

# **EXHIBIT B**

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***VIRGINIA GIUFFRE***

*05/03/2016*

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***Agren Blando Court Reporting & Video, Inc.***

*216 16th Street, Suite 600*

*Denver Colorado, 80202*

*303-296-0017*

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1 mic higher up on your jacket, please?

2 THE DEPONENT: Sure.

3 THE VIDEOGRAPHER: Thank you.

4 THE DEPONENT: Tell me if that's okay.

5 Better?

6 A Okay. Page 40?

7 **Q (BY MS. MENNINGER) Right. Do you see the**

8 **first full paragraph on that page?**

9 A I do.

10 **Q The first line begins: I spent my sweet**

11 **16th birthday on his island in the Caribbean next to**

12 **Little (sic) St. James Isle. He liked to call it**

13 **Little St. Jeff's. His ego was enormous as his**

14 **appetite for fornicating.**

15 **Do you see that sentence?**

16 A I do.

17 **Q That is not true, correct? You were not**

18 **spending your sweet 16th birthday on Little St. James**

19 **Isle, correct?**

20 A Based on my knowledge at the time that I

21 wrote this manuscript, I thought I did spend my 16th

22 birthday there. And so I put it down in there as

23 that. Now I know that it wasn't my 16th birthday.

24 **Q Or your sweet 16th birthday?**

25 A Well, we --

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1 MR. EDWARDS: Object to the form.

2 Harassing.

3 **Q (BY MS. MENNINGER) Was it your sweet 16th**

4 **birthday?**

5 A Is it not custom to call your 16th

6 birthday sweet? Have you never heard that saying

7 before?

8 **Q Was it your sweet 16th birthday,**

9 **Ms. Giuffre?**

10 A As we --

11 MR. EDWARDS: She's answered the question.

12 It's been asked and answered.

13 MS. MENNINGER: She asked me a question,

14 actually. You're not testifying here.

15 **Q (BY MS. MENNINGER) Was it your sweet 16th**

16 **birthday?**

17 A As I thought, in the manuscript when I

18 wrote it, I thought it was my sweet 16th birthday.

19 **Q Okay. Now that you know it wasn't, where**

20 **did you spend your sweet 16th birthday?**

21 A Well, I don't know.

22 **Q Well, just give us your best guess.**

23 MR. EDWARDS: Objection. And she's not

24 going to guess today. She's going to tell you the

25 answers as she remembers them.

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1 If you remember the answer, please tell

2 her the answer.

3 A I don't know the answer, where I spent my

4 sweet 16th birthday.

5 **Q (BY MS. MENNINGER) Do you know who you**

6 **were with on your sweet 16th birthday?**

7 A No, I don't.

8 **Q Do you know where you lived on your sweet**

9 **16th birthday?**

10 A No, I don't.

11 **Q Were you living with your parents on your**

12 **sweet 16th birthday?**

13 A I don't know.

14 **Q Were you living with [REDACTED] on your sweet**

15 **16th birthday?**

16 A I don't know. I was a runaway a lot. I

17 don't know where I lived at the time.

18 **Q Okay. Were you working at Taco Bell on**

19 **your sweet 16th birthday?**

20 A I don't think so. I don't know.

21 **Q Were you working at Publix on your sweet**

22 **16th birthday?**

23 A I don't know.

24 **Q Were you working at an aviary on your**

25 **sweet 16th birthday?**

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1 A Again, I don't know.

2 **Q Do you recall any present you actually got**

3 **on your sweet 16th birthday?**

4 A No, I don't. I don't know where I spent

5 it, who I spent it with or what I got. I'm sorry.

6 **Q How long did you work at Mar-a-Lago?**

7 A Best of my recollection, it was a summer

8 job. I believe I started in June. And I think I

9 only worked there approximately two weeks, two, three

10 weeks.

11 **Q How many hours a week did you work?**

12 A I want to say it was a -- I want to say

13 it's a full-time job.

14 **Q Do you recall it being a full-time job?**

15 A It was a summer job, but just thinking

16 back, my dad used to bring me in and bring me home.

17 So he worked full time, all day. So -- and I didn't

18 lounge around Mar-a-Lago so, yes, I think it would

19 have been a full-time job.

