## **EXHIBIT A**

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	x
VIRGINIA L. GIUFFRE,	
Plaintiff, -against-	Case No.: 15-cv-07433-RWS
GHISLAINE MAXWELL,	
Defendant.	
	x AL**

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 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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1			
2	APPEARANCES:		
3	FARMER JAFFE WEISSING EDWARDS FISTOS & LEHRMAN, P.L.	3	
4	Attorneys for Plaintiff	4	
5	425 N. Andrews Avenue Fort Lauderdale, Florida 33301	5	
	BY: BRAD EDWARDS, ESQUIRE	6	,
6 7		7	
'	HADDON MORGAN FOREMAN	8	3
8	Attorneys for Defendant 150 East 10th Avenue	9	
9	Denver, Colorado 80203	10	
10	BY: JEFFREY S. PAGLIUCA, ESQUIRE	11	
11		12	
1.0	FREEMAN LEWIS LLP	13	
12	Attorneys for the Witness 228 East 48th Street	14	
13	New York, New York 10017	15	
14	BY: ROBERT LEWIS, ESQ.	16	
15	Also Proceeds	17	
16	Also Present:	18	
	RODOLFO DURAN, Videographer	19	Q. What is your educational
17 18		20	
19		21	
20 21		22	minor in business law from Texas A&M
22		23	University, and I have a degree in applied
23 24		24	science in hospitality and culinary arts from
25		25	the Culinary Institute of America.
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1		1	R. Rizzo - Confidential
2	THE VIDEOGRAPHER: This is DVD No.	2	
3	1 in the video-recorded deposition of	3	
4	Rinaldo Rizzo, in the matter of Virginia	4	Q. Who are you married to?
5	Giuffre versus Ghislaine Maxwell, in the	5	
6	United States District Court, Southern	6	Q. How long have you been married?
7	District of New York. This deposition	7	
8	is being held at 333 Main Street in	8	22.
9	Armonk, New York, June 10, 2016, at	9	Q. And do you have children?
10	approximately 10:06 a.m.	10	A. Yes.
11	My name is Rodolfo Duran. I am the	11	
12	legal video specialist. The court	12	
13	reporter is Leslie Fagin, and we're both	13	$\mathcal{E}$
14	in association with Magna Legal	14	J 1
15	Services.	15	1
16	Will counsel please introduce	16	
17	themselves.	17	
18	MR. EDWARDS: Brad Edwards. I	18	, , , , , , , , , , , , , , , , , , ,
19	represent the plaintiff, Virginia	19	· · · · · · · · · · · · · · · · · · ·
20	Giuffre.	20	$\boldsymbol{\mathcal{E}}$
21	MR. PAGLIUCA: Jeff Pagliuca,	21	1.1
22	appearing on behalf of Ms. Maxwell.	22	,
23	MR. LEWIS: Robert Lewis, with the	23	
24	firm of Freeman Lewis, LLP,	24	
25	representing the deponent, Rinaldo	25	A. Yes.



