Case 1:15-cv-0/43	<u>3-LAP Documer</u>	<u>nt 1327-1 Filed (</u>	<u>)1/05/24 Page 1 (</u>	of 26
	EXH	IBIT 9		
/Τ	7°1 TT	1 0	1\	
1)	ile Un	ider Se	eal)	

2.

UNCERTIFIED TRANSCRIPT DISCLAIMER IN THE MATTER OF

Virginia L. Giuffre

Ghislaine Maxwell

The following transcript of proceedings, or any portion thereof, in the above-entitled matter, taken on any date, is being delivered UNEDITED and UNCERTIFIED by the official court reporter at the request of ordering attorney.

This is an unofficial transcript, which should NOT be relied upon for purposes of verbatim citation of testimony.

This transcript has not been checked, proofed or corrected. It is a draft transcript, NOT a certified transcript. As such, it may contain computer-generated mistranslations of stenotype code or electronic transmission errors, resulting in inaccurate or nonsensical word combinations, or untranslated stenotype symbols which cannot be deciphered by non-stenotypists. Corrections will be made in the preparation of the certified transcript, resulting in differences in content, page and line numbers, punctuation and formatting.

This uncertified unedited transcript contains no appearance page, certificate page, index or certification.

1	START TIME: 8:57 a.m.
2	THE COURT REPORTER: Do you declare under
3	penalty of perjury to tell the truth, the whole
4	truth, and nothing but the truth?
5	THE WITNESS:
6	THE VIDEOGRAPHER: In the mart /O*F
7	Virginia L Jeffrey verses Ghislaine Maxwell.
8	Today's date June 24, 2016, and time is
9	8:59 a.m. this is videotaped deposition of Tony
10	Figueroa. Counsel please truce /THEFL after
11	which the court reporter will swear in the
12	witness.
13	MR. EDWARDS: Brad adards I represent
14	Virginia Giuffre. And Virginia Giuffre is here
15	with me as well.
16	MS. MENNINGER: Laura manager on behalf of
17	gelen Maxwell, the Defendant. She is not here.
18	(Off the record at 9:01 a.m.).
19	A Yes.
20	MS. MENNINGER:
21	Q Good morning?
22	A Good morning.
23	Q Can you state your full name and spell
24	your last name for the record?
25	A My name is Anthony Lewis Zach Figueroa

Southern Reporting Company (386)257-3663

```
1
    /EUFPB 2001?
2.
               MS. MENNINGER: /TPOPBLGZ form /TPOUPBLZ.
3
         Α
               No.
4
         Q
               How do you know that?
5
               Because she did not have a job anywhere
         Α
6
    else.
7
               How frequently during that period of time
         0
8
    would she be going over to Jeffrey epistipes house?
               MS. MENNINGER: Object to the form
10
          foundation.
11
         Α
               When I was with her she would go over
12
    there two weeks out of every month.
13
               And how often what is the frequency you
14
    would be the person take her to his house?
15
                                /TPOPBLGZ form /TPOUFRPZ.
               MS. MENNINGER:
16
               Pretty much whenever she was leaving to go
         Α
17
    on a trip I would drive her there.
18
    BY MR. EDWARDS:
19
         0
               Times when she went therein during the day
20
    and came back that night?
21
         Α
               Yes.
22
               And would you be the person that drove her
         0
23
    on those occations too?
24
         Α
               No.
25
               She would drive herself on those
         Q
```

```
occasions?
1
2.
         Α
               Yeah.
3
         0
               Were there times when you drove her to the
4
    airport, the private airport?
5
               The private airport I picked her up from.
6
    I never drove her there.
7
               Did you see epi/SPAOEPB airplane at the
         0
8
    airport?
         Α
               Yes.
10
         0
               What did it look like?
11
               Object form.
         Α
12
               A big black leer jet I guess it was.
         Α
                                                       Ι
13
    don't know. It was a pretty nice black jet.
14
               Did you observe Virginia entering or
         0
15
    exiting that airplane?
16
               Yes.
         Α
17
               And other than Virginia what other people
    did you observe entering or exiting that airplane?
18
19
         Α
               I'm pretty sure Jeffrey and Ms. Maxwell
20
    were both there.
21
               Can you tell me the first time that you
22
    met Ms. Maxwell. Describe that occasion?
23
         Α
               Like I said we were just pretty much I was
24
    in the house hang out and she was in the kitchen she
25
    was there one of the times I guess. And pretty much
```

