

1 APPEARANCES:

2 On behalf of Jane Does 1 through 8:

3 JESSICA ARBOUR, ESQUIRE
4 MERMELSTEIN & HOROWITZ, [REDACTED]
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6 Suite 2218
7 Miami, Florida 33160
8 Phone: [REDACTED]
9 E-mail: [REDACTED]

10 On behalf of the Defendant, Jeffrey Epstein:

11 MICHAEL J. PIKE, ESQUIRE
12 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
13 303 Banyan Boulevard
14 Suite 400
15 West Palm Beach, Florida 33401
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17 INDEX VOLUME 1

18 WITNESS: DIRECT CROSS REDIRECT RECROSS

19 ROCKY OREZZOLI

20 BY MR. PIKE 3

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1 PROCEEDINGS

2 ---
3 Deposition taken before Cynthia Hopkins,
4 Registered Professional Reporter and 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 (ROCKY OREZZOLI)

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

12 DIRECT EXAMINATION

13 BY MR. PIKE:

14 Q. Sir, my name is Michael Pike. I represent
15 a gentleman by the name of Jeffrey Epstein in this
16 matter. Have you ever had your deposition taken
17 before?

18 A. No.

19 Q. Okay. The way that it works is the person
20 sitting to your right and to my left is a court
21 reporter. The machine she's typing on doesn't
22 understand nods of the head or uh-huh and unh-unh.
23 So, what I would ask you to do is give a verbal
24 response so that she could take it down on the
25 machine there.

1 The other thing is that I am going to be
2 asking some questions. In everyday language it's
3 very common for the other person to start talking,
4 giving an answer, before the question is even done.
5 So, what I would ask is please allow me to finish my
6 question. And then I will allow you, in turn, to
7 finish your answer before I start the next question.
8 And this is just to make the court reporter here
9 happy. Okay?

10 A. Okay.

11 Q. All right. Please state your name for the
12 record.

13 A. Rocky Orezzaoli.

14 Q. Can you spell that, please.

15 A. R-o-c-k-y, last name is, O-r-e-z-z-o-l-i.

16 Q. Where is your current residence address?

17 A. Delray Beach, Florida.

18 Q. What the address?

19 A. [REDACTED]

20 Q. How long have you lived there?

21 A. Six years.

22 Q. Okay. And where are you currently
23 employed?

24 A. Technically I am self-employed.

25 Q. What do you do?

1 A. I am a soccer coach.
2 Q. Okay. Where do you work?
3 A. I work for Team Boca which is a soccer
4 association of Boca Raton. I am contracted to work for
5 them I should say.

6 Q. Is that a full-time position?

7 A. Yes.

8 Q. Okay. What schools do you work at?

9 A. I don't work at schools.

10 Q. Was there ever a time that you were a
11 soccer coach for any particular schools, high
12 schools and/or college?

13 A. Yes.

14 Q. What schooling?

15 A. I was at [REDACTED].

16 Q. Okay. How long were you at [REDACTED]
17 [REDACTED]?

18 A. I was an assistant there for five seasons and
19 also was head coach for 11 seasons. I taught some
20 classes there as well.

21 Q. Five seasons and 11 seasons, does that
22 work out in years?

23 A. More or less, yes.

24 Q. So, were you at [REDACTED] for more
25 than ten years?

1 A. Yes.
 2 Q. And did you teach -- did you coach both
 3 boys and girls soccer?
 4 A. No, just girls.
 5 Q. Was there ever a time you worked at any
 6 high schools teaching soccer?
 7 A. Yes.
 8 Q. Okay. What high schools?
 9 A. Spanish River High School.
 10 Q. And what else?
 11 A. St. Andrews High School. Actually that's a
 12 middle school and high school.
 13 Q. Any others?
 14 A. High schools?
 15 Q. Yeah.
 16 A. Actually it wasn't high school when I worked
 17 there. It was called Boca Academy which was way back.
 18 Q. Right.
 19 A. But I taught middle school boys there. Now
 20 it's the Pinecrest School in Boca.
 21 Q. Was there ever a time at [REDACTED]
 22 that you came to know a lady by the name of Jane Doe
 23 No. 4?
 24 A. Yes.
 25 Q. Okay. How did you come to know her?

