

EXHIBIT JJ

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CONFIDENTIAL/SEALED DEPOSITION
SPECIAL TREATMENT REQUIRED

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February 10, 2016

VIA E-MAIL & FEDERAL EXPRESS

Esquire Solutions
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**Re: Confidential/Sealed Deposition Transcript, Job No. J02777789
(Errata changes to be treated in same manner).**

To Whom It May Concern:

Attached please find the errata changes for the Videotaped Deposition of Virginia Roberts Giuffre taken January 16, 2016. This transcript has been designated as Confidential and has been sealed by the Court. Please ensure that all materials including transcript, errata changes and video tape are treated accordingly.

If you have any questions regarding the errata changes or treatment of confidential/sealed materials, please do not hesitate to contact me at (954) 356-0011.

Sincerely,



Sigrid S. McCawley

SSM:sp
Enclosures

Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789

215

1 DEPOSITION ERRATA SHEET

2

3 Assignment no: J0277789

4 Bradley J. Edwards and Paul G. Cassell

5 vs.

6 Alan M. Dershowitz

7

8 DECLARATION UNDER PENALTY OF PERJURY

9

10 I declare under penalty of perjury that I
11 have read the entire transcript of my videotaped
12 deposition taken in the captioned matter or the same has
13 been read to me, and the same is true and accurate, save
14 and except, for changes and/or corrections, if any, as
15 indicated by me on the DEPOSITION ERRATA SHEET hereof,
16 with the understanding that I offer these changes as if
17 still under oath.

18

19 signed on the 11 day of February
20 2016.

21

22

23

24

25


VIRGINIA ROBERTS GIUFFRE

**Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789**

DEPOSITION ERRATA SHEET

Page No. 6 Line No. 17

Change to: "Yes. I signed the subpoena duces tecum."

Reason for change: Did not initially recognize the document

Page No. 6 Line No. 20

Change to: "No. My lawyers worked with me to collect documents and my understanding is that we turned those documents over to Dershowitz's counsel prior to the deposition."

Reason for change: Clarification of answer

Page No. 9 Line No. 9

Change to: "Yes."

Reason for change: Did not initially recognize the document

Page No. 11 Line No. 1

Change to: "Yes."

Reason for change: Misunderstood the question

Page 11 Line Nos. 4-5

Change to: "I'm confused. I don't know what foreign president you're talking about."

Reason for change: Misunderstood the question

Page No. 11 Line No. 23

Change to: "I understand well-known prime ministers and other world leaders; as far as foreign presidents, I believe so."

Reason for change: Misunderstood the question

Page No. 12 Line No. 2

Change to: "Yes, assuming South America is considered overseas."

Reason for change: Misunderstood the question

Page No. 12 Line No. 8

Change to: "As far as I know right now, yes, I was."

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Reason for change: Misunderstood the question

Page No. 38 Line No. 11

Change to: "I'll continue with the list here. Nadia Marcinkova I was not sent to her, but she was part of it with Jeff Epstein. Others on the list include Marvin Minsky and Tom Pritzker."

Reason for change: Clarification of answer

Page 38 Line 19

Change to: "Off the top of my head, once, but it could have been more."

Reason for change: Clarification of answer

Page No. 38 Line No. 21

Change to: "I believe Tom was at Mexico. I may have also been with him in other places."

Reason for change: Clarification of answer

Page No. 41 Line No. 8

Change to: "On an airplane and in a limo."

Reason for change: Clarification of answer

Page No. 41 Line No. 10

Change to: "One, each time."

Reason for change: Clarification of answer

Page No. 41 Line No. 12

Change to: "On airplane, blond, young."

Reason for change: Clarification of answer

Page No. 98 Line No. 16

Change to: "As you can see in that answer I'm not even sure. It wasn't six months, but between six months and a year which is why I'm saying nine months. It was an assumption. It could have been six weeks."

Reason for change: Clarification of answer

**Confidential/Sealed Transcript Pursuant to Court Order
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Job No. J0277789**

Page No. 190 Line No. 22

Change to: "No, other than maybe you showing it to me today. It's in my pile. It's not in my pile, is it? I don't know. I haven't seen it. I was served with the subpoena, and I signed for it, and I reviewed it at that time."

Reason for change: Clarification of answer

Page 191 Line 5

Change to: "Why would I do – no. I did collect documents and gave them to my lawyers in response to this subpoena. And my understanding is those documents were produced."

Reason for change: Misunderstood the question

Page 191 Line 20

Change to: "Yes, but I did not have any pictures of myself with Professor Dershowitz."

Reason for change: Misunderstood the question

EXHIBIT KK

The Billionaire's Playboy Club

By Virginia Roberts

To my true love Robbie who believes in me every step of the way and to all of my children, you are all my very inspirations!

Chapter 1

Every single person in this shared world together has a unique story of his or her own to tell, this one is mine. It was coming up to my third night camping out at Miami Beach in the summer of 1997. I was thirteen years old and hiding from a world full of hurt. Sitting on the shoreline for hours watching the sunset fall deeper into the horizon, my eyes were glazed over with tears, not from being wind-whipped by the rough sea breeze, but from reflecting on the abuse I encountered as a young girl and how everyone in my life who was supposed to be there for me had now turned their backs on me in abandonment. My fears crept up and the excitement of escaping all of them faded now realizing how alone I really was now, and for the hunger that was painning my belly. At this point, with nowhere to go and only time to waste, I wiped the tears from my eyes and set out to find an empathetic person that I could manage to get dinner money from. If not, it wouldn't have been the first time I had gone hungry for the night. I walked to the nearest bus stop and asked a handful of people for any spare change, none of whom that could help me. Sitting down on a nearby curb disappointed in grief of my current state, I put my head into my knees and began to sob.

Out of nowhere, it seemed, a black stretch limousine turned the corner and stopped in front of the curb where I had been hopelessly lost. The back door opened to reveal a heavy weight and balding, old man with a big cheesy smile. Neatly dressed in black trousers and a collared shirt, he was sitting next to a striking young, blonde girl, drop dead beautiful and dressed in a foxy red mini dress she looked like a model just stepping off a runway.

Their smiles greeted me warmly and he kindly asked, "What is such a sweet little girl like you doing sitting alone on the street looking so upset?" Shocked from this strangers concern I was hesitant in telling him the truth. Reluctantly I decided to tell him that I was a runaway, not from around here and really hungry. Hoping at most, I would get some money for food from him. He instantly displayed a chilling excitement and offered me to come into his car so we could talk some more. That

should've been my first queue to get out of there quick but with no where to go, and so naive I didn't realize how much worse it could get. Setting foot into that limo, I made my first entrance into a world that would entrap me for many years to come.

He introduced himself immediately as Ron Eppinger, a businessman and owner of a successful modeling agency, called "Perfect 10". Flaunting his oozing wealth by introducing one of his many girlfriends, the beauty next to him was Yana, a supposed model from the Czech Republic who looked like she could be in her early twenties with the heavy load of makeup she was wearing, but really was only in a thick teens. She kissed me on both cheeks and politely said "Hello" in a thick Czech accent, making me feel a little more at ease. Convinced it couldn't be that bad there was another girl in the car, right? I couldn't be more wrong.

What he didn't tell me to begin with was that his modeling agency was only posing for an undercover trade. By the time I found out I thought it was too late to run. His business was really an illegal immigrant trafficking ring of young women mostly consisting of underage girls that he was using as escorts to make him uber rich. Only available to a selective clientele costing them anywhere from \$1000.00 and over per hour of erotic entertainment, the girls were trained to fulfill every sexual desire asked of them, no matter how bizarre the requests might be. The high paid escorts, for Ron's super rich clientele, such as Yana and many other charismatic beauties would only benefit a fraction of their earnings for themselves, Ron reaping in the majority of the financial rewards and being they were all illegal immigrants they were further trapped by his enslavement.

I proceeded to introduce myself, besides what he had found out about me on the curbside. Telling him my name and a little about how I ended up on the streets explaining that I could take care of myself and didn't need my family or anyone to look after me anymore. Looking back later in life I can now admit I was in a terrible state, but being such a headstrong teenager, I refused to give in. He asked my age and I told him I was sixteen at first. He coyly replied, "Are you sure? I think you could be telling me a fib? How old are you... really? I won't be mad" Being a terrible liar, I knew had been caught out and couldn't deny it any further. I told him the truth and he chuckled then paused and answered in a very serious tone "As long as you never lie to me again I will take you in" Right away I pondered to myself what did he mean...take me in?

He gave the driver the location of our destination and rolled the middle window back up to then tell me a story of how his daughter had passed away seven years ago from a horrific car accident in which four other teens were killed and he has never gotten over it. I reacted with sheer

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of life was just mind blowing to even comprehend at first. With such a new outlook of the world to try and grasp at my young age I was listening to every word spoken to me with such attentiveness, I was going to try and model what I was observing from the girls. I justified their way of thinking in my head for now, thinking if all these girls seem happy enough, why couldn't I try to be, it was this or the streets for me.

Ron came back for me not long after our conversation got out of hand and took me to a bathroom down the hall. He opened the tap and filled a small plastic cup with water and handed me two small blue oval pills. Telling me to take them both as they would help me to relax a little bit more. I swallowed the pills just following his orders. I put the cup on the counter top and turned back around to face him. Backing me up against the wall and now cornered by this large man I felt his slithering hands began to creep under my shirt, writhing my skin. I closed my eyes tightly and turned my head away from him, hoping he would take my actions as a sign of being extremely uncomfortable but that wouldn't bother him at all. He was half enjoying my reaction from the smug look on his face, and persisted through it.

Continuing to undress my clothes he said he wanted to look me over and clean me up. It was so humiliating having to expose myself to this ageing man and now I knew he was going to end up with his hands and whatever else all over me. All too soon I hated to be right, as I stood naked before his widened eyes, he told me "you're a hairy bugger I'll have to shave you right up young lady", and I didn't know he wasn't just talking about my legs. Standing with my legs wide apart while this man coaxed me through the entire ordeal of shaving, his hands made me feel so dirty. "Have I lost my mind?" I thought to myself but I had to play nice until I had an opportunity to get away, this was not as fun as the girls made it out to be after all, this was utterly disgusting. I had no idea what was going to happen next with this guy, and due to whatever pharmaceuticals he gave me, I still don't know to this day.

Waking up the next morning my head was pounding in an agonizing thumping pain and I was so thirsty. The satin sheets thankfully covered my body, which was still nude from the night before, and I could hear hushed voices standing over the bed where I was pretending to still be asleep. Listening in on their conversation I kept my eyes shut. I knew Ron's voice from two of the men but not recognizing the other guys I just stayed quiet hoping they'd soon leave. Ron was telling the other man what atrocities he got up to the night before with me and I heard him say, "Doesn't she even look like an angel the way she sleeps? She's my own little angel!" He exclaimed proudly. I opened my eyes and rolled over to face them both having to wrap the sheets over my body, really not knowing what to say except "Good-morning" in a blushtful tone. Ron

introduced me to his business partner and told to go get dressed. He had my whole day planned out for me already. Booked into get my hair colored, a much lighter tint of blonde, and afterwards a day of shopping with the girls I was becoming exactly what he wanted me too, a carbon copy of the teenage Barbie... only I wasn't plastic and came with many benefits.

Days turned into weeks, being a servant to the sexual desires of this distorted pervert. I dreamt of escaping but where would I go and how would I get away from Ron with him controlling my every second of my day. Separating myself from the other girls being so uncomfortable with enduring the everyday occurrences I was longing for the solitude of the beach again. They were training me up to be an escort prodigy or something like it. Outrageous orgies were conducted as my lessons with the girls teaching me all of their tricks in the game, it was all for the sake of men's perverted fantasies, they didn't get anything from being sexually exploited and molesting each other, except getting paid for it. Everything from oral sex too penetration with toys, I was expected to not only to join in but even perform ludicrous acts of hedonism.

I was Thirteen years old and had never heard the terminology of these sexual acts before, and definitely shouldn't have been learning them first hand. Thrown into a world of chaos, I didn't know what to do except be as compliant as possible, even when asked to do the most degrading tasks. The excitement of the lifestyle he offered quickly diminished once I had to pay so dearly for it. The girls that subdued to this lifestyle and enjoyed it definitely put on a good act, but no little girl with hopes and dreams of their untainted future, turns to her mother and say's "one day I dream of being a prostitute, passed around from man to man, only to grow older regretting so much of my life" It was all a part of an illusion that Ron painted for us that made it seem so alluring in the first place.

Spending my days with Ron, he took advantage at every chance given. Even in his convertible with the top down I would be forced to go topless while he drove around, when I asked him why one day, it was supposedly so I could maintain an even suntan, but I knew it was his way of showing off his treasures. It was a far cry from the simple country life I had been raised in. Wearing designer miniskirts and tops that always revealed too much, of course due to Ron and the girls determining everything I wore, ate, or spoke. We would spend our days at hair laser clinics, shopping, tanning beds, and eating as little as possible. Through the nights we were expected to become party animals and greet Ron's clientele with the upmost flirtatious attention and doting as possible. Then whether we were out for dinner, at a party, or at a club, the men would choose his girl and take her home. Every girl had a different price and so did the charges depending on the various clientele but Ron always kept me for himself.

sympathy and gave him my pity, believing this man had a heart. His next proposal was eerie, he said, "If you wanted, I can be your new Daddy. Someone to take care of you and you'll be my new baby forever" he stroked my hair such as a caring parent would comfort a scared child. A part of me wanted to accept his words and believe he really could feel that way, and then I also considered how hard it was living on the streets. In the end I convinced myself this would be the lesser of two evils.

The car stopped at a plaza on the water, surrounded by little boutique shops, restaurants, and little stalls with items for sale like sunglasses and costume jewelry. I didn't know what to say or do or how to act, it all happened so fast I just went along with everything he said, for now.

We went to a take out restaurant and ate on the waterside, and afterwards he took me to G.A.P Kids co. to dress me in his idea of proper attire, tiny cutoff shorts revealing the cusp of my buttocks and some shirts that barely fit, even the sales assistant was shocked at what she thought was my Grandfathers choice in clothing. I couldn't even believe it myself only an hour ago I was begging for money living on the streets and now I was dining alfresco and shopping at name brand outlets. We then hit a couple of more specialty stores afterwards. He said he had to buy me a few more necessities to start with. Lacy G-strings and what looked to me like lingerie pieces I had only seen grown women wearing in magazine ad's or movies was now a part of my wardrobe, in my mind it was a big step up from being a little girl any longer.

The driver took us back to Ron's grand apartment overlooking the isle of Key Biscayne and a large bridge leading into a Miami Harbor. Entering his residence, I was blown away by the spectacular view, rich décor, and white marble floors that were so glossy it looked as if I was stepping on glass. He took my shopping bags to a large room at the back of the apartment and put them into a small closet. The room was considerably large with glass exterior walls that maximized the potential of the panorama landscape soaking in the seascape of Miami. In the room was a gigantic round bed raised off the floor by three steps and mirrors on the ceiling. It looked like a honeymoon suite out of a raunchy hotel. He then exclaimed, "This is my room here and you will be sharing it with me" When I asked him where I would sleep he then sickly replied "With me silly, where else of course?" With no room for argument I pretended to be O.K with everything that my common sense was screaming out in my head to run.

Next I was taken down a long hall at the other end of the apartment to meet five more exotic beauties. Three girls were in their late teens and the other two in were in their early twenties. All of them were from the Czech, here under false passports provided by Ron and his contacts. Yana held my hand while introducing me to the group of girls as "Baby" a pet

name she came up with for me, being I was the youngest one among them or ever to be brought in by Ron for that matter. It became my new identity not even worrying to mention my real name to anyone anymore. My identity was no longer important to myself, I wanted to become someone new and "Baby" is who I was.

A shocking first impression, the girls were completely nude revealing their voluptuous young bodies with such a carelessness and others were in just a G-string, similar to the one's Ron had bought me earlier. They were all stunning girls and full of life. Charismatic and beautiful, they were the girls who should be on the front of billboards not selling their bodies to old crewed men for sex. Doing each other's make-up in front of the mirror and chatting away on the bed with no care in the world, aiming at persuading me to see the highlights of the life Ron gave them and they almost did. Ron left the room for a few moments, letting us all get to know each other a little better and that's when I started to compile an understanding of what really went on here.

Just catching a bit of their conversation from before my introduction, I heard them chatting about the night they were preparing for. Speaking excitedly about some men they would be entertaining in a few hours, one girl was talking about going out to sea with one of these clients on a yacht for a few days. Since none of the girls seemed shy to talk about their professions or anything for that matter, I decided to ask them a few questions about what they did. They were more than happy to expand on their point of view in the conversation, attempting to paint a pretty picture of what they were paid to do.

They all began to jump up and down with excitement like giddy school girls at a slumber party. Another girl with jet-black hair and a thick accent, wearing absolutely nothing at all, grabbed me onto the bed with them and into their fiasco, instantly making me feel accepted into their sorority, like I actually belonged somewhere for once. Yana went on to explain a little more in detail, "We accompany the wealthy friends of Ron. They want only beautiful girls by their side so we come and act however they want us too but most importantly we make them think we want them back too." Other girls began to jump in with their vivid points of view while playing with my hair, they were taking turns brushing and styling it as they were filling my head with all of the prospects I could have as an escort too. They made me feel beautiful like them, too beautiful for what a girl beyond my years should feel. I was simply being lured into a dangerous trap, just like they had been at a young age too.

It pretty much all came down to two things in their game, the money they would make and the lifestyle they were given. Their enthusiasm only interested me further, making it not only sound like an acceptable way of living but also appearing to keep them all vivaciously satisfied. This way

I would always dread the end of every night, fearing what new desires he had in-store for the evening. Sometimes he would hurt me and tell me to try and enjoy it then do it over and over again until I gave him exactly what he wanted. I always resisted until I could no more, he was too overpowering and relentless at getting the results he wanted. At other times he could be so gentle and caress my skin, worshipping every inch of my body, all relying upon on what mood he was in. Often though he liked to play the teacher role and instruct me on every motion and explain what would happen when I did those certain things to him. No matter what he did to me I was only disgusted with myself more and more. I still shudder at the thought of how he used my body.

I turned fourteen in August that same year and was spending my birthday loaded on a concoction of pharmaceuticals and alcohol, being generously supplied by the very man who swore his devotion to caring for my every need. I didn't even know myself any longer, completely shying away from the girl I had grown up to be until to this point. The apartment was empty except for me, for the time being, and that was God's own little present for me...some solitude for once I thought. Pouring myself another drink I opened the sliding glass doors to the balcony and walked to the edge. Looking down from the many stories where Ron's apartment was, I wished myself a happy birthday out loud and wondered if my family even remembered the day's occurrence.

Dwelling in my sadness for the fourteen years of suffering and loneliness I had already endured, the tears swelled up in my eyes, trickling downwards making my eyeliner inevitably leak down my cheeks. Inside I felt so trapped and began to entertain the thought of jumping over the edge, it all seemed much easier, and the simple blackness that death had to offer rather than the tangled mess I was so tired of fighting to get out of seemed a much easier approach. Detached from wanting to feel anything, I became so numb towards my life's own tragedies. I couldn't live like this any longer. I lifted my bare legs over the edge of the railing and sat looking at the ground beneath me so close to even just slipping off the edge to my very death. I couldn't think of any reason not to fall. I thought I had made too many bad decisions to keep going on but some force of a higher nature had other things in store for me.

The sliding door slammed open with a burst of speed and Ron scooped me up in his big arms and brought me inside to our bedroom. Laying me down and seeing the look of despair in my eyes from my tear stained face he went into the bathroom cupboard and returned with three pink pills. Forcing me to swallow them using the angered tone of his voice he thought he was turning my sorrows into a distant dream as I passed out in

his tight clutches, crying myself all the way to sleep. He didn't even ask me what was wrong, probably because he knew already.

Soon enough the crumbling of his evil empire in the underworld of selling sex for his own advantage began with a single crack in his perfect scheme, and proudly it all started with me. Ron got a scare one-day and rampaged through his apartment telling us girls to only pack our important belongings and some clothes as we all had to leave right away. I didn't have much belonging to me so I basically sat there watching everyone rush around frantically and was curious what could've gotten a man like Ron so scared. Once we were packed up and in the limo he was trying to calm the frantic girls down after all the panic that spread through the apartment like wildfire, I was the only one sitting there half amused at the entire situation.

He began by assuring us that everything was going to be fine. Calmly he continued to tell all of us packed in tightly, even for a limo, that we were all taking a long trip to Florida's countryside because someone has reported an anonymous tip to the missing persons unit at the local police station identifying a very young girl as a possible victim of abuse living at his apartment. Ron knew what a landmine of trouble he had brought upon himself making an exhibition out of me on the streets of Miami, I didn't pull off the older look like the other girls, I actually looked younger than my age with my blue eyes and freckles always giving the impression of my youthful innocence.

Now he just had to do whatever it took to ensure he stayed as far away from the authorities as possible. Arriving at a ranch in central Florida many hours later and I assumed it belonged to Ron knowing never to ask him things like that. I knew my purpose and it wasn't prying into his personal life outside of the bedroom. There was a main house, a few cottages, some staff quarters and paddocks where the horses were kept. I was in heaven...I thought at first. Finally, something I could really enjoy. Riding was my passion, basically growing up on the backs of horses since I was just able to walk.

Not surprisingly I began to despise Ron and all of the girls for the gross exploits they made me do with them. Beginning to isolate myself from everyone I'd rather spend my time sitting under a tree watching the horses graze, writing in my journal or painting but mostly avoiding everyone possible unless Ron required me elsewhere. Nighttime was always a reoccurring nightmare for me. Relieved over and over again in many various ways. Ron would always start by making me some drinks and offering an assortment of pills before indulging himself by grotesquely putting his genitals in my mouth and tell me how to give him what he would call a "first-class blow-job", and I was being judged every minute of it. Ordering me to slowdown or speedup or maintain a perfect

rhythm I was constantly being criticized for my efforts in pleasing him. I was eager when he actually gave me a compliment. The rest of the evening was always a surprise left up to a moments notice. Quite regularly he would proceed with having the girls dress me up in some sexy outfit and loads of makeup then entertain him with a lesbian reenactment revolving him in the center. Sometimes they would use dildos and other foreign sex toys, Ron liked to see us hurt during sex, sometimes even penetrating me anally but I always resisted and would try to redirect him with another sexual desire of his but I had no excuses when it came to me having to use the sex toys on him, he told me how men have g-spots in their rectum and instructed me on how to precisely penetrate him. These nights went on what seemed like an eternal sentence for the price of not living on the streets, where unfortunately for the one's still there, I feared and knew from my own personal experience, could be much worse.

Needing some contact with someone of my adolescent mentality I called one of my school friends from the past, whom I wont name out of privacy, but I'll call him T.J. We were so close and I knew very well, so well, I had memorized his number a long time before. He was my first puppy love sprung from of a childhood friendship. Being my very first crush the summer before all of this happened he was the only person I could think of that would care enough to talk to me.

In the middle of the day, the least busy time to be noticed, I snuck into one of the vacant guest rooms and used the phone to call my good friend. The sound of my voice radiated a chill in him. "It's you, oh my God Jenna! Are you okay?" he was so shocked to hear from me and the sheer fact I was still alive. Nearly three months now without a single word to my family or friends, every one doubted my return. My attempt to forge a happy voice when I spoke to him failed and I absolutely crumbled when he was at a loss for kind words for me. I told him of my current state of affairs. Telling him of Ron and how I was terrified of him, trying to escape in the middle of nowhere was useless. It was like being kept in a cage that I was unable to break free from. Going on to dump my issues on T.J. I proceeded with how I longed to call my family and to be with my them for good but was too afraid they didn't want me, knowing I'd just be sent away somewhere else again and to me after all this time was like going from one cage to another.

He had been called by them numerous and promised me that they were very worried and even hired private investigators to try and find me. Given I was eleven years old the first time I was sent away, my trust in there sincerity he spoke about was seriously doubted. I kept the conversation short just in case my absence was being noticed and I left on the note that I would speak to him again shortly. His attempts to get off

the phone were nothing short of desperate plea to keep me on as long as possible. I thought he was just trying to help in some way. Giving him assurance in the fact I had survived this long obviously I can hold off a while longer I gave him my love and told him I'd be in touch.

Thinking I had slipped away unnoticed I entered into the room that I shared with Ron, hoping I got away with my brief and very needed phone call. The place looked empty and everyone else seemed to be out and about so I decided to have a bath in the spa and try to relax before the night's precautions. My body glided into the steamy water as I began to think about T.J and how good it felt just to hear from a friendly voice. My thoughts drifted into the days I missed when I felt I could be silly and childlike and I nearly forgot for a moment how grown up I was acting these days.

My first glimpse at the image surrounding me when I resurfaced above the water was daunting. There was Ron was standing over my tub, looking down at me with an eager display of his arousal. He began to undo his pants and take them down when he told me "put your lips on my cock". I was too slow in responding to his request so he grabbed me by the back of the head and forced me into his groin. I had tears streaming down my face as I looked up to him with the saddest blue eyes hoping he would take pity and stop, but he never did. I was really hurt by his aggression and he definitely knew it this time, which I believe only made him more heated. I closed my eyes and began to count using the time to keep my thoughts elsewhere believing every number I counted only furthered me to the end of this. I just got over a hundred when he finally exploded in fulfillment still half submerged in the deep bath I was struggling to gain my bearings in as Ron was picked me up out of the bath and carried me to go to the bedroom, which was just outside the French adjoin doors. Still damp from the hot water in the spa I had goose bumps from the chill of the fresh air where he brought me to the bed and proceeded to deeply violate my every being. Eventually his scars that he left were too deep ever to be healed and would even carry on through the years to come.

Upon his bursting with pleasure for the second time, he just got up and left, without even saying a word to me. Left alone I was awake for hours after that. There was no escaping the pain that night. I lay naked wrapped in the sheets, sobbing in the dark. My feelings of being hurt and disgusted after his abusive ordeal "When will it ever stop" I prayed to God and begged for death rather than face another day in my life. I woke up still alone the next day and exasperated from the misery I felt the night before. Ushering through my drawers to find something to throw on I could care less what lay in store for me today, couldn't be as bad as being raped by a scary man repeatedly.

Starting my day with a few of the supplied oxytocin's and a bloody mary, made by the live-in house chef. Having two celery sticks for my breakfast, I wanted to lye out by the pool and forget the world. Ron hated tan-lines so to be caught with a bikini top on was a big no-no in his rule book but after my cries to stop were so blatantly ignored last night, I was out to piss him off so I didn't remove my shirt. I put on my headphones and before I knew it had fallen into a deep slumber from my self-made therapeutic cocktail, the only way I knew how to cope with the emotional turmoil on the inside.

Desperate to hear his voice I called my friend T.J a few more times that week. I needed to feel like someone out there really knew me. Sometimes we could just chat like old friends with no care in the world and laugh at a distant memory from too long ago. Then would come the good-bye part of the conversation and we would both get teary-eyed not knowing what could happen next or if this would even be the last time we ever spoke to each other again.

My biggest fear came to reality when I was in our bedroom one afternoon, just lounging around out of boredom. Ron came bursting in through the door, red as a tomato. I couldn't help but feeling I was in big trouble. His face was distorted and raging towards me. I knew right away he must have found out that I was calling T.J, but how, I had no idea. I had always tried to be as invisible as possible, soon enough it was all explained.

"Are you trying to get me caught? You are nothing but a stupid girl you know that! What am I supposed to do with you now?" He was tearing up the room while his rants gave me something else to think about. What would he do with me if he had no use for me any longer? I wasn't even thinking about him being caught for soliciting illegal immigrants for the purpose of prostitution. I was more worried that he would be upset at the fact I was talking to another guy, maybe even jealous that he was at least my age. I replied with simple sentences that I could manage to get out between all the shouting. I kept saying, "I'm sorry" and putting my head down in shame. He picked me up by my throat pinning me against the wall, "You are going away, far -far away from me and you better be nicer to the next man I send you to, I've heard he's not a nice as most would like. Are you fucking hearing me Bitch?" I slid down the wall, choking on the first air entering my lungs, breathless and terrified, I never thought Ron was a nice guy but I had never seen him lose it this bad. Now I was being sent me away to another stranger, another man, it only terrified me more.

The girls came in to say their good-byes all of them were crying and asking me in their best English languages, why I had to call someone and lose everything? I was able to find out through the broken sobs off of

them that the confession came from the house-keeper who said she saw me use the room regularly but was never messed up, so Ron looked at the recent telephone bills and found the same number dialed from that room consecutively, he knew it was me right away. At least he didn't know it was another guy, I thought to myself, or I probably wouldn't have made it out of there alive.

Ron came back to usher the girls out of my room and told me I had five minutes to pack my clothes, which he made clear were to be my only belongings to take with me. He washed his hands clean of me that night, or so he thought. The driver came knocking at my door, just as Ron said, no longer than the five minutes that he had offered me and he took my single bag to the car. I didn't want all the jewelry, music or books that he so caringly bought me as tokens of his twisted affection. Only taking my clothes and a wad of hundred dollar bills I had been saving, I slit a hole in my scrunchie inserting my cash for a rainy day that I was more than sure was just around the corner.

We drove for hours, until I started seeing familiar surroundings. I couldn't believe my own eyes. I was back in Miami, but not on the beaches, somewhere in the CBD this time. The Driver delivered me to the front door with my one bag and waited at the door with me. Now I knew how it felt to be a puppy picked from her litter as you can only hope your next owner would treat you with some sort of kindness.

Another balding man answered the door but he wasn't so grotesquely fat like Ron, but still a new owner at that. He looked me up and down and seemed amused as he snickered to himself. With one last look to the driver over my shoulder it was almost an appeal to him for some way to help me. I knew he couldn't anyways, I was just hoping. He told me his name was Charlie but didn't even bother in asking me for mine. I was sure Ron already filled in all of my details when he arranged this.

Charlie picked up my bag and led me into his bachelor pad townhouse. I was never given a welcoming tour of my new residence or made to feel comfortable. He walked me up the stairs and opened one of the doors in the small hallway. Telling me this would be my room, he showed me into it and told me to wait, he would be back shortly. I sat on my bed afraid to touch anything and after the warning Ron gave me I knew I had to watch my step around here. I put my head down onto the pillows my where world was falling apart and let my emotions downpour. Exhausted from the days emotional turmoil I ended up falling asleep. I don't even know if he ever came in at all that night.

The next morning I looked out of the window to see my new surroundings. It was a beautiful sunny day outside, unlike the dreary cell I was locked away inside of. Feeling the sun warm up my face through the glass, it radiated a familiar sense of comfort from the days of the good

parts of my childhood. I reminisced how it had used to be before all my life turned upside down. Before all of the fights with my family, before I had to look after myself, and before I was a slave to men.

Those days were too long gone now. With too many hard times passing me by it seemed surreal to think that life had ever existed in the first place. With that thought I shook myself out of reminiscing that way. Whatever was going to happen was out of my control now, I just had to give myself some hope that I would have the strength to get myself out these circumstances before anything really bad happened.

Chapter 2

The house was quiet so I just assumed Charlie was still asleep. I decided to get cleaned up and have a shower. Not even a knock on the door when Charlie walked in with ease. "Typical" I thought. It was an easy way for Charlie to break the ice. "You really are as beautiful as Ron said" as he opened the curtain. Watching me rinse myself in the shower and me knowing I had no way out of this except to go along with whatever he wanted. I just looked down at the mention of Ron's name, wondering what else he had told Charlie about me. Realizing later that he wouldn't have said anything anyways, in fear I would've been a damaged product that wouldn't make him the money that young girls go for.

He just sat on the side of the vanity top and continued to take observations of me standing submerged under the falling water. I avoided looking at him and let him do all the talking, after all I knew what I had to say was of no importance, that is if he was anything like Ron. Between the water beating down over my head I could slightly hear him ramble on about some club and restaurant he owned in Ft. Lauderdale. He said he was going to take me shopping for some club outfits and we would party together tonight, as if I was supposed to be excited over this so-called treat of his.

I looked up and gave him a quick smile adding a compliant nod and turned my attention to turning off the faucets and quickly grabbing my towel. I was falling so far from who I used to be, shying away from my outgoing personality to a quiet girl that didn't even recognize herself in the mirror anymore. I dried myself off and looked at the man standing between the doorway and me. He was still watching me with a sleazy look on his face but now preceded to move in my direction, arms wide open. He embraced me, running his hands up around my youthful curves, licking my neck and earlobes. Then his large, rough hands cupped my small breasts and continued downwards to feel in between my legs. I

knew what I had to do to get this over and done with as quick as possible, but I was dreading this moment from the second he greeted me at the door last night.

I fell to my knees and gave into his demented perversions. Thankfully it didn't last long before he climaxed and I was allowed to get myself dressed and ready to go out. I was nothing but money well spent in his mind. This was another extremely wealthy man with a completely new set of wants and needs asking a fourteen year old girl to affectionately dote on sexual desires to a man in his mid forties. I really hated myself, these men, and just about everything my life had boiled up to by this point, but I knew from a young age that to survive in this harsh world I would have to do many things I would not willingly choose to.

At the shops he decided he would choose the clothes he paid for, which I might as well have been declared a teenage prostitute. Just like Ron he also liked it that way. The more degrading he was to me only proved his ownership of my body. He bought me tiny cocktail dresses, and skimpy outfits, which I thought closely, resembled the lingerie he'd also bought for me to wear for him. I noticed that day that he enjoyed parading me around the shopping mall and out for lunch at hooters, even joking with the waitress that he'd like to buy her uniform because he thought it'd look sexy on his new girlfriend.

We arrived at his two in one, Restaurant and Club, at around nine o'clock in the evening. It was a revolving tower called "Hot Chocolates" in downtown Ft. Lauderdale. The food was delicious and for the first time since being with Ron, I ordered a hefty meal with steak and mashed potatoes with a scrumptious gravy smothered on top. Charlie ordered strong cocktails for us both and before I knew it my head was spinning and we were on the dance floor together. The music blared in my head and the rhythm of my body took over, completely forgetting about even dancing with Charlie and letting the music take hold and work it's magic.

It didn't do me any justice though as Charlie watched me imagining what pleasures lay in store for him later on. Taking me home before the club had even closed, he just couldn't wait to indulge on exactly what he was fantasizing from beforehand. Once back at his townhouse he led me up the stairs into his bedroom and pushed me down in the middle of his bed. The motions from the wavy mattress made me dizzy and feel even drunker when he lay on top of me. Coming at me like a hungry beast wanting to ravage his next meal, it was intimidating as he entered into me with a forceful thrust, he moaned out in delectable heaves. I looked away while he self indulged his own gratifying needs using my body as his instrument in pleasure. I only grew stronger in my head letting the hatred for men desires intensify.

The next two weeks I was expected to be at Charlie's beckon call, never aloud to leave his side, even making me sleep in his bed from the second night onwards. I never even got the chance to call T.J. again. It was too much of a risk anyways. Thus pushing him further out of my memory, too afraid, of the emotional repercussions.

Our typical routine was to wake up, get showered and dressed and I would put on my make-up while Charlie made his business calls for the day. We would leave the house mid-afternoon and run his errands do some shopping, sometimes meeting his friends or business partners for lunch, none of the men he introduced me to seemed offended at his choice of adolescent eye candy. They'd just continue to chat away as if it was normal to be in public with his arms draped over a girl young enough to be his granddaughter, not too shy by giving me a flirty tap on my bottom or even try to kiss me.

My last night was no different from every other night. We went shopping that day and out for lunch alone. Later we headed to a club his friend just launched and it was his grand opening that night. The club was called "Iguana Joe's". We met up with his friend and said our hellos. They both seemed so excited about the club and Charlie was full of compliments all around. The club did have a line out the door which looked a mile long coming in, luckily we didn't have to use the front door. Charlie returned from the bar with two giant long-island iced teas, which were his favorite drink to start with and then we just sat for a while watching people dancing. Occasionally conversing about passing thoughts. We danced for a while having a few more drinks and after about two hours, Charlie said he was ready to go home. What a daunting time to look forward to, he always liked to have a brief sexual encounter before drifting off to sleep with my naked body intertwined between his arms and legs.

It was bad enough to have to entertain him at every given second of the day but his grip on me was so stifling I felt so choked I could hardly breathe much less sleep. Eventually my over-worked mind would drift in-and-out of a restless sleep, but constantly on edge. I thought many of nights of escaping, but where would I go? Would one of Ron's ever-so-connected informants finds me and turns me into him to be disposed of for good? I just prayed that I wouldn't be another missing person to add to the list of girls found in the local ditches. I knew that's where I was headed if I screwed this up for Ron again.

As if my guardian angel was there the whole time listening to my secret prayers, my rescue came the next morning with an abrupt bursting through the bedroom door at about six am. Charlie and I were still lying in bed together and his grip on me was still tight. The men dressed in all black military gear had large guns and helmets on. It was so frightening

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at first. I couldn't even comprehend what was happening so rapidly. I thought Charlie could've been in some kind of trouble with a business friend he had done wrong too, but then one of the men in black shouted "F.B.I this is a raid get down with your hands on you head", in too much shock to move three of the men grabbed Charlie and threw him to the floor and cuffed him. I sat up in bed with my sheets covering my naked body and watched as they dragged Charlie from the room. Still completely nude he wasn't even aloud to get dressed. Another agent had to come back in to the room to find him a pair of shorts. I could hear him screaming at the top of his lungs all of the way outside He was screaming and the last thing I heard him yell was "If you say anything you know who will find you!" I could hear more threats being yelled at me but I couldn't make out what it was that he was saying. I was in total confusion and couldn't believe what was happening. There were so many uniformed agents I felt so small compared to all of them but they were all very kind and helped me out of bed allowing me to remain covered up with the bed sheets so I could get dressed. The first decency I had been showed in a long time. It was an odd feeling to acknowledge. I knew the life I had come accustomed to for the last six months was now over, and in so many ways I was relieved but was also very nervous about what lay ahead of me.

I excused myself to the bathroom to put some clothes on. Not having anything half decent, like a normal pair of jeans and a t-shirt. The best I could come up with was a metallic blue miniskirt and a tiny matching top that fell just below my breasts, hardly clothing at all it was more like scraps of cloth. Putting my hair up in a tight bun with the scrunchie that held my five hundred dollar bills I was led out of Charlie's townhouse for the very last time. Starting my life over...again, I wanted to leave behind my every memory belonging to these horrid times. Only taking small sack containing my underwear, makeup bag, and journal with me.

The agents led me down the staircase and my last vision's of Charlie was bent over the hood of a police vehicle still screaming and handcuffed. I slipped into the backseat of the car and was driven to Broward County Police Station where the Federal Agents interviewed me about my entire whereabouts for the last six months. I was so scared of what Ron would do if I told the agents what really happened but at the same token I knew he'd most likely kill me anyways for being such a liability.

Over the next few hours I sat down and told the agents how Ron's business worked and what I part I had to play to him. I was able to ask how they found out I was at Charlie's house and they informed me that I was being followed all the way from Ocala, Florida where Ron had me stowed away for the last four months. T.J., my friend, called my parents

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after our first phone conversation and ever since then, the F.B.I. were tapping the phone lines and recording every conversation. Completely unaware of T.J.'s caring act of deceit, I was in such shock that they had been tracking us for so long. I knew now, with or without my help, the F.B.I. had enough on Ron to put him away for a very long time, if they could catch him, that is.

Having so many crooked people working for you can be an advantage when you're in trouble. Like having a pair of eyes in every city. Ron was somehow able to find out about Charlie's arrest and immediately deserted the country to avoid legal punishment, not to mention the discretization of his esteemed clientele that the feds were now on to. Ron had so many countless charges put up against him, eventually when the F.B.I. were able to track him down they were able to have him arrested in Yugoslavia and extradited back to Miami, he was finally held accountable for being a pedophile, soliciting women for prostitution, and running many illegitimate and illegal businesses. By the time the F.B.I. caught him he was in his mid-seventies when he died of old age serving his second year prison for a lengthy sentence. Coincidentally I was told of his punishment and death many years later by one of the same F.B.I. agents that had rescued me from Charlie's arms.

I was taken out of the interrogation room after the interview was over with and told to sit at one of the officer's desk while I was waiting for someone to pick me up. Uncertain of who that someone would be I assumed it would be someone from the juvenile delinquents division to take me back to some state operated lockdown facility. Not the nicest of places to call home, but I had no choice in this matter.

Sitting back in the revolving chair I was twirling out of boredom and listening to the roaming conversations within the office. I pondered in fearful anticipation of the dreadful places that lay in store for me. Having to of spent a lot of my adolescence in these kind of places for the sheer factor that my mother said "I was out of control and unable to handle" by eleven years old. There was plenty of just reason for me to be so scared of those places. What I knew lay in store for me were constant fights between the rough girls being settled with violent raids then out came the pepper spray and then the strip-searches and worst of all, no sunlight. It didn't matter if you were a quiet, shy girl that didn't belong there, when there was a fight, which was could be like a few times a week, every person in the room was considered a threat and were treated like a violent criminal. I hated those places and the memories they gave me. That's why I always ended up back on the streets. No child or even a juvenile should have to be subjected to such unreasonable force and neglect. Some of the girls were so used to being subdued to this kind of treatment their

whole life they ended up repeating the same attributes as the people who initially hurt them in the first place.

One very sad girl I'll never forget her, had a father who had been a heroine junkie and decided to play Russian Roulette with some of his addict friends and by fate or chance took the bullet straight through his brain, killing him instantly. Her mother being a heroine addict herself spiraled downwards after his death and gave her four year old child to her ageing grandmother that eventually had to put my twelve year old friend in this un-dire circumstance. I can only have the highest hopes for her today but unfortunately for most girls that have been victimized by society aren't able to ever stop being a victim for the rest of their lives or go on to make other people victims themselves. A sad and unfortunate fate for so many innocent, and it happens so much more than anyone would rather admit too instead of just trying to find a solution.

Chapter 3

Hours later I was still twirling myself in the same office chair when I spun around to see my Father walking in my direction. I nearly fell off my seat at the sight of him. Gripping the chair handles I couldn't imagine what in the world I would say to the man I once used to call Daddy but now hated for the abandonment and unforgiving wounds he instilled inside of me. He contemplated putting his arms out to hold me but instead anger and shame took over and he just shook his head. I never saw my Dad cry until that day and I have to say it made me feel young again and sad I had disappointed my parents again. The agents now standing beside us led both of us together back into the interrogation room to re-tale my journey to my father who they said I had no choice to tell, or they would have to tell him for me, being I was an under-aged minor and Ron violated the statutory rape law, among many others, when he took me back to his apartment and kept me as his sex slave. My Dad couldn't believe what he was hearing and for his lack of better choice in words asked me to stop talking, he was just happy to know I was alive. Like everyone I'd known in life they would rather brush it under the carpet and not deal with the pain rather than realizing sooner or later it all comes out sometime in our life even if it transgresses into our future then becomes what we are willing to accept out of partners, work, and people in general. Simply saying in other ways than with words that our bad decisions befall our tragedies later on in life.

The next discussion was led to where I would go to from here. Before anyone could put his or her suggestion forward I leapt in with my two bits and made it obviously clear to my Dad that if I was sent away to

another lockdown facility and if he betrayed my trust, again, he would never see me again. I would disappear for good this time and for all he would know I could be dead in no time on the streets. He looked at me and for the first time in my life he saw the many years I had grown up in the time I was gone and heard the seriousness in the tone of my voice when I made my vow to him. He put his head in his hands and told me the bad news, my Mom didn't want me to come home and she was making his life hell for even suggesting bringing me back into their lives. I for some reason threatened her lifestyle and drove her crazy. I had been surprised about a lot of things lately but not that one. The last time I saw my Mom she ever so carefully lied to me and told me she was bringing me to an eye-doctor for an infection. Instead we walked into this tall blue building with people in uniforms holding clipboards and a few muscly guards, she ushered me inside and hurried up to close the large auto lock doors behind her leaving me there alone and imprisoned, which is what led me to recently living on the streets. My life was hell as long as she was in control of it, so when she didn't want me back at home I was fine with that too, but there had to be somewhere else I could go. My dad said he had no choice but to put me back into the facility, but he made a sincere promise that he would not take any longer than a week to try to find a place for me to stay and to go to school. A week I could deal with, but I was still unsure if I could trust my father and hold him to his word, but yet again, I had no choice. Being my legal guardian he could send me anywhere he wanted and there would be nothing I could do, except for keep running. I gave in, and before he left the officers to take me back to the last facility I had run from, I gave him one last hug and reminded him "one-week and I'm gone". Nodding his head and squeezing his arms tighter around me, I could only hope he meant it, but he didn't look too optimistic.

In the police car on the way back to the facility they had to handcuff me in case I ran again, but I had no intentions to anyways. I was going to give my dad the week before I began to search for the right opportunity to jolt again. I was like a "ghost come back," said so many of my girlfriends from the past and there was now a lot of new faces there too. At night when we were all in bed and supposed to be sleeping, I would be daydreaming of better days and imagine myself somewhere in a comfortable bed, actually enjoying my life for a change. A week went by in this facility spending most of my days locked up in what they called "The White Room", a bare room with concrete flooring, no toilet or even a chair to sit on. The only comfort I had was the blue sweater that was provided as part of the uniform, and my hair scrunchie filled with my stowed away cash that no one had found during my unpleasant strip-searches. I would spend hours in the white room for objecting to their

conformity and unwilling to participate in their drilling regime. I didn't feel like I owed any explanation to these people even when they brought a physiologist in to speak with me, "What was the point when I would be gone any day now" and as if any of these people even cared in the first place, I was just another number in the system and they had a job to do. There was one mega-bitch, female guard, named Evelyn and she used to either really like you or really hate you and God-fordid you were one of the unfortunates that she didn't like, she'd make your entire stay their an agonizing nightmare. Constantly picking on girls who were not strong enough to cope with their predicament or past issues, she'd stand them up and publicly humiliate them, and even when they begged her through their sobs to let them sit down, she'd only torment them worse. Which only made the strong girls want to antagonize the fragile one's with more malicious intent. Luckily when I had previously been there she didn't take much notice of me, but I stayed out of harms way with her, just being quiet and observant.

Being back here seemed like an eternity while I held my end of the bargain but unfortunately my Father didn't. The first chance I saw to run I took it. I was being sent to go get my blood and urine taken for drug and disease analysis. My driver would be a volunteer from the community and it was the perfect getaway for me. I was brought from the white solitaire room and led into the bright sun, feeling like today would be favorable in my escape. We got to the doctors office, my whereabouts told me I had plenty of ways to run and I scouted out the best looking route. My plan was to barge through the volunteer's inexperienced grip and wriggle my way out if needed, then hit the asphalt, running until my legs couldn't carry me any further. Playing it out in my mind felt different to the anticipation that led up to actually doing it. The inner-strength I had was the only thing going to help me in this circumstance.

We arrived in the parking lot and I hadn't said a word to him the entire drive, the small framed Spanish man tried to make pleasant conversation but I couldn't see him as anything but a challenge, so I kept quiet instead, ignoring his humorous attempts to befriend me. The car pulled to a stop and he came around the side to unlock my door, this was it, "here we go" I told myself, and pushed past the volunteer. His arms grabbed out at me but only caught me by my shirt, he didn't even put up much of a struggle, like some of the other trained one's I had gotten before, they would put me into body locks of all sorts but he just tore at the collar of my shirt letting me break free. I had done this many times before so I knew I wasn't gone yet, I had to first get out of these clothes. The cops would be looking for someone of my description in the area with a blue shirt and khaki pants, so my first stop was a busy shopping complex. I took the money from my scrunchie and bought myself a pair of jeans, a shirt, and

a sweater for disguise and my next stop was Dunkin' Doughnuts' to get a chocolate iced doughnut and a cup of coffee. I didn't have doubts about getting out of the facility but I wasn't expecting it to be so easy this time. My past excursions all began with an abrupt struggle sometimes ending in a brutal state of affairs after being pepper sprayed and fastened into some painful lock by forceful men four-times my size, then tossed into solitary until I saw my next chance to desert. I got to know the guards real well, as I spent a lot of my time being dragged down to the white room by them. There was Jim, a large black man who could've doubled for a "Miami Dolphin's" defensive linebacker. John was another big man with a ponytail and a mustache, and he looked like someone who definitely owned a Harley. The last guy Scott had a smaller build but made up for it with his steroid injected muscles bulging out of his neck and their was the added height from his curly fro. When they weren't restraining me and holding me captive in solitary, they were actually pretty nice guys, not afraid to have a laugh after some explosive incident and I held no contempt towards them either, they were just doing their jobs.

It was de'ja'vous all over again, free at last but where would I go now. With Ron's scouts on the lookout for me, and now the authorities being notified I was a runaway again, I would have a lot of people searching for me, so I knew I had to be careful where I went. My last stop before leaving the shopping center was to use a payphone to call my parents, my Dad answered completely surprised to hear me on the other end, I wanted to sarcastically thank him for breaking his promise to me and I hope he is happy now, he just lost his daughter for good. I stopped to listen to what he was trying to say and he told me "I was getting you out in a few days, I found you somebody to stay with, she's a good person who has got teenagers your age, I was just trying to convince your Mother to sign the papers to get you out of there".

I was so outraged at her ability to put her own wants before the needs of her own flesh and blood daughter. I told him to come pick me up and bring me to the house so I could speak with her for the first time in over a year, but if I felt threatened for one second I will be on my way quicker than a blink of an eye and on my own for good. He wasn't overjoyed at my proposition, knowing what position this put him in as her husband but as my father he decided to put me first for once and take me home to confront my mother.

I arrived at my house for the first time in a long time and everything looked different. My parents refurbished and renovated the house. I didn't even have a room anymore, my old belongings and bed were removed and it was now the office. Of course my Mom didn't meet me at the gate or the front door like her long lost offspring reunited. No, instead she

waited for me to come find her outback smoking cigarettes and having a beer. She stood up from her seat and squinted her eyes loathing in her hatred she coldly slapped me hard in the face. The slap stung, but I matched her look with a familiar stone-coldness that only she could understand. Immediately we both started to cry and we washed away our anguish and resentment through our tears and consolidated our feelings for the first time since the chaos first affected our lives. She didn't want to know much of my whereabouts and she still had a lot of anger to get over but she asked me to stay home at least. My little brother ran through the back door and hugged me so tight, I started to cry again and was saddened by how much time I had missed the time I had lost just hanging out with my brothers and it took me even longer to realize how precious time really is. We were never going to be the average Joes next door but at least this was better than nothing. I loved being with my family again. We had BBQ's and bon-fires with each other and life began to slowly piece back together. It was bizarre how normal it was when I first got home. I turned fifteen that year and it was the exact cup of tea that I had needed to boost me up and get me on the right track.

I decided to go school to acquire my general education diploma or G.E.D and got a summer job with my Dad at Mar-A-Lago, Donald Trumps exclusive country club in Palm Beach. Surrounded by lush acres of tropical landscapes, manicured gardens, and a mansion made into a beach club for the rich and famous it is known as the "Jewel of Palm Beach". I was in sheer awe at the gold arched ceilings and the grandeur ballrooms.

The spa where I worked was world class, not only oozing in style but in the way each and every clientele was treated with the upmost service. My focus was now set on becoming a massage therapist, and working my way into a luxurious spa like the one I worked for now, only I was a locker-room attendant there. I studied many books about the anatomy of the human body and how you can affect a person's well-being and health for the better through a simple healing touch. It was amazing to me the way the body responded to massage. I was more than just interested. I was determined to become a therapist.

It was one of those anatomy books that I had my nose buried in one afternoon on a quiet Tuesday and it could get pretty lonely in the locker room, so if I weren't busy I'd sit outside by the spa's reception and read my books in the warmth of the Florida sun. A lovely looking woman in her late thirties who spoke with a proper English accent approached me. I assumed it was a general question, "like where's the ladies room or was that the famous model from so-and-so?" but she was more interested in the book I was reading. Only believing at first we were just making small talk she was really intrigued at my choice of reading. She then asked if I

did massage on the side, I stated I was only reading the book and had not yet begun to study but one day I would love to practice massage therapy.

She introduced herself as Ghislane Maxwell. I would later find out that she was the daughter of the late prominent businessman and disgraced newspaper tycoon, Robert Maxwell. I told her my name is Jenna pointing to my nametag on my shirt and offered her a cold or hot beverage, as those were my instructed duties at work. She accepted a tea and went on to chat a bit about this rich guy that she worked for and she knew off-hand that he was looking for a massage therapist. Just doing me a good deed out of her kindness of her heart, I'm sure, she offered to introduce me to him. I declined her first proposition, thinking out loud, told her I didn't know the body well enough to even attempt an interview. She didn't seem worried at all by my fear of incompetence saying that if he liked me enough he would get me the best training in the industry. Ghislane thought I had a cheery persona and fit the quota for what he was looking for and as she put it an enthusiastic learner that she said she gathered from the sticky notes popping out of the various sections in my book. I accepted her phone number and the house address and told her I will call her if I am able to come over after work. I rushed over to the tennis courts where my dad was working and told him of the news. We both thought this could be a wonderful opportunity to get my accreditation in massage therapy. Seeing that it was a lady in her late thirties who came off as more of a nurturer rather than a procurer, neither of us saw any reason to be hesitant.

Chapter 4

At around Five p.m. my dad drove me down to the bottom of "El Brillo Way" on the Palm Beach intercostal. We pulled into a short driveway beckoning a large pink mansion with heavy wooden doors. I was so excited about this chance and asked my dad to wish me luck. He gave me a big squeeze and wished me the best. He walked me to the front door and I rung the door chime. Moments later we were greeted by an older gentleman dressed in a casual butler uniform. I told him I was here to meet Ms. Maxwell for a massage trial and he opened the doors for my father and I telling us to wait in the entry as Ms. Maxwell would be on her way any second, and she was. Down the stairs she walked with a warm smile, her short black hair seeming very proper and elegant, for now. She shook my fathers hand and thanked him for bringing me and kissed us both on the cheeks. They spoke briefly about whom she worked for and about Mar-a-Lago where we worked. She was in hurry, you could tell to end the conversation and say good-bye to my dad, which she did so

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ever pleasantly. She said the boss was upstairs and waiting my arrival, so with that I said bye to my dad and began to follow Ghislane up the stairs. I was so nervous, but I didn't show it. I kept my reserve and demeanor cool as ice, trying show maturity for the open position. We continued on to the massage room, passing by a grand crystal chandelier, and a couple lengthy wooden hall tables displaying a multitude of photos displaying young girls and beautiful women, trying not to gawk at them. I didn't even notice that some of those girls were only wearing their smile.

Ghislane asked me how my day at work was and I told her it was easy peasy as always just trying to make simple conversation. There was a fork at the end of the staircase and she led me to the right hand side. The lights were dimmed in the bedroom but I could still see the King Size bed in the middle of room, we did a U-turn around the bed, which led us into a massage room. Dripping in luxury I could've definitely compared it to the renowned Mar-a-Lago's spa's, it had marble walls and a glass enclosed shower and self-automated steam room at the very end of the Burberry carpeted room. There was a large mirror over a basin to the right of the room with an array of oils, ointments, soaps, and lotions and a small closed door, which I assumed must be a closet. The only thing that struck awkward about this room was the naked man laying face down atop of the turquoise massage table in the center of it. "I had to be prepared for this," I told myself. Massage was something I had never done before so I quickly brushed away my thoughts of possible schemes, wanting to believe whole-hearted this was going to be legit. Ghislane introduced us to each other and I proceeded to make his acquaintance.

Looking up at from his downwards position, he looked me over and gave a smile to Ghislane, an obvious notion of his approval. He was Jeffrey Epstein as she pronounced for him, as if I supposed to recognize his name or something. He affirmed, "It was his pleasure" and replied to just call him Jeffrey, "No need for formalities" he answered, cleverly putting me at ease. This man did not look like someone to beware of. Both him and Ghislane appeared to be very nice people and conscious of their health as their need for massages and spa visits, no alarm bells went off, yet, I was prepped by Ghislane to "treat this as a lesson from her and follow her exact lead, if I did good tonight then maybe I would become Jeffrey's Travelling Masseuse, seeing the world and getting paid well for it". I was very hopeful, a job like this could really make my dreams come true.

I followed suit and washed my hands with warm water so the coldness would not shock Jeffrey's naked body, then lathered them in rich body butter. Ghislane told me to always keep one hand on Jeffrey, even when getting more lotion, so it didn't make him lose concentration on being relaxed. She gave me a tip and told me to keep a blob of lotion high up on

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my forearm so it prevented me from having to keep going back for more and was less disruptive to Jeffrey. This all seemed for real to begin with, I was being educated about the body and splitting Jeffrey's body with Ghislane, mimicking her every motion. Starting with his feet, we began with his heels and arches of his soles. Pushing the blood up his calves in upward strokes to rejuvenate the body's blood supply and being careful to mind his leg hair didn't pull. I was keeping up with her and enjoying the education. It was so interesting how the body worked and I couldn't believe I was learning all of this for free. Once I got a bit of a groove following Ghislane, they began asking me all sorts of questions about my past and it didn't take long before the conversation led down the darker experiences of my young life. When they found out that I hadn't led much of a normal existence they only probed me with more questions, which being put on the spot answered honestly. The funny thing was they didn't seem appalled at all by my statements, rather entertained if anything. Jeffrey called me a "naughty-girl" with that wry smile of his, and half playful and half defensive, I answered "no I'm not, I'm really a good girl, just always in the wrong places" he then replied, "it's O.K, I like naughty girls" and rolled over onto his front side to expose his complete nude self. He wasn't the first man to show me his penis, so I wasn't shocked at the appearance of his manhood but I was incredibly shocked at his complete ease to present himself with an erection. I tried to ignore it waiting to follow the next directions off of Ghislane, who surprisingly now stood behind me bare breasted. Before I had a chance to even think of replying hastily she began to slowly undress me, while Jeffrey started to stroke his manhood while watching us. She unbuttoned my blouse and removed my bra, revealing my bosoms. Cupping them in her hands she moved her lips across my nipples, licking and teasing them with her tongue making them cold and stiff. Next her hands moved down to my little white skirt, removing the final piece of my remaining uniform. She slid my skirt down my legs with ease, for a moment keeping on my love-heart panties, so they could both take notice of my apparent youth. They even snickered to each other about "How cute she still wears little girl pantie's" Jeffrey said, and Ghislane joined in his laughter.

Acting as my madam, she instructed me to start by licking his nipples and after I had sufficiently pleased both of them, then prompted me to go down on Jeffrey orally while she rubbed her breasts along his body tantalizingly. She moved behind me again this time to remove my panties and start fondling the delicate folds between my legs. I was still in shock from the initial degrading blow. I hadn't even let the reality sink in, it was all too much for me to emotionally handle so instead I hid behind my fears, which I told myself "I wasn't going to ever be worth anything at all and this would probably be as good as it gets for me" after all I thought,

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"what have I been trained up for until now". Nobody ever stopped to ask if I was comfortable or if I wanted to stop, no, instead, Ghislane only directed me to conclude the massage session by climbing up on the table to be fixated on Jeffrey, straddling him so he could penetrate me.

When it was all done and over with, I was taken into the steam room with just Jeffrey to get further acquainted, as Ghislane left the room to go get dressed. He asked me to grab his feet and rub them not saying a word about what just happened, like it was all normal and accepted. I listened to him ramble on about the health benefits of a sauna and the history of it, ignoring the fact of the matter of his pretentiousness degrading my spirit. I figured I had gone too far already, what would be the point in throwing in the towel now after I had done exactly what these people wanted.

Whilst we were sweating out our bodies' toxins, and the steam was blasting my burning face I listened to his lessons, entertaining his ego, I let him become my teacher, he seemed to like that. He sounded like a very clever and intelligent man though. Telling me his story of how he made himself an empire of billions from being a middle-class professor to an elite financial advisor for clientele with only billions in their bank accounts and through his so-called "lessons". He became my mentor and I emerged as his pupil, the teacher's pet.

After the sauna we went to the next glass door beside us where the shower was. He turned tap outwards and stood underneath the water as I stood naked and cold from the temperature difference. Instead of asking me to join him under the warm stream, like I thought he was going to, he handed me a bar of soap and asked me to wash his body from top to toe. It didn't stop there I had to massage the shampoo and conditioner into his scalp as well. I was bewildered someone would ask this off of someone else, wasn't it belittling enough having to endure the illicit massage from beforehand but now this. The surprises kept coming that night, as this was definitely not how I expected my interview to turn out, but that's what I had learned in my short time on this earth, life was full of disappointment.

I let everyone else take the power of authority from myself and use me in whatever way he or she wanted instead of standing up and giving myself the respect I deserved, which in turn would've helped me get through life without all of the abuse I ended up coping. Not given the belief in myself from an early age on I suppose is what affected my sense of control. Always letting the one's with power and strength reduce my inner-self to shreds until I was cut so tiny in size I would be completely subdued to only their wants and needs left ignoring mine. The men I had encountered in my short experience with them only repeated their inflictions convincing me there was no running away from the sick world I lived in, not yet understanding it all came down to the choices I had

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made for myself, I needed some encouragement and the right words to unlock my very soul.

Jeffrey told me the towels were on the heated rack just outside the shower and asked me to get one and pat him down. Again putting himself first as I sat there freezing while I complacently patted down his body with the white fluffy towel until he was dried. I nearly expected him to ask me to dress him as well, but not surprisingly that came later down the track too. I dried myself off and wiped the make-up from under my eye's, keeping quiet not sure what to really say and half-embarrassed from the entire evening's events that just took place. I just remained silent whilst we both got dressed until he brought me downstairs where Ghislane was sitting at a desk holding his black leather duffel bag. When she moved from the chair to let Jeffrey sit down, she passed him the bag and began to tell me that I had great potential to be a massage therapist, they really liked my style and who knows where this could lead too. She asked to see me again tomorrow, same time after work. He opened the bag, revealing stacks of brand-new hundred dollar bills separated with rubber bands to count by the thousands. He grabbed one stack and took out two crisp notes, placing them in my hand. He laughed that it was nearly my whole week's wage at Mar-A-Lago. Only there I didn't have to degrade myself as his new little toy.

When I got home my parents were anticipating my arrival. I kept it simple and sweet with my folk's, only telling them of the lessons about the body I had received and the future prospects in massage therapy that lie ahead. Nobody questioned who I was working for and complimented my ability to be a hard worker. I quickly got out of that conversation afraid I might give away a hint of shame in my eyes but no one caught on. I excused myself to the bathroom to have a shower and stared into the mirror for a moment, asking myself if I could really go through with this only to mentally respond by reminding myself this would be as good as it gets for a girl of my stature and limitations. I scrubbed myself rigidly in the shower as if it would wash away the filthiness of the night, but it didn't help, I could still feel their hands in me and all over me and inside of me. Trying to sleep that night was nearly impossible too, closing my eyes only to drift away to flashbacks of the moments I had to give myself to Jeffrey and Ghislane, each replay an exploitation of my vulnerability.

The next morning I awoke feeling anxious about the day ahead, trying to push yesterday's memory from my thoughts, I was quiet for the whole trip to work with my Dad. Before we got out of his car in the parking lot he asked me if everything was okay, I lied, for his sake and mine. My life was being transformed and I didn't even know it yet, but soon enough I would be a brainwashed tool only used for the sexual pleasure of others.

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GJUFFR004160

About to be entrapped in the same life I had broken free from only months ago.

Convincing myself in order to succeed I had to step up from being a girly teenager and start thinking like a young woman, it would be my ticket to a great career and a fortunate life. I told myself "So what if I had to bargain my body to this rich old geezer, some girls get themselves through college by becoming a stripper and using their bodies to pay for degrees, others go down even worse paths." I guess it was just another way to fathom the road I was going down, the effectiveness of the lies I forced myself to believe was working as I continued to tell myself I had to make it any way I could rather than ever letting myself sleep on the streets again. I was trading one shocking lifestyle for another, thinking I was choosing the right one. If I could go back in time to ever meet myself I would choose this time in my life. I'd start with a good hard smack to my head to first shake some things up in there and next I would tell that girl she could actually make it on her own if she just worked hard at earning an honest wage and built her life up slowly. There is no rush or time limit to ever stop reaching for achievement. Sadly enough I probably wouldn't of even believed myself anyways, learning my life's hard lessons through the experiences I continued to suffer.

I went to work at Mar-A-Lago that day trying hard not to think of what lay ahead in the afternoon too come, but the later the hour got the more distinguished the knots became in my stomach. I spoke to no one of the details to my explicit interview but told one girl how I was so happy I was now officially studying massage therapy, another lie. My friend was surprised and intrigued that these people who could afford the best of the best of therapists in the world chose an untrained fifteen-year-old girl to perform a massage. She never said it in words, but her body language told me she knew exactly why they wanted to use me and it wasn't for a therapeutic reason either and deep down inside I understood.

The rest of the afternoon slipped away quickly and before I knew it I was standing before those large wooden doors again, giving a moments pause but long enough to draw in my breath and exhale some of the anxiety before ringing the doorbell. Juan answered the door again and told me Ghislane would be down in a few moments and asked to follow him into the kitchen. There was a pleasant looking young girl with blonde spirals in her hair that glanced up from the mound of paperwork before her. Her shocking blue eye's and appealing English accent seemed delightful and she introduced herself as "Emmy", Ghislane's Personal Assistant. I introduced myself as "Jenna" which is what most people knew me as and told her I was on an employment trial to become Jeffrey's massage therapist. She had a coy smile on her face that told me she knew exactly what I was on trial for. Something in my gut told me

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GJUFFR004161

this wasn't the first time a young girl had been trialed for the same position I was about to fill.

We were only chatting for a moment before Ghislane appeared and told me Jeffrey was ready for his massage. I was led through the extensively large house to the winding staircase that would lead me up to the same dreaded room where I would have to re-enact last night's performance. I wasn't far from wrong. I gave Jeffrey a massage with Ghislane leading the way again, this time we surprisingly made it to the front of his body and she continued to show me how to massage all the way up to his stomach pushing my hands in a spiraling clockwise circular motion to not disrupt the bowels and then we came up to his chest. He couldn't dare contain himself for one second longer, telling me to put my lips on his nipples and give them a kiss. Jeffrey moaned in pleasure and Ghislane started to undress me from behind. Within moments I was completely naked and Ghislane had her top off. She was caressing my body with her hands while Jeffrey moved his hands down to stroke his loins while he watched her and I kiss and touch each other. I didn't know if she was doing this for the sake of his eye-candy but she sure did act like she loved having the control over me telling me what to do throughout the entire threesome. Jeffrey's climax was always the end to our sessions and this time he wanted to have me make him orgasm orally. Afterwards we went for the ritualistic steam-room, this time Ghislane joining in with us for conversation. She asked me to massage her feet this time while we were in the steam room, showing me that Jeffrey wasn't the only one I had pay my homage to. We all had a shower next and then we all went downstairs to pay me and have Juan drop me off back home.

The following afternoon I received a call at work, surprisingly it was Ghislane asking me to come over when I got off of work again. The compliant side took over and I told her I looked forward to meeting with them today, instead of telling her to go screw herself for lying to me and making me degrade myself more each time I saw them. I finished work for the day and my Dad brought me over to El Brillo Way again, where the vultures were patiently waiting in their lair, he wished me well as I hopped out of his big truck, looking ever so much like his little girl again. I gave him a smile and a wave as he drove down the long driveway, waiting for him to suddenly turn back and not leave me alone to my task. I shook myself out of that calamity and put on my "big girls" face.

Juan brought me to the kitchen again as I waited for Ghislane. He offered me a cold drink and some fruit on a platter, I accepted and was grateful for the rejuvenation before I went to work again. It wasn't long before Ghislane approached me from behind with a cold intense look in her eye. I jumped from my seat, feeling like maybe I shouldn't have been eating and drinking while on the job, as her demeanor seemed annoyed

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GIUFFR004162

and temperamental in the seconds that she appeared. She told me I would be on my own today as she had business to attend to, so make sure I remembered what she had taught me, as my trial depended on it.

Chapter 5

I walked up the stairs by myself this time, taking in more of the décor, noticing the more I looked around the more I noticed a different girl in each photograph in his collection of half-nude and topless girls on display around his mansion. I couldn't believe how many girls there were, it's not like Jeffrey was much to look at. He was an aging man in his early fifties with shiny grey hair and characteristic lines drawn down his face as if he had seen harder days. With no prospects of ever settling down or having a family of his own, Jeffrey treated us girls like a piece of clothing he could try on for the day and get rid of the next. So why was there so many girls in these photo's? I wondered to myself if I would end up one of those girls among his collection of forgotten relationships and broken promises.

I continued to make my way up the stairs, and as if all of my senses were heightened from my bare nerves being exposed. I could smell the cleaning detergents recently used by the housekeepers. My observations of the shade of lighting through the concealed blinds as I entered Jeffrey's bedroom appeared golden, and the sound of stillness except for the thud of my rapid beating heart all made me more aware of how nervous I was to be on my own. Not that Ghislane was anything of a comfort, but I didn't know what to expect or how I was going to lead myself into upholding my obligation in pleasing him. I would hope for the best I thought, trying to uplift my confidence as I opened the door to the massage room with the typical scene of Jeffrey laying naked facedown in the massage bed waiting for his entertainment. It was de'ja'vous' all over again. Repeating what Ghislane had taught me, with him commenting on what else I should be doing, until it got to the end and I was expected to grant him all of his spoken desires. We finished up with the shower again and he seemed very pleased in my contribution of myself to him, giving in to every request.

He told me to go ask Juan to pay me, as he was lethargic after the massage and intimate affair between us and now was going to have sleep. I walked back down stairs and told Juan that Jeffrey was asleep and said I had to ask him for my pay. He went to Jeffrey's desk and took out the exact amount I was owed without even asking how much I normally get paid. He then drove me home, only to be back the next afternoon.

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GIUFFR004163

The following week was a daily routine, providing Jeffrey with massages and continuously being groomed to fulfill all his needs. Often joined by Ms. Maxwell and her assistant Emmy for sexual trysts of all kinds. I was mentally and physically exhausted from the week of working and having to keep up with Jeffrey's strenuous late night activities. I couldn't believe what I was doing but it was all starting to sink in fast. Most nights when I got home, I'd briefly say "Hi" to Mom and Dad before heading straight to my bedroom. I couldn't even sleep well anymore. Closing my eyes at night I would fight the inevitable flood of thoughts, replaying the moments of shame that ate away myself piece by piece. My only reasoning being I just had to keep telling myself it would all be worth it in the end.

This afternoon Ghislane appeared to be in a much better mood. Instead of taking me straight up to Jeffrey she took me to a yellow guest room where Emmy mostly stayed. It had a balcony where Emmy was already outside reading a magazine and puffing on a cigarette. Ghislane lit one up too and then offered me one. I hadn't smoked cigarettes much before, besides trying to look cool in front of one of my friends, but never really took to them, so when I started to cough from the inhalation of smoke, the girls began to laugh and joke about my in-experience. It was an icebreaker for all of us to laugh and poke fun at me. I was then able to give it back to them saying I would rather be an in-experienced non-smoker than an old lady with a raspy smokers cough. I don't think Ghislane was used to somebody giving it back to her, but she seemed to like it, as long as she was able to have the last say. I knew my boundaries and she liked that I wouldn't cross those invisible lines. All three of us chatted like friends and it started to feel like some kind of a strange relationship was budding. After about fifteen minutes of chatting away, Ghislane instructed me to wash my hands thoroughly, as Jeffrey hated the smell of smokers, and to follow her down the hallway to the massage room where he'll be expecting me shortly. I did what she asked and sprayed myself with the body spray that I always carried in my purse and headed down the hall to Jeffrey's room.

When I opened the door to the massage room surprisingly it was empty. I sat down on the already made up massage table and was careful not to mess up the neatly folded towels on the end of the bed. It was a good fifteen more minutes before Jeffrey made his appearance. It was strange seeing him in clothes for the first time. He wasn't wearing what you'd expect your typical billionaire's attire to be. He was wearing a pair of sweatpants and a Harvard sweatshirt, which he began to remove immediately. This time he wanted to commence our session in the steam room, so I began to undress as well. We went into the steam room and he pushed a few buttons and the steam began to pour in from the marble

wall's built in jets. There was a bench coming out of the wall also made out of marble that went from either side of the room and had a step underneath it where I was instructed to sit on so that I could begin giving Jeffrey his massage. Our conversation started off about simple things like how was your day at work, and I asked Jeffrey how his day was lounging around, just being polite to each other. He was acting out of character being a lot more attentive and conversing with me about other things than sex or massages for once. Starting with his heels, ankles, toes and arches in the soles of his feet I massaged all the way up to his calves. It took a lot more strength to massage in the steam room without oils or lotions and the constant blowing of steam in your face making me twice as exerted. I was beginning to really start to heat up when the door to the room suddenly opened to reveal two naked women. Ghislane and Emmy acted as if they came in to join us for a steam bath, but my instincts were telling me otherwise. At least the cold burst of air and escaped steam revived me a bit.

So there was Jeffrey and Ghislane sitting on top of this marble bench, each with a young girl at their feet. Emmy and I continued with the massage until they were ready to head into the shower. There were two showerheads that Ghislane and Jeffrey both stood under while they were being lathered with soap bubbles as we washed their bodies. After the shower Ghislane led us into Jeffrey's bed to finish today's session with Emmy, Ghislane and I performing lesbian acts of foreplay on each other while Jeffrey laid back and watched. Stroking his manhood in much delight, he brought himself to climax, and the session was over within moments. We all got dressed and went downstairs to the kitchen for some refreshments. Like nothing had happened at all, it was all so bizarre for me, the whole ordeal with them since this all began. I couldn't understand why Ghislane and Jeffrey had such an openly intimate relationship but yet never regarded themselves as partners. They rarely kissed and never held hands or even slept in the same bed. It was more like a sexual arrangement between the two of them. She brings in the girls for his peculiar taste and he supplies the lavish lifestyle she was accustomed too before her family lost all of their fortunes. I wasn't sure how to act or feel, always obliging to their needs but reserved enough not to get attached, as if there was this invisible hierarchy and by instinct I knew my place.

We all hung out in the kitchen for a while before I asked when Juan could bring me home as I had work in the morning and was tired. They said no problem and called Juan on the intercom right away, but said we'd all have something to talk about tomorrow. I knew it had something to do with my employment trial and from the way they were acting tonight, I could only assume I got the job, but you never know with these

types of people. Their friendships and partnerships can change like the weather.

I went home that night still confused on how I could let myself sink so low, I had to put on an act like I enjoyed submitting my body and being their new subservient plaything all for the fact that I was making anywhere between \$200-\$400 for just a couple of hours. Then spent the rest of the night regressing on the entire event in my head over and over again. I battled those thoughts with the hope that I was receiving a profession out of this and making good money in the meantime. All I had to do was keep lying to myself long enough until I eventually believed it. Arriving at Jeffrey's on time the next afternoon, as I always did, understanding punctuality was a sign of respect and I wanted them to feel as if they had my deepest appreciation for the once in a lifetime chance they had given to a girl of my history. This time when Juan answered the door he told me Mr. Epstein and Ms. Maxwell were waiting for me upstairs in the massage room. I began my hike up the familiar spiraling staircase and through to the room where my arrival was being deeply anticipated. They were already in the steam room awaiting me to join them. I undressed out of my uniform and folded them in a neat pile, which I placed upon the marble basin. Having one last look in the mirror before I exhaling a deep breath as if I was plunging into deep water, I knew today was a big day. I either accepted their offer and trade my morals for opportunity, or walk away with the prospect of one day many years from now trying to make it on my own which I knew endowed hardships of there own.

So confused about what decision to make, I just opened the door to the steam room and let them do the talking. Used to the routine by now I sat below Jeffrey and began to massage his feet and legs as I listened in on their ongoing conversation about travel plans for the next few weeks. Ghislane and Jeffrey turned their attention to me and he asked me how would I like to go see the big city of Manhattan. I told them I had never visited New York before and it sounded like an adventure but my job at Mar-A-Lago was only a summer job and wouldn't be able to get the time off, especially that summer was so busy anyways.

Jeffrey then made his announcement, that I should just quit my job at Mar-a-Lago and become his permanent travelling masseuse. He then further persuaded me with all of the luxuries that came along with my acceptance. Rather than being paid \$9 dollars per hour at my current job I could be earning \$200 dollars per massage, which he even said could be a few times a day. Tomorrow we could be leaving Palm Beach together in his private jet first heading to his residence in the upper east side of Manhattan, also the largest mansion in N.Y, and would next be setting off to the Caribbean, where he owned a secluded island just past Little St.

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James for a bit of relaxation. The temptation of his grandeur offer wasn't hard to give into, my vulnerability to be lewd into his grasp seemed comforting at the time. The idea that females were nothing more than an empty shell of beauty bound by only a body to offer was a notion I had accepted a long time ago with my first teacher, Ron.

My reaction had to be more than amusing for their egos, even though I was excited to be traveling I could only imagine the likelihood of having to be at their beckon call as well. In my head I just told myself we all do what we have to do in our lives to succeed no matter what it takes, and with no one knowing the truth, I had no one to talk me out of it. I accepted his offer and knew from here on out I would be his servant to his sexual desires until one day I would gain my credentials and only then could I go out on my own and make it in this world that when so young seems so unconquerable. The night advanced into the usual grooming of his requirements, for the next hour and a half being exploited to satisfy Jeffrey's every sexual whim.

My mom cornered me that night, before I had a chance to avoid speaking to anyone, heading to the shower then my bedroom. Like I had been the last week. She knocked at my door with a hostile look in her eyes, "Virginia, what exactly does an older couple want with a fifteen year old girl, who has no credentials and with no experience in massage therapy?" She used that stern tone of voice that she's always had, when I was in trouble.

Thus, as impressionable as I was, my blue eyes batted their innocence in her direction and I flashed her a girlish grin selling her the pitch that I had been given earlier that night. Not mentioning the other side to the glamorous lifestyle I would soon be living in. I told her about the money I'd be earning, the places I'd be seeing, the people I could meet and most of all the trade I'd be learning. It all sounded so good, except it was a bunch of lies I had to tell her and myself to otherwise convince us, that this was a once in a lifetime opportunity, and I had to take it.

She asked when all of this would start, and I as shocking as it was to me too, I told her I had to go start packing. We were leaving the next morning off to N.Y.C. At fifteen most girls would be sucking up to their parents to go to a high-school dance or to go on a date to the movies with a nervous chap, but I wasn't even asking her. I was simply letting her know that I would be away for the next couple weeks, maybe three and would keep in contact when I got free time. Her daughter was lost a long time ago, and she just now realized it. Backing out of the bathroom, with nothing she could say, she left me wondering to myself who I was becoming.

Instead of driving me to work the next morning my Dad dropped me off at Jeffrey's mansion, he told me not to worry about calling Mar-A-Lago,

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he'd take care of it for me. We said our good-byes outside in the driveway, Jeffrey even coming outside to meet with my father to shake his hands and assure him that his daughter will be more than looked after. I hugged my dad tightly, feeling like I was on the verge of a steep cliff, when he let go, so did the last of my innocence.

Juan drove Jeffrey, Ghislane and I to Palm Beaches' Private Airport and the luggage handlers escorted us on the tar mat where we all boarded on Jeffrey's black jet. Larry was his main pilot, he had shiny grey hair and long lanky legs, but a very sincere smile that instantly made you feel at ease. He greeted us at the staircase that led into the main cabin. It was as lavish as I imagined it would be. The seats were enveloped in the finest beige leather with polished wood grain finishes and there was a kitchen in the back with an adjoining toilet. Jeffrey saw the amazement in my eyes and to make it more thrilling he brought me up to the cockpit and let me watch with a bird's eye view of the take off. I was on a natural high when I came back to the cabin and was instantly brought back down when Jeffrey rested his bare feet on top of the reclined seat and instructed me to get to work and start massaging him. My future was in his hands now, so when he wanted something, I wouldn't hesitate in giving it to him.

Chapter 6

Upon our arrival at New Jersey's Private Airstrip, the driver Jo-Jo met us. His name was most likely shortened for something of his oriental decent. Jeffrey liked to shorten the names of his multi-cultural staff into American names. Even Juan and Maria were known as John and Mary. We arrived in the Upper East Side of Manhattan. His principal place of residence was the largest home in Manhattan, eight stories of opulence. It used to be a Private School for boy's many years ago, until Les Wexner, Jeffrey's best friend and mentor bought it for him as a mysterious gift.

There were two large Chinese gargoyles outside the entrance, and beside the heavy looking wooden doors there was an intercom with a camera overlooking us. I walked up the concrete steps into a realm of wealth, glamour and most of all influence. My eye's glistened at the splendor of his palace. Caramel colored marble tiles spread through the first floor, where his gourmet kitchen and dining hall were also located. Then I came to this sweeping staircase that curved into the next level where Jeffrey and I went into his office, even though it looked more like a museum exhibit. Ancient draperies that told lascivious stories of their own covered parts of the elevated walls, and the remaining wall spaces were taken up by rows on top of rows of books. He loved to read, as he

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often found it hard to sleep and was comforted in the early morning hours with his literature, or sometimes in other ways I would come to find out. There was a mantle piece and a sofa with two armchairs next to the grand piano that flaunted more of Jeffrey's beautiful conquests, young women posing in salacious pictures, suggesting I could be easily replaced next to one of those girls if I failed in keeping him satisfied. There were also some pictures with recognizable political and royal figures either shaking Jeffrey's hand, or with an arm around each other, even one with Jeffrey and the Dali Lama, although his church was the bank. He liked to use his power, wealth, and money to manipulate everyone in his life.

He made a phone call that sounded business like and I didn't mind, I was quite enjoying taking in all of the beauty around me, I was blinded by all of it. I was still waiting for him when, Ghislane came in. She asked me what I thought so far of my trip to N.Y.C, I knew she was talking about the house, she loved to gloat, even though none of it actually belonged to her, she wanted everyone to believe that it did. I complimented her on the mid-evil looking tapestries and a few other adornments, when she cut me off mid-sentence to compliment it herself, telling me the history about one of the 17th century tapestry's which to an unsophisticated eye, looked to me like a rug on the wall.

Jeffrey hung the phone up and walked over to the sofa where we were sitting next to the mantle piece and took a seat on one of the armchairs. He didn't seem worried from the phone call but his mind was definitely somewhere else from the hard look on his face. We all spoke for a few moments more about the splendid décor before Jeffrey had enough small talk and needed some of his own relaxation time. He told Ghislane he was going to show me to the massage room and he'd be back in a couple hours. She agreed he looked like he could use some time to unwind and with that wry grin of hers, she gave me a look that told me precisely how he was expecting to be relaxed.

We left his office all together, Ghislane going downstairs, and Jeffrey showing me to the lifts. The lift looked like it's original that came with the school. It was made out of brass antique with archaic cuts throughout the arches at the top. It wasn't the only lift in the house, but certainly the most beautiful. We walked down a long hall carpeted in a royal red and golden trim, passing by a bronze pagan statue of the horny little goat God "Pan". How adequate, I thought, fit Jeffrey to a tee. We walked into this dimly lit room. Another daunting chamber that looked like we had stepped back in time to the dark ages. It took a second for my eyes to adjust to the darkness, and Jeffrey beckoned me to follow him through the room to the open adjoin shower, toilet and steam room. The room was in black marble to accent the dreariness, and smaller than the one in Palm

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Beach, but it had it's own witchery feel to it. Another unseen side to this Man I was coming to know.

We both undressed and I followed Jeffrey into the steam room first. He loved feeling clean, teaching me that the steam would deplete the toxins from your skin, which was great during a massage when your blood flow is being replenished. I grabbed his foot out of instinct, knowing I had to be constantly on alert to keep this man satisfied. He looked down at me with a nod and reclined back against the wall as the steam pored in, this was his idea of alleviation. I worked up to his calves and within a few more minutes, he said he was ready for his massage on the bed. We got out and towel dried off; both still nude, he asked me to stay undressed, then we headed to massage bed in the middle of the room. He lay down on the bed and told me to turn on the CD player on the wall hutch, where all of the oils and lotions were set out, I hit play and a collection of mixed classical symphonies began to fill the silence. I could tell he wasn't in one of those moods to be uplifted with idle chat, so I remained silent, letting him enjoy my slow movements, making my way up his body. My instincts told me I was right about his mood, as he seemed to appreciate the quietness of moment and the leisurely of the strokes I was using to massage him. When I got to his scalp he turned over, and grabbed my hand to put on his erect manhood. No words spoken yet, I took the gesture and initiated what I had been taught over the last week. While pleasing my master his hands groped my young flesh, penetrating my insides with his fingers, he was only concerned with what he wanted, as if I was a new car out for a test drive and he was pressing his new gadgets. His soft moans were soon brought to louder heaves of breath and my job was done. No intimate kisses, or sweet pillow talk. He showed his appreciation with money, never attachment. We concluded with a shower and he told me he had some business to conduct. He walked me to the lift and told me go to the next level and my room was the first one on the right, it had an intercom in which he can contact me when needed.

I hit number 5 on the lift and took his directions to my room. I opened the door to this massive loft, the size of an adequate house. I walked down the long hall and my eyes took in the magnificence of my surroundings. It was a room fit for royalty, and later would find out had been stayed in by some. The room was trimmed in gold paint and had another eerie tapestry on the main wall as feature. There was a T.V and a huge king sized bed, with goose feathered comforter and pillows.

All of the glitter from Jeffrey's lifestyle he was offering me finally covered the last bit of sight I had left and I let go of my consciousness. Excited by my enthralling day, not having anyone around to have to act reserved, I jumped into the soft bed and lay looking around, thinking about how quick life could change based upon one swift decision. Dazing

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into the artistry, the intercom buzzed on the telephone next to the bed and it was a housemaid letting me know Jeffrey wanted to see me in his office now. "Already" I thought to myself. I was just getting settled in. I was worried I was going to get lost in this ancient museum, but I got myself back to his office with no trouble, it was kind of hard to miss. I knocked at the slightly ajar door and Jeffrey called for me to enter. I walked over to his desk, where he was just ending a phone call and he opened his duffel bag full of money. "I'll be out at my other office for most of the day, so instead of being locked inside I thought you should go do some sightseeing for the day since it is your first trip to the Big Apple" He didn't count how much he was giving me he just handed me a bundle out of the banded \$100 dollar bills. He knew just how pull the right strings, making me squeal in delight and give him a kiss in the cheek, since we were never really emotionally intimate, it would be odd to act in any other way, but he seemed to like it.

I ran upstairs to get dressed for "City" shopping and put my make-up on, then hit the streets of N.Y.C., looking for a place to start spending this load of dosh. When I got to the end of 72nd street on 5th Avenue. I had no idea which way to turn, left or right. I thought I'd just follow the lights past Central Park and see the local sights on my way. My eyes were once again peeled back in splendor. I had never imagined a place so busy with the hustle and bustle of all the walks of life. My first stop was to buy a disposable camera and I was off taking photos of every wonder that caught my attention. I didn't do much shopping as I had planned too; I was having too much fun exploring this capacious metropolitan.

When it started to hit dusk I began walking back to Jeffrey's but not before stopping off to enjoy a giant slice of pepperoni pizza, it was the best I had ever had, and considering I was going back to Jeffrey's chickpea and tofu salad's or such. I really hated the healthy cuisine served by Jeffrey's personal chef. I was a naturally skinny girl, never watching what I ate and to eat that food I might as well have chewed on hay. I strolled back to Jeffrey's and was missed. Ghislane scolded me "You shouldn't have been gone so long young lady", "We need to know where you are at all times, you are on call for Jeffrey." I started to apologize, feeling guilty, I didn't want them to think I didn't take my job with them seriously. She cut off my explanation with a short conclusion to this conversation "We will get you a cell phone tomorrow, so we can always find you". I thanked her for her generosity, and she dismissed me to my room. So I wasn't even needed after all, it was just a way for her to place me deeper in their control. The next few days I was on call, as Ghislane said I'd be. Venturing out to the city for only an hour or so at a time, I looked most forward to my outings. I would return to Jeffrey's

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mansion to attend to his sexual desires and when he was finished with me, I'd be off to my adventures.

On the day before we were to be heading back to Palm Beach, Jeffrey had a new proposition for me. I could make double the money I was making, if I would look for pretty girls and convince them to come back to Jeffrey's to be further persuaded with money to engage in bi-sexual and sexual acts with Jeffrey and I. I asked him how does one actually propose such a thing to a complete stranger? "Well" he said in a build up to another kind of lesson. "If I were you I would use your charm to entice them and my money to bring them, I would tell them you work for a multi-billionaire who has a taste for young, beautiful girls and with his contacts in the acting, modeling, or rich husband world, your boss could help them. All they have to do is come meet me first." If I wasn't so naïve at the time I would've seen that's exactly what he was doing with me, my prospects were message credentials, but with too much pain from my past, I could only have hope. Not that I was a shy girl, but picking up girls for one reason alone, only to be endorsed for her body, didn't sound like something I could do. But not wanting to displease my master, I told him that I would give it a go. You could tell he was instantly excited with my agreement, he started to reveal the politics of what kind of girls he was looking for. He wasn't into multi-cultural girls, a very chauvinistic perception; he said they had to be uniquely gorgeous to be accepted by him, but definitely no African-American girls, he was racist against anything different to his kind, a very narrow minded way of thinking for such a supposed brilliant man. The list went on and on. No girls with tattoo's or piercing's, or gothics, no drug users, or prostitutes. Basically he wanted everyone's daughter that looked like the girl next door, with blue eyes and blonde curly ringlets. I just nodded and smiled, wanting this to be over with and move on to another conversation, but so worked up from our previous talk, instead he persisted to show me exactly what I was good for to him. He took me up to the highest loft in his large mansion and he lay down on his large bed, expecting me to know exactly what he wanted done. As always, I complied. Part of me hating him for having to degrade myself to be so subservient to his sexual whims, and another part of me was telling myself to be grateful for the opportunities I was being given.

The battles in my head were beginning to cause me too much anxiety, when we got back to Palm Beach, I asked my Mom to make me a doctor's appointment for some headaches I had been getting lately, so she wouldn't question me. I walked out of the doctor's with a prescription for a mind-altering anxiety tablet called "Xanax", not only did it help with anxiety but it also acted as blanket over terrible memories. So when I had to perform degrading acts, I would take a few pills and forget what

happened within the next hour and be able to become someone without a battling conscious.

I spent my sweet 16th birthday on his island in the Caribbean next to "St. James Isle" he liked to call it "Little St. Jeff's", his ego was as enormous as his appetite for fornicating. I was given a birthday cake and a new collection of designer make-up from London. Ghislane made a joke after I blew out my array of candles and said, "I'd be soon getting too old for Jeffrey's taste, and soon they'd have to trade me in." She was only half joking in a sad reality though. A few days after my birthday, a girl was flying out to the island to join us for a few days before flying back to N.Y.C. I was introduced to a pretty girl a few years my senior, named Sarah. She had long ash blonde hair and big brown eyes that hinted she had a cheeky nature. She had known Jeffrey before I had, and he was supposedly trying to help her get an acting job in L.A. She was obviously accustomed to the lifestyle he provided her, making it ever so apparent with her prompt attention she lavished on him. She would do things like strip nude and bathe around the swimming pool, taunting him for sex. She was good at what she did, even putting me at ease with her cool persona and funny jokes. Jeffrey told me privately that she was one of his best at procuring young girls into her entrapment and delivering them to him when he was in town, and when it came to time in the private chambers with Jeffrey, Her and I, it wasn't hard to comprehend. She was devoted to the moment, giving Jeffrey every imaginable lustful desire he could fathom. On the last night there we all took a trip over to St. James to go for a stroll, odd I thought, it was past 7pm and Jeffrey rarely strayed out past then, unless it was some event or dinner party. While Ghislane and him looked the average couple strolling arm in arm through the streets, he said to Sarah and I, "Why don't you two hit the night club here and see if there is anyone interesting to bring back for the evening?" It was more of an order than a request and then I knew why we came out tonight and why Sarah was invited, tonight was all about training, and Sarah was going to show me the ropes in picking up girls. Although there was no one to accustom to Jeffrey's distinct taste to bring back, watching Sarah flirt from girl to girl like a floating butterfly, gave me enough insight into what I was expected to do.

Within Months I had become his handy little helper. Not only would I run to his beckon call, but I also aided Ghislane in bringing in more girls to keep the appetite of our sexually starving chief from going hungry. I once asked Ghislane, why she did what she did for him, instead of having a common monogamous relationship and getting jealous like normal partners would? She replied simply "It takes the pressure off me having to do it". That said it all, we were all under the shade of Jeffrey's money tree, and not even someone like her could escape from its lure.

Just like Ghislane had trained me it was now my job to reiterate that onto other girls and thus the cycle of girls trying to climb the chain of hierarchy would start all over each time I brought a new one in. The sessions rarely differed much. They would mostly start out with Jeffrey on top of the massage table already naked and me leading a girl into massaging him until his instructions came to remove our clothing and if they agreed to that, then Jeffrey knew he had them in his pocket, and could do what ever else he wanted. He was never turned down in the many years I stayed with him. Never being shy, he would tell us to start kissing each other or depending on what he wanted we would perform erotic acts sometimes with him fondling us, or just masturbating while he watched. On explicit occasions, sex toys would be used on us girls, making it all the more exciting for him to observe. Ending with a payment of \$200 for the new girl and \$400 to me for bringing her. He would then wait for us to leave before adding the events details of names and payments in a little black diary he kept with him wherever he went, so if he were in anyone of the city's he lived in, he would always have contacts for sex.

I was slowly climbing the ladder, as Jeffrey was happy taking me everywhere with him, within the States. Merely at home I distanced myself from my family altogether and with Jeffrey renting me an apartment in Royal Palm Beach as well as a plush furnished apartment in N.Y.C, there was hardly a need to see them. I just couldn't face everyone thinking they all knew what I was really doing travelling around with a man old enough to be my grandfather who supposedly only wanted me for massages. Much further convincing myself of the lies I told myself, I took a liking to the Xanax, it felt like it was all a dream at times, even meeting up with old contacts from school years who experimented with drugs. I was flying around the country, seeing so many places in America I had only heard about in Movies and making more money than anyone my age and loving it. My friends didn't believe the lies I told them about only being a massage therapist, some of them even asking if they can meet Jeffrey too. At this point in my life my heart went missing for a while and I stooped so low, I was even bringing my friends, I just saw them as easy commission. When I wasn't playing servant to my master, I was partying hard, eventually using ecstasy pills, acid, and marijuana to disillusion the times I would've had away from Jeffrey to think about what I was actually doing with my life. I realized something one day while I was alone, although I had Jeffrey to attend to sexually, it was not gratifying. I needed someone to come home to, someone I could call my boyfriend and that showed me emotion not just a job to get done.

Chapter 7

A knock came to my apartment door one lazy afternoon while we were in Palm Beach. I looked through the peephole and didn't recognize the once familiar face. I asked from behind the closed door "Who is it?" The voice of the reply was one I wasn't anticipating to ever hear again. It was my Junior-High crush and childhood friend, T.J. The last time I saw him I was a runaway and he had let me stay at his house for a few days, telling his parents nothing, he kept me hidden away in his room. At nightfall he said to knock on his window and I could jump through and stay the night. Until I was picked up by authorities during school hours and questioned why I wasn't in school they did some resourcing finding out I was a runaway, then delivered me back to my angry parents.

"Oh My God- You finally answer your door girl", and in a whirlwind, T.J stormed back into my life. Even moving into my apartment, secretly, within two weeks of his arrival. He had changed so much from the last time I had seen him. He used to be this hard looking rocker type, now he was cleaned up wearing preppy clothes and shooting out Tupac Lyrics. He had the same old big brown eyes though, and when he told me he had heard I was back in town but he was unable to ever get ahold of me he just kept knocking at my door every so often, I was sold. How sweet I thought, he must care about me if he was so intent on approaching me, not even thinking he would've spoken to the girls from our junior-high circle and they would've mentioned him I was back in town, what I was doing and where to find me. We were a drug-induced romance, which budded from fake emotions the affects made us feel. He got what he wanted, a free ride and not having to work, and I got what I deserved, a man who could let me go away with this multi-billionaire I regarded as my second boyfriend.

I didn't want to alarm Jeffrey in me having a boyfriend so I kept it quiet, until during a massage I was giving to him one afternoon. We were having a conversation about some of my friends, the party girls I had brought in to meet him. Jeffrey started asking questions about the different types of drugs they used hearing them speak about it in his presence. "I thought a person on drugs would be all strung out and looking like hell, but the girls you know look great" he stated face down during the massage.

That's when I told him I had been dabbling in ecstasy lately too, and I thought it was the most amazing feeling one could even fathom. I tried to describe the euphoric feelings it gave me and even joked with him about wanting to pet anything furry that was around and then there was the constant need to flick my tongue-ring around my mouth. It was great

having such an open conversation about things Jeffrey had never experienced before and he seemed okay with everything I was telling him as we were having a good laugh together, so I thought I could push it a bit further and tell him the truth about T.J. since it was bound to come out sooner than later I'd rather not the latter, when it would look even worse that I kept the truth from him for so long.

"Well why were opening up about things together", I continued by saying "I had met someone from my past and we have been hanging out a lot lately. When I haven't been travelling with you I have been with him and I was wondering if you minded if I started to see this guy." He started to laugh out loud, "Are you serious? Of course not, no one in this world is monogamous, why would I expect you to be?" I was smitten with relief, but a little bit disheartened when I heard him speak that way and I wondered to myself if he'd had his own personal encounter with heartache.

Of course the evening concluded in the same way it always had, the only reason I was really even there in the first place. Upon his request I straddled him on top of the table and let him explode with pleasure inside of me. Thinking the entire time about T.J. I felt so terrible but I quickly had to wipe the thoughts of guilt from my mind not to give Jeffrey the wrong impression. So I had myself busy with two men in my life, but that's not what I really wanted for myself. I wanted an occupation that would eventually set me free from depending on a man as my source of survival.

I asked Jeffrey before I left for the evening, when my real training was going to begin and he liked my assertiveness. I thought it meant to him that I was taking my job with him seriously, but it was all part of his master plan to keep me by his side. Within a couple of weeks of my persistence, Jeffrey introduced me to a couple of real working massage therapists, not only with credentials but with their own clientele too. I was in awe of their teachings, it all made so much sense about the body and what they were saying. I felt like I had picked myself up out of the lurches and had a direction again.

I was in the middle of another training session, with Jeffrey the recipient as usual, being it was rare for Ghislane to ask for a massage unless of course it was for Jeffrey's own pleasure to watch the punch line of the session, when I was shocked to hear Jeffrey ask one of the therapists to now remove her shirt. He had no shame I thought. Even though she was above his usual age criteria, she was still a pretty woman in her early 30's with curly blonde hair and had an athletic body for a mother of two children. She didn't hesitate in his request. It looked like something out of a role-playing porn scene with the therapist removing

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her white uniform to reveal her beautiful nude body and a much darker side to her personality.

I couldn't believe it at first it was such a state of shock and I began to question myself if this was normal in the massage profession to expect this kind of clientele to request such degrading tasks even though they were professionals. At the end of the session she was paid \$300 dollars an additional hundred for helping to train me as well, and I was paid my usual \$200 dollars then we were both invited by Jeffrey to join him out by the pool for a cool dip. With Jeffrey making a few phone calls while her and I undressed again for a swim, I wanted to ask her a few personal questions about what she's come to learn about the Massage Therapy game, but I never got the chance as we were joined by Ghislane moments later. She was asking how my training was going and booked the therapist in for herself in the following morning. Where she was invited back to do another training session with me. It didn't take me long to figure out why.

I was at my apartment when I received a phone call from Jeffrey. I thought it was the usual call to come over to his house, but he surprised me. Instead I would be going to the exclusive hotel in Palm Beach tonight, The Breaker's, where I would be meeting my first ever clients. Only told their first names I was given some instructions and the address where to meet Glen and Eva. They were a married couple with one on the way. I was quite concerned when I heard she was pregnant, being I really didn't know the body that well and didn't want to inflict any wrong doing on the unborn baby but Jeffrey insisted I take this job. Just massage her gently where she wants to be rubbed and to save all of my energy for Glen's massage, since it was going to be a four-hour job. In an emphasized tone of voice I was being coached by Jeffrey to treat Glen with exactly whatever he wanted, just like I do for Jeffrey himself. It was my last bit of preparation before he sent me out to his friends and my first taste of responsibility in upholding his reputation.

At around seven pm I took a taxi to the address I was given and found them on the residential side of the giant hotel's extensive property. When I arrived in their apartment it was a far cry from the lavish place I was expecting, still really nice but had a cozier family feel to it. It was just beginning to get dark when Eva and I went into the Master Bedroom and she undressed to reveal the first naked pregnant body I had ever seen. It was fascinating to see her in the later stages of maternity, and strangely enough it was a miraculous and wondrous sight. She was a former model and one of Jeffrey's many encouragements from his past that had gotten to old for his taste and was married off to a wealthy colleague of his.

Lying down on the bed I adjusted the pillows to try and make her more comfortable and I began to massage her as Jeffrey had instructed me to,

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softly and slowly. So at ease with her nude body she even asked me to massage her swelling breasts, in a non-sexual way. Not knowing any other way but that way, I was trying to oblige in her request doing the very best I could to relieve her but couldn't help but giggle to myself at the very sight of this. She said she was very happy at the end of the massage and rolled over to go to sleep, asking me to turn out the light at the end of it. I closed the door gently as if not to disturb her, and went to find my other client.

The apartment's lights had been turned out for the sleeping children and I found Glen awaiting for me in the lounge room where I had to call out "Excuse me?" as I couldn't see him in the dark. There was a throw rug on the ground that he had already placed out as he began to strip down in preparation of the massage. Lying forwards facing me with his exposed and ever growing manhood, I asked him to roll over to begin the massage. He complied with a cheeky smile and from his eagerness to show he was not shy indeed, I already knew where this was going to end up.

I found it much more strenuous to massage on the floor but I wouldn't let that hold me back I wanted to have a career and this being my first ever clients, I didn't want them to disapprove. Nearly four hours after I had gotten there I was still hard at work. Mentally preparing for the end of the session he let me know when he was ready to begin the other side to my job and just like Jeffrey did the first time, he requested me to take off my clothes starting with my shirt. When I complied, the requests kept coming in and before I could change my mind and run away, I was having intercourse with this man that was so comfortable doing all of this while his pregnant wife and children slept in the room beside us. When he had climaxed, we both got up and dressed and he paid me a large tip even though Jeffrey would be the one to actually pay me for my time spent there. Just like it had all started, it had also ended so quickly and now that was that. I had to accept what my duties were and now I could go back to Jeffrey who would be further pleased in my demonstrations to keep him happy.

I was called the next morning to come over to Jeffrey's mansion that afternoon for lunch, a swim and of course a massage session. Knowing all too well they'd be expecting the gory details of last night's events with my new clientele. I came there at 1pm as requested and sat down for a light lunch and a swim. Jeffrey was mostly conducting business from his offside pool office, but he came to ask me if everything went well the night before. I told him I did everything asked of me and I am quite confident both my client's were more than pleased with me. He gave me a quick grin, before he headed back to the office, throwing a purple grape down his throat as he walked away.

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Lying out on one of the pool decks blue and white striped lounge beds I was waiting for Jeffrey to finish his business so I could give him his massage. He never took too long with his work, unless there was something wrong and then we would all have to wear his mood but today he seemed fine though, when we went up the stairs he told me we would be leaving for his ranch in Santa Fe, New Mexico in the morning and I'd need to be packed and ready tonight. They loved leaving in the spur of the moment, Jeffrey once said he checks with his pilot Larry on the best weather before he heads to a different destination. I enjoyed spending time at his ranch being it was my favorite of all of his residences. He had a lavish Mediterranean looking castle on top of a hill that over looked his extensive 7,500 acres of property. It has an indoor pool, gym, and all the trimmings of extravagance I could only imagine. I had a great time on the quad bikes, Sarah and I often got scolded for tipping one over going to fast or trying to go up a steep hill, but we knew those weren't the things he cared about, so it wouldn't matter. My favorite of it all was his little town with it's own fire station and truck, stables full of horses, and little cottages where the housekeepers and ranch hands lived.

On my own time I would take one of the quad bikes down to the stables and saddle up on one of his beautiful horses and go for a ride in the open terrain. It was coming up to the end of a very cold winter and it still had the snow covered mountaintops and brisk air that I loved to take in during my many trail rides. I have been an experienced horse rider since my childhood, and could honestly pinpoint some of the best memories of my life being on the back of a horse. I acclaimed with thrill in my voice "Great, I'll get packed as soon as I get back to my apartment" he threw in "Pack for a few weeks, as we will also be making a pit stop to L.A for some business afterwards and then to N.Y.C." I was used to these round trips with him, it was great as I was saving loads of cash and about to buy myself my first car.

Jeffrey, Chislane, Emmy and I all left the following morning, as planned. Arriving in only a few hours at his awe-inspiring Santa Fe Palace was always a delight. Still frisk in the air, my petite frame looked even smaller in these gigantic overcoats. Nonetheless I was looking forward to spending time out in the fresh clean air and open land. After a few days of leisurely spending our time on the ranch, we went to the Indian markets in Albuquerque for a bit of shopping and sight seeing. Jeffrey wasn't the most off road kind of guy, so when we went sight seeing it was more like museums, boutique shopping, and local art galleries. Still a splendid trip though. With me picking up a few nifty collectables to bring back for my family and knowing how much my mom loves Indian apparel, I thought it would put me back in her good books for awhile, I hoped at least. There was some lengthy time to put a

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little water under the bridge between my folks and I. With my life heading in a different direction I didn't see any use in holding on to so much hate especially that I didn't even have to see them that much.

We got back to "Zorro Ranch", the name Jeffrey chose to call the massive land he bought to build his fortress on, and Jeffrey told me that he was looking forward to one of my famous relaxing massages and with that notion he gave my bags of shopping to one of the many housemaids who greeted us at the front door and asked her to bring my bags to the exquisite room I was staying in. We headed straight downstairs just past the massage room and gym there is an indoor heated pool, shower and spa. First Jeffrey wanted to warm up in the spa underneath a decorated ceiling of clouds and blue skies. Starting the massage in the spa I rubbed his feet while he reclined into the spa's jets. We spoke of the museum and some of the knick-knacks I had bought and I thanked him for the turquoise earrings and necklace he had got for me as a gift, joking about not ever knowing what to get for him, being that he was richest man I'd ever known. By no far means did we ever have any kind of a mutual respectful bond between us, but there was a significant softer side he began to share with me that was different from how he treated his other girls. Maybe it was my feet that filled the shoes for that time being, or the fact my novelty hadn't worn off yet, but what ever it was I was getting confused from the double-sided life I was leading.

He got up from the spa tub shortly thereafter and asked me to come wash him in the shower. It was nothing ordinary to me, I was used to his need to be nurtured and pampered. I performed his request with a cheerful mannerism, letting him think I was taking care of him out of my sheer sweetness. I got the towels ready for him to get out of the shower and towel dried him, patting his skin instead of rubbing as previously instructed. "You know you have a very maternal instinct, you'll make a fine mother someday", he would constantly acclaim at my gentleness. "I hope so" I replied, I would love to have my own babies one day, but not any time soon". Laughing at the very thought of that.

We walked up the steps and through the French doors into the gym's adjoining massage room. It was smaller room than in his other houses, placing the emphasis on the large massage bed in the center. I grabbed another clean towel to keep him warm while I prepared the music, lights, and oils. He liked me to use mostly lavender or other aromatherapy scents, which reminded me of woodlands in the spring. Always enjoying the beginning of the massage, I put my heart and soul into training in my profession. I could just close my eyes I would see only with my hands the areas that needed the most work, and even though I wasn't a professional yet, Jeffrey could feel and told me there wasn't many that could please him during a massage being untrained. I'm sure now it was just

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something he'd say nice to all the girls, but in the time I had known him I could honestly say it wasn't like him to compliment girls in any other way than regards to a sexual performance or their looks. I was flattered at his praise and when the massage was over, so were the sentiments. I was back to being used for my body and what I could do with it.

With him satisfied and off for a nap, I could go do what ever I wanted, like usually I would go down to the stables or something adventurous, but today I was in a melancholy mood, just wanting to relax and unwind myself in a giant tub in my bathroom. I got out some of the oils I used on Jeffrey putting them in the steaming water and popped two of my Xanax pills, forgetting about my troubles and focusing on the quiet moment at hand, just wanting to soak up the peacefulness of it. Nearly slipping away to sleep in the tub, I was startled when I got the call on the intercom to come down for dinner.

Everybody seemed in good spirits at dinner, which helped to lift mine. We all ate our meals and went into the movie room to watch a newly released movie. It was a ritualistic scenario, most nights that everyone was at ease we would all sit in one of his various located movie rooms and hang out together. Just as he always would Jeffrey asked Emmy and me to both grab a foot during the movie that night and just keep massaging through the film. We were always on call for duty, no matter where we were or what ever time it was. He would just plop a foot up or pass over his hand at any given time and require a massage, even if the film went on for over two hours, I would still be required to sit on the floor rubbing his feet or hands, and even his scalp at times. After the credits had rolled Ghislane got up to close the door to the room and I knew she had received the signals herself and would proceed to manipulate, violate, and use us to satisfy Jeffrey's urges once more before he went to bed.

The blue illumination from the empty T.V screen was glaring in the tenebrous room as we watched her undress in a light that relied on the reflection of the moon through the windows peek to show it's proceeding display. She walked back to the sofa where I was sitting at Jeffrey's feet still rubbing away and uncovered her shirt displaying ample bosoms for his appeal. Approaching me like a lioness hunting her prey she stood me up and led me to the other couch across from Jeffrey and situated herself on top of me, sliding her fingers through my dress to unbutton my attire, revealing my girlish figure and two small peaks. Pushing my head into her breasts I was being fondled by Emmy at the same time, which took her cue when she saw Ghislane look in my direction. From an occasional glance upwards, I could see that Jeffrey was up to his methodical foreplay stroking his manhood while watching the build up to his main event. They both took turns making me moan from their touches and when

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Ghislane was ready too she would insinuate we do the same to her. She urged me downwards, until my head was between her opened legs and giving into her wanton indulgence. Twenty minutes passed before Jeffrey exerted his last energies for the night, the only advantage of being with an old man was they could never last long.

Departing to our own separate quarters for the night, I called T.J for condolence. It was so important for me to feel like I had someone out there who saw me as more than a pretty girl with vulnerabilities. I needed to maintain some sort of a connection to my youthful side. But it would be to no avail as I was getting used to being badly disappointed by all the men in my life.

Chapter 8

The phone nearly rang out and as I was about to hang up the receiver when he finally picked up. On the other end of the phone I could hardly hear T.J above the background noises. When I asked where he was he told me "At our place baby", meaning the apartment Jeffrey had rented for me to be staying in alone. He already sounded off his chops elongating his words and slurring his speech. There was music pumping and people shouting behind him and every one sounded like they were having a great time. I was so sick of his friends coming over using my house as a place to party and then trashing it so bad I would even have to sometimes throw my furniture out. I blew up at him over the phone and threatened to kick him out, back to his parent's house, so much for my relaxing evening I thought to myself venturing on to tell him "You leech off me using the money I leave behind for you for drugs and throw these gigantic parties while I'm away." Also mentioning the disastrous messes I would come home too. "I am so close to ending it with you", I would openly threaten, but he knew better than I did, that I just couldn't bring myself to do so, needing some attachment to my youth through all of this. "Don't worry baby" he would say attempting to soothe me with his false words going on to tell me how much he was missing me and how he was always thinking about me when I was away which was like all the time. I would soon be buttered up and soft for serve. This was my penalty for choosing a guy that accepted my lifestyle with my "Other-Man" as I had so eloquently put it to him once as not only acceptable but deemed it "Cool". The conversation ended with an easy good-bye and no "I-Love-You's" or anything sweet. We weren't those kinds of partners yet, so much time spent away from each other and the lifestyles we both led, I couldn't expect much more from him than what we already had.

Jeffrey and I left two days later, heading off to Carmel in California for a business trip of his, leaving Ghislane and Emmy to catch a commercial flight back to N.Y.C., where we would meet up with them later. When we arrived at the hotel we were given badges for the meeting tomorrow and settled into our rooms. We got adjoining rooms, keeping the doors open at all times, but sleeping in different beds. He liked sleeping alone, even after a late night session I would always go back to my own room. I think that's why he liked me so much I never put pressure on him to become intimately more than what we were already, never giving him the impression I wanted more than what we had. It seemed to keep him happy just the way we were together. I hung out with Jeffrey that night, going to a restaurant for dinner and afterwards watching a movie back at the hotel.

The next morning we went for an early morning breakfast before the conference and Jeffrey gave me some money to go shopping instead of attending the all day meeting with him. I was more than obliged to accept his request, and wished him a good day before planning to meet back in the room around six pm. He gave me five hundred dollars. He said it was just enough to go have fun for the day and a girl of my means could find plenty to do with that kind of money. I walked around the many boutiques that lined the streets of the picturesque cozy town, and picked up some bits of clothing here and there and even met a girl who was passing through on a road trip. She was somewhere in her late teens with golden sunshine tresses, olive skin and blue eyes. Her name escapes me, as it was so unexpected, I think it was Tina or something like that but she was your typical California carefree chic, offering me a few tokens of her joy as we ducked down a side street together. I was so happy I had met this girl, as she was fun spirited and charismatic a relief from the social expectations I had come to know lately, but always being "on-call" as I had been trained up to be, I ended up inviting her back to meet Jeffrey at our hotel later on as a surprise for him. Maybe she was just a bit too carefree for Jeffrey's taste but anyhow she was pretty enough to let him be the judge of that matter.

Over the next hour of hanging out together I found out that she was on a road trip with her best friend who was still sleeping off the hard night of partying from the night before. She was originally from the southern states as she had a bit of draw still left in her accent, and she had recently left her boyfriend because he was leaving for a college too far away not believing in long distance relationships. Then it was my turn to dish out my contribution to the conversation of getting to know each other better. I always got anxiety before I would tell a girl what I did for work and romance (as such), morally I was ashamed of who I was especially with a girl having led somewhat of a normal life. Next, as always, I expected to

be probed with so many more questions and having to make Jeffrey sound ideal and hot for the taste of a young girl and knew I would be point blank lying, so I told her some of the truth which was that he was really rich and paid good money for a massage and useful to have around as a contact. I told her he'd give her two hundred dollars for a two-hour massage with me leading the way and warning her he was known to be frisky during the session. Unexpectedly she said she could use the money and then came the part that I hated the most, but had to do so they wouldn't be as shocked as I was the first time I had met him. "He does like us to be nude though and sometimes asks for more than just the massage itself". All I could do was wait for a response after a shocking sentence like that, and depending on the girl, most were sadly taken back by the money. Her carefree attitude seemed to disillusion for a moment when she gave it some thought and asked me "He's not like, fat and ugly, is he?" "No...no...not at all" I replied, "He's got more of a Richard Gere appeal to him". Trying to make him sound a little more measurable than just a rich old man that likes to be with girls younger than half his age. "Well then, what time shall we meet tonight?" She asked next. Great, I thought, Jeffrey would be most pleased with my find. "Knock on my room quietly, you're going to be a surprise. Be there at around half past seven tonight and I will introduce you to Jeffrey". She threw the butt of the second jay we shared in the bushes and we strolled into a homemade fudge boutique to get some relief for the munchies we now had.

When I got back to the hotel at around a quarter to six o'clock pm as requested I'd be, nobody was back yet, so I took the time to set up the oils and bath in my room for his massage tonight. I thought I would plan it so the girl would be cleaning off, as Jeffrey liked before he had sexual contact with a new girl and he could walk in and be surprised to find a strange beautiful girl in my room who wanted to massage him. Jeffrey walked through the door not long after I was done prepping for the night ahead, looking like he had a rough day at the office, which was very rare for him. He sat down on the bed and I asked him how his day was. He didn't want to talk much about it, saying it was boring and long, rather asking what I got up to for the day. Being coy about having a jay and his unexpected surprise to come, I told him it was a great day of shopping and sight seeing and I even brought him back some local made fudge from the shop that had fulfilled my chocolate cravings only hours ago.

Telling him of the places I ventured into I mentioned to him "We'd have to hit the fisherman's wharf tomorrow. I saw some locals walking around with breadbaskets filled with creamy clam chowder and it smelled absolutely scrumptious." He said if the weather were nice we'd check it out tomorrow before we left for L.A. He wanted to take off his jeans and

collared shirt and put on his normal attire of sweatpants and a sweatshirt. Ushering him out the door for dinner when he was more relaxed I was lucky when he said he was starving and quickly got dressed. We just found a quite spot to eat that was next to the wharf and got back to the hotel just in time for our surprise guest. He wanted to go have a shower and settle down for a massage, so I told him I'd join him in a minute. I just had to make a phone call real quick which he thought was odd and asked me if everything was alright, I reinstated that I'd just be a minute, trying not to let on about anything. The knock came quietly on my room's door just on time, as we had planned and I told her my idea to surprise him. I let her into the bathroom where she orchestrated my plan perfectly. Jeffrey finished his shower without me and when he called out for me I told him that I needed him to have a look at something in my room real quick. Not giving in to what it was that he would be looking at, he came into the room where I opened my bathroom door to reveal a beautiful nude girl bathing in a thick amount of soap bubbles in my tub looking at him with an alluring intrigue. His grin went from ear to ear when she stood up and introduced herself letting the bubbles run down her glistening body at an ever-slow pace. It was a proud moment for Jeffrey, I had done well in his eyes, and she was not like the other girls I had brought to him before, degraded from a lifetime of abuse off the streets. This girl was exactly his pro quo looking sweet and innocent as the girl next door. My efforts were to show him I knew that my only responsibility was to keep him happy at all costs. I led her through the massage on Jeffrey and of course afterwards gratifying his perversion with his lustful requests to be fondled and watch us become more than just friends. I didn't feel too bad at the time with his coercion providing many financial rewards making his scheme enticing to a young, impressionable teen not realizing the terrible memories left to come from all of this. Afterwards he paid her the usual two hundred dollars he gave to everyone for their time and took down her name and phone number writing it in his infamous little black book of the contacts he met in every city but only the ones he really liked made it down in his records.

We went out the next afternoon as I had suggested last night and we ate our clam chowder breadbaskets over looking the wharf's bay, watching the seals playfully barking at each other on the rocks nearby. Shortly after we were driven to the private airstrip and took off for Los Angeles. On the plane was an unexpected visitor, Matt Groening the producer of the "The Simpson's" T.V show was catching a ride with us. I was so excited, as I loved watching his show and acted like a star struck fan, asking him everything from his initial idea for creating the show to where he got his characters from. He told me it was all based on his own family make up,

but without the crazy father and son scenes of Homers hand around Bart's throat.

I was enjoying our conversation, when Jeffrey insisted that I give Matt a foot massage throughout the duration of the short flight. I never turned down a client but when I saw the shape of his feet, I nearly threw up at the thought of having to touch them. He had yellow crusty toenails that even someone with a chainsaw would've had troubles cutting through and then there was the fluffy balls of leftover pieces of sock wedged between the crevices of his sweaty toes, now that was the real icing on the cake for me, no way could I attempt this I thought. Then I had an idea. I went to the back of the plane and rinsed a wash cloth in warm soapy water and returned for his dreaded foot massage but not before attempting to clean them first.

In return for my services Matt was kind enough to draw me two quick sketches on blank paper from his briefcase of my two favorite characters, Homer and Bart. I asked if he would make them out to my little brother and dad, the true fans of the family not missing an episode during dinner over the past ten years or so. Next to the A-4 size drawing he was able to fit in the quote "To my greatest fan from Matt Groening" and their names next to it. I knew they'd absolutely love it, and it was such a nice gesture his feet were no longer an issue as I laughed it off and even made a joke to the comedian about getting a pedicure before hitting L.A.'s beaches.

The flight was only short and we arrived in busy L.A within the hour, saying Good-Bye to Matt, who was a pleasure to meet. Jeffrey had a meeting at a production studio for one of the girls he was keeping lured in his grasps, so we were off yet again for more business. We were staying with one of his old girlfriends, Jeffrey's code for "She got to old for my taste, but was still nice enough to keep around". She was a tall blonde with blue eyes, a stereotypical Barbie doll. In her younger years she had been a successful model and now lived on the beaches of Santa Monica with a sweeping view of the oceans landscape as her backyard.

The next morning Jeffrey and I went out to breakfast. He said Sarah Keller, would be joining us with another one of Jeffrey's girls I hadn't met yet, her name was Nadia Bjorlin and she was a Yugoslavian model turned aspiring actress, with the help of Jeffrey, as he so proudly remarked at the table before they arrived shortly thereafter. She was a stunning brunette with olive skin tones and shocking blue eyes. By far one of the most beautiful girls I had ever met before. She and Sarah approached the table, shopping bags in hands already in the early hours of the day. They both pulled out a chair and showed us their new pair of Jimmy Choo's they had bought on their way here this morning, and excitedly asked for Jeffrey's opinion. He loved the dotting attention and anyone who could make him feel important. We all went back to Sarah's

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apartment that Jeffrey rented for her on Malibu Beach. This was the first time Jeffrey came to visit and when we got there you could see why. It was a tiny one-bedroom shack, too small for his likes of accommodation, but she loved it and it was plain to see why, the waves lapped underneath her porch twice a day, what else could anyone want. Before even walking through her door, you could hear the commotion of excitedly screaming females voices coming from inside. There were about five other girls in Sarah's living room and she had invited them so Jeffrey could have a few different girls to choose from. Jeffrey looked at Sarah and smiled, aren't you sweet, as all the girls rushed to introduce themselves, hoping for the opportunities Sarah had offered them to come in the first place.

We all had some coffee and biscuits while the conversation kept getting louder and louder, every girl trying to talk over the next one. Jeffrey could handle only so much of that before getting too annoyed. Instead of choosing one of the other new girls, Jeffrey wanted Sarah to show Nadia and I into her bedroom. He was anticipating the introduction of his two favorite girls together, what mischief he had hoped we would get up to was apparent when he asked where Sarah had kept her play toys and not the fisher price ones. Sarah brought out quite a collection of her personal toys and was giggling on her way out as she shut the door. Suddenly the room behind us went quiet, probably hoping to catch a moan or groans too laugh at and I felt so degraded having everyone knowing exactly what was going on. Knowing my duties well I was baffled this time as there was no ritualistic massage wanted. He immediately instructed us to start kissing and fondling each other with the provided toys straight away seeing his excitement grow watching us try and out do the other one with pleasure, he couldn't keep restraint any longer and started to have intercourse with the both of us, taking his erect penis out of the other to only swap to the other girl, back and forth. This continued for a good fifteen minutes or so while we continued to engage in lesbian acts on each other while the other girl was being subdued by Jeffrey's thrust's of penetration. Nadia was just as dutiful as I was in fulfilling his demented requests, willing to lend her body to Jeffrey and those he sent her too, for the sake of keeping her acting career and putting on a good act at that. She was never competition though. Once I found out where she actually came from I took pity on her for the similar life of servitude we were both accustomed too and not that we ever became good friends but we had reason to relate to each other.

Later on Jeffrey, Nadia and I went to a production studio in L.A, where we had to meet with Nadia's agent as well as the producer of "Day's Of Our Lives". The meeting lasted five minutes, with everyone in consent to the proposal. We flew all the way out there to talk about money, only to be leaving that evening back to N.Y.C. On the way to the airport we

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stopped at a fifties looking diner and got a cheeseburger and vanilla milkshake, the first and only time I saw Jeffrey eat what I considered to be real food. Seven lanes to drive in and the freeway was still lined bumper to bumper in the heavy rain. The sound of downpour on the rooftop of the taxi and the rhythm of the windshield wipers was making me sleepy. I was looking forward to sleeping through the long flight back. Thank goodness we had a private jet to catch back, the trip would be comfortable and not rushed to get there on time through the daily peak hour traffic. Jeffrey asked me what I thought of Nadia, more of a kiss and tell kind of thing for him, so proud to admit some of his tenacious acts of pedophilia to me that I knew most people would be embarrassed to even think about but I said what he wanted to hear when he asked me what I had thought of her on the way back. I replied, "She is attractive, funny, and seems to know what she is doing with you." Laughing at my statement, he then started to tell me the history behind where he got her. Five years ago when she was merely a teenager just turned thirteen. Her father had recently passed away, leaving Nadia's mother in a tremendous amount of debt and living in a third world country, she didn't have the means necessary to raise her own daughter. When Ghislane approached Nadia for the first time at a music school, she seemed like a maternal, caring stepmother. Telling Nadia's mother if she let Nadia go with her, she would see to it personally that Nadia receive the best education and chances in life to make it. In her customs it wasn't odd for a young girl to be married off to bring the family good fortune, so she kissed her baby girl good-bye and sent her off to commence her life of servitude. I sat there speechless listening to Jeffrey brag about his endeavor to get her over here, shocked that he could stoop as low to use a barely teen to oblige his sexual desires. He was laughing and giddy as he replayed the memories of her arrival over in his head, painting me a horrific picture I had no choice but to imitate a smile to face him with.

