

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

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****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.

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MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026



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APPEARANCES:

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LAURA A. MENNINGER, ESQUIRE

Also Present:
James Christe, videographer

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2 A. She was tasked to answer
3 telephones.

4 Q. Did you ever ask her to rub
5 Jeffrey's feet?

6 MR. PAGLIUCA: Objection to the
7 form and foundation.

8 A. I believe that I have read that,
9 but I don't have any memory of it.

10 Q. Did you ever tell Johanna that she
11 would get extra money if she provided Jeffrey
12 massages?

13 A. I was always happy to give career
14 advice to people and I think that becoming
15 somebody in the healthcare profession, either
16 exercise instructor or nutritionist or
17 professional massage therapist is an
18 excellent job opportunity. Hourly wages are
19 around 7, 8, \$9 and as a professional
20 healthcare provider you can earn somewhere
21 between as we have established 100 to \$200
22 and to be able to travel and have a job that
23 pays that is a wonderful job opportunity. So
24 in the context of advising people for
25 opportunities for work, it is possible that I

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2 would have said that she should explore that
3 as an option.

4 Q. Did you tell her she would get
5 extra money if she massaged Jeffrey?

6 A. I'm just saying, I cannot recall
7 the exact conversation. I give career advice
8 and I have done that.

9 Q. Did you ever have Johanna massage
10 you?

11 A. I did.

12 Q. How many times?

13 A. I don't recall how many times.

14 Q. Was there sex involved?

15 A. No.

16 Q. Did you ever instruct Johanna to
17 massage Glenn Dubin?

18 A. I don't believe -- I have no
19 recollection of it.

20 Q. Did you ever have sexual contact
21 with Johanna?

22 MR. PAGLIUCA: Object to the form
23 and foundation. You need to give me an
24 opportunity to get in between the
25 questions.

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2 Anything that involves consensual
3 sex on your part, I'm instructing you
4 not to answer.

5 Q. Did you ever have sexual contact
6 with Johanna?

7 A. Again, she is an adult --

8 Q. I'm asking you, did you ever have
9 sexual contact with Johanna?

10 A. I've just been instructed not to
11 answer.

12 Q. On what basis?

13 A. You have to ask my lawyer.

14 Q. Did you ever have sexual contact
15 with Johanna that was not consensual on
16 Johanna's part?

17 MR. PAGLIUCA: You can answer
18 nonconsensual.

19 A. I've never had nonconsensual sex
20 with anybody.

21 Q. Not Annie Farmer?

22 MR. PAGLIUCA: Objection.

23 A. I just testified I never had
24 nonconsensual sex with anybody ever, at any
25 time, at anyplace, at any time, with anybody.