

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2, Case No: 08-CV-80119
Plaintiff,
Vs
JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 3, Case NO: 08-CV-80232
Plaintiff,
Vs
JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 4, Case No: 08-CV-80380
Plaintiff,
Vs.
JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 5, Case No: 08-CV-80381
Plaintiff,
Vs
JEFFREY EPSTEIN,
Defendant.

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1 A. I don't remember, sir.
 2 Q. The next page is a message in the upper
 3 left dated January 13, 2005, from C.W. Correct?
 4 A. Yes.
 5 Q. That's the same C. that we've been
 6 talking about. Correct?
 7 A. Yes.
 8 Q. That was at 7:30 p.m. Correct?
 9 A. Yes.
 10 Q. And you don't recall what that particular
 11 call was about. Right?
 12 A. No, sir.
 13 Q. The message dated January 20, 2005, from
 14 Maria. Do you see that on the bottom right?
 15 A. Yes.
 16 Q. Do you know who that is?
 17 A. I think I have a different page.
 18 Q. You're a little ahead of me. January 20,
 19 2005.
 20 MR. CRITTON: I think that's page 31.
 21 THE WITNESS: I don't remember who she
 22 was, sir.
 23 BY MR. MERMELSTEIN:
 24 Q. You don't recall what that message was
 25 about?

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1 A. No, sir.
 2 Q. What about the next page there is a
 3 message that Eva called?
 4 A. Yes.
 5 Q. Dated January 21, 2005?
 6 A. Yes.
 7 Q. Do you know who Eva is?
 8 A. Yes.
 9 Q. Who is Eva?
 10 A. The assistant comptroller from the New
 11 York office.
 12 Q. Do you remember her last name?
 13 A. Polish last name I guess. She was
 14 Russian. She is Russian actually.
 15 Q. Did you ever travel to any other
 16 residences that Mr. Epstein had?
 17 A. No.
 18 Q. Are you aware he had a residence in the
 19 Virgin Islands?
 20 MR. CRITTON: Form.
 21 THE WITNESS: Yes.
 22 BY MR. MERMELSTEIN:
 23 Q. And would he sometimes travel to that
 24 residence from Palm Beach?
 25 A. Yes.

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1 Q. Okay. Do you recall on any occasion who
 2 would travel with him to the Virgin Islands?
 3 MR. CRITTON: Form.
 4 THE WITNESS: No, sir.
 5 BY MR. MERMELSTEIN:
 6 Q. I think we were talking about the money
 7 before, the household account, sometimes you gave
 8 gifts?
 9 A. Yes, I was told to buy some gifts.
 10 Q. For whom?
 11 A. For the guests.
 12 Q. Okay. And what kind of gifts?
 13 A. Shoes, sweaters, clothes.
 14 Q. So were you instructed to buy something
 15 in particular at a particular store?
 16 A. They would go to the store, if they like
 17 something I will go after and pay them and
 18 retrieve it.
 19 Q. Okay. So would this be a girl who was
 20 staying at the house?
 21 A. Yes.
 22 Q. Okay. This was one of the girls who
 23 travelled with Mr. Epstein to Palm Beach.
 24 Correct?
 25 A. Yes.

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1 Q. And so Mr. Epstein would instruct you to
 2 go shopping with this girl?
 3 A. Yes.
 4 Q. And instructed you to pay for whatever it
 5 is she wanted to buy?
 6 A. Yes.
 7 Q. Was there a price limit or anything of
 8 that nature?
 9 A. No, sir.
 10 Q. So when the girl decided what she wanted
 11 you would --
 12 A. I would write them a check.
 13 Q. In that instance you would pay by check?
 14 A. Yes.
 15 Q. Any other instances where you gave gifts
 16 to girls at the instruction of Mr. Epstein?
 17 A. No. I was just told, you know, when they
 18 told me I will buy the item.
 19 Q. I'm sorry?
 20 A. You know, when I was told to purchase
 21 this item for them, you know, I will do that, but
 22 not on any other occasions.
 23 Q. What do you mean not in any locations?
 24 A. Any other occasions.
 25 Q. Not any other occasions. Okay. Did you

25 (Pages 94 to 97)

