

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

Q And based on the fact that you learned the fact you had worked at Mar-a-Lago in 2000 -- you became aware in mid-2015 --

A Um-hum.

Q -- that you had met Ms. Maxwell in 2000, correct?

A That's --

MR. EDWARDS: Object to the form.

A That's correct.

Q (BY MS. MENNINGER) All right. And you became aware in mid-2015 that you were not 15 years old when you met Ghislaine Maxwell, correct?

MR. EDWARDS: Object to the form.

A That's correct.

Q (BY MS. MENNINGER) Okay. And who provided you those Mar-a-Lago records in approximately mid-2015?

MR. EDWARDS: I'm going to object.

And to the extent that this invades the attorney-client privilege, if it was your attorneys that you spoke to and learned this information or received this information from, then you're instructed not to answer.

A I cannot answer that question.

Q (BY MS. MENNINGER) Did you yourself look

at records in the middle of 2015 regardless of who showed them to you?

MR. EDWARDS: Objection. And to the extent that they were showed to you or shared by any of your lawyers, you're instructed not to answer the question. It invades the attorney-client privilege.

Q (BY MS. MENNINGER) Did you look at Mar-a-Lago records in the middle of 2015 yourself?

MR. EDWARDS: She's not answering the question.

MS. MENNINGER: On what grounds is she not answering the question?

MR. EDWARDS: I just told you it invades the attorney-client privilege. If she learned --

I will instruct her if she learned by some other way than her attorneys sharing the information with her, then she can answer the question.

Q (BY MS. MENNINGER) I'm asking you not to tell me whether your attorneys showed you the record. I'm asking you not to tell me the source of the record.

I'm asking you if you personally in the middle of 2015 looked at Mar-a-Lago records?

MR. EDWARDS: Same objection.

Same instruction.

Q (BY MS. MENNINGER) I'm going to show you an exhibit filed on, I believe on or about February 6th of 2015. Defendant's Exhibit 4.

(Exhibit 4 marked.)

MR. EDWARDS: Thank you.

Q (BY MS. MENNINGER) And drawing your attention to the heading line that says, Entered on the docket February 6th, 2015.

Do you see that?

A Yes.

Q All right. And Declaration of Jane Doe 3, do you see that on the first page?

A Yes.

Q And it's in the CVRA case, correct, Jane Doe 1 and Jane Doe 2 versus United States of America?

A Yes.

Q All right. And do you recognize this document?

A Yes.

Q And what do you understand this document to be?

A I believe it's more reason to why I should have been added to the CVRA case.

MR. EDWARDS: Objection to the relevance, Counsel.

Q (BY MS. MENNINGER) Okay. And again, if you look to the last page of the document, paragraph 67 --

A The last page?

Q Yes, the very last.

A 67, yes.

Q All right. It says in paragraph 67: I declare under penalty of perjury that the foregoing is true and correct, right?

A Yes.

Q And it was executed on or about the 5th day of February, 2015, correct?

A It's a bit smudged, but it kind of looks like a 5.

Q All right. And then there's a signature block that's redacted that says Jane Doe 3, correct?

A Correct.

Q Do you believe that you signed this document and it was later covered up by that block?

A Yes.

Q All right. And again, is there anything in this document that you believe today to not be true?

MR. EDWARDS: I just ask that you read through the entire document and answer the question.