

EXHIBIT D

Confidential

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

****CONFIDENTIAL****

Continued Videotaped Deposition of
GHISLAINE MAXWELL, the Defendant herein,
taken pursuant to subpoena, was held at
the law offices of Boies, Schiller &
Flexner, LLP, 575 Lexington Avenue, New
York, New York, commencing July 22,
2016, 9:04 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

- - -
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 BY: JEFFREY S. PAGLIUCA, ESQUIRE
 LAURA A. MENNIGER, ESQUIRE
 Also Present:

1
 2 MR. EDWARDS: Brad Edwards, also
 3 representing the plaintiff, Virginia
 4 Giuffre.

5 MR. POTTINGER: Stan Pottinger,
 6 also representing the plaintiff.

7 MR. CASSELL: Paul Cassell, from
 8 Salt Lake City, Utah, also representing
 9 Ms. Giuffre.

10 MR. PAGLIUCA: Jeff Pagliuca and
 11 Laura Menninger, on behalf of Ms.
 12 Maxwell.

13 And Ms. McCawley has also entered
 14 the room, and we have an assistant from
 15 Boies Schiller from the Fort Lauderdale
 16 office here today as well today.

17 THE VIDEOGRAPHER: Will the court
 18 reporter please swear in the witness.

19 GHISLAINE MAXWELL,
 20 called as a witness, having been duly
 21 sworn by a Notary Public, was
 22 examined and testified as follows:

23 EXAMINATION BY

24 MR. BOIES:

25 Q. Good morning, Ms. Maxwell. [REDACTED]

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1
 2 THE VIDEOGRAPHER: This is DVD No.
 3 1, Volume II, of the continued video
 4 recorded deposition of Ghislaine Maxwell
 5 in the matter Virginia Giuffre against
 6 Ghislaine Maxwell, in the United States
 7 District Court, Southern District of New
 8 York.

9 This deposition is being held at
 10 575 Lexington Avenue, New York, New
 11 York, on July 22, 2016 at approximately
 12 9:04 a.m.

13 My name is Rodolfo Duran. I am the
 14 legal video specialist. The court
 15 reporter is Leslie Fagin, and we are
 16 both in association with Magna Legal
 17 Services.

18 Will counsel please introduce
 19 themselves.

20 MR. BOIES: This is David Boies, of
 21 Boies, Schiller & Flexner, counsel for
 22 plaintiff.

23 MS. SCHULTZ: Meredith Schultz,
 24 from Boies Schiller & Flexner, counsel
 25 for plaintiff.

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 2 [REDACTED]

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2

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

24 MR. BOIES: Excuse me, counsel.

25 MR. PAGLIUCA: I'm objecting to

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2 form and foundation, and I have an
3 opportunity to do that.

4 MR. BOIES: Yes, you do, but you do
5 not have an opportunity to disrupt the
6 deposition.

7 MR. PAGLIUCA: Which I'm not.

8 MR. BOIES: The court will decide
9 that, as the court has decided the
10 issues before.

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<p style="text-align: right;">Page 10</p> <p>1 G. Maxwell - Confidential 2 [REDACTED]</p>	<p style="text-align: right;">Page 12</p> <p>1 G. Maxwell - Confidential 2 [REDACTED]</p>
<p style="text-align: right;">Page 11</p> <p>1 G. Maxwell - Confidential 2 [REDACTED]</p>	<p style="text-align: right;">Page 13</p> <p>1 G. Maxwell - Confidential 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 Q. You understand that you are under 7 oath, correct? 8 A. I do. 9 Q. And you understand that the oath 10 requires you to tell the truth, the whole 11 truth and nothing but the truth in response 12 to questions? 13 MR. PAGLIUCA: Object to the form 14 and foundation. 15 Q. Do you? 16 A. I do understand that. 17 Q. Do you understand if you fail to do 18 that, that you could be prosecuted for 19 perjury? 20 MR. PAGLIUCA: Object to the form 21 and foundation. 22 A. I understood that is what happens 23 at these events. 24 Q. And do you understand that if you 25 say that you do not recall and in fact you do</p>

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1 G. Maxwell - Confidential
 2 recall, that would violate your oath?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 A. If I don't recall, I don't recall.
 6 It's not a question of whether I'm violating
 7 my oath or not. I don't know.

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 2 [REDACTED]

23 Q. Were you ever on a plane with
 24 Mr. Epstein when Mr. Epstein had sex with
 25 anyone?

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1 G. Maxwell - Confidential
 2 [REDACTED]

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1 G. Maxwell - Confidential
 2 MR. PAGLIUCA: Object to the form
 3 and foundation.

4 A. How would I know?

5 Q. Were you ever on a plane with
 6 Mr. Epstein when, to your knowledge,
 7 Mr. Epstein had sex with anyone?

8 A. Can you repeat the question?

9 Q. Were you ever on a plane with
 10 Mr. Epstein when, to your knowledge,
 11 Mr. Epstein had sex with anyone?

12 A. Not that I can recall.

13 Q. Were you ever on a plane with
 14 Mr. Epstein when you saw Mr. Epstein having
 15 sex with anyone?

16 A. Never.

17 Q. I want to be sure that the question
 18 and answer is meeting. When you refer to
 19 having sex with someone, what are you
 20 referring to?

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

23 A. Intercourse.

24 Q. And when you refer to intercourse,
 25 what do you refer to?

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2 A. I think everyone here can
3 understand what intercourse is, is when you
4 have sex. I don't know how to say
5 intercourse any other way, having sex with
6 somebody. Perhaps you would like to define
7 it for me.

8 Q. I'm trying to get your definition
9 right now because you are the witness. When
10 you use the term intercourse, what are you
11 referring to?

12 A. I'm referring to a penis entering
13 someone's vagina.
14

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11 MR. PAGLIUCA: I'm going to
12 instruct you not to answer, unless you
13 tie it to a specific individual related
14 to this case per the court's order.

15 MR. BOIES: I think the court's
16 order specifically permits this question
17 with respect to occasions related to
18 this case. If you instruct her not to
19 answer, all you're going to do is bring
20 her back. That's up to you.

21 MR. PAGLIUCA: It's up to you as
22 the questioner, Mr. Boies.

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6 You haven't tied your question to
7 time or individual or specific location.
8 And so unless you do that, we have an
9 open-ended question that would span from
10 the early '90s to 2000 or so, which
11 would not be tied to the key events,
12 individuals or locations of this case.

13 BY MR. BOIES:

14 Q. Let me ask you a couple more
15 questions. Then I think we probably ought to
16 call the court and get some guidance on this.
17

24 Q. Were you ever on Mr. Epstein's
25 plane when, to your knowledge, Mr. Epstein

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court case on this list, one other person.

Q. Which one is that?

A. [REDACTED], because she has been in the court papers.

Q. [REDACTED] who?

A. [REDACTED]

The only two I know is [REDACTED] and Virginia, and one other name I recognize.

Q. So just to be clear, the only two people listed on Maxwell Deposition Exhibit 26 that you know are [REDACTED]

A. And Virginia Roberts, yes.

Q. And the only other person on --

A. I don't know her, I recognize her name.

Q. -- whose name you recognize is [REDACTED], but you don't know her, never met her?

A. I don't recall ever meeting her.

Q. Other than what you know from her participation in this case, you don't know anything about her, is that your testimony?

A. I don't even know -- I don't even recognize what her participation is in this

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case. I just know I recognize her name, and I can't recall right now what her involvement is, but I recognize the name.

Q. Other than whatever her involvement in this case may be or may not be?

(Maxwell Exhibit 26, List of names, marked for identification, as of this date.)

Q. I would like you to go down this list and tell me which names, if any, you recognize on this list.

A. Just in the way the list runs in order, I recognize the names -- by recognize, only stating that I know the name, I'm not making any representations about these people.

Q. I understand that, and I will come back and ask you, but if you don't recognize the name...

A. [REDACTED]. Virginia Roberts.

And that's it on this list. Let me just double-check. I recognize the name, not because I know her, but just because of the

A. Correct.

Q. Is it fair to say it is your testimony that except for that, you have no knowledge about her at all?

A. Correct.

Q. And other than [REDACTED], Virginia Roberts and [REDACTED], you don't know anything at all about any of the other people listed here, is that your testimony?

A. I don't even know who they are.
You could put any names in front of me, I
wouldn't recognize them, I don't know them, I
don't even recognize the names.

Q. I think this is clear from your last answer, but I want to be sure. It is your testimony that other than [REDACTED] and Virginia Roberts, you never met any of these people at any homes of Mr. Epstein, is that your testimony?

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

4 A. I don't even know who they are, so
5 I wouldn't -- I have no clue who they are, I
6 don't know where they are, I don't know where
7 they come from, I don't recognize -- I only
8 pointed out [REDACTED] because I recognize
9 the name from various documents I read. I
10 don't have any knowledge of any other person
11 on this list. I don't believe I've ever even
12 seen these names. I don't know who they are
13 at all.

14 I would not be able to identify a
15 single name on this list other than those
16 three that I have indicated to you.
17 [REDACTED]

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2 a massage at his home in New York, regardless
3 of where in the home it was?

4 A. No.

5 Q. Have you ever seen anyone give
6 Mr. Epstein a massage at his home in Palm
7 Beach?

8 A. I have.

9 Q. Have you ever seen anyone give
10 Mr. Epstein a massage in New Mexico?

11 A. No, I can't recall.

12 Q. Have you ever seen anyone give
13 Mr. Epstein a massage in the Virgin Islands?

14 A. I have.

15 Q. Have you ever seen anyone give
16 Mr. Epstein a massage in Paris?

17 A. No, I don't recall seeing that.

18 Q. Have you ever seen anyone give
19 Mr. Epstein a massage on an airplane?

20 A. No.

21 Q. Have you ever seen anyone give
22 Mr. Epstein a massage anywhere other than his
23 home in Palm Beach or in the Virgin Islands?

24 A. I'm sorry, can you just repeat the
25 question?

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2 [REDACTED]
3 [REDACTED]
4 [REDACTED]

5 Q. Did you provide massages to
6 Mr. Epstein?

7 A. No.

8 Q. What?

9 A. No.

10 Q. Were you ever present when anyone
11 provided a massage to Mr. Epstein?

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

14 A. I have seen people give Mr. Epstein
15 massages. I have seen him on a massage
16 table. I have seen that.

17 Q. Have you seen someone other than
18 yourself give Mr. Epstein a massage at his
19 home in New York?

20 A. I can't recall seeing him in the
21 massage room in New York, no.

22 Q. I'm not asking whether you recall
23 seeing him in the massage room in New York.
24 I'm asking you whether you have ever seen
25 someone other than yourself give Mr. Epstein

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2 Q. Have you ever seen anyone give
3 Mr. Epstein a massage anywhere other than in
4 his home in Palm Beach or in the Virgin
5 Islands?

6 A. No, I can't think of anyplace.

7 Q. Have you ever seen anyone give
8 Mr. Epstein a massage when Mr. Epstein was
9 not clothed?

10 A. Sorry, can you repeat the question?

11 Q. Have you ever seen anyone give
12 Mr. Epstein a massage when Mr. Epstein was
13 not clothed?

14 A. I think when Mr. Epstein received
15 massages, he never had clothes on.

16 Q. Who did you see give Mr. Epstein a
17 massage?

18 A. I can't recall the "whos" because I
19 don't really remember, but I have seen him
20 receive massages from professional adult
21 masseuses that I have seen him receive
22 massages.

23 Q. When you say professional adult
24 masseuses, what are you referring to?

25 A. I just want to be sure that we

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<p>1 G. Maxwell - Confidential</p> <p>2 understand that the times I have seen him</p> <p>3 receive a massage it's been by somebody who</p> <p>4 is an adult, clearly an older person. I</p> <p>5 don't know if they're professional, but an</p> <p>6 older person appearing to be a professional</p> <p>7 masseuse.</p> <p>8 Q. What led you to believe that the</p> <p>9 person giving the massage was a professional</p> <p>10 masseuse?</p> <p>11 A. Because the massages that I</p> <p>12 witnessed looked professional. I don't know</p> <p>13 how to -- I'm defining it as opposed to the</p> <p>14 ones from where people ask me inappropriate</p> <p>15 questions, I couldn't answer, but these are</p> <p>16 people who would be clothed giving a</p> <p>17 professional massage, it appeared to be a</p> <p>18 professional massage, as opposed to any other</p> <p>19 type of massage.</p> <p>20 Q. Have you ever had what you refer to</p> <p>21 as a professional massage?</p> <p>22 A. I have.</p> <p>23 Q. Have you ever had what you refer to</p> <p>24 as a professional massage in any of Mr.</p> <p>25 Epstein's homes?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 as professional massages, you were clothed or</p> <p>3 unclothed?</p> <p>4 A. Unclothed.</p> <p>5 Q. Completely unclothed?</p> <p>6 A. Typically when you receive a</p> <p>7 massage you are not clothed, so I was</p> <p>8 unclothed, as is the norm in a massage</p> <p>9 situation.</p> <p>10 Q. That is, you didn't have any</p> <p>11 clothes on, is that the case?</p> <p>12 A. Generally, what happens is you are</p> <p>13 not wearing any clothes and you have a towel</p> <p>14 or sheet that covers you while you are</p> <p>15 receiving the massage, so I would be covered</p> <p>16 always, but underneath the sheet or towel, I</p> <p>17 would not be wearing any clothing.</p> <p>18 Q. Are you saying that the massage was</p> <p>19 through the sheet?</p> <p>20 A. Well, in some instances, yes.</p> <p>21 Q. It is your testimony that when you</p> <p>22 received what you referred to as professional</p> <p>23 massages, the masseuse didn't touch your</p> <p>24 skin, only touched the sheet?</p> <p>25 MR. PAGLIUCA: Object to the form</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 A. I have.</p> <p>3 Q. Did you ever have what you refer to</p> <p>4 as a professional massage in Mr. Epstein's</p> <p>5 home in New York?</p> <p>6 A. I don't recall, but I think I have,</p> <p>7 but I don't recall. I must have, but I don't</p> <p>8 recall.</p> <p>9 Q. Did you ever have what you refer to</p> <p>10 as a professional massage in Mr. Epstein's</p> <p>11 home in Palm Beach?</p> <p>12 A. I did.</p> <p>13 Q. Did you ever have what you refer to</p> <p>14 as a professional massage in Mr. Epstein's</p> <p>15 home in New Mexico?</p> <p>16 A. I did.</p> <p>17 Q. Did you ever have what you refer to</p> <p>18 as a professional massage in Mr. Epstein's</p> <p>19 home in Paris?</p> <p>20 A. I did.</p> <p>21 Q. Did you ever have what you refer to</p> <p>22 as a professional massage in the Virgin</p> <p>23 Islands?</p> <p>24 A. I did.</p> <p>25 Q. When you had what you referred to</p>	<p>1 G. Maxwell - Confidential</p> <p>2 and foundation.</p> <p>3 A. I didn't say that. I said in some</p> <p>4 instances, some massages are where you don't</p> <p>5 touch the skin, so I have received massages</p> <p>6 where I don't get touched, especially if it's</p> <p>7 just pressure, so it's through a sheet, but I</p> <p>8 have also received massages where you are</p> <p>9 touched and the sheet is just there for</p> <p>10 modesty.</p> <p>11 Q. Have you ever received what you</p> <p>12 referred to as a professional massage when</p> <p>13 anyone else was in the room other than the</p> <p>14 person that you are referring to as a</p> <p>15 professional masseuse?</p> <p>16 MR. PAGLIUCA: Object to the form</p> <p>17 and foundation.</p> <p>18 A. Can you repeat the question,</p> <p>19 please?</p> <p>20 Q. Have you ever received a massage</p> <p>21 when anyone was in the room other than the</p> <p>22 person that you refer to as a professional</p> <p>23 masseuse?</p> <p>24 MR. PAGLIUCA: Same objection.</p> <p>25 A. I am entirely possible that in the</p>

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 course of receiving a massage someone would
 come in and sit and chat to me while I was
 getting a massage, a friend would come in.
 That has happened.

