

# EXHIBIT 18

Page 1

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

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:  
08-80232, 08-80380, 98-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF JUAN ALESSI  
VOLUME I

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

2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33401

Reported By:  
Sandra W. Townsend, FPR  
Notary Public, State of Florida  
PROSE COURT REPORTING AGENCY  
West Palm Beach Office

Page 3

On behalf of the Defendant:  
ROBERT J. CRITTON, ESQUIRE  
BURMAN, CRITTON & LUTTIER  
515 North Flagler Drive, Suite 400  
West Palm Beach, Florida 33401  
Phone: 561.842.2820  
rcrit@bclclaw.com  
mpike@bclclaw.com

Page 2

APPEARANCES:  
On behalf of the Plaintiffs:  
RICHARD WILLITS, ESQUIRE  
RICHARD H. WILLITS, P.A.  
2290 10th Avenue North, Suite 404  
Lake Worth, Florida 33461  
Phone: 561.582.7600  
reelrh@hotmail.com

STUART MERMELSTEIN, ESQUIRE  
MERMELSTEIN & HOROWITZ, P.A.  
18205 Biscayne Boulevard, Suite 2218  
Miami, Florida 33160  
Phone: 305.931.2200  
ssm@sexabuseattorney.com  
ahorowitz@sexabuseattorney.com

WILLIAM J. BERGER, ESQUIRE  
ROTHSTEIN ROSENFELDT ADLER  
401 East Las Olas Boulevard, Suite 1650  
Fort Lauderdale, Florida 33301  
Phone: 954.522.3456  
bedwards@rra-law.com

KATHERINE W. EZELL, ESQUIRE  
PODHURST ORSECK, P.A.  
25 West Flagler Street, Suite 800  
Miami, Florida 33130  
Phone: 305.358.2800  
rjosefsberg@podhurst.com  
kezell@podhurst.com

ADAM J. LANGINO, ESQUIRE  
LEOPOLD KUVIN  
2925 PGA Boulevard, Suite 200  
Palm Beach Gardens, Florida 33410  
Phone: 561.515.1400  
skuv@leopoldkuvin.com

Page 4

EXHIBITS

NUMBER	DESCRIPTION	PAGE
Exhibit number 1	Photographs	45
Exhibit number 2	Transcript	130
Exhibit number 3	Incident Report	137
Exhibit number 4	Incorporation Papers	149
Exhibit number 5	Incorporation Papers	150

1 (Pages 1 to 4)