No pretty girl is safe from the allurements of these villains procuring the youth off of every street in the world. I knew that day more than ever before those morals did not exist for people like this. Jeffrey once told me that every girl he has had sexual relations with has benefited in their career, finances, or an achievement in marriage with a successful colleague of his. Mine was the massage career, ever so often still giving me a lesson from a professional, which kept me quiet for a while longer. I thought I was already knee deep in this world, if I gave up after putting myself through all of this hell it would've all been be for nothing. So I treaded lightly, constantly at a risk of being replaced by another willing participant and playing the eager student he wanted me to be.

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Chapter 9

We met Ghislane and Emmy in N.Y.C. and it wasn't a blissful reunion as I hoped for, wanting a break from all of this I was just looking forward to getting back to Palm Beach, not leaving for a further four more days. I got home late in the evening as Jeffrey invited me out to the movies after we had relaxed at his house for a while after landing.

I put my keys through the door to my apartment and walked in to a quiet house. Not thinking anyone was at home I set my suitcase on the floor and put my cell phone on charge as I always did to be accessible for whenever Jeffrey or Ghislane could call. I went to get a drink out of the fridge when I heard some noises coming from the back of my apartment where my bedroom was. I started back there and slowly turned my doorknob to reveal T.J. on top of another girl. When they noticed they weren't alone anymore, T.J. got off her with promptness. I recognized the girl from seeing her around at parties, and she was the town lowie, scattering her trail of guys along with her presumable diseases, and I wasn't shy to verbalize that when she tried to open her mouth and calm the heated situation between T.J. and I. She didn't like her cards on the table in front of the guy she was screwing around with and got up in a fit of rage to attack me. Still nude with only my new white sheets to cover her body, I threw her out of my house along with T.J. "I have been paying your way for months, only finding out your sleeping with the biggest slut in Royal Palm Beach, at least have some dignity and higher your standards." I didn't really have a leg to stand on since I had started this relationship giving him the knowledge I had a sugar daddy to answer to above him. "You're gone all the time and with that old man, what did you expect me to do?" He was right, I wanted what I couldn't have, but I needed some time to cool down and accept my situation. I loved having T.J. around to come home too, and he used to be my best friend in my school days. I convinced myself of the lies I continued to accept.

Days later I was still not speaking with T.J., mentally adjusting to my circumstances, I thought I'd have the day off to relax since I hadn't been called all day. Until about five pm when Ghislane called and said Jeffrey would like a massage in an hour. Grudgingly I got up from relaxing on the couch, got dressed and put my make-up on, meeting Juan downstairs a half an hour later. Jeffrey was already lying on the massage table when I walked in. I started the massage being very quiet from my somber mood, when Jeffrey picked up on it and said "you know it's not good to massage people when you're angry, you could pass on negative energy." I wasn't sure if he was serious or just trying to be nice so I could speak about what was bothering me. Ending up not being able to contain my

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emotion any further I told him what happened with T.J and broke down in tears, a little heart broken from living in such a lie. He turned around from his massage and sincerely paused for a second thinking he was going to console me but instead he laughed at the very prospect of my notion that monogamous relationships ever existed. "Are you serious, he was only doing what every guy in the world does, you can't hold that against him". I replied in a lighthearted gesture "whose side are you on anyways?" His answer stuck with me for many years to come "I'm on your side which is why I'm going to save you a lot of grief with this one tip. Never expect a man to be faithful and you'll never be let down, it's just the way us men are genetically imprinted." The remainder of the massage I had to pretend like I wasn't further saddened by his response, but in fact having to act enlightened. I would never come to him for any other relationship advice, ever again. He told me I'd be fine if I just listened to my mentor. He still loved role-playing the teacher and me the pupil, like the old days before he got rich and only used to be a college professor. I finished the massage and fulfilled my sexual duties before being sent home wanting to collapse in anguish.

T.J was outside my apartment door when I got there, his mom waiting downstairs in her minivan just in case I kicked him out again. He pleaded his guilt and promised that he would never see her again, agreeing with me that she was the town slut and he screwed up big time. I let him back into my apartment and back into my life for that matter but more aware of the world I was being led into believing was of normal conduct accepted by everyone in this sick world. Jeffrey was going back to N.Y.C and told me to have a few days off before his assistant at his office would arrange an E-Ticket on a commercial flight for me to join him later in the week. I had just made loads of money from my previous trip and wanted to relax like any teenager does, so I threw a hotel party that weekend on Singer Island in Rivera Beach, inviting only a small group of friends to begin with.

The hotel room quickly filled up with a flood of teens and the pumping music was blaring. The room had a balcony overlooking the pool and the beach that became the smoker's section. I wasn't a real smoker at that point, preferring to have a puff of a spiffed blunt instead so I made it my rule to go outside trying to prevent holes in the carpet, but it didn't last too long when our forbidden walls came tumbling down. Making so much money that I could supply my wild parties with an assortment of drugs like trips, ecstasy, and coke as well as an abundance of alcohol, that T.J had all the contacts for, made my fellow teens admire me. It definitely gave me a head swell, thinking here I was so young but so grown up already with all of my peers from high school looking up to me. In the wee hours of the morning we were all still going hard with our eyes

dilated into little black diamonds. We were all having in depth conversations about life and where we would all end up when this charade was all said done. Nobody got to sleep that night as the room slowly dwindled in numbers as people were finding their way home to recover from the repercussions of drugs wearing down out of their intoxicated system.

When I flew out to N.Y.C to meet Jeffrey the next day, I was still in a horrible state. Not knowing what was wrong with me, thinking it was just a bad come down, I rushed out of the elevator and down the hall to my room, sweating profusely, to make it just in time to the toilet to throw up bile again for the uncountable time since getting off the plane. I was having intense cramps in my stomach and when I was called down to meet Jeffrey in the massage room, I had to decline for the first time. I told the housekeeper that I was feeling very ill after the flight, maybe some off food for lunch and needed to lie down for a while. Nobody came up to check on me for hours or even called. Waking up from my much-needed nap, I pulled back the expensive white sheets to find myself in a pool of my own sweat and blood. I was covered in the red stains that drenched the pants I was wearing. I had no idea what was going on, I could only focus on the dire amount of pain I was in. In between the heavens of throwing up and crying simultaneously I was able to reach the phone and called the housemaid on the intercom. I told her I needed to go to a hospital immediately and slammed the phone down only to fall back to the floor hurdled in a ball. She didn't hesitate in calling Ghislane who ran up to see what was wrong. Ghislane then called Jeffrey who was in his office at the time and told him to hurry up to my level, stressing to him that it was an emergency. Thinking they really cared about me for the first time since I had known them, they came with me to the hospital with me. Now I realize I was only a liability in getting them caught and they needed to get to the doctors before I could say anything incriminating. They were suspecting the worst now and seeing he never wore a condom with me and from our previous conversations they knew I always made T.J wear one, they feared the situation at hand.

When he saw the catastrophic state I was in at that point, it was the housemaid who helped me get up and assisted me down to the car where Jo-Jo was waiting for me. He drove us to either Lennox Hill Hospital or Mount Sinai. I can't remember, as it was so blurry in such a bad condition. Rushed in for immediate testing I was uncontrollably vomiting and in so much agony, I was given an injection to help me to subside the intense pain. A nurse came in to ask who would pay for this and although I insisted my parents insurance still covered me, Jeffrey persisted that he take care of all the medical bills and gave the nurse his information.

When the pain relief kicked in, everything and everyone dwindled away until I felt like Alice in Wonderland who just swallowed the shrinking tablet and everyone standing around me seemed to move so quick, speak so loud and hover above me. When I awoke from my induced state, I was alone in a different room. Not knowing at all what went on but feeling a little better, I called in the nurse who looked through my charts and checked my vital signs. Then told me the doctor would be in shortly to inform me of the conclusion to my illness.

He was a tall man with dark hair, and a hardened look about him obviously from his job and constantly seeing the worst horror stories man could think of, he just bluntly told me I had miscarried in early stages of pregnancy. I should be fine to go home as soon as my course of intravenous antibiotics was complete. The news sunk in fast and hit a deep nerve. I waited for the doctor to close the curtain before I let out any emotion and cried for my disastrous lifestyle that was dragging me into a world that I wanted to break out of. This reoccurring cycle of believing I needed men like Jeffrey to succeed in my life was draining the last bits of sensitivity left in my heart. I was picked up by Jeffrey himself who took the doctor alone to the side of the busy hallway to have a private conversation about something. Jeffrey wasn't comforting at all, instead he sent me back home to rest for a couple weeks, and I only fell deeper into a depression, using all forms of self-medication to treat my sorrows.

Two weeks later, as if Jeffrey was trying to lighten my spirits, he told me I would be going to his island to meet a new client. He is a Harvard Professor, named Stephen [REDACTED]. I would be spending two days with him showing him around the island, dining with him, and treating him to a massage whenever he wanted. Without Jeffrey even verbalizing the need to have sex with him, he told me to keep him happy like I had my first client. I packed my suitcase with island apparel, and kissed T.J good-bye, who had at least offered me a warm embrace upon the news of my miscarriage but none other than that knowing it wasn't his.

Stephen was a quirky little man with white hair and a mad scientist look about him. We arrived separately and I greeted him when one of the housekeepers picked him up from the airport and arrived by boat, instead of helicopter as Jeffrey and Ghislane often arrive on. We made our acquaintances and he looked as if he was tripping over himself with words, obviously delighted with his company and location for the weekend. I showed him around as Jeffrey had asked and took him on an adventurous quad bike ride around the small curvy paths, leading the way and letting loose my hair, doing something that gave me a natural high instead of the prescription one. The sights alone were breathtaking from the mountainous peaks of the untouched parts of the island, we sat at a cliff and just sat there, not saying a word to each other besides to

compliment the sights mother nature that appealed to us. I didn't feel as if I owed this stranger anything but what was expected of me by Jeffrey and I could be polite, I just couldn't be myself.

We got back to the main villa to see what time dinner would be served so we could have time to unpack and clean up beforehand. We both met at six pm for dinner on the outside veranda. He sat at the head of the table and I sat next to him, politely folding my napkin to put in my lap. The first time Jeffrey and Ghislane had seen me cut meat and eat with a fork and knife they were so appalled, making fun of my unsophisticated habits. Ghislane took the fork and knife in her hands and proceeded to show me how to politely cut my food and eat. Now that my mannerisms had improved they wouldn't have to be worried about my etiquette when someone important was around anyone. We both drank the red wine supplied on the table and it seemed to warm me up on the breezy night. By the time dinner was served and another red wine bottle later, he seemed to get funnier. I made fun of his tousled hair and he poked at me for my skinny legs, calling me a wanna be-anorexic. When dessert was brought out, he asked if he could receive one of the delightful massages he has been hearing about from Jeffrey. I gulped more red wine down and sweetly complied with his offer, dreading the moment I'd have to see his naked body, let alone touch it. I asked the housekeeper Kathy that had been serving us that night to please have someone set up a massage bed in one of the cabana's. I went to my room to down a few Xanax, telling him I wanted to freshen up after dinner but to meet me in his cabana in twenty minutes or so. I was ready to go as I had said, twenty minutes later, with the effects of the tablets mixed with the red wine, and I would be free not to feel anything. He was still dressed when I got in the cabana, obviously not accustomed to this and a lot slier than what I had been used to, I told him he'd need to undress and lie face down on the table, putting a towel to cover his bare bottom to prevent him feeling embarrassed during the massage. I gave the massage my earnest as I always had, and quickly got through having intercourse with him. Not wanting to make any foreplay or anything extravagant out of it, I let him think that's as good as it got, and by the smile on his face, I thought I had done enough.

The next day I took him down to the beach for a real massage under a tiki-hut on the waters edge. It was one of Jeffrey's favorite places to have a massage, as he droned out to the sound of the waves and my gentle therapeutic strokes. Afterwards we had lunch back at the main villa and went back down to the beach to swim out to the water trampoline about one hundred meters off the dock. He didn't do any bouncing around or anything like that. It was just a good base point for a rest spot after a long

swim. What was really cool about it though, was you could see through the mesh and watch fish swimming underneath.

The rest of the afternoon we spent by the pool reading magazines and eating fruit plates. Eventually he went to his cabana to have a nap later on. That night after dinner and my mixed cocktail of Xanax and red wine, I asked if he'd like another massage before I went to bed. He just wanted to stay up watching movies in Jeffrey's theatre room. As peculiar as that request was to me I didn't argue it, I just hoped I hadn't disappointed him in any way that could make it back to Jeffrey. I showed him how to use the remote and turn off the T.V when he was finished before going to bed. The next morning we were both catching a flight from St. Thomas and we had no time for anything other than breakfast and packing, which saved me from having to be too polite as we said our good-bye's from the terminal in the airport, both hurriedly off in separate directions, thankfully. I arrived back in Palm Beach, only to be told to catch another flight the next day to N.Y.C, where Jeffrey would fix me up the money he owed me for treating his colleague out to an entertaining weekend.

Chapter 10

I was fixed up more than what I had usually made for two days, which was great because that car I had been saving for was finally within my reach. I had been waiting for the freedom a car gives every teenager for a long time, and now that I had over fifteen thousand dollars saved up I could pretty much afford to go buy myself a nice car outright. Looking much better than the last time I saw him Jeffrey acknowledged it. I went to his office where he was waiting for me and he had a guest with him. She was unusual looking to the common stereotype drop dead gorgeous girls Jeffrey had normally introduced me to. Of Asian decent, her name was Rena. Jeffrey had met her at an art gallery where some of her own artwork was on display. She had a bubbly persona about her and I could then understand why Jeffrey liked her so much, she fit into the subservient category that he liked his girls to fall under. It was apparent to me that they had already slept together in the short time span they had met, as there closeness was oddly noticeable and I wondered what it was he was offering to her in exchange for her body. I found out later from Jeffrey that he was buying her artwork, promising her the world as an artist, telling her he'd have her work in the all the museums in N.Y.C and the best art exhibits. Everyone was promised something, and seemed to be bought off in some way or another to be in his company. It was only a matter of time that the truth would come out.

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To my own amazement Rena was to be assisting me in Jeffrey's massage this day, not being a total knockout or anything spectacular, looks wise that is, but for some reason he seemed intrigued enough. As we made our way through his spectacular mansion she was in total awe at every corner. Commenting on the present artwork and décor that we passed in every hall, it no longer seemed so grandeur to me anymore but hearing someone else speak about it in such excitement reminded me of the days when all of this seemed so unforeseen.

When we got to the massage room, or "The Dungeon" as I used to put it for it's medieval looking appearance, we firstly out of custom all had a steam shower, where Jeffrey expected me to walk her through a servants duties, telling her to take his other foot and start rubbing in small circles and stroking the arches of his foot rhythmically. Rena took the instructions well and began to massage him too. When we all went to the shower next and she followed in my exact lead washing his body as well. Jeffrey absolutely loved the fact that two teenage girls were dually pampering him. Jeffrey wanted to move to the massage bed and I had to further begin to show her about the body, upon his accord. She mimicked my every move up his legs and buttocks, keeping up with every stroke until he could not contain his arousal any longer and was already requesting us to start kissing each other, the start of the very reason we had even met in the first place.

He blatantly stopped the massage nowhere near being complete and turned over to announce his increased arousal in a physical abundance of grotesqueness. Moving over to the small couch in the corner of the room he made a space for her to lie me down on the massage table as she had commanded him to do in such a domineering tone that he wasn't used to being spoken down to with. From that very moment onwards and from the look on his face he was yearning for her to orchestrate an hour of deliverance upon my meek nature. He started to stroke his erect manhood as he was being tantalized watching her take over every inch of my body in a dominating act of seduction. I was left breathless and soar after my first introduction into the world of S&M.

Rena considered herself a dominatrix, she loved bondage, whipping hitting, and eventually cutting her sex partner with little sharp knives until they subdued to her punishment in agonizing pain. She was absolutely crazy if you were to ask me, and I couldn't help but wonder what got her into this in the first place. All I knew was that Jeffrey was absurdly taking into the appeal of watching us two interact, often with her acting as my mistress who would fondle me with an insurmountable amount of whips and toys. Then she would love to finish off every session by hitting me across my face with a hard blow from the back of her hand and sneering over my curled up body showing Jeffrey her ability

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to make others surrender to her extreme force. She could be so opposite all of the sudden and be tenderly intimate with Jeffrey stroking his penis lovingly and even speaking in baby talk to him, which he seemed to adore.

He loved us pairing up so much that within months he made Rena an official even renting her an apartment at the same place he had one for me during my extensive trips out to N.Y.C. Sending us out shopping together at all of the underground seedy sex stores downtown we would bring him back thousands of dollars worth of sexy outfits, sex toys and bondage material. His favorite one was a black leather studded collar that lead down the back of my spine to cuff my hands and feet together, offering Rena the most compromising positions to wield her afflictions, one she was excited to pick out for my usage.

She was good at eradicating my softer side though. Helping me forge an unpredictable scenario of me turning the tables on her, making her at my will instead of me always being at her twisted discretion. Jeffrey loved the rivalry between us, both striving to dominate the other one but to me it was just another way of surviving her punishment. All for show I thought she was a madman let loose in a torturous domain of violent sex and unbearable beatings. I wasn't sure how long I could hold off this charade of S & M, I just didn't want Jeffrey to think I couldn't give him everything that she could, always being replaceable in his company.

She and I could often come across as good friends to his blind eye but it was only a matter of time before the animosity inside of me was going to snap. Doing normal things too made it all half bearable. Having a lot of similar interests we did fun things like go to the theatre to watch

"Phantom of the Opera" or visit several historical and art museums together, afterwards treating ourselves for a giant piece of greasy N.Y.C style pizza. Like I said, we really liked each other purely as friends but the dominance in the massage chambers was taking it's toll on our strange friendship. One average trip back to N.Y.C, she surprised Jeffrey with a six foot by six-foot oil painting of her and I lying nude in a ying and yang position facing each other. Although we were soliciting each other with sexual innuendo the picture was still very carefully orchestrated to perfectly portray the darker side of Jeffrey's thrills. It was an amazing piece of work, besides the lewdness of it, but she would've known that's exactly what kind of art Jeffrey liked. He was so astounded by her gift as he had previously asked her to construct a small painting of us together but was not expecting anything of this grand magnitude she had presented him with. He lifted her from the ground and twirled her around before he thanked her profusely and embellished her with his profound gratitude, the only thing Jeffrey had to offer, he handed her a small wad of cash as her payment. It was the most appreciation I had ever

seen him show a girl. Obviously moved by her gesture, he got her an exhibit in N.Y.C's "Metropolitan Museum of Art" where she submitted her very own piece. She sculpted an image of my headshot out of clay, shaping it with the strands of my long hair blowing across my face. I was taken aback myself at her creation. She really did have an amazing talent if not for her meaner streak she would've been a great friend. I will never forget Rena, for all of the ups and the downs we endured together.

It wasn't too much longer before I finally had enough of the abuse in the bedroom and I had to tell Jeffrey what I was feeling. She was getting even more violent as time went on, and with her questioning me and Jeffrey why she didn't get brought on long trips with him, she didn't get the fact that she was just a tool for him to use. Jeffrey said he was already thinking about getting rid of her off of his "regular list". He said she was becoming too clingy and he didn't like clinginess or jealousy. I never even got to say good-bye or take the opportunity to keep her as a friend, like a girlfriend to catch up with once and awhile, but that's how it was with Jeffrey, one day you sat under the blanket of his comfortably and the next without any warning you could be discarded like yesterdays news. She would've taken it hard but that's the game we were playing and it was for those who knew what lines not to cross.

I was further surprised the next day when Jeffrey gave me a thousand dollars to go shopping in downtown Manhattan to find a classy dress, on top of being sent to the exclusive beauty salon of celebrity stylist "Frederic Fekkai" for a new look. It was amazing, to be pampered like royalty. I walked out of there feeling like I had replaced a young girl with a young woman, I felt beautiful. He had yet another surprise in store for me. Ghislane called me and told me I need to go to a photo-developing store and ask them for two I.D photos then bring them downtown to Jeffrey's Manhattan office. Weird request I thought. I was more used to posing in full body shots being sexually exposed as a gift for Jeffrey. I did as they asked and took my two photos into the office where Jeffrey's assistant was waiting for my arrival. Still not telling me what the headshots were for, she took them from me and told me to have a seat for a second. A moment later I heard Jeffrey call me into the office. "I like what you've done with your hair, you've gone more blonde, suits your glowing tan". I replied with an appreciative "thank-you" for sending me to such a renowned hairstylist, and shopping money. I showed him my finds for the day, an elegant off the shoulder navy blue dress that had two layers that would swoosh and sway with my every stride. I couldn't wait to wear it on a special occasion, and I wouldn't have to. The pictures I had to bring to him, as he would proceed to tell me, were for my first passport. I was so excited, we were going to France for a close friend of Jeffrey and Ghislane's birthday party, famed super-model Naomi

Campbell. I was so over-joyed with excitement, what girl my age with a background like mine was attending socialite parties and globetrotting the world. It only made it harder for me to see beyond the elusive walls I had put up to protect myself from the appalling truth.

We left in early April first going to London, Paris and then our final destination being St. Tropez in Southern France. If Hallmark had a postcard, St. Tropez would definitely be on the front of it. It was beautiful spring weather and every where you looked women were dressed in bikini tops branded with some kind of designer label embedded into it and the men were following them around like harping dogs in heat. In all of the elegance of the Mediterranean, "La Bastide De St. Tropez" was an impressive landmark. Jeffrey and Ghislane were staying in one of the private cottages, on the park on the grounds, while Emmy and I stayed in separate quarters inside the hotel. The old style cobblestone streets were lined with boutique shops and beauty parlors. It was the hedonistic stomping grounds of the beyond rich and famous.

The next day we went out to lunch at the grand opening of the infamous Nikki Beach Club, where a cheap glass of champagne costs around two hundred dollars and if your not keeping the alcohol consumption flowing like water, you'd be asked to leave to make way for the constant flow of prospectus patrons. That's where I first got to meet Naomi Campbell. She was wearing the typical attire strutting around southern France, a D&G bikini top and a wrap around mini skirt to go over the swimsuits bikini. She was so tall and stunningly beautiful. Her charisma was energetic, funny, and everyone seemed to hang off of her every word and laugh at her every joke. Ghislane and Jeffrey kissed her cheeks and wished her a happy birthday, and then I was introduced and followed in their suit. She was surrounded by a league of assistants, got enough time in to invite us aboard a yacht of a fellow she was "kind of seeing" at the time for the before party ahead of tonight's event. We went back to the hotel and I gave Jeffrey a massage in his room before we all headed down to the pool to soak in some of the year's first sun's rays.

I loved wearing my new ball gown and feeling like a princess. It was absolutely sensational and made me feel as if I floated in the dress. I swept up my long hair in a twisted clip, only letting down a few curly strands and layered on the mascara. Receiving many compliments throughout the evening when we eventually left the Yacht to make our appearance at the main birthday bash, I couldn't help but feel excitement for the party to come it was the first celebrity birthday bash I had ever been to. Being introduced to model after model and the rich men that followed them around became dizzying. Jeffrey sat back and watched as I buoyantly worked the dance floor, coming back to the table where he

was, only to grab another glass of champagne every now and then. Every so often he'd introduce to me to someone new, pulling me aside to show off his eager young masseuse to his fellow pedo's. These people had so much money pouring out of them. I don't know why he even thought they'd care in the first place. It made me feel good though. At least I knew I made him proud to have me in his company.

Being surrounded by so many of Jeffrey's colleagues and his likeminded people that were considered the most sophisticated and the highly esteemed of today's world nearly made the way I was living lately more fathomable, at least to myself. I thought if everyone looks up to these people and they are all accepting of it, it must be just the way the world turns. I danced with a young prince that night and with all of the help from the bubbly champagne I couldn't remember his name for the life of me. On one of my trips back to the table for another glass, Jeffrey leaned over to quietly whisper in my ear that it was a prince that I had actually been dancing with and I didn't phase me in the least way. I went back to the dance floor and continued to let my hair down. It was a fun bash, the entire crowd sang "Happy Birthday" to Naomi and by the time we got back in the car to retreat for the night, I was giddy from the drinking and dancing all evening. We had a guest in the car, and apparently we had already been introduced, but I couldn't even remember his name in the first five minutes of our meeting again. He was the hotel owner of some large chain in America called "Hilton". Staying at one of the cottages near Jeffrey, he saw it quaint to loan me out for a night's massage to ruin an "almost" perfect evening. Jeffrey told me to come back to his room after I was finished with Rick, thankfully he reminded me of his name but also odd I thought, being so late I would've never imagined Jeffrey could stay up this late but I never made a fuss out of his requests. I gave him affirmation of my understood instructions and headed off with this stranger into the darkness.

I dimmed the bright lights in his bedroom to a softer tone as if it might aid the vision of this short, balding man with straggling remnants of curly brown hair left to show for the remaining bits of youth left in him. I had to ask him to undress and lay on top of the towel that I had picked up from the neatly folded pile at the end of his bed and spread it over the duvet. I didn't want to waste a second in his place, getting right to the very reason I was even there. Turning around while he was getting undressed, being our first time together, I wanted to give him the impression I was actually a therapist and not a finale to the end of the nights entertainment. Not exactly what he had in mind though, given that my impression was already made for me when Jeffrey arranged for our meeting in the first place. His chuckle to my response was condescending as he came up behind me and unzipped my dress which floated to the

bottom of the floor as he was saying "You can't really expect to give a massage wearing this, here sweetie, I'll help you out of it." He just wanted to see the hidden bounty my clothes were hindering his eyes from seeing. I just went about my way trying to get his hands off of me and to get him to lie down for a massage. Making quaint conversation with him was pointless as I was trying to send his thoughts elsewhere other than the apparent perverted schemes replaying in his mind from the heavy breathing he was making and the looks he was giving to me. I was using all of the tricks in the "turn-off" book even asking him about his wife and kids.

Unquestionably he was in seventh heaven turning every one of my distractions into another flattering compliment. He was saying things like "I love what you do you to me, I have never felt like this before, come stay with me and I will pay you double, no, triple whatever Jeffrey pays you!" Knowing he was just a drunk idiot, I wasn't being lured in by any of his offers of money or a privileged lifestyle, I knew these cages all too well and I was better off sticking with the one that I was at least accustomed to already. Holding back any composure now, he was going extremely wild ravishing at my body trying to tear off my panties like a hungry wild animal. After all of the champagne I had drunk that night it gave me the nerve that I needed to know exactly how to handle perverts like this one, who had been no different from every other shmuck in my life, and I quickly shut him up with a blowjob lasting no longer than two terrible minutes. It had only been shy of a half an hour before I was already getting quickly get dressed and hurrying out his cottage door.

When I got to Jeffrey's cottage I rushed through the door and told Jeffrey and Ghislane, who were sitting front of the fireplace reading a book, that I never ever wanted to see that guy ever again. When they asked me what was the matter, I told them of every thing that had happened that night even how he offered me to come work for him getting paid triple. I established a lot of trust with Jeffrey that night. He asked me why I didn't accept the offer and I responded with "Who would look after you, if I were gone?" Like a caring grand father would do, he pulled me into his chest for a hug and told me that it meant a lot to him. It was so late and I was so tired but I still had to give Jeffrey his massage that night. He asked me to just rub his feet as he fell asleep, and thankfully he was out like a light in no time. The next morning I took two headache tablets and a ginger ale instead of a coffee. Trying to contain my hangover as best as possible behind a pair of sunnies it was mid afternoon by the time I had felt like myself again. We spent the day Yacht hopping, soaking in the sunny weather while Jeffrey and Ghislane caught up with old acquaintances, Emmy and I were just accessories to look good on the arms of them. The next day we wrapped up the tail end of

our trip and commenced our flight back into the U.S. I was paid a generous amount and set off to go car shopping as soon as I got back to Florida. Through a private seller, I was able to pay out right for my car. I got a Dodge Dakota in cherry red, and immediately had an impressive sound system put in. She was my first pride and joy and taste of freedom. I would love to drive her down to Lakeworth Beach to sit in my car and watch the waves while I listened to my stereo blare music and puffed on a jay. Letting the rest of the world pass by while I sat back and watched them walk past wondering to myself what their story was about.

I turned seventeen that summer and had accumulated a string of exotic destinations that I had travelled in such a short time. I was given more make-up and a pair of diamond earrings from Jeffrey. Ghislane only wished me a happy day, wondering at times if she felt threatened by Jeffrey's and my closeness. We went to the island after we left N.Y.C and I asked if Sarah would be meeting us, mentioning it had been a while since we had last seen her. He said he had some bad news about her. Expecting the worse, thinking she had gotten hurt or something, I was astounded when Jeffrey told me that she had been sent to his island with one of his friends for a couple days and when the housekeepers were cleaning her room and they found a stash of cocaine left out carelessly in the bathroom.

He said he had no choice but to let her go. Addicts with no respect for themselves or his wishes had no leeway in Jeffrey's book. He didn't mind that I dabbled in drugs once in a while as long as I never brought them along with us on any trips, except for my Xanax, which he didn't mind because it was pharmaceutical and most of all wouldn't cause him trouble being a legal narcotic. Sarah took it too far when she crossed international borders with an illegal drug, risking her welfare and almost costing Jeffrey public attention. She lost her apartment and contacts in the acting world, only hearing from acquaintances once in a while that she was sinking deeper and deeper into the black hole of addiction. It was sad to find out, as I always did like her.

At the island, Ghislane had just recently obtained her helicopter pilot's license and wanted to get some practice airtime and flew Jeffrey and I to St. John where we picked up Alexandria Cousteau, the grand daughter to the inventor of the scuba tank and underwater explorer Jack Cousteau. Ghislane was out to set us affright in the air, but it was all talk, she was actually an impressive pilot. Still a daredevil though, she got her kicks out of hearing us fret on the ear muffs intercom's. Jeffrey made it clear that Alexandria was a guest when I was told to adhere to her if she wanted a massage, which I obliged her with several times during our first meeting. It was Jeffrey who instigated that her and I reenact as lovers in lesbian acts of foreplay and penetration. I couldn't imagine a girl with

such high prospects lowering herself to something of Jeffrey's standards, but I later found out through Jeffrey that he had donated money to her continuous exploration into marine life and habitats. She had followed in her family's footsteps, all of them involved in Marine Biology in some way or another. We actually got along really well, she was a real decent girl, and loved talking about her passion, everything underneath the waters surface.

When I wasn't busy giving massages to everyone around, her and I would hang out together. Often we go swimming in the crystal clear pool of ocean that the Caribbean had to offer. Once we swam out so far not paying attention to our location and were carried out to sea by the current. We took turns on the backs of each other, taking breaks against the strong ocean tide. It was almost a possibility that we nearly drowned out there, if it weren't for some guys on a boat out fishing for the day when they caught us in their view. They picked us up and brought us back to the island where we were reprimanded by a worried Jeffrey and Ghislane to first of all let someone know where we are going at all times, and never to lose sight of the shore while out for a swim. After that learning experience I took their heed and proceeded with caution. I had a newfound respect for the ocean and it's mysteries.

Having such a lover of the water as a guest, made Jeffrey want to explore parts of his Caribbean he had never seen before. The next morning we were met by a scuba instructor in St. James and given a few lessons in how to use the gear and more tips like how to descend slowly to the ocean floor as not to cause blood clots as well as visual hand signals to communicate underwater. It was so exhilarating beneath the waters surface. No voices to listen too, only the enchanting sights to take in. We explored the surrounding reef and found a large squid, many of sea urchins, and the magnificent colored coral that housed a many of the rich variety of the local species of fish. It was such a great sight to take in. Holding a permanent mental picture of those adventures to carry in my head for all times.

We all had such a great time that Jeffrey hired the same scuba instructor to come out the next day to scuba dive the safer parts around his island. We got bored quickly with not much to see but seaweed and a fish here and there. It didn't take long before Ghislane decided for us all to explore other numerous locations by boat. Jeffrey needed a bit of convincing at first and the instructor was quick to assure him that he knew his way well around these waters, of course he would say that, he was getting paid a hell of a lot to do this in the first place, why not extend it a few more hours?

The clear water glistened and the tropical array of marine life was on display as we wanted to stop at so many places but you could see as

beautiful as it was it could be as equally dangerous. It took so long as we had to veer away from so many desirable spots. Finally we found a good place that the scuba instructor thought was safe. He buddied us up into pairs and we jumped off the back of the boat into the crystal aqua blue waters beginning our descent slowly into the darker regions of the oceans floor. We were situated on open water with a cavern of reefs to venture in and around down below. It seemed to be quite a choice to scuba in, one that our guide said he wasn't familiar with but to alleviate his bored clientele deemed safe to swim around.

It was Jeffrey and the Guide together, Ghislane and Emmy, and I was paired up with Alexandria. Miles, the houseman, came with us and stayed on the boat just in case something went wrong and lucky he did. We were all too far under the water to hear his alarming screams of distress when shadow's lurking in the murky distance started appearing closer and closer. Ghislane actually looked frightened for once as she gave us the signal to start ascending upwards, reminding us by holding her ears not to go up to quick or as we were previously warned before we could pop a blood vessel in our brain and hemorrhage to death, not a very lovely image but neither was getting torn apart by sharks. Those giant shadows became clearer and soon enough we could recognize their indistinct species as the terrifying and more aggressive breed of sharks, the hammerhead. Grabbing Miles hand I was the last one ahead of the Guide to get on the boat imaging the worst as I waited behind Emmy and Alexandria who were the next to follow after Jeffrey and Ghislane I was in too much shock to scream or cry, I just told myself I had to stay calm to get out of this alive. Unlucky for us we found out later on that we were in their breeding territory and being sent a clear message that we were soon to be on the menu to their feeding frenzy.

We all felt like we had cheated death and I know it wasn't only my heart that was still beating out of my chest when we headed back to Jeffrey's island. Jeffrey was pale as his designer sheets and looked like he had aged another ten years in such a scared state. Ghislane took the heat off herself even barely taking a notice of beforehand and decided to poke fun at all of us frantically scurrying to get out of the water, it was just her nature, as I had never seen her move so quickly either. We got back to the island and all collapsed our fatigued bodies in our own beds for a long nap. Freshened up and much more relaxed we regaled our horrendous story again over dinner, this time in laughter. The following afternoon Ghislane piloted us all in the helicopter to St. John's Airport and we said good-bye to Alexandra where we all parted ways. I met her a few more separate times in Palm Beach at Jeffrey's Mansion, but she wasn't a regular of his, probably not as easy as the troubled girls were to bribe.

Chapter 11

Throughout the remainder of the quickly passing year I was on a constant move with Jeffrey. Attending various dinner parties, mostly with other esteemed billionaires and widely acclaimed scientists. Jeffrey likes to surround himself with the most brilliant and powerful of minds, filling his little black book with some of the most esteemed and even infamous people in today's wealthy society. It was during those intellectual gatherings that my body was also put on the banquet menu but this time for a powerful senator George Mitchell and another prominent Nobel-Prize winning scientist who's name would be mentioned but for all the life of me can no longer remember. They would be only some of the recognizable figures of the high society that became added to my list of clientele, of course being introduced to for a lot more than just a client of massage.

As an amusement to Jeffrey's associates I also knew my place was to entertain but not to every desired content. I was to show them a good time but not the way I would have to use technique and effort for Jeffrey. The very teachings from Jeffrey himself, or my tutor, as he liked to so eloquently put it. Consistently being used and adored for the likeness of my youthful looks I was becoming very accustomed to my lifestyle with Jeffrey, never really relaxing into it, but just accepting this as being as good as it will ever get for me. I didn't think I should be complaining, wasn't I being offered a life in exchange for servitude? Just letting the signs of my anxiety and depression pass me by while I blanketed them with my pills, suffocating under a blanket of pain is all I was really doing.

I spent Christmas and the New Years holidays with Jeffrey in N.Y.C., who doesn't celebrate the occasion, as he is of Jewish descent. Not that he was a religious man anyways, I never even saw him celebrate Hanukkah either. We firstly stayed at his ranch in Santa Fe for a week, then left for a long plane trip to Paris, France where we all suffered jet lag for the next twenty four hours. We all stayed in a grand hotel with a view the Champs' Elysee.

Emmy and I shared a room and with her gifted ability to make new contacts in just a few hours, she brought out a jay to share on the rooftop at nighttime while we were overlooking the lit up Eiffel Tower. We never got really close as buddies but we both knew what we were indebted to and felt each other's sorrows. All four of us went out shopping at Chanel, D&G, Ralph Lauren, and many other little exclusive boutiques the following afternoon. As a gift Jeffrey bought me a white terry clothed goose feathered sofa and had it sent back to my apartment in Florida, and bought some new tapestries to have sent back to Santa Fe for his ranch.

We also visited his up and coming Paris apartment. It was a modern, typical flat being refurbished, and we went to see how it was all looking. Jeffrey liked to fuss about every detail and harass the builder's about their work, changing last minute details at a whim.

Days and many croissants later we left for Spain feeling bloated and sleepy. We only stayed in Spain for the afternoon, going to see another astounding Moroccan castle for Jeffrey to replicate at one of his many mansions. It was only a short plane ride to Tangier, Africa for more castles hopping. We arrived at the historic landmark and the only five star hotel in Tangier called El Minzah in the village of Ville Nouvelle. The city and outskirts were still very hostile at the time, females being warned to not walk the streets alone and not to leave the house after dark or be at risk of being raped or worse.

When we got to the room, it was oozing with every expected bit of extravagance that a luxurious historical palace should offer until I was greeted with a pile of monkey poo in the very middle of my bed. Not a happy camper I called Jeffrey, Ghislane and Emmy into my adjoining room and they all had quite a good laugh at my expense. Within a moments notice of a complaint call to the front desk and we had an attendant cleaning up my bed linen. The cleaner noticed the window was still opened, he warned not to leave it ajar at nighttime just in case another monkey wanted to make himself comfortable in my quarters.

Ghislane joked that maybe I should keep it open I might find a suitable husband before I get any older. Always the instigator of a good joke but unable to take one herself she didn't like when I poked back that it was more in her recent taste of men, since she loved to brag about her rendezvous with her various lovers. Once she came back giddy as a schoolgirl with an explosion of news, with all the build up and excitement in her voice you'd think she was the next crown princess, but she had given George Clooney a blowjob in the bathroom at some random event, she never let that one down.

We all went to explore the towns surrounding Moroccan castles and meet their royalty that lived in them. Jeffrey's personal interior designer's met us at the residences. They walked around hurriedly, scribbling notes into their clipboards and whispering between themselves. The palaces were historically unique and beautiful but I wondered how could they live so grandeur behind these walls when they lived in a city of such poverty stricken squabble. Beggars lined the streets, people could just go missing and no one could care less, and you heard of barbaric murders happening every night. Against the advice of the Palace Attendant and Jeffrey's wishes, I decided to take a stroll one afternoon, mainly just to take photos of exotic Africa and do some shopping in the village markets but I ended up being intrigued by a group of young children playing in the streets.

When I was noticed watching them, about fifteen of them came up to me and began to beg for money and food. I was over taken by the poor, hungry children and I felt sad for them all and wished I could help out somehow. When the tide of kids washed away and the street went empty, I was overcome with intrigue at these two little boys. Brothers I found out later on, and there only toy was an empty can they were kicking to each other in the middle of the street. Intelligent kids, they were able to speak three different languages, including English and I was interested to ask them about life here. They didn't seem to notice or be bothered by their poverty stricken lives. They told me about their school and parents and I thought I had just heard the saddest story ever but they were accustomed to living like that like I had been so accustomed to my degrading lifestyle for so long.

I was compelled to empty out the contents of my purse, giving them over two thousand dollars in U.S. currency. A passer-byer snapped a photo of the kids and me for myself to take home as a personal souvenir before they rushed home to proudly show there parents the money. I told Jeffrey later on of my good deed and he couldn't believe I'd give away my money so carelessly. He told me I had set up their parents with enough money to feed and shelter their family for a year. Wasn't that a good thing? I couldn't believe it, not that I was well off or anything close too it, but to realize how lucky I was and to not have compassion for the lesser off, especially children of a third- world country, I wouldn't be human anymore. Then again what did I expect from someone who could numerously steal another man's daughter for the use of his own sexual pleasure with great ease.

We went out to lunch the following day with Jeffrey's team of designers to wrap things up and after Jeffrey's afternoon massage he went to the palace to have a nap. When I was all alone I thought I'd go see the culture of the local unique markets again and this time buy some trinkets to bring home. I got to sightseeing and took pictures of the legs of lamb hung over the blood drenched doorway over people's homes as to warn off evil spirits and the ghettos where the local villager's called home. I walked into many of the market's stalls and saw the most peculiar antiques, such as weaponry with the blood of it's last victim stained on it's sharp blades and body pieces of various animal's for the use of religious sacrifices. I was more interested in the different culture and respecting their ancient way of life with interest, instead of squirming like a tourist and getting grossed out. I thought it was so educational and enthralling in fact, I ended up buying a few sacrificial trinkets to have sent to my apartment in Palm Beach. Not to say that I wasn't looking forward to getting back to the luxuries of western civilization it was a bit like camping, fun and adventurous but as equally dangerous and thrilling.

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When we left for the final destination of our trip I was looking forward to eating normal food again, not one to stray for foreign dishes, I'm a more of a cheeseburger and pizza kind of girl, a true sign of my American heritage.

We landed at the Heathrow Int'l Airport and greeted by a driver that would take us to Ghislane's town house in London's central that Jeffrey had recently bought and refurbished as a gift for her. Emmy said "Good-bye" at the airport, leaving us to go to her hometown in the rural countryside nearby to visit family for a six-week holiday from work. It wasn't a very long drive before we were in the heart of the city and at Ghislane's place. I thought it was a cheery townhouse that had character and the historical pub in front of it and cobblestone streets only added a unique charm to its presence. They were going out for dinner and invited me along with them but seeing I was so exhausted from all the travelling and looking a bit melancholy, I apologetically declined going out for dinner that evening, I rather would be taking a few pills to catch up on some needed sleep. "Are you sure your Okay?" Ghislane asked as she showed me to my room, more considerate than she normally was but I assured her that I was in absolute good health, just tired from all of the recent jet lag. Without another word said she whisked off downstairs, to the car where Jeffrey was waiting for her.

I took the liberty to call my parents house to say "Hello" and catch up with them since I hadn't been home at all for the holiday season this year, always too busy working. They sounded really happy to hear from me and my mom put me on the phone to talk to my brothers as well. I got to tell them about my travels abroad and I had some cool tribal stuff from Africa that I bought for them. They sounded so proud of me, all of them, and why shouldn't they be? In everyone's convinced mind I was making great money, travelling the world, and meeting new faces everywhere I went, why should I spoil anyone's delusions, especially mine. I took my sleeping tablets and had a bath before falling into a deep and much needed sleep.

The next morning I was woken up by Ghislane who I could tell was in a chirpy mood by the way she paraded through my closed door saying "Wake-up sleepy head" and opened the window's shutters to let in the bright sunlight, she had never done anything like this before and I knew immediately something big was happening. She sat down on my bed as I rolled over from my deep slumber and I was able to mutter for an explanation as to why she was awake so early. "Besides the fact it is ten o'clock in the morning and nearly time for brunch, we have a big day planned out for you today." She was waiting for my cue to ask her "What are we doing", when I did, she responded with a convincing enthusiasm "We're going shopping for a new ensemble" she paused for a moment to

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build the suspense, before completing her sentence "To go dancing with a Prince of England this evening." Hoping it would be one of the younger generations, I was disappointed when she told me he was the Duke of York, Charles's younger brother Andrew. I looked at her with a fake surprised look, one I had to use on many occasions in my time with them, to give an impression of excitement. "What...wow!" I exclaimed with my gifted acting ability. It is a sad realization but I had grown more accustomed to seeing people for their significance rather than the good qualities they possessed, and was able to grin & bear the thought of what I expected lay in store for me.

Ghislane and I left shortly thereafter for the many lanes of designer shops to choose from in London. Her pep talks to prepare me for my duties towards royalty went on and on, giving me the obscure impression I was something of importance, at least for more than an evening. "Make sure your bubbly and energetic, nobody wants a dead horse" was one of the cheap tools she instilled me with. "Who knows where this could lead for you" was another. As the day grew shorter my anxiety only heightened, anticipating the Prince's arrival and unable to decide on an outfit, I picked out three. Our last stop for the day was Burberry's for a nice handbag to compliment our chosen attire. We got back to her townhouse with still a couple hours spare to get ready. After trying on all three outfits and many mental debates with myself later, I decided on the pink mini-tee and dazzling pair of denims with horses embroidered into a pattern. It seemed a lot more my style and age group rather than the other two older looking sophisticated dresses I had picked out. I told myself I was going dancing at a club not to an opera. As most young girls can be during their body changes into womanhood, I felt awkward, you know, big feet, freckles and body hair in unwanted places. They're things you just don't want when you're seventeen and then you see these iconic billboards of what femininity is supposed to represent and just don't fit into that picture, never feeling what we all are already... absolutely perfect. By the time I had got ready I was a nervous wreck, but trying to keep my cool on the outside was an act. I thought it'd be a good idea to take a few Xanax before the evening unraveled and my anxiety went through the roof.

Jeffrey and I were sitting in the lounge room downstairs, waiting for Ghislane to finish getting ready. The room was silent, only stillness in the air. I stared at the mural painted onto the wall that I was facing. It was an interesting piece of artwork. In great detail it illustrated a happy looking family sitting on a bench overlooking a pond that resided on a large piece of land with a beautiful home displayed. There were also hunting hounds and the hunters chasing a game of fox like the notorious "English Hunt Pieces" throughout history. Jeffrey took notice of my enchantment into

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the picture and in a hushed voice proceeded to tell me that it was a portrait of Ghislane's childhood, the part she could be proud of. I never realized how prominent her family's history was in England, apparently as to Jeffrey's attest, her Father was born of poor Jewish decent in Czechoslovakia, most of his family being killed upon Nazi invasion in 1939. Fleeing to join the British Army as a young man, he changed his name a few times and made a lot of contacts in the field. After the war, a newfound Robert Maxwell went into publishing using his army contacts to establish a business initially built upon publishing scientific books from occupied Germany. In time, Maxwell acquired several British newspapers, among them the Daily Mirror, countering his wits against the likes of Rupert Murdoch along the way. However, whilst constructing his publishing empire, Maxwell compiled astronomical debts, and his equivocal financial dealings attracted the attention of governing authorities that judged him not to be looking out for his companies best interest and in the end it transpired that Robert Maxwell had been using proceeds from his employees pension funds to meet his financial debts, ruining the futures of thousands of employees. Once an esteemed Member of Parliament and publishing mogul, Robert's body was found floating in the Atlantic Ocean after he was found to be missing from his yacht, the Lady Ghislane (named after his favorite child), whilst cruising the Canary Islands in 1991. Jeffrey went on to tell me that when her Father died she was inconsolable, and in a very bad state. He picked her up from the trenches of despair and took her under his wing, and it's there she has stayed comfortable ever since. To Ghislane his peculiar need to have so many women around and even his taste in younger than legal one's didn't seem unconventional to her. It was her own Father who was deemed a womanizer and even took a second wife whilst still married to Ghislane's mother. I would have never guessed this carefree, spirited, and vivacious woman had ever endured such sorrows. I couldn't help but look at her in a different light from then on, but not letting her know that I knew, to avoid any altercations between us.

Like clockwork Ghislane came downstairs five minutes before Prince Andrew were to arrive, wearing a tight-fitted white woolly turtleneck singlet and a nice pair of loose fitting trousers. Looking elegant and casual at the same time, a very hard look to achieve but one Ghislane had always easily mastered. They both seemed at ease poking fun at my obvious nervous state, just another ordinary night out for this extraordinary couple. The knock came at the door just after six o'clock in the evening. Ghislane greeted him and the guard who would wait for his return in the car. She led him down the hall to where Jeffrey and I were sitting. We both stood up and Jeffrey shook his hand, while Ghislane proceeded to introduce me and as I was taught by her was English

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custom, we both kissed on the cheek. We all sat down on the lounges for some tea and biscuits while conversing in idle chitchat. By the sounds of it, Ghislane knew well of his recently divorced x-wife Fergie, whom they were all taking turns in slandering her for one reason or another. It was apparent there were some fresh wounds still lingering on and as good friends do, it was their way of helping him get over her. When his daughters were mentioned, Ghislane and Jeffrey treaded lightly, only speaking highly of them, and offering their sympathy to the young ones.

The conversation turned to a much lighter subject. Andrew wanted to know more about this young guest they had to join them out for dinner and dancing that evening and then the spotlight turned on me. I was more nervous than I had ever been before a night out with someone, probably the build-up Ghislane and Jeffrey had hyped this meeting up to be. To break the ice, she played her favorite guessing game... "how old do you think Jenna is"? When Andrew guessed correctly, I was seventeen years old, she was surprised, thinking I could have passed for younger. "I guess we are going to have to trade you in soon" she laughed, always the first one to throw in her quick-witted two bits, all of them chuckling along with her. Hardly a laugh at all, unknown to me at the time his eldest daughter is only five years my junior. I was finding it hard to make much conversation in the beginning, just laughing when the occasion called for it, and keeping up with Andrew's constant glances in my direction, was all I could manage.

The restaurant was a close drive for us with Andrew, his two guards and his driver following behind us. I was seated next to the Prince for dinner and Ghislane and Jeffrey next to each other, an evening pre-ordained. I was supposed to flatter him with compliments and dote on his every word spoken, but I didn't even do that for Jeffrey blatantly, it would've felt awkward to act like a bimbo for him. Instead I remained calm, cool, and collected, hoping that my nervousness wouldn't spill out at any given moment. The next place we were going was much more my style, and I found it easier to relax. We pulled up next to a Nightclub called "Tramp", a member's only nightclub, and one of the most exclusive haunts in the world for the rich and famous to be seen for the last forty or so years since it's doors first opened. Andrew's guards waited outside while we all went in to hit the dance floor. Jeffrey being the social introvert that he was found the first available empty seat in the corner but facing the dance floor to spend the evening watching everyone else have fun and Andrew went to the bar to grab us all drinks. He came back with sparkling water for Jeffrey and a cocktail for the rest of us, already knowing that Jeffrey never drank alcohol. We downed our glasses and made our way to the crowded dance floor, where I had the Prince's upmost attention. Moving his hands across the curves of my body, not to shy away from the fact

that he was in public, he was whispering sweet nothings into my ear and kissing my neck. I would just giggle not really knowing how to reply to an aging man with a bad smile and terrible moves, it would sound too much of a lie if I retaliated back about his swagger. He was the most incredibly hideous dancer I had ever seen and couldn't help but laughing on the dance floor and shooting glances of embarrassment to Jeffrey and Ghislane who were having a good time laughing at my expense... as the always did.

After an hour of pelvic smashing to the D.J.'s pumping mixes we finally exited the floor, his royal highness was dripping with sweat and ready to embark onto a quieter scene where he said we could be alone, not knowing that it had already been arranged for all of us to meet back at Ghislane's place but complied with his so called thoughtful request. I was so anxious about getting back to the townhouse, knowing what expectations I would have to not only have meet but also exceed in this case. Ghislane and Jeffrey seemed impressed at my attempts to entertain his royal highness, so far giving him exactly what he wanted the impression that I idolized him. They told me that he really liked me and was having a great time, so far tonight. When we got to the townhouse, his guards walked him to the door, staying to wait outside in the car. Ghislane met him and brought him upstairs where Jeffrey and I were in the study. We all chatted in the hall for a few minutes and I was able to have Jeffrey snap a photo of us together, one that would cause much controversy for the Buckingham Palace in many years to come. The conversation didn't linger on much longer before Jeffrey and Ghislane dispersed downstairs together, leaving me to my own sort of royal duties. They walked away giddy as if they were teenagers imposing on young lovers about to embark on a romantic evening.

Next to the study was the bathroom where I led him to next. The room was dimly lit masking the light from showing the disparity in my eyes. It was a beige marble tiled floor with porcelain Victorian style bathtub in the middle of the room and nowhere near the size of Jeffrey's residences. I turned on the taps for the tub and the heat from the water began to steam up the small room. On the basin were aromatic oils, lotions and soaps, loving the scent of floral notes, I poured in the lavender bath oil. Trying to do the best of my youthfulness to try and act seductive, I gradually began to strip off my clothing, piece by piece. Giving him time to savor the moment to come. He loved every second of it as I went over to where he was waiting and watching, then began to undress him at a much quicker pace. We kissed and touched each other before submersing into the hot water, where we both continued to reenact foreplay. He was adorning my young body, particularly my feet, caressing my toes and licking my arches. That was definitely a first for me and I couldn't help

but laugh, I hoped he didn't expect the same treatment back. Through my recent experiences with Rena, I drew a line with extreme fetishes, especially ones that would involve my tongue and feet in the same sentence. It wasn't hard to get him wound up to the point where he just wanted to have the rest of me so we dried off from the cold and retired to my bedchambers for the longest ten minutes of my life. Moments later and without any real emotional attachment, he burst in ecstasy, leaving me to my own feelings of dismay. As relieved as I was to see the experience come to pass with him, it was finally sinking in that I would never be anything more than but a muse. Still trying to ascertain a surreal dream a young girl once held but no longer the same girl I was no longer sure that the dream was even real anymore. In the whirlwind thrown together by wealth, power, and privilege I was but a grain of sand and felt helpless down the road I was naively being led down. When the real picture was unveiled, later in my life, I had nothing but memories filled with sorrow to remember of my teenage years.

Jeffrey, Ghislane, and I left for the states to conclude our long journey home to the U.S.A. I was so happy when we landed on our soil and called T.J from my cell phone to see if he'd meet me at the airport instead of going back to Jeffrey's, he'd be there within twenty minutes, he was so happy to hear my voice and that I was back in town. So ecstatic to be getting away from my life of servitude for the next few days, I was sourly disappointed when I got off the phone. As if he'd been listening to my entire conversation, Jeffrey told me he'd like a massage back at his place and he could pay me at the same time for my trip with him. With much dismay I had to call T.J back and cancel the arrangements, I wouldn't see him until later that night, in which one of Jeffrey's staff would drive me home and I would be too exhausted to do anything.

Chapter 12

When we got back to Jeffrey's mansion in Palm Beach he wanted to thank me for showing his friend, the Prince, such a good time. Rewarding my diligence with an extra sum of money and luring me deeper into his goal of keeping me at his side as his personal amusement that he could lend out at anytime. Further proving his capability of using the vulnerable impressions of a young girl to influence and intimidate his fellow peers of

like minds. Jeffrey didn't want to know the grim details of how it all happened on my intimate night with the Prince, he just asked simply if I thought that I did well in keeping his friend happy. Knowing already that the evaluation of my performance I gave was already discussed between them, I just as simply replied back with a nod of approval. Though I did have a laugh with Jeffrey about the Prince's weird fixation on my feet and let's just say that he was quite tickled with Andrew's quirky obsession, having a good ol' chuckle at my eccentric encounter. I was paid extremely well this time, putting my money earned into nothing but popping pills and alcohol by shouting my so called friends a good time, aiming for the attempt to forget about my experiences abroad. I parted like that to feel young again, my age and most of all to self-anesthetize my troubles from within. It wasn't like I was waiting for someone to arrive on his white horse and take me away to a magical world. I simply yearned for more out of life than being someone's replaceable amusement. Still a romantic at heart I would often get lost in my daydreams, imagining a new beginning with a strong man that would show me an enduring love, safety in his arms, and a lifetime friendship. Though the suggestion of true loves existence was only a dream for now, something I could only read about in novelistic fairytales but the passing thought from time to time was warmly envisioned. With my inner most desires being locked away in a deep crevice of my heart, I knew my romantic notions would be absurd in Jeffrey's eyes. For some unknown reason to me he couldn't allow himself to give love or receive someone's heart in return. Once he said to me when I asked him if he ever thought he would settle down and find Mrs. Right and he told me he didn't believe that love with one monogamous partner was possible but he found that love with many was. I thought at the time it had something to do with having so much money and everyone wanting him for that instead of seeing him as a person and even felt bad for him, but now I can understand from his recent lessons unlearned that it was a simple equation of his twisted perversion to become infatuated with the vulnerable youth off the streets. Spending so much time in the entrapment of Jeffrey's embrace, I was becoming numb to the feelings and aspiration to ever climb above this deep hole I had dug myself into. I knew I wanted to escape from this bizarre form of first class slavery but I still didn't have the tools necessary to help me get out. How could I have? Everyone that knew me believed I was living this enchanting life, a rags to riches success story that most people dream of, only I knew the price to be paid for all of this and I was the only one who could pay for it. Underestimating my true self, I was settled by Jeffrey's side for now considering him to be someone to look up to, my mentor. Such a

complicated battle within myself, it is one I still ache to fully comprehend today.

Sunny spring days melted away the ice off the frozen streets of New York and the harsh winter winds began to gently blow away the dead leaves, making the caged trees appear to have some form of life again. I hated the cold winters there, it would only add to my depression being locked indoors. Give me hot Florida days blistering in the sun where I can swelter by a cool pool and sip cocktails with pieces of fruit and little oriental umbrella's floating around. What a vision of solace? Looking around my extravagantly decorated mid-evil room I was reminded of the desolation that I was more than accustomed too. Knowing it wouldn't be long before I was summoned again for another ritualistic occurrence in communicating with my master, I hardly bothered to leave my assigned chambers, scarcely being sent home for a moments break, I just accepted my fate. As I predicted the intercom buzzed momentarily and I heard Ghislane's voice come over and request to meet them in Jeffrey's study. Not an odd call, I would often meet him there first so he could tie up some unfinished business before heading to the dungeon, or what was thought to be the massage room. Making my way down the hall, I had an eerie feeling wash over me, as if I had several pairs of eyes on me, watching my every move. A cold chill moved up my spine and I had to move my thoughts elsewhere, too easy behind these walls to succumb to my fearsome anxieties. I punched in number one once inside the elevator and it took me down to the floor where Jeffrey and his surprise guest were waiting with anticipation behind closed doors. I cracked open the heavy wooden doors and a familiar face revealed itself. Definitely not expected or pre-warned on my part but I already knew what he was here for or at least why I was called down to the study. Prince Andrew had that notorious cheesy grin slapped over his face, as he looked me up and down like a shiny new car on display and he was about to take it for a test drive. Ghislane led me to the decadent sofa he was lounging on and twirled me around to give him a good lookover before sitting me down on his lap. Like a show pony I knew exactly how they wanted me to be paraded around, with the last of my dignity long lost, I had nothing more to lose. It was easy to give them the reaction they desired, all I had too do was pretend to be entertained by their lewd gestures, and when Andrew cupped my breast with a doll made in his image, I only giggled away. Ghislane wanted to take a picture of the bizarre scene and even got Johanna, another one of Jeffrey's so-called personal assistants, to come sit on his other knee for the snapshot, giving the impression girls couldn't stay away from Randy Andy.

Many crude jokes later and I was asked to show Andrew to the upstairs massage room. I'm sure he already knew where it was from previous

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encounters with Jeffrey's "staff" but I led the way anyways, as if he was now my guest of honor. Entering into the dim room it took a few minutes for my eyes to adjust to the darkness, but knowing my way around the room was enough to find the shower. I turned on the steam room and began to undress myself. Andrew followed my lead and disrobed, throwing his attire to the floor. I wanted to run and hide feeling his hands touch me again, but my servitude for Jeffrey kept me there. Getting out of his stronghold I turned my attention to the steam filling up and tried to turn his attention to the marble bench where I suggested he take a seat while I rubbed his feet. By the look in his eyes I knew he could care less about a foot massage, his real desires were being shown by the arousal his body was forming. He indicated where he wanted me to touch him and how. I fulfilled his seedy requests, but only just. There was no pleasure in this for me, the only thing I derived from this event was to sink further into my slumber of depression. I couldn't remember a time when I felt needed for anything other than my body or amusements thereof. After his massage was thoroughly conducted I couldn't wait to get back to my room for another shower. Sitting on the floor of the shower under the harsh spray of water, I scrubbed my body where he touched me. Feeling abhorrent and ashamed what I had become, I let the water wash away the grime.

As the days progressed into nights and the nights followed a trail of destructive months, my outlook on life had diminished into utter sadness. I had lost my spark and my ability to look like I could handle the abusive state of affairs I had drifted into. Sinking deeper in the euphoric state of being on coke and pills, not only was my mentality dwindling away but also my looks. I sure as hell didn't feel like a seventeen year old anymore and now I wasn't looking like one. My eyes had dark circles underneath them from not sleeping and my bones protruded from my skinny waistline and chest. This made Jeffrey apprehensive in keeping me around as often and before I had a moments notice, I was out of money and looking for a job. When I questioned him what was happening, he told me I wasn't the same girl he had first met some time ago now and looked like I needed a break from working so much. "I'll call you next time I'm in town" was the last thing he said to me.

Chapter 13

Going back to an average teenagers life was more of a harder transition than I would've ever thought. Jeffrey stopped paying my expensive rent and I was forced to get off the drugs and look for a real job to feed and shelter T.J and I. It was much harder than it sounded, but I was craving

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this in every possible way. Even though a week's wages for working a full-time job as a waitress didn't come close to the money I had made in a couple hours of working for Jeffrey, I was happier than I had been in a long time. I made some friends at my new job and found my duties to be easy and pleasant. I was good at making customers smile and keeping them happy becoming the waitress that made the most tips for the night, which in turn made my co-workers happy since we'd all split the tips at the end of the week. For the first time in a long time I had boys my age hitting onto me, and not that I was ever taken aback by there attempts but it reminded me of how it felt to be around a younger crowd. I missed so much of what I couldn't get back and the more I tasted it, the more I remembered how to smile. The relationship between T.J and I began to falter in a way that was beyond reconciliation. Fights became physical and I saw sides to him that only pushed me away more. He refused to look for work to help pay bills and he became utterly frustrated not having his usual cocktail of assorted drugs to keep him from feeling anything at all. He didn't like the fact I was growing inside and thinking beyond his elusive world. I had gone through too much to accept another form of abuse and degradation. Making that point very clear to him by kicking him out of my apartment back to live with his parents, I felt liberated like never before. I kept up with my rent and cleaned my act up. Enrolling in a yoga course and keeping my focus on staying fit and healthy became my only source of enjoyment. I was free and living for myself.

While out doing the grocery shopping one evening I couldn't help but stop at the local pet store and fell in love with a furry pooch. She was a Japanese Chow-Chow and a bundle of fur that more resembled a baby brown bear than a dog. I took her home with me and instantly she became my best friend. We went for several walks a day and she bore the brunt of many tear filled conversations, she was my loyal companion who understood more than anyone had before, all I really need was someone to listen and funny enough it was her that filled that hole.

Nearly three months had gone by and not a word from Jeffrey or Ghislane. With T.J out of the picture now too all I had to concentrate on was work, my parents and brothers, and of course my dog, Mary-Jane. I was going to family night dinners and bon fires again. My older brother was getting married to an amazing woman in a few weeks and I got to be apart of their beautiful ceremony. Small details of life's journey that I already missed so much of and now being able to smile at the simple things day in day out really seemed to put the real value of life into perspective for me. Everything seemed to be working out for itself and I was really happy, until he came back. T.J thought he'd come over my place one evening while I was sitting at home just watching TV.

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Obviously mentally distorted from whatever choice of drugs he was smoking that night. He screamed down my apartment complex, going mad and scaring my neighbors I felt like I had no choice but to let him inside. I tried talking to him as a good friend would, just wanting him to see what he was doing to himself and what he had become. Part of me still loved him and took pity on watching him spiral downwards. Taking him back into my life was not a decision I made whole-heartedly, but was something I did out of guilt and what I thought was loyalty. He moved his clothes back to my place, which was all he ever owned anyways and we tried to pick up the broken pieces. T.J being still badly addicted to many drugs, I had to be very careful where I kept my jewelry and expensive items. I decided to rent out a space at a local spot and store my cherished items away, just taking the necessary precautions, I thought.

Still not working I knew how he was scraping by money and I didn't agree with it, T.J was a known thief and had been caught several times attempting to steal things, even as stupid as DVD's and PS2 or Xbox games from a local Blockbuster. He even stole from his parents, his sister and his brother and would probably steal a piece of candy from a five year old kid if he knew that it would get him his next fix. He hated the change in myself, realizing I couldn't be brought back down by his ways but knowing I still stuck by his side and defended him from anything that would hurt him wanting to believe that he still wanted show the bits of human nature left in his empty heart.

Unable to stand by and see me do well for myself he contemplated a way to try and bring me down. After a busy shift one night, he retaliated with another show of control. I had just finished cleaning up my area and setting out the tables to be ready for the next day when I went to the bar to hang up my apron and put my nights tips in the tip bowl on the counter by the beer tap. On one of his drug induced rampages he stormed into the restaurant where I was working and started to pick a fight with me. I

knew he was off his face when he started accusing me of sleeping with my manager on shift that evening. Having no bias or ground to stand on in his attempt to make me look bad in front of everyone, I just laughed him off as a drunk idiot who needed to go home and sleep off the night's repercussions, although I was fuming inside that he embarrassed me but I still made excuses for him and told my boss I had to leave early to bring him home.

The bar was deserted as T.J waited alone for me slumped in a barstool and looking worse for wear. I had to go to the back of the restaurant and do some explaining to the manager on duty. I couldn't afford to lose my job over this incident. Surprisingly he was sympathetic towards my dilemma and even told me I could do a lot better than that schmuck, patting my back and telling me to have a couple days off. I punched out

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and headed to my car with T.J. in tow. For the rest of the night he was oddly quiet and asked to be dropped off at his parent's house. I was more than obliged to do so. I couldn't stand the sight of him let alone want to be around him tonight. Being so revved up it didn't yet dawn on me that something wasn't right. The next morning I was woken up by an alerting phone call. I had the manager from the restaurant where I worked, on the other end screaming at me and asking where the money is. I sat up in bed, completely awake now, and asked him back, "What are you talking about, what money?" His tone had calmed a bit and he could hear the earnestly in my voice and explained his accusations "The tip jar was empty after you had left last night and there was over a hundred and fifty dollars in there, now it's missing". The answer hit me instantly and I got a terrible knot in my stomach...T.J. When I left him at the bar not even thinking about the tip bowl to talk with the manager, he saw an opportunity to fund more drugs and he took it. That's why he didn't even want to come back to my apartment last night. It was all too clear for me now and I tried to explain to my manager about my boyfriend's sickness and asked him to take the lost money out of my wages. "I have no choice but to let you go and file a police report for the missing money". I couldn't believe what I was hearing. How did things turn upside down so quickly? I exclaimed "Even though I'm paying you from my pocket for money I didn't even steal and you've never even had any problems from me before?" His apologies were short and icy, nothing that could be done. I slammed down the receiver only to pick it up again to dial T.J.'s parents house and to no surprise he hadn't slept there last night and was not able to be reached. I felt like I was in a bad dream I couldn't wake up from and with no money to pay rent, eat, or even survive, I was back to the drawing board.

The week passed without hearing from T.J., he was in hiding, for now. When the phone rang early one morning I expected it to be him, instead it was a surprise phone call from a familiar voice. Jeffrey decided to give me a call to invite me over to his Palm Beach mansion for some lunch and to catch up, it really was just his way of finding out if I was cleaned up and ready to come back to work for him. With my life in chaos once again and having to borrow money off my parents for grocery food, I saw a quick solution to my situation and was even convinced this is what I had to do to take care of myself.

He greeted me at the door and led me inside. Ghislane was at her usual spot, her desk working away, and we headed past her with a quick wave and lip-synced a "Hello", not wanting to disturb her important sounding phone call. She glanced up quickly and gave a brisk wave my way, then put her attention back to the computer. Once we were inside the poolside cabana, which was Jeffrey's office, & gym, Jeffrey took a seat behind his

desk and told me to have a seat across from him. He took a sip of water from an already poured glass and asked if I'd like some. "Yes, Thank you" My reply was short and polite, already just wanting to get this meeting done and over with. His face was like steel and his expressions were stern, I felt like a child in trouble sitting in the principles office.

He cut straight to the chase wanting to know "Are you on drugs anymore?" There was a moment's pause as I took a deep breath and told him the entire truth. "I got really depressed for awhile and coped with my emotions by blanketing them with mind-altering substances. Just smoking a jay to relax wasn't good enough anymore. I needed to be high and flying to believe I was happy and dealing with all of life's curveballs. Snorting things like coke and popping amphetamines replaced my sorrows with an overflow of endorphins, making it possible to keep up with everything, until I would come down and the cycle just kept on repeating itself".

He listened to me continue to tell him about the good things that have come from the break. Like my dog, yoga, and working at a restaurant, making lots of new friends but most of all, I got my smile back, without the drugs this time. He was really happy to hear the upside of everything, but there was one thing I was reluctant to tell him about. My recent travails that T.J. effortlessly caused at the restaurant where I was so happily employed. As my manager had warned he had to file a police report stating that after I had left, the tips were gone, putting the blame solely on me.

Giving Jeffrey a clear picture of the entire ordeal he exclaimed "What are you doing with this idiot Jenna, he is no good for you! I know you can do better for yourself, why do you let him drag you down every time?" Nodding my head in concurrence I went on to finish my epic drama. "I received a phone call from the PBCP asking me to come in about the money, I told them what happened over the phone but they still want me to come in. I don't want to have a record for something I never did or ever would do!" I put my face into my hands and covered the tears now trickling down my cheeks. "I just can't believe this is happening to me when everything has been going so uphill, now I'm out of work and in trouble" I wiped my face and looked up at him "What do I do?" Enabling him as my mentor once again, his sly grin said it all. Jeffrey normally hated when girls made waves in any way and this one would be considered a tsunami but this time it worked to his favor. He wanted me to come back to work for him, continuing my massage studies and I needed his help. In his eyes he was doing me a solid, which in return I would have to scratch more than his back for. Taking his time to contemplate what to respond back and what solution he could offer, I began to worry that maybe I shouldn't have done this.

Pulling a few tissues out of the box, he passed them across the desk to me. Trying to retract any damage done I said to him "I must look like such a mess to you and making you listen to my saga. I am so sorry... I shouldn't have come to you with all of this." He looked surprised and sympathetic "Quite the opposite actually. I'm glad you've come to me for help. I have got a lot of connections especially with the Palm Beach County Police Department. I give them regular hundred thousand dollar donations, and after I speak with them there will be nothing more to worry about. To be honest I'm more in shock about how much can happen to you in such a short time, your life is one big soap opera."

Now he was chuckling and trying to make light of my somber mood. Laughing along too I replied "I know right? Drama just hangs around me like a bad smell". We did some more light-hearted catching up and went out to the poolside for some lunch and a swim, concluding the evening with an erotic massage upstairs. He paid me the usual two hundred dollars and asked me to come back tomorrow. "In the meantime I don't want you thinking about your sticky situation, consider it dealt with". His attempt to brighten my spirits had worked relieved about money and the police but now I owed myself to him feeling indebted to him more now than ever.

Chapter 14

As was promised I never heard back from the Police Department and Jeffrey had his favorite girl back by his side. We picked up where we left off ever better than before, I being entirely subservient to every sexual desire of his engaging myself in any role he wanted me to play. As he was getting older his appetite for sex never hazed, if anything it only increased. The orgies with other girls got larger in numbers and his appeal to younger girls, new toys and wilder nights expanded from once and awhile to quite an often occurrence in Jeffrey's company. I put it down his new friend and business investment, Jean-Luc Brunel.

A long time agent for young and upcoming models, Brunel, a French citizen, was known for roaming the world in search of young, naive beauties living in poverty stricken countries and willing to do just about anything for money. He would procure them mostly from Clubs in South America and the Former Soviet Republic. Filling their heads with fairytales of America and large amounts of money, he would promise them all of the finer things in life, sometimes even throwing a pill in their drink, if that meant getting them in his bed was becoming too much of a task. What he wanted is what he got, which is why him and Jeffrey

ultimately became close pals and he invested one million dollars into Brunel's company. In return Jeffrey now had supply of girls on tap for him to choose from.

With the assistance of each other, Brunel obtaining the illegitimate visas for underage-overseas girls and Jeffrey housing them at his brother's apartment complex on 301 E 66th St, Manhattan, they were quite the team. Jeffrey and Brunel would charge them for rent, forcing them to work for them selling their bodies for money, nude pictures, and even pornography. These were what seemed like really nice people with not so nice intentions setting an impression of how the dignified wealth play and behind closed doors they had as much civilized manners as a barbaric chimpanzee in heat. Giving a girl a step-up in finances by teaching them there only worth is what lay between their legs, us girls all were the same in the end, regardless of what country we came from, what language we spoke or our cultural indifference, we all were being used for one thing alone, our youthful looks and beautiful bodies.

Being Jeffrey's permanent sidekick, I would have to part-take in a many of the hedonistic exploitations that went on at one of his many residences, which meant having to be uninhibited with many girls my age and younger. Being complete strangers was hard enough but we couldn't even understand each other, speaking in different tongues we were expected to excel at preforming many acts of lovenaking and foreplay on each other, while being observed by a man in a corner jerking off. Not exactly what I would call an advantage in my stage of life, but in my head I was convinced we all had to do what we had to do to get on with life and if that meant doing all of this to keep Jeffrey happy, then I would do that.

It didn't take long in the accompaniment of Brunel for Jeffrey to hit an all time low, at least one that I knew about. Stupid enough or sick enough, I don't know which one it is or both but Jeffrey bragged about his birthday present from Brunel, once accepting three, twelve year old girls, sisters at that. He replayed the descriptive events with me telling me how they all massaged him and finished him off orally. He was so excited about the entire event, replaying over and over again over the next course of weeks how cute they were and how you could tell they were really young by the small amount of hair growth in their pubic region and non-existent breasts. A twelve year old, are you serious? I thought to myself. I still can't shake the feeling of disgust when I recall the look on his face as he told me time and time again of how his lust brought him to that profound low. He went on to tell me how Brunel bought them in Paris, France, from their parents. Offering them the usual sums of money, visas, and modeling career prospects was a bribe of the worst kind, they were just children. Laughing the whole way through, Jeffrey thought it was

absolutely brilliant how easily money seduced all walks of life...nothing or no one that couldn't be bought in his eyes. Behind the two of them followed a destructive trail of those in their path that were misused, violated, degraded in a variety of ways for one purpose... to satisfy the desires of the perversion that rotted their hearts.

The next couple of months I spent in Jeffrey's company, my life was revolved around him and his petty happiness. Arising to the occasion, I was no longer his teenage sidekick, I was growing into being a young woman and my body was blossoming like never before. Out of the awkward stages of my life, I now took to looking after myself like never before. Regular sessions in tanning beds and keeping fit became my life outside of Jeffrey. He kept telling me what a beautiful woman I was developing into and would offer suggestions to help me look good. Sending me to dentists for regular teeth whitening consultations or helping me choose my attire for the evening, he was ushering me into a whole new position, training me up for something else, but I was unsure of what that was.

Being a snotty little teenager was a girl of the past. Now I had to be his eloquent speaking, desirable to all and almost his personal porcelain doll. I went everywhere with him again, all of his eclectic dinner parties, conferences, and meetings with various members of parliament, famous celebrities, and other esteemed billionaires...most of whom lived by the same rule of thumb as Jeffrey did. Quite an alarming realization having to accept this world the way it is. Jeffrey knew all of the right people in this game, and trading girls for favors is how he kept in the circle. He was at the center of it all, blackmail being the only thing next to money with the ability to pull a many of strings, his conniving ulterior motive was to drag all that he could down to his pitiful state of mind. Inviting easily tempted acquaintances to his island or his other various residences he would bring out the assortment of young girls and pass them around like they were cocktails on a platter. No girl had a choice in whom they went with, only completing a task, we would have to charm and bedazzle these ageing fat men who other than paying for it would've never had a shot at getting to know a beautiful girl intimately. I personally belonging to Jeffrey rarely had to be loaned out and it was a big occasion, or should I say favor, if I was. I'll never really know what made me so important or special to Jeffrey, it definitely had nothing to do with love. I guess in the end I will always put it down to my capability of being whomever he wanted when he wanted, so compliant it just made it easy for him to have a personal toy at his constant disposal. All I can say is I lived in a jail with no bars, and in a country where slavery was supposedly abolished a long time ago but still existed right underneath everybody's noses. Myself and so many other girls were walking proof of it.

I still was given proper training in massage therapy from time to time, keeping me from looking back at being a teenager with no responsibilities to being a young adult with prospering titles. He knew I wanted to be self-sufficient so bad I would do anything for it and by giving me this dream to hold to only kept me in check. I looked forward to my training sessions, holding onto every word passed down to me and after the session was complete I would hurry back to my room and transfer the information into a workbook with associating exercises.

Trying my new moves on Jeffrey always impressed him, he would get excited hearing about my passion for knowledge and would tell me he could see it transfer into my massages, always giving it my all, my hands were a focused energy when I was at work. Using every ounce of strength to apply on a body, many were astounded in what I could do for being such a small girl, and Jeffrey loved it, using me for a two-hour massage "with benefits" sometimes being over twice a day. Ghislane would sometimes use me to massage her still but it wasn't as common, she preferred a man for that job.

Then would come the odd client here and there, of course set up by Jeffrey. Most of which were orchestrated to get beautiful girls comfortable and consequently naked then he would go in for the kill, so to speak, touching them intimately, in their most private of places like their vagina, breasts or anal. When he had us where he wanted, willing and able, then would come the toys, outfits and so on. A scheme he has used time and time again, telling those who know him well "he had never been turned down yet". It was starting to dawn on me how I wasn't getting any clientele that weren't used for Jeffrey's benefit and would make me wonder if I just wasn't good enough for that, but I kept quiet, never wanting to make waves like I had before.

To give me a break from it all as if Jeffrey didn't want to overload me again, he would send me away to his ranch for a few days, what he knew I considered being a small slice of heaven on earth. I'd spend my days roaming the hills, riding horses, and enjoying the solitude of my own company. One afternoon I was out exploring the land on Jeffrey's ranch which covered hundred's of acres with nothing but a bottle of water, my sketchbook and a small case of oil paint. I was on the search for something interesting to paint. A great pastime of mine, it made my soul quiet by creating beauty with my brush. I loved to recreate the images I saw on paper. I would paint anything beautiful that caught me eyes interest, from underwater scenes, animals to people and even fruit, I loved vibrant colors and emotion on display but my favorite soon became the landscape of the Santa Fe's rolling hills and earthy green and beige tones and in certain light it would illuminate into a golden shine. To grasp that feeling I was absolved in at the hardest of times became my greatest inner-

achievement, like taking a piece of that serenity and putting on paper for me to keep in my heart where it still is today, closing my eyes I am able to see it, being there anytime I need to. I was enjoying the heat and taking in the desert's sights when I stumbled off the track and into the wilderness. Exploring everything new to me was my second nature and never even entered my mind what would've happened if I went too far or got lost. I would rather face Mother Nature's wrath than humankind's any day!

After about an hour of drifting off track I came to a pile of rubble, looking like the remnants of an old pueblo made out of clay and rock. I picked up what looked like half of a clay bowl and noted that it had Indian designs etched into the side of it. Excited about my findings I decided to do some more exploring around the fields surrounding the historic site. I collected rare pieces of arrowheads, utensils, and parts of many broken bowls with artwork telling tales of their own. Time was of no essence here and before I even realized the sun had sunk deeper into the hills leaving me without any light to find my way back to the pathway. Feeling silly now after passing by a familiar looking boulder twice over, I was startled when I heard some poor animal become dinner for another, it's screams of agony only amplified louder and echoed in my ear drums, heightening the hairs on the back of my neck and making my heart beat nearly out of my chest.

I was lost and confused before but now I was petrified with fear. Taking me over three hours to find my way back to the path and in the direction of Jeffrey's mansion was a mission, so relieved in the end and so were the housemaids after I hadn't showed up for dinner, assuming I must've been out for one of my usual adventures. I went to bed strenuously exhausted that night and as I was falling asleep the phone rang, it was a call from Jeffrey who had been alerted of my disappearance. "What happened tonight, one of the maids called me to tell me you hadn't come back from your walk this evening." Detecting a tone of anger in his voice I tried to distract him by telling him of my findings and he scolded me for being gone for so long without anyone knowing where I was. Going back to the Indian remnants, I persisted on telling him what I had found. In the end he was just worried about me becoming a liability, but had to make it sound as if he cared. "Don't worry Jeffrey, I won't be doing that again. I can honestly say I have learned my lesson and the next time I want to explore I promise to take someone with me". I satisfied his worry of me being a future nuisance and with that I was finally able to tell him what I had discovered on my walk. He was impressed but did not sound surprised. "You must've been gone a long time if you found the old Indian pueblo's, just be careful you don't say anything about where you found the stuff on my property, it

could become a sight for historical preservation and that means the government could ultimately own my land."

I acknowledged his request and told them they were just a gift for my Mom, who was in love with Indians "Wait until she see's I brought her back real artifacts, she is going to totally freak out." He didn't mind that I was taking them. In fact he admired my curiosity and adventurous spirit. He reminded me that tomorrow was my last day. I would be driven to the Albuquerque International Airport the day after next, to meet Jeffrey in New York, for how long, only he knew. Giving Jeffrey many thanks for a great week, letting him know how much I appreciated these small breaks away, we then said goodnight. Hanging up the phone I had caught my second wind and set out to the kitchen to find a late-night snack. Raiding the fridge and pantry, I found some frozen pizzas and popcorn. I put on a movie and munched on the popcorn while the pizza cooked. Some 1980's dreadful alien flick got the better of me that night. It was based on a true story about people abductions from extraterrestrial beings, which were, like I was, visiting a remote area. I suddenly hated being alone on a ranch in the middle of nowhere. I munched down my burnt, crunchy pizza and became further enveloped in the thick plot. Leaving on the TV and the lights on that night, I spent my night tossing and turning, peeking through the small open crevices of the comforter, half expecting to see an alien being in my bedroom.

Living through the night was a relief and I laughed at myself in the morning, how spooked did I get? When I got to New York, Jeffrey, and Ghislane had a good laugh over my tale of survival in the wilderness and then the alien scare. "Your always having the best adventures" Ghislane exclaimed. We were similar in that way, both being a bit of free spirits it was really only her non-existence of moral standards that differentiated the two of us, in that way. "How do you know you weren't abducted and probed? I mean look at you and all that time alone on the ranch, what do you think Jeffrey, could she pass off as an alien?" Expectedly, Ghislane poked fun at me, her usual fun past time. Our relationship was an odd one, never threatened by each other but always precautions towards one another nonetheless able to crack a joke together, but when it came time to "work" it was no fun and games, she was intensely serious. "With a sense of humor like yours I would tend to think that you are the one from another planet." Just friendly banter between the two of us, then Jeffrey had to jump in with his two bits, "I think you might be onto something Ghislane." I squinted my eyes and gave them both an exaggerated death stare and pretended to grab my stomach in pain, "I think some things trying to get out of me", putting my fist in my shirt to reenact a scene from Alien, I fell onto the couch and faked my death. "I knew it" Ghislane shouted and jumped on me to begin tickling me all over and we

all broke out into laughter. It was those fun times that made me feel like we were all apart of this really perplexed family. We did everything together similar to normal families like eat dinner, watch TV, and travel it was only the hedonistic and corrupt side to these two deviates that made them a peculiar pair.

Getting turned on at the two of us playing together, Jeffrey came over to the couch we were on and pulled down his sweatpants revealing his erect manhood. All of the laughter stopped, now it was time for work. Pushing my head into his pubic region I had to give into his perverted wants. Ghislane started to undress me. Once I was bare she loved starting with my breasts. She cupped them in her hands and brushed her fingers over my hardened nipples heading downwards pressing her lips deeply into my skin, I had to maneuver my body on the couch in a complex position to give them both what they wanted. And just like that, without even a moment's notice I could be put on the spot and have to amuse them in any way they wanted. A shameful way to make someone feel like a used toy, I wasn't around for companionship I was there for one thing, I was a compliant piece of eye candy.

Twenty minutes later and Jeffrey had erupted in pleasure. Ghislane sat up, still fully dressed, and wiped the sides of her mouth with her hands, giving a vindictive little chuckle, "That was fun." Jeffrey concurred with a sly grin arching his back for a stretch just looking able to utter the request "Why don't you come up with me upstairs for a steam bath and massage, I need to be loosened up after that?" It was more of a statement than a request, as if I had the choice to say "No thanks, I'm actually tired myself and would love to just relax" instead I would reply with my accustomed trained obedience, "No problem, when your ready lead the way." I had to get dressed again being that we were in Ghislane's downstairs office. Putting my clothes back on, Ghislane thought she had buttered him up just where she wanted him to ask for him to come have a look at her new townhouse renovations when he was finished with his massage. A very strange relationship those two have, there's a definite love flowing between them but not a passionate one, more like a respectful business, he gets what he wants...an uncountable number of girls and she gets what she wants, simple and sweet...an uncountable amount of money. The two things in life that can create such beautiful moments or the most horrendously terrible of them all, is sex and money.

Chapter 15

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I joined him for a shower, steam bath and concluded his needs with a massage while listening to classical music. I knew he didn't want anything sexual from me now seeing he got what he already wanted downstairs, no this one was purely therapeutic. My favorite massages to give, making me feel like an actual real therapist. I lathered him in aromatic oils and let my hands discover the ways to unlock the stresses that his body held. After the massage was concluded we were going downstairs to get ready to go see Ghislane's townhouse as he had promised her earlier. He loved taking the hidden staircase while I hated it. I was so creeped out by his choice of décor, the blood red carpets, violent medieval paintings, and sculptures of the pagan god Pan, all of it representing the darker side of hedonism his lifestyle provoked. Spiraling down the hallway along with each step you took came with a pair of colors that followed your every step. Brown, blue, green, hazel, all of the colors were there, staring at you the entire way down. As each step progressed, so would my anxiety to get out of there.

We found Ghislane where we had left her, in her office. She had just received an order in, a satellite camera with a twelve-inch flat screen. She told us how it was used to pick up any person in any location with the quick insert of an address. Quite a powerful new toy I thought, but it was only a minute display of what the rich could afford, what use they would get out of it was another concern. Soon after she was done figuring out the controls on the camera, we made a rare and first for me pit stop, the security room. What I thought was our way out by the front door was another hidden door. I was in shock as I was led into a room, so discreet that in three years I never even knew it existed. I kept my head down most of the time, knowing how secretive this must be being another door was an entire security base within his mansion. What I could see when I stole a glimpse here and there was an array of tiny screens, twenty odd or something. Small screens showing various rooms of the mansion I had recognized. The images were constantly changing so I found it hard to pinpoint an exact location but from the décor and short glimpses I suddenly knew from then on that my feelings of my every move being watched inside his corridors was now more than a possibility but was actually happening. Jeffrey spoke to an obese Spanish guy at the desk, whose job was to disgustingly overlook all of the video feedback. Kill two birds with one stone Jeffrey thought, free porn to share with all of his pedophile friends and when the occasion called for it, a security system all at one expense. Ever consumed with making money as well as saving it, I was again astonished at Jeffrey's capabilities. I didn't want to even think how deep the video infiltrated, pretending like I never saw anything at all I put the memory to the back of my mind and went on about my day. Stopping at Ghislane's new townhouse, another gift bought and paid

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for by Jeffrey, he pointed out needed changes all over the place, driving the builders mad, as always. He wanted the place to scream out "GHISLANE" with a bold statement. Checkered floors and bold colors was the theme, like the queen of hearts from Alice in Wonderland, very well suited I thought.

The dust from the walls being torn down choked my throat and the elevator was not in use, the stairs were hardly either. The whole house was in bad shape then having to go up three flights of rickety steps was a bit of a risk too but worth it once you made it to her future walk in wardrobe or to us commoners, a closet the size of a small a house. Complete with a dressing room, luxurious bathroom and plenty of storage for her every ensemble. Even without it being finished it was already a work of art, a sanctuary for any woman. She adorned herself in her future home, finally her own, relishing every inch of it, she already put in a work desk and spoke constantly of its ongoing renovations. About an hour later we were off to pick out curtains and look at some paint samples at a couple different boutique looking shops. Easily passing off as an ordinary couple for the day, they walked arm in arm strolling the streets of the Upper East Side. Except to me, still replaying the early afternoon's events, shaking my head over the echoed images in my mind, I followed behind just waiting to be needed again.

Over the course of the next few months was a constant influx of exorbitant excursions at Jeffrey's mansions, mainly to his island, to keep up with his ever-demanding sexual appetite with various young women and teenage girls. I got back on the Xanax, an old habit that I felt at the time would stop my memories from flowing back, rehabilitate my problems and relax me enough to deal with any situation at hand, no matter what the circumstance revealed itself to be. It was a drug that would blind my eyes to everything I should've been running from.

Having Brunel always in the picture these days wasn't helping me at all either. Sending his girls for Jeffrey at all of his places now and at a vigorous flow, they had an abundance of girls at their disposal. If I were to count one girl for every day of the week, it would be the underestimated statement of the century. So many girls between the two of them, some nights it would be a free for all frenzy for Jeffrey and Brunel, seven or so girls giving them their upmost attention, doting on their every moan and whimper, Jeffrey being the main concern since Brunel worked for him and we were all aware of that too. If there were heaven on earth for men like Jeffrey, then he would be their God. Every one of his inner most desires was fulfilled when his harem of women was around. No wonder he didn't travel much abroad these days, all he ever wanted was right at his doorstep. I couldn't believe that he was still asking me to bring girls to him as well. There was never enough girls to

fill his appetite, so on occasion I would meet a pretty girl around my age and invite her back to his place to make some quick money by offering her a really good contact in the modeling and acting business. Keeping him satisfied and in need of me was a tiring job. With so much competition I had to be on the ball, seeming ambitious to grant him all of his desires. It was a lot of pressure and a spotlight of a role to undertake at such a young age but I told myself this is what my life's training had led me up to be.

My Birthday was around the corner and turning eighteen had lost all of its sparkle and pizzazz. There were no more surprises in store for me, nothing that would bedazzle me I hadn't done already. I spent my birthday on the island, having a quiet dinner and watching "Sex and the City" on the couch with Jeffrey, Ghislane and Emmy. There was no cake or a celebration of any sort but I did get a couple of presents that I opened outside underneath the main cabana. Jeffrey gave me a beautiful pair of sapphire and diamond encrusted earrings and Ghislane bought me another designer makeup case. I thanked the two of them with a tight squeeze and a gratuitous short spiel. As it went quiet, I looked out to the ocean and wondered if across these waters was there ever going to be happier days spent with someone special to me. Would he be kind, compassionate, and always be there when I needed him most? Or would I end up settling for my final bit of training, a marriage to a greedy old scrooge? Either way what I wanted most didn't matter right now. I was still bound by Jeffrey's hold over me and all I had to keep telling myself to get through this epic journey was, this is just the way it was for now.

Around the table for breakfast Jeffrey announced that he was expecting a few guests coming over with Brunel, no one of importance, just his usual entourage of beautiful girls. Russian models this time and Jeffrey was also having a photographer flown in to take modeling photos using the island as the perfect background for a sexy shoot. All of us girls were ushered onto rocks, hammocks, dug into sand and displayed just about anywhere they wanted. We were being photographed in next to nothing, like a netted fabric placed over us if the shot called for it, but the more provocative the more Jeffrey and Brunel loved it.

After the photo shoot we did some outdoor watersports. While us girls raced the jet skis around and jumped on the water trampoline, the men stayed on dry land to watch us from the beach. I was so used to this constant charade of girls and I didn't mind having a bit of fun but this was different, I had to be more than just polite because I already knew it wouldn't be long before we were all intimate with each other as well. Being the only girl that spoke English out of all of them was also a huge blunder. The only way we could communicate was through hand gestures

and body language, a very primitive form of speaking, but what choice did we have?

I did my best to get acquainted and as I had previously assumed after lunch on the beach we were again ushered into another part of the island, Jeffrey's cabana. There was no need for words here, as the girls already knew exactly what to do. Without saying anything they undressed me and began to ravage my body with their hands, tongues, lips and fingers. I was delirious, never having done anything like this before with so many girls. It was sheer chaos; I don't honestly know how men could fantasize over this. Through the glimpses in between bodies crossing over me I could see Jeffrey and Brunel watching us, sitting in a chair with their hands around their penises, stroking themselves together "The best part is they don't even speak English so there's never a need to have to keep them amused" I could hear one of the men divulge and pretty sure it came from Jeffrey laughing out loud to Brunel. I just closed my eyes and went somewhere else in my mind until it was all over. That was that, life went on and we all moved on to eat dinner together.

It couldn't be more awkward as Jeffrey and Brunel were beside themselves with their ego's beaming, and the girls chatted like busy little chipmunks with each other. Ghislane and Emmy on the other end of the table were being amused at the entire racket around the table and then there was me. Sitting quietly and smiling in people's direction when needed, I was counting down the minutes until I could go lay down in my giant comfortable bed, slipping away to the gentle noises the island created and sink comfortably into a deep sleep with the assistance of my Xanax. Scratching at the plate in front of me with my fork out of boredom, I wasn't even hungry. I had lost my appetite for food. Rather sipping on the champagne I wanted to feel as far away from here as possible. What seemed like hours for everyone to finish their meals we were finally all saying goodnight and goodbye to each other, as Brunel was off early in the morning and taking the eight beauties with him. "Thank God" I told myself, once was more than I could handle of that in one day.

It didn't take me long to get back into my own comfort zone. Heading straight back to my cabana after dessert was served nearly tripping over my own two feet as I tried to scuttle off in a hurry. As soon as I entered my domain, I drew a breath and sighed a deep exhale outwards, finally alone and at peace... for now at least. Although the sun had set hours ago the high temperatures of the Caribbean were still an affliction, plaguing my cabana I was welcomed by a rush of warm air as I opened the door. I hit the switch to the fan and stripped down for a shower. Preparing my towel and toiletries I opened the back door to the outside shower and placed them on the floor. Whether I was cleaning up in the midst of a hot

day or retiring for the evening, an outside shower was always splendid. Under a thick dark cloak of the night sky only the moon and stars to shed enough light for me to see my way around. I could feel the soft breeze lick the droplets falling off of my bodies' curves in the reflection of the moonlight. It only encouraged me to stay longer under the warmth from the spray of rushing water. I let the hot water run out before I was sufficed enough to go back inside. Lounging around the bed in my panties and a tank top I was still sweltering from the heat. Trying to tire myself out, I did some reading and eventually fell asleep. I needed those times to unwind after such an ordeal, letting the Xanax wash away all of the pain I could then forgive the mistakes I had made, blaming myself for staying around for this I had wished I was never born at all. The pills would take all of that away for me. My heart was a tangled weave of deception and pain, only reassured by the lies that were told to me and the lies I would have to convince myself of.

Chapter 16

When we flew back into Palm Beach, Juan drove me back to my apartment. Lonely for some companionship I decided to call an old friend. I was longing to be important to someone and unfortunately with such little time to have a social life of my own I was compelled to call T.J. again. His Mom answered the phone and sounded quite surprised to hear my voice on the other end. She was always kind to me, I even used to bring her back "Cola" cans from other countries a bizarre hobby she loved collecting. She just didn't know what I saw in her son, even saying that to his face many times over. Not blind to his ways of cheating and stealing, being a personal victim of it, she made it apparent that she did not approve of T.J.'s choice in lifestyle. It used to really hurt him how his parents thought so badly of him, so he gave up trying to earn their love a long time ago. As long as he didn't steal from them anymore he was allowed to live there. Instead of that being a lesson to him, he would just try to be more clever in what he would steal, less obvious things. He would steal the toaster and sell it for five dollars if he knew it would help to get him his next high.

Nonetheless and at my expense I had a sweet spot for him. With enough water under the bridge, I was able to forget about the troubles he caused. His Mom told me she'd pass on the message when he got home, but that could be days from now. The last time he had been home was over a couple of weeks now. He only stopped by to get something to eat, have a long sleep and to beg her for a few bucks, supposedly to help him buy food. Then he was off again without a single word said, only leaving

his parents to their own assumptions, which were pretty much correct anyways.

I then called around a couple of mutual friends to see if anyone had heard from him. Everyone I spoke to pointed their fingers in the same direction and the worst place possible, Ritchie's house. One of his best friends told me of how bad he was doing. "He's not the same guy anymore, and all he cares about is the next high he gets. If we don't get anything for him he just loses it and goes off somewhere." It was hard to hear how badly affected my best friend was and a part of me secretly hoped they weren't right. Still defending him, I told everyone I had spoke too while trying to find him that T.J. would be fine, he's just probably going through a bad phase, like we all do sometimes and needs people to have his back more than ever now. I was pretty much laughed at on the spot, most people that I considered my friends at the time were only friends by association. As long as we all looked the part, acted the part, and could handle the part, only then did they want to be around us. The last person I called was the last person I had hoped he wasn't with and it turned out that everyone was right.

He was with one of the biggest Coke dealers in our area, Ritchie-Rich, as everyone used to call him. He didn't look like a typical strung out junkie or dealer. Instead he looked like your average preppy college grad with aspiring propositions. He dressed well and acted like a nice guy to imminent clients only to get them hooked on his drugs and then turns them out onto the streets. He was a businessman and his business was thriving. He carried everything from most drugs to guns and knives. Having ears in all places made him a dangerous acquaintance. Using kids off the local Palm Beach streets to run his dirty errands and the errands of the others above him, he made his money by using these teenagers, who as hard as it was to believe was once somebody's sweet child.

I knew T.J. didn't have the finances to support himself or his drug habit so the likelihood of him being indebted to Ritchie in other ways was a safe assumption. Obtaining Ritchie's number from one of T.J.'s friends Marcus he asked me, "What do you want to call Ritchie for? Come over to my place and I can get you whatever you want" Marcus was a sleaze bag who would tirelessly continue to try to appeal to my lesser sense of judgment, never getting the hint or just not caring that I could never and would never be interested in him. "No Thanks Marcus, can I just get the number please, it's very important that I get ahold of T.J. I'm really worried about him." I hated having to call this guy let alone have to ask him for something. "Is this about the Adam bullshit? Cause if it is you can let him know what a fucking bitch he is for not showing up to be there for him, you can tell him from me that it's his fault and it should've been him that's lying in the morgue now, not Adam" I was totally thrown

by his allegations I could only mutter out a whisper "Did you just say that Adam is dead, what happened?" "Oh snaps, I thought you knew, where have you been girl, under a rock or something?" Marcus was less than sensitive about his statements. "He got shot in the head by two black guys who got suspicious when their usual supplier didn't show up, your boy T.J. was so fucked up he didn't even remember to turn up at Ritchie's for the delivery, so Ritchie sent Adam alone and now he's dead." Adam was a sweet kid who just happened to be born living on the wrong block. Best friends with T.J. since childhood, the two were inseparable until puberty hit and even then they would chase girls together. Adam followed in T.J.'s every footsteps, mimicking his shadow, if T.J. jumped off the Eiffel Tower then so would Adam so when T.J. got hooked on drugs consequently Adam did too, leading ultimately to his death. Wanting to end the conversation with Marcus quickly I scribbled down the phone number on a blank piece of paper in front of me and hung up the phone to call Ritchie's place immediately.

"Yeah?" It was Ritchie whom bluntly answered the phone after the first ring. "Hi -Uh- Rich, It's Jenna, T.J.'s ex, we met a couple of times at a few parties" I was trying to remind him of who I was knowing how paranoid he was about people having his number. "Oh yeah, I know who you are, what is it you want?" He answered with a dry tone. "I was hoping you could tell me where I could find T.J. I've heard some stuff and am really worried about him, is he alright?" Ritchie snickered at my concerns. "What are you his Mom or something? He's fine, he should be back here around five o'clock, I'll tell him you called." In the middle of me saying "Thanks and good-bye" he hung up the phone, as there is no room for manners in his line of work. I waited until five o'clock watching the minutes on the clock tick past and when five o'clock came and passed by with still no phone call, I couldn't deny to myself that I wasn't stricken with distress. Falling asleep wasn't easy either. I ended up crashing out on my sofa watching T.V. half expecting to hear of another murder on the news and it being T.J.

Forgetting to put on my eye mask before I went to bed, I was woken up the next morning by rays of the sun beaming into my living room. When I sleep I am a creature of darkness, avoiding any window light at all costs. Staggering to the coffee pot not used to getting up this early, my first thought that day was T.J. and why he hadn't called. A million thoughts rushed through my head like a steam train...is he ok? Is he not calling because he is still mad from our last breakup? Has he moved on to someone else? Is he in any trouble? Did Ritchie even pass on my message? The thoughts were an endless infliction, consuming my entire day.

Until finally he called my cell phone later in the afternoon, relief swept over me when I heard his voice on the other end. "Thank God you called, I have been so worried about you, are you alright?" I jumped in without letting him get past saying "Hello". "Yeah, I'm fine. Ritchie told me you called his house looking for me yesterday and gave me shit for it saying you were upset or something, what's up?" I knew I would have to be delicate about asking what happened to Adam, thinking he'd be a mess over it. "I heard from Marcus that something happened to Adam and I got worried about you, what is going on?" T.J. sounded scared, for what reasons were beyond my knowledge but I was going to find out, he replied "I don't want to talk about it over the phone. Are you in town so we can meet up or something?" It was obvious I wanted him to know that I was more than willing to lend my shoulder for his problems. "I'm home now if you want to come over whenever you feel like it." He didn't hesitate in taking me up on the offer. "But I won't be able to get there until later, I'm downtown at Ritchie's place unless you want to come pick me up."

It was more of a request than a favor to myself which is what he was making it out to sound like. Knowing him all too well I didn't make a fuss of his ill-considered attributes. I got the address off him and made my way into the ugliness of the not so dazzling parts of the Palm Beaches downtown area. Rolling up my windows and locking the doors to my truck I nervously drove through the rough streets trying to find Ritchie's apartment complex. Knowing all too well the history of the area, it's not a place a lone white girl in a nice truck wants to be seen, many reports of the locals rushing up to a vehicles with a weapon demanding money, cars, or just angry and out to hurt someone. I was speeding through the streets wanting to get out of there as quick as I could. A sad world we live in with so much hurt everywhere you look and nobody wanting to do anything about it, just accepting the hopelessness of never being able to achieve anything more than what our civilization has succumbed to. Being among one of those people, we were similar in so many ways. Only separated by our own personal fears and the different direction they pulled us into.

I drove straight through the open gates at the entrance to the complex and parked on the gutter in front of Ritchie's block of units. A crowd of people stood outside the blocks I was entering. Being hit on and offered drugs simultaneously my cheeks went flush and I put my head down not saying a word. Walking up the corridors of the staircase looked like a scene out of a horror flick. Graffiti covered the peeling of green paint on the walls and the pungent stench of something rotting, only to the worst of my imagination, filled my nostrils. I could hear babies screaming

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through the thin walls and trying to find the unit number was difficult from the sporadic flickering of the fluorescent lights above me.

At last I found Ritchie's one, quite astonished with myself that I even made it this far. I had to knock loudly on the door a few times before a young girl answered the door with eyeliner bleeding down from her eyes, her jet black hair was strung out and a mess and she looked off her face on some hard drug. She had only her bra and a short skirt on to cover her private areas and a cigarette hung out of her mouth to complete the full picture of terrible state she was in. She looked me down with contempt and snubbed at me "What do you want?" I maintained my politeness and told her T.J. was expecting me. She opened the door and walked away, leaving me by myself to venture through looking for T.J.

Passing through the kitchen it looked like a hospital lab with syringes on the counter tops and medicine containers lying around everywhere.

Minding my steps through the dirty house, I walked to the back to the living room and found T.J. in a K-Hole strung out on a filthy couch.

"Hey...there" he acknowledged me with a giant smile spread across his face. He probably didn't even know who I was from the dreadful state he was in. My first look at him in months and I was in utter shock. My jaw must have dropped to the floor at the very sight of him. Never seeing him so skinny and unhealthy looking I took pity and wanted to help him before things got even worse and he ended up like Adam, dead.

"T.J. hey buddy its Jenna, remember I was coming to pick you up today. You don't look so good, what are you doing so messed up?" I don't think he could even understand what I was even saying because he could only reply by giggling and rolling over, patting the couch as if it were a fluffy animal. I stood over him now and raised my voice so he'd know I was serious and snap out of it a bit. "Get Up T.J. Now!" I ushered at him to get off the couch, repeating myself a few times over and with no response I knew I had to get physical. Rolling him back over to face me again I smacked his face hard and I'm sure it stung but I got the reaction I had wanted. He sat up and looked at me confused.

At least now he was able to focus on my words requesting him to come with me. He was getting up from the couch and stumbling around before falling down to the floor again. Putting his arm around my neck and carrying the majority of his weight, I helped him up many times over and down three flights of stairs into my truck and drove him back to my place. It was a triumph on it's own arriving downstairs in one piece. Being the only person who really cared if T.J. lived or died I felt like the responsibility of helping him was my concern alone.

Thankfully Jeffrey was in Palm Beach for the next couple weeks entertaining royalty, which gave me a little time to try and clean T.J. up. I called a few of his friends that I knew and asked them not to score any

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drugs for him any more, pleading with them and telling all of them he was on the brink of death, reminding them of the friendship between us all that once existed before the drugs corrupted so many of us. Some of them laughed at me telling me I was wasting my time with T.J. and others were nice enough to at least lie to my face politely and promise not to help him feed his addiction.

I just wanted to remedy all of his pain and problems but I felt so helpless fighting his battle against the streets. I bought some marijuana for him to smoke hoping to subside the withdrawals he was facing over the next few days but with no avail. The only thing that would help him was my Xanax, a few of those pills and he would go back to sleep, only waking up to get more of them. I would have to force him out of bed to have a shower once a day and make sure he ate something. He was more like a baby right now than he was a boyfriend, too much in need of something I couldn't give.

Chapter 17

When I went to see Jeffrey over the next course of days he picked out the dilemma I wore spread across my face straight away. "Your back with T.J. aren't you?" It was so funny that he knew me so well. "Yeah, he's in a real bad place in his life right now and needs my help." He looked astonished and replied, "You're a much better friend than I am. I know people like him and trust me they never change, no use in even trying" I believed him too knowing I was stupid for even attempting to change T.J., but my heart felt differently, he was still a human being and a good friend of mine just down at his worst. "That's what good friends are for" I laughed back at his remark, not wanting to take this conversation too much further. "I admire your loyalty at least, but take my word for it, he will hurt you again." His words were chilling but true, I had to find out for myself though.

Almost seeming like an actual friend for a second he ruined his brief momentary image by turning over from the unfinished massage that I was giving to him and acquired his sexual longings from my worn down soul. Not only did he know that I didn't want to endure any more demands tonight, but his energy enhanced from knowing it too. Looking up at him during the foreplay, it was an easy observation from the look in my eyes

that I hated every minute of it, seething through all of my duties until he climaxed.

Most days I could take this kind of treatment, it was only seldom I couldn't hold in the way Jeffrey disregarded my feelings. He had me just where he wanted me, like a pawn piece on a checkers board I was his own personal sex slave. For the remainder of the evening I stayed quiet, not sure of what to say after an episode like that. It was a vigorous display of how humiliating he could really be. He required me to clean up his spilled semen off of his genitals with a wet warm washcloth before he retired to his bedroom for a good night's sleep. Only a monstrous creep could sleep easy at night knowing what pain he caused others.

I went downstairs and asked Juan, who was still in the kitchen to pay me for the evening telling him that Jeffrey had gone to sleep for the night. It wasn't an unusual request. Juan would often have to fix up "the girls" after the sessions and sometimes even drive them home. He went to Jeffrey's desk and underneath was his duffel bag that always held insurmountable bundles of crisp hundred dollar bills. He took out two for me and handed them over. I thanked him and said goodnight, as I was always polite to Juan and his wife, Maria. His eyes were gentle and told me more than what he was allowed to say. I understood well. We all needed to eat and pay bills unfortunately even sometimes at our own moral expense.

Putting the keys into the ignition I started up the engine and reversed out of Jeffrey's driveway with promptness. I didn't want to be there a moment longer than I had to. Not much to look forward too getting back to my apartment either, I needed some time to filter my emotions.

Parking my truck in front of a nearby beach I took my shoes off gradually stepping out of the door into the fog. I walked down to the edge of the sand where the water licked at my toes. My life was slipping away from me and I was really beginning to question the difference between living and dying. I was so tired of everything, my whole existence revolved around being everything to everyone, forgetting about being something for myself altogether. Pretending to be someone else became an attribute I was better than good at, probably much of why Jeffrey liked me in the first place. This time I held back my tears back and only let the anger fester into a deep pit in my stomach. My rage was aimed at the very people who abandoned me to fend for myself in the first place and accepted this life as normal for me, my parents.

When I got back to my apartment I was expecting to have to look after T.J., but to my surprise he had come around good that night. He greeted me at the door and asked how my evening was. "It was all fine" I easily lied. I never let anyone inside close enough to see my vulnerabilities. They were mine alone to battle. In my head they were too shameful to

talk about anyways. He wanted to talk about something else anyways. Sitting me down at the dining room table he began his spiel. "I know you don't think much of me anymore, how could you? I'm a junkie who steals and sells drugs for a living, but I promise that's all going to change now. Adam is dead because of me and the only way I can make it up to him is to get away from it all. I promise things are going to get better." It was a convincing talk, but I knew him all too well. His demon inside yearned for him to fail but who was I to second-guess him out loud, I could only try to give him hope. "No one is perfect T.J. At least you're trying now and that's all that matters to me. I am so proud of you." I gave him a sincere hug and kissed him for the first time in a long time. "I love you," he said to me and I returned my love back. We slept in the same bed together that night and were officially back on together.

Two days later I was gone again, beckoned to be in Santa Fe. Ghislane only told me that I was to meet someone there, not sure of whom that was. It wasn't my place to ask questions. As far as I knew it could be anyone and I had no choice but to be compliant to their needs. It was the middle of the day when I arrived at the airport. One of the ranch hands came to pick me up in a big work truck that smelled like dirt and sweat but I didn't mind that's what I loved about the countryside.

When we arrived at the mansion my guest was already there waiting for me. I couldn't wipe the look off my face as he turned around from the bookshelf that he was standing at. "Hello" that same old cheesy grin greeted me once again. It was his highness Prince Andrew, and what a sight. He wrapped his arms around my waist and greeted me like an old friend. I hugged him back rolling my eyes at the same time, already dreading what lay in store over the next couple of days. My job was to entertain him endlessly, whether that meant having to bestow him my body during an erotic massage or simply take him horseback riding. For the next couple of days he was to be my only concern, but he wasn't. I called in checking on T.J a few times a day, not wanting to be a nag but just hoping he hadn't had any thoughts about relapsing. He was doing great, even applying for a couple jobs. Being reassured by him made my time away less complicated and thankfully with the help of my ever-ready Xanax I was able to cope with the ordeal.

The mansion was completely empty save a couple of maids who also cooked our dinners for us, and a couple bodyguards that we hardly even saw at all. The time dragged by slowly for me as I was counting down the hours until I flew away again, anywhere but here I thought. It wasn't easy meeting the sexual desires of these strange men, the Prince being one of them. He loved my feet and even licked in between my toes. Then there was the lack of passion in the intimacy we shared, to him I was just another girl and to me he was just another job. Not the right reasons to be

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together but I thought in this world and to these monsters, there didn't need to be a reason. To them it's nothing but a reenactment of their personal fantasies. To me it was a living nightmare.

Thankfully one of Jeffrey's assistants from New York called me on my cell phone early in the morning on the second day to fill me in on my next adventure. I had a flight booked for me to leave that afternoon to arrive at La Guardia airport in the evening. Even though I had to go back to yet another controlling man, I was still relieved. At least I was used to the confinements of Jeffrey's control and in some twisted way he was more comforting than these strangers he sent me to. Overlooking the city of New York as the plane landed felt like I was flying from one cage to another. Entrapped by falling victim to the predators that lured me into their enclosure. I didn't know how I would ever get out again. That deep pit in my stomach began to churn again, a physical reaction to the anxiety I was plagued with. Before getting off the plane I touched up my makeup to hide any signs of the frailty I was feeling.

Jo-Jo met me at the arrival terminal and picked up my luggage for me. He never said much at all, nodding to any reciprocating conversation. I don't think he could really speak that good of English anyways. It was better for me as I preferred the quietness for the moment. He opened the back door for me and we headed off for my next prison cell. When we got to Jeffrey's mansion on 72nd, the place looked empty. I walked up the staircase to Jeffrey's office and he wasn't there. Feeling a bit hungry I walked back down to where the kitchen was. I opened the fridge and found some leftovers that Adam, Jeffrey's chef, had cooked. I loved his cooking, when it wasn't filled with beansprouts and tofu. He used to make me the best pizza upon request, or whenever he was cooking seafood, which he knew I hated. He had an honest appeal about him and never even took notice when on many occasions us girls would be prancing around topless, sometimes even stark naked around the pool or beach. He would have to serve us our meals and would do it with such a casual professionalism, never making anyone uneasy at any occasion.

Half way through my meal the kitchen doors swung open and incoming was Jeffrey and Ghislane. Choking down my bite of food down, I got up from my seat and kissed them both on the cheeks. "Hi guys, how are you?" I greeted them and Ghislane answered for them both "Good, good. Sit down and finish your meal, don't let us interrupt you." I hated eating alone in front of people, chewing food and maintaining a conversation at the same time didn't give off the best look. "I was just finishing anyways, can I get you guys anything, maybe a tea or something?" Always playing my part, another reason to keep me around I guess, I went beyond the call of duty and after the last period with them, I had been reminded of my place. "Yes, I'll take a one" Ghislane stated. "Jeffrey how about you,

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anything I can get for you?" I asked again and he answered, "No thanks, we just ate and I'm still full" and they sat down together on the stools at the kitchen bench.

I got out the shiny red kettle from the cupboard, knowing my way all too well around the kitchen and put it over the hot stove plate. Turning around to face them, I thought they were acting peculiar. "So..." Chislane started the conversation, "How was the ranch with the Prince?" It was a natural reaction for me to blush, knowing exactly what she was referring too. Keeping busy preparing her cup of tea and avoiding eye contact with both of them I started to unpack the counter where I had been eating, "I think he had a really good time, he seemed relaxed during the trip and when we said good-bye to each other he gave me a kiss." I went on to tell them what we did together "I took him horseback riding, nowhere to far just around the property, um... we went swimming in the pool, and of course I gave him plenty of massages. He had a massage at least couple times each day really seeming to enjoy his time there." It's what they wanted to hear, not the truth of how disgusting I had felt over the whole thing but they already knew the truth anyways, it's what they had trained me for in the first place.

Like two proud parents they both looked over me with such content. "Good, you did really well" Jeffrey complimented me. Turning around to the boiling kettle, I finished Chislane's tea for her and the conversation led on to other subjects. We all ventured up to Jeffrey's office and out came the infamous duffle bag that went wherever he did. I was given close to a thousand dollars for my time in Santa Fe, more than what I thought anybody at my young age could make for a couple days of work. It was fulfilling the obscene vulgar needs of the so-called privileged that earned me so much.

Chapter 18

I spent the next few days in New York, venturing out to do some shopping therapy. I loved the eccentric parts of the city. Every street was different but the same energetic vibe filled all of them, animated with all different walks of life. Hanging out at coffee shops reading the newspaper or a good book was a favorite pastime while in the big apple. Being close enough to get back to Jeffrey for when he needed me but also far enough to get away from all of it. Most of the day slipped by without being missed and I made my way back to Jeffrey's.

Making one last pit stop, I walked into an old bookshop to browse at their assortment of old titles. I wasn't in any hurry so I took my time

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reading the backs of interesting looking books. I bumped into a girl looking down the same aisle I was down. "Sorry, I'm so clumsy" she was apologizing for my mistake. "No, no, it was my fault, I wasn't looking at where I was going. I got so wrapped up with my nose in a book and trip over my own two feet if I'm not careful enough." We were both giggling now and I further introduced myself to her. Her name was Valerie or Vickie or something like that, anyways she was a student at a school for hairdressing nearby. Chatting away both young and similar interests in each other's choice of reading we found it easy to speak with one another. She wasn't from around here only being in the city for the last two months, her parents hated her being here, but were also supportive in her big decision to move from the countryside in hopes of her accomplishing her own dreams. Aside from not having her near them, they just wanted her to be happy and supported in her big decision to move to the city, helping her pay some of the way.

She was a pretty girl with cherry red hair and soft white skin. Her long legs were emphasized by the short flowery dress that complimented her hourglass figure. She would definitely fit the pro quo for going down in one of Jeffrey's little black books. Only imagining the look on his face upon meeting her I could already see his sly grin spread from ear to ear. Knowing exactly what he would do with her and the very thought of him tarnishing a sweet country girl such as her just couldn't be done. It was the beginning of a turning point in my life that started with realizing I had a choice at hand and the effect I could have on one person alone. "I must be off, but it was really nice to meet you." Bidding her goodnight and paying for my books I turned around with one last glance over my shoulder and said, "Good luck in the city!" Leaving that bookshop was a small step in a growing abundance of larger strides to come. Turning the corner onto 72nd street I had an undeniable feeling in the pit of my stomach again but this time it wasn't the familiar hurl of anxiety I was used too after I had done something I had wrong that I had regretted, it was a new feeling of pride and inner strength. I quite liked it a lot, I held my head high and smiled on the inside when Jeffrey asked me how my day was and what I got up to, not mentioning I had let one girl slip on bye.

The icy winter winds faded away making way for the approaching sunny days that blossomed the colorful shades of spring. This was my favorite time of the year. Making the most use of his island we spent countless days of the increasingly hot days there. A constant array of visiting guests and plentiful young women to flock around keeping them entertained was the typical lazy afternoon on Little St. Jeff's. We ate, drank, and played under the blue blanket of cloudless skies. To many this lifestyle could seem idyllic, unless you were like me, the one on the other

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side of the fence where the grass wasn't so green. Fortunately for me and in some ways not, I was mostly expected to attend to only Jeffrey's insurmountable of sexual desires. Whereas the other girls who came one day and went the next were promised a multitude of open doors just for there meager participation in sexual acts with random men, only to be disappointed when they realized they were nothing more than a single night out for these geriatric senior citizens who most likely due Alzheimer's would sooner forget the entire experience let alone their first name.

Surrounded by those in our world who many looked up too but not seeing them from where I was standing, I didn't have the highest of standards in humanity. Then I met Al Gore and his lovely wife during one of those many weekends away in the Caribbean. I was blown away by the amount of attention Al doted on his wife, it was so sweet to watch. They sat next to each other at the dinner table gazing into one another's eyes having an intimate conversation between them. Among the many guests visiting that night and many of them young beautiful women, not once did Al's eye's stray elsewhere, to them they were the only ones there. He was up for a presidential election that year and he definitely had my vote. Anyone that could show that much devotion and passion towards his loved ones could have the same devotion towards running a country, or at least I thought so. He only left his wife's side to have a walk down to the beach with the host of the weekend, Jeffrey. The idle chat around the table and take a stroll too.

Not wanting to interrupt the conversation between Jeffrey and Al, I walked in the opposite direction plucking the washed up sea shells imbedded in the sand along the way. I enjoyed the serenity in the solitude of the island. So many nooks and crannies to get lost in, I could imagine that I actually disappeared from the entire world for a moment. By the time I came back to the main house majority of the small crowd had been long gone retired to their cabanas. Even Jeffrey had gone off to bed but trust party animal Ghislane to still be up entertaining the remaining guests left at the table, regaling her wild stories of people and places she has embarked on. Trying not to make eye contact as I walked past them on my way back to my cabana carrying my seashells inside my curled up blouse, I wasn't up for anymore pointless talking tonight. Emptying out my seashells into a plastic bag, I went over my new treasures one by one. I loved collecting odd things, shells being one of my favorites.

Ghislane and I shared that interest together. We would enjoy walk abouts around the island searching for lost pieces of the remnants that pirate's had left behind centuries ago. It was mostly broken plates or smashed glass from bottles of ale, and even occasionally getting lucky

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enough to find some old coins here and there. It wasn't easy though, both loving a challenge it was perfect for us. Enduring many scratches from the bushes we would be searching through and then the soar arms from digging all day, but it was worth it in the end. After nearly two years of collecting items and saving them, we made Jeffrey a mosaic table out of the remaining pieces left from the era of the pirate's day. Upon completing it we were both astounded in our creation, it was such an item of rarity and an interesting piece of work. When we presented it to Jeffrey he was even impressed not only in our amazing finds but what we did with them. The table became an important work of art that Jeffrey showed off inside the main house's lounge room, sparking a much intrigue and table conversation by many of the visiting guests to his island.

The next morning was good-bye for most of the visitors, leaving just the usual behind. Soaking in the sun and living it up in the lap of luxury is how the next few weeks were spent before having to get back to the dredge of the city. Sometimes we'd have to go to St. Johns island for Jeffrey to do some work in the office. It was so boring for me to sit in their listening to him on the phone or coming down on some poor employee for something stupid like not answering the phone correctly. If I knew he was going to be awhile I would excuse myself for a bit of shopping. Not that the Caribbean had much to offer in the world of fashion but there was never an amount of bikinis one girl could own and I loved all the little knick knacks one could find there. Flying back on a private jet was the best part because I could transport just about anything I wanted back to my apartment, which was already filled with an assortment from my shopping ventures and collection of seashells from the Caribbean.

The next big dinner party on the island had another significant guest appearance being, the one and only, Bill Clinton. He is the only president in the world to be dismissed from his role as a world leader because he was caught with his trousers around his ankles and had the stain to prove it. Publicly humiliating his wife and himself he retired from his title but not from his lifestyle. This wasn't a big party as such, only a few of us eating at the diner table. There was Jeffrey at the head of it all, as always. On the left side was Emmy, Ghislane and I. Sitting across the table from us was Bill with two lovely girls who were visiting from New York. Bill's wife, Hillary's absence from the night made it easy for his apparent provocative cheeky side to come out. Teasing the girls on either side of him with playful pokes and brassy comments, there was no modesty between any of them. We all finished our meals and scattered in our own different directions.

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Jeffrey wanted his evening massage before bed and Ghislane and Emmy went to their office to talk about something, leaving our guest of honor to find company elsewhere. Strolling into the darkness with two beautiful girls around either arm, Bill seemed content to retire for the evening. He wanted to have a hot bath before bed while I began the massage in the tub. Starting with his feet and calves, he wanted to end the night quickly. Never showing any restraint he sat up on the edge of the tub and asked me to preform on him orally. I did my job, but that's all our relationship was these days, a dreadful job. Getting it over and done with as quick as possible was my hope but I couldn't let him pick up on those vibes, to make him enticed I had to act like his little porn star, knowing exactly how he wanted it. Only then would my duties be fulfilled and I would be able to get back the reality of my complicated life. Before I could say goodnight, Jeffrey had one more request. He wanted me to tuck him under the blankets and fluff his pillows for him. Then I had to reach under the covers and massage his feet while watching him fall asleep, he even wanted me to wait like twenty minutes or so after he fell asleep before I could leave. It wasn't unusual for him to ask it but God I hated it, never offering it I would always wait for him to request it. Once he was snoring gently I wiped my hands clean of the lotion and quietly closed the doors to his room. Making my way up the outdoor spiraling staircase, I felt the breeze blow through my hair and looked up to the heavens. The stars shown so bright out here in the middle of nowhere with no big city lights to hinder their effect I could get lost in time staring into them. No matter how far gone I really felt there was always something about a simple caress from the wind or the reflection of the star sweeping sky in the black glossy ocean that would always remind me of my fond love of nature's blessings.

Back in New York, there was nothing left of nature to adorn. It was a dwelling for those who no longer saw the use for trees without cages or blue skies without clouds of man made fumes and gases. Unfortunately if we weren't in the Caribbean, we were there in New York. Hardly going back to Palm Beach, barely even seeing my family, my dog or T.J these days at all. In my parents' heads I was all grown up and educated in the world of wealth not needing them any longer they would just wait for my call once in a while to let them know how I was doing and that was the extent to our restricted relationship. The road my life has led down never has kept me close to home anyways so to me it wasn't anything extraordinary but still a sad existence to be without a family of my own. It would've been nice to be missed though, rarely letting myself think like that. No room for pity in my heart, if I did, the floodgates could open and I'd have enough grief in one lifetime to go around a few times that they would've never been closed.

