

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

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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.

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

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 2 meet Mr. Epstein?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 Q. You can answer.
 6 A. I just explained.
 7 A. I spent the entire time talking to
 8 Virginia's mother outside the house so the
 9 answer to the question is no.
 10 Q. No, did you not walk her up and
 11 introduce her to Mr. Epstein?
 12 A. I just said no.
 13 Q. Did you participate in a massage
 14 this first time when she first came to the
 15 home and you were speaking with her mother,
 16 she was in the home, is that correct, you
 17 brought her into the home?
 18 MR. PAGLIUCA: Object to the form
 19 and foundation.
 20 A. I will repeat again, I was standing
 21 outside with her mother so very difficult for
 22 me to do anything else at that time so no, I
 23 did not take her upstairs.
 24 Q. Did you participate --
 25 A. Virginia lied 100 percent about

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 2 absolutely everything that took place in that
 3 first meeting. She has lied repeatedly,
 4 often and is just an awful fantasist. So
 5 very difficult for anything to take place
 6 that she repeated because I was with her
 7 mother the entire time.
 8 Q. So did you have -- did you give a
 9 massage with Virginia Roberts and Mr. Epstein
 10 during the first time Virginia Roberts was at
 11 the West Palm Beach house?
 12 MR. PAGLIUCA: Object to the form
 13 and foundation.
 14 Q. Yes or no?
 15 A. No.
 16 Q. Have you ever given a massage with
 17 Virginia Roberts in the room and Jeffrey
 18 Epstein?
 19 MR. PAGLIUCA: Object to the form
 20 and foundation.
 21 A. No.
 22 Q. Have you ever given Jeffrey Epstein
 23 a massage?
 24 MR. PAGLIUCA: Object to the form,
 25 foundation. And I'm going to instruct

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 2 you not to answer that question. I
 3 don't have any problem with you asking
 4 questions about what the subject matter
 5 of this lawsuit is, which would be, as
 6 you've termed it, sexual trafficking of
 7 Ms. Roberts.
 8 To the extent you are asking for
 9 information relating to any consensual
 10 adult interaction between my client and
 11 Mr. Epstein, I'm going to instruct her
 12 not to answer because it's not part of
 13 this litigation and it is her private
 14 confidential information, not subject to
 15 this deposition.
 16 MS. McCAWLEY: You can instruct her
 17 not to answer. That is your right. But
 18 I will bring her back for another
 19 deposition because it is part of the
 20 subject matter of this litigation so she
 21 should be answering these questions.
 22 This is civil litigation, deposition and
 23 she should be responsible for answering
 24 these questions.
 25 MR. PAGLIUCA: I disagree and you

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 2 understand the bounds that I put on it.
 3 MS. McCAWLEY: No, I don't. I will
 4 continue to ask my questions and you can
 5 continue to make your objections.
 6 Q. Did you ever participate from the
 7 time period of 1992 to 2009, did you ever
 8 participate in a massage with Jeffrey Epstein
 9 and another female?
 10 MR. PAGLIUCA: Objection. Do not
 11 answer that question. Again, to the
 12 extent you are asking for some sort of
 13 illegal activity as you've construed in
 14 connection with this case I don't have
 15 any problem with you asking that
 16 question. To the extent these questions
 17 involve consensual acts between adults,
 18 frankly, they're none of your business
 19 and I will instruct the witness not to
 20 answer.
 21 MS. McCAWLEY: This case involves
 22 sexual trafficking, sexual abuse,
 23 questions about her having interactions
 24 with other females is relevant to this
 25 case. She needs to answer these

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 2 questions.
 3 MR. PAGLIUCA: I'm instructing her
 4 not to answer.
 5 MS. McCAWLEY: Then we will be back
 6 here again.
 7 Q. Have you ever given a massage to
 8 Mr. Epstein with a female that was under the
 9 age of 18?
 10 A. Can you repeat the question?
 11 Q. Yes. Have you ever given a massage
 12 to Mr. Epstein with a female that was under
 13 the age of 18?
 14 A. No.
 15 Q. Have you ever observed Mr. Epstein
 16 having a massage given by an individual, a
 17 female, who was under the age of 18?
 18 A. No.
 19 Q. Have you ever observed females
 20 under the age of 18 in the presence of
 21 Jeffrey Epstein at his home?
 22 MR. PAGLIUCA: Object to the form
 23 and foundation.
 24 A. Again, I have friends that have
 25 children --

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 2 Q. I'm not talking about friends. I'm
 3 talking about individuals --
 4 MR. PAGLIUCA: I'm going to object
 5 to you interrupting the witness who was
 6 answering your question. The question
 7 was, have you ever seen anyone, female
 8 under the age of 18 at the house and
 9 that's the question she was answering.
 10 If you want to strike that question and
 11 ask another question, feel free, but let
 12 the witness respond, please.
 13 MS. McCAWLEY: I will do that.
 14 Q. Have you ever observed a female
 15 under the age of 18 at Jeffrey Epstein's home
 16 that was not a friend, a child -- one of your
 17 friend's children?
 18 A. Again, I can't testify to that
 19 because I have no idea what you are talking
 20 about.
 21 Q. You have no idea what I'm talking
 22 about in the sense you never observed a
 23 female under the age of 18 at Jeffrey
 24 Epstein's home that was not one of your
 25 friend's children, is that correct?

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 2 MR. PAGLIUCA: Object to the form
 3 and foundation.
 4 A. How would I possibly know how
 5 someone is when they are at his house. You
 6 are asking me to do that. I cannot possibly
 7 testify to that. As far as I'm concerned,
 8 everyone who came to his house was an adult
 9 professional person.
 10 Q. Are you familiar with the police
 11 report that was issued in respect to the
 12 investigation in this matter?
 13 MR. PAGLIUCA: Object to the form
 14 and foundation.
 15 Q. Are you familiar with the police
 16 report that was used in this matter, the
 17 investigation of Jeffrey Epstein, has been
 18 produced as a document in this matter?
 19 A. I have seen a police report.
 20 (Maxwell Exhibit 1, police report,
 21 marked for identification.)
 22 Q. The police report that you have in
 23 front of you, can you turn to page 28 of that
 24 report, the numbers are on the top right-hand
 25 corner.

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 2 You will see some redactions in
 3 this report, Ms. Maxwell, the redacted
 4 information is redacted because it reveals
 5 the name of a minor, someone who is under the
 6 age of 18.
 7 On page 28, in the third paragraph,
 8 about halfway down, it says, [REDACTED] stated
 9 she performed the massage naked. At the
 10 conclusion of this massage, Epstein paid
 11 [REDACTED] \$200 for the massage. He explained, I
 12 know you are not comfortable but I will pay
 13 you if you bring some girls. He told her the
 14 younger the better. [REDACTED] stated once tried
 15 to bring a 23 year old to Epstein and he
 16 stated the female was too old.
 17 Have you heard Mr. Epstein use the
 18 phrase the younger the better?
 19 A. I have no recollection of hearing
 20 that.
 21 Q. Have you used the phrase in talking
 22 to [REDACTED] and asking her to recruit
 23 females for Mr. Epstein, the younger the
 24 better?
 25 MR. PAGLIUCA: Object to the form

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 2 Q. Was she under 18 when you first met
 3 her?
 4 A. I have no idea how old she was when
 5 I first met her.
 6 Q. Did she look like a child when you
 7 first met her?
 8 A. I don't remember what she looked
 9 like at the time she was in the house.
 10 Q. How many years have you known her?
 11 A. I can only recall the last time I
 12 saw her.
 13 Q. When was the first time you met
 14 her?
 15 A. Again, I just told you, I don't
 16 recall the first time I met her.
 17 Q. Did [REDACTED] travel with you
 18 on Jeffrey's planes?
 19 A. I wouldn't remember if [REDACTED] was on
 20 the plane or not.
 21 Q. Did you ever have sex with [REDACTED]
 22 [REDACTED] ?
 23 A. No.
 24 Q. Did you ever observe Jeffrey having
 25 sex with [REDACTED] ?

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 2 A. No.
 3 Q. Were you aware that Jeffrey was
 4 having sexual contact with [REDACTED] when
 5 she was 13 years old?
 6 MR. PAGLIUCA: Object to the form
 7 and foundation.
 8 A. I would be very shocked and
 9 surprised if that were true.
 10 Q. Were you in the house when [REDACTED]
 11 [REDACTED] was in the house in a private area
 12 with Jeffrey Epstein?
 13 MR. PAGLIUCA: Object to the form
 14 and foundation.
 15 A. Can you repeat the question.
 16 Q. Were you ever in the Palm Beach
 17 house when Jeffrey Epstein was in the house
 18 with [REDACTED] ?
 19 MR. PAGLIUCA: Object to the form
 20 and foundation.
 21 A. I've already testified that I have
 22 met her and that she was there [REDACTED]
 23 [REDACTED] I don't understand what your
 24 question is asking.
 25 Q. So you have never seen [REDACTED]

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 2 [REDACTED] ?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 Q. Is that your testimony?
 6 A. I already said I don't recall all
 7 the times I've seen her and I have no memory
 8 of that.
 9 Q. Have you ever seen [REDACTED] in
 10 the house with Jeffrey Epstein [REDACTED]
 11 [REDACTED] ?
 12 MR. PAGLIUCA: Object to the form
 13 and foundation.
 14 A. I just told you I don't recall
 15 seeing [REDACTED] .
 16 Q. Were you ever involved in an orgy
 17 with [REDACTED] ?
 18 A. No, absolutely not.
 19 Q. Can you tell me, do you know an
 20 individual by the name of [REDACTED] ?
 21 A. I do.
 22 Q. How did you meet [REDACTED] ?
 23 A. At some point she was a friend of
 24 Jeffrey's and I recall meeting her at some
 25 point.

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 2 Q. Did you hire her?
 3 A. First of all, I don't hire girls
 4 like that, so let's be clear, I already
 5 testified to that, and I have no idea what
 6 you are referring to.
 7 Q. When you say girls like that, what
 8 do you mean?
 9 A. I hire people who are professional
 10 at the house. You are asking if I hired
 11 somebody to do what, I don't know what you
 12 are talking about. I hired people to work in
 13 the homes.
 14 Q. What was Nadia Marcinkova doing?
 15 MR. PAGLIUCA: Object to the form
 16 and foundation.
 17 A. I have no idea what Nadia
 18 Marcinkova was doing. I didn't hire her and
 19 I don't know what you are referring to.
 20 Q. You met Nadia Marcinkova?
 21 A. I testified I did.
 22 Q. Did she work for Jeffrey Epstein?
 23 A. I have no idea what she did.
 24 Q. Have you flown on planes with Nadia
 25 Marcinkova?

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 2 Q. Did Jeffrey arrange for a visa for
 3 [REDACTED] ?
 4 A. I don't know what Jeffrey did. I
 5 cannot testify what Jeffrey did.
 6 Q. Was [REDACTED] involved in sex with
 7 Jeffrey and other girls?
 8 MR. PAGLIUCA: Object to the form
 9 and foundation.
 10 Q. Girls under the age of 18?
 11 MR. PAGLIUCA: Same objection.
 12 A. I have no idea.
 13 Q. Was [REDACTED] involved with sex with
 14 Jeffrey and girls over the age of 18?
 15 MR. PAGLIUCA: Same objection.
 16 A. I have no idea.
 17 Q. Did [REDACTED] recruit other girls for
 18 sex with Jeffrey?
 19 MR. PAGLIUCA: Object to the form
 20 and foundation.
 21 A. I have no idea.
 22 Q. Do you still talk to [REDACTED] ?
 23 A. No.
 24 Q. [REDACTED] ?
 25 A. I have no idea.

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 2 Q. [REDACTED]
 3 [REDACTED] ?
 4 A. I have no idea.
 5 Q. Are you a pilot?
 6 A. I am.
 7 Q. Have you flown with [REDACTED] ?
 8 A. I have.
 9 Q. Have you flown with [REDACTED]
 10 [REDACTED] ?
 11 A. What do you mean by flown?
 12 Q. Have you been on planes with her?
 13 A. I already testified I don't recall
 14 having her on a plane with me.
 15 Q. Do you know [REDACTED] ?
 16 A. I do.
 17 Q. When did you first meet her?
 18 A. I don't recall exact dates.
 19 Q. Did you meet her with the purpose
 20 of hiring her to work for Jeffrey or having
 21 Jeffrey hire her?
 22 MR. PAGLIUCA: Object to the form
 23 and foundation.
 24 A. No.
 25 Q. What was her relationship with

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 2 Jeffrey?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 A. I don't know exactly the nature of
 6 her relationship but she worked for him.
 7 Q. What did she do?
 8 MR. PAGLIUCA: Object to the form
 9 and foundation.
 10 A. At the time she when was with him I
 11 believe she traveled with him and helped with
 12 his travel arrangements.
 13 Q. Did she bring girls to the house to
 14 give massages to Jeffrey?
 15 MR. PAGLIUCA: Object to the form
 16 and foundation.
 17 A. I don't know what [REDACTED] did.
 18 Q. So you never observed [REDACTED]
 19 bringing girls to the home to give massages
 20 to Jeffrey?
 21 MR. PAGLIUCA: Object to the form
 22 and foundation.
 23 A. I don't understand the question,
 24 what did you mean bring?
 25 Q. Did you ever observe [REDACTED]

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 2 inviting, bringing, walking anyone into the
 3 home to give a massage for Jeffrey?
 4 MR. PAGLIUCA: Object to the form
 5 and foundation.
 6 A. I don't recollect anything like
 7 that.
 8 Q. Are you aware that [REDACTED] was
 9 a co-conspirator, named as a co-conspirator
 10 in the case involving Jeffrey Epstein?
 11 MR. PAGLIUCA: Object to the form
 12 and foundation and also calls for a
 13 legal conclusion.
 14 MS. McCAWLEY I'm just asking if she
 15 is aware of that.
 16 A. I am aware.
 17 Q. Who paid [REDACTED] ?
 18 A. I have no idea.
 19 Q. Did you ever arrange payment for
 20 any of the employees at the home?
 21 MR. PAGLIUCA: Object to the form.
 22 A. What do you mean by arrange?
 23 Q. Were you ever in charge or
 24 responsible for paying individuals at the
 25 home, that worked there?