Page 98 1 ever buy flowers for a girl? 2 A. Yes, sir. 3 Q. Tell me about that. 4 A. I was told to buy flowers and roses for a 5 girl performing in high school. 6 Q. Which girl was that? 7 A. I don't remember the name, sir. 8 Q. What was Mr. Epstein's relationship to 9 this girl? 10 MR. CRITTON: Form. 11 THE WITNESS: I think she was an 12 acquaintance, friend. 13 BY MR. MERMELSTEIN: 14 Q. She was a friend? 15 A. Yes, sir. 16 Q. Now, she was performing at the high 17 school in what capacity? 18 A. There was like a -- like a play in the 19 graduation for high school. 20 Q. A play for graduation? 21 A. Yes, in the high school theatre there was 22 some kind of performance. 23 Q. Was it like a theatre production? 24 A. Yeah, something like that. I didn't go 25 inside so I didn't know what was going on inside.	Page 100 1 Q. Now, you said you never went inside the 2 theatre? 3 A. No, sir. 4 Q. Okay. How did you get to the flower 5 store? 6 A. I called the girl to her cell and she 7 will come to the back door and I give her the 8 flowers. 9 Q. Was anyone else around at the time? 10 A. No, sir. 11 Q. And you mentioned this was a girl you had 12 seen before? 13 A. Yes. 14 Q. Was this girl who had come to give 15 massages to Mr. Epstein? 16 MR. CRITTON: Form. 17 THE WITNESS: I don't know if she was 18 doing massages but she was at the house. 19 BY MR. MERMELSTEIN: 20 Q. What would she have been there for? 21 A. To visit him. 22 Q. This was a high school girl who was 23 coming to visit Mr. Epstein at the house? 24 A. She came to the house, I open the door 25 and I left, you know.
Page 99 1 Q. Why do you say it was for graduation? 2 A. Because everybody was the graduation 3 outside, there were parents, there were a lot of 4 people at the school. 5 Q. Okay. A lot of high schools have theatre 6 production companies and they put on plays. 7 Correct? 8 MR. CRITTON: Form. 9 THE WITNESS: It was towards the end of 10 the year. Well, I think I overheard that 11 there was a graduation performance of some 12 kind. 13 BY MR. MERMELSTEIN: 14 Q. But you didn't go in so you don't know? 15 A. No, sir. 16 Q. But this was a high school student you 17 were bringing the flowers to. Is that correct? 18 A. Yes. 19 Q. Had you seen this girl before at the El 20 Brillo Way property? 21 A. Yes, sir. 22 Q. You had seen her a number of times? 23 A. Yes, sir. 24 Q. Do you recall her name? 25 A. I don't remember her name, sir.	Page 101 1 Q. Did you take her to the kitchen like you 2 did -- 3 A. Yes. 4 Q. So you brought her to the kitchen just 5 like you did for the girls who gave him massages. 6 Correct? 7 A. Yes, sir. 8 Q. Did you ever pay her? 9 A. I don't remember, sir, but probably I 10 did. 11 MR. CRITTON: Form, move to strike, 12 speculation. 13 BY MR. MERMELSTEIN: 14 Q. Why do you say you probably did? 15 A. Because I was the only one paying -- 16 well, not the only one but, you know, but chances 17 are I paid her but I don't remember that 18 particular instance that I gave her money. 19 Q. Is it fair to say that the girls who came 20 to the Palm Beach residence, these are not the 21 girls who are staying there, the girls who came -- 22 were there to give massages. Correct? 23 MR. CRITTON: Form. 24 THE WITNESS: Yes. 25 BY MR. MERMELSTEIN:

26 (Pages 98 to 101)

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1 written down anywhere?
 2 A. No.
 3 Q. It's my understanding that C. and T.
 4 either came to his house alone to visit with Mr.
 5 Epstein or brought other girls in their age group
 6 to Mr. Epstein.
 7 Were you familiar with that type of
 8 recruitment process of girls bringing other girls?
 9 MR. CRITTON: Form.
 10 THE WITNESS: Yes.
 11 BY MR. [REDACTED]:
 12 Q. Can you tell me more about what you know
 13 about girls bringing other girls that are
 14 relatively the same age to come to Jeffrey
 15 Epstein's house and to use your words, have a good
 16 time?
 17 MR. CRITTON: Form.
 18 THE WITNESS: It's hard to know who they
 19 knew. But I think that was -- they feel
 20 better themselves when they're in a group
 21 than going by themselves, but I don't know
 22 somebody recruiting.
 23 BY MR. [REDACTED]:
 24 Q. Okay. And you've talked about, at least
 25 referred to yourself I believe to the police and

