

EXHIBIT 6

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.

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



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Also Present:

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THE VIDEOGRAPHER: We are now on the record and recording. This begins disk No. 1 in the deposition of Ghislaine Maxwell in the matter of Virginia Giuffre versus Ghislaine Maxwell in the U.S. District Court for the Southern District of New York.

Today is April 22, 2016 the time is 9:04 a.m.. This deposition is being taken at 575 Lexington Avenue in New York at the request of Sigrid McCawley of Boies Schiller & Flexner.

The videographer is James Christe and the court reporter is Leslie Fagin. Will counsel state their appearance and whom they represent and then court reporter swear in Ms. Maxwell.

MS. McCAWLEY: My name is Sigrid McCawley with my colleague Meredith Schultz. We are with Boies Schiller & Flexner. We represent Ms. Giuffre.

MR. EDWARDS: Brad Edwards. I also represent Ms. Giuffre.

MR. CASSELL: Paul Cassell, I also

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2 represent Ms. Giuffre.

3 MR. PAGLIUCA: Jeff Pagliuca and

4 Laura Menninger on behalf of Ms.

5 Maxwell.

6 G H I S L A I N E M A X W E L L, called

7 as a witness, having been duly sworn by a

8 Notary Public, was examined and testified as

9 follows:

10 EXAMINATION BY

11 MS. McCAWLEY:

12 Q. Good morning. I'm going to explain

13 some of the rules that will happen with

14 respect to depositions.

15 Have you ever been deposed before?

16 A. I have not.

17 Q. What is going to happen here, we

18 have a court reporter and a videographer.

19 What they do is take down the words that we

20 say so when I ask you a question they will

21 record what you say in response to that. So

22 we have to be mindful that in order for them

23 to do their job we can't talk over each

24 other.

25 Another issue you have to be weary

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2 of is that in a response, you can't give a
3 nonverbal response, in other words, nodding a
4 yes or no, they need to hear verbal response
5 so they can record it on their transcript.
6 So that's important for you to remember as we
7 go through the day. If you forget, I will be
8 sure to remind you.

9 Is there anything that would
10 prevent you from giving truthful testimony
11 today?

12 A. There is not.

13 Q. You are not on any medications or
14 anything that would inhibit your ability to
15 remember or give truthful testimony?

16 A. I am not.

17 MR. PAGLIUCA: Could you identify
18 the assistant in the room.

19 MS. McCAWLEY: This is Emma Rosen
20 from our New York office. She is a
21 paralegal.

22 Q. Ms. Maxwell, can you please state
23 your address for the record?

24 A. Currently [REDACTED]

25 Q. What is your date of birth?

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2 A. [REDACTED]

3 Q. When did you first recruit a female
4 to work for Mr. Epstein?

5 MR. PAGLIUCA: I object to the form
6 and foundation of the question. I
7 believe this is confidential
8 information. I ask anyone who is not
9 admitted in this case be excused from
10 the room, please.

11 MS. McCAWLEY: So the response to
12 that question would --

13 MR. PAGLIUCA: The subject matter
14 of this question is confidential and I'm
15 designating it as confidential.

16 MS. McCAWLEY: I just want to make
17 that clear for the record.

18 MR. EDWARDS: So we don't delay the
19 deposition I will step out of the room
20 but I think it's important to lay the
21 record that --

22 MR. PAGLIUCA: I'm sorry, you are
23 not admitted in this proceeding so you
24 are not entitled to make any record. If
25 Ms. McCawley wants to make a record she

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2 can.

3 MR. EDWARDS: I can make a record
4 right now.

5 MR. PAGLIUCA: Maybe we should get
6 the judge on the phone and talk about
7 it.

8 MR. EDWARDS: The record will be
9 short. This is the precise reason why
10 Ms. Giuffre wants me in this case and
11 I'm unable to effectively represent her
12 at this time because I am unable to have
13 access to the confidential information
14 which includes apparently the entire
15 deposition of Ms. Maxwell. But for the
16 sake of not further delaying this, I
17 will be outside the room.

18 MS. McCAWLEY: Thank you.

19 A. I would like to just -- wait for
20 him to leave.

21 Q. That's fine.

22 A. I would just like to clarify the
23 address. I'm in the process of selling the
24 house so while while I still receive mail
25 there, it's not my actual physical address.

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2 It's in the process of being sold. It still
3 requires some final paperwork to be done, so
4 just for the purposes of clarity.

5 Q. Do you have a new address where you
6 will be living?

7 A. I do not.

8 Q. For the purpose of the record, if
9 there is something I ask you that you later
10 remember something else or need to correct
11 your testimony in some way, you can do that,
12 just let me know what it is and we will go
13 back to that question and can you clarify.

14 A. Of course. I just wanted to be
15 clear, there is still some paperwork pending
16 for final release, but it's in the process of
17 sale. But I don't have another address
18 currently, so whilst that should still be of
19 record that the mail could be forwarded
20 there, so for purposes of clarity I wanted to
21 be clear.

22 Q. I appreciate that.

23 So Ms. Maxwell, when did you first
24 recruit a female to work for Mr. Epstein?

25 MR. PAGLIUCA: Again. I object to

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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 Q. You can answer.

3 A. I have not any idea exactly of the
4 youngest adult employee that I hired for
5 Jeffrey.

6 Q. When you say adult employee, did
7 you ever hire someone that was under the age
8 of 18?

9 A. Never.

10 Q. Did you ever bring someone who was
11 under -- invite someone under the age of 18
12 to Jeffrey's home, any of his homes?

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

15 A. Can you repeat the question?

16 Q. Did you ever invite anybody who was
17 under the age of 18 to Jeffrey's homes?

18 MR. PAGLIUCA: Same objections.

19 A. I have a number of friends that
20 have children and friends of mine that have
21 kids and in the invitation of my friends and
22 their kids, I'm sure I may have invited some
23 of my friend's kids to come.

24 Q. Anybody that is not a friend of
25 yours.

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2 Any female under the age of 18, did
3 you invite them to come to Jeffrey's home?

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

6 A. Again, as I said, I am not aware of
7 inviting anybody other than friends of mine
8 who have children to the house.

9 Q. Did you invite Virginia Giuffre to
10 come to Jeffrey Epstein's home when she was
11 under the age of 18?

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

14 A. Virginia Roberts held herself out
15 as a masseuse and invited herself to come and
16 give a massage.

17 Q. My question is, did you invite
18 Virginia Roberts when she was under the age
19 of 18 to come to Jeffrey Epstein's home?

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

22 A. Again, Virginia Roberts was a
23 masseuse --

24 Q. I'm asking not asking if she was a
25 masseuse. I'm asking if you invited her to

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2 come to Jeffrey Epstein's home?

3 A. Again, there would be no course to
4 have a conversation with Virginia unless she
5 held herself out to be a masseuse.

6 Q. I'm not asking that question. I'm
7 asking if you invited her to come to Jeffrey
8 Epstein's home when she was under the age of
9 18?

10 A. Again, I repeat, she was a masseuse
11 and in the form and as my job, I was to have
12 people who he wanted for various things
13 including massage. She came as a masseuse.

14 Q. So you invited her to his home to
15 come to give a massage, is that correct?

16 MR. PAGLIUCA: Object to the form
17 and foundation. Misstates the witness'
18 testimony.

19 A. Again, I did not invite Virginia
20 Roberts. She came as a masseuse.

21 Q. She who invited her to come as a
22 masseuse, she just showed up at the front
23 door?

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

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2 A. Ms. Roberts held herself out --

3 Q. I'm not asking how she held herself
4 out. I'm asking how she arrived at the home.

5 Did you meet her and invite her to come to
6 the home or how did she arrive there?

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

9 A. Ms. Roberts held her to be a
10 masseuse and her mother drove her to the
11 house.

12 Q. When did you first meet Virginia
13 Roberts?

14 A. I don't have a recollection of the
15 first meeting.

16 Q. Do you recall meeting her at
17 Mar-a-Lago?

18 A. Like I said, I don't have a
19 recollection of meeting Ms. Roberts.

20 Q. So you recall Ms. Roberts being
21 brought to the home by her mother, is that
22 your testimony?

23 A. That is my testimony.

24 Q. And that is the first time you met
25 her?

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2 A. Like I said, I don't recall meeting
3 her the first time. I do remember her mother
4 bringing her to the house.

5 Q. Are you a member at Mar-a-Lago?

6 A. No.

7 Q. Have you visited Mar-a-Lago?

8 A. Yes.

9 Q. Did you visit Mar-a-Lago in the
10 year 2000?

11 A. I'm pretty sure I did.

12 Q. When Ms. Roberts arrived at the
13 home with her mother, what happened?

14 A. I spoke to her mother outside of
15 the house and she -- what I don't recall is
16 exactly what happened because I was talking
17 to her mother the entire she was in the
18 house.

19 Q. Did you introduce Ms. Roberts to
20 Jeffrey Epstein?

21 A. I don't recall how she actually met
22 Mr. Epstein. As I said, I spoke to her
23 mother the entire time outside the house.

24 Q. Did you walk Ms. Roberts up to the
25 upstairs location at the Palm Beach house to

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2 meet Mr. Epstein?

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

5 Q. You can answer.

6 A. I just explained.

7 A. I spent the entire time talking to
8 Virginia's mother outside the house so the
9 answer to the question is no.

10 Q. No, did you not walk her up and
11 introduce her to Mr. Epstein?

12 A. I just said no.

13 Q. Did you participate in a massage
14 this first time when she first came to the
15 home and you were speaking with her mother,
16 she was in the home, is that correct, you
17 brought her into the home?

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

20 A. I will repeat again, I was standing
21 outside with her mother so very difficult for
22 me to do anything else at that time so no, I
23 did not take her upstairs.

24 Q. Did you participate --

25 A. Virginia lied 100 percent about

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2 absolutely everything that took place in that
3 first meeting. She has lied repeatedly,
4 often and is just an awful fantasist. So
5 very difficult for anything to take place
6 that she repeated because I was with her
7 mother the entire time.

8 Q. So did you have -- did you give a
9 massage with Virginia Roberts and Mr. Epstein
10 during the first time Virginia Roberts was at
11 the West Palm Beach house?

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

14 Q. Yes or no?

15 A. No.

16 Q. Have you ever given a massage with
17 Virginia Roberts in the room and Jeffrey
18 Epstein?

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

21 A. No.

22 Q. Have you ever given Jeffrey Epstein
23 a massage?

24 MR. PAGLIUCA: Object to the form,
25 foundation. And I'm going to instruct

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2 you not to answer that question. I
3 don't have any problem with you asking
4 questions about what the subject matter
5 of this lawsuit is, which would be, as
6 you've termed it, sexual trafficking of
7 Ms. Roberts.

8 To the extent you are asking for
9 information relating to any consensual
10 adult interaction between my client and
11 Mr. Epstein, I'm going to instruct her
12 not to answer because it's not part of
13 this litigation and it is her private
14 confidential information, not subject to
15 this deposition.

16 MS. McCAWLEY: You can instruct her
17 not to answer. That is your right. But
18 I will bring her back for another
19 deposition because it is part of the
20 subject matter of this litigation so she
21 should be answering these questions.
22 This is civil litigation, deposition and
23 she should be responsible for answering
24 these questions.

25 MR. PAGLIUCA: I disagree and you

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2 understand the bounds that I put on it.

3 MS. McCAWLEY: No, I don't. I will
4 continue to ask my questions and you can
5 continue to make your objections.

6 Q. Did you ever participate from the
7 time period of 1992 to 2009, did you ever
8 participate in a massage with Jeffrey Epstein
9 and another female?

10 MR. PAGLIUCA: Objection. Do not
11 answer that question. Again, to the
12 extent you are asking for some sort of
13 illegal activity as you've construed in
14 connection with this case I don't have
15 any problem with you asking that
16 question. To the extent these questions
17 involve consensual acts between adults,
18 frankly, they're none of your business
19 and I will instruct the witness not to
20 answer.

21 MS. McCAWLEY: This case involves
22 sexual trafficking, sexual abuse,
23 questions about her having interactions
24 with other females is relevant to this
25 case. She needs to answer these

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2 questions.

3 MR. PAGLIUCA: I'm instructing her
4 not to answer.

5 MS. McCAWLEY: Then we will be back
6 here again.

7 Q. Have you ever given a massage to
8 Mr. Epstein with a female that was under the
9 age of 18?

10 A. Can you repeat the question?

11 Q. Yes. Have you ever given a massage
12 to Mr. Epstein with a female that was under
13 the age of 18?

14 A. No.

15 Q. Have you ever observed Mr. Epstein
16 having a massage given by an individual, a
17 female, who was under the age of 18?

18 A. No.

19 Q. Have you ever observed females
20 under the age of 18 in the presence of
21 Jeffrey Epstein at his home?

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

24 A. Again, I have friends that have
25 children --

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2 Q. I'm not talking about friends. I'm
3 talking about individuals --

4 MR. PAGLIUCA: I'm going to object
5 to you interrupting the witness who was
6 answering your question. The question
7 was, have you ever seen anyone, female
8 under the age of 18 at the house and
9 that's the question she was answering.
10 If you want to strike that question and
11 ask another question, feel free, but let
12 the witness respond, please.

13 MS. McCAWLEY: I will do that.

14 Q. Have you ever observed a female
15 under the age of 18 at Jeffrey Epstein's home
16 that was not a friend, a child -- one of your
17 friend's children?

18 A. Again, I can't testify to that
19 because I have no idea what you are talking
20 about.

21 Q. You have no idea what I'm talking
22 about in the sense you never observed a
23 female under the age of 18 at Jeffrey
24 Epstein's home that was not one of your
25 friend's children, is that correct?

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

4 A. How would I possibly know how
5 someone is when they are at his house. You
6 are asking me to do that. I cannot possibly
7 testify to that. As far as I'm concerned,
8 everyone who came to his house was an adult
9 professional person.

10 Q. Are you familiar with the police
11 report that was issued in respect to the
12 investigation in this matter?

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

15 Q. Are you familiar with the police
16 report that was used in this matter, the
17 investigation of Jeffrey Epstein, has been
18 produced as a document in this matter?

19 A. I have seen a police report.

20 (Maxwell Exhibit 1, police report,
21 marked for identification.)

22 Q. The police report that you have in
23 front of you, can you turn to page 28 of that
24 report, the numbers are on the top right-hand
25 corner.

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2 You will see some redactions in
3 this report, Ms. Maxwell, the redacted
4 information is redacted because it reveals
5 the name of a minor, someone who is under the
6 age of 18.

7 On page 28, in the third paragraph,
8 about halfway down, it says, Roberts stated
9 she performed the massage naked. At the
10 conclusion of this massage, Epstein paid
11 RobSON \$200 for the massage. He explained, I
12 know you are not comfortable put I will pay
13 you if you bring some girls. He told her the
14 younger the better. Robson stated once tried
15 to bring a 23 year old to Epstein and he
16 stated the female was too old.

17 Have you heard Mr. Epstein use the
18 phrase the younger the better?

19 A. I have no recollection of hearing
20 that.

21 Q. Have you used the phrase in talking
22 to Ms. Roberts and asking her to recruit
23 females for Mr. Epstein, the younger the
24 better?

25 MR. PAGLIUCA: Object to the form

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2 and foundation of the question.

3 A. First of all, can you break the
4 question apart.

5 Q. Have you used the phrase the
6 younger the better in speaking to Ms. Roberts
7 and asking her to recruit females for Jeffrey
8 Epstein?

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

11 Q. You can answer. It's yes or no.

12 A. No, that's absolutely not true, on
13 the second part of your question, I have not
14 asked Virginia to recruit females and the
15 first part of your question, if you can
16 repeat that again, the question you asked.

17 Q. Will you read back the question.

18 (Record read.)

19 A. I believe I answered the later part
20 of the question. The first part of the
21 question, it's impossible for me to recall
22 events that took place 16 years ago but it
23 doesn't sound like something I would say.

24 Q. On page 28, that same paragraph,
25 Roberts was asked how many girls in total she

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2 brought to Epstein. Robson stated that she
3 can remember, Robson stated that she brought
4 and, it's redacted there, and the victim in
5 this case.

6 Let me ask my question, I have a
7 question pending right now.

8 Are you testifying that you are
9 unaware of any underage, under the age of 18,
10 females coming to Jeffrey Epstein's home to
11 perform massages?

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

14 A. You need to straddle that question
15 in a different time period. When I was
16 there, at the time I was present, the people
17 that gave Jeffrey, men and women who gave
18 Jeffrey massages were adults over the age of
19 18.

20 Q. Never in your time at any of
21 Jeffrey Epstein's homes were you present when
22 a female under the age of 18 was there to
23 give Jeffrey Epstein a massage?

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

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2 A. First of all, as I said when I was
3 present --

4 Q. It is a yes or no.

5 A. No, it is not.

6 Q. You can answer the question in full
7 but please provide yes or no as an initial
8 matter.

9 A. I cannot answer yes or no, it's not
10 bounded by time. It's entirely possible I
11 could have been in a room or even in the
12 vicinity of Palm beach when somebody came and
13 I would not know. How would I know when
14 somebody was in the house. There is no way I
15 can know.

16 Q. Did you stay at Jeffrey Epstein's
17 home when you were in Palm Beach?

18 A. Most of the time.

19 Q. So how is it that you wouldn't know
20 if there was a female in the home under the
21 age of 18 if you were staying there?

22 A. Well, first of all, when I was
23 staying there, the house is actually quite
24 large and I have a very busy job and I had an
25 office with a door so the door would be shut

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2 and I would be working. I'm not responsible
3 for what Jeffrey does and I don't always pay
4 attention to what happens in the house. I'm
5 very busy.

6 Q. So you're testifying that you never
7 observed a female under the age of 18 at
8 Jeffrey Epstein's West Palm Beach home?

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

11 A. I already answered that question, I
12 believe.

13 Q. You didn't answer my question.

14 A. I did.

15 Q. Did you observe a female under the
16 age of 18 at Jeffrey Epstein's home in Palm
17 Beach?

18 A. Like I said, I work, I don't sit
19 there and watch people coming in and out of
20 the house. I cannot possibly tell you if I'm
21 in the home that somebody was there that I
22 did not see, I cannot comment on it, I have
23 no idea.

24 Q. Did you observe females at Jeffrey
25 Epstein's home that were laying out topless

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2 in the back of the home, in other words
3 without a shirt on?

4 A. So that's just another of
5 Virginia's lies. So let's be clear, at the
6 time when I was there and present, frequently
7 at the house, it was unusual to see people
8 without their clothes on.

9 Q. When you say unusual, did you
10 observe people without their clothes at
11 Jeffrey Epstein's home?

12 A. Can I answer. Sometimes people in
13 the privacy of a house and swimming pool, I
14 have seen people from time to time take their
15 top off. I have seen people from time to
16 time do that. Very unusual. Naked people
17 around the people at any frequent period of
18 time, I have never seen.

19 Q. Were they under the age of 18?

20 A. As I was saying, people when I was
21 in the house, were of adult age, if they were
22 children, friends of my family or friends
23 that were there, they may well have been
24 because I have nieces and nephews under the
25 age of 18, I cannot testify to anybody else

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2 -- just another one of Virginia's many
3 fictitious lies and stories to make this a
4 salacious event to get interest and press.
5 It's absolute rubbish.

6 Q. Were you in charge of hiring
7 individuals to provide massages for Jeffrey
8 Epstein?

9 A. My job included hiring many people.
10 There were six homes. As I sit here, I hired
11 assistants, I hired architects, I hired
12 decorators, I hired cooks, I hired cleaners,
13 I hired gardeners, I hired pool people, I
14 hired pilots, I hired all sorts of people.

15 In the course and a very small part
16 of my job was from from time to time to find
17 adult professional massage therapists for
18 Jeffrey.

19 Q. When you say adult professional
20 massage therapists, where did you find these
21 massage therapists?

22 A. From time to time I would visit
23 professional spas, I would receive a massage
24 and if the massage was good I would ask that
25 man or woman if they did home visits.

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2 Q. Did you ever hire a masseuse that
3 was under the age of 18?

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

6 Q. Did you?

7 A. Again, I don't hire massage
8 therapists, so that was not my job.

9 Q. You just said you did, you just
10 said you hired massage therapists for Jeffrey
11 Epstein, I'm asking if you hired a massage
12 therapist who was under the age of 18?

13 A. Let me correct myself. When I
14 meant hire, I didn't mean hire in the way you
15 are doing it. What I say is that I went to
16 spas and I met people and if they did home
17 visits, Jeffrey would then, in fact, hire
18 them. I'm not responsible for hiring
19 someone. And they were not full-time, so
20 it's not a correct characterization.

21 Q. Did you ever, your term is meet,
22 did you ever meet a person that was under the
23 age of 18 that you -- that Jeffrey then hired
24 as a masseuse?

25 MR. PAGLIUCA: Object to the form

1 G Maxwell - Confidential

2 and foundation.

3 A. First of all, Virginia Roberts who
4 you are referring to was a masseuse aged 17,
5 we all now know, so your story that you keep
6 pushing out to the press that she was a 15
7 year old -- you and I both know was a lie,
8 correct.

9 Q. You are not sentencing my question.

10 A. You and I both know that was a lie,
11 correct.

12 Q. You are not answering my question.
13 I'm asking you whether you ever met a female
14 under the age of 18 that Jeffrey then hired
15 as a masseuse?

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

18 A. The only person I can talk about
19 who clearly was a massage age 17, a masseuse,
20 was Virginia.

21 Q. Did you meet her and then introduce
22 her to Jeffrey?

23 A. I don't know. I already testified
24 I don't recall meeting her.

25 (Maxwell Exhibit 2, email, marked

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2 for identification.)

3 Q. So I'm showing you a document that
4 we have marked as Maxwell Exhibit 2. It's a
5 document you produced in this matter labeled
6 confidential GM 00109. It's dated Sunday
7 June 12, 2011. It's from Jeffrey Epstein to
8 you. If you can turn to page 4 -- sorry, can
9 you turn to the first page, the cover page
10 initially which is 00109. If you look under
11 the time stamp it says, June 12, 2011 at 4:12
12 p.m., it says [REDACTED]

13 Is that your email address?

14 A. It is.

15 Q. Under that it says, Thank you. I
16 have it now and I'm working on a letter, a
17 little, I will send the final version
18 tomorrow and what ever it is will be
19 factually accurate.

20 Do you see that on page 1?

21 A. I do.

22 Q. Then I would like you to turn to
23 page 4 please. The second paragraph down on
24 page 4, it states, After some thought, I
25 recall that I first met Ms. Roberts when she

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2 was working at a premier resort claiming to
3 be 18 years old and a professional masseuse?

4 MR. PAGLIUCA: What line are you
5 on, counsel.

6 MS. McCAWLEY: Second paragraph
7 down.

8 MR. PAGLIUCA: I got it.

9 Q. Is that a statement that you wrote?

10 A. It appears to be.

11 Q. So does that correct your testimony
12 that you did meet Ms. Roberts at Mar-a-Lago?

13 A. Again, this was written in, when
14 were you saying?

15 Q. 2011.

16 A. So by 2011, Ms. Roberts had already
17 perpetrated so many lies and stories it's
18 hard for me to accurately tell you today what
19 I remember back then. As I sit here today,
20 the testimony I give you today, I do not
21 recollect it.

22 Q. Do you have a reason to say that
23 this document that you wrote is incorrect?

24 A. It's in 2011, I can't possibly tell
25 you what I remember in 2011.

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2 Q. Are you questioning that this
3 document is incorrect, this document -- this
4 email that you wrote?

5 A. I wrote an email. I was trying to
6 be accurate, so who knows, with all the
7 rubbish that you guys have put out in the
8 press that I read, maybe in the moment I
9 wrote it a memory came to me that I don't
10 know, but as I sit here today and the
11 testimony I gave you today is I don't
12 recollect it.

13 Q. Does this refresh your recollection
14 that you recalled meeting Ms. Roberts at
15 Mar-a-Lago?

16 A. It does not.

17 Q. So your testimony today is that you
18 don't remember meeting Ms. Roberts at
19 Mar-a-Lago?

20 A. I do not.

21 I just want to clarify, when you
22 read so much stuff and so much rubbish that
23 comes out from Virginia Roberts, you don't
24 know what's up and down, at the time I wrote
25 this I believe I had a memory but as I sit

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2 here today I do not.

3 Q. Ms. Maxwell, when did you first
4 meet [REDACTED]?

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

7 A. I have no idea when I met her.

8 Q. Do you know how old she was when
9 you met her?

10 A. I have no idea how old she was when
11 I met her.

12 Q. Is it possible she was 13 years old
13 when you first met her?

14 MR. PAGLIUCA: Object to the form
15 and foundation.

16 A. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

21 Q. I understand [REDACTED]
22 [REDACTED]

23 I'm asking if [REDACTED] was 13
24 years old when you first met her?

25 A. I have no idea.

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2 Q. Was she under 18 when you first met
3 her?

4 A. I have no idea how old she was when
5 I first met her.

6 Q. Did she look like a child when you
7 first met her?

8 A. I don't remember what she looked
9 like at the time she was in the house.

10 Q. How many years have you known her?

11 A. I can only recall the last time I
12 saw her.

13 Q. When was the first time you met
14 her?

15 A. Again, I just told you, I don't
16 recall the first time I met her.

17 Q. Did [REDACTED] travel with you
18 on Jeffrey's planes?

19 A. I wouldn't remember if [REDACTED] was on
20 the plane or not.

21 Q. Did you ever have sex with [REDACTED]
22 [REDACTED]

23 A. No.

24 Q. Did you ever observe Jeffrey having
25 sex with [REDACTED]?

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2 A. No.

3 Q. Were you aware that Jeffrey was
4 having sexual contact with [REDACTED] when
5 she was 13 years old?

6 MR. PAGLIUCA: Object to the form
7 and foundation.

8 A. I would be very shocked and
9 surprised if that were true.

10 Q. Were you in the house when [REDACTED]
11 [REDACTED] was in the house in a private area
12 with Jeffrey Epstein?

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

15 A. Can you repeat the question.

16 Q. Were you ever in the Palm Beach
17 house when Jeffrey Epstein was in the house
18 with [REDACTED]?

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

21 A. I've already testified that I have
22 met her and that she was there [REDACTED]

23 [REDACTED] I don't understand what your
24 question is asking.

25 Q. So you have never seen [REDACTED]

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2 [REDACTED]

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

5 Q. Is that your testimony?

6 A. I already said I don't recall all
7 the times I've seen her and I have no memory
8 of that.

9 Q. Have you ever seen [REDACTED] in
10 the house with Jeffrey Epstein [REDACTED]
11 [REDACTED]

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

14 A. I just told you I don't recall
15 seeing [REDACTED]

16 Q. Were you ever involved in an orgy
17 with [REDACTED]?

18 A. No, absolutely not.

19 Q. Can you tell me, do you know an
20 individual by the name of Nadia Marcinkova?

21 A. I do.

22 Q. How did you meet Nadia Marcinkova?

23 A. At some point she was a friend of
24 Jeffrey's and I recall meeting her at some
25 point.

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2 Q. Did you hire her?

3 A. First of all, I don't hire girls
4 like that, so let's be clear, I already
5 testified to that, and I have no idea what
6 you are referring to.

7 Q. When you say girls like that, what
8 do you mean?

9 A. I hire people who are professional
10 at the house. You are asking if I hired
11 somebody to do what, I don't know what you
12 are talking about. I hired people to work in
13 the homes.

14 Q. What was Nadia Marcinkova doing?

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

17 A. I have no idea what Nadia
18 Marcinkova was doing. I didn't hire her and
19 I don't know what you are referring to.

20 Q. You met Nadia Marcinkova?

21 A. I testified I did.

22 Q. Did she work for Jeffrey Epstein?

23 A. I have no idea what she did.

24 Q. Have you flown on planes with Nadia
25 Marcinkova?

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2 A. I don't recollect. I don't know if
3 I did.

4 Q. How many times have you flown on
5 Jeffrey Epstein's planes?

6 A. Too many times.

7 Q. More than 300?

8 A. I really couldn't tell you how
9 many.

10 Q. More than 400?

11 A. Again, I said I cannot tell you how
12 many, a lot.

13 Q. How many times with Nadia
14 Marcinkova?

15 A. I already testified, I have no
16 idea.

17 Q. How old was Nadia Marcinkova when
18 she first became involved with Jeffrey?

19 A. I have no idea.

20 Q. Was she 14?

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

23 A. I have no idea.

24 Q. Did she look like a child the first
25 time you met her?

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

4 Q. Did she look like a child the first
5 time you met Nadia Marcinkova?

6 A. I don't know what you mean if she
7 looked like a child.

8 Q. Did she look like she was under the
9 age of 18?

10 A. No.

11 Q. Did she look like she was under the
12 age of 16?

13 A. I just testified -- first of all, I
14 couldn't tell you how old she was, she didn't
15 like like a child, leave it at that.

16 Q. Did you know that she was a child?

17 MR. PAGLIUCA: Object to the form
18 and foundation.

19 A. I just answered I did not know how
20 old she was and she looked like an adult.

21 Q. In the times that you traveled with
22 her on Jeffrey Epstein's planes, did you ever
23 ask her how old she was?

24 MR. PAGLIUCA: Object to the form
25 and foundation. Assumes facts not in

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2 evidence. The witness already testified
3 she doesn't remember.

4 Q. You can answer that question.

5 Did you ever ask her on the many
6 flights you were with her or the many times
7 you were with her at the house?

8 A. First of all, I don't know I was on
9 many flights with her, you are making stories
10 up again as usual. And secondly, if I was on
11 a flight with her, there would not be any
12 reason why I would ask her how old she was.

13 Q. You don't recollect having any
14 conversation with her about her age?

15 A. I already testified to that.

16 Q. Do you know what Nadia Marcinkova
17 was hired to do for Jeffrey?

18 A. I already testified I didn't know
19 she was hired and I don't know that she did
20 anything. I don't know how to answer that
21 question.

22 Q. Was Nadia Marcinkova at the house,
23 the Palm Beach house, when you were present
24 at that house?

25 MR. PAGLIUCA: Object to the

1 G Maxwell - Confidential

2 foundation.

3 A. I have no recollection of her being
4 at the house at the same time as me.

5 Q. When did you first meet Nadia
6 Marcinkova?

7 A. I already told you I don't recall.

8 Q. Do you recall anything about Nadia
9 Marcinkova?

10 A. That she was tall and blond.

11 Q. Do you recall Nadia Marcinkova
12 interacting with other females at the house?

13 A. No, I do not.

14 Q. Did you arrange to get a visa for
15 Nadia Marcinkova to come into this country?

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

18 A. Absolutely not.

19 Q. Did Jeffrey arrange for a visa for
20 Nadia Marcinkova?

21 MR. PAGLIUCA: You need to give me
22 a break so I can interpose an objection.

23 Object to the form and foundation.

24 Q. You can answer.

25 A. What was the question?

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2 Q. Did Jeffrey arrange for a visa for
3 Nadia Marcinkova?

4 A. I don't know what Jeffrey did. I
5 cannot testify what Jeffrey did.

6 Q. Was Nadia involved in sex with
7 Jeffrey and other girls?

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

10 Q. Girls under the age of 18?

11 MR. PAGLIUCA: Same objection.

12 A. I have no idea.

13 Q. Was Nadia involved with sex with
14 Jeffrey and girls over the age of 18?

15 MR. PAGLIUCA: Same objection.

16 A. I have no idea.

17 Q. Did Nadia recruit other girls for
18 sex with Jeffrey?

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

21 A. I have no idea.

22 Q. Do you still talk to Nadia?

23 A. No.

24 Q. Is she a pilot?

25 A. I have no idea.

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2 Q. Does she fly with Larry Veseski
3 (phonetic), one of Jeffrey's pilots?

4 A. I have no idea.

5 Q. Are you a pilot?

6 A. I am.

7 Q. Have you flown with Jeffrey Veseki?

8 A. I have.

9 Q. Have you flown with Nadia
10 Marcinkova?

11 A. What do you mean by flown?

12 Q. Have you been on planes with her?

13 A. I already testified I don't recall
14 having her on a plane with me.

15 Q. Do you know Sarah Kellen?

16 A. I do.

17 Q. When did you first meet her?

18 A. I don't recall exact dates.

19 Q. Did you meet her with the purpose
20 of hiring her to work for Jeffrey or having
21 Jeffrey hire her?

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

24 A. No.

25 Q. What was her relationship with

1 G Maxwell - Confidential

2 Jeffrey?

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

5 A. I don't know exactly the nature of
6 her relationship but she worked for him.

7 Q. What did she do?

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

10 A. At the time she when was with him I
11 believe she traveled with him and helped with
12 his travel arrangements.

13 Q. Did she bring girls to the house to
14 give massages to Jeffrey?

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

17 A. I don't know what Sarah did.

18 Q. So you never observed Sarah
19 bringing girls to the home to give massages
20 to Jeffrey?

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

23 A. I don't understand the question,
24 what did you mean bring?

25 Q. Did you ever observe Sarah

1 G Maxwell - Confidential

2 inviting, bringing, walking anyone into the
3 home to give a massage for Jeffrey?

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

6 A. I don't recollect anything like
7 that.

8 Q. Are you aware that Sarah Kellen was
9 a co-conspirator, named as a co-conspirator
10 in the case involving Jeffrey Epstein?

11 MR. PAGLIUCA: Object to the form
12 and foundation and also calls for a
13 legal conclusion.

14 MS. McCAWLEY I'm just asking if she
15 is aware of that.

16 A. I am aware.

17 Q. Who paid Sarah Kellen?

18 A. I have no idea.

19 Q. Did you ever arrange payment for
20 any of the employees at the home?

21 MR. PAGLIUCA: Object to the form.

22 A. What do you mean by arrange?

23 Q. Were you ever in charge or
24 responsible for paying individuals at the
25 home, that worked there?

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2 A. People had salaries and they were
3 paid by the office.

4 Q. Did you ever pay any individual,
5 did you ever hand an individual cash for work
6 they performed?

7 MR. PAGLIUCA: Object to the form.

8 A. Can you be more specific about what
9 you are asking me.

10 Q. Did you ever hand any individual
11 who was working at the home cash as payment
12 for something that they performed at the
13 home?

14 MR. PAGLIUCA: Object to the form.

15 A. To the best of my recollection
16 there were very few times where I would leave
17 some cash for people for work performed.

18 Q. And what type of work was being
19 performed where you would be doing that?

20 A. If I left cash for the pool guy, I
21 would have left potentially some cash for the
22 gardener, potentially for exercise
23 instructors and sometimes for massage
24 therapy.

25 Q. How much were the massage

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2 therapists paid?

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

5 A. They get paid between 100 and \$200.

6 Q. Did it vary based on what sexual
7 acts they performed?

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

10 A. No. It varied depending how much
11 time, some massage therapists charge more and
12 some charge less.

13 Q. Did the massage therapists that
14 were hired to come to the home perform sexual
15 acts for Jeffrey Epstein?

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

18 A. What are you asking me?

19 Q. I'm asking if the massage
20 therapists --

21 A. Are you asking me about underage
22 girls?

23 Q. I'm asking in general, did any of
24 the massage therapists in the home --

25 A. Are you asking if they were paid

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2 for sexual acts.

3 Q. I'm asking if they performed sexual
4 acts?

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

7 Q. Did any of the massage therapists
8 who were at the home perform sexual acts for
9 Jeffrey Epstein?

10 A. I don't know what you mean by
11 sexual acts.

12 Q. Did any of the massage therapists
13 who were working at the home perform sexual
14 acts, including touching the breasts,
15 touching the vaginal area, being touched
16 while Jeffrey is masturbating, having
17 intercourse, any of those things?

18 MR. PAGLIUCA: Objection. Form and
19 foundation.

20 To the extent any of this is asking
21 for to your knowledge any consensual sex
22 act that may or may not have involved
23 you, I'm instructing you not to answer
24 the question.

25 Q. I'm not asking about consensual sex

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2 acts. I'm asking whether any of the massage
3 therapists performed sexual acts for Mr.
4 Epstein, as I have just described?

5 A. I have never seen anybody have
6 sexual intercourse with with Jeffrey, ever.

7 Q. I'm not asking about sexual
8 intercourse. I'm asking about any sexual
9 act, touching of the breast -- did you ever
10 see -- can you read back the question?

