

EXHIBIT 4
(File Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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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 RE CAREY - 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 RE CAREY - CONFIDENTIAL

2 THE WITNESS: No.

3 BY MR. EDWARDS:

4 Q. Okay. The one with massage experience was
5 older?

6 MR. PAGLIUCA: Object to form and
7 foundation.

8 THE WITNESS: Correct.

9 BY MR. EDWARDS:

10 Q. The remainder of the 30 girls that went to
11 this house for the purposes of massage or recruited
12 for massage, is it my understanding that they had no
13 massage experience?

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

16 THE WITNESS: That's correct.

17 BY MR. EDWARDS:

18 Q. And were the majority of those girls that
19 you interviewed over or under the age of 18?

20 MR. PAGLIUCA: Object to form and
21 foundation.

22 THE WITNESS: The majority were under.

23 BY MR. EDWARDS:

24 Q. And how was it that Mr. Epstein gained
25 access to that number of underaged girls?

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2 MR. PAGLIUCA: Object to form and
3 foundation.

4 THE WITNESS: Each of the victims that
5 went to the home were asked to bring their
6 friends to the home. Some complied and some
7 didn't.

8 BY MR. EDWARDS:

9 Q. Okay. So the victim would come to the
10 home and could give a massage and get paid for it;
11 is that right?

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

14 THE WITNESS: Correct.

15 BY MR. EDWARDS:

16 Q. And at the end of that massage, if that
17 victim brought other friends, she would get paid for
18 the recruitment of those friends?

19 MR. PAGLIUCA: Object to form and
20 foundation.

21 THE WITNESS: Correct.

22 BY MR. EDWARDS:

23 Q. Additionally, did your investigation
24 reveal that the assistants of Jeffrey Epstein would
25 call and set up for these girls to come over to the

1 JOSEPH RECAREY - CONFIDENTIAL

2 house for the massages?

3 MR. PAGLIUCA: Object to form and
4 foundation.

5 THE WITNESS: Correct.

6 BY MR. EDWARDS:

7 Q. And, as well, certain people that were
8 friends or girlfriends or assistants of Jeffrey
9 Epstein would recruit girls under the pretense of
10 giving a massage?

11 MR. PAGLIUCA: Object to form and
12 foundation.

13 THE WITNESS: Correct.

14 BY MR. EDWARDS:

15 Q. Is that what your investigation revealed
16 in terms of the system of getting these girls over
17 to the house?

18 MR. PAGLIUCA: Object to form and
19 foundation.

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. Okay. Talking about the massages, when --
23 when these -- the various girls that you interviewed
24 described the massages, was there a pattern of what
25 occurred during these massages?

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2 MR. PAGLIUCA: Object to form and
3 foundation.

4 THE WITNESS: Yes, there was.

5 BY MR. EDWARDS:

6 Q. Okay. Describe for us what the pattern
7 was that was told to you by the 30 or so girls that
8 you interviewed?

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

11 THE WITNESS: Initially, when the -- when
12 the victims would come into the home and were
13 brought upstairs to provide the massage,
14 Epstein would lay on his massage table, where
15 they would start to rub his back and the back
16 of his legs.

17 Epstein would either attempt to fondle the
18 girls or touch the girls inappropriately, and
19 at which point he would masturbate. And when
20 he was done, he would get up and go wash off
21 while the girls would get dressed and go back
22 downstairs and get paid.

23 BY MR. EDWARDS:

24 Q. Okay. So did you determine that "massage"
25 was actually a code word for something else?

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2 MR. PAGLIUCA: Object to form and
3 foundation.

4 THE WITNESS: When they went to perform a
5 massage, it was for sexual gratification.

6 BY MR. EDWARDS:

7 Q. And when the assistants would call and ask
8 these girls to work, did you learn what the term
9 "work" meant with respect to these girls coming to
10 the house?

11 MR. PAGLIUCA: Object to form and
12 foundation.

13 THE WITNESS: "Work" meant to come and
14 provide Epstein a massage.

15 BY MR. EDWARDS:

16 Q. And massage -- how often would these
17 massages, based upon your investigation, turn into
18 something sexual?

19 MR. PAGLIUCA: Object to form and
20 foundation.

21 THE WITNESS: During the investigation, it
22 was determined that he would have multiple
23 massages during the day. He would have some in
24 the morning and some in the afternoon,
25 sometimes into the evening. So he would

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2 BY MR. EDWARDS:

3 Q. All right.

4 And so when you went to speak with the
5 victims, what did these victims say about their
6 experience with Jeffrey Epstein?

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

9 THE WITNESS: Once they were recruited,
10 they were brought to the home. They were to
11 provide a massage.

12 Some of the victims did not want to be
13 touched; some of the victims did not want to
14 partake in that. So it was -- I believe for --
15 for a couple of them it was only a one-shot
16 deal, but others continued to come.

17 BY MR. EDWARDS:

18 Q. Okay. And as you interviewed some of
19 those victims, did you learn that some of those
20 victims also brought additional girls?

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

23 THE WITNESS: That's correct.

24 BY MR. EDWARDS:

25 Q. So as you were investigating this case, as

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2 part of your investigation, you're learning
3 information from these victims and then going to
4 talk to the next person down the line, if you will?

5 MR. PAGLIUCA: Object to form and
6 foundation.

7 THE WITNESS: Correct.

8 BY MR. EDWARDS:

9 Q. And what is the purpose of that?

10 A. To identify further victims and acquire
11 additional information.

12 Q. And in doing that, were you able to
13 corroborate the accuracy of what the first victim
14 told you?

15 MR. PAGLIUCA: Object to form and
16 foundation.

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

19 Q. Okay. And did you learn of Sarah Kellen's
20 involvement with respect to the various girls?

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

23 THE WITNESS: Yes.

24 BY MR. EDWARDS:

25 Q. What was her role?

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2 MR. PAGLIUCA: Object to form and
3 foundation.

