

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***VIRGINIA GIUFFRE***

*05/03/2016*

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***Agren Blando Court Reporting & Video, Inc.***

*216 16th Street, Suite 600*

*Denver Colorado, 80202*

*303-296-0017*

1           A           I believe this is when I was hoping to  
2           join the CVRA case.

3           Q           All right. And do you know when this  
4           document was filed?

5                       And actually, just to be clear, about  
6           halfway there's actually a second document that was  
7           filed. So this is a composite exhibit. Let me be  
8           very clear.

9                       So after page 14 -- I'm sorry, 13, there's  
10          a second document that is styled Jane Doe #3 and Jane  
11          Doe #4's Corrected Motion Pursuant to Rule 21 for  
12          Joinder In Action.

13                      Do you see that?

14          A           Did you say page 14?

15          Q           It is on the 14th page of this document.

16                      Do you see that?

17          A           I do.

18          Q           And so this composite Exhibit 2 has both a  
19          motion and a corrected motion.

20                      Do you see that?

21          A           Yes.

22          Q           And were both of those pleadings  
23          authorized by you to be filed?

24          A           Yes.

25          Q           In other words, you wanted to join the

1 CVRA action in or about December 30th, 2014, correct?

2 A I -- I'm not aware of the exact dates.

3 There's no dates on this. But I did try to join the  
4 motion, yes.

5 Q All right. If you can look at the top  
6 line of the document.

7 A Yes.

8 Q Does it say, Entered on FLSD --

9 A Oh, it does, too, I'm sorry, yes.

10 Q That's all right. So does that refresh  
11 your memory as to about when you first sought to join  
12 the CVRA action?

13 A Yes.

14 Q December 30th, 2014, correct?

15 A Yes.

16 Q And the corrected motion was filed a few  
17 days later, correct?

18 A Yes, correct.

19 Q If I could turn to Defendant's Exhibit 3,  
20 which was January 21st.

21 (Exhibit 3 marked.)

22 MR. EDWARDS: Thank you.

23 Q (BY MS. MENNINGER) Do you recognize this  
24 document?

25 A Yes, I do.

1 physical features of Ghislaine Maxwell?

2 A I can tell you that she had very large  
3 natural breasts. I can tell you that her pubic hair  
4 was dark brown, nearly black. I don't remember any  
5 specific birthmarks or moles that I could point out  
6 that would be relevant.

7 Q Any scar?

8 A I don't remember any scars.

9 Q Any tattoos?

10 A No tattoos.

11 Q When did you next go to the El Brillo  
12 house?

13 A I believe it would have been the next day.

14 Q You believe it would have been or was it?

15 MR. EDWARDS: Form.

16 A I know that it was consecutive, that I  
17 continued to go there after my first -- the first  
18 time that the abuse took place there. It was  
19 consecutive that I was there, I believe, over the  
20 next course of weeks.

21 Q (BY MS. MENNINGER) What day of the week  
22 was the first time you went?

23 A I don't know.

24 Q Do you know whether you went the very next  
25 day or not?

1 A I believe I did.

2 Q All right. How did you get there the very  
3 next day?

4 MR. EDWARDS: Form.

5 A I believe my dad dropped me off again.

6 Q (BY MS. MENNINGER) When you say you  
7 believe, do you recall him doing that or are you  
8 guessing?

9 A I don't -- well, this is how I figure  
10 this. I don't remember Ghislaine picking me up from  
11 Mar-a-Lago. I didn't have my own car. So the only  
12 way I could have really gotten there would have been  
13 my dad picking me up -- I mean, sorry, dropping me  
14 off.