11 (Record read.)

12 A. I'm not addressing any questions
13 about consensual adult sex. If you want to
14 talk about what the subject matter, which is
15 defamation and lying, Virginia Roberts, that
16 you and Virginia Roberts are participating in
17 perpetrating her lies, I'm happy to address
18 those. I never saw any inappropriate
19 underage activities with Jeffrey ever.

20 Q. I'm not asking about underage. I'm
21 asking about whether any of the masseuses
22 that were at the home perform sexual acts for
23 Jeffrey Epstein?

24 A. I have just answered the question.

25 Q. No, you haven't.

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2 A. I have.

3 Q. No, you haven't.

4 A. Yes, I have.

5 Q. You are refusing to answer the
6 question.

7 A. Let's move on.

8 Q. I'm in charge of the deposition. I
9 say when we move on and when we don't.

10 You are here to respond to my
11 questions. If you are refusing to answer the
12 court will bring you back for another
13 deposition to answer these questions.

14 Do you understand that?

15 MR. PAGLIUCA: You don't need to
16 threaten the witness.

17 MS. McCAWLEY: I'm not threatening
18 her. I'm making sure the record is
19 clear.

20 MR. PAGLIUCA: Certainly can you
21 apply to have someone come back and the
22 court may or may not have her come back
23 again.

24 Again, she is not answering
25 questions that relate to adult consent

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2 sex acts. Period. And that's the
3 instruction and we can take it up with
4 the court.

5 Q. Ms. Maxwell, are you aware of any
6 sexual acts with masseuses and Jeffrey
7 Epstein that were nonconsensual?

8 A. No.

9 Q. How do you know that?

10 A. All the time that I have been in
11 the house I have never seen, heard, nor
12 witnessed, nor have reported to me that any
13 activities took place, that people were in
14 distress, either reported to me by the staff
15 or anyone else. I base my answer based on
16 that.

17 Q. Are you familiar with a person by
18 the name of Annie Farmer?

19 A. I am.

20 Q. Has Annie Farmer given a statement
21 to police about you performing sexual acts on
22 her?

23 A. I have not heard that.

24 Q. Has Annie Farmer given a statement
25 to police about Jeffrey Epstein performing

1 G Maxwell - Confidential

2 sexual acts on her?

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

5 A. I have not heard that.

6 Q. How do you know Annie Farmer?

7 A. Annie Farmer had a sister and her
8 sister introduced Annie Farmer, I believe, to
9 Jeffrey.

10 Q. Was Annie Farmer under the age of
11 18?

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

14 A. I don't recall how old Annie Farmer
15 was.

16 Q. Did she tell police that Jeffrey
17 Epstein assaulted her sexually?

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

20 A. I never heard that.

21 Q. Did Sarah Kellen recruit or bring
22 girls to the home that were under the age of
23 18?

24 MR. PAGLIUCA: Object to the form
25 and foundation and I think this has been

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2 asked and answered already.

3 Q. You can answer the question.

4 A. I have no idea what Sarah Kellen
5 did.

6 Q. You never observed Sarah Kellen
7 with girls under the age of 18 at Jeffrey's
8 home?

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

11 A. The answer is no, I have no idea.

12 Q. Do you know Glenn Dubin?

13 A. I do.

14 Q. What is your relationship with
15 Glenn Dubin?

16 MR. PAGLIUCA: Object to the form.

17 A. What do you mean what is my
18 relationship.

19 Q. Are you friendly with him, how do
20 you know him?

21 A. He is the husband of Eva Dubin.

22 Q. Is Eva Dubin one of your friends?

23 A. Yes.

24 Q. Did you ever send Virginia to
25 Glenn's condo at the Breakers to give him a

1 G Maxwell - Confidential

2 message?

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

5 A. No.

6 Q. Did you ever instruct Virginia
7 Roberts to have sex with Glenn?

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

10 A. I have never instructed Virginia to
11 have sex with anybody ever.

12 Q. How old was Eva Anderson when she
13 met Jeffrey?

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

16 A. I have no idea.

17 Q. What's she under the age of 18?

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

20 A. I just testified I have idea how
21 old she was.

22 Q. You testified she was your friend.
23 You don't know how old she was when she met
24 Jeffrey?

25 A. That happened sometime in the '70s,

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2 how would I know, or '80s. I have no idea.

3 Can you testify to what your friends did 30

4 years ago?

5 Q. You don't ask the questions here,

6 Ms. Maxwell.

7 What about Johanna Sjoberg, when

8 did you first meet Johanna?

9 A. I don't recall the exact date.

10 Q. Did you hire Johanna?

11 A. I don't hire people, she came to

12 work at the house to answer phones.

13 Q. Where did you meet her?

14 A. I just testified, I don't recall

15 exactly when I met her.

16 Q. Was one of your job

17 responsibilities to interview people that

18 would be then hired by Jeffrey?

19 A. That was one of my

20 responsibilities.

21 Q. Do you recall interviewing Johanna?

22 A. I don't recall the exact interview,

23 no.

24 Q. Do you know what tasks Johanna was

25 hired to performance?

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2 A. She was tasked to answer
3 telephones.

4 Q. Did you ever ask her to rub
5 Jeffrey's feet?

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

8 A. I believe that I have read that,
9 but I don't have any memory of it.

10 Q. Did you ever tell Johanna that she
11 would get extra money if she provided Jeffrey
12 massages?

13 A. I was always happy to give career
14 advice to people and I think that becoming
15 somebody in the healthcare profession, either
16 exercise instructor or nutritionist or
17 professional massage therapist is an
18 excellent job opportunity. Hourly wages are
19 around 7, 8, \$9 and as a professional
20 healthcare provider you can earn somewhere
21 between as we have established 100 to \$200
22 and to be able to travel and have a job that
23 pays that is a wonderful job opportunity. So
24 in the context of advising people for
25 opportunities for work, it is possible that I

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2 would have said that she should explore that
3 as an option.

4 Q. Did you tell her she would get
5 extra money if she massaged Jeffrey?

6 A. I'm just saying, I cannot recall
7 the exact conversation. I give career advice
8 and I have done that.

9 Q. Did you ever have Johanna massage
10 you?

11 A. I did.

12 Q. How many times?

13 A. I don't recall how many times.

14 Q. Was there sex involved?

15 A. No.

16 Q. Did you ever instruct Johanna to
17 massage Glenn Dubin?

18 A. I don't believe -- I have no
19 recollection of it.

20 Q. Did you ever have sexual contact
21 with Johanna?

22 MR. PAGLIUCA: Object to the form
23 and foundation. You need to give me an
24 opportunity to get in between the
25 questions.

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2 Anything that involves consensual
3 sex on your part, I'm instructing you
4 not to answer.

5 Q. Did you ever have sexual contact
6 with Johanna?

7 A. Again, she is an adult --

8 Q. I'm asking you, did you ever have
9 sexual contact with Johanna?

10 A. I've just been instructed not to
11 answer.

12 Q. On what basis?

13 A. You have to ask my lawyer.

14 Q. Did you ever have sexual contact
15 with Johanna that was not consensual on
16 Johanna's part?

17 MR. PAGLIUCA: You can answer
18 nonconsensual.

19 A. I've never had nonconsensual sex
20 with anybody.

21 Q. Not Annie Farmer?

22 MR. PAGLIUCA: Objection.

23 A. I just testified I never had
24 nonconsensual sex with anybody ever, at any
25 time, at anyplace, at any time, with anybody.

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2 Q. So if Johanna were to testify that
3 she did not consent to a sexual act that you
4 participated in --

5 A. I just told you I have never ever
6 under any circumstances with anybody, at any
7 time, in anyplace, in any form had
8 nonconsensual relations with anybody.

9 Q. Did you introduce Johanna to Prince
10 Andrew?

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

13 A. I've, again, read that Johanna
14 claimed that she met or that she said she met
15 Prince Andrew. I don't know if I was the one
16 who made the introduction or not.

17 Q. Do you know a female by the name of
18 Emmy Taylor?

19 A. I do.

20 Q. How do you know her?

21 A. Emmy was my assistant.

22 Q. So she worked for you?

23 A. Yes.

24 Q. Did you hire her?

25 A. Again, Jeffrey hired people.

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2 Q. Did you have sex with her?

3 MR. PAGLIUCA: This is the same
4 instruction about consensual or
5 nonconsensual.

6 Q. Was Emmy under the age of 18 when
7 you hired her?

8 A. No. I didn't hire her, as I said,
9 Jeffrey did.

10 Q. Did Emmy ever have sex with
11 Jeffrey?

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

14 A. How would I know what somebody else
15 did.

16 Q. You weren't involved in the sex
17 between Jeffrey, Emmy and yourself?

18 A. We already --

19 Q. Were you involved with sex between
20 Jeffrey, Emmy and yourself?

21 MR. PAGLIUCA: Everyone is talking
22 over each other. You heard the
23 question.

24 Again, you you know what the
25 instruction is. If there is any

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2 consensual issue involved, I instruct
3 you not to answer.

4 A. Moving on.

5 Q. So you are refusing to answer that
6 question?

7 A. I've been instructed by my lawyer.

8 Q. Did you ever have sex with Jeffrey,
9 Emmy, Virginia and yourself when Virginia was
10 underage?

11 A. Absolutely not.

12 MR. PAGLIUCA: We've been going for
13 about an hour. I would like to take a
14 five-minute break, please.

15 MS. McCAWLEY: I'm almost done.

16 MR. PAGLIUCA: You are not going to
17 allow a break.

18 MS. McCAWLEY: As soon as I get
19 through my line of questioning, which is
20 perfectly appropriate.

21 Q. Did Emmy Taylor travel with you and
22 Jeffrey to Europe?

23 A. I'm sure she did.

24 Q. What is she doing today?

25 A. I have no idea.

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2 Q. Do you speak to her regularly now,
3 do you speak to her?

4 A. No.

5 Q. Do you know where she lives?

6 A. No.

7 Q. Do you know what country she lives
8 in?

9 A. No.

10 Q. Where is the last place you knew
11 that she lived?

12 A. Last place I knew for sure was in
13 Los Angeles.

14 Q. When did she stop working for you?

15 A. 2001, 2002.

16 Q. What tasks did she performance for
17 you?

18 A. She helped me with moving in and
19 out of houses, construction, she was a
20 general help, she helped with buying things
21 that needed to be purchased, if I needed her
22 to stand in for me during meetings, it was a
23 very wide ranging job.

24 Q. Did she ever bring females to
25 perform massages for Jeffrey?

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

4 A. What are you asking me?

5 Q. Did Emmy, was it ever Emmy's
6 responsibility to bring females to the house
7 for the purposes of massaging Jeffrey?

8 A. Emmy's job was to help me with the
9 houses and work in homes. It was not her job
10 to whatever you just said, bring masseuses.

11 Q. Did she do that?

12 A. I have no recollection. I have no
13 idea.

14 Q. Did you pay Emmy or did Jeffrey pay
15 her?

16 A. Jeffrey.

17 Q. Do you recall how much she was
18 paid?

19 A. I do not.

20 MS. McCAWLEY: I think we can take
21 a break now.

22 THE VIDEOGRAPHER: It's 10:02 and
23 we are off the record.

24 (Recess.)

25 THE VIDEOGRAPHER: It's now 10:18.

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2 We are back on the record and starting
3 disk No. 2.

4 Q. Ms. Maxwell, I asked you about
5 Virginia Roberts earlier.

6 Can you describe what Virginia
7 Roberts' duties were when she was with Mr.
8 Epstein?

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

11 A. I believe that Virginia was a
12 masseuse.

13 Q. Was Virginia required to dress up
14 in any way for massages?

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

17 A. I have no idea.

18 Q. Did you provide Virginia with
19 outfits to wear for certain massages?

20 A. I have no idea what you are talking
21 about.

22 Q. For example, did you ever provide
23 Virginia with a school girl outfit to wear
24 for a massage?

25 A. I have no idea what you are talking

1 G Maxwell - Confidential

2 about.

3 Q. So you didn't provide her with
4 that?

5 A. As I just testified, I have no idea
6 what you are talking about.

7 Q. I was trying to interpret whether
8 you didn't understand what a school girl
9 outfit was or you are saying that didn't
10 happen?

11 A. I clearly know what a school girl
12 outfit is. I have no recollection of
13 providing anybody with a school girl outfit.

14 Q. Did you have a set of outfits used
15 by the massage therapists that would include
16 things like a school girl outfit or a black
17 patent leather outfit or anything of that
18 nature?

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

21 A. That would be just another one of
22 Virginia's lies.

23 Q. You didn't have anything like that?

24 A. I did not.

25 Q. Did you have a basket of sex toys

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2 that you kept in the Palm Beach house?

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

5 A. First of all what do you mean.

6 Q. A laundry basket that contained sex
7 toys in it?

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

10 A. Can you ask the question again?

11 Q. Did you have a laundry basket that
12 contained sex toys in it, in the Palm Beach
13 House?

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

16 Q. Did you have a laundry basket of
17 sex toys in the Palm Beach house?

18 MR. PAGLIUCA: Same objection.

19 Q. You can answer.

20 A. I don't recollect anything about a
21 laundry basket of sex toys.

22 Q. Do you recollect having sex toys at
23 the Palm Beach house?

24 A. You have to define what are you
25 talking about.

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2 Q. A sex toy meaning a vibrator of
3 some kind, sometimes they are called dildos,
4 of that nature, anything like that?

5 A. I don't recollect anything that
6 would formally be a dildo, anything like
7 that.

8 Q. How would you describe sex toys?

9 A. I wouldn't describe sex toys.

10 Q. Did you have anything that was of
11 an electronic nature that would be used
12 during sex?

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

15 A. I have no idea what you are
16 referring to.

17 (Maxwell Exhibit 3, transcript,
18 marked for identification.)

19 Q. Ms. Maxwell, I will show you what
20 we are marking as Maxwell Exhibit 3.

21 If you look at the cover you will
22 see it's a deposition transcript of Juan
23 Alessi, do you know who Juan Alessi is?

24 A. I do.

25 Q. Who is he?

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2 A. He was somebody who Jeffrey hired
3 who worked at the house in Palm Beach.

4 Q. I would like to have you turn to
5 page, it should be page 76 of the actual
6 transcript?

7 MR. PAGLIUCA: We have two
8 transcripts.

9 Q. The mini version I think it is
10 there.

11 A. I don't have page 76.

12 Q. So in the miniscript portion here,
13 the beginning, there should be a page that
14 looks like this, it's got a 76 at the top in
15 the small square. Are you finding that, it's
16 not too far back, I don't believe, it says
17 page 19 the the bottom.

18 A. Okay.

19 Q. It's a miniscript like this. It
20 has four squares?

21 MS. MENNINGER: 109 or 19.

22 MS. McCAWLEY: 19.

23 MR. PAGLIUCA: The Bates label is
24 000109.

25 MS. McCAWLEY: Exactly.

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2 Q. I will direct your attention to
3 page 76 in the deposition of Juan Alessi and
4 it says, Would you describe for me what kinds
5 of vibrators you found, question mark. The
6 answer is, I'm not familiar, not too familiar
7 with the names. They were big dildos, what
8 they call big rubber things like that,
9 indicating.

10 A. I can't find where you are looking.

11 Q. Page 76, right here.

12 A. I need to be able to read this. I
13 will not be answering anything I have not
14 read. You can read it out and then I will
15 read it.

16 Q. Where was I. And I used to go and
17 put on my gloves and pick them up and put
18 them in the sink, rinse it off and put it in
19 Ms. Maxwell's -- Ms. Maxwell had in her
20 closet -- she had like a laundry basket, one
21 of those laundry baskets that you put laundry
22 in, she had full of these toys and that was
23 -- that was me professionally leaving the
24 room ready for the bed when they come back to
25 the room again.

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2 Does that refresh your recollection
3 that you had a laundry basket full of sex
4 toys?

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

7 A. First I have to read this.

8 Q. Sure.

9 MS. McCAWLEY: I will stop the
10 clock while the witness is reading.

11 MR. PAGLIUCA: No.

12 MS. McCAWLEY: Yes, if she is going
13 to read the whole document, I will stop
14 the clock.

15 MR. PAGLIUCA: If you give her
16 documents to refresh her recollection,
17 we are on the clock here.

18 MS. McCAWLEY: Then we will take it
19 up with the judge.

20 MR. PAGLIUCA: Read whatever you
21 need to answer the question.

22 MS. McCAWLEY: I'm going to set the
23 document aside and I'm just go to ask
24 you a question, independent of the
25 document.

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2 Q. Do you recall having a basket full
3 of sex toys?

4 A. I already told you I did not.

5 Q. We were talking a moment ago about
6 Ms. Roberts and her position as a masseuse,
7 do you know what she was paid for working as
8 a masseuse for Jeffrey Epstein?

9 A. I do not.

10 Q. Did you ever pay her?

11 A. I don't ever recall paying her.

12 Q. Do you know what happened during
13 the massage appointments with Jeffrey Epstein
14 and Virginia Roberts?

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

17 A. No.

18 Q. Were you ever present to view a
19 massage between Jeffrey Epstein and Virginia
20 Roberts?

21 A. I don't recollect ever seeing
22 Virginia and Jeffrey in a massage situation.

23 Q. Do you ever recollect seeing them
24 in a sexual situation?

25 A. I never saw them in a sexual

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2 situation.

3 Q. Did you ever participate in sex
4 with Virginia Roberts and Jeffrey Epstein?

5 A. I never ever at any single time at
6 any point ever at all participated in
7 anything with Virginia and Jeffrey. And for
8 the record, she is an absolute total liar and
9 you all know she lied on multiple things and
10 that is just one other disgusting thing she
11 added.

12 Q. Did you help her obtain an
13 apartment in Palm Beach to live in?

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

16 Q. Was that part of your
17 responsibilities for Jeffrey?

18 A. First of all, I didn't know she had
19 an apartment in Palm Beach. I only learned
20 that from the many times you guys have gone
21 to the press to sell stories, so no.

22 Q. Did you help her get a cell phone,
23 was that one of your responsibilities for
24 Jeffrey, to get her is a cell phone as part
25 of her masseuse obligations?

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

4 A. I don't know what that means,
5 masseuse obligation, I don't know what you
6 are referring to. Would you like to ask the
7 question properly?

8 Q. I think it was proper. I will ask
9 it again.

10 Did you ever assist in getting
11 Virginia Roberts a cell phone to use during
12 the time that she worked for Jeffrey Epstein?

13 A. I have no recollection of doing
14 anything of that nature.

15 Q. Did you ever tell Virginia that you
16 wanted her to have a cell phone so that she
17 could be on call regularly?

18 A. I have no recollection of that
19 conversation.

20 Q. How often would Virginia come over
21 to the house in Palm Beach to give massages?

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

24 A. Ask the question again, please.

25 Q. How often did Virginia Roberts come

1 G Maxwell - Confidential

2 over to the house in Palm Beach to give
3 massages?

4 A. It's important to understand that I
5 wasn't with Jeffrey all the time. In fact, I
6 was only in the house less than half the
7 time, so I cannot testify to when I wasn't in
8 the house how often she came when I wasn't
9 there.

10 What I can say is that I barely
11 would remember her, if not for all of this
12 rubbish, I probably wouldn't remember her at
13 all, except she did come from time to time
14 but I don't recollect her coming as often as
15 she portrayed herself.

16 Q. How many times a day on an average
17 day would Jeffrey Epstein get a massage?

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

20 A. When I was at the house and when I
21 was there with him, he received a massage, on
22 average, about once a day.

23 Q. Just once?

24 A. Yes.

25 Q. Were there days when he received

1 G Maxwell - Confidential

2 four or five?

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

5 A. When I was present at the house, I
6 never saw something like that.

7 Q. Do you know if Virginia was
8 required to be on call at all times to come
9 to the house if Jeffrey wanted her there?

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

12 A. I have no idea of the arrangements
13 that Virginia made with Jeffrey.

14 Q. When Virginia was in New York,
15 would Virginia sleep at Jeffrey's mansion in
16 New York?

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

19 A. I don't recollect her being in New
20 York and I have no idea where she slept.

21 Q. You don't ever remember seeing
22 Virginia Roberts in New York?

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

25 A. I would barely recollect her at

1 G Maxwell - Confidential

2 all, except for this story.

3 Q. Do you recall Virginia Roberts
4 calling you because she was having a medical
5 crisis and you and Jeffrey taking her to the
6 hospital?

7 A. I have heard this absurd story and
8 if any part of it were true I would remember
9 that. I do not.

10 Q. You don't remember taking her to
11 the hospital?

12 A. It's not that I don't remember it,
13 it didn't happen.

14 Q. How do you know it didn't happen?

15 A. That's the sort of memory you would
16 recall.

17 Q. Do you recall, you said you don't
18 remember her being at the New York mansion.
19 When you were in New York would you stay at
20 the New York mansion with Jeffrey?

21 A. I stayed from time to time.

22 Q. Do you recall Virginia being at the
23 New York mansion when Prince Andrew came to
24 visit?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. Like I told you, I don't recall her
4 being at the house at all.

5 Q. How many homes does Jeffrey have?

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

8 A. When I was working for him, I think
9 he had six maybe.

10 Q. Would Virginia stay with him in
11 those homes?

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

14 A. I can only testify for when I was
15 present with him and I cannot say what she
16 did when I wasn't present with him.

17 Q. When you were present, would
18 Virginia stay in the homes with him?

19 A. I don't recall her staying in the
20 houses.

21 Q. Did you train Virginia on how to
22 recruit other girls for massages?

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

25 A. No.

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2 Q. Did you train Virginia on how to
3 recruit other girls to perform sexual
4 massages?

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

7 A. No. And it's absurd and her entire
8 story is one giant tissue of lies and
9 furthermore, she herself has -- if she says
10 that, you have to ask her about what she did.

11 Q. Does Jeffrey like to have his
12 nipples pinched during sexual encounters?

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

15 A. I'm not referring to any advice on
16 my counsel. I'm not talking about any adult
17 sexual things when I was with him.

18 Q. When Jeffrey would have a massage,
19 would he request that the masseuse pinch his
20 nipples while he was having a massage?

21 A. I'm not talking about anything with
22 consensual adult situation.

23 Q. What about with underage --

24 A. I am not aware of anything.

25 Q. You are not aware of Jeffrey

1 G Maxwell - Confidential

2 Epstein ever having sex with an underage
3 minor and asking them to pinch his nipples?

4 A. I am not.

5 Q. So I'm going to direct you to, I
6 believe it's Maxwell Exhibit 1, the police
7 report.

8 Are you aware that over 30 under
9 age minors gave testimony to police that they
10 were engaged in sexual acts during,
11 quote-unquote, massages.

12 MR. PAGLIUCA: The witness needs to
13 find Exhibit 1. Exhibit 1 -- if you can
14 hand me that please.

15 Q. So now with respect to the police
16 report, are you aware that over 30 underage
17 girls, meaning under the age of 18 gave
18 reports to police that they were assaulted
19 sexually by Jeffrey Epstein during massages?

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

22 A. I read the police report. That's
23 all I can testify to.

24 Q. Are you aware of what is in the
25 police report? Are you aware that there were

1 G Maxwell - Confidential

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 Q. How about 2004?

3 A. I was present for his mother's --
4 his mother died in 2004 so I was there for
5 his mother's death and the funeral and I was
6 at the house maybe a handful of days, again.

7 Q. I would like to direct you to, you
8 have it pulled together now, it's page 39,
9 Bates stamped Giuffre 00040?

10 A. Can you repeat that, please.

11 Q. Sure. 00040.

12 A. Yes.

13 Q. At the top of that document, about
14 three lines down, you see the redacted
15 portions where there is black so it blacks
16 out the name.

17 A. I see black redacted portions.

18 Q. That's a black redaction of the
19 name of the minor and there is -- I will
20 represent for the record that's what it is.
21 You can contest that but I'm not asking about
22 the name of the minor.

23 Five lines down, it says, She was
24 just 16 years of age.

25 Do you see that?

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2 A. I have to read that, if you want me
3 to testify to some things.

4 Q. I'm asking if you see where it
5 says, She was just 16 years old.

6 A. No, I have to read it.

7 Q. It's five line downs on the first
8 paragraph.

9 A. I do see that.

10 Q. Then the next paragraph down, it
11 says, this is the next full paragraph, it
12 says, Epstein entered the room, introduced
13 himself, Epstein lay on the table and told
14 her to get comfortable, blank could not
15 remember if he was naked or if he entered the
16 room with a towel. Blank stated she provided
17 the massage wearing her panties. She
18 continued rubbing his thighs and feet. Blank
19 advised he turned over on his back and
20 continued to rub his legs with oil. Epstein
21 touched her breast and began to masturbate.
22 I asked if she knew what circumcised and
23 uncircumcised meant. She stated circumcised
24 is when the penis had no foreskin.

25 Then jumping down to the next

1 G Maxwell - Confidential
2 paragraph, it says, Blank became upset,
3 crying hysterically and stated she was paid
4 and also instructed to have sex with Epstein
5 and Nadia Marcinkova by Epstein.

6 Do you see that there?

7 A. I do.

8 Q. Are you aware that there were
9 underage minors in the Palm Beach house that
10 were required to give sexual massages to
11 Jeffrey Epstein?

12 MR. PAGLIUCA: Objection to the
13 form and foundation. This has been
14 asked and answered already. Now you are
15 just reading a document.

16 MS. McCAWLEY: I am allowed to take
17 this deposition.

18 A. I already testified --

19 Q. Are you aware there were underage
20 girls, 30 of them, in this police report that
21 were assaulted by Jeffrey Epstein in the Palm
22 Beach house during the time you are working
23 there?

24 A. I am aware that Virginia has
25 lied repeatedly --

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2 Q. I'm not asking about Virginia. I'm
3 asking if you are aware that there were over
4 30 underage girls who gave reports to police
5 officers during the time you worked for
6 Jeffrey Epstein. Are you aware of that?

7 MR. PAGLIUCA: Counsel, what is
8 your factual basis for asserting there
9 are 30 underaged people who gave
10 reports?

11 MS. McCAWLEY: I don't have to
12 answer that.

13 MR. PAGLIUCA: Are you representing
14 as an officer of the court that you have
15 personal knowledge that there are 30
16 people referenced in these police
17 reports?

18 MS. McCAWLEY: That's my
19 understanding, that there are 30 girls.

20 MR. PAGLIUCA: How is that your
21 understanding if these are redacted
22 reports?

23 MS. McCAWLEY: By reading through
24 the reports.

25 MR. PAGLIUCA: So you have personal

1 G Maxwell - Confidential

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

1 G Maxwell - Confidential

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

1 G Maxwell - Confidential

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. In your responsibilities in working
3 for Jeffrey, would you book massages for him
4 on any given day so that he would have a
5 massage scheduled? Would you take a call for
6 example and book a massage for him?

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

9 Q. You can answer.

10 A. Typically, that was not my
11 responsibility. He would either book the
12 massage himself or one of his other
13 assistants would do that.

14 Q. From time to time you had to do
15 that?

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

18 A. Like I said, typically it was
19 somebody else's responsibility.

20 Q. If you were unable to book a girl
21 for a massage on a given day, would that mean
22 that you were responsible for giving him a
23 sexual massage?

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

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2 not to answer any questions about any of
3 your consensual adult sexual activity.

4 Q. So you are not going to answer that
5 question?

6 A. You just heard my counsel.

7 Q. Have you ever said to anybody that
8 recruiting other girls to perform sexual
9 massages for Jeffrey Epstein takes the
10 pressure off you?

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

13 A. Repeat the question and break it
14 out.

15 Q. Have you ever said to anybody that
16 you recruit girls --

17 A. Stop right there. I never
18 recruited girls, let's stop there. Now
19 breakdown the question.

20 Q. Have you ever said to anybody --

21 A. By girls, we are talking about
22 underage people -- you said girls, are you
23 talking about underage -- we are not talking
24 about consensual acts -- this is a defamation
25 suit.

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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 testify to actual language.

3 Q. So you won't testify to anything
4 I'm asking you 17 years ago about a statement
5 you made. How do you know it's 17 years ago?

6 A. We are talking about a time in
7 2000, right?

8 Q. Have you ever said that to anybody?

9 A. I'm 54 years old so you are asking
10 me in my entire life, what words are you
11 asking me in my entire life?

12 Q. Your entire life is limited by the
13 time you were with Jeffrey, this is the
14 question.

15 A. Let's time limit the question you
16 are asking me.

17 Q. So from, let's say, I think you
18 said you started with him in 1992, is that
19 correct, and finished with him in 2009.

20 So from 1992 to 2009 have you ever
21 said to anybody that you recruit other and we
22 will start with girls to take the pressure
23 off you to have sex with Jeffrey?

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

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2 A. First of all I resent and despise
3 the world recruit. Would you like to define
4 what you mean by recruit and by girls, you
5 mean underage people. I never had to do
6 anything with underage people. So why don't
7 you reask the question in a way that I am
8 able to answer it.

9 Q. I'm asking if you ever said that to
10 anybody. So if you don't understand the word
11 recruit and you never used that word then the
12 answer to that question would be no.

13 A. I have no memory as I sit here
14 today having used that word.

15 Q. Did you ever meet an underage girl
16 in London to introduce her to Jeffrey to
17 provide him with a massage?

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

20 A. Run that past me one more time.

21 Q. Did you ever meet an underage girl
22 in London to introduce her to Jeffrey to
23 perform a massage?

24 MR. PAGLIUCA: Same objection.

25 A. Are you asking me if I met anybody

1 G Maxwell - Confidential

2 that was underage in London specifically to
3 provide a massage to Jeffrey, is that your
4 question?

5 Q. Yes.

6 A. No.

7 Q. Do you know who Alexander Dixon is?

8 A. I don't recall her right now.

9 Q. Do you know if -- strike that.

10 During the time that you were
11 working for Jeffrey, did you ever observe any
12 foreign females, so in other words, not from
13 the United States, that were brought to
14 Jeffrey's home to perform massages?

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

17 A. Females, what age are we talking?

18 Q. Any age.

19 A. Can you repeat the question?

20 Q. During the time you were working
21 for Jeffrey, did you ever observe any foreign
22 females of any age that were at Jeffrey's
23 home to perform a massage?

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

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2 A. Are you asking me if any foreigner,
3 not an American person, gave Jeffrey a
4 massage?

5 Q. Yes.

6 A. Well, as I sit here today, I can't
7 think of anyone who is foreign. Certainly --
8 I just can't think of anybody right this
9 second.

10 Q. How about any foreign girls who
11 were under the age of 18?

12 A. I already testified to not knowing
13 anything about underage girls.

14 Q. Were there foreign girls who were
15 brought to Jeffrey's home by Jean Luc Brunel
16 for the purposes of providing massages?

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

19 A. I am not aware of Jean Luc bringing
20 girls. I have not no idea what you are
21 talking about.

22 Q. You have never been around foreign
23 girls who are under the age of 18 at
24 Jeffrey's homes?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I already testified about not
4 knowing about underage girls.

5 Q. Did you provide any assistance with
6 obtaining visas for foreign girls that were
7 under the age of 18?

8 A. I've never participated in helping
9 people of any age to get visas.

10 Q. Did Jeffrey, was it Jeffrey's
11 preference to start a massage with sex?

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

14 A. I think you should ask that
15 question of Jeffrey.

16 Q. Do you know?

17 A. I don't believe that was his
18 preference. I think -- you have to
19 understand, a massage -- perhaps you are not
20 really familiar with what massage is.

21 Q. I am, I don't need a lecture on
22 massage.

23 A. I think you do.

24 MR. PAGLIUCA: No question pending.

25 She will ask you another question now.

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2 A. Massage is for health benefits.

3 Q. When did you first meet Jeffrey?

4 A. Some point in 1991.

5 Q. And did Jeffrey know your father?

6 A. No.

7 Q. How were you introduced to Jeffrey?

8 A. Some friend introduced us.

9 Q. Can you describe your relationship
10 back in 1991, was it friendship or was it
11 girlfriend relationship or was it a work
12 relationship, what was your relationship in
13 1991?

14 A. It was just friendly.

15 Q. Then I believe you testified you
16 began working for him in 1992, is that
17 correct?

18 A. Yes.

19 Q. In 1992 I know you gave me the
20 description of the work that you were
21 performing for him, how much was he paying
22 you, do you remember?

23 A. I don't recall.

24 Q. Do you know for example in 2001 how
25 much he was paying you?

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2 A. I don't recall.

3 Q. Did it change over the years or did
4 the payment remain the same?

5 A. I believe over the course of time
6 it increased a little bit.

7 Q. Was that the -- was that payment
8 the payment that -- was the payment made with
9 respect to the jobs, the work you were
10 performing for Jeffrey, was that your sole
11 income at that time?

12 MR. PAGLIUCA: I object to the
13 form. I'm also going to instruct you
14 not to answer about sources of -- your
15 personal sources of income outside of
16 Mr. Epstein at all.

17 MS. McCAWLEY: What's the basis for
18 that?

19 MR. PAGLIUCA: It's confidential,
20 it's not part of this lawsuit.

21 MS. McCAWLEY: We have a protective
22 order and it is part of this lawsuit
23 with respect to our damage claims.

24 MR. PAGLIUCA: It's not and, in
25 fact, you are not entitled to ask

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2 financial information of a defendant in
3 this kind of case, in a defamation case
4 unless and until there is a finding that
5 you are entitled to punitive damages.
6 That is clear in New York case law, both
7 state and Federal.

8 MS. McCAWLEY: We disagree on that
9 point and we will come back to that.

10 Q. From the source of payment from the
11 source of Jeffrey, from your work, can you
12 give me a range on that, do you know was it
13 over \$100,000?

14 A. I just testified I don't recall.

15 Q. You don't don't know if it was
16 \$500,000?

17 A. It was less than that.

18 Q. Somewhere between 100 and 500,
19 would that be fair to say?

20 A. I believe it was between 100 and
21 \$200,000.

22 Q. Did Jeffrey during the time that
23 you were working for him purchase a town home
24 for you?

25 A. The subject of the townhouse is, I

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2 worked for it and I had a loan, we did loans.

3 Q. So a loan through Jeffrey?

4 A. I don't recall the exact
5 transaction.

6 Q. Did he purchase for you a
7 helicopter during the time you were working
8 for him?

9 A. It was his helicopter.

10 Q. When did you obtain your pilot
11 license?

12 A. I believe it was '98 or '99.

13 Q. Was that for both airplanes and
14 helicopters or just helicopters?

15 A. Just helicopters.

16 Q. Have you ever flown President
17 Clinton on your helicopter?

18 A. That is another one of Virginia's
19 lies.

20 Q. The question is have you ever done
21 that?

22 A. I have never flown President
23 Clinton at any time ever, in any helicopter,
24 in any place, any time, in any state, in any
25 country, at any time anywhere.

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2 Q. Have you ever had dinner with
3 President Clinton at Jeffrey's home, at any
4 of Jeffrey's homes?

5 A. No, I don't believe so.

6 Q. Have you traveled on Jeffrey's
7 planes with President Clinton?

8 A. Yes, I have.

9 Q. Would that have been in 2002?

10 A. It's very hard for me to recollect
11 exact dates but that sounds about right.

12 Q. Was that during the time that
13 Virginia was working for Jeffrey?

14 A. I don't know that Virginia ever did
15 work for Jeffrey. I don't exactly know if
16 she testified to her so-called duties, we
17 know she is a serial liar so I can't testify
18 to what she did or didn't do. So I object to
19 that characterization of her. So repeat the
20 question, please.

21 Q. Can you read the question back?

22 (Record read.)

23 Q. You can answer the question.

24 A. What was the question again?

25 Q. When you were traveling on the

1 G Maxwell - Confidential
2 plane with President Clinton, was that during
3 the time, it was 2002, that you were on a
4 flight with Clinton, was that during the time
5 Virginia was working for Jeffrey?

6 MR. PAGLIUCA: Object to the form.
7 Misstates the witness' answer and if you
8 can answer the question, you can answer
9 it.

10 A. Well, like I said, I don't recall
11 exactly when I flew with him. I don't recall
12 when Virginia, we know what Virginia claims
13 when she left, so I can't answer the
14 question. I have no idea.

