

EXHIBIT 7

PART 1

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRAS [REDACTED]

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF JUAN ALESSI
VOLUME I

Tuesday, September 8, 2009
10:12 a.m. - 3:45 p.m.

2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33401

Reported By:

Sandra W. Townsend, FPR

Notary Public, State of Florida

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West Palm Beach Office

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EXHIBITS

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PROCEEDINGS

Deposition taken before Sandra W. Townsend, Court Reporter and Notary Public in and for the State of Florida at Large, in the above cause.

VIDEOGRAPHER: Today is September 8, 2009. The time is 12 minutes after 10:00 in the morning.

This is the videotaped deposition of Juan Alessi in the matter of Jane Doe number two versus Jeffrey Epstein. This deposition is being held at 2139 Palm Beach Lakes Boulevard in West Palm Beach, Florida.

My name is Stan Sanders. I'm the videographer representing Visual Evidence, Incorporated.

Would the attorneys please announce their appearances for the record.

MR. WILLITS: Richard Willits, representing [REDACTED].

MR. BERGER: William J. Berger, representing E.W., L.M. and Jane Doe number two.

MR. MERMELSTEIN: Stuart Mermelstein of Mermelstein and Horowitz, representing Jane Does numbers two through eight.

MR. LANGINO: Adam Langino, on behalf of B.B.

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MS. EZELL: Katherine Ezell from Podhurst Orseck, on behalf of Jane Does 101 and 102.

MR. CRITTON: Bob Critton, on behalf of Jeffrey Epstein.

THEREUPON,

JUAN ALESSI, having been first duly sworn or affirmed, was examined and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MR. WILLITS:

Q. Good morning, sir.

A. Good morning.

Q. I introduced myself through the videographer.

My name is Richard Willits.

A. Okay.

Q. I represent a young lady by the name of [REDACTED].

A. Okay.

Q. Is that name familiar to you at all?

A. Whose name?

Q. [REDACTED]. Do you recognize that name?

A. No.

Q. What is your residence address, sir?

A. My address is 6791 Fairway Lakes Drive,

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Boynton Beach, Florida, 33472.

Q. All right, sir. Did you ever work for Jeffrey Epstein?

A. Yes, I did.

Q. In what capacity?

A. Everything. I started with Jeffrey Epstein around 19 -- please bear with the dates because I'm trying --

Q. Sure.

A. -- to remember. 1969 as a part-time maintenance guy.

And then I became a full-time employee, I think it was January 1, 2 -- '91, '92, so '92. Sorry.

Q. You said you started in 1969? That would be --

A. No. No. No. No. No.

Q. Okay.

A. '99.

Q. 1999?

A. Yeah.

Q. All right. And how did you happen to get that job? Was it through an employment agency --

A. No.

Q. -- or an ad in the paper?

A. I had a company at that time used to take care

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of a lot of residents in Palm Beach. And I got to know Jeffrey through Lesley Wexner. And I used to work in about 20 different, 20, 25 different homes in Palm Beach as a maintenance guy.

Q. Okay.

A. And I have basically my own company and I do repairs for them. I did home sit in for them.

Q. And what was -- did you work for Jeffrey Epstein? What was your position when you started?

A. When I started, he hire me to -- he just bought the house.

Q. I'm sorry?

A. He just had bought the house --

Q. Okay.

A. -- where he live on El Brillo. And he hire me through Mr. Wexner's references to do repair works. And basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it, --

Q. I see.

A. -- fix it.

Q. And when you started working for Mr. Epstein, were you still working for other people in Palm Beach?

A. Yes, I did.

Q. Okay. And about how long a period of time did you do this type of work for Mr. Epstein, the

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1 maintenance and taking out walls?

2 A. It was couple months. It was couple months
3 before.

4 Q. And what was the name of your company?

5 A. Alessi Maintenance.

6 Q. And how were you paid?

7 A. By him?

8 Q. Yes.

9 A. Usually by check or cash sometimes.

10 Q. Do you know what company actually paid your
11 company?

12 A. It was Jeffrey Epstein and Company.

13 Q. So you said you had that position for a couple
14 of months.

15 What happened next?

16 A. Then Mr. Epstein asked me to, if I wanted to
17 be his employee, because I was going from one house to
18 another house to another house, one hour here. I was
19 just running around Palm Beach all day.

20 So he asked me if I would just work for him,
21 exclusively for him.

22 Q. Okay.

23 A. And we agreed with the terms and I become a
24 full-time employee as a maintenance guy. And I was
25 taking care of everything, as far as maintenance.

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1 Then my job changed little by little to house
2 man, estate manager, and then to a majordomo.

3 Q. Okay. When you first agreed to terms with
4 Mr. Epstein and you first started working for him full
5 time, what were those terms, do you remember?

6 A. The terms is basically was how much -- he
7 asked me how much I was making in all the properties.

8 And I says, well, I make this -- this amount
9 of money.

10 And he says, fine.

11 Q. And how much was that, did he pay you?

12 A. Around \$45,000. I think I started with 45.

13 Q. Okay. And when you started to work for him as
14 a full-time employee, did you have anybody that you
15 reported to or did you deal directly with Mr. Epstein?

16 A. At the beginning with Mr. Epstein, directly to
17 him.

18 Q. Did that change?

19 A. Later on, yes.

20 Q. And how did that change?

21 A. When Ms. Maxwell, Ghislaine Maxwell came to
22 the picture.

23 Q. Okay. About when was it that she came into
24 the picture?

25 A. Exactly date, I cannot remember. But it was

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1 about seven months before -- after I become a full-time
2 employee.

3 Q. Okay. And how did Ms. Maxwell come into the
4 picture?

5 A. It was his girlfriend, his main girlfriend.

6 Q. Okay. Had you known her before she became --

7 A. No.

8 Q. -- your --

9 A. Never know her before.

10 Q. I'm sorry. I didn't get a chance to finish my
11 question.

12 Would you have referred to her as your
13 supervisor or your superior or what would you have
14 called Mrs. Maxwell?

15 A. I used to call her Ghislaine.

16 Q. Okay. And how was it explained to you that
17 you were now to deal with Ms. Maxwell, as opposed to
18 Jeffrey Epstein?

19 A. She would tell me, I am going to take care of
20 the house.

21 Q. Okay. That was explained to you by
22 Ms. Maxwell?

23 A. Uh-huh.

24 Q. Is that a yes?

25 A. Yes.

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1 Q. And when Ms. Maxwell started assuming
2 responsibility for the house, did your duties change at
3 that time?

4 A. Not much.

5 Q. Okay.

6 A. Not much.

7 Q. And at that time when Ms. Maxwell started
8 taking responsibility for the house, what were your
9 duties?

10 A. Basically I was still doing the maintenance
11 work.

12 Q. Okay.

13 A. Was doing -- they were trying to remodel the
14 home and they would told me, okay, tear down this wall.
15 We want to see how it's going to look. Or put this
16 windows and tear down -- we had a fishing tank. We took
17 it out -- I took it out. A kitchen on the second floor.
18 I took it out. So it was basically dismantling the
19 house.

20 Q. Okay. And about how long a period of time did
21 that project last?

22 A. I would says, six to seven months.

23 Q. Okay. And after the remodeling slacked off or
24 stopped, did your duties then change?

25 A. Yeah. Increasingly they change.

3 (Pages 9 to 12)

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1 Q. Okay. Who --

2 A. Periodically. It didn't change from one day
3 to another.

4 Q. And who would tell you that your duties were
5 increasing?

6 A. Either Mr. Epstein or Ms. Maxwell.

7 Q. Okay. And how did your duties increase?

8 A. In -- I become more -- more involved in the
9 daily running operation of this home. This home was run
10 like a hotel basically.

11 Q. Okay. Were you given any manuals or rules or
12 procedures that you had to follow?

13 A. At the end of my stay, yes, I was.

14 Q. Okay. At the end. And I'm going to jump to
15 the end now and then come back.

16 What was it that you were given at the end of
17 your stay; what kind of papers or manuals?

18 A. It was a manual. I can't remember how many
19 pages, but it was quite thick manual that was -- that
20 was done by estate manager, that she will manage all --
21 all the properties. And that was also to be in force in
22 Palm Beach.

23 Q. I see. Do you still have a copy of that
24 manual?

25 A. No, I don't.

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1 Q. Do you have any papers whatsoever that were
2 prepared while you were working --

3 A. No.

4 Q. -- for Mr. Epstein?

5 A. I left everything in there.

6 Q. Did you make any diary notes yourself or any
7 notes for your own private use while you worked for
8 Mr. Epstein?

9 A. No, sir. The only thing I have is my
10 separation agreement. That's it.

11 Q. Okay. Did you bring that with you today?

12 A. No, I didn't.

13 Q. Okay. Did your duties ever include taking
14 telephone messages?

15 A. Yes, sometimes.

16 Q. And when did that start approximately?

17 A. When I move from the outside to the inside of
18 the house.

19 Q. All right.

20 A. I -- when I start the position, I never had an
21 apartment in the house. And when I definite they want
22 me inside to run the house, I had an apartment. I have
23 a small service quarters in the house, inside the house.