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Jeffrey's business was running well from the looks of his attentiveness the office he owned in the Upper East Side of Manhattan. Alan Dershowitz, his colleague in finances and personal solicitor, a bird of the same feather, I had seen hanging around the island and Jeffrey's Manhattan mansion, more and more these days. Alan's taste for the young and beautiful was a bias for a blooming business relationship between him and Jeffrey. After an explicit session of Jeffrey's vulgar pilgrimage into my body, we were interrupted by a knock at the door by Jeffrey's good friend, Alan. I wrapped myself up in Jeffrey's pink bed sheets, which is the color preference he chose to sleep in because it reminded him of the same color of his own words "Pussy", and covered my face from the unexpected intrusion. Jeffrey got up and wrapped a towel around his loins and answered the door completely calm. Opening the bedroom door and letting Alan inside they began to converse about business immediately, right in front of me. Jeffrey started to tell Alan what needed to be done while he jostled some notes down quickly. I pecked my head from underneath the covers thinking they were too wrapped up in their work to notice me get up and dressed, and Jeffrey turned back to me and told me to just stay there this would only take a second. Going back to Alan he turned his focus back into work and hustled out a few more orders before letting Alan out of the door and returning his attention to me.

"Sorry about that, work never stops and neither will the money coming in. How else am I going to make a million dollars while I'm sleeping?" Jeffrey chuckled as he sat back down on the bed next to me. I laughed at his humorous and mostly true statement, then a strand of hair fell in front of my face. Before I could get to it he put it back behind my ears and sweetly stroked my face, for a moment we just looked into each other's eyes and he nearly seemed almost human to me. It was bizarre how he could be so kind and gentle one moment and the second beforehand I was being treated like no more than a common plaything left out for display. Nothing more than an ego trip, Jeffrey got off on letting the ones he wanted to know that he could own anything and anyone he wanted in this world. Maybe for a brief minute I believed the sincerity behind his eyes but that vision would quickly fade away and I would be left second-guessing why I even fell for his deceitful tricks for a moment.

Jeffrey got up from the bed and asked me to join him for a shower. In his bedroom, which was the entire top floor, he had a glass shower enclosed underneath a glass skylight right in the middle of the room. It was perfectly accessible feature for a man that loved both being clean and nude, but still an odd feature at that. As I always did whenever I showered with him, I lathered a loofa with soapsuds and would scrub his body, up and down, in between his toes, even behind his ears and of

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course his genitals area. The sunlight shown through the glass ceilings into where we were standing, making the moment feel even more surreal on top of the already popped Xanax I had popped before for breakfast earlier that morning. Jeffrey was in such a lighthearted mood that day, making funny cracks at me, and acting like a flirt. When I was finished washing him he actually wanted to wash me too, which was another totally out of his character suggestion.

For the rest of the day, he took me everywhere with him, the office and then to a friends place, even just wanting to hang out with me for a while. I wasn't used to being treated like anything more than a dog on a leash, when he acted like this it just completely spun me around confusing me even more.

We were spending heaps of time together these days, a lot more than usual. At the ranch we would do things together, alone, and not just the usual perverted things I was accustomed to doing with him alone. Horseback riding on his ranch during weekends away by ourselves and movie nights snuggling up over a bucket of popcorn instead of having to massage his feet during the entire film became his way to alter my perception of my original notion that I wasn't just his sex slave, I thought I was finally becoming his friend.

When we went quad biking he no longer wanted me to take my own bike, he preferred me to sit on the back of his, holding onto him tightly and he even tried to teach me how to drive a manual stick shift car. He was definitely trying to show a softer side of himself, different to the stone cold slave driver I had to come to respect out of fear over the many years. Still a hard image to change after all I had been through and seen over the years I had been with him. Nonetheless he was still my "boss" so I humored his attempts and matched his caring demeanor, giving him the impression I was intrigued in our new kind of affair.

Chapter 19

His attentiveness led into the warmer months that commenced the beginning of long summer days that I looked forward too. I couldn't help but enjoy his eagerness to see me more relaxed these days. He wasn't even bothering me to find alternate sources of girls for his twisted satisfaction anymore and although I was still being used for his distorted sexual enjoyments he further seduced me into believing I meant a lot more to him than I ever did.

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It all came to a sudden conclusion one sunny afternoon in the Caribbean. Jeffrey pulled himself up to the ladders first step and climbed up the next four steps to the top of the dock. His chest was heaving rapidly as he sat down catching his breath. Ghislane was the next one up and then I followed lastly behind them. To me it was an invigorating snorkel around the shallow reefs within the radius of the dock, but to Jeffrey the half an hour swim in the ocean was enough to overexert his ageing limbs. I took off my snorkel gear and placed it in the storage bench, grabbing us a few towels at the same time. Wrapping a towel around Jeffrey's backside and handing one to Ghislane, I sat down next to them on the dock and we laughed how fatigued Jeffrey was, poking fun that he really is getting older. A very touchy subject for the vain at heart but he didn't seem to mind it, probably knowing we'd never take the joke too far. We sat there in silence for a moment, an odd silence at that. Jeffrey looked at Ghislane and then Ghislane looked at me, placing me once again in the spotlight. They both scooted closer to where I was sitting and I felt something stirring in the air. The biggest turning point of events in all of my time spent with them.

Jeffrey sat next to me and put his hand on my back and looked at me with a certain kind of sincerity I hadn't seen in him before. "I want to first of all tell you that over the last few years you have shown me the kind of devotion and loyalty that I believe is rare to find among people these days, qualities I hold that high in regard." Bewildered by the whole scenario I just nodded every time he paused, trying to grasp what his intentions were getting at. He continued to praise my nature saying "I hope you know my appreciation for your embracing of my lifestyle, you have been achieving a name for yourself among the friends I have introduced you to. Everybody says basically the same thing about you, the same thing I believe. You are a delightfully funny girl who has developed into a mature graceful young woman and I could think of nobody else I'd rather have a child than with than you."

And just like that he created a whole new dilemma for me to face. In utter shock from the completely unexpected proposition and before I could even think of anything to respond with, Ghislane made the finishing touches with the business end of the deal starting with the pros before the cons "You would have around the clock nannies to help you. Jeffrey would pay for a mansion of your choice in either Palm Beach or New York" and as if the drumrolls were beckoning "and... you would have a hefty monthly allowance from Jeffrey's bank account." Astonished at their first offers I nearly took the bait. Then she continued to finish the terms of our pre-agreement with "But you would have to travel with the child where and when Jeffrey wanted you to be, and most importantly you would have to sign a contract stating that Jeffrey and you are not

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monogamous and that the child would belong in Jeffrey's custody in the event of a falling out between the two of you." She kind of threw that last one in there quickly, as if she could get away with me not hearing that I would basically have to relinquish the rights to my own flesh in blood and surrender them to a life of servitude and abuse with these people. My maternal alarm bells went off straight away and I already knew my answer. No way I could I do that to any poor baby, God only knew what these monsters had in store for me let alone a baby, but it was an instant reaction that saved me. "I don't know guy's, I mean I'm really young and never really even thought about having kids yet. Wow, I just don't know." I slicked my hand through my hair nervously and took in a silent breath. I had to go beyond what I was truly feeling and give them the feeling that I'd never let them down. Putting an eager smile on my face and sucking up my gut's intuition I told them "You know what, let me get my certificates in massage and have some time to prepare for this and get healthy then next year we'll all think about having a baby together." It was crazy to even hear me say out loud but from the expressions on their faces I had fulfilled their wishes.

Much reason to celebrate that night they were both in a cheery mood around the dinner table. Except for me who had taken double the dosage of Xanax to even cope with the high amounts of anxiety I had been suffering from since we got back from the dock. I wasn't sipping the champagne that night, I was gulping it and when their moods turned from cheery to raunchy later that evening it wasn't hard for me to comply. From the full effects of the state I was in I would've agreed to just about anything, allowing them to treat themselves to ravishing the tender parts of my body.

Over the next few weeks everything went on as it normally would, and not another mention of their proposal. My birthday was only a week away and I was turning nineteen that year. All I wanted was to get my certificates before I got any older and get trapped into this life for good. When my big day rolled around I was in New York with Jeffrey and Ghislane. Sitting on my bed listening to MTV's channel blare in the background of my room I was painting my toenails when I was suddenly buzzed on the intercom. It was Jeffrey calling himself to ask me to meet him in his office in ten minutes. Perfect timing to let my nails dry I thought to myself. Already contemplating his desire to come downstairs I knew it had something to do with my birthday present but I was more expecting the usual shopping money or piece of jewelry, definitely not what he had in store for me.

I knocked on the slightly ajar door to Jeffrey's office and heard him beckon me inside. "Hello, what cha up too?" I asked in a cutesy tone of voice. Walking over to his desk he looked up at me taking his reading

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glasses off while granting me a big smile. "Come over here and sit down with me" as he ushered me to come sit on his lap. Pulling me onto him he had a funny look on his face, like he had something really big to tell me and was letting the anticipation build in the thickness of the silence. "What???" I laughed at the way he was looking at me now. "First of all... Happy birthday today." Was only the beginning of his announcement and he proceeded to tell me "I know how much you have wanted this for so long and you are more than deserving of it. You are going away to Thailand to learn authentic Thai Massage and within eight weeks you'll receive a certificate for being a qualified Thai Massage Therapist." Astonished at his attempts to see me get what I wanted, not exactly the type of massage I was interested in but it was a start and a first certificate for me to acquire. My eyes lit up and I threw my arms around his neck, planting a big kiss on his lips, which I rarely ever did.

"Wow, I don't know what to say, this is beyond my wildest dreams... thank you so much!" I did well to let him know I appreciated his grandeur offer. He went on to give me the details of where I'd be staying, the school's schedules, and how much he loved Thai massage, apparently it was the next big thing to hit the shores of America. He had planned out an entire itinerary for me. I was to depart at the end of August and he had already enrolled me in a class at "JTM Massage School". I would only have a few days to settle in before I would be attending classes five days a week over eight hours a day. He even had an assignment for me to do while I was over there. I was to meet up with a girl who was also being put up at the "Princess Hotel" where I was staying. She had an Asian sounding name so I just assumed she was a local girl hoping for an opportunity of a lifetime, if she only knew what she would be getting herself into. If I decided that she met Jeffrey's

particular quota of approval then she would be sent over to the U.S to meet with him or one of his esteemed colleagues. Besides the guilt of having to decide a stranger's uncertain fate, everything else sounded more than wonderful. Eight weeks gone from Jeffrey sounded like a lifetime away and I couldn't be more excited at this chance. It was the opportunity of my lifetime and I wasn't going to waste a second of it. Ghislane came in a few minutes later and the look on her face told me she already knew. I got up from Jeffrey's lap and gave her a big hug and told her, "This is so nice of you guys, Thank you so much!" She didn't share my enthusiasm of excitement. In a dull tone she responded, "I didn't have a thing to do with it, it was all Jeffrey's idea but good-luck anyways." She gave me her best impression of being human for a brief second and hugged me back. It was just her way and I had come to accept it. Depending on the level of slander her insults provoked was just her way of telling you she cares without really ever showing it. Probably

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doesn't make sense to most sane people but after all of the time spent with them, I had gotten to understand a few of their quirky ways. Even if I didn't agree with them, they knew I would for their sake of opinion. What did it matter anyways I thought, I had been degraded in every other physical way what's the difference from taking their mental abuse too. Not the exact choice of employers I would've chosen over again if given the opportunity but here I was and doing my very best to excel at their demands.

I was sent home for a little over a week to pack for the long trip and make the rounds visiting my family before I left overseas on my first trip all by myself. It was great to see my family after such a long time away. My older brother and his wife even came down to visit for the well wishing of my departure. Everyone in my family seemed stoked at the prospect of my long journey had led me down. Here I was jet setting around the world in my teens and getting paid to study the course of my dreams at a cost that I only knew I would have to pay. It was a wonderful get together with all of them around, a great way to remember them. If I'd only known it would be the last time I would see any of them I would've emphasized to my brothers how much I really loved them both and how much I would miss them in the decade to come! But I didn't know what my future held for me, I had nothing planned out I was just hoping for the right opportunities.

I also had a few good friends to catch up with before I went. Every night was another party and by the end of the week I had drunken enough to drown an Irishman on St. Patty's Day. I was given the lists to all of my friends email address and told to keep in touch. Yeah right I thought, I was going to be too busy having too much fun to be thinking about sitting on a computer emailing people, but I told them I would anyways. Save myself the point of having to explain that in many different ways to a group of already tipsy slurring teenagers. Out of everyone who was really happy for me, T.J. wasn't. He hated the idea of me leaving him to have a non-stop party in Thailand without him. He was just starting to seem like he was coming good and I didn't like having to leave him at such a vulnerable state but in my young years I had already realized I needed to do some things for myself and this was one of them. There was still a huge amount of broken trust between us, trust that could probably never be rendered again so I thought I was being decent enough letting him stay at my apartment while I was gone, but he was not to drive my truck, at all. I paid too much money on insurance for that thing and knowing his driving record I didn't want the risk of something happening while I was gone for so long. He didn't agree with me at all, throwing a grown up tantrum all over my apartment. Hitting the walls and doors, shouting the entire complex down, there was nothing I could say or do at this point in

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time so I just put my dog on the lead and took her for a walk to calm down the situation and give me some time to be alone. Mary Jane was the only one I hated leaving behind. When we got back from the long walk she barricaded my suitcase while I was packing the horrendous amount of clothing that I always did. I was promising her I wouldn't be long and told her how much I loved her giving her a big hug. I choked back on the tears that were swelling up in my eyes, it was like she already knew the night before I flew out to New York that this would be my final trip.

There was a commercial flight booked for me in the morning and I needed the rest that night to fully recover from my binge of celebration drinking. T.J. crept into bed later that night and tried to redeem his behavior with sweet nothings and dry humping my backside. It did nothing for me sexually. I didn't feel like that for him any longer and the sooner he realized that, the better he'd be off. I told him I wasn't up for it and he picked up a pillow and slammed the door behind him. It didn't matter I told myself, the next day I was off and wouldn't have to deal with him or anyone.

T.J. caught a cab with me to MIA, the airport in Miami. He walked with me to the furthest point he was allowed to go by the security gates and as we stood in line together it was almost heartbreaking seeing him cry. I told him I'd try to call him everyday, attempting to give him optimistic ways to look at this time away from each other. In the end he had me crying and I had to give into my remaining feelings I had for him. One last kiss under the x-ray bridge and he vanished out of my sight as I furthered down the terminals long hall.

Chapter 20

It was only a short flight to New York and I just couldn't wait until next week when I'd be jetting off to an exotic destination all by my lonesome self. It was all I could think about talk about and dream about, finally my break. Ghislane did what she did best that week and prepped me for everything I could imagine under the sun. Do's and Don'ts, emergency numbers and western union locations were among some things on the list she gave me. Like I said, she showed her caring side in other ways. There was also the name of the girl I was supposed to be meeting, the room she was in and what dates she would be staying there.

When I got out of Ghislane's office I was instructed to meet Jeffrey in his office. She had to stay back for some paper work that she had to catch up on pronto. Making my way up the red and gold trimmed carpeted

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staircase I prepared myself for some major sucking up before I left, he would be expecting it for his recent generosity, or so I had thought. Opening those familiar heavy doors the first thing I saw was an unfamiliar face standing over Jeffrey's shoulder.

She was a tall girl with blonde hair twisted up in a professional looking knot. Her big smile was flashing at him with hints of her cheekiness to come and she was dressed to kill with a short tight grey skirt and a matching suit jacket over her white buttoned down blouse, revealing her voluptuous ample cleavage. She looked like the old college professor's wet dream. When she introduced herself to me, a thick Czech accent presented itself. Her name was Nadia Marcinkova and Jeffrey looked just about as smitten as a victim of a love struck arrow from no one but the cupids themselves. Jeffrey further introduced her as his new assistant and masseuse while I would be away, barely taking his eyes off her for one second. It was a bit of a blow to take, being so easily replaced but also a part of me already knew this was expected off someone like him. Good for him I thought to myself, why should I have bitterness over someone I never had intimate feelings for and knew had never really cared for me in the first place. Kissing her on the cheeks and telling her my name, I was doing my best to grin and bear it. We hugged for a brief show of uniformity but it was just that, a show for Jeffrey to see. When he was away for the moment or she wasn't busy hanging off his every word, the way we all started out, she would snub me off to only head off in another direction. A real bitch if anyone was to ask me but no one would anyways it wasn't my job to like her.

Over the next course of days it was my task to show her some of my techniques in massaging Jeffrey and the erotic side of finishing it off. Nadia despised me even more when Jeffrey told her to follow my lead during the massage as she tried to take over and do her own thing a few times. To me it was quite funny her competitive side, I had nothing more to prove so watching her put on an act of seduction and scream out her every body function during a faked orgasm was nothing but entertaining in my eyes. After a few sessions together it was my time to be off on another adventure far, far away from here or from the chains that I wore for way too long. Jeffrey had someone else to fit the chains that kept me so close to him. Even though she wasn't the nicest of girls I still couldn't help but feel sorry for her. No girl should belong to someone out of servitude, but unfortunately it is the way our civilization has been for many centuries before us and I don't see changing any time soon or as long as perverts like Jeffrey are allowed to walk around freely and procure our daughters off the streets all because he's got a lot of money to pay many, many, many people off.

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Throw out your confetti because here I come Chang-Mai!! My celebrations started the second I landed, it didn't take me long to make myself acquainted with a few fellow travelers and find the hot spots of the hustling city. It was like nowhere I had ever been before. The streets were lined with stalls offering an assortment of souvenirs, clothing, and knick-knacks. Everyone lived so freely and was in such great spirits. The parties raged on until the wee hours of the morning and people became best friends over night. From the second I got there I knew Thailand was going to be a lot of fun and I was right! Popping bottles of champagne, dancing all night to the beat of every club's rhythm's along my way and carrying on like it was my birthday...every night was a repetition I could definitely get used too. During the day I was a real good girl, the teachers pet even. Showing the credibility of my experience in massage from over the last few years and already ahead of the class the teacher was using me to help instruct the others with demonstrations. Mostly in a class full of males it wasn't a surprise that I made friends with quite a few of them, some of them with ulterior motives, but for the most part the sleazebags were none of my concern, I had already dealt with a lifetime of them to be able to spot one out and steer clear of his approaches. Out of the entire class I had made friends with only one girl from Wisconsin. She was a plain looking girl with big brown puppy dog eyes and a long drawn out accent. Her first time leaving the States or Wisconsin itself for that matter so it was easy to acknowledge that she was a little taken aback by all of the bustling city life so becoming her friend felt like I was doing a good deed showing her around the hot spots of the Chaing-Mai nightlife. Eventually I even ended up inviting her to stay with me at my hotel. She was running out of money to party every night then pay for school on top of her accommodation, it was all becoming too much out of her small budget. So I thought about it and offered her a bed in my room, I had two of them anyways. Plus she was a really nice girl and if I could help make her first time out of the country an unforgettable experience then I was also gaining something from it as well.

The first month in quickly passed me by. Having such an incredible time on my own and putting my heart into learning Thai Massage it seemed to just fly past. Routinely I had to call in and check in with Jeffrey and Ghislane letting them know my whereabouts and progression in class. Counting down the time left until my course finished Jeffrey was anticipating my departure back to New York. "I can't wait to get my first Thai massage from you. I've got you booked to come straight back to New York for my first one as soon as your course finishes next month." His eagerness put a twisted familiar knot in my stomach. Reminding me of the dream I have to awake from soon and the reality of the certain homecoming I would be arriving to. "It's such a great course, thank you

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so much for sending me here to learn this. You are going to love my new area of expertise! I am having such an amazing time over here!!" I had to let him know how much I appreciated what he had done for me and he loved the head swell that it would make him feel as well. Hating the thought of going back to him, I wasn't going to let that put a damper on my spirits while I was still out there. It was my time to party harder than ever before. Every night was a new adventure for me. Chang-Mai was a maze of places to get lost in and the vibrant city was my playground. The way I saw it this was my last chance to get out and break free, letting loose my inner girl! It felt so good to take the lead of my own life.

Chapter 21

It was an average evening getting ready in front of the bathroom mirror on just an average Sunday, though unbeknownst to us girls as we sat there chatting away carelessly, this night was already written in the stars for me. It was a very long time ago now when I was still a young child that I sat looking up to those same stars from my bedroom window with my hands pressed tightly together as I cried for God to hear my prayers. All I asked him for was death. My precious life was already such a hopeless battle that I felt too small to fight alone for. Begging him to deliver me from this cruel world I would pray for all of my pain would to away for good. My only clause in my prayers was the possibility that there was somebody in this wide world that I was meant to love, something much bigger than I could have even imagined yet. This invocation of mine was forgotten about long ago now, until tonight.

I wish I had known that night I sat crying beneath the stars that it would all be different one day and that I hadn't sold myself short to the accustomed lifestyle I was brought up to believing was acceptable. It was this night my very soul was about to cosmically collide with the man I was always meant for, the man my heart already belonged to and would know from the instant we met. This night would be the first day to the beginning of my new life to come.

I blushed my cheeks and put on my mascara before me and my girlfriend headed out to hit the town. We were dressed to kill and looking for something to do when we ran into a few of our class mates at one of our favorite drinking spots. They were meeting up for some drinks before a Muay-Thai Kickboxing tournament. It sounded like fun when they invited us along to watch it with them. The massive crowd lined the street where the fight was being held and once I got inside the arena it was push

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and shove to try to find a spot to watch from. The friends that we were hanging out with were meeting up with another group of guys that were training for the kickboxing tournaments that we were watching.

Then it happened it was the first moment I laid eyes on the man that would love me for the rest of my life. I wasn't expecting the most amazing time of my life to happen right there and then but it did and I would never be the same again. Destiny fell right smack into my lap and there was no stopping it! It wasn't just his smoldering appeal that was obvious at first sight it was the entire package of mannerism and chivalry that made him stand out of the crowd. Stepping right out of the pages of the fairytales I used to read, he was nothing like I had ever come to know before.

Watching him from a close distance he was playfully shadow boxing one of the guys from my massage class and it was at that moment that this handsome stranger first caught me staring at him. From top to toe this athletically built man was intriguing to watch. I couldn't take my eyes off him like I was magnetically drawn to his power of attraction. He further interested me when he wasn't acting like the majority of harping dogs that would jump at the eyes I was giving him now. Instead he coyly played hard to get, making me work for any conversation with him. The fight started and the men were going bezerk, screaming at the fighters in the ring offering either fighter their support or discrimination depending on whom they were battling for. It was like watching a primitive scene out of the days when the cavemen ruled the earth but it was as equally alluring to watch unfold, the sweat, the blood and the absolute brut fascination of it all.

After the fight and all of the men revved up from the fight, I suggested that we all head to the pizza joint in front of the Princess Hotel where I was staying for a late night snack. I made it my goal to make myself known to this appealing stranger. In the tuk-tuk on the way there I made sure I sat next to Robbie. Scooting my knees closer and closer to him on the short ride he continued his chase by moving further away from me, a game of cat and mouse that I loved. When he answered back the array of my questions he had the cutest Aussie accent that drove me absolutely wild.

Gradually we got to know each other better over a pie of pepperoni pizza and two can's of coke. Too me he might as well have been the only other person in the restaurant, he knew he had my undivided attention and I think he liked it. There was no one like him that I had ever met before and I knew there was no other who could make me feel the way that I felt at the first sight of him. Being charming and suave was all an accidental front. It was easy to read him. Immediately it wasn't hard to see his sweet side, holding the door and pulling out my chair at the restaurant, I was

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already smitten. After pizza he walked me across the street to my hotel where we made plans to meet up again. There was no kiss goodnight or anything like that. No, he was too polite for that, he wanted to prove himself different and different he was. Walking through the hotel's revolving doors I watched as he walked away and when he was finally out of sight, I sung my way up to my room. Floating on cloud nine I was free falling into a deep pit of love.

The next day I attended my class as usual but not able to concentrate like I normally did, too excited about when I'd be seeing Robbie that night again. As I walked out of class that afternoon even the teacher noticed a difference in my performance and asked me if I was feeling well, "On top of the world actually," I smiled back at the old instructor and it wasn't far from the exact truth either. I hadn't ever felt the churning of butterflies in my stomach and the constant thoughts of anyone else like this before. My friend and I got a tuk-tuk back together as we usually did after school and I couldn't shut up about the night before. She was laughing at my girlishness telling me that anyone who just met me would think I had never been let out before, but little did she know that I had more than my fair share in experience with men and never had I ever come across anyone that could make me feel this way, and what spun me out even more was that it was such an instant attraction. Never considering myself a person who believed in the existence of "Love at first sight", but a true romantic deep at heart, I couldn't help but believe in it now. He is my walking proof of it!

Waiting for me in the hotel lobby was the very person I couldn't stop entertaining the thought of all day long, there he was looking ever so fine standing in front of me now. The whole entire world faded away and all that was left for the moment was this complete stranger I had only met last night but somehow captivated the very essence of my very heart. There was no need for me to try and act cool now. He already knew I was snagged hook, line and sinker. Smiling all the way up the many stories in the elevator up to my room he took notice of the posh décor of the hotel. "You should see where I'm staying, this is a royal palace compared to it!" His first impression of me he automatically thought I was going to be a spoiled high-maintenance girl that had money coming in from a parents hefty trust fund. Casually he got to find out through many deep and meaningful conversations that my life's grim story wasn't that pretty at all. For some reason beyond my knowledge I had the need to tell this stranger almost everything.

Wanting to be judged and looked down upon for everything about my life that I knew was wrong and being the first time I had spoken about my years with Jeffrey to anyone honestly like that ever before, I had felt like I had deserved punishment. He offered me no judgment, instead only

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gave me his warmth and compassion as he wrapped his strong arms around me, making me feel so meager and small but so safe at the same time. Encouraging me to see the worthiness of myself and leave that life behind, he adored me with a kind love that I wasn't accustomed too.

He took me in and made me feel so at home. It was like I had known him my whole life. I couldn't bear to be without him another second while I was away on this dream holiday. When he wasn't training for Muay-Thai tournaments and I wasn't in school, nobody would ever see us. Too enveloped in each other in my hotel room to care about anything else. Which is why I asked him to come stay at my hotel with me, seeing he was never at his own anyways. My girlfriend was soon departing back to Wisconsin, making my room more than available for him. Enchanted by his words and tender touch, the way he made love to me was again like nothing I had experienced before. Even down to after sex as I had been routinely instructed by Jeffrey to get up for a warm washcloth to clean his genitals afterwards, he refused it, telling me I was no longer a slave and that he didn't want me acting like one. He'd just rather lay down together afterwards and repeat our sweet nothings with many adjoining kisses.

On our third night together with nothing but the bed sheets between us, we had spent all night looking into each other's eyes sharing such an undeniable passion for one another. In the deepest caverns of my heart I knew this man would give me what I had never experienced before... True love. We were still laying in each others arms when the orange and pink sunrise began to rise slowly through the peak's of my rooms windows, enticing me to come feel the freshness of the morning's chill. Only the bed sheets were still wrapped around my body as I went to the balcony. It was overlooking the city in a valley surrounded by mountainous tops. My thoughts began to rampage through my head and I knew this could only be a dream for me. It was getting serious now, too serious for the life that I led back home. As if he sensed my anxiety Robbie walked up behind me and wrapped his strong arms around my waistline, gently kissing my neckline and pausing with his ever so thoughtful stares and gave me the exact opening that I needed to expel my thoughts. "Back home, as you already know, I am going back to someone else, it's my job, and as much as I really like you, this guy that I kind of see is going to expect me to be putting him first, I am so sorry to say all of this after such a wonderful few days we have spent together, but you need to know this thing happening between us can't get anymore serious than what we have for now. I am so sorry." I looked down to the floor with nothing else I could say to alter his perception of me now that I had told him the truth and it never dawned on me that thought he wouldn't be out the door before I could even finish my sentence but he

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continued to surprise me with his efforts to make me believe we were more than just friends with a summer crush. "You see... your problem is that you don't see what I am looking at right here in front of me, a beautiful girl who is completely lost in a game that she has no control over. Get out of it now, take my hand and follow me back to my home in Australia." I heard what he had said but I found it hard to comprehend what he was actually talking about. "What?" I asked him with a look of confusion on my face. "Your nobody's property, you can do this. Marry me." His statements got more and more profound as he went on. Repeating the question he got on one knee and proposed again "Jenna, I am in love with you and want to spend the rest of my life making you happy. Please don't go back to him. I know that I am the only one for you and I will always treat you right. He paused for another second and repeated his question "Jenna, will you please marry me?" My hands fell into my face after that and without even letting myself think through the answer, I let my heart do all of the talking. Looking back up at him I said "Yes!" I almost shouted the answer at him, as if saying it louder would give the word more meaning. Wanting to believe him and everything that he was saying felt like a vacation from all of the suffering and loneliness that I had endured over a lifetime of abuse and degradation but knowing what you want and getting it are two different things that rarely went hand in hand...or so I thought. All I knew from the brief period I had known this stranger was that he was offering me a life and love down an unfamiliar path and it was a gamble to believe a complete stranger but somehow I knew he was right. My heart was beating so loud I thought it was going to jump right out of my chest. With the earnestly in my reply he picked me up in his strong arms and took me back to the bed and reiterated his words in a more physical sense this time. Never had I felt loved like this before, so swept off my feet and unable to even think, eat, or do anything for that matter which would involve leaving the hotel room without him.

Everyday after school would be my Robbie waiting to take me back to the hotel room for another night's passionate rendezvous, but a few nights after his proposal, he had another surprise in store. He didn't just want to get married someday. He wanted to get married now, this week even. I walked into the fabric store and was attended too by several seamstresses who were already be expecting my arrival. I was there to design and have fun designing my own dream wedding dress. While I was busy picking out fabrics and having measurements taken I would look away for a moment only to catch his tender eyes staring in my direction. Such adoration behind his looks...could it be real? I would often ponder it to myself just hoping for the gamble I was taking to work

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out. I still had to believe in something better than what I was accustomed too and here he was right smack dab in front of me.

Giggling at all of the lace and frills they were trying to dress me up in, looking more like an antique porcelain doll than anything else I closed my eyes and pictured the day that I thought would never come, starting to imagine the kind of dress I would like to wear I envisioned a simple sleekness, a complimentary figure hugging gown with a small train but long enough to distinct it as an actual wedding dress. After we settled on what we were going to wear for the big day, we would next have to decide where we would hold the ceremony. Not before celebrating the entire week beforehand though. We started our honeymoon early celebrating every night spending our time between my hotel room and sending our heads spinning on the dance floor at many different clubs. Only with each other in sight, the dance floor was ours, we were out to give each other something to remember each night by. I whispered all of the things I couldn't wait to do him once we got back to the hotel room and watching him heat up on the dance floor I was never able to get enough of him driving me crazy. Like a thirst I was unable to quench, his lips were like a fountain of deep springs that I could never reach the bottom of.

Seven days, exactly a week after his proposal I sat on my bed in distress, contemplating what I would say to the man who I was about to call. There was no nice way to go about it. I couldn't last forever with him and this was my one chance to get out of it for good. I was leaving him, never to return to him ever again. I just had to go ahead and do it. Part of me was hoping he'd be at least a little happy for me and the sudden change in my life's direction but the other part of me knew I was already asking too much of him.

Calling his office in New York I was transferred to Jeffrey's personal office. He picked up the phone on the third ring, pausing before I could get any of the words to come out of my mouth but I mustered up my courage eventually and gave him my prepared spiel. Beginning with how much I had appreciated everything he has done for me up until this point. I hoped he would be understanding but he just wanted me to hurry up and get to the point. Trying to contagiously pass on my excitement through the phone lines, I finally screamed out "I'm getting married! Can you believe it?" No reply was given only a silence on the other end. Trying to make some conversation ridding the uncomfortable silence, I went on to tell him about Robbie and how I had fallen madly in love with him over the last amazing few days we'd spent together. The absence of sound made my thoughts begin to run wild and to get some response I had to ask him what he thought about everything I was telling him. Finally a few seconds later his reaction to the news sunk in and his only and final reply

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until many years to come was "Have a good life!" With that statement he slammed down phone receiver. Leaving only an echo of the dial tone to answer back too. I was to paralyzed from the shocking response. "What have I just done?" was the first thing that entered my thoughts.

Overwhelmed with guilt I felt like I was falling down a deep and dark hole and then the tears began to flood in. Here I was standing at the dawn of a new happy life for myself and I couldn't see past how bad I had let Jeffrey down not yet seeing the hold he had on me.

Like my knight on a white horse, in came my hero to soothe my somberness. He rushed over to the bed where I was beating myself up mentally and wiped the falling tears from my cheeks. "I take it that it didn't go so well... huh?" Sniffling through my sobs I managed to tell him that "It doesn't matter anymore all I care about is you and leaving all of that life behind me!" I wrapped my arms around him and he asked me in a half joking voice "Then why are you crying?" He got me almost laughing now too "I guess it's just so scary taking such a huge plunge away from what I'm used too and taking such a big move to another country. It's just all so different and I'm just trying to comprehend everything that is happening in such a short time." Always out to lift my spirits his next comments made me gush in laughter "You think that was a hard phone call wait until I call my Sicilian mother! Watch this, I know exactly what she'll say. First it'll be a saga about how I'm killing her with my selfish actions then it'll be about how she's going to kill herself for doing such a terrible job raising normal children. Don't worry though, she'll love every second of it. Wogs thrive off of the drama in their lives and off everybody else's for that matter!!!" He was pretty much on the dot when he told me how she'd react to the news. In the end after relentlessly trying to change his mind, she sighed, "If it was going to be anybody to do something as crazy as this, Robbie, it would be you!" It wasn't a blessing as such but at least she wasn't threatening suicide any longer.

Calling the closest of our families the night before our wedding to share with them our announcement wasn't celebrated by any members of either sides but that didn't discern us one bit. My parents took it well, considering their only daughter was marrying a foreign man that they didn't know from the next guy on the street and too top it off I was moving to Australia, permanently. When I asked my Dad many years later why they hadn't put up a fight, he just simply replied that nobody expected it too last very long. Fair enough, I thought. I don't think anyone did at first... even us at our toughest times. We were a rare attribute these days in the numb era we have all been accustomed to living in, turning nothing into something, which I had also come to realize, was the most precious gift in life....Love.

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Falling asleep was easy to do in his arms that night. I laid my head on top of his chest listening to the drum of his beating heart. I had never felt like I was more at home than ever before in my life. He pulled me gently in closer to him, letting me know that he was there for me even when the lights went out and the thoughts would usually creep in. Amazing how he knew what I needed without even asking for it. Wishing for something like this my whole life I thought I was being such a fool in so many ways, but I was so wrong. The way his pretty eyes looked at me with such an understanding and compassionate sincerity made me want to trust his words and believe the love that he was offering me was indeed real.

The next morning, Robbie was up and out of bed early to pick up our tailored wedding suits and dresses for our big day at Doi Cept Temple. His best friend from high school days that was travelling with him from Australia met him in the hotel lobby at seven o'clock. He was going to be joining us for the wedding as Robbie's best man. He still hadn't been able to find black shoes to go with the suit, so after he dropped off my dress back to me he was off again to try and find himself a pair of decent looking ones. Overjoyed with excitement I was thrilled from the second I kissed Robbie good-bye for the last time before we were officially married. Looking in the same mirror only a week ago I was now a different person, I felt like I was plunging into a bottomless abyss. Here I go, I thought to myself as I plunged out the door letting the butterflies in my stomach carry me all the way to my nearly husband.

I had to go to the beauticians that morning for my pre-wedding makeup and dressing. The ladies who were doing my hair and face at the salon did a great job making me feel so beautiful for my special occasion that every girl dreams about their whole entire life. Requesting simplicity at best, not wanting to go overboard with all of the wedding apparel they tied my long hair up into a knot wrapping around it a veil of flowers made up of baby's breath and small yellow and purple budding flowers. I couldn't have dreamt it up better myself and when I met my husband to be at the bottom of the mountain he stood before me speechless "You look so... beautiful!" were his first words that his mouth formed almost whispering them. He took my hand and we walked into the sky lift together. Behind us followed an interpreter that Robbie hired to translate the Buddhist monks ceremony speech for us English only speakers and then his best friend, who only moments before gave him the best mans speech about being the last chance to walk away from this and not get married to a girl he hardly knew, but my Robbie wouldn't hear a word of it. He already made up his mind the instant he proposed and I said yes, "I was born to be with this girl," he told his best mate. "Alright then lets go do this then!" Once he knew Robbie was sure in his decision he was more than ecstatic for him. We were slowly lifted up the tremendous mountainside,

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surrounded by the floral green carpet of mossy grass that covered the earthy skyscraper and falling fog, it was like being carried to heaven or the closest thing to it! Taking my eyes off the scenery and catching him adoringly staring at me again, I welled up with unstoppable tears. "I am so lucky, is this really happening?" He squeezed my hands and replied back "You're the only one for me... I love you!" relieving the anxiety written all over my tear stained face.

Chapter 22

Getting out of the carriage we were greeted by good fortune from the Gods above. A sun shower cascaded over us at we advanced into the ancient holy temple. My tears of joy dried and my happiness was glowing for all to see. The many visitors to the temple stopped and took photos of the passing bride and groom, no other foreigners had ever been married there and certainly anyone wearing traditional western wedding attire, such a sight had never been seen behind these religious walls, we became a permanent icon at the temple. The ceremony was done in the Buddhist customs according to their ancestral accordence, and translated for us in our own language. Both Robbie and I were anointed with a blessing from the monk with a splash of water and seven sacramental bracelets, each one representing another meaning to the longevity of our union together. We signed our names in the Buddhist wedding registry of Doi Cept Temple and officially became Mr. & Mrs. Roberts at least officially in our hearts knowing the laws of Australia only recognize certified weddings, meaning when we got back to his homeland we'd have to make a run for the courthouse. This was our real wedding though, perfect down to every detail. Walking up to the highest point of the temple to the balcony hanging over the edge of a cliff side over looking the city of Chang-Mai, we knew we had found the perfect spot to recite our vows of love to each other. Providing everything for me and more than I could ever ask for, his vows were to love me unconditionally until death do we part, shelter me from all the cruelty in the world that I was so accustomed too and to be like the bear, because the bear never forgets. Tears once again streamed down from my eyes as he made this moment unforgettable. Wiping the mascara fading underneath my eyelids whilst giggling at my embarrassment I took his hands back into mine again and gave him the vows that were the sacred prepared words from my heart. My ears were thundering the sound of a million horses hoofs descending downhill and my heart was beating so fast my words barely trembled out of my mouth when I began to tell him how much he had changed my

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whole life around and how I would dedicate my entire being to loving him and only him until I blew my final breath.

I meant every word that I said to him, this was it for me, wanting nothing more out of life than to be with someone like him to raise a few kids together and grow old on the front porch letting the days fade us by. I know it probably sounds boring to most and it would've to me as well many years ago but after the life I had led, I had enough experience in the real world for my liking and now all I want to do is to enjoy the remaining days of my life for what it is...a simple and satisfying existence. Our day was so special but not only to us, even too the Monk that married us. Upon our descent down the lifts he asked if he could take a photo with the bride and groom in front of their symbolic liberty bell signifying the union between east and west. It represented a lot for us too, it was the commencement of a new life together and just the beginning of battling each other's past demons together.

Kissing the bridal party goodbye, who were just the local girls I had met on some of our many nights out of having fun. I threw my arranged bouquet of Thailand's white wedding florals mixed with colorful orchids to the screaming Thai women behind me and we were given one last tradition to take with us, the release of caged doves. It was such an incredible gesture, especially for me. Symbolizing their freedom as well as mine I opened the cage's door to let them free to decide our own fates. As the wings on the birds began to spread open and they took their final decent into the blue skies granting themselves freedom I knew mine had finally come too. The relevance of watching them fly away and how I had perceived my own day of marriage related to the identical feeling of fleeing an entrapment of my own kind. I was liberated from the bounds of slavery I had come to know over the many years I had spent with my fair share of greedy perverted old men only to have serendipity mend my scars with the powerful healing of what true love has to endeavor on.

As customary in the romance novels I had read as a young girl he picked me up in the hallway before our hotel suite and carried me over the threshold, poufy dress and all. My arms were tightly squeezed around his neck never once taking my eyes off of him until he revealed yet another sweet surprise. Besides the cleaners tidying up my room while we were gone they were also given instructions by none other than the groom himself to pick the petals off the stems of red roses to place on our bed in the shape of a giant heart. The rose petals led the way to where we consummated our love physically and it was undeniably the first time in my life I had really ever been made love too. Hours had passed by before we thought about anything else besides one another's words of arousal, tantalizing touches, and lingering kisses. We ate a quiet dinner at a local restaurant and went straight back to the arms of each other again, so

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profoundly in love with one another it was the ideal display of what the "honeymoon period" should have to show for. It was crazy, young and energetic, just what it should be between two blossoming lovers.

The following morning we left the Princess Hotel, no longer under any of Jeffrey's financial privileges or control so to speak, continuing our love spree in another dwelling of our own accord. Three days later when we finally showed our face for the first time since checking in downstairs in the new hotel lobby, besides to request fresh sheets and towels, the entire staff of the hotel had a good laugh at our expenditure, from their reaction it must've been nice to see a couple so affectionately fond of each other.

Now we wanted to have another type of fun, Robbie had visited a tourist agent by himself before we got hitched to book a honeymoon itinerary for us to explore Thailand and beyond together, another surprise he had in store for me. We left early in the morning and joined the crowded bus for our journey beyond the border of Thailand to a village in the war torn nation of Laos. When we got through the extremely armored visa office eight hours off the beaten path, we then had to cross a flooding river from a recent heavy downpour of rain in a slim banana boat that looked like it could barely handle our weight let alone the excess of my luggage that Robbie was so kind to trek around the world for me.

Unbelievably we did make it to the other side only to find that my honeymoon in the tropics wasn't exactly how it had been explained to me. Naked children ran through the dirty streets, with one boy that decided to release his bladder on the pathway where we were walking as we passed by him on the way to our hotel. My doubts of his choice in destinations became apparent after that sight. Robbie was getting hungry after we hadn't eaten the entire duration of the trip and being such a rugged man he could digest just about anything. Deciding to stop on the side of the road he ordered some kind of seafood dish...daring I thought, settling for some toast and jam, something safer I thought. Then I saw the lady behind the counter dip some plates in a dirty bucket full of dirty water and then rinse in another bucket of water that didn't look as bad as the previous mud drenched one and then further proceeded to put my toast and his food on top of them serving it to us all in a clear view. I just couldn't bring myself to even fathom it "I can't eat that!" I mouthed in a hushed voice trying to quietly make my point clear but was made public with his loud mouth outburst of "Why not? Looks fine to me. You have to try and eat something, you haven't eaten all day!" I know it was just his caring side that was trying to force me and to top it off he is Sicilian and they're all about eating so it was our first debate and now we were officially married with many more marital conflicts to subsequently follow. Two head strong and stubborn people both with the right

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intentions but still recovering from old wounds. It was only natural and important that we fought just as much as we made passionate love together. Countlessly proving to one another the true intentions of each other loves but sometimes in not so seemingly actions.

Finally arriving at the hotel it was like a scene out of a horror flick. We were showed up to the room that looked like someone had been brutally killed in. The bed sheets were torn apart and the bed was stained with blood from some poor helpless victim. Nearly vomiting at the pure sight of the room and the stench that accompanied it, I was now tearing at the thought of even staying here for a single moment longer. "No way!" I told my new husband and from the tone in my voice he knew I was serious. Not that I was not denying the fact I have never been an outback type of girl. I was fine with that impression, I am no snob but give me the simple luxuries of a clean bed and a shower then I'll make myself at home, but this was just the epitome of filth and even possibly an act of a horrendous event but who knows, the lady who showed us to the room seemed fine with it passing it off as a hooker on her period. In some ways that was even worse... "Yuk... Okay Robbie it's time to go...now!" we were heading back down hill back to the passport center declaring our passage back into Thailand. Considering us a risk due to the short time we spent crossing the border and back, the officials held us at gunpoint while others rummaged through our luggage for drugs or whatnot. Finding nothing of course they released us and stamped our passports, making us good for another three months if we wanted. We were thankful for escaping with our lives alone, although we had nothing to hide but still an endearing experience nonetheless in the first days of our honeymoon of all days.

Chapter 23

Arriving in Koh Samui for finally a bit of relaxation in the tropics, it was my idea of how a holiday should be, sunny warm, and clean... well, clean enough. We lived it up like kings for the next six weeks. Making it an ideal way for two strangers to properly get acquainted. Dancing into the wee hours of the night and making love in the blistering heat of the sunny days we discovered everything on that island... mostly being each other. We made friends of all sorts, mostly travelers, but everyone the same in being taken aback by our fairytale romance. With our captivated eyes never straying too far from one another anyone could easily see the strong chemistry between us.

Trying to find the woman in me wasn't difficult, as I took to the bounds of marriage with such ease, no longer a girl I loved the idea of being a

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wife and belonging to a husband like Robbie. Marriage was bliss for the duration of our honeymoon until we had to ride coach on our way to Bangkok Airport to fly out to Australia. Chatting away with always so much to say to each other we watched a movie and finally got comfortable leaning up against each other as pillows. We both fell asleep on the long ride and when we woke up to the sound of the buses brakes coming to a halt we initially realized my purse and Robbie's wallet with all of our money and cards in it was missing. Stranded in the city of Bangkok was frightening enough as it was but too make matters worse a lady looking in her mid-seventies, scrawny and hunched over from an obvious lack of nutrition lifted up her skirt to a passer-byer with a she-male hanging off his arm and began smacking her vagina blaring out "Look! No cock...Pussy, pussy! Only five baht" repeating herself many times over the man just walked on past as she sat back down on the curb waiting for the next alluring customer. Robbie and I shook our heads in disgust and disbelief, things could really be that bad for someone, I would know best as it wasn't far off the life Jeffrey had been training me up for.

Completely broke at two o'clock in the morning and with no one to call for help, I panicked right away. Robbie rubbed my back and his tired eyes trying to make the situation better. Luckily we had made friends with some really nice people from the resort on the island who gave us about two thousand baht when they saw how devastated Robbie and I were. With just enough money to rent a really cheap room for the night at a backpackers hostel and pay for a taxi to the airport the following day, we were saved.

Early the next morning we were off in separate planes, since Robbie's ticket was pre-booked and no available seats left for me to join him meant we would be landing in Australia separately. Fortunately we had found a corresponding flight that arrived within the same hour of each other but I would have to make a stop over to the Philippines. The lengthy hours of the duration on the flight seemed to stretch on with only the thoughts of the journey ahead of me I couldn't wait to get back to my husbands loving arms. The trip was going well, sleeping the majority of the flight until I had to change planes in the Philippines.

After the plane landed and before any passenger was allowed to get off we were handed a declaration statement that informed us that if we were carrying any drugs or weaponry, we would be arrested and face charges with death as the ultimate penalty. Not that I had anything to worry about, but what a thought to willingly sign over your life. I got the chills handing over my signed declaration and traveling documents to the customs officer. Obtaining my passport he additionally asked to see my departing ticket. No problem I thought, just I had done many of times, and I handed over the requested information. The officer looked me over

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and got on the phone immediately which sounded like a phone call to his superiors but I couldn't tell since it was in another language. A brief conversation but long enough to get me thinking, he then called over two guards who took me by the arms and brought me into an empty room but for a desk and three chairs to be interrogated. No one would tell me what was going on they all just scattered around in frenzy, ignoring all of my hysterical inquisitions. Leaving me by myself and alone with my thoughts I couldn't help but panic even worse now.

This was a total bombshell of confusion on my part, what had I done wrong? Minute's later a large-framed woman in a green uniform entered the room with the guards from before and sat down across from me with a stern look in her eyes. She placed my documents on the desk in between us. Not saying a word to me she was waiting for me to give her an explanation for something. "Can you please tell me what this is about, have I done something wrong?" I asked her politely, trying to restrain any animosity towards her. Her reply sounded as grim as she looked. "You have been in Thailand for three months and now you have only a one way ticket booked to Australia with no visa. What exactly are your plans once you get there, Ms. Roberts?" To myself I wondered what business it was to her, don't people travel with one-way tickets all the time? Knowing I was in no position to be able to say anything like that or even at all I just gave in nicely and told her my intentions to travel over there. Crying through my entire explanation I wasn't sure if I was going to even make my flight now. She had to think about everything I had told her for a moment, deciding whether or not she would grant me

permission to meet my husband in Australia or send me back alone to Bangkok. With only time on my side she had to make a hasty verdict now. One more question had to be answered before I was let go, she wanted some proof. "If you have just got married can you show me your marriage certificate then?" This didn't help my stories credibility at all seeing that we were married in a Buddhist temple and given woven bracelets instead of certificates. Explaining to her that I didn't have one to show her yet but was already aware that I would have to obtain a legal marriage certificate through a courthouse upon my arrival in Australia to stay there legally, it was only because of my husbands beliefs we wanted to get married in a Buddhist ceremony. She must have shared a common interest in religion or something like that as she finally cracked a smile upon the photos of the wedding day that I showed her and carrying in my purse since getting them developed, if she wanted proof, well this is all I really had.

Handing me back my documents and ticket I was now free to leave but she wasn't leaving me much time to run through the airports terminal to get to my departing plane. Expeditiously bolting through the busy airport

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my adrenaline was still pumping from the previous encounter with the officials of the Philippines who had enough power to condemn me if they had felt like it. I caught my plane in the knick of time and once I was settled in my seat my thoughts went back to my dear Robbie and how much I was missing him. I was just relieved that I was on my way to be back with him again soon.

Looking out the window I could see the red earth beneath me. As I landed for the last time I took notice of the first steps I walked off the plane and onto a new soil for the first time. I had so much to be looking forward too in my new homeland. In my heart I knew this was all I ever wanted, this was going to be my haven. There was another surprise in store for me when two elder strangers walked up to me and asked my name. "Are you Jenna?" Nodding at their question they gave me their first names and wrapped their arms around my neck. My new mother-in-law then said, "We are Robbie's parents. We wanted to be the first ones who welcomed you to Australia and into our family." It was my in-laws meeting me for the first time. Handing me some balloons and flowers they even had gifts for their new daughter-in-law. While waiting for Robbie's plane to arrive we all chatted about many things like the flight over from Thailand and the scare at the previous airport in the Philippines. I asked them how they knew whom to look for? My father in-law laughed, saying recognizing me was easy from Robbie's detailed description. He told them to look out for a petite, young blonde carrying an abundance of luggage. Laughing together over a few more brief conversations of getting to know each other better they seemed relieved to finally meet me compared how stressed she sounded in the conversations I overheard Robbie having with her while in Thailand.

Watching the arrivals board I knew Robbie's plane had landed ages ago but was just waiting for him to get out of customs. It didn't bother me anyhow, I was enjoying get accompanied with his parents for the first time. Eventually I saw my husband walking down the runway behind the gates, I just couldn't wait a second longer. I ducked underneath the gates and ran all the way up the runway to jump excitedly into his arms. I wrapped my arms and legs around him holding onto him for dear life. I just missed him so much I knew I would never let him go, theoretically speaking that is, and I never have nearly a decade later.

Chapter 24

Over the near decade we spent together, Robbie and I have shared the common highs and lows that every determined marriage endures. It has

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taken a lot of hard work and doesn't come without its flaws but no matter what it is just perfect for the two of us. He helped me how to remember to smile again and life has slowly began to sort itself out. They say that time heals all wounds but what I had experienced in my young years wasn't nearly long enough to let all of the hurt go. Seeking help through many counselors and psychiatrists I was doing everything I could do to deal with the scars and all of the pain left behind. Completely off of any pharmaceuticals, since the last day of our honeymoon, and healing my heart with love instead of hate our marriage is my foundation and Robbie is my solid rock. We have to be for one another, putting the bonds of our union through the wringers and back, as neither of us expected my past life eventually to come back and haunt me after so long.

Our blissful life came to a sudden halt one day when we were out visiting my in-laws at their nearby house on just another plain afternoon. There was a knock on the front door and my father in-law got up from watching TV on the couch to answer it. He rushed back quickly coming into the dining room, where I was feeding my nineteen months and five month old boys at the table, and he blurted out, "Jenna there are three police officer's at the door asking for you by the name of Virginia Roberts!" I asked my mother in-law to stay with the babies to find out what this was all about. I didn't even think it had anything to do with Jeffrey at first and wasn't even worried when I opened the door to offer them to come inside to talk.

They weren't actually police officers and two federal agents of Australia with one F.B.I agent from America. The American agent asked if I wouldn't mind actually coming outside so that I may speak with them in private. "Okay" I said, as well as mentally preparing myself for something big from the look of it, it's not over a parking ticket or anything small that you get three federal agents knocking at your in-laws front door asking to speak in private. "Can we first ask you if you are in fact Ms. Virginia Roberts and originally from Palm Beach County in the United States?" I confirmed my name and previous state of residence then they even asked, "May we see some identification please?" A different agent asked the question this time and I told him "I will have to go and grab it, my purse is inside. I'll just be one second."

Robbie was standing on the other side of the door trying to figure out what they were doing here talking to me and when I rushed through it to grab my purse and saw him standing there looking puzzled, I told him I had no idea what this was about yet, but not too worry everything was going too be just fine. Taking a deep breath and slowly exhaling outwards, I opened the door to find out exactly what the agents wanted to talk about.

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Pulling out my Australian drivers license from my wallet, I was going to hand it over to them but they were sufficed at a quick glance. There was no meet and greet, they went straight to the point. One agent picked up a briefcase off the porch floor and opened it up taking out a stapled stack of paper. Then that same agent asked me if I had ever known an affiliate by the name of Mr. Jeffrey Epstein. All of the sudden my stomach tangled in a familiar knot that I hadn't felt in many years from a past life that I was trying to forget about. I nodded in affirmation of their question and said "It was a long time ago and he's no longer an affiliate of mine, but yes, I did know him once." It was shameful enough to think about let alone talk about with them for the first time since I had started my entire life over. His next response left me nothing short of speechless. The United States Attorney's Office for the district of Florida was giving me a notification of being an identified victim. Jeffrey was finally caught for his atrocious acts of perversion on girls who were barely old enough to even comprehend "the birds and the bees" so to speak.

On June 30th 2008, Jeffrey Epstein pleaded guilty for procurement of minors to engage in and solicitation of prostitution. More than a dozen girls had been named as victims of Jeffrey's federal offense's and without ever stepping a day in court he was granted a plea bargain consenting to charges that named him a registered pedophile for only two of the minor girls. Getting away with even serving only twelve of the sentenced eighteen months behind bars be that in the evening alone and in the morning he was released during the day. Restricted to the confinement of his lavish mansion in Palm Beach only to be with his original sex slaves from over ten years ago, Nadia Marcinkova and Sarah Kellen, and knowing Jeffrey all too well, they wouldn't be the only ones there while he was pulling his laughing stint of retribution. Even at nighttime the girls were still allowed to visit him, accounting to nearly seventy times while serving his time in incarceration.

No justice had been served for any of us victims. Denied the very constitutional rights allegedly there to protect and serve us. We weren't allowed to have a voice in front of a jury and judge or even informed for that matter. Instead we were handed this notification of being a victim but told we were all too late to do anything about. To make matters worse part of that plea bargain was that we had the option to sue him with the lawyers he provided for us, and conveniently enough I found out later they were also his lawyer's old friends from the college days.

I felt my knees go weak and the anxiety churning in my stomach was now making me feel sick. Taking the bundle of paperwork from the agent who was now handing it to over me, I had to excuse myself before my legs actually buckled. Closing the door behind me I couldn't even find the words to tell my husband what was going on. I rushed to the back of

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the house and went out to the back yard where I wanted a minute to compose myself and process the information I had just been told. Robbie followed behind me but the stillness in my eyes convinced him to give me that moment to compile my emotions.

A few moments later and I was ready to talk. Collapsing into his arms with such anguish, he just held me until my sobs subsided and I was able to tell him what actually happened. Starting with an apology, I began to tell him how I was so sorry but my troubled past has come back to plague our simply sweet lives and was just about to turn it all upside down. He was so understanding from the beginning of all this, telling me that he will always be behind every choice that I make in mending the sorrows of my tormenting past and there he has been through all of the thick and thins.

Deciding to call the lawyers on the victim suit provided for me was a big decision but one I had to do to seek the unanswered questions from my battered heart. The two women at the firm that I spoke to treated me so wonderfully, like long term friends they counseled me not only in the terms of a lawsuit towards Jeffrey but also in the matters of being emotionally and sexually abused. I chose to proceed with the lawsuit at least to make a statement to a man that tried to make a degrading statement about me so long ago. Now it was my turn, I had the choice to turn the tables on him hoping he would feel embarrassed and in the spotlight for everyone's entertainment where he had kept me for so many years.

Winning my lawsuit against him was not enough to heal old wounds, I never got the chance to stand up in front of a jury and tell them how much pain I had endured and still endure throughout the many nightmares I face when darkness hits and the silence of the sleeping household fills my head with pictures of reliving my past with him or the others he sent me too. Or did I even get to hear him confess his guilt and suffer the way I did locked in confinement for many years? No, instead I got to see a picture of Jeffrey with his arms around a very youthful looking teenager, if even that, parading the streets of New York, the very way he had with me and so many other girls long before.

As if it were a public display intended for not only his many victims to see but also a spectacle for the public justice system, it was bold show of insolence laughing in our faces while we all sat by not being able to do anything to help these young girls from the streets still suffering his perverted afflictions. Not much longer there was another story on Jeffrey I saw in the papers of him and Prince Andrew having a stroll together in Central Park. It instantly sparked my concerns for other girls in the very same position I was in so long ago and he was obviously up to the same old tricks, I had to do something now. Not being able to sit by any longer

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with the knowledge of being able to help out in some way. I had to tell my story no matter how shameful it was to even speak about. Putting my shame aside I had to derive every bit of courage I could sustain and now I am ready to tell it. The hardest lesson I had failed at learning until later on in my life became my strength, the belief in my inner voice and the ability to speak up. I do have a voice and now the world is going to hear it in my whispered cries for justice. Swept away by a surge of media with one phone call I sent Jeffrey's publicist into frenzy. Not to mention the release of the photos showing the first night that Prince Andrew and I shared together that I so happened to unveil for the public to see.

I spent too much of my life going out of my mind waiting for the rescue that never came until it was too late and then the scars were already imbedded deeply within. Thankfully I am now free from the struggles that nearly destroyed the love inside of my heart. I only wish it could be the same for the other victims, not just of Jeffrey's infictions but every person who has ever suffered at the hands of another.

I'm here to tell you from my own experience that the moon is yours if that's what you want, all you have to do is stand up and take it. If some girl off the streets of Florida, like me, can stand up against the tyrants that run the deep pockets of our world, than anyone can. Just like I needed to believe that someone stood up for me once like Robbie did long ago, I now stand up for us. For all of us girls, the ones who are still on the streets and think they don't deserve better or it's an unachievable dream to be entitled to more out of life. For all of the beautiful girls who don't see beyond they're outside appearance. For all the girls still trapped in enslavement and unable to get out of the abuse that holds them down. But most of all, I stand up for every girls belief in love, because it is the very savior of my spirit and soul.

The End

Written and Illustrated by Virginia Roberts

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EXHIBIT LL

ARTICLES OF INCORPORATION

In compliance with Chapter 617, F.S., (Not for Profit)

ARTICLE I NAMEThe name of the corporation shall be: Victims Refuse Silence, Inc.**ARTICLE II PRINCIPAL OFFICE**Principal street address:425 North Andrews Ave.Suite 2Fort Lauderdale, FL 33301

Mailing address, if different is:

ARTICLE III PURPOSE

The purpose for which the corporation is organized is: Victims Refuse Silence, Inc. is organized exclusively for charitable and educational purposes including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code. The corporation is organized to provide assistance to victims of sexual abuse as well as victims of human trafficking. Upon the dissolution of Victims Refuse Silence, Inc., assets shall be distributed for one or more exempt purpose within the meaning of section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose.

ARTICLE IV MANNER OF ELECTION

The manner in which the directors are elected and appointed: The manner in which the directors are elected or appointed is provided in the bylaws of the Corporation.

ARTICLE V INITIAL OFFICERS AND/OR DIRECTORSName and Title: Virginia Roberts, DirectorAddress: 425 North Andrews Ave.Suite 2Fort Lauderdale, FL 33301Name and Title: Bradley J. Edwards, DirectorAddress: 425 North Andrews Ave.Suite 2Fort Lauderdale, FL 33301Name and Title: Brittany N. Henderson, DirectorAddress: 425 North Andrews Ave.Suite 2Fort Lauderdale, FL 33301

14 DEC 23 PM 12:25
 FILED
 2019
 14 DEC 23 PM 12:25
 FILED

Name and Title: _____ Name and Title: _____
Address: _____ Address: _____

Name and Title: _____ Name and Title: _____
Address: _____ Address: _____

ARTICLE VI REGISTERED AGENT

The name and Florida street address (P.O. Box NOT acceptable) of the registered agent is:

Name: Bradley J. Edwards
Address: 425 North Andrews Ave., Suite 2
Fort Lauderdale, FL 33301


FILED
14 DEC 23 PM 12:25
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

ARTICLE VII INCORPORATOR

The name and address of the Incorporator is:

Name: Brittany N. Henderson
Address: 425 North Andrews Ave., Suite 2
Fort Lauderdale, FL 33301

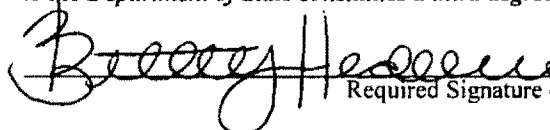
Having been named as registered agent to accept service of process for the above stated corporation at the place designated in this certificate, I am familiar with and accept the appointment as registered agent and agree to act in this capacity



Required Signature of Registered Agent

12-17-14
Date

I submit this document and affirm that the facts stated herein are true. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.



Required Signature of Incorporator

12/17/14
Date

2015 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL
REPORT

DOCUMENT# N14000011657

Entity Name: VICTIMS REFUSE SILENCE, INC.**Current Principal Place of Business:**425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301**Current Mailing Address:**425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301**FEI Number: 47-2627774****Certificate of Status Desired: Yes****Name and Address of Current Registered Agent:**EDWARDS, BRADLEY J
425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.***SIGNATURE:**

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title	PRESIDENT, DIRECTOR
Name	GIUFFRE, VIRGINIA L
Address	425 NORTH ANDREWS AVE., SUITE 2

City-State-Zip: FORT LAUDERDALE FL 33301

Title	VP, DIRECTOR
Name	GARVIN, MARGARET A
Address	425 NORTH ANDREWS AVE., SUITE 2

City-State-Zip: FORT LAUDERDALE FL 33301

Title	SECRETARY, DIRECTOR
Name	HENDERSON, BRITTANY N
Address	425 NORTH ANDREWS AVE., SUITE 2

City-State-Zip: FORT LAUDERDALE FL 33301

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: BRITTANY N HENDERSON**DIRECTOR****04/22/2015**

Electronic Signature of Signing Officer/Director Detail

Date

EXHIBIT MM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO: 15-cv-07433-RWS

VIRGINIA L. GIUFFRE,
Plaintiff.

-vs-

GHISLAINE MAXWELL,
Defendant.

_____/

425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Thursday, September 8, 2016
8:53 a.m. - 10:30 a.m.

VIDEOTAPED DEPOSITION OF BRITTANY HENDERSON

Taken before Rinat Katz, Reporter, a Notary
Public for the State of Florida at Large, pursuant
to Notice of Taking Deposition filed in the above-
styled cause.

1 APPEARANCES:

2 On Behalf of the Plaintiff:

3 BOEIS, SCHILLER & FLEXNER, P.A.

401 East Las Olas Boulevard, Suite 1200

4 Fort Lauderdale, Florida 33301

Smccawley@bsfllp.com

5 BY: SIGRID MCCAWLEY, ESQUIRE

6 On Behalf of the Plaintiff and Victims Refuse
Silence, Inc.:

7

FARMER JAFFE WEISSING EDWARDS FISTO LEHRMAN

8 425 North Andrews Avenue, Suite 2

Fort Lauderdale, Florida 33301

9 (954) 524-2820

Brad@pathtojustice.com

10 BY: BRADLEY J. EDWARDS, ESQUIRE

11 On Behalf of the Defendant:

12 HADDON, MORGAN & FOREMAN

150 East 10th Avenue

13 Denver, Colorado 80203

(303) 831-7364

14 Jpagliuca@hmflaw.com

BY: JEFFREY PAGLIUCA, ESQUIRE

15

Also Present:

16

Ryan Kick, Videographer

17

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(Exhibits Retained by the Court Reporter)

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1 she has continued to try and promote Victims Refuse
2 Silence at every possible chance she gets with -- the
3 story she told me was that someone had come to her
4 door, knocked on the door, selling something or talking
5 about something totally different, and she explained
6 what our mission was and tried to get them to, then, go
7 and spread the word for victims of human trafficking,
8 as well.

9 Q And this would be in Australia this
10 conversation occurred?

11 A Correct.

12 Q Okay. To your knowledge, is VRS incorporated
13 in any fashion in the country of Australia?

14 A It is not.

15 Q To your knowledge, does VRS have any website
16 presence in Australia?

17 A I believe that the internet works everywhere,
18 so I would say yes, because, if you Google Victims
19 Refuse Silence, we do have a website. So I would
20 imagine that that's something that would come up in
21 Australia.

22 Q Okay. Other than the somebody knocking at
23 her door, that conversation, did she report to you
24 anything else that she has done on behalf of Victims
25 Refuse Silence in the last year, let's say?

1 MR. EDWARDS: Objection --

2 THE WITNESS: During this telephone
3 conversation --

4 BY MR. PAGLIUCA:

5 Q Yes.

6 A -- or in general?

7 Q During this telephone conversation?

8 A She did explain that, when she goes to her
9 kids' schools and when she is out, she tries to promote
10 the organization, as well, and just talk to people, and
11 general awareness and understanding to raise -- for
12 issues of human trafficking, yes.

13 Q And did she report anything else to you
14 during this phone conversation?

15 A During this particular conversation?

16 Q Yes.

17 A No.

18 Q Okay. Then, you indicated that you reviewed
19 your file for all the paperwork, and we'll talk about
20 the documents produced in this case in a moment.

21 Can you tell me, other than what has been
22 produced as part of the response to subpoena issued to
23 VRS, what other documents are in the file that you
24 reviewed?

25 A I have saved every piece of mail that has

1 "publication," would be the Facebook page; correct?

2 A In addition to the website, yes.

3 Q Okay. Number 11, documents relating to all
4 appearances. As I understand it, there are no
5 documents that exist that comply with this request;
6 correct?

7 A Correct; to my knowledge.

8 Q Do you know, has anybody on behalf of VRS
9 made a public appearance on behalf of VRS?

10 A I believe that there was a scheduled
11 appearance, yes, one.

12 Q And when was that?

13 A I honestly don't know when that took place.
14 I would imagine in the beginning of 2015.

15 Q And do you know who was scheduled to appear
16 in the beginning of 2015?

17 A Ms. Giuffre.

18 Q And do you know where she was scheduled to
19 appear?

20 A I believe in New York with ABC.

21 Q And that would have also been with Mr.
22 Edwards and Ms. McCawley; is that correct?

23 A I believe so, yes.

24 Q And in fact, she did go to ABC and give a
25 taped interview, correct?

1 MS. MCCAWLEY: Objection.

2 THE WITNESS: It's my understanding, yes.

3 BY MR. PAGLIUCA:

4 Q Okay. Is it your understanding that that was
5 on behalf of VRS?

6 A I do not believe her appearance there was
7 made on behalf of VRS, but I do believe that -- I know
8 that she wanted to promote the charity, so that we
9 could start helping people and that she could start
10 getting her mission out to the public.

11 Q Okay. Number 12, all contacts received by
12 VRS through its website, or otherwise, to schedule -- I
13 think it should say "an event," and "and event."

14 There are none of those, as I understand it?

15 A No, that is not correct. We produced a --
16 yes, we did produce something to you. I'm not sure
17 what the Bates Stamp number is, but it was a contact
18 received by another victim of sexual assault who had
19 reached out to the organization.

20 Q An email, I think it's in December of 2015,
21 maybe; is that what you're referring to?

22 A I believe -- I'm not sure of the date. I
23 guess.

24 Q We'll look at it. And that would be the only
25 contact received by VRS; is that correct?

1 C E R T I F I C A T E O F O A T H

2

3 STATE OF FLORIDA

4 COUNTY OF BROWARD

5

6

7 I, Rinat Katz, Reporter, Notary Public, State
8 of Florida, certify that BRITTANY HENDERSON
9 personally appeared before me on the 8th day of
10 September, 2016, and was duly sworn.

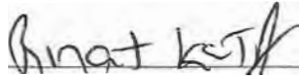
11

12 Signed this 22nd day of September, 2016.

13

14

15



Rinat Katz, Reporter

16

Notary Public, State of Florida

Commission No.: FF4576

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Commission Expires: 04-03-2017

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1 CERTIFICATE OF REPORTER

2

3 STATE OF FLORIDA

4 COUNTY OF BROWARD

5

6 I, Rinat Katz, Reporter, certify that I was
7 authorized to and did report the deposition of
8 BRITTANY HENDERSON, that a review of the
9 transcript was requested; and that the transcript
10 is a true and correct record of my stenographic
11 notes.

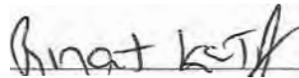
12 I further certify that I am not a relative,
13 employee, attorney, or counsel of any of the
14 parties, nor am I a relative or employee of any of
15 the parties' attorneys or counsel connected with
16 the action, nor am I financially interested in the
17 action.

18 Dated this 22nd day of September, 2016.

19

20

21



Rinat Katz, Reporter

22

23

24

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Reply Brief in Support of Defendant's
Motion for Summary Judgment**

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PRELIMINARY STATEMENT

Before the Court reaches the question whether plaintiff can prove falsity and actual malice, it should decide three questions of law, one that narrows considerably the legal issues and two that dispose of the case entirely.

1. It is undisputed Ms. Maxwell, through her agents, sent to various media-representatives—and to no one else—the January 2015 statement. It is undisputed she had no control over any of the media that decided to republish excerpts from the statement. On these facts, under black letter New York law, she is not responsible for these republications. Plaintiff’s contrary argument relies on a “foreseeability” doctrine the New York Court of Appeals has specifically rejected. Summary judgment should enter in favor of Ms. Maxwell as to any republication.

2. Under the New York Constitution, whether a statement is constitutionally nonactionable opinion depends upon, among other things, an examination of the full context of the communication and consideration of the setting surrounding it. The January 2015 statement, making no reference to specific allegations, explains *why* the author believes plaintiff’s allegations are “obvious lies”: “Each time the story is re told [sic] it changes with new salacious details” It is an expression of a venerable opinion: when a person falsely cries wolf previously, others are free to opine she is telling falsehoods now. This is nonactionable opinion.

3. Under New York law, a statement made pertinent to good faith anticipated litigation is nonactionable. The statement was sent exclusively to the media representatives, and contained a clear message: the media should not republish plaintiff’s “obvious lies,” else Ms. Maxwell would sue them. Such a statement is nonactionable.

If the Court reaches the question of falsity and actual malice, the Rule 56 record establishes plaintiff cannot prove falsity and actual malice by clear and convincing evidence.

ARGUMENT

I. Ms. Maxwell is not liable for republications of the January 2015 statement.

Under black letter New York law, liability for republication of an allegedly defamatory statement “must be based on real authority to influence the final product.” *Davis v. Costa-Gavras*, 580 F. Supp. 1082, 1096 (S.D.N.Y. 1984). “[W]here a defendant ‘had no actual part in composing or publishing,’ he cannot be held liable.” *Id.* (citing *Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906)); accord *Geraci v. Probst*, 938 N.E.2d 917, 921 (N.Y. 2010). “[C]onclusive evidence of lack of actual authority [is] sufficiently dispositive that the [trial court] ‘ha[s] no option but to dismiss the case’” *Id.* (emphasis supplied; quoting *Rinaldi v. Viking Penguin, Inc.*, 420 N.E.2d 377, 382 (N.Y. 1981)).

It is undisputed Ms. Maxwell and her agents had no ability to control and did not control whether or how the media-recipients would use the statement. DOC. 542-7, Ex.J ¶¶ 2-3; *id.*, Ex.K ¶ 24. Unsurprisingly, plaintiff has offered no evidence of such control. *A fortiori* this Court “ha[s] no option but to dismiss the case,” *id.* (internal quotations omitted), to the extent it is founded upon the media’s republication of the statement.

A. Plaintiff’s argument against summary judgment is substantially groundless.

A legal argument is frivolous if it is presented contrary to a “long line of authorities” and the “fundamental principles”¹ of the underlying substantive law. Plaintiff Giuffre’s argument opposing summary judgment as to republication is frivolous.

The New York Court of Appeals in *Geraci* followed a long line of New York cases holding that a defamation defendant is not liable for republication of his allegedly defamatory statement unless he had “actual authority” to control the decision to republish: “Our

¹*Porky Prods. v. Nippon Exp. U.S.A.*, 1 F.Supp.2d 227, 234 (S.D.N.Y. 1997), *aff’d*, 152 F.3d 920 (2d Cir. 1998).

republication liability standard has been consistent for more than one hundred years.” See

Geraci, 938 N.E.2d at 921 (footnote omitted). Indeed, the *Geraci* court observed, the New York

Court of Appeals in *Schoepflin v. Coffey*,² a case decided in 1900, held:

“*It is too well settled to be now questioned that one who . . . prints and publishes a libel[] is not responsible for its voluntary and unjustifiable repetition, without his authority or request, by others over whom he has no control and who thereby make themselves liable to the person injured, and that such repetition cannot be considered in law a necessary, natural and probable consequence of the original slander or libel.*”

938 N.E.2d at 921 (emphasis supplied; quoting *Schoepflin*, 56 N.E. at 504).

The cases in which this Court and its sister courts in this Circuit assiduously have followed this line of New York cases are legion.³ The Second Circuit was in the vanguard.⁴

²56 N.E. 502 (N.Y. 1900).

³See *Egiazaryan v. Zalmayev*, 880 F. Supp. 2d 494, 501 (S.D.N.Y. 2012) (“[t]he original publisher is not liable for republication where he had ‘nothing to do with the decision to [republish] and [he] had no control over it.’”) (quoting *Rinaldi v. Viking Penguin, Inc.*, 425 N.Y.S.2d 101, 104 (1st Dep’t 1980), *aff’d*, 420 N.E.2d 377 (N.Y. 1981)); *Egiazaryan v. Zalmayev*, No. 11 CIV. 2670 PKC, 2011 WL 6097136, at *5 (S.D.N.Y. Dec. 7, 2011) (same); *Davis v. Costa-Gavras*, 595 F. Supp. 982, 988 (S.D.N.Y. 1984) (“Under New York law, liability for a subsequent republication must be based on real authority to influence the final product, not upon evidence of acquiescence or peripheral involvement in the republication process.”); *Davis*, 580 F. Supp. at 1094 (original publisher not liable for injuries caused by the republication “‘absent a showing that they approved or participated in some other manner in the activities of the third party republisher’”) (quoting *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557, 560 (N.Y. 1980)); *Croy v. A.O. Fox Mem’l Hosp.*, 68 F. Supp. 2d 136, 144 (N.D.N.Y. 1999) (“The original author of a document may not be held personally liable for injuries arising from its subsequent republication absent a showing that the original author approved or participated in some other manner in the activities of the third-party republisher.”) (citations omitted); *Cerasani v. Sony Corp.*, 991 F. Supp. 343, 351 (S.D.N.Y. 1998) (“a libel plaintiff must allege that the party had authority or control over, or somehow ratified or approved, the republication”).

⁴See *Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906) (affirming directed verdict in favor of managing editor: “when it appears affirmatively that he was not on duty [upon receipt of libelous matter and its republication], and could not have had any actual part in composing or publishing, we think he cannot be held liable without disregarding the settled rule of law by which no man is bound for the tortious act of another over whom *he has not a master’s power of control*”) (emphasis supplied), *quoted with approval in Davis I*, 580 F. Supp. at 1096; *Cerasani*, 991 F. Supp. at 351.

In the face of this uninterrupted line of New York state (and federal) cases dating back to the nineteenth century powerfully establishing a bright line rule regarding republication liability, plaintiff Giuffre manages what amounts to a—frivolous—murmur of opposition. She claims there are “[t]wo standards” in New York law: one “older,” and one “more modern.” Resp. 28. The “older” standard, plaintiff says, is represented by the legion of cases we have cited. The “more modern formulation”—where can it be found? Why, in one place: a treatise on defamation. *Id.* (citing *Sack on Defamation* § 2.7.2, at 2-113 to -114 (4th ed. 2016)). It surely is frivolous to argue that a treatise creates a republication-liability standard that is separate from, “more modern” than, and supersedes the New York Court of Appeals’ 2010 decision in *Geraci* and this Court’s 2012 decision in *Egiazaryan*.

Trying to build on this start, plaintiff argues, “New York appellate courts have *repeatedly held* than an individual is liable for the media publishing that individual’s defamatory press release.” Resp. 28 (emphasis supplied). Even if we accept plaintiff’s mischaracterization of the January 2015 statement as a “press release,”⁵ her argument still would be meritless. To begin with, when plaintiff says the New York appellate courts have “repeatedly” supported her claimed rule of law, she means . . . twice. And an examination of those two cases reveals she is quite wrong and, worse, has advanced a seriously misleading argument. Neither case involved, as here, a motion for summary judgment. In both cases, the New York appellate division affirmed the denial of a motion to dismiss under the state’s equivalent of Federal Rule of Civil Procedure 12(b)(6). *See Levy v. Smith*, 18 N.Y.S.3d 438, 439 (2d Dep’t 2015); *National Puerto Rican Day Parade, Inc. v. Casa Pubs.* (“NPR”), 914 N.Y.S.2d 120, 122-23 (1st Dep’t 2010).

⁵As discussed in This Reply, at 16-19, the January 2015 statement would be a strange “press release,” as it threatened to sue the very press to which it was “releasing” information.

This argument, too, is frivolous. Despite plaintiff's baseless claim there is an "old" formulation and a "more modern" formulation of republication-liability law in New York, both cases she cites *applied the same "old" standard used by the New York Court of Appeals in Geraci, by this Court in the two Egiazaryan cases*, and by us in our Memorandum of Law in support of Ms. Maxwell's motion for summary judgment. *See Levy*, 18 N.Y.S.3d at 439 (citing *Geraci* and *Schoepflin*); *NPR*, 914 N.Y.S.2d at 594-95 (citing *Hoffman v. Landers*, 537 N.Y.S.2d 228, 231 (2d Dep't 1989) (citing *Schoepflin*)).

Both the courts in *Levy* and *NPR* applied the *Geraci* standard and the 12(b)(6) standards, e.g., assuming the pleaded facts were true. They concluded it was possible to infer from the complaints' allegations that the defendant caused the republications. Accordingly, they denied the motions to dismiss. *See Levy*, 18 N.Y.S.2d at 439; *NPR*, 914 N.Y.S.2d at 123. It was improper for plaintiff to cite these cases without disclosing they are 12(b)(6) cases in which the courts applied the *Geraci* republication rule and inferred facts from the pleaded allegations.

B. New York state and federal courts have rejected liability for republication based on "foreseeability."

Plaintiff cites section 576 of the Restatement (Second) of Torts for the proposition that if republication was foreseeable, then the defendant is the cause of any special damages from the republication. This argument is frivolous. As an initial matter, plaintiff has pleaded no special damages. *See Doc.1*; *Doc.23* at 23; *Doc.37* at 17.

Regardless, the New York Court of Appeals in *Geraci* *rejected* the Restatement's foreseeability doctrine. *See* 938 N.E.2d at 921-22 (noting that section 576's foreseeability standard "is not nearly as broad as plaintiff . . . suggest[s]" and "[t]hat we did not endorse such a broad [Restatement] standard of foreseeability in *Karaduman* is evident from our decision the following year in *Rinaldi*") (emphasis supplied).

While trying to distinguish this Court’s decision in *Davis*, plaintiff fails to disclose that *Davis* itself—decided 26 years before *Geraci*—also *rejected* plaintiff’s foreseeability argument. The *Davis* plaintiffs, like plaintiff Giuffre here, also asserted republication liability, despite defendant’s lack of participation, on the ground “he could reasonably have foreseen that republication would occur.” 580 F.Supp. at 1096. This Court, relying on *Karaduman*, was unpersuaded: The New York Court of Appeals “has not applied the foreseeability standard suggested by plaintiffs in prior libel cases in which such a standard would have been relevant, if not controlling.” *Id.* This Court noted: The jurisdictions that have adopted a foreseeability standard “have refused to hold responsible a defendant with no control or influence over the entity that actually republished the statement.” *Id.* Plaintiff’s failure to disclose this Court’s holdings in *Davis* is a notable lapse in candor.

C. Plaintiff’s purported application of the *Geraci* rule is misleading and wrong.

Plaintiff eventually purports to apply the “old” standard, that is to say, the controlling law in the state of New York. She argues Ms. Maxwell “authorized” the January 2015 statement, “paid money to her publicist to convince media outlets to publish it,” “request[ed]” its publication, “made a deliberate decision to publish her press release,” “actively participated” in “the decision to publish her press release,” was “active” in “influencing the media to publish” the statement, and “approved of” and “pushed for” the publication of the statement. Resp. 30-31. These argument-manufactured facts have no record support.

In applying the controlling law, plaintiff wittingly makes a mess of it. She disingenuously suggests any help Ms. Maxwell gave to help her lawyer prepare the January 2015 statement and her signing-off on it are the equivalent of requesting, authorizing and controlling its *republication*. That isn’t the law. The “authority” required for republication liability is the “actual authority . . . to *decide upon or implement*” the republication. 580 F.Supp. at 1095

(emphasis supplied; citing *Rinaldi*, 420 N.E.2d at 382). Judge Sofaer studied *Rinaldi*'s holding, and noted republication liability must be based on a "decision" by the defendant to republish and must focus on "real authority to influence the final product, *not upon evidence of acquiescence or peripheral involvement in the republication process.*" *Id.* at 1096 (emphasis supplied).

Accordingly, Judge Sofaer held, when there is "conclusive evidence of lack of actual authority" this is "dispositive" of republication liability and the trial court "'ha[s] no option but to dismiss the case against the [defendant].'" *Id.* (emphasis supplied; quoting *Rinaldi*, 420 N.E.2d at 382).

There is no evidence Ms. Maxwell "paid money to her publicist to convince" the media to publish her statement; this is why plaintiff cites no evidence to support that assertion. *See* Resp. 30. Mr. Gow's email containing the statement says nothing to "convince" the media to publish the statement. *See* Doc.542-6, Ex.F. There is no evidence Ms. Maxwell was "active" in "influencing the media to publish" it; nor is there any evidence she "pushed for" or "requested" its publication; this is why plaintiff cites no evidence to support these assertions. *See id.* 31.

Indeed, plaintiff has zero evidence Ms. Maxwell or her agents ever did anything to urge or request any media to publish the statement. Mr. Gow presented the January 2015 statement via email to six to thirty media representatives; it was not sent to anyone else; in the email he told the journalists he was presenting a "quotable statement" "on behalf of" Ms. Maxwell and "[n]o further communication will be provided." Doc.542-6, Ex.F. It is undisputed Ms. Maxwell and her agents had no control over the media that republished portions of the statement. Doc.542-7, 542-7, Ex.J ¶¶ 2-3; *id.*, Ex.K ¶ 24.

Plaintiff argues "a jury" should decide whether Ms. Maxwell "authorized or intended" the statement to be republished, or "approved of, and even participated, in" its republication. Resp. 30-31. All plaintiffs want to get to "a jury." The summary-judgment question is whether they deserve to. Plaintiff has offered no evidence to put before a jury on the dispositive *Geraci*

question: whether Ms. Maxwell affirmatively authorized or requested a person or entity “over whom [s]he has . . . control,” 938 N.E.2d at 921. The only new argument plaintiff makes in her entreaty to see “a jury” is that she should be permitted to prove Ms. Maxwell’s “complicity.” As with her other factually bereft arguments, the complicity argument awaits plaintiff’s introduction of facts to support it. Having failed to do so, plaintiff cannot avoid summary judgment.

Plaintiff labors in vain to turn the Barden Declaration into “disputed issues of fact.” For there to be a disputed factual issue, plaintiff would need to introduce evidence disputing his sworn statements. She has not done so. In any event, the Barden Declaration is all but irrelevant to the central, dispositive republication question: whether Ms. Maxwell is liable for the media’s republication of her statement, where they did so without her authority or request and where she and her agents had “no control”⁶ over the media. On this question we cited to the Barden Declaration for one evidentiary fact: Messrs. Barden and Gow had no control over the media.⁷ See Doc.542-7, Ex.K ¶ 24, *cited in* Memo. of Law 14.⁸ Plaintiff has offered no admissible evidence disputing this fact.

“[T]here is no issue for trial unless there is sufficient evidence favoring the nonmoving party for a jury to return a verdict for that party.” *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 249 (1986). It is one thing to argue in conclusory fashion, as plaintiff does, that “a jury” should decide a factual question. It is quite another to identify evidence in the Rule 56 record that raises a genuine question of material fact, which plaintiff does not do. Summary judgment is warranted.

⁶*Geraci*, 938 N.E.2d at 921.

⁷As discussed in Argument I.D., below, we cited more plenarily to the Barden Declaration in connection with a different point—the particular unfairness of subjecting Ms. Maxwell to liability when the media selectively quoted portions of the January 15 statement.

⁸In the Memorandum, we erroneously cited to ¶ 24 of Exhibit J; we intended to cite to ¶ 24 of Exhibit K (Doc.542-1, Ex.K), which is Mr. Barden’s declaration.

D. Subjecting Ms. Maxwell to liability for the media's republication of excerpts they unilaterally selected is particularly unfair.

It is undisputed that no one ever republished *in toto* the January 2015 statement and that various media unilaterally selected portions of the statement to republish. We said on page 14 of our Memorandum that the media's "selective, partial republication of the statement is *more problematic yet*" (emphasis altered). That is to say, as improper as it is to hold a publisher of a statement liable for republications over which she had no control, worse is it to make her liable for selective, partial republications of her statement. We relied on the holding in *Rand v. New York Times Co.*, 430 N.Y.S.2d 271, 275 (1st Dep't 1980), that a publisher cannot be charged with a republisher's "editing and excerpting of her statement." Memo. of Law 14.

Plaintiff argues that our position is "absurd on its face" because "[i]t would mean . . . a defamer could send to the media a long attack on a victim with one irrelevant sentence and, when the media quite predictably cut that sentence, escape liability." Resp. 32. This argument has two erroneous assumptions. One is that the "defamer" can "escape liability." Not true. An original publisher remains liable for her defamation. We are concerned here with *republication*. The second wrong assumption is that the original publisher must always remain liable for any republication. *Geraci* rejects that view: Under New York law "each person who repeats the defamatory statement is responsible for the resulting damages." 938 N.E.2d at 921.

The effort by plaintiff to distinguish *Rand* is meritless. She argues the media's republication of the January 2015 statement actually was not a republication at all, just an original publication. Resp. 32. *That* argument is "absurd on its face," *id.*, since there is no dispute Ms. Maxwell did not control the media's decision to republish (excerpts from) the statement. Plaintiff next argues the media did not "edit[]" or "tak[e] . . . quote[s] out of context." *Id.* Plaintiff could not be more wrong. As she concedes, all republications of the statement by the

media were selective, partial republications of the statement. Any such selective, partial republication by definition took those excerpts “out of context.” This is so because Mr. Gow informed the media in his email that he was providing “a quotable statement,” Doc.542-6, Ex.F, not a statement “from which you, the media, are free to excerpt as you please.”

More importantly, as Mr. Barden explained, selectively excerpting the statement substantially altered his message. *See id.*, Ex.K ¶ 20. For example, when he said in the third paragraph that plaintiff’s claims are “obvious lies,” it followed two paragraphs in which he explained *why* it was obvious the new claims are lies. *See id.*, Ex.K ¶¶ 19-22. Excerpting and republishing only the “obvious lies” phrase—as plaintiff did in her complaint—certainly gives the reader a different understanding than if the media had republished the entire statement. As *Rand* held: A defendant cannot be liable for the republication of derogatory but constitutionally protected opinion “when the foundation upon which that opinion is based is omitted. The defamatory remark should be read against the background of its issuance.” 430 N.Y.S.2d at 275 (internal quotations omitted).

Plaintiff argues: “A jury could reasonably conclude that [Ms. Maxwell’s] statement that Ms. Giuffre’s *claims of child sexual abuse* are ‘obvious lies’ is not a rhetorical device, nor hyperbole, but a literal and particular affirmation that [plaintiff] lied.” Resp. 33 (emphasis supplied). We italicize plaintiff’s rhetorical sleight of hand. As plaintiff knows, nowhere did the January 2015 statement specify which of plaintiff’s countless allegations are “obvious lies.” Indeed, this is the problem with plaintiff’s case: since the statement specified no particular allegations as obvious lies, plaintiff believes she is entitled to “prove” the truth of every allegation she ever has made about her alleged experience as a “sex slave.” What Mr. Barden’s declaration makes clear is he deliberately made no reference to any specific allegation by plaintiff. He had a bigger target: plaintiff’s credibility. He used the statement to show plaintiff’s

behavior is that of a liar, i.e., one who increasingly embellishes her story, and her allegations become more and more outlandish, so that by January 2015 she was claiming to have had sex with a well respected Harvard law professor, Alan Dershowitz. *See* Doc.542-7, Ex.K ¶¶ 19-22.

Contrary to plaintiff’s argument, “even apparent statements of fact may assume the character of statements of opinion, and thus be privileged, when made in public debate . . . or other circumstances in which an audience may anticipate the use of epithets, fiery rhetoric or hyperbole.” *Steinhilber v. Alphonse*, 501 N.E.2d 550, 556 (N.Y. 1986) (internal quotations and brackets omitted). That was the case here. Plaintiff falsely—and, as Judge Marra held, “unnecessar[ily]”⁹—alleged in lurid detail that Ms. Maxwell had sexually abused her. The six to thirty journalists would have anticipated a “fiery” denial of the allegations. Regardless, the statement overall was constitutionally protected opinion grounded on facts disclosed to the journalists: plaintiff’s increasingly outlandish and inconsistent stories, her newly embellished allegations, and her increasingly lurid and salacious enhancements of her earlier allegations.

E. Mr. Barden’s declaration is perfectly proper.

Plaintiff makes a plethora of complaints about Mr. Barden’s declarations. None has any merit. She objects to Mr. Barden’s declaration of his intent and purposes for preparing the January 2015 statement because, she says, this implicates the attorney-client privilege. That is untrue. His intent and purposes are by definition *not* attorney-client communications and do not implicate such communications; they are attorney work product,¹⁰ which he is free to disclose.¹¹

⁹Doc.542-5, Ex.E, at 5.

¹⁰*Travelers Indem. Co. v. Northrop Grumman Corp.*, No. 12 CIV. 3040 KBF, 2013 WL 3055437, at *3 (S.D.N.Y. Apr. 22, 2013) (identifying work product as including defense counsel’s “mental impressions, thought processes and strategies connected with [the] defense”).

¹¹*See In re China Med. Techs., Inc.*, 539 B.R. 643, 658 (S.D.N.Y. 2015)

She objects he is “non-deposed.” But Mr. Barden was the third-listed potential witness in our Rule 26(a)(1)(A) disclosure, served on plaintiff a year ago; the disclosure said he “has knowledge concerning press statements by . . . Defendant in 2011-2015 at issue in this matter.”¹² Plaintiff was free to depose him; that she chose not to was her own tactical decision. Finally, plaintiff argues “there are factual disputes” regarding the declaration. But plaintiff identified no such factual disputes relating to the declaration. A party opposing summary judgment cannot create a dispute by arguing, which is all plaintiff does. *See* Resp. 35-38.

F. Plaintiff effectively has confessed Arguments I.B. and I.C. of the Memorandum.

Argument I.B. of the Memorandum contends the First Amendment bars liability for republication by media organizations of the January 2015 statement. *See* Memo. of Law 16-17. Argument I.C. contends that under *Geraci* plaintiff is barred from introducing into evidence any of the media organizations’ republication of the January 2015 statement. *See id.* at 17-18. Plaintiff offers no resistance to these arguments. We respectfully request that the Court consider these arguments confessed. *See, e.g., Cowan v. City of Mount Vernon*, 95 F. Supp. 3d 624, 645-46 (S.D.N.Y. 2015) (citing cases).

II. The January 2015 statement is constitutionally protected opinion.

In deciding whether a statement is opinion the New York Constitution requires application of “the widely used four-part *Ollman*^[13] formula,” *Immuno AG v. Moor-Jankowski*, 567 N.E.2d 1270, 1274 (N.Y. 1991). *See id.* at 1274, 1277-78, 1280-82 (noting *Steinhilber*’s adoption of formula). We addressed each of the four *Ollman* factors. The plaintiff avoids this analysis, choosing merely to block-quote large portions of this Court’s Rule 12(b)(6) order. That

¹²Menninger Decl. EXHIBIT NN, at 2.

¹³*Ollman v. Evans*, 750 F.2d 970 (D.C. Cir. 1984).

is a mistake. *Immuno AG* is the seminal case prescribing the analysis to be used in a *summary-judgment proceeding* for assessing whether under the New York Constitution a statement is absolutely protected as opinion.

Instead of addressing the four factors, plaintiff simply relies on this Court's 12(b)(6) order. The Court's order does not control. In deciding the Rule 12(b)(6) motion, the Court assumed the complaint's allegations were true and drew all reasonable inferences in plaintiff's favor. In this proceeding, plaintiff is not entitled either to the assumption or the inferences. The opinion-versus-fact question will be controlled by the Rule 56 record.

Relying on the Court's order, plaintiff argues that the question whether the three allegedly defamatory sentences are opinion or fact is controlled by *Davis v. Boenheim*, 22 N.E.3d 999 (N.Y. 2014), and *Green v. Cosby*, 138 F. Supp. 3d 114 (D. Mass. 2015). *See* Resp. 38. *Davis* was an appeal from a 12(b)(6) dismissal. This procedural posture was critical to its decision:

[D]efendants argue that because a reader could interpret the statement as pure opinion, the statement is as a consequence, nonactionable and was properly dismissed [pursuant to a pre-answer motion]. However, on a motion to dismiss we consider whether any reading of the complaint supports the defamation claim. Thus, although it may well be that the challenged statements are subject to defendants' interpretation, the motion to dismiss must be denied if the communication at issue, taking the words in their ordinary meaning and in context, is also susceptible to a defamatory connotation. We find this complaint to meet this minimum pleading requirement.

Davis, 22 N.E.3d at 1006-07 (internal quotations, brackets, ellipsis and citations omitted).

Green was a decision on the defendant's motion to dismiss. The case was decided under *California* and *Florida* defamation law. *See* 138 F. Supp. 3d at 124, 130, 136-37. The court made it clear the 12(b)(6) procedural posture was critical to its decision: "At this stage of the litigation, the court's concern is whether any fact contained in or implied by an allegedly defamatory statement is susceptible to being proved true or false; if so capable, Defendant cannot avoid application of defamation law by claiming the statement expresses only opinion." *Id.* at 130.

In the case at bar, application of the four *Steinhilber* factors on the Rule 56 record compels a different conclusion. The complaint alleges three sentences in the January 2015 statement are defamatory: in the first paragraph of the statement, plaintiff Giuffre's allegations are "untrue"; in the same paragraph, the "original allegations" have been "shown to be untrue"; and in the third paragraph, plaintiff's "claims are obvious lies."¹⁴ Doc.1 ¶ 30.

Factor 1: Indefiniteness and ambiguity. On the face of the complaint in a 12(b)(6) proceeding, the words "untrue" and "obvious lies" might be susceptible of "a specific and readily understood factual meaning," Doc.37 at 9. This is especially true if it is taken out of context, e.g., extracted from the statement. But this approach is forbidden. *See, e.g., Law Firm of Daniel P. Foster, P.C. v. Turner Broad. Sys.*, 844 F.2d 955, 959 (2d Cir. 1988).

The first sentence—"[t]he allegations made by [plaintiff] against [Ms. Maxwell] are untrue"—is indefinite and ambiguous because it is wholly unclear which "allegations" are being referenced. The second sentence—"[t]he original allegations . . . have been fully responded to and shown to be untrue"—also is indefinite and ambiguous for the same reason. Additionally, it is unclear what are the "original" allegations. It is unclear what is meant by "shown to be untrue." What one person may believe is a fact shown to be untrue, another person may believe is a fact not (sufficiently) shown to be untrue. The existence of God, climate change and existence of widespread voter fraud in the election are examples of this. The third sentence—

¹⁴Ms. Maxwell testified in her deposition that she "know[s]" plaintiff is a "liar." This testimony, plaintiff argues, "contradict[s]" our contention that the three allegedly defamatory sentences in the July 2015 statement are opinion. Resp. 39-40. Plaintiff's argument is a *non-sequitur*. Ms. Maxwell's 2016 deposition testimony in which she disclosed all the reasons she believes plaintiff has uttered a plethora of false allegations is irrelevant to whether the three sentences in the July 2015 statement, prepared by Mr. Barden to respond to the joint-motion allegations, are opinions.

“[plaintiff’s] claims are obvious lies”—also is indefinite and ambiguous. An “obvious lie” to one person is not an “obvious lie” to another.

Factor 2: Capable of being characterized as true or false. On the 12(b)(6) record, the Court held the three statements “are capable of being proven true or false.” Doc.37 at 9. As a general question of law, one person’s statement that another person’s allegations are “untrue” or are “obvious lies” is not necessarily capable of being proved true or false—regardless of the subject matter of the opined “untruths” or “lies.” *See Rizzuto v. Nexxus Prod. Co.*, 641 F. Supp. 473, 481 (S.D.N.Y. 1986), *aff’d*, 810 F.2d 1161 (2d Cir. 1986); *Telephone Sys. Int’l v. Cecil*, No. 02 CV 9315(GBD), 2003 WL 22232908, at *2 (S.D.N.Y. Sept. 29, 2003); Memo. of Law 35 (citing cases). As *Steinhilber* observed, “even apparent statements of fact may assume the character of statements of opinion, and thus be privileged.” 501 N.E.2d at 556.

At least two of plaintiff’s CVRA allegations cannot be proven true or false (only two such allegations are needed in order to render the January 15 statement an opinion). We have identified two such allegations in the joinder motion: that Ms. Maxwell “appreciated the immunity granted” to Epstein, and that she “act[ed] as a ‘madame’ for Epstein.” Memo. of Law 22. Plaintiff does not dispute this. The result is that the January 15 statement’s assertion that plaintiff’s “allegations” and “claims” in the joint motion are “untrue” or “obvious lies” is by definition an opinion. It cannot be proven true or false whether Ms. Maxwell “appreciated” Epstein’s immunity or whether she “acted as a madame.” Indeed, it seems quite obvious that the joinder-motion allegations about “appreciation” and “madame” *are themselves opinion*.

In the statement, Mr. Barden on behalf of Ms. Maxwell also says plaintiff’s “original allegations . . . have been fully responded to and shown to be untrue.” Doc.542-6, Ex.F. This cannot be proven true or false. The “full response” to the original allegations is a reference to the “Statement on Behalf of Ghislaine Maxwell” issued March 9, 2011, in response to plaintiff’s

allegations contained in media stories, including the Churcher articles. *See* Doc.542-3, Ex.C. Whether the 2011 statement “fully” responded to the original allegations and whether it “showed” the original allegations to be untrue are pure (argumentative) opinion. “[O]bvious lies” on its face is an opinion. The “obviousness” of a lie simply cannot be proven true or false.

Factor 3: The full context of the statement. Three contextual facts are revealed by the Rule 56 record. **One**, the email transmitting the statement to the media-representatives—along with the third-person references to Ms. Maxwell—told them Ms. Maxwell did not prepare the statement: “Please find attached a quotable statement *on behalf of* Ms. Maxwell.” Doc.542-6, Ex.F (emphasis supplied). It is undisputed that in fact Mr. Barden prepared the bulk of it and ultimately approved and adopted as his work all of it. Doc.542-7, Ex.K ¶ 10.

Two, Mr. Barden’s statement issued on behalf of his client would not be a traditional press release solely to disseminate information to the media; this is why he did not request Mr. Gow or any other public relations specialist to prepare or participate in preparing the statement. *Id.*, Ex.K ¶ 15. The statement was a broad-brush communique to the media about plaintiff and her new allegations; it was not to be a “point by point” rebuttal of each new allegation. *Id.*, Ex.K ¶ 13. The logic and approach to preparing the statement were simple: compare plaintiff’s prior allegations and conduct in telling her story with her current allegations and conduct. *See generally id.*, Ex.K ¶ 13. When he wrote the statement, he knew of plaintiff’s 2011 allegation that she had *not* had sex with Prince Andrew and he knew of her CVRA allegation that she *did* have sex with him. *Id.*, Ex.K ¶ 14. Also within his knowledge was the story she had told Churcher before March 2011—a story that was far *less* provocative and salacious than the one she included in the joinder motion. *See id.*, Ex.K ¶ 5; *compare* Docs.542-1 & 542-2, Exs.A & B (Churcher articles published March 2011) *with* Doc.542-4, Ex.D (plaintiff’s joinder motion containing dramatically different and more lurid and salacious allegations).

Mr. Barden's approach provides critical context to explaining how the statement builds a logical argument that the new allegations are false. It first notes plaintiff's "original allegations"; then it points out how the story changed and was embellished over time, "now" with allegations that plaintiff had sex with a prominent and highly respected Harvard law professor ("Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders . . ."). The argument builds up to the opinion in the third paragraph: "[Plaintiff's] claims are obvious lies and should be treated as such" Doc.542-6, Ex.F. *See generally id.*, Ex.K ¶¶ 13-22. This third paragraph—and the threat in the fourth paragraph to sue the media for republication of plaintiff's falsehoods—confirms what is plain from the statement itself: it was not a traditional press release.

Three, the statement was intended to respond (via denial) to the media-recipients' requests for a reply to the new CVRA joinder-motion allegations. *Id.* ¶¶ 8, 10, 16. But more than that, it was intended to be "a shot across the bow" of the media. *Id.* ¶ 17. The logical argument was created to (a) persuade the media-recipients that they needed to "subject plaintiff's allegations to inquiry and scrutiny"; (b) explain to the media-recipients how it was "obvious" that plaintiff "had no credibility" because of her shifting story and increasingly lurid and salacious allegations as time went on, many of which (e.g., the allegations of sex with Prince Andrew and Professor Dershowitz) on their face appear far-fetched,¹⁵ and (c) warn the media-

¹⁵Since the CVRA joinder motion, there has emerged a substantial amount of evidence—some from plaintiff's own pen—that plaintiff's allegations about having been "forced" to have sex with prominent individuals are falsehoods. A telling example is a series of emails between plaintiff and reporter Churcher when plaintiff was working on negotiating a book deal about her alleged experiences and Churcher was trying to help her. On May 10, 2011, plaintiff tells Churcher she cannot remember whom she had told Churcher she had had sex with. Churcher responds, "Don't forget Alan Dershowitz," which Churcher says is a "good name for [plaintiff's] pitch" to her literary agent. It is clear neither Churcher nor plaintiff believed plaintiff

recipients that they republished plaintiff's obvious falsehoods against Ms. Maxwell at their legal peril. *See id.* ¶¶ 13, 16, 17, 20.

As the New York Court of Appeals observed, the context of a statement often is the “key consideration” in fact vs. opinion cases. *Davis*, 22 N.E.3d at 1006. So it is here. As *Davis* suggested, the three challenged statements are “subject to [Ms. Maxwell's] interpretation,” *id.* at 1007; accord *Sweeney v. Prisoners' Legal Servs. of N.Y.*, 538 N.Y.S.2d 370, 371-72 (3d Dep't 1989). The context of the January 2015 statement makes clear that the characterization of plaintiff's allegations and claims as “untrue” or “obvious lies” are ultimate opinions—conclusions—drawn from disclosed facts.

Factor 4: The broader setting surrounding the statement, including conventions that might signal to readers that the statement likely is opinion and not fact. It is undisputed that the January 2015 statement was sent exclusively to more than six and fewer than thirty media representatives, each of whom expressly had requested from Mr. Gow that he provide them with Ms. Maxwell's reply to the new joint-motion allegations. Doc.542-7, Ex.K ¶¶ 8, 10. As was obvious from the statement, it was not a traditional press release, as such a release does not explain—lawyer-like—why new allegations when measured against previous allegations lack credibility. Nor does a traditional release threaten to sue the media to whom the release is sent. The media representatives upon receiving the January 2015 statement would have understood it was presenting an (opinionated) argument that plaintiff was not credible because of her

had had sex with Professor Dershowitz, since (a) Churcher suggests that he would be a “good name” to “pitch” *because* of his prominence (“he [represented] Claus von Bulow and a movie was made about that case...title was Reversal of Fortune”), and (b) Churcher states, “We all *suspect* [Professor Dershowitz] is a pedo[phile] and tho *no proof of that*, you probably met him when he was hanging put w [Epstein].” Menninger Decl., EXHIBIT.OO, at Giuffre004096-97 (emphasis supplied).

inconsistent and shifting sex abuse story and her increasingly lurid allegations against more and more prominent individuals. And they would have understood that these characteristics of a storyteller undermine her credibility and *ergo* the credibility of her new allegations.

In its 12(b)(6) order the Court said the three sentences have the effect of denying plaintiff's story but "they also clearly constitute fact to the reader." The ruling is affected in two ways by the Rule 56 record. Based on the foregoing discussion of the evidence, the three sentences clearly constitute (argumentative) opinions of Mr. Barden on behalf of Ms. Maxwell.

Though the Court did not discuss who is "the reader," this is important in *Steinhilber* Factor 4." Under settled defamation-opinion law, an allegedly defamatory statement is to be viewed "from the perspective of the audience to whom it is addressed." *Dibella v. Hopkins*, No. 01 CIV. 11779 (DC), 2002 WL 31427362, at *2 (S.D.N.Y. Oct. 30, 2002). Here, "the reader" is six to thirty journalists. They could not have read the July 2015 statement—or the three allegedly defamatory sentences—the same way it was read by these journalists' audience, i.e., the general public. This is because, as plaintiff implicitly concedes, these journalists only republished excerpts—and not the entirety of the statement, which would have given context to the three sentences. It is axiomatic that an out-of-context republication of the three sentences—without the rest of the statement—would deprive the reader of the logic and reasoning behind the opinionated conclusion that plaintiff was making "untrue" allegations and telling "obvious lies."

III. The pre-litigation privilege bars this action.

A. The privilege applies to the January 2015 statement.

Statements pertinent to a good faith anticipated litigation made by attorneys (or their agents under their direction¹⁶) before the commencement of litigation are privileged and “no cause of action for defamation can be based on those statements,” *Front, Inc. v. Khalil*, 28 N.E.3d 15, 16 (N.Y. 2015). The facts that must be established, therefore, are (a) a statement, (b) that is pertinent to a good faith anticipated litigation, and (c) by attorneys or their agents under their direction. We did this. *See* Memo. of Law 6-8, 33-38; Doc.542-7, Ex.K ¶¶ 8-30. For example, Mr. Barden (a) drafted the vast majority of the January 2015 statement and approved and adopted all of it, (b) directed Mr. Gow to send it to the media representatives who had requested Ms. Maxwell’s reply to plaintiff’s joint-motion allegations, (c) in the statement threatened legal action against these media representatives, and (d) at the time of the statement “was contemplating litigation against the press-recipients.” *Id.*, Ex.K ¶¶ 10, 16-17, 28, 30.

Plaintiff argues without citation to authority: Ms. Maxwell herself did not testify she intended to sue; she hasn’t offered any witnesses to testify she intended to bring a lawsuit; she didn’t in fact sue; and—this one is a *non-sequitur*—the statement was an “attempt[] to continue to conceal her criminal acts.” Resp. 41-42. These arguments fail. The privilege exists without regard to whether *Ms. Maxwell* testifies she “intended” to sue, whether she has “witnesses” to say she intended to sue, or whether she “in fact” sued. It refers to “anticipated” litigation, not “guaranteed” litigation. Indeed, the point of the pre-litigation privilege is to promote communications that *avoid* litigation. *See Khalil*, 28 N.E.3d at 19 (“When litigation is

¹⁶*See Chambers v. Wells Fargo Bank, N.A.*, No. CV 15-6976 (JBS/JS), 2016 WL 3533998, at *8 (D.N.J. June 28, 2016); *see generally Hawkins v. Harris*, 661 A.2d 284, 289-91 (N.J. 1995).

anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation.”). It applies when there is a good faith basis to *anticipate* litigation. Mr. Barden, Ms. Maxwell’s lawyer who *drafted and caused the statement to be sent out*, actually was anticipating litigation. Doc.542-7, Ex.K ¶ 28. The argument that the statement was an attempt to “conceal” Ms. Maxwell’s “criminal acts” is fatuous. It would be hard to *post facto* “conceal” alleged criminal acts that plaintiff luridly and salaciously described in an earlier public filing, i.e., in the CVRA case, in which the United States government was the defendant.

Citing no record evidence, plaintiff argues, “The record evidence shows [Mr. Barden] did not make the [January 2015] statement.” Resp. 42. That argument is easily disposed of by Mr. Barden’s uncontested testimony. *See* Doc.542-7, Ex.K ¶¶ 10-13, 15-17, 20, 26-28, 30.

B. Malice is irrelevant to the pre-litigation privilege.

Citing the New York Court of Appeals’ decision in *Khalil*, we pointed out that malice is not relevant to the pre-litigation privilege. Memo. of Law 34-35. To prevail on the pre-litigation privilege the defendant need only establish one element: the allegedly defamatory statement at issue was “pertinent to a good faith anticipated litigation.” *Id.* (quoting *Khalil*, 28 N.E.3d at 16). Plaintiff disputes this and, without discussing *Khalil* or citing authorities, simply argues the pre-litigation privilege is “foreclosed . . . because [Ms. Maxwell] acted with malice.” Resp. 43. As suggested by her inability to find any law to support her, plaintiff is wrong.

Under general New York defamation law, “[t]he shield provided by a qualified privilege may be dissolved” if plaintiff in rebuttal can show that the defendant “spoke with ‘malice.’” *Lieberman v. Gelstein*, 605 N.E.2d 344, 349 (N.Y. 1992); *accord Khalil*, 28 N.E.3d at 19. “Malice” means two things: spite or ill will, and knowledge of falsity or reckless disregard of falsity. *Lieberman*, 605 N.E.2d at 349. Plaintiff relies on this general qualified-privilege law.

The problem for plaintiff is that in *Khalil* the New York Court of Appeals held this general rule does not apply to the pre-litigation privilege. Khalil worked for a company named Front. After eight years, he resigned and began working for “EOC,” one of Front’s competitors. Front’s lawyer Kimmel sent a demand letter to Khalil alleging he had committed criminal, tortious and ethical misconduct. Kimmel sent another demand letter to EOC and others stating Khalil had conspired with EOC to breach his fiduciary duty to Front. Six months later, Front sued Khalil. Khalil brought a third-party claim against Kimmel for libel *per se*. The trial court dismissed the lawsuit, ruling that the letters were “absolutely privileged” under the litigation privilege “and that it therefore did not need to reach the question of malice.” 28 N.E.3d at 17 (internal quotations omitted). The Appellate Division affirmed, holding that the litigation privilege absolutely protected the letter “because they were issued in the context of prospective litigation.” *Id.* at 18 (internal quotations omitted).

The Court of Appeals affirmed, but altered the law on the litigation privilege. It observed, “Although it is well-settled that statements made *in the course of litigation* are entitled to absolute privilege, this Court has not directly addressed whether statements made by an attorney on behalf of his or her client in connection with *prospective litigation* are privileged.” *Id.* (emphasis supplied). Some Appellate Division departments had held the absolute privilege applies to statements made in connection with prospective litigation, but other departments had held such statements were entitled only to a qualified privilege. *Id.*

The answer to whether pre-litigation statements should be absolute or qualified, the Court of Appeals held, is driven by the rationale for protecting pre-litigation statements:

When litigation is anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation. Attorneys often send cease and desist letters to avoid litigation. . . . Communication during this pre-litigation phase should be encouraged and not chilled by the possibility of being the basis for a defamation suit.

Id. at 19. However, the court recognized that “extending privileged status to communication made prior to anticipated litigation has the potential to be abused”; extending an absolute privilege to this context, the court said, “would be problematic and unnecessary.” *Id.*

The court held it would recognize only a qualified privilege for pre-litigation communications. *Id.* Crucially to the case at bar, the court held that the traditional privilege-rebuttal malice was *inapplicable* to the pre-litigation privilege:

Rather than applying the general malice standard to this pre-litigation stage, the privilege should only be applied to statements pertinent to a good faith anticipated litigation. This requirement ensures that privilege does not protect attorneys who are seeking to bully, harass, or intimidate their client’s adversaries by threatening baseless litigation or by asserting wholly unmeritorious claims, unsupported in law and fact, in violation of counsel’s ethical obligations. Therefore, we hold that statements made prior to the commencement of an anticipated litigation are privileged, and that the privilege is lost where a defendant proves that the statements were not pertinent to a good faith anticipated litigation.

Id. (emphasis supplied).

Accordingly, the only question is whether the January 2015 statement Mr. Barden caused to be issued to the six to thirty journalists was “pertinent to a good faith anticipated litigation.” The undisputed evidence establishes that the answer is yes. Mr. Barden anticipated litigation.¹⁷ He “fully complied with [his] ethical obligation as a lawyer.”¹⁸ He was hardly “bully[ing], harass[ing], or intimidat[ing]” the six to thirty journalists, since he caused a press agent, Mr.

¹⁷See Doc.542-7, Ex.K ¶ 28 (“At the time I directed the issuance of the statement, I was contemplating litigation against the press-recipients”); *id.* ¶ 17 (statement was intended as “a shot across the bow”; “the statement was very much intended as a cease and desist letter to the media-recipients, letting [them] understand the seriousness with which Ms. Maxwell considered the publication of plaintiff’s obviously false allegations and the legal indefensibility of their own conduct”); Doc.542-6, Ex.F (“Maxwell . . . reserves her right to seek redress”).

¹⁸Doc.542-7, Ex.K ¶ 26.

Gow, to issue the statement,¹⁹ and he believed he had an affirmative duty in representing Ms. Maxwell to prepare the statement and cause it to be delivered to the journalists.²⁰

Plaintiff argues that when Mr. Barden issued the January 2015 statement on Ms. Maxwell's behalf, he had only “wholly unmeritorious claims, *unsupported in law and fact*, in violation of counsel's ethical obligations” and did not have “good faith anticipated litigation.” Resp. 46 (quoting *Khalil*, 28 N.E.3d at 19; italics omitted). Plaintiff's rationale? Because she was telling the truth and so the media would only be reporting the truth. *Id.* That is a nonsensical, frivolous argument.

Whether Mr. Barden, who represents Ms. Maxwell, had a meritorious or good faith basis for anticipating defamation litigation has nothing to do with whether the media believed plaintiff was telling the truth, and surely not whether *the plaintiff* believed or said she was telling the truth. Based on his knowledge of plaintiff's history, Mr. Barden in good faith believed that plaintiff had been making false allegations for years and that the falsity of the allegations “should have been obvious to the media.” Doc.542-7, Ex.K ¶ 13; *see id.* ¶¶ 14, 16-17, 20-23, 26-28, 30. Accordingly, at the time he caused the statement to issue, Mr. Barden had a good-faith basis to anticipate litigation against any of the media that republished plaintiff's false allegations.

It hardly matters for purposes of the pre-litigation privilege whether the media republished or did not republish plaintiff's allegations or whether Mr. Barden ultimately did or did not sue any of the media for any republication. As the *Khalil* court recognized, “[a]ttorneys often send cease and desist letters to avoid litigation,” 28 N.E.3d at 19, and such letters have a

¹⁹The *Khalil* court admonished attorneys to “exercise caution when corresponding with unrepresented potential parties who may be particularly susceptible to harassment and unequipped to respond properly even to appropriate communications from an attorney.” *Khalil*, 28 N.E.3d at 19 n.2.

²⁰*See* Doc.542-7, Ex.K ¶ 26.

valid purpose protected by the pre-litigation privilege. Mr. Barden testified that the January 2015 statement in fact served as a cease and desist letter. *See* Doc.542-7, Ex.K ¶ 17.

IV. Ms. Maxwell's January 4, 2015, statement is nonactionable.

Plaintiff did not respond to our argument that Ms. Maxwell's January 4, 2015, statement to a reporter is nonactionable. *See* Memo. of Law 38-39. We respectfully submit plaintiff has confessed this point. *See Cowan*, 95 F. Supp. 3d at 645-46.

V. Summary judgment is warranted because plaintiff cannot establish falsity or actual malice by clear and convincing evidence.

Plaintiff is a public figure. *See* Memo. of Law 16-17, 49-54. Therefore, she must prove falsity and actual malice. Under New York law, a public-figure defamation plaintiff must go beyond the federal constitutional minimum and prove falsity by clear and convincing evidence. *Blair v. Inside Ed. Prods.*, 7 F. Supp. 3d 348, 358 & n.6 (S.D.N.Y. 2014) (citing *DiBella v. Hopkins*, 403 F.3d 102, 111 (2d Cir.2005)). She must also prove actual malice by clear and convincing evidence. *Karedes v. Ackerley Grp., Inc.*, 423 F.3d 107, 114 (2d Cir. 2005) (quoting *Phila. Newspapers v. Hepps*, 475 U.S. 767, 773 (1986)).

Clear and convincing evidence is evidence that “produces in the mind of the trier of fact a firm belief or conviction as to the truth of the allegations sought to be established, evidence so clear, direct and weighty and convincing as to enable the factfinder to come to a clear conviction, without hesitancy, of the truth of the precise facts in issue.” *Blair*, 7 F. Supp. 3d. at 358 (internal quotations and brackets omitted).

Plaintiff must prove by clear and convincing evidence (a) the material falsity of three sentences in the context of the January 2015 statement, and (b) Ms. Maxwell's actual malice, i.e., knowledge of the falsity of the three sentences or reckless disregard of whether they were false. The three sentences are: in the first paragraph of the statement, plaintiff's allegations are

“untrue”; in the same paragraph, the “original allegations” have been “shown to be untrue”; and in the third paragraph, plaintiff’s “claims are obvious lies.”²¹ Doc.1 ¶ 30.

Plaintiff cannot prove the falsity of the three sentences, let alone actual malice. If the Rule 56 record establishes that *two* of plaintiff’s CVRA joinder-motion allegations are false and *two* of her “original” allegations are false, this defamation action collapses on itself. This is because the statement does not specify how many of plaintiff’s allegations are false; it certainly does not say “all” plaintiff’s allegations are false. It uses the plural of “allegation.” The plural of allegation literally means “more than one.” *See* Memo. of Law 21.

Sentence No. 1. Since the sentence does not specify any particular allegation and since plaintiff made a plethora of allegations against Ms. Maxwell, plaintiff would be required to prove the truth of every one of the plethora of allegations *and* that Ms. Maxwell knew each one of the allegations was true. Conversely, if there are at least two allegations that plaintiff cannot prove to be true or if there was good reason for Ms. Maxwell to believe at least two of the allegations to be false, then summary judgment should enter against plaintiff.

There are at least two allegations by plaintiff against Ms. Maxwell that are untrue. In the CVRA joinder motion, plaintiff alleged that in plaintiff’s first encounter with Mr. Epstein, Ms. Maxwell took her to Mr. Epstein’s bedroom for a massage that Mr. Epstein and Ms. Maxwell “turned . . . into a sexual encounter,” Doc.542-4, Ex.D, at 3. This allegation contradicted her allegation in the Sharon Churcher article that a woman *other than* Ms. Maxwell

²¹Ms. Maxwell said in her deposition she “know[s]” plaintiff is a “liar.” This testimony, plaintiff argues, “contradict[s]” our contention that the three sentences in the January 2015 statement are opinion. Resp. 39-40. Plaintiff’s argument is a *non-sequitur*. Ms. Maxwell’s 2016 deposition testimony in which she disclosed all the reasons she believes plaintiff has uttered a plethora of false allegations is wholly irrelevant to whether the three sentences in the January 2015 statement, prepared by Mr. Barden to respond to the joint-motion allegations, are opinions.

took her to Mr. Epstein's bedroom; during the massage *that* woman gave instructions to plaintiff, and the massage "quickly developed into a sexual encounter." Doc.542-1, Ex.A, at 4.

A second allegation pertaining to plaintiff's entire story about Ms. Maxwell's introduction of plaintiff to Prince Andrew is untrue. In the joinder motion, plaintiff alleged Ms. Maxwell served an "important . . . role" in "Epstein's sexual abuse ring," namely, connecting Mr. Epstein to "powerful individuals" who would sexually abuse plaintiff. *Id.*, Ex.D, at 5. Plaintiff alleged that in this role Ms. Maxwell introduced plaintiff to Prince Andrew, and she was "forced to have sexual relations with this Prince in three separate geographical locations," including Ms. Maxwell's London apartment. *Id.*, Ex.D, at 5. These allegations directly contradicted her earlier allegations in the 2011 Churcher article that (a) there never was "any sexual contact between [plaintiff] and [Prince] Andrew," and (b) Prince Andrew did not know "Epstein paid her to have sex with [Epstein's] friends." *Id.*, Ex.A, at 6.

Mr. Barden on behalf of Ms. Maxwell said in the first sentence that plaintiff's "allegations"—plural—against Ms. Maxwell are "untrue." We have just established through plaintiff's own contradictory words that it would be fair to characterize at least two of her allegations to be untrue. Having spent significant time with Ms. Churcher in 2011 and having substantial incentive to disclose all important details of her "sex abuse" story, *see* Menninger Decl. EXHIBIT OO, plaintiff in 2011 presented a story that exculpated Ms. Maxwell and Prince Andrew of the very misconduct that in 2015—after securing a lawyer and seeing her story as a profit vehicle—she inculpated them for. In the face of her contradictory allegations, plaintiff cannot possibly prove by clear and convincing evidence that all her joinder-motion allegations are true, or that when Ms. Maxwell said they were untrue, she knew each one of the allegations was true or that she recklessly disregarded whether each one was true.

Under New York law, a defendant's allegedly defamatory statement is held "to a standard of substantial, not literal, accuracy." *Law Firm of Daniel P. Foster*, 844 F.2d at 959. Here, Ms. Maxwell's first sentence *literally* is true: more than one of plaintiff's allegations are "untrue." Accordingly, there is no defamation.

Sentence No. 2. The second sentence at issue in this action states, "The original allegations are not new and have been fully responded to and shown to be untrue." Plaintiff alleges the sentence is defamatory to the extent it asserts the original allegations were "shown to be untrue." Doc.1 ¶ 30. Plaintiff cannot prove this statement's falsity.

It is a matter of pure opinion whether any given allegation was "shown" to be untrue. Some people require more proof than others to conclude that a fact has been "shown to be untrue." We discussed above various examples of this, e.g., climate change. Here, Ms. Maxwell via Mr. Barden in March 2011 issued a statement denying plaintiff's Churcher-story allegations as "all entirely false." Doc.542-3, Ex.C. Plaintiff did not respond to this statement, let alone claim it was defamatory. Her non-response reasonably could be seen as a concession that Ms. Maxwell's denial was righteous. *See* Doc.542-7, Ex.K (Mr. Barden: "I would have been remiss if I had sat back and not issued a denial, and the press had published that Ms. Maxwell had not responded to enquiries and had not denied the new allegations; the public might have taken the silence as an admission there was some truth in the in allegations.").