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 2 A. I have.
 3 Q. No, you haven't.
 4 A. Yes, I have.
 5 Q. You are refusing to answer the
 6 question.
 7 A. Let's move on.
 8 Q. I'm in charge of the deposition. I
 9 say when we move on and when we don't.
 10 You are here to respond to my
 11 questions. If you are refusing to answer the
 12 court will bring you back for another
 13 deposition to answer these questions.
 14 Do you understand that?
 15 MR. PAGLIUCA: You don't need to
 16 threaten the witness.
 17 MS. McCAWLEY: I'm not threatening
 18 her. I'm making sure the record is
 19 clear.
 20 MR. PAGLIUCA: Certainly can you
 21 apply to have someone come back and the
 22 court may or may not have her come back
 23 again.
 24 Again, she is not answering
 25 questions that relate to adult consent

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 2 sex acts. Period. And that's the
 3 instruction and we can take it up with
 4 the court.
 5 Q. Ms. Maxwell, are you aware of any
 6 sexual acts with masseuses and Jeffrey
 7 Epstein that were nonconsensual?
 8 A. No.
 9 Q. How do you know that?
 10 A. All the time that I have been in
 11 the house I have never seen, heard, nor
 12 witnessed, nor have reported to me that any
 13 activities took place, that people were in
 14 distress, either reported to me by the staff
 15 or anyone else. I base my answer based on
 16 that.
 17 Q. Are you familiar with a person by
 18 the name of [REDACTED]?
 19 A. I am.
 20 Q. Has [REDACTED] given a statement
 21 to police about you performing sexual acts on
 22 her?
 23 A. I have not heard that.
 24 Q. Has [REDACTED] given a statement
 25 to police about Jeffrey Epstein performing

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 2 sexual acts on her?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 A. I have not heard that.
 6 Q. How do you know [REDACTED]?
 7 A. [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 Q. Was [REDACTED] under the age of
 11 18?
 12 MR. PAGLIUCA: Object to the form
 13 and foundation.
 14 A. I don't recall how old [REDACTED]
 15 was.
 16 Q. Did she tell police that Jeffrey
 17 Epstein assaulted her sexually?
 18 MR. PAGLIUCA: Object to the form
 19 and foundation.
 20 A. I never heard that.
 21 Q. Did [REDACTED] recruit or bring
 22 girls to the home that were under the age of
 23 18?
 24 MR. PAGLIUCA: Object to the form
 25 and foundation and I think this has been

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 2 asked and answered already.
 3 Q. You can answer the question.
 4 A. I have no idea what [REDACTED]
 5 did.
 6 Q. You never observed [REDACTED]
 7 with girls under the age of 18 at Jeffrey's
 8 home?
 9 MR. PAGLIUCA: Object to the form
 10 and foundation.
 11 A. The answer is no, I have no idea.
 12 Q. Do you know [REDACTED]?
 13 A. I do.
 14 Q. What is your relationship with
 15 [REDACTED]?
 16 MR. PAGLIUCA: Object to the form.
 17 A. What do you mean what is my
 18 relationship.
 19 Q. Are you friendly with him, how do
 20 you know him?
 21 A. He is the husband of [REDACTED].
 22 Q. Is [REDACTED] one of your friends?
 23 A. Yes.
 24 Q. Did you ever send Virginia to
 25 [REDACTED] to give him a

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 2 massage?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. No.
 6 Q. Did you ever instruct Virginia
 7 Roberts to have sex with [REDACTED]?
 8 MR. PAGLIUCA: Objection to the
 9 form and foundation.
 10 A. I have never instructed Virginia to
 11 have sex with anybody ever.
 12 Q. How old was [REDACTED] when she
 13 met Jeffrey?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation.
 16 A. I have no idea.
 17 Q. What's she under the age of 18?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I just testified I have idea how
 21 old she was.
 22 Q. You testified she was your friend.
 23 You don't know how old she was when she met
 24 Jeffrey?
 25 A. That happened sometime in the '70s,

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 2 how would I know, or '80s. I have no idea.
 3 Can you testify to what your friends did 30
 4 years ago?
 5 Q. You don't ask the questions here,
 6 Ms. Maxwell.
 7 What about [REDACTED], when
 8 did you first meet [REDACTED]?
 9 A. I don't recall the exact date.
 10 Q. Did you hire [REDACTED]?
 11 A. I don't hire people, she came to
 12 work at the house to answer phones.
 13 Q. Where did you meet her?
 14 A. I just testified, I don't recall
 15 exactly when I met her.
 16 Q. Was one of your job
 17 responsibilities to interview people that
 18 would be then hired by Jeffrey?
 19 A. That was one of my
 20 responsibilities.
 21 Q. Do you recall interviewing [REDACTED]?
 22 A. I don't recall the exact interview,
 23 no.
 24 Q. Do you know what tasks [REDACTED] was
 25 hired to performance?

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 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

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 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.

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 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.

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 2 Q. So if [REDACTED] were to testify that
 3 she did not consent to a sexual act that you
 4 participated in --
 5 A. I just told you I have never ever
 6 under any circumstances with anybody, at any
 7 time, in anyplace, in any form had
 8 nonconsensual relations with anybody.
 9 Q. Did you introduce [REDACTED]
 10 [REDACTED]?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I've, again, read that [REDACTED]
 14 claimed that she met or that she said she met
 15 [REDACTED]. I don't know if I was the one
 16 who made the introduction or not.
 17 Q. Do you know a female by the name of
 18 [REDACTED]?
 19 A. I do.
 20 Q. How do you know her?
 21 A. [REDACTED].
 22 Q. So she worked for you?
 23 A. Yes.
 24 Q. Did you hire her?
 25 A. Again, Jeffrey hired people.

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 2 Q. Did you have sex with her?
 3 MR. PAGLIUCA: This is the same
 4 instruction about consensual or
 5 nonconsensual.
 6 Q. Was [REDACTED] under the age of 18 when
 7 you hired her?
 8 A. No. I didn't hire her, as I said,
 9 Jeffrey did.
 10 Q. Did [REDACTED] ever have sex with
 11 Jeffrey?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. How would I know what somebody else
 15 did.
 16 Q. You weren't involved in the sex
 17 between Jeffrey, [REDACTED] and yourself?
 18 A. We already --
 19 Q. Were you involved with sex between
 20 Jeffrey, [REDACTED] and yourself?
 21 MR. PAGLIUCA: Everyone is talking
 22 over each other. You heard the
 23 question.
 24 Again, you you know what the
 25 instruction is. If there is any

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 2 consensual issue involved, I instruct
 3 you not to answer.
 4 A. Moving on.
 5 Q. So you are refusing to answer that
 6 question?
 7 A. I've been instructed by my lawyer.
 8 Q. Did you ever have sex with Jeffrey,
 9 [REDACTED] Virginia and yourself when Virginia was
 10 underage?
 11 A. Absolutely not.
 12 MR. PAGLIUCA: We've been going for
 13 about an hour. I would like to take a
 14 five-minute break, please.
 15 MS. McCAWLEY: I'm almost done.
 16 MR. PAGLIUCA: You are not going to
 17 allow a break.
 18 MS. McCAWLEY: As soon as I get
 19 through my line of questioning, which is
 20 perfectly appropriate.
 21 Q. Did [REDACTED] travel with you and
 22 Jeffrey to Europe?
 23 A. I'm sure she did.
 24 Q. What is she doing today?
 25 A. I have no idea.

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 2 over to the house in Palm Beach to give
 3 massages?
 4 A. It's important to understand that I
 5 wasn't with Jeffrey all the time. In fact, I
 6 was only in the house less than half the
 7 time, so I cannot testify to when I wasn't in
 8 the house how often she came when I wasn't
 9 there.
 10 What I can say is that I barely
 11 would remember her, if not for all of this
 12 rubbish, I probably wouldn't remember her at
 13 all, except she did come from time to time
 14 but I don't recollect her coming as often as
 15 she portrayed herself.
 16 Q. How many times a day on an average
 17 day would Jeffrey Epstein get a massage?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. When I was at the house and when I
 21 was there with him, he received a massage, on
 22 average, about once a day.
 23 Q. Just once?
 24 A. Yes.
 25 Q. Were there days when he received

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 2 four or five?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. When I was present at the house, I
 6 never saw something like that.
 7 Q. Do you know if Virginia was
 8 required to be on call at all times to come
 9 to the house if Jeffrey wanted her there?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I have no idea of the arrangements
 13 that Virginia made with Jeffrey.
 14 Q. When Virginia was in New York,
 15 would Virginia sleep at Jeffrey's mansion in
 16 New York?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. I don't recollect her being in New
 20 York and I have no idea where she slept.
 21 Q. You don't ever remember seeing
 22 Virginia Roberts in New York?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. I would barely recollect her at

1 G Maxwell - Confidential
 2 all, except for this story.
 3 Q. Do you recall Virginia Roberts
 4 calling you because she was having a medical
 5 crisis and you and Jeffrey taking her to the
 6 hospital?
 7 A. I have heard this absurd story and
 8 if any part of it were true I would remember
 9 that. I do not.
 10 Q. You don't remember taking her to
 11 the hospital?
 12 A. It's not that I don't remember it,
 13 it didn't happen.
 14 Q. How do you know it didn't happen?
 15 A. That's the sort of memory you would
 16 recall.
 17 Q. Do you recall, you said you don't
 18 remember her being at the New York mansion.
 19 When you were in New York would you stay at
 20 the New York mansion with Jeffrey?
 21 A. I stayed from time to time.
 22 Q. Do you recall Virginia being at the
 23 New York mansion when [REDACTED] came to
 24 visit?
 25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential
 2 form and foundation.
 3 A. Like I told you, I don't recall her
 4 being at the house at all.
 5 Q. How many homes does Jeffrey have?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. When I was working for him, I think
 9 he had six maybe.
 10 Q. Would Virginia stay with him in
 11 those homes?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I can only testify for when I was
 15 present with him and I cannot say what she
 16 did when I wasn't present with him.
 17 Q. When you were present, would
 18 Virginia stay in the homes with him?
 19 A. I don't recall her staying in the
 20 houses.
 21 Q. Did you train Virginia on how to
 22 recruit other girls for massages?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. No.

1 G Maxwell - Confidential
 2 Q. Did you train Virginia on how to
 3 recruit other girls to perform sexual
 4 massages?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. No. And it's absurd and her entire
 8 story is one giant tissue of lies and
 9 furthermore, she herself has -- if she says
 10 that, you have to ask her about what she did.
 11 Q. Does Jeffrey like to have his
 12 nipples pinched during sexual encounters?
 13 MR. PAGLIUCA: Objection to form
 14 and foundation.
 15 A. I'm not referring to any advice on
 16 my counsel. I'm not talking about any adult
 17 sexual things when I was with him.
 18 Q. When Jeffrey would have a massage,
 19 would he request that the masseuse pinch his
 20 nipples while he was having a massage?
 21 A. I'm not talking about anything with
 22 consensual adult situation.
 23 Q. What about with underage --
 24 A. I am not aware of anything.
 25 Q. You are not aware of Jeffrey

1 G Maxwell - Confidential
 2 Epstein ever having sex with an underage
 3 minor and asking them to pinch his nipples?
 4 A. I am not.
 5 Q. So I'm going to direct you to, I
 6 believe it's Maxwell Exhibit 1, the police
 7 report.
 8 Are you aware that over 30 under
 9 age minors gave testimony to police that they
 10 were engaged in sexual acts during,
 11 quote-unquote, massages.
 12 MR. PAGLIUCA: The witness needs to
 13 find Exhibit 1. Exhibit 1 -- if you can
 14 hand me that please.
 15 Q. So now with respect to the police
 16 report, are you aware that over 30 underage
 17 girls, meaning under the age of 18 gave
 18 reports to police that they were assaulted
 19 sexually by Jeffrey Epstein during massages?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I read the police report. That's
 23 all I can testify to.
 24 Q. Are you aware of what is in the
 25 police report? Are you aware that there were

1 G Maxwell - Confidential
 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.

1 G Maxwell - Confidential
 2 Q. How about 2004?
 3 A. I was present for his mother's --
 4 his mother died in 2004 so I was there for
 5 his mother's death and the funeral and I was
 6 at the house maybe a handful of days, again.
 7 Q. I would like to direct you to, you
 8 have it pulled together now, it's page 39,
 9 Bates stamped Giuffre 00040?
 10 A. Can you repeat that, please.
 11 Q. Sure. 00040.
 12 A. Yes.
 13 Q. At the top of that document, about
 14 three lines down, you see the redacted
 15 portions where there is black so it blacks
 16 out the name.
 17 A. I see black redacted portions.
 18 Q. That's a black redaction of the
 19 name of the minor and there is -- I will
 20 represent for the record that's what it is.
 21 You can contest that but I'm not asking about
 22 the name of the minor.
 23 Five lines down, it says, She was
 24 just 16 years of age.
 25 Do you see that?

