

# EXHIBIT 13

## PART 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

\_\_\_\_\_ /

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

\_\_\_\_\_ /

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

JEFFREY EPSTEIN,  
Defendant.

\_\_\_\_\_ /

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

\_\_\_\_\_ /

Page 2

1 JANE DOE NO. 6, Case No: 08-CV-80994  
 2 Plaintiff,  
 3 Vs  
 4 JEFFREY EPSTEIN,  
 5 Defendant.

6 \_\_\_\_\_/  
 7 JANE DOE NO. 7, Case No: 08-CV-80993  
 8 Plaintiff,  
 9 Vs

10 JEFFREY EPSTEIN,  
 11 Defendant.  
 12 \_\_\_\_\_/  
 13 C.M.A., Case No: 08-CV-80811  
 14 Plaintiff,  
 15 Vs

16 JEFFREY EPSTEIN,  
 17 Defendant.  
 18 \_\_\_\_\_/  
 19 JANE DOE, Case No: 08-CV-80893  
 20 Plaintiff,  
 21 Vs

22 JEFFREY EPSTEIN,  
 23 Defendant.  
 24 \_\_\_\_\_/  
 25

Page 3

1 JANE DOE NO. II, Case No: 08-CV-80469  
 2 Plaintiff,  
 3 Vs  
 4 JEFFREY EPSTEIN,  
 5 Defendant.

6 \_\_\_\_\_/  
 7 JANE DOE NO. 101, Case No: 09-CV-80591  
 8 Plaintiff,  
 9 Vs

10 JEFFREY EPSTEIN,  
 11 Defendant.  
 12 \_\_\_\_\_/  
 13 JANE DOE NO. 102, Case No: 09-CV-80656  
 14 Plaintiff,  
 15 Vs

16 JEFFREY EPSTEIN,  
 17 Defendant.  
 18 \_\_\_\_\_/  
 19

20 1031 Ives Dairy Road  
 21 Suite 228  
 22 North Miami, Florida  
 23 July 29, 2009  
 24 11:00 a.m. to 5:30 p.m.  
 25

Page 4

1 VIDEOTAPED  
 2 DEPOSITION  
 3 of  
 4 ALFREDO RODRIGUEZ  
 5  
 6 taken on behalf of the Plaintiffs pursuant  
 7 to a Re-Notice of Taking Deposition (Duces Tecum)  
 8  
 9 - - -

## APPEARANCES:

11 MERMELSTEIN & HOROWITZ, P.A.  
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Page 5

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13 BURMAN, CRITTON, LUTTIER &  
 14 COLEMAN, LLP  
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 17 Suite 400  
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 19 Attorney for Jeffrey Epstein.

## ALSO PRESENT:

20 JOE LANGSAM, VIDEOGRAPHER  
 21  
 22 - - -  
 23  
 24  
 25

<p style="text-align: right;">Page 6</p> <p>1 INDEX OF EXAMINATION</p> <p>2 WITNESS DIRECT CROSS</p> <p>3 ALFREDO RODRIGUEZ</p> <p>4 (By Mr. Mermelstein) 12</p> <p>5 (By Mr. Edwards) 157</p> <p>6 (By Mr. Langino) 260</p> <p>7</p> <p>8</p> <p>9</p> <p>10 INDEX OF EXHIBITS</p> <p>11 EXHIBITS PAGE</p> <p>12 1 Message pad 72</p> <p>13 2 Documents 115</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 Doe right here on the copy you gave me. I'm</p> <p>2 missing which Jane Doe this is.</p> <p>3 They're all different case numbers. Do</p> <p>4 you want me to go through each case number?</p> <p>5 MR. CRITTON: I'm going to note my</p> <p>6 objection. Obviously if this deposition</p> <p>7 gets played -- not obviously, I'm going to</p> <p>8 object to the litany of each one so I don't</p> <p>9 know how we can separate it out. Maybe if</p> <p>10 and when at the time of trial and depending</p> <p>11 on how the Court determines what comes in</p> <p>12 and what doesn't with regard to the</p> <p>13 consolidated aspects of this. I have no</p> <p>14 great idea other than just saying Jane Doe</p> <p>15 versus Epstein, et al, or something like</p> <p>16 that, or Jane Doe, et al.</p> <p>17 MS. EZELL: Couldn't we just say and</p> <p>18 those cases which have been consolidated</p> <p>19 with it for Discovery purposes?</p> <p>20 MR. EDWARDS: Although there is cases</p> <p>21 here that have cross noticed this from state</p> <p>22 court that haven't been consolidated so that</p> <p>23 may not work. You may have to read them</p> <p>24 all, if it works out your way that will just</p> <p>25 get edited out, at least he will have read</p>
<p style="text-align: right;">Page 7</p> <p>1 Deposition taken before MICHELLE PAYNE, Court</p> <p>2 Reporter and Notary Public in and for the State of</p> <p>3 Florida at Large, in the above cause.</p> <p>4 - - -</p> <p>5 THE VIDEOGRAPHER: This is the case of</p> <p>6 Jane Doe No. 2, plaintiff, versus Jeffrey</p> <p>7 Epstein, defendant. Jane Doe No. 3,</p> <p>8 plaintiff, versus Jeffrey Epstein,</p> <p>9 defendant. Jane Doe No. 4, plaintiff,</p> <p>10 versus Jeffrey Epstein, defendant. And Jane</p> <p>11 Doe No. 5, plaintiff, versus Jeffrey</p> <p>12 Epstein, defendant. Jane Doe No. 6,</p> <p>13 plaintiff, versus Jeffrey Epstein,</p> <p>14 defendant. Jane Doe No. 7, plaintiff,</p> <p>15 versus Jeffrey Epstein, defendant. CMA,</p> <p>16 plaintiff, versus Jeffrey Epstein,</p> <p>17 defendant. And Jane Doe, plaintiff, versus</p> <p>18 Jeffrey Epstein, et al, defendant. And Jane</p> <p>19 Doe -- is there a shorter thing that we can</p> <p>20 do here? It's also missing this one right</p> <p>21 here.</p> <p>22 MR. MERMELSTEIN: Do we have a problem</p> <p>23 with saying Jane Doe 2 and the Epstein and</p> <p>24 related cases?</p> <p>25 THE VIDEOGRAPHER: I'm missing this Jane</p>	<p style="text-align: right;">Page 9</p> <p>1 that caption, every caption. Right? Is</p> <p>2 there a better suggestion?</p> <p>3 MR. CRITTON: No. There may be a better</p> <p>4 suggestion if he starts this is such and</p> <p>5 such day, it's the deposition of Mr.</p> <p>6 Rodriguez in the case such and such, and we</p> <p>7 can almost fill it in depending on which</p> <p>8 tape it goes, how it fills in, at least</p> <p>9 we'll have the context of the first and</p> <p>10 depending on whether the Judge reads it in</p> <p>11 from a consolidated or they all come</p> <p>12 related, I have no great idea.</p> <p>13 MR. EDWARDS: I was thinking if he read</p> <p>14 every one of them and it was the seventh in</p> <p>15 line then you just would edit it so you</p> <p>16 would only read that one.</p> <p>17 MR. CRITTON: I'm okay with that too.</p> <p>18 THE VIDEOGRAPHER: On page number three</p> <p>19 there is something missing on the top here.</p> <p>20 Do you want me to read each case number</p> <p>21 separately?</p> <p>22 MR. MERMELSTEIN: I don't think it's</p> <p>23 necessary.</p> <p>24 MR. EDWARDS: I don't think it's</p> <p>25 necessary either.</p>

<p style="text-align: right;">Page 10</p> <p>1 THE VIDEOGRAPHER: So just go through 2 just the names. 3 MR. MERMELSTEIN: That's sufficient. And 4 there is a cross notice for one of the state 5 cases? 6 MR. LANGINO: That would be our case. 7 MR. MERMELSTEIN: So he's got that 8 notice? Off the record. 9 (Thereupon, a discussion was held off the 10 record.) 11 THE VIDEOGRAPHER: This is the case of 12 Jane Doe No. 2, plaintiff, versus Jeffrey 13 Epstein, defendant. Jane Doe No. 3, 14 plaintiff, versus Jeffrey Epstein, 15 defendant. Jane Doe No. 4, plaintiff, 16 versus Jeffrey Epstein, defendant. Jane Doe 17 No. 5, plaintiff, versus Jeffrey Epstein, 18 defendant. Jane Doe No. 6, plaintiff, 19 versus Jeffrey Epstein, defendant. Jane Doe 20 No. 7, plaintiff, versus Jeffrey Epstein, 21 defendant. CMA, plaintiff, versus Jeffrey 22 Epstein, defendant. Jane Doe, plaintiff, 23 versus Jeffrey Epstein, et al, defendant. 24 Jane Doe 3, plaintiff, versus Jeffrey 25 Epstein, et al, defendant. Jane Doe No.</p>	<p style="text-align: right;">Page 12</p> <p>1 Jeffrey Epstein. 2 MR. WILLITS: Richard Willits on behalf 3 of plaintiff C.M.A. 4 MR. EDWARDS: And Brad Edwards on behalf 5 of plaintiffs E.W. and L.M. 6 Thereupon, 7 ALFREDO RODRIGUEZ, 8 having been first duly sworn or affirmed, was 9 examined and testified as follows: 10 DIRECT EXAMINATION 11 BY MR. MERMELSTEIN: 12 Q. Can you state your full name for the 13 record, please? 14 A. My name is Alfredo Rodriguez. 15 Q. And where do you live? 16 A. I live in Kendall, 11349 Southwest 86 17 Lane, Miami, Florida 33173. 18 Q. Are you currently employed? 19 A. No. 20 Q. Okay. When was the last time you were 21 employed? 22 A. December of 2008. 23 Q. Was there a time you were employed in 24 Palm Beach, Florida? 25 A. Yes, I was.</p>
<p style="text-align: right;">Page 11</p> <p>1 101, plaintiff, versus Jeffrey Epstein, 2 defendant. Jane Doe No. 102, plaintiff, 3 versus Jeffrey Epstein defendant. B.B., 4 plaintiff, versus Jeffrey Epstein, 5 defendant. 6 This is in the Circuit Court of the 15th 7 Judicial Circuit in and for Palm Beach 8 County, Florida. 9 This is the deposition of Alfredo 10 Rodriguez. Today is July the 29th, starting 11 time -- the year 2009, starting time 12 approximately 11:16 a.m. 13 Will attorneys please state their 14 appearance? 15 MR. MERMELSTEIN: Stuart Mermelstein for 16 plaintiffs Jane Doe 2, Jane Doe 3, Jane Doe 17 4, Jane Doe 5, and Jane Doe 6, and Jane Doe 18 7. 19 MR. EDWARDS: Brad Edwards for plaintiff 20 Jane Doe. 21 MR. LANGINO: Adam Langino on behalf of 22 plaintiff, B.B. 23 MS. EZELL: Cathy Ezell on behalf of Jane 24 Doe 101 and 102. 25 MR. CRITTON: Bob Critton on behalf of</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. When was that? 2 A. I began on September of 2004. 3 Q. And where were you employed? 4 A. I work -- well, I have several employers 5 in Palm Beach. One of them was Jeffrey Epstein. 6 Q. By several employers in Palm Beach you 7 mean -- 8 A. Different employers. 9 Q. At the same time? 10 A. No, different times. From 2005 to 2006 I 11 was employed by Dana Hammond. 12 Q. Donna Hammond? 13 A. D-A-N-A, Hammond. Or Aimes is her single 14 name. Dana Aimes Hammond. 15 Q. Dana Aimes Hammond? 16 A. Yeah. 17 Q. That was in Palm Beach? 18 A. Yes. 19 Q. And in September 2004 you were employed 20 by whom? 21 A. Jeffrey Epstein. 22 Q. Did Mr. Epstein employ you as an 23 individual or through any business or corporate 24 entity? 25 A. As an individual.</p>

Page 14

1 Q. And what was your position with Jeffrey  
2 Epstein?  
3 A. I was the household manager.  
4 Q. And what does the household manager do?  
5 A. Oversees all aspects of the maintenance  
6 of the estate, payroll of the gardeners,  
7 scheduling staff and security, food, coordinating  
8 activities with the chef, and pilots, etc.  
9 Q. I'm sorry, what was the last one?  
10 A. Activities with the pilots.  
11 Q. Oh pilots.  
12 A. Yes.  
13 Q. What kind of activities do you coordinate  
14 with the pilots?  
15 A. What time Mr. Epstein will arrive, how  
16 many cars will I need and so on and so forth.  
17 Q. Was there a particular place that you  
18 were employed?  
19 A. Yeah, I was employed by 358 El Brillo  
20 Way.  
21 Q. Did you have any other duties other than  
22 what you've mentioned?  
23 A. Driving. Well, I used to prepare coffee  
24 for Mr. Epstein every morning, 6:30 in the  
25 morning. Other than that is little problems

Page 15

1 arise, you know, the maintenance, the  
2 electricians, I have to deal with the contractors  
3 on a daily basis.  
4 Q. Now, what is located at 358 El Brillo Way  
5 in Palm Beach?  
6 A. It's called the estate section of Palm  
7 Beach. It's off North Ocean Boulevard.  
8 Q. So is it a single-family residence?  
9 A. Yes, it is.  
10 Q. When you say you were a household  
11 manager, you were managing that residence?  
12 A. Yes, sir.  
13 Q. And how did you come about obtaining this  
14 position as household manager?  
15 A. Through an employment agency.  
16 Q. Do you know which employment agency it  
17 was?  
18 A. Barbara Goldberg. She has an agency  
19 called Regal Domestics.  
20 Q. Had you worked in household services  
21 before September of '04?  
22 A. Yes.  
23 Q. Did you work in Palm Beach before that?  
24 A. Long Island.  
25 Q. When did you move from Long Island?

Page 16

1 A. I moved to Florida in 1996.  
2 Q. Between 1996 and 2006 when you started to  
3 work for Mr. Epstein did you have household  
4 management jobs in that period?  
5 A. On and off, yes, in Fisher Island,  
6 Florida.  
7 Q. Fisher Island?  
8 A. Yeah.  
9 Q. I take it that Barbara Goldberg  
10 specializes in placing employees for wealthy  
11 households?  
12 A. Yes.  
13 Q. Did you know Mr. Epstein before you began  
14 to work for him?  
15 A. No.  
16 Q. Did you interview with him?  
17 A. Yes, I did.  
18 Q. And what did the interview entail?  
19 A. He asked me what I did before, and he  
20 wanted to know where my capabilities of running  
21 his estate, and what was my salary potentials, we  
22 discuss the time he was going to be in the Island,  
23 et cetera.  
24 Q. What did he tell you at that time as to  
25 the time he was going to be in the Island?

Page 17

1 A. He will say he will be traveling on and  
2 off, and like when he's in the Island he needs a  
3 lot of attention but when he's off I will be more  
4 relaxed.  
5 MR. EDWARDS: I'm sorry, Stuart, I'm  
6 missing some of this just because the noise  
7 on the other end of Richard's phone.  
8 Richard, do you have a mute or anything?  
9 MR. WILLITS: I'm sorry?  
10 MR. EDWARDS: Do you have a mute or  
11 anything? We're getting a lot of noise  
12 coming out of the phone.  
13 MR. WILLITS: I'm sorry.  
14 THE VIDEOGRAPHER: Do you want to go off  
15 the record?  
16 MR. EDWARDS: Sure.  
17 (Thereupon, a discussion was held off the  
18 record.)  
19 THE VIDEOGRAPHER: We're back on the  
20 record.  
21 BY MR. MERMELSTEIN:  
22 Q. So Mr. Epstein told you that when he  
23 wasn't there you would be more relaxed but when he  
24 was there it would be more intense, I assume?  
25 A. Yes.

5 (Pages 14 to 17)

Page 18

1 Q. And how often did he indicate he would be  
2 in Palm Beach?

3 A. He will say once a month, like two weeks  
4 out of the month, something like that. This is a  
5 long time ago so I'm trying to remember the words.

6 Q. That's all right. You can only answer to  
7 the extent that you recall the information that's  
8 asked for in the question.

9 By the way, have you had your deposition  
10 taken before?

11 A. I was subpoena by the State Attorney in  
12 Palm Beach but not here.

13 Q. Did you give a transcribed statement to  
14 the State Attorney?

15 A. I believe it was recorded. I don't know  
16 with this method but it was recorded.

17 Q. With a tape machine?

18 A. Yeah.

19 Q. Now, after you were interviewed did he  
20 give you the job on the spot or did he call you  
21 afterward?

22 A. He hired me on the spot.

23 Q. What was your salary?

24 A. 55,000.

25 Q. And when did you start to work for him?

Page 19

1 A. I believe it was the last week of August  
2 of 2004.

3 Q. Now, I take it your day to day job duties  
4 were different from when he was there to when he  
5 wasn't there. Correct?

6 A. Yes.

7 Q. Let's take a day when he's there. What  
8 would your -- what would be your routine, what  
9 would your day entail?

10 A. Well, coffee at 6:30 in the morning.  
11 Check the cars, you know, see -- he like the  
12 cabana to be in his computer, I would be sure that  
13 the cabana was clean and, you know, tidy.

14 Q. I'm sorry, what does that have to do with  
15 the computer?

16 A. He would like to work in the cabana so I  
17 would pay attention to that.

18 Q. So he would go to the computer in the  
19 cabana and you would make sure that the cabana was  
20 clean?

21 A. Yes, sir.

22 Q. So he had coffee at 6:30 a.m. Did he  
23 start working immediately after that?

24 A. Yes.

25 Q. Continue. What did you do then?

Page 20

1 A. We have guests that particular day and  
2 arrange, coordinate with the chef if I have to go  
3 buy the groceries, gas the cars. That was a  
4 routine everyday. Relay instructions to the  
5 housekeepers and the gardeners and the pool  
6 people. Arrange meals. This was done by the chef  
7 but I was trying to be sure Mr. Epstein was fed at  
8 his lunch time. And then of course through the  
9 day he will give me instructions.

10 Q. So he would give you instructions himself  
11 personally?

12 A. Secretary.

13 Q. Okay. Now, let's go through who the  
14 household staff was at the time that you started.

15 Who would you say worked under your  
16 supervision as the household manager?

17 A. It was a Filipino lady by the name of  
18 Louella. I don't recall her last name.

19 Q. Louella Rabuyo?

20 A. Yes, exactly, yes.

21 Q. What did she do?

22 A. She would be the housekeeper in charge of  
23 the laundry, cleaning the household, everything  
24 inside the house.

25 Q. And who else?

Page 21

1 A. Jerome. Jerome Pierre was the gardener.

2 Q. And he was full-time?

3 A. Full-time, yes.

4 Q. Who else?

5 A. And then we have a young lady who used to  
6 take care of the pool but I don't recall her name  
7 right now. She used to come three times a week,  
8 sometimes four times. Most every day we used to  
9 have John Cassidy air conditioner came to the  
10 house because it's hot and it's humid. What  
11 contractor that's almost on a daily basis there.

12 Q. Because there was problems with the air  
13 conditioner?

14 A. Well, the house is big, and all the house  
15 in Palm Beach need constant attention.

16 Q. Okay.

17 A. That's the full -- and the chef, David, I  
18 can't remember his last name.

19 Q. Was it Mullen?

20 A. I don't recall, sir, right now.

21 Q. Muller. But his first name was David?

22 A. David, yes.

23 Q. Was there a butler as well?

24 A. Well, I used to double as household  
25 manager slash butler.

6 (Pages 18 to 21)



Page 22

1 Q. Was there a Michael Liffman that was  
 2 hired as a butler at some point?  
 3 A. That was before me.  
 4 Q. Okay. Who was the household manager  
 5 before you?  
 6 A. I understand there were several in one  
 7 year. There was Mike Friedman, there is Joe  
 8 Alessi. There was a couple of Filipino girls --  
 9 no, they were from Bangladesh. I can't remember.  
 10 I used to send his -- I used to forward his mail  
 11 to Maryland but I can't recall right now, sir.  
 12 Q. Okay. And at the time you took the job  
 13 it was open, he didn't have anyone in that  
 14 position. Is that correct?  
 15 A. What I find is the staff from his house  
 16 in Manhattan they gave me the briefing on what he  
 17 likes and what he doesn't like. Belinda Retta  
 18 from Mrs. Maxwell, they were due to give me an  
 19 inside look because it was too much to learn in  
 20 48 hours so they were there handling the house  
 21 before me, so there were two couples.  
 22 Q. Two couples. All right. Let's walk  
 23 through that. So the first day you come to work  
 24 you're basically you received some training?  
 25 A. Exactly.

Page 23

1 Q. And tell us who provided that training?  
 2 A. Joe-Joe is his nickname but he runs Mr.  
 3 Epstein's estate in Manhattan as well as his wife.  
 4 They were very nice people telling me because you  
 5 have to understand, there is a lot of specifics,  
 6 where to park the car, here and there, if the  
 7 plane lands here you have to park the Mercedes,  
 8 you know, very specific details, and he gave me an  
 9 inside of all of that.  
 10 Q. Okay. So you would pick up Mr. Epstein  
 11 at the airport?  
 12 A. Yes.  
 13 Q. And how long did this training last?  
 14 A. Two or three days.  
 15 Q. Okay. And it was Joe-Joe and his wife?  
 16 A. Joe-Joe, yes.  
 17 Q. You don't remember the last name or full  
 18 names?  
 19 A. No, sir.  
 20 Q. Anything else you can remember that you  
 21 were told specifically regarding his preferences?  
 22 A. He likes Columbian coffee, that's the  
 23 only type of coffee he drinks, and it was shipped  
 24 from New York from Balducci's, stuff like that.  
 25 Where to buy the groceries. And he's allergic to

Page 24

1 garlic, maybe something like that, you know,  
 2 personal things.  
 3 Q. You mentioned Ms. Maxwell?  
 4 A. Yes.  
 5 Q. Who is she?  
 6 A. She was her companion.  
 7 Q. Whose companion?  
 8 A. Mr. Epstein.  
 9 Q. By companion what do you mean?  
 10 A. Well, in the beginning I assume they were  
 11 husband and wife but, you know, they were not  
 12 married, but I treated her as such. Mrs. Maxwell  
 13 was like the lady of the house.  
 14 Q. Okay. So it was your understanding they  
 15 were in a romantic relationship?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: Something like that.  
 18 BY MR. MERMELSTEIN:  
 19 Q. But they just weren't married?  
 20 A. No, sir.  
 21 Q. So you took instructions from Ms. Maxwell  
 22 as well as Mr. Epstein?  
 23 A. She gave me the instructions of how to  
 24 run the household directly. In other words, she  
 25 likes the towels, the sheets and all that so I

Page 25

1 give the instructions to Louella how to proceed  
 2 with the cleaning and the upkeep of the house.  
 3 Q. You went through the employees who worked  
 4 under you as household manager. Who would you say  
 5 was your direct supervisor, was it both  
 6 Ms. Maxwell and Mr. Epstein?  
 7 A. Mrs. Maxwell.  
 8 Q. Was your supervisor?  
 9 A. Yes, sir.  
 10 Q. I think I interrupted you. You were  
 11 going through the daily routine, and I'm not sure  
 12 you had completed going through what you would do  
 13 in a day.  
 14 A. Until noon we have all the -- we knew  
 15 that the food that was going to be served for  
 16 lunch and dinner. And then in the afternoon it  
 17 was open to shopping, maybe have to drive him to  
 18 the airport to pick up somebody, or answering the  
 19 phones.  
 20 Q. Was there a procedure or protocol for  
 21 answering the phones?  
 22 A. Yes, there was.  
 23 Q. And what was that?  
 24 A. I couldn't relay the message directly to  
 25 Mr. Epstein but take message on a piece of paper

7 (Pages 22 to 25)



Page 26

1 with a copy.  
 2 Q. Were you the only one who was allowed to  
 3 answer the phone?  
 4 A. Yes.  
 5 Q. I'm sorry, what would you do --  
 6 A. I would leave it on the counter next to  
 7 the kitchen so when I find that piece all crumbled  
 8 I knew that Mr. Epstein saw the message, so we  
 9 communicated like that.  
 10 Q. Now, you mentioned Mr. Epstein would give  
 11 you instructions during the course of the day.  
 12 A. Through his assistant.  
 13 Q. And his assistant was whom?  
 14 A. Sarah Kellen.  
 15 Q. But you didn't view her as your  
 16 supervisor?  
 17 A. She take orders from Mrs. Maxwell but she  
 18 will tell me, Alfredo, we need to buy this, we  
 19 need to do this, and so and so was coming. I  
 20 couldn't talk directly to Mr. Epstein.  
 21 Q. Okay. So any communications from Mr.  
 22 Epstein always came through Ms. Kellen?  
 23 A. Or from the office in New York. Lesley,  
 24 his secretary, or somebody else, the comptroller,  
 25 the architect, any lawyer.

Page 27

1 Q. Lawyer, what kind of instructions would  
 2 you get from lawyers?  
 3 A. We used to have a lot of time, for  
 4 instance, the dock construction, you need to have  
 5 a lot of permits in Palm Beach so they were there  
 6 for that reason.  
 7 Q. Okay. Now, so you would interact with  
 8 the staff from New York and that would include I  
 9 think you said Lesley?  
 10 A. Lesley, Bella.  
 11 Q. What was Lesley's position?  
 12 A. Lesley is the secretary, secretary to Mr.  
 13 Epstein.  
 14 Q. Okay. Is that Lesley Groff?  
 15 A. I believe it was, I don't remember the  
 16 last name.  
 17 Q. Bella, who was Bella?  
 18 A. Bella was the assistant comptroller.  
 19 Q. Anyone else that you dealt with in New  
 20 York?  
 21 A. Doug Shadow was the architect and he used  
 22 to come to the house in a regular basis because we  
 23 used to have a lot of projects going on.  
 24 Q. Okay. Would you get advance notice when  
 25 Mr. Epstein was going to arrive in Palm Beach?

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1 A. Yes. Sometimes very short notice but,  
 2 yes, I was.  
 3 Q. So that varied?  
 4 A. Yes.  
 5 Q. Who would give you that notice?  
 6 A. Mrs. Maxwell or Sarah or Larry, the  
 7 pilot.  
 8 Q. And then you would drive to pick them up  
 9 at the airport?  
 10 A. Yes.  
 11 Q. And who traveled with him?  
 12 A. The three pilots and some guests.  
 13 Q. What do you mean by guests?  
 14 A. He will have some friends from Harvard,  
 15 he will have -- well, very important people that,  
 16 you know, friends, acquaintances from New York or  
 17 Europe because I was just told the number of  
 18 people was coming on the plane.  
 19 Q. Were there people who were employed by  
 20 him who came regularly?  
 21 A. Yes.  
 22 Q. And who would they be?  
 23 A. Like I said, they were the pilots, Larry  
 24 Bisosky, George, and I don't remember the flight  
 25 engineer, and he will have two girlfriends.

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1 Q. The pilot would have two girlfriends?  
 2 A. Mr. Epstein. This is all people coming  
 3 in the plane together.  
 4 Q. Right. What do you mean by girlfriends?  
 5 A. Friends, you know, that he was always  
 6 having friends that he will befriend in New York,  
 7 I don't know, or some other places.  
 8 But I was just told -- my concern was how  
 9 many people I have to feed, how many cars do I  
 10 need to transport these people from the airport to  
 11 the house, and to arrange accommodations in the  
 12 house.  
 13 Q. What about Sarah Kellen, did she travel  
 14 with him?  
 15 A. Yes.  
 16 Q. So she was on the plane?  
 17 A. Yes.  
 18 MR. CRITTON: Form.  
 19 BY MR. MERMELSTEIN:  
 20 Q. And Ms. Maxwell?  
 21 MR. CRITTON: Form.  
 22 THE WITNESS: No, she will have different  
 23 plane.  
 24 BY MR. MERMELSTEIN:  
 25 Q. Okay.

8 (Pages 26 to 29)

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1 A. She will rent and Mr. Epstein will fly  
2 his own plane.  
3 Q. Did you also go to the airport to pick up  
4 Ms. Maxwell?  
5 A. Yes.  
6 Q. Did she travel with anyone on a regular  
7 basis when she came in?  
8 A. No.  
9 Q. She was usually alone?  
10 A. (Shakes head.)  
11 Q. Now, going back to Mr. Epstein when he  
12 traveled, these girlfriends that Mr. Epstein had,  
13 you said there were usually two?  
14 A. Two, three, you know.  
15 Q. And did you know who they were or did you  
16 ever talk to them?  
17 A. No, I never seen them before.  
18 Q. So each time he came it would be  
19 different girls?  
20 MR. CRITTON: Form.  
21 THE WITNESS: Yes, sometimes it's the  
22 same.  
23 BY MR. MERMELSTEIN:  
24 Q. Do you remember any of their names?  
25 A. No, sir.

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1 Q. And would they stay at the El Brillo Way  
2 residence until he left?  
3 A. Yes.  
4 Q. So they were given a bedroom?  
5 A. Yes.  
6 Q. Did you know how old these girls were?  
7 A. No, sir.  
8 Q. Did they appear to be young to you?  
9 MR. CRITTON: Form.  
10 THE WITNESS: They were young but, you  
11 know, I have two daughters so I believe they  
12 were over 20.  
13 BY MR. MERMELSTEIN:  
14 Q. Did you at any point get to know how Mr.  
15 Epstein came to know any of these girls?  
16 A. No, sir.  
17 Q. You had no idea?  
18 A. No.  
19 Q. And so Mr. Epstein would typically stay  
20 for two weeks or so?  
21 A. I will say that.  
22 Q. And what did these girls who came with  
23 him, what did they do during that two week period?  
24 MR. CRITTON: Form.  
25 THE WITNESS: They would go to the

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1 movies.  
2 BY MR. MERMELSTEIN:  
3 Q. Did you drive them to the movies?  
4 A. Yes. Or sometimes they would take one of  
5 the cars. Comedy clubs.  
6 Q. Comedy clubs?  
7 A. In Palm Beach, West Palm Beach.  
8 Q. What did they do in the house?  
9 A. They will be on the internet most of the  
10 time, by the pool. I think they were having a  
11 good time.  
12 Q. Could they use any of the computers in  
13 the house?  
14 A. Yes.  
15 Q. About how many computers did he have?  
16 MR. CRITTON: Form.  
17 THE WITNESS: Five or six and plus  
18 laptops, you know, more or less.  
19 BY MR. MERMELSTEIN:  
20 Q. What about Sarah Kellen, did she stay in  
21 the house during that two week period as well?  
22 A. Yes.  
23 Q. And they all had their own bedroom?  
24 A. Yes.  
25 Q. How many bedrooms were in the house?

