

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.
-----x

June 20, 2016

9:12 a.m.

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

Deposition of [REDACTED], pursuant
to notice, taken by Plaintiff, at the
offices of Podhurst Orseck, 25 West
Flagler Street, Suite 800, Miami, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

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A P P E A R A N C E S:

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E X H I B I T S

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Police Interview	

1 [REDACTED] - CONFIDENTIAL

2 spoke to police?

3 A. No, sir. I just want to make it very --
4 pardon me. I didn't mean to interrupt.

5 MR. JOSEFSBURG: Let me explain something
6 to both of you.

7 MR. EDWARDS: Sure.

8 MR. JOSEFSBURG: And for the record, [REDACTED]
9 has, since these events of 12 years ago,
10 received a lot of professional advice and gone
11 through an awful lot based upon what happened
12 12 years ago.

13 She has been advised and has followed the
14 advice to forget, suppress, repress what
15 happened, and that's how she goes on with her
16 life.

17 So she doesn't remember a lot of things,
18 and she doesn't want to remember them. So you
19 might interpret in other matters as hostility
20 from a witness. This is called
21 self-preservation and mental health.

22 So both her attitude and her memory is
23 based on that. We have someone who is badly
24 injured and is very frail and wants to take
25 care of herself. So you might think it's

1 [REDACTED] - CONFIDENTIAL

2 snippy, but it's just that she --

3 THE WITNESS: I truly don't know the
4 answers to your questions if I say I don't.
5 I'm trying to answer everything I know.

6 BY MR. EDWARDS:

7 Q. I can appreciate that.

8 When you spoke with police officers back
9 in October of 2005, did you tell them the truth?

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

12 THE WITNESS: Of course, yes.

13 BY MR. EDWARDS:

14 Q. Okay. And do you remember someone
15 named -- I think it's spelled phonetically in
16 here -- Shana Jasmine or something along those
17 lines, Shana Casman?

18 A. No, I do not recall.

19 Q. Do you remember a friend of yours being in
20 the room when you spoke with the police?

21 A. No, I do not.

22 Q. Do you remember how many police officers
23 you spoke with?

24 A. Over the course of all the years?

25 Q. That particular investigation.

1 [REDACTED] - CONFIDENTIAL

2 know the extent of their relationship. But she
3 would schedule his appointments and handle clerical
4 things for him as far as I can see.

5 Q. All right.

6 And when you first went to his house,
7 where did -- where were you taken within the house?

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

10 THE WITNESS: Kitchen, up to the room, up
11 to his master suite.

12 BY MR. EDWARDS:

13 Q. And which stairwell did you go up to his
14 suite?

15 A. I do not remember.

16 Q. Was it the stairs off by the kitchen?

17 A. I do not recall.

18 Q. And when you went into his bedroom, were
19 you under the belief that it was going to be you
20 providing some sort of a massage?

21 A. It certainly didn't involve any sexual
22 activity. That's what I was under the assumption.
23 I don't recall exactly how I was propositioned to
24 get there. I just was there, and all of a sudden
25 something horrible happened to me.

1 [REDACTED] - CONFIDENTIAL

2 Q. Did you, at 16 years old or 17 years old,
3 have any massage training or experience?

4 A. No.

5 Q. Did [REDACTED] have any massage
6 experience?

7 A. I do not -- I can't speak to her
8 experience. I do not know. She was not really a
9 friend of mine. Barely an acquaintance. We maybe
10 spoke three times in our entire going to school
11 together and everything.

12 Q. Did you ever learn what her incentive was
13 to bring you to Jeffrey Epstein's house?

14 A. Later I found out that they would get
15 kickbacks for bringing people over.

16 Q. Do you remember seeing Jeffrey Epstein
17 give her money that day?

18 A. I don't recall, no.

19 Q. If you said that in your statement, that
20 you remember [REDACTED] getting money for bringing you
21 here that day, would that be a true statement?

22 A. Yes, absolutely. Everything in there is
23 the truth. I do not remember from years ago at this
24 point.

25 MR. PAGLIUCA: Object to form and

1 [REDACTED] - CONFIDENTIAL

2 foundation.

3 BY MR. EDWARDS:

4 Q. If you want to --

5 A. I don't. It's okay.

6 Q. I understand.

7 A. Thank you.

8 Q. On page 6, you're telling the police that
9 "[REDACTED] and me were waiting on the couch in the
10 bathroom, and Jeffrey comes up and says -- he's
11 like, Hey, I'm Jeffrey. He just introduced himself,
12 and he hands [REDACTED] -- I remember this because I was
13 pissed off that she got paid to bring me. He hands
14 her a wad of hundred dollar bills and says, Thank
15 you. And she says, I'll wait for you downstairs.
16 And I was like, All right, I'll see you in a little
17 bit."

18 Does that remind you of [REDACTED] getting
19 paid to bring you?

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

22 THE WITNESS: It sounds like a familiar
23 scenario. I do not recall at this time.

24 BY MR. EDWARDS:

25 Q. Okay.

1 [REDACTED] - CONFIDENTIAL

2 A. I don't remember.

3 Q. I appreciate that.

4 MR. JOSEFSBURG: I'll make it easier for
5 both of you. Here's her testimony. As you
6 notice, she's not looking at this. She doesn't
7 want to look at it.