1 How many times did you go to Jeffrey 0 2 epi/STAOEPBZ pool area? 3 Α Like three times. 4 And on the three occasions that you went 5 to Jeffrey epi/STAOEPBZ pool area who else was by 6 had pool parea? 7 I understand nobody like I was liltry just 8 sitting out there by myself waiting for her to get done talking with him. But pretty much everytime I 10 was at that house there was just random girls the 11 chef and Ms. Maxwell. 12 At this time in 2000 one your how old are 13 What is your date of birth? 14 March 4th 1982. I'm 34. Α 15 0 Okay. So in 2001 you about 19? 16 Yeah. Α 17 Q When you were at Jeffrey epi/STAOEPBZ 18 house and by the pool? 19 Α Uh-huh. 20 I your describing other girls that were in had house did youknow these other hours? 21 22 No they were like fraught different Α 23 countries. Hoe did you know they waere from different 24 25 contries?

Because whenever they would talk or I 1 Α 2 would hear them say blah blah or she would tell me 3 this girl was this place and that girl was thaw that 4 place. 5 Would could tell from the accent? 0 6 Α Yeah. 7 Would you ever talk to these girls? 0 8 Α Not really. I mean sometimes I would. 9 But not like a conversation about asking what they 10 were doing ear. 11 At this time 19 years old. Can you tell 12 me what the age range of these girls you describing 13 that are foreign girls at Jeffries house? 14 MS. MENNINGER: Objection form 15 TPAUFRPBGZ. 16 They looked about Virginia's age. They Α 17 all looked about that about 17, 18. But I don't 18 I did not ask hem how old they were so I 19 don't know the exact number. 20 BY MR. EDWARDS: 21 Okay. And when you were in the house by 22 the pool by yourself you said Virginia was just I 23 quess describing one occasion Virginia was just talk 24 to them? 25 Jeffrey I don't know about what. Α

1 Was Ms. Maxwell the? O 2. I'm not sure I know she was only there 5 Α 3 or six times out of the whole time I was with her 4 that I met her. 5 All right. And each of the five or six times that you met Ms. Maxwell do I understand it 6 7 correctly that it was inside Jeff sephouse? 8 Α Yes. Each of the 5 or six times that you met 10 Ms. Maxwell inside of Jeffrey's house was your 11 conversation with her always fairly similar stoowhat 12 you described? 13 Α Yeah, it was never like I never talked to 14 her as I would like Jeffrey. Like she never set 15 down with me I had a conversation 0 high how you 16 doing blew blew ahow doing and that would be it. 17 Q Okay. 18 And when St. The first time you met 19 Jeffrey Epstein in relationship the the first time 20 you met Ms. Maxwell. Meaning did you meet him 21 first. Second? 22 I met Jeffrey first. Α 23 0 How did how were you introduced to Jeffrey 24 Epstein? 25 Just high this is Jeffrey this is Tony, Α

```
you know, just casually.
```

2.

Q When is the first time that you were asked by anyone to bring other girls Jeff /AEF epi/STAOEPBZ house?

A Pretty much right after she left. When she would go on trips. They would just ask me if I would find like Jeffrey would say when you get back find more girls to have here blue blue this and that. And then after she went to thiland when he was calling me searching for her he would throw that in there randomly do you have any girls. And then where is Virginia at. Like trying to seem like he was trying to get more information about her than anything after she left but make it seem like still wanted me to be around kind of.

- Q Okay.
- A But I don't know exactly.
- Q Okay. So in the beginning?
- 19 A Uh-huh.
 - Q Of your going over to Jeffrey Epstein house primary it was just you and Virginia?
- A Yeah,.
 - Q At someintp point in time Virginia starts recruiting other girls to go to the house; is that right?