1 G Maxwell - Confidential
 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

1 G Maxwell - Confidential
 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

1 G Maxwell - Confidential
 2 testify to actual language.
 3 Q. So you won't testify to anything
 4 I'm asking you 17 years ago about a statement
 5 you made. How do you know it's 17 years ago?
 6 A. We are talking about a time in
 7 2000, right?
 8 Q. Have you ever said that to anybody?
 9 A. I'm 54 years old so you are asking
 10 me in my entire life, what words are you
 11 asking me in my entire life?
 12 Q. Your entire life is limited by the
 13 time you were with Jeffrey, this is the
 14 question.
 15 A. Let's time limit the question you
 16 are asking me.
 17 Q. So from, let's say, I think you
 18 said you started with him in 1992, is that
 19 correct, and finished with him in 2009.
 20 So from 1992 to 2009 have you ever
 21 said to anybody that you recruit other and we
 22 will start with girls to take the pressure
 23 off you to have sex with Jeffrey?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

1 G Maxwell - Confidential
 2 A. First of all I resent and despise
 3 the world recruit. Would you like to define
 4 what you mean by recruit and by girls, you
 5 mean underage people. I never had to do
 6 anything with underage people. So why don't
 7 you reask the question in a way that I am
 8 able to answer it.
 9 Q. I'm asking if you ever said that to
 10 anybody. So if you don't understand the word
 11 recruit and you never used that word then the
 12 answer to that question would be no.
 13 A. I have no memory as I sit here
 14 today having used that word.
 15 Q. Did you ever meet an underage girl
 16 in London to introduce her to Jeffrey to
 17 provide him with a massage?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. Run that past me one more time.
 21 Q. Did you ever meet an underage girl
 22 in London to introduce her to Jeffrey to
 23 perform a massage?
 24 MR. PAGLIUCA: Same objection.
 25 A. Are you asking me if I met anybody

1 G Maxwell - Confidential
 2 that was underage in London specifically to
 3 provide a massage to Jeffrey, is that your
 4 question?
 5 Q. Yes.
 6 A. No.
 7 Q. Do you know who [REDACTED] is?
 8 A. I don't recall her right now.
 9 Q. Do you know if -- strike that.
 10 During the time that you were
 11 working for Jeffrey, did you ever observe any
 12 foreign females, so in other words, not from
 13 the United States, that were brought to
 14 Jeffrey's home to perform massages?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. Females, what age are we talking?
 18 Q. Any age.
 19 A. Can you repeat the question?
 20 Q. During the time you were working
 21 for Jeffrey, did you ever observe any foreign
 22 females of any age that were at Jeffrey's
 23 home to perform a massage?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

1 G Maxwell - Confidential
 2 A. Are you asking me if any foreigner,
 3 not an American person, gave Jeffrey a
 4 massage?
 5 Q. Yes.
 6 A. Well, as I sit here today, I can't
 7 think of anyone who is foreign. Certainly --
 8 I just can't think of anybody right this
 9 second.
 10 Q. How about any foreign girls who
 11 were under the age of 18?
 12 A. I already testified to not knowing
 13 anything about underage girls.
 14 Q. Were there foreign girls who were
 15 brought to Jeffrey's home by [REDACTED]
 16 for the purposes of providing massages?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. I am not aware of [REDACTED] bringing
 20 girls. I have not no idea what you are
 21 talking about.
 22 Q. You have never been around foreign
 23 girls who are under the age of 18 at
 24 Jeffrey's homes?
 25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential
 2 form and foundation.
 3 A. I already testified about not
 4 knowing about underage girls.
 5 Q. Did you provide any assistance with
 6 obtaining visas for foreign girls that were
 7 under the age of 18?
 8 A. I've never participated in helping
 9 people of any age to get visas.
 10 Q. Did Jeffrey, was it Jeffrey's
 11 preference to start a massage with sex?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I think you should ask that
 15 question of Jeffrey.
 16 Q. Do you know?
 17 A. I don't believe that was his
 18 preference. I think -- you have to
 19 understand, a massage -- perhaps you are not
 20 really familiar with what massage is.
 21 Q. I am, I don't need a lecture on
 22 massage.
 23 A. I think you do.
 24 MR. PAGLIUCA: No question pending.
 25 She will ask you another question now.

1 G Maxwell - Confidential
 2 A. Massage is for health benefits.
 3 Q. When did you first meet Jeffrey?
 4 A. Some point in 1991.
 5 Q. And did Jeffrey know your father?
 6 A. No.
 7 Q. How were you introduced to Jeffrey?
 8 A. Some friend introduced us.
 9 Q. Can you describe your relationship
 10 back in 1991, was it friendship or was it
 11 girlfriend relationship or was it a work
 12 relationship, what was your relationship in
 13 1991?
 14 A. It was just friendly.
 15 Q. Then I believe you testified you
 16 began working for him in 1992, is that
 17 correct?
 18 A. Yes.
 19 Q. In 1992 I know you gave me the
 20 description of the work that you were
 21 performing for him, how much was he paying
 22 you, do you remember?
 23 A. I don't recall.
 24 Q. Do you know for example in 2001 how
 25 much he was paying you?

1 G Maxwell - Confidential
 2 A. I don't recall.
 3 Q. Did it change over the years or did
 4 the payment remain the same?
 5 A. I believe over the course of time
 6 it increased a little bit.
 7 Q. Was that the -- was that payment
 8 the payment that -- was the payment made with
 9 respect to the jobs, the work you were
 10 performing for Jeffrey, was that your sole
 11 income at that time?
 12 MR. PAGLIUCA: I object to the
 13 form. I'm also going to instruct you
 14 not to answer about sources of -- your
 15 personal sources of income outside of
 16 Mr. Epstein at all.
 17 MS. McCAWLEY: What's the basis for
 18 that?
 19 MR. PAGLIUCA: It's confidential,
 20 it's not part of this lawsuit.
 21 MS. McCAWLEY: We have a protective
 22 order and it is part of this lawsuit
 23 with respect to our damage claims.
 24 MR. PAGLIUCA: It's not and, in
 25 fact, you are not entitled to ask

1 G Maxwell - Confidential
 2 financial information of a defendant in
 3 this kind of case, in a defamation case
 4 unless and until there is a finding that
 5 you are entitled to punitive damages.
 6 That is clear in New York case law, both
 7 state and Federal.
 8 MS. McCAWLEY: We disagree on that
 9 point and we will come back to that.
 10 Q. From the source of payment from the
 11 source of Jeffrey, from your work, can you
 12 give me a range on that, do you know was it
 13 over \$100,000?
 14 A. I just testified I don't recall.
 15 Q. You don't don't know if it was
 16 \$500,000?
 17 A. It was less than that.
 18 Q. Somewhere between 100 and 500,
 19 would that be fair to say?
 20 A. I believe it was between 100 and
 21 \$200,000.
 22 Q. Did Jeffrey during the time that
 23 you were working for him purchase a town home
 24 for you?
 25 A. The subject of the townhouse is, I

1 G Maxwell - Confidential
 2 worked for it and I had a loan, we did loans.
 3 Q. So a loan through Jeffrey?
 4 A. I don't recall the exact
 5 transaction.
 6 Q. Did he purchase for you a
 7 helicopter during the time you were working
 8 for him?
 9 A. It was his helicopter.
 10 Q. When did you obtain your pilot
 11 license?
 12 A. I believe it was '98 or '99.
 13 Q. Was that for both airplanes and
 14 helicopters or just helicopters?
 15 A. Just helicopters.
 16 Q. Have you ever flown [REDACTED]
 17 [REDACTED] on your helicopter?
 18 A. That is another one of Virginia's
 19 lies.
 20 Q. The question is have you ever done
 21 that?
 22 A. I have never flown [REDACTED]
 23 [REDACTED] at any time ever, in any helicopter,
 24 in any place, any time, in any state, in any
 25 country, at any time anywhere.

1 G Maxwell - Confidential
 2 Q. Have you ever had dinner with
 3 [REDACTED] at Jeffrey's home, at any
 4 of Jeffrey's homes?
 5 A. No, I don't believe so.
 6 Q. Have you traveled on Jeffrey's
 7 planes with [REDACTED] ?
 8 A. Yes, I have.
 9 Q. Would that have been in 2002?
 10 A. It's very hard for me to recollect
 11 exact dates but that sounds about right.
 12 Q. Was that during the time that
 13 Virginia was working for Jeffrey?
 14 A. I don't know that Virginia ever did
 15 work for Jeffrey. I don't exactly know if
 16 she testified to her so-called duties, we
 17 know she is a serial liar so I can't testify
 18 to what she did or didn't do. So I object to
 19 that characterization of her. So repeat the
 20 question, please.
 21 Q. Can you read the question back?
 22 (Record read.)
 23 Q. You can answer the question.
 24 A. What was the question again?
 25 Q. When you were traveling on the

1 G Maxwell - Confidential
 2 plane with [REDACTED], was that during
 3 the time, it was 2002, that you were on a
 4 flight with [REDACTED] was that during the time
 5 Virginia was working for Jeffrey?
 6 MR. PAGLIUCA: Object to the form.
 7 Misstates the witness' answer and if you
 8 can answer the question, you can answer
 9 it.
 10 A. Well, like I said, I don't recall
 11 exactly when I flew with him. I don't recall
 12 when Virginia, we know what Virginia claims
 13 when she left, so I can't answer the
 14 question. I have no idea.
 15 Q. Do you know [REDACTED]?
 16 A. I do.
 17 Q. How long have you known him?
 18 A. A very long time.
 19 Q. Since you were a child?
 20 A. I really -- it's so long, it's
 21 really a long time ago. I just don't recall.
 22 Q. Do you remember how you first met
 23 him?
 24 A. No, I do not.
 25 Q. Did you introduce him to Jeffrey?

1 G Maxwell - Confidential
 2 A. That would be another of Virginia's
 3 lies and the lies you perpetrate. I never
 4 introduced [REDACTED] to Jeffrey Epstein
 5 at any time ever, so just add that the to
 6 long list of lies.
 7 Q. Did Jeffrey know [REDACTED]?
 8 A. Clearly he knew him. I think we
 9 have that answer but how -- yeah.
 10 Q. Do you know how Jeffrey met [REDACTED]
 11 [REDACTED]?
 12 A. I do not know Jeffrey met [REDACTED]
 13 [REDACTED]. What I do know is that I did not
 14 introduce them. That is one of the many
 15 lies. Are we tallying all the lies?
 16 Q. Do you know when Jeffrey met [REDACTED]
 17 [REDACTED]?
 18 A. I do not know when Jeffrey met
 19 [REDACTED].
 20 Q. Did you ever introduce [REDACTED]
 21 [REDACTED] to any girls under the age of 18 who
 22 were not friends of yours children?
 23 A. I have not introduced [REDACTED]
 24 to anyone that I am aware of other than
 25 friends of mine who have kids under that age

1 G Maxwell - Confidential
 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 [REDACTED]
 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.

1 G Maxwell - Confidential
 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?

1 G Maxwell - Confidential
 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

1 G Maxwell - Confidential
 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], Jeffrey
 13 Epstein and yourself and Virginia Roberts?
 14 A. I would just like to state for the
 15 record [REDACTED]
 16 [REDACTED]
 17 [REDACTED], at
 18 [REDACTED]
 19 [REDACTED]
 20 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]?

1 G Maxwell - Confidential
 2 A. No, I don't.
 3 Q. Where in your town home -- we will
 4 come back to that.
 5 Do you have guest bedrooms in your
 6 town home in London?
 7 A. I do.
 8 Q. How many?
 9 A. Two.
 10 Q. Did [REDACTED] ever visit
 11 Jeffrey and you in New York?
 12 A. Yes.
 13 Q. Do you remember him visiting you
 14 and Jeffrey in New York in the spring of
 15 2001?
 16 A. Again, I can't testify to any
 17 specific dates.
 18 Q. So you don't have a recollection of
 19 that?
 20 A. I have a recollection -- you've
 21 asked me if I have a recollection of being in
 22 New York but if you are asking for a date, I
 23 cannot confirm that date.
 24 Q. Do you remember [REDACTED] being
 25 present in New York for a party where [REDACTED]

1 G Maxwell - Confidential
 2 [REDACTED] was also present?
 3 A. I don't recollect.
 4 Q. Do you recall ever giving [REDACTED]
 5 [REDACTED] a gift of a puppet that was in the
 6 same -- that looked like him?
 7 A. I never gave him a gift of a
 8 puppet.
 9 Q. Did Jeffrey ever give him a gift of
 10 a puppet?
 11 A. No, not that I am aware of.
 12 Q. Have you ever given him any gifts?
 13 MR. PAGLIUCA: Objection,
 14 foundation.
 15 A. I know [REDACTED] --
 16 Q. Have you ever given him any gifts
 17 that you remember when he came to Jeffrey's
 18 home in New York?
 19 A. I don't recall giving him any gifts
 20 in New York.
 21 (Maxwell Exhibit 5, picture, marked
 22 for identification.)
 23 Q. I think I directed you to page
 24 0034.
 25 Is that a picture that was taken at

1 G Maxwell - Confidential
 2 your London town home?
 3 A. I have no idea what this picture
 4 was taken. I know what she purports it to be
 5 but I'm not going to say that I do.
 6 Q. Do the surroundings look like your
 7 London town home?
 8 A. They are familiar.
 9 Q. Do you know who took this picture?
 10 A. I do not.
 11 Q. Did Jeffrey Epstein take the
 12 picture?
 13 A. I just testified I don't know who
 14 took the picture.
 15 Q. So you don't know if Jeffery
 16 Epstein took the picture?
 17 A. When I tell you I don't know who
 18 took the picture, it doesn't mean him -- I
 19 don't know who took the picture. You can
 20 come up with 50 names, I still do not know
 21 who took the picture.
 22 Q. Did you observe [REDACTED] go
 23 into a room with Virginia alone in your town
 24 home?
 25 A. I cannot recall. As I have said,

1 G Maxwell - Confidential
 2 no.
 3 Q. Did [REDACTED] ever tell you
 4 that he had sex with Virginia Roberts?
 5 A. He did not.
 6 Q. Did Jeffrey Epstein ever tell you
 7 that [REDACTED] had sex with Virginia
 8 Roberts?
 9 A. He did not.
 10 Q. Did [REDACTED] ever visit -- let
 11 me back up for a moment. We talked about
 12 Jeffrey's homes, did Jeffrey have a home in
 13 the U.S. Virgin islands called Little St.
 14 James?
 15 A. Yes.
 16 Q. Did [REDACTED] ever visit that
 17 island -- are you aware of [REDACTED] ever
 18 visiting Jeffrey's island?
 19 A. I am aware of that, yes.
 20 Q. Do you know how many times he
 21 visited?
 22 A. I do not.
 23 Q. Do you know if he visited when
 24 Virginia was on the island?
 25 A. I do not.

