

***PLAINTIFF JANE DOE'S MOTION FOR LEAVE TO PROVIDE RECENTLY-OBTAINED DEPOSITION TESTIMONY AND AFFIDAVIT DEMONSTRATING FRAUDULENT TRANSFERS BY EPSTEIN IN SUPPORT OF MOTION FOR APPOINTMENT OF A RECEIVER TO TAKE CHARGE OF PROPERTY OF EPSTEIN AND INCORPORATED SUPPORTING MEMORANDUM***

**CASE NO: 08-CV-80119-MARRA/JOHNSON**

# **EXHIBIT A-1**

## **(1 of 4)**

**Certified Copy**

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

L.M.,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

~~~~~

CASE NO.  
502008CA028051  
XXXXMB AD

**DEPOSITION OF**

**LARRY VISOSKI**

October 15, 2009  
10:18 p.m.

515 N. Flagler Drive  
Suite P200  
West Palm Beach, Florida

Reported By: Wendy Beath Anderson

  
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IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 502008CA028051XXXXMB AD

L.M.,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

---

DEPOSITION OF LARRY VISOSKI

Thursday, October 15, 2009  
10:18 - 3:37 p.m.

515 N. Flagler Drive  
Suite P200  
West Palm Beach, Florida 33401

Reported By:

Wendy Beath Anderson, RPR, CRR, FPR  
Notary Public, State of Florida  
Esquire Deposition Services  
West Palm Beach Office Job #127542

Larry Visoski

October 15, 2009

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1 APPEARANCES:

2 On behalf of the Plaintiff:

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6 On behalf of the Defendant:

7 ROBERT D. CRITTON, JR., ESQUIRE  
BURMAN, CRITTON & LUTTIER  
9 303 Banyan Boulevard, Suite 400  
West Palm Beach, Florida 33401

10 On behalf of the Witness:

11 BRUCE REINHART, ESQUIRE  
250 South Australian Avenue  
13 Suite 1400  
West Palm Beach, Florida 33401

14 ALSO PRESENT:

15 CARA L. HOLMES, ESQUIRE

17  
18 ADAM D. HOROWITZ, ESQUIRE  
MERMELSTEIN & HOROWITZ, P.A.  
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20 RICHARD H. WILLITS, ESQUIRE (VIA TELEPHONE)  
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- - -  
I N D E X  
- - -

WITNESS: DIRECT CROSS REDIRECT RECROSS

LARRY VISOSKI

BY MR. EDWARDS: 6

BY MR. CRITTON: 214

BY MR. EDWARDS: 220

BY MR. CRITTON: 221

- - -  
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1 P R O C E E D I N G S

2 - - -

3 Deposition taken before Wendy Beath Anderson,  
4 Certified Realtime Reporter and Notary Public in and for  
5 the State of Florida at Large, in the above cause.

6 - - -

7 MR. EDWARDS: We're going to put something on  
8 the record about -- well, we'll do it this way --

9 MR. REINHART: Do it at the end, after we get  
10 him -- whatever you want. It's your show.

11 MR. EDWARDS: Okay. There were -- I don't  
12 even think Mr. Willits is aware of this. There was  
13 a subpoena duces tecum for this witness, as well as  
14 the previous witness, which was another pilot, Dave  
15 Rogers, and that duces tecum was to bring the  
16 flight logs related from 1998 through 2005. What  
17 was produced at the previous deposition were flight  
18 logs from 2002 through 2005, and now Mr. Reinhart  
19 has agreed to produce the remainder of the flight  
20 logs requested, those going from 1998 through 2002.

21 MR. REINHART: Correct. They're pilot logs,  
22 not flight logs. There are other records we  
23 indicated are corporate records, and with those you  
24 have to deal with Mr. Critton.

25 MR. CRITTON: However, with the proviso, too,



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1 that we're going to work out that these records are  
2 to be used within the confines of this litigation  
3 and not to be spread to the press or anyone else,  
4 because they do contain confidential information as  
5 to who may have been on the plane and other records  
6 of Mr. Rogers, which but for the subpoena would  
7 have been only available to the FAA or some other  
8 law enforcement agencies.

9 MR. EDWARDS: Okay. Is that all you want to  
10 put on?

11 MR. CRITTON: Yes.

12 MR. EDWARDS: I'm not saying I necessarily  
13 agree or disagree with you. That's something that  
14 we'll deal with some other day.

15 MR. CRITTON: Bruce, you'd better produce  
16 these records, but there has to be some sort of  
17 understanding before --

18 MR. REINHART: Correct.

19 MR. EDWARDS: I won't do anything until you  
20 file whatever you -- until we work whatever it is  
21 out in court. I'll say that on the record, that  
22 I'm not doing anything with the records outside of  
23 my office until some judge deals with it.

24 MR. REINHART: And for the record, I'll adopt  
25 what Mr. Critton said on this one limited occasion.



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1 MR. EDWARDS: All right.

2 Thereupon,

3 (LARRY VISOSKI)

4 having been first duly sworn or affirmed, was examined  
5 and testified as follows:

6 THE WITNESS: Yes, I do.

7 DIRECT EXAMINATION

8 BY MR. EDWARDS:

9 Q. Can you tell us your name for the record.

10 A. Lawrence Visoski, Jr.

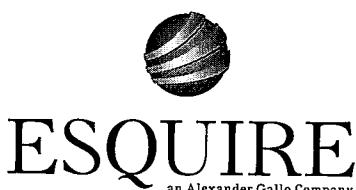
11 Q. And Mr. Visoski, have you ever had your  
12 deposition taken before?

13 A. No.

14 Q. Okay. Here's the process: I'm going to ask  
15 you questions. You're going to give us answers. Try to  
16 give us answers that we all understand and that the  
17 court reporter can take down, such as yes, no, or some  
18 other verbal answer that we can understand. It's easy  
19 when we get in a casual conversation to nod or shake  
20 your head, and the court reporter is not writing  
21 pictures or anything else.

22 A. I understand.

23 Q. The other thing is, and I've been accused of  
24 this in other depositions -- I don't know if it's true  
25 or not -- but I need to wait until you finish answering



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1 the question and you need to wait until I finish asking  
2 the question.

3 A. So you're not allowed to interrupt me?

4 Q. And you're not allowed to interrupt me.

5 A. Like I just did?

6 Q. Right.

7 MR. CRITTON: Cara just snickered when you  
8 said you've been accused because she recognizes  
9 it's true.

10 MR. EDWARDS: I don't know what the meaning of  
11 her snickering was.

12 BY MR. EDWARDS:

13 Q. But for what it's worth, if you don't  
14 understand the question or I've asked a bad question, I  
15 don't want you to guess. Give me the best answer to the  
16 best of your knowledge and if you need me to rephrase  
17 it, I will.

18 A. Okay.

19 Q. Okay. Tell me your current address.

20 A. [REDACTED] Riviera Beach, Florida  
21 33404.

22 Q. How long have you lived there?

23 A. Approximately nine years.

24 Q. Okay. Who do you live there with?

25 A. My wife and one child at this time.

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1 Q. All right. How many children do you have?