15 Q. Do you know Prince Andrew?

16 A. I do.

17 Q. How long have you known him?

18 A. A very long time.

19 Q. Since you were a child?

20 A. I really -- it's so long, it's
21 really a long time ago. I just don't recall.

22 Q. Do you remember how you first met
23 him?

24 A. No, I do not.

25 Q. Did you introduce him to Jeffrey?

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2 A. That would be another of Virginia's
3 lies and the lies you perpetrate. I never
4 introduced Prince Andrew to Jeffrey Epstein
5 at any time ever, so just add that the to
6 long list of lies.

7 Q. Did Jeffrey know Prince Andrew?

8 A. Clearly he knew him. I think we
9 have that answer but how -- yeah.

10 Q. Do you know how Jeffery met Prince
11 Andrew?

12 A. I do not know Jeffrey met Prince
13 Andrew. What I do know is that I did not
14 introduce them. That is one of the many
15 lies. Are we tallying all the lies?

16 Q. Do you know when Jeffrey met Prince
17 Andrew?

18 A. I do not know when Jeffrey met
19 Prince Andrew.

20 Q. Did you ever introduce Prince
21 Andrew to any girls under the age of 18 who
22 were not friends of yours children?

23 A. I have not introduced Prince Andrew
24 to anyone that I am aware of other than
25 friends of mine who have kids under that age

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2 that he may have met socially through me.

3 Q. Did you ever introduce Prince
4 Andrew 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 Prince
12 Andrew 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. Is that Prince Andrew in the
6 picture as well?

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

1 G Maxwell - Confidential

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 Prince Andrew, 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 Club Tramp with Prince Andrew, Jeffrey
13 Epstein and yourself and Virginia Roberts?

14 A. I would just like to state for the
15 record that Prince Andrew is a very famous
16 person, I know you are aware because you like
17 to use him so often in your press stories --
18 please let me finish. Were he at Tramp, at
19 any time, that would be reported by the
20 press. 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 Prince Andrew?

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2 A. No, I don't.

3 Q. Where in your town home -- we will
4 come back to that.

5 Do you have guest bedrooms in your
6 town home in London?

7 A. I do.

8 Q. How many?

9 A. Two.

10 Q. Did Prince Andrew ever visit
11 Jeffrey and you in New York?

12 A. Yes.

13 Q. Do you remember him visiting you
14 and Jeffrey in New York in the spring of
15 2001?

16 A. Again, I can't testify to any
17 specific dates.

18 Q. So you don't have a recollection of
19 that?

20 A. I have a recollection -- you've
21 asked me if I have a recollection of being in
22 New York but if you are asking for a date, I
23 cannot confirm that date.

24 Q. Do you remember Prince Andrew being
25 present in New York for a party where Johanna

1 G Maxwell - Confidential

2 Sjoberg was also present?

3 A. I don't recollect.

4 Q. Do you recall ever giving Prince
5 Andrew a gift of a puppet that was in the
6 same -- that looked like him?

7 A. I never gave him a gift of a
8 puppet.

9 Q. Did Jeffrey ever give him a gift of
10 a puppet?

11 A. No, not that I am aware of.

12 Q. Have you ever given him any gifts?

13 MR. PAGLIUCA: Objection,
14 foundation.

15 A. I know Andrew --

16 Q. Have you ever given him any gifts
17 that you remember when he came to Jeffrey's
18 home in New York?

19 A. I don't recall giving him any gifts
20 in New York.

21 (Maxwell Exhibit 5, picture, marked
22 for identification.)

23 Q. I think I directed you to page
24 0034.

25 Is that a picture that was taken at

1 G Maxwell - Confidential

2 your London town home?

3 A. I have no idea what this picture
4 was taken. I know what she purports it to be
5 but I'm not going to say that I do.

6 Q. Do the surroundings look like your
7 London town home?

8 A. They are familiar.

9 Q. Do you know who took this picture?

10 A. I do not.

11 Q. Did Jeffrey Epstein take the
12 picture?

13 A. I just testified I don't know who
14 took the picture.

15 Q. So you don't know if Jeffery
16 Epstein took the picture?

17 A. When I tell you I don't know who
18 took the picture, it doesn't mean him -- I
19 don't know who took the picture. You can
20 come up with 50 names, I still do not know
21 who took the picture.

22 Q. Did you observe Prince Andrew go
23 into a room with Virginia alone in your town
24 home?

25 A. I cannot recall. As I have said,

1 G Maxwell - Confidential

2 no.

3 Q. Did Prince Andrew ever tell you
4 that he had sex with Virginia Roberts?

5 A. He did not.

6 Q. Did Jeffrey Epstein ever tell you
7 that Prince Andrew had sex with Virginia
8 Roberts?

9 A. He did not.

10 Q. Did Prince Andrew ever visit -- let
11 me back up for a moment. We talked about
12 Jeffrey's homes, did Jeffrey have a home in
13 the U.S. Virgin islands called Little St.
14 James?

15 A. Yes.

16 Q. Did Prince Andrew ever visit that
17 island -- are you aware of Prince Andrew ever
18 visiting Jeffrey's island?

19 A. I am aware of that, yes.

20 Q. Do you know how many times he
21 visited?

22 A. I do not.

23 Q. Do you know if he visited when
24 Virginia was on the island?

25 A. I do not.

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2 Q. Were you present on the island when
3 Prince Andrew visited?

4 A. Yes.

5 Q. How many times?

6 A. I can only remember once.

7 Q. Were there any girls under the age
8 of 18 on the island during that one visit
9 that you remember that were not family or
10 friends of or daughters of your friends?

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

13 A. There were no girls on the island
14 at all. No girls, no women, other than the
15 staff who work at the house. Girls meaning,
16 I assume you are asking underage, but there
17 was nobody female outside of the cooks and
18 the cleaners.

19 Q. Did you, as part of your duties in
20 working for Jeffrey, ever arrange for
21 Virginia to have sex with John Luc Brunel?

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

24 A. Just for the record, I have never
25 at any time, at anyplace, in any moment ever

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2 asked Virginia Roberts or whatever she is
3 called now to have sex with anybody.

4 Q. Did you ever provide Virginia
5 Roberts with an outfit, an outfit of a sexual
6 nature to wear for Les Wexner?

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

9 A. I think we addressed the outfit
10 issue.

11 Q. I am asking you if you ever
12 provided her with an outfit of a sexual
13 nature to wear for Les Wexner?

14 A. Categorically no. You did get
15 that, I said categorically no

16 Q. Don't worry I'm paying attention.

17 A. You seemed very distracted in that
18 moment.

19 (Maxwell Exhibit 6, flight logs,
20 marked for identification.)

21 A. Do you mind if I take a break for
22 the bathroom.

23 Q. It's 11:08 and we are going to go
24 off the record now.

25 THE VIDEOGRAPHER: It's now 11:09.

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2 We are off the record.

3 (Recess.)

4 THE VIDEOGRAPHER: It's now 11:26,
5 we are back on the record and starting
6 disk No. 3.

7 Q. Ms. Maxwell, I think I handed you
8 right before the break, did I hand you the
9 flight logs, they look like this. Did I mark
10 those yet, I thought I did.

11 A. I don't believe I have it.

12 Q. These admittedly are a little
13 difficult to read so what I'm going to
14 provide you with to assist is I have a chart
15 that has the airport codes, because it will
16 have, for example, just for the record
17 reflects that the first page of document
18 [REDACTED] it will have a code in the from line
19 that says PBI, for example, to TEB so I a
20 chart that matches up, just in case you don't
21 understand what those letters mean, PBI
22 meaning Palm Beach, TEB meaning Teterboro,
23 which is New Jersey, but others are more
24 difficult but just for you to be able to
25 understand the logs, I will provide you with

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2 that.

3 MR. PAGLIUCA: So we are clear, if
4 the witness has personal knowledge of
5 what these are that's fine but I don't
6 know what these are and I don't expect
7 the witness to accept the representation
8 that they are what they are.

9 MS. McCAWLEY: If she can testify
10 to what city it is, she can state that
11 on the record.

12 MR. PAGLIUCA: If she knows what it
13 is, she knows what it is, we are not
14 putting any affirmatively on the record
15 until you ask your questions.

16 Q. So I'm going to ask you and I think
17 we flagged a few of the pages which may
18 direct us a little bit easier but I will do
19 it by Bates number which is at the bottom of
20 the document kind of at the side.

21 The first I will direct your
22 attention to is [REDACTED]

23 A. Does it have a tab?

24 Q. It should. Let me make sure.

25 A. Yes it does.

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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, ET
18 for Emmy Taylor 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

1 G Maxwell - Confidential
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 Emmy Taylor 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 ET 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 MR. PAGLIUCA: Objection to the
3 form and foundation.

4 A. GM can stand for any level, it
5 could be Georgina, George.

6 Q. Are there any people that flew with
7 Jeffrey Epstein that had the initials GM?

8 A. I don't know.

9 Q. Do you recall flying with Jeffrey
10 Epstein on his plane over 300 times during
11 the period of 1999 to 2005?

12 A. I cannot testify to how many times
13 I was on his plane because that would just be
14 impossible.

15 Q. You were on his plane regularly,
16 would you say?

17 A. I already testified I was on his
18 plane regularly.

19 Q. Is it your testimony and I'm
20 referring now to the line that we were just
21 talking about that you were not on the flight
22 from Palm Beach to Teterboro that lists JE,
23 GM, ET and Virginia?

24 A. I am not testifying to that. I am
25 just saying that you cannot be sure that is

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2 me.

3 Q. So as you sit here today, you don't
4 believe you flew on that plane?

5 A. I'm not saying that. I'm just
6 saying you cannot be sure that's me.

7 Q. Do you have reason to doubt that
8 when it says GM on these flight logs that
9 that represents you?

10 A. I cannot testify to that. I'm just
11 saying it may not be me.

12 Q. In looking at the flight logs and
13 look up, let's move up a couple of lines. If
14 you start at the top, you are going to see
15 JE, [REDACTED], then JE, AP, [REDACTED],
16 JE, AP [REDACTED], JE, GM, JE, GM, JE, GM,
17 Ricardo Loretta, reposition, JE, GM, JE, GM
18 ET Kelly Spamm, JE, GM, Kelly Spamm, Tom
19 Pritzer, female, Marham Air Force
20 repositioning. JE, GM, ET, Kelly Spamm, JE,
21 GM, ET, Kelly Spamm, JE, GM, ET, Virginia,
22 JE, GM, AP, Virginia, repositioning and then
23 a certification.

24 So is it your testimony in looking
25 at that that you do not believe that the GM

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2 represents you?

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

5 A. I'm not saying that. I'm just
6 saying that you cannot -- I can't sit here
7 and tell you for sure GM is me and I cannot
8 testify remembering being on a flight at that
9 time.

10 Q. You don't remember being on any of
11 these flights with the initial GM?

12 A. I remember being on many flights.
13 I cannot testify that is a flight I am on.

14 Q. Let's go to the next page which is
15 going to be [REDACTED] I want you to look at
16 line -- so the date is at the top, so it's
17 [REDACTED] and if you go down, you will see
18 a line that says the [REDACTED] and if you scroll
19 over you will see PBI to TIST, if you look at
20 the airport codes, TIST is going to be
21 representative for the U.S. Virgin Islands
22 and then you will see the list on the plane
23 JE, GM, ET and Virginia Roberts.

24 Do you recall flying from Palm
25 Beach to the U.S. Virgin Islands with

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2 Jeffrey, yourself, Emmy Taylor and Virginia
3 Roberts?

4 MR. PAGLIUCA: I object to the form
5 and just so the record is clear, we
6 don't agree with whatever your
7 characterizations are. The document
8 speaks for itself and she can answer
9 based on whatever her personal knowledge
10 is.

11 MS. McCAWLEY: I understand.

12 Q. Do you recall flying with those
13 individuals from Palm Beach to the U.S.
14 Virgin Islands?

15 A. I have no recollection of any
16 individual flight you are pointing out here.
17 You are talking about 2001, how many years
18 ago is that?

19 Q. I'm asking the questions.

20 A. I'm not being difficult. I'm just
21 asking, it's like 14, 15 years ago, it's
22 impossible, I'm sorry.

23 Q. So your testimony is you don't
24 recall flying on that flight with Virginia
25 Roberts?

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2 A. I cannot testify to that flight.

3 Q. Let's look at the next flight which
4 is on the [REDACTED] from the Virgin Islands back
5 to Palm Beach, JE, Jeffrey Epstein, Ghislaine
6 Maxwell, Emmy Taylor, Virginia Roberts, the
7 same individuals on the above flight.

8 A. It doesn't say my name, it has some
9 initials.

10 Q. I understand, the initials GM.

11 Do you recall flying on a plane, on
12 one of Jeffrey's planes from the Virgin
13 Islands to Palm Beach with Virginia Roberts?

14 A. I do not.

15 Q. Was there any other person that
16 flew with Jeffrey Epstein with frequency
17 during that time period in these logs that
18 have the initials GM?

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

21 A. I would have to look at all the
22 flight logs, I have no idea, I flew
23 frequently.

24 Q. Why don't you take a look at the
25 next three pages and see if that refreshes

1 G Maxwell - Confidential

2 your recollection.

3 MR. PAGLIUCA: You are talking
4 about [REDACTED]

5 MS. McCAWLEY: She can pick any
6 couple of pages, those have a lot of the
7 individuals on them so that is a good
8 sampling.

9 MR. PAGLIUCA: So pick any pages
10 you want.

11 Q. Does that refresh your recollection
12 at all as to whether GM represents you or
13 some other individual?

14 A. Again, I can't testify whether that
15 represents me or not, I don't see any other
16 GMs but you have to understand that even if
17 my name is on that record doesn't mean I was
18 on the flight.

19 Q. So are you contesting the accuracy
20 of the flight logs? In other words, you said
21 it doesn't represent you are on the flight so
22 is it your testimony just because a name is
23 listed doesn't mean they were actually on the
24 flight?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I can't testify to what -- these
4 are records that were produced by Dave Rogers
5 is on here, so these aren't federally
6 mandated records, so I can't testify to what
7 he produced.

8 Q. I would like you to turn to page,
9 at the bottom, the Bates number is [REDACTED]
10 And the month is [REDACTED].

11 A. Okay.

12 Q. If you go down to the number that
13 is [REDACTED] that would be [REDACTED] you're
14 going to see on that line an [REDACTED] which is a
15 [REDACTED] and then you
16 will see [REDACTED] which is going to be, I'm going
17 to pronounce it incorrectly, [REDACTED]
18 [REDACTED] I'm sure I'm not pronouncing that
19 correctly. Then you will see in the list,
20 you will see JE, GM, SK, President Clinton,
21 Doug Band, it looks like --

22 A. I believe it says male.

23 Q. Yes. Then [REDACTED] I
24 believe. Is that GM on this page
25 representative of you?

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2 A. Well, this would be a flight that I
3 would potentially remember with Bill Clinton
4 on it but I don't actually recall going to
5 Russia.

6 Q. Are those your initials, do you
7 recall being on the flight?

8 A. Those are my initials with
9 President Clinton, I don't recall this flight
10 either, but I would be more likely to if I
11 had a bit more time to study the timing of
12 this.

13 Q. Your testimony is you don't recall
14 flying with President Clinton from [REDACTED] to
15 [REDACTED]

16 A. I don't recall the [REDACTED] to [REDACTED]
17 flight. I have definitely flown with
18 President Clinton.

19 Q. On that same page you will see
20 beneath there, beneath 22 you will see the
21 indication, same as above, same as above,
22 same as above in the column that originally
23 had the initials.

24 A. Uh-huh.

25 Q. And the names.

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2 A. Uh-huh.

3 Q. Do you recall flying with President
4 Clinton from [REDACTED] to [REDACTED]

5 [REDACTED]

6 A. I do.

7 Q. So the GM that would be represented
8 in that column would be you?

9 A. I recall going to [REDACTED] with the
10 president so that is likely to be me.

11 Q. You were on Jeffrey's plane for
12 that trip?

13 A. I believe I was.

14 Q. Do you know who [REDACTED]
15 is?

16 A. I do not.

17 Q. I'm going back towards the front
18 which is going to be [REDACTED] please. And
19 you're going to see --

20 A. Hang on I'm not --

21 Q. Take your time.

22 A. Okay.

23 Q. You are going to see in the date
24 column, you will see [REDACTED] and then about
25 halfway down you will see [REDACTED] and

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2 then you will see the [REDACTED] which
3 is the column which is where I want you to
4 start looking at the log and there you're
5 going to see [REDACTED]

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

11 A. Okay.

12 Q. If you look at the column, if you
13 go back up to the top on the [REDACTED] if you look
14 at the column you will see JE, GM, ET,
15 Virginia Roberts and I believe it says [REDACTED]
16 [REDACTED] sorry I'm not reading that very
17 well.

18 Do you recall flying from, if you
19 see the dates, the [REDACTED]
20 [REDACTED] Do you recall a trip that went from
21 the United States to [REDACTED] and to the places
22 I just mentioned where Virginia Roberts was
23 on the plane with you?

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

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2 A. I already testified that I don't
3 recall Virginia on any of these flights.

4 Q. I would like to mark, as Maxwell 7,
5 I will put it at the top?

6 (Maxwell Exhibit 7, photo, marked
7 for identification.)

8 MR. PAGLIUCA: Has this document
9 been produced in discovery?

10 MS. McCAWLEY: Yes.

11 MR. PAGLIUCA: Do you have a Bates
12 number?

13 MS. McCAWLEY: This one doesn't.

14 Q. I'm going to ask you --

15 MR. PAGLIUCA: I don't recall
16 seeing this document so I would like to
17 see a Bates number document before we
18 ask questions about it.

19 MS. McCAWLEY: Can you go look for
20 it and I will continue. We will set
21 that aside until we get a Bates number.
22 You may want to leave that log up and
23 set it to the side and we will bounce
24 back to that.

25 Q. Do you recall -- I think earlier

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2 you said you visited Jeffrey's island, I
3 think they called it St. Jeffrey or St.
4 James, the U.S. Virgin Island home.

5 A. St. James.

6 Q. Do you recall whether President
7 Clinton was ever on that island?

8 A. Categorically, definitively,
9 absolutely, without a shadow of a doubt, when
10 I was present or any other time that I am
11 aware of, was President Clinton ever on that
12 island, I do not believe he went to that
13 island ever ever, that is an absolute
14 fabrication and an absolute flat out lie.

15 Q. Was President Clinton or former
16 President Clinton ever at any of Jeffrey
17 Epstein's homes when you present, other than
18 the island I know you said that did not
19 happen, the home in either New York or Palm
20 Beach or New Mexico?

21 A. I do not believe at any time
22 President Clinton was at any of Jeffrey's
23 homes, I have absolutely no knowledge or
24 otherwise that he was ever there.

25 Q. You don't recall having dinner with

1 G Maxwell - Confidential

2 him at any of those homes?

3 A. Again, Virginia is absolutely
4 totally lying. This is a subject of
5 defamation about Virginia and the lies she
6 has told and one of lies she told was that
7 President Clinton was on the island where I
8 was present. Absolutely 1000 percent that is
9 a flat out total fabrication and lie.

10 Q. You did fly on planes, Jeffrey
11 Epstein's planes with President Clinton, is
12 that correct?

13 A. I have flown, yes.

14 Q. Would it be fair to say that
15 President Clinton and Jeffrey are friends?

16 A. I wouldn't be able to characterize
17 it like that, no.

18 Q. Are they acquaintances?

19 A. I wouldn't categorize it.

20 Q. He just allowed him to use his
21 plane?

22 A. I couldn't categorize Jeffrey's
23 relationship.

24 Q. When you were on the plane with
25 Jeffrey and President Clinton, did you

1 G Maxwell - Confidential
2 observe Jeffrey and President Clinton
3 talking?

4 A. I'm sure they did.

5 Q. Did they seem friendly?

6 A. I don't recollect.

7 Q. Was Epstein one of the original
8 people that conceived the Clinton global
9 initiative?

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

12 Q. Do you know?

13 A. I don't have -- I don't know what
14 you are talking about.

15 Q. You don't know what I'm talking
16 about.

17 Did you ever, not at one of houses,
18 but did you ever eat dinner with President
19 Clinton and Jeffrey Epstein?

20 A. Are you just talking in general
21 anywhere.

22 Q. In general?

23 A. I believe on a plane of this nature
24 we would have had a meal.

25 Q. But not outside of the travel on

1 G Maxwell - Confidential

2 the flights?

3 A. I can't recollect having a meal
4 with them, but just so we are clear, the
5 allegations that Clinton had a meal on
6 Jeffrey's island is 100 percent false.

7 Q. But he may have had a meal on
8 Jeffrey's plane?

9 A. I'm sure he had a meal on Jeffrey's
10 plane.

11 Q. You do know how many times he flew
12 on Jeffrey's plane?

13 A. I don't.

14 Q. Do you know who Doug Band is?

15 A. I do.

16 Q. How do you know him?

17 A. He used to work or still works for
18 Bill Clinton.

19 Q. Did you ever have a relationship
20 with him?

21 A. We are talking about adult
22 consensual relationships, it's off the
23 record.

24 Q. I'm not asking what you did with
25 him, I'm asking if you ever had a

1 G Maxwell - Confidential

2 relationship with him?

3 MR. PAGLIUCA: If you understand
4 the term relationship, certainly you can
5 answer that.

6 A. Define relationship.

7 Q. Somebody that you would have spent
8 time together, either seeing them in a
9 romantic relationship or --

10 A. You need to be, what do you mean by
11 romantic. I was friends with Doug but you
12 are suggesting something more so I want to be
13 clear what you are actually asking me.

14 Q. You defined it. You said you were
15 friends with him. If that's what you were
16 that's all I need to know.

17 While you were on the trip with
18 President Clinton, do you recall where you
19 stayed at these locations, in other words,
20 would you leave the jet and stay overnight at
21 a hotel, do you have a recollection of this
22 trip?

23 A. I recollect the trip but if you're
24 asking me where we stayed, you can see it's a
25 very fast paced trip. It was very tiring and

1 G Maxwell - Confidential

2 I don't recollect where we stayed.

3 Q. Do you recollect if you stayed at
4 the same place President Clinton stayed? In
5 other words, if you left the plane to go a
6 hotel did you all go together is your
7 recollection?

8 A. I honestly don't recollect, no.

9 Q. Part of this trip we were just
10 talking about, there is a flight that goes to
11 Thailand, do you remember being in Thailand?

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

14 A. Are you asking me --

15 Q. On the President Clinton trip.

16 A. Are you referencing something?

17 Q. The part that, let me make sure
18 I've got it here. The entry that would be
19 the Thailand, would be the one -- let me make
20 sure I'm correct. I have you on the wrong
21 page, it's actually the page before. It's
22 going to be [REDACTED] And it's going to be the
23 entry on [REDACTED] starting on [REDACTED] and then
24 it goes down to where it has the same as
25 above, to [REDACTED] -- I'm saying

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2 [REDACTED]

3 MR. PAGLIUCA: That's what the
4 document says.

5 Q. I'm not representing the date but
6 there it is. So the last leg of that where
7 it says same as above has, the second to
8 last, I'm sorry on the [REDACTED]

9 [REDACTED]

10 Do you remember being in Thailand
11 with President Clinton?

12 A. I do.

13 Q. Do you remember what the purpose of
14 that trip was?

15 A. I don't.

16 Q. Do you know whether -- do you
17 recall, did you stay the night in Thailand?

18 A. I don't recall.

19 Q. Do you recall why you went to
20 Thailand?

21 A. I don't recall.

22 Q. Who is Andrea Mitrovich?

23 A. She I believe was a stewardess on
24 this flight.

25 Q. Did she perform any massages on the

1 G Maxwell - Confidential

2 flight?

3 A. I don't recollect any messages on
4 the flight.

5 Q. Do you know who [REDACTED] is?

6 A. It doesn't -- no I don't know who
7 that is, I can't recall.

8 Q. This is not in color, it's a black
9 and white but it has the Bates label on it.
10 Should I take the sticker off the one that
11 has -- I don't know if you want to swap it.

12 MR. PAGLIUCA: Let the record
13 reflect I am replacing this on the black
14 and white copy of this exhibit with

15 [REDACTED]

16 Q. So, we were talking earlier, we
17 were looking at the flight logs and we were
18 talking about a trip and let me just get you
19 back to the page. [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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2 Q. Can I direct your attention to the
3 picture, please.

4 A. Of course.

5 Q. Can you tell me who is in this
6 picture, who is pictured here, and for the
7 court reporter's benefit, can you go from the
8 left of the picture to the right of the
9 picture, to the extent you can identify the
10 individuals?

11 A. Sure. I cannot identify the person
12 on the left, I cannot identify the person
13 next left. I can identify Jeffrey Epstein.
14 I cannot identify the next person to his
15 right and the next person in the picture is
16 myself.

17 Q. Is the individual all the way to
18 the left at the beginning of the picture,
19 does that resemble Emmy Taylor. You might
20 want to look at the color version if that
21 helps you at all, I know it's not the marked
22 one. I don't if that's easier to see, they
23 are both dark.

24 A. That does not look like Emmy Taylor
25 at all.

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2 Q. Do you recall --

3 MR. PAGLIUCA: Let's mark this then
4 as deposition Exhibit 8 since we are
5 referring to it and then you can give us
6 copies as well.

7 MS. MENNINGER: It's different
8 because it has other people in this
9 color photo.

10 (Maxwell Exhibit 8, photo, marked
11 for identification.)

12 Q. Do you recall who took this
13 photograph?

14 A. I do not.

15 Q. Do you recall this photograph being
16 taken by Virginia?

17 A. First of all, I don't know where we
18 are.

19 Q. So you don't recognize the
20 building?

21 A. I don't recognize the building and
22 I don't recognize -- the only two people I
23 recognize in the picture are Jeffrey and
24 myself.

25 Q. Does this like look a picture of a

1 G Maxwell - Confidential

2 building that you would have seen when you
3 were on the trip in Europe?

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

6 A. I can't possibly answer that.

7 Q. Do you recall Virginia ever taking
8 pictures?

9 A. I barely recall Virginia, period.

10 Q. Do you recall her ever taking
11 pictures?

12 A. No, I don't.

13 Q. I'm going to direct your attention,
14 still within the flight logs to -- starting
15 on the next page from where you just were
16 which is going to be [REDACTED] And the date at
17 the top says [REDACTED] you will see [REDACTED] and I'm
18 directing your attention down towards the
19 middle to the bottom where you will see the
20 numbers [REDACTED]

21 A. Uh-huh.

22 Q. And we've got actually I'm going to
23 direct your attention to the one that starts

24 [REDACTED]

[REDACTED]

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2 and in the line, the remarks line you will
3 see JE, GM, AP, VR, BK, Marvin Minski and

4 [REDACTED]

5 MR. PAGLIUCA: Are you reading the
6 29th, is that what you're reading?

7 MS. McCAWLEY: I'm reading the
8 29th, yes.

9 Q. Below that you will see JE, GM, AP,
10 VR, [REDACTED] and Marvin
11 Minski.

12 Do you see that?

13 A. I do.

14 Q. Do you recall a trip from Teterboro
15 to Santa Fe and Santa Fe back to Palm Beach
16 with these individuals?

17 A. I don't.

18 Q. Do you recall being on a plane with
19 [REDACTED] and Virginia Roberts?

20 A. I don't.

21 Q. Do you recall ever witnessing any
22 sexual interaction on one of Jeffrey's planes
23 with any of these individuals?

24 A. I do not, absolutely not.

25 Q. Did Jeffrey have a fold out bed on

1 G Maxwell - Confidential

2 one of his planes?

3 A. There was a bed on one of his
4 planes that folded out, yes.

5 Q. Do you recall whether with respect
6 to this being in Santa Fe, do you recall
7 whether you were there for some form of a
8 party?

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

11 A. I don't recall the trip at all and
12 this looks like a total work trip, not a
13 party trip.

14 Q. What would be the difference
15 between a work trip and a party trip?

16 A. Just that I would be on trips for
17 work and I believe that this looks like, AP
18 looks like it's one of the -- probably one of
19 the designers and the time would meet with a
20 trip to decorate the house, just the timing
21 of it.

22 Q. So would Virginia be brought on
23 trips that were for the purpose of work and
24 decorating the house?

25 A. Like I said, I never worked with

1 G Maxwell - Confidential

2 her but you would have to ask Jeffrey what he
3 brought her on the trip for.

4 Q. But she would travel with him when
5 there was a work trip like this?

6 A. I can't -- I'm seeing that she is
7 on this flight but I have no idea what she is
8 doing, he invited her, it would not be my
9 job.

10 Q. What about [REDACTED], would she
11 regularly travel with Jeffrey on flights?

12 A. I have no idea, you would have to
13 look through the flight logs. I have no
14 idea.

15 Q. Your recollection is -- what is
16 your recollection, do you recollect [REDACTED]
17 traveling often on flights with Jeffrey?

18 A. Absolutely not. No, not at all. I
19 don't recollect her actually on the flight at
20 all.

21 Q. I think you can set that aside for
22 the moment.

23 (Maxwell Exhibit 9, message pad
24 pages, marked for identification.)

25 Q. We will mark as Exhibit 9 these

1 G Maxwell - Confidential

2 excerpts from -- we will identify what they
3 are but from the message pads.

4 Did you want to correct anything?

5 A. I want to make an addendum.

6 Would you mind rereading the last
7 question back to me?

8 (Record read.)

9 A. I also just want to say that at
10 this point I cannot recollect flying to
11 parties. Jeffrey went for work so -- was
12 this in Santa Fe, this flight as well.

13 Q. The flight we were looking at, yes
14 but it was to Santa Fe --

15 A. I don't recall going to any parties
16 in Santa Fe at any time but certainly flying
17 to Santa Fe for a party seems highly
18 improbable.

19 Q. So I'm going to direct your
20 attention to the document that I set before
21 you which is Bates number [REDACTED] and it
22 has different Bates numbers because it's a
23 smaller version of the larger production.
24 These are the pages I will be asking about.

25 In the time that you were working

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2 with Jeffrey in Palm Beach, do you recall a
3 process for taking, anybody at the house
4 taking messages when incoming phone calls
5 came in?

6 A. You are supposed to take a message
7 and receive the message and write the message
8 down. Who was the message was for, what time
9 it was taken and who took it and what the
10 message was, obviously.

11 Q. Does what's in front of you look
12 familiar with respect to the message pads
13 that you would have used at the house?

14 A. It is familiar.

15 Q. I'm going to direct your attention
16 to the second page of it?

17 MR. PAGLIUCA: These all have SAO
18 numbers on them or Bates ranges and I
19 don't see any of your Bates ranges on
20 these. I know you have produced message
21 pads but those have your Bates range
22 numbers on them and I'm wondering if
23 these are different documents.

24 MS. McCAWLEY: It's the same, just
25 ours have the Bates underneath them.

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2 These were produced as part of the rule
3 26 discovery. We can get the additional
4 Bates if you want.

5 Q. The one I'm asking about first is
6 the [REDACTED]. You can look at that and then
7 I will identify the Bates number referenced
8 in this case.

9 I want to direct your attention to
10 the top right-hand corner just so I have an
11 understanding of how these messages were
12 taken. So I see that it says at the top it
13 says in the for line it says Ms. Maxwell and
14 the date of 4/25/04 and then I see under the
15 M line it looks like Necole Hesse or
16 something like that, a phone number and a
17 message saying returning your call and on the
18 bottom it looks like Rushi.

19 Explain to me, is this -- does this
20 represent [REDACTED] taking down a message for you
21 from Ms. Hesse, is that how these work?

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

24 Q. My question is, I'm trying to
25 understand how the messages were taken.

1 G Maxwell - Confidential

2 Looking at this message pad, where it says
3 signed [REDACTED] can you tell me who [REDACTED] was?

4 A. I cannot.

5 Q. You do not know.

6 Typically when these messages were
7 taken in your practice when you were there,
8 would the individual who took the message
9 write their name on the message?

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

12 A. I don't recollect, you can ask who
13 wrote it so you can find out who it was.

14 Q. Do you know who Necole Hesse is?

15 A. I don't.

16 Q. I'm going to direct your
17 attention -- do we have a Bates number for
18 that?

19 MR. EDWARDS: [REDACTED]

20 Q. Giuffre [REDACTED] for that one.

21 I will direct your attention to the
22 first page which has the [REDACTED] on it.

23 A. Okay.

24 Q. Now at the top of that document, on
25 the right-hand side, the message that reads

1 G Maxwell - Confidential
2 for JE, date 1/02/03, message Caroline Casey
3 and then it's signed GM.

4 Is that your signature?

5 A. That's not my handwriting.

6 Q. Would other people take a message,
7 how did this process work, is there someone
8 else in the house with the initials GM?

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

11 A. I cannot answer that. It's not my
12 handwriting.

13 Q. I'm trying to understand how this
14 gets there. If you took a message and didn't
15 write it down, would someone else record that
16 message for you?

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

19 A. All I can tell you, this is not my
20 handwriting so I cannot -- I have no idea
21 what that is.

22 Q. Was the practice that, what was the
23 practice when someone answered the phone with
24 these message pads, what were they supposed
25 to do?

1 G Maxwell - Confidential

2 A. They were supposed to take a
3 message and the time and date and give the
4 message.

5 Q. Were they supposed to indicate who
6 took the message?

7 A. They were but it wasn't -- I don't
8 really recall the actual process. I can see
9 from here it looks like you were supposed to
10 but that's not my handwriting so I can't say
11 what that was.

12 Q. Do you know who Caroline Casey is?

13 A. No, I don't.

14 Q. Do you know whether Caroline Casey
15 was under the age of 18?

16 A. I just testified I couldn't
17 remember who she was so it would be difficult
18 to know how old she was.

19 Q. Do you know if she was coming to
20 the house to provide massages?

21 A. I don't remember who she is at all,
22 so no.

23 Q. And then I would like to direct
24 your attention to the message right
25 underneath it. Which says JE, [REDACTED], Amanda

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2 and has a phone number and the message says,
3 wants to know if she should bring her friend
4 [REDACTED] tonight.

5 What is that message referring to?

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

8 A. I can't possibly know.

9 Q. Did individuals at the house take
10 messages for underage girls to come over and
11 bring friends for the purpose of providing
12 massages?

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

15 A. How would I possibly know what you
16 are talking about.

17 Q. Did you record messages at the
18 house?

19 A. It's not my job.

20 Q. You did from time to time record
21 messages?

22 A. Hardly ever.

23 Q. But you did from time to time do
24 it?

25 A. I'm just saying I hardly ever took

1 G Maxwell - Confidential
2 messages, very, very, very, very
3 infrequently.

4 Q. Do you know if Amanda brought her
5 friend [REDACTED] over on that night?

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

8 A. One, I don't know what this message
9 is, I don't know if I was in Palm Beach, I
10 don't know who Amanda is, I don't know who
11 [REDACTED] is and I don't know what this message
12 is referring to.

13 Q. So on January 2nd of 2003, were you
14 in Palm Beach?

15 A. I don't know.

16 Q. Where would you have been other
17 than Palm Beach at the time?

18 A. I could have been anywhere.

19 Q. Where did you typically live?

20 A. What are you asking me?

21 Q. So for example, in 2003, where was
22 your primary residence, was it wherever
23 Jeffrey was living and staying or was it
24 independent of that?

25 A. What was the date again.

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2 Q. In 2003?

3 A. The end of 2003?

4 Q. January, the beginning.

5 A. I don't know, I could have been
6 anywhere, Jeffrey and I were leading almost
7 separate lives by then.

8 Q. If you were at the house that day,
9 did you recall seeing anybody by the name of

10

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

13 A. I don't know if I was at the house,
14 so I can't testify to that.

15 Q. Let's flip back to the next page,
16 the one we were on before the [REDACTED], the
17 message towards the bottom that says, for
18 Jeffrey, message of Ghislaine. And it says,
19 Would it be helpful to have and then redacted
20 come to Palm Beach today to stay here and
21 help train new staff with Ghislaine. Who
22 were you referring to in that message; do you
23 remember?

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

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2 Q. The question is, do you recall this
3 message?

4 A. I do not recall this message.

5 Q. Do you recall training a female
6 under the age of 18 at Jeffrey's home?

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

9 A. I never trained a female under the
10 age of 18 at Jeffrey's home.

11 Q. Did you ever say it would be
12 helpful to have a female under the age of 18
13 come to Palm Beach today to stay here and
14 help train new staff with Ghislaine?