1 G Maxwell - Confidential
 2 Q. Were you present on the island when
 3 [REDACTED] visited?
 4 A. Yes.
 5 Q. How many times?
 6 A. I can only remember once.
 7 Q. Were there any girls under the age
 8 of 18 on the island during that one visit
 9 that you remember that were not family or
 10 friends of or daughters of your friends?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. There were no girls on the island
 14 at all. No girls, no women, other than the
 15 staff who work at the house. Girls meaning,
 16 I assume you are asking underage, but there
 17 was nobody female outside of the cooks and
 18 the cleaners.
 19 Q. Did you, as part of your duties in
 20 working for Jeffrey, ever arrange for
 21 Virginia to have sex with [REDACTED] 1?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Just for the record, I have never
 25 at any time, at anyplace, in any moment ever

1 G Maxwell - Confidential
 2 asked Virginia Roberts or whatever she is
 3 called now to have sex with anybody.
 4 Q. Did you ever provide Virginia
 5 Roberts with an outfit, an outfit of a sexual
 6 nature to wear for [REDACTED] ?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I think we addressed the outfit
 10 issue.
 11 Q. I am asking you if you ever
 12 provided her with an outfit of a sexual
 13 nature to wear for [REDACTED] ?
 14 A. Categorically no. You did get
 15 that, I said categorically no
 16 Q. Don't worry I'm paying attention.
 17 A. You seemed very distracted in that
 18 moment.
 19 (Maxwell Exhibit 6, flight logs,
 20 marked for identification.)
 21 A. Do you mind if I take a break for
 22 the bathroom.
 23 Q. It's 11:08 and we are going to go
 24 off the record now.
 25 THE VIDEOGRAPHER: It's now 11:09.

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 2 one of his planes?
 3 A. There was a bed on one of his
 4 planes that folded out, yes.
 5 Q. Do you recall whether with respect
 6 to this being in Santa Fe, do you recall
 7 whether you were there for some form of a
 8 party?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. I don't recall the trip at all and
 12 this looks like a total work trip, not a
 13 party trip.
 14 Q. What would be the difference
 15 between a work trip and a party trip?
 16 A. Just that I would be on trips for
 17 work and I believe that this looks like, [REDACTED]
 18 looks like it's one of the -- probably one of
 19 the designers and the time would meet with a
 20 trip to decorate the house, just the timing
 21 of it.
 22 Q. So would Virginia be brought on
 23 trips that were for the purpose of work and
 24 decorating the house?
 25 A. Like I said, I never worked with

1 G Maxwell - Confidential
 2 her but you would have to ask Jeffrey what he
 3 brought her on the trip for.
 4 Q. But she would travel with him when
 5 there was a work trip like this?
 6 A. I can't -- I'm seeing that she is
 7 on this flight but I have no idea what she is
 8 doing, he invited her, it would not be my
 9 job.
 10 Q. What about Nadia Bjorlin, would she
 11 regularly travel with Jeffrey on flights?
 12 A. I have no idea, you would have to
 13 look through the flight logs. I have no
 14 idea.
 15 Q. Your recollection is -- what is
 16 your recollection, do you recollect Nadia
 17 traveling often on flights with Jeffrey?
 18 A. Absolutely not. No, not at all. I
 19 don't recollect her actually on the flight at
 20 all.
 21 Q. I think you can set that aside for
 22 the moment.
 23 (Maxwell Exhibit 9, message pad
 24 pages, marked for identification.)
 25 Q. We will mark as Exhibit 9 these

1 G Maxwell - Confidential
 2 excerpts from -- we will identify what they
 3 are but from the message pads.
 4 Did you want to correct anything?
 5 A. I want to make an addendum.
 6 Would you mind rereading the last
 7 question back to me?
 8 (Record read.)
 9 A. I also just want to say that at
 10 this point I cannot recollect flying to
 11 parties. Jeffrey went for work so -- was
 12 this in Santa Fe, this flight as well.
 13 Q. The flight we were looking at, yes
 14 but it was to Santa Fe --
 15 A. I don't recall going to any parties
 16 in Santa Fe at any time but certainly flying
 17 to Santa Fe for a party seems highly
 18 improbable.
 19 Q. So I'm going to direct your
 20 attention to the document that I set before
 21 you which is Bates number [REDACTED] and it
 22 has different Bates numbers because it's a
 23 smaller version of the larger production.
 24 These are the pages I will be asking about.
 25 In the time that you were working

1 G Maxwell - Confidential
 2 with Jeffrey in Palm Beach, do you recall a
 3 process for taking, anybody at the house
 4 taking messages when incoming phone calls
 5 came in?
 6 A. You are supposed to take a message
 7 and receive the message and write the message
 8 down. Who was the message was for, what time
 9 it was taken and who took it and what the
 10 message was, obviously.
 11 Q. Does what's in front of you look
 12 familiar with respect to the message pads
 13 that you would have used at the house?
 14 A. It is familiar.
 15 Q. I'm going to direct your attention
 16 to the second page of it?
 17 MR. PAGLIUCA: These all have SAO
 18 numbers on them or Bates ranges and I
 19 don't see any of your Bates ranges on
 20 these. I know you have produced message
 21 pads but those have your Bates range
 22 numbers on them and I'm wondering if
 23 these are different documents.
 24 MS. McCRAWLEY: It's the same, just
 25 ours have the Bates underneath them.

1 G Maxwell - Confidential
2 These were produced as part of the rule
3 26 discovery. We can get the additional
4 Bates if you want.

5 Q. The one I'm asking about first is
6 the [REDACTED]. You can look at that and then
7 I will identify the Bates number referenced
8 in this case.

9 I want to direct your attention to
10 the top right-hand corner just so I have an
11 understanding of how these messages were
12 taken. So I see that it says at the top it
13 says in the for line it says Ms. Maxwell and
14 the date of [REDACTED] and then I see under the
15 M line it looks like [REDACTED] or
16 something like that, a phone number and a
17 message saying returning your call and on the
18 bottom it looks like [REDACTED].

19 Explain to me, is this -- does this
20 represent [REDACTED], taking down a message for you
21 from [REDACTED], is that how these work?

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

24 Q. My question is, I'm trying to
25 understand how the messages were taken.

1 G Maxwell - Confidential
2 for JE, date [REDACTED], message [REDACTED]
3 and then it's signed GM.

4 Is that your signature?

5 A. That's not my handwriting.

6 Q. Would other people take a message,
7 how did this process work, is there someone
8 else in the house with the initials GM?

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

11 A. I cannot answer that. It's not my
12 handwriting.

13 Q. I'm trying to understand how this
14 gets there. If you took a message and didn't
15 write it down, would someone else record that
16 message for you?

17 MR. PAGLIUCA: Objection to the
18 form and foundation.

19 A. All I can tell you, this is not my
20 handwriting so I cannot -- I have no idea
21 what that is.

22 Q. Was the practice that, what was the
23 practice when someone answered the phone with
24 these message pads, what were they supposed
25 to do?

1 G Maxwell - Confidential
2 Looking at this message pad, where it says
3 signed [REDACTED], can you tell me who [REDACTED] was?

4 A. I cannot.

5 Q. You do not know.

6 Typically when these messages were
7 taken in your practice when you were there,
8 would the individual who took the message
9 write their name on the message?

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

12 A. I don't recollect, you can ask who
13 wrote it so you can find out who it was.

14 Q. Do you know who [REDACTED] is?

15 A. I don't.

16 Q. I'm going to direct your
17 attention -- do we have a Bates number for
18 that?

19 MR. EDWARDS: [REDACTED].

20 Q. Giuffre [REDACTED] for that one.

21 I will direct your attention to the
22 first page which has the [REDACTED] on it.

23 A. Okay.

24 Q. Now at the top of that document, on
25 the right-hand side, the message that reads

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2 A. They were supposed to take a
3 message and the time and date and give the
4 message.

5 Q. Were they supposed to indicate who
6 took the message?

7 A. They were but it wasn't -- I don't
8 really recall the actual process. I can see
9 from here it looks like you were supposed to
10 but that's not my handwriting so I can't say
11 what that was.

12 Q. Do you know who [REDACTED] is?

13 A. No, I don't.

14 Q. Do you know whether [REDACTED]
15 was under the age of 18?

16 A. I just testified I couldn't
17 remember who she was so it would be difficult
18 to know how old she was.

19 Q. Do you know if she was coming to
20 the house to provide massages?

21 A. I don't remember who she is at all,
22 so no.

23 Q. And then I would like to direct
24 your attention to the message right
25 underneath it. Which says JE. [REDACTED]

1 G Maxwell - Confidential
 2 and has a phone number and the message says,
 3 wants to know if she should bring her friend
 4 [REDACTED] tonight.
 5 What is that message referring to?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. I can't possibly know.
 9 Q. Did individuals at the house take
 10 messages for underage girls to come over and
 11 bring friends for the purpose of providing
 12 massages?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation.
 15 A. How would I possibly know what you
 16 are talking about.
 17 Q. Did you record messages at the
 18 house?
 19 A. It's not my job.
 20 Q. You did from time to time record
 21 messages?
 22 A. Hardly ever.
 23 Q. But you did from time to time do
 24 it?
 25 A. I'm just saying I hardly ever took

1 G Maxwell - Confidential
 2 messages, very, very, very, very
 3 infrequently.
 4 Q. Do you know if [REDACTED] brought her
 5 friend [REDACTED] over on that night?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. One, I don't know what this message
 9 is, I don't know if I was in Palm Beach, I
 10 don't know who [REDACTED] is, I don't know who
 11 [REDACTED] is and I don't know what this message
 12 is referring to.
 13 Q. So on January 2nd of 2003, were you
 14 in Palm Beach?
 15 A. I don't know.
 16 Q. Where would you have been other
 17 than Palm Beach at the time?
 18 A. I could have been anywhere.
 19 Q. Where did you typically live?
 20 A. What are you asking me?
 21 Q. So for example, in 2003, where was
 22 your primary residence, was it wherever
 23 Jeffrey was living and staying or was it
 24 independent of that?
 25 A. What was the date again.

1 G Maxwell - Confidential
 2 Q. In 2003?
 3 A. The end of 2003?
 4 Q. January, the beginning.
 5 A. I don't know, I could have been
 6 anywhere, Jeffrey and I were leading almost
 7 separate lives by then.
 8 Q. If you were at the house that day,
 9 did you recall seeing anybody by the name of
 10 [REDACTED]
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I don't know if I was at the house,
 14 so I can't testify to that.
 15 Q. Let's flip back to the next page,
 16 the one we were on before the [REDACTED], the
 17 message towards the bottom that says, for
 18 Jeffrey, message of Ghislaine. And it says,
 19 Would it be helpful to have and then redacted
 20 come to Palm Beach today to stay here and
 21 help train new staff with Ghislaine. Who
 22 were you referring to in that message; do you
 23 remember?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

1 G Maxwell - Confidential
 2 Q. The question is, do you recall this
 3 message?
 4 A. I do not recall this message.
 5 Q. Do you recall training a female
 6 under the age of 18 at Jeffrey's home?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I never trained a female under the
 10 age of 18 at Jeffrey's home.
 11 Q. Did you ever say it would be
 12 helpful to have a female under the age of 18
 13 come to Palm Beach today to stay here and
 14 help train new staff with Ghislaine?
 15 A. I never asked anyone under the age
 16 of 18 come to help train new staff.
 17 Q. I'm going to flip to the next page
 18 which is [REDACTED].
 19 A. By the way, that is not my
 20 handwriting and it's not dated and I couldn't
 21 possibly tell you who that is.
 22 Did you hear that?
 23 Q. You got your testimony on the
 24 record.
 25 [REDACTED].

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 2 A. Yes.
 3 MR. EDWARDS: Giuffre [REDACTED].
 4 Q. I'm going to direct your attention
 5 to the top right-hand corner, for Mr.
 6 Epstein, [REDACTED], message [REDACTED], a phone
 7 number and called.
 8 Do you know who [REDACTED] is?
 9 A. I don't.
 10 Q. Do you know that [REDACTED] was 15 at
 11 the time she left this message?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I don't know who [REDACTED] is.
 15 Q. And then I'm going to direct your
 16 attention to the bottom left which is a
 17 message JE message of [REDACTED] and the
 18 message says, He just did a good one, 18
 19 years, she spoke to me and said I love
 20 Jeffrey.
 21 Was [REDACTED] referring to sex with
 22 an 18 year old in that message?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. How could I know what [REDACTED] is

1 G Maxwell - Confidential
 2 referring to.
 3 Q. Do you know if [REDACTED] had sex
 4 with an 18 year old that he referenced to
 5 Jeffrey Epstein?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. How could I possibly know.
 9 Q. Did Jeffrey Epstein or [REDACTED]
 10 ever tell you that [REDACTED] had sex with an
 11 18 year old?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I have no idea what you are talking
 15 about.
 16 Q. Did they ever tell you that?
 17 A. I have no recollection of ever
 18 hearing such a ridiculous thing.
 19 Q. I will turn to the next page which
 20 is SAO 2841?
 21 MS. MENNINGER: Do you have the
 22 Bates number?
 23 Q. The bottom right-hand corner, Mr.
 24 Epstein, the date [REDACTED], Ms. Maxwell, it
 25 says, [REDACTED], it says, quote, [REDACTED] is

1 G Maxwell - Confidential
 2 available on Tuesday, no one for tomorrow.
 3 Is this a message you took?
 4 A. It's not my handwriting and I don't
 5 know who R is.
 6 Q. So when it says Ms. Maxwell in the
 7 line there, is that you calling for Mr.
 8 Epstein?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. I didn't write it, I don't know
 12 when this message was taken. I don't even
 13 know what it's referring to and I don't know
 14 what my name is doing on that message pad.
 15 Q. I know you said you only took them
 16 a few times. Do you have a recollection of
 17 taking messages of females who would call the
 18 house to indicate whether or not they were
 19 coming over?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. Give me a date range.
 23 Q. On 7/9/04.
 24 A. How would I know if I'm in Palm
 25 Beach, most likely not.