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1 A. Master bedroom plus I think it was four  
2 extra bedrooms.  
3 Q. And when Ms. Maxwell, she would arrive at  
4 some point during this two week period?  
5 MR. CRITTON: Form.  
6 THE WITNESS: Yes.  
7 BY MR. MERMELSTEIN:  
8 Q. But she would come and leave at different  
9 times?  
10 A. Yes.  
11 Q. And where would she sleep?  
12 A. Sometimes in the master bedroom,  
13 sometimes in the yellow room.  
14 Q. Other room?  
15 A. Yellow room.  
16 Q. What's the yellow room?  
17 A. We used to give them colors because they  
18 will all have different bathrooms so we need to  
19 take care of towels and stuff like that.  
20 Q. So each of the four other bedrooms had a  
21 color?  
22 A. Yes. Blue room, yellow room, pink room,  
23 some other, I don't remember.  
24 Q. Now, were there individuals who didn't  
25 stay in the house but came to the house during the

9 (Pages 30 to 33)

<p style="text-align: right;">Page 34</p> <p>1 course of the day?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. MERMELSTEIN:</p> <p>5 Q. And who would these be?</p> <p>6 A. The architect, Doug Shadow, some lawyer</p> <p>7 like I said for some business, masseuse, sometimes</p> <p>8 we have masseuse. We have guests, you know,</p> <p>9 sometimes David Copperfield would go to the house</p> <p>10 and have dinner.</p> <p>11 Q. David Copperfield. So David Copperfield</p> <p>12 obviously is a famous person. Right?</p> <p>13 A. Yes.</p> <p>14 Q. He would stay in the house?</p> <p>15 A. No, just for the day, you know, he</p> <p>16 wouldn't stay overnight.</p> <p>17 Q. Any other famous guests you recall?</p> <p>18 A. Larry Dershowitz. Before my time I know</p> <p>19 President Clinton was in the house but --</p> <p>20 Q. You would say a masseuse would come over?</p> <p>21 A. Yes.</p> <p>22 Q. Who was the masseuse?</p> <p>23 A. Some lady that would give massage.</p> <p>24 Q. Was it a particular lady or more than</p> <p>25 one?</p>	<p style="text-align: right;">Page 36</p> <p>1 leave.</p> <p>2 Q. How far in advance would she tell you so</p> <p>3 and so is coming?</p> <p>4 A. One hour, sometimes half an hour.</p> <p>5 Q. Okay. And would she tell you the</p> <p>6 person's name or would she just say a masseuse?</p> <p>7 A. She will say Johanna is coming, so I will</p> <p>8 meet Johanna at the door and I will show her</p> <p>9 inside the house because we used to have a code to</p> <p>10 get inside the house and I would leave and go to</p> <p>11 the staff house or do my duties.</p> <p>12 Q. Is Johanna a particular name that you</p> <p>13 remember?</p> <p>14 A. Yeah, she was a very nice masseuse.</p> <p>15 Q. Would she come with her own massage</p> <p>16 table?</p> <p>17 A. No, we used to have our own.</p> <p>18 Q. Okay. So you mentioned that there was a</p> <p>19 code to get in the house?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And so --</p> <p>22 A. I will open the door for them.</p> <p>23 Q. Okay. How would they get to the house;</p> <p>24 do you recall?</p> <p>25 MR. CRITTON: Form.</p>
<p style="text-align: right;">Page 35</p> <p>1 A. They were different ones.</p> <p>2 Q. Did they have -- or did Mr. Epstein make</p> <p>3 appointments?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: Sarah did the appointments.</p> <p>6 BY MR. MERMELSTEIN:</p> <p>7 Q. Okay. So Sarah Kellen would make</p> <p>8 appointments for massages?</p> <p>9 A. Yes.</p> <p>10 Q. Was there like a schedule of appointments</p> <p>11 for the house?</p> <p>12 A. Not for the -- just for employees, we</p> <p>13 have a schedule who was working.</p> <p>14 Q. You mean -- the employees as to who would</p> <p>15 be there and who would not be there?</p> <p>16 A. Yes.</p> <p>17 Q. Were you advised as to, you know, from</p> <p>18 people coming from outside the house coming to the</p> <p>19 house what times they would be there?</p> <p>20 A. No, I didn't do that.</p> <p>21 Q. Okay. And it's your understanding that</p> <p>22 Ms. Kellen would arrange for Mr. Epstein's</p> <p>23 appointments?</p> <p>24 A. She will tell me so and so is coming, so</p> <p>25 I will open the door, greet them, and then I would</p>	<p style="text-align: right;">Page 37</p> <p>1 THE WITNESS: What do you mean?</p> <p>2 BY MR. MERMELSTEIN:</p> <p>3 Q. How would the masseuse arrive at the</p> <p>4 house?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: They drive their own car.</p> <p>7 BY MR. MERMELSTEIN:</p> <p>8 Q. Would they come in a particular entrance?</p> <p>9 A. Yes, the main entrance, that means the</p> <p>10 big gate.</p> <p>11 Q. Okay. And then you would have to enter a</p> <p>12 code for them to enter?</p> <p>13 A. I will tell them to wait at the kitchen</p> <p>14 that Sarah will get them from there.</p> <p>15 Q. And then you would leave?</p> <p>16 A. Yes.</p> <p>17 Q. I think you said there were a lot of</p> <p>18 difference masseuses?</p> <p>19 A. They have preferences but a few.</p> <p>20 MR. CRITTON: Form.</p> <p>21 BY MR. MERMELSTEIN:</p> <p>22 Q. I'm sorry. Do you remember the names of</p> <p>23 the ones he preferred?</p> <p>24 A. No, sir.</p> <p>25 Q. How often would Mr. Epstein get massages?</p>

<p style="text-align: right;">Page 38</p> <p>1 A. I would say almost on a daily basis.</p> <p>2 Q. Would he get one a day or more than one a</p> <p>3 day?</p> <p>4 A. Sometimes there were two.</p> <p>5 Q. Were there times when they were more than</p> <p>6 that?</p> <p>7 A. No, I don't think so.</p> <p>8 Q. And the routine was always the same, they</p> <p>9 come to the door, you would let them in and bring</p> <p>10 them to the kitchen?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And then Ms. Kellen would greet them?</p> <p>13 A. Yes.</p> <p>14 Q. And you always walked out?</p> <p>15 A. Yes, I would go to the staff house or I</p> <p>16 will be on my phone, you know.</p> <p>17 Q. Is the staff house a separate house?</p> <p>18 A. Yes.</p> <p>19 Q. You didn't live on the premises; did you?</p> <p>20 A. Yes, I did.</p> <p>21 Q. You lived on the premises. And so who on</p> <p>22 the staff lives on the premises?</p> <p>23 A. I was the only one.</p> <p>24 Q. Were there days you had off?</p> <p>25 A. Yes. When Mr. Epstein will leave we'll</p>	<p style="text-align: right;">Page 40</p> <p>1 drink and I will leave them.</p> <p>2 Q. Do you remember any of them telling you</p> <p>3 anything personal about themselves?</p> <p>4 A. No.</p> <p>5 Q. These were -- were these sometimes men,</p> <p>6 sometimes women?</p> <p>7 A. Women.</p> <p>8 Q. They were always women?</p> <p>9 A. Yes.</p> <p>10 Q. Did you know how old these women were?</p> <p>11 A. No, sir.</p> <p>12 Q. You mentioned before you had -- because</p> <p>13 you have a daughter. Correct? How old is your</p> <p>14 daughter?</p> <p>15 A. 20.</p> <p>16 Q. So you have a sense as to, you know --</p> <p>17 A. They were 20 something, you know.</p> <p>18 Q. You think they were 20 something, these</p> <p>19 girls who came over?</p> <p>20 A. (Shakes head.)</p> <p>21 MR. CRITTON: You need to answer out</p> <p>22 loud. Yes, no?</p> <p>23 BY MR. MERMELSTEIN:</p> <p>24 Q. You need to answer out loud, you shook</p> <p>25 your head.</p>
<p style="text-align: right;">Page 39</p> <p>1 clean the house and he will tell me, Alfredo, take</p> <p>2 the Mercedes go to Miami for the weekend or four</p> <p>3 days.</p> <p>4 Q. But that would be when he wasn't there?</p> <p>5 A. Exactly.</p> <p>6 Q. But when he was there you would always be</p> <p>7 living there in the staff house?</p> <p>8 A. Yes.</p> <p>9 Q. Where was the staff house in conjunction</p> <p>10 with the main house?</p> <p>11 A. It's adjacent right next to each other.</p> <p>12 Q. So you could enter the main house without</p> <p>13 going outside from the staff house?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. So you don't ever recall being</p> <p>16 there at the time that Sarah Kellen would greet</p> <p>17 this person in the kitchen, the masseuse?</p> <p>18 A. I was there sometimes, yes, we meet but</p> <p>19 she will take over that and I would leave the</p> <p>20 house.</p> <p>21 Q. On those occasions while you were waiting</p> <p>22 for Sarah Kellen would you ever have a</p> <p>23 conversation with the masseuse?</p> <p>24 A. Not really. I was busy to do a lot of</p> <p>25 things, I will be sure that they have something to</p>	<p style="text-align: right;">Page 41</p> <p>1 A. I'm sorry. I think they were 20 years</p> <p>2 old.</p> <p>3 Q. And what do you base that on?</p> <p>4 A. They were very tall to begin with, the</p> <p>5 way they talk, some they told me about college,</p> <p>6 something you learn past high school.</p> <p>7 Q. Some would tell you about college?</p> <p>8 A. Yes.</p> <p>9 Q. So you did have personal discussions with</p> <p>10 some of them?</p> <p>11 A. While I was driving with them they would</p> <p>12 tell me they were from Minnesota, for instance,</p> <p>13 they will tell me I want to go to this college or</p> <p>14 Miami this college.</p> <p>15 Q. So on what occasions would you have to</p> <p>16 drive with them?</p> <p>17 A. Almost on daily basis because I was doing</p> <p>18 most of the driving for them to go shopping or</p> <p>19 pick them up.</p> <p>20 Q. Okay. Now I'm a little confused. Are we</p> <p>21 talking about the girls who came with Mr. Epstein?</p> <p>22 A. Yes.</p> <p>23 Q. On the plane?</p> <p>24 A. Yes.</p> <p>25 Q. No, I'm talking about the masseuses.</p>

<p style="text-align: right;">Page 42</p> <p>1 A. No, no, I never drove them.</p> <p>2 Q. You never drove any masseuse?</p> <p>3 A. No.</p> <p>4 Q. And again, so I'm talking about the girls</p> <p>5 who would come to give massage to Mr. Epstein. Do</p> <p>6 you understand that?</p> <p>7 A. Yes, I do.</p> <p>8 Q. And these girls, you understand they</p> <p>9 would drive?</p> <p>10 A. Yes.</p> <p>11 Q. To the El Brillo house. Correct? They</p> <p>12 would enter in the front. Correct?</p> <p>13 A. Yes.</p> <p>14 Q. And you would take them to the kitchen?</p> <p>15 A. Yes, and I would leave.</p> <p>16 Q. Okay. Was there sometimes more than one</p> <p>17 girl who came at one time?</p> <p>18 A. Yes, there were two girls.</p> <p>19 Q. Okay. And why were there two girls?</p> <p>20 A. I never asked them, I don't know, sir.</p> <p>21 Q. Okay. Did both girls give Mr. Epstein a</p> <p>22 massage?</p> <p>23 MR. CRITTON: Form.</p> <p>24 THE WITNESS: I don't know, sir.</p> <p>25 BY MR. MERMELSTEIN:</p>	<p style="text-align: right;">Page 44</p> <p>1 THE WITNESS: I don't know, sir.</p> <p>2 BY MR. MERMELSTEIN:</p> <p>3 Q. Did they seem particularly young to you?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: They were attractive, sir,</p> <p>6 but, you know, it's hard to say the age.</p> <p>7 BY MR. MERMELSTEIN:</p> <p>8 Q. Okay. You said they were tall you</p> <p>9 noticed?</p> <p>10 A. Yes.</p> <p>11 Q. And they were attractive?</p> <p>12 A. Yes.</p> <p>13 Q. Do you recall the interview that you gave</p> <p>14 to the police?</p> <p>15 A. Yes, I do.</p> <p>16 Q. Do you recall that that was recorded?</p> <p>17 A. Yes.</p> <p>18 Q. Do you recall telling the police that the</p> <p>19 girls who came to the house were approximately</p> <p>20 15 years old?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: No, I don't remember that.</p> <p>23 BY MR. MERMELSTEIN:</p> <p>24 Q. You don't remember saying that?</p> <p>25 A. (Shakes head.)</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. You don't know what happened after you</p> <p>2 walked out of the kitchen?</p> <p>3 A. No.</p> <p>4 MR. CRITTON: Correct, as to what he</p> <p>5 said? I got double negative. I just want</p> <p>6 to make certain that the answer is clear.</p> <p>7 Can you read the question back?</p> <p>8 (Thereupon, a portion of the record was</p> <p>9 read by the reporter.)</p> <p>10 THE WITNESS: No.</p> <p>11 BY MR. MERMELSTEIN:</p> <p>12 Q. And with respect to these girls who came</p> <p>13 over to give massages, you don't recall having a</p> <p>14 conversation with them. Correct?</p> <p>15 A. No, sir.</p> <p>16 Q. And again, I think we're a little bit</p> <p>17 confused as to which girls we're talking about.</p> <p>18 The girls who came over for massages,</p> <p>19 what age generally did they appear to be to you?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: I don't know, sir.</p> <p>22 BY MR. MERMELSTEIN:</p> <p>23 Q. Did it appear some of these girls or all</p> <p>24 of them were high school age?</p> <p>25 MR. CRITTON: Form.</p>	<p style="text-align: right;">Page 45</p> <p>1 MR. CRITTON: Form.</p> <p>2 BY MR. MERMELSTEIN:</p> <p>3 Q. Could it be that you said that?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: I don't think so, sir. But</p> <p>6 I don't remember saying an age.</p> <p>7 BY MR. MERMELSTEIN:</p> <p>8 Q. Okay. Do you remember telling the police</p> <p>9 detective that these girls, the masseuses,</p> <p>10 appeared very young in age?</p> <p>11 MR. CRITTON: Form.</p> <p>12 THE WITNESS: I don't remember, sir.</p> <p>13 BY MR. MERMELSTEIN:</p> <p>14 Q. Did you offer them food when they were in</p> <p>15 the kitchen?</p> <p>16 A. Something to drink, yes, a glass of</p> <p>17 water.</p> <p>18 Q. Did you offer to feed them anything to</p> <p>19 eat?</p> <p>20 A. No, sir.</p> <p>21 Q. Do you remember telling the police that</p> <p>22 the girls would eat tons of cereal and drink milk</p> <p>23 all the time?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: But these are the girls</p>



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1 that were living in the house.  
 2 BY MR. MERMELSTEIN:  
 3 Q. Okay. It seems that we may be confusing  
 4 that a little bit.  
 5 Did the police ask you about both the  
 6 girls who were living in the house and the girls  
 7 who came over for massages?  
 8 A. They never specified that, sir.  
 9 Q. So what was your understanding as to what  
 10 you were telling them about?  
 11 A. The girls who living in the house.  
 12 Q. Okay. You understood that the police  
 13 were asking about the girls who were living in the  
 14 house, the girls who came with Mr. Epstein --  
 15 A. Yes.  
 16 Q. Let me finish the question.  
 17 The girls who came with Mr. Epstein on  
 18 the plane and then left with him on the plane.  
 19 Correct?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: Yes.  
 22 BY MR. MERMELSTEIN:  
 23 Q. You didn't understand that the police  
 24 were asking about the girls who came over during  
 25 the course of a particular day to give a massage

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1 to Mr. Epstein?  
 2 A. And leave, no.  
 3 Q. As we sit here today you don't remember  
 4 anything in particular about the ages of these  
 5 girls who came over?  
 6 A. No, sir.  
 7 Q. Sometimes there were two girls who came?  
 8 A. I'm sorry?  
 9 MR. CRITTON: Form.  
 10 BY MR. MERMELSTEIN:  
 11 Q. Sometimes there was two girls who came to  
 12 give a massage to Mr. Epstein?  
 13 A. Yes.  
 14 Q. Do you remember how often it was one girl  
 15 versus how often it was two girls?  
 16 A. No, sir.  
 17 Q. Were there times where one girl stayed in  
 18 the kitchen while another girl gave the massage?  
 19 A. That I don't know, sir.  
 20 Q. Okay. And that was because you left the  
 21 kitchen?  
 22 A. Yes. Like I said, I was doing my duties.  
 23 Q. Now, was it your understanding that the  
 24 massage was given upstairs?  
 25 A. Yes.

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1 Q. Who set up the massage table?  
 2 A. Sarah or some of the girls they will set  
 3 the table.  
 4 Q. So was the massage -- the massage table  
 5 was upstairs. Is that correct?  
 6 A. Yes.  
 7 Q. Okay. Where was it upstairs?  
 8 A. In the master bedroom.  
 9 Q. Was there more than one massage table?  
 10 A. Yes.  
 11 Q. Which room?  
 12 A. One on each master bath.  
 13 Q. One in each master bath?  
 14 A. Yes.  
 15 Q. There is more than one master bedroom?  
 16 A. Yes. No, no, there is one master  
 17 bedroom, two baths.  
 18 Q. Okay. I see. And so each bath had a  
 19 massage table in there?  
 20 A. Yes.  
 21 Q. And did Mr. Epstein do you know have a  
 22 preference for one massage table or another?  
 23 MR. CRITTON: Form.  
 24 THE WITNESS: I don't think so.  
 25 BY MR. MERMELSTEIN:

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1 Q. It was just he would use one of those for  
 2 the massage?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: Yes.  
 5 BY MR. MERMELSTEIN:  
 6 Q. And the masseuse would come and open the  
 7 table?  
 8 A. I don't know, sir, because I send Louella  
 9 to arrange everything, the table was in place  
 10 already so I don't know who set the table.  
 11 Q. I'm sorry, when you sent Louella?  
 12 A. When we clean the house the table was  
 13 already set so it was not neither us, the  
 14 employees, to go upstairs and set the table, the  
 15 table was already set.  
 16 Q. The table was set in position to give a  
 17 massage?  
 18 A. Yes.  
 19 Q. It was open?  
 20 A. Yes.  
 21 Q. And so it wasn't your understanding that  
 22 Louella had done it?  
 23 A. No, I don't think so.  
 24 Q. So you think it was either --  
 25 MR. CRITTON: Form.

13 (Pages 46 to 49)

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1 THE WITNESS: Somebody, yes.  
 2 BY MR. MERMELSTEIN:  
 3 Q. Okay. You don't know who did it?  
 4 A. No, sir.  
 5 Q. Okay. And what happened after the girl  
 6 completed the massage?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: Sometimes I noticed that  
 9 they leave after awhile because they didn't  
 10 tell me when they were leaving, so I was in  
 11 the staff house I was not aware what time  
 12 they leave.  
 13 BY MR. MERMELSTEIN:  
 14 Q. Sometimes you wouldn't even know that  
 15 they left?  
 16 A. Exactly.  
 17 Q. Okay. About how long were they there do  
 18 you believe?  
 19 A. One hour, two hours.  
 20 MR. CRITTON: Form.  
 21 BY MR. MERMELSTEIN:  
 22 Q. Didn't you have to be called to let them  
 23 out?  
 24 A. No.  
 25 Q. I thought there's a code on the door.

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1 A. Just to get in, to get out you go.  
 2 Q. Okay. Did you have any duties or perform  
 3 any tasks relating to cleanup after the massage?  
 4 A. Yes.  
 5 Q. And what was that?  
 6 A. We used to go with Louella and see to  
 7 replace used towels or sheets in the beds.  
 8 Q. This was after the massage?  
 9 A. Yes.  
 10 Q. Were the beds made in the morning after  
 11 Mr. Epstein woke up?  
 12 A. Yes.  
 13 Q. Okay. So would the sheets need to be  
 14 replaced after the massage?  
 15 A. We couldn't go upstairs unless he will be  
 16 out of the house. So when he leave we used to  
 17 find minutes to go upstairs and put everything  
 18 tidy again. So it was not always a routine.  
 19 Q. Okay. Well, as generally in your  
 20 routine, when would he leave during the course of  
 21 the day?  
 22 A. 10:00 a.m. I would say, go for a drive, I  
 23 don't know where they go.  
 24 Q. So he would typically go some place at  
 25 10:00 a.m.?

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1 MR. CRITTON: Form.  
 2 THE WITNESS: No, I don't remember. They  
 3 took the cars, you know.  
 4 BY MR. MERMELSTEIN:  
 5 Q. Who drove them?  
 6 A. He will drive sometimes.  
 7 Q. And you don't know where he went?  
 8 A. No, sir.  
 9 Q. And what time would he come back?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: 12, two hours.  
 12 BY MR. MERMELSTEIN:  
 13 Q. Would he leave any other time during the  
 14 day?  
 15 A. In the afternoon they will go to the  
 16 movies, early evening.  
 17 Q. So would he go with the girls who came  
 18 with him on the plane?  
 19 A. Yes, everybody together, yes.  
 20 Q. Including Ms. Kellen?  
 21 A. Yes.  
 22 Q. So about how many people total would go?  
 23 MR. CRITTON: Form.  
 24 THE WITNESS: Four or five people.  
 25 BY MR. MERMELSTEIN:

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1 Q. So Mr. Epstein, the two to three girls  
 2 who came with him in the plane. Correct?  
 3 A. I'm sorry?  
 4 Q. The two or three girls who came with him  
 5 on the plane?  
 6 A. Yes.  
 7 Q. And Ms. Kellen?  
 8 A. Yes.  
 9 Q. Anyone else?  
 10 A. No.  
 11 Q. Ms. Maxwell?  
 12 A. No.  
 13 Q. So anyplace else he would go in the car  
 14 by himself?  
 15 A. He never drove by himself.  
 16 Q. You just said sometimes he would drive.  
 17 A. Yeah, but with everybody.  
 18 Q. Okay. But he would never go just by  
 19 himself?  
 20 A. No.  
 21 Q. Okay. So either in the morning when he  
 22 went out to drive or in the afternoon when he went  
 23 to the movies that's when you and Louella would go  
 24 upstairs?  
 25 A. Exactly, sir.

14 (Pages 50 to 53)



Page 54

1 Q. Okay. And you would cleanup?  
 2 A. Yes.  
 3 Q. Again, why did the sheets need to be  
 4 replaced at that particular point in time?  
 5 A. Because they were in disarray so we need  
 6 to straighten the bed, the sheets, towels need to  
 7 be replaced.  
 8 Q. But the bed was made after Mr. Epstein  
 9 woke up?  
 10 A. Yes, it was.  
 11 MR. CRITTON: Form.  
 12 BY MR. MERMELSTEIN:  
 13 Q. Correct?  
 14 A. If he will leave the house we'll do the  
 15 bed.  
 16 Q. I see what you're saying. If he didn't  
 17 leave the house until the afternoon when he went  
 18 to the movies then the bed wouldn't be made?  
 19 A. Exactly.  
 20 Q. What else did you do when you went  
 21 upstairs?  
 22 A. We need to take a look around, the  
 23 temperature of the A/C. Mostly laundry, sir, you  
 24 know, because we used to go through a lot of  
 25 laundry, that's all.

Page 55

1 Q. Did Mr. -- strike that.  
 2 Were there sex toys anywhere in the  
 3 master bedroom?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: Yes, they were in the  
 6 master bedroom.  
 7 BY MR. MERMELSTEIN:  
 8 Q. Okay. Where were they?  
 9 A. In the armoire in front of Mr. Epstein's  
 10 bed.  
 11 Q. In front of his bed?  
 12 A. Yes.  
 13 Q. Did you ever do anything with the sex  
 14 toys?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: The things I did I cleaned  
 17 the back -- there is a vibrator to keep  
 18 massage to your back. We used to wipe them,  
 19 put them away, massage creams, put them  
 20 away, fold the table, folding the massage  
 21 table.  
 22 BY MR. MERMELSTEIN:  
 23 Q. Okay. You mentioned there was a back  
 24 massager?  
 25 A. Yes.

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1 Q. The back massager vibrated?  
 2 A. Yes.  
 3 Q. I started this questioning by asking you  
 4 about sex toys. Correct?  
 5 A. Yes. Go ahead.  
 6 Q. What were the sex toys?  
 7 A. In the armoire.  
 8 Q. Yes. Okay.  
 9 A. I never see them outside laying around.  
 10 Q. You never saw them out of the armoire?  
 11 A. I don't think so, sir.  
 12 Q. Do you remember what kind of sex toys  
 13 they were?  
 14 A. Like spouses, you know, what do you call  
 15 that? Handcuffs, or a vibrator. They called  
 16 dildos?  
 17 Q. Yes. Were there many of them?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: A few.  
 20 BY MR. MERMELSTEIN:  
 21 Q. Describe them.  
 22 A. You know, personal vibrators for women.  
 23 Q. Were they a particular color, a  
 24 particular size?  
 25 A. I don't remember, sir.

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1 Q. You remember he had a few vibrators?  
 2 A. Yes.  
 3 Q. Any other kind of toys that you can  
 4 remember?  
 5 A. No, sir.  
 6 Q. And it's your testimony here today that  
 7 they were always on the shelf?  
 8 A. Yes.  
 9 Q. You never had to do anything with them?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: Not me personal, sir, I  
 12 don't know if Louella saw them, but this is  
 13 what I did and when we went upstairs.  
 14 BY MR. MERMELSTEIN:  
 15 Q. Do you recall telling the police that  
 16 when you cleaned Mr. Epstein's bedroom after the  
 17 massages you would discover a massager, vibrators,  
 18 and sex toys scattered on the floor?  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: Yeah, what I did was the  
 21 back massager, the back rubber, this was  
 22 always on the floor.  
 23 BY MR. MERMELSTEIN:  
 24 Q. Okay. But it says sex toys.  
 25 MR. CRITTON: Form.

15 (Pages 54 to 57)

Page 58

1 THE WITNESS: I don't think so, sir.  
 2 BY MR. MERMELSTEIN:  
 3 Q. Okay. You don't recall telling that to  
 4 the --  
 5 MR. CRITTON: Form.  
 6 MR. MERMELSTEIN: Why don't we take a  
 7 break?  
 8 (Thereupon, a recess was had.)  
 9 THE VIDEOGRAPHER: We're back on the  
 10 record with tape number two.  
 11 BY MR. MERMELSTEIN:  
 12 Q. You mentioned before the break that you  
 13 would escort these girls who came to the house to  
 14 the kitchen and then typically you would leave the  
 15 kitchen and Sarah Kellen would meet them there.  
 16 A. Yes.  
 17 Q. And then to your understanding they would  
 18 provide Mr. Epstein with a massage.  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: Yes.  
 21 BY MR. MERMELSTEIN:  
 22 Q. Now, how would they get upstairs from the  
 23 kitchen?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: There was a stairwell from

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1 the kitchen.  
 2 BY MR. MERMELSTEIN:  
 3 Q. There was a stairwell from the kitchen  
 4 upstairs?  
 5 A. Yes.  
 6 Q. Okay. And were there any paintings or  
 7 drawings or artwork or photos on the stairwell?  
 8 A. Yeah, there was some art.  
 9 Q. There was art?  
 10 A. Yes.  
 11 Q. Describe the art that was on the  
 12 stairwell.  
 13 A. Pictures in black and white of places and  
 14 some girls.  
 15 Q. Okay. There were pictures of girls?  
 16 A. (Shakes head.)  
 17 Q. You have to say yes or no.  
 18 A. Yes.  
 19 Q. Were they photos or drawings?  
 20 A. Photos.  
 21 Q. Photos of girls. And they were in  
 22 frames?  
 23 A. Yes.  
 24 Q. And they were on the stairwell?  
 25 A. Yes.

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1 Q. About how many photos of girls were  
 2 there?  
 3 A. In the stairwell there were three  
 4 pictures, one from Havana, one in Mountain, and  
 5 then you have a foyer upstairs it was a big like a  
 6 beach, and then there was two girl pictures.  
 7 Q. There were two girl pictures in the  
 8 foyer?  
 9 A. Yes.  
 10 Q. As you arrive at the top of the stairs?  
 11 A. No, as you cross the foyer.  
 12 Q. Okay. Upstairs?  
 13 A. Yes.  
 14 Q. There is only two floors. Correct?  
 15 A. Yes.  
 16 Q. And describe the photos of the girls, the  
 17 two photos of the girls.  
 18 A. There was a young girl pulling her --  
 19 pulling her swimsuit a little bit showing her  
 20 fanny a little bit and the other one smiling.  
 21 Q. So neither one of them was a girl nude?  
 22 A. No.  
 23 Q. Okay. There was one girl showing what,  
 24 she had her back to the camera?  
 25 A. Yes.

Page 61

1 Q. And she was pulling down --  
 2 A. She was showing one of her cheeks let's  
 3 put it.  
 4 Q. One of her cheeks. Okay. And the other  
 5 one was a girl --  
 6 A. Smiling. You see the face but it was not  
 7 nudity there.  
 8 Q. And were there other photos of girls?  
 9 A. Yes, the only ones in that area.  
 10 Q. The only ones in that area were those  
 11 two?  
 12 A. Yes.  
 13 Q. There were no other photos of girls?  
 14 A. No.  
 15 Q. None on the staircase?  
 16 A. No.  
 17 Q. From the kitchen stairs once you arrived  
 18 in this foyer where was the master bedroom from  
 19 there?  
 20 A. To the west side of the house.  
 21 Q. So you would make a left when you got --  
 22 A. There is two stairwells to go in, one is  
 23 the main and the staircase from the kitchen would  
 24 kind of spiral down. Yeah, you have to make a  
 25 right to go to the master bedroom.

16 (Pages 58 to 61)

Page 62

1 Q. Okay. Did you pass any other bedrooms on  
2 the way to the master bedroom or was the master  
3 bedroom right there?

4 A. As soon as you leave the stairwell there  
5 was a bedroom right in front of that.

6 Q. Which bedroom was there?

7 A. That was the yellow bedroom. I can't  
8 remember, sir, but it was one -- I believe it was  
9 the yellow room.

10 Q. And then there was a master suite?

11 A. Then you have to make a right, cross the  
12 foyer to go to the master bedroom.

13 Q. Is it your understanding that the  
14 massages were always in the master bedroom?

15 A. As I understand, yes, sir.

16 Q. Were there photos of girls elsewhere in  
17 the house that you recall?

18 A. Mr. Epstein's closet.

19 Q. In his closet?

20 A. Yes.

21 Q. Were any of those photos were the girls  
22 nude or in any stage of undress?

23 A. Yes, sir.

24 Q. Okay.

25 MR. CRITTON: Object to the form on the

Page 63

1 last question.

2 BY MR. MERMELSTEIN:

3 Q. How many of those photos were there?

4 A. There was a mosaic of pictures. I don't  
5 know, it had 10, 12, 14.

6 Q. I'm sorry, a what?

7 A. Mosaic.

8 Q. Mosaic. So it was like in a single  
9 frame?

10 A. Yes.

11 Q. And there were photos of nude women in  
12 this frame?

13 A. Yes, sir.

14 Q. Okay.

15 MR. CRITTON: Form.

16 BY MR. MERMELSTEIN:

17 Q. Did you know any of the girls in those  
18 photos?

19 A. No, sir.

20 Q. Do you recall ever seeing any of them  
21 before?

22 A. No, sir.

23 Q. Did you have any impressions as to how  
24 old these girls were in the photos?

25 MR. CRITTON: Form.

Page 64

1 THE WITNESS: No, sir.

2 BY MR. MERMELSTEIN:

3 Q. Did they look young to you?

4 MR. CRITTON: Form.

5 THE WITNESS: No, sir.

6 BY MR. MERMELSTEIN:

7 Q. They did not look young?

8 A. They were young in terms of -- when you  
9 say young?

10 Q. Did they appear to be under 18 years old?

11 A. No, sir.

12 Q. Any other photos of girls in any stage of  
13 undress that you recall in the house?

14 A. There were pictures of Mr. Epstein and  
15 Mrs. Maxwell, but I mean they were adults, I mean,  
16 they were plus 45.

