

McCawley Declaration

EXHIBIT 6
(Filed Under Seal)

Page 1	Page 3
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE No.08-CV-80119-CIV-MARRA/JOHNSON	1 On behalf of the Defendant: 2 ROBERT J. CRITTON, ESQUIRE 3 BURMAN, CRITTON & LUTTIER 4 515 North Flagler Drive, Suite 400 5 West Palm Beach, Florida 33401 6 Phone: 561.842.2820 7 rcrit@bclclaw.com 8 mpike@bclclaw.com
JANE DOE NO. 2, -vs- JEFFREY EPSTEIN, Defendant.	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
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	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
VIDEOTAPED DEPOSITION OF JUAN ALESSI VOLUME I	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Tuesday, September 8, 2009 10:12 a.m. - 3:45 p.m.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
2139 Palm Beach Lakes Boulevard West Palm Beach, Florida 33401	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Reported By: Sandra W. Townsend, FPR Notary Public, State of Florida PROSE COURT REPORTING AGENCY West Palm Beach Office	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 2	Page 4
1 APPEARANCES: 2 On behalf of the Plaintiffs: 3 RICHARD WILLITS, ESQUIRE 4 RICHARD H. WILLITS, P.A. 5 2290 10th Avenue North, Suite 404 6 Lake Worth, Florida 33461 7 Phone: 561.582.7600 8 reelrhw@hotmail.com	1 - - - 2 EXHIBITS 3 - - - 4 5 NUMBER DESCRIPTION PAGE 6 Exhibit number 1 Photographs 45 7 Exhibit number 2 Transcript 130 8 Exhibit number 3 Incident Report 137 9 Exhibit number 4 Incorporation Papers 149 10 Exhibit number 5 Incorporation Papers 150 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 (Pages 1 to 4)

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

<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.</p> <p>5 MR. CRITTON: I think we cannot trust that 6 people will do them serially. I'd do them with 7 each one.</p> <p>8 MS. EZELL: Then would you mark this, please, 9 as Exhibit 1 to this deposition.</p> <p>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.</p> <p>13 (Exhibit number 1 was marked for 14 identification purposes and retained by Counsel for the 15 Plaintiffs.)</p> <p>16 THE WITNESS: Yes, that's --</p> <p>17 BY MS. EZELL:</p> <p>18 Q. Can you identify that -- the young woman in 19 those pictures?</p> <p>20 A. Yes.</p> <p>21 Q. Who is it?</p> <p>22 A. That's V. -- V. Now that you says R., that 23 is V.R. definite, a hundred percent.</p> <p>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.</p> <p>5 MR. CRITTON: Kathy thinks she's 25.</p> <p>6 MS. EZELL: In my dreams.</p> <p>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.</p> <p>10 BY MS. EZELL:</p> <p>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 --</p> <p>15 A. No.</p> <p>16 Q. -- of the young women that came there?</p> <p>17 A. Absolutely not. Absolutely not.</p> <p>18 Q. And, so, you never really focused on that or 19 particularly thought about it if they seemed young?</p> <p>20 MR. CRITTON: Form.</p> <p>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>
<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.</p> <p>7 MR. BERGER: I would ask that the court 8 reporter initial that.</p> <p>9 MS. EZELL: Sure.</p> <p>10 Oh, you did?</p> <p>11 MR. WILLITS: She marked it.</p> <p>12 MR. BERGER: Did she put her initials or did 13 she just put a number or a letter?</p> <p>14 MR. CRITTON: She's nodding that she did 15 everything that she usually does, which means, 16 initials, date and number.</p> <p>17 MR. MERMELSTEIN: You can talk.</p> <p>18 MR. WILLITS: But when you talk, use your 19 initials.</p> <p>20 BY MS. EZELL:</p> <p>21 Q. How old did you think V.R. was at the time she 22 began coming to Mr. Epstein's home?</p> <p>23 A. She could have been 17, 18, 19.</p> <p>24 Q. Could she have also been 15?</p> <p>25 MR. CRITTON: Form.</p>	<p>1 Page 48 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.</p> <p>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.</p> <p>12 That's the only girl that I know that it 13 was -- I would says, underage.</p> <p>14 BY MS. EZELL:</p> <p>15 Q. Okay. Did -- who told you that V.R. was a 16 massage therapist?</p> <p>17 A. Nobody.</p> <p>18 Q. Did you assume that she was a massage 19 therapist because you were told she was coming to give a 20 massage?</p> <p>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>

12 (Pages 45 to 48)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

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 [REDACTED] in New
13 York?

14 A. The secretary?

15 Q. Yes.

16 A. Yeah. I would call -- I would call [REDACTED]
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 71

1 [REDACTED], she stay there for a week with her
2 kids and we took care of her.

3 Who else? [REDACTED]. That's a celebrity.

4 [REDACTED]

5 Q. Who is that?

6 A. [REDACTED]

7 [REDACTED]. Who else? I don't think I can remember
8 anymore.

9 Q. [REDACTED]?

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 [REDACTED], the -- I
15 can't remember his name. It was an old gentleman. He
16 was a [REDACTED], I think, or [REDACTED].
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 [REDACTED]. 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 [REDACTED], did you ever --

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 [REDACTED]. It was [REDACTED].

14 [REDACTED]. It was [REDACTED]. It was [REDACTED]. It
15 was [REDACTED].

16 Q. [REDACTED]

17 A. [REDACTED].

18 Q. [REDACTED]

19 A. [REDACTED].

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 -- [REDACTED]

Page 72

1 A. I met [REDACTED] 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 [REDACTED] 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 [REDACTED], did you ever meet him?

12 A. No. I hear about it on the news, but I never
13 met him.14 Q. Were [REDACTED] 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. [REDACTED] did. I think [REDACTED] 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 [REDACTED], yes, [REDACTED] spent weeks with

18 (Pages 69 to 72)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

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

19 (Pages 73 to 76)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506