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

Page 5	Page 7
<p>1 PROCEEDINGS</p> <p>2 - - -</p> <p>3 Deposition taken before Sandra W. Townsend, Court</p> <p>4 Reporter and Notary Public in and for the State of</p> <p>5 Florida at Large, in the above cause.</p> <p>6 - - -</p> <p>7 VIDEOGRAPHER: Today is September 8, 2009.</p> <p>8 The time is 12 minutes after 10:00 in the morning.</p> <p>9 This is the videotaped deposition of Juan</p> <p>10 Alessi in the matter of Jane Doe number two versus</p> <p>11 Jeffrey Epstein. This deposition is being held at</p> <p>12 2139 Palm Beach Lakes Boulevard in West Palm Beach,</p> <p>13 Florida.</p> <p>14 My name is Stan Sanders. I'm the videographer</p> <p>15 representing Visual Evidence, Incorporated.</p> <p>16 Would the attorneys please announce their</p> <p>17 appearances for the record.</p> <p>18 MR. WILLITS: Richard Willits, representing</p> <p>19 Carolyn Andriano.</p> <p>20 MR. BERGER: William J. Berger, representing</p> <p>21 E.W., L.M. and Jane Doe number two.</p> <p>22 MR. MERMELSTEIN: Stuart Mermelstein of</p> <p>23 Mermelstein and Horowitz, representing Jane Does</p> <p>24 numbers two through eight.</p> <p>25 MR. LANGINO: Adam Langino, on behalf of B.B.</p>	<p>1 Boynton Beach, Florida, 33472.</p> <p>2 Q. All right, sir. Did you ever work for Jeffrey</p> <p>3 Epstein?</p> <p>4 A. Yes, I did.</p> <p>5 Q. In what capacity?</p> <p>6 A. Everything. I started with Jeffrey Epstein</p> <p>7 around 19 -- please bear with the dates because I</p> <p>8 trying --</p> <p>9 Q. Sure.</p> <p>10 A. -- to remember. 1969 as a part-time</p> <p>11 maintenance guy.</p> <p>12 And then I become a full-time employee, I</p> <p>13 think it was January 1, 2 -- '91, '92, so '92. Sorry.</p> <p>14 Q. You said you started in 1969? That would</p> <p>15 be --</p> <p>16 A. No. No. No. No. No.</p> <p>17 Q. Okay.</p> <p>18 A. '99.</p> <p>19 Q. 1999?</p> <p>20 A. Yeah.</p> <p>21 Q. All right. And how did you happen to get that</p> <p>22 job? Was it through an employment agency --</p> <p>23 A. No.</p> <p>24 Q. -- or an ad in the paper?</p> <p>25 A. I had a company at that time used to take care</p>
Page 6	Page 8
<p>1 MS. EZELL: Katherine Ezell from Podhurst</p> <p>2 Orseck, on behalf of Jane Does 101 and 102.</p> <p>3 MR. CRITTON: Bob Critton, on behalf of</p> <p>4 Jeffrey Epstein.</p> <p>5 THEREUPON,</p> <p>6 JUAN ALESSI,</p> <p>7 having been first duly sworn or affirmed, was examined</p> <p>8 and testified as follows:</p> <p>9 THE WITNESS: I do.</p> <p>10 DIRECT EXAMINATION</p> <p>11 BY MR. WILLITS:</p> <p>12 Q. Good morning, sir.</p> <p>13 A. Good morning.</p> <p>14 Q. I introduced myself through the videographer.</p> <p>15 My name is Richard Willits.</p> <p>16 A. Okay.</p> <p>17 Q. I represent a young lady by the name of</p> <p>18 Carolyn Andriano.</p> <p>19 A. Okay.</p> <p>20 Q. Is that name familiar to you at all?</p> <p>21 A. Whose name?</p> <p>22 Q. Carolyn Andriano. Do you recognize that name?</p> <p>23 A. No.</p> <p>24 Q. What is your residence address, sir?</p> <p>25 A. My address is 6791 Fairway Lakes Drive,</p>	<p>1 of a lot of residents in Palm Beach. And I got to know</p> <p>2 Jeffrey through Lesley Wexner. And I used to work in</p> <p>3 about 20 different, 20, 25 different homes in Palm Beach</p> <p>4 as a maintenance guy.</p> <p>5 Q. Okay.</p> <p>6 A. And I have basically my own company and I do</p> <p>7 repairs for them. I did home sit in for them.</p> <p>8 Q. And what was -- did you work for Jeffrey</p> <p>9 Epstein? What was your position when you started?</p> <p>10 A. When I started, he hire me to -- he just</p> <p>11 bought the house.</p> <p>12 Q. I'm sorry?</p> <p>13 A. He just had bought the house --</p> <p>14 Q. Okay.</p> <p>15 A. -- where he live on El Brillo. And he hire me</p> <p>16 through Mr. Wexner's references to do repair works. And</p> <p>17 basically what I did the most was taking walls apart,</p> <p>18 windows and stuff that he didn't want to have it, --</p> <p>19 Q. I see.</p> <p>20 A. -- fix it.</p> <p>21 Q. And when you started working for Mr. Epstein,</p> <p>22 were you still working for other people in Palm Beach?</p> <p>23 A. Yes, I did.</p> <p>24 Q. Okay. And about how long a period of time did</p> <p>25 you do this type of work for Mr. Epstein, the</p>

2 (Pages 5 to 8)