15 Q Do you have a distinct recollection of  
16 your father dropping you off there more than one day  
17 in a row?

18 A Yes.

19 Q You do not recall the car he was driving?

20 A Like I said, he always drove trucks.  
21 That's as good as I can get.

22 Q And so -- and you worked on weekends as  
23 well at Mar-a-Lago or no?

24 A No.

25 Q So the second day would have had to be

1 A I wouldn't say directly.

2 Q How --

3 A I'd say I stayed with my parents for --  
4 like, I think I finished school at Crestwood. So I  
5 would have been in, I don't know, I guess eighth  
6 grade, finished eighth grade. And then -- I don't  
7 know. I really don't know. Around eighth grade.

8 Q You went to Growing Together?

9 A I think -- I think it was then.

10 Q And how many years did you live at Growing  
11 Together?

12 A Over a year.

13 Q Were you ever in foster care?

14 A What Growing Together was, was like a  
15 group home that sent you away to foster parents every  
16 night.

17 Q So you lived in other people's homes  
18 during the period of time you were assigned to  
19 Growing Together?

20 A Well, you stayed at Growing Together  
21 during the day and then at night you get sent home  
22 with parents.

23 Q Did you go to school while you were at  
24 Growing Together?

25 A Yeah, they offer education there.

1 Q So the education was at Growing Together?

2 A Yeah.

3 Q You did not attend a Palm Beach County --

4 A I did, but you had to earn your levels up  
5 to be able to go outside. So I don't remember what  
6 level you have to get up to, to go out to another  
7 school. I think there was like seven levels or  
8 something. And you had to make it to, like, level 4  
9 to be able to go to outside school.

10 Q So for some period of time you were  
11 assigned to Growing Together and you were going to  
12 school at Growing Together. And for some period of  
13 time you were going to other schools and coming back  
14 to Growing Together?

15 A Correct.

16 Q And then when you came back to Growing  
17 Together, you were sent to spend the night at a  
18 family's home?

19 A Yes.

20 Q So you never slept at Growing Together?

21 A No.

22 Q Did you live -- other than living at or  
23 staying at Growing Together during the day and  
24 sleeping at these other homes at night, is there  
25 anywhere else that you recall living in the period

1 a 3. I think it's [REDACTED]  
[REDACTED]. I really can't make out  
3 the telephone number.

4 Q Okay. Do you see Relationship? Can you  
5 read that?

6 A Friend.

7 Q Okay. Do you see just below that there's  
8 a line that says number 21?

9 A Do not stop -- sorry, Do not sign  
10 application until requested to do so by  
11 administrating an oath.

12 Q Okay.

13 A Applicant's signature age 13 or older.

14 Q Oh, it's by the signature line?

15 A Yeah.

16 Q And that's your signature?

17 A Yes.

18 Q All right. And this is the document that  
19 you recall filling out for your first passport?

20 A I don't recall doing it, but yes, it's in  
21 my handwriting and it's got all of my information on  
22 it.

23 Q Okay. And on line -- box 23 it's got your  
24 driver's license checked off, right?

25 A July 23. Yeah, I really can't make out



1 And when they say massage, that means erotic, okay?  
2 That's their term for it. I think there are plenty  
3 of other witnesses that can attest to what massage  
4 actually means.

5 And I'm telling you that Ghislaine told me  
6 to go to Glenn Dubin and give him a massage, which  
7 means sex.

8 Q Okay. So Glenn -- Ghislaine Maxwell told  
9 you to go give a massage to Glenn Dubin?

10 A Correct.

11 Q That's your testimony?

12 A That is my testimony.

13 Q All right. Ghislaine Maxwell told you to  
14 go give a massage to [REDACTED], correct?

15 A Correct.

16 Q Ghislaine Maxwell told you to give a  
17 massage to Prince Andrew, correct?

18 A Correct.

19 Q Ghislaine Maxwell told you to give a  
20 massage to Bill Richardson, correct?

21 A Correct.

22 Q When did Ghislaine Maxwell tell you to  
23 give a massage to Bill Richardson?

24 A I don't know dates.

25 Q Where were you?

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

1 to have sex with Jean Luc Brunel?

