

EXHIBIT 7

PART 1

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:
08-80232, 08-80380, 98-80381, 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
PROSE COURT REPORTING AGENCY
West Palm Beach Office

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1 PROCEEDINGS
 2 ---
 3 Deposition taken before Sandra W. Townsend, Court
 4 Reporter and Notary Public in and for the State of
 5 Florida at Large, in the above cause.
 6 ---
 7 VIDEOGRAPHER: Today is September 8, 2009.
 8 The time is 12 minutes after 10:00 in the morning.
 9 This is the videotaped deposition of Juan
 10 Alessi in the matter of Jane Doe number two versus
 11 Jeffrey Epstein. This deposition is being held at
 12 2139 Palm Beach Lakes Boulevard in West Palm Beach,
 13 Florida.
 14 My name is Stan Sanders. I'm the videographer
 15 representing Visual Evidence, Incorporated.
 16 Would the attorneys please announce their
 17 appearances for the record.
 18 MR. WILLITS: Richard Willits, representing
 19 Carolyn Andriano.
 20 MR. BERGER: William J. Berger, representing
 21 E.W., L.M. and Jane Doe number two.
 22 MR. MERMELSTEIN: Stuart Mermelstein of
 23 Mermelstein and Horowitz, representing Jane Does
 24 numbers two through eight.
 25 MR. LANGINO: Adam Langino, on behalf of B.B.

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1 MS. EZELL: Katherine Ezell from Podhurst
 2 Orseck, on behalf of Jane Does 101 and 102.
 3 MR. CRITTON: Bob Critton, on behalf of
 4 Jeffrey Epstein.
 5 THEREUPON,
 6 JUAN ALESSI,
 7 having been first duly sworn or affirmed, was examined
 8 and testified as follows:
 9 THE WITNESS: I do.
 10 DIRECT EXAMINATION
 11 BY MR. WILLITS:
 12 Q. Good morning, sir.
 13 A. Good morning.
 14 Q. I introduced myself through the videographer.
 15 My name is Richard Willits.
 16 A. Okay.
 17 Q. I represent a young lady by the name of
 18 Carolyn Andriano.
 19 A. Okay.
 20 Q. Is that name familiar to you at all?
 21 A. Whose name?
 22 Q. Carolyn Andriano. Do you recognize that name?
 23 A. No.
 24 Q. What is your residence address, sir?
 25 A. My address is 6791 Fairway Lakes Drive,

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1 Boynton Beach, Florida, 33472.
 2 Q. All right, sir. Did you ever work for Jeffrey
 3 Epstein?
 4 A. Yes, I did.
 5 Q. In what capacity?
 6 A. Everything. I started with Jeffrey Epstein
 7 around 19 -- please bear with the dates because I
 8 trying --
 9 Q. Sure.
 10 A. -- to remember. 1969 as a part-time
 11 maintenance guy.
 12 And then I become a full-time employee, I
 13 think it was January 1, 2 -- '91, '92, so '92. Sorry.
 14 Q. You said you started in 1969? That would
 15 be --
 16 A. No. No. No. No. No.
 17 Q. Okay.
 18 A. '99.
 19 Q. 1999?
 20 A. Yeah.
 21 Q. All right. And how did you happen to get that
 22 job? Was it through an employment agency --
 23 A. No.
 24 Q. -- or an ad in the paper?
 25 A. I had a company at that time used to take care

Page 8

1 of a lot of residents in Palm Beach. And I got to know
 2 Jeffrey through Lesley Wexner. And I used to work in
 3 about 20 different, 20, 25 different homes in Palm Beach
 4 as a maintenance guy.
 5 Q. Okay.
 6 A. And I have basically my own company and I do
 7 repairs for them. I did home sit in for them.
 8 Q. And what was -- did you work for Jeffrey
 9 Epstein? What was your position when you started?
 10 A. When I started, he hire me to -- he just
 11 bought the house.
 12 Q. I'm sorry?
 13 A. He just had bought the house --
 14 Q. Okay.
 15 A. -- where he live on El Brillo. And he hire me
 16 through Mr. Wexner's references to do repair works. And
 17 basically what I did the most was taking walls apart,
 18 windows and stuff that he didn't want to have it, --
 19 Q. I see.
 20 A. -- fix it.
 21 Q. And when you started working for Mr. Epstein,
 22 were you still working for other people in Palm Beach?
 23 A. Yes, I did.
 24 Q. Okay. And about how long a period of time did
 25 you do this type of work for Mr. Epstein, the

Page 9

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

Page 11

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.