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1	R. Rizzo - Confidential	1	R. Rizzo - Confidential
2	fired abruptly at this point, right?	2	Q. The lawsuit with the Dubins
3	A. Correct.	3	referenced in Exhibit 3 was settled, I take
4	Q. You went and retained counsel to	4	it?
5	sue the Dubins, their entity and	5	A. Correct.
6	all of them, right?	6	Q. That was pursuant to a confidential
7	A. Correct.	7	settlement agreement?
8	Q. I take it you were deposed in	8	A. Correct.
9		9	Q. And I am assuming that you received
10	connection with that litigation, correct?  A. Correct.	10	` .
		11	a sum of money to settle that litigation, is that correct?
11	Q. Now, during that litigation, that		
12	litigation meaning the reference in Exhibit	12	A. Correct.
13	3, 13-cv-8864, did you ever tell anyone about	13	Q. And I'm not going to ask you the
14	the interactions with Mr. Epstein that you	14	details about that, but in case I need to do
15	described here today?	15	something, let me put it this way. If I
16	A. No, I did not.	16	choose to subpoena that settlement agreement
17	Q. That was not a part of your	17	from the Dubins, are you going to have any
18	lawsuit, correct?	18	objection to that, or is it all right if we
19	A. Could you restate the question? I	19	do that as far as you are concerned?
20	don't understand what	20	A. I would have to discuss it with my
21	Q. You didn't raise that as an issue	21	lawyer.
22	as to why you were suing the Dubins in 2013,	22	MR. PAGLIUCA: I can talk to you
23	right?	23	about that, if we decide to do it.
24	A. No, I did not.	24	Q. I just want to turn now, and this
25	THE VIDEOGRAPHER: The time is	25	is the last series of questions I have, what
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1	R. Rizzo - Confidential	1	R. Rizzo - Confidential
2	12:41. We are going off the record.	2	you did in advance of coming here today.
3	(Recess.)	3	Have you talked to Mr. Edwards
4	THE VIDEOGRAPHER: The time is	4	before?
5	12:47 p.m. We are back on the record.	5	A. Yes.
6	This begins DVD No. 3.	6	Q. And when have you talked to Mr.
7	BY MR. PAGLIUCA:	7	Edwards?
8	Q. I just have a few more questions.	8	A. I don't recall the exact date and
9	I'm going to finish off with your employment.	9	time.
10	So after this lawsuit was	10	Q. Did Mr. Edwards call you or did you
11	concluded, referenced in Exhibit 3, have you	11	call Mr. Edwards first?
12	worked since then?	12	A. I called him.
13	A. No, I have not.	13	Q. When did you call Mr. Edwards?
14	Q. Has your wife worked since then?	14	A. I don't recall the exact date and
15	A. On and off, yes.	15	time.
16	Q. How is it that you are currently	16	Q. Years ago, days ago, months ago?
17	supporting yourself?	17	A. It's been at least over a year.
18	A. I'm on disability.	18	Q. Why did you call Mr. Edwards?
19	Q. That's as a result of your back	19	A. At the time I was having a very
20	injury?	20	hard time with my attorney. My wife and I
21	A. Yes, and my hip injury.	21	had discussed the issue. As my wife put it,
22	Q. I didn't realize you had a hip	22	we needed an attorney with balls and she had
23	injury, I'm sorry. Is that Social Security	23	been keeping track of the Jeffrey Epstein
24	disability?	24	issue, and basically in our conversation
25	A. Yes, it is.	25	MR. LEWIS: Let me stop you there.

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1	R. Rizzo - Confidential	1	R. Rizzo - Confidential
2	There is a privilege of spousal	2	on attorney/client privilege grounds.
3	privilege, so please don't disclose	3	The conversation is privileged for the
4	conversations you had with your wife.	4	purpose of seeking legal advice.
5	THE WITNESS: Sorry.	5	MR. PAGLIUCA: I don't understand.
6	MR. LEWIS: You can answer the	6	Mr. Edwards is the lawyer for the
7	question why you called, but you don't	7	witness.
8	need to disclose anything about	8	MR. LEWIS: I am the lawyer for the
9	conversations with your wife.	9	witness.
10	A. I was looking for an attorney that	10	MR. PAGLIUCA: I know, I'm not
11	basically could handle this kind of	11	asking about you.
12	situation, and I felt like, from what I had	12	MR. LEWIS: He called Mr. Edwards
13	read, that Mr. Edwards was probably someone I	13	for the purpose to determine whether Mr.
14	needed to attain, if I could.	14	Edwards could represent him in some
15	Q. And so the, you referenced	15	capacity in that other lawsuit, so the
16	dissatisfaction with an attorney. I'm	16	conversations is privileged.
17	assuming that was the attorney that filed	17	MR. PAGLIUCA: I'm going to
18	this 13-cv-8664 action, is that correct?	18	disagree, and you know we may need to
19	A. Correct.	19	revisit that issue respectfully.
20	Q. So you weren't happy with that	20	MR. LEWIS: Fair enough.
21	lawyer and you were looking for a more	21	MR. PAGLIUCA: Let me put some
22	aggressive lawyer?	22	parameters on this that don't ask for
23	A. Correct, or someone that could work	23	communications.
24	with my lawyer.	24	MR. LEWIS: Ask a question and I
25	Q. The point being you were looking to	25	will object or not.
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1	R. Rizzo - Confidential	1	R. Rizzo - Confidential
2	recover some form of compensation, I take it,	2	Q. I think you said you called Mr.
3	from the Dubins or Mr. Epstein?	3	Edwards about a year ago?
4	A. I was hoping how does Mr.	4	A. More or less, correct.
5	Epstein	5	Q. I didn't print out the docket
6	Q. I don't know. I'm asking the	6	sheet, but do you recall when you settled the
7	question.	7	13-cv-8664 case?
8	A. That's incorrect.	8	A. To the best of my recollection, I
9	Q. You were seeking to get	9	think it was in December.
10	compensation from the Dubins, though?	10	Q. Of?
11	A. Correct.	11	A. I don't recall. I mean, it's last
12	Q. And that was the point of you	12	year.
13	calling Mr. Edwards is that, however you	13	Q. Without telling me what you told
14	learned it, you learned about the Epstein	14	Mr. Edwards, what was the purpose of your
15	litigation and you knew Mr. Edwards was	15	calling I think you already told me this,
16	involved in the Epstein litigation?	16	so I won't reask it. Never mind.
17	A. Correct.	17	Did you just speak with Mr. Edwards
18	Q. The point of you contacting Mr.	18	over the phone?
19	Edwards was to see if he could represent you	19	A. Correct, yes.
20	in some litigation involving the Dubins in	20	Q. And I take it Mr. Edwards did not
21	which you would collect money, is that right?	21	become your lawyer in connection with any
22	A. Correct.	22	litigation against the Dubins, correct?
23	Q. And so when you called Mr. Edwards,	23	MR. LEWIS: You may answer that.
24	what do you recall telling him?	24	A. Correct.
25	MR. LEWIS: At this point, I object	25	Q. And Mr. Edwards in some fashion

