

EXHIBIT 1

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

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



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2 form and foundation of the question.

3 Q. You can answer the question.

4 A. First of all, can you please
5 clarify the question. I don't understand
6 what you mean by female, I don't understand
7 what you mean by recruit. Please be more
8 clear and specific about what you are
9 suggesting.

10 Q. Are you a female, is that the sex
11 that you are?

12 A. I am a female.

13 Q. That's what I'm referring to a
14 female and I'm asking you when you first, the
15 very first time you recruited a female to
16 work for Mr. Epstein?

17 A. Again, I don't understand what
18 female -- I am a 54 year old women.

19 Q. I'm not making it age, any age of a
20 female that you recruited to work for Mr.
21 Epstein?

22 A. Again, I was somebody who hired a
23 number of people to work for Mr. Epstein and
24 hiring is one of my functions.

25 Q. And when is the first time you

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2 hired someone to work for Mr. Epstein, a
3 female?

4 A. As best as I can recollect, a woman
5 the age probably of about 40 or 50 was in
6 sometime in 1992.

7 Q. How long did you work for Mr.
8 Epstein?

9 A. I started working for him at some
10 point in 1992 and the nature of my work
11 relationship with him changed over time so
12 from around 2002, 2003, the work lessened
13 considerably.

14 Q. When did you --

15 MR. PAGLIUCA: Can I interject for
16 a moment. If we are talking about
17 background --

18 MS. McCAWLEY: I'm in the middle of
19 a question. Let me finish it and then
20 can you interject.

21 Q. When you say 2002 to 2003 that the
22 work lessened, when did you complete working
23 for Mr. Epstein; when was the last time you
24 were employed by him, the last date?

25 A. I believe I still was doing --

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2 helping him in a very nominal way, maybe an
3 hour or two a year at sometime 2008 and 2009.

4 MR. PAGLIUCA: So if you are going
5 to be talking about general background,
6 I don't need to designate that as
7 confidential. So if you want to have
8 them come back in, that's fine.

9 I assumed by your first question
10 you were going into more sensitive
11 areas. I will leave it up to you, but
12 if this is general background it will
13 not be designated as confidential.

14 MS. McCAWLEY: I appreciate that.
15 I will jump back into my other
16 questions.

17 MR. PAGLIUCA: So we will keep it
18 as confidential.

19 Q. When you were first employed by him
20 in 1992, what were you hired to do?

21 A. First, I was consulting and what I
22 did was I helped with decorating houses and
23 in hiring staff to help run those houses.

24 Q. Did your duties change over the
25 course of 1992 to 2009?

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

4 A. My job entailed running the homes
5 that he had but much more importantly, most
6 of the houses had construction and so whilst
7 in 1992 there was no construction project,
8 there was construction projects that began
9 after that time and I was in charge not only
10 of hiring architects, I was also in charge of
11 all the filings or overseeing that, like a
12 general contractor would.

13 I also helped with hiring the
14 architects, hiring the builders, reviewing
15 the contracts for the builders, coordinating
16 the building projects, coordinating how the
17 projects would layout, the timing of the
18 projects and all the various materials that
19 they would require to run a very substantial
20 building project. That's the nature of the
21 job I was dealing with.

22 Q. How old was the youngest female you
23 ever hired to work for Jeffrey?

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

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2 30 girls --

3 A. I did not count the number of girls
4 and I did read the police report. I can only
5 testify to what I read.

6 Q. So you are aware that the police
7 report contains reports from 30 underage
8 girls?

9 A. I can't testify to what the girls
10 said. I can only testify to the fact that I
11 read a police report that stated that.

12 Q. Were you working for Jeffrey -- you
13 said you worked for him off an on until 2009,
14 is that correct?

15 A. I helped out from time to time.

16 Q. So you were working with him during
17 the time period when these underage girls
18 were visiting Jeffrey's home?

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

21 A. I was not -- what year, I need
22 years.

23 Q. How about let's say 2005?

24 A. I'm not sure I was at the house at
25 all in 2005, maybe one day, maybe.

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2 knowledge there are 30 people --

3 MS. McCAWLEY: Just like can you if
4 you read through -- I will not argue
5 with you counsel.. she can answer yes or
6 no.