Page 9	Page 11
<p>1 maintenance and taking out walls?</p> <p>2 A. It was couple months. It was couple months</p> <p>3 before.</p> <p>4 Q. And what was the name of your company?</p> <p>5 A. Alessi Maintenance.</p> <p>6 Q. And how were you paid?</p> <p>7 A. By him?</p> <p>8 Q. Yes.</p> <p>9 A. Usually by check or cash sometimes.</p> <p>10 Q. Do you know what company actually paid your</p> <p>11 company?</p> <p>12 A. It was Jeffrey Epstein and Company.</p> <p>13 Q. So you said you had that position for a couple</p> <p>14 of months.</p> <p>15 What happened next?</p> <p>16 A. Then Mr. Epstein asked me to, if I wanted to</p> <p>17 be his employee, because I was going from one house to</p> <p>18 another house to another house, one hour here. I was</p> <p>19 just running around Palm Beach all day.</p> <p>20 So he asked me if I would just work for him,</p> <p>21 exclusively for him.</p> <p>22 Q. Okay.</p> <p>23 A. And we agreed with the terms and I become a</p> <p>24 full-time employee as a maintenance guy. And I was</p> <p>25 taking care of everything, as far as maintenance.</p>	<p>1 about seven months before -- after I become a full-time</p> <p>2 employee.</p> <p>3 Q. Okay. And how did Ms. Maxwell come into the</p> <p>4 picture?</p> <p>5 A. It was his girlfriend, his main girlfriend.</p> <p>6 Q. Okay. Had you known her before she became --</p> <p>7 A. No.</p> <p>8 Q. -- your --</p> <p>9 A. Never know her before.</p> <p>10 Q. I'm sorry. I didn't get a chance to finish my</p> <p>11 question.</p> <p>12 Would you have referred to her as your</p> <p>13 supervisor or your superior or what would you have</p> <p>14 called Mrs. Maxwell?</p> <p>15 A. I used to call her Ghislaine.</p> <p>16 Q. Okay. And how was it explained to you that</p> <p>17 you were now to deal with Ms. Maxwell, as opposed to</p> <p>18 Jeffrey Epstein?</p> <p>19 A. She would tell me, I am going to take care of</p> <p>20 the house.</p> <p>21 Q. Okay. That was explained to you by</p> <p>22 Ms. Maxwell?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Is that a yes?</p> <p>25 A. Yes.</p>
Page 10	Page 12
<p>1 Then my job changed little by little to house</p> <p>2 man, estate manager, and then to a majordomo.</p> <p>3 Q. Okay. When you first agreed to terms with</p> <p>4 Mr. Epstein and you first started working for him full</p> <p>5 time, what were those terms, do you remember?</p> <p>6 A. The terms is basically was how much -- he</p> <p>7 asked me how much I was making in all the properties.</p> <p>8 And I says, well, I make this -- this amount</p> <p>9 of money.</p> <p>10 And he says, fine.</p> <p>11 Q. And how much was that, did he pay you?</p> <p>12 A. Around \$45,000. I think I started with 45.</p> <p>13 Q. Okay. And when you started to work for him as</p> <p>14 a full-time employee, did you have anybody that you</p> <p>15 reported to or did you deal directly with Mr. Epstein?</p> <p>16 A. At the beginning with Mr. Epstein, directly to</p> <p>17 him.</p> <p>18 Q. Did that change?</p> <p>19 A. Later on, yes.</p> <p>20 Q. And how did that change?</p> <p>21 A. When Ms. Maxwell, Ghislaine Maxwell came to</p> <p>22 the picture.</p> <p>23 Q. Okay. About when was it that she came into</p> <p>24 the picture?</p> <p>25 A. Exactly date, I cannot remember. But it was</p>	<p>1 Q. And when Ms. Maxwell started assuming</p> <p>2 responsibility for the house, did your duties change at</p> <p>3 that time?</p> <p>4 A. Not much.</p> <p>5 Q. Okay.</p> <p>6 A. Not much.</p> <p>7 Q. And at that time when Ms. Maxwell started</p> <p>8 taking responsibility for the house, what were your</p> <p>9 duties?</p> <p>10 A. Basically I was still doing the maintenance</p> <p>11 work.</p> <p>12 Q. Okay.</p> <p>13 A. Was doing -- they were trying to remodel the</p> <p>14 home and they would told me, okay, tear down this wall.</p> <p>15 We want to see how it's going to look. Or put this</p> <p>16 windows and tear down -- we had a fishing tank. We took</p> <p>17 it out -- I took it out. A kitchen on the second floor.</p> <p>18 I took it out. So it was basically dismantling the</p> <p>19 house.</p> <p>20 Q. Okay. And about how long a period of time did</p> <p>21 that project last?</p> <p>22 A. I would says, six to seven months.</p> <p>23 Q. Okay. And after the remodeling slacked off or</p> <p>24 stopped, did your duties then change?</p> <p>25 A. Yeah. Increasingly they change.</p>

