

EXHIBIT 6

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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- Plaintiff, 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	
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	
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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

1 (Pages 1 to 4)

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<p>1 bathroom was in the same quarters, his quarters. 2 So we had quite a bit of expensive tables. 3 Q. Did you ever get a massage while you were 4 working for Mr. Epstein? 5 A. I wasn't that lucky. 6 Q. Okay. I'm sorry. 7 A. I don't want to lie. Yes, I did. By a guy. 8 It was a -- occasionally it was male massage 9 therapists there, there were called. They did massages 10 for Mr. Epstein and Ms. Maxwell. 11 And one time I had some pains in my back and I 12 was given as a gift. 13 Q. Now, there came to be an incident where you 14 were arrested that caused you to be terminated from 15 Mr. Epstein? 16 A. No. 17 Q. Were you terminated from Mr. Epstein's 18 employment? 19 A. Yes. 20 Q. Did you promise to pay him back some money? 21 A. Yes. 22 Q. Did you make all the payments? 23 A. Yes, I did. 24 Q. When was the last time you made a payment? 25 A. I made a payment immediately, the same</p>	<p>Page 37</p> <p>1 Q. The latter? 2 A. The latter. 3 Q. What, if anything, can you remember or tell us 4 about your separation agreement? 5 A. It was basically an agreement between him and 6 myself that we will leave after all those years of 7 service. 8 And I regret to agree with the amount, but it 9 was \$30,000 for me and \$20,000 for my wife. 10 And it was -- he give my wife the car that she 11 usually drive. It was a minivan, Chrysler minivan, as 12 part of the -- as part of the separation. She loved 13 that car and she did all the shopping, it was done in 14 that car. 15 So Mr. Epstein was kind enough to give her the 16 car. 17 The rest of the stuff is, was mainly lawyer 18 stuff that you can't understand. But basically that was 19 it. And that it was a part that I think I can -- I 20 would says, it was more or less that I will not sue him 21 later or he cannot sue me for any reasons or -- and it 22 was like a confidentiality issue in that separation 23 agreement. 24 Q. And do you understand that in this instance 25 you are subpoenaed under the power of the Court?</p>
<p>Page 38</p> <p>1 payment, same amount. 2 Q. The full amount? 3 A. Full amount. 4 Q. Okay. It wasn't a payment plan? 5 A. No. 6 MR. WILLITS: I don't have any other 7 questions. You want to take a short break? 8 MR. CRITTON: Would you like to take a short 9 break? 10 THE WITNESS: I'm fine. 11 VIDEOGRAPHER: Off the record, 10:56. 12 (Brief recess.) 13 CROSS EXAMINATION 14 BY MS. EZELL: 15 Q. I'm Catherine Ezell. I want to ask you a few 16 questions about some things that came up during your 17 deposition, your earlier questioning in this deposition. 18 A. Okay. 19 Q. The book of policies that you mentioned that 20 was there by the time you left, I just wanted to 21 clarify, was that done by somebody in Palm Beach to be 22 used by different households in Palm Beach or was it 23 done by someone employed by Jeffrey Epstein to apply to 24 all the homes he -- 25 A. Yes.</p>	<p>Page 40</p> <p>1 A. Absolutely. 2 Q. And that would include matters that would 3 otherwise be confidential? 4 A. Can you repeat that again? 5 Q. Yeah. Do you understand that because you're 6 under subpoena by the Court to give your testimony, -- 7 A. Today. 8 Q. -- truthfully -- yes. 9 A. Uh-huh. 10 Q. That the confidentiality agreement would not 11 control; the Court's subpoena -- 12 A. Oh, yeah. 13 Q. -- controls? 14 A. I understand that. 15 Q. You mentioned Ghislaine Maxwell did photo 16 shoots and kept an album? 17 A. Yes. She was fanatic about photographs -- 18 camera. She had a whole bunch of different cameras and 19 she took all the pictures all over. 20 Q. Did you ever observe her doing a photo shoot 21 of V.? 22 A. No. 23 Q. Did you ever observe her doing a photo shoot 24 of any of the other young women whose names you 25 mentioned?</p>

10 (Pages 37 to 40)