17 Q. No, I understand. There were nude photos  
18 of them?

19 A. Yes.

20 Q. Okay. Any nude photos of girls other  
21 than Ms. Maxwell around the house that you recall?

22 A. Yeah, the one I just mentioned.

23 Q. Other than what you've mentioned, are  
24 there any others?

25 A. No, sir.

Page 65

1 Q. You say Sarah Kellen would greet the girl  
2 in the kitchen, the girl or girls who were coming  
3 to give the massage. Correct?

4 A. Yes.

5 Q. What would she do while the massage was  
6 going on?

7 MR. CRITTON: Form.

8 THE WITNESS: I don't know, sir.

9 BY MR. MERMELSTEIN:

10 Q. Were you ever in the kitchen when the  
11 girl went upstairs?

12 A. No, sir.

13 Q. Never?

14 A. No.

15 Q. How are these girls paid for their  
16 services for giving massages?

17 A. I pay them.

18 Q. You paid them?

19 A. Yes.

20 Q. Okay. I thought before you said that you  
21 didn't necessarily see them when they left?

22 A. When Sarah told me so and so is going to  
23 get so much, so not necessarily when they leave,  
24 they will come the next day, or I leave an  
25 envelope in the kitchen.

17 (Pages 62 to 65)

Page 66

1 Q. Okay. Well, what would determine how you  
2 went about paying them?  
3 A. Sarah told me.  
4 Q. Sarah told you to leave an envelope or to  
5 pay them in person?  
6 A. Yes.  
7 Q. Okay. When would she tell you this?  
8 MR. CRITTON: Form.  
9 THE WITNESS: Sometimes in the afternoon,  
10 you know. It depends, it varies, you know,  
11 because she will call me and say so and so  
12 will get paid \$300. I never ask, you know.  
13 BY MR. MERMELSTEIN:  
14 Q. Well, how did you know whether to leave  
15 it in the kitchen or to hand it to the girl?  
16 A. She would give me the instructions.  
17 Q. She would always give you instructions as  
18 to how the payment was to be made?  
19 A. Yes.  
20 Q. Sometimes it wasn't that day?  
21 A. No, sir.  
22 Q. Okay. And because you knew the girl was  
23 coming back?  
24 A. She will probably make arrangements with  
25 Sarah because I didn't know she was coming back.

Page 67

1 Q. And how much did you know to pay?  
2 MR. CRITTON: Form.  
3 BY MR. MERMELSTEIN:  
4 Q. How much did you know to pay the girl?  
5 A. It varies, 300, 400, 500.  
6 Q. And Ms. Kellen would always instruct you  
7 as to how much it would be?  
8 A. Yes.  
9 Q. Did you write a check or how did you make  
10 the payment?  
11 A. Cash.  
12 Q. It was always cash?  
13 A. Yes.  
14 Q. Do you know why that is?  
15 A. I'm sorry?  
16 Q. Do you know why you always paid cash?  
17 A. I was supposed to have cash with me, sir,  
18 at all times. The checks were made for paying  
19 payroll so -- or purchasing items.  
20 Q. Okay. So you used checks for the payroll  
21 for the employees who were under you?  
22 A. Jerome the gardener.  
23 Q. Okay. Now, was Jerome an independent  
24 contractor or an employee?  
25 A. No, he will be under -- he was under

Page 68

1 my -- he was an employee of Mr. Epstein.  
2 Q. So he was a regular employee?  
3 A. Yes, sir.  
4 Q. So there would be like -- so he would  
5 receive a check. Correct?  
6 A. Yes.  
7 Q. And there would be withholdings from the  
8 check, etc. Right?  
9 MR. CRITTON: Form.  
10 THE WITNESS: Yes.  
11 BY MR. MERMELSTEIN:  
12 Q. But the girls who gave massages, they  
13 would just receive cash?  
14 A. Yes.  
15 Q. And how were other household expenses  
16 paid?  
17 A. Food, gas, flowers, gifts.  
18 Q. How were they paid?  
19 A. Cash or check, you know. I will buy --  
20 in a store I will pay with a check, and sometimes  
21 I will use cash or credit card, sir.  
22 Q. So you had your own credit card?  
23 A. They give me credit card, they give me  
24 the checks and they give me the cash.  
25 Q. Okay. What kind of credit card was it?

Page 69

1 A. It was like -- I don't remember, Visa,  
2 Master Card.  
3 Q. It was like -- was it a debit card or  
4 credit card?  
5 A. It was a credit and debit card.  
6 Q. It was both?  
7 A. Yes.  
8 Q. Was there an account that you had  
9 signatory authority on?  
10 A. Yes, I did.  
11 Q. And anyone else have signatory authority  
12 on this account?  
13 A. No, sir. Yeah, well, Mrs. Maxwell.  
14 Q. So there was an account with you and  
15 Ms. Maxwell had signatory authority on?  
16 A. Yes.  
17 Q. And you would pay expenses of the  
18 household from that account?  
19 A. Yes.  
20 Q. And you would write checks?  
21 A. Yes.  
22 Q. You would pay payroll from that account?  
23 A. Yes.  
24 Q. And did you have an understanding as to  
25 why the girls that gave massages were always paid

18 (Pages 66 to 69)

<p style="text-align: right;">Page 70</p> <p>1 in cash as opposed to check?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: I was told to pay them</p> <p>4 cash, sir.</p> <p>5 BY MR. MERMELSTEIN:</p> <p>6 Q. Simply you were told and didn't ask why?</p> <p>7 A. No.</p> <p>8 Q. Do you recall telling the detective who</p> <p>9 interviewed you for the police that you thought of</p> <p>10 yourself as a human ATM machine?</p> <p>11 MR. CRITTON: Form.</p> <p>12 THE WITNESS: Yes.</p> <p>13 BY MR. MERMELSTEIN:</p> <p>14 Q. You recall saying that?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Because I always had cash</p> <p>17 in my pocket.</p> <p>18 BY MR. MERMELSTEIN:</p> <p>19 Q. And why was there always cash in your</p> <p>20 pocket?</p> <p>21 A. That was part of my job to have, you</p> <p>22 know, for emergencies or paying somebody cash.</p> <p>23 Q. Okay. What kind of emergencies?</p> <p>24 A. It's hard to say. I was supposed to put</p> <p>25 cash on each Mercedes Benz on each ashtray. The</p>	<p style="text-align: right;">Page 72</p> <p>1 A. Not him. I will drive anybody else but</p> <p>2 he would rather eat at home.</p> <p>3 Q. So you would drive house guests to</p> <p>4 restaurants?</p> <p>5 A. Yes.</p> <p>6 Q. And when you did that you would -- didn't</p> <p>7 you stay with the car or did you eat with them?</p> <p>8 A. No, I will stay with the car.</p> <p>9 Q. So who did you tip?</p> <p>10 A. If you want to park in front of the</p> <p>11 restaurant you got to tip the valet otherwise</p> <p>12 you're taking one of the spots.</p> <p>13 Sometimes I used to take -- I'm sorry.</p> <p>14 Aviation, you know, you need to go to aviation and</p> <p>15 help those guys move your cars around, you need --</p> <p>16 they carry luggage, so I used to tip those too.</p> <p>17 Q. That would be when you picked up or</p> <p>18 dropped off Mr. Epstein. Correct?</p> <p>19 A. Yes.</p> <p>20 MR. MERMELSTEIN: We'll mark this as an</p> <p>21 exhibit, composite exhibit.</p> <p>22 (Composite Exhibit 1 was marked for</p> <p>23 Identification.)</p> <p>24 MR. CRITTON: Just out of curiosity, on</p> <p>25 depositions are we going to use instead of</p>
<p style="text-align: right;">Page 71</p> <p>1 idea behind this is you get stranded nobody accept</p> <p>2 credit card or check you have cash.</p> <p>3 Q. How much did you leave in the ashtray?</p> <p>4 A. 300.</p> <p>5 Q. And did you ever have to replenish that</p> <p>6 money?</p> <p>7 A. Yes.</p> <p>8 Q. Because the Mercedes was stranded?</p> <p>9 A. No, because when Mr. Epstein will leave I</p> <p>10 have to collect that money because I will send the</p> <p>11 cars to the car wash so to avoid that money being</p> <p>12 stolen we used to keep track, you know, when to</p> <p>13 retrieve that money and then when he's coming put</p> <p>14 it back there again.</p> <p>15 Q. So you use cash for that purpose and you</p> <p>16 also use cash to pay the masseuses. Correct?</p> <p>17 A. Yes.</p> <p>18 Q. Did you use cash for any other purpose?</p> <p>19 A. Car wash for the guy who used to come to</p> <p>20 the house and wash all the cars. Tipping</p> <p>21 sometimes for getting a good spot in the</p> <p>22 restaurant you have to have cash, something like</p> <p>23 that.</p> <p>24 Q. Okay. Would you drive Mr. Epstein to a</p> <p>25 restaurant?</p>	<p style="text-align: right;">Page 73</p> <p>1 doing plaintiff and defendant designations</p> <p>2 do you just want to run them one, two,</p> <p>3 three, four?</p> <p>4 MR. MERMELSTEIN: That's fine with me as</p> <p>5 long as we remember where we left off.</p> <p>6 MR. CRITTON: Well, are we going to do it</p> <p>7 consecutive with all of the depositions?</p> <p>8 I'm okay with that if someone can keep track</p> <p>9 of that.</p> <p>10 MR. EDWARDS: I've had that go wrong</p> <p>11 before, especially when we have some parties</p> <p>12 who aren't here, such as Mr. Garcia, he's</p> <p>13 going to join depositions, we have to start</p> <p>14 at 27 or whatever.</p> <p>15 MR. CRITTON: For each deposition one</p> <p>16 through whatever without necessarily giving</p> <p>17 them a plaintiff or defendant.</p> <p>18 BY MR. MERMELSTEIN:</p> <p>19 Q. Mr. Rodriguez, I've marked as Exhibit 1 a</p> <p>20 composite document which includes four per page of</p> <p>21 what appear to be message slips.</p> <p>22 First of all let me ask you, let me</p> <p>23 direct your attention to the first page of this</p> <p>24 exhibit. And the upper left message has initials</p> <p>25 at the bottom. Is that correct?</p>



<p style="text-align: right;">Page 74</p> <p>1 A. Yes.</p> <p>2 Q. Are those your initials?</p> <p>3 A. Yes.</p> <p>4 Q. And was it the household policy to</p> <p>5 initial messages when they were taken?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. You were instructed to do that?</p> <p>8 A. Yes.</p> <p>9 Q. Who instructed you to do that?</p> <p>10 A. Ms. Maxwell. There was a manual, sir, in</p> <p>11 the house, we had to follow the instructions of</p> <p>12 the manual.</p> <p>13 Q. There was -- okay.</p> <p>14 A. Estate manager, household manager for all</p> <p>15 the houses, so I will abide to that, you know, so</p> <p>16 I take message with my initial, the time, who</p> <p>17 called.</p> <p>18 Q. So there were all sorts of policies and</p> <p>19 procedures in this manual?</p> <p>20 A. Yes.</p> <p>21 Q. Who wrote it?</p> <p>22 A. It was the estate manager for all the</p> <p>23 properties and so I was --</p> <p>24 Q. Who was the estate manager for all the</p> <p>25 properties?</p>	<p style="text-align: right;">Page 76</p> <p>1 and he told you he owned a modeling agency?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Anything else he told you?</p> <p>4 A. He spoke, you know, five, six languages,</p> <p>5 always speaking Spanish, Italian.</p> <p>6 Q. Did the girls who were -- you know, who</p> <p>7 travelled with Mr. Epstein, were they from his</p> <p>8 agency?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: I don't know, sir.</p> <p>11 BY MR. MERMELSTEIN:</p> <p>12 Q. You didn't discuss that?</p> <p>13 A. No.</p> <p>14 Q. Let's look at the message next to it.</p> <p>15 MR. CRITTON: Still on page one?</p> <p>16 MR. MERMELSTEIN: Still on page one.</p> <p>17 BY MR. MERMELSTEIN:</p> <p>18 Q. It appears the one under it is to the</p> <p>19 same person. Is that correct? Who is that?</p> <p>20 A. Alicia.</p> <p>21 Q. Who is Alicia?</p> <p>22 A. I don't know, sir. Please tell Jeffrey</p> <p>23 that I called so I just wrote the name.</p> <p>24 Q. Now, some of these messages if you look</p> <p>25 through appears to be a different handwriting and</p>
<p style="text-align: right;">Page 75</p> <p>1 A. I never met him, sir, he was fired before</p> <p>2 I came along.</p> <p>3 Q. But you don't remember his name?</p> <p>4 A. No, sir.</p> <p>5 Q. And you remember one of the things that</p> <p>6 said in this manual was that every message has to</p> <p>7 be signed?</p> <p>8 A. Yes.</p> <p>9 Q. I'm not necessarily going to go through</p> <p>10 every single message. Let me go back to the one</p> <p>11 on the upper left on the first page. It's from</p> <p>12 Jean-Luc. Is that correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Who is Jean-Luc?</p> <p>15 A. He had modeling agency.</p> <p>16 Q. How do you know that?</p> <p>17 A. He gave me his card, sir.</p> <p>18 Q. Was he a frequent guest at the house?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Did he stay over?</p> <p>21 A. Sometimes he will stay, sometimes I will</p> <p>22 drive him to Miami.</p> <p>23 Q. Do you recall his last name?</p> <p>24 A. No, sir.</p> <p>25 Q. And so you had a conversation with him</p>	<p style="text-align: right;">Page 77</p> <p>1 there is no signature on the bottom.</p> <p>2 A. That's not mine, I don't know who's that</p> <p>3 is, sir.</p> <p>4 Q. I thought you said earlier you were the</p> <p>5 one who was responsible for taking messages.</p> <p>6 A. Exactly, yes, I was, sir.</p> <p>7 Q. But there were other people who took</p> <p>8 messages as well?</p> <p>9 A. Maybe this is after or before my time,</p> <p>10 sir.</p> <p>11 Q. Okay. Because there is no date on it.</p> <p>12 A. I used to put my dates and I know I used</p> <p>13 to do that all the time, but you know.</p> <p>14 Q. These style of message pads. It was a</p> <p>15 pad. Correct?</p> <p>16 A. Yes.</p> <p>17 Q. And this is the old fashion message pad</p> <p>18 that it's like duplicate?</p> <p>19 A. Exactly, the original stays with the</p> <p>20 spiral.</p> <p>21 Q. Okay. So there was a spiral notebook?</p> <p>22 A. Exactly.</p> <p>23 Q. And you would write the message on the</p> <p>24 top copy and then you would take that out and put</p> <p>25 it on the counter in the kitchen?</p>

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1 A. Yes, sir.  
 2 Q. And Mr. Epstein knew to look there for  
 3 his messages. Correct?  
 4 A. Yes, sir.  
 5 Q. Then there was a carbon copy that was  
 6 with -- that remained with the spiral notebook.  
 7 Correct?  
 8 A. Yes.  
 9 Q. Now, if you look at the way this is  
 10 copied it appears to be that this was taken from  
 11 the spiral notebook. Is that fair to say?  
 12 A. Yes, sir.  
 13 Q. Okay. So it would appear that, for  
 14 example, that these ones that aren't dated are on  
 15 the same pages as the ones that are dated. Is  
 16 that fair to say?  
 17 A. Yes, sir.  
 18 MR. CRITTON: Form.  
 19 BY MR. MERMELSTEIN:  
 20 Q. Does that help at all as to who may have  
 21 been the one to take these other messages?  
 22 A. I don't know, sir, I don't know.  
 23 Q. But it's your understanding that no one  
 24 else other than you took messages?  
 25 A. Exactly.

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1 Q. There is a fairly distinctive AR  
 2 signature on many of these message slips. And  
 3 that's your signature. Correct?  
 4 A. Yes, it is.  
 5 Q. Let me direct your attention to a message  
 6 that was taken on November 8, 2004.  
 7 MR. CRITTON: I think that's page nine.  
 8 I just numbered mine.  
 9 MR. MERMELSTEIN: It is page nine,  
 10 correct.  
 11 MS. EZELL: What was the date again?  
 12 MR. MERMELSTEIN: November 8, 2004.  
 13 BY MR. MERMELSTEIN:  
 14 Q. Now, it appears that there is information  
 15 that was redacted from here, meaning that it was  
 16 whited out or blacked out, one or the other. Do  
 17 you see that?  
 18 A. On the right.  
 19 Q. Because you would have written down a  
 20 name and phone number. Correct?  
 21 A. Yes.  
 22 Q. And the message is, quote, "I have a  
 23 female for him."  
 24 A. Yes.  
 25 Q. Do you remember this message?

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1 A. Probably so, sir.  
 2 Q. Okay. Tell me what this was about.  
 3 A. Probably so, sir.  
 4 MS. EZELL: What was that answer?  
 5 MR. CRITTON: He said probably so.  
 6 THE WITNESS: Maybe C.  
 7 BY MR. MERMELSTEIN:  
 8 Q. C. So you think that -- would that be  
 9 C.W.?  
 10 A. I didn't know the last name, sir.  
 11 Q. Who is C.?  
 12 A. C. was a masseuse.  
 13 Q. Okay. She was one of the masseuses who  
 14 would come to the house?  
 15 A. Yes.  
 16 Q. I thought you didn't know any of the  
 17 names.  
 18 A. I remember Johanna. There is so many  
 19 names, sir, this is 2004.  
 20 Q. You remember Johanna. I understand. You  
 21 remember C.?  
 22 A. Yes.  
 23 Q. Do you remember any others?  
 24 A. No, sir.  
 25 MR. CRITTON: Can I ask, did you all blot

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1 it out or redact it?  
 2 MR. EDWARDS: The State Attorney's  
 3 office.  
 4 MR. MERMELSTEIN: We did not redact it.  
 5 THE WITNESS: For the record, I can make  
 6 it out because I know my writing that's why  
 7 I remember the name.  
 8 BY MR. MERMELSTEIN:  
 9 Q. I see. From what we can see here it  
 10 appears to be C.?  
 11 A. Yeah.  
 12 Q. I see. The message, I have a female for  
 13 him, what was that, what was that about?  
 14 A. They tell me that message. I never ask  
 15 them, I never inquired. I mean, I never -- I took  
 16 the messages literally and I write it down, that's  
 17 why I put quotations.  
 18 My job, sir, was to take messages and who  
 19 are you, last names, or, you know, it was never in  
 20 my job descriptions to, you know, if they accept  
 21 the message then they will give me further  
 22 instructions.  
 23 Q. So your feeling was it's none of your  
 24 business what this message means. Is that what  
 25 you're saying?

21 (Pages 78 to 81)



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1 A. Something like that, sir.  
 2 Q. Did you have an understanding as to what  
 3 she meant?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: Yes.  
 6 BY MR. MERMELSTEIN:  
 7 Q. What was that?  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: That she had a female.  
 10 It's self-explanatory.  
 11 BY MR. MERMELSTEIN:  
 12 Q. Female for what?  
 13 A. I don't know, sir. Maybe a massage,  
 14 maybe to go out as his companion.  
 15 MR. CRITTON: Form, and move to strike  
 16 the answer as speculation.  
 17 BY MR. MERMELSTEIN:  
 18 Q. And the 561 area code is Palm Beach.  
 19 Correct?  
 20 A. Yes.  
 21 Q. Was C. there often to your recollection?  
 22 A. I don't think so, sir.  
 23 Q. You don't remember her coming over to the  
 24 house?  
 25 A. No, not in the house.

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1 Q. Let me direct you to page 11, two pages  
 2 in.  
 3 A. Where do you see the page number?  
 4 Q. Just go down two pages. I'm just  
 5 counting in my head.  
 6 Now, other than the message on the upper  
 7 left, that's your signature at the bottom.  
 8 Correct?  
 9 A. Yes.  
 10 Q. Did you take these other messages?  
 11 A. No.  
 12 Q. Now, was there a different system or  
 13 protocol at night?  
 14 A. No, it's the same.  
 15 Q. So if you were in the staff house would  
 16 the phone ring in there and you would pick it up  
 17 in there?  
 18 A. Yes, I will take the information and  
 19 transfer to this, this was in the main house.  
 20 Q. Okay. But the phone would ring in the  
 21 staff house?  
 22 A. Yes.  
 23 Q. So as we sit here today you have no  
 24 explanation as to why someone else is writing down  
 25 messages on this pad?

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1 A. No.  
 2 Q. Let me direct your attention to page 13.  
 3 MR. CRITTON: When you reference a page  
 4 you may want to tell him what the message is  
 5 and the date, if he's got it, that's fine.  
 6 MR. EDWARDS: It needs to be cleaner on  
 7 the record anyway.  
 8 BY MR. MERMELSTEIN:  
 9 Q. There is a message on the upper left  
 10 dated November 20, 2004.  
 11 A. Yes.  
 12 Q. That's a message that you took. Correct?  
 13 A. Yes, sir.  
 14 Q. Ms. B. Do you recall who that is?  
 15 A. No, sir.  
 16 Q. You have no recollection?  
 17 A. No.  
 18 Q. That was the message you took for Sarah?  
 19 A. Yes.  
 20 Q. It was your understanding that Sarah made  
 21 the appointments for the massages?  
 22 A. Yes.  
 23 MR. CRITTON: Form.  
 24 BY MR. MERMELSTEIN:  
 25 Q. Let me direct your attention to a message

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1 dated 12/4/04.  
 2 MR. CRITTON: Page 15.  
 3 BY MR. MERMELSTEIN:  
 4 Q. On the bottom right that's your  
 5 signature. Correct?  
 6 A. Yes.  
 7 Q. And Johanna is the name?  
 8 A. Yes.  
 9 Q. And is that the same Johanna you  
 10 testified to earlier was the one you remember?  
 11 A. Yes, I believe so, sir.  
 12 Q. Can you describe Johanna for us?  
 13 A. Johanna, she was -- I remember she was  
 14 pregnant at the time, so very sweet lady, she live  
 15 in West Palm Beach, always talkative.  
 16 Q. What kind of things did you talk about?  
 17 A. How are you doing and everything, but  
 18 cheerful person, you know, nothing specific, but  
 19 she will always greet me cheerfully, nice person  
 20 to be around.  
 21 Q. Did she go to school, did she have  
 22 another job?  
 23 A. I think she was a professional masseuse.  
 24 Q. Now, it was your understanding that  
 25 generally the girls who came to the house for

22 (Pages 82 to 85)

<p style="text-align: right;">Page 86</p> <p>1 messages were not professional masseuses. Is that 2 correct?</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: I don't know, sir.</p> <p>5 BY MR. MERMELSTEIN:</p> <p>6 Q. How do you know Johanna was a 7 professional?</p> <p>8 A. She tell me all the time that she was 9 coming from another work so she -- or she will 10 mention that I have to leave because I have to be 11 in another place.</p> <p>12 Q. Okay. But you mentioned that she was a 13 professional masseuse, that indicated to me that 14 your understanding was that the others may not 15 have been professional masseuses.</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: I think she was more busy 18 than the others giving masseuse -- massage.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. Again, why do you say that the others 21 were not busy giving massages?</p> <p>22 A. They didn't have the scheduled 23 appointments like Johanna did.</p> <p>24 Q. How do you know that?</p> <p>25 A. Johanna was always -- let's say I need to</p>	<p style="text-align: right;">Page 88</p> <p>1 A. Correct.</p> <p>2 Q. Do you recall who Lesley Wexner is?</p> <p>3 A. He's the owner of Victor Secret, the 4 Limited.</p> <p>5 Q. Okay. What was his association with Mr. 6 Epstein?</p> <p>7 A. He was Mr. Epstein's boss.</p> <p>8 Q. He was Mr. Epstein's boss?</p> <p>9 A. Yes.</p> <p>10 Q. How did you know that?</p> <p>11 A. I think it's public domain through 12 internet I did my research who he was.</p> <p>13 Q. Okay. Before you went to work for Mr. 14 Epstein you did your research of who he was?</p> <p>15 A. No.</p> <p>16 Q. At what point did you do your research?</p> <p>17 A. During working you get curious so you 18 went to Google the name and it's there.</p> <p>19 Q. So you would Google the names --</p> <p>20 A. Lesley Wexner.</p> <p>21 Q. In other words, you Google names 22 generally of --</p> <p>23 A. No, not necessarily, not all the time, 24 but he used to call all the time and so I want to 25 know who this gentleman was.</p>
<p style="text-align: right;">Page 87</p> <p>1 leave by five, and she will leave at five. Like I 2 mentioned, she was, you know, probably she was 3 going to have a kid in two months or something 4 like that because she was like --</p> <p>5 Q. How do you know the other girls didn't 6 have appointments of that nature?</p> <p>7 A. They seemed more relaxed, sir.</p> <p>8 Q. Go to the message dated December 7, 2004. 9 Do you see that on the upper left?</p> <p>10 A. Yes.</p> <p>11 MR. CRITTON: That's page 17.</p> <p>12 MR. MERMELSTEIN: Thank you.</p> <p>13 MR. CRITTON: Who is it just so I know 14 because there is others December 7th?</p> <p>15 MR. MERMELSTEIN: I'm sorry, N.</p> <p>16 MR. CRITTON: That's page 18.</p> <p>17 BY MR. MERMELSTEIN:</p> <p>18 Q. You took that message. Correct?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recall who N. is?</p> <p>21 A. No, I don't remember, sir.</p> <p>22 Q. And the message next to it is Lesley 23 Wexner. Is that correct?</p> <p>24 A. Yes.</p> <p>25 Q. And that's your signature as well?</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Did you Google Jean-Luc?</p> <p>2 A. No.</p> <p>3 Q. Okay. You talked to him that's --</p> <p>4 A. It never occurred to me, sir.</p> <p>5 Q. Who else do you recall Googling?</p> <p>6 A. Prince of -- Prince Andrew, or Barak, the 7 Prime Minister of Israel because he used to call. 8 Donald Trump.</p> <p>9 Q. Go to the next page, there is a message 10 dated December 9th from Ms. Svetlana.</p> <p>11 A. Yes.</p> <p>12 Q. Who is that?</p> <p>13 A. I don't know.</p> <p>14 Q. You don't recall?</p> <p>15 A. No.</p> <p>16 Q. Do you recall a masseuse by the name of 17 Svetlana?</p> <p>18 A. I don't recall that, sir, I don't 19 remember.</p> <p>20 Q. You look at the next page there is a 21 message on the upper left corner with the name 22 redacted again. Do you see that?</p> <p>23 A. Yes, sir.</p> <p>24 Q. That's a message you took?</p> <p>25 A. Yes.</p>

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1 Q. Is that C. again?  
 2 A. It looks like it is, sir.  
 3 Q. So that was a message from C.?  
 4 A. Yes.  
 5 Q. You don't recall what she was calling  
 6 about on December 15, 2004?  
 7 A. No, sir.  
 8 Q. If you look at a message dated January 8,  
 9 2005.  
 10 MR. CRITTON: In the upper left hand  
 11 corner?  
 12 MR. MERMELSTEIN: Yes.  
 13 MR. CRITTON: I think it's page 25.  
 14 MR. MERMELSTEIN: Right.  
 15 BY MR. MERMELSTEIN:  
 16 Q. Ms. Amya?  
 17 A. Yes.  
 18 Q. Who is that?  
 19 A. A friend and acquaintance, sir.  
 20 Q. The message next to it is from Nadia.  
 21 A. Yes.  
 22 Q. Who is Nadia?  
 23 A. Mr. Epstein girlfriend.  
 24 Q. Okay. Nadia Marcenacova?  
 25 A. Yes.

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1 Q. And when you say girlfriend, what do you  
 2 mean by that?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: She used to be more times  
 5 than the other girls with her -- with him.  
 6 BY MR. MERMELSTEIN:  
 7 Q. Would she arrive on a plane with Mr.  
 8 Epstein?  
 9 A. Yeah.  
 10 Q. And the time that you worked for Mr.  
 11 Epstein how often was Nadia with him?  
 12 A. Half the time I would say.  
 13 Q. Did you ever have a discussion with her  
 14 or talk to her about personal matters?  
 15 A. No.  
 16 Q. Did she have any duties or functions at  
 17 the house?  
 18 A. For awhile she was like a coordinator or  
 19 assistant or something.  
 20 Q. What did she coordinate?  
 21 A. Phone calls.  
 22 Q. Would she take messages like you would?  
 23 A. Yeah, sometimes.  
 24 Q. Okay. So again, I'm a little confused.  
 25 So she was authorized to take -- to give messages

Page 92

1 as well?  
 2 A. What happened, she being too close to Mr.  
 3 Epstein she will -- it's no big deal to take a  
 4 message, but I mean, I was the only one who  
 5 supposed to take message, but I don't know, for  
 6 instance, who took this message, who wrote it, I  
 7 don't know.  
 8 Q. You're referring to the message from  
 9 Nadia?  
 10 A. Nadia, yes.  
 11 Q. So I'm trying to understand when you said  
 12 that she was a coordinator.  
 13 A. She will give me sometimes orders, like  
 14 Alfredo, can you give me ice cream, or send me to  
 15 the store, or buy some clothes.  
 16 Q. Okay. Did the other girls who would fly  
 17 with Mr. Epstein and stay in the house, would they  
 18 give you orders as well?  
 19 A. No.  
 20 Q. Okay. But it was your understanding that  
 21 she was -- that you were supposed to follow her  
 22 orders. Correct?  
 23 A. I knew it was coming from the boss.  
 24 Q. Okay. And how did you know that?  
 25 A. Because she told me.

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1 Q. Okay.  
 2 A. Mr. Epstein says he wants you to do this.  
 3 I didn't contest that so I will do that.  
 4 Q. Okay. Did she have her own bedroom or  
 5 did she sleep in the master bedroom?  
 6 A. She used to have her own bedroom.  
 7 Q. Okay. I'm not sure what page this is but  
 8 there is a message dated January 11, 2005. Do you  
 9 see that?  
 10 A. Yes.  
 11 Q. That's your signature. Correct?  
 12 A. Yes, sir.  
 13 Q. From Cecilia, the New York office.  
 14 A. Yes.  
 15 Q. Who is that?  
 16 A. Cecilia is another secretary, she works  
 17 in the New York office.  
 18 Q. Would you have any contact or interaction  
 19 with Cecilia?  
 20 A. She used to call me sometimes when Lesley  
 21 was not available.  
 22 Q. Okay. And so it was your understanding  
 23 she worked under Lesley?  
 24 A. Yes.  
 25 Q. What was her last name?

