

# **EXHIBIT F**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,  
Plaintiff,

v.

GHISLAINE MAXWELL,  
Defendant.

\_\_\_\_\_ /

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.  
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company  
B. Paul Katz Professional Center  
(SunTrust Building)  
One Florida Park Drive South  
Suite 214  
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR  
Florida Professional Reporter  
Court Reporter and Notary Public

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1 Q Do you know her name?

2 A I think it was Carolyn -- Caroline,  
3 Carolyn -- I don't know -- something like that.

4 Q Did Jeffrey call you directly about  
5 getting more girls?

6 A Yes.

7 Q On the phone?

8 A Uh-huh (affirmative).

9 Q What did he say?

10 A He was just asking me if I had any other  
11 girls that wanted to come work.

12 Q Okay. Is that the term that he used?

13 A Yeah.

14 Q And did he pay -- he paid you personally?

15 A Yeah. He handed me \$200 for every girl  
16 that I walked in that door, whether they did stuff  
17 with him or not.

18 Q In cash?

19 A Cash.

20 Q Did you ever get paid by Ms. Maxwell for  
21 that?

22 A No.

23 Q Did you ever bring a girl to Ms. Maxwell?

24 A No.

25 Q Did Ms. Maxwell ever call you and ask you

1 to bring a girl to her?

2 A No.

3 Q Did Ms. Maxwell ever call you and ask you  
4 to bring a girl to Jeffrey?

5 A No.

6 Q All right. Approximately what period of  
7 time were you doing this bringing of girls?

8 A I'd say probably, like, about six months  
9 before she left. Because mainly, like I said, I  
10 mean, she would get them with Ms. Maxwell or whoever  
11 else. And whenever we were around, like I said, I  
12 would find friends that I went to school with or  
13 whatever that were willing to go there, so...

14 Q I'm sorry. What did you start that  
15 sentence with? She would get them from Ms. Maxwell?

16 A No. Her and Ms. Maxwell would go get them  
17 for him.

18 Q Did you see Virginia with Ms. Maxwell  
19 at --

20 A I had never. Like I said, aside from  
21 going to the mansion, I had never went out with them  
22 anywhere. I've never been out to clubbing with  
23 them. I've never been to New York or anything. I  
24 never went on any trips with them. So anything that  
25 happened, I was not there for, so...

1       happen, so...

2               Q       Well, you said you observed bringing a  
3       girl over.

4               A       No. I'm just saying -- like, I brought  
5       them over, yes. But I have never observed anything,  
6       like, sexual. Never anything --

7               Q       Okay.

8               A       -- like to where it would be an illegal  
9       activity. Like, any time I was there, everybody was  
10       dressed. They were all talking like it was just,  
11       like, people hanging out in a room, you know what I  
12       mean? There was never anything going on when I was  
13       there, so...

14              Q       Do you have any personal knowledge as to  
15       whether anything other than a massage took place  
16       between Jeffrey and these girls?

17                      MR. EDWARDS: Form.

18              A       No.

19       BY MS. MENNINGER:

20              Q       You did not see anything?

21              A       Nope.

22              Q       They didn't tell you afterwards anything  
23       happened?

24              A       Nope. Like I said, the only people  
25       with -- some would ask to go back; some wouldn't.

1 Q Right?

2 A Yes.

3 Q But you did not observe that?

4 A No.

5 Q Ms. Roberts described sexual acts that she  
6 participated in with Jeffrey; correct?

7 A Yes.

8 Q And you did not observe that?

9 A No.

10 Q Ms. Roberts described sexual acts she  
11 participated in with Ms. Maxwell; correct?

12 A Yes.

13 Q You did not observe that?

14 A No.

15 Q When you saw Ms. Roberts and Ms. Maxwell  
16 in the same room, was there anything sexual going on  
17 between them?

18 A No.

19 Q How much money did you see Ms. Roberts  
20 possessing at any given time?

21 A I mean, it could of -- up to a couple  
22 thousand at a time to, like, just a few hundreds at  
23 a time. I mean, it was never like, overly amounts.  
24 Like, not like \$10,000, \$20,000, nothing like that.  
25 But, I mean, it was every time she would come back,

1 Q It pays better than the vet office?

2 A Yeah.

3 MR. EDWARDS: Object to the form.

4 BY MS. MENNINGER:

5 Q The information about other girls going  
6 back to Jeffrey without you was information you  
7 heard thirdhand --

8 A Yes.

9 Q -- correct?

10 Did you have conversations with these  
11 girls about their ages?

12 A The ones that I took?

13 Q The two, [REDACTED] and Carolyn.

14 A No. They were my age. That's what I'm  
15 saying, they were literally at -- at most, like, a  
16 year younger than me.

17 Q The girls that you were in the car when  
18 Virginia took --

19 A Those, I did not even ask.

20 Q You did not ask?

21 A No.

22 Q Did you hear her discussing anything about  
23 age with them?

24 A No.

25 Q Did you hear them discussing you have to