

COMPOSITE  
EXHIBIT 3  
(File Under Seal)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x  
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x  
June 21, 2016

9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RE CAREY, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 Ghislane Maxwell?

3 A. I wanted to speak with everyone related to  
4 this home, including Ms. Maxwell. My contact was  
5 through Gus, Attorney Gus Fronstin, at the time, who  
6 initially had told me that he would make everyone  
7 available for an interview. And subsequent  
8 conversations later, no one was available for  
9 interview and everybody had an attorney, and I was  
10 not going to be able to speak with them.

11 Q. Okay. During your investigation, what did  
12 you learn in terms of Ghislane Maxwell's  
13 involvement, if any?

14 MR. PAGLIUCA: Object to form and  
15 foundation.

16 THE WITNESS: Ms. Maxwell, during her  
17 research, was found to be Epstein's long-time  
18 friend. During the interviews, Ms. Maxwell was  
19 involved in seeking girls to perform massages  
20 and work at Epstein's home.

21 MR. PAGLIUCA: Object to form and  
22 foundation.

23 BY MR. EDWARDS:

24 Q. Did you interview -- how many girls did  
25 you interview that were sought to give or that

1 JOSEPH RE CAREY - CONFIDENTIAL

2 I guess I'll start with where it says on 4/4/2005, I  
3 just want to ask you, was a voice mail message taken  
4 into evidence from HR to SG?

5 A. Yes.

6 Q. Okay. And the purpose of that evidence is  
7 to corroborate what?

8 MR. PAGLIUCA: Object to form and  
9 foundation.

10 THE WITNESS: It was actually a phone call  
11 from HR to SG confirming an appointment to go  
12 work at Epstein's residence.

13 BY MR. EDWARDS:

14 Q. The next line down is what I wanted to  
15 focus on, April 5th, 2005.

16 This trash pull, what evidence is yielded  
17 from this particular trash pull?

18 MR. PAGLIUCA: Object to form and  
19 foundation.

20 THE WITNESS: The trash pull indicated  
21 that there were several messages with written  
22 items on it. There was a message from HR  
23 indicating that there would be an 11:00  
24 appointment. There were other individuals that  
25 had called during that day.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. And when you would -- when you would see  
4 females' names and telephone numbers, would you take  
5 those telephone numbers and match it to -- to a  
6 person?

7 MR. PAGLIUCA: Object to form and  
8 foundation.

9 THE WITNESS: We would do our best to  
10 identify who that person was.

11 BY MR. EDWARDS:

12 Q. And is that one way in which you  
13 discovered the identities of some of the other what  
14 soon came to be known as victims?

15 MR. PAGLIUCA: Object to form and  
16 foundation.

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

19 Q. Okay. There's the second paragraph from  
20 the bottom, it starts, "Detective Leigh provided  
21 trash from 4/06, 4/07/2005."

22 Do you see that?

23 A. Yes.

24 Q. And what is the purpose of the indication  
25 that "the following information was retrieved: Jet

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. Okay. Also reflected are the property  
4 receipts?

5 MR. PAGLIUCA: Object to form and  
6 foundation.

7 THE WITNESS: Correct.

8 BY MR. EDWARDS:

9 Q. All right.

10 And where were those taken from, in terms  
11 of whose property is that?

12 MR. PAGLIUCA: Object to form and  
13 foundation.

14 THE WITNESS: This would have been taken  
15 from the home of Jeffrey Epstein.

16 BY MR. EDWARDS:

17 Q. And in reviewing that evidence, were you  
18 able to substantiate or corroborate certain victims'  
19 accounts of their allegations of having been at the  
20 house?

21 MR. PAGLIUCA: Object to form and  
22 foundation.

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. Did you find names of other witnesses and

1 JOSEPH RE CAREY - CONFIDENTIAL

2 people that you knew to have been associated with  
3 the house in those message pads?

4 MR. PAGLIUCA: Object to form and  
5 foundation.

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. And so what was the evidentiary value to  
9 you of the message pads collected from Jeffrey  
10 Epstein's home in the search warrant?

11 MR. PAGLIUCA: Object to form and  
12 foundation.

13 THE WITNESS: It was very important to  
14 corroborate what the victims had already told  
15 me as to calling in and for work.

16 BY MR. EDWARDS:

17 Q. Okay. And did you learn the identities of  
18 some of the other individuals associated with  
19 Jeffrey Epstein through the review of that  
20 particular evidence?

21 MR. PAGLIUCA: Object to form and  
22 foundation.

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. Okay. And what did you do with that

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AFFIDAVIT

STATE OF FLORIDA )  
COUNTY OF )

I, \_\_\_\_\_, being first  
duly sworn, do hereby acknowledge that I did  
read a true and certified copy of my deposition  
which was taken in the case of GIUFFRE V.  
MAXWELL, taken on the 24th day of September,  
2016, and the corrections I desire to make are  
as indicated on the attached Errata Sheet.

CERTIFICATE

STATE OF FLORIDA )  
COUNTY OF )

Before me personally appeared

\_\_\_\_\_,  
to me well known / known to me to be the  
person described in and who executed the  
foregoing instrument and acknowledged to and  
before me that he executed the said instrument  
in the capacity and for the purpose therein  
expressed.

Witness my hand and official seal, this  
\_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
(Notary Public)

My Commission Expires:

