

**Condensed Transcript**

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

CASE No.

502008CA028051XXXXMB AB

JEFFREY EPSTEIN,

Defendant.  
~~~~~

**DEPOSITION OF**

**LOUELLA RABUYO**

**VOLUME I**

October, 20, 2009

10:10 a.m.

515 N. Flagler Drive  
Suite 200-P  
West Palm Beach, Florida 33401

Reported By: Teresa Whalen, RPR, FPR, Notary Public, State of Florida



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L.M.,  
-vs-  
JEFFREY EPSTEIN,  
Plaintiff,  
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DEPOSITION OF LOUELLA RABUYO  
VOLUME I

Tuesday, October, 20, 2009  
10:10 - 3:30 p.m.

515 N. Flagler Drive, Suite 200-P  
West Palm Beach, Florida 33401

Reported By:  
Teresa Whalen, RPR, FPR  
Notary Public, State of Florida  
West Palm Beach Office Job #118991

3

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2

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA  
3  
4 CASE No. 08-CV-80119-CIV-MARRA/JOHNSON  
5  
6 JANE DOE NO. 2,  
7 Plaintiff,  
8 -vs-  
9 JEFFREY EPSTEIN,  
10 Defendant.

---

11 Related cases:  
12 08-80232, 08-80380, 98-80381, 08-80994,  
13 08-80993, 08-80811, 08-80893, 09-80469,  
14 09-80591, 09-80656, 09-80802, 09-81092

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15 DEPOSITION OF LOUELLA RABUYO  
16 VOLUME I  
17  
18 Tuesday, October 20, 2009  
19 10:10 - 3:30 p.m.  
20  
21 515 N. Flagler Drive, Suite 200-P  
22 West Palm Beach, Florida 33401

23 Reported By:  
24 Teresa Whalen, RPR, FPR  
25 Notary Public, State of Florida  
West Palm Beach Office Job #118991  
Phone: 800.330.6952  
561.659.4155

4

1 ---  
2 I N D E X  
3 ---  
4  
5 WITNESS: DIRECT CROSS REDIRECT RECROSS  
6  
7 LOUELLA RABUYO  
8  
9 BY MR. EDWARDS: 5 190  
10 BY MR. MERMELSTEIN: 135 208  
11 BY MR. HILL: 156  
12 BY MR. CRITTON: 173  
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15 E X H I B I T S  
16 ---  
17  
18 NUMBER DESCRIPTION PAGE  
19 DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS 103  
20 DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK 147  
21 DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH 162  
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1                   **PROCEEDINGS**  
 2                   - - -  
 3           Deposition taken before Teresa Whalen,  
 4   Registered Professional Reporter, Florida  
 5   Professional Reporter, and Notary Public in and for  
 6   the State of Florida at Large, in the above cause.  
 7                   - - -  
 8   Thereupon,  
 9                   (LOUELLA RABUYO)  
 10   having been first duly sworn or affirmed, was examined  
 11   and testified as follows:  
 12           THE WITNESS: I do.  
 13           **DIRECT EXAMINATION**  
 14           MR. EDWARDS: Does anyone want to put on the  
 15   record what case this is being taken in? I noticed  
 16   it in L.M. versus Epstein. I don't know if anybody  
 17   cares to say who your clients are, what the case  
 18   style is or anything else for when she types it up.  
 19           MR. MERMELSTEIN: I don't have a problem with  
 20   that. Are we doing initials?  
 21           MR. EDWARDS: Yeah. Initials.  
 22           MR. MERMELSTEIN: Okay.  
 23   BY MR. EDWARDS:  
 24   Q All right. Will you state your name for the  
 25   record.

6

1   A Louella Rabuyo.  
 2   Q And what's your current address?  
 3   A 904 Summer Street, Lake Worth.  
 4   Q All right. How long have you lived at 904  
 5   Summer Street?  
 6   A About two years.  
 7   Q Two years. Where did you live prior to 904  
 8   Summer Street?  
 9   A In Palm Ridge Apartment, that's in Mango  
 10   Drive.  
 11   Q How long did you live there?  
 12   A About a year.  
 13   Q All right. Where did you live prior to that,  
 14   the Palm Ridge Apartment?  
 15   A In a townhouse in West Palm Beach.  
 16   Q Okay. How long did you live in the townhouse  
 17   in West Palm Beach?  
 18   A Less than a year.  
 19   Q Have you ever lived at Jeffrey Epstein's  
 20   location of 358 El Brillo Way?  
 21   A No, sir.  
 22   Q Where are you currently employed?  
 23   A Mr. Epstein.  
 24   Q And what address do you report to work?  
 25   A 358 El Brillo Way.

7

1   Q How long have you been employed by  
 2   Mr. Epstein?  
 3   A It will be five years this November 17th.  
 4   Q So you started November 17th, 2004?  
 5   A Yes, sir.  
 6   Q And how did you get hired by Mr. Epstein?  
 7   A Through an agency.  
 8   Q What agency?  
 9   A It's Regal Domestics.  
 10   Q And what was your position that you were hired  
 11   by Mr. Epstein for?  
 12   A Housekeeper.  
 13   Q We've taken the deposition of another witness  
 14   in this case, Alfredo Rodriguez. Are you familiar with  
 15   that name?  
 16   A Yes.  
 17   Q And that person, I believe he represented that  
 18   he was also maybe a house manager. Is that correct?  
 19   A Correct.  
 20   Q Would he have been, at some point in time,  
 21   your boss or your superior?  
 22   A Yes.  
 23   Q That's somebody who you answered to,  
 24   Alfredo Rodriguez?  
 25   A (Nodding head). Sometimes --

8

1   ██████████: You have to say yes or no, you  
 2   can't nod your head.  
 3   BY MR. EDWARDS:  
 4   Q Yes?  
 5   A Yes.  
 6   MR. CRITTON: No, no. She said sometimes,  
 7   then you put yes in her mouth.  
 8   MR. EDWARDS: I didn't put anything in her  
 9   mouth. I don't want the record --  
 10   MR. CRITTON: Let me take it back. You said  
 11   yes, but she started to say something before she  
 12   was interrupted.  
 13   BY MR. EDWARDS:  
 14   Q That's fine. You can answer the question,  
 15   then we'll instruct you on the deposition.  
 16   MR. ██████████: Did you want to explain that  
 17   further?  
 18   THE WITNESS: Because we were supposed to work  
 19   together, but he was bossy, he was bossy.  
 20   BY MR. EDWARDS:  
 21   Q Okay. Have you ever had your deposition taken  
 22   before like this?  
 23   A No.  
 24   Q All right. Well, there is one court reporter,  
 25   and it's very easy in casual conversation to nod your



9

1 head or shake your head, and she can't take that down.  
 2 A All right.  
 3 Q It's also very easy to say uh-huh or huh-uh,  
 4 but it kind of looks the same on paper, so you can't do  
 5 that either. I'm going to wait until you finish your  
 6 answer, and you have to wait until I finish my question,  
 7 because if we talk over one another, then the court  
 8 reporter can't get it down.  
 9 A Okay. Yes, sir.  
 10 Q All right. So if you don't understand the  
 11 question, tell me you don't understand and I'll try to  
 12 ask a better question.  
 13 A Yes.  
 14 Q Okay. So you were hired in November of 2004  
 15 to be the housekeeper for Mr. Epstein?  
 16 A Yes.  
 17 Q And when you were hired, who exactly hired  
 18 you, who -- let me strike that.  
 19 When you were hired to be the housekeeper for  
 20 Mr. Epstein, who did you interview with?  
 21 A Ms. Maxwell.  
 22 Q Is that Ghislaine Maxwell or just  
 23 Laine Maxwell?  
 24 A Ghislaine Maxwell.  
 25 Q And where did the interview take place?

10

1 A At 358 El Brillo Way.  
 2 Q And what did Ms. Maxwell and you speak about  
 3 prior to your being hired as the housekeeper?  
 4 A My duties.  
 5 Q And what did she tell you your duties would  
 6 be?  
 7 A To tidy, to make beds, do laundry.  
 8 Q Did she tell you what would take place in the  
 9 house on a day-to-day basis?  
 10 A No.  
 11 Q So going into that position, you had no idea  
 12 who the guests would be or who the people coming in the  
 13 house would be, or what would generally go on?  
 14 A Can you simplify the question?  
 15 Q Sure. When you talked about with  
 16 Ghislaine Maxwell at this interview, your duties being  
 17 you would make the bed and tidy up, did she also tell  
 18 you that there would be a lot of guests, there would be  
 19 a few guests, did she talk to you about that at all?  
 20 A She mentioned that if there are guests, we  
 21 have to, like, you know, prepare the room, and, what's  
 22 this, attend to the guests.  
 23 Q And what did you understand that to mean that  
 24 you have to attend to the guests?  
 25 A You have to prepare the room and see to it

11

1 that it's clean and appropriately, what's this...  
 2 Q And as I understand this property, there is a  
 3 main house and then there's also a staff house on the  
 4 property; is that right?  
 5 A Yes, sir.  
 6 Q And when the guests would come over, would you  
 7 stay in the main house, or would you go to the staff  
 8 house?  
 9 MR. [REDACTED]: Can we get a time frame to the  
 10 question?  
 11 BY MR. EDWARDS:  
 12 Q Over the last five years while you worked  
 13 there.  
 14 A I usually stay in the staff house and do the  
 15 laundry, then I go to the kitchen and then tidy the  
 16 kitchen.  
 17 Q You were hired in November of 2004, and what  
 18 were your hours that you worked there back in November  
 19 of 2004 when you were hired?  
 20 A Eight to five.  
 21 Q How many days a week?  
 22 A Depends.  
 23 Q How would the schedule be relayed to you?  
 24 A When Mr. Epstein is there, then I'm supposed  
 25 to report, but usually it's five days a week.

12

1 Q So am I correct in understanding that there  
 2 was one schedule when Mr. Epstein was in town, and the  
 3 schedule may be a little bit different if Mr. Epstein  
 4 was out of town?  
 5 A Yes, sir.  
 6 Q All right. Tell me the differences when  
 7 Mr. Epstein is in town versus when Mr. Epstein was not  
 8 in town.  
 9 A If he stays like three or four days, then I'm  
 10 supposed to be there, and then the house is to be  
 11 cleaned. And then when they do not come, then I can  
 12 either go there, or I'm given free days off.  
 13 Q Three days off?  
 14 A No. A free day.  
 15 Q Oh, okay. But typically back in 2004 when you  
 16 were hired, you worked an average of about five days a  
 17 week; is that correct?  
 18 A Yes.  
 19 Q All right. And I guess by the way that you're  
 20 explaining it, if Mr. Epstein was in town for a longer  
 21 period of time, you may work more than five days, and if  
 22 Mr. Epstein was not in town, you may work less than five  
 23 days?  
 24 A Yes.  
 25 Q Okay. Did you ever talk to Mr. Epstein prior



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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: center;">13</p> <p>1 to being hired?</p> <p>2 A No, sir.</p> <p>3 Q Where did this meeting, within the house where</p> <p>4 did the meeting with Ghislaine Maxwell take place?</p> <p>5 A In the living room.</p> <p>6 Q Aside from telling you that you were going to</p> <p>7 be required to make the beds and just generally tidy up,</p> <p>8 did she specify anything else that you would be required</p> <p>9 to do?</p> <p>10 A No.</p> <p>11 Q Where had you worked prior to working for</p> <p>12 Mr. Epstein?</p> <p>13 A I work as a certified nursing assistant.</p> <p>14 Q Where?</p> <p>15 A At that time I was doing private duty.</p> <p>16 Q How long have you been a certified nursing</p> <p>17 assistant?</p> <p>18 A Since about ten years.</p> <p>19 Q And what made you change professions from</p> <p>20 being a certified nursing assistant to be a housekeeper</p> <p>21 for Mr. Epstein?</p> <p>22 A The agency called me that there is an</p> <p>23 interview; if I like, I go to, so that's how it started.</p> <p>24 Q And when you went to the interview, obviously</p> <p>25 you're going to this very big house and you talked to</p> | <p style="text-align: center;">15</p> <p>1 Q Did she tell what you would be paid at that</p> <p>2 time?</p> <p>3 A Not yet.</p> <p>4 Q Did you show up that Saturday? I guess that's</p> <p>5 November 17th of 2004?</p> <p>6 A No, that's not.</p> <p>7 Q No. Was it prior to November 17th of 2004, or</p> <p>8 after?</p> <p>9 A After.</p> <p>10 Q Okay. The interview that you first went to</p> <p>11 was November 17th, 2004 with Ms. Maxwell; is that the</p> <p>12 date that you gave us?</p> <p>13 A I cannot remember.</p> <p>14 Q The only reason I'm using that date is I</p> <p>15 believe the question I asked was when did you start</p> <p>16 working for Mr. Epstein, and I thought the date that you</p> <p>17 gave me was November 17th, 2004.</p> <p>18 A Yes.</p> <p>19 Q Okay. And in the course of this whole thing,</p> <p>20 it sounds like you interviewed with Ghislaine Maxwell,</p> <p>21 there were other interviewees, you received a call and</p> <p>22 you were asked to try out on a Saturday?</p> <p>23 A Yes.</p> <p>24 Q And where does that Saturday fall in related</p> <p>25 to November 17th, 2004?</p> |
| <p style="text-align: center;">14</p> <p>1 Ghislaine Maxwell, right?</p> <p>2 A Yes.</p> <p>3 Q And did you decide right then that you liked</p> <p>4 this and that you were going to change professions and</p> <p>5 you were going to be his housekeeper?</p> <p>6 A No.</p> <p>7 Q Okay. Then walk me through that, how did you</p> <p>8 go about eventually accepting the position?</p> <p>9 A I didn't expect to be hired, because there</p> <p>10 were other interviewers (sic), interview people that</p> <p>11 were to be interviewed.</p> <p>12 Q Okay.</p> <p>13 A And then I receive a call from Ms. Maxwell if</p> <p>14 I like, I can do a try-out.</p> <p>15 Q Okay. Did she tell you how long this try-out</p> <p>16 period would last?</p> <p>17 A No.</p> <p>18 Q And what did you tell her when she made that</p> <p>19 offer for you to try out?</p> <p>20 A I told her that I am still taking care of this</p> <p>21 patient, so she said if you like, you can come Saturday</p> <p>22 and try it.</p> <p>23 Q Okay. And what did you tell her, did you</p> <p>24 accept that?</p> <p>25 A Yes, I did.</p>                                                                | <p style="text-align: center;">16</p> <p>1 A When I accepted the job offer.</p> <p>2 Q Okay. And did they tell you at that time when</p> <p>3 you accepted the job offer how much you were going to be</p> <p>4 paid?</p> <p>5 A Yes.</p> <p>6 Q What was that?</p> <p>7 A It was 32,000 per annum.</p> <p>8 Q And has your salary increased over time?</p> <p>9 A Yes, sir.</p> <p>10 Q And can you walk us through the increments of</p> <p>11 increase in your salary?</p> <p>12 A It was promised yearly increase.</p> <p>13 Q By whom?</p> <p>14 A Ms. Maxwell.</p> <p>15 Q Was that at the time when you were</p> <p>16 interviewed, or took the job?</p> <p>17 A Yes, sir.</p> <p>18 Q Did she promise you what your yearly increase</p> <p>19 would be?</p> <p>20 A No.</p> <p>21 Q And have you received a yearly increase every</p> <p>22 year?</p> <p>23 A I did.</p> <p>24 Q And what has that yearly increase been?</p> <p>25 A Up to 42.</p>                                                                                                                                                                                        |



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17

1 Q Today?

2 A Yes.

3 Q So you're making \$42,000 today, and that's the

4 most that you've made over the five-year period you've

5 worked for Mr. Epstein?

6 A Yes, sir.

7 Q At the time when you -- when we took

8 Alfredo Rodriguez's deposition, he described you as a

9 very religious Catholic woman. Does that accurately

10 describe you?

11 MR. CRITTON: Let me just object to the form.

12 MR. [REDACTED]: You can answer the question if

13 you understood it.

14 THE WITNESS: I am a Catholic and I go to

15 mass.

16 BY MR. EDWARDS:

17 Q Is that something you go to regularly?

18 A If I have time, I go regularly.

19 Q When do you normally go to mass?

20 A Sunday masses and weekdays.

21 Q How many weekdays?

22 A If I can, every day.

23 Q And in the five-year period that you've worked

24 for Mr. Epstein, have you tried to go every day if you

25 could?

18

1 A No.

2 Q In a typical week would you normally go on

3 Sunday to mass?

4 A Yes, sir.

5 Q And how many days during the week will you

6 also attend mass?

7 A If the schedule permits, then I go, but if

8 not, then I don't go.