1	Q Describe for us what these girls looked
2	like that were being brought to the house?
3	MS. MENNINGER: Object to the form found
4	vague time to place.
5	BY MR. EDWARDS:
6	Q Sorry let me prephrase the question during
7	this 2001 period if you were driving Virginia and
8	another girl to the house, what type of girls would
9	you be driving?
10	MS. MENNINGER: Form form foundation.
11	A Pretty much like young looking teenager
12	girls 16, 17, really pretty.
13	Q How did you know that's what was being
14	requested that that age range and that look and?
15	A I just assumed that that's what most guys
16	are into.
17	Q Girls that looked like Virginia?
18	A Yeah.
19	Q When you would bring girls over to the
20	house were you looking for some sort of professional
21	mussuese or massge experience?
22	A Just get friends that I knew from school.
23	Q And that's what Jeffrey wanted?
24	A Yeah.
25	MS. MENNINGER: Object form founds.

```
1
    BY MR. EDWARDS:
2.
               How did you know what Jeffrey wanted?
          Q
3
          Α
               That's what he asked me.
4
          Q
               What would he ask you?
5
          Α
                    me to try to find gills a resem
6
    believed like somewhat that type.
7
               And when you would bring these girls that
8
    resem believed Virginia or some type would Jeffrey
    Epstein pay you?
10
               Yes cension form /STKPWHROUPBGZ.
          Α
11
               Would Jeffrey pay you every time?
          Q
12
               Ojbection form foundation.
          Α
13
          Α
               Yes.
14
               And how much would he pay you foreach girl
          0
15
    that you brought to him?
16
               Object form founds.
          Α
17
          Α
               Two hundred dollars apiece.
18
          0
               Where would this transaction tace place?
19
          Α
               Object to the form.
20
               MS. MENNINGER: Object to the form
21
          /TPOUFRPBLZ the living room.
22
    BY MR. EDWARDS:
23
               And how much money do you think overall
          0
24
    Jeffy epistein paid you for bringing girls to him?
               Me personal or us together.
25
          Α
```

Q Sure. How how often did Jeffy Epstein ask you to bring girls to the house?

A Pretty much as much as possible like he would tell us as men girls we could bring the better, so...

- Q When you say us who are the us?
- A Me I Virginia.

- Q So walking me through an example of that you would go thohouse with Virginia and describe what would happen that ultimately let to this conversation that you just describe would Jeff /AEF Epstein?
 - A Well because /THRAOEU explain that.
- Q Sure you I Virginia my initial question was I think you initial answer was is as often

 Jeffrey bring girls to him as muffin as possible as many osto us. Us being you I Virginia. So walk ame through an example go thohouse and then where do you have this discussion where did you have this discussion what words did he use what did he tell you specifically?

A Specifically he just said see if you can find firls. It was in the living room. There's a little desk that is where I normally talk to him. He would sit behind the so you have any nor girls you