2 A. Two.

3 Q. How old are they?

4 A. Fifteen and eighteen.

5 Q. And is the 18-year-old, is not living with  
6 you?

7 A. She's off in school.

8 Q. Okay. What school is that?

9 A. Syracuse.

10 Q. Who's your employer right now?

11 A. NES, LLC.

12 Q. How long has NES, LLC been your employer?

13 A. I'm guessing. I'd say back 1991. I have to  
14 do the math, but 17, 18 years.

15 Q. Has that been your only employer since 1991?

16 A. Yes.

17 Q. And has that been your only source of income  
18 since 1991?

19 A. Yes.

20 Q. And what is NES, LLC?

21 A. I don't really know. I mean, it's the company  
22 that my check comes from.

23 Q. What do you do for NES, LLC that results in  
24 them paying you?

25 A. I am chief pilot for the aircraft and



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1        helicopters.

2        Q.     And do you have a specific boss or somebody  
3        you answer to at NES, LLC?

4        A.     Several people would call to schedule flights  
5        from the office, being it either Mr. Epstein or, you  
6        know, I would just get a phone call and they would  
7        schedule a trip.

8        Q.     Okay. Aside from Mr. Epstein, who else would  
9        there be that would call to schedule flights?

10      A.    Leslie.

11      Q.    Leslie who?

12      A.    Leslie Gruff.

13      Q.    When's the last time you talked to Leslie  
14      Gruff?

15      A.    Probably two weeks ago, three weeks ago.

16      Q.    And where is she currently?

17      A.    I believe in New York, is where I spoke to her  
18      on the phone last.

19      Q.    What's the telephone number you call to reach  
20      Leslie Gruff?

21      A.    (212) 750-9895.

22      Q.    And what address is Leslie Gruff at?

23      A.    Do you mean where the office is located?

24      Q.    Correct.

25      A.    301 East 66th Street.

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1 Q. And it's my understanding from other  
2 depositions that there are also apartments in that 301  
3 East 66th Street building?

4 A. Yes.

5 Q. And Mr. Epstein either owns or leases or rents  
6 certain of those apartments. Is that your  
7 understanding?

8 MR. CRITTON: Form; speculation.

9 THE WITNESS: I'm only speculating. I  
10 don't -- to my understanding, I don't know.

11 BY MR. EDWARDS:

12 Q. Do you know other people that live in that  
13 building?

14 A. Well, it would be myself, Dave Rogers -- well,  
15 when you say "live," explain.

16 Q. When you're saying yourself and Dave Rogers --

17 A. See, we don't live there. I mean, we have --  
18 we would stay there when we would have a trip.

19 Q. Okay. When you would fly up to New York and  
20 land in New York, the place where you would stay, is  
21 that 301 East 66th Street?

22 A. Yes, that's correct.

23 Q. That's also a location you've indicated in  
24 this deposition that is the office for NES, LLC?

25 A. Yes.



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1 Q. What floor or suite number is NES, LLC in?

2 A. I believe -- well, I don't know that NES, LLC  
3 has an office there. I know that's where Leslie has the  
4 phone number where I call. So I don't know for a fact  
5 if NES, LLC has an office there.

6 Q. And what suite number, then, would Leslie  
7 Gruff sit in to answer that telephone number at  
8 750-9895?

9 A. I think it's 10F.

10 Q. And when you stay at 301 East 66th Street,  
11 what suite number or what apartment number do you stay  
12 in?

13 A. 12C.

14 Q. And how about Dave Rogers, where does he stay?

15 A. I'm guessing, because it's been some time  
16 since we've been there, 10B, but don't quote me on it.

17 Q. Who are the other people in that building that  
18 you know to stay there on a regular -- fairly regular  
19 basis?

20 A. I've seen people in the elevator that, you  
21 know, have been on the airplane. Case in point, maybe  
22 Sarah Kellen, but I don't know for a fact that she lives  
23 there, or anybody else for that matter.

24 Q. Okay. When you say you've seen Sarah Kellen  
25 on the elevator --



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1 A. I only assume she lives there. I don't know  
2 for a fact. I'm trying to be honest and factual for  
3 you. So I couldn't honestly say if I knew she lived  
4 there or not.

5 Q. Where do you think Sarah Kellen lives?

6 A. I would think she lives there.

7 Q. You don't have a better location?

8 A. I don't have another location.

9 Q. Anybody else?

10 A. Not to my knowledge. I mean, I'd only be  
11 guessing that people live in that building that -- you  
12 know, I don't have any facts to prove that they actually  
13 live there. I mean, I don't think you want me to guess.

14 Q. Well, NES, LLC, would you say that the owner  
15 or controller of that company is Jeffrey Epstein?

16 MR. CRITTON: Form.

17 THE WITNESS: I don't know that for a fact.

18 BY MR. EDWARDS:

19 Q. Jeffrey Epstein is somebody you've indicated  
20 that you've worked for for 17 or 18 years, right?

21 A. Yes.

22 Q. And over the 17 or 18 years you've become  
23 personally close with him as well, correct?

24 MR. CRITTON: Form.

25 THE WITNESS: I don't understand how you mean



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1 "close." Define that.

2 BY MR. EDWARDS:

3 Q. Well, more so than just a pilot that takes him  
4 from Point A to Point B?

5 A. That is my job.

6 Q. Right. But you know him on a personal level  
7 and that you've had personal conversations that don't  
8 necessarily deal with flying from Point A to Point B;  
9 isn't that right?

10 MR. CRITTON: Form.

11 THE WITNESS: More specific, meaning we talk  
12 about cars. I mean, does that make you a personal  
13 friends?

14 BY MR. EDWARDS:

15 Q. Have you ever gone to his house to eat?

16 A. No.

17 Q. Have you been to his New York home?

18 A. Yes.

19 Q. How many occasions have you been to his New  
20 York home?

21 MR. CRITTON: Object to form.

22 THE WITNESS: We normally pick up luggage in  
23 the lobby, so it would probably be quite often.

24 Any time we depart out of New York, we stop by the  
25 house and pick up luggage and head to the aircraft.

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1 BY MR. EDWARDS:

2 Q. Other than picking up luggage, have you been  
3 to his home to visit or socialize with him?

4 A. Not to socialize, no.

5 Q. Have you been to his Palm Beach home?

6 A. To?

7 Q. To Mr. Epstein's Palm Beach house?

8 A. Right.

9 Q. Have you been there?

10 A. Yes.

11 Q. Have you been inside?

12 A. Yes.

13 Q. And how many occasions have you been inside  
14 that home?

15 A. The same, as far as picking up luggage, and  
16 that would be on a regular basis, you know, for a  
17 departure. We wouldn't always go to the house to pick  
18 up luggage, but it made it easier for loading the  
19 aircraft, getting it done prior to departure.

20 Q. Is that the only reason that you have ever  
21 gone to the Palm Beach home over the last 18 years, is  
22 to pick up luggage?