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1 for now we'll call it a massage -- as well as
 2 anybody who brought that person over to the house,
 3 they would both get paid cash. Are you familiar
 4 with that?
 5 MR. CRITTON: Form.
 6 THE WITNESS: No.
 7 BY MR. [REDACTED]:
 8 Q. If C. brought another girl over to the
 9 house and C. stayed downstairs but this other girl
 10 went upstairs with Mr. Epstein, which one would
 11 you pay?
 12 A. I don't know because I was told who to
 13 pay.
 14 Q. And [REDACTED] always told you?
 15 A. Sarah told me pay so and so.
 16 Q. So if we were going to ask anybody else
 17 about the exact method in terms of who would get
 18 paid and for what, who would the people be? I
 19 mean, other than Mr. Epstein who else could we ask
 20 these questions?
 21 A. Sarah.
 22 Q. [REDACTED]?
 23 A. Yes.
 24 Q. She would know this?
 25 A. Yes.

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1 as well today as a human ATM machine. Right?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Something like that. I was
 4 supposed to carry cash at all times.
 5 BY MR. [REDACTED]:
 6 Q. One of the primary reasons why you
 7 carried cash was to pay the girls in this age
 8 group of C. and T. for whatever happened at the
 9 house. Right?
 10 MR. CRITTON: Form.
 11 THE WITNESS: Yes.
 12 BY MR. [REDACTED]:
 13 Q. That's a fair statement. Right?
 14 MR. CRITTON: Form.
 15 THE WITNESS: Yes.
 16 BY MR. [REDACTED]:
 17 Q. Okay. And when C., let's use her for
 18 example, would bring somebody else to the house,
 19 did you pay C. as well as whomever she brought to
 20 the house, pay them both?
 21 A. No, I pay only one person.
 22 Q. Okay. My understanding, and tell me if
 23 this is wrong or you can corroborate this, is that
 24 Mr. Epstein would pay the girl that was actually
 25 performing whatever was happening in the room --

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1 Q. What about Ghislaine Maxwell?
 2 MR. CRITTON: Form.
 3 THE WITNESS: You're talking about the
 4 boss. I don't know.
 5 BY MR. [REDACTED]:
 6 Q. To your knowledge was Ghislaine Maxwell
 7 aware of these girls that are in the age group of
 8 C. and T. coming to Jeffrey Epstein's house to
 9 have a good time?
 10 MR. CRITTON: Form.
 11 THE WITNESS: I have to say something.
 12 Mrs. Maxwell called me and told me not to
 13 ever discuss or contact her again in a
 14 threaten way.
 15 BY MR. [REDACTED]:
 16 Q. When was this?
 17 A. Right after I left because I call one of
 18 the friends for a job and she told me this, but,
 19 you know, I feel intimidated and so I want to keep
 20 her out.
 21 Q. What exactly did she say? First of all,
 22 was this a telephone call?
 23 A. Yes, she was in New York.
 24 Q. She called you on your cell phone?
 25 A. Yes.

43 (Pages 166 to 169)

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1 Q. Is this the cell phone that was issued to
2 you by Mr. Epstein?
3 A. No, it was my personal phone. I was
4 already --
5 Q. Gone?
6 A. Yeah, this is three, four months down the
7 road.
8 Q. So if you left in --
9 A. February, March -- it was May or June.
10 Q. Of 2005?
11 A. Yes.
12 Q. And you got a call from Ghislaine Maxwell
13 out of the blue?
14 A. Yes.
15 Q. And do you know what prompted that
16 telephone call?
17 A. Because I contact somebody in New York to
18 get a job.
19 Q. Who was that person?
20 A. I contact Jean-Luc and I contact Eva, the
21 Swedish girl, she used to be very good friends
22 with Mr. Epstein because she asked me she need
23 somebody in New York.
24 Q. What does Eva do?
25 A. Eva was a model many years ago and he