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1	A. Young woman?	1	V.R.? Obviously the tape preserves it. We're not
2	Q. Yes.	2	asking the tape gentleman to edit it.
3	A. No, I can't remember. I know that she went	3	MS. EZELL: Right.
4	out and took pictures in the pool because later on I	4	MR. BERGER: So how is it preserved that V.R.
5	would see them at the desk or at the house.	5	means your client's full name?
6	And nude -- 99.9 percent of the time they were	6	MS. EZELL: Well, we had just agreed in
7	topless. They were European girls. They were --	7	previous depositions that that's the way it would
8	Q. You stated that you believe V.'s name was P.,	8	read. The written transcript would not have the
9	but you weren't sure?	9	full name, but would just have the initials.
10	A. Not sure.	10	MR. BERGER: I'm not so sure that constitutes
11	Q. Could it have been R.?	11	an identification by Mr. Alessi that's going to be
12	A. R., yeah. Could have been.	12	clear. But this is the first deposition I've
13	Q. I want to show you a picture and have it	13	attended, so I'm not sure if I'm -- if what I'm
14	marked as an Exhibit to this deposition.	14	saying has been dealt with or not.
15	MS. EZELL: And did we have the agreement	15	MR. MERMELSTEIN: I think we're working on
16	beforehand that we've been having all along that	16	good faith. Mr. Critton is agreeing that the
17	we're just using initials and not names?	17	name -- and I don't think anyone's going to come
18	MR. WILLITS: My client has waived the	18	back later and say, oh, you meant Vince Robinson or
19	confidentiality as to herself. But I certainly	19	anything like that, so...
20	agree as to everybody else.	20	MR. BERGER: Well, I'm not -- I'm not talking
21	MR. LANGINO: As do I.	21	about Mr. Critton. Bob Critton I have the full
22	MS. EZELL: Is that okay?	22	trust in. I'm just talking about a jury watching
23	MR. CRITTON: That's what we agreed to on the	23	this or reading this transcript believing that
24	last.	24	Mr. Alessi has accurately identified one of these
25	MS. EZELL: Right.	25	victims. That's all. I don't know if you've all
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1	MR. CRITTON: For the court reporter, at	1	thought about that.
2	least, in terms of the -- I guess in terms of the	2	MS. EZELL: Well, for one thing, the jury
3	transcript she gives to us, if you would just use a	3	might, if they're -- if they're hearing or reading
4	first initial and a last initial.	4	his testimony, they most likely would be seeing the
5	MR. WILLITS: So when you ask about V., it	5	video, which would have the full name. Unless the
6	would be V.R. is what the court reporter would	6	Judge allows us to block out names and we haven't
7	write down?	7	come to that point.
8	MS. EZELL: Right.	8	MR. MERMELSTEIN: I think the idea at trial,
9	MR. CRITTON: But make sure everybody uses the	9	V.R., if it's read to the jury would become then
10	full name, because that way we'll have two	10	V.R. It would be read as V.R. But if it's filed
11	initials.	11	with the Court, this transcript, it will be V.R.,
12	MR. WILLITS: When they speak, but she's going	12	and that way it doesn't have to be redacted.
13	to write it down as initials. Is that what you're	13	MR. WILLITS: As I also understood it, if
14	saying? I'm confused about everything.	14	there would be any question at all, we could simply
15	MR. CRITTON: The reason is, is there may be	15	ask the court reporter and she would say, according
16	25, you know, there may be three V.s. So if you	16	to my notes, V.R. is Virgil Robinson and not -- or
17	just mention V. and it just shows up as a V., it	17	whatever her notes show. Wouldn't she be the final
18	won't make sense. So ergo you need to do that.	18	authority?
19	But Carolyn Andriano, his client, she gets the	19	MS. EZELL: Well, she would certainly have
20	whole megillah.	20	that record.
21	MR. WILLITS: Right.	21	MR. CRITTON: You could listen to the tape.
22	MR. BERGER: How is it preserved that we're	22	It would be pretty easy. I think we're making it a
23	talking about your client? You gave her full name	23	lot more complicated than it need be.
24	a minute ago. How is it preserved if she's -- the	24	MR. WILLITS: For once, I agree.
25	court reporter is going to change the full name to	25	MR. CRITTON: I think it will be all right.

11 (Pages 41 to 44)

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<p style="text-align: right;">Page 73</p> <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 style="text-align: right;">Page 75</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>
<p style="text-align: right;">Page 74</p> <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 style="text-align: right;">Page 76</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>

19 (Pages 73 to 76)

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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.

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