9 Q So is there a way that you could give me an

10 average of how many times a week that you go during the

11 week to mass?

12 A This time?

13 Q Right. Yeah. I guess today, these days.

14 A I attend Sunday masses only.

15 Q And back in 2004, when you first started with

16 Mr. Epstein?

17 A I tried to go if I have the time, sir.

18 Q Was there ever a time that you went every day?

19 A No.

20 Q But your testimony is that if time permitted,

21 you tried to go every day?

22 A Yes.

23 Q Is there a reason why now these days you only

24 attend on Sundays?

25 A Because my time schedule has changed.

19

1 Q Okay. So let's talk about that. Back in

2 November of 2004, you were to working 8:00 a.m. to

3 5:00 p.m. And when did that schedule change from 8:00

4 5:00?

5 A When? When the house was renovated.

6 Q When was that, do you remember the year?

7 A 2006.

8 Q Okay.

9 MR. CRITTON: I'm sorry. '06?

10 THE WITNESS: '06.

11 BY MR. EDWARDS:

12 Q So from November 2004 through '06, I'm correct

13 in presuming that your schedule was an average of five

14 days a week from 8:00 a.m. to 5:00 p.m.?

15 A At that time I go nine o'clock, I go to the

16 house at nine o'clock.

17 Q Starting in 2006?

18 A Yes.

19 Q So when your schedule changed from 8:00 to

20 5:00, in 2006 you started going to the house,

21 Jeffrey Epstein's house, at nine o'clock?

22 A Yes, sir.

23 Q And you would stay until what time?

24 A Sometimes 5:00, sometimes later, 5:30.

25 Q Would that depend on what needed to be done?

20

1 A Yes.

2 Q How have you received your money, has it been

3 by check, by cash, in terms of payment from Mr. Epstein?

4 A It's directly deposited to my bank.

5 Q Do you know who directly deposits your money?

6 A Who?

7 Q Yeah. Whether it's Ghislaine Maxwell or a

8 corporation or Jeffrey Epstein, do you know who the

9 direct depositor is of your check?

10 MR. CRITTON: Form.

11 THE WITNESS: Mr. Epstein.

12 BY MR. EDWARDS:

13 Q Okay. Over the five years that you have been

14 working at Mr. Epstein's house, how many conversations

15 have you had directly with Mr. Epstein?

16 A What's this, what year?

17 Q Well, in the last five years, how many

18 conversations have you had directly with Mr. Epstein?

19 MR. CRITTON: Form.

20 THE WITNESS: The past year it's just good

21 morning, how are you, you're doing a good job.

22 BY MR. EDWARDS:

23 Q Okay. How was it prior to that, did you talk

24 to him more?

25 A This time more.



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21

1 Q Now you talk to him more?  
 2 A Because I serve him breakfast, so...  
 3 Q And is that an additional responsibility that  
 4 you didn't have before?  
 5 A Yes.  
 6 Q In the five-year period that you've worked  
 7 there, can you name for me all of the other employees  
 8 who have worked at the Jeffrey Epstein house?  
 9 A After Alfredo Rodriguez left, there was  
 10 Jerome, the gardener, and now it's Janusz.  
 11 Q And those are the house managers?  
 12 A Yes.  
 13 Q And then you work there?  
 14 A Right.  
 15 Q Aside from yourself, Jerome, and Janusz, was  
 16 there anybody else that you can remember working at the  
 17 house in the past five years in any position?  
 18 A Yes.  
 19 Q Who else?  
 20 [REDACTED]  
 21 [REDACTED]?  
 22 A Yes.  
 23 Q What does she do there?  
 24 A She's the personal assistant.  
 25 Q Personal assistant to whom?

22

1 A Mr. Epstein.  
 2 Q And as his personal assistant, what have you  
 3 observed her to do for him?  
 4 A Can you rephrase your question?  
 5 Q I can try. You said that she's his personal  
 6 assistant. What does that mean, what does she do?  
 7 A Order things that I need, or, what's this.  
 8 Q So it's your testimony that [REDACTED] has  
 9 been, for the past five years that you've worked there,  
 10 has been somebody that you have observed to order things  
 11 that you need?  
 12 A If I need something, then I go to ask [REDACTED].  
 13 Q Okay. What other things have you seen  
 14 [REDACTED] do for Mr. Epstein?  
 15 A I have not, that's the only thing I know.  
 16 Q Who told you that [REDACTED] is  
 17 Mr. Epstein's personal assistant?  
 18 A Coworker.  
 19 Q Who is that?  
 20 A In New York.  
 21 Q What's that person's name?  
 22 A Lyn.  
 23 Q Lyn who?  
 24 A Fontanilla.  
 25 Q Is that Jojo's wife?

23

1 A Yes.  
 2 Q When did you talk to Lyn Fontanilla about  
 3 [REDACTED]?  
 4 A It was just through the conversation.  
 5 Q What would cause you to be in a conversation  
 6 with this person in New York?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: She calls me, I call her.  
 9 BY MR. EDWARDS:  
 10 Q You're friends?  
 11 A Yes.  
 12 Q Do you still talk to her today?  
 13 A Yes.  
 14 Q And does she work for Mr. Epstein as well, to  
 15 your knowledge?  
 16 A She does.  
 17 Q And does Jojo, her husband, also work for  
 18 Mr. Epstein as well?  
 19 A Yes, sir.  
 20 Q Where do they work?  
 21 A In New York.  
 22 Q At Mr. Epstein's house in New York?  
 23 A Yes, sir.  
 24 Q And have you talked with them about your  
 25 duties and has she talked to you about her duties?

24

1 A Yes, sir.  
 2 Q And your duties are similar to Lyn's duties in  
 3 New York?  
 4 A No. Because that's a bigger house than...  
 5 Q Palm Beach?  
 6 A Yes, sir.  
 7 Q Is it your understanding that -- you know,  
 8 we're going to get into the past two years where  
 9 Mr. Epstein has either been in jail or he's been on  
 10 house arrest in Palm Beach, so I'm going to ask you  
 11 first for the first three years that you worked there  
 12 and Mr. Epstein was traveling, was Mr. Epstein spending  
 13 the majority of his time in Palm Beach or in New York or  
 14 elsewhere, if you know?  
 15 A He comes -- we don't know the schedule, we  
 16 receive a call, then we prepare, he's coming.  
 17 Q You say we receive a call. Who receives the  
 18 call?  
 19 A Either Alfredo or Janusz.  
 20 Q Depending on who the house manager is at the  
 21 time?  
 22 A Yes.  
 23 Q And the call comes from whom, from Ghislaine  
 24 or from Jeffrey Epstein?  
 25 A I don't know.



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| <p style="text-align: center;">25</p> <p>1 Q Okay. What's your understanding of Lyn's role<br/>2 in Jeffrey Epstein's life up in New York?<br/>3 A She's housekeeper, too.<br/>4 Q And your understanding of Jojo's role?<br/>5 A A driver.<br/>6 Q Does he also serve as a house manager, similar<br/>7 to the way Alfredo Rodriguez was in Palm Beach?<br/>8 A No.<br/>9 Q When you say a driver, who does he drive, if<br/>10 you know?<br/>11 A Mr. Epstein.<br/>12 Q All right. Mr. Epstein obviously hasn't been<br/>13 in New York for quite some time; isn't that your<br/>14 understanding?<br/>15 A Yes.<br/>16 Q So Jojo's still employed up in New York as a<br/>17 driver for Mr. Epstein, right?<br/>18 A He also does housework, helps Lyn.<br/>19 Q Have you discussed with Lyn whether or not<br/>20 young girls visit the house in New York?<br/>21 MR. CRITTON: Form.<br/>22 MR. [REDACTED]: You can answer that.<br/>23 BY MR. EDWARDS:<br/>24 Q He didn't like the form of my question so he's<br/>25 able to object, but you can still answer.</p> | <p style="text-align: center;">27</p> <p>1 MR. CRITTON: Form.<br/>2 BY MR. EDWARDS:<br/>3 Q You realize that?<br/>4 MR. [REDACTED]: Do you understand his question?<br/>5 BY MR. EDWARDS:<br/>6 Q Do you understand my question?<br/>7 MR. [REDACTED]: Do you know that is what he's<br/>8 asking you?<br/>9 THE WITNESS: Yes.<br/>10 MR. [REDACTED]: I think the question was do you<br/>11 know whether or not Mr. Epstein pled guilty to<br/>12 crimes.<br/>13 Was that the question?<br/>14 MR. EDWARDS: Sure.<br/>15 MR. CRITTON: That was not his question.<br/>16 BY MR. EDWARDS:<br/>17 Q Okay. Well, do you realize that Mr. Epstein<br/>18 pled guilty to crimes?<br/>19 A Plead guilty? From the news.<br/>20 Q Okay. So when you say you saw the news, which<br/>21 is where this portion of our discussion began, are you<br/>22 referring to the news related to Mr. Epstein and the<br/>23 charges, the criminal charges or criminal investigation<br/>24 surrounding him; is that the news you're talking about?<br/>25 A Yes.</p> |
| <p style="text-align: center;">26</p> <p>1 MR. [REDACTED]: You can still answer if you<br/>2 understand the question.<br/>3 THE WITNESS: No.<br/>4 BY MR. EDWARDS:<br/>5 Q You've never talked to Lyn about young girls<br/>6 being in the house in New York?<br/>7 A When the news came up, so that's how we<br/>8 talked.<br/>9 Q What do you mean, when the news came up?<br/>10 A Whenever there was something on the news on<br/>11 TV, then that's how we come to talk about it.<br/>12 Q Okay. When you say something came on the<br/>13 news, you're talking about in terms of a criminal<br/>14 investigation of Mr. Epstein?<br/>15 MR. CRITTON: Form.<br/>16 THE WITNESS: Criminal?<br/>17 BY MR. EDWARDS:<br/>18 Q Well, you realize that Mr. Epstein went to<br/>19 jail, right?<br/>20 A Yes.<br/>21 Q And that was after pleading guilty to some<br/>22 crimes. You realize that, right?<br/>23 MR. CRITTON: Form.<br/>24 BY MR. EDWARDS:<br/>25 Q I mean, that's why you go to jail.</p>                                                                 | <p style="text-align: center;">28</p> <p>1 Q Okay. So when that came out are we talking<br/>2 about 2005, 2006, something in that area?<br/>3 MR. CRITTON: Form.<br/>4 BY MR. EDWARDS:<br/>5 Q Is that the first time you remember seeing the<br/>6 news on that subject?<br/>7 MR. CRITTON: Form.<br/>8 THE WITNESS: I cannot remember.<br/>9 BY MR. EDWARDS:<br/>10 Q All right. Whenever it was, you talked to Lyn<br/>11 about that?<br/>12 A No. I don't usually talk about it. She calls<br/>13 and how are you doing, then oh, like that.<br/>14 Q Okay. And what was the discussion as it<br/>15 related to girls in either the New York house or the<br/>16 Palm Beach house between yourself and Lyn?<br/>17 MR. CRITTON: Form.<br/>18 THE WITNESS: She talks to me when she read in<br/>19 the news or she saw on the computer.<br/>20 BY MR. EDWARDS:<br/>21 Q Okay. And does she tell you about young girls<br/>22 being in the New York house?<br/>23 MR. CRITTON: Form.<br/>24 THE WITNESS: She did not.<br/>25</p>                 |



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1 BY MR. EDWARDS:  
 2 Q Okay. Have you talked to Jojo about that?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: No.  
 5 BY MR. EDWARDS:  
 6 Q In working there for five years, at least the  
 7 time period prior to Mr. Epstein going to jail, while  
 8 you were there you recognized a lot of young girls in  
 9 the house, right?  
 10 MR. CRITTON: Form, predicate.  
 11 THE WITNESS: Young girls?  
 12 BY MR. EDWARDS:  
 13 Q Are you asking --  
 14 A They are females.  
 15 Q Where did the females come from, did you know?  
 16 A I don't know.  
 17 Q Do you know why they were at the house?  
 18 A For massage.  
 19 MR. CRITTON: Form.  
 20 BY MR. EDWARDS:  
 21 Q When is the first time that you heard about  
 22 females coming to Mr. Epstein's house for massages?  
 23 A Maybe two weeks after I started working.  
 24 Q All right. So if you started November 17th of  
 25 2004, then sometime around early December of 2004, you

30

1 heard about young girls or girls coming to Mr. Epstein's  
 2 house for the purposes of giving him a massage?  
 3 MR. CRITTON: Form.  
 4 BY MR. EDWARDS:  
 5 Q Is that right?  
 6 A Young girls? They're females, and I was told  
 7 they come to do massages.  
 8 Q Who told you that?  
 9 A Alfredo.  
 10 Q Alfredo told you that the girls did massages?  
 11 A He told me when I started there that there are  
 12 massages to be done, and then that's when I heard it  
 13 first from him.  
 14 Q And then did you witness the girls come over  
 15 that you were told were there to give massages?  
 16 MR. CRITTON: Form. That she actually saw, is  
 17 that what you're -- let me just object to the form.  
 18 MR. EDWARDS: I said the word saw, so I mean,  
 19 there's no, like, mixing words there. Yes, that  
 20 she actually saw.  
 21 MR. CRITTON: There's a distinction between  
 22 seeing the girls coming and seeing the massages.  
 23 BY MR. EDWARDS:  
 24 Q Did you see the girls come to the house?  
 25 A Sometimes.

31

1 Q All right. And when is the first time that  
 2 you saw these girls come to the house? And by "these  
 3 girls," I'm talking about the girls that you were told  
 4 were there to give massages.  
 5 MR. CRITTON: Form.  
 6 THE WITNESS: I cannot remember specifically  
 7 the day and the time.  
 8 BY MR. EDWARDS:  
 9 Q These massages take place every day that  
 10 Mr. Epstein's in town, right?  
 11 MR. CRITTON: Form, leading.  
 12 THE WITNESS: Not always.  
 13 BY MR. EDWARDS:  
 14 Q Okay. So if the testimony in this case by  
 15 other witnesses has been that Mr. Epstein has these  
 16 girls over at his house to give him a massage every day,  
 17 then you would disagree with that testimony?  
 18 MR. CRITTON: Form, improper question.  
 19 THE WITNESS: Because there are times that I'm  
 20 not there in the house.  
 21 BY MR. EDWARDS:  
 22 Q Okay. Every day that you are there in the  
 23 house and Mr. Epstein is also there, girls come over to  
 24 his house to give him massages, as you understand it?  
 25 MR. CRITTON: Form, leading.

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1 BY MR. EDWARDS:  
 2 Q Is that a fair statement?  
 3 MR. CRITTON: Form, leading.  
 4 MR. [REDACTED]: Also can we get a time frame?  
 5 You mean now, or prior?  
 6 BY MR. EDWARDS:  
 7 Q Between 2004 and the time that Mr. Epstein  
 8 went to jail in 2008.  
 9 MR. CRITTON: Same objection.  
 10 MR. [REDACTED]: Do you understand the question?  
 11 THE WITNESS: No.  
 12 BY MR. EDWARDS:  
 13 Q Okay. Between 2004 and the time that  
 14 Mr. Epstein went to jail in 2008, on occasions where you  
 15 were in the house and Mr. Epstein was in town, is it a  
 16 fair statement that girls came over to give him a  
 17 massage every day?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: Between what year again?  
