

# EXHIBIT 13

## PART 1

1                   UNITED STATES DISTRICT COURT  
2                   SOUTHERN DISTRICT OF FLORIDA

3    JANE DOE NO. 2,                           Case No: 08-CV-80119  
4                   Plaintiff,  
5                   Vs  
6    JEFFREY EPSTEIN,  
7                   Defendant.

8                   \_\_\_\_\_/  
9    JANE DOE NO. 3,                           Case NO: 08-CV-80232  
10                   Plaintiff,  
11                   Vs  
12    JEFFREY EPSTEIN,  
13                   Defendant.

14                   \_\_\_\_\_/  
15    JANE DOE NO. 4,                           Case No: 08-CV-80380  
16                   Plaintiff,  
17                   Vs.  
18    JEFFREY EPSTEIN,  
19                   Defendant.

20                   \_\_\_\_\_/  
21    JANE DOE NO. 5,                           Case No: 08-CV-80381  
22                   Plaintiff,  
23                   Vs  
24    JEFFREY EPSTEIN,  
25                   Defendant.

<p>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</p>	<p>Page 2</p> <p>1 V I D E O T A P E D  2 D E P O S I T I O N  3 o f  4 A L F R E D O R O D R I G U E Z  5  6 taken on behalf of the Plaintiffs pursuant  7 to a Re-Notice of Taking Deposition (Duces Tecum)  8  9 - - -  10 APPEARANCES:  11  12 M E R M E L S T E I N &amp; H O R O W I T Z , P . A .  13 B Y : S T U A R T M E R M E L S T E I N , E S Q .  14 18205 Biscayne Boulevard  15 Suite 2218  16 Miami, Florida 33160  17 Attorney for Jane Doe 2, 3, 4, 5,  18 6, and 7.  19 R O T H S T E I N R O S E N F E L D T A D L E R  20 B Y : B R A D J . E D W A R D S , E S Q . , a n d  21 C A R A H O L M E S , E S Q .  22 L a s O l a s C i t y C e n t r e  23 S u i t e 1 6 5 0  24 401 E a s t L a s O l a s B o u l e v a r d  25 F o r t L a u d e r d a l e , F l o r i d a 3 3 3 0 1  26 A t t o r n e y f o r J a n e D o e a n d E . W .  27 A n d L . M .  28 P O D H U R S T O R S E C K  29 B Y : K A T H E R I N E W . E Z E L L  30 25 W e s t F l a g l e r S t r e e t  31 S u i t e 8 0 0  32 M i a m i , F l o r i d a 3 3 1 3 0  33 A t t o r n e y f o r J a n e D o e 1 0 1 a n d 1 0 2 .  34</p>
<p>1 JANE DOE NO. 11, 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</p>	<p>Page 3</p> <p>1 APPEARANCES:  2  3 L E O P O L D - K U V I N  4 A D A M J . L A N G I N O , E S Q .  5 2 9 2 5 P G A B o u l e v a r d  6 S u i t e 2 0 0  7 P a l m B e a c h G a r d e n s , F l o r i d a 3 3 4 1 0  8 A t t o r n e y f o r B . B .  9  10 R I C H A R D W I L L I T S , E S Q .  11 2 2 9 0 1 0 t h A v e n u e N o r t h  12 S u i t e 4 0 4  13 L a k e W o r t h , F l o r i d a 3 3 4 6 1  14 A t t o r n e y f o r C . M . A .  15  16 B U R M A N , C R I T T O N , L U T T I E R &amp;  17 C O L E M A N , L L P  18 B Y : R O B E R T C R I T T O N , E S Q .  19 5 1 5 N o r t h F l a g l e r D r i v e  20 S u i t e 4 0 0  21 W e s t P a l m B e a c h , F l o r i d a 3 3 4 0 1  22 A t t o r n e y f o r J e f f r e y E p s t e i n .  23  24  25  26  27  28  29  30  31  32  33  34  35  36  37  38  39  40  41  42  43  44  45  46  47  48  49  50  51  52  53  54  55  56  57  58  59  60  61  62  63  64  65  66  67  68  69  70  71  72  73  74  75  76  77  78  79  80  81  82  83  84  85  86  87  88  89  90  91  92  93  94  95  96  97  98  99  100  101  102  103  104  105  106  107  108  109  110  111  112  113  114  115  116  117  118  119  120  121  122  123  124  125  126  127  128  129  130  131  132  133  134  135  136  137  138  139  140  141  142  143  144  145  146  147  148  149  150  151  152  153  154  155  156  157  158  159  160  161  162  163  164  165  166  167  168  169  170  171  172  173  174  175  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3	ALFREDO RODRIGUEZ		
4	(By Mr. Mermelstein) 12		
5	(By Mr. Edwards) 157		
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1	Doe right here on the copy you gave me. I'm		
2	missing which Jane Doe this is.		
3	They're all different case numbers. Do		
4	you want me to go through each case number?		
5	MR. CRITTON: I'm going to note my		
6	objection. Obviously if this deposition		
7	gets played -- not obviously, I'm going to		
8	object to the litany of each one so I don't		
9	know how we can separate it out. Maybe if		
10	and when at the time of trial and depending		
11	on how the Court determines what comes in		
12	and what doesn't with regard to the		
13	consolidated aspects of this. I have no		
14	great idea other than just saying Jane Doe		
15	versus Epstein, et al, or something like		
16	that, or Jane Doe, et al.		
17	MS. EZELL: Couldn't we just say and		
18	those cases which have been consolidated		
19	with it for Discovery purposes?		
20	MR. EDWARDS: Although there is cases		
21	here that have cross noticed this from state		
22	court that haven't been consolidated so that		
23	may not work. You may have to read them		
24	all, if it works out your way that will just		
25	get edited out, at least he will have read		
		Page 7	
1	Deposition taken before MICHELLE PAYNE, Court		
2	Reporter and Notary Public in and for the State of		
3	Florida at Large, in the above cause.		
4	- - -		
5	THE VIDEOGRAPHER: This is the case of		
6	Jane Doe No. 2, plaintiff, versus Jeffrey		
7	Epstein, defendant. Jane Doe No. 3,		
8	plaintiff, versus Jeffrey Epstein,		
9	defendant. Jane Doe No. 4, plaintiff,		
10	versus Jeffrey Epstein, defendant. And Jane		
11	Doe No. 5, plaintiff, versus Jeffrey		
12	Epstein, defendant. Jane Doe No. 6,		
13	plaintiff, versus Jeffrey Epstein,		
14	defendant. Jane Doe No. 7, plaintiff,		
15	versus Jeffrey Epstein, defendant. CMA,		
16	plaintiff, versus Jeffrey Epstein,		
17	defendant. And Jane Doe, plaintiff, versus		
18	Jeffrey Epstein, et al, defendant. And Jane		
19	Doe -- is there a shorter thing that we can		
20	do here? It's also missing this one right		
21	here.		
22	MR. MERMELSTEIN: Do we have a problem		
23	with saying Jane Doe 2 and the Epstein and		
24	related cases?		
25	THE VIDEOGRAPHER: I'm missing this Jane		
			Page 9
1	that caption, every caption. Right? Is		
2	there a better suggestion?		
3	MR. CRITTON: No. There may be a better		
4	suggestion if he starts this is such and		
5	such day, it's the deposition of Mr.		
6	Rodriguez in the case such and such, and we		
7	can almost fill it in depending on which		
8	tape it goes, how it fills in, at least		
9	we'll have the context of the first and		
10	depending on whether the Judge reads it in		
11	from a consolidated or they all come		
12	related, I have no great idea.		
13	MR. EDWARDS: I was thinking if he read		
14	every one of them and it was the seventh in		
15	line then you just would edit it so you		
16	would only read that one.		
17	MR. CRITTON: I'm okay with that too.		
18	THE VIDEOGRAPHER: On page number three		
19	there is something missing on the top here.		
20	Do you want me to read each case number		
21	separately?		
22	MR. MERMELSTEIN: I don't think it's		
23	necessary.		
24	MR. EDWARDS: I don't think it's		
25	necessary either.		

3 (Pages 6 to 9)

<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>Page 10  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>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>Page 11  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>

<p style="text-align: right;">Page 14</p> <p>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</p>	<p style="text-align: right;">Page 16</p> <p>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?</p>
<p style="text-align: right;">Page 15</p> <p>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?</p>	<p style="text-align: right;">Page 17</p> <p>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.</p>

<p style="text-align: right;">Page 18</p> <p>1 Q. And how often did he indicate he would be 2 in Palm Beach?</p> <p>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.</p> <p>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.</p> <p>9 By the way, have you had your deposition 10 taken before?</p> <p>11 A. I was subpoena by the State Attorney in 12 Palm Beach but not here.</p> <p>13 Q. Did you give a transcribed statement to 14 the State Attorney?</p> <p>15 A. I believe it was recorded. I don't know 16 with this method but it was recorded.</p> <p>17 Q. With a tape machine?</p> <p>18 A. Yeah.</p> <p>19 Q. Now, after you were interviewed did he 20 give you the job on the spot or did he call you 21 afterward?</p> <p>22 A. He hired me on the spot.</p> <p>23 Q. What was your salary?</p> <p>24 A. 55,000.</p> <p>25 Q. And when did you start to work for him?</p>	<p style="text-align: right;">Page 20</p> <p>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.</p> <p>10 Q. So he would give you instructions himself 11 personally?</p> <p>12 A. Secretary.</p> <p>13 Q. Okay. Now, let's go through who the 14 household staff was at the time that you started.</p> <p>15 Who would you say worked under your 16 supervision as the household manager?</p> <p>17 A. It was a Filipino lady by the name of 18 Louella. I don't recall her last name.</p> <p>19 Q. Louella Rabuyo?</p> <p>20 A. Yes, exactly, yes.</p> <p>21 Q. What did she do?</p> <p>22 A. She would be the housekeeper in charge of 23 the laundry, cleaning the household, everything 24 inside the house.</p> <p>25 Q. And who else?</p>
<p style="text-align: right;">Page 19</p> <p>1 A. I believe it was the last week of August 2 of 2004.</p> <p>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?</p> <p>6 A. Yes.</p> <p>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?</p> <p>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.</p> <p>14 Q. I'm sorry, what does that have to do with 15 the computer?</p> <p>16 A. He would like to work in the cabana so I 17 would pay attention to that.</p> <p>18 Q. So he would go to the computer in the 19 cabana and you would make sure that the cabana was 20 clean?</p> <p>21 A. Yes, sir.</p> <p>22 Q. So he had coffee at 6:30 a.m. Did he 23 start working immediately after that?</p> <p>24 A. Yes.</p> <p>25 Q. Continue. What did you do then?</p>	<p style="text-align: right;">Page 21</p> <p>1 A. Jerome. Jerome Pierre was the gardener.</p> <p>2 Q. And he was full-time?</p> <p>3 A. Full-time, yes.</p> <p>4 Q. Who else?</p> <p>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.</p> <p>12 Q. Because there was problems with the air 13 conditioner?</p> <p>14 A. Well, the house is big, and all the house 15 in Palm Beach need constant attention.</p> <p>16 Q. Okay.</p> <p>17 A. That's the full -- and the chef, David, I 18 can't remember his last name.</p> <p>19 Q. Was it Mullen?</p> <p>20 A. I don't recall, sir, right now.</p> <p>21 Q. Muller. But his first name was David?</p> <p>22 A. David, yes.</p> <p>23 Q. Was there a butler as well?</p> <p>24 A. Well, I used to double as household 25 manager slash butler.</p>

<p>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.</p>	<p>Page 22</p> <p>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</p>
<p>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</p>	<p>Page 23</p> <p>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</p>

<p>1 with a copy.</p> <p>2 Q. Were you the only one who was allowed to</p> <p>3 answer the phone?</p> <p>4 A. Yes.</p> <p>5 Q. I'm sorry, what would you do --</p> <p>6 A. I would leave it on the counter next to</p> <p>7 the kitchen so when I find that piece all crumbled</p> <p>8 I knew that Mr. Epstein saw the message, so we</p> <p>9 communicated like that.</p> <p>10 Q. Now, you mentioned Mr. Epstein would give</p> <p>11 you instructions during the course of the day.</p> <p>12 A. Through his assistant.</p> <p>13 Q. And his assistant was whom?</p> <p>14 A. Sarah Kellen.</p> <p>15 Q. But you didn't view her as your</p> <p>16 supervisor?</p> <p>17 A. She take orders from Mrs. Maxwell but she</p> <p>18 will tell me, Alfredo, we need to buy this, we</p> <p>19 need to do this, and so and so was coming. I</p> <p>20 couldn't talk directly to Mr. Epstein.</p> <p>21 Q. Okay. So any communications from Mr.</p> <p>22 Epstein always came through Ms. Kellen?</p> <p>23 A. Or from the office in New York. Lesley,</p> <p>24 his secretary, or somebody else, the comptroller,</p> <p>25 the architect, any lawyer.</p>	<p>Page 26</p> <p>1 A. Yes. Sometimes very short notice but,</p> <p>2 yes, I was.</p> <p>3 Q. So that varied?</p> <p>4 A. Yes.</p> <p>5 Q. Who would give you that notice?</p> <p>6 A. Mrs. Maxwell or Sarah or Larry, the</p> <p>7 pilot.</p> <p>8 Q. And then you would drive to pick them up</p> <p>9 at the airport?</p> <p>10 A. Yes.</p> <p>11 Q. And who traveled with him?</p> <p>12 A. The three pilots and some guests.</p> <p>13 Q. What do you mean by guests?</p> <p>14 A. He will have some friends from Harvard,</p> <p>15 he will have -- well, very important people that,</p> <p>16 you know, friends, acquaintances from New York or</p> <p>17 Europe because I was just told the number of</p> <p>18 people was coming on the plane.</p> <p>19 Q. Were there people who were employed by</p> <p>20 him who came regularly?</p> <p>21 A. Yes.</p> <p>22 Q. And who would they be?</p> <p>23 A. Like I said, they were the pilots, Larry</p> <p>24 Bisosky, George, and I don't remember the flight</p> <p>25 engineer, and he will have two girlfriends.</p>
<p>Page 27</p> <p>1 Q. Lawyer, what kind of instructions would</p> <p>2 you get from lawyers?</p> <p>3 A. We used to have a lot of time, for</p> <p>4 instance, the dock construction, you need to have</p> <p>5 a lot of permits in Palm Beach so they were there</p> <p>6 for that reason.</p> <p>7 Q. Okay. Now, so you would interact with</p> <p>8 the staff from New York and that would include I</p> <p>9 think you said Lesley?</p> <p>10 A. Lesley, Bella.</p> <p>11 Q. What was Lesley's position?</p> <p>12 A. Lesley is the secretary, secretary to Mr.</p> <p>13 Epstein.</p> <p>14 Q. Okay. Is that Lesley Groff?</p> <p>15 A. I believe it was, I don't remember the</p> <p>16 last name.</p> <p>17 Q. Bella, who was Bella?</p> <p>18 A. Bella was the assistant comptroller.</p> <p>19 Q. Anyone else that you dealt with in New</p> <p>20 York?</p> <p>21 A. Doug Shadow was the architect and he used</p> <p>22 to come to the house in a regular basis because we</p> <p>23 used to have a lot of projects going on.</p> <p>24 Q. Okay. Would you get advance notice when</p> <p>25 Mr. Epstein was going to arrive in Palm Beach?</p>	<p>Page 28</p> <p>1 Q. The pilot would have two girlfriends?</p> <p>2 A. Mr. Epstein. This is all people coming</p> <p>3 in the plane together.</p> <p>4 Q. Right. What do you mean by girlfriends?</p> <p>5 A. Friends, you know, that he was always</p> <p>6 having friends that he will befriend in New York,</p> <p>7 I don't know, or some other places.</p> <p>8 But I was just told -- my concern was how</p> <p>9 many people I have to feed, how many cars do I</p> <p>10 need to transport these people from the airport to</p> <p>11 the house, and to arrange accommodations in the</p> <p>12 house.</p> <p>13 Q. What about Sarah Kellen, did she travel</p> <p>14 with him?</p> <p>15 A. Yes.</p> <p>16 Q. So she was on the plane?</p> <p>17 A. Yes.</p> <p>18 MR. CRITTON: Form.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. And Ms. Maxwell?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: No, she will have different</p> <p>23 plane.</p> <p>24 BY MR. MERMELSTEIN:</p> <p>25 Q. Okay.</p>

