

EXHIBIT A

Agren Blando Court Reporting & Video, Inc.

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE

May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN, P.L.

By Brad Edwards, Esq.
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Appearing on behalf of the
Plaintiff

BOIES, SCHILLER & FLEXNER LLP

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Plaintiff

Agren Blando Court Reporting & Video, Inc.

1 APPEARANCES: (Continued)

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11 Defendant

12 Also Present:

13 Brenda Rodriguez, Paralegal
14 Nicholas F. Borgia, CLVS Videographer
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1 Q And you're talking about line 4?

2 A Line 4.

3 Q Paragraph 4 or line 4?

4 A Oh, sorry. Number 4, the paragraph
5 number 4.

6 Q Okay. And what part of paragraph 4 do you
7 now believe to be untrue?

8 A In approximately --

9 MR. EDWARDS: Object to the form.

10 You can answer.

11 A In approximately 1999 when I was 15 years
12 old I met Ghislaine Maxwell.

13 Q (BY MS. MENNINGER) Okay.

14 A I now know that it was 2000, that I was 16
15 years old when I met Ghislaine Maxwell.

16 Q So when you signed this document under
17 penalty of perjury stating that it was true, you no
18 longer believe that to be true, correct?

19 A It was an honest mistake. We had no idea
20 how to pinpoint without any kind of records or dates
21 or anything like that. I was just going back
22 chronologically through time. And that's the best
23 time that I thought it was. And now I know the
24 facts, so it's good to know.

25 Q So you now believe that a document you

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1 filed under oath is no longer true, correct?

2 MR. EDWARDS: Object to the form.

3 A I wouldn't say that it wasn't true. I was
4 just unaware of the times and the dates.

5 Q (BY MS. MENNINGER) Again, is there more
6 than one truth, Ms. Roberts?

7 A No, there's no more than one truth.

8 Q All right. So a document in which you
9 swore that you were 15 years old when you met
10 Ms. Ghislaine Maxwell is an untrue statement,
11 correct?

12 MR. EDWARDS: Object to the form.

13 A It's not that it's an untrue statement.
14 It was a mistake. So it wasn't intentionally trying
15 to say something that wasn't true. It was to my best
16 knowledge that I thought it was 1999. And when I got
17 my records from Mar-a-Lago I was able to find out
18 that it was 2000. And this was entered before I
19 found out the actual dates that I did work at
20 Mar-a-Lago.

21 Q (BY MS. MENNINGER) Okay. So a document
22 that you filed under oath --

23 A Um-hum.

24 Q -- is now, you believe to be untrue,
25 correct?

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1 MR. EDWARDS: Objection. Asked and
2 answered.

3 Q (BY MS. MENNINGER) You may answer.

4 MR. EDWARDS: Answer again.

5 A Again, I wouldn't say it's untrue. Untrue
6 would mean that I would have lied. And I didn't lie.
7 This was my best knowledge at the time. And I did my
8 very best to try to pinpoint time periods going back
9 such a long time ago.

10 It wasn't until I found the facts that I
11 worked at Mar-a-Lago in 2000 that I was able to
12 figure that out.

13 Q (BY MS. MENNINGER) And approximately when
14 did you learn those facts about the dates you worked
15 at Mar-a-Lago?

16 A I would say it was mid-2015.

17 Q Mid-2015 is the first time you became
18 aware of the dates --

19 A I don't know the exact --

20 Q If you could just let me finish.

21 A I'm sorry.

22 Q That's all right. Approximately mid-2015
23 when you learned the true dates that you had worked
24 at Mar-a-Lago?

25 A That's correct. Sorry.

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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