

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO:502008CA028051XXXXMB AB

█.

Plaintiff,

-vs-

JEFFREY EPSTEIN
AND █ █,

Defendants.

_____ /

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010
10:09 - 2:30 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting
Job No.: 1317

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3507-011

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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EFTA00158250

1 APPEARANCES:

2 On behalf of the Plaintiff, [REDACTED], [REDACTED] and Jane Doe:

3 BRADLEY J. EDWARDS, ESQUIRE
4 FARMER, JAFFE, WEISSING, EDWARDS
5 FISTOS & LEHRMAN, P.L.

6 [REDACTED]
7 [REDACTED]

7

8 On behalf of the Plaintiff Jane Does No.'s 1
9 through 8.

9

10 STUART MERMELSTEIN, ESQUIRE
11 MERMELSTEIN & HOROWITZ, P.A.

12 [REDACTED]
13 [REDACTED]

13

14

15 On behalf of the Defendant, Jeffrey Epstein and the
16 Witness:

16

17 JACK ALAN GOLDBERGER, ESQUIRE
18 ATTERBURY, GOLDBERGER & WEISS, P.A.

19 [REDACTED]
20 [REDACTED]

20

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I N D E X V O L U M E I

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WITNESS: DIRECT CROSS REDIRECT
JANUSZ BANASIAK
BY MR. EDWARDS 4

- - -

E X H I B I T S

- - -

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P R O C E E D I N G S

- - -

Deposition taken before Cynthia Hopkins,
Registered Professional Reporter and Florida
Professional Reporter, and Notary Public in and for
the State of Florida at Large, in the above cause.

- - -

Thereupon,

(JANUSZ BANASIAK)

Having been first duly sworn or affirmed, was
examined and testified as follows:

THE WITNESS: Yes, ma'am.

DIRECT EXAMINATION

BY MR. EDWARDS:

Q. Would you tell us your full name.

A. Janusz Banasiak.

Q. Could you spell that for us.

A. J-a-n-u-s-z, Banasiak, B like boy,
B-a-n-a-s-i-a-k.

█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]

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█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]

8 Q. And where are you currently employed?

9 A. With Jeffrey Epstein.

10 Q. How long have you been employed with
11 Jeffrey Epstein?

12 A. Since February 2005.

13 Q. What do you do for him?

14 A. My position is called a house manager. So,
15 basically my duties is to make sure that house is in
16 good order when he is around visiting.

17 Q. And have your duties always been the same
18 since February, 2005 through --

19 A. Yes.

20 Q. -- the present?

21 A. Yes.

22 Q. Okay. Have you ever had your deposition
23 taken before?

24 A. No. This is my first time.

25 Q. All right. The rules are pretty simple.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 We only have one court Reporter, so it's important
2 that we don't talk over one another. I will wait
3 until you finish your answer. You wait for me to
4 finish my question.

5 A. Okay.

6 Q. Give us an answer similar to what you are
7 doing that we all understand. It's easy when we get
8 into a casual conversation and nod your head or
9 shake your head, but the court reporter can't take
10 it down so just something verbal.

11 A. Okay.

12 Q. If I ask a question you don't understand,
13 tell me you don't understand.

14 A. Okay.

15 Q. So, who hired you to work with Jeffrey
16 Epstein in February of 2005?

17 A. Who hired me?

18 Q. Right.

19 A. I got the phone call from my agency because I
20 signed with agency that Jeffrey Epstein looking for the
21 position in Palm Beach.

22 Q. And what agency was that?

23 A. This was Regal Domestic, Regal Domestic. I am
24 not sure but something with the Domestic. The office
25 was in Maryland. I signed to the Internet.

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█ [REDACTED]

17 Q. And when you started in 2005 when you

18 heard that there was a job position with Jeffrey

19 Epstein, did you interview for that position?

20 A. Yes.

21 Q. Who did you interview with?

22 A. First I got interviewed with Ghislaine

23 Maxwell.

24 Q. And that's G-h-i-s-l-a-i-n-e, Maxwell?

25 A. Right, right.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 Q. Where did that interview take place?

2 A. In New York.

3 Q. And it was for the position as house
4 manager in the Palm Beach house, correct?

5 A. Right.

6 Q. That's at 358 Albrillo way?

7 A. Correct.

8 Q. Why were you interviewed in New York, if
9 you know?

10 A. Because at that time I was living in New York
11 with my friends and so --

12 Q. Where did the interview take place in New
13 York?

14 A. In her house on 65th Street.

15 Q. Whose house, do you know?

16 A. Ghislaine Maxwell.

17 Q. So, Ghislaine Maxwell interviewed you back
18 in 2005 at her house in New York for a position at
19 Jeffrey Epstein's house in Palm Beach?

20 A. Right.

21 Q. And what did the interview consist of?
22 What did she ask you?

23 A. She asked me basic questions, you know, what's
24 my previous employer, how long I work for them and
25 basically she was checking my resume.

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1 Q. Okay. And did she ask you about a
2 starting salary?

3 A. No, not yet. We just was a preliminary
4 interview, checking.

5 Q. How long was the interview?

6 A. How long?

7 Q. Yes.

8 A. How long did it last?

9 Q. Yeah. How long did the interview last?

10 A. Maybe 20 minutes, half an hour.

11 Q. All right. After that interview, what's
12 your next contact with either Ghislaine Maxwell,
13 Jeffrey Epstein or anybody else associated with that
14 job?

15 A. My second interview with Jeffrey Epstein after
16 a few days.

17 Q. And where did that take place?

18 A. In his office on Madison Avenue.

19 Q. What's the address there?

20 A. I don't remember physical address. It was 27,
21 51st Street. Madison and 51st Street, corner. I don't
22 remember physical address.

23 Q. Okay. And what did you speak with
24 Mr. Epstein about during that interview?

25 A. Same thing. He ask me how long I work for [REDACTED]

1 [REDACTED], what was my duty, basically the same
2 thing.

3 Q. Did you talk about salary with him?

4 A. No.

5 Q. All right. So, what happened in that
6 interview to further your position with Jeffrey
7 Epstein?

8 A. After I finish interview with him I, I waiting
9 for a few days. And I got the phone call from secretary
10 that I had been accepted and offered the job.

11 Q. Okay. Who made that phone call to you?

12 A. One of the secretary. I don't remember her
13 name right now. She told me that they agreed to hire
14 me.

15 Q. Is this a secretary that is located in the
16 New York office?

17 A. Yes, yes. It was a call from the New York
18 office.

19 Q. And she told you that you were being
20 offered the job?

21 A. Right.

22 Q. And at that point in time were you offered
23 a salary?

24 A. Yes.

25 Q. Okay. So up to that point, you had made

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1 it clear to them that you wanted a job but not
2 necessarily how much you wanted to be paid?

3 A. Yes.

4 Q. All right. And what was your starting
5 salary?

6 A. It was \$58,000, I think, yeah.

7 Q. Did Jeffrey Epstein or anybody else during
8 this interview process tell you why the house
9 manager position had become available, meaning
10 somebody quit or why it was vacant?

11 A. No, no, he didn't. Nobody mention it.

12 Q. Okay. Do you know who the house manager
13 was prior to you being the house manager?

14 A. When I get to Palm Beach, one of the people
15 who work over there they told me that this guy working
16 currently for him Alfredo Rodriguez.

17 Q. Alfredo Rodriguez?

18 A. Yes.

19 Q. And who told you that Alfredo Rodriguez
20 was the previous house manager, do you remember who?

21 A. I think it was [REDACTED] [REDACTED]. She is
22 currently employed with him.

23 Q. [REDACTED] [REDACTED] is still employed by him,
24 right?

25 A. Yes.

1 Q. And she's a housekeeper or something?

2 A. Right.

3 Q. All right. So, when this secretary of New
4 York calls and offers you the job at \$58,000, you
5 accept the job?

6 A. Yes.

7 Q. And do you remember about what month that
8 was that January 2005 or so?

9 A. No. I think I start February 2005, but I, I
10 got a phone call I think it was end of December, 2004.

11 Q. Okay. So, the previous interview with
12 Ghislaine Maxwell and Jeffrey Epstein happened
13 sometime in late 2004?

14 A. Right.

15 Q. Okay. And when you say you got the job in
16 February 2005, is that when you came down to Palm
17 Beach to start working?

18 A. Yes.

19 Q. So, you had a month or so to gather your
20 stuff and get down?

21 A. Correct.

22 Q. And did you move down with anybody?

23 A. No, just myself.

■ [REDACTED]
■ [REDACTED]

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

█ [REDACTED]

8 Q. So, you came down in February 2005 and
 9 began working. What did you, what did you first
 10 start doing for Jeffrey Epstein?

11 A. First I doing? I don't remember nothing
 12 special.

13 Q. Okay. Well, were you working -- I will
 14 rephrase it. Were you working only for Jeffrey
 15 Epstein or were you working also for Ghislaine
 16 Maxwell, the other person who interviewed you, or
 17 anybody else in the house?

18 A. I guess only for him because she was visiting
 19 a few times house, but I am employed by him.

20 Q. Okay. What was your understanding at that
 21 time as to the relationship between Ghislaine
 22 Maxwell and Jeffrey Epstein?

23 A. They were like partners in business.

24 Q. Okay. What business was that, if you
 25 know?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 A. I don't know what kind of business but she was
2 the one who organized I would say employment with this
3 organization. So, whatever I need, if I have some kind
4 of problem, I contact her. She was the one who decided
5 what I have to answer my problems with, what I was
6 supposed to do.

7 Q. How many times did you have problems where
8 you had to go through her?

9 A. Well, not big problems. Just a question of
10 what certain, how to do certain things. For example,
11 what kind of flowers I have to buy, what kind of things
12 he likes, what time I supposed to serve him coffee in
13 the mornings, sort of organizing things.

14 Q. Those are things that you wouldn't ask
15 Jeffrey Epstein directly?

16 A. No, no. He doesn't like those things to ask
17 him directly. He would like to prefer either through
18 his assistant or like I say, Ghislaine Maxwell.

19 Q. Is that still the same today?

20 A. Yes, still the same. Unless, something happen
21 that I need to, nobody is around and I need to urgently
22 contact him, I go to him directly.

23 Q. So, for the most part if you have a
24 question or at least -- let's go back to 2005, you
25 had a question about what needed to be done in the

1 house, day-to-day stuff, you would ask Ghislaine
2 Maxwell?

3 A. Right.

4 Q. And would she normally, back in 2005, be
5 at the house in Palm Beach for you to ask her or
6 would you have to call her in New York?

7 A. To the phone up in New York. She was visiting
8 the house but most of the time I spoke with her on the
9 phone.

10 Q. Okay. Let's talk specifically about that
11 year in 2005. How often would Ghislaine Maxwell be
12 at the Palm Beach house when Jeffrey Epstein was at
13 the Palm Beach house?

14 A. I would say about once a month since I started
15 work.

16 Q. All right. Well, it was a bad question
17 because I understand that Mr. Epstein has several
18 homes, right?

19 A. Right.

20 Q. And he is sometimes in New Mexico or New
21 York or Florida or the Island or somewhere, right?

22 A. Right.

23 Q. So, I guess the first question is in 2005,
24 how often was Jeffrey Epstein at the Palm Beach
25 house on a weekly basis?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 A. Probably like two, three times a month.

2 Q. And when he would come to the Palm Beach
3 house two or three times a month, how long would he
4 stay typically?

5 A. Three days, sometimes two, sometimes four,
6 depends, you know, but it was no regular -- but no more
7 than four days I would say.

8 Q. Okay. And of those two or three trips to
9 Palm Beach, are you telling me that Ghislaine
10 Maxwell would usually come for one of them per
11 month?

12 A. Not usually, sometimes. Not every time but
13 sometimes they, she comes.

14 Q. Okay. But at that point in time in 2005
15 you understood that Ghislaine Maxwell and Jeffrey
16 Epstein were business partners?

17 A. Right.

18 Q. Did you know at the time what Jeffrey
19 Epstein did for a living?

20 A. Yes. He was one, I overheard invest money
21 with other people.

22 Q. Okay. Who told you that or who did you
23 overhear?

24 A. I think I read in the paper or something.
25 Nobody --

1 Q. So, you don't actually think you overheard
2 it. You think you read it?

3 A. Right. It's hard to say right now. I don't
4 remember but probably most, yeah, I think I read in the
5 paper.

6 Q. Did you understand in 2005 that Ghislaine
7 Maxwell and Jeffrey Epstein had an intimate
8 relationship with one another?

9 A. No.

10 Q. You only believed them to have a business
11 relationship?

12 A. Right.

13 Q. Okay. And when Ghislaine Maxwell would
14 come to Florida, what did you or what did you
15 observe her and Mr. Epstein do back in 2005?

16 MR. GOLDBERGER: Form.

17 THE WITNESS: What would they do? I mean
18 what?

19 BY MR. EDWARDS:

20 Q. What was a typical day for Jeffrey Epstein
21 and Ghislaine Maxwell when she was in town at the
22 same time he was in town.

23 A. I would say that they have breakfast in the
24 morning. They spend time reading, talking on the phone,
25 meeting people, go to the movies sometimes. They did

1 entertain a lot. They did go out for dinners I would
2 say.

3 BY MR. EDWARDS:

4 Q. Did you know at that time what Ghislaine
5 Maxwell did for a living?

6 A. No.

7 Q. Do you know today even what she did?

8 A. No.

9 Q. No. Back in 2005 to your knowledge, did
10 Jeffrey Epstein have a girlfriend or female
11 companion that was more than just a business partner
12 to your knowledge?

13 A. No, I didn't know.

14 Q. And for the most part I am going to try to
15 go chronological from 2005 to the present, but for
16 this question for that entire period of time that
17 you have known Jeffrey Epstein, 2005 through today,
18 have you ever known Jeffrey Epstein to have somebody
19 who you would observe to be a female companion or
20 girlfriend?

21 A. Yes. [REDACTED] [REDACTED].

22 Q. Okay. [REDACTED] [REDACTED]. When is the
23 first time that you believe you recognized [REDACTED]
24 [REDACTED] as a girlfriend to Jeffrey Epstein?

25 A. At one point, I don't remember exactly what

1 year was it, he told us that [REDACTED] will take some part
2 of the organization, organizing, scheduling. And she
3 would decide, you know, which way household supposed to
4 work, and if you have any questions or problems, we
5 could contact her. So, since then I figure out that
6 she's the person who, who is close to him.

7 Q. When did he tell you that?

8 A. I don't remember. Maybe a year ago, two years
9 ago.

10 Q. Okay. Well, if we could put it in --
11 obviously at this point in time Jeffrey Epstein is
12 on house arrest, right?

13 A. (Witness nods head).

14 Q. I'm sorry. It has to be verbal so she
15 could take it down.

16 A. Yes.

17 Q. And prior to that, he was serving a jail
18 sentence, right?

19 A. Right.

20 Q. Okay. I am only bringing this up to put
21 it in context as to when this -- when you realized
22 or were told information that led you to believe
23 [REDACTED] [REDACTED] was Jeffrey Epstein's girlfriend.
24 Was it while he was on house arrest, while he was in
25 jail, before that, after that?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 A. I think before, before house arrest, yes. I
2 mean house arrest, jail sentence.

3 Q. Before the jail sentence?

4 A. Right.

5 Q. So, I can tell you the jail sentence at
6 least the plea was June 30th, 2008. So, you believe
7 it was sometime prior to that date when you learned
8 that [REDACTED] [REDACTED] was the girlfriend of Jeffrey
9 Epstein?

10 A. Correct.

11 Q. Okay. And when I asked you what gave you
12 that belief, you started to tell me that the
13 conversation was actually Jeffrey Epstein telling
14 you that [REDACTED] [REDACTED] would be more in charge of
15 what happened around the house, the scheduling, and
16 things like that, right?

17 A. Correct.

18 Q. But that's similar to how Ghislaine
19 Maxwell's role was described before, right? And
20 that's not somebody that you considered a
21 girlfriend. So how do you distinguish [REDACTED] and
22 Ghislaine's role?

23 MR. GOLDBERGER: Form.

24 THE WITNESS: I noticed that they, they
25 spent some times together, more time together

1 and they travel together very often.

2 BY MR. EDWARDS:

3 Q. [REDACTED] you're talking about?

4 A. Right. And [REDACTED], and she was visiting very
5 often so I assume, you know, that there is some kind of
6 relationship between them.

7 Q. Okay. And when you say they are spending
8 time together, do you mean they are spending time
9 upstairs in the bedroom together, things like that
10 that would give you an idea?

11 A. No. I mean traveling together. They always
12 shop together when he was here. And when they go to
13 other places, she was with him too.

14 Q. Okay. Was [REDACTED] [REDACTED] already
15 somebody that had a relationship with Jeffrey
16 Epstein in February of 2005 when you first started
17 working?

18 A. No. I don't think so. I don't remember her
19 when I do the job. I don't remember her.

20 Q. So, you think -- I am sorry?

21 A. I don't remember the, 2005 when I started job,
22 I don't remember her being around at least a few months.

23 Q. Okay.

24 A. So, I recognize her and I met her probably
25 after a few months working for him.

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1 Q. So, you think that the first time that you
2 saw [REDACTED], if you started working in
3 February of 2005, may have been April or May 2005?

4 A. Could be.

5 Q. I am not going to hold to you to an exact
6 date, but just so I can put it in a timeline.

7 A. Could be. I don't remember exactly the one,
8 but at least a few months.

9 Q. And when you were introduced to her, do
10 you remember where it was?

11 A. Probably -- I don't know. Here I guess she
12 was.

13 Q. At the house?

14 A. At the house I guess. I don't remember. I
15 can't recall.

16 Q. And do you know how Jeffrey Epstein met
17 [REDACTED]?

18 A. No, I don't.

19 Q. The time when you met [REDACTED] did
20 it appear to you that Jeffrey Epstein was meeting
21 her at the same time or he already knew her?

22 A. I assume he knew her. She was here in the
23 house in Palm Beach. I assumed he knew her.

24 Q. Okay. It didn't seem like a brand new
25 guest?

1 A. No.

2 Q. Okay. But at that point in time -- well,
3 let me ask you; I don't want to put words in your
4 mouth. The time in April or May or around that area
5 in 2005 when you think is the first time that you
6 saw [REDACTED] [REDACTED] at the Palm Beach house, what
7 was your understanding of her role in Jeffrey
8 Epstein's life at that time?

9 A. I suppose one of his friends.

10 Q. Just a friend?

11 A. Right.

12 Q. Have you since 2005 through the present
13 seen any interaction between [REDACTED] and Mr. Epstein
14 that would give you further reason to believe they
15 are boyfriend and girlfriend or a couple?

16 A. Yeah. I saw him walking with her, you know,
17 holding her hand. I mean her hands, so I assume that
18 there is more than friendship between them.

19 Q. Okay. And when you came in 2005, did you
20 live at the house in Palm Beach?

21 A. Yes. There is a small house attached to the
22 main house. They call it staff house where I live.

23 Q. Okay. And is that the place where you
24 have resided since you began working in February
25 2005 through the present?

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EFTA_00006688

EFTA00158273

1 A. Yes.

2 Q. And that's a staff house that's on the
3 property, same property?

4 A. Right.

5 Q. Okay. All right. In your time living at
6 the staff house -- well, we'll get there.

7 Do you understand -- you understand why
8 you're here today and having your deposition taken,
9 correct? I mean, you know what this case is about?

10 A. Yes.

11 Q. And it revolves around young females going
12 over to Jeffrey Epstein's house on a regular or
13 frequent basis, correct?

14 A. Correct.

15 Q. And that's something that you observed?

16 A. Yes.

17 MR. GOLDBERGER: Form.

18 BY MR. EDWARDS:

19 Q. And when is the first time, you know, if
20 you got here in February 2005 when is the first time
21 that you noticed young females arriving to Jeffrey
22 Epstein's --

23 MR. GOLDBERGER: Object to form.

24 MR. EDWARDS: -- house.

25 MR. GOLDBERGER: You can go ahead and

1 answer.

2 MR. EDWARDS: There are times during the
3 deposition that your attorney is going to
4 object to the form of the question. And that's
5 a legal objection and so that he is making his
6 record and maybe this attorney will do the
7 same.

8 MR. GOLDBERGER: I will tell you if you
9 can't answer the question. Otherwise answer
10 the question.

11 THE WITNESS: Can you repeat the question?

12 BY MR. EDWARDS:

13 Q. Sure. No problem. If you got here in
14 February of 2005 to begin work --

15 A. Right.

16 Q. -- when is the first time that you
17 remember observing young females coming to the
18 house? Was it the first day, is it the second day,
19 is it a month, is it --

20 MR. GOLDBERGER: Form.

21 THE WITNESS: It's -- I don't remember,
22 you know, exactly what was the first, second or
23 third day during my, you know, working hours.
24 Like, I cannot tell you exactly which day was
25 it, but, yes, I notice that those young women

1 were coming for massage. And most of the time
2 I opened the door for them and let them in.

3 BY MR. EDWARDS:

4 Q. All right. Well, the civil aspect of
5 these cases has been going on for almost a year and
6 a half, almost two years. And prior to that you're
7 aware that there was a criminal investigation into
8 the same activity, right?

9 A. Yes.

10 Q. And through this discovery process,
11 information and belief leads us to an understanding
12 that these young females were coming to the house in
13 Palm Beach every day that Jeffrey Epstein was
14 staying at the house; is that fair to say?

15 MR. GOLDBERGER: Form.

16 THE WITNESS: I wouldn't say every day.
17 They come very often but not every day. Maybe
18 like if he was staying four days, probably like
19 two, maybe three days.

20 BY MR. EDWARDS:

21 Q. Okay. So, sometimes you remember there
22 being days where these young females I am describing
23 did not come to the house or at least you didn't see
24 them?

25 A. Right.

1 MR. GOLDBERGER: Form.

2 BY MR. EDWARDS:

3 Q. And for the most part you were told --
4 strike that. Your testimony is that you were told
5 these were young females that were coming over for
6 the purposes of giving massages?

7 A. Yes.

8 MR. GOLDBERGER: Form.

9 BY MR. EDWARDS:

10 Q. Who told you that?

11 A. Who told me that? [REDACTED], Jeffrey Epstein's
12 assistant.

13 Q. Okay. Were you told prior to you coming
14 down here in February 2005 that there would be these
15 young females coming over to the house very
16 frequently to give massages?

17 A. No.

18 MR. GOLDBERGER: Form.

19 THE WITNESS: No.

20 BY MR. EDWARDS:

21 Q. Okay. So, when you first started working,
22 you were not forewarned that these females would be
23 coming to the house?

24 A. No.

25 Q. All right. When was it -- did [REDACTED] tell

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 you -- tell me exactly what it was that [REDACTED] told
2 you so that I can use your own words to formulate
3 questions. What was it that [REDACTED] told you about
4 these girls coming over for massages?

5 MR. GOLDBERGER: Form.

6 THE WITNESS: Either she told me or she
7 called me and let me know that, for example,
8 certain time this woman, she mentioned name,
9 will come over, so I should let her in. That
10 was the procedure I followed.

11 BY MR. EDWARDS:

12 Q. Okay. So, just so that I understand what
13 you are saying, are you saying that the conversation
14 or the words that were spoken to you would be, did
15 she call you Janusz?

16 A. Janusz, right.

17 Q. Janusz, [REDACTED] is coming over today at
18 9:00. Let her in. She's coming for a massage?

19 A. Correct.

20 MR. GOLDBERGER: Form.

21 BY MR. EDWARDS:

22 Q. Okay. Please, if that's -- if she said
23 something different to you such as, hey, there is a
24 massage therapist coming over, then tell me. I am
25 just trying to get it accurate.

