 14 picture. And then two stories were printed after
 15 that for the amount of 10,000 each.
 16 **Q Is that the only money that you received**
 17 **from the Mail On Sunday?**
 18 A Correct.
 19 **Q Did you receive any money for syndication**
 20 **of the photograph?**
 21 A Isn't that what the 140 was for?
 22 **Q I'm asking you.**
 23 A Well, I don't really know what syndication
 24 means.
 25 **Q Did you have a written contract with the**

1 **Mail on Sunday?**
 2 A Yes.
 3 **Q Where is that contract right now?**
 4 A I don't know. I've moved that many times.
 5 I -- I lose paperwork wherever I go.
 6 **Q Is it possible it's in the boxes in**
 7 **Sydney?**
 8 A I don't think I kept it, to be honest.
 9 **Q Did you ever refer back to it after you**
 10 **signed it?**
 11 A I know I kept it for a short while, but I
 12 mean, like I said, I've moved countries twice in the
 13 last two years and three different houses. So the
 14 paper trail is lost. I don't know where it would be.
 15 **Q Did you receive it via e-mail?**
 16 A No. I received it -- Sharon Churcher
 17 handed it to me by paper.
 18 **Q And you signed it?**
 19 A I signed it.
 20 **Q And then did you make a copy of it?**
 21 A No.
 22 **Q You never had a copy of it?**
 23 A Well, I had my own copy. I'm sure she has
 24 hers.
 25 **Q Do you recall there being a period of**

1 **exclusivity?**
 2 A Yes.
 3 **Q What was that period?**
 4 A I believe it was like a three-month period
 5 or something.
 6 **Q Okay. And what other terms of the**
 7 **contract, do you recall?**
 8 A I couldn't talk to any other news
 9 publication about the story.
 10 **Q Anything else?**
 11 A Not that I know of.
 12 **Q Were you happy when the period was up?**
 13 A Well, I mean, at that time I wanted to
 14 write about my story. So I guess, yes, I was happy
 15 when that period was up.
 16 **Q And you were actively writing a book at**
 17 **that time, correct?**
 18 A My manuscript. I've never published it.
 19 **Q You were writing the manuscript at the**
 20 **time of your period of exclusivity with Sharon**
 21 **Churcher, correct?**
 22 A Those three months were just craziness. I
 23 think I started after that.
 24 **Q You think you started writing the book**
 25 **after the 90 days were up?**

1 A Yeah.
 2 **Q And then you attempted to sell that**
 3 **manuscript, correct?**
 4 A I didn't attempt to sell it. I went to
 5 other publications, like, what do you call them?
 6 People -- I'm trying to think of the name of the
 7 word. People who publish books, not like a newspaper
 8 or anything. And I inquired about what they thought
 9 of my manuscript and if they thought it was, you
 10 know, a good story. And, yeah.
 11 **Q So you sent the manuscript to these people**
 12 **for the purposes of trying to publish the book,**
 13 **correct?**
 14 A Some people, yes.
 15 **Q And you were trying to get money from the**
 16 **book publication, correct?**
 17 A Well, I wasn't going to sell it to them
 18 for free.
 19 **Q But you were unsuccessful in finding**
 20 **someone to publish it, correct?**
 21 A Well, I was always on the fence with it.
 22 I wasn't too sure if I wanted to or didn't want to.
 23 I was more seeking judgment based upon these people
 24 who have done this plenty and plenty of times.
 25 Still to this day, I mean, I've had people

1 who have been interested in it and I still don't know
 2 if I want to do it yet. I mean, I think there's a
 3 lot more that can go into it, you know.
 4 **Q You were actively sending the manuscript**
 5 **to people for purposes of having them reach a deal**
 6 **with you and publish it, correct?**
 7 A No deal was ever talked about. What we
 8 talked about was the possibility of publishing it, is
 9 it publishing-worthy, would I need to get a
 10 ghostwriter. You know, this is the first time I've
 11 ever written a manuscript so I didn't know what I was
 12 doing.
 13 **Q Okay. You contacted Jarred Weisfeld,**
 14 **correct?**
 15 A Correct.
 16 **Q I'm going to mark a document as**
 17 **Defendant's Exhibit 16. It is a composite exhibit.**
 18 **(Exhibit 16 marked.)**
 19 MR. EDWARDS: Thank you.
 20 **Q (BY MS. MENNINGER) I'm not going to ask**
 21 **you to read every single page of this, but if you**
 22 **look at the first page.**
 23 A Um-hum.
 24 **Q Can you tell what this is in terms of what**
 25 **type of document?**

1 A It's an e-mail from me to Jarred.
 2 **Q Okay. And there's also e-mails from**
 3 **Jarred to you on the same page, correct?**
 4 A Yes.
 5 **Q And can you tell -- I just presume that**
 6 **you know that you have turned over documents in this**
 7 **case; is that true?**
 8 A Yes.
 9 **Q All right. And do you see at the bottom**
 10 **it's got your name and some page numbers in the**
 11 **bottom right-hand corner?**
 12 A Giuffre 003529?
 13 **Q Right.**
 14 A Yes.
 15 **Q So you understood that your lawyers sought**
 16 **from you e-mails, for example?**
 17 A Yes.
 18 **Q And searched your computer, correct?**
 19 A Correct.
 20 **Q And printed out e-mails, correct?**
 21 A Yes.
 22 **Q And these look like some of the e-mails?**
 23 A Yes.
 24 **Q Okay. Do you have any reason to believe**
 25 **that e-mails produced by your lawyers with your name**

1 on the e-mail address line are anything other than
 2 your e-mail?
 3 A No, they're my e-mails.
 4 Q Okay. Did anyone else use your e-mail
 5 account?
 6 A No.
 7 Q Okay.
 8 A I mean, well, my husband uses it
 9 sometimes. My kids use it for games.
 10 Q Okay.
 11 A But that's about it.
 12 Q So if an e-mail is signed XOXO Jenna --
 13 A Yes.
 14 Q -- is that you?
 15 A Correct.
 16 Q All right. And do you believe anyone else
 17 in your family was communicating with
 18 [REDACTED]?
 19 A No, no one else.
 20 Q All right. What was the purpose of you
 21 communicating with Jarred?
 22 A We were trying to figure out if my book
 23 was -- my manuscript was ever published or
 24 publishable. And this was at a time where there was
 25 a lot of controversy about what's going on around JE.

1 And when I say JE, I mean Jeffrey Epstein.
 2 It was a very scary thing for a lot of publishers to
 3 even consider taking it on because Jeffrey is a very
 4 powerful person.
 5 Q Did you send your manuscript to Jarred?
 6 A I believe I did.
 7 Q All right. Did you ask Jarred to send it
 8 on to other people like Tony?
 9 MR. EDWARDS: Object to the form.
 10 A I can't -- I can't recall. I believe I
 11 met Tony through Jarred.
 12 Q (BY MS. MENNINGER) Okay. I'm going to
 13 ask you to turn -- well, on the first page, the
 14 second e-mail says, is Epstein too big for Tony?
 15 Does that refresh your recollection that
 16 Jarred and Tony had something to do with one another?
 17 A Yes.
 18 Q Okay. And on the second page in the
 19 middle of the page, just to be clear, is that an
 20 indication that, Tony definitely does not want the
 21 book, XOXO Jenna.
 22 Is that what you wrote?
 23 A Yes.
 24 Q And these first e-mails are in 2000 --
 25 July of 2012, correct?

1 A Yes.
 2 MR. EDWARDS: I object just to the
 3 apparent mischaracterization.
 4 MS. MENNINGER: Of 2012?
 5 MR. EDWARDS: Being the first e-mails.
 6 MS. MENNINGER: I only meant the first
 7 pages of this composite exhibit.
 8 MR. EDWARDS: Okay.
 9 MS. MENNINGER: But I appreciate your
 10 clarification.
 11 MR. EDWARDS: Okay.
 12 Q (BY MS. MENNINGER) The first e-mails of
 13 this composite exhibit are dated July of 2012,
 14 correct?
 15 A Correct.
 16 MR. EDWARDS: The first page. As opposed
 17 to the first in the chronological timeline.
 18 MS. MENNINGER: Yes.
 19 MR. EDWARDS: Okay.
 20 Q (BY MS. MENNINGER) If you flip sort of
 21 anywhere towards the back, can you also see that
 22 you -- there are e-mails between yourself and Jarred
 23 in 2011?
 24 A Excuse me. And which page?
 25 Q Really, you can take your pick anywhere

1 from the back of that exhibit?
 2 A Yeah, yeah, I see what you're talking
 3 about.
 4 Q Here. Why don't I direct you to the
 5 bottom right is Giuffre 3563. Now, it's going to be
 6 a little tricky to find, but it's about eight
 7 pages -- I'm sorry, six pages from the back of the
 8 composite exhibit.
 9 A Yes.
 10 Q Do you see on that page an e-mail from
 11 yourself to Jarred from June 7th of 2011?
 12 A Yes.
 13 Q And in that e-mail you write: Dear Jarred
 14 Weisfeld, We spoke on the phone going back a couple
 15 months regarding the story I am writing called, The
 16 Billionaires Playboy Club.
 17 Right?
 18 A Correct.
 19 Q I am no longer under any contract and
 20 would like to ask you to review my synopsis and if
 21 you are interested I would love for you to represent
 22 me as my literary agent.
 23 Correct?
 24 A Correct.
 25 Q I've included some of the press that has

Page 257	Page 259
1 covered the ongoing case of Jeffrey Epstein, the 2 world's richest pedophile. And my good friend and 3 journalist Sharon Churcher has a few from her 4 articles that she has written to send to you as well. 5 Correct? 6 A Correct. 7 Q I am very serious about getting my book 8 published and believe this story will cover many 9 genres of interest, not only by those following the 10 lengthy case, but it is also a woman's story of 11 glitz, glamour, sorrow, compassion, and true love. I 12 hope you enjoy. 13 Correct? 14 A Correct. 15 Q Signed, yourself? 16 A Yes. 17 Q So in about June you sent to Jarred 18 Weisfeld a synopsis and were asking him to represent 19 you as your literary agent to sell the book, correct? 20 A Yes. 21 Q And you characterized Sharon Churcher as 22 your good friend, correct? 23 A Well, at that time -- you have to 24 understand, Jarred and Sharon are very close. Sharon 25 is the one who introduced me to Jarred. And that's	1 one? All right. 2 MR. EDWARDS: What are we on now, 17? 3 MS. MENNINGER: 17. 4 (Exhibit 17 marked.) 5 Q (BY MS. MENNINGER) Very similarly, can 6 you take a look at this exhibit? It is a composite 7 of documents produced by your attorneys with various 8 Bates ranges, Bates numbers in between Giuffre 2750 9 and 3928. 10 A 2750 and -- 11 Q I think -- I think the last page is 3927, 12 but it does not contain all of -- I'm sorry, 3928. 13 But it does not contain all of the pages in between, 14 just to let you know. 15 A Okay. Is there one specific that you want 16 me to look at? 17 Q No, if you can just take a look at the 18 first page. 19 A Okay. 20 Q And tell me if you know who this person 21 is? 22 A Paulo Silva is somebody who works for the 23 Mail On Sunday. And he was the one in charge of 24 paying me. 25 Q Paying you for what?
Page 258	Page 260
1 just being nice. 2 Q Do you disagree that Sharon Churcher was 3 your good friend at that time? 4 A Well, at that time I did trust her a lot 5 more than what I do now. 6 Q Why did you change your opinion of Sharon 7 Churcher? 8 A You know, I -- I just -- I think -- I 9 think talking to some journalists can be very 10 dangerous, especially sometimes how words can get 11 taken out of context. And I'm not saying that she's 12 a bad person. I'm just saying that just, I wouldn't 13 call her up and ask her what she's cooking for dinner 14 tonight or how the family is doing. 15 Q Did you ever introduce her to your hair 16 stylist? 17 A No. 18 Q All right. 19 A Oh, actually, yes, I did. She did get a 20 haircut where I was at. 21 Q All right. 22 MS. MENNINGER: So if I could have the 23 e-mails with Paulo Silva, please. I'm going to mark 24 these Defendant's Exhibit -- 18 -- 17. 25 Oh, I don't know if that's -- is that just	1 A The 140 plus the 10 and the 10. 2 Q Okay. And did he also pay you on an 3 ongoing basis for further sales of the photograph of 4 yourself and Prince Andrew? 5 A No, it was a set fee of 140 plus the 10 6 and 10. But they broke it up for some reason. So as 7 you can see here, Thanks for transferring the money. 8 I will let you know when it reaches my bank account 9 but just a little bit confused as I have a previous 10 e-mail with the amount owed at 4100. Is there still 11 an outstanding amount yet to be paid. 12 So they broke it up into quite a lot of 13 different fractions but it still equaled the 140 plus 14 the 10 and the 10. 15 Q Okay. If I could ask you to flip back to 16 Giuffre 2758. They're in sequential order, so it 17 should be about eight pages back. 18 A Yes. 19 Q All right. Do you see -- do you see that 20 that's an e-mail from Paulo Silva to your e-mail 21 account? 22 A Yes. 23 Q On or about March 28th, 2011? 24 A Yes. 25 Q All right. And it appears to be his

1 **introductory e-mail to you. Is that a fair**
2 **characterization of it?**

3 A It would be hard to say. Like, I'd have
4 to look at the first one. That's June 24th. This is
5 March 28th. I suppose so, if he's introducing
6 himself as Paulo Silva.

7 **Q All right. And in this e-mail he**
8 **introduces himself by name and tells you that he**
9 **works for Solo Syndication and represents they are**
10 **the official syndication agency for Daily Mail and**
11 **Mail On Sunday and that he's been overseeing the**
12 **syndication of your image, correct?**

13 A Correct.

14 **Q All right. And then he tells you that**
15 **with regard to your image with Prince Andrew he can**
16 **confirm that they've been able to sell it frequently**
17 **over the last couple of weeks. And he listed the**
18 **names of various news agencies to whom they had sold**
19 **the image, correct?**

20 A Correct.

21 **Q And then he tells you what the sales were**
22 **as of last Friday and then what your share of it is,**
23 **correct?**

24 A Correct.

25 **Q And your share of it was approximately**

1 **half of whatever the sales were, correct?**

2 A Yes, it looks that way.

3 **Q All right. And so then he gave you their**
4 **general payment terms, correct?**

5 A (Deponent perused document.)
6 Yes. Yep.

7 **Q And is that syndication deal separate and**
8 **apart from your deal with the Mail On Sunday to get**
9 **paid for the stories and a chunk --**

10 A Yes.

11 **Q -- for the image?**

12 A So I will have to correct my previous
13 statement.

14 **Q Okay.**

15 A So I forgot completely about the fact that
16 I received 4,487.50 for -- for the pictures that got
17 sold.

18 **Q And is it possible it was sold some more**
19 **after this date, for which you received some money,**
20 **correct?**

21 A I don't believe so. I -- I didn't even
22 remember this one, to be honest. So if there's any
23 others that you can show me, I'd be happy to look at
24 them.

25 **Q Well, I'm just asking you if you remember**

1 **what the terms of your agreement were with this**
2 **syndication, Solo Syndication?**

3 A Well, like you said, it looks like half
4 of --

5 In regards to your image with Prince
6 Andrew, I can confirm we've been able to sell it
7 quite frequently over the last few weeks. So far
8 we've been able to sell it to the following clients.
9 It lists names.

10 So far the total sales, as of last Friday,
11 is the number listed there.

12 Therefore, your share is 4,487.

13 **Q So let me be clear. I guess I'm asking,**
14 **do -- do you recall what your deal was with Solo**
15 **Syndication?**

16 A No, I do not recall it. I just remember
17 Sharon writing up the contract saying 140 plus the 10
18 and the 10. I completely forgot about the
19 syndication for \$4,000 and 487 cents (sic).

20 **Q Okay. I'm going to ask you to turn back**
21 **to 2754.**

22 A 2754?

23 **Q Correct.**

24 A Okay.

25 **Q And it's a document with the heading Solo**

1 **Syndication Limited. Is that the right page you're**
2 **on?**

3 A Yes.

4 **Q Dated May 23rd, 2011, correct?**

5 A Yes.

6 **Q All right. And there's some handwriting**
7 **in the middle of the page towards the bottom.**

8 A Not my handwriting.

9 **Q It's not your handwriting?**

10 A No.

11 **Q Do you know whose it is?**

12 A No.

13 **Q All right.**

14 A I don't even know what it says. Does it
15 say Chai canceled and something mode? I have no idea
16 what it even says.

17 **Q Okay. And it's not your handwriting?**

18 A No.

19 **Q It was produced by your attorneys,**
20 **correct?**

21 A I'm sorry?

22 **Q It was produced to us by your attorneys,**
23 **correct?**

24 A Yes. They went through and gave you guys
25 everything you asked for.

1 **Q All right. Since these e-mails come from**
 2 **your e-mail address to and from Paulo Silva, do you**
 3 **have any reason to doubt that they are your e-mails?**

4 A I have no reason to doubt.

5 **Q All right. Do you recall a Sandra White?**

6 A Yes. She was a possible ghostwriter that
 7 I was going to use. Sharon recommended that I got a
 8 ghostwriter to be involved. And we nearly settled on
 9 some kind of agreement, but I wasn't really happy
 10 with the agreement in the end, so I decided not to
 11 use her.

