

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRA/JOHNSQN

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

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 [REDACTED]
VOLUME II

Tuesday, September 8, 2009
10:12 a.m. - 3:45 p.m.

2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33401

Reported By:

[REDACTED] FPR
Notary Public, State of Florida
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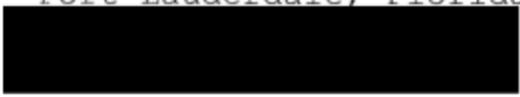
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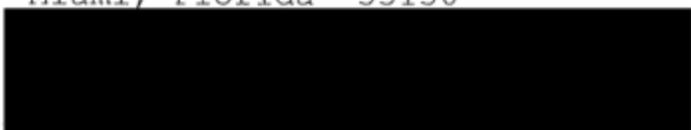
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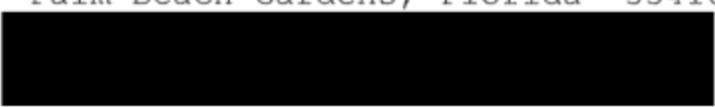
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P R O C E E D I N G S

- - -

Deposition taken before [REDACTED] Court
Reporter and Notary Public in and for the State of
Florida at Large, in the above cause.

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(Continued from Volume I.)

VIDEOGRAPHER: We're going back on the record
at 12:52.

CROSS EXAMINATION

BY MR. LANGINO:

Q. Hello. My name is Adam Langino and I
represent [REDACTED]. I'll have fewer questions than the rest
of everybody, since I'm going next in line. But one of
the things I wanted to ask you --

MR. CRITTON: Before you get started, let me
just put on my objection.

Adam, your client is [REDACTED], who alleges that
she was at Mr. Epstein's house sometime, I think,
on one occasion in the summer of '03.

This witness is neither relevant, nor
material, nor can it lead to the admissibility of
any relevant information regarding my client. So I
understand -- so you certainly can notice him, but
I'll move to strike all of the questions and

1 answers in response to your questions.

2 MR. LANGINO: Thank you.

3 BY MR. LANGINO:

4 Q. One thing I wasn't sure about was the date of
5 your employment. When did you start with Mr. Epstein?

6 A. I am not sure, sir, but I think I started full
7 time on my salary, I was on the roll in 1991. 1991,
8 January 1, 1991.

9 Q. In 1991, you started full time with
10 Mr. Epstein?

11 A. Yes, working for him alone. I left all my
12 clients, I left -- [REDACTED]

13 Q. And in what year did you start part time at
14 his house?

15 A. 1990. '90.

16 Q. You mentioned earlier that some of the massage
17 therapists you paid with checks?

18 A. Yes.

19 Q. And some of the massage therapists you paid
20 with cash?

21 A. Sorry. Can you repeat the question?

22 Q. Sure. You mentioned earlier that you paid
23 some of the massage therapists with checks and some with
24 cash?

25 A. Yes, sir.

1 Q. Were there any general differences between
2 those massage therapists that you paid with checks and
3 those that you paid with cash?

4 A. No, sir. It was -- when I was there always
5 was a hundred dollars an hour rate. That was for
6 everybody.

7 Q. Did you ever hear Jeffrey Epstein talk about
8 his massages?

9 A. No, sir.

10 Q. At one point you said that you're not -- this
11 might be summarizing your testimony -- that you may not
12 be the best guesser of ages. Is that something that you
13 may have said earlier today?

14 MR. CRITTON: Form.

15 THE WITNESS: Yeah. Yeah. I think I -- you
16 can be thirties, twenties. I don't know.

17 BY MR. LANGINO:

18 Q. Do you have any children?

19 A. [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 Q. Are either of your children female?

23 A. No.

24 Q. [REDACTED]

25 A. [REDACTED]

1 Q. [REDACTED]

2 A. [REDACTED]

3 Q. Do you have any relative that you had spent a
4 significant amount of time with that would be a female
5 teenager?

6 MR. CRITTON: Form.

7 THE WITNESS: No, except my daughter.

8 BY MR. LANGINO:

9 Q. Cousin?

10 A. My daughter, no.

11 Q. Before when we first started speaking with
12 you, you talked a little bit about your business. Are
13 you still working?

14 A. No. [REDACTED]

15 Q. [REDACTED] is that correct?

16 A. Yeah. Yeah. It was my -- my -- it was me,
17 only me.

18 Q. [REDACTED]
19 [REDACTED]

20 A. [REDACTED]

21 Q. Are any of your children or any of your family
22 members [REDACTED]

23 A. No. They have their own business.

24 Q. You mentioned a few times today that you were
25 never told to check the identification of any of the

1 message therapists that came to give massages?

2 A. That's correct.

3 Q. How come you said that a couple of times
4 today?

5 MR. CRITTON: Form.

6 THE WITNESS: You asked me. They asked me. I
7 think I just answer questions.

8 BY MR. LANGINO:

9 Q. As you reflect back in your time working for
10 Mr. Epstein, today do you believe you turned a blind eye
11 to some of the ages of the women or females that worked
12 for Jeffrey Epstein with massages?

13 MR. CRITTON: Form.

14 THE WITNESS: Can you repeat the question?

15 BY MR. LANGINO:

16 Q. Sure. As you sit here today and reflect back
17 on your time working for Jeffrey Epstein, do you believe
18 you turned a blind eye or ignored, purposely ignored the
19 ages of the females that gave him massages?

20 MR. CRITTON: Form.

21 THE WITNESS: I don't know. I don't -- I
22 cannot -- I'm not a judge. I don't know. I don't
23 know. I don't think so. Sincerely, I don't think
24 so.

25 BY MR. LANGINO:

1 Q. When you were working for Mr. Epstein, did you
2 have any doubt that the girls who provided him massages
3 were not of the proper age or not older than 18 years
4 old?

5 MR. CRITTON: Form.

6 THE WITNESS: No.

7 BY MR. LANGINO:

8 Q. Did you keep up with Mr. Epstein's -- keep
9 informed of Mr. Epstein's criminal case while it was in
10 the paper?

11 A. Only what was on tv. What it was on tv,
12 that's how I found out.

13 Q. How do you feel about Mr. Epstein today?

14 A. I feel bad, sincerely I feel bad, because he
15 was -- with me, with my family, with my wife, he was a
16 very generous guy, extremely -- I don't know what the
17 word is in English -- but he would press for perfection.
18 I mean, and that was a very stressful job. But,
19 otherwise, I have no problems with him at all. And I
20 feel bad about it, what's happened in his life.

21 Q. Have you had any contact with Mr. Epstein
22 after you ended working there?

23 A. After I work -- after I end working with him?
24 Yes, I did.

25 When this case, when this criminal case

1 started, I got home and I had a card, a business card
2 from a police officer. I think it was [REDACTED] from the
3 Palm Beach Police Department.

4 And -- and I got scared. And I was trying to
5 find out what it's all about. Because it was an
6 occasion with Mr. Epstein that we had a disagreement.
7 We settled that. Everything was well and we went our
8 friendly ways and never heard from him again.

9 And I received this from the police department
10 that we need to talk to you. And, so, I got scared.
11 And I called the office in New York.

12 I says, I would like to speak to Mr. Epstein.

13 And he come on, and I said, I told him, I
14 says, Jeffrey, what's going on? What's happening? I
15 thought it was related to the problem that I had
16 personally with him settled.

17 And I says -- no, he says. And he says to me,
18 [REDACTED] it's nothing to do with that, has nothing to
19 do with it. I've been -- I don't know if he told me I
20 been sued or I been -- it's a problem with me, they're
21 investigating something and I cannot talk to you. That
22 was the end. And that's it.

23 Q. Any other conversations with Mr. Epstein --

24 A. No.

25 Q. -- since that conversation?

1 A. No.

2 Q. At some points you were caught stealing from
3 Mr. Epstein; is that true?

4 A. We settled with him as a borrowing money from
5 him. Okay?

6 MR. BERGER: As what?

7 THE WITNESS: Borrowing.

8 MR. LANGINO: Borrowing.

9 BY MR. LANGINO:

10 Q. When you took the money from Mr. Epstein, --

11 A. Yes, sir.

12 Q. -- did he give you permission to take that
13 money?

14 A. No.

15 Q. At any point did you take a firearm from
16 Mr. Epstein?

17 A. No.

18 Q. At any point did you enter Mr. Epstein's
19 property when you were not allowed to be there?

20 A. Yes.

21 Q. And was that the incident where you took some
22 money from him?

23 A. Yes.

24 Q. Can you explain to me how you and Mr. Epstein
25 came to an agreement that the cops would not be called?

1 A. He called me and he say, [REDACTED] we need to
2 talk.

3 I says, okay. Where?

4 And -- and we met at a luncheonette in Palm
5 Beach and we have a friendly conversation. He asked
6 about my kids, about my family.

7 Then -- is this related to Mr. Epstein's case?

8 Q. It is.

9 A. Because I prefer to keep this -- this -- I was
10 not incriminated. I was not -- I went to the police
11 department. I made my statement and there was no
12 charges filed.

13 I don't think I would like to continue with
14 this.

15 MR. CRITTON: Let me just put on the record as
16 I think it's completely irrelevant, immaterial,
17 it's not calculated to lead to the --

18 THE WITNESS: And it was after --

19 MR. CRITTON: Let me just finish putting my
20 objection on.

21 As I understand it, it occurred long before he
22 ever got the card from the police. I think you're
23 harassing him. I think you're trying to intimidate
24 him and I think it's inappropriate.

25 BY MR. LANGINO:

1 Q. How did you feel about Mr. Epstein being loyal
2 to you as an employee for him by not getting you into
3 further trouble with the police?

4 MR. CRITTON: Form.

5 THE WITNESS: I feel that it was part of a
6 relationship over 13 years that I did a lot of
7 extra work. And I was more or less says, hey,
8 [REDACTED] you did it for me, I do it for you. And that
9 was it. And we end up as friends. We did not
10 break it apart.

11 BY MR. LANGINO:

12 Q. As you sit here today, do you have a sense of
13 personal loyalty to Mr. Epstein?

14 A. No. No. Matter of fact, that job has left me
15 a lot of sequels, psychological problems. It was
16 extremely damaging to my marriage. Right after I left
17 we broke up with my wife. I walk away. I left my
18 house. I left my family. I end up with a woman that
19 she need the money and that's why I went in there and
20 got the money.

21 And that's what I think you wanted to hear.
22 And I want to end it there.

23 I have no -- nothing -- I think my stay there,
24 in reflecting the job, I was not paid well enough for
25 what we did. And too late now.

1 Q. The overall theme of my question is: The fact
2 that Mr. Epstein chose not to get you in trouble with
3 the police further, trouble with the police --

4 A. Uh-huh.

5 Q. -- so many years ago, has today that caused
6 you or pressed upon you to maybe soften your testimony
7 or change your testimony at all?

8 A. Absolutely not.

9 Q. Have you ever spoken with any independent
10 investigators regarding the actions, the criminal
11 actions that occurred at Jeffrey Epstein's home?

12 A. Yes.

13 Q. When did that occur?

14 A. Right after I receive a card from the police
15 department, when I call Jeffrey and I ask him, what's
16 going on?

17 He says, I cannot talk to you. Somebody will
18 talk to you.

19 And then I got a call from this guy that I
20 cannot recall his name now. Talked to me and we met at
21 Carabbas. And we talked -- what? -- about 15 minutes.
22 And he asked me questions just like you guys are asking
23 me and I says exactly the same answers.

24 And he says, well, there's an investigation
25 against Jeffrey. You has nothing to do with it. You

1 have nothing to do, nothing to worry about it, but if
2 you want to hire a lawyer to protect yourself.

3 And I asked -- my question to him was, I don't
4 want to get incriminated into something that you know.
5 somebody trying to incriminate me for -- for my job.

6 And he says, no, no, no. But if you want to
7 get a lawyer, that's fine.

8 And that's where I got Mr. Murrell and he just
9 came to us, to sign this, to -- that was the end of it.

10 Q. Who got Mr. Murrell for you?

11 A. Who got it? Mr. Epstein.

12 Q. When you met with this investigator at
13 Carabbas, --

14 A. Yes.

15 Q. -- did he record your conversation --

16 A. No.

17 Q. -- in any way?

18 After this meeting at Carabbas, did you meet
19 with any other investigators?

20 A. No.

21 Q. After -- during your inspection of the massage
22 room after these massages had been completed with
23 Mr. Epstein, --

24 A. Uh-huh.

25 Q. -- do you remember seeing any -- anything that

1 you would describe as blood?

2 A. No, never.

3 Q. Do you remember seeing anything that you would
4 describe as a sexual fluid?

5 A. No, never.

6 Q. When you worked for Jeffrey Epstein, the woman
7 that you were married to, what is her name or -- what is
8 her name?

9 A. The woman that I was married to?

10 Q. I think -- the reason I'm asking is because
11 earlier today when you first spoke, I thought I
12 remembered you saying that you -- both you and your
13 wife --

14 A. That's my --

15 Q. -- worked for Mr. Epstein?

16 A. It's still my wife. It's still my wife. We
17 didn't -- we got two ways away from a divorce and the
18 lawyers were taking my money by pipeline.

19 Q. And what is her name?

20 A. And we decide not to divorce and we still
21 together.

22 Q. Sorry. I missed that. But what is her name?

23 A. [REDACTED]

24 Q. Let me just look through my notes to see if I
25 have any other questions.

1 A. Okay.

2 Q. Thank you very much.

3 A. Welcome.

4 CROSS EXAMINATION

5 BY MR. MERMELSTEIN:

6 Q. Good afternoon, [REDACTED]

7 A. Yes, sir.

8 Q. My name is Stuart Mermelstein. I represent a
9 group of the Plaintiffs in these cases and I have some
10 questions for you as well.

11 Your wife, [REDACTED] does she live at the same
12 address as you now?

13 A. Yes, she does.

14 Q. Now, when you began working full time for
15 Mr. Epstein, I believe you said that was around 1991; is
16 that correct?

17 A. Yes.

18 Q. Was your wife, was she hired at the same time
19 as you?

20 A. No. She was hired three years after.

21 Q. And how did that come about that your wife was
22 hired?

23 A. My wife was hired because we had a housekeeper
24 that she was doing the cleaning and she left. Then we
25 had another housekeeper, Polish girl, and she left.

1 And then by that time my kids went to college
2 and my wife was at home. And I suggest my wife to come
3 to work with me, to help me.

4 Q. So you recommended to Mr. Epstein that he hire
5 your wife?

6 A. Yes.

7 Q. And he did?

8 A. Yes, he did.

9 Q. And what were her job duties there?

10 A. Her only job duties were shopping, basically
11 the shopping, getting movie tickets, show tickets, buy
12 books, bring the food to Mrs. Epstein's -- Mr. Epstein's
13 mother, sometimes drive Mrs. Epstein to the doctors.

14 She was not involved -- and sometimes she did
15 some cleaning for me.

16 Q. Did she live with you in the upstairs
17 apartment?

18 A. Most of the nights we had an apartment right
19 across the bridge on Flagler that it was my -- my
20 property. And we had an apartment there.

21 So she went home. She didn't like to stay
22 there. But I had to stay there because my job starts
23 from 5:00 in the morning to 10:00 at night

24 Q. And did [REDACTED] leave her employment the same
25 time as you?

1 A. Yes, we did at the same time.

2 Q. You testified that you would come into the
3 bedroom and clean up after massages; is that correct?

4 A. That's correct.

5 Q. Did you -- were there occasions where you had
6 your wife help you with that?

7 A. No. No.

8 Q. Were there -- did she have occasion to go into
9 the master bedroom?

10 A. It was occasions before that she will help to
11 set up the tables once in a while, set up the oils and
12 the tables. But I will do the clean up after.

13 Q. Is there a reason for that?

14 A. I was more involved into the final appearance
15 of the house. And it was my responsibility to make sure
16 that every room was perfect after they left and before
17 they went to bed.