1 A. She played for one of the local club teams.
 2 When I say local it means within the county. And I had
 3 seen her play a few times and she had been interested in
 4 [REDACTED], so we recruited her to attend and play
 5 soccer at [REDACTED].
 6 Q. Okay. What local club did she play for at
 7 the time if you recall?
 8 A. Palm Beach United.
 9 Q. And what year did Jane Doe No. 4 come to
 10 play soccer for [REDACTED]?
 11 A. She entered in the fall of [REDACTED] And she
 12 played [REDACTED].
 13 Q. What type of player was she during those
 14 years?
 15 MS. ARBOUR: Form.
 16 BY MR. PIKE:
 17 Q. As a coach what type of player was she?
 18 How would you describe her abilities?
 19 A. She was a good player.
 20 Q. Did she excel as a player from 2005 to
 21 [REDACTED]?
 22 MS. ARBOUR: Form.
 23 MR. PIKE: It's a legal objection. When
 24 another lawyer says form, they don't like the
 25 way that I am asking the question. So, they

1 are preserving it for the record if there is
 2 any future issue with the court. It doesn't
 3 mean that you don't have to answer the
 4 question.
 5 THE WITNESS: I was just -- I didn't know
 6 if there was an exchange that I had to wait.
 7 MR. PIKE: So, if you understand my
 8 question, then go ahead and answer it.
 9 THE WITNESS: I'm sorry. Could you repeat
 10 that?
 11 BY MR. PIKE:
 12 Q. Sure. Did she excel as a player between
 13 [REDACTED] and [REDACTED]?
 14 MS. ARBOUR: Same objection.
 15 MR. PIKE: Go ahead.
 16 THE WITNESS: She did well. She had a,
 17 she was technically a good player and I think
 18 she had probably normal ups and downs as a
 19 player but she did well.
 20 BY MR. PIKE:
 21 Q. How would you describe her as a player?
 22 A. Technically sound. She always had a very good
 23 fitness level. We gave fitness tests to the players
 24 when they came in, and she always performed very highly
 25 on those. She was a good -- I mean, she was a good

1 player. I don't know that -- it's a very open-ended
 2 question so I don't know specifically what you are
 3 asking.
 4 Q. You had an opportunity to coach her for
 5 approximately four years, correct?
 6 A. Yes.
 7 Q. And as a coach what I am asking you is how
 8 would you describe this specific player? I think
 9 you are going a good job: Technically sound, she
 10 had a high fitness level. Did you ever see her
 11 ability decrease between [REDACTED] and [REDACTED]?
 12 MS. ARBOUR: Form.
 13 THE WITNESS: In terms of technical
 14 ability?
 15 MR. PIKE: Yeah.
 16 THE WITNESS: No. I mean, like I said, I
 17 think she had normal, what I would view as
 18 normal ups and downs. She had times where she
 19 played well and she had times where she
 20 struggled. There were different games or so
 21 forth. But overall I think she was a good
 22 player. I think she was coachable. I believe
 23 she was a good teammate that took instruction
 24 well. So, those are things that you would say
 25 you have a good player.

1 BY MR. PIKE:
 2 Q. Was she on scholarship?
 3 A. Yes.
 4 Q. Okay. What type of scholarship if you
 5 recall?
 6 A. She was on an athletic scholarship.
 7 Q. Was it a full scholarship or partial
 8 scholarship?
 9 A. Partial scholarship.
 10 Q. Was it 50 percent or 75 percent ride or
 11 some other sort of break-out?
 12 MS. ARBOUR: Form.
 13 THE WITNESS: It was a -- I didn't do it
 14 by percentage, and I can't remember the exact
 15 percentage because I can't remember the exact
 16 cost of the school and obviously the cost of
 17 school increased each year. But her
 18 scholarship was probably -- it was in the 20's
 19 in terms of thousands of dollars and [REDACTED] costs
 20 upwards of about 40, probably a little more
 21 now. So, it was more than half.
 22 BY MR. PIKE:
 23 Q. And did that scholarship remain the same
 24 throughout [REDACTED]?
 25 A. Yes. And it increased which was a normal

1 case for [REDACTED] those years it didn't. It was generally
 2 the first week of November.
 3 Q. Between the years ~~2005 and 2009~~ was Jane Doe
 4 No. 4 in attendance regularly for practice between
 5 August and let's say November?
 6 MS. ARBOUR: Form.
 7 THE WITNESS: For the most part I think
 8 so. I believe so.
 9 BY MR. PIKE:
 10 Q. That's your best recollection?
 11 MS. ARBOUR: Form.
 12 THE WITNESS: Yeah. I mean, if she might
 13 have missed a training or two, I would have to
 14 think about it. But, I mean, generally she was
 15 there. I mean there was, there was a time or
 16 two, I think, during the freshman year. She
 17 might have missed practice.
 18 BY MR. PIKE:
 19 Q. Was she one to repetitively miss practice?
 20 A. No, not unless there was some reason, I would
 21 assume.
 22 Q. I see you brought some documents with you
 23 today. Is that your stuff there?
 24 A. No.
 25 Q. Did you bring any documents with you