24 Q. Okay. And when you say, outside the house, do
25 you mean outside the property or were you -- or were you

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1 living on the property, but outside the house?

2 A. I was living in the property. No. No. No.
3 I was working outside the property.

4 Q. Yes.

5 A. And because it was multiple jobs that I had to
6 do.

7 Q. Okay.

8 A. Had to do with the pool, the service, the
9 landscaping, taking care of that. I didn't do it
10 myself, but I have people working for me.

11 Q. Okay. Approximately when was it in
12 relationship to Ms. Maxwell taking over the
13 responsibility of the house did you then move inside the
14 house?

15 A. I will says, after it was done, a big
16 renovation, when architects and engineers. And that was
17 after I did the breaking down of this renovation, they
18 hire architects, they hire decorators and engineers, and
19 did the -- they did the work. It was a big renovation,
20 one of the renovations.

21 And then they make our quarters. They even
22 built our -- my quarters in there.

23 Q. When you said "our," was there someone else
24 who had quarters there, too?

25 A. About three years later, after I start

Page 16

1 working, my wife came to help me.

2 Q. I see. And are you able to describe for me
3 where the quarters were, like, what floor?

4 A. Yes. It was in the second floor and the --
5 let me trying to remember -- northeast corner of the
6 property. Northeast corner, yes.

7 Q. Did anyone else work for Mr. Epstein while you
8 were working for him there at the house?

9 A. During the whole time?

10 Q. Yes, sir.

11 A. Yes.

12 Q. All right. When you first started there,
13 there was no one else?

14 A. When I started there, was a -- it was a
15 Jamaican girl that she was doing the cooking.

16 Q. Okay. Do you happen to remember her name?

17 A. No.

18 Q. All right.

19 A. She worked for couple months.

20 Q. I see. All right. When did any other
21 employees begin to work for Mr. Epstein while you were
22 there?

23 A. They hire chefs. There was mostly European
24 chefs. It was an English chef, but I cannot -- Rupert.
25 I know his name was Rupert. A [REDACTED] chef that was

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1 Didier. A kid from New York who was a chef, also. But
2 they were one after another one. They were hiring chefs
3 when I doing -- sometimes I did most of the cooking.
4 When they wanted to bring their chef, they bring their
5 chef in their plane. And the chef will stay, will work
6 there and then will travel with them.

7 Q. Were there any other employees that worked for
8 Mr. Epstein while you were worked for him, that you know
9 of?

10 A. No, except my wife.

11 Q. Did you know a lady by the name of Sarah
12 [REDACTED]?

13 A. Sarah, yes, I do. [REDACTED] came at the
14 end of my stay there, probably two or three months
15 before I left.

16 Q. Okay. Did she do any work for Mr. Epstein,
17 that you know of?

18 A. Yes. She was a -- I don't know her deterrent,
19 but she was an assistant to him or to her. I don't
20 know.

21 Q. All right. There is a -- I've seen a
22 reference in -- and the spelling has changed in my
23 various references -- is there a N. or N.? Do you
24 recognize that name?

25 A. N.

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1 Q. N.

2 A. N. Yes, I know N.B.

3 Q. Want to take a chance at spelling that last
4 name?

5 A. I think it was B. But she was not an
6 employee. She was a guest.

7 Q. Was she a full-time guest?

8 A. No.

9 Q. When would she visit?

10 A. She was a girl that was very, very talented.
11 Mr. Epstein help her become an actress. Now she's a
12 movie actress and she's in a soap opera. She came with
13 her mother to the house. And she -- he help her come up
14 with her career.

15 Q. Okay. Do you -- are you familiar with any
16 other individuals by the name of N. or N. who worked for
17 Mr. Epstein?

18 A. No.

19 Q. After the renovations were complete, did you
20 have access to the entire house while you worked for
21 Mr. Epstein?

22 A. Absolutely, yeah.

23 Q. Was there any particular portion of the house
24 that was denied access by -- to you?

25 A. No.

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1 Q. Were there any photographs of nude females in
2 the house while you were there?

3 MR. CRITTON: Form.

4 MR. WILLITS: What's the matter with that
5 form?

6 MR. CRITTON: Overly broad. Nude? You mean,
7 completely naked?

8 MR. WILLITS: However you want to interpret
9 it.

10 THE WITNESS: Excuse me. Can you repeat that
11 again?

12 MR. CRITTON: Form.

13 BY MR. WILLITS:

14 Q. Yes. Were there any photographs of nude
15 females in the house while you worked for Mr. Epstein?

16 A. Yes. Sometimes I saw nude photographs.

17 Q. Are you able to describe where you saw those,
18 where in the house?

19 A. Most of the times those photographs were taken
20 by Ms. Maxwell. And they usually are her desk. And she
21 kept a big album.

22 Q. Do you remember any pictures of nude or
23 partially unclothed females on the walls at
24 Mr. Epstein's house?

25 MR. CRITTON: Form.

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1 BY MR. WILLITS:

2 Q. He's just making objections for the record
3 that he can take -- he will take it up with the Judge
4 later on.

5 A. Okay.

6 Q. You don't need to worry about --

7 A. Yes, it was. It was pictures of partially
8 nude.

9 Q. And where were they?

10 A. Most of the times they were in the pool.

11 Q. How about on the stairway?

12 A. No. On the stairway there were no pictures
13 when I was there.

14 Q. How many stairways were there?

15 A. It was the service stairway that is very
16 narrow coming from the service quarters to the kitchen.
17 And the main stairway, that it was quite wide
18 and to the second floor.

19 Just those two.

20 And also there was a stairway outside through
21 the pool to the balcony upstairs.

22 Q. And do you have a recollection of pictures of
23 any females whatsoever on either of the inside
24 stairways?

25 A. No, I don't.

5 (Pages 17 to 20)

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1 Q. What is your understanding, sir, of the -- a
2 reference to a girl, as opposed to a woman? Are you
3 familiar with the term, girl?

4 A. Of course.

5 Q. Are you familiar with the term, woman?

6 A. I interpret most a woman, a married woman, a
7 married person.

8 Q. Are you -- how would you describe a 14 year
9 old, a woman or a girl?

10 A. A girl, of course.

11 Q. How would you describe a 16 year old, a woman
12 or a girl?

13 A. Again, I don't know. I am not -- I don't
14 think I can tell you exactly she is 14 or 16.

15 Q. But if you knew --

16 A. Sixteen, I would think is a girl, of course.

17 Q. Were there ever any visitors to the Epstein
18 house that you considered to be girls, as opposed to
19 women?

20 A. Yes. Yes. I think I would says, I never
21 check her i.d.

22 Q. Right.

23 A. Or I was not told to check i.d.s. --

24 Q. Of course.

25 A. -- on these girls. But one, I would says,

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1 N.B. was very young because she was in high school. And
2 sometimes either I pick her mother and herself from her
3 house or I pick her from The School of the Arts or the
4 ballet place, ballet in West Palm Beach. I can't
5 remember exactly what that place is, the name of the
6 place.

7 Q. Did you give -- provide transportation for any
8 other females while you worked for Mr. Epstein?

9 A. Occasionally, yes, I did.

10 Q. Do you happen to remember the names of any of
11 those females?

12 A. I remember one, specifically one. It was V.
13 Her name was V. I can't remember her last name, but I
14 think it was P. I'm not sure. I can be wrong on that.

15 Q. And how many times did you provide
16 transportation services for this female?

17 A. Whenever I had -- I been told. Whenever I was
18 told to go get them or bring them back to their house.

19 Q. Did you consider V. to be a girl or a woman?

20 A. Again, I think it was a woman, from myself,
21 her dressing and her -- I think it was -- again, I don't
22 know if she was 16, 17 or 18 or 19, could have been.
23 But she was not -- I never pick her up from a school or
24 anything like that. The only girl that I picked up from
25 the school was N.

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1 Q. Okay. Do you remember any other females being
2 present at the house, other than the females that you've
3 mentioned, which were N., her mother, [REDACTED], V.

4 Were there any others that you --

5 A. Many, many, many, many, many.

6 Q. When did you first --

7 MR. CRITTON: Can I just have the last
8 question read back?

9 MR. WILLITS: Of course you can.

10 MR. CRITTON: Please.

11 MR. WILLITS: But only once.

12 MR. CRITTON: That's all I need.

13 MR. WILLITS: You sure.

14 Go ahead.

15 (Previous question was read.)

16 MR. CRITTON: And can I just ask for a
17 clarification from you? Are you going to use -- if
18 you use the word woman, are you --

19 MR. WILLITS: I said, females.

20 MR. CRITTON: No, no, I understand. But in
21 the future if you use woman, does that mean, at
22 least to Mr. Alessi, that that's married, and if
23 it's a girl she has to be 14 or 16? Because that's
24 how you asked the question.

25 MR. WILLITS: All I'm going to talk about is

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1 females.