12 **Q You weren't happy with the terms of her**
 13 **price, if you will?**

14 A Yes.

15 **Q And so you didn't come to an agreement**
 16 **with her, correct?**

17 A We nearly did, but we in the end did not.

18 **Q All right. If I can show you Defendant's**
 19 **Exhibit -- whew -- 18.**

20 MR. EDWARDS: You did kill a tree there.

21 **Q (BY MS. MENNINGER) Take a look at that.**
 22 **(Exhibit 18 marked.)**

23 THE DEPONENT: So put this one away?

24 MR. EDWARDS: Put these in some sort of
 25 order. They don't have to be perfect, but just so

1 you know what you're looking at.

2 This is 18?

3 **Q (BY MS. MENNINGER) All right. Again, do**
 4 **you recognize that the e-mail address --**

5 A Is mine.

6 **Q -- is yours and it's from and to Sandra**
 7 **White, correct?**

8 A Correct.

9 **Q And the date is in or around May 25th,**
 10 **June 5th, something like that?**

11 A It's Australian so it's backwards. So
 12 it's the 6th of May, 2011.

13 **Q Well, I would have thought that except the**
 14 **bottom e-mail is May 24th, the middle one is May 25th**
 15 **and then the most recent one says 6/5. So I don't --**
 16 **I don't know. I didn't write the document.**

17 A Yeah.

18 **Q But I'm asking if you believe it was in or**
 19 **around the end of May?**

20 A The only reason I can tell you that is
 21 because if you look here, 24/5/11 is the way that we
 22 actually do our dates in Australia, whereas in
 23 America you would do 5/24/11.

24 So right here where it's written makes it
 25 nice and clear but just to be clear, the dates are

1 backwards.

2 **Q Right. So if an e-mail is responding to**
 3 **May 25th, is it more or less likely that it was**
 4 **written on June 5th or May 6th?**

5 MR. EDWARDS: Object to the form.

6 A I would say May 6th.

7 **Q (BY MS. MENNINGER) So when responded to a**
 8 **May 25th --**

9 A Oh, no, you're right. No, I'm sorry, I'm
 10 going backwards because it's going up, isn't it?
 11 Okay. Yes.

12 **Q All right.**

13 A I'm confused, too.

14 **Q Anyway. In the last e-mail it says: I'm**
 15 **very sad we won't be able to work together as I've**
 16 **been very excited about the project. As you know, I**
 17 **do not sell synopsis or individual chapters, and**
 18 **especially not for those amounts. I'm merely**
 19 **intrigued about where you were getting advice from.**
 20 **Rest assured what we have worked on is confidential.**
 21 **If you change your mind, let me know.**

22 **So that was around June 5th?**

23 A 2011.

24 **Q 2011, right?**

25 A Yes.

1 **Q All right. So you had been trying to**
 2 **reach an agreement with Sandra White prior to**
 3 **June 5th?**

4 A Correct.

5 **Q And were unable to do so?**

6 A Yes.

7 **Q And not that you need to read every page,**
 8 **but is it fair to say that you exchanged some**
 9 **portions of your synopsis with Sandra during the**
 10 **course of your interactions with her?**

11 A Yes. And she rewrote some portion of it
 12 as well, which I don't even know, it might be in
 13 here. It might not be in here. I don't know what
 14 I've kept or not kept.

15 **Q Okay. And did you get advice from Sharon**
 16 **Churcher with respect to the terms upon which you**
 17 **should be looking for the ghostwriting agreement?**

18 A Sharon is the one who introduced me to
 19 Sandra. I can't remember who was giving me the
 20 advice. It's going back so long ago, you know, I
 21 don't want to pinpoint somebody and say it was
 22 definitely them if it wasn't.

23 So, yeah, I'm just not going to comment on
 24 that one without knowing.

25 **Q Okay. You probably have e-mails, though,**

1 **do you think, perhaps?**
2 A I haven't seen these e-mails since 2011.
3 So --
4 **Q Okay. I'm going to show you Defendant's**
5 **Exhibit 19.**
6 **(Exhibit 19 marked.)**
7 **Q (BY MS. MENNINGER) Who is Marianne**
8 **Strong?**
9 A She's my literary agent.
10 **Q All right. And can you identify**
11 **Defendant's Exhibit 19?**
12 A I'm sorry?
13 **Q Can you identify what Defendant's**
14 **Exhibit 19 is?**
15 A Defendant's Exhibit 19, like the number at
16 the bottom?
17 **Q No, do you know what kind of document this**
18 **is?**
19 A Oh, it's an e-mail from me to Marianne
20 Strong.
21 **Q All right. And at roughly what time**
22 **frame?**
23 A February 20th, 2014.
24 **Q All right. And what were you speaking**
25 **with Marianne or writing with Marianne Strong about?**

1 A Can I just read it real quick and I'll
2 tell you?
3 **Q Sure.**
4 **(Pause.)**
5 A Sure.
6 **Q Do you remember now the topic upon which**
7 **you and Marianne Strong were exchanging**
8 **communication?**
9 A I don't recall talking about Lord Colin
10 Campbell or the Duke of Argyll or Colin. And Lord
11 Colin is Scottish. I don't know who Emily is. But I
12 do understand what she's saying. If I win, then my
13 story would be a much better story to write.
14 **Q And what case was she referring to, if you**
15 **know?**
16 A I think this was regarding probably the
17 time when I was in -- trying to get involved with the
18 CVRA case.
19 **Q In February of 2014?**
20 A Correct.
21 **Q Okay. And at the bottom of the page**
22 **there's an e-mail from you to her, correct?**
23 A I haven't read that part yet. Give me one
24 moment.
25 **Q Yeah.**

1 A Thank you.
2 So it cuts off after that, does it?
3 **Q Um-hum.**
4 A Oh, sorry. (Pause.)
5 Yep, I've read it.
6 **Q All right. Do you remember that e-mail**
7 **now?**
8 A It's going back a long time ago, but it's
9 definitely my kind of writing.
10 **Q Okay. So in the -- on the bottom of the**
11 **first page, 3417 --**
12 A Um-hum.
13 **Q -- you represented to Marianne Strong that**
14 **you had served four years as Jeffrey Epstein's**
15 **personal and abused sex slave, correct?**
16 A Correct.
17 **Q That is not true, correct?**
18 A Since we have now found out the actual
19 dates, it is not correct.
20 **Q Okay. I want to turn the page, the second**
21 **page. On the first line, the first full sentence**
22 **that begins on the first line:**
23 **Even though there is over 40 women that**
24 **were once vulnerable girls that looked like the sweet**
25 **girl next door but now that they have been taken**

1 **advantage of by this disgusting Wall Street tyrant,**
2 **most of them have led a very unhealthy lifestyle**
3 **since having served Jeffrey, such as drug addictions**
4 **and prostitution and do not hold accreditation to**
5 **talk.**
6 **You wrote that, correct?**
7 A Correct.
8 **Q Who are the 40 women that you are talking**
9 **about here?**
10 A When I spoke to the FBI, they told me that
11 there were -- and this is maybe just a guesstimate,
12 maybe there was more, maybe there was less that they
13 said. But they had told me that there was a lot of
14 other victims involved in this case. And this is
15 when I believed that after the FBI came to see me
16 that they were willing to reopen the case and do
17 something about it.
18 **Q Okay. So the FBI is the one that told you**
19 **that there were 40 women?**
20 A It could be less than 40. It could be
21 more than 40. I think I just summed it up to 40.
22 **Q You came up with 40?**
23 A Well, I didn't just come out with 40. I
24 think it was around that number. It could be 46. It
25 could be 39. I'm not too sure to be exact.

1 **Q All right. But you based it on --**
2 A On my speaking --
3 **Q -- what?**
4 A -- with the FBI.
5 **Q Okay. And --**
6 MR. EDWARDS: Just let her finish her
7 question before you answer.
8 THE DEPONENT: Okay.
9 MR. EDWARDS: I just want the record
10 clear.
11 **Q (BY MS. MENNINGER) Who at the FBI did you**
12 **speak with?**
13 A I can't think of his name. I spoke to --
14 oh, God, I can't even think of his name right now. I
15 spoke to a male and a female. And I also spoke to
16 Marie Villafana about everything that was happening.
17 **Q Is it Jason Richards?**
18 A Jason Richards, yes.
19 **Q Did Jason Richards tell you that the FBI**
20 **was reopening their case?**
21 A He wanted to reopen the case. And the
22 last conversation that I had with him, I can't
23 remember when it was, he said that he was having
24 trouble doing it from the people above him.
25 **Q Okay. When was that?**

1 A Like I said, I don't know.
2 **Q Was it like a year ago or two years ago or**
3 **three years ago?**
4 A I don't remember the last time I talked to
5 him. I think I was in Florida the last time I spoke
6 to him.
7 **Q And was that on the phone or in person?**
8 A On the phone.
9 **Q Hmm?**
10 A On the phone.
11 **Q On the phone. Where was he located, if**
12 **you know, when you spoke to him?**
13 A I don't know.
14 **Q Do you have his phone number?**
15 A I have his card somewhere. Probably not
16 on me anymore. Like I told you, my paper trail is
17 (indicating).
18 **Q Okay. So in the fourth line you say:**
19 **Miraculously since I came to light with the truth in**
20 **speaking out against him in 2011, the FBI have**
21 **reopened the case. Which as you know, has current**
22 **proceedings in which I am involved in.**
23 **So what current proceeding were you**
24 **involved in on February 19th, 2014?**
25 A Well, just speaking with the FBI, I was in

1 the assumption that the case was being reopened, that
2 they still were investigating.
3 **Q Okay. Did you believe that the FBI had**
4 **reopened their case in 2011?**
5 A I believe that's when they first started
6 to reinvestigate and reopen it.
7 **Q And then sometime when you were in Florida**
8 **Jason Richards told you that they were not actually**
9 **going to continue investigating the case?**
10 A I believe I was in Florida, yes. And he
11 didn't say that -- he just said his hands were tied
12 and up above, I don't know, chain of command, it
13 just -- it didn't look like it was going anywhere.
14 There was no definite no and a definite yes. It was
15 just, right now there's really nothing that we can
16 do.
17 **Q All right. In the third paragraph from**
18 **the top, you said there's another major paper that**
19 **has followed the story for a while that has worked**
20 **with me before and they were asking you for the**
21 **exclusive story but updated and obviously the end**
22 **outcome from the judicial decision.**
23 **Who was the other major paper that had**
24 **followed the story for a while and was asking you for**
25 **an exclusive story?**

1 A That would -- that, just coming to mind
2 must be the Daily Mail. If I said I've worked with
3 them before, the only other -- the only other, what
4 do you call them, press, that I had worked with was
5 the Daily Mail, so --
6 **Q Okay. But you said you had held out on**
7 **them because Marianne had told you about her contact**
8 **with Emily at the New York City Post, right?**
9 A I have held out because you told me about
10 your contact with Emily with the New York Post, and I
11 appreciate you trying to make big headlines for the
12 story and hopefully one day the book. Yes.
13 **Q Okay. And then the last line of that**
14 **paragraph you say: I would also like to know that**
15 **I'm going to profit from this as well, correct?**
16 A Correct. I'm not going to give it for
17 free.
18 **Q Right. All right.**
19 **(Exhibit 20 marked.)**
20 MS. MENNINGER: Defendant's Exhibit 20.
21 **Q (BY MS. MENNINGER) Do you recognize these**
22 **documents -- this document, which is another**
23 **composite exhibit?**
24 A Yes.
25 **Q Do you recognize it?**

1 A Oh, like I said, I don't recognize it, but
 2 it obviously comes from --
 3 **Q Your e-mail address?**
 4 A Yes.
 5 **Q Now, what e-mail address is that, exactly,**
 6 **on the first page of this exhibit?**
 7 A @icloud.com, that must be from a phone.
 8 **Q So that's different from the other e-mail**
 9 **address?**
 10 A Yeah, I don't actually know about that
 11 e-mail address. I obviously used it. It has my
 12 husband's name on it, Robert Giuffre.
 13 **Q And is the e-mail signed by your husband?**
 14 A No, it's signed by me.
 15 **Q Okay. And in the subject line you wrote**
 16 **Virginia Roberts (Jane Doe 102), correct?**
 17 A Subject line?
 18 **Q The very top line of that page.**
 19 A Oh, yeah, I see.
 20 **Q Okay. And it was to**
 21 **jason.richards2@ic.fbi.gov, correct?**
 22 A Correct.
 23 **Q And is that Jason Richards we were just**
 24 **referring to?**
 25 A Yes.

1 **Q All right. And you had some e-mails with**
 2 **Jason Richards over time; is that fair?**
 3 A Sure.
 4 **Q These ones that came from your computer,**
 5 **right?**
 6 A Sure, yes.
 7 **Q Okay. You talk about having spoken with**
 8 **Judge Paul Cassell in this first page, correct?**
 9 A I am here to get this BS non-prosecution
 10 agreement thrown out and speaking with Judge Paul
 11 Cassal (sic). He suggested trying to get ahold of
 12 any photos or video recordings released by the FBI to
 13 assist our case further in providing (sic) how much
 14 pedophilia occurred by Jeffrey and the many other
 15 monsters he obliged with underage girls.
 16 **Q Okay.**
 17 A If this is a possibility, please let me
 18 know so I can give you Brad Edwards (my attorney) his
 19 contact details. Many thanks for your time and I
 20 hope we should meet again.
 21 **Q Okay. And so you were going back to Jason**
 22 **and trying to get any evidence that the FBI had about**
 23 **your case, right?**
 24 A Correct. Any photographs pertaining to
 25 what -- myself, not of anyone else.

1 **Q Right.**
 2 A But anything they had of me.
 3 **Q And Brad Edwards, who is sitting right**
 4 **here, was your attorney at the time and you**
 5 **identified him as such in the e-mail, correct?**
 6 A Correct.
 7 **Q You did not identify Mr. -- Judge Cassell**
 8 **as your attorney in this e-mail, correct?**
 9 A I knew him as a former judge, and I just
 10 wrote down, Judge Paul Cassal (sic) as it looks. But
 11 he was my attorney -- I don't know if he was my
 12 attorney at that time. But yes -- he's always --
 13 he's been with me since the beginning, so --
 14 **Q So he's representing you in this case now,**
 15 **correct?**
 16 A Yes.
 17 **Q But at that time you don't know if he was**
 18 **your attorney?**
 19 A I think he was. I mean, I've been talking
 20 with him since the beginning. And this is dated
 21 2014. So I believe at this time he was my attorney
 22 at the time as well.
 23 **Q Okay. When do you recall first speaking**
 24 **with him?**
 25 A Speaking with Paul, I'm not too sure. I

1 can't remember if I spoke to Paul in the phone in
 2 Australia or if I met him in person in Florida.
 3 **Q Do you remember when you signed any kind**
 4 **of fee agreement with him?**
 5 MR. EDWARDS: Object to the form.
 6 A Um, the -- well, the first time I would
 7 have signed an agreement would have been in Florida.
 8 **Q (BY MS. MENNINGER) When you were living**
 9 **in Titusville?**
 10 A As far as my knowledge reminds me. I
 11 mean, I'm looking at e-mails that I can't even
 12 remember sending. It's a possibility I could have
 13 signed earlier, but as far as I remember.
 14 **Q Okay. Do you recall ever having e-mail**
 15 **communications with Sharon Churcher about her**
 16 **publishing the first serial of your book?**
 17 A Serial, what does that mean? I'm sorry.
 18 **Q Like a sequel.**
 19 A A sequel to my book?
 20 **Q Um-hum.**
 21 A My book has never been published.
 22 **Q Right. Do you remember ever e-mailing**
 23 **with Sharon about her being the one who would publish**
 24 **any subsequent follow-up book?**
 25 A If you have something in front of you to

1 see and show me I would look at it. Like I said,
 2 there's a million e-mails here. I mean, there's a
 3 whole dead tree with e-mails I don't remember
 4 sending. So --
 5 **Q So you don't remember that e-mail chain,**
 6 **as you sit here?**
 7 A Yes.
 8 **Q Okay. You have signed contingency fee**
 9 **agreements with Boies, Schiller, correct?**
 10 A Yes.
 11 **Q You've signed contingency fees with**
 12 **Mr. Cassell, correct?**
 13 A Correct.
 14 **Q Mr. Edwards and his firm?**
 15 A Correct.
 16 **Q Stan Pottinger; is that correct?**
 17 A Correct.
 18 **Q And pursuant to those fee agreements you**
 19 **understand that you would get a recovery of any money**
 20 **that you won in this case, correct?**
 21 A Correct.
 22 **Q And what percent is that?**
 23 A I don't know off the top of my head. I
 24 think it's 40 percent. I'm not too sure, to be
 25 honest.

