

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

\*\*CONFIDENTIAL\*\*

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

- - -

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



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2 form and foundation of the question.

3 Q. You can answer the question.

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

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

12 A. I am a female.

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

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

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

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

25 Q. And when is the first time you

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

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

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

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

14 Q. When did you --

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

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

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

25 A. I believe I still was doing --

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

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

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

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

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

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

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

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

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

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

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

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

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

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2 30 girls --

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

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

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

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

15 A. I helped out from time to time.

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

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

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

23 Q. How about let's say 2005?

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

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2 knowledge there are 30 people --

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

10 Q. How about his New York home?

11 A. Same.

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

14 A. Define what you mean by girlfriend.

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

18 A. No.

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

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

24 Q. When would that have been?

25 A. Probably in the early '90s.

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

7 A. Break it down a lot please.

8 Q. I will do that.

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

11 A. Why don't you stop there.

12 Q. Let me finish my question.

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

17 That's the question?

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

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

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

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

14 Q. Answer my question.

15 A. I just did.

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

18 A. I don't recruit anybody.

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

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

23 Q. It's a yes or no.

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

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2 that he may have met socially through me.

3 Q. Did you ever introduce [REDACTED]

4 [REDACTED] to Virginia in London?

5 A. I understand her story about London

6 but again, her tissue of lies is extremely

7 hard to pick apart what is true and what

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

9 all but for her tissue stories about this

10 situation.

11 Q. So did you ever introduce [REDACTED]

12 [REDACTED] to Virginia in London?

13 A. I have no recollection.

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

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

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

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

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

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

6 A. I have --

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

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

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

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

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

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

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

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

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

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2 A. I've looked at it.

3 Q. Are you in that picture?

4 A. I am.

5 Q. [REDACTED]

6 [REDACTED]  
7 A. It is.

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

11 MS. McCAWLEY: The picture?

12 MR. PAGLIUCA: Yes.

13 MS. McCAWLEY: It has.

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

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

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

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

25 While you are looking for that, I

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

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

6 A. I do not.

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

10 A. I do not.

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

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

22 Q. You don't recall that.

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



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

5 MR. PAGLIUCA: Are you on [REDACTED]

6 MS. McCAWLEY: [REDACTED]

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

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

19 A. I have to object.

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

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

24 A. I would like to.

25 Q. Let me ask the question and if you

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

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

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

11 A. I don't.

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

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

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

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

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

24 A. Can you repeat the question?

25 Q. Did you regularly fly on Jeffrey

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

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

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

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

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

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

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

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

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

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

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

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

13 Q. That is not my question.

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

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

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

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

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

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

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

14 (Recess.)

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

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

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

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

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

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

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

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

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

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

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

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

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

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ACKNOWLEDGMENT OF DEPONENT

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

GHISLAINE MAXWELL \_\_\_\_\_ DATE

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

My commission expires:

Notary Public