

1 **Virginia Roberts Giuffre 2015 Court Testimony**

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3 **SEGMENT 1**

4 I grew up in Palm Beach, Florida. When I was little, I loved animals and wanted  
5 to be a veterinarian. But my life took a very different turn when adults began to be  
6 interested in having sex with me.

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8 In approximately 1999, when I was 15 years old, I met Ghislaine Maxwell. She is  
9 the daughter of Robert Maxwell, who had been a wealthy publisher in Britain. Maxwell  
10 asked that I come with her to Jeffrey Epstein’s mansion for the purposes of teaching me  
11 how to perform “massages” and to train me professionally in that area. Soon after that I  
12 went to Epstein’s home in Palm Beach on E1 Brillo Way.

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14 From the first time I was taken to Epstein’s mansion that day, his motivations and  
15 actions were sexual, as were Maxwell’s. My father was not allowed inside. I was brought up  
16 some stairs. There was a naked guy, Epstein, on the table in the room. Epstein and Maxwell  
17 forced me into sexual activity with Epstein. I was 15 years old at the time. He seemed to be  
18 in his 40s or 50s. I was paid \$200. I was driven home by one of Epstein’s employees.

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20 I came back for several days following and did the same sorts of sexual things for  
21 Epstein. After I did those things for Epstein, he and Maxwell said they were going to have  
22 me travel and were going to get an education for me. They were promising me the world,  
23 that I would travel with Epstein on his private jet and have a well-paid profession. Epstein  
24 said he would eventually match me up with a wealthy person so that I would be “set up” for  
25 life.

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27 So I started “working” exclusively for Epstein. He took me to New York on his  
28 big, private jet. We went to his mansion in New York City. I was shown to my room, a very  
29 luxurious room.

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31 SEGMENT 2

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33 The mansion was huge. I got scared because it was so big. Epstein brought me  
34 to a room with a massage parlor. To me, it looked like an S&M parlor. **Epstein made me**  
35 **engage** in sexual activities with him there. You can see how young I looked in the  
36 photograph below.

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38 **Epstein took me on a ferry boat** on one of the trips to New York City and there he  
39 took the picture above. I was approximately 15 or 16 years old at the time. Over the next  
40 few weeks, **Jeffrey Epstein and Ghislaine Maxwell trained me to do what they wanted,**  
41 including sexual activities and the use of sexual toys. The training was in New York and  
42 Florida, at Epstein's mansions. It was basically every day and was like going to school. I also  
43 had to have sex with Epstein many times.

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45 I was trained to be "everything a man wanted me to be." It wasn't just sexual  
46 training - **they wanted me to be able to cater to all the needs** of the men they were going  
47 to send me to. They said that they loved that I was very compliant and knew how to keep  
48 my mouth shut. **Epstein and Maxwell also told me that they wanted me to produce things**  
49 **for them** in addition to performing sex on the men. **They told to me to pay attention** to the  
50 details about what the men wanted, so I could report back to them.

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52 From very early on I was fearful of Epstein. Epstein told me he was a billionaire.

53 I told my mother that I was working for this rich guy, and she said "go, go far away." Epstein  
54 had promised me a lot, and I knew if I left I would be in big trouble. I also knew that I was a  
55 witness to a lot of illegal and very bad behaviour by Epstein and his friends. If I left Epstein,  
56 he knew all kinds of powerful people.

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### SEGMENT 3

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He could have had me killed or abducted, and I always knew he was capable of that if I did not obey him. He let me know that he knew many people in high places. Speaking about himself, he said “I can get away” with things. I was very scared, particularly since I was a teenager.

I visited and traveled with Jeffrey Epstein from 1999 through the summer of 2002, and during that time I stayed with him, as his sex slave, at each of his houses (really more like mansions) in locations including New York City, New York; the area of Santa Fe, New Mexico; Palm Beach, Florida; an island in the U.S. Virgin Islands; and Paris, France. I had sex with him often in these places and also with the various people he demanded that I have sex with. Epstein paid me for many of these sexual encounters. In fact, my only purpose for Epstein, Maxwell and their friends was to be used for sex.

To illustrate my connection to these places, I include four photographs taken of me in New Mexico (shown below). The first one is a museum in Santa Fe, New Mexico. We had gone sightseeing for the day. Epstein took this picture of me. I was approximately 17 at the time, judging from the looks of it. At the end of the day we returned to Epstein’s Zorro Ranch. The second picture is me on one of Epstein’s horses on the ranch in New Mexico. The following two are from wintertime in New Mexico.