1 thing that I did with the players if it was possible and
 2 there was no other issues. Issues would be if the
 3 player was not going to school or they were doing
 4 something they were not supposed to be, but they would
 5 normally get small increases as the school increased as
 6 well.
 7 Q. Did Jane Doe No. 4 always get an increase
 8 from 2005 to 2009?
 9 A. I believe so.
 10 Q. Tell me when the season starts for the
 11 female soccer team at [REDACTED] from [REDACTED] to
 12 [REDACTED].
 13 A. The players report for pre-season generally in
 14 the middle of August. It changes from year to year
 15 depending on the NCA mandate for each year but it's
 16 generally about the middle of August. Could be a
 17 little -- first, first two weeks of August.
 18 Q. Okay. And from August until when?
 19 A. The season would conclude, usually the regular
 20 season concluded the end of October or the first week of
 21 November. And then if the team qualified for the
 22 conference tournament, there would be additional games.
 23 And if they qualified for the NCA tournament, which in
 24 this case we did not, there would be, it could
 25 potentially go all the way to December. But in this

1 today?
 2 A. No, I did not.
 3 Q. Did you review anything before your
 4 deposition?
 5 A. I did not.
 6 Q. Did you speak with anybody before your
 7 deposition about your deposition?
 8 A. I did not. My wife. Sorry, my wife I spoke
 9 with.
 10 Q. And did anybody from Ms. Arbour's office
 11 call you to discuss your deposition?
 12 A. No.
 13 Q. Okay. When was the last time you have
 14 been in contact with Jane Doe No. 4?
 15 A. Probably about a year ago.
 16 Q. Okay. And how did you come in contact
 17 with her at that time?
 18 A. She called me. It was actually right about
 19 this time. I had already left [REDACTED] as of
 20 last [REDACTED]. So, I
 21 finished what would have been Jane Doe No. 4's senior
 22 year, and they had their athletic banquet around this
 23 time for all the sports. She had called me with just
 24 kind of a question. She had a conflict with her studies
 25 and the banquet and she just wanted some advice.

1 Q. What advice?
 2 MS. ARBOUR: Form.
 3 THE WITNESS: She had some final or some
 4 work due for finals or research papers that she
 5 was under pressure to finish. And she didn't
 6 know if she could attend the banquet. She just
 7 didn't know what she should do. I was not
 8 involved in the banquet at the time, but I
 9 guess she just called just to ask my thoughts
 10 on it.
 11 BY MR. PIKE:
 12 Q. Okay. Between [redacted] actually let's take
 13 them year-by-year. In [redacted] how many times would you
 14 see Jane Doe No. 4 during, for practice during the
 15 August and November practice season?
 16 A. When the players first report, when the
 17 team -- well, when the team first reports for practice
 18 generally we would go twice a day because it's before
 19 school, before the season starts. So, for August it's
 20 usually about two teams a day.
 21 Q. For how many days?
 22 A. At least for the first seven to ten days.
 23 Q. Okay.
 24 A. Now, there might be and there certainly would
 25 be times where we went once a day. There are some times

1 MS. ARBOUR: You're talking just [redacted]?
 2 MR. PIKE: Yes.
 3 THE WITNESS: September it would be
 4 either -- because our games start usually by
 5 the end of August would be the games
 6 competition dates. So if we had a competition,
 7 we wouldn't have practice. So just to clarify,
 8 we might have three days of practice, two
 9 games, and then two days off.
 10 MR. PIKE: Okay.
 11 THE WITNESS: That was like -- it wouldn't
 12 be abnormal.
 13 BY MR. PIKE:
 14 Q. Would that be the same for October and
 15 November?
 16 A. Correct. November until the first or second
 17 week until the season concluded.
 18 Q. And those same questions that I just asked
 19 you and that you answered, would that also be the
 20 same for the years [redacted]?
 21 A. More or less, yes.
 22 Q. Based upon your experience in coaching
 23 Jane Doe No. 4 in [redacted] how would you describe her
 24 personality?
 25 A. I mean, she's, she's a good kid. She was

1 that we would have a day off. But without consulting
 2 the training calendar, I wouldn't know for sure which
 3 days those were.
 4 And then once school starts generally,
 5 which at [redacted] was usually about the first week of
 6 September, give or take, although they did change
 7 from that time, then generally we would train once a
 8 day. The NCA mandates that once you're in season in
 9 school, you have to have a day off. So, typically
 10 there is always one day off. The other days would
 11 be training days or game days.
 12 Q. And when you say training days, I guess
 13 what I am trying to kind of narrow down is how many
 14 days would you, you know, give or take the days that
 15 you have off, see Jane Doe No. 4 for practice
 16 between August and November?
 17 MS. ARBOUR: Form.
 18 THE WITNESS: You're going to count half
 19 of August, September, October. I mean,
 20 possibly 60, 70 days probably.
 21 BY MR. PIKE:
 22 Q. How many days a week is practice in
 23 August?
 24 A. Probably six.
 25 Q. Okay. Same question for September.