1 G Maxwell - Confidential
 2 Q. I'm asking if you have a
 3 recollection of taking messages for girls who
 4 would call the house --
 5 A. Girls.
 6 Q. Females, who would call the
 7 house --
 8 A. Over the age of 18.
 9 Q. [REDACTED] is 15.
 10 A. I don't know who [REDACTED] is, so I
 11 can't testify anything to [REDACTED].
 12 Q. Your name is on the message.
 13 A. I didn't put it there and I don't
 14 know what it's doing there.
 15 Q. So your testimony is you didn't
 16 take this message?
 17 A. I obviously didn't take the
 18 message, it's signed by somebody R, it's not
 19 my handwriting. We don't know if I'm in Palm
 20 Beach.
 21 Q. Did you arrange for [REDACTED] to have
 22 his friend [REDACTED] come over on Tuesday of
 23 this week?
 24 A. I don't know who [REDACTED] is so it
 25 would be hard for me to arrange anything with

1 G Maxwell - Confidential
 2 someone I don't know.
 3 Q. Why is your name reflected on this
 4 message pad?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. I have no idea. You would have to
 8 ask whoever took the message.
 9 Q. Did you, in the course of your
 10 work, regularly take messages for Jeffrey
 11 Epstein?
 12 A. I already testified I hardly ever
 13 did.
 14 Q. Would you, in the course of your
 15 work, regularly set up appointments for
 16 females to come over and give massages for
 17 Jeffrey Epstein?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. Can you specify, females, you mean
 21 adults over the age of 18.
 22 Q. Did you regularly set up for
 23 Jeffery adults over the age of 18 to come for
 24 massages?
 25 A. I didn't regularly do that, no.

1 G Maxwell - Confidential
 2 Q. Would you take messages with
 3 respect to females over the age of 18 to come
 4 over for a massage?
 5 A. I already testified I hardly ever
 6 did take messages.
 7 Q. But would you?
 8 A. I already testified, I hardly
 9 ever --
 10 Q. I know hardly ever, but did you?
 11 A. Over the course of time it is
 12 possible I may have taken a couple, I have no
 13 recollection. I hardly ever did and I did so
 14 irregularly that it would hard for me to
 15 pinpoint.
 16 Q. Did you ever take a message for a
 17 female under the age of 18 to come over for a
 18 massage or for any other reason to be with
 19 Jeffrey Epstein?
 20 MR. PAGLIUCA: Object to the form
 21 and foundation.
 22 A. I hardly ever took a message. I
 23 have absolutely no way of knowing, maybe one
 24 of my friends' daughters called to say they
 25 were coming to visit me. I have never taken

1 G Maxwell - Confidential
 2 messages, I don't know about how I would
 3 possibly know if somebody I spoke to, one or
 4 two times I took a message is, how old they
 5 would be but I have never taken a message
 6 where I was aware of anything being under the
 7 age of 18 and I probably took it so
 8 infrequently, it would be impossible.
 9 Q. Can you turn to [REDACTED] it
 10 should be the next page.
 11 A. Uh-huh.
 12 Q. Do you see at the top, it says, for
 13 Mr. J. 11/8/04 and then the name is
 14 redacted. It says, I have a female for him.
 15 Why would a minor be calling
 16 Jeffrey to say they have a female for him?
 17 Do you know?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. First of all, I don't know that's a
 21 minor, I don't know who took the message.
 22 Q. I will represent to you these are
 23 police reports and minor's names have to be
 24 redacted for privacy purposes?
 25 MR. PAGLIUCA: Objection to the

1 G Maxwell - Confidential
 2 form and foundation.
 3 Q. Do you know why a minor child would
 4 be calling Jeffrey and leaving a message to
 5 say, quote, I have a female for him?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. I can't testify anything about this
 9 message, I don't know anything about it.
 10 Q. I'm going to direct your attention
 11 to the next page [REDACTED]. If you look at
 12 the bottom left, you are going to see a
 13 message for Jeffrey, from [REDACTED], it
 14 says she doesn't have a number and left a
 15 message that she called.
 16 Do you know who [REDACTED] is?
 17 A. I do not.
 18 Q. Do you know that [REDACTED] was
 19 13 at the time she placed this call to
 20 Jeffrey?
 21 A. I don't know who [REDACTED] is.
 22 Q. Would Jeffrey regularly have 13
 23 year olds call and leave messages?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

1 G Maxwell - Confidential
 2 A. How would I possibly, these were
 3 messages taken when I was not at the house
 4 and I have no idea who they are nor how old
 5 they are nor anything.
 6 Q. How do you know you weren't at the
 7 house on this day?
 8 A. I was hardly at the house in 2005.
 9 Q. So you could have been there, you
 10 just don't know?
 11 A. In the five days I might have been
 12 there in 2005, I suppose it's possible but
 13 it's unlikely.
 14 MR. PAGLIUCA: Do you know why this
 15 isn't redacted if you are representing
 16 all the names of people who are underage
 17 have been redacted from these records.
 18 MS. McCAWLEY: I think it was -- my
 19 assumption is it was a miss by the
 20 police department.
 21 Q. I will direct your attention to [REDACTED]
 22 [REDACTED] so you will skip a page and go back,
 23 it's the final page in the message pads and
 24 you will see on the top left for Jeffrey, on
 25 6/1/2005 from [REDACTED] with a phone

1 G Maxwell - Confidential
 2 number. It says, quote, He has a teacher for
 3 you to teach you how to speak Russian. She
 4 is two times eight years old. Not blond.
 5 Lessons are free and you can have your first
 6 today if you call.
 7 Do you know whether [REDACTED]
 8 sent a Russian girl that was 16 years old
 9 over to Jeffrey Epstein's home?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I do not know.
 13 Q. Did you ever observe a Russian girl
 14 that was 16 years old come to Jeffrey
 15 Epstein's home?
 16 A. I am not aware of any 16 year old
 17 Russian girl that I can recall in Jeffrey
 18 Epstein's home.
 19 Q. Do you know whether Jeffrey Epstein
 20 had sex with a 16 year old Russian girl?
 21 MR. PAGLIUCA: Objection to the
 22 form and foundation.
 23 A. I do not know.
 24 THE VIDEOGRAPHER: It's 12:25.
 25 This will be the end of disk 3, we are

1 G Maxwell - Confidential
 2 off the record.
 3 (Recess.)
 4 AFTERNOON SESSION
 5 (Time noted: 1:21 p.m.)
 6 GHISLAINE MAXWELL,
 7 resumed and testified as follows:
 8 EXAMINATION BY (Cont'd.)
 9 MS. McCAWLEY:
 10 THE VIDEOGRAPHER: It's now 1:21,
 11 we're starting disk No. 4. We are back
 12 on the record.
 13 Q. Ms. Maxwell, before the break, we
 14 were talking about and I think it's one of
 15 the exhibits that's marked in front of you,
 16 I'm not sure of the number, but the police
 17 report that I showed you earlier today.
 18 Now that you have knowledge of the
 19 police report and the criminal investigation
 20 with respect to Jeffrey Epstein, do you
 21 believe that Jeffrey Epstein abused any minor
 22 children?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. Can you repeat the question please

1 G Maxwell - Confidential
 2 and break it down so it's more
 3 understandable.
 4 Q. Now that you have the police report
 5 that I showed you this morning that you had
 6 an opportunity to look at.
 7 A. You gave it to me, I did not look
 8 at it.
 9 Q. The questions that I asked you
 10 about the police report -- you are aware
 11 there is a police report?
 12 A. I am aware there is a police
 13 report.
 14 Q. You are aware there was a criminal
 15 investigation of Jeffrey Epstein?
 16 A. I am aware that there was that.
 17 Q. Now that you are aware of those two
 18 things and having talked to Jeffrey Epstein,
 19 do you believe Jeffrey Epstein sexually
 20 abused minors?
 21 MR. PAGLIUCA: Objection to the
 22 form and foundation.
 23 A. Can you reask the second part of
 24 that question please.
 25 Q. Sure. The two documents we were

1 G Maxwell - Confidential
 2 please?
 3 Q. Is it an obvious lie that you had
 4 sex toys in Jeffrey Epstein's Palm Beach
 5 house?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. Did Virginia say that?
 9 Q. I'm asking you a question.
 10 Is it an obvious lie that you had
 11 sex toys in Jeffrey Epstein's house?
 12 A. I don't recall any sex toys.
 13 Q. If someone said had you sex toys,
 14 would that be an obvious lie?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. Like I said -- can you be more
 18 specific about the house or whatever, what
 19 exactly you are referring to, what's a sex
 20 toy?
 21 Q. Yes. How would you define a sex
 22 toy?
 23 A. No. I need you to define a sex
 24 toy, I don't have enough knowledge of sex
 25 toys.

1 G Maxwell - Confidential
 2 Q. I will define it based on the
 3 dictionary's definition, which is an object
 4 or device used to sexually stimulate or
 5 enhance sexual pleasure.
 6 A. What's your question, please?
 7 Q. The question is, is it an obvious
 8 lie that you had sex toys in Jeffrey
 9 Epstein's Palm Beach house?
 10 MR. PAGLIUCA: Same objection.
 11 Q. You can answer.
 12 A. Like I said, I do not have any
 13 recollection of sex toys in Jeffrey's house.
 14 Q. Is it a lie, is it an obvious lie
 15 that you took pictures of nude girls?
 16 MR. PAGLIUCA: Object to the form
 17 and foundation.
 18 A. We already covered this. Girls we
 19 are not referring to -- I can only testify to
 20 taking pictures of adult people and I already
 21 testified they are not nude, per se. That
 22 every picture that I ever took and which they
 23 were very limited, always by request, the
 24 people would be covered or it would be a hand
 25 or a foot. There was never any pictures that

1 G Maxwell - Confidential
 2 I took of people would only have been
 3 mainstream type magazine type photos and any
 4 photos I took could have been very happily
 5 and expected to be displayed on your parents'
 6 mantel piece or grandparents' mantel piece.
 7 Q. Is it a lie that you approached
 8 females to bring them to Jeffrey Epstein?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. Please ask the question, again.
 12 Q. Sure. Is it a lie that you
 13 approached females to bring them to Jeffrey
 14 Epstein?
 15 A. I don't know what you are asking
 16 me.
 17 Q. I'm asking you, if it's a lie that
 18 you approached females to bring them to
 19 Jeffrey Epstein?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. You are not asking me a good
 23 question, sorry.
 24 Q. You don't get to choose the
 25 questions.

1 G Maxwell - Confidential
 2 A. I would like to answer your
 3 questions but you are not asking me a
 4 question that I can answer.
 5 Q. What about that is causing you
 6 pause where you can't answer the question?
 7 A. You are trying to trap me and
 8 that's not fair, so I already testified that
 9 I hire people across the board, so I would
 10 hire architects, decorators, pool people,
 11 exercise instructors, gardeners, cooks,
 12 chefs, cleaning people. So I, in the course
 13 of a very long time when I would hire people
 14 I hired people to work for Jeffrey. So I'm
 15 happy to testify to hiring people for every
 16 possible conceivable proper job that you
 17 could conceive of within the context of
 18 Jeffrey's life and homes.
 19 Q. Is it a lie that you approached
 20 females to bring them to Jeffrey Epstein for
 21 the purpose of performing massages?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Again, I have already testified
 25 that part of the job that I had was to hire

1 G Maxwell - Confidential
 2 agree to that?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 Q. Are they under the age of 18?
 6 A. We already established that you can
 7 be a masseuse in Florida at age 17. That
 8 does not make it inappropriate.
 9 A. I'm not saying appropriate or
 10 inappropriate. I'm just asking if there were
 11 any exercise instructors that were under the
 12 age of 18.
 13 A. I am not aware if anybody was but I
 14 don't want to full out and say you oh she
 15 said, we already established you can be a 17
 16 year old masseuse and have it not be
 17 something that is not appropriate. So when
 18 you say that and then you go, well, you come
 19 back and say something, now we can establish
 20 that Virginia was 17 but you can be a 17 year
 21 old legal masseuse, but I am not aware to
 22 your point.
 23 Q. Who were the other 17 year old
 24 masseuses that you were aware of?
 25 A. I am not aware of any.

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 2 Q. Were there any 16 year year old
 3 masseuse that you are aware of?
 4 A. I am not aware.
 5 Q. Any 15?
 6 A. I just want to be clear. The only
 7 person that I am aware of who claims to have
 8 been a -- we have to -- we established
 9 Virginia now is 17, given she has changed her
 10 age so many times. The only person that I am
 11 aware of that was a masseuse at the time when
 12 I was present in the house was Virginia.
 13 Q. Is it an obvious lie that Jeffrey
 14 Epstein had a sexual preference for underage
 15 miners?
 16 MR. PAGLIUCA: Objection to the
 17 form and foundation.
 18 A. Can you ask the question again?
 19 Q. It is it an obvious lie that
 20 Jeffrey Epstein had a sexual preference for
 21 underage minors?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Can you ask the question again?
 25 Q. Is it an obvious lie that Jeffrey

1 G Maxwell - Confidential
 2 Epstein had a sexual preference for underage
 3 minors?
 4 MR. PAGLIUCA: Object to the form
 5 and foundation.
 6 A. I cannot testify to what
 7 Jeffrey's --
 8 Q. You don't know his preference?
 9 A. You handed me a stack of papers
 10 from the police reports and that's what I've
 11 read but I have no knowledge, direct
 12 knowledge, of what you are referencing.
 13 Q. So you don't know, you don't know
 14 in your own mind that Jeffrey Epstein had a
 15 sexual preference for underage minors, is
 16 that correct?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 Q. Is that correct?
 20 A. Please ask the question again.
 21 Q. You don't know in your own mind
 22 that Jeffrey Epstein had a sexual preference
 23 for underage minors?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation. You have to pause,

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 2 let me object, answer the question.
 3 Listen to her question, pause, I object,
 4 you answer.
 5 Q. So you don't know in your own mind
 6 that Jeffrey Epstein had a sexual preference
 7 for underage minors?
 8 MR. PAGLIUCA: Objection to the
 9 form and foundation.
 10 Q. You can answer.
 11 A. I cannot tell you what Jeffrey's
 12 story is. I'm not able to.
 13 Q. Did Jeffrey Epstein have a scheme
 14 to recruit underage girls to use them for
 15 purposes of sexual massages?
 16 MR. PAGLIUCA: Objection to the
 17 form and foundation.
 18 A. Can you ask me again, please?
 19 Q. Did Jeffrey Epstein have a scheme
 20 to recruit underage girls to recruit them for
 21 sexual massages?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Can you ask it a different way?
 25 Q. Did Jeffrey Epstein have a scheme

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 2 to recruit underage girls for sexual
 3 massages?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 Q. If you know.
 7 A. I don't know what you are talking
 8 about.
 9 Q. Is it an obvious lie that Virginia
 10 Giuffre was a minor the first time she was
 11 taken to Jeffrey Epstein's house?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. So we've already established that
 15 Virginia was 17 and we have established that
 16 her mother brought her to the house and that
 17 she came as a masseuse, age 17, which is
 18 legal in Florida.
 19 Q. Would Jeffrey Epstein's assistants
 20 arrange times for underage girls to come to
 21 the house for sexual massages?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. What are you talking about?
 25 Q. Sure. Would Jeffrey Epstein's

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 2 assistants, I think earlier you mentioned, we
 3 talked about [REDACTED] who worked in the
 4 role as an assistant or [REDACTED].
 5 Would Jeffrey Epstein's assistants arrange
 6 times for underage girls to come over the
 7 house for sexual massages?
 8 MR. PAGLIUCA: Objection to the
 9 form and foundation.
 10 A. Again, I read the police reports so
 11 this is all happening according to the police
 12 reports when I am no longer at the house so I
 13 can't testify to what Jeffrey's assistants
 14 did when this kind of activity as alleged in
 15 the reports.
 16 Q. So you don't know?
 17 A. No.
 18 Q. Would Jeffrey Epstein's assistants,
 19 meaning [REDACTED] or any
 20 other assistant that you are aware of from
 21 the time you worked there take nude
 22 photographs of underage girls?
 23 MR. PAGLIUCA: Object to the form
 24 and foundation.
 25 A. During what period of time?