 20 BY MR. EDWARDS:  
 21 Q When you started working and the time when  
 22 Mr. Epstein went to jail.  
 23 MR. CRITTON: Same objection.  
 24 THE WITNESS: Yes.  
 25



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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: center;">33</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q All right. And when you were in the house and</p> <p>3 Mr. Epstein was also in town, would there be usually one</p> <p>4 massage per day, or two massages, or more?</p> <p>5 A Maybe three.</p> <p>6 Q Okay. So on a typical day when you were in</p> <p>7 town, you were in the house and Mr. Epstein was in town,</p> <p>8 it's your testimony that he would have an average of</p> <p>9 three massages a day?</p> <p>10 A Not average. I'm -- I want to correct that.</p> <p>11 Q Correct it, please.</p> <p>12 A What's this, average? Can you...</p> <p>13 Q Okay. I think I see what you're saying.</p> <p>14 Some days there would be two and some days</p> <p>15 there would be three, and you don't want to commit to an</p> <p>16 average?</p> <p>17 A Yes. Because sometimes I'm not aware, I'm in</p> <p>18 the staff house.</p> <p>19 Q Okay. All right. I understand what you're</p> <p>20 saying.</p> <p>21 But the days when you are in the house and</p> <p>22 Mr. Epstein is there, you see days when there are two</p> <p>23 massages per day and some days when there are three</p> <p>24 massages per day?</p> <p>25 A Yes.</p> | <p style="text-align: center;">35</p> <p>1 what's this, to their appearances or to their what their</p> <p>2 attire is.</p> <p>3 Q All right. Haven't you made a comment to</p> <p>4 Alfredo Rodriguez in the past that these girls that are</p> <p>5 coming over to give massages are too young?</p> <p>6 MR. CRITTON: Form.</p> <p>7 THE WITNESS: I cannot remember.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q Isn't that something that you have believed?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: What you mean, believe?</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q Isn't that something that you have thought in</p> <p>14 your head, these girls that are coming over to the house</p> <p>15 that are supposedly giving Mr. Epstein massage are too</p> <p>16 young?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: At my age, these people are</p> <p>19 young to me, so...</p> <p>20 I'm past sixty, so they are young.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q Well, haven't you also made the statement to</p> <p>23 Mr. -- we'll come back to that statement.</p> <p>24 When these girls would come in the house, you</p> <p>25 said sometimes you would answer the door, right?</p> |
| <p style="text-align: center;">34</p> <p>1 Q All right. And these people that are coming</p> <p>2 over that you were told by Alfredo Rodriguez are there</p> <p>3 to give Mr. Epstein a massage, isn't it typical that</p> <p>4 they would arrive by taxicab?</p> <p>5 MR. CRITTON: Form, leading.</p> <p>6 THE WITNESS: I did not know about that.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q Do you know how any of these -- one more</p> <p>9 question before I ask the next one.</p> <p>10 Are they always female masseuses?</p> <p>11 A Yes.</p> <p>12 Q And are you aware of how these female</p> <p>13 masseuses would arrive to Mr. Epstein's house between</p> <p>14 the time you started working and the time he went to</p> <p>15 jail?</p> <p>16 A No. Because I'm inside the house.</p> <p>17 Q Okay. Can you describe these females for us?</p> <p>18 MR. CRITTON: Form.</p> <p>19 THE WITNESS: I don't pay attention to their,</p> <p>20 what's this, because I just do my job, open the</p> <p>21 door if I'm -- what's this, I hear the doorbell</p> <p>22 rang.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q Okay.</p> <p>25 A So I don't, like, really pay attention to,</p>                                          | <p style="text-align: center;">36</p> <p>1 MR. CRITTON: Form.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q And you would see these --</p> <p>4 MR. CRITTON: Wait. Can I just...</p> <p>5 If you use the word "female," I'm not going to</p> <p>6 object to most of your questions, as opposed to</p> <p>7 "girls," because I don't know what you mean by</p> <p>8 that. So I'm going to keep objecting.</p> <p>9 Whatever you want, I just...</p> <p>10 MR. EDWARDS: Yeah, I know. I'm just talking</p> <p>11 about the girls that would come over to give</p> <p>12 massages.</p> <p>13 MR. CRITTON: If you want to call them</p> <p>14 females, I have no objection. If you call them</p> <p>15 girls, I don't know what that means. Females, I</p> <p>16 do.</p> <p>17 MR. EDWARDS: Okay.</p> <p>18 MR. CRITTON: I'm not telling you how to do</p> <p>19 it, I'm just telling you --</p> <p>20 MR. EDWARDS: No, no. I appreciate it.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q The females that would come over to give</p> <p>23 massages, often times you would answer the door when the</p> <p>24 door rang?</p> <p>25 A Sometimes.</p>                                                                     |



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1 Q Okay. And sometimes who else would answer the  
 2 door?  
 3 A Alfredo.  
 4 Q And what door would the females enter through?  
 5 A The kitchen door.  
 6 Q And is that the door that other guests would  
 7 also enter through?  
 8 A Sometimes.  
 9 Q Why was that door chosen as the door for the  
 10 female masseuses to enter through, do you know?  
 11 A No, I don't.  
 12 Q What would happen, what would be the next step  
 13 as these females would enter through the kitchen door?  
 14 A I don't know, because I just let them and then  
 15 go finish my work.  
 16 Q Okay. And then would their next contact be  
 17 with [REDACTED]?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: If I see [REDACTED], then yes. But I  
 20 just let them stay in the kitchen and then go to  
 21 the staff house and continue the laundry.  
 22 BY MR. EDWARDS:  
 23 Q Isn't it your understanding that these females  
 24 were on a schedule as to when to come over to give  
 25 Mr. Epstein a massage?

38

1 MR. CRITTON: Form.  
 2 THE WITNESS: No, I don't know.  
 3 BY MR. EDWARDS:  
 4 Q Okay. Well, each time that the girls would  
 5 come over to give Mr. Epstein a massage, he would be up  
 6 in his master bedroom already; is that correct?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: I don't know.  
 9 BY MR. EDWARDS:  
 10 Q In the period of time between 2004 when you  
 11 started working and when Mr. Epstein went to jail, can  
 12 you approximate or estimate the number of these females  
 13 that would come over to Mr. Epstein's house to allegedly  
 14 give him a massage?  
 15 A No.  
 16 Q Are we talking more than fifty, more than a  
 17 hundred?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: I did not count.  
 20 BY MR. EDWARDS:  
 21 Q But there were many different girls, right?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: Many females.  
 24 BY MR. EDWARDS:  
 25 Q It was not like there were only ten females

39

1 that rotated, we're talking about fifty, a hundred, two  
 2 hundred different females that you saw?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: I did not count.  
 5 BY MR. EDWARDS:  
 6 Q You saw a lot of different female faces that  
 7 were supposedly there to give him a massage, right?  
 8 MR. CRITTON: Form, leading.  
 9 THE WITNESS: Sometimes the same female comes  
 10 back, so...  
 11 BY MR. EDWARDS:  
 12 Q And other times it would be different females?  
 13 A Yes.  
 14 Q All right. And can you approximate the age of  
 15 these females that would come over to the house?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: I did not ask their age.  
 18 BY MR. EDWARDS:  
 19 Q You saw their face and you saw their  
 20 appearance. Would you be surprised if some of these  
 21 females were thirteen years old?  
 22 MR. CRITTON: Form. You're asking her to  
 23 speculate and guess.  
 24 THE WITNESS: I did not see any thirteen years  
 25 old.

40

1 BY MR. EDWARDS:  
 2 Q Okay. Would you be surprised if some of these  
 3 girls were fourteen years old?  
 4 MR. CRITTON: Same objection.  
 5 THE WITNESS: Fourteen? I don't know.  
 6 BY MR. EDWARDS:  
 7 Q Could they have been fifteen years old?  
 8 MR. CRITTON: Same objection.  
 9 THE WITNESS: Maybe more than that.  
 10 BY MR. EDWARDS:  
 11 Q Maybe more than that?  
 12 A Yeah.  
 13 Q But maybe less than that?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: I don't know.  
 16 BY MR. EDWARDS:  
 17 Q The truth is, you don't know how old these  
 18 females were, but these females that were there to give  
 19 him a massage were young, in your mind?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: Some look young, but then they,  
 22 what's this?  
 23 BY MR. EDWARDS:  
 24 Q You knew that something that was going on  
 25 there was not right, isn't that true?



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| <p style="text-align: center;">41</p> <p>1 MR. CRITTON: Form, argumentative.<br/>                 2 MR. EDWARDS: Jack, we're catching some music<br/>                 3 coming over.<br/>                 4 (Brief recess in proceedings.)<br/>                 5 BY MR. EDWARDS:<br/>                 6 Q As you saw these young females coming over to<br/>                 7 Mr. Epstein's house to give him a massage, you knew in<br/>                 8 your heart of hearts that something was wrong?<br/>                 9 MR. CRITTON: Form, argumentative.<br/>                 10 THE WITNESS: I was told that they're going to<br/>                 11 do a massage.<br/>                 12 BY MR. EDWARDS:<br/>                 13 Q I realize you were told that. Okay. Isn't it<br/>                 14 true that each of these girls was then led upstairs to<br/>                 15 Mr. Epstein's bedroom; that was the routine, right?<br/>                 16 MR. CRITTON: Form, predicate.<br/>                 17 THE WITNESS: I don't know. When I'm there,<br/>                 18 then I -- most of the time I just go to the, what's<br/>                 19 this, to the staff house.<br/>                 20 BY MR. EDWARDS:<br/>                 21 Q When the girls would arrive -- when the<br/>                 22 females would arrive, you would go to the staff house?<br/>                 23 MR. CRITTON: Form.<br/>                 24 THE WITNESS: First sometimes I would offer<br/>                 25 them drinks, and then, what's this.</p> | <p style="text-align: center;">43</p> <p>1 THE WITNESS: I did not find any sex toys.<br/>                 2 BY MR. EDWARDS:<br/>                 3 Q You never, in your employment with<br/>                 4 Mr. Epstein, found sex toys in the room after these<br/>                 5 females left from giving him a massage?<br/>                 6 A There was only this, like I thought it was for<br/>                 7 massage. That's it, that's what I saw.<br/>                 8 Q Okay. Have you ever -- are you familiar with<br/>                 9 the armoire that is in Mr. Epstein's room, bedroom?<br/>                 10 A Yes.<br/>                 11 Q And have you ever put items away in that<br/>                 12 armoire?<br/>                 13 A No, sir.<br/>                 14 Q If Alfredo Rodriguez testified that you and he<br/>                 15 had a conversation about the sex toys in Mr. Epstein's<br/>                 16 bedroom and your comment being it's not right --<br/>                 17 A No, sir.<br/>                 18 Q That's not something you would agree with?<br/>                 19 A We did not converse about sex toys.<br/>                 20 Q Have you talked to Mr. Epstein today about you<br/>                 21 having your deposition today?<br/>                 22 A No, sir.<br/>                 23 Q And this is your attorney who is here next to<br/>                 24 you?<br/>                 25 A Yes, sir.</p>                              |
| <p style="text-align: center;">42</p> <p>1 BY MR. EDWARDS:<br/>                 2 Q All right. So did you talk to some of these<br/>                 3 females?<br/>                 4 A No. Just like you care for water or some<br/>                 5 drinks, soda or something.<br/>                 6 Q All right. Did you ever discuss religion with<br/>                 7 any of these females?<br/>                 8 A No, sir.<br/>                 9 Q When these females would go upstairs, how long<br/>                 10 would each typically stay upstairs with Mr. Epstein?<br/>                 11 MR. CRITTON: Form, predicate.<br/>                 12 THE WITNESS: I don't know, but I was told by<br/>                 13 Alfredo that it would take one hour.<br/>                 14 BY MR. EDWARDS:<br/>                 15 Q All right. And when the females would leave,<br/>                 16 wasn't one of your responsibilities to clean the room<br/>                 17 where the massage took place?<br/>                 18 A Yes, sir, to tidy.<br/>                 19 Q To tidy?<br/>                 20 MR. CRITTON: Form.<br/>                 21 BY MR. EDWARDS:<br/>                 22 Q And in doing so, isn't it true that many times<br/>                 23 after these females left, you found vibrators and sex<br/>                 24 toys scattered on the floor and in the room?<br/>                 25 MR. CRITTON: Form.</p>                                                                                                   | <p style="text-align: center;">44</p> <p>1 Q And is that somebody that you paid to be your<br/>                 2 attorney?<br/>                 3 A No, sir.<br/>                 4 Q That's somebody that Mr. Epstein has paid to<br/>                 5 be your attorney?<br/>                 6 A Yes.<br/>                 7 Q When you were hired, did you sign any<br/>                 8 agreement of confidentiality that you wouldn't talk<br/>                 9 about the matters that happened within the house?<br/>                 10 A Yes, sir.<br/>                 11 Q When did you sign that agreement?<br/>                 12 A When I received papers to sign for like my<br/>                 13 evaluation, all the forms needed for employment, like<br/>                 14 tax forms.<br/>                 15 Q Okay. And do you have a copy of that<br/>                 16 agreement?<br/>                 17 A Maybe in my house.<br/>                 18 Q That's something that you think was provided<br/>                 19 to you, or was the only copy kept with Mr. Epstein or<br/>                 20 Ms. Maxwell?<br/>                 21 A We were given duplicate, duplicate copy.<br/>                 22 Q Well, let me tell you that I represent three<br/>                 23 girls that in this case are L.M., E.W., and Jane Doe,<br/>                 24 who were three of the girls that you and I have been<br/>                 25 talking about as females that went to Mr. Epstein's</p> |



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| <p style="text-align: center;">45</p> <p>1 house to give him massages. Okay. Would it surprise<br/>2 you to know that when they went to his house they were<br/>3 as young as thirteen, fourteen, and fifteen years old?<br/>4 MR. CRITTON: Form.<br/>5 THE WITNESS: I didn't know, sir.<br/>6 MR. CRITTON: Asked and answered.<br/>7 BY MR. EDWARDS:<br/>8 Q Would it surprise you to know that once inside<br/>9 his bedroom, he instructed them each to get naked?<br/>10 A I did not.<br/>11 MR. CRITTON: Let me just object to the form.<br/>12 You're asking her to speculate on something she<br/>13 knows nothing about. It serves no purpose. It's a<br/>14 great argument, but it serves no purpose.<br/>15 MR. EDWARDS: I know you're not happy with the<br/>16 line of questioning, you do this every time in<br/>17 deposition.<br/>18 MR. CRITTON: But it serves no purpose, it's<br/>19 never going to be admissible whether she's<br/>20 surprised or not. It's like saying, you know,<br/>21 would it -- well, never mind.<br/>22 You know, would it surprise you that the<br/>23 Afghan election --<br/>24 MR. EDWARDS: Are you trying to make this line<br/>25 of questioning go on longer?</p> | <p style="text-align: center;">47</p> <p>1 years old?<br/>2 MR. CRITTON: Form.<br/>3 THE WITNESS: I do not know about that.<br/>4 BY MR. EDWARDS:<br/>5 Q Okay. And after this line of questioning<br/>6 related to things that happened in Mr. Epstein's bedroom<br/>7 that were actually not massages at all, does this help<br/>8 to refresh your recollection as to the sexual toys or<br/>9 devices that you have found in his bedroom?<br/>10 MR. CRITTON: Form.<br/>11 THE WITNESS: I only found one, that massage,<br/>12 I thought it was a massage thing.<br/>13 BY MR. EDWARDS:<br/>14 Q All right.<br/>15 A You know that thing, and then I thought it's<br/>16 for -- that thing I only see.<br/>17 MR. CRITTON: Just so the record is clear, I<br/>18 think we all agree that she took her hand and<br/>19 like --<br/>20 MR. EDWARDS: She thought it was a back<br/>21 massager.<br/>22 MR. CRITTON: Probably was a back massager.<br/>23 MR. EDWARDS: Give me a break.<br/>24 MR. CRITTON: No. You want to argue sex toys,<br/>25 she's saying back massager. Just let her testify</p> |
| <p style="text-align: center;">46</p> <p>1 MR. CRITTON: No. But it's just painful. Ask<br/>2 her stuff that she knows.<br/>3 MR. EDWARDS: I know it's painful.<br/>4 MR. CRITTON: I could care less one way or the<br/>5 other. It's just a waste of both our times, Brad.<br/>6 MR. EDWARDS: You're getting paid for it. No<br/>7 defense attorney ever makes this argument on the<br/>8 record.<br/>9 MR. CRITTON: You know what, I get paid by a<br/>10 lot of people, and I don't need to do frivolous<br/>11 things in my mind, I'd rather just go home.<br/>12 THE WITNESS: I don't know.<br/>13 MR. EDWARDS: Okay.<br/>14 MR. [REDACTED]: Do you understand the question?<br/>15 THE WITNESS: Yeah. I do not know anything<br/>16 about that part.<br/>17 MR. CRITTON: From the last time I objected,<br/>18 can you just mark that, I want that two pages<br/>19 marked so I can get that somehow separate and<br/>20 apart.<br/>21 THE COURT REPORTER: Okay.<br/>22 BY MR. EDWARDS:<br/>23 Q Would it come as a surprise to you that<br/>24 Mr. Epstein used sexual devices such as vibrators on<br/>25 each of my clients when they were fourteen or fifteen</p>                                         | <p style="text-align: center;">48</p> <p>1 as distinct from argumentative.<br/>2 MR. EDWARDS: I'm letting her testify.<br/>3 MR. CRITTON: Okay.<br/>4 BY MR. EDWARDS:<br/>5 Q The only thing that you found in his bedroom<br/>6 was in the shape of something that you believed to be a<br/>7 back massager; is that fair?<br/>8 A Yes, sir. Yes.<br/>9 Q Okay. Who was the cleaning lady or<br/>10 housekeeper prior to you, do you know?<br/>11 A They have a cleaning crew.<br/>12 Q Prior to you?<br/>13 A Yes.<br/>14 Q To your knowledge, has anybody ever left the<br/>15 house, meaning left the employment of Mr. Epstein<br/>16 because of anything that was taking place in the house?<br/>17 A No, sir.<br/>18 Q Have you ever thought of leaving the<br/>19 employment of Mr. Epstein because of what was happening<br/>20 in the house?<br/>21 MR. CRITTON: Form.<br/>22 THE WITNESS: No, sir.<br/>23 BY MR. EDWARDS:<br/>24 Q Have you ever prayed for Mr. Epstein<br/>25 because of what was happening --</p>                                                                         |



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1 A I pray for my co-employees and for my, what's  
 2 this, employers.  