15 A. I never asked anyone under the age
16 of 18 come to help train new staff.

17 Q. I'm going to flip to the next page
18 which is [REDACTED].

19 A. By the way, that is not my
20 handwriting and it's not dated and I couldn't
21 possibly tell you who that is.

22 Did you hear that?

23 Q. You got your testimony on the
24 record.

25 [REDACTED]

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2 A. Yes.

3 MR. EDWARDS: Giuffre [REDACTED]

4 Q. I'm going to direct your attention
5 to the top right-hand corner, for Mr.
6 Epstein, [REDACTED], message [REDACTED] a phone
7 number and called.

8 Do you know who [REDACTED] is?

9 A. I don't.

10 Q. Do you know that [REDACTED] was 15 at
11 the time she left this message?

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

14 A. I don't know who [REDACTED] is.

15 Q. And then I'm going to direct your
16 attention to the bottom left which is a
17 message JE message of Jean Luc and the
18 message says, He just did a good one, 18
19 years, she spoke to me and said I love
20 Jeffrey.

21 Was Jean Luc referring to sex with
22 an 18 year old in that message?

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

25 A. How could I know what Jean Luc is

1 G Maxwell - Confidential

2 referring to.

3 Q. Do you know if Jean Luc had sex
4 with an 18 year old that he referenced to
5 Jeffrey Epstein?

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

8 A. How could I possibly know.

9 Q. Did Jeffrey Epstein or Jean Luc
10 ever tell you that Jean Luc had sex with an
11 18 year old?

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

14 A. I have no idea what you are talking
15 about.

16 Q. Did they ever tell you that?

17 A. I have no recollection of ever
18 hearing such a ridiculous thing.

19 Q. I will turn to the next page which
20 is SAO 2841?

21 MS. MENNINGER: Do you have the
22 Bates number?

23 Q. The bottom right-hand corner, Mr.
24 Epstein, the date [REDACTED] Ms. Maxwell, it
25 says, [REDACTED] it says, quote, [REDACTED] is

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2 available on Tuesday, no one for tomorrow.

3 Is this a message you took?

4 A. It's not my handwriting and I don't
5 know who R is.

6 Q. So when it says Ms. Maxwell in the
7 line there, is that you calling for Mr.
8 Epstein?

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

11 A. I didn't write it, I don't know
12 when this message was taken. I don't even
13 know what it's referring to and I don't know
14 what my name is doing on that message pad.

15 Q. I know you said you only took them
16 a few times. Do you have a recollection of
17 taking messages of females who would call the
18 house to indicate whether or not they were
19 coming over?

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

22 A. Give me a date range.

23 Q. On 7/9/04.

24 A. How would I know if I'm in Palm
25 Beach, most likely not.

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2 Q. I'm asking if you have a
3 recollection of taking messages for girls who
4 would call the house --

5 A. Girls.

6 Q. Females, who would call the
7 house --

8 A. Over the age of 18.

9 Q. [REDACTED] is 15.

10 A. I don't know who [REDACTED] is, so I
11 can't testify anything to [REDACTED]

12 Q. Your name is on the message.

13 A. I didn't put it there and I don't
14 know what it's doing there.

15 Q. So your testimony is you didn't
16 take this message?

17 A. I obviously didn't take the
18 message, it's signed by somebody R, it's not
19 my handwriting. We don't know if I'm in Palm
20 Beach.

21 Q. Did you arrange for [REDACTED] to have
22 his friend [REDACTED] come over on Tuesday of
23 this week?

24 A. I don't know who [REDACTED] is so it
25 would be hard for me to arrange anything with

1 G Maxwell - Confidential

2 someone I don't know.

3 Q. Why is your name reflected on this
4 message pad?

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

7 A. I have no idea. You would have to
8 ask whoever took the message.

9 Q. Did you, in the course of your
10 work, regularly take messages for Jeffrey
11 Epstein?

12 A. I already testified I hardly ever
13 did.

14 Q. Would you, in the course of your
15 work, regularly set up appointments for
16 females to come over and give massages for
17 Jeffrey Epstein?

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

20 A. Can you specify, females, you mean
21 adults over the age of 18.

22 Q. Did you regularly set up for
23 Jeffery adults over the age of 18 to come for
24 massages?

25 A. I didn't regularly do that, no.

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2 Q. Would you take messages with
3 respect to females over the age of 18 to come
4 over for a massage?

5 A. I already testified I hardly ever
6 did take messages.

7 Q. But would you?

8 A. I already testified, I hardly
9 ever --

10 Q. I know hardly ever, but did you?

11 A. Over the course of time it is
12 possible I may have taken a couple, I have no
13 recollection. I hardly ever did and I did so
14 irregularly that it would hard for me to
15 pinpoint.

16 Q. Did you ever take a message for a
17 female under the age of 18 to come over for a
18 massage or for any other reason to be with
19 Jeffrey Epstein?

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

22 A. I hardly ever took a message. I
23 have absolutely no way of knowing, maybe one
24 of my friends' daughters called to say they
25 were coming to visit me. I have never taken

1 G Maxwell - Confidential
2 messages, I don't know about how I would
3 possibly know if somebody I spoke to, one or
4 two times I took a message is, how old they
5 would be but I have never taken a message
6 where I was aware of anything being under the
7 age of 18 and I probably took it so
8 infrequently, it would be impossible.

9 Q. Can you turn to [REDACTED] it
10 should be the next page.

11 A. Uh-huh.

12 Q. Do you see at the top, it says, for
13 Mr. J. 11/8/04 and then the name is
14 redacted. It says, I have a female for him.

15 Why would a minor be calling
16 Jeffrey to say they have a female for him?

17 Do you know?

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

20 A. First of all, I don't know that's a
21 minor, I don't know who took the message.

22 Q. I will represent to you these are
23 police reports and minor's names have to be
24 redacted for privacy purposes?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 Q. Do you know why a minor child would
4 be calling Jeffrey and leaving a message to
5 say, quote, I have a female for him?

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

8 A. I can't testify anything about this
9 message, I don't know anything about it.

10 Q. I'm going to direct your attention
11 to the next page [REDACTED] If you look at
12 the bottom left, you are going to see a
13 message for Jeffrey, from [REDACTED], it
14 says she doesn't have a number and left a
15 message that she called.

16 Do you know who [REDACTED] is?

17 A. I do not.

18 Q. Do you know that [REDACTED] was
19 13 at the time she placed this call to
20 Jeffrey?

21 A. I don't know who [REDACTED] is.

22 Q. Would Jeffrey regularly have 13
23 year olds call and leave messages?

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

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2 A. How would I possibly, these were
3 messages taken when I was not at the house
4 and I have no idea who they are nor how old
5 they are nor anything.

6 Q. How do you know you weren't at the
7 house on this day?

8 A. I was hardly at the house in 2005.

9 Q. So you could have been there, you
10 just don't know?

11 A. In the five days I might have been
12 there in 2005, I suppose it's possible but
13 it's unlikely.

14 MR. PAGLIUCA: Do you know why this
15 isn't redacted if you are representing
16 all the names of people who are underage
17 have been redacted from these records.

18 MS. McCAWLEY: I think it was -- my
19 assumption is it was a miss by the
20 police department.

21 Q. I will direct your attention to [REDACTED]
22 [REDACTED] so you will skip a page and go back,
23 it's the final page in the message pads and
24 you will see on the top left for Jeffrey, on
25 6/1/2005 from Jean Luc Brunel with a phone

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2 number. It says, quote, He has a teacher for
3 you to teach you how to speak Russian. She
4 is two times eight years old. Not blond.
5 Lessons are free and you can have your first
6 today if you call.

7 Do you know whether Jean Luc Brunel
8 sent a Russian girl that was 16 years old
9 over to Jeffrey Epstein's home?

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

12 A. I do not know.

13 Q. Did you ever observe a Russian girl
14 that was 16 years old come to Jeffrey
15 Epstein's home?

16 A. I am not aware of any 16 year old
17 Russian girl that I can recall in Jeffrey
18 Epstein's home.

19 Q. Do you know whether Jeffrey Epstein
20 had sex with a 16 year old Russian girl?

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

23 A. I do not know.

24 THE VIDEOGRAPHER: It's 12:25.

25 This will be the end of disk 3, we are

1 G Maxwell - Confidential

2 off the record.

3 (Recess.)

4 A F T E R N O O N S E S S I O N

5 (Time noted: 1:21 p.m.)

6 G H I S L A I N E M A X W E L L,

7 resumed and testified as follows:

8 EXAMINATION BY (Cont'd.)

9 MS. McCAWLEY:

10 THE VIDEOGRAPHER: It's now 1:21,
11 we're starting disk No. 4. We are back
12 on the record.

13 Q. Ms. Maxwell, before the break, we
14 were talking about and I think it's one of
15 the exhibits that's marked in front of you,
16 I'm not sure of the number, but the police
17 report that I showed you earlier today.

18 Now that you have knowledge of the
19 police report and the criminal investigation
20 with respect to Jeffrey Epstein, do you
21 believe that Jeffrey Epstein abused any minor
22 children?

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

25 A. Can you repeat the question please

1 G Maxwell - Confidential

2 and break it down so it's more
3 understandable.

4 Q. Now that you have the police report
5 that I showed you this morning that you had
6 an opportunity to look at.

7 A. You gave it to me, I did not look
8 at it.

9 Q. The questions that I asked you
10 about the police report -- you are aware
11 there is a police report?

12 A. I am aware there is a police
13 report.

14 Q. You are aware there was a criminal
15 investigation of Jeffrey Epstein?

16 A. I am aware that there was that.

17 Q. Now that you are aware of those two
18 things and having talked to Jeffrey Epstein,
19 do you believe Jeffrey Epstein sexually
20 abused minors?

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

23 A. Can you reask the second part of
24 that question please.

25 Q. Sure. The two documents we were

1 G Maxwell - Confidential
2 talking about, the document and the
3 investigation, you said you are aware of and
4 after having talked to Jeffrey Epstein, do
5 you believe Jeffrey Epstein sexually abused
6 minors?

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

9 A. What do you mean I talked to
10 Jeffrey, you need to break the question down
11 further.

12 Q. So you have the police report.

13 A. I do.

14 Q. And you are aware of the criminal
15 investigation?

16 A. I am.

17 Q. Let's take those two things. After
18 knowing those two things, do you believe that
19 Jeffrey Epstein abused minor children?

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

22 A. Can you explain what you mean by
23 the question actually.

24 Q. I think the question speaks for
25 itself. I will try again. I will say it one

1 G Maxwell - Confidential

2 more time because I want you to be able to
3 understand it.

4 Knowing that you have the police
5 report here and knowing about the criminal
6 investigation, do you believe that Jeffrey
7 Epstein sexually abused minors?

8 MR. PAGLIUCA: Same objection.

9 A. I know what you put in front of me
10 and I know what I read.

11 Q. I'm asking what you believe, do you
12 believe Jeffrey Epstein sexually abused
13 minors?

14 A. I can only tell you what I read and
15 what you showed me.

16 Q. I'm asking what you believe, from
17 your own belief, do you believe that Jeffrey
18 Epstein abused minors?

19 A. I can only go from what I know
20 personally and what I know personally about
21 what Virginia's lies talked about. She is
22 the only person I know that actually claimed
23 that. And I can say with certitude that
24 everything Virginia said was a lie.

25 Q. You are aware Jeffrey Epstein was

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2 sentenced for sexual abuse, are you aware of
3 that?

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

6 Q. Are you aware that Jeffrey Epstein
7 served time for sexual abuse of a minor?

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

10 A. I don't believe that's what he was
11 sentenced for, actually.

12 Q. So you don't know that Jeffrey
13 Epstein served time for sexually abusing a
14 minor?

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

17 A. I don't believe that's what he was
18 sentenced for.

19 Q. Do you know that Jeffrey Epstein
20 was convicted for procuring a minor for
21 prostitution?

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

24 A. I don't know exactly what he was
25 convicted of. I don't know that he was

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2 convicted. I know he spent time in jail.

3 Q. Do you know that he spent time in
4 jail related to an issue with a minor child?

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

7 A. I did not know that.

8 Q. What did you think he was spending
9 time in jail for?

10 A. I only know he went to jail for --
11 it was alleged that he hired -- had an
12 underage prostitute.

13 Q. So knowing that, do you believe
14 that Jeffrey Epstein sexually abused minors?

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

17 A. I can only tell you what he went to
18 jail for.

19 Q. I'm asking what you believe. I'm
20 not asking what he went to jail for. I'm
21 asking for your belief.

22 A. I cannot testify to what I believe.
23 I can only say what I have seen in the
24 reports and I know he went to jail.

25 Q. You can testify to what you

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2 believe. Do you believe --

3 A. I can only testify --

4 Q. Let me finish the question so the
5 record is clear.

6 Do you believe Jeffrey Epstein
7 sexually abused minors?

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

10 Q. You can answer.

11 A. I can only testify to what I know.
12 I know that Virginia is a liar and I know
13 what she testified is a lie. So I can only
14 testify to what I know to be a falsehood and
15 half those falsehoods are enormous and so I
16 can only categorically deny everything she
17 has said and that is the only thing I can
18 talk about because I have no knowledge of
19 anything else.

20 Q. I'm not asking about Virginia. I'm
21 asking whether you believe that Jeffrey
22 Epstein sexually abused minors?

23 A. Again, I repeat, I can only go on
24 what I know and what I know is a falsehood
25 based on what Virginia said.

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2 Q. Do you believe Jeffrey Epstein
3 sexually abused minors?

4 A. Again, I repeat, Virginia is a liar
5 and based on Virginia's stories, that is
6 what -- she lied and I can only then talk
7 about what you've showed me in the police
8 reports and I know he went to jail.

9 Q. Do you believe that Jeffrey Epstein
10 sexually abused minors? I'm asking about
11 your belief.

12 A. Again, I just repeat, I can only
13 go -- my belief is Virginia is a liar.

14 Q. What is that belief?

15 A. She is an absolute liar and
16 everything she said is a lie and therefore,
17 everything that stems from that is a lie.

18 Q. So do you believe that Jeffrey
19 Epstein sexually abused minors?

20 A. Again -- can we move on from here?

21 Q. No. You are going to answer the
22 question.

23 A. I have already.

24 Q. No, you haven't.

25 A. I have.

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2 Q. Do you believe Jeffrey Epstein
3 sexually abused minors?

4 A. Again, I repeat, the only person I
5 know who has talked about these things that I
6 have personal -- was personally present, was
7 Virginia and I can only talk to Virginia and
8 she is a liar.

9 Q. Setting aside Virginia. Take her
10 out of the picture. It's my question.

11 A. We are here today because of
12 Virginia and her lies because this is a
13 defamation suit.

14 Q. Setting aside Virginia, do you
15 believe Jeffrey Epstein sexually abused
16 minors?

17 A. I cannot set aside Virginia because
18 that's why we are here and this is the only
19 reason I am sitting here in this room and I
20 will not set her aside and I cannot comment
21 about anything else except her because she is
22 the only person I actually know about.

23 Q. Are you refusing to answer that
24 question?

25 A. I am not refusing the question. I

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2 can only testify about Virginia who is an
3 absolute total liar and you all know she is.
4 She lied about her age, you know she lied
5 about absolutely everything. So I can only
6 go on what I know as a liar and she is a
7 liar, an exaggerator, a fantasist and
8 absolutely true terrible person.

9 Q. I want you to listen very
10 carefully. I am asking you to set aside
11 Virginia.

12 A. I can't set aside Virginia.

13 Q. I am asking you to do that for
14 purposes of this question.

15 MR. PAGLIUCA: She doesn't have to.

16 MS. McCAWLEY: She can refuse to
17 answer the question.

18 A. I'm not refusing to answer the
19 question.

20 Q. You are refusing.

21 My question has nothing to do with
22 Virginia. Let me make the record here. My
23 question has nothing to do with Virginia. I
24 want it to be clear for the court. My
25 question has nothing to do with Virginia.

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2 What I'm asking you is whether you
3 believe Jeffrey Epstein abused minors?

4 MR. PAGLIUCA: I object to the form
5 and you made your record, she answered
6 the question. A fair reading of her
7 answer is she doesn't have a belief
8 because she doesn't have any personal
9 knowledge.

10 MS. McCAWLEY: Now you are
11 testifying for the witness. Let her
12 answer the question.

13 MR. PAGLIUCA: It's a fair answer
14 to the question.

15 A. Again, I testified my only personal
16 knowledge concerns Virginia and everything
17 Virginia has said is an absolute lie, which
18 is why we are here in this room. If you are
19 asking me to testify about things I have no
20 knowledge of other than the police report
21 that you showed me, I am not in a position to
22 make a statement based on that because you
23 are asking me to speculate and I cannot
24 speculate.

25 Q. I'm asking you about your belief.

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2 I'm not asking you to speculate at all. I'm
3 asking what you believe.

4 A. You are asking me to speculate and
5 I won't speculate.

6 Q. I'm not asking you to speculate.
7 I'm asking what you believe.

8 MR. PAGLIUCA: She answered the
9 question and we can move on.

10 MS. McCAWLEY: She hasn't answered
11 the question.

12 MR. PAGLIUCA: We are not going to
13 engage in this debate. She answered the
14 question. If you want to mark it and
15 move to compel an answer to the
16 question, have at it. Okay.

17 Q. Ms. Maxwell, is it your belief that
18 Jeffrey Epstein interacted sexually with
19 minors?

20 A. Again, you are asking me the same
21 type of question exactly but with different
22 language. Again, my only knowledge of
23 somebody who claims these things that I have
24 personal knowledge of is Virginia. Virginia
25 is an absolute liar and everything she has

1 G Maxwell - Confidential
2 said is a lie. Therefore, based on those
3 lies I cannot speculate on what anybody else
4 did or didn't do because if Virginia is the
5 example of what that story is and everything
6 she said is false, so everything that leads
7 from that is false.

8 Q. So the 30 other minor children in
9 the police report are also telling lies about
10 being sexually abused during massages with
11 Mr. Epstein?

12 MR. PAGLIUCA: Objection to the
13 form and foundation. Counsel, can you
14 show me in these police reports who the
15 30 minors are?

16 MS. McCAWLEY: I'm asking my
17 question.

18 MR. PAGLIUCA: You are making a
19 representation about numbers, you are
20 making a representation on the record
21 about what people said or didn't say.
22 We have no knowledge about that. These
23 are all redacted records so these are
24 bad questions. They don't lead to any
25 admissible evidence. It is only being

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2 propounded to the witness to harass her.

3 So we are done with these questions.

4 MS. McCAWLEY: Are you done?

5 MR. PAGLIUCA: Yes.

6 Q. My question is, are you aware that
7 Jeffrey Epstein was convicted of having
8 relations with a minor child?

9 MR. PAGLIUCA: She answered that
10 question already.

11 MS. McCAWLEY: I'm getting to my
12 next question.

13 MR. PAGLIUCA: Ask your next
14 question. Don't keep asking the same
15 question.

16 MS. McCAWLEY: You are now
17 shouting, I want the record to reflect
18 that you are interrupting the
19 deposition. I ask you to calm down,
20 take a deep breath and please let me ask
21 my questions.

22 MR. PAGLIUCA: Your behavior is
23 inappropriate.

24 Q. I will ask you again.

25 Do you believe that Jeffrey Epstein

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2 interacted sexually with minors?

3 A. Again, I go back to this, my only
4 actual knowledge is with Virginia and
5 Virginia is a liar, so I can only talk to
6 what Virginia's story and as I said before
7 and there are so many examples, I mean
8 thousands of examples of her lies, that that
9 is the only thing I can talk to.

10 Q. Based on that you do not believe
11 that Jeffrey Epstein sexually abused minors?

12 A. Again, as I said, I'm only talking
13 to what I know, I can only talk to Virginia.

14 Q. So is it your belief that Jeffrey
15 Epstein did not sexually abuse minors?

16 A. Again, I can only talk to what I
17 know and I know that Virginia is a liar and
18 that what she said is a lie. So I can only
19 testify to what she accused and you guys put
20 in the press for salacious purposes and
21 whatever terrible, inappropriate, unethical
22 and terrible reasons you chose to do that
23 about me and I can testify those are all
24 lies.

25 Q. Do you know whether Jeffrey Epstein

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2 sexually abused any minor children?

3 A. Again, I only know 1000 percent
4 that Virginia is a liar. I can only talk to
5 Virginia, her lies and your inappropriate,
6 unethical, really unattractive, terrible use
7 of her and the way that you have abused the
8 system, used the press for purposes that are
9 unethical, inappropriate and appalling.

10 Q. Do you believe that Jeffrey Epstein
11 used massages to lure minors to have sex with
12 him?

13 A. Again, that is Virginia's
14 testimony, which is a lie.

15 Q. But do you believe that?

16 A. Again, I refer back to Virginia.

17 Q. I'm asking whether you believe it
18 or not?

19 A. I can only go with what I know and
20 I know Virginia is a liar and therefore
21 that's a lie.

22 Q. So you don't believe that?

23 A. I said, I only know that Virginia
24 is lying.

25 Q. Are you aware that Jeffrey Epstein

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2 is a registered sex offender?

3 A. I am.

4 Q. Are you aware that Jeffrey Epstein
5 paid considerable amounts of money to settle
6 lawsuits with the minor children that he had
7 sexual contact with?

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

10 A. I have no knowledge of those
11 issues.

12 Q. Why did you continue to maintain
13 contact with Jeffrey Epstein after he pled
14 guilty?

15 A. I'm a very loyal person and Jeffrey
16 was very good to me when my father passed
17 away and I believe that you need to be a good
18 friend in people's hour of need and I felt
19 that it was a very thoughtful, nice thing for
20 me to do to help in very limited fashion
21 which was helping if he had any issue with
22 his homes, in terms of the staffing issues.
23 It was very, very minor but I felt it was
24 thoughtful in somebody's hour of need.

25 Q. Did he continue to pay you during

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2 that time period?

3 A. I was paid a little.

4 Q. You were paid?

5 A. Yes.

6 Q. When you say a little, what you did
7 mean by that?

8 A. I don't recall exactly the amount.

9 Q. So in 2009 when you left him, what
10 were you being paid?

11 A. I just told you, I don't recall.

12 Q. Were you being paid \$100,000?

13 A. I just don't you I don't recall.

14 Q. Were you paid over a million
15 dollars?

16 A. I think I would remember over a
17 million dollars.

18 Q. So it was under a million dollars?

19 A. It was under a million dollars.

20 Q. Was it over \$500,000?

21 A. I just told you, it was under 500,
22 it was an amount of money less than \$500,000,
23 less than a million dollars and I did it out
24 of thoughtfulness and consideration for
25 somebody who was in trouble.

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2 Q. Did you have an attorney to consult
3 with during the criminal investigation of
4 Jeffrey Epstein?

5 A. I don't believe I did.

6 Q. When did you learn that a search
7 warrant was executed for the Palm Beach
8 house?

9 A. I don't recall exactly.

10 Q. Were you present at the house in
11 advance of the search warrant being executed?

12 MR. PAGLIUCA: Object to the form
13 of the question.

14 A. I don't remember when the search
15 warrant was executed and I don't remember the
16 year that the search warrant was executed and
17 whenever that was, I already testified, I was
18 very, very infrequently at the house. So
19 highly unlikely but I was there a couple of
20 days, I just don't know which days it was in
21 relation to the police situation.

22 Q. Did you have a computer at the Palm
23 Beach home that was a computer that you would
24 use?

25 A. No.

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2 Q. Was there a computer available for
3 use in the Palm Beach house?

4 A. Can you be more specific.

5 Q. Was there anywhere in the Palm
6 Beach house where there was a computer where
7 you said you worked for him and there were
8 other staff in the house, was there ever a
9 computer in the Palm Beach mansion that was
10 accessible by you or other staff?

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

13 A. I stopped being regularly at the
14 house sometime in 2003 so from 2003 to when
15 the police search was executed, I have no
16 memory of what there was or what there was
17 not. I can only testify for what was there
18 when I was present largely.

19 Q. So in 2003 when you were still
20 there, was there a computer that was
21 accessible to you or other staff at the
22 house?

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

25 A. There was a desktop computer that

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2 people could use -- just like you would use
3 if you needed to go online to get something,
4 that people could use.

5 Q. Was that on a desk that you would
6 use in your work capacity when you were at
7 the house?

8 A. It was a desk, it was a room I was,
9 I didn't really use that computer.

10 Q. Were there images of naked girls
11 whether they be under the age of 18 or over
12 the age of 18 on that computer?

13 A. I have no recollection of any naked
14 people on that computer when I was there in
15 2003, we are talking.

16 Q. What about from say '99 to 2003?

17 A. No, I can't recollect any naked
18 pictures.

19 Q. Why were the computers removed from
20 the house before the search warrant was
21 executed?

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

24 A. I have no knowledge of anything
25 like that.

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2 Q. Do you know where the computers are
3 now?

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

6 A. I don't know what computers you are
7 talking of and I have no idea what you are
8 referencing.

9 Q. In 2003 you said there was a
10 computer in a room on a desk?

11 A. Right.

12 Q. Do you know where that computer is
13 now?

14 A. I do not.

15 Q. Did you take pictures of nude
16 females in any of Epstein's homes or in and
17 around the homes, out by the pool or anywhere
18 like, in the Palm Beach home, the New York
19 home, USVI home or the New Mexico home?

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

22 A. Can you repeat the question.

23 Q. Did you take pictures of nude woman
24 over 18 or under 18, females, in any of
25 Jeffrey Epstein's homes, inside or outside in

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2 or around the home?

3 A. I think we need to distinguish
4 between anyone under the age of 18 and over
5 the age of 18.

6 Q. We will start with, did you take
7 pictures of nude females in or around any of
8 Jeffrey's homes of women or females that were
9 under the age of 18?

10 A. No.

11 Q. Did you take pictures of nude
12 females --

13 A. Nude you mean with no clothing on.

14 Q. Or half nude, with no top on, any
15 sort of nakedness to an individual.

16 In any of Jeffrey's homes, either
17 Palm Beach, New Mexico, USVI or New York
18 either outside by the pool, anywhere in or
19 around those homes of females over the age of
20 18?

21 A. So it is possible that I took
22 pictures of people that were somehow semi or
23 had some clothing on or no clothes on but at
24 no time were any of these pictures remotely
25 inappropriate. They were, you could see them

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2 in a mainstream magazine today, there would
3 be no inappropriateness, they would be
4 covered, concealed, you wouldn't see anything
5 at all.

6 The types of -- first, I took very
7 few and they were always by request, this was
8 a picture you could put on your -- gift to
9 your parent or to your grandparents to put on
10 their mantel piece . It would be a very
11 benign sort of attractive picture where you
12 wouldn't see anything.

13 Q. Who would request those pictures?

14 A. From time to time, people, men and
15 women would ask to have nice photographs of
16 them taken.

17 Q. And did Jeffrey Epstein request
18 those pictures?

19 A. I don't ever recall him asking me
20 to take pictures.

21 Q. Did you give him pictures of naked
22 females as a present?

23 A. I don't recall ever giving a
24 present of -- I don't know why a photograph
25 would constitute a gift.

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2 Q. Not as a gift.

3 Do you recall ever giving Jeffrey
4 Epstein pictures that you've taken of these
5 individuals in a naked state?

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

8 A. First of all, we've already
9 established that they are not naked state
10 photographs.

11 Q. A piece of them being naked as you
12 described.

13 A. I said they would be attractive as
14 you would see in mainstream magazines and
15 those pictures could be a picture of a hand
16 or a foot, they didn't necessarily
17 constitute -- I know where you are headed
18 with this and it's nowhere appropriate and
19 it's really unattractive.

20 Q. I'm not headed anywhere. I'm just
21 asking the questions. Did you give Jeffrey
22 Epstein any of these pictures that you took
23 of females in the state that you described?

24 A. I can't recall ever giving him
25 pictures but it is possible that I took

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2 pictures of people that would end up -- or a
3 friend of his that he would have -- not naked
4 or not inappropriate in any way, that he
5 might have somewhere in his house.

6 Q. Name for me all the individuals who
7 you took these pictures of?

8 A. It's entirely impossible for me to
9 name people. First of all, it was just -- it
10 would not be possible, I took thousands of
11 photos, not of people, I mostly take pictures
12 of landscapes and things. I have no
13 recollection specifically of people that I
14 took pictures of.

15 Q. So you can't remember, is it your
16 testimony you can't remember one person that
17 you took a picture of in either a naked or
18 semi naked state?

19 A. I seriously cannot recall. I just
20 don't recall.

21 Q. Did you take a picture of Virginia
22 Roberts either alone or with another
23 individual in a naked state?

24 A. I have never taken, I believe, any
25 pictures of two people in any type of

1 G Maxwell - Confidential

2 situation, naked as you describe.

3 Q. Did you take a picture of Virginia
4 Roberts on her own without another individual
5 in it in a naked state?

6 A. I don't recall ever taking a
7 picture of Virginia -- naked, we are not
8 referring to someone with no clothing on at
9 all, we are referring to someone that could
10 be semi clad or could have a towel or we are
11 not referring to anything inappropriate.

12 Q. Was this a hobby of yours to take
13 pictures of the type that you are describing?

14 MR. PAGLIUCA: Object to the form.

15 A. I just testified, I didn't take
16 pictures of many people. My preference is
17 pictures for landscapes and for architectural
18 pieces.

19 Q. Where are those pictures today?

20 A. I have no idea.

21 Q. Do you have them in your home?

22 A. I do not.

23 Q. Do you have them on your computer?

24 A. I do not.

25 Q. What has Jeffrey Epstein told you

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2 about the allegations related to the criminal
3 investigation that he was involved in?

4 A. I really can't say, not because I
5 don't want to say but I just think of what he
6 has said to me over the course of this time.

7 Q. Did he explain it to you and
8 explain what the charges were against him?

9 A. I never had a detailed conversation
10 with him, as I recall.

11 Q. Not detailed, just did he explain
12 anything that was happening to him?

13 A. I haven't spoken to him for so
14 long. I can't possibly testify to what
15 conversations I had with him over the course
16 of time.

17 Q. Did he talk to you about any of the
18 girls that were making allegations against
19 him other than Virginia?

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

22 A. You are talking about the police
23 records again, all of that?

24 Q. Yes.

25 A. I have never had a conversation

1 G Maxwell - Confidential

2 about those things.

3 Q. What has Jeffrey Epstein told you
4 about Virginia Roberts?

5 A. That she is a liar.

6 Q. What does he base that on?

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

9 A. You would have to check with him.
10 I can tell you why I think she is a liar, I'm
11 happy to do that.

12 Q. Did he tell you he did not have
13 sexual relations with Virginia Roberts?

14 A. I can only testify what I know.

15 Q. I'm asking, has he told you that he
16 did not have sexual relations with Virginia
17 Roberts?

18 A. I can only tell you what I know
19 about Virginia Roberts, I cannot tell you
20 what he knows about Virginia Roberts.

21 Q. I'm asking, did he tell you that he
22 did not have sexual relations with Virginia
23 Roberts?

24 A. All he told me is she is a liar.

25 Q. That's all he said about Virginia

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2 Roberts?

3 A. We went through all the lies that
4 you have sold to the papers and sold in
5 general and we have analyzed her lies and
6 your lies and your inappropriate behavior in
7 detail.

8 Q. Did he ever say that he did not
9 have sexual relations with Virginia Roberts?

10 A. I just testified that we went
11 through all of her lies.

12 Q. I understand what you said. I'm
13 asking you a question.

14 Did he ever tell you that he never
15 had sex with Virginia Roberts?

16 A. I don't recall whether he ever -- I
17 don't know I ever had that question. We
18 focused on the lies she did say she had with
19 him as relates to me. I don't remember
20 asking him about his problems with her. I'm
21 interested in what she says about myself.

22 Q. Did you also talk about what things
23 that Virginia Roberts was saying that were
24 true?

25 A. There isn't anything that she said

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2 that was true.

3 Q. Nothing she said that you are aware
4 of is true?

5 A. I think she is correct when she
6 talks about what her name is.

7 Q. Anything else?

8 A. I'm sure there must be one or two
9 other details but they are so far and few
10 between, I would have to look in detail at
11 all of her allegations to pinpoint what
12 possibly could be true.

13 Q. Did you ever ask Jeffrey if he had
14 sex with minors?

15 A. I have never been asked that
16 question.

17 Q. You never asked him that question.

18 What analysis did Jeffrey do to
19 determine that the statements Virginia
20 Roberts were making were lies?

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

23 A. Ask me again, please.

24 Q. What analysis did Jeffrey do to
25 determine that the statements that Virginia

1 G Maxwell - Confidential

2 Roberts were making were lies?

3 MR. PAGLIUCA: Objection to the
4 form and foundation. And to the extent
5 that any of this answer calls for any
6 privileged communication, I'm
7 instructing, with myself or another
8 lawyer representing you or in any common
9 interest agreement, I'm instructing you
10 not to answer.

11 MS. McCAWLEY: The court ruled she
12 is entitled and you had to produce
13 documents about communications with
14 Jeffrey, that's what I'm asking about.
15 I'm not asking about communications with
16 lawyers.

17 Q. I'm asking what analysis did
18 Jeffrey do to determine that the statements
19 that Virginia Roberts was making were lies,
20 if you know?

21 MR. PAGLIUCA: My objection is to
22 the extent she learned any of that
23 information as a result of either a
24 privileged communication from a lawyer,
25 one of her lawyers or a privileged

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2 communications subject to a joint
3 defense agreement or common interest
4 agreement, I'm telling her not to
5 answer. To the extent she has
6 information outside of those things, she
7 is permitted to answer.

8 Q. Do you understand?

9 So if it was a conversation with a
10 lawyer which I'm not asking about, I don't
11 want you to tell me about your conversations
12 with lawyers.

13 I want you to tell me whether
14 Jeffrey Epstein ever told you what he
15 analyzed in order to determine which of -- of
16 what Virginia were saying were lies?

17 A. I do not know what he did, no.

18 So you agree she is lying, Singrid.

19 Q. I do not agree with that and I'm
20 asking the questions.

21 A. You just said her lies.

22 Q. I'm repeating a statement you made.

23 Q. Are you saying it's an obvious lie
24 that Jeffrey Epstein engaged in sexual
25 conduct with Virginia while Virginia was

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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

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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

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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

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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

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2 can positively say myself, not what somebody
3 else is going to represent.

4 Q. When you were saying that she was,
5 her claims of having sex with Jeffrey Epstein
6 were obvious lies, are you saying she is
7 lying about engaging in sexual conduct with
8 Jeffrey Epstein when she was underage?

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

11 Q. You can answer.

12 A. Again, this was a statement that
13 was put out from my lawyer through my press
14 person in London. And I can only testify to
15 the obvious lies that she says about me. I
16 cannot make representations about lies she
17 says about someone else, but she lies so many
18 times about me, one can probably infer she is
19 lying about everything.

20 Q. So is she not lying when -- is she
21 telling the truth when she says she had sex
22 with Jeffrey Epstein when she was underage?

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

25 A. Again, I don't know how else to

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2 tell you, I can only talk about what I know
3 to be true. What I know is her story about
4 how she claims that initial situation
5 happened is so egregiously false and such a
6 giant fat enormous, repulsive, disgusting,
7 inappropriate, vile lie, that that I can
8 testify to.

9 Q. Was she lying when she said she met
10 you at Mar-a-Lago?

11 A. Again I already testified I don't
12 recall meeting her at Mar-a-Lago.

13 Q. We showed you a document where you
14 said you met her at Mar-a-Lago when she was
15 17, is that correct?

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

18 A. I think I already testified to
19 that. What I remembered based on all the
20 rubbish she has written and all the many
21 articles I have read, maybe in the moment
22 when I wrote that, have caused me to have
23 that but on reflection I don't recall it as I
24 sit here today.

25 Q. Are you saying that it was an

1 G Maxwell - Confidential
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 Epstein's airplanes?

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

5 Q. You can answer.

6 A. Are you referring to my statement
7 where that says that?

8 Q. I'm referring to the language you
9 use in your statement that says, obvious
10 lies?

11 A. Can you read my entire statement?

12 Q. Sure, let me pass it out.

13 (Maxwell Exhibit 10, email, marked
14 for identification.)