4 THE WITNESS: That is correct.

5 BY MR. EDWARDS:

6 Q. And did you turn all of your files over to
7 either the State Attorney's Office or the FBI?

8 A. That is correct.

9 Q. And through the State Attorney's Office,
10 was the information contained within the probable
11 cause affidavit and the incident reports a publicly
12 available document?

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

15 THE WITNESS: Yes.

16 BY MR. EDWARDS:

17 Q. And around the time of your
18 investigation -- around the time you ended your
19 investigation and thereafter, were various newspaper
20 articles written about the substance of some of your
21 investigation?

22 A. Yes.

23 Q. Did it become well known to the public
24 that Jeffrey Epstein had recruited high school girls
25 to his house for the purpose of some sexually

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2 involved massage?

3 MR. PAGLIUCA: Object to form and
4 foundation.

5 THE WITNESS: That is correct.

6 BY MR. EDWARDS:

7 Q. And, in fact, haven't you read many of
8 these newspaper articles?

9 A. That is correct.

10 Q. That was not a hidden secret from the
11 public beginning in 2006, right?

12 A. No.

13 Q. And from your overall investigation, kind
14 of just a big picture, what was the criminal
15 activity, as specific as you can, that you learned
16 that Jeffrey Epstein and others were involved in?

17 MR. PAGLIUCA: Object to form and
18 foundation.

19 THE WITNESS: It was sexual battery and
20 lewd and lascivious conduct for under the age
21 of 16.

22 BY MR. EDWARDS:

23 Q. And what was the specific system of
24 engaging in this type of activity?

25 MR. PAGLIUCA: Object to form and

1 JOSEPH RECAREY - CONFIDENTIAL

2 foundation.

3 THE WITNESS: As to --

4 BY MR. EDWARDS:

5 Q. From the recruitment to the: How did you
6 get them, what did you do, how did you keep it
7 going?

8 A. Once the --

9 MR. PAGLIUCA: Object to form and
10 foundation. Sorry.

11 THE WITNESS: No, no.

12 As it became known to us that the victim
13 was recruited, brought to the home, provided
14 the massage, was paid, whether there was
15 inappropriate touching, whether there was
16 sexual activity, whether there was actually
17 intercourse, all of that was documented and was
18 asked whether they brought anyone to the home,
19 whether they had any formal training in massage
20 therapy, and once -- once additional victims
21 were identified, we continued the same -- the
22 same method of investigation.

23 BY MR. EDWARDS:

24 Q. Okay. And one of the earliest victims, in
25 terms of the chronology of this pyramid of girls,

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2 for lack a better word -- you understand what I mean
3 by that, right?

4 MR. PAGLIUCA: Object to form and
5 foundation.

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. That there's -- there's -- one of the
9 earliest victims that you interviewed was Haley
10 Robson; is that right?

11 MR. PAGLIUCA: Object to form and
12 foundation.

13 THE WITNESS: It was actually SG, I think
14 was the first one that was interviewed, and
15 then HR was the one I interviewed.

16 BY MR. EDWARDS:

17 Q. Okay. My question was bad.

18 I know that the first person interviewed
19 that kind of kicked off the investigation was SG,
20 but -- and just to create a picture of what we have
21 here, this is, and tell me if I characterized it
22 wrong, a scheme that Jeffrey Epstein engaged in by
23 using assistants to recruit girls, right?

24 A. Correct.

25 Q. Under the --

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2 MR. PAGLIUCA: Object to form and
3 foundation.

4 BY MR. EDWARDS:

5 Q. Under the pretense of giving a massage?

6 MR. PAGLIUCA: Object to form and
7 foundation.

8 THE WITNESS: Correct. Either a message
9 and/or become a model for Victoria's Secrets
10 and/or connections.

11 BY MR. EDWARDS:

12 Q. And when he was able to get these girls to
13 his home, he would then offer them money to also
14 become recruiters for him?

15 MR. PAGLIUCA: Object to form and
16 foundation.

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

19 Q. And that created this -- if you've mapped
20 it out, kind of a spider web or a pyramid of girls
21 bringing girls to Jeffrey Epstein's house?

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

24 BY MR. EDWARDS:

25 Q. Right?

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2 A. Correct.

3 Q. All right.

4 So when I say one of the first, I mean on
5 the top of the pyramid one of the earliest people
6 that you interviewed that brought girls to Jeffrey
7 Epstein's house was HR?

8 A. Correct.

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

11 BY MR. EDWARDS:

12 Q. And I think that you testified that Molly
13 and Tony drove HR to Jeffrey Epstein's house the
14 first time, right?

15 MR. PAGLIUCA: Object to form and
16 foundation.

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

19 Q. Did you ever trace all the way up to the
20 highest level to determine who was it that started
21 this particular chain of Palm Beach girls coming
22 over to Jeffrey Epstein's home?

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

25 THE WITNESS: I did not. Basically, when

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AFFIDAVIT

STATE OF FLORIDA)
COUNTY OF)

I, _____, being first
duly sworn, do hereby acknowledge that I did
read a true and certified copy of my deposition
which was taken in the case of GIUFFRE V.
MAXWELL, taken on the 24th day of September,
2016, and the corrections I desire to make are
as indicated on the attached Errata Sheet.

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF)

Before me personally appeared

_____,
to me well known / known to me to be the
person described in and who executed the
foregoing instrument and acknowledged to and
before me that he executed the said instrument
in the capacity and for the purpose therein
expressed.

Witness my hand and official seal, this
_____ day of _____, _____.

(Notary Public)

My Commission Expires: