

# **EXHIBIT G**

***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*

Page 205

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

Page 206

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.

Page 207

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

Page 208

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

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.

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?**

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.

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.

Page 213

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?**

Page 214

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.

Page 215

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

Page 216

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 Bill**  
 9 **Clinton and Ghislaine Maxwell as the pilot of the**  
 10 **helicopter?**  
 11 A No.  
 12 **Q Were you ever on the helicopter with Bill**  
 13 **Clinton's Secret Service 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,

Page 277

1 A Oh, like I said, I don't recognize it, but  
 2 it obviously comes from --  
 3 **Q Your e-mail address?**  
 4 A Yes.  
 5 **Q Now, what e-mail address is that, exactly,**  
 6 **on the first page of this exhibit?**  
 7 A @icloud.com, that must be from a phone.  
 8 **Q So that's different from the other e-mail**  
 9 **address?**  
 10 A Yeah, I don't actually know about that  
 11 e-mail address. I obviously used it. It has my  
 12 husband's name on it, Robert Giuffre.  
 13 **Q And is the e-mail signed by your husband?**  
 14 A No, it's signed by me.  
 15 **Q Okay. And in the subject line you wrote**  
 16 **Virginia Roberts (Jane Doe 102), correct?**  
 17 A Subject line?  
 18 **Q The very top line of that page.**  
 19 A Oh, yeah, I see.  
 20 **Q Okay. And it was to**  
 21 **jason.richards2@ic.fbi.gov, correct?**  
 22 A Correct.  
 23 **Q And is that Jason Richards we were just**  
 24 **referring to?**  
 25 A Yes.

Page 278

1 **Q All right. And you had some e-mails with**  
 2 **Jason Richards over time; is that fair?**  
 3 A Sure.  
 4 **Q These ones that came from your computer,**  
 5 **right?**  
 6 A Sure, yes.  
 7 **Q Okay. You talk about having spoken with**  
 8 **Judge Paul Cassell in this first page, correct?**  
 9 A I am here to get this BS non-prosecution  
 10 agreement thrown out and speaking with Judge Paul  
 11 Cassal (sic). He suggested trying to get ahold of  
 12 any photos or video recordings released by the FBI to  
 13 assist our case further in providing (sic) how much  
 14 pedophilia occurred by Jeffrey and the many other  
 15 monsters he obliged with underage girls.  
 16 **Q Okay.**  
 17 A If this is a possibility, please let me  
 18 know so I can give you Brad Edwards (my attorney) his  
 19 contact details. Many thanks for your time and I  
 20 hope we should meet again.  
 21 **Q Okay. And so you were going back to Jason**  
 22 **and trying to get any evidence that the FBI had about**  
 23 **your case, right?**  
 24 A Correct. Any photographs pertaining to  
 25 what -- myself, not of anyone else.

Page 279

1 **Q Right.**  
 2 A But anything they had of me.  
 3 **Q And Brad Edwards, who is sitting right**  
 4 **here, was your attorney at the time and you**  
 5 **identified him as such in the e-mail, correct?**  
 6 A Correct.  
 7 **Q You did not identify Mr. -- Judge Cassell**  
 8 **as your attorney in this e-mail, correct?**  
 9 A I knew him as a former judge, and I just  
 10 wrote down, Judge Paul Cassal (sic) as it looks. But  
 11 he was my attorney -- I don't know if he was my  
 12 attorney at that time. But yes -- he's always --  
 13 he's been with me since the beginning, so --  
 14 **Q So he's representing you in this case now,**  
 15 **correct?**  
 16 A Yes.  
 17 **Q But at that time you don't know if he was**  
 18 **your attorney?**  
 19 A I think he was. I mean, I've been talking  
 20 with him since the beginning. And this is dated  
 21 2014. So I believe at this time he was my attorney  
 22 at the time as well.  
 23 **Q Okay. When do you recall first speaking**  
 24 **with him?**  
 25 A Speaking with Paul, I'm not too sure. I