15 Q. This is Bates GM 00068 and we will
16 mark it as -- what you have in front of you
17 is a statement at the top. This was produced
18 by your counsel, it is indicated Bates No.
19 GM 00068. At the top the date reflects
20 January 2, 2015 from, appears to be a Ross ■
21 ■ subject line, is you and
22 then there is a number of individuals you can
23 see at the top that are copied on this that
24 is sent to and bcc'd on this statement.

25 The statement, there are two parts

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2 of it. There is an opening email that says,
3 please find an attached quotable statement on
4 behalf of Ms. Maxwell and there is more
5 language there and it's from Ross Gow and
6 then it says in the body of it, Jane Doe No.
7 3 or Jane Doe 3 is Virginia Roberts so not a
8 new individual. The allegations made by, and
9 it says Victoria but I believe that means
10 Virginia Roberts, against Ghislaine Maxwell
11 are not true. The original allegations are
12 not new and have been fully responded to and
13 shown to be untrue. And the next paragraph
14 says, Each time the story is retold, it
15 changes with new salacious details about
16 public figures and world leaders and now it
17 is alleged by Ms. Roberts that Al Dershowitz
18 is involved in having sexual relations with
19 her which he denies. Ms. Roberts claims are
20 obvious lies and should be treated as such
21 and not publicized as news as they are
22 defamatory.

23 The last paragraph states,
24 Ghislaine Maxwell's original response to the
25 lies and defamatory claims remains the same.

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2 Maxwell strongly denies allegations of the --
3 strongly denies allegations of an unsavory
4 nature which have appeared in the British
5 press and elsewhere and reserves her right to
6 seek redress at the repetition of such old
7 defamatory claims.

8 Are you saying that it's an obvious
9 lie that Virginia Roberts traveled on Jeffrey
10 Epstein's planes?

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

13 A. I'm saying what's an obvious lie
14 and I think we can all agree, you just had
15 the case tossed out by Alan Dershowitz. He
16 just got removed from the case because you
17 put him in a case that he wasn't supposed to
18 be in so what was said about him is not true.

19 Q. Are you saying that it's an obvious
20 lie that Virginia Roberts traveled on Jeffrey
21 Epstein's plane?

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

24 A. You have given me plane records
25 that has her name on it but as I already

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2 testified those aren't federally mandated
3 things and I can see her name on it but
4 that's what I -- I told you I don't recall
5 her on any planes.

6 Q. Is is that one of Virginia's
7 obvious lies?

8 A. There are more obvious ones.

9 Q. Is that one of them?

10 A. I can't testify to her being on a
11 plane or not.

12 Q. So is that an obvious lie?

13 A. There are more obvious lies, like
14 Clinton.

15 Q. I understand there are more obvious
16 ones. I'm asking you, is the fact that she
17 said she traveled on Epstein's planes an
18 obvious lie?

19 A. I think we can probably say because
20 you see her name on a plane record and she
21 went from A to B, that would not be the
22 obvious lie that I would pick.

23 Q. What obvious lie were you picking
24 when you made this statement?

25 A. There are so many that I would be

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2 thrilled to go through all of them.

3 Q. Let's go through them.

4 What's the first one?

5 A. Her characterization of the first
6 meeting at Mar-a-Lago.

7 Q. What part of that was an obvious
8 lie?

9 A. The characterization that she said
10 that she said she was accosted. She looked
11 like, as best as I can recall, if I met her
12 in Mar-a-Lago as she claims, she worked at
13 Mar-a-Lago, she claims, and her statement she
14 worked at Mar-a-Lago, she would have been
15 dressed as all the spa people in Mar-a-Lago
16 would have been. It would have been
17 impossible to identify her as someone other
18 than someone who worked at a spa. She made
19 many claims, she has been a bathroom
20 attendant, front of house attendant, we don't
21 know what she was, so her obvious lies are
22 her contradictory of her own personal
23 statements within that.

24 Q. So what part of her statement
25 relating to Mar-a-Lago --

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2 A. I'm carrying on.

3 Q. I'm sorry. I thought you were
4 done.

5 A. Please. Her statement also that
6 she was driven by her father to Palm Beach.
7 She was driven by her mother, as a matter of
8 fact. Her whole entire characterization of
9 the first meeting with Jeffrey, as I was
10 outside speaking to her mother.

11 Q. Let me stop you there, so we don't
12 get too far ahead. Let me make sure I
13 understand your testimony.

14 The first, in the first piece when
15 you were talking, I believe you said and
16 correct me if I'm wrong, that her
17 characterization of the first meeting at
18 Mar-a-Lago was an obvious lie.

19 What part of that meeting was an
20 obvious lie?

21 A. By her own testimony, all her
22 various many different descriptions of what
23 she was or wasn't or where she was or wasn't,
24 they have all changed. She was either front
25 of house or bathroom attendant. I don't know

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2 what she was, so just by her own words, one
3 doesn't know what's true and what isn't true.

4 Q. Are you saying what position she
5 said she was working in, is that what you are
6 considering the obvious lie?

7 A. I said inconsistency within her own
8 statement from everything, so in the
9 beginning it starts off with different
10 statements.

11 Q. Then I believe you said the second
12 piece was that she was driven by her father?

13 A. I said she was driven by her
14 mother.

15 Q. That's the obvious lie?

16 A. It's an obvious lie to me.

17 Q. You said why don't you state it in
18 your own words but the characterization of
19 how she was with Jeffrey, what about that is
20 an obvious lie?

21 A. I was standing outside talking to
22 her mother so the entire story is a
23 fabrication.

24 Q. Did she not have sex with Jeffrey
25 Epstein during that first massage?

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

4 A. I was talking to her mother so...

5 Q. Do you know whether that's an
6 obvious lie, whether she had sex in that room
7 or not?

8 A. Her story about what happened --
9 let's also be -- the story as first hit the
10 press was that somebody else led her to
11 Jeffrey's room, it was not me and then it
12 turned to being me so we have an obviously
13 important inconsistency, lie in my -- that's
14 how I would characterize a lie. It cannot be
15 me or somebody else, it can only be one or
16 the other.

17 Q. Who is the other person she said
18 took her to the room?

19 A. Why don't you ask her.

20 Q. I'm asking you.

21 A. How would I possibly know.

22 Q. You are saying that's a lie.

23 A. It was a lie in the papers, she
24 said it in the newspaper, it was in the
25 newspaper.

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2 Q. How do you know she wasn't
3 identifying you?

4 A. She said somebody.

5 Q. How do you know that somebody
6 wasn't you?

7 A. Why did it suddenly become me, why
8 not say it was me and be done with it.

9 Q. So it's a lie because she
10 originally may not have named you and then
11 named you later?

12 A. It's obviously inconsistent to
13 somebody who wasn't me.

14 Q. How do you know it wasn't you?

15 A. I know it wasn't me because I was
16 talking to her mother.

17 Q. But she then named you, is what you
18 are saying?

19 A. That's an obvious lie.

20 Q. She named you?

21 A. It's an obvious lie because I
22 wasn't even in the house.

23 Q. Is it an obvious -- who did lead
24 her up to Jeffrey's room while you were
25 talking to her mother?

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2 A. You would have to ask Virginia, I
3 don't know if she was led up to his room.

4 Q. You were standing with the mother,
5 is that correct?

6 A. That's correct.

7 Q. Who was working at the house that
8 day?

9 A. I believe John Alessi was.

10 A. Would John Alessi typically lead
11 someone up to the room where Jeffrey was
12 having a massage?

13 A. I don't know she was led up to the
14 room to have a massage.

15 Q. She would have found her way on her
16 own?

17 A. I would suggest that that entire
18 story never happened at all in any of its
19 form.

20 Q. If you stood outside with the
21 mother, what did you think happened inside
22 then?

23 A. I believe that somebody, it wasn't
24 me, John Alessi probably took her to meet
25 Jeffrey Epstein while he was working at his

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2 desk and they had a conversation.

3 Q. Did Jeffrey tell you that?

4 A. No but that would have been a
5 normal interaction. I don't believe for a
6 second -- I know her entire characterization
7 didn't happen because I was outside talking
8 to her mother the entire time.

9 Q. Why would she have come for a
10 massage and not given a massage?

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

13 A. We are talking about her
14 characterization of the first time that she
15 came to the house.

16 Q. If I'm following you correctly,
17 you're saying she walked in and would have
18 gone to -- it's your assumption she would
19 have gone and talked to Jeffrey and left?

20 A. When I was working for Jeffrey,
21 typically he would meet someone before
22 getting a massage from them to see if he
23 wanted to have a massage from them,
24 typically.

25 Q. So he would not have someone come

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2 up to the room and start a massage?

3 A. He would not.

4 Q. So the young girls in the police
5 report who say they came over and were led up
6 to the room on the first day, would they be
7 wrong about that?

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

10 A. I can't comment what happened when
11 I was not at the house. I can only comment
12 when I was at the house.

13 Q. Was there ever a time where a woman
14 came to the house for the first time to give
15 a massage and Jeffrey had the massage that
16 day?

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

19 A. Can we talk about adult
20 professional masseuses, please?

21 Q. I'm asking, whether adult or
22 underage?

23 A. I'm not interested in talking about
24 underage. I can only testify to what I know,
25 professional masseuses, adult, I cannot

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2 testify to anything else.

3 Q. Why can't you testify to an
4 underage girl that came over and was led up
5 to the room for a massage?

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

8 A. The police records you are
9 referring to?

10 Q. You are saying that didn't happen.
11 You're saying I can only testify to adults
12 that came for an interview and were led up to
13 the room. Why can't you testify to whether
14 an underage girl was brought in for an
15 interview and led up --

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

18 Q. Go ahead.

19 A. Can you reask the question.

20 Q. Why can't you testify as to an
21 underage girl who came over for an interview
22 and then was then led up to the room for the
23 massage?

24 A. You've mangled your entire
25 question. Can you please reask that in a way

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2 that I can answer it correctly?

3 Q. Why can you not testify as to
4 whether an underage girl, you said you can
5 testify as to females that were over the age
6 of 18, why can't you testify as to whether an
7 underage girl came over for an interview and
8 on the same day --

9 A. I don't know what you mean by
10 interview.

11 Q. You just said that Jeffrey Epstein
12 interviewed, it was your word, interviewed
13 the masseuses before they gave massages, is
14 that correct?

15 A. The word interview is making me --
16 I'm English, so you could have some
17 difficulty understanding the way I
18 communicate.

19 Q. I'm using your word.

20 A. Then I will reuse it a different
21 word. He would meet them because receiving a
22 massage is something you want to make sure
23 you are comfortable with the person and so
24 interview is not the correct word but you
25 would meet them to have a conversation with

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2 them to see if you want to have a massage
3 with that person.

4 Q. Did Jeffrey Epstein ever meet an
5 underaged girl and on the same day receive a
6 massage from that girl?

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

9 A. I can't possibly testify to what
10 happened after I was not at the house.

11 Q. If you are aware, at any time you
12 were at the house, did you ever see that?

13 MS. MENNINGER: Let her finish the
14 question.

15 A. I can only testify to people who
16 were adult professional masseuses who came to
17 the house. I cannot testify to something I'm
18 not party to and don't know about. I can
19 only testify to what I saw. So when
20 professional adult masseuse, male and/or
21 females would come to the house, typically
22 when I was there, typically he would meet
23 with them prior, to have a conversation with
24 them about their experience, whatever, to
25 decide whether it would then A, if he had

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2 time for a massage at that time or B, whether
3 he could have a massage at that moment.

4 Q. Was Virginia an adult when she came
5 over, was she over 18?

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

8 A. I think we established, as of
9 today, we are all aware, everyone in this
10 room that she was 17.

11 Q. So you have been present when a
12 minor was brought over for a massage for
13 Jeffrey?

14 A. Can I say, as you are able to have
15 a massage at 17, so she came as a masseuse.

16 Q. I'm not saying whether or not you
17 are able to. I'm saying you've been present
18 at Jeffrey's home when an underage minor has
19 come over to give him a massage?

20 A. That's just not how that works.
21 You are able to be a masseuse at 17 so she
22 came to give -- for a massage, at 17 you are
23 able to come and give a massage.

24 Q. I'm not asking whether she is able
25 to do it. I'm asking whether you were

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2 present at the home when a girl under the age
3 of 18 came over for the purposes of giving a
4 massage?

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

7 Q. You can answer.

8 A. You can be a professional masseuse
9 at 17 in Florida, so as far as I am aware, a
10 professional masseuse showed up for a
11 massage. There is nothing inappropriate or
12 incorrect about that and your
13 mischaracterization of it, I think is
14 unfortunate.

15 Q. How many teenagers did he have that
16 were professional masseuses that worked in
17 his home?

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

20 Q. How many?

21 A. First of all, I am not aware of
22 teenagers who worked in his home.

23 Q. You are aware of Virginia Roberts
24 and you've stated she was 17 and she worked
25 for him, correct?

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2 A. No. I did not state that at all,
3 you are mischaracterizing my words and what I
4 said.

5 What I said was that we can all
6 agree and I think at this point there is not
7 one person in this room, however much you
8 would like her to be younger, to say she was
9 not 17 because that has been a very offensive
10 thing that you have all done. So she was 17.
11 At 17 you are allowed to be a professional
12 masseuse and as far as I'm concerned, she was
13 a professional masseuse. There is nothing
14 inappropriate or incorrect about her coming
15 at that time to give a massage. Her entire
16 characterization of her first time at the
17 house was to me an obvious lie, given it was
18 impossible for her entire story to take place
19 given I was speaking to her mother the entire
20 she was at the house.

21 Q. So it was impossible that day, that
22 first day she came and you were speaking to
23 the mother, for Virginia Roberts to have had
24 sex with Jeffrey Epstein during the time that
25 you were outside with her mother?

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

4 A. You, again, are completely
5 mischaracterizing. I can only testify to
6 what I heard obvious lies about me and her
7 obvious lies about me are that she, as you
8 put out to the papers and every other which
9 way, went upstairs with her, didn't happen.
10 So that to me is an absolute, obvious lie. I
11 also don't believe that her -- her
12 mischaracterization of the length of time she
13 was there because as I recall, she just met
14 with Jeffrey and then left with her mother.
15 That's my recollection.

16 Q. So you were standing outside the
17 entire time that Virginia was in the house,
18 is that correct?

19 A. That is correct.

20 Q. So can you testify as to whether or
21 not, do you know either from Jeffrey or any
22 other source whether or not Virginia Roberts
23 had sex with Jeffrey on that first day that
24 she was at the house?

25 A. We can categorically state,

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2 absolutely 1000 percent that she did not have
3 any type of sexual relations as described by
4 you in your court papers that took place
5 because those allegedly according to her lies
6 involved some aspect of me.

7 As I was standing outside with her
8 mother the entire time, her entire story is a
9 lie. Therefore, to ask me what she did or
10 didn't do during that time, I can only
11 testify to what she said about me, which was
12 1000 percent false.

13 Q. So let's not take the first time,
14 let's take the next time she comes.

15 A. No no, how can do you that, when
16 the basis of this entire horrible story that
17 you have put out is based on this first
18 appalling story that was written, repeated,
19 multiply by the press that lied about her
20 age, lied about the first time she came, lied
21 about and characterized the entire first
22 time. I have been so absolutely appalled by
23 her story and appalled by the entire
24 characterization of it and I apologize
25 sincerely for my banging at the table

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2 earlier, I hope you accept my apology. It's
3 borne out of years of feeling the pressure of
4 this entire lie that she has perpetrated from
5 our first time and whilst I recognize that
6 was -- I hope you forgive me sincerely
7 because it was just the length of time that
8 that terrible story has been told and retold
9 and rehashed when I know it to be 100 percent
10 false.

11 Q. So not the first time she came, but
12 the second time she came or the third time or
13 any time she came, did you ever participate
14 in a massage with her in Jeffrey Epstein's
15 room?

16 A. I have never participated at any
17 time with Virginia in a massage with Jeffrey.

18 Q. Have you ever participated at any
19 time with Virginia in any kind of sexual
20 contact or sexual touching with Jeffrey and
21 Virginia?

22 A. I have not.

23 Q. So we were going through the list
24 of obvious lies and you were talking about
25 the first time which I believe we have

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2 completed but you can add to that if you need
3 to.

4 What other obvious lies did
5 Virginia Roberts tell that you were referring
6 to in your statement?

7 A. Oh my goodness. Well, I think we
8 can totally cover the Clinton story, the
9 story that I flew him with Secret Service and
10 there was a dinner with other people and that
11 entire thing is 100 percent fictitious. I
12 have testified for the record and I'm happy
13 to do it again, that I have never flown Bill
14 Clinton, myself as a pilot in a helicopter at
15 any time, anyplace, at any time, to any part
16 of the world.

17 Q. What other obvious lies were you
18 referring to?

19 A. She was referring to Al Gore, she
20 is referring to a bunch of people. I don't
21 believe Al Gore ever came to the island at
22 any time ever. I don't even know Al Gore
23 actually.

24 Q. Just one moment, I want to hear all
25 of them, but when you say you don't believe

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2 Al Gore ever came to the island, do you know
3 whether Al Gore ever came to the island?

4 A. Al Gore never came to the island.

5 Q. How do you know that?

6 A. Jeffrey doesn't know him, I don't
7 know him and I think had Al Gore -- I don't
8 think -- had Al Gore gone to the island
9 during the period when I would have been
10 involved in organizing a trip, I would have
11 been aware of it.

12 Q. So go ahead, you had another one.

13 A. It would be easier if I could see,
14 do you mind if I take a reference at some of
15 these newspaper articles or you just want me
16 to go from memory.

17 Her entire characterization of what
18 took place in London at my house with Prince
19 Andrew.

20 Q. Was it an obvious lie that she was
21 at your house in London?

22 A. We can't really establish the
23 photograph and all that. I don't know if
24 that's true, if that's a real picture or not.

25 Q. So you dispute that you were

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2 actually photographed in your town home in
3 London --

4 A. I don't recognize that picture.
5 I'm not sure if that's a real picture or not.

6 Q. And have you talked to Prince
7 Andrew about that picture?

8 A. We discussed Virginia's entire tail
9 and he asked me if he even knew her.

10 Q. So did Prince Andrew tell you that
11 he did not have sex with Virginia Roberts?

12 A. He doesn't even know who Virginia
13 Roberts is.

14 Q. Did he tell you that he didn't have
15 sex with her?

16 A. It would be difficult to have sex
17 with someone you don't know.

18 Q. He may not remember her?

19 A. I think the inference is he didn't
20 know who she was, he didn't have any
21 recollection of her whatsoever.

22 Q. Has Prince Andrew ever come to your
23 London town home?

24 A. Yes. Ever being the entire time I
25 owned my house, yes.

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2 Can I go on on her obvious lies?

3 Q. If you have more.

4 A. I have -- her entire
5 characterization -- I took her shopping into
6 Burberry and bought her a very expensive
7 dress and if this photo were real and if this
8 is -- I would never -- the outfit doesn't
9 work at all so --

10 Q. Do you not remember taking her
11 shopping or are you saying it's an obvious
12 lie, you know you did not take her shopping?

13 A. I did not take her shopping. I did
14 not buy her a \$5,000 handbag.

15 Q. Did Jeffrey buy her a \$5,000
16 handbag?

17 A. Her accusation was that I did.

18 Q. Do you know if Jeffrey bought her a
19 handbag during that trip to London?

20 A. I don't know what he did. She
21 accused me, I can't physically remember
22 buying a \$5,000 not for her, not for anyone,
23 not for me.

24 Q. Did you ever go shopping with
25 Virginia?

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2 A. I don't recall ever shopping with
3 Virginia.

4 Q. Did you have more to go over or did
5 you want me to ask my questions?

6 A. The entire characterization of what
7 took place in my house in London would have
8 been impossible.

9 Q. Can I ask, do you still have it,
10 the picture of the London town home with you
11 in it, Giuffre 00407.

12 As you are looking at this picture,
13 Ms. Maxwell, as I'm looking at it it's on the
14 right-hand side, there appears to be a
15 picture hanging on the wall, do you recall
16 that in your London town home?

17 A. It's a little difficult to see.

18 Q. Do you recall having a picture on
19 the wall there by the room where you're
20 standing?

21 A. I do have a picture.

22 Q. Do you recall on the left-hand side
23 having a railing that looks like that with
24 sort of a bubble wood top?

25 A. I do.

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2 Q. So are you saying that it's an
3 obvious lie that Virginia's statement that
4 she had sex with Prince Andrew is an obvious
5 lie?

6 A. What I'm representing is that her
7 entire ludicrous and absurd story of what
8 took place in my house is an obvious lie.

9 Q. Including she had sex with Prince
10 Andrew?

11 A. She claimed things took place in my
12 bathroom in London. Her characterizations is
13 just not possible.

14 Q. So you're saying it's an obvious
15 lie -- that she was telling an obvious lie
16 when she said she had sex with Prince Andrew?

17 MR. PAGLIUCA: Objection to the
18 form and foundation. The witness
19 answered the question.

20 A. I'm saying within the context of
21 all the stories she told, this particular
22 story -- back up, she claimed we went out at
23 night. I've already testified if -- Prince
24 Andrew is such a famous person, if he went to
25 a nightclub, it would have been reported by

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2 the press at that time. She characterized
3 that Prince Andrew drank alcohol. Prince
4 Andrew tea total.

5 She then characterized things took
6 place in my bathroom in the bathtub itself.
7 The tub is too small for any type of activity
8 whatsoever.

9 Q. Is Club Tramp the name of a London
10 club, is that a club you heard of?

11 A. It's not called Club Tramp, it's
12 called Tramp.

13 Q. That would be a club located in
14 London?

15 A. Yes.

16 Q. Are you saying that it was an
17 obvious lie when Virginia said that you made
18 her dress up in a school girl outfit?

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

21 A. I already testified that, first of
22 all, I don't know what you are taking about,
23 I already testified I didn't get her outfits
24 and all of that.

25 Q. Is it an obvious lie that Virginia

1 G Maxwell - Confidential

2 was paid to go to give a massage to Glenn
3 Dubin at the Breakers?

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

6 A. I cannot testify to what Virginia
7 did outside of -- I can't testify to what she
8 did, who she gave massages to.

9 Q. So you don't know on that one?

10 A. Of course I don't know.

11 Q. Do you agree that it's
12 psychologically harmful to have sex with a
13 minor?

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

16 A. What are you asking me?

17 Q. I'm asking if is it psychologically
18 harmful for an adult to have sex with a
19 minor?

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

22 A. I don't know what you are asking.
23 This has nothing to do with Virginia Roberts.

24 Q. It does.

25 A. How does it?

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2 Q. I ask the questions, you answer.

3 If you can't answer, you can say I don't
4 know.

5 But my question is, do you agree
6 that it's psychologically harmful to have sex
7 with a minor?

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

10 A. Are you giving me a random question
11 and as not relates to this case and not
12 relates to anything. It's obviously not
13 something that you want to have happen.

14 Q. Do you agree that Jeffrey Epstein
15 has harmed many minors by having sex with
16 them?

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

19 A. I can't testify to what Jeffrey did
20 or didn't do. I have no knowledge of what
21 you are asking me.

22 Q. If Jeffrey had sex with minors,
23 would you agree that that could harm a minor?

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

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2 A. Again, I am not testifying to what
3 Jeffrey did or did not do because I cannot.

4 Q. You don't know whether Jeffrey
5 Epstein ever had sex with a minor?

6 A. Again, I cannot testify to what
7 Jeffrey did or didn't do. I cannot.

8 Q. You never observed him having sex
9 with a minor?

10 A. I never observed Jeffrey having sex
11 with a minor.

12 Q. Do you agree that calling a sex
13 abuse victim a liar when she speaks about her
14 abuse can cause psychological harm?

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

17 A. Can you repeat the question.

18 Q. Do you agree calling a sex abuse
19 victim when she speaks about her abuse can
20 cause psychological harm?

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

23 A. Say it again.

24 Q. Do you agree that calling a sexual
25 abuse victim a liar can cause psychological

1 G Maxwell - Confidential

2 harm.

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

5 A. I would like to say all the
6 terrible things Virginia Roberts said about
7 me is extremely harmful and you should turn
8 that around. All the lies she has said and
9 you have backed her on have been extremely
10 damaging to me.

11 So what I can testify to is that
12 somebody who has made these outrageous
13 allegations and who is a serious liar and
14 that I know for a fact is a liar, that I can
15 testify is damaging to me.

16 Q. Do you agree that calling a sexual
17 abuse victim a liar when she speaks out about
18 her abuse can cause psychological harm?

19 MR. PAGLIUCA: Are you asking a
20 hypothetical question?

21 MS. McCAWLEY: Yes.

22 A. You are asking me to speculate?

23 Q. I'm not asking you to speculate .
24 If somebody is a sexual abuse victim --

25 A. I can't testify to what some random

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2 hypothetical person that you are asking me to
3 speculate on their mental state or health
4 versus speculative statement. I can't do
5 that, that's just not right.

6 Q. Do you agree that by calling
7 Virginia Roberts a liar when she was subject
8 to sexual abuse by Jeffrey Epstein can cause
9 psychological harm?

10 MR. PAGLIUCA: Objection to the
11 form and foundation. Assumes facts not
12 in evidence.

13 A. I can only tell you about what I
14 know of Virginia's lies. She lied
15 repeatedly, often and I know for a fact she
16 is a liar so I can only testify to what I
17 know and the fact that she has lied about me
18 from the beginning to the end and repeatedly
19 causes me to question anything that she may
20 feel.

21 Q. Is it an obvious lie you had sex
22 toys in Jeffrey Epstein's Palm Beach house?

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

25 A. Can you repeat the question,

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2 please?

3 Q. Is it an obvious lie that you had
4 sex toys in Jeffrey Epstein's Palm Beach
5 house?

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

8 A. Did Virginia say that?

9 Q. I'm asking you a question.

10 Is it an obvious lie that you had
11 sex toys in Jeffrey Epstein's house?

12 A. I don't recall any sex toys.

13 Q. If someone said had you sex toys,
14 would that be an obvious lie?

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

17 A. Like I said -- can you be more
18 specific about the house or whatever, what
19 exactly you are referring to, what's a sex
20 toy?

21 Q. Yes. How would you define a sex
22 toy?

23 A. No. I need you to define a sex
24 toy, I don't have enough knowledge of sex
25 toys.

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2 Q. I will define it based on the
3 dictionary's definition, which is an object
4 or device used to sexually stimulate or
5 enhance sexual pleasure.

6 A. What's your question, please?

7 Q. The question is, is it an obvious
8 lie that you had sex toys in Jeffrey
9 Epstein's Palm Beach house?

10 MR. PAGLIUCA: Same objection.

11 Q. You can answer.

12 A. Like I said, I do not have any
13 recollection of sex toys in Jeffrey's house.

14 Q. Is it a lie, is it an obvious lie
15 that you took pictures of nude girls?

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

18 A. We already covered this. Girls we
19 are not referring to -- I can only testify to
20 taking pictures of adult people and I already
21 testified they are not nude, per se. That
22 every picture that I ever took and which they
23 were very limited, always by request, the
24 people would be covered or it would be a hand
25 or a foot. There was never any pictures that

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2 I took of people would only have been
3 mainstream type magazine type photos and any
4 photos I took could have been very happily
5 and expected to be displayed on your parents'
6 mantel piece or grandparents' mantel piece.

7 Q. Is it a lie that you approached
8 females to bring them to Jeffrey Epstein?

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

11 A. Please ask the question, again.

12 Q. Sure. Is it a lie that you
13 approached females to bring them to Jeffrey
14 Epstein?

15 A. I don't know what you are asking
16 me.

17 Q. I'm asking you, if it's a lie that
18 you approached females to bring them to
19 Jeffrey Epstein?

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

22 A. You are not asking me a good
23 question, sorry.

24 Q. You don't get to choose the
25 questions.

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2 A. I would like to answer your
3 questions but you are not asking me a
4 question that I can answer.

5 Q. What about that is causing you
6 pause where you can't answer the question?

7 A. You are trying to trap me and
8 that's not fair, so I already testified that
9 I hire people across the board, so I would
10 hire architects, decorators, pool people,
11 exercise instructors, gardeners, cooks,
12 chefs, cleaning people. So I, in the course
13 of a very long time when I would hire people
14 I hired people to work for Jeffrey. So I'm
15 happy to testify to hiring people for every
16 possible conceivable proper job that you
17 could conceive of within the context of
18 Jeffrey's life and homes.

19 Q. Is it a lie that you approached
20 females to bring them to Jeffrey Epstein for
21 the purpose of performing massages?

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

24 A. Again, I have already testified
25 that part of the job that I had was to hire

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2 lots of different types of people. In terms
3 of whatever -- very small part of my job,
4 Jeffrey enjoyed getting massages. I think
5 that is something we can all agree in this
6 room and within the context of that, very
7 infrequently I would go to spas and myself
8 happily receive a professional nonsexual
9 massage from a man and/or from a woman and if
10 that massage was something that I thought was
11 something that was good, I would ask if that
12 man or woman would come back and does home
13 visits. If that person said that they did,
14 they would sometimes come, from time to time,
15 not always, come back to the house to perform
16 a nonsexual professional male or female
17 massage.

18 Q. Were any of the exercise
19 instructors you hired under the age of 18?

20 A. Again, I don't hire, we've already
21 established that I don't hire people. I
22 interview people to see if they are competent
23 in the job that they do and/or whether they
24 are someone who seemed that they can do home
25 visits.

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2 At the point where I think that
3 there is somebody that has, can be either
4 whatever the job may be, pool, gardener, chef
5 and/or exercise instructor and I think they
6 could be good at whatever it is at whatever
7 skill that they had and they did a home visit
8 which would obviously be mandatory and Mr.
9 Epstein would meet with them and decide if he
10 wanted to have whatever skill it was that he
11 would do it and then he would then either
12 have them come back or hire them.

13 Q. Were there any exercise instructors
14 that worked at the home that were under the
15 age of 18?

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

18 A. Again, I keep coming back to this,
19 that the people that I employed or -- not the
20 right word, the people I would meet to come
21 and work at the house, under any guise
22 whatsoever, again, from any of the many
23 positions that I filled, were all over --
24 were adults.

25 Q. When you say adults, over the age

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2 of 18?

3 A. I think we can establish what adult
4 would be.

5 Q. You never interviewed or I know you
6 don't want to use the word hired, whatever
7 your role was, you brought in an exercise
8 instructor that was under the age of 18 to
9 work at the house?

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

12 A. I have already testified that what
13 I was responsible for was to find people who
14 had competencies in whatever area I was
15 looking for. The competencies I was looking
16 for were professional and adult.

17 Q. So there was no exercise instructor
18 that worked at the Palm Beach house or the
19 New York house or the New Mexico house or the
20 USVI under the age of 18?

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

23 A. I can only testify to when I was at
24 the house.

25 Q. Yes.

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2 A. I can only testify to the years
3 when I was present.

4 Q. Right.

5 A. And I can also only testify to
6 people I personally either met and/or worked
7 with and/or invited, to find the correct
8 word, I don't know what the correct word is,
9 to come to do exercise or whatever it was at
10 the house.

11 Of the people that I, male and/or
12 female that I brought were all appropriate
13 and age appropriate adults.

14 Q. Over the age of 18?

15 A. We've established them as an adult.

16 Q. You are saying appropriate adults,
17 so we are clear, you didn't hire or bring in
18 or know of any exercise instructors that were
19 under the age of 18 at any of those homes?

20 A. I am also testifying that when I
21 was present at the house and with the people
22 that I brought in, were all age appropriate
23 adults.

24 Q. How do you define age appropriate
25 adults, is that over the age of 18, can we

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2 agree to that?

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

5 Q. Are they under the age of 18?

6 A. We already established that you can
7 be a masseuse in Florida at age 17. That
8 does not make it inappropriate.

9 A. I'm not saying appropriate or
10 inappropriate. I'm just asking if there were
11 any exercise instructors that were under the
12 age of 18.

13 A. I am not aware if anybody was but I
14 don't want to full out and say you oh she
15 said, we already established you can be a 17
16 year old masseuse and have it not be
17 something that is not appropriate. So when
18 you say that and then you go, well, you come
19 back and say something, now we can establish
20 that Virginia was 17 but you can be a 17 year
21 old legal masseuse, but I am not aware to
22 your point.

23 Q. Who were the other 17 year old
24 masseuses that you were aware of?

25 A. I am not aware of any.

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2 Q. Were there any 16 year year old
3 masseuse that you are aware of?

4 A. I am not aware.

5 Q. Any 15?

6 A. I just want to be clear. The only
7 person that I am aware of who claims to have
8 been a -- we have to -- we established
9 Virginia now is 17, given she has changed her
10 age so many times. The only person that I am
11 aware of that was a masseuse at the time when
12 I was present in the house was Virginia.

13 Q. Is it an obvious lie that Jeffrey
14 Epstein had a sexual preference for underage
15 minors?

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

18 A. Can you ask the question again?

19 Q. It is it an obvious lie that
20 Jeffrey Epstein had a sexual preference for
21 underage minors?

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

24 A. Can you ask the question again?

25 Q. Is it an obvious lie that Jeffrey

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2 Epstein had a sexual preference for underage
3 minors?

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

6 A. I cannot testify to what
7 Jeffrey's --

8 Q. You don't know his preference?

9 A. You handed me a stack of papers
10 from the police reports and that's what I've
11 read but I have no knowledge, direct
12 knowledge, of what you are referencing.

13 Q. So you don't know, you don't know
14 in your own mind that Jeffrey Epstein had a
15 sexual preference for underage minors, is
16 that correct?

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

19 Q. Is that correct?

20 A. Please ask the question again.

21 Q. You don't know in your own mind
22 that Jeffrey Epstein had a sexual preference
23 for underage minors?

24 MR. PAGLIUCA: Objection to the
25 form and foundation. You have to pause,

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2 let me object, answer the question.

3 Listen to her question, pause, I object,
4 you answer.

5 Q. So you don't know in your own mind
6 that Jeffrey Epstein had a sexual preference
7 for underage minors?

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

10 Q. You can answer.

11 A. I cannot tell you what Jeffrey's
12 story is. I'm not able to.

13 Q. Did Jeffrey Epstein have a scheme
14 to recruit underage girls to use them for
15 purposes of sexual massages?

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

18 A. Can you ask me again, please?

19 Q. Did Jeffrey Epstein have a scheme
20 to recruit underage girls to recruit them for
21 sexual massages?

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

24 A. Can you ask it a different way?

25 Q. Did Jeffrey Epstein have a scheme

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2 to recruit underage girls for sexual
3 massages?

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

6 Q. If you know.

7 A. I don't know what you are talking
8 about.

9 Q. Is it an obvious lie that Virginia
10 Giuffre was a minor the first time she was
11 taken to Jeffrey Epstein's house?

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

14 A. So we've already established that
15 Virginia was 17 and we have established that
16 her mother brought her to the house and that
17 she came as a masseuse, age 17, which is
18 legal in Florida.

19 Q. Would Jeffrey Epstein's assistants
20 arrange times for underage girls to come to
21 the house for sexual massages?

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

24 A. What are you talking about?

25 Q. Sure. Would Jeffrey Epstein's

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2 assistants, I think earlier you mentioned, we
3 talked about Sarah Kellen who worked in the
4 role as an assistant or Nadia Marcinkova.
5 Would Jeffrey Epstein's assistants arrange
6 times for underage girls to come over the
7 house for sexual massages?

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

10 A. Again, I read the police reports so
11 this is all happening according to the police
12 reports when I am no longer at the house so I
13 can't testify to what Jeffrey's assistants
14 did when this kind of activity as alleged in
15 the reports.

16 Q. So you don't know?

17 A. No.

18 Q. Would Jeffrey Epstein's assistants,
19 meaning Sarah Kellen, Nadia Marcinkova or any
20 other assistant that you are aware of from
21 the time you worked there take nude
22 photographs of underage girls?

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

25 A. During what period of time?

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2 Q. During any period of time you
3 worked, did you observe that?

4 A. I did not observe any such
5 photographs.

6 Q. Are you aware if they took those
7 kinds of photos?

8 A. I am not aware.

9 MR. PAGLIUCA: Can we take a
10 five-minute break.

11 THE VIDEOGRAPHER: It's 2:58 and we
12 are off the record.

13 (Recess.)