<p>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.</p>	<p>Page 30</p> <p>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?</p>
<p>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</p>	<p>Page 31</p> <p>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</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>Page 34</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>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>Page 35</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.  2 Q. Would he get one a day or more than one a  3 day?  4 A. Sometimes there were two.  5 Q. Were there times when they were more than  6 that?  7 A. No, I don't think so.  8 Q. And the routine was always the same, they  9 come to the door, you would let them in and bring  10 them to the kitchen?  11 A. Yes, sir.  12 Q. And then Ms. Kellen would greet them?  13 A. Yes.  14 Q. And you always walked out?  15 A. Yes, I would go to the staff house or I  16 will be on my phone, you know.  17 Q. Is the staff house a separate house?  18 A. Yes.  19 Q. You didn't live on the premises; did you?  20 A. Yes, I did.  21 Q. You lived on the premises. And so who on  22 the staff lives on the premises?  23 A. I was the only one.  24 Q. Were there days you had off?  25 A. Yes. When Mr. Epstein will leave we'll</p>	<p>1 drink and I will leave them.  2 Q. Do you remember any of them telling you  3 anything personal about themselves?  4 A. No.  5 Q. These were -- were these sometimes men,  6 sometimes women?  7 A. Women.  8 Q. They were always women?  9 A. Yes.  10 Q. Did you know how old these women were?  11 A. No, sir.  12 Q. You mentioned before you had -- because  13 you have a daughter. Correct? How old is your  14 daughter?  15 A. 20.  16 Q. So you have a sense as to, you know --  17 A. They were 20 something, you know.  18 Q. You think they were 20 something, these  19 girls who came over?  20 A. (Shakes head.)  21 MR. CRITTON: You need to answer out  22 loud. Yes, no?  23 BY MR. MERMELSTEIN:  24 Q. You need to answer out loud, you shook  25 your head.</p>
<p style="text-align: right;">Page 39</p> <p>1 clean the house and he will tell me, Alfredo, take  2 the Mercedes go to Miami for the weekend or four  3 days.  4 Q. But that would be when he wasn't there?  5 A. Exactly.  6 Q. But when he was there you would always be  7 living there in the staff house?  8 A. Yes.  9 Q. Where was the staff house in conjunction  10 with the main house?  11 A. It's adjacent right next to each other.  12 Q. So you could enter the main house without  13 going outside from the staff house?  14 A. Yes.  15 Q. Okay. So you don't ever recall being  16 there at the time that Sarah Kellen would greet  17 this person in the kitchen, the masseuse?  18 A. I was there sometimes, yes, we meet but  19 she will take over that and I would leave the  20 house.  21 Q. On those occasions while you were waiting  22 for Sarah Kellen would you ever have a  23 conversation with the masseuse?  24 A. Not really. I was busy to do a lot of  25 things, I will be sure that they have something to</p>	<p>1 A. I'm sorry. I think they were 20 years  2 old.  3 Q. And what do you base that on?  4 A. They were very tall to begin with, the  5 way they talk, some they told me about college,  6 something you learn past high school.  7 Q. Some would tell you about college?  8 A. Yes.  9 Q. So you did have personal discussions with  10 some of them?  11 A. While I was driving with them they would  12 tell me they were from Minnesota, for instance,  13 they will tell me I want to go to this college or  14 Miami this college.  15 Q. So on what occasions would you have to  16 drive with them?  17 A. Almost on daily basis because I was doing  18 most of the driving for them to go shopping or  19 pick them up.  20 Q. Okay. Now I'm a little confused. Are we  21 talking about the girls who came with Mr. Epstein?  22 A. Yes.  23 Q. On the plane?  24 A. Yes.  25 Q. No, I'm talking about the masseuses.</p>

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

<p>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</p>	<p>Page 46</p> <p>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:</p>
<p>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.</p>	<p>Page 47</p> <p>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.</p>

<p>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.</p>	<p>Page 50</p> <p>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:</p>
<p>Page 51</p> <p>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.?</p>	<p>Page 51</p> <p>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.</p>

<p>1 Q. Okay. And you would cleanup?</p> <p>2 A. Yes.</p> <p>3 Q. Again, why did the sheets need to be</p> <p>4 replaced at that particular point in time?</p> <p>5 A. Because they were in disarray so we need</p> <p>6 to straighten the bed, the sheets, towels need to</p> <p>7 be replaced.</p> <p>8 Q. But the bed was made after Mr. Epstein</p> <p>9 woke up?</p> <p>10 A. Yes, it was.</p> <p>11 MR. CRITTON: Form.</p> <p>12 BY MR. MERMELSTEIN:</p> <p>13 Q. Correct?</p> <p>14 A. If he will leave the house we'll do the</p> <p>15 bed.</p> <p>16 Q. I see what you're saying. If he didn't</p> <p>17 leave the house until the afternoon when he went</p> <p>18 to the movies then the bed wouldn't be made?</p> <p>19 A. Exactly.</p> <p>20 Q. What else did you do when you went</p> <p>21 upstairs?</p> <p>22 A. We need to take a look around, the</p> <p>23 temperature of the A/C. Mostly laundry, sir, you</p> <p>24 know, because we used to go through a lot of</p> <p>25 laundry, that's all.</p>	<p>Page 54</p> <p>1 Q. The back massager vibrated?</p> <p>2 A. Yes.</p> <p>3 Q. I started this questioning by asking you</p> <p>4 about sex toys. Correct?</p> <p>5 A. Yes. Go ahead.</p> <p>6 Q. What were the sex toys?</p> <p>7 A. In the armoire.</p> <p>8 Q. Yes. Okay.</p> <p>9 A. I never see them outside laying around.</p> <p>10 Q. You never saw them out of the armoire?</p> <p>11 A. I don't think so, sir.</p> <p>12 Q. Do you remember what kind of sex toys</p> <p>13 they were?</p> <p>14 A. Like spouses, you know, what do you call</p> <p>15 that? Handcuffs, or a vibrator. They called</p> <p>16 dildos?</p> <p>17 Q. Yes. Were there many of them?</p> <p>18 MR. CRITTON: Form.</p> <p>19 THE WITNESS: A few.</p> <p>20 BY MR. MERMELSTEIN:</p> <p>21 Q. Describe them.</p> <p>22 A. You know, personal vibrators for women.</p> <p>23 Q. Were they a particular color, a</p> <p>24 particular size?</p> <p>25 A. I don't remember, sir.</p>
<p>1 Q. Did Mr. -- strike that.</p> <p>2 Were there sex toys anywhere in the</p> <p>3 master bedroom?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: Yes, they were in the</p> <p>6 master bedroom.</p> <p>7 BY MR. MERMELSTEIN:</p> <p>8 Q. Okay. Where were they?</p> <p>9 A. In the armoire in front of Mr. Epstein's</p> <p>10 bed.</p> <p>11 Q. In front of his bed?</p> <p>12 A. Yes.</p> <p>13 Q. Did you ever do anything with the sex</p> <p>14 toys?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: The things I did I cleaned</p> <p>17 the back -- there is a vibrator to keep</p> <p>18 massage to your back. We used to wipe them,</p> <p>19 put them away, massage creams, put them</p> <p>20 away, fold the table, folding the massage</p> <p>21 table.</p> <p>22 BY MR. MERMELSTEIN:</p> <p>23 Q. Okay. You mentioned there was a back</p> <p>24 massager?</p> <p>25 A. Yes.</p>	<p>Page 55</p> <p>1 Q. You remember he had a few vibrators?</p> <p>2 A. Yes.</p> <p>3 Q. Any other kind of toys that you can</p> <p>4 remember?</p> <p>5 A. No, sir.</p> <p>6 Q. And it's your testimony here today that</p> <p>7 they were always on the shelf?</p> <p>8 A. Yes.</p> <p>9 Q. You never had to do anything with them?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: Not me personal, sir, I</p> <p>12 don't know if Louella saw them, but this is</p> <p>13 what I did and when we went upstairs.</p> <p>14 BY MR. MERMELSTEIN:</p> <p>15 Q. Do you recall telling the police that</p> <p>16 when you cleaned Mr. Epstein's bedroom after the</p> <p>17 massages you would discover a massager, vibrators,</p> <p>18 and sex toys scattered on the floor?</p> <p>19 MR. CRITTON: Form.</p> <p>20 THE WITNESS: Yeah, what I did was the</p> <p>21 back massager, the back rubber, this was</p> <p>22 always on the floor.</p> <p>23 BY MR. MERMELSTEIN:</p> <p>24 Q. Okay. But it says sex toys.</p> <p>25 MR. CRITTON: Form.</p>

<p>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 </p>	<p>Page 58</p> <p>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. </p>
<p>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. </p>	<p>Page 59</p> <p>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. </p>

<p>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</p>	<p>Page 62 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.</p>
<p>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.</p>	<p>Page 63 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.</p>

<p style="text-align: right;">Page 66</p> <p>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.</p>	<p style="text-align: right;">Page 68</p> <p>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?</p>
<p style="text-align: right;">Page 67</p> <p>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</p>	<p style="text-align: right;">Page 69</p> <p>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</p>

<p>1 in cash as opposed to check?  2 MR. CRITTON: Form.  3 THE WITNESS: I was told to pay them  4 cash, sir.  5 BY MR. MERMELSTEIN:  6 Q. Simply you were told and didn't ask why?  7 A. No.  8 Q. Do you recall telling the detective who  9 interviewed you for the police that you thought of  10 yourself as a human ATM machine?  11 MR. CRITTON: Form.  12 THE WITNESS: Yes.  13 BY MR. MERMELSTEIN:  14 Q. You recall saying that?  15 MR. CRITTON: Form.  16 THE WITNESS: Because I always had cash  17 in my pocket.  18 BY MR. MERMELSTEIN:  19 Q. And why was there always cash in your  20 pocket?  21 A. That was part of my job to have, you  22 know, for emergencies or paying somebody cash.  23 Q. Okay. What kind of emergencies?  24 A. It's hard to say. I was supposed to put  25 cash on each Mercedes Benz on each ashtray. The</p>	<p>Page 70</p> <p>1 A. Not him. I will drive anybody else but  2 he would rather eat at home.  3 Q. So you would drive house guests to  4 restaurants?  5 A. Yes.  6 Q. And when you did that you would -- didn't  7 you stay with the car or did you eat with them?  8 A. No, I will stay with the car.  9 Q. So who did you tip?  10 A. If you want to park in front of the  11 restaurant you got to tip the valet otherwise  12 you're taking one of the spots.  13 Sometimes I used to take -- I'm sorry.  14 Aviation, you know, you need to go to aviation and  15 help those guys move your cars around, you need --  16 they carry luggage, so I used to tip those too.  17 Q. That would be when you picked up or  18 dropped off Mr. Epstein. Correct?  19 A. Yes.  20 MR. MERMELSTEIN: We'll mark this as an  21 exhibit, composite exhibit.  22 (Composite Exhibit 1 was marked for  23 Identification.)  24 MR. CRITTON: Just out of curiosity, on  25 depositions are we going to use instead of</p>
<p>1 idea behind this is you get stranded nobody accept  2 credit card or check you have cash.  3 Q. How much did you leave in the ashtray?  4 A. 300.  5 Q. And did you ever have to replenish that  6 money?  7 A. Yes.  8 Q. Because the Mercedes was stranded?  9 A. No, because when Mr. Epstein will leave I  10 have to collect that money because I will send the  11 cars to the car wash so to avoid that money being  12 stolen we used to keep track, you know, when to  13 retrieve that money and then when he's coming put  14 it back there again.  15 Q. So you use cash for that purpose and you  16 also use cash to pay the masseuses. Correct?  17 A. Yes.  18 Q. Did you use cash for any other purpose?  19 A. Car wash for the guy who used to come to  20 the house and wash all the cars. Tipping  21 sometimes for getting a good spot in the  22 restaurant you have to have cash, something like  23 that.  24 Q. Okay. Would you drive Mr. Epstein to a  25 restaurant?</p>	<p>Page 71</p> <p>1 doing plaintiff and defendant designations  2 do you just want to run them one, two,  3 three, four?  4 MR. MERMELSTEIN: That's fine with me as  5 long as we remember where we left off.  6 MR. CRITTON: Well, are we going to do it  7 consecutive with all of the depositions?  8 I'm okay with that if someone can keep track  9 of that.  10 MR. EDWARDS: I've had that go wrong  11 before, especially when we have some parties  12 who aren't here, such as Mr. Garcia, he's  13 going to join depositions, we have to start  14 at 27 or whatever.  15 MR. CRITTON: For each deposition one  16 through whatever without necessarily giving  17 them a plaintiff or defendant.  18 BY MR. MERMELSTEIN:  19 Q. Mr. Rodriguez, I've marked as Exhibit 1 a  20 composite document which includes four per page of  21 what appear to be message slips.  22 First of all let me ask you, let me  23 direct your attention to the first page of this  24 exhibit. And the upper left message has initials  25 at the bottom. Is that correct?</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>	Page 74	<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>	Page 76
<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>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>	Page 75	Page 77

<p style="text-align: right;">Page 78</p> <p>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.</p>	<p style="text-align: right;">Page 80</p> <p>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</p>
<p style="text-align: right;">Page 79</p> <p>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?</p>	<p style="text-align: right;">Page 81</p> <p>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?</p>

<p>1 A. Something like that, sir.</p> <p>2 Q. Did you have an understanding as to what</p> <p>3 she meant?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. MERMELSTEIN:</p> <p>7 Q. What was that?</p> <p>8 MR. CRITTON: Form.</p> <p>9 THE WITNESS: That she had a female.</p> <p>10 It's self-explanatory.</p> <p>11 BY MR. MERMELSTEIN:</p> <p>12 Q. Female for what?</p> <p>13 A. I don't know, sir. Maybe a massage,</p> <p>14 maybe to go out as his companion.</p> <p>15 MR. CRITTON: Form, and move to strike</p> <p>16 the answer as speculation.</p> <p>17 BY MR. MERMELSTEIN:</p> <p>18 Q. And the 561 area code is Palm Beach.</p> <p>19 Correct?</p> <p>20 A. Yes.</p> <p>21 Q. Was C. there often to your recollection?</p> <p>22 A. I don't think so, sir.</p> <p>23 Q. You don't remember her coming over to the</p> <p>24 house?</p> <p>25 A. No, not in the house.</p>	<p>Page 82</p> <p>1 A. No.</p> <p>2 Q. Let me direct your attention to page 13.</p> <p>3 MR. CRITTON: When you reference a page</p> <p>4 you may want to tell him what the message is</p> <p>5 and the date, if he's got it, that's fine.</p> <p>6 MR. EDWARDS: It needs to be cleaner on</p> <p>7 the record anyway.</p> <p>8 BY MR. MERMELSTEIN:</p> <p>9 Q. There is a message on the upper left</p> <p>10 dated November 20, 2004.</p> <p>11 A. Yes.</p> <p>12 Q. That's a message that you took. Correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Ms. B. Do you recall who that is?</p> <p>15 A. No, sir.</p> <p>16 Q. You have no recollection?</p> <p>17 A. No.</p> <p>18 Q. That was the message you took for Sarah?</p> <p>19 A. Yes.</p> <p>20 Q. It was your understanding that Sarah made</p> <p>21 the appointments for the massages?</p> <p>22 A. Yes.</p> <p>23 MR. CRITTON: Form.</p> <p>24 BY MR. MERMELSTEIN:</p> <p>25 Q. Let me direct your attention to a message</p>
<p>1 Q. Let me direct you to page 11, two pages</p> <p>2 in.</p> <p>3 A. Where do you see the page number?</p> <p>4 Q. Just go down two pages. I'm just</p> <p>5 counting in my head.</p> <p>6 Now, other than the message on the upper</p> <p>7 left, that's your signature at the bottom.</p> <p>8 Correct?</p> <p>9 A. Yes.</p> <p>10 Q. Did you take these other messages?</p> <p>11 A. No.</p> <p>12 Q. Now, was there a different system or</p> <p>13 protocol at night?</p> <p>14 A. No, it's the same.</p> <p>15 Q. So if you were in the staff house would</p> <p>16 the phone ring in there and you would pick it up</p> <p>17 in there?</p> <p>18 A. Yes, I will take the information and</p> <p>19 transfer to this, this was in the main house.</p> <p>20 Q. Okay. But the phone would ring in the</p> <p>21 staff house?</p> <p>22 A. Yes.</p> <p>23 Q. So as we sit here today you have no</p> <p>24 explanation as to why someone else is writing down</p> <p>25 messages on this pad?</p>	<p>Page 83</p> <p>1 dated 12/4/04.</p> <p>2 MR. CRITTON: Page 15.</p> <p>3 BY MR. MERMELSTEIN:</p> <p>4 Q. On the bottom right that's your</p> <p>5 signature. Correct?</p> <p>6 A. Yes.</p> <p>7 Q. And Johanna is the name?</p> <p>8 A. Yes.</p> <p>9 Q. And is that the same Johanna you</p> <p>10 testified to earlier was the one you remember?</p> <p>11 A. Yes, I believe so, sir.</p> <p>12 Q. Can you describe Johanna for us?</p> <p>13 A. Johanna, she was -- I remember she was</p> <p>14 pregnant at the time, so very sweet lady, she live</p> <p>15 in West Palm Beach, always talkative.</p> <p>16 Q. What kind of things did you talk about?</p> <p>17 A. How are you doing and everything, but</p> <p>18 cheerful person, you know, nothing specific, but</p> <p>19 she will always greet me cheerfully, nice person</p> <p>20 to be around.</p> <p>21 Q. Did she go to school, did she have</p> <p>22 another job?</p> <p>23 A. I think she was a professional masseuse.</p> <p>24 Q. Now, it was your understanding that</p> <p>25 generally the girls who came to the house for</p>

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

<p>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.</p>	<p>Page 90</p> <p>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.</p>
<p>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</p>	<p>Page 91</p> <p>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?</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>Page 94</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>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>Page 95</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>

25 (Pages 94 to 97)

<p>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.</p>	<p>Page 98</p> <p>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.</p>
<p>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.</p>	<p>Page 99</p> <p>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:</p>

<p>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:</p>	<p>Page 102  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.</p>
<p>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</p>	<p>Page 103  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.</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 point?</p> <p>6 A. Yes.</p> <p>7 Q. What did you give to him?</p> <p>8 A. I'm sorry?</p> <p>9 Q. What did you give to him? What did you hand him?</p> <p>10 A. A list of -- let me -- it was a list of -- it was like a yellow, what you call it, pad like that, my own writings of contractors, people who used to go there and phones.</p> <p>11 And I don't remember exactly what I give him but, you know, I have it with me and say can I have them and say can I borrow them and to this day I gave it to Detective Joe something.</p> <p>12 Q. Was it Detective Recarey?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Was this a journal of some kind that you maintained?</p> <p>15 A. Not necessarily, no. It was just my own notes and I had it with me so he asked me can I</p>	<p>Page 106</p> <p>1 among them contractors. And because this is five years ago, you know, I don't exactly remember that.</p> <p>2 Q. Okay. Did you include in this list of people who came into the house the girls who had come to give massages?</p> <p>3 A. Probably there were some names there, sir.</p> <p>4 Q. Why were there only some names?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: Because it was an informal list, you know, it was not like A to Z thing, I just write it down sometimes.</p> <p>7 BY MR. MERMELSTEIN:</p> <p>8 Q. Did Sarah Kellen or Mr. Epstein or Ms. Maxwell instruct you to maintain a list of the people who came into the house?</p> <p>9 A. No, I do this, this is my job, you know. I do this in another place I used to work to have those telephone numbers handy because it's basically day to day, you know, you want to have some reference.</p> <p>10 Q. Okay. So this list included a person's name?</p> <p>11 A. Yes.</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 District Attorney and I had some notes and so I had it with me.</p> <p>6 Q. So you brought the notes with you to the interview?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And when you were there you were interviewed -- and this is the interview you mentioned was tape recorded?</p> <p>9 A. Yes.</p> <p>10 Q. And when you arrived for the interview during the course of the interview did Mr. Recarey ask you to hand over these papers?</p> <p>11 A. He saw me going through my papers and said can I have those.</p> <p>12 Q. And you handed it to him right there?</p> <p>13 A. You know, I was -- yes.</p> <p>14 Q. Okay. And describe again what was on these papers.</p> <p>15 A. As far as I remember they were my personal notes of people coming to the house,</p>	<p>Page 107</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 was like a legal pad?</p> <p>6 A. Yes. I put it in the file probably, there were four or five pages.</p> <p>7 Q. Was it single spaced, you had a name and a phone number on each line?</p> <p>8 A. Yeah, they were single spaced.</p> <p>9 Q. Did you write anything about who that person was, what their relationship to Mr. Epstein was?</p> <p>10 A. No.</p> <p>11 Q. Just a name and a phone number?</p> <p>12 A. A name and phone number and sometimes dates.</p> <p>13 Q. What were the dates for?</p> <p>14 A. It was for me to know that this person was in the house a week ago.</p> <p>15 Q. Okay. So it indicated when they were there?</p> <p>16 A. These people were familiar because I was 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  2 have some kind of reference to yourself because  3 you have too many information in your head, so it  4 was like a cross reference for me that these  5 people were in the house before so I used to jot  6 around telephone numbers and names.</p> <p>7 Q. And this was a reference you kept for  8 yourself?</p> <p>9 A. Yes, it was personal.</p> <p>10 Q. Okay. And that way if you were ever  11 asked by Mr. Epstein or Ms. Kellen or Ms. Maxwell  12 about someone who had come into the house you  13 would have it on your pad?</p> <p>14 A. Yes.</p> <p>15 Q. Were there entries there for each day  16 that people came?</p> <p>17 A. No, not necessarily.</p> <p>18 Q. People come to the house every day.  19 Right?</p> <p>20 A. Yes.</p> <p>21 Q. And on some occasions it was the first  22 time they were there. Correct?</p> <p>23 A. Yes.</p> <p>24 Q. And you would write down their name and  25 phone number?</p>	<p style="text-align: right;">Page 112</p> <p>1 information on this pad? If someone came to the  2 front door you would escort them to the kitchen.  3 Correct? What point would you get their name and  4 phone number?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: At the end of each day I  7 will have to prepare stuff for the next day  8 so I will always make this is what happened  9 today because sometimes it's very hectic so  10 I make notes for tomorrow, this is what  11 we're going to do, so I used to for my own  12 information give these numbers and names,  13 like I said, they were not only masseuses  14 they were, you know, names of contractors  15 that need to get back in the house. Notes  16 for myself that was basically instead of  17 having a personal computer I used to have  18 that.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. When you came to the front door to let  21 someone in you had to enter the code on the wall.  22 Correct?</p> <p>23 A. Yes.</p> <p>24 Q. Did you have in your hand something to  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  5 who came for massages. Correct?</p> <p>6 A. Yes.</p> <p>7 Q. And wouldn't the list have been longer  8 than four or five pages if it recorded all this  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  12 be honest with you. He probably have it in  13 his possession but --</p> <p>14 BY MR. MERMELSTEIN:</p> <p>15 Q. Okay. So it could have been longer than  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  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  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  7 keep these in my office.</p> <p>8 Q. Okay. Well, I'm trying to -- obviously,  9 someone who walked into the house you escorted  10 them into the kitchen. Correct?</p> <p>11 A. Yes.</p> <p>12 Q. You didn't memorize their name and phone  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  16 would go and write it down?</p> <p>17 A. No, no, no. I would escort this lady or  18 this person into the house, go to my staff house  19 in my office and write it down.</p> <p>20 Q. Okay. But you wouldn't write down her  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  24 when you got to the staff house?</p> <p>25 A. I would get it from this.</p>

<p>1 Q. You would get it from the message pad?</p> <p>2 A. Yeah. Then I will match the name with</p> <p>3 the number as a source of information for me</p> <p>4 because if somebody walks into the house and says,</p> <p>5 I'm Maria, how you going to know really -- it was</p> <p>6 a source of -- it was a tool for making my job</p> <p>7 easier.</p> <p>8 Q. Okay. So if someone walks in the house</p> <p>9 and says they're Maria, then you could always</p> <p>10 cross reference them with a message?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. It would always be a message</p> <p>13 indicating their name and phone number on it?</p> <p>14 A. Yes.</p> <p>15 MR. CRITTON: Form.</p> <p>16 BY MR. MERMELSTEIN:</p> <p>17 Q. And then you would take that and put it</p> <p>18 on your pad?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. So if I understand the</p> <p>21 progression, you would -- the person would come to</p> <p>22 the door, you would escort them into the kitchen,</p> <p>23 they would say I'm Maria, you would then at some</p> <p>24 point during the day you would go to your message</p> <p>25 pad that we looked at was Exhibit 1, you would see</p>	<p>Page 114</p> <p>1 must have been cut off by the lightning</p> <p>2 strike, I'm not aware of Exhibit 2.</p> <p>3 MR. MERMELSTEIN: It's just a compilation</p> <p>4 of papers that I've handed him.</p> <p>5 MR. WILLITS: Okay.</p> <p>6 MR. CRITTON: The question is did he give</p> <p>7 any of the documents in Exhibit 2 to</p> <p>8 Detective Recarey?</p> <p>9 MR. MERMELSTEIN: Yes.</p> <p>10 THE WITNESS: I believe there were these</p> <p>11 notes.</p> <p>12 BY MR. MERMELSTEIN:</p> <p>13 Q. Okay. I got to go through this exercise</p> <p>14 because it was helpful on Exhibit 1, but I'm going</p> <p>15 to number the pages.</p> <p>16 MR. CRITTON: You got twelve pages. Is</p> <p>17 that right?</p> <p>18 MR. MERMELSTEIN: Yes.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. Okay. You started to say that you did</p> <p>21 turn over certain of the pages in this Exhibit 2</p> <p>22 to Mr. Recarey and you're referencing page five?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And what about page six?</p> <p>25 A. Yes.</p>
<p>1 there was a message with the name Maria and her</p> <p>2 phone number and then you would write it down on</p> <p>3 your yellow pad?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Did I misstate anything there in</p> <p>6 terms of how it went?</p> <p>7 A. No.</p> <p>8 Q. Okay. You didn't keep a copy of this</p> <p>9 when you gave it to Detective Recarey?</p> <p>10 A. No.</p> <p>11 Q. Were there any other papers or documents</p> <p>12 that you gave to Detective Recarey?</p> <p>13 A. There was some other stuff but I don't</p> <p>14 remember exactly, you know, they were notes that I</p> <p>15 have. Nothing I don't think fan notes or anything</p> <p>16 of that.</p> <p>17 MR. MERMELSTEIN: Let me mark this as the</p> <p>18 next Exhibit 2.</p> <p>19 (Exhibit 2 was marked for</p> <p>20 Identification.)</p> <p>21 BY MR. MERMELSTEIN:</p> <p>22 Q. Take a look through Exhibit 2 and let me</p> <p>23 know if there is any papers or documents in here</p> <p>24 that you gave to Detective Recarey.</p> <p>25 MR. WILLITS: This is Richard Willits. I</p>	<p>Page 115</p> <p>1 Q. Any other pages in this exhibit?</p> <p>2 A. No.</p> <p>3 Q. Okay. Do you recall giving him anything</p> <p>4 other than these two pages out of your note pad?</p> <p>5 A. I don't remember, sir.</p> <p>6 Q. Let's look at what's on pages five and</p> <p>7 six. What's this referring to? Is that your</p> <p>8 handwriting? I'm sorry, strike the first</p> <p>9 question.</p> <p>10 Is this your handwriting on page five?</p> <p>11 A. At the bottom is.</p> <p>12 Q. The reference to Dollar Rent a Car?</p> <p>13 A. Yes.</p> <p>14 Q. That's your handwriting?</p> <p>15 A. Yes.</p> <p>16 Q. The handwriting on top is not yours?</p> <p>17 A. No.</p> <p>18 Q. What's the reference to Dollar Rent a</p> <p>19 Car, what's that there?</p> <p>20 A. I rent a car for -- for one of the girls,</p> <p>21 and the rental car was only because when you go</p> <p>22 over a month you have to go into a lease contract</p> <p>23 so the Dollar Rent a Car Company contact me to</p> <p>24 renew that and I can have the car for another</p> <p>25 month.</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>Page 118</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>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>Page 119</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 2 check. Correct? 3 A. Yes. 4 Q. And then there is another page three of 5 the check dated December 8, 2004. Correct? 6 A. Yes. 7 Q. And that's also a thousand dollars? 8 A. Yes. 9 Q. And one of the uses of this cash would be 10 to pay the girls who came to give massages. 11 Correct? 12 MR. CRITTON: Form. 13 THE WITNESS: Yes. 14 BY MR. MERMELSTEIN: 15 Q. That's your endorsement on page four of 16 this exhibit. Correct? 17 A. Yes. 18 Q. Exhibit 2? 19 A. Yes. 20 Q. The page 7 through 11 appear to be 21 statement history or statement list. Do you see 22 that? 23 A. Yes. 24 MR. CRITTON: Form. 25 BY MR. MERMELSTEIN:</p>	<p style="text-align: right;">Page 124</p> <p>1 MR. CRITTON: Form. 2 THE WITNESS: Probably it came from 3 another account, sir, but I don't know. 4 BY MR. MERMELSTEIN: 5 Q. I'm sorry, a what? 6 A. Another account, but the amount why is 7 that odd, I don't know. 8 Q. You don't recall the reason for that 9 particular amount? 10 A. No. 11 Q. And the next, 9,747.32, you don't recall? 12 A. No. 13 Q. Okay. Was there like a minimum which 14 would trigger you to say I need more money in that 15 account? 16 A. Below 2,000, yes, I would have to call 17 for more money. 18 Q. Below 2,000 was the rule. Correct? 19 A. Yes, more or less, sir. 20 Q. Okay. Just look at the last page of the 21 exhibit. Again, is that your handwriting? 22 A. Yes. 23 Q. On the upper left where it says check 24 written by Alfredo Rodriguez -- 25 A. Yes.</p>
<p style="text-align: right;">Page 123</p> <p>1 Q. And this is for the account that -- 2 A. Household account. 3 Q. That's for the household account? 4 A. Uh-huh. 5 Q. Do you recall why this was printed out 6 or -- 7 MR. CRITTON: Form. 8 THE WITNESS: I don't remember, sir. 9 BY MR. MERMELSTEIN: 10 Q. I notice there are some incoming wires 11 indicated on this dated December 6th and 12 December 15th. I take it the account was funded 13 through the incoming wires. Correct? 14 A. Yes. 15 Q. Would there be communication that more 16 money is needed in the account, how would that 17 work? 18 A. I would call Bella in New York and she 19 would put money into that account. 20 Q. Okay. Did you say how much you needed or 21 you just said you need more money? 22 A. I will say the amount and she put in the 23 money. 24 Q. Okay. It seems to be an odd amount 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? 2 A. Last check written by. 3 Q. Alfredo Rodriguez. I take it this is the 4 last check written while you were employed? 5 A. Something like that, yes. 6 Q. Okay. But that's your handwriting? 7 A. Yes, it is. 8 Q. And this was a payroll check. Is that 9 correct? 10 A. Yes. 11 Q. For Jerome Pierre? 12 A. You know, why I wrote this is because he 13 went until he became under the New York office 14 jurisdiction so I didn't pay him after that. 15 Q. So he went to New York? 16 A. Yes. 17 Q. And worked for Mr. Epstein? 18 A. No, no, he work here but his check came 19 from New York. 20 Q. Okay. Now, was it shortly after this 21 that you left the employ of Mr. Epstein? 22 A. I left at the end of February. 23 Q. Why did you leave? 24 A. The reason I was let go because they told 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>