1 friendly and she took the coaching well. And she was
 2 friends with her teammates and she worked hard.
 3 Q. Do you recall how she did in school [redacted]
 4 wise?
 5 MS. ARBOUR: Form.
 6 THE WITNESS: She did well. I think she
 7 had some terms where she did okay and some
 8 terms where she did very well.
 9 BY MR. PIKE:
 10 Q. What do you mean by okay?
 11 A. I only, I only -- I don't remember her
 12 specific G.P.A.'s but normally at the end of each term.
 13 We always got a list of the players that got a 4.0 or
 14 3.5 or 3.0 or better and a lot of players were always at
 15 least a 3.5 or 3.0 or better. She sometimes was in that
 16 list and sometimes she was below a 3.0. I don't
 17 remember which terms those were. I think she did better
 18 in her later seasons than her earlier seasons.
 19 Q. Was she always a varsity player?
 20 A. Yeah. There is no, there is no -- there is
 21 only one team at [redacted] one intercollegiate team. There
 22 was no junior varsity team.
 23 Q. Was she a starting player?
 24 A. She started most of, I would say the majority
 25 of the time.

1 Q. And when you say that, do you mean from
 2 [REDACTED]
 3 A. [REDACTED] yeah [REDACTED] was, the seasons were [REDACTED],
 4 the fall of [REDACTED].
 5 Q. Understood.
 6 A. There is a spring season but it's a different,
 7 kind of a different, a little bit of a different animal.
 8 It's a non-competitive season.
 9 Q. Between [REDACTED] and [REDACTED] was there ever a time
 10 that you coached Jane Doe No. 4 on the off-season?
 11 A. Well, like I said, we always had a spring
 12 season so typically in the in-state schools you have a
 13 competitive, which a competitive part of the season
 14 which soccer is the fall part. And then you have your
 15 non-competitive part where there is some different rules
 16 and regulations as to how often you can train, how much
 17 you can train, how many games you're allowed to play.
 18 So, the way we did it in the spring is
 19 typically the first month when the girls come back,
 20 we would do conditioning and weight training and you
 21 could do small group technical sessions.
 22 And then we would have a spring season.
 23 We would start around February 15th and go about the
 24 first week of April where we usually train three
 25 days a week. And we would have maybe a game on

1 when she was, if -- like most of the kids on
 2 the team, I say most of the girls on the team,
 3 I think she worked hard because it was
 4 important to her, the soccer aspect was
 5 important to her. So, I always saw her as
 6 working hard.
 7 The school work was a little up and down
 8 for her but I think she improved that as it
 9 went along. As far as ambitious I think
 10 ambitious to be a good teammate and be a good
 11 person and be a good soccer player and being a
 12 good student; most of the time I would
 13 characterize that for her.
 14 BY MR. PIKE:
 15 Q. Was there ever a time that you saw Jane
 16 Doe No. 4 unhappy in [REDACTED]
 17 MS. ARBOUR: Form.
 18 THE WITNESS: Yeah. I can, I can, I
 19 can't -- I am trying to remember a specific
 20 instance. I can remember a couple of instances
 21 where she seemed to be under pressure. I am
 22 just trying to think of the exact, the exact --
 23 MR. PIKE: Take your time.
 24 THE WITNESS: -- dates. There was one
 25 incident I can actually remember it was

1 weekends. And then once they were done in April,
 2 usually we let them just prepare for finals and that
 3 kind of thing.
 4 Q. You said Jane Doe No. 4 was friendly, she
 5 had, she was friendly with her teammates and that
 6 she was coachable. Did you notice whether or not
 7 Jane Doe No. 4 was a happy person?
 8 MS. ARBOUR: Form.
 9 THE WITNESS: Most of the time I thought
 10 she was a happy person.
 11 BY MR. PIKE:
 12 Q. Did she ever confide in you about any
 13 personal matters?
 14 A. No.
 15 Q. Never?
 16 MS. ARBOUR: Form.
 17 THE WITNESS: Not to my recollection.
 18 BY MR. PIKE:
 19 Q. Okay. Would you describe Jane Doe No. 4
 20 as a strong-willed person?
 21 MS. ARBOUR: Form.
 22 MR. PIKE: Ambitious?
 23 MS. ARBOUR: Form.
 24 THE WITNESS: I just -- they are very
 25 wide-open questions. I think she worked hard

1 probably during 2008 or 2009. It was kind of a
 2 freak thing. We were on a road trip and it was
 3 in the morning. We were staying in the Tampa
 4 area because we were playing one of the schools
 5 Tampa or St. Leo, or probably one of those two
 6 schools because that would have been close by.
 7 We were staying at a Hampton Inn that we
 8 had stayed at before. And our routine was we
 9 would have breakfast. We had a game probably
 10 at 4:00 or 5:00 that day. So we had breakfast.
 11 We had to check out of the hotel by 11:00. Our
 12 game wasn't until 5. One of the teammates
 13 parents lived close by in Tampa, so we would
 14 basically go there and have lunch.
 15 So, we had kind of the house to hang out
 16 at before we went to the, go to the game. And
 17 there was -- she had actually -- something had
 18 happened with the lock in her bathroom and she
 19 got locked in the bathroom for about three
 20 hours. And the workers were there trying to
 21 figure out the lock.
 22 They had to, they couldn't drill the lock
 23 out. They had to actually remove the door to
 24 get her out. So, she was really upset by it.
 25 I mean, I think I understand. And they were