2 MR. CRITTON: Okay.

3 MR. WILLITS: And ask --

4 MR. CRITTON: I'll be alert to the questions
5 then.

6 MR. WILLITS: All right. So you don't need to
7 sleep through the next few questions.

8 MR. CRITTON: I don't sleep at all.

9 MR. WILLITS: All right. Now I'm totally
10 confused.

11 BY MR. WILLITS:

12 Q. When did you first become aware of females
13 visiting the Epstein house?

14 A. Since I know him.

15 Q. During the renovations?

16 A. Yeah.

17 Q. Were there --

18 A. Before the -- before Ms. Maxwell.

19 Q. Okay. All right. Let's use that as a
20 milepost.

21 Before Ms. Maxwell --

22 A. Before it was Ms. Maxwell, it was only one
23 woman that it was Mr. Epstein's girlfriend. And her
24 name was Dr. -- she was a doctor of medicine -- Eva
25 [REDACTED]. And I really liked this girl. She was very

6 (Pages 21 to 24)

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1 nice, nice person.

2 Q. Did you say [REDACTED] or Underson?

3 A. [REDACTED], A-N.

4 Q. A-N-D-E-R-S-O-N?

5 A. Yeah.

6 MR. BERGER: What was her first name?

7 THE WITNESS: Eva.

8 BY MR. WILLITS

9 Q. Before Ms. Maxwell assumed responsibilities
10 for the house, were there any other female visitors to
11 the house, except for Dr. Eva [REDACTED]?

12 A. No, not that I remember. She was one.

13 Q. All right. After Ms. Maxwell assumed
14 responsibility for the house, do you recall any female
15 visitors?

16 A. Many.

17 Q. When did that start in relationship to when
18 Ms. Maxwell assumed responsibilities?

19 A. Immediately.

20 Q. Were there visitors who came back more than
21 once?

22 A. Yes.

23 Q. And when I say, "visitors," I mean, female?

24 A. And males.

25 Q. I'm only interested in females. Mr. Critton

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1 may be interested in the males. I'm not sure.

2 Did you have any information as to where these
3 visitors came from?

4 A. They were mostly European girls.

5 Q. And when you say, "girls," do you mean 14 to
6 16, --

7 A. No.

8 Q. -- or do you mean females?

9 A. They all were, I would say, under -- over 20
10 years old.

11 Q. Okay. And it has been explained to us in
12 another deposition that sometimes females travelled with
13 Mr. Epstein.

14 A. Yes, they did.

15 Q. Are these females that you are referring to,
16 did they travel with Mr. Epstein or did they get to the
17 house in other ways?

18 MR. CRITTON: Form.

19 THE WITNESS: Both.

20 BY MR. WILLITS:

21 Q. Both. Okay. Were you aware of any female
22 visitors to the Epstein house from the local area of
23 Palm Beach County?

24 A. Yes.

25 Q. How -- and why did you become aware of that?

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1 A. Because they were local. Some people, they
2 live in Palm Beach. Some of these girls, they live in
3 Palm Beach.

4 Q. How did you know that?

5 A. They become friends.

6 Q. Okay. Do you happen to remember the names of
7 any of those friends?

8 A. I remember there were some girls that come
9 multiple times and they're usually there for dinners or
10 lunches. One was G.B., G.B.

11 Q. Okay.

12 A. I think she was a -- she used to work for
13 Stanley, [REDACTED] Stanley. My son work at that time same
14 person.

15 Q. Okay.

16 A. Try to remember names, but there were a lot of
17 visitors in the house, a lot of female visitors.

18 Q. Are you aware of female visitors to the house
19 who were there to perform massage services?

20 A. Yes.

21 Q. Do you recall the first time that you observed
22 a female come into the Epstein house for the purposes of
23 massage?

24 A. I don't recall that.

25 Q. How many different individuals came to the

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1 Epstein house for the purpose of massage, as far as you
2 understood it?

3 A. In the -- I would say, between 50 and a
4 hundred different persons.

5 Q. Do you happen to know any of those names?

6 A. I remember couple names.

7 Q. Okay.

8 A. And the last name I asked -- I going to tell
9 you there were girls that come multiple times and there
10 are girls who come one times and that was it.

11 Of the multiple time the girl -- the girls
12 come to the house -- "girls," again, mean -- I'm going
13 to refer everybody as girls.

14 Q. Okay. But you don't necessarily mean under
15 the age of 18 when you say --

16 A. None of these girls were under the age of 18.
17 Then again, I don't know. They could have been 18 or 19
18 or 20 or 25. I don't know. But they were all masseuses
19 and they came to the house.

20 One of the names that I remember was D.D.

21 Q. That's D.?

22 A. Uh-huh. D. I think it was.

23 So many. J., A., C., J.

24 There were also massage therapists from
25 Europe. They sometimes travel with him in the plane.

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1 And some just names that I cannot -- I cannot go on.

2 Q. Sure. How did you know that D. or J. were
3 there for purposes of a massage?

4 A. Because I was told to either Ms. Maxwell will
5 call, I will call or Mr. Epstein will told me, call this
6 girl at that time. Sometimes it was 1:00 in the
7 morning. Sometimes it was within the afternoon.
8 Sometimes it was after the movies. They usually go into
9 a movie every night after dinner. And sometimes were
10 girls that come at 10:00, 10:30.

11 Q. How would you know what number to call?

12 A. I had a list.

13 Q. Okay. Was this a list that you prepared or
14 was given to you?

15 A. I had a list that it was in my Roladex.

16 Q. Okay. So as part of your job there was a
17 Roladex?

18 A. Yes.

19 Q. Who put the information on the Roladex?

20 A. I think I did most of the times or I was given
21 a piece of paper, says, call this girl, put a number.
22 And I will call her. And if she was coming back, then
23 I'd put her as a regular massage therapist.

24 Q. Do you know how these females would be
25 transported to the Epstein house?

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1 A. Ninety-nine percent they -- they would drive
2 their own cars.

3 Q. And when they did not drive their own cars,
4 how --

5 A. Some, they were transported by the boyfriends
6 or the husbands and they wait outside.

7 Q. How about, are you aware of any of the females
8 being transported to the house by virtue of a taxi?

9 A. I think it was an occasional time that I have
10 to send a girl in a taxi, if I was going to be busy for
11 transporting them.

12 Q. Did you ever provide transportation to any of
13 the females who were there for purposes of massage?

14 A. Yes, I did.

15 Q. Okay. Do you remember where you went?

16 A. I remember specifically on V., --

17 Q. Okay.

18 A. -- that she used to live with her boyfriend in
19 [REDACTED] Palm Beach.

20 Q. All right.

21 A. And when she went the first time, she -- she
22 went by herself. I never had to bring her back. But
23 later I was told by Mr. Epstein to go and pick her up.
24 And she give me the -- or he give me the address and the
25 phone, so I call her and I went and pick her up from

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1 [REDACTED] Palm Beach.

2 She had -- she was living with a boyfriend and
3 another person in this apartment complex in [REDACTED] Palm
4 Beach.

5 Q. Okay. Do you happen to remember any other
6 areas of the county where you transported any of the
7 females?

8 A. I transport her -- one back to a house in
9 Jupiter.

10 Q. Okay.

11 A. That's what I can remember now.

12 Q. Did you ever speak to any of these females
13 that you have mentioned -- let's talk specifically about
14 the ones that you have named, D., J., A., C., J. --
15 about what they did there at the Epstein house?

16 A. No. They did massage therapy.

17 Q. And how did you know they were actually
18 providing massages?

19 A. Most of them, they had business card and they
20 left me business cards. And some of them asked me to
21 call them to provide them work.

22 And I says that was not my job. My job was to
23 call whoever they wanted. Either when she --
24 Ms. Maxwell want a massage, she will told me, I want a
25 massage at this time with this person.

Page 32

1 Q. Uh-huh.

2 A. Or Mr. Epstein will call me and he says, get
3 this girl at this time.

4 So it was not my job to pick and choose these
5 girls.

6 Q. Did you have anything to do with paying any of
7 these females?

8 A. Occasionally, yes, I did.

9 Q. Can you describe that?

10 A. The most -- the regular girls that came to the
11 house, sometimes they got paid once every night or every
12 day or I knew them and they would just say, just keep a
13 tab of the hours and I will pay amount at the end of the
14 week.

15 Q. And how were they paid, by cash or check?

16 A. Most of the times, I would says, 95 percent of
17 the times I was paid by check.

18 Q. I mean, the females?

19 A. The females, --

20 Q. The females were paid?

21 A. -- I would pay them by check.

22 Q. Out of what account?

23 A. I was -- I have an account that I was from the
24 bank for Jeffrey Epstein and my name was on it. I would
25 sign the checks. I will make a copy of a check. I will

8 (Pages 29 to 32)

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1 make the girl sign a paper that they receive check for
2 \$500 for five massages.

3 Q. And do you remember where that -- what bank
4 that account was with?

5 A. I think Palm Beach National Bank on Worth
6 Avenue.

7 Q. Did you ever have any occasions to make
8 deposits to that account?

9 A. Yeah.

10 Q. Where would the cash or checks come from to
11 make deposits?

12 A. Checks. There was checks, big checks for
13 Mr. Epstein.

14 Matter of fact, one time I was so scared. It
15 was a couple million dollar checks that I -- he told me
16 to go and deposit.