20 **Q And how much did you make per hour?**

21 A Approximately, I think I remember making

22 \$9 an hour.

23 **Q The bracelet and earrings you got for your**

24 **birthday, some birthday, on Little -- or where was**

25 **that birthday party, at Little St. James?**

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1 **another prince, the large hotel chain owner and**  
 2 **Marvin Minsky, is there anyone else that Ghislaine**  
 3 **Maxwell directed you to go have sex with?**  
 4 A I am definitely sure there is. But can I  
 5 remember everybody's name? No.  
 6 **Q Okay. Can you remember anything else**  
 7 **about them?**  
 8 A Look, I've given you what I know right  
 9 now. I'm sorry. This is very hard for me and very  
 10 frustrating to have to go over this. I don't -- I  
 11 don't recall all of the people. There was a large  
 12 amount of people that I was sent to.  
 13 **Q Do you have any notes of all these people**  
 14 **that you were sent to?**  
 15 A No, I don't.  
 16 **Q Where are your notes?**  
 17 A I burned them.  
 18 **Q When did you burn them?**  
 19 A In a bonfire when I lived at Titusville  
 20 because I was sick of going through this shit.  
 21 **Q Did you have lawyers who were representing**  
 22 **you at the time you built a bonfire and burned these**  
 23 **notes?**  
 24 A I've been represented for a long time, but  
 25 it was not under the instruction of my lawyers to do

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1 this. My husband and I were pretty spiritual people  
 2 and we believed that these memories were worth  
 3 burning.  
 4 **Q So you burned notes of the men with whom**  
 5 **you had sex while you were represented by counsel in**  
 6 **litigation, correct?**  
 7 MR. EDWARDS: Object to the form.  
 8 A This wasn't anything that was a public  
 9 document. This was my own private journal, and I  
 10 didn't want it anymore. So we burned it.  
 11 **Q (BY MS. MENNINGER) When did you write**  
 12 **that journal?**  
 13 A Just over time. I started writing it  
 14 probably in, I don't know, I can't speculate, 2012,  
 15 2011.  
 16 **Q So you did not write this journal at the**  
 17 **time it happened?**  
 18 A No.  
 19 **Q You started writing this journal**  
 20 **approximately a decade after you claim you finished**  
 21 **being sexually trafficked, correct?**  
 22 A Yes.  
 23 **Q And you started writing a journal after**  
 24 **you had a lawyer, correct?**  
 25 A Correct.

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1 **Q Including Mr. Edwards, who is sitting**  
 2 **right here, correct?**  
 3 A Correct.  
 4 **Q What did that journal look like?**  
 5 A It was green.  
 6 **Q And what else?**  
 7 A It was just a spiral notebook.  
 8 **Q Okay. And what did you put into that**  
 9 **green spiral notebook?**  
 10 A Bad memories. Things that I've gone  
 11 through, lots of things, you know. I can't tell you.  
 12 There was a lot of pages. It was over 300 pages in  
 13 that book.  
 14 **Q Did you ever show that book to your**  
 15 **lawyers?**  
 16 A No.  
 17 **Q Did you show that book to anyone?**  
 18 A My husband.  
 19 **Q Did you show it to anyone else besides**  
 20 **your husband?**  
 21 A No.  
 22 **Q Did you tear out pages and give them to**  
 23 **Sharon Churcher?**  
 24 A No, I wrote -- those pages that you're  
 25 talking about, I wrote for her specifically. She

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1 wanted to know about the Prince Andrew incident.  
 2 **Q So that's a different piece of paper?**  
 3 A Yeah, that's just random paper.  
 4 **Q So you had a green spiral notebook that**  
 5 **you began sometime in 2011 or 2012 in which you wrote**  
 6 **down your recollections about what had happened to**  
 7 **you, and you burned that in a bonfire in 2013.**  
 8 **Did I get that right?**  
 9 A You got that right.  
 10 **Q And do you have no other names of people**  
 11 **to whom you claim Ghislaine Maxwell directed you to**  
 12 **have sex, correct?**  
 13 A At this time, no.  
 14 **Q Is there any document that would refresh**  
 15 **your recollection that you could look at?**  
 16 A If you have a document you'd like to show  
 17 me, I would be glad to look at it and tell you the  
 18 names I recognize off of that.  
 19 **Q I'm just asking you if there's a document**  
 20 **you know of that has this list of names in it?**  
 21 A Not in front of me, no.  
 22 **Q Where is the original of the photograph**  
 23 **that has been widely circulated in the press of you**  
 24 **with Prince Andrew?**  
 25 A I probably still have it. It's not in my

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1 possession right now.