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1 married -- Eva is the mother of the girl who was
2 on the wall.
3 Q. Who is on the wall of Mr. Epstein's
4 house?
5 A. Yeah.
6 Q. All right. There is a younger girl model
7 that's on the wall of Mr. Epstein's house and this
8 lady Eva is her mother?
9 A. Yes.
10 Q. And at some point in time you called her
11 in New York to get a job?
12 A. That's right.
13 Q. And you also called Jean-Luc Bernell?
14 That's his name. Right?
15 A. Jean-Luc, yeah, I don't remember his last
16 name.
17 Q. Does that sound familiar to you, Jean-Luc
18 Bernell?
19 A. Yeah.
20 Q. What did Eva and/or Jean-Luc say about
21 employing you?
22 A. No, they said they're going to find out
23 and obviously the first thing they did was talk to
24 Mrs. Maxwell.
25 Q. She made a telephone call to you and what

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1 precisely did she say?
2 A. She said I forbid you that you're going
3 to be -- that I will be sorry if I contact any of
4 her friends again.
5 Q. Okay. Other than you will be sorry if
6 you contact any of my friends again did she say
7 anything else about what you know about Mr.
8 Epstein and/or what goes on at his house?
9 A. She said something like don't open your
10 mouth or something like that. But you have to
11 understand, I'm a civil humble, I came as an
12 immigrant to service people, and right now you
13 feel a little -- I'm 55 and I'm afraid. First of
14 all, I don't have a job, but I'm glad this is on
15 tape because I don't want nothing to happen to me.
16 This is the way they treat you, better do this and
17 you shut up and don't talk to nobody and --
18 Q. When you say this is the way they treat,
19 who specifically are you talking about when you
20 say the word they?
21 A. Maxwell.
22 Q. And usually when you say the word they,
23 you're not only talking about one person --
24 A. Wealthy people.
25 Q. Are you also putting Jeffrey Epstein in

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1 that category?
2 MR. CRITTON: Form.
3 THE WITNESS: I didn't talk to him
4 directly most of the time.
5 BY MR. [REDACTED]:
6 Q. What's the reason why if you were his
7 head of security that you wouldn't have more
8 direct contact with him? Why is that?
9 MR. CRITTON: Form.
10 THE WITNESS: He wanted that way, you
11 know, so, yeah, I have to talk to Sarah,
12 Sarah is not available talk to Lesley in New
13 York. He didn't want to be disturbed.
14 BY MR. [REDACTED]:
15 Q. Even while you were in the same house
16 with him he still had other people you could talk
17 to directly but he was not one of them?
18 A. Yeah.
19 Q. When you were fired you were not fired
20 directly by him?
21 A. No.
22 Q. It was through somebody else?
23 A. Ms. Maxwell.
24 Q. Okay. But it was for upsetting him for
25 taking the wrong car?

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1 A. Yes.

2 Q. Okay. Ever since this communication that

3 Ms. Maxwell made to you where she called you

4 sometime in May or June of 2005, and have you felt

5 threatened?

6 A. Yes.

7 MR. CRITTON: Form.

8 BY MR. [REDACTED]:

9 Q. Have you felt reluctant to come forward

10 and give truthful, honest, and full disclosure of

11 all information that you know about this case?

12 MR. CRITTON: Form.

13 THE WITNESS: I said this off the record

14 but I will say it on the record, being in

15 the Epstein case for me resulted in two

16 years I have -- I won't bring the names but

17 I was in the third interview to get hired as

18 a household manager in Palm Beach and they

19 told me you are the Jeffrey Epstein guy.

20 Not in the sense I did something wrong

21 because of the scandal, so they shun the job

22 away from me. And so I was afraid that --

23 this is very powerful people and one phone

24 call and you finish, so I'm the little guy.

25 Even I'm wearing a tie I'm a -- I'm talking

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1 from my heart. This is the way it is.

2 BY MR. [REDACTED]:

3 Q. I feel for you, I'm sorry that you have

4 to be in this position.

5 MR. CRITTON: Move to strike this.

6 BY MR. [REDACTED]:

7 Q. Well, when you applied for these jobs and

8 they turned you down and gave you the reason that

9 you're the person involved in the Jeffrey Epstein

10 scandal, was it that they are associated or

11 friends with Jeffrey Epstein or is it that you

12 have information and you have this confidentiality

13 but you're revealing some certain information that

14 Mr. Epstein would not like?

15 MR. CRITTON: Form.

16 THE WITNESS: Both.

17 BY MR. [REDACTED]:

18 Q. Both?

19 A. Both.

20 Q. And since then given what you just told

21 us about these people being very powerful, are you

22 afraid for your life given the fact that you're

23 involved to some extent in this case?