Q. Do you recall that happening?

A. Not with specificity, I can't think
 of it actually, but I know that I've had
 friends come in and we've talked and as I got
 a massage, that has happened.

Q. Have you ever received a massage
 when Mr. Epstein was present?

A. He has entered the room and gave me
 a message or asked me a question, that has
 happened.

Q. Have you ever received a massage
 when Mr. Epstein was in the room other than
 just to come in to give you a message or ask
 you a question?

MR. PAGLIUCA: Object to the form
 and foundation.

A. Not that I recall.

Q. Did you ever participate in
 arranging for anyone to give Mr. Epstein a
 massage?

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A. Part of my duties and my job -- can
 you repeat the question so I understand, and
 I give you the right answer exactly.

Q. Did you ever participate in
 arranging for anyone to give Mr. Epstein a
 massage?

A. Part of my professional
 responsibilities, I did, and I've testified
 previously, go to spas and other professional
 areas and received massages from people in
 these places, and if I felt that person was
 good or I had had a good massage, I had asked
 if they do home visits.

In that capacity, I had, people did
 come to the house in that capacity, that I
 thought were good.

Q. Did you ever arrange for anyone to
 give Mr. Epstein a massage or to come to his
 home to give him a massage, other than
 someone who had previously given you a
 massage?

A. Sorry, can you repeat the question?

Q. Did you ever arrange for anyone to
 give Mr. Epstein a massage or to come to his

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home to give him a massage, other than
 someone who had previously given you a
 massage?

A. No, I don't think so. No, I don't
 think so.

Q. Is it your testimony that everyone
 that you arranged to come to Mr. Epstein's
 home to give Mr. Epstein a massage was
 somebody you had already had a massage from?

A. No, that is not my testimony. I
 don't recall -- there were definitely
 instances where I had a massage and -- so
 what you are asking me was if anyone came to
 the house to give him a massage that I had
 not had a massage from myself?

Q. It's a little different than that.

A. Okay.

Q. You've testified that you arranged
 for some people to come to Mr. Epstein's home
 to give him a massage, correct?

A. Yes.

Q. And at one point, I thought you had
 testified that before you arranged to have
 people come to give Mr. Epstein a massage,

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you had -- you didn't use the word tested
 them out, but that you had previously gotten
 them to give you a massage so that you could
 see how good they were, is that fair to say?

A. If I thought they were -- if I
 thought it was a good massage, yes, that is
 my testimony.

Q. What I had thought, and what I'm
 now asking you is that everyone who you
 arranged to come to Mr. Epstein's home to
 give him a massage was somebody who you had
 already had a massage from, is that fair?

A. Typically, yes, but that wasn't
 exclusively. So I know that friends of mine,
 for instance, would have a masseuse or
 masseur that they thought was very good, and
 they said this is a very good person.

So it is possible, and I'm pretty
 sure sometimes on recommendations of other
 people, that without me having a massage from
 them, that they may have come to the house.
 So I could not testify that every single
 person that came to the house I received a
 massage from, because that would not be true.

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2 Q. Was every person who you arranged
3 to come to Mr. Epstein's house to give a
4 massage someone who either you had already
5 had a massage from or you had a friend who
6 recommended them as a good professional
7 masseuse?

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

10 A. Typically, that is how that would
11 work.

12 Q. Was there ever anyone who you
13 arranged to come to Mr. Epstein's house to
14 give him a massage, someone who you had not
15 previously gotten a massage from yourself or
16 received a recommendation from one of your
17 friends that it was a good professional
18 masseuse?

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

21 A. I cannot think of anyone that would
22 fit that category.

23 Q. You made a point in a previous
24 answer of referring to people as adult
25 masseuses. Do you recall that?

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2 A. I know what the allegations are,
3 and I am aware of those, but as to my actual
4 knowledge of somebody under the age of 21, I
5 can't say that I know, I can't think of
6 anybody. I know Virginia has obviously made
7 those claims and she was 17 when he met her,
8 but other than her, I cannot think of
9 anybody.

10 Q. Insofar as you are aware, did
11 Virginia ever give Mr. Epstein a massage?

12 A. I know she said she did and I
13 believe she may have, but I don't ever see
14 her giving him a massage, so I can't say.

15 Q. Leaving aside any information that
16 you have that has come from Virginia in the
17 last decade?

18 A. Right.

19 Q. Going back to the time when
20 Virginia was less than 21, at that period of
21 time, did you believe that Virginia was
22 giving Mr. Epstein massages?

23 A. I do think she was giving him
24 massages.

25 Q. Is it your testimony that the only

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2 A. I do.

3 Q. When you refer to someone as an
4 adult masseuse, what are you referring to?

5 A. I think everybody in this room is
6 an adult.

7 Q. I don't necessarily disagree with
8 that, but what I'm asking you, since I can't
9 carry all these people with me every time
10 somebody reads this transcript, is what do
11 you mean by an adult?

12 A. Well, I think an adult is somebody
13 who looks older and professional and is
14 someone who has lived some life and looks
15 like any one of us in this room do, some a
16 little older and some a little younger.

17 Q. You are aware that there are
18 assertions that Mr. Epstein had massages from
19 females under the age of 21?

20 A. I am aware of that.

21 Q. Insofar as you are aware, did
22 Mr. Epstein ever have a massage from anyone
23 under the age of 21?

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

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2 female that you had any reason to believe was
3 under 21 who was giving Mr. Epstein massages
4 was Virginia?

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

7 A. First of all, I didn't know how old
8 Virginia was, so other than Virginia, so I
9 can't say, but other than -- I was not aware
10 of anybody else, no.

11 Q. You first met Virginia when?

12 A. I don't know.

13 Q. Approximately?

14 A. I believe it was in 2000, but now
15 I'm going off the knowledge that I have, not
16 from memory, so I met her the end of 2000
17 apparently.

18 Q. And when you met Virginia in 2000,
19 how old did you think she was?

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

22 A. I didn't think about how old she
23 was. I don't recall the actual meeting of
24 Virginia, so I can't say, but I think she was
25 at least, I thought she was a professional

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<p>1 G. Maxwell - Confidential</p> <p>2 masseuse as far as I can recall today, so</p> <p>3 that would have made her, I thought that</p> <p>4 would have made her, to work in a spa, I</p> <p>5 didn't think about, and I, I thought she</p> <p>6 appeared to be a professional masseuse.</p> <p>7 Q. Remember questions a while ago</p> <p>8 where you made a big point about people being</p> <p>9 adult masseuses?</p> <p>10 A. Right, yeah.</p> <p>11 Q. When you met Virginia for the first</p> <p>12 time --</p> <p>13 A. Right.</p> <p>14 Q. -- did you think she was an adult</p> <p>15 masseuse, as you use that term?</p> <p>16 A. I don't recall actually meeting</p> <p>17 Virginia at the time, and in fact, were it</p> <p>18 not for this case, I'm not sure I would</p> <p>19 recall her at all.</p> <p>20 Q. But you do recall knowing Virginia?</p> <p>21 A. I do, yes.</p> <p>22 Q. You do recall knowing that Virginia</p> <p>23 was giving Mr. Epstein massages, correct?</p> <p>24 MR. PAGLIUCA: Object to the form</p> <p>25 and foundation.</p>	<p>1 G. Maxwell - Confidential</p> <p>2 thought. I really don't recall her, so it's</p> <p>3 hard for me to testify what I thought about</p> <p>4 her age at the time.</p> <p>5 Q. Was Virginia, in the period of</p> <p>6 around 2000, the youngest person that, as you</p> <p>7 understood it, was giving Mr. Epstein</p> <p>8 massages?</p> <p>9 MR. PAGLIUCA: Object to the form</p> <p>10 and foundation.</p> <p>11 A. Again, I can't testify to her age,</p> <p>12 but everybody else that I can recall seemed</p> <p>13 to be again, like I would say, adults.</p> <p>14 Q. You didn't think Virginia was an</p> <p>15 adult, did you?</p> <p>16 MR. PAGLIUCA: Object to the form</p> <p>17 and foundation.</p> <p>18 A. Like I said, I don't recall her. I</p> <p>19 don't recall thinking about -- my memory is</p> <p>20 of adults giving Jeffrey massages, and as I</p> <p>21 don't really remember Virginia around that</p> <p>22 time, I don't know what I think.</p> <p>23 Q. You do remember Virginia, about</p> <p>24 that time back in the 2000s, giving</p> <p>25 Mr. Epstein massages?</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 A. I believe she was, but I can't say</p> <p>3 for sure.</p> <p>4 Q. Why do you believe Virginia was</p> <p>5 giving Mr. Epstein massages?</p> <p>6 A. Today, because -- but back then.</p> <p>7 Q. Back then?</p> <p>8 A. Because at some point she would</p> <p>9 have been going to the massage room to give</p> <p>10 massages.</p> <p>11 Q. Back then, in the period around</p> <p>12 2000?</p> <p>13 A. Right.</p> <p>14 Q. You believed that Virginia was</p> <p>15 giving Mr. Epstein massages, correct?</p> <p>16 A. I believe I did, yes.</p> <p>17 Q. At the time back in the period</p> <p>18 around 2000 that you believe that Virginia</p> <p>19 was giving Mr. Epstein massages, how old did</p> <p>20 you think Virginia was at the time?</p> <p>21 MR. PAGLIUCA: Object to the form</p> <p>22 and foundation.</p> <p>23 A. I don't believe that I -- I don't</p> <p>24 know what I thought at the time. It's a long</p> <p>25 time ago and I just have no idea what I</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Object to the form</p> <p>3 and foundation.</p> <p>4 A. I barely remember her at all.</p> <p>5 Q. Whether you barely remember her or</p> <p>6 not, you do remember that back in the period</p> <p>7 around 2000, Virginia was giving Mr. Epstein</p> <p>8 massages, right?</p> <p>9 MR. PAGLIUCA: Objection to form</p> <p>10 and foundation.</p> <p>11 A. Only in the most general terms. It</p> <p>12 would be somebody who would give him a</p> <p>13 massage, and that's it.</p> <p>14 Q. During the period of time back in</p> <p>15 the period around 2000, when you knew that</p> <p>16 Virginia was somebody who would give</p> <p>17 Mr. Epstein a massage, was she somebody who</p> <p>18 you considered an adult?</p> <p>19 MR. PAGLIUCA: Objection to form</p> <p>20 and foundation.</p> <p>21 A. I didn't consider her at all</p> <p>22 because she is not somebody that I really</p> <p>23 interacted with.</p> <p>24 Q. It is your testimony that Virginia</p> <p>25 was not somebody that you interacted with, is</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 that what you're saying?</p> <p>3 A. I said I didn't really interact --</p> <p>4 it's not that I didn't interact with her at</p> <p>5 all, but not enough for her to make a very</p> <p>6 strong and lasting impression.</p> <p>7 Q. Is it your testimony that you</p> <p>8 interacted with Virginia, but you didn't</p> <p>9 really interact with Virginia?</p> <p>10 MR. PAGLIUCA: Objection to form</p> <p>11 and foundation.</p> <p>12 A. I don't understand what that</p> <p>13 actually even means.</p> <p>14 Q. You said that you interacted with</p> <p>15 Virginia. Do you recall that?</p> <p>16 A. In the most general terms, I do</p> <p>17 recall her.</p> <p>18 Q. And then you testified that you</p> <p>19 didn't really interact with Virginia. Do you</p> <p>20 recall saying that?</p> <p>21 A. I consider this a real interaction.</p> <p>22 I will not be forgetting this any time soon.</p> <p>23 But the most casual of relationships, where</p> <p>24 you say hello or to be nice or polite, or</p> <p>25 offer someone a glass of water or something</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: We've been going for</p> <p>3 about an hour this morning. I think</p> <p>4 you're probably aware that Ms. Maxwell</p> <p>5 was deposed for a full seven hours on a</p> <p>6 prior occasion. In my view, the court's</p> <p>7 order is limited and we shouldn't be</p> <p>8 covering ground that we covered in the</p> <p>9 prior deposition.</p> <p>10 At some point, we are going to need</p> <p>11 to call the court, if we go at this</p> <p>12 pace, for instruction about length of</p> <p>13 time here, because my view is that this</p> <p>14 is not supposed to be a seven-hour</p> <p>15 deposition, you are not supposed to be</p> <p>16 covering old ground, and you should be</p> <p>17 asking questions related to the, what I</p> <p>18 characterize as the eight discreet areas</p> <p>19 related to a, quote, sexual activity</p> <p>20 which precedes all of the eight items in</p> <p>21 the court's order of July 10th.</p> <p>22 We spent a lot of time not talking</p> <p>23 about those issues, and I suggest we get</p> <p>24 to it or we get the court on the phone</p> <p>25 for some guidance about timing here.</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 is what I would term a casual interaction.</p> <p>3 It is not something that, from what are we</p> <p>4 talking, 17, 18 years ago, something that</p> <p>5 really sticks out in my mind.</p> <p>6 Q. Is it your testimony that your only</p> <p>7 relationship with Virginia was what you</p> <p>8 referred to as a casual relationship where</p> <p>9 you might say hello or offer a glass of water</p> <p>10 to be polite?</p> <p>11 MR. PAGLIUCA: Objection to form</p> <p>12 and foundation.</p> <p>13 A. Generally, yes, that's how I would</p> <p>14 characterize.</p> <p>15 MR. PAGLIUCA: We've been going for</p> <p>16 about an hour. I would like to take a</p> <p>17 break.</p> <p>18 MR. BOIES: Certainly.</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 10:01 a.m., and we are going off the</p> <p>21 record.</p> <p>22 (Recess.)</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 10:10 a.m., and we are back on the</p> <p>25 record. This also begins DVD No. 2.</p>	<p>1 G. Maxwell - Confidential</p> <p>2 MR. BOIES: I'm happy to get the</p> <p>3 court on the phone any time you like. I</p> <p>4 think the questions clearly relate to</p> <p>5 sexual activity.</p> <p>6 MR. PAGLIUCA: How old Virginia</p> <p>7 Roberts was or not does not relate to</p> <p>8 sexual activity. Her memory of how old</p> <p>9 Virginia Roberts may or may not have</p> <p>10 been does not relate to sexual activity,</p> <p>11 and it was all asked and answered in the</p> <p>12 prior deposition.</p> <p>13 MR. BOIES: Your witness introduced</p> <p>14 the subject, asserting that all of these</p> <p>15 people were adults. I didn't ask</p> <p>16 whether they were adults at that time.</p> <p>17 I simply asked a general question that</p> <p>18 was expressly covered by the judge's</p> <p>19 order. Your client opened the door,</p> <p>20 volunteered this and made it necessary</p> <p>21 to do this.</p> <p>22 I am happy to go to the court any</p> <p>23 time you want, and I'm happy to go over</p> <p>24 with the court some of these questions</p> <p>25 and put it in context for the court with</p>

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2 respect to what the documentary evidence
3 is. I'm happy to do that any time you
4 want.

5 MR. PAGLIUCA: Let's get on with it
6 and ask some questions that are relevant
7 to what the court ordered here.

8 MR. BOIES: I am asking questions
9 that I think are clearly relevant. If
10 you don't think so, I invite you to take
11 it to the court. If not, then let me
12 get on with my questions. Any time that
13 I get to a point where you think you
14 want to stop the deposition and go to
15 the court, I am more than prepared to do
16 that.

17 BY MR. BOIES:

18 Q. Ms. Maxwell, during the break, did
19 you have conversations with anyone?

20 A. My lawyers.

21 Q. What did your lawyers say to you?

22 MR. PAGLIUCA: Don't answer that
23 question.

24 Q. What did you say to your lawyer?

25 MR. PAGLIUCA: Don't answer that

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2 question.

