

McCawley Declaration

EXHIBIT 4

(Filed Under Seal)

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
2 IN AND FOR BROWARD COUNTY, FLORIDA
3 CASE NO. 15-000072

4 BRADLEY J. EDWARDS and PAUL G.
5 CASSELL,

6 Plaintiffs,

7 - vs -

CONFIDENTIAL

8 ALAN M. DERSHOWITZ,

9 Defendant.

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10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11

12 Saturday, January 16, 2016
13 9:07 a.m. - 2:48 p.m.

14

15 401 East Las Olas Blvd., Suite 1200
16 Fort Lauderdale, Florida 33301

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20 Reported By:

21 Deborah A. Harris, Court Reporter
22 Notary Public, State of Florida
23 Phone - 305.651.0706

24

25

Job No. J0277789

1 mean, that could have not been exactly what was said, but
2 those are generalities of what was said.

3 Q. Who else was in the house at this time?

4 A. Epstein for a fact. I'm not too sure about
5 Ghislaine and [REDACTED], they could have been. Definitely
6 house staff.

7 Q. Who?

8 A. [REDACTED] and [REDACTED]
9 [REDACTED], I'm not too sure.

10 Q. How often were you sexual trafficked in
11 Jeffrey Epstein's private bedroom?

12 MS. MCCAWLEY: Objection. Which bedroom
13 are you talking about?

14 BY MS. BORJA:

15 Q. The same bedroom in New York that you were
16 talking about?

17 A. That's actually the only time besides with
18 Jeffrey. I mean, Jeffrey countless, but there was no
19 other men brought to Jeffrey's room.

20 Q. Who brought Professor Dershowitz to this
21 room?

22 A. I have no idea, I'm assuming Epstein.

23 Q. Help me figure this out. Epstein had just
24 left the room?

25 A. Epstein exits the room, Dershowitz walks

1 in.

2 Q. Same door?

3 A. Same door.

4 Q. How long before Jeffrey exiting and
5 Professor Dershowitz walking in?

6 A. Minutes, not even, approximately
7 60 seconds.

8 Q. Ten minutes later once the sex encounter
9 ends, what happens next?

10 A. He pulled up his pants and I put my towel
11 back on. I went upstairs to my room -- my room was
12 downstairs, had another shower, I got dressed. I don't
13 remember the rest of the day from there.

14 Q. Did you see Professor Dershowitz in the
15 house again that day?

16 A. On that day?

17 Q. Right.

18 A. Possibly, I mean, I don't remember. I just
19 remember that event very clearly.

20 Q. So it was unusual that somebody other than
21 Jeffrey to whom you would be sexual trafficked would walk
22 into Jeffrey's bedroom, is that fair?

23 A. Yes.

24 Q. Did you ask anybody how that came to be?

25 A. No, it was expected of me.

1 Q. Did you talk to Jeffrey about it?

2 A. Yes.

3 Q. What did you tell Jeffrey?

4 A. Jeffrey asked me if he enjoyed it, I said
5 yes.

6 Q. So the act was consummated?

7 MS. MCCAWLEY: Objection.

8 A. What does consummated mean?

9 MS. MCCAWLEY: If you don't know you don't
10 answer.

11 SPECIAL MASTER: Rephrase that.

12 BY MS. BORJA:

13 Q. What do you mean by your testimony that
14 Professor Dershowitz enjoyed it?

15 MS. MCCAWLEY: Objection. Mischaracterizes
16 the testimony.

17 SPECIAL MASTER: You can answer if you can.

18 A. I don't even understand. What do you mean,
19 did he enjoy it?

20 MS. MCCAWLEY: Take a deep breath. She can
21 re-ask the question.

22 A. He enjoyed it, yes. From what it looked
23 like, my God, yes, he enjoyed it.

24 Q. Why do you say that?

25 MS. MCCAWLEY: Take a deep breath.

1 A. He ejaculated. He was happy.

2 Q. Tell me about the next incident that you
3 can recall of the sex?

4 MS. MCCAWLEY: Do you want to take a break?

5 THE WITNESS: Yes, absolutely.

6 SPECIAL MASTER: Let's take a break, five
7 minutes.

8 THE VIDEOGRAPHER: Going off video record,
9 11:11 a.m.

10 (A recess was taken.)

11 THE VIDEOGRAPHER: We are now back on video
12 record 11:31 a.m., disk number 2.

13 BY MS. BORJA:

14 Q. Is there anything else that you can recall
15 that would help you to place the time frame of this
16 sexual encounter of Professor Dershowitz in New York?

17 A. No, not that I can remember.

18 Q. Do you recall whether it was before or
19 after the first time you met [REDACTED]?

20 A. Before.

21 Q. About how long before do you think?

22 A. I don't know. It was fairly early on in my
23 relationship with Jeffrey that I first met him, but it
24 was after my training so I'm not too sure.

25 Q. And your training was about nine months, is