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 2 Q. During any period of time you
 3 worked, did you observe that?
 4 A. I did not observe any such
 5 photographs.
 6 Q. Are you aware if they took those
 7 kinds of photos?
 8 A. I am not aware.
 9 MR. PAGLIUCA: Can we take a
 10 five-minute break.
 11 THE VIDEOGRAPHER: It's 2:58 and we
 12 are off the record.
 13 (Recess.)
 14 THE VIDEOGRAPHER: It's now 3:10.
 15 We're starting disk No. 6 and we are
 16 back on the record.
 17 Q. Ms. Maxwell, was it an obvious lie
 18 when Virginia said she was sent to Thailand
 19 by Epstein in September of 2002?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I have no knowledge of Virginia
 23 being sent to Thailand.
 24 But may I say something?
 25 Q. There is not a question pending

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 2 unless you want to clarify something.
 3 Did you want to clarify that?
 4 A. No, I just wanted to say something.
 5 Q. Is it an obvious lie when Virginia
 6 said she was given instructions to maintain
 7 telephone contact with you while she was in
 8 Thailand?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. Can you repeat the question?
 12 Q. Is it an obvious lie when Virginia
 13 said she was given instructions to maintain
 14 telephone contact with you when she was in
 15 Thailand?
 16 MR. PAGLIUCA: Same objection.
 17 A. I have no idea what instructions
 18 Virginia was given, if any, when she went to
 19 Thailand.
 20 Q. So you know she went to Thailand?
 21 A. I know she claimed she went to
 22 Thailand from having read it but given that
 23 she lied about everything it's hard to know
 24 what is true and not true.
 25 Q. Would it make any sense for her to

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 2 can see the dates.
 3 MR. PAGLIUCA: Can you identify a
 4 Bates number, please.
 5 Q. [REDACTED], which was at the top says,
 6 [REDACTED]. I'm going to refer you,
 7 at the same time, to the flight logs which
 8 were marked, the thicker document that looks
 9 like this with all the log entries on it.
 10 I'm going to refer you to page --
 11 MR. PAGLIUCA: That's Exhibit No.
 12 6, correct? I'm trying to keep the
 13 record straight.
 14 MS. McCAWLEY: I don't have Exhibit
 15 numbers on mine. That's Giuffre [REDACTED].
 16 MR. PAGLIUCA: Hang on one second.
 17 A. Can you repeat the number please.
 18 Q. [REDACTED]. And if you will look on
 19 that page at the entry, under [REDACTED]
 20 [REDACTED] starting with the [REDACTED] and then it runs
 21 down to the, looks like the [REDACTED], that first
 22 entry has [REDACTED]
 23 [REDACTED], Jeffrey Epstein and the
 24 initials GM.
 25 Do you remember taking a trip with

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 2 [REDACTED] during [REDACTED]?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. Can you repeat the question,
 6 please?
 7 Q. Do you remember taking a trip with
 8 [REDACTED] during [REDACTED],
 9 that's the [REDACTED] it looks like, through the
 10 [REDACTED]?
 11 A. I don't remember the dates. I
 12 couldn't testify to when we actually did it
 13 but I do remember the trip itself.
 14 Q. So you were traveling with Jeffrey
 15 Epstein and [REDACTED] at the same
 16 time Virginia was headed to Thailand, is that
 17 correct?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I don't know, is that right?
 21 Q. If you look at [REDACTED] on the
 22 document that I gave you, the first document
 23 and then you referred to, if you look in the
 24 same as above lines, you will see the travel
 25 group with [REDACTED]?

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 2 MR. PAGLIUCA: Are you asking her
 3 to compare the documents or are you
 4 asking her what her personal knowledge
 5 is.
 6 MS. McCAWLEY: I'm asking if she can
 7 look at the doubts and tell me if she
 8 recalls that she traveling with
 9 [REDACTED] at the same time this
 10 document reflects Virginia was in
 11 Thailand.
 12 A. I can't testify to any dates. I
 13 couldn't tell you. I can see a date and I
 14 can see a date but I can't tell you that I
 15 have a memory of the dates. I have a memory
 16 of the trip, I don't have a memory of the
 17 time.
 18 Q. Who is [REDACTED]?
 19 A. [REDACTED].
 20 Q. What is her address?
 21 A. I don't know.
 22 Q. Does she live in the United States?
 23 A. She does.
 24 Q. In what state?
 25 A. I believe in New Jersey somewhere.

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 2 Q. Do you have her phone number?
 3 A. Not memorized.
 4 Q. Do you have the ability to get her
 5 phone number?
 6 A. Of course.
 7 Q. Has she ever asked -- has [REDACTED]
 8 [REDACTED] ever asked other girls to come over to
 9 see Jeffrey Epstein for the purpose of a
 10 sexual massage?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. Can you ask the question again
 14 please.
 15 Q. Has [REDACTED] ever asked girls to
 16 come over to see Jeffrey Epstein for the
 17 purpose of a sexual massage?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 A. Can you ask again, please?
 21 Q. Has [REDACTED] ever asked girls to
 22 come over to see Jeffrey Epstein for the
 23 purpose of sexual massage?
 24 A. I have no personal knowledge.
 25 Q. What does [REDACTED] do for you?

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 2 moment there is such a document, just
 3 hypothetically, and assuming for the
 4 moment that it is going to get produced
 5 somewhere, if it hasn't already been
 6 produced, obviously that would involve a
 7 waiver, a future waiver of the
 8 privilege. I think that's the answer to
 9 the question.
 10 Q. Has the document been produced, do
 11 you know?
 12 A. You have everything that I have
 13 given you, so if you can't -- if it's not in
 14 those documents, I don't know what to tell
 15 you.
 16 Q. Your lawyers haven't withheld any
 17 documents?
 18 A. They are right here. You can ask
 19 them.
 20 Q. I'm asking you.
 21 A. I don't know what -- they're
 22 lawyers.
 23 Q. When we were talking earlier about
 24 [REDACTED], I asked you whether you had
 25 ever given him a gift of a puppet.

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 2 Did you ever, not as a gift, did
 3 you ever see in the presence of [REDACTED]
 4 a puppet?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. Can you be more direct, please?
 8 Q. Sure. Were you ever in a room with
 9 [REDACTED] where there was a puppet?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. Can you be more specific please and
 13 can you bound it by time and be more
 14 specific, whatever you are actually asking
 15 me?
 16 Q. Were you ever in a room with [REDACTED]
 17 [REDACTED] in New York in Jeffrey Epstein's home
 18 where there was a puppet?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. What sort of puppet are you asking
 22 me?
 23 Q. Any kind of puppet?
 24 A. You need to be more descriptive. I
 25 don't know what you mean by puppet, there is

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 2 hand puppets, all sorts of puppets.
 3 Q. Is there any puppet you've ever
 4 seen in Jeffrey Epstein's home in the
 5 presence of [REDACTED] ?
 6 A. Again, puppet, you know, there is
 7 lots of types of puppets.
 8 Q. Any type of puppet.
 9 A. If you want to give me a
 10 description of the puppet, I would be perhaps
 11 be able to say.
 12 Q. Any type of puppet?
 13 A. Can you be more detailed?
 14 Q. Have you ever seen a puppet in
 15 Jeffrey Epstein's home in the presence of
 16 [REDACTED] ?
 17 A. My understanding of a puppet is a
 18 small handheld item you have in a circus. I
 19 have never seen that.
 20 Q. Have you ever seen a puppet which
 21 is defined as a movable model of a person or
 22 animal that is used in entertainment and
 23 typically moved either by strings or
 24 controlled from above or by a hand inside it?
 25 MR. PAGLIUCA: Objection to the

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 2 form and foundation.
 3 A. I have not seen a puppet that fits
 4 exactly that description.
 5 Q. Have you seen any puppet that fits
 6 any description?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. Can you reask the question, please?
 10 Q. Yes.
 11 Have you seen any puppet that fits
 12 any description in the presence of [REDACTED]
 13 [REDACTED] in Jeffrey Epstein's home?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation.
 16 A. I am not aware of any small
 17 handheld puppet that was there. There was a
 18 puppet -- not a puppet -- there was a -- I
 19 don't know how would you describe it really,
 20 I don't know how would you describe it. Not
 21 a puppet, I don't know how you would describe
 22 it. A caricature of [REDACTED] that was
 23 in Jeffrey's home.
 24 Q. Did you use that caricature to put
 25 the hand of the caricature on [REDACTED]

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 2 [REDACTED] breast?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. I don't recollect. I recollect the
 6 puppet but I don't recollect anything around
 7 the puppet. You characterized puppet, I
 8 characterize it as, I don't know, as a
 9 characterization of [REDACTED].
 10 Q. Do you recollect asking Virginia
 11 Roberts to sit on [REDACTED] lap with
 12 the caricature of [REDACTED]?
 13 A. I do not recollect that.
 14 Q. What do you remember about the
 15 caricature of the [REDACTED] caricature
 16 when you were in the presence of [REDACTED]
 17 [REDACTED], Virginia Roberts and [REDACTED]?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I don't recollect the story as told
 21 by [REDACTED] or Virginia. I don't even know
 22 who -- I remember the caricature of [REDACTED]
 23 [REDACTED] and I remember [REDACTED] but I
 24 don't recall anything else around the
 25 caricature.

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 2 recollect this caricature, you recollect
 3 [REDACTED] being there. Do you recollect
 4 a party going on at the time of that
 5 interaction with [REDACTED] and the
 6 caricature?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I don't recollect a party -- first
 10 of all, they weren't really parties -- I
 11 don't recollect a party -- I don't know what
 12 you mean by party in the context of that
 13 scenario.
 14 Q. Who do you recollect being at the
 15 home during the time [REDACTED] was there
 16 with this caricature?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. I only recollect myself with [REDACTED]
 20 [REDACTED], I don't recollect anybody else.
 21 Q. You don't recollect Jeffrey Epstein
 22 being there?
 23 A. Actually, no.
 24 Q. You don't recollect [REDACTED]
 25 being there?

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 2 Q. Did you give it to him?
 3 A. I did not.
 4 Q. Who gave it to him?
 5 A. I don't think it was given to him
 6 at all.
 7 Q. Did he bring it?
 8 A. No.
 9 Q. Was it something that was at the
 10 house?
 11 A. As best I recollect.
 12 Q. Was it something that you saw at
 13 the house in advance of [REDACTED]
 14 arrival?
 15 A. Again, I don't real -- I recollect
 16 the caricature, I recollect [REDACTED], I
 17 don't recollect much else around the
 18 caricature.
 19 Q. Was there a party going on in the
 20 house at the time you recollect the
 21 caricature?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. You have to be way more specific?
 25 Q. Do you remember, you said you

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 2 A. No.
 3 Q. You don't recollect Virginia
 4 Roberts being there?
 5 A. No.
 6 Q. It was just you and [REDACTED]?
 7 A. I am not saying it was just me and
 8 [REDACTED], you are asking me do you
 9 remember. I only remember [REDACTED], I
 10 remember [REDACTED] and the caricature but
 11 I can't place the caricature and everybody
 12 else in the same context, the same timeframe
 13 you are asking me.
 14 Q. [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

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 2 he and Virginia Roberts were together in the
 3 presence of [REDACTED]
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 A. I can't speak to what Jeffrey would
 7 say.
 8 Q. Has he talked to about Virginia
 9 Roberts' statement that she was in the
 10 presence of [REDACTED]?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I have not discussed individual
 14 presences with Virginia. That's not -- I'm
 15 only concerned with what I know to be the
 16 stuff about me. So my focus has always been
 17 the lies and the obvious lies as something I
 18 can personally attest to. I cannot possibly
 19 talk for anything else.
 20 Q. Has Jeffrey Epstein said to you
 21 anything along the lines of Virginia is lying
 22 when she says she met [REDACTED]?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. Again, I'm not talking about what

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 2 she says as regards to other people. I can
 3 talk to things as regards to me.
 4 Q. I'm asking if Jeffrey ever said
 5 that to you?
 6 A. I don't recollect specific
 7 conversations along those things.
 8 Q. You don't recollect him saying that
 9 to you?
 10 A. I don't recollect him saying to me
 11 that Virginia didn't meet [REDACTED]. I'm
 12 sure that wouldn't be a conversation that we
 13 would have. It doesn't effect me whether --
 14 so I'm really only concerned about the lies
 15 that were told as regards to me.
 16 Q. Can Jeffrey Epstein confirm or deny
 17 whether you sent Virginia to give [REDACTED]
 18 a massage?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. I can't say what Jeffrey would say,
 22 I can tell you I didn't. I can't tell you
 23 what anybody else.
 24 Q. Have you discussed with him
 25 Virginia's allegation that she gave [REDACTED]

1 G Maxwell - Confidential
 2 [REDACTED] a massage?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. I didn't know that she did say
 6 that.
 7 Q. Do you know whether Jeffrey Epstein
 8 has ever sent anybody to [REDACTED] to
 9 perform a massage for him?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I couldn't possibly recollect
 13 whether he did anything like that.
 14 Q. Did you ever send anybody, not
 15 Virginia, anybody else over to [REDACTED]
 16 home for a massage?
 17 A. Not to the best of my knowledge.
 18 Q. Do you know one of [REDACTED]
 19 [REDACTED] friend by the name of [REDACTED]
 20 [REDACTED]
 21 A. I do recollect a person of that
 22 name.
 23 Q. How do you know her?
 24 A. I don't recollect.
 25 Q. Did you meet her through Jeffrey?