24 (Pages 90 to 93)

<p style="text-align: right;">Page 94</p> <p>1 A. I don't remember, sir.</p> <p>2 Q. The next page is a message in the upper</p> <p>3 left dated January 13, 2005, from C.W. Correct?</p> <p>4 A. Yes.</p> <p>5 Q. That's the same C. that we've been</p> <p>6 talking about. Correct?</p> <p>7 A. Yes.</p> <p>8 Q. That was at 7:30 p.m. Correct?</p> <p>9 A. Yes.</p> <p>10 Q. And you don't recall what that particular</p> <p>11 call was about. Right?</p> <p>12 A. No, sir.</p> <p>13 Q. The message dated January 20, 2005, from</p> <p>14 Maria. Do you see that on the bottom right?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know who that is?</p> <p>17 A. I think I have a different page.</p> <p>18 Q. You're a little ahead of me. January 20,</p> <p>19 2005.</p> <p>20 MR. CRITTON: I think that's page 31.</p> <p>21 THE WITNESS: I don't remember who she</p> <p>22 was, sir.</p> <p>23 BY MR. MERMELSTEIN:</p> <p>24 Q. You don't recall what that message was</p> <p>25 about?</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. Okay. Do you recall on any occasion who</p> <p>2 would travel with him to the Virgin Islands?</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: No, sir.</p> <p>5 BY MR. MERMELSTEIN:</p> <p>6 Q. I think we were talking about the money</p> <p>7 before, the household account, sometimes you gave</p> <p>8 gifts?</p> <p>9 A. Yes, I was told to buy some gifts.</p> <p>10 Q. For whom?</p> <p>11 A. For the guests.</p> <p>12 Q. Okay. And what kind of gifts?</p> <p>13 A. Shoes, sweaters, clothes.</p> <p>14 Q. So were you instructed to buy something</p> <p>15 in particular at a particular store?</p> <p>16 A. They would go to the store, if they like</p> <p>17 something I will go after and pay them and</p> <p>18 retrieve it.</p> <p>19 Q. Okay. So would this be a girl who was</p> <p>20 staying at the house?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. This was one of the girls who</p> <p>23 travelled with Mr. Epstein to Palm Beach.</p> <p>24 Correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 95</p> <p>1 A. No, sir.</p> <p>2 Q. What about the next page there is a</p> <p>3 message that Eva called?</p> <p>4 A. Yes.</p> <p>5 Q. Dated January 21, 2005?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know who Eva is?</p> <p>8 A. Yes.</p> <p>9 Q. Who is Eva?</p> <p>10 A. The assistant comptroller from the New</p> <p>11 York office.</p> <p>12 Q. Do you remember her last name?</p> <p>13 A. Polish last name I guess. She was</p> <p>14 Russian. She is Russian actually.</p> <p>15 Q. Did you ever travel to any other</p> <p>16 residences that Mr. Epstein had?</p> <p>17 A. No.</p> <p>18 Q. Are you aware he had a residence in the</p> <p>19 Virgin Islands?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. MERMELSTEIN:</p> <p>23 Q. And would he sometimes travel to that</p> <p>24 residence from Palm Beach?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. And so Mr. Epstein would instruct you to</p> <p>2 go shopping with this girl?</p> <p>3 A. Yes.</p> <p>4 Q. And instructed you to pay for whatever it</p> <p>5 is she wanted to buy?</p> <p>6 A. Yes.</p> <p>7 Q. Was there a price limit or anything of</p> <p>8 that nature?</p> <p>9 A. No, sir.</p> <p>10 Q. So when the girl decided what she wanted</p> <p>11 you would --</p> <p>12 A. I would write them a check.</p> <p>13 Q. In that instance you would pay by check?</p> <p>14 A. Yes.</p> <p>15 Q. Any other instances where you gave gifts</p> <p>16 to girls at the instruction of Mr. Epstein?</p> <p>17 A. No. I was just told, you know, when they</p> <p>18 told me I will buy the item.</p> <p>19 Q. I'm sorry?</p> <p>20 A. You know, when I was told to purchase</p> <p>21 this item for them, you know, I will do that, but</p> <p>22 not on any other occasions.</p> <p>23 Q. What do you mean not in any locations?</p> <p>24 A. Any other occasions.</p> <p>25 Q. Not any other occasions. Okay. Did you</p>

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1 ever buy flowers for a girl?  
 2 A. Yes, sir.  
 3 Q. Tell me about that.  
 4 A. I was told to buy flowers and roses for a  
 5 girl performing in high school.  
 6 Q. Which girl was that?  
 7 A. I don't remember the name, sir.  
 8 Q. What was Mr. Epstein's relationship to  
 9 this girl?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: I think she was an  
 12 acquaintance, friend.  
 13 BY MR. MERMELSTEIN:  
 14 Q. She was a friend?  
 15 A. Yes, sir.  
 16 Q. Now, she was performing at the high  
 17 school in what capacity?  
 18 A. There was like a -- like a play in the  
 19 graduation for high school.  
 20 Q. A play for graduation?  
 21 A. Yes, in the high school theatre there was  
 22 some kind of performance.  
 23 Q. Was it like a theatre production?  
 24 A. Yeah, something like that. I didn't go  
 25 inside so I didn't know what was going on inside.

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1 Q. Why do you say it was for graduation?  
 2 A. Because everybody was the graduation  
 3 outside, there were parents, there were a lot of  
 4 people at the school.  
 5 Q. Okay. A lot of high schools have theatre  
 6 production companies and they put on plays.  
 7 Correct?  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: It was towards the end of  
 10 the year. Well, I think I overheard that  
 11 there was a graduation performance of some  
 12 kind.  
 13 BY MR. MERMELSTEIN:  
 14 Q. But you didn't go in so you don't know?  
 15 A. No, sir.  
 16 Q. But this was a high school student you  
 17 were bringing the flowers to. Is that correct?  
 18 A. Yes.  
 19 Q. Had you seen this girl before at the El  
 20 Brillo Way property?  
 21 A. Yes, sir.  
 22 Q. You had seen her a number of times?  
 23 A. Yes, sir.  
 24 Q. Do you recall her name?  
 25 A. I don't remember her name, sir.

Page 100

1 Q. Now, you said you never went inside the  
 2 theatre?  
 3 A. No, sir.  
 4 Q. Okay. How did you get to the flower  
 5 store?  
 6 A. I called the girl to her cell and she  
 7 will come to the back door and I give her the  
 8 flowers.  
 9 Q. Was anyone else around at the time?  
 10 A. No, sir.  
 11 Q. And you mentioned this was a girl you had  
 12 seen before?  
 13 A. Yes.  
 14 Q. Was this girl who had come to give  
 15 massages to Mr. Epstein?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: I don't know if she was  
 18 doing massages but she was at the house.  
 19 BY MR. MERMELSTEIN:  
 20 Q. What would she have been there for?  
 21 A. To visit him.  
 22 Q. This was a high school girl who was  
 23 coming to visit Mr. Epstein at the house?  
 24 A. She came to the house, I open the door  
 25 and I left, you know.

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1 Q. Did you take her to the kitchen like you  
 2 did --  
 3 A. Yes.  
 4 Q. So you brought her to the kitchen just  
 5 like you did for the girls who gave him massages.  
 6 Correct?  
 7 A. Yes, sir.  
 8 Q. Did you ever pay her?  
 9 A. I don't remember, sir, but probably I  
 10 did.  
 11 MR. CRITTON: Form, move to strike,  
 12 speculation.  
 13 BY MR. MERMELSTEIN:  
 14 Q. Why do you say you probably did?  
 15 A. Because I was the only one paying --  
 16 well, not the only one but, you know, but chances  
 17 are I paid her but I don't remember that  
 18 particular instance that I gave her money.  
 19 Q. Is it fair to say that the girls who came  
 20 to the Palm Beach residence, these are not the  
 21 girls who are staying there, the girls who came --  
 22 were there to give massages. Correct?  
 23 MR. CRITTON: Form.  
 24 THE WITNESS: Yes.  
 25 BY MR. MERMELSTEIN:

26 (Pages 98 to 101)



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1 Q. And to the extent that this girl had come  
2 to the estate that's most likely what it would  
3 have been for, to give a massage. Correct?  
4 MR. CRITTON: Form.  
5 THE WITNESS: I didn't see the massage  
6 was occurring, sir.  
7 BY MR. MERMELSTEIN:  
8 Q. I understand that. But can you think of  
9 any other reason why this girl would have come to  
10 the Palm Beach residence?  
11 MR. CRITTON: Form.  
12 THE WITNESS: To visit, you know. You  
13 can get visits from these ladies so I don't  
14 know if they were giving the massage to be  
15 honest to you because if I say all the girls  
16 who gave a massage that would be -- I don't  
17 know, I don't think.  
18 BY MR. MERMELSTEIN:  
19 Q. Were there high school girls who just  
20 came to visit him?  
21 MR. CRITTON: Form.  
22 THE WITNESS: I don't know if they were  
23 in high school, sir, except this one that I  
24 give flowers.  
25 BY MR. MERMELSTEIN:

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1 Q. Okay. Were there girls who just came to  
2 visit and then came and then left during the same  
3 day? Who weren't there to perform any service?  
4 A. I'm sorry?  
5 Q. Were there girls who just came to visit  
6 who weren't there to perform any service during  
7 the course of a day?  
8 MR. CRITTON: Form.  
9 THE WITNESS: Yes, there were masseuses.  
10 BY MR. MERMELSTEIN:  
11 Q. Masseuses came there to give a service;  
12 didn't they?  
13 A. Yes.  
14 Q. Was there any girls who came to the Palm  
15 Beach residence just to visit, not to perform a  
16 service during the course of a day?  
17 MR. CRITTON: Form.  
18 THE WITNESS: I don't know, sir. I don't  
19 know.  
20 BY MR. MERMELSTEIN:  
21 Q. You don't recall that ever happening; do  
22 you?  
23 A. Well, sir, I brought them into the house,  
24 my duties was to call Sarah, Sarah will get them  
25 from the kitchen. I don't know if they get a

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1 masseuse -- they get a massage or they went to --  
2 I don't know what they did. Anything that  
3 happened upstairs in the house we didn't know it.  
4 I'm talking we the staff.  
5 Q. Okay. But this girl who you gave the  
6 flowers to was a girl that came to the front door  
7 and you brought into the kitchen and Sarah then  
8 met her there. Correct?  
9 A. Yes.  
10 Q. Just like the girls who would come for  
11 massages. Correct?  
12 A. Yes.  
13 Q. As we sit here today you don't know of  
14 any girls who just came to visit for no other  
15 reason other than to visit?  
16 MR. CRITTON: Form.  
17 THE WITNESS: For me they were visitors  
18 as I treat as a massage, you know. And like  
19 I say, I cannot say so and so came just for  
20 this or this purpose.  
21 BY MR. MERMELSTEIN:  
22 Q. Did you ever recall any of these girls  
23 saying that they were coming to work?  
24 MR. CRITTON: Form.  
25 THE WITNESS: No, sir.

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1 BY MR. MERMELSTEIN:  
2 Q. Did you ever refer to that term or  
3 expression, do you recall any girl ever using  
4 that?  
5 A. No.  
6 Q. Do you recall any girl ever calling the  
7 house and saying she wanted to work?  
8 A. No, sir, I don't remember.  
9 Q. You don't recall that?  
10 A. No.  
11 MR. MERMELSTEIN: All right. Let's take  
12 a break.  
13 (Thereupon, a recess was had.)  
14 THE VIDEOGRAPHER: Back on the record  
15 with tape number three.  
16 BY MR. MERMELSTEIN:  
17 Q. Mr. Rodriguez, at some point --  
18 (Thereupon, an interruption was had.)  
19 BY MR. MERMELSTEIN:  
20 Q. Mr. Rodriguez, at some point you spoke to  
21 a Palm Beach Police Detective.  
22 A. Yes.  
23 Q. Is that correct?  
24 A. Yes.  
25 Q. He was asking you questions about Mr.

27 (Pages 102 to 105)

<p style="text-align: right;">Page 106</p> <p>1 Epstein?</p> <p>2 A. Yes.</p> <p>3 Q. And you had an interview with him?</p> <p>4 A. Yes.</p> <p>5 Q. Did you also hand him documents at some</p> <p>6 point?</p> <p>7 A. Yes.</p> <p>8 Q. What did you give to him?</p> <p>9 A. I'm sorry?</p> <p>10 Q. What did you give to him? What did you</p> <p>11 hand him?</p> <p>12 A. A list of -- let me -- it was a list of</p> <p>13 -- it was like a yellow, what you call it, pad</p> <p>14 like that, my own writings of contractors, people</p> <p>15 who used to go there and phones.</p> <p>16 And I don't remember exactly what I give</p> <p>17 him but, you know, I have it with me and say can I</p> <p>18 have them and say can I borrow them and to this</p> <p>19 day I gave it to Detective Joe something.</p> <p>20 Q. Was it Detective Recarey?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Was this a journal of some kind</p> <p>23 that you maintained?</p> <p>24 A. Not necessarily, no. It was just my own</p> <p>25 notes and I had it with me so he asked me can I</p>	<p style="text-align: right;">Page 108</p> <p>1 among them contractors. And because this is five</p> <p>2 years ago, you know, I don't exactly remember</p> <p>3 that.</p> <p>4 Q. Okay. Did you include in this list of</p> <p>5 people who came into the house the girls who had</p> <p>6 come to give massages?</p> <p>7 A. Probably there were some names there,</p> <p>8 sir.</p> <p>9 Q. Why were there only some names?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: Because it was an informal</p> <p>12 list, you know, it was not like A to Z</p> <p>13 thing, I just write it down sometimes.</p> <p>14 BY MR. MERMELSTEIN:</p> <p>15 Q. Did Sarah Kellen or Mr. Epstein or</p> <p>16 Ms. Maxwell instruct you to maintain a list of the</p> <p>17 people who came into the house?</p> <p>18 A. No, I do this, this is my job, you know.</p> <p>19 I do this in another place I used to work to have</p> <p>20 those telephone numbers handy because it's</p> <p>21 basically day to day, you know, you want to have</p> <p>22 some reference.</p> <p>23 Q. Okay. So this list included a person's</p> <p>24 name?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 107</p> <p>1 borrow this from you.</p> <p>2 Q. You had it with you?</p> <p>3 A. Yes.</p> <p>4 Q. With you for what; your interview?</p> <p>5 A. No, because I was subpoena with the</p> <p>6 District Attorney and I had some notes and so I</p> <p>7 had it with me.</p> <p>8 Q. So you brought the notes with you to the</p> <p>9 interview?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And when you were there you were</p> <p>12 interviewed -- and this is the interview you</p> <p>13 mentioned was tape recorded?</p> <p>14 A. Yes.</p> <p>15 Q. And when you arrived for the interview</p> <p>16 during the course of the interview did Mr. Recarey</p> <p>17 ask you to hand over these papers?</p> <p>18 A. He saw me going through my papers and</p> <p>19 said can I have those.</p> <p>20 Q. And you handed it to him right there?</p> <p>21 A. You know, I was -- yes.</p> <p>22 Q. Okay. And describe again what was on</p> <p>23 these papers.</p> <p>24 A. As far as I remember they were my</p> <p>25 personal notes of people coming to the house,</p>	<p style="text-align: right;">Page 109</p> <p>1 Q. And their telephone number?</p> <p>2 A. Yes.</p> <p>3 Q. Did it have any other information?</p> <p>4 A. I don't remember.</p> <p>5 Q. How many pages was it? You mentioned it</p> <p>6 was like a legal pad?</p> <p>7 A. Yes. I put it in the file probably,</p> <p>8 there were four or five pages.</p> <p>9 Q. Was it single spaced, you had a name and</p> <p>10 a phone number on each line?</p> <p>11 A. Yeah, they were single spaced.</p> <p>12 Q. Did you write anything about who that</p> <p>13 person was, what their relationship to Mr. Epstein</p> <p>14 was?</p> <p>15 A. No.</p> <p>16 Q. Just a name and a phone number?</p> <p>17 A. A name and phone number and sometimes</p> <p>18 dates.</p> <p>19 Q. What were the dates for?</p> <p>20 A. It was for me to know that this person</p> <p>21 was in the house a week ago.</p> <p>22 Q. Okay. So it indicated when they were</p> <p>23 there?</p> <p>24 A. These people were familiar because I was</p> <p>25 in charge of security, I need to see if these</p>



<p style="text-align: right;">Page 110</p> <p>1 people, they were sometimes, you know, you need to</p> <p>2 have some kind of reference to yourself because</p> <p>3 you have too many information in your head, so it</p> <p>4 was like a cross reference for me that these</p> <p>5 people were in the house before so I used to jot</p> <p>6 around telephone numbers and names.</p> <p>7 Q. And this was a reference you kept for</p> <p>8 yourself?</p> <p>9 A. Yes, it was personal.</p> <p>10 Q. Okay. And that way if you were ever</p> <p>11 asked by Mr. Epstein or Ms. Kellen or Ms. Maxwell</p> <p>12 about someone who had come into the house you</p> <p>13 would have it on your pad?</p> <p>14 A. Yes.</p> <p>15 Q. Were there entries there for each day</p> <p>16 that people came?</p> <p>17 A. No, not necessarily.</p> <p>18 Q. People come to the house every day.</p> <p>19 Right?</p> <p>20 A. Yes.</p> <p>21 Q. And on some occasions it was the first</p> <p>22 time they were there. Correct?</p> <p>23 A. Yes.</p> <p>24 Q. And you would write down their name and</p> <p>25 phone number?</p>	<p style="text-align: right;">Page 112</p> <p>1 information on this pad? If someone came to the</p> <p>2 front door you would escort them to the kitchen.</p> <p>3 Correct? What point would you get their name and</p> <p>4 phone number?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: At the end of each day I</p> <p>7 will have to prepare stuff for the next day</p> <p>8 so I will always make this is what happened</p> <p>9 today because sometimes it's very hectic so</p> <p>10 I make notes for tomorrow, this is what</p> <p>11 we're going to do, so I used to for my own</p> <p>12 information give these numbers and names,</p> <p>13 like I said, they were not only masseuses</p> <p>14 they were, you know, names of contractors</p> <p>15 that need to get back in the house. Notes</p> <p>16 for myself that was basically instead of</p> <p>17 having a personal computer I used to have</p> <p>18 that.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. When you came to the front door to let</p> <p>21 someone in you had to enter the code on the wall.</p> <p>22 Correct?</p> <p>23 A. Yes.</p> <p>24 Q. Did you have in your hand something to</p> <p>25 write with and a pen?</p>
<p style="text-align: right;">Page 111</p> <p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. MERMELSTEIN:</p> <p>4 Q. As you indicated this would include girls</p> <p>5 who came for massages. Correct?</p> <p>6 A. Yes.</p> <p>7 Q. And wouldn't the list have been longer</p> <p>8 than four or five pages if it recorded all this</p> <p>9 information about who was coming into the house?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: I don't remember, sir, to</p> <p>12 be honest with you. He probably have it in</p> <p>13 his possession but --</p> <p>14 BY MR. MERMELSTEIN:</p> <p>15 Q. Okay. So it could have been longer than</p> <p>16 four or five pages; is that what you're saying?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: Yes.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. It's in Detective Recarey's possession?</p> <p>21 A. Yes.</p> <p>22 Q. Or you haven't seen it since you gave it</p> <p>23 to him?</p> <p>24 A. No.</p> <p>25 Q. Okay. Now, when would you write down the</p>	<p style="text-align: right;">Page 113</p> <p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: No, that was kept in the</p> <p>3 staff house.</p> <p>4 BY MR. MERMELSTEIN:</p> <p>5 Q. The note pad you're referring to --</p> <p>6 A. I used to have my own office, I used to</p> <p>7 keep these in my office.</p> <p>8 Q. Okay. Well, I'm trying to -- obviously,</p> <p>9 someone who walked into the house you escorted</p> <p>10 them into the kitchen. Correct?</p> <p>11 A. Yes.</p> <p>12 Q. You didn't memorize their name and phone</p> <p>13 number at that point?</p> <p>14 A. No, but I used to go and write it down.</p> <p>15 Q. Okay. They would give it to you and you</p> <p>16 would go and write it down?</p> <p>17 A. No, no, no. I would escort this lady or</p> <p>18 this person into the house, go to my staff house</p> <p>19 in my office and write it down.</p> <p>20 Q. Okay. But you wouldn't write down her</p> <p>21 telephone number as she gave it to you?</p> <p>22 A. No.</p> <p>23 Q. You would memorize it then write it down</p> <p>24 when you got to the staff house?</p> <p>25 A. I would get it from this.</p>

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1 Q. You would get it from the message pad?  
 2 A. Yeah. Then I will match the name with  
 3 the number as a source of information for me  
 4 because if somebody walks into the house and says,  
 5 I'm Maria, how you going to know really -- it was  
 6 a source of -- it was a tool for making my job  
 7 easier.  
 8 Q. Okay. So if someone walks in the house  
 9 and says they're Maria, then you could always  
 10 cross reference them with a message?  
 11 A. Yes.  
 12 Q. Okay. It would always be a message  
 13 indicating their name and phone number on it?  
 14 A. Yes.  
 15 MR. CRITTON: Form.  
 16 BY MR. MERMELSTEIN:  
 17 Q. And then you would take that and put it  
 18 on your pad?  
 19 A. Yes.  
 20 Q. Okay. So if I understand the  
 21 progression, you would -- the person would come to  
 22 the door, you would escort them into the kitchen,  
 23 they would say I'm Maria, you would then at some  
 24 point during the day you would go to your message  
 25 pad that we looked at was Exhibit 1, you would see

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1 there was a message with the name Maria and her  
 2 phone number and then you would write it down on  
 3 your yellow pad?  
 4 A. Yes.  
 5 Q. Okay. Did I misstate anything there in  
 6 terms of how it went?  
 7 A. No.  
 8 Q. Okay. You didn't keep a copy of this  
 9 when you gave it to Detective Recarey?  
 10 A. No.  
 11 Q. Were there any other papers or documents  
 12 that you gave to Detective Recarey?  
 13 A. There was some other stuff but I don't  
 14 remember exactly, you know, they were notes that I  
 15 have. Nothing I don't think fan notes or anything  
 16 of that.  
 17 MR. MERMELSTEIN: Let me mark this as the  
 18 next Exhibit 2.  
 19 (Exhibit 2 was marked for  
 20 Identification.)  
 21 BY MR. MERMELSTEIN:  
 22 Q. Take a look through Exhibit 2 and let me  
 23 know if there is any papers or documents in here  
 24 that you gave to Detective Recarey.  
 25 MR. WILLITS: This is Richard Willits. I

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1 must have been cut off by the lightening  
 2 strike, I'm not aware of Exhibit 2.  
 3 MR. MERMELSTEIN: It's just a compilation  
 4 of papers that I've handed him.  
 5 MR. WILLITS: Okay.  
 6 MR. CRITTON: The question is did he give  
 7 any of the documents in Exhibit 2 to  
 8 Detective Recarey?  
 9 MR. MERMELSTEIN: Yes.  
 10 THE WITNESS: I believe there were these  
 11 notes.  
 12 BY MR. MERMELSTEIN:  
 13 Q. Okay. I got to go through this exercise  
 14 because it was helpful on Exhibit 1, but I'm going  
 15 to number the pages.  
 16 MR. CRITTON: You got twelve pages. Is  
 17 that right?  
 18 MR. MERMELSTEIN: Yes.  
 19 BY MR. MERMELSTEIN:  
 20 Q. Okay. You started to say that you did  
 21 turn over certain of the pages in this Exhibit 2  
 22 to Mr. Recarey and you're referencing page five?  
 23 A. Yes.  
 24 Q. Okay. And what about page six?  
 25 A. Yes.

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1 Q. Any other pages in this exhibit?  
 2 A. No.  
 3 Q. Okay. Do you recall giving him anything  
 4 other than these two pages out of your note pad?  
 5 A. I don't remember, sir.  
 6 Q. Let's look at what's on pages five and  
 7 six. What's this referring to? Is that your  
 8 handwriting? I'm sorry, strike the first  
 9 question.  
 10 Is this your handwriting on page five?  
 11 A. At the bottom is.  
 12 Q. The reference to Dollar Rent a Car?  
 13 A. Yes.  
 14 Q. That's your handwriting?  
 15 A. Yes.  
 16 Q. The handwriting on top is not yours?  
 17 A. No.  
 18 Q. What's the reference to Dollar Rent a  
 19 Car, what's that there?  
 20 A. I rent a car for -- for one of the girls,  
 21 and the rental car was only because when you go  
 22 over a month you have to go into a lease contract  
 23 so the Dollar Rent a Car Company contact me to  
 24 renew that and I can have the car for another  
 25 month.

30 (Pages 114 to 117)

<p style="text-align: right;">Page 118</p> <p>1 Q. Who was the girl that you rented the car 2 for? 3 A. I don't remember, sir. 4 Q. If you look at page six, is this your 5 handwriting? 6 A. No. 7 Q. That's not your handwriting? 8 A. No. 9 Q. Is it Mr. Epstein's handwriting? 10 MR. CRITTON: Form. 11 THE WITNESS: I don't think so. 12 BY MR. MERMELSTEIN: 13 Q. Is it Sarah Kellen's handwriting? 14 A. Could be, I'm not sure, sir. 15 Q. Explain to me what is on page six, what's 16 that information? 17 MR. CRITTON: Form. Do you want him to 18 read what's there? Form. 19 THE WITNESS: To get an extension the 20 rental car for another month because it was 21 not lease it was rental. Then buy bucket of 22 roses from Royal Palm Beach and deliver it 23 to Royal Palm Beach High School, here's the 24 name, A. 25 BY MR. MERMELSTEIN:</p>	<p style="text-align: right;">Page 120</p> <p>1 A. No, I don't think so. 2 Q. Okay. Did you have an understanding as 3 to why Mr. Epstein was renting a car for A.? 4 A. No, sir. 5 Q. And you understood it was a rental for 6 over a month. Correct? 7 A. Yes. 8 Q. Now, as I understand, she already had the 9 car. Correct? 10 A. Yes. 11 Q. So you just had to go to the rent a car 12 place, the Dollar Rent a Car and do the paperwork. 13 Is that correct? 14 A. Yes. 15 Q. Okay. So they didn't have to see the car 16 again, you didn't have to bring it back? 17 A. No. 18 Q. So, with respect to what's on this page 19 six of Exhibit 2, your contact with A. was to hand 20 her the flowers. Correct? 21 A. Yes. 22 Q. Okay. You didn't need her for purposes 23 of re-renting the car. Correct? 24 A. No. 25 Q. Did you go with her to rent the car in</p>
<p style="text-align: right;">Page 119</p> <p>1 Q. So A. would be the girl who you delivered 2 the flowers to? 3 A. Yes. 4 Q. The girl you testified earlier that you 5 delivered flowers to the high school performance. 6 Correct? 7 A. Yes. 8 Q. That was only one time you ever did that. 9 Correct? 10 A. Yes. 11 Q. So this A. must be that girl. Correct? 12 A. Yes. 13 Q. Now, there is a one and a two here, 14 number one is it appears that it's whited out but 15 it says A. car. Is that correct? 16 A. Yes. 17 Q. Okay. Extension one month. Is that what 18 you were just referring to? 19 A. Yes. 20 Q. So it would appear to be the same girl 21 you gave the flowers to you extended the rent a 22 car for? 23 A. Yes. 24 Q. Was there any other girls that you rented 25 cars for while you were --</p>	<p style="text-align: right;">Page 121</p> <p>1 the first instance? 2 A. No, I brought it to the house. 3 Q. Okay. You rented the car and brought it 4 to the house. Correct? 5 A. Yes. 6 Q. Did you list her as a driver on the 7 application? 8 A. I don't remember, sir. 9 Q. But it's your understanding that only she 10 was driving the car. Correct? 11 A. Yes. 12 Q. Let me go to some of the other pages in 13 this exhibit. If you look at page one, that's 14 your signature on this check? 15 A. Yes. 16 Q. And this Colonial Bank, is that the 17 account where the house account was located? 18 A. Yes. 19 Q. As you indicated you were a signatory on 20 that account and so was Ghislaine Maxwell? 21 A. Yes. 22 Q. Okay. And is this how you would obtain 23 generally cash from the account, you would write a 24 check to cash? 25 A. Yes.</p>

<p style="text-align: right;">Page 122</p> <p>1 Q. I see on this page two you endorsed the</p> <p>2 check. Correct?</p> <p>3 A. Yes.</p> <p>4 Q. And then there is another page three of</p> <p>5 the check dated December 8, 2004. Correct?</p> <p>6 A. Yes.</p> <p>7 Q. And that's also a thousand dollars?</p> <p>8 A. Yes.</p> <p>9 Q. And one of the uses of this cash would be</p> <p>10 to pay the girls who came to give massages.</p> <p>11 Correct?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. MERMELSTEIN:</p> <p>15 Q. That's your endorsement on page four of</p> <p>16 this exhibit. Correct?</p> <p>17 A. Yes.</p> <p>18 Q. Exhibit 2?</p> <p>19 A. Yes.</p> <p>20 Q. The page 7 through 11 appear to be</p> <p>21 statement history or statement list. Do you see</p> <p>22 that?</p> <p>23 A. Yes.</p> <p>24 MR. CRITTON: Form.</p> <p>25 BY MR. MERMELSTEIN:</p>	<p style="text-align: right;">Page 124</p> <p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: Probably it came from</p> <p>3 another account, sir, but I don't know.</p> <p>4 BY MR. MERMELSTEIN:</p> <p>5 Q. I'm sorry, a what?</p> <p>6 A. Another account, but the amount why is</p> <p>7 that odd, I don't know.</p> <p>8 Q. You don't recall the reason for that</p> <p>9 particular amount?</p> <p>10 A. No.</p> <p>11 Q. And the next, 9,747.32, you don't recall?</p> <p>12 A. No.</p> <p>13 Q. Okay. Was there like a minimum which</p> <p>14 would trigger you to say I need more money in that</p> <p>15 account?</p> <p>16 A. Below 2,000, yes, I would have to call</p> <p>17 for more money.</p> <p>18 Q. Below 2,000 was the rule. Correct?</p> <p>19 A. Yes, more or less, sir.</p> <p>20 Q. Okay. Just look at the last page of the</p> <p>21 exhibit. Again, is that your handwriting?</p> <p>22 A. Yes.</p> <p>23 Q. On the upper left where it says check</p> <p>24 written by Alfredo Rodriguez --</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 123</p> <p>1 Q. And this is for the account that --</p> <p>2 A. Household account.</p> <p>3 Q. That's for the household account?</p> <p>4 A. Uh-huh.</p> <p>5 Q. Do you recall why this was printed out</p> <p>6 or --</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: I don't remember, sir.</p> <p>9 BY MR. MERMELSTEIN:</p> <p>10 Q. I notice there are some incoming wires</p> <p>11 indicated on this dated December 6th and</p> <p>12 December 15th. I take it the account was funded</p> <p>13 through the incoming wires. Correct?</p> <p>14 A. Yes.</p> <p>15 Q. Would there be communication that more</p> <p>16 money is needed in the account, how would that</p> <p>17 work?</p> <p>18 A. I would call Bella in New York and she</p> <p>19 would put money into that account.</p> <p>20 Q. Okay. Did you say how much you needed or</p> <p>21 you just said you need more money?</p> <p>22 A. I will say the amount and she put in the</p> <p>23 money.</p> <p>24 Q. Okay. It seems to be an odd amount</p> <p>25 \$13,551.17, how did you determine that?</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. -- what's the first word there?</p> <p>2 A. Last check written by.</p> <p>3 Q. Alfredo Rodriguez. I take it this is the</p> <p>4 last check written while you were employed?</p> <p>5 A. Something like that, yes.</p> <p>6 Q. Okay. But that's your handwriting?</p> <p>7 A. Yes, it is.</p> <p>8 Q. And this was a payroll check. Is that</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. For Jerome Pierre?</p> <p>12 A. You know, why I wrote this is because he</p> <p>13 went until he become under the New York office</p> <p>14 jurisdiction so I didn't pay him after that.</p> <p>15 Q. So he went to New York?</p> <p>16 A. Yes.</p> <p>17 Q. And worked for Mr. Epstein?</p> <p>18 A. No, no, he work here but his check came</p> <p>19 from New York.</p> <p>20 Q. Okay. Now, was it shortly after this</p> <p>21 that you left the employ of Mr. Epstein?</p> <p>22 A. I left at the end of February.</p> <p>23 Q. Why did you leave?</p> <p>24 A. The reason I was let go because they told</p> <p>25 me I took the wrong Suburban to Miami. Mrs.</p>