14 THE VIDEOGRAPHER: It's now 3:10.
15 We're starting disk No. 6 and we are
16 back on the record.

17 Q. Ms. Maxwell, was it an obvious lie
18 when Virginia said she was sent to Thailand
19 by Epstein in September of 2002?

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

22 A. I have no knowledge of Virginia
23 being sent to Thailand.

24 But may I say something?

25 Q. There is not a question pending

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2 unless you want to clarify something.

3 Did you want to clarify that?

4 A. No, I just wanted to say something.

5 Q. Is it an obvious lie when Virginia
6 said she was given instructions to maintain
7 telephone contact with you while she was in
8 Thailand?

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

11 A. Can you repeat the question?

12 Q. Is it an obvious lie when Virginia
13 said she was given instructions to maintain
14 telephone contact with you when she was in
15 Thailand?

16 MR. PAGLIUCA: Same objection.

17 A. I have no idea what instructions
18 Virginia was given, if any, when she went to
19 Thailand.

20 Q. So you know she went to Thailand?

21 A. I know she claimed she went to
22 Thailand from having read it but given that
23 she lied about everything it's hard to know
24 what is true and not true.

25 Q. Would it make any sense for her to

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2 be in contact with you, would there be any
3 reason why she needed to be in contact with
4 you?

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

7 A. When are we talking about?

8 Q. When she went to Thailand.

9 MR. PAGLIUCA: Same objection.

10 Q. In 2002, would there be any reason
11 for her to remain in contact with you?

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

14 A. Can you ask the question again,
15 please?

16 Q. Would there be any reason for
17 Virginia to maintain contact with you in 2002
18 when she went to Thailand?

19 MR. PAGLIUCA: Same objection.

20 A. First of all, I didn't know that
21 she went to Thailand. I had had nothing to
22 do with her trip to go to Thailand and there
23 would absolutely no reason for her to be in
24 touch with me, whatsoever.

25 Q. Did you ever have a phone number

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2 that was [REDACTED]

3 A. I did.

4 Q. Was that a cell phone number?

5 A. Yes.

6 Q. Is that your current cell phone
7 number?

8 A. Yes.

9 Q. I'm going to mark a couple of
10 things here?

11 (Maxwell Exhibit 11, photos, marked
12 for identification.)

13 THE WITNESS: Can I say something
14 now?

15 MR. PAGLIUCA: No.

16 THE WITNESS: Will you let me know
17 when I can?

18 MR. PAGLIUCA: When she asks you a
19 question:

20 Q. So we've marked this as Exhibit 11.
21 I'm showing you what's been marked as Exhibit
22 11 which is Giuffre 003191 and 003192.

23 Can you take a look at that
24 document for me. Is that number that you
25 just identified the [REDACTED] as being

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2 your cell phone number, is that number on
3 this document?

4 A. It is.

5 Q. And do you know who authored this
6 document?

7 A. I do not.

8 Q. Who is JoJo?

9 A. I don't know who JoJo is on this
10 document because I don't know what this
11 document is.

12 Q. Do you know someone by the name of
13 JoJo?

14 A. I do know someone by the name of
15 JoJo.

16 Q. Would he know your phone number?

17 MR. PAGLIUCA: Object to the form.

18 A. I have to idea.

19 Q. Why would Virginia be instructed to
20 call Ms. Maxwell at your number on this form?

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

23 A. I don't know what this document is.
24 I don't know when it was done, I don't know
25 anything about it other than I can see it has

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2 my name and my number on it.

3 Q. So JoJo -- you said JoJo -- is he
4 employed by Mr. Epstein?

5 A. Again, it is not the only one JoJo
6 on the planet.

7 Q. I understand.

8 Do you know a JoJo that is employed
9 by Mr. Epstein?

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

12 A. Can you ask me the question again?

13 Q. Do you know someone by the name of
14 JoJo that was employed by Mr. Epstein back in
15 2002?

16 A. I do know somebody who was employed
17 by Mr. Epstein known as JoJo.

18 Q. Do you recognize the other numbers
19 listed at the top of this document?

20 A. I do not.

21 Q. Would you have known JoJo's cell
22 number at that time in 2002?

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

25 A. I have no idea.

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2 Q. Can I ask you to turn to the next
3 page, please.

4 Do you know who Nantimda Tharanese
5 is who is mentioned on this document?

6 A. I do not.

7 Q. If you look on the bottom lines of
8 the document, it says, Still in Thailand
9 during your stay, if she is, she will be
10 staying at the same hotel.

11 Do you recall ever giving Virginia
12 instructions to meet a girl in Thailand?

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

15 A. I have already testified that I
16 didn't even know that Virginia was going to
17 Thailand.

18 Q. So you didn't give her instructions
19 to meet a girl in Thailand?

20 A. Like I said, I didn't even know she
21 was going to Thailand.

22 Q. Do you know whether Jeffrey Epstein
23 would have given her instructions to meet a
24 girl in Thailand?

25 MR. PAGLIUCA: Objection to the

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2 form and foundation.

3 A. I cannot possibly tell you what
4 Jeffrey did or didn't do. I wouldn't know.

5 Q. Do you know whether Jeffrey Epstein
6 paid for Virginia to go to Thailand?

7 A. Again, I wouldn't know if he did.
8 (Maxwell Exhibit 12, documents,
9 marked for identification)

10 Q. I'm going to direct -- you can take
11 a look at it and then I'm going to direct
12 your attention to a couple of pages.

13 MR. PAGLIUCA: So the record should
14 be clear, this exhibit which is 12 is
15 375, 6, 7, 8, 9, 80, 1, and then skips
16 to 919, 920, 921, 922, 923, 924, 925 and
17 926.

18 Q. So I'm going to direct your
19 attention to the first page, have you ever
20 traveled with Jeffrey Epstein where you've
21 received a document like this from Shoppers
22 Travel in your own independent travel.

23 Do you recognize this?

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

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2 Q. The front form, the front page, do
3 you recognize this Shopper Travel form, have
4 you ever used them as a travel agent with
5 Jeffrey Epstein?

6 MR. PAGLIUCA: Same objection.

7 Q. You can answer.

8 A. I don't recognize this.

9 Q. Turning to the second page which is
10 the 00376, do you see at the top of that
11 document where it says Jeffrey Epstein, J.
12 Epstein 457 Madison Avenue 4th floor New York
13 New York.

14 Is that an address you are familiar
15 with that is Jeffrey Epstein's?

16 A. I am.

17 Q. Do you see below that, travel on
18 Singapore Airlines, and you are going to have
19 to go from New York JFK to Singapore Bangkok.

20 Do you see that?

21 MR. PAGLIUCA: What?

22 Q. The first entry is going to be on
23 September 27, New York.

24 MR. PAGLIUCA: I see it.

25 MS. McCAWLEY: I'm not talking to

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2 you. I'm talking to the witness.

3 A. I see it.

4 Q. To Singapore Bangkok?

5 A. Singapore Bangkok I'm afraid are
6 not the same place.

7 Q. Singapore, then Bangkok:

8 Q. I'm going to turn you to page
9 Giuffre, it's a little further back 000919.
10 And do you see at the top where it says J.
11 Epstein, underneath, Royal Princess, change
12 mine?

13 A. I do.

14 Q. Does this refresh your recollection
15 that Virginia Roberts' trip to Thailand was
16 paid for by Jeffrey Epstein?

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

19 A. I can only testify to the piece of
20 paper you showed me that has that
21 information. I cannot testify from direct
22 memory.

23 Q. When Virginia was traveling to
24 Thailand, which the dates, again, I'm going
25 to refer you back to the first page so you

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2 can see the dates.

3 MR. PAGLIUCA: Can you identify a
4 Bates number, please.

5 Q. [REDACTED] which was at the top says,
6 [REDACTED] I'm going to refer you,
7 at the same time, to the flight logs which
8 were marked, the thicker document that looks
9 like this with all the log entries on it.
10 I'm going to refer you to page --

11 MR. PAGLIUCA: That's Exhibit No.
12 6, correct? I'm trying to keep the
13 record straight.

14 MS. McCAWLEY: I don't have Exhibit
15 numbers on mine. That's Giuffre [REDACTED]

16 MR. PAGLIUCA: Hang on one second.

17 A. Can you repeat the number please.

18 Q. [REDACTED] And if you will look on
19 that page at the entry, under [REDACTED]
20 [REDACTED] starting with the [REDACTED] and then it runs
21 down to the, looks like the [REDACTED] that first
22 entry has President Clinton, Kevin Spacey,
23 Chris Tucker, Jeffrey Epstein and the
24 initials GM.

25 Do you remember taking a trip with

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2 President Clinton during [REDACTED]

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

5 A. Can you repeat the question,
6 please?

7 Q. Do you remember taking a trip with
8 President Clinton during [REDACTED]
9 that's the [REDACTED] it looks like, through the
10 [REDACTED]

11 A. I don't remember the dates. I
12 couldn't testify to when we actually did it
13 but I do remember the trip itself.

14 Q. So you were traveling with Jeffrey
15 Epstein and President Clinton at the same
16 time Virginia was headed to Thailand, is that
17 correct?

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

20 A. I don't know, is that right?

21 Q. If you look at [REDACTED] on the
22 document that I gave you, the first document
23 and then you referred to, if you look in the
24 same as above lines, you will see the travel
25 group with President Clinton?

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2 MR. PAGLIUCA: Are you asking her
3 to compare the documents or are you
4 asking her what her personal knowledge
5 is.

6 MS. McCAWLEY: I'm asking if she can
7 look at the doubts and tell me if she
8 recalls that she traveling with
9 President Clinton at the same time this
10 document reflects Virginia was in
11 Thailand.

12 A. I can't testify to any dates. I
13 couldn't tell you. I can see a date and I
14 can see a date but I can't tell you that I
15 have a memory of the dates. I have a memory
16 of the trip, I don't have a memory of the
17 time.

18 Q. Who is [REDACTED]?

19 A. [REDACTED].

20 Q. What is her address?

21 A. I don't know.

22 Q. Does she live in the United States?

23 A. She does.

24 Q. In what state?

25 A. I believe in New Jersey somewhere.

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2 Q. Do you have her phone number?

3 A. Not memorized.

4 Q. Do you have the ability to get her
5 phone number?

6 A. Of course.

7 Q. Has she ever asked -- has [REDACTED]
8 [REDACTED] ever asked other girls to come over to
9 see Jeffrey Epstein for the purpose of a
10 sexual massage?

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

13 A. Can you ask the question again
14 please.

15 Q. Has [REDACTED] ever asked girls to
16 come over to see Jeffrey Epstein for the
17 purpose of a sexual massage?

18 MR. PAGLIUCA: Object to form and
19 foundation.

20 A. Can you ask again, please?

21 Q. Has [REDACTED] ever asked girls to
22 come over to see Jeffrey Epstein for the
23 purpose of sexual massage?

24 A. I have no personal knowledge.

25 Q. What does [REDACTED] do for you?

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2 A. She helps with my not-for-profit
3 ocean foundation and any other related
4 activities that I may have.

5 Q. Is she paid for by Jeffrey Epstein?

6 A. No.

7 Q. She is paid for by you?

8 A. Yes.

9 Q. When did you first meet [REDACTED]

10 [REDACTED]

11 A. I don't recollect exactly, sometime
12 maybe 2002, 2003.

13 Q. How did you meet her?

14 A. I don't recollect exactly how we
15 met.

16 Q. Did Jeffrey introduce you to her?

17 A. I don't recollect how we met.

18 Q. Does she know Jeffrey Epstein?

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

21 A. Can you ask again, please?

22 Q. Does [REDACTED] know Jeffrey
23 Epstein?

24 A. What do you mean by know?

25 Q. Has she met her him before?

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

4 A. I can't recollect a time when
5 [REDACTED] -- I've seen [REDACTED] with Jeffrey but --

6 Q. You are not sure --

7 A. I know they know either other. I
8 can't testify to a meeting between them.

9 Q. Do you know where in New Jersey she
10 lives?

11 A. No

12 Q. You don't know a city?

13 A. No.

14 Q. How long has she worked for you?

15 A. Sometime 2002, 2003.

16 Q. To the present?

17 A. Yeah.

18 Q. Why do you think that [REDACTED]
19 might know Jeffrey?

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

22 A. Because you know, I know Jeffrey.

23 Q. Have you seen them together?

24 A. I already testified I have not seen
25 them together, to my recollection.

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2 Q. Is it your testimony that [REDACTED]
3 [REDACTED] knows Jeffrey Epstein through the work
4 that she does for you?

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

7 A. I don't recollect, and I don't
8 recollect how I met [REDACTED] and I can't testify
9 to what [REDACTED] relationship is or is not with
10 Jeffrey.

11 Q. Have you ever talked to Jeffrey
12 about [REDACTED]

13 A. I don't know what you mean.

14 Q. In any way, have you ever had a
15 conversation with Jeffrey about [REDACTED]?

16 A. In what context.

17 Q. In any context. Have you ever
18 talked to Jeffrey Epstein about [REDACTED]?

19 A. [REDACTED] works for me so it's entirely
20 possible that in the course of conversations
21 since 2002, 2003 that a conversation in which
22 [REDACTED] name would have come up is entirely
23 possible.

24 Q. I provided you with and I'm sorry,
25 I don't know all the numbers, but the

1 G Maxwell - Confidential
2 statement that was issued by Ross Gow that
3 should be a single page still in your stack
4 of exhibits there.

5 MR. PAGLIUCA: Exhibit 10.

6 Q. Did you authorize Ross Gow to issue
7 that statement on your behalf in January of
8 2015?

9 A. I already testified that that was
10 done by my lawyers.

11 Q. So did you authorize your lawyers
12 to issue a statement on your behalf through
13 Ross Gow in January of 2015?

14 A. It was determined that I had to
15 make a statement in the United Kingdom
16 because of the appalling lies and I just
17 thought of some new ones.

18 Virginia's statement that I
19 celebrated her 16 birthday with her. We can
20 all agree that that's entirely impossible. I
21 didn't meet her until she was 17 and other
22 lies she perpetrated that she had a diary and
23 we all know is a complete fake. That's not a
24 diary. It was just a book she was writing
25 that you helped sell to the press, as if it

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2 was a diary, when it was just a story that
3 she is writing of fiction, fictional story
4 for money.

5 Q. How did you arrive at the words
6 that were put in that statement?

7 MR. PAGLIUCA: I'm going to object
8 and instruct you to the extent this
9 calls for any privileged communications
10 between yourself and Mr. Barden or
11 another lawyer representing you, we're
12 asserting privilege. If you can answer
13 that without that, feel free to answer.

14 Q. So what your counsel is saying, and
15 I will exclude any privileged communications
16 you had with your lawyers.

17 The question is, how did you arrive
18 at the words that were put in that statement,
19 if you can tell me without disclosing
20 privileged communications?

21 A. I'm not sure that I can.

22 Q. Is the statement that you issued
23 true?

24 A. What do you mean by that?

25 Q. Is the statement that you issued,

1 G Maxwell - Confidential

2 the statement that's in front of you, is it a
3 true statement?

4 A. As in that Virginia is a liar?

5 Q. The words you put in there, is that
6 true?

7 A. Of course they're true.

8 Q. When did you become aware that the
9 statement was being released?

10 A. I don't recollect exactly.

11 Q. What day it was?

12 A. No.

13 Q. I'm sorry. Did you identify, I
14 might not have caught it, did you identify
15 the name of the lawyer that you said you
16 retained for purposes of this statement?

17 A. I think Philip Barden.

18 Q. Did you pay that lawyer Philip
19 Barden?

20 A. Yes.

21 Q. Are you aware of any interstate or
22 international transportation of a woman aged
23 18 to 28 for the purposes of prostitution?

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

1 G Maxwell - Confidential

2 A. I'm not sure I even understand your
3 question.

4 Q. I will go slower.

5 Are you aware of any interstate,
6 meaning between states, or international,
7 meaning oversees transportation, of women
8 aged 18 to 28, for the purposes of
9 prostitution?

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

12 A. Are you asking -- I'm still not
13 sure I understand the question.

14 Q. I will try to make it clearer.

15 I'm asking you if you are aware of
16 any interstate, meaning between states, or
17 international transportation, meaning by
18 flight or by car or by train, of women aged
19 18 to 28, their ages are between the ages of
20 18 and 28, for the purposes of prostitution?

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

23 A. In the world I'm sure that that
24 happens, I read about it all the time.

25 Q. Not in the world. Are you aware of

1 G Maxwell - Confidential
2 it, in your experience with Jeffrey Epstein,
3 of any interstate or international
4 transportation of women aged 18 to 28, for
5 the purposes of prostitution?

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

8 A. So whilst I appreciate this might
9 not seem like a smart question, what do you
10 mean by prostitution, what are you asking me
11 exactly?

12 Q. That would be sex for hire, any
13 kind of sexual act that's paid for.

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

16 A. Who's paying, what are you asking
17 me.

18 Q. It can be paid for by anybody.
19 It's a sexual act that's paid for.

20 I'm asking if you are aware of any
21 interstate or international transportation of
22 women aged 18 to 28, for the purposes of
23 prostitution?

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

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2 A. I have no idea what you are talking
3 about.

4 Q. So you are not aware of that?

5 A. No.

6 Q. Are you aware of any interstate or
7 international transportation of women, aged
8 18 to 28, for the purposes of having sex with
9 Epstein where they would receive compensation
10 of any type?

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

13 A. I don't know what you are referring
14 to.

15 Q. Do you want me to repeat the
16 question?

17 A. Sure, go ahead.

18 Q. Are you aware of any interstate or
19 international transportation of woman, aged
20 18 to 28, for the purpose of having sex with
21 Jeffrey Epstein where they would receive
22 compensation of any type?

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

25 A. I am not aware of what you are

1 G Maxwell - Confidential

2 talking about.

3 Q. Are you aware of any interstate or
4 international transportation of women, aged
5 18 to 28, for the purposes of providing a
6 massage for Jeffrey Epstein?

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

9 A. So I you need to repeat that
10 question for me.

11 Q. Sure.

12 Are you aware of any interstate,
13 meaning between states, or international,
14 oversees, transportation of women, aged 18 to
15 28, for the purposes of providing massage for
16 Jeffrey Epstein?

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

19 A. I think we can agree he did travel
20 from time to time with a professional adult
21 masseuse.

22 Q. Are you aware of any interstate or
23 international transportation of women, aged
24 18 to 28, for the purposes of providing a
25 massage to any person other than Jeffrey

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2 Epstein?

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

5 A. Again, I'm not aware of anybody
6 that, if you are asking for specifics to
7 someone else, I have no knowledge of that.

8 Q. So you are not aware of any
9 interstate or international transportation of
10 a woman aged 18 to 28 for the purposes of
11 providing a massage to any person other than
12 Jeffrey Epstein?

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

15 A. I don't recall what any single
16 person being on a plane for a massage with
17 someone else other than Jeffrey, for the sole
18 purpose, if that's the question, I don't have
19 any recollection of that.

20 Q. Earlier in your testimony, you
21 stated that Virginia Roberts was 17 at the
22 time you met her.

23 How do you know she was 17?

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

1 G Maxwell - Confidential

2 that calls for a privileged response,
3 I'm instructing you not to answer.

4 Q. How do you know Virginia Roberts
5 was 17 at the time you met her?

6 MR. PAGLIUCA: Again, if you
7 learned that information from your
8 lawyer, I'm instructing you not to
9 answer.

10 A. I will follow my counsel's advice.

11 Q. Are you able to answer that
12 question without telling me information you
13 learned from a lawyer?

14 A. I'm not.

15 Q. So you don't have independent
16 knowledge that Virginia, according to your
17 statement, was 17 at the time you met her?

18 A. Again, my lawyer has instructed me
19 not to answer.

20 Q. I'm asking you a different
21 question. Whether you have any independent
22 knowledge, outside your lawyers, that
23 Virginia was 17 at the time you met her?

24 A. Following the instructions of my
25 lawyers, I can only remember or testify to

1 G Maxwell - Confidential

2 what she --

3 MR. PAGLIUCA: She is asking you a
4 different question. She is asking other
5 than what your lawyers have told you, do
6 you have any knowledge about her being
7 17, that's what she is asking.

8 A. I can't recollect where I got all
9 the information that I have that definitively
10 shows that.

11 Q. Earlier in your testimony, I
12 believe you said all of us would know that
13 Virginia was 17 at the time you met her.

14 How would we know that?

15 A. I think you know that by her own
16 dates, now that it was in 2000, so her entire
17 trail of me celebrating her 16th birthday is
18 clearly another giant falsehood.

19 Q. But she was 16 and 17 that year,
20 wasn't she?

21 A. Which year?

22 Q. You said it was 2000.

23 A. I think the information that I have
24 that indicates that definitively was
25 something that is privileged, so I can't

1 G Maxwell - Confidential

2 share with you.

3 Q. So you have privileged information
4 that definitively tells you that she was 17
5 at the time you met her?

6 A. I believe I do.

7 Q. How would we know that?

8 A. What are you asking me?

9 Q. Earlier today you testified that we
10 would know that she was 17 at the time that
11 you met her.

12 How would we know that?

13 A. I imagine you have access to
14 exactly the same information that I do.

15 Q. What is that information?

16 A. Again, it's privileged, I can't
17 share it with you but you have been on this
18 case for, I don't know, much much longer than
19 I have and I imagine you have all the
20 information that I do.

21 Q. Do you know whether your lawyers
22 have produced documents from you that would
23 show the age that Virginia was at the time
24 that you met her?

25 MR. PAGLIUCA: To the extent that

1 G Maxwell - Confidential
2 calls for a communication that you had
3 with one of your lawyers, I'm
4 instructing you not to answer that
5 question.

6 Q. I assume you, as part of the
7 discovery process, had to collect documents
8 that were relevant to this action, is that
9 correct?

10 A. I did.

11 Q. Did you collect documents that
12 would show that Virginia was 17 at the time
13 that you met her?

14 A. I think you have everything that
15 relates, that I had, contemporaneously per
16 what you asked for that I have that relates
17 to that.

18 Q. Did you have a document that
19 identified that Virginia was 17 at the time
20 that you met her?

21 A. You have all of the documents that
22 I had.

23 Q. I'm not asking what documents. I'm
24 asking, do you have a document that
25 identifies Virginia being 17 at the time you

1 G Maxwell - Confidential

2 met her?

3 A. You have every document that I
4 have. You have seen every document that I
5 have.

6 Q. That's not what I'm asking.

7 A. I don't recall every document that
8 I gave you, so I don't know. I would have to
9 look at every single document I gave you and
10 then review it but as I recall you have every
11 document that I have.

12 Q. What are you planning to show the
13 jury that will prove that Virginia was 17
14 when you met her?

15 A. Again that's privileged so I can't
16 share that with you.

17 Q. If you're showing the jury, it
18 wouldn't be privileged, so is there a
19 document you have produced in this matter
20 that shows that Virginia was 17 at the time
21 you met her?

22 MR. PAGLIUCA: She answered that
23 question already. She said she doesn't
24 know, she has given you everything. If
25 there is a decision -- assuming for the

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2 moment there is such a document, just
3 hypothetically, and assuming for the
4 moment that it is going to get produced
5 somewhere, if it hasn't already been
6 produced, obviously that would involve a
7 waiver, a future waiver of the
8 privilege. I think that's the answer to
9 the question.

10 Q. Has the document been produced, do
11 you know?

12 A. You have everything that I have
13 given you, so if you can't -- if it's not in
14 those documents, I don't know what to tell
15 you.

16 Q. Your lawyers haven't withheld any
17 documents?

18 A. They are right here. You can ask
19 them.

20 Q. I'm asking you.

21 A. I don't know what -- they're
22 lawyers.

23 Q. When we were talking earlier about
24 Prince Andrew, I asked you whether you had
25 ever given him a gift of a puppet.

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2 Did you ever, not as a gift, did
3 you ever see in the presence of Prince Andrew
4 a puppet?

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

7 A. Can you be more direct, please?

8 Q. Sure. Were you ever in a room with
9 Prince Andrew where there was a puppet?

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

12 A. Can you be more specific please and
13 can you bound it by time and be more
14 specific, whatever you are actually asking
15 me?

16 Q. Were you ever in a room with Prince
17 Andrew in New York in Jeffrey Epstein's home
18 where there was a puppet?

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

21 A. What sort of puppet are you asking
22 me?

23 Q. Any kind of puppet?

24 A. You need to be more descriptive. I
25 don't know what you mean by puppet, there is

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2 hand puppets, all sorts of puppets.

3 Q. Is there any puppet you've ever
4 seen in Jeffrey Epstein's home in the
5 presence of Prince Andrew?

6 A. Again, puppet, you know, there is
7 lots of types of puppets.

8 Q. Any type of puppet.

9 A. If you want to give me a
10 description of the puppet, I would be perhaps
11 be able to say.

12 Q. Any type of puppet?

13 A. Can you be more detailed?

14 Q. Have you ever seen a puppet in
15 Jeffrey Epstein's home in the presence of
16 Prince Andrew?

17 A. My understanding of a puppet is a
18 small handheld item you have in a circus. I
19 have never seen that.

20 Q. Have you ever seen a puppet which
21 is defined as a movable model of a person or
22 animal that is used in entertainment and
23 typically moved either by strings or
24 controlled from above or by a hand inside it?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I have not seen a puppet that fits
4 exactly that description.

5 Q. Have you seen any puppet that fits
6 any description?

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

9 A. Can you reask the question, please?

10 Q. Yes.

11 Have you seen any puppet that fits
12 any description in the presence of Prince
13 Andrew in Jeffrey Epstein's home?

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

16 A. I am not aware of any small
17 handheld puppet that was there. There was a
18 puppet -- not a puppet -- there was a -- I
19 don't know how would you describe it really,
20 I don't know how would you describe it. Not
21 a puppet, I don't know how you would describe
22 it. A caricature of Prince Andrew that was
23 in Jeffrey's home.

24 Q. Did you use that caricature to put
25 the hand of the caricature on Johanna

1 G Maxwell - Confidential

2 Sjoberg's breast?

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

5 A. I don't recollect. I recollect the
6 puppet but I don't recollect anything around
7 the puppet. You characterized puppet, I
8 characterize it as, I don't know, as a
9 characterization of Andrew.

10 Q. Do you recollect asking Virginia
11 Roberts to sit on Prince Andrew's lap with
12 the caricature of Prince Andrew?

13 A. I do not recollect that.

14 Q. What do you remember about the
15 caricature of the Prince Andrew caricature
16 when you were in the presence of Prince
17 Andrew, Virginia Roberts and Johanna Sjoberg?

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

20 A. I don't recollect the story as told
21 by Johanna or Virginia. I don't even know
22 who -- I remember the caricature of Prince
23 Andrew and I remember Prince Andrew but I
24 don't recall anything else around the
25 caricature.

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2 Q. Did you give it to him?

3 A. I did not.

4 Q. Who gave it to him?

5 A. I don't think it was given to him
6 at all.

7 Q. Did he bring it?

8 A. No.

9 Q. Was it something that was at the
10 house?

11 A. As best I recollect.

12 Q. Was it something that you saw at
13 the house in advance of Prince Andrew's
14 arrival?

15 A. Again, I don't real -- I recollect
16 the caricature, I recollect Prince Andrew, I
17 don't recollect much else around the
18 caricature.

19 Q. Was there a party going on in the
20 house at the time you recollect the
21 caricature?

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

24 A. You have to be way more specific?

25 Q. Do you remember, you said you

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2 recollect this caricature, you recollect
3 Prince Andrew being there. Do you recollect
4 a party going on at the time of that
5 interaction with Prince Andrew and the
6 caricature?

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

9 A. I don't recollect a party -- first
10 of all, they weren't really parties -- I
11 don't recollect a party -- I don't know what
12 you mean by party in the context of that
13 scenario.

14 Q. Who do you recollect being at the
15 home during the time Prince Andrew was there
16 with this caricature?

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

19 A. I only recollect myself with Prince
20 Andrew, I don't recollect anybody else.

21 Q. You don't recollect Jeffrey Epstein
22 being there?

23 A. Actually, no.

24 Q. You don't recollect Johanna Sjoberg
25 being there?

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2 A. No.

3 Q. You don't recollect Virginia
4 Roberts being there?

5 A. No.

6 Q. It was just you and Prince Andrew?

7 A. I am not saying it was just me and
8 Prince Andrew, you are asking me do you
9 remember. I only remember Prince Andrew, I
10 remember Prince Andrew and the caricature but
11 I can't place the caricature and everybody
12 else in the same context, the same timeframe
13 you are asking me.

14 Q. Would Prince Andrew typically
15 travel with Secret Service or some sort of
16 security when he would come to visit you and
17 Jeffrey in New York?

18 A. Typically he would have somebody.

19 Q. Would they be in the house or
20 outside of the house? Would they usually
21 stay in the house or outside of the house, in
22 other words guarding the doors or would they
23 come inside?

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

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2 A. Typically, there is no typical
3 because there is no standard procedure, so I
4 can't comment or testify to what secret
5 service would or wouldn't do.

6 Q. Do you remember them being in the
7 house?

8 A. Not specifically.

9 Do you mind if I take a bathroom
10 break.

11 THE VIDEOGRAPHER: It's now 3:51
12 and we are off the record.

13 (Recess.)

14 THE VIDEOGRAPHER: It's now 4:04.
15 We are back on the record and we're
16 starting disk No. 7.

17 Q. Ms. Maxwell, during what time
18 period, I know you said, I believe you said
19 you met Jeffrey in 1991, if I'm correct there
20 and you've known him through the present.

21 During what time period within
22 those years would you say your relationship
23 was the closest with Jeffrey?

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

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2 A. What do you mean by close, sorry.

3 Q. I think earlier today you testified
4 that at some point in time you considered
5 yourself to be his girlfriend, is that the
6 closest you would say that your relationship
7 was with him and if so, what time period was
8 that?

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

11 A. I don't think I said I was his
12 girlfriend, I would like to think of myself
13 as maybe, I don't think I -- sometime in the
14 mid '90s.

15 Q. How close was your relationship?

16 A. We were very friendly.

17 Q. Without going into details, was
18 your relationship with him intimate?

19 A. Yes.

20 Q. When was the last time you had
21 contact with Jeffrey Epstein?

22 A. What do you mean by contact.

23 Q. Either a phone call or email or
24 anything of that nature?

25 A. As best as I can recollect when

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2 all -- sometime last year.

3 Q. So you haven't talked to him like,
4 for example, last week you didn't talk to
5 him?

6 A. I did not.

7 Q. How many times have you had either
8 direct or indirect, meaning, in the presence
9 of him or calling or emailing, contact with
10 Jeffrey Epstein from December 30, 2014 until
11 now?

12 A. I'm sorry, can you just --

13 Q. Either in person or by phone or by
14 email, from December 30, 2014 until present.

15 A. I can't really characterize that
16 but not very much. There was a period when
17 in January when you filed your, whatever you
18 filed, where we spoke and then, since then
19 not much at all.

20 Q. Can you estimate how many emails
21 you would have sent Jeffrey from the period
22 of December 30, 2014 to the present?

23 A. Not very many at all.

24 Q. More than 20?

25 A. I really wouldn't be able to

1 G Maxwell - Confidential

2 characterize it because it wouldn't be that
3 many. I wouldn't know.

4 Q. More than 50?

5 A. It would be on the lesser side, not
6 on the more side.

7 Q. Can you give me a number?

8 A. I honestly couldn't. I would be
9 guessing.

10 Q. How many emails has Jeffrey sent
11 you from the period December 30, 2014 to the
12 present?

13 A. I would say less emails, even less
14 emails than I sent him.

15 Q. More than 20?

16 A. I would say on the lesser side.

17 Q. Less meaning 10?

18 A. I really can't recall, very little.

19 Q. When you spoke with Jeffrey in
20 January of 2015, what did he say to you?

21 A. I really couldn't remember exactly
22 what he said to me.

23 Q. Did you talk about Virginia
24 Roberts?

25 A. I'm sure we did but I couldn't

1 G Maxwell - Confidential

2 recall the exact conversation.

3 Q. Does Jeffrey Epstein send you text
4 messages?

5 A. No.

6 Q. Do you send him text messages?

7 A. No.

8 Q. How many phone calls have you had
9 with Jeffrey Epstein since December 30, 2014?

10 A. Again, very few.

11 Q. More than five?

12 A. Probably as many as the few emails
13 that I would characterize, so just very few.
14 I mean a small number.

15 Q. Are you aware of any disagreement
16 between your views about Virginia Roberts and
17 Jeffrey's views about Virginia Roberts?

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

20 A. I cannot speculate to his views. I
21 can only testify on my views.

22 Q. Earlier you went through the series
23 of lies. Have you talked to Jeffrey about
24 the lies and does he agree with you?

25 A. I have discussed some of the issues

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2 with him, I can't remember specifically which
3 ones. I just don't recall. I'm sorry.

4 Q. Do you recall him telling you that
5 he didn't agree with you on any of those?

6 A. I don't recall him saying that.

7 Q. Do you have a joint defense
8 agreement with Jeffrey Epstein?

9 A. I believe I do.

10 Q. Do you have a joint defense
11 agreement with Alan Dershowitz?

12 A. I don't believe I do.

13 Q. Earlier today in your testimony,
14 when I was asking you some questions, you
15 said that you couldn't answer but that
16 Jeffrey Epstein could answer that question.

17 Would Jeffrey Epstein be in a
18 position to confirm or deny some of the
19 obvious lies that we've discussed today?

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

22 A. I can't possibly testify to what
23 Jeffrey could or would say. I can't speak
24 for him.

25 Q. Would Jeffrey be able to confirm or

1 G Maxwell - Confidential

2 deny whether he had sex with Virginia
3 Roberts?

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

6 A. I can't say what Jeffrey would say.

7 Q. Has he discussed that with you?

8 A. He has not.

9 Q. Would Jeffrey be able to confirm or
10 deny whether he had a sexual massage from
11 Virginia that first time she came to his
12 mansion in Palm Beach?

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

15 A. I cannot speak for what he would
16 say. I can only speak for what I would say.
17 So as I testified everything that she said
18 about that first meeting didn't happen so...

19 Q. Has he told that you everything
20 about that first meeting didn't happen?

21 A. I know it didn't happen because she
22 put me in that room.

23 Q. I understand you know. But has
24 Jeffrey said when you are talking about the
25 obvious lies, oh yeah, that never happened?

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

4 A. I can't specifically recall that.
5 I don't know, but he has to agree with me
6 because it didn't happen.

7 Q. Can Jeffrey Epstein, would he be
8 able to confirm or deny whether he had sex
9 with underage girls?

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

12 A. I can't testify to what Jeffrey
13 would say.

14 Q. Can Jeffrey confirm or deny whether
15 Bill Clinton was on Jeffrey's island?

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

18 A. I can't say what Jeffrey would say.
19 I can only say what I know to be true.

20 Q. Has Jeffrey talked to you about the
21 fact whether Bill Clinton was on his island?

22 A. As best as I can recollect, he said
23 he was not on the island. As best as I can
24 recollect.

25 Q. Can Jeffrey Epstein confirm whether

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2 he and Virginia Roberts were together in the
3 presence of Prince Andrew?

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

6 A. I can't speak to what Jeffrey would
7 say.

8 Q. Has he talked to about Virginia
9 Roberts' statement that she was in the
10 presence of Prince Andrew?

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

13 A. I have not discussed individual
14 presences with Virginia. That's not -- I'm
15 only concerned with what I know to be the
16 stuff about me. So my focus has always been
17 the lies and the obvious lies as something I
18 can personally attest to. I cannot possibly
19 talk for anything else.

20 Q. Has Jeffrey Epstein said to you
21 anything along the lines of Virginia is lying
22 when she says she met Prince Andrew?

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

25 A. Again, I'm not talking about what

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2 she says as regards to other people. I can
3 talk to things as regards to me.

4 Q. I'm asking if Jeffrey ever said
5 that to you?

6 A. I don't recollect specific
7 conversations along those things.

8 Q. You don't recollect him saying that
9 to you?

10 A. I don't recollect him saying to me
11 that Virginia didn't meet Prince Andrew. I'm
12 sure that wouldn't be a conversation that we
13 would have. It doesn't effect me whether --
14 so I'm really only concerned about the lies
15 that were told as regards to me.