1 want to beak in a cupp for nis weekend and like I 2 said pretty much every time I went there if I knew 3 /KPWEBLS I could bring to him I started bring ilto I 4 quessee liked then they would start doing stuff 5 without me so then slowy just fading out, you know. 6 0 Squat this point Jeffrey Epstein in the 7 living room and Virginia to bring other girls? 8 Α Uh-huh. Was he using the world massage anymore? 0 10 Α No, ee did not say anything like that just 11 is saying to bring them. 12 At that stage where this conversation a 0 13 happening dud you already settle conversation and 14 Virginia you knew what was actually at the house as 15 apoid I'ma masagge therapist? 16 I'm not positive but I don't doubt it. Α 17 0 Once you were hin house with Virginia and 18 you were having these conversation with Jeffy 19 Epstein was it obviously to you whata happening that 20 house? 21 I mean it was obvious to me. Like I said Α 22 I never witnesses any of the stuff so... 23 0 Of course? What would you tell the girls that you 24 25 would bring to Jeffrey's what the did you del the

```
1
    Jeffries house to get them to the house.
2.
               Well I told them that it was for a
3
    massage. And I told them obviously that if people
4
    when they get massaged I don't know going to expect
5
    more from you or not. If he does tell him know it's
6
    up to you if you want to go. And they would still
    do it it.
8
               How did you know to use the word massage
    to get the girls to Jeffrey epi/STAOEPBZ house?
10
         Α
               I did not want to straight up be like why
    don't you jerk this guy off for money so...
11
12
               You thought that was a better way to get
         0
13
    them to the house?
14
               Yeah, sounded a little bit more
         Α
15
    professional aquess not as bad.
16
         0
               Okay.
17
               When you brought other girls to the house
18
    aside from Virginia where was elenmax in the house?
19
         Α
               Object form /STKPWHROUPBZ brought other
20
    girls to the house aside from Virginia was
21
    Ms. Maxwell in the house?
22
         Α
               Yes.
23
         0
               Where was Ms. Maxwell in the house when
    you brought other girls to the house aside from
24
    Virginia?
25
```

```
1
               In the kitchen.
         Α
2.
               And on these occasions would you see
         0
3
    Ms. Maxwell in the kitchen?
4
         Α
               Yes.
5
               On these occasion when you would bring
         0
6
    girls other the Virginia to the house and
7
    Ms. Maxwell was in the kitsch would Ms. Maxwell see
8
    the girl you brought to the house?
         Α
               Yes.
10
         Α
               Form foundation.
11
               And when you would brink these girls other
         0
12
    than Virginia to Jeff /AEF epi/STAOEPBZ house I see
13
    Ms. Maxwell in the kitchen were you with the girl
14
    that you just brought?
15
         Α
               Yes.
16
               MS. MENNINGER: /TPOPBL form foun.
17
    BY MR. EDWARDS:
18
               I during these occasion what conversation
19
    if any did Ms. Maxwell have knyefe girls you
20
    brought?
               Not much pretty mump like I said when I
21
         Α
22
    take the girls all it would just a friendly
23
    conversation with everybody and just high what's
24
    your name asking about what they do and where they
25
    are and stuff like that. It was never anything like
```

```
1
    sexual talk or anything like that.
2.
               Okay. So just so have a good image of that
    bring a girl authority when you brought a other than
3
4
    verge into -- what door did you enter Jeffrey
5
    Epstein's house?
6
         Α
               When you pull up to his house a walkway
7
    where higarage is like off to the side that's the
8
    bay I always qo.
               I know the sider door by the kitchen?
         0
10
         Α
               Yeah.
11
               So on one of occasions if you can think to
         0
12
    one of the occasion brought a girl into the kitchen
    other than Virginia?
13
14
               Uh-huh.
         Α
15
               And Ms. Maxwell an in the kitchen, did you
         0
16
    and this /OEURT girl that you were bringing over sit
17
    there and together have this small stalk and
18
    McMaxal?
19
         Α
               Yeah.
20
               MS. MENNINGER: Fom form foundation.
21
         Α
               Yes.
22
               And how long would you and one of these
         0
23
    other girls sit there and have this small talk with
24
    Ms. Maxwell?
25
         Α
               No more than 10 or 15 minutes.
```

1 What were you waiting for? O 2. Pretty much her to take them up stairs Α 3 then I would leave. I would wait for them to be 4 like we're ready. And I would be all right. See you 5 later and I would leave. 6 You were waiting for who to take who up 0 7 stairs? 8 I had seen Ms. Maxwell take a girl up Α there well not up there visibly but I watched her 10 leave had room with one. 11 Up stairs? 12 Well, I didn't see the stairs. Like in Α 13 the kitchen there's not like you have to go all 14 around and all that shit. 15 0 Let me just understand what you did see 16 So you brought a girl over. We're talking 17 about an instance where you brought another girl 18 over to the house? 19 Α Yes. 20 And your in the kitchen with this other girl and Ms. Maxwell? 21 22 Α Yes. 23 0 And what did you actually see in terms of of where did that girl and with whom? 24 25 I just saw them leave the room. Α