1 A. Yeah. You were accurate in the first.

2 Q. So, then she may say, at 4:00 [REDACTED] is
3 coming over to the house to give a massage; let her
4 in?

5 A. Correct.

6 Q. Okay. How soon after your first day on
7 the job did you get this call from [REDACTED] telling you
8 that some female's name would be coming over for the
9 purpose of providing a massage?

10 A. Maybe on the third or fourth day of my work.
11 I don't remember exactly how much.

12 Q. That was some day when Jeffrey had flown
13 into town and he was there?

14 A. Yes.

15 Q. Do you think that you were told by [REDACTED]
16 [REDACTED] that one of these young females would be
17 arriving to the house to provide a massage prior to
18 the first time you observed one of these young
19 females coming to the house to provide a massage?
20 Do you understand the question?

21 A. No, not really.

22 Q. Okay. What I'm asking is were you at the
23 house one day and a girl knocks on the door, hey,
24 I'm here to give you a massage and you go I don't
25 even know why, I don't know who you are; or did

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EFTA_00006694

EFTA00158279

1 █████ call you and say, hi, █████. is coming over to
2 provide a massage at X-time and then █████. showed up?
3 Do you see what I am saying? Which came first, the
4 girl or the comment?

5 A. No. First was either a phone call or
6 conversation with █████.

7 Q. So, there was never any surprise by
8 anybody?

9 A. No, no.

10 Q. And did you ask any questions whatsoever
11 when █████ said, hey, let her in, this person is
12 coming over for a massage?

13 A. No, no question.

14 Q. Do you remember the names of any of these
15 young females that came over to provide massages?

16 MR. GOLDBERGER: Form.

17 THE WITNESS: You just mentioned a few of
18 them.

19 BY MR. EDWARDS:

20 Q. I just picked them out of a hat.

21 A. █████., █████, and other, I don't know. I
22 don't remember.

23 Q. █████. sound familiar?

24 MR. GOLDBERGER: Form.

25 THE WITNESS: No. It's hard to remember

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 right now but I don't recall right now her
2 name.

3 BY MR. EDWARDS:

4 Q. I don't expect you to remember all of the
5 names. To me that's not important for today's
6 purposes. Is it fair to say that oftentimes there
7 would be a massage in the morning by one of these
8 females and a massage in the afternoon the same day?

9 A. Yes.

10 MR. GOLDBERGER: Form.

11 BY MR. EDWARDS:

12 Q. In fact, you know, you're not the first
13 witness who has testified as to what goes on in the
14 house. So is it, is my understanding correct that
15 there was a specific appointment set and a time set
16 for these girls to come over and that [REDACTED] [REDACTED]
17 would keep that appointment book?

18 MR. GOLDBERGER: Form.

19 THE WITNESS: I don't know if she kept
20 appointment, but most, I mean, almost -- yeah,
21 all the time I, I knew who is coming so --

22 BY MR. EDWARDS:

23 Q. And you said you knew the time?

24 A. Yes. Maybe it was like 50 minutes delay or
25 they show up late, but I knew because I have to let them

1 in. So, it has to be, you know, some kind of
2 announcement that they are here.

3 Q. Was it always [REDACTED] telling you the name
4 of the person and the time that that person would be
5 coming over for a massage?

6 A. Yes, most of the time.

7 Q. Okay.

8 A. I think there was another name, [REDACTED].

9 Q. [REDACTED]?

10 A. She also contact me when she has been hired.

11 Q. When you say contacted you, that implies
12 that you're not in the same house when she's telling
13 you what time this person is coming over?

14 A. Yeah. I mean, if I have nothing to do in the
15 main house, I have an office in the staff house where I
16 sit over there and I do some paperwork. So, either they
17 call me on the phone or come in and tell me
18 face-to-face.

19 Q. So, when [REDACTED] and would call, when
20 you're telling me that [REDACTED] or [REDACTED] would call
21 you and tell you who was coming over and what time
22 that person was set to come over, you're, you're
23 saying that that call would be made from the main
24 house to the staff house or it would either be made
25 in person depending on whatever it was?

1 A. Correct.

2 Q. But everybody is at the property at Palm
3 Beach. That's what we're talking about?

4 A. Yes.

5 Q. And the first time that you noticed one of
6 these young females coming over to provide what
7 [REDACTED] [REDACTED] told you was a massage, do you remember
8 who it was the first person you saw?

9 A. No, I don't remember.

10 Q. All right. Did you get to know any of
11 these --

12 A. No.

13 Q. -- females? Did you have much personal
14 interaction with them?

15 A. No. Just good morning, hello and --

16 Q. Fair to say that no matter who it was,
17 whether it was [REDACTED]. or [REDACTED] or any of the other
18 ones, their routine from the time that they come to
19 the door and knock on the door until the time that
20 they leave was relatively the same?

21 MR. GOLDBERGER: Form.

22 THE WITNESS: Yes.

23 BY MR. EDWARDS:

24 Q. Okay. And so if generically you can just
25 remember the typical scenario of let's say [REDACTED]., for

1 instance, somebody that you remember coming to the
2 door, can you tell me in your own words what you
3 observed from the time she arrived at the house
4 until the time that she left.

5 MR. GOLDBERGER: Form.

6 MR. EDWARDS: And just so the record is
7 clear, let's -- you've already been told by
8 [REDACTED], [REDACTED], [REDACTED]. is coming this time and then
9 she arrives at the door. So tell me what
10 happens from there.

11 MR. GOLDBERGER: Form.

12 THE WITNESS: Yeah. I hear the doorbell.
13 I went out. She introduce herself. I let her
14 into the kitchen. I offer her something to
15 drink and she sit in the kitchen and I left to
16 do some other stuff. And let her, let [REDACTED]
17 know that she's there.

18 BY MR. EDWARDS:

19 Q. Okay.

20 A. And sometimes I don't even, you know, notice
21 when they are leaving because, you know, the girls open
22 the door and just left.

23 Q. So, you were usually the person to greet
24 them but not always the person to walk them out?

25 A. Right.

1 Q. All right. So, your role was to greet
2 them at the door, offer them something to eat or
3 drink, and then turn them over to [REDACTED] for lack of
4 a better --

5 A. Right.

6 Q. And then, you know, at some point in time,
7 you had a chance to observe what [REDACTED] did with one
8 or more of these girls in terms of where she took
9 them for the message and things like that, right?

10 A. Right.

11 Q. So, tell me what would [REDACTED] then do?
12 Let's use [REDACTED]. for instance. She comes in. You
13 offer her something to eat or drink. And then you
14 say, all right [REDACTED], [REDACTED]. is here. What happens
15 after that?

16 A. She took her to, to the bedroom upstairs and
17 that's it.

18 Q. Okay. And did you know at the time that
19 Jeffrey Epstein was in the bedroom upstairs?

20 A. I didn't know. I assumed but I never know so
21 it's --

22 Q. You just knew that he wasn't somewhere
23 downstairs with you?

24 A. Exactly.

25 Q. All right. And the massage was

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 supposedly, the massage table was upstairs?

2 A. Right.

3 Q. Did you know the massage table was
4 upstairs?

5 A. I didn't see that at the time of them, but
6 going a couple of times I folded massage table and put
7 in there in the closet.

8 Q. You have been up to Mr. Epstein's bedroom?

9 A. Yes.

10 Q. I've been in the house recently but I
11 don't know if the house looks today like it looked
12 back in 2005. In fact, I'm led to believe that it's
13 changed somewhat?

14 A. Yes.

15 Q. Before we continue on with the typical
16 massage experience with the young females and
17 Mr. Epstein, I want you to tell me since 2005, since
18 you began working there, how, what changes have been
19 made to the interior of the house?

20 MR. GOLDBERGER: Form.

21 THE WITNESS: There is a new addition to
22 the kitchen. It's like a breakfast table. The
23 living room is different. It's bigger. They
24 knocked down a few walls over there.

25

1 BY MR. EDWARDS:

2 Q. Where did they knock down walls?

3 A. In the living room.

4 Q. In the living room?

5 A. Yes. And the bedroom has been changed.

6 Q. Whose bedroom?

7 A. Master bedroom. Mr. Epstein's room.

8 Q. Mr. Epstein's bedroom was changed?

9 A. Yes.

10 Q. In what way?

11 A. The ceiling was different.

12 Q. How?

13 A. They somehow -- the different shape. There
14 was a flat one and they somehow, the designer figured
15 out how to make different ceiling. You know, it's not a
16 flat. It's sort of like I would say a rectangle.

17 Q. Okay.

18 A. And the room leading to the master bedroom is
19 also ceiling reconstruct.

20 Q. Okay. That's the little --

21 A. It's not a flat. It's like a -- the one room
22 leading to the master bedroom.

23 Q. Right now it has starfish in it, that one?

24 A. Right, right.

25 Q. It's like a little hallway type room?

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1 A. Yes, yes.

2 Q. How, how is that room changed?

3 A. Before the ceiling was flat. Now it's sort of
4 like a, like a --

5 Q. So, the change was to the ceiling?

6 A. Yes.

7 Q. Okay. What other changes?

8 A. Swimming pool is bigger. The cabana has been
9 extended. There has been built a wall on the south side
10 of the property.

11 Q. A wall on the south side of the property?

12 A. Right.

13 Q. When was that done?

14 A. During the reconstruction of the house at the
15 same time, and I guess that's it.

16 Q. Okay. When you walk in through -- when
17 these young females would come for the purposes of
18 giving massages, would they -- typically they would
19 go to the back door near the kitchen, right?

20 A. Yes.

21 MR. GOLDBERGER: Form.

22 BY MR. EDWARDS:

23 Q. And then when you walk in the kitchen as I
24 remember, you walk in the door and then you take a
25 left and you're in the kitchen, right? You walk in

1 that back door and then you take a left and you're
2 in the kitchen?

3 A. Right.

4 Q. And then there on your right-hand side as
5 you walk in the kitchen, there are several what
6 appear to be closets but one of them is a stairwell,
7 right?

8 A. Correct.

9 Q. Back in 2005 was there -- did that
10 stairwell still have a door you opened and you go up
11 the stairs?

12 A. Yes.

13 Q. That hasn't changed?

14 A. No.

15 Q. And at the top of the stairs it seemed to
16 me I guess that it curves a little bit to the left
17 as you walk up the stairs.

18 A. Right.

19 Q. And then at the top there is another door.
20 You open it and you step out onto the second floor?

21 A. Yes.

22 Q. And then if you make a right, you walk
23 past the other circular stairwell and you walk into
24 that hallway that now has the starfish in it?

25 A. Correct.

1 Q. And then you continue on and you're in
2 Mr. Epstein's bedroom?

3 A. Yes.

4 Q. On each side of his bed there is a
5 bathroom area. One is a shower and sauna maybe?

6 A. Right.

7 Q. And that's if you're facing his bed, it's
8 on the right side?

9 A. Yes.

10 Q. And inside that room with the shower and
11 the sauna, is that where the massage table was
12 always laid out?

13 A. I assume. When I mention --

14 Q. When you saw it.

15 A. It was in this room.

16 Q. Okay. I am not going to ask you to guess
17 about anything. I just want to know when you saw
18 it, was that where the table was?

19 A. Yes, yes.

20 Q. All right. So, when the -- let's say
21 [REDACTED], for instance, would come over and you would
22 tell [REDACTED] that she's here, would [REDACTED] then walk
23 her up that stairway that comes out of the kitchen?

24 A. Yes.

25 Q. And then at that point you just went about

1 doing your own business?

2 A. Correct.

3 Q. And then later that afternoon or the
4 following day there might be [REDACTED] or some other
5 young female that was there to also give Mr. Epstein
6 a massage?

7 A. Right.

8 Q. And do you remember how many different
9 females, young females that were there to give him a
10 massage -- I don't know what else to call them so
11 that we both understand each other -- do you
12 remember how many that you saw during your
13 employment with Mr. Epstein?

14 MR. GOLDBERGER: Form.

15 THE WITNESS: How many?

16 BY MR. EDWARDS:

17 Q. Yeah. I mean are we talking about 20 or
18 are we talking about 100, or are we talking about,
19 you know?

20 A. I would say from my perspective between 10 and
21 15 I would say differently.

22 Q. And the time period that you remember --
23 do they still come to the house?

24 A. No.

25 Q. Since Mr. Epstein has been on house

1 arrest, have you noticed any young females there to
2 give him a massage?

3 A. No.

4 MR. GOLDBERGER: Form.

5 BY MR. EDWARDS:

6 Q. All right. While he was in jail but on
7 work release, did Mr. Epstein ever go to the house?

8 A. On the work release?

9 Q. When he was on work release --

10 A. Right.

11 Q. -- did he have occasion to visit the
12 house?

13 A. No, no.

14 Q. Okay. He --

15 A. No. I think he was visiting his office. The
16 only thing he was visiting was his office.

17 Q. His office in West Palm Beach?

18 A. Yes, yes.

19 Q. Which is actually in this building, right?

20 A. Yes, yes.

21 Q. So, the period of time, just so that I
22 understand when you would see these young females
23 coming to the house to give him a massage, was from
24 February of 2005, around when you started, through
25 what point in time?

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EFTA00158292

1 A. When police raided the house and confiscated
2 all the stuff, and I guess that was the end of the
3 visiting.

4 Q. When you say --

5 THE COURT REPORTER: The end of the
6 visiting?

7 THE WITNESS: Visiting.

8 BY MR. EDWARDS:

9 Q. The end of the visiting by these young
10 females?

11 A. Yes.

12 MR. GOLDBERGER: Form.

13 BY MR. EDWARDS:

14 Q. Okay. Well, I mean, after that point in
15 time he has had other visitors in the house, right?
16 You're just talking about no more visiting from the
17 young females that were there to give him a massage?

18 MR. GOLDBERGER: Form.

19 THE WITNESS: Yes.

20 BY MR. EDWARDS:

21 Q. Okay. So, your testimony is that these
22 young females providing Mr. Epstein a massage, as
23 you were told, occurred from the point in time when
24 you started working in February of 2005 through the
25 time that the search warrant was executed on his

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EFTA00158293

1 house?

2 A. Correct.

3 Q. And have you known Mr. Epstein to receive
4 a message since the search warrant was executed on
5 his house?

6 A. No, I don't remember.

7 Q. You don't remember or it hasn't happened?

8 A. I don't remember. Well, he, he didn't visit
9 the house, I guess, after search warrant.

10 Q. Okay. After the search warrant was
11 executed, where did he go, Mr. Epstein?

12 A. I think he spent time in New York.

13 Q. Okay.

14 A. I don't remember visiting him. Maybe once.

15 Q. Okay. So, then is it also your testimony
16 that not only was the visiting from the young
17 females ended at the point in time of the search
18 warrant, but Mr. Epstein, after the search warrant
19 was executed, he didn't stay at the house until he
20 was out of his office jail sentence and on house
21 arrest?

22 MR. GOLDBERGER: Form.

23 THE WITNESS: I mean after this the house
24 has been under renovation, so there was nothing
25 going on.

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EFTA_00006709

EFTA00158294

1 BY MR. EDWARDS:

2 Q. I understand there may be some other
3 reasons for it. I'm just trying to get a time
4 period when Mr. Epstein was gone from the house.

5 A. Right.

6 Q. And I'm understanding your testimony as
7 from the search warrant being executed to the point
8 in time where he is on house arrest and now living
9 at that house, he was not at the house for you to
10 observe him?

11 A. Yes.

12 Q. That's true?

13 A. True.

14 Q. Okay. So, during that period of time,
15 it's your belief that he was living in New York or
16 somewhere else?

17 A. Correct.

18 Q. Okay. And do you know the housekeeper in
19 New York? Or the house manager in New York, sorry?

20 A. Yes, rich Barnett.

21 Q. Rich Barnett?

22 A. Yeah, Barnett. B-a-r, Barnett. I don't know
23 how to spell it.

24 Q. Okay. Have you talked to him?

25 A. Yes. I met him a few times when I was there.

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EFTA_00006710

EFTA00158295

1 Q. Okay. Do you know whether Mr. Epstein had
2 any massages when he was staying in New York in the
3 time period after the search warrant was executed
4 and before he was released on house arrest?

5 A. I don't know.

6 Q. Okay. That, is that a topic that you have
7 discussed with Rich Barnett?

8 A. No.

9 Q. All right. As you noticed different
10 underage -- sorry, strike that. As you noticed
11 different young females coming with frequency to
12 Mr. Epstein's house to provide him a massage, did
13 you ever question why they were coming?

14 A. No.

15 MR. GOLDBERGER: Form.

16 BY MR. EDWARDS:

17 Q. Do you know how Mr. Epstein knew or met
18 these young females?

19 A. No.

20 MR. GOLDBERGER: Form.

21 BY MR. EDWARDS:

22 Q. Did you tell anybody about these young
23 females coming to the house to provide Mr. Epstein a
24 massage prior to the search warrant being executed?

25 MR. GOLDBERGER: Form.

1 THE WITNESS: No.

2 BY MR. EDWARDS:

3 Q. Did you have any knowledge of what was
4 going on inside the bedroom with these young females
5 and Mr. Epstein?

6 MR. GOLDBERGER: Form.

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q. Did anybody in the house, [REDACTED], [REDACTED],
10 [REDACTED], anybody else in the house back in 2005 and
11 before the search warrant was executed, speak about
12 the purpose for these young females to be at the
13 house?

14 A. A massage.

15 Q. That's the only thing that was ever said?

16 A. Yes.

17 MR. MERMELSTEIN: Brad, would you mind if
18 we could take a break for a few minutes?

19 MR. EDWARDS: That's fine. We can take a
20 break.

21 (A brief recess was held.)

22 BY MR. EDWARDS:

23 Q. When was the first time that you were told
24 that there was something more than a massage going
25 on inside the bedroom with Mr. Epstein?

1 MR. GOLDBERGER: Form.

2 THE WITNESS: Nobody told me nothing about
3 this.

4 BY MR. EDWARDS:

5 Q. Well, at some point in time the police
6 talked to you, didn't they?

7 A. No, they didn't talk to me. They just show
8 up.

9 Q. Oh, really?

10 A. Yeah. And they read me a piece of paper that
11 they have a search warrant issue by the judge and this
12 was the only moment I, I learn what was going on and --

13 Q. That's what I am saying. I'm not
14 saying -- I asked a bad question or there was some
15 miscommunication. I don't mean did somebody -- did
16 Mr. Epstein or [REDACTED] or one of them tell you what
17 was going inside the bedroom. I'm not asking that.
18 You already told me that the only thing that they
19 ever told you was that it was a massage.

20 A. Right.

21 Q. Okay. I am saying when is the first time
22 that anybody including the police, U.S. Attorney's
23 office, FBI, whoever you talked to, when was the
24 first time that anybody else told you that there was
25 something more than a massage going on inside

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EFTA_00006713

EFTA00158298

1 Mr. Epstein's bedroom with these young females that
2 were there to, as you learned or were told, to give
3 him a massage? When was the first time?

4 MR. GOLDBERGER: Form, form.

5 THE WITNESS: The moment they were in the
6 house that they show up that it was the purpose
7 of the search warrant. So, this is when I
8 learn. Before that I didn't know anything
9 about what was going on beside the massage.

10 BY MR. EDWARDS:

11 Q. All right. It looks like by the police
12 report, and this is an 87 page police, Palm Beach
13 Police Department Incident Report, says on
14 October 20th, 2005, at 9:36, the Investigations Unit
15 executed a search warrant and as we entered onto the
16 property, we encountered the house manager, Janusz,
17 who was in the guest portion of the house?

18 A. Right.

19 Q. And you remember that --

20 A. Yes.

21 Q. -- when they executed the search warrant.

22 And what do you recall exactly happening when they
23 were executing the search warrant? Who approached
24 you? What did they show you?

25 A. I was at that time at my desk doing my

1 paperwork. And I saw through the window a couple
2 uniform -- I would say not uniform but with the badges
3 on their chest, guys. And they entered my office and
4 they introduced themselves and they told me that they
5 have a search warrant for the property.

6 So, they ask me to step outside and they
7 put me in the front of the wall and videotape
8 reading search warrant for me.

9 Q. They read the search warrant to you?

10 A. Right.

11 Q. And when they first arrived to the
12 house -- obviously when police all arrive at the
13 house, it tells you that they have reason to believe
14 that something illegal had happened there?

15 A. Correct.

16 MR. GOLDBERGER: Form, form.

17 BY MR. EDWARDS:

18 Q. I mean, that's, from your observations and
19 your knowledge you knew that the police believed
20 something illegal had happened in the house?

21 MR. GOLDBERGER: Form.

22 THE WITNESS: Right.

23 BY MR. EDWARDS:

24 Q. And at that moment when you see these
25 police at the house executing a search warrant, did

1 you know exactly what it was that they were there
2 for?

3 A. No.

4 Q. So, in your mind it could have been
5 somebody killed somebody or there were drugs or
6 anything; you had no idea?

7 MR. GOLDBERGER: Form.

8 THE WITNESS: Right.

9 BY MR. EDWARDS:

10 Q. But you had observed over a period of time
11 with great frequency these young females coming to
12 Mr. Epstein's house, right?

13 A. Right.

14 MR. GOLDBERGER: Form.

15 BY MR. EDWARDS:

16 Q. And did something go off in your mind that
17 something about that must be why the police are
18 here?

19 MR. GOLDBERGER: Form.

20 THE WITNESS: No.

21 BY MR. EDWARDS:

22 Q. Okay. Well, that's -- you would agree?

23 A. I am sorry. I was shocked when I saw them.

24 Q. Okay. You were shocked. Well, weren't
25 you told prior to the search warrant being executed

1 that police at some point in time would be coming to
2 the house?

3 A. No.

4 Q. You weren't?

5 A. No.

6 Q. All right. Do you remember there being
7 computers, a lot of computers in the house prior,
8 sometime prior to the search warrant being executed?

9 A. Yes, yes.

10 Q. And at the time the search warrant was
11 executed those computers had already been removed
12 from the house, right?

13 A. Right.

14 Q. It was -- they were removed from the house
15 within a month of the search warrant being executed,
16 do you remember that?

17 MR. GOLDBERGER: Form.

18 THE WITNESS: I don't remember exactly how
19 long before, but yes.

20 BY MR. EDWARDS:

21 Q. Do you know why they were removed from the
22 house?

23 A. No.

24 Q. Were you told why computers were being
25 taken out of the house when they were taken?

1 A. (Witness shakes head.)

2 Q. And I'm sorry.

3 A. No.

4 Q. I understood you when you shook your head.

5 A. I realize what you told me but I am sorry.

6 Q. I told you it was easy to forget.

7 Do you remember who it was that personally
8 removed the computers and equipment from the
9 property? Was it Mr. Epstein, was it a lawyer, was
10 it, do you remember?

11 A. It was [REDACTED].

12 Q. All right. And I am of the understanding
13 that there were several computers that were removed
14 from the house, correct?

15 MR. GOLDBERGER: Form.

16 THE WITNESS: Yes, three of them.

17 BY MR. EDWARDS:

18 Q. Three? And to your knowledge [REDACTED]
19 removed all of them?

20 A. She show up one day with gentleman. I don't
21 remember his name. And she told me that they are moving
22 out those computers.

23 Q. And where were the computers? Which rooms
24 were the computers in that were removed by [REDACTED]
25 and this gentleman you're describing?

1 A. One was in cabana. One, the other second one
2 was in living room and one was in small office next to
3 the kitchen.

4 Q. All right. In your time at the house
5 prior to that, is it fair to say those computers had
6 never been removed before?

7 A. I remember that there was to bring some new
8 ones to replace them at some point. I don't know
9 remember exactly if it was for upgrading, but they
10 change computers very often I would say.