<p style="text-align: right;">Page 126</p> <p>1 Maxwell called me and said Jeffrey was upset  2 because you took the wrong Suburban, and it was an  3 excuse to fire me.  4 Q. Okay. And Ms. Maxwell gave you the news?  5 A. Yes.  6 Q. You never spoke to Jeffrey Epstein about  7 that?  8 A. No.  9 Q. By wrong Suburban I take it he had more  10 than one?  11 A. There were two identical black Suburbans.  12 One had XM radio the other one didn't.  13 Q. I see. By Suburban you mean Chevrolet  14 Suburban?  15 A. Yes, sir.  16 Q. SUV?  17 A. Yes.  18 Q. And you had instructions to take the one  19 with --  20 A. Without the XM radio.  21 Q. Without the XM radio.  22 A. But somehow, you know, they're both  23 identical vehicles, you know.  24 Q. And do you recall what you were doing on  25 this trip with that Suburban?</p>	<p style="text-align: right;">Page 128</p> <p>1 MR. CRITTON: Form of the last question  2 as to did he tell you.  3 THE WITNESS: No, no, he didn't. I kept  4 getting checks but I knew I was no longer  5 with them.  6 BY MR. MERMELSTEIN:  7 Q. Okay. But you continued to work until  8 the end of February?  9 A. Yes.  10 Q. And this was sometime before that?  11 A. Yeah.  12 Q. Two or three weeks before that?  13 A. Could be two weeks, yeah.  14 Q. Have you had any occasion to speak to Mr.  15 Epstein after you've left his employ?  16 A. I called the office and I talk to Lesley  17 but not Mr. Epstein.  18 Q. And what was your occasion to call the  19 office and speak to Lesley?  20 A. I wanted to confirm that I work for him  21 to put in my resume as a reference so Lesley wrote  22 a letter to me.  23 Q. Okay. So Lesley, again, she is in New  24 York?  25 A. Yes.</p>
<p style="text-align: right;">Page 127</p> <p>1 A. I went to my house to Miami.  2 Q. So you took it home for a weekend?  3 A. More or less, yes.  4 Q. That's when Mr. Epstein wasn't there?  5 A. He allowed me to go there while he was  6 there and he find out that I took the wrong  7 Suburban.  8 Q. Okay. Was that unusual that he would  9 allow you to go to Miami while he was there?  10 A. No.  11 Q. Okay. Because I thought earlier you  12 testified --  13 A. He arrived early one day and he wanted to  14 have the Suburban there.  15 Q. I see. So you didn't know he was going  16 to be in Palm Beach at the time?  17 A. Sarah told me that it's not necessary you  18 have to be right here now but you can come here  19 later, and then they find out I have the wrong  20 Suburban, something like that.  21 Q. I see. And did he give you like a  22 notice, two weeks?  23 A. No, he told me at the end of the month --  24 yeah, something like two or three weeks. He paid  25 me for two months, I guess.</p>	<p style="text-align: right;">Page 129</p> <p>1 Q. And she wrote a letter of reference for  2 you at your request?  3 A. Yes.  4 Q. What about Mr. Epstein himself, did you  5 ever speak to him after you left his employment?  6 A. No, never.  7 Q. What about Sarah Kellen, did you ever  8 speak to her after that?  9 A. Never again.  10 Q. Did any investigators contact you for Mr.  11 Epstein after you left his employment?  12 A. Yes.  13 Q. Okay. Tell me about that.  14 A. They went to my house in Miami and they  15 tell me that they work for Mr. Jeffrey Epstein, so  16 that we make a meeting in Miami Lakes at Don Shula  17 Hotel, we spoke for a couple of hours.  18 Q. When was this?  19 A. This was in two years after that,  20 probably -- 2005, I think.  21 Q. Well it was --  22 A. No, no, I'm sorry, 2006. I left in '05  23 and this started in 2006.  24 Q. Okay. Do you recall when in 2006?  25 A. I can call my wife but I don't remember</p>



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1 the month.  
 2 Q. Now, why would your wife know?  
 3 A. Because they knock on my door and, you  
 4 know, say well we are the head of security Mr.  
 5 Epstein, and my wife knew where I work and  
 6 everything and so she called me.  
 7 Q. Where were you working at the time?  
 8 A. I had my own restaurant in Miami.  
 9 Q. What was the name of your restaurant?  
 10 A. El Cristol.  
 11 Q. El Cristol?  
 12 A. Yes.  
 13 Q. That's with a C?  
 14 A. E-L C-R-I-S-T-O-L.  
 15 Q. Okay. And you own the restaurant?  
 16 A. No, I sold it.  
 17 Q. But at the time you owned it?  
 18 A. Yes, my wife and I.  
 19 Q. So these two people knock on your door  
 20 when your wife is there. Correct?  
 21 A. Yes.  
 22 Q. And they say they're head of security for  
 23 Mr. Epstein. Correct?  
 24 A. Yes.  
 25 Q. And do you know what their names were?

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1 A. I don't remember, sir, right now.  
 2 Q. Okay. And then you met with them at the  
 3 Don Shula Hotel?  
 4 A. Yes.  
 5 Q. For approximately two hours?  
 6 A. Yes.  
 7 Q. And what did you discuss?  
 8 A. They ask me who I talk to and that Mr.  
 9 Epstein wanted to offer me a lawyer, I declined  
 10 because I was working there, I had nothing to do  
 11 with this. My wife told me this but, you know, I  
 12 don't need a lawyer, why do I need a lawyer.  
 13 Q. Your wife told you you didn't need a  
 14 lawyer?  
 15 A. Yeah, something to that, you know. They  
 16 offered me because working for Mr. Epstein maybe I  
 17 had something to do, anything, I haven't done  
 18 anything wrong so I said I declined.  
 19 Q. Did they interview you about what you  
 20 observed while you were working at the house?  
 21 A. I'm sorry, what?  
 22 Q. Did they interview you about what you  
 23 observed while you were working at Mr. Epstein's  
 24 residence?  
 25 A. Yes.

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1 Q. And what do you recall telling them?  
 2 A. I told them that my job duties, the  
 3 hours, if I remember any names, where did I go.  
 4 Q. Was this before or after you spoke to  
 5 Detective Recarey?  
 6 A. Before.  
 7 Q. About how long before?  
 8 A. Three months before.  
 9 Q. And for your interview with Detective  
 10 Recarey you were subpoenaed. Is that correct?  
 11 A. Yes.  
 12 Q. Had you spoken to Detective Recarey or  
 13 anyone from the Palm Beach Police before that  
 14 time?  
 15 A. No, he went to my house.  
 16 Q. Did these investigators tell you to  
 17 expect that you were going to get contacted by the  
 18 Palm Beach Police?  
 19 A. No.  
 20 Q. Did they tell you what you should say if  
 21 you were interviewed about Mr. Epstein?  
 22 A. No.  
 23 Q. Anything else you can recall them saying  
 24 to you during this conversation during the meeting  
 25 at the Don Shula Hotel?

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1 A. No.  
 2 Q. Did they make any kind of threat to you?  
 3 A. No, I don't believe so.  
 4 Q. You don't believe so?  
 5 A. No.  
 6 Q. Was there anything they knew about you  
 7 that you may have been surprised about?  
 8 A. I'm sorry, what was that?  
 9 Q. Was there any information that they knew  
 10 about you that you were surprised they knew about?  
 11 A. No, no.  
 12 Q. Did you have any other meetings with  
 13 them?  
 14 A. I saw them twice.  
 15 Q. Okay. Once was at the Don Shula Hotel?  
 16 A. Yes. And the other one we met I think  
 17 that was outside my house. He came into my house.  
 18 Q. Was that a planned meeting?  
 19 A. No, he just -- my main gate told me that  
 20 so and so is -- you know, so he was waiting at my  
 21 house.  
 22 MS. EZELL: I'm sorry, who told you?  
 23 THE WITNESS: I have security at the  
 24 complex where I live and they told me that  
 25 this gentleman was waiting for me.

34 (Pages 130 to 133)



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1 MS. EZELL: The main gate, is that what  
2 you said?  
3 THE WITNESS: Yes.  
4 BY MR. MERMELSTEIN:  
5 Q. Okay. So that was an unplanned visit?  
6 A. Yes.  
7 Q. That was after the meeting at the Don  
8 Shula Hotel or before?  
9 A. That was before.  
10 Q. So I understand the sequence, two men  
11 came to your door when your wife was there.  
12 Correct?  
13 A. Actually -- yes, yes, exactly. Then we  
14 met at the Don Shula.  
15 Q. So then you met at the Don Shula?  
16 A. Yes.  
17 Q. And when did the man come to your house?  
18 A. It was like two weeks before that or  
19 something like that.  
20 Q. Two weeks before you met at the Don  
21 Shula?  
22 A. Yes.  
23 Q. And what did you discuss when he came to  
24 your house?  
25 A. The same questions I told the guy in Don

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1 Shula, and he sit down in a pad in my house and  
2 took notes who do I know, the phone numbers, if I  
3 talk to anybody. That was it.  
4 Q. And you hadn't spoken to anybody about  
5 Mr. Epstein before that?  
6 A. No.  
7 Q. The man who came to your house, was he  
8 one of the same men that you met with at the Don  
9 Shula Hotel?  
10 A. Yes.  
11 Q. And you don't recall his name?  
12 A. No, sir.  
13 Q. Did he explain to you why he was  
14 conducting this investigation and asking you these  
15 questions and seeking information from you?  
16 A. No. He just wanted to know if I talked  
17 to anybody outside the house. I was bound by a  
18 confidential agreement so I stick to that.  
19 Q. Okay. So you signed a confidentiality  
20 agreement with Mr. Epstein?  
21 A. Yes.  
22 Q. Okay. When did you sign that?  
23 A. When I was hired.  
24 Q. And what did that agreement provide?  
25 A. I shouldn't discuss anything, you know.

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1 Q. And your understanding of that was that  
2 was indefinite, that would last --  
3 A. To this day I don't understand the extent  
4 of that but, you know, I think I did my job and  
5 I'm out of it, you know.  
6 At the moment when these people went to  
7 ask me questions I thought I was bound with that  
8 confidentiality agreement but because I was  
9 subpoena in Palm Beach County and they asked me if  
10 you know this and this and the phone numbers, you  
11 have to tell the truth.  
12 Q. All right. I understand. But you  
13 understand that a confidentiality agreement -- let  
14 me strike that.  
15 I assume your understanding or is your  
16 understanding -- let me start again.  
17 Is your understanding that under a  
18 confidentiality agreement if you're not outside of  
19 a subpoena, outside of a legal obligation to talk  
20 with someone you weren't allowed to talk to anyone  
21 about Mr. Epstein?  
22 A. Exactly.  
23 Q. When these investigators came to your  
24 door did you have to verify that they in fact  
25 worked for Mr. Epstein?

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1 A. They gave me all the information, they  
2 told me I'm the head of security for Mr. Epstein.  
3 Q. Okay.  
4 A. They identified themselves with a name  
5 and number and everything. I have probably for  
6 awhile a business card, but I don't remember their  
7 names.  
8 Q. Okay. You think you still have the  
9 business cards still?  
10 A. Yes.  
11 Q. What about the confidentiality agreement,  
12 do you still have that?  
13 A. No, that was kept with Mr. Epstein.  
14 Q. He didn't give you a copy?  
15 A. No.  
16 Q. Did you have an employment contract?  
17 A. No.  
18 Q. Did you ever speak to any lawyer  
19 representing Mr. Epstein?  
20 A. Yes.  
21 Q. Who did you speak to?  
22 A. Jack Goldberger.  
23 Q. When did you talk to Mr. Goldberger?  
24 A. This was a year ago -- no, two years ago.  
25 Q. Was this before or after you had spoken

35 (Pages 134 to 137)

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1 to the detective --  
 2 A. After.  
 3 Q. Let me finish the question. Was this  
 4 before or after you spoke to Detective Recarey?  
 5 A. After.  
 6 Q. And what did Mr. Goldberger say to you,  
 7 what did you say to him?  
 8 A. I said to him the FBI is involved now and  
 9 I want to know what I'm supposed to do.  
 10 Q. Did you contact Mr. Goldberger?  
 11 A. Yes.  
 12 Q. So he didn't call you, you called him?  
 13 A. No, I called him.  
 14 Q. How did you know to call him?  
 15 A. Because I looked in the yellow pages.  
 16 Q. But you knew Mr. Epstein's lawyer was  
 17 Jack Goldberger?  
 18 A. Yeah, exactly, because I was looking at  
 19 the news. I read the Palm Beach Daily News every  
 20 day so I call him and then the FBI, very nice  
 21 people, they said they wanted to meet with me.  
 22 Q. Okay. So this is before you met with the  
 23 FBI agents you spoke with Jack Goldberger.  
 24 Correct?  
 25 A. Yes.

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1 Q. Okay. And you knew Jack Goldberger was  
 2 the attorney for Jeffrey Epstein because you read  
 3 that in the newspaper?  
 4 A. Yes.  
 5 Q. Again, about how long ago was this?  
 6 A. That was -- I was working for the  
 7 Hammond's so that was in 2006.  
 8 Q. Okay. Had you received a grand jury  
 9 subpoena?  
 10 A. No, no. We just -- they asked me, they  
 11 went to my house again.  
 12 Q. The FBI again?  
 13 A. Yes. A male and female agents, my wife  
 14 told them I was working in Palm Beach and I  
 15 couldn't leave so they wanted to meet me there.  
 16 Q. In Palm Beach?  
 17 A. Yes.  
 18 Q. But you found out that they were looking  
 19 for you, you called Jack Goldberger?  
 20 A. No, no, that was --  
 21 Q. Go ahead and clarify that, sorry.  
 22 A. Okay. Yeah, I called him before I met  
 23 the FBI I called Jack Goldberger.  
 24 Q. I guess my question is, at the time you  
 25 called him did you know that the FBI wanted to

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1 speak with you?  
 2 A. Yes.  
 3 Q. So before you spoke with them you called  
 4 Mr. Goldberger?  
 5 A. Yes.  
 6 Q. Why?  
 7 A. Because I wanted to see if I have any --  
 8 I don't know, I didn't have a lawyer on my side, I  
 9 wanted to see -- I feel like -- I don't know, I  
 10 needed legal advice and somehow I call him. I  
 11 should have had my own attorney but, you know, he  
 12 said it's okay, you know, just speak the truth.  
 13 Q. Okay. Again, what else do you recall  
 14 about the conversation that you had?  
 15 A. With Jack Goldberger?  
 16 Q. Yes.  
 17 A. That was very brief conversation, you  
 18 know, I ask him this and he said tell the truth.  
 19 Q. Was it by telephone?  
 20 A. Yes, by phone, I never met him in person.  
 21 Q. And all you recall him telling you was  
 22 say the truth?  
 23 A. Yes.  
 24 Q. And then you met with the FBI agents?  
 25 A. Yes.

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1 Q. In Palm Beach?  
 2 A. In Palm Beach.  
 3 Q. And that was when you were working there?  
 4 A. I'm sorry?  
 5 Q. That was when you were working as a house  
 6 manager in Palm Beach?  
 7 A. Yes.  
 8 Q. Any other lawyers you speak to for Mr.  
 9 Epstein?  
 10 A. I contacted him.  
 11 Q. You contacted Mr. Critton?  
 12 A. Yes.  
 13 Q. Okay. When did you do that?  
 14 A. When I find out that Mr. Epstein was  
 15 going to be out and I say, well, I don't know if  
 16 anybody was going to contact me or something.  
 17 Like I said before, you know, he was  
 18 probably on my side that I want to know if I need  
 19 to do something because I'm a witness, very  
 20 important witness in this case and so I told him  
 21 exactly what I'm telling you today, and he pay for  
 22 my gas because my car was -- and that's it.  
 23 Q. Okay. So you called Mr. Critton, he  
 24 didn't call you?  
 25 A. No, I call him.

36 (Pages 138 to 141)

<p style="text-align: right;">Page 142</p> <p>1 Q. Okay. And this was when you found out 2 that Mr. -- 3 A. No, I called Jack Goldberger, I'm sorry, 4 and somebody give me his number. 5 Q. I see. And what prompted you to call him 6 was you saw that Mr. Epstein was getting out of 7 jail? 8 A. Yes. 9 MR. CRITTON: Him meaning Mr. Goldberger? 10 MR. MERMELSTEIN: Yes. 11 BY MR. MERMELSTEIN: 12 Q. I'll restate the question. 13 When you called Mr. Goldberger it was 14 because you had read that Mr. Epstein was getting 15 out of jail? 16 A. Yes. 17 Q. Why did that prompt you to seek legal 18 advice or legal counsel? 19 A. Because I know -- I don't have money for 20 lawyers right now, I'm unemployed. So the normal 21 thing for me is to say, okay, what I'm supposed to 22 do here, you know, maybe they can refer me to 23 another lawyer or something. 24 Q. Okay. Was this after you received a 25 subpoena for the deposition that you're here on</p>	<p style="text-align: right;">Page 144</p> <p>1 lawyer, what I'm supposed to do here. And he told 2 me the same thing, to tell the truth, you know. 3 It was with his assistant. 4 Q. It was with his assistant? 5 A. Yes. 6 Q. You didn't speak to him personally? 7 A. No, we sit down in a room. 8 Q. So you drove up to West Palm Beach? 9 A. Yeah. 10 Q. Okay. And you had a sit down meeting 11 with Mr. Critton? 12 A. Yes. 13 Q. About how long did that last? 14 A. Two hours, something like that. 15 Q. Any other lawyers did you speak to about 16 Mr. Epstein? 17 A. No. 18 Q. Any other investigators that you haven't 19 mentioned yet today that you spoke to about Mr. 20 Epstein? 21 A. No. 22 Q. Okay. Any other person employed by Mr. 23 Epstein did you speak to after -- 24 A. No. 25 Q. Current or former employees, did you</p>
<p style="text-align: right;">Page 143</p> <p>1 today, the first subpoena? 2 A. Before. 3 Q. Before you were subpoenaed? 4 A. Before. 5 Q. I'm trying to understand why did you 6 think that you would be contacted again as a 7 witness because Mr. Epstein was getting out of 8 jail? 9 A. I think you're right. I got the 10 subpoena, yes, yes. 11 Q. Okay. You got the subpoena for the civil 12 deposition? 13 A. Yes, exactly. 14 Q. Which is why we're here today? 15 A. Exactly. 16 Q. And after you received that subpoena you 17 called Mr. Goldberger? 18 A. Yes. 19 Q. And he referred you to Mr. Critton? 20 A. Yes. 21 Q. And then you spoke to Mr. Critton? 22 A. Yes. 23 Q. And what did you say to him, what did he 24 say to you? 25 A. I'm going to subpoena -- I don't have a</p>	<p style="text-align: right;">Page 145</p> <p>1 speak to anyone else after you left his employ? 2 A. No. 3 Q. You never spoke to Sarah Kellen again? 4 A. No. 5 Q. Did you have a cell phone when you worked 6 for Mr. Epstein? 7 A. Yes, I did. 8 Q. Was that a cell phone provided by Mr. 9 Epstein? 10 A. Yes. 11 Q. What was the phone number on that? 12 A. Area code 561 but I don't remember. 13 Q. What was the -- do you remember the 14 service provider? 15 A. AT&amp;T. 16 Q. That account was in the name of Mr. 17 Epstein? 18 A. Yes. 19 MR. CRITTON: Form. 20 BY MR. MERMELSTEIN: 21 Q. Other than what you turned over to Mr. 22 Recarey is there any other papers that you kept 23 relating to your employment with Mr. Epstein? 24 A. No. 25 Q. And he never gave anything back to you;</p>

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1 correct, that you handed to him?  
 2 A. I'm sorry, who?  
 3 Q. Detective Recarey.  
 4 A. No, sir.  
 5 Q. Did you ever give any papers to any of  
 6 the lawyers for Mr. Epstein either Mr. Goldberger  
 7 or Mr. Critton?  
 8 A. No.  
 9 Q. What about the investigators, did you  
 10 give them any papers or documents?  
 11 A. No.  
 12 Q. I'm going to ask you some names of girls  
 13 who are alleged to have come over to the house,  
 14 Mr. Epstein's residence in Palm Beach and ask you  
 15 if you recall these girls or what you recall.  
 16 H.R.?  
 17 A. I believe so.  
 18 MR. CRITTON: I'm sorry?  
 19 THE WITNESS: I believe so.  
 20 BY MR. MERMELSTEIN:  
 21 Q. What do you remember about H.R.?  
 22 A. She used to come to the house.  
 23 Q. And did you bring her into the kitchen?  
 24 A. All the girls I brought into the kitchen,  
 25 it was the same routine.

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1 Q. Okay. Was it your understanding she came  
 2 to give Mr. Epstein a massage?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: I don't know, sir.  
 5 BY MR. MERMELSTEIN:  
 6 Q. Did she come with another girl?  
 7 A. I don't remember, sir.  
 8 Q. Did she come often?  
 9 A. I'm sorry?  
 10 Q. Would she come to the house often?  
 11 A. Yes.  
 12 Q. You don't remember whether she came  
 13 alone, with another girl, or two other girls?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: I don't remember, sir.  
 16 BY MR. MERMELSTEIN:  
 17 Q. Did you ever see Mr. Epstein and H.R.  
 18 together?  
 19 A. No.  
 20 Q. You would just escort her into the  
 21 kitchen?  
 22 A. Yes, sir.  
 23 Q. Did you pay H.R.?  
 24 A. I don't remember, sir. Probably I did,  
 25 sir.

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1 Q. But you don't remember?  
 2 A. I don't remember.  
 3 Q. Why do you say probably you did?  
 4 A. Because I was the person in charge of  
 5 paying and I probably did because if it was not me  
 6 it was her.  
 7 Q. Because what?  
 8 A. If it was not me it was Sarah.  
 9 Q. If it wasn't you it was Sarah. Okay.  
 10 But you were paying girls for massages.  
 11 Correct?  
 12 MR. CRITTON: Form.  
 13 THE WITNESS: Yes.  
 14 BY MR. MERMELSTEIN:  
 15 Q. V., do you recall a girl named V.?  
 16 A. No.  
 17 Q. V.Z.?  
 18 A. No.  
 19 Q. Does that ring a bell at all?  
 20 A. No.  
 21 Q. How about Y.?  
 22 A. No, sir.  
 23 Q. Y.L.?  
 24 A. No.  
 25 Q. M.L.?

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1 A. No.  
 2 Q. What about F.P.?  
 3 A. Who?  
 4 Q. F.P.  
 5 A. No, sir.  
 6 Q. You don't recall any of those names. You  
 7 indicated you used the computer in the house?  
 8 A. Yes.  
 9 Q. Did he have a server where all the  
 10 computers are linked?  
 11 A. We used to Citrix but because there were  
 12 too many properties we used to have a guy who used  
 13 to take care of the --  
 14 Q. Were the computers linked in Florida and  
 15 New York?  
 16 A. I believe so, yes.  
 17 Q. Were there data files on the computers --  
 18 MR. CRITTON: Form.  
 19 BY MR. MERMELSTEIN:  
 20 Q. -- in the house?  
 21 A. I don't know, sir, because I was using my  
 22 own computer and they have their own computers  
 23 inside the house.  
 24 Q. Okay. So you had your own computer?  
 25 A. Yes.

38 (Pages 146 to 149)

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1 Q. You had a laptop?  
 2 A. No, it was desktop.  
 3 Q. Okay. So you had your own desktop in the  
 4 staff house?  
 5 A. Yeah. Exactly.  
 6 Q. And you don't know what was -- what was  
 7 the files in that computer versus on the other  
 8 computers?  
 9 A. No, sir.  
 10 Q. Did you ever see any pornography on any  
 11 of the computers?  
 12 A. No, sir.  
 13 Q. Are you sure about that?  
 14 A. Pornography as in sexual acts, no.  
 15 Q. Pornography as in naked people, men or  
 16 women.  
 17 A. Yeah, there were some.  
 18 Q. Okay. And describe to me what that was.  
 19 A. They were like models.  
 20 Q. And where were those in the computer? I  
 21 mean, how did you access that?  
 22 A. They were in the files and some of it  
 23 in -- you mean which file they were, what was your  
 24 question?  
 25 Q. Where were they in the computer? There

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1 were downloaded files on computer?  
 2 A. They were downloaded, yes.  
 3 MR. CRITTON: Form.  
 4 BY MR. MERMELSTEIN:  
 5 Q. Okay. There were photographs of naked  
 6 women?  
 7 A. Models.  
 8 Q. And why do you say models?  
 9 A. Because it was like a catalog so you have  
 10 models, you know.  
 11 Q. And what was your understanding as a  
 12 source of these photos?  
 13 A. I don't know, sir. It was just a  
 14 curiosity on myself and it was -- it was none of  
 15 my business but, you know, I just happen to see  
 16 them there.  
 17 Q. Did these girls appear very young to you?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: No, sir. They were young  
 20 but not underage.  
 21 BY MR. MERMELSTEIN:  
 22 Q. Is there anything in particular that  
 23 makes you draw that conclusion?  
 24 A. Because they are developed, you know.  
 25 It's hard to say, sir, you know.

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1 Q. The girls who came to the house for  
 2 massages, did you ever call a cab to bring any of  
 3 the girls home?  
 4 A. Probably on a few occasions.  
 5 Q. So is it your understanding that they  
 6 would have arrived by cab as well?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: Yes.  
 9 BY MR. MERMELSTEIN:  
 10 Q. And how would that come about, were you  
 11 given instructions to call a cab by anyone?  
 12 A. No, I would call the cab, the taxi.  
 13 Q. How did you know a cab needed to be  
 14 called?  
 15 A. Because Sarah would tell me can you get  
 16 me a taxi.  
 17 Q. So when the girl was finished what she  
 18 was doing Sarah would come to you and say --  
 19 A. She would call me.  
 20 MR. CRITTON: Form.  
 21 BY MR. MERMELSTEIN:  
 22 Q. She would call you?  
 23 A. Yes.  
 24 Q. Okay. You would be in the guest house at  
 25 the time?

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1 A. Yes.  
 2 Q. Do you recall having to do that often?  
 3 A. No, not very often, sir.  
 4 Q. Did Mr. Epstein keep photograph equipment  
 5 in the house?  
 6 A. I don't remember seeing it.  
 7 Q. Do you recall seeing any video equipment?  
 8 A. No, sir.  
 9 Q. Do you recall any video or photograph  
 10 equipment in the master bedroom?  
 11 A. No, sir.  
 12 Q. The models that you saw on the computer,  
 13 did you recognize any of them as having been at  
 14 the house?  
 15 A. No.  
 16 Q. The girls who stayed at the house, did  
 17 any of them speak with a foreign accent?  
 18 A. Yes.  
 19 Q. Many of them?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: Some of them.  
 22 BY MR. MERMELSTEIN:  
 23 Q. Would any of them not speak any English?  
 24 A. No.  
 25 Q. They all spoke English?



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1 A. They all --  
 2 Q. But some of them had accents?  
 3 A. Yes.  
 4 Q. Were they from one place in particular?  
 5 A. Europe.  
 6 Q. Eastern Europe?  
 7 A. Could be.  
 8 MR. CRITTON: Did you say could be, is  
 9 that what you said?  
 10 THE WITNESS: Could be.  
 11 MR. CRITTON: Form.  
 12 BY MR. MERMELSTEIN:  
 13 Q. That would be your guess as to where they  
 14 were from?  
 15 A. Yes, but I'm not an expert in languages,  
 16 sir, but they had accent.  
 17 Q. Do you know how Mr. Epstein came into  
 18 contact with these girls or became friends with  
 19 them?  
 20 A. No, sir.  
 21 Q. Did you ever talk to any of them about  
 22 how they met Mr. Epstein?  
 23 A. No.  
 24 Q. Did you and the other members of the  
 25 staff that worked for you, did you ever talk about

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1 Mr. Epstein?  
 2 A. Sometimes.  
 3 Q. What kind of things would you talk about?  
 4 A. Where do you think these girls are from,  
 5 what are they doing, you know, are they going to  
 6 college, Louella used to ask me that, but I mean,  
 7 beyond that we didn't --  
 8 Q. By these girls which ones are you  
 9 referring to?  
 10 A. The one that were coming in the plane.  
 11 Q. Plane. You didn't have that kind of --  
 12 A. Louella was gone by 5:00. Five p.m. she  
 13 was gone. She would work from eight to five. So  
 14 most of the early evening I was there by myself.  
 15 Q. Okay. But the question was, did you ever  
 16 talk with Louella about the girls who were coming  
 17 for massages?  
 18 A. No.  
 19 Q. And that would have been before 5:00 as  
 20 well. Right?  
 21 A. Yeah.  
 22 Q. So she saw girls coming?  
 23 A. Yeah, exactly, but we never -- we didn't  
 24 have a chance because we were busy, you know. But  
 25 we never had that conversation.

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1 Q. Okay. But you did speculate with Louella  
 2 about the girls who stayed at the house and flew  
 3 in with Mr. Epstein. Correct?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: Sometimes, yes.  
 6 BY MR. MERMELSTEIN:  
 7 Q. Were there rumors that either you or her  
 8 heard about those girls?  
 9 MR. CRITTON: Form.  
 10 THE WITNESS: No.  
 11 BY MR. MERMELSTEIN:  
 12 Q. Do you remember anything more specific  
 13 about things Louella may have observed about these  
 14 girls?  
 15 A. No.  
 16 Q. Anyone else that you spoke to about --  
 17 A. No, nobody.  
 18 Q. Nobody else on the staff you ever spoke  
 19 to about any of the girls?  
 20 A. No.  
 21 MR. MERMELSTEIN: Why don't we break and  
 22 I'm going to pass the baton.  
 23 THE VIDEOGRAPHER: We're off the record.  
 24 (Thereupon, a recess was had.)  
 25 THE VIDEOGRAPHER: We're back on the

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1 record tape with number four.  
 2 EXAMINATION  
 3 BY MR. EDWARDS:  
 4 Q. Mr. Rodriguez, my name is Brad Edwards, I  
 5 represent in these cases E.W. who is -- and I'll  
 6 tell you right now, C.W., we talked about  
 7 earlier --  
 8 (Thereupon, an interruption was had.)  
 9 MR. CRITTON: We're ready.  
 10 BY MR. EDWARDS:  
 11 Q. I represent L.M., who is T.M., I'm going  
 12 to ask you some questions about her as well, and  
 13 Jane Doe, S.R.  
 14 Are those names that you're familiar  
 15 with?  
 16 A. Currently, yes.  
 17 Q. How about T.?  
 18 A. How do you spell her?  
 19 Q. (Off the record.)  
 20 A. Yeah, I remember her.  
 21 Q. You remember what she looks like?  
 22 A. If I see her I will remember her.  
 23 Q. During the six month or so period that  
 24 you worked there how often would you see T.?  
 25 A. Okay, to answer the question, when Mr.