23 A. No.

24 Q. What other reasons have you gone there?

25 A. I've set up several home theater equipments,

15

1 you know, televisions and such.

2 Q. Is that another hobby or job or something of  
3 yours?

4 A. Both.

5 Q. Does he pay you for that?

6 A. Not any more than my salary.

7 Q. What's your current salary?

8 A. At this time, 180,000.

9 Q. And what are you paid \$180,000 to do?

10 A. To manage his aircraft.

11 Q. What does that entail?

12 A. Scheduling maintenance. Anything that has to  
13 do with any flight, whether it be weather, flight  
14 planning, time and distance to and from a location, any  
15 logistics involved in running an operation that has  
16 aircraft.

17 Q. In addition to the 180,000, does he give you  
18 bonuses as well?

19 A. There have been Christmas bonuses.

20 Q. Over the years, you mean, there have been  
21 Christmas bonuses?

22 A. Yes.

23 Q. Is 180,000 the most he's ever paid you?

24 A. No.

25 Q. All right. Were you making -- when was the

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1 last time that you were making an amount different than  
2 180,000?

3 A. Last year.

4 Q. That would be 2008?

5 A. That would be correct. Yeah, we all took a  
6 salary cut, I don't know the exact date. It might have  
7 been 2008, last year. It was last Christmas we all took  
8 a 10 percent salary cut.

9 Q. Do you know why?

10 A. Economic reasons.

11 Q. And who told you that you were going to have  
12 to take the salary cut?

13 A. Darren Indyke.

14 Q. And did you ask for an explanation?

15 A. He explained it was due to economic reasons  
16 throughout the country.

17 Q. Okay. So in 2008, how much was -- were you  
18 being paid by NES, LLC?

19 A. 200,000.

20 Q. And is 200,000 the most that you've ever made  
21 from NES, LLC?

22 A. Yes, sir.

23 Q. And on top of that \$200,000, did you get a  
24 bonus that year as well?

25 MR. REINHART: Which year are you talking



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1 about?

2 MR. EDWARDS: 2008.

3 THE WITNESS: That year, I think we skipped  
4 Christmas bonuses that year. The last bonus might  
5 have been 2007.

6 BY MR. EDWARDS:

7 Q. If you ever got a bonus from Mr. Epstein --  
8 and I'm only deriving this from you using the term  
9 "Christmas bonus."

10 A. Holiday bonus.

11 Q. -- am I correct to assume -- sorry. Am I  
12 correct to assume that if you got a bonus, there was  
13 only one and it was at the end of the year, around the  
14 holidays?

15 A. Yes.

16 Q. Okay. And how much was the 2007 holiday  
17 bonus?

18 A. I'd have to ask my wife, to be honest. I  
19 haven't seen my paycheck in 27 years, so I believe it  
20 was \$10,000.

21 Q. And in 2007 you also made \$200,000?

22 A. Yes.

23 Q. Okay.

24 A. With a question mark. I'm trying to be as  
25 accurate as I can, but yes.



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1 Q. Something pretty close to that?

2 A. Yes, sir.

3 Q. Okay. So with the bonus it was 210,000,  
4 roughly?

5 A. Right.

6 Q. Okay. And how long were you making that  
7 salary?

8 A. Probably -- he was very religious about giving  
9 annual increases, so I would probably say 2006, you  
10 know, it was -- we would get increment -- increases of  
11 five or \$10,000 each year. So I would say 2006. So it  
12 graduated, you know, progressive.

13 Q. Okay. Do you remember the progression if we  
14 start at 1991? Do you remember roughly what the  
15 progression was up through 2007/2008, when you were  
16 making \$200,000?

17 A. No, I wouldn't know the progression.

18 Q. Okay. Do you remember what you were making  
19 from -- and was NES, LLC the company paying you back in  
20 1991?

21 A. I don't know. I don't remember. Let me say  
22 it that way. I don't remember.

23 Q. Okay. When -- how long do you remember NES,  
24 LLC being the payer of your check?

25 A. Personally, two years, because I've never seen



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1 my paycheck. So I don't even know what's written on the  
2 top of it.

3 Q. That would be something that only your wife  
4 would see, I'm assuming?

5 A. You're right, since she probably wouldn't know  
6 the answer either, because she's looking at the right  
7 column and not the top column.

8 Q. Right. When is the first time that you had  
9 heard the name NES, LLC, that company?

10 A. Five, six years, and even questioned what it  
11 stood for. And I think to this day I couldn't answer  
12 that honestly, what it stands for.

13 Q. Okay. But it's your understanding that the  
14 NES, LLC is paying you for the work that you do as a  
15 pilot or maintain the planes for Jeffrey Epstein?

16 A. To my understanding, yes.

17 Q. And back in 1991, do you know if it was a  
18 different company that was paying you or if it was  
19 Jeffrey Epstein directly paying you?

20 A. I don't remember. I mean, I don't.

21 Q. Okay. Throughout your career with -- as a  
22 pilot for Jeffrey Epstein, since 1991, has there ever  
23 been a time when you believe you were paid directly from  
24 Jeffrey Epstein personally versus some company?

25 A. Not to my knowledge, no.

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1 Q. Okay. So whether it was NES, LLC or some  
2 other company, it was all of a sudden a company name, to  
3 the best of your knowledge?

4 A. Exactly, yes.

5 Q. And back in 1991, do you remember  
6 approximately how much you were being paid that year?

7 A. Fifty-five or 60,000, is maybe what I started.

8 Q. Okay.

9 A. You're going back a long ways.

10 Q. Yes.

11 A. I'm trying.

12 Q. Your relationship goes back that far. That's  
13 why I chose that year.

14 A. Right.

15 Q. Okay. Did you get bonuses even back that far?

16 A. Yes, sir.

17 Q. And do you remember what your bonuses were  
18 approximately?

19 A. 5,000. I mean, that was kind of the -- the  
20 starting point.

21 Q. Okay. In addition to monetary bonuses, were  
22 there ever gifts or any other type of compensation that  
23 NES, LLC or Jeffrey Epstein provided you?

24 A. Yes.

25 Q. And is that over the span of the 18 years?



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1 A. Yes.

2 Q. Okay. Tell me what some of those items are.

3 A. I remember one specifically was a pool heater.

4 Q. Excuse me?

5 A. A pool heater.

6 Q. When was that?

7 A. 1995-ish.

8 Q. Okay. Why did you get that?

9 A. I had built a pool and I didn't have a heater  
10 and he kind of laughed at me saying, "How can you have a  
11 pool without a heater?" So he says, "You ought to get a  
12 heater."

13 Q. Where were you when you had that conversation?

14 A. In the airplane.

15 Q. How did he know that you had built a pool?

16 A. Just in general conversation.

17 Q. You were having a conversation with Jeffrey  
18 Epstein?

19 A. Yes.

20 Q. And this is something that was happening on  
21 the airplane, this conversation?

22 A. During the flight. Yeah, it would have been  
23 like on cruise or something.