24 MR. CRITTON: Form.

25 THE WITNESS: I just start thinking about

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1 this. Because I went through -- the first

2 time I went to the deposition I was in Palm

3 Beach and I did my duty, I mean, I tell what

4 I know, but now I know there is more

5 digging, all I want is this to be to get on

6 with my normal life and stuff.

7 BY MR. [REDACTED]:

8 Q. So when you come here today to testify,

9 your main objective is to get back to your normal

10 life and get out of the spotlight of this case.

11 Yes?

12 A. Yes.

13 Q. And in doing so have you held back some

14 of the details that you know about that happened

15 in this case to remove yourself from the

16 spotlight?

17 MR. CRITTON: Form.

18 THE WITNESS: No, sir.

19 BY MR. [REDACTED]:

20 Q. Okay. Have you ever talked to Ghislaine

21 Maxwell after that telephone call where she called

22 you and you felt threatened?

23 A. No.

24 Q. Okay. So going back to where we started

25 here was, does Ghislaine Maxwell have knowledge of

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1 the girls that would come over to Jeffrey

2 Epstein's house that are in roughly the same age

3 group as C. and T. and to have a good time as you

4 put it?

5 MR. CRITTON: Form.

6 THE WITNESS: Yes.

7 BY MR. [REDACTED]:

8 Q. And what was her involvement and/or

9 knowledge about that?

10 MR. CRITTON: Form.

11 THE WITNESS: She knew what was going on.

12 BY MR. [REDACTED]:

13 Q. You referred to her at one point in time

14 as Jeffrey Epstein's companion. But then later on

15 you said that if she flew she flew on a different

16 airplane and oftentimes or sometimes she slept in

17 a different bed from Mr. Epstein. Did that seem

18 unusual to you?

19 MR. CRITTON: Form.

20 THE WITNESS: It was odd but, I mean, and

21 again, everything is odd in Palm Beach.

22 BY MR. [REDACTED]:

23 Q. Okay, I don't mean to laugh.

24 A. Mr. Epstein fly to Jet Aviation, she fly

25 to Galaxy Aviation, but they never flew the same

45 (Pages 174 to 177)

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1 that tape it's going to be Assistant Attorney
 2 Weiss and Detective Recarey asking questions?
 3 A. Yes.
 4 Q. It says, during the sworn taped statement
 5 Mr. Rodriguez stated he was employed by Jeffrey
 6 Epstein for approximately six months.
 7 I think we already talked about that.
 8 I'm skipping ahead a little bit.
 9 If Rodriguez needed to relay a message to
 10 Epstein he would have to notify Epstein's
 11 secretary Lesley in New York who would then notify
 12 Epstein's personal assistant Sarah who would relay
 13 the message to Epstein.
 14 A. Yeah.
 15 MR. CRITTON: Form.
 16 BY MR. [REDACTED]:
 17 Q. That's pretty much the process you
 18 described?
 19 A. Yes, it was normal procedure.
 20 Q. Rodriguez stated Epstein did not want to
 21 see or hear the staff when he was in the
 22 residence?
 23 MR. CRITTON: Form.
 24 THE WITNESS: That's correct.
 25 BY MR. [REDACTED]:

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1 Q. That's something you agree with?
 2 A. Yes.
 3 MR. CRITTON: Form.
 4 BY MR. [REDACTED]:
 5 Q. Rodriguez advised Mr. Epstein had many
 6 guests.
 7 In addition to the girls who are roughly
 8 C. and T. age who had come to the house to have a
 9 good time, who were some of the other guests that
 10 you know of, if you know their name?
 11 MR. CRITTON: Form.
 12 THE WITNESS: I mentioned Alan
 13 Dershowitz.
 14 BY MR. [REDACTED]:
 15 Q. That's a lawyer from Harvard?
 16 A. Yes. The magician, David Copperfield,
 17 some other lawyers from New York, you know. There
 18 were some other guests.
 19 Q. And how frequently would these other
 20 guests come over?
 21 A. Once a month, something like that.
 22 Q. Okay. So if it's only once a month and
 23 you were only there six months you're saying you
 24 only saw six guests come over in addition to --
 25 A. They have people, you know, they have