17 Q. You said that usually these girls were paid by
18 check. Were there occasions when the females would
19 be --

20 A. There were occasions --

21 Q. -- paid by cash?

22 A. -- where the girls says, do you have any cash,
23 John? They were asking for cash.

24 I says, let me take a look. So I check my
25 petty cash box that we have for the house for the

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1 expenses. And if I have it, I pay it. If not,
2 Mr. Epstein will pay.

3 Q. Did you ever have any concerns that any of the
4 females coming to the Epstein house for the purposes of
5 massage might be under the age of 18?

6 A. No, because I never saw younger, young, young
7 girls. And mostly that I was told they were massage
8 therapists.

9 Q. Told by who?

10 A. By Ms. Maxwell or Mr. Epstein.

11 Q. Did you ever have any dealings with Sarah
12 [REDACTED] about the females who came to provide massage
13 services?

14 A. No. [REDACTED] came about, I would says,
15 the most two months before my departure.

16 Q. Okay. Do you think that you would be able to
17 recognize any of the females if you saw them or their
18 pictures?

19 A. Pictures? Yeah, I think so.

20 Q. Did you ever have any discussions with any
21 fellow employees about the females who were coming to
22 provide massage services?

23 A. No.

24 Q. At the time that you left --

25 A. Yes, sir.

Page 35

1 Q. -- the employment of Mr. Epstein, who were the
2 other employees? You mentioned [REDACTED]. Anybody
3 else there?

4 A. The chef, but the chef also work in Europe, so
5 he was travelling with him.

6 Q. Right.

7 A. He had a room.

8 Then it was another renovation of the house in
9 the middle -- about a year and a half before my
10 departure. And there was a house built for the -- away
11 from the -- from the main house. It was a service
12 house. There was couple rooms in there with a kitchen
13 and a living room. So he will have a room in there, the
14 chefs.

15 Q. Okay. Does the name L. ring a bell?

16 A. No. Never saw her.

17 Q. Do you recognize the name Joe Joe as somebody
18 who worked for Mr. Epstein?

19 A. Joe Joe? Joe Joe, as far as I knew, it was --
20 I met him. He was the house man in New York.

21 Q. Okay.

22 A. It was him and his wife --

23 Q. All right.

24 A. -- that were the people, they handled the
25 house in New York.

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1 Q. Did you ever personally observe a massage
2 taking place in the Epstein house?

3 A. Never.

4 Q. Did you ever have occasion to clean
5 Mr. Epstein's bedroom after a massage?

6 A. Every time.

7 Q. Did anyone assist you with that?

8 A. Sometimes.

9 Q. Who would be -- who would assist you?

10 A. Depends on the day of the hour. Sometimes the
11 cleaning crew that we had, if it was the right date, the
12 right time, they will go out and clean up. But most of
13 the time I was involved. I was the one.

14 Q. Did you ever observe any vibrators in
15 Mr. Epstein's bedroom after a massage?

16 A. Yes, I did.

17 Q. How many?

18 A. Two.

19 Q. How many massage tables were there at the
20 Epstein residence while you worked there?

21 A. It was permanent massage tables or we had
22 tables for every room of the house. So it was about the
23 blue room, the red room. It was a massage table for the
24 balcony. It was on Mr. Epstein's bathroom,
25 Ms. Maxwell's bathroom. There was Ms. Maxwell's

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1 bathroom was in the same quarters, his quarters.

2 So we had quite a bit of expensive tables.

3 Q. Did you ever get a massage while you were
4 working for Mr. Epstein?

5 A. I wasn't that lucky.

6 Q. Okay. I'm sorry.

7 A. I don't want to lie. Yes, I did. By a guy.

8 It was a -- occasionally it was male massage
9 therapists there, there were called. They did massages
10 for Mr. Epstein and Ms. Maxwell.

11 And one time I had some pains in my back and I
12 was given as a gift.

13 Q. Now, there came to be an incident where you
14 were arrested that caused you to be terminated from
15 Mr. Epstein?

16 A. No.

17 Q. Were you terminated from Mr. Epstein's
18 employment?

19 A. Yes.

20 Q. Did you promise to pay him back some money?

21 A. Yes.

22 Q. Did you make all the payments?

23 A. Yes, I did.

24 Q. When was the last time you made a payment?

25 A. I made a payment immediately, the same

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1 payment, same amount.

2 Q. The full amount?

3 A. Full amount.

4 Q. Okay. It wasn't a payment plan?

5 A. No.

6 MR. WILLITS: I don't have any other
7 questions. You want to take a short break?

8 MR. CRITTON: Would you like to take a short
9 break?

10 THE WITNESS: I'm fine.

11 VIDEOGRAPHER: Off the record, 10:56.

12 (Brief recess.)

13 CROSS EXAMINATION

14 BY MS. EZELL:

15 Q. I'm Catherine Ezell. I want to ask you a few
16 questions about some things that came up during your
17 deposition, your earlier questioning in this deposition.

18 A. Okay.

19 Q. The book of policies that you mentioned that
20 was there by the time you left, I just wanted to
21 clarify, was that done by somebody in Palm Beach to be
22 used by different households in Palm Beach or was it
23 done by someone employed by Jeffrey Epstein to apply to
24 all the homes he --

25 A. Yes.

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1 Q. The latter?

2 A. The latter.

3 Q. What, if anything, can you remember or tell us
4 about your separation agreement?

5 A. It was basically an agreement between him and
6 myself that we will leave after all those years of
7 service.

8 And I regret to agree with the amount, but it
9 was \$30,000 for me and \$20,000 for my wife.

10 And it was -- he give my wife the car that she
11 usually drive. It was a minivan, Chrysler minivan, as
12 part of the -- as part of the separation. She loved
13 that car and she did all the shopping, it was done in
14 that car.

15 So Mr. Epstein was kind enough to give her the
16 car.

17 The rest of the stuff is, was mainly lawyer
18 stuff that you can't understand. But basically that was
19 it. And that it was a part that I think I can -- I
20 would says, it was more or less that I will not sue him
21 later or he cannot sue me for any reasons or -- and it
22 was like a confidentiality issue in that separation
23 agreement.

24 Q. And do you understand that in this instance
25 you are subpoenaed under the power of the Court?

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1 A. Absolutely.

2 Q. And that would include matters that would
3 otherwise be confidential?

4 A. Can you repeat that again?

5 Q. Yeah. Do you understand that because you're
6 under subpoena by the Court to give your testimony, --

7 A. Today.

8 Q. -- truthfully -- yes.

9 A. Uh-huh.

10 Q. That the confidentiality agreement would not
11 control; the Court's subpoena --

12 A. Yeah.

13 Q. -- controls?

14 A. I understand that.

15 Q. You mentioned Ghislaine Maxwell did photo
16 shoots and kept an album?

17 A. Yes. She was fanatic about photographs --
18 camera. She had a whole bunch of different cameras and
19 she took all the pictures all over.

20 Q. Did you ever observe her doing a photo shoot
21 of V.?

22 A. No.

23 Q. Did you ever observe her doing a photo shoot
24 of any of the other young women whose names you
25 mentioned?

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1 A. Young woman?

2 Q. Yes.

3 A. No, I can't remember. I know that she went
4 out and took pictures in the pool because later on I
5 would see them at the desk or at the house.

6 And nude -- 99.9 percent of the time they were
7 topless. They were European girls. They were --

8 Q. You stated that you believe V.'s name was P.,
9 but you weren't sure?

10 A. Not sure.

11 Q. Could it have been R.?

12 A. R., yeah. Yeah. Could have been.

13 Q. I want to show you a picture and have it
14 marked as an Exhibit to this deposition.

15 MS. EZELL: And did we have the agreement
16 beforehand that we've been having all along that
17 we're just using initials and not names?

18 MR. WILLITS: My client has waived the
19 confidentiality as to herself. But I certainly
20 agree as to everybody else.

21 MR. LANGINO: As do I.

22 MS. EZELL: Is that okay?

23 MR. CRITTON: That's what we agreed to on the
24 last.

25 MS. EZELL: Right.

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1 MR. CRITTON: For the court reporter, at
2 least, in terms of the -- I guess in terms of the
3 transcript she gives to us, if you would just use a
4 first initial and a last initial.

5 MR. WILLITS: So when you ask about V., it
6 would be V.R. is what the court reporter would
7 write down?

8 MS. EZELL: Right.

9 MR. CRITTON: But make sure everybody uses the
10 full name, because that way we'll have two
11 initials.

12 MR. WILLITS: When they speak, but she's going
13 to write it down as initials. Is that what you're
14 saying? I'm confused about everything.

15 MR. CRITTON: The reason is, is there may be
16 25, you know, there may be three V.s. So if you
17 just mention V. and it just shows up as a V., it
18 won't make sense. So ergo you need to do that.

19 But [REDACTED], his client, she gets the
20 whole megillah.

21 MR. WILLITS: Right.

22 MR. BERGER: How is it preserved that we're
23 talking about your client? You gave her full name
24 a minute ago. How is it preserved if she's -- the
25 court reporter is going to change the full name to

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1 V.R.? Obviously the tape preserves it. We're not
2 asking the tape gentleman to edit it.

3 MS. EZELL: Right.

4 MR. BERGER: So how is it preserved that V.R.
5 means your client's full name?

6 MS. EZELL: Well, we had just agreed in
7 previous depositions that that's the way it would
8 read. The written transcript would not have the
9 full name, but would just have the initials.