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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.

Page 14

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

Page 15

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 french chef that was

Page 17

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 Kellen?
 13 A. Sarah, yes, I do. Sarah Kellen 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.

Page 18

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.

Page 20

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.

Page 21

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,

Page 22

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.

Page 23

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, Sarah Kellen, 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

Page 24

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 Anderson. And I really liked this girl. She was very

Page 25

1 nice, nice person.
 2 Q. Did you say Anderson or Underson?
 3 A. Anderson, 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 Anderson?
 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 says, 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?

Page 27

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, Morgan 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

Page 28

1 Epstein house for the purpose of massage, as far as you
 2 understood it?
 3 A. In the -- I would says, 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 Royal 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 Royal Palm Beach.
 2 She had -- she was living with a boyfriend and
 3 another person in this apartment complex in Royal 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.

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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

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<p>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</p>	<p>1 Q. -- the employment of Mr. Epstein, who were the 2 other employees? You mentioned Sarah Kellen. 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.</p>
<p>Page 34</p> <p>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 Kellen about the females who came to provide massage 13 services? 14 A. No. Sarah Kellen 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.</p>	<p>Page 36</p> <p>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</p>

9 (Pages 33 to 36)

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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. Oh, 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 Carolyn Andriano, 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, oh, you meant Vince Robinson 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 Robinson 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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1 MS. EZELL: I'm going to ask -- I don't know
 2 whether you've still been serially designating
 3 Exhibits or whether we're doing them separately for
 4 deposition.
 5 MR. CRITTON: I think we cannot trust that
 6 people will do them serially. I'd do them with
 7 each one.
 8 MS. EZELL: Then would you mark this, please,
 9 as Exhibit 1 to this deposition.
 10 And I'm just going to state on the record that
 11 I will keep that original. We will not attach it
 12 to the deposition.
 13 (Exhibit number 1 was marked for
 14 identification purposes and retained by Counsel for the
 15 Plaintiffs.)
 16 THE WITNESS: Yes, that's --
 17 BY MS. EZELL:
 18 Q. Can you identify that -- the young woman in
 19 those pictures?
 20 A. Yes.
 21 Q. Who is it?
 22 A. That's V. -- V. Now that you says R., that
 23 is V.R. definite, a hundred percent.
 24 MR. CRITTON: Let me just note my objection,
 25 as I did in A. Rod's deposition or Mr. Rodriguez's

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1 deposition, that I know you're going to confiscate
 2 Exhibit number 1. I think it's inappropriate. I
 3 think I should be allowed to have a copy of
 4 Exhibits that are being used in deposition. But
 5 I'll file a motion with the Court so we don't get
 6 into a pulling match over your Exhibits.
 7 MR. BERGER: I would ask that the court
 8 reporter initial that.
 9 MS. EZELL: Sure.
 10 Oh, you did?
 11 MR. WILLITS: She marked it.
 12 MR. BERGER: Did she put her initials or did
 13 she just put a number or a letter?
 14 MR. CRITTON: She's nodding that she did
 15 everything that she usually does, which means,
 16 initials, date and number.
 17 MR. MERMELSTEIN: You can talk.
 18 MR. WILLITS: But when you talk, use your
 19 initials.
 20 BY MS. EZELL:
 21 Q. How old did you think V.R. was at the time she
 22 began coming to Mr. Epstein's home?
 23 A. She could have been 17, 18, 19.
 24 Q. Could she have also been 15?
 25 MR. CRITTON: Form.