8 MR. EDWARDS: Yeah.

9 MR. JOSEFSBURG: She doesn't want to read
10 it. But this is a statement that she gave to
11 the police. She's saying that whatever she
12 said in it is true. Does she remember it now?
13 No, because she has done a good job of
14 forgetting it. But if she said it, she said
15 the truth. And when you read it to her now --

16 THE WITNESS: These are things I forgot.

17 MR. EDWARDS: It's not going to refresh
18 her.

19 MR. JOSEFSBURG: She doesn't want to
20 remember. So everything in it is true; she can
21 tell you without looking at it. She doesn't
22 want to look at it and she doesn't remember it.

23 Most of the important details that either
24 of you are looking for, she'll say it's the
25 truth but I don't remember that.

1 [REDACTED] - CONFIDENTIAL

2 MR. EDWARDS: Okay. I can appreciate
3 that.

4 MR. PAGLIUCA: Counsel, I appreciate the
5 record and I appreciate the clarification. So
6 as you know, I mean, there may be an attempt to
7 use any of this transcript as substantive
8 evidence at trial. So while I accept your
9 representation, I don't believe it lays any
10 foundation for any of the statements to the
11 police department. It doesn't lay any
12 foundation as to the truth or non-truth as to
13 the statement.

14 As I understand it, the witness has no
15 present recollection of these events. Looking
16 at this statement would not refresh her
17 recollection, is what has been established on
18 the record. The witness doesn't want to look
19 at the statement. And the witness' testimony
20 will be that she has no recollection of these
21 events; is that correct?

22 MR. JOSEFSBURG: Everything you said is
23 correct, with one other addition: That
24 whatever she said to the police back then was
25 the truth.

1 [REDACTED] - CONFIDENTIAL

2 MR. PAGLIUCA: That's where we may have a
3 disagreement.

4 MR. JOSEFSBURG: Okay, but that's what she
5 said.

6 MR. PAGLIUCA: I understand, but she did
7 testify to that earlier. I accept that.

8 MR. JOSEFSBURG: Right. She doesn't
9 remember and doesn't want to.

10 MR. PAGLIUCA: Understood.

11 MR. EDWARDS: I will proceed under those
12 parameters. I got it.

13 MR. JOSEFSBURG: By the way, just so -- is
14 what I just said correct?

15 THE WITNESS: Absolutely, yes. Thank you.

16 BY MR. EDWARDS:

17 Q. When you gave the statement to the police,
18 was your motivation to tell the truth?

19 A. Yes.

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

22 THE WITNESS: Yes, it was, absolutely.

23 BY MR. EDWARDS:

24 Q. Did you have any motivation in any part of
25 it not to tell the truth?

1 [REDACTED] - CONFIDENTIAL

2 Epstein?

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

5 THE WITNESS: Yes.

6 MR. EDWARDS: All right. I don't have
7 anything further for you. I apologize that we
8 even had to go through this, all right?

9 THE WITNESS: Okay.

10 E X A M I N A T I O N

11 BY MR. PAGLIUCA:

12 Q. [REDACTED] [REDACTED] by name is Jeff Pagluica. I
13 live in Denver, Colorado. And, like you, I don't
14 want to be here today either, okay? I would rather
15 be in Denver.

16 I just want to -- as I understand it, and
17 I'm not trying to get into any of your treatment
18 over the last, let's say, 10 years, because I don't
19 know how long it's been, but as I understand what
20 you and your lawyer have said here today, you have
21 been involved in some number of years of therapy, in
22 which the purpose -- part of the purpose of the
23 therapy has been to forget all of these events that
24 Mr. Edwards was asking you questions about; is that
25 correct?

1 [REDACTED] - CONFIDENTIAL

2 A. How specific do I have to get about my
3 doctors' appointments? I don't really --

4 Q. I'm not asking --

5 MR. JOSEFSBURG: Not at all.

6 BY MR. PAGLIUCA:

7 Q. I'm not asking those questions. I'm just
8 asking, if, as your lawyer has said --

9 A. I understand the question.

10 Part of the therapy, yes, it did encompass
11 copings skills, and this is the one I have chosen to
12 use.

13 Q. Which is, I don't want to remember
14 anything?

15 A. Yes. Repression. I don't want to
16 reminisce.

17 Q. And you indicated as you sit here today,
18 you don't recall specifics related to these events?

19 A. That's correct. I have worked very hard
20 not to.

21 Q. Back in 2005, and, again, if you have no
22 recollection of these things, that's fine, you were
23 contacted by a Detective Recarey.

24 Do you recall that or not?

25 A. No, I don't.

1 [REDACTED] - CONFIDENTIAL

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA)

4 COUNTY OF MIAMI-DADE)

5

6 I, the undersigned authority, certify that
[REDACTED] personally appeared before me and
was duly sworn.

7 WITNESS my hand and official seal this
23rd day of June, 2016.

8

9

10 Kelli Ann Willis, RPR, CRR
Notary Public, State of Florida
Commission FF928291, Expires 2-16-20

11 + + + + +

12 CERTIFICATE

13 STATE OF FLORIDA)

14 COUNTY OF MIAMI-DADE)

15 I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
16 Reporter do hereby certify that I was
authorized to and did stenographically report the
17 foregoing deposition of [REDACTED]; that a
review of the transcript was not requested; and
18 that the transcript is a true record of my
stenographic notes.

19 I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
20 of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
21 with the action, nor am I financially interested
in the action.

22 Dated this 23rd day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25