

GHISLAINE MAXWELL – DEPOSITION OUTLINE

Recruitment

1. In the late summer or early fall of 2006, did you tell [REDACTED] to recruit a young woman to perform sexual acts on Jeffrey Epstein's behalf?
2. In the summer or fall of 2006, did [REDACTED] tell you that she had recruited a young woman by the name of [REDACTED] to perform sexual acts on Jeffrey Epstein's behalf?
3. Did you ever pay [REDACTED] to recruit females for Jeffrey Epstein?
4. Did you ever see Jeffrey Epstein pay [REDACTED] to recruit females for him?
5. Did you recruit young, including underage, females for Jeffrey Epstein?
6. Did Jeffrey Epstein tell you to recruit young, including underage, females for him?
7. Did you oversee and train other recruiters on how best to recruit females for sex for Jeffrey Epstein?
8. Did you ever promise young women money, shelter, transportation, gifts, employment, admission into educational institutions, education tuition, protection or other things in exchange for sex or sexual activities?
9. Did you ever hear Jeffrey Epstein promise young women money, shelter, transportation, gifts, employment, admission into educational institutions, education tuition, protection or other things in exchange for sex or sexual activities?
10. Did you ever demand that [REDACTED] recruit other females to participate in sexual acts with Jeffrey Epstein?
11. Did you ever hear Jeffrey Epstein demand that [REDACTED] recruit other females to participate in sexual acts with him or others?
12. Did you recruit [REDACTED] for the purpose of sex trafficking?

Threaten/Coerce/Fraudulently Promise

13. In February, March or April of 2007, did you threaten [REDACTED] that she had to perform sex acts at your direction?
14. To your knowledge, in February, March or April of 2007, did Jeffrey Epstein or anyone acting on his behalf threaten [REDACTED] that she had to perform sex acts at Jeffrey Epstein's direction?

15. In February, March or April of 2007, did you ever threaten [REDACTED] with physical force if she did not provide body massages to Jeffrey Epstein?
16. In February, March or April of 2007, did you ever threaten [REDACTED] with physical force if she did not have sex with Jeffrey Epstein?
17. Did you ever coerce, threaten or intimidate any young women to perform sex or sexual activities for Jeffrey Epstein?
18. Did Jeffrey Epstein ever tell you to coerce, threaten or intimidate any young women to perform sex or sexual activities for him or others?
19. Did you ever hear Jeffrey Epstein coerce, threaten or intimidate any young women to perform sex or sexual activities for him or others?
20. Did you ever hear Jeffrey Epstein threaten [REDACTED] with physical harm?
21. Did you ever physically restrain [REDACTED]?
22. Did you ever see Jeffrey Epstein restrain [REDACTED]?
23. Did you promise [REDACTED] that in exchange for performing sexual acts for Jeffrey Epstein or others that you would assist her in gaining admission to the Fashion Institute of Technology?
24. Did you ever hear Jeffrey Epstein promise [REDACTED] that in exchange for performing sexual acts for him or others that he would assist her in gaining admission to the Fashion Institute of Technology?

Weight

25. In February, March and April of 2007, did you tell [REDACTED] that she had to lose weight?
26. To your knowledge, in February, March and April of 2007, did Jeffrey Epstein tell [REDACTED] that she had to lose weight?
27. Did [REDACTED] need to lose weight to pursue her modeling career?

Passport/Travel

28. At any time in 2006 or 2007, did you seize any passport belonging to [REDACTED]?

29. To your knowledge, at any time in 2006 or 2007, did Jeffrey Epstein seize any passport belonging to [REDACTED]?
30. To your knowledge, at any time in 2006 or 2007, did Jeffrey Epstein instruct anyone to seize any passport belonging to [REDACTED]?
31. Did you take possession or control of [REDACTED] passport to induce or coerce her into performing sexual acts with Jeffrey Epstein and others?
32. Did you ever see Jeffrey Epstein take possession or control of [REDACTED] passport to induce or coerce her into performing sexual acts for him and others?
33. Did you ever stop [REDACTED] from leaving New York when she wanted?
34. Did you ever stop [REDACTED] from returning to New York when she wanted?
35. Was [REDACTED] restricted from leaving New York at any time?
36. Did you ever inhibit [REDACTED] from traveling within the USA or outside of it in any way?