18 Q. Was there anyone else who assigned your wife
19 work other than you?

20 A. No. Ms. Maxwell, sometimes she would tell my
21 wife, go buy some stuff, go get this and go get that.
22 She was mostly -- my wife was mostly out of the house.
23 She was -- this house was Mr. Epstein would says, go get
24 me this book, go get me this magazine, go get me
25 tickets, movie tickets for this show and this show and

1 this show. And she would have to travel -- and I was on
2 the phone with my wife constantly, buy this, get this,
3 get this -- and the food, and the food because it was a
4 five-star hotel.

5 Q. Did Ms. Maxwell or Mr. Epstein ever instruct
6 your wife to do housecleaning tasks?

7 A. No. I was blamed for everything.

8 Q. You were blamed for everything?

9 A. I was blamed for the good and the bad.

10 Q. Did you -- during the time your wife was
11 there, did you also have a hired housekeeper?

12 A. We have a crew of housecleaners. We have a
13 crew of people that would come to the house and do a
14 serial -- I mean, deep cleaning, you know, to the house.

15 Q. Was that every day?

16 A. Once a week -- no, it was twice a week. It
17 was Tuesday and Fridays.

18 It depends on Mr. Epstein's schedule because
19 he didn't -- he didn't want nobody at the house while he
20 was at the house. So we have to rearrange days for the
21 clean-up crew to come in. And I usually did that. As
22 soon as they left I bring the cleaning crew, get the
23 house ready and -- and get set for them for the next
24 trip.

25 Q. Did you have a housekeeper who did

1 housekeeping tasks on an everyday basis while you were
2 employed there?

3 A. No.

4 Before my wife went in?

5 Q. No. After your wife.

6 A. No. No. Not a full-time housekeeper.

7 Q. But you said your wife was hired after the
8 housekeeper left?

9 A. Yes.

10 Q. But -- so the person who left before your wife
11 came, was she doing housekeeping chores?

12 A. Yes, she was doing the housekeeping chores.

13 Q. Well, who did it then after your wife became
14 employed there, because she wasn't doing the
15 housekeeping?

16 A. I was. I was doing it and then we hire people
17 for to help us.

18 Q. So you were the main person doing the
19 housecleaning?

20 A. Yeah.

21 Q. And during -- between that time that your wife
22 started and when you left the employment, was there a
23 separate housekeeper employed during that time?

24 A. No. Full time? No.

25 Q. Full-time housekeeper?

1 A. No.

2 Q. What about a part-time housekeeper?

3 A. No. Like I told you, daily basis we call this
4 company. And then they will come in with four or five
5 girls and clean the whole house.

6 Q. This is the crew you were talking about?

7 A. The crew.

8 Q. But the crew didn't come when Mr. Epstein was
9 there?

10 A. Right.

11 Q. So on an everyday basis when Mr. Epstein was
12 there, you were the only person who was cleaning?

13 A. Me -- yeah, or my wife will help.

14 Q. At your instruction?

15 A. That's right.

16 Q. But you don't ever remember her cleaning up
17 after massages?

18 A. No. No.

19 Q. Is it possible that you instructed her to
20 clean up?

21 A. It's possible, but --

22 MR. CRITTON: Form. Asking him to speculate.

23 BY MR. MERMELSTEIN:

24 Q. You can answer.

25 A. It's possible.

1 Q. When girls would come to give a massage, where
2 would they come in the house? Would they come to the
3 front door?

4 A. Mostly came to the back kitchen door.

5 Q. The back kitchen door?

6 A. Uh-huh.

7 Q. Okay. And is there a bell there? Would they
8 knock or how would they --

9 A. There's a door bell.

10 Q. A door bell? They would ring the door bell?

11 A. Uh-huh.

12 Q. And who generally would answer the door?

13 A. Me or my wife.

14 Q. So you would let them in?

15 A. Uh-huh.

16 MR. CRITTON: Stuart, can I just ask you? You
17 use the term, girls. I assume you just mean, that
18 means female woman. It can mean anything? It has
19 no age bracket to it?

20 MR. MERMELSTEIN: That's correct. I'm not
21 referring specifically to ages right now.

22 THE WITNESS: No.

23 BY MR. MERMELSTEIN:

24 Q. So as I understand it, the girl would come to
25 the kitchen entrance, which is the service entrance,

1 correct?

2 A. Uh-huh.

3 Q. You have to say yes or no.

4 A. Yes, sir.

5 Q. If you answer uh-huh, that's not clear, so you
6 have to answer yes or no.

7 A. Okay.

8 Q. And you would typically open the door?

9 A. Yes, sir.

10 Q. And what would happen then?

11 A. Then I will keep her in the kitchen and go to
12 Mr. Epstein and find out where they want to have the
13 massage, or if it was for him or for Ms. Maxwell. And I
14 immediately, if they were repeat girls that are -- they
15 will know exactly where to go. And I will go up with
16 them, set the tables, and they will wait for him or her
17 to go in the room and they sit there until they come up.

18 Q. So did you generally already know that they
19 were coming at the time that they knocked on the door?

20 A. Yes, uh-huh.

21 Q. So you had an appointment schedule?

22 A. Yeah. Because most of the times I was doing
23 the calling, you know. I called J., come in at 3:00
24 this afternoon. And she will told me, no, I cannot, get
25 somebody else. And I knew it the time they were coming.

1 So I was expecting them most of the time.

2 Q. So you would expect them, they would come in
3 and then you would escort them upstairs?

4 A. Uh-huh.

5 Q. So --

6 A. I'm sorry, sir.

7 Q. Yes?

8 A. Yes.

9 Q. But first you would find Mr. Epstein and check
10 to see if he's ready or find Ms. Maxwell to check to see
11 if she's ready?

12 A. Yes.

13 Q. And which staircase would you -- would you
14 take them up?

15 A. Either way.

16 Q. You would take them either the main staircase
17 or the servant staircase?

18 A. Yes.

19 Q. Why would you take the main staircase, since
20 you're already in the kitchen?

21 A. That's what I says, either way. We can go
22 through the main staircase or we go to the kitchen
23 staircase. So we use both.

24 Q. Okay. Well, I'm talking specifically to
25 escort a girl upstairs.

1 A. I escort the girls up there either way, both
2 ways.

3 Q. And, so, when you walked to the upstairs
4 bedroom, let's take the example of when Mr. Epstein is
5 getting a massage?

6 A. Yes.

7 Q. Mr. Epstein wouldn't be up there yet; is that
8 correct?

9 A. That's correct.

10 Q. He would be downstairs somewhere?

11 A. Uh-huh.

12 Q. Would there be a place --

13 MR. CRITTON: Form.

14 BY MR. MERMELSTEIN:

15 Q. -- where he would normally be while, you know,
16 he's waiting for the massage to be set up and ready?

17 A. Yes.

18 Q. Where is that? Where would he be?

19 A. Either at his desk or the pool house.

20 Q. And those were on the first floor?

21 A. Yes.

22 Q. And, so, when you arrived at the top of the
23 stairs with the girl for the massage, what would you do
24 then?

25 A. Go back to my duties.

1 Q. You would just leave? Would the massage table
2 already be set up?

3 A. He knew already that the girls -- the girl
4 went upstairs and it was up to him to come up.

5 Q. Did you have conversations with any of these
6 girls?

7 A. Sometimes.

8 Q. What kind of things would you talk about?

9 A. Regular things. Nothing that I can remember.
10 Nothing. Just...

11 Q. Did any of them ever tell you their ages?

12 A. No, sir.

13 Q. Did any of them ever assure you that they were
14 18?

15 MR. CRITTON: Form.

16 BY MR. MERMELSTEIN:

17 Q. Or over?

18 A. No, sir.

19 Q. No one ever mentioned anything about age?

20 A. No, sir.

21 Q. How did the girls appear to you? Did they
22 appear to be very young?

23 MR. CRITTON: Form.

24 THE WITNESS: Again, the same question you ask
25 me. Everybody ask me the same thing. They could

1 have been 16 or 20. Most of them were, I would
2 says, over 20. And some woman, it was over 60.
3 And one time she came to the door. The husband was
4 waiting outside. And Ms. Maxwell saw this woman,
5 that somebody recommend her. And Maxwell says to
6 me, [REDACTED] you have to find an excuse. We don't
7 want her.

8 So I had to pay this woman and find an excuse
9 that they going to have to go. And she -- they
10 never had a massage with her.

11 But there was -- most of them were womans.
12 They were not girls.

13 BY MR. MERMELSTEIN:

14 Q. So the woman who was over 60 was sent away;
15 she was rejected, correct?

16 MR. CRITTON: Form.

17 THE WITNESS: It was -- I was told to send her
18 away.

19 BY MR. MERMELSTEIN:

20 Q. And it was your understanding when you were
21 told to send her away, it was because of her age,
22 correct?

23 MR. CRITTON: Form.

24 THE WITNESS: I don't know. I don't know. I
25 was told to send her away.

1 BY MR. MERMELSTEIN:

2 Q. What was your understanding as to why they
3 were sending her away?

4 MR. CRITTON: Form. Asked and answered nine
5 times now.

6 MR. MERMELSTEIN: He hasn't -- he hasn't
7 answered my question yet.

8 MR. CRITTON: He has.

9 MR. MERMELSTEIN: Go ahead.

10 THE WITNESS: Why?

11 BY MR. MERMELSTEIN:

12 Q. Please answer the question.

13 A. Can you repeat the question?

14 Q. What was your understanding as to why they
15 sent her away?

16 MR. CRITTON: Form.

17 THE WITNESS: My understanding was either they
18 were busy or they didn't want her.

19 BY MR. MERMELSTEIN:

20 Q. What was your understanding as to why they
21 didn't want her?

22 MR. CRITTON: Form. Harassing.

23 THE WITNESS: I don't know. I didn't -- I
24 didn't make too much of it.

25 BY MR. MERMELSTEIN:

1 Q. But every other woman or female who came over
2 to give a massage was much, much younger, correct?

3 A. Yes.

4 Q. So this 60 year old woman was a significant
5 exception, correct?

6 MR. CRITTON: Form. Argumentative.

7 BY MR. MERMELSTEIN:

8 Q. You can answer.

9 A. I don't know how to answer that question. You
10 ask me to --

11 Q. Let me ask you this.

12 MR. CRITTON: Why don't you let him answer the
13 question before you interrupt him.

14 BY MR. MERMELSTEIN:

15 Q. All right. Go ahead. Please answer. It
16 didn't look like you were --

17 A. I don't know how to answer that question, you
18 asking me what is your opinion of that.

19 And I told you, my opinion of that, either
20 they saw the girl -- I don't think Mr. Epstein ever saw
21 the woman. But Ms. Maxwell saw the woman in the
22 kitchen. And she told me, [REDACTED] pay her and send her
23 away.

24 Q. Okay.

25 A. That was it.

1 Q. So Ms. Maxwell looked at the woman?

2 A. Right.

3 Q. Did she have a conversation with her?

4 A. No.

5 Q. She just looked at her and then said to you to
6 send her away, correct?

7 A. Yeah. Pay her and send her away.

8 Q. Do you recall seeing women who came to give
9 massages who were in their 50s?

10 A. Yes.

11 Q. There were women in the 50s?

12 A. Yes.

13 Q. How often did that happen?

14 A. Not too often, but it was -- it was woman that
15 they were in the 50s. I says, again, could have been
16 49, 45. I don't know. I don't know the ages, but it
17 older woman.

18 Q. How many middle-age women do you recall coming
19 over to give massages?

20 MR. CRITTON: Form.

21 THE WITNESS: I don't remember how many, but I
22 would says [REDACTED]

23 [REDACTED] was, I would says, in the 40s. And she
24 came very, very often. And I understand she was a
25 massage specialist and a yoga instructor, too, at

1 the same time.

2 So that was one of -- and there was another
3 woman that she was supposed to be a teacher at the
4 school of massage therapy that I can't remember her
5 name. But that's it. I mean...

6 BY MR. MERMELSTEIN:

7 Q. So those two you remember who were older?

8 A. Two. And it was a couple guys that were older
9 that -- some guys that were older, too, guys.

10 Q. Did Mr. Epstein ever have massages done by
11 men?

12 A. Yes

13 Q. And did Mr. Epstein ever have massages done by
14 these older women?

15 A. Yes.

16 Q. When you escorted the female in this case for
17 the massage to the upstairs bedroom -- correct? -- you
18 would then leave?

19 A. Yes.

20 Q. You would then walk back downstairs?

21 A. Yes.

22 Q. Correct?

23 And would you then -- would you -- you had
24 already told Mr. Epstein that she's there, correct?

25 A. That's correct.

1 Q. And at some point later then Mr. Epstein would
2 come upstairs, correct?

3 A. That's correct.

4 Q. And where would you go?

5 A. To my duties, to the kitchen or to my office.

6 Q. And I think you testified earlier that the
7 doors of the bedroom would be closed during this
8 massage?

9 A. He would close the door.

10 Q. So Mr. Epstein, when he would arrive upstairs,
11 would close the door?

12 A. Yes, sir.

13 Q. And about how long would the massage last
14 generally?

15 A. Usually an hour.

16 Q. And what would happen at the end?

17 A. They would come down. Most of the repeat
18 girls, they would bring the towels themselves and dump
19 it by the kitchen by the laundry room we had there, in
20 order to help us. Other girls, they just left it up
21 there and they would come down.

22 Either Mr. Epstein will pay or I will pay
23 them.

24 Q. Did they --

25 A. Or Ms. Maxwell will pay them.

1 Q. Did Mr. Epstein walk down with the girls or
2 did he stay upstairs?

3 A. Sometimes, sometimes no. Sometimes he took a
4 nap or he took a shower. I don't know what they did in
5 the room. I don't know. I don't know. Sometimes he
6 went down right away. Sometimes he stay up there.

7 Q. So when they came down, they would go to the
8 kitchen; is that correct?

9 A. Yeah, most of it.

10 Q. And were you there waiting for them or did you
11 have --

12 A. My office was right next to the kitchen, so I
13 was there -- and the kitchen was the focal point of the
14 house basically. So they have to go to the kitchen
15 either to get pay or to go to their cars.

16 Q. Did you converse with any of the girls when
17 they came down after the massage?

18 A. Very little. Very little.

19 Q. Did you ever observe a girl who appeared
20 upset, surprised, shocked, anything of that nature when
21 they came down?

22 A. Never. Never.

23 Q. And sometimes you would pay them, correct?

24 A. That's correct.

25 Q. How much would you --

1 A. A hundred dollars a massage.

2 Q. A hundred dollars a massage? Were there ever
3 any exceptions?

4 A. That's the -- I never pay any more than a
5 hundred dollars per massage.

6 Q. Were there times when two girls came?

7 A. Two girls came at the same time?

8 Q. Correct.

9 A. Yeah. There were times when two girls come in
10 at the same time and one will go to one room, the other
11 will go to the other room. Or one -- I would set up two
12 tables in his room or I will ask him, where you want to
13 set the massages? He will told me, set in the blue room
14 and set them in my room. Or set them in Ghislaine's
15 room and the red room, depends on who people were there.
16 But there were times where two of the girls at the same
17 time, yes.

18 Q. Was there ever occasions where there was a
19 girl who waited downstairs while one -- while the other
20 girl went upstairs?

21 A. No.

22 Q. That never happened?

23 A. I cannot remember.

24 Q. Was there ever an occasion where you paid a
25 girl who waited and didn't actually give a massage?

1 A. No.

2 Q. That never happened?

3 A. Never happened.

4 Q. You mentioned that Mr. Epstein put you in
5 contact with Mr. Murrell; is that correct?

6 MR. CRITTON: Form.

7 THE WITNESS: Not Mr. Epstein.

8 BY MR. MERMELSTEIN:

9 Q. Huh?

10 A. It wasn't Mr. Epstein.

11 Q. Mr. Epstein's investigator put you in contact
12 with Mr. Murrell?

13 A. That's correct. He gave me his name.

14 Q. And did you pay Mr. Murrell out of your own
15 pocket?

16 A. No, I didn't pay nothing.

17 Q. Who is -- what was your understanding as to
18 who was paying for Mr. Murrell?

19 A. I don't know. I don't know who was paying for
20 it.

21 Q. You never asked Mr. Murrell who was paying his
22 bill?

23 A. No, he never send me a bill.

24 Q. Did you think that Mr. Murrell was doing it
25 for free?

1 A. I don't know.

2 Q. You don't know. As far as you know,
3 Mr. Murrell could have been providing you legal services
4 for free?

5 A. No, I don't think it was provided me for free.
6 I don't think he ever -- that question ever come out of
7 Mr. Murrell. I was in Mr. Murrell's office for about
8 ten minutes.

