

# EXHIBIT 4

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

----- X

\*\*CONFIDENTIAL\*\*

Videotaped deposition of GHISLAINE  
MAXWELL, taken pursuant to subpoena, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, 575 Lexington  
Avenue, New York, New York, commencing  
April 22, 2016, 9:04 a.m., on the above  
date, before Leslie Fagin, a Court  
Reporter and Notary Public in the State  
of New York.

---

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES:

BOIES SCHILLER & FLEXNER, LLP  
Attorneys for Plaintiff  
401 East Las Olas Boulevard  
Fort Lauderdale, Florida, 33301  
BY: SIGRID McCAWLEY, ESQUIRE  
MEREDITH SCHULTZ, ESQUIRE  
EMMA ROSEN, PARALEGAL

FARMER JAFFE WEISSING EDWARDS FISTOS &  
LEHRMAN, P.L.  
Attorneys for Plaintiff  
425 N. Andrews Avenue  
Fort Lauderdale, Florida 33301  
BY: BRAD EDWARDS, ESQUIRE

PAUL G. CASSELL, ESQUIRE  
Attorneys for Plaintiff  
383 South University Street  
Salt Lake City, Utah 84112

HADDON MORGAN FOREMAN  
Attorneys for Defendant  
150 East 10th Avenue  
Denver, Colorado 80203  
BY: JEFFREY S. PAGLIUCA, ESQUIRE  
LAURA A. MENNINGER, ESQUIRE

Also Present:  
James Christe, videographer

1 G Maxwell - Confidential

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 [REDACTED] 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

1 G Maxwell - Confidential

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 [REDACTED] 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 [REDACTED] to  
17 massage [REDACTED]

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

20 Q. Did you ever have sexual contact  
21 with [REDACTED]

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.

1 G Maxwell - Confidential

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 [REDACTED]

7 A. Again, she is an adult --

8 Q. I'm asking you, did you ever have  
9 sexual contact with [REDACTED]

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 [REDACTED] that was not consensual on  
16 [REDACTED] part?

17 MR. PAGLIUCA: You can answer  
18 nonconsensual.

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

21 Q. Not [REDACTED]

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.