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1 THE WITNESS: Could have been. But, you know,
 2 I am not -- I don't think I am a very good judge of
 3 ages. If you ask me how old you are, I really
 4 couldn't tell you.
 5 MR. CRITTON: Kathy thinks she's 25.
 6 MS. EZELL: In my dreams.
 7 THE WITNESS: Now, again, I must tell you, I
 8 was never told to check any i.d.s on any of the
 9 people who work at the house.
 10 BY MS. EZELL:
 11 Q. I understand that. And, so, I think I'm just
 12 trying to establish that you didn't consider it part of
 13 your job description to worry about or consider the
 14 ages --
 15 A. No.
 16 Q. -- of the young women that came there?
 17 A. Absolutely not. Absolutely not.
 18 Q. And, so, you never really focused on that or
 19 particularly thought about it if they seemed young?
 20 MR. CRITTON: Form.
 21 THE WITNESS: I don't -- I didn't see that
 22 many young girls, you know, young, underage girls
 23 at the house. I never saw except the two girls
 24 that I mentioned that I think it was underage was
 25 N. for sure because she was still in high school.

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1 And she -- she had dinner with her mother, a couple
 2 times with her mother. And she become an actress.
 3 She's an actress and she has done movies. And he
 4 help her in her career.
 5 That's the only girl that I knew she was young
 6 because she was going to high school and I pick her
 7 up from high school sometimes. But she was not a
 8 massage therapist. She will go for dinner. And
 9 they will go for the movies and she sang sometimes
 10 because she was a singer. So she sung at the
 11 house. Beautiful girl. Very talented.
 12 That's the only girl that I know that it
 13 was -- I would says, underage.
 14 BY MS. EZELL:
 15 Q. Okay. Did -- who told you that V.R. was a
 16 massage therapist?
 17 A. Nobody.
 18 Q. Did you assume that she was a massage
 19 therapist because you were told she was coming to give a
 20 massage?
 21 A. No. I assumed she was a massage therapy
 22 because I was -- I drove Ms. Maxwell to Mar-a-lago,
 23 Donald Trump's residence. And I wait in the car while
 24 Ms. Maxwell got a -- I think it was a facial or massage.
 25 I don't know. But that day I remember this girl, V.,

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 Santiago?

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 Santiago
24 was welcome in the kitchen?

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

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 Santiago 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 Santiago.

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

1 there. So I would says, 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 says,
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.

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, ma'am.
 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 Anderson?
 22 A. Uh-huh.
 23 Q. I believe you said she had been a girlfriend
 24 of Mr. Epstein's --
 25 A. Yeah.

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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?

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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 Dubin (phonetics)?
 4 A. That's correct. And Mr. Dubin used to come to
 5 the house, too.
 6 Q. Do you know, was Sarah Kellen 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 Dubin 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 Santiago 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 Royal 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

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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.

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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 says, 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

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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

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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 French, I
 4 think, French. 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.?

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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 Perry. Perry?
 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.

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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, George Mitchell. It was Prince Andrew. It
 15 was Princess Sarah.
 16 Q. Princess?
 17 A. Sarah, the wife of Andrew.
 18 Q. Sarah Ferguson?
 19 A. Ferguson.
 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

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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, ma'am.
 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.

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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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CERTIFICATE OF OATH
 STATE OF FLORIDA
 COUNTY OF PALM BEACH

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

Dated this 19th day of September, 2009.

Sandra W. Townsend, Court Reporter
 Notary Public - State of Florida
 My Commission Expires: 6/26/12
 My Commission No.: DD 793913

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CERTIFICATE
 STATE OF FLORIDA
 COUNTY OF PALM BEACH


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

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

I further certify that I am not attorney or
 counsel of any of the parties, nor am I a relative or
 employee of any attorney or counsel of party connected
 with the action, nor am I financially interested in the
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Dated this 19th day of September, 2009.


 Sandra W. Townsend, Court Reporter