10 MR. BERGER: I'm not so sure that constitutes
11 an identification by Mr. Alessi that's going to be
12 clear. But this is the first deposition I've
13 attended, so I'm not sure if I'm -- if what I'm
14 saying has been dealt with or not.

15 MR. MERMELSTEIN: I think we're working on
16 good faith. Mr. Critton is agreeing that the
17 name -- and I don't think anyone's going to come
18 back later and say, [REDACTED], you meant Vince [REDACTED] or
19 anything like that, so...

20 MR. BERGER: Well, I'm not -- I'm not talking
21 about Mr. Critton. Bob Critton I have the full
22 trust in. I'm just talking about a jury watching
23 this or reading this transcript believing that
24 Mr. Alessi has accurately identified one of these
25 victims. That's all. I don't know if you've all

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1 thought about that.

2 MS. EZELL: Well, for one thing, the jury
3 might, if they're -- if they're hearing or reading
4 his testimony, they most likely would be seeing the
5 video, which would have the full name. Unless the
6 Judge allows us to block out names and we haven't
7 come to that point.

8 MR. MERMELSTEIN: I think the idea at trial,
9 V.R., if it's read to the jury would become then
10 V.R. It would be read as V.R. But if it's filed
11 with the Court, this transcript, it will be V.R.,
12 and that way it doesn't have to be redacted.

13 MR. WILLITS: As I also understood it, if
14 there would be any question at all, we could simply
15 ask the court reporter and she would say, according
16 to my notes, V.R. is Virgil [REDACTED] and not -- or
17 whatever her notes show. Wouldn't she be the final
18 authority?

19 MS. EZELL: Well, she would certainly have
20 that record.

21 MR. CRITTON: You could listen to the tape.
22 It would be pretty easy. I think we're making it a
23 lot more complicated than it need be.

24 MR. WILLITS: For once, I agree.

25 MR. CRITTON: I think it will be all right.

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MS. EZELL: I'm going to ask -- I don't know whether you've still been serially designating Exhibits or whether we're doing them separately for deposition.

MR. CRITTON: I think we cannot trust that people will do them serially. I'd do them with each one.

MS. EZELL: Then would you mark this, please, as Exhibit 1 to this deposition.

And I'm just going to state on the record that I will keep that original. We will not attach it to the deposition.

(Exhibit number 1 was marked for identification purposes and retained by Counsel for the Plaintiffs.)

THE WITNESS: Yes, that's --

BY MS. EZELL:

Q. Can you identify that -- the young woman in those pictures?

A. Yes.

Q. Who is it?

A. That's V. -- V. Now that you says R., that is V.R. definite, a hundred percent.

MR. CRITTON: Let me just note my objection, as I did in A. Rod's deposition or Mr. Rodriguez's

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deposition, that I know you're going to confiscate Exhibit number 1. I think it's inappropriate. I think I should be allowed to have a copy of Exhibits that are being used in deposition. But I'll file a motion with the Court so we don't get into a pulling match over your Exhibits.

MR. BERGER: I would ask that the court reporter initial that.

MS. EZELL: Sure.

■, you did?

MR. WILLITS: She marked it.

MR. BERGER: Did she put her initials or did she just put a number or a letter?

MR. CRITTON: She's nodding that she did everything that she usually does, which means, initials, date and number.

MR. MERMELSTEIN: You can talk.

MR. WILLITS: But when you talk, use your initials.

BY MS. EZELL:

Q. How old did you think V.R. was at the time she began coming to Mr. Epstein's home?

A. She could have been 17, 18, 19.

Q. Could she have also been 15?

MR. CRITTON: Form.

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THE WITNESS: Could have been. But, you know, I am not -- I don't think I am a very good judge of ages. If you ask me how old you are, I really couldn't tell you.

MR. CRITTON: Kathy thinks she's 25.

MS. EZELL: In my dreams.

THE WITNESS: Now, again, I must tell you, I was never told to check any i.d.s on any of the people who work at the house.

BY MS. EZELL:

Q. I understand that. And, so, I think I'm just trying to establish that you didn't consider it part of your job description to worry about or consider the ages --

A. No.

Q. -- of the young women that came there?

A. Absolutely not. Absolutely not.

Q. And, so, you never really focused on that or particularly thought about it if they seemed young?

MR. CRITTON: Form.

THE WITNESS: I don't -- I didn't see that many young girls, you know, young, underage girls at the house. I never saw except the two girls that I mentioned that I think it was underage was N. for sure because she was still in high school.

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And she -- she had dinner with her mother, a couple times with her mother. And she become an actress. She's an actress and she has done movies. And he help her in her career.

That's the only girl that I knew she was young because she was going to high school and I pick her up from high school sometimes. But she was not a massage therapist. She will go for dinner. And they will go for the movies and she sang sometimes because she was a ■. So she sung at the house. Beautiful girl. Very talented.

That's the only girl that I know that it was -- I would say, underage.

BY MS. EZELL:

Q. Okay. Did -- who told you that V.R. was a massage therapist?

A. Nobody.

Q. Did you assume that she was a massage therapist because you were told she was coming to give a massage?

A. No. I assumed she was a massage therapy because I was -- I drove Ms. Maxwell to Mar-a-lago, Donald Trump's residence. And I wait in the car while Ms. Maxwell got a -- I think it was a facial or massage. I don't know. But that day I remember this girl, V.,

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1 walking down from the main lobby towards the spa of
2 Mar-a-lago. And I was driving Ms. Maxwell up, up the
3 ramp. It's a little ramp there.

4 And Ms. Maxwell says, stop. And she went and
5 talked to -- she went inside.

6 And that afternoon around 5:00 I saw V. came.
7 She came to the house already, so she was there already.
8 That was the first day I knew. And then she would come
9 regularly.

10 Q. Did you ever meet any of V.'s family?

11 A. No. I think she was -- one time I think her
12 father drove her there. And I met -- I don't know if it
13 was the boyfriend or husband or -- but he had to wait,
14 make him wait outside while she was at the house.

15 Q. Do you know the name or recognize the name
16 Tony [REDACTED]?

17 A. I think it was him.

18 Q. That was her --

19 A. I know he had an old beat-up car, Camaro or
20 Mustang. I know it was very old car that I make him
21 wait on the street one time. I make him come out of the
22 driveway because we have to move some cars around.

23 Q. Did there ever come a time when Tony [REDACTED]
24 was welcome in the kitchen?

25 A. I think he came once in the kitchen, but

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1 Ms. Maxwell told me to get him out.

2 Q. Did she tell you why?

3 A. No. She didn't -- I guess she didn't want to
4 become, you know, everybody -- because some of these
5 people came with their husbands and they wait outside.
6 And I guess she didn't want this to become a norm for
7 everybody to bring their companions while they have --
8 they will do a massage for her.

9 Q. During the time you were there, did you ever
10 know of Tony [REDACTED] bringing any other girls to
11 Mr. Epstein?

12 A. No. I knew that sometimes I saw V. bring
13 other girls with her, not Tony [REDACTED].

14 Q. Do you remember the names of any of those
15 girls --

16 A. No, I don't.

17 Q. -- that V. brought?

18 A. That was at the end of my stay there. No.
19 That was a very -- at the very end of the last month of
20 my stay.

21 Q. Did you give -- I don't believe I asked you,
22 but if I did, forgive me. Did you give us an
23 approximate year in which you were taking Ms. Maxwell to
24 Mar-a-lago and saw V.R. for the first time?

25 A. That was at the -- at the end of my stay

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1 there. So I would say, between three months maybe
2 before I left. And I think I left at the end of the
3 year, so it could have been -- I remember it was a very
4 hard day because I had to wait in the sun outside in a
5 convertible and I was dying, waiting for an hour for
6 Ms. Maxwell. I think it was in the summer of 2002.

7 Q. And if I remember correctly, you left in
8 November or December of 2002?

9 A. Yes.

10 Q. So that might have been perhaps July or August
11 of 2002?

12 A. Uh-huh.

13 Q. And, so, as I understand it, you only saw V.R.
14 come to that house during the last three months of your
15 time at Mr. Epstein's?

16 A. Yes.

17 Q. Do you have any -- any sense or can you
18 approximate how many times she came?

19 A. I cannot give you a number, but I would say,
20 two, three times a week.

21 Q. You mentioned that sometimes you would have to
22 call these massage therapists in the middle of the
23 night. Did you ever have to call V. for Mr. Epstein in
24 the middle of the night?

25 MR. CRITTON: Form.

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1 THE WITNESS: No. No.

2 BY MS. EZELL:

3 Q. Did there come a time while you were there
4 that V.R. stayed in the house?

5 MR. CRITTON: Form.

6 THE WITNESS: I don't think so. I cannot
7 remember. No.

8 BY MS. EZELL:

9 Q. How many bedrooms were there upstairs?

10 A. One, two, three -- one, two, three, four --
11 four -- so that would be five, five bedrooms.

12 Q. Five. And, so, would one have been
13 Mr. Epstein's bedroom?

14 A. Yes. His quarters was big, huge quarters.

15 Q. Sort of a suite?

16 A. Yeah. And he has -- this is the room. His
17 bathroom was here and her bathroom was here. The main
18 room was here. And we have -- it was two sets of doors
19 before -- two sets of double doors before you can go
20 into the suite. There was one on top of the stairway
21 and one in the middle of the hallway. And then you walk
22 into the -- into the suite.

