

EXHIBIT D

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
2 IN AND FOR BROWARD COUNTY, FLORIDA
3 CASE NO. 15-000072

4 BRADLEY J. EDWARDS and PAUL G.
5 CASSELL,

6 Plaintiffs,

7 -vs-

CONFIDENTIAL

8 ALAN M. DERSHOWITZ,

9 Defendant.

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10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11
12 Saturday, January 16, 2016
13 9:07 a.m. - 2:48 p.m.

14 401 East Las Olas Blvd., Suite 1200
15 Fort Lauderdale, Florida 33301

16
17
18 Reported By:

19 Deborah A. Harris, Court Reporter
20 Notary Public, State of Florida
21 Phone - 305.651.0706

22 Job No. J0277789

23

24

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1 Q. Do you have the originals?

2 A. Again, between the FBI and giving them to
3 my lawyers and Sharon Churcher, the circulation, I'm not
4 too sure if I have the originals. I know I have copies.
5 So I'm not too sure if they're the originals.

6 Q. The booklet that you gave pages from to Ms.
7 Churcher where is that booklet?

8 A. Burned.

9 Q. When did you burn it?

10 A. In, I think it was 2013. Me and my husband
11 had a bonfire.

12 Q. What did you put in the bonfire?

13 A. Any kind of memories that I had written
14 down about all the stuff going on.

15 Q. Had you written anything about Professor
16 Dershowitz?

17 A. He could have been there, yes.

18 Q. And you burned that?

19 A. I wanted to burn my memories. I wanted to
20 get rid of it. It was very painful stuff.

21 Q. Other than what you had written down did
22 you burn anything else? I don't mean the wood, when you
23 talk about burning your memories, what were you burning?

24 A. I was burning like memories, thoughts,
25 dreams that I had, just everything that was kind of

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1 affiliated with the abuse I endured, and there was a lot
2 of it in there. My husband is pretty spiritual so he
3 said the best thing to do would be burn them.

4 Q. Is there anything you decided to keep and
5 not burn?

6 A. Just the photographs.

7 Q. Anything else that you can think of?

8 A. Photographs, that's it.

9 Q. Approximately when in 2013 was this
10 bonfire?

11 A. I don't know what month it was.

12 Q. Did you do it outside?

13 A. Yeah, it was outside. I wasn't going to do
14 it in my living room.

15 Q. Did it feel good to be close to the fire
16 because it was cold out or was it a summertime bonfire?

17 A. I believe I had just bought my house in
18 Titusville, Florida. I bought my house in, I think, I
19 either got it October or November of 2013. It would have
20 been around probably November.

21 Q. Why did you decide to keep the photos?

22 A. They're evidence.

23 Q. Do you have any photographs of yourselves
24 with Professor Dershowitz?

25 A. No.

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1 A. Besides what's in these?

2 Q. Did you ever look to see if you had any
3 personal notes in your writing that pertain to Professor
4 Dershowitz?

5 A. Like from my old journal, the one that I
6 burned?

7 Q. From anywhere. Did you ever make an effort
8 to look?

9 A. Dershowitz could have been in my journal,
10 he could have been. We're talking about an 85 page, if
11 not more, you know, things that I had written to get my
12 story out of my head and into pages; and yes, Dershowitz
13 could have been in there, but that's up in the clouds
14 now, bonfire.

15 Q. That's what you call your journals, what
16 you burned, right?

17 A. Yes.

18 Q. And you wrote that journal in order to
19 collect your thoughts?

20 A. To get everything out of here and on to
21 paper.

22 Q. Have you made any other notes, though,
23 since then to help you when you think of things?

24 A. Yes, sometimes like I said, sometimes when
25 I read my affidavits and stuff like that, you know, and I

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