1 all apologetic. The hotel was apologetic.
 2 They comped the room. The lock mechanism had
 3 just jammed and no keys would -- they actually
 4 had to take the hinges off the door but she was
 5 upset about that. And that was I think
 6 probably. Yes [REDACTED]
 7 BY MR. PIKE:
 8 Q. And you said there was one other instance.
 9 A. There was probably one or two other instances
 10 in five and/or six.
 11 Q. [REDACTED]
 12 A. Yes. The fall of [REDACTED] where she
 13 had -- I think she had some personal matters going on
 14 and she seemed to be under pressure I think. And this
 15 is not unusual in terms of when people are having
 16 troubles with different parts of their life. The soccer
 17 for them becomes an outlet and that's just how things
 18 are for different people.
 19 So, I think that she -- and I am just
 20 probably guessing here, but I think the soccer
 21 helped her because it took her mind off whatever, at
 22 least temporarily, off whatever was going on. There
 23 was a time she had her family, she had to miss
 24 practice and it was for family matters. And then I
 25 know in [REDACTED] she actually had to miss a couple games

1 to you between [REDACTED]
 2 MS. ARBOUR: Form.
 3 THE WITNESS: No.
 4 BY MR. PIKE:
 5 Q. Was she upbeat between [REDACTED]
 6 MS. ARBOUR: Form.
 7 THE WITNESS: I mean, upbeat, I mean I
 8 think she had a -- she's a logical person in
 9 terms -- so that's, certainly, most of what I
 10 remember. But was she like that every day,
 11 every minute? I mean, no. No one is like that
 12 all the time.
 13 MR. PIKE: Understood. Understood. I am
 14 not asking for all the time. I am asking for,
 15 you being her coach, I was, I was a wrestler
 16 and I wrestled and I wrestled five days a week,
 17 three hours a day and I got to know my coach
 18 very well.
 19 So, these questions are, you know, related
 20 to your general understanding and your general
 21 perception as a coach for that time period
 22 relative to this. I am not asking for
 23 anything, someone who is always up-beat. I
 24 understand.
 25 But separate and apart from that, did you

1 because there was a family issue and I didn't delve
 2 into the issue. I mean, I trusted that it was a,
 3 that she was, it was a family matter that she was
 4 dealing with.
 5 Q. As a player would she be required to fill
 6 out a request for excuse, for excusal from any
 7 practice or game?
 8 A. No. I mean those would just be done on a, on
 9 an individual basis with any player.
 10 Q. Face-to-face with you being the catch?
 11 A. Correct.
 12 Q. Would you take down any records for the
 13 NCAA in that regard?
 14 A. NCA, no.
 15 Q. So, the procedure would be just a common
 16 procedure. If a player was having a personal issue
 17 they would come to you and say, coach, I am not
 18 going to be able to be here; I have a family issue.
 19 I don't want to delve into it, but that's what it
 20 is.
 21 MS. ARBOUR: Form.
 22 THE WITNESS: I don't know if I would put
 23 it exactly that way but that's the gist.
 24 BY MR. PIKE:
 25 Q. Has Jane Doe No. 4 ever seemed depressed

1 ever see any personality changes in Jane Doe
 2 No. 4 from [REDACTED]?
 3 MS. ARBOUR: Form.
 4 THE WITNESS: Nothing, nothing, nothing in
 5 terms of, nothing drastic. As there are times
 6 that you can recall players maybe having a bad
 7 day or just there are other things on their
 8 mind, sure. But as far as a drastic
 9 personality change, no.
 10 BY MR. PIKE:
 11 Q. Did Jane Doe No. 4 exhibit any behavioral
 12 or health issues to your knowledge between '05 and
 13 '08?
 14 MS. ARBOUR: Form.
 15 THE WITNESS: Nothing. I think that was
 16 outside the context of playing, like an injury.
 17 BY MR. PIKE:
 18 Q. Do you know anything about Jane Doe No. 4
 19 health? And when I say health I mean mental health?
 20 MS. ARBOUR: At any time?
 21 MR. PIKE: Between [REDACTED]?
 22 THE WITNESS: Do I know anything?
 23 MR. PIKE: Yeah.
 24 THE WITNESS: Yeah.
 25

1 BY MR. PIKE:
 2 Q. Do you know whether or not Jane Doe No. 4
 3 was seeing a psychologist, psychiatrist or social
 4 worker or any counselor between [REDACTED]
 5 MS. ARBOUR: Form.
 6 THE WITNESS: I do not recall that, no.
 7 BY MR. PIKE:
 8 Q. Okay. Do you know whether or not Jane Doe
 9 No. 4 had any problems with drugs or alcohol between
 10 '05 and '08?
 11 MS. ARBOUR: Form.
 12 THE WITNESS: No.
 13 BY MR. PIKE:
 14 Q. Do you know where Jane Doe No. 4 worked at
 15 anyplace of employment between [REDACTED]?
 16 MS. ARBOUR: Form.
 17 THE WITNESS: No.
 18 BY MR. PIKE:
 19 Q. You have no idea where she was employed
 20 during those years?
 21 MS. ARBOUR: Form. Asked and answered.
 22 MR. PIKE: You can answer.
 23 THE WITNESS: I don't think, I mean I
 24 didn't necessarily know where they worked. I
 25 am trying to think if I recall if she did work.

