

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

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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.

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Also Present:
James Christe, videographer

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2 Q. Would you visit more than one
3 university to try to find individuals to work
4 for Jeffrey Epstein?

5 A. As I recollect, I think that's, in
6 fact, the only university I went to.

7 Q. Did you go there more than once?

8 A. I think I went twice.

9 Q. Who else did you find from that
10 university, was there anybody other than

11

██████████

12 A. I don't recollect, I'm sorry.

13 Q. We are going to mark this as
14 Maxwell 13?

15 (Maxwell Exhibit 13, documents,
16 marked for identification.)

17 Q. Can you take a look at the document
18 I put in front of you, please.

19 Are you familiar with this
20 document?

21 A. I'm familiar with this actual
22 document.

23 Q. How was this document created?

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

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2 A. I don't know how this document was
3 created.

4 Q. You were involved in the creation
5 of this document?

6 A. I think you can see from the date
7 that it's 2004, 2005, so no.

8 Q. You weren't involved in the
9 creation of this document.

10 Did you -- we talked earlier about
11 Mr. Epstein's house, I'm talking about the
12 Palm Beach house where you said there was a
13 computer on the desk, that employees had
14 access to -- people who worked for Jeffrey
15 Epstein may have had access to?

16 A. I think anybody could have had
17 access to that.

18 Q. Was that computer used, if you know
19 to keep a log of addresses and phone contact
20 information for Jeffrey Epstein?

21 A. Are we talking about when this
22 document was created.

23 Q. In general, was there, on that
24 computer during the time that you were
25 present with Jeffrey Epstein, was there a

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2 mechanism by which you kept electronic
3 information of names and addresses of
4 individuals that he knew?

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

7 A. I can't testify to what was on that
8 computer or not after I was gone.

9 Q. Not when you were gone, when you
10 were there. If Jeffrey wanted to call, for
11 example, say [REDACTED], would someone be
12 able to go to that computer to pull up the
13 address information and phone contact
14 information for that individual?

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

17 A. I couldn't possibly say.

18 Q. Did you ever have to keep track of
19 address or phone contact information for
20 Jeffrey Epstein?

21 A. That was not my job.

22 Q. Did you ever do it?

23 A. I am not responsible for keeping
24 his numbers so that wasn't my job at all.

25 Q. But did you ever do it? I know

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2 it's not your job but did you ever do it, did
3 you ever keep phone contact information for
4 him?

5 A. During the course of the time we
6 were together, if he gave me a telephone
7 number, I would give it to an assistant to
8 put in the computer, I could do that.

9 Q. Would he ask you for contact
10 information for different individuals, if he
11 wanted to contact someone?

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

14 A. In the course of the long period of
15 time when I was there, it certainly would be
16 possible for him to ask me for a telephone
17 number and if I had the -- I wouldn't always
18 have it -- I'm sure it happened.

19 Q. Was there a hardcopy book in
20 addition to the computer, a hardcopy book
21 that you could look for numbers that were
22 relevant to Jeffrey Epstein's life and
23 something on the computer or was it just an
24 electronic version?

25 MR. PAGLIUCA: Objection to the

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2 form and foundation.

3 Q. Was there a hard copy book as well
4 as something on the computer or was there
5 only electronic information on the phone
6 numbers?

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

9 A. I can only testify to what I know
10 obviously, and I believe that this is a copy
11 of a stolen document. I would love to know
12 how you guys got it.

13 Q. I'm asking during the time you
14 worked for Jeffrey Epstein, was there a
15 hardcopy document of any kind that kept phone
16 numbers for Jeffrey Epstein, if he needed to
17 contact someone?

18 A. The stolen document I have in front
19 of me that you have is what you are referring
20 to.

21 Q. So there was, during your time when
22 you were there, there was no other, you
23 mentioned there was information on a
24 computer. Was there any hardcopy document
25 that you could refer to to find someone's

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2 number?