2 **Q Where is it?**

3 A Probably in some storage boxes.

4 **Q Where?**

5 A In Sydney.

6 **Q Where in Sydney?**

7 A At some family's house. We got the boxes

8 shipped to Australia, and they were picked up off the

9 porch by my nephews and brought to their house.

10 **Q Which is where?**

11 A In Sydney.

12 **Q Where in Sydney?**

13 A [REDACTED]

14 **Q And who lives in that house?**

15 A Well, it's owned by my mother-in-law and

16 father-in-law, but my nephews live in the house.

17 **Q What are their names?**

18 A I'm not giving you the names of my

19 nephews.

20 **Q What's the address of the house?**

21 A Why would you want that?

22 **Q I want to know where the photograph is.**

23 **I'm asking you where the photograph is. And you've**

24 **just told me it's somewhere in [REDACTED]**

25 A Yes.

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1 **Q So where in [REDACTED] is the photograph**

2 **located?**

3 A If I can't 100 percent say that the

4 photograph is there, it could be at my house that I

5 presently live in. I'm not going to give you the

6 address of my nephews' residence.

7 **Q When is the last time you saw the**

8 **photograph in person?**

9 A When I packed and left America.

10 **Q Colorado?**

11 A Yes.

12 **Q All right. So you had that photograph**

13 **here with you in Colorado?**

14 A Yes.

15 **Q What's on the back of the photograph?**

16 A I'm sorry?

17 **Q Is there anything on the back of the**

18 **photograph?**

19 A There's like the date it was printed, but

20 no writing or anything.

21 **Q Okay. Does it say where it was printed?**

22 A I don't believe so. I think it just -- I

23 don't remember. I just remember there's a date on

24 it.

25 **Q Whose camera was it taken with?**

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1 A My little yellow Kodak camera.

2 **Q Who took the picture?**

3 A Jeffrey Epstein.

4 **Q And where did you have it developed?**

5 A I believe when I got back to America.

6 **Q So where?**

7 A I don't know.

8 **Q Palm Beach?**

9 A I don't know.

10 **Q What is the date the photograph was**

11 **printed?**

12 A I believe it's in March 2001.

13 **Q Okay.**

14 A But that's just off of my photographic

15 memory. I don't -- it could be different, but I

16 think it's March 2001.

17 **Q You have a photographic memory?**

18 A I'm not saying I have a photographic

19 memory. But if I'd look at the back of the photo and

20 I remember what it says, I believe it was March 2001.

21 **Q Did the photograph ever leave your**

22 **possession for a while?**

23 A I gave it to the FBI.

24 **Q Okay. And when did you get it back?**

25 A When they took copies of it.

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1 **Q When was that?**

2 A 2011.

3 **Q When they came to interview you?**

4 A Yes.

5 **Q So from 2011 until you left Colorado it**

6 **was in your personal possession?**

7 A Yes.

8 **Q What other documents related to this case**

9 **are in that, storage boxes in Australia?**

10 MR. EDWARDS: Object to the form.

11 A Documents related to this case -- there --

12 I don't know. I really can't tell you. I mean,

13 there's seven boxes full of Nerf guns, my kids' toys,

14 photos. I don't know what other documents would be

15 in there.

16 **Q (BY MS. MENNINGER) Did anyone search**

17 **those documents after you received discovery requests**

18 **from us in this case?**

19 A I haven't been able to obtain those boxes.

20 I can't get them sent back up to me. It's going to

21 cost me a large amount of money. And right now I'm

22 trying to look after my family, so I'm not able to

23 afford to get them up.