1 **Q Do you remember having any conversations**
 2 **with Rebecca Boylan about money that you hoped to**
 3 **obtain from this case or from any other source**
 4 **related to this?**
 5 A I remember talking to Rebecca Boylan as a
 6 girlfriend telling her what cases I was involved
 7 with. I don't believe we ever spoke about any
 8 monetary settlements. There was no number that was
 9 ever mentioned. I told her that I was involved in
 10 these cases. And, you know, it was just girlfriend
 11 talk between girlfriends. I never expected her to
 12 turn around and consort with the enemy.
 13 **Q Well, it's fair to say you do hope to make**
 14 **money from bringing this lawsuit, correct?**
 15 MR. EDWARDS: Form.
 16 A I hope to win, but that's not the only
 17 reason I want to win. I want to see justice come
 18 through.
 19 **Q (BY MS. MENNINGER) Is money one of the**
 20 **reasons you want to win?**
 21 MR. EDWARDS: Same objection.
 22 A More than the money, I want to see
 23 Ghislaine and Jeffrey own up to what they have done
 24 and pay for the price, yes.
 25 **Q (BY MS. MENNINGER) Is money tight in your**

1 **family?**
 2 A We've been doing well.
 3 **Q You've been doing well?**
 4 A Yes.
 5 **Q What is your source of income right now?**
 6 A My husband is the main income -- he's the
 7 breadwinner and I'm a stay-at-home mom.
 8 **Q And what is his job?**
 9 A [REDACTED]
 10 [REDACTED]
 11 [REDACTED].
 12 **Q And how long has he had that job?**
 13 A He got that job, I believe, in December or
 14 January. December 2015 or January 2016. I know he
 15 got the job and then we had to go through all these
 16 preliminary tests and everything to make sure you
 17 qualify. So --
 18 **Q And what is the last paid employment that**
 19 **you had?**
 20 A The last paid employment that I had was --
 21 there was that -- do you remember going back through
 22 the e-mails where I had that resume and I sent it and
 23 they said, What time do you want to come for an
 24 interview?
 25 I ended up getting the job there for two

1 days because the place was disgusting and the boss
 2 was just horrible.
 3 I didn't get paid from them, but I got
 4 employed by them. And other than that, the last time
 5 I worked was in -- ended in 2006 for ET Australia.
 6 **Q Did you quit that job after two days**
 7 **because the place was disgusting?**
 8 A It was vile. Okay. They had the -- the
 9 whole place was closed down. The restaurant was
 10 closed down for a period of, like, six months. And
 11 he wanted me to go into this freezer area that had a
 12 dead rat in it and like this thick (indicating) layer
 13 of mold at the bottom. And he wanted me to clean it.
 14 **Q All right.**
 15 A And I was just like, No.
 16 **Q Just checking, did you quit or did he fire**
 17 **you?**
 18 A No, I definitely walked out of that one,
 19 hands up.
 20 **Q Okay. I'm going to do one more document I**
 21 **have, quickly.**
 22 **(Exhibit 21 marked.)**
 23 **Q (BY MS. MENNINGER) I'll show you**
 24 **Defendant's Exhibit 21, another composite exhibit.**
 25 **Do you recognize the to and froms on this e-mail?**

Page 285	Page 287
1 A To Sharon Churcher from myself, yes. 2 Q And this is the Sharon Churcher from Mail 3 On Sunday we were discussing earlier? 4 A That's correct. 5 Q And these are from February of 2011, 6 correct? 7 A Yes. 8 Q Okay. 9 A I mean, it's just assuming that we're not 10 looking at Australian backwards dates. 11 Q Okay. Well, a few pages back, where it 12 says 2/19/2011. 13 A Oh, yeah, yeah. 14 Q All right. If I could direct your 15 attention to one of the pages, it's 3676 in the lower 16 right-hand corner. 17 A 3676. 18 Q Now, these are in sequential order. 19 They're not in Bates stamp order so you might have to 20 look at the dates on the top to find one that's 21 February 19th of 2011. 22 THE DEPONENT: Do you know which page it 23 is? 24 MR. EDWARDS: Well -- 25 MS. MENNINGER: It's almost in the middle.	1 Supposedly JE purchased her at age 14 from her 2 family. 3 Q Okay. And then you asked her to call to 4 discuss that, correct? 5 A I tried to call. The line was busy. 6 Could you call concerning the question you asked? 7 Q Right. 8 A Yes. 9 Q All right. Defendant's Exhibit 22. 10 (Exhibit 22 marked.) 11 THE DEPONENT: Thank you. 12 Q (BY MS. MENNINGER) Okay. Do you 13 recognize these series of e-mails? 14 A So far. I mean, it's definitely from me 15 to her. Or actually, Michael Thomas is the 16 photographer that worked with her, just to be clear. 17 Q And is she one of the two -- the 18 recipients of the first-page e-mail? You and she 19 received an e-mail from Michael Thomas; is that 20 right? 21 A Yes. 22 Q Okay. 23 MR. EDWARDS: I think she wants you to 24 look and make sure you recognize them. 25 Q (BY MS. MENNINGER) Yeah, do you recognize
Page 286	Page 288
1 MR. EDWARDS: It's like what she's saying 2 is that -- 3 MS. MENNINGER: If you look at the date at 4 the top -- 5 MR. EDWARDS: If you look at the top it 6 says 2/19/2011. That's not it. It's like half a 7 page. Keep going. 8 A 2/13, 2/17, 2/18, 2/19 -- 2/19/2011. 9 Q (BY MS. MENNINGER) If it says 3676 in the 10 lower right-hand corner? 11 A Yes. 12 Q Okay. Is that an e-mail that you sent to 13 Sharon Churcher in response to an e-mail that Sharon 14 Churcher sent to you? 15 A To Sharon Churcher from Jenna, Subject 16 R-E, received, yes. 17 I tried to call the line was busy. Could 18 you call concerning the question you asked? 19 Q All right. And that was in response to an 20 e-mail just below it you received from Sharon 21 Churcher, correct? 22 A Yes. 23 Q And what did Sharon Churcher write to you 24 on February 19th of 2011? 25 A Do you know a Nadia Marcinkova?	1 the document, the e-mails? 2 A Like I said, these are back in 2011, but 3 it's from my e-mail address. I recognize that. I 4 recognize Sharon's name and I recognize Michael 5 Thomas. 6 Q Do you have any reason to doubt that the 7 e-mails from March of 2011 -- 8 A I don't have any -- 9 Q -- from yourself and Ms. Churcher are 10 accurately reflected from the documents taken from 11 your computer here? 12 A I have no reason to doubt that. 13 Q Okay. 14 (Exhibit 23 marked.) 15 Q (BY MS. MENNINGER) Defendant's 16 Exhibit 23. Again, e-mails between your e-mail 17 address and Sharon Churcher from May of 2011. 18 Do you recognize your e-mail address? 19 A Yes. 20 Q And Sharon Churcher's e-mail address? 21 A Yes. 22 Q And you're signing your e-mails to her, 23 Much love, XOXO Jenna. And she's signing her e-mails 24 to you, Love Shaza, correct? 25 A Correct.

1 **Q And Shaza is a name that you call her?**
2 A In Australia we kind of shorten the names
3 of people and put z-a on the end, so yes.
4 **Q So she became Shaza?**
5 A She became Shaza, correct.
6 **Q And do you recall having e-mail**
7 **communications with her in which you referred to her**
8 **as Shaza and --**
9 A Yes.
10 **Q -- she referred to herself as Shaza?**
11 A She's the same person we're talking about,
12 yes.
13 **Q All right. So it's coming from her e-mail**
14 **address as Sharon Churcher, right?**
15 A Yes.
16 **Q All right. And I think the last --**
17 MR. EDWARDS: Are you at a stopping point?
18 MS. MENNINGER: Almost.
19 MR. EDWARDS: Okay. Okay. I just have to
20 a make a quick call, but I can wait a while so --
21 MS. MENNINGER: I understand. Almost
22 done.
23 MR. EDWARDS: Okay.
24 (Exhibit 24 marked.)
25 **Q (BY MS. MENNINGER) This is Exhibit 24,**

1 **e-mails between yourself and Sharon Churcher from**
2 **June of 2011?**
3 A Um-hum. Yes, sorry.
4 **Q And, again, Shaza and Jenna, Shaza, Jenna,**
5 **Jenna, Shaza, right?**
6 A Yes.
7 **Q And at the bottom of this first page, is**
8 **Sharon Churcher giving you advice regarding the**
9 **purchase by Vanity Fair of your picture with Prince**
10 **Andrew?**
11 A May I have time to read it, please?
12 **Q Please.**
13 A Are we talking about the very bottom one
14 or the one in the kind of middle bottom?
15 **Q The very bottom one.**
16 A I would let VF buy your picture via Brad.
17 The big gamble would be to let him also give them a
18 statement.
19 **Q Right.**
20 A (Deponent perused document, sotto voce.)
21 The reason this is a gamble is Jeffrey
22 knows some of the most powerful people in publishing
23 and, once altered, will inevitably try to scare off
24 potential buyers. But the upside is it should help
25 you get a good agent. I would have Brad use the

1 phrase sex trafficked as that is a heads up about the
2 book revealing more than be printed.
3 **Q All right. So is Sharon Churcher writing**
4 **to you about -- actually, it's cc'd to Brad, correct?**
5 A Yes.
6 **Q And I only use Brad, not his last name**
7 **because it's brad@pathtojustice.com, correct?**
8 A Yes.
9 **Q All right. And that's Brad Edwards, who**
10 **is sitting here, right?**
11 A Yes.
12 **Q All right. And so in the e-mail from**
13 **Sharon Churcher to you regarding whether or not you**
14 **should let Vanity Fair buy your picture, she's also**
15 **recommending in the last line that you should have**
16 **Brad use the phrase sex trafficked, correct?**
17 A If a statement is made, yes. I don't
18 think Vanity Fair ever did, anyway.
19 **Q And the picture that they're talking about**
20 **there is the one with Prince Andrew, correct?**
21 A That's -- yeah, the big one.
22 **Q The one that was previously sold?**
23 A Yes.
24 **Q And Paulo Silva was syndicating that one,**
25 **correct?**

1 A Yes. Yeah.
2 **Q And on that second page there's a**
3 **redaction. Who is -- who is in that redaction?**
4 A I have no idea.
5 **Q You don't know?**
6 A No, I don't know.
7 **Q So who are the two world's most respected**
8 **politicians? [REDACTED] and who?**
9 A I don't know.
10 **Q Do you recall ever telling Sharon Churcher**
11 **that you were trafficked to two of the world's most**
12 **respected politicians, [REDACTED] and somebody**
13 **else?**
14 MR. EDWARDS: Object to form.
15 A Is that her wording? This is from her.
16 So this is her wording.
17 **Q (BY MS. MENNINGER) Right.**
18 A If she considered them to be the world's
19 most respected politicians, that would be her
20 opinion, not mine.
21 **Q Okay. But you received this e-mail and**
22 **responded to it, correct?**
23 A Is the top one above that what I responded
24 to? Sorry. It just confuses me because it goes
25 upwards, doesn't it, not downwards. We're not

1 reading chronologically down, are we?

2 **Q You can probably look at the dates and**
3 **figure it out. I need you to do that, not me?**

4 A Okay the 30th of the fifth, 31st of the
5 fifth, 6th of the first. Right. So I still don't
6 know who she's talking about there.

7 **Q You don't know if you received this**
8 **e-mail?**

9 A No, I received this e-mail, obviously, but
10 I don't know who's redacted there.

11 **Q Okay. And in the e-mail that you**
12 **responded to, you're talking about -- you used B.**
13 **Clinton, correct?**

14 A It does concern me what they could want to
15 write about me considering that B. Clinton walked
16 into VF and threatened them not to write sex
17 trafficking articles about his good friend JE.

18 **Q Right. Does that refresh your memory that**
19 **when you got this e-mail unredacted Bill Clinton was**
20 **included as well as [REDACTED] ?**

21 MR. EDWARDS: Object to the form.

22 **Q (BY MS. MENNINGER) In the line referred**
23 **to as two of the world's most respected politicians?**

24 A It could be. But, again, I would be
25 making an assumption because I don't know who that

1 name is.

2 **Q I don't either.**

3 A Okay.

4 **Q Maybe our lawyers can tell us.**

5 MS. MENNINGER: All right. Last one, and
6 then you can get your break.
7 (Exhibit 25 marked.)

8 **Q (BY MS. MENNINGER) Defendant's**
9 **Exhibit 25. Again, e-mails to and from yourself and**
10 **Sharon Churcher, correct?**

11 A Yes.

12 **Q And in this e-mail, it's dated 4/12/2015**
13 **on the first page of this composite e-mail?**

14 A Yes.

15 **Q She is encouraging you to do a book,**
16 **correct?**

17 A As she has from the beginning, yes.

18 **Q Right. And she suggested a roman a clef.**
19 **Do you know what that means?**

20 A No.

21 **Q On the third page back, she wrote you to**
22 **compliment you about David Boies taking your case,**
23 **correct?**

24 A (Deponent perused document sotto voce.)

25 Just reading about David Boies taking your

1 case. How fantastic, Jenna! Have you asked him how
2 he'd feel about reviving your book? It would be an
3 incredible shame if the other project lifts your
4 story, which it could at least somewhat. Jarred is
5 still very keen to represent you. I'm afraid I
6 screwed you by steering you to Mimi.

7 I just had a great weekend in LA on a
8 celebrity story. Got to go to Rodeo Drive!!!

9 Much love, Shaza.

10 Yes.

11 **Q So she's encouraging you to have David**
12 **Boies also help you in the book writing department,**
13 **right?**

14 MR. EDWARDS: Object to the form.
15 Mischaracterizes the exhibit.

16 A Is the question pending?

17 **Q (BY MS. MENNINGER) Yes.**

18 A She -- yeah, she encouraged me to -- I
19 mean, once she saw that, you know, there was more
20 litigation going on, she thought -- like she says,
21 How fantastic. And up until recently she's still
22 been trying to get me to get the book out.

23 **Q And in May of 2015, do you have -- did you**
24 **have any active agreement to publish your book?**

25 A In May of 2015, no. Jarred wanted to do

1 something again, but his only thing was, he wanted
2 Sharon to be in on it as like a ghostwriter. And I
3 said, Look, Sharon is all well and good, but I don't
4 want a journalist, you know, as they can twist things
5 around writing my story.

6 So he was like, Well, I'm sorry, I don't
7 want to work with you then. And I said, Well, that's
8 fine. No problem.

9 **Q Do you, as you sit here today, have any**
10 **agreement to publish your story in written form?**

11 A No, we have no agreement.

12 **Q Do you have an agreement for anyone else**
13 **to write your story?**

14 A No.

15 **Q Have you got any ghostwriter in the book?**

16 A Besides Sandra, who I didn't like, no.

17 MS. MENNINGER: All right. I think now is
18 a good time for a break. And then --

19 MR. EDWARDS: Okay.

20 THE VIDEOGRAPHER: We are off the record
21 at 4:12.

22 (Recess taken from 4:12 p.m. to 4:22 p.m.)

23 THE VIDEOGRAPHER: We are back on the
24 record at 4:22.

25 **Q (BY MS. MENNINGER) When you were**

e-mailing and speaking with Sharon Churcher in 2011 about the Vanity Fair possibly purchasing your photograph --

A Um-hum.

Q -- do you recall whether you shared with Sharon Churcher anything that you had discussed with your attorney, Mr. Edwards?

A In relationship to what? Like, have I identified people to her?

Q Right.

A Yes.

Q Okay. So you -- you identified people to her and you then looped back to her about your conversations with Mr. Edwards, correct?

MR. EDWARDS: Object to the form.

A I'm sorry, can you rephrase? I don't understand.

Q (BY MS. MENNINGER) All right. So you were e-mailing with her --

A Um-hum.

Q -- getting her advice about whether or not to sell your Prince Andrew picture to Vanity Fair?

A Right.

Q She asked you to run some information by Brad --

A Yes.

Q -- Edwards. And you said that you were going to do that?

A Um-hum.

Q And then you spoke to Mr. Edwards, correct?

A I don't know if I spoke to him or if I e-mailed him.

Q Okay. And then did you report back to Sharon Churcher what you had discussed with Mr. Edwards?

A I'm not too sure. Like I said, going back to the 2011 e-mails, look at this pile here. It's impossible for me to know.

Q So you were having a lot of communications with Sharon Churcher in 2011?

A In 2011, yes.

Q All right. And Mr. Edwards was your attorney in 2011, correct?

A Yes.

Q And did you ever have Sharon Churcher draft for you e-mail to send to Mr. Edwards?

A Yes, I believe -- I believe she did.

Q And why did she draft e-mails for you to send to Mr. Edwards?

A I believe there was -- and this is just going off my recollection.

Q Um-hum.

A I believe there was a time when she was -- oh, God, I can't remember. I really can't remember and don't want to say anything without looking at that exact e-mail. Do you have it to show me?

Q Well, I'm sure it's probably in there but I don't want to take the time to look for it now.

A Okay.

Q So I understand you're just repeating what you recall from your memory.

A Yes.

Q And it may not be accurate because you're not looking at the document. I've got that caveat.

What do you recall, just as you're sitting there?