1	Q Together?
2	A Together. And assumed that they were
3	heading up to massage room.
4	Q Because that was the purpose of bringing
5	her over?
6	MS. MENNINGER: Objection.
7	A Yeah.
8	MS. MENNINGER: Form founds.
9	BY MR. EDWARDS:
10	Q When during that circumstance?
11	Q So you undderstand the circumstance I'm
12	talking about you bring a girl into the kitchen and
13	Ms. Mackle is in the kitchen?
14	A Uh-huh.
15	Q And you see Ms. Maxwell and this girl
16	leave the kitchen?
17	A Yes.
18	Q When during that circumstances do you get
19	paid?
20	A I gid paid before anything happens period.
21	I walk in the door talk to Jeffrey and then he hands
22	me my money walk back to kitchen say by and leave.
23	And then like I said at some point and seen her
24	before when I was leave walking the girl out the
25	living room out through the kitchen. So she could

1 have taken up stairs she could have not but I 2 definitely seen her walking. 3 On how many occasionings? 4 /KWROPBLT might I told me this but how 5 many occasion did you bring girls into the kitchen and the three of you, you the girl you brought and I 6 7 /STKPWEULian Maxwell have conversation? 8 Not many. I only met her maybe six times. Α Each of the times you met gillian Maxwell 0 10 Jeffrey epi/STAOEPBZ house did you have girls 11 that were being brought to Jeffrey? 12 Α Everything time at the house it was either 13 with Virginia or some girl. I never went there by 14 myself. 15 0 He did not have a use for you? 16 Α Yeah, he did not need me. 17 Q All right. That beginning of the 18 deposition I believe tell me if I got this wrong I 19 believe talk about it time Virginia just gone to 20 thiland talking to you in telephone? 21 Α Uh-huh. 22 And you believe Jeff /AEF was supposed to 0 23 pay the phone bill; is that correct? 24 Yeah. Α 25 Why did you believe Jeffrey Epstein was Q

```
1
    lead to where is she, so...
               How did Jeffrey Epstein have you telephone
2.
         0
3
    number?
4
         Α
               I would imagine from Virginia.
5
               Okay. What prior to her going did he call
         0
6
    you on the telepone?
7
               I mean sometimes he would have his
8
    assistant call thee but he did call me sometimes.
         0
               Which assistant call you of jiffy
10
    sep/STAOEFRPBZ I can't remember her name but his
11
    main asigh?
12
               Would sarah callin cal lyou?
         0
13
         Α
               I believe that's her.
14
               Gillian Maxwell call you?
         0
15
               I think she might have once or twice.
         Α
16
    I'm not positive but I'm pretty sureee did.
17
         Q
               Would the calls that gill wherein Maxwell
18
    made to you been during the time that you were
19
    living with Virginia or after Virginia had left?
2.0
               It was while living together.
         Α
               And what would be what did Virginia what
21
22
    did gillian Maxwell say to you when she called you
23
    while living?
24
         Α
                               Objection miscontact when
25
               MS. MENNINGER:
```

1 watt. 2. Α And what say what did he say? 3 0 Yes. 4 Α Just ask mead had anybody else lined up. 5 Anything else lined up for what? 0 6 Α Objection form /TPOUFRPBLDZ. 7 Α For Jeffrey. 8 Let me fix this. Gill when gillian 0 9 Maxwell would call you during the time that you were 10 living with Virginia she would ask you what 11 specifically? 12 MS. MENNINGER: Fom form foundation. 13 Α Just if I had found any ear girls just to 14 bring the Jeffrey. 15 0 Okay. 16 Pretty much everytime a conversation with Α 17 any of them it was either asking Virginia where she 18 was ask the asking her to get girls or asking me get 19 girls. 20 Let's go to that second categorying you 0 just identified asking Virginia to get girls. How 21 22 many times were you in a room where specifically 23 gill max would ask Virginia to bring girls? Not that I can recall. 24 Α 25 How many times when you say thigh asked Q