9 And he says, well, I meet you tomorrow
10 there -- and that's it -- in order to protect you so
11 they don't incriminate you in any way. We left it at
12 that. He never send me a bill. He never send me -- I
13 never talk to Mr. Murrell again, never saw him again.

14 Q. And you never had any kind of understanding
15 with him as to how --

16 A. No.

17 Q. -- how his bill was going to be paid?

18 A. No.

19 Q. Did you sign any kind of what we call, a
20 retainer agreement, anything where you hired him?

21 A. No.

22 MR. CRITTON: Just so you know, you have an
23 attorney -- nobody's going to tell you this
24 apparently.

25 You have an attorney/client privilege. Any

1 conversation that you had with Mr. Murrell, you and
2 your wife, is completely protected, as long as you
3 want to assert that privilege.

4 You can either assert it or not assert it.
5 That's your right. But nobody's apparently going
6 to tell you that, at least Mr. Mermelstein is not
7 going to tell you that.

8 MR. MERMELSTEIN: Well, I was trying to
9 avoid --

10 MR. CRITTON: Well, you're asking questions of
11 what he said.

12 MR. MERMELSTEIN: I'm not asking them what
13 they said.

14 MR. CRITTON: Same thing.

15 MR. MERMELSTEIN: I'm asking him how he got
16 paid.

17 MR. CRITTON: No, you were -- read back your
18 questions where you were.

19 Anyhow, that's a right you have, so...

20 So much for the law.

21 MR. MERMELSTEIN: I was not asking him what
22 was said during any conversation. I asked him if
23 he signed a retainer. That's a fair question.

24 BY MR. MERMELSTEIN:

25 Q. Do you remember a girl who came to give

1 massages there by the name of [REDACTED] Does that name
2 sound familiar at all?

3 A. No.

4 Q. Do you remember an A.?

5 A. No.

6 Q. What about a [REDACTED] Do you remember anyone by
7 the name of [REDACTED]?

8 A. No.

9 Q. Was it frequent that girls would come just
10 once and not appear again?

11 A. Frequently.

12 Q. These girls that would come, would they come
13 with their own equipment or supplies?

14 A. No. Some girls, they come in with a table,
15 the new girls they come in with a table. And I would
16 told them, no, you don't need the table. They will
17 leave it in the kitchen because we have tables in every
18 room in the house.

19 Q. Some of the girls, the first time they came
20 they didn't have anything, right?

21 A. They come with that table, one of the tables
22 they hang it in the shoulders, portable tables. But we
23 didn't have portable tables in the room. They were all
24 custom-made tables.

25 Q. Did some girls come without -- for the first

1 time without any supplies at all, whether equipment or
2 lotions or anything of that nature?

3 A. Probably.

4 Q. Did you have a question in your mind as to
5 whether they were professional at this business?

6 A. No.

7 Q. At massaging?

8 A. No.

9 Q. Why not?

10 A. It was not my job.

11 MR. CRITTON: Form.

12 BY MR. MERMELSTEIN:

13 Q. You just didn't think about it?

14 MR. CRITTON: Form.

15 THE WITNESS: If I was told that a girl is
16 coming, my job was to open the door, let her in and
17 let Mr. Epstein decide where he wants his massage.
18 And that was the end of it.

19 BY MR. MERMELSTEIN:

20 Q. Are you aware that sexual conduct between an
21 adult male and an underage female is criminal; it's
22 against the law?

23 MR. CRITTON: Form.

24 THE WITNESS: Of course I do.

25 BY MR. MERMELSTEIN:

1 Q. Did you have any concerns while you were
2 working there that criminal acts were occurring with the
3 girls who were coming to the door?

4 MR. CRITTON: Form.

5 THE WITNESS: I had no idea what was going on
6 between them.

7 BY MR. MERMELSTEIN:

8 Q. Let me just give you some other names. Tell
9 me if you recognize any of these names.

10 [REDACTED]

11 A. (Nods head.)

12 Q. Name does not ring a bell?

13 A. (Nods head.)

14 MR. CRITTON: You have to answer out loud.

15 BY MR. MERMELSTEIN:

16 Q. You need to say yes or no.

17 A. No.

18 Q. [REDACTED]

19 A. Can you repeat that?

20 Q. [REDACTED] would be the first name. [REDACTED] would be the
21 second name?

22 A. No.

23 Q. [REDACTED]

24 A. No.

25 Q. [REDACTED]

1 A. No.

2 Q. [REDACTED]

3 A. No. None of those girls' --

4 Q. None of those girls ring a bell at all?

5 A. -- name familiar to me.

6 Either they came one time, one day and they
7 didn't even told me their names or -- or he paid for it
8 that I don't have -- but none of those names sound
9 familiar to me.

10 Q. You testified that there were -- about the sex
11 toys that you would pick up after -- after there were
12 massages, correct?

13 MR. CRITTON: Form.

14 BY MR. MERMELSTEIN:

15 Q. The vibrators, correct?

16 MR. CRITTON: Form.

17 BY MR. MERMELSTEIN:

18 Q. You can answer.

19 A. Yes.

20 Q. And you mentioned there was a basket with
21 these vibrators or toys in them, correct?

22 A. Yes.

23 Q. Where was the basket kept?

24 A. In Ms. Maxwell's closet.

25 Q. And that was in the master bedroom?

1 MR. CRITTON: Form.

2 BY MR. MERMELSTEIN:

3 Q. Or off the master bathroom?

4 A. Her bathroom.

5 Q. Huh?

6 A. Her bathroom.

7 Q. And the closet was -- the entrance to the
8 closet was in her bathroom?

9 A. That's correct.

10 Q. And it was a portable basket, she could move
11 it around, correct?

12 A. Uh-huh.

13 Q. You have to say yes or no.

14 A. Yes, sir.

15 Q. And -- and that's where the, I think you used
16 the word dildo, correct? That's where they were
17 located?

18 A. Yes, sir.

19 Q. Was there occasions where you would -- the
20 dildo, one or more dildos would be out and you would
21 clean them up after a massage that only Mr. Epstein had,
22 not Ms. Maxwell?

23 A. It was -- I will says that it was about three
24 or four occasions that I had to take this dildos and put
25 it back where they supposed to be. And I took it with

1 gloves and towels and stick it in the sink and throw it
2 in there.

3 Sometimes Ms. Maxwell will have a massage.
4 And sometimes I find it after she's supposed to have a
5 massage, those things. And also when Mr. Epstein had
6 the massage. So I don't know who use it on who.
7 Because sometimes they all disappear up there,
8 Mr. Epstein, Ms. Maxwell and whoever was up there.

9 Q. So as I understand it, you couldn't isolate a
10 particular instant where --

11 A. I cannot.

12 Q. -- Ms. Maxwell wasn't there, only Mr. Epstein
13 had gotten a massage and then you found the sex toys?

14 A. I cannot isolate that.

15 Q. But it's possible that either Mr. Epstein used
16 it or Ms. Maxwell used it; is that correct?

17 MR. CRITTON: Form. Form.

18 THE WITNESS: I have no idea to know.

19 MR. MERMELSTEIN: All right. I have nothing
20 further.

21 MR. BERGER: How about if we take a break?
22 Would you like a break for a couple minutes?

23 THE WITNESS: No, that's fine.

24 MR. BERGER: Mr. Willits, would it be possible
25 if I could sit there, because I've got a couple

1 Exhibits I'm going to show him?

2 MR. WILLITS: Sure.

3 MR. BERGER: Thanks.

4 CROSS EXAMINATION

5 BY MR. BERGER:

6 Q. Okay. Good afternoon, sir.

7 A. Afternoon, sir.

8 Q. My name is William J. Berger and I represent
9 three of the Plaintiffs in this case.

10 Did you ever hear of the name C., a young
11 woman named C.?

12 A. No, sir.

13 Q. How about a young woman named T.?

14 A. No, sir.

15 Q. Okay. You know, you've referred several times
16 to a falling out or a disagreement that you had with
17 Mr. Epstein?

18 A. Yes.

19 Q. Was that in -- was that the year that you left
20 his employment?

21 A. Right after -- right after I left.

22 Q. So you had a falling out with him after you
23 left his employment?

24 A. Yes.

25 Q. Well, why did you leave his employment?

1 A. Why?

2 Q. Yeah.

3 A. Because I was sick. I was extremely sick. I
4 was bleeding, internally bleeding, and I was bleeding
5 from my butt and I have fistulas in my colon. And I was
6 sick of the job and we had enough. We had good pay, but
7 we had enough of the job, especially because of
8 Ms. Maxwell's attitude towards us.

9 Q. Now, you said you had good pay, but we had
10 enough. What was your pay in 2002?

11 A. 2002, right before I left? I think it was 50,
12 either 55, something like that. And my wife was 30 or
13 35. I could be wrong.

14 Q. So you think that you were paid \$55,000 in
15 2002?

16 A. Uh-huh.

17 Q. Is that correct?

18 A. That's correct.

19 Q. And you believe your wife was paid how much?

20 A. Thirty, \$30,000.

21 Q. \$30,000 in 2002?

22 A. Uh-huh.

23 Q. Is that correct?

24 A. Yes, sir.

25 Q. How about 2001, what was your salary and your

1 wife's?

2 A. Same thing.

3 Q. Okay. And in 2000?

4 A. I was at the same. It never -- we never got
5 raises. We never got --

6 Q. I think you said at the very beginning --

7 A. Yes.

8 Q. -- of the deposition that you were paid 45,000
9 when you were first hired full time?

10 A. Yeah.

11 Q. In 2002, you were earning 55,000?

12 A. Uh-huh.

13 Q. So you did get some raise?

14 A. Yeah. In the matter of 11 years. Yeah, but
15 we didn't get a raise every six months or every year in
16 any specific date. And the raises were set by the
17 company. Automatically they would come from New York.
18 It was not a negotiate point between me and Mr. Epstein.

19 Q. And then you said earlier with me, you said we
20 had enough, you and your wife. You said, we had enough;
21 is that correct?

22 A. That's correct.

23 Q. What do you mean by that?

24 A. It was extremely stressful job. It was a lot
25 of pressure on us -- on me, on me -- I have to

1 correct -- on me. Everything was blamed on me. If a
2 chef cook a bad meal, it was my fault. And if the table
3 was not proper set royalty style, it was my fault. And
4 the hours were terrible, never have a holiday, Saturdays
5 and Sundays. We were working between 60 and 70 hours a
6 week. And my health was, I think, the most important
7 thing. And also the relation with my wife, it was a big
8 factor in us leaving the company.

9 Q. Now, you said that you were blamed for things?

10 A. Yes, sir.

11 Q. Who would blame you? Who is it that would say
12 that you were blamed?

13 A. I don't know who did the blaming, but I will
14 get my ass chewed out by Ms. Maxwell --

15 Q. She was the one?

16 A. Most of the times, yes.

17 Q. Who else did that?

18 A. Sometimes I had disagreements with him.

19 Q. "Him," being, who?

20 A. Mr. Epstein.

21 Q. About what?

22 A. Simple things. For me, it's stupid things,
23 nothing -- if this paper -- if this pencil was not put
24 in right there, they will complain.

25 Q. Okay. And is it correct that you left the

1 employment of Mr. Epstein in December of 2002? Does
2 that sound correct?

3 A. That's correct.

4 Q. And the -- now, were you arrested in 2003?

5 A. I was never arrested.

6 Q. You did speak to the police?

7 A. Yes.

8 Q. And you did have your statement taken at the
9 State Attorney's Office?

10 A. Yes.

11 Q. But you -- but that was by an Assistant State
12 Attorney, correct?

13 A. Yes.

14 Q. The questioning?

15 A. (Nods head.)

16 Q. Is that correct?

17 A. That's correct.

18 Q. You spoke separately with police officers
19 though, correct?

20 MR. CRITTON: Form.

21 BY MR. BERGER:

22 Q. In other words, the date of that statement is
23 in October of 2003; is that correct?

24 A. Yes.

25 Q. And by "that statement," I mean, the

1 transcript that I gave you earlier?

2 A. At what date, sir?

3 MR. MERMELSTEIN: 2005.

4 MR. BERGER: I'm sorry. You're correct.

5 Thank you. Sorry.

6 THE WITNESS: 2005.

7 MR. BERGER: In fact, let's -- Ms. Reporter,
8 would you mark the transcript if anybody needs it?

9 MR. CRITTON: It's Exhibit 2 now?

10 MR. BERGER: Is that how you're doing it, just
11 consecutively?

12 MR. CRITTON: Yeah, let's do it; otherwise,
13 it's going to be an awful mess, have five different
14 Exhibit number 1s by everybody.

15 (Exhibit number 2 was marked for
16 identification purposes.)

17 BY MR. BERGER:

18 Q. You see Exhibit 2? It's a transcript; is that
19 correct?

20 A. That's correct.

21 Q. Is that the transcript of the sworn statement
22 that you gave to the Assistant State Attorney in 2005?

23 A. Yes, sir.

24 Q. And during the lunch break, did you have an
25 opportunity to read it?

1 A. Yes, sir.

2 Q. And do you remember that you were placed under
3 oath when you gave that statement?

4 A. Yes, sir.

5 Q. And is everything that you say in here
6 truthful and correct?

7 A. As far as I know, yes, sir.

8 Q. Okay. Now, in connection with the incident in
9 October of 2003 involving Mr. Epstein's house and your
10 entering his house, that incident?

11 A. It was in October 2003?

12 Q. When do you remember that it was?

13 A. I can't remember.

14 Q. Okay. All right. You spoke with police
15 officers in connection with that though, correct?

16 A. I went to the Palm Beach Police Department.

17 Q. Why did you go to the --

18 A. I speak to one officer.

19 Q. And why did you go there?

20 A. Because Mr. -- when I spoke to Mr. Epstein and
21 we settle the dispute, Mr. Epstein says, you just need
22 to go to the police department and make a statement.

23 MR. WILLITS: Could I have Exhibit number 2,
24 please?

25 Thank you.

1 BY MR. BERGER:

2 Q. Let me see if I understand this correctly.

3 I think you testified earlier that you found a
4 card or you were given a card from a police officer; is
5 that correct?

6 A. That's correct.

7 Q. And as a result of that, you called
8 Mr. Epstein, correct?

9 A. That's correct.

10 Q. Before you got that card, did you have any
11 idea that the police were involved in your life?

12 A. No.

13 MR. CRITTON: Form.

14 BY MR. BERGER:

15 Q. And you called Mr. Epstein after you got that
16 card, correct?

17 A. Yes.

18 Q. Now, how did you get it? Was it mailed to
19 you?

20 A. No. It was putted in my door. I was not
21 home. And they went to my house and they left it in the
22 door.

23 Q. And did it have a note on it, please call?

24 A. Yes.

25 Q. Or was it just a card?

1 A. It was a -- it was a Palm Beach Police
2 Department, please call.

3 Q. Okay. And you didn't call though; you called
4 Mr. Epstein first, right?

5 A. Yeah. Because I was scared.

6 Q. Why were you scared?

7 A. Because I thought it was of the incident that
8 happens previously.

9 Q. And what was that incident?

10 A. You know that incident.

11 Q. I'd like to hear you describe it for me.

12 A. That incident is, I went to the house and I
13 got some money.

14 Q. What time of day did you go to the house?

15 A. Night.

16 Q. Was anybody home?

17 A. No.

18 Q. Where did you get the money?

19 A. Out of his bag.

20 Q. Out of his?

21 A. Bag.

22 Q. Bag. Briefcase? Bag?

23 A. Briefcase.

24 Q. Briefcase?

25 A. Yes.

1 Q. How did you -- did you know that there was
2 money in the briefcase?

3 A. Yes.

4 Q. How did you know that?

5 A. Because I replenish that case many times
6 before.

7 Q. Now, how many months after you left
8 Mr. Epstein's employment did this occur?

9 A. I don't have -- I would says, three to four
10 months.

11 Q. I would just ask a favor of you. The court
12 reporter needs to see your face so she can understand
13 what you're saying. She's looking -- you put your hand
14 in front of your mouth. That's all.