16 Q. Can Jeffrey Epstein confirm or deny
17 whether you sent Virginia to give Glenn Dubin
18 a massage?

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

21 A. I can't say what Jeffrey would say,
22 I can tell you I didn't. I can't tell you
23 what anybody else.

24 Q. Have you discussed with him
25 Virginia's allegation that she gave Glenn

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2 Dubin a massage?

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

5 A. I didn't know that she did say
6 that.

7 Q. Do you know whether Jeffrey Epstein
8 has ever sent anybody to Glenn Dubin to
9 perform a massage for him?

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

12 A. I couldn't possibly recollect
13 whether he did anything like that.

14 Q. Did you ever send anybody, not
15 Virginia, anybody else over to Glenn Dubin's
16 home for a massage?

17 A. Not to the best of my knowledge.

18 Q. Do you know one of Alexander
19 Dixon's friend by the name of Anuska
20 DiGeorgio?

21 A. I do recollect a person of that
22 name.

23 Q. How do you know her?

24 A. I don't recollect.

25 Q. Did you meet her through Jeffrey?

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2 A. I don't recollect.

3 Q. Do you recall when you met her?

4 A. I do not recollect.

5 Q. How many times have you seen Anuska
6 DiGeorgio in your life?

7 A. The only reason I remember is
8 because it's an unusual name but I couldn't
9 tell you anything else.

10 Q. You didn't see her on a regular
11 basis, she wasn't one of your friends?

12 A. No.

13 Q. Was Anuska DiGeorgio a masseuse?

14 A. Not to my knowledge.

15 Q. Do you have knowledge of whether
16 she had a sexual relationship with Jeffrey
17 Epstein?

18 A. I have no knowledge of that.

19 Q. When was the last time you spoke
20 with her?

21 A. A very long -- I have no idea.

22 Q. Would it be years?

23 A. Yes.

24 Q. What do you remember about Anuska
25 DiGeorgio?

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2 A. Nothing really.

3 Q. Do you remember what she looks
4 like?

5 A. I would just be speculating on how
6 I remember. I couldn't describe her.

7 Q. Do you recall traveling with her?

8 A. I don't.

9 Q. Did you ever go to her home?

10 A. I don't believe I did.

11 Q. Do you know where she lives?

12 A. I don't.

13 Q. Would you have met her through
14 Jeffrey Epstein?

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

17 A. I already testified I don't
18 recollect how I met her and I remember her
19 because her name is very unusual.

20 Q. So what's your -- what recollection
21 do you have of her, do you have a specific
22 recollection of meeting her somewhere, you
23 just don't know when that was or how do you
24 know that name Anuska DiGeorgio?

25 MR. PAGLIUCA: Objection to the

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2 form and foundation.

3 A. I don't know why the name is -- I'm
4 sorry -- I can't -- I have no idea. I
5 recognize the name but that's it.

6 Q. Was Johanna Sjoberg a masseuse?

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

9 A. What are you asking me, I'm sorry?

10 Q. When Johanna Sjoberg worked for
11 Jeffrey Epstein, did she perform massages?

12 A. I've testified that when Johanna
13 came originally, she came to answer
14 telephones. I believe at some point she
15 became a masseuse. I don't recollect when
16 and I personally had massages from Johanna.

17 Q. What did Johanna do for Jeffrey
18 Epstein, did she perform massages, anything
19 else?

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

22 A. When she came she answered phones
23 and at some point, I believe, I don't have
24 any firm recollection, but I believe she went
25 to school and became a masseuse and I had

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2 messages from her.

3 Q. Did you ever have any sexual
4 interaction with her?

5 MR. PAGLIUCA: Object to the form
6 and foundation and I'm going to instruct
7 you if we're talking about any
8 consensual adult contact, you are not
9 allowed to answer the question.

10 Q. Did you have any sexual contact
11 with her in the presence of Jeffrey Epstein?

12 MR. PAGLIUCA: Same instruction.

13 Q. Did you have any sexual contact
14 with her in the presence of anybody other
15 than Jeffrey Epstein?

16 MR. PAGLIUCA: Same instruction.

17 Q. How many messages did you receive
18 from Johanna?

19 A. I really don't recall but a fair
20 amount.

21 Q. Did the messages involve sex?

22 MR. PAGLIUCA: I'm going to
23 instruct you not to answer.

24 Q. Have you ever engaged in sex with
25 any female?

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2 MR. PAGLIUCA: I'm going to
3 instruct you not to answer.

4 MS. McCAWLEY: I want the record to
5 reflect that Ms. Maxwell's attorney is
6 directing her not to answer this series
7 of questions.

8 MR. PAGLIUCA: It definitely does.

9 Q. Were you responsible for
10 introducing Anuska to Jeffrey Epstein?

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

13 A. I already testified that I don't
14 really recall Anuska.

15 Q. Were you responsible for
16 introducing Johanna to Jeffrey Epstein?

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

19 A. Again, I don't like the
20 characterization of introduction. Johanna
21 came to answer telephones.

22 Q. When did you -- were you the person
23 who brought or introduced or met Johanna for
24 purposes of bringing her to Jeffrey Epstein's
25 home?

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

4 A. That's not how I would characterize
5 that.

6 Q. How would you characterize it?

7 A. I have testified that I'm
8 responsible for finding professional people
9 to work in the homes, age appropriate adult
10 people, so from pool attendants, to
11 gardeners, to chefs, to housekeepers, to
12 butlers, to chauffeurs and one of the
13 functions was to be able to answer the
14 telephones and in the context of finding
15 someone to answer the telephones, I did look
16 to try to find appropriate people to answer
17 the phones.

18 Q. So did you find Johanna for
19 purposes of that role?

20 A. So in the course of looking for
21 somebody to answer phones at the house,
22 Johanna was one of the people who said that
23 she was willing to answer phones.

24 Q. Did you approach her at her school
25 campus?

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2 MR. PAGLIUCA: Objection to form
3 and foundation.

4 A. I honestly don't recall how, in
5 that moment, how I met Johanna and how she
6 came to get the job but...

7 Q. Did you typically, in your work for
8 Jeffrey Epstein, would you typically go to
9 school campuses to try to find individuals to
10 work for Jeffrey Epstein?

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

13 A. I never -- what do you mean by
14 school? Let's characterize school.

15 Q. Any kind of school.

16 A. Obviously not. I never went to any
17 school with young people. Johanna, I believe
18 came from an adult university, as I would
19 know in England, so university, I went there
20 but I never went, as I best recollect,
21 anywhere else.

22 Q. Did you -- what university was it
23 that you went to?

24 A. I don't recall the university that
25 she went to right now.

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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 Johanna?

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 Les Wexner, 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

1 G Maxwell - Confidential

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 Alfredo

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2 Rodriguez 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 Johanna's 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 Johanna's 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 Johanna, 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 Johanna's 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 Gwendolyn Beck,
7 do you know Gwendolyn Beck?

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 Gwendolyn Beck?

25 MR. PAGLIUCA: Object to the form

1 G Maxwell - Confidential

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

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2 around. I can't testify to that.

3 Q. Were you around in 2004, 2005?

4 A. I already testified that I was
5 there when Jeffrey's mother passed away and
6 so you know, I did visit for her passing and
7 I believe I was there for a couple of days in
8 2005.

9 Q. So if an employee of Mr. Epstein in
10 2004 said that you were the employee's direct
11 supervisor, would that be incorrect?

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

14 A. What employee, what's the
15 circumstances and what is the story, I don't
16 know what you are asking me.

17 Q. If Alfredo Rodriguez said in 2004
18 when he was hired, you were his direct
19 supervisor, would that be true?

20 A. No.

21 Q. Were you in 2004 supervising Sarah
22 Kellen?

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

25 A. I never supervised Sarah Kellen.

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2 Q. Did Sarah Kellen take orders from
3 you?

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

6 A. She worked for Jeffrey.

7 Q. If Alfredo Rodriguez said you had
8 knowledge of underage girls coming to
9 Jeffrey's home for the purpose of sex, would
10 you contend that that is truthful?

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

13 A. I have no idea what you are talking
14 about, I'm sorry.

15 Q. If Alfredo Rodriguez said that you
16 have knowledge of underage girls coming to
17 Jeffrey's home for the purpose of having
18 massages involving sex, would you say that
19 that statement is truthful?

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

22 A. I can't testify to what Alfredo
23 said or didn't say.

24 Q. I'm saying if Alfredo said that you
25 had knowledge that there were girls coming

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2 over to the house that were underage for the
3 purposes of sex, would that statement be
4 true?

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

7 A. I can't testify to what Alfredo
8 said or didn't say or what he thought.

9 Q. Did you have knowledge of underage
10 girls coming to Jeffrey Epstein's house for
11 the purpose of sex?

12 A. No.

13 Q. Earlier I believe you testified,
14 correct me if I'm wrong, that the document
15 that is in front of you, the thicker document
16 was a stolen document.

17 Do you know who stole that
18 document?

19 A. I have read that Alfredo stole the
20 document.

21 Q. And where have you read that?

22 A. I believe it was reported in the
23 press.

24 Q. Earlier we were talking about the
25 computers at Jeffrey Epstein's home. Did you

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2 have a computer that was your computer
3 located in Jeffrey Epstein's home?

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

6 A. I've testified to the computer
7 already. Even when I was around, there was a
8 computer that people had access to.

9 Q. So is Alfredo Rodriguez telling the
10 truth when he says that he downloaded that
11 book from your computer?

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

14 A. I couldn't possibly tell you what
15 Alfredo did or didn't do or said or didn't
16 say.

17 Q. Was it on your computer?

18 A. I already testified I have no idea
19 where this document came from.

20 Q. Did you have a list of names of
21 individuals with contact information for
22 Jeffrey Epstein on your personal computer?

23 A. Again, that wasn't my computer. I
24 already said that was a computer that lots of
25 people would have, so I have no recollection

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2 of this document being on it, so I don't know
3 where this came from.

4 Q. I understand the computer at the
5 house that you're referencing. On a personal
6 computer of yours, did you have that
7 document?

8 A. I don't know where this document
9 came from, so I can't possibly say this
10 document was on any computer that I may have
11 had access to.

12 Q. On a personal computer of your own,
13 did you have lists of the phone numbers and
14 contact information relating to Jeffrey
15 Epstein?

16 A. Like everybody, I have an address
17 book but I can't possibly testify to where
18 this thing came from.

19 Q. Was it your address book or was it
20 addresses that related to Jeffrey Epstein?

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

23 A. I don't know what you're asking me.

24 Q. On your personal computer, the
25 address book you are referencing, was it your

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2 address book with individuals you knew or was
3 it an address book for your employer, Jeffrey
4 Epstein?

5 A. Jeffrey has his situation and I
6 have no -- this is Jeffrey's, it came from
7 his home, so I can't testify to anything
8 about this in that period of time.

9 Q. So you didn't have on your computer
10 a list of contact information for individuals
11 that was related to Jeffrey Epstein?

12 A. I don't recall exactly what I had
13 back in 2004 and 2005, so I can't say what I
14 had back then that relates to his addresses,
15 I can't recall.

16 Q. So is it possible that someone
17 could have downloaded from your personal
18 computer a list of names and address that
19 were affiliated with Jeffrey Epstein?

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

22 A. This didn't come from any computer
23 of mine.

24 Q. But is it possible that someone
25 could have downloaded a list of names and

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2 addresses affiliated with Jeffrey Epstein
3 from your computer?

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

6 A. I already said, I didn't have a
7 computer there, so I don't know where this
8 came from, I have no idea.

9 Q. I'm going to read to you some
10 testimony from Alfredo Rodriguez's deposition
11 and it's on page 370 and I want to ask you a
12 question about it, if it's true or false?

13 MR. PAGLIUCA: I'm going to object
14 unless you show the witness the
15 document.

16 MS. McCAWLEY: I will pass it. We
17 are not going to mark it. We will skip
18 it.

19 Q. Did you ever tell Alfredo Rodriguez
20 that he better watch out and better keep his
21 mouth shut with respect to what occurred at
22 Mr. Epstein's home?

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

25 A. It doesn't sound like anything I

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2 would say.

3 Q. Did you ever threaten Alfredo
4 Rodriguez in any way if he were to disclose
5 information he learned from his employment
6 with Jeffrey Epstein?

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

9 A. I'm happy to answer. No, I never
10 threatened him in any way.

11 Q. Were you concerned that he was
12 going to disclose that Jeffrey Epstein was
13 trafficking underage girls?

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

16 A. First of all, there are so many
17 things wrong with that question, but I have
18 no knowledge of what you are talking about.

19 Q. Have you ever contacted or
20 instructed anyone to contact any witness in
21 this case for the purposes of threatening
22 them not to testify in this case?

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

25 A. I have never called anybody with

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2 reference to this case with any, anything you
3 just mentioned, I never threatened anyone.

4 Q. Have you ever directed anyone to
5 call any witnesses relevant to this case and
6 threaten them not to testify?

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

9 A. I never done such a thing.

10 Q. Did Jeffrey Epstein or you ever ask
11 any female, regardless of age, to carry
12 Jeffrey's baby for him?

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

15 Q. Or anything along those lines?

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

18 A. Can you repeat the question,
19 please?

20 Q. Did you or Jeffrey Epstein ever ask
21 any female, regardless of age, to carry
22 Jeffrey Epstein's baby for him?

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

25 A. Are you asking --

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2 Q. To become pregnant, did you or
3 Jeffrey Epstein ever ask any female to become
4 pregnant and carry Jeffrey Epstein's baby for
5 you or for Jeffrey?

6 MR. PAGLIUCA: Objection to form
7 and foundation.

8 A. You need to be very specific. I
9 have no idea what you are talking about.
10 That's completely rubbish.

11 Q. Did you or Jeffrey Epstein ask any
12 female to become pregnant and carry his baby
13 for either him or you?

14 MR. PAGLIUCA: Objection to the
15 form and foundation. Go ahead.

16 A. I can't testify to anything Jeffrey
17 did or didn't do when I am not present, but I
18 have never asked anybody to carry a baby for
19 me.

20 Q. Or anything along those lines?

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

23 Q. I want to make sure we are talking
24 about the same thing, not physically carry a
25 baby, I mean become pregnant with a baby?

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

4 Q. I want to make sure we are clear.

5 A. I don't know what you are asking.

6 Q. That's why I want to make sure we
7 are clear.

8 A. We are clear. I never asked
9 anybody to carry a baby for me.

10 Q. Do you know if Jeffrey ever asked
11 anybody to carry a baby for him?

12 A. I'm not going to characterize any
13 conversation Jeffrey had with somebody else.

14 Q. You are not aware of that, is that
15 your testimony?

16 A. I am testifying I never have and I
17 will not testify for anything for Jeffrey.

18 Q. Did you ever hear Jeffrey ask
19 anybody to carry a baby for him?

20 A. I don't recollect conversation
21 about Jeffrey and babies in any form.

22 Q. Did Jeffrey ever tell he wanted to
23 have a baby?

24 A. I don't recollect baby
25 conversations with Jeffrey.

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2 Q. So he never told you he wanted to
3 have a baby?

4 A. I don't recollect any baby
5 conversations with him saying he wanted to
6 have a baby.

7 Q. Did you ever bring any females to
8 the Dubin's house that were not your friends'
9 children that were under the age of 18?

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

12 A. I have never, to my knowledge,
13 brought anybody under the age of 18 that's
14 not a friend of my family or my nieces or
15 nephews to the Dubin household.

16 Q. Earlier today you testified, I
17 believe, that with respect to your town home
18 Jeffrey paid for some of that and then gave
19 you a loan, is that correct?

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

22 A. I said, actually I think it was a
23 loan, I believe it was a loan.

24 Q. The whole thing?

25 A. As best as I can recollect.

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2 Q. Did you pay that loan back?

3 A. I don't have any outstanding loans
4 with him.

5 Q. So you paid it back?

6 A. I don't have any outstanding loans
7 with him.

8 Q. That's not an answer to my
9 question.

10 Did you pay back Jeffrey for the
11 loans?

12 A. I have paid back any loans I had
13 with him.

14 Q. You have or haven't?

15 A. Have.

16 Q. Were there any other gifts that
17 Jeffrey gave you during the time period of
18 say 1999 to the present that were in excess
19 of \$50,000?

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

22 A. What's the question again?

23 Q. Did Jeffrey give you any gifts in
24 excess of amounts of \$50,000, I'm not talking
25 about a scarf here or something

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2 insignificant, from 1999 to the present?

3 A. I can't recollect any gifts.

4 Q. Did he ever buy you a car?

5 A. I really don't recall, I can't
6 recall, it's a long time ago.

7 Q. You can't recall if Jeffrey Epstein
8 ever bought you a car?

9 A. I believe he did buy me a car, I
10 don't recall how much it cost. I don't
11 recall any of the financial details of that.

12 Q. Do you still have that car?

13 A. I don't.

14 Q. How long ago did you get rid of
15 that car?

16 A. I don't recall all the cars. There
17 was a car back -- there was -- I don't
18 recall, I'm sorry.

19 Q. He supplied you with several cars?

20 MR. PAGLIUCA: Object to the form
21 and the mischaracterization of the
22 testimony.

23 A. I don't recall details of the cars.

24 Q. Did he supply with you more than
25 one car?

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2 A. Over the course of time, I've
3 driven many cars.

4 Q. That Jeffrey provided to you?

5 A. They were cars that could be driven
6 and I just don't recall them.

7 Q. Were they in your name?

8 A. I don't recall.

9 Q. You don't recall if Jeffrey Epstein
10 ever put a car in your name?

11 A. We are talking a long time ago, I
12 really don't recall.

13 Q. When is the last time you had a car
14 from Jeffrey Epstein that you used?

15 A. 2000, 2001, 2002.

16 Q. Do you recall what kind of a car
17 that was?

18 A. I don't recall, I'm sorry.

19 Q. Did Jeffrey Epstein purchase
20 anything else for you besides the townhouse
21 and cars that would be over the amount of
22 \$50,000?

23 A. I didn't say that he did, I said I
24 had a loan.

25 Q. Besides the loan, I'm sorry, you

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2 are right, you did say you had a loan and you
3 said you paid that back, correct?

4 A. That's my testimony.

5 Q. Anything else in excess of \$50,000
6 that he would have purchased for you?

7 A. We are talking 2002, 2001, I don't
8 recall any gifts really.

9 Q. When is the last time Jeffrey
10 Epstein gave you a gift in excess of \$50,000?

11 MR. PAGLIUCA: Assumes facts not in
12 evidence. Form and foundation.

13 Q. You're saying you don't remember
14 from 2001 and 2002. I'm asking when is the
15 last time you remember Jeffrey Epstein
16 purchasing a gift for you?

17 A. I don't recall gifts in excess of
18 \$50,000, I barely recall gifts, I barely
19 recall a lot of this -- I'm sorry, I don't
20 recall.

21 Q. Is Jeffrey Epstein paying for your
22 legal fees in this case?

23 A. No.

24 Q. Is he paying for anything related
25 to this case?

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2 A. No.

3 Q. Are you aware of any grand theft
4 police report relating to Virginia Roberts?

5 A. I believe I've read a report in the
6 press on that.

7 Q. Did you provide the press with a
8 report on a grand theft by Virginia Roberts?

9 A. I don't know how the press got that
10 story.

11 Q. Do you know if Virginia Roberts
12 committed a grand theft?

13 A. I only know what I read in the
14 press.

15 Q. Did you ever state to the press
16 that Virginia Roberts committed a grand
17 theft?

18 A. I've never had any conversation
19 directly with press.

20 Q. Did any of your representatives
21 ever inform the press that Virginia Roberts
22 committed a grand theft?

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

25 A. I have no way of knowing what my

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2 representatives said to press or didn't.

3 Q. Did they ever discuss with you the
4 fact that they were going to report that
5 Virginia Roberts participated in a grand
6 theft?

7 A. I don't know how, first of all, I
8 don't know how I know that. I believe I read
9 it in a press report so...

10 Q. I'm going to mark this as composite
11 exhibit, Maxwell 14 please?

12 (Maxwell Exhibit 14, email, marked
13 for identification.)

14 Q. I'm going to direct you to page GM
15 00109. At the top of that page you are going
16 to see an email address from Jeffrey Epstein
17 on Sunday June 12, 2011 to [REDACTED]

18 [REDACTED]

19 A. Yes.

20 Q. The re line says, This is the
21 actual version they wanted me to send which I
22 changed but this is back from my U.K.
23 lawyers.

24 Do you see that?

25 A. Yes.

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2 Q. If you go down further, you're
3 going to see halfway through the page, you
4 will see your email address the [REDACTED]
5 and you will see a statement that says, Thank
6 you. I have it now. I'm working on the
7 letter a little. I will send final version
8 tomorrow and whatever is in it will be
9 factually accurate.

10 Beneath that you will see Philip
11 Barden who I believe you identified earlier
12 as one of your attorneys?

13 A. Uh-huh.

14 Q. And you will see a letter, starting
15 the text of a letter starting, I want you to
16 turn to the second page which is GM 00110.
17 About halfway through the page, it says you
18 will also presumably draw attention to the
19 fact that prior to filing her suit against
20 Mr. Epstein, Ms. Roberts fled the U.S. to
21 avoid being arrested for grand theft. Police
22 report available.

23 What grand theft were you referring
24 to there that Virginia Roberts committed?

25 MR. PAGLIUCA: Objection to the

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2 form and foundation.

3 A. I don't know. However, I believe
4 she stole money from somewhere where she
5 worked.

6 Q. How do you know that was grand
7 theft?

8 A. I don't know how I know that.

9 Q. So you authorized a statement that
10 characterized that as grand theft without
11 knowing whether it was grand theft?

12 A. What month, what is the date of
13 this?

14 Q. The date of this is June 12, 2011?

15 A. So I'm afraid such a long time ago,
16 I'm not sure how, I really couldn't testify
17 as to how that language ended up in here.

18 Q. Do you have the police report? It
19 says police report available. Do you have
20 that document?

21 A. I don't have that document.

22 Q. Who does?

23 A. I have no idea.

24 Q. Would your lawyer Philip Barden
25 have that document?

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2 A. I don't know who has this document.

3 Q. What's your basis in that statement
4 for saying Ms. Roberts fled the U.S.?

5 A. Again, you are asking me for a
6 statement that I made in 2011 and I can't say
7 what in 2011 exactly the basis of that
8 statement was.

9 Q. So you don't know whether or not
10 that statement is true?

11 A. This is in 2011 and it never went
12 out, so I'm not sure exactly.

13 Q. But you said in your email that you
14 were working to make it factually accurate,
15 is that correct?

16 A. That's what it says.

17 Q. I'm going to mark as Maxwell 15 a
18 document dated February 24, 2015?

19 (Maxwell Exhibit 15, email, marked
20 for identification.)

21 Q. This is an email from Ross Gow who
22 you've identified as your press agent on
23 February 24, 2015 to [REDACTED] which I understand
24 to be your email address and Philip Barden.
25 The subject line says, VR cried rape. Prior

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2 case dismissed as prosecutors found her not
3 credible. The message says, Ghislaine, some
4 helpful leakage, dot dot dot. What is it you
5 were leaking to the press?

6 MR. PAGLIUCA: Objection, there is
7 no foundation that she leaked anything
8 and you know that.

9 Q. What was it that you were leaking
10 to the press in that statement?

11 A. Again, I don't think that's
12 referring to that, that's just referring to
13 the press getting hold of whatever story it
14 is.

15 Q. What was Ross Gow leaking to the
16 press?

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

19 A. It doesn't say Ross was leaking
20 anything. It doesn't say that.

21 Q. The statement says, helpful
22 leakage, is that correct?

23 A. It says helpful leakage. That
24 doesn't mean he leaked anything.

25 Q. Did you leak to the press

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2 information to the press information about
3 the subject line, VR cried rape, prior case
4 dismissed as prosecutors found her not
5 credible?

6 A. I don't no idea what Ross is
7 referring to. I think he is referring to the
8 press held the story. I couldn't testify to
9 that.

10 Q. Did you leak to the press
11 information regarding the statement, VR cried
12 rape prior case dismissed as prosecutors
13 found her not credible, either through you or
14 through your press agents?

15 A. I think this is coming from the
16 daily mail.

17 Q. That is not my question, I'm asking
18 whether you or your press agent leaked that?

19 A. I have no knowledge, I have no
20 idea, I'm sorry. I can't -- I have no
21 recollection. I have no idea what she is
22 talking about.

23 Q. I'm going to mark this as 16?

24 (Maxwell Exhibit 16 email marked
25 for identification.)

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2 Q. This is an email addressed at the
3 top from Jeffrey Epstein on Monday, January
4 12, 2015 to [REDACTED] which I understand to be
5 your email address. The email reads, You can
6 issue a reward to any of Virginia's friends,
7 acquaints, family, that come forward to help
8 prove her allegations are false. The
9 strongest is the Clinton dinner and the new
10 version of the Virgin Islands that Stven
11 Hawking practiced in an underage orgy.

12 Did you offer any rewards to
13 Virginia's family or friends to contradict
14 Virginia's story?

15 A. Absolutely not.

16 Q. Did Jeffrey Epstein offer any
17 rewards to any of Virginia's, as he suggests
18 here, friends, family or acquaintances to
19 contradict Virginia's story?

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

22 A. I have no idea what he did.

23 Q. Did he tell he was going to offer
24 rewards to Virginia's acquaintances, friends
25 and family to prove her allegations were

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2 false?

3 A. He did not.

4 Q. Do you know whether Jeffrey Epstein
5 paid Rebecca Boylen to give testimony about
6 Virginia Roberts?

7 A. I don't know who Rebecca Boylen is.

8 Q. So you don't know whether Jeffrey
9 Epstein paid her?

10 A. I don't know who Rebecca Boylen is.

11 Q. Have you ever contacted any of
12 Virginia's friends, acquaintances or family
13 regarding this case?

14 A. I don't know who Virginia's friends
15 or family are and I have not contacted
16 anybody related to her in any way, shape or
17 form.

18 Q. I will turn you, I believe it's the
19 thicker document which is Maxwell, I believe
20 it was 14, right there, the compilation
21 document to GM, at the bottom, GM 00071. You
22 actually may want to turn to the prior page
23 70 so you can see the email chain. At the
24 top of the page --

25 MR. PAGLIUCA: I don't have a 00071

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2 on mine.

3 MS. McCAWLEY: It's the second page
4 in that document.

5 MR. PAGLIUCA: Okay.

6 Q. It's dated Friday March 11, 2011
7 from Maxwell to Jeffrey with the title, Daily
8 Mail and there is a forward from Ross Gow to
9 you and a number of other individuals, that's
10 on the cover page and as you scroll to the
11 second page, you are going to see that part
12 of the chain that I'm asking about and that
13 is the chain at the bottom which is dated
14 3/10/2011 from Brian Basham and it says we
15 think -- we should think about the letter to
16 the editor. School can be university. Age
17 of consent in Florida is complex. See below,
18 if you are 16 years old, a sexual
19 relationship with someone between 18 and 24
20 is legal in Florida. Two persons between 16
21 and 24, Florida statute 794.05. A person 24
22 years or of age or older who engages in
23 sexual activity with a person 16 or 17 years
24 of age commits a felony in the second degree.
25 So as soon as you turn 16 you are able to

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2 have sexual relations and you can have sexual
3 relations with a minor under the age of 18
4 until your 24th birthday.

5 Why were you concerned with the age
6 of consent in Florida?

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

9 A. I wasn't concerned. I think this
10 was somebody sending me the statute for
11 informational purposes.

12 Q. Who is Brian Basham?

13 A. He is the person who, Ross Gow's
14 boss I believe, I don't know what the
15 relationship is.

16 Q. I didn't hear you?

17 A. I think he owns the agency, I'm not
18 sure exactly.

19 Q. Why would he be sending you
20 information addressing concerns about the age
21 of consent in Florida?

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

24 A. I think he was just trying to be --
25 telling me details that would happen,

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2 Virginia in '11 was claiming she was 15 and
3 we thought she was 17. I didn't know what
4 the statutes were in Florida and I think he
5 was just trying to be helpful so I would
6 know.

7 Q. Did you have a concern that you had
8 violated this statute in Florida?

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

11 A. No.

12 Q. Did you have a concern that Jeffrey
13 Epstein had violated this statute in Florida?

14 A. I'm not concerned what happened
15 with Jeffrey. I'm only concerned what
16 happens with me.

17 Q. Why did you communicate with your
18 press agent about the sexual consent age in
19 Florida?

20 MR. PAGLIUCA: Objection to the
21 form and foundation. It misstates her
22 testimony.

23 A. I wasn't concerned. I think he was
24 being helpful and stating what the statute
25 was.

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2 Q. I'm going to turn you now in that
3 same stack the Bates number GM 00088. At the
4 top of the email you are going to see Jeffrey
5 Epstein, dated June 8, 2011, to you and it's
6 got a re line, Vanity Fair. If you go down
7 the chain you will see where it says under
8 your email, Do you have a problem with
9 anything I said.

10 Were you communicating with Jeffrey
11 to confirm what statements you could put in
12 any press releases you were given?

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

15 A. Any interest I have is in accuracy.

16 Q. Were you confirming with Jeffrey
17 Epstein what information you could put in
18 press releases?

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

21 A. Again, I'm only looking for
22 accuracy.

23 Q. Why would you ask him if he had a
24 problem with anything you were saying?

25 A. If there is anything I

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2 characterized that was not correct.

3 Q. That's not what you said. You
4 said, do you have a problem with anything I
5 said.

6 MR. PAGLIUCA: Objection to the
7 form and foundation. There is no
8 question pending.

9 MS. McCAWLEY: There is.

10 MR. PAGLIUCA: That's not a
11 question, it's a statement.

12 MS. McCAWLEY: Don't interrupt me.

13 Q. Di you say, do you have a problem
14 with anything I said?

15 A. That was asking in my parlance that
16 I wanted him to check it for accuracy.

17 Q. Did he tell you there was anything
18 inaccurate about the statement?

19 A. Again, I have to read the whole
20 thing to figure that out.

21 Q. Were you coordinating with Jeffrey
22 Epstein during this time period in 2011
23 regarding statements that you were issuing to
24 the press?

25 MR. PAGLIUCA: Did you withdraw the

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2 last question.

3 MS. McCAWLEY: I'm not withdrawing
4 anything. I'm asking a question.

5 MR. PAGLIUCA: There was a question
6 pending. You didn't let the witness
7 answer the question, then you moved on
8 to another question so I'm asking for
9 clarification for the record now which
10 question are we answering.

11 MS. McCAWLEY: There is an answer.
12 The question was did he tell you
13 anything, there was anything in the
14 statement inaccurate about the statement
15 and she said again, I read the whole
16 thing --

17 THE WITNESS: I would have to.

18 MS. McCAWLEY: -- I would have to
19 read the whole thing to figure that out.

20 MR. PAGLIUCA: Then she started
21 reading it and you asked another
22 question.

23 MS. McCAWLEY: That's the question.

24 MR. PAGLIUCA: I'm wondering if its
25 still pending.

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2 MS. McCAWLEY: It was answered.

3 Q. Were you coordinating with Jeffrey
4 Epstein during the time period in 2011
5 regarding the statements you were issuing to
6 the press?

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

9 A. I only wanted to be accurate in any
10 factual statements that I made.

11 Q. You knew at that time that Jeffrey
12 Epstein had been convicted for sexual abuse
13 of a minor, is that correct?

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

16 A. He was sentenced I believe for
17 underage -- soliciting an underaged
18 prostitute.

19 Q. You knew that he was a registered
20 sex offender?

21 A. Yes.

22 Q. You were coordinating with him the
23 statement that you were going to be making to
24 the press to confirm whether they were
25 accurate in your words?

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

4 A. I was not coordinating with
5 Jeffrey. He had details that I did not have.
6 I was not party to his case. I needed to
7 have information in order to be able to
8 respond so I was not coordinating with him.
9 I was merely asking for details that I could
10 have.

11 Q. Did Jeffrey write any of your press
12 statements for you?

13 A. No.

14 Q. He didn't draft any of them?

15 A. I have a lawyer who was working on
16 this and that was -- I asked, I believe as I
17 recollect asked him for information to make
18 sure I was being accurate in the
19 representations for whatever I was
20 discussing.

21 Q. Did Jeffrey provide you with any
22 drafts of statements to provide to the press?

23 A. I only recall drafts from my
24 lawyer.

25 Q. I will mark this as Maxwell 17.

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2 (Maxwell Exhibit 17, email, marked
3 for identification.)

4 Q. This is an email from you on
5 January 10, 2015 to Philip Barden and Ross
6 Gow. The statement you had before you
7 earlier, that, if you can pull that in front
8 of you, the one page press release that you
9 gave. You might know from memory.

10 Was the press release that you
11 issued with the statement about Virginia
12 issued in or around January 2, 2015?

13 A. As best as I can recollect.

14 Q. I want to turn your attention to
15 the document I just handed you which is Bates
16 No. 001044, from you to Philip Barden and
17 Ross Gow. It says in the first sentence, I'm
18 out of my depth to understand defamation,
19 other legal hazards and I don't want to end
20 up in a lawsuit aimed at me from anyone, if I
21 can help it. Apparently, even saying
22 Virginia is a liar has hazards.

23 You knew at the time you called
24 Virginia a liar in early January of 2015 that
25 that was something that would result in a

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2 lawsuit, is that correct?

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

5 A. I have legal advice that I took.

6 Q. But you knew in early January by
7 making a statement calling Virginia a liar
8 that you were subjecting yourself to a legal
9 dispute with her?

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

12 A. I took legal advice as to what
13 should be said and not be said and the legal
14 advice that came from the United Kingdom
15 was --

16 MR. PAGLIUCA: You are not allowed
17 to talk about any legal advice that you
18 got from anybody that's a lawyer.

19 A. Sorry.

20 Q. So is it correct without telling me
21 what you talked to your lawyers about that
22 you knew because this is dated January 10
23 that when you made this statement in early
24 January, January 2 of 2015 you knew that
25 calling Virginia a liar would subject you to

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2 a legal action, isn't that correct?

3 MR. PAGLIUCA: Objection to the
4 form and foundation. As to what you
5 knew -- whatever she knows would be
6 privileged.

7 MS. McCAWLEY: I'm asking if she
8 knows. I'm not asking her to tell me
9 about her privileged communications.

10 A. All I can say is I asked a question
11 and received legal advice.

12 (Maxwell Exhibit 18, email, marked
13 for identification.)

14 Q. This is an email dated January 15,
15 2015 from Jeffrey Epstein to you?

16 A. Uh-huh.

17 Q. It states in the first line, do you
18 want [REDACTED] to come out and say she was the
19 girlfriend during the time?

20 MR. PAGLIUCA: Objection to the
21 form and foundation of the question and
22 actually the word is [REDACTED], there
23 is no vowel in there.

24 MS. McCAWLEY: I was just trying to
25 pronounce it.

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2 Q. This email reads do you want
3 [REDACTED] without a vowel, to come out and say
4 she was the girlfriend during the time.

5 Who was Jeffrey Epstein referring
6 to?

7 A. I believe he was referring to
8 [REDACTED].

9 Q. Why was he asking you if you wanted
10 [REDACTED] to come out and say she was the
11 girlfriend?

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

14 A. The way the press and you were
15 characterizing me is I was with Jeffrey
16 throughout this entire period of time and I
17 was not.

18 Q. Was [REDACTED] with Jeffrey during this
19 period of time?

20 A. I believe she was.

21 Q. Did Jeffrey come out and tell the
22 press it was [REDACTED] and not you that was with
23 him as he is proposing here?

24 A. I don't believe he did.

25 Q. Did you want him to do that?

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2 A. No, I didn't ask him to do
3 anything. No.

4 Q. So do you know in January of 2015,
5 was [REDACTED] his girlfriend?

6 A. 2015, I have no idea who was his
7 girlfriend in 2015.

8 Q. I'm sorry, you are correct.

9 In the period of 1999 to 2002, was
10 [REDACTED] his girlfriend?

11 A. They spent a lot of time together.

12 Q. Did you talk to [REDACTED] about going
13 to the press and saying that she was the
14 girlfriend and not you?

15 A. I have never spoken to [REDACTED]

16 Q. Was [REDACTED] offered any money to
17 make a statement that she was the girlfriend?

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

20 A. I have no idea. I have never
21 spoken to [REDACTED] and I don't know anything --
22 I have no idea.

23 (Maxwell Exhibit 19, email, marked
24 for identification.)