When I was with him, Epstein had sex with underage girls on a daily basis. His interest in this kind of sex was obvious to the people around him. The activities were so obvious and bold that anyone spending any significant time at one of Epstein’s residences would have clearly been aware of what was going on.

85 SEGMENT 4

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87 Epstein's code word for sexual encounters was that it was a "massage". At times  
88 the interaction between Epstein and the girls would start in a massage room setting, it was  
89 always a sexual encounter and never just a massage.

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91 In addition to constantly finding underage girls to satisfy their personal desires,  
92 Epstein and Maxwell also got girls for Epstein's friends and acquaintances. Epstein  
93 specifically told me that the reason for him doing this was so that they would "owe him,"  
94 they would "be in his pocket," and he would "have something on them." I understood him  
95 to mean that when someone was in his pocket, they owed him favors. I also understood  
96 that Epstein thought he could get leniency if he was ever caught doing anything illegal, or  
97 more so that he could escape trouble altogether.

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99 Ghislaine Maxwell was heavily involved in the illegal sex. I understood her to be  
100 a very powerful person. She used Epstein's money and he used her name and connections  
101 to gain power and prestige. One way to describe Maxwell's role was as the "madame." She  
102 assumed a position of trust for all the girls, including me. She got me to trust her and  
103 Epstein. It turned out that Maxwell was all about sex all the time. She had sex with  
104 underage girls Virtually every day when I was around her, and she was very forceful.

105

106 I first had sexual activities with her when I was approximately 15 at the Palm Beach  
107 mansion. I had many sexual activities with her over the next several years in Epstein's  
108 various residences plus other exotic locations. I had sex with Maxwell in the Virgin Islands,  
109 New Mexico, New York, as well as France and many other locations.

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111 SEGMENT 5

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I also observed Maxwell have sex with dozens of underage girls. Maxwell took pictures of many of the underage girls. These pictures were sexually explicit. Maxwell kept the pictures on the computers in the various houses. She also made hard copies of these images and displayed them in the various houses. Maxwell had large amounts of child pornography that she personally made. Many times she made me sleep with other girls, some of whom were very young, for purposes of taking sexual pictures.

Harvard law professor Alan Dershowitz was around Epstein frequently. Dershowitz was so comfortable with the sex that was going on that he would even come and chat with Epstein while I was giving oral sex to Epstein. I had sexual intercourse with Dershowitz at least six times. The first time was when I was about 16, early on in my servitude to Epstein, and it continued until I was 19.

The first time we had sex took place in New York in Epstein's home. It was in Epstein's room (not the massage room). I was approximately 16 years old at the time. I called Dershowitz "Alan." I knew he was a famous professor.

The second time that I had sex with Dershowitz was at Epstein's house in Palm Beach. During this encounter, Dershowitz instructed me to both perform oral sex and have sexual intercourse. I also had sex with Dershowitz at Epstein's Zorro Ranch in New Mexico in the massage room off of the indoor pool area, which was still being painted.

We also had sex at Little Saint James Island in the U.S. Virgin Islands. I was asked to give Dershowitz a massage on the beach. Dershowitz then asked me to take him somewhere more private, where we proceeded to have intercourse.

139 SEGMENT 6

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141 Another sexual encounter between me and Dershowitz happened on Epstein's  
142 airplane. Another girl was present on the plane with us.

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144 I have recently seen a former Harvard law professor identified as Alan  
145 Dershowitz on television calling me a "liar." He is lying by denying that he had sex with me.  
146 That man is the same man that I had sex with at least six times.

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148 Epstein made me have sex with Prince Andrew several times. Prince Andrew,  
149 Maxwell, and I are shown in the photograph below. I had sex with him three times,  
150 including one orgy. I knew he was a member of the British Royal Family, but I just called him  
151 "Andy."

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153 One day when I was in London (specifically in a townhouse that is under  
154 Maxwell's name), I got news from Maxwell that I would be meeting a prince. Later that day,  
155 Epstein told me I was meeting a "major prince." Epstein told me "to exceed" everything I  
156 had been taught. He emphasized that whatever Prince Andrew wanted, I was to make sure  
157 he got.

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159 Eventually Prince Andrew arrived, along with his security guards. The guards  
160 then went out of the house and stayed out front in their car. It was just Epstein, Maxwell,  
161 and me inside alone with Andy. I was introduced to the Prince, and we kissed formally,  
162 cheek to cheek.