15 Now, when you worked for Mr. Epstein, did you
16 learn that he kept money in that briefcase?

17 A. Yes.

18 Q. And, so, when you went to his house on that
19 occasion, did you just assume that there would be money
20 in the briefcase?

21 A. Yes.

22 Q. And -- and did you take money out of that
23 briefcase?

24 A. Yes.

25 Q. Now, is that the only time that you took money

1 out --

2 A. No.

3 Q. -- of his briefcase?

4 A. It was twice.

5 Q. When was the other time?

6 A. Couple weeks before.

7 Q. What time of day was that?

8 A. At night.

9 Q. And how much did you take out the first time?

10 A. It was a total of \$6,300.

11 Q. That's for both times?

12 A. Yeah.

13 Q. Can you break them down?

14 A. I think one time was \$1,500. Another time was
15 the rest.

16 Q. Now, you left in December of 2002 and then
17 there were these two incidents that you just described?

18 A. Uh-huh.

19 Q. Did you have any contact with Mr. Epstein in
20 between leaving his employment and the first of these
21 two instances?

22 A. None.

23 Q. And as far as you knew, did anybody see you
24 take the money on either occasion?

25 A. None.

1 Q. And, so, when you saw the card from the
2 police, you assumed it had to do with these two
3 instances?

4 A. Yes, sir.

5 Q. And there was no other reason why you thought
6 it had to do with Mr. Epstein?

7 A. No, sir.

8 Q. And when you called him, did you discuss these
9 two incidents with him?

10 A. When I call Mr. --

11 Q. You said you got the card --

12 A. No.

13 Q. -- and then you called him?

14 A. No, we did not discuss that money or nothing
15 involved.

16 I ask him, what's going on, Jeffrey? What's
17 happening? I got this and I thought that this was all
18 over.

19 No, he says, [REDACTED] it has nothing to do with
20 that money.

21 Q. Did you ever read the incident report by the
22 police, the Palm Beach Police Department? Did you ever
23 read it?

24 A. No.

25 MR. CRITTON: Regarding what?

1 MR. BERGER: Regarding these incidents.

2 BY MR. BERGER:

3 Q. You never read it?

4 A. No.

5 Q. Let me hand you this.

6 MR. CRITTON: Is there an extra copy?

7 MR. BERGER: Yeah.

8 BY MR. BERGER:

9 Q. What I'm showing you, have you ever seen this
10 before?

11 A. No.

12 MR. BERGER: Let's have this marked as Exhibit
13 3, please.

14 MR. CRITTON: Can I keep this?

15 (Exhibit number 3 was marked for
16 identification purposes.)

17 BY MR. BERGER:

18 Q. It appears to be about 20 pages and it has,
19 Palm Beach Police Department Incident Report, on the top
20 page.

21 Turn to the third page.

22 And you see where it starts the narrative, the
23 paragraph? Do you see where that starts?

24 A. Yes, sir.

25 Q. And it says: "On Sunday, October 5, '03 at

1 approximately 8:24 hours, I was dispatched to a burglary
2 at 358 El Brillo Way."

3 Do you see that?

4 A. Yeah.

5 Q. Now, October 5, 2003, do you recall that that
6 was about when the time you took the money from
7 Mr. Epstein's briefcase was?

8 A. Yes. I don't recall. But if they say it, I
9 have to agree with it.

10 Q. Well, you left in December of 2002. And
11 before I showed you this document, you said that these
12 incidents occurred about three or four months later. So
13 apparently they occurred more than three or four months
14 later; is that correct?

15 A. Apparently, yes.

16 Q. Well, now after -- after looking at this, sir,
17 do you actually recall that it occurred more than three
18 or four months later?

19 A. After looking at this?

20 Q. Yeah.

21 A. It could be.

22 Q. But do you actually remember it being more
23 than three or four months?

24 A. I don't remember if it was more than three
25 months.

1 Q. Okay. Okay. Now, if you look further down,
2 you'll see it says, quote, Epstein further advised a
3 black Glock handgun was taken from the book shelf
4 located behind the desk, unquote.

5 Do you see that?

6 A. Yes.

7 Q. Did you take a black Glock handgun from him?

8 A. Absolutely not.

9 Q. Do you know if anybody did?

10 A. No, sir.

11 Q. Is this the first time that you ever heard
12 that Mr. Epstein may have told the police --

13 A. No. This question I was asked by the police.

14 Q. Okay. Now, you see the next sentence? It
15 says: "Epstein advised he suspected cash had been taken
16 from his briefcase on two other occasions while he was
17 in town for the weekend. The first was over the Labor
18 Day weekend, August 30 to September 1. The second time
19 was a weekend in mid-September 2003."

20 Do you see --

21 A. Yeah.

22 Q. -- the mention of those two incidents?

23 A. Uh-huh.

24 Q. Yes?

25 A. Uh-huh.

1 Q. You've got to say yes or no.

2 A. Yes, sir.

3 Q. Now, look up at the top of that paragraph.

4 You see where it says: "After" -- it's about the fourth
5 sentence -- "Epstein advised that on Saturday evening,
6 October 4, 2003, he left his briefcase at his desk and
7 went to bed at approximately 12:30 a.m. Epstein said
8 when he left his briefcase, it contained approximately
9 \$5,000 U.S. currency."

10 A. Uh-huh.

11 Q. Do you see that?

12 A. Yes.

13 Q. And then it goes further on, it says -- after
14 a sentence or two, it says: "Epstein stated at
15 approximately 7:15 hours on Sunday, October 5, 2003,
16 while sitting at his desk, he noticed the briefcase had
17 been opened and some of the cash was missing. Epstein
18 believed approximately \$3,500 was taken from the
19 briefcase."

20 Do you see that?

21 A. Yes.

22 Q. Now, when you read this whole paragraph here,
23 do you agree that Mr. Epstein is -- and assuming that
24 the police took this down accurately -- that Mr. Epstein
25 is describing three separate instances --

1 A. No.

2 Q. -- where he believes money was taken?

3 MR. CRITTON: Form.

4 THE WITNESS: I don't agree with this.

5 BY MR. BERGER:

6 Q. No?

7 A. No.

8 Q. Well, he says: "The first" -- at the bottom,
9 it says: "The first was over Labor Day weekend, August
10 30 to September 1, 2003."

11 You see it says that at the bottom? The very
12 bottom.

13 "The first was over Labor Day weekend,
14 August 30 to September 1, 2003."

15 Do you see that?

16 A. Uh-huh.

17 Q. Yes or no?

18 A. Yes.

19 Q. And then it says: "The second time was a
20 weekend in mid-September 2003."

21 Do you see that?

22 A. Yes.

23 Q. And then above, do you see where he talked
24 about October 4, 2003? You see mention of that? Or
25 October 5, 2003?

1 A. Right here.

2 Q. Right in the middle, it says: "Epstein stated
3 at" -- yes.

4 A. No. I don't agree with this. I never saw
5 this.

6 Q. I'm not asking -- that's not what I'm asking.
7 What I'm saying, sir, do you see though that
8 the police report refers to three instances; is that
9 correct?

10 A. No.

11 Q. Okay. But it's correct that the police report
12 refers to three instances, correct?

13 MR. CRITTON: Form.

14 BY MR. BERGER:

15 Q. The police talk about three instances, right?

16 A. That's correct.

17 MR. CRITTON: Form.

18 BY MR. BERGER:

19 Q. Now, how many times did you take cash from
20 Mr. Epstein?

21 A. Twice.

22 Q. So do you have any idea what he's talking
23 about here?

24 A. No.

25 Q. Now, the first time that you took cash, was it

1 on August 30 to September 1, 2003?

2 A. I can't remember.

3 Q. Or September -- mid-September 2003?

4 A. I can't remember.

5 Q. Okay. Is the third incident accurate where it
6 talks about October 5 or October 4, 2003?

7 A. I don't know if it's accurate or not, but I
8 know that I went to the house twice.

9 Q. Not three times?

10 A. Not three times.

11 Q. Any idea why Mr. Epstein would talk about
12 three times?

13 A. No idea, sir.

14 Q. And any idea why he would talk about a Glock
15 handgun?

16 A. No, sir.

17 MR. CRITTON: Form.

18 BY MR. BERGER:

19 Q. Now, you said that -- that you had a -- okay.
20 I've put this aside. I'm going to ask you another
21 question, so why don't you -- I don't want to distract
22 you.

23 Now, you said that your disagreement or your
24 falling out with Mr. Epstein was after you left his
25 employment. Do you remember saying that?

1 A. Yes. After -- after this incident.

2 Q. And what did that disagreement have to do
3 with? Did it have to do with these incidents?

4 A. Of course. I screw it up.

5 Q. Okay. And do you know who Mr. Adam Fetterman
6 is?

7 A. Yes.

8 Q. Who is he?

9 A. He's my lawyer.

10 Q. And did Mr. Epstein pay for Mr. Fetterman's
11 legal services for you?

12 A. No. I pay on my own pocket.

13 Q. Now, let me ask you some questions about some
14 property in Palm Beach County, [REDACTED]

15 Do you remember that in or around 1983 you and
16 your wife bought a home at [REDACTED] in Royal Palm
17 Beach?

18 A. I didn't bought it. I build it.

19 Q. You built it. You didn't buy it?

20 A. No.

21 Q. And do you remember that in April of 1995, you
22 and your wife purchased a single-family home in -- on
23 [REDACTED] in Wellington? Do you remember
24 that?

25 A. It was a lot.

1 Q. It was a lot. Okay.

2 A. Yes, we purchase that.

3 Q. Okay.

4 MR. CRITTON: What was the first date you gave
5 about built home?

6 MR. BERGER: July 1983.

7 MR. CRITTON: Thank you.

8 BY MR. BERGER:

9 Q. And does the purchase price of \$22,600; is
10 that correct --

11 A. Sounds familiar.

12 Q. -- for the -- for the [REDACTED]
13 lot; is that correct?

14 A. Uh-huh.

15 Q. Yes or no?

16 A. What date was that?

17 Q. April of 1995.

18 A. That's correct.

19 Q. Now, do you recall that in December of 1997
20 you and your wife bought apartment number 1902 at [REDACTED]

21 [REDACTED]

22 A. That's correct.

23 Q. -- in West Palm Beach; is that right?

24 A. Yes, sir.

25 Q. And does the purchase price of \$105,000; is

1 that accurate?

2 A. That's correct.

3 Q. Now, do you recall that in November of 1998
4 you and your wife bought apartment 1901 at [REDACTED]

5 [REDACTED]

6 A. Yes.

7 Q. And the purchase price was \$159,000?

8 A. That's correct.

9 Q. So in -- so did you -- as of November of 1998,
10 did you own both apartment 1902 and apartment 1901 at

11 [REDACTED]

12 A. Yes. But I didn't own the house in Royal Palm
13 Beach. I didn't -- I sold that. With that money we
14 bought that apartments.

15 Q. You built the house at the Royal Palm Beach
16 address?

17 A. Yes.

18 Q. After buying the lot?

19 A. Yes. We bought the lot years, years back.

20 Q. Now, in October of 2001, do you remember
21 buying a multi-family residential property at [REDACTED]

22 [REDACTED] in Wellington?

23 A. I still have it.

24 Q. And do you remember the purchase price being
25 \$310,000?

1 A. Yes, sir.

2 Q. And this is while you worked for Mr. Epstein,
3 correct? 2001, October 2001?

4 A. Yeah.

5 Q. And you still own it; is that what you said?

6 A. Yes.

7 Q. And is that a rental apartment building?

8 A. Yeah, it's a rental.

9 Q. And now, do you recall that in September of
10 2002 you and your wife purchased a multi-family
11 residential property at [REDACTED] West Palm
12 Beach?

13 A. That's correct.

14 Q. And the purchase price was \$590,000? Do you
15 remember that?

16 A. Yes.

17 Q. And then in October of 2004 you bought the --
18 you bought a multi-family residential property -- strike
19 that.

20 In October of 2004 your wife purchased a
21 multi-family residential property at [REDACTED]
22 Drive, Boynton Beach?

23 A. That is not correct. That is a house.

24 Q. That's where you live now?

25 A. That's where we live now.

1 Q. And that's just a single-family home?

2 A. That's a single-family home.

3 Q. Okay. And now, did Mr. Epstein contribute any
4 money to the purchase of any of these properties?

5 A. He contribute the -- he contribute the \$20,000
6 towards the purchase of the first property.

7 Q. Well, the first property was back in 1983?

8 A. No. No. The first property at [REDACTED]

9 [REDACTED]

10 Q. That's apartment 1902?

11 A. 1902.

12 Q. Did he contribute any other money towards any
13 of the other properties?

14 A. No.

15 Q. So you paid \$590,000 for the property at
16 [REDACTED] without the assistance of Jeffrey Epstein?

17 A. That's correct. I had a loan, took a big loan
18 on that.

19 Q. So he had absolutely nothing to do with your
20 purchase of that property?

21 A. Nothing.

22 Q. And he contributed nothing towards any -- to
23 the purchase of any of the other properties that I
24 mentioned?

25 A. Nothing.

1 Q. Okay.

2 MR. BERGER: Mark this as Exhibit 4, please.

3 (Exhibit number 4 was marked for
4 identification purposes.)

5 BY MR. BERGER:

6 Q. Look at Exhibit 4, sir. It's two pages. And
7 it's from Florida Department of State, Division of
8 Corporations?

9 A. Yeah.

10 Q. And would you turn to the next page, the
11 second page?

12 On the second page, do you see your signature
13 and your wife's?

14 A. Yes.

15 Q. And do you recognize this as an application
16 for registration of a fictitious name?

17 A. Yes.

18 Q. And is that -- did you and your wife apply for
19 registration of a fictitious name?

20 A. Right. This was done by our lawyer,
21 Fetterman.

22 Q. And was that done in January of 2003? Look in
23 the upper right.

24 A. Yes.

25 Q. Is that correct?

1 A. Uh-huh.

2 Q. Yes?

3 A. Yes.

4 Q. And the fictitious name was [REDACTED]

5 Properties, correct?

6 A. That's correct.

7 Q. And did Jeffrey Epstein have anything
8 whatsoever to do with the registration of this
9 fictitious name?

10 A. Absolutely nothing.

11 MR. BERGER: Mark this as the next Exhibit.

12 (Exhibit number 5 was marked for
13 identification purposes.)

14 MR. WILLITS: Spell the name of that last --

15 MR. BERGER: It's [REDACTED]

16 [REDACTED] Properties.

17 MR. WILLITS: Thank you.

18 BY MR. BERGER:

19 Q. The next Exhibit, sir, has papers from the
20 Department of State, Division of Corporations. Do you
21 see it makes reference to [REDACTED] Up at
22 the top.

23 It says: "Detail by officer/registered agent
24 name." And then under that it says, "Florida limited
25 liability company."

1 A. Where is that, sir? Just point it.

2 Q. Then it says, [REDACTED] is that
3 right?

4 A. Yes, sir.

5 Q. Then do you see the next couple pages includes
6 a letter from Adam Fetterman to the Department of State?
7 Do you see that?

8 A. Yes, sir.

9 Q. And then the next -- the next page is an
10 articles -- articles of organization for Florida limited
11 liability company. Do you see that?

12 A. Yes, sir.

13 Q. And then on the very last page, is that your
14 signature?

15 A. Yes, sir.

16 Q. Okay. Is that your application to organize
17 the Florida limited liability company, [REDACTED]

18 [REDACTED]

19 A. Yes. I just sign it. This was done by the
20 lawyer.

21 Q. Did Jeffrey Epstein have anything to do with
22 the creation of this company?

23 A. Absolutely nothing.

24 Q. Did Jeffrey Epstein pay for Mr. Fetterman's
25 services to do this?

1 A. Absolutely no.

2 Q. Now, this was -- this [REDACTED]
3 it appears to have been incorporated in August of 2003.
4 Do you recall that? Does that sound correct?