A I know there was e-mails that Sharon sent to me suggesting to say to Brad Edwards, I know that. I don't remember or recall exactly what was in those statements.

Q Okay. And did you send those e-mails to Mr. Edwards, as you recall today?

A I don't know. I'm sorry.

Q And do you know if you went back to Sharon

Churcher and told her about the conversations or e-mails you had with Mr. Edwards?

A Some of them, I'm sure, yes.

Q Because you were in fairly regular contact with Sharon Churcher at that time, correct?

A Right, at that time.

Q All right. I want to introduce to you Defendant's Exhibit 26.

(Exhibit 26 marked.)

Q (BY MS. MENNINGER) Have you seen this document before?

A I don't know if I've seen this specific document before, but I've seen something close to it, I think.

Q All right. Do you see the date on the document?

A March 10th, 2011.

Q March 9th?

A I see March 10th, sorry.

Q Hmm.

A London, March 10th, 2011.

MR. EDWARDS: Both dates are there.

MS. MENNINGER: I'm sure they are. I'm just not seeing the one that you're seeing.

THE DEPONENT: Oh, I'm sorry.

Page 301

1 MS. MENNINGER: That's okay.
 2 THE DEPONENT: Yeah. Sorry about that.
 3 MS. MENNINGER: Okay.
 4 MR. EDWARDS: One is right on top of the
 5 other.
 6 **Q (BY MS. MENNINGER) I don't doubt you. I**
 7 **was just looking for it.**
 8 A Okay.
 9 **Q All right. So after the word London,**
 10 **March 10th, 2011, correct?**
 11 A Correct.
 12 **Q And above that is a title, Statement on**
 13 **behalf of Ghislaine Maxwell, right?**
 14 A Yes.
 15 **Q By Devonshires Solicitors, PRNE, correct?**
 16 A Correct.
 17 **Q And then Wednesday, March 9th, 2011,**
 18 **correct?**
 19 A Correct.
 20 **Q And you understand that March 9th or**
 21 **March 10th, 2011 is roughly the time your original**
 22 **stories were published in the press --**
 23 A Correct.
 24 **Q -- internationally, correct?**
 25 A Correct.

Page 302

1 **Q And this statement issued by Ghislaine**
 2 **Maxwell or issued by Devonshires Solicitors on her**
 3 **behalf denied allegations about her that have**
 4 **appeared recently in the media, correct?**
 5 A Correct.
 6 **Q It says, These allegations are all**
 7 **entirely false, correct?**
 8 **Did I read that properly?**
 9 A Ghislaine Maxwell denies the various
 10 allegations about her -- oh, yeah, right -- yeah,
 11 right below that. These allegations are entirely
 12 false.
 13 **Q All right. In 2011, were you aware that**
 14 **Ghislaine Maxwell issued a statement denying the**
 15 **allegations about her that had appeared in the media?**
 16 A I'm not too sure what I recall from 2011
 17 about Ghislaine Maxwell denying it. I know that she
 18 denied it recently in 2015. I know that for a fact.
 19 **Q So you don't know whether she denied it in**
 20 **2011?**
 21 A I can't recall back to 2011, if I do
 22 remember that.
 23 **Q And you don't know whether she put out a**
 24 **press statement that said these allegations are all**
 25 **entirely false, correct?**

Page 303

1 A It doesn't surprise me, but I don't
 2 remember reading this. I know that, you know, there
 3 was a lot of stories in press going on and a lot of
 4 them I decided I just didn't want to read. There was
 5 a lot of stuff in there that just, I didn't want to
 6 go through.
 7 **Q Okay. Were you harmed on March 10th or**
 8 **March 11th, 2011 by the issuance of a statement on**
 9 **behalf of Ghislaine Maxwell?**
 10 A I am harmed by Ghislaine Maxwell denying
 11 anything that has ever happened between us, whether
 12 it's in 2002 or 2011 or 2015. I think that she knows
 13 what she did, and she should be held accountable for
 14 them. And not only has she hurt me once, but she's
 15 hurt me apparently twice and now three times.
 16 **Q So on March 11th, 2011, say, how were you**
 17 **harmed by the issuance of this press statement?**
 18 A She's denied that she had any involvement
 19 in the procuring of me and other young girls.
 20 **Q Um-hum.**
 21 A And she tries to make herself look like
 22 she had no partake in it.
 23 **Q Did you suffer any physical symptoms on**
 24 **March 11th, 2011 after this statement was issued, as**
 25 **a consequence of this statement being issued?**

Page 304

1 A Not being able to remember reading this in
 2 2011, it's hard to say. But it's the same thing that
 3 I'm going through right now. I mean, she's denied it
 4 again. And it is painful. It's physically painful.
 5 I am taking medication to help me deal with this.
 6 And --
 7 **Q Okay. I'm just limiting you right now to**
 8 **March of 2011.**
 9 MR. EDWARDS: I would just ask that she's
 10 able to finish her answer, though, please.
 11 MS. MENNINGER: Well, the answer is
 12 nonresponsive, so --
 13 MR. EDWARDS: In your opinion it's not
 14 responsive.
 15 **Q (BY MS. MENNINGER) I want you to**
 16 **understand that the question is related to any**
 17 **physical symptoms you suffered in March of 2011 as a**
 18 **consequence of Defendant's Exhibit 26 being issued.**
 19 A If I would have seen this in March 10th,
 20 2011, this would have been harmful to me.
 21 **Q Okay. Do you recall, as you sit here**
 22 **today, experiencing any physical symptoms as a**
 23 **consequence of Defendant's Exhibit 26 being issued to**
 24 **the press?**
 25 MR. EDWARDS: Objection. Asked and

1 answered. Lacks predicate.

2 A I have been suffering from Ghislaine
3 Maxwell and Jeffrey Epstein since the summer of 2000.
4 So hearing again in 2011 that she's denied it, of
5 course, it's going to hurt me.

6 Did I hear about this in 2011? I can't
7 tell you I honestly have.

8 In 2015 is when I know that she denied it.
9 And again, I haven't stopped suffering from the
10 repercussions that they put me through.

11 **Q (BY MS. MENNINGER) And I'm asking you to**
12 **separate, if you can, any symptoms that you**
13 **experienced anew in March of 2015 -- I mean, excuse**
14 **me, March of 2011, as a consequence of this statement**
15 **being issued, which I believe you said you don't**
16 **recall seeing at the time; is that fair?**

17 A But you're asking me now about 2015?

18 **Q Nope. March of 2011. Sorry, I misspoke**
19 **there.**

20 A You're still on 2011?

21 **Q Yes. Did you start taking any new**
22 **medications in March of 2011?**

23 **Let me ask you that.**

24 A I've been taking medication to control my
25 [REDACTED] since 2002.

1 **Q Okay. So did you take any new medications**
2 **or any additional amounts of medications in March of**
3 **2011?**

4 A I have been taking the same medication
5 since 2002.

6 **Q Okay.**

7 A And that's due to [REDACTED]
8 caused from the pain that I suffered at the hands of
9 Ghislaine Maxwell and Jeffrey Epstein.

10 **Q Did you -- do you recall any neighbors or**
11 **other moms at the school or anybody in 2011**
12 **referencing to you in any way the fact that Ghislaine**
13 **Maxwell had issued a denial of the allegations about**
14 **her that had been published in the media in March of**
15 **2011?**

16 A No. I didn't speak to any -- I didn't
17 speak to any moms about what I had gone through. I
18 mean, when it came out in the press, I don't think
19 any -- like, Australians don't pay attention to news,
20 number one.

21 Number two, the first time that my friends
22 contacted me they were shocked. And this was, I
23 believe in -- when the press picked it up again, I
24 think, was 2014/2015. And I got a whole bunch of
25 like Facebook texts from them saying, Oh, my God, I

1 can't believe you've been through this. I never
2 knew. I'm so sorry. You know, that kind of stuff.
3 So they never -- I never spoke to anybody about this
4 except for my husband.

5 **Q All right. So the first time you recall**
6 **any sort of people in your community referencing**
7 **things to you is when the press picked up on it in**
8 **2014 or 2015?**

9 A Yeah, I think it may be end of 2014, early
10 2015.

11 **Q All right. And so in March of 2011 you**
12 **don't recall any neighbors or anybody saying anything**
13 **to you about this?**

14 A No, I don't recall.

15 **Q Did anyone tell you in March of 2011 about**
16 **Defendant's Exhibit 26, the statement on behalf of**
17 **Ghislaine Maxwell?**

18 A No, otherwise I would have been able to
19 recall it.

20 **Q Okay. Do you remember anyone in 2011**
21 **ridiculing you because of Defendant's Exhibit 26?**

22 A Well, because nobody knew me as Virginia,
23 everybody knows me as Jenna, no one probably put two
24 and two together. And like I told you, I didn't tell
25 anybody. So there was nobody there to ridicule me in

1 2011 over this.

2 **Q Where were you living in 2011 when Shaza**
3 **came to see you --**

4 A Oh, [REDACTED].

5 **Q Do you recall applying for any job in or**
6 **around 2011 and someone referencing Defendant's**
7 **Exhibit 26 and denying you a job?**

8 A I don't -- I don't think I applied for a
9 job in 2011.

10 **Q Okay. Did you go see a doctor and talk to**
11 **any doctor about Defendant's Exhibit 26?**

12 A Not about this. Not about this paper
13 right here. But I have talked to doctors about my
14 abuse at the hands of Ghislaine and Jeffrey.

15 **Q Have you talked to a doctor about any**
16 **statements in the press made by Ghislaine Maxwell?**

17 A Recent statements, yes.

18 **Q Which doctor did you speak to about that?**

19 A Her name is Judith Lightfoot.

20 **Q And where is she?**

21 A She's in Australia.

22 **Q Where in Australia?**

23 A She's in Sydney, but we do phone
24 conversations.

25 **Q Have you ever met her in person?**

1 A Yes.

2 **Q When?**

3 A In 2011.

4 **Q All right. And is she affiliated with an**
5 **office or a hospital or what?**

6 A She's a psychiatrist.

7 **Q All right. Have you seen her in person**
8 **since 2011?**

9 A No, because I've lived so far away and
10 she's kind of the only person that -- like, I've seen
11 a lot of doctors. And I can honestly tell you --
12 it's really hard for them to break down the walls and
13 be comfortable enough to talk to them about this
14 stuff. Judith is different. She's somebody that I
15 feel I can trust. She's 76 and she's just a very
16 lovely lady.

17 And she offers me other ways to deal with
18 my pain and suffering. And I continue to see her
19 over the phone because I can't see her in person.

20 **Q Do you recall ever discussing with her**
21 **Defendant's Exhibit 26?**

22 A I can't recall ever seeing this exhibit.
23 So --

24 **Q Okay.**
25 **(Exhibit 27 marked.)**

1 **Q (BY MS. MENNINGER) I'm going to give you**
2 **Defendant's Exhibit 27.**

3 A Yes.

4 **Q All right. Have you seen this document**
5 **before?**

6 A Yes.

7 **Q And what do you understand it to be?**

8 A [REDACTED] sounds like a PR, if
9 I'm not right -- if I'm not wrong. Sent -- or
10 subject is Ghislaine Maxwell. I don't know [REDACTED]
11 [REDACTED]
12 [REDACTED].

13 It says: To whom it may concern, Please
14 find attached credible statement on behalf of
15 Ms. Maxwell.

16 And then it goes on, to hear about that
17 she is saying: Each time the story is retold it
18 changes with new salacious details about public
19 figures and world leaders and now it is alleged by
20 Ms. Roberts that Alan Dershowitz is involved in
21 having sexual relations with her, which he denies.

22 Ms. Roberts' claims are obvious lies and
23 should be treated as such and not publicized as news,
24 as they are defamatory. Ghislaine Maxwell's original
25 response to the lies and defamatory claims remains

1 the same. Maxwell strongly denies -- excuse me.

2 Excuse me -- strongly denies allegations of an
3 unsavory nature, which have appeared in the British
4 press and elsewhere and reserves her right to seek
5 redress at the repetition of such old defamatory
6 claims.

7 **Q All right. Have you seen this statement**
8 **before?**

9 A I've seen it recently, yes.

10 **Q All right. What -- have you discussed**
11 **this statement with Ms. Lightfoot? I don't know if**
12 **she's a doctor or what.**

13 A Psychiatrist, yeah.

14 **Q Is she an MD?**

15 A I don't know what her levels of credential
16 are. I'm sure she is.

17 **Q Okay. When is the first time that you saw**
18 **the statement?**

19 A This full statement I have only seen
20 through discovery. The original statement that I saw
21 in the press was, Ms. Roberts' claims are obvious
22 lies and so on, so forth. I don't remember seeing
23 this in the press.

24 **Q Okay. So the part that you remember**
25 **seeing in the press is Ms. Roberts' claims are**

1 **obvious lies?**

2 A Yes.

3 **Q Anything else about this?**

4 A I can't remember what else she printed in
5 the press. It's a very horrible thing for her to do,
6 turn around and call me a liar after everything that
7 she knows she's done. And I didn't expect her to
8 come out and be truthful.

9 Jeffrey Epstein hasn't even issued a
10 statement.

11 **Q Sorry. I'm sorry if you misunderstood my**
12 **question.**

13 A Yes.

14 **Q Was there anything else within this**
15 **statement that you recall seeing in the press besides**
16 **the line, Ms. Roberts' claims are obvious lies?**

17 A Without saying 100 percent, I think that
18 the original allegations are not new and have been
19 fully responded to be shown to be untrue. I don't
20 know if that's in the press or not, but I've read
21 this before.

22 So I don't know if I'm confusing this with
23 what I've read out of this or what I've read in the
24 press. The main thing is, I know she called me a
25 liar, and that's what she publicized.

1 **Q And when you say she called you a liar,**
2 **that's the Ms. Roberts' claims are obvious lies part?**
3 A Yes.
4 **Q Okay. When is the first time that you saw**
5 **this whole document?**
6 A I guess when you guys handed it over for
7 discovery.
8 **Q Okay. And who showed it to you?**
9 A It was sent to me by e-mail.
10 **Q Okay. Just through the course of**
11 **communicating with your attorneys?**
12 A Yes.
13 **Q You've never seen it published?**
14 A Not this whole e-mail, no.
15 **Q All right. Did you -- I'm sorry, did you**
16 **discuss this publication of what you saw in the press**
17 **with Judith Lightfoot?**
18 A Yes.
19 **Q All right. And when did you discuss it**
20 **with her?**
21 A When I got back to Australia, Judith and I
22 started seeing each other again. Before then, I
23 spoke with a doctor in Colorado about this. His name
24 is Dr. Olsen. And it was causing me a lot of
25 distress to have to deal with being called a liar all

1 over again, when I know I'm standing up doing the
2 right thing. And the doctor prescribed me
3 [REDACTED]. And, yeah.
4 **Q Okay. So my question was, when did you**
5 **discuss it with Judith Lightfoot?**
6 **I think I now understand you did that**
7 **after you returned to Australia in November or so of**
8 **2015; is that right?**
9 A I returned to Australia in October, and
10 that's when I picked up talking to her again.
11 **Q All right. And you're saying that at**
12 **another point in time you talked to another doctor,**
13 **Dr. Olsen, in Colorado, correct?**
14 A Correct.
15 **Q And when did you meet with Dr. Olsen?**
16 A I don't know the first date that I met
17 with him.
18 **Q Did you meet with him more than once?**
19 A I believe so.
20 **Q And you believe you spoke with him about**
21 **Ghislaine Maxwell's published statement in the press**
22 **that Ms. Roberts' claims are obvious lies.**
23 **That's what you believe you spoke with**
24 **Dr. Olsen about?**
25 A I spoke with Dr. Olsen about being called

1 a liar from the people that abused me.
2 **Q Okay. Do you recall specifically**
3 **mentioning to him Ghislaine Maxwell's statement to**
4 **the press?**
5 A I mentioned a lot of names to him.
6 **Q Okay. What new symptoms did you**
7 **experience following January 2nd, 2015?**
8 A I think it's one thing to be a victim of
9 sexual abuse and survive it and come out trying to
10 tell the world my story, and then another thing for
11 it to be shut down because these people, Ms. Maxwell
12 and others are calling me liars (sic).
13 **Q And I asked you what symptoms had you**
14 **experienced --**
15 MR. EDWARDS: She's going to finish her
16 answer to this question. You cut her off so many
17 times.
18 MS. MENNINGER: It has nothing to do with
19 this.
20 MR. EDWARDS: It absolutely does. Because
21 this is a psychological damages claim, and she is
22 trying to explain to you what those damages are.
23 **Q (BY MS. MENNINGER) Okay. What are your**
24 **symptoms that you experienced since January 2nd, 2015**
25 **that are new?**

1 A Very strong anxiety attacks, bad panic
2 attacks. My throat closes up, I can't breathe. I
3 vomit when I have anxiety attacks. My -- this is
4 personal, but my sex life has suffered. My marriage
5 has suffered. Psychologically, it's just hurt me all
6 over again. I mean, they've hurt me before, and now
7 they've hurt me again by doing this.
8 And I felt like I was in the process of
9 healing before this came out because I had opened up
10 this wonderful charity called Victims Refuse Silence.
11 And then my aim was to heal by helping other girls
12 get out of the situations that I was in before.
13 And my lawyers were nice enough to help
14 me. I have this beautiful website where you can
15 click on in any state and you can find a place. I
16 have personally called all of them and they will help
17 you get out of the situation that you're in. They
18 will get you medical help. They will get you legal
19 advice. I think I was in the really good process of
20 healing. And when this came out, it just ruined me
21 all over again.
22 **Q (BY MS. MENNINGER) All right. Tell me**
23 **all of the damages that you claim occurred to you**
24 **because of Defendant's Exhibit 27.**
25 A My reputation, my psychological abuse,

1 physical ailments. My marriage has suffered, my
2 family life has suffered. I'm constantly battling
3 depression. I feel like I've taken 10 steps forward
4 and 12 steps back since this all happened.