<p>1 the month.</p> <p>2 Q. Now, why would your wife know?</p> <p>3 A. Because they knock on my door and, you</p> <p>4 know, say well we are the head of security Mr.</p> <p>5 Epstein, and my wife knew where I work and</p> <p>6 everything and so she called me.</p> <p>7 Q. Where were you working at the time?</p> <p>8 A. I had my own restaurant in Miami.</p> <p>9 Q. What was the name of your restaurant?</p> <p>10 A. El Cristol.</p> <p>11 Q. El Cristol?</p> <p>12 A. Yes.</p> <p>13 Q. That's with a C?</p> <p>14 A. E-L C-R-I-S-T-O-L.</p> <p>15 Q. Okay. And you own the restaurant?</p> <p>16 A. No, I sold it.</p> <p>17 Q. But at the time you owned it?</p> <p>18 A. Yes, my wife and I.</p> <p>19 Q. So these two people knock on your door</p> <p>20 when your wife is there. Correct?</p> <p>21 A. Yes.</p> <p>22 Q. And they say they're head of security for</p> <p>23 Mr. Epstein. Correct?</p> <p>24 A. Yes.</p> <p>25 Q. And do you know what their names were?</p>	<p>Page 130</p> <p>1 Q. And what do you recall telling them?</p> <p>2 A. I told them that my job duties, the</p> <p>3 hours, if I remember any names, where did I go.</p> <p>4 Q. Was this before or after you spoke to</p> <p>5 Detective Recarey?</p> <p>6 A. Before.</p> <p>7 Q. About how long before?</p> <p>8 A. Three months before.</p> <p>9 Q. And for your interview with Detective</p> <p>10 Recarey you were subpoenaed. Is that correct?</p> <p>11 A. Yes.</p> <p>12 Q. Had you spoken to Detective Recarey or</p> <p>13 anyone from the Palm Beach Police before that</p> <p>14 time?</p> <p>15 A. No, he went to my house.</p> <p>16 Q. Did these investigators tell you to</p> <p>17 expect that you were going to get contacted by the</p> <p>18 Palm Beach Police?</p> <p>19 A. No.</p> <p>20 Q. Did they tell you what you should say if</p> <p>21 you were interviewed about Mr. Epstein?</p> <p>22 A. No.</p> <p>23 Q. Anything else you can recall them saying</p> <p>24 to you during this conversation during the meeting</p> <p>25 at the Don Shula Hotel?</p>
<p>1 A. I don't remember, sir, right now.</p> <p>2 Q. Okay. And then you met with them at the</p> <p>3 Don Shula Hotel?</p> <p>4 A. Yes.</p> <p>5 Q. For approximately two hours?</p> <p>6 A. Yes.</p> <p>7 Q. And what did you discuss?</p> <p>8 A. They ask me who I talk to and that Mr.</p> <p>9 Epstein wanted to offer me a lawyer, I declined</p> <p>10 because I was working there, I had nothing to do</p> <p>11 with this. My wife told me this but, you know, I</p> <p>12 don't need a lawyer, why do I need a lawyer.</p> <p>13 Q. Your wife told you you didn't need a</p> <p>14 lawyer?</p> <p>15 A. Yeah, something to that, you know. They</p> <p>16 offered me because working for Mr. Epstein maybe I</p> <p>17 had something to do, anything, I haven't done</p> <p>18 anything wrong so I said I declined.</p> <p>19 Q. Did they interview you about what you</p> <p>20 observed while you were working at the house?</p> <p>21 A. I'm sorry, what?</p> <p>22 Q. Did they interview you about what you</p> <p>23 observed while you were working at Mr. Epstein's</p> <p>24 residence?</p> <p>25 A. Yes.</p>	<p>Page 131</p> <p>1 A. No.</p> <p>2 Q. Did they make any kind of threat to you?</p> <p>3 A. No, I don't believe so.</p> <p>4 Q. You don't believe so?</p> <p>5 A. No.</p> <p>6 Q. Was there anything they knew about you</p> <p>7 that you may have been surprised about?</p> <p>8 A. I'm sorry, what was that?</p> <p>9 Q. Was there any information that they knew</p> <p>10 about you that you were surprised they knew about?</p> <p>11 A. No, no.</p> <p>12 Q. Did you have any other meetings with</p> <p>13 them?</p> <p>14 A. I saw them twice.</p> <p>15 Q. Okay. Once was at the Don Shula Hotel?</p> <p>16 A. Yes. And the other one we met I think</p> <p>17 that was outside my house. He came into my house.</p> <p>18 Q. Was that a planned meeting?</p> <p>19 A. No, he just -- my main gate told me that</p> <p>20 so and so is -- you know, so he was waiting at my</p> <p>21 house.</p> <p>22 MS. EZELL: I'm sorry, who told you?</p> <p>23 THE WITNESS: I have security at the</p> <p>24 complex where I live and they told me that</p> <p>25 this gentleman was waiting for me.</p>

<p style="text-align: right;">Page 134</p> <p>1 MS. EZELL: The main gate, is that what 2 you said?</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. MERMELSTEIN:</p> <p>5 Q. Okay. So that was an unplanned visit?</p> <p>6 A. Yes.</p> <p>7 Q. That was after the meeting at the Don 8 Shula Hotel or before?</p> <p>9 A. That was before.</p> <p>10 Q. So I understand the sequence, two men 11 came to your door when your wife was there. 12 Correct?</p> <p>13 A. Actually -- yes, yes, exactly. Then we 14 met at the Don Shula.</p> <p>15 Q. So then you met at the Don Shula?</p> <p>16 A. Yes.</p> <p>17 Q. And when did the man come to your house?</p> <p>18 A. It was like two weeks before that or 19 something like that.</p> <p>20 Q. Two weeks before you met at the Don 21 Shula?</p> <p>22 A. Yes.</p> <p>23 Q. And what did you discuss when he came to 24 your house?</p> <p>25 A. The same questions I told the guy in Don</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. And your understanding of that was that 2 was indefinite, that would last --</p> <p>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.</p> <p>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.</p> <p>12 Q. All right. I understand. But you 13 understand that a confidentiality agreement -- let 14 me strike that.</p> <p>15 I assume your understanding or is your 16 understanding -- let me start again.</p> <p>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?</p> <p>22 A. Exactly.</p> <p>23 Q. When these investigators came to your 24 door did you have to verify that they in fact 25 worked for Mr. Epstein?</p>
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<p style="text-align: right;">Page 135</p> <p>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.</p> <p>4 Q. And you hadn't spoken to anybody about 5 Mr. Epstein before that?</p> <p>6 A. No.</p> <p>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?</p> <p>10 A. Yes.</p> <p>11 Q. And you don't recall his name?</p> <p>12 A. No, sir.</p> <p>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?</p> <p>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.</p> <p>19 Q. Okay. So you signed a confidentiality 20 agreement with Mr. Epstein?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. When did you sign that?</p> <p>23 A. When I was hired.</p> <p>24 Q. And what did that agreement provide?</p> <p>25 A. I shouldn't discuss anything, you know.</p>	<p style="text-align: right;">Page 137</p> <p>1 A. They gave me all the information, they 2 told me I'm the head of security for Mr. Epstein.</p> <p>3 Q. Okay.</p> <p>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.</p> <p>8 Q. Okay. You think you still have the 9 business cards still?</p> <p>10 A. Yes.</p> <p>11 Q. What about the confidentiality agreement, 12 do you still have that?</p> <p>13 A. No, that was kept with Mr. Epstein.</p> <p>14 Q. He didn't give you a copy?</p> <p>15 A. No.</p> <p>16 Q. Did you have an employment contract?</p> <p>17 A. No.</p> <p>18 Q. Did you ever speak to any lawyer 19 representing Mr. Epstein?</p> <p>20 A. Yes.</p> <p>21 Q. Who did you speak to?</p> <p>22 A. Jack Goldberger.</p> <p>23 Q. When did you talk to Mr. Goldberger?</p> <p>24 A. This was a year ago -- no, two years ago.</p> <p>25 Q. Was this before or after you had spoken</p>
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<p>1 to the detective --</p> <p>2 A. After.</p> <p>3 Q. Let me finish the question. Was this</p> <p>4 before or after you spoke to Detective Recarey?</p> <p>5 A. After.</p> <p>6 Q. And what did Mr. Goldberger say to you,</p> <p>7 what did you say to him?</p> <p>8 A. I said to him the FBI is involved now and</p> <p>9 I want to know what I'm supposed to do.</p> <p>10 Q. Did you contact Mr. Goldberger?</p> <p>11 A. Yes.</p> <p>12 Q. So he didn't call you, you called him?</p> <p>13 A. No, I called him.</p> <p>14 Q. How did you know to call him?</p> <p>15 A. Because I looked in the yellow pages.</p> <p>16 Q. But you knew Mr. Epstein's lawyer was</p> <p>17 Jack Goldberger?</p> <p>18 A. Yeah, exactly, because I was looking at</p> <p>19 the news. I read the Palm Beach Daily News every</p> <p>20 day so I call him and then the FBI, very nice</p> <p>21 people, they said they wanted to meet with me.</p> <p>22 Q. Okay. So this is before you met with the</p> <p>23 FBI agents you spoke with Jack Goldberger.</p> <p>24 Correct?</p> <p>25 A. Yes.</p>	<p>Page 138</p> <p>1 speak with you?</p> <p>2 A. Yes.</p> <p>3 Q. So before you spoke with them you called</p> <p>4 Mr. Goldberger?</p> <p>5 A. Yes.</p> <p>6 Q. Why?</p> <p>7 A. Because I wanted to see if I have any --</p> <p>8 I don't know, I didn't have a lawyer on my side, I</p> <p>9 wanted to see -- I feel like -- I don't know, I</p> <p>10 needed legal advice and somehow I call him. I</p> <p>11 should have had my own attorney but, you know, he</p> <p>12 said it's okay, you know, just speak the truth.</p> <p>13 Q. Okay. Again, what else do you recall</p> <p>14 about the conversation that you had?</p> <p>15 A. With Jack Goldberger?</p> <p>16 Q. Yes.</p> <p>17 A. That was very brief conversation, you</p> <p>18 know, I ask him this and he said tell the truth.</p> <p>19 Q. Was it by telephone?</p> <p>20 A. Yes, by phone, I never met him in person.</p> <p>21 Q. And all you recall him telling you was</p> <p>22 say the truth?</p> <p>23 A. Yes.</p> <p>24 Q. And then you met with the FBI agents?</p> <p>25 A. Yes.</p>
<p>Page 139</p> <p>1 Q. Okay. And you knew Jack Goldberger was</p> <p>2 the attorney for Jeffrey Epstein because you read</p> <p>3 that in the newspaper?</p> <p>4 A. Yes.</p> <p>5 Q. Again, about how long ago was this?</p> <p>6 A. That was -- I was working for the</p> <p>7 Hammond's so that was in 2006.</p> <p>8 Q. Okay. Had you received a grand jury</p> <p>9 subpoena?</p> <p>10 A. No, no. We just -- they asked me, they</p> <p>11 went to my house again.</p> <p>12 Q. The FBI again?</p> <p>13 A. Yes. A male and female agents, my wife</p> <p>14 told them I was working in Palm Beach and I</p> <p>15 couldn't leave so they wanted to meet me there.</p> <p>16 Q. In Palm Beach?</p> <p>17 A. Yes.</p> <p>18 Q. But you found out that they were looking</p> <p>19 for you, you called Jack Goldberger?</p> <p>20 A. No, no, that was --</p> <p>21 Q. Go ahead and clarify that, sorry.</p> <p>22 A. Okay. Yeah, I called him before I met</p> <p>23 the FBI I called Jack Goldberger.</p> <p>24 Q. I guess my question is, at the time you</p> <p>25 called him did you know that the FBI wanted to</p>	<p>Page 141</p> <p>1 Q. In Palm Beach?</p> <p>2 A. In Palm Beach.</p> <p>3 Q. And that was when you were working there?</p> <p>4 A. I'm sorry?</p> <p>5 Q. That was when you were working as a house</p> <p>6 manager in Palm Beach?</p> <p>7 A. Yes.</p> <p>8 Q. Any other lawyers you speak to for Mr.</p> <p>9 Epstein?</p> <p>10 A. I contacted him.</p> <p>11 Q. You contacted Mr. Critton?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. When did you do that?</p> <p>14 A. When I find out that Mr. Epstein was</p> <p>15 going to be out and I say, well, I don't know if</p> <p>16 anybody was going to contact me or something.</p> <p>17 Like I said before, you know, he was</p> <p>18 probably on my side that I want to know if I need</p> <p>19 to do something because I'm a witness, very</p> <p>20 important witness in this case and so I told him</p> <p>21 exactly what I'm telling you today, and he pay for</p> <p>22 my gas because my car was -- and that's it.</p> <p>23 Q. Okay. So you called Mr. Critton, he</p> <p>24 didn't call you?</p> <p>25 A. No, I call him.</p>