11 Q. All right. But the computers -- the
12 removal by [REDACTED] and this individual, that wasn't
13 done -- we're talking about a different -- that's
14 not a time where they were replacing computers.
15 This was just removing computers from the house?

16 A. Yes.

17 Q. And did you receive any explanation as to
18 why the computers were being removed from the house?

19 A. No.

20 Q. Did you ever have occasion to use any of
21 the three computers that were removed from the
22 house?

23 A. No. I never, I never, you know, touch them,
24 never use them. I have my own computer in my office, so
25 I use this computer.

1 Q. Is your computer in your office --

2 A. Yes.

3 Q. Let me finish. Is the computer in your
4 office linked up with the three computers that were
5 removed from the house? Meaning, can you look at
6 the system and see what is on those three computers?

7 A. No, no.

8 Q. Is it your understanding that those three
9 computers are linked with one another or do you
10 know?

11 A. I don't know, but I, I doubt it. They are
12 separate I guess.

13 Q. Okay. Were you aware that Mr. Epstein
14 used a Citrix program to link various computers?
15 Did you know that?

16 A. Yeah. I use Citrix too in my computer for
17 exchanging e-mails and get through Internet.

18 Q. Okay. So, is it your understanding that
19 the only connection then through Citrix with these
20 computers, these various computers that were in
21 Mr. Epstein's home, was for e-mail purposes?

22 A. Yes.

23 Q. Okay. To your knowledge, you're not
24 familiar with those computers sharing other files or
25 information?

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1 A. No.

2 Q. That's not something that you were, you
3 were privy to? You weren't, you weren't in the loop
4 of the sharing of information in the house in terms
5 of the computers being connected through any server?

6 A. I don't really know what, how, how to answer
7 your question because Citrix is for the whole
8 organization to exchange e-mail between employees.

9 Q. All right. You used the term?

10 A. So, even my computer is connected to Citrix.
11 I can receive mail and I can e-mail information to
12 employee within organization. But I don't know if you
13 can see to each computer what is going on on another
14 computer.

15 Q. You don't know about --

16 A. Is that your question?

17 Q. You don't know about shared files?

18 A. No.

19 Q. You only know that the one computer can
20 e-mail the other?

21 A. Right.

22 Q. But that can happen with any two computers
23 in the world pretty much. You can send e-mails to
24 each other, right.

25 A. Yes.

1 Q. You have used the term organization, you
2 can share within the organization. What do you --
3 just so I can understand what you're calling the
4 organization, what do you mean by that word?

5 A. People employed by Jeffrey Epstein. There are
6 a few groups of people, his office in New York and I
7 guess --

8 Q. Who are those people by name that you
9 would consider within the Jeffrey Epstein
10 organization?

11 A. His accountant, his --

12 Q. Who is that?

13 A. Bella Klen.

14 Q. What is it?

15 A. Bella Klen. K-l-i-n. E-n, I'm sorry.

16 Q. Bella, B-e-l-l-a?

17 A. Yes.

18 Q. Is that somebody in New York?

19 A. Yes.

20 Q. Is that a male or female?

21 A. Female.

22 Q. And you understand that's his accountant?

23 A. Right.

24 MR. GOLDBERGER: Just to get the spelling
25 correct is it K-l-e-i-n?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 THE WITNESS: K-l-e-n.

2 MR. MERMELSTEIN: K-l-e-n.

3 BY MR. EDWARDS:

4 Q. And in addition to Bella Klen, who else
5 would you have considered to be in Jeffrey Epstein's
6 organization?

7 A. Rich Kahn. Richard Kahn.

8 Q. And how do you spell the last name?

9 A. K-a-h-n.

10 Q. And where is he located?

11 A. New York office.

12 Q. What does he do?

13 A. I guess he was involved with the accounting.

14 Q. And who else?

15 A. Leslie. I would think I would say secretary.

16 Q. Leslie Groff?

17 A. Yes.

18 Q. And is she also in the New York office?

19 A. Yes.

20 Q. What do you understand her role to be?

21 A. Secretary I would say.

22 Q. Did she also schedule appointments for
23 these young females to come to Jeffrey Epstein's
24 house?

25 MR. GOLDBERGER: Form.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 THE WITNESS: I don't know.

2 BY MR. EDWARDS:

3 Q. We'll go back to that but I tell you why I
4 ask. If you don't know then you don't know, but in
5 the course of Mr. Epstein's -- you're aware that he
6 did plead guilty to a couple felonies in state
7 court, right?

8 A. Right.

9 Q. Well, in the course of the negotiation
10 with the federal government and the U.S. Attorney's
11 Office, they, the agreement between Mr. Epstein and
12 the U.S. Attorney's office mentions people that are
13 called co-conspirators of Epstein. And Leslie Groff
14 is named as one of those co-conspirators.

15 Do you know what involvement, if any, that
16 she had with the crimes that were being
17 investigated?

18 A. No.

19 Q. Okay.

20 A. I am not aware of this.

21 Q. Okay. The other people mentioned as
22 co-conspirators are [REDACTED], [REDACTED], [REDACTED], and
23 [REDACTED]. So we'll get to them in a minute
24 but first just so we stay on the track of who was in
25 the organization, is [REDACTED], [REDACTED], [REDACTED] and

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 [REDACTED] [REDACTED] all people that you would also
2 consider within the organization?

3 A. Yes.

4 Q. Okay. So, we just added three more names
5 to it. Who else would you consider, Ghislaine
6 Maxwell?

7 A. Yes.

8 Q. And who else?

9 A. Who was working there?

10 Q. Bella, Richard Kahn, Leslie Groff,
11 Ghislaine Maxwell, [REDACTED], [REDACTED], [REDACTED].

12 A. I think Harry was involved with the
13 accounting.

14 Q. Okay.

15 A. I don't recall his last name.

16 Q. Somebody else involved with the
17 accounting?

18 A. Yes.

19 Q. Okay. Any of those people that you just
20 named, were any of those people that you just named
21 the person that you described as the gentleman that
22 assisted [REDACTED] in removing the computers from the
23 house prior to the search warrant being executed?

24 A. No. You mean the one who show up to do those
25 computers?

1 Q. Right. The one who helped [REDACTED] move
2 it.

3 A. No, it wasn't.

4 Q. Had you ever seen that individual on the
5 property, on Mr. Epstein's property at 358 Albrillo
6 Way prior to him assisting [REDACTED] in removing the
7 computers from the home?

8 A. No.

9 Q. That was their first time seeing him?

10 A. Yes.

11 Q. Had you ever seen him since that date?

12 A. No.

13 Q. And to this date you don't know who that
14 individual was?

15 A. No.

16 Q. Were you told that the -- let me rephrase
17 that. I guess you told me that anything that
18 happened in the home in terms of guests coming over
19 or things of that nature, you would be forewarned
20 about it, right?

21 A. Right.

22 Q. So, when was the first time that you
23 learned that [REDACTED] and some gentleman that you had
24 never met would be coming to the home to remove the
25 computers?

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1 A. I got the phone call from her that there would
2 be -- I don't know what time it was in the house in
3 certain time and they would pick up those computers.

4 Q. Okay. And you got a phone call from
5 ██████████?

6 A. Right.

7 Q. Why were you called by ██████████ to tell you
8 that ██████████ and would be coming over to, with some
9 other gentleman to remove the computers. Do you
10 know why you were told that?

11 A. No.

12 Q. Would ██████████ call every time she would
13 come over?

14 A. Yes.

15 Q. Okay.

16 A. I mean, any, any time coming to the house,
17 they always let me know who is coming when they are
18 arriving or whatever.

19 Q. Back in 2000, sorry.

20 A. I said even if Jeffrey Epstein arriving at the
21 house, I always know what time and which day he would be
22 here or another person, so I would be aware of what was
23 going on and I would be prepared.

24 Q. Who besides you back in 2005 lived at the
25 house full time; just you?

1 A. Just me.

2 Q. All right. And then if [REDACTED] was coming
3 into town or [REDACTED] or [REDACTED] or Jeffrey Epstein,
4 then you would be called and told who was coming so
5 that you could get the house ready for whoever it
6 was?

7 A. Right.

8 Q. And if any other guests were visiting,
9 would you also be given their names as people who
10 would be at the house?

11 A. Yes.

12 Q. So, as house manager you were apprized of
13 whatever the ongoings were going to be at the house
14 and who was going to be there?

15 A. Right.

16 Q. Okay. In addition to the three computers
17 that [REDACTED] and this other gentleman removed from
18 the home, what else did you witness or observe being
19 removed from the home?

20 A. Nothing. The only thing that had been removed
21 is when the police got with the search warrant. They
22 removed a lot of stuff. But when [REDACTED] showed up with
23 the gentleman, they took only the computers.

24 Q. Okay. And if you began the work there in
25 February 2005 and the police report indicates the

1 search warrant was executed in October of 2005,
2 October 20th, 2005, when in that period of time were
3 the computers removed from the home by [REDACTED] and
4 this gentleman? And by that I don't mean the exact
5 date unless you know the exact date.

6 A. No, I don't.

7 Q. A week before the search warrant, two
8 months before, a week, you know, whatever you're --

9 A. I would say maybe month or two months. I
10 really don't recall exactly but a couple of months,
11 maybe one month before search warrant.

12 Q. All right. So, to the best of your
13 recollection it could have been sometime early in
14 October. It could have been September. It could
15 have even been, as you're remembering it, as far
16 back as August?

17 A. Correct.

18 Q. Okay. And after the computers were
19 removed from the home, were any computers -- no
20 computers were put in its place, right?

21 A. No.

22 Q. During -- when you first started working
23 there, did you know that there were surveillance
24 cameras inside the home?

25 A. No, I was not aware.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 Q. When was the first time that you learned
2 that the home was equipped with internal
3 surveillance cameras?

4 A. When, when I was questioned by FBI. One of
5 the questions was if I was aware that there was camera
6 in the house so I was surprised. I didn't know.

7 Q. Okay.

8 A. So, this is what I learned that there was
9 something before that I have no idea.

10 Q. Okay. So, subsequent to being asked that
11 question, then did you go and determine where these
12 cameras were inside the home?

13 A. No.

14 Q. You never did?

15 A. No.

16 Q. Okay?

17 A. I never knew what was going, what install, in
18 which place and how they operate, who use them.

19 Q. Today do you know where the hidden cameras
20 are inside the home?

21 A. Yes, yes. No, I mean there is no surveillance
22 cameras right now, I mean, to my knowledge.

23 Q. Okay.

24 A. But I learned that they were, that they were
25 before. Yeah, I think I read in the paper.

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1 Q. In the paper, you mean the police report?

2 A. No, in the newspaper.

3 Q. The newspaper?

4 A. Yes.

5 Q. It indicated where the surveillance
6 cameras were inside the house?

7 A. Yes.

8 Q. I didn't know that. I haven't seen the
9 paper.

10 A. In New York, or Palm Beach Post.

11 Q. Okay. So, that's a couple of references
12 to the newspaper, you reading things. When was it
13 that you started reading up on what was going on
14 inside the house and the articles related to Jeffrey
15 Epstein? When did you first start doing that?

16 A. After, after the arrest.

17 Q. Okay. So, for the first eight or nine
18 months that you were working there leading up to the
19 search warrant, did you ever go on the Internet or
20 try to learn who your boss was, who you were working
21 for about Mr. Epstein?

22 A. Yes.

23 Q. Okay. And that was just out of curiosity
24 so you knew what he did?

25 A. No. I mean there was curiosity because before

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 I took the job, I didn't know about nothing about
2 Jeffrey Epstein. So I try too figure out, you know, who
3 he is, who, what he is doing. So I check Internet and I
4 find articles about him. I guess financial and he
5 invest money for other people.

6 Q. Okay. That's something that you read in
7 the newspaper?

8 A. Yes.

9 Q. Did you ever learn through personal
10 knowledge, observations, things of that nature who
11 any of Jeffrey Epstein's clients were?

12 A. No.

13 Q. Did you ever hear the name Leslie Wexner?

14 A. Yes.

15 Q. Do you know Leslie Wexner?

16 A. I know the name but I never met him, never
17 talked to him just the name.

18 Q. Since February of 2005 he has never been
19 to the home to your knowledge?

20 A. No.

21 Q. All right. Do you know what Mr. Epstein's
22 relationship was to Mr. Wexner from anything you
23 ever heard around the house or observed?

24 A. No.

25 Q. All right. And you say today there is no

1 surveillance, to your knowledge in the home. But
2 sometime during or just after the search warrant was
3 executed and you started talking with somebody from
4 the FBI, they informed you that there were
5 surveillance cameras inside the home?

6 A. I mean they didn't inform me. They ask me if
7 I am aware that they are.

8 Q. Okay. Where did you ultimately learn that
9 the surveillance cameras were inside the home?

10 A. Like I mention, I read this article in the
11 paper and they mentioned there was one in the garage.

12 Q. Okay.

13 A. And one in the living room and two in the
14 clock.

15 Q. Okay.

16 A. So those two.

17 Q. In addition to those two, have you ever
18 learned of additional surveillance cameras inside
19 the home?

20 A. No.

21 Q. All right. Are you aware of a
22 surveillance camera that was set up inside the
23 office?

24 A. No.

25 Q. And have you in your entire time at the

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 house seen sex toys or vibrators or things of that
2 nature?

3 A. No.

4 Q. Have you ever spoken with [REDACTED] [REDACTED]
5 about these young females that would visit the
6 house?

7 MR. GOLDBERGER: Form.

8 THE WITNESS: I mean, we didn't spoke. We
9 just exchange sometimes when I was away from
10 the house doing shopping or doing stuff, she
11 was the one who let them in. So, sometimes
12 when I was, knew who was coming and what time,
13 I let her know that this person is coming at a
14 certain time so she knows what to do.

15 BY MR. EDWARDS:

16 Q. Given that you observed these young
17 females and different females coming to the house,
18 with great frequency, at some point in time at least
19 in your mind you -- did you ever think, hey, this is
20 unusual, this is unusual behavior?

21 MR. GOLDBERGER: Form.

22 THE WITNESS: Well, you know, I didn't
23 question anything. It's not my job.

24 BY MR. EDWARDS:

25 Q. It's not your job?

1 A. Not my job. I just do my job and at some
2 point when who shows up is not to me to question.

3 Q. Well, oftentimes this would be somebody
4 arriving in a taxicab or something, right?

5 A. Yeah, on a few occasion, right.

6 Q. Did you ever call the taxicab for them?

7 A. I think in once, one case I call taxicab to, I
8 think to pick up somebody from the house and take this
9 person to the place she was coming from.

10 Q. Okay. You called a taxicab to tell the
11 taxicab pick up this person from this address and
12 take them to 358 Albrillo Way?

13 A. No. To 358 Albrillo Way. I pick up, I call
14 taxi for, pick up from the house. I didn't call --

15 Q. Oh, okay. I gotcha.

16 A. To bring somebody here.

17 Q. To leave the house?

18 A. To leave the house, right.

19 Q. Did you ever have occasion to either pick
20 one of these young females up from her home or drive
21 her home from Albrillo way?

22 MR. GOLDBERGER: Form.

23 THE WITNESS: No.

24 BY MR. EDWARDS:

25 Q. That's not something you were ever asked

1 to do?

2 A. No.

3 Q. And have you ever read or learned of --
4 strike that. Have you ever read the police incident
5 report where it is the detective on the criminal
6 case taking statements from several of these young
7 females about what actually went on in the bedroom?

8 MR. GOLDBERGER: Form.

9 THE WITNESS: No.

10 BY MR. EDWARDS:

11 Q. After the search warrant was executed you
12 did indicate that you were interested and read
13 newspapers articles, right?

14 A. Yes.

15 Q. So, you're aware of the allegations that
16 have been made as to what was going on inside the
17 bedroom?

18 A. Yes.

19 Q. All right. And you're also aware that
20 obviously at some point in time Jeffrey Epstein pled
21 guilty to two felonies that led to him going to jail
22 and he was on house arrest for a certain period of
23 time?

24 A. Yes.

25 Q. And do you remember ever meeting any of

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EFTA_00006736

EFTA00158321

1 the girls that were the victims in the cases where
2 Mr. Epstein pled guilty to?

3 MR. GOLDBERGER: Form.

4 THE WITNESS: No.

5 BY MR. EDWARDS:

6 Q. All right. Do you remember a girl named
7 S.G.?

8 A. No.

9 Q. Do you remember a girl named [REDACTED].?

10 A. No.

11 Q. Do you remember a girl and I don't have
12 her last name right now, I mean her first name right
13 now. First initial is [REDACTED] I don't remember her
14 first name but her last name is [REDACTED]?

15 A. No.

16 Q. Did you ever clean up in the massage room
17 after these alleged massages took place?

18 MR. GOLDBERGER: Form.

19 THE WITNESS: Yeah. I mean, I not --

20 clean up on a few occasion. I pick up towels
21 and I fold the massage table up and put back in
22 the closet.

23 BY MR. EDWARDS:

24 Q. Okay. During the investigation, the
25 criminal investigation, how many times, well, strike

1 that. When was the first time that you spoke with a
2 police officer related to the case?

3 A. First time when they show up in the house.

4 Q. Did they interview you that day?

5 A. They supposed to interview me but I guess they
6 didn't have a time or didn't have a chance. But next
7 day one of them show up at the house and ask me if he
8 can ask me a few question.

9 Q. And do you remember the name of that
10 detective?

11 A. [REDACTED].

12 Q. [REDACTED]?

13 A. [REDACTED], something like that.

14 Q. And you talked to him that day?

15 A. No.

16 Q. You did not?

17 A. No.

18 Q. What did you tell him?

19 A. That I don't want to answer any question I
20 would say without, without a lawyer.

21 Q. And why is that?

22 A. I don't know.

23 Q. Okay. But I mean what we have talked
24 about today it sounds like you didn't really know
25 anything, right?

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EFTA_00006738

EFTA00158323

1 A. Yeah. But at that point, you know, I was a
2 little bit, you know, afraid to what was going on. And
3 I wouldn't answer any question without a lawyer.
4 Besides they took my computer and some personal
5 belonging from, from my room.

6 Q. Okay. In addition to your computer what
7 other personal belongings did they take?

8 A. They took some CD and some storage file from
9 my computer. They, you know, ransacked my, my room
10 completely, open all the boxes and turned the room
11 upside down. So, I wasn't, you know, sure what to do.
12 So I told him I don't want to talk to you without
13 present of my lawyer.

14 Q. And is that something that you were
15 instructed to tell the police if they came back to
16 talk to you, that you would like to have a lawyer
17 present?

18 A. No.

19 MR. GOLDBERGER: Form.

20 THE WITNESS: No, just my decision.

21 BY MR. EDWARDS:

22 Q. All right. And did you go and hire a
23 lawyer?

24 A. I mention -- I mean Mr. Epstein lawyer, they
25 question me what happened during --

1 MR. GOLDBERGER: Don't, don't, whoa, whoa,
2 whoa. Don't answer.

3 MR. EDWARDS: I don't want to know
4 anything that you said to your lawyer or your
5 lawyer said to you, none of that. I only want
6 to know any dialogue that you had with, right
7 now we're talking about the first or second or
8 third police officer that you talked to about
9 the case. Do you understand that? I don't
10 want you to tell me what you said to your
11 lawyer.

12 THE WITNESS: Right, right.

13 BY MR. EDWARDS:

14 Q. That's a privilege communication I am not
15 interested in. I may be interested in it but I am
16 not entitled to it.

17 So, you talked to a police officer and
18 your lawyer may have been present when you did that.
19 Who was your lawyer when you did that?

20 A. Mike Salmick.

21 Q. Mike Salmick?

22 A. (Nods head.)

23 Q. Okay. And is that somebody who was hired
24 for you by Jeffrey Epstein?

25 A. Yes.

1 Q. It was somebody that was paid by Jeffrey
2 Epstein?

3 A. Yes.

4 Q. When did the conversation come up between
5 you and Jeffrey Epstein that he would retain a
6 lawyer for you?

7 A. His lawyer mention to me that since he cannot
8 represent me, he can find somebody for me to represent
9 me.

10 Q. And his lawyer back then was Guy Fronstin?

11 A. Yes.

12 Q. And the lawyer they found was Michael
13 Salmick and at some point in time you, with your
14 lawyer, speak to the police?

15 A. Actually I got subpoena from FBI.

16 Q. Okay.

17 A. And they question me.

18 Q. And where did they question you?

19 A. There is FBI office on --

20 Q. Sure.

21 A. Right here.

22 Q. Sure. And was it just you and the FBI in
23 an office?

24 A. Yes.

25 Q. And what did you tell the FBI relating --

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 let me backup. I am assuming that they were asking
2 you questions about the young females that were
3 coming to the house?

4 MR. GOLDBERGER: Form.

5 THE WITNESS: Yes.

6 BY MR. EDWARDS:

7 Q. Okay. I mean that's the only subject
8 matter that they were interested in related to
9 possible illegal activities in the house, right?

10 A. Right.

11 Q. So, what did you tell them relative to
12 your knowledge regarding these young females that
13 were coming to Jeffrey Epstein's house when he was
14 in town?

15 A. Same thing like you are, similar question you
16 were asking me.

17 Q. You told them you saw them coming and you
18 believed that they were there to give a massage?

19 A. They were coming, they were leaving the house
20 after finishing.

21 Q. After they finished the massage?

22 A. Right.

23 Q. And did they ask you, you know, did you
24 really believe that they were giving a massage to
25 him or did you believe other things were going on?

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EFTA_00006742

EFTA00158327

1 I mean, were those kind of questions asked?

2 MR. GOLDBERGER: Form.

3 THE WITNESS: I mean, I don't even
4 remember, you know, what was what, how they,
5 you know, questioned me, but similar questions
6 that you are asking me right now.

7 BY MR. EDWARDS:

8 Q. All right. And similar to what you are
9 telling me today, you don't really know what was
10 happening up in the bedroom, right?

11 A. Yes.

12 Q. And it's really your job to find out?

13 A. Right.

14 Q. You work for Mr. Epstein and that's your
15 boss, and he pays you and that's all you know?

16 A. Yes.

17 Q. All right. After that conversation with
18 the FBI, were you later subpoenaed to testify before
19 the grand jury?

20 A. No.

21 Q. Did you ever talk to an assistant U.S.
22 Attorney named [REDACTED]?

23 A. No.

24 Q. So, the only communication that you ever
25 had with law enforcement was this meeting that you

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EFTA_00006743

EFTA00158328

1 had with the FBI?

2 A. Right. It was like three of them or four of
3 them.

4 Q. And did --

5 A. I forget the name.

6 Q. And they taped that statement, right, the
7 conversation, didn't they?

8 A. Tape?

9 Q. Didn't they tape the statement?

10 A. You mean videotape?

11 Q. No. I think it was a recorder.

12 A. Yeah. I think somebody was taking notes like
13 right now. I don't remember --

14 Q. You think that?

15 A. They were taping.

16 Q. Okay. At some point in time I believe
17 that I've read somewhere that there was taped
18 interview or statement of you. I could be wrong. I
19 have read too much of this case, but, to your --

20 A. I guess they have some kind of record, I
21 assume but I don't remember.

22 Q. Okay.

23 A. It was either taping or it was, you know,
24 like, write down.

25 Q. All right. So, prior to the search

1 warrant being executed, if I understand you
2 correctly when Mr. Epstein was in town, there would
3 be a set appointment for let's say [REDACTED] and maybe in
4 the afternoon there might be one for [REDACTED] or there
5 may only be one that day or on some occasions as you
6 have said there may be no young females coming to
7 the house that day, right?

8 A. Right.

9 Q. All right. After the search warrant was
10 executed for the most part, well, after the search
11 warrant was executed, Mr. Epstein spent his time
12 somewhere else, most likely in New York?

