# EXHIBIT 6

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Plaintiff,

Case No.: 15-cv-07433-RWS Page 1

-against-

GHISLAINE MAXWELL,

Defendants.

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#### \*\*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.

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

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               JEFFREY S. PAGLIUCA, ESQUIRE
     BY:
               LAURA A. MENNINGER, ESQUIRE
19
20
    Also Present:
21
         James Christe, videographer
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Page 52 G Maxwell - Confidential 1 for sexual acts. 2 I'm asking if they performed sexual 3 Q. acts? 4 MR. PAGLIUCA: Object to the form 5 and foundation. 6 Did any of the massage therapists 7 0. who were at the home perform sexual acts for 8 Jeffrey Epstein? 9 I don't know what you mean by 10 Α. sexual acts. 11 Did any of the massage therapists 12 Q. who were working at the home perform sexual 13 acts, including touching the breasts, 14 touching the vaginal area, being touched 15 while Jeffrey is masturbating, having 16 intercourse, any of those things? 17 MR. PAGLIUCA: Objection. Form and 18 foundation. 19 To the extent any of this is asking 20 for to your knowledge any consensual sex 21 act that may or may not have involved 22 you, I'm instructing you not to answer 23 the question. 24 I'm not asking about consensual sex 25 Q.



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Page 53 G Maxwell - Confidential 1 I'm asking whether any of the massage acts. 2 therapists performed sexual acts for Mr. 3 Epstein, as I have just described? 4 I have never seen anybody have 5 Α. sexual intercourse with with Jeffrey, ever. 6 7 0. I'm not asking about sexual intercourse. I'm asking about any sexual 8 act, touching of the breast -- did you ever 9 see -- can you read back the question? 10 (Record read.) 11 I'm not addressing any questions Α. 12 about consensual adult sex. If you want to 13 talk about what the subject matter, which is 14 defamation and lying, Virginia Roberts, that 15 you and Virginia Roberts are participating in 16 perpetrating her lies, I'm happy to address 17 those. I never saw any inappropriate 18 underage activities with Jeffrey ever. 19 I'm not asking about underage. I'm 20 0. asking about whether any of the masseuses 21 that were at the home perform sexual acts for 22 Jeffrey Epstein? 23 I have just answered the question. 24 Α. No, you haven't. 25 Q.



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Page 54 G Maxwell - Confidential 1 I have. A. 2 No, you haven't. 3 0. A. Yes, I have. 4 You are refusing to answer the 5 0. question. 6 7 Α. Let's move on. O. I'm in charge of the deposition. I 8 say when we move on and when we don't. 9 You are here to respond to my 10 questions. If you are refusing to answer the 11 court will bring you back for another 12 deposition to answer these questions. 13 Do you understand that? 14 MR. PAGLIUCA: You don't need to 15 threaten the witness. 16 MS. McCAWLEY: I'm not threatening 17 her. I'm making sure the record is 18 clear. 19 MR. PAGLIUCA: Certainly can you 20 apply to have someone come back and the 21 court may or may not have her come back 22 23 again. Again, she is not answering 24 questions that relate to adult consent 25



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          sex acts. Period. And that's the
 2
          instruction and we can take it up with
 3
          the court.
 4
              Ms. Maxwell, are you aware of any
 5
          0.
     sexual acts with masseuses and Jeffrey
 6
     Epstein that were nonconsensual?
 7
          Α.
               NO.
 8
              How do you know that?
 9
          0.
               All the time that I have been in
          A.
10
     the house I have never seen, heard, nor
11
     witnessed, nor have reported to me that any
12
     activities took place, that people were in
13
     distress, either reported to me by the staff
14
     or anyone else. I base my answer based on
15
     that.
16
               Are you familiar with a person by
17
          0.
     the name of Annie Farmer?
18
          Α.
               I am.
19
               Has Annie Farmer given a statement
20
          0.
     to police about you performing sexual acts on
21
22
    her?
               I have not heard that.
23
          Α.
              Has Annie Farmer given a statement
24
          Q.
     to police about Jeffrey Epstein performing
25
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Page 64 G Maxwell - Confidential 1 Did you have sex with her? 2 0. MR. PAGLIUCA: This is the same 3 instruction about consensual or 4 nonconsensual. 5 Q. Was Emmy under the age of 18 when 6 you hired her? 7 No. I didn't hire her, as I said, Α. 8 Jeffrey did. 9 Q. Did Emmy ever have sex with 10 Jeffrey? 11 MR. PAGLIUCA: Objection to the 12 form and foundation. 13 A. How would I know what somebody else 14 did. 15 You weren't involved in the sex 0. 16 between Jeffrey, Emmy and yourself? 17 We already --Α. 18 Were you involved with sex between 0. 19 Jeffrey, Emmy and yourself? 20 MR. PAGLIUCA: Everyone is talking 21 over each other. You heard the 22 23 question. Again, you you know what the 24 instruction is. If there is any 25