<p style="text-align: right;">Page 142</p> <p>1 Q. Okay. And this was when you found out 2 that Mr. --</p> <p>3 A. No, I called Jack Goldberger, I'm sorry, 4 and somebody give me his number.</p> <p>5 Q. I see. And what prompted you to call him 6 was you saw that Mr. Epstein was getting out of 7 jail?</p> <p>8 A. Yes.</p> <p>9 MR. CRITTON: Him meaning Mr. Goldberger?</p> <p>10 MR. MERMELSTEIN: Yes.</p> <p>11 BY MR. MERMELSTEIN:</p> <p>12 Q. I'll restate the question.</p> <p>13 When you called Mr. Goldberger it was 14 because you had read that Mr. Epstein was getting 15 out of jail?</p> <p>16 A. Yes.</p> <p>17 Q. Why did that prompt you to seek legal 18 advice or legal counsel?</p> <p>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.</p> <p>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.</p> <p>4 Q. It was with his assistant?</p> <p>5 A. Yes.</p> <p>6 Q. You didn't speak to him personally?</p> <p>7 A. No, we sit down in a room.</p> <p>8 Q. So you drove up to West Palm Beach?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. And you had a sit down meeting 11 with Mr. Critton?</p> <p>12 A. Yes.</p> <p>13 Q. About how long did that last?</p> <p>14 A. Two hours, something like that.</p> <p>15 Q. Any other lawyers did you speak to about 16 Mr. Epstein?</p> <p>17 A. No.</p> <p>18 Q. Any other investigators that you haven't 19 mentioned yet today that you spoke to about Mr. 20 Epstein?</p> <p>21 A. No.</p> <p>22 Q. Okay. Any other person employed by Mr. 23 Epstein did you speak to after --</p> <p>24 A. No.</p> <p>25 Q. Current or former employees, did you</p>
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<p style="text-align: right;">Page 143</p> <p>1 today, the first subpoena?</p> <p>2 A. Before.</p> <p>3 Q. Before you were subpoenaed?</p> <p>4 A. Before.</p> <p>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?</p> <p>9 A. I think you're right. I got the 10 subpoena, yes, yes.</p> <p>11 Q. Okay. You got the subpoena for the civil 12 deposition?</p> <p>13 A. Yes, exactly.</p> <p>14 Q. Which is why we're here today?</p> <p>15 A. Exactly.</p> <p>16 Q. And after you received that subpoena you 17 called Mr. Goldberger?</p> <p>18 A. Yes.</p> <p>19 Q. And he referred you to Mr. Critton?</p> <p>20 A. Yes.</p> <p>21 Q. And then you spoke to Mr. Critton?</p> <p>22 A. Yes.</p> <p>23 Q. And what did you say to him, what did he 24 say to you?</p> <p>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?</p> <p>2 A. No.</p> <p>3 Q. You never spoke to Sarah Kellen again?</p> <p>4 A. No.</p> <p>5 Q. Did you have a cell phone when you worked 6 for Mr. Epstein?</p> <p>7 A. Yes, I did.</p> <p>8 Q. Was that a cell phone provided by Mr. 9 Epstein?</p> <p>10 A. Yes.</p> <p>11 Q. What was the phone number on that?</p> <p>12 A. Area code 561 but I don't remember.</p> <p>13 Q. What was the -- do you remember the 14 service provider?</p> <p>15 A. AT&amp;T.</p> <p>16 Q. That account was in the name of Mr. 17 Epstein?</p> <p>18 A. Yes.</p> <p>19 MR. CRITTON: Form.</p> <p>20 BY MR. MERMELSTEIN:</p> <p>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?</p> <p>24 A. No.</p> <p>25 Q. And he never gave anything back to you;</p>
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<p>1 correct, that you handed to him?</p> <p>2 A. I'm sorry, who?</p> <p>3 Q. Detective Recarey.</p> <p>4 A. No, sir.</p> <p>5 Q. Did you ever give any papers to any of</p> <p>6 the lawyers for Mr. Epstein either Mr. Goldberger</p> <p>7 or Mr. Critton?</p> <p>8 A. No.</p> <p>9 Q. What about the investigators, did you</p> <p>10 give them any papers or documents?</p> <p>11 A. No.</p> <p>12 Q. I'm going to ask you some names of girls</p> <p>13 who are alleged to have come over to the house,</p> <p>14 Mr. Epstein's residence in Palm Beach and ask you</p> <p>15 if you recall these girls or what you recall.</p> <p>16 H.R.?</p> <p>17 A. I believe so.</p> <p>18 MR. CRITTON: I'm sorry?</p> <p>19 THE WITNESS: I believe so.</p> <p>20 BY MR. MERMELSTEIN:</p> <p>21 Q. What do you remember about H.R.?</p> <p>22 A. She used to come to the house.</p> <p>23 Q. And did you bring her into the kitchen?</p> <p>24 A. All the girls I brought into the kitchen,</p> <p>25 it was the same routine.</p>	<p>Page 146</p> <p>1 Q. But you don't remember?</p> <p>2 A. I don't remember.</p> <p>3 Q. Why do you say probably you did?</p> <p>4 A. Because I was the person in charge of</p> <p>5 paying and I probably did because if it was not me</p> <p>6 it was her.</p> <p>7 Q. Because what?</p> <p>8 A. If it was not me it was Sarah.</p> <p>9 Q. If it wasn't you it was Sarah. Okay.</p> <p>10 But you were paying girls for 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. V., do you recall a girl named V.?</p> <p>16 A. No.</p> <p>17 Q. V.Z.?</p> <p>18 A. No.</p> <p>19 Q. Does that ring a bell at all?</p> <p>20 A. No.</p> <p>21 Q. How about Y.?</p> <p>22 A. No, sir.</p> <p>23 Q. Y.L.?</p> <p>24 A. No.</p> <p>25 Q. M.L.?</p>
<p>1 Q. Okay. Was it your understanding she came</p> <p>2 to give Mr. Epstein a massage?</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. Did she come with another girl?</p> <p>7 A. I don't remember, sir.</p> <p>8 Q. Did she come often?</p> <p>9 A. I'm sorry?</p> <p>10 Q. Would she come to the house often?</p> <p>11 A. Yes.</p> <p>12 Q. You don't remember whether she came</p> <p>13 alone, with another girl, or two other girls?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: I don't remember, sir.</p> <p>16 BY MR. MERMELSTEIN:</p> <p>17 Q. Did you ever see Mr. Epstein and H.R.</p> <p>18 together?</p> <p>19 A. No.</p> <p>20 Q. You would just escort her into the</p> <p>21 kitchen?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Did you pay H.R.?</p> <p>24 A. I don't remember, sir. Probably I did,</p> <p>25 sir.</p>	<p>Page 147</p> <p>1 A. No.</p> <p>2 Q. What about F.P.?</p> <p>3 A. Who?</p> <p>4 Q. F.P.</p> <p>5 A. No, sir.</p> <p>6 Q. You don't recall any of those names. You</p> <p>7 indicated you used the computer in the house?</p> <p>8 A. Yes.</p> <p>9 Q. Did he have a server where all the</p> <p>10 computers are linked?</p> <p>11 A. We used to Citrix but because there were</p> <p>12 too many properties we used to have a guy who used</p> <p>13 to take care of the --</p> <p>14 Q. Were the computers linked in Florida and</p> <p>15 New York?</p> <p>16 A. I believe so, yes.</p> <p>17 Q. Were there data files on the computers --</p> <p>18 MR. CRITTON: Form.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. -- in the house?</p> <p>21 A. I don't know, sir, because I was using my</p> <p>22 own computer and they have their own computers</p> <p>23 inside the house.</p> <p>24 Q. Okay. So you had your own computer?</p> <p>25 A. Yes.</p>

<p>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</p>	<p>Page 150</p> <p>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?</p>
<p>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.</p>	<p>Page 151</p> <p>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?</p>

<p>1 A. They all --</p> <p>2 Q. But some of them had accents?</p> <p>3 A. Yes.</p> <p>4 Q. Were they from one place in particular?</p> <p>5 A. Europe.</p> <p>6 Q. Eastern Europe?</p> <p>7 A. Could be.</p> <p>8 MR. CRITTON: Did you say could be, is that what you said?</p> <p>9 THE WITNESS: Could be.</p> <p>10 MR. CRITTON: Form.</p> <p>11 BY MR. MERMELSTEIN:</p> <p>12 Q. That would be your guess as to where they were from?</p> <p>13 A. Yes, but I'm not an expert in languages, sir, but they had accent.</p> <p>14 Q. Do you know how Mr. Epstein came into contact with these girls or became friends with them?</p> <p>15 A. No, sir.</p> <p>16 Q. Did you ever talk to any of them about how they met Mr. Epstein?</p> <p>17 A. No.</p> <p>18 Q. Did you and the other members of the staff that worked for you, did you ever talk about</p>	<p>Page 154</p> <p>1 Q. Okay. But you did speculate with Louella about the girls who stayed at the house and flew in with Mr. Epstein. Correct?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Sometimes, yes.</p> <p>4 BY MR. MERMELSTEIN:</p> <p>5 Q. Were there rumors that either you or her heard about those girls?</p> <p>6 MR. CRITTON: Form.</p> <p>7 THE WITNESS: No.</p> <p>8 BY MR. MERMELSTEIN:</p> <p>9 Q. Do you remember anything more specific about things Louella may have observed about these girls?</p> <p>10 A. No.</p> <p>11 Q. Anyone else that you spoke to about --</p> <p>12 A. No, nobody.</p> <p>13 Q. Nobody else on the staff you ever spoke to about any of the girls?</p> <p>14 A. No.</p> <p>15 MR. MERMELSTEIN: Why don't we break and I'm going to pass the baton.</p> <p>16 THE VIDEOGRAPHER: We're off the record.</p> <p>17 (Thereupon, a recess was had.)</p> <p>18 THE VIDEOGRAPHER: We're back on the</p>
<p>1 Mr. Epstein?</p> <p>2 A. Sometimes.</p> <p>3 Q. What kind of things would you talk about?</p> <p>4 A. Where do you think these girls are from, what are they doing, you know, are they going to college, Louella used to ask me that, but I mean, beyond that we didn't --</p> <p>5 Q. By these girls which ones are you referring to?</p> <p>6 A. The one that were coming in the plane.</p> <p>7 Q. Plane. You didn't have that kind of --</p> <p>8 A. Louella was gone by 5:00. Five p.m. she was gone. She would work from eight to five. So most of the early evening I was there by myself.</p> <p>9 Q. Okay. But the question was, did you ever talk with Louella about the girls who were coming for massages?</p> <p>10 A. No.</p> <p>11 Q. And that would have been before 5:00 as well. Right?</p> <p>12 A. Yeah.</p> <p>13 Q. So she saw girls coming?</p> <p>14 A. Yeah, exactly, but we never -- we didn't have a chance because we were busy, you know. But we never had that conversation.</p>	<p>Page 155</p> <p>1 record tape with number four.</p> <p>2 EXAMINATION</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. Mr. Rodriguez, my name is Brad Edwards, I represent in these cases E.W. who is -- and I'll tell you right now, C.W., we talked about earlier --</p> <p>5 (Thereupon, an interruption was had.)</p> <p>6 MR. CRITTON: We're ready.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. I represent L.M., who is T.M., I'm going to ask you some questions about her as well, and Jane Doe, S.R.</p> <p>9 Are those names that you're familiar with?</p> <p>10 A. Currently, yes.</p> <p>11 Q. How about T.?</p> <p>12 A. How do you spell her?</p> <p>13 Q. (Off the record.)</p> <p>14 A. Yeah, I remember her.</p> <p>15 Q. You remember what she looks like?</p> <p>16 A. If I see her I will remember her.</p> <p>17 Q. During the six month or so period that you worked there how often would you see T.?</p> <p>18 A. Okay, to answer the question, when Mr.</p>

<p style="text-align: right;">Page 158</p> <p>1 Epstein was not there obviously the house was shut 2 down. When Mr. Epstein was here probably twice a 3 week.</p> <p>4 Q. Okay. And going back to C.W., how often 5 would you see her?</p> <p>6 A. More often.</p> <p>7 Q. More often than T.?</p> <p>8 A. Yeah.</p> <p>9 Q. If you saw T. twice a week then how often 10 would you see C.?</p> <p>11 A. I will say three to four times.</p> <p>12 Q. Per week?</p> <p>13 A. Yes.</p> <p>14 Q. And do you remember S.R. at all?</p> <p>15 A. She goes under another name?</p> <p>16 Q. I wouldn't think so.</p> <p>17 A. No, I don't remember her.</p> <p>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?</p> <p>21 A. Yes. C. used to call me.</p> <p>22 Q. She used to call you directly?</p> <p>23 A. Yeah, no, well, I used to take the 24 message from her, I clearly remember that, but not 25 S. or --</p>	<p style="text-align: right;">Page 160</p> <p>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?</p> <p>4 MR. CRITTON: Form.</p> <p>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.</p> <p>13 BY MR. EDWARDS:</p> <p>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?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: I don't remember that.</p> <p>19 BY MR. EDWARDS:</p> <p>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?</p> <p>24 A. Yes.</p> <p>25 Q. It seemed like she was relatively the age</p>
<p style="text-align: right;">Page 159</p> <p>1 Q. T.?</p> <p>2 A. T.</p> <p>3 Q. When C. would call you what would she 4 typically say to you?</p> <p>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.</p> <p>8 Q. Okay. And when C. herself would come to 9 Jeffrey Epstein's house, what would she come there 10 to do?</p> <p>11 MR. CRITTON: Form.</p> <p>12 THE WITNESS: I assume they were 13 massages.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. Okay. You thought that C.W. was a 16 masseuse?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. You mentioned earlier you have a 19 daughter. Right?</p> <p>20 A. Yes.</p> <p>21 Q. And your daughter is 20?</p> <p>22 A. 20, and I have a 16 year old.</p> <p>23 Q. C.W. is 21, so back in 2004, 2005, we're 24 talking about a 15 year old girl.</p> <p>25 Is that you thought that the 15 year old</p>	<p style="text-align: right;">Page 161</p> <p>1 of your daughter?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: It's hard to say.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. You wouldn't be shocked to know that she 6 was the age of your daughter though. Right?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. EDWARDS:</p> <p>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?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: (Shakes head.)</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. For the record, I just need you to answer 19 out loud.</p> <p>20 A. No.</p> <p>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</p>

<p style="text-align: right;">Page 162</p> <p>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</p>	<p style="text-align: right;">Page 164</p> <p>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</p>
<p style="text-align: right;">Page 163</p> <p>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</p>	<p style="text-align: right;">Page 165</p> <p>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</p>

<p>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</p>	<p>Page 166</p> <p>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.</p>
<p>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 --</p>	<p>Page 169</p> <p>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.</p>

<p>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</p>	<p>Page 170</p> <p>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</p>
<p>Page 171</p> <p>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</p>	<p>Page 173</p> <p>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?</p>

<p>1 A. Yes.</p> <p>2 Q. Okay. Ever since this communication that</p> <p>3 Ms. Maxwell made to you where she called you</p> <p>4 sometime in May or June of 2005, and have you felt</p> <p>5 threatened?</p> <p>6 A. Yes.</p> <p>7 MR. CRITTON: Form.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Have you felt reluctant to come forward</p> <p>10 and give truthful, honest, and full disclosure of</p> <p>11 all information that you know about this case?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: I said this off the record</p> <p>14 but I will say it on the record, being in</p> <p>15 the Epstein case for me resulted in two</p> <p>16 years I have -- I won't bring the names but</p> <p>17 I was in the third interview to get hired as</p> <p>18 a household manager in Palm Beach and they</p> <p>19 told me you are the Jeffrey Epstein guy.</p> <p>20 Not in the sense I did something wrong</p> <p>21 because of the scandal, so they shun the job</p> <p>22 away from me. And so I was afraid that --</p> <p>23 this is very powerful people and one phone</p> <p>24 call and you finish, so I'm the little guy.</p> <p>25 Even I'm wearing a tie I'm a -- I'm talking</p>	<p>Page 174</p> <p>1 this. Because I went through -- the first</p> <p>2 time I went to the deposition I was in Palm</p> <p>3 Beach and I did my duty, I mean, I tell what</p> <p>4 I know, but now I know there is more</p> <p>5 digging, all I want is this to be to get on</p> <p>6 with my normal life and stuff.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. So when you come here today to testify,</p> <p>9 your main objective is to get back to your normal</p> <p>10 life and get out of the spotlight of this case.</p> <p>11 Yes?</p> <p>12 A. Yes.</p> <p>13 Q. And in doing so have you held back some</p> <p>14 of the details that you know about that happened</p> <p>15 in this case to remove yourself from the</p> <p>16 spotlight?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: No, sir.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. Okay. Have you ever talked to Ghislaine</p> <p>21 Maxwell after that telephone call where she called</p> <p>22 you and you felt threatened?</p> <p>23 A. No.</p> <p>24 Q. Okay. So going back to where we started</p> <p>25 here was, does Ghislaine Maxwell have knowledge of</p>
<p>1 from my heart. This is the way it is.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. I feel for you, I'm sorry that you have</p> <p>4 to be in this position.</p> <p>5 MR. CRITTON: Move to strike this.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. Well, when you applied for these jobs and</p> <p>8 they turned you down and gave you the reason that</p> <p>9 you're the person involved in the Jeffrey Epstein</p> <p>10 scandal, was it that they are associated or</p> <p>11 friends with Jeffrey Epstein or is it that you</p> <p>12 have information and you have this confidentiality</p> <p>13 but you're revealing some certain information that</p> <p>14 Mr. Epstein would not like?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Both.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. Both?</p> <p>19 A. Both.</p> <p>20 Q. And since then given what you just told</p> <p>21 us about these people being very powerful, are you</p> <p>22 afraid for your life given the fact that you're</p> <p>23 involved to some extent in this case?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: I just start thinking about</p>	<p>Page 175</p> <p>1 the girls that would come over to Jeffrey</p> <p>2 Epstein's house that are in roughly the same age</p> <p>3 group as C. and T. and to have a good time as you</p> <p>4 put it?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. And what was her involvement and/or</p> <p>9 knowledge about that?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: She knew what was going on.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. You referred to her at one point in time</p> <p>14 as Jeffrey Epstein's companion. But then later on</p> <p>15 you said that if she flew she flew on a different</p> <p>16 airplane and oftentimes or sometimes she slept in</p> <p>17 a different bed from Mr. Epstein. Did that seem</p> <p>18 unusual to you?</p> <p>19 MR. CRITTON: Form.</p> <p>20 THE WITNESS: It was odd but, I mean, and</p> <p>21 again, everything is odd in Palm Beach.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. Okay, I don't mean to laugh.</p> <p>24 A. Mr. Epstein fly to Jet Aviation, she fly</p> <p>25 to Galaxy Aviation, but they never flew the same</p>