Page 280

1 can't remember if I spoke to Paul in the phone in  
 2 Australia or if I met him in person in Florida.  
 3 **Q Do you remember when you signed any kind**  
 4 **of fee agreement with him?**  
 5 MR. EDWARDS: Object to the form.  
 6 A Um, the -- well, the first time I would  
 7 have signed an agreement would have been in Florida.  
 8 **Q (BY MS. MENNINGER) When you were living**  
 9 **██████████?**  
 10 A As far as my knowledge reminds me. I  
 11 mean, I'm looking at e-mails that I can't even  
 12 remember sending. It's a possibility I could have  
 13 signed earlier, but as far as I remember.  
 14 **Q Okay. Do you recall ever having e-mail**  
 15 **communications with Sharon Churcher about her**  
 16 **publishing the first serial of your book?**  
 17 A Serial, what does that mean? I'm sorry.  
 18 **Q Like a sequel.**  
 19 A A sequel to my book?  
 20 **Q Um-hum.**  
 21 A My book has never been published.  
 22 **Q Right. Do you remember ever e-mailing**  
 23 **with Sharon about her being the one who would publish**  
 24 **any subsequent follow-up book?**  
 25 A If you have something in front of you to

1 answered. Lacks predicate.  
 2 A I have been suffering from Ghislaine  
 3 Maxwell and Jeffrey Epstein since the summer of 2000.  
 4 So hearing again in 2011 that she's denied it, of  
 5 course, it's going to hurt me.  
 6 Did I hear about this in 2011? I can't  
 7 tell you I honestly have.  
 8 In 2015 is when I know that she denied it.  
 9 And again, I haven't stopped suffering from the  
 10 repercussions that they put me through.  
 11 **Q (BY MS. MENNINGER) And I'm asking you to**  
 12 **separate, if you can, any symptoms that you**  
 13 **experienced anew in March of 2015 -- I mean, excuse**  
 14 **me, March of 2011, as a consequence of this statement**  
 15 **being issued, which I believe you said you don't**  
 16 **recall seeing at the time; is that fair?**  
 17 A But you're asking me now about 2015?  
 18 **Q Nope. March of 2011. Sorry, I misspoke**  
 19 **there.**  
 20 A You're still on 2011?  
 21 **Q Yes. Did you start taking any new**  
 22 **medications in March of 2011?**  
 23 **Let me ask you that.**  
 24 A I've been taking medication to control my  
 25 [REDACTED] since 2002.

1 **Q Okay. So did you take any new medications**  
 2 **or any additional amounts of medications in March of**  
 3 **2011?**  
 4 A I have been taking the same medication  
 5 since 2002.  
 6 **Q Okay.**  
 7 A And that's due to [REDACTED]  
 8 caused from the pain that I suffered at the hands of  
 9 Ghislaine Maxwell and Jeffrey Epstein.  
 10 **Q Did you -- do you recall any neighbors or**  
 11 **other moms at the school or anybody in 2011**  
 12 **referencing to you in any way the fact that Ghislaine**  
 13 **Maxwell had issued a denial of the allegations about**  
 14 **her that had been published in the media in March of**  
 15 **2011?**  
 16 A No. I didn't speak to any -- I didn't  
 17 speak to any moms about what I had gone through. I  
 18 mean, when it came out in the press, I don't think  
 19 any -- like, Australians don't pay attention to news,  
 20 number one.  
 21 Number two, the first time that my friends  
 22 contacted me they were shocked. And this was, I  
 23 believe in -- when the press picked it up again, I  
 24 think, was 2014/2015. And I got a whole bunch of  
 25 like Facebook texts from them saying, Oh, my God, I