25 Q. That's an email from Jeffrey to

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2 Maxwell dated January 25, 2015.

3 A. Uh-huh.

4 Q. I will direct your attention to the
5 bottom email which is from you on Saturday
6 January 24, 2015. It says, I would
7 appreciate it if [REDACTED] would come out and
8 say she was your girlfriend. I think she was
9 from the end of '99 to 2002.

10 Does that refresh your recollection
11 that you asked Jeffrey to have [REDACTED] come
12 out and say she was his girlfriend?

13 A. I'm sure I would loved anybody to
14 come out and say they were with Jeffrey
15 rather than me.

16 Q. Was that an accurate statement you
17 were asking to be made to the press?

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

20 A. When is this?

21 Q. 2015. The statement is whether she
22 was the girlfriend from '99 to 2002. As the
23 email reads.

24 A. What is your question?

25 Q. My question is, was that an

1 G Maxwell - Confidential

2 accurate statement you were going to be
3 giving to the press?

4 A. I didn't make the statement and
5 [REDACTED] never came out, so it's completely
6 moot.

7 Q. My question is, was it an accurate
8 statement that [REDACTED] was the girlfriend from
9 '99 to 2002 or were you just making that up
10 for purposes of deflecting press from you?

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

13 A. As I said they spent a lot of time
14 together and...

15 Q. Were you also his girlfriend from
16 '99 to 2002?

17 A. I don't if I would have ever
18 characterized myself as his girlfriend, but
19 [REDACTED] at that time, was with him as much if
20 not more than I was.

21 Q. I will mark this as Maxwell 20?
22 (Maxwell Exhibit 20, email, marked
23 for identification.)

24 Q. This is an email at the top, it's
25 Bates labeled 001060. At the top is a chain

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2 from Jeffrey to you on January 11, 2015 and
3 if you look below, I'm going to start at the
4 bottom of that chain which is January 11 at
5 9:15 from Jeffrey and he wrote, Alan, do you
6 have an article coming out in Monday's paper.
7 If so, could you please forward us a copy.

8 Do you know what Alan Jeffrey was
9 referring to there?

10 A. I don't know.

11 Q. If you look up in the email chain
12 do you see an email address from Alan
13 Dershowitz responding to that letter?

14 A. I do.

15 Q. So that would be Alan Dershowitz
16 that Jeffrey was emailing at that time
17 according to this chain, correct?

18 A. It certainly looks like it.

19 Q. The email from Alan to Jeffrey is,
20 Nothing on Monday. I'm working on several
21 possible articles about unfairness in the
22 legal process that allows false charges to be
23 inserted into legal documents with no
24 opportunity to respond.

25 And do you see above that Jeffrey's

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2 email to you says, quote, Careful.

3 A. Is that to me or to Alan?

4 Q. Jeffrey to [REDACTED] at the top. Why
5 was Jeffrey telling you to be careful?

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

8 A. I have no idea.

9 Q. What was he concerned about with
10 Alan Dershowitz's suggestion in the email
11 below?

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

14 A. I can't possibly know.

15 Q. Did you discuss with him why he
16 told you to be careful?

17 A. I had limited contact with him. I
18 don't recall where this goes in the chain,
19 why he was telling me to be careful, I have
20 no idea.

21 Q. Did you respond to this email?

22 A. If you don't have it, I didn't
23 respond.

24 Q. Did you ever delete emails during
25 the period of January of 2015?

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2 A. I have every email that you asked
3 for in discovery, that I have I gave you.

4 Q. That's not my question.

5 Did you ever delete emails in
6 January of 2015?

7 A. I have not deleted anything that
8 you have asked me for in discovery. I have
9 given you everything that I have.

10 Q. That is not my question, my
11 question is, did you ever delete emails in
12 January of 2015?

13 A. In the normal course of my work,
14 there are emails from spam that I delete.
15 That is the type of email I've deleted.
16 Anything that is material to what you want, I
17 have not deleted.

18 Q. How do you know that?

19 A. Well, anybody that's to do with
20 Jeffrey or Alan or women or anything of which
21 I know you were interested in, of which I
22 have anything I would not have done because I
23 don't want to subject myself to...

24 Q. Have you had your computer
25 forensically copied for purposes of this

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2 litigation?

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

5 A. Has someone made a copy of your
6 computer for purposes of this litigation.

7 A. No.

8 Q. Are you a citizen of the United
9 States?

10 A. I am.

11 Q. Are you also a citizen of England?

12 A. I am.

13 Q. Are you a citizen of any other
14 land?

15 A. TerraMar.

16 Q. That's the name of your charity
17 project that deals with oceans, is that
18 correct?

19 A. Yeah. I'm French as well.

20 Q. Has Jeffrey Epstein funded TerraMar
21 for you?

22 A. He did give some money to TerraMar,
23 yes.

24 Q. How much?

25 A. I believe it was \$50,000.

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2 Q. Earlier today, you said you were in
3 the process of resolving the sale of your
4 town home. Where do you intend to live once
5 your town home is sold?

6 A. That's a good question. I don't
7 have an answer for you yet.

8 Q. You don't have a present plan. Do
9 you intend to live in the United States?

10 A. I don't have a present plan.

11 Q. Are you living outside of your town
12 home right now or are you still there?

13 A. I'm just couch surfing.

14 Q. Has Jeffrey Epstein ever purchased
15 a company for you or put a company in your
16 name?

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

19 A. I have no recollection.

20 Q. Is there a Ghislaine Maxwell
21 corporation, for example?

22 A. No, not that I am aware of that has
23 anything to do with me. There may be with
24 one that someone else owns or started but not
25 one that is related to me.

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2 MS. McCAWLEY: I'm going to take a
3 short break and make sure to keep it
4 short because I know you wanted to -- I
5 just want to wrap up what we have left.

6 THE VIDEOGRAPHER: It's now 5:49 we
7 are off the record.

8 (Recess.)

9 THE VIDEOGRAPHER: It's now 6:00
10 p.m. and we are back on the record.

11 Q. Ms. Maxwell, do you recall being
12 subpoenaed for a deposition back in 2009?

13 A. I do.

14 Q. Why did you avoid giving your
15 deposition in that case when you were
16 subpoenaed and had the opportunity to tell
17 your side of the story?

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

20 A. That's not what happened.

21 Q. What happened?

22 A. As I best recall, I was subpoenaed
23 and a date was set for the subpoena and
24 everything was set and I believe it was with
25 Brad Edwards, correct me if I'm wrong, and

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2 Brad Edwards failed to show up for the
3 subpoena.

4 Q. So your testimony is Brad Edwards
5 did not show up for the deposition that had
6 been set?

7 A. Correct.

8 Q. Did you give any statement that
9 your mother was ill and, therefore, you
10 couldn't take your deposition and had to
11 leave the country indefinitely?

12 A. That's an entirely separate
13 situation. Brad Edwards was involved in the
14 Rothstein scandal which was a RICO, I
15 believe, you know, is when fake suits were
16 created in Jeffrey's case and Rothstein went
17 to jail for 50 years and Brad Edwards worked
18 for that firm.

19 Q. And Mr. Edwards worked for that
20 firm?

21 A. So when the subpoena came, Brad
22 Edwards was involved with Rothstein in the
23 case so when I was called for subpoena, then
24 and I had a subpoena, date and time set, Brad
25 Edwards went AWAL, meaning he failed to

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2 respond to calls and failed to get in touch
3 with my attorneys, even though a date and
4 time was set for the subpoena and so that's
5 what happened to that subpoena. It just
6 didn't happen.

7 Q. We may be talking about two
8 different cases so I will ask the question
9 again.

10 Was there ever a time where you
11 were subpoenaed to sit for a deposition that
12 you could not make it because you said that
13 your mother was ill?

14 A. So that is the same subpoena that
15 Brad Edwards failed to turn up for and then I
16 think five or six months passed between -- a
17 period of time, I can't characterize it
18 exactly, a period of time passed where then
19 he resurfaced and asked for a new subpoena to
20 be -- a new time to be set and because he had
21 contacted the press and done all sorts of
22 things that you guys are familiar with, I
23 believe, it was my lawyer suggested that I
24 should have some sort of protective order and
25 I believe between the time for when Brad

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2 Edwards resurfaced after the Rothstein story,
3 when the guy went to jail for 50 years for
4 creating fake cases in Jeffrey's and other
5 people's cases, in between the time when
6 there were -- trying to figure out the
7 protective situation for me, my mother was
8 sick, she is 89, she was 89 at that time so I
9 -- they -- we can all -- we all have parents,
10 so anyone, I don't know how old your parents
11 are but any parent or godparent, any
12 individual who is in the late 80s 90s, we can
13 understand has health issues so my mother's
14 health was deteriorating very rapidly at that
15 time and we had issues at home with who she
16 would talk to and how to manage her, her
17 healthcare situation and so I went home.
18 They were still arguing about the protective
19 order --

20 Q. Is it your testimony that there was
21 not a date set for your deposition at the
22 time you left to go see your mother?

23 A. I don't believe so.

24 Q. Are you friends with the Clintons?

25 A. I am.

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2 Q. Did you attend a wedding of Chelsea
3 Clinton a few weeks after the date was set,
4 let's say a few weeks after you left to go
5 see your mother who was ill?

6 A. I don't recall exactly when I left
7 but it was before, a few weeks before -- I
8 don't remember the exact timing of that, so
9 I'm sorry, can you repeat the question?

10 Q. Did you come back to the United
11 States to attend Chelsea Clinton's wedding?

12 A. I attended Chelsea Clinton's
13 wedding but I don't know if I came back
14 specifically for that or not.

15 Q. When we were looking at the flight
16 logs earlier, there was a flight where you
17 ended up in the naval base, I believe it was
18 in China, do you know how you got clearance
19 to land at that naval base?

20 A. I need to have a look at whatever
21 document.

22 Q. It's one of the flight logs, it was
23 on the flight with Clinton when we were
24 talking about you landed at a naval base. I
25 know you are a pilot, do you know what you

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2 had to do to get clearance to land at that
3 naval base.

4 MR. PAGLIUCA: If you need to look
5 at something to answer the question, you
6 can. If you can't answer the question
7 without looking at something just
8 indicate such.

9 A. Regardless, I wouldn't have any
10 knowledge of that.

11 Q. Was Sarah Kellen traveling with you
12 on the flights you were on with Clinton?

13 A. I would have to look at a document.
14 I wouldn't know if she was on all of them or
15 not. I don't know.

16 Q. Do you recall her being on any of
17 them?

18 A. To the best of my recollection, I
19 think she was. I don't recollect exactly
20 what flight she was on or not.

21 Q. Sarah Kellen was one of the
22 co-conspirators, physically, in the
23 nonconstitution agreement, is that correct?

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

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2 A. I have never seen the document but
3 my understanding, I believe, is that she was.

4 Q. Did you ever stay the night ever at
5 Les Wexner's house in Ohio, have you ever
6 stayed the night there?

7 A. In his home in Ohio?

8 Q. Yes.

9 A. I don't believe I did.

10 Q. Are you aware of anybody providing
11 Jeffrey with two 12 year old girls as a
12 birthday present?

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

15 A. No.

16 Q. Are you aware of anybody ever
17 providing Jeffrey with French girls under the
18 age of 18 as a birthday present?

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

21 A. No.

22 Q. Do you know whether Jean Luc Brunel
23 provided girls under the age of 18 to Jeffrey
24 for the purposes of sex?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I am un -- the answer is no, I
4 don't know anything about that.

5 Q. Did you ever witness Jean Luc
6 Brunel bringing girls under the age of 18 to
7 any of Jeffrey residences?

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

10 A. I don't recollect Jean Luc coming
11 to the house with girls, period.

12 Q. Do you, when I say house, I'm
13 including the U.S. Virgin Island home.

14 Do you recollect Jean Luc Brunel
15 bringing foreign girls under the age of 18 to
16 the U.S. Virgin Island house?

17 A. I don't recollect anything like
18 that.

19 Q. Do you know how Jeffrey Epstein
20 made his money?

21 A. No.

22 Q. Was Les Wexner or is Les Wexner one
23 of his clients?

24 A. I have no idea.

25 Q. What do you know about the

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2 relationship between Jeffrey Epstein and Les
3 Wexner?

4 A. Are you talking today?

5 Q. Yes, today.

6 A. I have no idea.

7 Q. Do they have a business
8 relationship?

9 A. I have no idea.

10 Q. Did they have a business
11 relationship during the time that you were
12 working for Jeffrey Epstein?

13 A. I believe in the '90s when I was
14 there they had a business relationship.

15 Q. Did they have any other kind of
16 relationship?

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

19 A. The only relationship I am aware of
20 is the business relationship.

21 Q. Do you know why Les Wexner sold the
22 New York house or gave the New York house to
23 Jeffrey, if you know?

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

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2 A. I know nothing about that
3 transaction.

4 Q. Can you list for me all the girls
5 that you have met and brought to Jeffrey
6 Epstein's house that were under the age of
7 18?

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

10 A. I could only recall my family
11 members that were there and I could not make
12 a list of anyone else because that list -- it
13 never happened that I can think of.

14 Q. I'm talking about the time you were
15 working for Jeffrey Epstein, can you list all
16 girls that you found for Jeffrey Epstein that
17 were under the age of 18 to come work for him
18 in any capacity?

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

21 A. I didn't find the girls.

22 Q. You choose the word.

23 MR. PAGLIUCA: If you have a
24 question ask it, you don't choose the
25 word.

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2 Q. List all of the girls you met and
3 brought to Jeffrey Epstein's home for the
4 purposes of employment that were under the
5 age of 18?

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

8 A. I've already characterized my job
9 was to find people, adults, professional
10 people to do the jobs I listed before; pool
11 person, secretary, house person, chef, pilot,
12 architect.

13 Q. I'm asking about individuals under
14 the age of 18, not adult persons, people
15 under the age of 18.

16 A. I looked for people or tried to
17 find people to fill professional jobs in
18 professional situations.

19 Q. So Virginia Roberts was under the
20 age of 18, correct?

21 A. I think we've established that
22 Virginia was 17.

23 Q. Is she the -- sorry, go ahead.

24 Is she the only individual that you
25 met for purposes of hiring someone for

1 G Maxwell - Confidential

2 Jeffrey that was under the age of 18?

3 MR. PAGLIUCA: Objection to form
4 and foundation. Mischaracterizes her
5 testimony.

6 A. I didn't hire people.

7 Q. I said met.

8 A. I interviewed people for jobs for
9 professional things and I am not aware of
10 anyone aside from now Virginia who clearly
11 was a masseuse aged 17 but that's, at least
12 that's how far we know that I can think of
13 that fulfilled any professional capacity for
14 Jeffrey.

15 Q. List all the people under the age
16 of 18 that you interacted with at any of
17 Jeffrey's properties?

18 A. I'm not aware of anybody that I
19 interacted with, other than obviously
20 Virginia who was 17 at this point?

21 (Maxwell Exhibit 21, email, marked
22 for identification.)

23 Q. I'm showing you what's been marked
24 as Maxwell 21, it's an email dated January
25 21, 2015 from Jeffrey to you. Is that, you

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2 can take a moment to take a look at it, is
3 that a statement that Jeffrey Epstein wrote
4 for you to be issued to the press?

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

7 A. The question was?

8 Q. Is this a statement that Jeffrey
9 Epstein wrote for you to be issued to the
10 press?

11 MR. PAGLIUCA: Same objection.

12 A. Is there any other emails that you
13 have that surround this that would allow me
14 to know what -- does this have a context?

15 Q. These were produced by your counsel
16 so the to extent there are emails that
17 surround this, this is what we were given.

18 A. Okay. I don't know whether he
19 wrote this -- obviously he wrote this and
20 sent this to me. I don't know if this is
21 post a phone call we had, I can't recollect
22 exactly.

23 Q. Do you know if this was issued to
24 the press, this statement?

25 A. The only press statement that was

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2 issued is the one that you have.

3 Q. When the paragraph refers to you
4 being in a very long term committed
5 relationship with another man, who was that
6 other man?

7 MR. PAGLIUCA: You don't have to
8 answer the question.

9 MS. McCAWLEY: I'm asking the
10 identity of a witness in a statement she
11 is giving.

12 MR. PAGLIUCA: She didn't give the
13 statement.

14 MS. McCAWLEY: Jeffrey is writing
15 to her, I'm asking who is he is
16 referencing to a long term relationship.

17 You are going to refuse to let her
18 answer that question.

19 MR. PAGLIUCA: Yes.

20 MS. McCAWLEY: I would like to
21 state for the record he is refusing to
22 allow her to identify a potential
23 witness in this litigation. So we will
24 be back to get the answer to that
25 question.

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2 Q. Do you recall when you were
3 traveling with Virginia Roberts that you
4 would be responsible for holding her
5 passport?

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

8 A. I already testified I don't recall
9 traveling with Virginia.

10 Q. Do you recall whether Jeffrey
11 Epstein when he was traveling with a minor,
12 someone under the age of 18, someone would
13 hold their passport?

14 MR. PAGLIUCA: Object to the form.

15 A. I couldn't testify to what Jeffrey
16 did or didn't do.

17 Q. You never observed him gathering a
18 minor's passport and holding it during one of
19 the trips you were on?

20 A. I don't have a recollection of
21 that.

22 Q. Are you familiar with a company
23 called Hyperion Air Inc.?

24 A. I am.

25 Q. Is that a company you are

1 G Maxwell - Confidential

2 affiliated with?

3 A. No.

4 Q. Is that a company that Jeffrey
5 owns?

6 A. I knew it back in 2001, back when I
7 was working. I have no idea what that is
8 today.

9 Q. What about JEGE, are you familiar
10 with that company, JEGE Inc.?

11 A. I don't recall it.

12 Q. You don't recall?

13 A. It vaguely rings a bell. I don't
14 remember what it relates to.

15 Q. What about J Epstein Virgin Islands
16 Foundation, Inc.

17 Are you familiar with that company?

18 A. No.

19 Q. How did J Epstein & Company, Inc.?

20 A. Again, I don't recall his business
21 names and affiliations.

22 Q. How about NES LLC, are you familiar
23 with that name?

24 A. Again, I think that was one of his
25 businesses, but I don't recall.

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2 Q. Do you know what that business did?

3 A. I don't.

4 Q. How about New York Strategy Group
5 Inc.?

6 A. I don't know.

7 Q. What about Ghislaine Maxwell
8 Company, are you familiar with that company?

9 A. I never heard of that.

10 Q. Is that a company you are on record
11 as being either a board member of or having a
12 position of authority in?

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

15 A. I've never heard of the business.

16 Q. What negative, unflattering,
17 private or potentially embarrassing
18 information does Jeffrey Epstein know about
19 you?

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

22 A. I imagine none.

23 Q. Does he know, does he have any
24 knowledge of any illegal activity that you've
25 conducted?

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

4 A. If you want to ask Jeffrey
5 questions about me, you would have to ask
6 him.

7 Q. Have you ever been involved in any
8 illegal activity in your lifetime?

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

11 A. I can't think of anything I have
12 done that is illegal.

13 Q. Have you ever been arrested?

14 A. I have a DUI in the U.K. a long
15 time ago.

16 Q. Is that the only arrest you have on
17 your record?

18 A. Yes.

19 Q. I will mark as Maxwell 22 this
20 email?

21 (Maxwell Exhibit 22, email, marked
22 for identification.)

23 Q. This is dated January 21, 2015.
24 It's from Jeffrey Epstein to you, forwarding
25 the Guardian and I would like you to look at

1 G Maxwell - Confidential
2 the chain of emails so you understand the --
3 have an appreciation for who is on this.
4 It's a three-page document. The bottom of
5 the email appears to be a message from, there
6 is a -- at the very bottom there is the
7 signature block for Ross Gow, who I
8 understand is your press agent and above that
9 there is a message from a John Swaine to Ross
10 Gow.

11 Do you see that?

12 A. Uh-huh.

13 Q. Do you know who John Swaine is?

14 A. I do not.

15 Q. Above that there is a message from
16 Ross Gow to Philip Barden and you and it
17 says, so this isn't getting better, latest
18 from our chums at the Guardian and above that
19 you will see on January 21 an email from you
20 where you wrote, See below.

21 And right above that chain you will
22 see Jeffrey Epstein to you on January 21 and
23 his statement to you is, This will now end
24 but I think a dismissive statement is okay.

25 What did he mean by his statement,

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2 This will now end?

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

5 A. I have no idea.

6 Q. Did you discuss with him what he
7 meant by the statement, This will now end?

8 A. I don't recall.

9 Q. Was he taking any action to ensure
10 that, quote, this will now end?

11 A. I have no idea.

12 (Maxwell Exhibit 23, email, marked
13 for identification.)

14 Q. This is an email from, if you look
15 at the chain at the top, you will see it's
16 from you to Jeffrey on January 27 and the
17 email at the bottom of the chain is from
18 Jeffrey to you on January 27.

19 He states, What happened to you and
20 your statement, question mark, question mark.
21 And you put at the top, I have not decided
22 what to do.

23 A. Uh-huh.

24 Q. Why was Jeffrey interested in you
25 making a statement to the press?

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

4 A. I don't know that he was
5 interested. We made a statement and then I
6 was being advised to make an additional
7 statement and I never did.

8 Q. Was Jeffrey communicating with you
9 regularly on what additional statement you
10 might make?

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

13 A. No, I've communicated with him very
14 little, as little as possible.

15 Q. Why did you feel you had to keep
16 him informed of statements you were making to
17 the press?

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

20 A. I didn't feel I had to.

21 Q. Then why you were communicating
22 with him about statements you were making to
23 the press?

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

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2 A. Insofar as this is the case, it's
3 really all about Jeffrey, it's not a case
4 about me.

5 Q. In 2009, did you direct your
6 lawyer, either directly or indirectly, to
7 tell Brad Edwards that you were unavailable
8 to attend a deposition?

9 MR. PAGLIUCA: Objection to the
10 form and foundation. And this is a
11 privileged communication as I understand
12 the question, what someone said or
13 didn't say to their lawyer. So don't
14 answer the question.

15 Q. Can you answer that question
16 without revealing a privileged communication?

17 A. Can you ask the question again?

18 Q. In 2009, did you direct your lawyer
19 to tell Brad Edwards that you were
20 unavailable to attend a deposition?

21 MR. PAGLIUCA: Same instruction.

22 Q. Did you make any statement in 2009
23 to anybody that you were unavailable to
24 attend a deposition?

25 A. My mother was sick and I don't

1 G Maxwell - Confidential

2 recall exactly the sequence of events but
3 what sequence of events do exist are -- was
4 handled by my lawyers.

5 Q. What is your understanding of
6 Jeffrey Epstein's nonprosecution agreement?

7 A. I have no idea.

8 Q. Do you have an understanding of the
9 co-conspirators listed in the nonprosecution
10 agreement?

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

13 A. I have no knowledge of his
14 agreement, whatever that is.

15 Q. Do you know, you mentioned earlier
16 today that Sarah Kellen was one of the listed
17 co-conspirators.

18 Do you know who the other
19 co-conspirators are in the nonprosecution
20 agreement?

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

23 A. I do not know.

24 Q. What did Jeffrey Epstein tell you
25 about the nonprosecution agreement?

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2 A. I don't think I've ever discussed
3 it with him.

4 Q. How did you come to learn that
5 Sarah Kellen was covered by the
6 nonprosecution agreement?

7 A. I believe I read it in the press.

8 Q. Did you have any discussions with
9 Sarah Kellen with about the nonprosecution
10 agreement?

11 A. I have not had any discussions with
12 Sarah.

13 Q. When is the last time you spoke to
14 Sarah Kellen?

15 A. Maybe 2005, 2006 maybe.

16 Q. And same with Nadia Marcinkova,
17 when is the last time you recall speaking
18 with Nadia Marcinkova?

19 A. Probably even more time before
20 that, maybe -- I've never had communications
21 really with Nadia.

22 Q. I'm sorry, I didn't hear that.

23 A. I never had communications with
24 her.

25 Q. You were working for Jeffrey at the

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2 same time Nadia was also working for Jeffrey,
3 isn't that correct?

4 A. I didn't know what Nadia did for
5 Jeffrey so I didn't characterize what her
6 relationship or work or not was and I was
7 still helping him with his construction
8 projects and the like but I never crossed
9 paths with Nadia.

10 Q. What did you think Nadia was doing
11 for Jeffrey?

12 A. I have no idea what Nadia was doing
13 for Jeffrey.

14 Q. Did you observe Nadia at any of
15 Jeffrey's houses while you were there?

16 A. She was at the house on occasion.

17 Q. What would she be doing there?

18 A. I have no idea.

19 Q. Did you know if she lived at his
20 houses?

21 A. I have no idea.

22 Q. Did you ever go into a bedroom and
23 see her belongings at one of the houses?

24 A. Not that I recall, no.

25 Q. I'm going to mark this as Maxwell

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2 Exhibit 24?

3 (Maxwell Exhibit 24, email, marked
4 for identification.)

5 Q. You can see at the top of the first
6 page which is GM 0001, it's dated January 3,
7 2015 from you to the Duke of York.

8 Is that Prince Andrew who we
9 referred to today?

10 A. Yes.

11 Q. And can you tell me, it says, Have
12 some info. Call me when you have a moment.

13 What is redacted there?

14 A. I don't recall, I'm sorry.

15 Q. Do you know why there is a
16 redaction on this document?

17 A. You would have to confer with my
18 lawyers.

19 Q. What did you discuss on that call?

20 A. I don't have any specific knowledge
21 of that call.

22 Q. So the call is being made on
23 Saturday, January 3, 2015?

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

1 G Maxwell - Confidential

2 Q. The document states, it's Saturday
3 January 3, 2015. You issued your press
4 release on January 2, 2015.

5 Were you discussing with Prince
6 Andrew the subject of Virginia Roberts during
7 these calls?

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

10 A. I don't know if I spoke to him.

11 Q. I would like you to turn to GM 0002
12 and the bottom chain says Duke of York,
13 Saturday January 3, to [REDACTED] re, and he says
14 let me know when we can talk. Got some
15 specific questions to ask you about Virginia
16 Roberts.

17 Do you recall having a conversation
18 with Prince Andrew about Virginia Roberts in
19 or around early January of 2015?

20 A. I don't know if we actually spoke.

21 Q. Did you ever speak to Prince Andrew
22 about Virginia Roberts after you issued your
23 statement on January 2, 2015?

24 A. I know that we did speak at some
25 point but I don't recollect when we spoke.

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2 Q. What did you talk about?

3 A. Just what a liar she is.

4 Q. What did he say to you?

5 A. What a liar she is.

6 Q. Did he tell you why he thought she
7 was a liar?

8 A. I don't think he told me why she
9 was a liar. The substance of everything that
10 she said was a lie with regard to him.

11 Q. What did you say to him?

12 A. She is a liar.

13 Q. That was the whole conversation, it
14 was you said to him, she is a liar and he
15 said to you she say liar and did you discuss
16 any of the details about what those lies
17 were?

18 A. I don't recollect.

19 Q. Was that only one conversation you
20 had?

21 A. I don't recollect. I don't
22 recollect actually the conversation but other
23 than -- in detail other than we both said she
24 was a liar.

25 Q. Do you regularly communicate with

1 G Maxwell - Confidential

2 Prince Andrew?

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

5 A. What do you mean by regularly.

6 Q. Do you email with him once a month,
7 once every two months or text him or call
8 him?

9 A. No, we are not in that type of
10 regular touch.

11 Q. Do you travel with him regularly?

12 A. I don't know, I have traveled with
13 him. We have traveled together but regularly
14 is not a correct characterization.

15 Q. Do you travel with him more than
16 once a year?

17 A. There is no standard. There is no
18 set pattern. The answer to that was no.

19 Q. Have you ever observed him with any
20 underage, any women, female under the age of
21 18, interacting, that's not a child or a
22 family friend, interacting for the purposes
23 of a sexual relationship with that
24 individual?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I've never seen Andrew interact in
4 any way of that nature.

5 Q. Have you ever gone to dinner with
6 him with any individual under the age of 18
7 that's not a family member or friend of yours
8 that is under the age of 18?

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

11 A. We've been to dinner all the time,
12 I am not not sure who is at dinner with us, I
13 can't testify to that.

14 Q. Has he ever brought a female under
15 the age 18 that's not a relative of his --

16 A. He has children.

17 Q. I said not relatives.

18 A. I can't possibly testify to who he
19 comes to dinner with, I wouldn't recall.

20 Q. To your knowledge, has he ever had
21 a relationship with any female under the age
22 of 18 for purposes of a romantic relationship
23 to your knowledge?

24 A. I can't testify to Andrew's
25 relationship.

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2 Q. You haven't observed that?

3 A. No.

4 Q. Have you talked to Prince Andrew
5 about coming to testify at trial in this
6 case?

7 A. No.

8 Q. When was the last time you
9 communicated with Leslie Wexner?

10 A. 1994, 1995.

11 Q. I believe earlier, did you say that
12 you -- when is the last time you've been to
13 his home in Ohio?

14 A. I said -- you asked me if I stayed
15 the night.

16 Q. I'm asking you a different
17 question. When is the last time you have
18 been to his home in Ohio?

19 A. Roughly the same time, in the
20 middle of the '90s sometime, mid '90s.

21 Q. Not in the years 2000 to 2002?

22 A. Mid '90s.

23 Q. Have you ever communicated with any
24 representative of Leslie Wexner?

25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential

2 form and foundation.

3 A. I mean I've been to his -- in the
4 mid '90s, I would have communicated with
5 people who worked for him.

6 Q. Have you communicated with Leslie
7 Wexner about this case?

8 A. No.

9 Q. Have you ever seen a topless female
10 at any one of Jeffrey Epstein's properties?

11 MR. PAGLIUCA: Objection to the
12 form and foundation. You've asked this
13 question, by the way, earlier on today.

14 A. Again, I testified that there are
15 people who from time to time in the privacy
16 of a swimming pool have maybe taken a bikini
17 top off or something but it's not common and
18 certainly when I was at the house I don't
19 really recollect seeing that kind of
20 activity.

21 Q. Have you ever smoked cigarettes?

22 A. Yes.

23 Q. Have you ever smoked cigarettes
24 with Virginia Roberts?

25 A. I don't recall smoking cigarettes

1 G Maxwell - Confidential

2 with Virginia Roberts.

3 Q. I'm marking this as Maxwell 25.

4 (Maxwell Exhibit 25, email, marked
5 for identification.)

6 Q. I'm showing you what has been
7 marked as Maxwell 25.

8 This is an email dated January 11,
9 2015 at the top?

10 Do you see that that from Jeffrey
11 to you?

12 A. Uh-huh.

13 Q. And then below there is an email
14 from Philip Barden to you and cc'ing Ross Gow
15 on January 11, 2015.

16 Do you see that?

17 A. Uh-huh.

18 Q. It says, Dear Ghislaine, as you
19 know I have been working behind the scenes
20 and this article comes from that. It helps
21 but doesn't answer the VR claims. I will get
22 the criminal allegations out. This shows the
23 MOS will print truth, not just a VR voice
24 piece. We can only make the truth by making
25 a statement.

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2 What did he mean when he said, I
3 will get the criminal allegations out, what
4 was he referring to?

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

7 A. I have no idea.

8 Q. Were there criminal allegations
9 about Virginia that either your lawyer or
10 press agent were leaking to the press?

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

13 A. I have no idea.

14 Q. Did you ask him what he meant when
15 he said, I will get the criminal allegations
16 out?

17 A. I don't recollect the conversation.

18 Q. Did you direct him to leak to the
19 press criminal allegations about Virginia
20 Roberts?

21 A. I already testified that I have no
22 knowledge of what you are asking me.

23 Q. Were you copied on this email,
24 correct?

25 A. I was.

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2 Q. Did Jeffrey Epstein assist in
3 obtaining information about criminal
4 allegations relating to Virginia Roberts?

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

7 A. I have no recollection.

8 Q. Did Alan Dershowitz assist in
9 obtaining information regarding criminal
10 allegations of Virginia Roberts?

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

13 A. I have no knowledge of that.

14 Q. Did you ever discuss that with Alan
15 Dershowitz?

16 A. Discuss what?

17 Q. Criminal allegations about Virginia
18 Roberts.

19 A. I don't believe I have.

20 Q. Have you ever discussed allegations
21 relating to --

22 Q. Do you know if Jeffrey Epstein had
23 any relationship with the U.S. government
24 either working for the CIA or the FBI in his
25 lifetime?

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

4 A. I have no knowledge of that.

5 Q. Do you know if Jeffrey Epstein has
6 any friends that are in the CIA or FBI?

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

9 A. I have no idea.

10 Q. Are you aware of an investigation
11 of Jeffrey Epstein in the early '80s relating
12 to the SEC?

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

15 A. I have no knowledge of that.

16 Q. Are you aware that Jeffrey Epstein
17 has told people that he worked for the
18 government to recover stolen funds?

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

21 A. I don't recall conversations about
22 that.

23 Q. Has he ever told that you he worked
24 for the U.S. government?

25 A. I don't recollect that.

1 G Maxwell - Confidential

2 Q. You don't recollect or has he never
3 told you that?

4 A. I have no knowledge, I don't
5 recollect him telling me he worked for the
6 government.

7 Q. Does Jeffrey Epstein have any
8 affiliation with the Israeli government?

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

11 A. I have no knowledge of that.

12 Q. Do you know if he ever performed
13 any work for the Israeli government?

14 A. I have no knowledge of that.

15 Q. Have you ever visited Israel with
16 Jeffrey Epstein?

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

18 Q. You've seen the flight logs that I
19 provided you today. Are there, during the
20 time you worked for Jeffrey Epstein, were
21 there times that you flew on commercial
22 flights rather than Jeffrey Epstein's planes?

23 A. Yes.

24 Q. How often did that occur?

25 A. Decently.

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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 Dave Rogers was
5 not the pilot?

6 A. Dave Rogers 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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2 arrangements?

3 A. I don't recall.

4 Q. Were you ever responsible for
5 making those arrangements for other
6 individuals?

7 A. I don't recall making flight
8 arrangements.

9 Q. Was it a New York travel agent that
10 you would use for those arrangements?

11 A. Again, we are talking 16, 17, 18
12 years. I just don't recall anything to do
13 with travel agents.

14 Q. Would Jeffrey Epstein ever fly, for
15 example, Sarah Kellen on a commercial flight
16 to meet you in New Mexico?

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

19 A. I can't testify to that.

20 Q. Do you recall a trip where you met
21 Sarah Kellen in New Mexico?

22 A. No, I don't recall any specific
23 trip, no.

24 Q. Why would you be sent to New
25 Mexico, is there a reason why you would go

1 G Maxwell - Confidential

2 there in the course of the work you were
3 doing for Jeffrey?

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

6 A. I was never sent. I had a job to
7 do and I would have to go to New Mexico for
8 work.

9 Q. Would Sarah Kellen assist in that
10 project?

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

13 A. No. The project was largely
14 complete, largely complete by the end -- I
15 don't remember the dates exactly but it was
16 largely complete by the 1990s, 2000s.

17 Q. Do you know why Sarah Kellen would
18 be going to New Mexico to meet you?

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

21 A. I don't know. She worked for
22 Jeffrey.

23 MR. PAGLIUCA: I think we are out
24 of time, counsel.

25 THE VIDEOGRAPHER: It's true.

1 G Maxwell - Confidential

2 MS. McCAWLEY: I will state for the
3 record there were questions today that
4 remain unanswered because the witness
5 has been instructed not to answer those
6 questions and we will be raising our
7 objections with the court to be able to
8 have those questions answered in the
9 near future.

10 MR. PAGLIUCA: So we are clear, we
11 are designating this entire deposition
12 as confidential under the protective
13 order. That would cover the paralegal
14 whose been present as well as the court
15 reporter and the videographer and all
16 the lawyers in the room.

17 THE VIDEOGRAPHER: This concludes
18 today's proceedings. We are off the
19 record at 6:43 p.m.

20 (Time noted: 6:43 p.m.)

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CERTIFICATE

I HEREBY CERTIFY that the witness,
GHISLAINE MAXWELL, was duly sworn by me and
that the deposition is a true record of the
testimony given by the witness.



Leslie Fagin

Leslie Fagin,
Registered Professional Reporter
Dated: April 22, 2016

(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)

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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

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