COMPOSITE

EXHIBIT 1

(File Under Seal)

Page 1

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.

May 18, 2016 9:04 a.m.

CONFIDENTIAL

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.



Page 30 0. Did you observe her to be young when you 1 met her? 2 MS. MENNINGER: Objection, vague as to 3 time. THE WITNESS: All of the women were generally young. I did not know the ages of really anyone, so... BY MS. McCAWLEY: Q. How many massages did Jeffrey receive on 10 average in a given day? MS. MENNINGER: Objection, foundation. 11 THE WITNESS: Three a day. 12 BY MS. McCAWLEY: 13 Q. Let me back up for a moment. 14 How long did you work for Jeffrey and 15 Ghislaine? 16 MS. MENNINGER: Objection, leading and 17 foundation. 18 THE WITNESS: I believe it was five years, 19 2001 to 2006. 20 BY MS. McCAWLEY: 21 Q. And how many massages did Epstein receive 22 23 per day on average? MS. MENNINGER: Objection, foundation. 24 25 THE WITNESS: Three.



Page 32 1 to object and then you can still answer. one is going to stop you from answering. 2 just need to get the objection on the record, 3 in the same way she needs to be able to talk before you. My apologies. I'm not trying to cut you off, but I am supposed to get it in before you answer. 7 BY MS. McCAWLEY: 8 Did Jeffrey ever tell you why he received 9 so many massages from so many different girls? 10 MS. MENNINGER: Objection, hearsay. 11 BY MS. McCAWLEY: 12 13 0. You can answer. He explained to me that, in his opinion, 14 he needed to have three orgasms a day. It was 15 biological, like eating. 16 And what was your reaction to that 17 statement? 18 I thought it was a little crazy. Α. 19 And what did -- do you recall what -- when 20 0. you observed the other females giving massages, do 21 you recall what they would dress like? Did they 22 wear scrubs or did they typically wear normal 23 clothes? 24 Normal clothes. 25 A.



Page 34 camera? 1 MS MENNINGER: Objection, leading. 2 THE WITNESS: Yes. 3 BY MS. McCAWLEY: Was there anything you were supposed to do 5 in order to get the camera? 6 MS. MENNINGER: Objection, leading. THE WITNESS: I did not know that there 8 were expectations of me to get the camera until 9 after. She had purchased the camera for me, 10 and I was over there giving Jeffrey a massage. 11 I did not know that she was in possession of 12 the camera until later. 13 She told me -- called me after I had left 14 and said, I have the camera for you, but you 15 cannot receive it yet because you came here and 16 didn't finish your job and I had to finish it 17 for you. 18 BY MS. McCAWLEY: 19 And did you -- what did you understand her 20 Q. to mean? 21 She was implying that I did not get 22 Jeffrey off, and so she had to do it. 23 And when you say "get Jeffrey off," do you 24 mean bring him to orgasm? 25



Page 35 A. Yes. 1 Did Ghislaine ever describe to you what 0. 2 types of girls Jeffrey liked? Model types. Α. Did Ghislaine ever talk to you about how 0. 5 you should act around Jeffrey? She just had a conversation with me that I A. 7 should always act grateful. Did Jeffrey ever tell you that he took a 9 girl's virginity? 10 He did not tell me. He told a friend of A 11 12 mine. And what do you recall about that? 13 Q. MS. MENNINGER: Objection, hearsay, 14 foundation. 15 THE WITNESS: He wanted to have a friend 16 of mine come out who was cardio-kickboxer 17 instructor. She was a physical trainer. 18 And so I brought her over to the house, 19 and he told my friend Rachel that -- he said, 20 You see that girl over there laying by the 21 pool? She was 19. And he said, I just took 22 her virginity. And my friend Rachel was 23 mortified. 24



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- 1 exposed her bra, and she grabbed it and pulled it
- 2 down.
- 3 Q. Anything else?
- 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?
- MS. MENNINGER: Objection, leading, form.
- 22 BY MS. McCAWLEY:
- Q. I'm sorry, Johanna, let me correct that
- 24 question.
- 25 What did you understand Maxwell to mean



Page 143 when she said you hadn't finished the job, with 1 respect to the camera? 2 MS. MENNINGER: Objection, leading, form. 3 THE WITNESS: She implied that I had not brought him to orgasm. 5 BY MS. McCAWLEY: 6 So is it fair to say that Maxwell expected you to perform sexual acts when you were massaging Jeffrey? 9 MS. MENNINGER: Objection, leading, form, 10 foundation. 11 THE WITNESS: I can answer? 12 Yes, I took that conversation to mean that 13 is what was expected of me. 14 BY MS. McCAWLEY: 15 And then you mentioned, I believe, when 16 you were testifying earlier that Jeffrey told you a 17 story about sex on the plane. What was that about? 18 MS. MENNINGER: Objection, hearsay. 19 THE WITNESS: He told me one time Emmy was 20 sleeping on the plane, and they were getting 21 ready to land. And he went and woke her up, 22 and she thought that meant he wanted a blow 23 job, so she started to unzip his pants, and he 24 said, No, no, no, you just have to be awake for 25



	Page 157
1	AFFIDAVIT
2	STATE OF FLORIDA)
	COUNTY OF)
3	
4	
	I, , being first
5	duly sworn, do hereby acknowledge that I did
	read a true and certified copy of my deposition
6	which was taken in the case of GIUFFRE V.
	MAXWELL, taken on the 18th day of May, 2016,
7	and the corrections I desire to make are as
	indicated on the attached Errata Sheet
8	
9	CERTIFICATE
10	
11	STATE OF FLORIDA)
	COUNTY OF)
12	
13	
	Before me personally appeared
14	
000	to me well known / known to me to be the
15	person described in and who executed the
	foregoing instrument and acknowledged to and
16	before me that he executed the said instrument
3-30m	in the capacity and for the purpose therein
17	expressed.
18	
19	Witness my hand and official seal, this
	day of
20	
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44	(Notary Public)
23	,—————————————————————————————————————
24	My Commission Expires:
25	A A TO THE STREET OF THE STREE