3 A. You have the stolen document in
4 front of you.

5 Q. You had access to this when you
6 worked for Jeffrey Epstein?

7 A. This is, I believe, the book that
8 was stolen, that was the hardcopy of whatever
9 was there.

10 Q. So when you were working for
11 Jeffrey Epstein, you were able to access this
12 book?

13 A. This book -- if this is what this
14 is, I believe it was, this is the stolen
15 document from his house.

16 Q. And you were able to access it when
17 you worked for him?

18 A. It was a document that was printed
19 that you could, if you needed to, look for a
20 number.

21 Q. Do you know how this book was
22 created?

23 A. No.

24 Q. When you referred to it a moment
25 ago, to a stolen document, when [REDACTED]

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2 [REDACTED] turned this document over to the
3 FBI, are you aware he described it as a
4 document that came from your computer?

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

7 A. I have no idea what he said or
8 didn't say, so if you want me to reference
9 something he said, you need to show it to me.

10 Q. Did you keep this document, an
11 electronic copy of it, on your personal
12 computer?

13 A. I don't recollect.

14 Q. If you had to update something, for
15 example, if there was a new number, a new
16 individual that Jeffrey had hired that you
17 were going to track, would you input that
18 information into this document on your
19 computer?

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

22 A. I've already testified that I'm not
23 responsible for updating and keeping these
24 records.

25 Q. Did you have this document on your

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2 computer, your personal computer?

3 A. I told you, I don't recollect
4 having this document on my computer.

5 Q. Do you know what computers this
6 document was on, if more than one?

7 A. I'm sorry, this is a long time ago
8 and I don't recall exactly how this was all
9 managed.

10 Q. If you didn't create this document,
11 do you know who did?

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

14 A. I don't.

15 Q. I'm going to direct your attention
16 to part of this document. It's towards the
17 back, it's going to be page 91 and it has
18 bates label Giuffre 001663. I'm going to
19 direct your attention to the section that
20 says, Massage Florida.

21 Did you input any of the names or
22 numbers under that section?

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

25 A. So this document is produced in

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2 2004, 2005, so, no.

3 Q. But I'm sorry, correct me if I'm
4 misunderstanding your testimony, I thought
5 you said when you were working with Jeffrey,
6 that this document existed and it was
7 something you utilized?

8 A. I can't possibly tell you what
9 numbers were added or not added subsequent to
10 my departure.

11 Q. So you can't recall if you added
12 any of these numbers?

13 MR. PAGLIUCA: Objection to the
14 form and foundation, mischaracterizes
15 the witness' testimony.

16 Q. Are there any numbers on here or
17 names that you recognize that you would have
18 entered into this section?

19 A. I already testified that I'm not
20 responsible for inputting numbers and names
21 into this so I would not be able to tell you.

22 Q. Are there any names or numbers
23 under this section, Massage Florida, that you
24 would have provided to an assistant to input
25 into this document?

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2 A. I can't possibly say.

3 Q. Do you see under Massage Florida,
4 about halfway down the first column, do you
5 see a number that says [REDACTED] cell?

6 MR. PAGLIUCA: What page?

7 Q. It's 91, Bates number 001663.
8 About halfway down, it says in the first
9 column, it says [REDACTED] cell.

10 Do you see that?

11 A. I do.

12 Q. Would you have provided after, I
13 know you didn't hire her, Jeffrey hired her
14 but after you brought her to Jeffrey, would
15 you have given her cell phone number to an
16 assistant to input into this document?

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

19 A. I didn't bring her to Jeffrey, the
20 way you characterize and I would have no
21 knowledge of how this number ended up in this
22 book.

23 Q. I believe you, and I will try to
24 use your words so we are clear, you met
25 [REDACTED] is that correct?

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2 A. Yes.

3 Q. And then she began working for
4 Jeffrey?

5 A. Yes.

6 Q. Would you have provided whomever
7 was in charge of keeping this updated with
8 [REDACTED] cell number so you would be able to
9 contact her if needed?

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

12 A. I don't know. It could have been a
13 number of different ways, it it could have
14 been Jeffrey who gave it to somebody.