1 can't believe you've been through this. I never  
 2 knew. I'm so sorry. You know, that kind of stuff.  
 3 So they never -- I never spoke to anybody about this  
 4 except for my husband.  
 5 **Q All right. So the first time you recall**  
 6 **any sort of people in your community referencing**  
 7 **things to you is when the press picked up on it in**  
 8 **2014 or 2015?**  
 9 A Yeah, I think it may be end of 2014, early  
 10 2015.  
 11 **Q All right. And so in March of 2011 you**  
 12 **don't recall any neighbors or anybody saying anything**  
 13 **to you about this?**  
 14 A No, I don't recall.  
 15 **Q Did anyone tell you in March of 2011 about**  
 16 **Defendant's Exhibit 26, the statement on behalf of**  
 17 **Ghislaine Maxwell?**  
 18 A No, otherwise I would have been able to  
 19 recall it.  
 20 **Q Okay. Do you remember anyone in 2011**  
 21 **ridiculing you because of Defendant's Exhibit 26?**  
 22 A Well, because nobody knew me as Virginia,  
 23 everybody knows me as Jenna, no one probably put two  
 24 and two together. And like I told you, I didn't tell  
 25 anybody. So there was nobody there to ridicule me in

1 2011 over this.  
 2 **Q Where were you living in 2011 when Shaza**  
 3 **came to see you --**  
 4 A Oh, [REDACTED]  
 5 **Q Do you recall applying for any job in or**  
 6 **around 2011 and someone referencing Defendant's**  
 7 **Exhibit 26 and denying you a job?**  
 8 A I don't -- I don't think I applied for a  
 9 job in 2011.  
 10 **Q Okay. Did you go see a doctor and talk to**  
 11 **any doctor about Defendant's Exhibit 26?**  
 12 A Not about this. Not about this paper  
 13 right here. But I have talked to doctors about my  
 14 abuse at the hands of Ghislaine and Jeffrey.  
 15 **Q Have you talked to a doctor about any**  
 16 **statements in the press made by Ghislaine Maxwell?**  
 17 A Recent statements, yes.  
 18 **Q Which doctor did you speak to about that?**  
 19 A Her name is Judith Lightfoot.  
 20 **Q And where is she?**  
 21 A She's in Australia.  
 22 **Q Where in Australia?**  
 23 A She's in Sydney, but we do phone  
 24 conversations.  
 25 **Q Have you ever met her in person?**



1 A Yes.

2 **Q When?**

3 A In 2011.

4 **Q All right. And is she affiliated with an**

5 **office or a hospital or what?**

6 A She's a psychiatrist.

7 **Q All right. Have you seen her in person**

8 **since 2011?**

9 A No, because I've lived so far away and

10 she's kind of the only person that -- like, I've seen

11 a lot of doctors. And I can honestly tell you --

12 it's really hard for them to break down the walls and

13 be comfortable enough to talk to them about this

14 stuff. Judith is different. She's somebody that I

15 feel I can trust. She's 76 and she's just a very

16 lovely lady.

17 And she offers me other ways to deal with

18 my pain and suffering. And I continue to see her

19 over the phone because I can't see her in person.

20 **Q Do you recall ever discussing with her**

21 **Defendant's Exhibit 26?**

22 A I can't recall ever seeing this exhibit.

23 So --

24 **Q Okay.**

25 **(Exhibit 27 marked.)**

1 **Q (BY MS. MENNINGER) I'm going to give you**

2 **Defendant's Exhibit 27.**

3 A Yes.

4 **Q All right. Have you seen this document**

5 **before?**

6 A Yes.

7 **Q And what do you understand it to be?**

8 A Ross@acuityreputation sounds like a PR, if

9 I'm not right -- if I'm not wrong. Sent -- or

10 subject is Ghislaine Maxwell. I don't know [REDACTED],

11 [REDACTED],

12 [REDACTED]

13 It says: To whom it may concern, Please

14 find attached credible statement on behalf of

15 Ms. Maxwell.

16 And then it goes on, to hear about that

17 she is saying: Each time the story is retold it

18 changes with new salacious details about public

19 figures and world leaders and now it is alleged by

20 Ms. Roberts that Alan Dershowitz is involved in

21 having sexual relations with her, which he denies.

22 Ms. Roberts' claims are obvious lies and

23 should be treated as such and not publicized as news,

24 as they are defamatory. Ghislaine Maxwell's original

25 response to the lies and defamatory claims remains

1 the same. Maxwell strongly denies -- excuse me.