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

<p>1 all of them?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: They were not carrying</p> <p>4 massage tables, no.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. So when C. and a friend would be lead</p> <p>7 upstairs would they go into the room with Mr.</p> <p>8 Epstein together?</p> <p>9 A. I was not there.</p> <p>10 Q. All right. So that's when you exited to</p> <p>11 the other house?</p> <p>12 A. I escorted them to the kitchen and they</p> <p>13 went through the stairwell upstairs.</p> <p>14 Q. All right. Sometimes you went in after</p> <p>15 the massages to clean up the room. Is that right?</p> <p>16 A. Right, when Mr. Epstein go out of the</p> <p>17 house.</p> <p>18 Q. After he was out of the house?</p> <p>19 A. Yes.</p> <p>20 Q. What other indications besides their age,</p> <p>21 what other indications were there that there was</p> <p>22 something more than a massage going on in the</p> <p>23 room?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: I don't know.</p>	<p>Page 182</p> <p>1 Q. You didn't?</p> <p>2 A. No.</p> <p>3 Q. I'm going to go to the police report that</p> <p>4 we have that mentions your name in it in several</p> <p>5 places. All right. I think the first time that</p> <p>6 we find your name is page 50 at the bottom. This</p> <p>7 is not a transcript of any statement that you gave</p> <p>8 so I want to read some of it and you tell me is</p> <p>9 this accurate or does it accurately reflect what</p> <p>10 you told Detective Recarey. Okay.</p> <p>11 A. Okay.</p> <p>12 MR. CRITTON: Just object to the</p> <p>13 procedure. I think that's improper, if</p> <p>14 you're trying to accredit him it's improper,</p> <p>15 if you're trying to impeach him it's</p> <p>16 improper. But go, do what you want.</p> <p>17 MR. EDWARDS: I said it's not a</p> <p>18 statement. Do you want to give me the</p> <p>19 statement?</p> <p>20 BY MR. EDWARDS:</p> <p>21 Q. Mr. Rodriguez stated he had worked with</p> <p>22 Epstein for approximately six months after the</p> <p>23 previous houseman left. Correct?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: Yes.</p>
<p>Page 183</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q. Just your fatherly instinct told you</p> <p>3 that; is that it?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. And when T. would come over would she</p> <p>8 normally bring others with her?</p> <p>9 A. Usually they came in couples, but</p> <p>10 sometimes I wouldn't say never happened but</p> <p>11 probably they were by themselves.</p> <p>12 Q. Okay. But your feeling was when they</p> <p>13 came in groups was because they felt more</p> <p>14 comfortable in a group?</p> <p>15 A. Yes.</p> <p>16 MR. CRITTON: Form.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. Were you ever aware or am I the first to</p> <p>19 tell you that Mr. Epstein would offer them money</p> <p>20 for their services in the bedroom as well as money</p> <p>21 for every single girl that they brought him? Am I</p> <p>22 the first to tell you that?</p> <p>23 MR. CRITTON: Form.</p> <p>24 THE WITNESS: No, I didn't know that.</p> <p>25 BY MR. EDWARDS:</p>	<p>Page 185</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q. He stated that it was his responsibility</p> <p>3 to keep the identity of the masseuses private.</p> <p>4 A. Yes.</p> <p>5 MR. CRITTON: Form.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. And is that something that you told Mr.</p> <p>8 -- Detective Recarey that it was your</p> <p>9 responsibility to keep the identity of the</p> <p>10 masseuses private?</p> <p>11 A. That was part of my job.</p> <p>12 Q. Who delegated that particular</p> <p>13 responsibility, is that Sarah Kellen or Jeffrey</p> <p>14 Epstein?</p> <p>15 A. Sarah Kellen.</p> <p>16 Q. What specifically did she tell you about</p> <p>17 keeping the identity of the masseuses private?</p> <p>18 A. Everything in the house was confidential.</p> <p>19 And we didn't -- several times, you know, whatever</p> <p>20 was going on in the house Sarah told me, you know</p> <p>21 you're not suppose to say this, we know because I</p> <p>22 signed 27 pages of confidentiality agreement.</p> <p>23 Q. The confidentiality agreement that you</p> <p>24 referred to earlier was 27 pages long?</p> <p>25 A. Yes, something like that.</p>

<p>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</p>	<p>Page 186</p> <p>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?</p>
<p>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</p>	<p>Page 187</p> <p>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.</p>

<p>1 BY MR. EDWARDS:</p> <p>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?</p> <p>5 A. Yes.</p> <p>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?</p> <p>10 MR. CRITTON: Form.</p> <p>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.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. No, no, no. You're misunderstanding my 18 question, or I'm just not communicating well with 19 you.</p> <p>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?</p> <p>23 A. Yes.</p> <p>24 MR. CRITTON: Form.</p> <p>25 BY MR. EDWARDS:</p>	<p>Page 190</p> <p>1 is not a professional masseuse that's showing up 2 at his house, they're showing up in a taxicab.</p> <p>3 Right?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. EDWARDS:</p> <p>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.</p> <p>12 MR. CRITTON: Form.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. Right?</p> <p>15 MR. CRITTON: Form, argumentative.</p> <p>16 THE WITNESS: In fairness it's hard to 17 say.</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. What was going on behind closed doors?</p> <p>20 A. Exactly.</p> <p>21 Q. Why earlier did you say you had the 22 feeling that there was something more going on 23 than a masseuse?</p> <p>24 A. In terms of fun. You don't know if it's 25 -- I have to say this. Some of this lawsuit is</p>
<p>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?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: More or less.</p> <p>7 BY MR. EDWARDS:</p> <p>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?</p> <p>12 MR. CRITTON: Form.</p> <p>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.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. Well, you testified that some of them 18 would show up in taxicabs. Right?</p> <p>19 A. Yeah.</p> <p>20 Q. That's a little odd for a masseuse.</p> <p>21 Right?</p> <p>22 MR. CRITTON: Form.</p> <p>23 THE WITNESS: (Shakes head.)</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. I mean, that's one indication that this</p>	<p>Page 191</p> <p>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.</p> <p>4 MR. CRITTON: Let me put an objection in, 5 move to strike, I'm not sure what that was 6 responsive to.</p> <p>7 BY MR. EDWARDS:</p> <p>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.</p> <p>13 Right?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: Is that what you asked me?</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. Yes.</p> <p>18 A. Yes.</p> <p>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?</p> <p>22 MR. CRITTON: Form.</p> <p>23 THE WITNESS: I have to say yes or no or 24 I have to give my opinion on that?</p> <p>25 BY MR. EDWARDS:</p>

<p style="text-align: right;">Page 194</p> <p>1 Q. Sure, go ahead and answer however you 2 want.</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: I don't think it was right.</p> <p>5 BY MR. EDWARDS:</p> <p>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?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: I been asked that question 12 before.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. Excuse me?</p> <p>15 A. I been asked that question before.</p> <p>16 Q. By whom?</p> <p>17 A. Palm Beach Police Department.</p> <p>18 Q. Did you give the same answer that you did 19 not think it was right?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. EDWARDS:</p> <p>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.</p> <p>2 MR. CRITTON: Form.</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. I think that the next time you're 5 mentioned in the report, I believe it's page 70.</p> <p>6 MS. EZELL: Off the record briefly.</p> <p>7 (Thereupon, a discussion was had off the 8 record.)</p> <p>9 BY MR. EDWARDS:</p> <p>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.</p> <p>15 This is an investigator saying you just 16 weren't home or something. Right?</p> <p>17 A. But I never elude anybody.</p> <p>18 Q. You never intentionally tried to avoid 19 the police officers?</p> <p>20 A. No, no, never.</p> <p>21 Q. Okay.</p> <p>22 MR. CRITTON: So much for the police 23 report.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. All right. The bottom of page 70 says, I</p>
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<p style="text-align: right;">Page 195</p> <p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: Ask me your question again.</p> <p>3 BY MR. EDWARDS:</p> <p>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 --</p> <p>7 A. It wasn't.</p> <p>8 MR. CRITTON: Form.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. It wasn't right?</p> <p>11 A. It wasn't.</p> <p>12 Q. And why not?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: Because I'm a father, I 15 have two daughters.</p> <p>16 BY MR. EDWARDS:</p> <p>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?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: I don't think that my 23 daughters would be doing that.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. You would hope not.</p>	<p style="text-align: right;">Page 197</p> <p>1 brought Mr. Rodriguez to the interview room.</p> <p>2 Were you taken to an interview room, to a 3 room in the police department?</p> <p>4 A. This was in the District Attorney's 5 Office.</p> <p>6 Q. Oh, it was at the State Attorney's 7 Office?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Was a State Attorney there as 10 well?</p> <p>11 A. Yes, Mrs. Weiss.</p> <p>12 Q. Daliah Weiss?</p> <p>13 A. Young lady, Weiss. D-E-I-S-S.</p> <p>14 Q. Okay. I have D-A-L-I-A-H, Daliah Weiss, 15 W-E-I-S-S.</p> <p>16 A. Yes.</p> <p>17 Q. That's her?</p> <p>18 A. Yeah.</p> <p>19 Q. Okay. Did she ask you any questions?</p> <p>20 A. Both of them.</p> <p>21 Q. Okay. So it was both -- if there is a --</p> <p>22 I think you said earlier there is a taped 23 statement, there is a tape of this?</p> <p>24 A. Yes.</p> <p>25 Q. If we listen to that tape if we ever get</p>
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<p style="text-align: right;">Page 198</p> <p>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:</p>	<p style="text-align: right;">Page 200</p> <p>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</p>
<p style="text-align: right;">Page 199</p> <p>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</p>	<p style="text-align: right;">Page 201</p> <p>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?</p>

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<p>1 A. I will say once a week we used to get a 2 call from him.</p> <p>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?</p> <p>6 A. No.</p> <p>7 Q. All right. Same question with Bill 8 Clinton, were you ever aware of him being involved 9 with any girls?</p> <p>10 A. No.</p> <p>11 Q. And David Copperfield?</p> <p>12 A. No.</p> <p>13 Q. What would he do when he was in town?</p> <p>14 A. He came to the house, played tricks and 15 he leave.</p> <p>16 Q. Did you watch?</p> <p>17 A. Yeah. Cards and --</p> <p>18 Q. That's nice, you get an up close and 19 personal show from David Copperfield.</p> <p>20 How often would David Copperfield and 21 Jeffrey Epstein talk?</p> <p>22 A. When I was there he was maybe two or 23 three times in the house.</p> <p>24 Q. Besides those guests have you pretty much 25 listed the guests that you were aware of?</p>	<p>1 A. Probably is.</p> <p>2 MR. CRITTON: Form, move to strike, it's 3 a guess, speculation.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. When you say he probably is, what are you 6 basing that on?</p> <p>7 A. Because he belongs to all the clubs in 8 Palm Beach.</p> <p>9 Q. Okay. But you don't have a list of all 10 of the clubs that he belongs to?</p> <p>11 A. I used to.</p> <p>12 Q. And on that list --</p> <p>13 A. I don't remember, you know.</p> <p>14 Q. Okay. Do you know where that list is?</p> <p>15 A. Probably it's in the house.</p> <p>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?</p> <p>21 A. Yes.</p> <p>22 MR. CRITTON: Form.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. They would then be encountered by Sarah 25 or Epstein.</p>

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<p>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.</p> <p>4 Q. Okay. And Donald Trump, did you ever see 5 him at the house?</p> <p>6 A. No, he used to call.</p> <p>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?</p> <p>10 A. Yes.</p> <p>11 Q. Did Mr. Epstein go to the Mara Lago Club?</p> <p>12 A. No.</p> <p>13 Q. Why not?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: He's a very private person.</p> <p>16 BY MR. EDWARDS:</p> <p>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?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. Are you aware, has he ever been there?</p> <p>24 A. That I don't know.</p> <p>25 Q. Do you know if he's a member?</p>	<p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: (Shakes head.)</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. Yes?</p> <p>5 A. (Shakes head.)</p> <p>6 Q. They would then be taken upstairs to 7 provide a massage. Right?</p> <p>8 MR. CRITTON: Form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q. Again, you don't know what happened 12 behind closed doors?</p> <p>13 A. No.</p> <p>14 Q. But you were told to refer to these girls 15 as masseuses?</p> <p>16 A. Yes.</p> <p>17 Q. Aside from being told that, you have 18 absolutely no idea what went on up there?</p> <p>19 A. No.</p> <p>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.</p> <p>24 A. Early 20's, you know. They're all very 25 young, but I mean, it's hard to say who's underage</p>

<p>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:</p>	<p>Page 206</p> <p>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.</p>
<p>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.</p>	<p>Page 207</p> <p>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</p>

<p>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</p>	<p>Page 210</p> <p>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.</p>
<p>Page 211</p> <p>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.)</p>	<p>Page 213</p> <p>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.</p>