2 MR. EDWARDS: Object to the form.

3 Mischaracterized her testimony.

4 A Many places.

5 Q (BY MS. MENNINGER) Ghislaine Maxwell sent  
6 you to many places to have sex with Jean Luc Brunel?

7 MR. EDWARDS: Object to the form.

8 A It happened at many places, yes.

9 Q (BY MS. MENNINGER) You had sex with Jean  
10 Luc Brunel at many places is what you're saying,  
11 correct?

12 A I was sent to Jean Luc Brunel at many  
13 places to have sex with him.

14 Q When did Ghislaine Maxwell send you to a  
15 place to have sex with Jean Luc Brunel?

16 A You are asking --

17 MR. EDWARDS: Form.

18 A -- me to answer the impossible.

19 Q (BY MS. MENNINGER) All right. When did  
20 Ghislaine Maxwell send you to have sex with the owner  
21 of a large hotel chain?

22 MR. EDWARDS: Object to the form.

23 Mischaracterization.

24 A I'm going to keep answering the questions  
25 the same way that I keep answering them. I don't

1 know where it was when she said to go do this.

2 Q (BY MS. MENNINGER) Okay. Where were you  
3 sent to have sex with the owner of a large hotel  
4 chain by Ghislaine Maxwell?

5 MR. EDWARDS: Object to the form.

6 A I believe that was one time in France.

7 Q (BY MS. MENNINGER) Which time in France?

8 A I believe it was around the same time that  
9 Naomi Campbell had a birthday party.

10 Q Where did you have sex with the owner of a  
11 large hotel chain in France around the time of Naomi  
12 Campbell's birthday party?

13 A In his own cabana townhouse thing. It was  
14 part of a hotel, but I wouldn't call it a hotel.

15 Jeffrey was staying there. Ghislaine was  
16 staying there. Emmy was staying there. I was  
17 staying there. This other guy was staying there. I  
18 don't know his name.

19 I was instructed by Ghislaine to go and  
20 give him an erotic massage.

21 Q She used the words erotic massage?

22 A No, that's my word. The word massage is  
23 what they would use. That's their code word.

24 Q Was she in the room when you gave this  
25 erotic massage to the owner of a large hotel chain?

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, [REDACTED],  
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

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

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.

1 Q Including Mr. Edwards, who is sitting  
2 right here, correct?

3 A Correct.

4 Q What did that journal look like?

5 A It was green.

6 Q And what else?

7 A It was just a spiral notebook.

8 Q Okay. And what did you put into that  
9 green spiral notebook?

10 A Bad memories. Things that I've gone  
11 through, lots of things, you know. I can't tell you.  
12 There was a lot of pages. It was over 300 pages in  
13 that book.

14 Q Did you ever show that book to your  
15 lawyers?

16 A No.

17 Q Did you show that book to anyone?

18 A My husband.

19 Q Did you show it to anyone else besides  
20 your husband?

21 A No.

22 Q Did you tear out pages and give them to  
23 Sharon Churcher?

24 A No, I wrote -- those pages that you're  
25 talking about, I wrote for her specifically. She



1 wanted to know about the Prince Andrew incident.

2 Q So that's a different piece of paper?

3 A Yeah, that's just random paper.

4 Q So you had a green spiral notebook that  
5 you began sometime in 2011 or 2012 in which you wrote  
6 down your recollections about what had happened to  
7 you, and you burned that in a bonfire in 2013.

8 Did I get that right?

9 A You got that right.

10 Q And do you have no other names of people  
11 to whom you claim Ghislaine Maxwell directed you to  
12 have sex, correct?

13 A At this time, no.

14 Q Is there any document that would refresh  
15 your recollection that you could look at?

16 A If you have a document you'd like to show  
17 me, I would be glad to look at it and tell you the  
18 names I recognize off of that.

19 Q I'm just asking you if there's a document  
20 you know of that has this list of names in it?

21 A Not in front of me, no.

22 Q Where is the original of the photograph  
23 that has been widely circulated in the press of you  
24 with Prince Andrew?