3 (Pages 9 to 12)

Page 45	Page 47
<p>1 MS. EZELL: I'm going to ask -- I don't know 2 whether you've still been serially designating 3 Exhibits or whether we're doing them separately for 4 deposition. 5 MR. CRITTON: I think we cannot trust that 6 people will do them serially. I'd do them with 7 each one. 8 MS. EZELL: Then would you mark this, please, 9 as Exhibit 1 to this deposition. 10 And I'm just going to state on the record that 11 I will keep that original. We will not attach it 12 to the deposition. 13 (Exhibit number 1 was marked for 14 identification purposes and retained by Counsel for the 15 Plaintiffs.) 16 THE WITNESS: Yes, that's -- 17 BY MS. EZELL: 18 Q. Can you identify that -- the young woman in 19 those pictures? 20 A. Yes. 21 Q. Who is it? 22 A. That's V. -- V. Now that you says R., that 23 is V.R. definite, a hundred percent. 24 MR. CRITTON: Let me just note my objection, 25 as I did in A. Rod's deposition or Mr. Rodriguez's</p>	<p>1 THE WITNESS: Could have been. But, you know, 2 I am not -- I don't think I am a very good judge of 3 ages. If you ask me how old you are, I really 4 couldn't tell you. 5 MR. CRITTON: Kathy thinks she's 25. 6 MS. EZELL: In my dreams. 7 THE WITNESS: Now, again, I must tell you, I 8 was never told to check any i.d.s on any of the 9 people who work at the house. 10 BY MS. EZELL: 11 Q. I understand that. And, so, I think I'm just 12 trying to establish that you didn't consider it part of 13 your job description to worry about or consider the 14 ages -- 15 A. No. 16 Q. -- of the young women that came there? 17 A. Absolutely not. Absolutely not. 18 Q. And, so, you never really focused on that or 19 particularly thought about it if they seemed young? 20 MR. CRITTON: Form. 21 THE WITNESS: I don't -- I didn't see that 22 many young girls, you know, young, underage girls 23 at the house. I never saw except the two girls 24 that I mentioned that I think it was underage was 25 N. for sure because she was still in high school.</p>
Page 46	Page 48
<p>1 deposition, that I know you're going to confiscate 2 Exhibit number 1. I think it's inappropriate. I 3 think I should be allowed to have a copy of 4 Exhibits that are being used in deposition. But 5 I'll file a motion with the Court so we don't get 6 into a pulling match over your Exhibits. 7 MR. BERGER: I would ask that the court 8 reporter initial that. 9 MS. EZELL: Sure. 10 Oh, you did? 11 MR. WILLITS: She marked it. 12 MR. BERGER: Did she put her initials or did 13 she just put a number or a letter? 14 MR. CRITTON: She's nodding that she did 15 everything that she usually does, which means, 16 initials, date and number. 17 MR. MERMELSTEIN: You can talk. 18 MR. WILLITS: But when you talk, use your 19 initials. 20 BY MS. EZELL: 21 Q. How old did you think V.R. was at the time she 22 began coming to Mr. Epstein's home? 23 A. She could have been 17, 18, 19. 24 Q. Could she have also been 15? 25 MR. CRITTON: Form.</p>	<p>1 And she -- she had dinner with her mother, a couple 2 times with her mother. And she become an actress. 3 She's an actress and she has done movies. And he 4 help her in her career. 5 That's the only girl that I knew she was young 6 because she was going to high school and I pick her 7 up from high school sometimes. But she was not a 8 massage therapist. She will go for dinner. And 9 they will go for the movies and she sang sometimes 10 because she was a singer. So she sung at the 11 house. Beautiful girl. Very talented. 12 That's the only girl that I know that it 13 was -- I would says, underage. 14 BY MS. EZELL: 15 Q. Okay. Did -- who told you that V.R. was a 16 massage therapist? 17 A. Nobody. 18 Q. Did you assume that she was a massage 19 therapist because you were told she was coming to give a 20 massage? 21 A. No. I assumed she was a massage therapy 22 because I was -- I drove Ms. Maxwell to Mar-a-lago, 23 Donald Trump's residence. And I wait in the car while 24 Ms. Maxwell got a -- I think it was a facial or massage. 25 I don't know. But that day I remember this girl, V.,</p>