 3 Q Have you ever prayed for him related to these  
 4 females that come over to the house?  
 5 MR. CRITTON: Form.  
 6 THE WITNESS: I just lift his name to God,  
 7 that's it.  
 8 BY MR. EDWARDS:  
 9 Q Have you ever prayed for the females that come  
 10 over to his house?  
 11 A I prayed for everyone.  
 12 Q Do you know what Mr. Epstein does for a  
 13 living?  
 14 A I was told that he's an investor.  
 15 Q Who told you that?  
 16 A Coworkers.  
 17 Q Which coworkers?  
 18 A Lyn and Jojo.  
 19 Q Did Lyn and Jojo --  
 20 A And Alfredo.  
 21 Q And Alfredo.  
 22 Did Lyn and Jojo ever tell you about  
 23 Mr. Epstein getting females over to the house in  
 24 New York for massages?  
 25 MR. CRITTON: Form.

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1 THE WITNESS: They have visitors, that's what  
 2 I was told.  
 3 BY MR. EDWARDS:  
 4 Q Were you ever told that he gets massages by  
 5 females similar to the manner in West Palm Beach?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: Yes.  
 8 BY MR. EDWARDS:  
 9 Q And who told you that?  
 10 A Lyn.  
 11 Q And did she say with what frequency --  
 12 A No, sir.  
 13 Q -- he has females come over?  
 14 A No, sir.  
 15 Q You didn't continue the conversation after she  
 16 told you this?  
 17 A No. I just listen, and then she talks and  
 18 then that's it. We don't really, like, oh, no.  
 19 Q So is it your testimony that you don't know  
 20 what happens in the bedroom behind closed doors with  
 21 Mr. Epstein and these females?  
 22 A No, sir.  
 23 MR. [REDACTED]: One second. I want to make  
 24 sure you understand the question.  
 25 MR. CRITTON: Form.

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1 THE WITNESS: Yes. I do not know what's  
 2 happening inside.  
 3 MR. [REDACTED]: Okay.  
 4 BY MR. EDWARDS:  
 5 Q Okay. And have you ever asked what is going  
 6 on inside?  
 7 A No, sir.  
 8 Q Is that something that you have chosen just  
 9 not to find out about?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: I was told that he's going to  
 12 have a massage.  
 13 BY MR. EDWARDS:  
 14 Q Is that something that you believe?  
 15 A That's what I was told, and what's this.  
 16 Q You're aware of the allegations against  
 17 Mr. Epstein that each of these girls that was coming  
 18 over to his house -- each of these females that was  
 19 coming over to his house was engaging in sexual activity  
 20 with Mr. Epstein, right?  
 21 MR. CRITTON: Form.  
 22 THE WITNESS: Could you read the question  
 23 back?  
 24 (A portion of the record was read by the  
 25 reporter.)

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1 MR. CRITTON: Form.  
 2 MR. [REDACTED]: Did you understand the  
 3 question?  
 4 THE WITNESS: Yes.  
 5 MR. [REDACTED]: Yes, you understand the  
 6 question?  
 7 THE WITNESS: Yes.  
 8 MR. [REDACTED]: And I think the question was  
 9 are you aware of the allegations.  
 10 BY MR. EDWARDS:  
 11 Q Are you aware of the allegations?  
 12 A Through TV news.  
 13 Q Have you talked to anybody else about these  
 14 allegations being made against your employer?  
 15 A With Janusz.  
 16 Q When did you talk to Janusz about the  
 17 allegations being made against your employer?  
 18 A There is the scenario whenever I -- what's  
 19 this -- I heard the news, it's oh, the boss is on the  
 20 news. And that's it, to be honest.  
 21 Q And what would Janusz comment back to you, if  
 22 anything?  
 23 A Oh, he's in the news. So we did not really,  
 24 like, talk about...  
 25 Q But it's one thing when your boss is on the

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1 news and it's for accolades or for awards, it's another  
 2 thing when your boss is on the news related to  
 3 allegations that he is engaging in sexual activity with  
 4 minor females. Wouldn't you agree with that?  
 5 MR. CRITTON: Form, argumentative.  
 6 THE WITNESS: Of course there's a difference,  
 7 but...  
 8 BY MR. EDWARDS:  
 9 Q So did you talk to Janusz about the fact that  
 10 there are allegations that he is engaging in sex with  
 11 these minor females that are coming over to the house  
 12 and you're told that they're giving massages?  
 13 MR. CRITTON: Form, compound.  
 14 THE WITNESS: Not really. Like we don't  
 15 really discuss-discuss. We just oh, he's in the  
 16 news, and then that's it, and I go to work because  
 17 we're so busy, so...  
 18 BY MR. EDWARDS:  
 19 Q Do you talk to your family or anybody else  
 20 about --  
 21 A No.  
 22 Q Let me finish my question.  
 23 -- about the fact that many minor females have  
 24 alleged that they have come over to Mr. Epstein's house  
 25 and engaged in sexual activity with him in his bedroom

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1 while they were under the age of eighteen?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: No.  
 4 BY MR. EDWARDS:  
 5 Q Are you aware now that your employer,  
 6 Mr. Epstein, is a registered sex offender?  
 7 A I heard about it.  
 8 Q Does that bother you?  
 9 A Sometimes, but I don't know if the allegations  
 10 is true, so...  
 11 Q Because you don't know what's going on behind  
 12 closed doors, right, you have no idea?  
 13 MR. CRITTON: Form, argumentative.  
 14 BY MR. EDWARDS:  
 15 Q I hear you.  
 16 Have you ever asked your employer if the  
 17 allegations being made against him are true or if they  
 18 are not true related to his sexual activities with  
 19 underage females?  
 20 A No.  
 21 Q Isn't that something that you, as a religious  
 22 person, would want to know, whether that's true that  
 23 that's what's going on in the bedroom every day while  
 24 you're at work?  
 25 A Sir, I go there to work, not to, what's this,

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1 like pry on other personal activities.  
 2 Q Crimes are being committed against these girls  
 3 on a daily basis while you're working. And  
 4 hypothetically let's say you knew about it, would you  
 5 report it?  
 6 A If I knew about it, of course.  
 7 Q Sure. Like if you walked in on it, then would  
 8 you report it?  
 9 MR. CRITTON: Form.  
 10 MR. [REDACTED]: When you say "it," do you mean  
 11 a crime?  
 12 BY MR. EDWARDS:  
 13 Q Yeah. If you walked in on a crime?  
 14 A A crime? Of course. If it's a crime, I will.  
 15 Q Okay. I'm going to ask you if you've ever  
 16 witnessed certain acts. First I'm going to read to you  
 17 directly from the Florida Statutes related to a crime  
 18 called lewd and lascivious molestation. Okay.  
 19 A All right.  
 20 Q Florida Statute 794.021.  
 21 MR. [REDACTED]: Do you have a copy that she can  
 22 read along with you perhaps?  
 23 MR. EDWARDS: I don't have a copy, but I'll  
 24 hand it to her as soon as I've read it.  
 25 MR. [REDACTED]: Thank you.

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1 BY MR. EDWARDS:  
 2 Q It reads as follows:  
 3 A person who intentionally touches in a lewd  
 4 and lascivious manner the breasts, genitals,  
 5 genital area, or buttocks, or the clothing covering  
 6 them of a person less than sixteen years of age, or  
 7 forces or entices a person under sixteen years of  
 8 age to so touch the perpetrator, commits lewd or  
 9 lascivious molestation. An offender eighteen years  
 10 of age or older who commits lewd or lascivious  
 11 molestation against a victim twelve years of age or  
 12 older but less than sixteen years of age commits a  
 13 felony of the second degree.  
 14 Have you ever observed -- if you want to see  
 15 the law, you can. Have you ever observed that crime  
 16 committed in his house?  
 17 A No, sir.  
 18 MR. CRITTON: Form.  
 19 What statute was that?  
 20 MR. EDWARDS: It's 794.021, subsection five.  
 21 MR. CRITTON: Thank you.  
 22 BY MR. EDWARDS:  
 23 Q Subsection seven of that same statute, lewd  
 24 and lascivious exhibition, indicates:  
 25 A person who intentionally masturbates,



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1 intentionally exposes the genitals in a lewd or  
 2 lascivious manner, or intentionally commits any  
 3 other sexual act that does not involve actual  
 4 physical or sexual contact with the victim in the  
 5 presence of a victim who is less than sixteen years  
 6 of age commits lewd or lascivious exhibition. An  
 7 offender eighteen years of age or older who  
 8 commits a lewd or lascivious exhibition commits a  
 9 felony of the second degree.

10 Have you seen that crime committed in  
 11 Mr. Epstein's house?  
 12 A No, sir.  
 13 MR. CRITTON: Form.  
 14 BY MR. EDWARDS:  
 15 Q Are you aware of the allegations by multiple  
 16 female girls that allege that these are the crimes that  
 17 were taking place behind closed doors when they were  
 18 just minor females; are you aware of those allegations?  
 19 MR. CRITTON: Form.  
 20 MR. [REDACTED]: Do you understand the question?  
 21 MR. CRITTON: Asked and answered.  
 22 MR. [REDACTED]: Do you understand the question?  
 23 MR. CRITTON: And argumentative.  
 24 THE WITNESS: From the news, I heard that from  
 25 the news.

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1 BY MR. EDWARDS:  
 2 Q And are you also aware that many of these  
 3 girls did not know one another that were these female  
 4 masseuses, are you aware of that?  
 5 MR. CRITTON: Form.  
 6 THE WITNESS: I don't know.  
 7 BY MR. EDWARDS:  
 8 Q Okay. When these girls that would come --  
 9 Where these females that would come over where  
 10 you were told they were giving massages would come over,  
 11 how many would come over at any time, meaning would they  
 12 come over with twenty at time, or one at a time?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: Sometimes one at a time.  
 15 BY MR. EDWARDS:  
 16 Q And given the number of these females that are  
 17 making these allegations, doesn't it cause you to  
 18 believe the allegations that there are so many of them  
 19 and their stories are so strikingly similar as to what's  
 20 taking place in Mr. Epstein's bedroom?  
 21 MR. CRITTON: Form, predicate, speculation,  
 22 argumentative.  
 23 THE WITNESS: I don't know what's happening in  
 24 the bedroom, I did not see anything that cause me  
 25 alarm.

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1 BY MR. EDWARDS:  
 2 Q Have you ever worked for anyone that had this  
 3 many young females come over to his house every day?  
 4 A No, sir.  
 5 Q Have you ever heard anybody say that these  
 6 girls are making this up or that this did not happen,  
 7 these sexual acts did not happen in Mr. Epstein's  
 8 bedroom?  
 9 MR. CRITTON: Form, argumentative.  
 10 BY MR. EDWARDS:  
 11 Q By that I mean Mr. Epstein, Ghislaine Maxwell?  
 12 A No, sir. No.  
 13 Q Did [REDACTED] ever say any of these girls  
 14 were making this up?  
 15 A No, sir.  
 16 MR. CRITTON: Form.  
 17 BY MR. EDWARDS:  
 18 Q So these girls are making these allegations,  
 19 you work in Mr. Epstein's house?  
 20 A Yes.  
 21 Q And you've never heard anybody deny these  
 22 allegations, have you?  
 23 MR. CRITTON: Form, argumentative.  
 24 THE WITNESS: I do my job, we don't, like,  
 25 talk.

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1 BY MR. EDWARDS:  
 2 Q So is that a no, you've never heard anybody  
 3 deny that?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: No, sir.  
 6 BY MR. EDWARDS:  
 7 Q When was the last time you talked to  
 8 Ghislaine Maxwell?  
 9 A I answer the phone when she...  
 10 Q Okay. When you first started working there  
 11 back in November of 2004, she was the person who you  
 12 interviewed with, right?  
 13 A Yes, sir.  
 14 Q Was she somebody who you would regularly see  
 15 at the house during that period of time?  
 16 A Not regular.  
 17 Q How often would you see her in the house back  
 18 in the late 2004, when you were hired, through 2005?  
 19 A Three times.  
 20 Q Three times a week?  
 21 A No. During the period of that I was there.  
 22 Q Okay. During the entire five-year period you  
 23 were there you only saw Ghislaine Maxwell three times?  
 24 A Not five years.  
 25 Q Okay. From the end of 2004 through 2005 you



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1 saw her three times?  
 2 A Yes, sir.  
 3 Q During --  
 4 A Maybe more or less three times.  
 5 Q During 2006 how often did you see her?  
 6 A 2006? He was in New York, so I saw her.  
 7 Q You worked for Jeffrey Epstein but you worked  
 8 in New York? I'm sorry.  
 9 A I saw Ms. Maxwell in New York.  
 10 Q I think I understand. Primarily, though, you  
 11 were still working at the 358 El Brillo location?  
 12 A Yes.  
 13 Q However, at some point in time that year you  
 14 took a trip to the New York house and you saw her there?  
 15 A In her house.  
 16 Q In Ghislaine Maxwell's house?  
 17 A Yes.  
 18 Q What was the occasion for you to go see her up  
 19 there?  
 20 A Lyn was having I think surgery.  
 21 Q And when was that?  
 22 A I cannot recall the month, but it's I think  
 23 2006.  
 24 Q So this is after the criminal investigation  
 25 into Mr. Epstein, or before, if you remember?

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1 MR. CRITTON: Form, predicate.  
 2 THE WITNESS: 2006? After.  
 3 BY MR. EDWARDS:  
 4 Q Okay. And while you were up there with  
 5 Ghislaine Maxwell, did you talk to her about the  
 6 criminal investigation of Mr. Epstein?  
 7 A No, sir.  
 8 Q At any point in time when you were up there,  
 9 did she say to you or you overheard -- let me ask you  
 10 this way: Did she say to you that the allegations are  
 11 false --  
 12 MR. CRITTON: Form.  
 13 BY MR. EDWARDS:  
 14 Q -- that are being made against him?  
 15 MR. CRITTON: Form. There's no predicate that  
 16 a discussion ever took place about anything.  
 17 THE WITNESS: There was no discussion about  
 18 that.  
 19 MR. EDWARDS: Mr. Critton, if you could just  
 20 object to the form. Obviously this witnesses just  
 21 takes your words and she's going to recite them to  
 22 me. If you want to say lack of predicate, okay,  
 23 fine. But to say no discussion took place and then  
 24 she says no discussion took place, we're leading  
 25 the witness here, it's obvious.

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1 MR. CRITTON: But if you just asked her, say  
 2 did you ever have a discussion with her about it,  
 3 if she says yes, then we'll find out what it is.  
 4 If she didn't have one, why ask the question?  
 5 Go ahead.  
 6 THE WITNESS: There was no discussion.  
 7 MR. [REDACTED]: There's no question pending.  
 8 Wait for Mr. Edwards to ask his question and answer  
 9 the question if you understand it.  
 10 BY MR. EDWARDS:  
 11 Q How long were you at Ghislaine Maxwell's house  
 12 this time that you visited her in 2006?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: I cannot remember, because I  
 15 go...  
 16 BY MR. EDWARDS:  
 17 Q Back and forth?  
 18 A Yes.  
 19 Q From West Palm Beach to New York?  
 20 A Yes.  
 21 Q Why were you up in Ghislaine Maxwell's house  
 22 in New York?  
 23 A I help over there when she has a party.  
 24 Q Okay. And then after the party you would  
 25 return to West Palm Beach?

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1 A Yes.  
 2 Q While you were up there, during any of the  
 3 times that you were up there, did you have any  
 4 conversations with Ghislaine Maxwell?  
 5 A I think once. But it was oh, and what's this,  
 6 it was just oh, I'm sorry about the bad news. That's  
 7 it.  
 8 Q You said that?  
 9 A Because we have only, like, short  
 10 conversation, we just don't really, like, talk-talk.  
 11 Q When you're saying that a statement was made  
 12 I'm sorry about the bad news, who made the statement to  
 13 whom; she made it to you, or you made it to her?  
 14 A She made it. But that was -- I really cannot  
 15 remember how it was how, but it was, like, I'm sorry  
 16 about the news.  
 17 Q Okay. What news was she referring to when she  
 18 said to you I'm sorry to hear about the bad news?  
 19 A She not say anything. I just -- I do not say  
 20 anything about what the bad news is.  
 21 Q Okay. I guess what I'm asking is did you have  
 22 a death in the family or something happen to you  
 23 personally? Or why would she say this to you, if you  
 24 know?  