7 Q. Are you aware there were over 30
8 individuals who were minors who gave reports
9 to police just like the one we just read that
10 they were sexually assaulted by Jeffrey
11 Epstein in the Palm Beach home during the
12 years that you were working with him?

13 MR. PAGLIUCA: Objection to the
14 form and foundation. You can answer if
15 you have knowledge.

16 A. I already testified I was limited
17 in the house, a couple of days, there is no
18 way I knew. I have read these reports. I
19 cannot testify to 30. Given the experience
20 I've had with Virginia's lies, it's very hard
21 for me to testify about what I see. I can
22 tell from you my personal knowledge I did not
23 know what you are referring to.

24 Q. You did not know there were
25 underage girls in the home that were being

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2 assaulted by Jeffrey Epstein during the time
3 you were working there?

4 A. Based on the lies that I have
5 already been told, I cannot comment on any --

6 Q. Are you saying these 30 girls are
7 lying when they gave these reports to police
8 officers?

9 A. I'm not testifying to their lies.
10 I'm testifying to Virginia's lies.

11 Q. I am not asking about Virginia's
12 lies.

13 A. I can only testify to Virginia's
14 lies. I can testify to having read these
15 reports. I cannot testify to anything else
16 about them.

17 Q. So your testimony is that during
18 the time you were working there, you did not
19 know that these minor children were being
20 abused in the home while you were there?

21 A. What I have already told you and I
22 will repeat, I was in the house very limited
23 times, very few times. I do not know what
24 you are referring to. I've read these
25 reports but based on the lies that Virginia

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2 has perpetrated, cannot tell you what is true
3 or factual or not.

4 Q. You said you were in the home a
5 very limited time, so average in the year for
6 example, 2004, how many times would you have
7 been in his Palm Beach home?

8 A. Very hard for me to state but very
9 little.

10 Q. How about his New York home?

11 A. Same.

12 Q. Were you his girlfriend in that
13 year, in 2004?

14 A. Define what you mean by girlfriend.

15 Q. Were you in a relationship with him
16 where you would consider yourself his
17 girlfriend?

18 A. No.

19 Q. Did you ever consider yourself his
20 girlfriend?

21 A. That's a tricky question. There
22 were times when I would have liked to think
23 of myself as his girlfriend.

24 Q. When would that have been?

25 A. Probably in the early '90s.

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2 Q. I'm asking the questions. I know
3 what this case is about. I'm trying to -- I
4 will ask you questions if you don't
5 understand the question I can break it down
6 for you. I'm happy to do that.

7 A. Break it down a lot please.

8 Q. I will do that.

9 The question is, have you ever said
10 to anybody that you recruit other girls --

11 A. Why don't you stop there.

12 Q. Let me finish my question.

13 Have you ever said to anybody that
14 you recruit girls to take the pressure off
15 you, so you won't have to have sex with
16 Jeffrey, have you said that?

17 That's the question?

18 A. You don't ask me questions like
19 that. First of all, you are trying to trap
20 me, I will not be trapped. You are asking me
21 if I recruit, I told you no. Girls meaning
22 underage, I already said I don't do that with
23 underage people and as to ask me about a
24 specific conversation I had with language, we
25 talking about almost 17 years ago when this

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2 took place. I cannot testify to an actual
3 conversation or language that I used with
4 anybody at any time.

5 Q. Have you ever said to anybody that
6 you recruit other females over the age of 18
7 to take the pressure off you to having to
8 have sex with Jeffrey?

9 A. I totally resent and find it
10 disgusting that you use the word recruit. I
11 already told you I don't know what you are
12 saying about that and your implication is
13 repulsive.

14 Q. Answer my question.

15 A. I just did.

16 Q. Have you ever said to anybody that
17 you recruit females --

18 A. I don't recruit anybody.

19 Q. That's an answer. So you never
20 said that?

21 A. I'm testifying that I cannot
22 testify to an actual language --

23 Q. It's a yes or no.

24 A. I will not testify to an actual
25 statement made 17 years ago, so I cannot

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2 that he may have met socially through me.

3 Q. Did you ever introduce [REDACTED]

4 [REDACTED] to Virginia in London?