24 **Q You live in Australia, correct?**

25 A I do.

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1       **Q    Okay. How far away are the boxes from**  
 2 **where you live in Australia?**  
 3       A    Sydney is down here at the bottom. Cairns  
 4 is up here at the top.  
 5       **Q    Okay.**  
 6       A    It's probably a six-day drive.  
 7       **Q    Did you fly here through Sydney?**  
 8       A    No.  
 9       **Q    Have you been to Sydney since you've moved**  
 10 **back to Australia?**  
 11       A    I flew into Sydney with my three kids, but  
 12 it was a connecting flight to Brisbane.  
 13       **Q    Did you ask your nephews or anyone else to**  
 14 **search those boxes in response to discovery requests**  
 15 **that we issued in this case?**  
 16       A    They are my nephews. I would never let  
 17 them look at those.  
 18       **Q    Other than your green spiral notebook,**  
 19 **what else did you burn in this bonfire in 2013?**  
 20       A    That was it.  
 21       **Q    That's the only thing?**  
 22       A    Yes.  
 23       **Q    Did you use wood?**  
 24       A    Yes.  
 25       **Q    Charcoal?**

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1       A    My husband built the bonfire out of wood  
 2 and I don't know what else he put in it. He's the  
 3 one who always makes the fires, not me.  
 4       **Q    Who else was present?**  
 5       A    Just him and I.  
 6       **Q    Were your kids there?**  
 7       A    No. They were inside sleeping.  
 8       **Q    And what beach was this?**  
 9       A    It wasn't a beach. It was in my backyard.  
 10       **Q    What's your address?**  
 11       A    At that time?  
 12       **Q    Um-hum.**  
 13       A    [REDACTED]  
 14       **Q    [REDACTED]**  
 15       A    Yes.  
 16       **Q    Who were your neighbors?**  
 17       A    Sweet people. Ray and -- I could look on  
 18 my phone if you want.  
 19       **Q    No, thank you. Do they still live there?**  
 20       A    Yes.  
 21       **Q    Do you keep in touch with them?**  
 22       A    Last time I talked to them was a few  
 23 months ago.  
 24       **Q    Did they see the fire?**  
 25       A    They've seen many fires that we've had.

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1       We've had lots of bonfires there.  
 2       **Q    Did you ever ride in a helicopter with**  
 3 **Ghislaine Maxwell acting as pilot of the helicopter?**  
 4       A    Yes.  
 5       **Q    Who else was on the flight?**  
 6       A    I've been on the helicopter with her  
 7 plenty of times. I can't mention how many people  
 8 were on the -- on the helicopter at the same time.  
 9       **Q    How many times?**  
 10       A    I don't know. Do you have helicopter  
 11 records that you could show me?  
 12       **Q    I'm asking you how many times you were on**  
 13 **the helicopter with Ghislaine Maxwell acting as the**  
 14 **pilot --**  
 15       A    It's impossible for me to answer the  
 16 question without having the actual physical records  
 17 in front of me.  
 18       **Q    I'm asking you to look into your memory**  
 19 **and tell me how many times you recall being on a**  
 20 **helicopter with Ghislaine Maxwell at the pilot seat?**  
 21       A    There is no number I can give you.  
 22 There's plenty of times I've been on her helicopter.  
 23       **Q    Where did you go from and to on a**  
 24 **helicopter?**  
 25       A    I believe it was -- don't quote me on this

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1       because I get confused on the islands there. I want  
 2 to say it was St. John's. It could have been  
 3 St. Barts. St. John or St. Barts, and then we would  
 4 fly straight to Jeffrey's island.  
 5       **Q    Okay. Did you ever go anywhere else on**  
 6 **the helicopter?**  
 7       A    No.  
 8       **Q    Were you ever on the helicopter with [REDACTED]**  
 9 **[REDACTED] and Ghislaine Maxwell as the pilot of the**  
 10 **helicopter?**  
 11       A    No.  
 12       **Q    Were you ever on the helicopter with [REDACTED]**  
 13 **[REDACTED] and Ghislaine Maxwell as the**  
 14 **pilot?**  
 15       A    No.  
 16       **Q    Do you recall telling Sharon Churcher that**  
 17 **you were?**  
 18       A    No.  
 19       **Q    Did you see the press article in which**  
 20 **Sharon Churcher reported that you were?**  
 21       MR. EDWARDS: Objection. I'd just ask  
 22 that if you're going to ask this witness about a  
 23 specific article I'd like for her to see the article.  
 24 Otherwise she's not going to testify about it.  
 25       If you have something to show her, then,

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1 please.