13 A. Right.

14 Q. And then he came back down to Florida at
15 some point in time. He went over to the courthouse
16 and he pled guilty to certain felonies that were
17 charged against him. And then he went to jail and
18 you didn't see him at the house anymore?

19 A. Yes.

20 Q. And then for some period of time now, six
21 or seven months or so, he has been on house arrest
22 and so you see him in West Palm Beach?

23 A. Yes.

24 Q. Or sorry, Palm Beach. I don't know where
25 I am. And has there been occasions where you know

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 of Mr. Epstein, since he's been on house arrest to
2 not stay at the house in Palm Beach, to stay
3 elsewhere?

4 A. I think he took a couple trips to New York.

5 Q. Okay. And that was to meet with lawyers
6 on some other case you understand?

7 A. Yes.

8 Q. Do you know what that case is about?

9 A. No.

10 Q. Something had to do with money and against
11 some other company, do you know that?

12 MR. GOLDBERGER: Form.

13 THE WITNESS: No.

14 BY MR. EDWARDS:

15 Q. Have you ever heard of a corporation, of
16 DB Zwirn or something like that?

17 A. No.

18 Q. Doesn't ring a bell?

19 A. No.

20 Q. Okay. Other than the couple trips or two
21 trips to New York has he stayed at the house to the
22 best of your knowledge?

23 A. Yes.

24 Q. And were you ever familiar with where

25 [REDACTED] [REDACTED] would get the girls' name and/or would

1 keep the girls' names and numbers that were coming
2 to the house to provide massages?

3 A. No.

4 Q. You never saw them on a computer or on an
5 appointment book or anything like that?

6 A. No.

7 Q. Okay. Do you know how it was that [REDACTED]
8 would get the girls to arrive at the house at any
9 certain time?

10 A. No.

11 Q. And what was your understanding then of --
12 well, strike that. Ghislaine Maxwell was somebody
13 that visited Mr. Epstein, I think if he was in town
14 three times a month, she would be in town with him
15 one time a month, paraphrasing your testimony, but
16 that was something that continued from the time you
17 first became employed through the search warrant
18 being executed on the home, right?

19 A. Right.

20 Q. Is that somebody, that being Ghislaine
21 Maxwell, somebody that you have seen at the house
22 since Mr. Epstein has been back at 358 Albrillo Way
23 on house arrest?

24 A. Can you rephrase?

25 Q. Sure. Since Mr. Epstein -- it was a bad

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 question. Since Mr. Epstein has been back at the
2 house on house arrest, have you seen Ghislaine
3 Maxwell at the house?

4 A. No.

5 Q. Do you know if Ghislaine Maxwell and
6 Mr. Epstein still talk with one another?

7 A. Yes.

8 Q. And do they?

9 A. Yes.

10 Q. How frequently, if you know?

11 A. I don't know. She calls maybe twice asking
12 him if he is in the house.

13 Q. Why? Do you know why she calls?

14 A. No.

15 Q. Do you still contact her if you have
16 issues with the house or whatever, do you still
17 contact Ghislaine Maxwell?

18 A. No.

19 Q. You understood her to be a business
20 partner of some type back in 2005. What is your
21 understanding of Ghislaine Maxwell's relationship
22 with Mr. Epstein these days?

23 A. I don't know what is going on between them.

24 Q. Do you still think that they have a
25 business relationship of some sort?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 A. I don't know.

2 Q. Okay. And you're here obviously with an
3 attorney today, Jack Goldberger, who is also an
4 attorney for Mr. Epstein. Safe to assume that
5 Mr. Epstein retained Mr. Goldberger for you?

6 A. Yes.

7 Q. And whatever fee is being charged by
8 Mr. Goldberger, that's something that's being paid
9 by Mr. Epstein, not by you?

10 A. Right.

11 Q. Okay. And other than [REDACTED] [REDACTED]
12 serving I guess these days as somebody who you would
13 consider Mr. Epstein's girlfriend, would you
14 consider her to have some sort of business
15 relationship with Mr. Epstein as well?

16 MR. GOLDBERGER: Form.

17 THE WITNESS: I don't know.

18 BY MR. EDWARDS:

19 Q. What do you consider [REDACTED] [REDACTED] role
20 to be these days in Mr. Epstein's life?

21 A. She's his assistant. She may hold a, schedule
22 appointments.

23 Q. Okay. Well, these days Mr. Epstein's on
24 house arrest, right?

25 A. Yes.

1 Q. So, what kind of appointment is she
2 scheduling for him if you know?

3 MR. GOLDBERGER: Form.

4 THE WITNESS: I don't know. Some, for
5 example, on his trips to New York she organize
6 everything, you know, schedule whose flying to
7 New York, pick him up from, bring him to the
8 airport, pick him up from the airport, bring
9 him to the house. I guess she organize all the
10 logistic stuff involving his either trips or
11 even staying in the house.

12 BY MR. EDWARDS:

13 Q. But these are trips that he's taken I
14 think you said two or three times since, in the last
15 seven months or so right?

16 A. Right.

17 Q. But what does she do for him on the other
18 days when he's not traveling to and from New York?

19 A. I don't know.

20 Q. Okay.

21 A. To tell you the truth, I don't know.

22 Q. One of the things that she did back in
23 2005 was she scheduled his massage appointments with
24 these young females who would come to the house,
25 right?

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1 A. Yeah.

2 Q. That's obviously not something she does
3 for him anymore?

4 A. Correct.

5 Q. Okay. I mean, to the best of your
6 knowledge that doesn't happen anymore?

7 A. Yes.

8 Q. And do you know somebody named [REDACTED]
9 [REDACTED]?

10 A. Yes.

11 Q. What does -- is he employed by Jeffrey
12 Epstein?

13 A. I assume.

14 Q. What does he do for Jeffrey Epstein?

15 A. Some kind of assistant to --

16 Q. Okay.

17 A. -- to help him to paperwork, whatever.

18 Q. Since he is -- I am sorry. I didn't mean
19 to cut you off. What did you say?

20 A. I assume that he is one of those person
21 involved with organizing his, I would say life.

22 Q. Okay. And based on what observations do
23 you reach that conclusion?

24 MR. GOLDBERGER: Form.

25 THE WITNESS: I notice he calls a lot of,

1 you know, contractors to do some work around
2 the house, irrigation system, lighting,
3 landscaping.

4 BY MR. EDWARDS:

5 Q. All right. And does he come to the house
6 quite frequently?

7 A. Yes.

8 Q. All right. Does he on occasion give
9 Mr. Epstein rides places?

10 A. Yes.

11 Q. All right. So, you have observed since
12 Mr. Epstein has been on house arrest that's also
13 somebody who visited Mr. Epstein in jail while he
14 was in jail, right?

15 A. Yes, right.

16 Q. He visited him quite frequently in jail?

17 A. Yes.

18 Q. Do you know how Mr. Epstein met [REDACTED]
19 [REDACTED]?

20 A. No.

21 Q. Is [REDACTED]
22 [REDACTED] [REDACTED]?

23 A. Yes.

24 Q. And how did you know that?

25 A. How did I know that? I notice that they spend

1 a lot of time together.

2 Q. You observe them around the house and [REDACTED]
3 [REDACTED]?

4 A. Yes.

5 Q. All right. And does [REDACTED] [REDACTED] stay the
6 night at Mr. Epstein's house?

7 A. No.

8 Q. You have never seen him stay the night
9 there?

10 A. No.

11 Q. All right. And on any given week, how
12 often will [REDACTED] [REDACTED] show up to Jeffrey Epstein's
13 house or report to Jeffrey Epstein's house for work?

14 A. Currently?

15 Q. Yeah. I mean, I am talking specifically
16 about the time period since Mr. Epstein has been on
17 house arrest?

18 A. Very often.

19 Q. Every day?

20 A. Three or four times a week.

21 Q. Okay. And when you became employed with
22 Mr. Epstein, did you sign a confidentiality
23 agreement?

24 A. Yes.

25 Q. And what did that confidentiality

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 agreement say?

2 MR. GOLDBERGER: Form.

3 THE WITNESS: I don't remember to tell you
4 the truth.

5 MR. EDWARDS: Okay.

6 THE WITNESS: I would say basic
7 confidentiality agreement. I don't know
8 exactly details but from my own knowledge I not
9 supposed to release information what, what is
10 going on in the, in Mr. Epstein organization.

11 BY MR. EDWARDS:

12 Q. And when we talk about Mr. Epstein's
13 organization, we're talking about those people that
14 you told us about earlier, right?

15 A. Right.

16 Q. Okay. So, if you know information about
17 what those people are doing with one another as an
18 organization or what is going on inside the house or
19 things of that nature, based on this confidentiality
20 agreement you're not supposed to say anything?

21 A. Yes.

22 Q. And it's your understanding that [REDACTED]
23 [REDACTED] has also signed a confidentiality agreement
24 with Mr. Epstein?

25 A. No.

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1 Q. You don't know?

2 A. I don't know.

3 Q. Do you know if [REDACTED] [REDACTED] signed one?

4 A. Yes.

5 Q. How do you know that?

6 A. She told me.

7 Q. She did. Okay. Isn't that a violation of
8 the confidentiality agreement. Is it you're --
9 other than [REDACTED] [REDACTED] and yourself, do you know
10 of anybody else who signed a confidentiality
11 agreement?

12 A. No.

13 Q. Do you have a copy of the confidentiality
14 agreement?

15 A. No.

16 Q. That's something that you supposedly read
17 at some point in time, signed it and then you gave
18 it back to somebody?

19 A. Yes. I knew it would happen before I got
20 hired, so it's 2005. I know I read it. I sign it, but
21 I don't know even know if I, if I have it in my
22 possession, a copy of this agreement.

23 Q. Okay. Do you know people that used to
24 work at the house Michael and [REDACTED]?

25 A. No.

1 Q. Never heard of them?

2 A. No.

3 Q. All right. During the year 2005, what
4 other visitors do you remember frequenting the house
5 when Mr. Epstein was in town aside from [REDACTED],
6 [REDACTED], Ghislaine Maxwell, [REDACTED], yourself? Who
7 else do you remember being there?

8 A. I don't remember.

9 Q. All right. Do you know the magician David
10 Copperfield?

11 A. Yes.

12 Q. Did you see him at the house?

13 A. No.

14 Q. Never?

15 A. No, never.

16 Q. Okay. Have you seen him at the house?
17 Not just in 2005 that we're focusing on the previous
18 question, have you ever seen him at the time house?

19 A. No.

20 Q. No. Okay. Back in 2005, how about the
21 attorney Alan Dershowitz, do you remember seeing him
22 at the house?

23 A. Yes.

24 Q. And how many occasions do you believe you
25 saw him at the house?

1 A. Maybe twice.

2 Q. And on the two occasions are we talking
3 about he stayed for three days each time, or you
4 only saw him on two days if you remember?

5 A. I think it was either a couple or three days.
6 I don't remember exactly.

7 Q. Okay. So, he may have come in town two
8 times and stayed two days each time; is that what
9 you are saying?

10 A. Correct.

11 Q. Okay. And where would he stay when he was
12 at Jeffrey Epstein's house, what room?

13 A. I don't remember which room. It had like a
14 four additional bedrooms.

15 Q. Okay. And what would, you know, on the
16 occasions when Mr. Dershowitz was in the house and a
17 young female would come over to give Mr. Epstein a
18 massage, if you know, let's say the process I am
19 assuming is the same as you told us before, you
20 greet them at the door, you're told the person is
21 coming, you greet them at the door, you bring them
22 in, you let [REDACTED] know the person is there. And
23 what then did you observe or where in the house
24 would Mr. Dershowitz stay while Mr. Epstein was
25 getting this massage?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 MR. GOLDBERGER: Form.

2 THE WITNESS: I don't remember having him
3 and either young girls at the same time at the
4 house. I don't recall. I don't remember.

5 BY MR. EDWARDS:

6 Q. Okay. Fair enough. I think I presupposed
7 something that may not have been accurate. So, to
8 your recollection the two to four days that you
9 remember Mr. Dershowitz being at the house, you
10 can't say with any degree of certainty that these
11 young females were also at the house?

12 A. Yeah. Right.

13 Q. Okay. Do you remember there ever being an
14 occasion where there was some other person, aside
15 from the people that we all know regularly are at
16 Mr. Epstein's house that we have named a few times,
17 do you ever remember any other people being inside
18 the house when these young females or a young female
19 would be at the house to give Mr. Epstein a massage?

20 A. No.

21 Q. Okay. So, to the best of your
22 recollection any time that these young females were
23 at the house, it was a time when Mr. Epstein and
24 other members of the organization, as you referred
25 to it, were in the house only?

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

EFTA_00006758

EFTA00158343

1 A. Right.

2 Q. Okay. Do you know any of Mr. Epstein's
3 neighbors?

4 A. I know who lives next, I mean, across the
5 street, but I never met, I never talk with them. The
6 only thing, I talk with the guy who work for them.

7 Q. Who is the guy who worked for him?

8 A. His name is Mike.

9 Q. And when you say --

10 A. Across the street. Sometimes, you know, we
11 exchange hello, how are you doing. That's it, but I
12 don't keep any, I would say relationship with him.

13 Q. When you say the guy across the street,
14 directly across street from Mr. Epstein?

15 A. Directly across the street.

16 Q. Do you know what that person's name is who
17 owns that house?

18 A. Cunningham, last name is Cunningham, I think.

19 Q. Okay. And have you ever met that person
20 before?

21 A. No.

22 Q. Do you know of any occasion when that
23 person, Mr. Cunningham, has ever come over to
24 Mr. Epstein's house?

25 A. No.

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

EFTA_00006759

EFTA00158344

1 Q. Any occasion when Mr. Epstein has gone
2 over to Mr. Cunningham's house?

3 A. No.

4 Q. Is that a neighbor of Mr. Epstein's that
5 you are aware that Mr. Epstein knows or talks to?

6 A. No, I have no idea.

7 Q. Does Mr. Epstein talk with any of his
8 neighbors that you know of?

9 A. I never saw.

10 Q. Do you ever to talk to [REDACTED] anymore?

11 A. No.

12 Q. When was the last time you saw her?

13 A. I don't remember but probably before the
14 search warrant.

15 Q. Okay. The time when she took the
16 computers out of the house or she came back after
17 that?

18 A. She came back after that.

19 Q. Okay. So, the time when the search
20 warrant was executed, that's the last time you
21 remember her being at the house?

22 A. Yes.

23 MR. EDWARDS: Did you get that? I know we
24 talked over each other a little bit.

25

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 BY MR. EDWARDS:

2 Q. And the appointment book for Mr. Epstein's
3 schedule on any given day, do you know where that
4 was kept?

5 A. No.

6 Q. Did you ever see it?

7 A. No.

8 MR. GOLDBERGER: Form.

9 BY MR. EDWARDS:

10 Q. You don't even know if it existed?

11 A. Right.

12 Q. [REDACTED] [REDACTED] could have had all this
13 information in her head for all you know?

14 A. Could be.

15 Q. How about the message pads that, I don't
16 know if you're aware of this but there were certain
17 messages that were accumulated by the police
18 department in part because of the criminal
19 investigation and they had been turned over as part
20 of the State Attorney's file. I don't really need
21 to get into the basics, but I just wanted to
22 familiarize yourself with what I am talking about.
23 Do you know what I am talking about, message pads?

24 A. Yes.

25 Q. And where was that message pad book kept

1 inside the house?

2 A. There were a few of them, message books. One
3 was in the kitchen when most of the time, you know,
4 people pick up the phone and get the message for Jeffrey
5 Epstein. I had one in my desk in my office.

6 Q. Okay. So, there is one in the kitchen.
7 You had one at your desk, office?

8 A. Right.

9 Q. Or your office desk. And where, where --
10 were there any additional ones?

11 A. I think the one was in the office next to the
12 kitchen.

13 Q. Okay. And who within the house was able
14 to take a message or allowed to take a message for
15 Mr. Epstein, answer the phone and take a message and
16 write it down?

17 A. I was the one. [REDACTED] [REDACTED] was the one.
18 And anybody who was close to the phone I guess.

19 Q. Okay. There were no set rules as to --

20 A. No.

21 Q. Okay. Well, I did learn of some
22 information at some point in time that there was a,
23 I don't want to say a rule book or a manuscript, but
24 there was some level of organization to various
25 roles in the house, yours or somebody else's and

1 what to do in certain situations. Are you familiar
2 with the book I am talking about?

3 A. Yes, it was like a manual.

4 Q. Right.

5 A. How to, I would say, conduct yourself and how
6 to make things around the house, like rules or help with
7 things to make sure that, you know, everything is the
8 right way in the house.

9 Q. What is your, and when you say everything
10 is the right way, by whose standards?

11 MR. GOLDBERGER: Form.

12 THE WITNESS: Whose standards? Jeffrey
13 Epstein.

14 BY MR. EDWARDS:

15 Q. Is he very particular with how things are
16 in the house?

17 A. I mean, he, he is not very strict but he would
18 like, you know, to do certain things in his way I would
19 say.

20 Q. Okay. Would you say that he sticks to a
21 pretty strict schedule?

22 A. No.

23 Q. Okay. Back in 2005 was his schedule more
24 strict in terms of when he woke up, when he had
25 breakfast, what he had for breakfast?

1 A. Same thing I would say. He didn't change.

2 Q. So, the only thing that you can tell me
3 that has changed about his schedule from 2005, the
4 time period before the execution of the search
5 warrant to the time now where he is on house arrest,
6 is that he no longer has these young females over to
7 give him massages?

8 MR. GOLDBERGER: Form.

9 BY MR. EDWARDS:

10 Q. That's the only thing that's changed?

11 MR. GOLDBERGER: Form.

12 THE WITNESS: Yes.

13 BY MR. EDWARDS:

14 Q. This manual on how to conduct yourself, do
15 you have a copy of it?

16 A. No.

17 Q. Okay.

18 A. I used to have but they, it has been changed a
19 little bit. So, at one point [REDACTED] asked me to give it
20 to her. She would like to take a look and, you know,
21 either update it or change something and she never gave
22 me back, so --

23 Q. Okay. So when, when was that, when did
24 that occur when [REDACTED] asked you for the manual so
25 that she could update it or read it or whatever?

1 A. A few months ago. I don't remember exactly
2 date.

3 Q. Who else has a copy of this book?

4 A. I don't know who has one.

5 Q. Well, you do or you did. How about
6 ██████████ ██████████?

7 A. I think she read it. It was kept in my, in my
8 file in my office so it was --

9 Q. So, is it your understanding that there is
10 only one copy of this book?

11 A. Could be another one in the office in New
12 York. I don't know.

13 Q. Okay. Who was the author of that book, do
14 you know?

15 A. I don't know.

16 Q. I mean did Mr. Epstein write it himself?

17 A. I have no idea.

18 Q. Okay.

19 A. I don't know who made those things.

20 Q. Is this a manual that's universal for the
21 organization, and by that I mean, used in the New
22 York house the New Mexico house, Florida house?

23 A. Could be. I'm not sure.

24 Q. Is it your understanding that prior to the
25 execution of the search warrant that in addition to

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 the young females that would come to Mr. Epstein's
2 West Palm house or Palm Beach house, if Mr. Epstein
3 was in New York, similarly young females would come
4 to that house to give him a massage, and similar to
5 that, same thing would happen in New Mexico and
6 elsewhere?

7 A. I don't know.

8 MR. GOLDBERGER: Form.

9 BY MR. EDWARDS:

10 Q. You just don't know.

11 A. No.

12 Q. Not something that you ever discussed with
13 anybody?

14 A. No.

15 Q. All right. Going back to the message
16 pads; there are three locations where these massage
17 pads were situated within the house, right?

18 A. Right.

19 Q. The one in the kitchen was always by the
20 phone?

21 A. Yes, or close to the phone or on the counter
22 somewhere, you know. Usually what I did, I grab any
23 piece of paper, write down the name who calling and
24 write down on this message --

25 Q. Okay.

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EFTA_00006766

EFTA00158351

1 A. -- book.

2 Q. So, sometimes people would call and you
3 would take messages on something other than the
4 message pad that we're familiar with?

5 A. Yeah.

6 Q. All right. But you know what I am talking
7 about when I am referring to this message pad,
8 right?

9 A. Yes, yes.

10 Q. It has a carbon copy sheet?

11 A. Right.

12 Q. And for the most part that's where most of
13 the messages were taken down?

14 A. Yes.

15 Q. So, there is one in the kitchen somewhere
16 near the phone?

17 A. (Witness nods head).

18 Q. Right?

19 THE COURT REPORTER: You have to say yes

20 or --

21 THE WITNESS: Yes.

22 BY MR. EDWARDS:

23 Q. Remember we have her here?

24 A. Yes. Now, I remember.

25 Q. I am understanding you. But there is one

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EFTA_00006767

EFTA00158352

1 in your office by your desk presumably also by a
2 telephone?

3 A. Yes.

4 Q. And there is one in the office near the
5 kitchen?

6 A. Right.

7 Q. Also near a telephone?

8 A. Yes.

9 Q. And you've taken those messages down when
10 some of these young females would call, right?

11 A. Anybody, yes.

12 Q. Yeah. But you know, I realize a lot of
13 people probably call Mr. Epstein.

14 A. Right.

15 Q. For the purposes of this case, I am not
16 all that interested in all the messages he gets. I
17 really want to go focus on the message he gets from
18 someone like [REDACTED] or [REDACTED]. or [REDACTED] or somebody that
19 you recognize as being one of these young females
20 reportedly coming over to give him a massage. Okay?

21 MR. GOLDBERGER: Form.

22 THE WITNESS: Okay.

23 BY MR. EDWARDS:

24 Q. So, are you familiar with certain messages
25 where somebody will call and say this is [REDACTED]., I

1 have a girl for Mr. Epstein?

2 MR. GOLDBERGER: Form.

3 THE WITNESS: No.

4 BY MR. EDWARDS:

5 Q. Okay. You don't remember any messages
6 like that?

7 A. No.

8 Q. Do you remember ever there being a
9 circumstance where somebody called and said I have
10 girls for him or I have a friend that would like to
11 come over and see him?

12 A. No.

13 Q. All right. If you had taken down any of
14 those messages, that may have been alarming to you
15 or told you that, hey, there is something going on
16 here that may not necessarily be perfectly legal?

17 A. I don't know how, you know, how to --

18 Q. That's just not something you ever saw,
19 right?

20 A. Never saw it.

21 Q. Okay. When the police came into the house
22 to execute the search warrant, where were the
23 message pads?

24 A. In the same places as I recall because they,
25 they usually be around the phone. So, I assume they

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EFTA_00006769

EFTA00158354

1 were still on the places next to the phone in each room.

2 Q. You don't remember the message pads being
3 removed from the property prior to the police
4 arriving to execute the search warrant?

5 A. No.

6 Q. So, it's your belief that the police
7 obtained or confiscated the message pads at the time
8 they executed the search warrant?

9 A. Yes.

10 Q. Do you know that to be a fact?

11 A. No.

12 Q. You're just going based on they were
13 always there; we didn't know the police were coming;
14 the police came, and they confiscated a bunch of
15 stuff and if the message pads were there, they
16 confiscated the message pads?

17 A. Yes.

18 Q. Just logical reasoning?

19 A. Right.

20 Q. Did the police ever question you about the
21 messages that were taken down on this message pad
22 from these young females that were at the house to
23 give Mr. Epstein a massage?

24 MR. GOLDBERGER: Form.

25 THE WITNESS: Yes. FBI showed me some

1 copies of my writing those messages, and they
2 ask me if they, if it was me who took those
3 message.