3 Q. Did you ask your lawyer for any
4 legal advice?

5 MR. PAGLIUCA: Don't answer that
6 question.

7 Q. Did your lawyer give you any legal
8 advice?

9 MR. PAGLIUCA: Don't answer that
10 question.

11 MR. BOIES: These are all yes or no
12 questions.

13 MR. PAGLIUCA: She is not answering
14 any of those questions, Mr. Boies.

15 Q. Did your lawyer give you advice as
16 to how to answer the questions I was asking?

17 MR. PAGLIUCA: Don't answer that
18 question.

19 Q. Did your lawyer tell you that you
20 were creating problems for yourself with some
21 of your answers?

22 MR. PAGLIUCA: Don't answer that
23 question.

24 Q. Did your lawyer suggest how you
25 might answer some of my questions?

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2 MR. PAGLIUCA: Don't answer that
3 question.

4 Q. Did you have conversations with
5 anyone other than your lawyer during the
6 break?

7 A. No.

8 Q. Did your lawyer tell you why he had
9 taken a break?

10 MR. PAGLIUCA: Don't answer that
11 question.

12 I don't think I did, by the way.

13 MR. BOIES: I'm happy to depose you
14 about it, if you want.

15 MR. PAGLIUCA: Sure.

16 MR. BOIES: I'm serious about that.

17 I'm happy to put you under oath right

18 now, and if you want to start talking

19 about what you did or did not do, I'm

20 happy to interrupt this deposition, put

21 you under oath and let you testify.

22 MR. PAGLIUCA: Ask a question.

23 MR. BOIES: I'm telling you.

24 Otherwise, I suggest you stop making
25 speeches.

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2 MR. PAGLIUCA: Why don't we both
3 stop making speeches.

4 BY MR. BOIES:

5 [REDACTED]

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2 [REDACTED]

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2 [REDACTED]

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2 Epstein's home in Palm Beach?
3 MR. PAGLIUCA: Objection to form
4 and foundation.
5 [REDACTED]

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2 MR. PAGLIUCA: Objection to form
3 and foundation.
4 A. [REDACTED]

8 MR. PAGLIUCA: Objection to form
9 and foundation.
10 A. [REDACTED]

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MR. PAGLIUCA: Objection to form
and foundation.

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2 [REDACTED]

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2 Q. You were aware of how many people
3 gave Mr. Epstein massages?

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

6 A. I was not with him actually very
7 often. I was frequently -- we were
8 frequently not together, so I couldn't know
9 what he would be doing when I wasn't with
10 him.

11 But when we were together, the
12 behavior as described as alleged did not
13 happen, so he would have one massage a day,
14 that would be it.

15 Q. So insofar as you were aware and
16 when you were with Mr. Epstein, he only had
17 one massage a day?

18 A. Yeah.

19 Q. Other than Virginia Roberts, as you
20 understood it at the time, were any of the
21 people that gave Mr. Epstein massages women
22 who were under 21?

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

25 A. I don't know what the ages were of

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2 [REDACTED]

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2 the people who were giving him massages, but
3 I believe they were professional masseuses.

4 Q. I think you testified that you
5 believe that Virginia Roberts was a
6 professional masseuse, is that correct?

7 MR. PAGLIUCA: Objection to form
8 and foundation.

9 A. Based on how allegedly we met,
10 which was at a spa, I believe that when you
11 work at a spa, you are a professional. So
12 I'm basing my statement based on her working
13 as a professional massage person, at a
14 professional spa.

15 Q. When you met Ms. Roberts at the
16 spa, what spa was it?

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

19 A. I don't recall the actual meeting,
20 but based on all the evidence and stories, it
21 was at Mar-a-Lago.

22 Q. You just testified that you met
23 Virginia Roberts at a spa. Do you recall
24 that?

25 MR. PAGLIUCA: Objection to form

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and foundation.

A. I said I don't recall the actual meeting, but based on the evidence that we have been produced, and I now believe it was at Mar-a-Lago that that meeting may have taken place.

Q. When you met Virginia Roberts, did you understand that she was at that time a professional masseuse?

MR. PAGLIUCA: Objection to form and foundation.

A. I don't recall the actual first meeting, I don't know.

Q. Whether or not you recall the actual first meeting, was it your understanding that Virginia Roberts was a professional masseuse?

MR. PAGLIUCA: Objection to form and foundation.

A. I had no idea at the time, but I believe she was working at a spa, and based on what I believe today, she was a masseuse at Mar-a-Lago.

Q. When you say based on what you

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conversations with Virginia. Like I said, I would actually barely remember her at all were it not for this case.

Q. Why, then, do you believe she was a masseuse at Mar-a-Lago?

A. Based on having met her at Mar-a-Lago. I don't know why else she would be at the house.

Q. At what house?

A. Why would she come to Jeffrey's house if she was not a masseuse at Mar-a-Lago, why else would she come.

Q. Did you ask her to come to Jeffrey's house?

A. I don't recall the first meeting or how it went down that she came to give Jeffrey a massage or whatever she came to do. All I remember as I testified in my first deposition is that her mother came and that we sat outside and I talked to her mother, and that she went in and met Jeffrey and then she left. And then subsequent to that, I understand she gave him massages.

Q. My question was a simple yes or no

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believe today, you believe she was a masseuse at Mar-a-Lago, what is it that you've learned that leads you to believe she was a masseuse at Mar-a-Lago?

A. She worked at the spa, and that's all I know, that she was 17 and that she held herself out to be a masseuse.

Q. She told you she was a masseuse?

A. I don't know if she told me at the time she was a masseuse. I believe today she was a masseuse working at Mar-a-Lago and she was 17 years old.

Q. You said she held herself out as a masseuse. Do you recall that?

A. I just said it. The problem is I don't recall with specificity. I don't recall the actual meeting, so events in my mind are conflated with all of her stories, all of the lies that have been told.

So, today, I believe that she was a 17-year-old masseuse at Mar-a-Lago.

Q. Did she ever tell you that she was a masseuse at Mar-a-Lago?

A. I don't recall specific

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question. Did you ask her to come to Jeffrey's house?

A. I can't recall exactly the meeting.

Q. In response, I got a paragraph that makes a number of assertions that I'm now going to have to follow-up. I'm prepared to do that, but in light of your counsel's desire to move the deposition along, I won't have to follow-up things that you volunteer if you don't volunteer them.

So if you will focus on my question, and if it is simply a yes or no answer and you give a yes or no answer, that will shorten the deposition. If you want to say other things, I'm not going to try to stop you, but I am going to follow-up on what you say.

My question now is simply, do you recall, one way or the other, as you sit here now, whether you asked Virginia Roberts to come to Mr. Epstein's house?

A. I do not.

Q. Do you recall, as you sit here now, one way or another, whether Virginia Roberts

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 was a masseuse, a towel girl, a maintenance person or any other type employee at Mar-a-Lago?

A. I do not.

Q. Did Mr. Epstein ever ask you to attempt to obtain or secure people to give him massages that were not professional masseuses?

A. No.

Q. Do you remember somebody by the name of [REDACTED]?

A. I don't believe I ever met him.

Q. You don't believe you ever met him?

A. No.

Q. Do you remember anyone other than yourself who secured or obtained people to give Mr. Epstein massages?

MR. PAGLIUCA: Objection to form and foundation.

A. Can you ask the question again, please?

Q. Do you remember anyone other than yourself who secured or obtained people to give Mr. Epstein massages?

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covered extensively.

MR. BOIES: I understand what the prior deposition --

A. Other than friends of my family and friends of other people's people, and the people that I've identified, I am aware that Jeffrey had friends that came over that brought their kids with them from time to time.

Q. These kids that you refer to, they didn't give Mr. Epstein massages, did they?

MR. PAGLIUCA: Mr. Boies, this has been asked and answered already.

MR. BOIES: I don't think that particular question was asked and answered, but whether it was asked and answered or not, you can instruct not to answer and then we will move on. I think we take much more time with your interjections than we would if you simply let the witness answer the question.

MR. PAGLIUCA: Well, we do, but then we go down this road where you keep

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MR. PAGLIUCA: Objection to form and foundation.

A. I believe Jeffrey did get massages from other people who were recommendations from other people for massages that had nothing to do with me.

Q. Do you know who?

A. I only know what I read. Virginia gave people.

Q. Other than what Virginia had said in the last 10 years, were you aware of anyone who was obtaining people to give Mr. Epstein massages other than yourself?

A. I'm not -- I don't know what other people do. I know that other people recommended massages to him, but I can't testify to what other people do for him or did for him.

Q. Back in the 1990s and the 2000s, did you see women under the age of 21 at Mr. Epstein's houses?

MR. PAGLIUCA: This has been asked and answered in her prior deposition.

Do you understand that? It's been

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asking these questions that have already been asked and answered.

So the witness can answer the question, but let's stick to the topic here.

MR. BOIES: If you want to instruct her not to answer, instruct her not to answer. You are not going to convince me with speeches.

A. What is the question, please?

Q. You referred to friends of Mr. Epstein bringing their kids with them when they came over?

A. Yes.

Q. Those kids, as you described, did not give Mr. Epstein massages, correct?

A. I don't believe so.

Q. Limiting the people that we're talking about just to people who gave Mr. Epstein massages or who were brought to the home to give Mr. Epstein massages, were there people other than you who were responsible for bringing those people to Mr. Epstein's house?

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2 [REDACTED]
3 A. I would not know. I would say no.

4 Q. Did you engage in sexual activities
5 with [REDACTED]

6 A. No.

7 Q. Do you know how [REDACTED] came to
8 know Mr. Epstein?

9 A. I met her at her university [REDACTED]

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 A. In Palm Beach.

14 Q. At Mr. Epstein's home in Palm
15 Beach?

16 A. Yes.

17 Q. So is it fair to say that [REDACTED]
18 [REDACTED]
19 [REDACTED]

20 MR. PAGLIUCA: This has already
21 been testified to Mr. Boies. We are
22 repeating testimony now.

23 MR. BOIES: I think in the context
24 of the witness' answers, these are fair
25 questions.

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2 Now, I've asked you before, if you
3 want to instruct her not to answer, if
4 you want to go to the judge, we are
5 happy to do that, but I would suggest,
6 in the interest of moving it along, that
7 you stop these speeches.

8 MR. PAGLIUCA: You are not moving
9 it along is the problem, so maybe we
10 should call the court and get some
11 direction here, because I am not going
12 to sit here and rehash the testimony we
13 already gave.

14 MR. BOIES: That's fine.

15 THE VIDEOGRAPHER: The time is
16 10:51 a.m. and we are going off the
17 record.

18 (Whereupon, an off-the-record
19 discussion was held.)

20 THE VIDEOGRAPHER: The time is
21 10:56 a.m. and we are going back on the
22 record. This begins DVD No. 3.

23 MR. BOIES: We have just had a call
24 with Judge Sweet's chambers, Judge Sweet
25 is not available and his chambers

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2 instructed that the right way to do it
3 was to bring any issue to him after the
4 conclusion of the deposition.

5 The question that has been raised
6 is whether we should interrupt the
7 deposition now and seek guidance of the
8 court before continuing the deposition.

9 My view is that the deposition
10 needs to continue, and the counsel for
11 the defendant can instruct not to answer
12 and any questions that are instructed
13 not to answer can be brought to the
14 court, but I would not consent to
15 terminating the deposition at this
16 point.

17 MR. PAGLIUCA: I don't know if it's
18 a matter of consent or not. If I move
19 for a protective order, the deposition
20 is over and we can go litigate it in
21 front of Judge Sweet. We are here and
22 I'd like to complete this deposition
23 because this case needs to move along,
24 and quite frankly, I don't want to spend
25 money coming back here to do this again

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2 or argue this in front of Judge Sweet.

3 But I will simply start referring
4 you back to the transcript and
5 instructing the witness not to answer
6 when I think we are getting into some
7 things that have been asked and answered
8 already.

9 MR. BOIES: Exactly the procedure
10 that I have proposed from the beginning.
11 If you think a question is out of
12 bounds, instruct not to answer and we
13 will then let the judge decide it.

14 BY MR. BOIES:

15 Q. How did it happen, Ms. Maxwell,
16 that [REDACTED]
17 [REDACTED], ended up giving massages to you
18 and Mr. Epstein?

19 MR. PAGLIUCA: I'm going to
20 instruct you not to answer the question.
21 This has been previously, the subject of
22 your former deposition, it doesn't fall
23 into any of the categories ordered by
24 the court, and so you don't need to
25 answer that.

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2 Q. Was [REDACTED] paid for the massages
3 that she gave you?

4 A. I didn't pay her, so I believe she
5 was paid.

6 Q. Who paid her?

7 A. I don't know who paid her.

8 MR. PAGLIUCA: Again, you've
9 already answered that there was no
10 sexual activity between yourself and
11 Mr. Epstein related to these massages.
12 That's record testimony today. That's
13 within the scope of the court's order.
14 The rest of this is outside the scope of
15 the court's order, and I instruct you
16 not to answer.

17 MR. BOIES: You are taking the
18 position that as long as she said says
19 that a massage did not involve sexual
20 activity, we cannot ask about massages.
21 That's your view?

22 MR. PAGLIUCA: On this particular
23 questioning, yes.

24 BY MR. BOIES:

25 Q. Did Mr. Epstein pay [REDACTED] for the

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2 massages that she gave Mr. Epstein?

3 MR. PAGLIUCA: You just asked this
4 question, and I told her not to answer.
5 I will tell her not to answer again for
6 the same reasons.

7 Q. Do you know how much Mr. Epstein
8 paid Johanna to give massages?

9 MR. PAGLIUCA: Same instruction to
10 the witness. Why do you believe this is
11 within the scope of the court's order?

12 MR. BOIES: Because of the court's
13 reference to massages, and because I
14 think how much a girl [REDACTED]
15 [REDACTED] was paid to give a
16 "massage" goes to whether there actually
17 was or was not sexual activity involved.

18 MR. PAGLIUCA: The witness has
19 testified there wasn't.

20 MR. BOIES: Perhaps it will
21 surprise you, I think it should not,
22 that I do not believe in my deposition I
23 need to simply accept her
24 characterization without
25 cross-examination. Now, that's

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2 something the judge can decide, but a
3 question as to how much this young girl
4 was being paid for a "massage", I think
5 goes directly to the issue of sexual
6 activity.

7 MR. PAGLIUCA: Here is the problem,
8 Mr. Boies, at the first deposition,
9 there were very limited instructions not
10 to answer and the witness was not told
11 not to answer questions about how much
12 people were paid or not paid or any of
13 those subject matters. The witness was
14 only instructed not to answer about
15 sexual activity concerning adults in the
16 home.

17 None of this came up during the
18 deposition, and you just don't get a
19 chance to redo the deposition because
20 you feel like you want to.

21 So the judge's order is in the
22 context of the instructions to the
23 witness not to answer in the first
24 deposition, which is simply sexual
25 activity involving adults, which was the

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2 only area that the witness was precluded
3 from talking about in the first
4 deposition. So that's where we're at.

5 MR. BOIES: I think that directly
6 misreads the judge's order, including
7 where it says: Defendant is ordered to
8 answer questions relating to defendant's
9 own sexual activity with or involving
10 Jeffrey Epstein, with or involving
11 plaintiff, with or involving underage
12 females, involving or including massage
13 with individuals defendant knew to be or
14 believed might become known to Epstein.

15 MR. PAGLIUCA: All of it is
16 preceded by the word sexual activity.

17 MR. BOIES: I think your point of
18 view is an interesting one, but we will
19 see what the judge rules on it.

20 BY MR. BOIES:

21 [REDACTED]

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2 and foundation.

3 A. [REDACTED]

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

10 A. I don't know.

11 Q. Did any of them give you massages?

12 A. No.

13 Q. [REDACTED]

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

19 A. No.

20 Q. Were they ever in the Virgin
21 Islands?

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

24 A. No.

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

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2 [REDACTED]

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2 [REDACTED]

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2 it to something in the case.

3 MR. BOIES: I think it's tied, but
4 if you instruct her not to answer, it
5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]

14 A. Can you repeat the question?

15 Q. [REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [REDACTED]

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25 Q. Do you know [REDACTED]

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2 [REDACTED]
3 A. I do.

