

EXHIBIT 3
(File 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]
2 know the extent of their relationship. But she
3 would schedule his appointments and handle clerical
4 things for him as far as I can see.

5 Q. All right.

6 And when you first went to his house,
7 where did -- where were you taken within the house?

8 MR. PAGLIUCA: Object to form and
9 foundation.

10 THE WITNESS: Kitchen, up to the room, up
11 to his master suite.

12 BY MR. EDWARDS:

13 Q. And which stairwell did you go up to his
14 suite?

15 A. I do not remember.

16 Q. Was it the stairs off by the kitchen?

17 A. I do not recall.

18 Q. And when you went into his bedroom, were
19 you under the belief that it was going to be you
20 providing some sort of a massage?

21 A. It certainly didn't involve any sexual
22 activity. That's what I was under the assumption.
23 I don't recall exactly how I was propositioned to
24 get there. I just was there, and all of a sudden
25 something horrible happened to me.

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2 Q. Did you, at 16 years old or 17 years old,
3 have any massage training or experience?

4 A. No.

5 Q. Did [REDACTED] have any massage
6 experience?

7 A. I do not -- I can't speak to her
8 experience. I do not know. She was not really a
9 friend of mine. Barely an acquaintance. We maybe
10 spoke three times in our entire going to school
11 together and everything.

12 Q. Did you ever learn what her incentive was
13 to bring you to Jeffrey Epstein's house?

14 A. Later I found out that they would get
15 kickbacks for bringing people over.

16 Q. Do you remember seeing Jeffrey Epstein
17 give her money that day?

18 A. I don't recall, no.

19 Q. If you said that in your statement, that
20 you remember [REDACTED] getting money for bringing you
21 here that day, would that be a true statement?

22 A. Yes, absolutely. Everything in there is
23 the truth. I do not remember from years ago at this
24 point.

25 MR. PAGLIUCA: Object to form and

1

2 into?

3 A. I worked very, very hard to not recall
4 anything specific about my sexual encounters with
5 this person as one of his victims. I cannot answer
6 your question. Things -- it wasn't supposed to be
7 sexual, but it was. That's as specific as I can
8 get.

9 Q. Fair to say that when Jeffrey Epstein or
10 his assistants used the term "massage," someone is
11 going to come give a massage, that that's always a
12 sexual encounter?

13 MR. PAGLIUCA: Object to form and
14 foundation.

15 THE WITNESS: "Always" is a strong word to
16 use. I'm not making that assumption, but
17 oftentimes that's exactly what it meant.

18 BY MR. EDWARDS:

19 Q. When Jeffrey Epstein was paying high
20 school girls for these alleged massages, he was
21 paying to turn it into a sexual encounter, fair?

22 MR. PAGLIUCA: Object to form and
23 foundation.

24 THE WITNESS: I would say yes, that is the
25 motivation. I'm not a mind-reader. I don't

1

2 know what he was thinking. It's fair to
3 assume.

4 BY MR. EDWARDS:

5 Q. All right.

6 Did you know how [REDACTED] met
7 Jeffrey Epstein?

8 A. No.

9 Q. Do you know someone named Hayley Robson?

10 A. No.

11 Q. Did you know Tony Figueroa?

12 A. No. It sounds like a familiar name, but I
13 do not know him.

14 Q. Did you know Ashley Davis?

15 A. I may have gone to high school with an
16 Ashley Davis, but that seems like a very common
17 name.

18 Q. Were you asked by Jeffrey Epstein to bring
19 other girls to him?

20 A. Yes.

21 Q. And for what purpose?

22 MR. PAGLIUCA: Object to form and
23 foundation.

24 BY MR. EDWARDS:

25 Q. What is his stated purpose?

1

[REDACTED]

2

A. I was never present when he interacted
3 with those women. I don't know exactly what
4 happened.

5

Q. Did you bring other girls to him?

6

A. Yes. I brought friends over.

7

Q. And were they also of similar age to you?

8

A. Yes. They were my peers.

9

Q. High school girls?

10

A. Correct.

11

Q. Did any of them have massage experience?

12

A. I do not know.

13

MR. PAGLIUCA: Object to form.

14

BY MR. EDWARDS:

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Q. Were you going out to look for a massage
16 therapist, a professional massage therapist to bring
17 to him?

18

A. No.

19

Q. What he wanted at his house was young high
20 school girls under the pretense of some massage?

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MR. PAGLIUCA: Object to form and

22

foundation.

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BY MR. EDWARDS

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Q. Is that fair?

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MR. PAGLIUCA: Object to form and

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[REDACTED]

foundation.

THE WITNESS: Yes, that's fair. I mean, I have to think. Sometimes I would go over and I would just swim and I would get paid, or I would take a nap and I'd get paid, or I would just hang out and I'd get paid. So that should be in my statement as well.

It wasn't my assumption that they were coming over to do anything. I did not know, once the door was closed or once they went to another area of the home. I often just went over and did my own thing while they were doing whatever they were doing. It was none of my business.

BY MR. EDWARDS:

Q. When you would say you would just hang out at the pool, who would you be with?

A. I don't remember anyone. None of those girls were any friends. We were all there just through that mutual connection.

Q. I just have a list of girls, and I want you to tell me whether you know who they are or you don't.

Do you know Felicia Esposito?

1

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

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?

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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

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2 Epstein?

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MR. PAGLIUCA: Object to form and
foundation.

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THE WITNESS: Yes.

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MR. EDWARDS: All right. I don't have
anything further for you. I apologize that we
even had to go through this, all right?

9

THE WITNESS: Okay.

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E X A M I N A T I O N

11

BY MR. PAGLIUCA:

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Q. [REDACTED] by name is Jeff Pagluica. I
live in Denver, Colorado. And, like you, I don't
want to be here today either, okay? I would rather
be in Denver.

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I just want to -- as I understand it, and
I'm not trying to get into any of your treatment
over the last, let's say, 10 years, because I don't
know how long it's been, but as I understand what
you and your lawyer have said here today, you have
been involved in some number of years of therapy, in
which the purpose -- part of the purpose of the
therapy has been to forget all of these events that
Mr. Edwards was asking you questions about; is that
correct?

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[REDACTED]

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify that
[REDACTED] personally appeared before me and
was duly sworn.

WITNESS my hand and official seal this
23rd day of June, 2016.

Kelli Ann Willis, RPR, CRR
Notary Public, State of Florida
Commission FF928291, Expires 2-16-20

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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 [REDACTED] 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 23rd day of June, 2016.

KELLI ANN WILLIS, RPR, CRR