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164 There was a lot of legal discussion about Andy and his ex-wife ("Fergie"). Then the  
165 discussion turned to me. Maxwell said "guess how old she is." Prince Andrew guessed 17.  
166 Then we all went to a Chinese restaurant for dinner and then to Club Tramp, a  
167 fancy "members only" night club in central London. Andy arranged for alcohol to be  
168 provided to me at the club.

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170 SEGMENT 7

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172 Eventually we left. I rode with Epstein and Maxwell back to the townhouse.

173 On the way there, Epstein and Maxwell informed me that the Prince wanted to see “more  
174 of me” that night. Andy travelled in a separate car with his guards.

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176 We all arrived back at the town home and went upstairs. Epstein took a picture of  
177 me and Andy with my own camera. The picture above is that picture, which has been widely  
178 circulated on the internet. Andy has his left arm around my waist and is smiling. The picture  
179 was developed on March 13, 2001, and was taken sometime shortly before I had it  
180 developed. I was 17 years old at the time.

181

182 I wanted a picture with the prince because I was keeping in contact with my  
183 family. I had told my mom and my grandma that I was meeting Prince Andrew and that I’d  
184 take a picture for them. They told me to “be careful.” After the picture, Epstein and Maxwell  
185 kissed me and said to “have fun.” They left Andy and me alone upstairs. We went to the  
186 bathroom and bedroom, which were just steps away from where the picture was taken. We  
187 engaged in sexual activities there. Afterwards, Andy left quickly with his security.

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189 I chatted with Epstein about this the next day. I told him, “it went great.” Epstein said  
190 something to the effect of, “You did well. The Prince had fun.” I felt like I was being graded.  
191 It was horrible to have to recount all these events and have to try to meet all these needs  
192 and wants. I told Epstein about Andy’s sexual interests in feet. Epstein thought it was very  
193 funny. Epstein appeared to be collecting private information about Andy.

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195 SEGMENT 8

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197 When I got back from my trip, Epstein paid me more than he had paid me to be  
198 with anyone else — approximately \$15,000. That money was for what I had done and to  
199 keep my mouth shut about “working” with the Prince.

200

201 The second time I had sex with Prince Andrew was in Epstein’s New York  
202 mansion in spring 2001. I was 17 at time. Epstein called me down to his office. When I got  
203 there, Epstein was there, along with Maxwell, Johanna Sjoberg, and Andy. I was very  
204 surprised to see him again. Epstein and Maxwell were making lewd jokes about “Randy  
205 Andy”. I had the impression that Andy had come there to see Epstein and to have sex with  
206 me. There was no other apparent purpose for Andy to be there. I was told to go upstairs  
207 with Andy and to go to the room I thought of as the “dungeon” (the massage room, but it is  
208 really scary looking). I had sex with Andy there. I was only paid \$400 from Epstein for  
209 servicing Andy that time.

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211 The third time I had sex with Andy was in an orgy on Epstein’s private island in  
212 the U.S. Virgin Islands. I was around 18 at the time. Epstein, Andy, approximately eight other  
213 young girls, and I had sex together. The other girls all seemed and appeared to be under the  
214 age of 18 and didn’t really speak English. Epstein laughed about the fact they couldn’t really  
215 communicate, saying that they are the “easiest” girls to get along with. My assumption was  
216 that Jean Luc Brunel got the girls from Eastern Europe (as he procured many young foreign  
217 girls for Epstein). They were young and European looking and sounding.

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219 Afterwards we all had dinner by the cabanas. The other girls were chatting away among  
220 themselves, and Epstein and the Prince chatted together.

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222 SEGMENT 9

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224 I felt disgusted and went quickly to my own cabana that night and went to sleep. Prince  
225 Andrew must have flown out early the next morning, as I did not see him when I got up.

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227 I have seen Buckingham Palace's recent "emphatic" denial that Prince Andrew  
228 had sexual contact with me. That denial is false and hurtful to me. I did have sexual contact  
229 with him as I have described here — under oath. Given what he knows and has seen, I was  
230 hoping that he would simply voluntarily tell the truth about everything. I hope my attorneys  
231 can interview Prince Andrew under oath about the contacts and that he will tell the truth.

232

233 I also had sexual intercourse with Jean Luc Brunel many times when I was 16  
234 through 19 years old. He was another of Epstein's powerful friends who had many contacts  
235 with young girls throughout the world. In fact, his only similarity with Epstein and the only  
236 link to their friendship appeared to be that Brunel could get dozens of underage girls and  
237 feed Epstein's (and Maxwell's) strong appetite for sex with minors.