24 Q. Okay. When you say "during the flight," does  
25 that --

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1 A. Again, you're going back a long ways.

2 Q. I understand. We're talking about 1995 right  
3 now.

4 A. Yes.

5 Q. You're having a conversation with Jeffrey  
6 Epstein. Who is flying the airplane?

7 A. The auto pilot and there's two crew.

8 Q. Okay. So are you back in the back portion or  
9 is he up in the cockpit?

10 A. Up in the cockpit.

11 Q. Okay. Jeffrey Epstein sometimes comes up  
12 there?

13 A. Just, yeah, in between the two pilot seats.

14 Q. All right. Is that something that was  
15 typical, to have conversations like that?

16 A. Mm-hmm.

17 Q. Yes?

18 A. Yes. No nodding.

19 Q. And would those conversations be directed  
20 mainly with you or with the other pilots as well?

21 A. Mainly with me.

22 Q. I mean, you've kind of been described as the  
23 main guy or the main pilot. Wouldn't you consider that  
24 pretty much your role, right?

25 A. Well, that's chief pilot.



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1 Q. But more so than that, if there's going to be  
2 a casual conversation about a pool or a pool heater or  
3 whatever, it's going to be with you most likely if he's  
4 going to be talking to pilots, right?

5 MR. CRITTON: Form.

6 THE WITNESS: Right.

7 BY MR. EDWARDS:

8 Q. Okay. And you feel like over the years your  
9 relationship with Jeffrey Epstein has been pretty good?

10 A. Yes.

11 Q. And you have been closer to him over the years  
12 as you've grown to know him?

13 MR. CRITTON: Form.

14 THE WITNESS: The same throughout the same  
15 year. We never got any closer than 1991 than I am  
16 with him now. I'm very professional at what I do  
17 and know the line between being professional and  
18 thinking you're somebody's buddy.

19 BY MR. EDWARDS:

20 Q. Okay. So that's not something that you think  
21 you are? You don't think you're his buddy?

22 A. No, sir.

23 Q. Do you consider yourself his friend?

24 A. I believe so.

25 Q. Do you think he considers you his friend?



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1 A. I think so.

2 Q. All right. What makes you think that?

3 MR. CRITTON: Speculation.

4 THE WITNESS: He's always been kind and  
5 respectful.

6 BY MR. EDWARDS:

7 Q. Ever invited you to dinner?

8 A. No, sir.

9 Q. Have you ever associated or socialized with  
10 him during the day at any of his homes?

11 A. Only during a business reason.

12 Q. Okay. What are the other -- are the places  
13 that you believe that Mr. Epstein owns? I know we've  
14 talked about this Manhattan -- the Manhattan house.  
15 I've read the articles about it, the Palm Beach mansion.  
16 But what other places are you familiar with that  
17 Mr. Epstein owns?

18 MR. CRITTON: Form; predicate, speculation.

19 THE WITNESS: To answer it honestly, I don't  
20 know specifically that he owns any of the  
21 residences, to be honest. I would only assume that  
22 he owns. So if you want me to answer honestly, I  
23 don't know that he owns any of the other.

24 BY MR. EDWARDS:

25 Q. Okay. Well, what would be the basis for your



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1 assumption that he owns the home in Palm Beach?

2 A. He goes there, but I don't assume -- you don't  
3 have to own a house to go to it.

4 Q. And not only does he go there, you're aware  
5 that he spends the night there; he resides there  
6 sometimes, correct?

7 A. Yes.

8 Q. When he's in Palm Beach, that's where he --

9 A. He sleeps.

10 Q. -- sleeps? Right. When he's in New York, do  
11 you know where he sleeps?

12 A. No.

13 Q. But you've been to a particular house in New  
14 York that's a very large house that we've all read about  
15 that you picked up luggage at, right?

16 A. Yes, sir.

17 MR. CRITTON: Form.

18 BY MR. EDWARDS:

19 Q. And that home, do you know that -- I know that  
20 you're saying that you haven't done a public record  
21 search to make sure that Jeffrey Epstein owns it.

22 A. Yeah.

23 Q. But you assume that he does?

24 A. Assuming.

25 Q. That's where he sleeps when he's in New York?



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1 MR. CRITTON: Form.

2 THE WITNESS: I assume.

3 BY MR. EDWARDS:

4 Q. That's where his luggage is when you pick it  
5 up?

6 A. Doesn't mean he owns it.

7 Q. Right. But that's where it is?

8 A. Yes, sir.

9 Q. Do you know of anybody else who owns that home  
10 in New York?

11 A. No.

12 Q. Okay. Have you been to his ranch in New  
13 Mexico?

14 A. Yes.

15 MR. CRITTON: Form.

16 BY MR. EDWARDS:

17 Q. How many times have you been to his ranch in  
18 New Mexico?

19 MR. CRITTON: Form; predicate.

20 THE WITNESS: A guesstimate, fifty times, only  
21 due to the fact that we would fly there.

22 BY MR. EDWARDS:

23 Q. And where would you land?

24 A. Depending upon the aircraft, either  
25 Albuquerque or Santa Fe.

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1 Q. Are those private airports?

2 A. Public.

3 Q. Public, okay. Are there any private landing  
4 places where you would land any airplanes in New Mexico?

5 A. There are.

6 Q. That you have landed --

7 A. That I have.

8 Q. -- his airplane?

9 A. Yes.

10 Q. Where?

11 A. We have a 4500-foot strip on the ranch.

12 Q. When you say "we," yourself and somebody?

13 A. The company.

14 Q. What company?

15 A. Well, I should say -- I see where you're going  
16 with that. The ranch owns -- whoever owns the ranch.

17 The ranch has a runway on it.

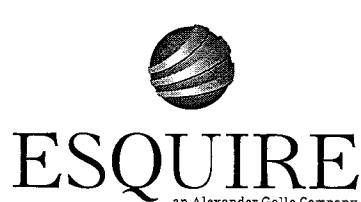
18 Q. Okay. And you've landed an airplane on that  
19 runway?

20 A. That ranch, yes.

21 Q. How many times do you think you've landed  
22 there?

23 A. Ten.

24 Q. All right. And have you been inside his  
25 ranch?



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1 A. Yes.

2 MR. CRITTON: Form to the last question.

3 MR. REINHART: Can you clarify, the physical  
4 ranch or the residences or the structures on the  
5 ranch?

6 MR. EDWARDS: I don't have a good visual  
7 appreciation for it.

8 BY MR. EDWARDS:

9 Q. Why don't you describe it in your words what  
10 this ranch that we are talking about looks like. And  
11 I've heard it referred to as the Zorro Ranch. Have you  
12 heard that?

13 A. I've heard that.

14 Q. That's the ranch we're all familiar with,  
15 we're talking about where the runway is and everything  
16 else?

17 A. Yes.

18 Q. Describe it in your own words, the landscaping  
19 of this ranch. What do we have on it?

20 A. There is a house up on the hill, a large  
21 house.

22 Q. How big?

23 A. Big. I've read 40,000 square feet in the  
24 paper.