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1	R. Rizzo - Confidential	1	R. Rizzo - Confidential	
2	indicated to you that he wasn't going to be	2	but I want to make sure.	
3	your lawyer in connection with litigation,	3	After that first conversation with	
4	correct?	4	Mr. Edwards, did you speak with Mr. Edwards	
5	MR. LEWIS: Objection. Do not	5	again in advance of this deposition today?	
6	answer that on privilege grounds.	6	MR. LEWIS: You may answer that.	
7	Q. Mr. Edwards never became your	7	A. No, I have not.	
8	lawyer, is that right?	8	Q. Do you know, did Mr. Edwards	
9	A. Correct.	9	provide a list of questions to your lawyer,	
10	Q. After that conversation, did you	10	who is here today, for you to provide those	
11	have any after you understood that Mr.	11	answers to your lawyer to give to Mr.	
12	Edwards was not your lawyer, did you have	12	Edwards?	
13	further conversations with Mr. Edwards?	13	MR. LEWIS: I advise the witness to	
14	A. No, I did not.	14	only answer that question to the extent	
15	Q. You may object to this, but I need	15	he knows it outside of any conversations	
16	to ask this question. In the first	16	that he might have had with me, which	
17	conversation that you had with Mr. Edwards,	17	are privileged.	
18	did you tell Mr. Edwards the things that	18	A. No.	
19	you've told us here today?	19	Q. So let me explain that question,	
20	MR. LEWIS: Objection. Do not	20	and here is my issue with that, and I don't	
21	answer.	21	know if this happened or didn't happen, but	
22	MR. PAGLIUCA: Privilege?	22	if there are questions that are given	
23	MR. LEWIS: Yes.	23	proposed to you by Mr. Edwards and you give	
24	MR. PAGLIUCA: So just so the	24	them to the client with the expectation he is	
25	record is clear, it seems to me this	25	going to give that information to you to give	
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1	R. Rizzo - Confidential	1	R. Rizzo - Confidential	
2	would be a subject matter waiver of	2	to Mr. Edwards, it's not privileged.	
3	everything that he has talked about. I	3	MR. LEWIS: I can represent that	
4	don't know why it makes a difference if	4	didn't happen.	
5	he is talking about it now and he told	5	MR. PAGLIUCA: That solves the	
6	Mr. Edwards, I think he can talk about	6	problem.	
7	what he said to Mr. Edwards. It seems	7	Q. I'm just closing the loop on this	
8	to me there is a waiver here.	8	and then we are done.	
9	MR. LEWIS: You are presuming what	9	Have you spoken to anyone who is	
10	he said to Mr. Edwards. And secondly,	10	affiliated with Mr. Edwards, either another	
11	just because, even if that were the	11	lawyer in his office, paralegal, an	
12	case, I'm not saying it is, just because	12	investigator, about the things that you've	
13	you testify to incidents which you tell	13	talked about here today?	
14	your attorney about doesn't mean the	14	A. No, I have not.	
15	disclosures to your attorney are not	15	MR. PAGLIUCA: That's all I have.	
16	privileged.	16	MR. EDWARDS: I don't have any	
17	MR. PAGLIUCA: Fair enough. We can	17	questions. I appreciate you taking the	
18	argue about this later if we need to.	18	time. Sorry about your injury.	
19	BY MR. PAGLIUCA:	19	THE VIDEOGRAPHER: The time is	
20	Q. Other than Mr. Edwards and your	20	12:58 p.m. and we are going off the	
21	wife and your current attorney, have you	21	record.	
22	talked to anyone else about the things that	22	(Recess.)	
23	you've talked about here today?	23	THE VIDEOGRAPHER: Back on the	
24	A. No, I have not.	24	record.	
25	Q. I think you answered this question,	25	MR. PAGLIUCA: The parties have	