5 A. Yeah.

6 Q. And between December of 2002, when you left
7 Mr. Epstein's employment, and August of 2003, when you
8 incorporated [REDACTED] did you speak to
9 Jeffrey Epstein?

10 A. Never spoke again.

11 Q. Or with anybody on his behalf, such as his
12 staff or an investigator for him? Anybody?

13 A. Nothing.

14 Q. Okay. Did you go to his home between January
15 and August of 2003?

16 A. No. Except twice, the two incidents that it
17 happened.

18 Q. But those -- and those happened later, after
19 August of 2003, correct? Those happened either --

20 A. Yeah. I never went to the home for any reason
21 to talk to him or to anybody.

22 Q. Okay. So in September and October when you
23 went to Mr. Epstein's house --

24 A. Yeah.

25 Q. -- uninvited, --

1 A. Uh-huh.

2 Q. -- you just assumed that he would have money
3 in his briefcase?

4 A. I assume.

5 Q. You hadn't talked to him in nine months; is
6 that your testimony?

7 A. That's my testimony.

8 Q. And you said that you needed that money
9 because of a woman that you were mixed up with?

10 A. That's correct.

11 Q. What's her name?

12 A. [REDACTED]

13 Q. And where does she --

14 A. I'm sorry. [REDACTED] I
15 already forgot the name.

16 Q. [REDACTED]

17 A. [REDACTED]

18 Q. Where is she now? Where does she live?

19 A. I have no idea. She left -- she left the
20 state. She was a girl from Brazil. The biggest mistake
21 of my life.

22 Q. And then you said during the questioning of
23 one or two of the attorneys that you entered into a
24 separation agreement with Mr. Epstein that included a
25 confidentiality agreement and a release. Do you

1 remember saying that?

2 A. Yeah.

3 MR. CRITTON: Form.

4 BY MR. BERGER:

5 Q. And those were signed by you?

6 A. And Mr. Epstein.

7 Q. And was that signed after the October
8 incident?

9 A. No. This was signed in January 2003.

10 Q. When you left?

11 A. Right after I left.

12 Q. Okay.

13 A. Right after I left, it was done through the
14 office in New York. Mr. Epstein never spoke to me
15 again. It was done through the lawyers in New York.
16 They send me the paper via Fed Ex. They send us a
17 check. That was the end of it. That happened in
18 January, January 2003.

19 Q. Do you have a copy of those documents?

20 A. Not in here.

21 Q. Do you have them at home?

22 A. Yes, I do.

23 Q. And let me just make sure I know what the
24 documents are.

25 There's a separation agreement?

1 A. Just a separation agreement.

2 Q. And that includes a confidentiality provision?

3 A. It was a -- there's a provision inside.

4 Q. And it also includes in it a release or is the
5 release separate?

6 A. I don't know. Lawyer terms. I'm not familiar
7 with that.

8 Q. Did you have a lawyer represent you in
9 connection with that?

10 A. No. I never need it.

11 Q. And you said Mr. Epstein paid you \$30,000 to
12 you and \$20,000 to your wife?

13 A. That's correct.

14 Q. And how was that paid to you?

15 A. Cash -- I mean, check. It was a check but it
16 was taken -- taxes were taken out. So it was minus
17 taxes.

18 Q. Was it one check for each of you?

19 A. Yes.

20 MR. CRITTON: Can we take a five-minute break?

21 MR. BERGER: Sure.

22 MR. CRITTON: Do you want to finish one line
23 of questioning?

24 MR. BERGER: No, go ahead. Go ahead.

25 VIDEOGRAPHER: Off the record at 2:15.

1 (Brief recess.)

2 VIDEOGRAPHER: We're back on the record at
3 2:21.

4 BY MR. BERGER:

5 Q. How many times have you talked with
6 investigators of Mr. Epstein?

7 A. One time.

8 Q. And that's the one time that you've mentioned
9 already?

10 A. Yes.

11 Q. And have you met -- talked to Mr. Critton
12 before today?

13 A. Oh, wait a minute. Sorry. I have to go back
14 on that. Twice. One time when the criminal case
15 started when they, like, find the card and Jeffrey says,
16 I cannot talk to you, somebody will call you. I talked
17 the investigator that I told you.

18 And the second time was, I guess, you -- I
19 don't know who was it, but they send -- they send me
20 the -- I don't know if it was an investigator or they
21 just give me your notice that I was going to be
22 subpoena.

23 MR. CRITTON: I think that came from
24 Mr. Willits' office.

25 MR. WILLITS: Jack Hill's office.

1 MR. CRITTON: That wasn't an investigator. It
2 was a subpoena server?

3 THE WITNESS: Yeah.

4 BY MR. BERGER:

5 Q. Process server. Process server.

6 Now, this is Mr. Robert Critton. Have you
7 talked to him before today?

8 A. Yes, sir.

9 Q. How many times have you talked to Mr. Critton?

10 A. Once in my house. And we talk about ten
11 minutes yesterday? Monday? Monday?

12 Q. Yesterday?

13 A. Yesterday.

14 Q. Okay. And what did you discuss?

15 A. Discuss the same questions that you telling
16 me. And he told me basically, say the truth. Tell the
17 truth, nothing but the truth. And be firm and be --
18 speak your mind and don't be afraid.

19 I thought that this incident about my life
20 never would have come out. I wish it would have never
21 come out. But I guess it come out and it's too late.

22 Q. Well, you know what this case is about, don't
23 you?

24 A. Of course. I think it's a case against
25 Mr. Epstein. But it's not a case against me, is it?

1 Q. No.

2 A. Oh.

3 Q. And you know it's --

4 (Brief interruption.)

5 BY MR. BERGER:

6 Q. And you know it's a serious case for the
7 people that are bringing it?

8 THE COURT: Form.

9 THE WITNESS: Absolutely.

10 BY MR. BERGER:

11 Q. So you had this conversation with Mr. Critton
12 yesterday?

13 A. Not about the seriousness, no.

14 Q. No. No. But the conversation that you had
15 with Mr. Critton was yesterday, correct?

16 A. Yes. Told him he -- he told me basically he
17 was going to be here, that a bunch of lawyers were going
18 to ask me questions and that I should be truthful and
19 nothing else, basically.

20 Q. Well, what else did he say?

21 A. What else did Mr. Critton says? Nothing. He
22 asked me about my health, because I was in the hospital
23 this week. He asked me how I felt.

24 And I says, well, I want to get this done. I
25 want to get it over, done, and go on with my life for

1 the rest of my life. I want to finish with this. I
2 don't want nothing to do with Jeffrey Epstein or this
3 case, once and for all.

4 Q. Did you talk to him about the confidentiality
5 agreement that you mentioned?

6 A. No.

7 Q. Or the separation agreement?

8 A. No.

9 Q. Or the arrest?

10 A. No.

11 Q. Or the \$30,000 that you were paid?

12 A. No.

13 Q. Did he tell you that this case that we're here
14 about --

15 A. \$30,000 where? What \$30,000?

16 Q. You said you were paid \$30,000 and your wife
17 was paid \$20,000.

18 A. Yes. Yes. The separation agreement. No.

19 No.

20 Q. You didn't talk about that?

21 A. No.

22 Q. Did he tell you there were young women suing
23 Mr. Epstein? Did he tell you that yesterday?

24 A. No. He mentioned to me that it was a lot of
25 lawsuits against Mr. Epstein, criminal and civil suits.

1 And -- not yesterday, but when he was in my house with
2 his secretary.

3 Q. Not yesterday?

4 A. Not yesterday.

5 Q. When was he was at your house with the
6 secretary?

7 A. About two months ago, a month and a half ago.

8 Q. You can't look to him to answer. You've got
9 to answer.

10 A. I cannot remember exactly the date, but I
11 would say it was about a month ago.

12 Q. Maybe I misunderstood. Was Mr. Critton at
13 your house yesterday?

14 A. No. He called me yesterday.

15 Q. He called you yesterday?

16 A. Yes, sir.

17 Q. And you talked for about ten minutes yesterday
18 on the phone?

19 A. No more.

20 Q. Did you tell me everything that you and
21 Mr. Critton talked about yesterday?

22 A. Yes.

23 Q. Now, he visited your house --

24 A. Yes.

25 Q. -- a month and a half or two months ago --

1 A. Absolutely.

2 Q. -- with his secretary?

3 A. Yes.

4 Q. And did she take notes?

5 A. Yes, she did.

6 Q. Pardon me?

7 A. She did.

8 Q. She took notes. Just by pen and paper?

9 A. Pen and paper.

10 Q. Not a machine like the court reporter?

11 A. No.

12 Q. Were you taped? Did somebody tape record you?

13 A. No.

14 Q. Did he show you the notes that she took down?

15 A. No.

16 Q. Typed up and show you the transcript?

17 A. No.

18 Q. No? Now, how long was Mr. Critton at your

19 house then?

20 A. For about half an hour.

21 Q. And did you know that he was coming? Did he

22 call ahead of time?

23 A. Yeah.

24 Q. And, so, what did you expect was going to

25 happen?

1 A. He was going to come in and ask questions
2 about this case.

3 Q. So what did he say?

4 A. Same questions that you guys are asking me,
5 exactly the same questions.

6 Q. Nothing more?

7 A. Basically what you saw, what you did, what
8 your job description was, what you did, how you start
9 your day, how was your day and how was -- what time you
10 started, what time you finish and what you did, and what
11 was your responsibilities. And that was it.

12 Q. Okay. And were you paid anything for that?

13 A. Absolutely not. The only money that I got, it
14 was from you for this \$47 check for coming in here.

15 Q. Okay.

16 A. And I will take no money from nobody.

17 Q. Okay. Were there -- were there any other
18 times that you talked to either Mr. Critton or anybody
19 from his office?

20 A. No.

21 Q. You described every time that you've ever
22 talked to either Mr. Critton or people from his office?

23 A. No, sir.

24 Q. You've described all those times that you've
25 talked to Mr. Critton or people from his office? I'm

1 not asking the question clearly.

2 Did you talk to Mr. Critton any other time?

3 A. No. I talked to Mr. Critton twice, once in my
4 house, once yesterday.

5 Q. Now, how about Mr. Jack Goldberger,
6 Mr. Epstein's criminal defense attorney, did you ever
7 talk to him?

8 A. No.

9 Q. Did you ever talk to Alan Dershowitz about any
10 of these matters?

11 A. No, sir.

12 Q. Or Roy Black?

13 A. No, sir.

14 Q. Now, I'm just going back over some different
15 things that you mentioned.

16 You said that there was a Roladex that you
17 created of names of women?

18 A. Not it was a name just woman. It was
19 companies, air condition companies. It was cleaning
20 companies. It was suppliers. And it was -- it was a
21 Roladex that I left it there.

22 Q. Did you have a list of girls on your Roladex?

23 MR. CRITTON: Form.

24 THE WITNESS: No. We had a list of girls in
25 a -- in a -- in a sheet with plastic that we have

1 all the massage therapists. It was two pages or
2 three pages of people in a plastic sheet that we
3 had it where -- by the telephones. That was it.

4 BY MR. BERGER:

5 Q. Have the names?

6 A. Names and phones.

7 Q. Telephone numbers?

8 A. Uh-huh.

9 Q. What about addresses?

10 A. No, no addresses.

11 Q. What about dates?

12 A. No, sir.

13 Q. And who prepared the list?

14 A. Either Ms. Maxwell -- Ms. Maxwell.

15 Q. Was it typed?

16 A. Yeah. They were types.

17 Q. No. Typed.

18 A. Yeah.

19 Q. Who typed it?

20 A. I don't know who type it, but it came from New
21 York.

22 Q. The list?

23 A. Yeah.

24 Q. Did you -- did you give the information that
25 went into the list?

1 A. No.

2 Q. Where was the list kept?

3 A. In many places. It was in Mrs. Maxwell's
4 desk. It was one in the kitchen, one in my office, one
5 in my room because sometimes I was in my room and I have
6 to call these people. It was one in the new house when
7 they build the new house. It was all over. And it was
8 also those -- those files for the house -- the house
9 running operation.

10 Q. Was it the same list that was in all those
11 places?

12 A. Basically, yes.

13 Q. Was the list updated?

14 A. Yes.

15 Q. Did you keep a copy of the list?

16 A. No, I don't have a copy of the list.

17 Q. When you left Mr. Epstein's employment, you
18 didn't take a copy with you?

19 A. Not at all.

20 Q. And when you worked for Mr. Epstein, you
21 didn't write notes about what you did and what you saw?

22 A. No.

23 Q. No?

24 A. No. I had too much to do.

25 Q. You didn't put anything in a computer about

1 what you saw at the house?

2 A. No, sir.

3 Q. Did you ever talk to your wife about what you
4 saw at the house?

5 A. Like what? Saw about what?

6 Q. About the dildos. About the massages. Did
7 you ever talk to your wife about that?

8 A. Yeah. And that's one of the reasons that I
9 never send my wife after -- this hap -- these dildos and
10 things like that happened right at the end of my stay
11 there. It never happened before. Right at the last
12 couple months before I left. And that --

13 Q. And that's when young girls --

14 MR. CRITTON: Let him finish his answer.

15 THE WITNESS: And my -- my worry about was
16 that my wife will panic. And I never send her up
17 there to clean up the rooms or anything else.

18 BY MR. BERGER:

19 Q. Is that when young girls started coming to the
20 house?

21 MR. CRITTON: Form.

22 THE WITNESS: One girl that I can think of.

23 BY MR. BERGER:

24 Q. Just one?

25 A. One girl. That girl that she show me the

1 picture.

2 Q. V.R.?

3 A. That's the only one that I can think she was
4 young, but I don't know how old.

5 Q. Do you still have the transcript from -- from
6 the police in front of you, from the State Attorney's
7 Office?

8 It's below that. It's at the bottom. Keep
9 going.

10 You see? Turn to page 9.

11 Page 9. Now, look at me. It says, page 10,
12 but it also says page 9.

13 So you got page 9?

14 A. Page 9 and page 10.

15 Q. Okay.

16 A. Oh, okay. Page 9. Okay.

17 Q. I want you to see page 9.

18 MR. CRITTON: You want the transcript page 9?

19 MR. BERGER: Yeah.

20 BY MR. BERGER:

21 Q. Let me just make sure you're on the right
22 page. Yeah.

23 Look at line 13.

24 It says, answer: "No, sir. Mostly no. We
25 saw one or two young ones in the last year."

1 Do you see that?

2 MR. CRITTON: Form. It's taken out of
3 context. There's no question.

4 BY MR. BERGER:

5 Q. Do you see those words?

6 A. Did they seem -- did they seem young to you?
7 No, sir, mostly were no. We saw two young ones in the
8 last year.

9 Q. Well, it actually says, "we saw one or two
10 young ones in the last year."

11 A. "We saw one or two young ones in the last
12 year. Before that they were all adults."

13 Q. The one or two young ones in the last year
14 that you're referring to, who are they?

15 A. One was V. and the another one was N.B.

16 Q. Don't write on that. Okay? Don't write on
17 that with your pen.

18 Look at paragraph -- look at line 19.

19 A. Yes.

20 Q. It says, quote, I remember one girl was young,
21 unquote.

22 Do you see that?

23 A. Yeah.

24 MR. CRITTON: Form.

25 BY MR. BERGER:

1 Q. Who were you referring to?

2 A. [REDACTED]

3 Q. And then you see under that at line 22, it
4 says, quote, but I imagine she was 16, 17. In my
5 judgment she was 16, 17, unquote.

6 Do you see that?

7 MR. CRITTON: Form.

8 THE WITNESS: Yeah.

9 BY MR. BERGER:

10 Q. Were you referring to [REDACTED]

11 MR. CRITTON: Form.

12 THE WITNESS: I think so, yeah.

13 Oh, can I read this again?

14 BY MR. BERGER:

15 Q. Sure, go ahead. Take your time.

16 A. "During the last year while you were working
17 for him, what do you mean, they look young? Did they
18 look like they were still in high school? Yes. And the
19 only one that I knew was in high school was N. I
20 remember one girl was young. We never ask her how old
21 she was. I never asked N. how old she was. I think she
22 was in the last year of high school.