1 Epstein prior to today?
 2 A. Yes.
 3 Q. How have you heard that name?
 4 A. It's in the papers.
 5 Q. Okay. And what have you read?
 6 A. That he is a wealthy guy that's got in trouble
 7 for some stuff he should not be doing. Something about
 8 paying girls for massages.
 9 Q. Did you ever come to learn that Jane Doe
 10 No. 4 filed a lawsuit against Jeffrey Epstein?
 11 A. No.
 12 Q. So, when you were reading those articles
 13 you had no idea that Jane Doe No. 4 filed a lawsuit
 14 against Mr. Epstein?
 15 MS. ARBOUR: Form.
 16 THE WITNESS: No.
 17 BY MR. PIKE:
 18 Q. But for my having told you that today,
 19 have you ever heard of Jane Doe No. 4 being involved
 20 with a gentleman by the name of Jeffrey Epstein?
 21 A. No.
 22 Q. Based upon your interactions with Jane Doe
 23 No. 4 between '05 and '08, would you describe her as
 24 angry, bitter, disliking herself or depressed?
 25 MS. ARBOUR: Form.

1 I mean, it's not a question that I would
 2 normally know because if it didn't conflict
 3 with her studies or her school or her soccer,
 4 then it wouldn't be something that would
 5 normally come up. Wait. She did work at Pine
 6 Tree Camps one summer.
 7 BY MR. PIKE:
 8 Q. And is that a soccer camp?
 9 A. Well, [REDACTED] has a summer camp that
 10 they, that it's kind of auxiliary for the school for
 11 most of the younger kids. So, it's not a soccer camp
 12 it's just a camp. So, she worked as a counselor there.
 13 Certainly, I think between either before the season so
 14 it would have been the summer of 2008, 2007 and/or 2008.
 15 I can't recall for sure if it was both or just one.
 16 Q. Do you know whether or not Jane Doe No. 4
 17 had a boyfriend named [REDACTED]?
 18 A. No.
 19 Q. Had you ever met any of Jane Doe No. 4's
 20 boyfriends between 2 [REDACTED]?
 21 A. No.
 22 Q. Have you ever met any of Jane Doe No. 4's
 23 boyfriends at any time that you're aware of?
 24 A. No.
 25 Q. Have you ever heard the name Jeffrey

1 THE WITNESS: No.
 2 BY MR. PIKE:
 3 Q. Are you familiar with any medical history
 4 relative to Jane Doe No. 4?
 5 MS. ARBOUR: Form.
 6 MR. PIKE: Well, do you want me to go into
 7 it?
 8 MS. ARBOUR: Well, you already asked him.
 9 MR. PIKE: If you withdraw the form, I am
 10 going to let him ask. I am trying to be nice
 11 here.
 12 MS. ARBOUR: Okay. I appreciate that. I
 13 noticed.
 14 MR. PIKE: I am going to ask the question
 15 one more time.
 16 THE WITNESS: I have a comment. Go ahead.
 17 This is before that. Can I go back?
 18 MR. PIKE: Sure.
 19 THE WITNESS: Only because I am thinking
 20 about the relationship with Epstein.
 21 MR. PIKE: Understood.
 22 THE WITNESS: [REDACTED] had to miss a game
 23 because of a family matter in [REDACTED] and it was a
 24 legal issue that she said it was a family
 25 issue, a legal issue. So, I asked her for the

1 paper just so I had something and she handed me
 2 a sheet of paper that had like a case on it.
 3 BY MR. PIKE:
 4 Q. Do you remember what it said?
 5 A. It was a -- it was a, it wasn't like a -- it
 6 wasn't like a subpoena. Was it a subpoena? I just
 7 remember. I remember it was a legal issue. Her name
 8 was on it. There was a few other names as Defendants.
 9 So I took it as legitimate. It was Palm Beach,
 10 whatever. And I just, you know, so that was kind of I
 11 wanted to make sure that there was -- you asked about
 12 permission so we didn't do a permission slip.
 13 Q. Understood.
 14 A. If you were going to miss for a reason and
 15 this was something that I could file, I wasn't going to
 16 question it any further.
 17 Q. To your recollection was her name on that
 18 paper as a Defendant?
 19 A. No. It wasn't a Defendant. It wasn't as a
 20 Defendant, but I am trying to remember if it was, if the
 21 name Epstein was on the paper.
 22 Q. As you sit here today do you recall
 23 whether or not Epstein's name was on that paper?
 24 A. I don't know. It may have been.
 25 Q. Do you know for certain?