15 Q. You just don't remember doing that?

16 A. I do not.

17 Q. Now, as you look -- I want you to
18 take a look at the Florida massage list, it's
19 three columns there.

20 Do you, as you look at those names
21 on the various columns, do you know the ages
22 of any of the girls in this list?

23 A. I don't know. One, I don't know
24 who all the people are on this list and I
25 certainly don't know the ages.

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2 Q. Do you know what their
3 qualifications are?

4 A. I don't know who the people are in
5 general so of course I don't know what their
6 qualifications are.

7 Q. Do you know why Jeffrey has so many
8 masseuses listed in Florida in his book here?

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

11 A. Again, this book was created post
12 my departure, so I couldn't explain why all
13 these people were here.

14 Q. When you were there, you said this
15 book existed?

16 A. Yes.

17 Q. So when you were there, were there
18 a number of masseuses listed under the
19 Florida massage?

20 MR. PAGLIUCA: Objection to the
21 form and foundation and
22 mischaracterization of the witness'
23 testimony.

24 Q. I'm asking you a question.

25 When you were there, were there a

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2 number of masseuses listed under the Florida
3 massage section?

4 A. When I was there, I would have, of
5 course there would have been some masseuses
6 listed but I could not tell you who or how
7 many and this -- I could not possibly because
8 I wouldn't remember.

9 Q. Do you know why Jeffrey would have
10 had so many names listed under his massage
11 Florida?

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

14 A. I can't testify to why Jeffrey has
15 so many.

16 Q. Did he use a different masseuse
17 every day?

18 MR. PAGLIUCA: Objection to the
19 form and foundation.

20 Q. You can answer.

21 A. When I was there he had a massage
22 roughly every day, one masseuse, and mostly
23 he would have them at random times, so it
24 would be difficult if you just only had one
25 person, man, woman, for an adult massage, to

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2 come and be available for whatever time it
3 was. So he would have more than one person
4 that he could call for a massage because at
5 any given time the one that he called first
6 may not have been available.

7 Q. So would it typically be a
8 different person each day that would give him
9 a massage?

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

12 A. It would be, when I was there,
13 based on availability.

14 Q. Would it surprise you to learn that
15 the Federal Government found that some of the
16 girls on this list under massage Florida were
17 under the age of 18?

18 MR. PAGLIUCA: Objection to the
19 form and foundation.

20 A. I can't testify to what the
21 government found or did not find because I
22 would have no knowledge of it.

23 Q. I'm asking if you would be
24 surprised by that?

25 MR. PAGLIUCA: Form and foundation.

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2 A. I have knowledge of it. I can't
3 speculate.

4 Q. On the second column, towards the
5 bottom, there is the name, it's one up from
6 the bottom, there is the name [REDACTED],
7 do you know [REDACTED]?

8 A. I do.

9 Q. Who is she?

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

11 Q. Is she a masseuse?

12 A. She, I don't think she was a
13 masseuse, no.

14 Q. Why would be she listed under
15 Florida massages?

16 A. An input error.

17 Q. Is this list any individual that
18 would have sex with Jeffrey?

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

21 A. I wouldn't have any knowledge of
22 that.

23 Q. Do you know if Jeffrey had sex with
24 [REDACTED]?

25 MR. PAGLIUCA: Object to the form

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2 and foundation.

3 A. First of all, I wouldn't have any
4 knowledge of that.

5 MS. McCAWLEY: We are going to take
6 a quick break.

7 THE VIDEOGRAPHER: It's now 4:39
8 and we are off the record.

9 (Recess.)

10 THE VIDEOGRAPHER: It's now 4:54
11 and we are as back on the record
12 starting disk number 8.

13 Q. Ms. Maxwell, we were talking
14 earlier about the journal and I believe you
15 said in 2004, 2005, you were no longer
16 working and responsible for that journal, is
17 that correct?

18 MR. PAGLIUCA: Objection to the
19 form and foundation.

20 A. What are we referring to, this
21 document right here?

22 Q. Yes.

23 A. I don't know who is the author of
24 this or I can't tell you what is in here
25 versus what would have been here when I was