4 MR. BOIES: Let me show you a
5 document that has been marked for
6 identification as Maxwell Deposition
7 Exhibit 27.

8 (Maxwell Exhibit 27, Article,
9 marked for identification, as of this
10 date.)

11 MR. PAGLIUCA: I'm going to need a
12 moment to review this, counsel.

13 MR. BOIES: Sure. Let me know when
14 you are finished.

15 MR. PAGLIUCA: I will.

16 Okay.

17 BY MR. BOIES:

18 Q. Did you see this article prior to
19 the time I'm showing it to you?

20 A. No.

21 Q. This is the first time you have
22 seen this article?

23 A. Yes.

24 Q. When did you first meet [REDACTED]

25 MR. PAGLIUCA: You are not

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2 [REDACTED]
3 Q. Who was [REDACTED]

4 A. [REDACTED]

5 [REDACTED]
6 Q. [REDACTED]

7 [REDACTED]
8 A. Uh-huh.

9 Q. Who was [REDACTED]

10 A. [REDACTED]

13 Q. Did you know [REDACTED]

14 A. I did.

15 Q. When did you first meet [REDACTED]

16 [REDACTED]
17 A. I don't recall.

18 Q. Did you see [REDACTED] at
19 Mr. Epstein's house in Palm Beach?

20 A. No, I don't think so.

21 Q. Where did you see [REDACTED]

22 A. I believe I met her in New York at
23 some point.

24 Q. Did you see [REDACTED] at
25 Mr. Epstein's house in New York?

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2 answering those questions. That has
3 nothing to do with what we're here for
4 today. We will take that up with the
5 judge, if we need to.

6 Q. Let me direct your attention to a
7 portion of this article. Did [REDACTED] ever
8 talk to you about women that she believed
9 Mr. Epstein had had sex with?

10 MR. PAGLIUCA: Don't answer that
11 question. We will take that up with the
12 judge.

13 MR. BOIES: Okay.

14 Q. Did [REDACTED] ever mention to you a

15 [REDACTED]
16 A. She did.

17 Q. Did [REDACTED] ever mention to you an

18 [REDACTED]
19 A. She did.

20 Q. When did [REDACTED]

21 [REDACTED]
22 A. She called me and asked me, I don't
23 know if she mentioned -- I want to take that
24 back. I don't know if she mentioned [REDACTED]

25 [REDACTED]. I think she just mentioned [REDACTED]

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2 A. I don't recall meeting her there,
3 but -- I may have, but I don't recall.

4 Q. Did you ever meet [REDACTED]

5 A. I did.

6 Q. Where did you meet [REDACTED]

7 A. She was in New Mexico.

8 Q. At Mr. Epstein's property in New
9 Mexico?

10 A. Yes.

11 Q. And did Mr. Epstein ever have sex
12 with [REDACTED]

13 A. I have no idea.

14 Q. Did Mr. Epstein ever engage in
15 sexual activities with [REDACTED]

16 A. I have no idea.

17 Q. Did Mr. Epstein ever engage in
18 sexual activities with [REDACTED]

19 A. I don't know, I don't think so.

20 Q. Did [REDACTED] ever work for
21 Mr. Epstein?

22 A. I don't know.

23 Q. Did [REDACTED] ever visit you at
24 your apartment?

25 A. I don't recall her ever coming.

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 2 Q. Did you ever fly on Mr. Epstein's
 3 plane with [REDACTED]
 4 A. I don't remember.
 5 Q. Did you ever fly on Mr. Epstein's
 6 plane with [REDACTED]
 7 A. I don't think so.
 8 Q. Did [REDACTED] ever give
 9 Mr. Epstein a massage?
 10 A. I don't -- I have no idea.
 11 Q. Did [REDACTED]
 12 [REDACTED]
 13 A. I don't recall.
 14 Q. What did [REDACTED] tell you about
 15 [REDACTED] when she talked to you?
 16 MR. PAGLIUCA: You don't have to
 17 answer that. That has nothing to do
 18 with the court's order and why we are
 19 here.
 20 Q. Did [REDACTED]
 21 [REDACTED]
 22 [REDACTED] had said that Mr. Epstein had engaged
 23 in sexual activities with her?
 24 A. She never said that.
 25 Q. Excuse me?

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 2 A. I don't recall ever hearing such a
 3 thing.
 4 Q. You know [REDACTED], correct?
 5 A. I do.
 6 Q. Do you know whether or not [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 MR. PAGLIUCA: Can you tell me how
 10 that relates to this order, counselor?
 11 MR. BOIES: Yes, I think it goes
 12 directly to the sexual activity related
 13 to [REDACTED] and what Mr. Epstein was
 14 doing with [REDACTED]
 15 Again, you can instruct not to
 16 answer.
 17 MR. PAGLIUCA: I'm trying to
 18 understand why you are asking these
 19 questions before I --
 20 MR. BOIES: I'm asking these
 21 questions because these are people who
 22 not only have been publicly written
 23 about in terms of the sexual activity
 24 that they were put into in connection
 25 with Mr. Epstein, but the person who

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 2 wrote about them is somebody who talked
 3 to this witness about it, and I think
 4 that this is more than easily understood
 5 cross-examination.
 6 MR. PAGLIUCA: Your question was,
 7 do you know whether or not [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 MR. BOIES: Yes. And if you let
 11 her answer, you will see where it leads.
 12 If you won't let her answer, the judge
 13 is going to determine it. And I just
 14 suggest to you that you stop these
 15 speeches and stop debating, because you
 16 are not going to convince me not to
 17 follow-up on these questions. If you
 18 can convince the court to truncate the
 19 deposition, that's your right, but all
 20 you're doing is dragging this deposition
 21 out.
 22 MR. PAGLIUCA: You have the
 23 opportunity to give me a good faith
 24 basis why you are asking these
 25 questions.

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 2 MR. BOIES: I have given you a good
 3 faith basis.
 4 MR. PAGLIUCA: You haven't.
 5 MR. BOIES: Then instruct not to
 6 answer.
 7 MR. PAGLIUCA: I am giving you the
 8 opportunity to say why you are asking
 9 the question, and why I'm telling her
 10 not to answer and I am entitled to know
 11 that.
 12 MR. BOIES: You are not entitled to
 13 know why I'm asking the question. You
 14 are only entitled to know that it
 15 relates to the subject matter that I am
 16 entitled to inquire about, and I don't
 17 think the judge is going to think that,
 18 you know, where Mr. Epstein shipped
 19 [REDACTED] off to is outside the scope
 20 of what I'm entitled to inquire about.
 21 THE WITNESS: Can we take a break?
 22 MR. BOIES: Only if you commit not
 23 to talk to your counsel during the
 24 break.
 25 THE WITNESS: That's ludicrous.

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2 MR. BOIES: You want a break to
3 talk to your counsel, right?

4 THE WITNESS: I want to use the
5 bathroom.

6 MR. BOIES: You want to talk to
7 your counsel, right?

8 THE WITNESS: I talk to my counsel
9 all the time.

10 MR. BOIES: I don't want you
11 talking to your counsel while I'm in the
12 middle of this examination.

13 MR. PAGLIUCA: I'm going to talk to
14 her, so are we going to sit here and go
15 for the rest of the day until we're
16 done?

17 MR. BOIES: No, but I'm going to go
18 through the rest of this line of
19 questioning, unless you take her and
20 walk out and then, I'm going to protest
21 that to the judge.

22 MR. PAGLIUCA: He is refusing a
23 bathroom break to you right now.

24 MR. BOIES: No, I'm not. I'm happy
25 to have her take a bathroom break as

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2 long as she doesn't use it as an excuse
3 to get coached by her lawyer.

4 THE WITNESS: For the record, I
5 want to object strongly to that.

6 MR. PAGLIUCA: You don't talk now.
7 Do you want to go to the bathroom?

8 THE WITNESS: Yes.

9 MR. PAGLIUCA: How about if I stay
10 here, Mr. Boies, will that work for you?

11 MR. BOIES: Absolutely.

12 THE VIDEOGRAPHER: The time is
13 11:31, and we are going off the record.

14 (Recess.)

15 THE VIDEOGRAPHER: The time is
16 11:34 a.m. and we are back on the
17 record. This also begins DVD No. 4.

18 BY MR. BOIES:

19 Q. Let me approach it this way. If
20 you turn to page 5 of 7 of the exhibit that
21 is Vicky Ward's Daily Beast article. And if
22 you look at the third paragraph where Ms.
23 Ward writes: What I had "on the girls" were
24 some remarkably brave first-person accounts.
25 Three on-the-record stories from the family,

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2 a mother and her daughters who came from
3 Phoenix. The oldest daughter, an artist,
4 whose character was vouchsafed to me by
5 several sources, including the artist, Eric
6 Fischl, had told me weeping as she sat in my
7 living room, of how Epstein had attempted to
8 seduce both her and separately and her
9 younger sister, then only 16."

10 Did Ms. Ward tell you that?

11 A. No.

12 Q. Did Ms. Ward tell you that her
13 information was that [REDACTED]

15 A. No.

16 Q. Did you and Mr. Epstein visit [REDACTED]

18 A. I don't know I would characterize
19 the word visit with Mr. Epstein. We went for
20 business in Ohio because [REDACTED]
21 [REDACTED], and I accompanied him on a few
22 visits.

23 Q. Did you and Mr. Epstein go to Ohio,
24 and while you were in Ohio, see [REDACTED]

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2 A. I believe actually that she was --
3 stayed at his house there, so I would have
4 seen her at the house. I believe I do recall
5 seeing her at the house, actually.

6 Q. When you say she stayed at the
7 house, you are referring to [REDACTED]

8 A. Yeah, I think [REDACTED] was
9 painting or something in Ohio, and he let her
10 stay at a place that he had.

11 Q. When you say "he" let her stay, you
12 are talking about [REDACTED]

13 A. No, I'm talking about Jeffrey
14 Epstein.

15 Q. So when you saw [REDACTED] in
16 Ohio, it was your understanding that she was
17 staying at property that Mr. Epstein had in
18 Ohio, is that correct?

19 A. I don't know if it was his property
20 or he rented it, I don't know what the nature
21 was. It was a property that he had that she
22 stayed at.

23 Q. [REDACTED] was staying in Ohio at
24 some property, and you don't know whose
25 property it was, is that fair?

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2 A. I don't know what -- I don't know
3 who owned -- I don't know anything about the
4 ownership of the property or how Jeffrey had
5 it or why he stayed there, I don't know.

6 Q. Was it clear to you that Jeffrey
7 had arranged for [REDACTED] to stay at
8 wherever she was staying in Ohio?

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

11 A. I have no idea what the arrangement
12 was between [REDACTED] and Jeffrey.

13 Q. When you referred to the property
14 where [REDACTED] was staying, you said you
15 didn't know how Jeffrey had it?

16 A. What's your question?

17 Q. Was it your understanding that
18 Jeffrey did have that property that she was
19 staying at in some capacity or another,
20 either owning it or leasing it or having been
21 given it by a friend?

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

24 A. I have no idea.

25 Q. Where was this property that you

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2 house in Columbus, Ohio, correct?

3 A. I don't know the arrangement that
4 [REDACTED] had with Jeffrey. I believe she
5 was painting there, but I was never aware of
6 the arrangement. I know that I saw her in
7 Ohio at a house.

8 Q. When you were with [REDACTED] at
9 this house in Columbus, Ohio, Mr. Epstein was
10 with you, correct?

11 A. I went to Ohio with him on
12 business, and we were at a house that he
13 could stay at and I stayed at, and I recall
14 [REDACTED] being at this house. That is
15 what I recall.

16 Q. When you went to Ohio with
17 Mr. Epstein, did you see [REDACTED] on more
18 than one occasion?

19 A. I don't recall.

20 Q. You saw [REDACTED] in Ohio with
21 Mr. Epstein on at least one occasion,
22 correct?

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

25 A. I recall seeing her in Ohio, but I

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2 and Mr. Epstein visited [REDACTED] at in
3 Ohio?

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

6 A. It was in Columbus.

7 Q. Was it a house or an apartment?

8 A. It was a house.

9 Q. When you and Mr. Epstein visited
10 [REDACTED] at this house in Columbus, was
11 anyone else in the house?

12 A. I never visited [REDACTED] at the
13 house.

14 Q. Did you see [REDACTED] in Ohio?

15 A. I recall seeing her, but I didn't
16 visit. I didn't go to Ohio to see [REDACTED].

17 Q. When you went to Ohio, did you see
18 [REDACTED]

19 A. I recall seeing [REDACTED] in
20 Ohio.

21 Q. Where did you see her?

22 A. I recall seeing her at this house
23 that Jeffrey stayed at.

24 Q. [REDACTED] was staying in the

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2 couldn't tell you how many times I saw her.
3 For sure once, because I have a recollection
4 of seeing her once.

5 Q. And the house in which you and
6 Mr. Epstein and [REDACTED] were in
7 Columbus, Ohio, was that a house that you and
8 Mr. Epstein were staying in overnight?

9 A. I stayed overnight there.

10 Q. Was [REDACTED] staying there
11 overnight?

12 A. I don't recall.

13 Q. How many nights did you and
14 Mr. Epstein stay in this house in Columbus?

15 A. I don't recall.

16 Q. Was it more than one?

17 A. I don't recall.

18 Q. The night or nights that you and
19 Mr. Epstein stayed at this house in Columbus,
20 was [REDACTED] there?

21 A. I don't recall.

22 Q. When you saw [REDACTED] in Ohio,
23 did you talk to her?

24 A. I'm assuming I must have said
25 hello, so yes.

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 2 Q. Other than assuming you may have
 3 said hello, did you have any conversations
 4 with her?
 5 A. Not that I recall.
 6 Q. Did [REDACTED] complain to you or
 7 Mr. Epstein about anything?
 8 MR. PAGLIUCA: Objection to form
 9 and foundation.
 10 A. I don't know what she would have
 11 done if she complained to Jeffrey about
 12 anything, but she didn't complain to me, as
 13 far as I recall.
 14 Q. As far as you know, she didn't
 15 complain to Mr. Epstein., is that correct?
 16 A. I have no knowledge of what she did
 17 or didn't do in that regard.
 18 Q. Did she call the police or threaten
 19 to call the police because of anything that
 20 either you or Mr. Epstein did?
 21 MR. PAGLIUCA: Objection to form
 22 and foundation.
 23 A. I never ever heard that.
 24 Q. [REDACTED] didn't tell you, is your
 25 testimony?

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 2 MR. PAGLIUCA: Objection to form
 3 and foundation.
 4 A. My testimony is I never heard that,
 5 period.
 6 Q. That includes, I assume, that you
 7 never heard that from [REDACTED] that's your
 8 testimony?
 9 MR. PAGLIUCA: Objection to form
 10 and foundation.
 11 A. I think you can safely say if
 12 you've never heard it at all, it would
 13 encompass anybody at all. It means you never
 14 heard it, period.
 15 Q. Did you ever see [REDACTED] in
 16 Ohio?
 17 A. Not that I recall.
 18 Q. Where did you last see [REDACTED]
 19 [REDACTED]
 20 A. I only recall seeing her at the
 21 ranch.
 22 Q. In New Mexico?
 23 A. Yeah.
 24 Q. Other than seeing [REDACTED] at
 25 Mr. Epstein's place in New Mexico, did you

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 2 ever see [REDACTED]
 3 A. I don't recall ever seeing her.
 4 Q. [REDACTED]
 5 [REDACTED]
 6 A. [REDACTED]
 7 Q. Did [REDACTED] ever engage in any
 8 sexual activity with Mr. Epstein?
 9 A. I wouldn't know. I would assume
 10 not, but I don't know.
 11 Q. Do you have any reason to believe
 12 that Mr. Epstein engaged in any sexual
 13 activity with [REDACTED]
 14 MR. PAGLIUCA: Objection to form
 15 and foundation.
 16 A. I wouldn't know.
 17 Q. Did you ever give a massage to
 18 anyone other than Mr. Epstein at any of Mr.
 19 Epstein's properties?
 20 A. First of all, I never said I gave
 21 Mr. Epstein a massage.
 22 Q. I will ask that question if you
 23 want, but I was focusing on people other than
 24 Mr. Epstein right now.
 25 A. I don't give massages.