23 Q. Okay. And you -- you just put a red eight by
24 11 folder in front of you?

25 A. Yeah.

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1 Q. And you said, "this is the room."
 2 Do you mean that is Mr. Epstein's room?
 3 A. And Ms. Maxwell.
 4 Q. And Ms. Maxwell?
 5 A. Yes.
 6 Q. And his bath was on one side and hers was on
 7 the other?
 8 A. Yes. Yes, [REDACTED].
 9 Q. So did she not have a separate bedroom?
 10 A. Ms. Maxwell? No. Sometimes she slept in a
 11 different bedroom. Don't ask me why.
 12 Q. Okay. But generally at that point in time she
 13 was still --
 14 A. Yeah.
 15 Q. -- sleeping in, for most nights, the same
 16 bedroom --
 17 A. Yeah.
 18 Q. -- as Mr. Epstein?
 19 A. Uh-huh.
 20 Q. And then there was the service quarters, the
 21 service department?
 22 A. The service quarters before we moved down to
 23 the other house, it was in one corner of the property in
 24 the second floor.
 25 Q. And what -- what other bedrooms were there?

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1 A. In the service quarters?
 2 Q. No.
 3 A. In the total amount?
 4 Q. On the second floor.
 5 A. On the second floor.
 6 Q. Other than --
 7 A. It was the -- it was a pink room, we called
 8 the pink room. We called the blue room. And the parrot
 9 room. We call a parrot room because there was a crazy
 10 designer, all full of parrots. It look like you were in
 11 the jungle. But that was changed, so that became the
 12 blue room.
 13 So it was the blue room, the red room and the
 14 pink room. That was the main guest, for the main guest
 15 rooms.
 16 Then it was my room and we have like a little
 17 sitting area for ourselves, for myself.
 18 And upstairs there were one, two, three, four,
 19 five, six, six bathrooms.
 20 Q. During the time you were there who, if anyone,
 21 stayed in the pink room?
 22 A. Many people.
 23 Q. Guests?
 24 A. Yes.
 25 Q. Who would come and go?

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1 A. Yes.
 2 Q. And who, if anyone, stayed in the blue room?
 3 A. Yes, many.
 4 Q. Guests who would come and go?
 5 A. (Nods head.)
 6 Q. And in the red room?
 7 A. Same thing.
 8 Q. Again, guests?
 9 A. Yes.
 10 Q. And did you say that N.B. did spend nights
 11 there?
 12 A. No, not that I remember.
 13 Q. She never did?
 14 A. Not that I remember, no. Because she was not
 15 there until the whole length of time that I work for
 16 Mr. Epstein. She was there for maybe a year or two
 17 years. Then she moved to California. She was -- moved
 18 the whole family to Hollywood.
 19 Q. And that's N.B.?
 20 A. N.
 21 Q. You mentioned Dr. Eva [REDACTED]?
 22 A. Uh-huh.
 23 Q. I believe you said she had been a girlfriend
 24 of Mr. Epstein's --
 25 A. Yeah.

Page 56

1 Q. -- before --
 2 A. I understand.
 3 Q. -- Ms. Maxwell?
 4 A. Yeah.
 5 Q. And were there times when she would stay in
 6 the house?
 7 A. Yes.
 8 Q. Would she stay in the house when Ms. Maxwell
 9 was there as well?
 10 A. Yes.
 11 Q. And did she have sort of a regular room there?
 12 A. Let me repeat. Can you repeat that again, the
 13 questions before? Because I think I says, yes, when
 14 Eva -- when Maxwell was there, I not think -- I can't
 15 remember Eva being there. She was there for a little
 16 bit because they become friends after that and they have
 17 dinners and lunches and she would come, because Eva got
 18 married and she had kids and -- and they were -- called
 19 Mr. Epstein, Uncle Jeffrey.
 20 So they become friends. And -- but I don't
 21 think she ever slept at the house again because she had
 22 her own house in Palm Beach.
 23 Q. When you first went there to work would she
 24 sometimes sleep at the house? Was that before she was
 25 married?

14 (Pages 53 to 56)

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1 A. Yes. Before she was married, yeah. They
2 split up and she went her own way.

3 Q. Did she marry a Glen [REDACTED] (phonetics)?

4 A. That's correct. And Mr. [REDACTED] used to come to
5 the house, too.

6 Q. Do you know, was [REDACTED] ever one of the
7 massage therapists before she became an assistant?

8 A. I don't know if she was a massage therapist.
9 I don't remember setting up a massage table for her. I
10 think she was an assistant. And she would call -- at
11 the end of my stay, I was -- tried to pull aside from my
12 obligations and Sarah was doing all the phone calls and
13 all the arrangement and all the looking out for these
14 girls for the -- for massage therapists. They were
15 constantly.

16 Q. When did that role get transferred from you to
17 Ms. Maxwell, the role of looking after girls and calling
18 the girls?

19 A. I didn't look after -- out for girls.
20 Ms. Maxwell was the one that recruit -- I remember one
21 occasion or two occasions she would says to me, John,
22 give me a list of all the spas in Palm Beach County.
23 And I will drive her from one to the other one to PGA
24 and Boca. And she will go in, drop credit cards -- not
25 credit cards, but business cards, and she come out. And

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1 then we go to -- she will recruit the girls. Was
2 never -- never done by me or Mr. Epstein or anybody
3 else, that I know.

4 I don't know about Sarah because Sarah was
5 there at the last, last -- probably last weeks of my
6 stay there. So I cannot say anything about Sarah.

7 Q. Was there any point in time -- well, let me
8 ask you this way: Did -- you said sometimes you would
9 call the girls to come --

10 A. Uh-huh.

11 Q. -- to give them massage. And sometimes
12 Ms. Maxwell would?

13 A. Yeah.

14 Q. Did there come a time when she took that over
15 entirely from you --

16 A. No.

17 Q. -- or that continued --

18 A. That's continued.

19 Q. -- until you left?

20 A. Yeah.

21 Q. Do you remember, is Jeffrey Epstein godfather
22 to one of the [REDACTED] children?

23 A. I don't know if he godfather. I don't
24 remember that. But he was very fond to these children,
25 the children.

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1 Q. And they called him uncle, you said?

2 A. They called him uncle.

3 Q. Did you ever learn what Tony [REDACTED] did for
4 a living?

5 A. No.

6 Q. Have you had any occasion to see him since the
7 time you left Mr. Epstein's employ?

8 A. No.

9 Q. And you don't -- do you have any idea where he
10 is?

11 A. I have no idea. I remember an incident, one
12 time the -- I went to pick her up at [REDACTED] Palm Beach
13 and she was crying and I went and knock at the door and
14 she was crying. And she says, well, -- I think it was
15 Tony or -- because she used to live with these other
16 guys, too. There were two guys and her or two couples.
17 I don't know the arrangements there. But I remember
18 that she told me the -- Tony or her boyfriend had got
19 mad and ripped the furniture, he cut the furniture in
20 pieces and he even broke the screens. Because I was --
21 when I went into to knock the door, the screen was all
22 ripped up like it was cut.

23 And she told me that he got mad at -- I don't
24 know what happened. I never saw him in there.

25 Q. Did she tell you he had hit her or beaten her

Page 60

1 at all?

2 MR. CRITTON: Is the she, V., V.R.?

3 MS. EZELL: Yes. Thank you.

4 BY MS. EZELL:

5 Q. Did you ever see during the time you were
6 there photographs of V. in the house, the Epstein house?
7 V.R. in the Epstein house?

8 A. I don't think so. I don't think so.

9 Q. Did you ever see photographs of V.R. in
10 Ms. Maxwell's albums?

11 A. No.

12 Q. At the time you were employed by Mr. Epstein,
13 were there any hidden cameras?

14 A. No.

15 Q. You do know that he installed some after you
16 left, correct?

17 MR. CRITTON: Correct.

18 THE WITNESS: I don't know.

19 BY MS. EZELL:

20 Q. Wasn't there a camera involved in the incident
21 that -- the incident in which you took money from
22 Mr. Epstein?

23 A. Yeah. Yes. But I don't know if he install it
24 or not. That's what he told me.

25 Q. Okay.

15 (Pages 57 to 60)

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1 A. But we settled that completely out of Court.
2 It was a, I will pay you back. I'm sorry. I made a
3 mistake. And that was the end of it.

4 Q. I understand. And, so, you have no idea then
5 where the cameras were --

6 A. No idea.

7 Q. -- installed?

8 A. I was never back at the house after that.

9 Q. Okay. I just want to ask you if you recognize
10 any other names.

11 Do you recognize a name, E., who was a friend
12 of Ms. Maxwell?

13 A. E.T.? Yes.

14 Q. And was she English?

15 A. English. And she travel all the time with
16 them. Not -- I would say, not a hundred percent of the
17 time, but she travel maybe 60, 70 percent of the time
18 for a period of years.

