

# EXHIBIT 6

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - X

**\*\*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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BY: JEFFREY S. PAGLIUCA, ESQUIRE  
LAURA A. MENNINGER, ESQUIRE

Also Present:  
James Christe, videographer

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2 for sexual acts.

3 Q. I'm asking if they performed sexual  
4 acts?

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

7 Q. Did any of the massage therapists  
8 who were at the home perform sexual acts for  
9 Jeffrey Epstein?

10 A. I don't know what you mean by  
11 sexual acts.

12 Q. Did any of the massage therapists  
13 who were working at the home perform sexual  
14 acts, including touching the breasts,  
15 touching the vaginal area, being touched  
16 while Jeffrey is masturbating, having  
17 intercourse, any of those things?

18 MR. PAGLIUCA: Objection. Form and  
19 foundation.

20 To the extent any of this is asking  
21 for to your knowledge any consensual sex  
22 act that may or may not have involved  
23 you, I'm instructing you not to answer  
24 the question.

25 Q. I'm not asking about consensual sex

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2 acts. I'm asking whether any of the massage  
3 therapists performed sexual acts for Mr.  
4 Epstein, as I have just described?

5 A. I have never seen anybody have  
6 sexual intercourse with with Jeffrey, ever.

7 Q. I'm not asking about sexual  
8 intercourse. I'm asking about any sexual  
9 act, touching of the breast -- did you ever  
10 see -- can you read back the question?

11 (Record read.)

12 A. I'm not addressing any questions  
13 about consensual adult sex. If you want to  
14 talk about what the subject matter, which is  
15 defamation and lying, Virginia Roberts, that  
16 you and Virginia Roberts are participating in  
17 perpetrating her lies, I'm happy to address  
18 those. I never saw any inappropriate  
19 underage activities with Jeffrey ever.

20 Q. I'm not asking about underage. I'm  
21 asking about whether any of the masseuses  
22 that were at the home perform sexual acts for  
23 Jeffrey Epstein?

24 A. I have just answered the question.

25 Q. No, you haven't.

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2 A. I have.

3 Q. No, you haven't.

4 A. Yes, I have.

5 Q. You are refusing to answer the  
6 question.

7 A. Let's move on.

8 Q. I'm in charge of the deposition. I  
9 say when we move on and when we don't.

10 You are here to respond to my  
11 questions. If you are refusing to answer the  
12 court will bring you back for another  
13 deposition to answer these questions.

14 Do you understand that?

15 MR. PAGLIUCA: You don't need to  
16 threaten the witness.

17 MS. McCAWLEY: I'm not threatening  
18 her. I'm making sure the record is  
19 clear.

20 MR. PAGLIUCA: Certainly can you  
21 apply to have someone come back and the  
22 court may or may not have her come back  
23 again.

24 Again, she is not answering  
25 questions that relate to adult consent



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2 sex acts. Period. And that's the  
3 instruction and we can take it up with  
4 the court.

5 Q. Ms. Maxwell, are you aware of any  
6 sexual acts with masseuses and Jeffrey  
7 Epstein that were nonconsensual?

8 A. No.

9 Q. How do you know that?

10 A. All the time that I have been in  
11 the house I have never seen, heard, nor  
12 witnessed, nor have reported to me that any  
13 activities took place, that people were in  
14 distress, either reported to me by the staff  
15 or anyone else. I base my answer based on  
16 that.

17 Q. Are you familiar with a person by  
18 the name of [REDACTED]

19 A. I am.

20 Q. Has [REDACTED] given a statement  
21 to police about you performing sexual acts on  
22 her?

23 A. I have not heard that.

24 Q. Has [REDACTED] given a statement  
25 to police about Jeffrey Epstein performing

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2 Q. Did you have sex with her?