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 2 Q. Let's just tie that down. It is
 3 your testimony that you've never given
 4 anybody a massage?
 5 A. I have not given anyone a massage.
 6 Q. You never gave Mr. Epstein a
 7 massage, is that your testimony?
 8 A. That is my testimony.
 9 Q. You never gave [REDACTED] a
 10 massage is your testimony?
 11 A. I never gave [REDACTED] a
 12 massage.
 13 Q. Did you, or to your knowledge,
 14 Mr. Epstein pay for [REDACTED] to go to
 15 Thailand?
 16 MR. PAGLIUCA: Objection to form
 17 and foundation.
 18 A. I am not aware.
 19 Q. Do you know whether [REDACTED]
 20 went to Thailand?
 21 A. I have no knowledge of anything
 22 like that.
 23 Q. Did you ever give anyone
 24 instructions as to how to give a massage?
 25 MR. PAGLIUCA: Objection to form

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2 and foundation.

3 A. No. With a clarification, I do --

4 I have very -- how to massage feet, pressure
5 points on a foot and pressure points on a
6 hand.

7 Q. Is what you're saying is that you
8 gave people instructions as to how to massage
9 feet and hands?

10 A. I have never given any
11 instructions. I have shown where pressure
12 points are on a hand and on a foot, but I
13 have never given instructions on how to do
14 it. I have demonstrated where a pressure
15 point on a hand and a foot is.

16 Q. Did you do that demonstration with
17 people who were giving or were planning to
18 give Mr. Epstein massages?

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

21 A. No, just in general, something
22 that I know how to do, so it would be just as
23 a general thing I have done.

24 Q. When you talk about general thing
25 you have done, is to tell people where the

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2 people how to give massage. Did you do that?

3 A. I have not done that.

4 Q. Did you ever tell or show people
5 how to give Mr. Epstein a massage?

6 A. No.

7 Q. Did you ever tell or show people at
8 Mr. Epstein's properties how to give
9 massages?

10 A. No.

11 Q. Did you at any time, at any of
12 Mr. Epstein's properties, tell or show anyone
13 how to give massages or how Mr. Epstein liked
14 massages?

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

17 A. No. I think Mr. Epstein is
18 perfectly capable --

19 MR. PAGLIUCA: There is no question
20 pending.

21 Q. Did Mr. Epstein, in your presence,
22 ever tell or show anyone how he liked
23 massages?

24 A. I don't recall.

25 Q. Did Mr. Epstein ever tell you how

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2 pressure points are on hands and feet?

3 A. Yes.

4 Q. Did you ever use that knowledge to
5 try to show someone who was giving or was
6 planning to give Mr. Epstein a massage how to
7 do it?

8 MR. PAGLIUCA: Objection to form
9 and foundation. Asked and answered.

10 A. I am not aware of ever having done
11 that, but I am aware of having shown people
12 that there is a pressure point on the hand
13 and foot. I have no specific knowledge of
14 who. Just in general, I have done it.

15 Q. Did you show people pressure points
16 on hands and feet in Mr. Epstein's house in
17 Palm Beach?

18 A. I don't recall with specificity
19 where. I just know I do it because it's just
20 something that I happen to know, it helps
21 people, something I know.

22 Q. What I'm trying to be sure that I
23 have your testimony on is whether at any of
24 Mr. Epstein's properties, whether you call it
25 instructions or not, told people or showed

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2 he liked or didn't like massages given by any
3 particular person?

4 A. I can't recall.

5 Q. In other words, did he ever praise
6 to you or compliment to you some massage that
7 he had gotten or some person who had given
8 him a massage?

9 A. I'm sure in the course of time he
10 did, but I can't recall.

11 Q. Did he ever complain to you or
12 criticize the massage that anyone gave him?

13 A. Again, I don't recall.

14 Q. You know [REDACTED]
15 [REDACTED], correct?

16 A. I do.

17 Q. Did Mr. Epstein, insofar as you
18 have any reason to believe, ever engage in
19 sexual activities with her?

20 A. I have no knowledge.

21 Q. Did you ever engage in sexual
22 activities with [REDACTED]

23 A. No.

24 Q. Have you had any conversations with
25 [REDACTED] about Mr. Epstein's

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 massages or sexual activities?

MR. PAGLIUCA: Objection to form
 and foundation.

A. No.

Q. When was the last time you had any
 communications with [REDACTED]

A. A long time ago. So long, I don't
 recall.

Q. Were you aware that [REDACTED]
 [REDACTED] was noticed for a deposition in this
 case?

A. I believe I did know that, yes.

Q. Did you have any conversations with
 anyone as to whether or not [REDACTED]
 [REDACTED] would or should show up for that
 deposition?

MR. PAGLIUCA: Wait a minute, what
 does that have to do with the court's
 order. Don't answer that question.
 Just don't answer it. This is silly.

MR. BOIES: I actually think it is
 far from silly. I think it goes to an
 obstruction of justice situation that I
 think you would be well advised to allow

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at all improper. I am not making any
 assertions. I'm simply asking
 questions. I'm trying to find out what
 the facts are.

MR. PAGLIUCA: No, you are not.

MR. BOIES: Yes, I am. You are
 trying to keep the facts from coming
 out.

MR. PAGLIUCA: No, I'm not. I'm
 trying to keep this orderly and not
 abusive as to where it is going.

MR. BOIES: This is so far from
 abusive.

MR. PAGLIUCA: I think we should
 take a lunch break, given it is noon.

MR. BOIES: We will do it in a half
 hour, I want to finish this line of
 questioning. I will guarantee we are
 out by 12:30.

BY MR. BOIES:

Q. Let me ask you about a few other
 people.

[REDACTED], do you know her?

A. I do.

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 your client to answer the question on.

MR. PAGLIUCA: Do you have a good
 faith basis to suggest that she
 suggested that [REDACTED] not show up at
 her deposition yesterday?

MR. BOIES: I don't know whether it
 was you, I don't know whether it was
 her, I don't know who did it. What I do
 know is that she didn't show up, and I
 think the evidence will be quite clear
 that your client's testimony about the
 extent of her relationship with [REDACTED]
 [REDACTED] is not accurate.

And in that context, I think the
 circumstances under which it turns out
 that she doesn't show up is entirely
 appropriate for examination, but that is
 something that I'm happy to talk to the
 judge about.

MR. PAGLIUCA: Sure. And I hope
 that you give him some good faith basis
 for the assertions that you are making
 here today, which are wholly improper.

MR. BOIES: I don't think they are

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Q. Is she anyone with whom Mr. Epstein
 had sex?

MR. PAGLIUCA: Objection to form
 and foundation.

A. I have no idea.

Q. Is she anyone with whom Mr. Epstein
 engaged in sexual activities?

MR. PAGLIUCA: Objection to form
 and foundation.

A. I have no personal knowledge.

Q. When you say you have no personal
 knowledge, what do you mean by personal
 knowledge?

A. I mean that I've read the police
 reports, so that's the only knowledge I have
 of what [REDACTED] or anybody else has with
 Jeffrey. I have no way of knowing whether
 they did or not. Personal knowledge means
 did I know myself.

Q. After you saw the police reports
 about Mr. Epstein's relations with [REDACTED]
 [REDACTED], did you ever talk to Mr. Epstein
 about whether or not that police report was
 or was not accurate?

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 2 A. I have not.
 3 Q. You did communicate with
 4 Mr. Epstein after you saw that police report,
 5 correct?
 6 MR. PAGLIUCA: Objection to form
 7 and foundation.
 8 A. I don't know that's true.
 9 Q. When did you see the police report?
 10 MR. PAGLIUCA: If this involves
 11 communications with me, I'm going to
 12 instruct you not to answer the
 13 questions.
 14 Q. Is it your testimony that the only
 15 time you saw the police reports was when it
 16 was shown to you by your counsel?
 17 A. That's the only time I recollect.
 18 Q. What?
 19 A. That's the only time I remember
 20 seeing it.
 21 Q. When did your counsel show you the
 22 police report?
 23 MR. PAGLIUCA: If you remember, you
 24 can answer that question.
 25 A. I don't know. I guess recently,

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1 G. Maxwell - Confidential
 2 but I don't recall.
 3 Q. In the last 30 days?
 4 A. I really don't remember when I saw
 5 it.
 6 Q. Was the first time that you saw the
 7 police report sometime this calendar year
 8 2016?
 9 A. I don't remember when I've seen
 10 them. It's in the course of this latest
 11 lies.
 12 Q. What do you mean, in the course of
 13 this latest lies?
 14 A. In the course of this defamation
 15 suit.
 16 Q. And you may not be able to answer
 17 this, but if you can, I just want to know.
 18 When you saw the police report in the course
 19 of this defamation suit, was it this calendar
 20 year, that is 2016, sometime?
 21 A. I don't know, I'm sorry, I have no
 22 memory.
 23 Q. When is the last time you had a
 24 conversation or communication with
 25 Mr. Epstein?

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 2 A. A very long time ago.
 3 Q. How long?
 4 A. I think two years ago, something
 5 like that.
 6 Q. Before this defamation lawsuit?
 7 A. Excuse me?
 8 Q. Before this defamation lawsuit?
 9 A. You are asking if I communicated
 10 with him before the defamation? What are you
 11 asking me?
 12 Q. Have you communicated with
 13 Mr. Epstein since this defamation lawsuit was
 14 filed?
 15 A. I don't believe I have. I haven't
 16 spoken to him -- no, I don't think so. I
 17 don't remember when it was filed, no, I don't
 18 think so.
 19 Q. By communication, I don't mean just
 20 speaking to him. I mean writing him a
 21 letter, email, communicated in any way?
 22 A. No.
 23 Q. When you say no, does that mean you
 24 have not communicated with Mr. Epstein in any
 25 way since this lawsuit was filed?

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1 G. Maxwell - Confidential
 2 A. I don't recall any communications
 3 with him since this lawsuit has been filed.
 4 Q. Did you ever discuss [REDACTED]
 5 [REDACTED] with Mr. Epstein?
 6 MR. PAGLIUCA: Objection to form
 7 and foundation.
 8 A. I would have had conversations with
 9 him in general terms. Obviously I talked
 10 about her with him but not in any context of
 11 this situation. Just I will have talked to
 12 him about her.
 13 Q. When was the last time you talked
 14 to Mr. Epstein about [REDACTED]
 15 A. Probably in 2003, 2002.
 16 Q. What was the subject matter of that
 17 conversation?
 18 A. I have no idea.
 19 Q. Did it have anything to do with
 20 Mr. Epstein's relationship with [REDACTED]
 21 [REDACTED]
 22 A. No, I have no idea. It would have
 23 nothing to do with anything other than a
 24 work-related issue.
 25 Q. Did [REDACTED] work for

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 2 Mr. Epstein?
 3 A. I believe she did.
 4 Q. Was she working for Mr. Epstein in
 5 2003?
 6 A. I believe she was.
 7 Q. What was her job?
 8 A. I don't exactly know what her job,
 9 her responsibilities were.
 10 Q. Do you know any of job
 11 responsibilities?
 12 A. I believe she traveled with him and
 13 help managed the houses and run the staff and
 14 whatever else he asked her to do. She worked
 15 for Mr. Epstein, so you would have to ask
 16 him.
 17 Q. Was it your understanding that
 18 [REDACTED] at some point had had a
 19 sexual or romantic relationship with
 20 Mr. Epstein?
 21 A. I have no knowledge of that.
 22 Q. Let me go back to [REDACTED].
 23 Did you know, yourself, [REDACTED].
 24 A. I met her.
 25 Q. Where did you meet her?

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 2 A. I don't recall where I met her, I
 3 just don't.
 4 Q. Did you meet her at one of
 5 Mr. Epstein's properties?
 6 A. It's possible, but I don't recall
 7 where I met her.
 8 Q. Did you ever see [REDACTED] at any of
 9 Mr. Epstein's properties?
 10 A. I believe that -- I believe on the
 11 island, I recall, maybe.
 12 Q. Virgin Islands?
 13 A. Virgin Islands.
 14 Q. Did [REDACTED] work for Mr. Epstein?
 15 A. I don't know.
 16 Q. Did [REDACTED] travel with Mr. Epstein?
 17 A. I don't know. If she was on the
 18 island, then presumably she did. I don't
 19 recall.
 20 Q. Did you ever see [REDACTED]
 21 at any of Mr. Epstein's properties other than
 22 in the Virgin Islands?
 23 A. Not that I recall.
 24 Q. Leaving aside anything that you
 25 have learned since this defamation suit

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1 G. Maxwell - Confidential
 2 started, did you have any reason to believe
 3 that Mr. Epstein had engaged in sexual
 4 activities with [REDACTED]
 5 MR. PAGLIUCA: Objection to form
 6 and foundation.
 7 A. I don't -- I have no idea. It
 8 wouldn't be something I think about.
 9 Q. I'm sorry, say that again?
 10 A. I would have no idea.
 11 Q. Did [REDACTED], insofar as
 12 you were aware, ever give Mr. Epstein a
 13 massage?
 14 A. I have no idea.
 15 Q. Did you ever see her go into the
 16 massage room?
 17 A. Not that I recall, no.
 18 Q. Did you ever tell [REDACTED]
 19 that Mr. Epstein wanted her in the massage
 20 room?
 21 A. No.
 22 Q. Did you ever have any discussions
 23 with Mr. Epstein about [REDACTED]
 24 A. None.
 25 Q. Did you ever have any discussions

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 2 with [REDACTED] about Mr. Epstein?
 3 A. None.
 4 Q. Do you know how much money, if any,
 5 Mr. Epstein paid [REDACTED]
 6 A. I have no idea, no, I have no idea.
 7 Q. Do you know whether Mr. Epstein
 8 paid [REDACTED], even if you don't know
 9 the amount?
 10 A. No, I would not know that.
 11 Actually, I don't, I don't recall any
 12 conversation --
 13 MR. PAGLIUCA: There is no question
 14 pending.
 15 Q. Do you know who [REDACTED]
 16 is?
 17 A. Yes.
 18 Q. Would you identify him for the
 19 record?
 20 A. [REDACTED]

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in Palm Beach in the 1990s and 2000s?

A. I don't believe so.

Q. [REDACTED] for Mr. Epstein?

A. I believe late -- middle of 2000s. 2004, 2005, something like that.

Q. When he became [REDACTED], did he work for Mr. Epstein in Palm Beach?

A. I believe he did.

Q. And did you see [REDACTED] at Mr. Epstein's Palm Beach residence while [REDACTED]

A. I was not in Palm Beach when he was working for Mr. Epstein.

Q. I think you answered the question, but I want to be absolutely certain. Is it your testimony that you never saw [REDACTED] at Mr. Epstein's Palm Beach residence?

A. That is not my testimony.

Q. Did you ever see [REDACTED] at Mr. Epstein's Palm Beach residence?

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Q. Did you see [REDACTED] at Mr. Epstein's Palm Beach residence in 2005?

A. I don't recall going to the house in 2005, but if I was there and he was working, I would have seen him.

Q. Do you recall, as you sit here now, one way or another, whether you were at Mr. Epstein's Palm Beach residence in 2005?

A. I don't recall going to the house in 2005, but if I did go, I would have seen him. And if I did go, it would have been once, maybe, I maybe went to the house in 2005, I don't recall.

Q. If you went to the house in 2005, is it your testimony it would have only been once?

A. Sounds about right, maybe twice. I was not in Palm Beach in 2005.

Q. For you to have been at Mr. Epstein's house in Palm Beach, you would have had to have been in Palm Beach, right?

A. I would have had to have been in Palm Beach to be at his house in Palm Beach, of course.

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A. I'm sure I did because I would have seen him. I'm sure I did see him but -- yes, I would have seen him.

