

EXHIBIT 19

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

_____ /

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

_____ /

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

JEFFREY EPSTEIN,
Defendant.

_____ /

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

_____ /

<p style="text-align: right;">Page 2</p> <p>1 JANE DOE NO. 6, Case No: 08-CV-80994 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant. _____/</p> <p>6 JANE DOE NO. 7, Case No. 08-CV-80993 7 Plaintiff, 8 Vs 9 JEFFREY EPSTEIN, 10 Defendant. _____/</p> <p>11 C.M.A., Case No: 08-CV-80811 12 Plaintiff, 13 Vs 14 JEFFREY EPSTEIN, 15 Defendant. _____/</p> <p>16 JANE DOE, Case No: 08-CV-80893 17 Plaintiff, 18 Vs 19 JEFFREY EPSTEIN, 20 Defendant. _____/</p> <p>21 22 23 24 25</p>	<p style="text-align: right;">Page 4</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 of 4 ALFREDO RODRIGUEZ 5 6 taken on behalf of the Plaintiffs pursuant 7 to a Re-Notice of Taking Deposition (Duces Tecum) 8 9 - - - 10 APPEARANCES: 11 12 MERMELSTEIN & HOROWITZ, P.A. 13 BY: STUART MERMELSTEIN, ESQ. 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 20 ROTHSTEIN ROSENFELDT ADLER 21 BY: BRAD J. EDWARDS, ESQ., and 22 CARA HOLMES, ESQ. 23 Las Olas City Centre 24 Suite 1650 25 401 East Las Olas Boulevard Fort Lauderdale, Florida 33301 Attorney for Jane Doe and E.W. And L.M. PODHURST ORSECK BY: KATHERINE W. EZELL 25 West Flagler Street Suite 800 Miami, Florida 33130 Attorney for Jane Doe 101 and 102.</p>
<p style="text-align: right;">Page 3</p> <p>1 JANE DOE NO. II, Case No: 08-CV-80469 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant. _____/</p> <p>6 JANE DOE NO. 101, Case No: 09-CV-80591 7 Plaintiff, 8 Vs 9 JEFFREY EPSTEIN, 10 Defendant. _____/</p> <p>11 JANE DOE NO. 102, Case No: 09-CV-80656 12 Plaintiff, 13 Vs 14 JEFFREY EPSTEIN, 15 Defendant. _____/</p> <p>16 17 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 style="text-align: right;">Page 5</p> <p>1 APPEARANCES: 2 3 LEOPOLD-KUVIN 4 ADAM J. LANGINO, ESQ. 5 2925 PGA Boulevard 6 Suite 200 7 Palm Beach Gardens, Florida 33410 8 Attorney for B.B. 9 10 RICHARD WILLITS, ESQ. 11 2290 10th Avenue North 12 Suite 404 13 Lake Worth, Florida 33461 14 Attorney for C.M.A. 15 16 BURMAN, CRITTON, LUTTIER & 17 COLEMAN, LLP 18 BY: ROBERT CRITTON, ESQ. 19 515 North Flagler Drive 20 Suite 400 21 West Palm Beach, Florida 33401 22 Attorney for Jeffrey Epstein. 23 24 25 ALSO PRESENT: 26 27 JOE LANGSAM, VIDEOGRAPHER 28 29 - - - 30 31 32 33 34 35</p>

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

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

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

<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>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2, CASE NO: 08-CV-80119

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO: 08-CV-80232

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 4,

CASE NO: 08-CV-80380

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO: 08-CV-80381

Plaintiff,

Vs

JEFFREY EPSTEIN,

Defendant.