2 Excuse me -- strongly denies allegations of an

3 unsavory nature, which have appeared in the British

4 press and elsewhere and reserves her right to seek

5 redress at the repetition of such old defamatory

6 claims.

7 **Q All right. Have you seen this statement**

8 **before?**

9 A I've seen it recently, yes.

10 **Q All right. What -- have you discussed**

11 **this statement with Ms. Lightfoot? I don't know if**

12 **she's a doctor or what.**

13 A Psychiatrist, yeah.

14 **Q Is she an MD?**

15 A I don't know what her levels of credential

16 are. I'm sure she is.

17 **Q Okay. When is the first time that you saw**

18 **the statement?**

19 A This full statement I have only seen

20 through discovery. The original statement that I saw

21 in the press was, Ms. Roberts' claims are obvious

22 lies and so on, so forth. I don't remember seeing

23 this in the press.

24 **Q Okay. So the part that you remember**

25 **seeing in the press is Ms. Roberts' claims are**

1 **obvious lies?**

2 A Yes.

3 **Q Anything else about this?**

4 A I can't remember what else she printed in

5 the press. It's a very horrible thing for her to do,

6 turn around and call me a liar after everything that

7 she knows she's done. And I didn't expect her to

8 come out and be truthful.

9 Jeffrey Epstein hasn't even issued a

10 statement.

11 **Q Sorry. I'm sorry if you misunderstood my**

12 **question.**

13 A Yes.

14 **Q Was there anything else within this**

15 **statement that you recall seeing in the press besides**

16 **the line, Ms. Roberts' claims are obvious lies?**

17 A Without saying 100 percent, I think that

18 the original allegations are not new and have been

19 fully responded to be shown to be untrue. I don't

20 know if that's in the press or not, but I've read

21 this before.

22 So I don't know if I'm confusing this with

23 what I've read out of this or what I've read in the

24 press. The main thing is, I know she called me a

25 liar, and that's what she publicized.



Page 313

1 **Q And when you say she called you a liar,**  
 2 **that's the Ms. Roberts' claims are obvious lies part?**  
 3 A Yes.  
 4 **Q Okay. When is the first time that you saw**  
 5 **this whole document?**  
 6 A I guess when you guys handed it over for  
 7 discovery.  
 8 **Q Okay. And who showed it to you?**  
 9 A It was sent to me by e-mail.  
 10 **Q Okay. Just through the course of**  
 11 **communicating with your attorneys?**  
 12 A Yes.  
 13 **Q You've never seen it published?**  
 14 A Not this whole e-mail, no.  
 15 **Q All right. Did you -- I'm sorry, did you**  
 16 **discuss this publication of what you saw in the press**  
 17 **with Judith Lightfoot?**  
 18 A Yes.  
 19 **Q All right. And when did you discuss it**  
 20 **with her?**  
 21 A When I got back to Australia, Judith and I  
 22 started seeing each other again. Before then, I  
 23 spoke with a doctor in Colorado about this. His name  
 24 is Dr. Olsen. And it was causing me a lot of  
 25 distress to have to deal with being called a liar all

Page 314

1 over again, when I know I'm standing up doing the  
 2 right thing. And the doctor prescribed me  
 3 [REDACTED] And, yeah.  
 4 **Q Okay. So my question was, when did you**  
 5 **discuss it with Judith Lightfoot?**  
 6 **I think I now understand you did that**  
 7 **after you returned to Australia in November or so of**  
 8 **2015; is that right?**  
 9 A I returned to Australia in October, and  
 10 that's when I picked up talking to her again.  
 11 **Q All right. And you're saying that at**  
 12 **another point in time you talked to another doctor,**  
 13 **Dr. Olsen, in Colorado, correct?**  
 14 A Correct.  
 15 **Q And when did you meet with Dr. Olsen?**  
 16 A I don't know the first date that I met  
 17 with him.  
 18 **Q Did you meet with him more than once?**  
 19 A I believe so.  
 20 **Q And you believe you spoke with him about**  
 21 **Ghislaine Maxwell's published statement in the press**  
 22 **that Ms. Roberts' claims are obvious lies.**  
 23 **That's what you believe you spoke with**  
 24 **Dr. Olsen about?**  
 25 A I spoke with Dr. Olsen about being called