<p>1 Q. Okay. Adriana Ross?</p> <p>2 A. There were two house managers in one year</p> <p>3 prior to me.</p> <p>4 Q. Do you know what Adriana Ross's position</p> <p>5 was at the house?</p> <p>6 A. No.</p> <p>7 Q. There is only a few more names.</p> <p>8 Brahakmana Mellawa and -- I can't even pronounce</p> <p>9 it. Mr. and Mrs. Mellawa?</p> <p>10 A. Yeah, they are from Bangladesh, they were</p> <p>11 the couple taking care --</p> <p>12 Q. That's the couple you referred to earlier</p> <p>13 from Bangladesh?</p> <p>14 A. Yes.</p> <p>15 Q. And Sarah Kellen. And Juan and Maria</p> <p>16 Alessi?</p> <p>17 A. Joe Alessi.</p> <p>18 Q. Do you still speak to any of those</p> <p>19 people?</p> <p>20 A. No. When I was there there was some mail</p> <p>21 that arrive so I contact them and say I have some</p> <p>22 mail, but other than that, no.</p> <p>23 Q. Okay. Do you know how to get in touch</p> <p>24 with any of these people?</p> <p>25 A. They're in the area. Joe Alessi has</p>	<p>Page 214</p> <p>1 that worked for Mr. Epstein or at that house?</p> <p>2 A. Jerome the gardener.</p> <p>3 Q. Okay.</p> <p>4 A. Jerome Pierre and the staff from New</p> <p>5 York. Once in awhile, Doug Shadow, he was the</p> <p>6 architect who used to come in in charge of</p> <p>7 renovation.</p> <p>8 Q. What about Nicole Hess?</p> <p>9 A. No.</p> <p>10 Q. You don't know who that is. All right.</p> <p>11 The exhibit that I believe is number one right now</p> <p>12 which is this message pad, there are numerous</p> <p>13 messages that have your initials, AR. But there</p> <p>14 are also messages that are on the same pad</p> <p>15 which --</p> <p>16 MR. CRITTON: What date are you looking</p> <p>17 at?</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. The very last day of this compilation</p> <p>20 1/30/05 and 2/2/05.</p> <p>21 A. These three are not my writing.</p> <p>22 Q. That's what I was going to ask you. This</p> <p>23 is a message pad that was in the house. Right?</p> <p>24 A. In the house, yes.</p> <p>25 Q. So you would think that the person that</p>
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<p>1 apartments there.</p> <p>2 Q. The lady that you're referring to that at</p> <p>3 some point in time saw these kids naked by the</p> <p>4 pool --</p> <p>5 A. Louella.</p> <p>6 MR. CRITTON: Form.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. But was there another girl who was in</p> <p>9 charge of cleaning the pool?</p> <p>10 A. No, no, the pool lady was a contractor</p> <p>11 from outside, she used to park the truck outside,</p> <p>12 and when she see that they're there she will tell</p> <p>13 me, Alfredo, I'll come back tomorrow because --</p> <p>14 Q. Were you familiar with another husband</p> <p>15 and wife that worked there, Patrick and Eve?</p> <p>16 A. Yeah, I believe so, Patrick, yeah.</p> <p>17 Q. And did he work there the same time you</p> <p>18 worked there?</p> <p>19 A. No, before me.</p> <p>20 Q. And do you know why they left?</p> <p>21 A. I think everybody quit because of the</p> <p>22 hectic schedule, you know, to be honest with you,</p> <p>23 but I don't know.</p> <p>24 Q. All right. But of the names that I</p> <p>25 listed is there anybody else that you remember</p>	<p>Page 215</p> <p>1 made that signature whoever that person is was</p> <p>2 also in the house. Right?</p> <p>3 A. Yes.</p> <p>4 Q. Who possibly would that be with the J.,</p> <p>5 it's just a J.?</p> <p>6 A. I don't know.</p> <p>7 Q. When you sat down today I remember you</p> <p>8 making a statement that something to the effect</p> <p>9 of, and I'm going to paraphrase, can you believe</p> <p>10 that they pulled these message pads out of the</p> <p>11 trash. Do you remember saying that?</p> <p>12 A. Yes.</p> <p>13 Q. How did you learn that they pulled the</p> <p>14 message pads from the trash?</p> <p>15 A. Because it was in the Palm Beach Daily</p> <p>16 News.</p> <p>17 Q. You read it in the paper?</p> <p>18 A. Yes.</p> <p>19 Q. So in addition to Googling the various</p> <p>20 people that were friends of Mr. Epstein you've</p> <p>21 kept up with what's going on in the investigation?</p> <p>22 A. Yeah, because it was my job so I'm</p> <p>23 working next door to this other lady and I want to</p> <p>24 know, it was in the news, you know, it's like a --</p> <p>25 MR. EDWARDS: All right. I have a lot to</p>
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<p>1 go but we can take a break.  2 THE VIDEOGRAPHER: We're off the record.  3 (Thereupon, a recess was had.)  4 THE VIDEOGRAPHER: We're back on the  5 record, tape number five.  6 BY MR. EDWARDS:  7 Q. I stopped with knew the girls -- sorry.  8 I stopped with the sentence in the police  9 report, page 71, he delivered a dozen roses to  10 Royal Palm Beach High School.  11 And that's something you told us about  12 earlier. Right?  13 A. Yes.  14 Q. Then it says, he knew the girls were  15 still in high school and were of high school age.  16 Speaking of the girls who were coming  17 over labelled as masseuses, is that something --  18 (Thereupon, an interruption was had.)  19 BY MR. EDWARDS:  20 Q. The statement is, he knew the girls were  21 still in high school and were of high school age.  22 That's something you agree with?  23 MR. CRITTON: Form, out of context.  24 THE WITNESS: I saw them in high school.  25 BY MR. EDWARDS:</p>	<p>Page 218</p> <p>1 there was more going on than just massages with  2 anybody else that worked at the house?  3 A. No.  4 Q. Did you talk about that with anybody  5 else?  6 A. No, nothing. This is the first time that  7 I said this openly because I was subpoenaed and  8 there were these things, you know.  9 Q. Right. And right now is the second time  10 you said it openly because you're subpoenaed  11 again?  12 A. Yes.  13 MR. CRITTON: Form.  14 BY MR. EDWARDS:  15 Q. Otherwise you have not expressed those  16 feelings to anybody else?  17 A. No.  18 Q. What about when you spoke with Mr.  19 Epstein's attorneys or investigators, did you talk  20 to them about that?  21 A. No.  22 Q. And why did you choose not to tell them  23 that you felt there were more -- that there was  24 more going on in the bedroom with these young  25 girls than just massages?</p>
<p>1 Q. The girls that we were talking about, and  2 I'm talking about C. and T. specifically, but  3 these are girls that looked of high school age to  4 you.  5 MR. CRITTON: Form.  6 THE WITNESS: It's hard to say.  7 BY MR. EDWARDS:  8 Q. That wouldn't shock you though?  9 MR. CRITTON: Form.  10 THE WITNESS: No.  11 BY MR. EDWARDS:  12 Q. Doesn't surprise you?  13 A. No.  14 MR. CRITTON: Form.  15 BY MR. EDWARDS:  16 Q. I asked Rodriguez about the massages, he  17 felt there was a lot more going on than just  18 massages.  19 Is that something you told him?  20 MR. CRITTON: Form.  21 THE WITNESS: Yes.  22 BY MR. EDWARDS:  23 Q. Do you know if it was a feeling that --  24 well, let me ask you this way.  25 Did you ever talk about that feeling that</p>	<p>Page 219</p> <p>1 MR. CRITTON: Form.  2 THE WITNESS: The only reason I contacted  3 the attorneys was to see what's my position  4 because I didn't have money to go to an  5 attorney myself.  6 BY MR. EDWARDS:  7 Q. Why would you feel like you may need an  8 attorney though if you didn't do anything wrong?  9 A. I didn't need an attorney.  10 Q. You were just frightened by the process?  11 A. The process and the people who was  12 involved in this.  13 Q. The people involved meaning Ghislaine  14 Maxwell and Jeffrey Epstein?  15 MR. CRITTON: Form.  16 BY MR. EDWARDS:  17 Q. I'll ask you, which people are you  18 talking about?  19 A. Ghislaine Maxwell.  20 Q. And were you still frightened because of  21 the threat that she --  22 A. I don't think so now, you know, I'm  23 protected because I'm doing this publicly.  24 Q. Okay. Well, going back to my other  25 question about why didn't you reveal to Mr.</p>

<p>Page 222</p> <p>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</p>	<p>Page 224</p> <p>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</p>
<p>Page 223</p> <p>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</p>	<p>Page 225</p> <p>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.</p>

<p>1 BY MR. EDWARDS:</p> <p>2 Q. He also said he would wipe down the 3 vibrators and sex toys and put them away in the 4 armoire.</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: These things have a tip, 7 they have the cream, they have all kinds of 8 cream for giving massage.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. How many of these massagers or vibrators 11 would you wipe down?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: This big one all the time.</p> <p>14 BY MR. EDWARDS:</p> <p>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?</p> <p>18 A. No.</p> <p>19 MR. CRITTON: Form.</p> <p>20 BY MR. EDWARDS:</p> <p>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?</p>	<p>Page 226</p> <p>1 underwear she brought it to the laundry and we 2 used to label it.</p> <p>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?</p> <p>8 A. No, she didn't show me, she said I 9 cleaned this and I put it away, it was a vibrator.</p> <p>10 Q. Did she describe the vibrator for you so 11 that you knew which one she was talking about?</p> <p>12 A. The vibrator that a female would use for 13 personal use.</p> <p>14 Q. Not the same long one that you've been 15 describing?</p> <p>16 A. No.</p> <p>17 Q. One that is a penis shaped vibrator.</p> <p>18 MR. CRITTON: Form.</p> <p>19 THE WITNESS: Yes.</p> <p>20 BY MR. EDWARDS:</p> <p>21 Q. That's what she was talking about?</p> <p>22 A. Yes.</p> <p>23 Q. And did she tell you on how many 24 occasions after these --</p> <p>25 A. Several times.</p>
<p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: Louella told me I did this, 3 I did that.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. So tell us what did Louella tell you?</p> <p>6 A. She find toys on the floors, she have to 7 clean them.</p> <p>8 Q. Did she tell you when she found the toys 9 on the floor?</p> <p>10 A. After his massages, you know.</p> <p>11 Q. With the young girls that we're talking 12 about?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And when did Louella tell you 15 that?</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Page 227</p> <p>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?</p> <p>8 MR. CRITTON: Form.</p> <p>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.</p> <p>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.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. And what did she say about liking or 23 disliking the fact that she had to clean these 24 vibrators?</p> <p>25 A. She didn't like to clean those.</p>

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

<p>1 MR. CRITTON: Form.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. And so you never inquired of them as to</p> <p>4 what was going on behind closed doors?</p> <p>5 A. Never.</p> <p>6 Q. Other than A. did you take any of the</p> <p>7 other girls to or from -- and the girls I'm</p> <p>8 talking about are these young girls that are</p> <p>9 roughly the same age as C. and T. that you</p> <p>10 labelled masseuses.</p> <p>11 Did you take any of them to or from their</p> <p>12 homes on any occasion?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: Probably a couple of times.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q. Do you remember if you ever took C. or T.</p> <p>17 to or from their homes?</p> <p>18 A. I don't remember but if it was somewhere</p> <p>19 in West Palm Beach or Royal Palm Beach, probably,</p> <p>20 yes.</p> <p>21 Q. All right. And the homes you would take</p> <p>22 these girls to, can you describe the neighborhood?</p> <p>23 A. They were blue collar neighborhoods.</p> <p>24 Q. Much different than Mr. Epstein?</p> <p>25 MR. CRITTON: Form.</p>	<p>Page 234</p> <p>1 Epstein.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. Okay. But this is talking about a</p> <p>4 situation where girls come to the house, and these</p> <p>5 young girls come to the house and Mr. Epstein is</p> <p>6 not at the house at all. That happened?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: Well, they left and --</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. Wait. Who are you talking about?</p> <p>11 A. Mr. Epstein, the girls, and Sarah, they</p> <p>12 go away.</p> <p>13 Q. You're talking about a different set of</p> <p>14 girls now, now you're talking about the girls that</p> <p>15 fly with him on the airplane.</p> <p>16 A. Exactly. But they're out of the house.</p> <p>17 But Sarah will call me and leave me instructions</p> <p>18 on my phone that I have to pay so and so and they</p> <p>19 will be there this evening or this afternoon,</p> <p>20 that's why there was nobody in the house but I</p> <p>21 still have to pay them.</p> <p>22 Q. Okay. Would these girls usually arrive</p> <p>23 by taxicab and you would have to pay them?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: Sometimes taxi and</p>
<p>1 THE WITNESS: Very different.</p> <p>2 MR. CRITTON: Argumentative.</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. Did any of the girls ever talk to you in</p> <p>5 the car about anybody else that they ever gave a</p> <p>6 massage to?</p> <p>7 A. No, they were very private.</p> <p>8 Q. Rodriguez referred to himself as a human</p> <p>9 ATM machine and was ordered by Epstein to maintain</p> <p>10 a minimum balance of \$2,000 on him at all times.</p> <p>11 That's something you've told us already.</p> <p>12 Right?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: Yeah.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q. When a girl would come by the house and</p> <p>17 Mr. Epstein was either not in the residence or was</p> <p>18 not at home at the time Rodriguez was to provide</p> <p>19 the girl, in parenthesis, masseuse, several</p> <p>20 hundred dollars for their time and to notify</p> <p>21 Epstein the amount they were given.</p> <p>22 MR. CRITTON: Form.</p> <p>23 THE WITNESS: Well, I have to give this</p> <p>24 report to the comptroller in New York to</p> <p>25 keep track of the cash. I never talk to Mr.</p>	<p>Page 235</p> <p>1 sometimes their own cars.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. And you mentioned that you would</p> <p>4 sometimes be the person to call them a cab.</p> <p>5 Right?</p> <p>6 A. Yes.</p> <p>7 Q. How did you know which cab service to</p> <p>8 use?</p> <p>9 A. We used to have in the house two or three</p> <p>10 numbers and people knew the house because</p> <p>11 sometimes it was hard to -- it was easy to get</p> <p>12 lost to get to the house.</p> <p>13 Q. So were there certain taxicab drivers</p> <p>14 that you would ask to come specifically?</p> <p>15 A. Yes.</p> <p>16 Q. Who?</p> <p>17 A. I don't remember, but they knew the house</p> <p>18 right away, it's like Joe, come here, I need you.</p> <p>19 Q. Would you have that name of that person</p> <p>20 that would typically drive these girls, you know,</p> <p>21 in taxicabs to and from the house anywhere?</p> <p>22 MR. CRITTON: Form.</p> <p>23 THE WITNESS: I don't think so.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Do you remember whether it was Yellow Cab</p>

<p>1 Cab Company?</p> <p>2 A. West Palm Beach Taxi. No, it's not</p> <p>3 Yellow. Could be Yellow, but I don't know.</p> <p>4 Q. Would Mr. Epstein have the names or the</p> <p>5 list?</p> <p>6 A. Probably.</p> <p>7 MR. CRITTON: Form.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Anybody else?</p> <p>10 A. Sarah.</p> <p>11 Q. Sarah would have?</p> <p>12 A. Yes.</p> <p>13 Q. In addition to Mr. Epstein obviously</p> <p>14 knowing who's coming to and from the house, would</p> <p>15 Sarah also be familiar with the names of the girls</p> <p>16 and who they were?</p> <p>17 A. Yes.</p> <p>18 Q. In addition to Sarah and Mr. Epstein</p> <p>19 would Ghislaine Maxwell be familiar with the names</p> <p>20 of some of these girls?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. Are these names kept in a database in a</p> <p>25 computer system?</p>	<p>Page 238</p> <p>1 A. Nadia was the number one girlfriend for</p> <p>2 Mr. Epstein. Very sweet girl, and she was always</p> <p>3 -- she would come over to the house but different</p> <p>4 girls with her all the time.</p> <p>5 Q. Okay. But Nadia, that's somebody who</p> <p>6 lives in New York?</p> <p>7 A. Nadia, I believe, yes, her address is in</p> <p>8 New York.</p> <p>9 Q. So how often would she stay at 358 El</p> <p>10 Brillo?</p> <p>11 A. Very often.</p> <p>12 Q. Usually every time when Mr. Epstein was</p> <p>13 there?</p> <p>14 A. Yes.</p> <p>15 Q. And she would for the most time fly on</p> <p>16 the plane with Mr. Epstein?</p> <p>17 A. Yes.</p> <p>18 Q. And it would be her and Mr. Epstein and</p> <p>19 oftentimes some other girls?</p> <p>20 A. Exactly.</p> <p>21 Q. Where some points I think earlier when</p> <p>22 Mr. Mermelstein was asking you questions where</p> <p>23 there was some confusion was we're talking about</p> <p>24 two different sets of girls, the girls that would</p> <p>25 come over and be labelled masseuses from the Palm</p>
<p>1 A. Could be.</p> <p>2 MR. CRITTON: I'm sorry, did you say</p> <p>3 could be?</p> <p>4 THE WITNESS: Yeah.</p> <p>5 MR. CRITTON: Move to strike as</p> <p>6 speculation.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. When you say could be, why do you say</p> <p>9 that?</p> <p>10 A. Because there were too many and they were</p> <p>11 very organized and there is nothing you write on a</p> <p>12 piece of paper.</p> <p>13 Q. When you say they were very organized,</p> <p>14 are we talking --</p> <p>15 A. Mr. Epstein and Sarah.</p> <p>16 Q. Anybody else beside Mr. Epstein and</p> <p>17 Sarah, I guess beside Sarah that would do the</p> <p>18 scheduling to coordinate the times these girls</p> <p>19 would come to the house?</p> <p>20 A. I'm sorry, anybody else you say?</p> <p>21 Q. Right, aside from Sarah.</p> <p>22 A. No, no.</p> <p>23 Q. And do you know what role, if any, Nadia</p> <p>24 Marcenacova ever played in any of what would go on</p> <p>25 behind the bedroom door with Mr. Epstein?</p>	<p>Page 239</p> <p>1 Beach area, and the girls that would fly on the</p> <p>2 plane with Mr. Epstein and Ms. Marcenacova.</p> <p>3 So, what I'm asking you is what, if any,</p> <p>4 involvement did Nadia Marcenacova have with the</p> <p>5 girls that would arrive and be labeled as</p> <p>6 masseuses behind closed doors with Mr. Epstein?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: He was the second -- the</p> <p>9 first role was Sarah and she was always --</p> <p>10 Nadia is a very shy person so she will be in</p> <p>11 the background.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. Did you ever know of Nadia Marcenacova to</p> <p>14 engage in -- to be in the room with Mr. Epstein</p> <p>15 while any of these young girls were up there?</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: Yeah.</p> <p>18 BY MR. EPSTEIN:</p> <p>19 Q. How often do you remember Nadia and Mr.</p> <p>20 Epstein being in the room with any of these young</p> <p>21 girls?</p> <p>22 A. I would say most of the time.</p> <p>23 Q. Nadia would go up there too?</p> <p>24 A. Yeah.</p> <p>25 Q. Did you ever believe that Nadia was</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>Page 242</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>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>Page 243</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>

