

EXHIBIT 19

Page 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 JANE DOE NO. 3, Case NO: 08-CV-80232
9 Plaintiff,
10 Vs
11 JEFFREY EPSTEIN,
12 Defendant.

_____ /

13 JANE DOE NO. 4, Case No: 08-CV-80380
14 Plaintiff,
15 Vs.
16 JEFFREY EPSTEIN,

17 Defendant.

18 _____ /

19 JANE DOE NO. 5, Case No: 08-CV-80381
20 Plaintiff,
21 Vs
22 JEFFREY EPSTEIN,
23 Defendant.

24 _____ /
25

Page 2

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.

/

21

22

23

24

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Page 4

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 A P P E A R A N C E S :

11

12 M E R M E L S T E I N & 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

20 R O T H S T E I N R O S E N F E L D T A D L E R

21 B Y : B R A D J . E D W A R D S , E S Q . , a n d

22 C A R A H O L M E S , E S Q .

23 L a s O l a s C i t y C e n t r e

24 S u i t e 1650

25 401 E a s t L a s O l a s B o u l e v a r d

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

A t t o r n e y f o r J a n e D o e a n d E . W .

A n d L . M .

26

27 P O D H U R S T O R S E C K

28 B Y : K A T H E R I N E W . E Z E L L

29 25 W e s t F l a g l e r S t r e e t

30 S u i t e 800

31 M i a m i , F l o r i d a 3 3 1 3 0

32 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 .

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Page 3

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: 09-CV-80591

7 Plaintiff,

8 Vs

9 JEFFREY EPSTEIN,

10 Defendant.

/

11 JANE DOE NO. 102, Case No: 09-CV-80656

12 Plaintiff,

13 Vs

14 JEFFREY EPSTEIN,

15 Defendant.

/

16 1031 Ives Dairy Road

17 Suite 228

18 N o r t h M i a m i , F l o r i d a

19 J u l y 2 9 , 2 0 0 9

20 11:00 a.m. to 5:30 p.m.

21

22

23

24

25

Page 5

1 A P P E A R A N C E S :

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 200

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 404

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 &

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 400

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

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17 A L S O P R E S E N T :

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19 J O E L A N G S A M , V I D E O G R A P H E R

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Page 5

2 (Pages 2 to 5)

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

<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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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,

V_ε

JEFFREY EPSTEIN,

Defendant

CONDENSED

JANE DOE NO. 4.

CASE NO: 08-CV-80380

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5.

CASE NO: 08-CV-80381

Plaintiff

JEFFREY ERNSTIN

		Page 271	
1	JANE DOE NO. 6, 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant. /	CASE NO: 08-CV-80994	1 IN THE CIRCUIT COURT OF THE 15TH 2 JUDICIAL CIRCUIT IN AND FOR 3 PALM BEACH COUNTY, FLORIDA 4 CASE NO. 502008CA037319XXXXMB AB
6	JANE DOE NO. 7, 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant. /	CASE NO: 08-CV-80993	5 B.B., 6 Plaintiff, 7 Vs. 8 JEFFREY EPSTEIN. 9 Defendant. /
11	C.M.A., 12 Plaintiff, 13 Vs. 14 JEFFREY EPSTEIN, 15 Defendant. /	CASE NO: 08-CV-80811	10 11 12 1031 Ives Dairy Road 13 Suite 228 14 North Miami, Florida 15 August 7, 2009 16 1:15 p.m. to 5:30 p.m. 17 18 19 20 21 22 23 24 25
17	JANE DOE, 18 Plaintiff, 19 Vs. 20 JEFFREY EPSTEIN, 21 Defendant. /	CASE NO: 08-CV-80893	16 CONTINUED 17 VIDEOTAPED 18 DEPOSITION 19 of 20 ALFREDO RODRIGUEZ 21 22 taken on behalf of the Plaintiffs pursuant 23 to a Re-Notice of Taking Continued Videotaped 24 Deposition (Duces Tecum) 25
		Page 272	
1	JANE DOE NO. II, 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant. /	CASE NO: 08-CV-80469	1 APPEARANCES: 2 3 MERMELSTEIN & HOROWITZ, P.A. 4 BY: ADAM HOROWITZ, ESQ. 5 18205 Biscayne Boulevard 6 Suite 2218 7 Miami, Florida 33160 8 Attorney for Jane Doe 2, 3, 4, 5, 9 6, and 7. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
6	JANE DOE NO. 101 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant. /	CASE NO: 08-CV-80591	ROTHSTEIN ROSENFELDT ADLER BY: BRAD J. EDWARDS, ESQ., and CARA HOLMES, ESQ. Las Olas City Centre Suite 1650 401 East Las Olas Boulevard Fort Lauderdale, Florida 33301 Attorney for Jane Doe and E.W. And L.M.
12	JANE DOE NO. 102, 13 Plaintiff, 14 Vs. 15 JEFFREY EPSTEIN, 16 Defendant. /	CASE NO: 08-CV-80656	PODHURST ORSECK BY: KATHERINE W. EZELL, ESQ. 25 West Flagler Street Suite 800 Miami, Florida 33130 Attorney for Jane Doe 101 and 102.
17			LEOPOLD-KUVIN BY: ADAM J. LANGINO, ESQ. 2925 PGA Boulevard Suite 200 Palm Beach Gardens, Florida 33410 Attorney for B.B.
18			
19			
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22			
23			
24			
25			

2 (Pages 271 to 274)