Phone Calls to South Africa

37. While [REDACTED] was in South Africa in February of 2007, did you ever call her parents?
38. Did you speak to her parents?
39. Did you promise her parents that if she came back to the United States that you would get her modeling contracts?
40. Did you promise her parents that if she came back to the United States that you would get her into the Fashion Institute of Technology?

Sex Trafficking/Commercial Sex Acts

41. Did [REDACTED] perform sexual acts at your direction or on your behalf?
42. Did [REDACTED] perform sexual acts at Jeffrey Epstein's direction or on his behalf?
43. In 2006 and 2007, did you provide [REDACTED] with money or other things of value in exchange for performing sexual acts?
44. To your knowledge, in 2006 and 2007, did Jeffrey Epstein provide [REDACTED] with money or other things of value in exchange for performing sexual acts?

45. Did you, in February, March and April of 2007, provide [REDACTED] with money and other things of value in exchange for performing sexual acts?
46. To your knowledge, did Jeffrey Epstein, in February, March and April of 2007, provide [REDACTED] with money or other things of value in exchange for performing sexual acts?
47. In February, March and April of 2007, did you instruct [REDACTED] to perform sex acts with persons other than yourself?
48. To your knowledge, in February, March and April of 2007, did Jeffrey Epstein instruct [REDACTED] to perform sex act with persons other than himself?
49. In February, March and April of 2007, did you have sex with [REDACTED]?
50. To your knowledge, in February, March and April of 2007, did Jeffrey Epstein have sex with [REDACTED]?
51. In February, March and April of 2007, were there other young women, other than [REDACTED], who you were paying or providing things of value in exchange for the performance of sex acts?
52. To your knowledge, in February, March and April of 2007, were there other young women, other than [REDACTED], who Jeffrey Epstein was paying or providing things of value in exchange for the performance of sex acts?
53. In February, March and April of 2007, did you employ young women, other than [REDACTED], to perform sex acts?
54. To your knowledge, in February, March and April of 2007, did Jeffrey Epstein employ young women, other than [REDACTED], to perform sex acts?
55. To your knowledge, in February, March and April of 2007, were there females under the age of 18 who performed sex acts at Jeffrey Epstein's residence in Florida?
56. To your knowledge, in February, March and April of 2007, were there females under the age of 18 who performed sex acts at Jeffrey Epstein's residence in New York City for people other than Jeffrey Epstein?
57. To your knowledge, in February, March and April of 2007, were there females under the age of 18 who performed sex acts at Jeffrey Epstein's residence in Florida for people other than Jeffrey Epstein?

58. To your knowledge, in February, March and April of 2007, were there females under the age of 18 who Jeffrey Epstein directed to perform sex acts at his residence in New York City for people other than himself?
59. In February, March and April of 2007, were there females under the age of 18 who you directed to perform sex acts at Jeffrey Epstein's residence in Florida for people other than Jeffrey Epstein?
60. To your knowledge, in February, March and April of 2007, were there females under the age of 18 who Jeffrey Epstein directed to perform sex acts at his residence in Florida for people other than himself?
61. To your knowledge, did Jeffrey Epstein participate in a sex trafficking enterprise?
62. To your knowledge, does Jeffrey Epstein provide females under the age of 18 to his friends for sexual purposes in order to secure social, business and other contacts as well as other things of value?
63. Has Jeffrey Epstein ever asked you to provide a female under the age of 18 to his friends for sexual purposes in order to secure social, business and other contacts as well as other things of value?
64. To your knowledge, does Jeffrey Epstein provide females over the age of 18 to his friends for sexual purposes in order to secure social, business and other contacts as well as other things of value?
65. Has Jeffrey Epstein ever asked you to provide a female over the age of 18 to his friends for sexual purposes in order to secure social, business and other contacts as well as other things of value?
66. Did you ever conspire with the other named Defendants to force [REDACTED] to have sex with Jeffrey Epstein?
67. Did you ever conspire with the other named Defendants to coerce [REDACTED] to have sex with Jeffrey Epstein?
68. Did you ever conspire with the other named Defendants to fraudulently promise [REDACTED] either an education or a modeling contract, so she would have sex with Jeffrey Epstein?
69. Did you ever sex traffic [REDACTED]?
70. Were you ever involved in a scheme to make [REDACTED] engage in commercial sex acts?