Q. When did you see [REDACTED] at Mr. Epstein's Palm Beach residence?

A. If I'm right and I could -- the dates are a bit off, Mr. Epstein's mother died, I think [REDACTED] was working for Mr. Epstein at that time, and I helped with the funeral arrangements and I would have seen him at that point.

Q. Other than the one occasion when Mr. Epstein's mother died, we can figure out what the date of that was --

A. I don't have all the dates in my head.

Q. Other than the one occasion when Mr. Epstein's mother died, did you ever see [REDACTED]

A. In that period of time when I went very infrequently to Palm Beach, I don't know how many times, maybe once or twice and had he been at the house, I would have seen him, so there would have been very few times.

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Q. So when you say you were not in Palm Beach in 2005, does that mean it is your testimony you were not at Mr. Epstein's house in Palm Beach in 2005?

A. I don't recall being at Mr. Epstein's house in 2005, I don't really recall being in Palm Beach in 2005, and if I was in Palm Beach in 2005, I may not have stayed at his house.

Q. Is it your testimony that the most you would have been at Mr. Epstein's house in Palm Beach in 2005 was once or twice, if that?

A. To the best of my recollection, that sounds about right. But I really don't recall, 2005 is a long time ago, I just don't recall.

Q. You were continuing to work for Mr. Epstein in 2005?

A. I was helping out in just very specific areas of staffing of the houses and some architectural details and decorating.

Q. You were getting paid?

MR. PAGLIUCA: We've gone over

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<p>1 G. Maxwell - Confidential</p> <p>2 this. You don't need to testify about</p> <p>3 this again. We will take it up with the</p> <p>4 judge, if we need to. I let this go on</p> <p>5 for 15 minutes about Palm Beach.</p> <p>6 MR. BOIES: I ask the question, you</p> <p>7 give the instruction, the judge decides.</p> <p>8 Q. In 2005, were you assisting in the</p> <p>9 arranging of massages for Mr. Epstein?</p> <p>10 A. No.</p> <p>11 Q. Not at all is your testimony?</p> <p>12 A. Correct.</p> <p>13 MR. BOIES: This is a good time to</p> <p>14 take a lunch break.</p> <p>15 MR. PAGLIUCA: Okay. I don't</p> <p>16 intend on being here all day, so if you</p> <p>17 have some important questions you want</p> <p>18 to ask, you may want to get to those.</p> <p>19 MR. BOIES: You can walk out any</p> <p>20 time you want.</p> <p>21 MR. PAGLIUCA: We are getting</p> <p>22 close.</p> <p>23 MR. BOIES: The judge will decide</p> <p>24 whether that's appropriate or not.</p> <p>25 MR. PAGLIUCA: We are getting</p>	<p>1 G. Maxwell - Confidential</p> <p>2 AFTERNOON SESSION</p> <p>3 (Time noted: 1:16 p.m.)</p> <p>4</p> <p>5 GHISLAINE MAXWELL,</p> <p>6 resumed and testified as follows:</p> <p>7</p> <p>8 THE VIDEOGRAPHER: The time is 1:16</p> <p>9 p.m., and we are back on the record.</p> <p>10 This also begins DVD No. 5.</p> <p>11 MR. PAGLIUCA: One housekeeping</p> <p>12 matter before you get started. The</p> <p>13 original deposition was as confidential</p> <p>14 and we would designate this continued</p> <p>15 deposition as confidential as well.</p> <p>16 MR. BOIES: Okay.</p> <p>17 Let me ask you to look at a</p> <p>18 document that has been marked as Maxwell</p> <p>19 Deposition Exhibit 28. This is another</p> <p>20 list of names.</p> <p>21 (Maxwell Exhibit 28, List of names,</p> <p>22 marked for identification, as of this</p> <p>23 date.)</p> <p>24 Q. What I would ask you to do is to</p> <p>25 identify the names that are here that you do</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 close.</p> <p>3 THE VIDEOGRAPHER: It's 12:15 p.m.</p> <p>4 and we are going off the record.</p> <p>5 (Whereupon, a luncheon recess was</p> <p>6 taken at 12:15 p.m.)</p> <p>7</p> <p>8 * * *</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 G. Maxwell - Confidential</p> <p>2 not recognize. That is, I think you will</p> <p>3 recognize most of the names --</p> <p>4 MR. POTTINGER: Excuse me one</p> <p>5 second.</p> <p>6 Q. What I was saying was that I would</p> <p>7 like you to look at the names here and tell</p> <p>8 me which names you do not recognize.</p> <p>9 A. I pretty much recognize these</p> <p>10 names. I don't know everybody very well, but</p> <p>11 I recognize the names.</p> <p>12 Q. You know who they are?</p> <p>13 A. I don't know if I know who they</p> <p>14 are. I recognize the names.</p> <p>15 Q. Are most of the people on this list</p> <p>16 people that you've met before?</p> <p>17 MR. PAGLIUCA: Objection to form</p> <p>18 and foundation.</p> <p>19 A. I believe I've met pretty much</p> <p>20 everybody on this list.</p> <p>21 Q. Who on the list have you not met?</p> <p>22 A. I think I met them all.</p> <p>23 Q. Now, were all of these people</p> <p>24 people that at one time or another you were</p> <p>25 with with Mr. Epstein?</p>

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

4 A. I believe so.

5 Q. Were any of these people on the
6 list, obviously leaving aside Mr. Epstein
7 himself, people who, to your knowledge,
8 received massages at one or more of Mr.
9 Epstein's properties?

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

12 A. I couldn't say.

13 Q. Are there any people on this list
14 who you have reason to believe received
15 massages at one or more of Mr. Epstein's
16 properties?

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

19 A. I couldn't say.

20 Q. Just to be clear, my most recent
21 question is whether any of the people on this
22 list are people who you have reason to
23 believe received massages at one of Mr.
24 Epstein's properties?

25 MR. PAGLIUCA: Same objection.

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2 A. I couldn't say.

3 Q. Why can't you say?

4 A. Because I just don't know.

5 Q. Well, you know whether you have a
6 reason to believe, correct?

7 MR. PAGLIUCA: Objection to form
8 and foundation.

9 A. These are events that took place 17
10 years ago, and I really do not know. It is
11 possible that people on that list got a
12 massage, it's also possible they didn't. I
13 really don't know, leaving aside, of course,
14 Mr. Epstein himself.

15 Q. Yes.

16 MR. PAGLIUCA: One second, I'm
17 getting text messages.

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 Q. Are there any names on this list
24 that you have reason to believe Mr. Epstein
25 engaged in sexual activities with?

MR. PAGLIUCA: Objection to form

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2 and foundation.

3 A. Eva Anderson was his girlfriend.

4 Q. I am sorry?

5 A. Eva Anderson was his girlfriend.

6 Q. When was Eva Anderson Mr. Epstein's
7 girlfriend?

8 A. I don't know the dates, but I
9 believe in the '80s.

10 Q. In the 1980s?

11 A. Yeah, and part of the 1990s, I
12 believe. So I don't know when they started
13 and when they ended. They were in a
14 long-term relationship.

15 Q. Was Mr. Epstein engaged in sexual
16 activities with Eva Anderson during the
17 period of time that you were involved with
18 Mr. Epstein?

19 A. I wouldn't know.

20 Q. How old was Eva Anderson when she
21 was first involved with Mr. Epstein?

22 A. I don't know.

23 Q. How old was Eva Anderson when you
24 first met her?

25 A. I don't recall.

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2 Q. Did any of the people on this list,
3 other than Mr. Epstein himself, and the list
4 is Exhibit 28, ever ask you to arrange a
5 massage?

6 MR. PAGLIUCA: Objection to form
7 and foundation.

8 A. Not that I recall.

9 Q. Did you arrange a massage for any
10 of the people on this list other than
11 Mr. Epstein?

12 A. Not that I recall.

13 Q. Were any of the people on this
14 list, other than Mr. Epstein, given a massage
15 at any of Mr. Epstein's residences?

16 MR. PAGLIUCA: Objection to form
17 and foundation. Asked and answered.

18 A. I wouldn't know.

19 Q. Did any of the people on this list,
20 other than Mr. Epstein, engage in sexual
21 activities with anyone at Mr. Epstein's
22 properties?

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

25 A. I wouldn't know.

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2 Q. When you say I wouldn't know, I
3 take it you mean to include that you
4 testified that you do not know, is that
5 correct?

6 MR. PAGLIUCA: Objection to form
7 and foundation.

8 A. I would have no knowledge. I have
9 no knowledge of what you are asking me.

10 Q. Did you ever have conversations
11 with anyone that were intended to convince
12 them to engage in sexual activities with
13 Mr. Epstein?

14 MR. PAGLIUCA: Objection to form
15 and foundation. This has been asked and
16 answered in her previous deposition, by
17 the way.

18 A. No.

19 Q. Did you ever tell anyone that
20 Mr. Epstein was a scout for Victoria's
21 Secret?

22 A. I don't recall saying that.

23 Q. Did you ever tell anyone that
24 Mr. Epstein could get them a job with
25 Victoria's Secret?

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2 A. I don't recall saying that.

3 Q. Do you deny saying that, or do you
4 simply say you don't recall, one way or
5 another, whether you said it?

6 MR. PAGLIUCA: This is outside the
7 court's order, so I will tell you not to
8 answer this, and we will take it up with
9 the judge.

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2

15 Q. Was there anything that occurred
16 that led you to conclude that you didn't want
17 to be there anymore?

18 A. I ceased to be happy in the job and
19 I ceased to be happy spending time with
20 Mr. Epstein.

21 Q. Was there anything that happened
22 that you can identify that caused you to
23 cease to be happy spending time with
24 Mr. Epstein?

25 A. He became more difficult to work

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2 with.

3 Q. Was there any particular aspect of
4 that that you can identify now?

5 A. Just general. Just doesn't work.

6 Q. Let me focus on [REDACTED]. Now,
7 you testified that you have no reason to
8 believe that [REDACTED] engaged in sexual
9 activities with anyone at any of Mr.
10 Epstein's residences, is that correct?

11 A. I would have no knowledge of that.

12 Q. Did you ever see [REDACTED] engage
13 in sexual activities with anyone?

14 A. I did not.

15 Q. Did you ever see [REDACTED] taking
16 photographs of people engaged in sexual
17 activities?

18 A. I did not.

19 Q. I apologize for getting into
20 something that is kind of an intimate area,
21 but I need to establish this, in part because
22 it relates to patterns of conduct, and I need
23 to ask you some questions about your sexual
24 activities with Mr. Epstein.

25 A. Okay.

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2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 Q. Did you ever have conversations
8 with anyone who was engaged in sexual
9 activities with Mr. Epstein about those
10 sexual activities?

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

13 A. I never had those conversations.

14 Q. So would it be your testimony that
15 you never had any conversations about Mr.
16 Epstein's sexual activities with [REDACTED]
17 [REDACTED]

18 A. I have never talked about sex with
19 [REDACTED] at any point. I have hardly ever
20 spoken to her.

21 Q. Would your testimony be the same
22 with respect to [REDACTED]

23 A. That would be true, correct, I have
24 not.

25 Q. And Virginia Roberts?

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2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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2 A. Of course not.

3 Q. Were there any young men that, to
4 your knowledge, would bring women over to
5 Mr. Epstein's residences to perform services
6 for Mr. Epstein?

7 MR. PAGLIUCA: Objection to form
8 and foundation.

9 A. Can you repeat the question,
10 please?

11 Q. Were there any young men that, to
12 your knowledge, would bring women over to
13 Mr. Epstein's residences to perform services
14 for Mr. Epstein?

15 A. I have no idea what you are talking
16 about, I'm sorry.

17 Q. I'm talking about whether there
18 were any young men that brought women over to
19 Mr. Epstein's residence to perform services?

20 A. I can't think of a single man in
21 that context that I've ever met.

22 Q. You testified earlier that you did
23 not recall ever meeting [REDACTED], is
24 that correct?

25 A. I don't believe I ever have.

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2 Q. Insofar as you were aware, did
3 Virginia Roberts ever have a male friend that
4 visited her at the Epstein residences?

5 A. I don't recall ever seeing a man
6 with Virginia. I believe she had a fiance
7 that I was aware of, I think, but that's all.

8 Q. When were you aware that Virginia
9 Roberts had a fiance?

10 A. I can't say I became aware from
11 reading all this stuff, or I was aware of it
12 at the time. I don't know.

13 Q. Did you ever meet Virginia Roberts'
14 fiance?

15 A. I don't think I ever did. I don't
16 recall meeting any men with Virginia.

17 Q. Do you know [REDACTED],
18 [REDACTED]

19 A. I never heard that name before.

20 Q. Have you ever heard the name of
21 [REDACTED]

22 A. I don't recollect that name at all.

23 MR. PAGLIUCA: Mr. Boies, those
24 names are on Exhibit 26, which we have
25 already gone over and she said she

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2 what has been going on, and I
3 attribute -- maybe I shouldn't attribute
4 it at all.

5 But if you want to instruct not to
6 answer, instruct not to answer. If you
7 don't, again, all I will do is request
8 that you cease your comments. I can't
9 do that. All I can do is seek sanctions
10 afterwards.

11 BY MR. BOIES:

12 Q. Ms. Maxwell.

13 A. Mr. Boies.

14 Q. What?

15 A. I'm replying. You said Ms.
16 Maxwell, I said Mr. Boies.

17 Q. Do you have a question?

18 A. No.

19 Q. I have a question.

20 A. I'm sure you do.

21 Q. During the time that you were in
22 the property or at the property that
23 Mr. Epstein has in the Virgin Islands, were
24 you aware of Mr. Epstein getting any
25 massages?

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2 didn't recognize those people, so now we
3 are just repeating things that we went
4 over.

5 MR. BOIES: I am in the context of
6 seeing if I can refresh her
7 recollection, because these are women
8 that [REDACTED], who she also does not
9 recall, brought over to Mr. Epstein's
10 residences, and I also want to make a
11 very clear record of what her testimony
12 is and is not right now.

13 Again, you can instruct her not to
14 answer if you wish.

15 MR. PAGLIUCA: I'm trying to get to
16 nonrepetitive questions here. You
17 basically asked the same question three
18 times. Then we get a pile of notes that
19 get pushed up to you, you read those.
20 Then you ask those three times, and then
21 we go to another question. So it's
22 taking an inordinately long amount of
23 time and it shouldn't.

24 MR. BOIES: I think that is a
25 demonstrably inaccurate statement of

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2 A. He did receive massages at the
3 Virgin Islands property.

4 Q. From whom did he receive massages
5 at the Virgin Islands?

6 A. There is a professional masseuse
7 and masseur that came from St. Thomas.

8 Q. This was somebody who came over
9 from St. Thomas for the day to give massages
10 and then left, or was that person a resident?