CONDENSED

Page 271

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

6 JANE DOE NO. 7, CASE NO: 08-CV-80993
7 Plaintiff,
8 Vs.

9 JEFFREY EPSTEIN,
10 Defendant.

11 C.M.A., CASE NO: 08-CV-80811
12 Plaintiff,
13 Vs.
14 JEFFREY EPSTEIN,
15 Defendant.

16 JANE DOE, CASE NO: 08-CV-80893
17 Plaintiff,
18 Vs.

19 JEFFREY EPSTEIN,
20 Defendant.

Page 272

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

6 JANE DOE NO. 101 CASE NO: 08-CV-80591
7 Plaintiff,
8 Vs.

9 JEFFREY EPSTEIN,
10 Defendant.

11 JANE DOE NO. 102, CASE NO: 08-CV-80656
12 Plaintiff,
13 Vs.
14 JEFFREY EPSTEIN,
15 Defendant.

Page 273

1 IN THE CIRCUIT COURT OF THE 15TH
2 JUDICIAL CIRCUIT IN AND FOR
3 PALM BEACH COUNTY, FLORIDA
4 CASE NO. 502008CA037319XXXMB AB

5 B.B.,

6 Plaintiff,

7 Vs.

8 JEFFREY EPSTEIN.

9 Defendant.

10 1031 Ives Dairy Road
11 Suite 228
12 North Miami, Florida
13 August 7, 2009
14 1:15 p.m. to 5:30 p.m.

15 CONTINUED
16 VIDEOTAPED
17 DEPOSITION
18 of
19 ALFREDO RODRIGUEZ

20 taken on behalf of the Plaintiffs pursuant
21 to a Re-Notice of Taking Continued Videotaped
22 Deposition (Duces Tecum)
23 ---
24
25

Page 274

1 APPEARANCES:

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8 6, and 7.

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2 (Pages 271 to 274)

Page 275

Page 277

1 APPEARANCES:

2
3 RICHARD WILLITS, ESQ.
4 2290 10th Avenue North
Suite 404
5 Lake Worth, Florida 33461
Attorney for C.M.A.
6 Appeared via telephone.
7
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COLEMAN, LLP
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515 North Flagler Drive
10 Suite 400
West Palm Beach, Florida 33401
Attorney for Jeffrey Epstein.

11 ALSO PRESENT:

12
13 JOE LANGSAM, VIDEOGRAPHER
14
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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 a continuation
6 of the deposition of Alfredo Rodriguez.
7 Today is Friday, August the 7th, the year
8 2009, starting time approximately 1:15 p.m.
9 Will the court reporter please swear in
10 the witness?

11 Thereupon,

12 ALFREDO RODRIGUEZ,
13 having been first duly sworn or affirmed, was
14 examined and testified as follows:

15 MR. CRITTON: Before we get started just
16 with regard to Ms. Ezell represents Jane Doe
17 101 and 102, the alleged time of her
18 incidents as of least have been plead in the
19 complaint for 101 is '99 -- I'm sorry, '98
20 through 2002, with Jane Doe 102 the Spring
21 of -- Spring/Summer of 2003. Mr. Rodriguez
22 never even began employment until '04 and
23 '05. I think her questioning I think -- I
24 can't say she doesn't have standing based on
25 the court order, but I would say it's

Page 276

Page 278

1 CONTINUED INDEX OF EXAMINATION

2 WITNESS DIRECT CROSS REDIRECT RECROSS

3 ALFREDO RODRIGUEZ

4 (By Ms. Ezell) 278 441, 467
5 (By Mr. Willits) 334 453, 469
6 (By Mr. Critton) 338 464
7 (By Mr. Edwards) 419, 454, 468
8 (By Mr. Langino) 452
9
10
11

12 CONTINUED INDEX OF EXHIBITS

13 PLAINTIFF'S PAGE
14 3 Drawing 315
15 4 Photograph 327
16 5 Photograph 331
17 6 Photograph 331
18 7 Photograph 331
19 8 Photograph 331
20 9 Report 446
21 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms.
Ezell.)
22
23
24
25

1 completely irrelevant and immaterial and has
2 no probative value with regard to this
3 particular witness based upon the two
4 clients at least that are in suit at this
5 point in time.

6 MS. EZELL: As Mr. Critton well knows I
7 represent a number of other clients whose
8 cases have not been filed and I believe we
9 do have standing to ask questions, and I do
10 intend to do that today.

