

# **EXHIBIT H**

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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.

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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 You didn't know her to work at any retail  
2 places?

3 A Not that I'm aware of.

4 Q Do you recall her working as a waitress?

5 A I believe so, yes.

6 Q When was that?

7 A I don't know the exact date.

8 Q Was it while you-all were dating?

9 A I'm pretty -- it might have been, yes.

10 Q Did you ever go to her restaurant?

11 A No. I did not have a car.

12 Q Did Ms. Roberts have a car?

13 A She did, yeah.

14 Q What kind of car did she have?

15 A It was a -- I'm pretty sure it was a  
16 white -- a white Pontiac, I think it was, at first.

17 Q Like a '93?

18 A Yeah, I think so. And then she ended up  
19 buying a truck.

20 Q When did she buy the truck?

21 A It was a little bit before she left, but  
22 not too long.

23 Q What kind of truck?

24 A It was a Dodge Dakota extended cab.

25 Q Do you know what happened to that when she

1 did not come back from Thailand?

2 A Yeah. I ended up getting in some trouble  
3 with it, and I got it impounded. And her dad got  
4 it, I guess, because I obviously couldn't.

5 Q What kind of trouble did you get into with  
6 that truck?

7 A I ended up getting arrested for grand  
8 theft. I ended up taking a bunch of Xanax and  
9 stealing a bunch of stuff on the way back from  
10 dropping her off at the airport to go to Thailand.

11 Q In that -- in that --

12 A In that truck, yes.

13 Q Okay. How was that case resolved?

14 A I ended up getting charged with a felony.  
15 And, I mean, I got my rights back, like, last year,  
16 so...

17 Q Great.

18 Did you have to serve any time?

19 A I did. I went to jail for -- I'm not  
20 exactly sure. But then I was on probation for a  
21 long time, so...

22 Q And that all stemmed from an incident  
23 where you were driving Ms. Roberts' truck?

24 A That was the exact -- when I was dropping  
25 her off at Thailand -- or to the airport to go to

1 Thailand -- in Miami. And it was literally that  
2 night. I made it back to West Palm and then got  
3 caught in West Palm and woke up in jail.

4 Q Was that truck in her name?

5 A That, I'm not sure.

6 Q Were you with her when she got the truck?

7 A Together as in her boyfriend? Or with her  
8 when she bought it?

9 Q With her when she bought it.

10 A No.

11 Q You were her boyfriend?

12 A Yeah, I was. But I was not there when she  
13 got the truck. I mean, I don't even know when it  
14 was, but I know she bought it, though.

15 Q Was it new or used?

16 A No, it was not new. I believe it was a  
17 few years old. I'm not positive. But it was a  
18 while ago, so, I mean, that kind of an old truck  
19 is -- I mean, I'm not sure exactly if it was new  
20 then or not, you know.

21 Q Got it.

22 At the time she left for Thailand, she had  
23 the Dodge Dakota, and you did not have a vehicle?

24 A Yeah.

25 Q Before the Dodge Dakota, she was driving a

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

1       you to do. But, you know, he obviously has money  
2       willing to pay for stuff. So whatever happens, I  
3       don't." You know, I don't know. I've never been up  
4       there. I've never seen what happens up there.

5                You know, I -- you know. But as far as I  
6       told them, it was just a masseuse job.

7                But any time someone: Oh, you're going to  
8       be a masseuse, like, they always jump to the  
9       conclusion, you know, happy endings, blah, blah,  
10      blah, blah, you know, so...

11           Q     You never had any direct conversations  
12      with these girls?

13           A     No. I never asked them what had happened,  
14      ever.

15           Q     What are the names of some of these girls  
16      that you remember?

17           A     I remember taking [REDACTED]  
18      [phonetic]. And I know she ended up bringing some  
19      other girls, also.

20                But we met this other girl -- well, it was  
21      actually her boyfriend we met. I met him -- I think  
22      it was at Gold Coast or South Area. It was one of  
23      those schools that I met him at. And his girlfriend  
24      ended up working for him, also. And I think she got  
25      more girls for him, as well.

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 Q What drugs had you seen Ms. Roberts use?

2 MR. EDWARDS: Object to the form.

3 A Weed, coke, bars, Xanax -- which are bars,  
4 obviously. I mean, that's mainly what we were  
5 doing. I mean, we tripped a couple of times.