40 (Pages 154 to 157)



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1 Epstein was not there obviously the house was shut  
2 down. When Mr. Epstein was here probably twice a  
3 week.  
4 Q. Okay. And going back to C.W., how often  
5 would you see her?  
6 A. More often.  
7 Q. More often than T.?  
8 A. Yeah.  
9 Q. If you saw T. twice a week then how often  
10 would you see C.?  
11 A. I will say three to four times.  
12 Q. Per week?  
13 A. Yes.  
14 Q. And do you remember S.R. at all?  
15 A. She goes under another name?  
16 Q. I wouldn't think so.  
17 A. No, I don't remember her.  
18 Q. Okay. And when you would see either T.  
19 or C., in what context would you see them; at  
20 Jeffrey Epstein's house?  
21 A. Yes. C. used to call me.  
22 Q. She used to call you directly?  
23 A. Yeah, no, well, I used to take the  
24 message from her, I clearly remember that, but not  
25 S. or --

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1 Q. T.?  
2 A. T.  
3 Q. When C. would call you what would she  
4 typically say to you?  
5 A. I just looking at some of the messages I  
6 took, that's exactly what it is, I got females for  
7 him.  
8 Q. Okay. And when C. herself would come to  
9 Jeffrey Epstein's house, what would she come there  
10 to do?  
11 MR. CRITTON: Form.  
12 THE WITNESS: I assume they were  
13 massages.  
14 BY MR. EDWARDS:  
15 Q. Okay. You thought that C.W. was a  
16 masseuse?  
17 A. Yes.  
18 Q. Okay. You mentioned earlier you have a  
19 daughter. Right?  
20 A. Yes.  
21 Q. And your daughter is 20?  
22 A. 20, and I have a 16 year old.  
23 Q. C.W. is 21, so back in 2004, 2005, we're  
24 talking about a 15 year old girl.  
25 Is that you thought that the 15 year old

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1 girl was at Jeffrey Epstein's house, just so the  
2 record is clear, to give a massage, you thought  
3 she was a masseuse?  
4 MR. CRITTON: Form.  
5 THE WITNESS: It's hard to answer to say  
6 yes or no. At that time -- let me put it  
7 this way. I saw these girls coming into the  
8 house to have a good time. But I didn't  
9 know or I was not interested if it was going  
10 to be a massage or something else, that was  
11 my opinion. Now, they look young but, I  
12 mean, I never thought they were underage.  
13 BY MR. EDWARDS:  
14 Q. Okay. Do you recall C. when she would  
15 come to the house she actually had braces when she  
16 was visiting Mr. Epstein?  
17 MR. CRITTON: Form.  
18 THE WITNESS: I don't remember that.  
19 BY MR. EDWARDS:  
20 Q. Okay. C. when she was coming over the  
21 house -- I'm using her for an example because it  
22 seems you remember her the best of T., C., and S.  
23 Right?  
24 A. Yes.  
25 Q. It seemed like she was relatively the age

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1 of your daughter?  
2 MR. CRITTON: Form.  
3 THE WITNESS: It's hard to say.  
4 BY MR. EDWARDS:  
5 Q. You wouldn't be shocked to know that she  
6 was the age of your daughter though. Right?  
7 MR. CRITTON: Form.  
8 THE WITNESS: No.  
9 BY MR. EDWARDS:  
10 Q. Okay. And T. the same, I mean, you  
11 wouldn't be surprised if you learned that she was  
12 14, 15, 16 years old going over to Jeffrey  
13 Epstein's house, that doesn't shock you either.  
14 Right?  
15 MR. CRITTON: Form.  
16 THE WITNESS: (Shakes head.)  
17 BY MR. EDWARDS:  
18 Q. For the record, I just need you to answer  
19 out loud.  
20 A. No.  
21 Q. Okay. You mentioned that you knew that  
22 they were coming over, you thought they were  
23 coming over to have a -- I'll use your words, to  
24 have a good time.  
25 What made you believe these girls were

41 (Pages 158 to 161)

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1 coming over to his house to have a good time? And  
 2 then I think you finished by saying I didn't know  
 3 if they were doing massages or something else.  
 4 Just elaborate on that, what did you mean by that?  
 5 MR. CRITTON: Form.  
 6 THE WITNESS: Because they were cheerful,  
 7 they were happy, like any young girl, you  
 8 know, they would listen to I-pods, stuff  
 9 like that. I think they were having a good  
 10 time.  
 11 BY MR. EDWARDS:  
 12 Q. Okay. Other than being cheerful, happy,  
 13 and listening to I-pods, what else do you remember  
 14 about them that indicated to you that they were  
 15 there to have a good time?  
 16 A. I will say that knowing Jeffrey Epstein  
 17 everybody that will met him he was -- because he  
 18 was a reclusive mysterious man, getting to know  
 19 him that close it was like a matter that you're  
 20 going to get advance in life as modeling or acting  
 21 career or something like that. Even so for men  
 22 that used to go there they will have the probably  
 23 doing business with him. Girls like that, the  
 24 girls like including I'm talking about my girls,  
 25 they like danger, so not danger with him but, I

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1 mean, that's my opinion, you know, they were  
 2 having a good time, that's what I can say.  
 3 Q. And when you said you're talking about  
 4 your girl, did that mean for that minute you were  
 5 thinking about your own daughter?  
 6 A. Yes.  
 7 Q. And that she would be impressed by  
 8 somebody like Mr. Epstein?  
 9 MR. CRITTON: Form.  
 10 THE WITNESS: Yes, exactly.  
 11 BY MR. EDWARDS:  
 12 Q. And somebody -- and that was common of  
 13 visitors of Mr. Epstein to be impressed by him and  
 14 hope that he could reward them by modelling or  
 15 something else?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: Yes.  
 18 BY MR. EDWARDS:  
 19 Q. And getting to know him as well as you  
 20 did, did that seem typical of the clientele or  
 21 guests that would visit his house?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: I would say yes.  
 24 BY MR. EDWARDS:  
 25 Q. Okay. And you called him mysterious and

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1 reclusive and obviously you told us about his vast  
 2 wealth. Right?  
 3 A. Yes.  
 4 MR. CRITTON: Form.  
 5 BY MR. EDWARDS:  
 6 Q. Are those characteristics things that you  
 7 believe he used to get people over to his house  
 8 such as these girls, C. and T.?  
 9 MR. CRITTON: Form.  
 10 THE WITNESS: Yes.  
 11 BY MR. EDWARDS:  
 12 Q. Okay. And when C. or T. -- and just so  
 13 that we're not only talking about C. and T., those  
 14 are two of the girls, but there were also many  
 15 other girls that were relatively the same age as  
 16 C. and T. that came over to his house to have a  
 17 good time. Right?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: Can you rephrase that?  
 20 BY MR. EDWARDS:  
 21 Q. Yes. I mean, you told me that T. came  
 22 over roughly twice a week, and C. came over three  
 23 to four times a week. In addition to C. and T., I  
 24 mean, obviously there is other attorneys in this  
 25 room right now that represent other girls, there

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1 were many other girls roughly or approximately the  
 2 same age as you would observe as C. and T. that  
 3 came to his house frequently to have a good time?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: Yes.  
 6 BY MR. EDWARDS:  
 7 Q. During the six month period of time that  
 8 you were there, can you give us your best  
 9 approximation as to the number of girls that would  
 10 come to Jeffrey's house in that age group of C.  
 11 and T. that were there to have a good time?  
 12 MR. CRITTON: Form.  
 13 BY MR. EDWARDS:  
 14 Q. As you've classified it.  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: I would say eight.  
 17 BY MR. EDWARDS:  
 18 Q. There is eight that you remember?  
 19 A. Eight, ten.  
 20 Q. Could be more, could be less?  
 21 MR. CRITTON: Form.  
 22 BY MR. EDWARDS:  
 23 Q. But that's your best approximation?  
 24 A. (Shakes head.)  
 25 Q. Do you have the names of these people

42 (Pages 162 to 165)

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

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

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

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

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Page 170

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

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

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

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

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1 A. Yes.  
 2 Q. Okay. Ever since this communication that  
 3 Ms. Maxwell made to you where she called you  
 4 sometime in May or June of 2005, and have you felt  
 5 threatened?  
 6 A. Yes.  
 7 MR. CRITTON: Form.  
 8 BY MR. EDWARDS:  
 9 Q. Have you felt reluctant to come forward  
 10 and give truthful, honest, and full disclosure of  
 11 all information that you know about this case?  
 12 MR. CRITTON: Form.  
 13 THE WITNESS: I said this off the record  
 14 but I will say it on the record, being in  
 15 the Epstein case for me resulted in two  
 16 years I have -- I won't bring the names but  
 17 I was in the third interview to get hired as  
 18 a household manager in Palm Beach and they  
 19 told me you are the Jeffrey Epstein guy.  
 20 Not in the sense I did something wrong  
 21 because of the scandal, so they shun the job  
 22 away from me. And so I was afraid that --  
 23 this is very powerful people and one phone  
 24 call and you finish, so I'm the little guy.  
 25 Even I'm wearing a tie I'm a -- I'm talking

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1 from my heart. This is the way it is.  
 2 BY MR. EDWARDS:  
 3 Q. I feel for you, I'm sorry that you have  
 4 to be in this position.  
 5 MR. CRITTON: Move to strike this.  
 6 BY MR. EDWARDS:  
 7 Q. Well, when you applied for these jobs and  
 8 they turned you down and gave you the reason that  
 9 you're the person involved in the Jeffrey Epstein  
 10 scandal, was it that they are associated or  
 11 friends with Jeffrey Epstein or is it that you  
 12 have information and you have this confidentiality  
 13 but you're revealing some certain information that  
 14 Mr. Epstein would not like?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: Both.  
 17 BY MR. EDWARDS:  
 18 Q. Both?  
 19 A. Both.  
 20 Q. And since then given what you just told  
 21 us about these people being very powerful, are you  
 22 afraid for your life given the fact that you're  
 23 involved to some extent in this case?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: I just start thinking about

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1 this. Because I went through -- the first  
 2 time I went to the deposition I was in Palm  
 3 Beach and I did my duty, I mean, I tell what  
 4 I know, but now I know there is more  
 5 digging, all I want is this to be to get on  
 6 with my normal life and stuff.  
 7 BY MR. EDWARDS:  
 8 Q. So when you come here today to testify,  
 9 your main objective is to get back to your normal  
 10 life and get out of the spotlight of this case.  
 11 Yes?  
 12 A. Yes.  
 13 Q. And in doing so have you held back some  
 14 of the details that you know about that happened  
 15 in this case to remove yourself from the  
 16 spotlight?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: No, sir.  
 19 BY MR. EDWARDS:  
 20 Q. Okay. Have you ever talked to Ghislaine  
 21 Maxwell after that telephone call where she called  
 22 you and you felt threatened?  
 23 A. No.  
 24 Q. Okay. So going back to where we started  
 25 here was, does Ghislaine Maxwell have knowledge of

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1 the girls that would come over to Jeffrey  
 2 Epstein's house that are in roughly the same age  
 3 group as C. and T. and to have a good time as you  
 4 put it?  
 5 MR. CRITTON: Form.  
 6 THE WITNESS: Yes.  
 7 BY MR. EDWARDS:  
 8 Q. And what was her involvement and/or  
 9 knowledge about that?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: She knew what was going on.  
 12 BY MR. EDWARDS:  
 13 Q. You referred to her at one point in time  
 14 as Jeffrey Epstein's companion. But then later on  
 15 you said that if she flew she flew on a different  
 16 airplane and oftentimes or sometimes she slept in  
 17 a different bed from Mr. Epstein. Did that seem  
 18 unusual to you?  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: It was odd but, I mean, and  
 21 again, everything is odd in Palm Beach.  
 22 BY MR. EDWARDS:  
 23 Q. Okay, I don't mean to laugh.  
 24 A. Mr. Epstein fly to Jet Aviation, she fly  
 25 to Galaxy Aviation, but they never flew the same

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<p style="text-align: right;">Page 178</p> <p>1 plane, I don't know why.</p> <p>2 Q. And did you ever find out why?</p> <p>3 A. No.</p> <p>4 Q. You never really inquired why?</p> <p>5 A. No.</p> <p>6 Q. That wasn't your job?</p> <p>7 A. (Shakes head.)</p> <p>8 Q. You were just there to do your job?</p> <p>9 A. Exactly.</p> <p>10 Q. Obviously at some point in time you see</p> <p>11 these girls coming over to Mr. Epstein's house to</p> <p>12 have a good time and over time you start wondering</p> <p>13 what is going on with Mr. Epstein and these girls.</p> <p>14 Right?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Yes.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. And you understand that Mr. Epstein is a</p> <p>19 wealthy person that could have the best masseuse</p> <p>20 in the world come to his house. Yes?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. These were not professional masseuses</p> <p>25 that were coming to his house to give massages.</p>	<p style="text-align: right;">Page 180</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q. Who heard who?</p> <p>3 A. I heard Sarah going to be coming to give</p> <p>4 a massage.</p> <p>5 Q. Okay. When the girls would come in to</p> <p>6 Mr. Epstein's house, would you be the first one to</p> <p>7 meet them and greet them or would that be Sarah?</p> <p>8 A. Me.</p> <p>9 Q. And if C. came would she normally come</p> <p>10 alone or with somebody else?</p> <p>11 A. Sometimes she had a companion sometimes</p> <p>12 she was by herself.</p> <p>13 Q. Given C.'s age you never truly believed</p> <p>14 she was there as a masseuse; did you?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: From the father point of</p> <p>17 view, no.</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. And that in conjunction with the fact</p> <p>20 that when she called she gives you messages such</p> <p>21 as I have girls to bring for Mr. Epstein lead you</p> <p>22 to believe that there was something more going on</p> <p>23 then massages at Mr. Epstein's house with these</p> <p>24 girls?</p> <p>25 MR. CRITTON: Form.</p>
<p style="text-align: right;">Page 179</p> <p>1 Right?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. They were not?</p> <p>6 MR. CRITTON: Form.</p> <p>7 THE WITNESS: They were not the best but</p> <p>8 they say they were masseuses.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. They said that or Sarah Kellen said that?</p> <p>11 Who is they? Is it Sarah Kellen and Jeffrey</p> <p>12 Epstein or is it C. and T. that would come and</p> <p>13 announce themselves as masseuses?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: We wanted to put the title</p> <p>16 masseuse.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. Who is we?</p> <p>19 A. We the staff and Sarah.</p> <p>20 Q. Who taught you that these girls that are</p> <p>21 in T. and C. age group should be referred to as</p> <p>22 masseuses? Who taught you that title?</p> <p>23 MR. CRITTON: Form.</p> <p>24 THE WITNESS: I just heard them, you</p> <p>25 know.</p>	<p style="text-align: right;">Page 181</p> <p>1 THE WITNESS: When I was working I didn't</p> <p>2 have the time to realize that, but now</p> <p>3 you're out and you start -- yes, it is more</p> <p>4 than that.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. And when C. would come over and she would</p> <p>7 bring a companion, who would lead them to the area</p> <p>8 -- I guess it's the upstairs bedroom, who would</p> <p>9 lead them up there, would it be Sarah or would it</p> <p>10 be yourself?</p> <p>11 MR. CRITTON: Form.</p> <p>12 THE WITNESS: Sarah.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. Let's say two of them come over, I know</p> <p>15 that there is numerous times that she is coming</p> <p>16 three or four times a week for the six month</p> <p>17 period that you're there, but if it is C. and</p> <p>18 another companion, and that other companion would</p> <p>19 usually be roughly her age. Right?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: It was something like that.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. I mean, there were not people bringing</p> <p>24 over massage tables to give him a massage, these</p> <p>25 were girls who were C. and T. age, approximately,</p>



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1 all of them?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: They were not carrying  
 4 massage tables, no.  
 5 BY MR. EDWARDS:  
 6 Q. So when C. and a friend would be lead  
 7 upstairs would they go into the room with Mr.  
 8 Epstein together?  
 9 A. I was not there.  
 10 Q. All right. So that's when you exited to  
 11 the other house?  
 12 A. I escorted them to the kitchen and they  
 13 went through the stairwell upstairs.  
 14 Q. All right. Sometimes you went in after  
 15 the massages to clean up the room. Is that right?  
 16 A. Right, when Mr. Epstein go out of the  
 17 house.  
 18 Q. After he was out of the house?  
 19 A. Yes.  
 20 Q. What other indications besides their age,  
 21 what other indications were there that there was  
 22 something more than a massage going on in the  
 23 room?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: I don't know.

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1 BY MR. EDWARDS:  
 2 Q. Just your fatherly instinct told you  
 3 that; is that it?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: Yes.  
 6 BY MR. EDWARDS:  
 7 Q. And when T. would come over would she  
 8 normally bring others with her?  
 9 A. Usually they came in couples, but  
 10 sometimes I wouldn't say never happened but  
 11 probably they were by themselves.  
 12 Q. Okay. But your feeling was when they  
 13 came in groups was because they felt more  
 14 comfortable in a group?  
 15 A. Yes.  
 16 MR. CRITTON: Form.  
 17 BY MR. EDWARDS:  
 18 Q. Were you ever aware or am I the first to  
 19 tell you that Mr. Epstein would offer them money  
 20 for their services in the bedroom as well as money  
 21 for every single girl that they brought him? Am I  
 22 the first to tell you that?  
 23 MR. CRITTON: Form.  
 24 THE WITNESS: No, I didn't know that.  
 25 BY MR. EDWARDS:

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1 Q. You didn't?  
 2 A. No.  
 3 Q. I'm going to go to the police report that  
 4 we have that mentions your name in it in several  
 5 places. All right. I think the first time that  
 6 we find your name is page 50 at the bottom. This  
 7 is not a transcript of any statement that you gave  
 8 so I want to read some of it and you tell me is  
 9 this accurate or does it accurately reflect what  
 10 you told Detective Recarey. Okay.  
 11 A. Okay.  
 12 MR. CRITTON: Just object to the  
 13 procedure. I think that's improper, if  
 14 you're trying to accredit him it's improper,  
 15 if you're trying to impeach him it's  
 16 improper. But go, do what you want.  
 17 MR. EDWARDS: I said it's not a  
 18 statement. Do you want to give me the  
 19 statement?  
 20 BY MR. EDWARDS:  
 21 Q. Mr. Rodriguez stated he had worked with  
 22 Epstein for approximately six months after the  
 23 previous houseman left. Correct?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: Yes.

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1 BY MR. EDWARDS:  
 2 Q. He stated that it was his responsibility  
 3 to keep the identity of the masseuses private.  
 4 A. Yes.  
 5 MR. CRITTON: Form.  
 6 BY MR. EDWARDS:  
 7 Q. And is that something that you told Mr.  
 8 -- Detective Recarey that it was your  
 9 responsibility to keep the identity of the  
 10 masseuses private?  
 11 A. That was part of my job.  
 12 Q. Who delegated that particular  
 13 responsibility, is that Sarah Kellen or Jeffrey  
 14 Epstein?  
 15 A. Sarah Kellen.  
 16 Q. What specifically did she tell you about  
 17 keeping the identity of the masseuses private?  
 18 A. Everything in the house was confidential.  
 19 And we didn't -- several times, you know, whatever  
 20 was going on in the house Sarah told me, you know  
 21 you're not suppose to say this, we know because I  
 22 signed 27 pages of confidentiality agreement.  
 23 Q. The confidentiality agreement that you  
 24 referred to earlier was 27 pages long?  
 25 A. Yes, something like that.

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1 Q. You've worked for other people in a  
 2 similar fashion in terms of being a housekeeper.  
 3 Right?  
 4 A. Yes.  
 5 Q. And with each of those people did you  
 6 have to sign a confidentiality agreement?  
 7 A. No.  
 8 Q. That's something that only applied to  
 9 your position with Jeffrey Epstein?  
 10 A. Yes.  
 11 Q. Who did you work for? I'm going to come  
 12 back to this. Who did you work for just prior to  
 13 Mr. Epstein?  
 14 A. Mr. Arturo Torres in Fisher Island.  
 15 MR. EDWARDS: Do you need a spelling?  
 16 THE WITNESS: T-O-R-R-E-S.  
 17 BY MR. EDWARDS:  
 18 Q. Okay. Did you have to sign a  
 19 confidentiality agreement with him?  
 20 A. No.  
 21 Q. Were your duties fairly similar?  
 22 A. Same thing.  
 23 Q. Manage the house?  
 24 A. Yes, sir.  
 25 Q. This is another wealthy person that

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1 needed someone to manage the house?  
 2 A. Yes.  
 3 Q. And how long did you work for him?  
 4 A. Four years and two different occasions.  
 5 Q. One in Fisher Island?  
 6 A. One in Fisher Island, the other one in  
 7 his ranch in Texas.  
 8 Q. Why did you leave him and start with Mr.  
 9 Epstein?  
 10 A. His health declined and he didn't need  
 11 anybody like me so he moved back to Spain, he came  
 12 once in awhile, I used to take care of his car,  
 13 and then finally he passed away two years ago.  
 14 Q. After you were relieved of your duties  
 15 with Mr. Epstein where is the next place where you  
 16 were employed?  
 17 A. I worked for Sidney Goldman, a gentleman  
 18 in Fort Lauderdale, a wealthy individual also, he  
 19 was in his 80's, and I did some functions.  
 20 Q. Okay. How long did you work for him?  
 21 A. Probably six months.  
 22 Q. And why did you stop there?  
 23 A. Because he also 83 or 84 at the time and  
 24 they start reducing staff. He used to go out, he  
 25 didn't need a chauffeur so they slash one of my

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1 duties and then I started work for Mrs. Hammond.  
 2 Q. And where was that?  
 3 A. In Palm Beach.  
 4 Q. How long did you work there?  
 5 A. For Mrs. Hammond on and off for two or  
 6 three years.  
 7 Q. In any of those other places did any of  
 8 the people that you worked for ever get massages  
 9 at their house?  
 10 A. Yes.  
 11 Q. Which of those people?  
 12 A. Mrs. Hammond.  
 13 Q. And who would usually give the massages  
 14 at her house?  
 15 A. She would call somebody from West Palm  
 16 Beach.  
 17 Q. And did you see the masseuse that would  
 18 show up?  
 19 A. Yes.  
 20 Q. Male or female?  
 21 A. Female.  
 22 Q. And what age group was that masseuse?  
 23 A. Actually she was older, 40's.  
 24 Q. Did she bring a massage table or was  
 25 there one in the house?

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1 A. There was one in the house.  
 2 Q. There was one?  
 3 A. Yeah.  
 4 Q. And what about that person told you that  
 5 that is a legitimate masseuse when they showed up  
 6 at Ms. Hammond's house?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: Nothing, just maybe  
 9 Ms. Hammond tried it the first time and she  
 10 liked it, you know, nothing indicated to me,  
 11 I didn't see her license or anything.  
 12 BY MR. EDWARDS:  
 13 Q. Was this specific responsibility that  
 14 we're talking about your responsibility to keep  
 15 the identity of the masseuses private, was that  
 16 something that Sarah Kellen told you more than  
 17 once after you signed the confidentiality  
 18 agreement?  
 19 A. I believe so.  
 20 Q. And why would that subject matter come up  
 21 to where she would need to reiterate that?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: Maybe for directions from  
 24 the boss.  
 25 MR. CRITTON: Move to strike a guess.

48 (Pages 186 to 189)

Page 190

1 BY MR. EDWARDS:  
 2 Q. When you were at his house, I think you  
 3 said earlier that he would get one or two massages  
 4 everyday he was there. Is that right?  
 5 A. Yes.  
 6 Q. And each of the massages, just so we're  
 7 clear, that you're talking about are given by the  
 8 girls that are in the age group of C. and T. that  
 9 were at his house to have fun. Right?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: I didn't know who was  
 12 giving the massages but obviously the  
 13 massages was going on. But I don't know how  
 14 to answer your question. I don't know if  
 15 these girls giving the massage itself.  
 16 BY MR. EDWARDS:  
 17 Q. No, no, no. You're misunderstanding my  
 18 question, or I'm just not communicating well with  
 19 you.  
 20 I'm not saying there was a massage or not  
 21 a massage going on. I'm saying that you were  
 22 taught to label these girls as masseuses. Right?  
 23 A. Yes.  
 24 MR. CRITTON: Form.  
 25 BY MR. EDWARDS:

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1 Q. And when we're talking about these girls,  
 2 we are talking about the group of girls that would  
 3 come to his house that are roughly in the age  
 4 group of C. and T. Right?  
 5 MR. CRITTON: Form.  
 6 THE WITNESS: More or less.  
 7 BY MR. EDWARDS:  
 8 Q. We're not talking about some professional  
 9 massage service that would show up at his house to  
 10 give a massage, that's not what we're talking  
 11 about. Right?  
 12 MR. CRITTON: Form.  
 13 THE WITNESS: It's hard to say. It's  
 14 hard to say because there are young  
 15 masseuses too. It's hard to say.  
 16 BY MR. EDWARDS:  
 17 Q. Well, you testified that some of them  
 18 would show up in taxicabs. Right?  
 19 A. Yeah.  
 20 Q. That's a little odd for a masseuse.  
 21 Right?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: (Shakes head.)  
 24 BY MR. EDWARDS:  
 25 Q. I mean, that's one indication that this

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1 is not a professional masseuse that's showing up  
 2 at his house, they're showing up in a taxicab.  
 3 Right?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: Yes.  
 6 BY MR. EDWARDS:  
 7 Q. So that's something else that you as  
 8 somebody who has common sense had told you that  
 9 these are young girls that are at his house to  
 10 have fun and that has very little, if anything, to  
 11 do with a massage.  
 12 MR. CRITTON: Form.  
 13 BY MR. EDWARDS:  
 14 Q. Right?  
 15 MR. CRITTON: Form, argumentative.  
 16 THE WITNESS: In fairness it's hard to  
 17 say.  
 18 BY MR. EDWARDS:  
 19 Q. What was going on behind closed doors?  
 20 A. Exactly.  
 21 Q. Why earlier did you say you had the  
 22 feeling that there was something more going on  
 23 than a masseuse?  
 24 A. In terms of fun. You don't know if it's  
 25 -- I have to say this. Some of this lawsuit is

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1 because forceful violation or something of a girl,  
 2 I mean a rape. Okay. So it's hard to say if it  
 3 was nothing except having fun.  
 4 MR. CRITTON: Let me put an objection in,  
 5 move to strike, I'm not sure what that was  
 6 responsive to.  
 7 BY MR. EDWARDS:  
 8 Q. We're talking about a time period when  
 9 Mr. Epstein is 50 years old plus, and we're  
 10 talking about these girls coming over to his house  
 11 that are 14, 15, or 16 years old, and you're  
 12 categorization is they're just there to have fun.  
 13 Right?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: Is that what you asked me?  
 16 BY MR. EDWARDS:  
 17 Q. Yes.  
 18 A. Yes.  
 19 Q. Okay. And that in your mind was okay or  
 20 that was strange or that was it's none of my  
 21 business?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: I have to say yes or no or  
 24 I have to give my opinion on that?  
 25 BY MR. EDWARDS:

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<p style="text-align: right;">Page 194</p> <p>1 Q. Sure, go ahead and answer however you 2 want. 3 MR. CRITTON: Form. 4 THE WITNESS: I don't think it was right. 5 BY MR. EDWARDS: 6 Q. Did you ever voice that opinion that you 7 didn't think that it was right that these young 8 girls were over behind closed doors upstairs with 9 Mr. Epstein in his bedroom? 10 MR. CRITTON: Form. 11 THE WITNESS: I been asked that question 12 before. 13 BY MR. EDWARDS: 14 Q. Excuse me? 15 A. I been asked that question before. 16 Q. By whom? 17 A. Palm Beach Police Department. 18 Q. Did you give the same answer that you did 19 not think it was right? 20 MR. CRITTON: Form. 21 THE WITNESS: Yes. 22 BY MR. EDWARDS: 23 Q. And what about it to you aside from the 24 fact that you had a daughter roughly the same age, 25 what besides that told you that it wasn't right?</p>	<p style="text-align: right;">Page 196</p> <p>1 A. No, exactly. 2 MR. CRITTON: Form. 3 BY MR. EDWARDS: 4 Q. I think that the next time you're 5 mentioned in the report, I believe it's page 70. 6 MS. EZELL: Off the record briefly. 7 (Thereupon, a discussion was had off the 8 record.) 9 BY MR. EDWARDS: 10 Q. Page 64. It says, Alfredo Rodriguez 11 resides in Miami had eluded, meaning you were 12 trying to evade or avoid service of process 13 servers previously and was not served the 14 investigative subpoena. 15 This is an investigator saying you just 16 weren't home or something. Right? 17 A. But I never elude anybody. 18 Q. You never intentionally tried to avoid 19 the police officers? 20 A. No, no, never. 21 Q. Okay. 22 MR. CRITTON: So much for the police 23 report. 24 BY MR. EDWARDS: 25 Q. All right. The bottom of page 70 says, I</p>
<p style="text-align: right;">Page 195</p> <p>1 MR. CRITTON: Form. 2 THE WITNESS: Ask me your question again. 3 BY MR. EDWARDS: 4 Q. My question is, why is it your opinion 5 that it wasn't right for these young girls to be 6 up in Mr. Epstein's -- 7 A. It wasn't. 8 MR. CRITTON: Form. 9 BY MR. EDWARDS: 10 Q. It wasn't right? 11 A. It wasn't. 12 Q. And why not? 13 MR. CRITTON: Form. 14 THE WITNESS: Because I'm a father, I 15 have two daughters. 16 BY MR. EDWARDS: 17 Q. And given Mr. Epstein's wealth and power 18 and influence, is that something that you as a 19 father could have seen your daughters doing at 20 that age? 21 MR. CRITTON: Form. 22 THE WITNESS: I don't think that my 23 daughters would be doing that. 24 BY MR. EDWARDS: 25 Q. You would hope not.</p>	<p style="text-align: right;">Page 197</p> <p>1 brought Mr. Rodriguez to the interview room. 2 Were you taken to an interview room, to a 3 room in the police department? 4 A. This was in the District Attorney's 5 Office. 6 Q. Oh, it was at the State Attorney's 7 Office? 8 A. Yes. 9 Q. Okay. Was a State Attorney there as 10 well? 11 A. Yes, Mrs. Weiss. 12 Q. Daliah Weiss? 13 A. Young lady, Weiss. D-E-I-S-S. 14 Q. Okay. I have D-A-L-I-A-H, Daliah Weiss, 15 W-E-I-S-S. 16 A. Yes. 17 Q. That's her? 18 A. Yeah. 19 Q. Okay. Did she ask you any questions? 20 A. Both of them. 21 Q. Okay. So it was both -- if there is a -- 22 I think you said earlier there is a taped 23 statement, there is a tape of this? 24 A. Yes. 25 Q. If we listen to that tape if we ever get</p>

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

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

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

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

51 (Pages 198 to 201)



Page 202

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

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

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

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

52 (Pages 202 to 205)



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1 now, you know. It's a fine line, you know.  
 2 Q. Okay. You didn't ask their ages?  
 3 A. No.  
 4 Q. And these are the masseuses where you  
 5 were told to keep their identities private anyway?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: Yes.  
 8 BY MR. EDWARDS:  
 9 Q. Rodriguez stated they would eat tons of  
 10 cereal and drink milk all the time. Is that true?  
 11 MR. CRITTON: Form.  
 12 THE WITNESS: Yes.  
 13 BY MR. EDWARDS:  
 14 Q. So the masseuses would come over and  
 15 either before or after going up to Mr. Epstein's  
 16 bedroom they would go to the kitchen and eat  
 17 cereal and milk?  
 18 A. And ice cream.  
 19 Q. That's what the kids would eat?  
 20 A. (Shakes head.)  
 21 Q. Yes?  
 22 A. Yes.  
 23 MR. CRITTON: Let me object to the form  
 24 of the last question.  
 25 BY MR. EDWARDS:

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1 Q. Rodriguez stated the girls that would  
 2 come appeared to be too young to be masseuses.  
 3 Is that something you agree with?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: Some of them, you know.  
 6 BY MR. EDWARDS:  
 7 Q. Especially when we're talking about C.  
 8 and T, those girls, they appeared to be too young  
 9 to be masseuses. Right?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: Yes.  
 12 BY MR. EDWARDS:  
 13 Q. He stated one time under Epstein's  
 14 direction he delivered a dozen roses to Royal Palm  
 15 Beach High School for one of the girls that came  
 16 to provide a massage.  
 17 And that is the -- that is the girl that  
 18 we talked about earlier, A.?  
 19 A. Yes.  
 20 Q. Okay. And that's a girl who also came  
 21 over to Mr. Epstein's house and was one of the  
 22 girls who was up in the bedroom privately with Mr.  
 23 Epstein at times. Right?  
 24 A. I never see them upstairs.  
 25 MR. CRITTON: Form.

