

# **EXHIBIT A**

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

\*\*CONFIDENTIAL\*\*

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 APPEARANCES:  
 2 FARMER JAFFE WEISSING EDWARDS FISTOS &  
 3 LEHRMAN, P.L.  
 4 Attorneys for Plaintiff  
 5 425 N. Andrews Avenue  
 6 Fort Lauderdale, Florida 33301  
 7 BY: BRAD EDWARDS, ESQUIRE

8 HADDON MORGAN FOREMAN  
 9 Attorneys for Defendant  
 10 150 East 10th Avenue  
 11 Denver, Colorado 80203  
 12 BY: JEFFREY S. PAGLIUCA, ESQUIRE

13 FREEMAN LEWIS LLP  
 14 Attorneys for the Witness  
 15 228 East 48th Street  
 16 New York, New York 10017  
 17 BY: ROBERT LEWIS, ESQ.

18 Also Present:  
 19 RODOLFO DURAN, Videographer

1 R. Rizzo - Confidential  
 2 Rizzo.  
 3 THE VIDEOGRAPHER: Will the court  
 4 reporter please swear in the witness.  
 5 RINALDO RIZZO,  
 6 called as a witness, having been duly  
 7 sworn by a Notary Public, was  
 8 examined and testified as follows:  
 9 EXAMINATION BY  
 10 MR. EDWARDS:  
 11 Q. Mr. Rizzo, can you tell us your  
 12 full name for the record?  
 13 A. Rinaldo A. Rizzo.  
 14 Q. And what is your date of birth?  
 15 A. [REDACTED]  
 16 Q. What is your address?  
 17 A. [REDACTED]  
 18 [REDACTED].  
 19 Q. What is your educational  
 20 background?  
 21 A. I have a management degree with a  
 22 minor in business law from Texas A&M  
 23 University, and I have a degree in applied  
 24 science in hospitality and culinary arts from  
 25 the Culinary Institute of America.

1 THE VIDEOGRAPHER: This is DVD No.  
 2 1 in the video-recorded deposition of  
 3 Rinaldo Rizzo, in the matter of Virginia  
 4 Giuffre versus Ghislaine Maxwell, in the  
 5 United States District Court, Southern  
 6 District of New York. This deposition  
 7 is being held at 333 Main Street in  
 8 Armonk, New York, June 10, 2016, at  
 9 approximately 10:06 a.m.  
 10 My name is Rodolfo Duran. I am the  
 11 legal video specialist. The court  
 12 reporter is Leslie Fagin, and we're both  
 13 in association with Magna Legal  
 14 Services.  
 15 Will counsel please introduce  
 16 themselves.  
 17 MR. EDWARDS: Brad Edwards. I  
 18 represent the plaintiff, Virginia  
 19 Giuffre.  
 20 MR. PAGLIUCA: Jeff Pagliuca,  
 21 appearing on behalf of Ms. Maxwell.  
 22 MR. LEWIS: Robert Lewis, with the  
 23 firm of Freeman Lewis, LLP,  
 24 representing the deponent, Rinaldo

1 R. Rizzo - Confidential  
 2 Q. Are you married?  
 3 A. Yes.  
 4 Q. Who are you married to?  
 5 A. Debra Rizzo.  
 6 Q. How long have you been married?  
 7 A. We've been together 27 years, so  
 8 22.  
 9 Q. And do you have children?  
 10 A. Yes.  
 11 Q. How many?  
 12 A. One.  
 13 Q. Since graduating, what has been  
 14 your profession?  
 15 A. It is called private service or  
 16 domestic service.  
 17 Q. What does that mean?  
 18 A. My role is to work within a family  
 19 as a desired position that's offered to me,  
 20 and most of it's been in management or  
 21 support of household staff.  
 22 Q. Was there a time when you worked in  
 23 the household of Glenn Dubin and Eva Anderson  
 24 Dubin?  
 25 A. Yes.