4 BY MR. EDWARDS:

5 Q. And some of the messages you took down?

6 A. Yes.

7 Q. So, some of the times these young females
8 would call and you would be the one to answer the
9 phone?

10 A. Yes.

11 Q. And what do you remember these young
12 females saying to you as their purpose for calling?

13 A. As I recall, a couple of them that they call
14 that they cannot show up at a certain time and they have
15 to do something else. So this was the messages I
16 remember I wrote down on those messages.

17 Q. I don't have great photos here, but I just
18 want to show you this photo. Tell me if you
19 recognize that person.

20 A. No.

21 Q. Okay. Show you this photo and tell me if
22 you recognize that person.

23 A. No.

24 Q. Okay. This is an updated photograph of
25 █. Do you recognize her now that I tell you that

1 that is [REDACTED].?

2 A. No. I, I recognize -- I remember the name,
3 but I don't recognize the face. I will not connect, no,
4 name with the faces.

5 Q. Okay. I mean, it's 2010 now. So this is
6 a photograph that was taken of a person who you
7 would have seen five years ago?

8 A. Right. But still, I don't, I don't recognize
9 her.

10 Q. Okay. Have you talked to Jeffrey Epstein
11 personally about the criminal investigation or any
12 of the things that have been told to you happened
13 inside the bedroom aside from the massage?

14 MR. GOLDBERGER: Form.

15 THE WITNESS: No.

16 BY MR. EDWARDS:

17 Q. Do you ever intend to talk to him about
18 that?

19 A. No.

20 Q. It really, as part of your employment,
21 it's not really of any concern to you what he does
22 up in his bedroom?

23 A. Right.

24 Q. I mean, that's basically your position,
25 right?

1 A. Yes.

2 Q. I mean, if something is going on inside
3 the house that is illegal, that's not something
4 that's really your job duty to investigate,
5 discover, or tell anybody about, right?

6 MR. GOLDBERGER: Form.

7 THE WITNESS: Yes.

8 BY MR. EDWARDS:

9 Q. I mean that statement that I made is true?

10 MR. GOLDBERGER: Form.

11 THE WITNESS: That if I would know that
12 something is going on I would be --

13 BY MR. EDWARDS:

14 Q. Yeah. I mean if you knew that something
15 was going on inside the house that was illegal --

16 A. Right.

17 Q. -- that's not something that really should
18 be of any concern to you, right?

19 MR. GOLDBERGER: Form.

20 THE WITNESS: I would be concerned I would
21 say. If something was going illegal, I would
22 be concerned.

23 BY MR. EDWARDS:

24 Q. Well, I mean you're aware at this point in
25 time that he has pled guilty to several felonies

1 related to what was going on inside the bedroom?

2 MR. GOLDBERGER: Form.

3 THE WITNESS: Right.

4 BY MR. EDWARDS:

5 Q. And that's not something that you're
6 obviously holding against him in any way. You still
7 working for him?

8 A. Yes.

9 Q. Is that something that's factored into
10 your employment with Jeffrey Epstein or the way you
11 think about him or anything else?

12 MR. GOLDBERGER: Form.

13 THE WITNESS: I mean, it's some concern
14 but at the same time, you know, I think it's
15 happened without, I would say, his intended to
16 do on a purpose I would say.

17 BY MR. EDWARDS:

18 Q. What do you mean by that? I don't
19 understand?

20 A. That he -- for example he having the affair
21 with the underage girls, right?

22 Q. Okay.

23 A. So, I assume he didn't know.

24 Q. He didn't know?

25 A. The age of those girls.

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EFTA_00006774

EFTA00158359

1 Q. Okay. You're, you're thinking that or
2 hoping or whatever, believing that Mr. Epstein
3 didn't know the age of the girls that were coming
4 over?

5 A. Yes.

6 MR. GOLDBERGER: Form.

7 BY MR. EDWARDS:

8 Q. Okay. But you're -- so would your opinion
9 change if -- you know, it really doesn't matter what
10 your opinion is. Never mind. Not that I don't care
11 about your opinion, it just doesn't matter a whole
12 lot with respect to the case.

13 In terms of the accumulation of these
14 young females who were coming to the house, you were
15 told that they were coming only for a massage,
16 right?

17 A. Right.

18 Q. And at some point in time you learned that
19 there was a lot more going on than a massage, but
20 you don't think that Mr. Epstein knew that they were
21 underage?

22 MR. GOLDBERGER: Form.

23 THE WITNESS: No. I learn after. I
24 didn't learn anything before; after.

25

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EFTA_00006775

EFTA00158360

1 BY MR. EDWARDS:

2 Q. So, at the very least you know that when
3 you were being told that it was only a massage, you
4 were being misled to some extent, right?

5 MR. GOLDBERGER: Form.

6 THE WITNESS: I, I, I didn't know what to,
7 what was going on. So either misled or not
8 misled, you know, I --

9 BY MR. EDWARDS:

10 Q. Fair enough. Were you aware of these
11 photographs that were inside his closet of
12 apparently, I will just say young females? It was
13 a, I guess a collage of some sort of photographs?

14 A. Yes.

15 Q. All right. Did you see them?

16 A. Yes.

17 Q. Did you know any of the girls in the
18 photographs?

19 A. No.

20 Q. Did you recognize any of the girls in the
21 photographs as being girls that you saw coming over
22 to his house to provide massages?

23 A. No.

24 Q. Do you ever remember seeing photographs of
25 the girls who were coming over to provide massages

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EFTA_00006776

EFTA00158361

1 anywhere?

2 A. No.

3 Q. Did you ever see pornographic images on
4 any of the computers?

5 A. No.

6 Q. Other than your own computer, you didn't
7 look at the other computers, right?

8 A. Right.

9 Q. Okay. Were you ever made aware or told by
10 the police or reading reports or anything else that
11 these young females that would come to the house
12 would oftentimes tell Mr. Epstein that they were 15
13 years old or 16 years old or in high school or
14 things like that?

15 A. No.

16 Q. Okay. Since him pleading guilty and going
17 to jail and things of that nature, have you thought
18 back on what was happening back in 2005 and tried in
19 your own mind to figure out where he met these
20 girls, how he was getting them to his house, who
21 they were working for, things of that nature, or is
22 that something that you just haven't bothered
23 thinking about?

24 A. I don't quite understand your question.

25 Q. Well, I mean, I guess, I guess my question

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EFTA_00006777

EFTA00158362

1 is you know, at the time that it was happening, you
2 thought that it was only massages going on, so it
3 wasn't really alarming you no matter what?

4 A. Right.

5 Q. But at some point in time, then you were
6 told and understood that there were other things
7 going on in the bedroom that ultimately led to a
8 guilty plea on Mr. Epstein's behalf, right?

9 A. Right.

10 MR. GOLDBERGER: Form.

11 BY MR. EDWARDS:

12 Q. So, then after that did you go back and
13 think, you know, think back to the times where you
14 saw these young girls and realize, hey, now I
15 understand why they were there and what they were
16 doing?

17 A. Yes.

18 Q. Okay. And just to take that one step
19 further, did you then try to figure out where did
20 they come from, how did he know them, how was he
21 getting them over to his house, things like that?

22 MR. GOLDBERGER: Form.

23 THE WITNESS: I, I would say don't concern
24 me what, where they came from, what they were
25 doing, just, you know, this is his personal, I

1 would say, life so --

2 MR. EDWARDS: Okay. I don't have any
3 other questions for you right now. I
4 appreciate your time.

5 I think that Mr. Mermelstein probably will
6 have some questions for you.

7 MR. MERMELSTEIN: I do have some
8 questions. Why don't we take a five minute
9 break.

10 MR. GOLDBERGER: Yeah. Five minutes.

11 (A brief recess was held.)

12 CROSS (JANUSZ BANASIAK)

13 BY MR. MERMELSTEIN:

14 Q. Did Mr. Epstein provide you with a vehicle
15 for your use?

16 A. I mean, I used the vehicle he owns for my
17 purpose sometimes.

18 Q. How many vehicles does he own?

19 A. Right now?

20 Q. Let's go back to when you started in 2005.

21 A. Let me see. Go back. There were two
22 Mercedes S500, one Cadillac Escalade and one Chevrolet
23 Suburban.

24 Q. What was the first car? I'm sorry.

25 A. Two Mercedes.

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EFTA_00006779

EFTA00158364

1 Q. Two Mercedes?

2 A. Yeah, S500.

3 Q. Was there a car that you typically used or
4 you drove?

5 A. Yes. Most of the time I used the Chevrolet
6 suburban.

7 Q. And would you run errands for the
8 household in this suburban?

9 A. Yes.

10 Q. And what kind of errands would you
11 perform?

12 A. I was buying groceries, flowers for the house,
13 and I would say anything to pick up whatever was
14 necessary in the house.

15 Q. Was there a person who instructed you as
16 to what to do on these errands?

17 A. Yes. Either [REDACTED] or Ghislaine Maxwell, they
18 give me some point, what kinds of grocery, what kind of
19 food Jeffrey Epstein preferred, what kind of flowers he
20 likes. So, I was following instruction from them for a
21 few weeks until I got it by myself.

22 Q. Would you say [REDACTED] was a supervisor of
23 you as well as Ms. Maxwell?

24 A. Yes, yes.

25 Q. Was there an occasion when you rented a

1 car on behalf of Mr. Epstein?

2 A. Yes.

3 Q. Tell me how that came about.

4 A. I rent the car for one of the girl. I don't
5 remember name right now. I think for a couple of months
6 or more.

7 Q. And who asked you to rent the car?

8 A. [REDACTED].

9 Q. And what did she tell you?

10 A. She told me to rent a car for, for this
11 person.

12 Q. And who did she tell you this person was?

13 A. She mention name, [REDACTED].

14 Q. And did she explain why you were renting a
15 car for [REDACTED]?

16 A. No.

17 Q. Did you ask her why am I renting this car?

18 A. No.

19 Q. And do you remember the rental car agency
20 you went to, to rent the car?

21 A. Dollar. I'm not sure.

22 Q. You think it was Dollar?

23 A. Just one of the rental in the airport, Palm
24 Beach airport.

25 Q. All right.

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EFTA_00006781

EFTA00158366

1 A. Either Dollar or Rent-a-Car, or I don't
2 remember the company.

3 Q. So, would you take a cab to the airport or
4 did someone drive you there to pick up the car?

5 A. I don't remember how this was arranged. I
6 think [REDACTED] dropped me at the airport.

7 Q. And you rented the car in your own name --

8 A. Yes.

9 Q. -- correct? And you say it was -- were
10 you instructed to rent it in your own name?

11 A. Yes.

12 Q. And did [REDACTED] tell you to do that?

13 A. Yes.

14 Q. Did you have a problem with putting --

15 A. No.

16 Q. -- the car on -- it was on your own
17 credit, correct?

18 A. Yes.

19 Q. There was no company card or organization
20 card, credit card that you had, correct?

21 Mr. Epstein didn't give you a credit card?

22 A. Yes. He gave me a credit card.

23 Q. Oh he did. What kind of credit card was
24 it?

25 A. I think Master Card or Visa. I don't

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EFTA_00006782

EFTA00158367

1 remember.

2 Q. And was the Master Card or Visa in his
3 name?

4 A. My name.

5 Q. But he paid the bills?

6 A. Yes.

7 Q. And was it understood that this credit
8 card was to be used for household expenses?

9 A. Right.

10 Q. And is that how you paid for the car?

11 A. Yes.

12 Q. You don't remember if it was a Master Card
13 or a Visa?

14 A. I think Visa.

15 Q. So, you went and you believe that [REDACTED]
16 brought you to the Palm Beach airport. You rented
17 the car and then drove it back to the house?

18 A. Yes.

19 Q. The house in Palm Beach, correct?

20 A. Correct.

21 Q. And did [REDACTED] then come and pick
22 up the car?

23 A. Yes.

24 Q. And how did she get to the house on that
25 occasion?

1 A. I don't remember how she got to the house.
2 Probably somebody drove her, either a friend or somebody
3 she knew.

4 Q. And then did you hand her the keys to the
5 car?

6 A. Yes.

7 Q. Did you tell her how long she had the car
8 for?

9 A. Yes. Because there was a rental agreement I
10 think for 30 days or something else.

11 Q. Did [REDACTED] come to the house to
12 give Epstein a massage?

13 A. Yes.

14 Q. Okay. How many occasions do you recall
15 her coming to the house to give Epstein a massage?

16 A. I don't remember.

17 Q. Many occasions?

18 A. I don't know. I cannot tell right now. It's,
19 it's -- I didn't count exactly how many times she was in
20 house.

21 Q. She was someone who would come more than
22 once, correct?

23 A. Correct.

24 Q. You saw her -- well, strike that.

25 There were girls who came for massages, I

1 take it, who would be there once and you wouldn't
2 see them again; is that fair to say?

3 A. Yes.

4 Q. And there are girls who came for massages
5 who you would see come repeatedly over a period of
6 time?

7 A. Right.

8 Q. Okay. And [REDACTED] was one of the
9 girls that came repeatedly over a period of time?

10 A. Yes.

11 Q. Did you observe Mr. Epstein meeting or
12 speaking with [REDACTED]?

13 A. No.

14 Q. When she came she would come into the
15 kitchen like the other girls who would give
16 massages?

17 A. Yes.

18 Q. And then [REDACTED] or someone would, is it
19 your understanding take her upstairs?

20 A. Yes.

21 Q. On the occasions she came to pick up her
22 car, did she to your understanding give Epstein a
23 massage on that occasion?

24 A. I don't remember this day if she was there,
25 but I know that when she arrive I give her the keys.

1 But if she left right away or she went to give massage,
2 I don't remember this day.

3 Q. Okay. Do you know [REDACTED]'s last
4 name?

5 A. No.

6 Q. If I told you her name was [REDACTED],
7 would that ring a bell?

8 A. No.

9 Q. Do you recall instances where [REDACTED]
10 [REDACTED] called the house?

11 A. No.

12 Q. Do you recall other girls that [REDACTED]
13 [REDACTED] came with on any occasions?

14 A. I don't remember exactly, you know, what, what
15 how many times she was there.

16 Q. More than ten?

17 MR. GOLDBERGER: Form.

18 THE WITNESS: I cannot tell you the truth.

19 BY MR. MERMELSTEIN:

20 Q. Let me show you a photograph and ask you
21 if you recognize that girl.

22 A. No.

23 Q. Is that [REDACTED]?

24 A. I am not sure. I know she [REDACTED],
25 but I don't recognize her face.

1 Q. Let me show you some other photos. Do you
2 recognize this girl?

3 MR. GOLDBERGER: You better start marking
4 these?

5 MR. MERMELSTEIN: What?

6 MR. GOLDBERGER: We're going to have to
7 start marking them. How are we going to know
8 what you're talking about?

9 (A discussion was held off the record.).

10 MR. GOLDBERGER: All right. So, I'm
11 marking the first one as your Exhibit No. 1,
12 the [REDACTED].

13 MR. MERMELSTEIN: We'll mark it as Exhibit
14 1.

15 MR. GOLDBERGER: The second one as Exhibit
16 2.

17 MR. EDWARDS: His answer is the same for
18 both.

19 MR. GOLDBERGER: You can do them as a
20 composite one if you like.

21 MR. MERMELSTEIN: Why don't we do that.

22 MR. GOLDBERGER: You're going to need to
23 make a photocopy of that so we have something.

24 MR. MERMELSTEIN: These are photocopies.
25 Can you indicate before I show him the

1 second one that that's Exhibit 2, and that this
2 is Exhibit 1. Why don't we do that. Is that
3 all right? That way we'll be able to tell,
4 distinguish them. Can you hand this to the
5 court reporter so she could mark them.

6 (Plaintiffs' Exhibit No's 1 and 2 were
7 marked for identification.)

8 BY MR. MERMELSTEIN:

9 Q. Let me show you another photo. Do you
10 recognize this girl?

11 A. No.

12 Q. Do you recall a girl by the name of [REDACTED]
13 [REDACTED]?

14 A. No.

15 MR. GOLDBERGER: Excuse me. Let's go off
16 the record.

17 (A discussion was held off the record.)

18 (Plaintiffs' Exhibit No. 3 was marked for
19 identification.)

20 BY MR. MERMELSTEIN:

21 Q. Let me show you Exhibit 3, and ask you if
22 you can identify this girl?

23 A. No.

24 MR. MERMELSTEIN: Let's mark that.
25

1 (Plaintiffs' Exhibit No. 4 was marked for
2 identification.)

3 BY MR. MERMELSTEIN:

4 Q. And I will show you Exhibit 4 and ask you
5 if you recognize this girl.

6 A. No.

7 (Plaintiffs' Exhibit No. 5 was marked for
8 identification.)

9 BY MR. MERMELSTEIN:

10 Q. Do you remember a girl by the name of [REDACTED]
11 [REDACTED] who would come to house to give Epstein
12 massages?

13 A. Yes, I remember name [REDACTED].

14 Q. You remember [REDACTED]. What do you
15 remember about [REDACTED]?

16 MR. GOLDBERGER: Form.

17 THE WITNESS: Just the name.

18 BY MR. MERMELSTEIN:

19 Q. Do you remember a girl named [REDACTED]
20 [REDACTED] who would come to the house and give Epstein
21 massages?

22 MR. GOLDBERGER: Form.

23 THE WITNESS: Yes.

24 BY MR. MERMELSTEIN:

25 Q. And she was a girl who would, who came

1 more than once like [REDACTED] did?

2 A. Yes.

3 Q. Do you recall approximately how many times
4 [REDACTED] would come to give Epstein a massage?

5 A. No.

6 Q. You mentioned in response to Mr. Edwards'
7 questioning the manual to the house. Was there
8 policies in the manual regarding contacting police
9 and in the event there was an indication to do so?

10 A. Yeah. It was I think on the last page there
11 was an emergency contact information, address of
12 hospital and 911.

13 Q. Were you ever given instruction that you
14 should not call the police?

15 A. No.

16 Q. That was never anything that was told to
17 you?

18 A. No, no.

19 Q. You have been employed by Mr. Epstein
20 since February, 2005, correct?

21 A. Correct.

22 Q. And how do you receive your income, do you
23 receive it by direct deposit into your account?

24 A. Yes.

25 Q. Do you remember receiving a paycheck by

1 hand?

2 A. By mail.

3 Q. By mail. Okay. By mail to where? Oh,
4 I'm sorry. The mail, does it come from New York?

5 A. Yes.

6 Q. And what is the name of the account on the
7 check?

8 A. HBRK Associates.

9 Q. HBRK Associates. And what is your
10 understanding of what that stands for?

11 A. I don't know. Just, I guess, initials.

12 Q. Is it your understanding that HBRK
13 Associates was your employer or is your employer?

14 A. Yes.

15 Q. But you have been testifying today that
16 your employer was Mr. Epstein. What is your
17 understanding of the relationship between HBRK
18 Associates and Mr. Epstein?

19 A. I think that's his company.

20 Q. It's his company?

21 A. Right.

22 Q. And to your understanding are the other
23 people in the organization employed by HBRK
24 Associates?

25 MR. GOLDBERGER: Form.

1 THE WITNESS: Yes.

2 BY MR. MERMELSTEIN:

3 Q. And you have been employed by HBRK
4 Associates since you started in October, since you
5 started in February 2005?

6 A. I don't know to tell you the truth if this was
7 the organization that was, hire me.

8 Q. That was the organization that hired you?

9 A. No, I'm not sure.

10 Q. Okay. You're not sure if that was the
11 organization?

12 A. Right.

13 Q. Was there a different organization at the
14 time you were hired?

15 A. I don't remember. Maybe there was also, I
16 remember there was a household account on the face of my
17 paycheck.

18 Q. Jeffrey Epstein household account?

19 A. Right.

20 Q. And you think at some point it may have
21 switched to HBRK Associates?

22 A. Right.

23 Q. But you don't remember when that was?

24 A. No.

25 Q. Was it shortly after you started?

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EFTA_00006792

EFTA00158377

1 MR. GOLDBERGER: Form.

2 THE WITNESS: Could be.

3 BY MR. MERMELSTEIN:

4 Q. Any idea?

5 A. After two years maybe, after three years. I
6 don't remember.

7 Q. After two years or so. So, it would have
8 been 2007, 2008?

9 A. Could be.

10 Q. Do you ever have conversations with
11 Mr. Epstein about things going on in your lives
12 and --

13 A. No.

14 Q. Friendly conversation?

15 A. No, we don't talk.

16 Q. No. Do you, do you have days off?

17 A. Yes.

18 Q. Where do you go?

19 MR. GOLDBERGER: Form.

20 THE WITNESS: Where do I go?

21 BY MR. MERMELSTEIN:

22 Q. Where do you go? Do you have someplace
23 else that you live?

24 A. No, I live on the property.

25 Q. So, even on your days off, you're still on

1 the property?

2 A. Sometimes I go, sometime I take some vacation.

3 I go away for a time of my vacation.

4 Q. But there are days when you're staying on
5 the property but you're not working?

6 A. Yes.

7 Q. Is that fair to say?

8 A. Yes.

9 Q. So, no one asks you to do anything during
10 that time?

11 A. No. My day off, they don't bother me. They
12 know I am not working.

13 Q. Okay. Now, you said that when you were
14 hired, your salary was \$58,000?

15 A. Yes.

16 Q. What is it today?

17 A. Sixty-two.

18 Q. Sixty-two?

19 A. Yes.

20 Q. When is the last time you got a raise?

21 A. I would say two years ago.

22 Q. And do you know why you haven't gotten a
23 raise in two years?

24 A. Economic condition. Everybody suffer.

25 Q. Is that something you've discussed with

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EFTA_00006794

EFTA00158379

1 Mr. Epstein?

2 A. No.

3 Q. You just assumed that it's economics?

4 A. No. I think somebody from, from the, from the
5 office told me that there would be no increase --

6 Q. Someone from --

7 A. -- or bonuses for last year because of the
8 situation, stock market went down.

9 Q. Someone from the office in New York?

10 A. Yes.

11 Q. You don't remember who?

12 A. I think Rich, Rich Kahn.

13 Q. And do you get bonuses too?

14 A. Yes.

15 Q. And when was the last time you got a
16 bonus?

17 A. Like two years ago.

18 Q. And how much was that?

19 A. I don't remember. The last one was \$10,000.

20 Q. Okay. So, your income for that year would
21 have been 72,000 if I am understanding?

22 A. Yes.

23 Q. Which would have been \$62,000 salary and
24 \$10,000 bonus, correct.

25 A. Right.

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EFTA_00006795

EFTA00158380

1 Q. Does [REDACTED] stay at the house?

2 A. Yes.

3 Q. And does she sleep in the same bedroom as
4 Mr. Epstein?

5 A. Yes.

6 Q. When Mr. Epstein travels, who does he
7 travel with? When he comes from New York or some
8 other location, who does he come with?

9 A. [REDACTED], [REDACTED].

10 Q. Anyone else?

11 A. Igor.

12 Q. Who is Igor?

13 A. He is personal trainer.

14 Q. Does he have any other jobs?

15 A. Pardon me?

16 Q. Does he have any other jobs or functions?

17 A. No.

18 Q. He is the personal trainer?

19 A. Yes.

20 Q. For exercise?

21 A. Yes.

22 Q. Anyone else travel with him?

23 A. I don't know.

24 Q. Does he have a guest who travels with him?

25 A. I really don't know. Sometimes he brings

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 guests, but I, I don't recall, no, which day on which
2 occasion.

3 Q. Were there occasions when he brought young
4 girls as guests?

5 A. No. I don't remember bringing from his
6 airplane any girls to the house.

7 Q. The only young girls you remember coming
8 to the house were, came to the kitchen door for
9 massages?

10 A. Right.

11 Q. Do you recall instances where two girls
12 would come to the house?

13 A. Yes.

14 Q. And what would happen on occasions when
15 two girls came?

16 MR. GOLDBERGER: Form.

17 THE WITNESS: Yeah. I remember one was
18 waiting in the kitchen for her one of her
19 friends, and she told me she's waiting for her?
20 Either she gave her a ride to the house or they
21 have something to do together. I don't know.