23 Right. Understand.

24 Question.

25 But I imagine she was 16, 17. I don't know.

1 In my judgment she was 16, 17."

2 I was talking about, I was referring about N.
3 at that time.

4 Q. So at line 22, look at line 22.

5 A. Yes, sir.

6 Q. It says, quote, but I imagine she was 16, 17,
7 unquote.

8 You were referring to who?

9 A. To N.

10 Q. Okay. You can put that down.

11 You mentioned Joe Joe. You said Joe Joe was
12 the house man in New York?

13 A. Yes. I met Joe Joe.

14 Q. And do you know his full name?

15 A. Joe Joe work with his wife. They were
16 Funtanella (phonetics), Funtanella. Joe Joe and Lynn
17 was his wife, Funtanella.

18 Q. When is the last time you talked to them?

19 A. Wow. Never talked to them again in over ten
20 years.

21 Q. Now, you mentioned in response to Ms. Ezell's
22 questions, you said something about [REDACTED] father. Do you
23 remember talking about that?

24 A. Uh-huh.

25 Q. How do you know that person was her father?

1 A. Because either she told me or Ms. Maxwell told
2 me that her father used to work at Donald Trump's place.
3 And she -- I think he is the one who bring her to the
4 house that afternoon, the first time I saw [REDACTED] drive in
5 at this -- Donald Trump's house.

6 Q. Now, you said you know -- you knew who Alan
7 Dershowitz or you know who Alan Dershowitz is, right?

8 A. Many times.

9 Q. And he was at the house?

10 A. He's been at the house a lot of times.

11 Q. Was he ever at the house when there were naked
12 women at the house?

13 A. No.

14 Q. No?

15 A. They were never naked woman at the house, sir.

16 I remember one occasion when one English
17 girl -- I think she was English or German girl -- came
18 to the house. And usually in Europe they use topless,
19 they don't wear anything. But she was taking the sun
20 outside and she came to the house with nothing on and I
21 chase them out. I says, not in this house. You don't
22 do it. You go outside, put the towel and come in here.
23 Because she came to get something from the kitchen
24 wearing nothing. And I did not allow that.

25 Q. But when Alan Dershowitz was there, were there

1 any women that were topless?

2 A. No, not that I can remember.

3 Q. What about when Prince Andrew was there?

4 A. Not that I can remember, sir.

5 Q. Did you ever see Alan Dershowitz walking
6 around naked?

7 A. No, sir.

8 Q. How about Prince Andrew?

9 A. No, sir.

10 Q. You mentioned your divorce, that it cost -- it
11 cost money. Did Jeffrey Epstein pay for anything
12 connected with the divorce?

13 A. Absolutely nothing.

14 Q. Let me go back for a minute to the
15 confidentiality provision in the separation agreement.

16 Did you -- did you discuss with anybody why
17 there had to be a confidentiality provision? Did you
18 talk to somebody about that?

19 A. No. No. I discuss it with Mr. Epstein when
20 he told me, he finally come out and says, [REDACTED] - I know
21 they were going to try to replace us. And -- and we got
22 upset because I was not ready to leave yet. But at the
23 same time we were expecting to be left out. And I left
24 there before they decide to let me go.

25 And I went to -- I remember very clearly, I

1 went to his office in the pool house and it was -- I
2 talk to him and says, [REDACTED] - I went with some faxes
3 that came to my office and they were people interviewing
4 for my job. So I feel very pissed about it.

5 And I went to his office and said, Jeffrey,
6 what is this? And what is this? And what is this?

7 He says, well, that's Ghislaine. I'm not
8 involved into that.

9 And I says, okay. We're going to leave,
10 Jeffrey. That's it. We're done. And what you going to
11 do for me?

12 And he says, well, what you want?

13 And I says, give me at least a year's salary.

14 And that's what it turn out to be, around
15 \$50,000, plus the van.

16 And he says, okay [REDACTED] wish you good luck.
17 And the last day I was there we shake hands and we left.

18 But my relationship with him, it was good. It
19 was friendly. At the beginning of the -- my job was
20 very friendly. Then he changed when Ms. Maxwell come
21 in. I didn't like to work for her. She was a bitch.
22 And she make us life hell. And that's why we left. But
23 it was not with Mr. Epstein.

24 Q. Do you know why there was a confidentiality
25 provision in your agreement?

1 A. No. That's lawyer stuff. I don't know.

2 MR. BERGER: Okay. That's all I have.

3 CROSS EXAMINATION

4 BY MR. CRITTON:

5 Q. Mr. Alessi, my name is Bob Critton, as you
6 know, and I represent Mr. Epstein.

7 A. Yes, sir.

8 Q. You've been -- this deposition started at
9 10:00. It's almost -- it's closing in on 3:00 but for
10 about 45 minutes or an hour that we took for lunch. I'm
11 going to try to be relatively brief so we can get you
12 out of here. Okay?

13 A. Okay, sir.

14 Q. You've been asked questions by five different
15 lawyers who represent various Plaintiffs in this case.

16 A. Yes, sir.

17 Q. In some instances you've been asked the same
18 question multiple times?

19 A. Yes, sir.

20 Q. The testimony -- you've also been asked a
21 number of questions about your separation from
22 Mr. Epstein sometime at the end of December of '02 and
23 the entrance or your entering into a separation
24 agreement with him?

25 A. Uh-huh.

1 Q. Correct?

2 A. Yes.

3 Q. And subsequently there was an incident in 2003
4 that you've described in some detail, based on the
5 questions that have been asked, and you and Mr. Epstein
6 reached an amicable agreement; you repaid him the monies
7 that you had taken and you parted?

8 A. Yes.

9 Q. Is that a fair statement?

10 A. And I will have to add something to that.

11 When we talk at the luncheonette, we have coffee, he
12 says, [REDACTED] if you were not my best employee that I ever
13 have and that you would not take care of my mother, I
14 would have put you away. And that's the way he come out
15 to me.

16 And I says, I like you and let's -- just pay
17 me back in one or two weeks, because I send the money
18 back and it got lost. So he give me another -- not him,
19 but his lawyer says, you got another month to pay. So
20 between I got the money -- the money order was lost in
21 the mail. So I send it back. I pay everything, \$6,310.
22 I think it was 6310. And that was it.

23 Q. And I'm more interested, not so much in the
24 details [REDACTED] but the color, so to speak, the
25 lawyers have put on this, is, is that as a result of

1 your separation from Mr. Epstein in late-2002 and the
2 incident in 2003, that somehow you have colored your
3 testimony to help Mr. Epstein today.

4 And my question to you is: Have you told us
5 the truth today as to every question that's been asked
6 and the questions that are going to be asked of you?

7 A. To every one of you.

8 MR. WILLITS: Object to the form of the
9 question.

10 BY MR. CRITTON:

11 Q. And with regard to the agreements that you
12 entered into with Mr. Epstein, in particular the
13 confidentiality agreement, you were asked a question by
14 Ms. Ezell whether you understood that you're not bound
15 by confidentiality today. And you responded in the
16 affirmative, right? You understand that you're to tell
17 us -- to answer every question fully to the best of your
18 knowledge?

19 A. Absolutely.

20 Q. And that you have done today?

21 A. Yes.

22 Q. Okay.

23 MR. WILLITS: Object to the form of the
24 question.

25 BY MR. CRITTON:

1 Q. You told us off the record -- and I don't know
2 whether it was on the record, so I want to be clear
3 because you've been sitting here a long time. You're
4 currently under care and treatment for having
5 chemotherapy; is that correct, sir?

6 A. Yes, I have.

7 Q. And I think you told us earlier that you were
8 in the hospital two days last week?

9 A. Last week, yeah.

10 Q. And, so, we've -- you've done great. You've
11 probably done better than the lawyers today. But you'd
12 like to get this over today and finished?

13 A. I hope so.

14 Q. All right. There have been a lot of questions
15 about your job description and duties at Mr. Epstein's.
16 And if I understood it correctly, is basically, once you
17 became the full-time house manager, you were responsible
18 for all aspects of the operation of the El Brillo
19 residence?

20 A. I was.

21 MR. WILLITS: Object to the form of the
22 question.

23 BY MR. CRITTON:

24 Q. And during the time that you were responsible
25 for all aspects of the El Brillo residence, that

1 included not only maintenance and repair, but
2 appropriate staffing, laundry, cleaning, shopping,
3 cooking, whatever -- whatever needed to be done at the
4 home?

5 A. That's correct.

6 MR. WILLITS: Object to the form of the
7 question.

8 BY MR. CRITTON:

9 Q. And during the time that you were there as the
10 full-time -- as the house manager from 1992 up until
11 December of 2002, you did all those different types of
12 responsibilities; is that a fair statement?

13 A. Yes.

14 MR. WILLITS: Object to the form of the
15 question.

16 BY MR. CRITTON:

17 Q. And at some point -- let me strike that.

18 The original deal, so to speak, that you cut
19 was with Mr. Epstein; that is, when you became the
20 full-time house manager; is that true?

21 A. That's true.

22 Q. And some point within -- what? -- a year or
23 so, I think Eva -- Eva --

24 A. Eva.

25 Q. Anderson --

1 A. Left.

2 Q. -- was no longer Mr. Epstein's -- Dr. Eva
3 Anderson was no longer Mr. Epstein's girlfriend, --

4 A. That's correct.

5 Q. -- and a new girlfriend came in and that was
6 Ghislaine Maxwell?

7 A. That's correct.

8 Q. And when Ms. Maxwell came in, she, in essence,
9 took over as your immediate supervisor?

10 A. That's correct.

11 Q. During the time that you worked for
12 Mr. Epstein, did you have a good, excellent, fair, what
13 was -- how would you describe your relationship with
14 him?

15 A. Good, excellent or fair.

16 I will think good.

17 Q. And did you interact with him very much or
18 does he interact with anybody very much?

19 A. He doesn't interact very much. At the early
20 years, yes, he did come to the kitchen and we used to
21 sit down in the kitchen and he would discuss my kids, my
22 family, his family, and he will talk to me.

23 At the end of my stay there, it was -- I
24 was -- we were told not even to look at his face. Not
25 even to -- this was done by -- this was even done by,

1 they hire a Countess from Europe to write this book and
2 to write ideas of how the house of royalty should be.
3 And that's the way Ms. Maxwell wanted the house to run,
4 as a royal house. And I was pissed off at that and I
5 never agreed with that and I never went with the book.
6 I threw the book away. And that was it.

7 MR. CRITTON: Let me move as non-responsive to
8 my question. Move to strike.

9 MR. WILLITS: He should allowed to finish what
10 he thinks is responsive to your question, even if
11 you don't agree.

12 BY MR. CRITTON:

13 Q. Were you finished, sir?

14 A. Yes, I finish.

15 MR. CRITTON: See, he's finished.

16 MR. WILLITS: He wasn't, but okay.

17 BY MR. CRITTON:

18 Q. I'm trying to -- listen carefully to my
19 question because I'm trying to get you out of here
20 sooner rather than later.

21 If I understood your testimony is, is that,
22 you had -- you considered your relationship with
23 Mr. Epstein to be good during those years?

24 A. Good.

25 Q. And would you describe your relationship with

1 Ms. Maxwell as not being as good?

2 A. Yes.

3 Q. When -- you were -- you had an opportunity
4 over lunch, Mr. Berger gave you a copy of a statement
5 that you gave to the State Attorney's Office on
6 November 21, 2005, we've marked as Exhibit, I think,
7 Exhibit --

8 MR. CRITTON: What did we mark it as, 2?

9 THE WITNESS: At what page?

10 MR. WILLITS: Yes. It was 2.

11 MR. CRITTON: Thank you.

12 BY MR. CRITTON:

13 Q. No, just statement, the whole statement.
14 You had an opportunity to look at it over
15 lunch?

16 A. Yes.

17 Q. And that's a statement you gave back on
18 November 21st of 2005?

19 A. Uh-huh.

20 Q. Is that correct?

21 A. That's correct.

22 Q. And at that time you were there with
23 Mr. Murrell, who was your attorney. And you gave a
24 statement and I think as well your wife spoke with the
25 State Attorney's Office?

1 A. That's correct.

2 Q. And whatever questions the State Attorney
3 asked of you at that time, I assume you fully answered;
4 is that correct?

5 A. Absolutely.

6 Q. And then page 9 where Mr. Berger took you with
7 regard to the questions -- and before I get -- I'm going
8 to come back to page 9 in a minute.

9 But if I understood your earlier testimony in
10 response to one of the lawyers who asked you questions,
11 is, there were a number of European women, all who you
12 deemed to be 20-plus years old, that would travel with
13 Mr. Epstein to various places and as well would come to
14 the house from time to time?

15 A. That's correct.

16 Q. And I think you testified in response to
17 Mr. Berger's questions today, is that the only female
18 that you understood that came to the house during the
19 time that you were the house manager who you knew to be
20 under the age of 18 was N.B.?

21 A. That's correct.

22 Q. And you knew she was under 18 because you
23 would pick her up from high school?

24 A. That's correct.

25 Q. And that's a young girl who I think you

1 said --

2 A. 16, 17.

3 Q. And I think you said she never was involved in
4 giving any massages to Mr. Epstein?

5 A. I don't think so, never.

6 Q. And the times that you saw her, Mr. Epstein
7 was mentoring her on a career which ultimately turned
8 into her becoming an actress?

9 A. I think so. Yeah, that was the main purpose.

10 Q. And on multiple occasions when she would be
11 over, she would be over there at Mr. Epstein's home with
12 her mother; is that correct?

13 A. Yes, that's correct.

14 Q. And of the girls that came or the women that
15 came to give massages to Mr. Epstein over the years you
16 were there, I think you've described on page 9 of your
17 deposition that you may have seen a hundred or 200
18 different massage therapists?

19 A. It could be less. I don't think it's more
20 than 200, but it could be less than 200, yes. It was --
21 it was 11 years or 12 years or 13 years of constant
22 people going in and out and people that were coming to
23 the house, he will bring for another state, he will
24 bring in his planes. People that it came from Europe,
25 massage therapists, there were men and woman. They live

1 in Miami, we -- so it was so many that I cannot remember
2 how many.

3 Q. Okay. And I understand that. I'm just
4 referring back to your statement where it says at page
5 9, line 9, the question was: "Yeah. Yeah. Not the
6 same girl. I mean, during 11 years I probably saw a
7 hundred, 200 different massage therapists."

8 Do you see that?

9 A. Yes.

10 Q. All right. And if I understood your testimony
11 is, the ones the -- that is, of the massage therapists,
12 as you've just described, you saw some men?

13 A. Yes.

14 Q. You saw more women?

15 A. More woman.

16 Q. And all of the women, at least from your
17 viewpoint, were 18, 19 or older?

18 A. Yes.

19 MR. CRITTON: Why don't you change your tape
20 right now.

21 VIDEOGRAPHER: Off the record at 2:54.

22 (Brief recess.)

23 VIDEOGRAPHER: We're back on the record at
24 2:55.

25 BY MR. CRITTON:

1 Q. [REDACTED] in the 11 years that you worked
2 for Mr. Epstein, with regard to the massage
3 therapists -- and I'm talking about all of them, women,
4 men, the ones that were 18, 19, 20, or the ones that
5 were older -- did you ever see -- or, first of all, did
6 you ever hear any complaints about -- from the massage
7 therapists about the massage they had given to
8 Mr. Epstein?

9 A. No.

10 Q. Did you ever see a massage therapist during
11 those 11 years that appeared to you to be distraught?

12 A. Never.

13 Q. To be in some form of a shock?

14 A. Never.

15 Q. To be scared?

16 A. I never see anybody scared.

17 Q. Did you ever see someone who looked like they
18 were upset or crying?

19 A. No, sir.

20 Q. I think you, in response to Mr. -- well, not
21 sure who asked the question -- but they -- you were
22 asked whether you ever spoke to the individuals --

23 A. Yes.

24 Q. -- when they came down. And I think you said
25 from time to time you might have some small talk with

1 them afterward?