5 **Q Okay. And by since this all happened, do**
6 **you mean since January 2nd, 2015?**

7 A That's correct.

8 **Q All right. Have you lost any income since**
9 **January 2nd, 2015 as a consequence of Defendant's**
10 **Exhibit 27?**

11 A Well, I believe that my charity that was
12 going to go forward and help other victims was going
13 to not only bring in income but also be able to
14 provide women with shelters and food and assistance
15 that I wanted to help them with.

16 I haven't been able to get a job or work
17 or anything like that. You know, financially, my
18 husband brings home the money for me. But as myself
19 goes, I couldn't work right now with everything going
20 on.

21 **Q How much income were you making prior to**
22 **December 30th, 2014?**

23 A Well, I've been a stay-at-home mom since
24 2006.

25 **Q So how much income have you lost as a**

1 **result of Defendant's Exhibit 27?**

2 A I could only imagine, you know, being the
3 head of a corporation, a charity, I would be earning
4 a decent wage. It's hard to say how much I would be
5 earning because it is a non for-profit.

6 But because of these statements telling
7 everybody in the world that I'm a liar, my charity
8 has not been able to take off. And as a consequence
9 of that, I have missed out on the results of not
10 being able to go forward with it.

11 **Q Okay. Have you applied for any job that**
12 **you've been denied since January 2nd, 2015?**

13 A I haven't been denied a job. I haven't --
14 I've just -- I thought about applying for jobs, but I
15 mean, the second that you Google my name, people are
16 going to know exactly who I am. And these days,
17 employers Google everything, and it makes me fearful
18 that if I do go apply for a job, which I would like
19 to. I mean, my kids are all at school now. I'd like
20 to get back into the work force.

21 But I'm afraid if I do, my past is going
22 to stop me from being able to do that. No one wants
23 to hire a sex slave.

24 **Q How has your reputation been harmed by**
25 **Defendant's Exhibit 27?**

1 A Well, number one, my charity. I mean,
2 that's -- that was my voice for other people to get
3 help. And I don't think that people want to get help
4 from somebody who's being called a liar in the press,
5 somebody who is claiming to be a victim that isn't.
6 I mean, I wouldn't want to get help from somebody who
7 did that, you know.

8 And I know when I introduce myself to
9 people these days, I don't introduce myself as
10 Virginia anymore. I introduce myself as another name
11 because I'm afraid that if people read papers or if
12 people Google or find out who I am that they'll think
13 differently of me.

14 **Q What do you introduce yourself as?**

15 A I tell everybody my name is Jenna.

16 **Q In what country or location has your**
17 **reputation been damaged as a consequence of**
18 **Defendant's Exhibit 27?**

19 A Considering this is worldwide publication,
20 I would say England, America, Australia. You
21 know, friends in Australia were seeing my face on
22 national TV. Like I said, I can't remember if it was
23 2014 or 2015. And I have since not been in contact
24 with those friends. I thanked them for their
25 sympathies, but it's not something I want people to

1 know about. You know, especially people close to me.

2 I mean, I want to go out there and I want
3 to help other victims. But being called a liar and
4 people having to sit there and second guess if I'm
5 telling the truth or not doesn't really give me much
6 incentive to want to make friends.

7 **Q Did anyone in Penrose, Colorado approach**
8 **you and mention Ghislaine Maxwell's name?**

9 A We have reporters at our door.

10 **Q Did anyone in Penrose, Colorado approach**
11 **you and mention Ghislaine Maxwell's name?**

12 A What, reporters? Yes, plenty of them.

13 **Q Did anyone who lives in Penrose, Colorado**
14 **approach you and mention Ghislaine Maxwell's name?**

15 A Have you ever been to Penrose? It's --
16 it's in the middle of nowhere. So you really -- I
17 didn't have friends in Penrose. There was nobody
18 that I knew there.

19 **Q All right. And which reporters mentioned**
20 **you and Maxwell's name to you in Penrose, Colorado?**

21 A We have reporters chasing us down the
22 street, in car parks, taking my kids to the doctor's,
23 going to the grocery store. You know, asking me all
24 kinds of questions about it. And I didn't talk to
25 any journalists or reporters about it.

Q And what do you recall any reporter saying to you that included the name Ghislaine Maxwell?

A Asking me -- I don't remember what they asked me, to be honest. There was regarding Ghislaine and Alan Dershowitz and Jeffrey Epstein. I mean, it was an array -- you know how reporters can be when they're hashing at you.

Q Okay. So no one in Penrose, Colorado who lived there mentioned Ghislaine Maxwell by name to you?

A Besides reporters?

Q Right. People who live in Penrose, Colorado.

A Right. I didn't know anyone in Penrose, except for my mom.

Q Okay. Now, in March or April of 2015 did you fly to New York?

A I'm sorry, what date?

Q March or April of 2015, did you fly to New York?

A It's a possibility.

Q Did you stay at the Ritz-Carlton?

A It's definitely a possibility.

Q Were you there with Mr. Edwards and Mr. Cassell and Sigrid McCawley?

A I've been to New York quite a few times. So I'd have to refresh my memory. But I have been to New York with Brad Edwards and Paul Cassell and Sigrid McCawley.

Q Was that after January 2nd, 2015?

A Definitely could be.

Q Did you give an interview to ABC News on camera?

A I did.

Q And that was after January 2nd, 2015?

A I did.

Q Did you give an interview to Good Morning America?

A No.

Q All right. Did you correspond at all with Good Morning America about the publication of your story?

A I can't remember if ABC and Good Morning America wanted to do something together. I can't -- all I know is I was interviewed by one person at ABC. I never was interviewed by anyone from Good Morning America. Maybe they were going to show the same airing in the same show, but powers that be, of course, wouldn't let it go forward.

Q Did you give a lecture to the Human

Trafficking Coalition sometime after January 2nd, 2015?

A I did give -- I did go for a speaking engagement. I don't remember when.

Q Was there any speaking engagement you had booked that was canceled after January 2nd, 2015?

A I can't remember off the top of my head.

Q All right. You founded Victims Refuse Silence in February of 2014, correct?

A It was -- it was a process because, obviously, you have to go through all the bylaws and everything. I think we started it in October of 2014, but it wasn't official until January, I think.

Q Okay. So in the period it was in operations before January 2nd, 2015, had you gotten any -- had you been paid any salary by Victims Refuse Silence?

A No, I hadn't.

Q Had --

A I mean, it was just up and running. So there was no --

Q Had any contributions been made to Victims Refuse Silence before January 2nd, 2015?

A I can't recall. You know, we've only had a few contributions. I don't know what dates they

were put in.

Q Has anyone else called you a liar in the press?

A Yes.

Q Who?

A Alan Dershowitz.

Q Anyone else?

A Ghislaine Maxwell, obviously.

Q Anyone else?

A Not that I know of.

Q Has anyone else publicly denied your allegations?

A From what Ghislaine Maxwell said?

Q Have you seen any press in which another person has denied your allegations?

MR. EDWARDS: Objection. Vague.

A I've seen allegations denied by Ms. Maxwell. And I've seen the allegations denied by Alan Dershowitz.

Q (BY MS. MENNINGER) And Alan Dershowitz actually went on TV and called you a serial liar, correct?

A Very correct.

Q You saw that, correct?

A Yes.

1 **Q And that hurt your feelings?**
2 A Badly.
3 **Q Did Buckingham Palace issue a denial of**
4 **your allegation?**
5 A Yes, that's another one.
6 **Q Did Prince Andrew make a public statement**
7 **in which he denied your allegations?**
8 MR. EDWARDS: Form.
9 A I think he did.
10 **Q (BY MS. MENNINGER) How do you know which**
11 **harm you've suffered is attributable to Ghislaine**
12 **Maxwell's denial versus Alan Dershowitz's denial or**
13 **Prince Andrew's denial?**
14 A Ghislaine Maxwell brought me into the sex
15 trafficking industry. She's the one who abused me on
16 a regular basis. She's the one that procured me,
17 told me what to do, trained me as a sex slave, abused
18 me physically, abused me mentally.
19 She's the one who I believe, in my heart
20 of hearts, deserves to come forward and have justice
21 happen to her more than anybody. Being a woman, it's
22 disgusting.
23 **Q So you cannot delineate what harm you have**
24 **suffered in terms of all of the psychological damage**
25 **you just disclosed?**

1 A Oh, of course.
2 **Q -- if that is attributable to Ghislaine**
3 **Maxwell's statement on January 2nd versus Alan**
4 **Dershowitz calling you a serial liar on Good Morning**
5 **America?**
6 A Of course, it all hurts. Okay? I know
7 Alan Dershowitz is lying himself. I know Prince
8 Andrew is lying himself. Of course those hurt. It
9 doesn't feel good to have people who have done
10 something to you deny something that's happened, when
11 I'm actually brave enough to come forward and talk
12 about it.
13 What hurts me the worst is that Ghislaine
14 Maxwell brought me into this. Not only has she hurt
15 me once, but she's hurt me twice coming forward and
16 saying, This is not true, this is categorically
17 untrue and obvious lies.
18 That to me is a stick in the mud and that
19 to me is what caused the most harm to me.
20 **Q Okay. And so can you point to any person**
21 **who has referenced Ghislaine Maxwell's denial in the**
22 **press or to your face or anywhere?**
23 A Can I point to a person?
24 **Q Can you point to any time that someone has**
25 **referenced Ghislaine Maxwell's denial to you in any**

1 **context?**
2 MR. EDWARDS: Object to the form of the
3 question.
4 A Can I point to a person -- I'm sorry. I
5 don't understand. Can you rephrase it for me --
6 **Q (BY MS. MENNINGER) All right.**
7 A -- so I can understand what you mean?
8 **Q Where you live in Australia now, has**
9 **anyone referenced the name Ghislaine Maxwell to you?**
10 A After all of the news hits, after the
11 press hits in 2015 and, you know, everyone is calling
12 me a liar, all of my friends in Australia called me
13 and talked to me and said, I can't believe this. I
14 can't believe what you went through.
15 That was very embarrassing for something
16 that I tried to keep separate from my other life
17 where I would like to help victims. I didn't want
18 the friends of my kids parents knowing about that
19 stuff. You know, and of course they all felt sorry
20 for me. And you know, like I said. I didn't know
21 anybody in Penrose. So there's nobody that could
22 have come up to me and talked to me about it. My
23 mom.
24 **Q This question was about Australia, sorry.**
25 A Oh, sorry, I thought you were talking

1 about pointing out people.
2 **Q No.**
3 A Okay, well in Australia, yes, at least a
4 dozen friends.
5 **Q They came up and they mentioned Ghislaine**
6 **Maxwell's denial to the press to you?**
7 A They couldn't believe what I had been
8 through and, you know, that these were, you know,
9 being denied, and they felt sorry for me. And, you
10 know, it was the whole circumference of things.
11 **Q So the people in Australia that came up to**
12 **you had sympathy for you and believed you, correct?**
13 A Yes.
14 **Q All right. And when you spoke to**
15 **Dr. Olsen you recall specifically mentioning**
16 **Ghislaine Maxwell's press release?**
17 MR. EDWARDS: Object to the form.
18 A Yes, I remember mentioning her, as well as
19 the press release, as well as other press releases.
20 And the abuse that I had occurred (sic) from the
21 hands of Jeffrey and Ghislaine.
22 **Q (BY MS. MENNINGER) Okay. When have you**
23 **been diagnosed with a mental health condition, first?**
24 A I don't know. I mean, I've been told that
25 I've got [REDACTED]. You know --

Q When were you first told that?

A Well, early in -- early in 2003, I believe is the first time that I was suffering from [REDACTED]. And then my doctor, Judith Lightfoot, has in 2011 [REDACTED]

And, you know, I've recently seen another doctor who said that I've got the exact same symptoms that Judith Lightfoot mentioned, which is [REDACTED]

Q Which doctor is that?

A You know, I don't honestly know his name.

Q When did you see this new doctor?

A Um --

MR. EDWARDS: Sorry. If you're referring to a doctor that's been sent to you by one of your lawyers --

THE DEPONENT: Yes.

MR. EDWARDS: -- at this time, I'm instructing you not to answer.

THE DEPONENT: Okay.

MS. MENNINGER: Wait. What is it? You've seen a doctor and you're not going to answer what doctor you've seen?

MR. EDWARDS: Sure. If it's a consulting witness in this case that has seen her at the direction of an attorney, that has not yet been disclosed per any expert witness disclosure, then I'm instructing her not to answer that question.

If that's what you're referring to. I don't know if that's what you're referring to.

THE DEPONENT: That's what I'm referring to.

Q (BY MS. MENNINGER) All right. So you recall seeing Dr. Lightfoot. You recall seeing Dr. Olsen. And you recall seeing a new unnamed doctor recently.

Anyone else you've seen since January 2nd, 2015?

A Dr. Olsen, Dr. Lightfoot. Oh, Dr. Donahue.

Q Where is Dr. Donahue located?

A He's in my suburb or he's a suburb next to me in Australia.

Q And is that a psychiatric-type doctor, a medical-type doctor?

A He's medical.

Q And what did you see him for or her for?

A I didn't have anybody to basically -- I

just got to Australia and Judith Lightfoot was

helping me. [REDACTED]

[REDACTED] And I told him the reason.

Q And this is since you returned to Australia?

A Correct.

Q And this is the first time you had seen that doctor?

A I've seen that doctor twice now.

Q I'm sorry, what was the name again? I know you already said it, but I just --

A Dr. Donahue.

Q Donahue, all right.

This doctor that you haven't yet disclosed, where did you see that person? In what country?

A United States.

Q And in what state?

A San Francisco.

Q And when did you see that doctor?

A Um, Friday. Last Friday.

Q And how many times have you seen that doctor?

A Once. Well, twice actually. I saw him

the next day, too.

Q All right. Did you suffer from anxiety before meeting Jeffrey Epstein?

A I was never prescribed anything for anxiety before I met Jeffrey Epstein.

Q That wasn't my question.

A Did I --

Q Were you suffering from anxiety before you met Jeffrey Epstein?

A I think a person who has gone through as much trauma as I have in my life would suffer from quite a few problems. But like I said, I was never prescribed anything until I met Jeffrey Epstein.

Q Did you suffer from panic attacks before meeting Jeffrey Epstein?

A Nowhere near as bad, no.

Q So you did suffer from [REDACTED]. They just weren't as severe; is that what your testimony is?

A No, what I'm trying to say is I did have [REDACTED]. I did have [REDACTED]. I had lived a very hard life prior to meeting Jeffrey Epstein as well.

After meeting Jeffrey Epstein and Ghislaine Maxwell, everything escalated. That's when I started to take Xanax and smoke marijuana to help

1 calm the anxiety and everything down.

2 **Q Before you met Jeffrey Epstein, had you**
3 **used any drugs?**

4 A Sure, yes.

5 **Q Which drugs had you used prior to meeting**
6 **Jeffrey Epstein?**

7 A I smoked pot. I've taken Ecstasy.

8 **Q Cocaine?**

9 A Yeah, I would have snorted cocaine,
10 um-hum.

11 **Q Did you ever abuse alcohol before meeting**
12 **Jeffrey Epstein?**

13 A No, I was -- I wasn't even of age to be
14 able to buy it. I mean, if there was alcohol at
15 parties I would have drank it, but I wouldn't say I
16 abused it.

17 **Q Okay. Were there ever occasions upon**
18 **which you were observed to be drunk by other people**
19 **prior to meeting Jeffrey Epstein?**

20 A If you're drinking, the possibility of
21 getting drunk is always there. I don't -- I can't
22 recall exact situation where that was the case,
23 but --

24 **Q Were you diagnosed as a drug addict prior**
25 **to meeting Jeffrey Epstein?**

Page 334

1 A No, I was not diagnosed as a drug addict.

2 **Q Were you sent to live at a rehabilitation**

3 **facility because of your use of drugs?**

4 A No, that was more of a group home. Yes,

5 it was also a rehab facility, but it wasn't because I

6 was a drug addict. I wasn't coming off of anything.

7 **Q Had you abused drugs prior to meeting**

8 **Jeffrey Epstein?**

9 A I took drugs. I didn't abuse them, but I

10 took them.