1 and [REDACTED]?
 2 A. No.
 3 Q. Okay. Did Jane Doe No. 4 ever quit the
 4 soccer team for any reason during [REDACTED]?
 5 A. No.
 6 Q. Okay. Was she a committed player to the
 7 soccer team and to her teammates between [REDACTED] and
 8 [REDACTED]?
 9 MS. ARBOUR: Form.
 10 THE WITNESS: I think so, yes.
 11 BY MR. PIKE:
 12 Q. Did it ever seem like school and sports
 13 were too much for Jane Doe No. 4 to handle in
 14 tandem?
 15 MS. ARBOUR: Form.
 16 THE WITNESS: I don't think so. I only
 17 would just refer --
 18 BY MR. PIKE:
 19 Q. Let me rephrase the question. Based upon
 20 your experience and involvement with Jane Doe No. 4
 21 as her coach between '05 and '08, did it ever seem
 22 to you that school and sports were too much for Jane
 23 Doe No. 4 to handle in tandem?
 24 A. No.
 25 MR. PIKE: I have no further questions.

1 A. I don't remember.
 2 Q. So, as you sit here today you don't
 3 recall?
 4 A. I guess that's the safest. That's the safest
 5 answer, yes.
 6 Q. Okay. Did Jane Doe No. 4 ever discuss her
 7 medical history with you in any context?
 8 A. Not that I recall.
 9 Q. Okay. Did Jane Doe No. 4 ever have to
 10 fill out any papers for [REDACTED] relative to
 11 her position as a soccer player delineating her
 12 medical history to your knowledge?
 13 A. When the players enter for the first time
 14 before their freshman year, they have to do a bunch of
 15 forms that go to our athletic trainer that include a
 16 physical and a participation medical history form. So,
 17 our athletic training staff at [REDACTED], athletic training
 18 staff gets those forms.
 19 Q. Did Jane Doe No. 4 ever have to be excused
 20 from practice for any sort of surgical procedure, if
 21 you recall? I don't want you to guess.
 22 A. I don't recall. If there is something
 23 specific, I can't, I mean, I can't recall.
 24 Q. Are you aware of any surgical procedures
 25 that Jane Doe No. 4 underwent between the years [REDACTED] and [REDACTED]?

1 MS. ARBOUR: Okay. I just have a couple
 2 quick ones.
 3 MR. PIKE: She's quick.
 4 MS. ARBOUR: And I talk fast.
 5 CROSS (ROCKY OREZZOLI)
 6 BY MS. ARBOUR:
 7 Q. Okay. Outside of soccer practice and
 8 soccer games, how often did you interact with Jane
 9 Doe No. 4 between [REDACTED] and [REDACTED]?
 10 A. Not that much. In the recruiting process
 11 which would be during, would be during the junior and
 12 senior year, you do have probably interaction where you
 13 call them once a week. It's kind of like a check-in,
 14 call kind of stuff. Once in school, after preseason you
 15 see them all the time, I feel like, because they are the
 16 only ones on campus. But aside from maybe individual
 17 meetings that might take place once in the fall and once
 18 in the spring and just occasionally seeing them on
 19 campus, you know, not, not that often at a practice.
 20 Sometimes but not, not that often.
 21 Q. Okay. So, outside of soccer would it be
 22 fair to say you didn't have a social relationship
 23 with Jane Doe No. 4?
 24 A. That's fair.
 25 Q. Okay. Between [REDACTED] and [REDACTED] seasons

1 what were the consequences, if any, for missing
2 practice repeatedly?

3 A. Well, I mean, if you missed an unexcused
4 practice, I mean I guess if you miss repeatedly, the end
5 result would be removal from the team and loss of
6 scholarship.

7 Q. Okay.

8 A. I guess if that's -- obviously, there would be
9 kind of steps to get to that point, but that would be
10 the end result.

11 Q. Okay. So, if there was a pattern of
12 missing practices, there would be consequences for
13 that?

14 A. Yeah, absolutely.

15 Q. Okay. Did someone tell you before today
16 that you were here to give a deposition of Jane Doe
17 No. 4?

18 A. Yes, the --

19 Q. Paralegal?

20 A. No. The thing that I had had her name on it,
21 so I could only assume that. And then when I spoke to
22 Jessica, she only explained that because it just said
23 Jane Doe No. 4 versus John Doe or something like that.
24 So, so, she just explained that they were representing
25 the Defendant and they wanted the deposition.

1 MR. PIKE: Form.

2 THE WITNESS: I guess, yes.

3 BY MS. ARBOUR:

4 Q. The family matters that Jane Doe No. 4
5 missed practice for in [REDACTED] -- you said she missed a
6 practice and a couple of games; is that right?