2 A. Yeah.

3 Q. Did you usually see them if they came down?

4 A. Yeah.

5 Q. So you would have had an opportunity to
6 observe their appearance, correct?

7 A. That's correct.

8 Q. Have you seen people who look distraught, in
9 shock, scared, upset, angry in the past -- not massage
10 therapists -- have you seen people in your life
11 experiences?

12 A. Oh, yeah, yes.

13 MR. MERMELSTEIN: Object to the form.

14 BY MR. CRITTON:

15 Q. So if -- well, let me ask it this way: In
16 your life experiences before you worked for Mr. Epstein,
17 and, in fact, during the time you worked for
18 Mr. Epstein, have you seen individuals not associated
19 with Mr. Epstein who appeared to be distraught, in
20 shock, scared, upset, angry or injured?

21 A. Yes.

22 MR. MERMELSTEIN: Object to form.

23 BY MR. CRITTON:

24 Q. Have you seen people who appeared to you to
25 have been traumatized by a particular event?

1 MR. MERMELSTEIN: Object to form.

2 THE WITNESS: Yes.

3 BY MR. CRITTON:

4 Q. Have you seen people who seem to be -- well, I
5 assume you've seen people who have yelled or screamed as
6 a result of some event that had occurred in your
7 presence?

8 A. Yes.

9 Q. On the massage therapists that you saw at
10 Mr. Epstein's house from 1992 up until the time you left
11 in December of '02, did you ever see any type of
12 reaction, distraught, shock, scared, upset, crying,
13 disheveled, injured, disoriented, yelling or screaming
14 for help at any time?

15 A. No, sir.

16 Q. Once the massage -- once -- let me strike
17 that.

18 If I understood your testimony, you helped set
19 up -- either you set up the room or you helped set up
20 the massage room?

21 A. Uh-huh.

22 Q. And you might be the person or it might be
23 someone else who would lead the massage therapists or
24 the female up to the room, the male or the female up to
25 the room?

1 A. Yes, sir.

2 Q. Once that person was upstairs, you then would
3 come back down and resume your multiple duties
4 downstairs?

5 A. Absolutely.

6 Q. As to what occurred during the course of a
7 massage, do you have any personal knowledge during the
8 11 years you were there?

9 A. There was absolutely no way to know or to get
10 into the room. The windows were what they have, those
11 automatic electric shutters. They were completely dark,
12 completely a hundred percent dark, the rooms. And it
13 was -- nobody saw it. I knew it when I was at the house
14 that I never saw anything was going on inside.

15 Q. So you have no personal knowledge what
16 occurred during any particular massage?

17 A. Nothing.

18 Q. And I think you said -- well, let me strike
19 that.

20 In other individuals whom you have done work
21 for at big houses in Palm Beach, did those people from
22 time to time have massages, too?

23 A. I never work in a house inside as I did work
24 for Mr. Epstein.

25 Q. Yours was outside maintenance work?

1 A. I was the maintenance guy outside.

2 Q. All right. And if -- well, let me strike
3 that.

4 You're aware that there's all sorts of spas.
5 The Breakers? PGA? Trump?

6 A. Absolutely.

7 Q. The Ritz Carlton? The Four Seasons? And
8 probably a thousand other places in Palm Beach County?

9 MR. WILLITS: Object to the form of the
10 question.

11 BY MR. CRITTON:

12 Q. Well, let me strike that.

13 Are you aware that there's more than ten
14 places that someone can get a massage in Palm Beach
15 County?

16 A. Of course.

17 Q. Are you aware that there's probably more than
18 a hundred places, maybe a thousand places in Palm Beach
19 County from Boca Raton up through Jupiter and all the
20 way out west where people can get a therapeutic or a
21 massage?

22 A. Yes.

23 Q. And I assume you were aware that -- or were
24 you aware of that during the time period that you worked
25 for Mr. Epstein?

1 A. Yes.

2 Q. And I think you told us that you were aware
3 that there were massage schools?

4 A. Yes.

5 Q. And is it your understanding that generally
6 massages are given in a -- in a room with a table where
7 the lights are generally turned down?

8 A. And music on, yeah.

9 Q. All right. You were asked a question about
10 vibrators or I think that the word was sex toys.

11 If you'll turn to page 20 of your statement,
12 sir.

13 If you look at page -- if you just glance at
14 line 9 --

15 A. Okay.

16 Q. -- through line 22. Take a chance. If you'll
17 just look at that, then I'll ask you a couple questions.

18 Read to yourself, please. Otherwise, the
19 court reporter will have to take down everything you
20 say.

21 A. Yeah.

22 Q. And at least the statement that you gave back
23 in -- on November 21st of 2005, almost -- almost four
24 years ago now, you describe that there were -- that you
25 saw two types of massagers or vibrators; is that

1 correct?

2 A. That's correct.

3 Q. And is that your best recollection, as you sit
4 here today?

5 A. That's the best recollection.

6 Q. And one of the vibrators, you said was, as you
7 described earlier, looked like a dildo?

8 A. Right.

9 Q. And --

10 MR. WILLITS: Object to the form of the
11 question.

12 BY MR. CRITTON:

13 Q. Well, let me ask you this: Was the item that
14 you described, that's described at lines 12, 13 and 14,
15 and 15 -- 12, 13 and 14 on page 20, is that what you
16 described, is that what you were talking about as the
17 dildo?

18 A. Yes.

19 Q. And I assume you're familiar with what a dildo
20 is?

21 A. I know that it's one of those --

22 Q. You don't have to describe it. Just are you
23 familiar with what one is?

24 A. No, I don't. I'm not really familiar with
25 that type of instruments. But what did I saw it and is

1 it true now, is it true when I make this statement, it
2 was a big rubber man's --

3 Q. Penis?

4 A. -- looking penis, with double head, two heads.

5 Q. And --

6 A. And I don't know how is it even called. And I
7 am sorry. It's a little unpleasant.

8 Q. That's all right.

9 The second item that you described was a neck
10 and back vibrator; is that correct?

11 A. Yeah. They have this vibrators, they have the
12 cordless and they have these balls and they have
13 different types of those vibrators, too.

14 Q. Like you can get them at Brookstone or
15 something like that?

16 A. Yeah. Yeah. Yes, sir.

17 Q. So at least when you were at Mr. Epstein's,
18 and I think as you described in response to lawyer's
19 questions today, is during the last couple of months
20 that you worked at Mr. Epstein's you saw these two
21 vibrators?

22 A. Yes.

23 Q. And on those two occasions you'd take those
24 vibrators, if you went up to clean afterwards, you'd put
25 on your gloves, pick them up with a towel and you'd

1 clean them off and you'd put them back in
2 Mrs. Maxwell's --

3 A. Closet.

4 Q. -- closet in her bathroom?

5 MR. WILLITS: Object to the form of the
6 question.

7 THE WITNESS: I put it back in the closet and
8 inside the closet there was a laundry basket that
9 is where she had those.

10 BY MR. CRITTON:

11 Q. And as to whether or not someone actually used
12 those items or how they were used, all you know is you
13 found them --

14 A. I find it in the sink.

15 MR. BERGER: Objection. Mr. Critton is
16 testifying. Leading.

17 MR. WILLITS: Objection, also, to the form.

18 BY MR. CRITTON:

19 Q. Let me ask you this: Do you know, if I
20 understand it correctly, you found the two vibrators,
21 one for the neck and back and the other one that you
22 described as a dildo, you found them in the sink on
23 those few occasions near the end of your employment?

24 A. Yes.

25 MR. BERGER: Objection. Testifying. Leading.

1 THE WITNESS: I find it in the sink.

2 BY MR. CRITTON:

3 Q. And then you would clean up and put it back in
4 Ms. --

5 A. I will put my rubber gloves, get a towel, put
6 them under the sink, run the water and put them in the
7 closet.

8 Q. And you put them back in Ms. Maxwell's closet?

9 A. Closet.

10 Q. Why? Why into her closet?

11 A. Because they were always kept there.

12 Q. All right. You testified earlier, is that if
13 you were going to call someone for a massage, it would
14 either be you or Ms. Maxwell, if I understood you
15 correctly?

16 A. Yeah.

17 Q. Okay.

18 A. At the end -- at the end of my stay was also
19 another girl, [REDACTED] that came. And then she was
20 handling everything, as far as calls to these girls.

21 Q. Did Mr. Epstein ever make these calls?

22 A. I never heard.

23 Q. If Mr. Epstein was not in residence, that is,
24 if he was in New York or some place else other than Palm
25 Beach, did you and your wife still stay at the home or

1 would you go to one of your apartment?

2 A. No. We went to our apartment.

3 Q. And then when he wasn't there, would you have
4 pretty more regular hours around the house?

5 A. Pretty much. Pretty much, yeah. That was the
6 days that we had to have the cleaning crew, I still had
7 to go to the house and oversee the cleaning operation,
8 oversee the gardener because there was not, when they
9 were there the gardener weren't supposed to make noise,
10 so we have to take care of the pool, the chlorine and
11 all that stuff.

12 Q. So you would still do your regular but you
13 could finish pretty much 9:00 to 5:00?

14 A. Yes. That was much easier.

15 Q. And when he was -- how often would he
16 generally be in Palm Beach?

17 A. Too much.

18 Q. All right. But if -- would he be here at
19 least a couple --

20 A. I would says, at least three times a year -- a
21 month, three weeks a month, three weekends a month.
22 Usually they come in on a Thursday. Either they left a
23 Monday or Tuesday.

24 Q. And then they go wherever else they were going
25 and then things would get back to more of a 9:00 to 5:00

1 type routine?

2 A. That's right.

3 Q. And if he was in residence, that's when your
4 job became much more all encompassing?

5 A. Exhausting.

6 Q. Okay. You were asked about a female named
7 [REDACTED] I think you originally thought it was [REDACTED] but
8 [REDACTED]

9 A. Yeah.

10 Q. You recall now; is that correct?

11 A. Yes. Yes.

12 Q. And I think you described her, I think your
13 recollection was, is that you remember her being at the
14 house the last few months that you worked for
15 Mr. Epstein?

16 A. Yeah. The last few months.

17 Q. And that's the only time that you remember her
18 actually being there?

19 A. Yeah.

20 Q. Because you actually recall when she used to
21 work at Mar-a-lago, and then you recall her starting to
22 come to --

23 A. To the house.

24 Q. -- Mr. Epstein's home?

25 A. Right.

1 Q. And I think you testified that at one time you
2 had to pick her up and she lived at her house or she was
3 living with her boyfriend at some house out in Royal
4 Palm Beach; is that correct?

5 A. That's right.

6 Q. Did you know anything about [REDACTED]

7 A. Not necessarily. Not that I can remember. I
8 knew the one time either Ms. Maxwell or Mr. Epstein told
9 me that she was arrested because she was working in --
10 in the restaurant and she took her -- the tips, her tips
11 for that day. And the next day she was arrested and the
12 money have to be returned and -- it was something about
13 that, but that's it. That's all I know.

14 Q. Okay. Was it -- let me ask you this: Do you
15 remember her stealing some money from the Roadhouse
16 Restaurant where she was working?

17 A. That's what I heard, that it was a report,
18 there was a police report.

19 Q. All right. And, so, at least you understood
20 from Mr. Epstein or Ms. Maxwell that she had stolen
21 money from her employment?

22 A. Yeah.

23 Q. Again, you never saw the police report?

24 A. No.

25 Q. Nor the date of it?

1 A. No.

2 Q. That's correct?

3 A. That's correct.

4 Q. And as to whether she repaid the money or what
5 happened with that criminal charge, do you know?

6 A. No, I don't.

7 Q. Do you know whether there's an arrest out for
8 her -- a warrant out for her arrest at the current time?

9 A. No, sir.

10 Q. Were you aware of any of her other background;
11 that is, before she ever met Mr. Epstein, were you aware
12 that she, back in, say, 1997, that she was involved in a
13 sexual battery between with her and three girls and
14 three boys that were engaged in sexual or lewd acts and
15 they were found by some individuals in, as was
16 described, compromising positions with the males on top
17 of the females, including her, and she was intoxicated?
18 Did she ever talk about that with you?

19 A. No.

20 MR. BERGER: Objection. Compound question.

21 And Counsel is testifying.

22 MR. WILLITS: Object to the form.

23 MS. EZELL: Join.

24 BY MR. CRITTON:

25 Q. Were you aware that she had, prior to the time

1 she ever met Mr. Epstein, that she had -- her mother
2 described her as having significant drug problems?

3 MR. BERGER: Objection. Counsel is
4 testifying.

5 THE WITNESS: No.

6 BY MR. CRITTON:

7 Q. Mrs. Ezell used -- she referred to a Tony --

8 MS. EZELL: Santiago.

9 THE WITNESS: Santiago.

10 BY MR. CRITTON:

11 Q. Have you ever heard of a Tony Figueroa?

12 MS. EZELL: Thank you. You're right.

13 THE WITNESS: I know that his name was Tony,
14 but I don't know if it was Santiago or Figueroa. I
15 don't remember the last name. I never spoke to
16 him, except ask him to move his car one time.

17 BY MR. CRITTON:

18 Q. And did Mr. -- got it wrong -- did

19 Mr. Figueroa bring  to the Epstein house on more
20 than one occasion?

21 A. Yes.

22 Q. And did you consider her, at least from your
23 viewpoint, was she one of the individuals who came to
24 give massages?

25 A. She was supposed to be a massage therapist.

1 Q. And, so, Mr. -- at least Mr. Figueroa --
2 Tony -- assuming, if I asked you to assume his name was
3 Figueroa, was he aware that his live-in girlfriend was
4 coming to Mr. Epstein's house to give him a massage?

5 A. I don't know if he was aware of it. He was
6 waiting outside.

7 Q. All right. And you understood that she, that
8 is, [REDACTED] and Mr. Figueroa or Tony, a Tony lived together
9 out in Royal Palm Beach?

10 A. Yes.

11 Q. And as to what their relationship was and as
12 to what -- that is, their internal relationship was and
13 whether there was abuse, either physical or verbal,
14 associated with that, do you have any personal
15 knowledge?

16 A. Not except that that time that I went to pick
17 her up and she was crying and she told me the furniture,
18 the couch was slit with like a razor blade or a knife,
19 and also the screen porch at the entrance, it was cut.

20 And I ask, I said, what happened here?

21 She says, well, my boyfriend got mad and he
22 did it.

23 Q. And she indicate -- she, [REDACTED] told you it was
24 her boyfriend that caused all that damage?

25 A. Yeah.

1 Q. With regard to [REDACTED] did it ever appear to you
2 that she was forced to come to Mr. Epstein's home?

3 A. I don't think so. I don't know if it was
4 forced between them, but I never saw force. I never
5 saw -- I was there the first time Ms. Maxwell met her
6 immediately that she went into the spa, when she was
7 walking into the spa. And I was surprised to see that
8 afternoon she was at the house.

9 Q. Did you ever see anyone forcing Ms. R. onto
10 the Epstein's premises; that is, either by grabbing her
11 by the arm or by the hand and dragging her in?

12 A. No. Either her or nobody else.

13 Q. Did you ever see Ms. -- [REDACTED] when she came to
14 the home where she appeared to be -- that is, when she
15 arrived at the home to be upset or angry or distraught?

16 A. No.

17 Q. And specifically with regard to [REDACTED] when she
18 left on those occasions where you saw her in person
19 leave the house, did she appear to be in the same, I'd
20 say, overall demeanor and mood when she left as she had
21 been when she came?

22 A. Yeah, normal. She was normal.

23 Q. Did she smile?

24 A. Yeah.

25 Q. Say hello to you?

1 A. They all smile after they got paid.

2 MR. CRITTON: All right. That's all I have.

3 Thank you, Mr. Alessi.

4 THE WITNESS: You're welcome.

5 MR. WILLITS: I don't have any questions.

6 MR. BERGER: Okay.

7 MS. EZELL: I do.

8 RE CROSS EXAMINATION

9 BY MS. EZELL:

10 Q. Sorry. Let me find my place, here.

11 First of all, forgive me. I didn't mean to
12 mislead anyone. It is Figueroa, not Santiago. I think
13 he lived on Santiago Street.