 25 A No.



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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: center;">65</p> <p>1 Q You have no idea why she said that statement?</p> <p>2 A I think that it was about the news that was</p> <p>3 going on about Mr. Epstein.</p> <p>4 MR. CRITTON: Move to strike as speculation.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q And did she elaborate on the news about</p> <p>7 Mr. Epstein?</p> <p>8 A No, sir.</p> <p>9 Q During that conversation where she makes a</p> <p>10 statement that she's sorry about the news, did she ever</p> <p>11 tell you that the allegations being made against him are</p> <p>12 false or unfounded or untrue?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: Our conversation was short.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q So the answer is no?</p> <p>17 A No.</p> <p>18 Q What is your understanding of</p> <p>19 Ghislaine Maxwell's role in Jeffrey Epstein's life back</p> <p>20 in 2004 and 2005 and 2006?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: She told me he was his boyfriend</p> <p>23 (sic).</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q Ghislaine Maxwell told you that</p>                  | <p style="text-align: center;">67</p> <p>1 Q What did she say when you answered the phone?</p> <p>2 A Oh, she was happy. I was happy to hear her</p> <p>3 voice. And then she said oh, she was also happy to --</p> <p>4 she was so nice on the phone.</p> <p>5 Q What did she say?</p> <p>6 A Oh, nice talking to you, Louella.</p> <p>7 Q Then did she ask to speak to somebody else?</p> <p>8 A To Mr. Epstein.</p> <p>9 Q Aside from the telephone call one month ago,</p> <p>10 how many times has she called the house in the last</p> <p>11 year?</p> <p>12 A That was my only, what's this, my -- the time</p> <p>13 that I was answer the phone and it was Ms. Maxwell.</p> <p>14 Q Do you know why she called Mr. Epstein?</p> <p>15 A I do not know, sir.</p> <p>16 Q Have you ever seen scheduling logs, either on</p> <p>17 a computer or on paper, with girls' names on it and</p> <p>18 numbers?</p> <p>19 A No. No, sir.</p> <p>20 Q Have you ever seen the names of these females</p> <p>21 that are alleged to have been masseuses written on</p> <p>22 anything?</p> <p>23 A Yes, sir.</p> <p>24 Q What have you seen them written on?</p> <p>25 A I just saw names, and that's it.</p>                       |
| <p style="text-align: center;">66</p> <p>1 Jeffrey Epstein was her boyfriend?</p> <p>2 A When I was hired.</p> <p>3 Q And then over the next year and a half when</p> <p>4 Jeffrey Epstein was in West Palm Beach, you only saw</p> <p>5 Ghislaine Maxwell at the house approximately three</p> <p>6 times?</p> <p>7 A Yes, sir.</p> <p>8 Q Did you still believe that Ghislaine Maxwell</p> <p>9 and Jeffrey Epstein were boyfriend and girlfriend?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: At that time or what time?</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q Yeah. Back then in 2004, 2005.</p> <p>14 A Yes.</p> <p>15 Q All right. Is it your understanding that they</p> <p>16 are still boyfriend and girlfriend today?</p> <p>17 A I don't know.</p> <p>18 Q Ghislaine Maxwell and Jeffrey Epstein, do they</p> <p>19 still talk to one another today?</p> <p>20 A I do not know, sir.</p> <p>21 Q What is the last time that you talked to</p> <p>22 Ghislaine Maxwell?</p> <p>23 A She called the house and I answered the phone.</p> <p>24 Q How long ago?</p> <p>25 A About a month ago.</p> | <p style="text-align: center;">68</p> <p>1 Q Just the names, or the telephone numbers as</p> <p>2 well?</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: I cannot remember.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q Where did you see this?</p> <p>7 A We have like butler's pantry and there's a</p> <p>8 telephone there.</p> <p>9 Q Is this in the staff house or the main house?</p> <p>10 A No. The main house.</p> <p>11 Q And do you know who wrote the names?</p> <p>12 A No, sir.</p> <p>13 Q How do you know that these were the names of</p> <p>14 the females that were alleged to have been masseuses?</p> <p>15 A Because there is time.</p> <p>16 Q What do you mean, there is time?</p> <p>17 A Sometimes name and then the time, that's it.</p> <p>18 Q What does the time indicate?</p> <p>19 A I cannot remember.</p> <p>20 Q The time to you -- you know, I'm watching what</p> <p>21 you're doing, but the court reporter is not able to draw</p> <p>22 a picture of it. So I guess what I'm asking is you're</p> <p>23 saying there is -- on the left-hand side there is a</p> <p>24 name, and on the right-hand side corresponding to that</p> <p>25 name there is a time written down? Is that what you</p> |



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1 indicated?  
 2 A Yes.  
 3 Q And that time is indicative of the appointment  
 4 time when that female was supposed to be at  
 5 Mr. Epstein's house?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: I really don't know if that's  
 8 the one that indicate who is coming, I just see  
 9 names there and then time.  
 10 BY MR. EDWARDS:  
 11 Q Describe for me what this book looks like, or  
 12 what this piece of paper looks like.  
 13 A Somewhere there are like white paper we write  
 14 the names, if I hear -- if somebody receives a call, and  
 15 then we write the name of the person and the time.  
 16 Q It sounds like you've answered the phone for  
 17 when one of these females has called?  
 18 A Sometimes.  
 19 MR. CRITTON: Form.  
 20 BY MR. EDWARDS:  
 21 Q How many times in the last five years have you  
 22 answered the telephone when one of these females has  
 23 called?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: I cannot remember.

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1 BY MR. EDWARDS:  
 2 Q All right. I asked this question that way  
 3 because you said sometimes we take the message.  
 4 A Yes.  
 5 Q And when you say we, you're including  
 6 yourself?  
 7 A Yes.  
 8 Q Okay. And when the female would call to  
 9 schedule -- I mean, when the female could call, what  
 10 exactly would she say where you would write down a name  
 11 and a time?  
 12 A I don't know if -- I just receive a call and  
 13 then I get the message and write the name and the time.  
 14 Q Okay. It's just a message from whom?  
 15 A For Mr. Epstein.  
 16 Q And who is the call that -- the calls that  
 17 you're referring to, who are they, who is calling?  
 18 A They are female voices.  
 19 Q And are they asking to come over to give a  
 20 message, to work, to --  
 21 A To work.  
 22 Q And what is the language that the females  
 23 would typically use when they would call --  
 24 MR. CRITTON: Form.  
 25

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1 BY MR. EDWARDS:  
 2 Q -- and you would answer the phone?  
 3 A Again, can you...  
 4 Q What would they say? Hi, this is Mary, I'd  
 5 like to come work, is there a time available for me.  
 6 I'm making this up. What would they say?  
 7 MR. CRITTON: Form.  
 8 BY MR. EDWARDS:  
 9 Q If you know.  
 10 A They just say the, what's this. The female  
 11 will just -- tell Mr. Epstein I called.  
 12 Q Okay. Just tell him I called?  
 13 A Uh-huh.  
 14 Q And you would write down the name of the  
 15 person and the time the person called?  
 16 A Yes, sir.  
 17 MR. [REDACTED]: When you get to a convenient  
 18 breaking point.  
 19 MR. EDWARDS: Let's break.  
 20 (Brief recess in proceedings.)  
 21 MR. [REDACTED]: It may be obvious to us in the  
 22 room, but it may not be apparent in the cold record  
 23 that English is not Ms. Rabuyo's first language.  
 24 So that's why I've interrupted a couple of times  
 25 and asked her if she understands the question,

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1 because it's apparent to me sometimes that her  
 2 English isn't as eloquent as Mr. Edwards.  
 3 BY MR. EDWARDS:  
 4 Q What is your first language, Ms. Rabuyo?  
 5 A Visayan and Tagalog.  
 6 Q Do you feel comfortable with taking this  
 7 deposition in English; meaning do you understand my  
 8 questions and are you giving me answers that are  
 9 truthful and accurate?  
 10 A Sometimes I have to ask you to rephrase  
 11 because, you know.  
 12 Q Okay. And when you've asked me to rephrase  
 13 and I've rephrased the question, have you understood it  
 14 and given me an answer that you feel is accurate?  
 15 A Yes.  
 16 Q Okay. Did you ever talk to the police?  
 17 A No.  
 18 Q Have you ever talked to the FBI?  
 19 A No.  
 20 Q Were you ever asked to talk to the State  
 21 Attorney's Office?  
 22 A No.  
 23 Q Were you ever asked to talk to the United  
 24 States Attorney's Office?  
 25 A No.



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1 Q Did you ever talk to any law enforcement type  
2 related to the Jeffrey Epstein criminal investigation?  
3 A No, sir.  
4 Q Did you remain employed from November 2004  
5 through today continuously with Jeffrey Epstein?  
6 A Yes, sir.  
7 Q Was it discussed as to how your employment  
8 would be altered, if at all, while Mr. Epstein was going  
9 to be either -- while Mr. Epstein was going to be in  
10 jail or away from the house?  
11 A No, sir.  
12 Q Did you know, did you have any prior warning  
13 before Mr. Epstein pled guilty and went to jail?  
14 A No, sir.  
15 Q All right. So it was just one day he's there  
16 and the next day he's not, as far as you knew?  
17 A Janusz, we discuss it with Janusz, he received  
18 a call, and then oh, Mr. Epstein is coming so is how I  
19 know.  
20 Q I'm sorry. Maybe we miscommunicated there.  
21 You're saying that Janusz received a call that  
22 Mr. Epstein was coming to the house?  
23 A Your first question was?  
24 Q Were you made aware of the date or time period  
25 that Mr. Epstein would be going to court to plead guilty

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1 to crimes and then going to jail so that he would no  
2 longer be at the house, were you made aware that that  
3 was going to take place?  
4 A Not directly.  
5 Q Okay. Indirectly then, did you know that that  
6 was taking place?  
7 A No. Janusz and I talked, so...  
8 Q And what did Janusz tell you about Mr. Epstein  
9 going to court and after court he would be in jail and  
10 no longer at the house?  
11 A We really don't know when he's going there to  
12 jail or is going to court. It's just a discussion like  
13 oh, he's going to court or something, but the date and  
14 the time, no.  
15 Q I'm not concerned with the date and the time.  
16 I guess what I'm getting at just is were you told that  
17 there was going to be a time period he was going to be  
18 in jail?  
19 A No.  
20 Q All right. There was a period of time that  
21 was just over a year where Mr. Epstein was not in the  
22 house, that being from June 30th, 2008 through sometime  
23 in July of 2009; correct?  
24 A Yes.  
25 Q And do you know where he was during that time?

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1 A Yes.  
2 Q Where?  
3 A In jail.  
4 Q How do you know that?  
5 A Through Janusz or, what's this, through the  
6 news.  
7 Q So you did you work at his house during the  
8 time period --  
9 A Yes.  
10 Q Wait until I finish.  
11 A Sorry.  
12 Q Did you work at his house during time period  
13 when Mr. Epstein was in jail?  
14 A I did.  
15 Q Did you see Mr. Epstein during that year time  
16 period?  
17 A No.  
18 Q What was your schedule during that year time  
19 period that Mr. Epstein was in jail?  
20 A Flexible. No. Wait. The time that he was in  
21 jail?  
22 Q Right. June 30th, 2008 through sometime in  
23 July, 2009.  
24 MR. [REDACTED]: Do you understand the question?  
25 THE WITNESS: Yes.

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1 MR. [REDACTED]: Okay. Go ahead and answer it  
2 then.  
3 THE WITNESS: I usually come nine o'clock.  
4 BY MR. EDWARDS:  
5 Q And you would leave?  
6 A At 5:00 or 5:30.  
7 Q And who else would be in the house during that  
8 year time period from June 2008 through July 2009?  
9 A Only Janusz and me; and the gardener, he  
10 passed away.  
11 Q Who?  
12 A The gardener.  
13 Q Jerome?  
14 A Jerome.  
15 Q And you said he said passed away?  
16 A Yes.  
17 Q When was that?  
18 A I remember right we came from New York, I  
19 cannot remember, but I remember when we came from  
20 New York, we attended his -- not burial, the ceremony in  
21 church.  
22 Q Do you know how he passed away?  
23 A Janusz told me that he has a heart attack or  
24 something.  
25 Q Okay. But it wasn't on the property while he



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1 was working?  
 2 A No.  
 3 Q During that year time period that Mr. Epstein  
 4 was in jail, what did you do on a day-to-day basis when  
 5 you were there from 9:00 to 5:00?  
 6 A I clean the house, I made inventory of the  
 7 linens, and what's this, started inventorying, making an  
 8 inventory of the silverwares.  
 9 Q Okay. Did you talk to [REDACTED] during  
 10 that time period he was in jail?  
 11 A Yes.  
 12 Q And [REDACTED] went to visit him in jail numerous  
 13 times; are you aware of that?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: No, sir.  
 16 BY MR. EDWARDS:  
 17 Q And did [REDACTED] stay in the house during  
 18 the time period where Mr. Epstein was in jail?  
 19 A Yes.  
 20 Q Permanently, or did she fly in town and fly  
 21 back somewhere else?  
 22 A (Nodding head.)  
 23 MR. [REDACTED]: You have to say yes or no.  
 24 THE WITNESS: Yes.  
 25 MR. [REDACTED]: Yes she flew in, or yes she

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1 stayed permanently?  
 2 THE WITNESS: Not for a longer period.  
 3 BY MR. EDWARDS:  
 4 Q Okay. Who would she fly into town with, if  
 5 anyone?  
 6 A Alone. I don't know, because she just come to  
 7 the house and that's how she's there. I didn't know who  
 8 she came with.  
 9 Q Did she come to the house alone, she being  
 10 [REDACTED]?  
 11 MR. [REDACTED]: Again, we're talking during the  
 12 time period when Mr. Epstein is in jail?  
 13 THE WITNESS: Yes.  
 14 MR. [REDACTED]: Thank you.  
 15 THE WITNESS: So one time she came with male  
 16 friend.  
 17 BY MR. EDWARDS:  
 18 Q With a male friend?  
 19 A Yes.  
 20 Q Do you know his name?  
 21 A I forgot it.  
 22 Q Was it Igor?  
 23 A No.  
 24 Q Was it Story?  
 25 A No.

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1 Q Was it somebody from New York?  
 2 A What, you mean when he was jail?  
 3 Q When he was in jail.  
 4 A Story.  
 5 Q It was Story?  
 6 A It was Story.  
 7 Q This is Story Cowles? Do you know the last  
 8 name?  
 9 A I don't know his last name.  
 10 Q And when you say she came with a person, you  
 11 mean she came to the house with a person named Story?  
 12 A Yes.  
 13 Q And do you know if that person named Story  
 14 flew in with [REDACTED] from elsewhere?  
 15 A I don't know.  
 16 Q And did Story stay at the house with  
 17 [REDACTED]?  
 18 A No, sir.  
 19 Q All right. So this is during the day he came  
 20 over, Story came over and visited with [REDACTED]?  
 21 A Visited? I think so.  
 22 Q Okay. Do you know the purpose for Mr. Cowles,  
 23 or Story as you referred to him, meeting with  
 24 [REDACTED] at the house during the year time period  
 25 when Mr. Epstein was in jail?

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1 A No.  
 2 Q What did you watch them do together, if  
 3 anything?  
 4 A Do the computer.  
 5 Q All right. How many computers were there in  
 6 the house during the year time period Mr. Epstein was in  
 7 jail?  
 8 A They have their own personal computers.  
 9 Q Who is "they"?  
 10 A If you're asking about [REDACTED] and Story?  
 11 Q Right. They brought laptops with them, you're  
 12 saying?  
 13 A Yes.  
 14 Q Okay. For the period of time between  
 15 November 2004 through June of 2008, when -- sorry.  
 16 Were you working at the house when the police  
 17 executed a search warrant on the house?  
 18 A No.  
 19 Q You were not working at the house?  
 20 A I wasn't.  
 21 Q Were you aware of a search warrant being  
 22 executed on the house?  
 23 A No.  
 24 Q Did you know that a search warrant was ever  
 25 executed on the house at 358 El Brillo Way?



