

EXHIBIT 1

(File 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.

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

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2 30 girls --

3 A. I did not count the number of girls
4 and I did read the police report. I can only
5 testify to what I read.

6 Q. So you are aware that the police
7 report contains reports from 30 underage
8 girls?

9 A. I can't testify to what the girls
10 said. I can only testify to the fact that I
11 read a police report that stated that.

12 Q. Were you working for Jeffrey -- you
13 said you worked for him off and on until 2009,
14 is that correct?

15 A. I helped out from time to time.

16 Q. So you were working with him during
17 the time period when these underage girls
18 were visiting Jeffrey's home?

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

21 A. I was not -- what year, I need
22 years.

23 Q. How about let's say 2005?

24 A. I'm not sure I was at the house at
25 all in 2005, maybe one day, maybe.

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2 Q. How about 2004?

3 A. I was present for his mother's --
4 his mother died in 2004 so I was there for
5 his mother's death and the funeral and I was
6 at the house maybe a handful of days, again.

7 Q. I would like to direct you to, you
8 have it pulled together now, it's page 39,
9 Bates stamped Giuffre 00040?

10 A. Can you repeat that, please.

11 Q. Sure. 00040.

12 A. Yes.

13 Q. At the top of that document, about
14 three lines down, you see the redacted
15 portions where there is black so it blacks
16 out the name.

17 A. I see black redacted portions.

18 Q. That's a black redaction of the
19 name of the minor and there is -- I will
20 represent for the record that's what it is.
21 You can contest that but I'm not asking about
22 the name of the minor.

23 Five lines down, it says, She was
24 just 16 years of age.

25 Do you see that?

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2 A. How would I possibly, these were
3 messages taken when I was not at the house
4 and I have no idea who they are nor how old
5 they are nor anything.

6 Q. How do you know you weren't at the
7 house on this day?

8 A. I was hardly at the house in 2005.

9 Q. So you could have been there, you
10 just don't know?

11 A. In the five days I might have been
12 there in 2005, I suppose it's possible but
13 it's unlikely.

14 MR. PAGLIUCA: Do you know why this
15 isn't redacted if you are representing
16 all the names of people who are underage
17 have been redacted from these records.

18 MS. McCAWLEY: I think it was -- my
19 assumption is it was a miss by the
20 police department.

21 Q. I will direct your attention to SAO
22 3008 so you will skip a page and go back,
23 it's the final page in the message pads and
24 you will see on the top left for Jeffrey, on
25 6/1/2005 from Jean Luc Brunel with a phone