19 MR. CRITTON: So I'm clear, is it Annie?

20 MS. EZELL: E.

21 THE WITNESS: E.T.

22 MS. EZELL: E. or E. I'm not sure.

23 MR. CRITTON: Thank you.

24 BY MS. EZELL:

25 Q. Did she have a regular room in which she

Page 62

1 stayed --

2 A. Yes.

3 Q. -- when she was there? Which one was that?

4 A. That was the pink room. When she came, she
5 stay in the pink room.

6 Q. And do you have any idea what her relationship
7 to Ghislaine Maxwell was?

8 A. I understand she was her assistant. And she
9 will answer the phones. And she will go shopping with
10 her sometimes. And she will -- basically they were
11 friends. I don't think she -- I don't think she was a
12 massage therapist ever. I don't think she ever was a
13 massage therapist.

14 Q. Do you know whether the young women that you
15 referred to as massage therapists came there to give
16 massages to both Mr. Epstein and Ms. Maxwell?

17 A. Yes.

18 Q. And do you know if E. was ever included in
19 that activity?

20 A. I have no idea because when they went upstairs
21 they shut all the doors and it was absolutely pitch
22 black in the room. It was no -- we never saw any
23 massages done. Occasionally we saw a massage, like, if
24 Ms. Maxwell wants a massage by the pool, I would set up
25 the table by the pool and they will have a massage at

Page 63

1 the pool. But other than that, they were regular
2 massages.

3 Q. Did you know a young lady named C. who would
4 come to the home?

5 A. C. She was also English?

6 Q. I don't know?

7 A. I think I remember a C.

8 Q. And was she one that came to give massages?

9 A. C., C., C., C., C., C.

10 When you deal with all these girls' names. I
11 think C. was, yes, she was a massage therapist. But I
12 think she used to -- I could be wrong, but I think she
13 live in New York and she travelled with them once in a
14 while.

15 Q. Were some of the women that travelled with
16 Mr. Epstein models, to your understanding?

17 A. Very beautiful models. Very nice. Very,
18 very -- most of them were models, models.

19 Q. Did you know anyone named C.F.?

20 A. No. C.F. no. No.

21 Q. Jean Luc Bruhel?

22 A. Jean Luc? Jean Luc was a guy.

23 Q. I know that. Did you know him?

24 A. Yes, I know him.

25 Q. Who was he?

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1 A. He was -- he -- matter of fact, I went to his
2 house a couple of times with Mr. Epstein. And he was a
3 friend of Mr. Epstein. He was a -- he was [REDACTED], I
4 think, [REDACTED]. And he was -- as far as I know, he had a
5 model agency in Miami, one of the big model agencies in
6 Miami.

7 Q. And do you know whether or not Mr. Epstein had
8 any interest in that model agency?

9 A. No. No idea.

10 Q. Do you know whether or not they were business
11 partners in any way?

12 A. No, I don't.

13 Q. Did he ever come over for massages?

14 A. He came to the house couple times. I think
15 he -- it might have been occasions where he stay
16 overnight.

17 MR. CRITTON: Move to strike as
18 non-responsive, to at least your question.

19 BY MS. EZELL:

20 Q. You indicated that you had been to his home.
21 So did he have a home in Palm Beach?

22 A. No. He has a home in Miami Beach.

23 Q. Miami Beach.

24 Did you know anyone named D. or D.B.?

25 A. D.?

16 (Pages 61 to 64)

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1 Q. D.
 2 A. It sounds familiar, but I cannot tell you for
 3 sure.
 4 Q. You mentioned some of the chefs. You didn't
 5 mention --
 6 A. There was --
 7 Q. -- Ryan Dion (phonetics). Was there someone
 8 there named Ryan Dion?
 9 A. No. It was a kid from New York. His name was
 10 Don [REDACTED].
 11 Q. And would he travel with Mr. Epstein?
 12 A. Yeah.
 13 Q. Now, when -- before the addition out back was
 14 done, I believe you said the chefs would stay back there
 15 sometimes?
 16 A. Uh-huh.
 17 Q. Before then, where did the chefs stay?
 18 A. In the blue room in the back, the one close to
 19 mine.
 20 Q. Did you ever meet any of Mr. Epstein's family;
 21 his brother, for instance?
 22 A. Absolutely, yes.
 23 Q. And what was his brother's name?
 24 A. Mark Epstein.
 25 Q. Would he come and visit regularly?

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1 A. Regularly.
 2 But I was more involved with her mother. I
 3 took care of her mother, Mr. Epstein's mother. She was
 4 a very ill lady. I don't know if she's still alive or
 5 not, but I lost contact.
 6 Q. How often would she come to visit?
 7 A. She didn't come to visit too often. She had
 8 an accident, a very bad accident. She lost her trachea,
 9 so she had a -- how they call the -- the thing they put
 10 them in your neck to talk?
 11 Q. Sort of a voice box. I don't know the
 12 technical name.
 13 A. I don't know the technical name, --
 14 Q. Right.
 15 A. -- but they open her throat and she had this
 16 thing to talk and she had to cover her throat to talk.
 17 And I was more involved with her than her own
 18 kids. I took her to Miami for the operation. I was
 19 there for the operation. And she -- we have a lot of
 20 fun with her. I mean, she -- she was a very good lady.
 21 Q. Now, other than Mark Epstein, were there any
 22 other brothers and sisters?
 23 A. No. He only has one brother that I know.
 24 Q. And where does he live?
 25 A. He lives in New York.

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1 Q. And do you know what he did for a living?
 2 A. He has -- I knew he had a printing company,
 3 printing the big logos, the big movie projection
 4 company.
 5 Matter of fact, my son, when he graduate, he
 6 went to work for Mark for about couple months in New
 7 York as a -- as a -- as a trainee. I don't think he
 8 ever got paid, but he -- he was trying to learn the
 9 business and Mark gave him a job. That was for few
 10 months.
 11 Q. How often would Mark Epstein come to Miami?
 12 A. Not too often. Not too often.
 13 Q. When he came, do you know, did he participate
 14 in having the massages?
 15 A. No.
 16 MR. CRITTON: Form.
 17 THE WITNESS: Never.
 18 BY MS. EZELL:
 19 Q. He did not?
 20 A. Never.
 21 Q. And how do you know that?
 22 A. Because it was never -- I was never told to
 23 set up a massage in any of the rooms for Mark or his
 24 mother. They were not too close.
 25 Q. Mark and Jeffrey Epstein are not too close?

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1 A. I would says, they were not. I don't think
 2 so. That was my opinion.
 3 Q. Do you know the name Daniel Estes?
 4 A. No.
 5 Q. Do you know the name Matt Groning (phonetics)
 6 -- Groning?
 7 A. No.
 8 Q. I think you mentioned Mr. Wexler?
 9 A. I believe so.
 10 Q. That you knew him early on?
 11 A. Yes.
 12 Q. And did some work for him?
 13 A. Also his mother. I work on his mother house
 14 in Palm Beach.
 15 Q. Did he also have a home in Palm Beach?
 16 A. Before -- he had a home in Palm Beach before I
 17 went to work for his mother. So I never work on his
 18 home. But I work on his mother home. I don't know if
 19 it was his home or that was used to -- Mrs. Wexler used
 20 to live there.
 21 Q. Did he come over to the Epstein home
 22 frequently?
 23 A. Occasionally.
 24 Q. Did he ever participate in the massages?
 25 A. No.

17 (Pages 65 to 68)

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1 MR. CRITTON: Form.

2 THE WITNESS: No, not that I can remember.

3 BY MS. EZELL:

4 Q. Do you know if he and Mr. Epstein were
5 involved in any businesses together?

6 A. Mr. Epstein, I never knew what businesses he
7 was involved. He will -- I was completely shut off of
8 all of the business, except for the office, transfer of
9 communications or faxes. But I have no idea of the
10 relationship with other business partners.

11 Q. Did you ever have to deal with his -- the
12 office in New York with someone named Lesley in New
13 York?

14 A. The secretary?

15 Q. Yes.

16 A. Yeah. I would call -- I would call Lesley
17 almost every day or other secretaries, they live in New
18 York. Basically it came a point when Mr. Epstein will
19 call New York and New York call me to do things for
20 Mr. Epstein. But he was on the phone or busy or
21 something and he would call the office and the office
22 will send me an e-mail or call me or -- it was a
23 constant report with the office in New York.

24 Q. And did you in turn sometimes call New York to
25 get a message to Mr. Epstein?

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1 A. Yes.

2 Q. Did you ever overhear Mr. Epstein talking to
3 any people that you would consider celebrities?

4 A. Yes. I knew some -- many celebrities.

5 Q. Who -- what celebrities did you understand
6 that he spoke with?

7 A. He spoke to it?

8 Q. Yes.

9 A. I don't know who he spoke to because I never
10 listen to his conversations. But I saw guests at the
11 house that were celebrities.

12 Q. Who did you see at house?

13 A. Many. It was senators. It was Senator
14 Mitchell, [REDACTED] Mitchell. It was Prince Andrew. It
15 was Princess Sarah.