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1 THE WITNESS: But he was in the house.  
 2 BY MR. EDWARDS:  
 3 Q. Okay. You don't know why she was there?  
 4 A. Honestly the truth, you know, I cannot  
 5 say, they all came for the same motive but --  
 6 Q. To have fun?  
 7 A. To have fun.  
 8 MR. CRITTON: Form.  
 9 BY MR. EDWARDS:  
 10 Q. Okay. Let me try to figure this out  
 11 then. They all came over in your mind to have  
 12 fun.  
 13 Did you ever see any contact between  
 14 Epstein, Mr. Epstein, and any of these girls other  
 15 than whatever contact he was having with them in  
 16 the bedroom?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: No, no.  
 19 BY MR. EDWARDS:  
 20 Q. Okay. So when you say they came over to  
 21 have fun, you're talking about whatever fun was  
 22 going on behind closed doors in the bedroom?  
 23 MR. CRITTON: Form.  
 24 THE WITNESS: They go to the pool during  
 25 the daytime.

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1 BY MR. EDWARDS:  
 2 Q. Without Mr. Epstein?  
 3 A. With Mr. Epstein.  
 4 Q. He would go with them?  
 5 A. (Shakes head.)  
 6 Q. Do you ever remember C. or T. or A.  
 7 going to the pool with Mr. Epstein?  
 8 A. The pool was used everyday, so probably  
 9 they were there, but I cannot -- I cannot say yes,  
 10 I saw her, you know.  
 11 Q. So you know that some of these girls who  
 12 were -- who you labelled as masseuses that were  
 13 very young in age came over to the house and they  
 14 oftentimes used the swimming pool area but you  
 15 can't say that any of those girls were C. or T.  
 16 or A.?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: No, because when they were  
 19 at the pool it was off limits for any of the  
 20 staff.  
 21 BY MR. EDWARDS:  
 22 Q. Why is that? Is that in the rule book?  
 23 A. No, because they were naked. Louella  
 24 told me to leave them alone, so until they leave  
 25 the area we couldn't go, so we couldn't -- I

53 (Pages 206 to 209)

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1 didn't see nothing, you know.  
 2 Q. How do you know they were naked?  
 3 A. Because Louella told me one time.  
 4 MR. CRITTON: Move to strike, predicate  
 5 with regard to his last testimony.  
 6 BY MR. EDWARDS:  
 7 Q. How do you know that the young girls that  
 8 would come over that were labelled as masseuses  
 9 were naked in the swimming pool area?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: How do I know, because  
 12 Louella spot them or one other time the girl  
 13 who takes care of the pool say, Alfredo,  
 14 I'll come back tomorrow because they are  
 15 playing around here and doing this, I mean,  
 16 naked.  
 17 BY MR. EDWARDS:  
 18 Q. Just naked or doing something more?  
 19 A. No, naked, naked.  
 20 Q. And who was the girl who takes care of  
 21 the pool?  
 22 A. I forgot, I don't remember.  
 23 Q. Well, there was a point in time where I  
 24 sent interrogatories which are questions under  
 25 oath to Mr. Epstein in this case and I asked

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1 specifically what is the current name, address,  
 2 and telephone number of each person that resided  
 3 or worked within the home located at 358 El Brillo  
 4 Way, West Palm Beach, between 2001 to the present.  
 5 The answer was -- and just so the record  
 6 is very clear in terms of what the answer was  
 7 talking about, plaintiff's complaint alleges a  
 8 time period of approximately August 2002 and  
 9 continuing until approximately September 2005, so  
 10 the answer is within that time period of 2002 and  
 11 2005.  
 12 I'm going to list -- I'm going to tell  
 13 you all the names that were provided to me and you  
 14 tell me if any of these people is that person that  
 15 we're talking about who maintained the pool.  
 16 Okay?  
 17 A. No.  
 18 Q. Ryan Dionne?  
 19 A. No.  
 20 Q. David Mullen?  
 21 A. No.  
 22 Q. Brent Tindall?  
 23 A. No.  
 24 Q. Mark Tafoya?  
 25 A. (Shakes head.)

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1 Q. Do you know any of these people that I'm  
 2 telling you?  
 3 A. I don't remember.  
 4 Q. Okay.  
 5 A. She's a female, what I'm talking about,  
 6 the pool taker.  
 7 Q. Okay. Janusz Banasiak?  
 8 A. Could be.  
 9 Q. I believe that that's a male but I'm not  
 10 sure.  
 11 A. I don't remember.  
 12 Q. It lists house manager, I don't know that  
 13 that would be somebody you'd categorize as a house  
 14 manager but --  
 15 A. What's the name?  
 16 Q. Janusz Banasiak?  
 17 A. (Shakes head.)  
 18 Q. Michael and Rosalie Friedman?  
 19 A. Yes, Michael Friedman was before me.  
 20 Q. Okay. Is Rosalie Friedman the lady that  
 21 you're referring to that cleaned the pool?  
 22 A. No.  
 23 Q. Louella Rabuyo?  
 24 A. Louella is still there, I hired her, the  
 25 housekeeper.

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1 Q. Is that somebody who would provide  
 2 information as to what was going on in this house?  
 3 A. Could be.  
 4 Q. Is that somebody who would also have had  
 5 to sign this confidentiality agreement?  
 6 A. Yes.  
 7 Q. And in addition to you signing this  
 8 confidentiality agreement is that an agreement  
 9 that you know all of the staff working with  
 10 Jeffrey Epstein had to sign?  
 11 MR. CRITTON: Form.  
 12 THE WITNESS: Yes.  
 13 BY MR. EDWARDS:  
 14 Q. So anybody that was hired and worked at  
 15 this house has had to sign this confidentiality  
 16 agreement?  
 17 A. Yes.  
 18 Q. And are you aware of anybody other than  
 19 Mr. Epstein having access to this confidentiality  
 20 agreement?  
 21 A. Ghislaine Maxwell.  
 22 Q. Ghislaine Maxwell. Okay. Alfredo  
 23 Rodriguez, you made the list. Michael Liffman?  
 24 A. Michael, yeah, I think he was before  
 25 Friedman.

54 (Pages 210 to 213)

Page 214

1 Q. Okay. Adriana Ross?  
 2 A. There were two house managers in one year  
 3 prior to me.  
 4 Q. Do you know what Adriana Ross's position  
 5 was at the house?  
 6 A. No.  
 7 Q. There is only a few more names.  
 8 Brahakmana Mellawa and -- I can't even pronounce  
 9 it. Mr. and Mrs. Mellawa?  
 10 A. Yeah, they are from Bangladesh, they were  
 11 the couple taking care --  
 12 Q. That's the couple you referred to earlier  
 13 from Bangladesh?  
 14 A. Yes.  
 15 Q. And Sarah Kellen. And Juan and Maria  
 16 Alessi?  
 17 A. Joe Alessi.  
 18 Q. Do you still speak to any of those  
 19 people?  
 20 A. No. When I was there there was some mail  
 21 that arrive so I contact them and say I have some  
 22 mail, but other than that, no.  
 23 Q. Okay. Do you know how to get in touch  
 24 with any of these people?  
 25 A. They're in the area. Joe Alessi has

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1 apartments there.  
 2 Q. The lady that you're referring to that at  
 3 some point in time saw these kids naked by the  
 4 pool --  
 5 A. Louella.  
 6 MR. CRITTON: Form.  
 7 BY MR. EDWARDS:  
 8 Q. But was there another girl who was in  
 9 charge of cleaning the pool?  
 10 A. No, no, the pool lady was a contractor  
 11 from outside, she used to park the truck outside,  
 12 and when she see that they're there she will tell  
 13 me, Alfredo, I'll come back tomorrow because --  
 14 Q. Were you familiar with another husband  
 15 and wife that worked there, Patrick and Eve?  
 16 A. Yeah, I believe so, Patrick, yeah.  
 17 Q. And did he work there the same time you  
 18 worked there?  
 19 A. No, before me.  
 20 Q. And do you know why they left?  
 21 A. I think everybody quit because of the  
 22 hectic schedule, you know, to be honest with you,  
 23 but I don't know.  
 24 Q. All right. But of the names that I  
 25 listed is there anybody else that you remember

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1 that worked for Mr. Epstein or at that house?  
 2 A. Jerome the gardener.  
 3 Q. Okay.  
 4 A. Jerome Pierre and the staff from New  
 5 York. Once in awhile, Doug Shadow, he was the  
 6 architect who used to come in in charge of  
 7 renovation.  
 8 Q. What about Nicole Hess?  
 9 A. No.  
 10 Q. You don't know who that is. All right.  
 11 The exhibit that I believe is number one right now  
 12 which is this message pad, there are numerous  
 13 messages that have your initials, AR. But there  
 14 are also messages that are on the same pad  
 15 which --  
 16 MR. CRITTON: What date are you looking  
 17 at?  
 18 BY MR. EDWARDS:  
 19 Q. The very last day of this compilation  
 20 1/30/05 and 2/2/05.  
 21 A. These three are not my writing.  
 22 Q. That's what I was going to ask you. This  
 23 is a message pad that was in the house. Right?  
 24 A. In the house, yes.  
 25 Q. So you would think that the person that

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1 made that signature whoever that person is was  
 2 also in the house. Right?  
 3 A. Yes.  
 4 Q. Who possibly would that be with the J.,  
 5 it's just a J.?  
 6 A. I don't know.  
 7 Q. When you sat down today I remember you  
 8 making a statement that something to the effect  
 9 of, and I'm going to paraphrase, can you believe  
 10 that they pulled these message pads out of the  
 11 trash. Do you remember saying that?  
 12 A. Yes.  
 13 Q. How did you learn that they pulled the  
 14 message pads from the trash?  
 15 A. Because it was in the Palm Beach Daily  
 16 News.  
 17 Q. You read it in the paper?  
 18 A. Yes.  
 19 Q. So in addition to Googling the various  
 20 people that were friends of Mr. Epstein you've  
 21 kept up with what's going on in the investigation?  
 22 A. Yeah, because it was my job so I'm  
 23 working next door to this other lady and I want to  
 24 know, it was in the news, you know, it's like a --  
 25 MR. EDWARDS: All right. I have a lot to

55 (Pages 214 to 217)

<p style="text-align: right;">Page 218</p> <p>1 go but we can take a break.</p> <p>2 THE VIDEOGRAPHER: We're off the record.</p> <p>3 (Thereupon, a recess was had.)</p> <p>4 THE VIDEOGRAPHER: We're back on the</p> <p>5 record, tape number five.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. I stopped with knew the girls -- sorry.</p> <p>8 I stopped with the sentence in the police</p> <p>9 report, page 71, he delivered a dozen roses to</p> <p>10 Royal Palm Beach High School.</p> <p>11 And that's something you told us about</p> <p>12 earlier. Right?</p> <p>13 A. Yes.</p> <p>14 Q. Then it says, he knew the girls were</p> <p>15 still in high school and were of high school age.</p> <p>16 Speaking of the girls who were coming</p> <p>17 over labelled as masseuses, is that something --</p> <p>18 (Thereupon, an interruption was had.)</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. The statement is, he knew the girls were</p> <p>21 still in high school and were of high school age.</p> <p>22 That's something you agree with?</p> <p>23 MR. CRITTON: Form, out of context.</p> <p>24 THE WITNESS: I saw them in high school.</p> <p>25 BY MR. EDWARDS:</p>	<p style="text-align: right;">Page 220</p> <p>1 there was more going on than just massages with</p> <p>2 anybody else that worked at the house?</p> <p>3 A. No.</p> <p>4 Q. Did you talk about that with anybody</p> <p>5 else?</p> <p>6 A. No, nothing. This is the first time that</p> <p>7 I said this openly because I was subpoenaed and</p> <p>8 there were these things, you know.</p> <p>9 Q. Right. And right now is the second time</p> <p>10 you said it openly because you're subpoenaed</p> <p>11 again?</p> <p>12 A. Yes.</p> <p>13 MR. CRITTON: Form.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. Otherwise you have not expressed those</p> <p>16 feelings to anybody else?</p> <p>17 A. No.</p> <p>18 Q. What about when you spoke with Mr.</p> <p>19 Epstein's attorneys or investigators, did you talk</p> <p>20 to them about that?</p> <p>21 A. No.</p> <p>22 Q. And why did you choose not to tell them</p> <p>23 that you felt there were more -- that there was</p> <p>24 more going on in the bedroom with these young</p> <p>25 girls than just massages?</p>
<p style="text-align: right;">Page 219</p> <p>1 Q. The girls that we were talking about, and</p> <p>2 I'm talking about C. and T. specifically, but</p> <p>3 these are girls that looked of high school age to</p> <p>4 you.</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: It's hard to say.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. That wouldn't shock you though?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: No.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. Doesn't surprise you?</p> <p>13 A. No.</p> <p>14 MR. CRITTON: Form.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q. I asked Rodriguez about the massages, he</p> <p>17 felt there was a lot more going on than just</p> <p>18 massages.</p> <p>19 Is that something you told him?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. Do you know if it was a feeling that --</p> <p>24 well, let me ask you this way.</p> <p>25 Did you ever talk about that feeling that</p>	<p style="text-align: right;">Page 221</p> <p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: The only reason I contacted</p> <p>3 the attorneys was to see what's my position</p> <p>4 because I didn't have money to go to an</p> <p>5 attorney myself.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. Why would you feel like you may need an</p> <p>8 attorney though if you didn't do anything wrong?</p> <p>9 A. I didn't need an attorney.</p> <p>10 Q. You were just frightened by the process?</p> <p>11 A. The process and the people who was</p> <p>12 involved in this.</p> <p>13 Q. The people involved meaning Ghislaine</p> <p>14 Maxwell and Jeffrey Epstein?</p> <p>15 MR. CRITTON: Form.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. I'll ask you, which people are you</p> <p>18 talking about?</p> <p>19 A. Ghislaine Maxwell.</p> <p>20 Q. And were you still frightened because of</p> <p>21 the threat that she --</p> <p>22 A. I don't think so now, you know, I'm</p> <p>23 protected because I'm doing this publicly.</p> <p>24 Q. Okay. Well, going back to my other</p> <p>25 question about why didn't you reveal to Mr.</p>

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1 Epstein's investigators that you felt there was  
2 more going on in the bedroom than just massages?

3 MR. CRITTON: Form.

4 THE WITNESS: Because they were more  
5 interested in how much I know, they didn't  
6 ask me anything else, and I told them  
7 exactly what I knew and what I was doing.

8 BY MR. EDWARDS:

9 Q. Okay. You were asked by Mr. Mermelstein  
10 when he was asking you about the meeting with Mr.  
11 Epstein's investigators he said, did they make any  
12 threat or did they threaten you, and you paused  
13 and said I don't believe so.

14 A. Yeah, I think they didn't tell me  
15 anything that I will feel -- they told me that  
16 they want to know what I know and if I need an  
17 attorney.

18 Q. Okay. Did you find that strange at all  
19 that they offered you an attorney?

20 A. I went to have dinner at my house and I  
21 told this to my wife and she told me, Alfredo, you  
22 don't need an attorney, so I called him the next  
23 day and that was it.

24 Q. You called the investigators?

25 A. Yes. I declined, I don't need an

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1 attorney.

2 Q. If we want to know the exact names of the  
3 investigators that you met at Don Shula's and at  
4 your house, how would we get that information, do  
5 you have it somewhere?

6 A. Probably I have it in the house.

7 Q. So if we do have to come back here and  
8 finish this up, the next time would you be able to  
9 bring that?

10 A. I think so.

11 Q. Okay. Do you know where in your house  
12 that you have it, I mean, have you kept it in a  
13 certain place?

14 A. I have to look.

15 Q. All right. After the sentence that we  
16 left off it says, he, speaking of Mr. Rodriguez,  
17 would clean Mr. Epstein's bedroom after the  
18 alleged massages and would discover massagers  
19 slash vibrators and sex toys scattered on the  
20 floor.

21 Can you tell us what types of sex toys  
22 that you found scattered on the floor after the  
23 massages with these young girls?

24 MR. CRITTON: Form.

25 THE WITNESS: Like I explain, there was a

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1 massage with a handle with two rubber things  
2 that you can do massage yourself, this was  
3 always on the floor, maybe one or two.

4 BY MR. EDWARDS:

5 Q. Okay. When you say this is always on the  
6 floor, do you mean 24 hours a day it's on the  
7 floor?

8 A. No, no, no, after each massage. Because  
9 I assume the masseuses or anybody they were doing,  
10 they were taken out of the closet wherever they  
11 belong and they would leave there. So Louella and  
12 myself, we always find this on the floor.

13 Q. And this is a massager that belongs to or  
14 is owned by Mr. Epstein?

15 A. Yes.

16 Q. This isn't something that these girls  
17 would bring over to the house?

18 A. No, no, it's in the house, it's part of  
19 the inventory.

20 Q. And that statement is a few statements  
21 after you felt that there was a lot more going on  
22 than just massages, is there something about that  
23 object being left on the ground and the type of  
24 object that it was that also lead you to believe  
25 that there is something more going on here than

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1 just massages?

2 MR. CRITTON: Form.

3 THE WITNESS: Yes.

4 BY MR. EDWARDS:

5 Q. What about it, just tell us?

6 MR. CRITTON: Form.

7 THE WITNESS: I thought they were having  
8 a good time, I never thought it was  
9 something done against anybody's will, but  
10 of course, you know that it's more than  
11 massage.

12 BY MR. EDWARDS:

13 Q. Right, I'm just asking you to explain how  
14 you know that.

15 MR. CRITTON: Let me just move to strike  
16 his last answer as speculation. Form as to  
17 your statement.

18 THE WITNESS: You're 50 years old and  
19 it's -- you're an old -- you know, it's just  
20 instinct.

21 MR. CRITTON: Move to strike.

22 BY MR. EDWARDS:

23 Q. It was obvious to you?

24 A. Yes.

25 MR. CRITTON: Form.



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1 BY MR. EDWARDS:  
 2 Q. He also said he would wipe down the  
 3 vibrators and sex toys and put them away in the  
 4 armoire.  
 5 MR. CRITTON: Form.  
 6 THE WITNESS: These things have a tip,  
 7 they have the cream, they have all kinds of  
 8 cream for giving massage.  
 9 BY MR. EDWARDS:  
 10 Q. How many of these massagers or vibrators  
 11 would you wipe down?  
 12 MR. CRITTON: Form.  
 13 THE WITNESS: This big one all the time.  
 14 BY MR. EDWARDS:  
 15 Q. Right. Other than the big one all the  
 16 time did you wipe down at any time any of the  
 17 other sex toys or vibrators?  
 18 A. No.  
 19 MR. CRITTON: Form.  
 20 BY MR. EDWARDS:  
 21 Q. So if there were any other sex toys or  
 22 vibrators or I believe you used the term dildo  
 23 earlier that were ever used, those are items that  
 24 you did not find on the floor and were put away in  
 25 the armoire?

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1 MR. CRITTON: Form.  
 2 THE WITNESS: Louella told me I did this,  
 3 I did that.  
 4 BY MR. EDWARDS:  
 5 Q. So tell us what did Louella tell you?  
 6 A. She find toys on the floors, she have to  
 7 clean them.  
 8 Q. Did she tell you when she found the toys  
 9 on the floor?  
 10 A. After his massages, you know.  
 11 Q. With the young girls that we're talking  
 12 about?  
 13 A. Yes.  
 14 Q. Okay. And when did Louella tell you  
 15 that?  
 16 A. Almost every other time when she found  
 17 it, you know, Alfredo I found this thing again  
 18 because she despised to clean this, she had to put  
 19 the gloves or whatever.  
 20 Q. Okay. So it sounds like you had an  
 21 actual conversation about this where she's  
 22 describing she doesn't want to clean it.  
 23 A. Because I told her to tell me up to date  
 24 on things that are not normal, so she told me, you  
 25 know, I found this, I found that, or some

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1 underwear she brought it to the laundry and we  
 2 used to label it.  
 3 Q. Just so that the record is clear as to  
 4 what we're talking about with this and that, I  
 5 want you to tell us what Louella would tell you  
 6 specifically, I found this and then would she show  
 7 you what it was?  
 8 A. No, she didn't show me, she said I  
 9 cleaned this and I put it away, it was a vibrator.  
 10 Q. Did she describe the vibrator for you so  
 11 that you knew which one she was talking about?  
 12 A. The vibrator that a female would use for  
 13 personal use.  
 14 Q. Not the same long one that you've been  
 15 describing?  
 16 A. No.  
 17 Q. One that is a penis shaped vibrator.  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: Yes.  
 20 BY MR. EDWARDS:  
 21 Q. That's what she was talking about?  
 22 A. Yes.  
 23 Q. And did she tell you on how many  
 24 occasions after these --  
 25 A. Several times.

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1 Q. And can you explain to us why it is that  
 2 -- and maybe it's just I don't understand the  
 3 process of cleaning the room who went in first and  
 4 second and whatever, but my question is why is it  
 5 that she would always be the one to encounter the  
 6 penis shaped vibrators and you would encounter  
 7 this other longer vibrator?  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: Because it was her job to  
 10 clean the room. When she was busy she will  
 11 ask me, Alfredo, can you help me carry, I  
 12 have a lot of towels, because there were  
 13 mountains because being an older woman I  
 14 help her carry to the -- and put the towels  
 15 downstairs, take it to the laundry. But she  
 16 told me I found these things, I clean it, I  
 17 put it in that armoire, they're over there.  
 18 So she will give me -- we used to  
 19 communicate all those little details, but it  
 20 was her job to be in the room first.  
 21 BY MR. EDWARDS:  
 22 Q. And what did she say about liking or  
 23 disliking the fact that she had to clean these  
 24 vibrators?  
 25 A. She didn't like to clean those.

58 (Pages 226 to 229)



<p style="text-align: right;">Page 230</p> <p>1 Q. Did she tell you why?</p> <p>2 A. Because, you know, she knew what they</p> <p>3 were for and probably she despised to clean</p> <p>4 objects.</p> <p>5 Q. Did she ever make any comments about how</p> <p>6 young the girls were that were in the room with</p> <p>7 Mr. Epstein just before she had to go in and clean</p> <p>8 these vibrators?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: No.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. Is the age of the girls that were coming</p> <p>13 over and going behind closed doors with Mr.</p> <p>14 Epstein a subject that ever came up between you</p> <p>15 and Louella?</p> <p>16 A. Sometimes.</p> <p>17 Q. And what would the conversation consist</p> <p>18 of?</p> <p>19 A. She will be surprised and say some of the</p> <p>20 girls are too young, and I said -- we just wonder,</p> <p>21 you know, but we comment each other.</p> <p>22 Q. Did it ever -- as a father did it ever</p> <p>23 occur to you that maybe I should say something or</p> <p>24 I shouldn't be here or I shouldn't be apart of</p> <p>25 this considering how young they are and how old he</p>	<p style="text-align: right;">Page 232</p> <p>1 a lack of respect. So, you know, she was</p> <p>2 shocked. So obviously she needed a job but</p> <p>3 she expressed her --</p> <p>4 MR. WILLITS: I'm sorry, I did not hear</p> <p>5 that, could the witness repeat that?</p> <p>6 THE WITNESS: I was just talking about</p> <p>7 Louella, deeply religious staff member that</p> <p>8 worked with me and she told me one occasion</p> <p>9 that she was crying because the picture of</p> <p>10 the Pope was next to a naked girl.</p> <p>11 MR. WILLITS: Okay.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. Okay. Besides Louella did you ever have</p> <p>14 a conversation with anybody else that works in the</p> <p>15 house about the young age of the girls and Mr.</p> <p>16 Epstein being in the bedroom and the fact that</p> <p>17 there are sex toys on the floor afterwards being</p> <p>18 wrong?</p> <p>19 MR. CRITTON: Form.</p> <p>20 THE WITNESS: Nobody else inside the</p> <p>21 house was allowed except just the two of us,</p> <p>22 so I never commented on this with anybody.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. All right. The next sentence starts a</p> <p>25 new paragraph, Epstein ordered Rodriguez to go to</p>
<p style="text-align: right;">Page 231</p> <p>1 is?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. Is that something that on more than one</p> <p>6 occasion you thought to yourself this is just</p> <p>7 wrong?</p> <p>8 MR. CRITTON: Form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q. And did you ever have a conversation with</p> <p>12 Louella about the fact that that's not right?</p> <p>13 A. We had.</p> <p>14 Q. And Louella stayed there and she's still</p> <p>15 employed there?</p> <p>16 A. I believe she was.</p> <p>17 Q. And did she ever mention to you that she</p> <p>18 thought that the situation was wrong and that she</p> <p>19 was contemplating --</p> <p>20 A. She was a deeply religious --</p> <p>21 MR. CRITTON: Form to the last question.</p> <p>22 THE WITNESS: -- Catholic Filipino girl</p> <p>23 -- lady, and one day she came crying because</p> <p>24 she found a picture of the Pope next to</p> <p>25 naked girl, both pictures, and she said it's</p>	<p style="text-align: right;">Page 233</p> <p>1 the Dollar Rent a Car and rent a car for the same</p> <p>2 girl he brought the roses to.</p> <p>3 I guess we're talking about A.</p> <p>4 So that she could drive herself to</p> <p>5 Epstein's house without incident. Rodriguez said</p> <p>6 the girl always needed rides to and from the</p> <p>7 house.</p> <p>8 Are those statements you agree with?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: I took her a few times to</p> <p>11 her house.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. You took A. to and from her house?</p> <p>14 A. In Royal Palm Beach.</p> <p>15 Q. Okay. Did she say anything in the car to</p> <p>16 you about what was going on in the bedroom with</p> <p>17 Mr. Epstein?</p> <p>18 A. I always try to keep the conversation to</p> <p>19 a minimum when I was with them because it was my</p> <p>20 job, you know, I didn't want to talk so the</p> <p>21 conversation was minimal.</p> <p>22 Q. And these are girls that you're talking</p> <p>23 to that are roughly the same age as a daughter</p> <p>24 that you have?</p> <p>25 A. Yeah.</p>

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1 MR. CRITTON: Form.  
 2 BY MR. EDWARDS:  
 3 Q. And so you never inquired of them as to  
 4 what was going on behind closed doors?  
 5 A. Never.  
 6 Q. Other than A. did you take any of the  
 7 other girls to or from -- and the girls I'm  
 8 talking about are these young girls that are  
 9 roughly the same age as C. and T. that you  
 10 labelled masseuses.  
 11 Did you take any of them to or from their  
 12 homes on any occasion?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: Probably a couple of times.  
 15 BY MR. EDWARDS:  
 16 Q. Do you remember if you ever took C. or T.  
 17 to or from their homes?  
 18 A. I don't remember but if it was somewhere  
 19 in West Palm Beach or Royal Palm Beach, probably,  
 20 yes.  
 21 Q. All right. And the homes you would take  
 22 these girls to, can you describe the neighborhood?  
 23 A. They were blue collar neighborhoods.  
 24 Q. Much different than Mr. Epstein?  
 25 MR. CRITTON: Form.

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1 THE WITNESS: Very different.  
 2 MR. CRITTON: Argumentative.  
 3 BY MR. EDWARDS:  
 4 Q. Did any of the girls ever talk to you in  
 5 the car about anybody else that they ever gave a  
 6 massage to?  
 7 A. No, they were very private.  
 8 Q. Rodriguez referred to himself as a human  
 9 ATM machine and was ordered by Epstein to maintain  
 10 a minimum balance of \$2,000 on him at all times.  
 11 That's something you've told us already.  
 12 Right?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: Yeah.  
 15 BY MR. EDWARDS:  
 16 Q. When a girl would come by the house and  
 17 Mr. Epstein was either not in the residence or was  
 18 not at home at the time Rodriguez was to provide  
 19 the girl, in parenthesis, masseuse, several  
 20 hundred dollars for their time and to notify  
 21 Epstein the amount they were given.  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: Well, I have to give this  
 24 report to the comptroller in New York to  
 25 keep track of the cash. I never talk to Mr.

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1 Epstein.  
 2 BY MR. EDWARDS:  
 3 Q. Okay. But this is talking about a  
 4 situation where girls come to the house, and these  
 5 young girls come to the house and Mr. Epstein is  
 6 not at the house at all. That happened?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: Well, they left and --  
 9 BY MR. EDWARDS:  
 10 Q. Wait. Who are you talking about?  
 11 A. Mr. Epstein, the girls, and Sarah, they  
 12 go away.  
 13 Q. You're talking about a different set of  
 14 girls now, now you're talking about the girls that  
 15 fly with him on the airplane.  
 16 A. Exactly. But they're out of the house.  
 17 But Sarah will call me and leave me instructions  
 18 on my phone that I have to pay so and so and they  
 19 will be there this evening or this afternoon,  
 20 that's why there was nobody in the house but I  
 21 still have to pay them.  
 22 Q. Okay. Would these girls usually arrive  
 23 by taxicab and you would have to pay them?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: Sometimes taxi and

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1 sometimes their own cars.  
 2 BY MR. EDWARDS:  
 3 Q. And you mentioned that you would  
 4 sometimes be the person to call them a cab.  
 5 Right?  
 6 A. Yes.  
 7 Q. How did you know which cab service to  
 8 use?  
 9 A. We used to have in the house two or three  
 10 numbers and people knew the house because  
 11 sometimes it was hard to -- it was easy to get  
 12 lost to get to the house.  
 13 Q. So were there certain taxicab drivers  
 14 that you would ask to come specifically?  
 15 A. Yes.  
 16 Q. Who?  
 17 A. I don't remember, but they knew the house  
 18 right away, it's like Joe, come here, I need you.  
 19 Q. Would you have that name of that person  
 20 that would typically drive these girls, you know,  
 21 in taxicabs to and from the house anywhere?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: I don't think so.  
 24 BY MR. EDWARDS:  
 25 Q. Do you remember whether it was Yellow Cab

60 (Pages 234 to 237)

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1 Cab Company?  
 2 A. West Palm Beach Taxi. No, it's not  
 3 Yellow. Could be Yellow, but I don't know.  
 4 Q. Would Mr. Epstein have the names or the  
 5 list?  
 6 A. Probably.  
 7 MR. CRITTON: Form.  
 8 BY MR. EDWARDS:  
 9 Q. Anybody else?  
 10 A. Sarah.  
 11 Q. Sarah would have?  
 12 A. Yes.  
 13 Q. In addition to Mr. Epstein obviously  
 14 knowing who's coming to and from the house, would  
 15 Sarah also be familiar with the names of the girls  
 16 and who they were?  
 17 A. Yes.  
 18 Q. In addition to Sarah and Mr. Epstein  
 19 would Ghislaine Maxwell be familiar with the names  
 20 of some of these girls?  
 21 MR. CRITTON: Form.  
 22 THE WITNESS: Yes.  
 23 BY MR. EDWARDS:  
 24 Q. Are these names kept in a database in a  
 25 computer system?