11 A. I believe, from memory, they came
12 over, gave a massage and left.

13 Q. And who arranged for this person to
14 come over from St. Thomas?

15 A. Probably the staff at the island.

16 Q. But you don't know?

17 A. The staff of the island would have
18 made those arrangements.

19 Q. Who at the staff?

20 A. Whoever would have been running the
21 island at that period of time.

22 Q. Do you know who that was?

23 A. I'm sorry, in this moment I can't
24 think of the names of the people who worked
25 on the island.

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<p>1 G. Maxwell - Confidential</p> <p>2 Q. Did you ever arrange for anyone to</p> <p>3 give Mr. Epstein a massage at his Virgin</p> <p>4 Island property?</p> <p>5 A. I don't recall if I ever made a</p> <p>6 call to the massage people in St. Thomas. I</p> <p>7 don't recall.</p> <p>8 Q. Did Mr. Epstein ever receive</p> <p>9 massages at his Virgin Island property from</p> <p>10 people that he had brought with him on his</p> <p>11 plane from the United States?</p> <p>12 MR. PAGLIUCA: Objection to form</p> <p>13 and foundation.</p> <p>14 A. I don't know.</p> <p>15 Q. Did you ever participate in</p> <p>16 arranging for a massage for Mr. Epstein by</p> <p>17 someone who had been brought to the island on</p> <p>18 Mr. Epstein's plane?</p> <p>19 A. My memory of the massages on the</p> <p>20 island were from people who came from St.</p> <p>21 Thomas.</p> <p>22 Q. Does that mean that you never</p> <p>23 participated in arranging for a massage for</p> <p>24 Mr. Epstein at his Virgin Island property to</p> <p>25 be given by someone who had been brought to</p>	<p>1 G. Maxwell - Confidential</p> <p>2 A. It was a cabana, and also he had a</p> <p>3 beach place, a place on the beach where from</p> <p>4 time to time he would...</p> <p>5 Q. Did you ever see Mr. Epstein being</p> <p>6 given a massage in the beach area where he</p> <p>7 from time to time had massages?</p> <p>8 A. I don't have any recollection of a</p> <p>9 specific memory, but it was just on the</p> <p>10 beach, so there wouldn't be any privacy, he</p> <p>11 would just be getting a massage.</p> <p>12 Q. That would be visible to people who</p> <p>13 are on the beach, correct?</p> <p>14 A. It would be, yes.</p> <p>15 Q. Did you, at any time when you were</p> <p>16 there, see Mr. Epstein being given a massage</p> <p>17 in this beach area other than by a</p> <p>18 professional masseuse brought to the island</p> <p>19 from St. Thomas?</p> <p>20 A. I don't have any memory of -- I</p> <p>21 don't have a specific memory of seeing him</p> <p>22 get a massage on the beach. I just have an</p> <p>23 image of a massage on the beach, so I don't</p> <p>24 know who, I have no memory of it.</p> <p>25 Q. Whether or not you have a specific</p>
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<p>1 G. Maxwell - Confidential</p> <p>2 the island on Mr. Epstein's plane?</p> <p>3 MR. PAGLIUCA: Objection to form</p> <p>4 and foundation.</p> <p>5 A. I don't recall, I have no idea.</p> <p>6 Q. Mr. Epstein did bring women to his</p> <p>7 Virgin Island property on his plane from time</p> <p>8 to time, right?</p> <p>9 MR. PAGLIUCA: Objection to form</p> <p>10 and foundation.</p> <p>11 A. People came to the island who were</p> <p>12 his guests.</p> <p>13 Q. And some of those guests, as you</p> <p>14 described it, were women, right?</p> <p>15 A. Indeed.</p> <p>16 Q. Did you ever participate in</p> <p>17 arranging for any of the women that came to</p> <p>18 Mr. Epstein's Virgin Island property to</p> <p>19 provide Mr. Epstein with a massage?</p> <p>20 A. No.</p> <p>21 Q. Where on the Virgin Island property</p> <p>22 did Mr. Epstein have his massages?</p> <p>23 A. I believe from memory he had them</p> <p>24 in the master cabana.</p> <p>25 Q. In what?</p>	<p>1 G. Maxwell - Confidential</p> <p>2 memory of it, do you have a general memory</p> <p>3 that from time to time Mr. Epstein got</p> <p>4 massages down in the beach area?</p> <p>5 A. I have a general memory, I do.</p> <p>6 Q. Do you have a general memory that</p> <p>7 from time to time those massages were given</p> <p>8 to Mr. Epstein by people other than a</p> <p>9 professional masseuse brought to the island</p> <p>10 from St. Thomas?</p> <p>11 MR. PAGLIUCA: Objection to form</p> <p>12 and foundation.</p> <p>13 A. I have no idea who would be giving</p> <p>14 him a massage in that general memory of mine,</p> <p>15 so I can't say. The massages that I recall</p> <p>16 were from people from St. Thomas, and that's</p> <p>17 what I recall.</p> <p>18 Q. Did anyone ever complain to you</p> <p>19 that Mr. Epstein had demanded sex of them?</p> <p>20 MR. PAGLIUCA: Objection to form</p> <p>21 and foundation.</p> <p>22 A. Is that a question?</p> <p>23 Q. Yes.</p> <p>24 A. Never.</p> <p>25 Q. Do you know somebody named Reynaldo</p>

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 2 Rizzo?
 3 A. I do not.
 4 Q. Who is he?
 5 A. I don't know him -- I know who he
 6 is now, but he worked, I believe, for Eva and
 7 Glenn, but prior to --
 8 Q. Eva and Glenn Dubin?
 9 A. Yeah.
 10 Q. It's your testimony you never met
 11 Mr. Rizzo?
 12 A. I don't recall ever meeting him.
 13 Q. Do you remember being at the
 14 Dubins' residence with Mr. Rizzo and with a
 15 [REDACTED]
 16 A. I do not.
 17 Q. Do you ever remember a [REDACTED]
 18 [REDACTED] during
 19 the period of time that you were with
 20 Mr. Epstein?
 21 A. I do not.
 22 Q. Was there ever a time when you were
 23 at the Dubin residence with a girl under the
 24 age of 21 who had been with Mr. Epstein?
 25 MR. PAGLIUCA: Objection to form

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1 G. Maxwell - Confidential
 2 and foundation.
 3 A. Can you repeat the question,
 4 please?
 5 Q. Sure.
 6 You remember from time to time
 7 being at the Dubin residence, correct?
 8 A. I do.
 9 Q. And I think you testified that you
 10 don't remember whether Mr. Rizzo was present
 11 on any of those occasions, although he might
 12 have been, correct?
 13 A. If Mr. Rizzo was standing right
 14 here in front of me, I wouldn't know who he
 15 is.
 16 Q. Does that mean you are saying that
 17 you never met him or simply that you don't
 18 remember him?
 19 A. I don't know if I ever met him, but
 20 if I saw him in a picture, maybe I would
 21 recognize it, but I don't believe I'd
 22 remember him.
 23 Q. Did you ever go to the Dubin
 24 residence with some woman who had previously
 25 been with Mr. Epstein?

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1 G. Maxwell - Confidential
 2 MR. PAGLIUCA: Objection to form
 3 and foundation.
 4 A. No, no.
 5 Q. Let me see if I can possibly
 6 refresh your recollection. Do you recall
 7 being at the Dubin residence with a young
 8 Swedish girl that was crying and very
 9 distraught?
 10 A. I have never seen that.
 11 Q. Did you ever take the passport of
 12 any person who had told you that Mr. Epstein
 13 had demanded sex of them?
 14 A. No.
 15 Q. Were you ever at any residence of
 16 Mr. Epstein's when Alan Dershowitz was
 17 present?
 18 A. I'm sure I was.
 19 Q. Were you at Mr. Epstein's Palm
 20 Beach residence when Mr. Dershowitz was
 21 present?
 22 A. I may have been. It's possible.
 23 Q. Were you at Mr. Epstein's New
 24 Mexico property when Mr. Dershowitz was
 25 present?

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 2 A. I don't have any memory of that,
 3 but it's possible. I just don't recall it.
 4 Q. Were you at Mr. Epstein's Virgin
 5 Islands property when Mr. Dershowitz was
 6 present?
 7 A. That I do recall, yes.
 8 Q. Were you at Mr. Epstein's New York
 9 property when Mr. Dershowitz was present?
 10 A. Again, it's possible, but I don't
 11 have a memory of it.
 12 Q. How many times do you recall being
 13 at Mr. Epstein's Virgin Island property when
 14 Mr. Dershowitz was also present?
 15 A. I only recall once.
 16 Q. When was that?
 17 A. I don't recall the date.
 18 Q. Who else was present on that time?
 19 A. I believe his wife and his
 20 daughter.
 21 Q. Anyone else?
 22 A. I don't recall anyone else.
 23 Q. Anyone else on the whole island. I
 24 don't just mean with him. I mean did
 25 Mr. Epstein have other guests with him at

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1 G. Maxwell - Confidential
 2 that time?
 3 A. I don't recall anybody else.
 4 Q. How did you arrive there?
 5 A. I don't know.
 6 Q. Did you come with Mr. Epstein?
 7 A. I don't know, I'm sorry.
 8 Q. How did Mr. Dershowitz arrive
 9 there?
 10 A. Again, I don't know.
 11 Q. Did he come with Mr. Epstein?
 12 A. I don't know.
 13 Q. Other than that one time that you
 14 say you were at the Virgin Island property
 15 with Mr. Dershowitz, had you ever met
 16 Mr. Dershowitz in Mr. Epstein's presence?
 17 MR. PAGLIUCA: This is outside of
 18 the court's order. I will tell you not
 19 to answer that question.
 20 THE WITNESS: Okay.
 21 Q. Did Mr. Dershowitz ever receive a
 22 massage at any of Mr. Epstein's properties?
 23 A. I don't recall.
 24 Q. Did you ever have any conversations
 25 with Mr. Dershowitz?

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1 G. Maxwell - Confidential
 2 MR. PAGLIUCA: You don't have to
 3 answer that question. About what,
 4 anything?
 5 Q. Did you ever have any conversations
 6 with Mr. Dershowitz at Mr. Epstein's
 7 properties?
 8 A. I did, about metal detecting.
 9 Q. Anything else?
 10 A. I only recall metal detecting.
 11 Q. Where did that conversation take
 12 place?
 13 A. As I was metal detecting.
 14 Q. I said where?
 15 A. On the island.
 16 Q. That's the only conversation that
 17 you recall, is that your testimony?
 18 A. Yes, that is my testimony.
 19 Q. Do you recall ever seeing
 20 Mr. Dershowitz at any of Mr. Epstein's
 21 residences other than the Virgin Island
 22 property?
 23 A. That's the only specific memory I
 24 have of the conversation that I recall
 25 because it was something special.

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 2 Q. I'm not now asking you about a
 3 conversation.
 4 A. What are you asking me? Sorry.
 5 Q. Do you recall ever seeing
 6 Mr. Dershowitz at any of Mr. Epstein's
 7 residences other than the Virgin Island
 8 property?
 9 A. I don't have any specific
 10 recollection.
 11 Q. Do you have a general recollection?
 12 A. I have a general recollection that
 13 I have seen him, but I just don't have any
 14 other memory of it. I know I met him. I
 15 just don't recall where or when, except for
 16 that singular event on the island.
 17 Q. When you say you have a general
 18 recollection that you have seen him, do you
 19 mean you have a general recollection that you
 20 have seen him at Mr. Epstein's properties
 21 other than the Virgin Islands?
 22 A. It's just a general recollection,
 23 but I have no specific memory of seeing him.
 24 Q. All I'm trying to do is find out
 25 whether your general recollection is a

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 2 general recollection of having seen him
 3 someplace in the world or whether you have a
 4 general recollection of having seen him at
 5 Mr. Epstein's properties?
 6 A. I'm sorry, I really can't answer.
 7 I just don't know. The only memory I have of
 8 him is on the island, and I don't have any
 9 additional memory of him anywhere else.
 10 Q. I mentioned a woman by the name of
 11 [REDACTED] before. Are you familiar with a
 12 [REDACTED] And I don't mean to imply
 13 they are the same people.
 14 A. Is this on any of these lists that
 15 you gave me?
 16 Q. It could have been on the first
 17 list. I don't think so.
 18 A. Is it on this list?
 19 Q. It's not on the second list.
 20 A. So what's your question?
 21 Q. Are you familiar with a woman named
 22 [REDACTED]
 23 A. I'm familiar with the name, yes.
 24 Q. Who is that person?
 25 A. I don't recall who she is.

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1 G. Maxwell - Confidential
2 Q. What is [REDACTED] connection
3 to Mr. Epstein?

4 A. I don't know.

5 Q. Did you ever speak to [REDACTED]
6 [REDACTED]

7 A. I don't recall. I know her name,
8 and that's all I can -- I don't recall a
9 conversation with her. I don't recall who
10 she is at this point.

11 Q. Was [REDACTED] someone who
12 provided massages for Mr. Epstein?

13 A. I don't believe so.

14 Q. Did [REDACTED] perform any
15 services for Mr. Epstein?

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

18 A. I have no idea, I'm sorry.

19 Q. When did you first become aware of
20 charges that Mr. Epstein was having sex with
21 a significant number of people at his
22 residences?

23 MR. PAGLIUCA: You don't have to
24 answer that question. It's outside of
25 the court's order.

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2 Q. You have testified that you were
3 only aware of a few people that Mr. Epstein
4 had sex with or engaged in sexual activities
5 with at his residences, correct?

6 MR. PAGLIUCA: Objection to form
7 and foundation.

8 A. I didn't say that.

9 Q. How many people are you aware of
10 that Mr. Epstein engaged in sexual activities
11 with at his residences?

12 A. I'm not aware.

13 Q. You are aware of some?

14 A. Well, the ones that we've
15 discussed, but that's all I'm aware of.

16 Q. That's my question.

17 A. Then I can concur, yes.

18 Q. Let's be clear. You have
19 identified three people.
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]

8 A. Are you giving me a timeframe here,
9 because it's been a long time. I'm assuming
10 he is having sexual relations today. You
11 have to bind it to some time.

12 Q. You don't know who he is having
13 sexual relationships with today, do you?

14 A. No.

15 Q. So you can only tell me who
16 Mr. Epstein was having sexual relationships
17 with at a time when you knew about it,
18 correct?

19 A. I have no knowledge of him actually
20 having sex with anybody else outside of what
21 we have identified, [REDACTED]
22 [REDACTED].

23 Q. Now, there came a time when you
24 learned that people were asserting that he
25 had had sexual activities with a lot more

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1 G. Maxwell - Confidential
2 than those three people at his residences,
3 correct? During the period of time that you
4 were involved with Mr. Epstein, correct?

5 A. Like everybody else, like the rest
6 of the world, when it was announced in the
7 papers.

8 Q. Yes.

9 And that was during 2005?

10 A. Whenever it was.

11 Q. At that point, did you do anything
12 to try to find out whether those assertions
13 were or were not accurate?

14 MR. PAGLIUCA: You don't have to
15 answer that. That's outside the court's
16 order.

17 Q. When you heard that there were
18 assertions that Mr. Epstein had engaged in
19 sexual activities with people who you had met
20 at Mr. Epstein's residences, did you do
21 anything to determine whether those
22 assertions were or were not accurate?

23 MR. PAGLIUCA: Objection to form
24 and foundation, and you don't have to
25 answer that question. It's outside the

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2 court's order.

3 Q. In terms of preparing for this
4 deposition, what documents did you review?

5 MR. PAGLIUCA: To the extent I
6 provided you with any documents to
7 review, I will tell you that's both --
8 it's privileged and I instruct you not
9 to answer.

10 Q. Did your lawyer provide you with
11 any documents to review in preparation for
12 this deposition that refreshed your
13 recollection about any of the events that
14 occurred?

15 MR. PAGLIUCA: You can answer that
16 question.

17 A. No.

18 Q. How many documents did your lawyer
19 provide you with?

20 MR. PAGLIUCA: You can answer.

21 A. One, I believe.

22 Q. One document. Was that a document
23 that had been prepared by your attorney, or
24 was it a document from the past?

25 MR. PAGLIUCA: I will tell you not

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2 sexual activities with [REDACTED]

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

5 A. I didn't have any reason -- I had
6 no idea whether they were or weren't.

7 Q. Were you with Mr. Epstein in 2005
8 when the Palm Beach police launched their
9 investigation?

10 MR. PAGLIUCA: You don't have to
11 answer the question. That's outside the
12 court's order.

13 Q. When the Palm Beach police launched
14 their investigation in 2005, did you make any
15 effort to retain records of the women who had
16 been present at Mr. Epstein's residences in
17 the prior period?

18 MR. PAGLIUCA: Don't answer that
19 question. It's outside the court's
20 order.

21 Q. When the Palm Beach police launched
22 their investigation in 2005, were you aware
23 of any effort to destroy records of women who
24 had been present at Mr. Epstein's residences
25 in the prior period?

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2 to answer that question.