Page 315

1 a liar from the people that abused me.  
 2 **Q Okay. Do you recall specifically**  
 3 **mentioning to him Ghislaine Maxwell's statement to**  
 4 **the press?**  
 5 A I mentioned a lot of names to him.  
 6 **Q Okay. What new symptoms did you**  
 7 **experience following January 2nd, 2015?**  
 8 A I think it's one thing to be a victim of  
 9 sexual abuse and survive it and come out trying to  
 10 tell the world my story, and then another thing for  
 11 it to be shut down because these people, Ms. Maxwell  
 12 and others are calling me liars (sic).  
 13 **Q And I asked you what symptoms had you**  
 14 **experienced --**  
 15 MR. EDWARDS: She's going to finish her  
 16 answer to this question. You cut her off so many  
 17 times.  
 18 MS. MENNINGER: It has nothing to do with  
 19 this.  
 20 MR. EDWARDS: It absolutely does. Because  
 21 this is a psychological damages claim, and she is  
 22 trying to explain to you what those damages are.  
 23 **Q (BY MS. MENNINGER) Okay. What are your**  
 24 **symptoms that you experienced since January 2nd, 2015**  
 25 **that are new?**

Page 316

1 A Very strong anxiety attacks, bad panic  
 2 attacks. My throat closes up, I can't breathe. I  
 3 vomit when I have anxiety attacks. My -- this is  
 4 personal, but my sex life has suffered. My marriage  
 5 has suffered. Psychologically, it's just hurt me all  
 6 over again. I mean, they've hurt me before, and now  
 7 they've hurt me again by doing this.  
 8 And I felt like I was in the process of  
 9 healing before this came out because I had opened up  
 10 this wonderful charity called Victims Refuse Silence.  
 11 And then my aim was to heal by helping other girls  
 12 get out of the situations that I was in before.  
 13 And my lawyers were nice enough to help  
 14 me. I have this beautiful website where you can  
 15 click on in any state and you can find a place. I  
 16 have personally called all of them and they will help  
 17 you get out of the situation that you're in. They  
 18 will get you medical help. They will get you legal  
 19 advice. I think I was in the really good process of  
 20 healing. And when this came out, it just ruined me  
 21 all over again.  
 22 **Q (BY MS. MENNINGER) All right. Tell me**  
 23 **all of the damages that you claim occurred to you**  
 24 **because of Defendant's Exhibit 27.**  
 25 A My reputation, my psychological abuse,

Page 325

1 **Q And that hurt your feelings?**  
 2 A Badly.  
 3 **Q Did Buckingham Palace issue a denial of**  
 4 **your allegation?**  
 5 A Yes, that's another one.  
 6 **Q Did Prince Andrew make a public statement**  
 7 **in which he denied your allegations?**  
 8 MR. EDWARDS: Form.  
 9 A I think he did.  
 10 **Q (BY MS. MENNINGER) How do you know which**  
 11 **harm you've suffered is attributable to Ghislaine**  
 12 **Maxwell's denial versus Alan Dershowitz's denial or**  
 13 **Prince Andrew's denial?**  
 14 A Ghislaine Maxwell brought me into the sex  
 15 trafficking industry. She's the one who abused me on  
 16 a regular basis. She's the one that procured me,  
 17 told me what to do, trained me as a sex slave, abused  
 18 me physically, abused me mentally.  
 19 She's the one who I believe, in my heart  
 20 of hearts, deserves to come forward and have justice  
 21 happen to her more than anybody. Being a woman, it's  
 22 disgusting.  
 23 **Q So you cannot delineate what harm you have**  
 24 **suffered in terms of all of the psychological damage**  
 25 **you just disclosed?**

