

**COMPOSITE  
EXHIBIT 5  
(Filed Under Seal)**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x  
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.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x  
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.  
-----x

June 3, 2016  
9:07 a.m.

C O N F I D E N T I A L

Deposition of DAVID RODGERS, 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.

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2 flyer person, then you would reduce it to an  
3 initial?

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

6 MR. REINHART: You can answer the  
7 question.

8 You can answer the question, if you can  
9 answer the question. You are allowed to answer  
10 the question, if you understand the question.

11 BY MR. EDWARDS:

12 Q. I'm trying to understand your testimony.

13 Is it, if you came to know that person --

14 A. Uh-huh.

15 Q. -- as a frequent flyer passenger, you  
16 would begin to reduce that person's name to an  
17 initial at some point?

18 MR. PAGLIUCA: Same objection.

19 THE WITNESS: Well, we don't really have a  
20 frequent flyer program that we do, so to speak.  
21 A lot of times I would do it because if you  
22 would write out everybody's name there is not  
23 enough space, you know, to get everybody's name  
24 in that little square there.

25

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2 Q. -- is that right?

3 And is that -- is Ghislaine Maxwell  
4 somebody that through the years 1995 through 2013  
5 was somebody who flew very frequently?

6 A. What were the years again?

7 Q. The years of this book, 1995 --

8 A. I wouldn't say through 2013. But, yes,  
9 '95 through 2000 sometime. Probably, I would have  
10 to go back and -- well, you can see in there.

11 Q. We will get to it.

12 A. There will be a point where you don't see  
13 her much. But to say it went through 2013 would not  
14 be accurate.

15 Q. Let's do it this way: The person that you  
16 have reflected on numerous notations --

17 A. Yes.

18 Q. -- through here as GM --

19 A. Yes.

20 Q. -- just by the initials, are we able to  
21 safely know that that is Ghislaine Maxwell?

22 A. Yes.

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

25 MR. EDWARDS: Court reporter, did you get

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1 DAVID RODGERS

2 the answer?

3 THE REPORTER: Yes. The answer came  
4 before the objection.

5 BY MR. EDWARDS:

6 Q. So on the next flight, the next day, from  
7 Palm Beach to SAF. Is SAF Santa Fe?

8 A. Yes.

9 Q. And it indicates JE and GM.

10 Are we able to then know that those  
11 passengers on that flight were Jeffrey Epstein and  
12 Ghislaine Maxwell?

13 A. Yes.

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

16 BY MR. EDWARDS:

17 Q. And where would you land at SAF? Is that  
18 an airport?

19 A. It is an airport.

20 Q. Is it a private airport?

21 A. No. It's -- airlines go in there.

22 Q. Did Jeffrey Epstein also have a landing  
23 strip at his property in New Mexico?

24 A. He did at one time.

25 Q. What would that -- do you remember what

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2 that code would be?

3 A. I don't believe there was a code.

4 Q. All right. Were there times that you  
5 landed either the Gulfstream or the Boeing --

6 A. No.

7 Q. No.

8 MR. REINHART: Let him finish the question  
9 before you answer.

10 THE WITNESS: Oh, I'm sorry.

11 BY MR. EDWARDS:

12 Q. Sure. We are doing fine so far. But the  
13 court reporter is taking down all of our questions  
14 and all of our answers. We are communicating well.

15 A. Okay.

16 Q. But when I go to read this back, we may  
17 not get that.

18 A. Okay. Go ahead.

19 Q. So were there times where you landed one  
20 of Jeffrey Epstein's planes on his private landing  
21 strip at the New Mexico property?

22 A. Yes. But not the Gulfstream and not the  
23 Boeing.

24 Q. What plane did you land on his property?

25 A. The Cessna 421. And probably a