|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: center;">81</p> <p>1 A When I came back to report, that's how I<br/>2 learned.</p> <p>3 Q Elaborate on that for me. What do you mean,<br/>4 when you came back to report that's how I learned?</p> <p>5 A I reported in the afternoon, and then that's<br/>6 how I learned that the police came.</p> <p>7 Q All right. And when were you -- you're now<br/>8 saying you came back to report and you learned that the<br/>9 police had already come to the house, right?</p> <p>10 A Yes, sir.</p> <p>11 Q Prior to that occasion, when was the previous<br/>12 time that you were at the house?</p> <p>13 A The day before.</p> <p>14 Q Okay. And the day before you left your shift<br/>15 at roughly five o'clock?</p> <p>16 A I cannot remember. I usually leave 5:00 or<br/>17 5:30.</p> <p>18 Q But sometime late in the afternoon?</p> <p>19 A Yes.</p> <p>20 Q And as of that time, the day before the search<br/>21 warrant was issued, you had seen no police officers in<br/>22 or around the house?</p> <p>23 A No.</p> <p>24 Q And then the next day you reported to the job<br/>25 at what time?</p> | <p style="text-align: center;">83</p> <p>1 Q So are we talking about the day the police<br/>2 went to Jeffrey Epstein's house you did not go in the<br/>3 morning, but you went after lunch and the police had<br/>4 already left?</p> <p>5 A Oh. No. When I went there nobody was there,<br/>6 no policemen were around.</p> <p>7 Q Who was at the house then?</p> <p>8 A Janusz, and Douglas, the architect.</p> <p>9 Q Schoettle?</p> <p>10 A Yes.</p> <p>11 Q And did you have a discussion with them?</p> <p>12 A No.</p> <p>13 Q How did you know the police had been to the<br/>14 house?</p> <p>15 A Janusz told me.</p> <p>16 Q When?</p> <p>17 A When I arrive.</p> <p>18 Q That's what I was asking you when I said did<br/>19 you have a discussion with them, meaning Janusz and<br/>20 Douglas.</p> <p>21 A Okay. Being because them -- with Janusz only.</p> <p>22 Q What did he say?</p> <p>23 A He said the police came and, what's this, took<br/>24 away some stuff.</p> <p>25 Q Did he say what they took?</p>                                                                    |
| <p style="text-align: center;">82</p> <p>1 A The next day?</p> <p>2 Q The next day.</p> <p>3 A I report in the afternoon.</p> <p>4 Q Was there a reason why you reported in the<br/>5 afternoon?</p> <p>6 A Ms. Maxwell called me.</p> <p>7 Q When did she call you?</p> <p>8 A During that day, she said Louella, you can<br/>9 report in the afternoon.</p> <p>10 Q She called you early in the morning?</p> <p>11 A Not early.</p> <p>12 Q Normally you would report to the house between<br/>13 eight and nine o'clock, right?</p> <p>14 A Yes, sir.</p> <p>15 Q So in order for you not to arrive at the<br/>16 house, she had to have called you before eight or<br/>17 nine o'clock, right?</p> <p>18 A Yes.</p> <p>19 Q Okay. So approximately what time does<br/>20 Ms. Maxwell call you to tell you you can report to the<br/>21 house later on that day?</p> <p>22 A I cannot remember really the time.</p> <p>23 Q Okay. What time did you actually report to<br/>24 the house?</p> <p>25 A After lunch, about -- maybe after lunch.</p>                                                                                    | <p style="text-align: center;">84</p> <p>1 A He said pictures.</p> <p>2 Q Did he tell you which pictures?</p> <p>3 A No, sir.</p> <p>4 Q Aside from pictures, what else did the police<br/>5 take, as Janusz told you?</p> <p>6 A He did not elaborate.</p> <p>7 Q All right. Prior to the police going to the<br/>8 house and taking pictures, do you remember seeing<br/>9 pictures around Mr. Epstein's house?</p> <p>10 A Yes.</p> <p>11 Q Do you remember seeing pictures of naked or<br/>12 nude females around Mr. Epstein's house?</p> <p>13 A Not around, in his closet.</p> <p>14 Q In Mr. Epstein's closet you would see --<br/>15 describe what you would see related to females in<br/>16 pictures.</p> <p>17 A Some have topless.</p> <p>18 Q Is this a big closet?</p> <p>19 A No. Not really big, it's just this big, not<br/>20 so big.</p> <p>21 Q Okay. Were these pictures that could be seen<br/>22 by -- strike that.</p> <p>23 Do you know of any other pictures of females<br/>24 that were confiscated by the police that did not come<br/>25 from Mr. Epstein's closet?</p> |



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1 MR. CRITTON: Form.  
 2 THE WITNESS: Nude picture?  
 3 BY MR. EDWARDS:  
 4 Q Any other pictures that were taken by the  
 5 police that were not taken from his closet.  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: One.  
 8 BY MR. EDWARDS:  
 9 Q Where was that picture?  
 10 A The hallway leading to the master bedroom.  
 11 Q And what was that picture of?  
 12 A It's like advertisement, small child.  
 13 Q A small child. When you say "small child,"  
 14 what age range are you talking about?  
 15 A Maybe four.  
 16 Q What is that child in that picture who is  
 17 maybe four doing?  
 18 A I cannot really, like -- I don't know what's  
 19 this, but I think the underwear was (indicating), like  
 20 pulled down.  
 21 MR. CRITTON: Just for the record, she's  
 22 pointing to her rear-end, derriere.  
 23 BY MR. EDWARDS:  
 24 Q So in this picture that was taken by the  
 25 police or confiscated by the police, it was in the

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1 hallway and it was of a child roughly four years old  
 2 that was pulling down her underwear and exposing her  
 3 buttock area; is that fairly accurate?  
 4 A Yes. Not really full, just like slightly,  
 5 that's what I remember.  
 6 Q Okay. Are there any other photographs that  
 7 were confiscated by the police, to your knowledge?  
 8 A No.  
 9 Q So how many photographs had you seen prior to  
 10 the police going into Mr. Epstein's house in  
 11 Mr. Epstein's closet?  
 12 MR. CRITTON: Form.  
 13 THE WITNESS: Less than ten.  
 14 BY MR. EDWARDS:  
 15 Q Okay. So there were less than ten photographs  
 16 in Mr. Epstein's closet that you remember?  
 17 A Yes.  
 18 Q And what were those photographs of, these less  
 19 than ten?  
 20 A Half nude women.  
 21 Q Do you know the ages of those women?  
 22 A No, sir.  
 23 Q Do you know the approximate ages of those  
 24 women in those photographs?  
 25 A No.

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1 MR. CRITTON: Form.  
 2 BY MR. EDWARDS:  
 3 Q You were able to tell me the approximate age  
 4 of the child in the photograph, but you're unable to  
 5 tell me the approximate age --  
 6 A It was just a guess for four, because I could  
 7 hardly, like, tell the age. It was just maybe four,  
 8 because...  
 9 Q Okay. Was there anything else in the house  
 10 that you were told was taken by the police?  
 11 A No, sir.  
 12 Q Prior to the day when the police came to the  
 13 house, how many computers did Mr. Epstein have in his  
 14 house?  
 15 MR. CRITTON: Form, predicate.  
 16 THE WITNESS: One -- three.  
 17 BY MR. EDWARDS:  
 18 Q Where were those three computers located?  
 19 A In the cabana, in one of the desks, and one in  
 20 the little office.  
 21 Q And after the police came to the house do you  
 22 remember seeing those computers any more?  
 23 A No. I really did not focus on what was  
 24 missing, only the picture that was big, and in the  
 25 bedroom.

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1 Q Okay. But you're aware, as you told me, that  
 2 there were these computers --  
 3 A Yes.  
 4 Q Let me finish.  
 5 A Sorry.  
 6 Q You where aware, as you told me, that there  
 7 were these computers that you described as being three  
 8 computers in Mr. Epstein's house, right?  
 9 A Yes, sir.  
 10 Q And do you know whether those were taken out  
 11 of Mr. Epstein's house by Mr. Epstein or somebody  
 12 associated with Mr. Epstein, or by the police?  
 13 A I'm not aware.  
 14 Q So to the best of your knowledge, the police  
 15 took less than ten photographs from Mr. Epstein's house,  
 16 and that should be all of the evidence or objects that  
 17 were taken by the police from Mr. Epstein's house, to  
 18 your knowledge?  
 19 MR. CRITTON: Form, predicate.  
 20 THE WITNESS: I don't know.  
 21 BY MR. EDWARDS:  
 22 Q I'm only asking what you do know.  
 23 To your knowledge, what you described to me  
 24 as -- I just want to know a list of all the things that  
 25 you know were taken by the police. And you've described



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1 to me I believe one photograph of this four-year-old  
 2 child as well as less than ten photographs that were  
 3 previously in Mr. Epstein's closet.  
 4 A Yes.  
 5 MR. CRITTON: Form.  
 6 BY MR. EDWARDS:  
 7 Q Is there anything else that you know was taken  
 8 by the police?  
 9 A No.  
 10 Q Since Mr. Epstein has been out of jail, I  
 11 guess this is since July of 2009, what has your schedule  
 12 been?  
 13 A My schedule has changed.  
 14 Q To what?  
 15 A From 6:00 to 3:30.  
 16 Q 6:00 a.m.?  
 17 A Yes, sir.  
 18 Q And why the schedule change?  
 19 A Because I was chosen to give breakfast.  
 20 Q To whom?  
 21 A Mr. Epstein.  
 22 Q By whom?  
 23 A Because it was Janusz was there usually gives  
 24 the breakfast, but there was a change, it was me.  
 25 Q Okay. You don't know why that change

90

1 occurred?  
 2 A No.  
 3 Q Well, do you know why that change occurred?  
 4 A Because so that somebody -- because Janusz has  
 5 to stay later, so...  
 6 Q Every morning now you serve breakfast to  
 7 Mr. Epstein?  
 8 A Yes, sir.  
 9 Q So that's why you're required to be there at  
 10 6:00 a.m. Is that what time he eats?  
 11 A 6:30.  
 12 Q Tell me since Mr. Epstein has been out of jail  
 13 and back at the house, what other people have frequently  
 14 visited and/or stayed at house?  
 15 A Who?  
 16 Q Who.  
 17 A [REDACTED], [REDACTED]. Story.  
 18 Q And where does Mr. Epstein sleep in the house  
 19 since he's been out of jail?  
 20 A Where? In the master bedroom.  
 21 Q All right. And where does [REDACTED] sleep?  
 22 A I'm not aware if -- I did not see if they  
 23 sleep together or...  
 24 Q Well, you tidy up the house the following day,  
 25 correct?

91

1 A Yes.  
 2 Q So you know what bedrooms need to be tidied up  
 3 and look like someone slept there?  
 4 A Yes.  
 5 Q And does it appear that [REDACTED] slept in the  
 6 same bedroom as Mr. Epstein, or some other bedroom?  
 7 A Sometimes the other bedroom is also, like,  
 8 slept in.  
 9 Q Okay. So sometimes --  
 10 A Sometimes one bed is the master, and sometimes  
 11 the other, what's this, is slept in.  
 12 Q What is your understanding of the relationship  
 13 between [REDACTED] and Mr. Epstein?  
 14 A Relationship?  
 15 Q Yeah. What is your understanding of [REDACTED]  
 16 role in Mr. Epstein's life?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: She did not tell me that. She's  
 19 his girlfriend, so she stays there, so...  
 20 BY MR. EDWARDS:  
 21 Q She didn't tell you, or she did?  
 22 A She did not.  
 23 Q She did not tell you.  
 24 How long has [REDACTED] been around Mr. Epstein, to  
 25 the best of your memory?

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1 A Since a few months I started working there.  
 2 Q Okay. So that's late 2005 you're talking  
 3 about, or 2004? Sorry.  
 4 A 2005, I think.  
 5 MR. CRITTON: 2005?  
 6 MR. EDWARDS: She said 2005.  
 7 MR. CRITTON: Okay.  
 8 BY MR. EDWARDS:  
 9 Q And what was your understanding back then why  
 10 she was at the house with Mr. Epstein?  
 11 A Understanding? I thought she is his  
 12 girlfriend.  
 13 Q Ghislaine Maxwell, when she hired you or  
 14 interviewed you, told you that she, Ghislaine, was  
 15 Mr. Epstein's girlfriend, right?  
 16 A Yes.  
 17 Q And then a month or two after you began  
 18 working at Mr. Epstein's house [REDACTED] is also around the  
 19 house and you believed that she was Mr. Epstein's  
 20 girlfriend?  
 21 A I want to -- before I did not know that, she  
 22 was just a visitor.  
 23 Q Okay. When was it that you started, you were  
 24 led to believe, or based on your observations you  
 25 believed that [REDACTED] was a girlfriend of Mr. Epstein?

93

1 A 2006. No. Wait. When he was in jail.  
 2 Q All right. When Mr. Epstein was in jail  
 3 between June 2008 and July of 2009 is the first time  
 4 that you began to believe that [REDACTED] was a girlfriend of  
 5 Mr. Epstein?  
 6 A Yes. That's just my own, but she did not tell  
 7 me that she's the girlfriend.  
 8 Q Did anybody tell you that?  
 9 A No.  
 10 Q Prior to that period of time when Mr. Epstein  
 11 was in jail, what was your understanding as to [REDACTED]  
 12 relationship to Mr. Epstein or role in Mr. Epstein's  
 13 life?  
 14 A A friend.  
 15 Q What did she do when she was at the house  
 16 prior to Mr. Epstein going to jail, [REDACTED], what did  
 17 [REDACTED] do?  
 18 A What did she do?  
 19 Q What did [REDACTED] do around the house prior to  
 20 Mr. Epstein going to jail?  
 21 A Go shopping.  
 22 Q Anything else?  
 23 A That's what I know only.  
 24 Q Do you remember a person named  
 25 [REDACTED]?

94

1 A Adriana?  
 2 Q Yes.  
 3 A I remember a name Adriana, but the family  
 4 name, no.  
 5 Q And what did Adriana do at Mr. Epstein's  
 6 house, if anything?  
 7 A Alfredo told me that Adriana is a personal  
 8 assistant.  
 9 Q Similar to [REDACTED] ?  
 10 A Yes.  
 11 Q Was there anything that you observed that  
 12 would distinguish [REDACTED] from Adriana in terms of  
 13 the role that they played in Mr. Epstein's life?  
 14 A Not really.  
 15 Q Is that somebody who you believe scheduled  
 16 Mr. Epstein for massages with the females, Adriana?  
 17 A I don't know.  
 18 Q And were you ever told that by anybody that  
 19 [REDACTED] was also involved in sex acts with minor females  
 20 at Mr. Epstein's house?  
 21 A No.  
 22 MR. CRITTON: Form.  
 23 BY MR. EDWARDS:  
 24 Q Am I the first person that has said that in  
 25 your presence?

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1 A Yes.  
 2 Q Have you ever been told that [REDACTED] was  
 3 purchased from her family by Mr. Epstein?  
 4 A No.  
 5 Q Have you ever been told that [REDACTED] serves as a  
 6 lesbian sex slave for Jeffrey Epstein?  
 7 A No.  
 8 Q Since Mr. Epstein has been out of jail, you  
 9 indicated that the frequent visitors are [REDACTED], [REDACTED],  
 10 and Story; right?  
 11 A Yes, sir.  
 12 Q And does Story stay at the house?  
 13 A No.  
 14 Q How often is Story at the house?  
 15 A Often. Like they come in the morning, they  
 16 stay a few hours, then leave.  
 17 Q Who is "they"?  
 18 [REDACTED] and Story.  
 19 Q And is that on a daily basis?  
 20 A Not always.  
 21 Q Do you know if [REDACTED] or Story -- do you know  
 22 if [REDACTED] is staying at Mr. Epstein's house now?  
 23 A No.  
 24 Q You don't know, or she's not?  
 25 A No, she's not.

96

1 Q Do you know where she is staying?  
 2 A Not now, no.  
 3 Q Do you know if she's staying with Story?  
 4 A I don't know.  
 5 Q Do you know if Story is [REDACTED] boyfriend?  
 6 A Yes.  
 7 Q And is that the relationship between Story and  
 8 [REDACTED], they're boyfriend and girlfriend, as you  
 9 understand it?  
 10 A Yes.  
 11 Q And do you know how it is that they met?  
 12 A I don't know.  
 13 Q Do you know how long they've been boyfriend  
 14 and girlfriend?  
 15 A No.  
 16 Q Do you know, have you witnessed Story talking  
 17 with Mr. Epstein at Mr. Epstein's house?  
 18 A Yes.  
 19 Q And where do those conversations take place?  
 20 A In the breakfast room.  
 21 Q And when those conversations are taking place  
 22 in the breakfast room between Story and Mr. Epstein, is  
 23 [REDACTED] also there?  
 24 A There are times when she's there, there is  
 25 times that she's not there.



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1 Q All right. So there are times that Story  
 2 talks directly with Mr. Epstein in the breakfast room  
 3 and it's just two of them?  
 4 A Yes.  
 5 Q All right. And there are times when Story  
 6 talks with Mr. Epstein in the breakfast room and  
 7 [REDACTED] is also there?  
 8 A Yes.  
 9 Q Are there times when [REDACTED] is also involved in  
 10 conversations where Story and Mr. Epstein are talking  
 11 with one another in the breakfast room?  
 12 A Yes.  
 13 Q Are there times when all four of them, that  
 14 meaning [REDACTED], [REDACTED], Story, and Mr. Epstein, are all  
 15 conversing together in the breakfast room?  