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 2 A. I don't recollect.
 3 Q. Do you recall when you met her?
 4 A. I do not recollect.
 5 Q. How many times have you seen [REDACTED]
 6 [REDACTED] in your life?
 7 A. The only reason I remember is
 8 because it's an unusual name but I couldn't
 9 tell you anything else.
 10 Q. You didn't see her on a regular
 11 basis, she wasn't one of your friends?
 12 A. No.
 13 Q. Was [REDACTED] a masseuse?
 14 A. Not to my knowledge.
 15 Q. Do you have knowledge of whether
 16 she had a sexual relationship with Jeffrey
 17 Epstein?
 18 A. I have no knowledge of that.
 19 Q. When was the last time you spoke
 20 with her?
 21 A. A very long -- I have no idea.
 22 Q. Would it be years?
 23 A. Yes.
 24 Q. What do you remember about [REDACTED]
 25 [REDACTED]

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 2 A. Nothing really.
 3 Q. Do you remember what she looks
 4 like?
 5 A. I would just be speculating on how
 6 I remember. I couldn't describe her.
 7 Q. Do you recall traveling with her?
 8 A. I don't.
 9 Q. Did you ever go to her home?
 10 A. I don't believe I did.
 11 Q. Do you know where she lives?
 12 A. I don't.
 13 Q. Would you have met her through
 14 Jeffrey Epstein?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. I already testified I don't
 18 recollect how I met her and I remember her
 19 because her name is very unusual.
 20 Q. So what's your -- what recollection
 21 do you have of her, do you have a specific
 22 recollection of meeting her somewhere, you
 23 just don't know when that was or how do you
 24 know that name [REDACTED]?
 25 MR. PAGLIUCA: Objection to the

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 2 form and foundation.
 3 A. I don't know why the name is -- I'm
 4 sorry -- I can't -- I have no idea. I
 5 recognize the name but that's it.
 6 Q. Was [REDACTED] a masseuse?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. What are you asking me, I'm sorry?
 10 Q. When [REDACTED] worked for
 11 Jeffrey Epstein, did she perform massages?
 12 A. I've testified that when [REDACTED]
 13 came originally, she came to answer
 14 telephones. I believe at some point she
 15 became a masseuse. I don't recollect when
 16 and I personally had massages from [REDACTED].
 17 Q. What did [REDACTED] do for Jeffrey
 18 Epstein, did she perform massages, anything
 19 else?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. When she came she answered phones
 23 and at some point, I believe, I don't have
 24 any firm recollection, but I believe she went
 25 to school and became a masseuse and I had

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 2 massages from her.
 3 Q. Did you ever have any sexual
 4 interaction with her?
 5 MR. PAGLIUCA: Object to the form
 6 and foundation and I'm going to instruct
 7 you if we're talking about any
 8 consensual adult contact, you are not
 9 allowed to answer the question.
 10 Q. Did you have any sexual contact
 11 with her in the presence of Jeffrey Epstein?
 12 MR. PAGLIUCA: Same instruction.
 13 Q. Did you have any sexual contact
 14 with her in the presence of anybody other
 15 than Jeffrey Epstein?
 16 MR. PAGLIUCA: Same instruction.
 17 Q. How many massages did you receive
 18 from [REDACTED]?
 19 A. I really don't recall but a fair
 20 amount.
 21 Q. Did the massages involve sex?
 22 MR. PAGLIUCA: I'm going to
 23 instruct you not to answer.
 24 Q. Have you ever engaged in sex with
 25 any female?

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 2 MR. PAGLIUCA: I'm going to
 3 instruct you not to answer.
 4 MS. McCAWLEY: I want the record to
 5 reflect that Ms. Maxwell's attorney is
 6 directing her not to answer this series
 7 of questions.
 8 MR. PAGLIUCA: It definitely does.
 9 Q. Were you responsible for
 10 introducing [REDACTED] to Jeffrey Epstein?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I already testified that I don't
 14 really recall [REDACTED].
 15 Q. Were you responsible for
 16 introducing Johanna to Jeffrey Epstein?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. Again, I don't like the
 20 characterization of introduction. [REDACTED]
 21 came to answer telephones.
 22 Q. When did you -- were you the person
 23 who brought or introduced or met [REDACTED] for
 24 purposes of bringing her to Jeffrey Epstein's
 25 home?

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 2 MR. PAGLIUCA: Objection to the
 3 form and foundation.
 4 A. That's not how I would characterize
 5 that.
 6 Q. How would you characterize it?
 7 A. I have testified that I'm
 8 responsible for finding professional people
 9 to work in the homes, age appropriate adult
 10 people, so from pool attendants, to
 11 gardeners, to chefs, to housekeepers, to
 12 butlers, to chauffeurs and one of the
 13 functions was to be able to answer the
 14 telephones and in the context of finding
 15 someone to answer the telephones, I did look
 16 to try to find appropriate people to answer
 17 the phones.
 18 Q. So did you find Johanna for
 19 purposes of that role?
 20 A. So in the course of looking for
 21 somebody to answer phones at the house,
 22 Johanna was one of the people who said that
 23 she was willing to answer phones.
 24 Q. Did you approach her at her school
 25 campus?

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 2 MR. PAGLIUCA: Objection to form
 3 and foundation.
 4 A. I honestly don't recall how, in
 5 that moment, how I met [REDACTED] and how she
 6 came to get the job but...
 7 Q. Did you typically, in your work for
 8 Jeffrey Epstein, would you typically go to
 9 school campuses to try to find individuals to
 10 work for Jeffrey Epstein?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I never -- what do you mean by
 14 school? Let's characterize school.
 15 Q. Any kind of school.
 16 A. Obviously not. I never went to any
 17 school with young people. [REDACTED], I believe
 18 came from an adult university, as I would
 19 know in England, so university, I went there
 20 but I never went, as I best recollect,
 21 anywhere else.
 22 Q. Did you -- what university was it
 23 that you went to?
 24 A. I don't recall the university that
 25 she went to right now.

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 2 Q. Would you visit more than one
 3 university to try to find individuals to work
 4 for Jeffrey Epstein?
 5 A. As I recollect, I think that's, in
 6 fact, the only university I went to.
 7 Q. Did you go there more than once?
 8 A. I think I went twice.
 9 Q. Who else did you find from that
 10 university, was there anybody other than
 11 [REDACTED]?
 12 A. I don't recollect, I'm sorry.
 13 Q. We are going to mark this as
 14 Maxwell 13?
 15 (Maxwell Exhibit 13, documents,
 16 marked for identification.)
 17 Q. Can you take a look at the document
 18 I put in front of you, please.
 19 Are you familiar with this
 20 document?
 21 A. I'm familiar with this actual
 22 document.
 23 Q. How was this document created?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

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 2 A. I don't know how this document was
 3 created.
 4 Q. You were involved in the creation
 5 of this document?
 6 A. I think you can see from the date
 7 that it's 2004, 2005, so no.
 8 Q. You weren't involved in the
 9 creation of this document.
 10 Did you -- we talked earlier about
 11 Mr. Epstein's house, I'm talking about the
 12 Palm Beach house where you said there was a
 13 computer on the desk, that employees had
 14 access to -- people who worked for Jeffrey
 15 Epstein may have had access to?
 16 A. I think anybody could have had
 17 access to that.
 18 Q. Was that computer used, if you know
 19 to keep a log of addresses and phone contact
 20 information for Jeffrey Epstein?
 21 A. Are we talking about when this
 22 document was created.
 23 Q. In general, was there, on that
 24 computer during the time that you were
 25 present with Jeffrey Epstein, was there a

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 2 mechanism by which you kept electronic
 3 information of names and addresses of
 4 individuals that he knew?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. I can't testify to what was on that
 8 computer or not after I was gone.
 9 Q. Not when you were gone, when you
 10 were there. If Jeffrey wanted to call, for
 11 example, say [REDACTED], would someone be
 12 able to go to that computer to pull up the
 13 address information and phone contact
 14 information for that individual?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. I couldn't possibly say.
 18 Q. Did you ever have to keep track of
 19 address or phone contact information for
 20 Jeffrey Epstein?
 21 A. That was not my job.
 22 Q. Did you ever do it?
 23 A. I am not responsible for keeping
 24 his numbers so that wasn't my job at all.
 25 Q. But did you ever do it? I know

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 2 it's not your job but did you ever do it, did
 3 you ever keep phone contact information for
 4 him?
 5 A. During the course of the time we
 6 were together, if he gave me a telephone
 7 number, I would give it to an assistant to
 8 put in the computer, I could do that.
 9 Q. Would he ask you for contact
 10 information for different individuals, if he
 11 wanted to contact someone?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. In the course of the long period of
 15 time when I was there, it certainly would be
 16 possible for him to ask me for a telephone
 17 number and if I had the -- I wouldn't always
 18 have it -- I'm sure it happened.
 19 Q. Was there a hardcopy book in
 20 addition to the computer, a hardcopy book
 21 that you could look for numbers that were
 22 relevant to Jeffrey Epstein's life and
 23 something on the computer or was it just an
 24 electronic version?
 25 MR. PAGLIUCA: Objection to the

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 2 form and foundation.
 3 Q. Was there a hard copy book as well
 4 as something on the computer or was there
 5 only electronic information on the phone
 6 numbers?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I can only testify to what I know
 10 obviously, and I believe that this is a copy
 11 of a stolen document. I would love to know
 12 how you guys got it.
 13 Q. I'm asking during the time you
 14 worked for Jeffrey Epstein, was there a
 15 hardcopy document of any kind that kept phone
 16 numbers for Jeffrey Epstein, if he needed to
 17 contact someone?
 18 A. The stolen document I have in front
 19 of me that you have is what you are referring
 20 to.
 21 Q. So there was, during your time when
 22 you were there, there was no other, you
 23 mentioned there was information on a
 24 computer. Was there any hardcopy document
 25 that you could refer to to find someone's

1 G Maxwell - Confidential
 2 number?
 3 A. You have the stolen document in
 4 front of you.
 5 Q. You had access to this when you
 6 worked for Jeffrey Epstein?
 7 A. This is, I believe, the book that
 8 was stolen, that was the hardcopy of whatever
 9 was there.
 10 Q. So when you were working for
 11 Jeffrey Epstein, you were able to access this
 12 book?
 13 A. This book -- if this is what this
 14 is, I believe it was, this is the stolen
 15 document from his house.
 16 Q. And you were able to access it when
 17 you worked for him?
 18 A. It was a document that was printed
 19 that you could, if you needed to, look for a
 20 number.
 21 Q. Do you know how this book was
 22 created?
 23 A. No.
 24 Q. When you referred to it a moment
 25 ago, to a stolen document, when [REDACTED]

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 2 [REDACTED] turned this document over to the
 3 FBI, are you aware he described it as a
 4 document that came from your computer?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. I have no idea what he said or
 8 didn't say, so if you want me to reference
 9 something he said, you need to show it to me.
 10 Q. Did you keep this document, an
 11 electronic copy of it, on your personal
 12 computer?
 13 A. I don't recollect.
 14 Q. If you had to update something, for
 15 example, if there was a new number, a new
 16 individual that Jeffrey had hired that you
 17 were going to track, would you input that
 18 information into this document on your
 19 computer?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I've already testified that I'm not
 23 responsible for updating and keeping these
 24 records.
 25 Q. Did you have this document on your

1 G Maxwell - Confidential
 2 computer, your personal computer?
 3 A. I told you, I don't recollect
 4 having this document on my computer.
 5 Q. Do you know what computers this
 6 document was on, if more than one?
 7 A. I'm sorry, this is a long time ago
 8 and I don't recall exactly how this was all
 9 managed.
 10 Q. If you didn't create this document,
 11 do you know who did?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I don't.
 15 Q. I'm going to direct your attention
 16 to part of this document. It's towards the
 17 back, it's going to be page 91 and it has
 18 bates label Giuffre 001663. I'm going to
 19 direct your attention to the section that
 20 says, Massage Florida.
 21 Did you input any of the names or
 22 numbers under that section?
 23 MR. PAGLIUCA: Objection to form
 24 and foundation.
 25 A. So this document is produced in

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 2 2004, 2005, so, no.
 3 Q. But I'm sorry, correct me if I'm
 4 misunderstanding your testimony, I thought
 5 you said when you were working with Jeffrey,
 6 that this document existed and it was
 7 something you utilized?
 8 A. I can't possibly tell you what
 9 numbers were added or not added subsequent to
 10 my departure.
 11 Q. So you can't recall if you added
 12 any of these numbers?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation, mischaracterizes
 15 the witness' testimony.
 16 Q. Are there any numbers on here or
 17 names that you recognize that you would have
 18 entered into this section?
 19 A. I already testified that I'm not
 20 responsible for inputting numbers and names
 21 into this so I would not be able to tell you.
 22 Q. Are there any names or numbers
 23 under this section, Massage Florida, that you
 24 would have provided to an assistant to input
 25 into this document?