25 Q. Have you been to it?

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1 A. Yes.

2 Q. Does that seem like it's feasible,  
3 approximately 40,000 --

4 A. I think so, yes.

5 Q. What else do we have on it?

6 A. There is a compound that has kind of motel  
7 room type -- they call it bunkhouse.

8 Q. Where's the bunkhouse located?

9 A. At the entrance to the ranch.

10 Q. Okay. And what is that primarily used for?

11 A. For the people that work on the ranch, they  
12 reside there. It's also a place where anybody that  
13 traveled on the airplane would stay. It's kind of like,  
14 you know, a hotel room.

15 Q. And how far is that from the first house that  
16 you described, the 40,000 square foot house?

17 A. It's probably 4 miles.

18 Q. Okay. So the Zorro Ranch is a rather large  
19 area of property?

20 A. Yes.

21 Q. And how many times -- I know we just talked  
22 about how many times you've been in the house, but how  
23 many times have you been on that ranch in New Mexico,  
24 the Zorro Ranch?

25 A. Thirty to fifty times over the years. That's



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1 a guesstimate.

2 Q. Is that over -- when was the first time that  
3 you went to that ranch?

4 A. A guess, I don't know when it was, actually,  
5 our first trip, but 1995/'94.

6 Q. Okay. And do you believe Jeffrey Epstein  
7 and/or a corporation owned or controlled by him to be  
8 the sole owner of that ranch?

9 A. I don't know any of those details.

10 Q. Have you ever talked to Jeffrey Epstein about  
11 who owns that ranch?

12 A. No.

13 Q. Do you know of anybody else who may own that  
14 ranch?

15 A. Not to my knowledge.

16 Q. Other than Jeffrey Epstein, do you know of  
17 anybody else who regularly stays there when they're in  
18 New Mexico?

19 A. Not to my knowledge.

20 Q. Does Jeffrey Epstein stay there when you're in  
21 New Mexico?

22 A. He has.

23 Q. And he has a key to the place?

24 A. I don't know if there's a key.

25 Q. One way or another, he gets in, right?

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1 A. Yes, sir.

2 Q. And he sleeps there?

3 A. Yes.

4 Q. Okay.

5 A. I assume he does.

6 Q. You assume he sleeps?

7 A. I do. I think.

8 Q. Okay.

9 MR. CRITTON: This is really --

10 BY MR. EDWARDS:

11 Q. Other than the pool heater in 1995, have you  
12 ever received any other gifts on top of the compensation  
13 from Mr. Epstein?

14 A. I did get land on the ranch to build a house.

15 Q. What do you mean you got land on the ranch?

16 A. He deeded me land to build a home.

17 Q. When was that?

18 A. Ten years ago at least.

19 Q. Do you know if he's ever deeded anyone else in  
20 this world land on the ranch to build a home?

21 A. Not to my knowledge.

22 Q. Why did he do that?

23 A. We would vacation out there and my wife fell  
24 in love with New Mexico and we were looking for  
25 property.

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1 Q. And did you talk to him about that?

2 A. Yes. He knew I -- he was aware I was looking  
3 for a home and he says, "Well, I have so much land, I  
4 could give you a spot to build a home on." So I built a  
5 house.

6 Q. So how long has a home actually been on that  
7 property?

8 A. Nine years.

9 Q. And that's a home that you own?

10 A. Yes, sir.

11 Q. And that's a home that was -- when I say "you  
12 own it," is there a mortgage on it or did he give it to  
13 you free and clear?

14 A. No, no, I paid for the house. I made payments  
15 on it.

16 Q. All right. So what did he actually give you?

17 A. 40-acres of land.

18 Q. That you did not have to pay for?

19 A. You know, I'd have to go back and look. I  
20 think it was -- I had to pay something for it. I don't  
21 remember.

22 Q. How often have you visited that piece -- that  
23 home that you own?

24 A. My wife would spend summers out there with the  
25 kids.



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1 Q. Okay. But that's on the Zorro Ranch?

2 A. Yes.

3 Q. So in addition to the 50 or so times you've  
4 been to the Zorro Ranch, you've been to your property  
5 that's on the Zorro Ranch?

6 A. Yes, which over the years, it's once-a-year  
7 visits. So I mean, it is included in the 50 times that  
8 I've been there.

9 Q. Okay. And did you have a conversation with  
10 him that led to him giving you or gifting you 40-acres  
11 of land?

12 A. We talked about it because he knew I was  
13 looking for a home out there.

14 Q. Okay. In gifting you that land, did you  
15 consider yourself at that point in time to be more than  
16 just his pilot, as more of a friend?

17 A. No. You're using the word "gifting." I paid  
18 for the land. I don't recall what it was. But you use  
19 the word "friend." I don't know that a -- sure, he was  
20 a friend. I mean...

21 Q. Well, did he give Dave Rogers any land out on  
22 the New Mexico ranch?

23 A. No.

24 Q. Okay. When you say you paid for it, I thought  
25 that I asked that question, "Did you pay for the



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1 40-acres?" I thought your answer was, "I don't know,  
2 I'd have to go back and look."

3 Are you saying now that you did pay for that  
4 land?

5 A. I don't remember. If there was a sum of  
6 money, it was just for, you know, the legal purpose of a  
7 transfer of ownership of the land.

8 Q. Okay. If it was a substantial amount of  
9 money, that's something that you would have remembered?

10 A. Oh, exactly. No, it was not a substantial  
11 amount.

12 Q. Okay. Do you remember approximately how much  
13 money you had to give Jeffrey Epstein for that land?

14 A. I would only be guessing. It might have been  
15 five dollars. To my knowledge, I don't remember.

16 Q. Okay. So when I'm saying he gave you the  
17 land, he may have actually given you the land?

18 A. Sure.

19 Q. Okay. And to the best of your knowledge, he's  
20 never given anyone else land out there?

21 A. Not to my knowledge.

22 MR. CRITTON: Form.

23 BY MR. EDWARDS:

24 Q. All right. How big is this house that you  
25 built on the ranch?



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1 A. 1800 square feet.

2 Q. Were you ever at that house at the same time  
3 when he's at his house that's on that Zorro Ranch?

4 A. Yes.

5 Q. All right. We started back in 1991 with you  
6 making around \$55,000 a year and that has progressed  
7 over time to a point where in 2007 you were making  
8 \$200,000 a year. I don't want to go through every  
9 single year; that would take a really long time. But  
10 the progression, was that on a yearly basis normally or  
11 after two years or three years?

12 A. Yearly basis.

13 Q. Okay. And would that normally be in  
14 increments of?

15 A. \$5,000.

16 Q. Okay. You've talked about a couple other  
17 gifts that have been given to you from Jeffrey Epstein  
18 over the years; one is a pool heater in 1995 and now  
19 some 40 acres of land on his New Mexico ranch. Any  
20 other gifts you can think about?