 16 A Yes.  
 17 Q Have you overheard the conversations?  
 18 A No.  
 19 Q Do you know or have you been made aware of  
 20 them talking about the allegations concerning  
 21 Mr. Epstein and female masseuses?  
 22 A No, sir.  
 23 Q Since Mr. Epstein has been out of jail in July  
 24 of 2009, have you seen any females coming over to give  
 25 Mr. Epstein a massage?

98

1 A No, sir.  
 2 Q Do you know why that is?  
 3 A I don't know, sir.  
 4 Q Does [REDACTED] have you seen [REDACTED] keeping a  
 5 schedule of females or masseuses?  
 6 A No, sir.  
 7 Q Since July of 2009, has Jeffrey Epstein spent  
 8 every night at the Palm Beach house, to your knowledge?  
 9 MR. CRITTON: Form, predicate.  
 10 THE WITNESS: I leave at 3:30, so...  
 11 BY MR. EDWARDS:  
 12 Q When you arrive every morning at 6:00 a.m.,  
 13 has Mr. Epstein been there every day?  
 14 A Yes, sir.  
 15 Q Aside from [REDACTED], [REDACTED], and Story, have there  
 16 been any other visitors that are regular visitors of  
 17 Mr. Epstein since he's been out of jail?  
 18 A Some female friends.  
 19 Q Who would those people be?  
 20 A Difficult names. [REDACTED].  
 21 Q [REDACTED] who?  
 22 A I don't know their...  
 23 Q Do you know where she comes from?  
 24 A No.  
 25 Q And I don't mean her country of origin. I

99

1 mean do you know if she flies in from New York or flies  
 2 in from LA, or where she lives down the street in  
 3 Palm Beach?  
 4 A No. She said she comes from New York.  
 5 Q What does she do when she's in Palm Beach?  
 6 A Go to the beach.  
 7 Q Did you know her prior to -- had you seen her  
 8 prior to Mr. Epstein going to jail?  
 9 A No, sir.  
 10 Q Other than [REDACTED], are there any other  
 11 visitors that you have witnessed or observed?  
 12 A Sultan.  
 13 Q Who is that?  
 14 A Sultan.  
 15 Q S-U-L-T-A-N?  
 16 A Yes.  
 17 Q Is that a female?  
 18 A A male.  
 19 Q Do you know what Sultan does?  
 20 A No, sir.  
 21 Q Do you know why he's ever at the house?  
 22 A No.  
 23 Q How often is Sultan there?  
 24 A I saw him two times.  
 25 Q And is that somebody that you saw prior to

100

1 Mr. Epstein going to jail?  
 2 A No, sir.  
 3 Q So the first time you saw him was sometime  
 4 after Mr. Epstein got out of jail?  
 5 A Yes, sir.  
 6 Q Any other visitors that you've seen since  
 7 Mr. Epstein's been out of jail in July?  
 8 A [REDACTED].  
 9 Q And who is [REDACTED]?  
 10 A She's also a friend.  
 11 Q A friend of whom?  
 12 A Mr. Epstein.  
 13 Q And where does she come from?  
 14 A I did not ask her, I did not know.  
 15 Q All right. Is it somebody that a driver has  
 16 to go pick up from the airport, or she flew from  
 17 somewhere?  
 18 A Yes. Janusz.  
 19 Q Janusz picks these people up from the airport?  
 20 A Yes, sir.  
 21 MR. CRITTON: Form.  
 22 BY MR. EDWARDS:  
 23 Q And when I say "these people," I'm talking  
 24 about [REDACTED], Sultan, and [REDACTED] all are driven by  
 25 Janusz to the house?



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1 MR. CRITTON: Form.  
 2 THE WITNESS: I did not see Janusz drive, but  
 3 what's this.  
 4 BY MR. EDWARDS:  
 5 Q But that's what you understand?  
 6 A Yes.  
 7 MR. CRITTON: Form, speculation.  
 8 BY MR. EDWARDS:  
 9 Q Any other visitors?  
 10 A That's all I can remember.  
 11 Q Do you know how old [REDACTED] is?  
 12 A She, what's this.  
 13 Q Excuse me?  
 14 A I don't know her age, but she looks like,  
 15 what's this.  
 16 Q Did you say "what's this"?  
 17 A What?  
 18 Q I'm sorry. We're just I think  
 19 miscommunicating here.  
 20 A Okay.  
 21 Q I was asking the age of the person that you've  
 22 described as [REDACTED].  
 23 A I did not ask her age.  
 24 Q How do you know the names of [REDACTED], Sultan,  
 25 and [REDACTED]?

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1 A What's this? Janusz.  
 2 Q Okay. Any other visitors aside from those  
 3 three people that you have just listed, and the frequent  
 4 visitors: [REDACTED], [REDACTED], and [REDACTED].  
 5 A That's all I can remember.  
 6 Q Has Ghislaine Maxwell come to visit since  
 7 Mr. Epstein's been out of jail?  
 8 A No, sir.  
 9 Q Do you know if they frequently talk with one  
 10 another?  
 11 A I don't know, sir.  
 12 Q Do you know what the relationship is or has  
 13 been between Ghislaine Maxwell and Mr. Epstein?  
 14 A No.  
 15 MR. CRITTON: Form.  
 16 BY MR. EDWARDS:  
 17 Q In the five years or so that you've worked at  
 18 Mr. Epstein's house, what other persons besides  
 19 Mr. Epstein have received massages from these females,  
 20 from these female masseuses?  
 21 MR. CRITTON: Form.  
 22 THE WITNESS: I don't know.  
 23 BY MR. EDWARDS:  
 24 Q Do you know of any other visitors who have  
 25 frequented Mr. Epstein's house that have also received a

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1 massage from any of these females?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: I do not know.  
 4 BY MR. EDWARDS:  
 5 Q I'm just going to ask you if you can identify  
 6 any of these people in this book. If you can, okay, if  
 7 you cannot, it's fine.  
 8 MR. CRITTON: I want to mark those, please.  
 9 MR. EDWARDS: Well, if she can identify them  
 10 I'll mark them.  
 11 MR. CRITTON: No, no. I want them identified,  
 12 because if she can't identify them that's  
 13 significant to me as well. So can we mark those as  
 14 a composite?  
 15 MR. EDWARDS: I can mark them as a composite,  
 16 and we can either copy them here as black and white  
 17 or whatever.  
 18 MR. CRITTON: That's fine.  
 19 (Plaintiff's Exhibit No. 1 was marked for  
 20 identification.)  
 21 BY MR. EDWARDS:  
 22 Q Do you know who this is, have you ever seen  
 23 her before?  
 24 A No.  
 25 MR. CRITTON: And we'll call this Exhibit 1-A.

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1 MR. EDWARDS: And then the next page will be  
 2 "B," "C," "D"?  
 3 MR. CRITTON: Yeah.  
 4 BY MR. EDWARDS:  
 5 Q What was your response?  
 6 A No.  
 7 Q Never seen her before?  
 8 A No.  
 9 MR. CRITTON: Can you tell us who they are?  
 10 MR. EDWARDS: Can I tell you?  
 11 MR. CRITTON: Yes.  
 12 MR. EDWARDS: No.  
 13 MR. CRITTON: Okay.  
 14 MR. EDWARDS: She may be able to tell you.  
 15 BY MR. EDWARDS:  
 16 Q Have you ever seen her before?  
 17 MR. CRITTON: That's 1-B.  
 18 BY MR. EDWARDS:  
 19 Q This is 1-B.  
 20 A No.  
 21 Q That's not somebody that you recognize as  
 22 anybody working on Mr. Epstein's staff, pointing at  
 23 picture 1-B?  
 24 A No.  
 25 Q Okay. 1-C, is that somebody that you



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1 recognize --  
 2 A No.  
 3 Q -- as anybody who has ever been to  
 4 Mr. Epstein's house in the past five years?  
 5 A No.  
 6 Q 1-D, do you know who that is?  
 7 A No.  
 8 Q You don't remember seeing her come to  
 9 Mr. Epstein's house?  
 10 A No.  
 11 Q 1-E, do you know who that is?  
 12 A No.  
 13 Q In the five years that you worked there, you  
 14 never remember seeing her come to Mr. Epstein's house?  
 15 A No.  
 16 Q Do you know who this is?  
 17 A I remember this.  
 18 Q You remember her?  
 19 MR. CRITTON: Are you talking 1-F?  
 20 BY MR. EDWARDS:  
 21 Q Let's make sure we're right. 1-F.  
 22 A Yes.  
 23 Q All right. When do you remember seeing her?  
 24 A I cannot remember the dates, you know, but I  
 25 remember seeing her.

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1 Q Do you remember her name?  
 2 A No.  
 3 Q Does the name [REDACTED] refresh your recollection  
 4 as to who this person is?  
 5 A [REDACTED]?  
 6 Q You remember a [REDACTED]?  
 7 A I remember a name [REDACTED], but I don't know if  
 8 that's [REDACTED].  
 9 Q Okay. And where do you think that you saw  
 10 this person?  
 11 A In the house.  
 12 Q Do you know why she was there?  
 13 A No.  
 14 Q Is that one of the people that was giving a  
 15 massage, or is that somebody else?  
 16 A I do not know. I do not know.  
 17 MR. CRITTON: I'm sorry.  
 18 THE WITNESS: No, I do not see this.  
 19 BY MR. EDWARDS:  
 20 Q 1-G, that's not somebody you remember seeing?  
 21 A No.  
 22 Q 1-H, do you remember seeing that person?  
 23 A No.  
 24 Q This is a hard picture to decipher maybe, but  
 25 do you remember seeing that face? And that's 1-I.

107

1 A I cannot remember.  
 2 MR. CRITTON: This is 1-I now?  
 3 MR. EDWARDS: This is 1-I.  
 4 THE WITNESS: I cannot remember.  
 5 BY MR. EDWARDS:  
 6 Q By that I mean you've been able to tell me no,  
 7 no, no, no, no. When you say I don't remember, does  
 8 that mean maybe you have?  
 9 A Maybe, because the eyes.  
 10 Q Okay. So that's somebody who may look  
 11 familiar to you but you don't know why?  
 12 A Yes.  
 13 Q Okay. Is that somebody you remember seeing at  
 14 Mr. Epstein's house; I mean, is that where the  
 15 familiarity comes from?  
 16 A Maybe.  
 17 Q Okay. Do you recognize that person?  
 18 A That's [REDACTED].  
 19 Q And that's the person that you've been  
 20 describing as [REDACTED] throughout this deposition? When  
 21 you've talked about [REDACTED], that's the person you're  
 22 talking about?  
 23 A Yes.  
 24 MR. [REDACTED]: What number are we on now?  
 25 MR. CRITTON: "J."

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1 MR. MERMELSTEIN: "J."  
 2 MR. EDWARDS: [REDACTED] is "J."  
 3 BY MR. EDWARDS:  
 4 Q Do you know who that is, have you ever seen  
 5 that person?  
 6 A Yes.  
 7 Q Where have you seen him?  
 8 A In the house.  
 9 MR. CRITTON: This is "K" now?  
 10 BY MR. EDWARDS:  
 11 Q This is 1-K.  
 12 What have you seen him doing in the house?  
 13 A He came with his family.  
 14 Q Every time that he's been in the house he's  
 15 come with his family?  
 16 A No, no, no. He came with his family to spend  
 17 a week.  
 18 Q Okay. And did his family come to the house as  
 19 well?  
 20 A Yes. They stay there.  
 21 Q They stayed at the house?  
 22 A This is Mr. Dershowitz?  
 23 Q Right. And how many times have you seen  
 24 Mr. Dershowitz at the house in the time period that you  
 25 were there?



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1 A Two times.  
 2 Q And one of the times he was with his family?  
 3 A Yes.  
 4 Q And the other time is it safe to presume then  
 5 that he was alone?  
 6 A Yes.  
 7 Q During the time that he was with his family,  
 8 do you remember if Mr. Epstein received any massages  
 9 from females?  
 10 A No.  
 11 Q You don't remember, or he did not?  
 12 A Oh, he was there when Mr. Epstein was not in  
 13 the house.  
 14 Q Mr. Dershowitz and his family were in the  
 15 house when Mr. Epstein was not in the house?  
 16 A Yes. They spend a week there.  
 17 Q And Mr. Epstein was not in South Florida, you  
 18 mean, not in Palm Beach?  
 19 A No.  
 20 MR. CRITTON: That's correct?  
 21 BY MR. EDWARDS:  
 22 Q That's correct, my statement is correct?  
 23 A Correct.  
 24 MR. [REDACTED]: So no, he was not in the house?  
 25 THE WITNESS: He was not in the house.

110

1 BY MR. EDWARDS:  
 2 Q So Mr. Dershowitz and his family were  
 3 occupying the house in Palm Beach, and during that  
 4 period of time Mr. Epstein was not staying at the  
 5 Palm Beach house?  
 6 A No.  
 7 Q That's correct?  
 8 A I think he was in jail.  
 9 Q Oh, okay. This is a time period when  
 10 Mr. Epstein was in jail?  
 11 A (Nodding head).  
 12 Q That Mr. Dershowitz was at the house?  
 13 A Yes.  
 14 Q Okay. Other than that time period -- there  
 15 was another time period when Mr. Dershowitz was at the  
 16 house and he was not with his family?  
 17 A Yes.  
 18 Q And how long ago was that?  
 19 A Oh. I cannot remember when.  
 20 Q All right. Was it before Mr. Epstein went to  
 21 jail?  
 22 A I think after.  
 23 Q So you think again Mr. Epstein was not in the  
 24 house. To the best of your memory, has Mr. Dershowitz  
 25 been in the house at the same time Mr. Epstein has been

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1 in the house?  
 2 A I cannot remember.  
 3 Q Do you know if Mr. Dershowitz has ever been in  
 4 the house when the females would come to the house to  
 5 give Mr. Epstein a massage?  
 6 A I told you, I do not know.  
 7 Q You don't remember that?  
 8 A I don't remember that.  
 9 Q Okay. Do you know if Mr. Dershowitz has  
 10 received a massage while staying at Mr. Epstein's house?  
 11 A No.  
 12 Q You don't know?  
 13 A I don't know.  
 14 Q Do you know who that is?  
 15 MR. CRITTON: Let's get a letter now, or this  
 16 is going to be a mess.  
 17 MR. EDWARDS: Not really, they're all in  
 18 order.  
 19 MR. CRITTON: For the record, you're going how  
 20 about this person, and nobody is going to know who  
 21 you're talking about. This is "L."  
 22 MR. EDWARDS: Yeah.  
 23 BY MR. EDWARDS:  
 24 Q Who is 1-L?  
 25 A 1-L?

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1 Q Who is this?  
 2 A Oh. That's Ms. Maxwell.  
 3 Q That's Ghislaine Maxwell?  
 4 A Yes, sir.  
 5 Q That's somebody who you know?  
 6 A Yes, sir.  
 7 Q And you've seen her at the house before?  
 8 A Yes.  
 9 Q All right. And that's the same Ms. Maxwell  
 10 that hired you into the position, correct?  
 11 A Yes.  
 12 Q Do you remember seeing this person?  
 13 A That's Igor.  
 14 MR. CRITTON: "M."  
 15 BY MR. EDWARDS:  
 16 Q This is 1-M.  
 17 And how do you know Igor?  
 18 A He's now in the house.  
 19 Q He's now in the house?  
 20 A Yes.  
 21 Q But when we listed the people, I wanted you to  
 22 list for me all of the people --  
 23 A I forgot. I'm sorry. I forgot Igor.  
 24 Q Is there anybody else that you think you  
 25 forgot?



