

EXHIBIT

A

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1 think I met Prince Andrew in 2001. And Glenn Dubin
2 and Stephen Kaufmann were, like I said, the first
3 people I was sent out to after my training. So I
4 don't know. I'm not going to give you an exact time
5 if I don't know it.

6 Q I asked you the relative order.

7 A And I'm trying to give you it.

8 Q And where does Alan Dershowitz fit into
9 that group of people?

10 A Same. I can't tell you piece by piece by
11 piece who -- I know Glenn Dubin was first.

12 Q Okay.

13 A And I know Stephen Kaufmann was one of the
14 first I was sent to. Alan Dershowitz could have been
15 between there. Between, sorry, between Glenn and
16 Stephen. The first time I was with Alan Dershowitz
17 was in New York, so I wasn't actually sent to him.
18 It actually happened at one of Jeffrey's residences.

19 (Ms. McCawley left the deposition.)

20 A So it's very hard for me to
21 chronologically give you each person individually.

22 Q (BY MS. MENNINGER) Okay. Name the other
23 politically connected and financially powerful people
24 that Ghislaine Maxwell told you to go have sex with?

25 A Again, I'm going to tell you "they"

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1 because that's how it went. They instructed me to go
2 to George Mitchell, Jean Luc Brunel, Bill Richardson,
3 another prince that I don't know his name. A guy
4 that owns a hotel, a really large hotel chain, I
5 can't remember which hotel it was. Marvin Minsky.

6 There was, you know, another foreign
7 president, I can't remember his name. He was
8 Spanish. There's a whole bunch of them that I
9 just -- it's hard for me to remember all of them.
10 You know, I was told to do something by these people
11 constantly, told to -- my whole life revolved around
12 just pleasing these men and keeping Ghislaine and
13 Jeffrey happy. Their whole entire lives revolved
14 around sex.

15 They call massages sex. They call
16 modeling sex. They call --

17 Q I asked you the names for people. Are you
18 going to tell me any other names or is that all of
19 them?

20 A I'm trying to think. That's the answer
21 I'm trying to give to you. It's that it's so hard to
22 just keep naming and naming and naming.

23 Q All right.

24 A A lot of times I would be introduced to
25 them. I didn't know --

Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789

215

1 DEPOSITION ERRATA SHEET

2

3 Assignment no: J0277789

4 Bradley J. Edwards and Paul G. Cassell

5 vs.

6 Alan M. Dershowitz

7

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8

DECLARATION UNDER PENALTY OF PERJURY

9

10 I declare under penalty of perjury that I
11 have read the entire transcript of my videotaped
12 deposition taken in the captioned matter or the same has
13 been read to me, and the same is true and accurate, save
14 and except for changes and/or corrections, if any, as
15 indicated by me on the DEPOSITION ERRATA SHEET hereof,
16 with the understanding that I offer these changes as if
17 still under oath.

18

19


Signed on the 11 day of February

20 2016.

21

22

23



24

VIRGINIA ROBERTS GIUFFRE

25

**Confidential/Sealed Transcript Pursuant to Court Order
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DEPOSITION ERRATA SHEET

Page No. 6 Line No. 17

Change to: "Yes. I signed the subpoena duces tecum."

Reason for change: Did not initially recognize the document

Page No. 6 Line No. 20

Change to: "No. My lawyers worked with me to collect documents and my understanding is that we turned those documents over to Dershowitz's counsel prior to the deposition."

Reason for change: Clarification of answer

Page No. 9 Line No. 9

Change to: "Yes."

Reason for change: Did not initially recognize the document

Page No. 11 Line No. 1

Change to: "Yes."

Reason for change: Misunderstood the question

Page 11 Line Nos. 4-5

Change to: "I'm confused. I don't know what foreign president you're talking about."

Reason for change: Misunderstood the question

Page No. 11 Line No. 23

Change to: "I understand well-known prime ministers and other world leaders; as far as foreign presidents, I believe so."

Reason for change: Misunderstood the question

Page No. 12 Line No. 2

Change to: "Yes, assuming South America is considered overseas."

Reason for change: Misunderstood the question

Page No. 12 Line No. 8

Change to: "As far as I know right now, yes, I was."

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Reason for change: Misunderstood the question

Page No. 38 Line No. 11

Change to: "I'll continue with the list here. Nadia Marcinkova I was not sent to her, but she was part of it with Jeff Epstein. Others on the list include Marvin Minsky and Tom Pritzker."

Reason for change: Clarification of answer

Page 38 Line 19

Change to: "Off the top of my head, once, but it could have been more."

Reason for change: Clarification of answer

Page No. 38 Line No. 21

Change to: "I believe Tom was at Mexico. I may have also been with him in other places."

Reason for change: Clarification of answer

Page No. 41 Line No. 8

Change to: "On an airplane and in a limo."

Reason for change: Clarification of answer

Page No. 41 Line No. 10

Change to: "One, each time."

Reason for change: Clarification of answer

Page No. 41 Line No. 12

Change to: "On airplane, blond, young."

Reason for change: Clarification of answer

Page No. 98 Line No. 16

Change to: "As you can see in that answer I'm not even sure. It wasn't six months, but between six months and a year which is why I'm saying nine months. It was an assumption. It could have been six weeks."

Reason for change: Clarification of answer

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Page No. 190 Line No. 22

Change to: “No, other than maybe you showing it to me today. It’s in my pile. It’s not in my pile, is it? I don’t know. I haven’t seen it. I was served with the subpoena, and I signed for it, and I reviewed it at that time.”

Reason for change: Clarification of answer

Page 191 Line 5

Change to: “Why would I do – no. I did collect documents and gave them to my lawyers in response to this subpoena. And my understanding is those documents were produced.”

Reason for change: Misunderstood the question

Page 191 Line 20

Change to: “Yes, but I did not have any pictures of myself with Professor Dershowitz.”

Reason for change: Misunderstood the question