2 **Q (BY MS. MENNINGER) Do you recall seeing a**

3 **press article in which Sharon Churcher reported that**

4 **you were on a helicopter with [REDACTED] and**

5 **Ghislaine Maxwell as the pilot?**

6 MR. EDWARDS: Again, I'll let you answer

7 the question once she's looking at the document that

8 you're being asked about.

9 MS. MENNINGER: You're not letting her

10 answer a question about whether she recalls a

11 particular press statement?

12 MR. EDWARDS: I will let her answer every

13 question about the press statement as long as she

14 sees the press statement. I'm okay with that. She

15 can answer all of them.

16 MS. MENNINGER: No, there is a rule of

17 civil procedure that allows you to direct a witness

18 not to answer a question when there's a claim of

19 privilege.

20 What privilege are you claiming to direct

21 her not to answer this question?

22 MR. EDWARDS: I thought that you wanted

23 accurate answers from this witness. If the --

24 MS. MENNINGER: I asked her if she

25 recalled something --

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1 MR. EDWARDS: If the sole purpose is to

2 just to harass her --

3 MS. MENNINGER: I asked her if she

4 recalled something --

5 MR. EDWARDS: Then that's just not going

6 to be what's happening today.

7 **Q (BY MS. MENNINGER) All right. So you're**

8 **refusing to answer a question about whether you**

9 **recall a particular press statement --**

10 MR. EDWARDS: She's --

11 **Q (BY MS. MENNINGER) -- is that true?**

12 MR. EDWARDS: She is not refusing to

13 answer any questions. She --

14 A I'm not refusing to answer. I just want

15 to see the article you're talking about so I can be

16 clear in my statement.

17 **Q (BY MS. MENNINGER) Do you recall seeing a**

18 **press article written by Sharon Churcher reporting**

19 **that you flew on a helicopter with [REDACTED] and**

20 **Ghislaine Maxwell as the pilot?**

21 A No, I do not recall reading a press

22 article saying that I was on a helicopter with [REDACTED]

23 [REDACTED] as Ghislaine is the pilot.

24 **Q Do you recall telling Sharon Churcher that**

25 **you had conversations with [REDACTED] regarding him**

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1 **flying on a helicopter with Ghislaine Maxwell?**

2 A I believe that it was taken out of

3 context. Ghislaine told me that she flew [REDACTED]

4 [REDACTED] in. And Ghislaine likes to talk a lot of

5 stuff that sounds fantastical. And whether it's true

6 or not, that is what I do recall telling Sharon

7 Churcher.

8 **Q So you told Sharon Churcher that Ghislaine**

9 **Maxwell is the one who told you that she flew [REDACTED]**

10 **[REDACTED] in the helicopter?**

11 A I told Sharon Churcher that Ghislaine flew

12 [REDACTED] onto the island, based upon what

13 Ghislaine had told me.

14 **Q Not based upon what [REDACTED] had told**

15 **you, correct?**

16 A Correct.

17 **Q Did you ever ask Sharon Churcher to**

18 **correct anything that was printed under her name,**

19 **concerning your stories to Sharon Churcher?**

20 A I wasn't given those stories to read

21 before they were printed.

22 **Q After they were printed did you read them?**

23 A I tried to stay away from them. They were

24 very hard. You have to understand it was a very hard

25 time for me and my husband to have to have this

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1 public -- we didn't think it was going to be this

2 publicly announced and that big. So we turned off

3 the news and we stopped reading so many things.

4 **Q You didn't read the articles about your**

5 **stories to Sharon Churcher --**

6 A I've read some articles --

7 **Q Let me just finish. You did not read the**

8 **articles published by Sharon Churcher about your**

9 **stories to Sharon Churcher?**

10 A I have read some articles about what

11 Sharon Churcher wrote. And a lot of the stuff that

12 she writes she takes things from my own mouth and

13 changes them into her own words as journalists do.

14 And I never came back to her and told her

15 to correct anything. What was done was done. There

16 was nothing else I can do.

17 **Q So even if she printed something that were**

18 **untrue you didn't ask her to correct it, correct?**

19 A There was things that she printed that

20 really pissed me off, but there was nothing I could

21 do about it. It's already out there.