21 A. No other gifts.

22 Q. Okay. I don't want to split hairs with you.  
23 You obviously thought about that answer before giving  
24 it. What other items are you thinking about that he's  
25 given to you or cut you a discount on or otherwise that



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1 you feel was compensation for you working for him?

2 A. I drive a company car. I mean...

3 Q. Okay. What kind of car?

4 A. A Hummer.

5 Q. You say "a company car." That's owned by NES,  
6 LLC?

7 A. No, I think the registration has Zorro  
8 Development on it.

9 Q. What is Zorro Development?

10 A. I believe that's the ranch, or at least it has  
11 the name of the ranch. I don't know what the entity is.

12 Q. And it's your understanding that that's a  
13 company vehicle?

14 A. Yes.

15 Q. And where is that vehicle primarily garaged?

16 A. At my home.

17 Q. In West Palm Beach or in the Zorro Ranch?

18 A. No, here in West Palm Beach.

19 Q. All right. And is there only one company  
20 vehicle that you're issued?

21 A. Yes, sir.

22 Q. And is that something that was -- that you did  
23 not have to pay for?

24 A. No, it's just something I drive. I mean, it's  
25 not titled to me or anything like that. It's just a car

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1 that I drive.

2 Q. All right. You've worked for him for 18  
3 years. I don't even know how long the Hummer would  
4 last, but presumably, that's not the car you've had over  
5 the entire 18 years. Have you always had a company car?

6 A. No, I haven't, no.

7 Q. When did you get the Hummer?

8 A. Probably three years ago.

9 Q. Do any other members of Mr. Epstein's piloting  
10 team have company cars?

11 A. No.

12 Q. Only you?

13 A. Yes.

14 Q. And do you know how that decision was made to  
15 get you a company vehicle?

16 A. No.

17 Q. What do you use that vehicle for?

18 A. To and from the airport.

19 Q. All right. Do you use it for personal reasons  
20 also?

21 A. I guess, yes.

22 Q. I mean, that's your primary vehicle?

23 A. Yes, or I drive my wife's car.

24 Q. Which is?

25 A. Type of car?

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1 Q. Yes.

2 A. A Mercedes.

3 Q. And is that something that was also a gift  
4 from Mr. Epstein?

5 A. No, sir.

6 Q. What type of Mercedes is that?

7 A. A ML 430, ten years old.

8 Q. All right. Are there any other items --  
9 company car, the land in New Mexico, the pool heater --  
10 any other items that Mr. Epstein has given you over time  
11 as compensation or reward or anything else?

12 A. No, sir.

13 Q. And your only income is from Mr. Epstein or  
14 his companies?

15 A. Correct.

16 Q. Okay. And it's been that way since 1991?

17 A. Yes.

18 Q. How did you meet Mr. Epstein or become  
19 involved with him in 1991?

20 A. We heard at the airport that Mr. Epstein was  
21 purchasing an airplane when Dave Rogers and myself were  
22 living in Columbus, and we had the opportunity to  
23 interview with him, and we did and got the job.

24 Q. And this is before he owned the airplane?

25 A. Yes.



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1 Q. And which airplane was that?

2 A. The Hawker.

3 Q. Does he still have the Hawker?

4 A. No.

5 Q. How long did he have that plane?

6 A. Five years, guesstimate; four or five years.

7 Q. So sometime in the mid '90s?

8 A. Yes.

9 Q. Did you keep any type of logs or documentation  
10 as to who would have been flying on that airplane if you  
11 transported any individuals?

12 A. The same logs as you possess now are the  
13 flight logs.

14 Q. Okay.

15 A. That's the standard for the industry.

16 Q. So that's something that you kept, or that  
17 Dave Rogers kept?

18 A. Dave Rogers.

19 Q. Okay. If there are any documents out there  
20 with names of passengers on any of the flights involving  
21 planes owned or controlled by Jeffrey Epstein and/or his  
22 companies, those would be documents in the possession of  
23 Dave Rogers and not yourself?

24 A. Oh, the corporation actually, they belong to.

25 Q. Okay.



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1 MR. REINHART: That was a compound question.

2 You might want to split it in half.

3 MR. EDWARDS: Okay.

4 BY MR. EDWARDS:

5 Q. What documents do you believe exist that  
6 indicate names of individuals that have been passengers  
7 on Mr. Epstein's airplanes?

8 MR. REINHART: Are we going back all the way  
9 from '91 to the present?

10 MR. EDWARDS: Sure.

11 THE WITNESS: You're talking about the Hawker?

12 BY MR. EDWARDS:

13 Q. Any airplanes. What documents would there be?

14 A. There would be the same: Flight logs and  
15 passenger manifests would exist.

16 Q. And are either of those required?

17 A. The flight log is required for the aircraft to  
18 track times and landings.

19 Q. And in the flight log, is it required that you  
20 designate the names of the passengers?

21 A. No.

22 Q. That's just something that Dave Rogers did on  
23 his own?

24 A. Everybody does that. It's more for Internal  
25 Revenue.

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1 Q. Okay. If something happens, they know who is  
2 on the plane?

3 A. Exactly, weight and balance.

4 Q. Have you ever kept any flight logs that have  
5 names of people on the airplane?

6 A. When you say "kept," I have filled out flight  
7 logs or the passenger manifest, yes.

8 Q. By "kept" I meant maintained to where they're  
9 in your possession either on paper or computer?

10 A. We keep --

11 MR. REINHART: Can you differentiate a flight  
12 log from the pilot's log that we showed you  
13 earlier?

14 MR. EDWARDS: Okay.

15 BY MR. EDWARDS:

16 Q. I'm talking about -- I don't know that it's  
17 called a flight log, a pilot's log or any kind of log.

18 A. They are different, yes.

19 Q. Yeah. I'm asking about, have you kept or do  
20 you have any documentation that would indicate the names  
21 of passengers that have flown on any of Jeffrey  
22 Epstein's planes?

23 A. No.

24 Q. Either in the form of paper or on a computer?

25 A. No.



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1 Q. Makes that easy.

2 A. Okay.

3 Q. In 1991, were you the chief pilot?

4 A. No.

5 Q. Somebody else was the chief pilot?

6 A. Yes.

7 Q. Who's that?

8 A. Dave Rogers.

9 Q. All right. At what point in time did you  
10 become chief pilot and switched with Dave Rogers?

11 A. Six years ago; five, six years ago.

12 Q. Why?

13 A. Professionalism, technique.

14 Q. What do you mean by that?

15 A. The way Dave would operate an aircraft,  
16 Jeffrey knew the difference when I was flying and when  
17 Dave was flying.

18 Q. How do you know he knew the difference?

19 A. Just --

20 Q. He told you?

21 A. Yes. He knew the difference that if he never  
22 came up front, he knew who was flying, who landed.

23 Q. And what was the conversation that he had with  
24 you that resulted in you becoming chief pilot, switching  
25 positions with Dave Rogers?