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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: center;">113</p> <p>1 A I think this is the only one I forgot.</p> <p>2 Q And what is his role in Mr. Epstein's life, if</p> <p>3 you know?</p> <p>4 A He's a driver and he is trainer.</p> <p>5 Q Trainer?</p> <p>6 A (Nodding head).</p> <p>7 Q What do you mean by that?</p> <p>8 A Because I saw him telling Mr. Epstein, one</p> <p>9 more lap.</p> <p>10 Q One more lap where?</p> <p>11 A In the swimming pool. And he said he's a</p> <p>12 trainer.</p> <p>13 Q Who said he's a trainer?</p> <p>14 A Igor.</p> <p>15 Q Igor told you that he's a trainer?</p> <p>16 A Yes.</p> <p>17 Q Okay. Do you know who that is?</p> <p>18 A No.</p> <p>19 Q Never seen her before?</p> <p>20 A Never.</p> <p>21 Q All right.</p> <p>22 MR. CRITTON: That's "N."</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q That's "N."</p> <p>25 Do you ever remember a girl named [REDACTED] coming</p>                                                                                              | <p style="text-align: center;">115</p> <p>1 A Because he aged.</p> <p>2 MR. CRITTON: He aged?</p> <p>3 THE WITNESS: He aged.</p> <p>4 MR. CRITTON: Okay.</p> <p>5 And this is "P."</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q This is "P."</p> <p>8 And this is, just so that you know, a fairly</p> <p>9 recent photograph of him, and you haven't seen him in</p> <p>10 how long?</p> <p>11 A After he left Mr. Epstein's employ.</p> <p>12 Q So it's been numerous years since you've seen</p> <p>13 this person?</p> <p>14 A Yes.</p> <p>15 Q So in fairness to you, that may be the reason</p> <p>16 why you didn't recognize this particular person?</p> <p>17 A Yes.</p> <p>18 Q Okay. And if any of these previous</p> <p>19 photographs were taken recently and you hadn't seen the</p> <p>20 person for five years, then that would be a possibility</p> <p>21 as to why you don't recognize that person anymore?</p> <p>22 MR. CRITTON: Form.</p> <p>23 (Telephone ringing.)</p> <p>24 MR. EDWARDS: Jack?</p> <p>25 MR. CRITTON: Jack?</p> |
| <p style="text-align: center;">114</p> <p>1 to the house?</p> <p>2 A [REDACTED]? I heard [REDACTED].</p> <p>3 Q But you never remember seeing somebody in the</p> <p>4 house that somebody referred to as [REDACTED]?</p> <p>5 A No. I don't know their names if they come, I</p> <p>6 don't know their names.</p> <p>7 Q But the name in this photograph, which is "N,"</p> <p>8 you don't remember seeing her?</p> <p>9 A No, sir.</p> <p>10 Q Do you know who that is?</p> <p>11 A Yes, sir.</p> <p>12 Q Who is that?</p> <p>13 A My employer.</p> <p>14 Q And that is Mr. Epstein?</p> <p>15 A Mr. Epstein.</p> <p>16 Q All right. So Mr. Epstein is "O"?</p> <p>17 A Correct.</p> <p>18 MR. CRITTON: Right.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q Do you know who that is?</p> <p>21 A I don't know.</p> <p>22 Q Do you remember Alfredo Rodriguez?</p> <p>23 A Oh. That's Alfredo? Oh, yes.</p> <p>24 Q Now that you look at the photograph, does it</p> <p>25 look like Alfredo Rodriguez?</p> | <p style="text-align: center;">116</p> <p>1 MR. HILL: Hey, guys. I got cut off. Sorry.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q This is "P." That was Alfredo Rodriguez,</p> <p>4 you've seen him in the house?</p> <p>5 A Yes.</p> <p>6 Q How many months was Alfredo Rodriguez working</p> <p>7 there overlapping your employment?</p> <p>8 A I started November, December, and then --</p> <p>9 about three months.</p> <p>10 Q Okay. Do you know who that is?</p> <p>11 A Oh. You got that from my Facebook?</p> <p>12 Q Do you know who that is?</p> <p>13 A That's me.</p> <p>14 Q Okay. You recognize that.</p> <p>15 MR. CRITTON: That was "Q."</p> <p>16 THE WITNESS: Thank you.</p> <p>17 MR. [REDACTED]: You made the book.</p> <p>18 THE WITNESS: My niece made it for me.</p> <p>19 MR. CRITTON: Next is "R."</p> <p>20 BY MR. EDWARDS:</p> <p>21 Q Do you know who this person is who is labeled</p> <p>22 1-R?</p> <p>23 A No.</p> <p>24 Q Never seen that person before?</p> <p>25 A No.</p>                                        |



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1 Q Has Mr. Epstein had anyone in the house that  
 2 you remember by the name of Martin?  
 3 A No.  
 4 Q Have you ever been on Mr. Epstein's planes?  
 5 A No.  
 6 Q Do you know this person who we are labeling  
 7 1-S?  
 8 A No.  
 9 Q You've never seen that person before?  
 10 A Never.  
 11 Q Do you know the name Leslie Wexner?  
 12 A I heard that one.  
 13 Q When did you hear about Leslie Wexner?  
 14 A In the news, it was in the news.  
 15 Q Other than in the news, you have no idea who  
 16 Leslie Wexner is?  
 17 A No.  
 18 Q Have you seen that person before?  
 19 MR. CRITTON: This is 1-T.  
 20 BY MR. EDWARDS:  
 21 Q 1-T.  
 22 A This is the Duke of, what's this?  
 23 Q Prince Andrew. Have you ever seen  
 24 Prince Andrew in Mr. Epstein's house?  
 25 A No.

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1 MR. CRITTON: Next one is "U."  
 2 BY MR. EDWARDS:  
 3 Q 1-U, have you ever seen this person?  
 4 A No. No, sir.  
 5 Q That's not somebody you recognize as ever  
 6 being at Mr. Epstein's house?  
 7 A No.  
 8 Q Do you know who this is?  
 9 A President Clinton.  
 10 Q Have you ever seen President Clinton in the  
 11 house?  
 12 A No.  
 13 MR. CRITTON: That was "U"?  
 14 MR. EDWARDS: That's "U."  
 15 MR. CRITTON: 1- is Clinton.  
 16 MR. EDWARDS: "U" was Clinton.  
 17 BY MR. EDWARDS:  
 18 Q Have you ever seen him at the house?  
 19 A No.  
 20 Q Have you ever seen him at all in person,  
 21 Mr. Clinton?  
 22 A No.  
 23 Q Have you ever heard that Mr. Clinton was ever  
 24 at Mr. Epstein's house?  
 25 A On the news.

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1 Q Okay. Other than on the news, anybody around  
 2 the house ever say that?  
 3 A President Clinton? No. Lyn and Jojo.  
 4 Q Lyn and Jojo. What did they say?  
 5 A Oh, not him. It's Kerry, Senator Kerry, they  
 6 have a picture.  
 7 Q Senator Kerry?  
 8 A Yes. Clinton? Let me see. Oh, no.  
 9 Q So Lyn and Jojo, at some point in time, told  
 10 you that Senator Clinton (sic) was at the New York  
 11 house?  
 12 MR. CRITTON: No. Senator Kerry.  
 13 BY MR. EDWARDS:  
 14 Q Senator Kerry. Sorry.  
 15 A I remember when I was in New York she showed  
 16 me a picture of them with Senator Kerry or Clinton, I  
 17 don't know, you know.  
 18 Q So either Kerry or Clinton was in a picture  
 19 with who?  
 20 A With Lyn and Jojo.  
 21 Q And this picture was purportedly taken at the  
 22 New York house of Mr. Epstein?  
 23 MR. CRITTON: Form.  
 24 THE WITNESS: I don't know if it's in the  
 25 house, but they showed me a picture.

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1 BY MR. EDWARDS:  
 2 Q Okay.  
 3 MR. [REDACTED]: This is "W."  
 4 BY MR. EDWARDS:  
 5 Q 1-W, have you ever seen this person?  
 6 A No.  
 7 Q No?  
 8 A No.  
 9 Q Do you know anybody by the name of  
 10 Cecelia Stein?  
 11 A Cecelia Stein? I heard about it.  
 12 Q How have you heard about her?  
 13 A Cecelia Stein. I know Cecelia that works in  
 14 the office.  
 15 Q Works in what office?  
 16 A New York.  
 17 Q You think she still works in that office?  
 18 A I don't know.  
 19 Q When was the last time you remember her  
 20 working in that office?  
 21 A I don't know. I just heard her name.  
 22 Q Okay. Through whom?  
 23 A Sometimes I think when I was in New York I  
 24 answer a phone call, so that's...  
 25 Q You remember a time -- did you ever hear of



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1 her being relocated to some other location?  
 2 A No.  
 3 MR. CRITTON: We are at 1-X now.  
 4 BY MR. EDWARDS:  
 5 Q So 1-X is [REDACTED]?  
 6 A Yes, sir.  
 7 Q And you recognize [REDACTED]?  
 8 A Yes.  
 9 Q Okay. Do you know who that is?  
 10 A I saw him on magazines.  
 11 Q David Copperfield, do you know who that is?  
 12 A Oh, yes.  
 13 Q And have you seen him at Mr. Epstein's house  
 14 ever?  
 15 A No, sir.  
 16 Q Do you know Mr. Epstein to be friends with  
 17 David Copperfield?  
 18 A No.  
 19 Q If Alfredo Rodriguez remembers him performing  
 20 magic in Mr. Epstein's living room, you weren't at the  
 21 house at that time?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: No. Because I did not see him.  
 24 BY MR. EDWARDS:  
 25 Q Okay. Do you ever remember anyone performing

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1 a magic show in Mr. Epstein's living room?  
 2 A No.  
 3 MR. EDWARDS: What are we at?  
 4 MR. CRITTON: "Z."  
 5 BY MR. EDWARDS:  
 6 Q Do you know this?  
 7 A Yes. What's his name.  
 8 Q Jean Luc Brunel. Do you know who that is?  
 9 A Yes.  
 10 Q How do you know him?  
 11 A He comes to the house.  
 12 Q He comes to the house. When you say "he comes  
 13 to the house," you've worked since November of 2004,  
 14 five years; when has he come to the house?  
 15 A He came after Mr. Epstein got out of jail.  
 16 Q And what did he do there?  
 17 A He talked to Mr. Epstein, had breakfast.  
 18 Q How long did he stay?  
 19 A About a day.  
 20 Q Okay. So he stayed overnight at the house?  
 21 A Yes.  
 22 Q And was he accompanied by any females?  
 23 A No.  
 24 Q Do you know what he does for a living?  
 25 A No.

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1 Q Do you know if he's a business associate or  
 2 partner of Mr. Epstein?  
 3 A No.  
 4 Q Had you seen him prior to this time that you  
 5 recently saw him after Mr. Epstein was out of jail?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: I cannot remember.  
 8 BY MR. EDWARDS:  
 9 Q Okay. Do you think that the first time that  
 10 you ever saw this person was recently, when Mr. Epstein  
 11 got out of jail?  
 12 A Yes.  
 13 Q Okay.  
 14 MR. CRITTON: So this is AA.  
 15 BY MR. EDWARDS:  
 16 Q Do you know who this is?  
 17 A No.  
 18 Q Have you ever seen him before?  
 19 A No.  
 20 Q All right.  
 21 A He's an actor?  
 22 Q Have you ever heard of the name Todd Meister?  
 23 A No.  
 24 Q That's not somebody you've ever taken a  
 25 message for that's called?

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1 A No.  
 2 Q Okay. The next one is BB. Do you know who  
 3 that is?  
 4 A That's Story.  
 5 Q Story Cowles?  
 6 A Yes. I don't know his family name, but Story.  
 7 Q When is the first time that you remember  
 8 seeing Story?  
 9 A First time? Mr. Epstein was in jail.  
 10 Q Okay. And was that as a result of him being  
 11 at the house with [REDACTED], Story and Ms. Kellen?  
 12 A No. I don't think so. He came without [REDACTED],  
 13 he came first without [REDACTED].  
 14 Q And did he knock on the door?  
 15 A Yes.  
 16 Q Or does he have a key?  
 17 A I think he knows the combination.  
 18 Q There is a combination to one of the doors to  
 19 get access to the house?  
 20 A Yes.  
 21 Q And Story Cowles is one of the people who has  
 22 the combination?  
 23 A Yes.  
 24 Q Who are the other people that have the  
 25 combination to get in Mr. Epstein's house?



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1 A Me.  
 2 Q Excuse me?  
 3 A Me.  
 4 Q Okay.  
 5 A Janusz.  
 6 Q Okay.  
 7 A Igor.  
 8 Q Okay.  
 9 ■■■■■■■■■■  
 10 Q Who is that?  
 11 A ■■■■■■■■■■  
 12 Q And when Story came to Mr. Epstein's house  
 13 without ■■■■■■■■■■, how long ago was that, do you remember?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: How long ago?  
 16 BY MR. EDWARDS:  
 17 Q Yes. Was Mr. Epstein in jail, was it before  
 18 he went to jail?  
 19 A Oh. The other day he came without ■■■■■■■■■■.  
 20 Q But the other day is not the first time you've  
 21 seen Story, right?  
 22 A Yes.  
 23 Q The other day was the first time you've seen  
 24 Story?  
 25 A No, no, no, no. I said he came without ■■■■■■■■■■.

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1 Q Right. This whole back and forth started with  
 2 me asking you when is the first time that you ever saw  
 3 Story. And I thought you responded by telling me that  
 4 he came to the house for the first time without ■■■■■■■■■■.  
 5 I don't want to put words in your mouth, we'll start  
 6 over.  
 7 A Okay.  
 8 Q When is the first time you saw Story?  
 9 A When Mr. Epstein was in jail.  
 10 Q Do you know why he came to the house?  
 11 A No.  
 12 Q Do you know who he talked to when he was  
 13 there?  
 14 ■■■■■■■■■■  
 15 Q And what did he talk to ■■■■■■■■■■ about?  
 16 A I do not know.  
 17 Q Did he talk to ■■■■■■■■■■ about Jeffrey being in  
 18 jail?  
 19 MR. CRITTON: Form. She said she didn't know.  
 20 THE WITNESS: I did not hear anything.  
 21 BY MR. EDWARDS:  
 22 Q Where did they talk?  
 23 A In the kitchen.  
 24 Q At the time were Story and ■■■■■■■■■■ boyfriend and  
 25 girlfriend, did you know?

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1 A No.  
 2 Q They weren't boyfriend and girlfriend yet?  
 3 A No.  
 4 Q Do you know when that evolved into a boyfriend  
 5 and girlfriend relationship?  
 6 A I don't know.  
 7 MR. EDWARDS: All right.  
 8 MR. CRITTON: Are you done?  
 9 MR. EDWARDS: Probably.  
 10 MR. ■■■■■■■■■■: Do you need a second? Do you  
 11 need a break?  
 12 MR. MERMELSTEIN: Can we take a break?  
 13 (Brief recess in proceedings.)  
 14 MR. EDWARDS: Jack, do you have questions,  
 15 too?  
 16 THE WITNESS: I'm trying to get a photograph  
 17 of somebody over there. I don't know if Esquire is  
 18 going to be able to print it, if they've got a  
 19 color copier, or if I've just got to run it over.  
 20 How much longer do you-all plan on going, do  
 21 you know?  
 22 MR. CRITTON: About another fifteen minutes.  
 23 I don't know. How long have you got, about  
 24 ten?  
 25 MR. MERMELSTEIN: About ten, fifteen.

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1 MR. CRITTON: I may have ten minutes worth of  
 2 questions.  
 3 MR. EDWARDS: We'll be another thirty minutes  
 4 at least.  
 5 MR. HILL: I might just get in the car and  
 6 shoot over there.  
 7 MR. EDWARDS: I think we're taking a break  
 8 right now anyway.  
 9 MR. CRITTON: Well, if we're going to take a  
 10 break, then I want to do a lunch break, I've got  
 11 some stuff I have to do. If we're only going to be  
 12 fifteen or twenty minutes, that's fine. But if  
 13 we're going to go another half hour, let's take a  
 14 lunch break.  
 15 MR. EDWARDS: It's going to take a while.  
 16 MR. CRITTON: So let's take a lunch break.  
 17 (Brief recess in proceedings.)  
 18 (Continued to Volume II.)



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1 STATE OF FLORIDA  
 2 COUNTY OF PALM BEACH  
 3  
 4  
 5 I, the undersigned authority, certify that  
 6 LOUELLA RABUYO personally appeared before me on the 20th  
 7 of October, 2009, and was duly sworn.  
 8  
 9 Dated this 30th day of October, 2009.  
 10  
 11  
 12  
 13  
 14  
 15 \_\_\_\_\_  
 16 Teresa Whalen, RPR, FPR  
 17 Notary Public - State of Florida  
 18 My Commission Expires: 4/25/11  
 19 My Commission No.: DD 644533  
 20 Job # 118991  
 21  
 22  
 23  
 24  
 25

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1 CERTIFICATE  
 2 STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5 I, Teresa Whalen, Registered Professional  
 6 Reporter and Notary Public in and for the State of  
 7 Florida at Large, do hereby certify that the  
 8 aforementioned witness was by me first duly sworn to  
 9 testify the whole truth; that I was authorized to  
 10 and did report said deposition in stenotype; and  
 11 that the foregoing pages are a true and correct  
 12 transcription of my shorthand notes of said  
 13 deposition.  
 14 I further certify that said deposition was  
 15 taken at the time and place hereinabove set forth  
 16 and that the taking of said deposition was commenced  
 17 and completed as hereinabove set out.  
 18  
 19 I further certify that I am not attorney or  
 20 counsel of any of the parties, nor am I a relative or  
 21 employee of any attorney or counsel of party connected  
 22 with the action, nor am I financially interested in the  
 23 action.  
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 25 The foregoing certification of this transcript  
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 Dated this 30th day of October, 2009.  
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