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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,
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.

_____ /

11

1 JANE DOE NO. 6, Case No: 08-CV-80994

2 Plaintiff,

3 Vs

4 JEFFREY EPSTEIN,

5 Defendant.

6 _____/

7 JANE DOE NO. 7, Case No. 08-CV-80993

8 Plaintiff,

9 Vs

10 JEFFREY EPSTEIN,

11 Defendant.

12 _____/

13 C.M.A., Case No: 08-CV-80811

14 Plaintiff,

15 Vs

16 JEFFREY EPSTEIN,

17 Defendant.

18 _____/

19 JANE DOE, Case No: 08-CV-80893

20 Plaintiff,

21 Vs

22 JEFFREY EPSTEIN,

23 Defendant.

24 _____/

25

1 JANE DOE NO. II, Case No: 08-CV-80469

2 Plaintiff,

3 Vs

4 JEFFREY EPSTEIN,

5 Defendant.

6 _____/

7 JANE DOE NO. 101, Case No: 09-CV-80591

8 Plaintiff,

9 Vs

10 JEFFREY EPSTEIN,

11 Defendant.

12 _____/

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

14 Plaintiff,

15 Vs

16 JEFFREY EPSTEIN,

17 Defendant.

18 _____/

19

20

21

22 1031 Ives Dairy Road

23 Suite 228

24 North Miami, Florida

25 July 29, 2009

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

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:

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6, and 7.
15

16 ROTHSTEIN ROSENFELDT ADLER
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Attorney for Jane Doe and E.W.
20 And L.M.

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25

1
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15 COLEMAN, LLP
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18 Suite 400
19 West Palm Beach, Florida 33401
20 Attorney for Jeffrey Epstein.

21 ALSO PRESENT:

22 JOE LANGSAM, VIDEOGRAPHER
23
24
25

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INDEX OF EXAMINATION

WITNESS	DIRECT	CROSS
ALFREDO RODRIGUEZ		
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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.

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.

1 Shula, and he sit down in a pad in my house and
2 took notes who do I know, the phone numbers, if I
3 talk to anybody. That was it.

4 Q. And you hadn't spoken to anybody about
5 Mr. Epstein before that?

6 A. No.

7 Q. The man who came to your house, was he
8 one of the same men that you met with at the Don
9 Shula Hotel?

10 A. Yes.

11 Q. And you don't recall his name?

12 A. No, sir.

13 Q. Did he explain to you why he was
14 conducting this investigation and asking you these
15 questions and seeking information from you?

16 A. No. He just wanted to know if I talked
17 to anybody outside the house. I was bound by a
18 confidential agreement so I stick to that.

19 Q. Okay. So you signed a confidentiality
20 agreement with Mr. Epstein?

21 A. Yes.

22 Q. Okay. When did you sign that?

23 A. When I was hired.

24 Q. And what did that agreement provide?

25 A. I shouldn't discuss anything, you know.