Page 69

1 MR. CRITTON: Form.

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

3 BY MS. EZELL:

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

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

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

14 A. The secretary?

15 Q. Yes.

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

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

Page 70

1 A. Yes.

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

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

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

7 A. He spoke to it?

8 Q. Yes.

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

12 Q. Who did you see at house?

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

16 Q. Princess?

17 A. Sarah, the wife of Andrew.

18 Q. Sarah Ferguson?

19 A. Ferguson.

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

Page 71

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

3 Who else? Mr. Trump. That's a celebrity.

4 Mr. Robert Kennedy, Junior. Mr. Frederick Fekkai.

5 Q. Who is that?

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

9 Q. David Copperfield, the magician?

10 A. No, I never saw him.

11 Q. You never saw him.

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

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

22 Q. Was that a dinner or a reception?

23 A. I think it was a lunch.

24 Q. A lunch.

25 President Clinton, did you ever --

Page 72

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

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

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

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

10 A. No, I was already out.

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

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

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

16 A. Both of them.

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

18 A. Yeah.

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

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

18 (Pages 69 to 72)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506



Page 73	Page 75
<p>1 us.</p> <p>2 Q. Where would he sleep?</p> <p>3 A. In the main room, the main guest bedroom.</p> <p>4 That was the blue room.</p> <p>5 Q. And, so, when he would come and stay, during</p> <p>6 that time would he frequently have massages?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: I would says, daily massages.</p> <p>9 They have a daily massage.</p> <p>10 BY MS. EZELL:</p> <p>11 Q. Was it sometimes more than one a day?</p> <p>12 A. I can't remember if he had more than one, but</p> <p>13 I think it was just a massage for him. We set up the</p> <p>14 tables and --</p> <p>15 Q. Do you have any recollection of V.R. coming to</p> <p>16 the house when Prince Andrew was there?</p> <p>17 A. It could have been, but I'm not sure.</p> <p>18 Q. Not sure. When Mr. Dershowitz was</p> <p>19 visiting, --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- how often did he come?</p> <p>22 A. He came pretty -- pretty often. I would says,</p> <p>23 at least four or five times a year.</p> <p>24 Q. And how long would he stay typically?</p> <p>25 A. Two, three days.</p>	<p>1 MR. LANGINO: Go ahead. Sure.</p> <p>2 BY MS. EZELL:</p> <p>3 Q. You said that you set up the massage tables.</p> <p>4 And would you also set up the oils and the towels?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. And I think I read one time you said they used</p> <p>7 40 or 50 towels a day?</p> <p>8 MR. CRITTON: Form.</p> <p>9 THE WITNESS: That's correct. There was a</p> <p>10 tremendous amount of work in the house, especially</p> <p>11 laundry towels, because they were -- we have</p> <p>12 towels, piles of towels. And they use in the pool.</p> <p>13 There was a lot of people in the pool and there</p> <p>14 were a towel that went in the floor, we have to go</p> <p>15 and pick it up, wash it. So it was -- it was a lot</p> <p>16 of towels, yes.</p> <p>17 BY MS. EZELL:</p> <p>18 Q. And did you ever have occasion to go upstairs</p> <p>19 and clean up after the massages?</p> <p>20 A. Yeah, uh-huh.</p> <p>21 Q. Did you ever find any vibrators in that area?</p> <p>22 A. Yes. I told him, yes.</p> <p>23 MS. EZELL: And did you ask that? I'm sorry.</p> <p>24 MR. CRITTON: Yes.</p> <p>25 MS. EZELL: I don't know how I missed that.</p>