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 2 A. I can't possibly say.
 3 Q. Do you see under Massage Florida,
 4 about halfway down the first column, do you
 5 see a number that says [REDACTED] cell?
 6 MR. PAGLIUCA: What page?
 7 Q. It's 91, Bates number 001663.
 8 About halfway down, it says in the first
 9 column, it says [REDACTED] cell.
 10 Do you see that?
 11 A. I do.
 12 Q. Would you have provided after, I
 13 know you didn't hire her, Jeffrey hired her
 14 but after you brought her to Jeffrey, would
 15 you have given her cell phone number to an
 16 assistant to input into this document?
 17 MR. PAGLIUCA: Objection to form
 18 and foundation.
 19 A. I didn't bring her to Jeffrey, the
 20 way you characterize and I would have no
 21 knowledge of how this number ended up in this
 22 book.
 23 Q. I believe you, and I will try to
 24 use your words so we are clear, you met
 25 [REDACTED], is that correct?

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 2 A. Yes.
 3 Q. And then she began working for
 4 Jeffrey?
 5 A. Yes.
 6 Q. Would you have provided whomever
 7 was in charge of keeping this updated with
 8 [REDACTED] cell number so you would be able to
 9 contact her if needed?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I don't know. It could have been a
 13 number of different ways, it it could have
 14 been Jeffrey who gave it to somebody.
 15 Q. You just don't remember doing that?
 16 A. I do not.
 17 Q. Now, as you look -- I want you to
 18 take a look at the Florida massage list, it's
 19 three columns there.
 20 Do you, as you look at those names
 21 on the various columns, do you know the ages
 22 of any of the girls in this list?
 23 A. I don't know. One, I don't know
 24 who all the people are on this list and I
 25 certainly don't know the ages.

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 2 Q. Do you know what their
 3 qualifications are?
 4 A. I don't know who the people are in
 5 general so of course I don't know what their
 6 qualifications are.
 7 Q. Do you know why Jeffrey has so many
 8 masseuses listed in Florida in his book here?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. Again, this book was created post
 12 my departure, so I couldn't explain why all
 13 these people were here.
 14 Q. When you were there, you said this
 15 book existed?
 16 A. Yes.
 17 Q. So when you were there, were there
 18 a number of masseuses listed under the
 19 Florida massage?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation and
 22 mischaracterization of the witness'
 23 testimony.
 24 Q. I'm asking you a question.
 25 When you were there, were there a

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 2 number of masseuses listed under the Florida
 3 massage section?
 4 A. When I was there, I would have, of
 5 course there would have been some masseuses
 6 listed but I could not tell you who or how
 7 many and this -- I could not possibly because
 8 I wouldn't remember.
 9 Q. Do you know why Jeffrey would have
 10 had so many names listed under his massage
 11 Florida?
 12 MR. PAGLIUCA: Objection to form
 13 and foundation.
 14 A. I can't testify to why Jeffrey has
 15 so many.
 16 Q. Did he use a different masseuse
 17 every day?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 Q. You can answer.
 21 A. When I was there he had a massage
 22 roughly every day, one masseuse, and mostly
 23 he would have them at random times, so it
 24 would be difficult if you just only had one
 25 person, man, woman, for an adult massage, to

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 2 come and be available for whatever time it
 3 was. So he would have more than one person
 4 that he could call for a massage because at
 5 any given time the one that he called first
 6 may not have been available.
 7 Q. So would it typically be a
 8 different person each day that would give him
 9 a massage?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. It would be, when I was there,
 13 based on availability.
 14 Q. Would it surprise you to learn that
 15 the Federal Government found that some of the
 16 girls on this list under massage Florida were
 17 under the age of 18?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I can't testify to what the
 21 government found or did not find because I
 22 would have no knowledge of it.
 23 Q. I'm asking if you would be
 24 surprised by that?
 25 MR. PAGLIUCA: Form and foundation.

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 2 A. I have knowledge of it. I can't
 3 speculate.
 4 Q. On the second column, towards the
 5 bottom, there is the name, it's one up from
 6 the bottom, there is the name [REDACTED],
 7 do you know [REDACTED] ?
 8 A. I do.
 9 Q. Who is she?
 10 A. She was a friend of Jeffrey's.
 11 Q. Is she a masseuse?
 12 A. She, I don't think she was a
 13 masseuse, no.
 14 Q. Why would be she listed under
 15 Florida massages?
 16 A. An input error.
 17 Q. Is this list any individual that
 18 would have sex with Jeffrey?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. I wouldn't have any knowledge of
 22 that.
 23 Q. Do you know if Jeffrey had sex with
 24 [REDACTED] ?
 25 MR. PAGLIUCA: Object to the form

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 2 and foundation.
 3 A. First of all, I wouldn't have any
 4 knowledge of that.
 5 MS. McCAWLEY: We are going to take
 6 a quick break.
 7 THE VIDEOGRAPHER: It's now 4:39
 8 and we are off the record.
 9 (Recess.)
 10 THE VIDEOGRAPHER: It's now 4:54
 11 and we are as back on the record
 12 starting disk number 8.
 13 Q. Ms. Maxwell, we were talking
 14 earlier about the journal and I believe you
 15 said in 2004, 2005, you were no longer
 16 working and responsible for that journal, is
 17 that correct?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. What are we referring to, this
 21 document right here?
 22 Q. Yes.
 23 A. I don't know who is the author of
 24 this or I can't tell you what is in here
 25 versus what would have been here when I was

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 2 around. I can't testify to that.
 3 Q. Were you around in 2004, 2005?
 4 A. I already testified that I was
 5 there when Jeffrey's mother passed away and
 6 so you know, I did visit for her passing and
 7 I believe I was there for a couple of days in
 8 2005.
 9 Q. So if an employee of Mr. Epstein in
 10 2004 said that you were the employee's direct
 11 supervisor, would that be incorrect?
 12 MR. PAGLIUCA: Objection to form
 13 and foundation.
 14 A. What employee, what's the
 15 circumstances and what is the story, I don't
 16 know what you are asking me.
 17 Q. If [REDACTED] said in 2004
 18 when he was hired, you were his direct
 19 supervisor, would that be true?
 20 A. No.
 21 Q. Were you in 2004 supervising [REDACTED]
 22 [REDACTED] ?
 23 MR. PAGLIUCA: Objection to form
 24 and foundation.
 25 A. I never supervised [REDACTED].

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 2 Q. Did [REDACTED] take orders from
 3 you?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 A. She worked for Jeffrey.
 7 Q. If [REDACTED] said you had
 8 knowledge of underage girls coming to
 9 Jeffrey's home for the purpose of sex, would
 10 you contend that that is truthful?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation of the question.
 13 A. I have no idea what you are talking
 14 about, I'm sorry.
 15 Q. If [REDACTED] said that you
 16 have knowledge of underage girls coming to
 17 Jeffrey's home for the purpose of having
 18 massages involving sex, would you say that
 19 that statement is truthful?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I can't testify to what [REDACTED]
 23 said or didn't say.
 24 Q. I'm saying if [REDACTED] said that you
 25 had knowledge that there were girls coming

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 2 over to the house that were underage for the
 3 purposes of sex, would that statement be
 4 true?
 5 MR. PAGLIUCA: Objection to form
 6 and foundation.
 7 A. I can't testify to what [REDACTED]
 8 said or didn't say or what he thought.
 9 Q. Did you have knowledge of underage
 10 girls coming to Jeffrey Epstein's house for
 11 the purpose of sex?
 12 A. No.
 13 Q. Earlier I believe you testified,
 14 correct me if I'm wrong, that the document
 15 that is in front of you, the thicker document
 16 was a stolen document.
 17 Do you know who stole that
 18 document?
 19 A. I have read that [REDACTED] stole the
 20 document.
 21 Q. And where have you read that?
 22 A. I believe it was reported in the
 23 press.
 24 Q. Earlier we were talking about the
 25 computers at Jeffrey Epstein's home. Did you

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 2 have a computer that was your computer
 3 located in Jeffrey Epstein's home?
 4 MR. PAGLIUCA: Objection to form
 5 and foundation.
 6 A. I've testified to the computer
 7 already. Even when I was around, there was a
 8 computer that people had access to.
 9 Q. So is [REDACTED] telling the
 10 truth when he says that he downloaded that
 11 book from your computer?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I couldn't possibly tell you what
 15 [REDACTED] did or didn't do or said or didn't
 16 say.
 17 Q. Was it on your computer?
 18 A. I already testified I have no idea
 19 where this document came from.
 20 Q. Did you have a list of names of
 21 individuals with contact information for
 22 Jeffrey Epstein on your personal computer?
 23 A. Again, that wasn't my computer. I
 24 already said that was a computer that lots of
 25 people would have, so I have no recollection

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 2 of this document being on it, so I don't know
 3 where this came from.
 4 Q. I understand the computer at the
 5 house that you're referencing. On a personal
 6 computer of yours, did you have that
 7 document?
 8 A. I don't know where this document
 9 came from, so I can't possibly say this
 10 document was on any computer that I may have
 11 had access to.
 12 Q. On a personal computer of your own,
 13 did you have lists of the phone numbers and
 14 contact information relating to Jeffrey
 15 Epstein?
 16 A. Like everybody, I have an address
 17 book but I can't possibly testify to where
 18 this thing came from.
 19 Q. Was it your address book or was it
 20 addresses that related to Jeffrey Epstein?
 21 MR. PAGLIUCA: Objection to the
 22 form and foundation.
 23 A. I don't know what you're asking me.
 24 Q. On your personal computer, the
 25 address book you are referencing, was it your

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 2 address book with individuals you knew or was
 3 it an address book for your employer, Jeffrey
 4 Epstein?
 5 A. Jeffrey has his situation and I
 6 have no -- this is Jeffrey's, it came from
 7 his home, so I can't testify to anything
 8 about this in that period of time.
 9 Q. So you didn't have on your computer
 10 a list of contact information for individuals
 11 that was related to Jeffrey Epstein?
 12 A. I don't recall exactly what I had
 13 back in 2004 and 2005, so I can't say what I
 14 had back then that relates to his addresses,
 15 I can't recall.
 16 Q. So is it possible that someone
 17 could have downloaded from your personal
 18 computer a list of names and address that
 19 were affiliated with Jeffrey Epstein?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. This didn't come from any computer
 23 of mine.
 24 Q. But is it possible that someone
 25 could have downloaded a list of names and

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 2 addresses affiliated with Jeffrey Epstein
 3 from your computer?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 A. I already said, I didn't have a
 7 computer there, so I don't know where this
 8 came from, I have no idea.
 9 Q. I'm going to read to you some
 10 testimony from [REDACTED] deposition
 11 and it's on page 370 and I want to ask you a
 12 question about it, if it's true or false?
 13 MR. PAGLIUCA: I'm going to object
 14 unless you show the witness the
 15 document.
 16 MS. McCAWLEY: I will pass it. We
 17 are not going to mark it. We will skip
 18 it.
 19 Q. Did you ever tell [REDACTED]
 20 that he better watch out and better keep his
 21 mouth shut with respect to what occurred at
 22 Mr. Epstein's home?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. It doesn't sound like anything I

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 2 would say.
 3 Q. Did you ever threaten [REDACTED]
 4 [REDACTED] in any way if he were to disclose
 5 information he learned from his employment
 6 with Jeffrey Epstein?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I'm happy to answer. No, I never
 10 threatened him in any way.
 11 Q. Were you concerned that he was
 12 going to disclose that Jeffrey Epstein was
 13 trafficking underage girls?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation.
 16 A. First of all, there are so many
 17 things wrong with that question, but I have
 18 no knowledge of what you are talking about.
 19 Q. Have you ever contacted or
 20 instructed anyone to contact any witness in
 21 this case for the purposes of threatening
 22 them not to testify in this case?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. I have never called anybody with

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 2 reference to this case with any, anything you
 3 just mentioned, I never threatened anyone.
 4 Q. Have you ever directed anyone to
 5 call any witnesses relevant to this case and
 6 threaten them not to testify?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I never done such a thing.
 10 Q. Did Jeffrey Epstein or you ever ask
 11 any female, regardless of age, to carry
 12 Jeffrey's baby for him?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation.
 15 Q. Or anything along those lines?
 16 MR. PAGLIUCA: Objection to the
 17 form and foundation.
 18 A. Can you repeat the question,
 19 please?
 20 Q. Did you or Jeffrey Epstein ever ask
 21 any female, regardless of age, to carry
 22 Jeffrey Epstein's baby for him?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. Are you asking --

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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 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. McCRAWLEY: 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. McCRAWLEY: I was just trying to
 25 pronounce it.

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 2 Q. This email reads do you want
 3 [REDACTED], without a vowel, to come out and say
 4 she was the girlfriend during the time.
 5 Who was Jeffrey Epstein referring
 6 to?
 7 A. I believe he was referring to
 8 [REDACTED].
 9 Q. Why was he asking you if you wanted
 10 [REDACTED] to come out and say she was the
 11 girlfriend?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. The way the press and you were
 15 characterizing me is I was with Jeffrey
 16 throughout this entire period of time and I
 17 was not.
 18 Q. Was [REDACTED] with Jeffrey during this
 19 period of time?
 20 A. I believe she was.
 21 Q. Did Jeffrey come out and tell the
 22 press it was [REDACTED] and not you that was with
 23 him as he is proposing here?
 24 A. I don't believe he did.
 25 Q. Did you want him to do that?

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 2 A. No, I didn't ask him to do
 3 anything. No.
 4 Q. So do you know in January of 2015,
 5 was [REDACTED] his girlfriend?
 6 A. 2015, I have no idea who was his
 7 girlfriend in 2015.
 8 Q. I'm sorry, you are correct.
 9 In the period of 1999 to 2002, was
 10 [REDACTED] his girlfriend?
 11 A. They spent a lot of time together.
 12 Q. Did you talk to [REDACTED] about going
 13 to the press and saying that she was the
 14 girlfriend and not you?
 15 A. I have never spoken to [REDACTED]
 16 Q. Was [REDACTED] offered any money to
 17 make a statement that she was the girlfriend?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I have no idea. I have never
 21 spoken to [REDACTED] and I don't know anything --
 22 I have no idea.
 23 (Maxwell Exhibit 19, email, marked
 24 for identification.)
 25 Q. That's an email from Jeffrey to