22 BY MR. MERMELSTEIN:

23 Q. Do you remember who that was?

24 A. No.

25 MR. GOLDBERGER: We're going to take a

1 lunch break at 1:00. We'll be going three
2 hours now.

3 MR. EDWARDS: I understand. Are we close?

4 MR. MERMELSTEIN: Yes, we're close.

5 MR. GOLDBERGER: If he's almost done and
6 you have a little bit.

7 MR. EDWARDS: I will. I will. So, let's
8 just take a lunch break whenever you're ready.
9 I don't care. I don't think there is any way
10 to avoid a lunch break is what I am saying. I
11 was hoping we could, but that's all right.

12 MR. GOLDBERGER: Do you want to finish
13 yours, is that what you want to do?

14 MR. MERMELSTEIN: It doesn't matter.

15 MR. GOLDBERGER: Okay. We'll just go now.
16 Do you want to do 20 minutes?

17 (A brief recess was held.)

18 BY MR. MERMELSTEIN:

19 Q. So, you testified regarding this occasion
20 where two girls arrived at the house and one of the
21 girls gave a massage, correct?

22 A. Yes.

23 Q. And one of the girls waited for the girl
24 who gave the massage, correct?

25 A. Yes.

1 Q. And the girl waited in the kitchen?

2 A. Yes.

3 Q. Do you remember other occasions where that
4 happened?

5 A. No.

6 Q. Is one occasion you remember that
7 happening?

8 A. Yes.

9 Q. Did you know these girls received money in
10 exchange for giving messages?

11 A. Yes, yes.

12 Q. Were you responsible for paying them?

13 A. Yeah. I pay some of them.

14 Q. Okay. And how did you pay them?

15 A. I either -- I get a phone call from [REDACTED] or
16 [REDACTED] and they mention name that such a girl show up
17 at the house and I should give them money.

18 Q. Okay. So, I think you testified before
19 that you would get a, you would get a call or you
20 would be advised that there is a girl coming to give
21 a message, correct?

22 A. Right.

23 Q. And that you should let her in when she
24 comes, right?

25 A. Yes.

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EFTA_00006799

EFTA00158384

1 Q. And in that same phone call were you told
2 that you're supposed to pay the girl and how much
3 you're supposed to pay her?

4 A. No, another phone call.

5 Q. A different phone call?

6 A. Different phone call.

7 Q. While the girl was there?

8 A. I don't recall if I pay somebody when she
9 comes to the massage. I recall when I got the phone
10 call that I have to pay those girls who show up at the
11 house and I should give them money.

12 Q. I'm sorry. I didn't --

13 A. So, otherwise, what I try to say is that I did
14 pay, you know, after the massage. I give to her money.
15 Most of the time what I pay nobody was in the house.
16 For example, Mr. Epstein was away and I got the phone
17 call from either [REDACTED] or [REDACTED] and they would show up
18 and I would give them money.

19 Q. Okay. When Mr. Epstein was away?

20 A. Yes.

21 Q. Okay. So, you mean when he was not in the
22 house?

23 A. Right.

24 Q. So, what were the occasions where girls
25 would get paid when Mr. Epstein was not in the

1 house? I am trying to understand.

2 A. Just give them the money.

3 Q. Oh, just give them money?

4 A. Yes.

5 Q. Was this money for massages?

6 A. Yes.

7 Q. So, but this wasn't just after they

8 completed the massage?

9 A. Yes.

10 Q. It was or it wasn't? I am not clear.

11 A. After, yeah.

12 Q. After they gave the massage.

13 A. Right.

14 Q. What I am unclear is that you said

15 Mr. Epstein wasn't in the house.

16 A. Yeah. On a few occasion, you know,
17 Mr. Epstein was in the house and I got the phone call
18 that this girl show up and I should pay her money.

19 Q. Okay.

20 A. So, I assume either she didn't get paid before
21 or you know what I mean.

22 Q. I see. This wasn't where the girl had
23 come to the house, given the massage, and then left.

24 This is she came separately --

25 A. Right.

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EFTA_00006801

EFTA00158386

1 Q. -- to receive money for giving a massage
2 that she had already given at some prior time?

3 A. Yes, yes.

4 Q. Okay. And that's the occasion where you
5 paid her?

6 A. Yes.

7 Q. And you were told that this was payment
8 for the girl who had given Epstein a massage?

9 A. It wasn't mention massage. It wasn't
10 mentioned just for a massage, but just give her money.

11 Q. It was mentioned for a massage or it was?

12 A. I don't, I don't remember.

13 Q. But you don't --

14 A. I don't remember massage, but I was told to
15 give her money.

16 Q. Do you remember who it was that you gave
17 money to?

18 A. I don't recall the name.

19 Q. Okay. Do you recall giving money to [REDACTED]
20 [REDACTED]

21 A. No. Could be but I don't remember. I don't
22 remember. I cannot recall which girl I pay.

23 Q. How often was it that a girl would come
24 back to the house to get money?

25 MR. GOLDBERGER: Form.

1 THE WITNESS: I would say like maybe six,
2 eight times.

3 BY MR. MERMELSTEIN:

4 Q. Were there different girls on each
5 occasion or was it --

6 A. Different girls.

7 Q. Different girls on each occasion. And
8 these were all girls who at some prior time had
9 given Epstein a massage?

10 A. Yes.

11 Q. And then they came back at a later time to
12 get money?

13 A. Correct.

14 Q. And for that purpose only?

15 A. Correct.

16 Q. And Mr. Epstein wasn't in the house at
17 that time?

18 A. Right.

19 Q. Was it your understanding that when
20 Mr. Epstein was in the house and the girl had come
21 to give him a massage that he paid her at that time?

22 A. I don't know. I haven't seen, you know.

23 Q. How much did you -- on each of these eight
24 or so occasions that you gave a girl money who came
25 to the house, how much did give her?

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EFTA_00006803

EFTA00158388

1 A. From two to 400, from 200 to 400.

2 Q. 200 to \$400?

3 A. Right.

4 Q. Did you have any understanding as to what
5 the reason was for the difference in the amounts?

6 A. No.

7 Q. Did you have any understanding of the --
8 strike that. Is it fair to say these girls who
9 would come to the house to give Epstein massages
10 were not professional masseuses?

11 MR. GOLDBERGER: Form.

12 THE WITNESS: I don't know.

13 BY MR. MERMELSTEIN:

14 Q. Did it appear to you that they were not
15 professional?

16 A. I cannot tell.

17 MR. GOLDBERGER: Form.

18 THE WITNESS: I didn't know their
19 backgrounds, whether they were trained or not
20 trained.

21 BY MR. MERMELSTEIN:

22 Q. I am sorry, they what?

23 MR. GOLDBERGER: Trained or not trained?

24 THE WITNESS: I didn't know if they were
25 trained or not trained.

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EFTA_00006804

EFTA00158389

1 MR. MERMELSTEIN: You didn't know if they
2 were trained or not trained?

3 THE WITNESS: Right.

4 BY MR. MERMELSTEIN:

5 Q. Did you know if they worked for a
6 particular company?

7 A. No.

8 Q. You didn't, you didn't have reason to
9 believe that there was any particular company that
10 was sending masseuses to Epstein's house?

11 A. No.

12 Q. So, as far as you know they were all
13 independent?

14 A. Yes.

15 Q. And you have no idea why all these
16 independent girls or how it was that they were
17 coming to give Epstein massages?

18 A. Yes.

19 Q. Now, you mention that [REDACTED] had removed
20 those three computers from the house. And you also
21 testified that you had your own computer in your
22 office which was in the other, in the adjacent
23 living quarters, correct?

24 A. Yes, correct.

25 Q. In the -- in the main house were there any

1 computers left after these three were taken?

2 A. Yeah. I think one was left, the small one.

3 Q. Was that the laptop?

4 A. No, small computer.

5 Q. Why do you call it a small computer?

6 A. I would say a 15-inch screen monitor. One was
7 left.

8 Q. Where was that computer located?

9 A. It was in his office next to the kitchen.

10 Q. And do you know if that computer was
11 linked to the others?

12 A. I don't know.

13 Q. And was that computer there when the
14 police came to execute their search warrant?

15 A. Yes.

16 Q. And they took that computer?

17 A. Yes.

18 Q. That was the only computer that they took
19 to your knowledge?

20 A. Yes.

21 Q. You mentioned Bella Klen and Richard Kahn,
22 correct?

23 A. Correct.

24 Q. They were both accountants in New York to
25 your understanding?

1 A. Yes.

2 Q. And they are both employed by HBRK
3 Associates; is that your understanding?

4 A. Yes, yes.

5 Q. And is one supervisor of the other? Is
6 one higher up than the other?

7 A. I think Rich Kahn is, I would say has the
8 higher position.

9 Q. Have you met Mr. Kahn?

10 A. Yes.

11 Q. Has he been to Palm Beach?

12 A. Yes.

13 Q. What was the occasion for him to come to
14 Palm Beach?

15 A. That they met with Jeffrey Epstein's office.

16 Q. Does Mr. Kahn handle business matters
17 outside the household to your knowledge?

18 A. I don't think so.

19 Q. You think he just handles household
20 matters?

21 A. No. He handle, I would say, investment.

22 Q. Which is, which is Mr. Epstein's, to your
23 understanding, prime business, correct?

24 A. Right.

25 Q. And that's what Mr. Kahn handles?

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EFTA_00006807

EFTA00158392

1 A. Correct.

2 Q. Would you say that Mr. Kahn is a key
3 employee like a right-hand man of Mr. Epstein?

4 MR. GOLDBERGER: Form.

5 THE WITNESS: Yes.

6 BY MR. MERMELSTEIN:

7 Q. Is he still employed with Mr. Epstein?

8 A. Yes.

9 Q. You mentioned that when you were
10 questioned by the FBI, that was the first time that
11 you learned that there were surveillance cameras in
12 the house, correct?

13 A. Correct.

14 Q. Anything else from the questioning by the
15 FBI that you learned for the first time?

16 MR. GOLDBERGER: Form.

17 THE WITNESS: No.

18 BY MR. MERMELSTEIN:

19 Q. That was it? That was the only thing,
20 piece of information that they gave to you
21 essentially during the course of that questioning?

22 MR. GOLDBERGER: Form.

23 THE WITNESS: Yes.

24 BY MR. MERMELSTEIN:

25 Q. Is there anything that you told them that

1 they indicated to you that, gee, that's the first
2 time we heard that?

3 MR. GOLDBERGER: Form.

4 THE WITNESS: I don't understand.

5 BY MR. MERMELSTEIN:

6 Q. Is there any new information to your
7 knowledge that you gave to them that they didn't
8 previously have?

9 A. No.

10 MR. GOLDBERGER: Form.

11 THE WITNESS: No.

12 BY MR. MERMELSTEIN:

13 Q. No. Anything you told them they already
14 new, is that your understanding?

15 MR. GOLDBERGER: Form.

16 THE WITNESS: Yes.

17 BY MR. MERMELSTEIN:

18 Q. You testified that there were a few
19 occasions where you picked up the massage room
20 upstairs. You put the massage table away, correct?

21 A. Correct.

22 Q. And on any of those occasions did you
23 observe a vibrator?

24 A. No.

25 Q. Did you observe any massage tools?

1 MR. GOLDBERGER: Form.

2 THE WITNESS: I don't remember, no.

3 MR. MERMELSTEIN: You just --

4 THE WITNESS: I don't remember.

5 BY MR. MERMELSTEIN:

6 Q. Okay. You don't remember?

7 A. If I saw, I saw, I saw in -- I think one of
8 the drawers that I recall massage lotion. They call it
9 a personal massage.

10 Q. And could you describe that?

11 A. It was for massage, muscle massage with rubber
12 head, vibrate when you press the button. You can buy
13 them in Brookstone's. I saw them.

14 Q. Anything -- so you opened the drawer to
15 put something away and you saw that?

16 A. Yes.

17 Q. Anything else you see at that time?

18 A. No.

19 MR. MERMELSTEIN: All right. I am going
20 to defer to Mr. Edwards.

21 REDIRECT (JANUSZ BANASIAK)

22 BY MR. EDWARDS:

23 Q. Just so that I understand what you were
24 telling Mr. Mermelstein about paying the girls, you
25 were saying that sometimes you would pay them and

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EFTA_00006810

EFTA00158395

1 Mr. Epstein was out of town, right?

2 A. Right.

3 Q. And this would either be -- well, it would
4 be a situation where you were told that if somebody
5 comes over, some certain female comes over, then
6 just pay her, right?

7 A. Right.

8 Q. Would it be initiated by you in that, you
9 know, the person would come to the door, you're not
10 expecting them, you call [REDACTED] and she says just pay
11 them?

12 A. No.

13 Q. You were always forewarned, hey, this
14 person is going to come over, pay them?

15 A. Right, right.

16 Q. Do you know whether it was they had a
17 scheduled appointment but Mr. Epstein wasn't in town
18 and he was saying just pay them anyway, or she had
19 performed a massage at some point in time, not been
20 paid and was back to receive her money, do you know
21 which one?

22 A. No.

23 Q. Okay. So, it could have been either
24 situation --

25 A. Yes.

1 Q. -- to the best of your knowledge? And
2 when you would pay these girls or [REDACTED] would pay
3 them or whoever would pay them, would it always be
4 in cash?

5 A. Yeah. I pay them all with cash.

6 Q. You didn't write checks to them?

7 A. No, just cash.

8 Q. Ever wire any money to any of them?

9 A. No.

10 Q. Western Union or anything like that?

11 A. No.

12 Q. Did you ever withdraw money from the ATM,
13 was that one of your responsibilities that would
14 later be used to pay the girls?

15 A. No.

16 Q. Do you know who withdrew the money?

17 A. No.

18 Q. Do you know whose responsibility it was to
19 go to the ATM for Mr. Epstein to have cash on hand?

20 A. Yeah, part was my responsibility. I mean, not
21 to withdraw from the ATM. I went to the bank so we have
22 cash for spending, household cash.

23 Q. All right.

24 A. So, I always kept cash, you know, for myself,
25 for household, for grocery. So, whatever I need the

1 money, I go to the bank to withdraw some money and I
2 kept it with me.

3 Q. Okay. And you just give the receipt to
4 somebody so they know how much you took out?

5 A. Right.

6 Q. And typically what would you take out of
7 the bank in terms of cash to keep on hand?

8 A. About \$2,000.

9 Q. All right. So, you would go to the bank.
10 Is \$2,000 an amount that was told to you as an
11 appropriate amount to take out?

12 A. I mean, it was my decision how much money I
13 need. But most of the time I withdraw \$2,000 and
14 whatever I spend, I go and draw another one.

15 Q. I understand that at some point in time
16 you realize that that was a decision that you could
17 make. But let's say the first time you go to the
18 bank, you don't just make the decision to take out
19 \$2,000, do you? I mean, somebody gives you some
20 guidance?

21 A. No.

22 Q. Okay. They give you authority, they say
23 go to the bank and get out some money and you decide
24 on your own that \$2,000 is an appropriate amount?

25 A. Yes.

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EFTA_00006813

EFTA00158398

1 Q. All right. What bank do you go to?

2 A. Colonial Bank on Worth Avenue.

3 Q. All right. And what account are you
4 withdrawing the money from or are there multiple
5 accounts?

6 A. One account, Jeffrey Epstein household
7 account.

8 Q. And what is the name on the account?

9 A. Jeffrey Epstein household account.

10 Q. Okay. That's the name of the account?

11 A. Yes.

12 Q. Is that the only account that you ever
13 withdrew money from?

14 A. Yes.

15 Q. All right. And then when you -- is that
16 the cash that you would use or is that also cash
17 that you would distribute to, let's say, [REDACTED]
18 [REDACTED] or Jeffrey Epstein?

19 A. No. This is only for my expenditure.

20 Q. That's not then the money that was used to
21 pay these young females?

22 A. Yes.

23 Q. It is?

24 A. Yes.

25 Q. So, would you always be the one paying

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EFTA_00006814

EFTA00158399

1 them?

2 A. On a few occasions, yes, but not, not, not
3 always.

4 Q. Okay. Oftentimes [REDACTED] was paying them or
5 somebody else in the house?

6 A. I assume.

7 Q. And the money that [REDACTED] was using to pay
8 them with, do you know where she got it or what
9 account she withdraw it from?

10 A. No.

11 Q. All right. If Jeffrey Epstein was paying
12 them personally, you don't know what account he
13 withdrew it from?

14 A. I don't know.

15 Q. I thought I overheard you, I may be wrong
16 but I thought when we were walking out to lunch I
17 overheard you say you don't need to get your card
18 stamped because you have a card or something?

19 A. Yes.

20 Q. What is that?

21 A. This is parking access to garage downstairs.

22 Q. Okay. Have you been to this building
23 before?

24 A. Yes, very often.

25 Q. Very often. And it's -- where do you

1 park? I mean I know where I parked, but I don't
2 know, where do you park when you get -- do you have
3 an assigned space or something?

4 A. No, just whatever I find a space, I park.

5 Q. What floor do you park on?

6 A. Right now on first level.

7 Q. On the first level. All right. And what
8 does the card give you access to?

9 A. This is a card that we get for the office.

10 Q. Just to get in and out of the garage?

11 A. Right.

12 Q. Or does it also give you access to Jeffrey
13 Epstein's office, that being the Florida Science
14 Foundation?

15 A. For the garage.

16 Q. For the garage.

17 A. There are keys for office.

18 Q. Okay. And when you come over from the
19 garage to the building, is that on the second floor
20 or first floor or how do you get in?

21 A. First floor.

22 Q. And that's always the routine that you
23 take?

24 A. Yes.

25 Q. All right.

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EFTA_00006816

EFTA00158401

1 A. Sometimes I park in front of the building, but
2 if there is no space I go to the garage.

3 Q. But there is no set parking spaces
4 assigned to Jeffrey Epstein?

5 A. No.

6 Q. Or to you or to anybody else?

7 A. No, no.

8 Q. All right. In the police report, you
9 know, there are several females that talk about
10 being in the bedroom with Mr. Epstein and [REDACTED] also
11 at times being in the bedroom, and Mr. Epstein
12 requesting that [REDACTED] use strap-on penises or
13 vibrators or dildos or something on these young
14 girls while Epstein stands by and masturbates and it
15 goes into detail. But my question is, have you ever
16 seen any of these strap-on or vibrator devices in
17 the house?

18 MR. GOLDBERGER: Form.

19 THE WITNESS: No.

20 BY MR. EDWARDS:

21 Q. Okay. Were you aware that there were
22 times where these young females we've been
23 discussing as people that you were led to believe
24 that were providing massages were up in the bedroom
25 with Mr. Epstein and [REDACTED]?

1 A. No.

2 MR. GOLDBERGER: Form.

3 BY MR. EDWARDS:

4 Q. And have you known, just based on your
5 observations, [REDACTED] to have girlfriends? And by
6 girlfriends I mean girlfriends that she would be
7 intimate with in addition to being the girlfriend of
8 Jeffrey Epstein?

9 A. No.

10 Q. Do you know somebody by the name of Jean
11 Luc Brunel?

12 A. Yes.

13 Q. How do you know him?

14 A. He was in the house like, I guess, a few
15 times.

16 Q. When?

17 A. When?

18 Q. When was the last time you saw him there?

19 A. A week ago.

20 Q. Today is, what, February 16th, and this is
21 a Tuesday. So, when we are saying a week ago, are
22 you saying it was last Tuesday, Wednesday, Thursday,
23 Friday, do you remember?

24 A. I don't remember the date but he stay maybe
25 three days, I think, in the house.

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EFTA_00006818

EFTA00158403

1 Q. So, if he arrived on Tuesday, he stayed
2 through Thursday or Friday and --

3 A. Yes.

4 Q. Do you know what the occasion was for him
5 to come in town?

6 A. No.

7 Q. Where did he stay in the house last week?

8 A. One of the bedrooms upstairs.

9 Q. And was Mr. Epstein also staying in the
10 house?

11 A. Yes.

12 Q. All right. Did Mr. Brunel bring any
13 company with him?

14 A. No.

15 Q. It was him alone?

16 A. Yes.

17 Q. How did he get to the house?

18 A. I think he has been picked up by Igor at this
19 point.

20 Q. And where did he -- I assume he flew in
21 from somewhere?

22 A. Yes.

23 Q. Picked up from the airport, safe
24 assumption? He didn't just drive to the airport.

25 (A discussion was held off the record.)

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EFTA_00006819

EFTA00158404

1 BY MR. EDWARDS:

2 Q. So, do you know where it was that
3 Mr. Brunel flew in from?

4 A. No.

5 Q. Do you know where Mr. Brunel generally
6 lives? I mean is it New York, is it --

7 A. I know that he spends some time in Florida, in
8 Miami, but exactly where he is, I don't know.

9 Q. But obviously he wouldn't fly here to Palm
10 Beach from Miami, right, so he had to be coming from
11 somewhere else you would assume?

12 A. Yes, I assume.

13 Q. Were you told -- similar to the way that
14 you have been describing throughout the deposition,
15 you're told who is coming in town. Were you told he
16 was going to be at the house?

17 A. Yeah. Usually he requires to be picked up, so
18 I know that he is coming.

19 Q. Okay. We'll go through some other
20 instances where you had occasion to pick him up or
21 break plans, but talking specifically about last
22 week: When were you first told that Mr. Brunel was
23 going to be coming into town?

24 A. I think Igor told me that he has to go and
25 pick him up.

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EFTA_00006820

EFTA00158405

1 Q. How did he --

2 A. It was my day off, I guess, because usually I
3 am the one who pick up people. So, I guess it was my
4 days off and Igor was working, so he went to pick him
5 up.

6 Q. Okay. It wouldn't be [REDACTED] [REDACTED] picking
7 him up?

8 A. No.

9 Q. So, to the best of your recollection Igor
10 picked up Jean Luc Brunel sometime last week from
11 the airport and took him to the house?

12 A. Right.

13 Q. Do you know what car he took to pick him
14 up?

15 A. I think Cadillac Escalade.

16 Q. The black Escalade?

17 A. Yes.

18 Q. And what did Mr. Brunel and Mr. Epstein do
19 for the three day stay when Mr. Brunel was staying
20 at Mr. Epstein's house last week?

21 MR. GOLDBERGER: Form.

22 THE WITNESS: I don't know.

23 BY MR. EDWARDS:

24 Q. Did you interact, communicate with
25 Mr. Brunel?

1 A. Yes.

2 Q. And what did he say as to why he was here?

3 MR. GOLDBERGER: Form.

4 THE WITNESS: Good morning. How are you?

5 Exchange handshake. And I saw him in the

6 kitchen and he was cooking something and that's

7 it.

8 BY MR. EDWARDS:

9 Q. When you say he was cooking something, he
10 was personally cooking?

11 A. Yes.

12 Q. All right. So, this is a house that he is
13 familiar enough with and he is a regular enough
14 guest that he makes himself at home?

15 A. Yes.

16 Q. Okay. And last week do you remember
17 anything in the three-day period that Mr. Brunel was
18 staying at the house that Mr. Brunel did from the
19 time he woke up to the time that he went to sleep?

20 MR. GOLDBERGER: Form.

21 BY MR. EDWARDS:

22 Q. I mean did go to the movies? Did he go to
23 the beach? Did they just hang out around the house
24 and walk?

25 A. Yeah. I think he walked outside to the beach.

1 He was swimming in the pool, talking on the phone just
2 what I remember.

3 Q. Okay. During the three-day stay last
4 week, how often were -- I mean, I assuming that he
5 came in town to see Mr. Epstein; is that true?