11 **Q Okay.**

12 A Recreationally.

13 **Q How often do you see Dr. Lightfoot?**

14 A Once a week every Monday. I've skipped

15 this week because I've been over here and it's

16 expensive to call back home right now, unless you

17 FaceTime, but --

18 **Q Has Dr. Lightfoot recommended that you see**

19 **a treating doctor in person?**

20 A No, she's -- she knows my history pretty

21 well. And she's a very wonderful woman and I

22 honestly wouldn't -- Dr. Donahue wants me to go see

23 another psychiatrist in person, but I prefer to stay

24 with Judith because she's someone I can personally

25 relate to.

1 **Q** How much does it cost you every time you
2 **talk to Dr. Lightfoot?**
3 A Her normal fee is \$200.
4 **Q And how much do you pay?**
5 A She doesn't charge me anything anymore.
6 **Q When did she stop charging you?**
7 A Since I got back to Australia.
8 **Q So before you left for Titusville,**
9 **Florida, you saw her and you were paying \$200 per**
10 **session?**
11 A Yes.
12 **Q And what has Dr. Lightfoot recommended**
13 **that you do in order to get better?**
14 A She loves what I'm doing with speaking
15 out. She thinks the more that I speak out about it,
16 the stronger I'll become. She recommends that I
17 write my book, I tell my story. She thinks not only
18 will it help me, but by helping me it'll help others
19 find a way to get out of the situation and to know
20 that there's other girls who have gone through what
21 I've gone through and what they're going through.
22 She recommends meditation, breathing
23 techniques, focus techniques.
24 **Q Does she prescribe medications for you?**
25 A No. she doesn't. She's a spiritual

[illegible]

Page 337

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Page 338

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Page 339

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 10 [REDACTED]
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 14 [REDACTED]
 15 **Q All right.**
 16 MS. MENNINGER: I'm going to ask that we
 17 take just a brief break and that I can hopefully then
 18 come back and just ask a few final follow-up
 19 questions, okay?
 20 THE DEPONENT: Okay.
 21 THE VIDEOGRAPHER: We are off the record
 22 at 5:16.
 23 (Recess taken from 5:16 p.m. to 5:25 p.m.)
 24 THE VIDEOGRAPHER: We're back on the
 25 record at 5:25.

Page 340

1 [REDACTED]
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 24 [REDACTED]
 25 [REDACTED]

Q When was it?

A I don't know the exact date.

Q What's your best recollection?

A I don't know. I would have to have dates in front of me. If you've got something that has a date on there, I'm happy to look at it and tell you it's right or wrong.

Q It was a few months ago or many months ago?

A Um, to my best recollection, it was about a year ago.

MS. MENNINGER: I have no further questions for you at this time. As you know, there are some questions that you refused to answer and other questions that your attorney directed you not to answer. So we will take those up with the Court and may see you again.

THE DEPONENT: Okay.

MR. EDWARDS: And just as a matter of clarification, I don't believe that there's anything she's refused to answer. There may be things that I've instructed her not to answer because I believe that they were privileged or for whatever reason I instructed her not to answer but she hasn't refused to answer them.

Either way, the record is what it is.

MS. MENNINGER: I was going to say, do you dispute that the court reporter has been taking down what was said this entire time?

MR. EDWARDS: I'll read it. She'll read.

MS. MENNINGER: Actually, that's a good question.

Q (BY MS. MENNINGER) Do you have any questions that I've asked you today that you don't feel like you understood?

A No, I don't think that there's questions that you've asked me that I don't think I've understood. But, you know, I really just want to state something for my own piece of mind, if that's okay, if I'm allowed to do that.

Q No, that's not really what this forum is about.

A Okay.

Q There are other forums.

MR. EDWARDS: That will only be good for them. There is no reason to say that.

THE DEPONENT: Okay.

MR. EDWARDS: You get a chance to talk later.

Do you have an order form? And she'll

read it.

MS. MENNINGER: We're going off the record.

MR. EDWARDS: Yeah, that's fine. She'll read.

THE VIDEOGRAPHER: That concludes today's proceedings. We're off the record at 5:28.

(Proceedings concluded at 5:28 p.m.)

* * * * *

I, VIRGINIA GIUFFRE, do hereby certify that I have read the foregoing transcript and that the same and accompanying amendment sheets, if any, constitute a true and complete record of my testimony.

Signature of Deponent
() No Amendments
() Amendments Attached

Acknowledged before me this
____ day of _____, 2016.

Notary Public: _____

Address: _____

My commission expires _____

Seal:

KAM

1 STATE OF COLORADO)
2) ss. REPORTER'S CERTIFICATE
3 COUNTY OF DENVER)
4 I, Kelly A. Mackereth, do hereby certify
5 that I am a Registered Professional Reporter and
6 Notary Public within the State of Colorado; that
7 previous to the commencement of the examination, the
8 deponent was duly sworn to testify to the truth.
9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.
14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.
18 In witness whereof, I have affixed my
19 signature this 11th day of May, 2016.
20 My commission expires April 21, 2019.
21
22
23 Kelly A. Mackereth, CRR, RPR, CSR
216 - 16th Street, Suite 600
Denver, Colorado 80202

1 AGREN BLANDO COURT REPORTING & VIDEO, INC.
2 216 - 16th Street, Suite 600
3 Denver, Colorado 80202
4 4450 Arapahoe Avenue, Suite 100
5 Boulder, Colorado 80303
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VIRGINIA GIUFFRE
May 3, 2016
Giuffre v. Maxwell
Case No. 15-cv-07433-RWS

The original videotaped deposition was filed with
Laura A. Menninger, Esq., on approximately the
11th day of May, 2016.

____ Signature waived.

____ Unsigned; signed signature page and
amendment sheets, if any, to be filed at
trial.

____ Reading and signing not requested pursuant
to C.R.C.P. Rule 30(e).

XXX Unsigned; amendment sheets and/or signature
pages should be forwarded to Agren Blando to
be filed in the envelope attached to the
sealed original.

Thank you.

AGREN BLANDO COURT REPORTING & VIDEO, INC.
cc: All Counsel

1 AGREN BLANDO COURT REPORTING & VIDEO, INC.
2 216 - 16th Street, Suite 600
3 Denver, Colorado 80202
4 4450 Arapahoe Avenue, Suite 100
5 Boulder, Colorado 80303
6
7 May 11, 2016
8
9 Sigrid S. McCawley, Esq.
10 BOIES, SCHILLER & FLEXNER LLP
11 401 East Las Olas Boulevard
12 Suite 1200
13 Fort Lauderdale, FL 33301-2211
14
15 Re: Videotaped Deposition of VIRGINIA GIUFFRE
16 Giuffre v. Maxwell
17 Case No. 15-cv-07433-RWS
18
19 The aforementioned deposition is ready for reading
20 and signing. Please attend to this matter by
21 following BOTH of the items indicated below:
22
23 _____ Call 303-296-0017 and arrange with us to read
24 and sign the deposition in our office.
25
26 _XXX_ Have the deponent read your copy and sign
27 the signature page and amendment sheets, if
28 applicable; the signature page is attached.
29
30 _____ Read the enclosed copy of the deposition and
31 sign the signature page and amendment
32 sheets, if applicable; the signature page is
33 attached.
34
35 _XXX_ WITHIN 30 DAYS OF THE DATE OF THIS LETTER
36
37 _____ By _____ due to a trial date of _____
38
39 Please be sure the original signature page and
40 amendment sheets, if any, are SIGNED BEFORE A NOTARY
41 PUBLIC and returned to Agren Blando for filing with
42 the original deposition. A copy of these changes
43 should also be forwarded to counsel of record.
44 Thank you.
45
46 AGREN BLANDO COURT REPORTING & VIDEO, INC.
47
48 cc: All Counsel

[illegible]

EXHIBIT K

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Sigrid S. McCawley, Esq.
E-mail: smccawley@bsfllp.com

June 10, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
lmenninger@hmflaw.com

Re: *Giuffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Ms. Menninger:

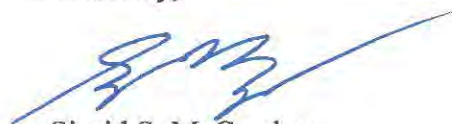
On behalf of the Plaintiff, Virginia Giuffre, documents, Bates-stamped GIUFFRE005607 through GIUFFRE005613, are being produced pursuant to Defendant's Request for Production. Certain of the documents within this production have been designated as CONFIDENTIAL in accordance with your proposed Protective Order. Please treat these documents accordingly.

This production consists solely of all data that is responsive to Defendant's various requests for production from Ms. Giuffre's iCloud account.

Attached to this letter, please also find an updated privilege log.

If you have any questions concerning the foregoing, or if there are any issues with the media, please do not hesitate to contact me at (954) 356-0011.

Sincerely,



Sigrid S. McCawley

SSM:dk
Enclosures

From: [Richards, Jason R.](#)
To: [Robert Giuffre](#)
Subject: RE: Hi There
Date: Wednesday, August 27, 2014 10:44:32 AM

Hi Jenna,

My suggestion is for you to do a Freedom of Information Act request (www.foia.gov) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of Ron Eppinger. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps.

Best wishes,

Jason

-----Original Message-----

From: Robert Giuffre [<mailto:robiejennag@icloud.com>]
Sent: Wednesday, August 27, 2014 9:49 AM
To: Richards, Jason R.
Subject: Hi There

G'day Jason,

I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an era, just need a couple dates confirmed is all.

If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about Ron Eppinger? Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?

I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

Thanks a lot mate!!

Jenna

Sent from my iPhone

From: [Richards, Jason R.](#)
To: ["robiejennag@icloud.com"](mailto:robiejennag@icloud.com)
Subject: Re: Hi There
Date: Wednesday, August 27, 2014 10:50:27 AM

Feel free to reach out to me any time.
Take care.

Jason

----- Original Message -----

From: Robert Giuffre <robiejennag@icloud.com>
To: Richards, Jason R.
Sent: Wed Aug 27 10:46:50 2014
Subject: Re: Hi There

Thank you Jason. I hope all has been well for you and yours!

All the best, I won't bother you again.

Jenna

Sent from my iPhone

> On Aug 27, 2014, at 10:44 AM, "Richards, Jason R." <Jason.Richards2@ic.fbi.gov> wrote:
>
> Hi Jenna,
>
> My suggestion is for you to do a Freedom of Information Act request (www.foia.gov) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of Ron Eppinger. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps.
>
> Best wishes,
>
> Jason
>
> -----Original Message-----
> From: Robert Giuffre [<mailto:robiejennag@icloud.com>]
> Sent: Wednesday, August 27, 2014 9:49 AM
> To: Richards, Jason R.
> Subject: Hi There
>
> G'day Jason,
>
> I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an era, just need a couple dates confirmed is all.
>
> If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about Ron Eppinger? Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?
>
> I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

GIUFFRE005608
CONFIDENTIAL

>
> Thanks a lot mate!!
>
> Jenna
>
> Sent from my iPhone

From: [Robert Giuffre](#)
To: Jason.Richards2@ic.fbi.gov
Subject: Virginia Roberts(Jane doe 102)
Date: Tuesday, April 15, 2014 9:50:31 AM

Hi Jason,

Long time, no talk. I hope all has been well for you and yours!! I am now back in the USA, not too many people know about that and I'd like to keep it that way as my case against Jeffrey Epstein has intensified!! I am here to get this BS non- prosecution agreement thrown out and speaking w Judge Paul Cassal he suggested trying to get ahold of any photos and/or video recordings released by the FBI to assist our case further in proving how much pedophilia occurred by Jeffrey and the many other monsters he obliged w underage girls. If this is a possibility please let me know so I can give you Brad Edwards(my attorney) his contact details. Many thanks for your time and I hope we should meet again.

Kindest Regards,
Virginia Roberts
Phone 321-271-4948

Sent from my iPhone

GIUFFRE005610
CONFIDENTIAL

From: [Robert Giuffre](#)
To: christina.pyror@ic.fbi.gov
Subject: Virginia Roberts re: Jeffrey Epstein Case
Date: Wednesday, April 16, 2014 1:52:05 PM

Hi Christina,

I was wondering if you remember me from Sydney Consulate, I am a victim in the investigation from the Jeffrey Epstein case and was wondering if you could tell me if I would be able to get ahold of any of the pics and/or videos that the FBI might have confiscated from any of Epstein's residences? Also can I ask if you might have any of the flight logs that include my name in them to be sent to me as well. It's all for evidential purposes and would prove a many of things to help my case.

Kindest Regards,
Virginia Roberts
321-271-4948 cell

Sent from my iPhone

GIUFFRE005611
CONFIDENTIAL

From: sharonrikard@gmail.com on behalf of [Sharon Rikard](#)
To: [Virginia Giuffre](#)
Subject: Re: Victims Refuse Silence
Date: Saturday, March 28, 2015 9:49:55 AM

Hi Virginia,

So sorry for the late response. Our organization currently works with survivors of sex trafficking provided continuing education, life skills and counseling. We will help with transportation and their basic necessities. Our ultimate goal is a home for domestic minor sex trafficking survivors.

Our contact information is:

doorstofreedom.com
infor@doorstofreedom.com
[843-817-0740](tel:843-817-0740)

I am going to forward your information to our Attorney Generals office as Marie Sazehn has compiled a list of organizations in our state of people/organizations and their involvement in helping survivors.

Thanks for all you are doing to help others!

Blessings,
Sharon Rikard

From: [Virginia Giuffre](#)
To: sharon@doorstofreedom.com
Subject: Victims Refuse Silence
Date: Wednesday, March 18, 2015 12:19:06 PM

Hi Sharon,

This is Virginia, we spoke earlier and I just wanted to say thank you for your time and what your doing to help the victims in your area. The mentality has to be changed!! Good luck!!

Kindest Regards,
Virginia Roberts

Sent from my iPhone

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
1	2/12/2015 6:14	Virginia Giuffre	smccawley@bsfllp.com		Email chain with Giuffre, Edwards and Cassell re attorney impressions and legal advice relating to deposition testimony	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
2	2/16/2015 1:05	StanPottinger@aol.com	Smccawley@BSFLLP.com,brad@pathtojustice.com,robiejennag@y7mail.com		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
3	2/16/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
4	2/16/2015 16:15	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
5	2/16/2015 16:24	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
6	2/16/2015 16:24	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
7	2/21/2015 16:45	Sigrid McCawley	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu,robiejennag@y7mail.com	Smccawley@BSFLLP.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
8	2/21/2015 16:58	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorney	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
9	2/21/2015 17:05	Brad Edwards	Smccawley@BSFLLP.com	StanPottinger@aol.com, cassellp@law.utah.edu, robiejennag@y7mail.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
10	2/21/2015 17:10	Sigrid McCawley	robiejennag@y7mail.com		Discussion of evidence among client and attorney	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
11	2/21/2015 17:16	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
12	2/23/2015 14:21	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com, brad@pathtojustice.com, cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
13	2/23/2015 14:29	StanPottinger@aol.com	Smccawley@BSFLLP.com, robiejennag@y7mail.com	brad@pathtojustice.com, cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
14	2/23/2015 16:01	Virginia Giuffre	Smccawley@BSFLLP.com	StanPottinger@aol.com, brad@pathtojustice.com, cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
15	2/24/2015 17:51	Sigrid McCawley	robiejennag@y7mail.com		Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
16					Attached case research	AC Privilege and Work Product/joint defense/commo n interest	Withheld	14	rtf
17	2/26/2015 12:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
18					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	jfif
19	2/28/2015 17:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email with Giuffre, McCawley, Edwards and Henderson re discussion of draft statement	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
20	3/13/2015 17:29	Stan Pottinger	robiejennag@y7mail.com	Smccawley@BSFLLP.com,brad@pa thtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
21	3/13/2015 17:49	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, McCawley and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
22	3/13/2015 17:56	StanPottinger@aol.com	robiejennag@y7mail.com	Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
23	3/13/2015 18:00	Brad Edwards	StanPottinger@aol.com,robiejennag@y7mail.com	Smccawley@BSFLLP.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
24	3/13/2015 18:24	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
25	3/13/2015 18:25	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
26	3/13/2015 21:53	Virginia Giuffre	brad@pathtojustice.com	Smccawley@BSFLLP.com,StanPottinger@aol.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
27	3/13/2015 23:38	Brad Edwards	robiejennag@y7mail.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
28	3/13/2015 23:40	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
29	3/17/2015 15:20	Virginia Giuffre	Smccawley@BSFLLP.com,brad@pathtojustice.com,stanpottinger@aol.com		Providing information to assist in legal advice re potential legal action, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
30	3/17/2015 18:40	Stan	Smccawley@BSFLLP.com,brad@pathtojustice.com,robiejennag@y7mail.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
31	3/17/2015 19:42	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
32	3/20/2015 15:43	Sigrid McCawley	brad@pathtojustice.com,robiejennag@y7mail.com,stanpottinger@aol.com	aortiz@BSFLLP.com,brittany@pathtojustice.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
33	3/20/2015 15:57	Sigrid McCawley	robiejennag@y7mail.com		Providing legal advice re potential deposition	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
34	3/24/2015 21:19	Sigrid McCawley	robiejennag@y7mail.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
35	3/24/2015 21:21	Virginia Giuffre	Smccawley@BSFLLP.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
36	3/24/2015 21:36	Andres Ortiz	Smccawley@BSFLLP.com,robiejennag@y7mail.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
37	3/24/2015 22:21	Virginia Giuffre	aortiz@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	3	msg
38	3/26/2015 2:00	Sigrid McCawley	robiejennag@y7mail.com	Smccawley@BSFLLP.com,StanPottinger@aol.com,brad@pathtojustice.com,brittany@pathtojustice.com,perez@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
39	3/26/2015 2:21	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
40	3/26/2015 2:22	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
41	3/26/2015 3:00	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
42	4/1/2015 21:32	Virginia Giuffre	Smccawley@BSFLLP.com		Giuffre conveying information sought by attorney to assist in legal advice with attachments	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
43	4/2/2015 7:01	Brittany Henderson	robiejennag@y7mail.com	eperez@BSFLLP.com	Providing draft legal document for client review, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
44					Attached Draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	15	pdf
45	4/3/2015 15:32	Brittany Henderson	robiejennag@y7mail.com	brad@pathtojustice.com,eperez@BSFLLP.com	Email chain with Giuffre, Henderson, Edwards and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
46					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest		15	pdf