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1 R. Rizzo - Confidential  
 2 fired abruptly at this point, right?  
 3 A. Correct.  
 4 Q. You went and retained counsel to  
 5 sue the Dubins, their entity and [REDACTED],  
 6 all of them, right?  
 7 A. Correct.  
 8 Q. I take it you were deposed in  
 9 connection with that litigation, correct?  
 10 A. Correct.  
 11 Q. Now, during that litigation, that  
 12 litigation meaning the reference in Exhibit  
 13 3, 13-cv-8864, did you ever tell anyone about  
 14 the interactions with Mr. Epstein that you  
 15 described here today?  
 16 A. No, I did not.  
 17 Q. That was not a part of your  
 18 lawsuit, correct?  
 19 A. Could you restate the question? I  
 20 don't understand what --  
 21 Q. You didn't raise that as an issue  
 22 as to why you were suing the Dubins in 2013,  
 23 right?  
 24 A. No, I did not.  
 25 THE VIDEOGRAPHER: The time is

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1 R. Rizzo - Confidential  
 2 12:41. We are going off the record.  
 3 (Recess.)  
 4 THE VIDEOGRAPHER: The time is  
 5 12:47 p.m. We are back on the record.  
 6 This begins DVD No. 3.  
 7 BY MR. PAGLIUCA:  
 8 Q. I just have a few more questions.  
 9 I'm going to finish off with your employment.  
 10 So after this lawsuit was  
 11 concluded, referenced in Exhibit 3, have you  
 12 worked since then?  
 13 A. No, I have not.  
 14 Q. Has your wife worked since then?  
 15 A. On and off, yes.  
 16 Q. How is it that you are currently  
 17 supporting yourself?  
 18 A. I'm on disability.  
 19 Q. That's as a result of your back  
 20 injury?  
 21 A. Yes, and my hip injury.  
 22 Q. I didn't realize you had a hip  
 23 injury, I'm sorry. Is that Social Security  
 24 disability?  
 25 A. Yes, it is.

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1 R. Rizzo - Confidential  
 2 Q. The lawsuit with the Dubins  
 3 referenced in Exhibit 3 was settled, I take  
 4 it?  
 5 A. Correct.  
 6 Q. That was pursuant to a confidential  
 7 settlement agreement?  
 8 A. Correct.  
 9 Q. And I am assuming that you received  
 10 a sum of money to settle that litigation, is  
 11 that correct?  
 12 A. Correct.  
 13 Q. And I'm not going to ask you the  
 14 details about that, but in case I need to do  
 15 something, let me put it this way. If I  
 16 choose to subpoena that settlement agreement  
 17 from the Dubins, are you going to have any  
 18 objection to that, or is it all right if we  
 19 do that as far as you are concerned?  
 20 A. I would have to discuss it with my  
 21 lawyer.  
 22 MR. PAGLIUCA: I can talk to you  
 23 about that, if we decide to do it.  
 24 Q. I just want to turn now, and this  
 25 is the last series of questions I have, what

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1 R. Rizzo - Confidential  
 2 you did in advance of coming here today.  
 3 Have you talked to Mr. Edwards  
 4 before?  
 5 A. Yes.  
 6 Q. And when have you talked to Mr.  
 7 Edwards?  
 8 A. I don't recall the exact date and  
 9 time.  
 10 Q. Did Mr. Edwards call you or did you  
 11 call Mr. Edwards first?  
 12 A. I called him.  
 13 Q. When did you call Mr. Edwards?  
 14 A. I don't recall the exact date and  
 15 time.  
 16 Q. Years ago, days ago, months ago?  
 17 A. It's been at least over a year.  
 18 Q. Why did you call Mr. Edwards?  
 19 A. At the time I was having a very  
 20 hard time with my attorney. My wife and I  
 21 had discussed the issue. As my wife put it,  
 22 we needed an attorney with balls and she had  
 23 been keeping track of the Jeffrey Epstein  
 24 issue, and basically in our conversation --  
 25 MR. LEWIS: Let me stop you there.