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1           A. Jeffrey would always critique Dave's flying  
2           capabilities, and I tried to help Dave and explain to  
3           him what Jeffrey likes and doesn't like. And Jeffrey's  
4           also conveyed these likes and dislikes. And Dave  
5           maintained continuing with certain piloting techniques  
6           that were just not comfortable to passengers. And this  
7           went on through the years, and Jeffrey just got tired of  
8           it one day.

9           Q. What specifically were Jeffrey Epstein's likes  
10          and dislikes with respect to the flight of the plane?

11          MR. CRITTON: Let me put in a form here. But  
12          I don't know what this has to do with anything in  
13          this case.

14          MR. EDWARDS: I understand that, Bob.

15          MR. CRITTON: I want to use this for some  
16          other depositions where we -- we've gone beyond the  
17          scope.

18          THE WITNESS: The case in point, the last  
19          straw was there was a technique called quiet flying  
20          where you would retard the throttles well short of  
21          the runway and pretty much glide the airplane in.  
22          Well, if you don't do that correctly, you have to  
23          spool the engines up just prior to touching down  
24          that -- because you're losing air speed and it's an  
25          uncomfortable sound and feeling for the passengers



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1 thinking that you're not going to make the runway.  
2 And it was a continuous practice of Dave doing that  
3 to be neighbor friendly as opposed to being  
4 passenger-comfort friendly.

5 BY MR. EDWARDS:

6 Q. Okay.

7 A. Hence, the transfer of power.

8 Q. Has he ever discussed with you where he wants  
9 you to be, whether that is "stay in the cockpit when I  
10 have people on the airplane," or don't intermingle with  
11 the passengers or anything else?

12 A. He's never stated that to us.

13 MR. REINHART: Could you clarify which "he"  
14 you're talking about?

15 MR. EDWARDS: I'm talking about Jeffrey  
16 Epstein.

17 MR. REINHART: Okay.

18 BY MR. EDWARDS:

19 Q. You understood that?

20 A. Yes.

21 Q. It's my understanding that in the -- well,  
22 tell me other than the Hawker, what other airplanes have  
23 you flown for Jeffrey Epstein?

24 A. A Gulfstream.

25 Q. Does he still have that plane?

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1 A. Yes, sir.

2 Q. How big of a plane is that?

3 A. Large corporate jet.

4 Q. How long has he had it?

5 A. Fourteen years; 13, 14 years.

6 Q. And other than the Gulfstream, what other  
7 airplanes does he have?

8 A. When you say "he," obviously, these are  
9 company-owned --

10 Q. Jeffrey Epstein or his companies.

11 A. A Boeing 727.

12 Q. Well, I know that's a very large airplane. I  
13 think that's been described by other people, so I'm not  
14 going to have you do that. But there's partitions in  
15 that airplane -- in the back rooms of that airplane,  
16 right?

17 A. Yes.

18 Q. Several different partitions to where if the  
19 pilot comes out of the cockpit, you don't necessarily  
20 see all the passengers?

21 A. Yes.

22 Q. That's true?

23 A. Yes.

24 Q. Okay.

25 MR. REINHART: Keep your voice up so she can



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1 hear you.

2 THE WITNESS: Oh.

3 MR. REINHART: And so Mr. Willits can hear  
4 you.

5 BY MR. EDWARDS:

6 Q. Other than the Gulfstream and the Boeing and  
7 the Hawker, what other airplanes has Jeffrey Epstein  
8 owned over the years?

9 A. That is it.

10 Q. And currently still owns -- or the companies  
11 associated with him own the Gulfstream and the Boeing?

12 A. Yes.

13 Q. And in the past two years, have you flown  
14 those two airplanes?

15 A. Just for routine flights to keep them loose  
16 or, you know -- you know what I mean.

17 Q. Have those two airplanes been flown by anyone  
18 else in the last two years?

19 A. No.

20 Q. Have those two airplanes been flown in the  
21 last two years for any reason other than routine  
22 maintenance-type flights?

23 A. We've had one -- two flights I think in the  
24 past two years.

25 Q. And what were the purposes of those flights

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1 and who was on the flights?

2 A. One flight I believe we went to Sebring and  
3 another flight we went to Nassau, Bahamas.

4 Q. And who did you go to Nassau, Bahamas with?

5 A. I'd have to look at the flight log, but I  
6 think it was Sarah, Story and Nadia, I believe. I think  
7 that was the three passengers, to the best of my  
8 knowledge.

9 Q. And it's my understanding that little  
10 St. James is an island that Jeffrey Epstein owns or  
11 controls?

12 MR. CRITTON: Form.

13 THE WITNESS: I don't know that he owns it.  
14 BY MR. EDWARDS:

15 Q. Has he ever been to an island called Little  
16 St. James?

17 A. Yes.

18 Q. And have you been there with Jeffrey Epstein?

19 A. I've been there when he was there.

20 Q. Have you flown on an airplane with him to that  
21 destination?

22 A. No.

23 Q. All right. When you say you've been there  
24 when he was there, how did that come about?

25 A. We flew into St. Thomas and then we flew to



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1 Little St. James in a helicopter.

2 Q. And do you fly the helicopter as well?

3 A. Yes.

4 Q. How many helicopters are owned or controlled  
5 by Jeffrey Epstein and/or corporations associated with  
6 him?

7 MR. CRITTON: Form.

8 THE WITNESS: At this time, one.

9 BY MR. EDWARDS:

10 Q. And has that helicopter been flown in the last  
11 two years?

12 A. Just for routine maintenance.

13 Q. And when you and -- let's say when Sarah  
14 Kellen and Story Cowells and Nadia flew to Nassau, do  
15 you know the purpose of that trip?

16 A. No.

17 Q. How long did you stay?

18 A. Five hours.

19 Q. Did you pick anybody up there?

20 A. No. Meaning passengers?

21 Q. Yes.

22 A. No.

23 Q. What happened? You landed the airplane and  
24 then what?

25 A. The passengers left. Dave and I went and had

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1 lunch. The passengers showed up and we came back.

2 Q. Have you ever stayed at the home that is on  
3 Little St. James?

4 A. No.

5 Q. Have you known Jeffrey Epstein to stay at that  
6 home?

7 A. I don't know that for a fact.

8 Q. Okay. Do you believe that he is the owner or  
9 controller or has some interest in the home or the  
10 island of Little St. James?

11 MR. CRITTON: Form.

12 THE WITNESS: I have no knowledge of that  
13 being a fact.

14 BY MR. EDWARDS:

15 Q. And you have no belief that that is a fact?

16 A. Exactly.

17 Q. When you say you've been there when he was  
18 there, how many times has that occurred?

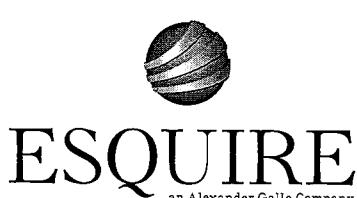
19 A. Estimating, a hundred times.

20 Q. Okay.

21 A. Trying to give an honest answer.

22 Q. Okay. And in the approximate -- I'm not going  
23 to hold you to a hundred times, but in the approximately  
24 hundred times --

25 A. Sure.



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1 Q. -- for what period of time are we talking  
2 about?