6 A. Yes.

7 Q. And so the majority of his time during
8 that three days was spent hanging around with
9 Mr. Epstein?

10 A. Yes.

11 Q. All right. Did you see them talking with
12 one another?

13 A. Yes.

14 Q. Where were they talking with one another?

15 A. In the cabana, outside sitting next to the
16 pool.

17 Q. All right. And when you said that
18 Mr. Brunel walked to the beach, did Mr. Epstein walk
19 to the beach with him?

20 A. No.

21 Q. Mr. Brunel walked alone?

22 A. Yes.

23 Q. Who else was in the house last week while
24 Mr. Brunel was in the house?

25 A. [REDACTED], [REDACTED], and [REDACTED], I think.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 Q. [REDACTED] [REDACTED]?

2 A. Yes.

3 Q. And [REDACTED] [REDACTED]?

4 A. Yes.

5 Q. Okay. Who else, Igor?

6 A. Igor. I guess that's it.

7 Q. Did you overhear any of the substance of
8 the conversations that Mr. Brunel was having with
9 Mr. Epstein?

10 A. No.

11 Q. All right. What is your understanding as
12 to the relationship between Mr. Brunel and
13 Mr. Epstein?

14 A. I guess they are friends.

15 Q. Okay. In addition to being friends --
16 well, let me ask this question first: Do you know
17 when they became friends?

18 A. No.

19 Q. You don't know how long they have known
20 each other?

21 A. No.

22 Q. You don't know who introduced them?

23 A. No.

24 Q. They could have met since they were five
25 years old or they could have met five years ago for

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 all you know?

2 A. Yes.

3 Q. In addition to being friends, do you know
4 them to be -- have a business relationship with one
5 another?

6 A. I don't know.

7 Q. Do you know what Mr. Brunel does for a
8 living?

9 A. I think he has some modeling agency, owner of
10 some modeling agency. I don't know exactly where, which
11 one.

12 Q. Why do you think that? Why do you think
13 he is involved with a modeling agency?

14 A. I think somebody told me.

15 Q. Okay. That's fair enough. Who?

16 A. I don't remember who.

17 Q. Would it be [REDACTED] or Mr. Epstein?

18 A. It could be.

19 Q. And whether it was [REDACTED] or -- whoever
20 told you about this was one of the people that you
21 have previously described as being within the
22 Jeffrey Epstein organization?

23 A. Yes.

24 Q. And as you sit here today, you can't say
25 definitely it was one person within the organization

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EFTA_00006825

EFTA00158410

1 but it was one of those people you named?

2 A. Correct.

3 Q. Most likely [REDACTED]?

4 A. Yes.

5 Q. Okay. And do you remember in what context
6 she told you Mr. Brunel is in -- is involved in the
7 modeling industry or modeling agency?

8 A. No.

9 Q. Would you know the name of his modeling
10 agency?

11 A. No.

12 Q. Have you heard the name, MC Squared or
13 MC2?

14 A. Yes.

15 Q. And where have you heard that?

16 A. In one of the magazines it mentions, I read an
17 article about modeling. It mentioned a couple of them
18 Casablanca, MC2 and.

19 Q. Casablanca?

20 A. Yeah. They are some other agencies.

21 Q. Casablanca, where have you heard that name
22 before?

23 A. I heard that in one of the magazines, I think.

24 Q. Is there a person with that last name that
25 is also friends with Brunel that you're aware of?

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EFTA_00006826

EFTA00158411

1 A. Yeah. I don't know. Yeah, John Casablanca.

2 Q. He is friends with Jean Luc Brunel?

3 A. I don't know. That was the fourth modeling
4 agency I think.

5 Q. And have you ever seen John Casablanca?

6 A. No.

7 Q. Okay. But you know him to be associated
8 with a modeling agency?

9 A. I mean I heard the name. I heard about his
10 agency, modeling agency, but I don't know who he is.

11 Q. Did you hear his name from Jean Luc Brunel
12 or Mr. Epstein?

13 A. No.

14 Q. Okay. So, other than seeing Jean Luc
15 Brunel at the house last week and talking with
16 Mr. Epstein by the pool or by the cabana or around
17 the house, did you make any other observations as to
18 what Mr. Brunel was doing in town?

19 A. No.

20 Q. Did you overhear anything else that
21 Mr. Brunel was speaking to Mr. Epstein about or
22 vice-versa?

23 A. No.

24 Q. In addition to when you would see
25 Mr. Epstein and Mr. Brunel talking or communicating

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EFTA_00006827

EFTA00158412

1 with one another, who else was usually around?

2 A. I don't see anybody.

3 Q. I mean, was [REDACTED] with them or [REDACTED] or
4 anybody else?

5 A. Yeah. I guess, yes. He sometimes ask for
6 coffee or tea, so either [REDACTED] or [REDACTED] bring him a tea
7 or coffee. So, probably they -- it was a moment when
8 they were together talking and either [REDACTED] or [REDACTED]
9 brought them something to drink, but I don't know. I
10 don't see them.

11 Q. During his three-day stay did you see any
12 other females around the house aside from [REDACTED] and
13 [REDACTED]?

14 A. Yeah. There was one. What's her name, [REDACTED].

15 Q. [REDACTED]?

16 A. [REDACTED].

17 Q. [REDACTED].

18 A. Yeah.

19 Q. What's her last name?

20 A. I don't know her last name.

21 Q. And was she with Mr. Brunel?

22 A. No. She was also picked up by Igor from the
23 airport.

24 Q. Do you know where she came from?

25 A. No.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 Q. Were you told that she was coming in town?

2 A. Igor told me because he has to pick her up.

3 It was my day off.

4 Q. All right. I don't think that I am
5 familiar with that person, [REDACTED]. Is that somebody
6 who has been to the house before?

7 A. No.

8 Q. First time that you saw her was last week?

9 A. Yes.

10 Q. Okay. And did she seem to know Jean Luc
11 Brunel?

12 A. I don't know.

13 Q. You couldn't tell by the interactions or
14 anything like that?

15 A. No.

16 Q. To you they could have been complete
17 strangers, or they could have known each other
18 forever?

19 A. Yes.

20 Q. Okay. Do you go out of your way not to
21 observe? I mean, is that -- that's a bad way to ask
22 the question. Is it your job when people are around
23 the house to kind of stay away or stay in the
24 background?

25 MR. GOLDBERGER: Form.

1 THE WITNESS: I mean, it's not, I try to
2 not be around them. You know, it's not -- my
3 job is to make sure that everything is what
4 they ask for. I don't want to be around them
5 and listen when they are talking and looking at
6 whom they are talking. I try to stay away,
7 yes, as long as possible.

8 BY MR. EDWARDS:

9 Q. And when I ask questions about your
10 knowledge based on your observations, I mean
11 obviously you've seen me talking with your attorney,
12 Jack Goldberger, today and you can tell that we've
13 talked at some point in time in the past, right;
14 that today isn't the first time we've ever talked to
15 one another.

16 And that's kind of what I am asking you
17 about this person [REDACTED]. Just based on your
18 observations and common sense, could you tell that
19 this person, [REDACTED], knew Jean Luc Brunel before last
20 week?

21 A. I don't think so.

22 Q. Okay. How old would you estimate or
23 approximate this person [REDACTED] to be assuming you don't
24 know her age?

25 A. I think in her 30's or late 20's.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 Q. And was she a model? Is she a model?

2 A. I don't know.

3 Q. What did you see her do -- strike that.

4 How long did she stay at the house?

5 A. Four days, I think.

6 Q. Do you know how Mr. Epstein knows [REDACTED]?

7 A. No.

8 Q. Is [REDACTED] friend or [REDACTED] friend or
9 Mr. Epstein's friend? Who was she there to see?

10 A. I would say Mr. Epstein's friend.

11 Q. All right. And where did she sleep while
12 she was in town?

13 A. One of the guest rooms.

14 Q. Based on your observations could you tell
15 if Mr. Epstein was romantically or intimately
16 involved with [REDACTED]?

17 A. No.

18 Q. Based on your observations could you tell
19 if Jean Luc Brunel was intimately involved with [REDACTED]?

20 A. No.

21 Q. No. You can't tell or, no, they were not?

22 A. No, I cannot tell.

23 Q. Okay. So, is there anything more that you
24 can tell me about what her possible purpose for
25 being in town or why she was there?

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EFTA_00006831

EFTA00158416

1 A. No. She was a guest, I assume.

2 Q. Any reason why there would be an overlap
3 between her staying at the house and Jean Luc
4 staying at the house, or it was just coincidence as
5 far as you could tell?

6 A. I don't know.

7 Q. Okay. And is there anywhere where you've
8 written down or documented what [REDACTED] last name is?

9 A. No.

10 Q. Did you take her back to the airport?

11 A. Yes.

12 Q. And what day did you take her to the
13 airport?

14 A. Yesterday.

15 Q. Yesterday. So, she was here four days.
16 She got here last Thursday or Friday?

17 A. I think Friday.

18 Q. And she was at the house for a period of
19 time when Jean Luc Brunel was at the house?

20 A. Yeah. I mean, last week, yes.

21 Q. Okay. So, she got there Friday. When did
22 Jean Luc Brunel finally leave Mr. Epstein's house?

23 A. I think Monday, yeah, Monday. He left Monday.

24 Q. That's yesterday?

25 A. Or Sunday.

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EFTA_00006832

EFTA00158417

1 Q. Today is Tuesday.

2 A. Today is Tuesday. Yes, I think Sunday.

3 Q. Okay. So, on Sunday Jean Luc Brunel left
4 and on Monday [REDACTED] left?

5 A. Yes.

6 Q. All right. Did you take Jean Luc Brunel
7 to the airport?

8 A. No.

9 Q. All right. Did Igor?

10 A. [REDACTED].

11 Q. [REDACTED] [REDACTED]. And do you know where he
12 was flying to?

13 A. No.

14 Q. You don't know where he came from or where
15 he was flying to?

16 A. Right.

17 Q. Right. And as of right now you have no
18 knowledge as to where he primarily resides, whether
19 that -- I know you said that he spends some time in
20 Miami, but whether he primarily resides in Miami or
21 New York or Antartica, you have no idea?

22 A. No.

23 Q. Okay. Other than last week, when was the
24 last time that you saw this gentleman Jean Luc
25 Brunel at Jeffrey Epstein's house?

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EFTA_00006833

EFTA00158418

1 A. He was here -- I don't remember exactly, maybe
2 like a month, two months ago.

3 Q. So, it's February 16th, right now. Do you
4 think that it was sometime in January of 2010?

5 A. Could be.

6 Q. All right. And would this be at the
7 beginning of January, the middle or the end of
8 January 2010, if you remember?

9 A. No, I don't remember.

10 Q. And did you pick him up from the airport
11 on that occasion?

12 A. Yes, I think so.

13 Q. All right. And what airport was that?

14 A. I think it was Palm Beach Airport.

15 Q. Do you know where he flew into that time?

16 A. No.

17 Q. And did he fly a private jet or a
18 commercial airline?

19 A. Commercial.

20 Q. Does he always fly commercial when he
21 comes into town?

22 A. Yes, most of the time.

23 Q. Have you ever known him to fly on one of
24 Jeffrey Epstein's airplanes?

25 A. I think on one occasion he went with him to

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EFTA_00006834

EFTA00158419

1 New York.

2 Q. Okay. And is it your understanding that
3 the modeling agency that he is associated with is a
4 modeling agency based out of New York?

5 A. I don't know. New York or Miami. I'm not
6 sure.

7 Q. Okay. Well, MC Squared is a modeling
8 agency that has an office in New York and Miami.

9 A. Oh, oh.

10 Q. Is that something that you know is
11 consistent with your observation and your knowledge?

12 A. No.

13 Q. You don't know?

14 A. No, I don't know.

15 Q. You say New York or Miami because those
16 are the only two cities that you associate Jean Luc
17 Brunel with in terms of what you know?

18 A. Yes.

19 Q. How do you know that he spends a
20 considerable amount of time in Miami?

21 A. I have no idea.

22 Q. Just from word around the house or
23 something? I mean, you had to know that from
24 something, right?

25 A. No. On one occasion I know that he was going

1 to Miami.

2 Q. Okay.

3 A. But how long he stay in Miami, how long he
4 stays outside of Miami, I have no idea.

5 Q. And when was that occasion where you know
6 that Jean Luc Brunel was in Miami or spending time
7 in Miami?

8 A. I think at one point I drove him to Miami.

9 Q. And when was that?

10 A. I think the time he was here in this month of
11 January. I think I drove him back to Miami from, from
12 the Palm Beach, Palm Beach house.

13 Q. Okay. So, that time in January he flies
14 into the Palm Beach airport from some undisclosed or
15 unknown location, you take him to the Palm Beach
16 house, right?

17 A. Right.

18 Q. How long does he stay on that occasion?

19 A. Maybe three days.

20 Q. And during that three-day period were any
21 other -- did any females accompany him to the Palm
22 Beach house?

23 A. No. I don't remember. I don't recall.

24 Q. Well, maybe this will jog your memory:
25 When you drove him to Miami, did you drive him

1 alone --

2 A. Yes.

3 Q. -- or did you drive him with somebody
4 else?

5 A. Alone.

6 Q. Okay. And where did you take him to in
7 Miami?

8 A. I don't know. He left -- he told me his car,
9 one of his friends somewhere in Miami Beach, so I
10 dropped him over there and he pick up his car over
11 there.

12 Q. And who is his friend, do you know?

13 A. I don't know.

14 Q. So, his car was in Miami?

15 A. Yes.

16 Q. What kind of car was that?

17 A. Mercedes.

18 Q. All right. And do you remember where it
19 was in Miami that his car was parked?

20 A. Some -- I don't remember the others, but
21 somewhere in Miami Beach.

22 Q. All right. At a condo, at an apartment,
23 on the side of the road, a house?

24 A. No. It was a private house.

25 Q. A private house on Miami Beach. Do you

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EFTA_00006837

EFTA00158422

1 know the name of the person that lived at that
2 house?

3 A. No.

4 Q. All right. In talking about this person
5 Jean Luc Brunel, would -- you said he came here last
6 week. He came here in January. Stayed three or
7 four days each time, two consecutive months. Since
8 Mr. Epstein has been out on house arrest is Jean Luc
9 Brunel one of the people that visits on a monthly
10 basis?

11 A. No.

12 Q. Okay.

13 A. There was no regular visit. It's just
14 occasionally I would say.

15 Q. Okay. So, prior to the January visit,
16 when is the previous time that Jean Luc Brunel was
17 at Mr. Epstein's house?

18 A. I don't remember. I don't remember.

19 Q. Is he one of the people who frequently
20 calls Mr. Epstein?

21 A. Yes.

22 Q. And Mr. Epstein frequently calls him?

23 A. I don't know.

24 Q. Okay. Well, I guess you would only know
25 the calls that come in and you take messages, right?

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EFTA_00006838

EFTA00158423

1 A. Right.

2 Q. How times would you estimate -- I know you
3 told us two times in 2010. Let me ask it this way:
4 In 2010 were there only those two occasions where
5 Mr. Brunel was staying at Mr. Epstein's house in
6 Palm Beach?

7 A. Yes, as far as I remember.

8 Q. Okay. How many occasions, in addition to
9 those two, would you estimate that Mr. Brunel has
10 stayed at the Palm Beach house since Mr. Epstein has
11 been out on house arrest and also staying at that
12 house?

13 A. It's hard to tell. I would say maybe three
14 times.

15 Q. Three times in addition to the two times
16 this year, five times total?

17 A. No, three times total.

18 Q. Okay. So, one time this month, one time
19 last month, and then for the period of time from --
20 I don't remember when he was on house arrest, maybe
21 July. So from July to December you think that there
22 was only one other occasion when Mr. Brunel was at
23 the house?

24 A. You know, it's hard to remember but I think
25 so. He was maybe totally three times for the last few

1 months. I don't really recall how many times.

2 Q. Okay. Did Mr. Brunel ever stay at the
3 Palm Beach house while Mr. Epstein was in jail?

4 A. No.

5 Q. Did anybody stay at the house while
6 Mr. Epstein was in jail?

7 A. No.

8 Q. Including [REDACTED] or [REDACTED]?

9 A. I mean, when he was in jail, the house wasn't
10 finished completely yet. So, there was no visitors.
11 The house was finished before he got released. So I, I
12 don't think, I don't recall that anybody was -- it was
13 impossible to have somebody, you know, stay in the
14 house.

15 Q. Do you know when Mr. Brunel is going to
16 come back to the Palm Beach house?

17 A. No.

18 Q. You haven't been told?

19 A. No.

20 Q. All right. We've gone over a lot of
21 individuals that come to Mr. Epstein's house at
22 various times, and I think you have given me a
23 pretty good list. But from the time he was out on
24 house arrest, who else that we have not talked about
25 has stayed the night at Mr. Epstein's house?

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EFTA_00006840

EFTA00158425

1 Meaning if Alan Dershowitz stayed there, I want to
2 know. If some girls flew in from New York, I want
3 to know. And I am just giving you generic examples.

4 A. As far as I recall it was -- one girl, her
5 name was [REDACTED], [REDACTED].

6 Q. That's another girl, right? That's a
7 separate girl?

8 A. Right. And I guess that's it.

9 Q. Okay. How many times has [REDACTED] been to
10 Mr. Epstein's house since Mr. Epstein has been on
11 house arrest?

12 A. Two or three times.

13 Q. Do you know where she comes from?

14 A. No.

15 Q. Do you pick her up from the airport?

16 A. Yes.

17 Q. So, she flies in from out of town?

18 A. Right.

19 Q. Your understanding is that it's New York
20 or you really have no idea?

21 A. No idea.

22 Q. How about [REDACTED]?

23 A. Same things.

24 Q. Been two or three times, comes from out of
25 town, you don't know where she's coming from?

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EFTA_00006841

EFTA00158426

1 A. Right.

2 Q. How old are these people, [REDACTED] and
3 [REDACTED]?

4 A. In their 20's.

5 Q. And when they come, do they, do either of
6 them sleep with Mr. Epstein?

7 A. No.

8 Q. Both sleep in different rooms?

9 A. Right.

10 Q. Is it your understanding based on your
11 observations that either of them are intimately
12 involved with Mr. Epstein?

13 A. No.

14 Q. No idea?

15 A. No idea.

16 Q. Any reason to believe that either of them
17 are intimately or romantically involved with [REDACTED]
18 [REDACTED] or [REDACTED]?

19 A. No.

20 Q. Okay. Do you know the purpose for them
21 coming in town?

22 A. No.

23 Q. Do you know the last name of [REDACTED] or
24 [REDACTED]?

25 A. No.

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EFTA_00006842

EFTA00158427

1 Q. All right. And you told me that while he
2 was in jail nobody came to the house. So, let's
3 back up before that from the search warrant to him
4 going to jail, he was not at the house, Jeffrey
5 Epstein was not at the house, right?

6 A. Right.

7 Q. So, we can back this time table up to you
8 beginning to work in February of 2005 through search
9 warrant executed on October 20th, 2005, which gives
10 us ten or so months there.

11 In those ten months, how many times has
12 Jean Luc Brunel come to visit?

13 A. I don't know. Maybe twice, once. He wasn't
14 very often visiting him.

15 Q. You think he what?

16 A. He wasn't very often visiting him.

17 Q. Okay. And on those occasions was it
18 similar in that he would stay three or four days or
19 would he stay longer?

20 A. No, three or four days no longer.

21 Q. And even back then in 2005, did you know
22 where he was coming from?

23 A. No.

24 Q. And on those occasions prior to the search
25 warrant being executed, were females in the house

1 along with Jean Luc Brunel that you remember?

2 A. Yeah. I think that was -- [REDACTED] was there. I
3 think some other guests too, but I don't remember --

4 Q. What about the --

5 A. -- who was there and how long they were
6 staying.

7 Q. How about the young females that were
8 providing massages, did any of them ever provide a
9 massage to Mr. Brunel that you remember?

10 A. No, I don't remember.

11 Q. Okay. Is that something that you're
12 saying never happened or you just don't remember
13 whether it happened or it didn't?

14 A. I just don't recall, you know, having those
15 massage girls coming and having him being in the house.

16 Q. Okay. Well, we have gone, kind of gone
17 through the frequency with which these girls came.
18 And at least in terms of Mr. Epstein being at the
19 house, if he was there for four days then they would
20 come three days or relatively that's the ratio we've
21 talked about.

22 So, if Mr. Brunel was there for a period
23 of four days straight, you know, just given
24 Mr. Epstein's massage schedule, so to speak, does
25 that help to remind you or refresh your recollection

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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1 as to whether or not these girls were in the house
2 at the same time that Mr. Brunel was in the house?

3 A. Could be.

4 Q. But if they came over, you don't remember
5 whether Mr. Brunel was also given a massage?

6 A. No, I don't, I don't remember. I don't even
7 know.

8 Q. Other than massages for Mr. Epstein by
9 these young females, are you able to say that
10 anybody else received a massage from any of these
11 girls?

12 MR. GOLDBERGER: Form.

13 THE WITNESS: I don't know.

14 BY MR. EDWARDS:

15 Q. Are you saying it could have happened, it
16 might not have happened; you just don't remember?

17 A. I haven't seen, no --

18 MR. GOLDBERGER: Form.

19 THE WITNESS: -- or being told it.

20 MR. EDWARDS: Okay.

21 THE WITNESS: This other person has some
22 kind of massage.

23 BY MR. EDWARDS:

24 Q. Okay. Did Mr. Brunel ever arrive with
25 other females to stay on any of the occasions back

1 in 2005?

2 A. I don't remember. I haven't seen him.

3 Q. Excuse me?

4 A. I don't remember. I haven't seen him coming
5 with the other, I would say guests or other company, or
6 I have seen him coming alone. Every time I pick him up,
7 he was alone.

8 Q. Did you talk to him when you would give
9 him rides to and from the airport or to and from
10 Miami?

11 A. Yeah. We talk on the way to Miami.

12 Q. Would he tell you why he was here or what
13 he was doing, business?

14 A. No. Just, you know, pep talk I would say.

15 Q. Pep talk? Who was giving who the pep
16 talk?

17 A. He was the one who talk a lot.

18 Q. It's my understanding that Mr. Epstein
19 does not drink, right?

20 A. Right.

21 Q. And by that I mean I am talking about
22 alcohol, obviously.

23 A. Yes.

24 Q. How about Mr. Brunel?

25 A. I haven't seen him drinking either.

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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1 Q. Okay. Also my understanding Mr. Epstein
2 doesn't smoke, use drugs, any of those things?

3 A. That's true, yes.

4 Q. Mr. Brunel, have you seen him?

5 A. No.

6 Q. Have you seen him smoke?

7 A. Yeah, he smokes.

8 Q. He does?

9 A. Yes.

10 Q. Use drugs?

11 A. (Witness shakes head.)

12 Q. Not that you've seen?

13 A. No.

14 Q. Have you ever gone on any of the airplanes
15 that are owned by Mr. Epstein?

16 A. Yes. I was once when I got this job first
17 time because I came here first time without my
18 belongings. So, I told them can I get a ride to New
19 York, pick up my stuff and I went here. So, one time I
20 flew from here to New York.

21 Q. Was anybody else on the airplane that
22 time?

23 A. Yeah. It was [REDACTED], him, [REDACTED]. That's it.

24 Q. And is it your understanding that [REDACTED]
25 has ever been intimately involved with Mr. Epstein?

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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1 A. No.