11 EXAMINATION

12 BY MS. EZELL:

13 Q. Mr. Rodriguez, you stated last time that
14 there were guests at the house, frequent guests,
15 friends from Harvard.

16 Do you remember that testimony?

17 A. Yes, ma'am.

18 Q. And was there a lawyer from Harvard named
19 Alan Dershowitz?

20 A. Yes, ma'am.

21 Q. And are you familiar with the fact that
22 he's a famous author and famous lawyer?

23 A. Yes, ma'am.

24 Q. How often during the six months or so
25 that you were there was Mr. Dershowitz there?

Page 279

1 A. Two or three times.
 2 Q. And did you have any knowledge of why he
 3 was visiting there?
 4 A. No, ma'am.
 5 Q. You don't know whether or not he was a
 6 lawyer -- acting as a lawyer or whether he was
 7 there as a friend?
 8 A. I believe as a friend.
 9 Q. Were there also young ladies in the house
 10 at the time he was there?
 11 MR. CRITTON: Form.
 12 THE WITNESS: Yes, ma'am.
 13 BY MS. EZELL:
 14 Q. And would those have included, for
 15 instance, Sarah Kellen and Nadia Marcenacova?
 16 A. Yes, ma'am.
 17 Q. Were there other young ladies there when
 18 Mr. Dershowitz was there?
 19 MR. CRITTON: Form.
 20 THE WITNESS: Yes, ma'am.
 21 BY MS. EZELL:
 22 Q. Do you have any idea who those young
 23 women were?
 24 A. No, ma'am.
 25 Q. Were any of those the young women that

Page 280

1 you have said came to give massages?
 2 A. Yes, ma'am.
 3 Q. And do you have any idea whether or not
 4 Mr. Dershowitz was also receiving massages?
 5 A. I don't know, Ma'am.
 6 Q. I want to ask you to take this piece of
 7 paper, please, and a pencil --
 8 MR. WILLITS: Can anybody hear me?
 9 MS. EZELL: Yes. Can you hear me?
 10 MR. WILLITS: I've heard nothing for
 11 about a minute or so.
 12 MR. CRITTON: Can you hear me now?
 13 MR. WILLITS: Yes.
 14 MS. EZELL: I'm asking questions, I'm
 15 sorry.
 16 MR. CRITTON: Why don't we go off the
 17 record for a second.
 18 (Thereupon, a discussion was held off the
 19 record.)
 20 THE VIDEOGRAPHER: We're back on the
 21 record.
 22 BY MS. EZELL:
 23 Q. Mr. Rodriguez, you indicated that there
 24 were several staircases in the house?
 25 A. Yes, ma'am.

Page 281

1 Q. Can you tell me where those were?
 2 A. One in the kitchen, and the one in the
 3 formal -- the main entrance. And there was one
 4 more added later on, but there is two when I was
 5 working there.
 6 Q. Could you just give me a rough sketch of
 7 the house of where the main entrance was and where
 8 the kitchen was?
 9 A. I'm not an architect but it's something
 10 like this. This is the kitchen, this is the main
 11 entrance.
 12 Q. Will you mark the kitchen with a K,
 13 please, and the main entrance with ME?
 14 A. This is the pool.
 15 Q. The pool?
 16 A. Yes, ma'am.
 17 Q. And in the upper left?
 18 A. In the terrace, yeah, there was a balcony
 19 here.
 20 Q. And where were the staircases?
 21 A. This is one, the kitchen, one in the
 22 foyer, and the pool.
 23 Q. Okay. And would you just put an F where
 24 the foyer staircase began? And KS where the
 25 kitchen staircase began.

