

# **EXHIBIT A**

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

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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

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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,

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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 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 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