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1 friends, I will say, yeah.
 2 Q. Then you mentioned that you typed into
 3 Google, I guess you Googled Prince Andrew and Bill
 4 Clinton. Why would you pick those names, were
 5 they associated with Mr. Epstein?
 6 A. Yes.
 7 Q. And what is your understanding as to how
 8 Prince Andrew is associated with Jeffrey Epstein?
 9 A. Because there were pictures with him
 10 together.
 11 Q. In the house?
 12 A. Yes.
 13 Q. Many pictures or are we talking about
 14 one?
 15 A. Many pictures.
 16 Q. Were these pictures that looked that
 17 appeared to be at social events, at Mr. Epstein's
 18 house or where?
 19 A. Mrs. Maxwell took him to England to
 20 introduce him to the royalty.
 21 Q. Is it's your understanding that Ghislaine
 22 Maxwell knew Prince Andrew and introduced --
 23 A. Yes.
 24 Q. Is it also your understanding that at
 25 some point in time Ghislaine dated or had a

Page 201

1 romantic relationship with Prince Andrew?
 2 MR. CRITTON: Form.
 3 THE WITNESS: I don't know that.
 4 BY MR. [REDACTED]:
 5 Q. Do you know around what time period it
 6 was that Mr. Epstein was introduced to Prince
 7 Andrew?
 8 A. 2003, I believe.
 9 Q. How do you know that?
 10 A. I've heard dates.
 11 Q. From people in the Epstein group?
 12 A. Yes.
 13 Q. Okay.
 14 MR. CRITTON: Let me note my objection,
 15 move to strike, it's based on -- his
 16 testimony is based on hearsay.
 17 BY MR. [REDACTED]:
 18 Q. During the six month period of time when
 19 you worked directly for Mr. Epstein, how often did
 20 Mr. Epstein get together with or hangout with
 21 Prince Andrew; if you know?
 22 A. I didn't see him once.
 23 Q. You never saw Prince Andrew at the house?
 24 A. No, no, he called.
 25 Q. I'm sorry, how often would he call?

51 (Pages 198 to 201)

Page 202

1 A. I will say once a week we used to get a
 2 call from him.
 3 Q. Did you ever hear or did you ever know of
 4 Prince Andrew being involved with any of the same
 5 girls that Jeffrey Epstein was involved?
 6 A. No.
 7 Q. All right. Same question with Bill
 8 Clinton, were you ever aware of him being involved
 9 with any girls?
 10 A. No.
 11 Q. And David Copperfield?
 12 A. No.
 13 Q. What would he do when he was in town?
 14 A. He came to the house, played tricks and
 15 he leave.
 16 Q. Did you watch?
 17 A. Yeah. Cards and --
 18 Q. That's nice, you get an up close and
 19 personal show from David Copperfield.
 20 How often would David Copperfield and
 21 Jeffrey Epstein talk?
 22 A. When I was there he was maybe two or
 23 three times in the house.
 24 Q. Besides those guests have you pretty much
 25 listed the guests that you were aware of?

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1 A. Mr. Dershowitz was there, I took him two
 2 or three times to the airport. And like I say,
 3 lawyers from New York, business matters.
 4 Q. Okay. And Donald Trump, did you ever see
 5 him at the house?
 6 A. No, he used to call.
 7 Q. Is it your understanding that -- or
 8 through your knowledge do you know if Donald Trump
 9 owned or runs the Mara Lago Club?
 10 A. Yes.
 11 Q. Did Mr. Epstein go to the Mara Lago Club?
 12 A. No.
 13 Q. Why not?
 14 MR. CRITTON: Form.
 15 THE WITNESS: He's a very private person.
 16 BY MR. [REDACTED]:
 17 Q. So it's your understanding that Mr.
 18 Epstein didn't go to the Mara Lago Club just
 19 because he's private?
 20 MR. CRITTON: Form.
 21 THE WITNESS: Yes.
 22 BY MR. [REDACTED]:
 23 Q. Are you aware, has he ever been there?
 24 A. That I don't know.
 25 Q. Do you know if he's a member?