Page 282

1 And you said that later another staircase
 2 was added?
 3 A. Yeah, we rehabilitated this, you know,
 4 but you asked me how many stairs there were, to
 5 answer your question there were three.
 6 Q. Three. So where was the third one?
 7 A. The pool, this leads to the pool.
 8 Through the outside master bedroom you could go
 9 downstairs to the pool.
 10 Q. Okay. A stairway then from the outside,
 11 from outside the master bedroom?
 12 A. Yes, ma'am.
 13 Q. Down to the pool?
 14 A. Yes, ma'am.
 15 Q. One of your duties was to answer the
 16 door. Is that correct?
 17 A. Yes, ma'am.
 18 Q. Which door would you answer?
 19 A. Mainly the kitchen.
 20 Q. And why was that, why would people mainly
 21 come to the kitchen?
 22 A. I'll say it was for practicable reasons
 23 because not to go to the main -- it was shorter
 24 because the entrance was here, so this was the
 25 driveway and we used to take into the back door of

4 (Pages 279 to 282)

Page 383

1 you about having driven A.H. and you recalled
2 having had her in the Suburban specifically.
3 A. Yes.
4 Q. Do you remember any of the other girls,
5 women who came to give massages ever having driven
6 them, or is A.H. the only one that you remember?
7 MR. EDWARDS: Form.
8 THE WITNESS: I only remember A.H. right
9 now for the fact that I was driving by the
10 airport and I showed her Mr. Epstein's
11 plane.
12 BY MR. CRITTON:
13 Q. All right. Which really takes me back to
14 really where I started with this series of
15 questions.
16 You saw the girls, the women who came in
17 to give the massages, when they came in if you
18 were advised or if you heard conversation and you
19 saw them you would see them when they left?
20 A. Yes.
21 Q. And you saw A.H. because she was in the
22 Suburban on at least one occasion?
23 A. Yes.
24 Q. And, therefore, you never saw these
25 girls, these women who gave the massages in the

Page 384

1 dining room or the library. Would that be a fair
2 statement?
3 A. That's correct.
4 MR. EDWARDS: Form.
5 BY MR. CRITTON:
6 Q. All right. So, therefore, the pictures
7 that you saw Sarah Kellen taking of girls, women,
8 either in the dining room or library, those were
9 other individuals other than those who may have
10 given or who came for massages. Is that correct?
11 MS. EZELL: Form.
12 MR. EDWARDS: Form.
13 THE WITNESS: It's confusing, sir,
14 because there were a bunch of girls. I
15 don't know which one they were but I saw her
16 taking pictures of the groups.
17 BY MR. CRITTON:
18 Q. As to whether they were people who came
19 in on the planes or there may have been a massage
20 girl or more than one woman who gave a massage,
21 you just don't know as you sit here, you'd just be
22 speculating. Is that correct?
23 MR. EDWARDS: Form.
24 THE WITNESS: I don't know.
25 BY MR. CRITTON:

Page 385

1 Q. All right. Ms. Ezell asked you about Mr.
2 Dershowitz being present in Mr. Epstein's home,
3 and I think she asked -- and I think that you said
4 Mr. Epstein was a -- and he and Mr. Dershowitz
5 were friends?
6 A. Yes.
7 Q. She also I think asked was Mr. Dershowitz
8 ever there when one of the women who gave a
9 massage was present in the home?
10 A. I don't remember that.
11 Q. That's what I want to clear up. Is it
12 your testimony that Mr. Dershowitz was there when
13 any of the women came to Mr. Epstein's home to
14 give a massage?
15 A. Yes.
16 MR. EDWARDS: Form.
17 BY MR. CRITTON:
18 Q. As to whether any of those women were
19 ever associated with Mr. Dershowitz would it be a
20 correct statement that you have absolutely no
21 knowledge?
22 A. I don't know, sir.
23 Q. You don't know?
24 A. I don't know, sir.
25 MS. EZELL: Form.

Page 386

1 BY MR. CRITTON:
2 Q. Okay. Were you in any way attempting in
3 your response to Ms. Ezell to imply that Mr.
4 Dershowitz had a massage by one of these young
5 ladies?
6 A. I don't know, sir.
7 Q. You have no knowledge?
8 A. No, sir.
9 Q. And you certainly weren't implying that
10 that occurred, you just have no knowledge.
11 Correct?
12 MR. EDWARDS: Form.
13 THE WITNESS: I don't know.
14 BY MR. CRITTON:
15 Q. Sorry?
16 A. I don't know.
17 Q. I think in response to one of Ms. Ezell's
18 questions you responded that -- let me ask it this
19 way.
20 You never saw Mr. Epstein ever take
21 photographs of anyone. Would that be a correct
22 statement?
23 A. Yes.
24 Q. Would it be a correct statement you never
25 saw Mr. Epstein initiate a phone call to anyone?