<p>1 Epstein. Right?</p> <p>2 A. Yes.</p> <p>3 Q. And the first thing that I wrote was that</p> <p>4 two investigators met you for a couple of hours at</p> <p>5 Don Shula's. Is that right?</p> <p>6 A. Yes.</p> <p>7 Q. How did that whole meeting come together,</p> <p>8 did they call you?</p> <p>9 A. Well, they came to my house and then we</p> <p>10 agreed for a more detailed meeting, and halfway</p> <p>11 through -- I was in the area something he said I</p> <p>12 can meet you there, so he suggest Don Shula Hotel.</p> <p>13 Q. How long did you talk with them at your</p> <p>14 house?</p> <p>15 A. Probably an hour or two.</p> <p>16 Q. So there was an hour or two at your</p> <p>17 house?</p> <p>18 A. Yes.</p> <p>19 Q. And then they decided you weren't</p> <p>20 finished talking with them yet and they talked</p> <p>21 with you two more hours at Don Shula's?</p> <p>22 A. Yes.</p> <p>23 Q. So you spent up to four hours with these</p> <p>24 investigators for Mr. Epstein?</p> <p>25 MR. CRITTON: Form.</p>	<p>Page 246</p> <p>1 Right?</p> <p>2 A. Yeah, exactly, we talked before, yes.</p> <p>3 Q. So this is before the subpoena --</p> <p>4 A. Yes, yes.</p> <p>5 Q. And you called him and said the FBI is</p> <p>6 wanting to talk to me, what should I do?</p> <p>7 A. Yeah. He told me, you know, tell them</p> <p>8 the truth. And so actually he didn't call me back</p> <p>9 but he know the FBI sat down with me in the</p> <p>10 morning in Green's Pharmacy in Palm Beach.</p> <p>11 Q. Where?</p> <p>12 A. In Green's Pharmacy, it's in front of the</p> <p>13 church.</p> <p>14 Q. How long did you talk to the FBI?</p> <p>15 A. From 8 to 12, more or less.</p> <p>16 Q. So another four hour talk?</p> <p>17 A. More or less, yes. It was the same thing</p> <p>18 as the Palm Beach Police Department but they told</p> <p>19 me this is a new investigation because the same</p> <p>20 questions that Palm Beach Police Department ask me</p> <p>21 they start with the same thing, what was going on,</p> <p>22 this and that, and so -- but in a different -- in</p> <p>23 a different character they ask me the same</p> <p>24 questions but they went on and on and on.</p> <p>25 Q. Okay. When did you have your sit down</p>
<p>1 THE WITNESS: Yes.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. And I know that you told us a couple of</p> <p>4 things, they wanted to know what you knew, but did</p> <p>5 they suggest a way for you to testify to help Mr.</p> <p>6 Epstein?</p> <p>7 MR. CRITTON: Form, asked and answered.</p> <p>8 THE WITNESS: The way the meeting went is</p> <p>9 he took notes and asked me questions how do</p> <p>10 you know, he asked me about -- it's like I'm</p> <p>11 going to a job, what do you know about this,</p> <p>12 running this, who is this person, so it was</p> <p>13 like questions and answers, questions and</p> <p>14 answers.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q. Okay.</p> <p>17 A. And that was it, you know, but mostly the</p> <p>18 questions from their side.</p> <p>19 Q. Okay. And then the next contact that you</p> <p>20 had was with Jack Goldberger?</p> <p>21 A. Yeah.</p> <p>22 Q. And you called Jack Goldberger --</p> <p>23 A. Yeah, because the subpoena.</p> <p>24 Q. Okay. Well, the first time you call Jack</p> <p>25 Goldberger had something to do with the FBI.</p>	<p>Page 247</p> <p>1 meeting with Mr. Critton?</p> <p>2 A. In his office.</p> <p>3 Q. When?</p> <p>4 A. Oh when? Last week.</p> <p>5 Q. Last week?</p> <p>6 A. Or I believe two weeks ago, something</p> <p>7 like that, before this.</p> <p>8 Q. So you received the subpoena for your</p> <p>9 deposition that was scheduled for last week --</p> <p>10 A. Exactly.</p> <p>11 Q. -- but you had car problems. And you</p> <p>12 called Jack Goldberger again?</p> <p>13 A. Yeah. And he told me he was out of town,</p> <p>14 and then one guy came to my house -- actually, one</p> <p>15 of the securities from Epstein.</p> <p>16 Q. A security guard for Epstein?</p> <p>17 A. No, security expert.</p> <p>18 Q. So an investigator?</p> <p>19 A. An investigator, sorry. And he said get</p> <p>20 in touch with Mr. Critton.</p> <p>21 Q. Do you remember who that is?</p> <p>22 A. I have his card at home.</p> <p>23 Q. Do you remember what the card looks like?</p> <p>24 A. It's a yellow card, security or</p> <p>25 investigation or something.</p>

<p style="text-align: right;">Page 250</p> <p>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</p>	<p style="text-align: right;">Page 252</p> <p>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.</p>
<p style="text-align: right;">Page 251</p> <p>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?</p>	<p style="text-align: right;">Page 253</p> <p>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.</p>

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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 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 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 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

<p style="text-align: right;">Page 258</p> <p>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.</p>	<p style="text-align: right;">Page 260</p> <p>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?</p>
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<p style="text-align: right;">Page 259</p> <p>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</p>	<p style="text-align: right;">Page 261</p> <p>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</p>
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<p>1 under the influence of alcohol?</p> <p>2 A. No, I don't know.</p> <p>3 Q. When Mr. Epstein's investigators first</p> <p>4 contacted you, did you want to speak with them?</p> <p>5 A. If I wanted to talk to the investigators?</p> <p>6 Q. Did you want to speak with them?</p> <p>7 A. Yes, because I was concerned if I was in</p> <p>8 trouble with Mr. Epstein or I was in trouble with</p> <p>9 anything.</p> <p>10 Q. In December 2005, early January 2006 when</p> <p>11 you cooperated with the police, how come you</p> <p>12 cooperated with the police?</p> <p>13 A. They give me an introduction of what was</p> <p>14 going on, and the investigation, at that time</p> <p>15 nobody knew, the press, nobody, and they told me</p> <p>16 they needed my cooperation and I -- they asked me</p> <p>17 we like to know your honest answers, and that's</p> <p>18 what I did.</p> <p>19 Q. How did you feel about cooperating?</p> <p>20 A. I feel good.</p> <p>21 Q. You stated --</p> <p>22 A. Sorry, go ahead.</p> <p>23 Q. Did you have anything else to add?</p> <p>24 A. No, I hope, I thought I did the right</p> <p>25 thing.</p>	Page 262	<p>1 Q. Where was that inventory?</p> <p>2 A. It was kept in an armoire in the master</p> <p>3 bedroom -- master bath.</p> <p>4 Q. Was that massager that was always found</p> <p>5 after these massages kept in the same armoire with</p> <p>6 the sex toys?</p> <p>7 A. No, it's a different armoire, different</p> <p>8 furniture.</p> <p>9 Q. Were any other massagers kept in that</p> <p>10 armoire?</p> <p>11 A. Yes.</p> <p>12 Q. Can you describe them?</p> <p>13 A. Two, two big ones, the two rubber tips,</p> <p>14 they were kept in the bathroom.</p> <p>15 Q. And where was this armoire in relation to</p> <p>16 the one that held the sex toys?</p> <p>17 A. The one with the sex toys was in his</p> <p>18 bedroom in front of his table, in front of his</p> <p>19 bed, and the other ones were inside the bathroom.</p> <p>20 Q. Did you ever cleanup female clothes after</p> <p>21 a massage?</p> <p>22 A. No.</p> <p>23 Q. Did you ever cleanup any towels after a</p> <p>24 massage?</p> <p>25 A. No.</p>	Page 264
<p>1 Q. You stated that you picked up I guess</p> <p>2 some of the oils and creams that were left over</p> <p>3 after the massage.</p> <p>4 A. Yes.</p> <p>5 Q. Do you remember the names of any of those</p> <p>6 products?</p> <p>7 A. Names of those products. Spa is one of</p> <p>8 them, like the place spa.</p> <p>9 Q. Any other names?</p> <p>10 A. And it's a big tube like this, no, I</p> <p>11 don't remember right now.</p> <p>12 Q. Do you know if any of those massages or</p> <p>13 oils had any kind of a sexual connotation to the</p> <p>14 name or the product?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MR. LANGINO:</p> <p>18 Q. Do you know if any masseuse that came to</p> <p>19 Epstein's home ever provided massage to someone</p> <p>20 else besides Mr. Epstein?</p> <p>21 A. No, I don't know.</p> <p>22 Q. Before you talked about a massager that</p> <p>23 was always present after a massage and you stated</p> <p>24 that you placed that massager back into inventory.</p> <p>25 A. Yes.</p>	Page 263	<p>1 Q. Did you ever inspect any blood on any</p> <p>2 type of item in the massage room after a massage?</p> <p>3 A. No.</p> <p>4 Q. I know we spoke about pictures, do you</p> <p>5 know if Mr. Epstein kept any videotapes of any of</p> <p>6 these massages?</p> <p>7 A. No.</p> <p>8 Q. Do you know if he has any videotape of</p> <p>9 any of these masseuses?</p> <p>10 A. No, I don't know.</p> <p>11 Q. Do you hold any significant feeling</p> <p>12 regarding Mr. Epstein finishing his jail sentence</p> <p>13 now that he's free?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: If he was sentenced for</p> <p>16 solicitation of prostitution and he did</p> <p>17 leave before that, you know, I think it's</p> <p>18 not -- I don't think he has been doing what</p> <p>19 he was supposed to do, you know, the full</p> <p>20 18 months, and to be monitored after that</p> <p>21 and what have you. But I don't think --</p> <p>22 answering your question, I don't think it's</p> <p>23 been done justice.</p> <p>24 MR. CRITTON: Let me move to strike as</p> <p>25 irrelevant to anything.</p>	Page 265

<p>1 BY MR. LANGINO:</p> <p>2 Q. Are you currently in fear of Mr. Epstein?</p> <p>3 A. Not at this particular moment but it's</p> <p>4 something I have to be worry about, yes.</p> <p>5 Q. Are you personally afraid of criminal</p> <p>6 prosecution?</p> <p>7 A. No.</p> <p>8 Q. Do you believe that you did anything</p> <p>9 illegal?</p> <p>10 A. Illegal, no.</p> <p>11 MR. LANGINO: I have no further</p> <p>12 questions. Thank you.</p> <p>13 MR. CRITTON: We're going to break in</p> <p>14 about 15 minutes. Do you want to start and</p> <p>15 go for 15 minutes or do you want to -- it's</p> <p>16 up to you.</p> <p>17 MS. EZELL: I'll start.</p> <p>18 MR. WILLITS: When are we going to quit,</p> <p>19 folks?</p> <p>20 MR. CRITTON: In 15 minutes.</p> <p>21 THE VIDEOGRAPHER: Might as well change</p> <p>22 tapes.</p> <p>23 MR. EDWARDS: Bob has to get back so</p> <p>24 we've agreed we're going to come back some</p> <p>25 other time.</p>	<p>Page 266</p> <p>1 THE STATE OF FLORIDA, )</p> <p>2 COUNTY OF DADE. )</p> <p>3</p> <p>4</p> <p>5 I, the undersigned authority, certify</p> <p>6 that ALFREDO RODRIGUEZ personally appeared before</p> <p>7 me on the 29th day of July, 2009 and was duly</p> <p>8 sworn.</p> <p>9</p> <p>10 WITNESS my hand and official seal this</p> <p>11 31st day of July, 2009.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <hr/> <p>16 MICHELLE PAYNE, Court Reporter</p> <p>17 Notary Public - State of Florida</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>1</p> <p>2 MR. WILLITS: Why don't we just stop now?</p> <p>3 MS. EZELL: Okay.</p> <p>4 MR. EDWARDS: Rather than you start.</p> <p>5 MS. EZELL: Yeah, I won't get very far.</p> <p>6 MR. EDWARDS: Sorry to do this with you,</p> <p>7 we didn't finish.</p> <p>8 MR. CRITTON: So we're stopped?</p> <p>9 MR. EDWARDS: We're stopped.</p> <p>10 THE VIDEOGRAPHER: Off the record.</p> <p>11 (Thereupon, the videotaped deposition was</p> <p>12 adjourned at 5:30 p.m.)</p> <p>13 - - -</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>Page 267</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</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>Page 269</p> <p>1 CERTIFICATE</p> <p>2 The State Of Florida, )</p> <p>3 County Of Dade. )</p> <p>4</p> <p>5 I, MICHELLE PAYNE, Court Reporter and</p> <p>6 Notary Public in and for the State of Florida at</p> <p>7 large, do hereby certify that I was authorized to</p> <p>8 and did stenographically report the videotaped</p> <p>9 deposition of ALFREDO RODRIGUEZ; that a review of</p> <p>10 the transcript was requested; and that the</p> <p>11 foregoing pages, numbered from 1 to 269,</p> <p>12 inclusive, are a true and correct transcription of</p> <p>13 my stenographic notes of said deposition.</p> <p>14 I further certify that said videotaped</p> <p>15 deposition was taken at the time and place</p> <p>16 hereinabove set forth and that the taking of said</p> <p>17 videotaped deposition was commenced and completed</p> <p>18 as hereinabove set out.</p> <p>19 I further certify that I am not an</p> <p>20 attorney or counsel of any of the parties, nor am</p> <p>21 I a relative or employee of any attorney or</p> <p>22 counsel of party connected with the action, nor am</p> <p>23 I financially interested in the action.</p> <p>24 The foregoing certification of this</p> <p>25 transcript does not apply to any reproduction of</p> <p>the same by any means unless under the direct</p> <p>control and/or direction of the certifying</p> <p>reporter.</p> <p>DATED this 31st day of July, 2009.</p> <hr/> <p>MICHELLE PAYNE, Court Reporter</p>