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1 A. Probably is.
 2 MR. CRITTON: Form, move to strike, it's
 3 a guess, speculation.
 4 BY MR. [REDACTED]:
 5 Q. When you say he probably is, what are you
 6 basing that on?
 7 A. Because he belongs to all the clubs in
 8 Palm Beach.
 9 Q. Okay. But you don't have a list of all
 10 of the clubs that he belongs to?
 11 A. I used to.
 12 Q. And on that list --
 13 A. I don't remember, you know.
 14 Q. Okay. Do you know where that list is?
 15 A. Probably it's in the house.
 16 Q. Skipping down on page 71 of the report to
 17 the third paragraph, Rodriguez stated once the
 18 masseuses would arrive, he would allow them entry
 19 into the kitchen area and offer them something to
 20 eat or drink. Do you agree with that?
 21 A. Yes.
 22 MR. CRITTON: Form.
 23 BY MR. [REDACTED]:
 24 Q. They would then be encountered by Sarah
 25 or Epstein.

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1 MR. CRITTON: Form.
 2 THE WITNESS: (Shakes head.)
 3 BY MR. [REDACTED]:
 4 Q. Yes?
 5 A. (Shakes head.)
 6 Q. They would then be taken upstairs to
 7 provide a massage. Right?
 8 MR. CRITTON: Form.
 9 THE WITNESS: Yes.
 10 BY MR. [REDACTED]:
 11 Q. Again, you don't know what happened
 12 behind closed doors?
 13 A. No.
 14 Q. But you were told to refer to these girls
 15 as masseuses?
 16 A. Yes.
 17 Q. Aside from being told that, you have
 18 absolutely no idea what went on up there?
 19 A. No.
 20 Q. All right. I asked Rodriguez any of the
 21 masseuses appeared to be young in age, he advised
 22 he didn't ask their ages but felt they were very
 23 young.
 24 A. Early 20's, you know. They're all very
 25 young, but I mean, it's hard to say who's underage

52 (Pages 202 to 205)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2, CASE NO: 08-CV-80119
Plaintiff,
Vs.
JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 3, CASE NO: 08-CV-80232
Plaintiff,

Vs.

JEFFREY EPSTEIN,
Defendant.

CONDENSED

JANE DOE NO. 4, CASE NO: 08-CV-80380
Plaintiff,

Vs.

JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 5, CASE NO: 08-CV-80381
Plaintiff,

Vs

JEFFREY EPSTEIN,
Defendant.

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1 JANE DOE NO. 6, CASE NO: 08-CV-80994
 2 Plaintiff,
 3 Vs.
 4 JEFFREY EPSTEIN,
 5 Defendant.
 6
 7 JANE DOE NO. 7, CASE NO: 08-CV-80993
 8 Plaintiff,
 9 Vs.
 10 JEFFREY EPSTEIN,
 11 Defendant.
 12 C.M.A., CASE NO: 08-CV-80811
 13 Plaintiff,
 14 Vs.
 15 JEFFREY EPSTEIN,
 16 Defendant.
 17
 18 JANE DOE, CASE NO: 08-CV-80893
 19 Plaintiff,
 20 Vs.
 21 JEFFREY EPSTEIN,
 22 Defendant.
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1 IN THE CIRCUIT COURT OF THE 15TH
 2 JUDICIAL CIRCUIT IN AND FOR
 3 PALM BEACH COUNTY, FLORIDA
 4 CASE NO. 502008CA037319XXXXMB AB
 5 B.B.,
 6 Plaintiff,
 7 Vs.
 8 JEFFREY EPSTEIN.
 9 Defendant.
 10
 11 1031 Ives Dairy Road
 12 Suite 228
 13 North Miami, Florida
 14 August 7, 2009
 15 1:15 p.m. to 5:30 p.m.
 16
 17 CONTINUED
 18 VIDEOTAPED
 19 DEPOSITION
 20 of
 21 ALFREDO RODRIGUEZ
 22 taken on behalf of the Plaintiffs pursuant
 23 to a Re-Notice of Taking Continued Videotaped
 24 Deposition (Duces Tecum)
 25 - - -

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1 JANE DOE NO. II, CASE NO: 08-CV-80469
 2 Plaintiff,
 3 Vs.
 4 JEFFREY EPSTEIN,
 5 Defendant.
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 7 JANE DOE NO. 101 CASE NO: 08-CV-80591
 8 Plaintiff,
 9 Vs.
 10 JEFFREY EPSTEIN,
 11 Defendant.
 12 JANE DOE NO. 102, CASE NO: 08-CV-80656
 13 Plaintiff,
 14 Vs.
 15 JEFFREY EPSTEIN,
 16 Defendant.
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2 (Pages 271 to 274)