2 Q. How about Ghislaine Maxwell?

3 A. No.

4 Q. To the best of your knowledge you never
5 knew anything about that?

6 A. I don't know what's going on.

7 Q. All right. Have you ever heard the name
8 [REDACTED]?

9 A. No.

10 Q. [REDACTED], do you know who that is?

11 A. No.

12 Q. [REDACTED], do you know her?

13 A. Yes.

14 Q. How do you know [REDACTED]?

15 A. She works for Ghislaine Maxwell, her
16 assistant.

17 Q. In New York?

18 A. In New York.

19 Q. And have you ever known [REDACTED] to have
20 been linked to Mr. Epstein in a physical
21 relationship?

22 A. No.

23 Q. What do you think that she does for
24 Ghislaine Maxwell?

25 A. I guess she organize her schedule and do some,

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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1 some stuff for her.

2 Q. Well, what does Ghislaine Maxwell do that
3 needs organizing, do you know?

4 A. I guess she has a lot of social events.

5 Q. Okay. Have you ever met?

6 A. Put down --

7 Q. I'm sorry.

8 A. She has to put down everything.

9 Q. Have you ever met [REDACTED]?

10 A. Yes.

11 Q. Was that at the Palm Beach house?

12 A. She was here a few times, and I met her up in
13 New York.

14 Q. When was the last time that you met Dana
15 Burns or saw [REDACTED]?

16 A. I would say two years ago.

17 Q. Just before Mr. Epstein was in jail?

18 A. Or after.

19 Q. Where did you see her?

20 A. Yeah. I think, yeah, she was here for a few
21 days working [REDACTED]

[REDACTED].

23 Q. And is that during the time period when
24 Mr. Epstein was out on work release?

25 A. Yes.

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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█ [REDACTED]

9 Q. Nobody. So, when [REDACTED] was working
 10 [REDACTED], do you know what
 11 she was doing?

12 A. She was in the office answering phone calls,
 13 doing some e-mails, answering mail I guess.

14 Q. Okay. And you saw her [REDACTED]
 █ [REDACTED]?

16 A. Yes.

17 Q. Okay. Did she stay at [REDACTED] or at
 18 [REDACTED] when she was in town?

19 A. No, no.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

23 Q. What is your, what is your understanding
 24 as to the names of the employees that work for [REDACTED]
 █ [REDACTED]. Mr. Epstein, who else?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 A. [REDACTED].

2 Q. Do you know what he does?

3 A. [REDACTED] is involved too.

4 Q. Do you know what [REDACTED] [REDACTED] does for the
5 Florida Science Foundation?

6 A. No.

7 Q. That's just somebody who you've seen
8 working [REDACTED]?

9 A. Yes.

10 Q. When you've had occasion to go there, and
11 I am assuming you have been there numerous times,
12 right?

13 A. Right.

14 Q. The people who have offices within [REDACTED]
[REDACTED] are Mr. Epstein?

16 A. Yes.

17 Q. And Mr. [REDACTED]? I am asking.

18 A. Yes.

19 Q. And Ms. [REDACTED]?

20 A. Yes.

21 Q. And who else within that office has, has
22 their own office [REDACTED]?

23 A. Nobody. There are three offices, one
24 conference room.

25 Q. Okay.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 A. So, one is for [REDACTED] [REDACTED], another is for
2 [REDACTED].

3 Q. So, to the best of your knowledge the
4 regular employees, based on your observations, are
5 Mr. Epstein, Mr. [REDACTED] and Ms. [REDACTED]?

6 A. Yes.

7 Q. Okay. And at least on a couple of
8 occasions you have seen [REDACTED] there?

9 A. Right.

10 MR. EDWARDS: All right.

11 RE CROSS (JANUSZ BANASIAK)

12 BY MR. MERMELSTEIN:

13 Q. I have just one follow-up question. What
14 is the reason that you come to the office on a
15 regular basis [REDACTED]?

16 A. I bring Mr. Epstein from jail.

17 Q. You bring him from jail?

18 A. Right, to the office and take him back to
19 jail.

20 Q. That was when he was on work release,
21 right?

22 A. Right.

23 Q. Is there any other occasion that you --
24 for that purpose you were given a card for access to
25 the garage?

1 A. Yes, yes.

2 Q. Before Mr. Epstein was in jail, were there
3 occasions where you came to the office here?

4 A. Before jail?

5 Q. Before jail.

6 A. Yeah. I was, I was the one who organize, you
7 know, put everything together, bring furniture, bring
8 some things over there.

9 Q. You set up the office?

10 A. Yes.

11 Q. When was that?

12 A. Oh, I don't remember exactly. When he was in
13 jail.

14 Q. Before he was in jail or during the time
15 he was in jail?

16 A. I think before.

17 Q. How long before he went to jail did you
18 set up the office?

19 A. A few months, two, three. I don't remember.

20 Q. After you set up the office, were there
21 occasions where you would come to the Florida
22 Science Foundation office?

23 A. Yes, very often.

24 Q. What would you come for?

25 A. They call me to bring some food for them,

1 lunch, pick up some, bring some papers, office supplies.

2 That's it.

3 Q. You would run errands for the office?

4 A. Yes.

5 MR. MERMELSTEIN: Nothing further.

6 MR. EDWARDS: All right. Are you going to
7 read or waive?

8 MR. GOLDBERGER: We will read. All right.

9 THE COURT REPORTER: Did you want to order
10 this?

11 MR. EDWARDS: Yes, please.

12 THE COURT REPORTER: Did you want a copy,
13 Mr. Mermelstein?

14 MR. MERMELSTEIN: Yes.

15 THE COURT REPORTER: Mr. Goldberger, do
16 you want a copy?

17 MR. GOLDBERGER: Yes. Send it to Critton.
18 Bill him, seriously.

19 (Witness excused.)

20 (Deposition was concluded.)

21

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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CERTIFICATE OF OATH

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
JANUSZ BANASIAK personally appeared before me
and was duly sworn on the 16th day of February,
2010.

Dated this 28th day of February, 2010.

Cynthia J. Hopkins



Cynthia Hopkins, RPR, FPR
Notary Public - State of Florida
My Commission Expires: February 25, 2011
My Commission No.: DD 643788

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C E R T I F I C A T E

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, Cynthia Hopkins, Registered Professional Reporter, Florida Professional Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Dated this 28th day of February, 2010.


Cynthia Hopkins, RPR, FPR

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 DATE: February 28th, 2010
2 TO: JANUSZ BANASIAK
3 c/o Jack Alan Goldberger, Esquire
4 ATTERBURY, GOLDBERGER & WEISS, P.A.

5 [REDACTED]
6 [REDACTED]

7 IN RE: [REDACTED] vs. Epstein

8 CASE NO.: 502008CA028051XXXXMB AB

9 Please take notice that on Tuesday, the 16th of
10 February, 2010, you gave your deposition in the
11 above-referred matter. At that time, you did not
12 waive signature. It is now necessary that you sign
13 your deposition.

14 As previously agreed to, the transcript will be
15 furnished to you through your counsel. Please read
16 the following instructions carefully:

17 At the end of the transcript you will find an
18 errata sheet. As you read your deposition, any
19 changes or corrections that you wish to make should
20 be noted on the errata sheet, citing page and line
21 number of said change. DO NOT write on the
22 transcript itself. Once you have read the
23 transcript and noted any changes, be sure to sign
24 and date the errata sheet and return these pages to
25 me.

If you do not read and sign the deposition
within a reasonable time, the original, which has
already been forwarded to the ordering attorney, may
be filed with the Clerk of the Court. If you wish
to waive your signature, sign your name in the blank
at the bottom of this letter and return it to us.

Very truly yours,

Cynthia J. Hopkins

Cynthia Hopkins, RPR, FPR

I do hereby waive my signature.

JANUSZ BANASIAK

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C E R T I F I C A T E

- - -

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I hereby certify that I have read the foregoing deposition by me given, and that the statements contained herein are true and correct to the best of my knowledge and belief, with the exception of any corrections or notations made on the errata sheet, if one was executed.

Dated this ____ day of _____,
2010.

JANUSZ BANASIAK
Job #1317

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 ERRATA SHEET

2 IN RE: [REDACTED]. VS. EPSTEIN
3 CR: Cynthia Hopkins
4 DEPOSITION OF: JANUSZ BANASIAK
5 TAKEN: February 16, 2010
6 JOB NO.: 1317

7 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
8 PAGE # LINE # CHANGE REASON

9	_____	_____	_____	_____
10	_____	_____	_____	_____
11	_____	_____	_____	_____
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15	_____	_____	_____	_____

16
17 Please forward the original signed errata sheet to
18 this office so that copies may be distributed to all
19 parties.

20 Under penalty of perjury, I declare that I have read
21 my deposition and that it is true and correct
22 subject to any changes in form or substance entered
23 here.

24 DATE: _____

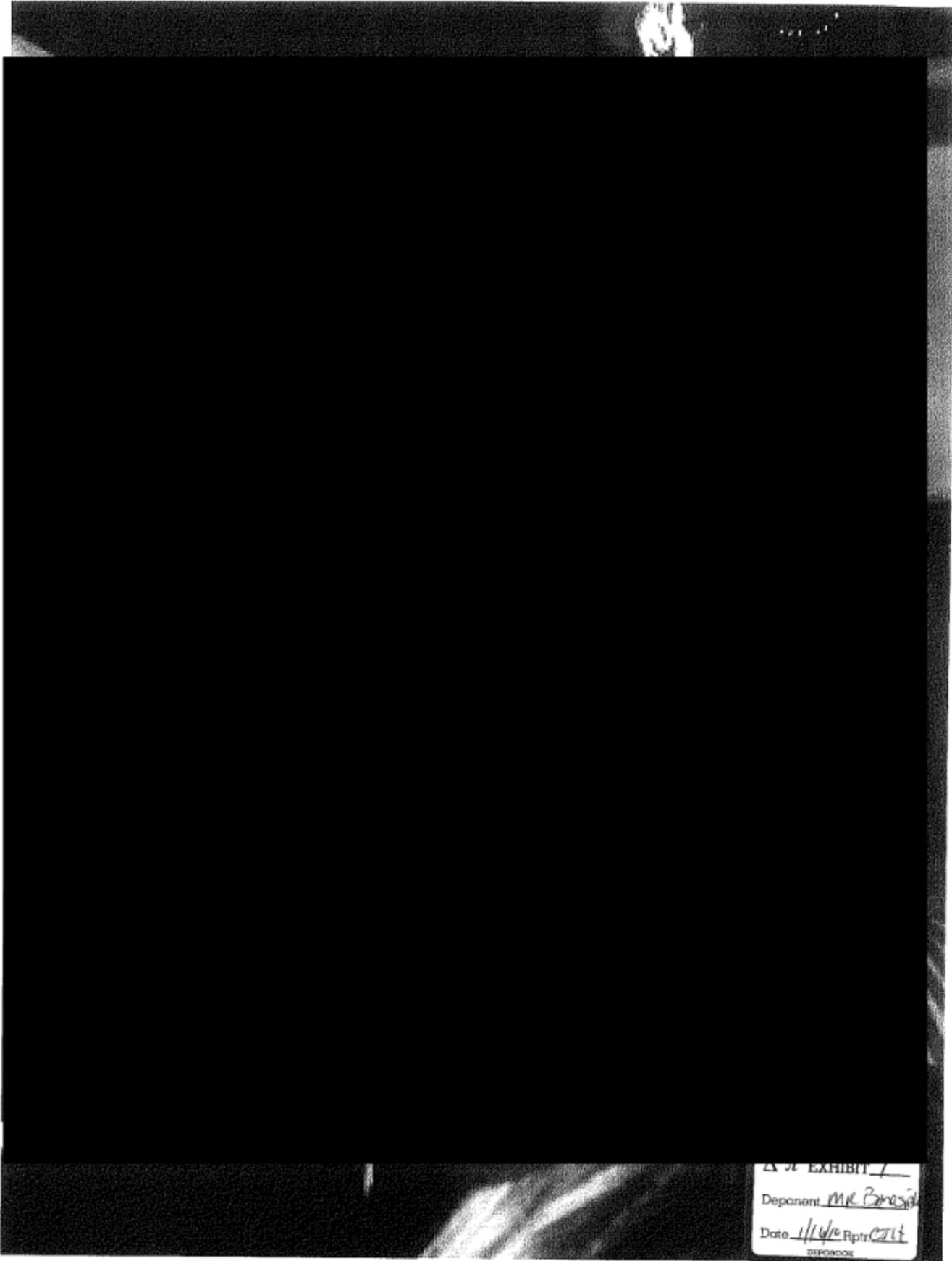
25 SIGNATURE OF
DEPONENT: _____

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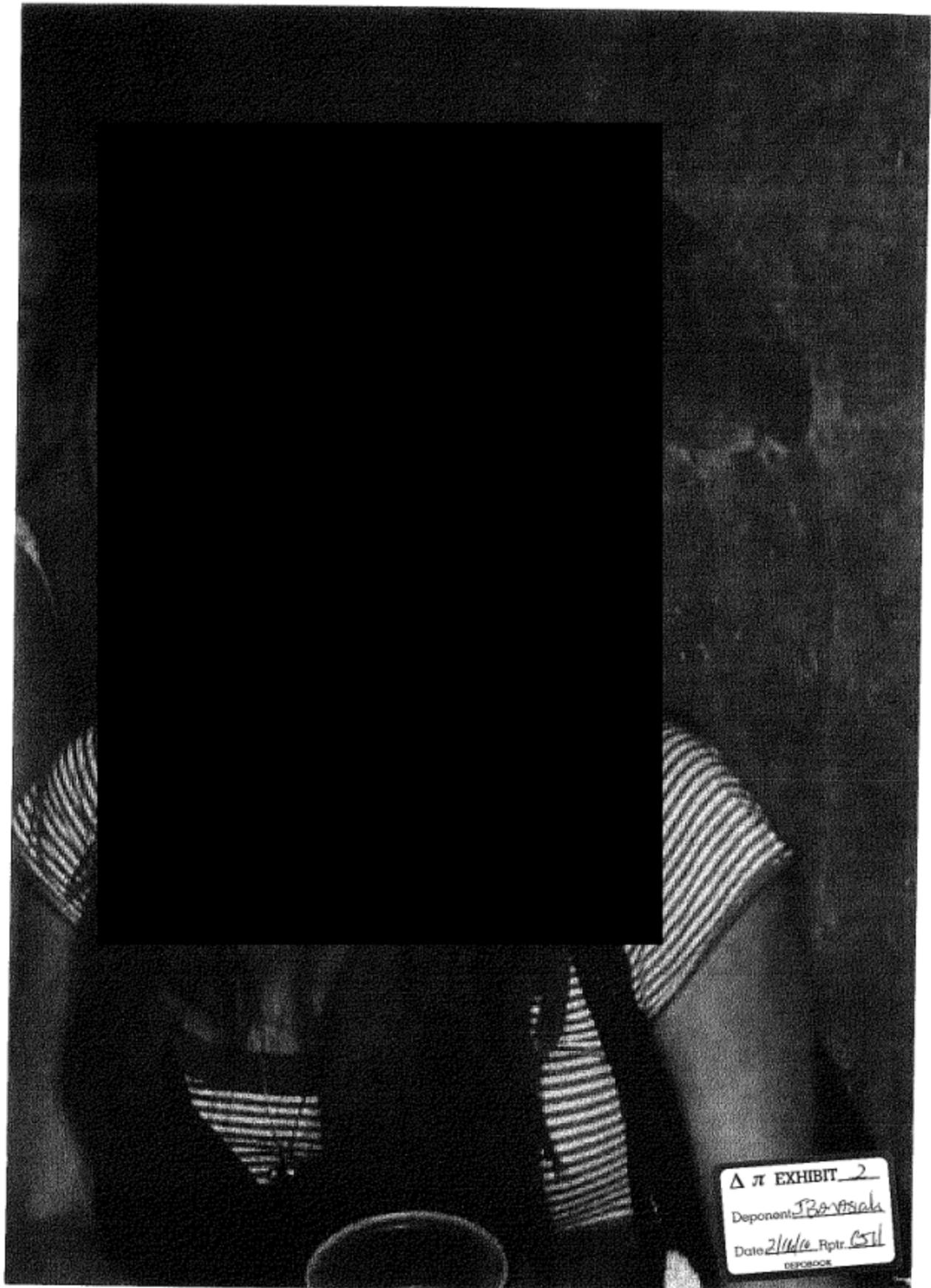
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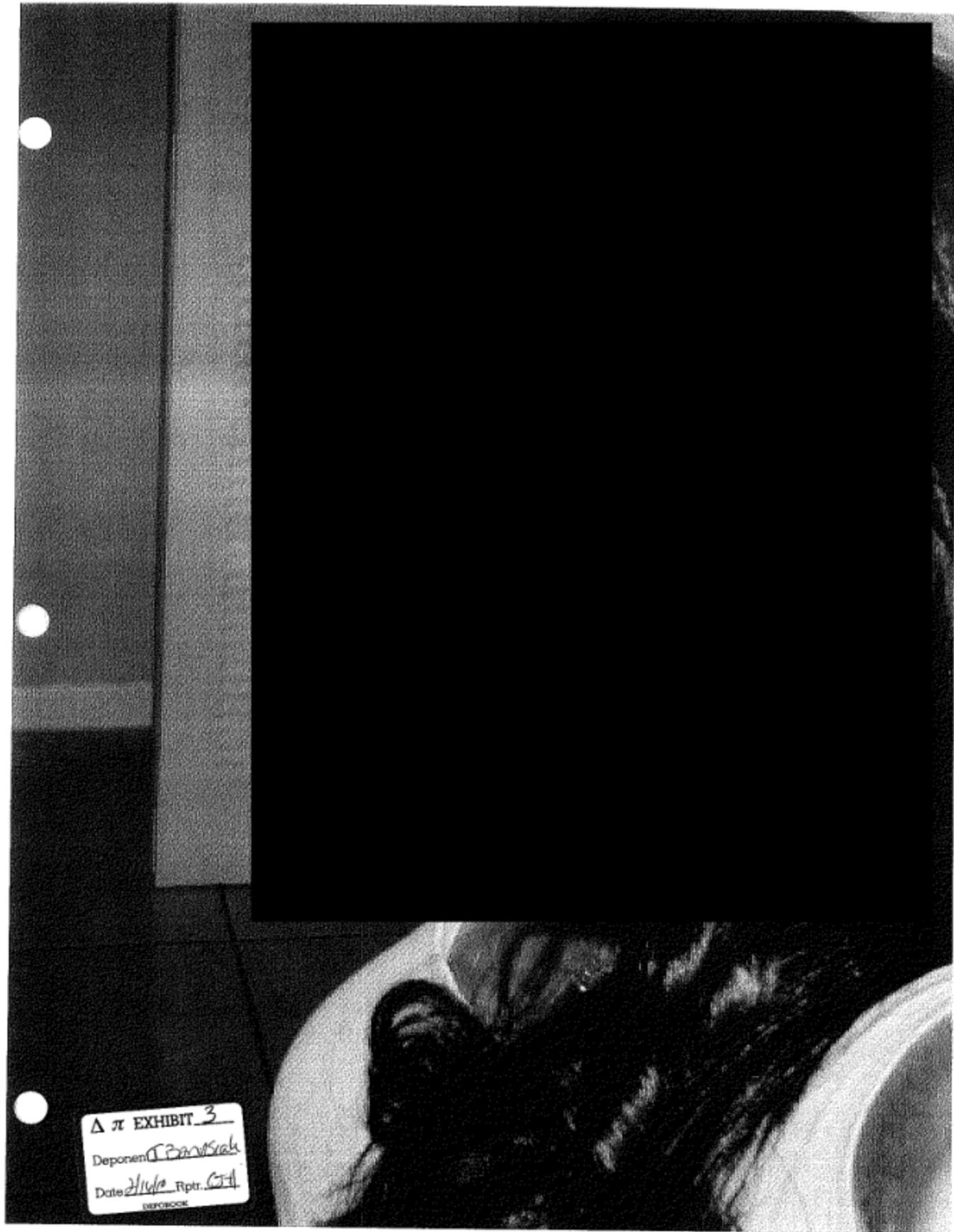
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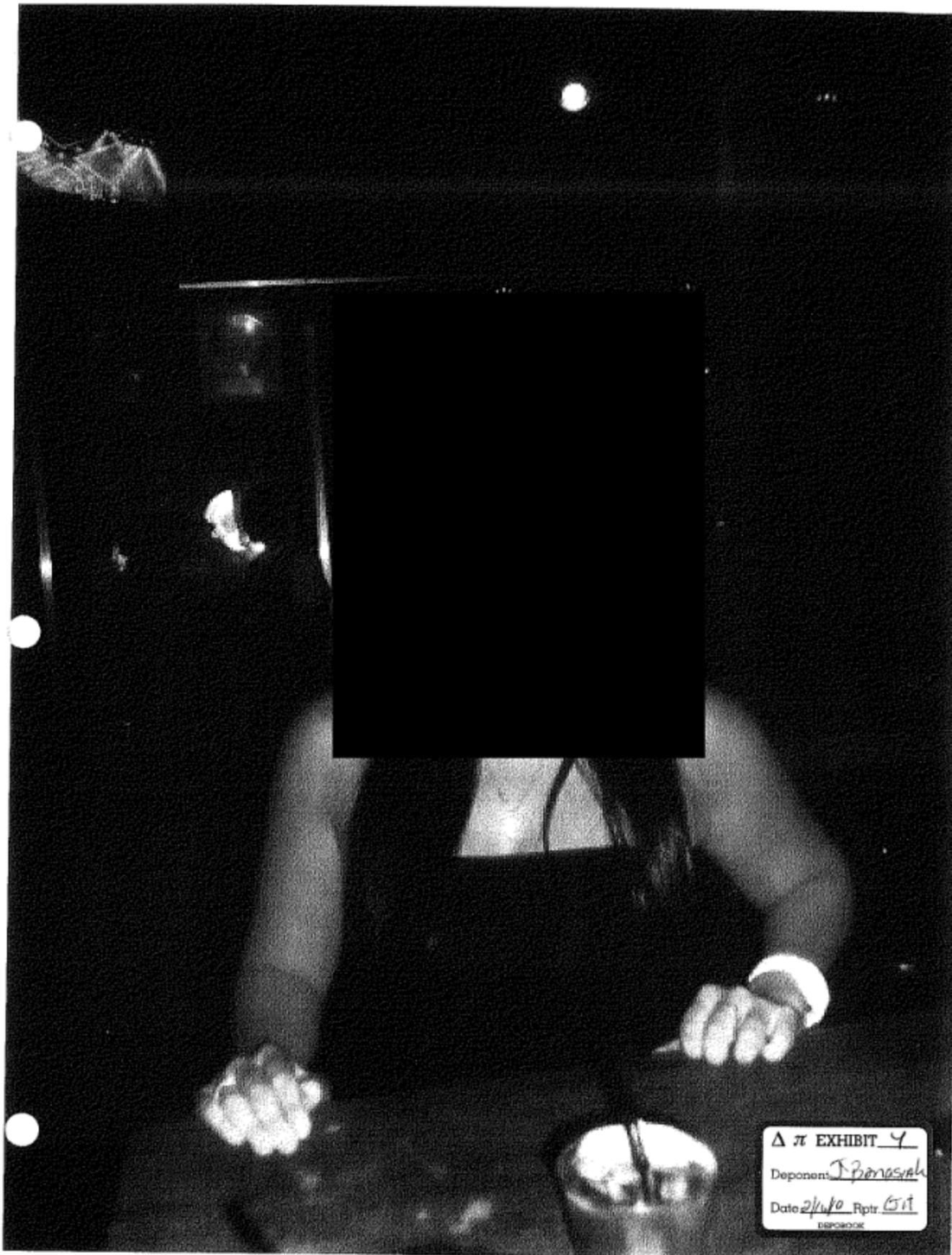
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Δ π EXHIBIT 5
Deponent: Banasik
Date: 2/17/10 Rptr. CSA
DEP00008

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