5 A. I understand her story about London

6 but again, her tissue of lies is extremely

7 hard to pick apart what is true and what

8 isn't. Actually I wouldn't recollect her at

9 all but for her tissue stories about this

10 situation.

11 Q. So did you ever introduce [REDACTED]

12 [REDACTED] to Virginia in London?

13 A. I have no recollection.

14 Q. Did Virginia ever stay at your home
15 in London, your town home?

16 A. I know she claims she did but if
17 you are asking me here today to remember
18 specifically, I cannot.

19 Q. Do you remember taking a trip with
20 Virginia to travel over to Europe, including
21 London?

22 A. So I have seen her reports and I
23 have seen the plane reports. I see she says
24 she was on that but again, I really have no
25 recollection of her.

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2 Q. Did you know that she was 17 at the
3 time of that trip?

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

6 A. I have --

7 Q. Did you know she was 17 at the time
8 of that trip?

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

11 A. I didn't even know she was on the
12 trip.

13 Q. Did you hold her passport for her
14 when she was traveling?

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

17 A. I have no recollection whatsoever
18 of her even being on the trip nor holding her
19 passport.

20 (Maxwell Exhibit 4, picture, marked
21 for identification.)

22 Q. I'm showing you what we marked as
23 Maxwell Exhibit 4.

24 Can you take a look at that picture
25 for me?

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2 A. I've looked at it.

3 Q. Are you in that picture?

4 A. I am.

5 Q. [REDACTED]

6 [REDACTED]
7 A. It is.

8 MR. PAGLIUCA: I don't believe this
9 has been produced to us in discovery by
10 you.

11 MS. McCAWLEY: The picture?

12 MR. PAGLIUCA: Yes.

13 MS. McCAWLEY: It has.

14 MS. MENNINGER: Is it the same
15 exact photograph.

16 MS. McCAWLEY: I believe so. We
17 will find one. The picture has been
18 produced a number of times.

19 MR. PAGLIUCA: I've seen different
20 iterations of this, I don't believe I
21 have ever seen this.

22 MS. McCAWLEY: We had them blow it
23 up on a page so she could see it. We
24 could use an article.

25 While you are looking for that, I

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2 will skip ahead. Hold that until we can
3 find one that has the Bates range on it.

4 Q. Do you recall Virginia being at
5 your London town home?

6 A. I do not.

7 Q. Do you recall going to dinner with
8 [REDACTED] Jeffrey Epstein and Virginia
9 Roberts in London, at any time?

10 A. I do not.

11 Q. Do you recall going to a place
12 called [REDACTED] [REDACTED], Jeffrey
13 Epstein and yourself and Virginia Roberts?

14 A. I would just like to state for the
15 record [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I do not have any recollection of it
21 and I doubt it actually happened.

22 Q. You don't recall that.

23 Do you recall taking Virginia
24 shopping when you were in London to buy an
25 outfit to meet [REDACTED]

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2 Q. So I'm directing your attention to
3 the bottom, two lines up from the bottom,
4 there is a flight --

5 MR. PAGLIUCA: Are you on [REDACTED]

6 MS. McCAWLEY: [REDACTED]

7 Q. So this flight is from, the one I'm
8 looking at, I think it's highlighted on your
9 copy. On the far corner on the date, it says
10 [REDACTED] at the top and this would be the [REDACTED]
11 and then the [REDACTED] are the two I'm going to
12 direct your attention to.

13 Q. On that first one on the [REDACTED] you
14 will see the column reading PBI in the from
15 column to TEB in the to column and you will
16 see some initials, you will see JE for
17 Jeffrey Epstein, GM for Ghislaine Maxwell, [REDACTED]
18 for [REDACTED] and then Virginia?

19 A. I have to object.

20 MR. PAGLIUCA: You don't get to
21 object.

22 Q. She is turning into a lawyer
23 already?

24 A. I would like to.

25 Q. Let me ask the question and if you

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2 have an issue -- so with respect to this
3 flight, do you recall being on a flight in
4 the -- [REDACTED] going from Palm Beach to
5 Teterboro?