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239 Brunel ran some kind of modelling agency and appeared to have an arrangement  
240 with the U.S. Government where he could get passports or other travel documents for  
241 young girls. He would then bring these young girls (girls ranging in age from 12 to 24) to the  
242 United States for sexual purposes and farm them out to his friends, including Epstein.

243

244 Brunel would offer the girls "modelling" jobs. A lot of the girls came from poor  
245 countries or poor backgrounds, and he lured them in with a promise of making good money.  
246 I had to have sex with Brunel at Little St. James (orgies), Palm Beach, New York  
247 City, New Mexico, Paris, the south of France, and California. He did not care about  
248 conversation, just sex.

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SEGMENT 10

Jeffrey Epstein has told me that he has slept with over 1,000 of Brunel's girls, and everything that I have seen confirms this claim. Epstein, Brunel, and Maxwell loved orgies with kids — that is, having sexual interactions with many young teenagers at the same time. Sometimes as many as ten underage girls would participate in a single orgy with them. I personally observed dozens of these orgies. The orgies happened on Epstein's island in the U.S. Virgin Islands, in New Mexico, Palm Beach, and many other places. Most of the girls did not speak English. It was my understanding that the girls had been persuaded to come by Brunel offering them illegal drugs or a career in modelling. Brunel was one of the main procurers of girls. In addition to Ghislaine Maxwell, Sarah Kellen, and [----] were also involved in the orgies. At this stage, I am hopeful that these other women will come forward and tell the truth about everything because that will help prevent future similar abuse.

I have seen reports saying or implying that I had sex with former President Bill Clinton on Little Saint James Island. Former President Bill Clinton was present on the Island at a time when I was also present on the Island, but I have never had sexual relations with Clinton, nor have I ever claimed to have had such relations. I have never seen him have sexual relations with anyone.

I now understand that Epstein reached a non—prosecution agreement with the federal government in 2007 and pled guilty to two state crimes in June 2008. I now know that I was identified by the federal government as one of Epstein's and his co-conspirator's sexually abused victims. However, no one told me about those events until after they happened.

276 SEGMENT 11

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On September 3, 2008, the FBI sent a Victim notification letter to me. This was the first written communication I had received from the FBI. The letter is attached as Exhibit 1. The letter describes an agreement in which compensation would be made victims of Epstein’s sexual abuse. The letter also said that the federal government was going to “defer federal prosecution.” No one had told me about deferring federal prosecution before this.

In 2011, two FBI agents, called me in Australia and then came to meet me. They met me at the U.S. Consulate in Sidney. They seemed to be very professional and hard working. I thought to myself, “Wow, these people will do the right thing against the bad guys and protect me.”

The agents were mainly focused on Epstein but while there I provided them some information about others who were involved in illegal acts as well. I was aware that a false statement to these law enforcement officers was a crime and I told the truth — giving them the information that I could recall about the individuals they inquired about.

Epstein also trafficked me for sexual purposes to many other powerful men, including politicians and powerful business executives. Epstein required me to describe the sexual events that I had with these men presumably so that he could potentially blackmail them. I am still very fearful of these men today.

I will continue to cooperate fully in the investigation and prosecution of Epstein, Maxwell, or any of their friends who participated in the sexual abuse of minors.

302 SEGMENT 12

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304 I also hope that this information is treated in a way that will keep me safe from Epstein and  
305 other criminals identified here so as to encourage more Victims of similar crimes to come  
306 forward. If these crimes are not prosecuted, despite my volunteering this information and  
307 cooperation, then it may deter other similar Victims from coming forward.

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309 In this affidavit, I have tried to focus on how I was trafficked for sexual purposes.  
310 I have not described all of the details of the sexual activities Epstein forced me to have. Also,  
311 I have not described all of the details of the other events discussed here. If a judge wants  
312 me to present my information in more detail, including more specific descriptions of the  
313 sexual activities with the men Epstein sent me to, I could do so. I have directed my  
314 attorneys, Bradley J . Edwards and Paul G. Cassell, to pursue all reasonable and legitimate  
315 means to have criminal charges brought against these powerful people for the crimes they  
316 have committed against me and other girls. They are representing me in this case pro bone.

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318 Since I filed my motion in this case, my credibility has been attacked. I am telling  
319 the truth and will not let these attacks prevent me from exposing the truth of how I was  
320 trafficked for sex to many powerful people. These powerful people seem to think that they  
321 don't have to follow the same rules as everyone else. That is wrong. I hope that by coming  
322 forward, I can help expose the problem of sex trafficking and prevent the same sort of  
323 abuse and degradation that happened to me from happening to other girls.

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325 I declare under penalty of perjury that the foregoing is true and correct.  
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