

**EXHIBIT 3**  
**(File Under Seal)**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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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.

1 [REDACTED]  
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.

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[REDACTED]

2

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

4

A. No.

5

Q. Did [REDACTED] have any massage experience?

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

12

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

14

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

16

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

18

A. I don't recall, no.

19

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

22

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

25

MR. PAGLIUCA: Object to form and

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2 into?

3 A. I worked very, very hard to not recall  
4 anything specific about my sexual encounters with  
5 this person as one of his victims. I cannot answer  
6 your question. Things -- it wasn't supposed to be  
7 sexual, but it was. That's as specific as I can  
8 get.

9 Q. Fair to say that when Jeffrey Epstein or  
10 his assistants used the term "massage," someone is  
11 going to come give a massage, that that's always a  
12 sexual encounter?

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

15 THE WITNESS: "Always" is a strong word to  
16 use. I'm not making that assumption, but  
17 oftentimes that's exactly what it meant.

18 BY MR. EDWARDS:

19 Q. When Jeffrey Epstein was paying high  
20 school girls for these alleged massages, he was  
21 paying to turn it into a sexual encounter, fair?

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

24 THE WITNESS: I would say yes, that is the  
25 motivation. I'm not a mind-reader. I don't

1

[REDACTED]  
know what he was thinking. It's fair to  
assume.

4 BY MR. EDWARDS:

5 Q. All right.

6 Did you know how [REDACTED] met  
7 Jeffrey Epstein?

8 A. No.

9 Q. Do you know someone named Hayley Robson?

10 A. No.

11 Q. Did you know Tony Figueroa?

12 A. No. It sounds like a familiar name, but I  
13 do not know him.

14 Q. Did you know Ashley Davis?

15 A. I may have gone to high school with an  
16 Ashley Davis, but that seems like a very common  
17 name.

18 Q. Were you asked by Jeffrey Epstein to bring  
19 other girls to him?

20 A. Yes.

21 Q. And for what purpose?

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

24 BY MR. EDWARDS:

25 Q. What is his stated purpose?

1

2 A. I was never present when he interacted  
3 with those women. I don't know exactly what  
4 happened.

5 Q. Did you bring other girls to him?

6 A. Yes. I brought friends over.

7 Q. And were they also of similar age to you?

8 A. Yes. They were my peers.

9 Q. High school girls?

10 A. Correct.

11 Q. Did any of them have massage experience?

12 A. I do not know.

13 MR. PAGLIUCA: Object to form.

14 BY MR. EDWARDS:

15 Q. Were you going out to look for a massage  
16 therapist, a professional massage therapist to bring  
17 to him?

18 A. No.

19 Q. What he wanted at his house was young high  
20 school girls under the pretense of some massage?

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

23 BY MR. EDWARDS

24 Q. Is that fair?

25 MR. PAGLIUCA: Object to form and

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[REDACTED]

foundation.

THE WITNESS: Yes, that's fair. I mean, I have to think. Sometimes I would go over and I would just swim and I would get paid, or I would take a nap and I'd get paid, or I would just hang out and I'd get paid. So that should be in my statement as well.

It wasn't my assumption that they were coming over to do anything. I did not know, once the door was closed or once they went to another area of the home. I often just went over and did my own thing while they were doing whatever they were doing. It was none of my business.

BY MR. EDWARDS:

Q. When you would say you would just hang out at the pool, who would you be with?

A. I don't remember anyone. None of those girls were any friends. We were all there just through that mutual connection.

Q. I just have a list of girls, and I want you to tell me whether you know who they are or you don't.

Do you know Felicia Esposito?



1

2 BY MR. EDWARDS:

3 Q. When you got to his house, you were  
4 requested to give a massage?

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

7 THE WITNESS: I don't exactly remember. I  
8 don't remember if I was asked in the kitchen.  
9 I don't remember if -- I don't remember.

10 BY MR. EDWARDS:

11 Q. Massage was part of the game, though?

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

14 THE WITNESS: I don't remember. I'm  
15 sorry.

16 BY MR. EDWARDS:

17 Q. But even during this deposition today, we  
18 have described at times you giving him a massage?

19 A. Yes. You're asking about my first  
20 encounter, though.

21 Q. Sorry, I'm just trying to sum up the whole  
22 thing.

23 A. Okay.

24 Q. Was massage part of the lure to get you  
25 specifically to his house?

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2 A. Yes.

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

5 BY MR. EDWARDS:

6 Q. And at the time, you are 15, 16 or 17  
7 years old?

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

10 THE WITNESS: Yes.

11 BY MR. EDWARDS:

12 Q. No massage experience?

13 A. No.

14 Q. You were told to bring other girls to his  
15 house?

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

18 THE WITNESS: After a while, yes.

19 BY MR. EDWARDS:

20 Q. These massages were turned sexual by  
21 Jeffrey, as opposed to by anyone else?

22 A. Jeffrey took my clothes off without my  
23 consent the first time I met him.

24 Q. The massages were scheduled by people  
25 working for Jeffrey?

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2 A. I don't recall.

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

5 BY MR. EDWARDS:

6 Q. Jeffrey Epstein, during these massages,  
7 would use sex toys or have sex toys used?

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

10 THE WITNESS: Well, at that point, it's no  
11 longer a massage. Something else is going on.  
12 But, yes, he would take out adult toys and  
13 different things.

14 BY MR. EDWARDS:

15 Q. While you were a teenager, Jeffrey Epstein  
16 asked you to live with him?

17 A. Yes. He wanted me to be emancipated.

18 Q. Jeffrey Epstein encouraged girl-on-girl  
19 sex?

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

22 THE WITNESS: Yes.

23 BY MR. EDWARDS:

24 Q. And after you cooperated with the police,  
25 you were intimidated by people working for Jeffrey

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2 Epstein?

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MR. PAGLIUCA: Object to form and  
foundation.

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THE WITNESS: Yes.

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

9

THE WITNESS: Okay.

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E X A M I N A T I O N

11

BY MR. PAGLIUCA:

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

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

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[REDACTED]

CERTIFICATE OF OATH

STATE OF FLORIDA )  
COUNTY OF MIAMI-DADE )

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

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

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

+ + + + +

CERTIFICATE

STATE OF FLORIDA )  
COUNTY OF MIAMI-DADE )

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

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

Dated this 23rd day of June, 2016.

KELLI ANN WILLIS, RPR, CRR