

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

1 **Q And based on the fact that you learned the**
 2 **fact you had worked at Mar-a-Lago in 2000 -- you**
 3 **became aware in mid-2015 --**
 4 A Um-hum.
 5 **Q -- that you had met Ms. Maxwell in 2000,**
 6 **correct?**
 7 A That's --
 8 MR. EDWARDS: Object to the form.
 9 A That's correct.
 10 **Q (BY MS. MENNINGER) All right. And you**
 11 **became aware in mid-2015 that you were not 15 years**
 12 **old when you met Ghislaine Maxwell, correct?**
 13 MR. EDWARDS: Object to the form.
 14 A That's correct.
 15 **Q (BY MS. MENNINGER) Okay. And who**
 16 **provided you those Mar-a-Lago records in**
 17 **approximately mid-2015?**
 18 MR. EDWARDS: I'm going to object.
 19 And to the extent that this invades the
 20 attorney-client privilege, if it was your attorneys
 21 that you spoke to and learned this information or
 22 received this information from, then you're
 23 instructed not to answer.
 24 A I cannot answer that question.
 25 **Q (BY MS. MENNINGER) Did you yourself look**

1 **at records in the middle of 2015 regardless of who**
 2 **showed them to you?**
 3 MR. EDWARDS: Objection. And to the
 4 extent that they were showed to you or shared by any
 5 of your lawyers, you're instructed not to answer the
 6 question. It invades the attorney-client privilege.
 7 **Q (BY MS. MENNINGER) Did you look at**
 8 **Mar-a-Lago records in the middle of 2015 yourself?**
 9 MR. EDWARDS: She's not answering the
 10 question.
 11 MS. MENNINGER: On what grounds is she not
 12 answering the question?
 13 MR. EDWARDS: I just told you it invades
 14 the attorney-client privilege. If she learned --
 15 I will instruct her if she learned by some
 16 other way than her attorneys sharing the information
 17 with her, then she can answer the question.
 18 **Q (BY MS. MENNINGER) I'm asking you not to**
 19 **tell me whether your attorneys showed you the record.**
 20 **I'm asking you not to tell me the source of the**
 21 **record.**
 22 **I'm asking you if you personally in the**
 23 **middle of 2015 looked at Mar-a-Lago records?**
 24 MR. EDWARDS: Same objection.
 25 Same instruction.

1 **Q (BY MS. MENNINGER) I'm going to show you**
 2 **an exhibit filed on, I believe on or about**
 3 **February 6th of 2015. Defendant's Exhibit 4.**
 4 **(Exhibit 4 marked.)**
 5 MR. EDWARDS: Thank you.
 6 **Q (BY MS. MENNINGER) And drawing your**
 7 **attention to the heading line that says, Entered on**
 8 **the docket February 6th, 2015.**
 9 **Do you see that?**
 10 A Yes.
 11 **Q All right. And Declaration of Jane Doe 3,**
 12 **do you see that on the first page?**
 13 A Yes.
 14 **Q And it's in the CVRA case, correct, Jane**
 15 **Doe 1 and Jane Doe 2 versus United States of America?**
 16 A Yes.
 17 **Q All right. And do you recognize this**
 18 **document?**
 19 A Yes.
 20 **Q And what do you understand this document**
 21 **to be?**
 22 A I believe it's more reason to why I should
 23 have been added to the CVRA case.
 24 MR. EDWARDS: Objection to the relevance,
 25 Counsel.

1 **Q (BY MS. MENNINGER) Okay. And again, if**
 2 **you look to the last page of the document,**
 3 **paragraph 67 --**
 4 A The last page?
 5 **Q Yes, the very last.**
 6 A 67, yes.
 7 **Q All right. It says in paragraph 67: I**
 8 **declare under penalty of perjury that the foregoing**
 9 **is true and correct, right?**
 10 A Yes.
 11 **Q And it was executed on or about the**
 12 **5th day of February, 2015, correct?**
 13 A It's a bit smudged, but it kind of looks
 14 like a 5.
 15 **Q All right. And then there's a signature**
 16 **block that's redacted that says Jane Doe 3, correct?**
 17 A Correct.
 18 **Q Do you believe that you signed this**
 19 **document and it was later covered up by that block?**
 20 A Yes.
 21 **Q All right. And again, is there anything**
 22 **in this document that you believe today to not be**
 23 **true?**
 24 MR. EDWARDS: I just ask that you read
 25 through the entire document and answer the question.