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Page 65 G Maxwell - Confidential 1 consensual issue involved, I instruct 2 3 you not to answer. Α. Moving on. 4 So you are refusing to answer that 5 Q. question? 6 I've been instructed by my lawyer. Α. 7 Q. Did you ever have sex with Jeffrey, 8 Emmy, Virginia and yourself when Virginia was 9 10 underage? Α. Absolutely not. 11 MR. PAGLIUCA: We've been going for 12 about an hour. I would like to take a 13 five-minute break, please. 14 MS. McCAWLEY: I'm almost done. 15 MR. PAGLIUCA: You are not going to 16 allow a break. 17 MS. McCAWLEY: As soon as I get 18 through my line of questioning, which is 19 perfectly appropriate. 20 Did Emmy Taylor travel with you and 21 0. Jeffrey to Europe? 22 I'm sure she did. A. 23 Q. What is she doing today? 24 A. I have no idea. 25



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Page 82 1 G Maxwell - Confidential Did you train Virginia on how to 2 Q. recruit other girls to perform sexual 3 4 massages? 5 MR. PAGLIUCA: Objection to the form and foundation. 6 No. And it's absurd and her entire 7 Α. story is one giant tissue of lies and 8 furthermore, she herself has -- if she says 9 that, you have to ask her about what she did. 10 Does Jeffrey like to have his 11 0. nipples pinched during sexual encounters? 12 MR. PAGLIUCA: Objection to form 13 and foundation. 14 I'm not referring to any advice on 15 Α. my counsel. I'm not talking about any adult 16 sexual things when I was with him. 17 18 When Jeffrey would have a massage, Q. 19 would he request that the masseuse pinch his nipples while he was having a massage? 20 I'm not talking about anything with 21 Α. 22 consensual adult situation. 23 What about with underage --Q. I am not aware of anything. Α. 24 25 Q. You are not aware of Jeffrey



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Page 92 G Maxwell - Confidential 1 In your responsibilities in working 0. 2 for Jeffrey, would you book massages for him 3 on any given day so that he would have a 4 massage scheduled? Would you take a call for 5 example and book a massage for him? 6 MR. PAGLIUCA: Objection to the 7 form and foundation. 8 You can answer. Ο. 9 Typically, that was not my 10 A. responsibility. He would either book the 11 massage himself or one of his other 12 assistants would do that. 13 From time to time you had to do 14 Q. that? 15 MR. PAGLIUCA: Objection to the 16 form and foundation. 17 Like I said, typically it was Α. 18 somebody else's responsibility. 19 If you were unable to book a girl 20 0. for a massage on a given day, would that mean 21 that you were responsible for giving him a 22 23 sexual massage? MR. PAGLIUCA: Objection to the 24 form and foundation and I instruct you 25



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Page 93 1 G Maxwell - Confidential not to answer any questions about any of 2 3 your consensual adult sexual activity. Q. So you are not going to answer that 4 question? 5 You just heard my counsel. Α. 6 Have you ever said to anybody that 7 Ο. 8 recruiting other girls to perform sexual massages for Jeffrey Epstein takes the 9 pressure off you? 10 11 MR. PAGLIUCA: Object to the form and foundation. 12 Repeat the question and break it 13 Α. 14 out. Have you ever said to anybody that 15 Q. you recruit girls --16 Stop right there. 17 A. I never recruited girls, let's stop there. Now 18 19 breakdown the question. Have you ever said to anybody --20 Ο. By girls, we are talking about 21 Α. underage people -- you said girls, are you 22 talking about underage -- we are not talking 23 about consensual acts -- this is a defamation 24 suit. 25