22 **Q She printed things that were untrue,**

23 **correct?**

24 MR. EDWARDS: Objection to the form.

25 Mischaracterization.



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1 A I wouldn't say that they were untrue. I  
2 would just say that she printed them as journalists  
3 take your words and turn them into something else.

4 **Q (BY MS. MENNINGER) She got it wrong?**  
5 MR. EDWARDS: Object to the form.  
6 Mischaracterization.

7 A In some ways, yes.

8 **Q (BY MS. MENNINGER) Did she print things**  
9 **in her articles that you did not say to her?**  
10 MR. EDWARDS: I object and ask that the  
11 witness be given the opportunity to see the document  
12 so that she can review it and answer that question  
13 accurately. Otherwise she's unable to answer the  
14 question. I'm not going to allow her to answer.

15 MS. MENNINGER: You know the civil rules  
16 tell you not to suggest answers to your client.

17 **Q (BY MS. MENNINGER) And you understand**  
18 **your lawyer is now directing you to not all of a**  
19 **sudden remember what your answer is. That's what**  
20 **he's suggesting that you say. So you're not supposed**  
21 **to listen to him suggest that to you. You're**  
22 **supposed to tell me from your memory.**  
23 MR. EDWARDS: That is not what I'm --

24 **Q (BY MS. MENNINGER) Did you --**  
25 MR. EDWARDS: That's not what I'm doing.

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1 You don't get to just talk over me and  
2 tell my client when not to listen to me. All you  
3 have to do to get answers is show her the document  
4 you're talking about, and I'll let her answer every  
5 question. I don't know why we're so scared of the  
6 actual documents.

7 MS. MENNINGER: I don't know why you're  
8 scared of your client's recollection, Mr. Edwards.  
9 But anyway --

10 MR. EDWARDS: Why would you do this to  
11 her?

12 **Q (BY MS. MENNINGER) Did Sharon Churcher**  
13 **print things that you did not say?**  
14 MR. EDWARDS: I'm going to instruct my  
15 client not to answer unless you give her what it is  
16 that you're talking about that was printed. And she  
17 will tell you the answer, the accurate answer to your  
18 question. Just without the document to refresh her  
19 recollection and see it, she's not going to answer  
20 the question.

21 **Q (BY MS. MENNINGER) Did Sharon Churcher**  
22 **print things that you did not say?**  
23 MR. EDWARDS: Same objection. Same  
24 instruction not to answer.  
25 I think I've made a very clear record as

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1 to why I want my client to answer all of these  
2 questions, but I want her to have the fair  
3 opportunity to see this document.

4 **Q (BY MS. MENNINGER) Did Sharon Churcher**  
5 **print things that you felt were inaccurate?**  
6 MR. EDWARDS: Same objection. Same  
7 instruction. If she sees the document, she's going  
8 to answer every one of these questions.

9 **Q (BY MS. MENNINGER) Did any other reporter**  
10 **print statements that you believe are inaccurate?**  
11 MR. EDWARDS: Same objection. Same  
12 instruction.

13 **Q (BY MS. MENNINGER) Did any reporter print**  
14 **statements about Ghislaine Maxwell that were**  
15 **inaccurate?**  
16 MR. EDWARDS: Same objection. Same  
17 instruction.

18 This is harassing. This is harassing a  
19 sexual abuse victim. And all I'm asking is for  
20 fairness, that we just let her see the document so  
21 she can answer this.

22 MS. MENNINGER: Mr. Edwards, please stop  
23 saying anything other than an objection, what the  
24 basis is, or instructing your client not to answer.  
25 MR. EDWARDS: I will do that.

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1 MS. MENNINGER: That's what the Federal  
2 Rules of Civil Procedure provide.

3 MR. EDWARDS: I hear you. They also  
4 provide for fairness and civility. And all I'm  
5 asking, very calmly, is for her to see this.

6 MS. MENNINGER: Mr. Edwards, this is not  
7 your deposition. I'm asking your client what she  
8 remembers. If she doesn't want to talk about what  
9 she remembers, then let her not answer. But you  
10 cannot instruct her not to answer unless there's a  
11 privilege.