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1 R. Rizzo - Confidential  
 2 There is a privilege of spousal  
 3 privilege, so please don't disclose  
 4 conversations you had with your wife.  
 5 THE WITNESS: Sorry.  
 6 MR. LEWIS: You can answer the  
 7 question why you called, but you don't  
 8 need to disclose anything about  
 9 conversations with your wife.  
 10 A. I was looking for an attorney that  
 11 basically could handle this kind of  
 12 situation, and I felt like, from what I had  
 13 read, that Mr. Edwards was probably someone I  
 14 needed to attain, if I could.  
 15 Q. And so the, you referenced  
 16 dissatisfaction with an attorney. I'm  
 17 assuming that was the attorney that filed  
 18 this 13-cv-8664 action, is that correct?  
 19 A. Correct.  
 20 Q. So you weren't happy with that  
 21 lawyer and you were looking for a more  
 22 aggressive lawyer?  
 23 A. Correct, or someone that could work  
 24 with my lawyer.  
 25 Q. The point being you were looking to

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1 R. Rizzo - Confidential  
 2 recover some form of compensation, I take it,  
 3 from the Dubins or Mr. Epstein?  
 4 A. I was hoping -- how does Mr.  
 5 Epstein --  
 6 Q. I don't know. I'm asking the  
 7 question.  
 8 A. That's incorrect.  
 9 Q. You were seeking to get  
 10 compensation from the Dubins, though?  
 11 A. Correct.  
 12 Q. And that was the point of you  
 13 calling Mr. Edwards is that, however you  
 14 learned it, you learned about the Epstein  
 15 litigation and you knew Mr. Edwards was  
 16 involved in the Epstein litigation?  
 17 A. Correct.  
 18 Q. The point of you contacting Mr.  
 19 Edwards was to see if he could represent you  
 20 in some litigation involving the Dubins in  
 21 which you would collect money, is that right?  
 22 A. Correct.  
 23 Q. And so when you called Mr. Edwards,  
 24 what do you recall telling him?  
 25 MR. LEWIS: At this point, I object

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1 R. Rizzo - Confidential  
 2 on attorney/client privilege grounds.  
 3 The conversation is privileged for the  
 4 purpose of seeking legal advice.  
 5 MR. PAGLIUCA: I don't understand.  
 6 Mr. Edwards is the lawyer for the  
 7 witness.  
 8 MR. LEWIS: I am the lawyer for the  
 9 witness.  
 10 MR. PAGLIUCA: I know, I'm not  
 11 asking about you.  
 12 MR. LEWIS: He called Mr. Edwards  
 13 for the purpose to determine whether Mr.  
 14 Edwards could represent him in some  
 15 capacity in that other lawsuit, so the  
 16 conversations is privileged.  
 17 MR. PAGLIUCA: I'm going to  
 18 disagree, and you know we may need to  
 19 revisit that issue respectfully.  
 20 MR. LEWIS: Fair enough.  
 21 MR. PAGLIUCA: Let me put some  
 22 parameters on this that don't ask for  
 23 communications.  
 24 MR. LEWIS: Ask a question and I  
 25 will object or not.

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1 R. Rizzo - Confidential  
 2 Q. I think you said you called Mr.  
 3 Edwards about a year ago?  
 4 A. More or less, correct.  
 5 Q. I didn't print out the docket  
 6 sheet, but do you recall when you settled the  
 7 13-cv-8664 case?  
 8 A. To the best of my recollection, I  
 9 think it was in December.  
 10 Q. Of?  
 11 A. I don't recall. I mean, it's last  
 12 year.  
 13 Q. Without telling me what you told  
 14 Mr. Edwards, what was the purpose of your  
 15 calling -- I think you already told me this,  
 16 so I won't reask it. Never mind.  
 17 Did you just speak with Mr. Edwards  
 18 over the phone?  
 19 A. Correct, yes.  
 20 Q. And I take it Mr. Edwards did not  
 21 become your lawyer in connection with any  
 22 litigation against the Dubins, correct?  
 23 MR. LEWIS: You may answer that.  
 24 A. Correct.  
 25 Q. And Mr. Edwards in some fashion