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1 A. Could be.  
 2 MR. CRITTON: I'm sorry, did you say  
 3 could be?  
 4 THE WITNESS: Yeah.  
 5 MR. CRITTON: Move to strike as  
 6 speculation.  
 7 BY MR. EDWARDS:  
 8 Q. When you say could be, why do you say  
 9 that?  
 10 A. Because there were too many and they were  
 11 very organized and there is nothing you write on a  
 12 piece of paper.  
 13 Q. When you say they were very organized,  
 14 are we talking --  
 15 A. Mr. Epstein and Sarah.  
 16 Q. Anybody else beside Mr. Epstein and  
 17 Sarah, I guess beside Sarah that would do the  
 18 scheduling to coordinate the times these girls  
 19 would come to the house?  
 20 A. I'm sorry, anybody else you say?  
 21 Q. Right, aside from Sarah.  
 22 A. No, no.  
 23 Q. And do you know what role, if any, Nadia  
 24 Marcenacova ever played in any of what would go on  
 25 behind the bedroom door with Mr. Epstein?

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1 A. Nadia was the number one girlfriend for  
 2 Mr. Epstein. Very sweet girl, and she was always  
 3 -- she would come over to the house but different  
 4 girls with her all the time.  
 5 Q. Okay. But Nadia, that's somebody who  
 6 lives in New York?  
 7 A. Nadia, I believe, yes, her address is in  
 8 New York.  
 9 Q. So how often would she stay at 358 El  
 10 Brillo?  
 11 A. Very often.  
 12 Q. Usually every time when Mr. Epstein was  
 13 there?  
 14 A. Yes.  
 15 Q. And she would for the most time fly on  
 16 the plane with Mr. Epstein?  
 17 A. Yes.  
 18 Q. And it would be her and Mr. Epstein and  
 19 oftentimes some other girls?  
 20 A. Exactly.  
 21 Q. Where some points I think earlier when  
 22 Mr. Mermelstein was asking you questions where  
 23 there was some confusion was we're talking about  
 24 two different sets of girls, the girls that would  
 25 come over and be labelled masseuses from the Palm

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1 Beach area, and the girls that would fly on the  
 2 plane with Mr. Epstein and Ms. Marcenacova.  
 3 So, what I'm asking you is what, if any,  
 4 involvement did Nadia Marcenacova have with the  
 5 girls that would arrive and be labeled as  
 6 masseuses behind closed doors with Mr. Epstein?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: He was the second -- the  
 9 first role was Sarah and she was always --  
 10 Nadia is a very shy person so she will be in  
 11 the background.  
 12 BY MR. EDWARDS:  
 13 Q. Did you ever know of Nadia Marcenacova to  
 14 engage in -- to be in the room with Mr. Epstein  
 15 while any of these young girls were up there?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: Yeah.  
 18 BY MR. EPSTEIN:  
 19 Q. How often do you remember Nadia and Mr.  
 20 Epstein being in the room with any of these young  
 21 girls?  
 22 A. I would say most of the time.  
 23 Q. Nadia would go up there too?  
 24 A. Yeah.  
 25 Q. Did you ever believe that Nadia was

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<p style="text-align: right;">Page 242</p> <p>1 engaging in sex acts with these young girls?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: No, I don't know.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. No one ever told you that?</p> <p>6 A. No.</p> <p>7 Q. Well, since you've been keeping up with</p> <p>8 what's been written in the newspapers, at some</p> <p>9 point in time you've read that Nadia Marcenacova</p> <p>10 joined in some of these sex acts with some of</p> <p>11 these girls. Right?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: I believe so.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. I'm not the first person telling you</p> <p>16 that?</p> <p>17 A. No, no, no, I read it in the newspaper.</p> <p>18 MR. CRITTON: He read your press release.</p> <p>19 MR. EDWARDS: Long before I ever had</p> <p>20 anything to do with this case.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. Were you surprised when you read that?</p> <p>23 MR. CRITTON: Form.</p> <p>24 THE WITNESS: No.</p> <p>25 BY MR. EDWARDS:</p>	<p style="text-align: right;">Page 244</p> <p>1 page 72, Rodriguez stated the amount of girls that</p> <p>2 came to the house was approximately 15.</p> <p>3 That's the estimate that you gave back --</p> <p>4 A. All the girls that I saw coming in and</p> <p>5 out.</p> <p>6 Q. Well, when I read this, you can tell me</p> <p>7 what it actually means, when I read this I</p> <p>8 interpreted that as because they were talking</p> <p>9 about masseuses I interpreted that as the number</p> <p>10 of girls of the Palm Beach area that came over and</p> <p>11 you labeled masseuses. Is that correct?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. Okay. Could you name -- I mean, I know</p> <p>16 that we've named T. and C., could you name any of</p> <p>17 the other --</p> <p>18 A. C. comes all the time, you know, I</p> <p>19 remember her.</p> <p>20 Q. Okay. No other names pop out though?</p> <p>21 A. To be honest with you, no.</p> <p>22 Q. A.?</p> <p>23 A. Yeah, because I remember because the car.</p> <p>24 Q. All right. It goes on to say, when asked</p> <p>25 to identify these girls, so somebody else asked</p>
<p style="text-align: right;">Page 243</p> <p>1 Q. Were you surprised when the story started</p> <p>2 coming out that these girls that were coming over</p> <p>3 to the house were under the age of 18 and Mr.</p> <p>4 Epstein was engaging in sex acts with them?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. When was the first time that you knew for</p> <p>9 sure 100 percent that -- well, let me say it this</p> <p>10 way.</p> <p>11 When was the first time that you read</p> <p>12 that information?</p> <p>13 A. Underage?</p> <p>14 Q. Yes.</p> <p>15 A. When this scandal broke out when the Palm</p> <p>16 Beach Police Department --</p> <p>17 Q. Contacted you?</p> <p>18 A. Yeah.</p> <p>19 MR. CRITTON: Why don't you let him</p> <p>20 finish his answer instead of suggesting or</p> <p>21 giving him the answer.</p> <p>22 THE WITNESS: The West Palm Beach Police</p> <p>23 Department got involved.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Skipping to the second paragraph of</p>	<p style="text-align: right;">Page 245</p> <p>1 you the same question I just did, Rodriguez stated</p> <p>2 he could not at the moment but knew he wrote their</p> <p>3 names down on a journal he kept during his employ</p> <p>4 with Mr. Epstein. Is that true?</p> <p>5 A. Yes.</p> <p>6 MR. CRITTON: Form.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. Did you ever find that journal?</p> <p>9 A. Probably has some pages at home.</p> <p>10 Q. Because later on it seems like you met up</p> <p>11 with the police officer and produced a green</p> <p>12 folder that contained documents, but that's not</p> <p>13 the same thing as the journal. Right?</p> <p>14 A. No, this is my writings.</p> <p>15 Q. Okay. So if we want to obtain that</p> <p>16 journal from you what's the best way to go about</p> <p>17 getting it?</p> <p>18 A. I probably have to look in my house.</p> <p>19 Q. Okay. Well, it looks like we're going to</p> <p>20 come back for a second part of this, so by next</p> <p>21 time maybe you could find it. Right?</p> <p>22 A. Okay.</p> <p>23 Q. All right. Mr. Mermelstein asked you if</p> <p>24 anybody had contacted you about this case that was</p> <p>25 either an -- that was an investigator with Mr.</p>

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1 Epstein. Right?

2 A. Yes.

3 Q. And the first thing that I wrote was that

4 two investigators met you for a couple of hours at

5 Don Shula's. Is that right?

6 A. Yes.

7 Q. How did that whole meeting come together,

8 did they call you?

9 A. Well, they came to my house and then we

10 agreed for a more detailed meeting, and halfway

11 through -- I was in the area something he said I

12 can meet you there, so he suggest Don Shula Hotel.

13 Q. How long did you talk with them at your

14 house?

15 A. Probably an hour or two.

16 Q. So there was an hour or two at your

17 house?

18 A. Yes.

19 Q. And then they decided you weren't

20 finished talking with them yet and they talked

21 with you two more hours at Don Shula's?

22 A. Yes.

23 Q. So you spent up to four hours with these

24 investigators for Mr. Epstein?

25 MR. CRITTON: Form.

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1 THE WITNESS: Yes.

2 BY MR. EDWARDS:

3 Q. And I know that you told us a couple of

4 things, they wanted to know what you knew, but did

5 they suggest a way for you to testify to help Mr.

6 Epstein?

7 MR. CRITTON: Form, asked and answered.

8 THE WITNESS: The way the meeting went is

9 he took notes and asked me questions how do

10 you know, he asked me about -- it's like I'm

11 going to a job, what do you know about this,

12 running this, who is this person, so it was

13 like questions and answers, questions and

14 answers.

15 BY MR. EDWARDS:

16 Q. Okay.

17 A. And that was it, you know, but mostly the

18 questions from their side.

19 Q. Okay. And then the next contact that you

20 had was with Jack Goldberger?

21 A. Yeah.

22 Q. And you called Jack Goldberger --

23 A. Yeah, because the subpoena.

24 Q. Okay. Well, the first time you call Jack

25 Goldberger had something to do with the FBI.

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1 Right?

2 A. Yeah, exactly, we talked before, yes.

3 Q. So this is before the subpoena --

4 A. Yes, yes.

5 Q. And you called him and said the FBI is

6 wanting to talk to me, what should I do?

7 A. Yeah. He told me, you know, tell them

8 the truth. And so actually he didn't call me back

9 but he know the FBI sat down with me in the

10 morning in Green's Pharmacy in Palm Beach.

11 Q. Where?

12 A. In Green's Pharmacy, it's in front of the

13 church.

14 Q. How long did you talk to the FBI?

15 A. From 8 to 12, more or less.

16 Q. So another four hour talk?

17 A. More or less, yes. It was the same thing

18 as the Palm Beach Police Department but they told

19 me this is a new investigation because the same

20 questions that Palm Beach Police Department ask me

21 they start with the same thing, what was going on,

22 this and that, and so -- but in a different -- in

23 a different character they ask me the same

24 questions but they went on and on and on.

25 Q. Okay. When did you have your sit down

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1 meeting with Mr. Critton?

2 A. In his office.

3 Q. When?

4 A. Oh when? Last week.

5 Q. Last week?

6 A. Or I believe two weeks ago, something

7 like that, before this.

8 Q. So you received the subpoena for your

9 deposition that was scheduled for last week --

10 A. Exactly.

11 Q. -- but you had car problems. And you

12 called Jack Goldberger again?

13 A. Yeah. And he told me he was out of town,

14 and then one guy came to my house -- actually, one

15 of the securities from Epstein.

16 Q. A security guard for Epstein?

17 A. No, security expert.

18 Q. So an investigator?

19 A. An investigator, sorry. And he said get

20 in touch with Mr. Critton.

21 Q. Do you remember who that is?

22 A. I have his card at home.

23 Q. Do you remember what the card looks like?

24 A. It's a yellow card, security or

25 investigation or something.

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1 Q. Would you know the name if I said it?  
 2 A. Yeah.  
 3 Q. Bill Riley?  
 4 A. Yes.  
 5 Q. Okay. Have you ever spoken with an  
 6 investigator Paul Lavery?  
 7 A. Could be, I'm not sure.  
 8 Q. Okay. So Bill Riley came by your house  
 9 personally?  
 10 A. Yes.  
 11 Q. And how long did you meet with him?  
 12 A. Five minutes. He gave me his card, he  
 13 gave me Mr. Critton telephone number, he said  
 14 don't talk to Mr. Goldberger.  
 15 Q. Did he tell you why you should call Mr.  
 16 Critton?  
 17 A. No. I assume that he was not on the case  
 18 anymore, but I didn't ask questions but --  
 19 Q. You assumed that who wasn't on the case  
 20 anymore?  
 21 A. Mr. Goldberger, Jack Goldberger.  
 22 Q. Okay. But what I'm asking you, I guess,  
 23 is did this investigator, Mr. Riley, tell you why  
 24 it was important for you to call any attorney  
 25 that's associated with Mr. Epstein, why was that

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1 important?  
 2 A. He didn't say that. He didn't say that.  
 3 He just said that get in touch and that's it.  
 4 Because I said what am I going to do, because I  
 5 said I thought this was -- you know, but I didn't  
 6 know I was going to be subpoena. And like I said  
 7 in the beginning of this deposition, I don't have  
 8 an attorney so I don't have money, first of all,  
 9 to pay for an attorney. First of all, I don't  
 10 think I'm in trouble, but every time you hear high  
 11 powered lawyers you feel intimidated so I said,  
 12 listen, what am I going to do, and that was my  
 13 basic question.  
 14 Q. Okay. So then you spoke with somebody at  
 15 Mr. Critton's office and arranged to meet with him  
 16 personally?  
 17 A. Yes. I called his secretary and we sit  
 18 down with his assistant, the three of us.  
 19 Q. So it was Mr. Critton, yourself, and  
 20 somebody else?  
 21 A. Yes.  
 22 Q. And you sat down for another two hour  
 23 period of time?  
 24 A. Yes.  
 25 Q. And what did you go over in that meeting?

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1 A. We discuss -- he asked me a lot of  
 2 questions, obviously he didn't know a lot of  
 3 things about the case, and I told him who I was,  
 4 what I did in the house.  
 5 Q. He told you he didn't know a lot about  
 6 the case?  
 7 A. No, no, no. He asked me questions about  
 8 so I got the feeling that Mr. Critton didn't know  
 9 as much as other lawyers.  
 10 Q. Okay. Did you tell him what you told us  
 11 here today?  
 12 A. No. He asked me tell the truth, you  
 13 know, just go over there, you know, he advise me  
 14 like you're on your own, Alfredo, just tell the  
 15 truth, you know. He didn't give me any advice.  
 16 He paid for my gas. Thank you very much.  
 17 And that's it, you know.  
 18 The main thing I wanted to have a lawyer  
 19 on my side but then I keep going to the first  
 20 instance when my wife told me you don't need a  
 21 lawyer, and I'm here today to say that, I'm here,  
 22 I'm speaking the truth.  
 23 Q. Okay. You mentioned there were five or  
 24 six computers in the house?  
 25 A. Yes.

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1 Q. And do you know what happened to the  
 2 computers?  
 3 A. No.  
 4 Q. You don't know where they are?  
 5 A. (Shakes head.)  
 6 Q. Nobody has told you?  
 7 A. No.  
 8 Q. You also mentioned there were photographs  
 9 in the house?  
 10 A. In the computers in the files.  
 11 Q. Okay. But there were also still  
 12 photographs around the house?  
 13 A. Oh yes, yes.  
 14 Q. Some of the girls have made the  
 15 allegation that there were photographs of them  
 16 nude in the house. Do you remember seeing that?  
 17 A. In the closet, yeah, in a mosaic. It was  
 18 one frame with probably 15 pictures, small  
 19 pictures.  
 20 MR. CRITTON: Repeat the question back.  
 21 BY MR. EDWARDS:  
 22 Q. Okay. Some of the girls that have  
 23 lawsuits against Mr. Epstein with allegations  
 24 similar to the allegations that C. and T. have  
 25 made, which is that they were underage when Mr.

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1 Epstein was engaging in sex or sex acts with them,  
2 also say that they have seen pictures of  
3 themselves in frames in Mr. Epstein's house naked.

4 A. In his closet.

5 Q. Other than the picture -- and these are  
6 girls who are making the allegation that they were  
7 underage and there were pictures of them nude in  
8 his house.

9 A. I didn't see pictures of C. there.

10 Q. I'm not talking about C. I'm saying  
11 other girls that were underage or have made  
12 allegations that they have seen pictures of  
13 themselves in Mr. Epstein's house.

14 MR. CRITTON: Form.

15 BY MR. EDWARDS:

16 Q. Where would those photos have been, or  
17 did you see them?

18 A. Yes, I see them inside his closet.

19 Q. It's one mosaic?

20 A. Yes, one mosaic.

21 Q. Other than there did you see any of these  
22 pictures of young girls nude anywhere else in the  
23 house?

24 MR. CRITTON: Form.

25 THE WITNESS: Nude with an art, yes, but

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1 not pornography. You know, I saw them, they  
2 were all over the place. For instance, in  
3 the back only showing part of the rear, you  
4 know.

5 BY MR. EDWARDS:

6 Q. But the photographs that I'm concerned  
7 with --

8 A. Not frontal pictures.

9 Q. The photographs I'm concerned with are  
10 photographs of these West Palm Beach girls that  
11 were labeled as masseuses that are being displayed  
12 around the house anywhere in some state of  
13 undress.

14 MR. CRITTON: Form.

15 THE WITNESS: No, I don't remember that.

16 BY MR. EDWARDS:

17 Q. Okay. The only girls that -- the only  
18 photograph that you remember of young girls nude  
19 was in a mosaic that is in his closet?

20 A. Yes.

21 Q. Nothing that you remember that was on  
22 display?

23 A. Downstairs, yes, but they were not these  
24 girls, they were somebody else.

25 Q. Okay. Do you know who was -- who were in

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1 those photos?

2 A. One was a Columbian lady and one was --  
3 one from Spain, beautiful girls, that, you know,  
4 but they were not -- not the ones the girls we're  
5 talking about here.

6 Q. Okay. When you were hired were you hired  
7 by Mr. Epstein or were you hired by one of his  
8 companies?

9 A. Mrs. Maxwell.

10 Q. So it was -- was it a company owned by  
11 Mrs. Maxwell?

12 A. Not directly. My paycheck was Jeffrey  
13 Epstein. I mean, I was hired by Mr. Epstein  
14 but --

15 Q. Okay. I just understood you to say you  
16 were hired by Mrs. Maxwell.

17 A. Exactly, she told me you're hired but  
18 you're going to get paid by Mr. Epstein.

19 Q. And he wrote you personal checks?

20 A. No. The checks that came from New York,  
21 Jeffrey Epstein Companies.

22 Q. It was out of his company?

23 A. Yes.

24 Q. Which company; do you know?

25 A. 456 Madison Avenue. It's next to the New

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1 York Palace now.

2 Q. The name of the company is 456 Madison  
3 Avenue?

4 A. No, no, it's -- I got it on the tip of my  
5 tongue. Something like Caribbean or island  
6 something investments, something like that.

7 If you call Lesley, her secretary, she  
8 will tell you exactly. Because they answer the  
9 phone like that, you know.

10 Q. What's Lesley's number?

11 A. Lesley, I don't have it. I can find out  
12 for you.

13 Q. Do you think you could get Lesley's  
14 number for us?

15 A. Yes. It's in Manhattan.

16 Q. Does she work for this company in  
17 Manhattan?

18 MR. CRITTON: Form.

19 THE WITNESS: Manhattan, yes.

20 BY MR. EDWARDS:

21 Q. If the check was issued did Jeffrey  
22 Epstein actually sign it himself?

23 A. No, it came through the comptroller.

24 Q. Who was the comptroller?

25 A. Bella was the assistant comptroller and

65 (Pages 254 to 257)

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1 there was somebody else. It was so long ago.  
 2 Q. And the money that you would hold on you  
 3 in cash, that's money that came out --  
 4 A. Colonial Bank in 4th Avenue.  
 5 Q. And is that Colonial Bank account, is  
 6 that registered to Jeffrey Epstein personally  
 7 or to his company?  
 8 A. No, Ghislaine Maxwell.  
 9 Q. To Ghislaine Maxwell.  
 10 MR. CRITTON: Did you say it's her  
 11 account?  
 12 THE WITNESS: Well, I was the secondary,  
 13 you know, because her name was there, but I  
 14 know it was Jeffrey Epstein's money.  
 15 BY MR. EDWARDS:  
 16 Q. Okay. What I'm holding is what's already  
 17 been attached to this as Exhibit 2. I'll show you  
 18 again, can you tell me what bank that is?  
 19 A. Yeah, this is Colonial Bank in Palm  
 20 Beach.  
 21 Q. And is --  
 22 A. His name is here.  
 23 Q. Right. The three names on the account  
 24 are Jeffrey Epstein, Ghislaine Maxwell, and  
 25 Alfredo Rodriguez.

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1 A. Yes.  
 2 Q. Is this a company account or a personal  
 3 account?  
 4 A. I think it's a personal account.  
 5 Q. And do you know what account funds this  
 6 account?  
 7 A. The one in New York.  
 8 Q. The same account that you are paid from  
 9 in New York --  
 10 A. No, no, it's not the same.  
 11 Q. Different account in New York?  
 12 A. Yes.  
 13 Q. All right. Which account in New York  
 14 funds the account that is Exhibit 2?  
 15 A. The one Bella knows, she's the assistant  
 16 comptroller.  
 17 Q. And do you know Bella's number?  
 18 A. I can find out for you.  
 19 Q. Do you know the name of that company?  
 20 A. I have in my house.  
 21 Q. You have the name of that company?  
 22 A. Yes.  
 23 Q. All right. So you have the name of the  
 24 company or either you can get me Lesley's number  
 25 who has the name of the company that paid you, and

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1 you also have the name of the company at the house  
 2 which is associated with this person Bella as well  
 3 that financed the account that you withdrew money  
 4 from to pay the girls?  
 5 A. Yeah.  
 6 Q. Okay. Do you know what account Sarah  
 7 Kellen was paid out of?  
 8 A. No.  
 9 MR. EDWARDS: Somebody else want to go.  
 10 I mean, we're obviously not going to finish  
 11 so I don't want to take up the rest.  
 12 MR. LANGINO: I only have about ten  
 13 minutes of question.  
 14 EXAMINATION  
 15 BY MR. LANGINO:  
 16 Q. My name is Adam Langino from the Law Firm  
 17 of Leopold Kuvin and we represent B.B. in this  
 18 case.  
 19 So you've obviously been here for about  
 20 six hours so I don't have to reinvent the wheel,  
 21 so I'm going to ask you a couple of questions that  
 22 came to mind.  
 23 Any of the individuals that provided  
 24 massage to Mr. Epstein, were they provided any  
 25 drugs?

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1 A. No, I don't think so.  
 2 Q. Were they provided any alcohol?  
 3 A. No, there was no alcohol in the house.  
 4 Q. When they arrived did any of them appear  
 5 to be under the influence of drugs?  
 6 A. There was one girl who came and looked  
 7 like she was shooting heroin.  
 8 Q. Can you describe what that girl looked  
 9 like?  
 10 A. Very skinny with under mark on her eyes I  
 11 saw a couple of times.  
 12 Q. Do you remember which month that girl  
 13 came to the house?  
 14 A. That was December or January of 2005.  
 15 Q. Do you know why she was at the house?  
 16 A. She asked me when I met her, she said I'm  
 17 looking for a job, I want to help doing the  
 18 laundry, so I related this message to Sarah and  
 19 Sarah told me I'll take care of her from here, but  
 20 I don't know.  
 21 Q. Do you know if she gave a massage to Mr.  
 22 Epstein?  
 23 A. No, I don't know.  
 24 Q. Do you remember any individual who came  
 25 to the house to give Mr. Epstein a massage was

66 (Pages 258 to 261)

Page 262

1 under the influence of alcohol?  
 2 A. No, I don't know.  
 3 Q. When Mr. Epstein's investigators first  
 4 contacted you, did you want to speak with them?  
 5 A. If I wanted to talk to the investigators?  
 6 Q. Did you want to speak with them?  
 7 A. Yes, because I was concerned if I was in  
 8 trouble with Mr. Epstein or I was in trouble with  
 9 anything.  
 10 Q. In December 2005, early January 2006 when  
 11 you cooperated with the police, how come you  
 12 cooperated with the police?  
 13 A. They give me an introduction of what was  
 14 going on, and the investigation, at that time  
 15 nobody knew, the press, nobody, and they told me  
 16 they needed my cooperation and I -- they asked me  
 17 we like to know your honest answers, and that's  
 18 what I did.  
 19 Q. How did you feel about cooperating?  
 20 A. I feel good.  
 21 Q. You stated --  
 22 A. Sorry, go ahead.  
 23 Q. Did you have anything else to add?  
 24 A. No, I hope, I thought I did the right  
 25 thing.

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1 Q. You stated that you picked up I guess  
 2 some of the oils and creams that were left over  
 3 after the massage.  
 4 A. Yes.  
 5 Q. Do you remember the names of any of those  
 6 products?  
 7 A. Names of those products. Spa is one of  
 8 them, like the place spa.  
 9 Q. Any other names?  
 10 A. And it's a big tube like this, no, I  
 11 don't remember right now.  
 12 Q. Do you know if any of those massages or  
 13 oils had any kind of a sexual connotation to the  
 14 name or the product?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: No.  
 17 BY MR. LANGINO:  
 18 Q. Do you know if any masseuse that came to  
 19 Epstein's home ever provided massage to someone  
 20 else besides Mr. Epstein?  
 21 A. No, I don't know.  
 22 Q. Before you talked about a massager that  
 23 was always present after a massage and you stated  
 24 that you placed that massager back into inventory.  
 25 A. Yes.

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1 Q. Where was that inventory?  
 2 A. It was kept in an armoire in the master  
 3 bedroom -- master bath.  
 4 Q. Was that massager that was always found  
 5 after these massages kept in the same armoire with  
 6 the sex toys?  
 7 A. No, it's a different armoire, different  
 8 furniture.  
 9 Q. Were any other massagers kept in that  
 10 armoire?  
 11 A. Yes.  
 12 Q. Can you describe them?  
 13 A. Two, two big ones, the two rubber tips,  
 14 they were kept in the bathroom.  
 15 Q. And where was this armoire in relation to  
 16 the one that held the sex toys?  
 17 A. The one with the sex toys was in his  
 18 bedroom in front of his table, in front of his  
 19 bed, and the other ones were inside the bathroom.  
 20 Q. Did you ever cleanup female clothes after  
 21 a massage?  
 22 A. No.  
 23 Q. Did you ever cleanup any towels after a  
 24 massage?  
 25 A. No.

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1 Q. Did you ever inspect any blood on any  
 2 type of item in the massage room after a massage?  
 3 A. No.  
 4 Q. I know we spoke about pictures, do you  
 5 know if Mr. Epstein kept any videotapes of any of  
 6 these massages?  
 7 A. No.  
 8 Q. Do you know if he has any videotape of  
 9 any of these masseuses?  
 10 A. No, I don't know.  
 11 Q. Do you hold any significant feeling  
 12 regarding Mr. Epstein finishing his jail sentence  
 13 now that he's free?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: If he was sentenced for  
 16 solicitation of prostitution and he did  
 17 leave before that, you know, I think it's  
 18 not -- I don't think he has been doing what  
 19 he was supposed to do, you know, the full  
 20 18 months, and to be monitored after that  
 21 and what have you. But I don't think --  
 22 answering your question, I don't think it's  
 23 been done justice.  
 24 MR. CRITTON: Let me move to strike as  
 25 irrelevant to anything.

67 (Pages 262 to 265)

Page 266

1 BY MR. LANGINO:  
 2 Q. Are you currently in fear of Mr. Epstein?  
 3 A. Not at this particular moment but it's  
 4 something I have to be worry about, yes.  
 5 Q. Are you personally afraid of criminal  
 6 prosecution?  
 7 A. No.  
 8 Q. Do you believe that you did anything  
 9 illegal?  
 10 A. Illegal, no.  
 11 MR. LANGINO: I have no further  
 12 questions. Thank you.  
 13 MR. CRITTON: We're going to break in  
 14 about 15 minutes. Do you want to start and  
 15 go for 15 minutes or do you want to -- it's  
 16 up to you.  
 17 MS. EZELL: I'll start.  
 18 MR. WILLITS: When are we going to quit,  
 19 folks?  
 20 MR. CRITTON: In 15 minutes.  
 21 THE VIDEOGRAPHER: Might as well change  
 22 tapes.  
 23 MR. EDWARDS: Bob has to get back so  
 24 we've agreed we're going to come back some  
 25 other time.

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1 MR. WILLITS: Why don't we just stop now?  
 2 MS. EZELL: Okay.  
 3 MR. EDWARDS: Rather than you start.  
 4 MS. EZELL: Yeah, I won't get very far.  
 5 MR. EDWARDS: Sorry to do this with you,  
 6 we didn't finish.  
 7 MR. CRITTON: So we're stopped?  
 8 MR. EDWARDS: We're stopped.  
 9 THE VIDEOGRAPHER: Off the record.  
 10 (Thereupon, the videotaped deposition was  
 11 adjourned at 5:30 p.m.)  
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1 THE STATE OF FLORIDA, )  
 2 COUNTY OF DADE. )  
 3  
 4  
 5 I, the undersigned authority, certify  
 6 that ALFREDO RODRIGUEZ personally appeared before  
 7 me on the 29th day of July, 2009 and was duly  
 8 sworn.  
 9  
 10 WITNESS my hand and official seal this  
 11 31st day of July, 2009.  
 12  
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MICHELLE PAYNE, Court Reporter  
 Notary Public - State of Florida

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1 CERTIFICATE  
 2  
 3 The State Of Florida, )  
 4 County Of Dade. )  
 5  
 6 I, MICHELLE PAYNE, Court Reporter and  
 7 Notary Public in and for the State of Florida at  
 8 large, do hereby certify that I was authorized to  
 9 and did stenographically report the videotaped  
 10 deposition of ALFREDO RODRIGUEZ; that a review of  
 11 the transcript was requested; and that the  
 12 foregoing pages, numbered from 1 to 269,  
 13 inclusive, are a true and correct transcription of  
 14 my stenographic notes of said deposition.  
 15 I further certify that said videotaped  
 16 deposition was taken at the time and place  
 17 hereinabove set forth and that the taking of said  
 18 videotaped deposition was commenced and completed  
 19 as hereinabove set out.  
 20 I further certify that I am not an  
 21 attorney or counsel of any of the parties, nor am  
 22 I a relative or employee of any attorney or  
 23 counsel of party connected with the action, nor am  
 24 I financially interested in the action.  
 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 31st day of July, 2009.  
 MICHELLE PAYNE, Court Reporter

68 (Pages 266 to 269)