16 Q. Princess?

17 A. Sarah, the wife of Andrew.

18 Q. Sarah [REDACTED]?

19 A. [REDACTED].

20 And it was a couple Misses, Misses Yugoslavia,
21 Miss Germany that I don't even know the names. But they
22 were a lot of queens and other famous people that I
23 can't remember. It was a very famous lawyers that I'm
24 sure you know, Alan Dershowitz, who spend at the house a
25 couple times. And he slept there. He -- Princess

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1 Diane's secretary, she stay there for a week with her
2 kids and we took care of her.

3 Who else? Mr. Trump. That's a celebrity.
4 Mr. Robert Kennedy, Junior. Mr. Frederick Fekkai.

5 Q. Who is that?

6 A. Fekkai, Frederick Fekkai, the famous
7 hairstylist. Who else? I don't think I can remember
8 anymore.

9 Q. David Copperfield, the magician?

10 A. No, I never saw him.

11 Q. You never saw him.

12 Now, would these -- the people that you named
13 were all people that you saw visiting in the home?

14 A. Yes. Also was a Noble Prize winners, the -- I
15 can't remember his name. It was an old gentleman. He
16 was a Noble Prize, chemistry, I think, or mathematics.
17 There was a couple -- a couple of those, very -- also,
18 we had at one time at the house, it was a reunion of
19 very Noble Prize winners. But I don't know. They're
20 not famous, I guess. I can't remember their names.
21 Very important people.

22 Q. Was that a dinner or a reception?

23 A. I think it was a lunch.

24 Q. A lunch.

25 President Clinton, did you ever --

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1 A. I met President Clinton on Mr. Epstein's plane
2 in the last, I think it was the last month or just
3 before I left -- I left, I met President Clinton in
4 Miami at his plane. We drove him to Miami.

5 Q. And do you know, was that a trip -- were they
6 going on a trip to Africa?

7 A. I hear about it, but it was not when I was
8 there.

9 Q. So that was not the time that you drove --

10 A. No, I was already out.

11 Q. And Kevin Spacey, did you ever meet him?

12 A. No. I hear about it on the news, but I never
13 met him.

14 Q. Were Prince Andrew and Princess Sarah friends
15 of Ms. Maxwell?

16 A. Both of them.

17 Q. Both Ms. Maxwell and Mr. Epstein?

18 A. Yeah.

19 Q. Did -- did they ever have massages when they
20 were there?

21 A. Prince Andrew did. I think Sarah was there
22 only once and for a short time. I don't think she slept
23 in there. I cannot remember. I think she was visiting
24 Wellington and she came to the house and we met her.
25 But Prince Andrew, yes, Prince Andrew spent weeks with

18 (Pages 69 to 72)

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1 us.

2 Q. Where would he sleep?

3 A. In the main room, the main guest bedroom.
4 That was the blue room.5 Q. And, so, when he would come and stay, during
6 that time would he frequently have massages?

7 MR. CRITTON: Form.

8 THE WITNESS: I would says, daily massages.

9 They have a daily massage.

10 BY MS. EZELL:

11 Q. Was it sometimes more than one a day?

12 A. I can't remember if he had more than one, but
13 I think it was just a massage for him. We set up the
14 tables and --15 Q. Do you have any recollection of V.R. coming to
16 the house when Prince Andrew was there?

17 A. It could have been, but I'm not sure.

18 Q. Not sure. When Mr. Dershowitz was
19 visiting, --

20 A. Uh-huh.

21 Q. -- how often did he come?

22 A. He came pretty -- pretty often. I would says,
23 at least four or five times a year.

24 Q. And how long would he stay typically?

25 A. Two, three days.

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1 Q. Did he have massages sometimes when he was
2 there?3 A. Yes. A massage was like a treat for
4 everybody. If they want it, we call the massage and
5 they have a massage.6 Q. Now, Mr. Trump had a home in Palm Beach,
7 correct?

8 A. Uh-huh.

9 Q. So he didn't come and stay there, did he?

10 A. No, never.

11 Q. He would come for a meal?

12 A. He would come, have dinner. He never sat at
13 the table. He eat with me in the kitchen.

14 Q. Did he ever have massages while he was there?

15 A. No. Because he's got his own spa.

16 Q. Sure.

17 MS. EZELL: I don't have any other questions
18 right now. I'd just like to reserve if something
19 comes up to ask. But, otherwise, you may go ahead.20 MR. LANGINO: It is noon, so I don't know what
21 everybody else's schedule is. I don't know how
22 you're feeling.

23 THE WITNESS: I am fine.

24 MS. EZELL: I do have another question. May I
25 ask it?

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1 MR. LANGINO: Go ahead. Sure.

2 BY MS. EZELL:

3 Q. You said that you set up the massage tables.
4 And would you also set up the oils and the towels?

5 A. Yes, [REDACTED].

6 Q. And I think I read one time you said they used
7 40 or 50 towels a day?

8 MR. CRITTON: Form.

9 THE WITNESS: That's correct. There was a
10 tremendous amount of work in the house, especially
11 laundry towels, because they were -- we have
12 towels, piles of towels. And they use in the pool.
13 There was a lot of people in the pool and there
14 were a towel that went in the floor, we have to go
15 and pick it up, wash it. So it was -- it was a lot
16 of towels, yes.

17 BY MS. EZELL:

18 Q. And did you ever have occasion to go upstairs
19 and clean up after the massages?

20 A. Yeah, uh-huh.

21 Q. Did you ever find any vibrators in that area?

22 A. Yes. I told him, yes.

23 MS. EZELL: And did you ask that? I'm sorry.

24 MR. CRITTON: Yes.

25 MS. EZELL: I don't know how I missed that.

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1 BY MS. EZELL:

2 Q. Since I did miss it, if you don't mind, let me
3 just ask you again.4 Would you describe for me what kinds of
5 vibrators you found?6 A. I'm not familiar -- not too familiar with the
7 names, but they were big dildos, what they call the big
8 rubber things like that (indicating). And I used to go
9 and put my gloves on and pick them up, put them in the
10 sink, rinse it off and put it in Ms. Maxwell --
11 Ms. Maxwell had in her closet, she had, like, a laundry
12 basket, one of those laundry basket that you put laundry
13 in. She have full of those toys. And that was -- and
14 that was me being professional, leaving the room ready
15 for bed when he would come back to the room again.

16 Q. Okay.

17 A. That happened a few times, few times.

18 Q. Were there other sex toys that you found in
19 the area --

20 A. No.

21 Q. -- sometimes? You mentioned she kept them in
22 a basket in her closet?23 A. She kept them in her basket. She had some
24 videos there and she have a costume there. I know that
25 she bought it, that she brought it with her.

19 (Pages 73 to 76)

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1 Q. What kind of costume?

2 A. I don't know. It was a black, shiny costume.
3 I never saw it on her.

4 Q. Was it leather?

5 A. No. I think it was like a vinyl. But we were
6 very fussy about touching any of that stuff. We just...

7 MS. EZELL: No other questions. Thank you,
8 sir.

9 THE WITNESS: You're welcome.

10 MR. LANGINO: I shouldn't have more than a
11 half hour's worth of questions, if everybody is
12 okay to power through.

13 MR. BERGER: I probably have a half hour to an
14 hour.

15 MR. LANGINO: Okay.

16 MR. BERGER: Unless you cover what I cover.

17 MR. MERMELSTEIN: I could say the same thing,
18 so probably less than that.

19 MR. LANGINO: So I guess my question is --

20 MR. BERGER: I think we ought to take a break.

21 MR. LANGINO: That was my question.

22 MR. BERGER: We're going to take a break.

23 Do you have any problem with that?

24 THE WITNESS: No. Whatever you guys want to
25 do.

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1 (Lunch recess.)
2 (Continued to Volume II.)
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1 CERTIFICATE OF OATH
2 STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5

6 I, the undersigned authority, certify that
7 JUAN ALESSI personally appeared before me and was duly
8 sworn on the 8th day of September, 2009.
9

10 Dated this 19th day of September, 2009.
11
12
13
14

15  

16 Sandra W. Townsend, Court Reporter
17 Notary Public - State of Florida
18 My Commission Expires: 6/26/12
19 My Commission No.: DD 793913
20
21
22
23
24
25

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1 CERTIFICATE
2 STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5

6 I, Sandra W. Townsend, Court Reporter and
7 Notary Public in and for the State of Florida at Large,
8 do hereby certify that the aforementioned witness was by
9 me first duly sworn to testify the whole truth; that I
10 was authorized to and did report said deposition in
11 stenotype; and that the foregoing pages numbered 1 to
12 78, inclusive, are a true and correct transcription of
13 my shorthand notes of said deposition.
14

15 I further certify that said deposition was
16 taken at the time and place hereinabove set forth and
17 that the taking of said deposition was commenced and
18 completed as hereinabove set out.

19 I further certify that I am not attorney or
20 counsel of any of the parties, nor am I a relative or
21 employee of any attorney or counsel of party connected
22 with the action, nor am I financially interested in the
23 action.
24

25 The foregoing certification of this transcript
does not apply to any reproduction of the same by any
means unless under the direct control and/or direction
of the certifying reporter.

Dated this 19th day of September, 2009.



Sandra W. Townsend, Court Reporter

20 (Pages 77 to 80)

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