14 A. Yeah. Santiago Street in Royal Palm Beach.

15 Q. Right. And I confused the two.

16 A. My head is not going very well now, so...

17 Q. Do you need to take a break?

18 A. Please. No, I am fine. I am fine.

19 Q. Well, it was my head that wasn't going very
20 well then.

21 You mentioned that your wife, I believe you
22 said that -- let me start over.

23 I believe you said one reason you wanted to
24 stay was that it was causing psychological problems --

25 A. Yes, it is.

1 Q. -- and problems with your marriage?

2 A. Absolutely.

3 Q. What kind of psychological problems?

4 A. I say, psychological problems. I says,
5 marital problems. That would be a better answer it.
6 Because the stressful was on me. If there was a dust,
7 spot of dust, they never came to her. And she was able
8 to -- she was over involved with the cleaning crew, but
9 it was never from Mr. Epstein or Ms. Maxwell yell, they
10 will never go to [REDACTED] to ask, hey, [REDACTED] this
11 doesn't look good.

12 And, so, I had all the blame. And the only
13 person I have to take it out was my wife, unfortunately.
14 And that was the worst mistake, to have my wife working
15 in there.

16 Q. Did she ever complain to you or seem disturbed
17 by what she thought was going on there?

18 A. No. She never saw anything.

19 Q. Was there ever a guest there by the name of
20 Tommy Matola?

21 A. Tommy Matola? No. Not when I was there.

22 Q. You mentioned this morning that there were
23 some visitors who were very important men, Noble Prize
24 winners?

25 A. Yes, ma'am.

1 Q. Are you -- do you recall a Martin Nowak?

2 A. I think that sounds familiar. If he is an old
3 guy, old man?

4 Q. I think so. Mathematician?

5 A. Yes.

6 Q. Biologist?

7 A. Yes. His name Martin. I recall that, yes.

8 Q. And do you recall a guest, Murray Gell-Mann?

9 A. Mary Gell-Mann?

10 MR. WILLITS: I think you said --

11 MS. EZELL: Murray.

12 MR. WILLITS: -- Murray and he said Mary.

13 BY MS. EZELL:

14 Q. Murray, Murray Gell-Mann. And, again, I'm
15 speaking of these -- these --

16 A. Is that a man or a woman?

17 Q. I believe it's a man.

18 A. Murray Gell-Mann. Could be, but I don't
19 recall.

20 Q. Do you recall the name Jerry Edelman?

21 A. No.

22 Q. What about -- can't read my own writing
23 here -- Henry Risorski (phonetics)?

24 A. Henry Risorski, yes. Yes.

25 Q. Was he a frequent visitor or --

1 A. Not too frequent. But, also, he was a
2 science -- I think so, he was into the science.

3 Q. And Larry Summers?

4 A. Larry Summers. Yes. Larry Summers was a
5 lawyer?

6 Q. I think perhaps he was the president of a
7 college?

8 A. I don't know.

9 Q. No?

10 A. No.

11 Q. Well, then among those that you recall,
12 Mr. Nowak, the biologist and Mr. Risorski, did they ever
13 have massages that you can recall?

14 A. I cannot recall, no.

15 Q. Was it your impression that Mr. Epstein liked
16 to surround himself with extraordinarily bright people?

17 A. Yes.

18 MR. CRITTON: Form.

19 BY MS. EZELL:

20 Q. And is it your impression, also, that he's
21 rather bright and brilliant himself?

22 A. Yes.

23 MR. WILLITS: Form.

24 BY MS. EZELL:

25 Q. Did -- did you ever gain the impression that

1 he was some sort of brain scientist?

2 MR. CRITTON: Form.

3 THE WITNESS: No. No. No. I know his
4 background. And I -- over the years I learn how he
5 come up and into the business and how he make his
6 fortune. And I don't think he was a brain
7 scientist.

8 BY MS. EZELL:

9 Q. Nobody ever told you that?

10 A. No.

11 Q. If you take a look again at page 9 of the
12 transcript, Exhibit 2?

13 A. Okay.

14 Q. Let me call your attention to line 2, which
15 begins with the question: "Did he have girls come over
16 to give massages?"

17 A. Yes.

18 Q. And you said: "Yes."

19 A. Yes.

20 Q. The next question is: "How many massages
21 would he have in one day?"

22 And I think you said earlier, maybe --
23 sometimes they'd have three a week?

24 A. No. No. That was not the question.

25 Sometimes he had one, two or three a day.

1 Q. That's what I wanted to ask you. Up to three
2 a day sometimes?

3 A. Up to three a day.

4 Q. And did that happen often?

5 A. Very often. Or he had yoga in the morning or
6 in the afternoon it was a massage. I don't know that
7 again. When it was yoga, it was in the pool house.
8 When it was massage, it was upstairs. So I don't what
9 they did when closed doors, you know. But it was a
10 couple of these girls that were yoga experts and they
11 were massage therapists at the same time, so I don't
12 know. But there were -- many times there were two,
13 three massages a day.

14 Also, she had a massage just about every day.

15 Q. Meaning, Ghislaine?

16 A. Yes.

17 Q. Then on line 12, the question was: "Did the
18 massage therapists seem young to you?"

19 And you said: "Mostly, no. You saw one or
20 two young ones in the last year."

21 A. Yeah.

22 Q. Then, again, still --

23 MR. CRITTON: Object to form.

24 BY MS. EZELL:

25 Q. -- still talking about the massage therapist,

1 they asked you: "What do you mean, when they looked
2 young?" On line 17.

3 Do you see that?

4 MR. CRITTON: Form.

5 THE WITNESS: Yeah.

6 BY MS. EZELL:

7 Q. Then you go on to say: "I remember one girl
8 was young. We never asked how old she was. It was not
9 my job."

10 And the questioner said: "Right. I
11 understand."

12 And you said: "I imagine she was 16 or
13 17," --

14 A. That's correct.

15 Q. -- "in my judgment."

16 A. Yes.

17 MR. CRITTON: Form, I think.

18 BY MS. EZELL:

19 Q. There was -- the only people being discussed
20 in all of this conversation were the massage therapists,
21 right?

22 MR. CRITTON: Form.

23 THE WITNESS: Well, we discuss about N., this
24 girl that I mention in here. I thinking about her
25 because -- what's her name?

1 BY MS. EZELL:

2 Q. V.?

3 A. V. I think she was a massage therapist for
4 sure, because we set up the tables for her. But at
5 this --

6 MS. EZELL: Let me just -- excuse me. Just a
7 minute. Let's make it [REDACTED] That's all.

8 MR. CRITTON: Okay. I'm sorry.

9 THE WITNESS: [REDACTED] And I lost my
10 concentration.

11 MR. CRITTON: Why don't you read his response
12 to him?

13 She can read it back to you.

14 (Previous answer was read.)

15 THE WITNESS: Yeah. I was -- in this
16 statement I was thinking of her, [REDACTED] -- no, V.

17 BY MS. EZELL:

18 Q. R.?

19 A. Sorry again.

20 It was N.B. that I knew she was underage and I
21 knew it because I went to the high school and pick her
22 up.

23 Q. But she was not a massage therapist, --

24 A. No, she was not.

25 Q. -- as far as you know?

1 A. As far as I know, she was not.

2 Q. And you were talking throughout this page
3 about those girls that came to give massages?

4 MR. CRITTON: Form.

5 BY MS. EZELL:

6 Q. Correct?

7 MR. CRITTON: Form. Argumentative. Asked and
8 answered.

9 THE WITNESS: No. If I says she was a massage
10 therapist, I would says, no. But, then again, I
11 don't know if she was a massage therapist, too.

12 BY MS. EZELL:

13 Q. Okay. You do mention N. on page 21 of your
14 statement.

15 If you look at line 7, you mention a young
16 girl, but she was not a massage therapist?

17 A. Let me take a look. Page 21.

18 Q. At about line 7.

19 A. Line 7.

20 MR. CRITTON: But it in the context of your
21 answer --

22 MS. EZELL: Sure.

23 MR. WILLITS: And the question, too.

24 THE WITNESS: Question: "How" -- let me start
25 it from the beginning -- from the end.

1 Many of the -- it's been a while. It was J.
2 It was D. It was R. It was so many, V., L. It was
3 so many names, that I think if you name -- if
4 you -- any girl's name, she's been there probably,
5 S., J., J.

6 It was also a young girl but she was not a
7 massage therapist. She came to the house as a
8 friend.

9 I talking about B. because I knew she was not
10 a massage therapist because she went to high school
11 and she was a singer, an opera singer and she was
12 brought to the house by her mother. So I knew they
13 had nothing to do with massages. They were friends
14 and they were going to the movie with her, dinner
15 with her. And she had -- I think she travelled
16 with her, too. They travel.

17 Q. My only point is, that on page 9 you were
18 talking about the massage therapists. And you said that
19 you remember that there were a couple of young ones the
20 last year.

21 And, so, among the young massage therapists
22 that you might remember in the last year, would V. be
23 that person or --

24 MR. CRITTON: Form.

25 BY MS. EZELL:

1 Q. -- would be the young one?

2 A. Yeah.

3 Q. You stated that Ms. Maxwell was very hard on
4 you and you got blamed for everything, and that you --
5 you liked the job and you liked Mr. Epstein, but you
6 didn't like working for Mrs. Maxwell?

7 A. That's correct.

8 Q. Can you tell me why, other than that she
9 blamed you for everything?

10 A. She came from a very wealthy family and she
11 was -- just my opinion; I give my personal opinion --
12 that she was rotten spoiled and she tried to drive the
13 house like a palace and not a home.

14 I was -- I discussed it with her, many, many
15 times we have discussions. And sometimes I even refuse
16 to do her orders, knowing that I was going to be backed
17 up by Mr. Epstein or do the right thing, my thinking of
18 running the house should be. But we never had a good
19 relationship at all from the beginning, I don't think
20 so. But I was -- have to be her driver and she will go
21 and shop all over the malls and I will have to go behind
22 her, pay for it and bring the bags to the car.

23 Next day or the same day she will do shopping
24 and buy and say, [REDACTED] go to this store and get it. It
25 was a lot of work. It was a lot that she created and

1 most of this jobs that she created.

2 Q. And one of those things you also had to do
3 with her was to take her to different spas?

4 A. Yes.

5 Q. And there she would recruit young women to
6 come and do massages?

7 A. Because she was English. And she didn't know
8 the area too much as well as I knew. So she -- she
9 says, [REDACTED] make a list of all the massage -- the spas
10 in the area from Jupiter to Boca Raton. And we went to
11 all the main spas. And then we went to the schools for
12 massage therapists, and all the massage parlors, and
13 massage, the small massage.

14 So I make a list from the telephone book and
15 we would go from one to the another one. I would wait
16 in the car and she goes in.

17 And sometime she took a couple minutes and
18 walk out with cards, business cards. And that -- she
19 did the recruiting.

20 And from then, she pick up the girls and that
21 was the end of it. I never did any recruiting and I
22 never really saw him doing it.

23 Q. You really never saw?

24 A. Never saw Mr. Epstein recruiting anybody.

25 MS. EZELL: All right. I have no other

1 questions. Thank you, sir.

2 MR. MERMELSTEIN: I just have a couple follow
3 up.

4 RECROSS EXAMINATION

5 BY MR. MERMELSTEIN:

6 Q. [REDACTED] I'll be very brief.

7 You testified that a process server came and
8 gave you the subpoena to appear here today, correct?

9 A. Yes.

10 Q. For your deposition?

11 A. Yes.

12 Q. Did you call anyone after you received the
13 subpoena to talk to them about this?

14 A. No.

15 Q. You didn't call anyone?

16 A. No.

17 Q. Did you -- how did you come in contact with
18 Mr. Critton's office to set up the meeting that you
19 discussed?

20 A. His -- his secretary left me a messages on
21 my -- in my machine.

22 Q. And then you called back?

23 A. Then I called back.

24 Q. And you set up the meeting that you mentioned?

25 A. And we set up a meeting for the Labor Day,

1 Labor Day, Monday.

2 Q. What about -- but you said a month and a half
3 ago -- oh, this was before you were subpoenaed, is when
4 you had the meeting at your house with Mr. --

5 A. Yes, before I was subpoenaed.

6 Q. How did that meeting come about? How did that
7 get set up? Who called who?

8 A. Okay. Before -- I am stuck on this question.
9 I don't know. I think it was Mr. Critton office. I
10 think it was Mr. Critton office. They call me. And
11 they left me a message that I must discuss -- call Mr.
12 -- yeah. I had a message in my phone that to call
13 Mr. Critton because he would like to speak to me about
14 Jeffrey Epstein. That was the message.

15 And I call it. Then I spoke to him. We set
16 up an appointment. I was sick at that time. And he
17 came to my house and we discussed it.

18 Q. Other than Mr. Critton, --

19 A. Yes.

20 Q. -- in the last few months have you spoken to
21 anyone about the civil cases or your testimony?

22 A. No, not even my kids.

23 Q. Did you discuss this with your wife?

24 A. My wife, yes. My kids, no.

25 Q. What did you and your wife talk about?

1 A. Same thing, what's going on. How bad the
2 situation was.

3 Q. What do you mean, "how bad the situation was?"

4 A. How -- I guess how he got into this mess.

5 Q. How Mr. Epstein got into this mess?

6 A. (Nods head.)

7 Q. Can you be more specific as to what you and
8 your wife said?

9 A. No. It was just the publicity, you know, that
10 his name was on the -- on the magazines and the paper
11 and tv. And I thought that that would never happen.

12 Q. And you and your wife felt bad for Mr. Epstein
13 because of that?

14 A. You know, after you know somebody and he
15 becomes a friend of yours for ten years, I think you
16 feel bad, no matter how bad he has made. And I don't
17 know what he has done or what -- what the final results
18 of this will be. I still will feel bad about it, just
19 because the person that he was and how generous he was
20 with me and other people.

21 Q. Just to be clear, other than Mr. Critton and
22 your wife, you haven't spoken to anyone else about the
23 civil cases or your deposition testimony?

24 A. No, sir.

25 MR. MERMELSTEIN: All right. That's all I

1 have.

2 MR. CRITTON: I have one last question.

3 RE-CROSS EXAMINATION

4 BY MR. CRITTON:

5 Q. I want to just clear up one thing, [REDACTED]
6 Go to page 9.

7 A. Page 9, looks like the one that is important.

8 Q. That's right. We've belabored this one to
9 death.

10 MR. WILLITS: I think the ink has worn off the
11 page by now.

12 BY MR. CRITTON:

13 Q. It's Exhibit 2. This is the statement that
14 you gave to the State Attorney's Office on November 21st
15 of '05.

16 Mr. Berger asked you questions about the young
17 girl. Ms. Ezell just asked you some questions about
18 that.

19 So what I want to do is clarify, so that I
20 know what -- so there's no confusion, at least in the
21 record.

22 On page 9, line 16, it says: "During the last
23 year when you were working with him, what do you mean
24 they looked young? Did they look like they were still
25 in high school?"

1 And your answer was: "I remember one girl was
2 young. We never asked how old she was. It was not my
3 job."

4 Did I read that question and answer correctly?

5 A. That's correct.

6 Q. If I understood your testimony in response to
7 Mr. Berger, the girl that you were referring to, because
8 there's a reference to high school, was [REDACTED]

9 A. Yeah, that's correct.

10 Q. Not [REDACTED]

11 A. No. [REDACTED] didn't look to me like a 16 year
12 old.

13 MR. WILLITS: All right. Thank you. That's
14 all I have.

15 MR. WILLITS: You have the right to read and
16 sign this deposition if it's typed up. I'm not
17 going to be ordering it, but if somebody types it
18 up you have the right to read and sign it or you
19 can waive that right. It's up to you entirely. If
20 you want to waive the right to read it, tell the
21 court reporter you want to waive the right.

22 THE WITNESS: Can you repeat that again?

23 MR. CRITTON: Why don't we go off the record.

24 (Discussion held off the record.)

25 THE WITNESS: I waive that right. I don't

1 think I need to see.

2 (Witness excused.)

3 (Deposition was concluded.)

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