

COMPOSITE  
EXHIBIT 2  
(File Under Seal)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

\*\*CONFIDENTIAL\*\*

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

- - -

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

1 G Maxwell - Confidential

2 underage?

3 A. I can only testify to what I saw  
4 and what I was present for, so if you are  
5 asking me what I saw then I am happy to  
6 testify. I cannot testify to what somebody  
7 else did or didn't do.

8 Q. Did you issue a statement to your  
9 press agent, Ross Gow in 2015, stating that  
10 Virginia Roberts' claims were, quote, obvious  
11 lies?

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

14 Q. You can answer.

15 A. You need to reask me the question.

16 Q. Sure.

17 Did you issue a press statement  
18 through your press agent, Ross Gow, in  
19 January of 2015, stating that Virginia  
20 Roberts' claims were, quote, obvious lies?

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

23 A. Can you ask it a different way,  
24 please?

25 Q. I will ask it again and you can

1 G Maxwell - Confidential

2 listen carefully.

3 Did you issue a press statement  
4 through your press agent, Ross Gow, in  
5 January of 2015, where you stated that  
6 Virginia Roberts' claims were, quote, obvious  
7 lies?

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

10 A. So my lawyer, Philip Barden  
11 instructed Ross Gow to issue a statement.

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

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

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

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

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

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

1 G Maxwell - Confidential

2 conduct with Virginia while Virginia was  
3 underage?

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

6 Q. You can answer.

7 A. Try again, please.

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

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

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

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

21 Is that a lie?

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

24 Q. You can answer.

25 A. So I cannot testify to what Ross

1 G Maxwell - Confidential

2 Gow and Philip Barden decided to put -- I can  
3 testify to what Virginia's obvious lies are  
4 as regards to me. I cannot make  
5 representations about all the many lies she  
6 may or may not have told about Jeffrey.

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

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

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

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

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

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