3 MR. PAGLIUCA: This is the same  
4 instruction about consensual or  
5 nonconsensual.

6 Q. Was [REDACTED] under the age of 18 when  
7 you hired her?

8 A. No. I didn't hire her, as I said,  
9 Jeffrey did.

10 Q. Did [REDACTED] ever have sex with  
11 Jeffrey?

12 MR. PAGLIUCA: Objection to the  
13 form and foundation.

14 A. How would I know what somebody else  
15 did.

16 Q. You weren't involved in the sex  
17 between Jeffrey, [REDACTED] and yourself?

18 A. We already --

19 Q. Were you involved with sex between  
20 Jeffrey, [REDACTED] and yourself?

21 MR. PAGLIUCA: Everyone is talking  
22 over each other. You heard the  
23 question.

24 Again, you you know what the  
25 instruction is. If there is any



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2 consensual issue involved, I instruct  
3 you not to answer.

4 A. Moving on.

5 Q. So you are refusing to answer that  
6 question?

7 A. I've been instructed by my lawyer.

8 Q. Did you ever have sex with Jeffrey,  
9 [REDACTED] Virginia and yourself when Virginia was  
10 underage?

11 A. Absolutely not.

12 MR. PAGLIUCA: We've been going for  
13 about an hour. I would like to take a  
14 five-minute break, please.

15 MS. McCAWLEY: I'm almost done.

16 MR. PAGLIUCA: You are not going to  
17 allow a break.

18 MS. McCAWLEY: As soon as I get  
19 through my line of questioning, which is  
20 perfectly appropriate.

21 Q. Did [REDACTED] travel with you and  
22 Jeffrey to Europe?

23 A. I'm sure she did.

24 Q. What is she doing today?

25 A. I have no idea.

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2 Q. Did you train Virginia on how to  
3 recruit other girls to perform sexual  
4 massages?

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

7 A. No. And it's absurd and her entire  
8 story is one giant tissue of lies and  
9 furthermore, she herself has -- if she says  
10 that, you have to ask her about what she did.

11 Q. Does Jeffrey like to have his  
12 nipples pinched during sexual encounters?

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

15 A. I'm not referring to any advice on  
16 my counsel. I'm not talking about any adult  
17 sexual things when I was with him.

18 Q. When Jeffrey would have a massage,  
19 would he request that the masseuse pinch his  
20 nipples while he was having a massage?

21 A. I'm not talking about anything with  
22 consensual adult situation.

23 Q. What about with underage --

24 A. I am not aware of anything.

25 Q. You are not aware of Jeffrey

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2 Q. In your responsibilities in working  
3 for Jeffrey, would you book massages for him  
4 on any given day so that he would have a  
5 massage scheduled? Would you take a call for  
6 example and book a massage for him?

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

9 Q. You can answer.

10 A. Typically, that was not my  
11 responsibility. He would either book the  
12 massage himself or one of his other  
13 assistants would do that.

14 Q. From time to time you had to do  
15 that?

16 MR. PAGLIUCA: Objection to the  
17 form and foundation.

18 A. Like I said, typically it was  
19 somebody else's responsibility.

20 Q. If you were unable to book a girl  
21 for a massage on a given day, would that mean  
22 that you were responsible for giving him a  
23 sexual massage?

24 MR. PAGLIUCA: Objection to the  
25 form and foundation and I instruct you

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2 not to answer any questions about any of  
3 your consensual adult sexual activity.

4 Q. So you are not going to answer that  
5 question?

6 A. You just heard my counsel.

7 Q. Have you ever said to anybody that  
8 recruiting other girls to perform sexual  
9 massages for Jeffrey Epstein takes the  
10 pressure off you?

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

13 A. Repeat the question and break it  
14 out.

15 Q. Have you ever said to anybody that  
16 you recruit girls --

17 A. Stop right there. I never  
18 recruited girls, let's stop there. Now  
19 breakdown the question.

20 Q. Have you ever said to anybody --

21 A. By girls, we are talking about  
22 underage people -- you said girls, are you  
23 talking about underage -- we are not talking  
24 about consensual acts -- this is a defamation  
25 suit.

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2 the flights?

3 A. I can't recollect having a meal  
4 with them, but just so we are clear, the  
5 allegations that [REDACTED] had a meal on  
6 Jeffrey's island is 100 percent false.

