

EXHIBIT F

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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

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1 Q Do you know her name?

2 A I think it was Carolyn -- Caroline,
3 Carolyn -- I don't know -- something like that.

4 Q Did Jeffrey call you directly about
5 getting more girls?

6 A Yes.

7 Q On the phone?

8 A Uh-huh (affirmative).

9 Q What did he say?

10 A He was just asking me if I had any other
11 girls that wanted to come work.

12 Q Okay. Is that the term that he used?

13 A Yeah.

14 Q And did he pay -- he paid you personally?

15 A Yeah. He handed me \$200 for every girl
16 that I walked in that door, whether they did stuff
17 with him or not.

18 Q In cash?

19 A Cash.

20 Q Did you ever get paid by Ms. Maxwell for
21 that?

22 A No.

23 Q Did you ever bring a girl to Ms. Maxwell?

24 A No.

25 Q Did Ms. Maxwell ever call you and ask you

1 to bring a girl to her?

2 A No.

3 Q Did Ms. Maxwell ever call you and ask you
4 to bring a girl to Jeffrey?

5 A No.

6 Q All right. Approximately what period of
7 time were you doing this bringing of girls?

8 A I'd say probably, like, about six months
9 before she left. Because mainly, like I said, I
10 mean, she would get them with Ms. Maxwell or whoever
11 else. And whenever we were around, like I said, I
12 would find friends that I went to school with or
13 whatever that were willing to go there, so...

14 Q I'm sorry. What did you start that
15 sentence with? She would get them from Ms. Maxwell?

16 A No. Her and Ms. Maxwell would go get them
17 for him.

18 Q Did you see Virginia with Ms. Maxwell
19 at --

20 A I had never. Like I said, aside from
21 going to the mansion, I had never went out with them
22 anywhere. I've never been out to clubbing with
23 them. I've never been to New York or anything. I
24 never went on any trips with them. So anything that
25 happened, I was not there for, so...

1 happen, so...

2 Q Well, you said you observed bringing a
3 girl over.

4 A No. I'm just saying -- like, I brought
5 them over, yes. But I have never observed anything,
6 like, sexual. Never anything --

7 Q Okay.

8 A -- like to where it would be an illegal
9 activity. Like, any time I was there, everybody was
10 dressed. They were all talking like it was just,
11 like, people hanging out in a room, you know what I
12 mean? There was never anything going on when I was
13 there, so...

14 Q Do you have any personal knowledge as to
15 whether anything other than a massage took place
16 between Jeffrey and these girls?

17 MR. EDWARDS: Form.

18 A No.

19 BY MS. MENNINGER:

20 Q You did not see anything?

21 A Nope.

22 Q They didn't tell you afterwards anything
23 happened?

24 A Nope. Like I said, the only people
25 with -- some would ask to go back; some wouldn't.

1 Q Right?

2 A Yes.

3 Q But you did not observe that?

4 A No.

5 Q Ms. Roberts described sexual acts that she
6 participated in with Jeffrey; correct?

7 A Yes.

8 Q And you did not observe that?

9 A No.

10 Q Ms. Roberts described sexual acts she
11 participated in with Ms. Maxwell; correct?

12 A Yes.

13 Q You did not observe that?

14 A No.

15 Q When you saw Ms. Roberts and Ms. Maxwell
16 in the same room, was there anything sexual going on
17 between them?

18 A No.

19 Q How much money did you see Ms. Roberts
20 possessing at any given time?

21 A I mean, it could of -- up to a couple
22 thousand at a time to, like, just a few hundreds at
23 a time. I mean, it was never like, overly amounts.
24 Like, not like \$10,000, \$20,000, nothing like that.
25 But, I mean, it was every time she would come back,

1 Q It pays better than the vet office?

2 A Yeah.

3 MR. EDWARDS: Object to the form.

4 BY MS. MENNINGER:

5 Q The information about other girls going
6 back to Jeffrey without you was information you
7 heard thirdhand --

8 A Yes.

9 Q -- correct?

10 Did you have conversations with these
11 girls about their ages?

12 A The ones that I took?

13 Q The two, [REDACTED] and Carolyn.

14 A No. They were my age. That's what I'm
15 saying, they were literally at -- at most, like, a
16 year younger than me.

17 Q The girls that you were in the car when
18 Virginia took --

19 A Those, I did not even ask.

20 Q You did not ask?

21 A No.

22 Q Did you hear her discussing anything about
23 age with them?

24 A No.

25 Q Did you hear them discussing you have to