Regardless, we easily can show two of plaintiff's original allegations are untrue. Many of plaintiff's original allegations are contained in the two Churcher articles, Docs.542-1 & 542-2, Exs.A & B. The articles contained numerous allegations by plaintiff relating to her alleged sexual abuse. In her deposition, plaintiff was shown Deposition Exhibit 7, a collection of some of her allegations in the articles. Plaintiff placed checkmarks by those allegations she admitted—over the course of 20 pages of testimony—were not true. *See* Menninger Decl. EXHIBIT PP, at

435:7-455:6 & Depo. Ex.7. These include her claims that: (1) she was 17 when she flew to the Caribbean with Mr. Epstein and Ms. Maxwell “went to pick up Bill in a huge black helicopter,” referring to former President Bill Clinton; (2) her conversation with Mr. Clinton about Ms. Maxwell’s pilot skills; and (3) Donald Trump was a “good friend” of Mr. Epstein’s and “flirted with me”.

Plaintiff’s admissions on the falsity of her original allegations are fatal to her defamation claim as to the second sentence. The eleven admittedly false “original allegations” axiomatically would warrant the second sentence. Plaintiff has no possible way to prove the second sentence is false. Indeed, like Ms. Maxwell’s first sentence, the second sentence literally is true: more than one of plaintiff’s original allegations are untrue. A statement that literally is true cannot be defamatory as a matter of law. *See Law Firm of Daniel P. Foster*, 844 F.2d at 959.

Sentence No. 3. Defamation as to the third sentence is foreclosed. To begin with, as discussed above, whether plaintiff has uttered “obvious lies” is a matter of opinion: in the face of plaintiff’s gratuitous and lurid allegations of Ms. Maxwell’s years-long participation at the center of a child sex-trafficking ring, for the journalists-recipients of the July 2015 statement the phrase was an anticipated “epithet[, fiery rhetoric or hyperbole,” *Steinhilber*, 501 N.E.2d at 556 (internal quotations omitted); *see Tel. Sys. Int’l*, 2003 WL 22232908, at *2 (observing Court’s previous holding in *Rizzuto* that defendants’ use of phrases “conned,” “rip off” and “lying” in advertisements were not actionable as libel and were “rhetorical hyperbole, a vigorous epithet used by those who considered themselves unfairly treated and sought to bring what they alleged were the true facts to the readers”) (internal quotations omitted).

Even if *arguendo* the third sentence—plaintiff’s “claims are obvious lies”—cannot be considered opinion, the Rule 56 record forecloses a defamation claim. The sentence does not specify which of plaintiff’s “claims,” i.e., allegations, are obvious lies. It could refer to the

“original” claims; the “new,” CVRA claims; the claims against Ms. Maxwell; the claims against anyone, including Professor Dershowitz, who was mentioned in the preceding sentence; or any two or more of all the claims plaintiff ever had made about her alleged experiences as the alleged victim of a child sex-trafficking ring.

Regardless of what is being referred to, there is no defamation. As demonstrated in the discussion above of the first and second sentences, the Rule 56 record establishes that at least two of plaintiff’s “original” allegations are untrue, at least two of her CVRA allegations are untrue, at least two of her allegations against Ms. Maxwell are untrue, at least two of her allegations against anyone (e.g., Ms. Maxwell, Prince Andrew or Professor Dershowitz) are untrue, and at least two of her allegations about her alleged sex-trafficking experiences are untrue. Moreover, the untruthfulness—the falsity—of the allegations certainly is “obvious.” After all, plaintiff herself admitted under oath that a multitude of her original allegations are untrue, and she implicitly admitted some of her CVRA allegations are untrue because they were contradicted by her original allegations.

CONCLUSION

The Court should grant summary judgment in favor of Ms. Maxwell.

February 10, 2017.

Respectfully submitted,

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**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____ /

**PLAINTIFFS' RESPONSE TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

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I. PRELIMINARY STATEMENT

There can be no question that disputed issues of material facts preclude granting summary judgment when, in a one-count defamation case, Defendant presents the Court with a 68-page memorandum of law, a 16-page statement of purported facts, and approximately 700 pages of exhibits. The sheer scope of Defendant's response, if anything, conclusively demonstrates that volumes of disputed facts surround the core question of whether Defendant abused Ms. Giuffre. Indeed, Defendant acknowledges a dispute between the parties as to whether she abused Ms. Giuffre. *See, e.g.*, Motion for Summary Judgment at 1; Motion to Dismiss at 1. This Court already said that this disputed factual question is central to this case:

Either Plaintiff is telling the truth about her story and Defendant's involvement, or defendant is telling the truth and she was not involved in the trafficking and ultimate abuse of Plaintiff. The answer depends on facts. Defendant's statements are therefore actionable as defamation. Whether they ultimately prove to meet the standards of defamation (including but not limited to falsity) *is a matter for the fact-finder.*

Order Denying Defendant's Motion to Dismiss at 10. While this fact remains in dispute, summary judgment is foreclosed.

But even turning to Defendant's claims, the avalanche of aspersions she casts upon Ms. Giuffre and her counsel should not distract the Court from the fact that the instant motion cannot come within sight of meeting the standard for an award of summary judgment. The most glaring and emblematic example of the Defendant's far-fetched claims appears in her attempt to move away from her defamatory statement by arguing that it was her attorney and not her, who issued the defamatory statement for the press to publish, though she is forced to admit the statement was made on her behalf. This is an untenable position to take at trial, and an impossible argument to advance at the summary judgment stage, as both the testimonial and documentary evidence positively refute that argument. Defendant incorrectly asks this Court to make a factual

finding that her defamatory press release was actually a legal opinion, issued not by her, but by her lawyer, to the media, despite documentary evidence showing otherwise.

Defendant also argues that she has proven the truth of her statement calling Ms. Giuffre a liar with respect to the statements Ms. Giuffre made about Defendant. To the contrary, voluminous evidence, both documentary and testimonial from numerous witnesses, corroborate Ms. Giuffre's account of Defendant's involvement in the sexual abuse and trafficking of Ms. Giuffre. Just to briefly highlight a few, Johanna Sjoberg, testified that Defendant recruited her under the guise of a legitimate assistant position, but asked her to perform sexual massages for Epstein, and punished her when she didn't cause Epstein to orgasm.¹ Tony Figueroa testified that Defendant contacted him to recruit high school-aged girls for Epstein, and also testified that Maxwell and Epstein participated in multiple threesomes with Virginia Giuffre. Even more shockingly, the butler for Defendant's close friend witnessed, first-hand, a fifteen-year-old Swedish girl crying and shaking because Defendant was attempting to force her to have sex with Epstein and she refused. This is a fraction of the testimony that will be elicited at trial about Defendant's involvement in the sexual abuse and trafficking of Ms. Giuffre.

Defendant's primary argument in support of her contention that she did not abuse and traffic Ms. Giuffre as a minor child is that employment records show that Ms. Giuffre was either sixteen or seventeen when Defendant recruited her from her job at Mar-a-Lago for sex with Epstein, not fifteen-years-old as Plaintiff originally thought. Call this the "yes-I'm-a-sex-trafficker-but-only-of-sixteen-year-old-girls" defense. Defendant does not explain why sexual abuse of a fifteen year old differs in any material way from sexual abuse of a sixteen or seventeen year old. All instances involve a minor child, who cannot consent, and who is

¹See McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 8:5-10; 13:1-3; 12:17-14:3; 15:1-5; 32:9-16; 34:5-35:1; 36:2-1.

protected by federal and state laws. The fact remains that Defendant recruited Ms. Giuffre while she was a minor child for sexual purposes and then proceeded to take her all over the world on convicted pedophile Jeffrey Epstein's private jet, the "Lolita Express,"² as well as to his various residences, and even to her own London house. Flight logs even reveal twenty-three flights that Defendant shared with Ms. Giuffre – although Defendant claims she is unable to remember even a single one of those flights. Inconsequential details that Ms. Giuffre may have originally remembered incorrectly do not render her substantive claims of abuse by Defendant false, much less deliberate "lies." At most, these minor inaccuracies, in the context of a child suffering from a troubled childhood and sexual abuse, create nothing more than a fact question on whether Defendant's statement that Ms. Giuffre lied when she accused Defendant of abuse is "substantially true," thereby precluding summary judgment. *See Mitre Sports Int'l Ltd. v. Home Box Office, Inc.*, 22 F. Supp. 3d 240, 255 (S.D.N.Y. 2014) ("Because determining whether COI is substantially true would require this court to decide disputed facts ... summary judgment is not appropriate").

Defendant has tried to spin these inconsequential mistakes of memory into talismanic significance and evidence of some form of bad-faith litigation, but this claim fails under the weight of the evidence. As the Court knows, the clear weight of the evidence establishes Defendant's heavy and extensive involvement in both Jeffrey Epstein's sex trafficking ring and in recruiting Ms. Giuffre, living with her and Jeffrey Epstein in the same homes while Ms. Giuffre was a minor, and traveling with Ms. Giuffre and Jeffrey Epstein – including 23 documented flights. Even the house staff testified that Defendant and Ms. Giuffre were regularly

² See, e.g.: "All aboard the 'Lolita Express': Flight logs reveal the many trips Bill Clinton and Alan Dershowitz took on pedophile Jeffrey Epstein's private jet with anonymous women" at The Daily Mail, <http://www.dailymail.co.uk/news/article-2922773/Newly-released-flight-logs-reveal-time-trips-Bill-Clinton-Harvard-law-professor-Alan-Dershowitz-took-pedophile-Jeffrey-Epstein-s-Lolita-Express-private-jet-anonymous-women.html>.

together. *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 103:4-9 (“Q. After that day, do you recall that she started coming to the house more frequently. A. Yes, she did. Q. In fact, did she start coming to the house approximately three times a week? A. Yes, probably.”). It is also undisputed that witnesses deposed in this case have testified about Defendant’s role as a procurer of underage girls and young women for Jeffrey Epstein. At the very least, a trier of fact should determine whether the evidence establishes whether or not Ms. Giuffre’s claims of Defendant being involved in her trafficking and abuse are true. Defendant’s summary judgment motion should be denied in its entirety.

II. UNDISPUTED FACTS

The record evidence in this case shows that Defendant shared a household with convicted pedophile Jeffrey Epstein for many years. While there, she actively took part in recruiting underage girls and young women for sex with Epstein, as well as scheduling the girls to come over, and maintaining a list of the girls and their phone numbers. Ms. Giuffre was indisputably a minor when Defendant recruited her to have sex with convicted pedophile Jeffrey Epstein. Thereafter, Ms. Giuffre flew on Epstein’s private jets – the – Lolita Express” – with Defendant at least 23 times.

A. **It is an Undisputed Fact That Multiple Witnesses Deposed in This Case Have Testified That Defendant Operated as Convicted Pedophile Jeffrey Epstein’s Procurer of Underage Girls.**

1. **It is an undisputed fact that Joanna Sjoberg testified Defendant lured her from her school to have sex with Epstein under the guise of hiring her for a job answering phones.**

Ms. Sjoberg’s account of her experiences with Defendant are chillingly similar. As with Ms. Giuffre, Defendant, a perfect stranger, approached Ms. Sjoberg while trolling Ms. Sjoberg’s school grounds. She lured Ms. Sjoberg into her and Epstein’s home under the guise of a legitimate job of answering phones, a pretext that lasted only a day. A young college student,

nearly 2,000 miles from home, Defendant soon instructed Ms. Sjoberg to massage Epstein, and made it clear that Sjoberg's purpose was to bring Epstein to orgasm during these massages so that Defendant did not have to do it.

Q. And when did you first meet Ms. Maxwell?

A. 2001. March probably. End of February/beginning of March.

Q. And how did you meet her?

A. She approached me while I was on campus at Palm Beach Atlantic College.

Q. And how long did you work in that position answering phones and doing --

A. Just that one day.

Q. And what happened that second time you came to the house?

A. At that point, I met Emmy Taylor, and she took me up to Jeffrey's bathroom and he was present. And her and I both massaged Jeffrey. She was showing me how to massage. And then she -- he took -- he got off the table, she got on the table. She took off her clothes, got on the table, and then he was showing me moves that he liked. And then I took my clothes off. They asked me to get on the table so I could feel it. Then they both massaged me.

Q. Who did Emmy work for?

2 A. Ghislaine.

3 Q. Did Maxwell ever refer to Emmy by any particular term?

5 A. She called her her slave.

Q. Did Jeffrey ever tell you why he received so many massages from so many different girls?

A. He explained to me that, in his opinion, he needed to have three orgasms a day. It was biological, like eating.

Q. Was there anything you were supposed to do in order to get the camera?

THE WITNESS: I did not know that there were expectations of me to get the camera until after. She [Defendant] had purchased the camera for me, and I was over there giving Jeffrey a massage. I did not know that she was in possession of the camera until later. She told me -- called me after I had left and said, I have the camera for you, but you cannot receive it yet because **you came here and didn't finish your job and I had to finish it for you.**

Q. And did you -- what did you understand her to mean?

A. She was implying that I did not get Jeffrey off, and so she had to do it.

Q. And when you say "get Jeffrey off," do you mean bring him to orgasm?

A. Yes.

Q. Based on what you knew, did Maxwell know that the type of massages Jeffrey was getting typically involved sexual acts?

THE WITNESS: Yes.

Q. What was Maxwell's main job with respect to Jeffrey?

THE WITNESS: Well, beyond companionship, her job, as it related to me, was to find other girls that would perform massages for him and herself.³

Ms. Sjoberg also testified about sexual acts that occurred with her, Prince Andrew, and Ms. Giuffre, when she and Defendant were staying at Epstein's Manhattan mansion:

Q. Tell me how it came to be that there was a picture taken.

THE WITNESS: I just remember someone suggesting a photo, and they told us to go get on the couch. And so Andrew and Virginia sat on the couch, and they put the puppet, the puppet on her lap. And so then I sat on Andrew's lap, and I believe on my own volition, and they took the puppet's hands and put it on Virginia's breast, and so Andrew put his on mine.⁴

Ms. Sjoberg's testimony corroborates Ms. Giuffre's account of how Defendant recruited her (and others) under a ruse of a legitimate job in order to bring them into the household to have sex with Epstein. Ms. Sjoberg's testimony also corroborates Ms. Giuffre's account of being lent out to Prince Andrew by Defendant, as even the interaction Ms. Sjoberg witnessed included a sexual act: Prince Andrew using a puppet to touch Ms. Giuffre's breast while using a hand to touch Ms. Sjoberg's breast.

2. **It is an undisputed fact that Tony Figueroa testified that Defendant would call him to bring over underage girls and that Defendant and Epstein would have threesomes with Ms. Giuffre.**⁵

Tony Figueroa testified that Plaintiff told him about threesomes Ms. Giuffre had with Defendant and Epstein which included the use of strap-ons:

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

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

Q. She and Ms. Maxwell and Mr. Epstein would use strap-ons?

A. Uh-huh (affirmative).

³ See McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 8:5-10; 13:1-3; 12:17-14:3; 15:1-5; 32:9-16; 34:5-35:1; 36:2-15.

⁴ See McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 82:23-83:9.

⁵ Defendant attempts to discredit Figueroa's damaging testimony by repeatedly mentioning that he has been convicted for a drug-related offense. Unsurprisingly, in this attack, Defendant does not mention that she has a DUI conviction. See McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 390:13-15. (April 22, 2016).

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

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

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

A. And him, yeah.

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

A. Yeah. She said that she did.

Q. And what did she describe having happened?

A. I believe I already told you that. With the strap-ons and dildos and everything.⁶

[REDACTED]

[REDACTED]⁷

Figueroa also testified that Defendant called him to ask if he had found any other girls for Epstein, thereby acting as procurer of girls for Epstein:

Q. [W]hen Ghislaine Maxwell would call you during the time that you were living with Virginia, she would ask you what, specifically?

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

Q. Okay.

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

Q. Okay. Well, tell me. When did Ms. Maxwell ask you to bring a girl?

A. Never in person. It was, like, literally, like, on the phone maybe, like, once or twice.

Q. All right. Did Ms. Maxwell call you frequently?

A. No.

Q. All right. How many times do you think Ms. Maxwell called you, at all?

A. I'd just say that probably a just a few, a couple of times. Maybe once or twice.

Q. One or two --

A. The majority of the time it was pretty much his assistant.

Q. How do you know Ms. Maxwell's voice?

A. Because she sounds British.

Q. So someone with a British accent called you once or twice and asked for --

A. Well, she told me who she was.

Q. Okay. And what did she say when she called you and asked you to bring girls?

A. She just said, "Hi. This is Ghislaine. Jeffrey was wondering if you had anybody that could come over."⁸

⁶ See McCawley Dec. at Exhibit 4, Figueroa June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103.

⁷ See McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 55:19-58:23 (July 22, 2016).

⁸ See McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 200:6-18; 228:23-229:21.

3. **It is an undisputed fact that Rinaldo Rizzo testified that Defendant took the passport of a 15-year-old Swedish girl and threatened her when she refused to have sex with Epstein.**

Rinaldo Rizzo was the house manager for one of Defendant's close friends, Eva Dubin. Mr. Rizzo testified - through tears - how, while working at Dubin's house, he observed Defendant bring a 15 year old Swedish girl to Dubin's house. In distress, the 15 year old girl tearfully explained to him that Defendant tried to force her to have sex with Epstein through threats and stealing her passport:

Q. How old was this girl?

A. 15 years old.

Q. Describe for me what the girl looked like, including her demeanor and anything else you remember about her when she walks into the kitchen.

A. Very attractive, beautiful young girl. Makeup, very put together, casual dress. But she seemed to be upset, maybe distraught, and she was shaking, and as she sat down, she sat down and sat in the stool exactly the way the girls that I mentioned to you sat at Jeffrey's house, with no expression and with their head down. But we could tell that she was very nervous.

Q. What do you mean by distraught and shaking, what do you mean by that?

A. Shaking, I mean literally quivering.

Q. What did she say?

A. She proceeds to tell my wife and I that, and this is not -- this is blurting out, not a conversation like I'm having a casual conversation. That quickly, I was on an island, I was on the island and there was Ghislaine, there was Sarah, she said they asked me for sex, I said no. And she is just rambling, and I'm like what, and she said -- I asked her, I said what? And she says yes, I was on the island, I don't know how I got from the island to here. Last afternoon or in the afternoon I was on the island and now I'm here. And I said do you have a -- this is not making any sense to me, and I said this is nuts, do you have a passport, do you have a phone? And she says no, and she says Ghislaine took my passport. And I said what, and she says Sarah took her passport and her phone and gave it to Ghislaine Maxwell, and at that point she said that she was threatened. And I said threatened, she says yes, I was threatened by Ghislaine not to discuss this. And I'm just shocked. So the conversation, and she is just rambling on and on, again, like I said, how she got here, she doesn't know how she got here. Again, I asked her, did you contact your parents and she says no. At that point, she says I'm not supposed to talk about this. I said, but I said: How did you get here. I don't understand. We were totally lost for words. And she said that before she got there, she was threatened again by Jeffrey and Ghislaine not to talk about what I had mentioned earlier, about -- again, the word she used was sex.

Q. And during this time that you're saying she is rambling, is her demeanor continues to be what you described it?

A. Yes.

Q. Was she in fear?

A. Yes.

Q. You could tell?

A. Yes.

A. She was shaking uncontrollably.⁹

4. It is an undisputed fact that Lyn Miller testified that she believed Defendant became Ms. Giuffre's "new mama".

Lyn Miller is Ms. Giuffre's mother. She testified that when Ms. Giuffre started living with Defendant, Defendant became Ms. Giuffre's "new momma."¹⁰ Incredulously, Defendant testified that she barely remembered Ms. Giuffre.¹¹

5. It is an undisputed Fact that Detective Joseph Recarey testified that he sought to investigate Defendant in relation to his investigation of Jeffrey Epstein.

Detective Recarey led the Palm Beach Police's investigation of Epstein. He testified that Defendant procured girls for Epstein, and that he sought to question her in relation to his investigation, but could not contact her due to the interference of Epstein's lawyer:

Q. A cross-reference of Jeffrey Epstein's residence revealed which affiliated names?

A. It revealed Nadia Marcinkova, Ghislane Maxwell, Mark Epstein. Also, the cross-reference, any previous reports from the residence as well.

Q. During your investigation, did you learn of any involvement that Nadia Marcinkova had with any of the activities you were investigating?

Q. The other name that is on here as a cross-reference is Ghislane Maxwell. Did you speak with Ghislane Maxwell?

A. I did not.

Q. Did you ever attempt to speak with Ghislane Maxwell?

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

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

⁹ See McCawley Dec. at Exhibit 14, Rinaldo Rizzo's June 10, 2016 Dep. Tr. at 52:6-7; 52:25-53:17; 55:23-58:5

¹⁰ See McCawley Dec. at Exhibit 12, Lynn Miller's May 24, 2016 Dep. Tr. at 115.

¹¹ See McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 77:25-78:15 (April 22, 2016).

THE WITNESS: Ms. Maxwell, during her research, was found to be Epstein's long-time friend. During the interviews, Ms. Maxwell was involved in seeking girls to perform massages and work at Epstein's home.¹²

6. **It is an undisputed fact that Pilot David Rodgers testified that he flew Defendant and Ms. Giuffre at least 23 times on Epstein's jet, the "Lolita Express" and that "GM" on the flight logs Stands for Ghislaine Maxwell.**

Notably, at Defendant's deposition, Defendant refused to admit that she flew with Ms. Giuffre, and denied that she appeared on Epstein's pilot's flight logs.¹³ However, David Rodgers, Epstein pilot, testified that the passenger listed on his flight logs bearing the initials – GM – was, in fact, Ghislaine Maxwell, and that he was the pilot on at least 23 flights in which Defendant flew with Plaintiff.¹⁴ The dates of those flights show that Ms. Giuffre was an underage child on many of them when she flew with Defendant.¹⁵

7. **It is an undisputed fact that Sarah Kellen, Nadia Marcinkova, and Jeffrey Epstein invoked the Fifth Amendment when asked about Defendant trafficking girls for Jeffery Epstein.**

Both Sarah Kellen and Nadia Marcinkova lived with Jeffrey Epstein for many years. They both invoked the Fifth Amendment when asked about Defendant's participation in recruiting underage girls for sex with Epstein. Marcinkova testified as follows:

Q. Did Ghislaine Maxwell work as a recruiter of young girls for Jeffrey Epstein when you met her?

A. Same answer. [Invocation of Fifth Amendment]

Q. Have you observed Ghislaine Maxwell and Jeffrey Epstein convert what started as a massage with these young girls into something sexual?

A. Same answer.¹⁶

¹² See McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 27:10-17; 28:21-29:20.

¹³ See McCawley Dec. at Exhibit 11, Maxwell's April 22, 2016 Dep. Tr. at 78-79, 144.

¹⁴ See McCawley Decl. at Exhibit 41, Rodgers Dep. Ex. 1, GIUFFRE 007055-007161 (flight records evidencing Defendant (GM) flying with Ms. Giuffre).

¹⁵ See McCawley Dec. at Exhibit 15, David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36; *see also* Exhibit 41, Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570 and 1589.

¹⁶ See McCawley Dec. at Exhibit 10, Marcinkova Dep. Tr. at 10:18-21; 12:11-15.

Kellen testified as follows:

Q. Did Ghislaine Maxwell work as a recruiter for young girls for Jeffrey Epstein when you met her?

A. On advice of my counsel I must invoke my Fifth and Sixth Amendment privilege . . .

Q. Isn't it true that Ghislaine Maxwell would recruit underage girls for sex and sex acts with Jeffrey Epstein?

A. On advice of my counsel I must invoke my Fifth and Sixth Amendment privilege . . .¹⁷

Similarly, Jeffrey Epstein invoked the Fifth Amendment when asked about Defendant's involvement in procuring underage girls for sex with him.

Q. Maxwell was one of the main women whom you used to procure underage girls for sexual activities, true?

THE WITNESS: Fifth.

Q. Maxwell was a primary co-conspirator in your sexual abuse scheme, true?

THE WITNESS: Fifth.

Q. Maxwell was a primary co-conspirator in your sex trafficking scheme, true?

THE WITNESS: Fifth.

Q. Maxwell herself regularly participated in your sexual exploitation of minors, true?

THE WITNESS: Fifth.¹⁸

8. It is an undisputed fact that Juan Alessi testified that Defendant was one of the people who procured some of the over 100 girls he witnessed visit Epstein, and that he had to clean Defendant's sex toys.

Juan Alessi was Epstein's house manager. He testified as follows:

Q. And over the course of that 10-year period of time while Ms. Maxwell was at the house, do you have an approximation as to the number of different females – females that you were told were massage therapists that came to house?

A. I cannot give you a number, but I would say probably over 100 in my stay there.

Q. I don't think I asked the right – the question that I was looking to ask, so let me go back. Did you go out looking for the girls –

A. No.

Q. – to bring –

A. Never

Q. – as the massage therapists?

A. Never.

Q. Who did?

¹⁷ See McCawley Dec. at Exhibit 8, Kellen Dep. Tr. at 15:13-18; 20:12-16.

¹⁸ See McCawley Dec. at Exhibit 3, Epstein Dep. Tr. at 116:10-15; 117:18-118:10.

A. Ms. Maxwell, Mr. Epstein and their friends, because their friend relay to other friends they knew a massage therapist and they would send to the house. So it was referrals.

Q. Did you have occasion to clean up after the massages?

A. Yes.

Q. Okay. And that is after both a massage for Jeffrey Epstein, as well as clean up after a massage that Ghislaine Maxwell may have received?

A. Yes.

Q. And on occasion, after -- in cleaning up after a massage of Jeffrey Epstein or Ghislaine Maxwell, did you have occasion to find vibrators or sex toys that would be left out?

A. yes, I did.¹⁹

9. It is an undisputed fact that Defendant was unable to garner a single witness throughout discovery who can testify that she did not act as the procurer of underage girls and young women for Jeffrey Epstein.

Defendant has not been able to procure a single witness - not one – to testify that Defendant did not procure girls for sex with Epstein or participate in the sex. Even one of her own witnesses, Tony Figueroa, testified that she both procured girls and participated in the sex. Another one of Defendant's witnesses, Ms. Giuffre's mother, named Defendant as Ms. Giuffre's "new mamma." Indeed, those who knew her well, who spent considerable time with her in Epstein's shared household, like Juan Alessi, Alfredo Rodriguez and Joanna Sjoberg, have testified that she was Epstein's procuress. Others who lived with her – Jeffrey Epstein, Nadia Marcinkova, and Sarah Kellen – invoked the Fifth Amendment so as not to answer questions on the same. No one has testified to the contrary.

B. Documentary Evidence also Shows that Defendant Trafficked Ms. Giuffre and Procured her for Sex with Convicted Pedophile Jeffrey Epstein while She Was Underage.

1. The Flight Logs

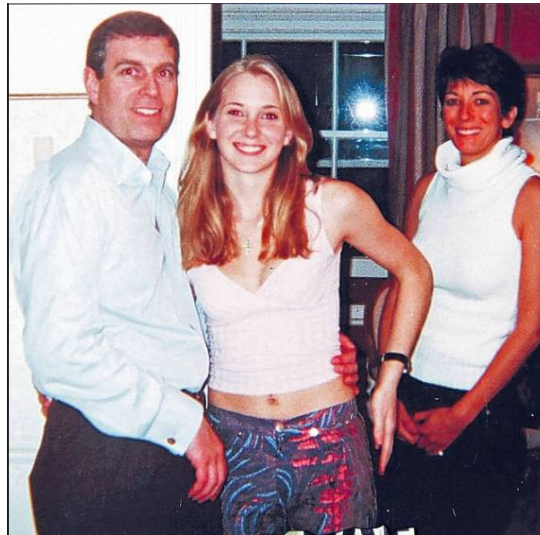
Defendant has never offered a legal explanation for what she was doing with, and why she was traveling with, a minor child on 21 flights while she was a child, including 6 international flights, aboard a convicted pedophile's private jet all over the world. Her motion for

¹⁹ See McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 28:6-15; 30:51-25; 52:9-22.

summary judgment – as well as all previous briefing papers – are absolutely silent on those damning documents.

2. The Photographs

Throughout a mountain of briefing and, and even in her own deposition testimony, Defendant never offered an explanation regarding Ms. Giuffre's photographs of her, Defendant, and Epstein. She never offered a legal explanation for why Prince Andrew was photographed with his hand around Ms. Giuffre's bare waist while she was a minor child, while posing with Defendant, inside Defendant's house in London. This particular photograph corroborates Ms. Giuffre's claims, and there is no other reasonable explanation why an American child should be in the company of adults not her kin, in the London house owned by the girlfriend of a now-convicted sex offender.²⁰



Ms. Giuffre also produced pictures of herself taken when she was in New York with Defendant and Epstein, and from a trip to Europe with Defendant and Epstein.²¹

²⁰ See McCawley Dec at Exhibit 42, GIUFFRE007167, Prince Andrew and Defendant Photo.

²¹ See McCawley Dec at Exhibit 42, GIUFFRE007182 - 007166.



And, Ms. Giuffre has produced a number of pictures of herself taken at the Zorro Ranch, Epstein's New Mexico Ranch, two of which are below.²²



Finally, among other nude photos, which included full nudes of Defendant, Ms. Giuffre produced images of females that the Palm Beach Police confiscated during the execution of the

²² See McCawley Dec at Exhibit 42, GIUFFRE007175; 007173.

warrant, including one photograph revealing the bare bottom of a girl who appears to be pre-pubescent (Ms. Giuffre will only submit its redacted form).²³



3. The Victim Identification Letter

In 2008, the United States Attorney's office for the Southern District of Florida identified Ms. Giuffre as a protected "victim" of Jeffrey Epstein's sex abuse. The U.S. Attorney mailed Ms. Giuffre a notice of her rights as a crime victim under the CVRA.²⁴

Re: Jeffrey Epstein/ NOTIFICATION OF
IDENTIFIED VICTIM

Dear :

By virtue of this letter, the United States Attorney's Office for the Southern District of Florida provides you with the following notice because you are an identified victim of a federal offense.

4. New York Presbyterian Hospital Records

Ms. Giuffre has provided extensive medical records in this case, including medical records from the time when Defendant was sexually abusing and trafficking her. Ms. Giuffre produced records supporting her claim of being sexually abused in New York resulting in both

²³ See McCawley Dec at Exhibit 44, GIUFFRE007584.

²⁴ See McCawley Dec. at Exhibit 30, GIUFFRE 002216-002218, Victim Notification Letter.

Defendant and Epstein taking Plaintiff to New York Presbyterian Hospital in New York while she was a minor.²⁵ The dates on the hospital records show she was seventeen years old.

5. Judith Lightfoot Psychological Records

As the Court is aware, Defendant propounded wildly overbroad requests for production concerning the past eighteen years of Ms. Giuffre's medical history. Defendant repeatedly and vehemently argued to the Court that it was essential to procure every page of these records in a fanfare of unnecessary motion practice. *See, e.g.*, Defendant's Motion to Compel (DE 75); Defendant's Motion for Sanctions at 10 ("Ms. Maxwell has been severely prejudiced by Plaintiff's failure to provide the required identifying information and documents from her health care providers."). Ms. Giuffre and her counsel took on the considerable burden and significant expense of retrieving and producing over 250 pages of medical records from over 20 providers, spanning two continents and nearly two decades.

Now that those records have been collected, Defendant's 68 page motion makes no reference to a single medical record produced by Ms. Giuffre, nor a single provider, nor a single treatment, nor or a single medication prescribed. After Defendant's repeated motion practice stressing the essentiality of these records, this may surprise the Court. But not Ms. Giuffre. Defendant's requests unearthed documents that are highly unfavorable to Defendant that corroborate Ms. Giuffre's claims against her.

Years before this cause of action arose, Ms. Giuffre sought counseling from a psychologist for the trauma she continued to experience after being abused by Defendant and Epstein. A 2011 psychological treatment record, written by her treating psychologist, unambiguously describes Defendant as Ms. Giuffre's abuser:

²⁵ *See* McCawley Dec at Exhibit 33, GIUFFRE003259-003290.

. . . [Ms. Giuffre] was approached by Ghislaine Maxwell who said she could help her get a job as a massage therapist . . . seemed respectable . . . was shown how to massage, etc., Geoff [sic] Epstein. Told to undress and perform sexual acts on person. Miss Maxwell promised her \$200 a job.²⁶

Therefore, years before Defendant defamed her, Ms. Giuffre confided in her treating psychologist that Maxwell recruited her for sex with Epstein.

6. Message Pads

Detective Recarey, the lead investigator of the criminal investigation into Epstein and his associates' sex crimes, recovered carbon copies of hand-written messages taken by various staff, including Defendant, at Epstein's Palm Beach residence.²⁷ These were collected both from trash pulls from the residence and during the execution of the search warrant where the pads were found laying out in the open in the residence.²⁸ The search warrant was executed in 2005 and the message pads collected include messages recorded in 2004 and 2005. Numerous witnesses have described that these copies of collected messages accurately reflect those taken by various staff at the Palm Beach Epstein mansion between 2004 and 2005.²⁹

The messages raise a question of fact as to Maxwell's involvement in the sexual abuse of minors and are relevant to refute Maxwell's denial of any involvement with Epstein during relevant time periods, and, accordingly her denial of knowledge of certain events.

While there were hundreds of these messages recovered during the investigation, this small sample demonstrates the undeniable reality that there exists a genuine issue of material fact with respect to Defendant's involvement in and knowledge of the activities described by Giuffre which Maxwell has said we "untrue" and "obvious lies."

²⁶ See McCawley Dec. at Exhibit 38, Lightfoot Records, GIUFFRE005437.

²⁷ See McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 45:13-25; 97:9-98:8.

²⁸ See McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 25:12-21; 40:5-15; 41:16-23; 42:14-43:10; 45:13-25; *see also* search warrant video showing the pads openly displayed on the desk.

²⁹ See McCawley Dec. at Exhibit 21, 1, 16, 11, Rodriguez Dep. Tr. at 73:19-74:12; Alessi Dep. Tr. at 141:18-21; Sjoberg Dep. Tr. at 64:1-6; Maxwell Dep. Tr. at 147:23-148:3; 148:19-149:14.

This sampling reveals that Maxwell, “GM,” took messages at the residence, including from underage girls who were calling to schedule a time to come over to see Epstein. This demonstrates that Maxwell was at Epstein’s Palm Beach mansion in 2004 and 2005, incidentally a time period she has denied being around the house in her deposition. *See supra* GIUFFRE001412; 001435; 001449. The messages also reveal that multiple “girls” were leaving messages that were being taken and memorialized and left out in the open for anyone to see. Certain messages also make clear that a number of these “girls” were in school. In addition to taking messages herself (and the staff working under her direction taking these relevant messages), staff employees were taking and leaving messages for Defendant. This is evidence that Maxwell was in the house at relevant times, including times that she has now testified under oath that she was not there. Other messages demonstrate Epstein and Maxwell’s friends, including Jean Luc Brunel, leaving messages relating to underage females. The following is a small sampling of such messages:

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/17/05</u>		TIME <u>8:50</u> A.M. P.M.	
M. <u>[REDACTED]</u>			
OF <u>[REDACTED]</u>			
PHONE/ MOBILE <u>[REDACTED]</u>			
TELEPHONED	PLEASE CALL		
CAME TO SEE YOU	WILL CALL AGAIN		
WANTS TO SEE YOU	RUSH		
RETURNED YOUR CALL	SPECIAL ATTENTION		
MESSAGE <u>I left message</u>			
<u>for [REDACTED] to</u>			
<u>call him at 11:00 AM</u>			
<u>and [REDACTED]</u>			
<u>for 4:30 PM</u>			
SIGNED <u>T.</u>			

GIUFFRE001412 (SAO01092)

IMPORTANT MESSAGE			
FOR <u>SE</u>			
DATE <u>8/16/05</u>		TIME <u>2:26</u> A.M. P.M.	
M. <u>[REDACTED]</u>			
OF <u>[REDACTED]</u>			
PHONE <u>963 8470</u> AREA CODE NUMBER EXTENSION			
TELEPHONED	PLEASE CALL		
CAME TO SEE YOU	WILL CALL AGAIN		
WANTS TO SEE YOU	RUSH		
RETURNED YOUR CALL	SPECIAL ATTENTION		
MESSAGE <u>WANTS TO KNOW</u>			
<u>IF SHE SHOULD RING</u>			
<u>HER FRIEND [REDACTED]</u>			
<u>WILL TONIGHT</u>			
SAO01456			
SIGNED <u>M. [REDACTED]</u>			

GIUFFRE001427 (SAO01456)

IMPORTANT MESSAGE			
FOR <u>Teff. [REDACTED]</u>			
DATE <u>2/28/05</u>		TIME <u>12:32</u> A.M. P.M.	
M. <u>[REDACTED]</u>			
OF <u>[REDACTED]</u>			
PHONE/ MOBILE <u>[REDACTED]</u>			
TELEPHONED	PLEASE CALL		
CAME TO SEE YOU	WILL CALL AGAIN		
WANTS TO SEE YOU	RUSH		
RETURNED YOUR CALL	SPECIAL ATTENTION		
MESSAGE <u>SHE IS WORKING</u>			
<u>IF 2:30 is ok</u>			
<u>she can come to</u>			
<u>stay in school</u>			

GIUFFRE001388 (SAO01067)

IMPORTANT MESSAGE	
FOR	MR EPSTEIN
DATE	7/9/04 TIME 7:50 AM
M	[REDACTED]
OF	[REDACTED]
PHONE/MOBILE	[REDACTED]
TELEPHONED	PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: " [REDACTED] IS AVAILABLE ON TUESDAY NO ONE FOR TOMORROW"	
SAO01461	
SIGNED	R

GIUFFRE001432 (SAO01461)

IMPORTANT MESSAGE	
FOR	J.E.
DATE	8/26/05 TIME 8:50 AM
M	[REDACTED]
OF	[REDACTED]
PHONE/MOBILE	[REDACTED]
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: [REDACTED] - confirmed at 4 PM Who is scheduled for morning? The live [REDACTED] wants to work	
SAO01476	
SIGNED	J

GIUFFRE001448 (SAO01476)

IMPORTANT MESSAGE	
FOR	Jeffrey
DATE	TIME 5:11 AM
M	[REDACTED]
OF	[REDACTED]
PHONE/MOBILE	[REDACTED]
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: has girl for tonight	
SAO02828	
SIGNED	

GIUFFRE001452 (SAO02828)

IMPORTANT MESSAGE	
FOR	OF
DATE	5:14 AM
M	Joan Wic
OF	[REDACTED]
PHONE/MOBILE	[REDACTED]
TELEPHONED	PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: He just did a good one - 1/2 years - (he spoke to me & said "I love Jeffrey")	
SAO2832	
SIGNED	

GIUFFRE001456 (SAO2832)

IMPORTANT MESSAGE	
FOR	Jeffrey
DATE	6/1/05 TIME 8:08 AM
M	Jean-Luc
OF	[REDACTED]
PHONE/MOBILE	[REDACTED]
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: He has a teacher for you to teach you how to speak Russian. She is 2x8 years old not blonde lessons are free and you can have 1st today if you call	
SAO3008	
SIGNED	

GIUFFRE001563 (SAO3008)

IMPORTANT MESSAGE	
FOR	Jeffrey
DATE	TIME AM PM
M	Christiane
OF	[REDACTED]
PHONE/MOBILE	[REDACTED]
TELEPHONED	PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: would be helpful to have [REDACTED] come to Palm Beach today to stay here and help train new staff with Christiane	
SAO2830	
SIGNED	

GIUFFRE001454 (SAO02830)

IMPORTANT MESSAGE	
FOR	J.E.
DATE	1/29/05 TIME 1:10 AM
M	[REDACTED]
OF	[REDACTED]
PHONE/MOBILE	(561) [REDACTED]
TELEPHONED	PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: I have 2 female for him	
SAO01455	
SIGNED	R

GIUFFRE001426 (SAO01455)

IMPORTANT MESSAGE	
FOR	Mr J.E.
DATE	11/28/04 TIME 1:15 AM
M	[REDACTED]
OF	[REDACTED]
PHONE/MOBILE	(561) [REDACTED]
TELEPHONED	PLEASE CALL
CAME TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	RUSH
RETURNED YOUR CALL	SPECIAL ATTENTION
MESSAGE: I have 2 female for him	
SAO01452	
SIGNED	R

GIUFFRE001423 (SAO01452)

The following are descriptions of a sampling of messages pads³⁰ that create a genuine dispute of material fact:

- One message pad reflects [REDACTED], who is identified in the Palm Beach Police Report as a minor, contacting Jeffrey Epstein for “work” explaining that she does not have any money. The term “work” was often used by members of Jeffrey Epstein’s sexual trafficking ring to refer to sexual massages. (See GIUFFRE05660 (“She stated she was called by Sara for her to return to work for Epstein. [REDACTED] stated ‘work’ is the term used by Sarah to provide the massage in underwear.”). **Giuffre 001462: July 5th no year to JE from [REDACTED] ”I need work. I mean I don’t have money. Do you have some work for me?”**
- Other message pads reflect [REDACTED] who was a minor, calling and leaving a message at the Palm Beach mansion that she has recruited another girl for Jeffrey Epstein. The second message demonstrates that Jeffrey Epstein required different girls to be scheduled every day of the week. The third shows an offer to have two minor girls come to the home at the same time to provide sexual massages. These type of messages indicate the lack of secrecy of the fact that multiple young females were visiting every day and at least raises a question of fact whether Maxwell was knowledgeable and involved as Giuffre has said, or whether Giuffre was lying and Maxwell was not at all involved or aware of this activity, as Defendant would attempt to have the world believe.
Giuffre 001428 – undated Jeffrey From [REDACTED] – “Has girl for tonight” ;Giuffre 001432 (pictured above)– 7/9/04 – Mr. Epstein From [REDACTED] – “[REDACTED] is available on Tuesday no one for tomorrow”; GIUFFRE 001433 /1/17/04 – Mr. Epstein from [REDACTED] – “Me and [REDACTED] can come tomorrow any time or [REDACTED] alone” ; Giuffre – 001452 – undated Jeffrey from [REDACTED] “Has girl for tonight.”
- Other message pads demonstrate that there was a pattern and practice of using young females to recruit additional young females to provide sexual massages on a daily basis.
Giuffre 001413 (pictured above)– JE from “N” – “[REDACTED] hasn’t confirmed [REDACTED] for 11:00 yet, so she is keeping [REDACTED] on hold in case [REDACTED] doesn’t call back; Giuffre 001448 -8/20/05 JE from [REDACTED] - [REDACTED] confirmed [REDACTED] at 4 pm. Who is scheduled for morning? I believe [REDACTED] wants to work.”

This message pad reflects that a friend of Jeffrey Epstein is sending him a sixteen year old Russian girl for purposes of sex. **Giuffre 001563 (pictured above)- 6/1/05 For Jeffrey From Jean Luc “He has a teacher for you to teach you how to speak Russian. She is 2X8 years old not blonde. Lessons are free and you can have your 1st today if you call.”**

- This message pad directly refutes Maxwell’s sworn testimony that she was not present during the year 2005 at Jeffrey Epstein’s Palm Beach mansion because this shows [REDACTED] leaving a message for Jeffrey at the Palm Beach home that she was going to work out

³⁰ See McCawley Dec. at Exhibit 28.

with the Defendant on September 10, 2005. The police were only able to retrieve a fraction of these message pads during their trash pull but even in the few they recovered, it shows Maxwell was regularly at the Palm Beach home during the time period she claimed she was not. To the contrary, she was both sending and receiving messages and messages, like this one, reflect her presence at the mansion. **Giuffre 001412 – 9/10/05 (during the year Maxwell says she was never around) JE from [REDACTED] – “I went to Sarah and made her water bottle and I went to work out with GM.”**

- These message pads further corroborate that Defendant lied in her testimony and she was in fact in regular contact with Jeffrey Epstein during the years 2004 and 2005. For example, the message from “Larry” demonstrates that Defendant is at the Palm Beach mansion so frequently that people, including Epstein’s main pilot Larry Visoski, are leaving messages for Maxwell at the Palm Beach house. **Giuffre 001435 7/25/04 – Mr. Epstein from Ms. Maxwell – “tell him to call me”; Giuffre – 001449 – 8/22/05 – JE from GM; Giuffre – 001453 – 4/25/04 for Ms. Maxwell From Larry “returning your call”;**
- This message pad shows that Defendant was clearly actively involved in Jeffrey Epstein’s life and the activities at his Palm Beach mansion. **Giuffre – 001454 – undated Jeffrey From Ghislaine – “Would be helpful to have _____ come to Palm Beach today to stay here and help train new staff with Ghislaine.”**
- This message pad clearly reflects an underage female (noted by the police redaction of the name) leaving a message asking if she can come to the house at a later time because she needs to “stay in school.” **Giuffre 001417 (pictured above)– Jeffrey 2/28/05 Redacted name “She is wondering if 2:30 is o.k. She needs to stay in school.”**
- This message pad reflects a message from [REDACTED] who was under the age of eighteen at the time she was going over to Jeffrey Epstein’s home to provide sexual massages according to the Palm Beach Investigative Report. **Giuffre 001421 3/4/05 to Jeffrey from [REDACTED] “It is o.k. for [REDACTED] to stop by and drop something?”**
- These message pads reflect the pattern of underage girls (noted by the police redaction of the name on the message pad) calling the Palm Beach mansion to leave a message about sending a “female” over to provide a sexual massage. **Giuffre 001423 11/08/04 To Mr. JE – redacted from – “I have a female for him” Giuffre 001426 (pictured above) – 1/09/05 JE To JE from Redacted – “I have a female for him.”**
- This message pad reflects the pattern and practice of having young girls bring other young girls to the house to perform sexual massages. Indeed the “[REDACTED]” reflected in this message pad corresponds in name to the [REDACTED] that Tony Figueroa testified he initially brought to Jeffrey Epstein during the time period that the Defendant was requesting that Tony find some young females to bring to Jeffrey Epstein’s home. *See* Figueroa at 184-185. The Palm Beach Police Report reflects that “[REDACTED]” and “[REDACTED]” also brought seventeen year old [REDACTED] to the home to perform sexual massages. *See* GIUFFRE 05641. [REDACTED] thereafter recruited a number of other young girls to perform sexual

messages as reflected in the Palm Beach Police Report. **Giuffre 001427 (pictured above) – 1/2/03 – JE from [REDACTED] “Wants to know if she should bring her friend [REDACTED] with tonight.”**

- This message pad reflects multiple sexual massages being scheduled for the same day which corroborates Virginia GIUFFRE, [REDACTED] and Johanna Sjorberg’s testimony that Jeffrey Epstein required that he have multiple orgasms in a day which occurred during these sexual massages. **Giuffre 001449 (pictured above) – 9/03/05 JE from [REDACTED] – “I left message for [REDACTED] to confirm for 11:00 a.m. and [REDACTED] for 4:30 p.m.”**
- This message pad shows a friend of Jeffrey Epstein’s discussing with him how he had sex with an 18 year old who had also been with Jeffrey Epstein. **Giuffre – 001456 (pictured above)– undated JE from Jean Luc – “He just did a good one – 18 years – she spoke to me and said “I love Jeffrey.”**

Law enforcement was able to confirm identities of underage victims through the use of the names and telephone numbers in these message pads:

Q. The next line down is what I wanted to focus on, April 5th, 2005. This trash pull, what evidence is yielded from this particular trash pull?

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

Q. And when you would -- when you would see females’ names and telephone numbers, would you take those telephone numbers and match it to -- to a person?

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

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

THE WITNESS: Correct.

Q. Did you find names of other witnesses and people that you knew to have been associated with the house in those message pads?

THE WITNESS: Yes.

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

THE WITNESS: It was very important to corroborate what the victims had already told me as to calling in and for work.³¹

7. The Black Book

Palm Beach Police confiscated an extensive lists of contacts with their phone numbers from Defendant and Epstein’s residence.³² Ghislaine Maxwell maintained a contact list in an

³¹ See McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 42:14-43:17; 78:25:-79:15.

approximately 100-page-long hard copy, which was openly available to other house employees. It consisted primarily of telephone numbers, addresses, or email addresses for various personal friends, associates, employees, or personal or business connections of Epstein or Defendant. Prior to being terminated by Defendant, the Palm Beach house butler Alfredo Rodriguez printed a copy of this document and ultimately provided it to the FBI. This document reflects the numerous phone numbers of Defendant, Epstein as well as staff phone numbers. Additionally, and importantly, there are several sections entitled “Massage” alongside a geographical designation with names of females and corresponding telephone numbers. These numbers included those of underage females (with no training in massage therapy) – including [REDACTED] [REDACTED] – identified during the criminal investigation of Epstein. This document is an authentic reflection of the people who were associated with Epstein, Defendant, and the management of their properties, and the knowledge each had of the contents of the document.

8. Sex Slave Amazon.com Book Receipt

Detective Recarey authenticated an Amazon.com receipt that the Palm Beach Police collected from Jeffrey Epstein’s trash. The books he ordered are titled:

- (1) SM 101: A Realistic Introduction, Wiseman, Jay;
- (2) SlaveCraft: Roadmaps for Erotic Servitude – Principles, Skills and Tools by Guy Baldwin; and
- (3) Training with Miss Abernathy: A Workbook for Erotic Slaves and Their Owners, by Christina Abernathy, as shown below:

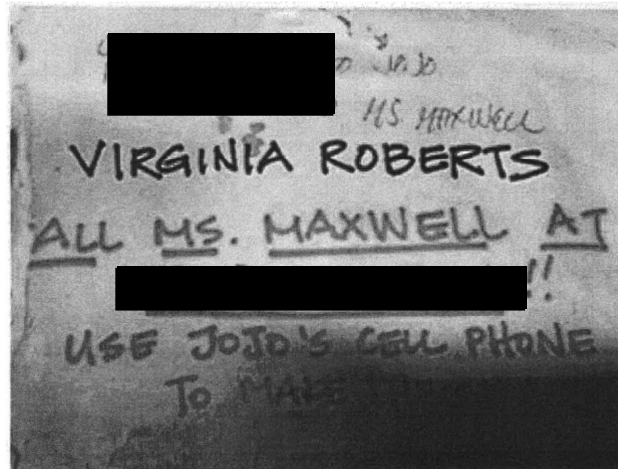
³² See McCawley Dec. at Exhibit 45, Phone List, Public Records Request No.: 16-268 at 2282 – 2288.



This disturbing 2005 purchase corroborate Ms. Giuffre's account of being sexually exploited by Defendant and Epstein – not to mention the dozens of underage girls in the Palm Beach Police Report. Additionally, Defendant testified that she was not with Jeffrey Epstein in 2005 and 2006 when he was ordering books on how to use sex slaves; however, record evidence contradicts that testimony.

9. Thailand Folder with Defendant's Phone Number

Defendant also was integral in arranging to have Virginia go to Thailand. While Epstein had paid for a massage therapy session in Thailand, there was a catch. Defendant told Virginia she had to meet young girls in Thailand and bring her back to the U.S. for Epstein and Defendant. Indeed, on the travel records and tickets Defendant gave to Virginia, Defendant wrote on the back the name of the girl Virginia was supposed to meet, and she was also instructed to check in frequently with Defendant as it was further signified by the words "Call Ms. Maxwell (917) [REDACTED]!" on Virginia's travel documents. In this case, Virginia also produced the hard copy records from her hotel stay in Thailand paid for by Epstein. *See* McCawley Dec. at Exhibit 32, 43, GIUFFRE 003191-003192; GIUFFRE 007411-007432.



10. It is undisputed fact that the FBI report and the Churcher emails reference Ms. Giuffre's accounts of sexual activity with Prince Andrew that she made in 2011, contrary to Defendant's argument that Ms. Giuffre never made such claims until 2014.

Based on the FBI's Interview of Ms. Giuffre in 2011, they wrote a report reflecting Ms.

Giuffre's claims concerning her sexual encounters with Prince Andrew.³³

GIUFFRE and [REDACTED] went shopping and purchased makeup, clothing, and a Burberry bag. The items were purchased with [REDACTED] GIUFFRE and [REDACTED] returned [REDACTED] at [REDACTED]. [REDACTED] instructed GIUFFRE to get ready. When GIUFFRE came down after getting ready, she was introduced to [REDACTED].

[REDACTED]

[REDACTED] GIUFFRE traveled to CLUB TRAMP [REDACTED] GIUFFRE danced [REDACTED] at CLUB TRAMP [REDACTED]

[REDACTED] stayed at CLUB TRAMP for an hour or hour and a half and drank a couple of cocktails before returning to [REDACTED] GIUFFRE had not received any direction from [REDACTED]

[REDACTED] After returning to [REDACTED] GIUFFRE requested [REDACTED] to take a photograph of her [REDACTED] GIUFFRE advised that she still had the original photograph in her possession and would provide it to the interviewing agents. GIUFFRE proceeded with [REDACTED]

[REDACTED]

Approximately two months later, GIUFFRE met [REDACTED] at [REDACTED]

[REDACTED] GIUFFRE recalled [REDACTED] LNU, [REDACTED]

[REDACTED]

[REDACTED] GIUFFRE recalled [REDACTED] joking about trading GIUFFRE in because she was getting too old.

³³ See McCawley Dec. at Exhibit 31, GIUFFRE001235-1246, FBI Redacted 302.

Additionally, 2011 correspondence with Sharon Churcher shows that Ms. Giuffre disclosed her sexual encounters with Prince Andrew, but Churcher had to check with the publisher's lawyers "on how much can be published,"

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Friday, 18 February 2011 7:25 AM
To: Virginia Giuffre

Hi there
Have been up all night writing. Won't have an opinion from our lawyer on how much can be published until London wakes up. The lawyers wanted internal FBI documents but I think the Justice Dept letter is all you have from the feds??? Anyway can I give you a call early afternoon? Maybe have a late lunch?
S

See McCawley Dec. at Exhibit 34, GIUFFRE003678. Accordingly, there is documentary evidence that refutes Defendant's meritless argument that Ms. Giuffre did not allege she had sex with Prince Andrew until 2014. To the contrary, two sources, including the FBI, show Ms. Giuffre made these claims in 2011.

C. Defendant Has Produced No Documents Whatsoever That Tend to Show That She Did Not Procure Underage Girls For Jeffrey Epstein.

Defendant has produced no documents that even tend to show that she did not procure underage girls for sex with Epstein, and no documents that tend to show that she did not participate in the abuse. Indeed, Defendant refused to produce *any* documents dated prior to 2009, which includes the 2000-2002 period during which she abused Ms. Giuffre.

Against this backdrop of an avalanche of evidence showing the Defendant sexually trafficked Ms. Giuffre, summary judgment on any of the issues advanced by Defendant is inappropriate. While we discuss the particulars of the individual claims below, the larger picture is important too. Ms. Giuffre will prove at trial that Epstein and Defendant sexually trafficked her. And yet, when Ms. Giuffre had the courage to come forward and expose what Defendant had done to world – in a Court pleading trying to hold Epstein accountable – Defendant

responded by calling her a liar in a press release intended for worldwide publication. Such heinous conduct is not a mere “opinion,” but rather is defamation executed deliberately and with actual malice. The jury should hear all of the evidence and then render its verdict on Ms. Giuffre’s complaint.

III. LEGAL STANDARD

Rule 56 of the Federal Rules of Civil Procedure provides that a motion for summary judgment may be granted only when “there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.” The Second Circuit has repeatedly held that “all ambiguities and inferences to be drawn from the underlying facts should be resolved in favor of the party opposing the motion, and all doubts as to the existence of a genuine issue for trial should be resolved against the moving party.” *Swan Brewery Co. Ltd. v. U.S. Trust Co. of New York*, 832 F. Supp. 714, 717 (S.D.N.Y. 1993) (Sweet, J.), citing *Brady v. Town of Colchester*, 863 F.2d 205, 210 (2d Cir. 1988) (internal quotations omitted). In other words, in deciding a motion for summary judgment, the court must construe the evidence in the light most favorable to the non-moving party and draw all reasonable inferences in the non-moving party’s favor. *In re “Agent Orange” Prod. Liab. Litig.*, 517 F.3d 76, 87 (2d Cir. 2008). *Stern v. Cosby*, 645 F. Supp. 2d 258, 269 (S.D.N.Y.2009). Summary judgment should be denied “if the evidence is such that a reasonable jury could return a verdict” in favor of the non-moving party. *See Net Jets Aviation, Inc. v. LHC Commc’ns, LLC*, 537 F.3d 168, 178–79 (2d Cir. 2008).

IV. LEGAL ARGUMENT

A. Defendant is Liable for the Publication of the Defamatory Statement and Damages for Its Publication

Defendant’s lead argument is that, when she issued a press release attacking Ms. Giuffre to members of the media, she somehow is not responsible when the media quickly published her

attacks. If accepted, this remarkable claim would eviscerate defamation law, as it would permit a defamer to send defamatory statements to the media and then stand back and watch – immune from liability – when (as in this case) the defamatory statements are published around the world. This absurd position is not the law, particularly given that the Defendant released a statement to media asking them to “[p]lease find attached a *quotable statement* on behalf of Ms. Maxwell.”

To make her claim seem plausible, Defendant cites older cases, some dating back as far as 1906. This presents a distorted picture of the case law on these issues. As a leading authority on defamation explains with regard to liability for republication by another of statement by a defendant: “Two standards have evolved. The older one is that the person making the defamatory statement is liable for republication only if it occurs with his or her express or implied authorization or consent. The more modern formulation adds responsibility for all republication that can reasonably be anticipated or that is the ‘natural and probable consequence’ of the publication.” SACK ON DEFAMATION § 2.7.2 at 2-113 to 2-114 (4th ed. 2016). In this case, however, the nuances of the applicable legal standards make little difference because Defendant so clearly authorized – indeed, desired and did everything possible to obtain – publication of her defamatory statements attacking Ms. Giuffre.

1. **Under New York Law, Defendant is liable for the media’s publication of her press release.**

Given the obvious purposes of defamation law, New York law unsurprisingly assigns liability to individuals for the media’s publication of press releases. Indeed, New York appellate courts have repeatedly held that an individual is liable for the media publishing that individual’s defamatory press release. *See Levy v. Smith*, 18 N.Y.S.3d 438, 439, 132 A.D.3d 961, 962–63 (N.Y.A.D. 2 Dept. 2015) (“Generally, [o]ne who makes a defamatory statement is not responsible for its recommunication without his authority or request by another over whom he

has no control . . . Here, however . . . the appellant intended and authorized the republication of the allegedly defamatory content of the press releases in the news articles”); *National Puerto Rican Day Parade, Inc. v. Casa Publications, Inc.*, 914 N.Y.S.2d 120, 123, 79 A.D.3d 592, 595 (N.Y.A.D. 1 Dept. 2010) (affirming the refusal to dismiss defamation counts against a defendant who “submitted an open letter that was published in [a] newspaper, and that [the defendant] paid to have the open letter published,” and finding that the defendant “authorized [the newspaper] to recommunicate his statements.”) *See also* RESTATEMENT (SECOND) OF TORTS § 576 (1977) (“The publication of a libel or slander is a legal cause of any special harm resulting from its repetition by a third person if . . . the repetition was authorized or intended by the original defamer, or . . . the repetition was reasonably to be expected.”)³⁴

Defendant deliberately sent her defamatory statement to major news media publishers for worldwide circulation because Defendant wanted the public at large to believe that Ms. Giuffre was lying about her abuse. Defendant even hired a public relations media specialist to ensure the media would publish her statement. Her efforts succeeded: her public relations agent instructed dozens of media outlets to publish her “quotable” defamatory statement and they did.

Despite this deliberate campaign to widely publicize her defamatory statement, Defendant now disclaims any responsibility for the media publishing her press release. If we understand Defendant’s position correctly, because she somehow lacked “control” over what major newspapers and other media finally put in their stories, she escapes liability for defamation. This nonsensical position would let a defamer send a false and defamatory letter to major media, and then, when they published the accusation, escape any liability. Such an

³⁴*Cf.*, *Eliah v. Ucatan Corp.*, 433 F. Supp. 309, 312–13 (W.D.N.Y. 1977) (“The alleged multistate publication of plaintiff’s photograph without her consent thus gives rise to a single cause of action. . . . However, evidence of the multistate publication of the magazine and the number of copies sold would be competent and pertinent to a showing of damages, if any, suffered by plaintiff.”)

argument is not only an affront to logic, but it is contrary to prevailing New York case law, cited above. Perhaps even more important, in the context of the pending summary judgment motion, it would require Defendant to convince the jury that she did not “authorize or intend” for the major media to publish her press release. Obviously the disputed facts on this point are legion, and summary judgment is accordingly inappropriate.

Even the cases Defendant cites contradict her argument. She first cites *Geraci v. Probst*, in which a defendant sent a letter to the Board of Fire Commissioners, and, years later, a newspaper published the letter. The court held that the defendant was not liable for that belated publication, “made years later without his knowledge or participation.” *Id.*, at 340. By contrast, Defendant not only authorized the defamatory statement, but paid money to her publicist to convince media outlets to publish it promptly – actions taken with both her knowledge and consent. Defendant’s statement was thus not published “without [her] authority or request,” as in *Geraci*, but by her express authority and by her express request. Defendant’s publicist’s testimony and the documents produced by Defendant’s publicist unambiguously establish that the media published her press release with Defendant’s authority and by her request:

Q. When you sent that email were you acting pursuant to Ms. Maxwell’s retention of your services?

A. Yes, I was

Q. The subject line does have “FW” which to me indicates it’s a forward. Do you know where the rest of this email chain is?

A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, “Okay, Ghislaine, I’ll go with this.”

It is my understanding that this is the agreed statement because the subject of the second one is “Urgent, this is the statement” so ***I take that as an instruction to send it out, as a positive command***: “This is the statement.”³⁵

³⁵ See McCawley Dec. at Exhibit 6, Ross Gow Dep. Tr. at 14:15-17; 44:6-45:13 (emphasis added).

Similarly, another case cited by Defendant, *Davis v. Costa-Gavras*, involved a libel claim against a book author who wrote an account of the 1972 military coup in Chile. Years later, the plaintiff attempted to ascribe defamation liability to a third-party publishing house's decision to republish the book in paperback form and a third-party filmmaker who released a movie based on the book. The Court held that a "party who is 'innocent of all complicity' in the publication of a libel cannot be held accountable . . . [but that] a deliberate decision to republish or active participation in implementing the republication resurrects the liability." 580 F. Supp. 1082, 1094 (S.D.N.Y. 1984). Here, Defendant made a deliberate decision to publish her press release, and actively participated in that process. At the very least, the jury must make a determination of whether Defendant was "innocent of all complicity" for a libelous statement contained in her press release.

Finally, Defendant cites *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557 (1980), which held that reporters of a series of articles on narcotics trade "cannot be held personally liable for injuries arising from its subsequent republication in book form absent a showing that they approved or participated in some other manner in the activities of the third-party republisher." *Id.*, 416 N.E.2d at 559-560. Again, the jury could reasonably find that Defendant both approved of, and even participated in, the media's publication of her press release. Indeed, it is hard to understand how any jury could find anything else. Defendant was obviously "active" in influencing the media to publish her defamatory press release, she both "approved" of and pushed for the publication of the press release. Accordingly, she is liable for its publication.³⁶

³⁶ On page 14 of her motion, Defendant makes wholly contradictory statements. In back-to-back sentences, she tells the Court that (1) she has no control over whether the media published the statement she sent to the media (with instructions to publish it by an influential publicist); (2) her public relations representative gave instructions to the media on how to publish it (in full); and (3) her public relations representative "made no effort to control" how the media would publish it. Indeed, the best evidence of Defendant's control over the press is the fact dozens of media outlets obeyed her directive to publish her defamatory statement.

Therefore, disclaiming responsibility for the media's publication of a statement (for which she hired a publicist for the purpose of influencing the media to publish that statement) is contrary to both prevailing case law, and the cases cited by Defendant.

2. Defendant is liable for the media's publication of the defamatory statement.

After arguing, contrary to New York law, that she is not liable for the media's publication of her own press release, Defendant next argues that she is not liable for the media's publications of the *defamatory statement* contained within her press release if the media chose to make even the tiniest of editorial changes. If we understand Defendant's argument correctly, any omission of any language from a press release is somehow a "selective, partial" publication for which she escapes liability. Mot. at 14. Once again, this claim is absurd on its face. It would mean that a defamer could send to the media a long attack on a victim with one irrelevant sentence and, when the media quite predictably cut that sentence, escape liability for the attack. Moreover, even on its face, the claim presents a jury question of what changes would be, in context, viewed as "selective" or "partial" publications – something that only a jury could determine after hearing all of the evidence.

In support of this meritless argument, Defendant cites *Rand v. New York Times Co.*, for the proposition that a defendant cannot be liable for a publisher's "editing and excerpting of her statement." 430 N.Y.S.2d 271, 274, 75 A.D.2d 417, 422 (N.Y.A.D. 1980). This argument fails for several reasons. First, there is no "republication" by the media as a matter of law. Defendant issued a defamatory statement to the press, and its publication (as Defendant intended) is not a "republication" under the law, as discussed above. Second, there was no "editing" or paraphrasing or taking the quote out of context of the core defamatory statement in the press release: that Ms. Giuffre is a liar. The "obvious lies" passage is the heart of the message

Defendant sent to the press: that Ms. Giuffre was lying about her past sexual abuse. Even in isolation, Defendant's quote stating that Ms. Giuffre's claims are "obvious lies" does not distort or misrepresent the message Defendant intended to convey to the public that Ms. Giuffre was lying about her claims. As this Court explained in denying Defendant's Motion to Dismiss, this case "involves statements that explicitly claim the sexual assault allegations are false." *Giuffre v. Maxwell*, 165 F. Supp. 3d 147, 152 (S.D.N.Y. 2016).

Furthermore, the facts at issue here make the *Rand* holding inapposite. In *Rand*, a newspaper paraphrased and "sanitized" defendant's words. No such changing, sanitizing, or paraphrasing occurred in the instant case: the media **quoted** Defendant's statement accurately. Further, the phrase at issue in *Rand* was that certain people "screwed" another person. The speaker/newspaper used the term "screwed" in reference to a record label's dealings with a performing artist, and not did not mean "screwed" in the literal sense, but as "rhetorical hyperbole, and as such, is not to be taken literally." *Id.* By contrast, there is no hyperbole in Defendant's defamatory statement, and it was never distorted or paraphrased by any publication known to Ms. Giuffre. A jury could reasonably conclude that Defendant's statement that Ms. Giuffre's claims of child sexual abuse are "obvious lies" is not a rhetorical device, nor hyperbole, but a literal and particular affirmation that Ms. Giuffre lied.

Accordingly, there is no support in the factual record that the media reporting that Defendant stated that Ms. Giuffre's claims of childhood sexual abuse are "obvious lies" is a distortion of Defendant's message or hyperbole. Even a cursory review of the press release would lead to that conclusion. Moreover, to the extent that there is any dispute that Defendant's statement had a different meaning outside of the context of the remainder of the press release,

such a determination of meaning and interpretation is a question of fact for the jury to decide, and is inappropriate for a determination upon summary judgment.

B. Material Issues of Fact Preclude Summary Judgment.

1. The Barden Declaration presents disputed issues of fact.

The primary basis of Defendant's motion for summary judgment is her attorney's self-serving, *post hoc* affidavit wherein he sets forth his alleged "intent" with regard Defendant's defamatory statement.³⁷ Ms. Giuffre disputes Defendant's attorney's alleged and unproven "intent" (not to mention Defendant's "intent"), not only because Defendant refuses to turn over her attorney's communications, but also because questions of intent are questions of fact to be determined by a trier of fact. Furthermore, ample record evidence contradicts the claimed "intent."

a. The Barden Declaration is a deceptive back-door attempt to inject Barden's advice without providing discovery of all attorney communications.

In her brief, Defendant discloses her attorney's alleged legal strategy and alleged legal advice; however, she deliberately states that her attorney "intended," instead of her attorney "advised," when discussing her attorney's legal strategy and advice, using that phrase *at least 37 times*,³⁸ and using phrases such as Barden's "beliefs,"³⁹ "purposes,"⁴⁰ "goals,"⁴¹ and

³⁷ The Barden declaration is problematic for other reasons as well. In addition to Defendant's over-length, 68-page motion and among Defendant's 654 pages of exhibits lies an eight-page attorney affidavit that proffers legal conclusions and arguments. This exhibit is yet another improper attempt to circumvent this Court's rules on page limits. See *Pacenza v. IBM Corp.*, 363 F. App'x 128, 130 (2d Cir. 2010) (affirming lower court decision to strike "documents submitted . . . in support of his summary judgment motion [that] included legal conclusions and arguments" because those "extraneous arguments constituted an attempt . . . to circumvent page-limit requirements submitted to the court."); cf. *HB v. Monroe Woodbury Cent. School Dist.*, 2012 WL 4477552, at *6 (S.D.N.Y. Sept. 27, 2012) ("The device of incorporating an affirmation into a brief by reference, as Plaintiffs have done here, in order to evade the twenty-five page limit, rather obviously defeats the purpose of the rule"). The court should disregard the Barden Declaration for that reason alone.

³⁸ MSJ at 7 (three times), 8 (three), 15 (four), 16, 25 (five), 26, 33, 35 (two), 36 (three); Statement of Facts at 6 (two), 7 (five); Decl. of Philip Barden at 4 (four), 5 (three).

³⁹ MSJ at 25, 35; Statement of Facts at 7 (two); Decl. of Philip Barden at 3, 4 (three), 5 (two).

⁴⁰ MSJ at 8, 25, 35; Statement of Facts at 7 (three); Decl. of Philip Barden at 4 (two), 5 (three).

“contemplations” 25 other times. All the while Defendant has claimed a privilege as to her communications with Barden. Defendant attempts to convince the Court that she only granted Gow permission to publish the defamatory statement as part of “Mr. Barden’s deliberated and carefully crafted” (MSJ at 16) legal strategy and advice. Yet, she still refused to turn over her communications with Barden under the auspices of attorney-client privilege.⁴² Such gamesmanship should not be permitted.

If the Court were to consider the Barden Declaration (which it shouldn’t), it would be ruling on a less than complete record because, based on this Declaration, it is necessary that Defendant disclose all communications with him and possibly others. Ms. Giuffre doesn’t have those communications, the court doesn’t have those communications; therefore, Defendant is asking for summary judgment on an incomplete record.

The Court should also not consider the Barden Declaration because it will be inadmissible as unduly prejudicial. It is a self-serving declaration by a non-deposed witness made without turning over the documents that are relevant to the declaration. *See, e.g., Rubens v. Mason*, 387 F.3d 183, 185 (2d Cir. 2004) (“We find that the District Court predicated its grant of summary judgment as to liability on an affidavit from the arbitrator who presided over the underlying arbitration, the probative value of which was substantially outweighed by the danger of unfair prejudice. The affidavit, therefore should not have been admitted. We therefore vacate the grant of summary judgment to the defendants on liability and remand to the District Court.”).

- b. Defendant’s summary judgment argument requires factual findings regarding Barden’s intent, thereby precluding summary judgment.

Even were the Court to consider this Declaration and representations therein – which it should not – the declaration itself demonstrates that the Court would have to make factual

⁴¹ MSJ at 27.

⁴² *See* McCawley Dec. at Exhibit 22, Defendant’s Privilege Log.

finding as to what Mr. Barden's intent really was. Finding about intent are inappropriate at the summary judgment stage, as this Court and the Second Circuit have recognized. This Court has explained, "*if it is necessary to resolve inferences regarding intent, summary judgment is not appropriate.*" *Id.* (Sweet, J.) (emphasis added), citing *Patrick v. Le Fevre*, 745 F.2d 153, 159 (2d Cir. 1984); *Friedman v. Meyers*, 482 F.2d 435, 439 (2d Cir. 1973) (other citations omitted).

c. There are factual disputes regarding Barden's Declaration.

Finally, there are material disputes over the statements in the Barden Declaration because they are directly refuted by record evidence. For example, the instant motion and the Barden Declaration describe the press release merely as a document expressing "his [Mr. Barden's] *opinion – in the form of a legal argument* – as a lawyer would be," as opposed to a press release for dissemination by the media to the public. Record evidence refutes this claim, as (1) the press release was sent to journalists, not media publishers or in-house counsel; (2) the press release instructed the journalists to publish the defamatory statement ("Please find attached a *quotable statement* on behalf of Ms. Maxwell"); (3) it was issued by a publicist on Defendant's behalf and not by an attorney, without any reference to attorneys or laws – indeed, Gow testified that Barden was unavailable to approve the statement; and (4) Gow testified that he issued the statement only after he understood Defendant to have "signed off" it, an understanding he formed based on Defendant's "positive command" to him: "This is the agreed statement."

Q. When you sent that email were you acting pursuant to Ms. Maxwell's retention of your services?

A. Yes, I was.

Q. When you say "agreed statement" can you tell me more about what you mean? **Who agreed to the statement?**

A. I need to give you some context, if I may, about that statement. So, this is on New Year's Day. I was in France so the email time here of 21:46, in French time was 22:46, and I was getting up early the next morning to drive my family back from the south of France to England, which is a 14-hour journey, door to door. So on the morning of the 2nd of January,

bearing in mind that Ms. Maxwell, I think was in New York then, she was five hours behind, so there was quite a lot of, sort of time difference between the various countries here, I sent her an email, I believe, saying - parsing this-- forwarding this email to her saying "How do you wish to proceed?" And then I was on the telephone-- I had two telephones in the car, I received in excess of 30 phone calls from various media outlets on the 2nd of January, all asking for information about how Ms. Maxwell was looking to respond to the latest court filings, which were filed on the 30th of December as I understand.

And by close-- towards close of play on the 2nd, **I received an email forwarded by Ms. Maxwell, containing a draft statement** which my understanding was the majority of which had been drafted by Mr. Barden **with a header along the lines of "This is the agreed statement."** At close of play on the 2nd. So--I was--I had gone under the Channel Tunnel and I was sitting on the other side and that email, which **my understanding was that it had been signed off by the client, effectively**, was then sent out to a number of media, including Mr. Ball and various other UK newspapers.

Q. Mr. Gow, when you say "end of play" and "close of play," are you referring to sending the email that is Exhibit 2?

A. Yes, I am

Q. The subject line does have "FW" which to me indicates it's a forward. Do you know where the rest of this email chain is?

A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so **this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, "Okay, Ghislaine, I'll go with this."**

It is my understanding that this is the agreed statement because the subject of the second one is "Urgent, this is the statement" so I take that as an instruction to send it out, as a positive command: "This is the statement."⁴³

Accordingly, record evidence shows that the press release was intended as press release, and not as a "legal argument." Record evidence also establishes that Defendant circulated the press release to Barden and Gow, and then gave a "positive command" to Gow to publish it. Additionally, there is no indicia that the press release is a legal opinion. To the contrary, it was issued by, and specifically attributed to, a woman who has personal knowledge of whether Ms. Giuffre's claims of sexual abuse are true, and she states that Ms. Giuffre is a liar.⁴⁴ At the very least, all of these factual issues must be considered by a jury.

⁴³ See McCawley Dec. at Exhibit 6, Ross Gow Dep. Tr. at 14:15-17; 31:19-33:7; 44:6-45:13 (emphasis added).

⁴⁴ Unsurprisingly, Defendant cites no case law to support her argument that her attorney's alleged influence in preparing the statement Defendant issued to the media somehow shields her from liability.

Another example is that Defendant states that “Gow served only as Mr. Barden’s conduit to the media” (MTD at 25), and “Mr. Barden was directing the January 2-15 statement to a discrete number of media representatives.” Barden wasn’t directing anything – he wasn’t even in the loop when Defendant decided to publish the statement - and the documents prove it. Indeed, the press release itself states that it is “on behalf of Ms. Maxwell,” not Barden, and it was Defendant who gave the “positive command” to Gow to publish it. These are just a couple of examples, among many, of the purported facts asserted in Defendant’s motion and Barden’s Declaration that are directly refuted by facts in the record.

Finally, neither the media nor the general public could have known that the statement should be attributed to Barden. His name was nowhere in it, nor is there any reference to counsel. Defendant’s argument that the “context” is the media knowing Barden’s intent or involvement is unsupported by the record. The significant factual disputes about Barden, alone, prevent summary judgment.

C. Defendant’s Defamatory Statement Was Not Opinion as a Matter of Law.

As this Court previously held, correctly, Defendant stating that Ms. Giuffre’s claims of sexual assault are lies is not an expression of opinion:

“First, statements that Giuffre’s claims ‘against [Defendant] are untrue,’ have been ‘shown to be untrue,’ and are ‘obvious lies’ have a specific and readily understood factual meaning: that Giuffre is not telling the truth about her history of sexual abuse and Defendant’s role, and that some verifiable investigation has occurred and come to a definitive conclusion proving that fact. Second, these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion. Third, in their full context, while Defendant’s statements have the effect of generally denying Plaintiff’s story, they also clearly constitute fact to the reader.”

Giuffre v. Maxwell, 165 F. Supp. 3d 147, 152 (S.D.N.Y. 2016). This Court further explained:

“Plaintiff cannot be making claims shown to be untrue that are obvious lies without being a liar. Furthermore, to suggest an individual is not telling the truth

about her history of having been sexually assaulted as a minor constitutes more than a general denial, it alleges something deeply disturbing about the character of an individual willing to be publicly dishonest about such a reprehensible crime. Defendant's statements clearly imply that the denials are based on facts separate and contradictory to those that Plaintiff has alleged." *Id.*

Defendant argues that somehow the "context" of the entire statement "tested against the understanding of the average reader" should be the press release as a whole being read only by journalists. This is an unreasonable construct because the ultimate audience for a press release is the public. Indeed, the purpose of a press release is to reach readers. Unsurprisingly, Defendant cites no case that holds that journalists might somehow believe statements of fact are opinion while others do not.

This Court has previously covered this ground when it clearly stated:

Sexual assault of a minor is a clear-cut issue; either transgression occurred or it did not. Either Maxwell was involved or she was not. The issue is not a matter of opinion, and there cannot be differing understandings of the same facts that justify diametrically opposed opinion as to whether Defendant was involved in Plaintiff's abuse as Plaintiff has claimed. Either Plaintiff is telling the truth about her story and Defendant's involvement, or Defendant is telling the truth and she was not involved in the trafficking and ultimate abuse of Plaintiff.

Giuffre v. Maxwell, 165 F. Supp. at 152 (S.D.N.Y. 2016). The same conclusion applies now. At the motion to dismiss stage, Defendant had not yet produced the statement she issued to the press. That statement is now in evidence, so there is no ambiguity as to what defendant released to the press.

The absurdity of Defendant characterizing his statements calling Ms. Giuffre a liar as mere "opinion" is revealed by the fact that Defendant was the one who was sexually trafficking and otherwise abusing Ms. Giuffre. No reasonable person in any context would construe that as Defendant's mere "opinion" on the subject, since Defendant knew she was abusing Ms. Giuffre. Indeed, this argument is contradicted by Defendant's own deposition testimony:

Q. Do you believe Jeffrey Epstein sexually abused minors?

A. I can only testify to what I know. **I know that Virginia is a liar and I know what she testified is a lie.** So I can only testify to what I know to be a falsehood and half those falsehoods are enormous and so **I can only categorically deny everything she has said** and that is the only thing I can talk about because I have no knowledge of anything else.

See McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. (April 17, 2016) at 174:6-19.

Defendant slyly contends in her motion that “Mr. Barden’s “arguments” in the press release constitute ‘pure opinion,’” attempting to disclaim any involvement in making the defamatory statement. However, it is not Mr. Barden’s statement, nor his opinion, that is at issue here. At issue here is Defendant’s statement – a statement attributable to her, that she approved, whose publication she “command[ed],” and for which she hired a public relations representative to disseminate to at least 30 journalists for publication. While Mr. Barden could possibly have had his own opinion as to whether or not his client abused Ms. Giuffre, Defendant cannot express an opinion on a binary, yes/no subject where she knows the truth. As this Court previously articulated, “statements that Giuffre’s claims ‘against [defendant] are untrue,’ have been ‘shown to be untrue,’ and are ‘obvious lies’ have a specific and readily understood factual meaning.” *Giuffre v. Maxwell*, 165 F. Supp. 3d at 152. Again, at the very least, the jury must pass on such issues.

D. The Pre-Litigation Privilege Does Not Apply to Defendant’s Press Release

1. Defendant fails to make a showing that the pre-litigation privilege applies.

Defendant’s next argument seeks refuge in the pre-litigation privilege. If we understand the argument correctly, Defendant seems to be saying that because she was contemplating an (unspecified and never-filed) lawsuit involving the British Press, she somehow had a “green light” to make whatever defamatory statements she wanted about Ms. Giuffre. To prove such a

remarkably claim, Defendant relies on caselaw involving such mundane topics as “cease and desist” letters sent to opposing parties and the like. Obviously such arguments have no application to the press release that Defendant sent out, worldwide, attacking Ms. Giuffre’s veracity.

The problems with the Defendant’s argument are legion. For starters, there is no record evidence – not even Defendant’s own testimony – suggesting that she was contemplating litigation against Ms. Giuffre, or that her press release was related to contemplated litigation against Ms. Giuffre. Tellingly, the only “evidence” Defendant cites of any alleged contemplated litigation is the self-serving, *post hoc*, partial waiver of attorney-client privilege found in the Barden Declaration. As discussed above, that Declaration fails to establish that there was good faith anticipated litigation between her and Ms. Giuffre, particularly when evidence in the record contradicts such assertions. At the very least, it is a matter of fact for the jury to decide.

In another case in which a defendant attempted to claim pre-litigation privilege applied to statements made to the press, this Court denied summary judgment, and held, “[t]o prevail on a qualified privilege defense [defendant] must show that his claim of privilege does not raise triable issues of fact that would defeat it.” *Block v. First Blood Associates*, 691 F. Supp. 685, 699-700 (Sweet, J.) (S.D.N.Y. 1988) (denying summary judgment on the pre-litigation qualified privilege affirmative defense because there was “a genuine issue as to malice and appropriate purpose”). Defendant’s claim here likewise fails.

First, Defendant’s testimony makes no mention of any contemplated lawsuit – much less, any contemplated lawsuit against Ms. Giuffre. Second, Defendant has offered no witnesses who will testify that she intended to bring any law suit. Third, she did not, in fact, bring any such lawsuit. The only “evidence” is a *post hoc* Declaration written by her attorney. Finally, it must be

remembered, as explained at length above, the Defendant had sexually trafficking Defendant and was attempting to continue to conceal her criminal acts. Whether her statements had an “appropriate purpose,” *Block* 691 F. Supp. at 699-700 (Sweet, J.) – or were, rather, efforts by a criminal organization to silence its victims – is obviously contested. Accordingly, obvious issues of fact exist as to whether or not Defendant contemplated litigation.

Distorting reality, Defendant further argues: “Statements pertinent to a good faith anticipated litigation made by attorneys (or their agents under their direction) before the commencement of litigation are privileged.” (MSJ at 33). The record evidence shows that Defendant’s attorney did not make the defamatory statement. Further, Defendant’s attorney’s agents did not make the defamatory statement. Defendant did. And, there was no statement made by anyone “before the commencement of litigation” because *litigation never commenced*. Accordingly, the cases Defendant cites where attorneys are making statements (or where clients are making statements to their attorneys regarding judicial proceedings including malpractice) are wholly inapposite as detailed below.⁴⁵

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- *Front v. Khalil*, 24 N.Y.3d 713, 720 (2015) - statement made by attorney.
- *Flomenhaft v. Finkelstein*, 127 A.D.3d 634, 637 n.2, 8 N.Y.S.3d 161 (N.Y. App. Div. 2015) - did not even address pre-litigation privilege, and said that *Front, Inc.* was not relevant to the case.
- *Kirk v. Heppt*, 532 F. Supp. 2d 586, 593 (S.D.N.Y. 2008) - the communication at issue was made by an attorney’s client to the attorney’s malpractice carrier concerning the client’s justiciable controversy against the attorney over which the clients actually sued.
- *Petrus v. Smith*, 91 A.D.2d 1190 (N.Y.A.D., 1983) - the court held: “[r]emarks of attorney to Surrogate are cloaked with absolute immunity as statements made in course of judicial proceedings – Attorney’s gratuitous opinion outside courthouse calling plaintiff liar . . . is not similarly immune.” (This case undermines the false argument Defendant tries to make).
- *Klien* - contrary to dicta quoted by Defendant from the *Klein* case, there were no communications made “between litigating parties or their attorneys,” just a press release Defendant instructed her press agent to disseminate to the media.
- *Frechtman v. Gutterman*, 115 A.D.3d 102, 103, 979 N.Y.S.2d 58, 61 (2014) - the communication at issue was a letter sent by a client to his attorney terminating the representation for malpractice.
- *Sexter & Warmflash, P.C. v. Margrave*, 38 A.D.3d 163 (N.Y.A.D. 1 Dept. 2007) - privilege applied to letter client sent discharging law firm as the client’s attorneys as statements relating to a judicial proceeding and law firm sued for defamation.

Similarly, in *Black v. Green Harbour Homeowners' Ass'n, Inc.*, 19 A.D.3d 962, 963, 798 N.Y.S.2d 753, 754 (2005), cited by Defendant, the Court held a privilege applied to a letter sent by a home owner's association board of directors to the association's members informing them of the status of litigation to which the association was a party, and to the association's letter to the state attorney general sent to discharge its duties to the association. In this case, litigation was actually pending, the communication was sent by a party to that litigation as part of its duties, and the communication itself concerned the litigation. Defendant's press release fits none of those descriptions.

Unsurprisingly, Defendant cites to no case in which a Court has held that this or any qualified privilege extends to internationally disseminated press releases defaming a non-party to the purported "anticipated" litigation. Regardless of whether or not Barden had a hand in drafting the statement (another disputed issue of fact for the jury), Defendant issued the statement, instructed that it be published, and the statement she issued was attributed to her, and not to her attorney (or his agents). Accordingly, all the case law Defendant cites about an *attorney* making a statement (or a client making a statement to their attorney or malpractice carrier) is inapposite.

2. Defendant is foreclosed from using the pre-litigation privilege because she acted with malice.

In any event, because Defendant acted with malice, she cannot avail herself of the pre-litigation privilege. As this Court has explained denying Defendant's motion to dismiss, "There is no qualified privilege under New York law when such statements are spoken with malice, knowledge of their falsity, or reckless disregard for their truth." *Giuffre v. Maxwell*, 165 F. Supp. 3d at 155 (citing *Block*, 691 F. Supp. at 699 (Sweet, J.) (S.D.N.Y. 1988)). There is ample record evidence that Defendant acted with malice in issuing the press release, thereby making the litigation privilege inapplicable. *See Block*, 691 F. Supp. at 700 (Sweet, J.) ("Here, sufficient

evidence has been adduced to support the inference that [defendant] acted with malice, and may not, therefore, claim a qualified privilege under New York law . . . a genuine issue as to malice and appropriate purpose has properly been raised and is sufficient to preclude summary judgment.”). For example, Ms. Sjoberg testified that Defendant recruited her for sex with Epstein, thus corroborating Ms. Giuffre’s own account of Defendant’s involvement in abusing her with Epstein. For another example, Jeffrey Epstein’s pilot testified that Defendant flew with Ms. Giuffre on at least 23 flights, thus corroborating Ms. Giuffre’s claims against Defendant. *See* McCawley Dec. at Exhibit 15, Rodgers Dep. Tr., at 34:3-10. For another example, Tony Figueroa testified that Defendant asked him for assistance in recruiting girls for Epstein – more testimony that corroborates Ms. Giuffre’s claims against Defendant.

Defendant’s statements that Ms. Giuffre was lying and her claims of sexual abuse were “obvious lies” were not pertinent to a good faith anticipated litigation but, instead, they were made for an inappropriate purpose – i.e., to bully, harass, intimidate, and ultimately silence Ms. Giuffre. As the record evidence shows, Defendant knew the statements were false because Defendant engaged in and facilitated the sexual abuse of this minor child, therefore, they were made for the inappropriate purpose of “bullying,” “harassment,” and “intimidation.” *See Front v. Khalil*, 24 N.Y.3d 713, 720 (2015). Simply put, Defendant sexually trafficked Ms. Giuffre – and then tried to silence Ms. Giuffre to keep her crimes secret – circumstances that prevent her from using privileges designed to shield legitimate legal disputes from court interference.

New York case law fully confirms that pre-litigation qualified privilege does not apply to this case. Historically, statements made in the course of litigation were entitled to privilege from defamations claims “so that those discharging a public function may speak freely to zealously represent their clients without fear of reprisal or financial hazard.” *Id.* at 718. A 2015 New York

Court of Appeals case somewhat extended this privilege by holding that statements made by attorneys prior to the commencement of the litigation are protected by a qualified privilege if those statements are pertinent to a good faith anticipated litigation. *Id.* at 718. (“Although it is well settled that statements made in the course of litigation are entitled to absolute privilege, the Court has not directly addressed whether statements made by an attorney on behalf of his or her client in connection with prospective litigation are privileged” . . . “to advance the goals of encouraging communication prior to the commencement of litigation” . . . “we hold that statements made prior to the commencement of an anticipated litigation are privileged, and that the privilege is lost where a defendant proves that the statements were not pertinent to a good faith anticipated litigation.”).

The Court of Appeals’ reason for allowing this qualified privilege could not be more clear: “When litigation is anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation. Attorneys often send cease and desist letters to avoid litigation. Applying privilege to such preliminary communication encourages potential defendants to negotiate with potential plaintiffs in order to prevent costly and time consuming judicial intervention.” *Id.* at 719-20. Under this rationale, the *Khalil* court found that an attorney’s letters to the potential defendant were privileged because they were sent “in an attempt to avoid litigation by requesting, among other things, that Khalil return the alleged stolen proprietary information and cease and desist his use of that information.” *Id.* at 720.

Here, quite unlike *Khalil*, the Defendant’s statements were (1) made by a non-attorney (Defendant through Gow); (2) concerning a non-party to any alleged anticipated litigation; (3) knowingly false statements; and (4) contained in a press release directed at, and disseminated to,

the public at large. Defendant's statements cannot be considered "pertinent to a good faith anticipated litigation," such that the qualified privilege should apply.

Finally, though it strains credulity to even entertain the prospect, if Defendant could make even colorable showings on these basic issues, it would remain an issue of fact for the jury to determine whether or not Defendant's press release, calling Ms. Giuffre's sex abuse claims "obvious lies," was any type of "cease-and-desist" statement or a statement that acted to "reduce or avoid" or resolve any "anticipated" litigation. Summary judgment is obviously inappropriate here as well.

3. Defendant cannot invoke the pre-litigation privilege because she has no "meritorious claim" for "good faith" litigation.

Finally, Defendant cannot prevail in asserting this qualified privilege because, in order to invoke this privilege, she must have "meritorious claims" for "good faith anticipated litigation." *Khalil* specifically states that for the qualified privilege to apply, the statements must be made "pertinent to a good faith anticipated litigation," and it does not protect attorneys . . . asserting wholly *unmeritorious claims*, unsupported in law and fact, in violation of counsel's ethical obligations." *Khalil*, 24 N.Y.3d at 718, 720 (emphasis added). Defendant has neither "meritorious claims" nor "good faith anticipated litigation." Defendant cannot have a "meritorious claim" for "good faith anticipated litigation" against the press (or Ms. Giuffre) because Ms. Giuffre's reports of her sexual abuse are true, Defendant knows that they are true, and Defendant made a knowingly false statement when she called Ms. Giuffre a liar. Under these circumstances, Defendant has no "meritorious" claim to make in "good faith" relating to either Ms. Giuffre's statements or their coverage in the press, thereby making her defamatory statements wholly outside the protection of this qualified privilege. At the very least, the issue of

whether Defendant has meritorious claims against the press on the grounds that she did not abuse Ms. Giuffre is a question of fact for the jury to decide.

V. DEFENDANT HAS NOT - AND CANNOT - SHOW THAT HER DEFAMATORY STATEMENT IS SUBSTANTIALLY TRUE

Defendant next claims that her press release calling Ms. Giuffre a liar about her past sex abuse was somehow “substantially true.” Here again, this is a highly disputed claim. On its face, to determine what is “substantially” true or not requires extensive fact finding, such as whether Defendant recruited Ms. Giuffre as a minor child for sex with Defendant’s live-in boyfriend and convicted pedophile, Jeffrey Epstein. Accordingly, summary judgment is not appropriate. *See Mitre Sports Intern. Ltd. v. Home Box Office, Inc.*, 22 F. Supp. 3d 240, 255 (S.D.N.Y.2014) (denying summary judgment because it would require the Court to decide disputed facts to determine whether the statement at issue was substantially true); *Da Silva v. Time Inc.*, 908 F. Supp. 184, 187 (S.D.N.Y. 1995) (denying motion for summary judgment because there was a genuine issue of material act as to whether defamatory photo and caption were not true, stating “[i]n the instant case Da Silva’s contention that she was a reformed prostitute at the time of photography and publication provides a rational basis upon which a fact-finder could conclude that the photograph was not substantially true”).

Additionally, Defendant has remarkably not submitted any evidence that she did not recruit Ms. Giuffre for sex with Epstein. Nor has Defendant offered any evidence that her role in Epstein’s household was not to recruit girls and young women for Jeffrey Epstein. Accordingly, summary judgment is inappropriate. *See Stern v. Cosby*, 645 F. Supp. 2d 258, 277 (S.D.N.Y. 2009) (because defendant had “not submitted any evidence to show that Statement 11 is substantially true, her motion for summary judgment as to Statement 11 is denied”).

Further, much of the purported evidence upon which Defendant relies to allege the truth of her defamatory statement is merely hearsay, including inadmissible hearsay statements made by Alan Dershowitz, who Defendant did not depose in this case (and whom Ms. Giuffre has not had an opportunity to cross examine). Hearsay cannot establish the truth of a defamatory statement as a matter of law at summary judgment. *Lopez v. Univision Communications, Inc.*, 45 F. Supp.2d 348, 359 (S.D.N.Y.1999) (denying summary judgment and holding “defendants’ evidence as to what they were told by representatives of NYU and Kean College, to the extent offered for the truth of the matters asserted, is inadmissible hearsay and an insufficient basis upon which to grant summary judgment of dismissal on the ground that the statements were substantially true.”).

Finally, many of the facts upon which Defendant bases her argument that her defamatory statement was true are wholly tangential to the claims against her by Ms. Giuffre and the defamatory statement. For example, Defendant supports her contention that she did not recruit Ms. Giuffre for sex with Epstein based on the fact that Ms. Giuffre lived independently of her parents before meeting Epstein and Ms. Maxwell. (Of course, a child outside the supervision of her parents makes it much more likely she would be recruited by Defendant into sex trafficking, but that is for the jury to decide.) That fact does not go to whether or not Defendant’s statement calling Ms. Giuffre a liar is true, because Ms. Giuffre never made any claims relating to where she lived prior to meeting Defendant. Moreover, it is immaterial with whom she was living: the fundamental and overarching fact remains that Defendant recruited Ms. Giuffre for sex with Epstein when she was a minor child.

Defendant next proffers Ms. Giuffre’s limited high school enrollment and short-term jobs that she held as evidence that she and Epstein did not abuse her. The logic of this position is

unclear. The fact that Ms. Giuffre worked at Taco Bell for a few days hardly establishes she was not abused by Defendant and Epstein. Indeed, if anything it shows the vulnerability of Ms. Giuffre to enticements that a billionaire and his wealthy and powerful girlfriend could offer. In any event, what to make of such fact is something for the jury to consider. They are irrelevant for the same reason as above: Ms. Giuffre never made any claims about her studies or her prior employment. Indeed, neither Ms. Giuffre's statement about being recruited by Defendant as a child, nor Defendant's refutation even mentions Ms. Giuffre's lack of schooling or lack of a stable home as a child. Purported facts that have nothing to do with Ms. Giuffre's claims of sexual abuse against Defendant, and nothing to do with Defendant calling Ms. Giuffre a liar for such claims, do not establish the "*substantial* truth" of Defendant's statement. Tellingly, Defendant cites to no analogous case in any jurisdiction that even suggests otherwise.

VI. PLAINTIFF DOES NOT NEED TO ESTABLISH MALICE FOR HER DEFAMATION CLAIM, BUT IN THE EVENT THE COURT RULES OTHERWISE, THERE IS MORE THAN SUFFICIENT RECORD EVIDENCE FOR A REASONABLE JURY TO DETERMINE DEFENDANT ACTED WITH ACTUAL MALICE

Defendant's next (and, again, quite remarkable) argument is that Ms. Giuffre somehow will be unable to establish actual malice in this case. One would think that a sex trafficker calling one of her victims a liar would be a quintessential example of actual malice. Defendant's spurious case citations and misplaced argument do not detract from this core fact.

Though Defendant does not mention the legal standard for actual malice until she is 48 pages into her 68-page brief,⁴⁶ the legal definition of actual malice, as defined by the United

⁴⁶ Though perhaps a scrivener's error, Defendant errantly cites to two Supreme Court cases – *Gerts v. Robert Welch, Inc.*, 418 U.S. 323 (1974) and *Philadelphia Newspapers, Inc. v. Hepps*, 475 U.S. 767 (1986) – that arose out of the laws of Illinois and Pennsylvania, respectively, to support a proposition concerning New York law. Defendant also cites to *Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 109 S. Ct. 2678, 105 L. Ed. 2d 562 (1989), wherein the ruling was not at summary judgment, and the plaintiff in the defamation case was a judicial candidate in a public election.

States Supreme Court, and reiterated by the Second Circuit, should be the light by which all of Defendant's purported "facts" and argument should be viewed. "Actual malice" means that the statement was published with "knowledge that the statement was 'false or with reckless disregard of whether it was false or not.'" *Baiul v. Disson*, 607 F. App'x 18, 20 (2d Cir. 2015), quoting *New York Times Co. v. Sullivan*, 376 U.S. 254, 280, 84 S. Ct. 710, 11 L.Ed.2d 686 (1964).

Defendant argues that Ms. Giuffre is a limited purpose public figure. While Ms. Giuffre disputes that claim, the issue is entirely irrelevant here because Ms. Giuffre will prove at trial, with overwhelming evidence, that Defendant made her statement calling Ms. Giuffre a liar with malice, fully knowing – as a sex trafficker – that it was false. Put another way, Defendant knew that Ms. Giuffre was telling the truth when she described how Defendant recruited her for sex as an underage girl and then sexually trafficked her with her boyfriend Jeffrey Epstein.

The Second Circuit instructs that, "[o]n a motion for summary judgment, a court cannot try issues of fact; it can only determine whether there are issues to be tried. If, as to the issue on which summary judgment is sought, there is any evidence in the record from any source from which a reasonable inference could be drawn in favor of the nonmoving party, summary judgment is improper." *Chambers v. TRM Copy Ctrs. Corp.*, 43 F.3d 29, 37 (2d Cir. 1994) (internal citations and quotations omitted). "As the moving party, Defendants have the burden of demonstrating an absence of clear and convincing evidence substantiating Plaintiffs' claims." *De Sole v. Knoedler Gallery, LLC*, 139 F. Supp. 3d 618, 640 (S.D.N.Y. 2015) (citing *Chambers*).

Defendant fails to meet her burden of demonstrating an absence of clear and convincing evidence substantiating Ms. Giuffre's claims that Defendant acted with actual malice. Ms. Giuffre will easily be able to meet any trial burden of clear and convincing evidence of actual

malice. Tellingly, Defendant does not even attempt to address the documentary evidence, nor the testimonial evidence showing she was a recruiter of girls for Epstein.

As shown above, far beyond showing that a reasonable inference could be drawn in her favor, which is all that is required at this point to defeat Defendant's motion, Ms. Giuffre will easily be able to meet her trial burden of clear and convincing evidence of actual malice.

Of course, a plaintiff need only show "actual malice" on the part of a defendant if that plaintiff is a public figure or a limited public figure, which Ms. Giuffre is not, as explained *infra*.

VII. THE COURT NEED NOT REACH THE ISSUE, AT THIS TIME, OF WHETHER MS. GIUFFRE IS A LIMITED PURPOSE PUBLIC FIGURE

For the reasons just explained, Ms. Giuffre will easily be able to prove actual malice at the trial in this case. Defendant argues that Ms. Giuffre "is a public figure who must prove actual malice." MSJ at 49. Given the overwhelming proof of the second part of that statement, the Court need not spend its time considering the first.

If the Court wishes to nonetheless consider the issue at this time, it is not appropriate for disposition at the summary judgment stage of this case. The defendant bears the burden of demonstrating that the plaintiff is a limited purpose public figure. *See Lerman v. Flynt Distrib. Co.*, 745 F.2d 123, 136–37 (2d Cir. 1984). Defendant correctly articulates the legal test for a finding that a plaintiff is a limited purpose public figure, but glosses over the fact that all prongs of the test must be met in order for a court to make that finding. *See, e.g., Contemporary Mission, Inc. v. N.Y. Times Co.*, 842 F.2d 612, 617 (2d Cir. 1988) ("[T]his court set forth a **four part test** for determining whether someone is a limited purpose public figure" (emphasis added)); *Herbert v. Lando*, 596 F. Supp. 1178, 1186 (S.D.N.Y. 1984) ("The Second Circuit recently summarized the **criteria**" (emphasis added)), *aff'd in part, rev'd in part*, 781 F.2d 298 (2d Cir. 1986); *cf. Nehls v. Hillsdale Coll.*, 178 F. Supp. 2d 771, 778 (E.D. Mich. 2001) (finding plaintiff

was not a limited public figure for failing one element of the *Lerman* test and thus denying defendant's motion for summary judgment) ("The defendant has proven all of the elements but the third ..."), *aff'd*, 65 F. App'x 984 (6th Cir. 2003). Of course, proof that Ms. Giuffre (or anyone else) is a limited purpose public figure requires proof of a set of facts from which Ms. Giuffre believes Defendant has not shown in satisfaction of the four-part test.

Significantly –this Court should pause here to note that the details of Jane Doe 3's sexual exploitation and abuse, as anonymously set forth in her CVRA joinder motion, ***caused the Defendant to identify, with certainty, Jane Doe 3 as Ms. Giuffre***. Yet, at her deposition, Defendant claimed to "barely remember her at all."⁴⁷ Defendant's ability to immediately and positively identify the anonymous individual making claims of sexual abuse, if anything, shows that Defendant was intimately aware of Ms. Giuffre's sexual exploitation.

And, to be sure, Ms. Giuffre never asked to be sexually abused or trafficked by Defendant or convicted pedophile Jeffrey Epstein when she was a child – legally, she did not even have the capacity to consent. Defendant cannot recruit a minor child for sexual exploitation and then, afterwards, argue that her victim injected herself into the public controversy when coming forward about the abuse she suffered.

Moreover, Defendant has not made a sufficient showing that Ms. Giuffre has "regular" and "continuing" access to the news media. The policy rationale behind this prong is that public figures generally enjoy significant access to the media. One reporter wrote some articles on Ms. Giuffre in 2011. Thereafter, it was not until 2015, that Ms. Giuffre spoke to someone in the news media about these issues, and that interview was granted ***after*** Defendant's defamatory remarks. Such limited contacts precludes a finding that Ms. Giuffre is a limited public figure. *See*

⁴⁷ *See* McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 44:23-45:4 (July 22, 2016) ("Q. You do remember Virginia, about that time back in the 2000s, giving Mr. Epstein massages? A. I barely remember her at all.").

Hutchinson v. Proxmire, 443 U.S. 111, 99 S. Ct. 2675, 61 L.Ed.2d 411 (1979) (finding plaintiff maintained no regular and continuing access to the media and thus was not a public figure).

It is also unclear how Defendant plans to show that Ms. Giuffre “successfully invited public attention to her views.” To be sure, Ms. Giuffre decided to start “Victims Refuse Silence,” a not-for-profit organization whose mission is “to change the landscape of the war on sexual abuse and human trafficking. Our goal is to undertake an instrumental role in helping survivors break the silence associated with sexual abuse. To fulfill this mission, we aim to enhance the lives of women who have been victimized.”⁴⁸ The website lists the National Trafficking Hotline, and provides a state-by-state resources for local organizations where victims can seek help. Unsurprisingly, Defendant cites no cases that hold that maintaining a website makes one a public figure. *See Mitre Sports Int’l Ltd. v. Home Box Office, Inc.*, 22 F. Supp. 3d 240, 252 (S.D.N.Y. 2014) (finding plaintiff was not a limited public figure and denying defendant’s motion for summary judgment) (“corporate policy denouncing child labor on its website ... do[es] not show that Mitre ... aimed to influence the public’s views on the controversy”). More important, Defendant does not explain how Ms. Giuffre was using the website to influence public views on whether she had been abused by Defendant – the subject at issue in this lawsuit.

Interestingly, Defendant has spent \$ 17,875⁴⁹ on an expert witness to tell the Court and the jury that hardly anyone searches on the internet using search terms such as “victims refuse silence sex slave.” One of Defendant’s six briefs raising *Daubert* issues specifically argues that Dr. Anderson’s estimates on the cost of remediating Ms. Giuffre’s online reputation are improper because Dr. Anderson included nearly unused search phrases when evaluating internet content. Kent’s rebuttal report states: “. . . there seems no reason to believe that such a person would use

⁴⁸<http://www.victimsrefusesilence.org/our-mission>.

⁴⁹ See McCawley Dec. at Exhibit 9, Kent Dep. Tr. at 25:16-26:6.

this term . . . Indeed, these are terms unlikely to be used by anyone unfamiliar with this litigation. . . . Why, for instance, would it be necessary to push down offending Web pages in the results that the search engines provide for the term victim's refuse silence sex slave, when this term is likely never used . . ." *See* McCawley Dec. at Exhibit 25, Kent Report at 10, 33.

Defendant cannot argue to the Court that Ms. Giuffre has "successfully" invited public attention to her views through her VRS website while simultaneously filing a *Daubert* motion that argues that search terms such as "victims refuse silence sex slave" are "likely never used," thus making the website unsuccessful in inviting public attention. In any event, Defendant has failed to set forth with precision the allegedly undisputed fact – and supporting evidence – she uses to support her argument.

Moreover, "[i]t is preferable to reduce the public figure question to a more meaningful context by looking to the nature and extent of *an individual's participation in the particular controversy giving rise to the defamation.*" *Greenberg v. CBS Inc.*, 69 A.D.2d 693, 704, 419 N.Y.S.2d 988, 995 (1979) (emphasis added), citing *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 345, 352, 94 S. Ct. 2997, 41 L.Ed.2d 789. The context here is highly significant. Ms. Giuffre never chose to participate in Defendant and Epstein's underage sex ring, a "controversy" that gave rise to Defendant's defamation. In arguing that Ms. Giuffre thrust herself into the public spotlight, Defendant conveniently leaves out the fact that it is by her doing that Ms. Giuffre is in this controversy in the first place. No minor child willingly becomes a participant in sexual abuse, and it is perverse for the abuser to argue that her victim deliberately became a subject of public attention when speaking out about that abuse for the purpose of advancing justice and helping other victims.

For all these reasons, the Court should simply decline to decide the public figure issue at this juncture. But if it chooses to reach the issue, it should reject Defendant's unsupported argument.

VIII. THE JANUARY 2015 STATEMENT WAS NOT "SUBSTANTIALLY TRUE," AND MS. GIUFFRE HAS PRODUCED CLEAR AND CONVINCING EVIDENCE OF ITS FALSITY

As a final argument, Defendant argues that her January 2015 statement was "substantially true." Given that the statement argues that Ms. Giuffre lied when she said she was sexually trafficked by Defendant, the reader of Defendant's motion might reasonably expect to see some evidence presented showing that Defendant was not a sex trafficker. Instead, the reader is treated to technical quibbles. For example, the lead argument to show the "substantial" truth of Defendant's statement is the argument that Ms. Giuffre was not fifteen years old, but all of sixteen or seventeen years old when she was trafficked. As the Court knows (and can take judicial notice of), Florida law makes age eighteen the age of consent. Accordingly, it is no moment that Ms. Giuffre may have been mistaken about the exact year the sex trafficking started. Call this the "yes-I'm-a-sex-trafficker-but-only-of-sixteen-year-old-girls" defense. To even describe the defense is to show how meritless it is.

More broadly, at issue are the statements Ms. Giuffre made regarding Defendant's involvement in, and knowledge of, the sexual abuse and sex trafficking of Ms. Giuffre (and other minor girls) through a recruitment scheme executed by Defendant and Jeffrey Epstein. In response to those various statements, Defendant publicly claimed that, "the allegations made by (Ms. Giuffre) *against* Ghislaine Maxwell are untrue." Defendant continued that Ms. Giuffre's "claims are obvious lies and should be treated as such...." Defendant, through her statement

intended to convey that Ms. Giuffre was lying about everything she had said against Defendant – “the allegations.”

In sum and essence, those statements made by Ms. Giuffre about which Defendant released a public statement to exclaim were “untrue” and “obvious lies” were:

- (1) That Defendant approached Ms. Giuffre while Ms. Giuffre was an underage minor working at the Mar-a-Lago Country Club, and recruited the then-minor Ms. Giuffre to go to the house of Jeffrey Epstein under the pretense of providing a massage to Jeffrey Epstein for money;
- (2) That Ms. Giuffre followed Defendant’s instructions, and was driven to Jeffrey Epstein’s house, where she was greeted by Defendant and later introduced to Jeffrey Epstein;
- (3) That Ms. Giuffre was lead upstairs to be introduced to Jeffrey Epstein in his bedroom, and that while there Defendant demonstrated how Ms. Giuffre should provide a massage to Jeffrey Epstein;
- (4) That Defendant and Epstein converted the massage into a sexual experience, requesting that Ms. Giuffre remove her clothing, after which time a sexual encounter was had;
- (5) That Defendant and Epstein expressed approval for Ms. Giuffre, and offered her money in exchange for this erotic massage turned full sexual encounter;
- (6) That Defendant and Epstein offered Ms. Giuffre the promise of money and a better life in exchange for Ms. Giuffre acting sexually compliant and subservient to their demands;
- (7) That Ms. Giuffre, after that first encounter, was repeatedly requested to service Epstein and/or Defendant sexually and/or others;
- (8) That Ms. Giuffre was taken on Epstein’s private planes on numerous occasions and trafficked nationally and internationally for the purpose of servicing Epstein and others, including Defendant, sexually;
- (9) That Defendant was Epstein’s primary manager of the recruitment and training of females who Epstein paid for sexual purposes;
- (10) That Defendant participated in sexual encounters with females, including Ms. Giuffre; and
- (11) That Ms. Giuffre and other recruited females were encouraged by Defendant and Epstein to bring other young females to Epstein for the purpose of servicing him sexually.

Defendant, by way of her January 2015 statement, declared that Ms. Giuffre lied about each and every one of these allegations regarding Defendant. In fact, Defendant clarified further this position in her deposition when she said repeatedly that everything Ms. Giuffre said about Defendant was totally false.⁵⁰ The clarification in her deposition is identical in intention to the reasonable interpretation of her statement that Defendant made publicly, which has formed the basis of this defamation action—that Ms. Giuffre was lying about everything she said about Defendant, and that Defendant was not at all involved in the activity she was accused of engaging in.

While her public statement could not have been more clear, as her deposition testimony further underscored, Defendant intended the world to believe that nothing Ms. Giuffre said about Defendant was true, and that Defendant was not at all involved with any of the things she was accused of. Defendant has decided in this motion to minutely dissect the nuance of Ms. Giuffre’s various statements to cause the Court to reach a far-fetched conclusion that Defendant’s insidiously false statement was somehow “substantially true.” Ironically, this repositioning amounts to nothing more than an admission by Defendant of the defamatory nature of her statement.

A. When Ms. Giuffre Initially Described Her Encounters With Defendant and Epstein, She Mistakenly Believed the First Encounter Occurred During the Year 1999.

Discovery has resulted in the production of records, including Ms. Giuffre’s employment records from Mar-a-Lago, which she did not possess at the time she was recounting her interactions with Defendant. Those records establish that the initial encounter wherein Defendant recruited Ms. Giuffre occurred during the year 2000 and not during 1999. Ms. Giuffre was

⁵⁰ See McCawley Dec. at Exhibit 11, Maxwell 4-22-2016 Dep. Tr. at 135:3-4; 178:15-178:24; 179:20-180:7; 228:7-229:10.

sixteen years old before August 9, 2000, and turned seventeen on that date. It is unclear from the limited records available whether Defendant approached and recruited Ms. Giuffre before or just after Ms. Giuffre's 17th birthday. However, what has now been established through numerous witnesses is that Defendant approached and recruited a minor child for the purposes of enticing that minor over to the house of Jeffrey Epstein, a currently-registered sex offender.⁵¹ The exact lure of Ms. Giuffre by Defendant - enticement of being paid money to give a billionaire a massage at his mansion - was used by Epstein and his many associates and employees to recruit dozens and dozens of other underage girls. There is no doubt that the crux of Ms. Giuffre's statement on this point is that Defendant recruited her when she was only a minor child unable to consent to sex, not precisely how far under the age of consent she was. Defendant's public claim that Ms. Giuffre's account of this approach, and recruiting element, was "untrue" and "obvious lies" is not "substantially true," but is itself an obvious lie – as Ms. Giuffre will prove to the jury at trial.

B. Defendant's January 2015 Statement Claiming as "Untrue" and an "Obvious Lie" the Allegation That She Regularly Participated in Epstein's Sexual Exploitation of Minors and That the Government Knows Such Fact is Not Substantially True But Instead Completely False.

Defendant next argues that she "accurately denied that [she] 'regularly participate[d] in Epstein's sexual exploitation on minors' and that 'the Government knows such fact.'" MSJ at 58. It is not clear whether Defendant is nitpicking this statement by contesting whether she "regularly" participated in Epstein's sexual exploitation or whether she did participate, but the Government was unaware of the extent of her involvement. Call this the "yes-I'm-a-sex-trafficker-but-only-on-Tuesdays-and-Thursdays" defense – here again, to simply recount the claim is to see its absurdity.

⁵¹ See McCawley Dec. at Exhibit 1, 5, Alessi Dep. Tr. at 94:24-95:2; Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12.

Contrary to Defendant's misleading, cherry-picked fragments of information she has chosen to use to support her point, there is an abundance of evidence clearly linking Defendant to Epstein's sexual exploitation of minors. As the Court is aware, numerous message pads were recovered from Epstein's home indicating Defendant's involvement in and knowledge of Epstein's illegal exploitation.⁵² Additionally, numerous employees and others have testified about Defendant's high-ranking position in the hierarchal structure of the sexual exploitation scheme.⁵³ In fact, multiple individuals, in addition to the Ms. Giuffre, have testified about Maxwell's involvement in the exploitation of minors, including Ms. Giuffre.⁵⁴

Defendant also argues that one government investigator, Palm Beach, Florida, Detective Recarey, may not have been aware of her involvement in the sex trafficking. Defendant fails to cite another passage in Detective Recarey's deposition, where he noted that he was aware of Defendant's involvement with Epstein and the sexual exploitation of children.⁵⁵ But even assuming Recarey was unaware (which Ms. Giuffre strongly disputes), Defendant would have, at most, a "yes-I'm-a-sex-trafficker-but-I-successfully-hid-it-from-one-of-the-cops" defense – again, not a likely claim.

More broadly, Ms. Giuffre's statement about what the "Government" knew about sex trafficking was made in pleadings filed in a *federal* Court case attacking the decision of the U.S. Attorney's Office for the Southern District of Florida to offer Jeffrey Epstein immunity from prosecution for *federal* sex trafficking crimes. Accordingly, to present an even arguable claim for summary judgment, Defendant would have to show that the U.S. Attorney's Office (and its

⁵² See, e.g., McCawley Dec at Exhibit 28 (message pad excerpts), GIUFFRE 001412, 001418, 001435, 001446, 001449, 001453, 001454.

⁵³ See McCawley Dec. at Exhibit 21, 1, Rodriguez Dep. Tr. at 169:1-169:4; Alessi Dep. Tr. at 23:11-23:20; 34:19-35:3; 98:5-98:12; 104:15-104:23.

⁵⁴ See McCawley Dec. at Exhibit 16, 4, Sjoberg Dep. Tr. at 13; Figueroa Dep. Tr. at 96-97; 103; 200:6-18; 228:23-229:21.

⁵⁵ See McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 29:16-29:20; 45:13-25; 83:3-83:15.

investigators from the FBI) did not know about Defendant's sex trafficking. This proof would need to include, for example, evidence that the FBI did not learn about Defendant's sex trafficking when (among other things) Ms. Giuffre told FBI agents about it when she met with them in Australia in 2011. Here again, Defendant has no evidence to even begin making such a showing.

C. Defendant's January 2015 Statement Claiming as "Untrue" or an "Obvious Lie" That Maxwell and Epstein Converted Ms. Giuffre Into a Sexual Slave is Not Substantially True.

Defendant next argues that she accurately disputed Ms. Giuffre's statement that Defendant held her as a "sex slave." Relying on dictionary definitions of "slave" that define the term to refer to a "confined" person who is the "legal property" of another (MSJ at 59, citing *Merriam-Webster*, etc.), Defendant claims Ms. Giuffre was not confined or the property of Defendant. Call this the "yes-I'm-a-sex-trafficker-but-I-didn't-use-chains" defense. And, once again, to even describe the defense is to refute it.

Defendant does not explain why the jury would be required to use the held-in-chains definition of "slave" in evaluating her statement. *Merriam-Webster* (11th ed. 2006) also defines "slave" as "one that is completely subservient to a dominating influence" – a definition that fits Ms. Giuffre's circumstances to a tee. As Ms. Giuffre has explained in detail, she was recruited as a minor child by Defendant, who then dominated her and used for sexual purposes. That testimony alone creates a genuine issue of fact on this point.

From the context of all of Ms. Giuffre's statements about Defendant, Ms. Giuffre has never said or implied that she was physically placed in a cage. Instead, she has described the vast disparity of power and the influence of Defendant and Epstein, the fear of disobedience, the typical locations of the abuse being in a private plane, in huge mansion manned with Epstein employed servants, a private island, or some inescapable place abroad in the presence of

Defendant, in addition to the continued – and fraudulent – promise of a better future, as those things that kept her retained in a situation of sexual servitude. While not physical chained, Ms. Giuffre was groomed as minor and trained, and these factors became her invisible chains.

Indeed, as Ms. Giuffre’s expert on sex trafficking, Professor Coonan, has explained:

Popular understandings of the term “sex slave” might still connote images of violent pimps, white slavery, or of victims chained to a bed in a brothel in the minds of some people. To call Ms. Giuffre a victim of sex trafficking would however very accurately convey the reality that she along with a great many other victims of contemporary forms of slavery are often exploited by the “invisible chains” of fraud and psychological coercion.

See McCawley Dec. at Exhibit 23, Coonan Expert Report at 20.

If the Court takes as true, which it must for the purpose of this motion, that Ms. Giuffre was trafficked and used exclusively for sexual purposes by Defendant and Epstein, then the Court must also reach the conclusion at this stage that Maxwell’s assertion – that Ms. Giuffre’s description of being a sex slave is “untrue” or “obvious lies” – is not substantially true. There undoubtedly remains a genuine issue of material fact on this point, and in fact, Defendant’s position taken in this motion is tantamount to an admission of the truth of Plaintiff’s statement about Defendant on this point.

D. Any Statement of Misdirection Regarding Professor Alan Dershowitz is Nothing More Than an Irrelevant Distraction to The Facts of This Case and Matters Not on the Defense of Whether Defendant’s Statement Was Substantially True.

Defendant next contends that she accurately recounted that Alan Dershowitz had denied having sex with Ms. Giuffre. MSJ at 60. Call this the “yes-I’m-a-sex-trafficker-but-she-was-not-trafficked-to-the-professor” defense. While it is accurate that Ms. Giuffre made allegations against Professor Dershowitz, those allegations are not at issue in this case. Defendant, in her defamatory statement, claimed that “the allegations made by [Ms. Giuffre] against Ghislaine Maxwell are untrue.” *See McCawley Dec. at Exhibit 26, GM_00068.* In her deposition,

Defendant maintained the position that she “cannot speculate on what anybody else did or didn’t do.” *See* McCawley Dec. at Exhibit 11, Maxwell 4-22-2016 Dep. Tr. at 180:3-180:4. In fact, regarding Ms. Giuffre’s claims about others, Defendant unequivocally stated, “I can only testify to what she said about me, which was 1000 percent false.” *See* McCawley Dec. at Exhibit 11, Maxwell 4-22-2016 Dep. Tr. at 228:10-228:12.

Defendant Maxwell makes additional misstatements about Dershowitz’s production in a defamation action filed against him in her desperate attempt to have Dershowitz to jump aboard and help bail out her sinking canoe. While Ms. Giuffre can – and, if necessary, will – refute Dershowitz’s claim he was not a beneficiary of Epstein and Defendant’s sex trafficking, that is not relevant at this stage. Whatever may or may not have happened with Dershowitz (and Ms. Giuffre’s sworn statements that he sexually abused her is alone enough to create disputed facts on the issue of whether Defendant’s statements about him were “substantially true”) has no bearing whatsoever on the truth or falsity of the statements Ms. Giuffre made about Defendant.

This case is not about whether Ms. Giuffre has ever made untruthful allegations against anyone, which she contends she has not, but about whether her allegations about Defendant were true, or whether those specific allegations were “untrue,” “obvious lies” as Defendant publicly proclaimed. These issues are disputed and must go to the jury.

E. Contrary to Defendant’s Position, There is a Genuine Issue of Material Fact as to Whether She Created or Distributed Child Pornography, or Whether the Government Was Aware of Same.

Defendant next argues that she did not create child pornography and that the Government knew this. Call this the “until-you-find-the-photos-I’m-innocent” defense. Of course, as noted earlier, Defendant’s claim requires that she show that “the Government” – in context, the FBI and the U.S. Attorney’s Office for the Southern District of Florida – “knew” that she had no

child pornography. Yet Defendant has offered no such evidence – much less evidence so powerful as to warrant summary judgment on this point.

This point is disputed from the simple fact that Ms. Giuffre herself testified that Defendant took many photograph of her naked. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 232:3-9; 233:7-9. This is consistent with the Palm Beach butler’s, Alfredo Rodriguez’s, testimony that he personally saw photos of naked children on Defendant’s computer. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 150:10-17; 306:1-306:24. Another housekeeper, Juan Alessi also saw photos of young nude females on Defendant’s computer, although he wasn’t sure whether to consider it pornography. *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 175:5-175:24. Finally, Detective Recarey found a collage of nude photos of young females in Epstein’s closet, and turned the photos over to the FBI and U.S. Attorney’s office.⁵⁶ While the U.S. Attorney’s office will not share the photos obtained from Recarey’s investigation, it is thus undisputed that the government possesses photos of nude, young females confiscated from Epstein’s Palm Beach mansion. Indeed, the police video disclosed through a FOIA request shows naked images of women throughout the house, including a full nude of the Defendant.⁵⁷ At a minimum, there is a clear genuine issue of material fact in this regard.

F. Defendant Did Act as a “Madame” For Epstein to Traffic Ms. Giuffre to The Rich and Famous.

Defendant next argues that she did not act as a “Madame” for Epstein. MSJ at 63. The gist of the argument seems to be that Defendant believes trafficking one girl to Epstein does not a Madame make. Call this the “yes-I-was-Virginia’s-Madame-but-no-one-else’s” defense. This argument fails linguistically on the very dictionary definitions that Defendant cites elsewhere –

⁵⁶ *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 73:19-73:24; 74:2-74:7.

⁵⁷ *See* McCawley Dec. at Exhibit 44, FOIA CD GIUFFRE 007584.

but not here. *See Merriam-Webster* (11th ed. 2006) (defining “madam” as “the female head of a house of prostitution”).

Once again, Defendant conceals the relevant facts on this issue. First, multiple witnesses have testified to Defendant’s recruiting, maintaining, harboring, and trafficking girls for Epstein.⁵⁸ In fact, Defendant herself was unable to deny procuring Ms. Giuffre for Epstein.⁵⁹ While Defendant has attempted to fumble her way through explaining some plausible reason for bringing a sixteen or seventeen year old to Epstein, her explanations are, to put it blandly, unpersuasive. As with other issues, the jury will have to decide who to believe.

One of the individuals Ms. Giuffre was trafficked to was Prince Andrew – trafficking that took place in Defendant’s own townhouse in London. There exist flight logs evidencing Ms. Giuffre flying to London alongside Defendant and Epstein on Epstein’s private plane, and a photo of Ms. Giuffre, Defendant, and the Prince, without Defendant ever offering a legal reasonable explanation for that photo being taken, or for traveling with a year old girl overseas.