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Page 137 G Maxwell - Confidential 1 2 the flights? I can't recollect having a meal Α. 3 with them, but just so we are clear, the 4 allegations that Clinton had a meal on 5 6 Jeffrey's island is 100 percent false. But he may have had a meal on 7 Ο. Jeffrey's plane? 8 I'm sure he had a meal on Jeffrey's 9 A. plane. 10 You do know how many times he flew 0. 11 on Jeffrey's plane? 12 I don't. 13 Α. Do you know who Doug Band is? Q. 14 I do. A. 15 Q. How do you know him? 16 He used to work or still works for 17 Α. Bill Clinton. 18 Did you ever have a relationship 19 0. with him? 20 We are talking about adult 21 Α. consensual relationships, it's off the 22 record. 23 Q. I'm not asking what you did with 24 him, I'm asking if you ever had a 25



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Page 138 G Maxwell - Confidential 1 relationship with him? 2 MR. PAGLIUCA: If you understand 3 the term relationship, certainly you can 4 5 answer that. Α. Define relationship. 6 7 Ο. Somebody that you would have spent 8 time together, either seeing them in a romantic relationship or --9 You need to be, what do you mean by 10 Α. romantic. I was friends with Doug but you 11 are suggesting something more so I want to be 12 clear what you are actually asking me. 13 You defined it. You said you were 14 0. friends with him. If that's what you were 15 that's all I need to know. 16 While you were on the trip with 17 18 President Clinton, do you recall where you 19 stayed at these locations, in other words, would you leave the jet and stay overnight at 20 a hotel, do you have a recollection of this 21 22 trip? I recollect the trip but if you're 23 Α. asking me where we stayed, you can see it's a 24 25 very fast paced trip. It was very tiring and



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Page 307 G Maxwell - Confidential 1 form and foundation. 2 Α. I don't know why the name is -- I'm 3 sorry -- I can't -- I have no idea. 4 I 5 recognize the name but that's it. 6 0. Was Johanna Sjoberg a masseuse? 7 MR. PAGLIUCA: Objection to the form and foundation. 8 What are you asking me, I'm sorry? 9 Α. 10 Q. When Johanna Sjoberg worked for Jeffrey Epstein, did she perform massages? 11 I've testified that when Johanna 12 Α. 13 came originally, she came to answer 14 telephones. I believe at some point she became a masseuse. I don't recollect when 15 and I personally had massages from Johanna. 16 What did Johanna do for Jeffrey 17 Q. Epstein, did she perform massages, anything 18 else? 19 MR. PAGLIUCA: Objection to the 20 21 form and foundation. When she came she answered phones 22 Α. 23 and at some point, I believe, I don't have any firm recollection, but I believe she went 24 to school and became a masseuse and I had 25



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Page 308 G Maxwell - Confidential 1 massages from her. 2 Did you ever have any sexual 3 0. interaction with her? 4 MR. PAGLIUCA: Object to the form 5 and foundation and I'm going to instruct 6 you if we're talking about any 7 consensual adult contact, you are not 8 allowed to answer the question. 9 Did you have any sexual contact 10 0. with her in the presence of Jeffrey Epstein? 11 MR. PAGLIUCA: Same instruction. 12 Did you have any sexual contact Q. 13 with her in the presence of anybody other 14 than Jeffrey Epstein? 15 MR. PAGLIUCA: Same instruction. 16 Q. How many massages did you receive 17 from Johanna? 18 I really don't recall but a fair 19 Α. amount. 20 Did the massages involve sex? 21 0. MR. PAGLIUCA: I'm going to 22 instruct you not to answer. 23 Q. Have you ever engaged in sex with 24 any female? 25



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Page 309 G Maxwell - Confidential 1 MR. PAGLIUCA: I'm going to 2 3 instruct you not to answer. MS. McCAWLEY: I want the record to 4 reflect that Ms. Maxwell's attorney is 5 directing her not to answer this series 6 of questions. 7 MR. PAGLIUCA: It definitely does. 8 Were you responsible for 9 Q. introducing Anuska to Jeffrey Epstein? 10 MR. PAGLIUCA: Objection to the 11 form and foundation. 12 I already testified that I don't A. 13 really recall Anuska. 14 Were you responsible for 15 Q. introducing Johanna to Jeffrey Epstein? 16 MR. PAGLIUCA: Objection to the 17 form and foundation. 18 Again, I don't like the Α. 19 characterization of introduction. Johanna 20 came to answer telephones. 21 When did you -- were you the person 22 0. who brought or introduced or met Johanna for 23 purposes of bringing her to Jeffrey Epstein's 24 25 home?