Page 74	Page 76
<p>1 Q. Did he have massages sometimes when he was</p> <p>2 there?</p> <p>3 A. Yes. A massage was like a treat for</p> <p>4 everybody. If they want it, we call the massage and</p> <p>5 they have a massage.</p> <p>6 Q. Now, Mr. Trump had a home in Palm Beach,</p> <p>7 correct?</p> <p>8 A. Uh-huh.</p> <p>9 Q. So he didn't come and stay there, did he?</p> <p>10 A. No, never.</p> <p>11 Q. He would come for a meal?</p> <p>12 A. He would come, have dinner. He never sat at</p> <p>13 the table. He eat with me in the kitchen.</p> <p>14 Q. Did he ever have massages while he was there?</p> <p>15 A. No. Because he's got his own spa.</p> <p>16 Q. Sure.</p> <p>17 MS. EZELL: I don't have any other questions</p> <p>18 right now. I'd just like to reserve if something</p> <p>19 comes up to ask. But, otherwise, you may go ahead.</p> <p>20 MR. LANGINO: It is noon, so I don't know what</p> <p>21 everybody else's schedule is. I don't know how</p> <p>22 you're feeling.</p> <p>23 THE WITNESS: I am fine.</p> <p>24 MS. EZELL: I do have another question. May I</p> <p>25 ask it?</p>	<p>1 BY MS. EZELL:</p> <p>2 Q. Since I did miss it, if you don't mind, let me</p> <p>3 just ask you again.</p> <p>4 Would you describe for me what kinds of</p> <p>5 vibrators you found?</p> <p>6 A. I'm not familiar -- not too familiar with the</p> <p>7 names, but they were big dildos, what they call the big</p> <p>8 rubber things like that (indicating). And I used to go</p> <p>9 and put my gloves on and pick them up, put them in the</p> <p>10 sink, rinse it off and put it in Ms. Maxwell --</p> <p>11 Ms. Maxwell had in her closet, she had, like, a laundry</p> <p>12 basket, one of those laundry basket that you put laundry</p> <p>13 in. She have full of those toys. And that was -- and</p> <p>14 that was me being professional, leaving the room ready</p> <p>15 for bed when he would come back to the room again.</p> <p>16 Q. Okay.</p> <p>17 A. That happened a few times, few times.</p> <p>18 Q. Were there other sex toys that you found in</p> <p>19 the area --</p> <p>20 A. No.</p> <p>21 Q. -- sometimes? You mentioned she kept them in</p> <p>22 a basket in her closet?</p> <p>23 A. She kept them in her basket. She had some</p> <p>24 videos there and she have a costume there. I know that</p> <p>25 she bought it, that she brought it with her.</p>

Page 77

1 Q. What kind of costume?

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

4 Q. Was it leather?

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

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

9 THE WITNESS: You're welcome.

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

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

15 MR. LANGINO: Okay.

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

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

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

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

21 MR. LANGINO: That was my question.

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

23 Do you have any problem with that?

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

Page 78

1 (Lunch recess.)  
2 (Continued to Volume II.)  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 79

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

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

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

15  

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

Page 80

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


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

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

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

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

Dated this 19th day of September, 2009.



Sandra W. Townsend, Court Reporter

20 (Pages 77 to 80)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506