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
47	4/8/2015 20:34	Virginia Giuffre	Smccawley@BSFLLP.com		Seeking legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
48	4/9/2015 3:23	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re advice re legal filings, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
49	4/9/2015 7:16	Sigrid McCawley	StanPottinger@aol.com,brad@pathtojustice.com,robiejennag@y7mail.com	brittany@pathtojustice.com,sperkins@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
50	4/9/2015 9:26	Brad Edwards	Smccawley@BSFLLP.com	robiejennag@y7mail.com	Email chain with Giuffre, Edwards, and McCawley re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
51	4/9/2015 9:33	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
52	4/9/2015 12:46	Sigrid McCawley	robiejennag@y7mail.com		Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
53					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	14	docx
54					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	12	docx
55					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	2	docx
56	4/10/2015 14:59	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com,brad@pathtojustice.com	Providing legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
57	4/10/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Regarding legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
58	4/10/2015 17:31	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com,brad@pathtojustice.com,brittany@pathtojustice.com,eperez@BSFLLP.com	Email chain with Giuffre, McCawley, Henderson, Edwards, Pottinger and legal assistant re legal documents, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
59					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	3	pdf

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
60					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	21	pdf
61	4/10/2015 17:40	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
62	4/10/2015 19:10	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
63	4/10/2015 19:28	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
64	4/10/2015 19:33	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
65	4/10/2015 20:03	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
66	4/10/2015 20:04	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
67	4/10/2015 20:04	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
68	4/10/2015 23:46	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley legal assistant re seeking and providing information sought by attorney to assist in providing legal advice, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
69	4/13/2015 13:52	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com,brad@pathtojustice.com	Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding potential public statements	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
70	4/13/2015 13:56	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
71	4/14/2015 23:38	Brad Edwards	Smccawley@BSFLLP.com,brittany@pathtojustice.com,robiejennag@y7mail.com,stanpottinger@aol.com		Providing legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
72	4/16/2015 11:14	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
73	4/16/2015 11:47	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
74	4/24/2015 19:22	Sigrid McCawley	robiejennag@y7mail.com		Providing legal advice re records retention, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
75					Attached letter providing legal advice re document retention	Attorney Client/joint defense/common interest/work product	Withheld	2	pdf
76	4/24/2015 19:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding potential deposition	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
77	4/27/2015 21:20	Brad Edwards	robiejennag@y7mail.com	Smccawley@BSFLLP.com	Seeking information to assist in providing legal advice	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
78	4/30/2015 6:42	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@pathtojustice.com,robiejennag@y7mail.com	Legal documents provided to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
79	4/30/2015 7:02	Brittany Henderson	robiejennag@y7mail.com		Email chain with Giuffre, Henderson and paralegal re seeking and providing information to assist in providing legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
80	4/30/2015 7:05	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
81	5/4/2015 20:04	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
82	5/11/2015 18:20	Sigrid McCawley	robiejennag@y7mail.com	Smccawley@BSFLLP.com	Email chain with McCawley, Giuffre, Edwards, Pottinger, Henderson and Paralegal re seeking and providing information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
83	5/11/2015 18:34	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
84	5/11/2015 18:40	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re case research, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
85	5/11/2015 18:45	Sigrid McCawley	brad@pathtojustice.com,robiejennag@y7mail.com		Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
86	5/11/2015 18:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re seeking information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
87	5/11/2015 18:56	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
88	5/17/2015 22:37	Sigrid McCawley	robiejennag@y7mail.com		Providing litigation documents to client, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	3	msg
89					Attached draft legal agreement	AC Privilege and Work Product/joint defense/common interest	Withheld	10	pdf
90	5/17/2015 22:40	Sigrid McCawley	robiejennag@y7mail.com		Providing legal advice re legal agreement, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
91	5/18/2015 18:40	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of confidential agreement, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
92					Attached confidential agreement page	Attorney Client/joint defense/common interest/work product	Withheld	1	jfif
93					Attached confidential agreement page	Attorney Client/joint defense/common interest/work product	Withheld	1	jfif
94	6/5/2015 19:16	Sigrid McCawley	robiejennag@y7mail.com		Conveying attorney mental impression regarding hearing	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
95	6/6/2015 17:20	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re attorney mental impression regarding hearing	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
96	6/25/2015 2:26	Sigrid McCawley	robiejennag@y7mail.com		Providing advice re status and strategy of ongoing legal matters	Attorney Client/joint defense/common interest/work product	Withheld	6	msg
97	7/17/2015 14:19	Sigrid McCawley	robiejennag@y7mail.com	eperez@BSFLLP.com	Discussion with S. McCawley regarding file related to representation by B. Josefsberg	Attorney Client/joint defense/common interest/work product	Withheld	4	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
98	7/27/2015 21:53	Virginia Giuffre	Smccawley@BSFLLP.com		Providing information to assist in legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
99	7/29/2015 19:45	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com	Conveying legal advice on media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
100	8/5/2015 19:51	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and paralegals re information sought to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
101	8/6/2015 2:14	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
102	8/6/2015 2:45	Sigrid McCawley	robiejennag@y7mail.com	brad@pathtojjustice.com	Email chain with Giuffre, McCawley, legal intern, Edwards and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
103	8/6/2015 2:55	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
104	8/6/2015 3:48	Sigrid McCawley	robiejennag@y7mail.com	Smccawley@BSFLLP.com,brad@pa thtojustice.com	Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
105	8/6/2015 3:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
106	9/1/2015 18:54	Sigrid McCawley	robiejennag@y7mail.com	brad@pathtojustice.com, brittany@pathtojustice.com	Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
107	9/7/2015 18:24	Virginia Giuffre	brad@pathtojustice.com, smccawley@bsfllp.com, stanpottinger@aol.com		Providing information sought by attorneys to provide legal advice, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
108					Attached Information sought by attorneys to provide legal advice	AC Privilege and Work Product/joint defense/common interest	Withheld	4	docx
109	9/7/2015 18:58	Sigrid McCawley	brad@pathtojustice.com, robiejennag@y7mail.com, stanpottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re collection of information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
110	9/15/2015 21:58	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
111	9/15/2015 22:04	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
112	9/15/2015 22:07	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
113	9/20/2015 12:15	Sigrid McCawley	robiejennag@y7mail.com	brad@pathtojustice.com	Conveying information about potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
114	9/20/2015 14:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
115	9/20/2015 19:16	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
116	9/20/2015 19:29	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
117	9/20/2015 19:30	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
118	9/21/2015 14:48	Sigrid McCawley	robiejennag@y7mail.com		Communication re initiation of lawsuit, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
119					Attached draft legal document relating to litigation	AC Privilege and Work Product/joint defense/common interest	Withheld	12	pdf
120					Attached draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	pdf
121					Attached draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	2	pdf
122					Attached draft legal document relating to litigation	Attorney Client/joint defense/common interest/work product	Withheld	3	pdf

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
123	9/21/2015 14:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
125	Emails, letters, and other communications from 2011 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson (and other), Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Jane Doe #1 and Jane Doe #2 v. United States ("CVRA case"), Case no. 08-80736-CIV-Marra, pending in the Southern District of Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the CVRA case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the CVRA case, communications sending or attaching attorney work product related to the CVRA case, and/or communications sending or attaching client revisions to attorney work product related to the CVRA case, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
126	Emails, letters, and other communications from 9/21/15 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Giuffre v. Maxwell ("Maxwell case"), 15-cv-07433-RWS, pending in the Southern District of New York, since the date of filing, September 21, 2015. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Maxwell case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Maxwell case, communications sending or attaching attorney work product related to the Maxwell case, and/or communications sending or attaching client revisions to attorney work product related to the Maxwell case, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
127	Emails, letters, and other communications from January 2015 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: <i>Bradley Edwards and Paul Cassell v. Alan Dershowitz</i> ("Dershowitz case"), Case no. 15-000072, pending in the Seventeenth Judicial Circuit, Broward County, Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Dershowitz case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Dershowitz case, communications sending or attaching attorney work product related to the Dershowitz case, and/or communications sending or attaching client revisions to attorney work product related to the Dershowitz case, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
128	Emails, letters, and other communications from 2009 - Present	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: <i>Jane Doe No. 102 v. Jeffrey Epstein</i> ("Epstein case"), Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida). Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Epstein case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Epstein case, communications sending or attaching attorney work product related to the Epstein case, and/or communications sending or attaching client revisions to attorney work product related to the Epstein case, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	
129	6/10/2015	Virginia Giuffre	robiejennag@y7mail.com		Email chain with Giuffre and McCawley seeking information to assist with attorney advice.	Attorney Client	Withheld	2	msg
130					Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	26	pdf
131	4/30/2015	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@pa thtojustice.com,robiejennag@y7mail.com	Communication re VRS registrations	AC Privilege and Work Product	Withheld	1	msg
132	4/29/2015	Andres Ortiz	bh699@nova.edu	Smccawley@BSFLLP.com,brad@pa thtojustice.com,garvin@lclark.edu,robiejennag@y7mail.com	Email chain with McCawley, Edwards, Garvin, Henderson, Giuffre and BSF staff re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg
133	4/29/2015	brittany henderson	aortiz@BSFLLP.com	Smccawley@BSFLLP.com,brad@pa thtojustice.com,garvin@lclark.edu,robiejennag@y7mail.com	Communication re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
134	4/17/2015	Paul Cassell	brad@pathtojustice.com	Smccawley@BSFLLP.com,brittany@pathtojustice.com,eperez@BSFLLP.com,robiejennag@y7mail.com	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	5	msg
135	4/17/2015	Sigrid McCawley	brad@pathtojustice.com,cassell@law.utah.edu	brittany@pathtojustice.com,eperez@BSFLLP.com,robiejennag@y7mail.com	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	4	msg
136	4/17/2015	Brad Edwards	cassell@law.utah.edu	Smccawley@BSFLLP.com,brittany@pathtojustice.com,eperez@BSFLLP.com,robiejennag@y7mail.com	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	4	msg
137	2/26/2015	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re non-testifying expert.	Attorney Client	Withheld	1	msg
138	2/26/2015	Sigrid McCawley	robiejennag@y7mail.com		Communication re non-testifying expert.	Attorney Client	Withheld	1	msg
139	2/11/2016	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
140	2/11/2016	Sigrid McCawley	StanPottinger@aol.com,robiejennag@y7mail.com	Lcarsen@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
141	2/11/2016	StanPottinger@aol.com	robiejennag@y7mail.com	Lcarsen@BSFLLP.com,Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
142	2/9/2016	StanPottinger@aol.com	robiejennag@y7mail.com		Email chain with Giuffre and Pottinger re media communications.	Attorney Client	Redacted	2	msg
143					Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	26	pdf
144					Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	23	docx
145	6/10/2015	Virginia Giuffre	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re ongoing litigation.	Attorney Client	Withheld	2	msg
146	4/29/2015	Virginia Giuffre	aortiz@BSFLLP.com	Smccawley@BSFLLP.com,bh699@nova.edu,brad@pathtojustice.com,garvin@lclark.edu	Email chain with Henderson, McCawley, Edwards, Garvin and BSF staff re VRS communications.	Attorney Client	Withheld	2	msg
147	4/10/2015	Virginia Giuffre	rebecca.boylan@yahoo.com		Email chain with Boylan, Giuffre, McCawley, and BSF staff re legal advice re VRS registrations.	Attorney Client	Withheld	2	msg
148	2/26/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email confirming legal advice re non-testifying expert.	Attorney Client	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre and Pottinger re media communications	Attorney Client	Redacted	3	msg
150	2/11/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.	AC Privilege and Work Product	Withheld	1	msg
152	Emails, letters, and other communications from January 2015 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). This categorical entry is regarding correspondence re potential legal action against entities and individuals. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to potential law suits, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the law suits, communications sending or attaching attorney work product related to potential lawsuits, and/or communications sending or attaching client revisions to attorney work product related to potential lawsuits, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K overlapping with other cases	

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
153	Email and letter communications	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). This categorical entry is regarding correspondence re the currently ongoing criminal investigation of Defendant and others.	Public Interest	Withheld	approx. 57 documents	
154	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
155	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
156	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

EXHIBIT N

United States District Court
Southern District Of New York

-----X		
VIRGINIA L. GIUFFRE,	:	
	:	
Plaintiff,	:	
v.	:	
	:	15-cv-07433-RWS
GHISLAINE MAXWELL,	:	
	:	
Defendant.	:	
-----X		

**DEFENDANT GHISLAINE MAXWELL'S
THIRD SUPPLEMENTAL F.R.C.P. 26(A)(1)(A) DISCLOSURES**

Pursuant to F.R.C.P. 26(a)(1)(A), Defendant Ghislaine Maxwell makes the following disclosures:

I. IDENTITIES OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS ALLEGED WITH PARTICULARITY IN THE PLEADINGS

1. Ghislaine Maxwell
c/o Laura A. Menninger, Esq.
Haddon, Morgan & Foreman, P.C.
150 E. 10th Ave.
Denver, CO 80203
303-831-7364
LMenninger@HMFLaw.com

Ms. Maxwell is the Defendant and may have knowledge concerning matters at issue, including the events of 1999-2002 and the publication of statements in the press in 2011-2015.

2. Virginia Lee Roberts Giuffre
c/o Sigrid S. McCawley, Esq.
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200

Miami, Florida 33301
(954) 356-0011
smccawley@bsflp.com

Ms. Giuffre is the Plaintiff and has knowledge concerning the matters at issue in her Complaint, including the events of 1996-2015 and the publication of statements in the press in 2011-2015.

3. Kathy Alexander
Address unknown at this time
Telephone number unknown at this time

Ms. Alexander has knowledge about matters at issue, including Plaintiff's whereabouts during 2000-2002 and her false claims concerning Defendant and others.

4. Miles Alexander
Address unknown at this time
Telephone number unknown at this time

Mr. Alexander has knowledge about matters at issue, including Plaintiff's whereabouts during 2000-2002 and her false claims concerning Defendant and others.

5. James Michael Austrich
10108 NW 261 Terrace
High Springs, Florida, 32643

Mr. Austrich has knowledge concerning matters at issue in the Complaint, including events of 1996-2002.

6. Philip Barden
Devonshires Solicitors LLP
30 Finsbury Circus
London, United Kingdom
EC2M 7DT
DX: 33856 Finsbury Square
(020) 7628-7576
Philip.Barden@devonshires.co.uk

Mr. Barden has knowledge concerning press statements by Plaintiff and Defendant in 2011-2015 at issue in this matter.

7. 

- [REDACTED]
8. David Boies
Boies, Schiller, Flexner LLP
575 Lexington Ave.
New York, NY 10022
(212) 446-2300

Mr. Boies has knowledge concerning matters at issue in the Complaint and in Plaintiff's pleadings and sworn statements in other litigations, including in particular her publicly filed allegations concerning Defendant and Alan Dershowitz.

9. Laura Boothe
The Mar-a-Lago Club, LC.
1100 South Ocean Boulevard,
Palm Beach, FL 33480

Ms. Boothe has knowledge concerning matters at issue, including the date that Sky Roberts began working at the Mar-a-Lago Club, and the human resources department at Mar-A-Lago.

10. Evelyn Boulet
Address unknown at this time
Telephone number unknown at this time

Ms. Boulet may have knowledge concerning Plaintiff's false claims against Defendant.

11. Rebecca Boylan
Address unknown at this time
Telephone number unknown at this time

Ms. Boylan has knowledge concerning Plaintiff during the relevant time period including claims for damages, motive and bias.

12. Joshua Bunner
Address unknown at this time

Joshua Bunner has knowledge concerning Plaintiff's credibility, including false claims of sexual assault.

13. Carolyn Casey
Address unknown at this time
Telephone number unknown at this time

Ms. Casey may have knowledge concerning Plaintiff's false claims against Defendant.

14. Paul Cassell
383 South University Street
Salt Lake City, UT 84112
801-585-5202
paul.cassell@law.utah.edu

Mr. Cassell has knowledge concerning press statements by Plaintiff, Plaintiff's court pleadings, and Plaintiff's sworn testimony.