6 BY MS. MENNINGER:

7 Q Tripped on what?

8 A Acid.

9 Q Was there ecstasy?

10 A I mean, honestly, I really was not too big  
11 into ecstasy. But back then, I mean, a lot of the  
12 nights could have been with some, and just I don't  
13 remember. I mean, that's a good possibility. I  
14 used to get pretty messed up myself, so...

15 Q How frequently did you see Ms. Roberts  
16 using cocaine?

17 A Not very --

18 MR. EDWARDS: Object to the form.

19 A -- often at all, actually.

20 BY MS. MENNINGER:

21 Q How often did you see her using weed?

22 A That -- that, we did, like, daily.

23 Q What money was used to purchase the weed,  
24 if you know?

25 A I pretty much bought that myself. Like, I

1 always smoked weed, and I always had my own, so...

2 Q And where did you get your money at that  
3 time?

4 A What's that?

5 Q Where were you getting your money at that  
6 time?

7 A I was actually working at Denny's at the  
8 time before she started -- before I met her. I was  
9 a cook.

10 Q After you met her, did you stop working at  
11 Denny's?

12 A Yeah, I did stop working there. But then  
13 I ended up getting a job at Dunkin' Donuts  
14 eventually, and just bouncing around from different  
15 places and...

16 Q Were you living off of her money?

17 A Somewhat, yes.

18 Q She was paying the rent?

19 A Uh-huh (affirmative).

20 Q Yes or no?

21 A Yes. Sorry.

22 Q You made your own purchases of weed?

23 A Uh-huh (affirmative).

24 Q You --

25 A Yeah. My neighbor actually across the

1 street from me, he used to -- he was my guy I got my  
2 weed from. So he would just always, "Here you go."

3 Q How often did you see Ms. Roberts taking  
4 Xanax?

5 A Not very often. And then -- I mean, but  
6 the thing about Xanax is, like, you don't remember  
7 much. So whenever it was, obviously, I was taking  
8 it, too. So I couldn't exactly recall the amounts  
9 of times, you know.

10 Q So the two of you took Xanax together?

11 A Yeah.

12 Q And your experience is that when you were  
13 taking Xanax, you can't remember things that well?

14 A Yeah.

15 Q Did you ever observe her taking up to  
16 eight Xanax per day?

17 A That, I'm not exactly sure on the number,  
18 so I don't know.

19 Q Did you observe her under the influence of  
20 any drugs?

21 A Yeah. Like I said, whenever we took them  
22 together. When she was off doing her own thing with  
23 them, I have no clue what they were doing.

24 Q Do you know whether Jeffrey wanted her to  
25 use drugs or did not want her to use drugs, or

1 anything about it?

2 A I don't know. I know he didn't do  
3 anything. But I don't know what he told her not to  
4 do or do, so...

5 Q Did you have any concerns, since she had  
6 been in a rehabilitation program, before about her  
7 drug use?

8 A No. Because as I stated before, I was not  
9 exactly a standup guy back then either. So I was  
10 not really the best person to get advice from. You  
11 know, I was kind of doing the same stuff and getting  
12 in trouble. So I was not really trying to tell  
13 people how to live their life, you know?

14 Q Is it fair to say you were both partying  
15 together?

16 A Yes.

17 Q You had parties at your apartment?

18 A Yeah.

19 Q People came over?

20 A Yeah.

21 Q You bought and supplied drugs for those  
22 people?

23 A Yeah.

24 Q They came over to your house specifically  
25 to party?

1 MR. EDWARDS: Object to the form.

2 A Um, no. Because they were my friends. I  
3 mean, they would hang out just to play video games,  
4 you know. It was just sometimes it got wild,  
5 sometimes it didn't. You know, sometimes we were  
6 all just chilling, smoking; sometimes we weren't.  
7 You know, it's just, like, it just all depended on  
8 who was there and what was going on at the time. It  
9 was not like we always had random people just  
10 showing up at the apartment. It was always pretty  
11 much, like, the same group of people that would come  
12 over.

13 Because that guy Anthony, he actually was  
14 staying in the apartment across from us with, I  
15 believe -- I can't remember these two brothers'  
16 names. But there was them over there, and then  
17 there was -- damn, I can't remember their names.  
18 But there was two brothers that lived there. Them  
19 two, Anthony, my friend Mario. Like, it was just  
20 pretty much the same people that always would just  
21 come over and just, you know, hang out and chill.  
22 My friend Wes.

23 Q Anthony was living in an apartment in the  
24 same complex?

25 A Yeah.