25 A I probably still have it. It's not in my

1 possession right now.

2 Q Where is it?

3 A Probably in some storage boxes.

4 Q Where?

5 A In Sydney.

6 Q Where in Sydney?

7 A At some family's house. We got the boxes  
8 shipped to Australia, and they were picked up off the  
9 porch by my nephews and brought to their house.

10 Q Which is where?

11 A In Sydney.

12 Q Where in Sydney?

13 A [REDACTED]

14 Q And who lives in that house?

15 A Well, it's owned by my mother-in-law and  
16 father-in-law, but my nephews live in the house.

17 Q What are their names?

18 A I'm not giving you the names of my  
19 nephews.

20 Q What's the address of the house?

21 A Why would you want that?

22 Q I want to know where the photograph is.

23 I'm asking you where the photograph is. And you've  
24 just told me it's somewhere in [REDACTED]?

25 A Yes.

1 Q So where in [REDACTED] is the photograph  
2 located?

3 A If I can't 100 percent say that the  
4 photograph is there, it could be at my house that I  
5 presently live in. I'm not going to give you the  
6 address of my nephews' residence.

7 Q When is the last time you saw the  
8 photograph in person?

9 A When I packed and left America.

10 Q Colorado?

11 A Yes.

12 Q All right. So you had that photograph  
13 here with you in Colorado?

14 A Yes.

15 Q What's on the back of the photograph?

16 A I'm sorry?

17 Q Is there anything on the back of the  
18 photograph?

19 A There's like the date it was printed, but  
20 no writing or anything.

21 Q Okay. Does it say where it was printed?

22 A I don't believe so. I think it just -- I  
23 don't remember. I just remember there's a date on  
24 it.

25 Q Whose camera was it taken with?

1 A My little yellow Kodak camera.

2 Q Who took the picture?

3 A Jeffrey Epstein.

4 Q And where did you have it developed?

5 A I believe when I got back to America.

6 Q So where?

7 A I don't know.

8 Q Palm Beach?

9 A I don't know.

10 Q What is the date the photograph was  
11 printed?

12 A I believe it's in March 2001.

13 Q Okay.

14 A But that's just off of my photographic  
15 memory. I don't -- it could be different, but I  
16 think it's March 2001.

17 Q You have a photographic memory?

18 A I'm not saying I have a photographic  
19 memory. But if I'd look at the back of the photo and  
20 I remember what it says, I believe it was March 2001.

21 Q Did the photograph ever leave your  
22 possession for a while?

23 A I gave it to the FBI.

24 Q Okay. And when did you get it back?

25 A When they took copies of it.

1 Q When was that?

2 A 2011.

3 Q When they came to interview you?

4 A Yes.

5 Q So from 2011 until you left Colorado it  
6 was in your personal possession?

7 A Yes.

8 Q What other documents related to this case  
9 are in that, storage boxes in Australia?

10 MR. EDWARDS: Object to the form.

11 A Documents related to this case -- there --  
12 I don't know. I really can't tell you. I mean,  
13 there's seven boxes full of Nerf guns, my kids' toys,  
14 photos. I don't know what other documents would be  
15 in there.

16 Q (BY MS. MENNINGER) Did anyone search  
17 those documents after you received discovery requests  
18 from us in this case?

19 A I haven't been able to obtain those boxes.  
20 I can't get them sent back up to me. It's going to  
21 cost me a large amount of money. And right now I'm  
22 trying to look after my family, so I'm not able to  
23 afford to get them up.

24 Q You live in Australia, correct?

25 A I do.

1 read it.

2 MS. MENNINGER: We're going off the  
3 record.

4 MR. EDWARDS: Yeah, that's fine. She'll  
5 read.

6 THE VIDEOGRAPHER: That concludes today's  
7 proceedings. We're off the record at 5:28.

8 (Proceedings concluded at 5:28 p.m.)

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