Page 326

1 A Oh, of course.  
 2 **Q -- if that is attributable to Ghislaine**  
 3 **Maxwell's statement on January 2nd versus Alan**  
 4 **Dershowitz calling you a serial liar on Good Morning**  
 5 **America?**  
 6 A Of course, it all hurts. Okay? I know  
 7 Alan Dershowitz is lying himself. I know Prince  
 8 Andrew is lying himself. Of course those hurt. It  
 9 doesn't feel good to have people who have done  
 10 something to you deny something that's happened, when  
 11 I'm actually brave enough to come forward and talk  
 12 about it.  
 13 What hurts me the worst is that Ghislaine  
 14 Maxwell brought me into this. Not only has she hurt  
 15 me once, but she's hurt me twice coming forward and  
 16 saying, This is not true, this is categorically  
 17 untrue and obvious lies.  
 18 That to me is a stick in the mud and that  
 19 to me is what caused the most harm to me.  
 20 **Q Okay. And so can you point to any person**  
 21 **who has referenced Ghislaine Maxwell's denial in the**  
 22 **press or to your face or anywhere?**  
 23 A Can I point to a person?  
 24 **Q Can you point to any time that someone has**  
 25 **referenced Ghislaine Maxwell's denial to you in any**

Page 327

1 **context?**  
 2 MR. EDWARDS: Object to the form of the  
 3 question.  
 4 A Can I point to a person -- I'm sorry. I  
 5 don't understand. Can you rephrase it for me --  
 6 **Q (BY MS. MENNINGER) All right.**  
 7 A -- so I can understand what you mean?  
 8 **Q Where you live in Australia now, has**  
 9 **anyone referenced the name Ghislaine Maxwell to you?**  
 10 A After all of the news hits, after the  
 11 press hits in 2015 and, you know, everyone is calling  
 12 me a liar, all of my friends in Australia called me  
 13 and talked to me and said, I can't believe this. I  
 14 can't believe what you went through.  
 15 That was very embarrassing for something  
 16 that I tried to keep separate from my other life  
 17 where I would like to help victims. I didn't want  
 18 the friends of my kids parents knowing about that  
 19 stuff. You know, and of course they all felt sorry  
 20 for me. And you know, like I said. I didn't know  
 21 anybody in Penrose. So there's nobody that could  
 22 have come up to me and talked to me about it. My  
 23 mom.  
 24 **Q This question was about Australia, sorry.**  
 25 A Oh, sorry, I thought you were talking

Page 328

1 about pointing out people.  
 2 **Q No.**  
 3 A Okay, well in Australia, yes, at least a  
 4 dozen friends.  
 5 **Q They came up and they mentioned Ghislaine**  
 6 **Maxwell's denial to the press to you?**  
 7 A They couldn't believe what I had been  
 8 through and, you know, that these were, you know,  
 9 being denied, and they felt sorry for me. And, you  
 10 know, it was the whole circumference of things.  
 11 **Q So the people in Australia that came up to**  
 12 **you had sympathy for you and believed you, correct?**  
 13 A Yes.  
 14 **Q All right. And when you spoke to**  
 15 **Dr. Olsen you recall specifically mentioning**  
 16 **Ghislaine Maxwell's press release?**  
 17 MR. EDWARDS: Object to the form.  
 18 A Yes, I remember mentioning her, as well as  
 19 the press release, as well as other press releases.  
 20 And the abuse that I had occurred (sic) from the  
 21 hands of Jeffrey and Ghislaine.  
 22 **Q (BY MS. MENNINGER) Okay. When have you**  
 23 **been diagnosed with a mental health condition, first?**  
 24 A I don't know. I mean, I've been told that  
 25 I've [REDACTED] You know --