30 (Pages 383 to 386)

Page 423

1 York house?
2 A. He will have massages.
3 MR. CRITTON: Form.
4 BY MR. EDWARDS:
5 Q. And are we still talking about a habit of
6 two a day?
7 MR. CRITTON: Form.
8 THE WITNESS: I don't know that.
9 BY MR. EDWARDS:
10 Q. Okay. So for the time period when you
11 have been familiar with Mr. Epstein and known his
12 habits, is it fair to say that he would have
13 roughly two girls a day in that same age group
14 wherever he was?
15 A. Yes.
16 MR. CRITTON: Form.
17 BY MR. EDWARDS:
18 Q. All right. And have you talked to
19 anybody that has given you similar information
20 from his Island home?
21 A. No.
22 Q. Do you know any of the girls that have
23 been over to his Island?
24 A. Yes.
25 Q. And who are they?

Page 424

1 A. Nadia, the girls who used to stay at the
2 home in El Brillo used to go over there to the
3 Island.
4 Q. When he would have these girls -- I guess
5 we've kind of categorized them as the girls who
6 would come over with him on an airplane and stay
7 at the house.
8 A. Yes.
9 Q. When they would be staying at the house
10 would he also have the local Palm Beach girls
11 coming over that you were told to call masseuses?
12 A. Yes.
13 Q. So these girls that came on the airplane
14 with him, were they also -- did they also have
15 knowledge that these young girls were coming over
16 to give massages?
17 MR. CRITTON: Form.
18 THE WITNESS: Yes, sir.
19 BY MR. EDWARDS:
20 Q. Okay. Who are the girls from the
21 airplane other than Nadia that you remember?
22 A. Sarah. There were so many, sir, I don't
23 recall right now. But Sarah is for sure, Nadia
24 was one of the main girlfriends, but I don't
25 remember that.

Page 425

1 Q. And is your understanding that Mr.
2 Epstein was intimate with any of those girls?
3 MR. CRITTON: Form.
4 THE WITNESS: Yes.
5 BY MR. EDWARDS:
6 Q. With all of them?
7 MR. CRITTON: Form.
8 THE WITNESS: Yes.
9 BY MR. EDWARDS:
10 Q. With Sarah as well?
11 A. Yes.
12 MR. CRITTON: Form.
13 BY MR. EDWARDS:
14 Q. With Nadia?
15 A. Yes.
16 MR. CRITTON: Form.
17 BY MR. EDWARDS:
18 Q. And the girls who would come over on the
19 airplane?
20 MR. CRITTON: Form.
21 THE WITNESS: Yes.
22 BY MR. EDWARDS:
23 Q. Did you ever have occasion to go into the
24 bedroom and find the vibrators or back massagers
25 out after Mr. Epstein was in the room with any of

Page 426

1 the girls that came over on the plane?
2 MR. CRITTON: Form.
3 THE WITNESS: Yes.
4 BY MR. EDWARDS:
5 Q. So that's something that would be out
6 after the girls that came over on the plane or the
7 girls that came over for the massages?
8 A. Yes.
9 MR. CRITTON: Form.
10 BY MR. EDWARDS:
11 Q. And at the time when you were house
12 manager you had a 15-year old daughter?
13 A. Yes.
14 Q. Did she live down here?
15 A. In New Jersey.
16 Q. Okay. When Alan Dershowitz was at the
17 house I understood you to say that these local
18 Palm Beach girls would come over to the house
19 while he was there but you're not sure if he had a
20 massage from any of those girls.
21 A. Exactly.
22 Q. And what would he do while those girls
23 were at the house?
24 MR. CRITTON: Form.
25 THE WITNESS: He will read a book with a