15. Sharon Churcher
3 Deveau Road
N. Salem, NY 10560

Ms. Churcher has knowledge concerning matters at issue, including Plaintiff's statements regarding Defendant and others.

16. Alexandra Cousteau
Address unknown at this time
Telephone number unknown at this time

Ms. Cousteau may have knowledge concerning Plaintiff's false claims against Defendant and others.

17. Alan Dershowitz
c/o Richard A. Simpson, Esq.
WILEY REIN, LLP
1776 K Street NW
Washington, D.C. 20006
(202) 719-7000

Mr. Dershowitz has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony, at issue in this matter.

18. Dr. Mona Devanesan
PO Box 3250
601 E. Delmonte Avenue
Clerwiston, FL 33440
(561) 254-2502
modev358@aol.com

Dr. Devanesan has knowledge about matters at issue, including Plaintiff's whereabouts during 2001 and her claimed damages.

19. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

20. Bradley Edwards
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
425 N. Andrews Ave., Suite 2
Ft. Lauderdale, FL 33301
(954) 524-2820
brad@pathtojustice.com

Mr. Edwards has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony at issue in this matter. Mr. Edwards also has knowledge concerning "Victim's Refuse Silence, Inc."

21. Amanda Ellison
Address unknown at this time
561-628-4338

Ms. Ellison has knowledge concerning Plaintiff's false allegations concerning Defendant.

22. Cimberly Espinosa
1113 West Columbine Ave.
Santa Ana, CA 92707

Ms. Espinosa has knowledge concerning Plaintiff's false allegations concerning Defendant.

23. Jeffrey Epstein
c/o Tonja Haddad Coleman, Esq.
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301
(954) 467-1223

Mr. Epstein has knowledge concerning Plaintiff's false statements to the press and in court pleadings, as well as the events of 1999-2002 concerning Plaintiff and Defendant.

24. Annie Farmer
Address unknown at this time
Telephone number unknown at this time

Ms. Farmer may have knowledge concerning Plaintiff's false claims against Defendant.

25. Marie Farmer

Address unknown at this time

Telephone number unknown at this time

Ms. Farmer may have knowledge concerning Plaintiff's false claims against Defendant.

26. Alexandra Fekkai

Address unknown at this time

Telephone number unknown at this time

Ms. Fekkai may have knowledge concerning Plaintiff's false claims against Defendant and others.

27. Crystal Figueroa

Address unknown at this time

Ms. Figueroa may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002

28. Anthony Figueroa

38 Bunker View Drive

Palm Coast, FL

Mr. Figueroa has knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

29. Louis Freeh

Address unknown at this time

(202) 215-8321

Freeh@FreehGroup.com

Mr. Freeh may have knowledge concerning travel of Bill Clinton.

30. Eric Gany

Address unknown at this time

Telephone number unknown at this time

Mr. Gany may have knowledge concerning Plaintiff whereabouts during 2000-2002 and her false claims against Defendant.

31. Meg Garvin

Lewis & Clark Law School

10015 S.W. Terwilliger Boulevard MSC 51
Portland, Oregon 97219

Ms. Garvin has knowledge concerning matters at issue including Victims Refuse Silence and Plaintiff's damages.

32. Sheridan Gibson-Butte
Address unknown at this time
Telephone number unknown at this time
Ms. Gibson-Butte may have knowledge concerning Plaintiff's false claims against Defendant.

33. Robert Giuffre
Queensland, Australia

Mr. Giuffre is may have knowledge concerning matters at issue, including Plaintiff's activities during 2002-2016 and her damages allegations.

34. Ross Gow
Acuity Representation
23 Berkeley Square
London W1J 6HE
44 (0) 777 875 5251
ross@acuityreputation.com

Mr. Gow may have knowledge concerning matters at issue, including the publication of statements in the press in 2011-2015 concerning Plaintiff and Defendant.

35. Fred Graff
Address unknown at this time
Telephone number unknown at this time

Mr. Graff may have knowledge concerning Plaintiff's false claims against Defendant.

36. Philip Guderyon
Address unknown at this time
Telephone number unknown at this time

Mr. Guderyon may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

37. 



may have knowledge concerning matters at issue.

38. Shannon Harrison

Address unknown at this time

Telephone number unknown at this time

Ms. Harrison may have knowledge concerning Plaintiff's false claims against Defendant.

39. Victoria Hazel

Address unknown at this time

Telephone number unknown at this time

Ms. Hazel may have knowledge concerning Plaintiff's false claims against Defendant.

40. Brittany Henderson

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

425 N. Andrews Ave., Suite 2

Ft. Lauderdale, FL 33301

Ms. Henderson has knowledge concerning matters at issue including Victims Refuse Silence and Plaintiff's damages.

41. Brett Jaffe

Address unknown at this time

Telephone number unknown at this time

Mr. Jaffe has knowledge concerning Plaintiff's false claims concerning Ms. Maxwell including her compliance with any deposition subpoena in the CVRA matter.

42. Carol Roberts Kess

Address unknown at this time

Telephone number unknown at this time

Ms. Kess may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

43. Dr. Karen Kutikoff

12957 Palms W Drive #101

Loxahatchee, FL 33470

Dr. Kutifkoff may have knowledge concerning matters at issue, including Plaintiff's whereabouts during 1998-2002 and Plaintiff's damages.

44. Peter Listerman

Address unknown at this time

Telephone number unknown at this time

Mr. Listerman may have knowledge concerning Plaintiff's false claims against Defendant.

45. Tony Lyons

Skyhorse Publishing, Inc.

307 West 36th Street, 11th Floor

New York, NY 10018

Mr. Lyons may have knowledge concerning matters at issue, including Plaintiff's false allegations concerning Defendant and others.

46. Bob Meister

101 Seminole Avenue,

Palm Beach, FL 38480

(561) 650-0083

Mr. Meister may have knowledge concerning Plaintiff's false claims against Defendant.

47. Jamie A. Melanson

5280 NW 53rd Ave.

Coconut Creek, FL 33073

Mr. Melanson has knowledge concerning Plaintiff's honesty and truthfulness.

48. Lynn Miller

936 O Street

Penrose, CO 81240

Ms. Miller may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

49. Marvin Minsky

Address unknown at this time

Telephone number unknown at this time

Mr. Minsky may have knowledge concerning Plaintiff's false claims against Defendant and others.

50. [REDACTED]

[REDACTED]

51. David Mullen
Address unknown at this time
Telephone number unknown at this time

Mr. Mullen may have knowledge concerning Plaintiff's false claims against Defendant.

52. Joe Pagano
Address unknown at this time
Telephone number unknown at this time

Mr. Pagano may have knowledge concerning Plaintiff's false claims against Defendant.

53. Mary Paluga
Address unknown at this time
Telephone number unknown at this time

Ms. Paluga may have knowledge concerning Plaintiff's false claims against Defendant.

54. J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
914-763-8333

Mr. Pottinger may have knowledge concerning matters at issue, including Plaintiff's attempts to sell her story to the media and her contacts with the media.

55. Joseph Recarey
2753 Misty Oaks Circle
Royal Palm Beach, FL 33441
Telephone number unknown at this time

Mr. Recarey may have knowledge concerning Plaintiff's false claims against Defendant.

56. Michael Reiter
2335 So. Ocean Blvd., Apt. 15
Palm Beach, FL 33480
Telephone number unknown at this time

Mr. Reiter may have knowledge concerning Plaintiff's false claims against Defendant.

57. Jason Richards
Federal Bureau of Investigations
Address unknown at this time

Mr. Richards has knowledge concerning matters at issue, including Plaintiff's statements concerning Defendant, Alan Dershowitz and other individuals.

58. Bill Richardson
Address unknown at this time
Telephone number unknown at this time

Mr. Richardson may have knowledge concerning Plaintiff's false claims against Defendant and others.

59. Sky Roberts
15020 SE 47th Ave
Summerfield, FL 34491-5141

Mr. Roberts may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

60. Scott Rothstein
U.S. Bureau of Prisons

Mr. Rothstein has knowledge concerning Plaintiff's civil claims against Jeffrey Epstein.

61. Forest Sawyer
Address unknown at this time
Telephone number unknown at this time

Mr. Sawyer may have knowledge concerning Plaintiff's false claims against Defendant.

62. Doug Schoettle
Address unknown at this time
Telephone number unknown at this time

Mr. Schoettle may have knowledge concerning Plaintiff's false claims against Defendant.

63. Cecilia Stein

Address unknown at this time

Telephone number unknown at this time

Ms. Stein may have knowledge concerning Plaintiff's false claims against Defendant.

64. Mark Tafoya

Address unknown at this time

Telephone number unknown at this time

Mr. Tafoya may have knowledge concerning Plaintiff's false claims against Defendant.

65. Brent Tindall

Address unknown at this time

Telephone number unknown at this time

66. Kevin Thompson

Address unknown at this time

Kevin Thompson has knowledge concerning Plaintiff's credibility, including false claims of sexual assault.

67. Ed Tuttle

Address unknown at this time

Telephone number unknown at this time

Mr. Tuttle may have knowledge concerning Plaintiff's false claims against Defendant.

68. Emma Vaghan

Address unknown at this time

Telephone number unknown at this time

Ms. Vaghan may have knowledge concerning Plaintiff's false claims against Defendant.

69. Kimberly Vaughan-Edwards

Address unknown at this time

Telephone number unknown at this time

Believed to be in the UK

Ms. Vaughan-Edwards has knowledge concerning facts relevant to this dispute and Ms. Maxwell's character.

70. Cresenda Valdes
Address unknown at this time
Telephone number unknown at this time

Ms. Valdes may have knowledge concerning Plaintiff's false claims against Defendant.

71. Anthony Valladares
Address unknown at this time
Telephone number unknown at this time

Mr. Valladares may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

72. Maritza Vazquez
Address unknown at this time
Telephone number unknown at this time

Ms. Vazquez may have knowledge concerning Plaintiff's false claims against Defendant.

73. Vicky Ward
Address unknown at this time
Telephone number unknown at this time

Ms. Ward may have knowledge concerning Plaintiff's false claims against Defendant.

74. Jarred Weisfeld
Address unknown at this time

Mr. Weisfeld may have knowledge concerning matters at issue, including Plaintiff's attempted publication of false allegations concerning Defendant and others.

75. Courtney Wild
Pinellas County Jail

Ms. Wild may have knowledge concerning Plaintiff's false claims against Defendant.

76. Daniel Wilson
Address unknown at this time

Telephone number unknown at this time

Mr. Wilson may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

77. Andrew Albert Christian Edwards, Duke of York

Address unknown at this time

Telephone number unknown at this time

The Duke has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony as well as the events of 1999-2002.

78. Witness identified by Plaintiff in any of the various versions of her Rule 26 disclosures.

79. Witnesses whose identities and contact information can be identified in law enforcement reports disclosed herein.

80. Any other witness learned through the discovery process.

Defendant Ghislaine Maxwell reserves her right to supplement these disclosures as additional witnesses are learned through the discovery process, or endorsed by Plaintiff.

II. DOCUMENTS, DATA, COMPILATIONS AND TANGIBLE THINGS IN POSSESSION, CUSTODY OR CONTROL OF DEFENDANT THAT MAY BE USED TO SUPPORT DEFENDANT'S CLAIM OR DEFENSES

1. Documents received from any other party through disclosures and/or in discovery, including any deposition exhibits, will not be identified or produced, though they technically may fall within this category "II", and Defendant reserves the right to utilize such documents at any hearing or trial on this matter.
2. News articles from the internet:
 - a. "Sordid friends and why he isn't fit for the job: Duke of York risks losing ambassador role," *Daily Mail Online* (Feb. 28, 2011).
 - b. "Prince Andrew and the 17-year-old girl his sex offender friend flew to Britain to meet him," *Daily Mail Online* (corrected Mar. 2, 2011).
 - c. "Unsavoury association: How Robert Maxwell's daughter 'procured young girls' for Prince Andrew's billionaire friend," *Daily Mail Online* (Mar. 5, 2011).

- d. "Virginia Roberts' account of the explosive Prince Andrew 'sex slave' drama," *Daily Mail Online* (Jan. 3, 2015).
 - e. "Court papers put daughter of Robert Maxwell at centre of 'sex slave' scandal," *The Guardian* (Jan. 4, 2015).
 - f. "Prince Andrew denies sexual abuse allegations in unprecedented Buckingham Palace statement: The Duke of York denies having relations with alleged 'sex slave,'" *The Independent* (Jan. 4, 2015).
 - g. "Prince Andrew story runs and runs - but editors should beware," *The Guardian* (Jan. 5, 2015).
 - h. "US lawyer sues in Prince Andrew sex claims case," *Time* (Jan 6, 2015).
 - i. "Harvard professor Alan Dershowitz denies charges of sex with underage girl," *Boston Globe* (Jan. 22, 2015).
 - j. "Virginia Roberts's Aunt Reveals Jeffrey Epstein Girl Says I Am In Fear for My Life," *Daily Mail Online*, (Jan. 10, 2015).
 - k. "EXCLUSIVE: Alleged 'sex slave' of Jeffrey Epstein, Prince Andrew accused two men of rape in 1998, but was found not credible," *NY Daily News* (Feb. 23, 2015).
 - l. "Jeffrey Epstein accuser was not a sex slave, but a money-hungry sex kitten, her former friends say," *NY Daily News* (Mar. 1, 2015).
 - m. "Twat Claims She Was Underage Sex Slave Bedding Prince Andrew," <http://www.mgtowhq.com/viewtopic.php?f=2&t=6676> (Jan. 5, 2015).
 - n. "Exclusive: Prince Andrew at Heidi Klum's 'Hookers and Pimps' party with the New York socialite accused of procuring underage girls for his billionaire pedophile friend" *Daily Mail Online* (May 10, 2016).
- 3. Email from Ross Gow to various news organizations, Subject: "Ghislaine Maxwell," (Jan. 2, 2015).
 - 4. "Lawyers Acknowledge Mistake In Filing Sexual Misconduct Charges Against Professor Dershowitz," Joint Statement of Brad Edwards, Paul Cassell and Alan Dershowitz (Apr. 8, 2016).
 - 5. *Edwards and Cassell v. Dershowitz*, In the Circuit Court of the Seventeenth Judicial District In and For Broward County Florida to include:

- a. Deposition testimony of Paul G. Cassell, dated October 16, 2015 and October 17, 2015.
6. *Jane Doe #1 and #2 v. United States*, U.S. District Court for the Southern District of Florida, 08-cv-80736-KAM pleadings to include:
 - a. Motion for Limited Appearance, Consent to Designation and Request to Electronically Receive Notices of Electronic Filing (July 28, 2008) (Doc. # 16)
 - b. Notice of Change of Address and Firm Affiliation (Apr. 9, 2009) (Doc. # 37)
 - c. Order Denying Petitioners' Motion to Join Under Rule 21 and Motion to Amend Under Rule 15 (Apr. 7, 2015) (Doc. #324)
 - d. Order Scheduling Settlement Conference Before the Magistrate Judge, U.S. District Court (Mar. 31, 2016) (Doc. #378)
7. *Epstein v. Scott Rothstein and Bradley J. Edwards*, In the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida, 09-ca-040800, pleadings to include:
 - a. Complaint (Dec. 7, 2009).
8. Law enforcement records obtained from the Palm Beach County (Florida) Sheriff's Office, the Royal Palm Beach (Florida) Police Department, the County Court in and for Palm Beach County (Florida), the Greenacres (Florida) Department of Public Safety, and the Fremont County (Colorado) Sheriff's Office.
9. Employment records obtained from ET Employment Training and Recruiting Australia.
10. Education records obtained from Royal Palm Beach Community High School and Forest Hills High School.
11. Documents received from Palm Beach County Library System.
12. Documents received from any other party through disclosures and/or in discovery, including any deposition exhibits, will not be identified or produced, though they technically may fall within this category "II", and Defendant reserves the right to utilize such documents at any hearing or trial on this matter.

Defendant reserves the right to identify additional documents, data, compilations and tangible things as discovery continues and to supplement this list accordingly.

**III. DESCRIPTION OF CATEGORIES OF DAMAGES SOUGHT AND
COMPUTATION OF ECONOMIC DAMAGES CLAIMED BY THE
DISCLOSING PARTY**

Not applicable at this time Ms. Maxwell reserves her right to supplement these disclosures as necessary.

**IV. INSURANCE AGREEMENT UNDER WHICH ANY PERSON CARRYING
ON AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY A PART
OR ALL OF A JUDGMENT**

Ms. Maxwell's AIG Homeowners and Excess Liability insurance policies. Coverage has been denied by AIG, as their letter of April 18, 2016 to Ms. Maxwell, copied to Ms. McCawley, attests.

Dated: June 17, 2016.

Respectfully submitted,

s/ Laura A. Menninger

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Jeffrey S. Pagliuca

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CERTIFICATE OF SERVICE

I certify that on June 17, 2016, I electronically served this *DEFENDANT GHISLAINE MAXWELL'S THIRD SUPPLEMENTAL F.R.C.P. 26(A)(1) DISCLOSURES* via e-mail on the following:

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