Defendant begins to meander somewhat aimlessly on this point, shifting Plaintiff’s burden to substantiate Plaintiff’s claim that Defendant was Epstein’s Madame, which is a point at issue, into whether or not Plaintiff has conclusively proven the identities and accurate job titles of the other men to whom Plaintiff was lent for sex by Epstein. No matter how hard Defendant tries to reframe this case, drag other people in, or split hairs, she is unable to contest the facts – facts showing she was more than a Madame but a full-fledged sex trafficker. Ms. Giuffre told the truth when she said that Defendant recruited her as a minor, under the pretense of giving a

⁵⁸ *See* McCawley Dec. at Exhibit 16, 1, 18, 2, Sjoberg Dep. Tr. at 13; Alessi Dep. Tr. at 34; GIUFFRE000105 at 57-58; GIUFFRE000241-242 at p. 212-213; Austrich Dep. Tr. at 34-35, 100-101, 127-128; Alessi Dep. Tr. at 34:19-35:3; 98:5-98:12; 104:15-104:23.

⁵⁹ *See* McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 214:14-215:3.

massage, and converted her into a traveling sex slave, consistent with Defendant and Epstein's pattern and practice.

As the Court astutely acknowledged early on, "at the center of this case is the veracity of a contextual world of facts more broad than the allegedly defamatory statements . . . either transgression occurred or it did not. Either Maxwell was involved or she was not." If Defendant was involved, then her January 2015 statement was defamatory. Ms. Giuffre will prove to the jury, through overwhelming evidence, her prior allegations about Defendant's involvement. The Court should give Ms. Giuffre that opportunity, and deny Defendant's motion for summary judgment.

IX. CONCLUSION

For the foregoing reasons, this Court should deny Defendant's motion for summary judgment in all respects.

Dated: January 31, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on January 31, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**SOUTHERN DISTRICT OF NEW YORK LOCAL RULE 56.1 PLAINTIFF'S
STATEMENT OF CONTESTED FACTS AND PLAINTIFF'S UNDISPUTED FACTS**

DEFENDANT'S PURPORTED FACTS

1. **Ms. Maxwell's response to publications of Ms. Giuffre's false allegations: the March 2011 statement.** In early 2011 Ms. Giuffre in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. In the articles, Ms. Giuffre made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, Ms. Giuffre suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies that the allegations she made against Ms. Maxwell are false. Furthermore, Ms. Giuffre did give an interview to journalist, Sharon Churcher, in which Ms. Giuffre accurately and truthfully described Defendant Maxwell's role as someone who recruited or facilitated the recruitment of young females for Jeffrey Epstein. *See* McCawley Dec. at Exhibit 34, GIUFFRE003678. Ms. Giuffre was also interviewed by the FBI in 2011 and she discussed Defendant's involvement in the sexual abuse. *See* McCawley Dec. at Exhibit 31, FBI Redacted 302, FIUFFRE001235-1246. Those statements were not "false and defamatory," but instead truthful and accurate.

DEFENDANT'S PURPORTED FACTS

2. In the articles, Ms. Giuffre alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre does not contest this fact, but believes that it is irrelevant.

DEFENDANT'S PURPORTED FACTS

3. In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying "the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies that Mr. Barden, "issued a statement." Instead it appears to have the contact as Ross Gow and a reference to Devonshire Solicitors.

DEFENDANT'S PURPORTED FACTS

4. The statement read in full:

Statement on Behalf of Ghislaine Maxwell

By Devonshires Solicitors, PRNE Wednesday, March 9, 2011

London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*

It is unacceptable that letters sent by Ms. Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, *Ms. Maxwell is now proceeding to take legal action against those newspapers.*

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

Media contact:

Ross Gow

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GIUFFRE001067-68

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

The document speaks for itself although it is unclear if the original included the italics that are inserted by the Defendant above.

DEFENDANT'S PURPORTED FACTS

5. **Ms. Giuffre's gratuitous and "lurid" accusations in an unrelated action.** In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

While we would stipulate to the statement in this paragraph starting with the words "In 2008", we do not stipulate to the opening sentence fragment Maxwell places in bold.

DEFENDANT'S PURPORTED FACTS

6. Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a "corrected" joinder motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed.

DEFENDANT'S PURPORTED FACTS

7. The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a "known victim[]" of Mr. Epstein and the Government owed them CVRA duties." Yet, "the bulk of the [motion] consists of copious factual details that [Ms. Giuffre] and [her co-movant] 'would prove . . . if allowed to join.'" Ms.

Giuffre gratuitously included provocative and “lurid details” of her alleged sexual activities as an alleged victim of sexual trafficking.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

Ms. Giuffre denies that the issues presented in here joinder motion were narrow. The issues presented by the joinder motion and related pleadings were multiple and complex, requiring numerous details about Ms. Giuffre’s sexual abuse and the perpetrators of her abuse. In a pleading explaining why the motion was filed, Ms. Giuffre’s lawyers specifically listed nine separate reasons why Jane Doe 3’s allegations that Dershowitz had sexually abused her were relevant to the case and appropriately included in the relevant filings:

1. To establish that Jane Doe 3 had been sexually abused by Jeffrey Epstein and his co-conspirators (including co-conspirator Alan Dershowitz), which would make her a “victim” of a broad sex trafficking conspiracy covered by the federal Crime Victims’ Rights Act, 18 U.S.C. § 3771, and therefore entitled to participate in the case;

2. To support then-pending discovery requests that asked specifically for information related to contacts by Dershowitz with the Government on behalf of Jeffrey Epstein;

3. To support the victims’ allegation that the Government had a motive for failing to afford victims with their rights in the criminal process – specifically, pressure from Dershowitz and other members of Epstein’s legal defense team to keep the parameters of the non-prosecution agreement (NPA) secret to prevent Jane Doe 3 and other victims from objecting to and blocking judicial approval of the agreement;

4. To establish the breadth of the NPA’s provision extending immunity to “any potential co-conspirators of Epstein” and the scope of the remedy that the victims (including not only Jane Doe 3 but also other similarly-situated minor victims who had been sexually abused by Dershowitz) might be able to obtain for violations of their rights;

5. To provide part of the factual context for the scope of the “interface” between the victims, the Government, and Epstein’s defense team – an interface that was relevant under Judge Marra’s previous ruling that the Government was entitled to raise “a fact-sensitive equitable defense which must be considered in the factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims . . .”;

6. To prove the applicability of the “crime/fraud/misconduct” exception to the attorney-client privilege that was being raised by the Government in opposition to the victims’ motion for production of numerous documents;

7. To bolster the victims’ argument that their right “to be treated with fairness,” 18 U.S.C. § 3771(a)(8), had been violated through the Government’s secret negotiations with one of their abusers;

8. To provide notice and lay out the parameters of potential witness testimony for any subsequent proceedings or trial – i.e., the scope of the testimony that Jane Doe 3 was expected to provide in support of Jane Doe 1 and Jane Doe 2, the already-recognized Ms. Giuffre in the action; and

9. To support Jane Doe 3’s argument for equitable estoppel to toll the six-year statute of limitations being raised by the Government in opposition to her motion to join – i.e., that the statute was tolled while she was in hiding in Australia due to the danger posed by Epstein and his powerful friends, including prominent lawyer Alan Dershowitz.

Jane Does #1 and #2 v. United States, No. 9:08-cv-80736, DE 291 at 18-26 & n.17 (S.D. Fla. 2015). Ms. Giuffre’s lawyers had attempted to obtain a stipulation from the Government on point #1 above (“victim” status), but the Government had declined. Judge Marra’s ruling concluded that certain allegations were not necessary “at this juncture in the proceedings.” DE 324 at 5. Judge Marra specifically added, however, that “Jane Doe 3 is free to reassert these factual details through proper evidentiary proof, should Petitioners demonstrate a good faith basis for believing that such details are pertinent to a matter presented for the Court’s consideration.” DE 324 at 6. The CVRA litigation continues and no trial has been held as of the filing of this brief. As such, the extent to which these factual details will be used at trial has not yet been determined. *See* Docket Sheet, *Jane Does #1 and #2 v. U.S.*, No. 9:08-cv-80736.

DEFENDANT’S PURPORTED FACTS

8. At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre’s name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above.

DEFENDANT'S PURPORTED FACTS

9. As the district court noted in ruling on the joinder motion, Ms. Giuffre "name[d] several individuals, and she offers details about the type of sex acts performed and where they took place." The court ruled that "these lurid details are unnecessary": "The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . . , especially considering that these details involve non-parties who are not related to the respondent Government." Accordingly, "[t]hese unnecessary details shall be stricken." *Id.* The court then struck all Ms. Giuffre's factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. The court said the striking of the "lurid details" was a sanction for Ms. Giuffre's improper inclusion of them in the motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above.

DEFENDANT'S PURPORTED FACTS

10. The district court found not only that the "lurid details" were unnecessary but also that the entire joinder motion was "entirely unnecessary." Ms. Giuffre and her lawyers knew the motion with all its "lurid details" was unnecessary because the motion itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. The court denied Ms. Giuffre's joinder motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above.

DEFENDANT'S PURPORTED FACTS

11. One of the non-parties Ms. Giuffre "named" repeatedly in the joinder motion was Ms. Maxwell. According to the "lurid details" of Ms. Giuffre included in the motion, Ms. Maxwell personally was involved in a "sexual abuse and sex trafficking scheme" created by Epstein:
 - Ms. Maxwell "approached" Ms. Giuffre in 1999 when Ms. Giuffre was "fifteen years old" to recruit her into the scheme.
 - Ms. Maxwell was "one of the main women" Epstein used to "procure under-aged girls for sexual activities."
 - Ms. Maxwell was a "primary co-conspirator" with Epstein in his scheme.

- She “persuaded” Ms. Giuffre to go to Epstein’s mansion “in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children.”
- At the mansion, when Ms. Giuffre began giving Epstein a massage, he and Ms. Maxwell “turned it into a sexual encounter.”
- Epstein “with the assistance of” Ms. Maxwell “converted [Ms. Giuffre] into . . . a ‘sex slave.’” *Id.* Ms. Giuffre was a “sex slave” from “about 1999 through 2002.”
- Ms. Maxwell also was a “co-conspirator in Epstein’s sexual abuse.”
- Ms. Maxwell “appreciated the immunity” she acquired under Epstein’s plea agreement, because the immunity protected her from prosecution “for the crimes she committed in Florida.”
- Ms. Maxwell “participat[ed] in the sexual abuse of [Ms. Giuffre] and others.”
- Ms. Maxwell “took numerous sexually explicit pictures of underage girls involved in sexual activities, including [Ms. Giuffre].” *Id.* She shared the photos with Epstein.
- As part of her “role in Epstein’s sexual abuse ring,” Ms. Maxwell “connect[ed]” Epstein with “powerful individuals” so that Epstein could traffic Ms. Giuffre to these persons.
- Ms. Giuffre was “forced to have sexual relations” with Prince Andrew in
- “[Ms. Maxwell’s] apartment” in London. Ms. Maxwell “facilitated” Ms. Giuffre’s
- sex with Prince Andrew “by acting as a ‘madame’ for Epstein.”
- Ms. Maxwell “assist[ed] in internationally trafficking” Ms. Giuffre and “numerous other young girls for sexual purposes.”
- Ms. Giuffre was “forced” to watch Epstein, Ms. Maxwell and others “engage in illegal sexual acts with dozens of underage girls.”

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

See Ms. Giuffre’s Response to Point #7, above. Ms. Giuffre contests the reference to “lurid details”. Moreover, the testimony from numerous witnesses corroborates the statements Ms. Giuffre made in her joinder motion. *See* below.

- *See* McCawley Dec. at Exhibit 16, Sjoberg’s May 18, 2016 Dep. Tr. at 8-9, 13, 33-35, 142-143
- *See* McCawley Dec. at Exhibit 4, Figueroa June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103
- *See* McCawley Dec. at Exhibit 14, Rinaldo Rizzo’s June 10, 2016 Dep. Tr. at 52-60
- *See* McCawley Dec. at Exhibit 12, Lynn Miller’s May 24, 2016 Dep. Tr. at 115
- *See* McCawley Dec. at Exhibit 13, Joseph Recarey’s June 21, 2016 Dep. Tr. at 29-30

- *See* McCawley Dec. at Exhibit 15, David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36
- Exhibit 2 Excerpted Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570 and 1589
- *See* McCawley Dec. at Exhibit 10, Marcinkova Dep. Tr. at 10:18-21; 12:11-15; etc.
- *See* McCawley Dec. at Exhibit 8, Kellen Dep. Tr. at 15:13-18; 20:12-16; etc. Epstein Dep. Tr. at 116:10-15; 117:18-118:10; etc.
- *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 28, 52-54
- *See* McCawley Dec. at Exhibit 30, U.S. Attorney Victim Notification Letter GIUFFRE002216-002218
- *See* McCawley Dec. at Exhibit 33, July 2001 New York Presbyterian Hospital Records GIUFFRE003258-003290
- *J See* McCawley Dec. at Exhibit 38, Judith Lightfoot psychological records GIUFFRE005431-005438
- *See* McCawley Dec. at Exhibit 28, Message Pad evidencing Defendant arranging to have underage girls and young women come to Epstein's home GIUFFRE001386-001571
- *See* McCawley Dec. at Exhibit 29, Black Book in which Defendant and other household staff maintained a roster of underage girls including [REDACTED]
[REDACTED], who were minors at the time the Palm Beach Police's Investigation of Jeffrey Epstein GIUFFRE001573-00669
- *See* McCawley Dec. at Exhibit 40, Sex Slave books Epstein ordered from Amazon.com at GIUFFRE006581
- *See* McCawley Dec. at Exhibit 32, the folder Defendant sent to Thailand with Ms. Giuffre bearing Defendant's phone number GIUFFRE003191-003192

- See McCawley Dec. at Exhibit 39, the Palm Beach Police Report showing that Epstein used women and girls to collect underage girls for his abuse GIUFFRE005614-005700
- See McCawley Dec. at Exhibit 41, Epstein's Flight Logs showing that Defendant flew with Ms. Giuffre 23 times GIUFFRE007055-007161

DEFENDANT'S PURPORTED FACTS

12. In the joinder motion, Ms. Giuffre also alleged she was "forced" to have sex with Harvard law professor Alan Dershowitz, "model scout" Jean Luc Brunel, and "many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Response to Point #7 and 11, above.

DEFENDANT'S PURPORTED FACTS

13. Ms. Giuffre said after serving for four years as a "sex slave," she "managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed that Ms. Giuffre made this statement and has since discovered evidence that indicates she was mistaken on the exact timeframe of her abuse and was with Defendant and Jeffrey Epstein from the years 2000 – 2002.

DEFENDANT'S PURPORTED FACTS

14. Ms. Giuffre suggested the government was part of Epstein's "conspiracy" when it "secretly" negotiated a non-prosecution agreement with Epstein precluding federal prosecution of Epstein and his "co-conspirators." The government's secrecy, Ms. Giuffre alleged, was motivated by its fear that Ms. Giuffre would raise "powerful objections" to the agreement that would have "shed tremendous public light on Epstein and other powerful individuals."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did not suggest that the Government was part of Epstein's conspiracy to commit sex offenses. The CVRA case deals with whether the Government failed in their responsibilities to the victims to inform the victims that the Government was working out a NPA,

and it is Ms. Giuffre's belief that the Government did fail to so inform the victims, and intentionally did not inform the victims because the expected serious objection from many of the victims might prevent the Government from finalizing a NPA with Epstein. *See* McCawley Dec. at Exhibit 50, Joinder Motion (GIUFFRE00319-00333).

DEFENDANT'S PURPORTED FACTS

15. Notably, the other "Jane Doe" who joined Ms. Giuffre's motion who alleged she was sexually abused "many occasions" by Epstein was unable to corroborate any of Ms. Giuffre's allegations.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This is untrue. The other Jane Doe could corroborate many of Ms. Giuffre's allegations based on a similar pattern of abuse that she suffered by Epstein. She did not know Ms. Giuffre though. [REDACTED], who was deposed in this case, and who was a minor, corroborates the same pattern of abuse. *See* McCawley Dec. at Exhibit 7, [REDACTED] Dep. Tr. at 54:25-57:5.

DEFENDANT'S PURPORTED FACTS

16. Also notably, in her multiple and lengthy consensual interviews with Ms. Churcher three years earlier, Ms. Giuffre told Ms. Churcher of virtually none of the details she described in the joinder motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This is untrue. Furthermore, Defendant does not offer any citation or evidence on this point. Defendant's statement here is knowingly false. Having read the articles and taken Ms. Giuffre's deposition, Defendant knows that Ms. Giuffre did reveal details in 2011 consistent with those in the joinder motion. *See* McCawley Dec. at Exhibit 31, GIUFFRE003678, FBI Redacted 302, GIUFFRE001235-1246.

DEFENDANT'S PURPORTED FACTS

17. **Ms. Maxwell's response to Ms. Giuffre's "lurid" accusations: the January 2015 statement.** As Ms. Giuffre and her lawyers expected, before District Judge Marra in the

CVRA action could strike the “lurid details” of Ms. Giuffre’s allegations in the joinder motion, members of the media obtained copies of the motion.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

See Ms. Giuffre’s Response to Point #7, above.

DEFENDANT’S PURPORTED FACTS

18. At Mr. Barden’s direction, on January 3, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing “a quotable statement on behalf of Ms. Maxwell.” The email was sent to more than 6 and probably less than 30 media representatives. It was not sent to non-media representatives.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

Defendant falsely claims that “[a]t Mr. Barden’s direction, on January 3, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing ‘a quotable statement on behalf of Ms. Maxwell.’” This is a blatant falsehood about the document that is at the heart of this litigation. Record evidence shows that Gow sent that email at Defendant’s direction, not at Mr. Barden’s direction. Indeed, on the evening before his deposition, Mr. Gow produced an email exchange he had with Defendant in which Defendant directs Mr. Gow to send the press statement. It is as follows:

From: G Maxwell <GMax1@ellmax.com>
Date: Fri, 2 Jan 2015 20:14:53 +0000
To: Ross Gow <ross@acuityreputation.com>
Cc: Philip Barden <philip.barden@devonshires.co.uk>
Subject: FW: URGENT - this is the statement

Jane Doe 3 is Virginia Roberts so not a new individual.

The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue.

The original allegations are not new and have been fully responded to and shown to be untrue

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschwitz is involved in having sexual relations with her, which he denies

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Chronologically, this email comes at the end of various other email exchanges between Defendant and Gow that discuss issuing a press release. The subject line of this email that Defendant wrote to Gow states “URGENT – this is the statement,” thereby instructing Gow to release this statement to the press. Shortly after Defendant sent this email to Gow directing him to release the statement, Gow distributed the statement to multiple media outlets. Neither Defendant nor Gow have produced any email in which Barden directed Gow to issue this press release (nor can they).

Despite sending it herself, and despite it being responsive to six court-ordered search terms, Defendant failed to produce this email. Her press agent, Gow, produced this the evening before his deposition on November 17, 2016. At the deposition, Mr. Gow authenticated this email and confirmed that Defendant authorized the statement:

Q. When you sent that email were you acting pursuant to Ms. Maxwell's retention of your services?

A. Yes, I was.

(Exhibit 9 was marked for identification.)

Q. This also appears to be an email chain with you and Ms. Maxwell; is that correct?

A. It does appear to be so.

Q. Did you send the top email of the chain that says "Okay, G, going with this"?

A. I did.

Q. And did you receive from Ms. Maxwell, the bottom email of that chain?

A. I believe so. Well, I believe -- yes, yeah, it was forwarded from Ms. Maxwell, yes.

MR. DYER: Sorry, I don't quite understand that answer.

THE WITNESS: I misspoke that. I did receive it from Ms. Maxwell.

MR. DYER: Okay.

Q. The subject line does have “FW” which to me indicates it's a forward. Do you know where the rest of this email chain is?

A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, “Okay, Ghislaine, I'll go with this.”

It is my understanding that this is the agreed statement because the subject of the second one is “Urgent, this is the statement” so I take that as an instruction to send it out, as a positive command: “This is the statement.”

See McCawley Decl. at Exhibit 6, November 18, 2016, Ross Gow Dep. Tr. at 14:15-17; 44:6-45:13.

Together, the email and Gow's testimony unequivocally establish that Defendant – not Barden – directed and “command[ed]” Gow to publish the defamatory statement. Accordingly, the first sentence of Defendant's Paragraph 18 is false.

The second sentence – “This email was sent to more than 6 and probably less than 30 media representatives” – omits the fact that not only did Gow admit to emailing the statement to the press, but he also read it to over 30 media representatives over the phone:

Q. Do you recall ever reading the statement to the press or the media over the phone?

A. It's very possible that I would have done so, yes.

See McCawley Decl. at Exhibit 6, Gow Dep. Tr. at 66:2-25.

Q. Do you -- do you remember discussing that with The Guardian?

A. No, I don't. I'm not saying I didn't but I can't recall. You have to bear in mind, if you'd be so kind, that I've been speaking to **over 30 journalists** and media outlets about this, and I can't recall every single -- the detail of every single conversation.

See McCawley Decl. at Exhibit 6, Gow Dep. Tr. at 64:8-14 (emphasis added). Thus, the second sentence of Defendant's Paragraph 18 is also false.

DEFENDANT'S PURPORTED FACTS

19. Among the media representatives were Martin Robinson of the Daily Mail; P. Peachey of The Independent; Nick Sommerlad of The Mirror; David Brown of The Times; and Nick Always and Jo-Anne Pugh of the BBC; and David Mercer of the Press Association. These representatives were selected based on their request—after the joinder motion was filed—for a response from Ms. Maxwell to Ms. Giuffre's allegations in the motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre agrees to the first sentence. The second sentence is a false. Accordingly, there is no record evidence that Gow (or anyone else) “selected” journalists “for a response,” or that there was any selection process whatsoever. To the contrary, Gow testified that anyone who inquired received a reference to the January 2015 defamatory response:

Q. To the extent you can recall or could estimate, how many other emails do you believe you sent bearing that statement that's in Exhibit 2?

A. I really can't remember but certainly more than six and probably less than 30, somewhere in between. Any time there was an incoming query it was either dealt with on the telephone by referring them back to the two statements of March 2011 and January 2015 or someone would email them the statement. So *no one was left unanswered*, broadly, is the -- is where we were. But I can't remember every single person we reached out to.

See McCawley Dec at Exhibit 6 Gow Dep. Tr. at 67:15-68:1 (emphasis added).

DEFENDANT'S PURPORTED FACTS

20. The email to the media members read:

To Whom It May Concern,

Please find attached a quotable statement on behalf of Ms. Maxwell.

No further communication will be provided by her on this matter.

Thanks for your understanding.

Best Ross

Ross Gow

ACUITY Reputation

Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts [sic] that Alan Dershowitz [sic] is involved in having sexual relations with her, which he denies.

Ms. Roberts claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

While Defendant cropped the body text of the email that was sent to news media representatives, she completely omitted the headings and metadata. Ms. Giuffre has put an image of the email below in Ms. Giuffre's Paragraph. *See* GM_00068.

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

DEFENDANT'S PURPORTED FACTS

21. Mr. Barden, who prepared the January 2015 statement, did not intend it as a traditional press release solely to disseminate information to the media. So he intentionally did not pass it through a public relations firm, such as Mr. Gow's firm, Acuity Reputation.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant states: "Mr. Barden, who prepared the statement, did not intend it as a traditional press release solely to dissemination information to the media." Ms. Giuffre contests this statement, and all statements regarding Mr. Barden's beliefs and purposes, and the like.

Further, as stated in detail in Ms. Giuffre's Opposition Defendant's Motion for Summary Judgment, this Court should not even consider the Barden Declaration. Additionally, there is absolutely no record evidence of Barden's intent and the Court should not consider it.

The next sentence states, "So he intentionally did not pass it [the press release] through a public relations firm, such as Mr. Gow's firm, Acuity Reputation." Again, there is zero record evidence to support any assertion of Barden's intent. To the extent that this sentence claims that Barden did not give the statement to Gow, Ms. Giuffre does not dispute it; as described above, Defendant gave the statement to Gow with instructions to publish it. *See* McCawley Dec. at Exhibit 48, RG(UK)_000009, imaged in full at paragraph 81, *supra*. To the extent that this sentence claims that the statement did not pass "through a public relations firm, such as Mr. Gow's firm, Acuity Reputation," Ms. Giuffre disputes that statement. Record documentary evidence and testimony establish that this statement was disseminated through a public relations firm, namely, Ross Gow's firm, Acuity Reputation. *See* McCawley Dec. at Exhibit 6, Gow Dep. Tr. at 109:4-6 ("Q. Approximately how long have you been providing such services? A. Acuity was set up in 2010.").

DEFENDANT'S PURPORTED FACTS

22. The January 2015 statement served two purposes. First, Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of Ms. Giuffre's false allegations. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject Ms. Giuffre's allegations to inquiry and scrutiny. For example, he noted in the statement that Ms. Giuffre's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicized as news."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre objects to this paragraph in its entirety. She disputes that the January 2015 statement "served two purposes," as this statement is wholly unsupported by the record, which Defendant again neglects to cite. Ms. Giuffre also contests the second sentence in which Defendant claims that "Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of Ms. Giuffre's false allegations." First, Ms. Giuffre disputes any statement of Barden's intent as explained above. Second, Ms. Giuffre disputes that there was any "republication" by the press as a matter of law, as explained in her memorandum of law opposing summary judgment, as the press did not "republish" the press statement under New York law. Third, Ms. Giuffre disputes that her allegations are "false," and cites to the following non-exhaustive sampling of evidence to corroborate her allegations against Defendant:

- See McCawley Dec. at Exhibit 16, Sjoberg's May 18, 2016 Dep. Tr. at 8-9, 13, 33-35, 142-143
- See McCawley Dec. at Exhibit 4, Figueroa June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103
- See McCawley Dec. at Exhibit 14, Rinaldo Rizzo's June 10, 2016 Dep. Tr. at 52-60
- See McCawley Dec. at Exhibit 12, Lynn Miller's May 24, 2016 Dep. Tr. at 115
- See McCawley Dec. at Exhibit 13, Joseph Recarey's June 21, 2016 Dep. Tr. at 29-30
- See McCawley Dec. at Exhibit 15, David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36

- Exhibit 2 Excerpted Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570 and 1589
- *See* McCawley Dec. at Exhibit 10, Marcinkova Dep. Tr. at 10:18-21; 12:11-15; etc.
- *See* McCawley Dec. at Exhibit 8, Kellen Dep. Tr. at 15:13-18; 20:12-16; etc. Epstein Dep. Tr. at 116:10-15; 117:18-118:10; etc.
- *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 28, 52-54
- *See* McCawley Dec. at Exhibit 42, Photographs including GIUFFRE007162-007182.
- *See* McCawley Dec. at Exhibit 30, U.S. Attorney Victim Notification Letter GIUFFRE002216-002218
- *See* McCawley Dec. at Exhibit 33, July 2001 New York Presbyterian Hospital Records GIUFFRE003258-003290
- *See* McCawley Dec. at Exhibit 38, Judith Lightfoot psychological records GIUFFRE005431-005438
- *See* McCawley Dec. at Exhibit 28, Message Pad evidencing Defendant arranging to have underage girls and young women come to Epstein's home GIUFFRE001386-001571
- *See* McCawley Dec. at Exhibit 29, Black Book in which Defendant and other household staff maintained a roster of underage girls including [REDACTED]
[REDACTED], who were minors at the time the Palm Beach Police's Investigation of Jeffrey Epstein GIUFFRE001573-00669
- *See* McCawley Dec. at Exhibit 40, Sex Slave books Epstein ordered from Amazon.com at GIUFFRE006581
- *See* McCawley Dec. at Exhibit 32, the folder Defendant sent to Thailand with Ms. Giuffre bearing Defendant's phone number GIUFFRE003191-003192

- See McCawley Dec. at Exhibit 39, the Palm Beach Police Report showing that Epstein used women and girls to collect underage girls for his abuse GIUFFRE005614-005700
- See McCawley Dec. at Exhibit 41, Epstein's Flight Logs showing that Defendant flew with Ms. Giuffre 23 times GIUFFRE007055-007161

Next, Defendant states, "He [Barden] believed these ends could be accomplished by suggesting to the media that, among other things, they should subject Ms. Giuffre's allegations to inquiry and scrutiny." Ms. Giuffre disputes any statement as to Barden's "belief" (*supra*). Ms. Giuffre disputes that the harm to Defendant's reputation could be mitigated by the media's inquiry into and scrutiny of Ms. Giuffre's allegations, because a deeper inquiry would only reveal additional evidence corroborating Ms. Giuffre's allegations, such as the evidence put forth in Ms. Giuffre's opposition memorandum of law and detailed in the bulleted citations, *supra*.

Defendant then states, "For example, he [Barden] noted in the statement that Ms. Giuffre's allegations changed dramatically over time, suggesting that they are 'obvious lies' and therefore should not be 'publicized as news.'" First, Ms. Giuffre disputes that Barden noted anything in the statement, as that is unsubstantiated by the record evidence. Not to do Defendant's work for her, but the closest evidence Defendant has for such a statement is testimony from the Gow deposition wherein Gow speculates that Barden "had a hand in" drafting the press statement, an opinion which may or may not be based on first-hand knowledge. See McCawley Dec. at Exhibit 6, Gow Dep. Tr. at 45:14-17 (Q. Okay. A. And I say, "Thanks, Philip" because I'm aware of the fact that he had a hand, a considerable hand in the drafting.") This is wholly insufficient to show who drafted the passages quoted by Defendant above. Regardless of those passages' original author, it is ultimately Defendant who "noted" anything because it is her statement and she directed that it be sent to the media and public.

Second, Ms. Giuffre disputes that her allegations have changed over time, “dramatically” or otherwise. Third, Ms. Giuffre disputes that the press release “suggest[ed]” that her allegations are “obvious lies,” because Defendant’s press release affirmatively, unambiguously stated that her allegations are “obvious lies” – there is no subtlety, suggestion, or statement of opinion here. *See Giuffre v. Maxwell*, 165 F. Supp.3d 147, 152 (S.D.N.Y. 2016) (“... these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion.”)

DEFENDANT’S PURPORTED FACTS

23. Second, Mr. Barden intended the January 2015 statement to be “a shot across the bow” of the media, which he believed had been unduly eager to publish Ms. Giuffre’s allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that Ms. Giuffre’s allegations were “defamatory.” In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of Ms. Giuffre’s obviously false allegations and the legal indefensibility of their own conduct.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

This paragraph is another purported statement of Defendant’s counsel’s “intent.” Defendant states: “Second, Mr. Barden intended the January 2015 statement to be a ‘shot across the bow’ of the media, which he believed had been unduly eager to publish Ms. Giuffre’s’ allegations without conducting any inquiry of their own.” Not only does Defendant once again refer to Mr. Barden’s intent, but she also mischaracterizes the statement as a “shot across the bow” of the media. The press release did not threaten or give warning to the media in any way whatsoever. *See McCawley Dec. at Exhibit 26, GM_00068, full image copied in Ms. Giuffre’s Paragraph 18, supra.*

Next, Ms. Giuffre disputes the sentence, “Accordingly, in the statement he repeatedly noted that Ms. Giuffre’s allegations were ‘defamatory.’” Barden did not “note” anything in the statement, nor does Defendant cite to any record evidence that he does. Furthermore, Ms. Giuffre

denies that any of her allegations are defamatory in the slightest, as they are all true and substantiated by record evidence (*supra*).

Ms. Giuffre also disputes the sentence, “In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of Ms. Giuffre’s obviously false allegations and the legal indefensibility of their own conduct.” First, Ms. Giuffre objects to any statement of Barden’s intent, as articulated above. Second, Defendant’s conventional press release was in no way any type of “cease and desist letter.” There is no record evidence in support of this claim, and Defendant unsurprisingly cites to none. Third, Ms. Giuffre disputes that any media-recipients would be given to understand “the seriousness with which Ms. Maxwell considered the publication of Ms. Giuffre’s obviously false allegations and the legal indefensibility of their own conduct” by Defendant’s self-serving press release, as that is unsupported by the record. Finally, Ms. Giuffre rejects that her allegations are “obviously false,” a claim which is completely unsupported by record evidence.

DEFENDANT’S PURPORTED FACTS

24. Consistent with those two purposes, Mr. Gow’s emails prefaced the statement with the following language: “Please find attached a quotable statement on behalf of Ms. Maxwell” (emphasis supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to Ms. Giuffre’s December 30, 2014, allegations that would give the media Ms. Maxwell’s response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

Ms. Giuffre disputes that any part of Defendant's press release is "consistent with those two [of Barden's] purposes." Indeed, Ms. Giuffre disputes this and any statement relating to Barden's "purposes," as explained above.

Next, Ms. Giuffre disputes that, "The statement was intended to be a single, one-time-only, comprehensive response – quoted in full – to Ms. Giuffre's December 30, 2014, allegations that would give the media Ms. Maxwell's response." First, Ms. Giuffre disputes this and any statement relating to Barden's "intent" as explained above. Second, Ms. Giuffre disputes that anyone intended the press release to be a one-time-only, comprehensive response. The record evidence says otherwise: Gow repeatedly issued this statement via email and over the phone for months on end.

Next, Defendant states, "The purpose of the prefatory statement was to inform the media-recipients of this intent." First, Ms. Giuffre disputes this and any statement relating to Barden's purpose as explained above. Second, Ms. Giuffre disputes that the press release was to inform the media of **anything**. Defendant issued a press release, instructed them to publish it (by telling them it was "quotable"), *see* McCawley Dec. at Exhibit 48, RG(UK)_000009 (*supra*), and hired a press agent to feed it to the press:

Q. Did Ms. Maxwell retain the services of you or your firm?

A. Yes, she did.

Q. Is it your belief that that agreement was in effect on January 2nd, 2015?

A. Yes.

Q. Do you recall the terms of that agreement?

A. Well, it was a re-establishment of an existing agreement so if we go back to the original agreement, it was to provide public relations services to Ms. Maxwell in the matter of Giuffre and her activities.

See McCawley Dec. at Exhibit 6 Gow Dep. Tr. at 12:19-21; 13:9-16. The record evidence shows that Defendant's intent was for the press to publish her press release: any other interpretation is not only contrary to logic, but unsupported by the record.

DEFENDANT'S PURPORTED FACTS

25. **Ms. Giuffre's activities to bring light to the rights of victims of sexual abuse.** Ms. Giuffre has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed to the portion of Defendant's assertion in bold font. Ms. Giuffre has not engaged in activities to bring attention to herself, rather she has taken action to aid in the prosecution of her abusers, and she seeks to bring light to the rights of victims of sexual abuse.

DEFENDANT'S PURPORTED FACTS

26. Ms. Giuffre created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre created Victims Refuse Silence, Inc., in order to help other sexually trafficked victims find the resources they need to recover and heal. *See*

www.victimsrefusesilence.org.

DEFENDANT'S PURPORTED FACTS

27. The "goal" of Victims Refuse Silence "was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse." Toward this end, Ms. Giuffre has "dedicated her professional life to helping victims of sex trafficking."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed.

DEFENDANT’S PURPORTED FACTS

28. Ms. Giuffre repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

Denied. Ms. Giuffre was approached by numerous media outlets and refused to speak to most of them. Media organizations sought her out; she did not seek them out. *See* McCawley Dec. at Exhibit 35, GIUFFRE003690, email from Sharon Churcher seeking to interview Ms. Giuffre.

DEFENDANT’S PURPORTED FACTS

29. On December 30, 2014, Ms. Giuffre publicly filed an “entirely unnecessary” joinder motion laden with “unnecessary,” “lurid details” about being “sexually abused” as a “minor victim[]” by wealthy and famous men and being “trafficked” all around the world as a “sex slave.”

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

See Ms. Giuffre’s Paragraph 7, *supra*, listing multiple reasons why details were, in fact, necessary.

DEFENDANT’S PURPORTED FACTS

30. The Ms. Giuffre’s alleged purpose in filing the joinder motion was to “vindicate” her rights under the CVRA, expose the government’s “secretly negotiated” “non-prosecution agreement” with Epstein, “shed tremendous public light” on Epstein and “other powerful individuals” that would undermine the agreement, and support the CVRA Ms. Giuffre’s request for documents that would show how Epstein “used his powerful political and social connections to secure a favorable plea deal” and the government’s “motive” to aid Epstein and his “co-conspirators.”

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

See Ms. Giuffre’s Paragraph 7, *supra*, listing multiple purposes of Ms. Giuffre’s lawyers’ filing of the motion.

DEFENDANT'S PURPORTED FACTS

31. Ms. Giuffre has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein's alleged "sex scheme."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Paragraph 52, *infra*, explaining that the context of this statement is misleading.

DEFENDANT'S PURPORTED FACTS

32. **Republication alleged by Ms. Giuffre.** Ms. Giuffre was required by Interrogatory No. 6 to identify any false statements attributed to Ms. Maxwell that were "'published globally, including within the Southern District of New York,'" as Ms. Giuffre alleged in Paragraph 9 of Count I of her complaint. In response, Ms. Giuffre identified the January 2015 statement and nine instances in which various news media published portions of the January 2015 statement in news articles or broadcast stories.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre objects to this paragraph in its entirety, starting with the bolded heading ("Republication alleged by Ms. Giuffre"). There is no "republification" as a matter of law in this case, as explained in Ms. Giuffre's memorandum of law. Accordingly, Ms. Giuffre is not and has not alleged republification. As noted in her objection that, it is Defendant who possesses the knowledge as to where the defamatory statements were published; unsurprisingly, Defendant failed to comply with Ms. Giuffre's discovery requests on the same.

As Defendant already knows, Ms. Giuffre provided a sampling of Defendant's defamatory statements published by the news media, as "identification of an exhaustive responsive list would be unduly burdensome." This, of course, is because Defendant caused her statement to be published in an enormous number of media outlets. Ms. Giuffre's full response to Interrogatory No. 6 is below. As the Court can see, these nine instances were a good-faith effort to provide some samples (as it would be virtually impossible to provide all of them), below. Ms.

Giuffre has also put forth an exhaustive expert report and expert testimony from Jim Jansen regarding the dissemination of Defendant's defamatory press release.

Ms. Giuffre objects because the information interrogatory above is in the possession of Defendant who has failed to comply with her production obligations in this matter, and has failed to comply with her production obligations with this very subject matter. See Document Request No. 17 from Ms. Giuffre's Second Request for Production of Documents to Defendant Ghislaine Maxwell. Maxwell has not produced all "URL or Internet addresses for any internet version of such publication" that she directed her agent, Ross Gow, to send.

Ms. Giuffre further objects because the information requested above is in the possession of Defendant's agent, who caused the false statements to be issued to various media outlets. Ms. Giuffre has not had the opportunity to depose Maxwell's agent Ross Gow; therefore, this answer remains incomplete.

Consequently, Ms. Giuffre reserves the right to modify and/or supplement her responses, as information is largely in the possession of the Defendant and her agent. Ms. Giuffre objects to this interrogatory in that it violates Rule 33 as its subparts, in combination with the other interrogatories, exceed the allowable twenty-five interrogatories. Ms. Giuffre objects to this request because it is in the public domain. Ms. Giuffre also objects in that it seeks information protected by the attorney-client/work product privilege, and any other applicable privilege stated in the General Objections.

Notwithstanding such objections, Ms. Giuffre has already produced documents supplements such responsive documents with the following list of publications. While the identification of an exhaustive responsive list would be unduly burdensome, in an effort to make a good faith effort towards compliance, Ms. Giuffre provides the following examples, which are incomplete based on the aforementioned reasons:

Date	Nature	Publishing Entity	Statement/URL
January 2, 2015	Internet	Ross Gow	<p>Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.</p> <p>Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.</p> <p>Ms. Roberts's claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.</p> <p>Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.</p>
January 2, 2015	Internet	Bolton News	http://www.theboltonnews.co.uk/news/national/11700192_Palace_denies_Andrew_sex_case_claim/
January 3, 2015	Internet	Telegraph	http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html
January 3, 2015	Internet	Daily Mail	http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe.html
January 3, 2015	Internet	Huffington Post	http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims_n_6409508.html

January 4, 2015	Internet	Express	http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew
January 4, 2015	Internet	Jewish News Online	http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/
January 5, 2015	Internet/Broadcast	NY Daily News	http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
January 5, 2015	Internet/Broadcast	AOL UK	http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/

Two newest articles

^[1] <https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/>

^[2] <http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971>

DEFENDANT'S PURPORTED FACTS

33. In none of the nine instances was there any publication of the entire January 2015 statement.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

While there may be certain publications who did not print every word of Defendant's lengthy press release, most publications quoted the most salient, to-the-point parts of Defendant's statement that call Ms. Giuffre a liar. In each of the nine articles listed above, the defamatory statement, as articulated by the Complaint and *as identified by the Court as actionable*, is published. *See Giuffre v. Maxwell*, 165 F. Supp.3d 147, 152 (S.D.N.Y. 2016) ("statements that Giuffre's claims 'against [Defendant] are untrue,' have been 'shown to be untrue,' and are 'obvious lies' have a specific and readily understood factual meaning: that Giuffre is not telling the truth about her history of sexual abuse and Defendant's role, and that some verifiable investigation has occurred and come to a definitive conclusion proving that fact. Second, these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion"). Ms. Giuffre also put forth extensive evidence of the mass distribution of Defendant's defamatory statement to over 66 million viewers through her expert witness Jim Jansen. *See McCawley Dec. at Exhibit 24, Expert Report of Jim Jansen.*

DEFENDANT'S PURPORTED FACTS

34. Ms. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in Ms. Giuffre's response to Interrogatory No. 6, in connection with the media's publication of portions of the January 2015 statement.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre disputes this statement in its entirety, as it is completely devoid of record evidence. In fact, the record establishes the contrary. First, Defendant hired Gow because his

position allowed him to influence the press to publish her defamatory statement. A sampling of Gow's testimony establishes just that:

Q. Did Ms. Maxwell retain the services of you or your firm?

A. Yes, she did.

Q. Is it your belief that that agreement was in effect on January 2nd, 2015?

A. Yes.

Q. Do you recall the terms of that agreement?

A. Well, it was a re-establishment of an existing agreement so if we go back to the original agreement, it was to provide public relations services to Ms. Maxwell in the matter of Giuffre and her activities.

Q. You can answer -- to the extent that anything you testify to is not protected by a privilege.

A. Ms. Roberts first came to my attention on or around March 2011 when I was called into a meeting with Philip Barden and Ms. Maxwell at Devonshires law office, that she had made -- Ms. Giuffre had made extremely unpleasant allegations about Ms. Maxwell's private life. We were -- Acuity Reputation, my firm was called in to protect Ms. Maxwell's reputation, and to set the record straight. That was -- and that work commenced on or around March of 2011.

Q. Does this document fairly depict pages from your -- from Acuity Reputation's website?

A. It does.

Q. Do you see where it says "We manage reputation and forge opinion through public relations, strategic communications and high level networking"?

A. I do.

Q. Is that a true statement?

A. Say it again. Sorry.

Q. Is that a true statement?

A. It is, yes. I wrote that statement.

Q. Okay. Do you see where your website claims that your company has "excellent relationships with the media"?

A. I do.

Q. Is that a true statement?

A. That is true, yeah.

Q. Is it correct that you advertise your “excellent relationships with the media” because your services often include giving communications to the media on behalf of your clients?

A. Yes.

See McCawley Dec. at Exhibit 6 Gow Dep. Tr. at 13:9-16; 15:18-16:3; 109:12-22; 110:16-21; 111:3-7. In addition to testimonial evidence, the proof is also in the result. By using Gow to issue her press release, Defendant caused her statement to be published by numerous major news organizations with wide readership all over the globe. Accordingly, the record evidence shows that Ms. Maxwell, through her agent, had immense control and authority over the media, convincing major news outlets to publish her words based on nothing more than a single email from Gow.

DEFENDANT’S PURPORTED FACTS

35. Ms. Giuffre’s defamation action against Ms. Maxwell. Eight years after Epstein’s guilty plea, Ms. Giuffre brought this action, repeating many of the allegations she made in her CVRA joinder motion.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

Agreed, but noting that the defamation cause of action against Defendant did not accrue until Defendant defamed her in January of 2015, the same year Ms. Giuffre filed suit against Defendant for defamation.

DEFENDANT’S PURPORTED FACTS

36. The complaint alleged that the January 2015 statement “contained the following deliberate falsehoods”:
- (a) That Giuffre’s sworn allegations “against Ghislaine Maxwell are untrue.”
 - (b) That the allegations have been “shown to be untrue.”
 - (c) That Giuffre’s “claims are obvious lies.”

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed. However, in discovery, Defendant was finally forced to produce the complete press release she issued. *See* McCawley Dec. at Exhibit 26, GIUFFRE00068.

DEFENDANT'S PURPORTED FACTS

37. Ms. Giuffre lived independently from her parents with her fiancé long before meeting Epstein or Ms. Maxwell. After leaving the Growing Together drug rehabilitation facility in 1999, Ms. Giuffre moved in with the family of a fellow patient. There she met, and became engaged to, her friend's brother, James Michael Austrich. She and Austrich thereafter rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. Later, they stayed briefly with Ms. Giuffre's parents in the Palm Beach/Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. Although Ms. Giuffre agreed to marry Austrich, she never had any intention of doing so.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did not voluntarily live independently from her parents with her fiancé, rather Ms. Giuffre was a troubled minor child who was not truly engaged prior to meeting Defendant and Epstein. Where Ms. Giuffre lived, and who she lived with, are not relevant to the issues being decided in this action. Again, this is merely a transparent distraction from the case that is actually at issue, and is being used for the sole purpose of inserting conjecture in an effort to distract the Court and ultimately the jury.

Although Austrich testified that he proposed to Ms. Giuffre on Valentine's Day, *see* Austrich at p. 19, Ms. Giuffre was a troubled teen who could not realistically be considered a fiancé in the true sense of the word, nor was she of legal age to marry. In fact, as accurately described by Defendant, Ms. Giuffre never had any intention of marrying Austrich. Giuffre Dep. Tr. at 127:22-128:21. Given that Ms. Giuffre was a child with limited legal capacity at this point, and that she did not have any intention of marrying Austrich, a reasonable person could not assert that Ms. Giuffre was engaged.

DEFENDANT'S PURPORTED FACTS

38. Ms. Giuffre re-enrolled in high school from June 21, 2000 until March 7, 2002. After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, Ms. Giuffre re-enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. On September 20, 2001, Ms. Giuffre then enrolled at Royal Palm Beach High School. A few weeks later, on October 12, 2001, she matriculated at Survivors Charter School. Id. Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. Ms. Giuffre remained enrolled at Survivor's Charter School until March 7, 2002. She was present 56 days and absent 13 days during her time there. Id. Ms. Giuffre never received her high school diploma or GED. Ms. Giuffre and Figueroa went "back to school" together at Survivor's Charter School. The school day there lasted from morning until early afternoon.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies this statement. Either Defendant is blatantly misleading this Court or Defendant simply does not understand how to interpret Ms. Giuffre's school records. The record produced by Defendant (GM0888) is specifically titled "A07. Assignment History," which reflects semester start and end dates per each 180 day school year, not dates that Ms. Giuffre physically enrolled or withdrew from school. *See* McCawley Dec. at Exhibit 27, GM0888.

PANEL: _____ A07. ASSIGNMENT HISTORY YEAR: 16
 T234 Monday May 23, 2016 9:04 am
 STDT: 12870606 ROBERTS, VIRGINIA L SCHL: 3390 GR: 10 ST: I

A ENTRY		WITHDRAWAL		P												E	
C	CD	DATE	OD	CD	DATE	R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	Y
-	R02	101201	---	W26	030702	N	---	02	01	---	3390	SURVIVORS	10	56	31	---	Y
-	R02	092001	---	W02	101101	N	---	02	01	---	2331	ROYAL PALM HIG	10	13	1	---	-
-	EA1	081401	---	W32	092001	Z	---	02	A1	---	2192	WLLNGTN HS ADL	30	---	---	---	-
-	EA1	081600	---	W47	081301	Z	---	01	A1	---	2192	WLLNGTN HS ADL	30	---	---	---	Y
-	EA1	062100	---	W47	081500	Z	---	00	A1	---	2192	WLLNGTN HS ADL	30	---	---	---	Y
-	E01	081699	---	W03	081699	N	---	00	01	---	2331	ROYAL PALM HIG	10	---	---	---	-
-	E01	081998	---	W02	060999	P	---	99	01	---	0581	FOREST HILL HI	09	155	25	---	Y
-	E01	082097	---	W01	061098	R	---	98	01	---	2331	ROYAL PALM HIG	09	147	33	---	Y
-	E01	082097	---	W22	082097	N	---	98	01	---	2191	WELLINGTON HIG	09	---	---	---	-
-	R03	040797	---	W02	061197	P	---	97	01	---	1691	CRESTWOOD MID	08	40	5	---	Y
-	E01	082294	---	DNE	082294	N	---	95	01	---	1703	ROYAL PINES SC	06	---	---	---	-
-	E01	082393	---	W02	061094	P	---	94	01	---	1901	LOXAHATCHEE EL	05	167	13	---	Y
-	E01	082592	---	W01	061193	P	---	93	01	---	1901	LOXAHATCHEE EL	04	176	4	---	Y

While “Grade 30” indicates adult education, Ms. Giuffre’s attendance records indicate that she was ***not*** present in school between 6/21/00-09/20/01 (*see* withdrawal codes W32 and W47).

WITHDRAWAL CODES: ADULT STUDENTS

- **W26** - Any student who withdraws from school to enter the adult education program prior to completion of graduation requirements.
- **W32** - Any adult student who left the class/program to enter another training program.
- **W47** - Any adult student who is procedurally withdrawn at the end of the term or school year who will continue in the class/program the next term or school year.

<http://www.fldoe.org/core/fileparse.php/8861/urlt/0094063-appendb.pdf>

More importantly, Ms. Giuffre’s school transcripts clearly indicate “NO COURSES TAKEN” for the 1999-2000 and 2000-2001 school years. (*See* McCawley Dec. at Exhibit 27, GM_00893.) Ms. Giuffre’s attempt to work and resume school at Survivor’s Charter School as a 10th grader in the 2001-2002 school year was limited to a portion of the school year (10/20/01-03/07/02), and further substantiates Ms. Giuffre’s testimony that she attempted to get away from Epstein’s abuse, along with the following testimony by Figueroa:

- Q: Was there a period of time between 2001 and when she left in 2002 here she was not working for Jeffrey?
- A: Yes.
- Q: What period of time was that?
- A: It was pretty much, like, when she was actually working as a server. Like, basically because we were trying to not have her go back there. Like, she did not want to go back there. And we were trying to just work without needing his money, you know.”

See McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 92-93

- Q: So the thing that Virginia was tired of ... What was it that Virginia was trying to get away from and stop with respect to working at Jeffrey Epstein's house?
- A: To stop being used and abused.

See McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 248

Even still, if the records are correct, which Ms. Giuffre does not concede, the records indicate that Ms. Giuffre's attendance was poor, with 69 days present and 32 days absent out of a required 180 day school year and that she was **not enrolled at the end of the school year** (emphasis added).

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1999-2000 GRADE LEVEL: NA

	GPA	QTY	PTS		GPA	QTY	PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00		
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00		

1999-2000 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 2000-2001 GRADE LEVEL: NA

	GPA	QTY	PTS		GPA	QTY	PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00		
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00		

2000-2001 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
YEAR: 2001-2002 GRADE LEVEL: 10

		SUBJECT	CRSE	G	A	O	CREDIT
T	COURSE#	COURSE TITLE	AREA	FLAG	R	C	N ATT./EARN
1	0500530	PERS,CAR,SCH DEV 4	EL		C	Z N	0.50 0.50
1	1001440	BUS ENG I	EN	J	B	Z N	0.50 0.50
1	1205370	CONSUMER MATH	MA	C	C	Z N	0.50 0.50
1	8300310	WORKPLACE ESSENTIAL	VO		B	Z N	0.50 0.50
1	8301610	WORK EXP 1	VO		F	Z N	0.50 0.00
1	8301650	WORK EXP-OJT	VO		F	Z N	1.00 0.00
CREDIT, TERM:						3.50	2.00

	GPA	QTY	PTS		GPA	QTY	PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00		
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00		

2001-2002 ANNUAL DAYS-PRESENT: 69 ABSENT: 32
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

See McCawley Dec. at Exhibit 27, GM_00893.

Ms. Giuffre's obvious gap in her school attendance, her presence verified by Epstein's pilot on flight logs, and an abundance of witness testimony all corroborate her story that she was that Ms. Giuffre was flying domestic and internationally with Epstein at least 32 times between 12/11/00-07/28/01 and 06/21/02-08/21/02 (Defendant traveling with Ms. Giuffre on 23 of the flights). *See* McCawley Dec. at Exhibits 15 and 41, Pilot, David Rodgers' Dep. Tr. 96:12-166; Rodger's Dep. Ex. 1 (Ms. Giuffre flight dates: 12/11/00; 12/14/00 (GIUFFRE007095); 01/26/01; 01/27/01; 01/30/01 (GIUFFRE007096); 03/05/01: 03/06/01; 03/08/01 x's 2; 03/09/01; 03/11/01 x's 2 (GIUFFRE007097); 03/27/01; 03/29/01; 03/31/01 (GIUFFRE007098); 04/09/01 x's 2; 04/11/01; 04/16/01; 05/03/01; 05/05/01 (GIUFFRE007099); 05/14/01(GIUFFRE007100); 06/03/01 06/05/01; 07/04/01; 07/08/01; 07/11/01 (GIUFFRE007101); 07/16/01; 07/28/01; (GIUFFRE007102); 06/21/02 (GIUFFRE007111); 08/18/02; 08/21/02 (GIUFFRE007112); *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 104: 9-14 (Q: Do you know how long Virginia had been coming over to the house before she started traveling on an airplane with Ghislaine and Jeffrey? THE WITNESS: Not too long. I don't think it was too long after that); *See* McCawley Dec. at Exhibit 37, GIUFFRE004721 (passport application).

DEFENDANT'S PURPORTED FACTS

39. During the year 2000, Ms. Giuffre worked at numerous jobs. In 2000, while living with her fiancé, Ms. Giuffre held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. Her taxable earnings that year totaled nearly \$9,000. Ms. Giuffre cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre disputes this statement. During 2000, Ms. Giuffre shared an apartment with her then boyfriend, James Michael Austrich and his friend, Mario. *See* McCawley Dec. at Exhibit 2, Austrich Dep. Tr. at p. 92. Although Austrich testified that he proposed to Ms. Giuffre on Valentine's Day, *see* Austrich at p. 19, Ms. Giuffre was a troubled teen who could not realistically be considered a fiancé in the true sense of the word nor was she of legal age to marry. While Ms. Giuffre held various jobs in 2000, "[SSA] records do not show the exact date of employment (month and day) because [they] do not need this information to figure Social Security benefits." *See* McCawley Dec. at Exhibit 46, GIUFFRE009176).

The reason that Ms. Giuffre cannot recall two companies listed on her SSA records (Southeast Employee Management Company or Oasis Outsourcing) is simply because they were not her employers. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 470-472. Had Defendant bothered to run a simple google search, she could have ruled them out as being payroll and benefit administration companies. *See* <http://www.oasisadvantage.com/west-palm-beach-peo>; <http://www.progressiveemployer.com/>; <http://www.businesswire.com/news/home/20060501006151/en/Progressive-Employer-Services-Purchases-Southeast-Employee-Management>.

Ms. Giuffre has testified that she believes she worked at Taco Bell, at an aviary, then Mar-a-Lago (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at p. 53, 470). Austrich also testified that Ms. Giuffre worked with him at Taco Bell, as well as a pet store for "over a month" before working at Mar-a-Lago (*See* McCawley Dec. at Exhibit 5, Austrich Dep. Tr. at p. 16, 30, 98). Neither Taco Bell nor the pet store are listed on Ms. Giuffre's SSA records because they were most likely paid through payroll companies. *See* McCawley Dec. at Exhibit 46, GIUFFRE009178. Ms. Giuffre also testified that she volunteered at an aviary where they

eventually put her on their payroll, but paid her very little. Giuffre Dep. Tr. at p. 52; Aviculture Breeding and Research Center taxable earnings for 2000 is \$99.48, *See* McCawley Dec. at Exhibit 46, GIUFFRE009178.

DEFENDANT'S PURPORTED FACTS

40. Ms. Giuffre's employment at the Mar-a-Lago spa began in fall 2000. Ms. Giuffre's father, Sky Roberts, was hired as a maintenance worker at the The Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. Mr. Roberts worked there year-round for approximately 3 years. After working there for a period of time, Mr. Roberts became acquainted with the head of the spa area and recommended Ms. Giuffre for a job there. Mar-a-Lago closes every Mother's Day and reopens on November 1. Most of employees Mar-a-Lago, including all employees of the spa area such as "spa attendants," are "seasonal" and work only when the club is open, i.e., between November 1 and Mother's Day. Ms. Giuffre was hired as a "seasonal" spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre disputes this statement. Defendant cannot simply infer Ms. Giuffre's employment history and claim it to be undisputed. The Mar-a-Lago Club produced 177 pages of records in response to Defendant's subpoena. However, not one page indicated Ms. Giuffre's actual dates of employment, nor whether she was a full-time or seasonal employee. In fact, the only significant record produced was a single, vague chart entry indicating that Ms. Giuffre was terminated in 2000. MAR-A-LAGO 0173, 0176.

TERMINATIONS

LAST NAME	FIRST NAME	
Rinker	Ross	Box #7
Rivera	Pablo	Box #3
Rivera	Eduardo	Box #2
Rivero	Alicia	Box #7
Robbins	Jody	Box #4
Roberts	Virginia	Box #4

Box #1	1998 terms
Box #2	1998 & 1999 terms
Box #3	1999 terms
Box #4	2000 terms
Box #5	2000 terms
Box #6	2001 terms

MAR-A-LAGO 0173

MAR-A-LAGO 0176

Job postings and job descriptions produced by Mar-a-Lago from 2002 and later are irrelevant to Ms. Giuffre's employment because they are from after she worked there. Ms. Giuffre testified that Mar-a-Lago was a summer job. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. 56, 550. In fact, her father, Sky Roberts, testified that he referred his daughter for employment, and she did not get the job through a posting (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72); he drove his daughter to and from work consistent with his full time schedule (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 74); he believes the spa – like the kitchen/dining room - was open to local guests in the summer (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. 138-139); and that his daughter was not attending school when she worked at Mar-a-Lago (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. 134). In addition, Juan Alessi testified that it was “Summer” when Defendant approached Ms. Giuffre at Mar-a-Lago because he specifically remembered “that day I was sweating like hell in the -- in the car, waiting for Ms. Maxwell to come out of the massage.” *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 94:24-95:2.

DEFENDANT'S PURPORTED FACTS

41. **Ms. Giuffre represented herself as a masseuse for Jeffrey Epstein.** While working at the Mar-a-Lago spa and reading a library book about massage, Ms. Giuffre met Ms. Maxwell. Ms. Giuffre thereafter told her father that she got a job working for Jeffrey Epstein as a masseuse. Ms. Giuffre's father took her to Epstein's house on one occasion around that time, and Epstein came outside and introduced himself to Mr. Roberts. Ms. Giuffre commenced employment as a traveling masseuse for Mr. Epstein. Ms. Giuffre was excited about her job as a masseuse, about traveling with him and about meeting famous people. Ms. Giuffre represented that she was employed as a masseuse beginning in January 2001. Ms. Giuffre never mentioned Ms. Maxwell to her then-fiancé, Austrich. Ms. Giuffre's father never met Ms. Maxwell.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies Defendant's false and factually unsupported narrative. In Florida, a person cannot work as a masseuse unless she is “at least 18 years of age or has received a high

school diploma or high school equivalency diploma.” Fla. Stat. § 480.041. Ms. Giuffre was a minor child, under the age of 18, when she was working at Mar-a-Lago as a spa attendant. Giuffre Dep. Tr. at 61:9-61:24. She was approached by Defendant, who told her she could make money as a masseuse, a profession in which Ms. Giuffre had no experience. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12. (Sky Roberts, Ms. Giuffre father, verified Ms. Giuffre’s account that Defendant recruited his daughter to “learn massage therapy.” *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 80:7-19; 84:18 - 85:1).

Ms. Giuffre’s father drove her to Jeffrey Epstein’s house, the address of which was given to her by Defendant. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 117:20-118:1. Ms. Giuffre was lead into the house, and was instructed by Defendant on how to give a massage, during which Epstein and Defendant turned the massage into a sexual encounter, and offered Ms. Giuffre money and a better life to be compliant in the sexual demands of Defendant and Epstein. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18. The minor Ms. Giuffre then began travelling with Defendant and Epstein on private planes and servicing people sexually for money—working not as a legitimate masseuse, but in a position of sexual servitude. *See* McCawley Dec. at Exhibits 5, 1, Giuffre Dep. Tr. at 193:22-194:16; 201:24; 204:24:205:5; Alessi Dep. Tr. at 104:9-104:14.

Epstein’s house manager, Juan Alessi, described Defendant’s methodical routine of how she prepared a list of places ahead of time, then drove to each place for the purpose of recruiting girls to massage Epstein. *See* McCawley Dec. at Exhibit 18, Alessi Dep. Tr. at 34; GIUFFRE000105 at 57-58; GIUFFRE000241-242 at p. 212-213. Alessi also stated that on multiple occasions he drove Defendant to pre-planned places while she recruited girls for

massage. *Id.* He furthered testified that he witnessed Ms. Giuffre at Epstein's house on the very same day that he witnessed Defendant recruit Ms. Giuffre from Mar-a-Lago. *See* McCawley Dec. at Exhibit 18, Alessi Dep. Tr. at 96-98; GIUFFRE000102-103 at p. 48-49.

Johanna Sjoberg, through her sworn testimony, demonstrated that Defendant recruited her in a similar fashion by driving to the college campus where she attended school and approached her to work at Epstein's home answering phones. *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 8-9. Sjoberg testified that she answered phones for one day before Defendant propositioned her to rub feet for \$100.00 an hour. *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 13. The following day, Sjoberg was paired with Defendant's assistant, Emmy Taylor, who provided her with massage training on Epstein. Sjoberg at 13-15. Ms. Giuffre's then-boyfriend, Austrich, testified that he could not recall the name of the person who recruited Ms. Giuffre. However, he did say that she was recruited by someone to work for Epstein as a massage therapist, but that Ms. Giuffre did not have any experience. *See* McCawley Dec. at Exhibit 2, Austrich Dep. Tr. at 34-35, 100-101, 127-128. Neither Ms. Giuffre nor Sjoberg were licensed or trained in massage, but were invited soon after being recruited to travel with Epstein on his private plane to massage him. *See* McCawley Dec. at Exhibit 16, Giuffre Dep. Tr. at 16-17; Sjoberg Dep. Tr. at 13-15; Austrich Dep. Tr. at 109-110; Alessi Dep. Tr. at 104.

DEFENDANT'S PURPORTED FACTS

42. **Ms. Giuffre resumed her relationship with convicted felon Anthony Figueroa.** In spring 2001, while living with Austrich, Ms. Giuffre lied to and cheated on him with her high school boyfriend, Anthony Figueroa. Ms. Giuffre and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with Ms. Giuffre. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa in Ms. Giuffre's presence punched Austrich in the face. Figueroa and Ms. Giuffre fled the scene before police arrived. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This entire statement is wholly irrelevant to the case being tried, and is improperly being inserted to tarnish the record. Ms. Giuffre's dating history as a young teen bears no relation to the allegations made within Ms. Giuffre's complaint against Defendant. As previously stated, Defendant is attempting to muddy the record with nonsensical teen drama in an effort to detract from her salacious sexual abuse of a minor child. Such statements bear no relation to the issues presented through her motion for summary judgment, and should be given weight reflecting the same. As specifically set forth in Ms. Giuffre's objections to designated testimony, the alleged information would be excluded by multiple rules of evidence, and contested by Ms. Giuffre. *See* McCawley Dec. at Exhibit 5, Virginia Dep. Tr., *passim*. Moreover, it was the Defendant who solicited Anthony Figueroa to recruit high school aged girls for Epstein. *See* McCawley Dec. at Exhibit 4 Figueroa Tr. at 200 and 228-229.

DEFENDANT'S PURPORTED FACTS

43. **Ms. Giuffre freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave."** In August 2001 at age 17, while living in the same apartment, Ms. Giuffre and Figueroa hosted a party with a number of guests. During the party, according to Ms. Giuffre, someone entered Ms. Giuffre's room and stole \$500 from her shirt pocket. Ms. Giuffre contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, Ms. Giuffre contacted the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. Again, Ms. Giuffre met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This statement is misleading in several respects and irrelevant. The fact that Ms. Giuffre did contact police on two occasions for two specific purposes and did not take that opportunity to also inform the police of everything else that was going on in her life at the time is immaterial. Defendant implies that anytime someone calls the police for one thing they should tell the police

about every other crime regardless of the relevance to the crime to which the police responded and regardless to the threat to herself should she report on these powerful people. Moreover, as Professor Coonan explained:

Popular understandings of the term “sex slave” might still connote images of violent pimps, white slavery, or of victims chained to a bed in a brothel in the minds of some people. To call Ms. Giuffre a victim of sex trafficking would however very accurately convey the reality that she along with a great many other victims of contemporary forms of slavery are often exploited by the “invisible chains” of fraud and psychological coercion.

See McCawley Dec. at Exhibit 23, Coonan Expert Report at 20. Ms. Giuffre specifically testified that she was fearful of Defendant and Epstein, and, accordingly, she would not have reported her abusers. She also knew that Epstein had control over the Palm Beach Police. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 240:3-241:2.

DEFENDANT’S PURPORTED FACTS

44. **From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Ms. Giuffre.** Flight logs maintained by Epstein’s private pilot Dave Rodgers evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Ms. Giuffre, between August 2001 and September 2002. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights. For substantially all of thirteen months of the twenty-two months (from November 2000 until September 2002) that Ms. Giuffre lived in Palm Beach and knew Epstein, Epstein was traveling outside of Florida unaccompanied by Ms. Giuffre. During this same period of time, Ms. Giuffre was employed at various jobs, enrolled in school, and living with her boyfriend.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

The flight logs produced in this matter provide substantive evidence of Ms. Giuffre’s travel while in the control of Defendant and Epstein, but are clearly incomplete. Moreover, Ms. Giuffre also was flown by Defendant on commercial flights. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 155:5-11. Ms. Giuffre disputes Defendant’s statement to the contrary, as reliance upon incomplete records to prove that Ms. Giuffre was not in fact in the presence of

Defendant and Epstein is insufficient. Ms. Giuffre incorporates additional details contained in Response #38 and #46 herein.

Ms. Giuffre's obvious gap in her school records, her presence verified by Epstein's pilot on flight logs, and witness testimony, corroborate her story that she was traveling with Defendant and Epstein. In fact, flight logs and pilot testimony clearly prove that Ms. Giuffre was flying domestic and internationally with Epstein at least 32 times between 12/11/00-07/28/01 and 06/21/02-08/21/02 (Defendant traveling with Ms. Giuffre on 23 of the flights).

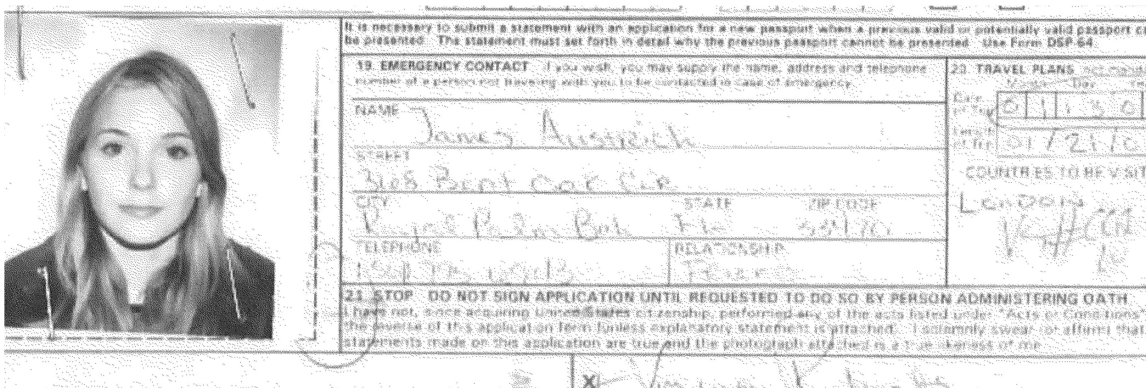
As Defendant acknowledges in her own statement #44, flight records are incomplete. There were several pilots and co-pilots that flew Epstein and Maxwell (Lawrence "Larry" Visoski, David (Dave) Rodgers, Bill Hammond, Pete Rathgeb, Gary Roxburgh, and Bill Murphy) in multiple aircrafts (JEJE, Inc. Aircraft # N908JE – Type B-727-31, and Hyperion Air, Inc. Aircraft # N909JE – Type G-1159B). Yet, only one pilot, David Rodger's produced flight records. See McCawley Dec. at Exhibit 41, David Rodger's Flight Log, GIUFFRE007055- GIUFFRE007161. In addition, many of the girls recruited by Defendant routinely traveled on commercial flights for the purposes of providing massages to Epstein or guests at Epstein's New York, New Mexico, or U.S. Virgin Island homes. See McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 27.

As thoroughly depicted below, Ms. Giuffre's passport application, travel records and witness testimony clearly demonstrate flight logs are incomplete because only one pilot kept a log, and Ms. Giuffre also flew commercially while she worked for Defendant and Epstein. For example, on December 11, 2000, while underage, Ms. Giuffre appears on Rodger's flight log (flight #1433) traveling with Epstein, Maxwell and Emmy Taylor from PBI (Palm Beach, FL) to TEB (Teterboro, NJ) then on December 14, 2001 (#1434) continues traveling with Epstein and

Maxwell to TIST (U.S. Virgin Islands); however, there is no flight records of Ms. Giuffre's return to Palm Beach. *See* McCawley Dec. at Exhibit 15, *see* McCawley Dec. at Exhibit 41, Rodger's Dep. Ex. 1 at GIUFFRE007095; see also Rodger's Dep. Tr. 96-98 ("Q: And do you know how Jeffrey Epstein, Ghislaine Maxwell, Adam Perry Lang, and Virginia get off of St. Thomas or leave the island? A: No. I do not. Probably a charter, I'm guessing.").

11	"	"	PBI	TEB	1433	JE, GM, CT, VIRGINIA
14	"	"	TEB	TIST	1434	JE, GM, AP, VIRGINIA
14	"	"	TIST	PBI	1435	REPOSITION FOR OPS 2 + TLAS
2001 JAN 13	"	"	PBI	PBI	1436	TLAS CERTIFICATION

On January 12, 2001, at Defendant's directive, Ms. Giuffre applied for a Passport to travel with them internationally. *See* McCawley Dec. at Exhibit 37, GIUFFRE004721, passport application listing travel plans to London; flight logs subsequently lists Ms. Giuffre traveling to London with Defendant, Epstein and others).



It is necessary to submit a statement with an application for a new passport when a previous valid or potentially valid passport can be presented. The statement must set forth in detail why the previous passport cannot be presented. Use Form DSP-64.

19. EMERGENCY CONTACT. If you wish, you may supply the name, address and telephone number of a person(s) traveling with you to be contacted in case of emergency.

NAME: James Austrich
 STREET: 308 Brent Oak Cir
 CITY: Palm Beach, FL
 STATE: FL
 ZIP CODE: 33480
 TELEPHONE: 561-833-1000
 RELATIONSHIP: Father

20. TRAVEL PLANS. Not mandatory. Date of trip: 01/13/01
 Length of trip: 01/21/01
 COUNTRIES TO BE VISITED: LONDON, UK
 Visa #/Country: V-#/UK

21. STOP. DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH. I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" the reverse of this application form. Unless explanatory statement is attached. I solemnly swear (or affirm) that statements made on this application are true and the photograph attached is a true likeness of me.

On January 26, 2001, while underage, Ms. Giuffre appears on Rodger's flight log (flight #1444) traveling with Epstein, Maxwell and Emmy Taylor from TEB (Teterboro, NJ) to PBI (Palm Beach, FL); however, there is no flight record indicating how Ms. Giuffre got to New York. On January 27, 2001 (#1445) continues traveling with Epstein, Maxwell and Emmy Taylor from PBI (Palm Beach) to TIST (U.S. Virgin Islands) returning from TIST (U.S. Virgin

Islands) four days later on January 30, 2001. See McCawley Dec. at Exhibit 15, Rodger's Dep.

Ex. 1 at GIUFFRE007096; Rodger's Dep. Tr. at 100-102.

26	"	"	TEB	PBE	1444	JG, GM, ET, VIRGINIA ROBERTS
18	C172	N1446V	PBE LNA	PBE LNA		C172 VOUT PETE SORENSON
18	"	"	LNA	LCQ		B727 CLOSING N505LS
19	"	"	LCQ	MCO		JONATHAN MAND - INSTRUMENT COMPETENCY CHECK - SATISFACTORY
19	"	"	MCO	LNA		
22	G1159B	N908JC	PBE	TIST	1445	JG, GM, ET, VIRGINIA ROBERTS
30	"	"	TIST	PBE	1446	JG, GM, ET, VIRGINIA ROBERTS

On March 5, 2001 Ms. Giuffre, Maxwell, Epstein, Emmy Taylor traveled together internationally (flight #1464) leaving PBI (West Palm Beach) to CYJT (Stephenville, Canada); then on March 6, 2001 (#1465) they continued on to LFPB (Paris, France) with a layover for three days. On March 8, 2001, other passengers, including one unidentified female, joined them on flights # 1466-1467 (from LFPB (Paris, France) - LGGR (Granada, Spain) eventually landing in EGGW (London, England) on March 11, 2001, where she was then introduced to and lent out to Prince Andrew. See McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007097; Rodger's Dep. Tr. at 104-114.

2001	From	To	Flown No.	Maneuvers, Endorsements
21	B-727-200	DFW	DFW	RUNWAY STABILIZER, MANUAL GEAR EXTENSION, RTO BRAKING, BRAKES RELEASE, STALLS, SINGLE ENGINE APPROACHES, RTO, STABILIZER CHECK RIDE
22	"	MGM	MGM	
23	"	"	"	
23	C-421B	DFW	ADS	JONATHAN MAND - HIGH DENSITY APPROACHES, STOPS, etc.
23	"	ADS	PNS	JONATHAN MAND - SID, DEPARTURE MANEUVERS, PERFORMANCE CHARTS
23	"	PNS	PBE	JONATHAN MAND - LOW COMMUNICATIONS PROCEDURES, WEATHER, etc.
3	"	PBE	LCQ	KRISTY ROGERS - CLIMB, DESCENT, STRAIGHT & LEVEL FLIGHT
3	"	LCQ	LAL	KRISTY ROGERS - CLIMB, DESCENT, STRAIGHT & LEVEL FLIGHT
3	"	LAL	PBE	KRISTY ROGERS - CLIMB, DESCENT, etc.
5	G-1159B	PBE	CYJT	1464 JG, GM, ET, VIRGINIA ROBERTS
6	"	CYJT	LFPB	1465 JG, GM, ET, VR
6	"	LFPB	LGGR	1466 JG, GM, ET, VR, ALBERTO + LINDA PENO LEGAR, PEARSON, LSGOR, etc.
6	"	LGGR	GMTT	1467 JG, GM, ET, VR, ALBERTO + LINDA PENO LEGAR, etc.
9	"	GMTT	EGGW	1468 JG, GM, ET, VR
11	"	EGGW	BGR	1469 JG, GM, ET, VR
11	"	BGR	TEB	1470 JG, GM, ET, VR

See also photo of Ms. Giuffre, Maxwell and Prince Andrew in London.

GIUFFRE007167; see also Figueroa Dep. Tr. at 251.



Ms. Giuffre, Epstein, Maxwell, and Taylor remained in London for three days until departing on March 11, 2001 (#1469), stopping in BGR (Bangor, Maine) before departing (#1470) back to TEB (Teterboro, NJ); however, there is no flight record of Ms. Giuffre's return to Palm Beach. See Rodger's Dep. Ex. 1 at GIUFFRE007097; Rodger's Dep. Tr. at 104-114.

27	G-1159A	N909JE	PBI	TEB	1478	JE, GM, EP, NR, 2 FGMAGS, BARN RGR
29	"	"	TEB	SAF	1479	JE, GM, AP, UR, BK, MARVEN MENSKY
31	"	"	SAF	PBI	1480	JE, GM, AP, UR, NADIA BJORLIN, HENRY JARCEK
APR 1	"	"	PBI	LCG	1481	JE, GM, AP

On March 27, 2001, while underage, Ms. Giuffre, Maxwell, Epstein, Emmy Taylor, two unidentified females and others traveled together (#1478) from PBI (Palm Beach) to TEB (Teterboro, NJ); then three days later, on March 29, 2001, continued on (#1479) to SAF (Santa Fe, NM), returning to PBI (Palm Beach, FL) with Nadia Bjorlin (#1480) on March 31, 2001. See McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007098; Rodger's Dep. Tr. at 119-125.

A few glaring examples of how Ms. Giuffre's travel records are incomplete is that Ms. Giuffre traveled from ADS (Addison, Texas) on May 3, 2001 (#1501) to SAT (San Antonio, Texas); then departs SAT (San Antonio, Texas) on May 5, 2001 (#1502) to PBF (Pine Bluff, AR) but there is no record produced that explains how Ms. Giuffre arrived in Addison, Texas or how she returned to Palm Beach from Pine Bluff, AR. Although Epstein's plane appears to have originated from Palm Beach on April 23, 2001, Ms. Giuffre's name doesn't appear on the log. *See* Rodger's Dep. Ex. 1 at GIUFFRE007099; Rodger's Dep. Tr. at 130-132 ("Q: Do you know how Virginia Roberts got to Addison, Texas? A: No. ... Q: Went to Addison and picked up Virginia Roberts? A: It looks like it.").

Another prime example of how incomplete Ms. Giuffre's travel records are is on May 14, 2001. While Ms. Giuffre appears on flight #1506 with Epstein, Maxwell, Emmy Taylor and others (including one unidentified female) from TIST (U.S. Virgin Islands) to TEB (Teterboro, NJ), there is no record produced explaining how Ms. Giuffre arrived to the U.S. Virgin Islands or where she stayed when she landed in New York. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007100; Rodger's Dep. Tr. at 132-133 ("Q: What were the other possible avenues back in those days for Jeffrey Epstein, Ghislaine Maxwell to travel to the Virgin Islands? A: They could have done a charter, possibly.") (*Id.* at 134-135 "Q: All right. So at some point in time, between May 7th and May 14th – A: Uh-huh. Q: -- somebody flies the Gulfstream to the Virgin Islands. A: Correct. Q: And who would that be? A: Larry Visoski and I don't know who the other person would have been."); *Id.* at 136 ("Q. Do you know where Virginia Roberts went during that time after she landed in Teterboro on the 14th? A. I do not.")

14	1590	N904JG	TIST	TEB	1506	JG, GM, ET, BK, VR 1 female
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On June 3, 2001, Ms. Giuffre travels from PBI (Palm Beach) to TIST (U.S. Virgin Islands) on flight #1510 for three days; then, on June 5, 2001, continues on flight #1511 to TEB (Teterboro, NJ); however, there is no record of Ms. Giuffre returning to Palm Beach. *See* Rodger's Dep. Ex. 1 at GIUFFRE007101; Rodger's Dep. Tr. at 136-137.

6-1	G-1159B	N909JC	TEB	PBI	1501	JG, GM, ET, AP, BANU KUCUK ROYLU	1/1
3	"	"	PBI	TIST	1510	JG, VIRGINIA ROBERTS, BANU KUCUK ROYLU	1/1
5	"	"	TIST	TEB	1511	JG, VR, BK	1/1
8	"	"	TEB	CYUL	1512	JG, GM, NAOMI CAMPBELL, REBECCA WISSE, ANNA LAVALLER, ANNA MOLEB, DAVID GONZALEZ	1/1
12	"	"	CYUL	TEB	1513	REPOSESTON (AP, BLIND AND DOLT)	1/1
12	"	"	TEB	PBI	1514	JG	1/1
13	"	"	PBI	TEB	1515	JG, CAROL	1/1
15	"	"	TEB	PBI	1516	JG, GM, SHERRAN, CAROLYN, 1 FEMALE	1/1
18	"	"	PBI	TEB	1517	JG, GM, 1 FEMALE	1/1
22	"	"	TEB	LFPD	1518	JG, GM, CRYSTAL WASHIG, EXOTERNA GRINGA	1/1
23	"	"	LFPD	LFMN	1519	JG, GM, 1 FEMALE	1/1
25	"	"	LFMN	LIML	1520	JG, GM, 1 FEMALE	1/1
26	"	"	LFML	LFPB	1521	JG, GM	1/1
28	"	"	LFPB	LPAZ	1522	JG, GM, ET, ED TUTTLE	1/1
28	"	"	LPAZ	TIST	1523	JG, GM, ET, ED TUTTLE	1/1
JUL 4	"	"	TIST	PBI	1524	JG, AP, VR, 1 FEMALE	1/1
8	"	"	PBI	TEB	1525	JG, GM, ET, AP, VR, SHERRAN CAMPBELL, GARY REYNOLDS, GARY ROSENBERG	1/1
11	"	"	TEB	CPS	1526	JG, GM, ET, VR	1/1

Then, on July 4, 2001, Ms. Giuffre reappears on flight #1524 with Epstein and an unidentified female leaving TIST (U.S. Virgin Islands) to return to PBI (Palm Beach); however, there is no flight record that reflects how Ms. Giuffre got to the U.S. Virgin Islands. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007101; Rodger's Dep. Tr. at 138-139 ("Q. And do you know how Virginia Roberts got to the Virgin Islands? A: No. Q. Is there any -- is it possible that the Cessna took her or the Boeing took her? Or any other aircraft that is owned by Jeffrey? A: No, I would -- if I had to guess, I would guess the airlines.")

Again, on July 8, 2001, Ms. Giuffre appears on flight #1525 with Epstein, Maxwell, Emmy Taylor and others including an unidentified female departing PBI (Palm Beach) to TEB

(Teterboro, NJ). Four days later, on July 11, 2001, Ms. Giuffre, Epstein and Maxwell continue on (#1526) to CPS (Cahokia-St. Louis, Illinois) which was a stop due to a mechanical delay on the way to Santa Fe, NM; however, there is no flight record that reflects how Ms. Giuffre returned home to Palm Beach. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007101; Rodger's Dep. Tr. 139-141 ("Q: And then three days later, you leave out of Teterboro to CPS? A: Yes. Q: Where is that? A: That is St. Louis, actually it is Cahokia, Illinois, across the river from St. Louis. Q: Who are your passengers? A: Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Virginia Roberts. We were actually en route to Santa Fe. We had a mechanical problem. We had to go into there for maintenance.")

On July 16, 2001, Ms. Giuffre appears on flight #1528 with Epstein, Maxwell and Emmy Taylor from SAF (Santa Fe, NM) to TEB (Teterboro, NJ); however, Ms. Giuffre's flight to Santa Fe, NM is missing from the records. In addition, on July 28, 2001, Ms. Giuffre reappears on the flight log (#1531) returning with Epstein from TIST (U.S. Virgin Islands) to PBI (Palm Beach); however, there is no record of Ms. Giuffre's flight to the U.S. Virgin Islands. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007102; Rodger's Dep. Tr. 142.

2001			From	To		
JUL 11	G-1159B	N989JE	CPS	SAF	1527	REPOSITION-PILOT STAFFIC LEAK GARY ROBERTS GARY ROBERTS
16	"	"	SAF	TEB	1528	JE, ET, GM, VR ROBERTS
23	"	"	PBE	TIST	1529	JE, STEWART LEWIS
28	"	"	TIST	PBE	1531	JE, VIRGINIA ROBERTS

On June 21, 2002, Ms. Giuffre appears on flight #1570 with Epstein, Maxwell, Sarah Kellen, Cindy Lopez and Jean Luc Brunel from PBI (Palm Beach, FL) to MYEF (George Town, Bahamas); however, there is no record of Ms. Giuffre returning to Palm Beach. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007111; Rodger's Dep. Tr. 161-162 ("Q:

Virginia Roberts was taken to the Bahamas. Do you know where she went from there? A. I do not.”)

2002			From	To	From No.	maneuvers, endorsements
JUN						
8	B-727-31H	N908JC	EIDW	JFK	111	JE, GM, SK
8	"	"	JFK	PBI	112	JE, SK
12	G-1159B	N909JC	PBI	PBI	1567	GMU FLIGHTS-SEAN RELEY, GRIE LARSEN
14	B-727-31H	N908JC	PBI	BOS	113	REPOSITION
14	"	"	BOS	TEST	114	JE, SK, CINDY LOPEZ, LAURA HINES
16	"	"	TEST	JFK	115	JE, GM, SK, CINDY LOPEZ, LAURA HINES
19	G-1159B	N909JC	PBI	TEB	1568	REPOSITION
19	"	"	TEB	PBI	1569	JE, GM, SK, CINDY LOPEZ
21	"	"	PBI	MYEF	1570	JE, GM, SK, CL JUAN LUC BRUNO, VIRGENIA ROBERTS
21	"	"	MYEF	PBI	1571	REPOSITION
23	"	"	PBI	MYEF	1572	REPOSITION
23	"	"	MYEF	TEB	1573	JE, GM, SK, CL JUAN LUC BRUNO, VIRGENIA ROBERTS
23	"	"	TEB	PBI	1574	REPOSITION
AUG						
4	G-1159B	N909JC	PBI	MVY	1583	JE, 1 FEMALE
4	"	"	MVY	BED	1584	JE, 1 FEMALE
4	"	"	BED	TEB	1585	JE, 1 FEMALE
5	"	"	TEB	SAF	1586	JE, SK, 2 FEMALE
6	C-172XP	N739SP	ACG	ACG		172 CHECK OUT
6	206L3	N474AW	ZORRO	ACG		
15	B-727-31H	N908JC	JAX	JAX	126	C-CHECK FLIGHT TEST
16	"	"	JAX	PBI	127	RETURN FROM C-CHECK
17	G-1159-B	N909JC	SAF	TEB	1589	JE, GM, SK, CINDY LOPEZ, VIRGENIA ROBERTS, EDUARDO ALFREDO MARGARETA, MELISSA SHERMAN
18	"	"	TEB	PBI	1590	JE, VIRGENIA ROBERTS, 1 FEMALE

On August 17, 2002, Ms. Giuffre appears on flight #1589 with Epstein, Maxwell, Sarah Kellen, Cindy Lopez and others from SAF (Santa Fe, NM) to TEB (Teterboro, NJ); Ms. Giuffre returns to PBI (Palm Beach, FL) on August 18, 2002 with Epstein and one unidentified female (#1590). See McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007112; Rodger's Dep. Tr. 165 ("Q: Do you know how Virginia Roberts got to Santa Fe? A: No.")

From September 29, 2002 through October 19, 2002, Defendant and Epstein sent Ms. Giuffre on a commercial flight to Thailand for massage training and provided her with all accommodations. *See* McCawley Dec. at Exhibit 43, Giuffre007411-Giuffre007432.

DEFENDANT'S PURPORTED FACTS

45. **Ms. Giuffre and Figueroa shared a vehicle during 2001 and 2002.** Ms. Giuffre and Figueroa shared a '93 white Pontiac in 2001 and 2002. Ms. Giuffre freely traveled around the Palm Beach area in that vehicle. In August 2002, Ms. Giuffre acquired a Dodge Dakota pickup truck from her father. Figueroa used that vehicle in a series of crimes before and after Ms. Giuffre left for Thailand.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre and Tony Figueroa did not share a vehicle during 2001 and 2002. Instead, Figueroa borrowed Ms. Giuffre's car while she was traveling with Defendant and Epstein. Figueroa testified that he "got to take the car, because she was going somewhere else in the world and did not need it, so..." Figueroa Dep. Tr. At 89-90.

In fact, Ms. Giuffre was frequently traveling with Defendant and Epstein. *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 9-14 (stating that Virginia started traveling on an airplane with Ghislaine and Jeffrey "not too long" after she started going over to the house). Figueroa further testified that Virginia "would normally go about two weeks out of every month" with Epstein. Figueroa Dep. Tr. at 90. He further stated, "Pretty much every time I took her there, it was always to his mansion. I picked her up one time -- maybe it was a couple of times --from the jet stream place. But pretty much every single time it was at the hou- -- at the mansion." *Id.* Moreover, Ms. Giuffre testified she purchased a car from the \$10,000 payment she received from Epstein after she was forced to have sex with Prince Andres in London at Defendant's home when Ms. Giuffre was a minor. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 120:1-20.

DEFENDANT’S PURPORTED FACTS

46. **Ms. Giuffre held a number of jobs in 2001 and 2002.** During 2001 and 2002, Ms. Giuffre was gainfully employed at several jobs. She worked as a waitress at Mannino’s Restaurant, at TGIFriday’s restaurant (aka CCI of Royal Palm Inc.), and at Roadhouse Grill. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM).

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

This statement is laughable. Ms. Giuffre was hardly gainfully employed during a time period in which she was trying to escape from the grip Epstein and Maxwell had on Ms. Giuffre. While Social Security provides that she earned nominal amounts of earning statements for 2001 and 2002, the records do not indicate the month or quarter of the year’s work. *See* McCawley Dec. at Exhibit 46, GIUFFRE009176. For a brief period, Ms. Giuffre attempted to go back to school to earn her GED, and tried unsuccessfully to hold down waitressing jobs. *See* McCawley Dec. at Exhibit 27, GIUFFRE009179.

For example, in 2001, Ms. Giuffre earned \$212.00 as a waitress working “briefly” at Mannino’s Restaurant. (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 472). In 2002, Ms. Giuffre earned \$403.64 at CCI of Royal Palm Beach working there (TGI Fridays) for a “short time period.” (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 473). Then, Ms. Giuffre worked at Roadhouse grill until about March 2002 earning \$1,247.90 (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 474).

EMPLOYER NUMBER: 65-0241353
 MANNINOS INC
 MANNINOS RESTAURANT
 12793 B W FOREST HILL BLVD
 WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					\$212.00

EMPLOYER NUMBER: 06-1587035
 CCI OF ROYAL PALM INC
 % ROBERT FURR TTEE
 2255 GLADES RD STE 337-W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$403.64

EMPLOYER NUMBER: 65-0367604
 ROADHOUSE GRILL INC
 ROBERT C FURR TTEE IN BANKRUPTCY
 2255 GLADES RD STE 337W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,247.90

EMPLOYER NUMBER: 65-0915938
 MARC PINKWASSER DVM PA
 13860 WELLINGTON TRCE STE 31
 WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,561.75

GIUFFRE009179.¶

According to Dr. Pinkwasser's records, Ms. Giuffre's also received payroll checks for weeks ending 04/22/02-06/04/02 earning a total of \$1,561.75. (*See* McCawley Dec. at Exhibit 47, GIUFFRE009203).

4/22/02 Courtyard Animal Hospital
 5/6/02 Courtyard Animal Hospital
 5/6/02 Courtyard Animal Hospital
 5/20/02 Courtyard Animal Hospital
 6/4/02 Courtyard Animal Hospital

Not long after Ms. Giuffre losing her job at Courtyard Animal Hospital, GIUFFRE00009211, flight records show that Ms. Giuffre was soon back under Epstein's control traveling with Maxwell to the Bahamas, Santa Fe, New Mexico then New York, *see* McCawley Dec. at Exhibit 47, GIUFFRE007111-GIUFFRE007112.

DEFENDANT'S PURPORTED FACTS

47. **In September 2002, Ms. Giuffre traveled to Thailand to receive massage training and while there, met her future husband and eloped with him.** Ms. Giuffre traveled

to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the airport. While there, she initially contacted Figueroa frequently, incurring a phone bill of \$4,000. She met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Mr. Figueroa's deposition in this matter in May 2016.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did travel to Thailand to receive massage training in September 2002. However, Defendant has inaccurately told only part of the story. Defendant has conveniently left out certain key facts, which includes the fact that Ms. Giuffre was given an assignment from Defendant and Epstein that she had to recruit another underage girl from Thailand, and bring that young girl back to Epstein. *See* McCawley Dec. at Exhibit 43, GIUFFRE 003191. The document Ms. Giuffre was give directs her to "call Ms. Maxwell." *See* McCawley Dec. at Exhibit 32, GIUFFRE003191. It is not disputed by Defendant or Epstein, that Ms. Giuffre was expected to return to Epstein and Maxwell upon completion of her massage training and assignment. It is undisputed by Ms. Giuffre that she did not return to Defendant and Epstein, but instead escaped clear across the world to Australia where she remained in hiding from Defendant and Epstein for several years.

DEFENDANT'S PURPORTED FACTS

48. **Detective Recarey's investigation of Epstein failed to uncover any evidence that Ms. Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography.** Joseph Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Jeffrey Epstein. That investigation commenced in 2005. Recarey worked only on the Epstein case for an entire year. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein. Detective Recarey's investigation revealed that not one of the alleged Epstein victims ever mentioned Ms. Maxwell's name and she was never considered a suspect by the government. None of Epstein's alleged victims said they had seen Ms. Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. Indeed, none of Epstein's alleged victims ever reported to the government they had met or spoken to Ms. Maxwell. Maxwell was not

seen coming or going from the house during the law enforcement surveillance of Epstein's home. The arrest warrant did not mention Ms. Maxwell and her name was never mentioned before the grand jury. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. Detective Recarey, when asked to describe "everything that you believe you know about Ghislaine Maxwell's sexual trafficking conduct," replied, "I don't." He confirmed he has no knowledge about Ms. Maxwell sexually trafficking anybody. Detective Recarey also has no knowledge of Ms. Giuffre's conduct that is subject of this lawsuit.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This statement is false. Detective Recarey knew that Maxwell was involved in the illegal sexual activities at Epstein's house. He wanted to speak to her, but Maxwell did not return his calls. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 28:23-29:10. Detective Recarey concluded that Defendant's role was to procure girls for Epstein. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 29:16-29:20. In the execution of the search warrant, stationary was found in the home bearing Maxwell's name, and notes were written by house staff to Maxwell. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 45:13-25; *Id.* at 83:3-83:15; see also Message Pads, GIUFFRE 001412, 001418, 001435, 001446, 001449, 001453, 001454. A key piece of evidence in the investigation were message pads uncovered in trash pulls, and from inside the residence during the search warrant. Those message pads revealed numerous calls left at the house for Maxwell, indicating she was staying in the house during the days when Epstein was engaging in illegal sex acts with minors.

Additionally, a walk through video taken during the execution of the search warrant revealed photos of topless females at the home, and there was even a photograph of Maxwell naked hanging in the home. The house staff who were deposed in the civil cases each testified to Maxwell being the boss in charge of everyone in the house. *See* McCawley Dec. at Exhibits 1,

19, 21, Banasiak Dep. Tr. at 8:21-9:16; 14:20-15:6; Alessi Dep. Tr. at 23:11-23:20; Rodriguez Dep. Tr. at 169:1-169:4.

Rodriguez, the house butler from 2004 through 2005, a time period that revealed daily sexual abuse of underage females, testified that Maxwell kept a list of the local girls who were giving massages at her desk, and that Maxwell kept nude photos of girls on her computer. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 238:4-238:22; 302:19-303:10; 306:1-306:24. Recarey testified that when the search warrant was executed, the house had been sanitized and the computers removed from the home. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 72:25-73:15. Banaziak testified that the computers were removed by Adriana Ross, another employee who answered to Maxwell. *See* McCawley Dec. at Exhibit 19, Banaziak Dep. Tr. at 54:7-22.

The record is replete with testimony demonstrating that Maxwell recruited Virginia, and recruited other females, who in turn recruited other females, all who were sexually abuse by Epstein; meaning, it is undisputed that Maxwell started the top of the pyramid of local Palm Beach girls who were all eventually identified as victims. *See, e.g.,* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 34:19-35:3; 98:5-98:12; 104:15-104:23. The co-conspirator who maintained direct contact with the many underage victims was Sarah Kellen, whose sole responsibility was to schedule underage girls to visit Epstein for sex. Sarah reported directly to Maxwell. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 26:10-26:20. On the day when the search warrant was executed, the house maid, Ruboyo was scheduled to report to the house that day at 8 am; however, she received a call from Maxwell telling her not to go. *See* McCawley Dec. at Exhibit 20, Rabuyo Dep. Tr. at 81:20-82:25. Maxwell orchestrated and ran the entire sex

trafficking scheme from a high level, and insulated herself from most of the underage girls who were being paid for sex.

Tony Figueroa, Ms. Giuffre's ex-boyfriend, did testify that Maxwell personally requested that he find and bring girls to Epstein for sex once Ms. Giuffre had escaped, and that when he brought the girls Maxwell interacted with them. *See* McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 200:6-18; 228:23-229:21. Rodriguez testified unequivocally that Maxwell was "the boss" and that she knew everything that was going on. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. 169:1-169:4.

DEFENDANT'S PURPORTED FACTS

49. **No nude photograph of Ms. Giuffre was displayed in Epstein's home.** Epstein's housekeeper, Juan Alessi, "never saw any photographs of Virginia Roberts in Mr. Epstein's house." Detective Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This is false. Nude photographs were displayed throughout Epstein's home. Furthermore, Alfredo Rodriguez testified to Maxwell having pornography on her computer. Rodriguez Dep. Tr. 150:10-17; 306:1-306:24. He also testified to there being a collage of nude photos in Epstein's closet. *Id.* 253:14-254:18. That collage was eventually taken into evidence by Detective Recarey, who testified to that fact in his deposition. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 73:19-73:24. And those photos are still in the possession of the FBI or US Attorney's Office. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 74:2-74:7.

Numerous other people have testified about nude photographs being on display in the home including Ronaldo Rizzo, who visited the home on numerous occasions and who was reprimanded by Maxwell herself for looking at the nude photos. *See* McCawley Dec. at Exhibit 14, Rizzo Dep. Tr. at 25:19-26:20. Additionally, the search warrant video, taken at a time when

the house had already been sanitized, revealed photographs of nudity displayed, including a photograph of Maxwell herself in the nude. *See* McCawley Dec. at Exhibit 44, Search Warrant Video attached to the Deposition of Recarey.

Johanna Sjoberg testified that the Defendant bought her a camera for the specific purpose of her taking nude photos of herself. *See* McCawley Dec. at Exhibit 16 Sjoberg Tr. at 150. Finally, Virginia Giuffre testified that there was a nude photograph of her at the house. *See* McCawley Dec. at Exhibit 5 Virginia Giuffre Tr. at 232 and 333.

DEFENDANT'S PURPORTED FACTS

50. **Ms. Giuffre intentionally destroyed her “journal” and “dream journal” regarding her “memories” of this case in 2013 while represented by counsel.** Ms. Giuffre drafted a “journal” describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her possession. *Id.* Ms. Giuffre also kept a “dream journal” regarding her thoughts and memories that she possessed in January 2016. To date, Ms. Giuffre cannot locate the “dream journal.”

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

The dream journal contained memories of Ms. Giuffre's dreams. While Ms. Giuffre has looked for this journal, which is wholly irrelevant to this case, she has been unable to locate it. Ms. Giuffre also wrote in a personal journal some of her experiences with Maxwell and Epstein, which were harmful and painful. In an effort to relieve herself of those past painful experiences, Ms. Giuffre followed the advice of a therapist, and burned the journal as a form of cathartic release at a time when she was under no obligation to maintain the personal memorialization of personal and painful experiences. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 205:13-206:10.

DEFENDANT'S PURPORTED FACTS

51. **Ms. Giuffre publicly peddled her story beginning in 2011.** Ms. Giuffre granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with Ms. Giuffre and her “attorneys or other agents” from “early 2011” to “the present day.” Ms. Giuffre received approximately \$160,000 for her stories and pictures that were published by many news organizations.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant's statement misrepresents history. In 2011, Ms. Giuffre was still in hiding from Epstein and Maxwell in Australia. Ms. Giuffre was not looking to sell anything or even speak with anyone about what had happened to her in her previous life from which she dramatically escaped. Journalist, Sharon Churcher, located Ms. Giuffre and impressed the importance of Ms. Giuffre standing up to those who had harmed her and speak with Federal authorities, which Ms. Giuffre did in 2011. *See* McCawley Dec. at Exhibit 31, Redacted 302 GIUFFRE001235-01246.

In addition, Churcher impressed the importance of bringing the abuse of Defendant and Epstein to public light to prevent their continued abuse of others. *See* McCawley Dec. at Exhibit 35, Giuffre003690. After much deliberation, Ms. Giuffre agreed to be interviewed by Churcher, and was compensated for sharing her story, which came at a heavy price of being publicly scrutinized.

DEFENDANT'S PURPORTED FACTS

52. **Ms. Giuffre drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish.** In 2011, contemporaneous with her Churcher interviews, Ms. Giuffre drafted a book manuscript which purported to document Ms. Giuffre's experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Ms. Giuffre communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials and circulated those along with book chapters to numerous individuals associated with publishing and the media.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant's characterization of these activities are out of context and thus misleading. In 2008, Ms. Giuffre received a Victim Notification Letter from the United States Attorney's office for the Southern District of Florida, *see* McCawley Dec. at Exhibit 30, GIUFFRE0010202, regarding her sexual victimization by Epstein. Thereafter, in 2011, she sought psychological counseling from a psychologist for the trauma she endured. Also that year, journalist Sharon Churcher sought her out, and traveled half way around the globe to interview her on painful subjects. Ms. Giuffre was interviewed by the FBI in 2011. *See* McCawley Dec. at Exhibit 31, FBI Redacted 302 GIUFFRE01235-1246. She was also getting psychological help. *See* McCawley Dec. at Exhibit 38, Lightfoot Records, GIUFFRE005431-005438. In that situation, Ms. Giuffre began to draft a fictionalized account of what happened to her. It was against this backdrop of her trauma being unearthed, her steps to seek psychological counseling for it, that she drafted this manuscript. Doing so was an act of empowerment and a way of reframing and taking control over the narrative of her past abuse that haunts her.

"Writing 'I' has been an emancipatory project for women." Perreault, Jeanne, "AUTOGRAPHY/ TRANSFORMATION/ ASYMMETRY," *Women, Autobiography, Theory A Reader* edited by Sidonie Smith & Julia Watson. Indeed, scholars have written that the act of engaging in autobiography or even accounts loosely based on autobiography, is a process of taking control of one's own narrative and one's own self: "Thus a specific recitation of identity involves the inclusion of certain identity contents and the exclusion of others; the incorporation of certain narrative itineraries and internationalities, the silencing of others; the adoption of certain autobiographical voices, the muting of others." Smith, Sidonie, PERFORMATIVITY,

AUTOBIOGRAPHICAL PRACTICE, RESISTANCE, *Women, Autobiography, Theory A Reader* edited by Sidonie Smith & Julia Watson.

Indeed, even a cursory look at the manuscript penned by Ms. Giuffre informs the reader that she is trying to put forth a more palatable and more empowering narrative to over-write that powerlessness she felt when being abused by Defendant and Epstein. While Ms. Giuffre explored trying to publish her story to empower other individuals who were subject to abuse, she ultimately decided not to publish it. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. 249:16-18; 250:19-251:3.

DEFENDANT’S PURPORTED FACTS

53. **Ms. Giuffre’s publicly filed “lurid” CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz.** On December 30, 2014, Ms. Giuffre, through counsel, publicly filed a joinder motion that contained her “lurid allegations” about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a “corrected” motion and two further declarations in January and February 2015, which repeated many of Ms. Giuffre’s claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between Ms. Giuffre’s lawyers, Edwards and Cassell, and Alan Dershowitz. After Ms. Giuffre publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called Ms. Giuffre a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations.

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

See Ms. Giuffre’s Paragraph 7, *supra*, explaining why the allegations were necessary and appropriate for multiple reasons. Ms. Giuffre disputes Defendant’s false characterization of these events, and, indeed, the media attention was caused by Defendant’s issuing her defamatory press release.

DEFENDANT'S PURPORTED FACTS

54. **Ms. Giuffre formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy.** In 2014, Ms. Giuffre, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to Ms. Giuffre, the purpose of the organization is to promote Ms. Giuffre's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Ms. Giuffre attempts to promote Victims Refuse Silence at every opportunity. For example, Ms. Giuffre participated in an interview in New York with ABC to promote the charity and to get her mission out to the public.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did not form the non-profit Victims Refuse Silence to "speak out on a public controversy," but instead to simply help survivors of sexual abuse and sexual trafficking. In order to provide assistance to victims, Ms. Giuffre attempted to talk about the non-profit's mission when she had the opportunity to do so. *See* www.victimsrefusesilence.org.

MS. GIUFFRE'S STATEMENT OF UNDISPUTED FACTS

55. Virginia Roberts was born August 9, 1983. *See* McCawley Dec. at Exhibit 51, Driver's License GIUFFRE009209.

56. Virginia Roberts turned 18 on August 9, 2001.

57. In 2000, Virginia's father Sky Roberts worked at the Mar-a-Lago. *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72, 74.

58. Sky Roberts got Virginia a job at Mar-a-Lago in 2000, either months before or just after Virginia's 17th birthday. *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72, 74; Giuffre Dep. Tr. at 25:19-25:21; 28:10-28:12.

59. The only year in which Virginia was employed at Mar-a-Lago was 2000. *See* McCawley Dec. at Exhibit 49, MAR-A-LAGO 0173, 0176.

60. Virginia worked at Mar-a-Lago as a spa bathroom attendant. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 61:9-61:24; Austrich Dep. Tr. at 100:3-12.

61. Virginia was not a masseuse at Mar-a-Lago as she had no massage experience. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12; Austrich Dep. Tr. at 34-35, 100-101, 127-128; Figueroa Dep. Tr. at 82:10-15; 168:24-169:1; Sky Roberts Dep. Tr. at 80:7-19; 84:18 -85:1.

62. Maxwell approached Virginia at Mar-a-Lago, and recruited her to come to Jeffrey Epstein's house. *See* McCawley Dec. at Exhibits 1, 5, and 17, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12; Alessi Dep. Tr. at 94:24-95:2; Sky Roberts Dep. Tr. at 80:7-19; 84:18 -85:1.

63. At the time Maxwell recruited Virginia to Jeffrey Epstein's house, Virginia was either 16 or 17 years old, depending on whether this occurred just before or just after Virginia's birthday. *See* McCawley Dec. at Exhibit 49, MAR-A-LAGO 0173, 0176.

64. Virginia followed Maxwell's instructions and reported to Jeffrey Epstein's house on the night of the day when Maxwell approached Virginia at Mar-a-Lago. *See* McCawley Dec. at Exhibits 5 and 18, Giuffre Dep. Tr. at 117:20-118:1; Alessi Dep. Tr. at 96-98; GIUFFRE000102-103 at p. 48-49.

65. Maxwell told Virginia at Mar-a-Lago that Virginia could get paid for giving a massage to Jeffrey Epstein. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12.

66. When Virginia arrived at Epstein's house, she was taken upstairs to Epstein's bedroom, and instructed by Maxwell and Epstein how to give Epstein a massage. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18; Epstein Dep. Tr. at 74:3-14.

67. Epstein and Maxwell turned the massage into a sexual encounter. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18.

68. Virginia was not a professional masseuse, and was not old enough to be a masseuse in Florida even though Maxwell testified she only hired professional masseuses. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 61:9-61:24, 111:12-111:21, 116:19-117:12; Fla. Stat. § 480.041; Maxwell Dep. Tr. at 23:21-24:9; 31:6-18; 41:7-13; 220:13-221:2; 225:23-226:20; 248:5-16; 310:6-17; 383:2-18.

69. Maxwell and Epstein promised Virginia money and a better life in exchange for complying with their sexual demands. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18.

70. Maxwell had sex with Virginia and other females. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 138:17-139:16; Maxwell 07-22-2016 Dep. Tr. at 86:25-87:9; 91:15-91:21.

71. Virginia was trafficked nationally and internationally for sexual purposes. *See* McCawley Dec. at Exhibits 5, 1, 41? GIUFFRE007055-007161 (Flight Logs); Giuffre Dep. Tr. at 193:22-194:16; 201:24; 204:24:205:5; Alessi Dep. Tr. at 104:9-104:14; Andrew Photo GIUFFRE007167; Spain Photo GIUFFRE007166.

72. Maxwell recruited other non-professionals under the guise of being a masseuse, but in reality only recruited girls for sexual purposes. *See* McCawley Dec. at Exhibits 5, 16, 4, 1, 18 Giuffre Dep. Tr. at 198:20-199:3; Sjoberg Dep. Tr. at 13-15; Figueroa Dep. Tr. at 88:12-22; Alessi Dep. Tr. at 34; GIUFFRE000105 at 57-58; GIUFFRE000241-242 at p. 212-213.

73. Maxwell was the boss of others whose job it was to recruit minor females for Epstein for sex, such as Sarah Kellen. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 26:10-26:20.

74. Maxwell was a recruiter of underage girls and other young females for Epstein for sex, and was the boss in charge of those females. *See* McCawley Dec. at Exhibits 16, 4, 21, and 1, Sjoberg Dep. Tr. 8-9, 13-15, 27; Figueroa Dep. Figueroa Dep. Tr. at 200:6-18; 228:23-229:21; Rodriguez Dep. Tr. 169:1-169:4; Alessi Dep. Tr. at 23:11-23:20; 34:19-35:3; 98:5-98:12; 104:15-104:23.

Dated: January 31, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 31, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____ /

**DECLARATION OF SIGRID MCCAWLEY IN SUPPORT OF
PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT AND UNDISPUTED FACTS**

I, Sigrid McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a Partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in Support of Plaintiff's Response to Defendant's Motion for Summary Judgment and Undisputed Facts.
3. Attached hereto as Sealed Exhibit 1 are true and correct copies of Excerpts from June 1, 2016 Depositions of Juan Alessi.
4. Attached here to as Sealed Exhibit 2 is a true and correct copy of Excerpts from June 23, 2016, Deposition of James Austrich.
5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from September 9, 2016, Deposition of Jeffrey Epstein.
6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from June 24, 2016, Deposition of Tony Figueroa (Volumes I and II).

7. Attached hereto as Sealed Composite Exhibit 5 are true and correct copies of Excerpts from May 3, 2016 and November 14, 2016, Deposition of Virginia Giuffre.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from November 18, 2016, Deposition of Ross Gow.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from June 20, 2016, Deposition of [REDACTED].

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Excerpts from January 25, 2017, Deposition of Sarah Kellen.

11. Attached hereto as Sealed Exhibit 9 is a true and correct copy of Excerpts from November 29, 2016, Deposition of Peter Kent.

12. Attached hereto as Sealed Exhibit 10 is a true and correct copy of Excerpts from January 17, 2017, Deposition of Nadia Marcinko.

13. Attached hereto as Sealed Composite Exhibit 11 are true and correct copies of Excerpts from April 22, 2016 and July 22, 2016, Depositions of Ghislaine Maxwell.

14. Attached hereto as Sealed Exhibit 12 is a true and correct copy of Excerpts from May 24, 2016, Deposition of Lynne Trudy Miller

15. Attached hereto as Sealed Exhibit 13 is a true and correct copy of Excerpts from June 21, 2016, Deposition Joseph Recarey.

16. Attached hereto as Sealed Exhibit 14 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

17. Attached hereto as Sealed Exhibit 15 is a true and correct copy of Excerpts from June 3, 2016, Deposition of David Rodgers.

18. Attached hereto as Sealed Exhibit 16 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoborg.

19. Attached hereto as Sealed Exhibit 17 is a true and correct copy of Excerpts from May 20, 2016, Deposition of Sky Roberts.

20. Attached hereto as Sealed Composite Exhibit 18 are true and correct copies of Excerpts from September 8, 2009, Depositions of Juan Alessi (GIUFFRE000102-000103; GIUFFRE000105; GIUFFRE000241-000242).

21. Attached hereto as Sealed Exhibit 19 is a true and correct copy of Excerpts from February 16, 2010, Deposition of Janusz Banasiak (GIUFFRE004431-004432; GIUFFRE004437-004438; GIUFFRE004477).

22. Attached hereto as Sealed Exhibit 20 is a true and correct copy of Excerpts from October 20, 2009, Deposition of Louella Rabuyo (GIUFFRE004386).

23. Attached hereto as Sealed Composite Exhibit 21 is a true and correct copy of Excerpts from July 29, 2009 and August 7, 2009, Deposition of Alfredo Rodriguez (GIUFFRE000936-000937; GIUFFRE000942; GIUFFRE000953-000954; GIUFFRE000974; GIUFFRE000978; GIUFFRE000996; GIUFFRE000999-001000; GIUFFRE001003).

24. Attached hereto as Sealed Exhibit 22 is a true and correct copy of August 1, 2016, Defendant's Privilege Log.

25. Attached hereto as Sealed Exhibit 23 is a true and correct copy of September 15, 2016, Expert Report of Professor Terry Coonan.

26. Attached hereto as Sealed Exhibit 24 is a true and correct copy of September 15, 2016, Expert Report of Doctor Bernard Jansen.

27. Attached hereto as Sealed Exhibit 25 is a true and correct copy of November 28, 2016, Expert Report of Peter Kent

28. Attached hereto as Sealed Exhibit 26 is a true and correct copy of January 2, 2015, Email Correspondence (GM_00068).

29. Attached hereto as Sealed Exhibit 27 is a true and correct copy of Excerpts of Palm Beach School County Records (GM_00888-00898).

30. Attached hereto as Sealed Exhibit 28 is a true and correct copy of Excerpts of Message Pads (GIUFFRE001388; GIUFFRE001409; GIUFFRE001412-4213; GIUFFRE001417-18, GIUFFRE001421; GIUFFRE001423; GIUFFRE001426-1428; GIUFFRE001432-1433; GIUFFRE001435; GIUFFRE001446; GIUFFRE001448-1449; GIUFFRE001452-1454; GIUFFRE001456; GIUFFRE001462; GIUFFRE001474; GIUFFRE001563).

31. Attached here to as Sealed Exhibit 29 is a true and correct copy of Epstein's Black Book (GIUFFRE001573-GIUFFRE001669).

32. Attached hereto as Sealed Exhibit 30 is a true and correct copy of September 3, 2008, U.S. Attorney Victim Notification Letter (GIUFFRE002216-002218).

33. Attached hereto as Sealed Exhibit 31 is a true and correct copy of July 5, 2013, Federal Bureau of Investigation Interview (GIUFFRE001235-001246).

34. Attached hereto as Sealed Exhibit 32 is a true and correct copy of Handwritten Note from Defendant. (GIUFFRE003191-003192).

35. Attached hereto as Sealed Exhibit 33 is a true and correct copy of July 2001 New York Presbyterian Hospital Records (GIUFFRE003258-003290).

36. Attached hereto as Sealed Exhibit 34 is a true and correct copy of a February 17, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003678).

37. Attached hereto as Sealed Exhibit 35 is a true and correct copy of February 13, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003690).

38. Attached hereto as Sealed Exhibit 36 is a true and correct copy of February 25, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003731.).

39. Attached hereto as Exhibit 37 is a true and correct copy of a Passport Application

(GIUFFRE004721).

40. Attached hereto as Sealed Exhibit 38 is a true and correct copy of Judith Lightfoot Psychological Records (GIUFFRE005431-005438).

41. Attached hereto as Sealed Exhibit 39 is a true and correct copy of July 25, 2006, Palm Beach Police Department Incident Report (GIUFFRE005614-005700).

42. Attached hereto as Sealed Exhibit 40 is a true and correct copy of an Amazon Receipt (GIUFFRE006581).

43. Attached hereto as Sealed Exhibit 41 is a true and correct copy of David Rodger's June 3, 2016, Deposition Exhibit 1, Flight Log, (GIUFFRE007055-007161).

44. Attached hereto as Sealed Exhibit 42 are true and correct copies of Photographs (GIUFFRE007162-7182).

45. Attached hereto as Sealed Exhibit 43 is a true and correct copy of Travel Documents to Thailand (GIUFFRE007411-GIUFFRE007432).

46. Attached hereto as Sealed Exhibit 44 is a true and correct copy of Walkthrough Video CD (GIUFFRE007584).

47. Attached hereto as Sealed Exhibit 45 is a true and correct copy of West Palm Beach Contact List (GIUFFRE007834-GIUFFRE007847).

48. Attached hereto as Sealed Exhibit 46 is a true and correct copy of October 23, 2016, Social Security Administration records (GIUFFRE009176-GIUFFRE009179).

49. Attached hereto as Sealed Exhibit 47 is a true and correct copy of November 7, 2016, Employment Records from Courtyard Animal Hospital (GIUFFRE009203).

50. Attached hereto as Sealed Exhibit 48 is a true and correct copy of January 2, 2015, Email Correspondence (RG (UK) _000009).

51. Attached hereto as Sealed Exhibit 49 are true and correct copies of Termination

Documents (MAR-A-LAGO 0173 & MAR-A-LAGO 0176).

52. Attached hereto as Sealed Exhibit 50 is a true and correct copy of January 2, 2015, Joinder Motion (GIUFFRE000319-000333).

53. Attached hereto as Sealed Exhibit 51 is a true and correct copy of Virginia Roberts Driver License (GIUFFRE009209).

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid McCawley
Sigrid McCawley, Esq.

Dated: January 31, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of January, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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/s/ Sigrid McCawley
Sigrid McCawley

EXHIBIT 1

(Filed 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 1, 2016

9:12 a.m.

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

Deposition of JOHN ALESSI, 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 JOHN ALESSI

2 Q. You're ready to start, correct?

3 A. Yes.

4 Q. Can you tell us your current address?

5 A. [REDACTED] Boynton Beach,
6 Florida 33472.

7 Q. And your date of birth?

8 A. [REDACTED].

9 Q. And was there a time when you worked for a
10 man named Jeffrey Epstein?

11 A. Yes.

12 Q. And can you tell us when you began working
13 for Mr. Epstein?

14 A. I began working for Mr. Epstein part-time.
15 I cannot exactly tell you the date, but it was
16 1990/'91, probably. I worked a total of 13 years
17 for him.

18 Q. Okay. So you began in 1990 part-time,
19 correct?

20 A. Right.

21 Q. And you stopped working for him when?

22 A. I stopped working for him on
23 December 31st, 2001. I was out -- yes, 2001.

24 Q. Okay.

25 A. The end of 2001. I left the last day of

1 JOHN ALESSI

2 the year.

3 Q. Okay. I know that it's been a long time.

4 A. It's been a long time.

5 Q. I know. So I'm going to ask that you
6 refer to the statement that you provided to the
7 police November 21st, 2005, and please go to page 5.
8 I just want you to start reading at line 2 and 3,
9 and tell me if that refreshes your recollection as
10 to your time or duration of employment.

11 A. You're right. It was 2002, then. 2002.

12 Q. So sometime in 1990, you were a part-time
13 employee?

14 A. Uh-huh.

15 Q. And you worked until December 31st, 2002;
16 is that right?

17 A. Yes.

18 Q. Okay. And is it also correct that you
19 began full-time employment with Mr. Epstein on
20 January 1st, 1991, as stated in that report?

21 A. Yes.

22 Q. Prior to 1990, who did you work for?

23 A. Prior to 1990, I had a company, a
24 maintenance company, myself, my own company, Alessi
25 Maintenance. And before that, I worked for another

1 JOHN ALESSI

2 family, the Radi family in Palm Beach.

3 Q. Did you ever work for a man named Les
4 Wexner?

5 A. I did some work for him in his mother's
6 house.

7 Q. Where was that?

8 A. Palm Beach. What year? Before -- before
9 I came to work for Jeffrey.

10 Q. Is that who recommended that you work for
11 Jeffrey Epstein?

12 A. I guess so.

13 Q. Okay. When you started with Jeffrey
14 Epstein, what were your job duties?

15 A. I was doing maintenance. I was doing
16 building and rebuilding and maintenance work
17 basically. Because he just bought the house at that
18 time. And because of Mr. Wechsler knowing me, they
19 recommend me to go to the house and take a look at
20 the house. And we start tearing the house down,
21 basically, at the beginning of my job.

22 Q. Did you assist in the teardown?

23 A. Yes.

24 Q. Okay. So your job duties then was that of
25 a maintenance?

1 JOHN ALESSI

2 A. Maintenance, building.

3 Q. Got it.

4 And did you meet Mr. Epstein when you
5 were -- in 1990?

6 A. Yes, I met him.

7 Q. Okay. And in 1991, who made the decision
8 for you to become a full-time employee?

9 A. Jeffrey.

10 Q. And as a full-time employee initially,
11 what was your job?

12 A. I was basically maintenance, the same
13 thing as I was doing with -- I was exclusively
14 working for him. I was full-time working for him as
15 maintenance, because the house was still on
16 renovation, and he wanted me there.

17 Q. Okay. And how was your relationship with
18 Mr. Epstein back then, 1991?

19 A. Great. No problem.

20 Q. It was good?

21 A. It was good.

22 Q. Did he have a girlfriend back then, in
23 1991?

24 MR. PAGLIUSCA: Object to the form and
25 foundation.

1 JOHN ALESSI

2 You can answer the question.

3 Occasionally, I'll need to object for the
4 record in case we need to have a discussion
5 about this with the judge. And so that's just
6 me preserving those objections.

7 THE WITNESS: Yes, he had a girlfriend.
8 Her name was Dr. Andersson, Eva Andersson. And
9 she was there just for a few months after I
10 came to the house.

11 BY MR. EDWARDS:

12 Q. And how was your relationship with
13 Dr. Andersson?

14 A. Fine.

15 Q. Okay. And at the time when Mr. Epstein
16 was -- at the time when Dr. Andersson was Jeffrey
17 Epstein's girlfriend, did you see any other female
18 companions around the house?

19 A. Eventually -- they have a lot of guests,
20 too. They did have guests coming in. But I can't
21 remember exactly who. It's a socialite. So they
22 have friends.

23 Q. At the time when Dr. Andersson was
24 Mr. Epstein's girlfriend, was Mr. Epstein getting
25 massages?

1 JOHN ALESSI

2 MR. PAGLIUSCA: Object to the form and
3 foundation.

4 THE WITNESS: I think so. I was not
5 involved in the house, inside of the house that
6 much. But they always got massages. Always.

7 BY MR. EDWARDS:

8 Q. Okay. I'm talking about the time period
9 when Dr. Andersson was there.

10 A. Yes, they got massages.

11 Q. Okay. So do you remember other female
12 visitors when Dr. Andersson was Mr. Epstein's
13 girlfriend?

14 A. I don't remember. I remember people being
15 there, visitors, but I cannot remember that far.

16 Q. Okay. After -- did there come a point in
17 time when Dr. Andersson was no longer Mr. Epstein's
18 girlfriend?

19 A. Right.

20 Q. Yes?

21 A. Yes.

22 Q. And did he -- did he have a new
23 girlfriend?

24 MR. PAGLIUSCA: Object to form and
25 foundation.

1 JOHN ALESSI

2 Q. All right.

3 Who was in charge of the Palm Beach house?

4 A. I was.

5 Q. All right.

6 Who was your direct supervisor?

7 A. Mr. Epstein. He would deal with me
8 directly, or if he was not available, Ms. Maxwell.

9 Q. Okay. I want you to go to Exhibit 3 and
10 page -- page 179, line 8.

11 A. Line 8, "QUESTION: And then Maxwell came
12 and she took over you as your immediate supervisor?

13 Yes. That's correct. Yes. She became
14 the supervisor not only for this house, but for all
15 the homes.

16 Q. Okay. So your immediate supervisor was
17 Ms. Maxwell?

18 A. Ms. Maxwell. But if Mr. Epstein was at
19 the house, I would never go to Ms. Maxwell; I would
20 go to him directly, or he would come to me.

21 Q. Okay. At some point in time towards the
22 end of your tenure, did you come to resent
23 Ms. Maxwell?

24 MR. PAGLIUSCA: Object to the form and
25 foundation.

1 JOHN ALESSI

2 Q. And where did the massage therapists --
3 where did they come from?

4 A. Most, they came from Palm Beach. Palm
5 Beach County.

6 Q. And over the course of that 10-year period
7 of time while Ms. Maxwell was at the house, do you
8 have an approximation as to the number of different
9 females -- females that you were told were massage
10 therapists that came to the house?