1 **Q When were you first told that?**  
 2 A Well, early in -- early in 2003, I believe  
 3 is the first time that I was suffering from  
 4 [REDACTED] And then my doctor, Judith  
 5 Lightfoot, has in 2011 [REDACTED]  
 6 [REDACTED]  
 7 And, you know, I've recently seen another  
 8 doctor who said that I've got the exact same symptoms  
 9 that Judith Lightfoot mentioned, which is  
 10 [REDACTED]  
 11 [REDACTED]  
 12 **Q Which doctor is that?**  
 13 A You know, I don't honestly know his name.  
 14 **Q When did you see this new doctor?**  
 15 A Um --  
 16 MR. EDWARDS: Sorry. If you're referring  
 17 to a doctor that's been sent to you by one of your  
 18 lawyers --  
 19 THE DEPONENT: Yes.  
 20 MR. EDWARDS: -- at this time, I'm  
 21 instructing you not to answer.  
 22 THE DEPONENT: Okay.  
 23 MS. MENNINGER: Wait. What is it? You've  
 24 seen a doctor and you're not going to answer what  
 25 doctor you've seen?

1 MR. EDWARDS: Sure. If it's a consulting  
 2 witness in this case that has seen her at the  
 3 direction of an attorney, that has not yet been  
 4 disclosed per any expert witness disclosure, then I'm  
 5 instructing her not to answer that question.  
 6 If that's what you're referring to. I  
 7 don't know if that's what you're referring to.  
 8 THE DEPONENT: That's what I'm referring  
 9 to.  
 10 **Q (BY MS. MENNINGER) All right. So you**  
 11 **recall seeing Dr. Lightfoot. You recall seeing**  
 12 **Dr. Olsen. And you recall seeing a new unnamed**  
 13 **doctor recently.**  
 14 **Anyone else you've seen since January 2nd,**  
 15 **2015?**  
 16 A Dr. Olsen, Dr. Lightfoot. Oh,  
 17 Dr. Donahue.  
 18 **Q Where is Dr. Donahue located?**  
 19 A He's in my suburb or he's a suburb next to  
 20 me in Australia.  
 21 **Q And is that a psychiatric-type doctor, a**  
 22 **medical-type doctor?**  
 23 A He's medical.  
 24 **Q And what did you see him for or her for?**  
 25 A I didn't have anybody to basically -- I

1 just got to Australia and Judith Lightfoot was  
 2 helping me. [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED] And I told him the reason.  
 5 **Q And this is since you returned to**  
 6 **Australia?**  
 7 A Correct.  
 8 **Q And this is the first time you had seen**  
 9 **that doctor?**  
 10 A I've seen that doctor twice now.  
 11 **Q I'm sorry, what was the name again? I**  
 12 **know you already said it, but I just --**  
 13 A Dr. Donahue.  
 14 **Q Donahue, all right.**  
 15 **This doctor that you haven't yet**  
 16 **disclosed, where did you see that person? In what**  
 17 **country?**  
 18 A United States.  
 19 **Q And in what state?**  
 20 A San Francisco.  
 21 **Q And when did you see that doctor?**  
 22 A Um, Friday. Last Friday.  
 23 **Q And how many times have you seen that**  
 24 **doctor?**  
 25 A Once. Well, twice actually. I saw him

1 the next day, too.  
 2 **Q All right. Did you suffer from anxiety**  
 3 **before meeting Jeffrey Epstein?**  
 4 A I was never prescribed anything for  
 5 anxiety before I met Jeffrey Epstein.  
 6 **Q That wasn't my question.**  
 7 A Did I --  
 8 **Q Were you suffering from anxiety before you**  
 9 **met Jeffrey Epstein?**  
 10 A I think a person who has gone through as  
 11 much trauma as I have in my life would suffer from  
 12 quite a few problems. But like I said, I was never  
 13 prescribed anything until I met Jeffrey Epstein.  
 14 **Q Did you suffer from panic attacks before**  
 15 **meeting Jeffrey Epstein?**  
 16 A Nowhere near as bad, no.  
 17 **Q So you did suffer from [REDACTED]**  
 18 **They just weren't as severe; is that what your**  
 19 **testimony is?**  
 20 A No, what I'm trying to say is I did have  
 21 [REDACTED] I did have [REDACTED] I had lived a very  
 22 hard life prior to meeting Jeffrey Epstein as well.  
 23 After meeting Jeffrey Epstein and  
 24 Ghislaine Maxwell, everything escalated. That's when  
 25 I started to take Xanax and smoke marijuana to help

1 calm the anxiety and everything down.