3 A. During what period of time?

4 Q. Right.

5 A. Let's see, when did all this happen? What,  
6 2007? So eight years prior to whenever he stopped  
7 flying. So...

8 Q. '98/'99?

9 A. Yeah, I guess, yes.

10 Q. I mean, that sounds like a right --

11 A. Sounds about right, yeah. Don't hold me to it  
12 again.

13 Q. All right.

14 A. You're going back a long way.

15 Q. So from approximately the '98/'99 time frame  
16 when Jeffrey Epstein would fly to Little St. James,  
17 would you be the pilot?

18 A. Yes.

19 Q. Okay. And you say that you've been there -- I  
20 thought that you just told me that you've been there the  
21 same time he was there, but then I thought the  
22 subsequent question was well, were you on the flight  
23 with him, and I thought your answer was no. Maybe I  
24 misunderstood that.

25 A. No, you said the question "Have you ever flown



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1 to his island?" We never landed on his island. We  
2 landed in St. Thomas.

3 Q. Got it.

4 A. I was just trying to be exact.

5 Q. Thank you.

6 A. It's a small island.

7 Q. Okay. So how is it that when Mr. Epstein  
8 wants to go to Little St. James, what is the path that  
9 you take to get actually to the island of Little  
10 St. James?

11 A. I don't understand the question.

12 Q. Well, you just told me you fly the airplane to  
13 St. Thomas?

14 A. Right.

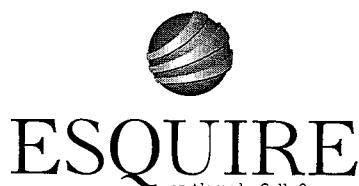
15 Q. And then what?

16 A. Then sometimes I would go get the helicopter  
17 or he could also take a boat to the island. But  
18 normally the helicopter's located on St. Thomas. I'd  
19 fire up the helicopter, come pick him up, drop him at  
20 the island and I come back to St. Thomas.

21 Q. And when he stays on St. James, you drop him  
22 off on St. James. I suppose you're going to tell me you  
23 don't know if he stays there or not?

24 A. Exactly.

25 Q. But do you stay --



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1 A. I don't. I mean --

2 Q. Well, he either stays there or someone else  
3 picks him up in a helicopter or he swims away?

4 A. Correct.

5 Q. Okay. You stay on St. Thomas?

6 A. Yes.

7 Q. Okay. Is there a place that you've stayed on  
8 St. James, ever?

9 A. No, I've never.

10 Q. So in the hundred or more times that you've  
11 been to the island, is it my understanding that each of  
12 those times you've been there to drop off Jeffrey  
13 Epstein and/or any passengers and you've immediately  
14 left and gone to St. Thomas?

15 A. Yes, sir.

16 Q. You never been inside that home that's located  
17 on St. James?

18 A. Yes, I've been inside the home.

19 Q. How many times have you been inside the home?

20 A. I mean, ten, fifteen times.

21 Q. And for what occasion?

22 A. I've set up the theater system that's in the  
23 living room.

24 Q. Okay.

25 A. So it would be there to work to hook up a TV

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1 or a stereo.

2 Q. And do you know Les Wexler?

3 A. No, I don't.

4 Q. Have you ever met him before?

5 A. I have met him.

6 Q. Do you know of any relationship between Les  
7 Wexler and Jeffrey Epstein?

8 A. I don't know what -- to what extent they have  
9 a relationship, no.

10 Q. Do you know if they know one another?

11 A. I don't know that for a fact. They talk to  
12 one another, so I would assume. But I don't know to --

13 Q. How do you know they talk to one another?

14 A. I've seen them speak to one another at the  
15 foot of the airplane.

16 Q. All right. Have you ever flown the  
17 airplane -- any of the airplanes with Les Wexler as a  
18 passenger?

19 A. No.

20 Q. Have you ever flown the airplanes with Sarah  
21 Kellen as a passenger?

22 A. Yes.

23 Q. And do you know Sarah Kellen?

24 A. Yes.

25 Q. And for how long have you known Sarah Kellen?

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1 A. I'm guessing, six years. I mean, don't hold  
2 me to it. I'm not the greatest on length of times, but  
3 six, seven years, I think.

4 Q. How did you meet her?

5 A. I guess I was introduced. She was on a flight  
6 of ours.

7 Q. You were introduced to her by whom?

8 A. She may have introduced herself. I mean,  
9 you're going back a ways. I don't know the official  
10 introduction, how it went.

11 Q. And to your knowledge, what is her -- is she  
12 associated or affiliated in some way with Jeffrey  
13 Epstein?

14 MR. CRITTON: Form.

15 THE WITNESS: I would assume so. I don't know  
16 to what level or what actually her job description  
17 is.

18 BY MR. EDWARDS:

19 Q. All right. Well, how many flights have you  
20 flown where she and Jeffrey Epstein have been passengers  
21 together on one of the airplanes that we've been  
22 discussing?

23 A. I'd only be guessing again.

24 Q. We're talking hundreds of flights, though?

25 A. Sure, sure, a lot of flights.



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1 Q. It seems to be -- I mean, you seem like  
2 somebody who has common sense. It seems like somebody  
3 that knows Jeffrey Epstein?

4 MR. CRITTON: Form.

5 BY MR. EDWARDS:

6 Q. Correct, Sarah Kellen?

7 A. Yes.

8 Q. All right. And do you believe that there is a  
9 business relationship there or a personal relationship  
10 there, from your observations?

11 A. I'd only be speculating. When they get on the  
12 airplane, my focus is forward and flying safely. So I  
13 don't -- you know, I'd only be guessing at either one of  
14 those two.

15 Q. Okay. Have you ever socialized with Sarah  
16 Kellen?

17 A. No.

18 Q. Other than speaking with her on the airplane,  
19 have you spoken with her elsewhere?

20 A. Over the phone, in passing, I mean, walking  
21 down the street in New York. I mean, yes.

22 Q. Why would you call Sarah Kellen or why would  
23 she call you?

24 A. She would call me to schedule the aircraft for  
25 a departure.

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1 Q. And have you ever called her?

2 A. Yes.

3 Q. When's the last time you talked to Sarah  
4 Kellen?

5 A. A week ago.

6 Q. What was the occasion?

7 A. We were discussing carpet for one of the  
8 aircraft.

9 Q. And where was she when you were talking with  
10 her?

11 A. I don't know. It was over the phone.

12 Q. Did she call you or you call her?

13 A. No, I called her on her cell.

14 Q. Okay. And that's a New York number?

15 A. I don't know. It's on speed dial.

16 Q. Do you have your phone with you?

17 A. Yes.

18 Q. Could you tell me what that number is?

19 A. Sure.

20 Q. Thanks.

21 A. Sure. (917) 855-3363.

22 Q. Which airplane were you discussing carpeting  
23 for?

24 A. Was actually -- actually, it was for the  
25 helicopter. Now that I'm thinking about it, the