7 Q. But he may have had a meal on  
8 Jeffrey's plane?

9 A. I'm sure he had a meal on Jeffrey's  
10 plane.

11 Q. You do know how many times he flew  
12 on Jeffrey's plane?

13 A. I don't.

14 Q. Do you know who [REDACTED] is?

15 A. I do.

16 Q. How do you know him?

17 A. He used to work or still works for  
18 [REDACTED]

19 Q. Did you ever have a relationship  
20 with him?

21 A. We are talking about adult  
22 consensual relationships, it's off the  
23 record.

24 Q. I'm not asking what you did with  
25 him, I'm asking if you ever had a



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2 relationship with him?

3 MR. PAGLIUCA: If you understand  
4 the term relationship, certainly you can  
5 answer that.

6 A. Define relationship.

7 Q. Somebody that you would have spent  
8 time together, either seeing them in a  
9 romantic relationship or --

10 A. You need to be, what do you mean by  
11 romantic. I was friends with [REDACTED] but you  
12 are suggesting something more so I want to be  
13 clear what you are actually asking me.

14 Q. You defined it. You said you were  
15 friends with him. If that's what you were  
16 that's all I need to know.

17 While you were on the trip with  
18 [REDACTED] do you recall where you  
19 stayed at these locations, in other words,  
20 would you leave the jet and stay overnight at  
21 a hotel, do you have a recollection of this  
22 trip?

23 A. I recollect the trip but if you're  
24 asking me where we stayed, you can see it's a  
25 very fast paced trip. It was very tiring and



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2 form and foundation.

3 A. I don't know why the name is -- I'm  
4 sorry -- I can't -- I have no idea. I  
5 recognize the name but that's it.

6 Q. Was [REDACTED] a masseuse?

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

9 A. What are you asking me, I'm sorry?

10 Q. When [REDACTED] worked for  
11 Jeffrey Epstein, did she perform massages?

12 A. I've testified that when [REDACTED]  
13 came originally, she came to answer  
14 telephones. I believe at some point she  
15 became a masseuse. I don't recollect when  
16 and I personally had massages from [REDACTED]

17 Q. What did [REDACTED] do for Jeffrey  
18 Epstein, did she perform massages, anything  
19 else?

20 MR. PAGLIUCA: Objection to the  
21 form and foundation.

22 A. When she came she answered phones  
23 and at some point, I believe, I don't have  
24 any firm recollection, but I believe she went  
25 to school and became a masseuse and I had

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2 messages from her.

3 Q. Did you ever have any sexual  
4 interaction with her?

5 MR. PAGLIUCA: Object to the form  
6 and foundation and I'm going to instruct  
7 you if we're talking about any  
8 consensual adult contact, you are not  
9 allowed to answer the question.

10 Q. Did you have any sexual contact  
11 with her in the presence of Jeffrey Epstein?

12 MR. PAGLIUCA: Same instruction.

13 Q. Did you have any sexual contact  
14 with her in the presence of anybody other  
15 than Jeffrey Epstein?

16 MR. PAGLIUCA: Same instruction.

17 Q. How many messages did you receive  
18 from [REDACTED]

19 A. I really don't recall but a fair  
20 amount.

21 Q. Did the messages involve sex?

22 MR. PAGLIUCA: I'm going to  
23 instruct you not to answer.

24 Q. Have you ever engaged in sex with  
25 any female?

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2 MR. PAGLIUCA: I'm going to  
3 instruct you not to answer.

4 MS. McCAWLEY: I want the record to  
5 reflect that Ms. Maxwell's attorney is  
6 directing her not to answer this series  
7 of questions.

8 MR. PAGLIUCA: It definitely does.

9 Q. Were you responsible for  
10 introducing [REDACTED] to Jeffrey Epstein?

11 MR. PAGLIUCA: Objection to the  
12 form and foundation.

13 A. I already testified that I don't  
14 really recall [REDACTED]

15 Q. Were you responsible for  
16 introducing [REDACTED] to Jeffrey Epstein?

17 MR. PAGLIUCA: Objection to the  
18 form and foundation.

19 A. Again, I don't like the  
20 characterization of introduction. [REDACTED]  
21 came to answer telephones.

22 Q. When did you -- were you the person  
23 who brought or introduced or met [REDACTED] for  
24 purposes of bringing her to Jeffrey Epstein's  
25 home?