2 **Q Before you met Jeffrey Epstein, had you**

3 **used any drugs?**

4 A Sure, yes.

5 **Q Which drugs had you used prior to meeting**

6 **Jeffrey Epstein?**

7 A I smoked pot. I've taken Ecstasy.

8 **Q Cocaine?**

9 A Yeah, I would have snorted cocaine,

10 um-hum.

11 **Q Did you ever abuse alcohol before meeting**

12 **Jeffrey Epstein?**

13 A No, I was -- I wasn't even of age to be

14 able to buy it. I mean, if there was alcohol at

15 parties I would have drank it, but I wouldn't say I

16 abused it.

17 **Q Okay. Were there ever occasions upon**

18 **which you were observed to be drunk by other people,**

19 **prior to meeting Jeffrey Epstein?**

20 A If you're drinking, the possibility of

21 getting drunk is always there. I don't -- I can't

22 recall exact situation where that was the case,

23 but --

24 **Q Were you diagnosed as a drug addict prior**

25 **to meeting Jeffrey Epstein?**

1 A No, I was not diagnosed as a drug addict.

2 **Q Were you sent to live at a rehabilitation**

3 **facility because of your use of drugs?**

4 A No, that was more of a group home. Yes,

5 it was also a rehab facility, but it wasn't because I

6 was a drug addict. I wasn't coming off of anything.

7 **Q Had you abused drugs prior to meeting**

8 **Jeffrey Epstein?**

9 A I took drugs. I didn't abuse them, but I

10 took them.

11 **Q Okay.**

12 A Recreationally.

13 **Q How often do you see Dr. Lightfoot?**

14 A Once a week every Monday. I've skipped

15 this week because I've been over here and it's

16 expensive to call back home right now, unless you

17 FaceTime, but --

18 **Q Has Dr. Lightfoot recommended that you see**

19 **a treating doctor in person?**

20 A No, she's -- she knows my history pretty

21 well. And she's a very wonderful woman and I

22 honestly wouldn't -- Dr. Donahue wants me to go see

23 another psychiatrist in person, but I prefer to stay

24 with Judith because she's someone I can personally

25 relate to.

1 **Q How much does it cost you every time you**

2 **talk to Dr. Lightfoot?**

3 A Her normal fee is \$200.

4 **Q And how much do you pay?**

5 A She doesn't charge me anything anymore.

6 **Q When did she stop charging you?**

7 A Since I got back to Australia.

8 **Q So before you left for Titusville,**

9 **Florida, you saw her and you were paying \$200 per**

10 **session?**

11 A Yes.

12 **Q And what has Dr. Lightfoot recommended**

13 **that you do in order to get better?**

14 A She loves what I'm doing with speaking

15 out. She thinks the more that I speak out about it,

16 the stronger I'll become. She recommends that I

17 write my book, I tell my story. She thinks not only

18 will it help me, but by helping me it'll help others

19 find a way to get out of the situation and to know

20 that there's other girls who have gone through what

21 I've gone through and what they're going through.

22 She recommends meditation, breathing

23 techniques, focus techniques.

24 **Q Does she prescribe medications for you?**

25 A No, she doesn't. She's a spiritual

1 doctor.

2 **Q Is there anything that she's recommended**

3 **that you do that you're not doing?**

4 A Is there anything that I do that she

5 recommends I don't? Sorry, say that one more time.

6 **Q That's okay. Is there anything that**

7 **Dr. Lightfoot has recommended that you do that you**

8 **are not actually doing?**

9 **Are you following her advice?**

10 A Yes, I am.

11 **Q Okay. And what has Dr. Donahue**

12 **recommended that you do?**

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]