3 Q. Was the document that your attorney
4 showed you a document that you had ever seen
5 before?

6 MR. PAGLIUCA: Again, don't answer
7 questions about what I showed you or
8 didn't show you.

9 She already testified that nothing
10 refreshed her recollection.

11 MR. BOIES: I don't have to accept
12 that answer. I can ask these questions,
13 and I think these are clearly not
14 privileged questions.

15 Q. Do you know a [REDACTED]

16 A. I do.

17 Q. Who is [REDACTED]

18 A. She was a friend of Jeffrey's.

19 Q. Was [REDACTED] someone with whom
20 Mr. Epstein engaged in sexual activities?

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

23 A. I don't know.

24 Q. Did you ever have any reason to
25 believe that Mr. Epstein was engaged in

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2 MR. PAGLIUCA: Don't answer that
3 question. It's outside the court's
4 order.

5 Q. In 2005, were you aware of any
6 effort to destroy records of messages you had
7 taken of women who had called Mr. Epstein in
8 the prior period?

9 MR. PAGLIUCA: Don't answer that
10 question. It's outside the court's
11 order.

12 MR. BOIES: I said I would give you
13 a break every hour. It's been an hour.

14 MR. PAGLIUCA: Do you want a break
15 or do you want to keep going?

16 THE WITNESS: Keep going.

17 MR. BOIES: What I told you before,
18 you asked for a break every hour. I am
19 happy to give you a break at a fixed
20 time. What I'm not happy to do is
21 interrupt a chain of examination.

22 So if you want a break now, we will
23 take a break now. If you don't want a
24 break now, we will not break for another
25 hour.

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2 MR. PAGLIUCA: Is there a rule that
3 you can point me to that mandates that
4 you get to control the time and place of
5 breaks?

6 MR. BOIES: No. We will take a
7 break now, because if what you are going
8 to do is say, you said at the very
9 beginning of this thing that you wanted
10 to have a rule that every hour we took a
11 break, and I said that was fine with me,
12 but I just didn't want you taking a
13 break, particularly since you reserve
14 the right to talk to your client during
15 breaks, in the middle of an examination.

16 Now you are saying let's continue
17 for a while but I am not agreeing to
18 continue for the next hour. We will
19 take a break, and we will come back and
20 we will go from there.

21 MR. PAGLIUCA: We will take a break
22 at your request now, and then if I want
23 to take a break, we will take another
24 break.

25 MR. BOIES: If you take a break to

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2 talk to your witness, I guarantee you
3 there will be a motion for sanctions. I
4 think what you're doing with this
5 witness is inappropriate. I think your
6 instructions not to answer,
7 conversations that you had with her
8 while she is under oath and under
9 examination is inappropriate.

10 THE VIDEOGRAPHER: It's 2:18 p.m.,
11 and we are off the record.

12 (Recess.)

13 THE VIDEOGRAPHER: The time is 2:28
14 p.m. This also begins DVD No. 6.

15 BY MR. BOIES:

16 Q. Let me hand you a document that has
17 been previously marked as Maxwell Exhibit 13.
18 And I would like you to turn to page 91 of
19 that exhibit. And you see the heading that
20 says, "Massage-Florida"?

21 A. Actually, I don't -- yes, I do,
22 sorry.

23 Q. Then you see a list of telephone
24 numbers with names?

25 A. I do.

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2 Q. I would like to go down those names
3 and see if any of those people are people
4 that you recognize. However you think is
5 best, we can go name by name, or you can tell
6 me which ones you recognize and which ones
7 you don't.

8 A. I recognize [REDACTED]. I recognize
9 [REDACTED]. These are
10 names that ring bells, nothing else.

11 [REDACTED] I recognize the name.

12 Q. Where is [REDACTED]

13 A. [REDACTED]. I just recognize
14 these names. It doesn't mean anything else.
15 I'm just recognizing names.

16 [REDACTED].
17 Let me do it again and make sure I
18 didn't miss anyone. That's it.

19 Q. Now, with respect to the people
20 that you say you recognized the names of,

21 [REDACTED], were
22 any of those people, people who provided
23 massages to Mr. Epstein?

24 MR. PAGLIUCA: Objection to form
25

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2 and foundation.

3 A. Sorry, I guess. I believe [REDACTED]
4 did, and I believe -- I think that's it that
5 I know of, I think.

6 Q. Now, just going down the names of
7 people that you did not recognize, I take it
8 you are not aware or recognize the name [REDACTED]
9 first name?

10 A. It was just a first name. I can't
11 think of a [REDACTED] at this point.

12 Q. The same thing is true for [REDACTED]

13 A. I don't recognize [REDACTED].

14 Q. And [REDACTED]

15 A. I don't recognize [REDACTED]

16 Q. And [REDACTED]

17 A. Is that [REDACTED] Where is that?
18 That's [REDACTED], I'm sorry, I missed her.

19 That would probably be [REDACTED].
20 I think [REDACTED] might have been a

21 masseuse as well. There is a [REDACTED] in the
22 back of my head.

23 Q. [REDACTED]

24 A. I don't know who that is.

25 Q. What about [REDACTED]

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1 G. Maxwell - Confidential
 2 A. No.
 3 Q. What about [REDACTED]
 4 A. No.
 5 Q. [REDACTED]
 6 A. No.
 7 Q. [REDACTED]
 8 A. I didn't think I know a [REDACTED]
 9 period.
 10 Q. [REDACTED]
 11 A. No.
 12 Q. Is that Virginie?
 13 A. I don't know what that is.
 14 Q. Then there is a [REDACTED] or [REDACTED]
 15 Do you see that?
 16 A. I don't see that.
 17 Q. It's right after Virginia, which is
 18 right after [REDACTED]
 19 A. I see it. I don't know who that
 20 is.
 21 Q. How about [REDACTED]
 22 A. No idea.
 23 Q. There is someone here [REDACTED], and
 24 described as a redhead?
 25 A. I don't know who that is.

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1 G. Maxwell - Confidential
 2 Q. [REDACTED]
 3 A. No.
 4 Q. And there is a [REDACTED]
 5 A. I don't know.
 6 Q. [REDACTED]
 7 A. No idea.
 8 Q. Then there is [REDACTED]
 9 A. That's a name that keeps coming up.
 10 I recognize the name, but I don't know her in
 11 particular.
 12 Q. What about [REDACTED]
 13 A. I have no idea who that is.
 14 Q. [REDACTED]
 15 A. No idea.
 16 Q. Somebody that's listed as
 17 [REDACTED], Virginia's friend?
 18 A. No.
 19 Q. [REDACTED], do you know who that
 20 is?
 21 A. No.
 22 Q. How about [REDACTED] friend?
 23 A. No.
 24 Q. Do you know who [REDACTED] is?
 25 A. No.

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 2 Q. Next one is [REDACTED] --
 3 A. [REDACTED] is Virginia's guy that you
 4 asked me about. I don't know [REDACTED].
 5 Q. I asked you about a [REDACTED].
 6 A. Right, I don't know him, so I'm
 7 guessing, I don't know him.
 8 Q. [REDACTED]
 9 A. No.
 10 Q. [REDACTED]
 11 A. No.
 12 Q. [REDACTED]
 13 A. I don't know who these people are.
 14 Q. Was there a list that was kept of
 15 women or girls who provided massages?
 16 MR. PAGLIUCA: This has been
 17 previously deposed on. This is not part
 18 of the court's order, I will tell her
 19 not to answer.
 20 MR. BOIES: You are going to tell
 21 her not to answer a question that says
 22 was there a list of women or girls who
 23 provided massages?
 24 MR. PAGLIUCA: She has been
 25 previously deposed on this subject.

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 2 MR. BOIES: I think this is
 3 squarely in the court's order, but if
 4 you instruct her not to answer, you
 5 instruct her not to answer.
 6 MR. PAGLIUCA: We'll find out.
 7 BY MR. BOIES:
 8 Q. I take it you don't know the ages
 9 of any of these people?
 10 A. The ones that I did recognize were
 11 roughly my age. The ones I don't know, I
 12 wouldn't have a clue.
 13 Q. Did you, or insofar as you are
 14 aware anyone, maintain a list of females that
 15 provided massage services to Mr. Epstein at
 16 his residences?
 17 MR. PAGLIUCA: Objection to form
 18 and foundation.
 19 You can answer if you can.
 20 A. I don't know anything about a list.
 21 Q. Let me go back to Exhibit 28. I
 22 want to go down this list, excluding
 23 Mr. Epstein himself, and just ask you a
 24 series of the same essential questions about
 25 each one.

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 2 [REDACTED], which of Mr. Epstein's
 3 residences did you see [REDACTED] at?
 4 A. I don't have a memory of [REDACTED]
 5 where I would have seen her.
 6 Q. Did you see her at some residence
 7 or property?
 8 A. I did.
 9 Q. Of Mr. Epstein?
 10 A. I did.
 11 Q. You just can't remember which ones,
 12 is that fair?
 13 A. Yes, that's fair.
 14 Q. [REDACTED], which residences of
 15 Mr. Epstein did you see [REDACTED] at?
 16 A. I don't actually recall meeting
 17 [REDACTED], so I can't recall.
 18 Q. So [REDACTED] may be somebody
 19 who you never met, is that your testimony?
 20 A. No, I'm not saying that. I just
 21 don't recall her really at all. I'm sorry, I
 22 don't recall.
 23 Q. Did you see [REDACTED] at some
 24 residence or property of Mr. Epstein?
 25 A. I don't recall.

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 2 Q. [REDACTED], what properties of
 3 Mr. Epstein did you see [REDACTED] at?
 4 A. Palm Beach, and I believe New
 5 Mexico and New York.
 6 Q. And [REDACTED]
 7 A. Palm Beach, I believe.
 8 Q. And what was [REDACTED] doing at
 9 Palm Beach when you saw her?
 10 A. If I remember correctly, she was a
 11 real estate broker.
 12 Q. Did you see [REDACTED] at
 13 Mr. Epstein's Virgin Island property?
 14 A. I don't recall.
 15 Q. When you saw [REDACTED] in Palm
 16 Beach and New Mexico and New York, what was
 17 she doing?
 18 A. I don't know.
 19 Q. Do you know why she was there?
 20 A. I think she was just a friend.
 21 Q. A friend of Mr. Epstein's?
 22 A. Yeah.
 23 Q. [REDACTED], what Epstein
 24 properties did you see her at?
 25 MR. PAGLIUCA: I will now tell you

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 2 not to answer these questions anymore.
 3 These do not appear -- I let this go on,
 4 they don't appear to be tied to the
 5 court's order as relating to sex or
 6 massages or anything that's contained in
 7 the order. This is just simply what was
 8 somebody doing at some property at some
 9 point in time. So don't answer these
 10 questions.
 11 Q. It is your assertion that, leaving
 12 Mr. Epstein aside, none of the people on this
 13 list engaged in sexual activities with either
 14 you or Mr. Epstein, correct?
 15 MR. PAGLIUCA: Objection to form
 16 and foundation.
 17 A. I can only testify to myself. I
 18 cannot testify to Mr. Epstein.
 19 Q. With respect to Mr. Epstein, do you
 20 know, one way or another, whether any of
 21 these people engaged in sexual activities?
 22 A. With respect to Mr. Epstein, how
 23 would I know that?
 24 Q. The answer is lots of ways, but all
 25 I can do is ask you whether you know it or

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 2 not.
 3 A. I don't.
 4 Q. Do you have any reason to believe
 5 -- because I don't want to get stuck on your
 6 concept of personal knowledge -- do you have
 7 any reason to believe that any of the people
 8 on this list had sexual activities with
 9 Mr. Epstein?
 10 A. I do not.
 11 Q. Do you have any reason to believe
 12 that any of these people had massages at any
 13 Epstein property?
 14 A. I have no idea. It's entirely
 15 possible, but I have no idea.
 16 Q. Do you have any reason to believe
 17 that any of the people on this list, other
 18 than Mr. Epstein himself, engaged in sexual
 19 activities with anyone on Mr. Epstein's
 20 properties?
 21 A. I have no reason to believe that.
 22 Q. Let me go to the Dubin residence.
 23 I asked you some questions about the Dubin
 24 residence earlier and about a possible visit
 25 to that residence of a [REDACTED]. Do you

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recall that subject generally?

A. I recall you asking me a question about it, yes, I do.

Q. Let me ask about another time at the Dubin residence. Were you ever at the Dubin residence with people who worked at the Epstein residence?

MR. PAGLIUCA: Objection to form and foundation.

A. No.

Q. Were you ever at the Dubin residence when there were a number of females under the age of 21 dancing?

A. Excuse me?

Q. Were you ever at the Dubin residence when there were a number of females under the age of 21 dancing?

A. The only people I have seen dancing at any Dubin residence are [REDACTED]

Q. Just those [REDACTED], no other [REDACTED]?

A. No other [REDACTED]

Q. Were you ever at the Dubin residence when females who you had seen at

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MR. PAGLIUCA: I want to make a record here before we are done. I do get a chance to speak. Are we going off the record now?

MR. BOIES: You want to talk on the record?

MR. PAGLIUCA: Yes, is that okay with you?

MR. BOIES: You want to ask her questions?

MR. PAGLIUCA: No. I want to make a record of your closing of the deposition.

MR. BOIES: I don't know how you can make a record of my closing the deposition, but if you want to take up the time and the transcript space to talk as opposed to writing a letter or filing a motion, go for it.

MR. PAGLIUCA: To the extent you have questions that are within the court's order that you haven't asked, that I haven't objected to, meaning no other questions, this deposition is

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the residences of Mr. Epstein, leaving aside [REDACTED] were present and dancing?

A. Can you ask me the question again?

Q. Sure. I'm focusing on the Dubin residence, and I'm focusing on children other than [REDACTED]

A. I'm there.

Q. I'm asking whether you were ever at the Dubin residence where there were females other than [REDACTED] who were dancing.

A. I've never witnessed --

MR. PAGLIUCA: Objection to form and foundation.

A. Other than [REDACTED], who I have certainly seen dancing, I don't recall any dancing at Eva and Glenn's residences by any other people.

MR. BOIES: I think pending resolution of the instructions not to answer, I don't have any further questions at this time. If you give me a minute, just to check.

Thank you very much.

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closed.

If there are questions that I have instructed the witness not to answer and it later turns out the judge disagrees with my characterization, we will be back to revisit it, but we are done as far as I'm concerned.

MR. BOIES: The deposition is not closed. There are a number of instructions not to answer. I think it is a fair point that if the court were to conclude that none of the questions that have been instructed need to be answered, we're not going to be continuing the deposition, barring some additional information coming to light.

MR. PAGLIUCA: I think we agree then.

THE VIDEOGRAPHER: The time is 2:51 p.m., and we are going off the record. (Time noted: 2:51 p.m.)

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6		GHISLAINE MAXWELL		PAGE		6		---			
7		By Mr. Boies		4		7					
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12		EXHIBIT		PAGE		12					
13		Exhibit 26	List of names	23		13					
14		Exhibit 27	Article	94		14					
15		Exhibit 28	List of names	135		15					
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3		D E P O S I T I O N				3					
4		S U P P O R T I N D E X				4					
5		---				5		I HEREBY CERTIFY that GHISLAINE			
6		Direction to Witness Not to Answer				6		MAXWELL, was duly sworn by me and that the			
7		Page Line	Page Line	Page Line		7		deposition is a true record of the testimony			
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16		174 5	175 9	175 17		16		this transcript does not apply to any			
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18		186 23				18		under the direct control and/or supervision			
19		---				19		of the certifying reporter.)			
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1
2 ACKNOWLEDGMENT OF DEPONENT
3
4

5 I, , do hereby
6 certify that I have read the foregoing pages,
7 and that the same is a correct transcription
8 of the answers given by me to the questions
9 therein propounded, except for the
10 corrections or changes in form or substance,
11 if any, noted in the attached Errata Sheet.
12
13
14

15
16 GHISLAINE MAXWELL DATE
17
18
19

20 Subscribed and sworn
21 to before me this
22 day of , 2016.
23 My commission expires:
24
25

Notary Public

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