7 A. Yeah. [REDACTED] she missed her -- I only remember
8 that because it was actually a trip where we were away.
9 So, it was the opening games of our [REDACTED] season. We
10 were flying to Charlotte and she had this court date was
11 on the Friday, and I think we were leaving Wednesday or
12 Thursday.

13 So, she couldn't go on the trip which is a
14 pretty big deal that you can't go on the trip. So
15 that's why I asked for the, just the sheet of paper.
16 And you know, once I saw it, I just said okay. And
17 that was after the fact actually.

18 Q. Do you recall if that paper referred to a
19 federal grand jury?

20 A. I don't recall.

21 Q. Okay. The family matters that she missed
22 a practice for as well, did you ever inquire what
23 that was about?

24 A. Later in [REDACTED]

25 Q. Yes.

1 And there is a contact between to --
2 because there was a -- originally they thought I
3 lived in Broward County. So, it was originally
4 going to be down there, and it had to be changed.
5 So all I knew was basically that obviously I would
6 be talking about Jane Doe No. 4 because that was the
7 only person I knew on the list.

8 Q. Okay. And was that conversation you said
9 Jessica, was that Jessica Cadwell here at Mr. Pike's
10 office?

11 A. Yes, I'm sorry.

12 Q. You said Jane Doe No. 4's name was on the
13 subpoena that you received?

14 A. Yes.

15 Q. And did anyone from Mr. Pike's office tell
16 you who the Defendant was?

17 A. No.

18 Q. Okay. Is today the first day that there
19 is any suggestion that Jane Doe No. 4 is suing
20 Jeffrey Epstein?

21 A. Yes.

22 Q. Okay. Is today the first suggestion
23 that's been made to you that Jane Doe No. 4 was, I
24 think Mr. Pike's words were involved with Jeffrey
25 Epstein?

1 A. Later in [REDACTED] I did not inquire. Well, I mean
2 I inquired to the point where, you know, if she needed
3 to tell me something or if she needed help with anything
4 that she just said it was a personal family matter and I
5 didn't press it any further.

6 MS. ARBOUR: Okay. That's all I have.

7 MR. PIKE: I will order.

8 MS. ARBOUR: Do you want to explain read
9 or waive to him?

10 MR. PIKE: You have an opportunity to read
11 your deposition or waive your deposition. What
12 that means is you can read it. The court
13 reporter will send it to you and if you feel
14 like you have been, if you feel like you need
15 to make any corrections to the deposition.
16 There is an errata sheet provided on the back.

17 It's just a blank sheet with lines through
18 it, and you can correct your deposition or you
19 can waive that right today if everything you
20 feel was honest here today that you don't need
21 to make any corrections you can waive that
22 right and the deposition will be transcribed
23 and produced based on your spoken word here
24 today.

25 THE WITNESS: I think, I think we're good.

1 MS. ARBOUR: You will waive?
 2 THE WITNESS: I will waive.
 3 MS. ARBOUR: Okay. I will just a take a
 4 mini or an electronic.
 5 (Witness excused.)
 6 (Deposition was concluded.)
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1 CERTIFICATE
 2 STATE OF FLORIDA
 3 COUNTY OF PALM BEACH
 4
 5

6 I, Cynthia Hopkins, Register Professional
 7 Reporter, Florida Professional Reporter, and Notary
 8 Public in and for the State of Florida at Large, do
 9 hereby certify that the aforementioned witness was
 10 by me first duly sworn to testify the whole truth;
 11 that I was authorized to and did report said
 12 deposition in stenotype; and that the foregoing
 13 pages numbered 1 to 40, inclusive, are a true and
 14 correct transcription of my shorthand notes of said
 15 deposition.

16 I further certify that said deposition was
 17 taken at the time and place hereinabove set forth
 18 and that the taking of said deposition was commenced
 19 and completed as hereinabove set out.

20 I further certify that I am not attorney
 21 or counsel of any of the parties, nor am I a
 22 relative or employee of any attorney or counsel of
 23 party connected with the action, nor am I
 24 financially interested in the action.

25 The foregoing certification of this transcript
 does not apply to any reproduction of the same by
 any means unless under the direct control and/or
 direction of the certifying reporter.

Dated this 12th day of May, 2010.

Cynthia J. Hopkins

Cynthia Hopkins, RPR, FPR

Job #1939

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA
 3 COUNTY OF PALM BEACH
 4
 5

6 I, the undersigned authority, certify that
 7 ROCKY OREZZOLI personally appeared before me
 8 and was duly sworn.
 9

10 Dated this 12th day of May, 2010.
 11
 12
 13
 14

15 *Cynthia J. Hopkins* 

16 Cynthia Hopkins, RPR, FPR
 17 Notary Public - State of Florida
 18 My Commission Expires: February 25, 2011
 19 My Commission No.: DD 643788

20 Job #1939
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 25