1	Q How often would Virginia according to
2	Virginia how much would Virginia and /PH*BGS maxal
3	go out look forg girls?
4	A I stopped asking after a while. I would
5	imagine every time but I don't recall.
6	A Every time when she was telling you or you
7	were asking that's what was happening.
8	A Yeah.
9	Q All right. And going back to when he
10	finally told you that having sex with these people?
11	A Uh-huh.
12	Q It was the people she told you that she
13	was having sex with Jeffp /STAOEPB Ms. Mackual
14	andthol other girls did you understand all the other
15	girls were?
16	A I just assumed justthol girls that heever
17	had at his house I never on a personal basis with
18	pretty much anyone except for the ones I went to
19	school with so
20	Q And?
21	Q Of the girls brought to had us or that you
22	observed Virginia bring to the house how many of
23	them were professional masuesses?
24	A Zero.
25	Q What was the age range of the girls that

```
1
    you start with you that you brought with Jeffy
2
               Object to the form foundation?
    Epstein.
3
         Α
               Well had age-age brought for sure were
4
    around my age. I met them through school people
5
    where knew actually hung out with.
6
         0
               What were the age range of the girls your
7
    observe thad Virginia brought to the house?
8
               MS. MENNINGER: Object to the form
9
          foundation.
10
         Α
               I like I said I never asked them how old
11
    they all seemed like there were younger.
12
               Are you bring you bring 253540 year olds
         0
13
    to the house?
14
         Α
               No.
15
         Q
               So within a range?
16
               I'd say probably 16 to 19.
         Α
17
         Q
               Okay.
18
                                /TPOPBLG /TPORP foundation
               MS. MENNINGER:
19
          sore slipping it in afterwards but...
20
    BY MR. EDWARDS:
21
               Yousaid when you were at the house you saw
22
    naked photos what is the naked photo?
23
         Α
               Pictures of people naked.
24
               Photohad ezpeople that were faked?
         Q
25
               Yeah.
         Α
```

```
1
    /STKRAUP /UPD some a/KAEUZsiobe the inside.
2.
          Α
               Yes.
3
          0
               Hung out the by had pool?
4
          Α
               Yes.
5
               On the /KWEUFPB?
          0
                     And in total of the times you went
6
          Α
               Yes?
7
    if soohad house you saw Ms. Maxwellout gut tall ix.
8
          Α
               Five or six times.
               Total?
          0
10
          Α
               Tote.
11
               Not fix?
          Q
12
               /PAOERLD all together.
          Α
13
               /WROU brought?
          O
14
          Α
               All together period.
15
               I thought you said asking you questions
          0
16
    that Ms. Maxwell ever Jude bring girls?
17
          Α
               I don't remember saying had a.
18
               Tell me when did Ms. Macual ask row to
19
    bring a girl?
20
               Never /EUFRP person like liltally on it
          Α
21
    phone once or twice.
22
               Did Ms. Maxwell call you /TPR-BGSly?
          0
23
          Α
               No.
               How many times do you think Ms. Mackle?
24
          Q
25
               Ever just a few couple times onceoy twice.
          Α
```

1 /PHUPLG ort of /TAOEUFPL pretty much his 0 2 assistant? 3 0 How do you know /PH*GS Maxwell's voice? 4 Α Sounds British. 5 So-so someone British acthe /SHAOEFRPBLG 0 6 told me who she was? 7 And what did see say wheni called you 8 asked you to bring gills? High a gillian Jeffy wandering had anybody Α 10 to could come /STKPWHROEFRB when did that happen. 11 Α I'm not exactty shirr of time /TPRAEUFPL. 12 After the road house grillo /PW-F? 0 13 Probably I would think before I'm pretty Α 14 sure pretty positive. 15 /TPWH-FR /HOED house grill wray? 0 16 After started going back to work with Α 17 Jeffrey /STAUPLD talking to her went back to him I 18 never Todd to Ms. Mackual again after the had to 19 been before that. 20 When /TKPEUD you stop talking to? 21 Α Just /TWAOEPBT there never like she was 22 anything more than a high how are you kind a thing 23 not like when I talked to Jeffy ask me about stuff and hold an information with her just hay hours your 24 25 mom see yeah not anything detail.

```
1
               /HRO*EUTSeredered not like debate that.
          Α
2
               So you waiver reading it if you like all
          Q
    right. Thank you very much for you time?
3
     (Off the record at 1:23 p.m.) order order.
4
5
               MS. MENNINGER: Orderered.
6
    BY MS. MENNINGER:
7
          Q
8
               MR. EDWARDS: Yeah I wand a copy.
    Cology dense said. /EUFPLTS disc
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```