6 A. No, I don't recall any specific
7 flight.

8 Q. Do you recall flying with Virginia
9 on a flight with [REDACTED] and Jeffrey
10 Epstein at any time?

11 A. I don't.

12 Q. How often did you fly on a plane
13 with a 17 year old?

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

16 A. I have no idea what you are talking
17 about, other than friends of mine that had
18 kids.

19 Q. Did you regularly fly on Jeffrey's
20 plane with individuals who were under the age
21 of 18?

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

24 A. Can you repeat the question?

25 Q. Did you regularly fly on Jeffrey

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2 Epstein's planes with individuals who were
3 under the age of 18?

4 A. I regularly flew on Jeffrey
5 Epstein's airplane but I cannot testify as to
6 flying with people under the age. I don't
7 believe that I did.

8 Q. Why wouldn't you remember flying
9 with a 17 year old?

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

12 A. How would I know, one, that she is
13 17, how would you know that, how do you know
14 I'm on the plane.

15 Q. Are you saying you are not on this
16 flight, so this is a Palm Beach to Teterboro.
17 This says the JE, GM ■ and Virginia. The GM
18 you are saying is not you?

19 MR. PAGLIUCA: I object to the
20 form. You can answer the question if
21 you know.

22 A. How do you know the GM is me.

23 Q. Is it your testimony that on the
24 flight logs when it represents GM that it is
25 not you flying on the plane?

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2 obvious lie that you approached Virginia
3 while she was under age at Mar-a-Lago?

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

6 A. First of all, we can all agree
7 here, all of you sitting here that the lies
8 that you perpetrated in the press that she
9 was 15 and we should all agree now that that
10 is fake, a lie that was perpetrated between
11 all of you to make the story more exciting,
12 can we agree on that?

13 Q. That is not my question.

14 A. Can we agree she was not the age
15 she said and you put that in the press, that
16 is obviously, manifestly, absolutely, totally
17 a lie.

18 MS. McCAWLEY: I am going to put on
19 the record, Ms. Maxwell very
20 inappropriately and very harshly pounded
21 our law firm table in an inappropriate
22 manner. I ask she take a deep breath,
23 and calm down. I know this is a
24 difficult position but physical assault
25 or threats is not appropriate, so no

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2 pounding, no stomping, no, that's not
3 appropriate,.

4 A. Can we be clear, I didn't threaten
5 anybody.

6 MR. PAGLIUCA: Stop, you made your
7 record, there is no dent in the table.
8 I don't see any chips. Can we take a
9 break now.

10 MS. McCAWLEY: I think it's
11 appropriate to take a break.

12 THE VIDEOGRAPHER: It's 1:56 and we
13 are off the record.

14 (Recess.)

15 THE VIDEOGRAPHER: It's now 2:13,
16 we're starting disk No. 5 and we are
17 back on the record.

18 Q. Ms. Maxwell, how old was Virginia
19 Roberts when you met her in Mar-a-Lago?

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

22 A. I know today that she was 17 years
23 old.

24 Q. Are you saying that it's an obvious
25 lie that Virginia traveled on Jeffrey

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2 Q. Were there other flights that you
3 recall flying on with Jeffrey Epstein that
4 were on flights that -- where [REDACTED] was
5 not the pilot?

6 A. [REDACTED] was not always the
7 pilot.

8 Q. How many planes did Jeffrey Epstein
9 have during the time you were with him?

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

12 A. So you need to give me a date
13 range.

14 Q. During the time period of 1992
15 through when you left your employment which I
16 think you said was in 2009?

17 A. So in the '90s he had one plane and
18 at some point in the 2000s he had two planes
19 but I can't testify to anything past 2002,
20 2003, what happened to his planes after that.

21 Q. Do you know what travel agency, if
22 any, Jeffrey would use when he would send
23 someone, for example, you or one of his other
24 employees on a flight somewhere? Did he use
25 a particular travel agency to make those

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ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby
certify that I have read the foregoing pages,
and that the same is a correct transcription
of the answers given by me to the questions
therein propounded, except for the
corrections or changes in form or substance,
if any, noted in the attached Errata Sheet.

GHISLAINE MAXWELL _____ DATE

Subscribed and sworn
to before me this
_____ day of _____, 2016.

My commission expires:

Notary Public