40 (Pages 423 to 426)

<p style="text-align: right;">Page 427</p> <p>1 glass of wine by the pool, stay inside. 2 BY MR. EDWARDS: 3 Q. Did he ever talk to any of the girls? 4 A. I don't know, sir. 5 Q. Certainly he knew that they were there? 6 MR. CRITTON: Form. 7 THE WITNESS: I don't know, sir. 8 BY MR. EDWARDS: 9 Q. Do you know how Sarah Kellen knows Mr. 10 Epstein? 11 A. No, sir. 12 Q. Or how long she's known him? 13 MR. CRITTON: Form. 14 THE WITNESS: She was on board two years 15 or a year and a half before I came on board. 16 BY MR. EDWARDS: 17 Q. Okay. 18 A. So it's probably 2003 or 2. 19 Q. All right. You mentioned this Citrix 20 system. 21 A. Yes. 22 Q. Is that a system that was used to operate 23 the phones and the computers? 24 A. The computers mainly. 25 Q. All right. But you then also described</p>	<p style="text-align: right;">Page 429</p> <p>1 usually it's Yahoo dot com or at Bellsouth dot 2 net. 3 A. It was very uncommon. I don't remember, 4 sir. 5 Q. Did everybody in the -- I think you 6 called it the organization, did everybody have 7 e-mails? 8 A. Yes. 9 Q. Okay. Would that include Nadia? 10 A. Yes. 11 Q. All right. And did Mr. Epstein have an 12 e-mail? 13 A. Yes. 14 Q. Did you ever correspond with Mr. Epstein 15 by e-mail? 16 A. Yes. 17 MR. EDWARDS: You can go ahead. 18 THE WITNESS: That's the only one that I 19 remember. 20 THE VIDEOGRAPHER: Okay, we're off the 21 record. 22 (Thereupon, a recess was had.) 23 THE VIDEOGRAPHER: We're back on the 24 record with tape number four. 25 BY MR. EDWARDS:</p>
<p style="text-align: right;">Page 428</p> <p>1 some system where someone would call on the 2 telephone and that would be automatically 3 downloaded to the computer? 4 A. Yeah, you can retrieve who called in a 5 transcript written who called, what's the message, 6 the time so you have it on a piece of paper, you 7 can print it out. 8 Q. Is it your understanding that is also 9 part of the Citrix system? 10 A. Yes. 11 Q. All right. Did you have an e-mail? 12 A. Right now, yes. 13 Q. No, when you were working at -- 14 A. Yes, I did. 15 Q. -- Mr. Epstein? 16 And did Sarah Kellen have an e-mail? 17 A. Yes. 18 Q. And did all of the e-mails end the same 19 way such as Epstein's house dot com or something? 20 A. Yes. 21 Q. Okay. What was Sarah Kellen's e-mail? 22 A. I don't remember. 23 Q. What was your e-mail? 24 A. Staff house -- I don't remember, sir. 25 Q. Do you recall how it ended? I mean</p>	<p style="text-align: right;">Page 430</p> <p>1 Q. Mr. Rodriguez, what was Mr. Epstein's 2 e-mail? 3 A. Jeep project at something -- Jeep 4 project -- I can't remember it right now. 5 Q. Okay. In the course of this next 10 or 6 15 minutes -- 7 A. I can recall. 8 Q. -- if it comes to you just tell me. So 9 it was Jeep project -- 10 A. Like Jeep, the brand name Jeep, Jeep 11 project at -- I can't remember. 12 Q. Okay. Was that his only e-mail to your 13 knowledge? 14 A. No. 15 Q. He had other e-mail addresses? 16 A. Yes. 17 Q. Do you know what any of his other e-mail 18 addresses were? 19 A. No, I don't remember. 20 Q. Do you know who the carriers were for the 21 other e-mail addresses owned by Jeffrey Epstein? 22 A. No, sir. 23 Q. Whether it was Yahoo or hot mail or -- 24 A. No, none of those. 25 Q. Okay. Was this Jeep project e-mail run</p>