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1 MR. CRITTON: Form.
 2 THE WITNESS: Yes, [REDACTED]
 3 BY MS. EZELL:
 4 Q. And were there some who maybe came just
 5 once or twice with other young women?
 6 A. That's correct, [REDACTED]
 7 Q. Now, where would the young woman who was
 8 bringing another young woman go during the time
 9 the person that she brought was upstairs giving
 10 the massage?
 11 MR. CRITTON: Form.
 12 THE WITNESS: I will take them to the
 13 kitchen and Sarah would take them from
 14 there.
 15 BY MS. EZELL:
 16 Q. Do you know where she took them?
 17 A. No, [REDACTED]
 18 Q. Were they ever taken to just sit in the
 19 living room and wait?
 20 MR. CRITTON: Form.
 21 THE WITNESS: I don't know, [REDACTED]
 22 BY MS. EZELL:
 23 Q. These pictures of nude young women taken
 24 in gatherings where they were smiling, did they
 25 appear to you to be taking part in an orgy?

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1 MR. CRITTON: Form.
 2 THE WITNESS: I don't know, [REDACTED]
 3 BY MS. EZELL:
 4 Q. Do you know the word cavorting?
 5 A. No, [REDACTED] I don't know.
 6 Q. I need my Thesaurus. You said they were
 7 smiling, did they appear to be having a good time?
 8 A. Yes, [REDACTED]
 9 Q. Did they appear to be doing anything
 10 sexual?
 11 A. Yes, [REDACTED]
 12 Q. And in these instances were there girls
 13 doing sexual things with other girls?
 14 A. Yes, [REDACTED]
 15 Q. And I'm still talking about the pictures
 16 on Ms. Maxwell's computer.
 17 A. Yes, [REDACTED]
 18 MR. CRITTON: You're talking about the
 19 group shots that he's mentioned from Russia
 20 and Eastern Europe?
 21 MS. EZELL: And girls in the shower.
 22 MR. CRITTON: Let me object to the form
 23 then the way you just now described that.
 24 MS. EZELL: He said for instance.
 25 MR. CRITTON: He had said a girl in the

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1 shower, I don't know whether he ever used
 2 plural.
 3 BY MS. EZELL:
 4 Q. Was there more than one picture of a girl
 5 in the shower?
 6 A. There were two girls in the shower.
 7 Q. Two girls in the shower together?
 8 A. Yes, [REDACTED]
 9 Q. And were those two girls engaged in
 10 something sexual?
 11 A. Yes, [REDACTED]
 12 Q. And I may have asked you this question,
 13 forgive me if I did, did you know those two girls?
 14 A. No, [REDACTED]
 15 Q. Did Ms. Maxwell have nude pictures of
 16 Nadia on her computer?
 17 MR. CRITTON: Form.
 18 THE WITNESS: I don't know, [REDACTED]
 19 BY MS. EZELL:
 20 Q. Did you ever meet a young woman named
 21 Emmy who had an association with Ms. Maxwell?
 22 MR. CRITTON: Emmy?
 23 MS. EZELL: Emmy.
 24 THE WITNESS: I don't remember, [REDACTED]
 25 BY MS. EZELL:

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1 Q. Did you ever have any conversations with
 2 Ms. Maxwell about any of the women in those
 3 pictures?
 4 A. No, [REDACTED]
 5 Q. And did you ever have a conversation with
 6 [REDACTED] about any of the pictures of the
 7 girls in her computer?
 8 A. No, [REDACTED]
 9 Q. You were asked last time about the creams
 10 and lotions that Mr. Epstein typically had
 11 available to him and you said you thought there
 12 was a favorite one but you couldn't remember it.
 13 A. Spa.
 14 Q. Spa, you did say Spa.
 15 A. Yeah.
 16 Q. Thank you.
 17 Where did the stairway from the kitchen
 18 lead -- to where did it lead?
 19 A. To the second floor between the first and
 20 second bedrooms.
 21 Q. Were either of those bedrooms the [REDACTED]
 22 bedroom?
 23 A. No, [REDACTED]
 24 Q. Could one go up that staircase through --
 25 could one go up that staircase and reach the

12 (Pages 311 to 314)