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

13 THE WITNESS: I cannot give you a number,
14 but I would say probably over 100 in my stay
15 there.

16 BY MR. EDWARDS:

17 Q. And many of the times would the females
18 come only one time and not return?

19 MR. PAGLIUSCA: Object to form and
20 foundation.

21 BY MR. EDWARDS:

22 Q. Let me ask that a different way.

23 Were there times when some of these
24 females that would come to the house, and you were
25 told that they were massage therapists, would come

1 JOHN ALESSI

2 BY MR. EDWARDS:

3 Q. Okay. And who would find the massage
4 therapist to bring to the house?

5 A. They would call me in my office, and they
6 would say, Get me a massage at 10:00 with this
7 person.

8 I have a list of the massage therapists, a
9 Rolodex, or a card, and I would call them for the
10 specific time they want a massage. And I would do
11 that.

12 Q. I don't think I asked the right -- the
13 question that I was looking to ask, so let me go
14 back.

15 Did you go out looking for the girls --

16 A. No.

17 Q. -- to bring --

18 A. Never.

19 Q. -- as the massage therapists?

20 A. Never.

21 Q. Who did?

22 A. Ms. Maxwell, Mr. Epstein and their
23 friends, because their friends relayed to other
24 friends they knew a massage therapist and they would
25 send to the house. So it was referrals.

1 JOHN ALESSI

2 foundation. Hold on. That misstates what is
3 happening in this deposition, because the word
4 "recruit" was introduced by the lawyers in this
5 deposition. So I object to your
6 characterization of the testimony.

7 BY MR. EDWARDS:

8 Q. I'll read for you the question and the
9 answer.

10 The question was: "QUESTION: When did
11 that role get transferred from you to Ms. Maxwell,
12 the role of looking after girls or calling the
13 girls?

14 "ANSWER: I didn't look after -- out for
15 girls. Ms. Maxwell was the one that recruit. I
16 remember one occasion or two occasions she would say
17 to me, John, give me a list of all the spas in Palm
18 Beach County, and I will drive her from one to the
19 other to PGA in Boca; and she would go in and drop
20 credit cards -- not credit cards but business cards,
21 and she would come out. And then we'd go to -- she
22 will recruit the girls. Was never, never done by me
23 or Mr. Epstein or anyone else that I know of."

24 Is that truthful testimony?

25 A. It is truthful; however, I think

1 JOHN ALESSI

2 "recruiting," for myself, for my point of view, is
3 hiring immediately and recruit the person.

4 I think she was looking for massage
5 therapists. She was looking for the best kind. She
6 went -- and you're right, I went one time with her,
7 or twice maybe, to different spas and different
8 clubs, great clubs, I mean, in Boca, in Fort
9 Lauderdale, in -- in Palm Beach. She was looking
10 for the best massage therapists available.

11 How she find these girls, I don't know. I
12 just drove there. I just was the driver. I never
13 was involved with any of the offerings or
14 negotiations or meeting these girls. Never.

15 Q. Okay. Ms. Maxwell was the one that would
16 meet the girls?

17 A. Yeah.

18 Q. Okay. Did you ever check any of the IDs
19 for any of these girls?

20 A. I was not -- that was not in my everyday
21 things to do. It was not.

22 Q. That was just not part of your job?

23 A. That was not my job.

24 Q. Did Ms. Maxwell take photographs while she
25 was at the Palm Beach house?

1 JOHN ALESSI

2 MR. PAGLIUSCA: Object to form and
3 foundation.

4 THE WITNESS: Himself. Himself.

5 BY MR. EDWARDS:

6 Q. And you do not know the ages of the
7 various massagists, right?

8 A. No.

9 Q. Did you have occasion to clean up after
10 the massages?

11 A. Yes.

12 Q. Okay. And that is after both a massage
13 for Jeffrey Epstein, as well as clean up after a
14 massage that Ghislaine Maxwell may have received?

15 A. Yes.

16 Q. And on occasion, after -- in cleaning up
17 after a massage of Jeffrey Epstein or Ghislaine
18 Maxwell, did you have occasion to find vibrators or
19 sex toys that would be left out?

20 MR. PAGLIUSCA: Object to form and
21 foundation.

22 THE WITNESS: Yes, I did.

23 BY MR. EDWARDS:

24 Q. Can you describe the types of vibrators or
25 sex toys that you found left out after a massage

1 JOHN ALESSI

2 that Jeffrey Epstein had just received or Ghislaine
3 Maxwell had just received?

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

6 THE WITNESS: It was probably two to three
7 times, I would say. It was not all the time.
8 I would find things like a dildo, it's called a
9 double. I hate to say it because these ladies.
10 But I find these things, put my gloves on, took
11 it out and rinse it, and put it in
12 Ms. Maxwell's closet.

13 BY MR. EDWARDS:

14 Q. Why would you put the dildo or sex toy in
15 Ms. Maxwell's closet?

16 A. Because I knew that's where they were
17 kept.

18 Q. How did you know that the sex toys were
19 kept in Ms. Maxwell's closet?

20 A. Because I know where everything was in
21 that house. Every single room, every single thing,
22 it was a place, it was placed by me, by the cleaning
23 lady or my wife. Every -- everything that happened
24 in that house, I knew it.

25 Q. Who showed you where the dildo or sex toys

1 JOHN ALESSI

2 were kept in the house the first time?

3 MR. PAGLIUSCA: Object to form and
4 foundation.

5 THE WITNESS: Nobody. Nobody show me.

6 BY MR. EDWARDS:

7 Q. You just saw it?

8 A. I saw it.

9 Q. So you knew where to put it back?

10 A. Yeah. We had to open the closet, clean
11 the closet, put the clothes in place, put the shoes
12 in place, put everything in place. So it was a
13 matter of tidying things up.

14 Q. Did you ever find any costumes?

15 A. I saw one shiny black costume, but I
16 didn't even know --

17 Q. Where did you see it?

18 A. The same place.

19 Q. In Ms. Maxwell's closet?

20 A. Yes.

21 Q. And where was Ms. Maxwell's closet in the
22 house?

23 A. In the house? It was in the opposite side
24 of his bathroom. It was her bathroom in the master
25 bedroom. It was in the middle. So it was on the

1 JOHN ALESSI

2 BY MR. EDWARDS:

3 Q. That demonstrates that she was, I believe,
4 terminated from her employment in 2000.

5 My question to you is: Do you remember
6 what time of year or what month it would have been,
7 whether spring, summer, fall, winter; January,
8 February, December?

9 A. Of what year?

10 Q. Of 2000, that you would have gone to the
11 Mar-a-Lago?

12 A. It wasn't 2000.

13 MR. PAGLIUSCA: Object to form and
14 foundation.

15 BY MR. EDWARDS:

16 Q. Okay. Do you think it was a different
17 year that you went to Mar-a-Lago?

18 A. Yes.

19 Q. Okay. What year do you believe that you
20 went to the Mar-a-Lago to pick Virginia up?

21 A. I think it was 2000 and -- I think it was
22 the summer of 2002.

23 Q. Okay.

24 A. Summer, because I remember that day that I
25 was sweating like hell in the -- in the car, waiting

1 JOHN ALESSI

2 for Ms. Maxwell to come out of the massage.

3 Q. Okay. So what month of the summer do you
4 remember it being?

5 A. I think in June, July, maybe, 2001.

6 Q. 2000 and what?

7 A. 2001.

8 Q. June, July, 2001, that's when you believe
9 that it was?

10 A. Yes.

11 Q. Okay. And do you remember the month --

12 A. No, sorry. Sorry. Not 2001. We left in
13 December 31st. It was 2000 -- the last year that I
14 was working for Jeffrey, when I met Virginia.

15 Q. Your recollection, as you sit here
16 today --

17 A. It was 2002.

18 Q. -- is that it was June or July of 2002 --

19 A. 2002.

20 Q. -- when you met Virginia Roberts at the
21 Mar-a-Lago?

22 A. My recollection.

23 Q. Okay. And other than the fact that you
24 were sweating, what else tells you what month that
25 it was that you remember meeting her at the

1 JOHN ALESSI

2 Mar-a-Lago?

3 A. It was -- I know it was summer of 2002,
4 and she spoke to -- far away. I wasn't -- I was in
5 the driveway, and she was far away talking to
6 Virginia. She spoke to her maybe five minutes.

7 Q. Okay.

8 A. And she came to the car, and we went home.
9 In the afternoon, about 4:00 or 5:00 in the
10 afternoon, the same day, Virginia came to the house.

11 Q. Who brought her to the house?

12 A. I don't know. She came to the back door,
13 I remember. And she was dressed differently. She
14 came to the house.

15 Q. When you first arrived to the Mar-a-Lago
16 with -- are you driving the car and Ms. Maxwell is
17 in the passenger seat?

18 A. Yes.

19 Q. And could you see Virginia Roberts from
20 the car?

21 A. Yes.

22 Q. Where was she sitting or standing? How
23 far away from the car?

24 A. She was standing right in front of the
25 driveway. This is the Mar-a-Lago, the house, and

1 JOHN ALESSI

2 here is the spa, and the driveway that's here. I
3 was parked this way, and I would see her with
4 Ms. Maxwell, talking.

5 Q. Did you --

6 A. I could not hear what they were saying,
7 but I did see it.

8 Q. Did you park the car or did you stop right
9 there and --

10 A. I parked the car because we are not
11 allowed to go into Mar-a-Lago.

12 Q. Okay. Let me finish my question.

13 Did you park the car in a parking space in
14 the parking lot or did you just stop on the side of
15 the road and Ms. Maxwell got out?

16 A. Mar-a-Lago has a -- has a long wide
17 driveway, and on the right of the driveway is -- is
18 the parking spots like this or something. And I
19 parked in one of those spaces. And waiting for her,
20 I think it was over an hour that I wait for her.

21 Q. Okay. So did you watch her first talk
22 to --

23 A. No. At the end. Right at the end,
24 before -- when she was leaving.

25 Q. So Ms. Maxwell gets out of the car. And

1 JOHN ALESSI

2 when you're pulling up to the Mar-a-Lago, could you
3 see Virginia Roberts then?

4 A. No. No.

5 Q. So after you wait an hour, Ms. Maxwell is
6 coming out?

7 A. And then she saw Virginia and she
8 stopped -- she went to her, she talked to her, she
9 came back to the car.

10 Q. And prior to that day, you had never seen
11 Virginia at the house?

12 A. Never. Never.

13 Q. Okay. Did Ms. Maxwell tell you that
14 Virginia's father worked at the Mar-a-Lago?

15 A. I don't think so. I think it was -- I
16 think we find out later, after the -- she says, My
17 father works -- I think it was from Virginia, that
18 she says her father works at Mar-a-Lago.

19 It is information from her. I don't think
20 it was Ms. Maxwell that told me anything. She don't
21 have to -- she don't have to talk to me. I mean,
22 Ms. Maxwell will not go and talk to me about this --
23 these people's family. I don't know. She never
24 did.

25 Q. Okay. I only have to go by what I have.

1 JOHN ALESSI

2 I don't remember that day, how she got
3 home. I don't know. I can't remember.

4 Q. After that day, do you recall that she
5 started coming to the house more frequently?

6 A. Yes, she did.

7 Q. In fact, did she start coming to the house
8 approximately three times a week?

9 A. Yes, probably.

10 Q. And at times, would you go pick her up?

11 A. Yes. This happened maybe twice, three
12 times.

13 Q. And at times, would you take her home?

14 A. Yes.

15 Q. And did there come a point in time where
16 Virginia starting bringing other girls with her?

17 MR. PAGLIUSCA: Object to form and
18 foundation.

19 THE WITNESS: That was maybe two weeks
20 before we left. I saw her bringing some
21 friends with her to the house. And I cannot
22 remember how many times, but I was at the end
23 of our stay.

24 BY MR. EDWARDS:

25 Q. At the end of her [sic] stay, you saw when

1 JOHN ALESSI

2 she would come over to the house, she would bring
3 certain friends who were girls --

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

6 BY MR. EDWARDS:

7 Q. -- to the house, right?

8 A. Yes, females, yes.

9 Q. Do you know how long Virginia had been
10 coming over to the house before she started
11 traveling on an airplane with Ghislaine and Jeffrey?

12 MR. PAGLIUSCA: Object to foundation.

13 THE WITNESS: Not too long. I don't think
14 it was too long after that.

15 BY MR. EDWARDS:

16 Q. Would you drive her to the airport with
17 them?

18 A. Occasionally, I think so, yes. I would
19 drive everybody to the airport. My wife would drive
20 the chefs, the service people, the luggage to Jet
21 Aviation.

22 Q. Is that where Mr. Epstein kept his plane,
23 Jet Aviation?

24 A. Yes.

25 Q. At some point did Ghislaine Maxwell become

1 JOHN ALESSI

2 MR. PAGLIUSCA: Seven.

3 MR. EDWARDS: Seven?

4 (The referred-to document was marked by
5 the court reporter for Identification as
6 Deposition Exhibit 7.)

7 MR. EDWARDS: I apologize, Jeff. I just
8 can't find a copy right now.

9 MR. PAGLIUSCA: I have it.

10 MR. EDWARDS: Okay.

11 BY MR. EDWARDS:

12 Q. So this is a composite exhibit. It is
13 four pages. The first one that you're looking at
14 should be -- do you have SAO 01456?

15 MR. PAGLIUSCA: Yes.

16 MR. EDWARDS: Okay.

17 BY MR. EDWARDS:

18 Q. Does the format of this look familiar to
19 you?

20 A. Yes. It looks like the books that we used
21 to have that has -- the message books.

22 Q. How would that work? How would that
23 process work?

24 A. Somebody called, you write it down, and
25 you take the -- you leave the copy in the -- in the

1 JOHN ALESSI

2 many things?

3 A. Yes, she did.

4 Q. Interesting buildings?

5 A. No. She -- she liked -- she had a dog,
6 and she took a lot of photographs of her dog. And
7 us. And she took photographs of the cars and the
8 house. Everything inside. She had an album full of
9 photographs of people, young girls, girls. And I
10 remember that she had. Like a hobby.

11 Q. Right.

12 You never saw any pictures that were very
13 upsetting to you, though, correct?

14 A. No. No.

15 Q. Okay. And the pictures that you saw were
16 sort of -- would you describe them as being artistic
17 kind of pictures?

18 MR. EDWARDS: Objection, counsel
19 testifying.

20 THE WITNESS: I think so. I don't think
21 they were pornographic. I don't think it was
22 any vaginal or things, you know, female parts
23 showing. It was some girls were topless,
24 taking the sun. It was a beautiful house, it
25 was a beautiful setting, so she took a lot of

EXHIBIT 2

(Filed Under Seal)

1 UNITED STATES DISTRICT COURT
2 for the
3 SOUTHERN DISTRICT OF NEW YORK
4 Civil Action No. 15-cv-07433-RWS

4 VIRGINIA GIUFFRE,
5 Plaintiff,

6 vs.

7 GHISLAINE MAXWELL
8 Defendant.

9 -----

10 VIDEO-DEPOSITION
11 OF: JAMES MICHAEL AUSTRICH
12 TAKEN BY: Defendant
13 REPORTED BY: Karla Layfield, RMR
14 Stenographic Court Reporter
Notary Public
State of Florida at Large
15 DATE AND TIME: June 23, 2016; 9:03 a.m.
16 PLACE: Owen & Associates Court Reporters
17 108 N. Magnolia Avenue, Suite 501
Ocala, Florida
18 APPEARANCES: Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
19 150 East 10th Avenue
Denver, Colorado 80203
20 Attorney for Defendant
21 Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
22 FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
23 Fort Lauderdale, Florida 33301
Attorney for Plaintiff
24

25 Also Present: Kenneth Sarsony, Videographer
Virginia Giuffre

Owen & Associates Court Reporters
P.O. Box 157, Ocala, Florida
352.624.2258 * owenassoc@aol.com

1 A Yes.

2 Q Was it is a franchise, if you know?

3 A I know when I first started there, they were
4 corporate, but then they were a franchise. They were
5 bought out. But I'm not sure if when I got there they
6 were a franchise or not.

7 Q Got it.

8 Do you know if Ms. Roberts had any previous
9 employment before she worked at Taco Bell?

10 A I think by the apartment, she worked for KFC for
11 a little while.

12 MS. MENNINGER: Are you looking at Ms.
13 Roberts?

14 THE WITNESS: I'm thinking. I can't
15 remember. I remember something with KFC. They
16 had one really close to us. I think she worked
17 there for a tiny, tiny bit. I'm not sure.

18 MS. MENNINGER: Okay.

19 BY MS. MENNINGER:

20 Q Before the Taco Bell?

21 A Or she could've applied there. It's just in my
22 head. She might have just applied there, and didn't get
23 it, and that's why I brought her to Taco Bell.

24 Q Okay.

25 A Because we were both the night managers.

1 A No.

2 Q Do you know about what years this was?

3 A Not really.

4 Q Do you know about how old you were?

5 A When, what?

6 Q I'm just focused on the period of time in which
7 you were living at her parent's house in the trailer.

8 A I was probably 18 when we moved in there.

9 Q And you said you were only there for a couple of
10 months?

11 A Not that I remember. Like, it might have been a
12 little longer. I'm not sure.

13 Q Were you engaged to Ms. Roberts?

14 A Yes.

15 Q When did you become engaged to her?

16 A When we were living in Oakland Park.

17 Q Tell me about the engagement. How did it come
18 about?

19 A Well, we fell in love, and -- I believe it was
20 Valentine's Day when I proposed.

21 Q Did you have a ring?

22 A Yes.

23 Q Did she accept?

24 A Yes.

25 Q How long were you engaged?

1 A Yes -- well, for a while. I mean, I know at the
2 end, I wasn't working anywhere.

3 Q Why weren't you working?

4 A I don't remember the exact reason.

5 Q Had you quit?

6 A I believe so. I know the pet store let me go
7 for walking on to the other side talking to somebody. But
8 I don't remember why I left Dunkin' Donuts.

9 Q Do you believe that you were fired from Dunkin'
10 Donuts?

11 A No. That pet store was the only time anybody
12 ever fired me.

13 Q That will stick in your brain.

14 A Yeah.

15 Q At the time that you left the pet store, was
16 Ms. Roberts still working there?

17 A Yes.

18 Q And how long do you recall her working there?

19 A Not long.

20 Q I hate to do this to you, but what does "not
21 long" mean to you, weeks, months, days?

22 A Over a month. That's really all I can say.
23 Maybe over a month before she went to work at the
24 Mar-a-Lago or Donald Trump's country club.

25 Q Did she leave the pet store to go work at

1 BY MS. MENNINGER:

2 Q Did you know her friend by the name of Tony
3 Figueroa?

4 A Somewhat.

5 Q Tell me what you remember about Tony Figueroa.

6 A Other than him being an idiot, not much.

7 Q Did you have any interactions with Mr. Figueroa?

8 A Very little.

9 Q When do you recall seeing him, like, in what
10 city, I mean?

11 A Up in West Palm Beach.

12 Q Did he come over to your apartment?

13 A I believe so.

14 Q Did you believe them to be having a
15 relationship?

16 A At the very end when I left, yes.

17 Q Was that one of the reasons for your leaving?

18 A One of them.

19 Q What were the others?

20 A Well, after I found out about that, that's when
21 I heard about all the other stuff that was happening.

22 Q What did you hear about all the other stuff?

23 A Well, I mean, after she went to work for
24 Mar-a-Lago then she was, I guess, recruited to go work for
25 Jeff something. I don't remember his last name.

1 Q Is that what she told you "she was recruited"?

2 A Yeah. Well, she didn't use those words. But I
3 don't know why else anybody would take -- like, they hired
4 her over there as a massage therapist, but she didn't have
5 any experience.

6 Q At Mar-a-Lago --

7 A At Mar-a-Lago, yes. Then all of a sudden one
8 day, she was working for Jeff, whatever his name was.

9 Q Let me just take a step back. You found out
10 towards the end of your relationship with Ms. Roberts that
11 she was then having a relationship with Mr. Figueroa. Is
12 that right?

13 A I don't know if it was a relationship. But,
14 yes.

15 Q Enough to cause you to think you didn't want to
16 be engaged anymore?

17 A Yes.

18 Q Did you and Ms. Roberts have a fight at that
19 time?

20 A Yes.

21 Q What do you remember about the fight? What do
22 you recall?

23 A I don't recall. I remember us having a fight
24 and then leaving not too long afterwards.

25 Q You referred to finding out all this other stuff

1 Q When you got the apartment in Oakland Park, you
2 got it with Virginia?

3 A Well, yeah. She was living with us -- and
4 Mario.

5 MS. MENNINGER: All right. I think that's
6 all I have.

7 MR. EDWARDS: Okay.

8 THE VIDEOGRAPHER: We're going off the
9 record. This concludes disc one, volume one of
10 the video-deposition of James Michael Austrich.
11 We're going off the record. The time is
12 approximately 11:20 a.m.

13 (Break taken.)

14 THE VIDEOGRAPHER: We're back on the record
15 with disc two, volume one, of the video-
16 deposition of James Michael Austrich. And the
17 time is approximately 11:23 a.m. Thank you.

18 CROSS-EXAMINATION

19 BY MR. EDWARDS:

20 Q Mr. Austrich, as you know, my name is Brad
21 Edwards, and I represent Virginia.

22 A Yes.

23 Q I'm going to ask you some follow-up questions to
24 the questions that you were asked previously.

25 All right?

1 how long we lived there.

2 Q Okay. At some point in time, though, while
3 you're living on her parent's property, it becomes 1999?

4 A Yeah, I believe.

5 Q Okay. And so when you started living at her
6 parent's property, you're 18, she's 15, but at some point
7 in time you turn 19 and she turned 16?

8 A Yes.

9 Q Okay. And at some other point in time, she
10 leaves the job at the pet store?

11 A Pet store, yeah.

12 Q And goes to work at the Mar-a-Lago?

13 A Yes. At Donald Trump's country club, yeah.

14 Q Okay. Donald Trump's country club is called the
15 Mar-a-Lago?

16 MS. MENNINGER: Objection.

17 THE WITNESS: Yeah, that's what I always
18 remember it as. Yes.

19 BY MR. EDWARDS:

20 Q Is that right?

21 MS. MENNINGER: Objection, leading. I do get
22 a chance to object. Leading.

23 BY MR. EDWARDS:

24 Q When you used the term "Mar-a-Lago" and used the
25 term "Donald Trump's country club," are we talking about

1 A But if she had to get clean for her job, she
2 would have gotten clean for the job.

3 Q Okay. Do you remember her being hired as a
4 bathroom attendant there, a locker room attendant?

5 A Now that you're saying that, some kind of
6 attendant sounds familiar. But I don't really remember.
7 All I remember is for the massage. As a -- I don't
8 remember exactly what she got hired for at Donald Trump's
9 place. But I just remember the masseuse thing.

10 But as you're saying "the attendant," the
11 attendant sounds familiar because I doubt her father would
12 hire her as a massage therapist without knowing anything.

13 Q So you had known her for some period of time
14 before she gets this job at the Mar-a-Lago, right?

15 A Right.

16 Q Did she have any massage therapy training
17 whatsoever?

18 A No.

19 Q Ever given a massage to anyone?

20 A Not that I remember.

21 Q Ever given a massage to you?

22 A Not until she was already doing the massage
23 stuff. But, no, I don't remember any kind of massage
24 training or even like an inkling for it.

25 Q Okay. Then when she goes to work for

1 Mar-a-Lago, you don't remember, I think is the words you
2 used, whether she worked there for weeks or months?

3 A Yes.

4 Q You don't remember?

5 A No, not at all.

6 Q And at the time when she gets the job at the
7 Mar-a-Lago, do you remember where you were working, if
8 anywhere?

9 A No. I mean, I think at that time, I was working
10 at one of the places. But I don't really remember where.

11 Q And then, and I believe that you used this word,
12 correct me if I'm wrong, she's recruited to work for Jeff?

13 A Yes.

14 Q And do you remember her telling you that it was
15 an assistant or somebody associated with Jeff that
16 recruited her to work with Jeff?

17 MS. MENNINGER: Objection, leading.

18 THE WITNESS: I don't remember.

19 MS. MENNINGER: Misstates the testimony.

20 THE WITNESS: Sorry. I don't remember. All
21 I remember was that somebody got her from there to
22 Jeff.

23 MR. EDWARDS: Got it.

24 BY MR. EDWARDS:

25

1 Q Then there's months; November, December.

2 A So this is the year 2000, and these are the
3 months?

4 MS. MENNINGER: Objection to this entire line
5 of questioning. The witness has no foundation for
6 talking about this particular document.

7 BY MR. EDWARDS:

8 Q Okay. So do you know how long that -- as you
9 sit here today, do you remember how long Virginia had been
10 going over to Jeff's house before she started traveling on
11 an airplane with him?

12 MS. MENNINGER: Objection, foundation.

13 THE WITNESS: No.

14 BY MR. EDWARDS:

15 Q It could be months, it could be a year?

16 MS. MENNINGER: Objection, foundation.

17 THE WITNESS: I don't think it -- I don't
18 think she was there for very long without doing
19 traveling.

20 BY MR. EDWARDS:

21 Q But in your mind, you can't tell me how long
22 "very long" is?

23 A No, I mean, I don't.

24 Q Okay. And is there anything that would tell you
25 the year or the month in which you remember Virginia first

1 going over to Jeff's house?

2 A Not really.

3 Q There's nothing I could really show you in this
4 world that would remind you right now?

5 A No.

6 Q Okay. Before going over to work with Jeff, did
7 Virginia have any massage experience?

8 A No.

9 Q When -- I think you said with respect to
10 "bringing other girls, that sounds familiar," what other
11 girls do you remember her bringing? Do you remember their
12 names?

13 A I don't remember names.

14 MS. MENNINGER: Objection, foundation.

15 BY MR. EDWARDS:

16 Q Did you ever drive any of the other girls over
17 to Jeff's house?

18 A I don't think so.

19 Q Okay. How many times did you to to Jeff's
20 house?

21 A A few times. Like, I think I went -- I think I
22 dropped her off and somebody always brought her back. I
23 don't really remember picking her up too much.

24 Q Okay. And in the beginning, she was telling you
25 that she was performing massages?

1 A Yeah, something like that.

2 Q Do you know what time of year?

3 A No.

4 Q Do you know whether the spa at Mar-a-Lago closes
5 during the summers?

6 MR. EDWARDS: Form.

7 THE WITNESS: No, I have no idea.

8 BY MS. MENNINGER:

9 Q You don't know how she got the job with Jeff?

10 A No. I know somebody -- somebody -- like,
11 that's why I said "recruited" -- that's the only word I
12 can think of -- that worked for Jeff.

13 Q Why do you use the word "recruited"?

14 A Because that's the only word -- I don't know,
15 football or everything. That's the only word I can think
16 of, you recruit somebody.

17 Q Hired her?

18 A Yeah, I guess. It was -- it was just a very
19 fast thing.

20 Q You don't know who that person was?

21 A No.

22 Q You don't know what she said to that person?

23 A No.

24 Q You don't know what that person said to her?

25 A Nope.

1 Q Do you remember her coming home and saying "I
2 got a job with Jeff"?

3 A I remember she said she got a job with Jeff.

4 Q Did she tell about that job?

5 A I think it was -- I think at the time it was for
6 massage therapy, like, she was going to be a masseuse.

7 Q And she was excited about it?

8 A Yeah.

9 Q She wasn't sad about it?

10 A Not that I remember. But I really don't
11 remember much from back then.

12 Q She wasn't crying when she came home and said "I
13 just got a job with Jeff," right?

14 A No.

15 Q You're guessing that you -- she got the job with
16 Jeff before you moved into the Bent Oak apartment, but you
17 don't know. Correct?

18 MR. EDWARDS: Form

19 THE WITNESS: Yes. But I would think we
20 would have had to have had the money by then. So
21 that was the only time she was making real good
22 money.

23 BY MS. MENNINGER:

24 Q And do you know how much that apartment cost?

25 A I know it was expensive.

1 C E R T I F I C A T E

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, Karla Layfield, RMR, Stenographic Court
5 Reporter, do hereby certify that I was authorized to and
6 did stenographically report the foregoing deposition of
7 James Michael Austrich; that said witness was duly sworn
8 to testify truthfully; and that the foregoing pages,
9 numbered 1 through 145, inclusive, constitute a true and
10 correct record of the testimony given by said witness to
11 the best of my ability.

12 I FURTHER CERTIFY that I am not a relative or
13 employee or attorney or counsel of any of the parties
14 hereto, nor a relative or employee of such attorney or
15 counsel, nor am I financially interested in the action.

16 WITNESS MY HAND this ____ day of June, 2016, at
17 Ocala, Marion County, Florida.

18

19

20

21

22

23

24

25

Karla Layfield, RMR
Stenographic Court Reporter

EXHIBIT 3

(Filed Under Seal)

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,
Plaintiff,
-against-
GHISLAINE MAXWELL,
Defendant.

_____/

250 N. Australian Avenue,
Suite 1400
West Palm Beach, Florida 33401
Friday, September 9, 2016
8:35 a.m. - 2:08 p.m.

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

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Taken before Darline M. West,
Registered Professional Reporter, Notary Public
in and for the State of Florida At Large,
pursuant to Notice of Taking Deposition filed
by the Plaintiff in the above cause.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026

(866) 624-6221

1 J. Epstein - Confidential

2 BY MR. CASSELL:

3 Q. Isn't it true that Maxwell led Virginia up
4 to your Palm Beach mansion massage room the first
5 time you met her?

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

8 THE WITNESS: Fifth.

9 BY MR. CASSELL:

10 Q. You saw Maxwell bringing Virginia up to
11 your room, true, sir?

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

14 THE WITNESS: Fifth.

15 BY MR. CASSELL:

16 Q. Isn't it true that it was standard
17 operating procedure for Maxwell to bring underage
18 girls up to your room?

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

21 THE WITNESS: Fifth.

22 BY MR. CASSELL:

23 Q. Isn't it true that it was standard
24 operating procedure for Maxwell to bring underage
25 girls up to your room for you to sexually abuse?

1 J. Epstein - Confidential

2 THE WITNESS: Fifth.

3 BY MR. CASSELL:

4 Q. In 2000, Virginia was approached by
5 Maxwell, true?

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

8 THE WITNESS: Fifth.

9 BY MR. CASSELL:

10 Q. Maxwell was one of the main women whom you
11 used to procure underage girls for sexual activities,
12 true?

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

15 THE WITNESS: Fifth.

16 BY MR. CASSELL:

17 Q. It was your understanding that Maxwell met
18 Virginia at the Mar-a-Lago Club in Palm Beach in
19 2000, true?

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

22 THE WITNESS: Fifth.

23 BY MR. CASSELL:

24 Q. In 2000, you were a member of the
25 Mar-a-Lago Club, true?

1 J. Epstein - Confidential

2 MR. PAGLIUCA: Object to form.

3 THE WITNESS: Fifth.

4 BY MR. CASSELL:

5 Q. In 2000, Ms. Maxwell had access to the
6 Mar-a-Lago Club, true?

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

9 THE WITNESS: Fifth.

10 BY MR. CASSELL:

11 Q. The reason Maxwell had access to the
12 Mar-a-Lago Club in 2000 was because of your
13 connections to the club, true?

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

16 THE WITNESS: Fifth.

17 BY MR. CASSELL:

18 Q. Maxwell was a primary co-conspirator in
19 your sexual abuse scheme, true?

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

22 THE WITNESS: Fifth.

23 BY MR. CASSELL:

24 Q. Maxwell was a primary co-conspirator in
25 your sex trafficking scheme, true?

1 J. Epstein - Confidential

2 MR. PAGLIUCA: Object to form and
3 foundation.

4 THE WITNESS: Fifth.

5 BY MR. CASSELL:

6 Q. Maxwell herself regularly participated in
7 your sexual exploitation of minors, true?

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

10 THE WITNESS: Fifth.

11 BY MR. CASSELL:

12 Q. In 2000, Maxwell herself regularly
13 participated in your sexual exploitation of minors,
14 true?

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

17 THE WITNESS: Fifth.

18 BY MR. CASSELL:

19 Q. Maxwell herself regularly participated in
20 your sexual exploitation of Virginia, true?

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

23 THE WITNESS: Fifth.

24 BY MR. CASSELL:

25 Q. Did Maxwell participate in your sexual

1 REPORTER'S CERTIFICATE

2

STATE OF FLORIDA

3 COUNTY OF PALM BEACH

4

5 I, DARLINE MARIE WEST, RPR, certify that I was
6 authorized to and did stenographically report the
7 foregoing deposition; and that the transcript is a
8 true record thereof.

9

10 I further certify that I am not a relative,
11 employee, attorney, or counsel of any of the parties,
12 nor am I a relative or employee of any of the
13 parties' attorney or counsel connected with the
14 action, nor am I financially interested in the
15 action.

16

17 Dated this 13th day of September 2016.

18

19

20

21

22

DARLINE MARIE WEST, RPR

23

24

25

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 Right?

2 A Yeah.

3 Q And she travelled the world?

4 A Uh-huh (affirmative). Yes.

5 Q Did JJ say there was anything weird about
6 her job?

7 A No.

8 MR. EDWARDS: Object to the form.

9 BY MS. MENNINGER:

10 Q Did you know whether she had any massage
11 training?

12 A I did not. Like I said, the past three --
13 three or four years before then, I had no contact
14 with her whatsoever. So I had no clue what she was
15 certified in or had done with her life.

16 Q Okay. I would like to take about a five-
17 or ten-minute break, if that's okay with you.

18 A That's fine.

19 THE VIDEOGRAPHER: The time is 10:13. We
20 are off the record.

21 The time is 10:27. We are back on the
22 record.

23 MS. MENNINGER: All right. I would like
24 to mark as an exhibit now Defendant's
25 Exhibit 4.

1 certain times and stuff. And it would just -- you
2 know, it just did not make sense to me that it it
3 was just a masseuse, you know. Like I said, he's a
4 billionaire. You can afford another masseuse. Why
5 do you need her, you know.

6 Q Do you know whether he --

7 (Brief interruption.)

8 A Let me turn this down.

9 Q Sorry.

10 A I'm sorry.

11 (Briefly off the record.)

12 Q Do you know whether he had other masseuses
13 at the time?

14 A I -- I really don't know. All I know is
15 he would have Virginia, obviously, go out and look
16 for other girls, also, to bring back, as well.

17 Q And how do you know that?

18 A Because she had explained to me that
19 sometimes when she would go out on trips that her
20 and Ms. Maxwell and stuff would go out to, like,
21 clubs and stuff and just try and pick up girls to
22 bring back, so...

23 Q That's what Virginia told you?

24 A Yes.

25 Q All right. Did any of your information --

1 (Brief interruption.)

2 A I thought I muted it.

3 Q Did any of your information come from
4 anywhere other than Virginia?

5 A No.

6 MR. EDWARDS: Object to the form.

7 A Like I said, I did not talk -- I did not
8 really speak to any of them other than, you know,
9 hi, how's it going and stuff like that, until I had
10 actually met Jeffrey. And then he was the only one
11 I ever really spoke with. I had met Ms. Maxwell a
12 couple of times, but it was never, like, you know,
13 actual conversations, so...

14 BY MS. MENNINGER:

15 Q All right. Well, let me -- when did you
16 meet Jeffrey?

17 A I'd probably say -- probably a few months
18 after I had moved in with her.

19 Q Okay. And how did you come to meet
20 Jeffrey?

21 A Dropping her off over at his mansion.

22 Q And did you drop her off using her car?

23 A Yes.

24 Q And so she just asked you: Can you take
25 me over there?

1 A Yeah.

2 Q And did she tell you where to go?

3 A Yeah. She told where he lived and
4 everything. And then obviously I got to take the
5 car, because she was going somewhere else in the
6 world and did not need it, so...

7 Q You were dropping her off for a multi-day
8 trip?

9 A Yeah. She would normally go about two
10 weeks out of every month, so...

11 Q Two weeks straight?

12 A Yeah. It was two weeks home and two weeks
13 gone, basically.

14 Q Did you always take her to his house,
15 or...

16 A Yeah. Pretty much every time I took her
17 there, it was always to his mansion. I picked her
18 up one time -- maybe it was a couple of times --
19 from the jet stream place. But pretty much every
20 single time it was at the hou- -- at the mansion.

21 (Brief interruption.)

22 Q Okay. So you're -- is that your phone?
23 I'm --

24 A No, it is. I thought I muted it.

25 Q That's okay.

1 talking like that, so...

2 Q Okay. Where did your first conversation
3 with Jeffrey take place?

4 A I'm pretty sure it was in the kitchen or
5 the living room.

6 Q Inside the house?

7 A Yeah, it was inside the house. I've never
8 seen him anywhere else other than in the mansion or
9 getting off the jet.

10 Q So you were allowed to go inside the
11 house --

12 A Yeah.

13 Q -- with Ms. Roberts?

14 A Yeah. But I never went upstairs. I've
15 only been in the kitchen, the living room, and by
16 the pool.

17 Q How many times would you estimate that you
18 had been over to the house?

19 A I mean, at least once every two weeks to
20 drop her off, you know.

21 Q Was there a period of time between 2001
22 and when she left in 2002 where she was not working
23 for Jeffrey?

24 A Yes.

25 Q What period of time was that?

1 A It was pretty much, like, when she was
2 actually working as a server. Like, basically
3 because we were trying to not have her go back
4 there. Like, she did not want to go back there.
5 And we were trying to just work without needing his
6 money, you know.

7 Q All right. And if I can re-call up that
8 Exhibit 2, can you see from here when about she was
9 working as a server?

10 A March 4th, '02.

11 Q Do you know about how long she worked
12 there?

13 A I do not. I'm not sure.

14 Q Days? Weeks? Months? Anything?

15 A I really have no clue.

16 Q Okay. How old was Ms. Roberts in 2002, if
17 you know?

18 A I'd probably say, like, 18 or so, maybe.

19 Q If her birthday is in '83 --

20 A Oh, if it's in '83, then I'd say --
21 because I was born in '82, so a year younger than me
22 would be...

23 Q 18, 19?

24 A Yeah, somewhere around there.

25 MR. EDWARDS: Object to the form.

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.

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
)
COUNTY OF VOLUSIA)

I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 5th day of July, 2016.

Leanne W. Fitzgerald, FPR
Florida Professional Reporter

Digital Certificate Authenticated
By Symantec

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 2 of 2

Pages 158 - 258

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 A Yes.

2 Q All right. And that belief was based on
3 Virginia telling you that?

4 A And JJ and Michael.

5 Q Okay. So you had heard from some other
6 people, and then later --

7 A Yeah. Before she had come back to the
8 apartment, they said that she was a masseuse for
9 this guy. And then when she came back, she told me.

10 Q All right. Once you started dating her
11 again -- I'm sorry.

12 Prior to dating her. Go back to the first
13 time you were dating her. Did she have money?

14 A No.

15 Q All right. Was she able to afford her own
16 place?

17 A No.

18 Q Was she doing massages, at all?

19 A No.

20 Q All right. Fast forward to the second
21 time when you get back together with her sometime in
22 2001.

23 A Uh-huh (affirmative).

24 Q Did she appear to you to have any massage
25 training?

1 A No.

2 Q As a seventeen-year-old at that time, was
3 she able to afford things?

4 MS. MENNINGER: Objection. Form.
5 Foundation.

6 BY MR. EDWARDS:

7 Q Did she have money --

8 A She had money.

9 Q -- while working with Jeff?

10 And was the money in the form of cash?

11 A Yes.

12 Q And did she always have cash?

13 A Yes.

14 Q And how was the apartment paid for?

15 MS. MENNINGER: Objection. Form.
16 Foundation.

17 A Cash.

18 BY MR. EDWARDS:

19 Q And did you see how she was paying for the
20 apartment?

21 A I did not watch her pay the bill, but...

22 Q Okay. When you would go to dinner, who
23 would pay?

24 A Just whoever.

25 MS. MENNINGER: Objection. Form.

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

1 went with Virginia, and you dropped her off; and
2 some occasions you went inside?

3 A Yeah.

4 Q And some of the occasions you went inside,
5 you hung out by the pool?

6 A Yes.

7 Q Or in the kitchen with the chef?

8 A Yeah.

9 Q All right. And in the total of all the
10 times that you went inside the house, you saw
11 Ms. Maxwell -- I think you got up to six times?

12 A Yeah, about five or six times.

13 Q All right. Total?

14 A Total.

15 Q That's not five or six times where --

16 A That was period, all together.

17 Q -- you brought girls?

18 A No. All together, period.

19 Q All right. I thought you said when I was
20 asking you questions that Ms. Maxwell never asked
21 you to bring girls.

22 A I don't remember saying that.

23 Q Okay. Well, tell me. When did
24 Ms. Maxwell ask you to bring a girl?

25 A Never in person. It was, like, literally,

1 like, on the phone maybe, like, once or twice.

2 Q All right. Did Ms. Maxwell call you
3 frequently?

4 A No.

5 Q All right. How many times do you think
6 Ms. Maxwell called you, at all?

7 A I'd just say that probably a just a few, a
8 couple of times. Maybe once or twice.

9 Q One or two --

10 A The majority of the time it was pretty
11 much his assistant.

12 Q How do you know Ms. Maxwell's voice?

13 A Because she sounds British.

14 Q So someone with a British accent called
15 you once or twice and asked for --

16 A Well, she told me who she was.

17 Q Okay. And what did she say when she
18 called you and asked you to bring girls?

19 A She just said, "Hi. This is Ghislaine.
20 Jeffrey was wondering if you had anybody that could
21 come over."

22 Q Okay. When did that happen?

23 A I'm not exactly sure on the time frame.

24 Q Was it after the Roadhouse Grill or
25 before?

1 Q So the thing that Virginia was tired of --
2 just so that the record is clear -- well, I'll let
3 you answer in your words. Just be clear.

4 What was it that Virginia was trying to
5 get away from and stop with respect to working at
6 Jeffrey Epstein's house?

7 MS. MENNINGER: Objection. Form,
8 foundation -- as to Virginia's thought
9 processes.

10 A To stop being used and abused.

11 BY MS. MENNINGER:

12 Q How do you know that?

13 MS. MENNINGER: Objection. Form.
14 Foundation.

15 A Due to all the things that I have come
16 to -- that have been brought to light, and in the
17 experiences that I've had, and the conversations
18 that I have had with her. Like, it just all adds up
19 to that, so...

20 BY MS. MENNINGER:

21 Q When Virginia was wanting to get out, did
22 she ever express that it was the times of work that
23 she was trying to get away from?

24 A No.

25 Q Okay. What was she specifically

1 Q Was she getting paid as much as she was
2 getting paid to work for Jeff Epstein?

3 A Definitely not.

4 Q She no longer had cash all around?

5 A Nope.

6 Q You mentioned that there was -- you had
7 several conversations with Virginia when she was
8 discussing them wanting -- or I think the word you
9 used was force, but later we tried to clarify that,
10 but them forcing her to have sex with Prince Andrew.
11 Do you remember that?

12 A Yeah.

13 Q And that you expressed that you were
14 worried for her safety if she were to decline that?

15 A Yes.

16 Q What about your conversation with Virginia
17 on that particular occasion made you worried for
18 Virginia's safety?

19 A Just the way she was talking to me. Like,
20 she just sounded scared.

21 Q And what -- what -- try to dig back and
22 remember what exactly she was saying and how she was
23 saying it, if you could just describe that for us.

24 A She said that she went to go in -- I
25 remember at one time she was talking to me about how

1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA)
3)
4 COUNTY OF VOLUSIA)

5
6
7 I, Leanne W. Fitzgerald, Court Reporter, do
8 hereby certify that I was authorized to and did
9 stenographically report the deposition of TONY
FIGUEROA; and that the foregoing transcript is a
true record of my stenographic notes.

10 I further certify that I am not a relative,
11 employee, attorney, or counsel of any of the
12 parties, nor am I a relative or employee of any of
the parties' attorneys or counsel connected with the
action, nor am I financially interested in the
action.

13 Dated this 5th day of July, 2016.
14
15
16
17
18
19

20 _____
Leanne W. Fitzgerald, FPR
Florida Professional Reporter

21 Digital Certificate Authenticated
22 By Symantec
23
24
25

EXHIBIT 5

(Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

Agren Blando Court Reporting & Video, Inc.

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN, P.L.

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Appearing on behalf of the
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BOIES, SCHILLER & FLEXNER LLP

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Appearing on behalf of the
Plaintiff

Agren Blando Court Reporting & Video, Inc.

1 APPEARANCES: (Continued)

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6 Appearing on behalf of the

Defendant

7 Also Present:

8 Brenda Rodriguez, Paralegal

Nicholas F. Borgia, CLVS Videographer

Agren Blando Court Reporting & Video, Inc.

1 you don't.

2 Do you have any reason to believe that any
3 of your previous sworn statements that you have made
4 are not true?

5 A No.

6 MR. EDWARDS: I just object and ask that
7 if we're going to ask the witness questions about any
8 of her statements in whole or in part that the
9 witness be allowed to see the statement, review the
10 statement and then answer your questions.

11 Q (BY MS. MENNINGER) You may answer the
12 question.

13 A Can you reask the question? I'm sorry.

14 Q Do you have any reason to believe that any
15 of your prior sworn statements are untrue?

16 A I have no reason to believe that my prior
17 statements are untrue.

18 Q Has anyone told you to say something that
19 was not true in connection with this case?

20 A No, ma'am.

21 Q All right. I'd like to start with a
22 lawsuit that you filed under the caption Jane Doe
23 versus Jeffrey Epstein.

24 Do you recall that lawsuit?

25 A I believe so.

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1 (Exhibit 1 marked.)

2 Q (BY MS. MENNINGER) I'm going to show you
3 an exhibit that we are marking as Defendant's
4 Exhibit 1.

5 MR. EDWARDS: Can I see that for a second?

6 I'd just like to make an objection on the
7 record for the misidentification of this document.

8 While there was a lawsuit filed under the
9 style of Jane Doe versus Jeffrey Epstein, Jane Doe
10 was not Virginia Giuffre. And the lawsuit that's now
11 being handed to this witness is Jane Doe 102 versus
12 Jeffrey Epstein.

13 Is that the document we're talking about?

14 MS. MENNINGER: Counsel, if you have an
15 objection, you should state the basis for your
16 objection in a non-leading, non-suggestive manner.

17 If you have any other record to make, you
18 can do so in a pleading filed with the Court.

19 MR. EDWARDS: Sure. My objection is
20 you've misrepresented what you've handed the witness.
21 I want to make sure that the witness is holding what
22 you actually want her to be holding as opposed to the
23 lawsuit you said that you were going to hand her.

24 That's it.

25 MS. MENNINGER: Counsel, I will ask the

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1 January 19th, 2015?

2 A At the very top of the page it says
3 January 21st, 2015.

4 Q The date it was filed. Is there a date
5 just above the signature block?

6 A Oh, yes, sorry. Yes, there is.

7 Q And what date -- what date was that?

8 A The 19th day of January, 2015.

9 Q Okay. And this document is something that
10 you believe contains the truth, correct?

11 A To the best of my knowledge at the time,
12 yes.

13 Q All right. Did something change between
14 the time then and today that makes you believe that
15 it's not all accurate?

16 A Well, as you can see, in line 4 on page 1,
17 I wasn't aware of my dates. I was just doing the
18 best to guesstimate when I actually met them.

19 Since then I've been able to find out that
20 through my Mar-a-Lago records that it was actually
21 the summer of 2000, not the summer of 1999.

22 Q Oh, I'm sorry. Are you back on page 1?

23 A On the first page.

24 Q Okay.

25 A Yes.

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1 MR. EDWARDS: Objection. Asked and
2 answered.

3 Q (BY MS. MENNINGER) You may answer.

4 MR. EDWARDS: Answer again.

5 A Again, I wouldn't say it's untrue. Untrue
6 would mean that I would have lied. And I didn't lie.
7 This was my best knowledge at the time. And I did my
8 very best to try to pinpoint time periods going back
9 such a long time ago.

10 It wasn't until I found the facts that I
11 worked at Mar-a-Lago in 2000 that I was able to
12 figure that out.

13 Q (BY MS. MENNINGER) And approximately when
14 did you learn those facts about the dates you worked
15 at Mar-a-Lago?

16 A I would say it was mid-2015.

17 Q Mid-2015 is the first time you became
18 aware of the dates --

19 A I don't know the exact --

20 Q If you could just let me finish.

21 A I'm sorry.

22 Q That's all right. Approximately mid-2015
23 when you learned the true dates that you had worked
24 at Mar-a-Lago?

25 A That's correct. Sorry.

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1 MR. EDWARDS: Object to the form.

2 A Uhm, I don't know, to be honest.

3 Q (BY MS. MENNINGER) And in what order did
4 Taco Bell, Publix and Mar-a-Lago go, and the aviary,
5 sorry?

6 A Oh, I would have to guess. Do you want me
7 to guess?

8 Q Sure.

9 A Um, I would say Publix. And then, I think
10 that's when I helped my boyfriend out at Taco Bell
11 and then I think the aviary.

12 Q And where was the Taco Bell?

13 A I was living in Fort Lauder -- I think it
14 was Fort Lauderdale. Don't quote me on that, but
15 somewhere in Florida, Broward County, something like
16 that.

17 Q And who were you living with at that time?

18 A Michael. His name is James, but Michael.

19 Q So you were living with Michael when you
20 worked at the Taco Bell, right?

21 A Yes, I was living with him.

22 Q And you worked with Michael when you
23 worked at the Publix, correct?

24 A No.

25 Q Okay. So Publix came after Taco Bell or

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1 Q Whatever address you were living at, at
2 the time you started at Mar-a-Lago.

3 A [REDACTED] Loxahatchee, Florida
4 33470.

5 Q How is it that you came to work at
6 Mar-a-Lago?

7 A My dad is a maintenance manager or
8 supervisor, I don't know what you call it. But he
9 worked in the maintenance department, mostly on
10 tennis courts, working on the air conditioning,
11 helping set up for functions. And he got me a summer
12 job there.

13 Q Okay. And you said you were on a break?

14 A Yes.

15 Q What were you on a break from?

16 A I think like -- this is going back so long
17 now, but I was attempting to get my GED. And it,
18 summer came, so school stops during the summertime
19 here in America, and I got a summer job.

20 Q All right. And where were you in school?

21 A I don't actually know the name of the
22 place. It's -- yeah, I know.

23 Q A GED place?

24 A Yeah, it was, like, I was previously in
25 Royal Palm Beach High School, but, I mean, because of

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1 Q Okay. If I can direct your attention back
2 to Defendant's Exhibit 12 at page 15. And under the
3 heading Response to Interrogatory Number 9, do you
4 see that where it says --

5 A Yes.

6 Q -- Ms. Joffrey (pronouncing) -- Giuffre,
7 excuse me, responds as follows?

8 A Yes.

9 Q Okay. It says you worked as a locker room
10 attendant for the spa area, correct?

11 A Yes.

12 Q And it says records produced in this case
13 identify the date of employment as 2000, correct?

14 A Yes.

15 Q What records that were produced in this
16 case cause you to believe that the employment began
17 in 2000?

18 A Uhm, is this going back to another
19 question that I'm not allowed to answer?

20 Q No.

21 A I have seen the documents, and I know that
22 my employment now was in 2000.

23 Q What documents did you see that caused you
24 to make that answer?

25 A The Mar-a-Lago employment documents.

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1 masseuses had their own uniforms.

2 Q What did the masseuses' uniform look like?

3 A I don't remember.

4 Q No recollection at all?

5 A None whatsoever.

6 Q Color?

7 A No, sorry. I remember mine.

8 Q Okay. How did it come to pass that you
9 were no longer working at Mar-a-Lago in two to three
10 weeks?

11 A I was approached by Ghislaine Maxwell.

12 Q Okay. And how long had you been working
13 at Mar-a-Lago when you were approached by Ghislaine
14 Maxwell?

15 A Roughly two to three weeks.

16 Q Okay. Where in the spa were you when you
17 were approached by Ghislaine Maxwell?

18 A Just outside the locker room, sitting
19 where the other girl that works there usually sits.
20 She was away from the desk. I was reading a book on
21 massage therapy.

22 Q Was that indoors or outdoors?

23 A Outdoors.

24 Q Okay. And what -- were you in the sun or
25 in the shade?

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1 wanted to aim for something higher than being a
2 locker room attendant one day. And. Yeah.

3 Q What was the name of the massage therapist
4 that you were speaking with?

5 A Oh, I have no idea.

6 Q Can you give me any physical description
7 of any of them?

8 A Um, there was one who had blonde short
9 hair. There was -- I would say there's probably
10 about four massage therapists that work in there.
11 So, I mean, I don't remember all of them.

12 Q Okay. What time of day was it?

13 MR. EDWARDS: Object to the form.

14 A Afternoon.

15 Q (BY MS. MENNINGER) How late?

16 A Anywhere between 2 to 4.

17 Q And what time did you get off of work?

18 A I believe I got off at 5.

19 Q And what was the rest of your conversation
20 with Ms. Maxwell?

21 I'm sorry, I don't think you finished.

22 A Thank you. Well, she noticed I was
23 reading the massage book. And I started to have
24 chitchat with her just about, you know, the body and
25 the anatomy and how I was interested in it. And she

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1 told me that she knew somebody who was looking for a
2 traveling masseuse.

3 And I said, Well, I don't have any
4 accreditations. This is the first book I've ever
5 read. She goes, That's okay. I know somebody. We
6 can train you. We can get you educated. You know,
7 we can help you along the way if you pass the
8 interview.

9 If the guy likes you, then, you know, it
10 will work out for you. You'll travel. You'll make
11 good money. You'll be educated, and you'll finally
12 get accredited one day.

13 Q Okay.

14 A She finished off by, you know, giving me
15 her number. And I told her I'd have to ask my dad.
16 And I called my dad. I ran over, actually, to see my
17 dad, talked to him. He said it would be okay. I
18 used the phone from Mar-a-Lago to call her and tell
19 her that I was allowed to come over.

20 And she said, Great. Meet me here at -- I
21 don't remember the exact address, but it was
22 El Brillo Way in Palm Beach -- after you get off.
23 And my dad drove me.

24 Q Did you write down her add -- the address
25 that she gave?

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1 A Yes.

2 Q Did you write down her phone number?

3 A Yes.

4 Q So did you go run and talk to your dad
5 while she was still there?

6 A No, I believe she left. And she told me
7 to ask my dad and then to give her a phone call.

8 Q Okay. Did she ask you your age when she
9 had that conversation with you?

10 A No, she did not.

11 Q Did you tell her your age?

12 A No, I did not.

13 Q And so somewhere you wrote down a phone
14 number to call her back at?

15 A Um-hum.

16 Q All right. And where did you write that
17 down?

18 A Probably just a piece of paper lying
19 around the desk.

20 Q Okay. But you don't remember?

21 A I mean, no, I don't have that piece of
22 paper anymore, so no.

23 Q Okay. And did you write down an address?

24 A Yes.

25 Q And what number do you think you called?

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1 Q When did you get your first car?

2 A After my trip to London to meet Prince
3 Andrew.

4 Q Okay. What kind of car did you get?

5 A A Dodge Dakota.

6 Q And did you purchase that yourself?

7 A Yes, I did.

8 Q And how much did it cost?

9 A I don't remember off the top of my head
10 how much it cost.

11 Q Who did you buy it from?

12 A My dad helped me bargain with it. I don't
13 remember where we bought it from.

14 Q And was the title put in your name or your
15 dad's name?

16 A I think the title was put in my name. I
17 think. I mean, my dad was with me. I've never
18 registered a car or anything like that before. So --

19 Q So that was your first time?

20 A Yes.

21 Q Memorable, right?

22 A Yes.

23 Q When you got there, a butler or someone
24 answered the door, is that what you said?

25 A No, Ghislaine answered the door.

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1 A Yes.

2 Q Who else was at home when you got home?

3 A My mom, my dad and my brother.

4 Q Which brother?

5 A Sky.

6 Q And anyone else who was there at the time?

7 A I believe Michael might have been living
8 with me at that time. So he might have been there.

9 Q Do you recall if he was there when you got
10 home?

11 A I don't really remember. I remember what
12 I did when I got home, that I basically made a
13 beeline for the bathroom.

14 Q Let me ask you a question. Michael was
15 living with you at that home, at your parents' home
16 at the time, is your best recollection today; is that
17 right?

18 A That's my best recollection, yes.

19 Q When you say living with you, were you
20 guys staying in the same room?

21 A Yes.

22 Q Were you engaged at that time to him?

23 A That was a really weird relationship. He
24 was a friend who looked after me, and he did propose
25 to me and I did say yes. But my heart was never in

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1 it.

2 He was somebody that helped me off the
3 streets so I felt compelled to say yes to him.

4 Q Okay. So when he proposed to you and you
5 said yes, did that take place before you started
6 working at Mar-a-Lago or after you started working at
7 Mar-a-Lago?

8 A Before.

9 Q And so if he were living with your parents
10 at that time, you were living in the same room; is
11 that correct?

12 A I believe so.

13 Q And your parents understood him to be your
14 fiance?

15 A I don't think they agreed with it, but I
16 think they understood it as that. I mean --

17 Q I mean, you communicated to them that he
18 had proposed and you had accepted?

19 A Yeah, in not such a pretty way. I mean,
20 they obviously weren't very happy about it. And it
21 wasn't my true intentions to ever marry him.

22 Q Okay.

23 A But I did it to make him feel okay. I
24 didn't want to be mean.

25 Q What did your mom say about your

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1 A I believe Juan Alessi was pretty much
2 within ear distance.

3 Q Could you see him?

4 A Yes.

5 Q Okay.

6 A Like I said, in ear distance, when I mean
7 ear distance like hearing, in the hearing vicinity.
8 And it was in the same time that she was asking him
9 to drop me off at home.

10 Q Okay. When you were driving home the
11 first night with Juan Alessi, did you have any
12 conversation with him?

13 A No. I had told him my address. It was a
14 very quiet ride.

15 Q Did you ride in the front or the back?

16 A The front.

17 Q It is your contention that, Ghislaine
18 Maxwell had sex with underage girls virtually every
19 day when I was around her, correct?

20 A Yes.

21 Q All right. With whom did Ghislaine
22 Maxwell have sex in your presence?

23 A Well, there's a lot of girls that were
24 involved. We weren't on a first name basis with each
25 other. I wouldn't be able to give you lists of names

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1 of girls. It was continuous.

2 Q It was continuous. Name one girl that
3 Ghislaine Maxwell had sex with in your presence.

4 A Emmy Taylor. I mean, that's a name that I
5 know well because Emmy was always around.

6 I'm trying to think of her name, sorry.
7 Sarah. Her name used to be Sarah Kellen. I think
8 she's changed it now that she's married.

9 [REDACTED] (phonetic) -- I can't
10 pronounce her last name properly, but it's around
11 those lines.

12 There were a lot of other girls that I
13 honestly can't remember their names. I'm sorry. I
14 wish I could help out more because I really would
15 like to provide more witnesses for this, but I can't
16 remember a lot of girls' names.

17 Q So those are the three names of females
18 that you observed Ghislaine Maxwell have sex with --

19 MR. EDWARDS: Object to the form.
20 Mischaracterizes testimony.

21 Q (BY MS. MENNINGER) -- is that what I
22 understand your answer to be?

23 MR. EDWARDS: Objection. Mischaracterizes
24 her testimony.

25 A Those are -- those are some three of the

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1 Q More than 20?

2 A I would say more than 20.

3 Q More than 50?

4 A I don't think more than 50, but --

5 Q Did --

6 A I don't have an exact number. I mean,
7 if -- I think if you look at the flight logs, you
8 know, that helps, but then they're not fully
9 complete. We only have flight logs to one plane and
10 then there's a time I was flown commercially into the
11 island.

12 Q Um-hum.

13 A So it's really hard for me to gauge a
14 number.

15 Q Okay. Do you have any photographs of
16 yourself on the island?

17 A I know I used to, but they would be left
18 in that apartment.

19 Q What other locations did you participate
20 in sexual contact with Ghislaine Maxwell, other than
21 the island?

22 A Everywhere. New York, Palm Beach.

23 Q Where in New York?

24 A The mansion, Jeffrey's mansion.

25 Q Okay. Anywhere else in New York?

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1 think I met Prince Andrew in 2001. And Glenn Dubin
2 and Stephen Kaufmann were, like I said, the first
3 people I was sent out to after my training. So I
4 don't know. I'm not going to give you an exact time
5 if I don't know it.

6 Q I asked you the relative order.

7 A And I'm trying to give you it.

8 Q And where does Alan Dershowitz fit into
9 that group of people?

10 A Same. I can't tell you piece by piece by
11 piece who -- I know Glenn Dubin was first.

12 Q Okay.

13 A And I know Stephen Kaufmann was one of the
14 first I was sent to. Alan Dershowitz could have been
15 between there. Between, sorry, between Glenn and
16 Stephen. The first time I was with Alan Dershowitz
17 was in New York, so I wasn't actually sent to him.
18 It actually happened at one of Jeffrey's residences.

19 (Ms. McCawley left the deposition.)

20 A So it's very hard for me to
21 chronologically give you each person individually.

22 Q (BY MS. MENNINGER) Okay. Name the other
23 politically connected and financially powerful people
24 that Ghislaine Maxwell told you to go have sex with?

25 A Again, I'm going to tell you "they"

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1 because that's how it went. They instructed me to go
2 to George Mitchell, Jean Luc Brunel, Bill Richardson,
3 another prince that I don't know his name. A guy
4 that owns a hotel, a really large hotel chain, I
5 can't remember which hotel it was. Marvin Minsky.

6 There was, you know, another foreign
7 president, I can't remember his name. He was
8 Spanish. There's a whole bunch of them that I
9 just -- it's hard for me to remember all of them.
10 You know, I was told to do something by these people
11 constantly, told to -- my whole life revolved around
12 just pleasing these men and keeping Ghislaine and
13 Jeffrey happy. Their whole entire lives revolved
14 around sex.

15 They call massages sex. They call
16 modeling sex. They call --

17 Q I asked you the names for people. Are you
18 going to tell me any other names or is that all of
19 them?

20 A I'm trying to think. That's the answer
21 I'm trying to give to you. It's that it's so hard to
22 just keep naming and naming and naming.

23 Q All right.

24 A A lot of times I would be introduced to
25 them. I didn't know --

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1 many times you want me to keep answering this
2 question. Both told me to do this, okay? They both
3 sent me to these people.

4 How many times do you want me to answer
5 this?

6 Q (BY MS. MENNINGER) I think you're
7 answering a different question so that's why I'm
8 going to ask you again. I am not asking you anything
9 about a time when Jeffrey and Ghislaine together told
10 you to go do something. I'm asking you to name a
11 single time during which Ghislaine Maxwell acting
12 alone directed you to go have sex with another
13 person?

14 MR. EDWARDS: Objection. Asked and
15 answered. Harassing. Argumentative.

16 A I've given you the names of the people
17 that Ghislaine instructed me to go have sexual
18 relations with. I am not discluding (sic) the fact
19 that Jeffrey also told me.

20 Ghislaine told me from her mouth to do
21 these things. Jeffrey told me from his mouth to do
22 these things with these people. Ghislaine instructed
23 me to do the things that I did with Jeffrey Epstein
24 on the very first meeting that I had with him. She
25 brought me there under the preclusion (sic) that I

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1 was going to be trained as a masseuse and that she
2 instructed me to take off my clothes and to give oral
3 sex to Jeffrey Epstein.

4 Q (BY MS. MENNINGER) Excuse me. I've asked
5 you for the names.

6 A I've just given you a name. Jeffrey
7 Epstein is a big name.

8 Q All right.

9 A She instructed me on that one.

10 Q So you're saying --

11 MR. EDWARDS: The witness is finishing her
12 answer right now. She's in the process of explaining
13 one of the people Ghislaine told her to have sex
14 with.

15 Q (BY MS. MENNINGER) So you're saying
16 Ghislaine Maxwell directed you to have sex with
17 Jeffrey Epstein?

18 A Correct.

19 Q Ghislaine Maxwell directed you to have sex
20 with Glenn Dubin?

21 A Correct.

22 Q What words did Ghislaine Maxwell tell you
23 to go have sex with Glenn Dubin?

24 A It was the same all the time, all right?
25 They want me to go provide these men with a massage.

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1 A When it happened?

2 Q When Ghislaine Maxwell used the words, Go
3 give a massage to Bill Richardson, where were you?

4 MR. EDWARDS: Object to the form.
5 Mischaracterizes her testimony.

6 A I can't tell you where we were. I know
7 where I was sent to. I don't know where we were when
8 she told me to do that.

9 Q (BY MS. MENNINGER) Where were you sent
10 to --

11 A New Mexico.

12 Q -- by Ghislaine Maxwell?

13 MR. EDWARDS: Object to the form.
14 Mischaracterizes her testimony again.

15 A Are you smiling at me because --

16 Q (BY MS. MENNINGER) No, I'm asking you to
17 answer the question.

18 A I have answered the question. I was sent
19 to New Mexico.

20 Q Okay. Where were you sent from?

21 A I already answered that. I don't know
22 where I was sent from.

23 Q Okay.

24 A I was flying everywhere with these people.

25 Q Where were you sent by Ghislaine Maxwell

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1 A No, she was not in the room. She was in
2 another cabana.

3 Q And other than telling you to go give the
4 owner of this large hotel chain a massage, do you
5 remember any other words she used to you to direct
6 you in what you should do?

7 A Not at the time, no.

8 Q Where did -- where were you and where was
9 Ms. Maxwell when she directed you to go have sex with
10 Marvin Minsky?

11 MR. EDWARDS: Object to the form.

12 A I don't know.

13 Q (BY MS. MENNINGER) Where did you go to
14 have sex with Marvin Minsky?

15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.

18 Q And when was that?

19 A I don't know.

20 Q Do you have any time of year?

21 A No.

22 Q Do you know how old you were?

23 A No.

24 Q Other than Glenn Dubin, Stephen Kaufmann,
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

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1 another prince, the large hotel chain owner and
2 Marvin Minsky, is there anyone else that Ghislaine
3 Maxwell directed you to go have sex with?

4 A I am definitely sure there is. But can I
5 remember everybody's name? No.

6 Q Okay. Can you remember anything else
7 about them?

8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.

13 Q Do you have any notes of all these people
14 that you were sent to?

15 A No, I don't.

16 Q Where are your notes?

17 A I burned them.

18 Q When did you burn them?

19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.

21 Q Did you have lawyers who were representing
22 you at the time you built a bonfire and burned these
23 notes?

24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

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1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.

4 Q So you burned notes of the men with whom
5 you had sex while you were represented by counsel in
6 litigation, correct?

7 MR. EDWARDS: Object to the form.

8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.

11 Q (BY MS. MENNINGER) When did you write
12 that journal?

13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.

16 Q So you did not write this journal at the
17 time it happened?

18 A No.

19 Q You started writing this journal
20 approximately a decade after you claim you finished
21 being sexually trafficked, correct?

22 A Yes.

23 Q And you started writing a journal after
24 you had a lawyer, correct?

25 A Correct.

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1 THE VIDEOGRAPHER: We're back on the
2 record at 2:55.

3 Q (BY MS. MENNINGER) Do you have any
4 photographs of yourself either nude or in a sexually
5 compromising position that you claim were taken by
6 Ghislaine Maxwell?

7 A I do not have any of those in my evidence.
8 But if you ask Ghislaine Maxwell, she would have
9 plenty.

10 Q Do you have any in your storage boxes in
11 Sydney?

12 A No.

13 Q Do you know whether your attorneys have
14 any such photographs that you claim were taken by
15 Ghislaine Maxwell?

16 A No.

17 Q You don't know or they don't have them?

18 A I don't know. And I don't think they have
19 them. If they had them, they would have told me.
20 You should ask your client. She's got plenty of
21 them.

22 Q What type of camera did Ghislaine Maxwell
23 use?

24 A It was a black camera. And it had a, I
25 don't know the types and names of them, but the lens

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1 that goes out.

2 Q Was it digital or single reflex?

3 A Again, I don't know types of cameras. I
4 mean, I use my phone for using a camera. So it's a
5 black camera and it had a lens that you could put out
6 further or bring back.

7 Q Did you ask her to take any photographs of
8 you?

9 A No. She asked to take photographs of me.

10 Q Was it a film or a digital camera?

11 A I never saw how she printed them out.

12 Q What's the first time you told anybody
13 that you had been sexually trafficked?

14 MR. EDWARDS: Form.

15 A Tony Figueroa, my ex-boyfriend, knew some
16 of the stuff that was happening, though I did not go
17 in great detail to him, being that he's my boyfriend.
18 And then the first person I really opened up to about
19 everything was my husband.

20 Q (BY MS. MENNINGER) Did you tell Tony
21 Figueroa that you were forced to have sex with
22 Jeffrey Epstein?

23 A Yes.

24 Q Did you tell Tony Figueroa you were forced
25 to have sex with Ghislaine Maxwell?

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1 any interactions with law enforcement?

2 A Yes.

3 Q When?

4 A When I tried to break away from Jeffrey
5 and Ghislaine, I started making myself unavailable.
6 And I got a job at Road House Grill. And Tony used
7 to come pick me up in the afternoons, at nighttime,
8 and he'd sit at the bar. And there's this big cup
9 that's got tips in it.

10 I was in the back room. And I had to --
11 first you have to sign out and you have to take off
12 your aprons, put your aprons away. And there's a
13 whole bunch of cleaning up stuff you have to do.

14 In that time period, Tony grabbed money
15 from a cup that had money in it. That was for the
16 bartenders for their tips. My boss called me the
17 next day. He told me that I had stolen the money,
18 which I hadn't. And I came back and I returned the
19 money after I confronted Tony about it. Gave the
20 money back to him and he said, I'm sorry, but it's
21 just law that I have to call the police. So he
22 called the police.

23 And knowing that Jeffrey has got the Palm
24 Beach Police Department in his pocket, I went to
25 Jeffrey Epstein and I told him what had happened.

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1 And Jeffrey said, Don't worry about it. Let me take
2 care of it for you.

3 Q Okay. I'm sorry. When did you have
4 interaction with law enforcement, then?

5 A What year?

6 Q Did you speak with a law enforcement
7 officer?

8 A I don't believe I spoke to them. Jeffrey
9 handled everything.

10 Q Okay. And you said that you had finished
11 your shift at -- this is at the Road House Grill,
12 correct?

13 A Correct.

14 Q You had finished your shift?

15 A Yeah, it was the end of the shift.

16 Q Okay. And you had cleaned up and were
17 checking out, correct?

18 A Yeah, it's a completely separate part of
19 the -- it's like back of the house. Do you know what
20 that means, like in waitering terms?

21 Q (Indicating.)

22 A Yeah, back of the house.

23 Q And what was -- who was this boss that you
24 spoke to?

25 A I can't remember his name.

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1 exclusivity?

2 A Yes.

3 Q What was that period?

4 A I believe it was like a three-month period
5 or something.

6 Q Okay. And what other terms of the
7 contract, do you recall?

8 A I couldn't talk to any other news
9 publication about the story.

10 Q Anything else?

11 A Not that I know of.

12 Q Were you happy when the period was up?

13 A Well, I mean, at that time I wanted to
14 write about my story. So I guess, yes, I was happy
15 when that period was up.

16 Q And you were actively writing a book at
17 that time, correct?

18 A My manuscript. I've never published it.

19 Q You were writing the manuscript at the
20 time of your period of exclusivity with Sharon
21 Churcher, correct?

22 A Those three months were just craziness. I
23 think I started after that.

24 Q You think you started writing the book
25 after the 90 days were up?

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1 A Yeah.

2 Q And then you attempted to sell that
3 manuscript, correct?

4 A I didn't attempt to sell it. I went to
5 other publications, like, what do you call them?
6 People -- I'm trying to think of the name of the
7 word. People who publish books, not like a newspaper
8 or anything. And I inquired about what they thought
9 of my manuscript and if they thought it was, you
10 know, a good story. And, yeah.

11 Q So you sent the manuscript to these people
12 for the purposes of trying to publish the book,
13 correct?

14 A Some people, yes.

15 Q And you were trying to get money from the
16 book publication, correct?

17 A Well, I wasn't going to sell it to them
18 for free.

19 Q But you were unsuccessful in finding
20 someone to publish it, correct?

21 A Well, I was always on the fence with it.
22 I wasn't too sure if I wanted to or didn't want to.
23 I was more seeking judgment based upon these people
24 who have done this plenty and plenty of times.

25 Still to this day, I mean, I've had people

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1 who have been interested in it and I still don't know
2 if I want to do it yet. I mean, I think there's a
3 lot more that can go into it, you know.

4 Q You were actively sending the manuscript
5 to people for purposes of having them reach a deal
6 with you and publish it, correct?

7 A No deal was ever talked about. What we
8 talked about was the possibility of publishing it, is
9 it publishing-worthy, would I need to get a
10 ghostwriter. You know, this is the first time I've
11 ever written a manuscript so I didn't know what I was
12 doing.

13 Q Okay. You contacted Jarred Weisfeld,
14 correct?

15 A Correct.

16 Q I'm going to mark a document as
17 Defendant's Exhibit 16. It is a composite exhibit.

18 (Exhibit 16 marked.)

19 MR. EDWARDS: Thank you.

20 Q (BY MS. MENNINGER) I'm not going to ask
21 you to read every single page of this, but if you
22 look at the first page.

23 A Um-hum.

24 Q Can you tell what this is in terms of what
25 type of document?

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1 calm the anxiety and everything down.

2 Q Before you met Jeffrey Epstein, had you
3 used any drugs?

4 A Sure, yes.

5 Q Which drugs had you used prior to meeting
6 Jeffrey Epstein?

7 A I smoked pot. I've taken Ecstasy.

8 Q Cocaine?

9 A Yeah, I would have snorted cocaine,
10 um-hum.

11 Q Did you ever abuse alcohol before meeting
12 Jeffrey Epstein?

13 A No, I was -- I wasn't even of age to be
14 able to buy it. I mean, if there was alcohol at
15 parties I would have drank it, but I wouldn't say I
16 abused it.

17 Q Okay. Were there ever occasions upon
18 which you were observed to be drunk by other people,
19 prior to meeting Jeffrey Epstein?

20 A If you're drinking, the possibility of
21 getting drunk is always there. I don't -- I can't
22 recall exact situation where that was the case,
23 but --

24 Q Were you diagnosed as a drug addict prior
25 to meeting Jeffrey Epstein?

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May 11, 2016

Sigrid S. McCawley, Esq.
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Re: Videotaped Deposition of VIRGINIA GIUFFRE
Giuffre v. Maxwell
Case No. 15-cv-07433-RWS

The aforementioned deposition is ready for reading
and signing. Please attend to this matter by
following BOTH of the items indicated below:

Call 303-296-0017 and arrange with us to read
and sign the deposition in our office.

XXX Have the deponent read your copy and sign
the signature page and amendment sheets, if
applicable; the signature page is attached.

Read the enclosed copy of the deposition and
sign the signature page and amendment
sheets, if applicable; the signature page is
attached.

XXX WITHIN 30 DAYS OF THE DATE OF THIS LETTER

By due to a trial date of

Please be sure the original signature page and
amendment sheets, if any, are SIGNED BEFORE A NOTARY
PUBLIC and returned to Agren Blando for filing with
the original deposition. A copy of these changes
should also be forwarded to counsel of record.
Thank you.

AGREN BLANDO COURT REPORTING & VIDEO, INC.

cc: All Counsel

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE VOLUME II

11/14/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

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303-296-0017

Agren Blando Court Reporting & Video, Inc.

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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Appearing on behalf of the Plaintiff

Agren Blando Court Reporting & Video, Inc.

1 APPEARANCES: (Continued)

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By Laura Menninger, Esq.

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5 lmenninger@hmflaw.com

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6 Appearing on behalf of the

Defendant

7 Also Present:

8 Ann Lundberg, Paralegal

Maryvonne Tompkins, Videographer

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1 A Yes.

2 Q And you believe the Neiman Marcus was
3 located in which city?

4 A Well, it's around Fort Lauderdale. I
5 can't tell you exactly. Fort Lauderdale is so big,
6 like Broward County? Is that the word for it?

7 Q And what did you do at Neiman Marcus?

8 A I worked in the changing rooms.

9 Q And what did you do in the changing room?

10 A I think I just like -- if I remember
11 right, I just put clothes away that people left in
12 there. Probably went out to get sizes, different
13 sizes for women who wanted different sizes of the
14 same product.

15 Q And where did you work after Neiman
16 Marcus?

17 A Taco Bell.

18 Q Did you work at Southeast Employee
19 Management Company?

20 A I don't recognize that. I don't know if
21 that's a payroll company or what it is. I don't know
22 what Southeast -- what is it called?

23 Q Southeast Employee Management Company.

24 A No, I don't remember that.

25 Q Did you ever work as a temp?

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1 A Not that I remember.

2 Q Going to different offices and filling in?

3 A No.

4 Q Did you work for Oasis Outsourcing?

5 A I don't -- I don't know if that's a
6 payroll company or if that's an actual place, but
7 that doesn't ring a bell.

8 Q Did you -- do you know how much you got
9 paid when you were working at places like Oasis
10 Outsourcing?

11 A Well, considering I don't know if I worked
12 at Oasis Outsourcing, I wouldn't even know how much I
13 got paid.

14 Q Did you review your Social Security
15 records?

16 A Yes.

17 Q You saw Oasis Outsourcing listed there?

18 A Right, but like I said, it doesn't even
19 ding a bell at all.

20 Q Do you know how much money they said you
21 made from them?

22 MS. MCCAWLEY: Objection. If you want to
23 show her the documents, she can see what amount is
24 listed and answer your questions, but if you're not
25 going to show her the document, that's the best she

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1 can do.

2 A Yeah, if you could. I'm happy to answer
3 your questions. I want to be helpful, so...

4 Q (BY MS. MENNINGER) Great. Well, do you
5 remember how much money you made from Oasis
6 Outsourcing?

7 A Like I said, I don't even remember working
8 for Oasis Outsourcing, or what it is, so I couldn't
9 tell you.

10 Q Do you remember how much money you were
11 making per hour at Neiman Marcus?

12 A No, not off the top of my head.

13 Q Do you know how many months you worked
14 there?

15 A Not long. I'd probably say -- I mean, I
16 don't know. I'm not going to guess. But around the
17 three-month mark would be my -- I don't know the
18 exact answer.

19 Q Do you remember any of your coworkers?

20 A No.

21 Q Did you work at Mannino's?

22 A Briefly, yes.

23 Q What is Mannino's?

24 A A cute little Italian restaurant in
25 Wellington.

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1 Q And what did you do at Mannino's?

2 A I did waitressing.

3 Q And how much did you make?

4 A Oh, I don't know. I don't remember.

5 Q Did you work at TGI Fridays?

6 A Again, very shortly. Short time period,
7 and I was a waitress again.

8 Q And how much did you make there?

9 A I have no idea.

10 Q Did you get fired?

11 A No.

12 Q Why did you leave?

13 A I was -- that's around the time period
14 that I was approached by -- I can't remember his
15 name, but he owned a veterinary clinic or he was a
16 vet, one of the two, and he offered me to come work
17 for him.

18 Q When you were working at TG -- TGI
19 Fridays, were you also working at the Roadhouse
20 Grill?

21 A No.

22 Q Those were not at the same time?

23 A I don't know. I don't think so. Maybe
24 consecutively like after each other.

25 Q Do you recall working at the Roadhouse

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1 Grill?

2 A Yes.

3 Q And why did you leave there?

4 A We all know that the thing that went down
5 there. Tony picked me up and took some money out of
6 a jar, and then I went to go give it back to the guy,
7 thinking that it would be all right, and it wasn't.
8 So I got fired, I think.

9 Q Sure. Okay. I show you some -- are we on
10 9?

11 MR. PAGLIUCA: Yes, 9.

12 Q (BY MS. MENNINGER) I'd like to show you
13 Defendant's Exhibit 9.

14 (Exhibit 9 marked.)

15 THE DEPONENT: Thank you.

16 Q (BY MS. MENNINGER) Do you recognize your
17 handwriting on this document?

18 A Yes.

19 Q Did you fill out an application for
20 employment --

21 A Yes.

22 Q -- on March 26th of 2002?

23 A Yes.

24 Q And where were you living at that time?

25 A I've put down my parents' address, but I

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1 and seasonal employee, correct?

2 A Correct.

3 Q And your dad was a full-time year-round
4 employee, right?

5 A Yes.

6 Q He worked there all the time.

7 A Yes.

8 Q And your job was a seasonal employment.

9 A Well, as far as I know --

10 MS. MCCAWLEY: Objection.

11 A -- I was hired for the summer, so...

12 Q (BY MS. MENNINGER) Right. Okay. So the
13 work hours, in the next paragraph, what -- what is
14 that -- can you just read that bottom paragraph for
15 us?

16 A "The Club never shuts down from
17 November 1st to Mother's Day; for 24 hours a day, 7
18 days a week, it serves the diverse needs of our
19 members. Therefore to ensure the adequate coverage
20 at all times, departments have arranged different
21 schedules for their employees."

22 Q Okay. I'm going to show you Defendant's
23 Exhibit 20.

24 A Close this one?

25 Q Yeah.

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1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Pamela J. Hansen, do hereby certify that
5 I am a Registered Professional Reporter and Notary
6 Public within the State of Colorado; that previous to
7 the commencement of the examination, the deponent was
8 duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 23rd day of November, 2016.

20 My commission expires September 3, 2018.

21
22
23 Pamela J. Hansen, CRR, RPR, RMR
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202

EXHIBIT 6

(Filed Under Seal)

ROSS NEIL SUTHERLAND GOW 11/18/2016

1 IN THE HIGH COURT OF JUSTICE
2 QUEEN'S BENCH DIVISION

3 Claim No. CR 2016 624

4 BETWEEN:

5 VIRGINIA L. GIUFFRE Applicant,
6 and
7 ROSS GOW,
8 Respondent.

9 AND:

10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF NEW YORK

12 Virginia L. Giuffre,)
13 Plaintiff,)
14 v.) Case No. 15 cv 07433 RWS
15 Ghislaine Maxwell,)
16 Defendant.)

17 Friday, November 18, 2016

18 AT: 8:27 a.m.

19 Taken at:

20
21 Essex Chambers 29,
22 81 Chancery Lane,
23 London, UK, WC2A 1DD

24 Court Reporter: Lisa Barrett, Accredited Real time
25 Reporter

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1 A. No, I have not. 08:31:58

2 Q. When you met her last night, did she assist you 08:32:01
3 in preparation for this deposition? 08:32:04

4 A. No. 08:32:07

5 Q. Did she tell you anything about this case? 08:32:10

6 A. No. 08:32:13

7 Q. Do you know Ghislaine Maxwell? 08:32:20

8 A. I do know Ms. Maxwell, yes. 08:32:24

9 Q. How did you meet her? 08:32:26

10 A. I met her in the offices of Devonshires law 08:32:27
11 firm on or around March 2011. 08:32:31

12 Q. So your first meeting was in person? 08:32:37

13 A. First meeting was in person, yes. 08:32:41

14 Q. Had you spoken to her prior to that? 08:32:42

15 A. I believe that the very first engagement was -- 08:32:45
16 I was introduced to her by my chairman Brian Basham but 08:32:50
17 I believe the first words we had were in the Devonshire 08:32:54
18 law office. 08:32:58

19 Q. Did Ms. Maxwell retain the services of you or 08:33:00
20 your firm? 08:33:03

21 A. Yes, she did. 08:33:04

22 Q. And was that in March of 2011? 08:33:06

23 A. It was. 08:33:09

24 Q. Do you have a written agreement? 08:33:11

25 A. We did have a written agreement but I can no 08:33:14

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1 longer locate that agreement. 08:33:16

2 Q. Was that agreement ever renewed? 08:33:19

3 A. It was renewed, I believe on or around the 08:33:21

4 beginning of January 2015, potentially the 2nd of January 08:33:26

5 via email. 08:33:32

6 Q. Was the agreement revised when it was renewed? 08:33:34

7 A. It wasn't revised. It was a straightforward 08:33:38

8 re-establishment of the original agreement. 08:33:42

9 Q. Is it your belief that that agreement was in 08:33:45

10 effect on January 2nd, 2015? 08:33:49

11 A. Yes. 08:33:53

12 Q. Do you recall the terms of that agreement? 08:33:59

13 A. Well, it was a re-establishment of an existing 08:34:03

14 agreement so if we go back to the original agreement, it 08:34:06

15 was to provide public relations services to Ms. Maxwell 08:34:08

16 in the matter of Guiffre and her activities. 08:34:13

17 MS. SCHULTZ: I'm marking as Exhibit 2, a 08:34:29

18 document labeled GM 00068. 08:34:31

19 (Exhibit 2 was marked for identification) 08:30:48

20 MR. DYER: Why don't you start making a pile of 08:34:38

21 them, Mr. Gow, because it may be that later on you'll be 08:34:40

22 asked to go back to them. 08:34:43

23 THE WITNESS: Yes, sir. 08:34:44

24 MR. DYER: You don't have copies for me of 08:34:55

25 these documents? 08:34:57

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1 MS. SCHULTZ: I do not have any more copies on 08:34:58
2 that. 08:34:59

3 MR. DYER: No, no, no, it's much more important 08:35:00
4 that ... just for the purpose of following things, it's 08:35:00
5 easier. 08:35:03

6 BY MS. SCHULTZ: 08:35:12

7 Q. Is ross@acuityreputation.com your email 08:35:12
8 address? 08:35:15

9 A. It is, my business email, yes. 08:35:16

10 Q. Did you send the email depicted in this 08:35:18
11 document? 08:35:21

12 A. Yes, I did. 08:35:26

13 Q. Did you send it on January 2nd, 2015? 08:35:27

14 A. I believe I did. 08:35:31

15 Q. When you sent that email were you acting 08:35:34
16 pursuant to Ms. Maxwell's retention of your services? 08:35:36

17 A. Yes, I was. 08:35:41

18 Q. Could you please tell me everything you know 08:35:58
19 about Virginia Roberts Guiffre. 08:36:00

20 MS. MENNINGER: Objection, foundation and form. 08:36:09

21 MR. DYER: You may answer. 08:36:11

22 BY MS. SCHULTZ: 08:36:11

23 Q. You testified earlier that you were retained -- 08:36:12

24 MR. DYER: Are you withdrawing that question? 08:36:15

25 BY MS. SCHULTZ: 08:36:17

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1 Q. No, I'm not, I'm not. Please -- I am 08:36:17
2 withdrawing that question. 08:36:20

3 MR. DYER: Alright. 08:36:20

4 MS. SCHULTZ: I am withdrawing that question. 08:36:20

5 BY MS. SCHULTZ: 08:36:22

6 Q. You testified previously that you were retained 08:36:22
7 to handle matters relating to Virginia Roberts Guiffre; 08:36:24
8 is that correct? 08:36:29

9 A. Correct. 08:36:30

10 Q. Okay. So you are aware of who Ms. Roberts 08:36:31
11 Guiffre is? 08:36:35

12 A. I am. 08:36:36

13 Q. Okay. Please tell me everything you know about 08:36:37
14 Virginia Roberts Guiffre, please. 08:36:39

15 MS. MENNINGER: Objection, foundation, form, 08:36:42
16 and may call for privileged materials. 08:36:43

17 BY MS. SCHULTZ: 08:36:45

18 Q. You can answer -- to the extent that anything 08:36:46
19 you testify to is not protected by a privilege. 08:36:48

20 A. Ms. Roberts first came to my attention on or 08:36:58
21 around March 2011 when I was called into a meeting with 08:37:03
22 Philip Barden and Ms. Maxwell at Devonshires law office, 08:37:08
23 that she had made -- Ms. Guiffre had made extremely 08:37:14
24 unpleasant allegations about Ms. Maxwell's private life. 08:37:20

25 We were -- Acuity Reputation, my firm 08:37:26

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1 was called in to protect Ms. Maxwell's reputation, and 08:37:29
2 to set the record straight. That was -- and that work 08:37:33
3 commenced on or around March of 2011. 08:37:42

4 Q. What do you mean by "set the record straight"? 08:37:46

5 A. Ms. Guiffre's allegations about Ms. Maxwell 08:37:51
6 were, we believe, and to this day continue to believe, 08:37:55
7 untrue, defamatory, and fantastical. And with 08:37:58
8 Devonshires' lawyers, we set about putting out -- 08:38:09
9 crafting a statement which would put Ms. Maxwell's point 08:38:15
10 of view across that Ms. Guiffre's allegations were untrue 08:38:19
11 and, frankly, abhorrent. 08:38:25

12 Q. What advice did you give Miss Maxwell as part 08:38:28
13 of your retention? 08:38:31

14 A. It is standard procedure in cases where it's 08:38:32
15 understood that a party may be defaming one's client that 08:38:36
16 one puts out a statement correcting those allegations and 08:38:42
17 providing a clearer picture of where the truth lies. So 08:38:46
18 it was very much our counsel that Ms. Maxwell put out a 08:38:49
19 statement, vehemently denying the allegations. 08:38:55

20 Q. When you testified that Ms. Guiffre, I'm going 08:38:59
21 to refer to her by just her married name, came to your 08:39:03
22 attention at that March 2011 meeting at Devonshires with 08:39:06
23 Mr. Barden and Ms. Maxwell, correct, and you learned 08:39:12
24 about her at that meeting; is that correct? 08:39:16

25 A. Correct. 08:39:18

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1 remaining, so... 08:58:14

2 I've marked as Exhibit 3 RG(UK) 00002. Do you 08:58:15

3 recognize this email? 08:58:47

4 A. I do. 08:58:48

5 Q. Did you receive this email? 08:58:49

6 A. I did, on the -- on New Year's Day 2015. 08:58:50

7 Q. Did you contact Ms. Maxwell after receiving 08:58:57

8 this email? 08:58:58

9 A. I did. 08:58:59

10 Q. Did you make any response to Mr. Ball in any 08:59:19

11 form? 08:59:22

12 A. I did. 08:59:22

13 Q. Can you tell me what you -- what response you 08:59:25

14 made? 08:59:26

15 A. Well, the response to Mr. Ball was part of a 08:59:27

16 series of responses having spoken to my client within 24 08:59:33

17 hours or so, we got back to Mr. Ball with an agreed 08:59:41

18 statement which went out to a number of media. 08:59:44

19 Q. When you say "agreed statement" can you tell me 08:59:50

20 more about what you mean? Who agreed to the statement? 08:59:52

21 A. I need to give you some context, if I may, 08:59:58

22 about that statement. 09:00:01

23 So, this is on New Year's Day. I was 09:00:02

24 in France so the email time here of 21:46, in French 09:00:04

25 time was 22:46, and I was getting up early the next 09:00:10

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1	morning to drive my family back from the south of	09:00:14
2	France to England, which is a 14-hour journey, door to	09:00:17
3	door. So on the morning of the 2nd of January,	09:00:22
4	bearing in mind that Ms. Maxwell, I think was in New	09:00:26
5	York then, she was five hours behind, so there was	09:00:28
6	quite a lot of, sort of time difference between the	09:00:30
7	various countries here, I sent her an email, I	09:00:35
8	believe, saying -- parsing this -- forwarding this	09:00:38
9	email to her saying "How do you wish to proceed?" And	09:00:41
10	then I was on the telephone -- I had two telephones in	09:00:45
11	the car, I received in excess of 30 phone calls from	09:00:50
12	various media outlets on the 2nd of January, all	09:00:54
13	asking for information about how Ms. Maxwell was	09:01:00
14	looking to respond to the latest court filings, which	09:01:04
15	were filed on the 30th of December as I understand.	09:01:10
16	And by close -- towards close of play	09:01:13
17	on the 2nd, I received an email forwarded by	09:01:16
18	Ms. Maxwell, containing a draft statement which my	09:01:33
19	understanding was the majority of which had been	09:01:36
20	drafted by Mr. Barden with a header along the lines of	09:01:39
21	"This is the agreed statement." At close of play on	09:01:44
22	the 2nd.	09:01:48
23	So I -- I was -- I had gone under the	09:01:50
24	Channel Tunnel and I was sitting on the other side and	09:01:54
25	that email, which my understanding was that it had	09:01:57

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1 been signed off by the client, effectively, was then 09:02:01
2 sent out to a number of media, including Mr. Ball and 09:02:05
3 various other UK newspapers. 09:02:09

4 Q. Mr. Gow, when you say "end of play" and "close 09:02:12
5 of play," are you referring to sending the email that's 09:02:15
6 Exhibit 2? 09:02:18

7 A. Yes, I am. 09:02:24

8 MR. DYER: My understanding is that it went to 09:02:29
9 people other than those listed? 09:02:30

10 THE WITNESS: Yes, that is -- 09:02:32

11 MR. DYER: Just a sample. 09:02:34

12 THE WITNESS: That is a sample. Everyone who 09:02:35
13 effectively -- well, the detail on this, I was driving, 09:02:37
14 so my eldest son in the back had my BlackBerry and was 09:02:40
15 trying to capture -- it was a pretty chaotic day. 09:02:43

16 Most people in the UK were on holiday. In fact, 09:02:48
17 it was a holiday weekend, our office was closed, my PA was 09:02:50
18 on holiday, so my son was basically doing an internship in 09:02:54
19 the back of the car, downloading the names of the callers 09:02:58
20 from various media outlets and -- so we had a list of 09:03:02
21 those so when I got to the car park, at the end of the 09:03:05
22 Eurotunnel thing in the UK, I had numerous names, so the 09:03:09
23 email went out to a wide range of people. 09:03:14

24 But the 30 or so calls I had is an aggregate 09:03:17
25 number, so there might have been five calls from the BBC 09:03:20

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1	10 more seconds.	09:19:50
2	MS. SCHULTZ: Understood, and I apologize.	09:19:52
3	MR. SPEARMAN: This is what, Exhibit 9?	09:19:54
4	MR. DYER: Yes.	09:19:56
5	MS. SCHULTZ: Yes.	09:19:56
6	(Exhibit 9 was marked for identification.)	09:19:56
7	BY MS. SCHULTZ:	09:20:01
8	Q. This also appears to be an email chain with you	09:20:02
9	and Ms. Maxwell; is that correct?	09:20:05
10	A. It does appear to be so.	09:20:07
11	Q. Did you send the top email of the chain that	09:20:08
12	says "Okay, G, going with this"?	09:20:10
13	A. I did.	09:20:13
14	Q. And did you receive from Ms. Maxwell, the	09:20:14
15	bottom email of that chain?	09:20:16
16	A. I believe so. Well, I believe -- yes, yeah, it	09:20:17
17	was forwarded from Ms. Maxwell, yes.	09:20:21
18	MR. DYER: Sorry, I don't quite understand that	09:20:29
19	answer.	09:20:31
20	THE WITNESS: I misspoke that. I did receive	09:20:33
21	it from Ms. Maxwell.	09:20:34
22	MR. DYER: Okay.	09:20:38
23	BY MS. SCHULTZ:	09:20:38
24	Q. The subject line does have "FW" which to me	09:20:39
25	indicates it's a forward. Do you know where the rest of	09:20:42

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1 this email chain is? 09:20:45

2 A. My understanding of this is: It was a holiday 09:20:49

3 in the UK, but Mr. Barden was not necessarily accessible, 09:20:54

4 at some point in time, so this had been sent to him 09:20:59

5 originally by Ms. Maxwell, and because he was 09:21:03

6 unavailable, she forwarded it to me for immediate action. 09:21:07

7 I therefore respond, "Okay, Ghislaine, I'll go with 09:21:14

8 this." 09:21:19

9 It is my understanding that this is 09:21:20

10 the agreed statement because the subject of the second 09:21:22

11 one is "Urgent, this is the statement" so I take that 09:21:24

12 as an instruction to send it out, as a positive 09:21:27

13 command: "This is the statement." 09:21:30

14 Q. Okay. 09:21:33

15 A. And I say, "Thanks, Philip" because I'm aware 09:21:33

16 of the fact that he had a hand, a considerable hand in 09:21:37

17 the drafting. 09:21:40

18 Q. Okay. Could I ask you to please refer back to 09:21:41

19 Exhibit 2. Looking also at Exhibit 9, Exhibit 9 appears 09:21:47

20 to have five sentences in it. Do you agree that those 09:22:03

21 same five sentences are part of the communication that is 09:22:10

22 borne in Exhibit 2? 09:22:13

23 A. Sorry, could you say that again. I'm just 09:22:18

24 following what your -- 09:22:20

25 Q. It was a bad question. Let me try that again. 09:22:21

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1 Q. Okay. Have you ever communicated anything 09:54:42
2 regarding Ms. Guiffre's criminal allegations to the press 09:54:52
3 or the media? 09:54:56

4 A. As part of a wider conversation about her 09:54:58
5 unsavory allegations about Ms. Maxwell, it's possible 09:55:04
6 that I might have done, but I can't recall the detail, 09:55:08
7 I'm afraid. 09:55:11

8 Q. Do you -- do you remember discussing that with 09:55:12
9 The Guardian? 09:55:20

10 A. No, I don't. I'm not saying I didn't but I 09:55:26
11 can't recall. You have to bear in mind, if you'd be so 09:55:29
12 kind, that I've been speaking to over 30 journalists and 09:55:34
13 media outlets about this, and I can't recall every single 09:55:39
14 -- the detail of every single conversation. 09:55:41

15 Q. Earlier you testified with regard to Exhibit 2 09:55:44
16 that in the days following sending that email, you also 09:55:47
17 communicated with other press and media outlets. Do you 09:55:53
18 recall today any of the other press and media outlets you 09:55:58
19 communicated with, in addition to those listed at the top 09:56:02
20 of that email? 09:56:07

21 A. The Guardian, The Sun, from the top of my 09:56:07
22 memory, but in addition to -- in addition to emails there 09:56:14
23 would have been telephone calls and I'm -- there may not 09:56:21
24 be a transcript of those calls, these are emails inter 09:56:25
25 alia, others, and I can't recall every single email that 09:56:33

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1 from John Swain? 09:58:42

2 A. I believe I did. 09:58:44

3 Q. That's all the questions I have about that 09:58:49
4 document. 09:58:51

5 A. Thank you. 09:58:52

6 Q. Regarding communications you made after sending 09:59:05
7 the email in Exhibit 2, I believe, and please correct me 09:59:08
8 if I'm wrong, you testified that you received 30 or more 09:59:14
9 calls that were -- that you would classify as press 09:59:17
10 inquiries regarding Ms. Guiffre; is that correct? 09:59:20

11 A. Yes. 09:59:23

12 Q. Do you recall emailing the statement to other 09:59:24
13 entities beyond what is on the list on Exhibit 2? 09:59:29

14 A. Yes, I think I answered that previously. Yes, 09:59:33
15 I mean there is a far -- I said inter alia, so there is a 09:59:36
16 wider range of people that I would have emailed it to in 09:59:40
17 response to incoming queries -- 09:59:43

18 Q. Do you -- 09:59:46

19 A. But I -- 09:59:46

20 Q. Sorry. 09:59:47

21 A. I can't remember every single one. 09:59:48

22 Q. Do you recall ever reading the statement to the 09:59:50
23 press or the media over the phone? 09:59:52

24 A. It's very possible that I would have done so, 09:59:56
25 yes. 09:59:57

ROSS NEIL SUTHERLAND GOW 11/18/2016

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1 MR. DYER: Do you mean Exhibit 2? 09:59:58

2 MS. SCHULTZ: Yes. Exhibit 2. 10:00:00

3 THE WITNESS: To be clear, Exhibit 2 was the 10:00:02
4 base document. 10:00:03

5 MS. SCHULTZ: Uh-hmm. 10:00:05

6 THE WITNESS: In addition to the 2011 March 10:00:05
7 statement. Those were the two working documents that 10:00:10
8 were always referred to, both of which -- well, the first 10:00:15
9 one was in a public domain and was on record on the 10:00:17
10 Devonshires -- on -- with Devonshires name at the top on 10:00:21
11 PR Newswire which is a global delivery service. So that 10:00:24
12 was easily accessible by people. And the second one was 10:00:28
13 the -- further to the 2nd of January 2015. 10:00:31

14 BY MS. SCHULTZ: 10:00:38

15 Q. To the extent you can recall or could estimate, 10:00:37
16 how many other emails do you believe you sent bearing 10:00:40
17 that statement that's in Exhibit 2? 10:00:43

18 A. I really can't remember but certainly more than 10:00:47
19 six and probably less than 30, somewhere in between. 10:00:48

20 Any time there was an incoming query 10:00:52
21 it was either dealt with on the telephone by referring 10:00:54
22 them back to the two statements of March 2011 and 10:00:57
23 January 2015 or someone would email them the 10:01:00
24 statement. So no one was left unanswered, broadly, is 10:01:06
25 the -- is where we were. But I can't remember every 10:01:09

ROSS NEIL SUTHERLAND GOW 11/18/2016

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1 single person we reached out to.

10:01:13

2 Q. Okay. So is it your testimony that you reached
3 out to individuals who did not first contact you?

10:01:19

10:01:22

4 A. No. We were in response mode.

10:01:26

5 Q. Okay.

10:01:28

6 A. There was enough to do responding to incoming
7 queries, I wouldn't have been making more work, to be
8 honest.

10:01:29

10:01:33

10:01:38

9 Q. Alright.

10:01:38

10 MR. DYER: So journalists paid no attention to
11 your "No further communication will be provided on the
12 matter."

10:01:42

10:01:44

10:01:47

13 A. No -- that's quite correct, sir, and there
14 probably was a -- it's regarded as tweaking their tales.

10:01:48

10:01:50

15 BY MS. SCHULTZ:

10:02:00

16 Q. Mr. Gow, I'm handing you what I've marked as
17 Exhibit 14. The Bates number is RG(UK) 000004. I'll
18 give you a moment to look at it.

10:02:00

10:02:04

10:02:17

19 (Exhibit 14 was marked for identification.)

10:02:19

20 BY MS. SCHULTZ:

10:02:43

21 Q. Thank you. Toward the top of the page there is
22 a passage that reads:

10:02:44

10:02:47

23 "Apologies, should read

10:02:49

24 Virgina Roberts all the way

10:02:51

25 through." [As read]

10:02:53

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 109

1 servicing ultra high net worth clients, individuals, 11:23:14
2 corporates, governments and NGOs, managing their media 11:23:20
3 relations and protecting their reputation. 11:23:25

4 Q. Approximately how long have you been providing 11:23:27
5 such services? 11:23:30

6 A. Acuity was set up in 2010. 11:23:31

7 (Exhibit 26 was marked for identification.) 11:23:42

8 BY MS. SCHULTZ:

9 Q. I'm going to hand you what I've marked as 11:23:37
10 Exhibit 26. 11:23:39

11 A. Thank you. 11:23:43

12 Q. Does this document fairly depict pages from 11:23:53
13 your -- from Acuity Reputation's website? 11:23:55

14 A. It does. 11:23:59

15 Q. Do you see where it says "We manage reputation 11:24:02
16 and forge opinion through public relations, strategic 11:24:06
17 communications and high level networking"? 11:24:10

18 A. I do. 11:24:13

19 Q. Is that a true statement? 11:24:13

20 A. Say it again. Sorry. 11:24:15

21 Q. Is that a true statement? 11:24:17

22 A. It is, yes. I wrote that statement. 11:24:18

23 MR. DYER: Sorry, you read it or you wrote it? 11:24:20

24 THE WITNESS: I wrote it, so I do recognize it. 11:24:22

25 BY MS. SCHULTZ: 11:24:28

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 110

1 Q. Is it correct that public relations and 11:24:29
2 strategic communications are things that you personally 11:24:31
3 do as part of your professional activities? 11:24:36

4 A. I personally -- I'm involved in public 11:24:40
5 relations and strategic communications, yes. 11:24:44

6 Q. Is it correct that the media is the intended 11:24:48
7 recipient of this strategic communications. 11:24:51

8 A. It's -- the -- it's a larger ground than just 11:24:55
9 the media. There may be lobbyists, government think 11:24:59
10 tanks, focus groups, government departments. 11:25:05

11 Q. Would it be fair to say that the media is often 11:25:09
12 the intended recipient of strategic communications? 11:25:12

13 A. It is a frequent recipient. 11:25:16

14 Q. Referent recipient? 11:25:18

15 A. But not the sole recipient. 11:25:21

16 Q. Okay. Do you see where your website claims 11:25:23
17 that your company has "excellent relationships with the 11:25:25
18 media"? 11:25:28

19 A. I do. 11:25:30

20 Q. Is that a true statement? 11:25:31

21 A. That is true, yeah. 11:25:33

22 MR. DYER: Except Mr. Syson. 11:25:37

23 THE WITNESS: Except Mr. Syson, sir. 11:25:38

24 MS. SCHULTZ: Of course. 11:25:40

25 THE WITNESS: And representatives of the Daily 11:25:40

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 111

1 Mirror. 11:25:41

2 BY MS. SCHULTZ: 11:25:42

3 Q. Is it correct that you advertise your 11:25:42

4 "excellent relationships with the media" because your 11:25:46

5 services often include giving communications to the media 11:25:49

6 on behalf of your clients? 11:25:52

7 A. Yes. 11:25:55

8 MS. SCHULTZ: That's all I have for right now. 11:25:59

9 MR. DYER: I just wanted to ask you one 11:26:01

10 question about Exhibit 25. This was the email from the 11:26:03

11 New York Daily News to you which you sent on to 11:26:13

12 Ms. Maxwell and Mr. Barden. 11:26:17

13 THE WITNESS: Yes. 11:26:20

14 MR. DYER: Do you recollect whether you were 11:26:29

15 asked to make any statement in response to this matter, 11:26:30

16 the issue of proceedings in September of last year? 11:26:35

17 THE WITNESS: I don't, sir. It's always been 11:26:40

18 the case that Mr. Barden and I were encouraging 11:26:45

19 Ms. Maxwell to make a statement, but she was very 11:26:50

20 reluctant to do so. 11:26:57

21 MR. DYER: Right. I think you've got him to 11:27:00

22 accept that up until some time March, April, May, he may 11:27:02

23 have spoken to Mr. Syson. And that was the last 11:27:06

24 statement that there's any evidence of him making about 11:27:10

25 this matter. But on the evidence, as I understand it, 11:27:14

ROSS NEIL SUTHERLAND GOW 11/18/2016

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1 CERTIFICATE OF COURT REPORTER

2

3 I, Lisa M. Barrett, an Accredited Real-time Reporter,
4 hereby certify that the testimony of the witness Ross
5 Neil Sutherland Gow in the foregoing transcript,
6 numbered pages 1 through 122, taken on this 18th day
7 of November, 2016 was recorded by me in machine
8 shorthand and was thereafter transcribed by me; and
9 that the foregoing transcript is a true and accurate
10 verbatim record of the said testimony.

11

12

13 I further certify that I am not a relative, employee,
14 counsel or financially involved with any of the
15 parties to the within cause, nor am I an employee or
16 relative of any counsel for the parties, nor am I, in
17 any way, interested in the outcome of the within
18 cause.

19

20

21 Signed:

22 Name: Lisa M. Barrett, RPR, CRR, CRC, CSR

23 Date:

24

25

EXHIBIT 7

(Filed 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 20, 2016

9:12 a.m.

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

Deposition of [REDACTED] pursuant
to notice, taken by Plaintiff, at the
offices of Podhurst Orseck, 25 West
Flagler Street, Suite 800, Miami, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

1 [REDACTED] - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. When you got to his house, you were
4 requested to give a massage?

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

7 THE WITNESS: I don't exactly remember. I
8 don't remember if I was asked in the kitchen.
9 I don't remember if -- I don't remember.

10 BY MR. EDWARDS:

11 Q. Massage was part of the game, though?

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

14 THE WITNESS: I don't remember. I'm
15 sorry.

16 BY MR. EDWARDS:

17 Q. But even during this deposition today, we
18 have described at times you giving him a massage?

19 A. Yes. You're asking about my first
20 encounter, though.

21 Q. Sorry, I'm just trying to sum up the whole
22 thing.

23 A. Okay.

24 Q. Was massage part of the lure to get you
25 specifically to his house?

1 [REDACTED] - CONFIDENTIAL

2 A. Yes.

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

5 BY MR. EDWARDS:

6 Q. And at the time, you are 15, 16 or 17
7 years old?

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

10 THE WITNESS: Yes.

11 BY MR. EDWARDS:

12 Q. No massage experience?

13 A. No.

14 Q. You were told to bring other girls to his
15 house?

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

18 THE WITNESS: After a while, yes.

19 BY MR. EDWARDS:

20 Q. These massages were turned sexual by
21 Jeffrey, as opposed to by anyone else?

22 A. Jeffrey took my clothes off without my
23 consent the first time I met him.

24 Q. The massages were scheduled by people
25 working for Jeffrey?

1 [REDACTED] - CONFIDENTIAL

2 A. I don't recall.

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

5 BY MR. EDWARDS:

6 Q. Jeffrey Epstein, during these massages,
7 would use sex toys or have sex toys used?

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

10 THE WITNESS: Well, at that point, it's no
11 longer a massage. Something else is going on.
12 But, yes, he would take out adult toys and
13 different things.

14 BY MR. EDWARDS:

15 Q. While you were a teenager, Jeffrey Epstein
16 asked you to live with him?

17 A. Yes. He wanted me to be emancipated.

18 Q. Jeffrey Epstein encouraged girl-on-girl
19 sex?

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

22 THE WITNESS: Yes.

23 BY MR. EDWARDS:

24 Q. And after you cooperated with the police,
25 you were intimidated by people working for Jeffrey

1 [REDACTED] - CONFIDENTIAL

2 Epstein?

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

5 THE WITNESS: Yes.

6 MR. EDWARDS: All right. I don't have
7 anything further for you. I apologize that we
8 even had to go through this, all right?

9 THE WITNESS: Okay.

10 E X A M I N A T I O N

11 BY MR. PAGLIUCA:

12 Q. Ms. [REDACTED], by name is Jeff Pagluica. I
13 live in Denver, Colorado. And, like you, I don't
14 want to be here today either, okay? I would rather
15 be in Denver.

16 I just want to -- as I understand it, and
17 I'm not trying to get into any of your treatment
18 over the last, let's say, 10 years, because I don't
19 know how long it's been, but as I understand what
20 you and your lawyer have said here today, you have
21 been involved in some number of years of therapy, in
22 which the purpose -- part of the purpose of the
23 therapy has been to forget all of these events that
24 Mr. Edwards was asking you questions about; is that
25 correct?

1 [REDACTED] - CONFIDENTIAL

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA)

4 COUNTY OF MIAMI-DADE)

5

I, the undersigned authority, certify that
6 [REDACTED] personally appeared before me and
was duly sworn.

7 WITNESS my hand and official seal this
23rd day of June, 2016.

8

9

Kelli Ann Willis, RPR, CRR
10 Notary Public, State of Florida
Commission FF928291, Expires 2-16-20

11 + + + + + + + + + + + + + + + +

12 CERTIFICATE

13 STATE OF FLORIDA)

14 COUNTY OF MIAMI-DADE)

15 I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
16 Reporter do hereby certify that I was
authorized to and did stenographically report the
17 foregoing deposition of [REDACTED] that a
review of the transcript was not requested; and
18 that the transcript is a true record of my
stenographic notes.

19 I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
20 of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
21 with the action, nor am I financially interested
in the action.

22 Dated this 23rd day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25

EXHIBIT 8

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,
Plaintiff,

v.

CASE NO.:15-CV-07433-RWS

GHISLAINE MAXWELL,

Defendants.

January 25, 2017

9:05 a.m. - 12:44 p.m.

401 E. Las Olas Boulevard

Fort Lauderdale, Florida

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

VIDEOTAPE DEPOSITION OF SARAH KELLEN

Taken on behalf of the before
Michael J. D'Amato, RMR, Notary Public in and for the
State of Florida at Large, pursuant to Notice of Taking
Deposition in the above cause.

Job # 293966

1 decline to answer.

2 Q. Who introduced you to Ghislaine Maxwell?

3 A. On advice of my counsel I must invoke my Fifth
4 and Sixth Amendment privilege which I understand
5 protect the innocent and therefore I must unfortunately
6 decline to answer.

7 Q. When you met Ghislaine Maxwell was she working
8 for Jeffrey Epstein?

9 A. On advice of my counsel I must invoke my Fifth
10 and Sixth Amendment privilege which I understand
11 protect the innocent and therefore I must unfortunately
12 decline to answer.

13 Q. Did Ghislaine Maxwell work as a recruiter for
14 young girls for Jeffrey Epstein when you met her?

15 A. On advice of my counsel I must invoke my Fifth
16 and Sixth Amendment privilege which I understand
17 protect the innocent and therefore I must unfortunately
18 decline to answer.

19 Q. I'm defining young girls to mean females the
20 ages 12 to 23. Do you understand that?

21 A. On advice of my counsel I must invoke my Fifth
22 and Sixth Amendment privilege which I understand
23 protect the innocent and therefore I must unfortunately
24 decline to answer.

25 Q. Didn't Ghislaine Maxwell approach you to

1 girls for sex with Jeffrey Epstein?

2 A. On advice of my counsel I must invoke my Fifth
3 and Sixth Amendment privilege which I understand
4 protect the innocent and therefore I must unfortunately
5 decline to answer.

6 Q. Did you assist Ghislaine Maxwell in procuring
7 underage girls for sex with Jeffrey Epstein?

8 A. On advice of my counsel I must invoke my Fifth
9 and Sixth Amendment privilege which I understand
10 protect the innocent and therefore I must unfortunately
11 decline to answer.

12 Q. Isn't it true that Ghislaine Maxwell would
13 recruit underage girls for sex and sex acts with
14 Jeffrey Epstein?

15 A. On advice of my counsel I must invoke my Fifth
16 and Sixth Amendment privilege which I understand
17 protect the innocent and therefore I must unfortunately
18 decline to answer.

19 Q. Did Ghislaine Maxwell give you information on
20 what underage girls she had contact information for?

21 A. On advice of my counsel I must invoke my Fifth
22 and Sixth Amendment privilege which I understand
23 protect the innocent and therefore I must unfortunately
24 decline to answer.

25 Q. Did Ghislaine Maxwell teach you to offer these

1 CERTIFICATE OF COURT REPORTER

2 I, MICHAEL J. D'AMATO, a Registered Merit Reporter
3 and Notary Public in and for the State of Florida at
4 Large, do HEREBY CERTIFY that I was authorized to and
5 did stenographically report the deposition of SARAH
6 KELLEN; that a review of the transcript was requested;
7 and that the foregoing transcript, pages from 1 to 197,
8 is a true and accurate record of my stenographic notes.

9 I FURTHER CERTIFY that I am not a relative,
10 employee, attorney, or counsel of any of the parties, nor
11 am I a relative or employee of any of the parties'
12 attorney or counsel connected with the action, nor am I
13 financially interested in the action.

14 Dated this 27th day of January 2017.

15 _____
16 MICHAEL J. D'AMATO,
17 Registered Merit Reporter
18
19
20
21
22
23
24
25

EXHIBIT 9

(Filed Under Seal)

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

VIDEOTAPE DEPOSITION OF: PETER KENT
November 29, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

PURSUANT TO SUBPOENA AND NOTICE, the videotape deposition of PETER KENT was taken on behalf of the Plaintiff at 150 East 10th Avenue, Denver, Colorado 80230, on November 29, 2016, at 9:00 a.m., before Sandra L. Bray, Registered Diplomate Reporter, Certified Realtime Reporter, and Notary Public within Colorado.

MAGNA LEGAL SERVICES
(866) 624-6221



1 MS. McCAWLEY: I'm just asking about his
2 retention, which I believe is discoverable under
3 Rule 26.

4 Q. (BY MS. McCAWLEY) Do you recall whether
5 you were retained to perform work for one expert or
6 two experts?

7 THE DEPONENT: Am I allowed to answer
8 this?

9 MR. PAGLIUCA: Yes.

10 A. I actually don't recall.

11 Q. (BY MS. McCAWLEY) Do you know whether
12 you were provided with one report or two reports when
13 you initially were retained?

14 A. I believe I was provided with both the
15 reports at the same time.

16 Q. Let me turn to about halfway back. So
17 it's going to be -- there's markings on the bottom.
18 It says PK-005.

19 A. Yes.

20 Q. And it indicates an amount there, an
21 invoice. Is this one of your invoices?

22 A. Yes.

23 Q. It indicates an amount of \$17,875?

24 A. Yes.

25 Q. Is that the total amount you've been

1 paid, with the exception of what we paid you for your
2 testimony here today, in this matter?

3 A. I think so. What date was this?

4 Q. It looks like it's dated October 29th,
5 2016.

6 A. Oh, yes. In that case, yes.

7 Q. Have you performed any work after that
8 date that you've been paid for?

9 A. Only in preparation for this deposition.

10 Q. Have you been paid for that work?

11 A. No.

12 Q. No. Have you invoiced that work yet?

13 A. No.

14 Q. All right. And then I'm going to turn
15 you to the next page -- please don't put it away
16 yet -- which appear to be invoices.

17 A. Time sheets.

18 Q. Time sheets? You tell me.

19 A. It's a time sheet.

20 Q. Is this typically how you record your
21 time when you're doing expert work?

22 A. Yes.

23 Q. And this indicates -- the first entry is
24 on 9/28/2016. Is that when you commenced work on this
25 matter?

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, SANDRA L. BRAY, Registered Diplomat
Reporter, Certified Realtime Reporter, and Notary
Public ID 20084001729, State of Colorado, do hereby
certify that previous to the commencement of the
examination, the said PETER KENT was duly sworn by me
to testify to the truth in relations to the matters in
controversy between the parties hereto; that the said
deposition was taken in machine shorthand by me at the
time and place aforesaid and was thereafter reduced to
typewritten form; that the foregoing is a true
transcript of the questions asked, testimony given,
and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my
signature this 8th of December, 2016.

My commission expires January 16, 2020.

X Reading and Signing was requested.

Reading and Signing was waived.

Reading and Signing is not required.

EXHIBIT 10

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,
Plaintiff,

Case No.: 15-cv-07433-RWS

-against-

GHISLAINE MAXWELL,
Defendant.

- - - - - x

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

Videotaped oral deposition of NADIA
MARCINKO, taken pursuant to notice, was
held at the law offices of BOIES
SCHILLER & FLEXNER, LLP, 575 Lexington
Avenue, New York, New York commencing
January 17, 2017, 1:04 p.m., before
Leslie Fagin, a Court Reporter and
Notary Public in the State of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

1 N. Marcinko - Confidential

2 reside, a dwelling that is paid for by either
3 Jeffrey Epstein or Ghislaine Maxwell?

4 A. Same answer.

5 Q. Do you know Jeffrey Epstein?

6 A. Same answer.

7 Q. Do you know Ghislaine Maxwell?

8 A. Same answer.

9 Q. How old were you when you met
10 either Jeffrey Epstein or Ghislaine Maxwell?

11 A. Same answer.

12 Q. Who introduced to you Ghislaine
13 Maxwell?

14 A. Same answer.

15 Q. When you met Ghislaine Maxwell, was
16 she working for Jeffrey Epstein?

17 A. Same answer.

18 Q. Did Ghislaine Maxwell work as a
19 recruiter of young girls for Jeffrey Epstein
20 when you met her?

21 A. Same answer.

22 Q. Did Ghislaine Maxwell instruct you
23 to recruit young girls for Jeffrey Epstein?

24 A. Same answer.

25 Q. Did Ghislaine Maxwell encourage

1 N. Marcinko - Confidential

2 Ghislaine Maxwell?

3 A. Same answer.

4 Q. Have you observed Ghislaine Maxwell
5 and Jeffrey Epstein offering these young
6 girls money, education or other things of
7 value during the massage to get that young
8 girl to return to Jeffrey Epstein for sexual
9 purposes?

10 A. Same answer.

11 Q. Have you observed Ghislaine Maxwell
12 and Jeffrey Epstein convert what started as a
13 massage with these young girls into something
14 sexual?

15 A. Same answer.

16 Q. Have you understood when I talk
17 about young girls, I'm talking about girls
18 between the age range of 13 and 23 years old?

19 A. Same answer.

20 Q. Have you observed that when
21 Ghislaine Maxwell and Jeffrey Epstein used
22 the term, massage, it always includes sex?

23 A. Same answer.

24 Q. Was massage a word used by
25 Ghislaine Maxwell to lure girls into sex with

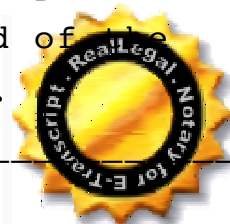
CERTIFICATE

I HEREBY CERTIFY that the witness,
NADIA MARCINKO, was duly sworn by me and that
the deposition is a true record of the
testimony given by the witness.


Leslie Fagin,

Registered Professional Reporter

Dated: January 17, 2017



(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)

EXHIBIT 11

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

****CONFIDENTIAL****

Videotaped deposition of GHISLAINE
MAXWELL, taken pursuant to subpoena, was
held at the law offices of BOIES
SCHILLER & FLEXNER, 575 Lexington
Avenue, New York, New York, commencing
April 22, 2016, 9:04 a.m., on the above
date, before Leslie Fagin, a Court
Reporter and Notary Public in the State
of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026

1 G Maxwell - Confidential

2 Q. I'm not talking about friends. I'm
3 talking about individuals --

4 MR. PAGLIUCA: I'm going to object
5 to you interrupting the witness who was
6 answering your question. The question
7 was, have you ever seen anyone, female
8 under the age of 18 at the house and
9 that's the question she was answering.
10 If you want to strike that question and
11 ask another question, feel free, but let
12 the witness respond, please.

13 MS. MCCAWLEY: I will do that.

14 Q. Have you ever observed a female
15 under the age of 18 at Jeffrey Epstein's home
16 that was not a friend, a child -- one of your
17 friend's children?

18 A. Again, I can't testify to that
19 because I have no idea what you are talking
20 about.

21 Q. You have no idea what I'm talking
22 about in the sense you never observed a
23 female under the age of 18 at Jeffrey
24 Epstein's home that was not one of your
25 friend's children, is that correct?

1 G Maxwell - Confidential

2 MR. PAGLIUCA: Object to the form
3 and foundation.

4 A. How would I possibly know how
5 someone is when they are at his house. You
6 are asking me to do that. I cannot possibly
7 testify to that. As far as I'm concerned,
8 everyone who came to his house was an adult
9 professional person.

10 Q. Are you familiar with the police
11 report that was issued in respect to the
12 investigation in this matter?

13 MR. PAGLIUCA: Object to the form
14 and foundation.

15 Q. Are you familiar with the police
16 report that was used in this matter, the
17 investigation of Jeffrey Epstein, has been
18 produced as a document in this matter?

19 A. I have seen a police report.

20 (Maxwell Exhibit 1, police report,
21 marked for identification.)

22 Q. The police report that you have in
23 front of you, can you turn to page 28 of that
24 report, the numbers are on the top right-hand
25 corner.

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2 -- just another one of Virginia's many
3 fictitious lies and stories to make this a
4 salacious event to get interest and press.
5 It's absolute rubbish.

6 Q. Were you in charge of hiring
7 individuals to provide massages for Jeffrey
8 Epstein?

9 A. My job included hiring many people.
10 There were six homes. As I sit here, I hired
11 assistants, I hired architects, I hired
12 decorators, I hired cooks, I hired cleaners,
13 I hired gardeners, I hired pool people, I
14 hired pilots, I hired all sorts of people.

15 In the course and a very small part
16 of my job was from from time to time to find
17 adult professional massage therapists for
18 Jeffrey.

19 Q. When you say adult professional
20 massage therapists, where did you find these
21 massage therapists?

22 A. From time to time I would visit
23 professional spas, I would receive a massage
24 and if the massage was good I would ask that
25 man or woman if they did home visits.

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2 Q. Did you hire her?

3 A. First of all, I don't hire girls
4 like that, so let's be clear, I already
5 testified to that, and I have no idea what
6 you are referring to.

7 Q. When you say girls like that, what
8 do you mean?

9 A. I hire people who are professional
10 at the house. You are asking if I hired
11 somebody to do what, I don't know what you
12 are talking about. I hired people to work in
13 the homes.

14 Q. What was Nadia Marcinkova doing?

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

17 A. I have no idea what Nadia
18 Marcinkova was doing. I didn't hire her and
19 I don't know what you are referring to.

20 Q. You met Nadia Marcinkova?

21 A. I testified I did.

22 Q. Did she work for Jeffrey Epstein?

23 A. I have no idea what she did.

24 Q. Have you flown on planes with Nadia
25 Marcinkova?

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2 MR. PAGLIUCA: Objection to the
3 form and foundation.

