

**COMPOSITE  
EXHIBIT 4  
(Filed Under Seal)**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,  
  
Plaintiff,

v.

GHISLAINE MAXWELL,  
  
Defendant.

\_\_\_\_\_ /

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.  
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company  
B. Paul Katz Professional Center  
(SunTrust Building)  
One Florida Park Drive South  
Suite 214  
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR  
Florida Professional Reporter  
Court Reporter and Notary Public

1 Q I guess my question is: Did she ever tell  
2 you that she had started as a regular masseuse for  
3 him and then transitioned to something other than a  
4 masseuse?

5 A No. She never said that it transitioned.  
6 But she ended up explaining to me what had happened  
7 before, so...

8 Q What has -- what is that?

9 A That her and Ms. Maxwell and Jeffrey would  
10 obviously be doing stuff, all three of them  
11 together. Like I said, that they would all go out  
12 to clubs to pick up girls and try and find them to  
13 bring back for Jeffrey. And then she told me about  
14 how, like I said, her and Ms. Maxwell and Jeffrey  
15 were all intimate together on multiple occasions.

16 Q When did she tell you this?

17 A I'm not exactly sure on the dates.

18 Q Was it while you were still together?

19 A Yes.

20 Q Did you -- had you met Ms. Maxwell?

21 A Yeah, I had met her a couple of times.

22 Q When did you meet Ms. Maxwell?

23 A Dates, I'm unsure of. But it was pretty  
24 much, like I said, at Jeffrey's house in the  
25 kitchen.

1 Q Was it earlier in the time you were with  
2 her, or...

3 A It was about -- I'd say about six months  
4 or so. I don't know. I'm not exactly positive.

5 Q All right. So at the time you met  
6 Ms. Maxwell, had Ms. Roberts already told you that  
7 she had been intimate?

8 A No. She had told me about that, I  
9 believe, after I had max- -- after I had already met  
10 her.

11 Q Okay. And tell me everything that you  
12 remember about what Ms. Roberts said about being  
13 intimate with Ms. Maxwell and Mr. Epstein at the  
14 same time.

15 A I remember her talking about, like,  
16 strap-ons and stuff like that. But, I mean, like I  
17 said, all the details are not really that clear.  
18 But I remember her talking about, like, how they  
19 would always be using and stuff like that.

20 Q She and Ms. Maxwell and Mr Epstein would  
21 used strap-ons?

22 A Uh-huh (affirmative).

23 Q How did you feel about that?

24 A I just -- obviously not happy about it.

25 Q What did you say?

1 A I did not.

2 Q When the FBI interviewed you, did you  
3 mention this to them?

4 A I mentioned -- anything they asked me, I  
5 did not hold anything back.

6 Q Okay. Do you recall specifically talking  
7 about sex with the Prince?

8 A I -- I don't recall talking to them about  
9 that, but, I mean, it's -- it could be possible.

10 Q Other than sex with the Prince, is there  
11 anyone else that Jeffrey wanted Ms. Roberts to have  
12 sex with that she relayed to you?

13 A Mainly, like I said, just Ms. Maxwell and  
14 all the other girls.

15 Q Ms. Maxwell wanted -- Jeffrey wanted  
16 Virginia to have sex with Ms. Maxwell?

17 A And him, yeah.

18 Q And did she tell you whether she had ever  
19 done that?

20 A Yeah. She said that she did.

21 Q And when did she tell you that?

22 A I'm not sure on the date.

23 Q And what did she describe having happened?

24 A I believe I already told you that. With  
25 the strap-ons and dildos and everything.

1 Q Was it one event or more than one event?

2 A I'm positive it was more than one.

3 Q Why do you say that?

4 A Because they were always with each other.

5 Like, any time she would talk to me about them going  
6 to do stuff, it was with her and Ms. Maxwell. Like,  
7 they were always out, like, trying to get girls and  
8 whatnot.

9 Q Okay. Did you ever participate in getting  
10 girls?

11 A Yes. But...

12 Q Tell me what you mean. What did you do?  
13 When you say 'get girls,' what do you mean?

14 A Pretty much I got some of my friends that  
15 I knew, because Virginia was looking for other girls  
16 to go over there, because Jeffrey was giving us \$200  
17 apiece for every one that we brought over. And  
18 I'll -- pretty much I would get friends that I went  
19 to school with, and I would take them over there and  
20 introduce them, and then I would just leave.

21 Q What did you tell them they were going to  
22 do?

23 A A masseuse, like, and then I told them --  
24 I was, like, "Now, listen." I was, like, "I'm  
25 letting you know I don't know what he's going to ask





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1 MS. MENNINGER: Objection. Form.

2 Foundation.

3 A For Jeffrey.

4 BY MR. EDWARDS:

5 Q All right. Let me fix this. Ghislaine --  
6 when Ghislaine Maxwell would call you during the  
7 time that you were living with Virginia, she would  
8 ask you what, specifically?

9 MS. MENNINGER: Objection. Form.

10 Foundation.

11 A Just if I had found any other girls just  
12 to bring to Jeffrey.

13 BY MR. EDWARDS:

14 Q Okay.

15 A Pretty much every time there was a  
16 conversation with any of them, it was either asking  
17 Virginia where she was at, or asking her to get  
18 girls, or asking me to get girls.

19 Q All right. Let's go to that second  
20 category you just identified, which is asking  
21 Virginia to get girls. How many times were you in a  
22 room where specifically Ghislaine Maxwell would ask  
23 Virginia to bring girls?

24 A None that I can recall.

25 Q Okay. How many times -- when you say they