<p>1 APPEARANCES:</p> <p>2 RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. Appeared via telephone.</p> <p>7 BURMAN, CRITTON, LUTTIER & 8 COLEMAN, LLP BY: ROBERT CRITTON, ESQ. 9 515 North Flagler Drive Suite 400 10 West Palm Beach, Florida 33401 Attorney for Jeffrey Epstein.</p> <p>13 ALSO PRESENT: 14 JOE LANGSAM, VIDEOGRAPHER</p> <p>17 - - -</p>	Page 275	Page 277
<p>1 CONTINUED INDEX OF EXAMINATION</p> <p>2 WITNESS DIRECT CROSS REDIRECT RECROSS</p> <p>3 ALFREDO RODRIGUEZ</p> <p>4 (By Ms. Ezell) 278 441, 467</p> <p>5 (By Mr. Willits) 334 453, 469</p> <p>6 (By Mr. Critton) 338 464</p> <p>7 (By Mr. Edwards) 419, 454, 468</p> <p>8 (By Mr. Langino) 452</p> <p>12 CONTINUED INDEX OF EXHIBITS</p> <p>13 PLAINTIFF'S PAGE</p> <p>14 3 Drawing 315</p> <p>15 4 Photograph 327</p> <p>16 5 Photograph 331</p> <p>17 6 Photograph 331</p> <p>18 7 Photograph 331</p> <p>19 8 Photograph 331</p> <p>20 9 Report 446</p> <p>21 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms. Ezell.)</p>	Page 276	Page 278

3 (Pages 275 to 278)

<p style="text-align: right;">Page 279</p> <p>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</p>	<p style="text-align: right;">Page 281</p> <p>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.</p>
<p style="text-align: right;">Page 280</p> <p>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.</p>	<p style="text-align: right;">Page 282</p> <p>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</p>

<p style="text-align: right;">Page 383</p> <p>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</p>	<p style="text-align: right;">Page 385</p> <p>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.</p>
<p style="text-align: right;">Page 384</p> <p>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:</p>	<p style="text-align: right;">Page 386</p> <p>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?</p>

<p>1 York house?</p> <p>2 A. He will have massages.</p> <p>3 MR. CRITTON: Form.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. And are we still talking about a habit of</p> <p>6 two a day?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: I don't know that.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. Okay. So for the time period when you</p> <p>11 have been familiar with Mr. Epstein and known his</p> <p>12 habits, is it fair to say that he would have</p> <p>13 roughly two girls a day in that same age group</p> <p>14 wherever he was?</p> <p>15 A. Yes.</p> <p>16 MR. CRITTON: Form.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. All right. And have you talked to</p> <p>19 anybody that has given you similar information</p> <p>20 from his Island home?</p> <p>21 A. No.</p> <p>22 Q. Do you know any of the girls that have</p> <p>23 been over to his Island?</p> <p>24 A. Yes.</p> <p>25 Q. And who are they?</p>	<p>Page 423</p> <p>1 Q. And is your understanding that Mr.</p> <p>2 Epstein was intimate with any of those girls?</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. With all of them?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. With Sarah as well?</p> <p>11 A. Yes.</p> <p>12 MR. CRITTON: Form.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. With Nadia?</p> <p>15 A. Yes.</p> <p>16 MR. CRITTON: Form.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. And the girls who would come over on the</p> <p>19 airplane?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. Did you ever have occasion to go into the</p> <p>24 bedroom and find the vibrators or back massagers</p> <p>25 out after Mr. Epstein was in the room with any of</p>
<p>Page 424</p> <p>1 A. Nadia, the girls who used to stay at the</p> <p>2 home in El Brillo used to go over there to the</p> <p>3 Island.</p> <p>4 Q. When he would have these girls -- I guess</p> <p>5 we've kind of categorized them as the girls who</p> <p>6 would come over with him on an airplane and stay</p> <p>7 at the house.</p> <p>8 A. Yes.</p> <p>9 Q. When they would be staying at the house</p> <p>10 would he also have the local Palm Beach girls</p> <p>11 coming over that you were told to call masseuses?</p> <p>12 A. Yes.</p> <p>13 Q. So these girls that came on the airplane</p> <p>14 with him, were they also -- did they also have</p> <p>15 knowledge that these young girls were coming over</p> <p>16 to give massages?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: Yes, sir.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. Okay. Who are the girls from the</p> <p>21 airplane other than Nadia that you remember?</p> <p>22 A. Sarah. There were so many, sir, I don't</p> <p>23 recall right now. But Sarah is for sure, Nadia</p> <p>24 was one of the main girlfriends, but I don't</p> <p>25 remember that.</p>	<p>Page 424</p> <p>1 the girls that came over on the plane?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. So that's something that would be out</p> <p>6 after the girls that came over on the plane or the</p> <p>7 girls that came over for the massages?</p> <p>8 A. Yes.</p> <p>9 MR. CRITTON: Form.</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q. And at the time when you were house</p> <p>12 manager you had a 15-year old daughter?</p> <p>13 A. Yes.</p> <p>14 Q. Did she live down here?</p> <p>15 A. In New Jersey.</p> <p>16 Q. Okay. When Alan Dershowitz was at the</p> <p>17 house I understood you to say that these local</p> <p>18 Palm Beach girls would come over to the house</p> <p>19 while he was there but you're not sure if he had a</p> <p>20 massage from any of those girls.</p> <p>21 A. Exactly.</p> <p>22 Q. And what would he do while those girls</p> <p>23 were at the house?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: He will read a book with a</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>Page 427</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>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>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>