4 A. I don't know what that means,
5 masseuse obligation, I don't know what you
6 are referring to. Would you like to ask the
7 question properly?

8 Q. I think it was proper. I will ask
9 it again.

10 Did you ever assist in getting
11 Virginia Roberts a cell phone to use during
12 the time that she worked for Jeffrey Epstein?

13 A. I have no recollection of doing
14 anything of that nature.

15 Q. Did you ever tell Virginia that you
16 wanted her to have a cell phone so that she
17 could be on call regularly?

18 A. I have no recollection of that
19 conversation.

20 Q. How often would Virginia come over
21 to the house in Palm Beach to give massages?

22 MR. PAGLIUCA: Objection to the
23 form and foundation.

24 A. Ask the question again, please.

25 Q. How often did Virginia Roberts come

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2 over to the house in Palm Beach to give
3 massages?

4 A. It's important to understand that I
5 wasn't with Jeffrey all the time. In fact, I
6 was only in the house less than half the
7 time, so I cannot testify to when I wasn't in
8 the house how often she came when I wasn't
9 there.

10 What I can say is that I barely
11 would remember her, if not for all of this
12 rubbish, I probably wouldn't remember her at
13 all, except she did come from time to time
14 but I don't recollect her coming as often as
15 she portrayed herself.

16 Q. How many times a day on an average
17 day would Jeffrey Epstein get a massage?

18 MR. PAGLIUCA: Objection to the
19 form and foundation.

20 A. When I was at the house and when I
21 was there with him, he received a massage, on
22 average, about once a day.

23 Q. Just once?

24 A. Yes.

25 Q. Were there days when he received

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2 four or five?

3 MR. PAGLIUCA: Objection to the
4 form and foundation.

5 A. When I was present at the house, I
6 never saw something like that.

7 Q. Do you know if Virginia was
8 required to be on call at all times to come
9 to the house if Jeffrey wanted her there?

10 MR. PAGLIUCA: Objection to the
11 form and foundation.

12 A. I have no idea of the arrangements
13 that Virginia made with Jeffrey.

14 Q. When Virginia was in New York,
15 would Virginia sleep at Jeffrey's mansion in
16 New York?

17 MR. PAGLIUCA: Objection to the
18 form and foundation.

19 A. I don't recollect her being in New
20 York and I have no idea where she slept.

21 Q. You don't ever remember seeing
22 Virginia Roberts in New York?

23 MR. PAGLIUCA: Objection to the
24 form and foundation.

25 A. I would barely recollect her at

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2 him at any of those homes?

3 A. Again, Virginia is absolutely
4 totally lying. This is a subject of
5 defamation about Virginia and the lies she
6 has told and one of lies she told was that
7 President Clinton was on the island where I
8 was present. Absolutely 1000 percent that is
9 a flat out total fabrication and lie.

10 Q. You did fly on planes, Jeffrey
11 Epstein's planes with President Clinton, is
12 that correct?

13 A. I have flown, yes.

14 Q. Would it be fair to say that
15 President Clinton and Jeffrey are friends?

16 A. I wouldn't be able to characterize
17 it like that, no.

18 Q. Are they acquaintances?

19 A. I wouldn't categorize it.

20 Q. He just allowed him to use his
21 plane?

22 A. I couldn't categorize Jeffrey's
23 relationship.

24 Q. When you were on the plane with
25 Jeffrey and President Clinton, did you

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2 building that you would have seen when you
3 were on the trip in Europe?

4 MR. PAGLIUCA: Objection to the
5 form and foundation.

6 A. I can't possibly answer that.

7 Q. Do you recall Virginia ever taking
8 pictures?

9 A. I barely recall Virginia, period.

10 Q. Do you recall her ever taking
11 pictures?

12 A. No, I don't.

13 Q. I'm going to direct your attention,
14 still within the flight logs to -- starting
15 on the next page from where you just were
16 which is going to be 000747. And the date at
17 the top says 2001, you will see March and I'm
18 directing your attention down towards the
19 middle to the bottom where you will see the
20 numbers 27, 29 and 31.

21 A. Uh-huh.

22 Q. And we've got actually I'm going to
23 direct your attention to the one that starts
24 with TEB for Teterboro to SAF for Santa Fe
25 and the one below it Santa Fe to Palm Beach

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2 her but you would have to ask Jeffrey what he
3 brought her on the trip for.

4 Q. But she would travel with him when
5 there was a work trip like this?

6 A. I can't -- I'm seeing that she is
7 on this flight but I have no idea what she is
8 doing, he invited her, it would not be my
9 job.

10 Q. What about Nadia Bjorlin, would she
11 regularly travel with Jeffrey on flights?

12 A. I have no idea, you would have to
13 look through the flight logs. I have no
14 idea.

15 Q. Your recollection is -- what is
16 your recollection, do you recollect Nadia
17 traveling often on flights with Jeffrey?

18 A. Absolutely not. No, not at all. I
19 don't recollect her actually on the flight at
20 all.

21 Q. I think you can set that aside for
22 the moment.

23 (Maxwell Exhibit 9, message pad
24 pages, marked for identification.)

25 Q. We will mark as Exhibit 9 these

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2 excerpts from -- we will identify what they
3 are but from the message pads.

4 Did you want to correct anything?

5 A. I want to make an addendum.

6 Would you mind rereading the last
7 question back to me?

8 (Record read.)

9 A. I also just want to say that at
10 this point I cannot recollect flying to
11 parties. Jeffrey went for work so -- was
12 this in Santa Fe, this flight as well.

13 Q. The flight we were looking at, yes
14 but it was to Santa Fe --

15 A. I don't recall going to any parties
16 in Santa Fe at any time but certainly flying
17 to Santa Fe for a party seems highly
18 improbable.

19 Q. So I'm going to direct your
20 attention to the document that I set before
21 you which is Bates number SAO 01456 and it
22 has different Bates numbers because it's a
23 smaller version of the larger production.
24 These are the pages I will be asking about.

25 In the time that you were working

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2 with Jeffrey in Palm Beach, do you recall a
3 process for taking, anybody at the house
4 taking messages when incoming phone calls
5 came in?

6 A. You are supposed to take a message
7 and receive the message and write the message
8 down. Who was the message was for, what time
9 it was taken and who took it and what the
10 message was, obviously.

11 Q. Does what's in front of you look
12 familiar with respect to the message pads
13 that you would have used at the house?

14 A. It is familiar.

15 Q. I'm going to direct your attention
16 to the second page of it?

17 MR. PAGLIUCA: These all have SAO
18 numbers on them or Bates ranges and I
19 don't see any of your Bates ranges on
20 these. I know you have produced message
21 pads but those have your Bates range
22 numbers on them and I'm wondering if
23 these are different documents.

24 MS. McCAWLEY: It's the same, just
25 ours have the Bates underneath them.

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2 believe. Do you believe --

3 A. I can only testify --

4 Q. Let me finish the question so the
5 record is clear.

6 Do you believe Jeffrey Epstein
7 sexually abused minors?

8 MR. PAGLIUCA: Objection to the
9 form and foundation.

10 Q. You can answer.

11 A. I can only testify to what I know.
12 I know that Virginia is a liar and I know
13 what she testified is a lie. So I can only
14 testify to what I know to be a falsehood and
15 half those falsehoods are enormous and so I
16 can only categorically deny everything she
17 has said and that is the only thing I can
18 talk about because I have no knowledge of
19 anything else.

20 Q. I'm not asking about Virginia. I'm
21 asking whether you believe that Jeffrey
22 Epstein sexually abused minors?

23 A. Again, I repeat, I can only go on
24 what I know and what I know is a falsehood
25 based on what Virginia said.

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2 What I'm asking you is whether you
3 believe Jeffrey Epstein abused minors?

4 MR. PAGLIUCA: I object to the form
5 and you made your record, she answered
6 the question. A fair reading of her
7 answer is she doesn't have a belief
8 because she doesn't have any personal
9 knowledge.

10 MS. McCAWLEY: Now you are
11 testifying for the witness. Let her
12 answer the question.

13 MR. PAGLIUCA: It's a fair answer
14 to the question.

15 A. Again, I testified my only personal
16 knowledge concerns Virginia and everything
17 Virginia has said is an absolute lie, which
18 is why we are here in this room. If you are
19 asking me to testify about things I have no
20 knowledge of other than the police report
21 that you showed me, I am not in a position to
22 make a statement based on that because you
23 are asking me to speculate and I cannot
24 speculate.

25 Q. I'm asking you about your belief.

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2 I'm not asking you to speculate at all. I'm
3 asking what you believe.

4 A. You are asking me to speculate and
5 I won't speculate.

6 Q. I'm not asking you to speculate.
7 I'm asking what you believe.

8 MR. PAGLIUCA: She answered the
9 question and we can move on.

10 MS. McCAWLEY: She hasn't answered
11 the question.

12 MR. PAGLIUCA: We are not going to
13 engage in this debate. She answered the
14 question. If you want to mark it and
15 move to compel an answer to the
16 question, have at it. Okay.

17 Q. Ms. Maxwell, is it your belief that
18 Jeffrey Epstein interacted sexually with
19 minors?

20 A. Again, you are asking me the same
21 type of question exactly but with different
22 language. Again, my only knowledge of
23 somebody who claims these things that I have
24 personal knowledge of is Virginia. Virginia
25 is an absolute liar and everything she has

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2 said is a lie. Therefore, based on those
3 lies I cannot speculate on what anybody else
4 did or didn't do because if Virginia is the
5 example of what that story is and everything
6 she said is false, so everything that leads
7 from that is false.

8 Q. So the 30 other minor children in
9 the police report are also telling lies about
10 being sexually abused during massages with
11 Mr. Epstein?

12 MR. PAGLIUCA: Objection to the
13 form and foundation. Counsel, can you
14 show me in these police reports who the
15 30 minors are?

16 MS. MCCAWLEY: I'm asking my
17 question.

18 MR. PAGLIUCA: You are making a
19 representation about numbers, you are
20 making a representation on the record
21 about what people said or didn't say.
22 We have no knowledge about that. These
23 are all redacted records so these are
24 bad questions. They don't lead to any
25 admissible evidence. It is only being

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2 A. I'm carrying on.

3 Q. I'm sorry. I thought you were
4 done.

5 A. Please. Her statement also that
6 she was driven by her father to Palm Beach.
7 She was driven by her mother, as a matter of
8 fact. Her whole entire characterization of
9 the first meeting with Jeffrey, as I was
10 outside speaking to her mother.

11 Q. Let me stop you there, so we don't
12 get too far ahead. Let me make sure I
13 understand your testimony.

14 The first, in the first piece when
15 you were talking, I believe you said and
16 correct me if I'm wrong, that her
17 characterization of the first meeting at
18 Mar-a-Lago was an obvious lie.

19 What part of that meeting was an
20 obvious lie?

21 A. By her own testimony, all her
22 various many different descriptions of what
23 she was or wasn't or where she was or wasn't,
24 they have all changed. She was either front
25 of house or bathroom attendant. I don't know

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2 what she was, so just by her own words, one
3 doesn't know what's true and what isn't true.

4 Q. Are you saying what position she
5 said she was working in, is that what you are
6 considering the obvious lie?

7 A. I said inconsistency within her own
8 statement from everything, so in the
9 beginning it starts off with different
10 statements.

11 Q. Then I believe you said the second
12 piece was that she was driven by her father?

13 A. I said she was driven by her
14 mother.

15 Q. That's the obvious lie?

16 A. It's an obvious lie to me.

17 Q. You said why don't you state it in
18 your own words but the characterization of
19 how she was with Jeffrey, what about that is
20 an obvious lie?

21 A. I was standing outside talking to
22 her mother so the entire story is a
23 fabrication.

24 Q. Did she not have sex with Jeffrey
25 Epstein during that first massage?

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2 up to the room and start a massage?

3 A. He would not.

4 Q. So the young girls in the police
5 report who say they came over and were led up
6 to the room on the first day, would they be
7 wrong about that?

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

10 A. I can't comment what happened when
11 I was not at the house. I can only comment
12 when I was at the house.

13 Q. Was there ever a time where a woman
14 came to the house for the first time to give
15 a massage and Jeffrey had the massage that
16 day?

17 MR. PAGLIUCA: Objection to the
18 form and foundation.

19 A. Can we talk about adult
20 professional masseuses, please?

21 Q. I'm asking, whether adult or
22 underage?

23 A. I'm not interested in talking about
24 underage. I can only testify to what I know,
25 professional masseuses, adult, I cannot

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2 testify to anything else.

3 Q. Why can't you testify to an
4 underage girl that came over and was led up
5 to the room for a massage?

6 MR. PAGLIUCA: Objection to the
7 form and foundation.

8 A. The police records you are
9 referring to?

10 Q. You are saying that didn't happen.
11 You're saying I can only testify to adults
12 that came for an interview and were led up to
13 the room. Why can't you testify to whether
14 an underage girl was brought in for an
15 interview and led up --

16 MR. PAGLIUCA: Objection to the
17 form and foundation.

18 Q. Go ahead.

19 A. Can you reask the question.

20 Q. Why can't you testify as to an
21 underage girl who came over for an interview
22 and then was then led up to the room for the
23 massage?

24 A. You've mangled your entire
25 question. Can you please reask that in a way

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2 present at the home when a girl under the age
3 of 18 came over for the purposes of giving a
4 massage?

5 MR. PAGLIUCA: Objection to the
6 form and foundation.

7 Q. You can answer.

8 A. You can be a professional masseuse
9 at 17 in Florida, so as far as I am aware, a
10 professional masseuse showed up for a
11 massage. There is nothing inappropriate or
12 incorrect about that and your
13 mischaracterization of it, I think is
14 unfortunate.

15 Q. How many teenagers did he have that
16 were professional masseuses that worked in
17 his home?

18 MR. PAGLIUCA: Objection to the
19 form and foundation.

20 Q. How many?

21 A. First of all, I am not aware of
22 teenagers who worked in his home.

23 Q. You are aware of Virginia Roberts
24 and you've stated she was 17 and she worked
25 for him, correct?

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2 A. No. I did not state that at all,
3 you are mischaracterizing my words and what I
4 said.

5 What I said was that we can all
6 agree and I think at this point there is not
7 one person in this room, however much you
8 would like her to be younger, to say she was
9 not 17 because that has been a very offensive
10 thing that you have all done. So she was 17.
11 At 17 you are allowed to be a professional
12 masseuse and as far as I'm concerned, she was
13 a professional masseuse. There is nothing
14 inappropriate or incorrect about her coming
15 at that time to give a massage. Her entire
16 characterization of her first time at the
17 house was to me an obvious lie, given it was
18 impossible for her entire story to take place
19 given I was speaking to her mother the entire
20 she was at the house.

21 Q. So it was impossible that day, that
22 first day she came and you were speaking to
23 the mother, for Virginia Roberts to have had
24 sex with Jeffrey Epstein during the time that
25 you were outside with her mother?

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2 absolutely 1000 percent that she did not have
3 any type of sexual relations as described by
4 you in your court papers that took place
5 because those allegedly according to her lies
6 involved some aspect of me.

7 As I was standing outside with her
8 mother the entire time, her entire story is a
9 lie. Therefore, to ask me what she did or
10 didn't do during that time, I can only
11 testify to what she said about me, which was
12 1000 percent false.

13 Q. So let's not take the first time,
14 let's take the next time she comes.

15 A. No no, how can do you that, when
16 the basis of this entire horrible story that
17 you have put out is based on this first
18 appalling story that was written, repeated,
19 multiply by the press that lied about her
20 age, lied about the first time she came, lied
21 about and characterized the entire first
22 time. I have been so absolutely appalled by
23 her story and appalled by the entire
24 characterization of it and I apologize
25 sincerely for my banging at the table

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2 earlier, I hope you accept my apology. It's
3 borne out of years of feeling the pressure of
4 this entire lie that she has perpetrated from
5 our first time and whilst I recognize that
6 was -- I hope you forgive me sincerely
7 because it was just the length of time that
8 that terrible story has been told and retold
9 and rehashed when I know it to be 100 percent
10 false.

11 Q. So not the first time she came, but
12 the second time she came or the third time or
13 any time she came, did you ever participate
14 in a massage with her in Jeffrey Epstein's
15 room?

16 A. I have never participated at any
17 time with Virginia in a massage with Jeffrey.

18 Q. Have you ever participated at any
19 time with Virginia in any kind of sexual
20 contact or sexual touching with Jeffrey and
21 Virginia?

22 A. I have not.

23 Q. So we were going through the list
24 of obvious lies and you were talking about
25 the first time which I believe we have

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2 of 18?

3 A. I think we can establish what adult
4 would be.

5 Q. You never interviewed or I know you
6 don't want to use the word hired, whatever
7 your role was, you brought in an exercise
8 instructor that was under the age of 18 to
9 work at the house?

10 MR. PAGLIUCA: Object to the form
11 and foundation.

12 A. I have already testified that what
13 I was responsible for was to find people who
14 had competencies in whatever area I was
15 looking for. The competencies I was looking
16 for were professional and adult.

17 Q. So there was no exercise instructor
18 that worked at the Palm Beach house or the
19 New York house or the New Mexico house or the
20 USVI under the age of 18?

21 MR. PAGLIUCA: Objection to the
22 form and foundation.

23 A. I can only testify to when I was at
24 the house.

25 Q. Yes.

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2 MR. PAGLIUCA: Objection to the
3 form and foundation.

4 A. That's not how I would characterize
5 that.

6 Q. How would you characterize it?

7 A. I have testified that I'm
8 responsible for finding professional people
9 to work in the homes, age appropriate adult
10 people, so from pool attendants, to
11 gardeners, to chefs, to housekeepers, to
12 butlers, to chauffeurs and one of the
13 functions was to be able to answer the
14 telephones and in the context of finding
15 someone to answer the telephones, I did look
16 to try to find appropriate people to answer
17 the phones.

18 Q. So did you find Johanna for
19 purposes of that role?

20 A. So in the course of looking for
21 somebody to answer phones at the house,
22 Johanna was one of the people who said that
23 she was willing to answer phones.

24 Q. Did you approach her at her school
25 campus?

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2 Q. List all of the girls you met and
3 brought to Jeffrey Epstein's home for the
4 purposes of employment that were under the
5 age of 18?

6 MR. PAGLIUCA: Objection to the
7 form and foundation.

8 A. I've already characterized my job
9 was to find people, adults, professional
10 people to do the jobs I listed before; pool
11 person, secretary, house person, chef, pilot,
12 architect.

13 Q. I'm asking about individuals under
14 the age of 18, not adult persons, people
15 under the age of 18.

16 A. I looked for people or tried to
17 find people to fill professional jobs in
18 professional situations.

19 Q. So Virginia Roberts was under the
20 age of 18, correct?

21 A. I think we've established that
22 Virginia was 17.

23 Q. Is she the -- sorry, go ahead.

24 Is she the only individual that you
25 met for purposes of hiring someone for

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2 MR. PAGLIUCA: Object to the form
3 and foundation.

4 A. If you want to ask Jeffrey
5 questions about me, you would have to ask
6 him.

7 Q. Have you ever been involved in any
8 illegal activity in your lifetime?

9 MR. PAGLIUCA: Objection to the
10 form and foundation.

11 A. I can't think of anything I have
12 done that is illegal.

13 Q. Have you ever been arrested?

14 A. I have a DUI in the U.K. a long
15 time ago.

16 Q. Is that the only arrest you have on
17 your record?

18 A. Yes.

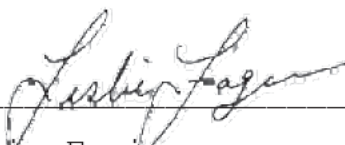
19 Q. I will mark as Maxwell 22 this
20 email?

21 (Maxwell Exhibit 22, email, marked
22 for identification.)

23 Q. This is dated January 21, 2015.
24 It's from Jeffrey Epstein to you, forwarding
25 the Guardian and I would like you to look at

CERTIFICATE

I HEREBY CERTIFY that the witness,
GHISLAINE MAXWELL, was duly sworn by me and
that the deposition is a true record of the
testimony given by the witness.



Leslie Fagin,

Registered Professional Reporter

Dated: April 22, 2016



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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
VIRGINIA L. GIUFFRE,

Plaintiff,

-against- Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

****CONFIDENTIAL****

Continued Videotaped Deposition of
GHISLAINE MAXWELL, the Defendant herein,
taken pursuant to subpoena, was held at
the law offices of Boies, Schiller &
Flexner, LLP, 575 Lexington Avenue, New
York, New York, commencing July 22,
2016, 9:04 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

- - -

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2 thought. I really don't recall her, so it's
3 hard for me to testify what I thought about
4 her age at the time.

5 Q. Was Virginia, in the period of
6 around 2000, the youngest person that, as you
7 understood it, was giving Mr. Epstein
8 massages?

9 MR. PAGLIUCA: Object to the form
10 and foundation.

11 A. Again, I can't testify to her age,
12 but everybody else that I can recall seemed
13 to be again, like I would say, adults.

14 Q. You didn't think Virginia was an
15 adult, did you?

16 MR. PAGLIUCA: Object to the form
17 and foundation.

18 A. Like I said, I don't recall her. I
19 don't recall thinking about -- my memory is
20 of adults giving Jeffrey massages, and as I
21 don't really remember Virginia around that
22 time, I don't know what I think.

23 Q. You do remember Virginia, about
24 that time back in the 2000s, giving
25 Mr. Epstein massages?

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2 MR. PAGLIUCA: Object to the form
3 and foundation.

4 A. I barely remember her at all.

5 Q. Whether you barely remember her or
6 not, you do remember that back in the period
7 around 2000, Virginia was giving Mr. Epstein
8 massages, right?

9 MR. PAGLIUCA: Objection to form
10 and foundation.

11 A. Only in the most general terms. It
12 would be somebody who would give him a
13 massage, and that's it.

14 Q. During the period of time back in
15 the period around 2000, when you knew that
16 Virginia was somebody who would give
17 Mr. Epstein a massage, was she somebody who
18 you considered an adult?

19 MR. PAGLIUCA: Objection to form
20 and foundation.

21 A. I didn't consider her at all
22 because she is not somebody that I really
23 interacted with.

24 Q. It is your testimony that Virginia
25 was not somebody that you interacted with, is

Confidential

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1 G. Maxwell - Confidential

2 Q. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

5 A. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

7 A. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

11 Q. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

Confidential

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1 G. Maxwell - Confidential

2 Q. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

20 [REDACTED]

21 MR. PAGLIUCA: Objection to form

22 and foundation.

23 [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

Confidential

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1 G. Maxwell - Confidential

2 and foundation.

3 A. No.

4 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. PAGLIUCA: Objection to form

9 and foundation.

10 A. I don't know.

11 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. PAGLIUCA: Objection to form

18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin

21 Islands?

22 MR. PAGLIUCA: Objection to form

23 and foundation.

24 A. No.

25 [REDACTED]

Confidential

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MR. PAGLIUCA: Objection to form
and foundation.

Confidential

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1 G. Maxwell - Confidential

2 it to something in the case.

3 MR. BOIES: I think it's tied, but
4 if you instruct her not to answer, it
5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] .

14 A. Can you repeat the question?

15 Q. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [REDACTED]
[REDACTED]
24 . [REDACTED]
[REDACTED]

Confidential

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CERTIFICATE

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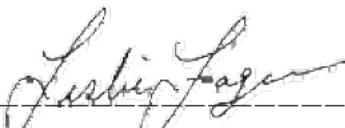
8

I HEREBY CERTIFY that GHISLAINE
MAXWELL, was duly sworn by me and that the
deposition is a true record of the testimony
given by the witness.

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Leslie Fagin,

Registered Professional Reporter

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Dated: July 22, 2016

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(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)



EXHIBIT 12

(Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

LYNN TRUDE MILLER

05/24/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

Agren Blando Court Reporting & Video, Inc.

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
LYNN TRUDE MILLER May 24, 2016

VIRGINIA L. GIUFFRE,
Plaintiff,

v.

GHISLAINE MAXWELL,
Defendant.

APPEARANCES:

S.J. QUINNEY COLLEGE OF LAW, UNIVERSITY OF UTAH
By Paul G. Cassell, Esq.
383 S. University Street
Salt Lake City, UT 84112
Phone: 801.585.5202
Cassellp@law.utah.edu
Appearing on behalf of the
Plaintiff

HUTCHINSON BLACK AND COOK, LLC
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Phone: 303.442.6514
clune@hbcboulder.com
Appearing on behalf of the
Deponent

Agren Blando Court Reporting & Video, Inc.

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.

3 By Laura A. Menninger, Esq.

4 Jeffrey S. Pagliuca, Esq.

5 150 East 10th Avenue

6 Denver, CO 80203

7 Phone: 303.831.7364

8 lmenninger@hmflaw.com

9 jpagliuca@hmflaw.com

10 Appearing on behalf of the

11 Defendant

12 Also Present:

13 Maryvonne Tompkins, Videographer

Agren Blando Court Reporting & Video, Inc.

1 A Because I wasn't told any different.

2 Q Do you know where any -- any source of
3 that information came from? Was it Sky?

4 A It came from Sky.

5 Q Okay. And what do you recall him telling
6 you about when Virginia stopped working at
7 Mar-a-Lago?

8 A She was in a discussion with Mrs. Maxwell
9 to educate her and take her under her wing and be her
10 new momma. That's what I heard.

11 Q Okay. And who told you that?

12 A Sky.

13 Q Okay. And do you remember when Sky told
14 you that?

15 A I don't remember.

16 Q Okay. Did you learn anything else about
17 that, other than what you just said?

18 A No.

19 Q Okay. Do you know where she went to work
20 after Mar-a-Lago?

21 A I think she went with Mrs. Maxwell.

22 Q But do you know where, physically?

23 A Physically, Sky and I dropped her off one
24 day at Mrs. Maxwell's. I did not speak with
25 Mrs. Maxwell. I didn't have anything to say to her.

Agren Blando Court Reporting & Video, Inc.

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE
3 COUNTY OF DENVER)

4 I, Kelly A. Mackereth, do hereby certify
5 that I am a Registered Professional Reporter and
6 Notary Public within the State of Colorado; that
7 previous to the commencement of the examination, the
8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 31st day of May, 2016.

20 My commission expires April 21, 2019.

21
22 Kelly A. Mackereth, CRR, RPR, CSR
23 216 - 16th Street, Suite 600
24 Denver, Colorado 80202
25

EXHIBIT 13

(Filed 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 RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. All right.

4 Was SG a licensed massage therapist?

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

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q. And at 14 years old, are you permitted to
10 be a licensed massage therapist?

11 A. Not to my knowledge.

12 Q. After speaking with SG and understanding
13 her account of what took place at Jeffrey Epstein's
14 home, what -- what happened next in the
15 investigation?

16 A. At some point the investigation was turned
17 over to me for follow-up. I know there was trash
18 pulled that was done prior to -- and surveillance
19 that was done prior to the case being turned over to
20 me; and trash pulls being an investigative technique
21 to acquire intelligence, information and evidence.

22 Q. Okay. If we go to page 17, at the top,
23 and, first of all, I will ask you from memory, do
24 you remember if [REDACTED] identified Jeffrey
25 Epstein in a photo lineup?

1 JOSEPH RE CAREY - CONFIDENTIAL

2 "a cross-reference"?

3 A. Uh-huh.

4 Q. How is a cross-reference performed? What
5 does that mean?

6 A. When -- when something is
7 cross-referenced, they -- they jot down license
8 plate numbers. They conduct their background into
9 the individuals; photographs, computer research.

10 Q. A cross-reference of Jeffrey Epstein's
11 residence revealed which affiliated names?

12 A. It revealed Nadia Marcinkova, Ghislane
13 Maxwell, Mark Epstein. Also, the cross-reference,
14 any previous reports from the residence as well.

15 Q. During your investigation, did you learn
16 of any involvement that Nadia Marcinkova had with
17 any of the activities you were investigating?

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

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. And what involvement did you learn of
23 Nadia Marcinkova?

24 MR. PAGLIUCA: Object to form and
25 foundation.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 THE WITNESS: Nadia was involved sexually
3 with one of the victims at Epstein's request.

4 BY MR. EDWARDS:

5 Q. Okay. Do you remember which victim you're
6 remembering right now?

7 A. AH.

8 Q. Okay. If it indicates in the report that
9 she was also sexually involved with other victims,
10 is that possible as well?

11 A. Yes.

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

14 BY MR. EDWARDS:

15 Q. Okay. The one that you remember in your
16 mind is AH?

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

19 THE WITNESS: Correct.

20 BY MR. EDWARDS:

21 Q. The other name that is on here as a
22 cross-reference is Ghislane Maxwell.

23 Did you speak with Ghislane Maxwell?

24 A. I did not.

25 Q. Did you ever attempt to speak with

1 JOSEPH RECAREY - 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 RECAREY - CONFIDENTIAL

2 actually gave massages at Epstein's home?

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

5 BY MR. EDWARDS:

6 Q. Approximately.

7 MR. PAGLIUCA: Same objection.

8 THE WITNESS: I would say approximately
9 30; 30, 33.

10 BY MR. EDWARDS:

11 Q. And of the 30, 33 or so girls, how many
12 had massage experience?

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

15 THE WITNESS: I believe two of them may
16 have been -- two of them.

17 BY MR. EDWARDS:

18 Q. Okay. And as we go through this report,
19 you may remember the names?

20 A. Correct. Let me correct myself. I
21 believe only one had.

22 Q. And was that -- was that one of similar
23 age to the other girls?

24 MR. PAGLIUCA: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 foundation.

3 THE WITNESS: Yes, I did.

4 BY MR. EDWARDS:

5 Q. And were trash pulls done at the property
6 of Jeffrey Epstein?

7 A. Yes.

8 Q. What is the purpose of a trash pull, and
9 what is a trash pull?

10 A. A trash pull is when property is
11 discarded, such as trash, we coordinate with the
12 sanitation department to collect the trash, once it
13 leaves the property, and it's put into an empty well
14 of the trash truck. We acquire the bags, and we
15 sift through the contents of the trash.

16 Q. Did you or another detective from the unit
17 observe each step of the trash pull to make sure
18 that you had a good chain of custody of the
19 evidence?

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

22 THE WITNESS: Yes. The members of
23 the OCTAN unit at that time did.

24 BY MR. EDWARDS:

25 Q. Okay. And what is that process?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. The process --

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

5 THE WITNESS: The process is when the --
6 once you coordinate a trash pull with the
7 sanitation supervisor, you meet with the
8 sanitation worker and ensure that either the
9 can that he's going to place in the well is
10 completely empty and you physically observe him
11 collect the trash and place it into the empty
12 container. And then you follow him to a
13 disclosed area, and we retrieve the bags and
14 you sift through the trash.

15 BY MR. EDWARDS:

16 Q. Okay. What were you looking for in terms
17 of evidentiary value from these trash pulls?

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

20 THE WITNESS: We were looking for any --
21 any form of identification. You were looking
22 for -- to gather any kind of intelligence
23 and/or evidence.

24 BY MR. EDWARDS:

25 Q. Okay. If we go to page 20 of the report,

1 JOSEPH RECAREY - 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 RECAREY - 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. And then some of the remaining messages,
4 "Johanna, work Sunday at 4 p.m.; A, Monday after
5 school; left message for Courtney W and NT," are
6 these individuals that you later learned were
7 underaged girls that had been to Jeffrey Epstein's
8 home?

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

11 THE WITNESS: That's correct.

12 BY MR. EDWARDS:

13 Q. What types of documents do you remember
14 retrieving from the trash pulls from Jeffrey
15 Epstein's home?

16 A. There was numerous items. It was a lot of
17 handwritten notes on different -- different pads of
18 paper. Some of the pads had names on it, whether it
19 was Epstein, whether it was Ghislane Maxwell,
20 whether it was -- there were phone messages.

21 When I say "phone messages," I mean, you
22 know, the kind that come in a book. They are carbon
23 copied, so the yellow copy always stays with the
24 book, but the white copy is torn off. So there was
25 always a carbon copy of the actual phone message.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Correct.

3 BY MR. EDWARDS:

4 Q. And let me go back to the beginning six
5 pages of that exhibit, No. 4.

6 MR. PAGLIUCA: Why don't we just make a
7 copy of it now if we're going to ask questions
8 about it? I'm not trying to --

9 MR. EDWARDS: Yes, I know. It's just the
10 first six pages.

11 (A discussion was held off the record,
12 after which the following proceedings were
13 held:)

14 THE VIDEOGRAPHER: On the record at 10:32.

15 BY MR. EDWARDS:

16 Q. And what were some of the items that were
17 found in -- well, are the documents that you're
18 holding, 1 through 6, an accurate reflection of the
19 items that were found in Jeffrey Epstein's home
20 during the search warrant execution?

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

23 THE WITNESS: Yes.

24 BY MR. EDWARDS:

25 Q. And I believe that you described that some

1 JOSEPH RECAREY - CONFIDENTIAL

2 of the -- that the house appeared to be -- I don't
3 remember the word you used -- sanitized, for lack of
4 a better word?

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

7 BY MR. EDWARDS:

8 Q. How did you know that?

9 A. The computers had been removed from the
10 home.

11 Q. How did you know the computers were
12 removed?

13 A. Based on -- based on the dangling wires
14 left behind, the monitors left, but the actual CPU
15 of it was missing.

16 When you went into the bedroom of Jeffrey
17 Epstein, everything was removed from the -- the
18 shelves, from the armoire.

19 Q. Did you find nude photographs of girls?

20 A. Yes.

21 Q. All right.

22 And what did you do with that evidence?

23 A. That was collected and placed into our
24 crime scene unit.

25 Q. And where is that evidence today?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Any evidence that was not returned to its
3 rightful owner was turned over to the FBI.

4 Q. And evidence which would be nude
5 photographs of girls would be evidence not turned
6 back over to Epstein?

7 A. Correct.

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

10 THE WITNESS: Some of the items that were
11 collected were later found to be personal items
12 of the houseman, Janush. I recall reviewing
13 his personal photographs on -- on a micro SD
14 card for, like, photos of him and his wife or
15 girlfriend at the time.

16 BY MR. EDWARDS:

17 Q. And the underaged girls that you had
18 spoken with during your investigation, had they
19 described seeing photographs of naked girls in the
20 house?

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

23 THE WITNESS: Yes, they did.

24 BY MR. EDWARDS:

25 Q. That's something that ran consistent with

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 RECAREY - 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

1 JOSEPH RE CAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. In these messages, did you see messages
4 that were taken by Ghislane Maxwell or left for
5 Ghislane Maxwell?

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

8 THE WITNESS: I do recall seeing messages
9 utilizing her pad, her stationery.

10 BY MR. EDWARDS:

11 Q. Okay. Do you remember messages
12 specifically that Ms. Maxwell, she is home, or calls
13 for Ms. Maxwell, or indicating that the person
14 taking the message is GM? Do you remember those?

15 A. Yes.

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

18 BY MR. EDWARDS:

19 Q. And did that give you further reason to
20 want to speak to Ghislane Maxwell?

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

23 THE WITNESS: Correct. I wanted to speak
24 with everyone in the home and everyone
25 associated with Jeffrey Epstein.

1 JOSEPH RECAREY - CONFIDENTIAL

2 anything that's found that has any kind of
3 identifiers, any kind of names, phone numbers,
4 anything that could be used to identify further
5 victims and/or to corroborate what the information
6 we already obtained, that information would be kept.

7 Q. Okay.

8 A. Be followed up on.

9 Q. You testified earlier about certain pieces
10 of paper that had Ghislane Maxwell's name on it that
11 were obtained.

12 Are the documents that are listed, the
13 first one, two, three, four pages of Exhibit 8, some
14 of the documents that you're referring to?

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

17 THE WITNESS: That is correct.

18 BY MR. EDWARDS:

19 Q. And if we go through this stack of
20 documents, if you could just review them and tell me
21 if these are some of the items obtained through the
22 trash pulls at Jeffrey Epstein's home?

23 MR. PAGLIUCA: Object to form and
24 foundation.

25 THE WITNESS: That is correct. This is --

1 JOSEPH RECAREY - CONFIDENTIAL

2 these items were collected in the trash pull.

3 BY MR. EDWARDS:

4 Q. Okay. And these are items that you felt
5 had some evidentiary value?

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

8 THE WITNESS: Yes.

9 BY MR. EDWARDS:

10 Q. Were there other items within the trash
11 that were discarded as not having any apparent
12 evidentiary value?

13 A. Correct. There was stuff like food trash
14 we're not going to keep. You know, an apple core.
15 None of that's going to be kept.

16 Q. Okay. And when you took this stuff into
17 evidence, how was it maintained?

18 A. It was placed in a -- in a sealed
19 container, a sealed Ziploc, and placed into
20 evidence.

21 Q. And then was that file later transferred
22 to the State Attorney's Office or the FBI?

23 MR. PAGLIUCA: Object to form and
24 foundation.

25 THE WITNESS: It was collected by the FBI.

2

3

C E R T I F I C A T E

4

STATE OF FLORIDA)

: ss

5

COUNTY OF MIAMI-DADE)

6

I, KELLI ANN WILLIS, a Registered

7

Professional, Certified Realtime Reporter and

8

Notary Public within and for The State of

9

Florida, do hereby certify:

10

That JOSEPH RECAREY, the witness whose

11

deposition is hereinbefore set forth was duly

12

sworn by me and that such Deposition is a true

13

record of the testimony given by the witness.

14

I further certify that I am not related

15

to any of the parties to this action by blood

16

or marriage, and that I am in no way interested

17

in the outcome of this matter.

18

IN WITNESS WHEREOF, I have hereunto set

19

my hand this 24th day of June, 2016.

20

21

KELLI ANN WILLIS, RPR, CRR

22

23

24

25

EXHIBIT 14

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - X

****CONFIDENTIAL****

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

1 R. Rizzo - Confidential

2 even Nadia. And what I found very repulsive,
3 out of the ordinary, was Nadia was wearing a
4 swimsuit that was very revealing and
5 basically, her bottom basically went up her
6 butt, revealing all of her buttocks. So
7 again, in the context not very appropriate
8 for the situation.

9 Q. Could you tell the relationship of
10 age between the three girls that you have
11 described and Nadia, for instance?

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

14 A. Nadia seemed to be a bit older, I
15 would say.

16 Q. How does this end, or is there,
17 what do you do next? How does this meeting
18 that you've just described break up?

19 A. I asked to excuse myself and asked
20 where the bathroom was, so I'm pointed inside
21 the house, to go inside the house to the
22 bathroom.

23 I walk in there, and I walk, as I'm
24 walking to the bathroom, what caught my eye,
25 and I had to take a double lock, there were

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2 pictures of naked women, half-dressed girls.

3 So I went to the bathroom, again, from
4 someone, myself working in private service, I
5 always know in houses there are cameras, so
6 again, I was very reluctant to stare, because
7 you never know when you are on camera.

8 So I used the bathroom, and I came
9 out, and you know, curiosity got the best of
10 me, and I leaned over and started looking at
11 these pictures for a brief minute, and it was
12 just so coincidental that as I did that, Ms.
13 Maxwell enters, and she immediately says to
14 me that Jeffrey would like for me to rejoin
15 the party immediately.

16 Q. How many pictures of nude females
17 did you see in Jeffrey Epstein's home?

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

20 A. I can't recall the exact number.

21 Q. Can you describe the pictures that
22 you saw in terms of what the people, what the
23 people or person within the picture was
24 wearing, what the age range would be of the
25 person that's in the photograph, any poses,

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2 Q. Did you learn whether your
3 perception was correct?

4 MR. PAGLIUCA: Same objection.

5 A. It was younger. Yes, I did.

6 Q. How old was this girl?

7 A. 15 years old.

8 Q. What happens next when Ghislaine
9 Maxwell and Jeffrey Epstein and a 15-year-old
10 girl walk into Eva Anderson's home?

11 MR. PAGLIUCA: Object to the form.
12 Foundation.

13 A. They proceed into the dining room
14 area, which is across from the living room
15 area. I go into the kitchen and I hear a
16 conversation start. Very muffled, I could
17 not hear any particulars about the
18 conversation whatsoever.

19 My wife and I are in the kitchen
20 preparing the evening meal. Eva brings the
21 young girl into the kitchen. In the kitchen,
22 there is an island with three barstools. Eva
23 instructs the young girl to sit to the
24 furthest barstool on the right.

25 Q. Describe for me what the girl

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2 looked like, including her demeanor and
3 anything else you remember about her when she
4 walks into the kitchen.

5 A. Very attractive, beautiful young
6 girl. Makeup, very put together, casual
7 dress. But she seemed to be upset, maybe
8 distraught, and she was shaking, and as she
9 sat down, she sat down and sat in the stool
10 exactly the way the girls that I mentioned to
11 you sat at Jeffrey's house, with no
12 expression and with their head down. But we
13 could tell that she was very nervous.

14 Q. What do you mean by distraught and
15 shaking, what do you mean by that?

16 A. Shaking, I mean literally
17 quivering.

18 Q. What happens next?

19 A. We were, again, the absurdity,
20 never introduced. Like you would walk into a
21 room and say this is -- so my wife and I are
22 in the kitchen and this young girl is sitting
23 there. It was a very uncomfortable moment.
24 I look at my wife. And so I want to ease the
25 moment, and so I introduced myself and I

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2 introduced my wife, and she doesn't really
3 respond.

4 And I asked her, are you okay? And
5 she doesn't really respond. Nothing verbal,
6 no cues, her head is still down. I ask her
7 if she would like some water, tissue,
8 anything, and she basically doesn't respond.

9 Q. You ask her for a tissue?

10 A. If she would like a tissue or some
11 water at the time.

12 Q. Was she crying at the time?

13 A. My perception, she was on the verge
14 of crying. And I'm trying to loosen the
15 situation every way I know how, so the only
16 way I knew how, and I thought maybe this will
17 comfort her, I said oh, by the way, do you
18 work for Jeffrey.

19 And she says that, I guess kind of
20 made her feel comfortable, because maybe it
21 was that comment or my persistence, and she
22 said yes. So I said, what do you do? And
23 she says I'm Jeffrey's executive assistant,
24 personal assistant. Which, from looking at
25 her, just didn't seem to suit.

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2 And I blurted out: You're his
3 executive personal assistant? What do you
4 do? And she says I was hired as his
5 executive personal assistant. I schedule his
6 appointments.

7 And I'm shocked, and I blurt out:
8 You seem quite young, how did you get a job?
9 How old are you? And she says to me, point
10 blank: I'm 15 years old.

11 And I said to her: You're 15 years
12 old and you have a position like that? At
13 that point she just breaks down hysterically,
14 so I feel like I just said something wrong,
15 and she will not stop crying. My wife and I
16 were at a loss for words, and I keep on
17 trying to console her, and nothing I was
18 saying, are you all right, do you need a
19 tissue, do you need water, consoles her.

20 And then in a state of shock, she
21 just lets it rip, and what she told me was
22 just unbelievable.

23 Q. What did she say?

24 MR. PAGLIUCA: Object to the form
25 and foundation.

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2 A. She proceeds to tell my wife and I
3 that, and this is not -- this is blurting
4 out, not a conversation like I'm having a
5 casual conversation. That quickly, I was on
6 an island, I was on the island and there was
7 Ghislaine, there was Sarah, she said they
8 asked me for sex, I said no.

9 And she is just rambling, and I'm
10 like what, and she said -- I asked her, I
11 said what? And she says yes, I was on the
12 island, I don't know how I got from the
13 island to here. Last afternoon or in the
14 afternoon I was on the island and now I'm
15 here. And I said do you have a -- this is
16 not making any sense to me, and I said this
17 is nuts, do you have a passport, do you have
18 a phone?

19 And she says no, and she says
20 Ghislaine took my passport. And I said what,
21 and she says Sarah took her passport and her
22 phone and gave it to Ghislaine Maxwell, and
23 at that point she said that she was
24 threatened. And I said threatened, she says
25 yes, I was threatened by Ghislaine not to

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2 discuss this.

3 And I'm just shocked. So the
4 conversation, and she is just rambling on and
5 on, again, like I said, how she got here, she
6 doesn't know how she got here. Again, I
7 asked her, did you contact your parents and
8 she says no.

9 At that point, she says I'm not
10 supposed to talk about this. I said, but I
11 said: How did you get here. I don't
12 understand. We were totally lost for words.

13 And she said that before she got
14 there, she was threatened again by Jeffrey
15 and Ghislaine not to talk about what I had
16 mentioned earlier, about -- again, the word
17 she used was sex.

18 Q. And during this time that you're
19 saying she is rambling, is her demeanor
20 continues to be what you described it?

21 A. Yes.

22 Q. Was she in fear?

23 A. Yes.

24 MR. PAGLIUCA: Object to the form
25 and foundation.

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2 Q. You could tell?

3 A. Yes.

4 MR. PAGLIUCA: Same objection.

5 A. She was shaking uncontrollably.

6 Q. What happens with this 15-year-old
7 girl next?

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

10 A. As she is trying to explain, and
11 I'm asking questions because I'm as feared as
12 she is at this point. We hear people
13 approach and she just shuts up.

14 Q. What happens next?

15 A. Eva comes in and tells her that she
16 will be working for Eva in the city.

17 Q. As what?

18 A. As a nanny.

19 Q. Did you see this girl again?

20 A. Yes.

21 Q. And when?

22 A. On a flight maybe a month or so to
23 Sweden.

24 Q. What was the purpose of the flight?

25 A. We were going to Sweden for the

1 R. Rizzo - Confidential

2 summer.

3 Q. Who was on the flight?

4 A. The Dubin family.

5 Q. As well as this girl?

6 A. Yes.

7 Q. What happens?

8 A. One thing that I forgot to mention
9 is during our initial conversation, I asked
10 her what her name was [REDACTED] she said her name
11 was [REDACTED]

12 Q. What happened with [REDACTED]?

13 A. We flew to Sweden, we stopped at an
14 airport that we didn't usually stop at and
15 she got off the plane.

16 Q. Just so that I make sure I
17 understand, who it was that she says asked
18 her for sex on the island, who was that?

19 MR. PAGLIUCA: Object to the form.
20 Foundation.

21 A. She didn't specify who asked for
22 sex. She said that they asked for sex.
23 Immediately after that she put Ghislaine and
24 Sarah into the conversation.

25 Q. Taking her passport?

1 R. Rizzo - Confidential

2 A. Yes.

3 Q. From -- are there any other
4 incidents or occurrences that you observed
5 personally with Jeffrey Epstein and Ghislaine
6 Maxwell?

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

9 A. Not that I can recall.

10 Q. This last event that you described,
11 what's the timeframe when that occurred?

12 A. Late 2004, 2005.

13 Q. When did you resign your employment
14 from the Dubin family?

15 A. I think roughly October.

16 Q. Of what year?

17 A. 2005.

18 Q. Why?

19 A. My wife and I had discussed these
20 incidents, and this last one was just, we
21 couldn't deal with it.

22 Q. When you left your employment with
23 the Dubin family, did you have a job?

24 A. When we finally left, I stayed on
25 three months after my resignation, I had a

CERTIFICATE

I HEREBY CERTIFY that RINALDO
RIZZO, was duly sworn by me and that the
deposition is a true record of the testimony
given by the witness.



Leslie Fagin,

Registered Professional Reporter

Dated: June 10, 2016



(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)

EXHIBIT 15

(Filed Under Seal)

Confidential

Page 1

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 3, 2016
9:07 a.m.

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

Deposition of DAVID RODGERS, 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.

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2 flyer person, then you would reduce it to an
3 initial?

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

6 MR. REINHART: You can answer the
7 question.

8 You can answer the question, if you can
9 answer the question. You are allowed to answer
10 the question, if you understand the question.

11 BY MR. EDWARDS:

12 Q. I'm trying to understand your testimony.

13 Is it, if you came to know that person --

14 A. Uh-huh.

15 Q. -- as a frequent flyer passenger, you
16 would begin to reduce that person's name to an
17 initial at some point?

18 MR. PAGLIUCA: Same objection.

19 THE WITNESS: Well, we don't really have a
20 frequent flyer program that we do, so to speak.
21 A lot of times I would do it because if you
22 would write out everybody's name there is not
23 enough space, you know, to get everybody's name
24 in that little square there.

25

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1 DAVID RODGERS

2 Q. -- is that right?

3 And is that -- is Ghislaine Maxwell
4 somebody that through the years 1995 through 2013
5 was somebody who flew very frequently?

6 A. What were the years again?

7 Q. The years of this book, 1995 --

8 A. I wouldn't say through 2013. But, yes,
9 '95 through 2000 sometime. Probably, I would have
10 to go back and -- well, you can see in there.

11 Q. We will get to it.

12 A. There will be a point where you don't see
13 her much. But to say it went through 2013 would not
14 be accurate.

15 Q. Let's do it this way: The person that you
16 have reflected on numerous notations --

17 A. Yes.

18 Q. -- through here as GM --

19 A. Yes.

20 Q. -- just by the initials, are we able to
21 safely know that that is Ghislaine Maxwell?

22 A. Yes.

23 MR. PAGLIUCA: Object to form and
24 foundation.

25 MR. EDWARDS: Court reporter, did you get

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1 DAVID RODGERS

2 the answer?

3 THE REPORTER: Yes. The answer came
4 before the objection.

5 BY MR. EDWARDS:

6 Q. So on the next flight, the next day, from
7 Palm Beach to SAF. Is SAF Santa Fe?

8 A. Yes.

9 Q. And it indicates JE and GM.
10 Are we able to then know that those
11 passengers on that flight were Jeffrey Epstein and
12 Ghislaine Maxwell?

13 A. Yes.

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

16 BY MR. EDWARDS:

17 Q. And where would you land at SAF? Is that
18 an airport?

19 A. It is an airport.

20 Q. Is it a private airport?

21 A. No. It's -- airlines go in there.

22 Q. Did Jeffrey Epstein also have a landing
23 strip at his property in New Mexico?

24 A. He did at one time.

25 Q. What would that -- do you remember what

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1 DAVID RODGERS

2 that code would be?

3 A. I don't believe there was a code.

4 Q. All right. Were there times that you
5 landed either the Gulfstream or the Boeing --

6 A. No.

7 Q. No.

8 MR. REINHART: Let him finish the question
9 before you answer.

10 THE WITNESS: Oh, I'm sorry.

11 BY MR. EDWARDS:

12 Q. Sure. We are doing fine so far. But the
13 court reporter is taking down all of our questions
14 and all of our answers. We are communicating well.

15 A. Okay.

16 Q. But when I go to read this back, we may
17 not get that.

18 A. Okay. Go ahead.

19 Q. So were there times where you landed one
20 of Jeffrey Epstein's planes on his private landing
21 strip at the New Mexico property?

22 A. Yes. But not the Gulfstream and not the
23 Boeing.

24 Q. What plane did you land on his property?

25 A. The Cessna 421. And probably a

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2 9:00, so it is 20 to 11:00 here.

3 BY MR. EDWARDS:

4 Q. So I want to go to page 41, and down to
5 December 9th. Sorry. December 11.

6 A. Okay.

7 Q. Palm Beach to Teterboro.

8 A. Yeah.

9 Q. And who are the passengers?

10 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, Virginia.

12 Q. And this appears to be the first time that
13 Virginia's name appears in the log?

14 A. Right.

15 Q. Is there a -- is there a reason why the
16 first time -- I notice that the first time on some
17 of the other passengers, you use a first and last
18 name. Is there any reason why you didn't use her
19 first and last name?

20 A. I probably didn't know her last name.

21 Q. Just didn't catch it.

22 A. Yes.

23 Q. Okay. It was not that somebody told you
24 not to use the last name?

25 A. No. No.

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1 DAVID RODGERS

2 Q. So that flight goes from Palm Beach to
3 Teterboro.

4 Can you remember whether that's the first
5 time that you flew on a plane with Virginia Roberts?

6 MR. PAGLIUCA: Object to --

7 THE WITNESS: I believe it is.

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

10 BY MR. EDWARDS:

11 Q. Do you remember the flight?

12 A. No.

13 Q. The next flight three days later goes from
14 Teterboro to Virgin Islands with Jeffrey Epstein,
15 Ghislaine Maxwell, Adam Perry Lang, and Virginia; is
16 that right?

17 A. Yes.

18 Q. And below that, it says, "Reposition."
19 What does that mean?

20 A. We were taking the airplane with no
21 passengers to go into maintenance, or an OPS2
22 inspection.

23 Q. Okay. This is -- this is the same
24 Gulfstream, is that right?

25 A. Yes.

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1 DAVID RODGERS

2 Q. How many passengers would that Gulfstream
3 allow?

4 A. Twelve passengers, I believe.

5 Q. And do you know how Jeffrey Epstein,
6 Ghislaine Maxwell, Adam Perry Lang, and Virginia get
7 off of St. Thomas or leave the island?

8 A. No. I do not. Probably a charter, I'm
9 guessing.

10 Q. If -- who would fly the -- well, is there
11 any other plane that Jeffrey Epstein was able to
12 access back then that was a private plane?

13 MR. PAGLIUCA: Object to foundation.

14 THE WITNESS: No. At that point in time
15 we don't have the Boeing yet.

16 BY MR. EDWARDS:

17 Q. So how many airplanes did Jeffrey Epstein
18 back then?

19 A. Well, we -- I don't know if we had the 421
20 then. We may or may not have. But it wouldn't --
21 you know, you wouldn't be flying the 421 down to
22 St. Thomas with Jeffrey. It is too long of a
23 flight.

24 Q. The Cessna?

25 A. The Cessna 421, correct.

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1 DAVID RODGERS

2 Q. Okay.

3 A. But I'm not even sure we still had it at
4 this point in time.

5 Q. Yeah. It shows up on the next page. We
6 will get there.

7 A. Does it? Okay.

8 So then, yes, the answer is, yeah, we
9 still had the airplane. But we wouldn't have used
10 that.

11 Q. So is there any way of telling how Jeffrey
12 Epstein, Ghislaine Maxwell, Adam Perry Lang, and
13 Virginia were in the Virgin Islands on that, from
14 December 14th, 2000 --

15 MR. PAGLIUCA: Object to foundation.

16 BY MR. EDWARDS:

17 Q. -- based on your knowledge or your logs or
18 anything else?

19 A. No, I wouldn't have any way of knowing.

20 Q. Okay.

21 A. Because the next flight that they are on
22 was like this Palm Beach one, January 16th. So I
23 wouldn't have any idea.

24 Q. Okay. To your knowledge, did Jeffrey
25 Epstein ever fly commercially?

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2 A. He probably has. Back then at this time,
3 I'm going to say probably not. But I know that he
4 has flown commercially. But usually that would be
5 like going to Europe, maybe.

6 Q. Okay. January 16th through the 25th,
7 those flights, do you see that block that I'm
8 talking about?

9 A. Yes.

10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, and then at times Shelly Lewis, do you see
12 that?

13 A. Yes, right.

14 Q. The 25th it lands in Teterboro. And the
15 next day, on the 26th, leaves out of Teterboro with
16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
17 Virginia Roberts. This time you wrote the whole
18 name.

19 A. Right. Right.

20 Q. So when you write the full name, does that
21 signify -- that's when you may have learned her last
22 name?

23 A. Correct.

24 Q. And do you know how she -- how she got up
25 to New Jersey or New York?

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1 DAVID RODGERS

2 A. I do not. I would guess the airlines.

3 Q. At this point in time, did you know what
4 her -- what her relationship was with Jeffrey
5 Epstein or Ghislaine Maxwell?

6 MR. PAGLIUCA: Object to form.

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q. Did you -- was she a masseuse?

10 MR. PAGLIUCA: Object to foundation.

11 THE WITNESS: I -- I'm not sure what she
12 was.

13 BY MR. EDWARDS:

14 Q. Did you form any -- any belief that she
15 was a friend or a business associate or anything?

16 MR. PAGLIUCA: Object to foundation.

17 THE WITNESS: Well, I mean, we had a lot
18 of people on the airplane. And Virginia was
19 just another one of those passengers.

20 BY MR. EDWARDS:

21 Q. Okay. So on the 26th, flies to Palm
22 Beach. And then -- and then I guess the 27th --

23 A. Right.

24 Q. -- leaves from Palm Beach to the Virgin
25 Islands --

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2 A. Yes.

3 Q. -- with Jeffrey Epstein, Ghislaine
4 Maxwell, Emmy Tayler, and Virginia Roberts, right?

5 A. Yes.

6 Q. And on the 30th, you fly it back. That's
7 still the Gulfstream, right?

8 A. Yes.

9 Q. From the Virgin Islands to Palm Beach with
10 the same four passengers, correct?

11 A. Yes.

12 Q. And that's Jeffrey Epstein, Ghislaine
13 Maxwell, Emmy Tayler, and Virginia Roberts?

14 A. Correct.

15 Q. And then what happens to that plane, the
16 Gulfstream, for the next month, from February 1st
17 through March 5th?

18 A. Well, I don't know what happened to it,
19 but I'm -- from, looks like February 17th, I'm going
20 to school to get a type rating on the Boeing. And
21 I'm gone for about three weeks.

22 Q. So this is when you're doing a simulator
23 on the Boeing?

24 A. Correct.

25 Q. And getting your certification to fly the

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1 DAVID RODGERS

2 Boeing?

3 A. Yes.

4 Q. The Boeing, was that previously owned by
5 The Limited or Les Wexner?

6 A. I'm not sure of the company name,
7 officially. But probably, yes.

8 Q. Some association with him?

9 A. Some association, yes.

10 Q. Do you know who flew the Gulfstream while
11 you were doing the simulator?

12 A. Well, it would have been Larry Visoski,
13 I'm not sure who the first officer was.

14 Q. Do you know if any logs were kept of the
15 passengers' names?

16 A. While I was at school?

17 Q. Right, while you were at school.

18 A. There probably were logs, but I don't know
19 where they are.

20 Q. Have you ever spoken with Larry about
21 whether he kept names of passengers?

22 A. I don't think he does.

23 Q. Do you know where Larry Visoski flew the
24 Gulfstream for the month that you were --

25 A. No.

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1 DAVID RODGERS

2 Q. Sorry. Just let me finish my question. I
3 know I was getting it out slow.

4 -- but for the month that you were
5 training on the Boeing?

6 A. No.

7 Q. All right. So the last flight that you
8 took in the Gulfstream before you began, before you
9 flew the Cessna for a day, I guess, right, from
10 Santa Fe to DFW --

11 A. Right.

12 Q. -- February 3rd --

13 A. Yes.

14 Q. And that's the Cessna with 908GM tail
15 number?

16 A. Yes.

17 Q. The last flight that you flew on the
18 Gulfstream was the flight back from St. Thomas with
19 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
20 Virginia Roberts, right?

21 A. Uh-huh.

22 Q. And then the next time that you're on the
23 plane is -- on the Gulfstream is when?

24 A. It looks like March the 5th.

25 Q. And who are the passengers on that flight?

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1 DAVID RODGERS

2 Where is it going to?

3 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
4 Tayler, Virginia Roberts.

5 Q. And then there's notation of Gary
6 Roxborough?

7 A. Yes.

8 Q. Do you know why that is?

9 A. Yeah. He was the first officer.

10 Q. Why did he become the first officer?

11 A. Because Larry was probably in training for
12 the Boeing.

13 Q. Okay. You took -- you alternated?

14 A. Right. We didn't go at the same time.

15 Q. All right. Then the Gulfstream has the
16 same aircraft make and model. That's the same
17 Gulfstream airplane, right?

18 A. Yes.

19 Q. But the aircraft identification mark
20 changes --

21 A. Correct.

22 Q. -- on March 5th, 2001.

23 A. Correct.

24 Q. And it changes to N -- it changes from
25 N908JE to N909JE.

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1 DAVID RODGERS

2 A. Yes.

3 Q. Why was that?

4 A. Because the N908JE went to the Boeing.

5 That was going to be on the Boeing now.

6 Q. And the new number for N909JE was
7 transferred to the Gulfstream?

8 A. Correct.

9 Q. And where does that first flight on the
10 5th go?

11 A. From Palm Beach to Stephenville up in
12 Newfoundland for a fuel stop.

13 Q. Okay. And then how do you know it is a
14 fuel stop?

15 A. Because we are going to Paris, and so we
16 have to stop there for fuel.

17 Q. Okay. I know how -- I know how you would
18 know that. But is there any indication on any of
19 the numbers that go off to the right that would tell
20 me that it's a fuel stop as opposed to --

21 A. No.

22 Q. No? Okay. All right. So there's no way
23 after today's deposition I can look at any of the
24 numbers; it's not going to tell me what it was for?

25 A. No. No. And it's -- obviously it looks

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2 different, because one day is the 5th; one day is
3 the 6th. But we landed there like at 11:50 at
4 night. And then when we took off, it was, you know,
5 the next day.

6 Q. Okay. Got it.

7 And then where do you go the next day?

8 A. We went from Stephenville to
9 Paris-Le Bourget.

10 Q. And who were the passengers going to
11 Paris?

12 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
13 Tayler, and Virginia Roberts.

14 Q. And then what's the next flight?

15 A. On the 8th, from Paris to -- I believe
16 that is in Spain.

17 Q. Granada, Spain?

18 A. Granada, Spain. Correct.

19 Q. Okay. And who are the passengers on that
20 trip?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
22 Tayler, Virginia Roberts, Alberto and Linda Pinto,
23 one female, and Ricardo, it looks like Orieta.

24 Q. And then what's the next flight?

25 A. From there to Tangiers. From Granada to

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2 Tangiers.

3 Q. When you landed -- sorry to go back --
4 when you landed in -- what did we say LEGR was?

5 A. Granada, Spain.

6 Q. Where did -- where did you stay? Where do
7 you stay on those trips?

8 A. We didn't stay. We left the same day, I
9 believe.

10 Q. Okay. What if we go back to one flight to
11 LFPB?

12 A. Uh-huh. LFPB.

13 Q. That's Paris?

14 A. Yeah. We stayed in Paris.

15 Q. And do --

16 A. We stayed there.

17 Q. Do you know -- do you stay at the same
18 location where Jeffrey Epstein, Ghislaine Maxwell,
19 Emmy Tayler, and Virginia Roberts stay?

20 A. No.

21 Q. Where do you stay while you are in Paris?

22 A. Hotel.

23 Q. Where do they say?

24 MR. PAGLIUCA: Object to foundation.

25 THE WITNESS: He has a place there, in

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2 Paris.

3 BY MR. EDWARDS:

4 Q. Okay. Jeffrey Epstein has a home or a
5 house in Paris?

6 A. Right.

7 Q. Okay. Have you been to it?

8 A. Yes, I believe I have.

9 Q. Have you ever stayed there?

10 A. No.

11 Q. And getting to and from the airport, were
12 you ever in the car riding to or from the airport in
13 Paris with Jeffrey Epstein?

14 A. No.

15 Q. So going down to the 9th, then, where is
16 that flight?

17 A. That is from Tangiers to London Luton
18 Airport.

19 Q. And is Luton Airport, is that a major
20 airport?

21 A. For general aviation it is. There is
22 airline service in there, but it is not a huge one,
23 for sure.

24 Q. Who were the passengers?

25 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy

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2 Tayler, and Virginia Roberts.

3 Q. And am I reading this correctly that the
4 next flight is two days later, on the 11th?

5 A. Yes.

6 Q. And where does the flight on the 11th go?

7 A. From Luton to Bangor, Maine.

8 Q. All right. While in London, do you know
9 what Jeffrey Epstein, Ghislaine Maxwell, Emmy
10 Tayler, and Virginia Roberts did?

11 A. No, I do not.

12 Q. Do you know who they saw?

13 A. No, I do not.

14 Q. After the flight to Maine, where is the
15 next flight?

16 A. Maine is from Bangor to Teterboro the same
17 day.

18 Q. Okay.

19 A. So that was a fuel stop.

20 MR. EDWARDS: All right. We are at a good
21 time to stop. The videographer has to change
22 tapes.

23 THE WITNESS: Okay.

24 MR. EDWARDS: So we why don't we take a
25 five-minute break.

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2 THE WITNESS: Okay.

3 THE VIDEOGRAPHER: Off the record at
4 10:57.

5 (Thereupon, a recess was taken, after
6 which the following proceedings were held:)

7 THE VIDEOGRAPHER: This is the beginning
8 of Disk 2. On the record at 11:12.

9 BY MR. EDWARDS:

10 Q. Sure. If we go back to page 41,
11 December 7th, 2000.

12 MR. PAGLIUCA: Give us a Bates page,
13 please.

14 MR. EDWARDS: Right, 41. For the
15 remainder, when I say "page," I'm really just
16 referring to the Bates number.

17 BY MR. EDWARDS:

18 Q. So page 41, December 7th, 2000.

19 A. Okay.

20 Q. Do you see that?

21 Where was that flight going from and to?

22 A. Luton to -- Luton -- that's going into
23 Marham Air Force Base.

24 Q. Do you remember why you would have flown
25 into the Air Force base?

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2 A. We flew in there to drop the passengers
3 off. And then these passengers that were on there,
4 we dropped them off. And then -- let's see. We
5 repositioned.

6 I don't remember. We dropped passengers
7 off, and we had to leave, I believe.

8 Q. Okay. That was --

9 A. We weren't allowed to stay there.

10 Q. That was Tom Pritzker?

11 A. Yes.

12 Q. And then did you also drop off Jeffrey
13 Epstein, Ghislaine Maxwell, Kelly Spamm?

14 A. Yes.

15 Q. Okay.

16 A. I believe everyone got off the airplane
17 there.

18 Q. And where did you reposition to?

19 A. It says, "Positioned in Norwich, England."
20 I guess it's Norwich.

21 Q. Sandringham, that is what it says right
22 above that. What is that?

23 A. Sandringham. I believe Sandringham is the
24 estate that the queen has --

25 Q. Okay.

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2 A. -- near there.

3 Q. All right. And the flight on
4 December 9th --

5 A. Uh-huh.

6 Q. That's Jeffrey Epstein, Ghislaine Maxwell,
7 Emmy Tayler, Kelly Spamm?

8 A. Right.

9 Q. And then what did you write in the
10 parenthesis under that?

11 A. "Blowing snow on runway." It was a great
12 weird phenomenon that happened that night.

13 Q. And then you're leaving out of that
14 Sandringham Airport; is that right?

15 A. We are -- which one are you on?

16 Q. On the 9th.

17 A. On the 9th --

18 Q. The first entry on the 9th.

19 A. The 9th, we're leaving, looks like
20 Norwich, England, I believe, EGSH, and we go to
21 Gander, Newfoundland --

22 Q. Okay?

23 A. -- for a fuel stop.

24 Q. I think before we took a break that we
25 were on page 43.

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2 A. Uh-huh.

3 Q. And the flight that began in Palm Beach,
4 before going to Paris and Belgium, Tangier, I think
5 you told me, it ended up in Maine --

6 A. Correct.

7 Q. -- on March 11th, 2001.

8 A. Right.

9 Q. Or, sorry, it ended up in Teterboro.

10 A. Teterboro.

11 Q. Okay. And then on the 15th, you fly
12 from -- on the Gulfstream out of Teterboro to ISP.
13 Do you know where that is?

14 A. Islip, New York.

15 Q. Okay. And Virginia Roberts was on the
16 flight that landed in Teterboro on the 11th,
17 correct?

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

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. But leaving out of Teterboro, she's not
23 one of the passengers on the flight.

24 A. No.

25 Q. Any idea where she went?

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2 A. No.

3 Q. Okay.

4 MR. PAGLIUCA: Are you referring to
5 Bates 0041, the 11th through 14th? Is that
6 what you're talking about?

7 MR. EDWARDS: Forty-three.

8 MR. PAGLIUCA: Forty-three.

9 MR. EDWARDS: March 11th and March 15th,
10 2001.

11 MR. REINHART: If it will help there, the
12 flight numbers column, like the fifth or sixth
13 column over, are sequentially numbered and
14 unique numbers. So if you want to just say
15 "flight 1468" --

16 MR. EDWARDS: Okay.

17 MR. REINHART: -- that might help
18 everybody --

19 MR. EDWARDS: Right.

20 MR. REINHART: -- follow along.

21 MR. EDWARDS: Okay. Thanks, Bruce.

22 MR. REINHART: Uh-huh.

23 BY MR. EDWARDS:

24 Q. So the flight now that I'm talking about
25 that leaves out of Teterboro on the 15th, flight

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2 No. 1471 --

3 A. Right.

4 Q. -- the passengers appear to be Jeffrey
5 Epstein, Ghislaine Maxwell, Adam Perry Lang, Alexia
6 Wallert and Banu Cukuglu?

7 A. I think so.

8 Q. Do you remember Banu?

9 A. I definitely remember that. It was a hard
10 name to spell.

11 Yeah. Sort of, I guess. I mean, if she
12 walked in right now, I probably wouldn't recognize
13 her.

14 Q. Well, it has been since 2001, so --

15 A. Yeah, I know.

16 Q. Okay. So then the next flight is 1472.
17 Where is that? Where is that going?

18 A. From Islip to Lake City, Florida.

19 Q. All right. And the passengers, again, are
20 who?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
22 Perry Lang, Alexia Wallert and Banu Cukuglu,
23 whatever her name is.

24 Q. Did you know what relationship she had, if
25 at all, with Jeffrey Epstein?

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2 A. No. No.

3 Q. Do you remember an Ed Tuttle?

4 A. Yes.

5 Q. And who was he?

6 A. I believe Ed was a, probably in
7 construction. I think he may have been around
8 before the Jeffrey -- well, let me think.

9 Q. If we skip down to March 16th, I see his
10 name. So I don't know if that's going to help you.

11 A. I believe -- I believe Ed Tuttle was like
12 maybe an architect, or somewhere in the
13 construction, real estate side, I believe.

14 Q. Okay. So flight No. 1477 --

15 A. Uh-huh.

16 Q. -- from LaGuardia to Palm Beach, is that
17 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Joe
18 Pagano, Eva Dubin?

19 A. Yes.

20 Q. Celina Dubin?

21 A. Yes.

22 Q. Jordan Dubin?

23 A. Right.

24 Q. Maya Dubin and two nannies?

25 A. Yes.

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2 Q. And Alexia Wallert? Is that what that is?

3 A. I would assume so, yes, AW.

4 Q. That is sort of what we talked about in
5 the beginning, where Alexia Wallert appears in full
6 name at the top --

7 A. Right.

8 Q. -- and it's AW, AW, AW.

9 A. And there's no room to write her name out
10 there --

11 Q. Right.

12 A. -- so she's AW.

13 Q. Okay. And then the next flight, the 27th,
14 leaves out of Palm Beach. Who are our passengers on
15 that flight and where's it going? 1478 is the
16 flight.

17 A. Yeah. Jeffrey Epstein, Ghislaine Maxwell,
18 Emmy Tayler, Virginia Roberts, two females, Banu,
19 and that's it.

20 Q. And do you know, in New York, when that
21 plane lands in Teterboro, where do you stay when the
22 plane is up there?

23 A. It is 2001. At an apartment there.

24 Q. Did you have your own apartment?

25 A. Yes.

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2 Q. Or did you stay at one of Jeffrey
3 Epstein's apartments?

4 A. No. It was his apartment, Jeffrey's
5 apartment.

6 Q. Was that one of the apartments at 301 East
7 66th Street?

8 A. Yes.

9 Q. And did any of the other passengers from
10 that flight, that 1478, did any of them stay at any
11 of those apartments?

12 A. Yeah. Emmy would have. Virginia probably
13 did.

14 Q. Did you see Virginia stay at the
15 apartment?

16 A. I don't know.

17 Q. When you were in New York and you left
18 from the airport, did you ride in the same car with
19 Virginia?

20 A. Not usually. I mean, I don't know if we
21 ever did. It's possible we did.

22 Q. Do you know whether Virginia Roberts
23 stayed at Jeffrey Epstein's townhouse or whether
24 Virginia Roberts stayed at the apartments?

25 MR. PAGLIUCA: Object to form.

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2 THE WITNESS: I don't know for sure.

3

4 BY MR. EDWARDS

5 Q. Can you recollect riding in a car with
6 her, or can you recollect whether she got in a car
7 with anyone else?

8 MR. PAGLIUCA: Object to form.

9 THE WITNESS: I can't.

10 MR. EDWARDS: Okay.

11 MR. REINHART: I'm sorry. Are you asking
12 about that specific trip or --

13 MR. EDWARDS: Sorry.

14 BY MR. EDWARDS:

15 Q. I mean that specific trip.

16 A. No. I can't.

17 Q. How about in general at any time?

18 A. No. I don't recall. I mean, I can
19 recall, I would ride sometimes with Emmy, with Adam
20 I remember them being in the car. But, again, that
21 was unusual. Usually it would just be Larry and
22 myself. But on occasion, you know, somebody might
23 ride with us.

24 Q. When you would stay at the apartment in
25 New York on East 66th Street, would it always be in

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2 the same apartment?

3 A. Yes.

4 Q. All right. There are multiple apartments
5 owned by Jeffrey Epstein?

6 A. At that time, it was the same apartment.

7 Q. Okay. Have you stayed in other apartments
8 since that time?

9 A. Yes.

10 Q. All at that East 66th Street location?

11 A. Yes. I really don't -- I don't have an
12 apartment there now. We haven't gone there since
13 probably 2008.

14 Q. How about Banu? Would she have stayed at
15 301 East 66th Street?

16 MR. PAGLIUCA: Object to foundation.

17 THE WITNESS: Most likely.

18 BY MR. EDWARDS

19 Q. Why do you say that?

20 A. Well, if she's on the plane with us on
21 multiple trips, then most likely she probably stayed
22 there.

23 Q. Have you been to Jeffrey Epstein's
24 townhouse as 9 East 71st Street?

25 A. Yes.

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2 Q. And it's a pretty big place, right?

3 A. Pretty big.

4 Q. And it has numerous bedrooms?

5 A. Yes.

6 Q. Any reason why Banu would not have been
7 staying there?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: I don't know.

10 BY MR. EDWARDS

11 Q. I'm just trying to get to, is there a
12 reason why you believe that Banu would have, I think
13 you said, probably have stayed at the apartment
14 versus the townhouse?

15 A. Well, I only say that because Emmy, you
16 know, stayed there.

17 Q. Stayed where?

18 A. At the -- at our apartments.

19 Q. Okay.

20 A. I'm pretty sure Adam, yeah, Adam stayed
21 there at the time. So most of the people that were
22 regulars on the flight, they would stay there in the
23 apartments.

24 Q. Okay. But do you remember Virginia or
25 Banu staying in the apartments?

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2 A. I do not specifically.

3 Q. Okay. The next flight on the next day,
4 1479, is flying from Teterboro to Santa Fe; is that
5 right?

6 A. Yes.

7 Q. And who are those passengers?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
9 Perry Lang, Virginia Roberts, Banu, Marvin Minsky,
10 Henry Jarecki.

11 Q. Do you remember Marvin and Henry?

12 A. I remember Henry. I don't really remember
13 Marvin.

14 Q. Okay. And then two days later -- again,
15 where would you have stayed if you landed in
16 Santa Fe on March 29th, 2001?

17 A. Probably would have stayed at the ranch.

18 Q. At the Zorro Ranch?

19 A. Yes.

20 Q. All right. Did the other passengers that
21 were on the plane, Jeffrey Epstein, Ghislaine
22 Maxwell, Adam Perry Lang, Virginia Roberts, Banu --
23 I'm not evening going to try her last name --

24 A. Right.

25 Q. -- Marvin Minsky and Henry Jarecki also

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2 have stayed at the ranch?

3 MR. PAGLIUCA: Object to foundation.

4 THE WITNESS: I'm going to say most likely

5 they did.

6 BY MR. EDWARDS

7 Q. Was there any other location in Santa Fe
8 where you are aware passengers would have stayed?

9 A. Not that I'm aware of.

10 Q. If you were all going to the same place,
11 is that an occasion where you would all ride in the
12 same vehicle from the airport to the ranch?

13 MR. PAGLIUCA: Object to foundation.

14 THE WITNESS: I don't know.

15 BY MR. EDWARDS

16 Q. You would still right in separate
17 vehicles?

18 A. Right. Because it takes us about an hour
19 to finish up at the airport.

20 Q. And then the 31st, so two days?

21 A. Let me go back to that one --

22 Q. Sure.

23 A. -- and say, it is possible. I think Adam
24 has ridden with us before. So I couldn't swear that
25 one way or the other. But he has probably ridden

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2 with us before to the airport; to or from the
3 airport.

4 Q. Two days later, flight No. 1408 out of
5 Santa Fe to Palm Beach, who were the passengers
6 there?

7 A. Jeffrey Epstein, Ghislaine Maxwell, Prince
8 Andrew, Virginia Roberts, Nadia Bjorlin, Henry
9 Jarecki, Marvin Minsky.

10 Q. Do you remember when you were at the ranch
11 Nadia Bjorlin arriving?

12 A. I would assume that she airlined in there.

13 Q. Do you remember her at the ranch? Did she
14 perform for you or anything?

15 A. No.

16 I don't remember her at the ranch. I
17 mean, I'm sure she was there. I just don't
18 remember.

19 Q. Okay. Do you remember a person named
20 Heather Mann? She's found on flight 1438 next to
21 Lydia.

22 A. Heather Mann, not really.

23 Q. Okay. The next flight, on page 45, is
24 1488. The flight number. April 9th, 2001.

25 A. Right.

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2 Q. Where does that flight take off from and
3 where does it go?

4 A. Palm Beach to Atlantic City.

5 Q. Who is on that flight?

6 A. Jeffrey Epstein, Emmy Tayler, Virginia
7 Roberts, Banu and Johanna.

8 Q. Do you remember Johanna Sjoberg?

9 A. I don't.

10 Q. On that same day, you take a flight to
11 Teterboro?

12 A. Right.

13 Q. Did you go to the casinos at all that day?

14 A. I don't think so.

15 Q. Would that be something that you would do
16 with them? Or you would stay back?

17 A. No. We would stay at the airport.

18 Q. All right.

19 And then two days later, on the 11th,
20 flight 1490, the plane flies out of Teterboro.

21 For that two-day period of time, the night
22 of the 9th and the night of the 10th, would you have
23 stayed at the apartment?

24 MR. PAGLIUCA: Object to foundation.

25 MR. EDWARDS: In New York.

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2 THE WITNESS: I would say, yes.

3 BY MR. EDWARDS:

4 Q. All right. Do you know where Virginia and
5 Banu and Johanna stayed?

6 A. No idea.

7 Q. You can't recollect whether they were --
8 you can't recollect seeing them at the apartments?

9 MR. PAGLIUCA: Object to foundation.

10 THE WITNESS: No.

11 BY MR. EDWARDS:

12 Q. All right.

13 Then on the 11th, you leave from Teterboro
14 and go to where?

15 A. St. Thomas.

16 Q. That is flight 1490. And on that flight,
17 Jeffrey Epstein, Ghislaine Maxwell, Prince Andrew,
18 Banu, Virginia Roberts and Johanna?

19 A. Yes.

20 Q. And that is -- that is a flight -- how
21 does -- how did those passengers get from -- does
22 Jeffrey Epstein have a place in St. Thomas?

23 MR. PAGLIUCA: Object to form.

24 THE WITNESS: Well, yes.

25

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2 BY MR. EDWARDS:

3 Q. Where is that?

4 A. In St. Thomas, he has an office. In St.
5 Thomas.

6 Q. Where does he stay in the Virgin Islands?

7 A. On Little St. James.

8 Q. And how do the passengers get from
9 St. Thomas to Little St. James?

10 A. Most likely, helicopter.

11 Q. How many people does the helicopter fit?

12 A. We didn't own a helicopter then.

13 Probably -- probably 5. It depends,
14 because they had different helicopters. I'm not
15 sure which one they used that day.

16 Q. What is the duration of the flight from
17 St. Thomas to Little St. James?

18 A. About six minutes.

19 Q. What is the duration of a boat trip from
20 Little St. James to St. Thomas?

21 A. Probably about, let's say, 15 to 20
22 minutes. But you are on the east side of the island
23 and the airport is almost to the west side of the
24 island.

25 Q. So you have to almost circle the island?

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2 A. To get from the island by boat, to get
3 to -- there's land there and take a car, it is
4 probably -- it is probably close to an hour, 45
5 minutes for sure.

6 Q. Are there passenger manifests that are
7 kept for the helicopters?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: I'm not sure. I'm not sure.

10 BY MR. EDWARDS:

11 Q. Back in this time, in around April of
12 2001, did Jeffrey Epstein have a helicopter yet?

13 A. No, he did not have a helicopter.

14 Q. At that time?

15 A. Correct.

16 Q. And so do you remember the name of the
17 company or corporation that they rented or
18 transported?

19 A. I don't. It was the only -- helicopter
20 service there in St. Thomas is no longer there.

21 Q. Okay.

22 A. Air Center Helicopter.

23 Q. Was there a particular person at Air
24 Center Helicopter that you ever coordinated with?

25 A. We would, like, call a dispatcher. Or you

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2 know, whoever picked up the phone, we would call
3 them.

4 Q. All right. So 1491 is a flight from
5 St. Thomas to Palm Beach; is that right?

6 A. Yes.

7 Q. And Gwendolyn Beck is now on that flight?

8 A. Yes.

9 Q. Do you remember that flight at all, 1491?

10 A. Not really.

11 Q. Anything about it stick out in your mind?

12 A. No.

13 Q. All right. The next flight that -- do you
14 remember a female name Kelly Bovina?

15 A. I remember the name, but I don't remember
16 her.

17 Q. Was she an actress as well, do you
18 remember that?

19 A. I don't recall.

20 Q. The next flight I want to direct your
21 attention is 1501, May 3rd, 2001.

22 A. Okay.

23 Q. What is that airport, ADS?

24 A. Addison, Texas. San Antonio, Texas.

25 Q. And who are the passengers on that?

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2 A. Jeffrey Epstein, Virginia Roberts.

3 Q. Do you know how Virginia Roberts got to
4 Addison, Texas?

5 A. No.

6 Q. Was that flight -- was the purpose of that
7 flight only to pick up Virginia Roberts?

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

10 BY MR. EDWARDS:

11 Q. Can you tell by your logs?

12 A. Not really. Let's see. We -- no, I don't
13 know.

14 Q. The flight previous on the 3rd flies in
15 from where? Where is that?

16 A. Little Rock.

17 Q. Arkansas?

18 A. Correct.

19 Q. So the only passenger on that flight from
20 Little Rock, Arkansas, to Addison, Texas, flight
21 1500, is Jeffrey Epstein, right?

22 A. Right.

23 Q. And then you land in Addison before going
24 to Santa Fe?

25 A. That is actually San Antonio, I believe.

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2 Yes. That is San Antonio, SAT.

3 Q. How long is the flight from Addison to San
4 Antonio?

5 A. I would be guessing, probably an hour.

6 Q. Do you know what the purpose was for
7 landing --

8 A. Well, you know, I can tell you. It is
9 9/10s. Fifty-four minutes.

10 Q. Do you know what the purpose was to be to
11 land in Addison, Texas, before arriving in San
12 Antonio?

13 A. I do not. But it appears that we spent
14 the night in San -- oh, I see what you are saying.
15 No, I don't know. That I went to Addison probably
16 the same day.

17 Q. Went to Addison and picked up Virginia
18 Roberts?

19 A. It looks like it.

20 Q. And then in San Antonio, two days later,
21 who are your passengers on that flight, 1502?

22 A. Jeffrey Epstein, Virginia Roberts.

23 Q. Where do you fly?

24 A. From San Antonio to Palm Beach.

25 Q. And in May, on May 14th, 2001, flight

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2 1506, where is that flight leaving from?

3 A. St. Thomas.

4 Q. And going where?

5 A. Teterboro.

6 Q. And who are your passengers?

7 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
8 Tayler, Banu, Virginia Roberts and one female.

9 Q. And, again, do you remember who the one
10 female would have been with Virginia Roberts?

11 A. No.

12 Q. Can you tell by this how any of those
13 individuals that were on that flight leaving from
14 the Virgin Islands to Teterboro got to the Virgin
15 Islands?

16 A. No.

17 Q. What were the other possible avenues back
18 in those days for Jeffrey Epstein, Ghislaine Maxwell
19 to travel to the Virgin Islands?

20 A. They could have done a charter, possibly.

21 Q. Okay. Was there ever a time when, it
22 looks like that is the -- that is the Gulfstream
23 that you fly out of the Virgin Islands to Teterboro,
24 correct?

25 A. Correct.

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2 Q. Was there ever a time you were flying the
3 Gulfstream and -- well, let's go back a little bit.

4 A. Okay.

5 Q. On May 7th, at the top.

6 A. Right.

7 Q. Flight 1503, that is the Gulfstream
8 traveling from Palm Beach to CHO?

9 A. That is Charlottesville, I believe,
10 Virginia.

11 Q. And then on that same day from
12 Charlottesville to Teterboro?

13 A. Correct.

14 Q. So when does the Gulfstream get from
15 Teterboro to St. Thomas?

16 A. Hmm, I don't know. Because it appears
17 that I'm on vacation at that time. So I don't know.

18 Q. How did you get to St. Thomas for the 14th
19 to fly?

20 A. Airline.

21 Q. All right. So at some point in time,
22 between May 7th and May 14th --

23 A. Uh-huh.

24 Q. -- somebody flies the Gulfstream to the
25 Virgin Islands.

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2 A. Correct.

3 Q. And who would that be?

4 MR. PAGLIUCA: Object to foundation.

5 THE WITNESS: Larry Visoski and I don't
6 know who the other person would have been.

7 BY MR. EDWARDS:

8 Q. When you pick up passengers in the Virgin
9 Islands and you are taking them to Teterboro, do you
10 speak with Larry Visoski about when he arrived in
11 the Virgin Islands?

12 A. Yeah. Yeah. We would coordinate that. I
13 mean, usually we would go down there together. We
14 would ride in the same airline down.

15 Q. In this particular case, you were on
16 vacation?

17 A. Well, that is true. However, most likely
18 he airlined home once he got to St. Thomas. And
19 then most likely, we drove in a car to Miami and
20 road the same airline down there.

21 Q. That was something that you customarily
22 did?

23 A. Yes.

24 Q. Okay. So then you have -- we have no way
25 of knowing then who the passengers that flew to the

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2 Virgin Islands would have been, if there were any in
3 addition to those that left?

4 A. No.

5 Q. All right. You fly into Teterboro on
6 flight 1506 on May 14th, 2001, and fly out in the
7 Gulfstream on the 24th, 10 days later; is that
8 right?

9 A. Yes.

10 Q. And your passengers, 10 days later flying
11 to Palm Beach are Jeffrey Epstein, Ghislaine
12 Maxwell, Emmy Tayler, Adam Perry Lang and a female.

13 A. Right.

14 Q. Do you know where Virginia Roberts went
15 during that time after she landed in Teterboro on
16 the 14th?

17 A. I do not.

18 Q. Page 47, I'm going to go to flight
19 No. 1510. June 3rd, 2001.

20 Who is on that flight?

21 A. Jeffrey Epstein, Virginia Roberts, Banu.

22 Q. And you are flying from Palm Beach to
23 St. Thomas again?

24 A. St. Thomas, yes.

25 Q. And then from St. Thomas to Teterboro two

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2 days later, on June 5th?

3 A. Jeffrey Epstein, Virginia Roberts, and
4 Banu.

5 Q. All right. And then where is the next
6 flight on the 8th?

7 A. On the 8th, from Teterboro to Montreal.

8 Q. Do you know what -- so Virginia Roberts
9 and Banu were not on the flight on the 8th, right?

10 A. That's correct.

11 Q. Okay. Do you remember the flight on the
12 8th with Naomi Campbell, Rebecca White, Ana Malova?

13 A. Sort of. But not really.

14 Q. Okay. Do you remember who Rebecca White
15 is?

16 A. No.

17 Q. Do you remember how old Rebecca White was?

18 A. No.

19 Q. The next flight I want to direct your
20 attention to is on the 15th of June, flight 1516.

21 A. Uh-huh.

22 Q. Passengers: Jeffrey Epstein, Ghislaine
23 Maxwell, and then does that say Sheridan?

24 A. Yes.

25 Q. Do you remember a passenger named Sheridan

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2 Gibson?

3 A. Possibly.

4 Q. And then it says, Caroline. Do you know
5 who Caroline is?

6 A. I do not.

7 Q. And then one female?

8 A. Yeah, I don't know who the female is.

9 Q. Okay. On the 28th, there is a flight
10 1523.

11 A. Uh-huh.

12 Q. From -- is that Portugal to St. Thomas?

13 A. No. It is the Azores.

14 Q. LPAZ?

15 A. Yes. It was a fuel stop.

16 Q. To St. Thomas?

17 A. Right.

18 Q. And then on that flight is Jeffrey
19 Epstein, Ghislaine Maxwell, Emmy Tayler and Ed
20 Tuttle, right?

21 A. Yes.

22 Q. Six days later, leaving on July 4th from
23 St. Thomas, who are your passengers?

24 A. Jeffrey Epstein, Prince Andrew, Virginia
25 Roberts, one female.

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2 Q. And do you know how Virginia Roberts got
3 to the Virgin Islands?

4 A. No.

5 Q. Is there any -- is it possible that the
6 Cessna took her or the Boeing took her? Or any
7 other aircraft that is owned by Jeffrey?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: No, I would -- if I had to
10 guess, I would guess the airlines.

11 BY MR. EDWARDS:

12 Q. Okay.

13 A. Well, I know it wasn't the Boeing, because
14 the Boeing is not in operation at that point in
15 time. We hadn't flown it. I mean, it hadn't had
16 any passengers on board yet. That is like in August
17 of 2001.

18 Q. Okay. And the Cessna, did you take that
19 from Florida to the Virgin Islands?

20 A. It has been to the Virgin Islands, but I
21 don't think we ever took any passengers down there.

22 Q. Okay. All right. The next flight is
23 1525.

24 A. Okay.

25 Q. On July 8th, 2001.

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2 A. Okay.

3 Q. That leaves out of Palm Beach?

4 A. Okay.

5 Q. Where do you go on that?

6 A. Teterboro.

7 Q. And who are your passengers?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
9 Tayler, Prince Andrew, Virginia Roberts, Sheridan
10 Gibson, maybe Sheridan Gibson-Beaute, I guess, and
11 one female.

12 Q. And then three days later, you leave out
13 of Teterboro to CPS?

14 A. Yes.

15 Q. Where is that?

16 A. That is St. Louis, actually it is Cahokia,
17 Illinois, across the river from St. Louis.

18 Q. Who are your passengers?

19 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
20 Tayler, Virginia Roberts. We were actually en route
21 to Santa Fe. We had a mechanical problem. We had
22 to go into there for maintenance.

23 Q. Do you remember having a mechanical
24 problem or is the log just refreshing your memory?

25 A. No, I remember because that was the only

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2 time we landed at Cahokia with passengers on board.

3 Q. What was the problem?

4 A. We had a -- we had a static line that had
5 cracked and it was causing our altimeters to not
6 agree. And then we went to the alternate system,
7 things got really worse because it was stopped up
8 with a mud dauber somewhere in the system. That is
9 why I remember that flight.

10 Q. When you landed in St. Louis did the
11 passengers get off the plane?

12 A. Yes. And then they airlined -- I believe
13 they airlined. They could have taken a charter, I
14 don't recall. But I know they didn't leave with us.

15 Q. All right. And the passengers that got
16 off the plane would have been Jeffrey Epstein,
17 Ghislain Maxwell, Emmy Tayler and Virginia Roberts?

18 A. Yes.

19 Q. And then on the 16th, those five days
20 later, those same passengers leave Santa Fe?

21 A. Right.

22 Q. And go back to Teterboro?

23 A. Correct.

24 Q. When Jeffrey Epstein would go to his
25 townhouse in New York, would you always fly into

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2 Teterboro?

3 A. Most of the time. It would depend on the
4 airplane, too. Like the Boeing, you are not allowed
5 to take it into Teterboro.

6 Q. So while you had the Gulfstream, it seemed
7 like Teterboro?

8 A. Yeah, it is -- I mean, occasionally there
9 would be a LaGuardia in there, but not really often.

10 Q. So on the 16th, you fly in to Teterboro.
11 And then six days later, it looks like, flight
12 No. 15 -- oh, wait. All right.

13 So flight No. 1528, you fly into
14 Teterboro, Jeffrey Epstein, Emmy Tayler, Ghislaine
15 Maxwell and Virginia Roberts. Do you see that?

16 A. Yes.

17 Q. Then the next flight I have listed is
18 1530.

19 Do you know where 1529 is?

20 A. No, other than I'm gone for some reason.
21 I wasn't on that flight.

22 Let's see. July, approximately. I see I
23 went on vacation.

24 Q. Okay. And the 23rd, there is a flight
25 from Palm Beach to St. Thomas with Jeffrey Epstein,

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2 Shelly Lewis. Do you see that?

3 A. Yes.

4 Q. Five days later, the flight that leaves
5 St. Thomas does not have Shelly Lewis; is that
6 right?

7 A. Correct.

8 Q. And then you fly to Palm Beach?

9 A. Yes.

10 Q. And who are your passengers at that time?

11 A. Jeffrey Epstein, Virginia Roberts, yes.

12 Q. When you had the mechanical problem, do
13 you remember any of the passengers being scared or
14 frightened?

15 A. No. Not really. I mean, they didn't
16 really know that we had a problem. We just informed
17 them that we couldn't continue on to Santa Fe.

18 Q. Okay. And August 7th, 2001, flight 2?

19 A. Uh-huh.

20 Q. Is that the first flight that the Boeing
21 makes with passengers?

22 A. Correct.

23 Q. And that is Jeffrey Epstein, Ghislaine
24 Maxwell, Emmy Tayler, Prince Andrew and two females.
25 Do you remember who the two females were on the

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2 first passenger flight of the Boeing?

3 A. I do not.

4 Q. And then on the 7th -- at that flight flew
5 from Los Angeles to Albuquerque, correct?

6 A. Uh-huh.

7 Q. On the 14th, you were flying the Cessna
8 that has the 908GM tag.

9 A. Correct. Right.

10 Q. And then the next entry with passengers is
11 on the 16th. And you are flying the Boeing again,
12 right?

13 A. Yes.

14 Q. All right. Do you know who flew the
15 Boeing for flight 3, 4 and 5?

16 A. For 3, 4 and 5, no. Oh, yes. I know it
17 wasn't me. I do remember that now.

18 I went on vacation. And it was a contract
19 guy that flew for us while I was gone.

20 Q. Do you remember a passenger named
21 Alexander Dixon?

22 A. Alexander Dixon, no.

23 Q. Flight No. 11 on the Boeing?

24 A. Uh-huh.

25 Q. Now, the Boeing has the tag 908JE?

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2 A. Correct.

3 Q. That is what you were explaining in the
4 beginning, correct?

5 A. Correct.

6 Q. So September 3rd, the Boeing flies from
7 St. Thomas to HPN?

8 A. Yes, White Plains, New York.

9 Q. And your passengers?

10 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, Adam Perry Lane, Banu, Sarah Kellen,
12 Alexander Dixon.

13 Q. Do you remember Sarah Kellen?

14 A. Yes.

15 Q. And do you remember what -- is that your
16 first time meeting Sarah Kellen, when she appears?

17 A. I don't think so. I thought she was on an
18 earlier flight. Let's see. But it could be. It
19 could be, I'm not sure.

20 Q. Do you know how Sarah Kellen got to
21 St. Thomas to be leaving St. Thomas with you?

22 A. No.

23 Q. Do you know what her relationship was, if
24 any, with Jeffrey Epstein?

25 A. She was -- Sarah was sort of taking over

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2 Emmy's position. Like an assistant to Ghislaine.

3 Q. All right. Page 53. January 15th, 2002.

4 A. Okay.

5 Q. There is a flight from Bedford,
6 Massachusetts; is that right?

7 A. Yes.

8 Q. To where is that going?

9 A. White Plains.

10 Q. And it's Jeffrey Epstein and Jessica.

11 A. Yes.

12 Q. Do you remember who Jessica is?

13 A. I do not.

14 Q. From White Plains, who are the passengers
15 going to St. Thomas?

16 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
17 Kellen, Prince Andrew, Cindy Lopez, Johanna and one
18 female.

19 Q. Do you remember Cindy Lopez?

20 A. Yes.

21 Q. And what did she do?

22 A. I don't know what she did, but I do
23 remember Cindy Lopez.

24 Q. Was she somebody that you believed to be a
25 masseuse?

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2 A. I'm not sure what her position was. It is
3 possible.

4 Q. All right. February 9th, 2002, flight 57
5 on the Boeing.

6 A. Okay.

7 Q. From Miami to White Plains.

8 A. Yes.

9 Q. Your passengers include Bill Clinton, four
10 Secret Service.

11 Did the Secret Service ask that you not
12 identify them by name?

13 A. No.

14 Q. Any reason that you didn't identify them
15 by name?

16 A. Didn't know their name.

17 Q. Two males, one female.

18 A. Right.

19 Q. Jeffrey Epstein, Ghislaine Maxwell, Sarah
20 Kellen and Prince Andrew.

21 A. Correct.

22 Q. Was that your first time meeting Bill
23 Clinton?

24 A. Yes.

25 Q. At that point, did you have any

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2 understanding of what was the relationship between
3 Jeffrey Epstein and Bill Clinton or Ghislaine
4 Maxwell and Bill Clinton?

5 A. No, I didn't have any idea.

6 Q. Had you seen any pictures, prior to that
7 time, of Bill Clinton in any of Jeffrey Epstein's
8 planes or homes?

9 A. Not him I'm aware of.

10 Q. Have you ever seen a picture of Bill
11 Clinton in Jeffrey Epstein's plane?

12 A. In his plane? I don't think so.

13 Q. Have you ever seen one in his homes?

14 A. Not that I can recall.

15 Q. Okay.

16 A. Oh, wait, wait. Back up. A picture of
17 Bill Clinton in the plane? Do you mean the picture
18 is on the wall in the airplane or a picture taken of
19 Bill Clinton on the plane?

20 Q. A picture of Bill Clinton on the wall of
21 the airplane.

22 A. I have a picture of me and actually the
23 crew with Bill Clinton on the plane, but it is not
24 on the wall of the airplane.

25 Q. And when was the picture of you with Bill

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2 Clinton taken?

3 A. I think it was the first flight.

4 Q. The flight that we just looked at?

5 A. Yes.

6 Q. To the best of your knowledge, is that the
7 first time that Bill Clinton flew with Jeffrey
8 Epstein or Ghislaine Maxwell?

9 A. To the best of my knowledge. It was the
10 first time that we had flown him.

11 Q. Okay. On flight No. 72, which is page 54,
12 March 10th.

13 A. Okay.

14 Q. The Boeing flies from St. Thomas to JFK;
15 is that right?

16 A. Yes.

17 Q. Is there any way of knowing when the
18 Boeing got to St. Thomas by these logs?

19 A. Yes, it got there on the 28th. Because it
20 is trip No. 71 above it. Oh, wait. Oh. Wait.
21 State the question again.

22 Q. Yes, exactly.

23 Do we know how or when the Boeing got to
24 St. Thomas? It is leaving out of St. Thomas on
25 flight 72, but flight 71 seems to me to land in Palm

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2 Beach.

3 A. Correct.

4 Q. So I'm just missing the kind of connection
5 there.

6 A. Yes. Me, too.

7 Q. Okay.

8 A. Yeah, I don't have an answer for that.

9 Q. Okay. Would somebody else have flown the
10 Boeing, while you were doing this simulator, the 6th
11 and 7th and 8th?

12 A. It is possible.

13 Q. That is one possible conclusion, based
14 upon what we have here?

15 A. That is probably what happened.

16 Q. Okay.

17 So then March 10th -- sorry. March 10th,
18 you fly to JFK, right?

19 A. Yes.

20 Q. March 4th, from JFK to Palm Beach. March
21 the 17th, from Palm Beach back to JFK. And then
22 March 19th, 2002, you fly from JFK to -- where is
23 that?

24 A. Luton, London.

25 Q. And who are your passengers?

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2 A. Bill Clinton. Doug Band. Three Secret
3 Service, Jeffrey Epstein, Ghislaine Maxwell, Sarah
4 Kellen.

5 Q. And the next day -- or, sorry, two days
6 later.

7 Do you know where those passengers stayed
8 in London?

9 A. I have to think about this one second.
10 No, in fact, I don't think they did. Because we
11 didn't spend the night there. We went there. I got
12 to the hotel. As soon as I got to the hotel, I got
13 word from Secret Service that President Clinton
14 wanted to leave that night, so we left that night.

15 So we made it to the hotel, the crew did,
16 but we were there not that long. Two or three
17 hours, four hours, maybe.

18 Q. Do you remember why he wanted to leave
19 that night?

20 A. No. No, because when we went there, we
21 thought we were going to be there for like probably
22 at least a couple of nights. But it didn't turn
23 out -- we didn't even spend one night there.

24 Q. Okay. So does this probably mean that you
25 got there late at night on the 19th, the early

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2 morning on the 21st?

3 A. We took off the 19th. So when we land
4 there, it is really the 20th. And probably when we
5 took off there, it is like after midnight or
6 thereabouts.

7 Q. And that is when you fly back to JFK?

8 A. Back to JFK, yes.

9 Q. And you went there with three Secret
10 Service and came back with 10?

11 A. Yes.

12 Q. How did that happen?

13 A. Well, there was an advance party waiting
14 for us when we got there and then when we came back,
15 they just flew back with us.

16 Q. What was the events that you were
17 traveling to London for?

18 A. I'm not sure. I would imagine, he was
19 probably giving a speech.

20 Q. Okay. And you came back with Bill
21 Clinton, Doug Band?

22 A. Yes.

23 Q. Who was Doug Band?

24 A. Doug was Bill Clinton's, he's an attorney,
25 and he was like his right-hand guy, really, as far

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2 as doing anything.

3 Q. Okay. And you also flew back with Jeffrey
4 Epstein, Ghislaine Maxwell, Sarah Kellen and Naomi
5 Campbell?

6 A. Yes.

7 Q. How did it happen that Naomi Campbell
8 joined the plane to come home?

9 A. I don't know. The same way she joined it
10 before I guess in Montreal. I don't know how she
11 was there. And one male, too. It looks like.

12 Q. All right. The next page is page 56,
13 flight 96.

14 A. Okay.

15 Q. Sorry. Let's back up to 94.

16 When the Boeing takes off from JFK, do you
17 know sometime during that trip that you are going to
18 be picking up President Clinton?

19 A. I think so. Let me see. We went to
20 Paris.

21 Yes, oh, yes. We knew that was going to
22 be a long trip.

23 Q. Okay.

24 A. So we knew at that point in time. I'm
25 almost certain that we knew.

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2 Q. What did you know about that trip?

3 A. We knew that was going to be a long trip
4 because we were going to go around the world.

5 So when we departed, it was a about a week
6 later, as I recall, that we picked up Clinton. We
7 left JFK on the 11th, a little less than a week.
8 Half a week later, we picked up Clinton and from
9 there, we went to -- Hong Kong.

10 Q. So you fly in to -- on the 20th, flight
11 99, Jeffrey Epstein, Ghislaine Maxwell, and Sarah
12 Kellen.

13 A. Right.

14 Q. You fly in to a Naval air base in Japan?

15 A. Correct.

16 Q. How were you given access to stay in the
17 Naval air base?

18 MR. PAGLIUCA: Object to foundation.

19 THE WITNESS: The airplane, you mean?

20 BY MR. EDWARDS:

21 Q. Yes. It looks like it is there two days.
22 That is why --

23 A. I guess because we were picking up
24 President Clinton.

25 Q. And do you know where Jeffrey Epstein,

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2 Ghislaine Maxwell and Sarah Kellen stayed?

3 A. I do not.

4 Q. Was there a room for them on the Naval air
5 base?

6 A. No, I don't think -- nobody stayed at the
7 Naval air base.

8 Q. All right. And then on the 22nd, you
9 leave the Naval air base with -- who is that on that
10 flight?

11 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
12 Kellen, President Bill Clinton, Mike, Doug Band,
13 Janis and Jessica.

14 Q. You flew into the Naval air base with
15 Jeffrey Epstein?

16 A. Plus six other passengers.

17 Q. Okay. Are those secret service?

18 A. Most likely.

19 Q. You flew in to the Naval air base with
20 Jeffrey Epstein, Ghislaine Maxwell and Sarah Kellen
21 only, right?

22 A. Right.

23 Q. And nobody stayed on the Naval air base?

24 A. No.

25 Q. And you are there to pick up Bill Clinton?

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2 A. Yes.

3 Q. And you pick up Bill Clinton and six
4 passengers plus Mike?

5 A. Correct.

6 Q. Doug Band, who you have already explained
7 who that is with relation to Bill Clinton, and Janis
8 and Jessica.

9 A. Yes.

10 Q. Do you know who they are?

11 A. Yes.

12 Q. Who are Janis and Jessica?

13 A. Secret Service.

14 Q. How do you remember that?

15 A. Well, there is probably 8, 8 or 9 Secret
16 Service people there, two of them were women. The
17 other 7 -- and it was just easier to remember the
18 two women's names than the 7 other guys' names.

19 Q. This entry on January 22nd, 2002, Jessica,
20 is that the same or a different Jessica from --

21 A. On which one?

22 Q. Sure. Sorry. May 22nd. I think I
23 butchered the date before.

24 A. Right.

25 Q. May 22nd, 2002. Is that the same Jessica

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2 as January 15th, 2002, flying with Jeffrey Epstein?

3 A. January 15th.

4 MR. REINHART: Flight 48.

5 BY MR. EDWARDS:

6 Q. Right. It is flight 48.

7 A. I'm don't think -- no, I they wouldn't be
8 the same Jessica, no.

9 Q. Okay. After you pick up President Bill
10 Clinton, where did you fly?

11 A. We went to Hong Kong.

12 Q. Do you know what the purpose was?

13 A. I believe he was giving a speech.

14 Q. All right. And then from there, where did
15 you fly?

16 A. That would be Shenzhen, Japan -- or China.

17 Q. Okay. And do you remember the purpose
18 there?

19 A. Speech.

20 Q. And then where did you fly?

21 A. Singapore.

22 Q. Again, another speech?

23 A. Another speech.

24 Q. During the course of these days, where did
25 President Bill Clinton sleep?

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2 A. I guess at a hotel somewhere. I'm not
3 sure.

4 Q. Did he stay at the same place as Jeffrey
5 Epstein, Ghislaine Maxwell and Sarah Kellen?

6 MR. PAGLIUCA: Foundation.

7 THE WITNESS: I don't know.

8 BY MR. EDWARDS:

9 Q. All right. Were meals served on the
10 plane?

11 A. Something was served, but I don't know if
12 you would call it a meal. Probably. I'm sure we
13 had catering and stuff. I just don't recall.

14 Q. That was just typical back then to have
15 meals, especially for the President, right?

16 A. Normally we do not. And we probably did
17 have catering back then, but I don't recall.

18 Q. Okay. Where did you fly from Singapore?

19 A. Singapore, VTBD, I don't know. You have
20 your cheat sheet over there?

21 Q. VTBD, mine says Thailand.

22 A. I was going to guess Thailand.

23 Then from Thailand, I think we went to --

24 Q. My cheat sheet says Brunei?

25 A. Exactly. You don't want to go there.

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2 Q. You don't?

3 A. No.

4 Q. Okay. Was the purpose a speech at each
5 location to the best of your knowledge?

6 A. To the best of my knowledge, it was.

7 Q. All right. Do you know why it was that
8 Jeffrey Epstein and Ghislaine Maxwell and Sarah
9 Kellen accompanied him?

10 A. No.

11 Q. And then did you leave?

12 MR. REINHART: Did you answer that
13 question?

14 THE REPORTER: He said no.

15 MR. REINHART: I didn't hear it.

16 BY MR. EDWARDS:

17 Q. Did you leave President Bill Clinton and
18 Doug Band and the Secret Service in Brunei?

19 A. Hmm. It is possible.

20 What is WRR?

21 Q. Not found. Sorry.

22 A. Not good.

23 Q. That is the only entry in here that is not
24 found.

25 But the next one, VCBI says Sri Lanka?

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2 A. Okay. Then if that says Sri Lanka, then,
3 yes, we probably did leave Clinton in Brunei, I
4 think. And I think we went from there down to Bali.
5 We went to Bali without --

6 Q. Without Bill Clinton?

7 A. Yes.

8 Q. What was the purpose of the trip to Bali?

9 A. Just to get away.

10 Q. And then to Sri Lanka?

11 A. Sri Lanka was just a fuel stop on the way
12 to Paris. Two fuel stops.

13 Q. That's in Dubai?

14 A. Yes.

15 Q. And then you get to Paris?

16 A. Correct.

17 Q. And then you fly back to London?

18 A. Yes. Yes.

19 Q. All right. Do you remember the purpose of
20 the trip to London?

21 A. Yes.

22 Q. What was that?

23 A. We had to have our APU changed on the
24 airplane. It quit working in Paris. And we landed
25 there.

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2 Q. All right. The next page, page 57,
3 June 21st. Flight 1570. Where is that flight
4 leaving from?

5 A. Palm Beach to the Bahamas.

6 Q. And who is on the flight from Palm Beach
7 to the Bahamas?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
9 Kellen, Cindy Lopez, Jean-Luc Brunel, Virginia
10 Roberts.

11 Q. All right. And that is on June 21st?

12 A. Yes.

13 Q. All right. And then there is a couple of
14 entries that say "reposition."

15 A. Right.

16 Q. That is flying back to Palm Beach and then
17 back down to the Bahamas?

18 A. Correct. Yeah, we left them there. And
19 we flew the airplane home.

20 Q. And then did you leave out of the Bahamas
21 on the 23rd.

22 A. Yes.

23 Q. Up to Teterboro.

24 And who are your passengers on flight
25 1573?

Confidential

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1 DAVID RODGERS

2 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
3 Kellen, Cindy Lopez, Juliana Borres, I guess,
4 Jean-Luc Brunel, Melissa Stahl.

5 Q. A Virginia Roberts was taken to the
6 Bahamas. Do you know where she went from there?

7 A. I do not.

8 Q. Do you remember a Frederic Fekkai?

9 A. What is the name again?

10 Q. Fekkai, F-E-K-K-A-I. Frederic Fekkai?

11 A. First name?

12 Q. Fred.

13 A. Fred.

14 Q. Hairdresser?

15 A. The last name sounds familiar.

16 Q. All right. He's on a flight No. 116 on
17 the Boeing.

18 A. Uh-huh.

19 Q. June 27th?

20 A. Okay. I see.

21 Q. And there are -- it looks like a bunch of
22 passengers. Do you remember Daralyn Priest?

23 A. No. Where is she?

24 Q. Middle column.

25 A. Daralyn. Oh, yes, I see her. Right. I

Confidential

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1 DAVID RODGERS

2 don't remember her.

3 Q. Do you remember that flight?

4 A. To Paris. Not really. It was a big
5 flight. We had a lot of people on it, which was
6 unusual, going to Paris. No, I don't.

7 Q. You don't remember it.

8 A. No.

9 Q. So you don't remember the purpose of the
10 flight?

11 A. No.

12 Q. July 2002, it is page 58. Go to flight
13 120.

14 A. Okay.

15 Q. LF?

16 A. That is Nice.

17 Q. And where do you go?

18 A. Tangiers.

19 Q. And then from Tangiers to?

20 A. To another place in Morocco. Marrakesh.
21 I think it is Marrakesh. I could be wrong on that
22 one. It is definitely Morocco.

23 Q. From there, is that where you pick up Bill
24 Clinton?

25 A. Let's see. GMME would be Rabat, the

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1 DAVID RODGERS

2 capital of Morocco, I believe.

3 Q. Did you know before this flight that you
4 at some point would be picking up Bill Clinton?

5 A. I think we did, yes.

6 Q. Who was on the flight with Bill Clinton?

7 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
8 Kellen, Prince Andrew, Cindy Lopez, President
9 Clinton, Doug Band, Mike, with Secret Service and 8
10 Secret Service people. So probably 9 Secret Service
11 people.

12 Q. So Mike is a person that is also -- that
13 is?

14 A. He's Secret Service, yes. That is just
15 what I recall. He was the lead guy of the Secret
16 Service.

17 Q. Where do you take Bill Clinton?

18 A. We went to the Azores for a fuel stop and
19 then we went to JFK. Kennedy, New York.

20 Q. Then on August 5th, in the Gulfstream, on
21 flight 1586, you leave from Teterboro and go to
22 Santa Fe; is that correct?

23 A. Correct.

24 Q. On that flight, you have Jeffrey
25 Epstein -- sorry, Jeffrey Epstein, Sarah Kellen and

Confidential

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1 DAVID RODGERS

2 two females?

3 A. Yes.

4 Q. Do you know who those two females were?

5 A. No.

6 Q. How long does the plane, the Gulfstream,
7 stay in Santa Fe?

8 A. Let's see. 1586, Gulfstream. I don't
9 really know, because apparently, we had 1586 and the
10 next one I see is 1589. So it flew three places,
11 but I wasn't on that trip.

12 Q. 1587 and 1588 are missing, right?

13 A. That is what I'm saying.

14 Q. Because you are not on it?

15 A. I'm not on the trip.

16 Q. And 1589?

17 A. Uh-huh.

18 Q. Leaving out of Santa Fe, who are the
19 passengers?

20 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
21 Kellen, Cindy Lopez, Virginia Roberts, Dan Moran,
22 Eduardo, Alfred, Margarita and Nick Simmons.

23 Q. Do you know how Virginia Roberts got to
24 Santa Fe?

25 A. No.

Confidential

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1 DAVID RODGERS

2 Q. Is there any way to get to Santa Fe from,
3 say, Florida -- well, strike that.

4 MR. PAGLIUCA: Bus, train, car.

5 BY MR. EDWARDS:

6 Q. Did you ever know Virginia Roberts to take
7 a train?

8 A. Not that I'm aware.

9 Q. Did you ever know her to take a bus?

10 MR. REINHART: To go to New Mexico?

11 THE WITNESS: Not that I'm aware. Maybe
12 she has, but I don't know about it.

13 BY MR. EDWARDS:

14 Q. Okay. I have a picture of her on
15 horseback at the ranch, so who knows.

16 Let's see. August 17th, sorry,
17 August 18th.

18 A. Okay.

19 Q. From Teterboro to Palm Beach?

20 A. Right.

21 Q. Who are your passengers?

22 A. Jeffrey Epstein, Virginia Roberts, one
23 female.

24 Q. All right. Do you remember who that
25 female was?

Confidential

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DAVID RODGERS

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify
that DAVID RODGERS personally appeared before
me and was duly sworn.

WITNESS my hand and official seal
this 8th day of June, 2016.

Kelli Ann Willis, RPR, CRR
Notary Public, State of Florida
Commission FF928291, Expires 2-16-20
+ + + + + + + + + + + + + + + +

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
Reporter do hereby certify that I was
authorized to and did stenographically report the
foregoing deposition of DAVID RODGERS; that a
review of the transcript was not requested; and
that the transcript is a true record of my
stenographic notes.

I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
with the action, nor am I financially interested
in the action.

Dated this 8th day of June, 2016.

KELLI ANN WILLIS, RPR, CRR

EXHIBIT 16

(Filed 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

May 18, 2016

9:04 a.m.

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

Deposition of JOHANNA SJOBERG, 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 Q. Okay. Great.

2 All right. Do you know a female by the
3 name of Ghislaine Maxwell?

4 A. Yes.

5 Q. And when did you first meet Ms. Maxwell?

6 A. 2001. March probably. End of
7 February/beginning of March.

8 Q. And how did you meet her?

9 A. She approached me while I was on campus at
10 Palm Beach Atlantic College.

11 Q. And what happened when she approached you?

12 A. She asked me if I could tell her how to
13 find someone that would come and work at her house.
14 She wanted to know if there was, like, a bulletin
15 board or something that she could post, that she was
16 looking for someone to hire.

17 Q. And what did you discuss with her?

18 A. I told her where she could go to -- you
19 know, to put up a listing. And then she asked me if
20 I knew anyone that would be interested in working
21 for her.

22 Q. Did she describe what that work was going
23 to be?

24 A. She explained that she lived in Palm Beach
25 and didn't want butlers because they're too stuffy.

1 And so she just liked to hire girls to work at the
2 house, answer phones, get drinks, do the job a
3 butler would do.

4 Q. And did she tell you what she would pay
5 for that kind of a job?

6 A. At that moment, no, but later in the day,
7 yes.

8 Q. And what did she say?

9 A. Twenty dollars an hour.

10 Q. Was there anybody else with Ms. Maxwell
11 when you met her?

12 A. There was another woman with her. I don't
13 recall her or what she looks like or how old she
14 was.

15 Q. And what happened next?

16 A. And then she asked me if I would be
17 interested in working for her. And she told me that
18 she was -- I could trust her and that I could jump
19 in her car and go check out the house at that moment
20 if I wanted.

21 And so I said, Sure, let's do it, and went
22 to her home with her.

23 Q. And where was that home?

24 A. In Palm Beach.

25 Q. And did she describe that home as being

1 magazines.

2 She and I went -- she wanted to take me
3 shopping to Worth Avenue, but it was a Sunday and
4 Nieman Marcus was closed, so we went back to, like,
5 a little book store. And I remember she bought, I
6 think, five pairs of reading glasses because she
7 thought Jeffrey would like them. He had them all
8 over the house. On every table there was reading
9 glasses.

10 And that's about it. It was a pretty
11 simple day.

12 Q. Were you paid that day for that work?

13 A. Yes.

14 Q. And how much were you paid? Do you
15 remember?

16 A. I don't remember how many hours I was
17 there -- I was there. She paid me cash.

18 Q. So Maxwell paid you?

19 A. Yes.

20 Q. And then was she the one who trained you
21 with what -- with respect to what you were supposed
22 to do during the day, directed you to, like you
23 said, go to --

24 A. I believe she was the one that was kind of
25 showing me around.

1 Q. And how long did you work in that position
2 answering phones and doing --

3 A. Just that one day.

4 Q. Just that one day.

5 And did your duties change?

6 A. Well, the next time she called me, she
7 asked me if I wanted to come over and make \$100 an
8 hour rubbing feet.

9 Q. And what did you think of that offer?

10 A. I thought it was fantastic.

11 Q. And did you come over to the house for
12 that purpose?

13 A. Yes.

14 Q. And when you came over to the house, was
15 Maxwell present?

16 A. I don't recall.

17 Q. And what happened that second time you
18 came to the house?

19 A. At that point, I met Emmy Taylor, and she
20 took me up to Jeffrey's bathroom and he was present.
21 And her and I both massaged Jeffrey. She was
22 showing me how to massage.

23 And then she -- he took -- he got off the
24 table, she got on the table. She took off her
25 clothes, got on the table, and then he was showing

1 me moves that he liked. And then I took my clothes
2 off. They asked me to get on the table so I could
3 feel it. Then they both massaged me.

4 Q. So it was more than a foot massage at that
5 point?

6 A. Yeah, it was mostly, like, legs and back.

7 Q. Was everybody in the room without clothes
8 on?

9 A. When they were on the massage table, yes.

10 Q. Did they -- when they got off the massage
11 table to perform the massage, did they dress or
12 did --

13 A. Yes.

14 Q. They dressed.

15 And do you recall who paid you for that
16 first day that you did the massages?

17 A. I don't recall.

18 Q. Do you recall whether Maxwell was at the
19 house during that first day when you were doing the
20 massage with Emmy and Jeffrey?

21 MS. MENNINGER: Objection, asked and
22 answered.

23 BY MS. McCAWLEY:

24 Q. You can answer.

25 A. I don't recall.

1 Q. Who did Emmy work for?

2 A. Ghislaine.

3 Q. Did Maxwell ever refer to Emmy by any
4 particular term?

5 A. She called her her slave.

6 Q. You said your job duties changed. Did you
7 start to travel as part of your job with Jeffrey and
8 Ghislaine?

9 A. Yes. The next time they called me, they
10 asked me to go to New York.

11 Q. And did you -- do you recall when that was
12 approximately?

13 A. That was Easter of 2001.

14 Q. And do you recall who was on the plane
15 with you for that trip?

16 MS. MENNINGER: Objection, leading, form.

17 MS. McCAWLEY: Actually, I'm going to stop
18 really quickly and I'm going to ask for the
19 next exhibit, please.

20 MS. MENNINGER: This is 3?

21 MS. McCAWLEY: Yes. I'm going to mark
22 this as Exhibit 3 for purposes of the
23 deposition.

24

25

1 leading.

2 THE WITNESS: Jeffrey Epstein; Ghislaine
3 Maxwell; AP and PK are the two women I do not
4 recall; Virginia Roberts; and myself.

5 BY MS. McCAWLEY:

6 Q. Do you recall how you flew back from the
7 location in the US Virgin Islands?

8 A. They put me on a commercial flight. I
9 wanted to be home in time for Easter.

10 Q. When you say "they," do you recall who
11 made those arrangements for you?

12 A. It could have been Ghislaine.

13 Q. Did you -- do you recall performing
14 massages while you were in the US Virgin Islands?

15 A. Yes.

16 Q. Who was involved in -- was there more than
17 one?

18 A. Yes. I massaged Ghislaine at one point.
19 And I massaged Jeffrey, Virginia and I, both, on the
20 beach.

21 Q. Were you dressed during the massage that
22 was on the beach?

23 A. Yes. Bikinis probably, most likely.

24 Q. Do you recall what Virginia was wearing?

25 A. I believe she was wearing a bathing suit,

1 to object and then you can still answer. No
2 one is going to stop you from answering. I
3 just need to get the objection on the record,
4 in the same way she needs to be able to talk
5 before you. My apologies. I'm not trying to
6 cut you off, but I am supposed to get it in
7 before you answer.

8 BY MS. McCAWLEY:

9 Q. Did Jeffrey ever tell you why he received
10 so many massages from so many different girls?

11 MS. MENNINGER: Objection, hearsay.

12 BY MS. McCAWLEY:

13 Q. You can answer.

14 A. He explained to me that, in his opinion,
15 he needed to have three orgasms a day. It was
16 biological, like eating.

17 Q. And what was your reaction to that
18 statement?

19 A. I thought it was a little crazy.

20 Q. And what did -- do you recall what -- when
21 you observed the other females giving massages, do
22 you recall what they would dress like? Did they
23 wear scrubs or did they typically wear normal
24 clothes?

25 A. Normal clothes.

1 MS. MENNINGER: Objection, leading.

2 BY MS. McCAWLEY:

3 Q. Do you believe that from your
4 observations, Maxwell and Epstein were boyfriend and
5 girlfriend?

6 A. Initially, yes.

7 Q. Did Maxwell ever share with you whether it
8 bothered her that Jeffrey had so many girls around?

9 MS. MENNINGER: Objection, leading,
10 hearsay.

11 THE WITNESS: No. Actually, the opposite.

12 BY MS. McCAWLEY:

13 Q. What did she say?

14 A. She let me know that she was -- she would
15 not be able to please him as much as he needed and
16 that is why there were other girls around.

17 Q. Did there ever come a time -- did you ever
18 take a photography class in school?

19 A. Yes.

20 Q. And did there ever come a time when
21 Maxwell offered to buy you a camera?

22 A. Yes.

23 MS. MENNINGER: Objection, leading.

24 BY MS. McCAWLEY:

25 Q. Did Maxwell ever offer to buy you a

1 camera?

2 MS. MENNINGER: Objection, leading.

3 THE WITNESS: Yes.

4 BY MS. McCAWLEY:

5 Q. Was there anything you were supposed to do
6 in order to get the camera?

7 MS. MENNINGER: Objection, leading.

8 THE WITNESS: I did not know that there
9 were expectations of me to get the camera until
10 after. She had purchased the camera for me,
11 and I was over there giving Jeffrey a massage.
12 I did not know that she was in possession of
13 the camera until later.

14 She told me -- called me after I had left
15 and said, I have the camera for you, but you
16 cannot receive it yet because you came here and
17 didn't finish your job and I had to finish it
18 for you.

19 BY MS. McCAWLEY:

20 Q. And did you -- what did you understand her
21 to mean?

22 A. She was implying that I did not get
23 Jeffrey off, and so she had to do it.

24 Q. And when you say "get Jeffrey off," do you
25 mean bring him to orgasm?

1 A. Yes.

2 Q. Did Ghislaine ever describe to you what
3 types of girls Jeffrey liked?

4 A. Model types.

5 Q. Did Ghislaine ever talk to you about how
6 you should act around Jeffrey?

7 A. She just had a conversation with me that I
8 should always act grateful.

9 Q. Did Jeffrey ever tell you that he took a
10 girl's virginity?

11 A. He did not tell me. He told a friend of
12 mine.

13 Q. And what do you recall about that?

14 MS. MENNINGER: Objection, hearsay,
15 foundation.

16 THE WITNESS: He wanted to have a friend
17 of mine come out who was cardio-kickboxer
18 instructor. She was a physical trainer.

