

# EXHIBIT 2

(Filed Under Seal)

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.

- - -

MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026

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2 asked and answered already.

3 Q. You can answer the question.

4 A. I have no idea what [REDACTED]

5 did.

6 Q. You never observed [REDACTED]

7 with girls under the age of 18 at Jeffrey's

8 home?

9 MR. PAGLIUCA: Object to the form

10 and foundation.

11 A. The answer is no, I have no idea.

12 Q. Do you know [REDACTED]

13 A. I do.

14 Q. What is your relationship with

15 [REDACTED]

16 MR. PAGLIUCA: Object to the form.

17 A. What do you mean what is my

18 relationship.

19 Q. Are you friendly with him, how do

20 you know him?

21 A. He is the husband of [REDACTED].

22 Q. Is [REDACTED] one of your friends?

23 A. Yes.

24 Q. Did you ever send Virginia to

25 [REDACTED] to give him a

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2 A. She helps with my not-for-profit  
3 ocean foundation and any other related  
4 activities that I may have.

5 Q. Is she paid for by Jeffrey Epstein?

6 A. No.

7 Q. She is paid for by you?

8 A. Yes.

9 Q. When did you first meet [REDACTED]  
10 [REDACTED]?

11 A. I don't recollect exactly, sometime  
12 maybe 2002, 2003.

13 Q. How did you meet her?

14 A. I don't recollect exactly how we  
15 met.

16 Q. Did Jeffrey introduce you to her?

17 A. I don't recollect how we met.

18 Q. Does she know Jeffrey Epstein?

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

21 A. Can you ask again, please?

22 Q. Does [REDACTED] know Jeffrey  
23 Epstein?

24 A. What do you mean by know?

25 Q. Has she met her him before?

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2 MR. PAGLIUCA: Objection to the  
3 form and foundation.

4 A. I can't recollect a time when  
5 [REDACTED] -- I've seen [REDACTED] with Jeffrey but --

6 Q. You are not sure --

7 A. I know they know either other. I  
8 can't testify to a meeting between them.

9 Q. Do you know where in New Jersey she  
10 lives?

11 A. No

12 Q. You don't know a city?

13 A. No.

14 Q. How long has she worked for you?

15 A. Sometime 2002, 2003.

16 Q. To the present?

17 A. Yeah.

18 Q. Why do you think that [REDACTED]  
19 might know Jeffrey?

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

22 A. Because you know, I know Jeffrey.

23 Q. Have you seen them together?

24 A. I already testified I have not seen  
25 them together, to my recollection.

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2 Q. Is it your testimony that [REDACTED]  
3 [REDACTED] knows Jeffrey Epstein through the work  
4 that she does for you?

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

7 A. I don't recollect, and I don't  
8 recollect how I met [REDACTED] and I can't testify  
9 to what [REDACTED] relationship is or is not with  
10 Jeffrey.

11 Q. Have you ever talked to Jeffrey  
12 about Dana?

13 A. I don't know what you mean.

14 Q. In any way, have you ever had a  
15 conversation with Jeffrey about [REDACTED]?

16 A. In what context.

17 Q. In any context. Have you ever  
18 talked to Jeffrey Epstein about [REDACTED]?

19 A. [REDACTED] works for me so it's entirely  
20 possible that in the course of conversations  
21 since 2002, 2003 that a conversation in which  
22 [REDACTED] name would have come up is entirely  
23 possible.

24 Q. I provided you with and I'm sorry,  
25 I don't know all the numbers, but the

1           G Maxwell - Confidential  
2       statement that was issued by ██████████ that  
3       should be a single page still in your stack  
4       of exhibits there.

5           MR. PAGLIUCA: Exhibit 10.

6           Q. Did you authorize ██████████ to issue  
7       that statement on your behalf in January of  
8       2015?

9           A. I already testified that that was  
10      done by my lawyers.

11          Q. So did you authorize your lawyers  
12      to issue a statement on your behalf through  
13      ██████████ in January of 2015?

14          A. It was determined that I had to  
15      make a statement in the United Kingdom  
16      because of the appalling lies and I just  
17      thought of some new ones.

18                 Virginia's statement that I  
19      celebrated her 16 birthday with her. We can  
20      all agree that that's entirely impossible. I  
21      didn't meet her until she was 17 and other  
22      lies she perpetrated that she had a diary and  
23      we all know is a complete fake. That's not a  
24      diary. It was just a book she was writing  
25      that you helped sell to the press, as if it

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2 (Maxwell Exhibit 17, email, marked  
3 for identification.)

4 Q. This is an email from you on  
5 January 10, 2015 to [REDACTED]  
6 [REDACTED]. The statement you had before you  
7 earlier, that, if you can pull that in front  
8 of you, the one page press release that you  
9 gave. You might know from memory.

10 Was the press release that you  
11 issued with the statement about Virginia  
12 issued in or around January 2, 2015?

13 A. As best as I can recollect.

14 Q. I want to turn your attention to  
15 the document I just handed you which is Bates  
16 No. 001044, from you to [REDACTED]  
17 [REDACTED]. It says in the first sentence, I'm  
18 out of my depth to understand defamation,  
19 other legal hazards and I don't want to end  
20 up in a lawsuit aimed at me from anyone, if I  
21 can help it. Apparently, even saying  
22 Virginia is a liar has hazards.

23 You knew at the time you called  
24 Virginia a liar in early January of 2015 that  
25 that was something that would result in a



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2 with Virginia Roberts.

3 Q. I'm marking this as Maxwell 25.

4 (Maxwell Exhibit 25, email, marked  
5 for identification.)

6 Q. I'm showing you what has been  
7 marked as Maxwell 25.

8 This is an email dated January 11,  
9 2015 at the top?

10 Do you see that that from Jeffrey  
11 to you?

12 A. Uh-huh.

13 Q. And then below there is an email  
14 from [REDACTED] to you and cc'ing [REDACTED]  
15 on January 11, 2015.

16 Do you see that?

17 A. Uh-huh.

18 Q. It says, Dear Ghislaine, as you  
19 know I have been working behind the scenes  
20 and this article comes from that. It helps  
21 but doesn't answer the VR claims. I will get  
22 the criminal allegations out. This shows the  
23 MOS will print truth, not just a VR voice  
24 piece. We can only make the truth by making  
25 a statement.

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2 What did he mean when he said, I  
3 will get the criminal allegations out, what  
4 was he referring to?

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

7 A. I have no idea.

8 Q. Were there criminal allegations  
9 about Virginia that either your lawyer or  
10 [REDACTED] were leaking to the press?

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

13 A. I have no idea.

14 Q. Did you ask him what he meant when  
15 he said, I will get the criminal allegations  
16 out?

17 A. I don't recollect the conversation.

18 Q. Did you direct him to leak to the  
19 press criminal allegations about Virginia  
20 Roberts?

21 A. I already testified that I have no  
22 knowledge of what you are asking me.

23 Q. Were you copied on this email,  
24 correct?

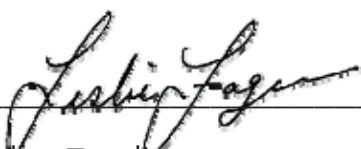
25 A. I was.

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CERTIFICATE

I HEREBY CERTIFY that the witness,  
GHISLAINE MAXWELL, was duly sworn by me and  
that the deposition is a true record of the  
testimony given by the witness.



  
\_\_\_\_\_

Leslie Fagin,  
Registered Professional Reporter  
Dated: April 22, 2016

(The foregoing certification of  
this transcript does not apply to any  
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under the direct control and/or supervision  
of the certifying reporter.)