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1 R. Rizzo - Confidential  
 2 indicated to you that he wasn't going to be  
 3 your lawyer in connection with litigation,  
 4 correct?  
 5 MR. LEWIS: Objection. Do not  
 6 answer that on privilege grounds.  
 7 Q. Mr. Edwards never became your  
 8 lawyer, is that right?  
 9 A. Correct.  
 10 Q. After that conversation, did you  
 11 have any -- after you understood that Mr.  
 12 Edwards was not your lawyer, did you have  
 13 further conversations with Mr. Edwards?  
 14 A. No, I did not.  
 15 Q. You may object to this, but I need  
 16 to ask this question. In the first  
 17 conversation that you had with Mr. Edwards,  
 18 did you tell Mr. Edwards the things that  
 19 you've told us here today?  
 20 MR. LEWIS: Objection. Do not  
 21 answer.  
 22 MR. PAGLIUCA: Privilege?  
 23 MR. LEWIS: Yes.  
 24 MR. PAGLIUCA: So just so the  
 25 record is clear, it seems to me this

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1 R. Rizzo - Confidential  
 2 would be a subject matter waiver of  
 3 everything that he has talked about. I  
 4 don't know why it makes a difference if  
 5 he is talking about it now and he told  
 6 Mr. Edwards, I think he can talk about  
 7 what he said to Mr. Edwards. It seems  
 8 to me there is a waiver here.  
 9 MR. LEWIS: You are presuming what  
 10 he said to Mr. Edwards. And secondly,  
 11 just because, even if that were the  
 12 case, I'm not saying it is, just because  
 13 you testify to incidents which you tell  
 14 your attorney about doesn't mean the  
 15 disclosures to your attorney are not  
 16 privileged.  
 17 MR. PAGLIUCA: Fair enough. We can  
 18 argue about this later if we need to.  
 19 BY MR. PAGLIUCA:  
 20 Q. Other than Mr. Edwards and your  
 21 wife and your current attorney, have you  
 22 talked to anyone else about the things that  
 23 you've talked about here today?  
 24 A. No, I have not.  
 25 Q. I think you answered this question,

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1 R. Rizzo - Confidential  
 2 but I want to make sure.  
 3 After that first conversation with  
 4 Mr. Edwards, did you speak with Mr. Edwards  
 5 again in advance of this deposition today?  
 6 MR. LEWIS: You may answer that.  
 7 A. No, I have not.  
 8 Q. Do you know, did Mr. Edwards  
 9 provide a list of questions to your lawyer,  
 10 who is here today, for you to provide those  
 11 answers to your lawyer to give to Mr.  
 12 Edwards?  
 13 MR. LEWIS: I advise the witness to  
 14 only answer that question to the extent  
 15 he knows it outside of any conversations  
 16 that he might have had with me, which  
 17 are privileged.  
 18 A. No.  
 19 Q. So let me explain that question,  
 20 and here is my issue with that, and I don't  
 21 know if this happened or didn't happen, but  
 22 if there are questions that are given  
 23 proposed to you by Mr. Edwards and you give  
 24 them to the client with the expectation he is  
 25 going to give that information to you to give

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1 R. Rizzo - Confidential  
 2 to Mr. Edwards, it's not privileged.  
 3 MR. LEWIS: I can represent that  
 4 didn't happen.  
 5 MR. PAGLIUCA: That solves the  
 6 problem.  
 7 Q. I'm just closing the loop on this  
 8 and then we are done.  
 9 Have you spoken to anyone who is  
 10 affiliated with Mr. Edwards, either another  
 11 lawyer in his office, paralegal, an  
 12 investigator, about the things that you've  
 13 talked about here today?  
 14 A. No, I have not.  
 15 MR. PAGLIUCA: That's all I have.  
 16 MR. EDWARDS: I don't have any  
 17 questions. I appreciate you taking the  
 18 time. Sorry about your injury.  
 19 THE VIDEOGRAPHER: The time is  
 20 12:58 p.m. and we are going off the  
 21 record.  
 22 (Recess.)  
 23 THE VIDEOGRAPHER: Back on the  
 24 record.  
 25 MR. PAGLIUCA: The parties have