19 And so I brought her over to the house,
20 and he told my friend Rachel that -- he said,
21 You see that girl over there laying by the
22 pool? She was 19. And he said, I just took
23 her virginity. And my friend Rachel was
24 mortified.

25

1 BY MS. McCAWLEY:

2 Q. Based on what you knew, did Maxwell know
3 that the type of massages Jeffrey was getting
4 typically involved sexual acts?

5 MS. MENNINGER: Objection, foundation,
6 leading.

7 THE WITNESS: Yes.

8 BY MS. McCAWLEY:

9 Q. What was Maxwell's main job with respect
10 to Jeffrey?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Well, beyond companionship,
13 her job, as it related to me, was to find other
14 girls that would perform massages for him and
15 herself.

16 BY MS. McCAWLEY:

17 Q. Did Maxwell ever refer to the girls in a
18 particular way?

19 A. At one point when we were in the islands,
20 we were all watching a movie and she called us her
21 children.

22 Q. Did anybody respond to that?

23 A. I don't recall.

24 Q. Did she ever refer to herself as a mother?

25 A. Yes, like a mother hen.

1 Q. Do you remember anything notable about the
2 phone calls?

3 A. I just remember I always had to say, He's
4 unavailable, can I take a message?

5 Q. And where did you take a message?

6 A. On a little notepad next to the phone.

7 Q. Do you recall any small children calling
8 the house that day?

9 A. No.

10 Q. Were you speaking to anyone about their
11 school experience or anything like that?

12 A. No.

13 Q. Did you take any messages for famous
14 people?

15 A. They could have been famous and I would
16 have been clueless.

17 Q. Did you take messages at any other point
18 during the time that you worked with Jeffrey?

19 A. No.

20 Q. And you said you remember at the end of
21 that day being paid by Ghislaine?

22 A. Yes.

23 Q. And you were paid for doing the errands
24 and answering phones and whatever else you did?

25 A. Yes.

1 Q. When you came upstairs, where was Virginia
2 sitting?

3 A. I don't remember.

4 Q. Do you remember what she was wearing?

5 A. No.

6 Q. She was already there when you got back
7 from sightseeing?

8 A. Yes.

9 Q. Tell me what happened with the caricature.

10 A. Ghislaine asked me to come to a closet.
11 She just said, Come with me. We went to a closet
12 and grabbed the puppet, the puppet of Prince Andrew.
13 And I knew it was Prince Andrew because I had
14 recognized him as a person. I didn't know who he
15 was.

16 And so when I saw the tag that said Prince
17 Andrew, then it clicked. I'm like, that's who it
18 is.

19 And we went down -- back down to the
20 living room, and she brought it in. It was just
21 funny because -- he thought it was funny because it
22 was him.

23 Q. Tell me how it came to be that there was a
24 picture taken.

25 MS. McCawley: Objection.

1 THE WITNESS: I just remember someone
2 suggesting a photo, and they told us to go get
3 on the couch. And so Andrew and Virginia sat
4 on the couch, and they put the puppet, the
5 puppet on her lap.

6 And so then I sat on Andrew's lap, and I
7 believe on my own volition, and they took the
8 puppet's hands and put it on Virginia's breast,
9 and so Andrew put his on mine.

10 BY MS. MENNINGER:

11 Q. And this was done in a joking manner?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: Yes.

14 BY MS. MENNINGER:

15 Q. Do you recall a photo being taken of that
16 event?

17 A. Yes.

18 Q. You've never seen the photo?

19 A. No.

20 Q. You don't know whose camera it was?

21 A. No.

22 Q. Virginia was sitting on the couch next to
23 Andrew, not in a big leather armchair?

24 A. Maybe. I'm just trying to remember how I
25 remember it.

1 exposed her bra, and she grabbed it and pulled it
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told
5 her that he had taken this girl's virginity, the
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it
8 takes the pressure off of her to have other girls
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if
14 Maxwell ever asked you to perform any sexual acts,
15 and I believe your testimony was no, but then you
16 also previously stated that during the camera
17 incident that Maxwell had talked to you about not
18 finishing the job.

19 Did you understand "not finishing the job"
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that
24 question.

25 What did you understand Maxwell to mean

1 when she said you hadn't finished the job, with
2 respect to the camera?

3 MS. MENNINGER: Objection, leading, form.

4 THE WITNESS: She implied that I had not
5 brought him to orgasm.

6 BY MS. McCAWLEY:

7 Q. So is it fair to say that Maxwell expected
8 you to perform sexual acts when you were massaging
9 Jeffrey?

10 MS. MENNINGER: Objection, leading, form,
11 foundation.

12 THE WITNESS: I can answer?

13 Yes, I took that conversation to mean that
14 is what was expected of me.

15 BY MS. McCAWLEY:

16 Q. And then you mentioned, I believe, when
17 you were testifying earlier that Jeffrey told you a
18 story about sex on the plane. What was that about?

19 MS. MENNINGER: Objection, hearsay.

20 THE WITNESS: He told me one time Emmy was
21 sleeping on the plane, and they were getting
22 ready to land. And he went and woke her up,
23 and she thought that meant he wanted a blow
24 job, so she started to unzip his pants, and he
25 said, No, no, no, you just have to be awake for

1 A. No.

2 Q. Was it in the context of anything?

3 A. About the camera that she had bought for
4 me.

5 Q. What did she say in relationship to the
6 camera that she bought for you and taking
7 photographs of you?

8 A. Just that Jeffrey would like to have some
9 photos of me, and she asked me to take photos of
10 myself.

11 Q. What did you say?

12 A. I don't remember saying no, but I never
13 ended up following through. I think I tried once.

14 Q. This was the pre-selfie era, correct?

15 A. Exactly.

16 Q. I want to go back to this: You testified
17 to two things just now with Sigrid that you said
18 were implied to you.

19 A. Okay.

20 Q. The first one was it would take pressure
21 off of Maxwell to have more girls around?

22 A. Right.

23 Q. What exactly did Maxwell say to you that
24 led you to believe that was her implication?

25 A. She said she doesn't have the time or

1

2

C E R T I F I C A T E

3

STATE OF FLORIDA)

: ss

4

COUNTY OF MIAMI-DADE)

5

I, KELLI ANN WILLIS, a Registered

6

Professional, Certified Realtime Reporter and

7

Notary Public within and for The State of

8

Florida, do hereby certify:

9

That JOHANNA SJOBERG, the witness whose

10

deposition is hereinbefore set forth was duly

11

sworn by me and that such Deposition is a true

12

record of the testimony given by the witness.

13

I further certify that I am not related

14

to any of the parties to this action by blood

15

or marriage, and that I am in no way interested

16

in the outcome of this matter.

17

IN WITNESS WHEREOF, I have hereunto set

18

my hand this 18th day of May, 2016.

19

20

KELLI ANN WILLIS, RPR, CRR

21

22

23

24

25

EXHIBIT 17

(Filed Under Seal)

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL,

Defendant.

VIDEO-DEPOSITION Sky Roberts
OF:

TAKEN BY: Defendant

REPORTED BY: Karla Layfield, RMR
Stenographic Court Reporter
Notary Public
State of Florida at Large

DATE AND TIME: May 20, 2016; 8:33 a.m.

PLACE: Millhorn Law Firm
11294 North US Highway 301
Oxford, Florida

APPEARANCES: Laura A. Menninger, Esquire
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Fort Lauderdale, Florida 33301
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ALSO PRESENT: Kenneth Sarcony, Videographer

Owen & Associates Court Reporters
P.O. Box 157, Ocala, Florida
352.624.2258 * owenassoc@aol.com

1 Q Do you remember there being a job posting that
2 you felt like was appropriate for Virginia or did you just
3 go out and talk to the woman who ran the spa area on your
4 own?

5 A I just talked to Angela.

6 Q Okay. Do you recall whether this was intended
7 to be a full-time job?

8 A I don't remember if it was full time or just
9 summer jobs or, you know, during season. It was probably
10 for a season because Mar-a-Lago is seasonal.

11 I mean, I was there year round but a lot of
12 people are seasonal, you know, because it's like
13 snowbirds, you know, summertime comes and nobody wants to
14 be down in south Florida.

15 Q What would you call the season, the seasonal
16 aspect of Mar-a-Lago? What's the season?

17 A Probably from September or October to, you know,
18 maybe May, I guess.

19 Q Is that the coolest time?

20 A Times of the year, yes.

21 Q And it's more guests that come during that
22 period of time?

23 A Yes.

24 Q And is there more staff brought on during that
25 period of time?

1 we'll call her Angela.

2 A We've got to call her something, but, you know,
3 I didn't really know what her job title was, but I was
4 glad that they would give her a job.

5 Q Right.

6 A You know, and that, you know, I was hoping she
7 would be happy; that way she could, you know, go back and
8 forth to work with me. She didn't have to drive or
9 nothing.

10 Q Did you drive to and from work with her?

11 A Yes. Pretty sure I did, yeah.

12 Q Do you remember her hours being relatively the
13 same as yours?

14 A I'm pretty sure they were. Yes.

15 Q Do you recall her being in school at the same
16 time?

17 A No, I don't recall. I don't remember if she was
18 in school or not.

19 Q Is it possible it was over, say, winter break
20 or --

21 A I don't remember. I'm sorry. This is so long
22 ago. I mean, some things stick in my mind but some things
23 I just don't remember.

24 Q Do you remember whether Virginia wore a uniform?

25 A Yes, I think she did. Yeah. I think everybody

1 Q So you don't know if it was a couple days or a
2 couple weeks or a couple months or a couple years?
3 Anything in that --

4 A Well, it wasn't a couple years. It might have
5 been two weeks to two months. I don't know. It wasn't a
6 whole long time, you know.

7 Q Where were you when Virginia told you she might
8 be going to try to get this other job?

9 A Probably at work. She might have told me, like,
10 at lunch or whatever. I don't remember. That was so many
11 years ago. I just remember she said Ms. Maxwell was going
12 to, you know, get her a job with Jeffrey Epstein and learn
13 massage therapy. And I thought, well, that's great, you
14 know, because learning new jobs is all about life, you
15 know.

16 You've got to learn each -- you know, I've
17 learned a lot of different things over my lifetime so it's
18 good to learn every new job you can because that can help
19 you later in life and that's what I think I told her.

20 Q Okay. So the best you can recall today is you
21 had a conversation with her sometime at lunch perhaps at
22 Mar-a-Lago where she told you she was going to try to get
23 another job?

24 A Yes. And I thought that was a good thing.

25 Q Do you know now that you recall that, what

1 A No.

2 Q Did she ever call you from that home?

3 A Not that I know of.

4 Q Was this when she was still living at home with
5 you on Rackley Road?

6 A Yes. Yes.

7 Q Not Rackley Drive.

8 A Rackley Road.

9 Q Do you know whether Michael was living with you
10 at Rackley Road at the time or not?

11 A I don't think so. I don't remember. I didn't
12 care for Michael. Of course, what parent cares for your
13 daughter's boyfriend.

14 Q Why didn't you care for Michael?

15 A I didn't think anybody was good enough for my
16 daughter but that's just me.

17 Q I suspect you're right about all fathers.

18 Do you remember her telling you anything about
19 what her job with Mr. Epstein was going to be or was?

20 A She said it was going to be massage therapy.

21 Q Okay. Did she tell you she was getting some
22 training?

23 A Yes.

24 Q Did she tell you about the training?

25 A No. She just said she was being trained in

1 message therapy.

2 Q All right. When she came home at night from
3 working with Mr. Epstein, did she look distressed to you
4 in any way?

5 A Not that I remember.

6 Q Okay. Did she report any complaints about her
7 job with Mr. Epstein?

8 A Not to me.

9 Q Okay. Did she report them to anyone else who
10 then reported them to you?

11 A No.

12 Q Your wife, for example?

13 A I have no idea. Like I said, if she did tell my
14 wife, I never heard about it.

15 Q Okay. Have you ever met Ms. Maxwell?

16 A Not that I remember ever meeting her.

17 Q Do you know what she looks like?

18 A No.

19 Q Did you ever meet anyone else who worked with
20 Mr. Epstein?

21 A No.

22 Q Do you remember anyone else who worked for
23 Mr. Epstein bringing your daughter home, for example?

24 A No.

25 Q Did your daughter ever move into the home where

1 Q Okay. But your hours, if I understood you
2 right, were approximately 7:00 a.m. to 3:00 p.m.?

3 A Yes.

4 Q And Tuesday through Saturday?

5 A Yes.

6 Q Those hours would be the same time as somebody
7 her age would have been in high school?

8 A Yes.

9 Q Okay. So does that -- does that give an
10 indication to you that the short period of time she was
11 working was during the summer when there was not school?

12 A It seems to be that way.

13 Q Okay.

14 A I mean, to me, yeah.

15 Q It could have been a summer job?

16 A Yes, it could have been.

17 Q Okay. You would not have, as a father, had her
18 working somewhere instead of going to school?

19 A No, I wouldn't.

20 Q And the day that Virginia came and spoke to you
21 about meeting someone named Ms. Maxwell who was offering
22 her another job, do you remember the conversation that you
23 had with Virginia on that day?

24 A No, not really. I just remember Virginia saying
25 that, you know, she met Ms. Maxwell at the spa and that

1 Q And there it describes her job at Mar-a-Lago as
2 lasting from August 2000 to September of 2001. Do you see
3 that?

4 A Yes.

5 Q Does that refresh your memory about how long she
6 was working there?

7 MR. EDWARDS: Form.

8 THE WITNESS: She didn't work that long.

9 MS. MENNINGER: Okay.

10 THE WITNESS: Like I say, it was more, like,
11 a couple of weeks. It wasn't --

12 BY MS. MENNINGER:

13 Q Well, earlier you testified it, might have been
14 a couple of months?

15 A Well, you know, for me, two weeks, two months, I
16 mean, I don't even remember how long I worked at
17 Mar-a-Lago. I told you I worked there six years and
18 according to them, it was, like, three years. Seemed like
19 six.

20 Q Well, earlier you testified that Mar-a-Lago was
21 more of a seasonal place, correct?

22 A Yes, well, it is seasonal. But I mean, they
23 could be open up the spa area during the summer too
24 because I'm sure a lot of people in Palm Beach come to get
25 massages and things like that. I mean, you know, the only

1 part they close off is where the chefs and all that, where
2 they didn't do any more big events and stuff.

3 Q Okay.

4 A But I think the kitchen was still open. I mean,
5 they had a dining room.

6 Q So if she didn't work there that long
7 August 2000 -- even though August is in the summer -- it
8 would not be unusual in your mind?

9 A No.

10 Q Okay. So she could have started working in
11 August of 2000, correct?

12 A She could have, yeah.

13 Q And while you don't think she worked all the way
14 until September of 2001 --

15 A No.

16 Q -- that would be consistent with your
17 recollection of it being more seasonal in the fall,
18 September --

19 MR. EDWARDS: Object to the form.

20 THE WITNESS: Yes.

21 BY MS. MENNINGER:

22 Q So if she worked in the fall, September,
23 October, something like that, that seems like that
24 accords with your memory, correct?

25 MR. EDWARDS: Object to the form.

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF MARION

I, Karla Layfield, RMR, Stenographic Court Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of Sky Roberts; that said witness was duly sworn to testify truthfully; and that the foregoing pages, numbered 1 through 142, inclusive, constitute a true and correct record of the testimony given by said witness to the best of my ability.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor am I financially interested in the action.

WITNESS MY HAND this _____ day of May, 2016, at Ocala, Marion County, Florida.

Karla Layfield, RMR
Stenographic Court Reporter

EXHIBIT 18

(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-80380, 98-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF JUAN ALESSI
VOLUME I

Tuesday, September 8, 2009
10:12 a.m. - 3:45 p.m.

2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33401

Reported By:

Sandra W. Townsend, FPR
Notary Public, State of Florida
PROSE COURT REPORTING AGENCY
West Palm Beach Office

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EXHIBITS

| NUMBER | DESCRIPTION | PAGE |
|------------------|----------------------|------|
| Exhibit number 1 | Photographs | 45 |
| Exhibit number 2 | Transcript | 130 |
| Exhibit number 3 | Incident Report | 137 |
| Exhibit number 4 | Incorporation Papers | 149 |
| Exhibit number 5 | Incorporation Papers | 150 |

1 (Pages 1 to 4)

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

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1 MS. EZELL: I'm going to ask -- I don't know
2 whether you've still been serially designating
3 Exhibits or whether we're doing them separately for
4 deposition.

5 MR. CRITTON: I think we cannot trust that
6 people will do them serially. I'd do them with
7 each one.

8 MS. EZELL: Then would you mark this, please,
9 as Exhibit 1 to this deposition.

10 And I'm just going to state on the record that
11 I will keep that original. We will not attach it
12 to the deposition.

13 (Exhibit number 1 was marked for
14 identification purposes and retained by Counsel for the
15 Plaintiffs.)

16 THE WITNESS: Yes, that's --

17 BY MS. EZELL:

18 Q. Can you identify that -- the young woman in
19 those pictures?

20 A. Yes.

21 Q. Who is it?

22 A. That's V. -- V. Now that you says R., that
23 is V.R. definite, a hundred percent.

24 MR. CRITTON: Let me just note my objection,
25 as I did in A. Rod's deposition or Mr. Rodriguez's

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1 deposition, that I know you're going to confiscate
2 Exhibit number 1. I think it's inappropriate. I
3 think I should be allowed to have a copy of
4 Exhibits that are being used in deposition. But
5 I'll file a motion with the Court so we don't get
6 into a pulling match over your Exhibits.

7 MR. BERGER: I would ask that the court
8 reporter initial that.

9 MS. EZELL: Sure.

10 Oh, you did?

11 MR. WILLITS: She marked it.

12 MR. BERGER: Did she put her initials or did
13 she just put a number or a letter?

14 MR. CRITTON: She's nodding that she did
15 everything that she usually does, which means,
16 initials, date and number.

17 MR. MERMELSTEIN: You can talk.

18 MR. WILLITS: But when you talk, use your
19 initials.

20 BY MS. EZELL:

21 Q. How old did you think V.R. was at the time she
22 began coming to Mr. Epstein's home?

23 A. She could have been 17, 18, 19.

24 Q. Could she have also been 15?

25 MR. CRITTON: Form.

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1 THE WITNESS: Could have been. But, you know
2 I am not -- I don't think I am a very good judge of
3 ages. If you ask me how old you are, I really
4 couldn't tell you.

5 MR. CRITTON: Kathy thinks she's 25.

6 MS. EZELL: In my dreams.

7 THE WITNESS: Now, again, I must tell you, I
8 was never told to check any i.d.s on any of the
9 people who work at the house.

10 BY MS. EZELL:

11 Q. I understand that. And, so, I think I'm just
12 trying to establish that you didn't consider it part of
13 your job description to worry about or consider the
14 ages --

15 A. No.

16 Q. -- of the young women that came there?

17 A. Absolutely not. Absolutely not.

18 Q. And, so, you never really focused on that or
19 particularly thought about it if they seemed young?

20 MR. CRITTON: Form.

21 THE WITNESS: I don't -- I didn't see that
22 many young girls, you know, young, underage girls
23 at the house. I never saw except the two girls
24 that I mentioned that I think it was underage was
25 N. for sure because she was still in high school.

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1 And she -- she had dinner with her mother, a couple
2 times with her mother. And she become an actress.
3 She's an actress and she has done movies. And he
4 help her in her career.

5 That's the only girl that I knew she was young
6 because she was going to high school and I pick her
7 up from high school sometimes. But she was not a
8 massage therapist. She will go for dinner. And
9 they will go for the movies and she sang sometimes
10 because she was a singer. So she sung at the
11 house. Beautiful girl. Very talented.

12 That's the only girl that I know that it
13 was -- I would says, underage.

14 BY MS. EZELL:

15 Q. Okay. Did -- who told you that V.R. was a
16 massage therapist?

17 A. Nobody.

18 Q. Did you assume that she was a massage
19 therapist because you were told she was coming to give a
20 massage?

21 A. No. I assumed she was a massage therapy
22 because I was -- I drove Ms. Maxwell to Mar-a-lago,
23 Donald Trump's residence. And I wait in the car while
24 Ms. Maxwell got a -- I think it was a facial or massage.
25 I don't know. But that day I remember this girl, V.,

12 (Pages 45 to 48)

| Page 49 | Page 51 |
|--|---|
| <p>1 walking down from the main lobby towards the spa of
2 Mar-a-lago. And I was driving Ms. Maxwell up, up the
3 ramp. It's a little ramp there.
4 And Ms. Maxwell says, stop. And she went and
5 talked to -- she went inside.
6 And that afternoon around 5:00 I saw V. came.
7 She came to the house already, so she was there already.
8 That was the first day I knew. And then she would come
9 regularly.
10 Q. Did you ever meet any of V.'s family?
11 A. No. I think she was -- one time I think her
12 father drove her there. And I met -- I don't know if it
13 was the boyfriend or husband or -- but he had to wait,
14 make him wait outside while she was at the house.
15 Q. Do you know the name or recognize the name
16 Tony Santiago?
17 A. I think it was him.
18 Q. That was her --
19 A. I know he had an old beat-up car, Camaro or
20 Mustang. I know it was very old car that I make him
21 wait on the street one time. I make him come out of the
22 driveway because we have to move some cars around.
23 Q. Did there ever come a time when Tony Santiago
24 was welcome in the kitchen?
25 A. I think he came once in the kitchen, but</p> | <p>1 there. So I would says, between three months maybe
2 before I left. And I think I left at the end of the
3 year, so it could have been -- I remember it was a very
4 hard day because I had to wait in the sun outside in a
5 convertible and I was dying, waiting for an hour for
6 Ms. Maxwell. I think it was in the summer of 2002.
7 Q. And if I remember correctly, you left in
8 November or December of 2002?
9 A. Yes.
10 Q. So that might have been perhaps July or August
11 of 2002?
12 A. Uh-huh.
13 Q. And, so, as I understand it, you only saw V.R.
14 come to that house during the last three months of your
15 time at Mr. Epstein's?
16 A. Yes.
17 Q. Do you have any -- any sense or can you
18 approximate how many times she came?
19 A. I cannot give you a number, but I would says,
20 two, three times a week.
21 Q. You mentioned that sometimes you would have to
22 call these massage therapists in the middle of the
23 night. Did you ever have to call V. for Mr. Epstein in
24 the middle of the night?
25 MR. CRITTON: Form.</p> |
| Page 50 | Page 52 |
| <p>1 Ms. Maxwell told me to get him out.
2 Q. Did she tell you why?
3 A. No. She didn't -- I guess she didn't want to
4 become, you know, everybody -- because some of these
5 people came with their husbands and they wait outside.
6 And I guess she didn't want this to become a norm for
7 everybody to bring their companions while they have --
8 they will do a massage for her.
9 Q. During the time you were there, did you ever
10 know of Tony Santiago bringing any other girls to
11 Mr. Epstein?
12 A. No. I knew that sometimes I saw V. bring
13 other girls with her, not Tony Santiago.
14 Q. Do you remember the names of any of those
15 girls --
16 A. No, I don't.
17 Q. -- that V. brought?
18 A. That was at the end of my stay there. No.
19 That was a very -- at the very end of the last month of
20 my stay.
21 Q. Did you give -- I don't believe I asked you,
22 but if I did, forgive me. Did you give us an
23 approximate year in which you were taking Ms. Maxwell to
24 Mar-a-lago and saw V.R. for the first time?
25 A. That was at the -- at the end of my stay</p> | <p>1 THE WITNESS: No. No.
2 BY MS. EZELL:
3 Q. Did there come a time while you were there
4 that V.R. stayed in the house?
5 MR. CRITTON: Form.
6 THE WITNESS: I don't think so. I cannot
7 remember. No.
8 BY MS. EZELL:
9 Q. How many bedrooms were there upstairs?
10 A. One, two, three -- one, two, three, four --
11 four -- so that would be five, five bedrooms.
12 Q. Five. And, so, would one have been
13 Mr. Epstein's bedroom?
14 A. Yes. His quarters was big, huge quarters.
15 Q. Sort of a suite?
16 A. Yeah. And he has -- this is the room. His
17 bathroom was here and her bathroom was here. The main
18 room was here. And we have -- it was two sets of doors
19 before -- two sets of double doors before you can go
20 into the suite. There was one on top of the stairway
21 and one in the middle of the hallway. And then you walk
22 into the -- into the suite.
23 Q. Okay. And you -- you just put a red eight by
24 11 folder in front of you?
25 A. Yeah.</p> |

13 (Pages 49 to 52)

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1 A. Yes. Before she was married, yeah. They
2 split up and she went her own way.

3 Q. Did she marry a Glen Dubin (phonetics)?

4 A. That's correct. And Mr. Dubin used to come to
5 the house, too.

6 Q. Do you know, was Sarah Kellen ever one of the
7 massage therapists before she became an assistant?

8 A. I don't know if she was a massage therapist.

9 I don't remember setting up a massage table for her. I
10 think she was an assistant. And she would call -- at
11 the end of my stay, I was -- tried to pull aside from my
12 obligations and Sarah was doing all the phone calls and
13 all the arrangement and all the looking out for these
14 girls for the -- for massage therapists. They were
15 constantly.

16 Q. When did that role get transferred from you to
17 Ms. Maxwell, the role of looking after girls and calling
18 the girls?

19 A. I didn't look after -- out for girls.

20 Ms. Maxwell was the one that recruit -- I remember one
21 occasion or two occasions she would says to me, John,
22 give me a list of all the spas in Palm Beach County.

23 And I will drive her from one to the other one to PGA
24 and Boca. And she will go in, drop credit cards -- not
25 credit cards, but business cards, and she come out. And

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1 then we go to -- she will recruit the girls. Was
2 never -- never done by me or Mr. Epstein or anybody
3 else, that I know.

4 I don't know about Sarah because Sarah was
5 there at the last, last -- probably last weeks of my
6 stay there. So I cannot say anything about Sarah.

7 Q. Was there any point in time -- well, let me
8 ask you this way: Did -- you said sometimes you would
9 call the girls to come --

10 A. Uh-huh.

11 Q. -- to give them massage. And sometimes
12 Ms. Maxwell would?

13 A. Yeah.

14 Q. Did there come a time when she took that over
15 entirely from you --

16 A. No.

17 Q. -- or that continued --

18 A. That's continued.

19 Q. -- until you left?

20 A. Yeah.

21 Q. Do you remember, is Jeffrey Epstein godfather
22 to one of the Dubin children?

23 A. I don't know if he godfather. I don't
24 remember that. But he was very fond to these children,
25 the children.

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1 Q. And they called him uncle, you said?

2 A. They called him uncle.

3 Q. Did you ever learn what Tony Santiago did for
4 a living?

5 A. No.

6 Q. Have you had any occasion to see him since the
7 time you left Mr. Epstein's employ?

8 A. No.

9 Q. And you don't -- do you have any idea where he
10 is?

11 A. I have no idea. I remember an incident, one
12 time the -- I went to pick her up at Royal Palm Beach
13 and she was crying and I went and knock at the door and
14 she was crying. And she says, well, -- I think it was
15 Tony or -- because she used to live with these other
16 guys, too. There were two guys and her or two couples.
17 I don't know the arrangements there. But I remember
18 that she told me the -- Tony or her boyfriend had got
19 mad and ripped the furniture, he cut the furniture in
20 pieces and he even broke the screens. Because I was --
21 when I went into to knock the door, the screen was all
22 ripped up like it was cut.

23 And she told me that he got mad at -- I don't
24 know what happened. I never saw him in there.

25 Q. Did she tell you he had hit her or beaten her

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1 at all?

2 MR. CRITTON: Is the she, V., V.R.?

3 MS. EZELL: Yes. Thank you.

4 BY MS. EZELL:

5 Q. Did you ever see during the time you were
6 there photographs of V. in the house, the Epstein house?
7 V.R. in the Epstein house?

8 A. I don't think so. I don't think so.

9 Q. Did you ever see photographs of V.R. in
10 Ms. Maxwell's albums?

11 A. No.

12 Q. At the time you were employed by Mr. Epstein,
13 were there any hidden cameras?

14 A. No.

15 Q. You do know that he installed some after you
16 left, correct?

17 MR. CRITTON: Correct.

18 THE WITNESS: I don't know.

19 BY MS. EZELL:

20 Q. Wasn't there a camera involved in the incident
21 that -- the incident in which you took money from
22 Mr. Epstein?

23 A. Yeah. Yes. But I don't know if he install it
24 or not. That's what he told me.

25 Q. Okay.

15 (Pages 57 to 60)

Page 77

1 Q. What kind of costume?

2 A. I don't know. It was a black, shiny costume.
3 I never saw it on her.

4 Q. Was it leather?

5 A. No. I think it was like a vinyl. But we were
6 very fussy about touching any of that stuff. We just...

7 MS. EZELL: No other questions. Thank you,
8 sir.

9 THE WITNESS: You're welcome.

10 MR. LANGINO: I shouldn't have more than a
11 half hour's worth of questions, if everybody is
12 okay to power through.

13 MR. BERGER: I probably have a half hour to an
14 hour.

15 MR. LANGINO: Okay.

16 MR. BERGER: Unless you cover what I cover.

17 MR. MERMELSTEIN: I could say the same thing,
18 so probably less than that.

19 MR. LANGINO: So I guess my question is --

20 MR. BERGER: I think we ought to take a break.

21 MR. LANGINO: That was my question.

22 MR. BERGER: We're going to take a break.

23 Do you have any problem with that?

24 THE WITNESS: No. Whatever you guys want to
25 do.

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1 (Lunch recess.)
2 (Continued to Volume II.)
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Page 79

1 CERTIFICATE OF OATH
2 STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5

6 I, the undersigned authority, certify that
7 JUAN ALESSI personally appeared before me and was duly
8 sworn on the 8th day of September, 2009.
9

10 Dated this 19th day of September, 2009.
11

12
13
14
15  
16 Sandra W. Townsend, Court Reporter
17 Notary Public - State of Florida
18 My Commission Expires: 6/26/12
19 My Commission No.: DD 793913
20
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Page 80

1 CERTIFICATE
2 STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5


6 I, Sandra W. Townsend, Court Reporter and
7 Notary Public in and for the State of Florida at Large,
8 do hereby certify that the aforementioned witness was by
9 me first duly sworn to testify the whole truth; that I
10 was authorized to and did report said deposition in
11 stenotype; and that the foregoing pages numbered 1 to
12 78, inclusive, are a true and correct transcription of
13 my shorthand notes of said deposition.
14

15 I further certify that said deposition was
16 taken at the time and place hereinabove set forth and
17 that the taking of said deposition was commenced and
18 completed as hereinabove set out.

19 I further certify that I am not attorney or
20 counsel of any of the parties, nor am I a relative or
21 employee of any attorney or counsel of party connected
22 with the action, nor am I financially interested in the
23 action.

24 The foregoing certification of this transcript
25 does not apply to any reproduction of the same by any
means unless under the direct control and/or direction
of the certifying reporter.

Dated this 19th day of September, 2009.

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21 
22 Sandra W. Townsend, Court Reporter
23
24
25

20 (Pages 77 to 80)

1 Q. -- would be the young one?

2 A. Yeah.

3 Q. You stated that Ms. Maxwell was very hard on
4 you and you got blamed for everything, and that you --
5 you liked the job and you liked Mr. Epstein, but you
6 didn't like working for Mrs. Maxwell?

7 A. That's correct.

8 Q. Can you tell me why, other than that she
9 blamed you for everything?

10 A. She came from a very wealthy family and she
11 was -- just my opinion; I give my personal opinion --
12 that she was rotten spoiled and she tried to drive the
13 house like a palace and not a home.

14 I was -- I discussed it with her, many, many
15 times we have discussions. And sometimes I even refuse
16 to do her orders, knowing that I was going to be backed
17 up by Mr. Epstein or do the right thing, my thinking of
18 running the house should be. But we never had a good
19 relationship at all from the beginning, I don't think
20 so. But I was -- have to be her driver and she will go
21 and shop all over the malls and I will have to go behind
22 her, pay for it and bring the bags to the car.

23 Next day or the same day she will do shopping
24 and buy and say, John, go to this store and get it. It
25 was a lot of work. It was a lot that she created and

1 most of this jobs that she created.

2 Q. And one of those things you also had to do
3 with her was to take her to different spas?

4 A. Yes.

5 Q. And there she would recruit young women to
6 come and do massages?

7 A. Because she was English. And she didn't know
8 the area too much as well as I knew. So she -- she
9 says, John, make a list of all the massage -- the spas
10 in the area from Jupiter to Boca Raton. And we went to
11 all the main spas. And then we went to the schools for
12 massage therapists, and all the massage parlors, and
13 massage, the small massage.

14 So I make a list from the telephone book and
15 we would go from one to the another one. I would wait
16 in the car and she goes in.

17 And sometime she took a couple minutes and
18 walk out with cards, business cards. And that -- she
19 did the recruiting.

20 And from then, she pick up the girls and that
21 was the end of it. I never did any recruiting and I
22 never really saw him doing it.

23 Q. You really never saw?

24 A. Never saw Mr. Epstein recruiting anybody.

25 MS. EZELL: All right. I have no other

EXHIBIT 19

(Filed Under Seal)

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO:502008CA028051XXXXMB AB

L.M.

Plaintiff,

-VS-

JEFFREY EPSTEIN
AND SARAH KELLEN,

Defendants.

_____ /

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010
10:09 - 2:30 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting
Job No.: 1317

1 Q. What family was that?

2 A. It's, it was an older house in New York. I
3 worked there for seven years, no, five years before I
4 get the job in the Seagram company. So, I guess I had
5 some experience to continue.

6 Q. Do you remember the name of the family
7 that you worked with for seven years in New York?

8 A. Frank, Frank.

9 Q. His name is something Frank, F-r-a-n-k?

10 A. Yes.

11 Q. Do you remember the first name?

12 A. Fredrick.

13 Q. And were your duties as house manager for
14 Fredrick Frank similar to your duties as house
15 manager for Jeffrey Epstein?

16 A. Yes, yes.

17 Q. And when you started in 2005 when you
18 heard that there was a job position with Jeffrey
19 Epstein, did you interview for that position?

20 A. Yes.

21 Q. Who did you interview with?

22 A. First I got interviewed with Ghislaine
23 Maxwell.

24 Q. And that's G-h-i-s-l-a-i-n-e, Maxwell?

25 A. Right, right.

1 Q. Where did that interview take place?

2 A. In New York.

3 Q. And it was for the position as house
4 manager in the Palm Beach house, correct?

5 A. Right.

6 Q. That's at 358 Albrillo way?

7 A. Correct.

8 Q. Why were you interviewed in New York, if
9 you know?

10 A. Because at that time I was living in New York
11 with my friends and so --

12 Q. Where did the interview take place in New
13 York?

14 A. In her house on 65th Street.

15 Q. Whose house, do you know?

16 A. Ghislaine Maxwell.

17 Q. So, Ghislaine Maxwell interviewed you back
18 in 2005 at her house in New York for a position at
19 Jeffrey Epstein's house in Palm Beach?

20 A. Right.

21 Q. And what did the interview consist of?
22 What did she ask you?

23 A. She asked me basic questions, you know, what's
24 my previous employer, how long I work for them and
25 basically she was checking my resume.

1 Q. Okay. So, I assume then that your wife
2 that you are separated from I guess at the time, she
3 didn't come down to Palm Beach?

4 A. No, no.

5 Q. And this is somebody who still lives
6 somewhere other than Florida?

7 A. Correct.

8 Q. So, you came down in February 2005 and
9 began working. What did you, what did you first
10 start doing for Jeffrey Epstein?

11 A. First I doing? I don't remember nothing
12 special.

13 Q. Okay. Well, were you working -- I will
14 rephrase it. Were you working only for Jeffrey
15 Epstein or were you working also for Ghislaine
16 Maxwell, the other person who interviewed you, or
17 anybody else in the house?

18 A. I guess only for him because she was visiting
19 a few times house, but I am employed by him.

20 Q. Okay. What was your understanding at that
21 time as to the relationship between Ghislaine
22 Maxwell and Jeffrey Epstein?

23 A. They were like partners in business.

24 Q. Okay. What business was that, if you
25 know?

1 A. I don't know what kind of business but she was
2 the one who organized I would say employment with this
3 organization. So, whatever I need, if I have some kind
4 of problem, I contact her. She was the one who decided
5 what I have to answer my problems with, what I was
6 supposed to do.

7 Q. How many times did you have problems where
8 you had to go through her?

9 A. Well, not big problems. Just a question of
10 what certain, how to do certain things. For example,
11 what kind of flowers I have to buy, what kind of things
12 he likes, what time I supposed to serve him coffee in
13 the mornings, sort of organizing things.

14 Q. Those are things that you wouldn't ask
15 Jeffrey Epstein directly?

16 A. No, no. He doesn't like those things to ask
17 him directly. He would like to prefer either through
18 his assistant or like I say, Ghislaine Maxwell.

19 Q. Is that still the same today?

20 A. Yes, still the same. Unless, something happen
21 that I need to, nobody is around and I need to urgently
22 contact him, I go to him directly.

23 Q. So, for the most part if you have a
24 question or at least -- let's go back to 2005, you
25 had a question about what needed to be done in the

1 A. (Witness shakes head.)

2 Q. And I'm sorry.

3 A. No.

4 Q. I understood you when you shook your head.

5 A. I realize what you told me but I am sorry.

6 Q. I told you it was easy to forget.

7 Do you remember who it was that personally
8 removed the computers and equipment from the
9 property? Was it Mr. Epstein, was it a lawyer, was
10 it, do you remember?

11 A. It was Adriana.

12 Q. All right. And I am of the understanding
13 that there were several computers that were removed
14 from the house, correct?

15 MR. GOLDBERGER: Form.

16 THE WITNESS: Yes, three of them.

17 BY MR. EDWARDS:

18 Q. Three? And to your knowledge Adriana
19 removed all of them?

20 A. She show up one day with gentleman. I don't
21 remember his name. And she told me that they are moving
22 out those computers.

23 Q. And where were the computers? Which rooms
24 were the computers in that were removed by Adriana
25 and this gentleman you're describing?

CERTIFICATE OF OATH

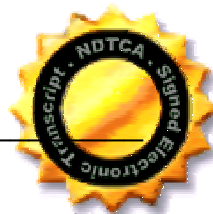
THE STATE OF FLORIDA

COUNTY OF PALM BEACH

I, the undersigned authority, certify that
JANUSZ BANASIAK personally appeared before me
and was duly sworn on the 16th day of February,
2010.

Dated this 28th day of February, 2010.

Cynthia J. Hopkins



Cynthia Hopkins, RPR, FPR
Notary Public - State of Florida
My Commission Expires: February 25, 2011
My Commission No.: DD 643788

C E R T I F I C A T E

THE STATE OF FLORIDA

COUNTY OF PALM BEACH

I, Cynthia Hopkins, Registered Professional Reporter, Florida Professional Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Dated this 28th day of February, 2010.


Cynthia Hopkins, RPR, FPR

EXHIBIT 20

(Filed Under Seal)

09 - 22783

Condensed Transcript

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

L.M.,

Plaintiff,

vs.

CASE No.
502008CA028051XXXXMB AB

JEFFREY EPSTEIN,

Defendant.
~~~~~

**DEPOSITION OF  
LOUELLA RABUYO**

**VOLUME I**

October, 20, 2009  
10:10 a.m.

515 N. Flagler Drive  
Suite 200-P  
West Palm Beach, Florida 33401

Reported By: Teresa Whalen, RPR, FPR, Notary Public, State of Florida



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Louella Rabuyo - Volume I

October 20, 2009

| <p style="text-align: center;">1</p> <p style="text-align: center;">IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT<br/>IN AND FOR PALM BEACH COUNTY, FLORIDA<br/>CIVIL DIVISION<br/>CASE No.502008CA028051XXXXMB AB</p> <p>L.M.,<br/>Plaintiff,<br/>-vs-<br/>JEFFREY EPSTEIN,<br/>Defendant.</p> <hr/> <p style="text-align: center;">DEPOSITION OF LOUELLA RABUYO<br/>VOLUME I</p> <p style="text-align: center;">Tuesday, October, 20, 2009<br/>10:10 - 3:30 p.m.</p> <p style="text-align: center;">515 N. Flagler Drive, Suite 200-P<br/>West Palm Beach, Florida 33401</p> <p>Reported By:<br/>Teresa Whalen, RPR, PDR<br/>Notary Public, State of Florida<br/>West Palm Beach Office Job #118991</p>                                                                                                                           | <p style="text-align: center;">3</p> <p>1 APPEARANCES:</p> <p>2 On behalf of the Defendant:</p> <p>3 ROBERT D. CRITTON, JR., ESQUIRE<br/>4 BURMAN CRITTON LUTTIER &amp; COLEMAN, LLP<br/>5 303 Banyan Boulevard, Suite 400<br/>6 West Palm Beach, Florida 33401<br/>7 Phone: 561.842.2820</p> <p>8 On behalf of Plaintiff L.M.:<br/>9 BRADLEY J. EDWARDS, ESQUIRE<br/>10 CARA L. HOLMES, ESQUIRE<br/>11 ROTHSTEIN ROSENFELDT ADLER<br/>12 401 E. Las Olas Boulevard, Suite 1650<br/>13 Fort Lauderdale, Florida 33394<br/>14 Phone: 954.522.3456</p> <p>15 On behalf of the Witness:<br/>16 BRUCE E. REINHART, ESQUIRE<br/>17 LAW OFFICE OF BRUCE E. REINHART<br/>18 250 S. Australian Avenue, Suite 1400<br/>19 West Palm Beach, Florida 33401<br/>20 Phone: 561.202.6360</p> <p>21 On behalf of Defendants/Jane Does 2 - 8:<br/>22 STUART S. MERMELSTEIN, ESQUIRE<br/>23 MERMELSTEIN &amp; HOROWITZ, P.A.<br/>24 18205 Biscayne Boulevard, Suite 2218<br/>25 Miami, Florida 33160<br/>Phone: 305.931.2200</p> <p>On behalf of Plaintiff in related Case No. 08-80811<br/>JACK HILL, ESQUIRE (Partially via speakerphone)<br/>SEARCY, DENNEY, SCAROLA, BARNHART &amp; SHIPLEY<br/>2139 Palm Beach Lakes Boulevard<br/>West Palm Beach, Florida 33409<br/>Phone: 561.686.6300</p> |        |             |      |    |                                                 |     |    |                                                |     |    |                                      |     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------|----|-------------------------------------------------|-----|----|------------------------------------------------|-----|----|--------------------------------------|-----|
| <p style="text-align: center;">2</p> <p>1 UNITED STATES DISTRICT COURT<br/>2 SOUTHERN DISTRICT OF FLORIDA</p> <p>3 CASE No.08-CV-80119-CIV-MARRA/JOHNSON</p> <p>4 JANE DOE NO. 2,<br/>5 Plaintiff,<br/>6 -vs-<br/>7 JEFFREY EPSTEIN,<br/>8 Defendant.</p> <hr/> <p>9 Related cases:<br/>10 08-80232, 08-80380, 98-80381, 08-80994,<br/>11 08-80993, 08-80811, 08-80893, 09-80469,<br/>12 09-80591, 09-80656, 09-80802, 09-81092</p> <hr/> <p>13 DEPOSITION OF LOUELLA RABUYO<br/>14 VOLUME I</p> <p>15 Tuesday, October 20, 2009<br/>16 10:10 - 3:30 p.m.</p> <p>17 515 N. Flagler Drive, Suite 200-P<br/>18 West Palm Beach, Florida 33401</p> <p>19 Reported By:<br/>20 Teresa Whalen, RPR, FPR<br/>21 Notary Public, State of Florida<br/>22 West Palm Beach Office Job #118991<br/>23 Phone: 800.330.6952<br/>24 561.659.4155<br/>25</p> | <p style="text-align: center;">4</p> <p>1 ---</p> <p>2 INDEX</p> <p>3 ---</p> <p>4</p> <p>5 WITNESS: DIRECT CROSS REDIRECT RECROSS</p> <p>6</p> <p>7 LOUELLA RABUYO</p> <p>8 BY MR. EDWARDS: 5 190</p> <p>9 BY MR. MERMELSTEIN: 135 208</p> <p>10 BY MR. HILL: 156</p> <p>11 BY MR. CRITTON: 173</p> <p>12</p> <p>13 ---</p> <p>14 EXHIBITS</p> <p>15 ---</p> <p>16</p> <table border="1"> <thead> <tr> <th>NUMBER</th> <th>DESCRIPTION</th> <th>PAGE</th> </tr> </thead> <tbody> <tr> <td>18</td> <td>DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS</td> <td>103</td> </tr> <tr> <td>19</td> <td>DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK</td> <td>147</td> </tr> <tr> <td>20</td> <td>DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH</td> <td>162</td> </tr> </tbody> </table> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                  | NUMBER | DESCRIPTION | PAGE | 18 | DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS | 103 | 19 | DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK | 147 | 20 | DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH | 162 |
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| 18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 103    |             |      |    |                                                 |     |    |                                                |     |    |                                      |     |
| 19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 147    |             |      |    |                                                 |     |    |                                                |     |    |                                      |     |
| 20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 162    |             |      |    |                                                 |     |    |                                                |     |    |                                      |     |



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GIUFFRE004388



Louella Rabuyo - Volume I

October 20, 2009

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1 A When I came back to report, that's how I  
2 learned.  
3 Q Elaborate on that for me. What do you mean,  
4 when you came back to report that's how I learned?  
5 A I reported in the afternoon, and then that's  
6 how I learned that the police came.  
7 Q All right. And when were you -- you're now  
8 saying you came back to report and you learned that the  
9 police had already come to the house, right?  
10 A Yes, sir.  
11 Q Prior to that occasion, when was the previous  
12 time that you were at the house?  
13 A The day before.  
14 Q Okay. And the day before you left your shift  
15 at roughly five o'clock?  
16 A I cannot remember. I usually leave 5:00 or  
17 5:30.  
18 Q But sometime late in the afternoon?  
19 A Yes.  
20 Q And as of that time, the day before the search  
21 warrant was issued, you had seen no police officers in  
22 or around the house?  
23 A No.  
24 Q And then the next day you reported to the job  
25 at what time?

82

1 A The next day?  
2 Q The next day.  
3 A I report in the afternoon.  
4 Q Was there a reason why you reported in the  
5 afternoon?  
6 A Ms. Maxwell called me.  
7 Q When did she call you?  
8 A During that day, she said Louella, you can  
9 report in the afternoon.  
10 Q She called you early in the morning?  
11 A Not early.  
12 Q Normally you would report to the house between  
13 eight and nine o'clock, right?  
14 A Yes, sir.  
15 Q So in order for you not to arrive at the  
16 house, she had to have called you before eight or  
17 nine o'clock, right?  
18 A Yes.  
19 Q Okay. So approximately what time does  
20 Ms. Maxwell call you to tell you you can report to the  
21 house later on that day?  
22 A I cannot remember really the time.  
23 Q Okay. What time did you actually report to  
24 the house?  
25 A After lunch, about -- maybe after lunch.

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1 Q So are we talking about the day the police  
2 went to Jeffrey Epstein's house you did not go in the  
3 morning, but you went after lunch and the police had  
4 already left?  
5 A Oh. No. When I went there nobody was there,  
6 no policemen were around.  
7 Q Who was at the house then?  
8 A Janusz, and Douglas, the architect.  
9 Q Schoettle?  
10 A Yes.  
11 Q And did you have a discussion with them?  
12 A No.  
13 Q How did you know the police had been to the  
14 house?  
15 A Janusz told me.  
16 Q When?  
17 A When I arrive.  
18 Q That's what I was asking you when I said did  
19 you have a discussion with them, meaning Janusz and  
20 Douglas.  
21 A Okay. Being because them -- with Janusz only.  
22 Q What did he say?  
23 A He said the police came and, what's this, took  
24 away some stuff.  
25 Q Did he say what they took?

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1 A He said pictures.  
2 Q Did he tell you which pictures?  
3 A No, sir.  
4 Q Aside from pictures, what else did the police  
5 take, as Janusz told you?  
6 A He did not elaborate.  
7 Q All right. Prior to the police going to the  
8 house and taking pictures, do you remember seeing  
9 pictures around Mr. Epstein's house?  
10 A Yes.  
11 Q Do you remember seeing pictures of naked or  
12 nude females around Mr. Epstein's house?  
13 A Not around, in his closet.  
14 Q In Mr. Epstein's closet you would see --  
15 describe what you would see related to females in  
16 pictures.  
17 A Some have topless.  
18 Q Is this a big closet?  
19 A No. Not really big, it's just this big, not  
20 so big.  
21 Q Okay. Were these pictures that could be seen  
22 by -- strike that.  
23 Do you know of any other pictures of females  
24 that were confiscated by the police that did not come  
25 from Mr. Epstein's closet?



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GIUFFRE004408

Louella Rabuyo - Volume I

October 20, 2009

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1 STATE OF FLORIDA  
2 COUNTY OF PALM BEACH

3  
4  
5 I, the undersigned authority, certify that  
6 LOUELLA RABUYO personally appeared before me on the 20th  
7 of October, 2009, and was duly sworn.

8  
9 Dated this 30th day of October, 2009.

10  
11  
12  
13  
14  
15 Teresa Whalen, RPR, FPR  
16 Notary Public - State of Florida  
17 My Commission Expires: 4/25/11  
18 My Commission No.: DD 644533  
19 Job # 118991  
20  
21  
22  
23  
24  
25

130

1 CERTIFICATE  
2 STATE OF FLORIDA  
3 COUNTY OF PALM BEACH

4  
5 I, Teresa Whalen, Registered Professional  
6 Reporter and Notary Public in and for the State of  
7 Florida at Large, do hereby certify that the  
8 aforementioned witness was by me first duly sworn to  
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22 action.

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24 does not apply to any reproduction of the same by any  
25 means unless under the direct control and/or direction  
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Dated this 30th day of October, 2009.

\_\_\_\_\_  
Teresa Whalen, RPR, FPR  
Job # 118991



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GIUFFRE004420

# EXHIBIT 21

## (Filed Under Seal)

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, Case No: 08-CV-80119  
4 Plaintiff,  
5 Vs  
6 JEFFREY EPSTEIN,  
7 Defendant.  
\_\_\_\_\_ /

8 JANE DOE NO. 3, Case NO: 08-CV-80232  
9 Plaintiff,  
10 Vs  
11 JEFFREY EPSTEIN,  
12 Defendant.  
\_\_\_\_\_ /

13 JANE DOE NO. 4, Case No: 08-CV-80380  
14 Plaintiff,  
15 Vs.  
16 JEFFREY EPSTEIN,  
17 Defendant.  
\_\_\_\_\_ /

18 JANE DOE NO. 5, Case No: 08-CV-80381  
19 Plaintiff,  
20 \_\_\_\_\_ /

21 Vs  
22 JEFFREY EPSTEIN,  
23 Defendant.  
\_\_\_\_\_ /

24  
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| <p style="text-align: right;">Page 2</p> <p>1 JANE DOE NO. 6, Case No: 08-CV-80994<br/> 2 Plaintiff,<br/> 3 Vs<br/> 4 JEFFREY EPSTEIN,<br/> 5 Defendant.<br/> 6<br/> 7 JANE DOE NO. 7, Case No. 08-CV-80993<br/> 8 Plaintiff,<br/> 9 Vs<br/> 10 JEFFREY EPSTEIN,<br/> 11 Defendant.<br/> 12 C.M.A., Case No: 08-CV-80811<br/> 13 Plaintiff,<br/> 14 Vs<br/> 15 JEFFREY EPSTEIN,<br/> 16 Defendant.<br/> 17<br/> 18 JANE DOE, Case No: 08-CV-80893<br/> 19 Plaintiff,<br/> 20 Vs<br/> 21 JEFFREY EPSTEIN,<br/> 22 Defendant.<br/> 23<br/> 24<br/> 25</p> | <p style="text-align: right;">Page 4</p> <p>1 VIDEOTAPED<br/> 2 DEPOSITION<br/> 3 of<br/> 4 ALFREDO RODRIGUEZ<br/> 5<br/> 6 taken on behalf of the Plaintiffs pursuant<br/> 7 to a Re-Notice of Taking Deposition (Duces Tecum)<br/> 8<br/> 9 ---<br/> 10 APPEARANCES:<br/> 11<br/> 12 MERMELSTEIN &amp; HOROWITZ, P.A.<br/> 13 BY: STUART MERMELSTEIN, ESQ.<br/> 14 18205 Biscayne Boulevard<br/> 15 Suite 2218<br/> 16 Miami, Florida 33160<br/> 17 Attorney for Jane Doe 2, 3, 4, 5,<br/> 18 6, and 7.<br/> 19<br/> 20 ROTHSTEIN ROSENFELDT ADLER<br/> 21 BY: BRAD J. EDWARDS, ESQ., and<br/> 22 CARA HOLMES, ESQ.<br/> 23 Las Olas City Centre<br/> 24 Suite 1650<br/> 25 401 East Las Olas Boulevard<br/> Fort Lauderdale, Florida 33301<br/> Attorney for Jane Doe and E.W.<br/> And L.M.<br/> <br/> PODHURST ORSECK<br/> BY: KATHERINE W. EZELL<br/> 25 West Flagler Street<br/> Suite 800<br/> Miami, Florida 33130<br/> Attorney for Jane Doe 101 and 102.</p> |
| <p style="text-align: right;">Page 3</p> <p>1 JANE DOE NO. II, Case No: 08-CV-80469<br/> 2 Plaintiff,<br/> 3 Vs<br/> 4 JEFFREY EPSTEIN,<br/> 5 Defendant.<br/> 6<br/> 7 JANE DOE NO. 101, Case No: 09-CV-80591<br/> 8 Plaintiff,<br/> 9 Vs<br/> 10 JEFFREY EPSTEIN,<br/> 11 Defendant.<br/> 12 JANE DOE NO. 102, Case No: 09-CV-80656<br/> 13 Plaintiff,<br/> 14 Vs<br/> 15 JEFFREY EPSTEIN,<br/> 16 Defendant.</p>                                                                                                                                     | <p style="text-align: right;">Page 5</p> <p>1 APPEARANCES:<br/> 2<br/> 3 LEOPOLD-KUVIN<br/> 4 ADAM J. LANGINO, ESQ.<br/> 5 2925 PGA Boulevard<br/> 6 Suite 200<br/> 7 Palm Beach Gardens, Florida 33410<br/> 8 Attorney for B.B.<br/> 9<br/> 10 RICHARD WILLITS, ESQ.<br/> 11 2290 10th Avenue North<br/> 12 Suite 404<br/> 13 Lake Worth, Florida 33461<br/> 14 Attorney for C.M.A.<br/> 15<br/> 16 BURMAN, CRITTON, LUTTIER &amp;<br/> 17 COLEMAN, LLP<br/> 18 BY: ROBERT CRITTON, ESQ.<br/> 19 515 North Flagler Drive<br/> 20 Suite 400<br/> 21 West Palm Beach, Florida 33401<br/> 22 Attorney for Jeffrey Epstein.</p>                                                                                                                                                                                                                                                                                                                                            |
| <p>17<br/> 18<br/> 19<br/> 20 1031 Ives Dairy Road<br/> 21 Suite 228<br/> 22 North Miami, Florida<br/> 23 July 29, 2009<br/> 24 11:00 a.m. to 5:30 p.m.<br/> 25</p>                                                                                                                                                                                                                                                                                                                                                                                     | <p>16 ALSO PRESENT:<br/> 17<br/> 18 JOE LANGSAM, VIDEOGRAPHER<br/> 19<br/> 20 ---<br/> 21<br/> 22<br/> 23<br/> 24<br/> 25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

2 (Pages 2 to 5)

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| <p style="text-align: right;">Page 6</p> <p>1 INDEX OF EXAMINATION</p> <p>2 WITNESS DIRECT CROSS</p> <p>3 ALFREDO RODRIGUEZ</p> <p>4 (By Mr. Mermelstein) 12</p> <p>5 (By Mr. Edwards) 157</p> <p>6 (By Mr. Langino) 260</p> <p>7</p> <p>8</p> <p>9</p> <p>10 INDEX OF EXHIBITS</p> <p>11 EXHIBITS PAGE</p> <p>12 1 Message pad 72</p> <p>13 2 Documents 115</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p style="text-align: right;">Page 8</p> <p>1 Doe right here on the copy you gave me. I'm</p> <p>2 missing which Jane Doe this is.</p> <p>3 They're all different case numbers. Do</p> <p>4 you want me to go through each case number?</p> <p>5 MR. CRITTON: I'm going to note my</p> <p>6 objection. Obviously if this deposition</p> <p>7 gets played -- not obviously, I'm going to</p> <p>8 object to the litany of each one so I don't</p> <p>9 know how we can separate it out. Maybe if</p> <p>10 and when at the time of trial and depending</p> <p>11 on how the Court determines what comes in</p> <p>12 and what doesn't with regard to the</p> <p>13 consolidated aspects of this. I have no</p> <p>14 great idea other than just saying Jane Doe</p> <p>15 versus Epstein, et al, or something like</p> <p>16 that, or Jane Doe, et al.</p> <p>17 MS. EZELL: Couldn't we just say and</p> <p>18 those cases which have been consolidated</p> <p>19 with it for Discovery purposes?</p> <p>20 MR. EDWARDS: Although there is cases</p> <p>21 here that have cross noticed this from state</p> <p>22 court that haven't been consolidated so that</p> <p>23 may not work. You may have to read them</p> <p>24 all, if it works out your way that will just</p> <p>25 get edited out, at least he will have read</p> |
| <p style="text-align: right;">Page 7</p> <p>1 Deposition taken before MICHELLE PAYNE, Court</p> <p>2 Reporter and Notary Public in and for the State of</p> <p>3 Florida at Large, in the above cause.</p> <p>4 - - -</p> <p>5 THE VIDEOGRAPHER: This is the case of</p> <p>6 Jane Doe No. 2, plaintiff, versus Jeffrey</p> <p>7 Epstein, defendant. Jane Doe No. 3,</p> <p>8 plaintiff, versus Jeffrey Epstein,</p> <p>9 defendant. Jane Doe No. 4, plaintiff,</p> <p>10 versus Jeffrey Epstein, defendant. And Jane</p> <p>11 Doe No. 5, plaintiff, versus Jeffrey</p> <p>12 Epstein, defendant. Jane Doe No. 6,</p> <p>13 plaintiff, versus Jeffrey Epstein,</p> <p>14 defendant. Jane Doe No. 7, plaintiff,</p> <p>15 versus Jeffrey Epstein, defendant. CMA,</p> <p>16 plaintiff, versus Jeffrey Epstein,</p> <p>17 defendant. And Jane Doe, plaintiff, versus</p> <p>18 Jeffrey Epstein, et al, defendant. And Jane</p> <p>19 Doe -- is there a shorter thing that we can</p> <p>20 do here? It's also missing this one right</p> <p>21 here.</p> <p>22 MR. MERMELSTEIN: Do we have a problem</p> <p>23 with saying Jane Doe 2 and the Epstein and</p> <p>24 related cases?</p> <p>25 THE VIDEOGRAPHER: I'm missing this Jane</p> | <p style="text-align: right;">Page 9</p> <p>1 that caption, every caption. Right? Is</p> <p>2 there a better suggestion?</p> <p>3 MR. CRITTON: No. There may be a better</p> <p>4 suggestion if he starts this is such and</p> <p>5 such day, it's the deposition of Mr.</p> <p>6 Rodriguez in the case such and such, and we</p> <p>7 can almost fill it in depending on which</p> <p>8 tape it goes, how it fills in, at least</p> <p>9 we'll have the context of the first and</p> <p>10 depending on whether the Judge reads it in</p> <p>11 from a consolidated or they all come</p> <p>12 related, I have no great idea.</p> <p>13 MR. EDWARDS: I was thinking if he read</p> <p>14 every one of them and it was the seventh in</p> <p>15 line then you just would edit it so you</p> <p>16 would only read that one.</p> <p>17 MR. CRITTON: I'm okay with that too.</p> <p>18 THE VIDEOGRAPHER: On page number three</p> <p>19 there is something missing on the top here.</p> <p>20 Do you want me to read each case number</p> <p>21 separately?</p> <p>22 MR. MERMELSTEIN: I don't think it's</p> <p>23 necessary.</p> <p>24 MR. EDWARDS: I don't think it's</p> <p>25 necessary either.</p>                                                                                                                          |

3 (Pages 6 to 9)



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| <p style="text-align: right;">Page 26</p> <p>1 with a copy.<br/> 2 Q. Were you the only one who was allowed to<br/> 3 answer the phone?<br/> 4 A. Yes.<br/> 5 Q. I'm sorry, what would you do --<br/> 6 A. I would leave it on the counter next to<br/> 7 the kitchen so when I find that piece all crumbled<br/> 8 I knew that Mr. Epstein saw the message, so we<br/> 9 communicated like that.<br/> 10 Q. Now, you mentioned Mr. Epstein would give<br/> 11 you instructions during the course of the day.<br/> 12 A. Through his assistant.<br/> 13 Q. And his assistant was whom?<br/> 14 A. Sarah Kellen.<br/> 15 Q. But you didn't view her as your<br/> 16 supervisor?<br/> 17 A. She take orders from Mrs. Maxwell but she<br/> 18 will tell me, Alfredo, we need to buy this, we<br/> 19 need to do this, and so and so was coming. I<br/> 20 couldn't talk directly to Mr. Epstein.<br/> 21 Q. Okay. So any communications from Mr.<br/> 22 Epstein always came through Ms. Kellen?<br/> 23 A. Or from the office in New York. Lesley,<br/> 24 his secretary, or somebody else, the comptroller,<br/> 25 the architect, any lawyer.</p> | <p style="text-align: right;">Page 28</p> <p>1 A. Yes. Sometimes very short notice but,<br/> 2 yes, I was.<br/> 3 Q. So that varied?<br/> 4 A. Yes.<br/> 5 Q. Who would give you that notice?<br/> 6 A. Mrs. Maxwell or Sarah or Larry, the<br/> 7 pilot.<br/> 8 Q. And then you would drive to pick them up<br/> 9 at the airport?<br/> 10 A. Yes.<br/> 11 Q. And who traveled with him?<br/> 12 A. The three pilots and some guests.<br/> 13 Q. What do you mean by guests?<br/> 14 A. He will have some friends from Harvard,<br/> 15 he will have -- well, very important people that,<br/> 16 you know, friends, acquaintances from New York or<br/> 17 Europe because I was just told the number of<br/> 18 people was coming on the plane.<br/> 19 Q. Were there people who were employed by<br/> 20 him who came regularly?<br/> 21 A. Yes.<br/> 22 Q. And who would they be?<br/> 23 A. Like I said, they were the pilots, Larry<br/> 24 Bisosky, George, and I don't remember the flight<br/> 25 engineer, and he will have two girlfriends.</p> |
| <p style="text-align: right;">Page 27</p> <p>1 Q. Lawyer, what kind of instructions would<br/> 2 you get from lawyers?<br/> 3 A. We used to have a lot of time, for<br/> 4 instance, the dock construction, you need to have<br/> 5 a lot of permits in Palm Beach so they were there<br/> 6 for that reason.<br/> 7 Q. Okay. Now, so you would interact with<br/> 8 the staff from New York and that would include I<br/> 9 think you said Lesley?<br/> 10 A. Lesley, Bella.<br/> 11 Q. What was Lesley's position?<br/> 12 A. Lesley is the secretary, secretary to Mr.<br/> 13 Epstein.<br/> 14 Q. Okay. Is that Lesley Groff?<br/> 15 A. I believe it was, I don't remember the<br/> 16 last name.<br/> 17 Q. Bella, who was Bella?<br/> 18 A. Bella was the assistant comptroller.<br/> 19 Q. Anyone else that you dealt with in New<br/> 20 York?<br/> 21 A. Doug Shadow was the architect and he used<br/> 22 to come to the house in a regular basis because we<br/> 23 used to have a lot of projects going on.<br/> 24 Q. Okay. Would you get advance notice when<br/> 25 Mr. Epstein was going to arrive in Palm Beach?</p>             | <p style="text-align: right;">Page 29</p> <p>1 Q. The pilot would have two girlfriends?<br/> 2 A. Mr. Epstein. This is all people coming<br/> 3 in the plane together.<br/> 4 Q. Right. What do you mean by girlfriends?<br/> 5 A. Friends, you know, that he was always<br/> 6 having friends that he will befriend in New York,<br/> 7 I don't know, or some other places.<br/> 8 But I was just told -- my concern was how<br/> 9 many people I have to feed, how many cars do I<br/> 10 need to transport these people from the airport to<br/> 11 the house, and to arrange accommodations in the<br/> 12 house.<br/> 13 Q. What about Sarah Kellen, did she travel<br/> 14 with him?<br/> 15 A. Yes.<br/> 16 Q. So she was on the plane?<br/> 17 A. Yes.<br/> 18 MR. CRITTON: Form.<br/> 19 BY MR. MERMELSTEIN:<br/> 20 Q. And Ms. Maxwell?<br/> 21 MR. CRITTON: Form.<br/> 22 THE WITNESS: No, she will have different<br/> 23 plane.<br/> 24 BY MR. MERMELSTEIN:<br/> 25 Q. Okay.</p>                                                              |

8 (Pages 26 to 29)

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| <p style="text-align: right;">Page 70</p> <p>1 in cash as opposed to check?<br/> 2 MR. CRITTON: Form.<br/> 3 THE WITNESS: I was told to pay them<br/> 4 cash, sir.<br/> 5 BY MR. MERMELSTEIN:<br/> 6 Q. Simply you were told and didn't ask why?<br/> 7 A. No.<br/> 8 Q. Do you recall telling the detective who<br/> 9 interviewed you for the police that you thought of<br/> 10 yourself as a human ATM machine?<br/> 11 MR. CRITTON: Form.<br/> 12 THE WITNESS: Yes.<br/> 13 BY MR. MERMELSTEIN:<br/> 14 Q. You recall saying that?<br/> 15 MR. CRITTON: Form.<br/> 16 THE WITNESS: Because I always had cash<br/> 17 in my pocket.<br/> 18 BY MR. MERMELSTEIN:<br/> 19 Q. And why was there always cash in your<br/> 20 pocket?<br/> 21 A. That was part of my job to have, you<br/> 22 know, for emergencies or paying somebody cash.<br/> 23 Q. Okay. What kind of emergencies?<br/> 24 A. It's hard to say. I was supposed to put<br/> 25 cash on each Mercedes Benz on each ashtray. The</p>                                                                                                                                               | <p style="text-align: right;">Page 72</p> <p>1 A. Not him. I will drive anybody else but<br/> 2 he would rather eat at home.<br/> 3 Q. So you would drive house guests to<br/> 4 restaurants?<br/> 5 A. Yes.<br/> 6 Q. And when you did that you would -- didn't<br/> 7 you stay with the car or did you eat with them?<br/> 8 A. No, I will stay with the car.<br/> 9 Q. So who did you tip?<br/> 10 A. If you want to park in front of the<br/> 11 restaurant you got to tip the valet otherwise<br/> 12 you're taking one of the spots.<br/> 13 Sometimes I used to take -- I'm sorry.<br/> 14 Aviation, you know, you need to go to aviation and<br/> 15 help those guys move your cars around, you need --<br/> 16 they carry luggage, so I used to tip those too.<br/> 17 Q. That would be when you picked up or<br/> 18 dropped off Mr. Epstein. Correct?<br/> 19 A. Yes.<br/> 20 MR. MERMELSTEIN: We'll mark this as an<br/> 21 exhibit, composite exhibit.<br/> 22 (Composite Exhibit 1 was marked for<br/> 23 Identification.)<br/> 24 MR. CRITTON: Just out of curiosity, on<br/> 25 depositions are we going to use instead of</p>                                                       |
| <p style="text-align: right;">Page 71</p> <p>1 idea behind this is you get stranded nobody accept<br/> 2 credit card or check you have cash.<br/> 3 Q. How much did you leave in the ashtray?<br/> 4 A. 300.<br/> 5 Q. And did you ever have to replenish that<br/> 6 money?<br/> 7 A. Yes.<br/> 8 Q. Because the Mercedes was stranded?<br/> 9 A. No, because when Mr. Epstein will leave I<br/> 10 have to collect that money because I will send the<br/> 11 cars to the car wash so to avoid that money being<br/> 12 stolen we used to keep track, you know, when to<br/> 13 retrieve that money and then when he's coming put<br/> 14 it back there again.<br/> 15 Q. So you use cash for that purpose and you<br/> 16 also use cash to pay the masseuses. Correct?<br/> 17 A. Yes.<br/> 18 Q. Did you use cash for any other purpose?<br/> 19 A. Car wash for the guy who used to come to<br/> 20 the house and wash all the cars. Tipping<br/> 21 sometimes for getting a good spot in the<br/> 22 restaurant you have to have cash, something like<br/> 23 that.<br/> 24 Q. Okay. Would you drive Mr. Epstein to a<br/> 25 restaurant?</p> | <p style="text-align: right;">Page 73</p> <p>1 doing plaintiff and defendant designations<br/> 2 do you just want to run them one, two,<br/> 3 three, four?<br/> 4 MR. MERMELSTEIN: That's fine with me as<br/> 5 long as we remember where we left off.<br/> 6 MR. CRITTON: Well, are we going to do it<br/> 7 consecutive with all of the depositions?<br/> 8 I'm okay with that if someone can keep track<br/> 9 of that.<br/> 10 MR. EDWARDS: I've had that go wrong<br/> 11 before, especially when we have some parties<br/> 12 who aren't here, such as Mr. Garcia, he's<br/> 13 going to join depositions, we have to start<br/> 14 at 27 or whatever.<br/> 15 MR. CRITTON: For each deposition one<br/> 16 through whatever without necessarily giving<br/> 17 them a plaintiff or defendant.<br/> 18 BY MR. MERMELSTEIN:<br/> 19 Q. Mr. Rodriguez, I've marked as Exhibit 1 a<br/> 20 composite document which includes four per page of<br/> 21 what appear to be message slips.<br/> 22 First of all let me ask you, let me<br/> 23 direct your attention to the first page of this<br/> 24 exhibit. And the upper left message has initials<br/> 25 at the bottom. Is that correct?</p> |

19 (Pages 70 to 73)



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| <p style="text-align: right;">Page 74</p> <p>1 A. Yes.</p> <p>2 Q. Are those your initials?</p> <p>3 A. Yes.</p> <p>4 Q. And was it the household policy to</p> <p>5 initial messages when they were taken?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. You were instructed to do that?</p> <p>8 A. Yes.</p> <p>9 Q. Who instructed you to do that?</p> <p>10 A. Ms. Maxwell. There was a manual, sir, in</p> <p>11 the house, we had to follow the instructions of</p> <p>12 the manual.</p> <p>13 Q. There was -- okay.</p> <p>14 A. Estate manager, household manager for all</p> <p>15 the houses, so I will abide to that, you know, so</p> <p>16 I take message with my initial, the time, who</p> <p>17 called.</p> <p>18 Q. So there were all sorts of policies and</p> <p>19 procedures in this manual?</p> <p>20 A. Yes.</p> <p>21 Q. Who wrote it?</p> <p>22 A. It was the estate manager for all the</p> <p>23 properties and so I was --</p> <p>24 Q. Who was the estate manager for all the</p> <p>25 properties?</p>                    | <p style="text-align: right;">Page 76</p> <p>1 and he told you he owned a modeling agency?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Anything else he told you?</p> <p>4 A. He spoke, you know, five, six languages,</p> <p>5 always speaking Spanish, Italian.</p> <p>6 Q. Did the girls who were -- you know, who</p> <p>7 travelled with Mr. Epstein, were they from his</p> <p>8 agency?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: I don't know, sir.</p> <p>11 BY MR. MERMELSTEIN:</p> <p>12 Q. You didn't discuss that?</p> <p>13 A. No.</p> <p>14 Q. Let's look at the message next to it.</p> <p>15 MR. CRITTON: Still on page one?</p> <p>16 MR. MERMELSTEIN: Still on page one.</p> <p>17 BY MR. MERMELSTEIN:</p> <p>18 Q. It appears the one under it is to the</p> <p>19 same person. Is that correct? Who is that?</p> <p>20 A. Alicia.</p> <p>21 Q. Who is Alicia?</p> <p>22 A. I don't know, sir. Please tell Jeffrey</p> <p>23 that I called so I just wrote the name.</p> <p>24 Q. Now, some of these messages if you look</p> <p>25 through appears to be a different handwriting and</p>          |
| <p style="text-align: right;">Page 75</p> <p>1 A. I never met him, sir, he was fired before</p> <p>2 I came along.</p> <p>3 Q. But you don't remember his name?</p> <p>4 A. No, sir.</p> <p>5 Q. And you remember one of the things that</p> <p>6 said in this manual was that every message has to</p> <p>7 be signed?</p> <p>8 A. Yes.</p> <p>9 Q. I'm not necessarily going to go through</p> <p>10 every single message. Let me go back to the one</p> <p>11 on the upper left on the first page. It's from</p> <p>12 Jean-Luc. Is that correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Who is Jean-Luc?</p> <p>15 A. He had modeling agency.</p> <p>16 Q. How do you know that?</p> <p>17 A. He gave me his card, sir.</p> <p>18 Q. Was he a frequent guest at the house?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Did he stay over?</p> <p>21 A. Sometimes he will stay, sometimes I will</p> <p>22 drive him to Miami.</p> <p>23 Q. Do you recall his last name?</p> <p>24 A. No, sir.</p> <p>25 Q. And so you had a conversation with him</p> | <p style="text-align: right;">Page 77</p> <p>1 there is no signature on the bottom.</p> <p>2 A. That's not mine, I don't know who's that</p> <p>3 is, sir.</p> <p>4 Q. I thought you said earlier you were the</p> <p>5 one who was responsible for taking messages.</p> <p>6 A. Exactly, yes, I was, sir.</p> <p>7 Q. But there were other people who took</p> <p>8 messages as well?</p> <p>9 A. Maybe this is after or before my time,</p> <p>10 sir.</p> <p>11 Q. Okay. Because there is no date on it.</p> <p>12 A. I used to put my dates and I know I used</p> <p>13 to do that all the time, but you know.</p> <p>14 Q. These style of message pads. It was a</p> <p>15 pad. Correct?</p> <p>16 A. Yes.</p> <p>17 Q. And this is the old fashion message pad</p> <p>18 that it's like duplicate?</p> <p>19 A. Exactly, the original stays with the</p> <p>20 spiral.</p> <p>21 Q. Okay. So there was a spiral notebook?</p> <p>22 A. Exactly.</p> <p>23 Q. And you would write the message on the</p> <p>24 top copy and then you would take that out and put</p> <p>25 it on the counter in the kitchen?</p> |

20 (Pages 74 to 77)

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| <p style="text-align: right;">Page 150</p> <p>1 Q. You had a laptop?</p> <p>2 A. No, it was desktop.</p> <p>3 Q. Okay. So you had your own desktop in the</p> <p>4 staff house?</p> <p>5 A. Yeah. Exactly.</p> <p>6 Q. And you don't know what was -- what was</p> <p>7 the files in that computer versus on the other</p> <p>8 computers?</p> <p>9 A. No, sir.</p> <p>10 Q. Did you ever see any pornography on any</p> <p>11 of the computers?</p> <p>12 A. No, sir.</p> <p>13 Q. Are you sure about that?</p> <p>14 A. Pornography as in sexual acts, no.</p> <p>15 Q. Pornography as in naked people, men or</p> <p>16 women.</p> <p>17 A. Yeah, there were some.</p> <p>18 Q. Okay. And describe to me what that was.</p> <p>19 A. They were like models.</p> <p>20 Q. And where were those in the computer? I</p> <p>21 mean, how did you access that?</p> <p>22 A. They were in the files and some of it</p> <p>23 in -- you mean which file they were, what was your</p> <p>24 question?</p> <p>25 Q. Where were they in the computer? There</p>                   | <p style="text-align: right;">Page 152</p> <p>1 Q. The girls who came to the house for</p> <p>2 massages, did you ever call a cab to bring any of</p> <p>3 the girls home?</p> <p>4 A. Probably on a few occasions.</p> <p>5 Q. So is it your understanding that they</p> <p>6 would have arrived by cab as well?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. MERMELSTEIN:</p> <p>10 Q. And how would that come about, were you</p> <p>11 given instructions to call a cab by anyone?</p> <p>12 A. No, I would call the cab, the taxi.</p> <p>13 Q. How did you know a cab needed to be</p> <p>14 called?</p> <p>15 A. Because Sarah would tell me can you get</p> <p>16 me a taxi.</p> <p>17 Q. So when the girl was finished what she</p> <p>18 was doing Sarah would come to you and say --</p> <p>19 A. She would call me.</p> <p>20 MR. CRITTON: Form.</p> <p>21 BY MR. MERMELSTEIN:</p> <p>22 Q. She would call you?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. You would be in the guest house at</p> <p>25 the time?</p> |
| <p style="text-align: right;">Page 151</p> <p>1 were downloaded files on computer?</p> <p>2 A. They were downloaded, yes.</p> <p>3 MR. CRITTON: Form.</p> <p>4 BY MR. MERMELSTEIN:</p> <p>5 Q. Okay. There were photographs of naked</p> <p>6 women?</p> <p>7 A. Models.</p> <p>8 Q. And why do you say models?</p> <p>9 A. Because it was like a catalog so you have</p> <p>10 models, you know.</p> <p>11 Q. And what was your understanding as a</p> <p>12 source of these photos?</p> <p>13 A. I don't know, sir. It was just a</p> <p>14 curiosity on myself and it was -- it was none of</p> <p>15 my business but, you know, I just happen to see</p> <p>16 them there.</p> <p>17 Q. Did these girls appear very young to you?</p> <p>18 MR. CRITTON: Form.</p> <p>19 THE WITNESS: No, sir. They were young</p> <p>20 but not underage.</p> <p>21 BY MR. MERMELSTEIN:</p> <p>22 Q. Is there anything in particular that</p> <p>23 makes you draw that conclusion?</p> <p>24 A. Because they are developed, you know.</p> <p>25 It's hard to say, sir, you know.</p> | <p style="text-align: right;">Page 153</p> <p>1 A. Yes.</p> <p>2 Q. Do you recall having to do that often?</p> <p>3 A. No, not very often, sir.</p> <p>4 Q. Did Mr. Epstein keep photograph equipment</p> <p>5 in the house?</p> <p>6 A. I don't remember seeing it.</p> <p>7 Q. Do you recall seeing any video equipment?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you recall any video or photograph</p> <p>10 equipment in the master bedroom?</p> <p>11 A. No, sir.</p> <p>12 Q. The models that you saw on the computer,</p> <p>13 did you recognize any of them as having been at</p> <p>14 the house?</p> <p>15 A. No.</p> <p>16 Q. The girls who stayed at the house, did</p> <p>17 any of them speak with a foreign accent?</p> <p>18 A. Yes.</p> <p>19 Q. Many of them?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Some of them.</p> <p>22 BY MR. MERMELSTEIN:</p> <p>23 Q. Would any of them not speak any English?</p> <p>24 A. No.</p> <p>25 Q. They all spoke English?</p>                                                          |

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| <p style="text-align: right;">Page 166</p> <p>1 written down anywhere?</p> <p>2 A. No.</p> <p>3 Q. It's my understanding that C. and T.</p> <p>4 either came to his house alone to visit with Mr.</p> <p>5 Epstein or brought other girls in their age group</p> <p>6 to Mr. Epstein.</p> <p>7 Were you familiar with that type of</p> <p>8 recruitment process of girls bringing other girls?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. Can you tell me more about what you know</p> <p>13 about girls bringing other girls that are</p> <p>14 relatively the same age to come to Jeffrey</p> <p>15 Epstein's house and to use your words, have a good</p> <p>16 time?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: It's hard to know who they</p> <p>19 knew. But I think that was -- they feel</p> <p>20 better themselves when they're in a group</p> <p>21 than going by themselves, but I don't know</p> <p>22 somebody recruiting.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. Okay. And you've talked about, at least</p> <p>25 referred to yourself I believe to the police and</p>       | <p style="text-align: right;">Page 168</p> <p>1 for now we'll call it a massage -- as well as</p> <p>2 anybody who brought that person over to the house,</p> <p>3 they would both get paid cash. Are you familiar</p> <p>4 with that?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. If C. brought another girl over to the</p> <p>9 house and C. stayed downstairs but this other girl</p> <p>10 went upstairs with Mr. Epstein, which one would</p> <p>11 you pay?</p> <p>12 A. I don't know because I was told who to</p> <p>13 pay.</p> <p>14 Q. And Sarah Kellen always told you?</p> <p>15 A. Sarah told me pay so and so.</p> <p>16 Q. So if we were going to ask anybody else</p> <p>17 about the exact method in terms of who would get</p> <p>18 paid and for what, who would the people be? I</p> <p>19 mean, other than Mr. Epstein who else could we ask</p> <p>20 these questions?</p> <p>21 A. Sarah.</p> <p>22 Q. Sarah Kellen?</p> <p>23 A. Yes.</p> <p>24 Q. She would know this?</p> <p>25 A. Yes.</p>                      |
| <p style="text-align: right;">Page 167</p> <p>1 as well today as a human ATM machine. Right?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Something like that. I was</p> <p>4 supposed to carry cash at all times.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. One of the primary reasons why you</p> <p>7 carried cash was to pay the girls in this age</p> <p>8 group of C. and T. for whatever happened at the</p> <p>9 house. Right?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: Yes.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. That's a fair statement. Right?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: Yes.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. Okay. And when C., let's use her for</p> <p>18 example, would bring somebody else to the house,</p> <p>19 did you pay C. as well as whomever she brought to</p> <p>20 the house, pay them both?</p> <p>21 A. No, I pay only one person.</p> <p>22 Q. Okay. My understanding, and tell me if</p> <p>23 this is wrong or you can corroborate this, is that</p> <p>24 Mr. Epstein would pay the girl that was actually</p> <p>25 performing whatever was happening in the room --</p> | <p style="text-align: right;">Page 169</p> <p>1 Q. What about Ghislaine Maxwell?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: You're talking about the</p> <p>4 boss. I don't know.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. To your knowledge was Ghislaine Maxwell</p> <p>7 aware of these girls that are in the age group of</p> <p>8 C. and T. coming to Jeffrey Epstein's house to</p> <p>9 have a good time?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: I have to say something.</p> <p>12 Mrs. Maxwell called me and told me not to</p> <p>13 ever discuss or contact her again in a</p> <p>14 threaten way.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q. When was this?</p> <p>17 A. Right after I left because I call one of</p> <p>18 the friends for a job and she told me this, but,</p> <p>19 you know, I feel intimidated and so I want to keep</p> <p>20 her out.</p> <p>21 Q. What exactly did she say? First of all,</p> <p>22 was this a telephone call?</p> <p>23 A. Yes, she was in New York.</p> <p>24 Q. She called you on your cell phone?</p> <p>25 A. Yes.</p> |

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| <p style="text-align: right;">Page 238</p> <p>1 Cab Company?</p> <p>2 A. West Palm Beach Taxi. No, it's not</p> <p>3 Yellow. Could be Yellow, but I don't know.</p> <p>4 Q. Would Mr. Epstein have the names or the</p> <p>5 list?</p> <p>6 A. Probably.</p> <p>7 MR. CRITTON: Form.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Anybody else?</p> <p>10 A. Sarah.</p> <p>11 Q. Sarah would have?</p> <p>12 A. Yes.</p> <p>13 Q. In addition to Mr. Epstein obviously</p> <p>14 knowing who's coming to and from the house, would</p> <p>15 Sarah also be familiar with the names of the girls</p> <p>16 and who they were?</p> <p>17 A. Yes.</p> <p>18 Q. In addition to Sarah and Mr. Epstein</p> <p>19 would Ghislaine Maxwell be familiar with the names</p> <p>20 of some of these girls?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. Are these names kept in a database in a</p> <p>25 computer system?</p>                                                                                                              | <p style="text-align: right;">Page 240</p> <p>1 A. Nadia was the number one girlfriend for</p> <p>2 Mr. Epstein. Very sweet girl, and she was always</p> <p>3 -- she would come over to the house but different</p> <p>4 girls with her all the time.</p> <p>5 Q. Okay. But Nadia, that's somebody who</p> <p>6 lives in New York?</p> <p>7 A. Nadia, I believe, yes, her address is in</p> <p>8 New York.</p> <p>9 Q. So how often would she stay at 358 El</p> <p>10 Brillo?</p> <p>11 A. Very often.</p> <p>12 Q. Usually every time when Mr. Epstein was</p> <p>13 there?</p> <p>14 A. Yes.</p> <p>15 Q. And she would for the most time fly on</p> <p>16 the plane with Mr. Epstein?</p> <p>17 A. Yes.</p> <p>18 Q. And it would be her and Mr. Epstein and</p> <p>19 oftentimes some other girls?</p> <p>20 A. Exactly.</p> <p>21 Q. Where some points I think earlier when</p> <p>22 Mr. Mermelstein was asking you questions where</p> <p>23 there was some confusion was we're talking about</p> <p>24 two different sets of girls, the girls that would</p> <p>25 come over and be labelled masseuses from the Palm</p>                                                 |
| <p style="text-align: right;">Page 239</p> <p>1 A. Could be.</p> <p>2 MR. CRITTON: I'm sorry, did you say</p> <p>3 could be?</p> <p>4 THE WITNESS: Yeah.</p> <p>5 MR. CRITTON: Move to strike as</p> <p>6 speculation.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. When you say could be, why do you say</p> <p>9 that?</p> <p>10 A. Because there were too many and they were</p> <p>11 very organized and there is nothing you write on a</p> <p>12 piece of paper.</p> <p>13 Q. When you say they were very organized,</p> <p>14 are we talking --</p> <p>15 A. Mr. Epstein and Sarah.</p> <p>16 Q. Anybody else beside Mr. Epstein and</p> <p>17 Sarah, I guess beside Sarah that would do the</p> <p>18 scheduling to coordinate the times these girls</p> <p>19 would come to the house?</p> <p>20 A. I'm sorry, anybody else you say?</p> <p>21 Q. Right, aside from Sarah.</p> <p>22 A. No, no.</p> <p>23 Q. And do you know what role, if any, Nadia</p> <p>24 Marcenacova ever played in any of what would go on</p> <p>25 behind the bedroom door with Mr. Epstein?</p> | <p style="text-align: right;">Page 241</p> <p>1 Beach area, and the girls that would fly on the</p> <p>2 plane with Mr. Epstein and Ms. Marcenacova.</p> <p>3 So, what I'm asking you is what, if any,</p> <p>4 involvement did Nadia Marcenacova have with the</p> <p>5 girls that would arrive and be labeled as</p> <p>6 masseuses behind closed doors with Mr. Epstein?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: He was the second -- the</p> <p>9 first role was Sarah and she was always --</p> <p>10 Nadia is a very shy person so she will be in</p> <p>11 the background.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. Did you ever know of Nadia Marcenacova to</p> <p>14 engage in -- to be in the room with Mr. Epstein</p> <p>15 while any of these young girls were up there?</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: Yeah.</p> <p>18 BY MR. EPSTEIN:</p> <p>19 Q. How often do you remember Nadia and Mr.</p> <p>20 Epstein being in the room with any of these young</p> <p>21 girls?</p> <p>22 A. I would say most of the time.</p> <p>23 Q. Nadia would go up there too?</p> <p>24 A. Yeah.</p> <p>25 Q. Did you ever believe that Nadia was</p> |

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| <p style="text-align: right;">Page 250</p> <p>1 Q. Would you know the name if I said it?</p> <p>2 A. Yeah.</p> <p>3 Q. Bill Riley?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Have you ever spoken with an</p> <p>6 investigator Paul Lavery?</p> <p>7 A. Could be, I'm not sure.</p> <p>8 Q. Okay. So Bill Riley came by your house</p> <p>9 personally?</p> <p>10 A. Yes.</p> <p>11 Q. And how long did you meet with him?</p> <p>12 A. Five minutes. He gave me his card, he</p> <p>13 gave me Mr. Critton telephone number, he said</p> <p>14 don't talk to Mr. Goldberger.</p> <p>15 Q. Did he tell you why you should call Mr.</p> <p>16 Critton?</p> <p>17 A. No. I assume that he was not on the case</p> <p>18 anymore, but I didn't ask questions but --</p> <p>19 Q. You assumed that who wasn't on the case</p> <p>20 anymore?</p> <p>21 A. Mr. Goldberger, Jack Goldberger.</p> <p>22 Q. Okay. But what I'm asking you, I guess,</p> <p>23 is did this investigator, Mr. Riley, tell you why</p> <p>24 it was important for you to call any attorney</p> <p>25 that's associated with Mr. Epstein, why was that</p>                                                                                                                          | <p style="text-align: right;">Page 252</p> <p>1 A. We discuss -- he asked me a lot of</p> <p>2 questions, obviously he didn't know a lot of</p> <p>3 things about the case, and I told him who I was,</p> <p>4 what I did in the house.</p> <p>5 Q. He told you he didn't know a lot about</p> <p>6 the case?</p> <p>7 A. No, no, no. He asked me questions about</p> <p>8 so I got the feeling that Mr. Critton didn't know</p> <p>9 as much as other lawyers.</p> <p>10 Q. Okay. Did you tell him what you told us</p> <p>11 here today?</p> <p>12 A. No. He asked me tell the truth, you</p> <p>13 know, just go over there, you know, he advise me</p> <p>14 like you're on your own, Alfredo, just tell the</p> <p>15 truth, you know. He didn't give me any advice.</p> <p>16 He paid for my gas. Thank you very much.</p> <p>17 And that's it, you know.</p> <p>18 The main thing I wanted to have a lawyer</p> <p>19 on my side but then I keep going to the first</p> <p>20 instance when my wife told me you don't need a</p> <p>21 lawyer, and I'm here today to say that, I'm here,</p> <p>22 I'm speaking the truth.</p> <p>23 Q. Okay. You mentioned there were five or</p> <p>24 six computers in the house?</p> <p>25 A. Yes.</p> |
| <p style="text-align: right;">Page 251</p> <p>1 important?</p> <p>2 A. He didn't say that. He didn't say that.</p> <p>3 He just said that get in touch and that's it.</p> <p>4 Because I said what am I going to do, because I</p> <p>5 said I thought this was -- you know, but I didn't</p> <p>6 know I was going to be subpoena. And like I said</p> <p>7 in the beginning of this deposition, I don't have</p> <p>8 an attorney so I don't have money, first of all,</p> <p>9 to pay for an attorney. First of all, I don't</p> <p>10 think I'm in trouble, but every time you hear high</p> <p>11 powered lawyers you feel intimidated so I said,</p> <p>12 listen, what am I going to do, and that was my</p> <p>13 basic question.</p> <p>14 Q. Okay. So then you spoke with somebody at</p> <p>15 Mr. Critton's office and arranged to meet with him</p> <p>16 personally?</p> <p>17 A. Yes. I called his secretary and we sit</p> <p>18 down with his assistant, the three of us.</p> <p>19 Q. So it was Mr. Critton, yourself, and</p> <p>20 somebody else?</p> <p>21 A. Yes.</p> <p>22 Q. And you sat down for another two hour</p> <p>23 period of time?</p> <p>24 A. Yes.</p> <p>25 Q. And what did you go over in that meeting?</p> | <p style="text-align: right;">Page 253</p> <p>1 Q. And do you know what happened to the</p> <p>2 computers?</p> <p>3 A. No.</p> <p>4 Q. You don't know where they are?</p> <p>5 A. (Shakes head.)</p> <p>6 Q. Nobody has told you?</p> <p>7 A. No.</p> <p>8 Q. You also mentioned there were photographs</p> <p>9 in the house?</p> <p>10 A. In the computers in the files.</p> <p>11 Q. Okay. But there were also still</p> <p>12 photographs around the house?</p> <p>13 A. Oh yes, yes.</p> <p>14 Q. Some of the girls have made the</p> <p>15 allegation that there were photographs of them</p> <p>16 nude in the house. Do you remember seeing that?</p> <p>17 A. In the closet, yeah, in a mosaic. It was</p> <p>18 one frame with probably 15 pictures, small</p> <p>19 pictures.</p> <p>20 MR. CRITTON: Repeat the question back.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. Okay. Some of the girls that have</p> <p>23 lawsuits against Mr. Epstein with allegations</p> <p>24 similar to the allegations that C. and T. have</p> <p>25 made, which is that they were underage when Mr.</p>                                                                                                                                                |

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| <p style="text-align: right;">Page 254</p> <p>1 Epstein was engaging in sex or sex acts with them,<br/>2 also say that they have seen pictures of<br/>3 themselves in frames in Mr. Epstein's house naked.<br/>4 A. In his closet.<br/>5 Q. Other than the picture -- and these are<br/>6 girls who are making the allegation that they were<br/>7 underage and there were pictures of them nude in<br/>8 his house.<br/>9 A. I didn't see pictures of C. there.<br/>10 Q. I'm not talking about C. I'm saying<br/>11 other girls that were underage or have made<br/>12 allegations that they have seen pictures of<br/>13 themselves in Mr. Epstein's house.<br/>14 MR. CRITTON: Form.<br/>15 BY MR. EDWARDS:<br/>16 Q. Where would those photos have been, or<br/>17 did you see them?<br/>18 A. Yes, I see them inside his closet.<br/>19 Q. It's one mosaic?<br/>20 A. Yes, one mosaic.<br/>21 Q. Other than there did you see any of these<br/>22 pictures of young girls nude anywhere else in the<br/>23 house?<br/>24 MR. CRITTON: Form.<br/>25 THE WITNESS: Nude with an art, yes, but</p> | <p style="text-align: right;">Page 256</p> <p>1 those photos?<br/>2 A. One was a Columbian lady and one was --<br/>3 one from Spain, beautiful girls, that, you know,<br/>4 but they were not -- not the ones the girls we're<br/>5 talking about here.<br/>6 Q. Okay. When you were hired were you hired<br/>7 by Mr. Epstein or were you hired by one of his<br/>8 companies?<br/>9 A. Mrs. Maxwell.<br/>10 Q. So it was -- was it a company owned by<br/>11 Mrs. Maxwell?<br/>12 A. Not directly. My paycheck was Jeffrey<br/>13 Epstein. I mean, I was hired by Mr. Epstein<br/>14 but --<br/>15 Q. Okay. I just understood you to say you<br/>16 were hired by Mrs. Maxwell.<br/>17 A. Exactly, she told me you're hired but<br/>18 you're going to get paid by Mr. Epstein.<br/>19 Q. And he wrote you personal checks?<br/>20 A. No. The checks that came from New York,<br/>21 Jeffrey Epstein Companies.<br/>22 Q. It was out of his company?<br/>23 A. Yes.<br/>24 Q. Which company; do you know?<br/>25 A. 456 Madison Avenue. It's next to the New</p> |
| <p style="text-align: right;">Page 255</p> <p>1 not pornography. You know, I saw them, they<br/>2 were all over the place. For instance, in<br/>3 the back only showing part of the rear, you<br/>4 know.<br/>5 BY MR. EDWARDS:<br/>6 Q. But the photographs that I'm concerned<br/>7 with --<br/>8 A. Not frontal pictures.<br/>9 Q. The photographs I'm concerned with are<br/>10 photographs of these West Palm Beach girls that<br/>11 were labeled as masseuses that are being displayed<br/>12 around the house anywhere in some state of<br/>13 undress.<br/>14 MR. CRITTON: Form.<br/>15 THE WITNESS: No, I don't remember that.<br/>16 BY MR. EDWARDS:<br/>17 Q. Okay. The only girls that -- the only<br/>18 photograph that you remember of young girls nude<br/>19 was in a mosaic that is in his closet?<br/>20 A. Yes.<br/>21 Q. Nothing that you remember that was on<br/>22 display?<br/>23 A. Downstairs, yes, but they were not these<br/>24 girls, they were somebody else.<br/>25 Q. Okay. Do you know who was -- who were in</p>                                                | <p style="text-align: right;">Page 257</p> <p>1 York Palace now.<br/>2 Q. The name of the company is 456 Madison<br/>3 Avenue?<br/>4 A. No, no, it's -- I got it on the tip of my<br/>5 tongue. Something like Caribbean or island<br/>6 something investments, something like that.<br/>7 If you call Lesley, her secretary, she<br/>8 will tell you exactly. Because they answer the<br/>9 phone like that, you know.<br/>10 Q. What's Lesley's number?<br/>11 A. Lesley, I don't have it. I can find out<br/>12 for you.<br/>13 Q. Do you think you could get Lesley's<br/>14 number for us?<br/>15 A. Yes. It's in Manhattan.<br/>16 Q. Does she work for this company in<br/>17 Manhattan?<br/>18 MR. CRITTON: Form.<br/>19 THE WITNESS: Manhattan, yes.<br/>20 BY MR. EDWARDS:<br/>21 Q. If the check was issued did Jeffrey<br/>22 Epstein actually sign it himself?<br/>23 A. No, it came through the comptroller.<br/>24 Q. Who was the comptroller?<br/>25 A. Bella was the assistant comptroller and</p>                                                |

65 (Pages 254 to 257)



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| <p style="text-align: right;">Page 266</p> <p>1 BY MR. LANGINO:<br/> 2 Q. Are you currently in fear of Mr. Epstein?<br/> 3 A. Not at this particular moment but it's<br/> 4 something I have to be worry about, yes.<br/> 5 Q. Are you personally afraid of criminal<br/> 6 prosecution?<br/> 7 A. No.<br/> 8 Q. Do you believe that you did anything<br/> 9 illegal?<br/> 10 A. Illegal, no.<br/> 11 MR. LANGINO: I have no further<br/> 12 questions. Thank you.<br/> 13 MR. CRITTON: We're going to break in<br/> 14 about 15 minutes. Do you want to start and<br/> 15 go for 15 minutes or do you want to -- it's<br/> 16 up to you.<br/> 17 MS. EZELL: I'll start.<br/> 18 MR. WILLITS: When are we going to quit,<br/> 19 folks?<br/> 20 MR. CRITTON: In 15 minutes.<br/> 21 THE VIDEOGRAPHER: Might as well change<br/> 22 tapes.<br/> 23 MR. EDWARDS: Bob has to get back so<br/> 24 we've agreed we're going to come back some<br/> 25 other time.</p> | <p style="text-align: right;">Page 268</p> <p>1 THE STATE OF FLORIDA, )<br/> 2 COUNTY OF DADE. )<br/> 3<br/> 4<br/> 5 I, the undersigned authority, certify<br/> 6 that ALFREDO RODRIGUEZ personally appeared before<br/> 7 me on the 29th day of July, 2009 and was duly<br/> 8 sworn.<br/> 9<br/> 10 WITNESS my hand and official seal this<br/> 11 31st day of July, 2009.<br/> 12<br/> 13<br/> 14<br/> 15<br/> 16 MICHELLE PAYNE, Court Reporter<br/> 17 Notary Public - State of Florida<br/> 18<br/> 19<br/> 20<br/> 21<br/> 22<br/> 23<br/> 24<br/> 25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p style="text-align: right;">Page 267</p> <p>1 MR. WILLITS: Why don't we just stop now?<br/> 2 MS. EZELL: Okay.<br/> 3 MR. EDWARDS: Rather than you start.<br/> 4 MS. EZELL: Yeah, I won't get very far.<br/> 5 MR. EDWARDS: Sorry to do this with you,<br/> 6 we didn't finish.<br/> 7 MR. CRITTON: So we're stopped?<br/> 8 MR. EDWARDS: We're stopped.<br/> 9 THE VIDEOGRAPHER: Off the record.<br/> 10 (Thereupon, the videotaped deposition was<br/> 11 adjourned at 5:30 p.m.)<br/> 12 - - -<br/> 13<br/> 14<br/> 15<br/> 16<br/> 17<br/> 18<br/> 19<br/> 20<br/> 21<br/> 22<br/> 23<br/> 24<br/> 25</p>                                                                                                                                                                                                                                                                                                                                                  | <p style="text-align: right;">Page 269</p> <p>1 CERTIFICATE<br/> 2<br/> 3 The State Of Florida, )<br/> 4 County Of Dade. )<br/> 5<br/> 6 I, MICHELLE PAYNE, Court Reporter and<br/> 7 Notary Public in and for the State of Florida at<br/> 8 large, do hereby certify that I was authorized to<br/> 9 and did stenographically report the videotaped<br/> 10 deposition of ALFREDO RODRIGUEZ; that a review of<br/> 11 the transcript was requested; and that the<br/> 12 foregoing pages, numbered from 1 to 269,<br/> 13 inclusive, are a true and correct transcription of<br/> 14 my stenographic notes of said deposition.<br/> 15 I further certify that said videotaped<br/> 16 deposition was taken at the time and place<br/> 17 hereinabove set forth and that the taking of said<br/> 18 videotaped deposition was commenced and completed<br/> 19 as hereinabove set out.<br/> 20 I further certify that I am not an<br/> 21 attorney or counsel of any of the parties, nor am<br/> 22 I a relative or employee of any attorney or<br/> 23 counsel of party connected with the action, nor am<br/> 24 I financially interested in the action.<br/> 25 The foregoing certification of this<br/> transcript does not apply to any reproduction of<br/> the same by any means unless under the direct<br/> control and/or direction of the certifying<br/> reporter.<br/> DATED this 31st day of July, 2009.<br/> <br/> MICHELLE PAYNE, Court Reporter</p> |

68 (Pages 266 to 269)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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JANE DOE NO. 2,                      CASE NO: 08-CV-80119  
Plaintiff,  
Vs.

JEFFREY EPSTEIN,  
Defendant.  
\_\_\_\_\_ /

JANE DOE NO. 3,                      CASE NO: 08-CV-80232  
Plaintiff,  
Vs.

**CONDENSED**

JEFFREY EPSTEIN,  
Defendant.  
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JANE DOE NO. 4,                      CASE NO: 08-CV-80380  
Plaintiff,  
Vs.

JEFFREY EPSTEIN,  
Defendant.  
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JANE DOE NO. 5,                      CASE NO: 08-CV-80381  
Plaintiff,

Vs

JEFFREY EPSTEIN,  
Defendant.  
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| <p style="text-align: right;">Page 271</p> <p>1 JANE DOE NO. 6, CASE NO: 08-CV-80994<br/>2 Plaintiff,<br/>3 Vs.<br/>4 JEFFREY EPSTEIN,<br/>5 Defendant.<br/>6<br/>7 JANE DOE NO. 7, CASE NO: 08-CV-80993<br/>8 Plaintiff,<br/>9 Vs.<br/>10 JEFFREY EPSTEIN,<br/>11 Defendant.<br/>12 C.M.A., CASE NO: 08-CV-80811<br/>13 Plaintiff,<br/>14 Vs.<br/>15 JEFFREY EPSTEIN,<br/>16 Defendant.<br/>17<br/>18 JANE DOE, CASE NO: 08-CV-80893<br/>19 Plaintiff,<br/>20 Vs.<br/>21 JEFFREY EPSTEIN,<br/>22 Defendant.<br/>23<br/>24<br/>25</p> | <p style="text-align: right;">Page 273</p> <p>1 IN THE CIRCUIT COURT OF THE 15TH<br/>2 JUDICIAL CIRCUIT IN AND FOR<br/>3 PALM BEACH COUNTY, FLORIDA<br/>4 CASE NO. 502008CA037319XXXMB AB<br/>5<br/>6 B.B.,<br/>7 Plaintiff,<br/>8 Vs.<br/>9 JEFFREY EPSTEIN.<br/>10 Defendant.<br/>11<br/>12 1031 Ives Dairy Road<br/>13 Suite 228<br/>14 North Miami, Florida<br/>15 August 7, 2009<br/>16 1:15 p.m. to 5:30 p.m.<br/>17<br/>18 CONTINUED<br/>19 VIDEOTAPED<br/>20 DEPOSITION<br/>21 of<br/>22 ALFREDO RODRIGUEZ<br/>23 taken on behalf of the Plaintiffs pursuant<br/>24 to a Re-Notice of Taking Continued Videotaped<br/>25 Deposition (Duces Tecum)<br/>---</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           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| <p style="text-align: right;">Page 272</p> <p>1 JANE DOE NO. II, CASE NO: 08-CV-80469<br/>2 Plaintiff,<br/>3 Vs.<br/>4 JEFFREY EPSTEIN,<br/>5 Defendant.<br/>6<br/>7 JANE DOE NO. 101 CASE NO: 08-CV-80591<br/>8 Plaintiff,<br/>9 Vs.<br/>10 JEFFREY EPSTEIN,<br/>11 Defendant.<br/>12 JANE DOE NO. 102, CASE NO: 08-CV-80656<br/>13 Plaintiff,<br/>14 Vs.<br/>15 JEFFREY EPSTEIN,<br/>16 Defendant.<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25</p>                                                               | <p style="text-align: right;">Page 274</p> <p>1 APPEARANCES:<br/>2<br/>3 MERMELSTEIN &amp; HOROWITZ, P.A.<br/>4 BY: ADAM HOROWITZ, ESQ.<br/>5 18205 Biscayne Boulevard<br/>6 Suite 2218<br/>7 Miami, Florida 33160<br/>8 Attorney for Jane Doe 2, 3, 4, 5,<br/>9 6, and 7.<br/>10<br/>11 ROTHSTEIN ROSENFELDT ADLER<br/>12 BY: BRAD J. EDWARDS, ESQ., and<br/>13 CARA HOLMES, ESQ.<br/>14 Las Olas City Centre<br/>15 Suite 1650<br/>16 401 East Las Olas Boulevard<br/>17 Fort Lauderdale, Florida 33301<br/>18 Attorney for Jane Doe and E.W.<br/>19 And L.M.<br/>20<br/>21 PODHURST ORSECK<br/>22 BY: KATHERINE W. EZELL, ESQ.<br/>23 25 West Flagler Street<br/>24 Suite 800<br/>25 Miami, Florida 33130<br/>Attorney for Jane Doe 101 and 102.<br/>26<br/>27<br/>28<br/>29<br/>30<br/>31<br/>32<br/>33<br/>34<br/>35<br/>36<br/>37<br/>38<br/>39<br/>40<br/>41<br/>42<br/>43<br/>44<br/>45<br/>46<br/>47<br/>48<br/>49<br/>50<br/>51<br/>52<br/>53<br/>54<br/>55<br/>56<br/>57<br/>58<br/>59<br/>60<br/>61<br/>62<br/>63<br/>64<br/>65<br/>66<br/>67<br/>68<br/>69<br/>70<br/>71<br/>72<br/>73<br/>74<br/>75<br/>76<br/>77<br/>78<br/>79<br/>80<br/>81<br/>82<br/>83<br/>84<br/>85<br/>86<br/>87<br/>88<br/>89<br/>90<br/>91<br/>92<br/>93<br/>94<br/>95<br/>96<br/>97<br/>98<br/>99<br/>100<br/>101<br/>102<br/>103<br/>104<br/>105<br/>106<br/>107<br/>108<br/>109<br/>110<br/>111<br/>112<br/>113<br/>114<br/>115<br/>116<br/>117<br/>118<br/>119<br/>120<br/>121<br/>122<br/>123<br/>124<br/>125<br/>126<br/>127<br/>128<br/>129<br/>130<br/>131<br/>132<br/>133<br/>134<br/>135<br/>136<br/>137<br/>138<br/>139<br/>140<br/>141<br/>142<br/>143<br/>144<br/>145<br/>146<br/>147<br/>148<br/>149<br/>150<br/>151<br/>152<br/>153<br/>154<br/>155<br/>156<br/>157<br/>158<br/>159<br/>160<br/>161<br/>162<br/>163<br/>164<br/>165<br/>166<br/>167<br/>168<br/>169<br/>170<br/>171<br/>172<br/>173<br/>174<br/>175<br/>176<br/>177<br/>178<br/>179<br/>180<br/>181<br/>182<br/>183<br/>184<br/>185<br/>186<br/>187<br/>188<br/>189<br/>190<br/>191<br/>192<br/>193<br/>194<br/>195<br/>196<br/>197<br/>198<br/>199<br/>200<br/>201<br/>202<br/>203<br/>204<br/>205<br/>206<br/>207<br/>208<br/>209<br/>210<br/>211<br/>212<br/>213<br/>214<br/>215<br/>216<br/>217<br/>218<br/>219<br/>220<br/>221<br/>222<br/>223<br/>224<br/>225<br/>226<br/>227<br/>228<br/>229<br/>230<br/>231<br/>232<br/>233<br/>234<br/>235<br/>236<br/>237<br/>238<br/>239<br/>240<br/>241<br/>242<br/>243<br/>244<br/>245<br/>246<br/>247<br/>248<br/>249<br/>250<br/>251<br/>252<br/>253<br/>254<br/>255<br/>256<br/>257<br/>258<br/>259<br/>260<br/>261<br/>262<br/>263<br/>264<br/>265<br/>266<br/>267<br/>268<br/>269<br/>270<br/>271<br/>272<br/>273<br/>274<br/>275<br/>276<br/>277<br/>278<br/>279<br/>280<br/>281<br/>282<br/>283<br/>284<br/>285<br/>286<br/>287<br/>288<br/>289<br/>290<br/>291<br/>292<br/>293<br/>294<br/>295<br/>296<br/>297<br/>298<br/>299<br/>300<br/>301<br/>302<br/>303<br/>304<br/>305<br/>306<br/>307<br/>308<br/>309<br/>310<br/>311<br/>312<br/>313<br/>314<br/>315<br/>316<br/>317<br/>318<br/>319<br/>320<br/>321<br/>322<br/>323<br/>324<br/>325<br/>326<br/>327<br/>328<br/>329<br/>330<br/>331<br/>332<br/>333<br/>334<br/>335<br/>336<br/>337<br/>338<br/>339<br/>340<br/>341<br/>342<br/>343<br/>344<br/>345<br/>346<br/>347<br/>348<br/>349<br/>350<br/>351<br/>352<br/>353<br/>354<br/>355<br/>356<br/>357<br/>358<br/>359<br/>360<br/>361<br/>362<br/>363<br/>364<br/>365<br/>366<br/>367<br/>368<br/>369<br/>370<br/>371<br/>372<br/>373<br/>374<br/>375<br/>376<br/>377<br/>378<br/>379<br/>380<br/>381<br/>382<br/>383<br/>384<br/>385<br/>386<br/>387<br/>388<br/>389<br/>390<br/>391<br/>392<br/>393<br/>394<br/>395<br/>396<br/>397<br/>398<br/>399<br/>400<br/>401<br/>402<br/>403<br/>404<br/>405<br/>406<br/>407<br/>408<br/>409<br/>410<br/>411<br/>412<br/>413<br/>414<br/>415<br/>416<br/>417<br/>418<br/>419<br/>420<br/>421<br/>422<br/>423<br/>424<br/>425<br/>426<br/>427<br/>428<br/>429<br/>430<br/>431<br/>432<br/>433<br/>434<br/>435<br/>436<br/>437<br/>438<br/>439<br/>440<br/>441<br/>442<br/>443<br/>444<br/>445<br/>446<br/>447<br/>448<br/>449<br/>450<br/>451<br/>452<br/>453<br/>454<br/>455<br/>456<br/>457<br/>458<br/>459<br/>460<br/>461<br/>462<br/>463<br/>464<br/>465<br/>466<br/>467<br/>468<br/>469<br/>470<br/>471<br/>472<br/>473<br/>474<br/>475<br/>476<br/>477<br/>478<br/>479<br/>480<br/>481<br/>482<br/>483<br/>484<br/>485<br/>486<br/>487<br/>488<br/>489<br/>490<br/>491<br/>492<br/>493<br/>494<br/>495<br/>496<br/>497<br/>498<br/>499<br/>500<br/>501<br/>502<br/>503<br/>504<br/>505<br/>506<br/>507<br/>508<br/>509<br/>510<br/>511<br/>512<br/>513<br/>514<br/>515<br/>516<br/>517<br/>518<br/>519<br/>520<br/>521<br/>522<br/>523<br/>524<br/>525<br/>526<br/>527<br/>528<br/>529<br/>530<br/>531<br/>532<br/>533<br/>534<br/>535<br/>536<br/>537<br/>538<br/>539<br/>540<br/>541<br/>542<br/>543<br/>544<br/>545<br/>546<br/>547<br/>548<br/>549<br/>550<br/>551<br/>552<br/>553<br/>554<br/>555<br/>556<br/>557<br/>558<br/>559<br/>560<br/>561<br/>562<br/>563<br/>564<br/>565<br/>566<br/>567<br/>568<br/>569<br/>570<br/>571<br/>572<br/>573<br/>574<br/>575<br/>576<br/>577<br/>578<br/>579<br/>580<br/>581<br/>582<br/>583<br/>584<br/>585<br/>586<br/>587<br/>588<br/>589<br/>590<br/>591<br/>592<br/>593<br/>594<br/>595<br/>596<br/>597<br/>598<br/>599<br/>600<br/>601<br/>602<br/>603<br/>604<br/>605<br/>606<br/>607<br/>608<br/>609<br/>610<br/>611<br/>612<br/>613<br/>614<br/>615<br/>616<br/>617<br/>618<br/>619<br/>620<br/>621<br/>622<br/>623<br/>624<br/>625<br/>626<br/>627<br/>628<br/>629<br/>630<br/>631<br/>632<br/>633<br/>634<br/>635<br/>636<br/>637<br/>638<br/>639<br/>640<br/>641<br/>642<br/>643<br/>644<br/>645<br/>646<br/>647<br/>648<br/>649<br/>650<br/>651<br/>652<br/>653<br/>654<br/>655<br/>656<br/>657<br/>658<br/>6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2 (Pages 271 to 274)

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| <p style="text-align: right;">Page 299</p> <p>1 A. I don't remember, Ma'am. He came from<br/>2 New Albany, Ohio.<br/>3 Q. From New --<br/>4 A. New Albany, Ohio.<br/>5 Q. New Albany, Ohio. Did he have his own<br/>6 business?<br/>7 A. No, he worked for Mr. Epstein. He will<br/>8 maintain all the computers.<br/>9 Q. Was he there everyday?<br/>10 A. No, ma'am.<br/>11 Q. Do you know whether at that time Mr.<br/>12 Epstein had an office in Palm Beach?<br/>13 A. Not outside the house, no.<br/>14 Q. Do you have any knowledge of whether or<br/>15 not the video equipment was -- and I don't know<br/>16 the technical term, forgive me, but was it the<br/>17 kind of equipment that would record for a certain<br/>18 amount of time and then record over that film?<br/>19 A. I don't know.<br/>20 MR. CRITTON: Form.<br/>21 BY MS. EZELL:<br/>22 Q. You don't know?<br/>23 A. No, ma'am.<br/>24 MR. CRITTON: Just for clarification, I<br/>25 may have misunderstood, but I thought he</p> | <p style="text-align: right;">Page 301</p> <p>1 video, even phones.<br/>2 Q. Would he also repair the televisions if<br/>3 they needed work?<br/>4 A. No.<br/>5 Q. No. Did you have any kind of intercom<br/>6 system in the house?<br/>7 A. Yes, ma'am.<br/>8 Q. And what kind of system was that?<br/>9 A. It was standard office equipment, Lucid<br/>10 Technologies maybe, but it was an intercom like we<br/>11 using right now.<br/>12 MS. EZELL: Just let the record reflect<br/>13 that the witness pointed to the telephone on<br/>14 the table that has a speaker phone.<br/>15 THE WITNESS: Yes, ma'am.<br/>16 BY MS. EZELL:<br/>17 Q. And did you use that in your work?<br/>18 A. Yes, ma'am.<br/>19 Q. And what did you use it for?<br/>20 A. Mr. Epstein used to page me when he<br/>21 needed me.<br/>22 Q. Did you have one of those phones in the<br/>23 kitchen?<br/>24 A. Yes, ma'am.<br/>25 Q. And was there one out in the staff house</p> |
| <p style="text-align: right;">Page 300</p> <p>1 said he didn't even know the video equipment<br/>2 existed until he read the FBI report.<br/>3 MS. EZELL: He said he didn't know that<br/>4 it was upstairs and downstairs, I believe.<br/>5 MR. CRITTON: I thought he said he didn't<br/>6 know that it even existed.<br/>7 MS. EZELL: I may be wrong.<br/>8 BY MS. EZELL:<br/>9 Q. Did you know it existed before you read<br/>10 the FBI report?<br/>11 A. No, ma'am.<br/>12 Q. I'm sorry, then I was wrong.<br/>13 How did you know then that the young<br/>14 technician from Ohio maintained the computers and<br/>15 the video equipment?<br/>16 A. Because we used to request -- there were</p>                                                                                                                                                                                                                                                                                                      | <p style="text-align: right;">Page 302</p> <p>1 as well?<br/>2 A. Yes, ma'am.<br/>3 Q. Do you know where others were in the<br/>4 house?<br/>5 A. Probably have like 15 phones. We used to<br/>6 have three in the staff house, one in the cabana,<br/>7 two in the master bedroom, one in each room,<br/>8 kitchen, dining room, Mrs. Maxwell's office, the<br/>9 garage.<br/>10 Q. Where was Mrs. Maxwell's office?<br/>11 A. Under the stairs next to the kitchen.<br/>12 Q. Can you give me some idea of what size<br/>13 space that was?<br/>14 A. It was probably -- we change the floor.<br/>15 Twelve by five, something like that.<br/>16 Q. And was the computer equipment in that</p>                                                                                                                                                                                                                                                                  |
| <p>17 always problems with the computers so he came to<br/>18 the house and he was the programmer. It was very<br/>19 sophisticated.<br/>20 MR. CRITTON: Form to the last question,<br/>21 move to strike the answer as nonresponsive.<br/>22 BY MS. EZELL:<br/>23 Q. How did you know then that he maintained<br/>24 the video equipment as well?<br/>25 A. Because he was in charge of computers,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>17 space?<br/>18 A. Yes, ma'am.<br/>19 Q. Do you know whether Ms. Maxwell kept the<br/>20 names and telephone numbers of the girls who came<br/>21 to do massages?<br/>22 A. Yes, ma'am.<br/>23 MR. CRITTON: Form.<br/>24 BY MS. EZELL:<br/>25 Q. Do you know that because you saw the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

9 (Pages 299 to 302)



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| <p style="text-align: right;">Page 303</p> <p>1 names and phone numbers?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes, ma'am.</p> <p>4 BY MS. EZELL:</p> <p>5 Q. Do you know if she kept pictures of the</p> <p>6 girls on the computer?</p> <p>7 A. Yes, she did.</p> <p>8 Q. And you know that as well because you</p> <p>9 happen to see them?</p> <p>10 A. Yes, ma'am.</p> <p>11 MR. CRITTON: Form to the last two</p> <p>12 questions.</p> <p>13 BY MS. EZELL:</p> <p>14 Q. Were they similar to the pictures that</p> <p>15 Ms. Kellen had on her computer?</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: Yes, ma'am.</p> <p>18 BY MS. EZELL:</p> <p>19 Q. Did the pictures that they kept there</p> <p>20 look like pictures that were posed?</p> <p>21 A. They were more casual.</p> <p>22 Q. Did they look as though the person being</p> <p>23 photographed knew that they were being</p> <p>24 photographed?</p> <p>25 MR. CRITTON: Form.</p> | <p style="text-align: right;">Page 305</p> <p>1 computer?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes, ma'am.</p> <p>4 BY MS. EZELL:</p> <p>5 Q. And did she generally have phone numbers</p> <p>6 for those girls?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. And were they generally pictures of the</p> <p>9 girls?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: No, ma'am.</p> <p>12 BY MS. EZELL:</p> <p>13 Q. And did Ms. Maxwell have a list of the</p> <p>14 girls who came to give massages?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Yes, ma'am.</p> <p>17 BY MS. EZELL:</p> <p>18 Q. Did she have telephone numbers generally?</p> <p>19 A. Yes, ma'am.</p> <p>20 MR. CRITTON: Form.</p> <p>21 BY MS. EZELL:</p> <p>22 Q. Were there pictures on her computer of</p> <p>23 the girls who came to give massages?</p> <p>24 MR. CRITTON: Form.</p> <p>25 BY MS. EZELL:</p> |
| <p style="text-align: right;">Page 304</p> <p>1 THE WITNESS: No, ma'am.</p> <p>2 BY MS. EZELL:</p> <p>3 Q. And what can you tell me about that, what</p> <p>4 lead you to draw that conclusion?</p> <p>5 A. They were probably taken in parties in</p> <p>6 big reception or banquet.</p> <p>7 MR. CRITTON: Let me offer as a</p> <p>8 suggestion, not that you have to accept or</p> <p>9 that you would, you're using the term young</p> <p>10 girls generically, he has probably seen</p> <p>11 many, many young girls, there was no --</p> <p>12 you've used it interchangeably with just</p> <p>13 young girls versus young girls who may have</p> <p>14 come to -- purported to give a massage and,</p> <p>15 therefore, that may be a different answer,</p> <p>16 so that's part of my form objection.</p>                                                                                                                                                       | <p style="text-align: right;">Page 306</p> <p>1 Q. Ms. Maxwell I'm talking about.</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. And were those pictures the more casual</p> <p>4 ones that you described when I asked whether or</p> <p>5 not the subject looked as though she knew she was</p> <p>6 being photographed?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: I'm sorry, can you repeat?</p> <p>9 BY MS. EZELL:</p> <p>10 Q. Yeah. The pictures of the young girls</p> <p>11 who came to the house to give massages that were</p> <p>12 on Ms. Maxwell's computer, did they appear to have</p> <p>13 been taken when the girls knew they were being</p> <p>14 photographed?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: I don't think they knew</p>                                                                                                                                           |
| <p>17 MS. EZELL: Okay, thank you.</p> <p>18 BY MS. EZELL:</p> <p>19 Q. When I asked you about Ms. Kellen whether</p> <p>20 she had a list of the girls and telephone numbers,</p> <p>21 I think I asked about those girls that came to</p> <p>22 give massages, but let me go back and just ask it</p> <p>23 that way.</p> <p>24 Did you notice that Ms. Kellen had a list</p> <p>25 of the girls that came to give massages on her</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>17 they were being photographed.</p> <p>18 BY MS. EZELL:</p> <p>19 Q. I believe you said they were more casual</p> <p>20 pictures.</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Did you notice any nude photographs in</p> <p>23 those pictures?</p> <p>24 A. Yes, ma'am.</p> <p>25 MR. CRITTON: Form for the last question.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

10 (Pages 303 to 306)

Page 471

1 THE STATE OF FLORIDA, )  
 2 COUNTY OF DADE. )  
 3  
 4

5 I, the undersigned authority, certify  
 6 that ALFREDO RODRIGUEZ personally appeared before  
 7 me on the 7th day of August, 2009 and was duly  
 8 sworn.  
 9

10 WITNESS my hand and official seal this  
 11 18th day of August, 2009.  
 12  
 13  
 14  
 15

16 MICHELLE PAYNE, Court Reporter  
 17 Notary Public - State of Florida  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 472

1 CERTIFICATE  
 2

3 The State Of Florida, )  
 4 County Of Dade. )  
 5

6 I, MICHELLE PAYNE, Court Reporter and  
 7 Notary Public in and for the State of Florida at  
 8 large, do hereby certify that I was authorized to  
 9 and did stenographically report the deposition of  
 10 ALFREDO RODRIGUEZ; that a review of the transcript  
 11 was not requested; and that the foregoing pages,  
 12 numbered from 270 to 472, inclusive, are a true  
 13 and correct transcription of my stenographic notes  
 14 of said deposition.  
 15

16 I further certify that said deposition was  
 17 taken at the time and place hereinabove set forth  
 18 and that the taking of said deposition was  
 19 commenced and completed as hereinabove set out.  
 20

21 I further certify that I am not an  
 22 attorney or counsel of any of the parties, nor am  
 23 I a relative or employee of any attorney or  
 24 counsel of party connected with the action, nor am  
 25 I financially interested in the action.

16 The foregoing certification of this  
 17 transcript does not apply to any reproduction of  
 18 the same by any means unless under the direct  
 19 control and/or direction of the certifying  
 20 reporter.  
 21

22 DATED this 18th day of August, 2009.  
 23  
 24  
 25

26 MICHELLE PAYNE, Court Reporter

52 (Pages 471 to 472)

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