12 What privilege --

13 MR. EDWARDS: I am instructing her not to  
14 answer.

15 **Q (BY MS. MENNINGER) All right. You are**  
16 **refusing to answer questions about whether statements**  
17 **to the press about Ghislaine Maxwell attributed to**  
18 **you were inaccurate?**  
19 MR. EDWARDS: She's not refusing not to  
20 answer.

21 A You are refusing to show me these  
22 documents so I could answer properly. I would give  
23 you an answer if you were to show me some documents.

24 **Q (BY MS. MENNINGER) You can't say without**  
25 **looking at a document whether the press attributed to**



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1 **you is accurate or inaccurate?**

2 A Please show me the document.

3 **Q You can't say from the top of your head**

4 **whether any inaccurate statement has been attributed**

5 **to you in the press?**

6 A Please show me a document and I will tell

7 you.

8 **Q Are you refusing to answer my questions**

9 **about your knowledge of whether inaccurate statements**

10 **have been attributed to you in the press?**

11 A Are you refusing to give me the documents

12 to look at?

13 **Q Are you refusing to answer the question?**

14 A I am refusing to answer the question based

15 upon the fact that you are not being fair enough to

16 let me see the document in order to give you an

17 honest answer.

18 **Q Ms. Giuffre --**

19 A Yes.

20 **Q -- we are talking about press that has**

21 **been published on the Internet, correct?**

22 A Yes.

23 **Q Do you have access to the Internet?**

24 A Yes.

25 **Q Have you looked on the Internet and read**

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1 **articles that attribute statements to you about**

2 **Ghislaine Maxwell?**

3 A Yes.

4 **Q Do you know any statement that has been**

5 **attributed to you in a press article on the Internet**

6 **about Ghislaine Maxwell that is untrue?**

7 MR. EDWARDS: Same objection. Same

8 instruction.

9 A Please show me a specific document.

10 **Q (BY MS. MENNINGER) Do you know of any**

11 **such statement about Ghislaine Maxwell attributed to**

12 **you by the press that is inaccurate?**

13 A If you could please show me a specific

14 document.

15 **Q Tell me what Sharon Churcher asked you to**

16 **write for her.**

17 A Any knowledge that I had about my time

18 with [REDACTED]

19 **Q And did you write it?**

20 A Um-hum.

21 **Q What did you write it in or on?**

22 A Paper.

23 **Q What kind of paper?**

24 A Lined paper.

25 **Q Was it in a book or single sheets?**

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1 A Single sheets.

2 **Q And did you write a long document or a**

3 **short document? What was it?**

4 A I can't recall how long the document was,

5 but I would say it would be a few pages.

6 **Q And other than asking you to write**

7 **whatever you remember about [REDACTED] did she**

8 **give you any other directions about what you should**

9 **write?**

10 A She was interested in two things, really.

11 How Epstein got away with so many counts of child

12 trafficking for sex and how [REDACTED] was

13 involved in it. Those were her two main inquiries.

14 **Q What did she ask you to write?**

15 A She asked me to write about [REDACTED].

16 **Q Did she tell you to put it in your own**

17 **handwriting?**

18 A No, she just asked me to write down what I

19 can remember.

20 **Q Did you give her everything that you**

21 **wrote?**

22 A Did I give her the whole entire pages that

23 I wrote?

24 **Q Yes.**

25 A Yeah, I wrote pages for her specifically.

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1 **Q In your own handwriting?**

2 A In my own handwriting.

3 **Q And what you wrote, was that true?**

4 A Yes.

5 **Q And did you get paid for those pieces of**

6 **paper?**

7 A Not for the papers, I don't believe.

8 **Q Okay. Have you gotten paid when they've**

9 **been reprinted?**

10 A No.

11 **Q Have you negotiated any deal with Radar**

12 **Online?**

13 A No.

14 **Q Have you negotiated any deal with Sharon**

15 **Churcher for the purpose of publishing those pieces**

16 **of paper?**

17 A Not those pieces of paper.

18 **Q When did you write those pieces of paper?**

19 MR. EDWARDS: Object to the form.

20 A A week before she came out.

21 **Q (BY MS. MENNINGER) And when did you give**

22 **them to her?**

23 A When she came out.

24 **Q When was that?**

25 A Sometime, I believe, in early 2011.